

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

DISTRICT COURT, COUNTY OF DENVER,
STATE OF COLORADO

Court Address:

1437 Bannock Street

Denver, CO 80202

^ COURT USE ONLY ^

ERIC COOMER, Ph.D.,

Case No. 20CV34319

Plaintiff,

Courtroom 409

vs.

DONALD J. TRUMP FOR PRESIDENT, INC.,

SIDNEY POWELL, SIDNEY POWELL, P.C.

RUDOLPH GIULIANI, JOSEPH OLTMANN,

FEC UNITED, SHUFFLING MADNESS

MEDIA, INC., d/b/a CONSERVATIVE DAILY,

JAMES HOFT, TGP COMMUNICATIONS LLC

d/b/a THE GATEWAY PUNDIT, MICHELLE

MALKIN, ERIC METAXAS, CHANEL RION,

HERRING NETWORKS, INC.,

d/b/a ONE AMERICA NEWS NETWORK,

and NEWSMAX MEDIA, INC.,

Defendants.

VIDEO VIDEOCONFERENCED DEPOSITION OF JOSEPH OLTMANN

September 8, 2021

<p>1 VIDEOCONFERENCED APPEARANCES:</p> <p>2 ON BEHALF OF THE PLAINTIFF:</p> <p>3 CHARLES J. CAIN, ESQ.</p> <p>4 BRAD KLOEWER, ESQ.</p> <p>5 STEVE SKARNULIS, ESQ.</p> <p>6 ZACH BOWMAN, ESQ.</p> <p>7 Cain & Skarnulis PLLC</p> <p>8 P O. Box 1064</p> <p>9 Salida, California 81201</p> <p>10 Phone: 719-530-3011</p> <p>11 Email: ccain@cstrial.com</p> <p>12 Email: bkloewer@cstrial.com</p> <p>13 Email: skarnulis@cstrial.com</p> <p>14 Email: zbowman@cstrial.com</p> <p>15 ON BEHALF OF THE PLAINTIFF:</p> <p>16 THOMAS M. ROGERS III (TREY), ESQ.</p> <p>17 Recht Kornfeld PC</p> <p>18 1600 Stout Street, Suite 1400</p> <p>19 Denver, Colorado 80202</p> <p>20 Phone: 303-573-1900</p> <p>21 Email: trey@rklawpc.com</p> <p>22 ON BEHALF OF THE DEFENDANT DONALD J. TRUMP</p> <p>23 FOR PRESIDENT, INC.:</p> <p>24 ERIC R. HOLWAY, ESQ.</p> <p>25 BETH CHAMBERS, ESQ.</p> <p>Jackson Kelly PLLC</p> <p>1099 18th Street, Suite 2150</p> <p>Denver, Colorado 80202</p> <p>Phone: 303-390-0016</p> <p>Email: eric.holway@jacksonkelly.com</p> <p>Email: beth.chambers@jacksonkelly.com</p> <p>ON BEHALF OF THE DEFENDANT DEFENDING THE REPUBLIC:</p> <p>CHRISTOPHER SEERVELD, ESQ.</p> <p>Dymond • Reagor, PLLC</p> <p>8400 East Prentice Avenue, Suite 1040</p> <p>Greenwood Village, Colorado 80111</p> <p>Phone: 303-734-3400</p> <p>Email: cseerveld@drc-law.com</p>	<p>1 VIDEOCONFERENCED APPEARANCES (Cont'd):</p> <p>2 ON BEHALF OF THE DEFENDANT MICHELLE MALKIN:</p> <p>3 GORDON QUEENAN, ESQ.</p> <p>4 Patterson & Ripplinger, PC</p> <p>5 5613 DTC Parkway, Suite 400</p> <p>6 Greenwood Village, Colorado 80111</p> <p>7 Phone: 303-741-4539</p> <p>8 Email: gqueenan@prpcclegal.com</p> <p>9 ON BEHALF OF THE DEFENDANT ERIC METAXAS:</p> <p>10 MARGARET BOEHMER, ESQ.</p> <p>11 Gordon & Rees</p> <p>12 555 17th Street, Suite 3400</p> <p>13 Denver, Colorado 80202</p> <p>14 Phone: 303-534-5160</p> <p>15 Email: mboehmer@grsm.com</p> <p>16 ON BEHALF OF THE DEFENDANT CHANEL RION And ONE AMERICA</p> <p>17 NEWS NETWORK:</p> <p>18 BLAINE KIMREY, ESQ.</p> <p>19 BRYAN CLARK, ESQ.</p> <p>20 Vedder Price</p> <p>21 222 North LaSalle Street</p> <p>22 Chicago, Illinois 60601</p> <p>23 Phone: 312-609-7865</p> <p>24 Email: bkimrey@vedderprice.com</p> <p>25 Email: bclark@vedderprice.com</p> <p>ON BEHALF OF THE DEFENDANTS CHANEL RION and ONE AMERICA</p> <p>NEWS NETWORK:</p> <p>STEPHEN DEXTER, ESQ.</p> <p>Lathrop GPM LLP</p> <p>1515 Wynkoop Street, Suite 600</p> <p>Denver, Colorado 80202</p> <p>Phone: 720-931-3200</p> <p>Email: stephen.dexter@lathropgpm.com</p> <p>ON BEHALF OF THE DEFENDANTS CHANEL RION and HERRING</p> <p>NETWORKS, INC. d/b/a ONE AMERICA NEWS NETWORK:</p> <p>PETER SCOTT, ESQ.</p> <p>JEREMY GRAY, ESQ.</p> <p>Early Sullivan Wright Gizer & McRae LLP</p> <p>6420 Wilshire Boulevard, 17th Floor</p> <p>Los Angeles, California 90048</p> <p>Phone: 970-419-8234</p> <p>Email: pscott@earlysullivan.com</p> <p>Email: jgray@earlysullivan.com</p>																						
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<p>1 VIDEOCONFERENCED APPEARANCES (Cont'd):</p> <p>2 ON BEHALF OF THE DEFENDANT SIDNEY POWELL AND</p> <p>3 SIDNEY POWELL PC:</p> <p>4 BARRY ARRINGTON, ESQ.</p> <p>5 Arrington Law Firm</p> <p>6 3801 East Florida Avenue, Suite 830</p> <p>7 Denver, Colorado 80210</p> <p>8 Phone: 303-205-7870</p> <p>9 Email: barry@arringtonpc.com</p> <p>10 ON BEHALF OF THE DEFENDANTS JOSEPH OLTSMANN, FEC UNITED,</p> <p>11 and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:</p> <p>12 ANDREA M. HALL, ESQ.</p> <p>13 The Hall Law Office, LLC</p> <p>14 P O. Box 2251</p> <p>15 Loveland, Colorado 80539</p> <p>16 Phone: 970-419-8234</p> <p>17 Email: andrea@thehalllawoffice.com</p> <p>18 ON BEHALF OF THE DEFENDANTS JOSEPH OLTSMANN, FEC UNITED,</p> <p>19 and SHUFFLING MADNESS MEDIA, INC., d/b/a CONSERVATIVE DAILY:</p> <p>20 INGRID J. DEFRANCO, ESQ.</p> <p>21 The Law Office of Ingrid J. DeFranco</p> <p>22 P O. Box 128</p> <p>23 Brighton, Colorado 80601</p> <p>24 Phone: 303-443-1749</p> <p>25 Email: defrancoi@yahoo.com</p> <p>ON BEHALF OF THE DEFENDANTS JAMES HOFT AND</p> <p>TGP COMMUNICATIONS, LLC d/b/a THE GATEWAY PUNDIT:</p> <p>JONATHAN BURNS, ESQ.</p> <p>The Burns Law Firm</p> <p>P O. Box 191250</p> <p>St. Louis, Missouri 63119</p> <p>Phone: 314-329-5040</p> <p>Email: tbtf@pm me</p> <p>ON BEHALF OF THE DEFENDANTS JAMES HOFT AND</p> <p>TGP COMMUNICATIONS, LLC d/b/a THE GATEWAY PUNDIT:</p> <p>RANDY CORPORON, ESQ.</p> <p>Law Offices of Randy B. Corporon, PC</p> <p>2821 South Parker Road, Suite 555</p> <p>Aurora, Colorado 80014</p> <p>Phone: 303-749-0062</p> <p>Email: rbc@corporonlaw.com</p>	<p>1 PURSUANT TO WRITTEN NOTICE and the</p> <p>2 appropriate rules of civil procedure, the video</p> <p>3 videoconferenced deposition of JOSEPH OLTSMANN, called for</p> <p>4 examination by the Plaintiff, was taken remotely,</p> <p>5 commencing at 10:04 a.m. on September 8, 2021, before</p> <p>6 Laurel S. Tubbs, a Registered Professional Reporter,</p> <p>7 Certified Realtime Reporter and Notary Public in and for</p> <p>8 the State of Colorado.</p> <p>9 INDEX</p> <table> <tr> <td>10 EXAMINATION:</td> <td>PAGE</td> </tr> <tr> <td>11 By Mr. Cain</td> <td>7</td> </tr> <tr> <td>12 By Ms. Hall</td> <td>146</td> </tr> <tr> <td>13 By Mr. Arrington</td> <td>148</td> </tr> <tr> <td>14 EXHIBITS:</td> <td>PAGE</td> </tr> <tr> <td>15 Exhibit 2 Affidavit of Mr. Oltmann</td> <td>117</td> </tr> <tr> <td>16 Exhibit 29 Notes of Mr. Oltmann</td> <td>12</td> </tr> <tr> <td>17 Exhibit 46 Document Entitled "Parley"</td> <td>96</td> </tr> <tr> <td>18 Exhibit 103 Email Stream</td> <td>137</td> </tr> <tr> <td>19 Exhibit 104 IOS IMESSAGE/SMS/MMS</td> <td>93</td> </tr> <tr> <td>20 Exhibit 131 Post by Mr.</td> <td>80</td> </tr> </table>	10 EXAMINATION:	PAGE	11 By Mr. Cain	7	12 By Ms. Hall	146	13 By Mr. Arrington	148	14 EXHIBITS:	PAGE	15 Exhibit 2 Affidavit of Mr. Oltmann	117	16 Exhibit 29 Notes of Mr. Oltmann	12	17 Exhibit 46 Document Entitled "Parley"	96	18 Exhibit 103 Email Stream	137	19 Exhibit 104 IOS IMESSAGE/SMS/MMS	93	20 Exhibit 131 Post by Mr.	80
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<p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins the</p> <p>3 deposition of Joseph Oltmann. Today's date is</p> <p>4 September 8th, 2021. The time on the video is 10:04.</p> <p>5 Counsel, please identify yourselves for</p> <p>6 the record and state whom you represent.</p> <p>7 MR. CAIN: Charlie Cain for the Plaintiff.</p> <p>8 MS. DEFRANCO: Ingrid DeFranco and Andrea</p> <p>9 Hall for Mr. Oltmann.</p> <p>10 THE VIDEOGRAPHER: Will the court reporter</p> <p>11 please swear in the witness after her read.</p> <p>12 THE REPORTER: The attorneys participating</p> <p>13 in this deposition acknowledge that I am not physically</p> <p>14 present in the deposition room and that I will be</p> <p>15 reporting this deposition remotely. They further</p> <p>16 acknowledge that in lieu of an oath administered in</p> <p>17 person, the witness will verbally declare his testimony</p> <p>18 in this matter is under penalty of perjury. The parties</p> <p>19 and their counsel consent to this arrangement and waive</p> <p>20 any objections to this manner of reporting. Please</p> <p>21 indicate your agreement by stating your name and your</p> <p>22 agreement on the record, beginning with the taking</p> <p>23 attorney.</p> <p>24 MR. CAIN: Charlie Cain. I agree.</p> <p>25 MS. HALL: Andrea Hall and Ingrid</p> <p style="text-align: right;">Page 6</p>	<p>1 explain a couple of things to you.</p> <p>2 First of all, you are to not have any</p> <p>3 recording devices in your office. You are in your office,</p> <p>4 are you not?</p> <p>5 A. It doesn't matter where I am. It's not</p> <p>6 relevant.</p> <p>7 Q. You are in your office?</p> <p>8 A. It's not relevant.</p> <p>9 Q. Let me explain to you, sir, how this is</p> <p>10 going to go. I'm going to ask the questions. You're</p> <p>11 going to answer my questions. It's up to your counsel to</p> <p>12 advise you if they perceive that there's a privilege issue</p> <p>13 or some other reason that you shouldn't answer my</p> <p>14 questions.</p> <p>15 Are you in your office or not?</p> <p>16 A. (No Response.)</p> <p>17 MS. HALL: Objection, Charlie. It's not</p> <p>18 relevant. Move on.</p> <p>19 MR. CAIN: Are you instructing your client</p> <p>20 not to answer the questions where he's physically</p> <p>21 located?</p> <p>22 MS. HALL: Move on.</p> <p>23 MR. CAIN: Yes or no.</p> <p>24 MS. HALL: I said, Yes. Move on, Charlie.</p> <p>25 It's not relevant.</p> <p style="text-align: right;">Page 8</p>
<p>1 DeFranco. We agree.</p> <p>2 JOSEPH OLTSMANN,</p> <p>3 having been first duly sworn or affirmed, was examined and</p> <p>4 testified as follows:</p> <p>5 EXAMINATION</p> <p>6 BY MR. CAIN:</p> <p>7 Q. State your full name, please.</p> <p>8 A. Joseph Oltmann.</p> <p>9 Q. Mr. Oltmann, you understand you're here to</p> <p>10 give testimony as a result of a court order issued by</p> <p>11 Judge Moses in this case, correct?</p> <p>12 A. I do.</p> <p>13 Q. Part of what she asked us to do is to</p> <p>14 provide exhibits to you via your counsel. We did so last</p> <p>15 night. Those exhibits were to be printed out and put in a</p> <p>16 binder.</p> <p>17 Do you have a binder of exhibits in front</p> <p>18 of you?</p> <p>19 A. I do not. I have a computer screen with</p> <p>20 those up, though.</p> <p>21 Q. Mr. Oltmann, instead of being in person, we</p> <p>22 are obviously conducting this deposition via Zoom, so I'm</p> <p>23 not there to -- to look at what you're looking at or</p> <p>24 perceive any information that you're getting outside of</p> <p>25 the context of my questions and your answers. So let me</p> <p style="text-align: right;">Page 7</p>	<p>1 MR. CAIN: Don't talk over me.</p> <p>2 Q. (By Mr. Cain) It's important, Mr. Oltmann,</p> <p>3 that you and I understand each other. If there's some</p> <p>4 reason that you don't understand my questions, will you</p> <p>5 stop me, ask me to rephrase the question, so that I can be</p> <p>6 sure that you understand what I'm asking you and you're</p> <p>7 answering the question that I'm asking?</p> <p>8 A. Yes.</p> <p>9 Q. Are you recording -- do you have a</p> <p>10 recording device with you where you're sitted -- or</p> <p>11 seating now currently? Are you recording this?</p> <p>12 A. No. This is being recorded.</p> <p>13 Q. No, I understand that.</p> <p>14 My question is: Are you recording it</p> <p>15 separately?</p> <p>16 A. No.</p> <p>17 Q. Mr. Oltmann, you are to not communicate</p> <p>18 outside the parties during the course of this deposition.</p> <p>19 That would include getting instructions on how to answer</p> <p>20 questions from your counsel.</p> <p>21 Do you understand that?</p> <p>22 A. Yes.</p> <p>23 Q. I want only your testimony and your</p> <p>24 testimony alone. Who else is with you physically right</p> <p>25 now?</p> <p style="text-align: right;">Page 9</p>

<p>1 MR. CAIN: Charlie, I'm going to object to 2 this line of questioning. How is this relevant? You've 3 not done this with one other person that you've done a 4 deposition over Zoom with. So I suggest you start asking 5 questions because your time is running. 6 Q. (By Mr. Cain) Who else is with you 7 physically present -- 8 MR. CAIN: And I'm not going to allow 9 speaking objections, and I will ask for more time if you 10 keep it up. 11 Q. (By Mr. Cain) Who else is with you, 12 Mr. Oltmann? 13 A. My attorneys. 14 Q. Anyone else? 15 A. No. 16 Q. Mr. Oltmann, have you reviewed the 17 protective order that Judge Moses entered in this case? 18 A. No. 19 Q. Are you aware that there's a protective 20 order that would prohibit the disclosure of individuals 21 that were on the antifa call or your conduit to that call, 22 disclosure outside of these proceedings? Are you aware of 23 that? 24 A. Yes. 25 Q. Are you prepared to testify today regarding</p> <p style="text-align: right;">Page 10</p>	<p>1 media. Mr. Coomer was the one that was on that call. So 2 as a result of that, no protection order would protect 3 this individual. 4 Q. Who is the -- who is the person that was 5 your conduit? Give me the identity of that person. 6 Are you refusing to answer my question? 7 A. I answered your question already. You 8 just didn't like the answer. 9 Q. No. I didn't get the answer to the 10 question. The question was: Who is the person or persons 11 who served as the conduit for you to be on the antifa 12 call? Give me the name. 13 A. I gave you the information as it relates 14 to the information that's in my notes, and you have my 15 notes. So therefore you have that name. 16 Q. ? 17 A. No. 18 Q. All right. Who? 19 A. The information as to who gave me access 20 to that call is inside of the notes. 21 Q. All right. One of the documents that I 22 identified for you was Plaintiff's Exhibit 29, which I 23 understand to be your notes. 24 Do you have that? 25 A. Hold on one second.</p> <p style="text-align: right;">Page 12</p>
<p>1 the identity of your conduit to the antifa call? 2 A. Can you repeat that question again? 3 Q. Are you prepared to testify today 4 concerning the identity of the individual or individuals 5 who gave you access to the antifa call? 6 A. To a certain extent. 7 Q. To what extent? 8 A. To the extent that I give you what 9 information is readily available. 10 Q. Who provided you access -- what's the 11 identity of the individual or individuals who provided you 12 access to the antifa call? 13 A. I made a commitment not to disclose the 14 name of that person. Unfortunately, that person who is 15 known to me is actually in my notes. 16 Q. In the notes of the call? 17 A. Yes. 18 Q. Okay. Who is it? 19 A. That's all I'm going to say. 20 Q. You understand the Court has ordered you to 21 provide us that information. You understand that? 22 A. I'm not going to provide that information. 23 Q. I'm sorry? 24 A. Mr. Coomer is on this call. Mr. Coomer is 25 the one that presented the antifa manifesto in his social</p> <p style="text-align: right;">Page 11</p>	<p>1 MR. KIMREY: Mr. Cain, this is Blaine 2 Kimrey. Have these exhibits been provided to the other 3 counsel of record in this case? 4 MR. CAIN: Yes. 5 MR. KIMREY: I will note for the record 6 that I did not receive copies of these exhibits. I am 7 counsel for OANN and Chanel Rion. Can you have your 8 office forward to me a file of the exhibits right now? 9 MR. CAIN: No. I think, Blaine -- and 10 welcome to the case -- you should have the Exhibit Share 11 function and you can -- you can view them on that through 12 Veritext. But I don't want to waste time on the record 13 with this right now. 14 MR. KIMREY: Okay. Fair enough. 15 MR. CAIN: We can talk about it off-line. 16 Q. (By Mr. Cain) Do you have Exhibit 29 up, 17 Mr. Oltmann? 18 A. I'm actually not seeing Exhibit 29. 19 Q. It's a copy of your notes. 20 A. Okay. I'm looking at it now. 21 Q. All right. And these are notes, correct me 22 if I'm wrong, that you say were taken contemporaneously by 23 you while you were on that call; is that true? 24 A. Yes. 25 Q. Okay. And this is one, two, three -- four</p> <p style="text-align: right;">Page 13</p>

<p>1 pages of notes, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Where in your notes is the identity of your</p> <p>4 conduit to the call reflected?</p> <p>5 A. It is -- it is on this page, yes.</p> <p>6 Q. Which page? There's a Bates stamp -- what</p> <p>7 we call Bates stamp down on the bottom right. 205, 206,</p> <p>8 207, 208 are the page numbers on these notes. Which page?</p> <p>9 A. There's no stamp on this page. Oh, there</p> <p>10 it is. 205.</p> <p>11 Q. All right. So 205 starts, Who is Eric</p> <p>12 Dominion guy. Is that the one you're looking at?</p> <p>13 A. It is.</p> <p>14 Q. Denver, Colorado Springs, question mark?</p> <p>15 Then there's the . Who's ? If I'm reading that</p> <p>16 correctly. Does that say ?</p> <p>17 A. That is not -- that is not who gave me</p> <p>18 access to the call.</p> <p>19 Q. Who is n?</p> <p>20 A. He's an antifa member. He's a journalist,</p> <p>21 I think.</p> <p>22 Q. What's his last name?</p> <p>23 A. I don't know.</p> <p>24 Q. Was he on the call?</p> <p>25 A. I don't recall actually. I'd have to go</p> <p style="text-align: right;">Page 14</p>	<p>1 A. No.</p> <p>2 Q. -- well, actually before I move off of</p> <p>3 . Have you subsequently learned who this person is,</p> <p>4 ?</p> <p>5 A. Yes. It's an antifa member.</p> <p>6 Q. Okay. What do you know about her?</p> <p>7 A. Not a lot, actually.</p> <p>8 Q. All right. What do you know?</p> <p>9 A. Not a lot. I'd have to review my notes.</p> <p>10 Q. Is there something -- when you say your</p> <p>11 notes, are you referring to Exhibit 29 or some other</p> <p>12 notes?</p> <p>13 A. Just information that I would have</p> <p>14 on -- on her.</p> <p>15 Q. Okay. Are those reflected on Exhibit 29 or</p> <p>16 some other notes?</p> <p>17 A. It wasn't pertaining to any of this</p> <p>18 hearing, so I don't even -- I know that --</p> <p>19 THE REPORTER: I'm sorry, but there's too</p> <p>20 much background noise. I can't understand the witness.</p> <p>21 Could I have the answer repeated, please?</p> <p>22 THE DEPONENT: There's no noise on my</p> <p>23 side.</p> <p>24 Q. (By Mr. Cain) Can you repeat your answer?</p> <p>25 She didn't hear you. She needs to get it down for the</p> <p style="text-align: right;">Page 16</p>
<p>1 through my notes.</p> <p>2 Q. The next name is -- that appears to be a</p> <p>3 name is . Who is that?</p> <p>4 A. How do I get to the other pages?</p> <p>5 MS. HALL: Just scroll up.</p> <p>6 THE DEPONENT: Oh, scroll up. Okay. Got</p> <p>7 it.</p> <p>8 Q. (By Mr. Cain) Who is , that's the</p> <p>9 question I asked?</p> <p>10 A. is the name of somebody that came up</p> <p>11 on the call.</p> <p>12 Q. What do you mean? You saw a name appear?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Do you have a last name?</p> <p>15 A. No.</p> <p>16 Q. Do you know who she is?</p> <p>17 A. No.</p> <p>18 Q. Was this a Zoom? Was this a Zoom call?</p> <p>19 A. Yes.</p> <p>20 Q. So you could see the name of the</p> <p>21 participants that had logged into the call, at least with</p> <p>22 respect to , right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Did you see Eric Coomer on the Zoom</p> <p>25 call reflected?</p> <p style="text-align: right;">Page 15</p>	<p>1 record.</p> <p>2 A. I did collect notes on some of these</p> <p>3 people. So if I have notes on her, then it would</p> <p>4 be -- it wouldn't be in these notes, though.</p> <p>5 Q. Okay. But you do have notes reflecting</p> <p>6 some investigation of who she was?</p> <p>7 A. I have questions that I asked when I</p> <p>8 started contacting other people that were doing research</p> <p>9 on antifa specifically.</p> <p>10 Q. Okay. So do you have notes that reflect</p> <p>11 who she is -- who her identity is?</p> <p>12 A. I was -- I was never able to uncover who</p> <p>13 she is, specifically.</p> <p>14 Q. How about any organization she's involved</p> <p>15 with? Do you know that?</p> <p>16 A. Antifa.</p> <p>17 Q. The next name is with a question mark.</p> <p>18 Who are you referring to there? Is that your conduit?</p> <p>19 A. No.</p> <p>20 Q. Who is ? What information do you have</p> <p>21 on this person?</p> <p>22 A. He's an antifa member.</p> <p>23 Q. How do you know?</p> <p>24 A. Because he was on the call.</p> <p>25 Q. Do you have a last name?</p> <p style="text-align: right;">Page 17</p>

<p>1 A. No, no, not as it pertained to the 2 information I was able to collect here.</p> <p>3 Q. Well, why did you qualify that? Do you 4 have any identifying information on this who was on 5 the call?</p> <p>6 A. I was told by someone else that a man that 7 went by the name of died a couple months ago. He was 8 heavily involved in antifa.</p> <p>9 Q. Who told you that?</p> <p>10 MS. HALL: Object to form.</p> <p>11 Q. (By Mr. Cain) You can answer.</p> <p>12 A. It doesn't --</p> <p>13 THE REPORTER: I'm sorry. I just --</p> <p>14 A. I said it doesn't have to do with Eric.</p> <p>15 Q. (By Mr. Cain) Who told you that is the 16 question? You can answer the question.</p> <p>17 A. .</p> <p>18 Q. is the next name. And then there's 19 a dash knows.</p> <p>20 Is the conduit to your participation 21 on this call?</p> <p>22 A. No.</p> <p>23 Q. Do you know who is? Do you have a 24 last name or any other identifying information?</p> <p>25 A. He goes by the name of or He Page 18</p>	<p>1 information beyond what you told me about or 2 is that true?</p> <p>3 A. No, that's not true.</p> <p>4 Q. What other information do you have on this 5 person?</p> <p>6 A. That he's an antifa member.</p> <p>7 Q. You've already told me that. I said what 8 other information.</p> <p>9 A. I'm trying to find the information. So 10 hold on a second. I'll see if I can pull up a --</p> <p>11 Q. Tell me what you're doing when you're doing 12 it too. Are you on --</p> <p>13 A. I'm just searching files to see anything 14 that I have on or .</p> <p>15 Q. I only have so much time, so if you can't 16 find it now, then at a break we can see if we can pull 17 that information down.</p> <p>18 A. All right. Sounds good.</p> <p>19 Q. Then there's a dash knows. Who's ? 20 What do those initials stand for?</p> <p>21 What are you looking at, Mr. Oltmann?</p> <p>22 A. My attorney.</p> <p>23 Q. Who is ? The lawyer can't give you the 24 answer. I can't -- this is not their deposition. This is 25 your deposition. Page 20</p>
<p>1 seems to be an enforcer for the Antifa/BLM movement.</p> <p>2 Q. Were you able to identify this person 3 beyond that?</p> <p>4 A. To some degree, yes.</p> <p>5 Q. Okay. Tell me -- do you have an address? 6 Do you have a last name? What identifying information do 7 you have?</p> <p>8 A. Just information related to the fact that 9 he was not a journalist. I wasn't able to disqualify him 10 from being a journalist.</p> <p>11 Q. How?</p> <p>12 A. By looking up all known people that go by 13 or .</p> <p>14 Q. When you were looking up all known people 15 that go by or were you able to determine who 16 this person is specifically? Is he a mechanic in the 17 Springs?</p> <p>18 A. No. Because that's not what I was looking 19 for.</p> <p>20 Q. So if -- if you wanted to get in touch with 21 at this point -- or , you wouldn't know how to 22 do it?</p> <p>23 A. I didn't try to get in touch with an 24 antifa member. I didn't try.</p> <p>25 Q. Okay. So you -- you don't have any Page 19</p>	<p>1 A. I'm not sure you understand the 2 significance of what we're dealing with. As a matter of 3 fact, I don't think you care. So I'm going to answer 4 it -- I'm going to answer it this way. You asked me for 5 an answer, I'm going to give you an answer.</p> <p>6 In the last two weeks we've had two antifa 7 members that have targeted and tried to kill other 8 people. We have one that tried to assassinate a guy in 9 Olympia, Washington. We have another guy in California 10 that was hunted for stabbing someone at a protest, who is 11 a known antifa member.</p> <p>12 We have who's currently in 13 hiding and had to move locations twice in the last couple 14 of months due to antifa putting a hit out on his life.</p> <p>15 There's another gentleman that worked for Project Veritas 16 out of New York and in 2019/2020 had a posted bounty for 17 his head.</p> <p>18 And then there's the dark web of the 19 bounty that's currently on my head by antifa in Colorado 20 and other states. So you want me to divulge information 21 which, frankly, would need someone like Eric Coomer back 22 to this individual for retribution. And since we know 23 that the history of Coomer is to have retribution against 24 people, there's a hesitation on my side to divulge 25 anything based on the imminent danger to that particular Page 21</p>

<p>1 individual.</p> <p>2 MR. CAIN: Objection. Nonresponsive.</p> <p>3 Q. (By Mr. Cain) Who is ? And I'm going to</p> <p>4 ask the Court for more time if this continues. I want</p> <p>5 responses to my questions.</p> <p>6 A. I answered the question.</p> <p>7 Q. Who is ?</p> <p>8 A. I'm asking for the truth, and you can't</p> <p>9 handle the truth. Or you don't care about the trust,</p> <p>10 which is obvious by how you act in a courtroom and how</p> <p>11 you lie in your proceedings.</p> <p>12 Q. Who is ? Are you going to answer my</p> <p>13 question or not? What does that stand for?</p> <p>14 A. That stands for the individual that gave</p> <p>15 me access to the call.</p> <p>16 Q. What's the name?</p> <p>17 A. That's his name.</p> <p>18 Q. is his name?</p> <p>19 A. Is his name.</p> <p>20 Q. What's his last name?</p> <p>21 A. .</p> <p>22 Q. No, sir. That -- that's not his name.</p> <p>23 A. That's his --</p> <p>24 Q. Give me the name.</p> <p>25 A. That's the information I have on that</p> <p style="text-align: right;">Page 22</p>	<p>1 A. If you know anything about the antifa</p> <p>2 movement, everyone in antifa uses names -- other names.</p> <p>3 That is the name that he gave me.</p> <p>4 Q. What is Eric Coomer's antifa name?</p> <p>5 A. What do you mean Eric Coomer's antifa</p> <p>6 name?</p> <p>7 Q. You said everybody in antifa uses other</p> <p>8 names. What is his -- Eric Coomer's antifa name?</p> <p>9 A. I believe Eric Coomer loves his notoriety.</p> <p>10 I believe Eric Coomer is one that likes to be in the</p> <p>11 middle of the limelight. I believe Eric Coomer is the</p> <p>12 one that wants to be the one in charge. And frankly, on</p> <p>13 the call, no one knew -- or there were people that didn't</p> <p>14 know who he was because they asked who he was.</p> <p>15 Q. Sir, you're being evasive. I --</p> <p>16 A. That is not evasive. That is the answer</p> <p>17 to the question. You asked a question; I answered it.</p> <p>18 Q. I know. I asked a different question that</p> <p>19 you didn't answer.</p> <p>20 A. What was that?</p> <p>21 Q. So let me ask this question again.</p> <p>22 Are you in contact with --</p> <p>23 A. I'm not.</p> <p>24 Q. -- or not?</p> <p>25 When is the last time you spoke with this</p> <p style="text-align: right;">Page 24</p>
<p>1 individual.</p> <p>2 Q. Pardon?</p> <p>3 A. That is the information that I have on</p> <p>4 that individual.</p> <p>5 Q. That's the entirety of the information.</p> <p>6 You know this person by , period?</p> <p>7 A. I know that person by .</p> <p>8 Q. And you don't know his first name?</p> <p>9 A. I know that person by .</p> <p>10 Q. Do you know his actual first name or not?</p> <p>11 MS. HALL: Objection.</p> <p>12 Q. (By Mr. Cain) Let's quit playing games.</p> <p>13 MR. CAIN: Counsel, I'm asking a question.</p> <p>14 MS. HALL: He's answered you three times.</p> <p>15 A. I answered the question.</p> <p>16 MS. HALL: You don't like the answer. He</p> <p>17 told you he knows the individual by the initials .</p> <p>18 Q. (By Mr. Cain) Do you know his actual name,</p> <p>19 is the question.</p> <p>20 A. His name is . That is his name.</p> <p>21 Q. Do you know -- what's his last name?</p> <p>22 A. is his name. If you know anything</p> <p>23 by --</p> <p>24 Q. What is his last name, sir? What is his</p> <p>25 last name?</p> <p style="text-align: right;">Page 23</p>	<p>1 individual?</p> <p>2 A. Five months ago, six months ago.</p> <p>3 Q. Where does this person live?</p> <p>4 A. I do not know.</p> <p>5 Q. In Colorado?</p> <p>6 A. I do not know.</p> <p>7 Q. How did you get in touch with this person</p> <p>8 initially?</p> <p>9 A. He showed up at an FEC meeting.</p> <p>10 Q. Where?</p> <p>11 A. In Castle Rock, Colorado.</p> <p>12 Q. Is he a member of FEC?</p> <p>13 A. I do not know the answer to that.</p> <p>14 Q. Who would?</p> <p>15 A. I would have to check and see if the</p> <p>16 member --</p> <p>17 THE REPORTER: I'm sorry, sir. Just a</p> <p>18 moment. I'm sorry. I just didn't hear or understand the</p> <p>19 last part of the answer. Can you repeat, please?</p> <p>20 THE DEPONENT: I would have to check with</p> <p>21 FEC to see if they have a record of him in their</p> <p>22 memberships.</p> <p>23 Q. (By Mr. Cain) Can you do that for me since</p> <p>24 we're taking FEC's deposition tomorrow?</p> <p>25 A. Hold on.</p> <p style="text-align: right;">Page 25</p>

<p>1 Q. All right. I'm going to circle back to 2 what I was asking you about . Do you know this person's 3 actual name or not?</p> <p>4 MS. HALL: Object to form.</p> <p>5 A. He presented himself as .</p> <p>6 MR. CAIN: Objection. Nonresponsive.</p> <p>7 Q. (By Mr. Cain) My question is: Do you 8 know --</p> <p>9 MS. HALL: He answered the question. You 10 don't like the answer. That's your problem. You've 11 asked this question at least five times. He's answered 12 the question. And you keep asking the same question, and 13 you don't like the answer.</p> <p>14 MR. CAIN: Ms. Hall, you can guarantee 15 that I'm going to be asking for more time if you keep 16 interrupting my questions.</p> <p>17 Q. (By Mr. Cain) My question was: Do you 18 know his actual ID beyond these initials? Do you know his 19 name, and you're just not providing it to me?</p> <p>20 A. He was known to me as . He was very, 21 very careful and very, very scared about himself coming 22 out in any of this. I've already given you more 23 information than I think I'm probably -- that I've been 24 told I can give.</p> <p>25 Q. (By Mr. Cain) Told by whom?</p> <p style="text-align: right;">Page 26</p>	<p>1 phone number?</p> <p>2 THE REPORTER: I'm sorry. The answer?</p> <p>3 THE DEPONENT: I do not.</p> <p>4 Q. (By Mr. Cain) You said five or six months 5 ago was the last time you were in contact with him. Is 6 that your testimony?</p> <p>7 A. To the best of my recollection, yes.</p> <p>8 Q. How did you get in touch with him?</p> <p>9 A. Through a Signal.</p> <p>10 Q. What is his Signal handle?</p> <p>11 A. .</p> <p>12 Q. Have you produced your communications from 13 Signal to your counsel with ?</p> <p>14 MS. HALL: Objection. You're asking for 15 attorney-client privileged information. He's not 16 answering that question.</p> <p>17 MR. CAIN: No, I'm not asking for 18 attorney-client information. The fact of providing the 19 information to counsel isn't privileged.</p> <p>20 MS. HALL: Yes, it is.</p> <p>21 MR. CAIN: It doesn't fall under advice.</p> <p>22 Q. (By Mr. Cain) Do you have access to your 23 Signal communications with , Mr. Oltmann?</p> <p>24 A. No.</p> <p>25 Q. Why not?</p> <p style="text-align: right;">Page 28</p>
<p>1 MS. HALL: Objection.</p> <p>2 A. I've given -- I've answered your question.</p> <p>3 Q. (By Mr. Cain) No, you haven't.</p> <p>4 My question is this: You say he presented 5 himself as . That's fine. I understand your testimony 6 there. But my question wasn't how he presented himself. 7 My question was: Do you actually know his -- his full 8 name -- his identification and you're just not providing 9 that to me?</p> <p>10 A. I do not know his full name.</p> <p>11 Q. Do you know his first name?</p> <p>12 A. I've never verified his identity.</p> <p>13 Q. So you don't know his first name?</p> <p>14 A. He was known to me as . I've given you 15 the information of who he is.</p> <p>16 Q. isn't a first name. And my question is: 17 Do you know what the stands for?</p> <p>18 A. No.</p> <p>19 Q. Let's go about it that way. ?</p> <p>20 ? ? Do you know?</p> <p>21 A. I do not know what the stands for.</p> <p>22 Q. Do you know what the stands for? His 23 last name, perhaps?</p> <p>24 A. I do not know what the stands for.</p> <p>25 Q. Do you have contact information for him? A</p> <p style="text-align: right;">Page 27</p>	<p>1 A. Because Signal deletes after 5 minutes, 2 10 minutes. Those communications are deleted inside the 3 app.</p> <p>4 Q. So there -- there is information that you 5 have in terms of communications with your conduit that 6 have been deleted as a result of the use of the Signal 7 app? Is that your testimony?</p> <p>8 A. That's not what I said.</p> <p>9 Q. What's -- what's incorrect about my 10 statement?</p> <p>11 A. When someone communicates with you via 12 Signal, they set the standard for what can be kept inside 13 of that conversation.</p> <p>14 Q. Okay.</p> <p>15 A. It's a limitation of the technology.</p> <p>16 Q. I understand that. But my -- my question 17 was, there are communications or were between you and 18 that have been deleted?</p> <p>19 A. Not true.</p> <p>20 Q. So you still have them?</p> <p>21 A. I do not have them.</p> <p>22 Q. Because they have been deleted?</p> <p>23 A. That is not true. That is a play on words 24 by you. That is not what happened. What happened is, is 25 the app limitation is that those are deleted. When</p> <p style="text-align: right;">Page 29</p>

<p>1 someone communicates with you, they set the standard by 2 which you can keep those communications.</p> <p>3 Q. When did you initially contact -- or make 4 contact with ?</p> <p>5 A. End of July, I believe, early September.</p> <p>6 Q. 2020?</p> <p>7 A. Yes.</p> <p>8 Q. Describe the -- your initial contact with 9 this person.</p> <p>10 A. I was at a meeting. He walked up to me 11 and said that he was a part of antifa and he was leaving 12 it, and that it was not the same organization as when it 13 started and something to that effect. And I basically 14 glad handed him and said, I'm glad you're not a part of 15 antifa anymore. Shook his hand and told him to stick 16 around and get involved.</p> <p>17 I shook probably another 100, 150 other 18 people's hands at the same time. That was the first -- I 19 think that was the first time I met him.</p> <p>20 Q. How is it that -- well, just walk me 21 through the progression, Mr. Oltmann, that you shook his 22 hand at an FEC meeting in you said July or September.</p> <p>23 When was your next contact with him? Walk 24 me through that progression, please.</p> <p>25 A. He made a couple of attempts to contact</p> <p style="text-align: right;">Page 30</p>	<p>1 times, you didn't respond to those, then what happened 2 next?</p> <p>3 A. He showed up at another FEC meeting, which 4 was -- I think it was the beginning of September, to the 5 first week of September. And this time he walked up to 6 me again and said, you know, I've been trying to reach 7 out to you. I -- I can get you access to these -- 8 getting in the antifa call.</p> <p>9 Q. How did he know you wanted access?</p> <p>10 A. I don't think he knew that I wanted access 11 or didn't want access. He had just made a statement at 12 the previous conversation that he was a part of antifa 13 and that these people that are writing things about you, 14 they're antifa members inside of -- they're antifa 15 journalists.</p> <p>16 And so it piqued my interest before, but I 17 wasn't -- I was not surprised. And this time by telling 18 me he can give me access to that call, definitely piqued 19 my interest.</p> <p>20 Q. This FEC meeting that you just testified 21 about, was this also in Castle Rock?</p> <p>22 A. Yes.</p> <p>23 Q. Are those meetings -- do you have sign-ins 24 sheets or anything that would identify who attended the 25 meetings?</p> <p style="text-align: right;">Page 32</p>
<p>1 me.</p> <p>2 Q. How?</p> <p>3 A. Through Signal. I think -- let me -- let 4 me go back a little bit. I think through Signal. I 5 can't find any text communication from him, and I don't 6 think I gave him my email -- or my phone number. I know 7 he made a couple of -- he made a couple of attempts to 8 contact me, and I did not return his call or I did not 9 respond.</p> <p>10 Q. When he attempted to contact you, what was 11 he saying?</p> <p>12 A. I don't remember. I don't recall. I 13 probably get somewhere between 3 and 400 people in a 14 given week to try to contact me.</p> <p>15 Q. Did you ever communicate with him via cell 16 phone number?</p> <p>17 A. No.</p> <p>18 Q. Via email?</p> <p>19 A. No.</p> <p>20 Q. Via regular text?</p> <p>21 A. No.</p> <p>22 Q. All the communications with that weren't 23 in person were through Signal?</p> <p>24 A. I believe so. Yes.</p> <p>25 Q. So when he attempted to contact you a few</p> <p style="text-align: right;">Page 31</p>	<p>1 A. I think we started to do that, yes.</p> <p>2 Q. Do you still have FEC meeting sign-in 3 sheets from this time period?</p> <p>4 A. No.</p> <p>5 Q. Why not?</p> <p>6 A. Because they're not kept. They're written 7 in papers. We wouldn't keep those -- that information.</p> <p>8 Q. Well, you -- you acquire the information. 9 Do you then convert it into an electronic record?</p> <p>10 A. We take the emails and convert those into 11 electronic records, yes.</p> <p>12 Q. Okay. Did -- did provide an email?</p> <p>13 A. I do not know. I did tell you that I 14 would check the logs for members for the deposition 15 tomorrow.</p> <p>16 Q. All right. While you're at it, can you 17 also look at the sign-in sheets or however that's now 18 notated to see if you have information for ?</p> <p>19 MS. HALL: Charlie, just for the record, 20 he told you that he did not keep those. If anything, 21 there would be an email address. And he already 22 confirmed that he would look that up.</p> <p>23 A. I will check for that information, 24 nonetheless.</p> <p>25 Q. (By Mr. Cain) You said that he indicated</p> <p style="text-align: right;">Page 33</p>

<p>1 that he had some information on antifa journalists. Who 2 did he say he had information on? 3 A. I do not believe at that time he told me 4 about any one person in particular. 5 Q. Okay. What happened next with respect to 6 this guy? 7 A. He became more agitated. He contacted me 8 and told me what day that was going to happen, which I 9 don't recall the actual day. It was a pretty busy time 10 for us at FEC and a pretty busy time for us as a country. 11 I invited him to come to my office. 12 Q. Where you're sitting now? 13 MS. HALL: Objection. 14 Q. (By Mr. Cain) Is that where you -- you met 15 with him where you're sitting now? 16 MS. HALL: Objection, Charlie. I told you 17 it's not relevant and he's not answering the question. 18 Q. (By Mr. Cain) Are you going to not answer 19 my question? Did you meet with where you're sitting 20 now? 21 A. The purpose of this deposition being 22 remote is to protect me. I have to sit here for three 23 hours, and there is no way I'm going to disclose where I 24 am right now that could lead anybody on your side to 25 become here and do harm to me. So I will not divulge</p> <p style="text-align: right;">Page 34</p>	<p>1 Q. (By Mr. Cain) Let me ask you this way -- 2 MS. HALL: And whether or not he's there 3 now. 4 MR. CAIN: Ms. Hall, enough. 5 Q. (By Mr. Cain) Let me ask you this: You 6 said he was agitated, and you had a meeting with him, 7 correct? 8 A. Yes. 9 Q. Describe his appearance for me. 10 A. I'm sorry? 11 Q. If I need to pick him out of a line-up, 12 describe his appearance. How tall is he? What color of 13 hair? How old is he? What race or ethnicity? 14 A. This is unbelievable. 15 Q. Describe him. 16 They can't answer your questions. They can 17 make legal objections, not speaking objections. They 18 can't answer the questions that I'm asking you. This is 19 why I wanted this in the courthouse. 20 A. You want it in the courthouse because you 21 wanted to have me arrested. You said so in -- with 22 conferral with counsel. 23 Q. Describe -- 24 A. Exact words, actually. Even though in the 25 courtroom you lied to me.</p> <p style="text-align: right;">Page 36</p>
<p>1 where I'm -- 2 Q. Mr. Oltmann, you know what, I've listened 3 to you say our side wants to do harm to you -- 4 A. I am. 5 Q. -- multiple times. 6 You don't have any evidence of that, and 7 there's absolutely no reason we would want any harm to 8 come to you. I want you to be sitting there at -- during 9 trial. Okay? 10 Do you understand that? 11 A. You ask me a question; I'll answer the 12 question. You want to put your -- your 13 little -- whatever you want to call what you said, your 14 opinion, I have no interest in listening to you. 15 I will answer your questions. I'm here 16 for three hours to answer your questions. Not to be 17 badgered by some prick. So you figure out what questions 18 you want to ask me. You ask me those questions, and I 19 will answer those questions. 20 Q. Okay. Did you meet with there where 21 you're sitting? 22 MS. HALL: Objection. Charlie, I told 23 you, move on. He's not answering that question. You 24 already went down this road. And it's not relevant to 25 the issue of defamation where he met with this person.</p> <p style="text-align: right;">Page 35</p>	<p>1 Q. I did not say that. That's false. I did 2 not say that to your counsel. 3 MS. HALL: Charlie, I'm not going to get 4 into this during this deposition, but you did say that on 5 the phone. 6 MR. CAIN: I did not. 7 MS. HALL: Okay. Well -- 8 MR. CAIN: I never said I want to get him 9 arrested. And you're wasting my time. 10 Q. (By Mr. Cain) Describe the physical 11 appearance of . 12 A. . 13 Q. How old? 14 A. . 15 Q. Do you know his educational background, 16 where he went to school? 17 A. I do not. 18 Q. Do you know what he does for a living? 19 MS. HALL: Objection. Relevance. 20 Q. (By Mr. Cain) Do you know what he does for 21 a living? 22 A. I'm not going to answer that question. 23 Q. Do you know? 24 A. I'm not going to answer that question. 25 Q. Why not? This is identity of your conduit.</p> <p style="text-align: right;">Page 37</p>

<p>1 You're under a court order to answer these questions. 2 A. Oh, I'm very aware of that. 3 Q. Okay. 4 A. I'm also aware that the judge in this case 5 marched in June of 2020 in an antifa protest. I'm also 6 aware of that. 7 Q. And, in fact, you've called her an antifa 8 judge, haven't you? 9 MS. HALL: Charlie, what's the relevance 10 of this? Like, I mean, what he believes of the judge or 11 what he's done on his own time is not relevant to a 12 defamation case with your client Eric Coomer. 13 MR. CAIN: I don't think you know what is 14 relevant, and quit interrupting this. 15 MS. HALL: No. I have the ability to -- 16 Q. (By Mr. Cain) Haven't you referred to -- 17 MR. CAIN: No, we're going to get into 18 what is antifa and what isn't, which is highly relevant 19 to this. And he's called Eric Coomer a member of antifa. 20 We're going to talk about that. 21 Q. (By Mr. Cain) You've called the judge an 22 antifa judge, haven't you? I want to know what qualifies 23 someone to be part of antifa? 24 Why did you call the judge an antifa judge? 25 MS. HALL: Objection. Relevance.</p> <p style="text-align: right;">Page 38</p>	<p>1 A. Communicating with journalists, who are 2 antifa journalists, journalists that stand up for the 3 fascist/antifascist movement, would probably qualify them 4 as antifa. 5 Q. Anything else you can think of? You've 6 called the judge an antifa judge. That's why I'm asking 7 you what -- what about that would qualify -- our judge 8 would qualify her as part of antifa? 9 MS. HALL: Objection, Charlie. Move on 10 with this questioning with regard to the judge. It is 11 not relevant to your defamation case. 12 MR. CAIN: Yeah, it is. I want to know 13 what -- what makes someone antifa. 14 MS. HALL: But you keep referring -- 15 MR. CAIN: Calling my client -- I'm not 16 debating with you, Ms. Hall. 17 MS. HALL: Well, then I'm going to start 18 instructing my client not to answer your question. It's 19 not relevant to your lawsuit. What is going on with the 20 judge, what he said about the judge is not relevant to 21 Eric Coomer. 22 MR. CAIN: I'm talking about antifa. 23 MS. HALL: No, you're not. You keep 24 referring to the judge. 25 MR. CAIN: I'm not asking you, Ms. Hall.</p> <p style="text-align: right;">Page 40</p>
<p>1 Q. (By Mr. Cain) What makes someone a member 2 of antifa? That's the point of my question. 3 A. It's a pretty well-organized organization 4 for something they say isn't organized. 5 Q. Okay. But what makes someone part of 6 antifa? Are you going to answer my question? 7 You called the judge an antifa judge in our 8 case. You've referred to Dr. Coomer as a member of 9 antifa. What makes either of them part of antifa? 10 MS. HALL: Objection with regard to the 11 judge. 12 A. Eric being on an antifa call. Eric 13 putting up posts that were pro antifa, anti-American, 14 anti-police. Posting literally right after antifa put 15 the manifesto out there, the next day he posted it on his 16 social media. 17 Q. (By Mr. Cain) Anything else? 18 Marching in a rally, marching in a Black 19 Lives Matter protest, does that make someone a member of 20 antifa? 21 MS. HALL: Objection. Relevance. 22 A. I think being on an antifa call where you 23 say that somebody is not going to win, and you made sure 24 of it, probably makes you a part of antifa. 25 Q. (By Mr. Cain) We'll get to that.</p> <p style="text-align: right;">Page 39</p>	<p>1 Ms. Hall, we're trying to figure out in your client's 2 mind what makes someone a member of antifa. He's called 3 the judge an antifa judge because she marched in a -- 4 allegedly, I have no knowledge of this -- in a rally or 5 some form of a protest. 6 Q. (By Mr. Cain) What makes that -- take the 7 judge out of it. What makes someone who's involved in 8 that activity antifa? 9 MS. HALL: That's been asked and answered. 10 MR. CAIN: He hasn't answered it. 11 A. I did answer it. 12 Q. (By Mr. Cain) What makes someone, in your 13 mind, an antifa journalist? 14 A. A radical leftist that communicates openly 15 with other radical leftists that stand for antifa being 16 antifascist, who are then themselves are the racist 17 pedophiles and racists of our society. Typically white 18 extremist liberals. 19 Q. And they have to be racist and pedophiles? 20 Is that part of your definition? 21 A. This isn't a deposition. 22 Q. It is a deposition. 23 A. This is a battering session for you 24 because you don't like the fact that I call you out. And 25 I'm --</p> <p style="text-align: right;">Page 41</p>

<p>1 Q. I don't --</p> <p>2 A. I'm sorry I hurt your feelings.</p> <p>3 Q. I could care less about anything --</p> <p>4 A. Let's talk about -- let's talk about</p> <p>5 antifa and what antifa does. And let's talk about the</p> <p>6 qualifications of the judge because that's what you</p> <p>7 wanted to ask. So I'll talk about that.</p> <p>8 MS. HALL: No, don't.</p> <p>9 Q. (By Mr. Cain) No, sir. I just want</p> <p>10 answers, and you're being evasive.</p> <p>11 A. I'm not being evasive.</p> <p>12 Q. If you can't tell me who this person is</p> <p>13 that was your conduit beyond a with</p> <p>14 the initials .</p> <p>15 Do you have anything else going back to</p> <p>16 that would inform me on who this person is?</p> <p>17 A. No.</p> <p>18 Q. You would not identify where he works.</p> <p>19 A. I don't know where he works. And that</p> <p>20 wasn't your previous question.</p> <p>21 Q. Did you ever know where he was employed?</p> <p>22 A. No.</p> <p>23 Q. Do you have any employment information on</p> <p>24 him?</p> <p>25 A. No.</p> <p style="text-align: right;">Page 42</p>	<p>1 A. -- so this person is put in danger.</p> <p>2 Q. Not true.</p> <p>3 A. If you put the person in danger, you hope</p> <p>4 to punish this person the same way that I'm being</p> <p>5 punished with a court order --</p> <p>6 Q. Sir?</p> <p>7 A. The same way that the couple thousand</p> <p>8 people that have signed affidavits across the country</p> <p>9 have been punished and threatened.</p> <p>10 Q. You have no evidence that we want to do</p> <p>11 anything like that and nothing could be further from the</p> <p>12 truth.</p> <p>13 What I want to know is what happened on</p> <p>14 this call, and who got you on it and who else was there,</p> <p>15 which you haven't provided to anyone at this point. So</p> <p>16 that's why I'm asking these questions.</p> <p>17 Do you know friends or family of this ,</p> <p>18 and you're just not telling me?</p> <p>19 Are you refusing to give me that</p> <p>20 information?</p> <p>21 A. (No response.)</p> <p>22 Q. Okay.</p> <p>23 A. I don't want to speculate.</p> <p>24 Q. Did your counsel just provide you with</p> <p>25 information? I didn't -- I couldn't hear it, but off</p> <p style="text-align: right;">Page 44</p>
<p>1 Q. Do you know what city he lived in during</p> <p>2 the period of time you were dealing with him?</p> <p>3 A. .</p> <p>4 Q. Do you know anybody else who knows him,</p> <p>5 friends of his, family?</p> <p>6 A. I've given you all the information on him.</p> <p>7 That is what I'm under a court order to disclose, and</p> <p>8 I've disclosed that.</p> <p>9 Q. You didn't answer my question.</p> <p>10 Do you know any of his friends,</p> <p>11 people -- other people who know him? Family members?</p> <p>12 Either you know it or you don't.</p> <p>13 A. (No response.)</p> <p>14 Q. I'm going to reclaim this time at some</p> <p>15 point. So there's no point in you just sitting there and</p> <p>16 not responding to me.</p> <p>17 Do you know the answer to my question?</p> <p>18 A. (No response.)</p> <p>19 Q. Family members? Friends?</p> <p>20 A. (No response.)</p> <p>21 Q. I'm taking by your silence that you do. Do</p> <p>22 you know, sir?</p> <p>23 A. I know that the goal of this is to uncover</p> <p>24 this individual, so this --</p> <p>25 Q. Absolutely.</p> <p style="text-align: right;">Page 43</p>	<p>1 camera I want to make sure that Ms. Tubbs got that.</p> <p>2 MS. HALL: I told him not to speculate.</p> <p>3 THE REPORTER: I cannot hear the</p> <p>4 whispering.</p> <p>5 Q. (By Mr. Cain) Okay. But I'm not asking</p> <p>6 you to speculate.</p> <p>7 THE REPORTER: I cannot hear the</p> <p>8 whispering.</p> <p>9 A. He did not show up to these meetings</p> <p>10 alone.</p> <p>11 Q. (By Mr. Cain) Okay. Who did he show up</p> <p>12 with.</p> <p>13 A. I don't know.</p> <p>14 Q. Describe him. Same person? Multiple</p> <p>15 people?</p> <p>16 A. No. The same person, yes.</p> <p>17 Q. What's the name of the person he showed up</p> <p>18 with?</p> <p>19 A. I don't remember.</p> <p>20 Q. Male or female?</p> <p>21 A. Male.</p> <p>22 Q. Friend?</p> <p>23 A. I assume so.</p> <p>24 Q. Okay. So you know he has a friend that</p> <p>25 showed up at the meetings. Is that person still part of</p> <p style="text-align: right;">Page 45</p>

<p>1 FEC? Does he show up at meetings still?</p> <p>2 A. He was not an FEC person, I think they</p> <p>3 brought him in. I think it's just another person that</p> <p>4 came with him.</p> <p>5 Q. Okay. But this other individual -- do you</p> <p>6 know who they are? Are they showing up at FEC meetings?</p> <p>7 A. No.</p> <p>8 Q. Okay.</p> <p>9 A. And I'm not at many of the FEC meetings</p> <p>10 currently.</p> <p>11 Q. All right. So you said that -- you</p> <p>12 mentioned that was agitated during one of your meetings</p> <p>13 where you, I guess, won't identify where you were at at</p> <p>14 this particular meeting.</p> <p>15 But what was he agitated about,</p> <p>16 Mr. Oltmann?</p> <p>17 A. So maybe agitated is probably the wrong</p> <p>18 word. Scared, paranoid. Wouldn't meet me for coffee at</p> <p>19 a coffee shop. Would make sure that I was -- he was</p> <p>20 10 minutes late. I would ask him questions about, you</p> <p>21 know, who he is as a person. Typical things that I would</p> <p>22 do when trying to mentor someone who I think is going</p> <p>23 down the wrong path.</p> <p>24 Q. Okay. And then how did this develop to him</p> <p>25 getting you on an antifa call, as you define it?</p> <p style="text-align: right;">Page 46</p>	<p>1 through when he grew up, and that they would be dragged</p> <p>2 into something like this that would take him down a path</p> <p>3 that he couldn't get them off of.</p> <p>4 Q. Did you learn whether he was married or</p> <p>5 not?</p> <p>6 A. He's in a relationship, yes.</p> <p>7 Q. Do you know who his partner is?</p> <p>8 A. I have not.</p> <p>9 Q. Never met him or her?</p> <p>10 A. I have not.</p> <p>11 Q. All right. So this -- this</p> <p>12 getting-to-know-you process occurred during what period of</p> <p>13 time? The summer of 2020?</p> <p>14 A. No. It happened -- it went back in time</p> <p>15 and said July to September, I met with him a couple</p> <p>16 times. It was a pretty busy time given all the unrest</p> <p>17 that was happening in Denver.</p> <p>18 Q. Okay. Then where did the idea come that he</p> <p>19 would provide you access to a call?</p> <p>20 A. At first he said that he didn't have the</p> <p>21 information for when the call would occur. And I believe</p> <p>22 he called me a couple days before the call to ask me</p> <p>23 questions, and then we had the -- the call itself.</p> <p>24 Now, I did attempt to -- I think I can</p> <p>25 divulge this. I did attempt to gather the information</p> <p style="text-align: right;">Page 48</p>
<p>1 A. I don't understand the question.</p> <p>2 Q. Well, you were meeting with him. You said</p> <p>3 you had coffee. He was scared and paranoid. I want you</p> <p>4 to walk me through the history of -- of your relationship</p> <p>5 with this person and how he got you on the call.</p> <p>6 A. And the history was pretty vanilla. I met</p> <p>7 with him for coffee, as I do many people. I met with him</p> <p>8 at a park. Just having conversations about who he is, to</p> <p>9 validate who he is, up to the point where I was on the</p> <p>10 call. I think it was more for -- as much for him as it</p> <p>11 was for me.</p> <p>12 Q. What did you learn about him that you</p> <p>13 haven't testified to during this getting-to-know-you</p> <p>14 process? You said you were at a park. You learned about</p> <p>15 who he is. What did you learn?</p> <p>16 A. I learned that he has family members that</p> <p>17 are part of antifa.</p> <p>18 Q. And? Is that it?</p> <p>19 A. I learned that he just wanted to do good</p> <p>20 and he thought that antifa was truly doing good.</p> <p>21 Q. Okay. Anything else?</p> <p>22 A. I learned that he had kids.</p> <p>23 Q. Is he married?</p> <p>24 A. And I learned that his fear is, is that</p> <p>25 his kids would grow up under the same thing that he went</p> <p style="text-align: right;">Page 47</p>	<p>1 related to that call some months later.</p> <p>2 Q. What do you mean? I don't understand that.</p> <p>3 A. I attempted to contact Zoom and see if</p> <p>4 they could, given a certain period of time, find out --</p> <p>5 and given a certain IP address or bank of IPs -- how I</p> <p>6 could recover that particular call.</p> <p>7 Q. Why? Why did you do that?</p> <p>8 A. To have more concrete, tie it down to the</p> <p>9 actual number itself or access code that would give me</p> <p>10 access to that information so that I could then subpoena</p> <p>11 that information for -- access that information related</p> <p>12 to this.</p> <p>13 Q. And did Zoom provide any information to you</p> <p>14 that was of use?</p> <p>15 A. No. But it's well-documented.</p> <p>16 Q. What do you mean?</p> <p>17 A. It's documented. I went to someone within</p> <p>18 my company and asked that person to do this research for</p> <p>19 me.</p> <p>20 Q. Do you have some record of the research</p> <p>21 results?</p> <p>22 A. I can check. I don't think so, but I can</p> <p>23 check. I'm sure that there's conversations that happened</p> <p>24 related to it, yes.</p> <p>25 Q. All right. If you can put that on your</p> <p style="text-align: right;">Page 49</p>

<p>1 list, I'd like to get that information if it's available.</p> <p>2 All right. So when -- did you -- did you</p> <p>3 get a sense from that he had been on calls like this in</p> <p>4 the past and, therefore, thought this particular call</p> <p>5 would be of interest to you? Describe how, you know, that</p> <p>6 came about.</p> <p>7 A. Oh, at that point the only focus was</p> <p>8 antifa journalists. That is the only focus I had</p> <p>9 throughout the entire thing is the things that people</p> <p>10 were saying about me.</p> <p>11 Q. You didn't like what was being written</p> <p>12 about you by certain members of the media at the time?</p> <p>13 A. I don't think it was as much being written</p> <p>14 about me as it was being written about FEC United.</p> <p>15 Q. Okay. And who were the journalists that</p> <p>16 bothered you in particular?</p> <p>17 A. Be , down in Colorado Springs.</p> <p>18 .</p> <p>19 Q. Okay. Anyone else?</p> <p>20 A. Yeah. Eric -- I don't know how to say his</p> <p>21 last name.</p> <p>22 Q. [phonetic]?</p> <p>23 A. . Oh, yeah, you know him, huh?</p> <p>24 Q. Anyone else?</p> <p>25 A. Yeah. I don't know if</p> <p style="text-align: right;">Page 50</p>	<p>1 the identity of the people that were on the call itself.</p> <p>2 A. I believe if you check my notes, you will</p> <p>3 walk, through, and I started putting down information</p> <p>4 related to who I thought was on the call.</p> <p>5 Q. Okay. Let's do that, then. Let's segue</p> <p>6 into that. We'll come back to how you got on the call in</p> <p>7 a minute. I can't define from your notes who was on the</p> <p>8 call or who was just being discussed.</p> <p>9 So referring to Plaintiff's Exhibit 29,</p> <p>10 your notes, who was it that you can say for a fact was on</p> <p>11 the call, journalists or otherwise, besides yourself, and</p> <p>12 as you claim, Mr. Coomer?</p> <p>13 A. Well, the information from that call led</p> <p>14 me to information about . I thought she was</p> <p>15 on that call, but then again, nobody used names on the</p> <p>16 call. No one used names. The only one that popped up</p> <p>17 was the that popped up. And I wrote that down as it</p> <p>18 came up.</p> <p>19 Q. Okay. You've said, I think in the past,</p> <p>20 that you thought there were about 15 to 20 people on the</p> <p>21 call while you were on the call; is that right?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Why can't -- I'm sorry. Go ahead.</p> <p>24 A. Go ahead.</p> <p>25 Q. So why can you not positively identify</p> <p style="text-align: right;">Page 52</p>
<p>1 was before or after. But I certainly know that</p> <p>2 he's affiliated with antifa.</p> <p>3 Q. So he too is an antifa journalist?</p> <p>4 A. I guess you could call him that.</p> <p>5 Q. All right. I'm not going to call him that.</p> <p>6 I asked you the question.</p> <p>7 A. I mean, in my opinion I would call him</p> <p>8 that, yes, I would call him an antifa journalist.</p> <p>9 Q. Okay. So I've heard the storey before, of</p> <p>10 course, that you were concerned about these journalists</p> <p>11 and what they were saying about you. So is it fair then</p> <p>12 to say that your -- your interest in was, he was going</p> <p>13 to be able to put you on a call with some of these</p> <p>14 journalists who were writing bad things about you?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And in were any of these journalists</p> <p>17 that you mentioned actually on this Zoom call?</p> <p>18 A. There -- there was a couple journalists on</p> <p>19 there, but they weren't doing -- and I only take this by</p> <p>20 the friendliest comment related to the call. I was</p> <p>21 somewhat underwhelmed by the conversations because it was</p> <p>22 filled with rhetoric. But it was fascinating because of</p> <p>23 the planning and the fact that they were very, very well</p> <p>24 organized on how they communicated on these calls.</p> <p>25 Q. All I'm asking you about right now is -- is</p> <p style="text-align: right;">Page 51</p>	<p>1 being on the call, or can you?</p> <p>2 A. I cannot because no one had names to</p> <p>3 verify that. So the only names that came up during this</p> <p>4 are the names that I wrote down.</p> <p>5 Q. Well, you wrote down . Did you write</p> <p>6 at one point?</p> <p>7 A. I suspected that that was the person that</p> <p>8 was beginning to speak at the beginning of the call.</p> <p>9 Q. What do you -- what do you recall her</p> <p>10 saying?</p> <p>11 A. The -- that particular person was talking</p> <p>12 about the Colorado Springs Independent, which is why I</p> <p>13 thought that was because it sounded like , but</p> <p>14 I wasn't sure. So the more that that person talked, the</p> <p>15 more I wrote down information related to that person to</p> <p>16 hone in on that particular conversation.</p> <p>17 Q. Okay. Did you ever learn subsequent to</p> <p>18 this call whether it was , in fact, that was on the</p> <p>19 call?</p> <p>20 A. You mean did I definitively say that that</p> <p>21 was him?</p> <p>22 Q. Yes.</p> <p>23 A. I don't think that -- I think I was able</p> <p>24 to validate that he was an antifa journalist, yes.</p> <p>25 Q. I'm just asking -- you did research after</p> <p style="text-align: right;">Page 53</p>

<p>1 this call on Dr. Coomer. Did you research -- do any 2 research to try to authenticate whether was on the 3 call or not?</p> <p>4 A. I authenticated as being an antifa 5 journalist based on this conversation and this call, yes.</p> <p>6 Q. Okay. That's a different answer to the 7 question I asked. Did you do any research --</p> <p>8 A. I did -- I did do research on , 9 yes.</p> <p>10 Q. Okay. As you sit here today, what level of 11 certainty do you have as to whether she was on the call or 12 not?</p> <p>13 A. I don't. I don't have a level of 14 certainty. I have a level of certainty that she is an 15 antifa journalist.</p> <p>16 Q. Okay.</p> <p>17 A. If I had to give you a degree of 18 certainty, that degree of certainty would probably be in 19 the 70 to 80 percent range.</p> <p>20 Q. I don't know the pronoun of this person. 21 He or she was on the call, you would say you're 70 to 22 80 percent certain of that?</p> <p>23 A. I'm taking a wild guess.</p> <p>24 Q. That's your best -- best estimate based on 25 your perception in what you've learned about ; Page 54</p>	<p>1 Q. All right. From your notes, can you 2 identify anybody else -- or actually, I'm not going to 3 hamstring you to your notes. But either through referring 4 to your notes from the call or other observations, can you 5 identify anyone else who you can testify with certainty 6 was on the call?</p> <p>7 A. Eric Coomer.</p> <p>8 Q. We'll get to Mr. Coomer -- Dr. Coomer in a 9 minute, but excluding him, because that's obviously in 10 dispute. Anybody other than, as you say, Dr. Coomer and 11 yourself that you can identify as having been on this 12 call?</p> <p>13 A. I think that they do that on purpose where 14 they hide their identities on these calls. If you'll 15 look at subsequent disclosures of antifa communication 16 across the country, this is -- what I'm telling you right 17 now about their communication on this particular call, 18 and how they spread out communication across different 19 devices and different platforms, is that they often use 20 either names -- code names or don't use any names at all 21 in order to -- in order to have those conversations as 22 anonymous as possible.</p> <p>23 Q. That's an explanation, but it's not -- it's 24 not an answer to what I asked you. I said: Is there 25 anyone else on this call that you can identify with Page 56</p>
<p>1 is that fair?</p> <p>2 A. I would say that is a pretty 3 disgusting human being, and I learned a lot about 4 .</p> <p>5 Q. That's not responsive. I was saying that's 6 your best estimate based on participating in this call and 7 what you subsequently learned, you're about 70 to 8 80 percent sure that was on this call; is 9 that fair?</p> <p>10 A. The basis for this call was to uncover 11 antifa journalists. During the course of this call, I 12 uncovered an antifa journalist, a person that actively is 13 an activist rather than a journalist that writes slanted 14 and defamatory articles about people of the opposite 15 political affiliation. That is what I learned by this. 16 I learned that this person is, in fact, an antifa 17 journalist.</p> <p>18 Q. But that -- again, sir, that's not what I 19 was asking you. You had said -- I had asked you how 20 certain you were that she was on this call, and you said 21 you're about 70 to 80 percent certain that she was 22 actually a participant.</p> <p>23 And my question is: Is that your 24 testimony? Is that a fair estimate?</p> <p>25 A. That's me taking a wild guess. Page 55</p>	<p>1 certainty by name?</p> <p>2 A. Eric Coomer.</p> <p>3 Q. A code name or -- or anything like that. I 4 just want to know who could authenticate, besides 5 yourself, and as you would say, Dr. Coomer since you claim 6 he was on the call. But who can -- who can you 7 authenticate that was on the call so that we could talk to 8 them about what occurred?</p> <p>9 A. Well, if Eric Coomer wasn't on the call, 10 why did he clean up all of his social media platforms? 11 Totally wipe the internet of his name or -- or any of 12 the --</p> <p>13 Q. That's not a response to my question.</p> <p>14 A. Let me finish. You asked me a question, 15 and I get to answer that question. Now, at the end of me 16 answering that question, if you want to ask me or tell me 17 that that's not answering the question --</p> <p>18 Q. I didn't ask you about Eric Coomer deleting 19 anything. I asked you, who can you identify with 20 certainty was on the call?</p> <p>21 A. And I answered that question with 100 22 percent certainty that Eric Coomer was on that call.</p> <p>23 Q. And I already told you we're going to deal 24 with that in a minute. I want to know, other than 25 yourself, and as you claim Dr. Coomer, is there anyone Page 57</p>

<p>1 that you can say was on the call with certainty?</p> <p>2 A. I mean, I know for certainty that other</p> <p>3 people were on the call, yes. But I don't know for</p> <p>4 certainty the direct identity of those people.</p> <p>5 Q. So you were -- it's now a year since</p> <p>6 you -- approximately, since you say this call occurred.</p> <p>7 And a year later, as you sit here, you cannot identify a</p> <p>8 single person other than Dr. Coomer, as you claim, and</p> <p>9 yourself that was on this call; is that true?</p> <p>10 A. I'm -- I'm fairly sure that of the other</p> <p>11 people that were on this call, that if I had -- if I had</p> <p>12 to take a guess -- and the problem with taking a guess</p> <p>13 and pinpointing those people is that I did an amazing</p> <p>14 amount of research on antifa journalists to find more</p> <p>15 information that would corroborate the fact that they</p> <p>16 were, in fact, acting as a proxy for the antifa movement.</p> <p>17 So at the time this was not my focus. My</p> <p>18 focus was not who necessarily is on the call. My focus</p> <p>19 was on the people that were out there actively writing</p> <p>20 things about FEC and others that correlated with antifa</p> <p>21 and were doing so, in other words, because they were</p> <p>22 politically motivated.</p> <p>23 So at the time, my whole thing was to</p> <p>24 un-demask antifa journalists. I used this as a catalyst</p> <p>25 to do that. So to my mindset when all this occurred was</p> <p style="text-align: right;">Page 58</p>	<p>1 involvement in writing a Marxist manifesto herself.</p> <p>2 Q. Okay. Thank you. We're building a list.</p> <p>3 You have certainty with respect to two</p> <p>4 individuals: Yourself and Dr. Coomer. You have a high</p> <p>5 level of certainty with respect to .</p> <p>6 Is there anyone else that you can identify</p> <p>7 with either certainty or a high level of certainty that</p> <p>8 you believe was on this call?</p> <p>9 A. The interesting part about -- and if I can</p> <p>10 clarify the information about . The interesting</p> <p>11 part about is that she had been communicating on</p> <p>12 Twitter with another individual dating back to June of</p> <p>13 2020 by the name of , . Back</p> <p>14 into June of last year, I believe, they were</p> <p>15 communicating via Twitter, underneath,</p> <p>16 on the Twitter account.</p> <p>17 This has continued all the way into 2021</p> <p>18 where , just -- I guess you could say it's a</p> <p>19 coincidence by your -- by your terms -- is still</p> <p>20 communicating with on Twitter.</p> <p>21 So if -- if I had to just correlate those</p> <p>22 two together, that would -- we've been able to do a lot</p> <p>23 of research on , and so I would say that</p> <p>24 there's a high likelihood based on all that information.</p> <p>25 Again, I don't want to say 100 percent of</p> <p style="text-align: right;">Page 60</p>
<p>1 strictly to get as much information as possible so that I</p> <p>2 knew that I could identify those people that were inside</p> <p>3 of our journalist environment who are really just</p> <p>4 actively antifa members that were just defaming and</p> <p>5 slandered people because they didn't agree with them on</p> <p>6 a political level.</p> <p>7 Q. That's an explanation, but it's not an</p> <p>8 answer to my question.</p> <p>9 A. Well, it actually is an answer because the</p> <p>10 answer that I gave you directly correlates to the fact</p> <p>11 that I was looking for evidence that these were actually</p> <p>12 people that were inside of the journalistic environment.</p> <p>13 I found that. I used that information in order to go</p> <p>14 down a path to figure out who these people are.</p> <p>15 Q. You can't tell me another person that was</p> <p>16 on this call, can you, other than yourself, and as you</p> <p>17 claim, Dr. Coomer?</p> <p>18 A. I have a pretty high degree of likelihood</p> <p>19 that was on that call.</p> <p>20 Q. Okay.</p> <p>21 A. I have a high --</p> <p>22 Q. Understood that?</p> <p>23 A. -- high likelihood correlates to</p> <p>24 massive involvement in the antifa movement,</p> <p>25 a massive involvement in our revolution, a massive</p> <p style="text-align: right;">Page 59</p>	<p>1 the -- of the time that this the smoking gun. I think</p> <p>2 that antifa members are very careful not to have smoking</p> <p>3 guns as you'll see in this election, but -- although I do</p> <p>4 think there are some. But I would use that as a</p> <p>5 correlation to Coomer being on the call and having</p> <p>6 a probability of being on that call.</p> <p>7 Q. And the Coomer you're referring to, though,</p> <p>8 in that -- in your last part of your answer is</p> <p>9 ?</p> <p>10 A. No. The last part of my answer is</p> <p>11 communicating with via Twitter, and</p> <p>12 the correlation of Eric from Dominion being on that call.</p> <p>13 And the fact that I had written down, first off, in my</p> <p>14 notes, that is this Navy, probably inside of</p> <p>15 my notes on page 1.</p> <p>16 Q. Okay. You lost me with respect to the</p> <p>17 aspect. My question wasn't about the</p> <p>18 Twitter communications. My question was who with a high</p> <p>19 degree of certainty or certainty can you identify as being</p> <p>20 on the call?</p> <p>21 A. Well, has paid a lot of</p> <p>22 attention to me over the last nine months and has gotten</p> <p>23 into --</p> <p>24 Q. No, sir. I -- I'm not asking about</p> <p>25 You've already identified her as someone. So I'm asking</p> <p style="text-align: right;">Page 61</p>

<p>1 for anyone else.</p> <p>2 A. No.</p> <p>3 Q. No. That's it?</p> <p>4 A. I gained more information as this</p> <p>5 progressed. But, no --</p> <p>6 Q. Okay.</p> <p>7 A. -- on this call.</p> <p>8 Q. And are you saying that has</p> <p>9 some relation to Dr. Eric Coomer?</p> <p>10 A. I'm not saying anything at this point.</p> <p>11 Q. Do you know if -- I had understood</p> <p>12 someone -- well, strike that.</p> <p>13 Do you know whether he's related to</p> <p>14 Dr. Coomer?</p> <p>15 MS. HALL: Objection.</p> <p>16 A. I don't know. I mean, I was told</p> <p>17 that -- that -- that there was a relation, but I'm yet to</p> <p>18 fully verify that.</p> <p>19 Q. (By Mr. Cain) All right. So --</p> <p>20 MS. HALL: Charlie, could we take a break?</p> <p>21 MR. CAIN: Yeah, that's fine. How long</p> <p>22 have we been on the record?</p> <p>23 THE VIDEOGRAPHER: One hour, 19 minutes.</p> <p>24 MR. CAIN: Yeah, let's -- let's take a</p> <p>25 break.</p> <p style="text-align: right;">Page 62</p>	<p>1 like a phone had -- had some damage to -- done to it. Is</p> <p>2 that what you're referring to? You had some damage to</p> <p>3 your phone?</p> <p>4 A. I was asked to provide a picture of the</p> <p>5 damaged phone. I was asked to provide a picture for the</p> <p>6 new contract when I had the phone replaced. I replied --</p> <p>7 I gave that information as a request, I think on your</p> <p>8 side or the Court's side, to provide that information</p> <p>9 relevant to what information I was or was not able to</p> <p>10 recover on the phone.</p> <p>11 Q. Okay. And I -- and you've said many times</p> <p>12 you're a tech guy. I'm not. In terms of the Signal app,</p> <p>13 you have that installed on your phone currently, right?</p> <p>14 A. I do.</p> <p>15 Q. But you weren't able to recover the contact</p> <p>16 that you had for in order to provide us with a number</p> <p>17 that -- that you were given, the actual cell number?</p> <p>18 A. No. So I don't know the technology for</p> <p>19 this specifically, but if somebody removes you, then you</p> <p>20 will not see them in your contacts.</p> <p>21 Q. And you don't have any other record of the</p> <p>22 cell phone number for ?</p> <p>23 A. I was never contacted on a cell phone</p> <p>24 record, no.</p> <p>25 Q. Well, I know. But when you -- when you</p> <p style="text-align: right;">Page 64</p>
<p>1 THE VIDEOGRAPHER: Going off the record.</p> <p>2 The time is 11:23.</p> <p>3 (Discussion off the record.)</p> <p>4 (Recess from 11:23 a.m. to 11:42 a.m.)</p> <p>5 THE VIDEOGRAPHER: We're back on the</p> <p>6 record. The time is 11:42.</p> <p>7 Q. (By Mr. Cain) All right. Mr. Oltmann, I</p> <p>8 want to kind of pick up where we left off. But before I</p> <p>9 do that, I had a note here -- I looked at my Signal app</p> <p>10 during the break and observed that it's phone</p> <p>11 number-based. And so if -- did you say you still have</p> <p>12 access to your Signal app and to where you can provide</p> <p>13 us with his phone number?</p> <p>14 A. No. I did try -- I did try to recover</p> <p>15 that information through counsel.</p> <p>16 Q. What happened to the information?</p> <p>17 A. I believe my phone was replaced sometime</p> <p>18 in the middle of my security and there were a number of</p> <p>19 changes. So if someone removed you as a contact, you</p> <p>20 don't have access to that information. But I went</p> <p>21 through and scoured it looking for any conversations that</p> <p>22 I had during that time period, and that -- at the request</p> <p>23 of counsel.</p> <p>24 Q. So let me make sure I understand. I know</p> <p>25 there were some pictures that we were provided that looked</p> <p style="text-align: right;">Page 63</p>	<p>1 associate someone on Signal, you have to -- you get their</p> <p>2 cell number. They have to provide that information. So</p> <p>3 at one point you had it.</p> <p>4 A. I don't believe that you're correct. I</p> <p>5 believe that you can use -- you do not have to use your</p> <p>6 cell phone number in order to log in to Signal. I don't</p> <p>7 believe that that is a requirement.</p> <p>8 Q. If you wanted to contact now, how would</p> <p>9 you go about doing so?</p> <p>10 A. I have been trying. Knowing that I was</p> <p>11 going to have this information, I was trying.</p> <p>12 Q. Okay. What -- what efforts have you gone</p> <p>13 to? When you said you've been trying, what have you done</p> <p>14 specifically?</p> <p>15 A. I've reached out to people that have</p> <p>16 information about antifa members. I've reached out to</p> <p>17 people that are deep in the researching or investigations</p> <p>18 of antifa members. I've asked if they could uncover</p> <p>19 information that would lead to them to have a</p> <p>20 conversation with this individual, or any information</p> <p>21 that I did disclose could put this person in danger.</p> <p>22 THE REPORTER: I'm sorry. I'm having</p> <p>23 trouble understanding and hearing the deponent. Could</p> <p>24 you get closer to the phone or the computer to pick you</p> <p>25 up better?</p> <p style="text-align: right;">Page 65</p>

<p>1 THE DEPONENT: All right. Is that better?</p> <p>2 THE REPORTER: Yes.</p> <p>3 MR. CAIN: Yes.</p> <p>4 THE DEPONENT: Okay.</p> <p>5 Q. (By Mr. Cain) You are muffled.</p> <p>6 A. I'm trying to write while I'm talk- --</p> <p>7 take notes while I'm --</p> <p>8 Q. Okay. So I guess to summarize, you don't</p> <p>9 have access to any information right now that</p> <p>10 would -- that would put us or anyone in touch with ,</p> <p>11 true?</p> <p>12 A. True.</p> <p>13 Q. You've identified for us some members that</p> <p>14 were on the call. We've already discussed that. You have</p> <p>15 said that the purpose for being on this call was to</p> <p>16 uncover antifa journalists, fair? Is that a fair</p> <p>17 statement?</p> <p>18 A. Yes.</p> <p>19 Q. All right. And as a result of the call,</p> <p>20 you uncovered as an antifa journalist, right?</p> <p>21 A. I did not 100 percent confirm that, but</p> <p>22 that was my -- in my notes. That was my -- that was my</p> <p>23 recollection. That was my opinion of who was on the</p> <p>24 call, yes.</p> <p>25 Q. All right. And you mentioned two others,</p> <p style="text-align: right;">Page 66</p>	<p>1 than one call, right?</p> <p>2 A. Well, I said that I've infiltrated other</p> <p>3 communications, yes.</p> <p>4 Q. Okay. What do you mean by that?</p> <p>5 A. I mean, I've been involved in -- and I</p> <p>6 didn't say that I had, but we had. We had infiltrated</p> <p>7 other things, other meetings, other communication, other</p> <p>8 protests.</p> <p>9 Q. Okay. And you're using the royal "we."</p> <p>10 Who are you referring to when you say "we had"?</p> <p>11 A. Other people that were involved in or</p> <p>12 associated with FEC or knew ADF.</p> <p>13 Q. Okay. Can you -- is there a point person</p> <p>14 or a core group of people that you can identify that were</p> <p>15 involved in this? By name.</p> <p>16 A. I don't understand. So there's lots of</p> <p>17 research being done on antifa.</p> <p>18 Q. Okay. All right. Well, let me backtrack a</p> <p>19 second.</p> <p>20 Other than the call that we've described</p> <p>21 where you -- obviously you didn't identify yourself on</p> <p>22 this Zoom call in question, right?</p> <p>23 A. I did not.</p> <p>24 Q. My question earlier was geared towards</p> <p>25 that, other calls that you were able to get on through a</p> <p style="text-align: right;">Page 68</p>
<p>1 and . Were either of those</p> <p>2 individuals on the call, if you know?</p> <p>3 A. No. They talked about them as being</p> <p>4 friendlies.</p> <p>5 Q. Okay.</p> <p>6 A. They didn't actually talk about</p> <p>7 . They talked about another individual related to</p> <p>8 that --</p> <p>9 THE REPORTER: I'm sorry, sir. I can't</p> <p>10 understand you still. Can you get closer -- I don't</p> <p>11 know. Can we go off the record a minute?</p> <p>12 MR. CAIN: Sure.</p> <p>13 THE VIDEOGRAPHER: Going off the record.</p> <p>14 The time is 11:47.</p> <p>15 (Discussion off the record.)</p> <p>16 (Recess from 11:47 a.m. to 11:50 a.m.)</p> <p>17 THE VIDEOGRAPHER: We're back on the</p> <p>18 record. The time is 11:50.</p> <p>19 Q. (By Mr. Cain) Okay. This , was this --</p> <p>20 the call -- the antifa call that we've been discussing,</p> <p>21 was that the first antifa call that he arranged for you to</p> <p>22 be on?</p> <p>23 A. Yeah. No. Well, actually, yes, yes.</p> <p>24 Q. Because you've indicated in the past that</p> <p>25 you've -- you were on more than one. You infiltrated more</p> <p style="text-align: right;">Page 67</p>	<p>1 conduit such as . Was this the only one?</p> <p>2 A. No. The only call that I was on related</p> <p>3 to this was this call. The previous time that I had a</p> <p>4 scheduling conflict, I could not get on the previous</p> <p>5 call. So this was the call that I could actually be on</p> <p>6 at my -- you know, at my office.</p> <p>7 Q. Okay. And that's -- that was the point.</p> <p>8 So as far as this -- this scenario where</p> <p>9 someone gets you on a call that you can monitor</p> <p>10 anonymously, this is the only one that you can testify to</p> <p>11 as having been on under these circumstances?</p> <p>12 MS. HALL: Objection. Relevance.</p> <p>13 A. I -- can you repeat the question?</p> <p>14 Q. (By Mr. Cain) Yeah. I'm just trying</p> <p>15 to -- you said in the past that you had infiltrated antifa</p> <p>16 calls. I'm trying to find out how many other calls you</p> <p>17 were on such as this one.</p> <p>18 MS. HALL: Charlie -- I'm trying to -- I'm</p> <p>19 trying to figure out why this is relevant to limited</p> <p>20 discovery. We're here for one specific call that dealt</p> <p>21 with your client, not other calls.</p> <p>22 THE DEPONENT: Is that an objection?</p> <p>23 MR. CAIN: No. It's a speaking objection,</p> <p>24 and it's waived.</p> <p>25 He's testified to this and provided</p> <p style="text-align: right;">Page 69</p>

<p>1 information on this, and I want to get an answer to my 2 question.</p> <p>3 Q. (By Mr. Cain) Are there other calls or was 4 this --</p> <p>5 MS. HALL: Again, it's not relevant.</p> <p>6 MR. CAIN: I don't -- either make an 7 instruction, but quit interrupting my questions, please.</p> <p>8 MS. HALL: I did. I'm objecting.</p> <p>9 Q. (By Mr. Cain) So --</p> <p>10 MR. CAIN: Okay. Make your objection and 11 then I will ask the question. He'll answer it unless you 12 make an instruction.</p> <p>13 Q. (By Mr. Cain) Let's just focus on . Was 14 this the only call that this particular conduit got you 15 on?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Were there other similar calls 18 relating to uncovering antifa members besides the one in 19 question that you were on?</p> <p>20 MS. HALL: Objection.</p> <p>21 A. Any type of communication or ways that 22 antifa communicated that we were able to get on or be at, 23 whether it be a meeting or otherwise, we did so legally.</p> <p>24 Q. (By Mr. Cain) I don't -- I don't -- I'm 25 not asking about legality at this point. I'm just asking:</p> <p style="text-align: right;">Page 70</p>	<p>1 A. Because it wasn't on my calendar. And the 2 only thing that I can do is get within a few days of the 3 September 26th screenshot, which is when I did the 4 information search related to Eric Dominion, Denver, 5 Colorado.</p> <p>6 Q. Right. Because we have a screenshot of you 7 doing that on September 26th, right?</p> <p>8 A. Yes.</p> <p>9 Q. So the call obviously would have occurred 10 prior to that, based on your prior testimony, correct?</p> <p>11 A. It would have, yes.</p> <p>12 Q. And so your best recollection, I guess, 13 would have been that the call would have been within a few 14 days of September 26th prior to that?</p> <p>15 A. That's me guessing. Yes.</p> <p>16 Q. Well, that's the most likely scenario, is 17 it not, based on your recollection?</p> <p>18 A. It's been a year, so I don't know.</p> <p>19 Q. And you -- do you keep a calendar?</p> <p>20 A. I do.</p> <p>21 Q. Is it an electronic calendar or a 22 handwritten one, old-fashioned?</p> <p>23 A. Sometimes a little bit of both.</p> <p>24 Q. Okay. What were you doing -- what do you 25 remember doing on the date that this call occurred?</p> <p style="text-align: right;">Page 72</p>
<p>1 Is there any other calls such as the one that you've been 2 describing that you were on. Either yes or no. I'm not 3 asking about whether it was legal.</p> <p>4 MS. HALL: Objection.</p> <p>5 A. That I was on?</p> <p>6 Q. (By Mr. Cain) Yes, that you were on.</p> <p>7 A. Okay. That I was on, no.</p> <p>8 Q. Okay.</p> <p>9 A. Personally.</p> <p>10 Q. Now, going back to the antifa call, I have 11 seen various dates -- or a range of dates that this call 12 was alleged to occur. What specific date did this Zoom 13 call occur?</p> <p>14 A. It happened between the mid and end of 15 September.</p> <p>16 Q. Right. And so my question was, 17 specifically. We have notes from the call that are not 18 dated, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And you've said in your affidavit that it 21 was on or about the week of September 27th of 2020. And 22 then you've said in testimony -- including just now -- mid 23 to late.</p> <p>24 Why can you not provide us the actual date 25 that the call occurred?</p> <p style="text-align: right;">Page 71</p>	<p>1 A. I don't. I mean, I can't go back that far 2 and give you that information. I mean, I can check my 3 calendar to see what I was doing on those dates, but 4 that's as close I can get.</p> <p>5 Q. Well, have you tried to go back -- I mean, 6 has anybody asked you to triangulate the actual date? I 7 don't want to ask you about your lawyers. But has anybody 8 asked you to do that? Any of the other defendants, to try 9 to get an actual date?</p> <p>10 A. No. My lawyer has asked me those 11 questions, yes, and I've gone back and done as much 12 research as I possibly can. There's a lot of moving 13 parts happening at the same time. I also ran a company 14 at the same time I was involved in building up FEC 15 United, and the same time that I was advocating for 16 people's rights in this community related to faith, 17 education, and small businesses.</p> <p>18 THE REPORTER: I'm sorry. And small 19 businesses?</p> <p>20 THE DEPONENT: Yes. Yes, ma'am. Small 21 businesses.</p> <p>22 Q. (By Mr. Cain) All right. So as you sit 23 here today, your testimony is it would have been -- within 24 a few days is your best estimate that the antifa call 25 occurred; is that fair?</p> <p style="text-align: right;">Page 73</p>

<p>1 MS. HALL: Objection.</p> <p>2 A. I'd rather not speculate, which is why I</p> <p>3 said from the middle to end of September. I know it</p> <p>4 happened before the 26th of September.</p> <p>5 Q. (By Mr. Cain) And you can't -- despite</p> <p>6 efforts in looking at your calendar, you can't recreate</p> <p>7 your schedule in order to get us a specific date, true?</p> <p>8 A. I've attempted to.</p> <p>9 Q. The book that has your notes in it --</p> <p>10 A. Yes.</p> <p>11 Q. -- do you still have that book?</p> <p>12 A. I do.</p> <p>13 Q. Does it have other notes besides the notes</p> <p>14 relating to the antifa call?</p> <p>15 A. It does.</p> <p>16 Q. In other words, subsequent to these notes,</p> <p>17 are you able to look at any material that would help you</p> <p>18 nail down the date in question?</p> <p>19 A. No. My schedule is pretty tight. I'm</p> <p>20 fairly busy on a daily business. It's one of the key</p> <p>21 complaints that my attorneys have in me getting back to</p> <p>22 them promptly.</p> <p>23 Q. Okay. Back to the Zoom call. Was there</p> <p>24 any video associated with this particular call?</p> <p>25 A. We were not in a video set, no. We</p> <p style="text-align: right;">Page 74</p>	<p>1 Q. All right. Anything else that you can</p> <p>2 recall?</p> <p>3 A. Not that I can recall.</p> <p>4 Q. There's other names on your notes that we</p> <p>5 didn't discuss on the first page, on Bates 205. I think</p> <p>6 we've -- we've discussed everybody but .</p> <p>7 was not on this call, I take it,</p> <p>8 right?</p> <p>9 A. I do not believe so.</p> <p>10 Q. Was part of the discussion on this call</p> <p>11 about ?</p> <p>12 A. Yes. At that point I had never met</p> <p>13 , and I really didn't know who he was.</p> <p>14 Q. Okay. Can you -- is it fair to say that</p> <p>15 was one of the -- one of the primary topics of</p> <p>16 this call?</p> <p>17 A. No.</p> <p>18 Q. All right. And how much time was spent</p> <p>19 discussing while you were on the call?</p> <p>20 A. A few minutes probably.</p> <p>21 Q. Do you remember what was said about him?</p> <p>22 A. Yeah, that he's a rat. They had a lot of</p> <p>23 choice things to say about him.</p> <p>24 Q. Okay. A rat meaning -- meaning what? What</p> <p>25 did you understand that to be referring to?</p> <p style="text-align: right;">Page 76</p>
<p>1 weren't video'ing the call.</p> <p>2 Q. Right. I understand you weren't on video.</p> <p>3 But were other people on the call on video?</p> <p>4 A. No.</p> <p>5 Q. And the person , was he with you during</p> <p>6 the course of this call?</p> <p>7 A. For part of it.</p> <p>8 Q. Okay. Explain which part he was with you.</p> <p>9 Just to get you on the call?</p> <p>10 A. No. He was here for part of the call.</p> <p>11 Q. Okay. So you two were there in your office</p> <p>12 and you started the call, and then he left?</p> <p>13 A. I think he came in and out, yes.</p> <p>14 Q. In and out.</p> <p>15 Did he hear -- was he there during the time</p> <p>16 that this conversation about Eric from Dominion occurred?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. And since he was associated with antifa, as</p> <p>19 you understood it before, did he identify for you anyone</p> <p>20 else that was on the call from his -- from his own</p> <p>21 knowledge?</p> <p>22 A. I believe he gave me some context behind</p> <p>23 this guy or guy.</p> <p>24 Q. So you think he knew him?</p> <p>25 A. I do, yeah.</p> <p style="text-align: right;">Page 75</p>	<p>1 A. They were not talking about him in</p> <p>2 endearing terms.</p> <p>3 Q. And then you also have listed -- I don't</p> <p>4 think we got to them -- you put rat in your notes, I do</p> <p>5 believe.</p> <p>6 A. Yeah.</p> <p>7 Q. Help contact this . So is that your</p> <p>8 note to yourself to say you need to get in touch with him</p> <p>9 as a result of what was said about him?</p> <p>10 A. Yes.</p> <p>11 Q. I mean, the idea of being an enemy of</p> <p>12 antifa as a potential friend or alley for you?</p> <p>13 A. It was just another point of data.</p> <p>14 Q. Then you say under that note about ,</p> <p>15 , hyphen, question mark. This guy is antifa, two</p> <p>16 question marks.</p> <p>17 What is the -- why did you write that down?</p> <p>18 A. They were talking about . And</p> <p>19 that -- it came up because of connection between the -- I</p> <p>20 think it was PSL and antifa. I think that that's the</p> <p>21 socialist movement on DSL. I think it's DSL.</p> <p>22 Q. Okay. Well, what was the discussion about</p> <p>23 ?</p> <p>24 A. was, I guess, involved in</p> <p>25 organizing protests and was standing up. And I don't</p> <p style="text-align: right;">Page 77</p>

<p>1 remember the context behind it. It was just the context 2 of them bringing in someone that is a school board member 3 into the conversation. 4 Q. Did tell you who actually organized this 5 Zoom call? 6 A. No. 7 Q. And you don't know? 8 A. No, no. But nobody questioned -- well, it 9 doesn't matter. 10 Q. Nobody questioned what? 11 A. Nobody questioned him being on the call. 12 Q. Oh, . Okay. 13 Do you know whether was a part 14 of this call at any point? 15 A. I can't say for certain, no. 16 Q. Were you on the call when it began? 17 A. No. 18 Q. Were you on the call when it ended? 19 A. No. 20 Q. So you don't know how long the call was in 21 total? 22 A. I can speculate. But, no, I don't. 23 Q. How -- approximately how long were you on? 24 A. 40 minutes, I believe is what I recall, 25 45 minutes. Maybe a little less, a little more.</p> <p style="text-align: right;">Page 78</p>	<p>1 note was, Who is this woman? That's referring to 2 . When you got off, your last note was , 3 , media, question mark. Hit this guy. 4 Is that a reference to contacting him? 5 A. No. I think it was a reference to them 6 wanting to go after this guy. 7 Q. Okay. 8 A. Somebody referred to him as and 9 somebody referred to him as . And at that 10 point, I didn't know who was. 11 Q. But you do now? 12 A. I do. 13 Q. Actually, while I'm thinking about it, 14 let's -- I just received this -- I'm going to see if I can 15 share my screen with you because this is not -- it's 16 probably something that you have in front of you. 17 This is Plaintiff's Exhibit 131. This was 18 posted, I think yesterday, on GAB by . And it's 19 a two-page document. 20 Did you see this posting, Mr. Oltmann? 21 MS. HALL: Charlie, we don't see anything 22 on the screen. 23 THE DEPONENT: I see nothing on the 24 screen. 25 MR. CAIN: Well, let's see.</p> <p style="text-align: right;">Page 80</p>
<p>1 Q. You -- you say in your notes, quote, Four 2 to five, close quote, training. 3 A. What page are you on? 4 Q. And then -- I'm sorry? 5 A. What page is that on? I'm sorry. 6 Q. Bates 208 at the top. I've actually 7 bookmarked that for a second. 8 These notes are not in order, are they? 9 Like in the order you wrote them. 10 A. Based on what I'm looking at, no, they're 11 not. 12 Q. Okay. In fact, what is the first page of 13 the note? Antif- -- is it -- is it 206 where you say 14 antifa call - ? 15 A. Yes. 16 Q. Okay. So 206 is page 1? 17 A. Yes. 18 Q. What is page 2? 19 A. Page 2 is "fortify training." 20 Q. So that's -- 21 A. The next one is 208. 22 Q. 208 is page 2. 23 A. Then page 3 is, Contact this . And 24 then page 4 is, Who is. 25 Q. Okay. So then when you got on your first</p> <p style="text-align: right;">Page 79</p>	<p>1 MR. BURNS: For what it's worth, Charlie, 2 I was able to see it. 3 THE REPORTER: Who just said that? 4 MR. BURNS: John Burns. 5 THE DEPONENT: I think you've made me the 6 spotlight, so everyone else can see it, but I can't see 7 it. So hold on a second. No. Well, I can't see it. 8 MR. CAIN: Let's do this. I don't want to 9 waste time on this. Let's go off the record for a 10 minute. 11 THE VIDEOGRAPHER: Going off the record. 12 The time is 12:09. 13 (Recess from 12:09 p.m. to 12:17 p.m.) 14 THE VIDEOGRAPHER: Okay. We're back on 15 the record. The time is 12:17. 16 Q. (By Mr. Cain) All right. Mr. Oltmann, 17 before the technical issues, we were talking about 18 that is referenced in your notes. And then I had 19 marked Exhibit 131, tried to share my screen, and 20 that -- I understand you have it actually in front of you; 21 is that true? 22 A. I do. 23 MR. CAIN: And for the record, Exhibit 131 24 was posted on GAB. It hasn't been produced by any 25 parties. We were made aware of it last night. And it</p> <p style="text-align: right;">Page 81</p>

<p>1 purports to be a posting from at</p> <p>2 .</p> <p>3 Q. (By Mr. Cain) Do you recognize -- well,</p> <p>4 let me ask it a little different way. Do you follow</p> <p>5 on GAB?</p> <p>6 A. No.</p> <p>7 Q. Have you ever seen this posting before now?</p> <p>8 A. I have not.</p> <p>9 Q. Are you in communication with ?</p> <p>10 A. From time to time, yes.</p> <p>11 Q. All right. Well, this may be helpful or it</p> <p>12 may not be since you hadn't seen it, but he makes some</p> <p>13 statements that I wanted to ask you about.</p> <p>14 At the beginning of this document, he says,</p> <p>15 When my team preserved material from Eric Coomer, we did</p> <p>16 so because of his connection to antifa, not because of his</p> <p>17 connection to Dominion, which we didn't even know existed</p> <p>18 before --</p> <p>19 Do you know what he's referring to --</p> <p>20 MS. HALL: Objection.</p> <p>21 Q. (By Mr. Cain) -- with that comment?</p> <p>22 MS. HALL: I apologize, Charlie.</p> <p>23 Objection. Calls for speculation.</p> <p>24 A. No.</p> <p>25 Q. (By Mr. Cain) In other words, have you</p> <p style="text-align: right;">Page 82</p>	<p>1 Q. Have you spoken to about what</p> <p>2 occurred on this call?</p> <p>3 A. No.</p> <p>4 Q. So you don't have any idea where he's</p> <p>5 getting this particular information from; is that fair?</p> <p>6 MS. HALL: Objection. He can only answer</p> <p>7 that question if it does not relate to attorney-client</p> <p>8 privilege.</p> <p>9 Q. (By Mr. Cain) And that's fine. If this --</p> <p>10 A. On this --</p> <p>11 Q. No, no, I don't -- not -- not if it's just</p> <p>12 repeating something your lawyer said. I'm interested in</p> <p>13 your testimony, not theirs.</p> <p>14 A. Okay. Can you repeat the question?</p> <p>15 Q. Probably not.</p> <p>16 MR. CAIN: Laurel?</p> <p>17 (The last question was read.)</p> <p>18 A. Correct.</p> <p>19 Q. (By Mr. Cain) And was or</p> <p>20 anyone -- any team members, as he calls them -- did they</p> <p>21 provide you with Dr. Coomer's Facebook pages?</p> <p>22 A. No.</p> <p>23 Q. The screenshot of the pages?</p> <p>24 A. No.</p> <p>25 Q. Because you -- let me actually back up for</p> <p style="text-align: right;">Page 84</p>
<p>1 received material regarding Eric Coomer from or</p> <p>2 his team?</p> <p>3 A. I don't believe so, no. I have gotten</p> <p>4 emails from , but that's about it.</p> <p>5 Q. Do any of those relate to Dr. Coomer?</p> <p>6 A. I do not believe so. If they did, they</p> <p>7 would be in the discovery request.</p> <p>8 Q. Then on the bottom of -- well, actually,</p> <p>9 let me ask you one other thing.</p> <p>10 In this posting, in the middle of the</p> <p>11 posting, there's a paragraph that says, During the phone</p> <p>12 call with Eric Coomer on the line with other known members</p> <p>13 of antifa nationwide, one of the antifa members spoke</p> <p>14 about finding and killing me. That was end of last year.</p> <p>15 Now, as far as you know, was not</p> <p>16 on the call that you have been describing, right?</p> <p>17 A. Not -- not that I'm --</p> <p>18 MS. HALL: Objection. He can only answer</p> <p>19 this question if it doesn't deal with attorney-client</p> <p>20 privilege.</p> <p>21 Q. (By Mr. Cain) Yeah, I'm not asking if your</p> <p>22 lawyers told you anything about this. It's just</p> <p>23 like -- my question was: As far as you know, was</p> <p>24 not on this call, correct?</p> <p>25 A. Correct.</p> <p style="text-align: right;">Page 83</p>	<p>1 a second.</p> <p>2 You provided -- I think it was counsel for</p> <p>3 Sidney Powell and Defending the Republic, you provided</p> <p>4 them with sworn testimony on or about August 18, I</p> <p>5 believe, of this year, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And part of -- and that's testimony that,</p> <p>8 as you sit here today, you were under oath, you swore that</p> <p>9 it was true, and that testimony is true and accurate,</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. I don't want -- I don't want to repeat or</p> <p>13 reinvent anything from it.</p> <p>14 But one of the things that you refer to is</p> <p>15 getting screenshots of Dr. Coomer's Facebook pages. And</p> <p>16 as I appreciate your testimony, those screenshots did not</p> <p>17 come from ; is that fair?</p> <p>18 A. That is fair.</p> <p>19 Q. All right. So who did -- who did you get</p> <p>20 the screenshots of the Facebook pages from?</p> <p>21 A. I got those screenshots from someone who</p> <p>22 had access to that legally.</p> <p>23 Q. Yeah. And you've said that.</p> <p>24 A. Can we take a quick break? I need to use</p> <p>25 the restroom. I just drank a bunch of water.</p> <p style="text-align: right;">Page 85</p>

<p>1 Q. Well, let me -- let me ask you a follow-up, 2 then we can take the break, it relates to the question 3 that I just asked you. 4 A. All right. I'll answer it. 5 Q. The -- the question was whose -- who gave 6 you -- this is along the lines of the other question about 7 the conduit, -- who is the person who gave you access 8 to the Facebook pages by giving you screenshots? 9 A. Someone that had legally -- legal access 10 to those screenshots. 11 Q. I'm asking you for the name. 12 A. I won't give you the name. I will not 13 answer that question. 14 Q. You've been ordered by the Court to answer 15 that question. 16 A. I understand. I also understand the 17 consequences that come from not answering that question. 18 Q. What's the basis for refusing to answer the 19 question? 20 A. Eric Coomer's lack of control, and his 21 ability to and desire to hurt those that speak out 22 against him. 23 Q. How has -- 24 A. There's -- let me -- let me actually 25 finish that. There's also another problem in that that</p> <p style="text-align: right;">Page 86</p>	<p>1 anything that would be politically motivated or biased. 2 That was, I think, paragraph 3. 3 So as far as Mr. Coomer is concerned, I 4 fabricated those. Now, you want me to come forward with 5 the person that gave me access to that information. Even 6 given the history of Mr. Coomer even as -- as recently as 7 a couple months ago where he got in a bar fight. 8 So, I mean, you want me to give you 9 information related to this individual to a person who 10 has a history of flying off the -- off the handle, and I 11 don't think that that is appropriate. So given that, I 12 understand the consequences. I understand we'll go back 13 in front of the Court. I will not divulge that 14 information unless I feel that that person is safeguarded 15 against Mr. Coomer specifically. 16 MS. HALL: Charlie, and I'm going to at 17 this point say we need to take a break and go off the 18 record. 19 MR. CAIN: I'm not agreeing to it. I 20 mean, you can do what you want, but I want to get to the 21 bottom of this. 22 MS. HALL: And I understand -- there's no 23 question posed, and he asked for a break about four 24 questions ago. So I'm asking for a break. 25 A. Just a quick break just to use the</p> <p style="text-align: right;">Page 88</p>
<p>1 person is not protected under any protection order. And 2 at the point that he would be protected under a 3 protection order, I would seek that that protection order 4 also prohibit Eric Coomer from having access to that 5 information as well. 6 Q. In the hearing, we stipulated that the 7 protective order would be covered by the Facebook conduit 8 as well. So they are protected, and that's our position 9 and stipulation. So -- 10 A. It is my position that that has not been 11 stipulated. It is also my position that having Eric 12 Coomer have access to this individual would be a danger 13 to this person, given Eric Coomer's history with antifa. 14 Q. Sir, you're -- I just want to make sure 15 that you understand what you're doing. The Court has 16 ordered you to provide that information to us. And -- and 17 you are aware that there's an order in place to that 18 effect, right? 19 A. I also understand that on -- 20 Q. But just answer that question first. Can 21 you answer that? 22 A. I'm answering that question for you right 23 now. On December 8th, Mr. Coomer said specifically that 24 those posts were fabricated. He furthermore said that he 25 had no -- never had any sort of desire to push out</p> <p style="text-align: right;">Page 87</p>	<p>1 restroom, and I'll be right back. 2 Q. (By Mr. Cain) You're going to do it no 3 matter what. I'm just saying I'm in the middle of a 4 topic, and so I'm not -- it's not an agreed-upon break. 5 MS. HALL: Okay. Break. We'll come back 6 in a few minutes. Thank you. 7 THE DEPONENT: I'm just going to use the 8 restroom. I'll be right back. 9 THE VIDEOGRAPHER: Going off the record. 10 The time is 12:26 p.m. 11 (Recess from 12:26 p.m. to 12:34 p.m.) 12 THE VIDEOGRAPHER: We're back on the 13 record. This is the beginning of Media Number 2. The 14 time is 12:34. 15 Q. (By Mr. Cain) Okay. Mr. Oltmann, before 16 the break, I was asking you about the access to the 17 Facebook pages. It wasn't an agreed break. I don't want 18 to know if you -- the substance of your conversations, but 19 did you confer with counsel during the last break? 20 MS. HALL: Objection. 21 A. I didn't, no. I went to the bathroom like 22 I told you I was going to. 23 Q. (By Mr. Cain) So you didn't confer with 24 counsel? 25 A. I did not.</p> <p style="text-align: right;">Page 89</p>

<p>1 Q. Having had time to visit the restroom, I'm 2 going to give you one more shot. Are you going to respond 3 to my question as to who the person was that gave you 4 access to Dr. Coomer's Facebook pages? 5 A. No. Put it in the protective order, and I 6 feel that that person is protected, then I may be 7 compelled to release that information. But given, again, 8 the irrational nature of Mr. Coomer, I'm not -- I'm not 9 prepared to do that right now. 10 Q. All right. Well, I'll bite on -- and I 11 don't agree with you, I do believe it's protected. We've 12 already stipulated that it's protected and it's been 13 ordered. So -- 14 A. That doesn't stop -- that doesn't stop 15 Eric Coomer from being on this call right now and for him 16 getting access to that information. 17 Q. Right. 18 And you're speculating, though, as to what 19 anyone would do with that information. 20 A. I'm not speculating. I'm using -- I'm 21 using the habits and behavior of Mr. Coomer himself in 22 order to dictate what I think he will do in the future. 23 Q. Okay. I'm going to burn a minute on this 24 because we're going to have to address this with the 25 Court.</p> <p style="text-align: right;">Page 90</p>	<p>1 Q. You mentioned, I think in the past, maybe 2 it was on one of your shows, that Dr. Coomer you said 3 assaulted two individuals. Is that -- is that what you're 4 referring to? 5 A. That is the information that was provided 6 to me, yes. 7 Q. Okay. So do you know whether or not 8 Dr. Coomer was charged with assault in this alleged bar 9 fight? 10 A. I do not believe he was. 11 Q. Right. 12 And, in fact, do you know whether the other 13 individuals involved in this incident were charged 14 criminally? 15 A. I do not know that as well. 16 Q. You don't have any firsthand knowledge of 17 anything related to a bar fight in Salida, do you? 18 A. I hired a private investigator through 19 counsel. 20 Q. Right. 21 Is Dr. Coomer under surveillance right now? 22 MS. HALL: Objection. 23 A. No. 24 Q. (By Mr. Cain) Has he been in the past? 25 MS. HALL: Objection.</p> <p style="text-align: right;">Page 92</p>
<p>1 You said because of Dr. Coomer's lack of 2 control, you mentioned a bar fight. What specifically are 3 you saying presents a danger to the Facebook page person 4 by Dr. Coomer? 5 A. His -- his own writings that date back all 6 the way back to 1996. His involvement with the 7 skinheads. His previous addiction to heroin. His 8 multiple arrests for DUI. His inability to control 9 himself, comments and things that he's done in the past. 10 I mean, he's just a wrecking ball. 11 Writing stuff publicly about how he abused his wife at 12 the time. I didn't write these things, he did. And 13 those aren't the writings of someone who is a sane 14 individual. So I used his own writings and the things 15 that he wrote in order to come to a conclusion on what 16 he's likely to do to someone else based on his 17 recklessness with his own life. 18 Q. This -- this individual, as you understand 19 it -- but you also mentioned a bar fight. What does that 20 have to do with this? 21 A. I mean, you have a bar fight in the middle 22 of all of this. I mean, I don't know. I -- I don't -- 23 Q. Who told you he had a bar fight? 24 A. Someone in the -- someone in the Salida 25 area.</p> <p style="text-align: right;">Page 91</p>	<p>1 A. I don't know what my attorneys have done 2 in order to garner information about Mr. Coomer. 3 Q. (By Mr. Cain) I'm not asking you about 4 your attorneys. I'm talking specifically about whether 5 you have him under surveillance. 6 A. I personally do not have him under 7 surveillance, no. 8 Q. Have you ever sent someone to Dr. Coomer's 9 house to surveil him? 10 A. No. Somebody volunteered to go by his 11 home to see if he was there because I was asked by 12 someone else if I'd seen Eric Coomer. Lots of people 13 reached out to me all over, giving me information about 14 Mr. Coomer. 15 Q. Can you see my screen? 16 A. I cannot. You have to hit the share 17 screen button at the bottom. 18 Q. I'm screen sharing. In the exhibits, it's 19 Exhibit 104. You can't see it, I guess, because of your 20 setup, but it's on the screen. 21 A. Hold on. Let me go to Exhibit 104. 22 Q. It was produced by Mr. Hoft. 23 A. Okay. 24 Q. It comes from the phone number 25 303-667-5105. Is that your phone number?</p> <p style="text-align: right;">Page 93</p>

<p>1 A. It is.</p> <p>2 Q. Is that your text to him, I sent someone to</p> <p>3 his house and no sign of him?</p> <p>4 A. I don't have that text in any of my texts.</p> <p>5 And I don't understand the context of this.</p> <p>6 Q. I asked you, Have you sent people to his</p> <p>7 house to surveil him? You said, No, that you had</p> <p>8 volunteers.</p> <p>9 Did you send this text and did you send</p> <p>10 someone to Dr. Coomer's house in November of 2020?</p> <p>11 A. I did not send someone to his house. I</p> <p>12 sent someone to see if he was there. Because they called</p> <p>13 me and said, I'm here. I can check and see if he's at</p> <p>14 his house.</p> <p>15 Q. Okay. Who did you send to his house?</p> <p>16 A. It was a guy that lives in Salida that</p> <p>17 reached out to me via Signal and said I live in Salida.</p> <p>18 There's a lot of really bad people that live here. Those</p> <p>19 are his exact words. How can I help?</p> <p>20 Q. Okay. And my question is: Just like all</p> <p>21 these other questions that you're not answering, who is</p> <p>22 this person?</p> <p>23 A. I've answered every single one of your</p> <p>24 questions.</p> <p>25 Q. Who is the individual that you sent to</p> <p style="text-align: right;">Page 94</p>	<p>1 someone to his house and no sign of him.</p> <p>2 MS. HALL: Charlie, you have cherry-picked</p> <p>3 one sentence. This thread shows that there's 14 text</p> <p>4 messages.</p> <p>5 A. Where are the rest?</p> <p>6 Q. (By Mr. Cain) I'm not going to ask about</p> <p>7 the rest. I have limited time. I want to know the answer</p> <p>8 to my question. Did you send this text or not?</p> <p>9 A. Well, I can't see the context of this</p> <p>10 text. I don't have this text in my possession, because</p> <p>11 when my phone was replaced, that did not go with it. So</p> <p>12 if you can show me the rest of the text, I can tell you</p> <p>13 whether or not I sent it in the context of --</p> <p>14 Q. This is what I have. You can go back and I</p> <p>15 guess talk to Mr. Hoft and review the records with your</p> <p>16 counsel.</p> <p>17 My question is: Did you send the text? As</p> <p>18 you sit here, do you know or not?</p> <p>19 A. I don't know. I mean, I'll assume that I</p> <p>20 did if it came from Mr. Hoft, but I don't know. I don't</p> <p>21 have this text in my possession.</p> <p>22 Q. You talked about Dr. Coomer lacking control</p> <p>23 and that's why you're not telling me the Facebook conduit.</p> <p>24 I'm going to show you what's been marked</p> <p>25 previously as Exhibit 46. This is a Parlor post. You --</p> <p style="text-align: right;">Page 96</p>
<p>1 Dr. Coomer's house? What's his name or her?</p> <p>2 MS. HALL: Objection.</p> <p>3 Q. (By Mr. Cain) Who?</p> <p>4 A. His name is Dave.</p> <p>5 Q. Last name?</p> <p>6 A. I actually don't have his last name.</p> <p>7 Q. Oh. Convenient.</p> <p>8 MS. HALL: Charlie, we don't need the side</p> <p>9 comments.</p> <p>10 Q. (By Mr. Cain) All right. Dave in Salida,</p> <p>11 you sent to Dr. Coomer's house in November, or at least he</p> <p>12 volunteered to do it, right?</p> <p>13 A. He actually said that he would go by</p> <p>14 there.</p> <p>15 Q. Is this the same person who provided you</p> <p>16 information about some so-called bar fight?</p> <p>17 A. No. It was a private investigator that</p> <p>18 got that information.</p> <p>19 Q. So did you send this text or not on</p> <p>20 Exhibit 104?</p> <p>21 A. I'd have to see the text in order to see</p> <p>22 that, if I did or didn't.</p> <p>23 Q. The text is Exhibit 104, sir. It's in the</p> <p>24 Exhibit Share. It's a one-liner. It has your phone</p> <p>25 number on it, you testified to, and is says, I sent</p> <p style="text-align: right;">Page 95</p>	<p>1 I'm sharing my screen, but you can't see it, so I guess</p> <p>2 this is for the benefit of everyone else.</p> <p>3 Do you have that up?</p> <p>4 A. Yeah. What day was this?</p> <p>5 Q. Does it matter?</p> <p>6 A. Yeah.</p> <p>7 Q. I don't know. You sent it, didn't you?</p> <p>8 A. I did not send that. That was what's</p> <p>9 called an echo.</p> <p>10 Q. Okay. Tell me what that is.</p> <p>11 A. An echo is where you share somebody else's</p> <p>12 post, and you can add your own thing to it.</p> <p>13 Q. Okay.</p> <p>14 A. But I do --</p> <p>15 Q. I'm sorry. Go ahead.</p> <p>16 A. I do believe that when your family gets</p> <p>17 threatened, when you have to surround your bed with metal</p> <p>18 plates because you're afraid someone is going to come</p> <p>19 kill your family, and you have to higher personal</p> <p>20 security detail when people send you powder in the mail,</p> <p>21 when people come to your house with a gun, those are all</p> <p>22 things -- by the way, I didn't attack Dominion. I went</p> <p>23 after the credibility of Eric Coomer and his connection</p> <p>24 to the election fraud based on his own words. Right?</p> <p>25 So that happened within a couple of days</p> <p style="text-align: right;">Page 97</p>

<p>1 of -- of me actually coming out that Monday. So I</p> <p>2 didn't -- you don't cut the tongue out of the person</p> <p>3 that's lying. You cut the tongue out of the person who's</p> <p>4 telling the truth.</p> <p>5 When you get attacked with such -- with</p> <p>6 such vitriol, you have a tendency to get really pissed</p> <p>7 off, especially when your kids and your wife are in</p> <p>8 danger. So, yeah, emotions fly high.</p> <p>9 So I don't know when this was written. My</p> <p>10 guess is that the top section was written</p> <p>11 somewhere -- somewhere after or before he put up a post</p> <p>12 related to the fact that those posts were manufactured.</p> <p>13 Q. Okay. You don't remember the con- -- the</p> <p>14 circumstances that caused to you put this post up?</p> <p>15 A. I'm sure it was anger.</p> <p>16 Q. Okay.</p> <p>17 A. I'm sure it was written out of anger.</p> <p>18 Q. You're not denying that this is your post,</p> <p>19 are you?</p> <p>20 A. Well, I don't -- I don't know because I</p> <p>21 don't have that post anywhere in any of the posts that I</p> <p>22 have on Parlor. It does not exist.</p> <p>23 Q. Okay. Well, we were able to get it from</p> <p>24 Parlor, obviously. Are you denying that you sent --</p> <p>25 A. Hold on a second. You got this from</p> <p style="text-align: right;">Page 98</p>	<p>1 house, isn't it, in Salida?</p> <p>2 A. I think so. I've never been there.</p> <p>3 Q. Okay. That was your understanding, though,</p> <p>4 when you echoed that picture?</p> <p>5 A. Sure. If I did it, yeah.</p> <p>6 I've never -- I've never seen this post.</p> <p>7 Q. Well, you typed it, didn't you?</p> <p>8 A. Again, I went back in Parlor and I don't</p> <p>9 have any access to any of those records. It's kind of</p> <p>10 like the stuff with YouTube. So you can tell me that I</p> <p>11 posted this, but I can't find it anywhere.</p> <p>12 Q. Well, do you remember doing it? Do you</p> <p>13 remember saying, So it's up to you, blow this shit up.</p> <p>14 Share. Put his name everywhere. No rest for this</p> <p>15 shitbag. Eric Coomer. Eric Coomer. Eric Coomer. This</p> <p>16 shitbag and the corrupt ass hats in Dominion voting</p> <p>17 systems must not steal our election and our country.</p> <p>18 Eric, we are watching you.</p> <p>19 You don't remember typing that?</p> <p>20 A. No. But it's possible that I did type it.</p> <p>21 Q. You did, didn't you?</p> <p>22 A. I just answered your question.</p> <p>23 Q. And you wanted people to go to his house.</p> <p>24 That's why you reposted -- or echoed that picture?</p> <p>25 A. You want to restate your question?</p> <p style="text-align: right;">Page 100</p>
<p>1 Parlor?</p> <p>2 Q. Yes.</p> <p>3 A. You said you got this from Parlor. You</p> <p>4 got this from Parlor. So Parlor gave you this post?</p> <p>5 Q. No. It was posted to your Parlor account.</p> <p>6 A. Well, I went to Parlor and asked them if I</p> <p>7 could get a record of my previous posts that did not show</p> <p>8 up, and they denied me.</p> <p>9 Q. Are you denying that you posted this, yes</p> <p>10 or no?</p> <p>11 A. I don't know if I posted it. To me,</p> <p>12 something like that would be an echo. It would not</p> <p>13 be -- an echo is where you basically repost somebody</p> <p>14 else's post.</p> <p>15 Q. Okay. So did you repost -- when you say,</p> <p>16 I've been busy doing 15 interviews in the last two days,</p> <p>17 are you saying someone else posted that and then you just</p> <p>18 reposted someone who had been doing 15 interviews in the</p> <p>19 last two days?</p> <p>20 A. No, no, no. You don't understand how</p> <p>21 Parlor works. So you'll repost the post, which is a</p> <p>22 picture, and then above it you just put your own -- your</p> <p>23 own stuff into it.</p> <p>24 Q. Okay. So the picture was posted, and you</p> <p>25 grabbed the -- the screenshot. This is of Dr. Coomer's</p> <p style="text-align: right;">Page 99</p>	<p>1 Q. Yeah. What do you mean by "blow this shit</p> <p>2 up"?</p> <p>3 A. I'm not even sure I wrote it.</p> <p>4 Q. So you're not standing by this?</p> <p>5 A. I can't find it anywhere at Parlor. You</p> <p>6 said you got it from Parlor, yet conveniently I can't go</p> <p>7 to Parlor and get any posts previously. Nor are you</p> <p>8 willing to give me the date that this was supposedly</p> <p>9 posted.</p> <p>10 Q. Did you delete this post?</p> <p>11 A. I did not. I've deleted nothing.</p> <p>12 Q. You're under oath, sir.</p> <p>13 A. Unlike your client. Unlike your client, I</p> <p>14 have deleted nothing.</p> <p>15 Q. Including the Facebook video that you took</p> <p>16 while you were in Grand Junction the other day that you</p> <p>17 deleted?</p> <p>18 A. What do you mean I deleted? I didn't</p> <p>19 delete it.</p> <p>20 Q. Yeah, you did. It was taken down.</p> <p>21 A. That's not true.</p> <p>22 Q. Who took it down?</p> <p>23 A. It was never taken down.</p> <p>24 Q. So that Facebook -- you're actually on</p> <p>25 record saying you had to delete it.</p> <p style="text-align: right;">Page 101</p>

<p>1 A. You cannot be this stupid. Maybe you are. 2 Maybe you don't use social media. But all's I have to 3 do, and all's Eric had to do on all of those posts that 4 he deleted was change the settings so that they were not 5 public, and that he was the only one that could have 6 access to them. So that's what I did. I preserve 7 everything. And you're the one that came out and said 8 that you preserved them as well. 9 Q. Oh. 10 A. So you want to have a debate about your 11 client, we can have a debate about your client. If you 12 want to ask me questions related to your client and 13 his -- and whether or not he was on that call, whether or 14 not he was a part of election fraud, you know, we can 15 just starting mounting up the evidence. I've been 16 through all your photos and exhibits. 17 So if you'd like to ask me questions about 18 those, I'm prepared to answer those. But this subjective 19 stuff that you want to throw in the middle of it and ask 20 me questions about things that either are not relevant or 21 not true, I'm not going to sit here and stand for it. 22 You can bully someone else. You're not going to bully 23 me. 24 Q. Are you through? 25 A. Are you?</p> <p style="text-align: right;">Page 102</p>	<p>1 will answer those questions. When you purposely lie to 2 me, as you have to the judge and in this case, which you 3 have done, then I'm going to correct that. 4 You said that I deleted those posts. Your 5 words, not mine. I did not delete those posts. I made 6 them private. There's a difference between making 7 something private and preserving those things and 8 deleting them. I did not delete them. 9 Q. (By Mr. Cain) You took them down. Then if 10 that's the issue that you have, then I stand corrected. 11 MS. HALL: Charlie, he did not take them 12 down. He just told you he made the post private. So 13 that means you and all of your team and all of your 14 experts and everything that you're doing to follow my 15 client 24 hours a day can no longer see that. It is 16 still on his Facebook page. If you are friends with Joe 17 Oltmann, you can go on his Facebook page -- 18 THE DEPONENT: No, you can't. No. 19 MS. HALL: -- and see it. 20 THE DEPONENT: No, but I'll show it to 21 him. 22 Q. (By Mr. Cain) All right. I'm going to 23 move on. I can -- I guess what I can conclude from this 24 is that it's possible that you posted an echo of a picture 25 of Dr. Coomer's house and you wrote these words, but you</p> <p style="text-align: right;">Page 104</p>
<p>1 Q. Nope. 2 A. Then let's go. 3 Q. So you said online that you took down the 4 video the other day from Grand Junction. 5 A. Yes. 6 Q. Okay. So where you're quibbling with me is 7 deleting it versus taking them down? 8 A. That's what you said. 9 MS. HALL: And, Charlie, how is this 10 relevant? What is this have to do with your client Eric 11 Coomer? Does the video have something to do with your 12 client? Because if not, please move on. 13 MR. CAIN: It's my time, Counsel. 14 MS. HALL: Then we'll sit here and you can 15 stare at my client, because the questions are not 16 relevant. You're going beyond the scope of limited 17 discovery. And you've done this with all of the 18 defendants, and I'm not cool with it anymore. 19 MR. CAIN: You've got intentional -- well, 20 first of all, I'm not going to debate you because it's a 21 waste of time. He testified that my client lacked 22 control. I've got an intentional infliction claim. And 23 your client is unwilling to own up to what he posted on 24 Parlor as Exhibit 46. 25 A. No. You're not asking me questions. I</p> <p style="text-align: right;">Page 103</p>	<p>1 won't confirm that for me? 2 A. There you go. There's my video. See, 3 this is Facebook. See that? That's the video you said I 4 took down. It's still up on Facebook. 5 Q. That's the video you said you took down. 6 A. I'm sorry? 7 Q. That's the video you said you took down. 8 A. No. Okay. Anyway -- 9 Q. You're -- you're starting -- well, I'm not 10 going to comment. 11 What we'll do is, I guess, move on to -- 12 A. It's a good idea. 13 Q. -- to another topic. 14 Actually, you know what? I'm going to take 15 a bathroom break. 16 MS. HALL: Oh, we object, Charlie. 17 THE DEPONENT: No, we don't. Stop it. 18 Stop. Please stop. Charlie, take a bathroom break. Do 19 you want a bathroom break, seriously? 20 MR. CAIN: Yeah. We're going to go off 21 the record because we've got limited amount of time and 22 we've wasted a lot of it. And I need to kind of organize 23 what I'm going to cover with you because I suspect your 24 lawyers are not going to agree to go past three hours 25 today.</p> <p style="text-align: right;">Page 105</p>

<p>1 THE DEPONENT: They may not agree but, I 2 mean, obviously, I -- 3 MS. HALL: Sure. 4 MR. CAIN: Let's go off the record. 5 THE VIDEOGRAPHER: Going off the record. 6 The time is 12:55. 7 (Recess from 12:55 p.m. to 1:02 p.m.) 8 THE VIDEOGRAPHER: We're back on the 9 error. The time is 1:02. 10 Q. (By Mr. Cain) Mr. Oltmann, since we have 11 45 minutes, I'll probably jump around a little bit. I 12 like to call it the lightening round. 13 But before I get off on some topics, I was 14 informed by one of our lawyers that the Parlor post was on 15 or about December 5th, which would have been before they 16 took the Parlor down and I think there was some loss of 17 data. 18 Does that help you in terms of your 19 recollection as to whether you posted that echo? 20 A. No, because once I saw this post, which 21 I've seen before, I went back to Parlor to try and 22 recover some of the information on Parlor to see if I had 23 posted that, in fact. And I could find no record of it, 24 not at Parlor. 25 But again, I guess that when the tech</p> <p style="text-align: right;">Page 106</p>	<p>1 Q. All right. So let's -- let's talk a little 2 bit about -- we talked about the antifa call, and your 3 conduit has been identified as _____, and that's essentially 4 it. We've talked about Facebook. I want to follow-up on 5 the Facebook question now. 6 You -- when you got this -- the original 7 screenshots from Dr. Coomer's Facebook account, were you 8 located at that elk hunt home that you had referred to in 9 some of your prior testimony? 10 A. Yes. 11 Q. Okay. So just help me a little bit about 12 the timeline. You had testified that you were -- you had 13 this epiphany when you were at this elk hunt. This would 14 have been November 6 of 2020; is that correct? 15 A. I never had an epiphany. 16 Q. Okay. Well, I don't mean to -- whatever it 17 was, on November 6th is when you started looking back at 18 Dr. Coomer as a result of an article that you read; is 19 that fair? 20 A. Correct. Correct. 21 Q. And that's why you were out elk hunting, I 22 think in New Mexico; is that right? 23 A. I was not elk hunting in New Mexico. 24 Q. Okay. What were you doing? 25 A. I was elk hunting.</p> <p style="text-align: right;">Page 108</p>
<p>1 giants decided that they were going to sensor half of 2 America, they in essence deleted history and part of that 3 is the stuff that was up on Parlor. 4 Q. All right. So did anybody else in December 5 of 2020, did anybody else have access to your Parlor 6 account besides yourself? 7 A. I'm not sure I understand the question. 8 Q. Well, someone posted this from your Parlor 9 account. The point of my question is: Did someone else 10 have access? Could someone else have posted this? 11 A. Well, I can't authenticate that post. I 12 mean, that post doesn't show that there's any comments. 13 That post doesn't show that there's any -- it doesn't 14 show anything. It doesn't look like what Parlor looks 15 like today, which is the reason why I went back to Parlor 16 to ask them if this is a post that they could recover for 17 me. 18 Q. And it's your sworn testimony that you 19 don't recall -- or you can't recall having actually made 20 that post? 21 A. No. But I've called Eric Coomer a shitbag 22 numerous times. 23 Q. Okay. So you stand by the content. It's 24 just you don't know if that's actually your post? 25 A. I stand by that comment.</p> <p style="text-align: right;">Page 107</p>	<p>1 Q. Okay. Where were you? 2 A. In Colorado. 3 Q. All right. And in terms of getting access 4 to the Facebook post, how did you go about actually 5 getting that data? 6 A. Somebody gave me access to it. 7 Q. Okay. And the somebody is the person 8 you're not going to reveal, correct? 9 A. I'm not going to reveal that person 10 because Eric Coomer is on this call, and the subject is 11 not subject, thus, I can see to the protection order by 12 giving you that information. 13 Q. Was it -- well, I'm not going to give you 14 too many names. Was it _____? 15 A. I -- I am not going to disclose who the 16 person is. 17 Q. Do you know _____? 18 A. I'm not going to disclose -- yes, I do. 19 Q. And you're not going to tell me whether it 20 was him that gave you access? 21 A. I'm not going to tell you -- I'm not going 22 to tell you who gave me access. 23 Q. Okay. Was November 6th the day that you 24 first received screenshots from the Facebook page? 25 November 6.</p> <p style="text-align: right;">Page 109</p>

<p>1 A. Yes.</p> <p>2 Q. Okay. And had you already been talking to</p> <p>3 one of Dr. Coomer's Facebook friends about getting access</p> <p>4 to his Facebook page prior to that point?</p> <p>5 A. No.</p> <p>6 Q. Did you know -- well, strike that.</p> <p>7 Had you had access to Dr. Coomer's Facebook</p> <p>8 account prior to November 6?</p> <p>9 A. No.</p> <p>10 Q. Walk me through the steps on November 6th</p> <p>11 that you took in order to get access.</p> <p>12 And I understand you're not going to tell</p> <p>13 me the names -- or name, but -- and I don't agree with</p> <p>14 that, obviously. But just kind of walk me through how you</p> <p>15 were able to do that.</p> <p>16 A. Okay. Repeat your -- is that a question</p> <p>17 or what --</p> <p>18 Q. Yes. Walk me through how you got access to</p> <p>19 the Facebook page.</p> <p>20 A. Somebody sent me the Facebook post.</p> <p>21 Q. I get that.</p> <p>22 You must have called someone. Tell me --</p> <p>23 tell me how it came about.</p> <p>24 A. I reached out to numerous people to see</p> <p>25 who'd be willing to give me information.</p> <p style="text-align: right;">Page 110</p>	<p>1 publicly available of people that were connected to those</p> <p>2 people, and looked to see if there was a 2 degree</p> <p>3 separation of Eric Coomer and other people that I could</p> <p>4 get access to that information.</p> <p>5 Q. And so you found through looking at -- or</p> <p>6 doing that research, someone that you recognized as a</p> <p>7 friend of Dr. Coomer?</p> <p>8 A. Not right away, no.</p> <p>9 Q. Well, you got the information on the 6th,</p> <p>10 right? You were able to get screenshots that day,</p> <p>11 correct?</p> <p>12 A. Yes. Some of them on that day, yes.</p> <p>13 Q. All right. And so how did you receive</p> <p>14 those? How were they transmitted to you?</p> <p>15 A. Signal. I believe Signal, yeah.</p> <p>16 Q. And same thing with -- well, were all of</p> <p>17 the Facebook pages sent to you via Signal?</p> <p>18 A. Again, the best I can recollect. I don't</p> <p>19 have access to my previous phone content.</p> <p>20 Q. Is the person who gave you the Facebook</p> <p>21 pages still a contact on your Signal account?</p> <p>22 A. I haven't looked at it, but probably.</p> <p>23 Q. Take a look real quick. I want to know.</p> <p>24 THE REPORTER: I'm sorry. I didn't</p> <p>25 understand.</p> <p style="text-align: right;">Page 112</p>
<p>1 Q. Okay. But specifically Facebook</p> <p>2 information. Why did you think Facebook might have</p> <p>3 information on Dr. Coomer?</p> <p>4 A. I didn't. I wanted to validate the</p> <p>5 information that I had previously.</p> <p>6 Q. So you just started calling or reaching</p> <p>7 out, as you said, to various people to see if they could</p> <p>8 get you access to his Facebook?</p> <p>9 A. I started doing research on the 6th to get</p> <p>10 access to information that would have corroborated the</p> <p>11 information that I had previously going back to</p> <p>12 September.</p> <p>13 Q. Okay. And then how did you -- did you find</p> <p>14 someone in your -- in your investigation who told you,</p> <p>15 Hey, I can get you access to the Facebook account?</p> <p>16 A. No. I just started doing research.</p> <p>17 Q. Okay. You're being evasive. I'm trying to</p> <p>18 get --</p> <p>19 A. Actually, that's exactly what I did. I</p> <p>20 started doing research. I started doing research on</p> <p>21 social media accounts. And was able to uncover Instagram</p> <p>22 account, Twitter account that had been previously</p> <p>23 deactivated. A Facebook account that was not</p> <p>24 deactivated.</p> <p>25 I started looking at pictures that were</p> <p style="text-align: right;">Page 111</p>	<p>1 THE DEPONENT: I just have to keep going</p> <p>2 backwards in time.</p> <p>3 Q. (By Mr. Cain) If you're not going to find</p> <p>4 it, I don't have time. Certainly don't stall the process.</p> <p>5 A. You asked me to look for it. I'm looking</p> <p>6 through every conversation that I've had.</p> <p>7 Q. All right. Well, then we'll go off the</p> <p>8 record and you can do it off the record.</p> <p>9 THE VIDEOGRAPHER: We're going off the</p> <p>10 record. The time is 1:12.</p> <p>11 (Recess from 1:12 p.m. to 1:13 p.m.)</p> <p>12 THE VIDEOGRAPHER: Back on the record.</p> <p>13 The time is 1:13.</p> <p>14 Q. (By Mr. Cain) All right. You indicated</p> <p>15 off the record, Mr. Oltmann, that through your search</p> <p>16 function, you're not able to pull up messages from the</p> <p>17 Facebook contact; is that true?</p> <p>18 A. That is true.</p> <p>19 Q. You'd have to individually go through that.</p> <p>20 And we don't have time for that, at least today we don't.</p> <p>21 You mentioned also that you had reached out</p> <p>22 to a number of people to do some invest- -- or in your</p> <p>23 investigation of Dr. Coomer on the 6th. Who else did you</p> <p>24 reach out to?</p> <p>25 A. Publicly available people that were -- you</p> <p style="text-align: right;">Page 113</p>

<p>1 know, the same thing. Just trying to figure out if 2 somebody would give me access to that information, that 3 would be friendly to the idea of validating who Eric 4 Coomer is.</p> <p>5 Q. Okay. And as you sit here today, are you 6 able to -- if you know, to pull up from Signal the 7 transmittal of the Facebook pages to you?</p> <p>8 A. I'm not sure I understand the question.</p> <p>9 Q. Well, is that -- is that transmittal data 10 still on your Signal app, if you know?</p> <p>11 A. Well, if it was on my Signal app, I would 12 have been able to find it, so, again, I believe that the 13 Signal when I downloaded the information did not carry 14 through -- carry over.</p> <p>15 Q. Did you ask that the information be sent 16 via Signal to you?</p> <p>17 A. I don't -- I don't recall, no.</p> <p>18 Q. Is there any way as you sit here to trace 19 the information of when and from whom you received the 20 Facebook pages?</p> <p>21 A. I'm not sure I understand the question.</p> <p>22 Q. Well, I'm just -- if I want to show the 23 Court, Here is evidence of when these Facebook pages were 24 transmitted to Joe Oltmann, as I sit here, I don't have 25 anything but your word.</p> <p style="text-align: right;">Page 114</p>	<p>1 (Phone ringing.)</p> <p>2 A. Apologies. Can you repeat that question?</p> <p>3 Q. (By Mr. Cain) Yeah.</p> <p>4 Did you have to convince this person to 5 provide you this information? In other words, were they 6 reluctant to do so?</p> <p>7 A. No.</p> <p>8 Q. And again, the reason you're not giving 9 this to me is because you think that their -- that the 10 reveal of their identity would subject them to some form 11 of retribution by Dr. Coomer?</p> <p>12 MS. HALL: Objection, Charlie. He has 13 told you 5 to 10 times already. He doesn't believe it's 14 in the protected order.</p> <p>15 MR. CAIN: I've already stipulated to 16 that. I'm --</p> <p>17 MS. HALL: I understand what you've said 18 on this deposition. There is nothing in the protective 19 order that was previously filed with the Court that 20 addresses what the Court just said the last time we were 21 there. So I get what your position is. You've heard 22 what my clients' is, and I guess we'll take it up with 23 the court.</p> <p>24 MR. CAIN: Oh. So let's assume for the 25 sake of argument that -- that that needs to be buttoned</p> <p style="text-align: right;">Page 116</p>
<p>1 So is there any physical evidence that you 2 can think of that would show that transmission?</p> <p>3 A. Yeah. I mean, I don't know. As I sit 4 here right now, no, but if I'm given more time to think 5 about it, I can probably come up with some sort of record 6 of where it came from.</p> <p>7 Q. But you're certain, as I understand your 8 testimony, that this person that gave you the screenshots 9 was one of Dr. Coomer's friends on his Facebook page at 10 the time?</p> <p>11 A. Yeah, I think still friends.</p> <p>12 Q. Did he or she -- is it a he or she, can you 13 at least tell me that?</p> <p>14 A. No.</p> <p>15 Q. Did he or she explain to you why they were 16 willing to provide you access to this information; what 17 their motivation was?</p> <p>18 A. Yeah. I don't -- I don't think they 19 probably had a motivation other than my explanation of 20 what I was dealing with. I mean, look it's a pretty 21 heavy conversation, right? It's not something to 22 be -- you know, to take lightly.</p> <p>23 Q. Did you have to convince this person the 24 reason for --</p> <p>25 THE DEPONENT: Sorry.</p> <p style="text-align: right;">Page 115</p>	<p>1 up. I don't believe that's the case. And I already told 2 you that our view is that it's subject to the protective 3 order.</p> <p>4 Q. (By Mr. Cain) But assuming that 5 information -- or that protective order was extended to 6 this information, would you be willing to provide us with 7 that testimony at that -- at that time?</p> <p>8 A. I think that I would give up more 9 information if I knew that Eric was not going to get 10 access to that information.</p> <p>11 Q. Okay. Would you provide us with the 12 identity of this person?</p> <p>13 A. If Eric did not have access --</p> <p>14 MS. HALL: Objection.</p> <p>15 Q. (By Mr. Cain) Is that a Yes?</p> <p>16 A. I can't speculate.</p> <p>17 Q. Okay. Let's -- let's talk a little bit 18 about your affidavit. We've spent almost all this 19 deposition talking about the antifa call and some of this 20 Facebook stuff.</p> <p>21 The affidavit which is Plaintiff's 22 Exhibit 2, I provided that to you previously, was signed 23 by you -- I believe on November 13 of 2020; is that 24 correct?</p> <p>25 A. Yes. Is that -- Exhibit 2?</p> <p style="text-align: right;">Page 117</p>

1 MR. KIMREY: Mr. Cain, I have a question,
2 a point of clarification. Shall we deem all exhibits
3 that you are referring to within this deposition as
4 exhibits to this deposition?
5 MR. CAIN: Yes.
6 MR. KIMREY: Thank you.
7 Q. (By Mr. Cain) Are you with me,
8 Mr. Oltmann?
9 A. Yes.
10 Q. Okay. So this affidavit you signed
11 November 13, right?
12 A. Yes.
13 Q. And the purpose --
14 A. November 13th, you said?
15 Q. Yes, sir. 1-3.
16 A. All right. Perfect. Okay.
17 Q. Who asked you to sign an affidavit?
18 A. I don't remember the person.
19 Q. Who were they associated with?
20 A. With Sidney Powell, I do believe.
21 Q. You understood that this affidavit
22 potentially was going to be used by Ms. Powell in
23 connection with litigation?
24 A. Yes.
25 Q. Okay. And you allowed this affidavit to be

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1 filed of record in lawsuits that Ms. Powell was associated
2 with?
3 A. No. I just filed an affidavit, and I
4 signed it.
5 Q. Okay. But your expectation was that this
6 could be used as evidence in a lawsuit Ms. Powell was
7 involved with?
8 A. The only expectation I had was that I was
9 going to sign an affidavit of what I knew.
10 Q. Okay. Well, in terms of what you knew,
11 just looking at the affidavit, I have a few questions.
12 You go over, of course, the antifa call, right?
13 A. Yep. Yes.
14 Q. On page 2.
15 You refer to the call as being on or about
16 the week of September 27. But that's not correct, right?
17 It was prior to that week, true?
18 A. I think that's why I wrote -- they put "on
19 or about." So I had this -- they drafted this. I gave
20 them information. They drafted it. And then I signed
21 it. So there's parts of this that were not complete, or
22 that had pulled stuff out and made it so that the context
23 could be changed.
24 But overall, the information is still
25 accurate because they did put on or around, I think.

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1 Actually, I can't -- yeah, on or about --
2 THE REPORTER: I'm sorry. Whoa, whoa,
3 whoa.
4 Q. (By Mr. Cain) But it's more accurate --
5 THE REPORTER: I just didn't get the last
6 part of your statement, sir. You dropped your voice.
7 THE DEPONENT: I said on or about the week
8 of September 27th.
9 MR. KIMREY: And I just note for the
10 record that Plaintiff's Exhibit 2 is Bates Powell 206
11 through Powell 211.
12 THE REPORTER: Who just spoke?
13 MR. KIMREY: That was Blaine Kimrey.
14 THE REPORTER: Thank you.
15 Q. (By Mr. Cain) All right. To be more
16 accurate, the -- the antifa call -- you say meeting here,
17 but was prior to September 26, not during the week of
18 September 27th, true?
19 A. Well, it says on or about the week of
20 September 27th. So that was still on or about the week.
21 So this had happened before the 26th. So, yes, then this
22 would be factually accurate.
23 Q. And this -- well, this affidavit was done
24 less than two months after the call, right?
25 A. Yes.

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1 Q. And so you did your best to be as complete
2 and accurate in this affidavit as possible, right?
3 A. I -- I gave them a bunch of information.
4 I don't think I gave them completely all the information.
5 Just the information I felt was important to the
6 affidavit.
7 Q. Right.
8 And no one from the Powell camp asked you
9 any of these questions about how did you get on the call
10 in terms of your conduit and that sort of thing, did they?
11 A. I think there's a lot of moving parts at
12 the time, and the things that they were more concerned
13 with was the litany of affidavits that were coming in
14 from across the nation. And it was getting as much of
15 this information as possible so that they could do
16 fact-finding and figure out what the credibility was of
17 all that information collectively, in the middle of
18 having SISA and other organizations within days of the
19 election say that there's nothing to see here, this is
20 the safest election ever, without even doing any sort of
21 discovery into the sheer volume of fraud that was
22 existing across our nation.
23 MR. CAIN: Objection. Nonresponsive.
24 Q. (By Mr. Cain) All I'm asking is: No one
25 from the Powell camp that was involved in obtaining this

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<p>1 affidavit asked to speak to your conduit or interview them 2 associated with confirming your story, fair? 3 A. I didn't have a credibility issue. I 4 didn't have an issue where you -- 5 Q. No, sir. I asked you if they asked for 6 that information. Yes or no? 7 A. No. 8 Q. You say in here, and you wrote in your 9 notes -- you use the word in your notes, "fortifying." 10 But when you're talking about Eric speaking on this -- and 11 this is on the middle of page 2 of the affidavit, Powell 12 207 -- Eric continued with fortifying the groups and 13 recruiting. 14 Okay. Are you referring to Eric Coomer in 15 that sentence? 16 A. Where is this part? 17 Q. It's in -- a little higher than the middle 18 of the page on the second page of your affidavit. You go, 19 The conversation went like this. 20 And then you described the conversation 21 about Eric being the Dominion guy, et cetera? 22 A. What -- what page are you referring to? 23 Q. Sir, I don't -- I've already said that 24 twice now. The second page of your affidavit, Powell 207 25 is the Bates number on the bottom right.</p> <p style="text-align: right;">Page 122</p>	<p>1 terms of fortifying the groups and recruiting? 2 A. So I just answered that question as it 3 relates to them talking about fortifying, right? Again, 4 I referred back to my notes when I had -- when I was 5 writing this stuff, and some of this information is 6 missing other paragraphs that I would have left in it. 7 Right. 8 So the fortifying and saying that, Hey, we 9 need to keep up the pressure, those comments came out of 10 Eric's mouth. Those comments came out of other people's 11 mouths. It was -- it was a centric bit of hyperbole. 12 Q. All right. So you say, Keep up the 13 pressure. You're attributing words to that effect -- to 14 Eric Coomer. What was he referring to about keeping up 15 the pressure? 16 A. I don't know. I would assume it's related 17 to antifa and the things that they are doing across the 18 state of Colorado and the country at that point. I mean, 19 they were terrorizing communities and burning down 20 buildings and looting and shooting and stabbing and 21 throwing frozen water bottles and feces. 22 So it probably had something to do with 23 that. 24 Q. Let me -- let me ask you. You've done a 25 lot of research into antifa, it's clear. What evidence do</p> <p style="text-align: right;">Page 124</p>
<p>1 A. Okay. 2 Q. You're talking about the conversation on 3 the antifa call. At the middle of it, you say, Eric 4 continued with fortifying the groups and recruiting. 5 My question was: You're referring there, 6 obviously, to Eric Coomer, correct? 7 A. I am. 8 Q. All right. I want you to tell me what you 9 remember Eric Coomer saying about fortifying the groups 10 and recruiting specifically. 11 A. So there's a ton of rhetoric going on on 12 the call itself and the comments made about keeping up 13 and fortifying their efforts. There was a bunch of 14 people talking all at the same time. So, you know, Eric 15 was in the middle of communicating on the call, along 16 with all these other people. 17 So when I talk about being excentric and 18 boisterous, it's the -- it's the vulgarness of -- by 19 which they all seem to communicate. The F word is 20 probably every other word. 21 Q. Yes, sir. But you say and swore in this 22 affidavit that Eric did and said certain things. He 23 talked about fortifying the groups and recruiting. 24 A. Right. 25 Q. What specifically did he talk about in</p> <p style="text-align: right;">Page 123</p>	<p>1 you have that Dr. Coomer was involved, outside of this 2 call, as you've alleged, was involved in any 3 activity -- antifa-related activities, whether it's March 4 or speaking at a rally or throwing feces, as you say? 5 What evidence do you have that he actually was part of an 6 antifa movement? 7 A. So -- well, first of all, he posted the 8 antifa manifesto on his Facebook page on, I think, 9 June 5th or June of 6th. 10 Q. And we've talked about the Facebook. I'm 11 talking about -- 12 A. We haven't specifically talked about that 13 particular post. 14 Q. Right. I'll exclude since we don't have 15 time, and we know what -- we can look to in terms of 16 Facebook. I'm asking, based on the amount of time that 17 you spent looking into Eric Coomer and his association 18 with antifa, carving out any kind of Facebook -- 19 A. Okay. I'll bite. All right. Let me walk 20 through -- let me walk through all the information that I 21 learned about Eric Coomer. 22 Q. I'm asking a specific question. Not -- 23 A. That's the specific question. You 24 can't -- you can't carve it out and say you don't want me 25 to answer the question.</p> <p style="text-align: right;">Page 125</p>

<p>1 Q. Here's the question. Here's the question. 2 Listen to my question. 3 A. Okay. 4 Q. What information do you have that -- that 5 puts Eric Coomer in an antifa event, rally, as a speaker, 6 as a member of an association that you -- that you equate 7 with antifa? What specifically do you know about that? 8 A. I know that I was on this call, and I know 9 that Eric at Dominion was on that call. I know that I 10 walked through and listened to other videos that had Eric 11 Coomer on it, and it was the same voice that was on this 12 call, who was on those other calls doing demonstrations 13 across the country. 14 So I know that I did an amazing amount of 15 due diligence to tie back the Eric who was on the antifa 16 call to the Facebook posts, and the likelihood of that 17 happening. And then going even further into that and 18 finding information related to owning the adjudication 19 process -- or excuse me, being a patentholder for the 20 adjudication process for the Dominion voting systems, as 21 well as the numerous affidavits across the country, which 22 as it came to light even after this time, tied back 23 improprieties to Dominion, such as the fact that there is 24 a modum inside the machine, yet the CEO of the Dominion 25 voting system said that there was no modem inside it.</p> <p style="text-align: right;">Page 126</p>	<p>1 Q. All right. I'm talking about any kind of 2 public event that -- that antifa was associated with. 3 Speaker at a rally or anything like that. 4 A. Well, I didn't attend antifa rallies. 5 Q. Have you seen any evidence of that, videos 6 of Dr. Coomer speaking at an antifa rally? 7 A. I have not reviewed any of the antifa 8 videos, and everyone during the summer of 2020 was 9 wearing masks and covering their identity. So getting 10 access -- 11 Q. So your answer is no -- 12 THE REPORTER: Just a moment. One at a 13 time. 14 THE DEPONENT: Apologies. 15 THE REPORTER: Still, one at a time. 16 Q. (By Mr. Cain) Go ahead. 17 A. The difficulty in uncovering who was at 18 any of these antifa rallies, even given the videos that 19 you have there, would be very difficult because of the 20 fact that all their faces were covered. 21 So, you know, can I say for -- with 22 certainty that -- that he was at a -- at an antifa rally, 23 the answer to that question is no. Can I say that he 24 wasn't? The answer to that question would be no, as 25 well.</p> <p style="text-align: right;">Page 128</p>
<p>1 They now have amended that and said, Oh, 2 there is one, but it's not used and it wasn't turned on 3 during the course of the election. 4 Q. I'm asking you about motives. 5 Did you -- have you seen Dr. Coomer at a -- 6 at an antifa really? 7 A. You asked me what information would be 8 provided that would lead me to believe that Eric Coomer 9 was, in fact, a part of antifa and what other information 10 do you have that would lead me to that conclusion. I'm 11 trying to give that you information that led me to that 12 conclusion, and you don't want to hear my opinions. Not 13 because it's not -- 14 Q. Sir, you're wasting time again. 15 Have you seen -- let me -- let me break it 16 down for you. 17 Have you seen video evidence or in-person 18 evidence of Dr. Coomer at what you would consider an 19 antifa rally, yes or no? 20 A. No. 21 Q. Have you seen him speak at -- or at a 22 movement or some event that involved antifa? 23 A. Yes. 24 Q. Which one? 25 A. This call that I was on back in September.</p> <p style="text-align: right;">Page 127</p>	<p>1 Q. Well, you're certain -- and you've said 2 this previously about -- that she's part of a 3 group called Revolution, I think; is that right? 4 A. Yes. 5 Q. Yeah, that's your testimony on that. 6 What group, if you know, is Dr. Coomer 7 involved with that you view as an antifa-related 8 organization? 9 A. Well, most of the antifa members of the -- 10 how you say an idea and not an organization, although 11 it's a very, very well-run organization, do not make 12 themselves known. They do not make themselves 13 associated, because by that association, they would 14 associate with murderers and rapists and people that hurt 15 people in the community and bully them to get them to, I 16 guess, stay in their homes. Intimidate them. 17 Q. So you can't identify a specific 18 organization that you've been able to research and 19 conclude that Dr. Coomer is involved with some leftist 20 organization? 21 A. Yes, I can actually. He proclaimed 22 himself that he was a part of the skinhead movement and 23 in the article written in the New York Times by Susan 24 Dominus, he admitted that he was a part of the skinheads, 25 but it was a special group of skinheads that are against</p> <p style="text-align: right;">Page 129</p>

<p>1 racism.</p> <p>2 So that is a far left organization that</p> <p>3 has strong ties to communism and Marxism, and he was</p> <p>4 by -- self-proclaimed a part of that even dating back to</p> <p>5 his time in Denver, Colorado.</p> <p>6 Q. Thanks. So skinhead organization. Is that</p> <p>7 it?</p> <p>8 A. I don't -- I don't know. I haven't</p> <p>9 done -- I will say for right now, to answer your</p> <p>10 question, yes.</p> <p>11 Q. All right. So when he was talking about,</p> <p>12 as you say in your affidavit, recruiting -- antifa</p> <p>13 recruiting, what specifically was Dr. Coomer saying he</p> <p>14 wanted to do to recruit new members of this group?</p> <p>15 A. Well, I think it was the comments that</p> <p>16 they have collectively where they were agreeing with and</p> <p>17 talking to them about keeping the pressure on and staying</p> <p>18 the course that were directly related to that</p> <p>19 recruitment.</p> <p>20 I don't use it from recruiting from the</p> <p>21 standpoint of walk through a door, knock, knock. Just</p> <p>22 recruitment of making sure we get more people to show up</p> <p>23 to these events.</p> <p>24 Q. Would you describe Dr. -- I'm sorry. I</p> <p>25 thought you were finished.</p> <p style="text-align: right;">Page 130</p>	<p>1 some -- some analysis, I'd like to see it.</p> <p>2 Have you produced any of that information</p> <p>3 to anyone, either the defendants in this case or other</p> <p>4 experts?</p> <p>5 A. No, but I created a chart. So this is the</p> <p>6 stuff that I can get into more specifically. But I</p> <p>7 created a chart that looked at the voting probability of</p> <p>8 people voting a certain way during a time series, and</p> <p>9 then voting a certain way after that time series and the</p> <p>10 likelihood of that actually happening by using previous</p> <p>11 lags as opposed to what happened in the future.</p> <p>12 So using a stationary point, and then</p> <p>13 creating a plotted chart to show me whether or not</p> <p>14 there's any irregularities or errors in the data that</p> <p>15 were -- that would not be probable based upon the</p> <p>16 information that was input.</p> <p>17 Q. So my question is that the charting that</p> <p>18 you used and the datasets -- or the charting that you</p> <p>19 created and the datasets, do you still have that</p> <p>20 information?</p> <p>21 A. I think so.</p> <p>22 Q. Did you -- and you -- but you didn't</p> <p>23 provide it to anybody outside of your own group; is that</p> <p>24 correct?</p> <p>25 A. So that's not necessarily true. I brought</p> <p style="text-align: right;">Page 132</p>
<p>1 A. No.</p> <p>2 Q. Would you describe --</p> <p>3 A. Go ahead.</p> <p>4 Q. Would you describe Dr. Coomer as being one</p> <p>5 of the leaders of the antifa group that was assembled on</p> <p>6 this call?</p> <p>7 A. No. Nor did I at the time believe that he</p> <p>8 was actually -- after doing research, that he would</p> <p>9 associate himself with antifa.</p> <p>10 Q. You mention -- I don't want to spend a lot</p> <p>11 of time on this.</p> <p>12 So at the end of your affidavit, the last</p> <p>13 full paragraph, you talk about you used ARIMA, A-R-I-M</p> <p>14 analysis to show trends.</p> <p>15 A. Yeah.</p> <p>16 Q. Do you remember that?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay. Do you have that analysis handy</p> <p>19 still?</p> <p>20 A. I have some of the information related to</p> <p>21 what I did on the -- on other analyses later, but ARIMA</p> <p>22 is -- uses -- I mean, do you know what ARIMA is.</p> <p>23 Q. I know what it stands for. But I guess my</p> <p>24 question is: If I -- you talk about it in your affidavit.</p> <p>25 If you have datasets involved with that, if you have</p> <p style="text-align: right;">Page 131</p>	<p>1 some of those charts to Washington, D.C. in early</p> <p>2 January. I provided that information as it relates to</p> <p>3 Dominion voting systems and the vulnerabilities that they</p> <p>4 had in the Dominion voting systems. And the process of</p> <p>5 walking a through path of Dominion to the Black Box, to</p> <p>6 how they recover those votes, how it's transferred over</p> <p>7 to SCYTL, how SCYTL goes on to Edison, how Edison then</p> <p>8 translates that over to the New York Times.</p> <p>9 Q. Right. And you talked about that in your</p> <p>10 August 18 testimony from -- when Sidney Powell's lawyers</p> <p>11 were asking you about this issue, right?</p> <p>12 A. Yes.</p> <p>13 Q. And you said then that you know how</p> <p>14 Dr. Coomer can flip the Election, to use your words,</p> <p>15 right?</p> <p>16 A. Is that what I said?</p> <p>17 Q. Yes. You said you know how Dr. Coomer</p> <p>18 flipped the election.</p> <p>19 A. Is that what I said?</p> <p>20 Q. Yes.</p> <p>21 A. I haven't seen the transcript.</p> <p>22 MS. HALL: Well, Charlie, the reason he's</p> <p>23 asking you is you obviously have a copy of the</p> <p>24 transcript. We haven't seen the transcript yet. So</p> <p>25 where did you get the transcript?</p> <p style="text-align: right;">Page 133</p>

<p>1 MR. CAIN: Sidney Powell's lawyers sent it 2 to everybody. 3 MS. HALL: Well, I haven't seen it. I 4 didn't get it. 5 MR. CAIN: Well, that's not on me. 6 MS. HALL: I didn't say it was. I'm just 7 saying he hasn't seen the transcript. 8 THE DEPONENT: No. Show me 9 the transcript. 10 MR. CAIN: All right. So here on 11 page 181 -- 12 MR. ARRINGTON: This Barry Arrington. I'm 13 going to put on the record that I sent the transcript to 14 everyone. 15 THE REPORTER: Who just spoke? 16 MR. ARRINGTON: This is Barry Arrington. 17 I don't know why you're saying you haven't 18 seen it. I sent it to everyone. 19 MS. HALL: I'm not saying you didn't, 20 Barry. I'm just saying I did not receive anything, and 21 neither did Ingrid. So that's all I'm saying. 22 Q. (By Mr. Cain) I'll go about it this way 23 since we don't have -- 24 A. Therefore, I haven't reviewed it. 25 Q. Outside of the transcript -- I mean, you</p> <p style="text-align: right;">Page 134</p>	<p>1 written format or report. 2 Have you done that now? Have you prepared 3 a report reflecting your analysis? 4 MS. HALL: Objection. Relevance. 5 A. No. I did. I provided a diagram -- a 6 very crude diagram that the public can understand. I 7 worked on the deviations between the -- four deviations 8 that happened inside the Dominion system. 9 Q. (By Mr. Cain) Okay. Let me make sure -- I 10 want to make sure we get this on the record. 11 A. Can you hear me? 12 Q. Yeah, who's speaking? 13 MR. KIMREY: I'm sorry. This is Blaine 14 Kimrey. 15 So we're new to this matter. I'm 16 wondering, just for clarification, Mr. Cain, if you have 17 a copy of the sworn statement, could you enter it in the 18 deposition since you're talking about it a lot? 19 And Mr. Oltmann has acknowledged that he did give a sworn 20 statement, so maybe if we could actually see it and he 21 could confirm it as entered in the deposition, that would 22 make everything easier to follow. Just a suggestion. 23 MR. CAIN: I appreciate it. I'm moving 24 off that now because I asked him the question outside of 25 this sworn statement, and I'm not -- I just don't have</p> <p style="text-align: right;">Page 136</p>
<p>1 can just testify now. Do you or do you not know how 2 Dr. Coomer flipped the Election? 3 A. I believe I know how the election was 4 influence and/or stolen, yes. 5 Q. And I -- you used a passive. I asked -- I 6 said Dr. Coomer. You know how Dr. Coomer, at least 7 according to your -- your analysis, how he was involved in 8 flipping the election, true? 9 A. I know that Coomer was a director of 10 strategy and security for Dominion voting systems, and in 11 that capacity and owning the adjudication process 12 in -- in that system, I know where the election 13 was -- was affected, yes. I know where it was 14 compromised. 15 And Eric Coomer is responsible for those 16 things, and therefore, I think that I know -- actually I 17 know that I know -- how Dominion was able to affect or 18 leave open vulnerabilities to allow for the election to 19 be stolen. 20 Q. Right. And you've testified -- you've 21 testified at length in questions from Ms. Powell's lawyers 22 about that specific topic, right? 23 A. Yep. 24 Q. Just a few weeks ago. And you said that 25 you hadn't reduced, as of that time, your analysis to some</p> <p style="text-align: right;">Page 135</p>	<p>1 time to address that. 2 Q. (By Mr. Cain) So let me -- let me get back 3 on to what I was talking about. You had testified that 4 you -- that you had done analysis in this -- of behavioral 5 deviations and tech deviations, it's part of what you 6 said. 7 And then I asked you, Has this been reduced 8 to writing? And you said it -- you referenced a schematic 9 or something that we could all understand. Is that fair? 10 A. Yes. So I've been assisting with 11 gathering information related to how the Dominion system 12 works. So I was able to -- I've done it in different 13 parts, related to even like the ICX machine, the ability 14 to bypass the ICX in cases of balance outstanding or the 15 alignment being off. 16 So I've done multiple things where I've 17 written out diagrams on how the system can be 18 manipulated -- be manipulated inside of the -- inside of 19 the Dominion system, depending on which part you have. 20 Q. Well, we'll conclude on this as probably 21 the last topic. On Exhibit 103, which we previously 22 marked from your recent disclosures, this is 23 Document 0 -- I believe it's small -- but it is 0881, 24 which is a diagram -- it looks like a voting system 25 diagram. I want you to --</p> <p style="text-align: right;">Page 137</p>

<p>1 (Phone ringing.)</p> <p>2 THE REPORTER: Just a moment. I can't</p> <p>3 hear.</p> <p>4 THE DEPONENT: I don't know why it came</p> <p>5 through my phone. Hold on.</p> <p>6 Q. (By Mr. Cain) So Exhibit 103 has a diagram</p> <p>7 that I think is what you're referring to. Can you confirm</p> <p>8 that this is the diagram that you were just talking about?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So the -- the work that you've done</p> <p>11 regarding -- at least as of this date regarding</p> <p>12 Dr. Coomer's participation in flipping the election, in</p> <p>13 part, is reflected on this particular diagram that we're</p> <p>14 looking at, correct?</p> <p>15 A. Those -- that diagram walks through the</p> <p>16 vulnerabilities of the Dominion voting systems and the</p> <p>17 possible ways to, what I call, big cons and small cons.</p> <p>18 Small cons to keep you distracted, and the big con of how</p> <p>19 you were able to take invalidated fraudulent votes and</p> <p>20 then reconnect them with people that vote.</p> <p>21 Q. And your -- your conclusion is that</p> <p>22 Dr. Coomer's part of the big con; is that right?</p> <p>23 A. My conclusion is that -- that Eric made</p> <p>24 comments related to making sure that President Trump was</p> <p>25 not going to win. And I did not make statements related</p> <p style="text-align: right;">Page 138</p>	<p>1 what I've said, not once.</p> <p>2 Q. Well, and you've said, in fact, that</p> <p>3 he -- you -- at least in your last testimony, that you're</p> <p>4 95 percent sure that he actually engaged in that activity</p> <p>5 of flipping the election.</p> <p>6 A. I don't have a transcript.</p> <p>7 THE REPORTER: I'm sorry. I can't</p> <p>8 understand Ms. Hall.</p> <p>9 A. I don't even know if that's a question or</p> <p>10 not.</p> <p>11 Q. (By Mr. Cain) Yeah. You have a high</p> <p>12 degree of certainty -- you've testified already --</p> <p>13 A. I do.</p> <p>14 Q. -- in the deposition with the Powell</p> <p>15 attorneys that you have a 95 percent degree of certainty</p> <p>16 that Dr. Coomer was involved in flipping the election.</p> <p>17 A. Yes.</p> <p>18 Q. All right. By the way, while I'm thinking</p> <p>19 about it, you -- do you hold yourself out as an election</p> <p>20 security expert?</p> <p>21 MS. HALL: Objection. Relevance.</p> <p>22 A. No, I'm a data guy.</p> <p>23 Q. (By Mr. Cain) Okay. So you would agree</p> <p>24 with me that you are not an election security expert?</p> <p>25 MS. HALL: Objection.</p> <p style="text-align: right;">Page 140</p>
<p>1 to that Biden was going to win because I didn't hear</p> <p>2 that. I just heard that President Trump was not going to</p> <p>3 win, and those came from him.</p> <p>4 And I validated him, and then after that I</p> <p>5 validated his social posts, which are very boisterous</p> <p>6 and -- that validate that -- number one, he's not in a</p> <p>7 position where he could influence it. And number 2, he</p> <p>8 said he would influence it. And number 3, that his clear</p> <p>9 bias and hatred for just the country, police officers,</p> <p>10 and his support for antifa was -- was well noted.</p> <p>11 Q. (By Mr. Cain) Okay. Well, that's</p> <p>12 different than what you've testified to before in terms</p> <p>13 of --</p> <p>14 A. How is that different?</p> <p>15 Q. -- to actually having -- I had understood</p> <p>16 that you said from a technical standpoint, Dr. Coomer was</p> <p>17 involved in rigging the election, which would affect</p> <p>18 results, and you even testified to this -- in places like</p> <p>19 Antrim County; in Mesa County, Colorado; and Cobb County,</p> <p>20 Georgia?</p> <p>21 A. That he would have the ability to do that</p> <p>22 and he's in a position to do that, absolutely.</p> <p>23 Q. Okay.</p> <p>24 A. I was very clear on that. I've been clear</p> <p>25 the entire time. I've never once changed anything about</p> <p style="text-align: right;">Page 139</p>	<p>1 THE DEPONENT: Should I answer?</p> <p>2 A. Okay. So I built a system that</p> <p>3 develops --</p> <p>4 THE REPORTER: I'm sorry. I'm sorry, sir.</p> <p>5 Can you slow down just a bit?</p> <p>6 A. I built a system that creates quality</p> <p>7 scores, relevant inspectors, and correlations of data on</p> <p>8 individual DNA of an individual. I built the</p> <p>9 architecture behind a system that allows for us to</p> <p>10 perform very well, actually above anyone else in the</p> <p>11 country related to how we position messaging in front of</p> <p>12 millions of people. I built that.</p> <p>13 We're one of the largest first-party data</p> <p>14 aggregators in the nation when I ran my company. I know</p> <p>15 that within a couple of days of me coming out and talking</p> <p>16 about what information I did have, I had death threats.</p> <p>17 I know that that -- those death threats have continued</p> <p>18 through the last nine months.</p> <p>19 Q. (By Mr. Cain) Sir, my question was</p> <p>20 election security expert. Do you hold yourself out as an</p> <p>21 expert in election security issues?</p> <p>22 A. I would hold myself out as an expert in</p> <p>23 system architecture. I would hold myself out at -- and I</p> <p>24 can prove over time as a two-time Ernst & Young</p> <p>25 entrepreneur of the year nominee and one-time finalist in</p> <p style="text-align: right;">Page 141</p>

<p>1 2020, after going through some rigorous tests by many of 2 the people on those panels, that I know what I'm talking 3 about when it comes to code and when I'm talking about 4 when you are talk about the Black Box, RUP kits, having 5 people overseas write code for you. What the 6 implications are of having connections to different 7 systems that are not secured. Having internet access 8 with the ability to access those systems. 9 From an architecture standpoint, I could 10 punch holes in what Dominion has built over and over and 11 over again. I don't need to know that you have to take a 12 stack of votes and put it through the system. I have to 13 know that you can secure those votes through technology 14 that allows for transparency, which is what the system is 15 supposed to be built on. 16 Q. You're -- you're speaking quickly, which is 17 find except for Laurel. She's probably going to kill both 18 of us after this deposition. 19 My -- you're not answering my question. 20 A. I did answer your question. 21 Q. Have you -- let me ask a different question 22 and see if you can answer this one. 23 Do you have any experience working in 24 elections or in election security? 25 MS. HALL: Objection. Relevance.</p> <p style="text-align: right;">Page 142</p>	<p>1 certain things that you have to do in order to secure a 2 system. 3 I did and was a CEO of a company that did 4 MSP services, so I understand that's Managed Service 5 Provider, which is the IOT of an internet of things -- 6 THE REPORTER: I'm sorry. Of the 7 internet? I just didn't hear the word. 8 THE DEPONENT: Internet of things. 9 Q. (By Mr. Cain) I-O-T. 10 A. We also have an e-commerce platform that 11 is a headless design. It services some fortune 100 12 companies in the United States. So I'm very familiar 13 with security, and as it relates to how the systems 14 interconnect and the API that are available, how to move 15 things offline and online. How to find out or discover 16 whether or not something is or is not connected to the 17 internet, and the probability of those things being 18 connected to the internet by way of looking at the math 19 and science, which is why I used mathematical equations 20 to figure out whether or not this is probable. 21 So it leads me back to fact-checking the 22 information related to the system architecture. It's a 23 simple process that anyone that's involved in technology 24 goes through in order to make sure that they can validate 25 or invalidate their theory.</p> <p style="text-align: right;">Page 144</p>
<p>1 Q. (By Mr. Cain) You can answer. 2 MS. HALL: Please explain how this is 3 relevant to your defamation claim, Charlie. 4 MR. CAIN: Nope. 5 MS. HALL: Okay. Well, then move on. And 6 you're done. 7 MS. DEFRANCO: He's done. 8 MS. HALL: What's the time? 9 THE VIDEOGRAPHER: It's three hours and 10 three minutes. 11 MS. HALL: Thanks. We're done, Charlie. 12 A. Can I answer this last question? 13 Q. (By Mr. Cain) Yeah. You're going to 14 answer potentially more, but why don't you finish 15 this with -- we have tomorrow, obviously set aside as 16 well, but go ahead. 17 MS. HALL: No. Charlie. You have PCU 18 United tomorrow, Shuffling Madness, and CD Solutions. So 19 there will be no questions that are posed to Mr. Oltmann. 20 A. I'm going to answer this question if I can 21 because it's fresh in my mind. 22 THE DEPONENT: Can I answer it? 23 A. Okay. I have not worked in Dominion, 24 Sequoia, ESNS, Hart, Clear Ballot, I've never worked 25 inside of an election system. With that said, there are</p> <p style="text-align: right;">Page 143</p>	<p>1 In this case the theory came back, and I 2 was able to look at what would probably happen in Georgia 3 as an example on early January that related to, and it 4 came true. The system came down, it came back up. We 5 were able to validate other information that we call 6 offline information in order to validate that there was a 7 probable system interference. 8 Now, whether or not that system 9 interference was caused by Dominion is -- is not 10 even -- it's not even up for debate. It's not up for 11 debate. Dominion has a system that Antrim, Mesa County, 12 and other counties were able to validate would show that 13 in the math of how they calculate votes. 14 Dominion was complicit in that behavior, 15 that is -- and I think that I have enough expertise and 16 technology that I can come to that conclusion without 17 actually working for Dominion. 18 MR. CAIN: I'm prepared to move forward 19 with additional questions which counsel seems to believe 20 that -- 21 MS. HALL: We're done. No, your three 22 hours is up, Charlie. I'm going to do some clarification 23 now with my client here. 24 ///// 25 /////</p> <p style="text-align: right;">Page 145</p>

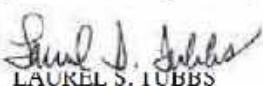
<p>1 EXAMINATION</p> <p>2 BY MS. HALL:</p> <p>3 Q. So, Joe, you were asked by Mr. Cain about</p> <p>4 this contact for your ability to get on a call. Who -- or</p> <p>5 not who reached out to you, but did you reach out to that</p> <p>6 person or --</p> <p>7 A. No.</p> <p>8 Q. -- did they reach out to you?</p> <p>9 Explain that.</p> <p>10 A. They reached -- they reached out to me.</p> <p>11 Q. Can you explain that a little bit more?</p> <p>12 A. I never made a proactive approach to a</p> <p>13 person that got me on the antifa call. I wasn't the one</p> <p>14 that did the reaching out. They reached out to me.</p> <p>15 Q. And what was the purpose of you getting on</p> <p>16 that call?</p> <p>17 A. It was just to discover antifa</p> <p>18 journalists. And if you go back to October 15th, I</p> <p>19 believe it was, I'd have to check -- either October 15th</p> <p>20 or 14th, I was in an FEC meeting. And I said, We have</p> <p>21 been -- we have infiltrated antifa. Based on that call,</p> <p>22 that I got all the information I was able to collect</p> <p>23 afterwards, that said that, Hey, we were able to uncover</p> <p>24 these antifa journalists and uncover these antifa</p> <p>25 journalists, the next day an antifa journalist wrote an</p> <p style="text-align: right;">Page 146</p>	<p>1 THE REPORTER: Who's speaking?</p> <p>2 MR. ARRINGTON: This is Barry Arlington.</p> <p>3 MS. HALL: No. No. Barry, we're not</p> <p>4 going to -- we're not going to agree to that.</p> <p>5 MR. ARRINGTON: I don't care if you agree,</p> <p>6 Andrea. This is a deposition. I'm counsel at the</p> <p>7 deposition, and I'm going to do some cross-examination.</p> <p>8 EXAMINATION</p> <p>9 BY MR. ARRINGTON:</p> <p>10 Q. My first question -- so, Mr. Oltmann, I</p> <p>11 have a couple of questions about your prior testimony.</p> <p>12 The question is this: In response to one of Mr. Cain's</p> <p>13 questions, you said about -- about whether Dr. Coomer was</p> <p>14 affiliated with antifa. I thought you said, Nor did I</p> <p>15 believe --</p> <p>16 THE REPORTER: I'm sorry. Just a moment.</p> <p>17 Just a moment. Just a moment. Just a moment. Just a</p> <p>18 moment, please. There are multiple people talking, and I</p> <p>19 cannot hear the question.</p> <p>20 MR. ARRINGTON: I'll repeat the question.</p> <p>21 Q. (By Mr. Arrington) So I believe you said</p> <p>22 in response to one of Mr. Cain's questions about</p> <p>23 Dr. Coomer's association with antifa, that, quote -- I</p> <p>24 tried to jot this down -- quote, Nor did I believe after</p> <p>25 conducting research he, meaning Dr. Coomer, would</p> <p style="text-align: right;">Page 148</p>
<p>1 article about the fact that I had threatened antifa</p> <p>2 journalists on that -- in that FEC meeting.</p> <p>3 That was prior to the election, before I</p> <p>4 even knew Dominion's name. I knew their name, but I</p> <p>5 didn't know the significance of Dominion across the</p> <p>6 country.</p> <p>7 Q. And these journalists were actually doxing</p> <p>8 you, correct?</p> <p>9 A. Yes, and they were using -- they weren't</p> <p>10 just doxing me. They were doxing other people. They</p> <p>11 were using systems and relationships that they had.</p> <p>12 People that were working in other places, such as working</p> <p>13 in vet centers. That they would gather information of</p> <p>14 people that owned pets, and they would report those pets</p> <p>15 to the animal control to say that they were abusing their</p> <p>16 animals.</p> <p>17 They would report people for their kids,</p> <p>18 to CPS, that said that they were abusing their kids. So</p> <p>19 they used their positions in this web of -- or group of</p> <p>20 people in order to intimidate, threaten, dox, and cause</p> <p>21 harm to other people in the community. It wasn't just</p> <p>22 me.</p> <p>23 MS. HALL: Okay. We're complete.</p> <p>24 MR. ARRINGTON: I'm going to have some</p> <p>25 follow up.</p> <p style="text-align: right;">Page 147</p>	<p>1 associate himself with --</p> <p>2 Did I -- did I misunderstand you? I</p> <p>3 thought you believed that he was associated with antifa.</p> <p>4 A. Yes, I did. So let me clarify that. This</p> <p>5 is the context part where it's taken out of -- when I did</p> <p>6 the original research on Eric Coomer, and I found out</p> <p>7 that he had a doctorate in nuclear engineering, I did</p> <p>8 not, at that point in time back in September, feel that</p> <p>9 he was -- he wasn't my target. I thought maybe he was</p> <p>10 CIA or FBI.</p> <p>11 I did not believe -- I couldn't understand</p> <p>12 why someone who was -- had a doctorate in nuclear</p> <p>13 engineering would associate himself with antifa. And</p> <p>14 since he wasn't the person I was looking for at the time,</p> <p>15 I just filed all this stuff away for Eric Coomer as he</p> <p>16 was on that call, but I didn't understand the</p> <p>17 significance of it. Does that make sense?</p> <p>18 When I verify that that's who he was, it</p> <p>19 just didn't seem normal to me that a person that has a</p> <p>20 doctorate in -- in nuclear engineering would be involved</p> <p>21 in this type of -- in this type of organization.</p> <p>22 So as I went through and revalidated</p> <p>23 information related to his social posts and started doing</p> <p>24 more research on Mr. Coomer and, you know, his history of</p> <p>25 being involved in the skinhead movement and some of the</p> <p style="text-align: right;">Page 149</p>

<p>1 other things that he had done related to information 2 we've been able to dig up, I certainly believe that he 3 was a part of the antifa movement and had a significant 4 role in antifa just based on someone else knowing who he 5 was and what his capabilities are and the breadth of what 6 Dominion voting systems does across the nation, the 7 influence that they have. 8 Does that clarify that? 9 Q. (By Mr. Arrington) Yes. Thank you. 10 You also said that you provided certain 11 information to Ms. Powell. I'm going to -- I'm sorry for 12 this. For some reason there was a misdirection that you 13 didn't get the transcript of your testimony from last 14 month. 15 But at one point -- I'm reading from the 16 transcript -- it says -- you testified that you may have 17 sent Sidney Powell some of this information. 18 MR. ARRINGTON: And for counsel's 19 information, I'm reading from page 138, starting at 20 line 4. I'll start over. 21 Q. (By Mr. Arrington) And you testified that 22 you may have sent Sidney Powell some of this information 23 you were gathering. You have specific recollection that 24 you did send it to her? If so, when? 25 And you answered, So other than the</p> <p style="text-align: right;">Page 150</p>	<p>1 certain things about Mr. Coomer. One of which is being a 2 part of the skinhead movement. Two, the way that he 3 spoke was -- you know, it's pretty -- it's pretty vulgar. 4 And where he speaks that vulgarity and how he speaks it, 5 lend credibility to how antifa acts as well. 6 Then you have the -- the information that 7 Eric wrote specifically about his wife where he talked 8 about sexually battering, urinating on, making bark like 9 a dog and some of the other things that Eric did. And 10 then publicly put that information out there in an effort 11 to humiliate his wife. 12 Then there's the -- the post that he put 13 up, and the things that he admitted to about being a drug 14 addict and getting in fights and being the person that -- 15 that not only is -- you know, I guess a nuclear student 16 or a physicist, that is -- that can beat up people. 17 Right? 18 And I'm paraphrasing some of the things 19 that I have learned about him. And then you look at the 20 other things that came up related to how he treats 21 people, and talking about other people that had worked 22 with Eric Coomer. 23 So there's just not a lot of redeeming 24 stuff that's out there about Eric Coomer relating to -- 25 Q. Let me ask you this: Did you have any</p> <p style="text-align: right;">Page 152</p>
<p>1 information that I had provided, if I had sent anything to 2 Sidney, it would have been with Randy Corporon on it as 3 far as lawyer to lawyer. 4 So is it a fact that you're -- you did not 5 communicate directly with Ms. Powell, that -- that you 6 communicated with her through Mr. Corporon? 7 A. Yeah. So I -- I'm going to say this 8 because I actually went back and listened to everyone 9 else's depositions as well. I did not have any direct 10 conversations with Sidney Powell. All right? Those 11 conversations happened through attorneys. So me and 12 Sidney Powell directly did not have any conversations. 13 Q. So you've testified that you've done 14 extensive research regarding Dr. Coomer; is that correct? 15 A. Yes. 16 Q. Can you summarize some of the things that 17 you found out about his background that you have personal 18 knowledge of in terms of your research that would lead 19 you -- that would lend credence to your accusation that he 20 was associated with antifa and that he was a -- I don't 21 remember your exact words, but a -- someone who was an 22 agitator or aggressive or however you want to suggest 23 that? 24 A. Well, there's someone that -- yeah, so as 25 I went through and did research, I was able to uncover</p> <p style="text-align: right;">Page 151</p>	<p>1 occasion to find out anything that he personally said 2 about his own mental health? 3 A. It -- 4 MR. CAIN: Let me -- hold on, Mr. Oltmann. 5 Mr. Arrington, I've done this in prior depositions, and I 6 don't want there to be -- my silence to be 7 misinterpreted. That I believe you're outside of the 8 scope of the discovery order, and I would object on that 9 basis. But out of deference to you, if I can just have 10 that running understanding, I won't interrupt your 11 questions. 12 MR. ARRINGTON: I appreciate that, 13 Mr. Cain. I would suggest that everything that I'm 14 talking about here can be tied back into questions that 15 you asked on direct. So if the court reporter could read 16 back the question, I'd appreciate it. 17 (The last question was read.) 18 A. The answer is yes. He had a writing where 19 he said that -- again, I'm trying to find the writings 20 himself. But admits to being bipolar, admits to having 21 a drug problem, admits to lying multiple times, not just 22 the times that he's admitted to lying when he said that 23 the posts were fabricated or deleting information. So 24 he -- there's a habit, I would say, of -- of this. 25 Q. (By Mr. Arrington) But did your research</p> <p style="text-align: right;">Page 153</p>

<p>1 lead to crimes, such as DUIs and jail time?</p> <p>2 MR. CAIN: Same objections.</p> <p>3 Barry, I didn't understand from your prior</p> <p>4 comment if you'll agree that I can just have a running</p> <p>5 objection. We can disagree about scope issues or</p> <p>6 propriety of going outside of the discovery order. But</p> <p>7 if I can have a running objection, I won't have to make</p> <p>8 it.</p> <p>9 MR. ARRINGTON: Yes. We can disagree</p> <p>10 whether my cross relates back to your direct and,</p> <p>11 therefore, it would be within the discovery order, and to</p> <p>12 the extent that your direct was within the discovery</p> <p>13 order. And yes, we can agree to your standing objection.</p> <p>14 MR. CAIN: Thank you.</p> <p>15 THE REPORTER: I'm sorry. Just a moment.</p> <p>16 Counsel, there -- Counsel, there is background noise</p> <p>17 coming through Mr. Arrington's mic that I'm having</p> <p>18 trouble hearing you all the time, Mr. Arrington.</p> <p>19 MR. ARRINGTON: I'm sorry about that.</p> <p>20 Could you repeat the last question or</p> <p>21 reread the last question?</p> <p>22 (The last question was read.)</p> <p>23 MR. ARRINGTON: That was the question</p> <p>24 before last. Let me make another run at it.</p> <p>25 Q. (By Mr. Arrington) Did you have occasion</p> <p style="text-align: right;">Page 154</p>	<p>1 How quickly can you produce that?</p> <p>2 THE REPORTER: How soon would you like it?</p> <p>3 MR. KIMREY: I don't want to engage in any</p> <p>4 sort of cruel and unusual request. You know, I don't</p> <p>5 know what else you have. What's reasonable for you given</p> <p>6 other things you need to work on?</p> <p>7 (Discussion off the record.)</p> <p>8 MR. ARRINGTON: This is Barry Arlington.</p> <p>9 Do we have to order today or can we order later? Can we</p> <p>10 put --</p> <p>11 THE REPORTER: You can order later if</p> <p>12 you'd like.</p> <p>13 MR. ARRINGTON: Okay. Thank you.</p> <p>14 THE REPORTER: Mr. Cain, your order?</p> <p>15 MR. CAIN: Whatever Scotty says. I</p> <p>16 believe we did a one-day turnaround expedite.</p> <p>17 MS. HALL: And this is Andrea Hall. We'll</p> <p>18 just -- whatever, I guess -- yeah, reading and signing.</p> <p>19 I don't know what your turnaround is on that, but, yeah,</p> <p>20 we'll take the reading and signing.</p> <p>21 THE REPORTER: Have I covered ordering,</p> <p>22 counsel?</p> <p>23 MS. BOEHMER: This is Margaret Boehmer on</p> <p>24 behalf of Eric Metaxas. We'll take an Etran. We don't</p> <p>25 need it expedited, and we do not need a rough.</p> <p style="text-align: right;">Page 156</p>
<p>1 to -- to find out any information about whether he had</p> <p>2 committed DUIs and been in jail?</p> <p>3 A. Yes. He bragged about that in some posts</p> <p>4 that he put on a blog site -- I believe it was a Google</p> <p>5 blog site -- about having a good lawyer, otherwise, he</p> <p>6 would have spent quite a bit of time in jail.</p> <p>7 And then through subsequent information</p> <p>8 that I was able to uncover, it showed that he had</p> <p>9 multiple DUIs.</p> <p>10 MR. ARRINGTON: That's all of my</p> <p>11 questions. Thank you.</p> <p>12 MR. CAIN: Well, unless counsel for</p> <p>13 Mr. Oltmann is going to allow us to continue, we're done</p> <p>14 for today.</p> <p>15 MS. HALL: No. We're done.</p> <p>16 THE VIDEOGRAPHER: Going off -- going off</p> <p>17 the record/, the time is 2:07.</p> <p>18 (Video deposition concluded.)</p> <p>19 THE REPORTER: Same orders, Counsel?</p> <p>20 Transcript orders?</p> <p>21 MR. KIMREY: I don't know what those</p> <p>22 orders are. I can tell you what I want, though. Should</p> <p>23 I do that?</p> <p>24 THE REPORTER: Yes.</p> <p>25 MR. KIMREY: So I'd like a rough ASCII.</p> <p style="text-align: right;">Page 155</p>	<p>1 THE REPORTER: Other counsel?</p> <p>2 MR. HOLWAY: This is Eric Holway on behalf</p> <p>3 of the Trump campaign, and I would like an e-transcript</p> <p>4 as well, please. And no, I don't need it expedited.</p> <p>5 Thank you.</p> <p>6 THE REPORTER: Any other counsel? No?</p> <p>7 I'm off the record.</p> <p>8 * * * * *</p> <p>9 WHEREUPON, the foregoing deposition was</p> <p>10 concluded at the hour of 2:11 p.m. Total time on the</p> <p>11 record was 3 hours and 25 minutes.</p> <p style="text-align: right;">Page 157</p>

1 I, JOSEPH OLTMANN, the deponent in the
2 above deposition, do hereby acknowledge that I have read
3 the foregoing transcript of my testimony and state under
4 oath 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 JOSEPH 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 Job No. TX4792290

Page 158

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 at the time and place herein set
11 forth and thereafter reduced to a typewritten form; that
12 the foregoing constitutes a 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 
20 LAUREL S. TUBBS
21 Registered Professional Reporter,
22 Certified Realtime Reporter
23 and Notary Public
24
25

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1 Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
2 Joseph Oltmann Job No. 4792290
3 ERRATA SHEET
4 PAGE _____ LINE _____ CHANGE _____
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21 REASON _____
22 _____
23 _____
24 Joseph Oltmann Date _____
25

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1 defrancoi@yahoo.com
2 September 9, 2021
3 RE: Coomer, Eric, Ph.D. v. Donald J. Trump For President, Inc.
4 DEPOSITION OF: Joseph Oltmann 4792290
5 The above-referenced witness transcript is
6 available for read and sign.
7 Within the applicable timeframe, the witness
8 should read the testimony to verify its accuracy. If
9 there are any changes, the witness should note those
10 on the attached Errata Sheet.
11 The witness should sign and notarize the
12 attached Errata pages and return to Veritext at
13 errata-tx@veritext.com.
14 According to applicable rules or agreements, if
15 the witness fails to do so within the time allotted,
16 a certified copy of the transcript may be used as if
17 signed.
18 Yours,
19 Veritext Legal Solutions
20
21
22
23
24
25

Page 161

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

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

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**Exhibit
PX 0103**
Oltmann

Joe Oltmann <joe@fecunited.com>

Responding to your LinkedIn message

5 messages

Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 6:42 PM

To: "Chanel.rion@oann.com" <Chanel.rion@oann.com>

Hi Chanel,

Thought I would send you an email with my contact information. I had already sent OANN a package of screenshots and docs. I can also resend those.

Thanks.

Warm regards,

Joe Oltmann

303-667-5105

Chanel Rion <Chanel.Rion@oann.com>

Sun, Nov 15, 2020 at 6:50 PM

To: Joe Oltmann <joe@fecunited.com>

Hi! Please do. I'm working on an investigation special - working with Rudy and Sidney, would like to include you in the special.

Would you be available to Skype tomorrow?

Best,
Chanel

Sent from my iPhone

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 7:04 PM

To: Chanel Rion <Chanel.Rion@oann.com>

Yeah depending on the time. I have meetings in the morning. I open up at 1 MST for an hour and done for the day at 430 pm MST. Apologies for the restraints. I have a company to run in the middle of all this. Appreciate the attention to this. I already sent the package to Sidney Powell's team Don, Lauren

and Lynda as well as to Jenna Ellis. I certainly can resend it as well.

Warm regards,

Joe

[Quoted text hidden]

Chanel Rion <Chanel.Rion@oann.com>
To: Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 7:06 PM

Excellent. That's 11am EST - I only need 15 minutes. Time constraints certainly understandable
- I think we're all in the same boat!

I look forward to any materials you deem useful.

Chanel Rion

Chief White House Correspondent

One America News Network

101 Constitution Ave. NW

Washington, D.C. 20001

Office: 202-849-3391

Cell: 254-413-0035

Twitter: @ChanelRion

Chanel's Broadcasts: <https://www.youtube.com/playlist?list=PLaJp7NK1-soc9bSnbkyDLJIOckvbkC4e7>

STREAM OAN | <http://shorturl.at/jsJW5>
OAN FACEBOOK | <http://shorturl.at/yEIN6>
OAN TWITTER | <https://twitter.com/OANN>
OAN YOUTUBE | <http://shorturl.at/dhV29>

From: Joe Oltmann <joe@fecunited.com>
Sent: Sunday, November 15, 2020 9:04:13 PM
To: Chanel Rion
Subject: Re: Responding to your LinkedIn message

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Chanel Rion <Chanel.Rion@oann.com>

Sun, Nov 15, 2020 at 7:09 PM

If it is less than a half hour, I can do 11 am EST. 🙄 That is 9 am my time. I'm in Colorado, so two hours behind you. I will send the files. Thank you Chanel.

[Quoted text hidden]

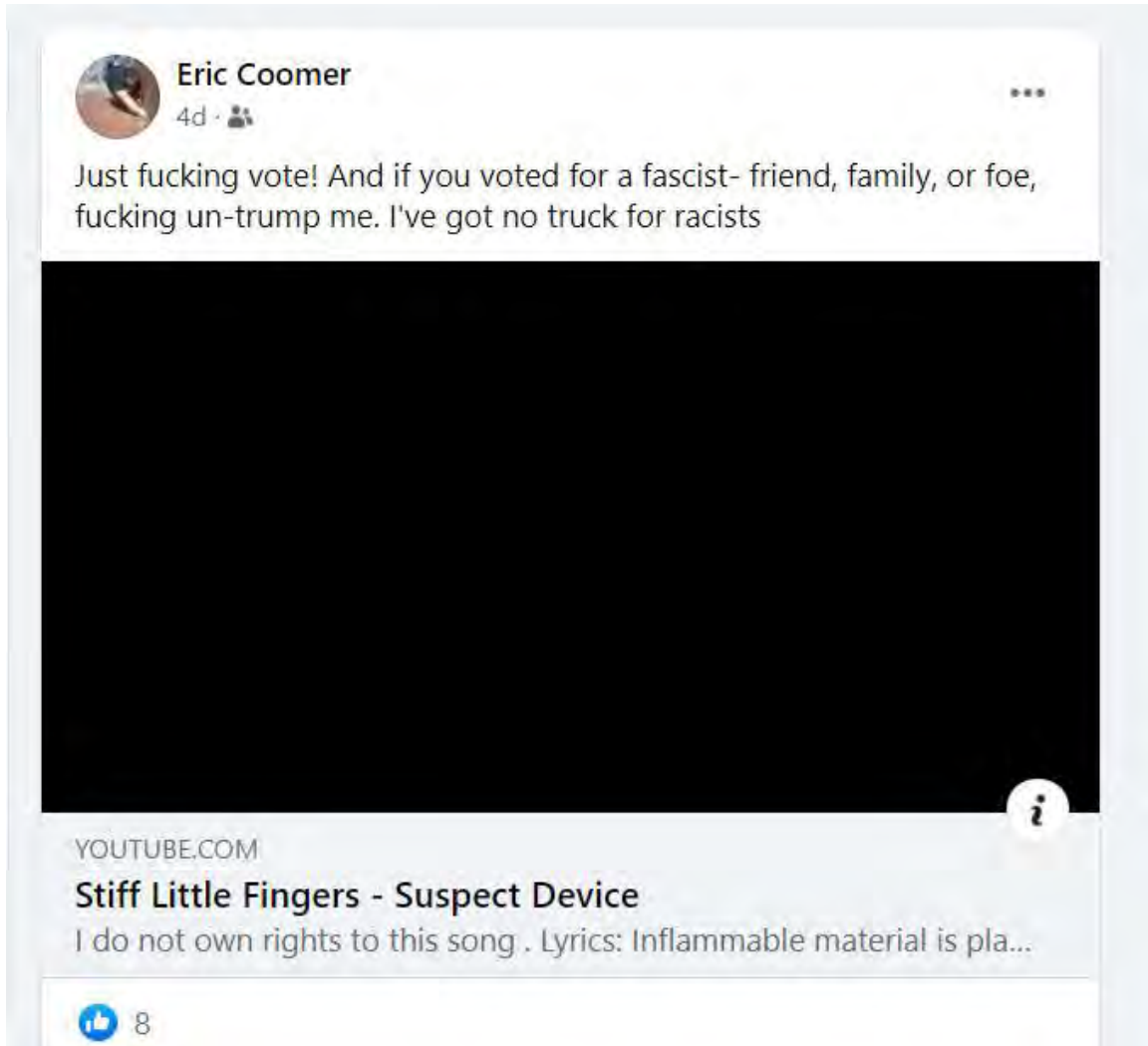
email 5 capture 1-10 please confirm receipt

5 messages

Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 1:56 PM

To: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>, Lynda McLaughlin <lynda@hannity.com>, Don Brown - Don Brown Books <donbrownbooks@gmail.com>





Eric Coomer

September 16 · 🌐

...

Well, and truly fucked #votetheassholesout



MARKETWATCH.COM

William Barr advocates hitting more protesters with federal charges — including sedition



6

2 Comments



Like



Comment



Share



Linda Axelrod
Sedition????!!

...

Like · Reply · 7w



Carl Gable

...



Like · Reply · 7w



1



Eric Coomer shared a memory,

August 14 · 🌐

...

Wheeler pass whiskey hand-ups #breckepic



6 Years Ago
See Your Memories >



Eric Coomer

August 14, 2014 · 🌐

Whiskey on my mind #breckepic



👍❤️ 11

5 Comments

👍 Like

💬 Comment

View 2 more comments



Eric Francis

Ahhh shit. I remember that. Didn't you have an epic crash soon there after? Or before. ...

Like · Reply · 11w



Eric Coomer

I wasn't riding in this epic, just doing hand-ups. The following year I raced and shattered the collar bone ...



Eric Coomer

July 6 · 🌐

...

<https://www.nbcnews.com/.../jonathan-sackler-co-owner...>

Okay, okay, it was technically June, but I found out recently, and I SOOOO love a good xmas in July... xmas in June? I dunno, fuckit. Good riddance you shitbag- I'm GLAD you're dead. I hope it was painful, but you were probably dosed to high-heaven with your own supply...



i

NBCNEWS.COM

Jonathan Sackler, co-owner of OxyContin maker Purdue Pharma, dies at 65

9

3 Comments

Like

Comment

Share



Jeremy Woolf
Good riddance

...

Like · Reply · 17w



Tyler McMahon
I wonder if he was addicted to his own opioids to manage the pain...

...

Like · Reply · 17w



Jeremy Woolf
Tyler McMahon one could only hope that's true. It would've been better if that addiction was what killed him instead of cancer though

...

Like · Reply · 17w · Edited



Eric Coomer

June 18 · 🧑🏿

...

<https://youtu.be/3tR6mKcBbT4>

required viewing



YOUTUBE.COM

8:46 - Dave Chappelle

From Dave: Normally I wouldn't show you something so unrefined,...

👍 1

👍 Like

💬 Comment

➦ Share



Eric Coomer

June 8 · 🌐



<https://www.facebook.com/65639912452/posts/10158375075202453/?d=null&vh=e>



Trevor Noah ✓

June 6 · 🌐

This! 🙌 🎥: Kimberly Jones / [David Jones MEDIA](#)



2



Eric Coomer

June 5 · 🧑🏻

...

<https://www.msn.com/.../new-trump.../ar-BB154W4q...>

#bunkerboy #bunkerbitch #fucktrump



MSN.COM

**New Trump Appointee to Foreign Aid Agency Has
Denounced Liberal Democracy and "Our Homo-Empire"**

2 Comments



Like



Comment



Share



Lynn Crouse
homo the brave

...

Like · Reply · 22w



Linda Axelrod
Well she's another Christian Right Conservative
appointee...USAID has its flaws, but she will be a disaster
to the organization. Such a shame....

...

Like · Reply · 22w



Eric Coomer

June 3 · 🧑🏻



Getting tougher for the law and order apologists every day... This is pretty much unprecedented and clear General Mattis knows the real threat to our democracy.



THEATLANTIC.COM

James Mattis Denounces President Trump, Describes Him as a Threat to the Constitution

👍👎 10

👍 Like

💬 Comment

🔗 Share



Eric Coomer

June 2 · 🌐

...

In case you didn't know:

"Antifa" has made a statement:

TO: ALL MEDIA

PUBLIC STATEMENT FROM "ANTIFA" IN RESPONSE TO THE THREATS
ISSUED BY UNITED STATES PRESIDENT DONALD J. TRUMP

Dear Mr. Trump:

Let us be perfectly clear:

"Antifa" isn't an organization. There's no membership, no meetings, no dues, no rules, no leaders, no structure. It is, literally, an idea and nothing more. Even the claim of this author to represent "Antifa" is one made unilaterally for the purposes of this communication and nothing more; there is no governing body nor trademark owner to dispute the author's right to represent "AntiFa."

"Antifa" is a neologism constructed from a contraction of the phrase "anti-fascist." The truth is, there's no such thing as being "anti-Fascist." Either you are a decent human being with a conscience, or you are a fascist.

The ostensible president of the United States has, today, openly declared that he is a fascist, and that he intends to turn the military power of the United States into a fascist tool.

Now there is no question, and we can stop pretending that this man represents anything but the worst in humanity, which his supporters embody.

And that is the only effect his words will have.

It will likely be no problem for LEO to identify the author of this document, who also has maintained the "AntiFa" page on Facebook since founding it in 2017.

The author of this document is unconcerned with that inevitability because neither that author, nor this document, has been involved in a crime of any sort in any way.

But, since both the "president" and the media insist on acting as though "AntiFa" is this big, scary organization, the author supposes it's time for "AntiFa" to make a statement.

Thus:

"AntiFa supports and defends the right of all people to live free from

Thus:

"AntiFa supports and defends the right of all people to live free from oppressive abuse of power, whether that power is unjustly derived from wealth, status as an employer, or political popularity.

Particularly, AntiFa defends and supports the right of oppressed and marginalized people to protest, march, and engage in civil disobedience in pursuit of justice. While it is never our intent to engage in violent or destructive behavior, we cannot and will not take responsibility for telling people how they are allowed to be righteously outraged. We prefer and encourage non-violent action. We also understand that some people just aren't feeling that nice anymore. Their feelings are entirely justified, and it is neither our role nor our privilege to tell them otherwise.

Mass civil disobedience is what happens when people say they're hurting and whoever's hurting them refuses to stop.

Stop hurting them. Fix your broken systems. Get real and meaningful psychological evaluations and background checks - police in some nations have to pass a more stringent test to carry pepper spray than any police department in the US, or the US military, have in place. As a direct and possibly deliberate consequence, our military and paramilitary personnel simply cannot be assumed to be fighting in the interests of the people of this country.

We've all seen the photos. This destruction and burning and looting is largely the behavior of outsiders; white people taking advantage of the situation both to enrich themselves by looting under cover of the protests; and to provide excuses for uncontrolled fascist elements within our military and police forces as plausible cover for killing more black, brown, and poor people without fear of sanction. The so-called "accelerationists" who have committed to ensuring that, any time a marginalized community stands up and demands justice, construct a narrative of criminality and destruction that white bigots and affluent oligarchs who benefit from our broken system to validate their bigotry and injustice retroactively. They are successful in this for two reasons: because people like you are easily manipulated in your banal, self-serving ignorance, and because people like you are more than happy to passively-aggressively reap the benefits of pretending to believe this destruction is the act of the oppressed.

This game has gone on for decades on an endless loop since the very dawn of the civil rights era, and we the people are saying "no more."

And that, "President" Trump, is your solution. No more. Get the dirt out of your law enforcement and your military. Get the dirt out of your government and administration. Identify racism now and take your VP

Joe Oltmann <joe@fecunited.com>
To: Chanel Rion <Chanel.Rion@oann.com>

Sun, Nov 15, 2020 at 7:11 PM

From: Joe Oltmann <joe@fecunited.com>
Date: Sunday, November 15, 2020 at 1:56 PM
To: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>, Lynda McLaughlin <lynda@hannity.com>, Don Brown - Don Brown Books <donbrownbooks@gmail.com>
Subject: email 5 capture 1-10 please confirm receipt

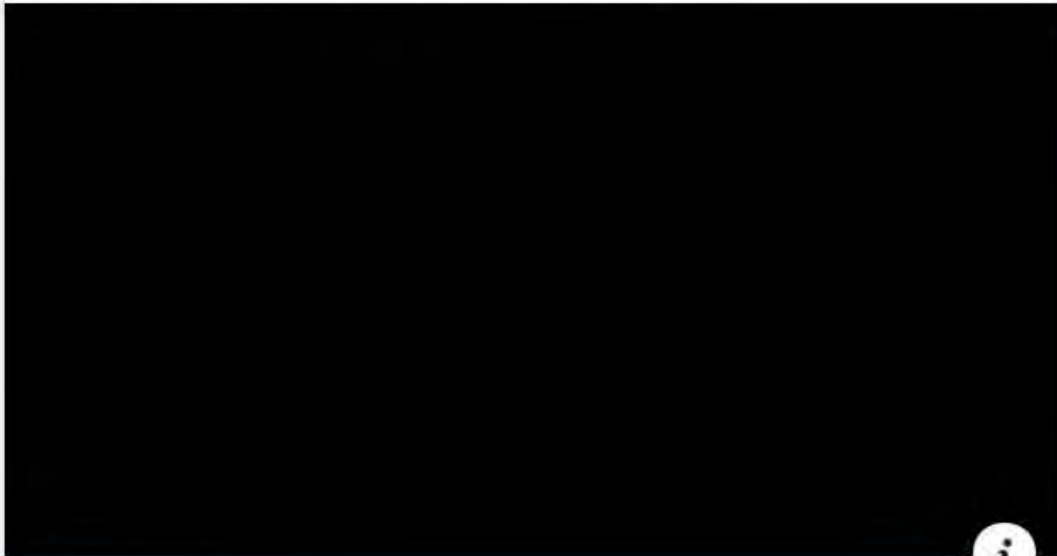


Eric Coomer

4d ·



Just fucking vote! And if you voted for a fascist- friend, family, or foe, fucking un-trump me. I've got no truck for racists



YOUTUBE.COM

Stiff Little Fingers - Suspect Device

I do not own rights to this song . Lyrics: Inflammable material is pla...



8



Eric Coomer

September 16 · 🌐

...

Well, and truly fucked #votetheassholesout



MARKETWATCH.COM

William Barr advocates hitting more protesters with federal charges — including sedition



6

2 Comments



Like



Comment



Share



Linda Axelrod
Sedition????!!

...

Like · Reply · 7w



Carl Gable

...



Like · Reply · 7w



1



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August 14 · 🌐

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Wheeler pass whiskey hand-ups #breckepic



6 Years Ago
See Your Memories >



Eric Coomer

August 14, 2014 · 🌐

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👍❤️ 11

5 Comments

👍 Like

💬 Comment

View 2 more comments



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i

NBCNEWS.COM

Jonathan Sackler, co-owner of OxyContin maker Purdue Pharma, dies at 65

9

3 Comments

Like

Comment

Share



Jeremy Woolf
Good riddance

...

Like · Reply · 17w



Tyler McMahon
I wonder if he was addicted to his own opioids to manage the pain...

...

Like · Reply · 17w



Jeremy Woolf
Tyler McMahon one could only hope that's true. It would've been better if that addiction was what killed him instead of cancer though

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Like · Reply · 17w · Edited



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June 18 · 🧑🏿

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YOUTUBE.COM

8:46 - Dave Chappelle

From Dave: Normally I wouldn't show you something so unrefined,...

👍 1

👍 Like

💬 Comment

➦ Share



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June 8 · 🌐



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Trevor Noah

June 6 · 🌐

This! 🙌 🎥: Kimberly Jones / [David Jones MEDIA](#)



2



Eric Coomer

June 5 · 🧑🏻

...

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#bunkerboy #bunkerbitch #fucktrump



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2 Comments



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Comment



Share



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James Mattis Denounces President Trump, Describes Him as a Threat to the Constitution

👍👎 10

👍 Like

💬 Comment

🔗 Share



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June 2 · 🌐

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We've all seen the photos. This destruction and burning and looting is largely the behavior of outsiders; white people taking advantage of the situation both to enrich themselves by looting under cover of the protests; and to provide excuses for uncontrolled fascist elements within our military and police forces as plausible cover for killing more black, brown, and poor people without fear of sanction. The so-called "accelerationists" who have committed to ensuring that, any time a marginalized community stands up and demands justice, construct a narrative of criminality and destruction that white bigots and affluent oligarchs who benefit from our broken system to validate their bigotry and injustice retroactively. They are successful in this for two reasons: because people like you are easily manipulated in your banal, self-serving ignorance, and because people like you are more than happy to passive-aggressively reap the benefits of pretending to believe this destruction is the act of the oppressed.

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And that, "President" Trump, is your solution. No more. Get the dirt out of your law enforcement and your military. Get the dirt out of your government and administration. Identify racism now and take your VP

Chanel Rion <Chanel.Rion@oann.com>
To: Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 7:20 PM

Confirmed receipt. Thank you!

Can we talk 11:15am EST tomorrow?

Best,

Chanel Rion

Chief White House Correspondent

One America News Network

101 Constitution Ave. NW

Washington, D.C. 20001

Office: 202-849-3391

Cell: 254-413-0035

Twitter: @ChanelRion

Chanel's Broadcasts: <https://www.youtube.com/playlist?list=PLaJp7NK1-soc9bSnbkyDLJIOckvbkC4e7>

STREAM OAN | <http://shorturl.at/jsJW5>
OAN FACEBOOK | <http://shorturl.at/yEIN6>
OAN TWITTER | <https://twitter.com/OANN>
OAN YOUTUBE | <http://shorturl.at/dhV29>

From: Joe Oltmann <joe@fecunited.com>
Sent: Sunday, November 15, 2020 9:11:17 PM
To: Chanel Rion
Subject: FW: email 5 capture 1-10 please confirm receipt

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Chanel Rion <Chanel.Rion@oann.com>

Sun, Nov 15, 2020 at 8:46 PM

Yes.

[Quoted text hidden]

Chanel Rion <Chanel.Rion@oann.com>
To: Joe Oltmann <joe@fecunited.com>

Mon, Nov 16, 2020 at 7:42 AM

Excellent! Thank you. I very much look forward to this.

My Skype address is my email: chanel.rion@oann.com

We'll keep it to 15-20 min.

This is recorded, not live - I am aiming for 4 soundbites:

1. How This Story Found You
2. Top 3 most shocking things you found when looking into Coomer... (I know we have an abundance to choose from but perhaps pick three Facebook posts and read/explain them so I can show them as b-roll in the special)
3. Coomer is not just an Antifa nerd in the basement... (title, rank, patents, education, scope/weight in company)
4. Coomer's anti-Trumpism is not an anomaly at Dominion

See you soon!

Best,

Chanel Rion

Chief White House Correspondent

One America News Network

101 Constitution Ave. NW

Washington, D.C. 20001

Office: 202-849-3391

Cell: 254-413-0035

Twitter: @ChanelRion

Chanel's Broadcasts: <https://www.youtube.com/playlist?list=PLaJp7NK1-soc9bSnbkyDLJIOckvbK4e7>

STREAM OAN | <http://shorturl.at/jsJW5>
OAN FACEBOOK | <http://shorturl.at/yEIN6>

From: Joe Oltmann <joe@fecunited.com>

Sent: Sunday, November 15, 2020 10:46:01 PM

To: Chanel Rion

[Quoted text hidden]

[Quoted text hidden]



Joe Oltmann <joe@fecunited.com>

Coomer Suit

4 messages

Chanel Rion <Chanel.Rion@oann.com>
To: "joe@fecunited.com" <joe@fecunited.com>

Sat, Dec 26, 2020 at 10:27 PM

Hi Joe,

Merry Christmas!

OAN has assembled a legal team, we're going to get a lot out of discovery. We have a lot of strategy and good news about this case.

Would you like to collaborate with us?

Let me know.

Best,
Chanel

Sent from my iPhone

Joe Oltmann <joe@fecunited.com>
To: Chanel Rion <Chanel.Rion@oann.com>

Sun, Dec 27, 2020 at 4:58 PM

Hi Chanel,

Absolutely.

Merry Christmas to you and your family. I disconnected from the world for Christmas... (

Warm regards,

Joe

[Quoted text hidden]

Chanel Rion <Chanel.Rion@oann.com>
To: Joe Oltmann <joe@fecunited.com>

Sun, Dec 27, 2020 at 9:57 PM

Wonderful!

Let me know what your best cell number is.

I'll send your contact to our team. Merry Christmas and here's to the new year!

Chanel Rion

Chief White House Correspondent

One America News Network

101 Constitution Ave. NW

Washington, D.C. 20001

Office: 202-849-3391

Cell: 254-413-0035

Twitter: @ChanelRion

Chanel's Broadcasts: <https://www.youtube.com/playlist?list=PLaJp7NK1-soc9bSnbkyDLJIOckvbK4e7>

STREAM OAN | <http://shorturl.at/jsJW5>
OAN FACEBOOK | <http://shorturl.at/yEIN6>
OAN TWITTER | <https://twitter.com/OANN>
OAN YOUTUBE | <http://shorturl.at/dhV29>

From: Joe Oltmann <joe@fecunited.com>
Sent: Sunday, December 27, 2020 6:58:54 PM
To: Chanel Rion
Subject: Re: Coomer Suit

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Chanel Rion <Chanel.Rion@oann.com>

Mon, Dec 28, 2020 at 12:16 PM

303-667-5105

Look forward to connecting.

Joe

[Quoted text hidden]

Connecting Joe Oltmann with Eric and Alvin

2 messages

Susan Pausky <susanpausky@gmail.com>

Fri, Nov 20, 2020 at 8:17 PM

To: Eric@ericmetexas.com, Joe Oltmann <Joe@fecunited.com>, Albin Sadar <asadar@snnradio.com>

Greetings Eric, Albin and Joe,

Eric, thank you for being immediately responsive to my suggestion through, Kurt Nelson, to introduce you to Joe Oltmann to interview during this epic time in our nation. You passionately asked for help pushing out the truth. Here you go! Joe shares your passion and I am giving thanks for him daily.

Joe and I became friends years ago serving in religious reconciliation circles in the Spirit of Yeshua. Another story.

Since I have communicated privately with you regarding this introduction, and since the content is so very sensitive, I would be relieved to respectfully leave this discussion in your hands to best meet the moment for your listeners and our nation.

Albin, bless you in producing during this time!

May Yah bless and keep us in the Way of Yeshua, Susan

Sent from my iPad

Albin Sadar <asadar@snnradio.com>

Tue, Nov 24, 2020 at 4:22 PM

To: Susan Pausky <susanpausky@gmail.com>, Joe Oltmann <Joe@fecunited.com>

<https://www.youtube.com/watch?v=cl9JJJaEmkSQ>



Joe Oltmann Discusses How A Security Genius at Dominion Voting Promised Antifa Members A Trump Loss - YouTube

Businessman Joe Oltmann has inside information of how a security genius at Dominion, suppliers of many of America's voting machines, assured Antifa members t...

www.youtube.com

Enjoy... and share EVERYWHERE!!

Albin

Albin Sadar
Producer
The Eric Metaxas Show

From: Susan Pausky <susanpausky@gmail.com>

Sent: Friday, November 20, 2020 10:17 PM

To: Eric@ericmetaxas.com <Eric@ericmetaxas.com>; Joe Oltmann <Joe@fecunited.com>; Albin Sadar <asadar@srnradio.com>

Subject: Connecting Joe Oltmann with Eric and Alvin

[Quoted text hidden]



Joe Oltmann <joe@fecunited.com>

Re: Connecting Joe Oltmann with Eric and Albin

22 messages

Susan Pausky <susanpausky@gmail.com>

Fri, Nov 20, 2020 at 8:22 PM

To: Eric@ericmetexas.com, Joe Oltmann <joe@fecunited.com>, Albin Sadar <asadar@snnradio.com>

Correction Albin !

Sent from my iPad

> On Nov 20, 2020, at 10:17 PM, Susan Pausky <susanpausky@gmail.com> wrote:

>

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>

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>

>

>

>

>

>

>

>

>

>

> Sent from my iPad

Eric Metaxas <eric@ericmetexas.com>

Fri, Nov 20, 2020 at 8:31 PM

To: Susan Pausky <susanpausky@gmail.com>

Cc: Joe Oltmann <joe@fecunited.com>, Albin Sadar <asadar@snnradio.com>

Susan — thanks so very much for this introduction.

And Joe we would be delighted to have you on the program early next week to talk about whatever you know and can say. I'd prefer Monday if we have an opening, but will leave that to Albin. So glad this can work out. Bless you. Eric

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Sat, Nov 21, 2020 at 10:46 AM

To: Eric Metaxas <eric@ericmetexas.com>, Susan Pausky <susanpausky@gmail.com>

Cc: Albin Sadar <asadar@snnradio.com>

Hi Eric,

Great to meet you and thank you Susan for connecting us. I will make myself available. Do you need anything from me before or a call before? I will leave the details of how to proceed in your hands.

My contact info is 303-667-5105.

Thank you again.

Warm regards,

Joe

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>

Sat, Nov 21, 2020 at 2:46 PM

To: Joe Oltmann <joe@fecunited.com>

Cc: Susan Pausky <susanpausky@gmail.com>, James Simeone <james@nycradio.com>

Hello, Joe, good to meet you!

We have time on our show calendar for a 30- to 40-min interview with Eric on Monday 11/23 at 12 noon EST. Our engineer (James) would send a Zoom invite about 10 mins ahead of the audio/video interview, which would be taped and aired either later Monday or on Tuesday.

Eric's program is heard across the country on over 300 radio stations via the Salem Radio Network -- and has a YouTube following of 155K subscribers.

Please let us know if this time/date will work for you.

With appreciation,

Albin

[Quoted text hidden]

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>

Sun, Nov 22, 2020 at 3:18 PM

To: Joe Oltmann <joe@fecunited.com>

Cc: Susan Pausky <susanpausky@gmail.com>, James Simeone <james@nycradio.com>

Hello, again, Joe... we need to change Monday's interview to **TUESDAY 11/24 at 12:30 pm EST**. Will THAT work for you?

Thanks,

Albin

Albin Sadar

Producer

The Eric Metaxas Show

From: Albin Sadar

Sent: Saturday, November 21, 2020 4:46 PM

To: Joe Oltmann <joe@fecunited.com>

Cc: Susan Pausky <susanpausky@gmail.com>; James Simeone <james@nycradio.com>

Subject: Re: Connecting Joe Oltmann with Eric and Albin

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>

Mon, Nov 23, 2020 at 11:43 AM

To: Joe Oltmann <Joe@fecunited.com>

Cc: Susan Pausky <susanpausky@gmail.com>, James Simeone <james@nycradio.com>, Chris & Tiffany Himes <chrishimes2000@gmail.com>

Hello, Joe, I need to finalize tomorrow's schedule.

Can you

- 1) confirm for tomorrow at 12:30 pm EST
- 2) email a brief bio
- 3) email a few bullet points to get the conversation with Eric rolling

Once again, this will be a 20- to 25-min interview on TAPE via ZOOM with Eric. The Zoom invite will be emailed to you about 10 mins ahead of the taping.

Thank you so much, Joe!

Albin

Albin Sadar
Producer
The Eric Metaxas Show

From: Albin Sadar <asadar@srnradio.com>

Sent: Sunday, November 22, 2020 5:18 PM

To: Joe Oltmann <Joe@fecunited.com>

[Quoted text hidden]

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Mon, Nov 23, 2020 at 12:31 PM

To: Albin Sadar <asadar@srnradio.com>

Cc: Susan Pausky <susanpausky@gmail.com>, James Simeone <james@nycradio.com>, Chris & Tiffany Himes <chrishimes2000@gmail.com>

H Albin,

I will make myself available. I am sharing with you the bio that they used for a board I sit on.

Joe Oltmann is the CEO of PIN Business Network, a technology media and data decision sciences company. He is a two time EY Entrepreneur of the Year nominee and 2020 Finalist. His companies have been recognized nationally and Joe has personally been recognized in the community for his leadership and courage is helping others and giving a hand up to businesses in need. Joe has a foundation, PIN Gives, which has been able to help fund programs in education, medicine, inner city youth programs and other important initiatives of faith and education. Joe has worked all over the

world with concentrations in Africa and the Middle East. Joe previously co-founded an organization called Trac5, an organization that worked to bridge conflict and find a common ground between Muslims, Christians and Jews globally that today works to create peace in an otherwise chaotic world. Joe is also the founder of FEC United, a politically agnostic action nonprofit that works to restore constitutional integrity of our great nation and protect and give a voice to the people and pillars of our community.

Please let me know what type of bullet points. I assume, Eric Coomer, how I came to be mixed up in all this... please clarify for me please.

Thank you again Albin.

Warm regards

Joe

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Tue, Nov 24, 2020 at 9:25 AM

To: Albin Sadar <asadar@snnradio.com>, Eric Metaxas <eric@ericmetaxas.com>

Cc: James Simeone <james@nycradio.com>, Susan Pausky <susanpausky@gmail.com>

Albin,

Enclosed are the screenshots of Eric Coomer's FB page. Thought you would want to review all of them before the interview or use them. Apologies for the delay in getting them to you. I was pheasant hunting yesterday. A much needed break. Please confirm receipt. Please tell me how we will connect.

Warm regards,

Joe

[Quoted text hidden]



Eric Coomer.zip

15286K

Susan Pausky <susanpausky@gmail.com>

Tue, Nov 24, 2020 at 9:48 AM

To: Joe Oltmann <joe@fecunited.com>

Cc: Albin Sadar <asadar@snnradio.com>, Eric Metaxas <eric@ericmetaxas.com>, James Simeone <james@nycradio.com>

Joe, yesterday's msg says James above will send zoom link about 10 mins prior.

[Quoted text hidden]

Albin Sadar <asadar@snnradio.com>

Tue, Nov 24, 2020 at 9:53 AM

20CV34319-JOdisclosures-0833

To: Susan Pausky <susanpausky@gmail.com>, Joe Oltmann <Joe@fecunited.com>
Cc: Eric Metaxas <Eric@ericmetaxas.com>, James Simeone <james@nycradio.com>

Yes... coming in 30 mins

Albin Sadar
Producer
The Eric Metaxas Show

From: Susan Pausky <susanpausky@gmail.com>
Sent: Tuesday, November 24, 2020 11:48 AM
To: Joe Oltmann <joe@fecunited.com>
Cc: Albin Sadar <asadar@srnradio.com>; Eric Metaxas <eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

[Quoted text hidden]

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>
To: Susan Pausky <susanpausky@gmail.com>, Joe Oltmann <Joe@fecunited.com>
Cc: Eric Metaxas <Eric@ericmetaxas.com>, James Simeone <james@nycradio.com>

Tue, Nov 24, 2020 at 10:13 AM

Sorry, Joe... running just a little late... Hope to start taping with you at 12:40 EST....

Albin Sadar
Producer
The Eric Metaxas Show

From: Susan Pausky <susanpausky@gmail.com>
Sent: Tuesday, November 24, 2020 11:48 AM
To: Joe Oltmann <joe@fecunited.com>
Cc: Albin Sadar <asadar@srnradio.com>; Eric Metaxas <eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

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[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Albin Sadar <asadar@srnradio.com>, Susan Pausky <susanpausky@gmail.com>
Cc: Eric Metaxas <Eric@ericmetaxas.com>, James Simeone <james@nycradio.com>

Tue, Nov 24, 2020 at 10:18 AM

NP. Standing by.

[Quoted text hidden]

Susan Pausky <susanpausky@gmail.com>
To: Joe Oltmann <joe@fecunited.com>

Tue, Nov 24, 2020 at 10:23 AM

Be bold. Eric shares passion. Epic for all to shove away obstacles to saving republic

[Quoted text hidden]

James Simeone <james@nycradio.com>

Tue, Nov 24, 2020 at 10:25 AM

To: Joe Oltmann <joe@fecunited.com>, Albin Sadar <asadar@srnradio.com>, Susan Pausky <susanpausky@gmail.com>

Cc: Eric Metaxas <Eric@ericmetaxas.com>

<https://zoom.us/j/97728125801>

Join our Cloud HD Video Meeting

Zoom is the leader in modern enterprise video communications, with an easy, reliable cloud platform for video and audio conferencing, chat, and webinars across mobile, desktop, and room systems. Zoom Rooms is the original software-based conference room solution used around the world in board, conference, huddle, and training rooms, as well as executive offices and classrooms. Founded in 2011, Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Zoom is a publicly traded company headquartered

zoom.us

From: Joe Oltmann <joe@fecunited.com>

Sent: Tuesday, November 24, 2020 12:18 PM

To: Albin Sadar <asadar@srnradio.com>; Susan Pausky <susanpausky@gmail.com>

Cc: Eric Metaxas <Eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

[Quoted text hidden]

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>

Tue, Nov 24, 2020 at 10:25 AM

To: Joe Oltmann <joe@fecunited.com>, Susan Pausky <susanpausky@gmail.com>

Cc: Eric Metaxas <eric@ericmetaxas.com>, James Simeone <james@nycradio.com>

Ready now...

Albin Sadar

Producer

The Eric Metaxas Show

From: Joe Oltmann <joe@fecunited.com>

Sent: Tuesday, November 24, 2020 12:18 PM

To: Albin Sadar <asadar@srnradio.com>; Susan Pausky <susanpausky@gmail.com>

Cc: Eric Metaxas <Eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

[Quoted text hidden]

[Quoted text hidden]

Albin Sadar <asadar@srnradio.com>

Tue, Nov 24, 2020 at 10:26 AM

To: Joe Oltmann <joe@fecunited.com>, Susan Pausky <susanpausky@gmail.com>

Cc: James Simeone <james@nycradio.com>

Can I get a high rez photo, please?

Thanks!

Albin Sadar
Producer
The Eric Metaxas Show

From: Albin Sadar <asadar@snnradio.com>
Sent: Tuesday, November 24, 2020 12:25 PM
To: Joe Oltmann <joe@fecunited.com>; Susan Pausky <susanpausky@gmail.com>
Cc: Eric Metaxas <eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

[Quoted text hidden]

[Quoted text hidden]

Albin Sadar <asadar@snnradio.com>
To: Joe Oltmann <joe@fecunited.com>, Susan Pausky <susanpausky@gmail.com>
Cc: James Simeone <james@nycradio.com>

Tue, Nov 24, 2020 at 10:35 AM

We need to begin the interview, please...

Thanks so much!

Albin

Albin Sadar
Producer
The Eric Metaxas Show

From: Albin Sadar <asadar@snnradio.com>
Sent: Tuesday, November 24, 2020 12:25 PM
To: Joe Oltmann <joe@fecunited.com>; Susan Pausky <susanpausky@gmail.com>
Cc: Eric Metaxas <eric@ericmetaxas.com>; James Simeone <james@nycradio.com>

[Quoted text hidden]

[Quoted text hidden]

Eric Metaxas <eric@ericmetaxas.com>
To: Joe Oltmann <joe@fecunited.com>
Cc: Albin Sadar <asadar@snnradio.com>, Susan Pausky <susanpausky@gmail.com>

Tue, Nov 24, 2020 at 12:03 PM

Joe — what a sincere blessing and encouragement it was to speak with you today, my brother. You cannot imagine what it means to know that folks like you are out there being used by God as you are. I'm so excited we will get my interview with you blasted out to everyone today. And of course tonight at 6PM Mountain Time I'll be participating in a FB Live National Global Prayer Meeting to which you and anyone else is invited. <https://www.facebook.com/events/396710538143208/> Please spread the word if you can and hope to stay in touch. Eric

[Quoted text hidden]

[Quoted text hidden]

<Eric.Coomer.zip>

Joe Oltmann <joe@fecunited.com>

Tue, Nov 24, 2020 at 8:46 PM

To: Eric Metaxas <eric@ericmetaxas.com>

Cc: Albin Sadar <asadar@srnradio.com>, Susan Pausky <susanpausky@gmail.com>

Eric,

Thank you for the opportunity to share this information. I believe that God is at the wheel but we must do our part and stand up with courage. I spent a couple hours watching a few of your videos. You are going to be one of my favorite people to follow. Your passion is infectious.

I missed the prayer meeting tonight because of all these meetings and discussions. Things are heating up. I will share in the future.

Blessings my friend.

Joe

From: Eric Metaxas <eric@ericmetaxas.com>

Date: Tuesday, November 24, 2020 at 12:03 PM

To: Joe Oltmann <Joe@fecunited.com>

[Quoted text hidden]

[Quoted text hidden]

Eric Metaxas <eric@ericmetaxas.com>

Wed, Nov 25, 2020 at 6:55 AM

To: Joe Oltmann <Joe@fecunited.com>

Cc: Albin Sadar <asadar@srnradio.com>, Susan Pausky <susanpausky@gmail.com>

Joe — Thanks so much for your kind words. I have no doubt that the Lord has raised you and me up for such a time as this. And that He will lead us and guide us through it. I'm so grateful to Susan for connecting us and of course whenever there is ANYTHING you'd like to share on my program, that's why the Lord gave me the program. I find it fascinating that Lin Wood is a VERY outspoken Christian and isn't shy in tweeting about it. No wonder Chris Christie thinks they're all nuts. I'm amazed Guiliani can work with him. But imagine that Jenna Ellis and Sidney and Lin are all STRONG believers. Staggering stuff. To be continued, brother! If you have anything you want to talk about email me and we can get you on any time next week, of course. We weren't planning any new shows tomorrow or Friday, but I'll have my mic with me and we CAN do a show Friday if you have any MAN WALKS ON MOON kind of headline info. Blessings. Eric

[Quoted text hidden]

Susan Pausky <susanpausky@gmail.com>

Wed, Nov 25, 2020 at 7:27 AM

To: Eric Metaxas <eric@ericmetaxas.com>

Cc: Joe Oltmann <Joe@fecunited.com>, Albin Sadar <asadar@srnradio.com>

Eric and Joe and team! Thank you so much for trusting in this introduction. I am so grateful for both of you! Bless our

brother Kurt Nelson and his life work and brotherhood with Eric for putting my request through personally and immediately.

Praying the message will mainstream and crash through to citizens of both political parties as it's our votes and ballots that are being grabbed and gamed by others in the dark to choose elected officials.

Eric, you are poised based on your understanding of history to speak of this in terms that may break through to political liberals. No one is crash's through that iron dome yet.

I am praying Yeshua will give you access to moderate and liberals, to mainstream the threat to republic. Perhaps, based on your Bonhoeffer and Wilberforce knowledge you could break through to a liberal top media influencer for a debate of sorts.

Priority is urgency of winning election. Also, penetrating liberals who are not comprehending threat now. Praying they will choose an off ramp as the hammer may be coming down to shock their senses about election interference by those who don't care about liberals and more than conservatives.

I'll say it. This may be equivalent of voter ballot rape.

Also praying serious investigative journalist will pick up on Dominion, Antifa intersection and Twitter suppression related to Joe's experience!

Happy Daughter of the King Warrior! Susan

Please forgive typos and predictive text errorsSent from my iPhone

On Nov 25, 2020, at 8:55 AM, Eric Metaxas <eric@ericmetaxas.com> wrote:

Joe — Thanks so much for your kind words. I have no doubt that the Lord has raised you and me up for such a time as this. And that He will lead us and guide us through it. I'm so grateful to Susan for connecting us and of course whenever there is ANYTHING you'd like to share on my program, that's why the Lord gave me the program. I find it fascinating that Lin Wood is a VERY outspoken Christian and isn't shy in tweeting about it. No wonder Chris Christie thinks they're all nuts. I'm amazed Giuliani can work with him. But imagine that Jenna Ellis and Sidney and Lin are all STRONG believers. Staggering stuff. To be continued, brother! If you have anything you want to talk about email me and we can get you on any time next week, of course. We weren't planning any new shows tomorrow or Friday, but I'll have my mic with me and we CAN do a show Friday if you have any MAN WALKS ON MOON kind of headline info. Blessings. Eric

[Quoted text hidden]

Susan Pausky <susanpausky@gmail.com>

Wed, Nov 25, 2020 at 7:34 AM

To: Eric Metaxas <eric@ericmetaxas.com>

Cc: Albin Sadar <asadar@srrradio.com>, Joe Oltmann <Joe@fecunited.com>

Bless entire team! You are rocking it! 🙏

[Quoted text hidden]



Joe Oltmann <joe@fecunited.com>

The dominion machines, cracked

1 message

Joe Oltmann <joe@fecunited.com>
To: Eric Metaxas <eric@ericmetaxas.com>

Tue, May 4, 2021 at 11:56 AM

<https://www.depernolaw.com/dominion.html>

Eric,

I think you have probably already seen this but wanted to share it with you anyway. Matt DePerno has been working with an election expert and cracked the Dominion Voting Systems wide open. They know how the fraud was created and it aligns with everything I have said and.... Would have been overseen by Eric Coomer, if security is what he does.

As a side note. Newsmax never reached out to me for any evidence. They made a statement that they could not find any evidence... they never looked. The idea they would settle for an apology in an effort to make me look bad, is embarrassing. I can unequivocally state, I spoke the truth, I had nothing to gain from speaking the truth, and based on what happened to me and my family this Saturday, I do not see the end in sight as a result of standing up. Pictures enclosed. I had Hazmat, the FBI and the Sheriff's office at my house Saturday night. Scared my wife and daughter, which is what they wanted, I suppose.

I pray you are well.

Warm regards,

Joe Oltmann



Chairman

e: joe@fecunited.com

p: [303.502.5646](tel:303.502.5646)

w: fecunited.com


3 attachments



IMG_2423.heic
421K



IMG_2421.HEIC
568K

 **IMG_2416.mov**
2271K



Joe Oltmann <joe@fecunited.com>

Affidavit

3 messages

Joe Oltmann <joe@fecunited.com>
To: "sidney@federalappeals.com" <sidney@federalappeals.com>
Cc: Randy Corporon <rbc@corporonlaw.com>

Thu, Nov 19, 2020 at 9:24 AM

Sidney,

Enclosed is the affidavit that I signed on Friday. I will send a couple other emails with the screenshots of Eric Coomer's Facebook pages and the information we have from Mongolia. I cc'ed Randy Corporon who is assisting me in all this.

Appreciate all that you are doing. Thank you Sidney.

Warm regards,

Joe Oltmann

 **Joseph Oltmann Affidavit.pdf**
2940K

Sidney Powell <sidney@federalappeals.com>
To: Joe Oltmann <joe@fecunited.com>
Cc: Randy Corporon <rbc@corporonlaw.com>

Thu, Nov 19, 2020 at 9:49 AM

Thank you. Press conference shortly

Sidney Powell
www.SidneyPowell.com
Federal appellate attorney and author of LICENSED TO LIE & co-author of CONVICTION MACHINE

[Quoted text hidden]

Randy Corporon <rbc@corporonlaw.com>
To: Sidney Powell <sidney@federalappeals.com>
Cc: Joe Oltmann <joe@fecunited.com>

Thu, Nov 19, 2020 at 9:57 AM

On the RNC prayer call then. But will watch recording after.

Sam meeting with our dominion lady along with a second lawyer at my office as we speak.

God speed.

Sent from my iPhone. Plz overlook typo or dictating spell errors.

On Nov 19, 2020, at 9:49 AM, Sidney Powell <sidney@federalappeals.com> wrote:

[Quoted text hidden]

STATE OF COLORADO)
County of Douglas)ss.

COMES NOW, Affiant Joseph T. Oltmann, being first duly sworn, under oath, and states under penalty of perjury that the following information is true and accurate within his personal knowledge and belief:

My name Joseph Oltmann. I am over eighteen years of age. I am not suffering under any mental disability and am competent to give this sworn affidavit. I am able to read and write and to give this affidavit voluntarily and on my own free will and accord. No one has used any threats, force, pressure, or intimidation to make me sign this affidavit. I make this affidavit in support of the truth.

I am the CEO of a tech company based just outside of Denver, Colorado. I am also the founder of an organization called FEC United. [[Fecunited.com](https://fecunited.com)] The goal of this organization is to restore constitutional integrity to our community and empower those in our community to stand up to state and national leadership that intends to suppress the rights of individuals holistically.

Through this organization "FEC" I became a target of journalists who began to slander both me and my organization. I became the topic of Antifa and extremists through my involvement in a movement to resist the narrative that police are bad and our society represented the rhetoric shared by these extremists. As a result of these attacks, I started researching Antifa, BLM, Inc. and their connection to violence and unrest inside of our communities. As a result, I set out to infiltrate Antifa meetings and de-mask those Antifa members who are journalists in the mainstream media in Colorado specifically.

On or about the week of September 27, 2020, I was able to attend an Antifa meeting which appeared to be between Antifa members in Colorado Springs and in Denver Colorado. I cannot verify the connection between the two or the leadership as they were disorganized. Discussions of Our Revolution and Antifa were discussed. Rhetoric of "eliminating fascists" and frustration as to the dwindling of support to rally in the street was evident.

Then I honed in among other conversations key actors in the organization who work for local and state news publications. One such person of interest was Heidi Beedle, identified leader of Our Revolution in El Paso County (Southern Colorado) and Antifa leader of the same area.

Heidi's name is actually Sean Beedle. She is a journalist at Colorado Springs Independent, Colorado Springs Business Journal and a freelance writer for several online publications. Others to remain unnamed in this were present.

The conversation went like this:

Someone identified as "Eric" began to speak. Someone asked who Eric was, and someone else replied "he is the Dominion guy" [paraphrased].

Eric then began to speak after being told to continue, but was interrupted and asked by someone, "What are we going to do if Trump wins this fucking election?"

Eric responded, "Don't worry about the election. Trump is not going to win. I made fucking sure of that.. Hahaha"

Someone responded, "Fucking right."

Eric continued with fortifying the groups and recruiting. I would describe his tone as eccentric and boisterous. I wrote down his name and started to do some research into him.

At the time, I thought that they were so disconnected with reality that they think they can "make sure Trump is not elected."

I started with a simple google search: Keywords: "Eric," "Dominion," "Denver Colorado." The fifth result in organic search returned:

[Dominion Voting Systems | Employee Profiles, Emails, Mutual ...](#)

www.leadcandy.io › company › Dominion-Voting-Syst...

Find people working at Dominion Voting Systems. LeadCandy provides Full ... Denver, Colorado. VIEW FULL PROFILE ... FULL PROFILE. Eric Coomer's photo ...

Above that were results for Eric Schussler- Old Dominion University and Eric E Johnson, Attorney - Sherman & Howard. The first two on organic search however was as follows:

[Dominion - Colorado Secretary of State](#)

www.sos.state.co.us › elections › files › projectPlans
PDF

Sep 9, 2016 — our most recent pilots in the City and County of Denver and Mesa County.
... 1 Democracy Suite is a registered trademark of Dominion Voting Systems. ... Eric
Coomer graduated from the University of California, Berkeley in ...

And

[Eric Coomer's email & phone | Dominion Voting Systems's ...](#)

rocketreach.co › eric-coomer-email_7112825

Location, Denver, Colorado, United States. Work, Director, Market Strategy @ Dominion
Voting Systems Member, Board of Directors @ Friends of Levitt Pavilion ...

I began doing research on Eric Coomer and discovered that Colorado Secretary of state
link the following about Dr. Eric Coomer on page 26:

"Eric Coomer graduated from the University of California, Berkeley in 1997 with a Ph.D. in Nuclear Physics. After working in IT consulting for several years, Eric entered the elections industry in 2005 with Sequoia Voting Systems as Chief Software Architect. After three years with the company, Eric took over all development operations as Vice President of Engineering. When Sequoia was acquired by Dominion Voting Systems in 2010, Eric joined the DVS team as Vice President of US Engineering overseeing development in the Denver, Colorado office.

Recently, Eric has taken over as the Director of Product Strategy driving the creation of next generation products through close collaboration with customers, combined with a deep understanding of technology and the needs of Elections departments throughout the United States and abroad. Eric has been an active participant in the development of the IEEE common data format for Elections systems, as well as the working group for developing standards for Risk-Limiting Audits for elections results. When not designing new products, Eric supports large and small scale customers during Election season."

I did some cursory research on Eric, but my conclusion was that he was either a part of the government or not relevant to the conversation. In other words, this was not a target I would

identify as being influential in Antifa. My conclusion was based on his credentials of having a PhD in Nuclear Physics. Did not add up for someone with that intelligence. I set it aside and concentrated my focus on the activist journalist who were actually Antifa members.

On October 15, 2020 I spoke at an FEC meeting in Bandimere Speedway. It was a rally around the unconstitutional actions of Jefferson County, Colorado government leadership to hurt Bandimere Speedway. I spoke and before the event started they escorted a suspected Antifa Journalist Erik Maulbetsch [Colorado Recorder] off the premises. In that meeting I talked about outing activist journalists who were Antifa and holding them accountable in our community for attacking organizations like FEC United that serve the community.

These activist journalists frequently slander people of faith, conservatives and call them names that defame them in the community. I had enough and warned that we would call them out by name. Maulbetsch wrote an article reflecting this as he was listening in online and decided to omit details about the meeting, causing the entire journalistic community to wonder if they were on the list. It had a positive effect contrary to their intentions.

On Friday November 6th, I received a forwarded article about Georgia irregularities on the election day. I normally do not read many of these articles because I am inundated with information both from FEC, and my company. I started reading it and noticed Eric Coomer was the spokesperson for a company called Dominion Voting Systems. I immediately stopped and started to go back through my notes to find the info on Eric Coomer. I then started research Dominion Voting Systems. The information became rather scary as everywhere I looked I found Eric's name. Some listing him as VP of Security and others calling him Director of Strategy and Security. I began my search for everything Eric Coomer, Dr. Eric Coomer and any information related to legal filings, RFPs, states using Dominion, Colorado uses and even areas in Colorado that do not use Dominion.

I then turned my attention to Eric Coomer's Facebook profile and page while I gathered information on correlating email addresses, profiles, screen names, etc. Searching Twitter, Reddit, Facebook, 4Chan, etc etc.

I was able to get screenshots of Eric Coomer's Facebook posts going back to 2016. What I discovered was disturbing. Anti-Trump rhetoric, posts referring to: Fuck USA, Fuck the Police, A.C.A.B., posts that were anti Conservative, and even posts being happy someone died. Then the bigger shocker. He reposted the Antifa "Manifesto" letter to Donald Trump. I knew that I had the right guy and someone that was clearly mentally unstable and radical. I started digging into the

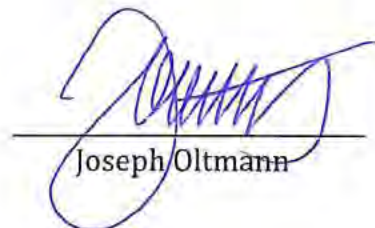
code irregularities and tying all of the pieces together with the irregularities and the Dominion uses in the disputed states. The correlation was astonishing. I then found the information related to justifying voting machines being online and his justification that they had "hardware and IP address protection". This statement by itself is FALSE.

I then attempted to reach out to all sources to bring this information to light. Calling major news stations and attempting to connect with the DOJ.

I took the information to the listeners of an organization that I also own called Conservative Daily. We have a podcast that we do on weekdays. I felt I had enough information and was confident that the Eric on the conference call was the same Eric Coomer that worked for Dominion. I was also confident that given the Facebook and other information I was able to collect that Eric Coomer was interfering with the election and as he admits in one of his posts that people at his company think and feel the same way he does. I began to research his patents, who owns them, the pattern of states they acquired as clients.

I began to research the connection to Diane Feinstein, her husband, campaign manager, Clinton Foundation and became worried that the finger of radicals had taken away the voice of the American people in deciding the election. I used ARIMA analysis to show me trends on data and probability models to prove that they were in fact using code and technology to ghost votes, switch votes or even remove probable ballots completely. Code is random unless it is not. Since we are a data company and understand artificial intelligence and use of neural networks, we understand the capabilities of creating chaos in outcome based on weighted density of probable voters.

These statements are true and accurate to the best of my knowledge.



Joseph Oltmann

STATE OF COLORADO
COUNTY OF Douglas

Personally appeared before me, LYNN KIEFFER, a Notary Public in and for the aforesaid State and County, JOSEPH T OLTMANN, the within named bargainer, with whom I am personally acquainted and who, after being duly sworn, acknowledged that she executed the foregoing Agreement for the purposes contained therein.



JOSEPH T OLTMANN

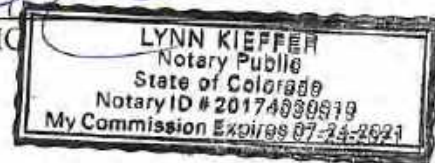
Sworn to and subscribed before me this 17th day of November, 2020.

My Commission Expires:

07-24-2021



NOTARY PUBLIC





Joe Oltmann <joe@fecunited.com>

mongolia connections

Joe Oltmann <joe@fecunited.com>

Thu, Nov 19, 2020 at 11:42 AM

To: "sidney@federalappeals.com" <sidney@federalappeals.com>

Cc: Randy Corporon <rbc@corporonlaw.com>

Sidney,

This is the screenshots of Eric Coomer in Mongolia in 2012. He was showing them how to use the machines and signing contracts. They had massive issues (Mongolian officials words not mine) in the 2012 election. They had other issues in 2017 and again in 2020. Frankly from a source that I have not verified at all, they stated that they had issues with every election and are walking away from Dominion. They also said something about funding from a source such as the IMF or some other global organization. That may or may not be important but what is important is that Eric Coomer's fingerprints are in every state, and seemingly every nation that Dominion is in for voting.

Please confirm receipt.

Warm regards,

Joe

From: Joe Oltmann <joe@fecunited.com>

Date: Monday, November 16, 2020 at 1:58 PM

To: Don Brown - Don Brown Books <donbrownbooks@gmail.com>, Lynda McLaughlin <lynda@hannity.com>, Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Cc: Randy Corporon <rbc@corporonlaw.com>

Subject: FW: mongolia connections

These links are from Mongolia. These pictures attached are from Eric while he was in Mongolia meeting with the leadership there. I think you should have the conversation with them as well.

[Quoted text hidden]

5 attachments



Screenshot_20201109-133400_Facebook.jpg
561K



Screenshot_20201109-133355_Facebook.jpg
634K



Screenshot_20201109-133345_Facebook.jpg
607K



Screenshot_20201109-133405_Facebook.jpg
539K



Screenshot_20201109-133420_Facebook.jpg
680K













Joe Oltmann <joe@fecunited.com>

mongolia connections

Sidney Powell <sidney@federalappeals.com>

To: Joe Oltmann <joe@fecunited.com>

Cc: Randy Corporon <rbc@corporonlaw.com>

Thu, Nov 19, 2020 at 12:22 PM

Got it

[Quoted text hidden]



Important: Joe Oltmann Recording Coomer

6 messages

Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Thu, Nov 26, 2020 at 7:27 AM

To: Sidney Powell <Sidney@federalappeals.com>

Cc: Don Brown - Don Brown Books <donbrownbooks@gmail.com>, Joe@fecunited.com

Hey Sidney- I copied Joe here. He does not have a recording of Coomer and never said he does, but the filing seems to suggest otherwise. Is it possible to revise? He already has people asking him for the recording.

Also, are you still working with Charles Faddis? He was in touch with Joe but he wants to make sure he should still be talking with him.

Best,
Lauren

Don Brown - Don Brown Books <donbrownbooks@gmail.com>

Thu, Nov 26, 2020 at 7:46 AM

To: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Cc: Sidney Powell <Sidney@federalappeals.com>, Joe Oltmann <Joe@fecunited.com>, Don Brown <brownandassociatespllc@gmail.com>

Lauren,

Just talked to Sidney, and I spoke to Joe about this issue a couple of days ago. Unfortunately, with everything else floating around, I wasn't able to get to Sidney on that point soon enough. My bad.

Don't worry Joe, that can still get cleared up.

I know they just filed in Michigan and Georgia late last night, and we are hunting for new local counsel in Michigan. May be possible to amend when new counsel is added to reflect that as a communications misunderstanding.

One thing Joe does have, though.. Tons of Coomer FB posts, which he's supplied to me and I've organized and forwarded to Sidney in memo form.

Thank you Joe for everything. You are a brave man, which makes you a patriot and a hero.

Happy Thanksgiving to all,

Don

<http://www.donbrownbooks.com>

[https://en.wikipedia.org/wiki/Don_Brown_\(author\)](https://en.wikipedia.org/wiki/Don_Brown_(author))

Fox News OPEDs <https://www.foxnews.com/person/b/don-brown>

Twitter: <https://twitter.com/donbrownbooks>

FB fanpage: <https://www.facebook.com/donbrownbooks/>

#LastFighterPilot <https://goo.gl/xctXDP>

#RememberExtortion17 <https://goo.gl/PABx2i>

Amazon Author Page: <https://www.amazon.com/Don-Brown/e/B001IODL9E>

New York Post Author Page: <http://nypost.com/author/don-brown/>

[Quoted text hidden]

Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Thu, Nov 26, 2020 at 9:28 AM

To: Don Brown - Don Brown Books <donbrownbooks@gmail.com>

Cc: Don Brown <brownandassociatespllc@gmail.com>, Joe Oltmann <Joe@fecunited.com>, Sidney Powell <Sidney@federalappeals.com>

Thanks Don- Also it says Joe is a reporter, which he is not.

[Quoted text hidden]

Sidney Powell <sidney@federalappeals.com>

Thu, Nov 26, 2020 at 9:56 AM

To: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Cc: Don Brown - Don Brown Books <donbrownbooks@gmail.com>, Joe Oltmann <joe@fecunited.com>

No as to Faddis. Yes I too understood he had a recording. Will correct.

Sidney Powell

www.SidneyPowell.com

Federal appellate attorney and author of LICENSED TO LIE & co-author of CONVICTION MACHINE

[Quoted text hidden]

Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Thu, Nov 26, 2020 at 10:01 AM

To: Sidney Powell <sidney@federalappeals.com>

Cc: Don Brown - Don Brown Books <donbrownbooks@gmail.com>, Joe Oltmann <joe@fecunited.com>

Thank you. And joe is not a reporter, which it states as well.

How should he handle when people/media ask him about the recording?

[Quoted text hidden]

Sidney Powell <sidney@federalappeals.com>

Thu, Nov 26, 2020 at 10:05 AM

To: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>

Cc: Don Brown - Don Brown Books <donbrownbooks@gmail.com>, Joe Oltmann <joe@fecunited.com>

Tell them a misunderstanding and pleading will be corrected

[Quoted text hidden]

[Quoted text hidden]

Re: Important: Joe Oltmann Recording Coomer. URGENT

2 messages

Sidney Powell <sidney@federalappeals.com>

Thu, Nov 26, 2020 at 9:54 AM

To: Don Brown - Don Brown Books <donbrownbooks@gmail.com>

Cc: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>, Joe Oltmann <joe@fecunited.com>, Don Brown <brownandassociatespllc@gmail.com>

Dear All, we had a format disaster upon filing that caused all the errors you see. Need good local counsel immediately and will amend in multiple ways on Friday.

Sidney Powell

www.SidneyPowell.com

Federal appellate attorney and author of LICENSED TO LIE & co-author of CONVICTION MACHINE

On Thu, Nov 26, 2020, 9:47 AM Don Brown - Don Brown Books <donbrownbooks@gmail.com> wrote:

Lauren,

Just talked to Sidney, and I spoke to Joe about this issue a couple of days ago. Unfortunately, with everything else floating around, I wasn't able to get to Sidney on that point soon enough. My bad.

Don't worry Joe, that can still get cleared up.

I know they just filed in Michigan and Georgia late last night, and we are hunting for new local counsel in Michigan. May be possible to amend when new counsel is added to reflect that as a communications misunderstanding.

One thing Joe does have, though.. Tons of Coomer FB posts, which he's supplied to me and I've organized and forwarded to Sidney in memo form.

Thank you Joe for everything. You are a brave man, which makes you a patriot and a hero.

Happy Thanksgiving to all,

Don

<http://www.donbrownbooks.com>

[https://en.wikipedia.org/wiki/Don_Brown_\(author\)](https://en.wikipedia.org/wiki/Don_Brown_(author))

Fox News OPEDs <https://www.foxnews.com/person/b/don-brown>

Twitter: <https://twitter.com/donbrownbooks>

FB fanpage: <https://www.facebook.com/donbrownbooks/>

#LastFighterPilot <https://goo.gl/xctXDP>

#RememberExtortion17 <https://goo.gl/PABx2i>

Amazon Author Page: <https://www.amazon.com/Don-Brown/e/B001IODL9E>

New York Post Author Page: <http://nypost.com/author/don-brown/>

On Thu, Nov 26, 2020 at 9:27 AM Lauren McLaughlin <lauren.mclaughlin117@gmail.com> wrote:

Hey Sidney- I copied Joe here. He does not have a recording of Coomer and never said he does, but the filing seems to suggest otherwise. Is it possible to revise? He already has people asking him for the recording.

Also, are you still working with Charles Faddis? He was in touch with Joe but he wants to make sure he should still be talking with him.

Best,
Lauren

Don Brown - Don Brown Books <donbrownbooks@gmail.com>

Thu, Nov 26, 2020 at 10:38 AM

To: Sidney Powell <sidney@federalappeals.com>

Cc: Lauren McLaughlin <lauren.mclaughlin117@gmail.com>, Joe Oltmann <joe@fecunited.com>, Don Brown <brownandassociatespllc@gmail.com>

Sidney, I've reached out to local counsel in Michigan this morning that may be a better fit. but haven't heard back yet.

Hopefully later in the day.

TNX

Don

<http://www.donbrownbooks.com>

[https://en.wikipedia.org/wiki/Don_Brown_\(author\)](https://en.wikipedia.org/wiki/Don_Brown_(author))

Fox News OPEDs <https://www.foxnews.com/person/b/don-brown>

Twitter: <https://twitter.com/donbrownbooks>

FB fanpage: <https://www.facebook.com/donbrownbooks/>

#LastFighterPilot <https://goo.gl/xctXDP>

#RememberExtortion17 <https://goo.gl/PABx2i>

Amazon Author Page: <https://www.amazon.com/Don-Brown/e/B001IODL9E>

New York Post Author Page: <http://nypost.com/author/don-brown/>

[Quoted text hidden]



Arizona hearing tomorrow - I'm on Sidney Powell's team

7 messages

Juli Haller <HallerJulia@outlook.com>

Wed, Dec 9, 2020 at 3:07 PM

To: "joe@fecunited.com" <joe@fecunited.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Joe, I work with Sidney Powell and our team on litigation regarding the election. Abbie and Howard are on the team as well. We have a case in AZ where we have a evidentiary hearing tomorrow via zoom at 11:15 Eastern time. It's technically not confirmed, but we need to prepare.

You gave us a strong affidavit but we would need to call you re Eric Coomer's admission on the phone you talked about. I don't think we'd need more than 10 minutes in court with you (via zoom) and we anticipate that any questions from defendants will be limited due to time constraints.

Can you be available? It would be fundamental predicate in the case to motive and opportunity- to support the wide spread fraud our other witnesses and experts can show...

Thanks! My cell is (202) 352-2615.

Best,

Julia Haller

Joe Oltmann <joe@fecunited.com>

Wed, Dec 9, 2020 at 3:35 PM

To: Juli Haller <HallerJulia@outlook.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Julia,

I am available tomorrow but will need some verification of who you are. My apologies for having a bit of apprehension but I have been approached by numerous people who were not who they said they were... I am currently home with COVID so fairly open as I am under quarantine.

Warm regards,

Joe

[Quoted text hidden]

Juli Haller <HallerJulia@outlook.com>

Wed, Dec 9, 2020 at 4:17 PM

To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Joe, I'm sorry to hear you have COVID! I hope you have meds! I'm adding Sidney Powell to the email, she may not be immediately available. I argued the motion hearing yesterday for Sidney and our team in Arizona case that we filed, which you can probably see in the case in U.S. District Court for the District of Arizona, Boyer, et al. v. Doug Ducey, in his official capacity, et al. 20-cv-02321-DJH.

And if you're available by zoom, we're grateful, because if this goes forward, you're important to the motive and opportunity to the fraud we can show through others. Please send you're phone # if you're comfortable, and we will send you zoom info for the call in and it starts at 11:15 EST time, so you'd probably be on standby from that point for

about an hour or so.

Best,

Juli

Julia Haller

Cell (202) 352-2615

[Quoted text hidden]

Juli Haller <HallerJulia@outlook.com>

Wed, Dec 9, 2020 at 4:19 PM

To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

And let me just add that we're grateful to you for your availability!

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Wed, Dec 9, 2020 at 4:25 PM

To: Juli Haller <HallerJulia@outlook.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Juli,

I am good. My number is 303-667-5105. Let me know if you want to connect before hand. I am walking away from the computer at the moment but will have my phone with me.

Warm regards,

Joe

[Quoted text hidden]

Juli Haller <HallerJulia@outlook.com>

Wed, Dec 9, 2020 at 4:30 PM

To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Joe, great, thanks! I'll call you soon, but busy with another witness.

[Quoted text hidden]

Juli Haller <HallerJulia@outlook.com>

Wed, Dec 9, 2020 at 4:55 PM

To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Abbie Frye <abbie@kraken-wood.com>, Howard Kleinhendler <howard@kleinhendler.com>

Hi Joe, I'm sorry to do this to you, but the case just got dismissed before the hearing, so now no hearing tomorrow morning!

I hope you feel better and I'm grateful for your availability despite COVID!

[Quoted text hidden]



Joe Oltmann <joe@fecunited.com>

Catching up.

23 messages

Joe Oltmann <joe@fecunited.com>
To: Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>

Fri, Jan 22, 2021 at 10:15 AM

Sidney,

Might be a good idea to connect. We have some interesting information on Eric Coomer. You also need to be aware of what we are doing in Colorado in gaining access to the Dominion systems under the radar. We have several county clerks cooperating. Need to settle down the chaos so you can get a grasp on all of the information. The audit in Antrim county is something that will help in your lawsuit against Dominion as well. They are puffing their chest but the reality is we already have the data to show they are a fraudulent company with a system that is designed to defraud the American people.

Also need to know who the attorney is that is representing you in the Coomer suit, which is a joke BTW or if you are doing that yourself.. I can connect you to our attorney team as well. We are an ANTI SLAPP jurisdiction so this should be interesting given the consequences of this for Eric including attorney fees. Having talked to the lawyers for OANN, they want to get to discovery so need to know if you want the same thing. Otherwise, a lawyer with a crayon will be able to dismiss this suit. Just want to make sure we are all on the same page.

Look forward to connecting. Let me know what works.

Warm regards,

Joe

Sidney Powell <sidney@federalappeals.com>
To: Joe Oltmann <joe@fecunited.com>
Cc: Lyn Duden <lduden@pinbn.com>, Howard Kleinhandler <howard@kleinhandler.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>

Fri, Jan 22, 2021 at 11:19 AM

Thank you Joe. I haven't been served and if I ever am, would be out for lack of personal jurisdiction. Copying Howard and Jesse who will help, and we have lot going. Look forward to connecting. Sidney

[Quoted text hidden]

Sidney Powell

www.SidneyPowell.com

Federal appellate attorney and author of LICENSED TO LIE & co-author of CONVICTION MACHINE

20CV34319-JOdisclosures-0864

Joe Oltmann <joe@fecunited.com>

Fri, Jan 22, 2021 at 1:12 PM

To: Sidney Powell <sidney@federalappeals.com>

Cc: Lyn Duden <lduden@pinbn.com>, Howard Kleinhendler <howard@kleinhendler.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>

Howard, Jesse,

Good to meet you. Sidney is going to need the Antrim county raw files and the three other red team analysis for Dominion. It should make this case stronger. I can give you access to those 103GB of data as well as the updated Antrim County report. Enclosed is the one pager diagram. It is how they did the big con and the little cons. This is not some guess as to the vulnerabilities or how they stole it, it is fact. I am, or was until the vile attacks on the left the CEO of a data company (I still own 80% of the company so I am fine). You have to stack math and science on validated data and you cannot look at Dominion state by state, so you have to stack the incidents AND all the states and compress the system processes to expose the vulnerabilities and how they did it. Unfortunately, it was not until the final hour that everyone started listening and setting aside personal interest that made it impossible to stop the steal... too little too late. it shows that Dominion is in fact a fraud as are the people in it. Available to help. Lyn will connect us.

God bless you all and in all this, He is at work.

Warm regards,

Joe Oltmann

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Fri, Jan 22, 2021 at 1:21 PM

To: Sidney Powell <sidney@federalappeals.com>

Cc: Lyn Duden <lduden@pinbn.com>, Howard Kleinhendler <howard@kleinhendler.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>

Diagram attached. Apologies.

Warm regards,

Joe

From: Sidney Powell <sidney@federalappeals.com>

Date: Friday, January 22, 2021 at 11:19 AM

To: Joe Oltmann <joe@fecunited.com>

Cc: Lyn Duden <lduden@pinbn.com>, Howard Kleinhendler <howard@kleinhendler.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>

Subject: Re: Catching up.

Thank you Joe. I haven't been served and if I ever am, would be out for lack of personal jurisdiction. Copying Howard and Jesse who will help, and we have lot going. Look forward to connecting. Sidney

[Quoted text hidden]



Screen Shot 2021-01-05 at 8.00.00 PM.png
324K

Howard Kleinhendler <howard@kleinhendler.com>

Fri, Jan 22, 2021 at 1:22 PM

To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>

Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Joe:

Thanks for your message. We definitely want your 103GB of data and your summaries. We are preparing a new case that will absolutely benefit from your analysis that stacks the states.

Copying Peter and Juli Haler here who I believe you have already worked with.

Thanks.

Howard Kleinhendler Esquire

[369 Lexington Avenue](#), 12th Floor

New York, New York 10017

Office (917) 793-1188

Mobile (347) 840-2188

howard@kleinhendler.com

www.kleinhendler.com

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Tue, Jan 26, 2021 at 12:46 PM

To: Howard Kleinhendler <howard@kleinhendler.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Hey everyone. The case shows that Sidney was served through Lee Sparksman at 2911 Turtle Creek Blvd, Dallas Texas 75219. It shows that this happened on the 6th of January. You need to get ahead of this.

Warm regards,

Joe

[Quoted text hidden]

Sidney Powell <sidney@federalappeals.com>

Tue, Jan 26, 2021 at 7:38 PM

To: Joe Oltmann <joe@fecunited.com>

Thank you Joe. We had no idea! Sidney

Sent from my iPhone

On Jan 26, 2021, at 2:46 PM, Joe Oltmann <joe@fecunited.com> wrote:

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>

Thu, Jan 28, 2021 at 9:30 AM

To: Howard Kleinhendler <howard@kleinhendler.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Howard,

I don't know if I have worked with them. Apologies to both of you if I have. I will send you the USERNAME and PASSWORD in separate emails.

USERNAME: access

From: Howard Kleinhendler <howard@kleinhendler.com>
Date: Friday, January 22, 2021 at 1:22 PM
To: Joe Oltmann <joe@fecunited.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>
Subject: RE: Catching up.

Joe:

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com> Thu, Jan 28, 2021 at 9:39 AM
To: Howard Kleinhendler <howard@kleinhendler.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Password:



[Quoted text hidden]

Joe Oltmann <joe@fecunited.com> Thu, Jan 28, 2021 at 9:40 AM
To: Howard Kleinhendler <howard@kleinhendler.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Website: www.bellrag.com

[Quoted text hidden]

Sidney Powell <sidney@federalappeals.com> Thu, Jan 28, 2021 at 9:40 AM
To: Joe Oltmann <joe@fecunited.com>
Cc: Howard Kleinhendler <howard@kleinhendler.com>, Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, JuliZHaller <JuliZHaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>, Wilson Powell <nosliwbp@gmail.com>

Include nosliwbp@gmail.com on data too please

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com> Thu, Jan 28, 2021 at 9:43 AM

To: Howard Kleinhendler <howard@kleinhendler.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, "julizhaller@protonmail.com" <julizhaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>

Need to make sure you notify me when you download and complete transfer. There is a password in the middle of the page. Pay attention to those and the instructions. If you have any issue, please let Lyn, my PA know. We will be monitoring IP address access, so please do not use VPN or it will shut down access.

Warm regards,

Joe

[Quoted text hidden]

Sidney Powell <sidney@federalappeals.com>

Thu, Jan 28, 2021 at 9:44 AM

To: Joe Oltmann <joe@fecunited.com>

Cc: Howard Kleinhendler <howard@kleinhendler.com>, Lyn Duden <lduden@pinbn.com>, "Jesse R. Binnall" <jbinnall@harveybinnall.com>, Abigail Frye <afrye@harveybinnall.com>, JuliZHaller <JuliZHaller@protonmail.com>, Peter Haller <peterhaller@hillstrat.com>, Wilson Powell <nosliwbp@gmail.com>

I suggest we have Wilson handle the data. Sidney

[Quoted text hidden]

W <nosliwbp@gmail.com>

Thu, Jan 28, 2021 at 12:04 PM

To: Sidney Powell <sidney@federalappeals.com>, joe@fecunited.com

Cc: Howard Kleinhendler <howard@kleinhendler.com>

Hi Joe,

Howard mentioned you would have access to the files that are prompting passwords on the Thumb Drive downloads? Do we have them?

Thank you,

W

On Thu, Jan 28, 2021 at 12:13 PM W <nosliwbp@gmail.com> wrote:

Hi Howard,

I was able to log in and look at this info.

My cell is 214-803-6477
and I will expect a call.

Thank you,

W

On Thu, Jan 28, 2021 at 11:06 AM Sidney Powell <sidney@federalappeals.com> wrote:

Definitely. Wilson can coordinate

Sidney Powell

On Thu, Jan 28, 2021, 12:02 PM Howard Kleinhendler <howard@kleinhendler.com> wrote:

Whoever you designate is fine. But we have a working outline of our next steps. And I need specific information. So whoever is reviewing this I think will be helped if I can talk to him/her first.

Howard Kleinhendler Esquire
369 Lexington Avenue, 12th Floor
New York, New York 10017
Tel. (917) 793-1188
Mobile (347) 840-2188
howard@kleinhendler.com
www.Kleinhendler.com

From: Sidney Powell <sidney@federalappeals.com>
Sent: Thursday, January 28, 2021 12:00:40 PM
To: Howard Kleinhendler <howard@kleinhendler.com>
Cc: Wilson Powell <nosliwbp@gmail.com>
Subject: Re: Catching up.

Michael G is really good at data too. We will probably need both of them.

On Thu, Jan 28, 2021 at 11:58 AM Howard Kleinhendler <howard@kleinhendler.com> wrote:

Wilson:

Can we talk for a few minutes so I can tell you what I am particularly interested in for the offensive moves we are working on.

[Quoted text hidden]

--
Sidney Powell

Texas Attorney & Author of *Licensed to Lie: Exposing Corruption in the Department of Justice*, available on [Amazon](https://www.amazon.com/dp/B089888888) or at www.LicensedtoLie.com + Senior Policy Advisor @AmericaFirstPol and Senior Fellow at the London Center for Policy Research
www.FederalAppeals.com

For having lived long, I have experienced many instances of being obliged by better information, or fuller consideration, to change opinions even on important subjects, which I once thought right, but found to be otherwise. It is therefore that the older I grow, the more apt I am to doubt my own judgment, and to pay more respect to the judgment of others.

Benjamin Franklin

For having lived long, I have experienced many instances of being obliged by better information, or fuller consideration, to change opinions even on important subjects, which I once thought right, but found to be otherwise. It is therefore that the older I grow, the more apt I am to doubt my own judgment, and to pay more respect to the

judgment of others.

Benjamin Franklin

Joe Oltmann <joe@fecunited.com>
To: W <nosliwbp@gmail.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Howard Kleinhendler <howard@kleinhendler.com>

Thu, Jan 28, 2021 at 2:14 PM

Absolutely.

[REDACTED]

[REDACTED]

Password on separate email to follow

Warm regards,

Joe

[Quoted text hidden]

W <nosliwbp@gmail.com>
To: Joe Oltmann <joe@fecunited.com>

Thu, Jan 28, 2021 at 2:54 PM

Thanks, it is actually for the files themselves, not the download site.
Is there a PW for that?

Thank you,

W

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: W <nosliwbp@gmail.com>, Sidney Powell <sidney@federalappeals.com>
Cc: Howard Kleinhendler <howard@kleinhendler.com>

Thu, Jan 28, 2021 at 2:56 PM

[REDACTED]

[Quoted text hidden]

W <nosliwbp@gmail.com>
To: Joe Oltmann <joe@fecunited.com>
Cc: Sidney Powell <sidney@federalappeals.com>, Howard Kleinhendler <howard@kleinhendler.com>

Thu, Jan 28, 2021 at 2:57 PM

Still says incorrect password when I try to open a file.
It is after I get in and download a zip file.

Thank you,

W

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: W <nosliwbp@gmail.com>

Thu, Jan 28, 2021 at 3:21 PM

It is on the page in the middle there are two passwords.

XXXXXXXXXX

When you get on the page it is just above the files.

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: W <nosliwbp@gmail.com>

Thu, Jan 28, 2021 at 3:21 PM

Cc: Sidney Powell <sidney@federalappeals.com>, Howard Kleinhendler <howard@kleinhendler.com>

These files contains raw images and data from Antrim election machines. The passwords for the zip files are one of two: XXXXXXXXXX -OR- XXXXXXXXXX - you must download all zip files together of a group before extracting them - they are split only due to size.

[Quoted text hidden]

Howard Kleinhendler <howard@kleinhendler.com>
To: Joe Oltmann <joe@fecunited.com>
Cc: Wilson Powell <nosliwbp@gmail.com>

Fri, Jan 29, 2021 at 11:06 AM

Joe:

Is there a number you can be reached at?

Howard Kleinhendler Esquire
369 Lexington Avenue, 12th Floor
New York, New York 10017
Tel. (917) 793-1188
Mobile (347) 840-2188
howard@kleinhendler.com
www.Kleinhendler.com

From: Joe Oltmann <joe@fecunited.com>
Sent: Thursday, January 28, 2021 5:21:39 PM
To: W <nosliwbp@gmail.com>

Cc: Sidney Powell <sidney@federalappeals.com>; Howard Kleinhendler <howard@kleinhendler.com>
Subject: Re: Catching up.

[Quoted text hidden]

W <nosliwbp@gmail.com>
To: Howard Kleinhendler <howard@kleinhendler.com>
Cc: Joe Oltmann <joe@fecunited.com>

Fri, Jan 29, 2021 at 12:11 PM

Hi Joe,

I don't think a number sent through but mine is 214-803-6477.

Thank you,

W

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Howard Kleinhendler <howard@kleinhendler.com>
Cc: Wilson Powell <nosliwbp@gmail.com>

Fri, Jan 29, 2021 at 7:44 PM

Just getting this Howard. Apologies. Yes. 303-667-5105

Joe

Sent from my Pocket so please excuse the errors...



|

On Jan 29, 2021, at 11:07 AM, Howard Kleinhendler <howard@kleinhendler.com> wrote:

[Quoted text hidden]

Voter Fraud Follow Up

3 messages

Taylor Scott <Taylor.Scott@herringnetwork.com>
To: "joe@fecunited.com" <joe@fecunited.com>

Tue, Nov 10, 2020 at 1:48 PM

Good Afternoon,

We are following up regarding your email of Voter Fraud. Can you explain your story for us?

Do you have any hard evidence to prove this?

Best Regards,

Taylor Scott

AWE



4757 Morena Blvd

San Diego, CA 92117

Office- 858-270-6900 x116

Fax – 858-270-6901

Taylor.Scott@HerringNetwork.com;

www.oann.com

www.awetv.com

Joe Oltmann <joe@fecunited.com>
To: Taylor Scott <Taylor.Scott@herringnetwork.com>

Tue, Nov 10, 2020 at 2:27 PM

Hi Taylor,

Yes I do. What I have we did in the podcast at Conservative Daily yesterday. We have 80 screenshots of Eric Coomer's FB page that is private. I was also on an Antifa call where Eric Coomer stated that Trump cannot win, he made sure of it. (paraphrased).

If this is not a smoking gun that connects a ANTI-Trump, erratic leader of Dominion, I don't know what does. I am the CEO of a data company. I know for a fact that you cannot secure an online voting system. I also know what pattern algorithms can change the votes. The further you go down the line the more scary it gets. Eric Coomer was the spokesperson in EVERY state that an RFP was written. He was the spokesperson for news articles. If you check the patent office and do research on the others that hold patents, it will scare you what you will uncover. Arizona, Georgia, Pennsylvania, all on boarded in the last 3 years with their system.

We have begun talking to the Trump Attorneys and the interest in the story is growing dramatically nationally. There is no way to explain away the anomalies, fraud and code glitches. I am in the software and AI business. As an aside, when you add in the clear bias and essentric behavior of Dr. Eric Coomer and his finger prints as being responsible for the security and strategy of Dominion, there is no way he is or would remain unbiased.

My name is Joe Oltmann, I am a two time EY Entrepreneur of the Year, and a 2020 finalist. I am a father of two, married for 18 years, I give a ton to lots of organizations. My Dad is black, my Mom is white and I grew up in the DC area. I in no way an eccentric or far right conservative. Quite the opposite actually. I am also Joe Otto on Conservative Daily. I started conservative Daily 11 years ago. We have 860,000 members. I also own 13 companies and employ 194 people across different industries. Coming out from behind the veil and showing my face has had consequences, but this is too important a time in my opinion not to speak up. This is just a bit of background. IT in no way makes my data less or more valid. The data speaks for itself.

Here is the beginning notes for the podcast. It could be the biggest tie to the validity of the voting system and turn the tide of things, IMHO. But obviously I relent and give you the opportunity to decide if it is important. Here is the link to the CD podcast as well. <https://www.facebook.com/ConservativeDaily/videos/367415277670909>

Thanks Taylor.

Warm regards,

Joe

The election was fixed. First, who is Dominion. Who runs the Company and why is that important. This conversation will be about Eric Coomer. The Director of Strategy and Security for Dominion Voting Systems.

I want to give you context on what we are going to discuss. About 3 weeks ago, I gave a speech at an FEC meeting. As you may or may not know, I am in the data business. I have been incredibly focused on Antifa and the threat of their infiltration of our journalism, and the Democrat party.

You all have seen the video of Kris Jacks, the Our revolution leader in Northern Colorado, who called for the beheading of Americans. If you check out the video from project veritas, you will see that he stated they hold a majority of the seats in the Democrat party across colorado. In a subsequent video, I observed a journalist who has been known for being a rhetoric Junkie and Antifa member. She is a journalist and she is also a Our Revolution leader in southern Colorado. She uses the systems in the Business Journal and Colorado Springs Independent to gather and dox people in the community. In this use of gathering intel, infiltrating calls, groups and collecting information on individuals we uncovered 13 antifa journalists across colorado.

So let me back up after this short bit and tell you about a call I was able to listen in on. And why this is important. Ok, So I was on a call discussing the “fascists” it was fascinating honestly how they thought and spoke. It was downright scary. As the call carried on a person who called themself Eric was on the call. Now I want to start that I cannot verify on this call that it is the same Eric but let me tell you as I jotted down notes what I discovered. This is from my notes:

I have a bunch to add. We have to be prepared for the new future where we put down these fascist fucks.

Someone interrupts. Who is Eric?

Someone answers, Eric is the Dominion guy.

Go head Eric.

Someone interrupts, What are we going to do if fucking Trump wins.

Eric responds, (paraphrased) Don't worry about the election. Trump is not going to win. I made fucking sure of that.. hahaha”

Someone responds fucking right

Eric continues with fortifying the groups and recruiting. He was eccentric and boisterous. I compared what I remembered hearing with his videos I was able to find... and I think it is a match but not sure.

I laughed at the time but did my intel research on him. I discovered an Eric Coomer who worked at Dominion Voting Systems. I did not find anything out of the ordinary on Eric honestly. But noted that someone in dominion leadership appears to be Antifa. I researched him, but did not realize that dominion was used by many of the states in swing areas for elections till later.

Fast forward to Friday. I get a text from a friend. He sends me over a story about Dominion Voting Systems being tied to the Clinton Foundation, Dianne Feinsteins husband and long time campaign manager. The information started to pour in. I then got another set of texts that had a story that talked about Dominion Voting Systems and the name Eric Coomer popped up. I recalled that name and went into my notes... I was astonished. here was seemingly the same guy I heard being bragedocious about making sure trump does not

win and so I started digging into everything Eric Coomer. What I found out about this guy will scare you. This is the guy responsible for system security.

I then started using intel to get FB posts, and collecting information. He reposted Antifa manifesto. He posted kill cops , fuck the USA. You cannot make this stuff up ladies and gentlemen...

[Quoted text hidden]

Joe Oltmann <joe@fecunited.com>
To: Taylor Scott <Taylor.Scott@herringnetwork.com>

Tue, Nov 10, 2020 at 11:20 PM

I gave you what I can. Been instructed not to talk about it any longer with you or anyone. Hope it leads you down a path that helps you break open more. I will tell you to dig into the RFPs and the court cases in different states. Look into Eric's patents and his partners in those. Also look into his associates at Dominion.

Good luck Taylor. I do appreciate your network.

Warm regards,

Joe

From: Taylor Scott <Taylor.Scott@HerringNetwork.com>
Date: Tuesday, November 10, 2020 at 1:48 PM
To: "joe@fecunited.com" <joe@fecunited.com>
Subject: Voter Fraud Follow Up

Good Afternoon,

[Quoted text hidden]

This is Jim Hoft

3 messages

Jim Hoft <midwestjim@charter.net>
To: joe@fecunited.com

Sun, Nov 15, 2020 at 6:34 PM

Joe - This is Jim Hoft. I have meeting until 8 central.

Can talk then.

314-304-0830

Jim

Jim Hoft

Founder-Editor

The Gateway Pundit

<https://www.thegatewaypundit.com/>

midwestjim@charter.net

GP



Virus-free. www.avg.com

Joe Oltmann <joe@fecunited.com>
To: Jim Hoft <midwestjim@charter.net>

Sun, Nov 15, 2020 at 6:36 PM

Sounds great. Thanks Jim. I will call you a bit after 8.

303-667-5105

Warm regards,

Joe

[Quoted text hidden]

Jim Hoft <midwestjim@charter.net>
To: Joe Oltmann <joe@fecunited.com>

Sun, Nov 15, 2020 at 7:00 PM

Please try at 8:15

My call is going over.

Jim

[Quoted text hidden]



Diagram

Joe Oltmann <joe@fecunited.com>

Wed, Jan 6, 2021 at 7:46 AM

To: "emeraldrobinson@protonmail.com" <emeraldrobinson@protonmail.com>

Cc: "garrickdavis@protonmail.com" <garrickdavis@protonmail.com>, "mdeperno@protonmail.com" <mdeperno@protonmail.com>

Bcc: grpennington@protonmail.com

I am publishing the Dominion audit raw data from Antrim County machines... Sitting with Matt DePerno and his information overlays this diagram.. perfectly.

Warm regards,

Joe



Screen Shot 2021-01-05 at 8.00.00 PM.png
324K

INSPECTION CAN BE
MANUAL OR THROUGH
AUTOMATION

ABSENTEE BALLOTS



SCAN ENVELOPES
FOR BARCODE

1



INSPECT SIGNATURE
ADJUDICATION #1

CURED

RIGHT TO CURE

REJECTED



COMPARE TO RECORDS



ADJUDICATION #2

INTENT
DETERMINED

GOOD COUNT

TABULATION

FAKE
BALLOT

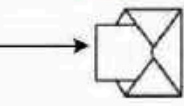
BALLOT

PHANTOM
BALLOT

2

4

TABULATION
TRANSFER



ENVELOPE

3

VERIFIED





Joe Oltmann <joe@fecunited.com>

Diagram

Joe Oltmann <joe@fecunited.com>

Thu, Jan 14, 2021 at 4:23 PM

To: garrickdavis <garrickdavis@protonmail.com>, GRP3 <GRPennington@protonmail.com>,

"emeraldrobinson@protonmail.com" <emeraldrobinson@protonmail.com>

Cc: "mdeperno@protonmail.com" <mdeperno@protonmail.com>

Are we looking for all the information related to the GA, PA or all together? The team that Don, Justin and Lynda put together has ROCK solid actual line by line data. IT is indisputable.

Warm regards,

Joe

[Quoted text hidden]

IOS IMESSAGE/SMS/MMS

CHAT PARTICIPANTS	
Number of participants	2
Display names	-13036675105 Local User
Local user	
CONVERSATION DETAILS	
Number of messages	14
First message sent date/time	11/16/2020 2:15:31 AM
Last message sent date/time	11/25/2020 5:31:16 AM
Case time zone	(UTC) Coordinated Universal Time

+13036675105

I sent someone to his house and no sign of him

↔ Unknown direction
11/24/2020 4:32:15 AM

[Back](#)

14 Comments



August 2

Joe Oltmann

Forwarded Message

From: CodeMonkeyZ

Still verifying the final piece of the puzzle.

We are not done yet... 2.2K Joe Oltmann, 3:46 PM

Discussion started

Mr Kaz

Joe, are you connected with Ron or are you learning as he posts? 3:48 PM

MK

PL



3:48 PM

Joe Oltmann Chat

Mr Kaz

Joe, are you connected with Ron or are y...

Connected 3:49 PM

**Mr Kaz**

Joe Oltmann Chat

Connected

MK

Excellent! 3:50 PM

Ralph Lewis

I'm not expecting DJTrumpet to be significantly involved with DOING the WORK of finding, protecting and producing any "final" piece of the puzzle. He may orate about it as though he did. DJTrumpet is more of

RL



Comment

**Exhibit
PX 0105**
Oltmann

Analysis of the Antrim County, Michigan November 2020 Election Incident

J. Alex Halderman

March 26, 2021

**Exhibit
PX 0106**
Oltmann

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1 Overview

On the night of the November 3, 2020, general election, Antrim County, Michigan published inaccurate unofficial results, attracting national attention (e.g., [29]). Totals in the presidential race and other contests were initially misreported by up to several thousand votes [3], and over the next three weeks, the county restated its results four times to correct this and other errors [4–7].

Antrim’s presidential results have since been confirmed by examining the paper ballots in a county-wide hand count [21] and further affirmed by a state-wide risk-limiting audit [24]. Nevertheless, the incident in Antrim raises several questions: What caused the errors? Are they evidence of a cyberattack or other foul play? Have they been fully corrected? Could similar problems affect other localities? What should be done to prevent such issues in the future?

The Michigan Secretary of State and the Department of Attorney General asked me to perform a forensic investigation of the incident in order to answer these questions. I analyzed data from Antrim County’s election management system (EMS) and from the memory cards used in the county’s ballot scanners. Using this data, I reconstructed the events that led to the initially erroneous results. I was able to precisely account for the discrepancies and identify the underlying causes. I also electronically recounted the votes using data from the memory cards to further check the accuracy of the final reported totals.

1.1 Summary of Findings

On the basis of my investigation, I draw several main findings and conclusions:

- The explanations provided by the county [2] and the Department of State [23] are correct that the inaccurate unofficial results were a consequence of human errors, but the problems were somewhat more complicated than initially understood. The human errors that initiated the incident were compounded by gaps in election procedures and their adherence. The election software also could have done more to help election staff avoid making mistakes that could lead to erroneous results.
- Although vulnerabilities in election technology are well documented (see, e.g., [11, 27]), the Antrim County incident was not caused by a security breach. There is also no credible evidence that it was caused deliberately. While this report is not a comprehensive security review of Antrim’s voting system, I note in passing some opportunities for security improvements.
- The major discrepancies in Antrim’s results have been fully corrected. The final results match the poll tapes printed by the individual ballot scanners, and there is no evidence that the poll tapes are inaccurate, except for in specific precincts where particular circumstances I explain affected small numbers of votes, mainly in down-ballot races. These remaining errors affect too few votes to change the outcome of any contest but the Central Lake

Village Marihuana¹ Retailer Initiative, for which the final reported outcome is potentially incorrect due to the omission of a single vote because of a separate human error.

- The incident in Antrim County arose due to the county’s mishandling of last-minute ballot design changes, a circumstance that is unlikely to have occurred widely in Michigan during the 2020 election. Nevertheless, in Antrim, several layers of protections that are supposed to ensure accuracy broke down due to human errors on multiple levels, including mistakes by county and township staff while operating the election technology, procedural missteps while processing ballots in some localities, and the failure of the county canvassers to detect lingering discrepancies. These failings suggest a need for greater oversight of county and local election administration in Michigan. I also recommend several changes to election technology, training, and procedures in order to better guard against similar problems in future elections.

1.2 Summary of the Incident

My analysis shows that the incident in Antrim County unfolded as follows:

1. In October, Antrim changed three ballot designs to correct local contests after the initial designs had already been loaded onto the memory cards that configure the ballot scanners. For technical reasons, all memory cards should have been updated following the changes. Antrim used the new designs in its election management system and updated the memory cards for one affected township, but it did not update the memory cards for any other scanners.
2. When the changes were made, a small number of voters had already received absentee ballots reflecting the initial designs. These voters were mailed revised ballots, but some of the initial ballots were voted. Protections ensured that at most one ballot was accepted from each voter, but there was no technical or procedural mechanism in place to distinguish between the different versions of the ballot designs.
3. Local staff performed logic and accuracy testing to ensure that the scanners were working. However, testing was not repeated after the ballot design changes, except in the one township where the memory cards were updated. The county did not test loading scanner results into its election management system, which the state recommends but does not require.
4. On election day, the scanners appear to have functioned normally for ballots that matched the ballot designs on their memory cards. However, they were not configured to handle the initial and revised ballot designs simultaneously, which caused inaccurate results in specific down-ballot contests in the three precincts where ballot designs had changed. In all other precincts, the results on the poll tapes from individual scanners were unaffected by this problem.

¹This is the spelling used in the title of the initiative and in Michigan statutes.

5. After polls closed, the county loaded results from the memory cards into its election management system for reporting. Three cards failed to load and were entered manually from the poll tapes. The other 15 cards appeared to load normally, but 13 had not been updated after the ballot design changes. Internally, the Dominion voting system uses a sequence of numbers to identify all available choices across all ballot designs. The scanners use these identifiers to record voter selections. The ballot design changes had the effect of altering the expected candidate identifiers in most of the county's precincts. When memory cards that used the old identifiers were interpreted by the election management system using the new identifiers, votes were assigned to the wrong candidates, causing large errors in the initial reported results for most contests in all but a few precincts. The election management system did not alert the operator about this problem while loading the results.
6. County staff, who finished generating the initial unofficial results at 4 a.m. on election night, apparently did not review them closely enough to detect the obvious discrepancies before publishing them. A few hours later, Antrim learned that the initial results were erroneous and took them down. Staff manually entered results from the poll tapes for the affected scanners, and the county published revised unofficial results on November 5. However, county staff neglected to remove some of the inaccurate data that had been loaded from the memory cards, so the reported totals in some precincts were the sum of the corrected and erroneous results. The county took down the results again to correct this.
7. In one locality, Central Lake Village, the election day poll tape showed the wrong school board race, because, although the ballot design had been changed to include the correct race, the scanner's configuration had not been updated to reflect this. On November 6, Central Lake rescanned its ballots using the updated configuration, and the results were incorporated into the county's certified results published that day. However, the evidence I examined suggests that three ballots from Central Lake Village that were scanned on election day were not rescanned—potentially due to human error—and are not included in the final results. One of these ballots, if it is actually valid, would likely change the outcome of the Central Lake Village Marihuana Retailer Initiative, which was decided by a single vote.
8. Antrim's November 6 certified results contained data entry errors that occurred when results were entered manually to correct the initial reporting problem. These errors should have been detected during the county canvass but were not. The county restated its results on November 16 to correct some of the data entry errors and again on November 21 to correct the reminder.
9. The final certified results match the scanner poll tapes in essentially all cases. However, my analysis shows that both the poll tapes and the final results are inaccurate with respect to a few down-ballot contests in the three precincts where ballot designs changed, as a result of the county's failure to appropriately distinguish between ballots voted using the old and new ballot designs. The largest discrepancy is in Central Lake Village, where the poll

tape is inaccurate for the Central Lake Schools school board contest and State Proposal 20-1. I estimate that approximately 72 ballots are affected. Small numbers of votes may also have been affected in Mancelona Village for the Village Trustee race and in Warner Township for the Boyne Falls Public Schools Sinking Fund Millage Proposal. The circumstances that caused these discrepancies did not affect any other contests and do not affect enough votes to change the outcome of any contest.

10. In December, the state conducted a county-wide hand count of the presidential contest that agreed with the final reported results to within 0.08%. In January, the state conducted a state-wide risk-limiting audit of the presidential contest that affirmed the reported outcome. These findings and my analysis all support the conclusion that there are no significant errors in Antrim County's final presidential results.

1.3 Organization of this Report

In Section 2, I describe Antrim County's voting system and the data from it that I examined. In Section 3, I investigate and explain the discrepancies that occurred during county-level reporting. In Section 4, I investigate and explain the discrepancies that occurred on poll tapes from individual scanners. In Section 5, I respond to the report prepared by Allied Security Operations Group. In Section 6, I state additional conclusions, and in Section 7, I offer a series of recommendations for preventing similar problems in future elections. My own qualifications and background are stated in Appendix A.

2 Background

2.1 Antrim County’s Election Technology

In 2017 and 2018, Michigan deployed new voting equipment [30]. County and local clerks selected from among three approved systems produced by different vendors. Antrim County adopted the Democracy Suite system produced by Dominion Voting Systems, consisting of ImageCast Precinct (ICP) ballot scanners, ImageCast X (ICX) ballot-marking devices (BMDs),² and the Democracy Suite election management system (EMS). As deployed in Antrim, the EMS consists of a single desktop PC running specialized software for election preparation and results aggregation and reporting. Antrim uses Democracy Suite version 5.5, which is federally certified by the U.S. Election Assistance Commission [31].

During a typical election, Antrim’s equipment operates as follows:

1. *Election preparation.* Before the election, workers design the ballots using Election Event Designer (EED), one of several modular components of the EMS software [8]. They create an “election project” (a database corresponding to the election) and define the contests and choices for each precinct. EED then generates ballot designs for printing and election definition files (digital descriptions of the ballot designs) for use by the scanners and BMDs.³

Like most Michigan counties, Antrim outsources these steps to a service provider, in this case Grand Rapids-based ElectionSource. ElectionSource sends the county an “election package”—a file containing the election project, ballot designs, election definitions, and other associated data. The county imports these into its EMS and loads the election definitions onto memory cards used by the scanners and USB sticks used with the BMDs [8].

Finally, townships load the memory cards into their scanners and perform logic and accuracy (L&A) testing. In this process, workers scan ballots with known selections and confirm that the scanners produce accurate results [13, 19].

2. *Voting and counting.* Vote counting begins on election day. In-person voters insert their ballots into the scanners, which tabulate the selections and retain the physical ballots in a ballot box. To process absentee ballots, most localities have poll workers feed them into the same scanners used for in-person voting. Other localities operate separate absent voter counting boards (“AV boards” or “AVCBs”) with dedicated scanners [15].

The scanners count votes by detecting marks in particular ballot locations called “voting targets”, which are specified by the election definition on the

²In Michigan, most voters mark ballots by hand, but each poll place also provides one or more touch-screen BMDs that voters may use to mark and print their ballots. Michigan election procedures refer to the BMDs as “voter-assist terminals” or VATs.

³Although Michigan election procedures sometime refer to election definitions as “programming” or “programs” [13, 14], in the Dominion system they are not computer programs in the sense of “software” but rather collections of data files. It is incorrect to characterize changing the election definition as a “software update.”

scanner’s memory card. If the area within a voting target is darker than a set threshold, the scanner treats the target as marked. For each ballot, the scanner records which voting targets were marked on its memory card.⁴

After all ballots have been scanned, the scanner prints a “poll tape,” a paper record showing the number of votes recorded for each choice. Poll workers sign the poll tape and return it, along with the the scanner memory card, to the county [14]. The paper ballots are retained by the locality.

3. *Reporting.* County workers use the EMS to aggregate results. An EMS application called Results Tally & Reporting (RTR) [9] loads vote data from the scanner memory cards and stores it in the election project database. Workers then use RTR to generate a report containing results from the entire county. Antrim publishes these result reports on its county website.
4. *Post-election verification.* Several post-election activities involve checks of the accuracy of results. Before the Board of County Canvassers certifies the results, it is supposed to compare the reported totals from the EMS to the poll tape from each scanner [17]. The paper ballots and other records are required to be securely retained, and candidates can petition for a hand recount [16]. In addition, the state audits some selected precincts to verify procedural compliance and accuracy [18]. The state also recently began conducting risk-limiting audits, in which randomly sampled ballots are inspected to confirm the accuracy of the reported outcome for particular contests [22].

2.2 The November 2020 Election in Antrim County

For the November 2020 election, Antrim used 18 scanners. Most of the 15 townships operated a single scanner, but Mancelona Township used two, and an additional two scanners were used for AV counting boards in Elk Rapids and Milton townships. Within each township, there were up to four ballot designs (for residents of villages versus unincorporated areas, or for voters within different school districts), for a total of 43 ballot designs. According to the final results, 16,044 votes were cast from among 22,082 registered voters, a turnout of 73%.

The county posted five sets of election results, dated November 4, 5, 6, 16, and 21 [3–7]. Each had widespread differences from the one before, and in some instances candidates gained or lost more than 5000 votes. The results and differences for the first four contests are summarized in Table 1.

2.3 Materials Examined for this Report

I examined a forensic image of the hard drive from Antrim County’s EMS. The image was provided by the Department of Attorney General; it appears to be the image described in §F and §G of the Allied Security Operations Group (ASOG) report [1], which says ASOG collected it on December 6. I also examined forensic

⁴The ICP scanners can also store a digital image of each ballot, but this is an optional feature that was not enabled in Antrim County during the November election.

		Results published on:					Difference:			
		11/4 (a)	11/5 (b)	11/6 (c)	11/16 (d)	11/21 (e)	$b - a$	$c - b$	$d - c$	$e - d$
President	Biden	7769	7289	5960	5960	5960	-480	-1329	0	0
	Trump	4509	9783	9748	9748	9748	5274	-35	0	0
	Jorgensen	93	197	189	189	189	104	-8	0	0
	Blankenship	20	22	16	16	16	2	-6	0	0
	De La Fuente	12	8	8	8	8	-4	0	0	0
	Hawkins	20	28	28	28	28	8	0	0	0
U.S. Sen.	Peters	7863	6807	5441	5758	5758	-1056	-1366	317	0
	Squier	47	81	79	83	86	34	-2	4	3
	James	4484	9345	9340	9924	9924	4861	-5	584	0
	Willis	91	960	81	82	82	869	-879	1	0
	Dern	19	26	26	27	27	7	0	1	0
U.S. Rep.	Ferguson	7745	6603	5235	5235	5235	-1142	-1368	0	0
	Bergman	4794	10344	10292	10292	10292	5550	-52	0	0
	Boren	125	266	263	263	263	141	-3	0	0
State Rep.	Burke	7697	6143	4800	4800	5578	-1554	-1343	0	778
	Borton	4529	8772	8761	8761	9936	4243	-11	0	1175

Table 1: **Election Results.** Antrim published five results reports, two labeled unofficial (a , b) and three labeled official (c , d , e). Results and differences for the first five contests are shown here, but many others were also in error. The initial report (a) was badly incorrect due to the election definition mismatch. The second report (b) added results entered by hand from poll tapes but failed to remove all of the bad data. The third (c) fixed this, but the manual inputs contained data entry errors that were corrected in two subsequent reports (d , e).

images of the 18 compact flash memory cards used in Antrim’s ICP scanners. At my request, Michigan Bureau of Elections personnel inserted each card into a Digital Intelligence USB 3.0 Forensic Card Reader (in write-blocking mode, to ensure the cards were not inadvertently modified) and used the AccessData FTK Imager application to make a complete copy of the data. Table 2 lists the hashes of these data sources.

Several kinds of data were relevant for my analysis. I will describe others later, but one of the most important was the EMS database. Democracy Suite uses the Microsoft SQL Server database engine, and data for each election project is maintained in a separate database. I extracted the database corresponding to the November 2020 election, which is stored in the files `/Databases/Antrim November 2020-2020-08-03-12-38-25.mdf` and `.ldf`. I analyzed it using Microsoft SQL Server Management Studio and purpose-built software that I wrote in Python.

In reconstructing the sequence of events, I made repeated use of log files stored in the EMS and memory cards. The election database records the actions that users perform on the election project in a table named `UserLog`. These log

Description	SHA-256 Hash of Forensic Image
<i>Computer hard drive:</i>	
County EMS	1d0d7248a0d1db99051a164766a08c895f67f358a58046102e06c20ad4785d81
<i>Ballot scanner memory cards:</i>	
Banks	784ccc460346ba85554c4798f9a1711cd73c860eaea58fa458ac241b049d2510
Central Lake	5bd0798b4a21edd390bee784519764fccc4369bdda6dbe1cafbdf28c11a098bd
Chestonia	48a55e328dcf1816b42a0163a334bb4cf35fa964f1c5460ebc7a4b3fe1a2a474
Custer	1cc9a044a69567a7a38f45892b91c32a4acf631699ad1b4d9d9fbfe72e28e433
Echo	371eb895e922cd2d36cf1859c1d84df01e6fd9176132ec86c889930a20c1a8f8
Elk Rapids 1	ad69dfcadf17b5bb3a744417daae2251aca0f19ccf34af7b5e732a688a4f68f5
Elk Rapids AV	3d4ffc1d8f3ef2b336e5934f0ab98048ad0e24c96efd027f539c68239f6cdbcac
Forest Home	a93c1021367b93ebc89957b5d0c5df6828c885877b2640bf4495441bbe7df474
Helena	529bc91c0d012ef4df947898d8fbde3e0d1c5f430e374080c2e52fb29d02e565
Jordan	c2fc4e0e50ca56d55cfa9b211b120f319be602e357dd09fa12c14203297f3d7
Kearney	2cd3fccb9640738fb062da32d3bb1ea1e4bbafc2e97ca70d87863d12cc8fd38c
Mancelona 1	35f7d069f5556ea9aed3727a0433819b6940cb3474579cf969d2cc208324fbae
Mancelona 2	8931572f6aaeff7c7f80000ca6958da172660b9e3e8d40c073c48008593aa572
Milton 1	386390a3edfa366bb12c8263825d96b51d63a9a4711685edbd7c63fe38e2ba4a
Milton AV	255e1e27daadadbfc7ecc64d1a2c9a8e4f9cf7c65c21e9f18a2ff615dc041d09
Star	9aed3328e89ac4a98ac8ff8877a99b400f092f04a71b738b3e56579384a60379
Torch Lake	60bf46c9fb769fa6a2d238bb1d34387c0854594c9b83c72723ff306dd6abd775
Warner	8132a7e3bf7ac839152d7c6f6f68e9d1316911039241a49f23489a1c2d8e1801

Table 2: **Data Sources.** These are the hashes of the forensic images I examined. The data was collected from the EMS hard drive and 18 scanner memory cards.

entries extended back to the creation of the election project. Each memory card also contains a detailed log of events that occurred on the scanner, in a file named `slog.txt`. These logs extend back to time that each card was initialized, and the EMS stores a copy in the election database when each card is loaded.

I further analyzed the EMS by booting a copy of the hard drive in a virtual machine and interacting with the software. Notably, I was able to do so without Antrim County providing any passwords. The EMS runs Windows 10, and I circumvented the Windows account passwords using a well-known technique [28]. Microsoft SQL Server Management Studio was already installed on the system, and I found that I could use it to view and edit the election databases with no additional passwords. Within the D-Suite application software, each election project is individually password protected. However, I circumvented this by creating a new project with a known password, extracting the password hash from the project’s database, and copying it into the databases for the other projects. Performing similar steps on the real EMS would require physical access to the computer or the hard drive, and I have been informed that Antrim County applies physical controls to limit such access to authorized personnel.

3 Discrepancies in County-Level Reporting

The first part of my investigation concerns errors that were introduced in the course of aggregating and reporting results from precincts across the county, including the major discrepancies in the initial results posted on November 4. I reconstruct the events that led to the errors, explain their causes, and verify that they have been corrected. My analysis confirms that the final reported results match the results obtained by the individual scanners.

3.1 Preparations for the Election

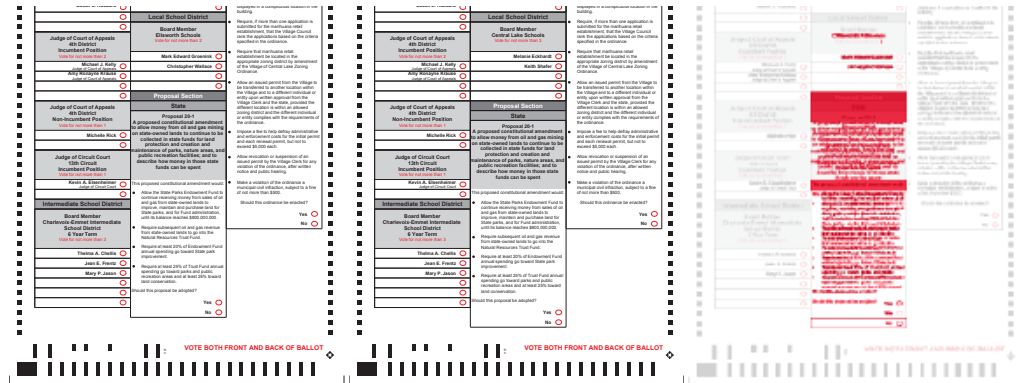
The sequence of events that led to the reporting discrepancies began long before the election, during the process of designing the ballots. According to a timeline produced by Antrim County [2], the county received initial proofs of the ballot designs from ElectionSource on September 5. After a series of corrections, county staff approved the designs on September 18 and received a flash drive from ElectionSource containing the election package on September 29. County staff loaded the election package into the EMS, copied the election definition files for the scanners and BMDs to removable media, and distributed the media to localities for use in the election. The memory card logs show that townships loaded the media into their scanners and BMDs and performed logic-and-accuracy testing on various dates in October.

Typically, the ballot designs and election definitions would have remained unchanged from this point on. However, according to Antrim’s timeline, on October 5 and 7, the county alerted ElectionSource about errors that had been identified in three of the ballot designs, which affected parts of Central Lake, Mancelona, and Warner townships. ElectionSource applied the corrections and provided a revised election package on October 23. The election project log shows that Antrim loaded the revised election package into its EMS that day.

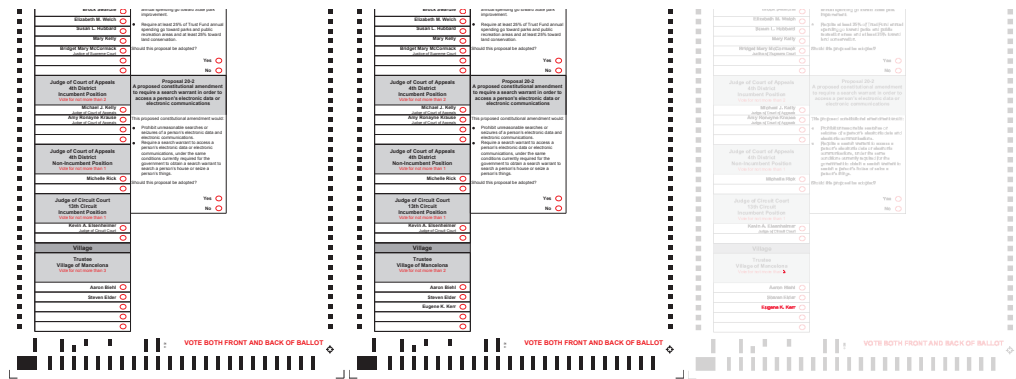
At this point, county staff *should have* updated the removable media for every scanner and BMD in the county to ensure that their election definitions matched the EMS’s. In fact, the only scanners that were updated before election day were the two in Mancelona Township. This would prove to be a consequential mistake.

Election Packages By inspecting the EMS image, I identified an election package file with metadata indicating that it was created and last accessed on September 29. The file is located at `/Users/EMSADMIN/Desktop/Project Package/Project Package/Antrim November 2020-2020-08-03-12-38-25_package.zip`. It appears to be a backup of the first election package provided by ElectionSource on September 29. I will refer to this file as the initial election package.

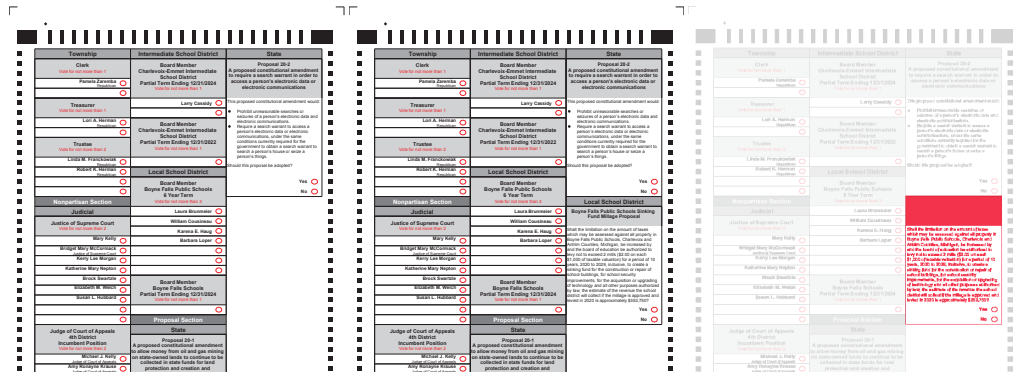
I also identified an election package file with metadata indicating that it was created and last accessed on October 23. It is located at `/Users/EMSADMIN/Desktop/Project Package/Antrim November 2020-2020-08-03-12-38-25_package.zip`. It appears to be a backup of the second election package provided by ElectionSource. I will refer to this file as the revised election package.



(a) Central Lake, Precinct 1V



(b) Mancelona, Precinct 1V



(c) Warner, Precinct 1BF

Figure 1: **Ballot Design Changes.** The designs of three ballots were changed between the initial election package (*left column*) and the revised package (*center column*). The differences are highlighted in red (*right column*). These changes started a chain of events that led to the publication of erroneous results.

Ballot Design Changes I extracted the contents of the election packages. Among other files, each contains a PDF file of each ballot design. I compared the PDF files in the initial election package to those in the revised election package and found that exactly three ballot designs differed, as illustrated in Figure 1. The differences match Antrim’s description of the ballot changes [2]. They are:

- *Central Lake, Precinct 1V*. On the ballot for Central Lake Village, the school board contest was corrected from the Ellsworth School District to the Central Lake School District, as shown in Figure 1a. The number of choices remained the same, but the contest changed from vote-for-two to vote-for-three, necessitating an additional write-in blank. This shifted the position of the contest below, State Proposal 20-1, down by one row.
- *Mancelona, Precinct 1V*. On the ballot for Mancelona Village, a candidate (Eugene K. Kerr) was added to the Village Trustee contest, shown in Figure 1b. The contest was also changed from vote-for-three to vote-for-two, so there was one fewer write-in blank and no change to the position of any contest.
- *Warner, Precinct 1BF*. On the ballot for part of Warner Township, a contest was added for the Boyne Falls Public Schools Sinking Fund Millage Proposal, as shown in Figure 1c. The new contest appears at the end of the last column of the last page of the ballot, so no other contest changed position.

Scanner Election Definitions The election packages also contain election definition files to be copied to each scanner’s memory card. I compared the election definition files that are actually on the memory cards to those in the initial and revised election packages.

Every memory card matched either the initial or the revised election package, indicating that the election definitions on the cards were not altered after being written. Four cards matched the revised election package: Banks Township, Central Lake Township, and both precincts from Mancelona Township. The Central Lake card contains the revised election definition because it was reinitialized after the election in order to rescan the ballots. In Banks Township, the election definitions from the initial and revised packages are identical (for reasons that will become clear), so although the card was initialized using the initial election package, it happens to match the revised election package as well. All of this is consistent with Antrim’s claim that the only scanners that used the revised election definitions on election day were those in Mancelona Township.

3.2 Events on Election Night

On the night of the election, November 3, county staff began loading results into the EMS as scanner memory cards arrived from around the county. I reconstructed events that night from the EMS user log, as summarized in Table 4.

The first card was successfully loaded at 9:49 p.m. The earliest sign of trouble occurred when loading the next card, from Warner Township, at 10:31 p.m.: despite multiple attempts, the EMS refused to accept the data. The log shows

Hash of election definition files from:			
Scanner	Memory Card	Initial Package	Revised Package
Banks (a)	ff03cbbb51cc3a5d	ff03cbbb51cc3a5d	ff03cbbb51cc3a5d
Central Lake (b)	c00dcf4ca35ef7f6	7b8591f6740fb8f5	c00dcf4ca35ef7f6
Chestonia	f391bbd613fdc6c4	f391bbd613fdc6c4	74a7117cfd151c4f
Custer	bb84f43854455a1e	bb84f43854455a1e	ba8ae12c2be863bd
Echo	0ee14f49f5791a81	0ee14f49f5791a81	34715b0f5e2f0023
Elk Rapids 1	c02565674b0f5c98	c02565674b0f5c98	20070f5cbd169c97
Elk Rapids AV	112ec69d110e5a3b	112ec69d110e5a3b	e7eec7a46e512890
Forest Home	f78c3d04faf939d3	f78c3d04faf939d3	87619945510c2734
Helena	506f34c5dafa9089	506f34c5dafa9089	df345e890f6790ac
Jordan	564abac2dddfc0d	564abac2dddfc0d	ee2ed5c613862e05
Kearney	b21d1803326105b7	b21d1803326105b7	103428ac3f693dfe
Mancelona 1 (c)	1a98842abe440234	820b4e24a3794af3	1a98842abe440234
Mancelona 2 (c)	f7261e8ce3d4e2f2	5de5f2843b9791f9	f7261e8ce3d4e2f2
Milton 1	d6707193f98ac434	d6707193f98ac434	13eafaa33fe413d1
Milton AV	f12ae9d71f3e56fe	f12ae9d71f3e56fe	b61c12678d3e9279
Star	8137bf3b0ddc8769	8137bf3b0ddc8769	77c67db8aa97ef02
Torch Lake	2f2de2a0f8bfdbb8	2f2de2a0f8bfdbb8	b45c508fae9aa39f
Warner	850d06f4a744f588	850d06f4a744f588	3eb6246c63c5d88a

Notes: (a) Definition is same in both packages; (b) Used initial definition Nov. 3 but rescanned Nov. 6 with revised definition; (c) Revised definition loaded before Nov. 3.

Table 3: **Scanner Election Definitions.** Only four of 18 scanners (Banks, Central Lake, Mancelona 1 and 2) used election definitions that matched the revised election package. Each entry shows the truncated SHA-256 hash of the election definition files. Matching hashes (*highlighted*) indicate files that are identical.

that after successfully loading two further cards, at 11:03 p.m. a staffer began manually entering the Warner results from the poll tape. At 12:28 a.m., the EMS was unable to load any votes from the card from Elk Rapids Precinct 1, although there was no problem with the Elk Rapids AV Board card. At 12:39 a.m., the EMS similarly was unable to load votes from the card from Milton Precinct 1 even though the Milton Township AV Board card had loaded normally. The EMS operator manually entered the results from these scanners. In all, 15 of the 18 cards loaded successfully, and three failed to load and were entered manually. The last card was loaded at 3:44 a.m. and the EMS generated the initial unofficial results report at 4:09 a.m. This report was printed, scanned, and uploaded to the county website [3].

Antrim’s timeline states that it received the first reports of errors in the initial results early the next morning, around 8:15 a.m. on November 4 [2]. The county confirmed that the totals were widely inconsistent with the poll tapes, took down the published results, and began manually entering results from the poll tapes for the affected scanners that had not already been entered manually.

Nov. 3	21:48	<i>EMS begins loading results from scanner memory cards.</i>	
	21:49	Chestonia Township	Card loaded successfully.
	22:31–22:38	Warner Township	Failed to load, 7 attempts.
	22:41	Banks Township	Card loaded successfully.
	22:53	Echo Township	Card loaded successfully.
	22:56	Warner Township	Final failed loading attempt.
	23:03–00:18	Warner Township	Manually entered from poll tape.
Nov. 4	00:20	Helena Township	Card loaded successfully.
	00:23	Star Township	Card loaded successfully.
	00:26	Custer Township	Card loaded successfully.
	00:28	Elk Rapids, Precinct 1	Failed to load.
	00:31	Elk Rapids, AV Board	Card loaded successfully.
	00:34	Torch Lake Township	Card loaded successfully.
	00:36	Forest Home Township	Card loaded successfully.
	00:38	Milton Township, AV Board	Card loaded successfully.
	00:38	Milton Township, Precinct 1	Failed to load.
	01:10–01:41	Elk Rapids, Precinct 1	Manually entered from poll tape.
	01:43	Central Lake Township	Card loaded successfully.
	01:48–02:04	Milton Township, Precinct 1	Manually entered from poll tape.
	02:05	Jordan Township	Card loaded successfully.
	03:36	Kearney Township	Card loaded successfully.
	03:43	Mancelona, Precinct 1	Card loaded successfully.
	03:44	Mancelona, Precinct 2	Card loaded successfully.
	03:51–04:09	<i>EMS produces unofficial results report for public distribution.</i>	

Table 4: **Election Night Timeline.** The EMS log shows that county staff worked through the night of Nov. 3–4 to load results from scanner memory cards. Three of 18 cards failed to load, and those results were entered manually from scanner poll tapes. At 4:09 a.m., the EMS produced the unofficial results report posted on Antrim’s website. Officials learned hours later that the results were erroneous.

3.3 How the Voting System Represents Ballots and Votes

Antrim County and the Bureau of Elections have explained that the major discrepancies in the initial results were caused by the use of mismatched election definitions on the EMS and on some of the county’s scanners [23]. To verify this, I first determined how Democracy Suite internally represents data about ballot designs, voted ballots, and election results.

Election Event Designer (EED) is the component of the D-Suite EMS software used to generate ballot layouts and election definition files [8]. Election workers use EED to define *contests* and associated *choices* (e.g., candidates), then assign each contest to one or more *polling districts*. Some precincts consist of only one district, but others are split into multiple polling districts with different local contests, e.g., if portions of the precinct fall within different school districts. Based on this data, EED automatically generates the election definition and ballot design for each polling district [8].

Internally, Democracy Suite represents the structure of the ballots using a collection of database tables. Each row in the **BallotManifestation** table corresponds to the ballot design used in a particular polling district; each row in the **ContestManifestation** table represents an instance of a contest appearing on a particular ballot design; and each row in the **ChoiceManifestation** table represents an instance of a choice appearing on a particular ballot design.

Every row in these tables is associated with a numeric identifier called the **internalMachineld**. When EED generates election definitions, it automatically assigns sequential **internalMachineld** numbers to every ballot design, to every contest, and to every choice, across all polling districts. These sequences continue from one polling district to the next, in alphabetical order. For instance, in the initial election definition, the **ChoiceManifestations** for “Central Lake Township, Precinct 1V” are assigned **internalMachineld** 820–961 and those for “Chestonia Township, Precinct 1C7AL” (the alphabetically-next polling district) are assigned **internalMachineld** 962–1091. The other two tables follow the same pattern.

Each memory card is loaded with a subset of the election definition data. For each ballot design used in the polling place, this data specifies the coordinates of each voting target and the **internalMachinelds** of the corresponding **ChoiceManifestation**, **ContestManifestation**, and **BallotManifestation**. The memory card also contains names of the choices and contests and other data necessary to count the votes, such as the maximum number of selections allowed in each contest and the party affiliations of the choices in contests where straight-party voting applies. This allows the scanner to tally the results itself and produce the poll tape.

The memory cards record results in two ways. First, each card contains a file with a name ending in **_TOTALS.DVD** that stores the scanner’s tallies. A second file, with a name ending in **_DETAIL.DVD**, stores the scanner’s interpretation of each ballot, which is known as a cast-vote record or CVR. It records whether or not the scanner detected a mark for each voting target on each contest on each ballot. These files do not contain the names of the contests and candidates. Instead, each result or selection is associated with the **internalMachinelds** of the

corresponding **BallotManifestation**, **ContestManifestation**, and **ChoiceManifestation** from the scanner’s copy of the election definition.

When the EMS loads results from the memory card, it interprets these files using *its* copy of the election definition. As long as the scanner and the EMS use copies of the same election definition, the files should be read correctly—as will normally be the case when they are properly configured. However, the EMS does not verify that the election definitions actually are the same. When they are different—as was the case in Antrim County for scanners that were not updated after the ballot design changes—this can lead to inaccurate results.

3.4 Effects of the Ballot Design Changes

The election project log shows that when Antrim requested the last-minute corrections to the ballot designs, ElectionSource modified the election project in EED and regenerated the ballot layouts and election definitions. I followed the same steps, and the only indication given by the EMS software that the changes might cause problems was a notice that “All previously created and deployed election files will be unusable”. The software did not warn that use of the old files could potentially lead to inaccurate results. Antrim *did* use the previously deployed election definition files in 16 of 18 scanners, which caused result data from the scanners to be incorrectly interpreted by the EMS.

The way that ElectionSource regenerated the election definitions had the side-effect of assigning different **ChoiceManifestation** identifiers to most voting targets throughout the county, while leaving the **BallotManifestation** identifiers and most of the **ContestManifestation** identifiers the same. This rendered the revised election definitions subtly incompatible with those that had already been deployed. I compared the databases from the initial and revised election projects to determine precisely how the ballot design changes affected these identifiers.

Correcting the school board contest in Central Lake required adding a write-in blank. When EED regenerated the election definitions, this addition caused the **ChoiceManifestation** numbers assigned to all subsequent voting targets to increase by one. This affected all choices in later contests on the Central Lake Precinct 1V ballot and all choices in all contests for alphabetically later townships.⁵

These changes to the identifiers, coupled with the county’s failure to update the memory cards in most scanners, caused the major errors in the initial unofficial results. Figure 2 illustrates what went wrong. Scanners using the initial election definition recorded votes to the memory cards using the old **ChoiceManifestation** numbers. The EMS interpreted the data using the revised election definition and the new **ChoiceManifestation** numbers. Where these identifiers differed, the EMS assigned the votes to the wrong candidates. If the voter marked the first choice in an affected contest, the **ChoiceManifestation** identifier was no longer associated with the same **ContestManifestation** under the revised election definition, and the

⁵This explains why the election definition for Banks Township did not change: “Banks” comes before “Central Lake” in alphabetical sequence.

**Central Lake, Precinct 1V
Initial Ballot Definition**

Local School District	
Board Member Ellsworth Schools <small>Vote for not more than 2</small>	
952	Mark Edward Greenink
953	Christopher Wallace
954	
955	

Proposal Section

State

Proposal 25-1
A proposed constitutional amendment to allow the State Parks Endowment Fund to continue receiving money from sales of oil and gas from state-owned lands to improve, maintain and purchase land for State parks, and for Fund administration. Its balance reaches \$800,000,000.

This proposed constitutional amendment would:

- Allow the State Parks Endowment Fund to continue receiving money from sales of oil and gas from state-owned lands to improve, maintain and purchase land for State parks, and for Fund administration. Its balance reaches \$800,000,000.
- Require at least 25% of Trust Fund annual spending go toward parks and public recreation areas and at least 25% toward land conservation.

Should this proposal be adopted?

956 Yes
957 No

**Central Lake, Precinct 1V
Revised Ballot Definition**

Local School District	
Board Member Central Lake Schools <small>Vote for not more than 2</small>	
952	Melanie Eckhardt
953	Keith Shieler
954	
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Proposal Section

State

Proposal 26-1
A proposed constitutional amendment to allow the State Parks Endowment Fund to continue receiving money from sales of oil and gas from state-owned lands to improve, maintain and purchase land for State parks, and for Fund administration. Its balance reaches \$800,000,000.

This proposed constitutional amendment would:

- Allow the State Parks Endowment Fund to continue receiving money from sales of oil and gas from state-owned lands to improve, maintain and purchase land for State parks, and for Fund administration. Its balance reaches \$800,000,000.
- Require at least 20% of Endowment Fund annual spending go toward State park improvement.
- Require at least 25% of Trust Fund annual spending go toward parks and public recreation areas and at least 25% toward land conservation.

Should this proposal be adopted?

957 Yes
958 No

(1) The Central Lake, Precinct 1V ballot was modified to reflect the correct school board contest. This necessitated inserting an additional write-in blank.

(2) The insertion incremented the ID number of every subsequent voting target.

(3) In alphabetically later townships, the change in Central Lake incremented the ID for every choice.

(4) A scanner using the initial definition records this Trump vote as ID 970. The EMS, using the revised definition, reports ID 970 as a vote for Biden.

OFFICIAL BALLOT
General Election
Tuesday, November 3, 2020
Antrim County, Michigan
Chestonia Township, Precinct 1C7AL

Partisan Section

Straight Party Ticket
Vote for not more than 1

962	963	Democratic Party
963	964	Republican Party
964	965	Libertarian Party
965	966	U.S. Taxpayers Party
966	967	Working Class Party
967	968	Green Party
968	969	Natural Law Party

Presidential

Electors of President and Vice-President of the United States
Vote for not more than 1

969	970	Joseph R. Biden Kamela D. Harris Democrat
970	971	Donald J. Trump Michael R. Pence Republican
971	972	Jo Jorgensen Jeremy Cohen Libertarian

Figure 2: Explaining the Major Reporting Discrepancy. D-Suite automatically assigns sequential ID numbers to voting targets across every ballot style. Correcting the ballot design for Central Lake Village required adding a write-in blank, which increased the ID number of every subsequent voting target by 1, including all targets in alphabetically later townships. Scanners in most precincts used the initial election definition (from before the change) and recorded votes under the old ID numbers. The EMS interpreted these ID numbers using the revised election definition, causing it to assign the votes to the wrong candidates.

EMS ignored the selection. A mark for any other choice was interpreted by the EMS as a mark for the choice above it on the ballot.

The changes to the other two ballot designs were less significant for reporting. The correction in Mancelona Township left the number of choices the same, so it did not change the identifier sequence. In Warner Township Precinct 1BF, the addition of the missing Sinking Fund contest increased the identifiers of later `ChoiceManifestations` and `ContestManifestations`. However, since Warner was the last township alphabetically, and its results were entered manually on election night, these changes had no effect on reporting.

3.5 Why Cards Failed to Load

In order to understand what the EMS operator saw when loading the memory cards on election night, I followed the same steps, loading the memory card data using the D-Suite RTR application running on a copy of the EMS. The Warner Township card resulted in a generic error message, “Failed to load [filename].” The Elk Rapids 1 and Milton 1 cards resulted in a somewhat similar looking warning message with different text, “Result file [filename] has not been closed. Result file will be loaded.” Despite this message, no votes were loaded from either card. For all the other cards, the EMS reported, “Result file [filename] was loaded successfully.” This message appeared even for cards which were loaded incorrectly due to the mismatched election definitions.

I investigated why the three memory cards failed to load. The EMS error log shows that the Warner Township card failed to load because of the mismatched election definitions. Unlike in the other townships where ballot designs changed, in Warner, there was a contest added to the ballot. This increased the identifiers for subsequent `ContestManifestations`, including those in later polling districts in Warner Township. Consequently, the Warner memory card contained votes for which the `ContestManifestation` identifiers were no longer associated with the same `BallotManifestation` under the revised election definition. The EMS apparently detected this inconsistency and refused to load the card.⁶

The Elk Rapids 1 and Milton 1 memory cards failed to load for a different reason: they did not contain any election results. To determine why, I examined the scanner logs on those cards. As shown in Figure 3, the logs indicate that on election night, after closing the polls and printing poll tapes, workers in these townships commanded the scanners to “re-zero” their memory cards, discarding the results and resetting the cards to a pre-election state.

Re-zeroing the cards is a significant deviation from normal election procedures. Although the poll tape contains a record of the scanner’s totals, manually entering the results is a laborious (and error-prone) process. Moreover, the data on the memory card is the primary electronic record of the votes and an important source of evidence if the integrity of the physical ballots is called into question.

⁶This is analogous to the situation in other townships where `ChoiceManifestation` identifiers were no longer associated with the same `ContestManifestation`. However, in those cases, the EMS loaded the cards and simply ignored the affected selections.

```

Nov 03/2020 06:46:02 *****
Nov 03/2020 06:46:02 * System Starting
Nov 03/2020 06:46:02 * Model Type PCOS-320C (Rev 1072)
Nov 03/2020 06:46:02 * Serial Number: AAFAJHX0109
Nov 03/2020 06:46:02 * Protective Counter: 5360
Nov 03/2020 06:46:02 * Software Version: 5.5.3-0002 #2 Fri Jul 27 09:18:31 CDT 2018
Nov 03/2020 06:46:02 * Election Project: Antrim November 2020
Nov 03/2020 06:46:02 *****
[...]
```

```

Nov 03/2020 06:47:54 Admin chose to Open Poll
Nov 03/2020 06:47:59 Printing 1 copy of ZERO TAPE
Nov 03/2020 07:22:26 Administrator declined to print another copy of ZERO TAPE.
Nov 03/2020 07:22:26 Poll Opened for Voting Location ID 6, Tabulator ID 6
[...]
```

```

Nov 03/2020 20:15:28 Total number of ballots = 1423.
Nov 03/2020 20:16:14 Administrator key for 'Admin' detected.
Nov 03/2020 20:16:14 Administrative Key inserted
Nov 03/2020 20:16:18 Admin chose to Close the Poll
Nov 03/2020 20:16:38 Correct passcode entered for Close.
Nov 03/2020 20:16:38 Requesting confirmation to close poll.
Nov 03/2020 20:16:49 Starting election database close poll procedure.
Nov 03/2020 20:16:49 Saving Poll-Close time.
Nov 03/2020 20:17:38 Beginning to create Total Results file.
Nov 03/2020 20:18:45 - Successfully created Total Results file
'/cflash/1120_6_6_0_TOTALS.DVD'.
Printing 1 copy of RESULTS TAPE
Nov 03/2020 20:21:44 Administrator chose to print another copy of RESULTS TAPE.
Nov 03/2020 20:21:45 Printing 1 copy of RESULTS TAPE
Nov 03/2020 20:24:57 Administrator chose to print another copy of RESULTS TAPE.
Nov 03/2020 20:24:57 Printing 1 copy of RESULTS TAPE
Nov 03/2020 20:29:11 Administrator chose to print another copy of RESULTS TAPE.
Nov 03/2020 20:29:11 Printing 1 copy of RESULTS TAPE
Nov 03/2020 20:31:53 Administrator declined to print another copy of RESULTS TAPE.
Nov 03/2020 20:31:53 Poll Closed for Voting Location ID 6, Tabulator ID 6
Nov 03/2020 20:32:59 Admin chose Utilities Options
Nov 03/2020 20:33:07 Admin chose to Rezero the Results.
Nov 03/2020 20:33:16 Correct passcode entered for Rezero.
Nov 03/2020 20:33:16 Start election database re-zero poll procedure.
Nov 03/2020 20:33:20 Comparing Raw Results files on primary and secondary cards...
Nov 03/2020 20:33:20 ... Raw Results files match.
Nov 03/2020 20:33:20 Comparing Detail Results files on primary and secondary cards...
Nov 03/2020 20:33:20 ... Detail Results files match.
Nov 03/2020 20:33:20 Comparing Write-in Image files on primary and secondary cards...
Nov 03/2020 20:33:20 ... Write-in Images files match.
Nov 03/2020 20:33:21 Image Partition reset.
Nov 03/2020 20:33:21 Results re-zeroed.
Nov 03/2020 20:33:32 Admin chose to Shutdown the Unit
Nov 03/2020 20:35:23 Shutdown system.
Nov 03/2020 20:35:24 >> DvsShutdown(fast:00000000).
Nov 03/2020 20:35:24 Creating total results file
Nov 03/2020 20:35:24 Beginning to create Total Results file.
Nov 03/2020 20:35:24 - Successfully created Total Results file
'/cflash/1120_6_6_0_TOTALS.DVD'.
Nov 03/2020 20:35:24 Total Results completed (rc=0)
Nov 03/2020 20:35:24 >> Shutting down AVS.
```

Figure3: **Memory Cards Mistakenly Re-zeroed.** Scanner logs from Elk Rapids Precinct 1 (*excerpt above*) and Milton Precinct 1 show that workers at both locations made a serious procedural error. After closing the polls and printing the poll tapes, they “re-zeroed” the memory cards, discarding the digital results and resetting the cards to a pre-election state. This explains why the EMS was unable to load the two cards, forcing results to be entered manually.

It is noteworthy that workers in separate polling places re-zeroed the memory cards almost simultaneously. Furthermore, this was not the first time that Antrim poll workers made this mistake. I examined the election project database from the previous election, in August 2020, which is present in the EMS image. During *that* election, the memory card for the Elk Rapids AV Board was re-zeroed and entered manually. This pattern of lapses suggests that there may be a serious deficiency in the poll worker training or documentation employed in the county.

These procedural errors may have contributed to the publication of incorrect results in November. Had the Elk Rapids and Milton cards loaded, the county-wide discrepancies would have been even more stark, making it more likely that county staff would have noticed before posting the report. Moreover, the EMS error message when loading the Warner Township card might have alerted the operator that there was a potentially serious problem, had not a superficially similar issue occurred in August for which the solution was simply to enter results manually. This appears to be an instance of “normalization of deviance”—aberrant practices coming to be considered harmless if they do not immediately cause a catastrophe—a phenomenon that has contributed to major disasters in aerospace and other industries [33].

3.6 Effects on the Presidential Contest

To further understand the effects of the mismatched election definitions, I closely examined how they impacted the initial results for the presidential contest.

The presidential candidates appeared in the same order on all ballots, beginning with Biden, Trump, and Libertarian Party candidate Jo Jorgensen. The ballots also contained a “Straight Party Ticket” option, for which the first three choices were the Democratic, Republican, and Libertarian parties. If the voter selected a party, that party’s presidential candidate would receive a vote unless the voter selected a presidential candidate from a different party or a write-in.

The initial presidential results from several scanners were unaffected by the election definition mismatch for various reasons:

- *Banks Township*. Since Banks comes first in alphabetical sequence—before the townships where the ballot designs were altered—its election definition did not change and initial results there were not affected.
- *Central Lake Township*. Although the modification to the school board race in Central Lake Village affected all subsequent contests, it occurred after every instance of the presidential contest in Central Lake Township, so the initial presidential results there were not affected.
- *Mancelona Township*. Mancelona was the only locality to have its memory cards provisioned with the revised election definition before the election, so the initial results in all contests there were loaded correctly by the EMS.
- *Elk Rapids 1, Milton 1, and Warner*. Since the EMS could not load these cards, results were entered manually and unaffected. (Initial results for the Elk Rapids and Milton AV Boards came from other scanners and *were* affected.)

	Final Results				Reproduced Error		Δ
	Biden	Trump	Jorgen.		Biden	Trump	
Banks	349	756	11	(a)	349	756	0 0
Central Lake	549	906	16	(a)	549	906	0 2
Chestonia	93	197	3	←	197	3	0 0
Custer	240	521	11	←	521	11	2 0
Echo	198	392	8	←	392	8	0 0
Elk Rapids 1	784	611	5	(b)	784	611	0 0
Elk Rapids AV	202	414	12	←	414	12	0 2
Forest Home	610	753	19	←	753	19	2 0
Helena	306	431	4	←	431	4	1 0
Jordan	183	371	13	←	371	13	1 0
Kearney	471	743	16	←	743	16	1 0
Mancelona 1	276	835	20	(c)	276	835	0 0
Mancelona 2	247	646	13	(c)	247	646	0 0
Milton 1	143	478	12	(b)	143	478	0 0
Milton AV	626	543	6	←	543	6	0 0
Star	161	462	10	←	462	10	0 0
Torch Lake	462	526	7	←	526	7	1 1
Warner	60	163	3	(b)	60	163	0 0
Total	5960	9748	189		7761	4504	8 5
Precinct notes: (a) IDs not shifted; (b) Entered manually; (c) Used updated card.							

Table 5: **Approximating the Erroneous Presidential Results.** A simple rule closely reproduces the erroneous initial presidential results. Working backwards from the final results (*left*), shift Trump’s votes into Biden’s column and Jorgensen’s votes into Trump’s (*right*), except for in precincts that were unaffected by the election definition mismatch for reasons noted. This yields totals that differ from the initial reported results by only 13 votes, or 0.1% (Δ).

The initial unofficial results from all other scanners were impacted in a consistent way, shown in Table 6. The EMS ignored selections for Biden, treated selections for Trump as selections for Biden, and treated selections for Jorgensen as selections for Trump. Other third-party candidates and write-ins were similarly shifted. The same pattern occurred with the straight-party option. Considering the effects on the straight-party and presidential selections together, the EMS ignored *most* votes intended for Biden, reported all votes intended for Trump as votes for Biden, and reported all votes intended for Jorgensen as votes for Trump.

This pattern lets us almost exactly reproduce the erroneous initial results from the final presidential results by simply shifting the totals for each candidate in the affected precincts, as shown in Table 5.⁷ Biden and Trump’s totals in

⁷In the table, I have split out the Elk Rapids and Milton AV boards from the rest of these townships using data from the EMS, since only the AV boards were affected.

	Voter Marks	Scanner Reads	EMS Interprets
Straight Party Ticket	Democratic	Democratic	<i>No selection</i>
	Republican	Republican	Democratic
	Libertarian	Libertarian	Republican
	U.S. Taxpayers	U.S. Taxpayers	Libertarian
	Working Class	Working Class	U.S. Taxpayers
	Green	Green	Working Class
	Natural Law	Natural Law	Green
President and Vice President	Biden	Biden	<i>No selection</i>
	Trump	Trump	Biden
	Jorgensen	Jorgensen	Trump
	Blankenship	Blankenship	Jorgensen
	Hawkins	Hawkins	Blankenship
	De La Fuente	De La Fuente	Hawkins
	<i>Write-in</i>	<i>Write-in</i>	De La Fuente

Table 6: **Misattributed Selections.** As a result of the mismatched election definitions, scanners that used the initial election definition read votes for most contests correctly, but when their memory cards were interpreted by the EMS using the revised election definition, selections were attributed to the wrong candidates. This table shows the effects in the straight-party option and presidential contest, but others were similarly affected.

Voter's Selection		EMS Interpretation		Voter Intended	EMS Reported
Party	President	Party	President		
<i>No selection</i>	Trump	<i>No selection</i>	Biden	Trump	Biden
X	Trump	X – 1	Biden	Trump	Biden
Republican	<i>No selection</i>	Democratic	<i>No selection</i>	Trump	Biden
Republican	Biden	Democratic	<i>No selection</i>	Biden	Biden
<i>No selection</i>	Jorgensen	<i>No selection</i>	Trump	Jorgensen	Trump
X	Jorgensen	X – 1	Trump	Jorgensen	Trump
Libertarian	<i>No selection</i>	Republican	<i>No selection</i>	Jorgensen	Trump
Libertarian	Biden	Republican	<i>No selection</i>	Biden	Trump

Table 7: **Votes Reported for Trump and Biden.** As a result of the mismatched election definitions, when the EMS interpreted memory cards from most scanners that used the initial election definition, Biden received the votes intended for Trump plus those of voters who selected the Republican straight-party option but split the ticket for Biden. Trump received the votes intended for Libertarian candidate Jo Jorgensen plus those of voters who selected the Libertarian straight-party option but split the ticket for Biden.

this reconstruction differ from the initial results by only 13 votes (0.1%). This demonstrates that the election definition mismatch caused the major errors.

The small differences between the reconstruction and the actual initial results are due to unusual cases not covered by the rule above. Ballots with both the Republican straight-party option and Biden selected were *correctly* reported as votes for Biden, because the EMS misinterpreted the candidate selection as blank but also misinterpreted the party selection as Democratic. Similarly, ballots marked for the Libertarian straight-party option and for Biden were reported as votes for Trump, since the EMS misinterpreted them as having the Republican Party selected with no selection in the presidential contest. Table 7 lists all cases in which the EMS attributed correctly marked ballots to Biden and to Trump.

The final circumstance in which the election definition mismatch caused the EMS to misreport presidential votes is for certain kinds of overvotes. If the voter made *two* selections in the straight-party option or the presidential contest, this should create an overvote condition and lead to both selections being ignored. However, if one of the marks was for the Democratic Party or Biden, the EMS ignored that mark but accepted the second mark as if it had been shifted one place up the ballot, leading to a complicated set of potential errors.⁸ Such overvotes were extremely rare in Antrim County. In Section 3.9, I confirm that correcting for the full effects of the election definition mismatch, including overvotes and split-ticket votes, exactly reproduces the anomalous initial presidential results.

3.7 Anomalies in the Second Results Report

To correct the errors caused by the mismatched election definitions, county workers manually entered results for all affected tabulators and published a second, partial set of unofficial results on November 5 [4]. However, these results were still badly erroneous, as shown in Table 1. Due to an operator error, totals for three precincts included *both* the manually entered results and the incorrect results loaded from the memory cards. This affected Custer, Echo, and the Elk Rapids AV Board. By manually the data in the EMS, I confirmed that the presidential results published on November 5 matched the sum of the results from the memory card and the manually entered results for these three scanners.

This was a simple mistake to make. From the operator’s perspective, the EMS stored each version of the precincts’ results as a separate “result file”. For most precincts, there was one result file that had been loaded from the memory card and a second that had been entered manually. To include result files in the reported results, the operator sets them to the “published” state. After adding the manual results, the operator should have set the memory card result files to a “rejected” state. However, the EMS log shows that this step was missed for the three scanners mentioned above.

⁸For example, ballots simultaneously marked for *both* the Democratic and Republican straight-party options would be misreported as votes for Biden if the presidential contest was marked in any of the following ways: Trump; Biden and Trump; any two candidates except Biden; any combination of three or more candidates; or nobody.

While manually entering the results, county staff discovered that the poll tape for Central Lake Village contained the wrong school board race, because the scanner memory card had used the initial election definition, from before the race was corrected. To fix the problem, county staff reinitialized the Central Lake memory card using the revised election definition, and the township used it to scan its ballots again on November 6 [2].

3.8 Data Entry Errors Corrected After Certification

The County Board of Canvassers certified the official results late on November 6, including the results from rescanning Central Lake. However, some contests in the original certified results from several precincts did not match the poll tapes as a result of data entry errors. The errors affected about 2.6% of votes county-wide.

Michigan canvassing procedures call for county canvassers to compare the reported results to the poll tapes from individual machines [17], so these errors should have been caught on November 6, but they were not. Checking the poll tapes is important not only for catching data entry errors, but also as a security mechanism. If results are carefully checked, it would be impossible for an attacker to manipulate results during transmission from the polling places, or by accessing the EMS after the election, without the changes being detected. That this comparison was not correctly completed by the canvassers in Antrim County is a significant procedural breakdown that warrants further investigation.

Antrim restated its certified results twice to correct the data entry errors:

1. On November 16, the county updated the certified results [6] to correct Kearney Township, Precinct 1T. The EMS shows that the manually entered results had omitted the U.S. Senate and Regent of the University of Michigan contests and the number of write-ins in the presidential contest.
2. On November 21, Antrim corrected further data entry errors across several more townships. Manually entered results in Chestonia Township, Precinct 1C7AL, had omitted the results for the State Representative contest and one school board candidate. In Custer Township, Precinct 1C5BE, the number of votes for two members of the State Board of Education had been transposed. In Milton Township, Precinct 1, results had been omitted for State Representative, State Board of Education, Trustee of Michigan State University, and a variety of county and local offices. In Star Township, Precinct 1, results for State Representative and County Sheriff had been omitted. In Elk Rapids, Precinct 1T, votes for a third-party U.S. Senate candidate had been omitted, as was the number of write-in votes in the State Representative race in Precinct 1V. Also in Elk Rapids, Precinct 1V, there were typographical errors in results for County Drain Commissioner candidate Mark Stone (468 instead of 488) and Village Trustee candidate Laura Shumate (163 instead of 168).

The County published the second amended certified results on November 21, and they remain the final results [7]. The Board of State Canvassers certified Michigan's state and federal results on November 23 [12].

3.9 Confirming that All Reporting Errors have been Corrected

I conducted a series of experiments to confirm that the explanations discussed above fully account for the discrepancies between the county-level results and the poll tapes and to verify that these discrepancies have been corrected.

Rectifying the Election Definition Mismatch

First, I used the EMS software to test whether loading the memory cards using a matching election definition would produce the reported results. I restored the initial election project from the first election package, thus ensuring that the EMS was using the initial election definitions. I then used RTR to load the memory cards from all scanners that had used the initial election definition and for which electronic results were available. (That is, all but Central Lake and Mancelona 1 and 2, which scanned using the revised definition, and Elk Rapids 1 and Milton 1, where the cards were re-zeroed at the polling places.) These 13 cards loaded successfully, including Warner Township's, which had failed to load on election night under the revised election definition.

Using a series of SQL queries, I compared the results obtained in this way to the final certified results contained in the EMS database. The only discrepancy was that the Boyne Falls Public Schools Sinking Fund Millage appears in the reported results for Warner Township (with zero recorded votes) but is not present on the Warner memory card. I explain this discrepancy in Section 4.

Next, I restored the revised election project and loaded the Central Lake and Mancelona 1 and 2 memory cards under the revised election definition. I used further SQL queries to compare the loaded results in this way to the final certified results contained in the EMS database. There were no discrepancies.

These results demonstrate that using matching election definitions would have prevented the reporting anomalies. They also confirm that the manually entered results from the 16 scanners for which memory card data is available do not contain further data entry errors and match the results that would have been obtained from the memory cards.

Electronically Counting Votes without the EMS

In a second experiment, I created my own software to count the presidential results from the memory cards, without relying on the software from the EMS. This provides an independent check of the accuracy of the results aggregation.

Each memory card stores cast vote records (CVRs) in a file with a name ending in `_DETAIL.DVD`. The files are encrypted using AES in CBC mode, but the encryption key and initialization vector can be retrieved from the `ElectionEvent` table in the EMS database. I decrypted the files and determined the data format. Each voting target is represented by the associated `BallotManifestation`, `ContestManifestation`, and `ChoiceManifestation` identifiers and by a boolean value that indicates whether the scanner detected that the target was marked.

I wrote Python programs to extract the set of marked targets from each memory card and to count them using election definition data from either the initial or the revised election project database. Producing correct counts required several considerations:

1. First, the program checks the EMS database to verify that each marked `ChoiceManifestation` is in fact associated with the `ContestManifestation` and `BallotManifestation` indicated in the CVR. Otherwise, it ignores the mark completely. This appears to match the effects of database logic within the EMS and is necessary to reproduce the erroneous results.
2. Next, the program checks for overvotes by determining whether the number of valid marks in a given contest is greater than the allowed number of selections. If so, the contest is skipped and no votes are recorded.
3. Finally, the program applies Michigan’s straight-party voting rules to all partisan contests.

Using these programs, I first counted the CVRs on all cards using the revised election definition, mimicking the behavior of the EMS on election night. As expected, the presidential results were an exact match for the initial results for every scanner except Elk Rapids 1, Milton 1, and Warner, for which results were entered manually on election night, and Central Lake. (The Central Lake card was reused to scan the ballots again on November 5, and the presidential results from that card match the reported results of the rescan.) This confirms that the mismatched election definitions caused the major errors in the initial results.

Next, to undo the effects of the mismatched election definitions, I used the programs to count the CVRs for each card using the election definition version found on that card, as shown in Table 3. This provides a form of confirmation of the results that does not rely on the EMS’s counting and reporting logic. The presidential results exactly matched the final reported totals for every card that contained results data (i.e., all but Elk Rapids 1 and Milton 1). This further confirms that all reporting errors in the presidential contest have been corrected.

Manually Comparing the Reported Results to the Poll Tapes

As a final confirmation, I manually compared the final certified results [7] to copies of the poll tapes provided by the county.⁹ The results on the poll tapes for all contests in all precincts are correctly reflected in the final results. This confirms that the county-level reporting anomalies have been fully corrected.

⁹The final certified results as published on Antrim County’s website are missing pages 47–48 of the 185-page report. These contain part of the Banks Township Trustee contest and the Central Lake Township Supervisor contest. Other pages are out of order or duplicated, so this omission is likely the result of human error or a mechanical error while scanning the report for posting. Antrim provided the missing pages at my request.

4 Discrepancies in the Scanner Poll Tapes

The analysis in Section 3 firmly establishes that the major reporting anomalies on election night were caused by Antrim County’s failure to ensure that all scanners used the same election definition as the EMS. I also showed that the errors introduced during county-wide reporting have been corrected, and the final reported results match the poll tapes produced by the individual scanners.

However, the poll tapes from certain precincts themselves contain errors that affect smaller numbers of votes, mainly in specific down-ballot contests. These errors have a different pattern than the major reporting anomalies. In most precincts, the design of the printed ballots was not changed, and so the individual scanners counted normally whether they were using the initial or the revised election definition. But ballot designs *were* changed in parts of three townships—Central Lake, Mancelona, and Warner—and I show that the changes led to a small number of errors on poll tapes within these localities. I investigate what caused the poll tape errors, determine the effects, and show that certain errors affecting a small number of votes remain uncorrected in the final results.

4.1 Logic and Accuracy Testing

Logic and accuracy testing (L&A testing) is an important pre-election procedure that is intended to check that polling place equipment produces accurate poll tapes. In order to produce accurate counts, the scanners need to use election definitions that are properly prepared and that match the design of the ballots being scanned. Correctly performed L&A testing checks both. Although L&A testing cannot protect against sophisticated attacks on voting equipment [10], it *should* prevent both accidental and deliberate scanner configuration errors.

Michigan election procedures require L&A testing of all scanners and voter-assist terminals [19]. Workers use a “test deck”, a set of ballots marked in advance so that all voting targets are tested and the correct results are known. After scanning the test deck, they verify that the poll tape matches the expected results. Any deviations are a potential indication of an error in the election definition.

I examined the scanner logs from the memory cards to determine whether L&A testing occurred.¹⁰ Every scanner was tested before the election, as shown in Table 8. Notably, both Mancelona Township cards were tested after the cards were updated with the revised election definition. Although the Central Lake scanner was tested before election day, it was not tested again after the card was reinitialized with the revised election definition prior to the November 6 re-scan.

Despite the fact that every scanner was tested prior to election day, the testing was not successful at flagging certain problems. The poll tapes produced during testing in Central Lake and Warner townships reflected the initial ballot designs, so they contained an incorrect contest and were missing a contest, respectively. By the time the testing occurred, the county was aware of the ballot design errors,

¹⁰The original log for Central Lake was erased when the memory card was reinitialized for the November 6 re-scan, so I examined a copy of the log from the EMS database.

Scanner	L&A Test Dates	Number of Test Ballots
Banks	October 22	50, 256
Central Lake	October 23	128
Chestonia	October 19	262
Custer	October 24	256
Echo	October 14 and 21	192; 192
Elk Rapids 1	October 14 and 21	64, 64; 128
Elk Rapids AV	October 14, 21, and 29	64, 64; 128; 8
Forest Home	October 23	192
Helena	October 20	64
Jordan	October 28	192
Kearney	October 27	192
Mancelona 1	October 24	126
Mancelona 2	October 24	127
Milton 1	October 17	64, 64
Milton AV	October 17	64
Star	October 20	64
Torch Lake	October 21	64, 64, 64
Warner	October 20	64, 192

Table 8: **Logic & Accuracy Testing.** L&A testing checks that scanners produce correct poll tapes when tallying a “test deck” of ballots with known selections. Every memory card used on election day was tested at least once. In Central Lake and Warner, the testers should have flagged errors in the poll tapes but did not.

and so presumably were the townships. The workers who performed the testing may have either ignored these discrepancies or failed to review the test decks and poll tapes carefully enough to spot them. Had the townships reacted to these errors by updating their election definitions, it would have prevented some (but not all) of the residual anomalies described in this section.

Michigan only requires L&A testing at the local level. The Bureau of Elections recommends, but does not require, further tests to confirm that loading results from the scanner memory cards into the EMS produces correct results. The EMS logs confirms that no such testing was conducted in Antrim County. Had the county performed such “end-to-end” pre-election testing, it is likely that the effects of the mismatched election definitions would have been detected, and the county-level reporting anomalies might have been averted.

4.2 Use of Outdated Ballots and Election Definitions

The three townships where ballot designs were altered scanned ballots a total of four times: once in Warner using the initial election definition, once in Mancelona using the revised election definition, and twice in Central Lake using the initial and then the revised election definition. Two factors led to inaccuracies in particular down-ballot contests during these scans. First, the scans that used initial election definitions necessarily produced results that omitted contests or candidates that

were added when the ballot designs were revised. Second, some of the paper ballots that were scanned themselves used the outdated designs.

The last-minute ballot design changes in Central Lake, Mancelona, and Warner occurred after absentee voting had begun. For instance, according to Antrim County, 224 absentee ballots for Central Lake Village had been sent to voters before the change. Although these voters were later sent corrected ballots, some of them voted using the initial ballot designs.¹¹ There were procedures to ensure that voters did not return more than one ballot, but there was apparently no special process for handling the initial ballots that were received—they were scanned mixed together with the revised ballots.

This was problematic, because ElectionSource had regenerated the ballot designs in such a way that the initial and revised designs used the same ballot design identifiers. Normally, every ballot design has a unique identifier that allows the scanners to recognize it and correctly locate the voting targets, but there was no way for the scanners to distinguish between the two versions of the ballots where the design had changed. They treated them as if they were all using the initial design or as if they were all using the revised design, depending on which version of the election definition Antrim had loaded onto the memory card.

4.3 Effects in Warner Township

The ballot design for Warner Township, Precinct 1BF, was altered to add a missing contest, the Boyne Falls Public Schools Sinking Fund Millage Proposal, as shown in Figure 1c. The contest was added to the end of the last column of the ballot, so no other contests or voting targets were affected. However, as Warner scanner was never updated to read the revised ballot design, the votes in this contest were not read or reported by the scanner at all. The contest does not appear on the scanner poll tape and is not recorded on the memory card.

Only a small number of Warner Township voters live in the Boyne Falls School District and were eligible to vote in the Sinking Fund contest. The final results show that there were three registered voters and three ballots cast, but no “Yes” or “No” votes were recorded in the contest. Some voters may have left the contest blank, and any who voted absentee using the initial ballot design would have returned ballots that lacked the contest entirely. Therefore, we can conclude only that between zero and three votes in the Sinking Fund contest were never counted. This is too few votes to affect the outcome.

4.4 Effects in Mancelona

The Mancelona, Precinct 1V (Mancelona Village) ballot was revised to add a missing candidate for Village Trustee, Eugene K. Kerr. The contest also changed from vote-for-three to vote-for-two, so the effect was that Kerr replaced a write-in blank, and no other contests or choices changed position, as shown in Figure 1c.

¹¹There is also no indication that Central Lake, Mancelona, or Warner Township updated its voter-assist terminals (VATs) to reflect the revised ballot designs. If they did not, voters who used the VATs would have been presented with outdated ballots. However, according to Antrim County, no voters used the VATs in the affected townships.

Mancelona’s scanners used the revised election definition, but some absentee voters may have returned ballots that used the initial ballot design. Since the scanners were not configured to read the initial ballot design, if any of these voters selected the first write-in blank, the scanners would have misinterpreted the vote as a vote for Kerr. Likewise, if any of these voters selected three candidates, the votes would have been unexpectedly ignored as overvotes. The data I examined is insufficient to determine how many votes, if any, were affected by these cases. However, they are likely uncommon, and the Village Trustee contest was decided by a large margin, so they are unlikely to have altered the outcome.

4.5 Effects in Central Lake

The effects of the ballot design changes in Central Lake were considerably more complicated. Figure 1a shows how the ballot design in Central Lake Precinct 1V (Central Lake Village) was altered to correct the school board contest from Ellsworth Schools to Central Lake Schools. This changed the name of the contest and candidates and also the allowed number of selections, which increased from two to three. The increase necessitated an additional write-in blank, which shifted the position of the contest below, State Proposal 20-1, down by one row.

Central Lake used the initial election definition on election day, and results loaded from the memory card were included in the first unofficial results. The township then rescanned using the revised election definition on November 6, producing a second poll tape, which was manually entered as part of the certified results. Results in the three contests affected by the ballot design change differed dramatically between the two scans, as shown in the poll tape excerpts in Figure 4.

Although most of the voted ballots in Central Lake Village used the revised ballot design, a substantial minority used the initial ballot design. In neither scan was the scanner properly configured to read both versions of the ballot design simultaneously; as a result, both sets of scan results are partially incorrect with respect to certain down-ballot contests. Those that used the revised design were scanned incorrectly during the first scan, and those that used the initial design were scanned incorrectly during the second scan. I explain these errors below.

Errors in the Election Day Scan

Central Lake used the initial election definition on election day, but most voted ballots used the revised ballot design. This had several consequences for the accuracy of the poll tape. First, the school board contests were affected as follows:

1. Central Lake Village votes were incorrectly included in the Ellsworth Schools contest. For ballots that used the initial design, which incorrectly showed the Ellsworth contest, votes were counted towards this contest even though the voters were not eligible to vote in it. For ballots that used the revised design, which showed the correct Central Lake Schools contest, votes were incorrectly tabulated for the candidates in the equivalent ballot positions in the Ellsworth contest. Thus, Groenink received Eckhardt’s votes on the poll tape, and Wallace received Shafer’s votes.

School Board Member for Central Lake Schools (3)		School Board Member for Central Lake Schools (3)	
Melanie Eckhardt:	519	Melanie Eckhardt:	852
Keith Shafer:	525	Keith Shafer:	846
Write-in:	24	Write-in:	112
Total Votes:	1068	Total Votes:	1810

School Board Member for Ellsworth Schools (2)		School Board Member for Ellsworth Schools (2)	
Mark Edward Groenink:	333	Mark Edward Groenink:	3
Christopher Wallace:	320	Christopher Wallace:	3
Write-in:	10	Write-in:	0
Total Votes:	663	Total Votes:	6

State Proposal 20-1 (1)		State Proposal 20-1 (1)	
Yes:	774	Yes:	1083
No:	508	No:	296
Total Votes:	1282	Total Votes:	1289

(a) Election Day Scan (Nov. 3)

(b) Second Scan (Nov. 6)

Figure 4: Central Lake Poll Tapes. Central Lake scanned twice: on election day using the initial election definition and on November 6 using the revised election definition. The poll tapes from the second scan showed large differences in three contests, excerpted above, due to the changes in the election definition. Although the second scan is closer to the correct results, my analysis shows that the Central Lake School Board and State Proposal 20-1 results are still in error.

2. On ballots that used the revised design, any write-in selections that used the third write-in blank were ignored, since there was no voting target in that position in the initial ballot design. These were not reflected in the election-day poll tape or on the memory card.
3. The revised ballot design allowed up to three votes for school board. However, since the initial design had only allowed up to two, if a voter selected three candidates, other than by using the third write-in blank, the scanner ignored all the selections as if the contest had been overvoted, and they were not included in the poll tape.

The poll tapes in Figure 4 reflect these errors. The numbers shown for each school board contest are the total number of votes received in all precinct splits in Central Lake: 1V (Central Lake Village), 1CENT (Central Lake Schools), and 1ELS (Ellsworth Schools, which has only a small number of voters). As a result of the changes to the election definition, in the first scan, school board votes from 1V were included in the Ellsworth totals, and in the second scan, they were included in the Central Lake totals. Thus the second scan total for each of the two Central Lake Schools candidates approximately equals the sum of the votes in the first scan for the Central Lake and Ellsworth candidates in the equivalent position.

Due to the election definition mismatch between the EMS and scanner, the election night results from the EMS were also wrong for these contests, but in a different way than the poll tapes. The memory card used the initial election definition, but the EMS used the revised election definition. Both election definitions used the same **ContestManifestation** identifier for the Central Lake Village school board contest and the same **ChoiceManifestation** identifiers values for the four voting targets that were present in both ballot designs. Thus, ballots that used the revised ballot design and only included marks among the first four choices were reported *correctly* by the EMS. Those on which the fifth choice (the third write-in blank) was selected were interpreted incorrectly, since the scanners did not record marks for this target. Ballots that used the initial design (with the Ellsworth contest) were also interpreted incorrectly by the EMS, with votes counted towards the Central Lake Schools candidates in equivalent positions.

The first Central Lake poll tape also contains incorrect results for State Proposal 20-1. In the revised ballot design, the voting target for “Yes” is in the same position as the target for “No” was in the old design, and the target for “No” is in a position that was unused in the old design, as depicted in the left half of Figure 5. In the first scan, the scanner used the initial election definition. This caused it to misread Proposal 20-1 selections for ballots that used the revised design. For these ballots, the poll tape reported “Yes” votes as “No” and failed to record “No” votes at all. Ballots using the initial design were read correctly.

When the EMS loaded the memory card from the first scan, Proposal 20-1 votes were additionally affected by the election definition mismatch. The net effect was that *both* ballots using the initial design that were marked for “No” *and* ballots using the revised design that were marked for “Yes” were reported by the EMS as votes for “Yes,” and all other selections were ignored.

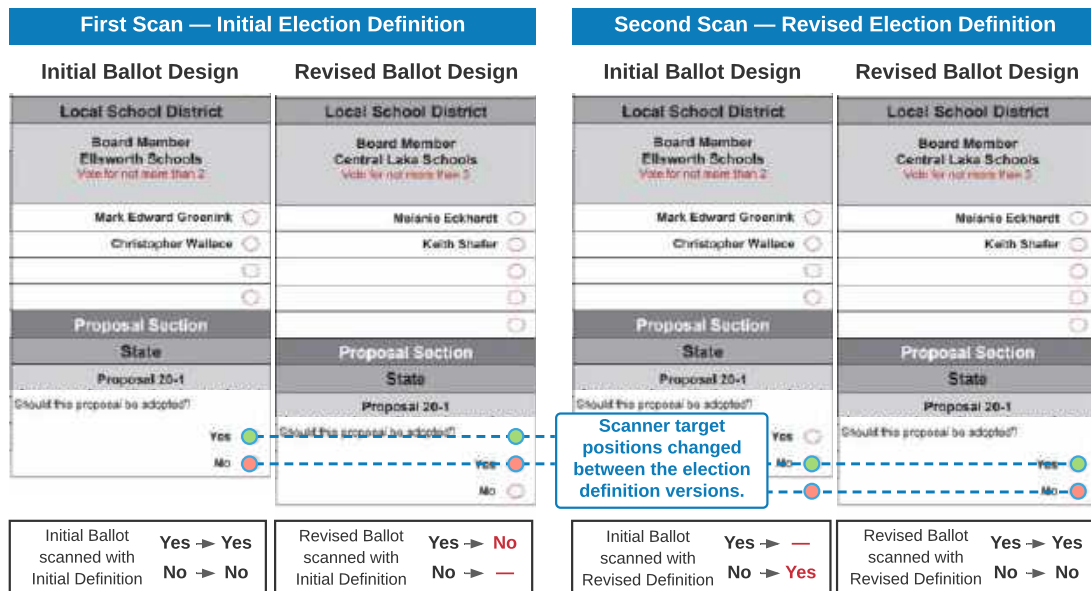


Figure 5: **How State Prop. 20-1 was Scanned in Central Lake Village.** Central Lake scanned ballots twice, once with the initial election definition (*left*) and again with the revised definition (*right*). Some ballots used the initial design and others used the revised design, with targets for Prop. 20-1 shifted down by one row. In both scans, Prop. 20-1 selections on ballots that did not match the election definition in use were miscounted (as shown in boxes at bottom).

Errors in the November 6 Scan

Central Lake completed a second scan on November 6, using the revised election definition. This time, ballots that used the revised design were counted correctly, but ballots from Central Lake Village that used the initial design were partially misinterpreted, because the scanner was not configured to read them correctly.

The school board race was affected as follows:

1. The initial ballot design showed the wrong school board contest (Ellsworth). The scanner interpreted these ballots as if they had votes for the Central Lake Schools contest. Votes for Groenink were interpreted as votes for Eckhardt, votes for Wallace were interpreted as votes for Shafer, and votes in the first two write-in blanks were interpreted as write-ins.
2. The position of the voting target for the third write-in blank in the revised ballot design lined up with the position of the darkly shaded "Proposal Section" header on the original ballot. The scanner likely misinterpreted this header as a mark in the third write-in target. The memory card records 10 write-ins cast using the first blank, 4 using the second, and 74 using the third.

Choice	Poll Tape		Choice	Ballot Design		Total	Δ
	First	Second		Initial	Revised		
Yes	61	370	Yes	61	$a \approx 359$	420	+50
No	371	69	No	$b \approx 11$	69	80	+11

Table 9: **Remaining Errors in State Prop. 20-1.** Some voters in Central Lake Village cast ballots using the initial ballot design. Their votes in State Prop. 20-1 were counted incorrectly when the ballots were scanned using the revised election definition. My estimate (*blue*) is that approximately 61 votes are not incorporated in the final results for this contest: 50 for “Yes” and 11 for “No”.

Since voters usually use earlier write-in blanks before later ones, this strongly suggests that at least 70 ballots used the outdated ballot design.

State Proposal 20-1 was affected too during the second scan. This time, voters who used the initial ballot design had their Proposal 20-1 votes misinterpreted, as shown on the right side of Figure 5. Those who selected “Yes” had the votes ignored, and those who selected “No” were counted for “Yes”. Since the final reported results match the poll tapes, these errors have not been corrected.

Estimating the Size of the Error for State Proposal 20-1

The two scan results from Central Lake provide enough information to estimate the number of ballots that used the initial ballot design and the size of the errors.

The first poll tape, based on the initial election definition, showed 61 votes for “Yes” and 371 for “No” from Central Lake Village. Per Figure 5, the “Yes” votes would have been only those marked for “Yes” and using the initial ballot design, while the “No” votes would have been those marked “Yes” using the initial ballot design plus those marked “No” using the revised ballot design. The second poll tape, based on the revised election definition, shows 370 votes for “Yes” and 69 for “No”. Votes counted for “Yes” would have been those marked “Yes” using the revised ballot design plus those marked “No” using the initial ballot design. Those counted for “No” would have been only those marked “No” using the revised ballot design.¹²

We can use these facts to estimate the results without the error. Let a be the number of votes for “Yes” cast using the revised ballot design, and let b be the number for “No” cast using the initial ballot design. Based on the facts above, $a + b \approx 370$. In the rest of Central Lake Township, which was unaffected by the error, “Yes” received 84% of the votes. Under the assumption that Central Lake Village voted for each option in the same proportion:

$$\frac{61 + a}{(61 + a) + (b + 69)} \approx 84\%$$

¹²This implies that the 371 and 370 counts should be equal. The difference is due to one of the three ballots that were not included in the second scan, as discussed in §4.6.

By simple algebra, $a \approx 359$ and $b \approx 11$. This implies that approximately $61 + 11 = 72$ votes were cast using the initial ballot design, and that approximately $50 + 11 = 61$ votes are not incorporated in the final results for the contest. Table 9 summarizes this analysis.

Since State Proposal 20-1 was decided by a margin of more than 3 million votes, the error could not have affected the outcome.

4.6 Additional Discrepancies in the Central Lake Scans

Beyond the discrepancies noted above, the poll tapes from the two Central Lake scans show a large number of smaller differences. Many contests have one or two fewer votes in the second scan. One of these differences potentially affected the outcome of a contest. As shown in Figure 6, in the first scan, the Central Lake Village Marihuana Retailer Initiative was tied (and thus defeated), but in the second scan, which became the final result, it passed by a single vote.

The data I examined suggests that three ballots that were included in the first scan were omitted when the ballots were scanned again, either correctly or due to human error. The scanner log from election day, as recorded in the EMS database, shows that 1494 ballots were scanned. Yet the log from the memory card shows that only 1491 ballots were scanned on November 6. The memory card from the first scan was overwritten to prepare it for the second scan, so the original digital records of the ballots are not available. However, the EMS database contains

A Proposed Initiated Ordinance to Authorize One (1) Marihuana Retailer Establishment Within the Village of Central Lake (1)	
Yes:	262
No:	262
Total Votes:	524

(a) Election Day Scan (Nov. 3)

A Proposed Initiated Ordinance to Authorize One (1) Marihuana Retailer Establishment Within the Village of Central Lake (1)	
Yes:	262
No:	261
Total Votes:	523

(b) Second Scan (Nov. 6)

Figure 6: Central Lake Village Marihuana Retailer Initiative. In this local contest, the poll tapes differ by one vote—enough to change the outcome. The data suggests that three ballots that were scanned on Nov. 3 were omitted when the ballots were re-scanned on Nov. 6, either correctly or due to human error.

<p align="center">Ballot 1 — Central Lake Township, Precinct 1CENT</p> <p>President and Vice President of the United States : Donald J. Trump / Michael R. Pence United States Senator for State : John James Representative in Congress 1st District : Jack Bergman Representative in State Legislature 105th District : Ken Borton Member of the State Board of Education : Tami Carlone, Michelle A. Frederick Regent of the University of Michigan : Sarah Hubbard, Carl Meyers Trustee of Michigan State University : Pat O'Keefe, Tonya Schuitmaker Governor of Wayne State University : Don Gates County Prosecuting Attorney : Write-in County Sheriff : Write-in County Clerk : Sheryl Guy County Treasurer : Sherry A. Comben County Register of Deeds : Patty Niepoth County Drain Commissioner : Mark Stone County Surveyor : Scott Papineau County Commissioner 2nd District : Joshua E. Watrous Township Supervisor for Central Lake Township : Write-in Township Clerk for Central Lake Township : Judy Kosloski Township Treasurer for Central Lake Township : Andrew Smith Township Trustee for Central Lake Township : Patrick Hanlon, Pat Marshall Justice of Supreme Court : Katherine Mary Nepton, Brock Swartzle Judge of Court of Appeals 4th District Incumbent Position : Michael J. Kelly, Amy Ronayne Krause Judge of Court of Appeals 4th District Non-Incumbent Position : Michelle Rick Judge of Circuit Court 13th Circuit Incumbent Position : Kevin A. Elsenheimer Board Member for Charlevoix-Emmet Intermediate School District 6 Year Term : Thelma A. Chellis State Proposal 20-1 : Yes State Proposal 20-2 : Yes</p>
<p align="center">Ballot 2 — Central Lake Township, Precinct 1V</p> <p align="center">[*No selections.]</p>
<p align="center">Ballot 3 — Central Lake Township, Precinct 1V</p> <p>Straight Party Ticket : Republican Party President and Vice President of the United States : Donald J. Trump / Michael R. Pence United States Senator for State : John James Representative in Congress 1st District : Jack Bergman Member of the State Board of Education : Tami Carlone, Michelle A. Frederick Regent of the University of Michigan : Sarah Hubbard, Carl Meyers Trustee of Michigan State University : Pat O'Keefe, Tonya Schuitmaker County Prosecuting Attorney : James L. Rossiter County Sheriff : Daniel S. Bean County Clerk : Sheryl Guy County Treasurer : Sherry A. Comben County Register of Deeds : Patty Niepoth County Commissioner 2nd District : Joshua E. Watrous Township Supervisor for Central Lake Township : Stanley A. Bean Village President for Village of Central Lake : Rob Tyler Village Trustee for Village of Central Lake : Bill Chapman * School Board Member for Central Lake Schools : Melanie Eckhardt, Keith Shafer * State Proposal 20-1 : — * State Proposal 20-2 : — * A Proposed Initiated Ordinance to Authorize One (1) Marihuana Retailer Establishment Within the Village of Central Lake : No</p>

* indicates contests that are potentially incomplete due to limited data.

Figure 7: Reconstructed Omitted Ballots from Central Lake. This figure shows selections registered by the scanner on Nov. 3 for three ballots that were not included when the ballots were scanned again on Nov. 6. It is possible that these ballots were properly excluded due to some disqualifying defect. However, if Ballot 3 was valid and omitted due to human error, it is likely that the outcome of the Central Lake Village Marihuana Retailer Initiative is incorrect.

CVRs derived from the original memory card, in the `CastVoteRecord` table. Using this data, I was able to reconstruct the scanner’s interpretation of the three ballots.

The CVRs in the EMS record the *EMS’s interpretation* of each ballot, which was sometimes affected by the election definition mismatch. Within Central Lake, only ballots from Central Lake Village are affected, and then only particular contests. Selections for the third write-in blank in the school board contest were never recorded. In subsequent contests, selections for the first choice were never recorded, and those for any later choice were assigned to the preceding choice.

I extracted the CVRs for the first scan from the EMS database and corrected for the election definition mismatch. I also extracted the CVRs for the second scan from the memory card. Every ballot from the first scan also appears in the second scan, except for three ballots. My reconstruction of these is shown in Figure 5.

The first ballot is from Central Lake Precinct 1CENT; the reconstruction is complete, since this precinct was not affected by the election definition mismatch. The second ballot is from Central Lake Village and so would have been affected by the mismatch, but it was recorded by the EMS as blank. Since it is implausible that the voter marked only choices that would have been omitted under the EMS’s interpretation, the ballot very likely had no readable selections.

The third ballot is also from Central Lake Village. The contests marked with an asterisk in Figure 5 are potentially missing certain selections due to the election definition mismatch. For the school board contest, the reconstruction is likely correct; neither of the first two write-ins was selected, so the third probably was not either. The EMS did not record selections for State Proposal 20-1 or 20-2, but it is impossible to determine whether this is because the scanner detected a mark for “Yes”, which would have been omitted by the EMS, or because there was no detected selection. Finally, the data indicate that the scanner detected a mark for “No” in the Central Lake Village Marihuana Retailer Initiative.¹³

The data supports the conclusion that these three ballots fully account for the residual differences between the poll tapes from the two scans. There are multiple possibilities for why they were not included in the second scan. While it is possible that they were ruled invalid due to some defect and properly excluded, it is also possible that elections staff simply did not scan them the second time, due to human error. If these ballots are valid, it is likely that the final reported outcome of the Central Lake Village Marihuana Retailer Initiative is incorrect and that the true result is a tie, as shown on the election day poll tape.

4.7 Results of the Presidential Hand Count

On December 17, the State Bureau of Elections conducted a county-wide hand-count of the presidential contest [21]. It provides strong empirical evidence that there are no significant errors in Antrim County’s final reported presidential results. The results [20] showed a loss of 1 vote for Biden, a gain of 12 votes for Trump, and gains of 1 vote for each of three third-party candidates. Although

¹³While it is possible that there was also a mark for “Yes”, which would not have been recorded due to the election definition mismatch, such overvotes are uncommon.

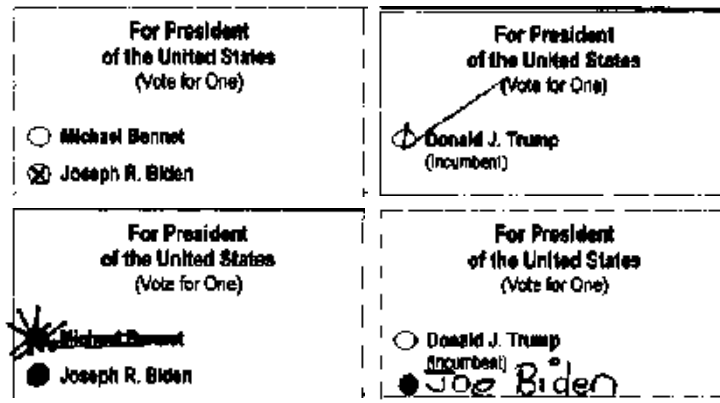


Figure 8: **Examples of Marginal Marks.** Hand counts often produce slightly different results from machine counts due to “marginal marks”, instances where voters fill in voting targets incompletely or otherwise deviate from the ballot instructions. These images, from ballots cast in Georgia’s 2020 partisan primaries, illustrate instances where a human might count the vote differently than would a scanner that simply measures shading within the voting target ovals.

Trump’s total changed by more than any other candidate’s, it differed from the county’s final reported result by only about 0.1%. (Trump lost state-wide by 2.8%.)

The precinct-level totals closely matched the scanner results. Within individual precincts, Trump and Biden’s results changed by at most three votes, except in Star Township, where Biden gained 5 votes and Trump gained 6. Eight precincts showed no change for either Trump or Biden, and six (including Central Lake and Warner) showed no net change for any candidate.

Small differences are common when ballots are counted by hand. Sometimes workers counting ballots make mistakes. Humans also interpret some votes differently than optical scanners, which merely sense the intensity of shading within the voting targets. Scanners can misread votes when voters incompletely fill-in voting targets or otherwise deviate from ballot instructions, as illustrated in Figure 8. Such “marginal marks” can cause scanners to fail to count a valid vote, count an invalid vote, or assign a vote to the wrong candidate.

Notably, the hand-count results from Central Lake agree with the results of the township’s second scan, which found 906 votes for Trump, and not the first scan, which found 908 votes for Trump. This may indicate that the three ballots discussed in the previous section were not present during the hand count. (Per my reconstruction in Figure 7, two of the ballots were marked for Trump.) However, it is possible that this is a coincidence, and Trump lost two votes in Central Lake during the hand count for unrelated reasons.

5 Response to ASOG Report

I have reviewed the “Antrim Michigan Forensics Report—Revised Preliminary Summary, v2”, dated December 13, 2020, prepared by Russell James Ramsland, Jr. of Allied Security Operations Group (the “ASOG Report”, redacted version available at [1]). The report contains an extraordinary number of false, inaccurate, or unsubstantiated statements and conclusions, the most serious of which I refute below. Paragraph numbers that follow refer to the unredacted report.

5.1 Claims Regarding Adjudication

Mr. Ramsland’s central conclusion is that “the Dominion Voting System is intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results” (§B.2). His reasoning is that the system intentionally generates many errors while scanning ballots in order to cause the images of the ballots to be reviewed by an EMS operator, a process known as “adjudication” during which the votes can be manually edited (§B.12). This provides an opportunity, Mr. Ramsland believes, for a malicious operator to change votes without being detected. Citing his forensic examination, Mr. Ramsland claims that a “staggering number of votes [in Antrim] required adjudication” (§B.12), and that “all adjudication log entries for the 2020 election cycle are missing” and must “have been manually removed” (§B.15).

There are several problems with this theory. First, adjudication occurs after ballots are scanned and poll tapes are printed. In Antrim County, the final reported results match the poll tapes in essentially all cases. Therefore, the final results could not have been altered using adjudication.

Second, Mr. Ramsland mischaracterizes the adjudication process. Dominion’s adjudication system produces detailed logs, which are recorded in the EMS together with the ballot scan and the scanner’s original interpretation, as illustrated in Figure 9. Far from being an ideal way to cheat without possibility of detection, adjudication creates abundant digital evidence.

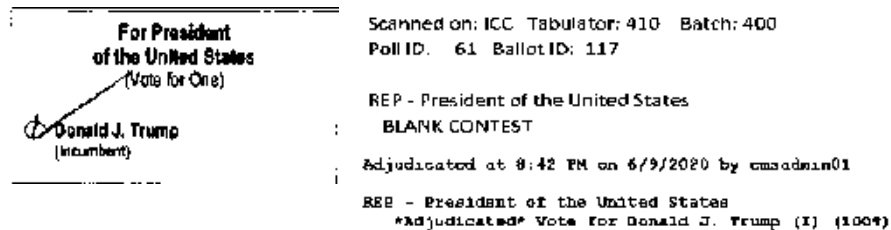


Figure 9: **An Adjudicated Vote.** These are excerpts from a ballot that was adjudicated after the 2020 presidential primary in Georgia. Dominion’s adjudication system stores the ballot image together with the scanner’s interpretation of the votes and a log of any changes made by the system operator. Adjudication is an optional feature of the Dominion system and was not used in Antrim County.

Third, and fatally, adjudication functionality was not enabled at all in Antrim County during the November 2020 election. The adjudication software application is an optional component of Democracy Suite. Antrim did not purchase it, and my examination of the EMS shows that it was not installed. There are no adjudication logs for the simple reason that adjudication was not used. Moreover, the tabulators were not configured to store ballot images—a necessary precondition for adjudication—and my inspection of the memory cards confirms that no ballot images are present. This means that it would have been impossible to use the adjudication feature even if the software were somehow installed after the election. Far from a “staggering number” of ballots being adjudicated, the actual number was zero. Therefore, Mr. Ramsland’s theories are completely inapplicable to the incident in Antrim County.

5.2 Claims Regarding Errors and Error Rates

Mr. Ramsland claims that Antrim’s scanners exhibited a high rate of errors during ballot processing as a means of enabling systemic fraud (§§B.2, B.12). Some errors *did* occur during scanning, as I explained in Section 4, but they affected only specific contests in a small number of precincts, and there is no reason to believe they were intentional. However, Mr. Ramsland is largely referring to others kinds of errors that he believes occurred on the basis of his mistaken interpretations of the forensic evidence.

For instance, the report repeatedly refers repeated to an error rate of 68.05% (§§B.6, B.8, J.1, J.3). Mr. Ramsland calculated this percentage from the scanner log for the November 6 rescan in Central Lake, which contains 15,676 lines, 10,667 of which Mr. Ramsland classified as errors. “These errors resulted in overall tabulation errors or ballots being sent to adjudication,” he says, concluding that “[t]his high error rate proves the Dominion Voting System is flawed and does not meet state or federal election laws” (§B.8).

In actuality, the 68% figure is meaningless. Scanning a single ballot produces a variable number of lines in the log file—ranging from two to dozens—often including many benign warnings or errors. Many other entries and warnings are generated during pre-election testing or while starting or shutting down the machine. This means that the fraction of lines that are errors does not represent a fraction of ballots or votes, the entities for which an error rate would be relevant.

Moreover, the errors in the log file do not mean what Mr. Ramsland purports them to. He claims that “[i]n Central Lake Township there were 1,222 ballots *reversed* out of 1,491 total ballots cast, resulting in an 81.96% rejection rate. All reversed ballots are sent to adjudication for a decision by election personnel” (§B.10, emphasis in the original). This is referring to log entries like those in Figure 10 that say “Ballot has been reversed”. However, these entries have nothing to do with adjudication. They simply mean that the ballot has been returned to the voter; i.e., the *paper feeding mechanism* has been reversed, as when a vending machine returns a dollar bill that has been misfed. This is a common and benign occurrence. In my experience, it often takes multiple tries to feed a ballot into a scanner, particularly when using a secrecy sleeve like those provided in Michigan.

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13415 Nov 06/2020 18:28:22 ScanVote Ballot 1107 processed successfully.
13416 Nov 06/2020 18:28:22 ScanVote Total number of ballots = 1202.
13417 Nov 06/2020 18:28:37 ScanVote Ballot 1107 processed successfully.
13418 Nov 06/2020 18:28:37 ScanVote Total number of ballots = 1203.
13419 Nov 06/2020 18:28:46 ScanVote Warning - top side start marker (top left corner), RectangleFind rcTop=0 rcBottom=5225
13420 Nov 06/2020 18:28:53 ScanVote Ballot 1107 processed successfully.
13421 Nov 06/2020 18:28:53 ScanVote Total number of ballots = 1204.
13422 Nov 06/2020 18:29:08 ScanVote Warning + error, correlateMarker input: xx(0,2200) yy(2386,1801)
13423 Nov 06/2020 18:29:08 ScanVote Warning + error, correlateMarker findPattern
13424 Nov 06/2020 18:29:08 ScanVote Warning + error, right markerM4, rectangle height, detected 39, expected 34
13425 Nov 06/2020 18:29:08 ScanVote Warning + failed correction, right edge markerM4, pattern match, percent=0.0 rc=51486
13426 Nov 06/2020 18:29:08 ScanVote Warning + error, right edge markerM4 on bottom side not found.
13427 Nov 06/2020 18:29:08 ScanVote Warning + error, front page grid problem
13428 Nov 06/2020 18:29:08 ScanVote Warning + Ballot format or id is unrecognizable.
13429 Nov 06/2020 18:29:07 ScanVote Ballot has been reversed.
13430 Nov 06/2020 18:29:21 ScanVote Ballot 1107 processed successfully.
13431 Nov 06/2020 18:29:21 ScanVote Total number of ballots = 1205.
13432 Nov 06/2020 18:29:37 ScanVote Ballot 1107 processed successfully.
13433 Nov 06/2020 18:29:37 ScanVote Total number of ballots = 1206.
13434 Nov 06/2020 18:29:44 ScanVote Warning + error, top side barcode horizontal issue, slope down: bar#3841 x1=3842 x2=
13435 Nov 06/2020 18:29:44 ScanVote Warning + Ballot format or id is unrecognizable.
13436 Nov 06/2020 18:29:46 ScanVote Ballot has been reversed.
13437 Nov 06/2020 18:30:01 ScanVote Ballot 1107 processed successfully.
13438 Nov 06/2020 18:30:01 ScanVote Total number of ballots = 1207.
13439 Nov 06/2020 18:30:14 ScanVote Ballot 1107 processed successfully.
13440 Nov 06/2020 18:30:14 ScanVote Total number of ballots = 1208.

```

Figure 10: **Central Lake Scanner Log Entries.** This log excerpt from the Central Lake memory card shows several ballots being processed. The warning messages relate to benign instances where ballots did not feed into the scanner correctly and were ejected (“reversed”) for the voter to try again. This is analogous to a vending machine returning a dollar bill that was inserted incorrectly.

By way of example, 11 of 26 lines in Figure 10 are classified by the scanner as warnings, which might result in an “error rate” of 42% by Mr. Ramsland’s methods. However, upon closer inspection, the log merely shows two instances where ballots were misfed and returned to the voter. Both times, ballots were successfully processed a few seconds later, so it is likely that the voters simply tried again.

5.3 Claims Regarding Log Entries

Mr. Ramsland makes several further mistakes in interpreting the election system logs. He states that the scanner log shows that “Divert Options” were selected and claims that this means “all write-in ballots were sent for ‘adjudication’ by a poll worker or election official to process the ballot based on voter ‘intent’”. Adjudication files allow a computer operator to decide to whom to award those votes (or to trash them)” (§J.4). In reality, the divert option simply means that when a voter has selected a write-in, the scanner directs the physical ballot into a separate compartment within the ballot box. This makes it more convenient for a worker to later read the name that was written in. All voter selections, including the presence of a write-in, are processed normally by the scanner and reflected on the poll tape. The setting has nothing to do with electronic adjudication.

Mr. Ramsland also points to scanner log entries that show “Override Options” were enabled for several classes of ballots. He mistakenly claims that these settings “allow[] any operator to change those votes” (§J.5). “This gives the system operators carte blanche to adjudicate ballots,” he further claims (§J.6). In actuality, the “Override Options” refer to situations where the scanner warns

a voter that they may have made a mistake when marking their ballot, such as an overvote or undervote. If the override option is enabled, voters are allowed to acknowledge the warnings and cause the scanner to accept their ballots despite the error conditions. These settings have nothing to do with “overriding” voters’ selections, and they do not mean the ballots will be sent to adjudication.

Mr. Ramsland further claims that the scanner log shows that “RCV or Ranked Choice Voting Algorithm was enabled” which “allows the user to apply a weighted numerical value to candidates and change the overall result” (§J.2). In reality, although some log entries reference the voting system’s RCV feature, they do not indicate that it was enabled. The EMS and memory card data show that RCV was not in use, as do the results of the hand recount of the presidential contest.

Mr. Ramsland claims that on “November 21, 2020, an unauthorized user unsuccessfully attempted to zero out election results” (§B.17). The only evidence he offers for this assertion is an EMS log file entry that reads “EmsLogger - There is no permission to {0}”, which he claims “is direct proof of an attempt to tamper with evidence” (§J.8). This is absurd and misleading. A programmer would immediately recognize that {0} is merely a placeholder, in this case one that was intended to be replaced with a description of the attempted action [26]. It has nothing to do with “zeroing” election results.

Citing another error message logged to the EMS, “XmlException: The ' ' character, hexadecimal value 0x20, cannot be included in a name”, Mr. Ramsland concludes, “Bottom line is that this is a calibration that rejects the vote” (§J.8). This is completely baseless. The error refers to a field name in a data structure (an XML entity), which the relevant programming standard does not allow to contain a space. It has no relation to the names of contests or candidates, and there is nothing that suggests the error resulted in a rejected vote.

5.4 Claims Regarding Software Updates

Mr. Ramsland repeatedly mischaracterizes the updates to the scanner election definitions as “software updates” (§§B.9, B.18, D.14–17, E.1). Although sometimes referred to as “ballot programming”, election definitions in the Dominion system are not software in the sense of a computer program but rather data files that specify the content and layout of the ballots. In normal operation, they do not change the scanner’s software, although they do affect its behavior. Mr. Ramsland is wrong when he describes Central Lake Township as scanning twice with “different software versions of the operating program to calculate, not tabulate votes” (§D.16). The scanner used the same software both times, but it was configured using different election definition files.

Elsewhere, Mr. Ramsland seems to confuse ballot definition changes with firmware updates, which *do* change the scanner’s software (§D.17). Ballot definitions are necessarily changed before every election, but firmware updates are a relatively rare occurrence that typically requires re-certification of the software under U.S. Election Assistance Commission guidelines. There is no evidence that any firmware updates occurred during the 2020 election cycle in Antrim County.

5.5 Claims Regarding Central Lake and Mancelona Townships

The report discusses the differences between the poll tapes from the two scans in Central Lake Township (§D.1–19). It points to three down-ballot contests where there were large changes to the results: the Central Lake and Ellsworth school board races and State Proposal 20-1. I explained in Section 4 precisely how these changes resulted from revisions to the ballot design in Central Lake Village. No other contests were affected by those revisions.

The report states that the Central Lake Township Clerk told the ASOG team that three ballots that were damaged were not included in the second scan (§D.3). Elections staff transcribed them onto new ballots, but they were not reflected in the final numbers (§D.5). As I explained in Section 4.6, the data indicate that three ballots were not included during the second scan. If those were the three damaged ballots, this supports the conclusion that the ballots were omitted due to human error by elections staff.

The report also discusses Mancelona Township and states that there is no indication that logic and accuracy testing was performed there following the update to the election definition (§E.2). This is incorrect. The scanner logs from the Mancelona Township memory cards clearly show that this testing was performed. Lines 1–855 of the log from Precinct 1 and lines 1–971 of the log from Precinct 2 indicate that testing was performed from approximately 2–3 p.m. on October 24, the day after the county received the updated election definition. During that time, each log shows 126 or 127 ballots being scanned, a poll tape being printed, and the card being reset for use by voters. I discussed when logic and accuracy testing was performed and its impact on the incident in Section 4.1.

Mr. Ramsland claims that “the Help America Vote Act, Safe Harbor provides a 90-day period prior to elections where no changes can be made to election systems” (§D.17), and he says that the use of the revised election definition in Mancelona Township violated this rule, calling it “an election de-certifying event” (§E.1). In fact, no such rule exists. Moreover, it would not have been possible for Antrim to finalize any of its election definitions 90 days before the November 3 election, since many candidates were not determined until after the results of the August 4 primary election were certified.

5.6 Claims Regarding Venezuela

Mr. Ramsland cites the work of Gustavo Delfino, who used statistical methods to investigate election fraud in Venezuela in the early 2000s. Although Mr. Ramsland writes that “[o]ur investigation into the error rates and results of the Antrim County voting tally reflect the same tactics” (§B.24), the relevance to Antrim is unclear. Venezuela uses completely different voting technology than Michigan, produced by a different company and based on touch-screen direct-recording electronic voting machines rather than hand-marked paper ballots. To my knowledge, neither Mr. Ramsland nor Mr. Delfino has performed any credible statistical analysis of the Antrim County results, let alone one that supports the conclusion that there was fraud.

5.7 Claims Regarding Security Problems

Some of the ASOG report’s claims about security problems in Antrim County election equipment are correct or based in fact, but Mr. Ramsland draws several incorrect conclusions.

Software Updates The report is correct that the EMS is missing important Windows security updates, potentially leaving it vulnerable to various methods of attack (§I.2). The system is running Windows 10 version 1607, which was released in 2016, and it appears not to have had any updates installed for at least two years. The antivirus definitions are similarly out of date.

This is a serious security problem. However, Mr. Ramsland is wrong that “[t]here is no way this election management system could have passed tests or have been legally certified” (§B.16). In fact, missing software updates are frequently an unfortunate consequence of the federal certification process, under which voting system vendors must obtain EAC approval for any changes to election system software, including Windows updates [32]. If there are any security updates that have been approved for the Dominion system, Antrim County should promptly install them. However, installing unapproved updates, even for critical vulnerabilities, would potentially violate the system’s certification.

Security Event Log The report is correct that the Windows security event log in the EMS image only contains entries extending back to November 4, 2020, the day after the election (§B.16). However, the timing appears to be a coincidence. The system is configured so that the maximum size for this log file is 192 MB, and when it grows beyond this size, the oldest entries are automatically removed. Nevertheless, security logs are important sources for forensic investigation and should be retained for as long as they are potentially relevant. Having a fixed maximum size is contrary to best practice.

Network Connectivity The report is correct that Dominion scanners have the ability to be connected to external networks (§B.20). Some Michigan jurisdictions use this functionality to transmit preliminary results to their EMSes using wireless modems. Connecting scanners or EMSes to the Internet or other external networks creates significant risks. According to the Michigan Election Security Advisory Commission, “[i]t is possible that unofficial results could be intercepted or manipulated, that the locality’s election management system server could be attacked remotely over the network, or that optical scanners could themselves be remotely attacked” [25]. For these reasons, the Commission recommended that jurisdictions discontinue wireless result transmission.

However, Antrim County did not purchase and does not use the Dominion wireless results transmission functionality. Instead, results are returned by physically transporting the memory cards. Based on the EMS event log, it does not appear that the EMS has ever been connected to a network.

Authentication and Access Control The report is correct that the authentication and access control mechanisms on the EMS have serious weaknesses. Antrim workers almost exclusively used a single Windows user account that had full administrative privileges over the computer (§I.10). This account has the nec-

essary privileges to alter log files and bypass other security controls. For instance, anyone logged into this account has full access to the SQL server databases that run the election, with no additional authentication required (§I.4). This database access can then be used to circumvent account passwords within the Democracy Suite applications (§I.5), as I did to conduct my tests in Section 3.

The report also states that the EMS hard disk was not encrypted (§I.3). I was unable to find evidence in the disk image to confirm or refute this. If it is true, an attacker with physical access to the computer can bypass the Windows account passwords, install malicious software, and read or change data arbitrarily. Whether or not Antrim County maintains strong physical security for the EMS, disk encryption should be enabled to provide an additional layer of defense.

These problems should be promptly mitigated. However, I am not aware of any credible evidence that any security problem was ever exploited against Antrim County's election system. As my analysis shows, the anomalies that occurred in the November 2020 results are fully explained by human error.

6 Conclusion

My investigation shows that the Antrim County incident was initiated by unusual circumstances that are unlikely to have widely affected other jurisdictions. After making last-minute revisions to certain ballot designs, workers made two key human errors that directly led to inaccurate results:

- County staff failed to ensure that all ballot scanners used the revised election definition. This caused the EMS to misinterpret results from the scanners, leading to major election-night reporting errors (that are now fully corrected).
- Township staff failed to ensure that all ballots used the revised ballot designs. Ballots that did not match the scanner configurations were misread, leading to smaller errors in specific down-ballot contests (that remain uncorrected).

Antrim could have discovered these problems before incorrect results were published or deemed official, but several opportunities to do so were missed:

- Townships failed to notice poll tape errors during pre-election testing.
- Poll workers erased memory cards, making the reporting errors harder to spot.
- County staff did not adequately investigate EMS errors on election night.
- County staff failed to “sanity-check” the initial results before posting them.

To their credit, the county and state quickly understood the technical cause of the major anomalies. However, during the process of correcting the original problems, further human errors occurred that led to additional inaccurate results:

- County staff neglected to remove bad data before publishing updated results on November 5, again causing widespread reporting errors (later corrected).
- County staff made data entry errors when manually inputting results, affecting more than 2% of reported votes across the county (now fully corrected).
- County canvassers failed to ensure that all results matched the poll tapes, allowing data entry errors to affect some of the certified results (now corrected).
- Three ballots may have been omitted when Central Lake re-scanned on November 6, due to a separate human error. This possibly changed the outcome of the Central Lake Village Marihuana Retailer Initiative (and remains uncorrected).

Some of these human errors would have been harmless individually, but their combined effects undermined safeguards that should have ensured accuracy. Their number speaks to the extreme pressures that election workers faced last year, in the midst of a global pandemic and a bitterly contested presidential contest.

There is no credible evidence that the Dominion system was deliberately designed to induce errors, but there were missed opportunities for the software to do more to election staff avoid making mistakes:

- When modifying the ballot designs, the software stated that old ballots and election definitions would be “unusable”. However, it failed to clearly warn that using them anyway could result in erroneous results.

- The EMS and scanners could have prevented or detected the use of incompatible ballots and election definitions. They did not and gave no indication when incompatible ballots or election definitions were used.

Several of the election procedures that broke down due to human error are important security protections. Furthermore, the EMS lacks important security updates, has weak authentication and access control mechanisms, and is vulnerable to compromise if an attacker has physical access to the computer. These are serious vulnerabilities that should be mitigated on a priority basis, but there is no evidence that any of these problems was ever exploited in Antrim County. My analysis has precisely accounted for all known anomalies in Antrim’s November 2020 election results, and none was the product of a security breach.

7 Recommendations

On the basis of my investigation, I offer the following recommendations to improve the administration of future elections:

1. Michigan and other states should expand the use of risk-limiting audits (RLAs) so that they occur in all major contests. RLAs provide a last line of defense against error and fraud and provide an added basis for voter confidence.
2. The Bureau of Elections should require counties to perform *end-to-end* pre-election testing, in which memory cards from L&A testing are loaded into the EMS and the results report is checked for accuracy. Such testing would have detected the mismatched election definitions in Antrim County.
3. The Bureau of Elections should revise L&A testing procedures to ensure that testing is repeated after any change to election definitions or ballot designs.
4. The Bureau of Elections should revise county canvassing procedures and training to ensure that reported results in all contests are accurately compared to the results on scanner poll tapes and any discrepancies fully explained.
5. States that do not require canvassers to compare results to poll tapes, as Michigan does, should introduce this form of validation, which provides an important safeguard against reporting errors.
6. The Bureau of Elections should revise procedures and training to clarify what steps must be taken if absentee voters return ballots that use outdated designs.
7. The Bureau of Elections should revise training materials to include discussion of lessons from the Antrim County incident, including the importance of reviewing results for obvious errors or omissions before making them public.
8. Antrim County should provide additional training for county and township staff concerning the correct operation of the Dominion voting system, including proper procedures for operating the EMS and polling place equipment.
9. Dominion should revise its documentation to more prominently warn that mismatched election definitions could lead to erroneous results.
10. Other voting system vendors should review their equipment to determine whether reporting errors could potentially occur under similar circumstances.
11. Dominion should enhance D-Suite to verify that the election definition on a memory card being loaded is compatible with the one used by the EMS.
12. Dominion should revise documentation and training to emphasize that routine EMS tasks should not be performed from privileged user accounts.
13. Dominion should ensure that customers receive and are instructed to apply all appropriate security updates affecting EMS software components.
14. Dominion should advise customers to enable disk encryption on EMS systems and to increase the retention period of the Windows security event log.
15. The Bureau of Elections should audit the physical security of county EMSes.
16. The Bureau of Elections should require election technology, including EMSes, to promptly receive all appropriate security updates.

17. Counties that transmit scanner results over the Internet or using wireless modems should discontinue these practices, as recommended by the Michigan Election Security Advisory Commission [25].
18. Jurisdictions should consider enabling the capability of their scanners to save ballot images. These could help resolve questions about the accuracy of results in future incidents, especially if the integrity of the paper trail is questioned.
19. Jurisdictions should retain electronic election records, such as memory cards and EMS data, for as long as physical records. These provide important evidence for investigating (or disproving) problems later discovered or alleged.
20. When future election incidents occur, even if they receive less public attention than the events in Antrim County, states should consider performing investigations like this one, to ensure that the problems are well understood and that any lessons are disseminated to help other jurisdictions avoid similar issues.

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A Qualifications

My name is J. Alex Halderman. I am Professor of Computer Science and Engineering, Director of the Center for Computer Security and Society, and Director of the Software Systems Laboratory at the University of Michigan in Ann Arbor. I hold a Ph.D. (2009), a master's degree (2005), and a bachelor's degree (2003), *summa cum laude*, in computer science, all from Princeton University. My background, qualifications, and professional affiliations are set forth in my *curriculum vitae*, which is available online at <https://alexhalderman.com/home/halderman-cv.pdf>.

My research focuses on computer security and privacy, with an emphasis on problems that broadly impact society and public policy. Among my areas of research are software security, network security, computer forensics, and election cybersecurity. I have authored more than 90 articles and books, and my work has been cited in more than 11,000 scholarly publications. I have served as a peer-reviewer for more than 35 research conferences and workshops.

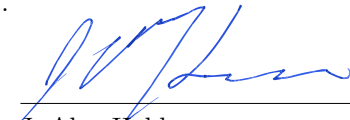
I have published numerous peer-reviewed research papers analyzing security problems in electronic voting systems used in U.S. states and in other countries. I have also investigated methods for improving election security, such as efficient techniques for auditing whether computerized election results match paper ballots. I regularly teach courses in computer security, network security, and election cybersecurity at the graduate and undergraduate levels. I am the creator of Securing Digital Democracy, a massive, open, online course about computer security and elections that has attracted more than 20,000 students.

I serve as co-chair of the State of Michigan's Election Security Advisory Commission, by appointment of the Michigan Secretary of State. I have also performed security testing of electronic voting systems for the Secretary of State of California. I have testified before the U.S. Senate Select Committee on Intelligence and before the U.S. House Appropriations Subcommittee on Financial Service and General Government on the subject of cybersecurity and U.S. elections.

I received the John Gideon Award for Election Integrity from the Election Verification Network, the Andrew Carnegie Fellowship, the Alfred P. Sloan Foundation Research Fellowship, the IRTF Applied Networking Research Prize, the Eric Aupperle Innovation Award, the University of Michigan College of Engineering 1938 E Award for teaching and scholarship, and the University of Michigan President's Award for National and State Leadership.

Affirmation

I declare under penalty of the perjury laws of the State of Michigan and the United States that the foregoing is true and correct, and that this report was executed this 26th day of March, 2021.



J. Alex Halderman



REPORT ON

THE NOVEMBER 2020 ELECTION IN MICHIGAN

COMMITTEE MEMBERS

Senator Edward McBroom – Chair

Senator Lana Theis – Majority Vice Chair

Senator Jeff Irwin – Minority Vice Chair

Senator John Bizon

**Exhibit
PX 0107**
Oltmann

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EXECUTIVE SUMMARY ON **THE NOVEMBER 2020 ELECTION IN MICHIGAN**

Without question, the increased political polarization of our nation has resulted in increasing public discontentment with the administration, and therefore results, of our elections. This discontent, which has been demonstrated on both sides of the aisle (see: Bush v. Gore 2000 and allegations of Russian interference in the 2016 election) culminated in public outcry of widespread fraud in 2020.

Indeed, a recent Gallup Survey found as much as 59% of voters no longer trust our elections. Voting and the right to vote is absolutely foundational to our democracy. Without faith in our elections process, fewer members of the public will likely choose to exercise that right. Lowered confidence in our election system, and thereby lower turnout, is a threat to our democracy we should not take lightly.

Many election administrators and officials have pointed to the fact that unprecedented turnout in 2020 stress-tested our elections system. Still, around 40% of the eligible population did not cast a vote. For a robust democracy, we must invest in and build a system that can withstand ever greater turnout in future elections.

In order to do this, this Committee undertook the foundational work of investigating the 2020 election — from both the perspective of election administrators, officials and workers and the perspective of the observing public. The Committee embarked upon hours of public testimony, the review of countless documents and presentations on the 2020 election, and careful review of the elections process itself.

This Committee found no evidence of widespread or systematic fraud in Michigan's prosecution of the 2020 election. However, we cannot and should not overlook severe weaknesses in our elections system. Whether it is lack of clarity in the tabulation of ballots, unnecessary barriers to ensuring that every lawfully cast ballot is counted, inconsistent poll worker or challenger training, or simply a system not primarily designed to handle ballots cast absentee or otherwise prior to Election Day, it is the opinion of this Committee that the Legislature has a duty to make statutory improvements to our elections system.

This Committee exhausted every resource available to it to thoroughly and faithfully examine our elections process in Michigan and drill down on claims and testimony specific to the 2020 election. However, this investigation should not be considered exhaustive. Remaining conscientious of the limitations of this Committee, every possible investigative avenue was not undertaken. Nevertheless, this Committee stands steadfastly behind the recommendation that our current elections system requires change in order to meet the future challenges presented by modern voting preferences, behaviors, and threats. There are clear weaknesses in our elections system that require legislative remedy.



REPORT ON THE NOVEMBER 2020 ELECTION IN MICHIGAN

LETTER FROM THE CHAIR **SENATOR EDWARD McBROOM**

When I agreed to begin investigating the election, rumors and uncertainty were rampant. Allegations of markers bleeding through ballots, voter intimidation, dead voters, mystery ballot dumps, foreign interference, and ballot harvesting were just a few of the issues during the first days following the November 2020 election. Emotions and confusion were running wild across the country. Fears and hopes were had by every person, including myself.

On one hand was the hope some had to overturn the election. That hope was necessarily coupled with a dreadful reality that our elections were unsound. On the other hand was hope the election was accurate, coupled necessarily with those who feared the direction the victor would take the country.

I made it clear at the start that the investigation effort would be taken with a firm commitment to truth and a goal to reassure the citizens of this state that their votes counted. Within a few weeks, the State Board of Canvassers also unanimously requested the Legislature conduct a serious investigation into the election.

I believe the people deserve to know all the truth and to see their representatives seeking answers. People were understandably confused by new laws, practices, orders and determinations from the governor and secretary of state and it is right and proper for them to demand answers. This right and obligation was unfairly and unfortunately discounted by many on my own side of the aisle after the 2016 election when the other party lost and felt sure some illicit or improper actions must have taken place. When they did regain power, they were quick to utilize all of it to spend two years chasing every conspiracy and specious allegation. I pray my own party will not repeat this mistake for the next four years.

Digging into the mechanics of the election was labor intensive, but very revealing. We found both real vulnerabilities and resiliency to the systems. We also discovered the extent to which our elections officials go to facilitate our elections. The report goes into considerable detail on many of these issues and I hope readers will be reassured by the security and protections in place, motivated to support reforms that are needed, and grateful to our fellow citizens that do the hard work.

The greater challenge to this effort has been seeking the truth amid so much distrust and deception. Our present times are full of reasons for citizens to distrust their government, politicians, and leaders. The last year has seen so much amplification of this distrust. Perhaps it has never been more rampant and, certainly, modern communication helps to fan the flames of lies and distrust into an unquenchable conflagration.

“All politicians lie” is the popular axiom. Unfortunately, lies and deceit are not exclusive to politicians. Throughout our investigation, members have been actively following and engaged with various persons and reports. We have collectively spent innumerable hours watching and listening and reading. Some of these people and reports are true. Unfortunately, many of them are not, either because of a misunderstanding or an outright deception. As is often the case, the truth is not as attractive or as immediately desirable as the lies and the lies contain elements of truth.

Regardless of my status as a chairman, senator, politician, Christian, or human, I do not expect or desire my words in this report to be simply accepted. Instead, I ask all to simply put into

(Continued)

REPORT ON THE NOVEMBER 2020 ELECTION IN MICHIGAN

LETTER FROM THE CHAIR **SENATOR EDWARD McBROOM**

their determinations the same particular guidance all persons ought to consider when weighing evidence. We must all remember: “extraordinary claims require extraordinary proof” and “claiming to find something extraordinary requires first eliminating the ordinary.” Also, sources must lose credibility when it is shown they promote falsehoods, even more when they never take accountability for those falsehoods.

At this point, I feel confident to assert the results of the Michigan election are accurately represented by the certified and audited results. While the Committee was unable to exhaust every possibility, we were able to delve thoroughly into enough to reasonably reach this conclusion. The strongest conclusion comes in regard to Antrim County. All compelling theories that sprang forth from the rumors surrounding Antrim County are diminished so significantly as for it to be a complete waste of time to consider them further.

Most of the rigorous debate over additional audits comes from fears surrounding the technology used and its vulnerabilities as allegedly demonstrated in Antrim County. Without any evidence to validate those fears, another audit, a so-called forensic audit, is not justifiable. Michigan’s already completed post-election audit and risk-limiting audit are also far more substantive than Arizona’s standard audit. However, I am keeping a close eye on the legislatively-initiated forensic audit in Arizona and will continue to ask questions regarding other election issues I feel are not settled. If genuine issues are shown in Arizona’s audit or from continued investigation here, I will not hesitate to ask the Committee to consider recommending an audit or amending this report.

I must acknowledge and thank my staff including Jeff Wiggins and Paul Burns that spent so much of their work and personal time on this report. I also want to thank my current Committee members, along with all of those that participated and served during these hearings last term, including Sens. Lucido, MacDonald, and Santana, as well as Representative Hall and the members of the House Oversight Committee. Staff from those offices, the Senate, and the Committee’s clerk all went above and beyond to facilitate these hearings in very difficult situations and deserve sincere thanks. Finally, as the report says in its conclusion, I want to thank the citizens of this state. Whether or not one agrees with the report or even the conducting of the investigation, those opinions were shared with myself and the Committee. An active and passionate public is critical to maintaining our republic and your participation is reassuring that attribute is alive and well.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed McBroom", with a stylized, flowing script.

Sen. Ed McBroom, Chair

REPORT ON THE NOVEMBER 2020 ELECTION IN MICHIGAN

I. INTRODUCTION

Beginning on Nov. 7, 2020, the Senate Oversight Committee (the “Committee”) commenced an inquiry into claims of election fraud and impropriety. Chair McBroom made clear that the purpose of this inquiry was not to change the outcome of the election for President of the United States. Rather, the goal of the Committee was to provide elected officials and Michigan residents a better understanding of where the administration of elections can be reformed and strengthened, ensuring that Michigan citizens can have confidence in our election processes. This report contains findings and suggestions developed from 28 hours of testimony from almost 90 individuals spanning nine committee hearings, the review of thousands of pages of subpoenaed documents from multiple government entities, hundreds of hours of Senate staff investigation, and countless reviews of claims and concerns from Michigan residents. A detailed examination of all evidence presented to the Committee established an undeniable conclusion; while there are glaring issues that must be addressed in current Michigan election law, election security, and certain procedures, there is no evidence presented at this time to prove either significant acts of fraud or that an organized, wide-scale effort to commit fraudulent activity was perpetrated in order to subvert the will of Michigan voters.

II. ACTIONS AND OBJECTIVES

The Committee’s primary objective was to produce an informative and actionable report by undertaking the following actions: 1) Investigate claims of impropriety, fraud, error, and mismanagement of certain election processes; 2) Determine whether any of the claims brought forward were substantiated by evidence; and 3) Identify areas of Michigan election law where reform or an updating of the statute may be required in order to ensure transparency and confidence in the election process. The Committee made it clear that first-person accounts reporting alleged improprieties were given higher value as evidence to address these claims, in addition to professional and expert testimony regarding the technical operation of state and local election procedures and vote tabulation.

III. ISSUES AND ALLEGATIONS

- 1. Deceased and Non-Residents Voting**
- 2. Unsolicited Absentee Voter Ballot and Application Mass Mailings**
- 3. 3rd Party/Private Funds Used for Public Election Activities and Equipment**
- 4. Rights and Duties of Poll Challengers/Watchers Improperly and Unlawfully Restricted**
- 5. Antrim County Results**
- 6. Operating Issues with Tabulators and Precinct Computers**
- 7. Signature Verification Process**
- 8. Jurisdictions Reporting More Than 100% Voter Turnout**
- 9. Absentee Ballots Tabulated Multiple Times**
- 10. Thousands of Ballots “Dumped” at the TCF Center on Election Night/The Next Morning**
- 11. Vote Totals Abnormal Compared to Past Presidential Election and Other Vote Count Irregularities**
- 12. Additional Issues**
- 13. Audits**

IV. INVESTIGATION AND FINDINGS

OVERVIEW OF INVESTIGATION

The Committee received many complaints of election fraud throughout the state in the days following the 2020 election. The Committee reviewed these claims through several avenues, including but not limited to the manners outlined below:

- Engaged with local and county election officials to discuss the procedures utilized to administer the election, in addition to confirming certain vote totals where alleged misreporting occurred.
- Researched the claims of deceased individuals having a vote cast in their name by reviewing obituaries, various online databases, social media posts, as well as speaking with individuals who made the claims or were the subject of those claims.
- Called individuals who were said to have received unsolicited absentee ballots through the mail.
- Subpoenaed and reviewed documentation of communications from the secretary of state's office regarding pre-election mailings.
- Subpoenaed and reviewed documents and communications from the Livonia and Detroit city clerks related to election activities and vote tabulation.
- Received testimony from Kent County Clerk Lisa Lyons, Ingham County Clerk Barb Byrum, Lansing City Clerk Chris Swope, and Grand Rapids City Clerk Joel Hondorp, regarding the election processes in their respective municipalities and any reforms they would recommend.
- Received testimony from Antrim County Clerk Sheryl Guy, detailing the events that led to the reporting of incorrect, unofficial vote tallies which cascaded into accusations of vote switching and machine tampering in Antrim County.
- Received many hours of first-hand testimony regarding the events that transpired at the TCF Center on and around Election Day. This testimony was in addition to the more than 200 sworn affidavits submitted by first-hand and second-hand witnesses that were reviewed by the Committee.
- Received testimony from Chris Thomas, the Senior Elections Advisor for the city of Detroit at the time of the November 2020 election and former Michigan state director of elections, who was stationed at the TCF Center.
- Received testimony from Dominion Voting Systems CEO, John Poulus, on the company's role in providing voting equipment to several Michigan municipalities and whether they played a role in the reporting of incorrect results in Antrim County. Testimony was also received from officials representing Dominion competitors, Election Systems & Software (ES&S) and Hart InterCivic regarding those same issues.
- The chair and individual committee members researched additional claims of election fraud or impropriety made by individuals in Michigan and from across the country.

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- Received testimony from Republican and Democratic party officials regarding election training for volunteers and workers, and how that training, or lack of, impacted the events at the TCF Center and other polling places.
- Received testimony from Monica Palmer, Chair of the Wayne County Board of Canvassers, on what she experienced during the canvassing process in the 2020 election and how it could be improved.
- Met with other canvassers from around the state to understand their process and receive their observations.
- The chair and individual committee members met with various clerks around the state to discuss problems, allegations, and solutions.
- The chair and committee members spent countless hours watching and reading documentaries, news stories, and presentations regarding election issues.
- The chair and committee members examined the testimony provided by witnesses in front of the House Oversight Committee.
- The chair followed many allegations to specific sources and involved parties to ascertain the veracity or feasibility of such allegations.

REPORT ON THE NOVEMBER 2020 ELECTION IN MICHIGAN

FINDINGS

1. Deceased and Non-Residents Voting

The Committee researched these claims and concluded that most were false. There were two claims of deceased individuals casting votes that were found to be true; one was a clerical error while the other was a timing issue. The Committee concluded that none of these constituted fraudulent election activities or manipulations. The Committee also received claims of citizens who no longer live in the state of Michigan but had allegedly voted in the state's elections. These claims proved to be false upon researching each incident brought to the Committee's attention. An example of some of the claims are detailed below (the names of the individuals have been omitted to respect their privacy).

A widow from the Grand Blanc/Burton area claimed her husband, who passed away in 2013, had voted in the 2020 election. Senate staff searched the state database with the information provided by the individual and were not able to find her husband in the database. This would indicate that he had been removed from the voter database and his identity could not have been used to vote in the 2020 election.

A husband and wife, formerly of Jackson County and now living in Louisiana, claimed they saw documentation online that they had voted in Michigan during the 2020 general election. After researching the claim, it was discovered that they were mailed an absentee ballot application and are still registered to vote in Michigan. However, the state website shows that the local clerk did not receive returned and completed absentee ballot applications in these voters' names.

The Committee was also provided a list of over 200 individuals in Wayne County who were believed to be deceased yet had cast a ballot. A thorough review of individuals on that list showed only two instances where an individual appeared to have voted but was deceased. The first individual was a 118-year-old man whose son has the same name and lives at the same residence. The Committee found there was no fraud in this instance but was instead a clerical error made due to the identical name. The second individual was a 92-year-old woman who died four days before the November 2020 election. Research showed she had submitted her completed absentee ballot prior to the November 2020 election and prior to her death. Notably, research showed the secretary of state and clerks were able to discover and remove approximately 3,500 absentee ballots submitted by voters while they were alive but died before Election Day, which is a commendable accomplishment.

The Committee recommends county clerks be given the ability to assist in removing deceased voters from the Qualified Voter File (QVF). The Committee also recommends the secretary of state research and pursue methods, including statutory changes, that would prevent and identify those voting in multiple states.

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2. Unsolicited Absentee Voter Ballot and Application Mass Mailings

Citizens across the state were left confused and frustrated by the arrival of applications for long deceased family members, those who have moved to other states, or persons never present at that address. It appears the lists chosen by the secretary of state's Bureau of Elections were often older and previously purged. Local clerks were also frustrated as the applications duplicated some of their work and caused citizens to call on them for answers. Finally, the original mailing appeared to be not set up to return to the secretary of state to at least inform them of undeliverable applications.

The Committee subpoenaed the secretary of state for communications related to pre-election mailings. While a court ruled that the Secretary of State was permitted to send these mass mailings, there were significant communications between the department and Rock the Vote, a group which tends to target young persons and those with more left of center political leanings.

During the review of these communications, the Committee was simultaneously researching claims made in testimony and in court filings related to the absentee ballot process. Many court filings and individuals highlighted a data spreadsheet by an individual who claimed to have worked with "experts" to determine whether individuals had received an unsolicited absentee ballot. The spreadsheet indicated that "289,866 illegal votes" had been cast. This figure came from the Voter Integrity Project. To arrive at this number, the group used a methodology where they called 1,500 voters and asked if they had received a ballot without requesting it, something that would be illegal although not specifically indicative of fraudulent voting. The number of affirmative answers were then extrapolated out to 289,866 voters statewide receiving these ballots which are defined as "illegal ballots." The repeated use of the terminology "illegal ballots" is misleading and causes significant confusion as it implies fraudulent votes or votes received that do not come from legitimate sources or should not be counted. However, while it may not be lawful to send ballots without first receiving an application, voting this ballot is not an illegal action by a lawful voter and it is not indicative of fraudulent or illicit behavior of the voter nor of an illegitimate vote.

The Committee called forty individuals from this list at random. Only two individuals reported having received an absentee ballot without making a proper request. One of the two individuals is labeled as a permanent, absentee voter within the state's QVF file, indicating that they had, at some point, requested to be placed on that list. The other individual voted via an absentee ballot in the August primary election, and it is possible they checked the box to vote absentee in the subsequent election and simply forgot they had chosen this option. Throughout discussions with these individuals, as well as others who claimed they had received an unsolicited ballot, it became clear that many equated receiving an absentee ballot application with receiving an absentee ballot. These are separate steps in the absentee voting process, with receiving an absentee ballot requiring that an application be completed and submitted by the voter. **There was no evidence presented to the Committee indicating that hundreds of thousands of absentee voter ballots were mailed to Michigan voters without previously being requested.**

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Further inquiry conducted by the chair and committee members with county and local clerks confirmed how difficult it would be for a citizen to attempt to fraudulently utilize the ballot of another, if the stolen application addressee voted at their actual, present location in Michigan. While the act of obtaining and submitting the ballot of another individual is not impossible, committing voter fraud in this manner undetected is unlikely, as the Qualified Voter File would immediately have a notation of the vote for the voter and the second attempt to request a ballot or to vote would not be allowed without investigation and explanation. Whether the real voter or the fraudulent

The Committee concludes this demonstrates a clear vulnerability for fraud that may be undetected, if the actual voter does not vote at all. If the actual voter does vote, it will create turmoil and draw attention from state and local officials. However, the lack of any such incidents or turmoil in the November 2020 election creates a clear probability that no such efforts were committed to any significant extent. The chance of encountering the attempted double vote scenario is so statistically unlikely as to make impossible even a small effort to do so.

Additionally, the mailing of unsolicited applications allows for two other related vulnerabilities. Applications sent to the former Michigan addresses of those moved out of state and applications sent to the new addresses of former Michigan citizens now registered to vote in another state constitute a real and virtually undetectable potential for fraudulent activity. The Chair's research into this topic, as well as a review of testimony provided by the secretary of state's director of elections to the Senate Elections Committee in October 2020, make it clear that there is essentially no mechanism in place to prevent counting votes from those who may be also registered and vote in another state, whether done by themselves or the recipient of an application at their former Michigan address. As there are no efficient or established procedures to confirm or detect this, it is not possible for the Committee to report on any occurrences or to have confidence no such actions occurred. However, with mass mailings of absentee ballot applications being mailed across state lines to many who no longer reside or vote in Michigan and to thousands of former addresses in Michigan, the situation must be addressed to ensure that those individuals are voting only once in an election, are doing so only in the state of their residence, and that no one is impersonating them at their old address.

The serious, potential outcomes of these vulnerabilities versus the minor effort to request an application make a strong and compelling necessity to not provide such applications without a request from a voter - as was standard practice until this past year. **Therefore, the Committee recommends the Michigan secretary of state discontinue the practice of mailing out unsolicited applications. The Committee also recommends only the current QVF being utilized by the state or locals when making mailings to registered voters of any nature.**

There were several reports of nursing home bound parents or other family members with dementia having a record of voting. **While the Committee was unable to reach any conclusions regarding the extent of such claims, additional training and clear instructions to caretakers or facility staff ought to be provided in such circumstances to clarify how and when such voting assistance is appropriate. The Committee also recommends pre-filled out applications from any source be disallowed as well.**

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3. 3rd Party/Private Funds Used for Public Election Activities and Equipment

A summary of the work and findings on this issue is not finalized at this time and may be amended to this report at a later date.

4. Rights and Duties of Poll Challengers/Watchers Improperly or Unlawfully Restricted

The Committee received claims that challengers from the Republican party were discriminated against and removed from polling locations without cause. There were also claims that challengers were not allowed to return to counting rooms and were supposed to sign in and out of the room but had not received that instruction. They were frequently required to stand six feet or more away from tables and workers in the normal exercise of their duties, despite a court settlement that ensured their right to monitor election procedures, within six feet when necessary. The Committee also received testimony that contradicted some of these statements and provided a different viewpoint. Volunteers and workers from both the Republican and Democratic parties made claims of hazing, rudeness, bigotry, racism, and other offensive behavior occurring while election activities were still underway. Several of the issues, such as the management of the official record of challengers allowed in or out, may have been simply driven by the situation with COVID-19 and will not be relevant again. Reports were heard of calls to citizens, ostensibly made by Republicans, informing them to come and vote on Wednesday rather than Tuesday. While many accusations will remain just that, one thing is perfectly clear: the rights and duties of poll watchers and challengers must be better understood and reinforced in their respective training and must be protected equally by election officials. This is an area in need of much reform and greater clarification in election law.

Additionally, there is significant evidence that the recruitment of Republican poll workers for Wayne County encountered significant obstacles. Many witnesses testified to volunteering but not hearing back from the county or being told there were already enough workers. Others testified to a particular moment at the TCF Center when workers were surveyed for party affiliation and only a few there raised their hands as Republicans. The Committee understands the logistics of recruiting Republicans for Wayne County and the city of Detroit can be difficult but finds the repeated reports of volunteers not being accepted or not having their emails returned troubling. Obtaining the proper ratios of partisan workers is of critical importance, especially ones from the local area.

The Committee encourages the Wayne County Republican Party and officials in the county and city clerks' offices to work together to obtain the correct number of workers for each election. Further, the Committee asks the Bureau of Elections to investigate and provide to the Committee an evaluation of partisan poll worker recruitment in Wayne County and the city of Detroit.

These issues were clearly reflected in the activities that occurred at the absentee counting board at the TCF Center. At one point, an audio recording was released of an apparent election training session in the city of Detroit where workers were instructed to maintain six feet between challengers and poll workers, due to COVID-19 precautions. Prior to the election, a court settlement ensured poll challengers could monitor election activities within six feet when necessary. After the settlement, clerk staff, like other election staff across the state, were to be informed of the ruling and how it would affect their activities on Election Day. Testimony was received by the Committee indicating that the settlement, which was reached after many workers completed their training, was not well known among the workers at the TCF Center. It is easy to see how

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this led to significant confusion and conflict, particularly as many workers had genuine fear and concern over their proximity to persons during the pandemic.

Contributing to the confusion and hostility of poll watchers and challengers was the differing opinions regarding the actual rights and duties of those individuals. These conflicts were only amplified by the partisan and ideological nature of the volunteers, despite some not affiliating with a political party. Multiple days of testimony from Republicans and Democrats made it clear that Republican challengers were committed to ensuring that challenges were issued and recorded when information was presented to indicate a voter was not, or may not be, eligible. Representatives of Michigan Democrats, however, indicated in testimony before the Committee that their specific training regarding the duties and obligations of challengers is to not ever challenge any ballots. While it was clear they recognized the legal reasons for challenging, they also called the law “archaic” and affirmed they train their challengers to not issue any challenges. They believe their obligation is to assure no vote is disqualified. One Democrat official even noted their reason for being there was to keep an eye on Republicans, not to challenge ballots. This significant difference of opinion and action contributed to some of the misunderstandings and tensions that occurred at the TCF Center, as each partisan observed the other failing to comprehend their duties or felt their duty was specifically to confront the other side.

The concern of partisan volunteers cloaked as Independent challengers through non-profit or third-party entities only added to the accusations of an unfair or unbalanced election environment. The Committee heard testimony and saw evidence that independent observers and challengers were frequently operating for one of the two major parties making their labels as Independents confusing and unhelpful.

It is apparent that the environment at the TCF Center became intolerable and the reactions to it must be understood in this light. While mistakes were clearly made by officials on all sides, it must be acknowledged that many of them were attempting to simply do their job during a time of increasing confusion and distrust. It is impossible for the Committee, or any legal entity, to sort through all the events or persons at fault. However, it appears obvious and reasonable to conclude that confusion, fear, misunderstanding, and even chaos occurred at the TCF Center to varying degrees on Nov. 3 and 4. The environment and those emotions were compounded by a lack of proper recruitment and/or training of election workers on the part of the clerk, as well as a failure of the Republican party to verify recruitment and training, supply an adequate number of election attorneys, and to properly train and counsel some of their volunteers and challengers.

Republican officials, along with some ostensibly Independent challengers, furthered the crisis by putting out the call to other members and citizens to descend on the location to stop what was described and presented as a stealing of the election. The descent into disorder with so many extremely concerned citizens elicited responses from poll workers that seemed necessary to them at the time, such as covering windows, calling police, denying lawful challenges, and removing challengers. Those actions by both sides were not always lawful or wise, and increased the angst and fears of the untrained challengers and observers, as well as the many in the public who did not understand what was shown to them by the media. **Despite these mistakes and, potentially, illegal**

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actions, the Committee found no evidence fraudulent activities were undertaken or that such actions led to irreparable harm to ballots or vote counting. Numerous safeguards, particularly the partisan make up of the election boards themselves, were not lost, despite these actions.

Therefore, the Committee recommends updating the requirements for challengers including the tasks and duties they are to preform, standards of conduct, and party affiliation. Additionally, clerks and parties need to be held to recruiting adequate workers, providing appropriate and uniform training including any recent law updates, and being able to instruct law enforcement in lawful responses to workers or volunteers creating a disturbance in the process of carrying out their duties. Officials need a clear chain of command in place for making decisions and being accountable, particularly if a crisis arises and if one of the leaders has left the premises. Finally, the Wayne County Republican Party and other, independent organizations, ought to issue a repudiation of the actions of certain individuals that created a panic and had untrained and unnumbered persons descend on the TCF Center. Both clerks and the parties need to take seriously their responsibilities of having properly trained and adequate personnel in place and the training ought to be uniform, regardless of party.¹

5. Antrim County

Antrim County became the focal point of multiple theories and concerns surrounding the Nov. 3 election, as the unofficial results reported at the end of the tabulation for the county were later discovered to be in error. The common claim surrounding this mistake was that the votes for Donald Trump were switched with votes for Joe Biden, providing Biden with a win in heavily-Republican Antrim County. However, this claim is inaccurate and was explained before a joint hearing of the Senate and House Oversight Committees in November 2020 by the Antrim County Clerk, Sheryl Guy.

Due to a series of errors made within the county clerk's office, the unofficial votes received from polling places on election night did not transfer into their respective spreadsheet columns correctly. This shifted the vote totals over a column for several races across the ballot. These mistakes began months earlier when several late items were ordered onto the ballot in certain townships. Unfortunately, new logic and accuracy tests were not performed, as required by law. Programming at the clerk's computer was not updated to reflect these changes; however, tabulators in the precincts were updated and had no problems processing ballots on Election Day. Tally sheets printed at the close of polls never reflected the errors reported in the clerk's unofficial results. On the morning of Nov. 4, once it became clear that the unofficial results were inaccurate and did not match the official votes printed by the tabulators, efforts began to discover the cause of the errors. The clerk and her staff made several attempts to re-tabulate and resolve the problem before understanding the cause. This resulted in additional, incorrect vote counts being reported. Once the cause was isolated, ballots were re-tabulated and the correct results, which matched the original tabulator sheets from Nov. 3, were posted. Multiple checks were easily able to rectify the situation and later, **a complete hand recount validated the original, official results as accurate.**

¹ The Department of Attorney General informed the committee on June 15, 2021 that it has been investigating issues related to the events at the TCF Center, per an official request of former Senator and Oversight committee member, Peter Lucido. It indicated a report on findings is forthcoming.

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A prime example of a misrepresentation of facts that then mislead citizens is found on a chart on page two of Allied Security Operations Group's (ASOG) Antrim County Forensic Report. The chart, shown below, and the accompanying information, led citizens to conclude the election results were suspiciously changing for over a month after the election. It also could lead one to believe election officials and the Dominion tabulators were dishonest in their work by not representing the source of the specific numbers shown, even though the information is readily available to the authors of the report. Further, the authors also chose to present only some of the information, leaving out specific data that would evidence something besides a massive conspiracy or computer hack created the problem.

Date	Registered Voters	Total Votes Cast	Biden	Trump	Third Party	Write-In	TOTAL VOTES for President
Nov 3	22,082	16,047	7,769	4,509	145	14	12,423
Nov 5	22,082	18,059	7,289	9,783	255	20	17,327
Nov 21	22,082	16,044	5,960	9,748	241	23	15,949
Dec 17	22,082		5,959	9,759	244	20	15,962

This second chart fills in relevant and critical information about the data and provides additional data points to provide greater context to the observer. This data was available to ASOG and others utilizing the previous chart, yet they chose not to provide the context nor the additional data.

	Date	Registered Voters	Total Votes Cast	Biden	Trump	Third Party	Write-In	TOTAL VOTES for President	Note
1.	Nov. 4	22,082	16,044	5,960	9,748	239	23	15,970	Tabulator tapes-official results (Not reported on election night).
2.	Nov. 4	22,082	16,047	7,769	4,509	145	14	12,437	Clerk's computer-unofficial results (publicly reported).
3.	Nov. 5	22,082	18,059	7,289	9,783	255	20	17,347	First attempt to rectify discrepancy.
4.	Nov. 6	22,082	16,044	5,960	9,748	241	20	15,969	Completion of re-tabulation.
5.	Nov. 16	22,082	16,044	5,960	9,748	241	20	15,969	Official Vote report.
6.	Nov. 21	22,082	16,044	5,960	9,748	241	20	15,969	Canvass/certification
7.	Dec. 17	22,082	16,044	5,959	9,759	244	20	15,982	Hand Recount

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Row one shows the vote totals shown on the tabulator tapes at the close of the election. These numbers are critical as they demonstrate, when coupled with the hand recount, that no tampering or pre-installed, illicit programing ever took place on the tabulators. It also shows that no fraudulent ballots were added to the ballot boxes to cover up such hardware/software malfunctions. The minor changes from the first tabulation to the final canvas and hand recount are well documented by election staff and result from several spoiled ballots that were not able to be processed in subsequent runs and from ballots that could not be electronically processed but could be hand counted.

Row two contains the vote count reported by the Antrim County clerk's office on election night, which was the unofficial vote count. As is detailed in this report, these results were incorrect because the programing to receive the data had not been properly updated after changes were made to the official ballots in certain townships. The result was what amounts to a spreadsheet having its fields improperly aligned with the incoming data. This would have been caught by logic and accuracy tests. The discrepancies with the tabulator tapes should have been discovered before these results were reported.

Row three shows the struggle faced by the clerk's office to determine what went wrong and how to correct it. These results show a series of urgent but mistaken attempts to address the errors that led to double counting of some precincts and absentee ballots. The contemporary poll books and worksheets are clear proof of what was happening, showing handwritten notes and commentary. The records also show who was there trying to figure out how to solve the issue.

Row four shows the vote count after the errors were properly identified and ballots were re-tabulated. Clearwater Township was still experiencing issues and had to be added in by hand. Again, contemporary documents and worksheets are clear proof of the situation and work being done.

Row five is the official vote report filed with the state before the certification.

Row six contains the certified election results. These were certified Nov. 21 by the county board of canvassers. The results are virtually the same as the tabulator slips produced on election night with the discrepancies identified and explained in the minutes of their meetings.

Row seven is the results of the complete hand recount conducted on Dec. 17. When a hand recount is done, ballots that were previously unable to be tabulated electronically are sometimes able to be added. These changes are, again, well documented by the workers' notes made during this process.

The Committee states that the data this chart summarizes, coming from the actual election artifacts in Antrim County, clearly and concisely shows that ideas and speculation that the Antrim County election workers or outside entities manipulated the vote by hand or electronically are indefensible. Further, the Committee is appalled at what can only be deduced as a willful ignorance or avoidance of this proof perpetuated by some leading such speculation.

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There were many groups and persons from around the country that focused their attention on Antrim County as the most central point in their arguments and speculation. The county was mentioned by officials at the White House, in media, at rallies, and in several, substantial online documentaries. The Committee investigated the claims made by some of the more prominent groups and individuals.

The Allied Security Operations Group (ASOG) obtained access to the Antrim County voting tabulators and purported to perform a forensic audit. (ASOG and its co-founder were purveyors of the “fractional vote” and “more votes than registered voters” theories²). ASOG’s audit described stolen computer files, machines designed to provide incorrect results, manipulated software, and cyber-attacks. Utilizing the difference between the unofficial vote count and the final, official count, ASOG claimed the machines were inaccurate 68% of the time. However, ASOG never provided an explanation for how the official vote was accurately obtained on the tabulator slips in the same physical count as the incorrect unofficial results on which they focus. ASOG did not make any attempt to invalidate the claims of the clerk by demonstration. ASOG also claimed a loss of files regarding auto-adjudication, a method of curing absentee voter ballots that Antrim County does not utilize as further evidence of fraudulent activity. ASOG claimed the machines had “ranked-choice” balloting turned on when this is not possible on Michigan machines. Other entities (CyberNinjas and Halderman) showed this claim was untrue. ASOG ignored that the simple and most effective way to verify the results is to simply count all ballots by hand. Even after a hand recount verified the results in Antrim County, ASOG refused to retract its assertions.

Attorney Matthew DePerno was retained by an Antrim County resident to pursue legal action against the county and the state regarding the results of the election. Mr. DePerno has subsequently released various reports, videos, and statements regarding the election results, presenting the ASOG report, as well as work by Dr. Douglas Frank and Jeff Lenberg, as primary pieces of evidence. The Committee closely followed Mr. DePerno’s efforts and can confidently conclude they are demonstrably false and based on misleading information and illogical conclusions. In one recent video, Mr. Lenberg demonstrated how a hacked machine will incorrectly count ballots (reporting it on the official results printout) and how a hacked computer will show inaccurate results. However, neither of these demonstrations shows the explanation given by the clerk is untrue, nor do they explain how the actual official results sheet *did not* match the inaccurate unofficial results. Most critically, it does not explain how the hand recount verified the official results reported by the tabulators on election night. They simply proved hacked machinery will perform incorrectly. This is not evidence machines were hacked, and it is certainly not evidence that machines that performed correctly were hacked.

Further, the insinuations made depend on the tabulators being hacked *after* the logic and accuracy tests. Mr. DePerno, and others, insisted this was possible because the Dominion machines in Antrim County have modems or wireless chips installed. However, this is indisputably false. Antrim County did not utilize modems or any internet or wireless network to transmit voting results *ever*. This incredibly conclusive fact, along with the hand recount of the ballots, serve as the irrefutable bulwarks against all allegations. The cited proof of modems is from a quote for purchasing received by the county from Dominion, not an actual purchase receipt or physical sighting of any modems.

² The “more votes than voters” theory, repeated by President Trump’s attorney, Rudolph Giuliani, was based on an affidavit from the ASOG co-founder that cites several Michigan counties where there were allegedly more votes than registered voters. However, the affidavit cited several townships in Minnesota, not Michigan. Even if the document referenced the right state, the claims regarding the Minnesota townships still were not accurate, according to data from the Minnesota Secretary of State.

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Mr. DePerno's lawsuit, Exhibit 6, highlighted by former state Sen. Patrick Colbeck in a web post dated April 9, 2021 and entitled "Modem Chips Embedded in Voting System Computer Motherboards," feature a voting machine that is not used by Antrim County. Yet the suit draws the connection that the existence of such a machine, one that is not in Antrim County and not manufactured by Dominion at all, is evidence that the Dominion tabulators in Antrim County have the same technology. Committee members and others have been frequently approached by constituents who have been convinced that this is true of the Antrim County machines and all Dominion machines in general.

On June 11, internet and social media sources proclaimed the newest announcement from Mr. DePerno about Antrim County. However, the information provided appeared to be already available, but simply presented in a different light. The first allegation related to evidence of the clerk's Election Management System (EMS), a software package installed on her computer to manage the election. This is the same program that incorrectly reported the results on election night because it had not been properly updated with the late changes to ballots from certain precincts. **EMS is not connected to the tabulators.** The allegations focused on how the clerk's computer and the program were remotely accessed in the days following the election. This should not surprise anyone as the clerk, secretary of state, and the software company sought to determine what went wrong and how to fix it. At no time would this connection or activity have had an impact on the tabulators. More relevant, it could not have changed the tabulator slips, shown in the second chart, line one.

The June 11 video from Mr. DePerno also included what he concluded was dramatic evidence about specially made ballots, sent to Republican areas, that would more frequently fail in the tabulators. He then said such ballots would be sent to adjudication, where someone could determine them as Biden votes, even if they were not. This pronouncement is simply more blatherskite. Adjudication takes place with both Democrat and Republican workers, observers, and challengers present (Antrim County had no concerning or reported issues related to their challengers). Also, Antrim County did not have a high incidence of adjudicated ballots. Most important is the now repeated point of lines one and seven on the second chart above: the original tabulator slips and the hand recount match with only a few documented and easily explained ballot differences, dispelling any legitimacy to speculation of massive vote stealing by human or computer means.

The Committee finds such actions to be misleading and irresponsible, diminishing the overall credibility of those asserting this conclusion.

Dr. Frank has also worked independently of Mr. DePerno, appearing in various other reports and programming. He claimed his findings of patterns in voting demographics and results, along with disparities between census, registration, and ballot totals in given areas were conclusive evidence of a complex computer hack and conspiracy to manipulate vote counts around the nation. This theory, like Dr. Shiva's, alleged the installed "algorithm" switches or steals votes just enough to succeed while not being enough to raise suspicions. However, Dr. Frank's conclusions are not sound for several reasons. Census data is not recent, and people do not only move away (as he frequently contends) but others do move into an area. Coupled with same day registration,

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the notable red flags he spotted in the data are easily explained, e.g. young people do not vote as readily as older citizens, people's movements create disparities between registrations and the census, etc. The patterns he sees are not unexpected or unusual to elections or human behavior in general. His theories depend on the ability to hack into the tabulators before or during and/or at the end of the election. Many of the counties he and others identified as having been hacked do not even have modems or make any online connection to submit results. Those that do, do not connect the modem, which is physically separate from the Dominion tabulator, until *after* the polls are closed and the tabulators have printed the official results.

Events in Antrim County sparked a significant amount of concern about the technology used to count ballots. This concern led to much speculation, assumptions, misinformation, and in some cases, outright lies meant to create doubt and confusion. The many hours of testimony before the Committee showed these claims are unjustified and unfair to the people of Antrim County and the state of Michigan. It has also been unfair to people across America. The simple answer to all of this remains the most reasonable conclusion: human error and lack of training are the factors that contributed to inaccurate unofficial vote counts. These errors were quickly discovered and rectified by the protective and redundant systems our state has built to verify and protect election integrity, *including re-countable, paper ballots*. Even more significantly, the official vote count was never in doubt and was validated several times, including during a complete, hand recount.

While extremely disappointed and frustrated with the obvious avoidable errors, the Committee commends the efforts of the Antrim County clerk, staff, and many volunteers that corrected these errors and gave their time for the canvass and hand recount. The Committee also recommends legislation strengthening the law regarding the conducting of logic and accuracy tests prior to the election, including penalties for failing to do so. The Committee recommends the attorney general consider investigating those who have been utilizing misleading and false information about Antrim County to raise money or publicity for their own ends. The Committee finds those promoting Antrim County as the prime evidence of a nationwide conspiracy to steal the election place all other statements and actions they make in a position of zero credibility.

6. Operating Issues with Tabulators and Precinct Computers

Speculation and theories of fraud in the election appear most prevalent in the areas concerning voting tabulators, computers, software, hardware, and cybersecurity. In the testimony and information reviewed by the Committee, claims ranged from something as simple as "spikes" in the vote count that exceeded the physical capacity of the tabulators to machines that were simply inaccurate. However, more complex claims also emerged, claiming that tabulators were intentionally designed to manipulate the tally through fractional voting or swapping by hand, through software, or by cyber attacks that based their manipulation on the votes necessary to overcome candidate Joe Biden's early deficit to President Trump.

Dominion Voting Systems, Election Systems & Software (ES&S), Hart InterCivic

Michigan utilizes tabulators and election services provided through three different vendors, with the individual counties determining which vendor to use. All vendors must meet the specifications of the state's election laws which requires vendors to meet guidelines provided by the United

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States Election Assistance Commission (EAC). The EAC has rigorous standards regarding construction, material and code sourcing, reviews, and independent auditing conducted by certified third parties.

The Committee interviewed, under oath, the CEO of Dominion Voting Systems and the vice president of systems security & chief information security officer from ES&S. Hart InterCivic submitted written testimony. Despite many public denunciations of their collective testimony as inaccurate, no individual has provided any evidence to the Committee of such perjury or has filed any action in a court of law asserting such.

Mr. John Polous, Dominion CEO, denied multiple rumors regarding the company and provided references to verify his testimony that the company was not involved in elections in Venezuela and had no connection to Hugo Chavez, Nancy Pelosi, Diane Feinstein, or George Soros. He also denied the existence of Dominion servers in Spain and Germany, emphasizing that ballots remain local, are counted locally, and are not moved over state lines, let alone overseas.

Mr. Polous explained in detail how the operations of the Dominion machines are not compatible with the various theories being promoted, and that any of the accusations regarding counting ballots multiple times or scanning surplus ballots would easily be uncovered due to the poll books being unbalanced. Further, ballots that required auto-adjudication or duplication are accounted for in the poll books and create a computer log that is checked to prevent or detect double counts. Damaged ballots that require duplication are logged and could not be accidentally tabulated due to the damage that required the duplication.

Fractional Voting

The early allegation of fractional voting was supported by a few photographs which appeared to be screen shots from computer screens running the Dominion software. The chair specifically called for this information during public testimony as its existence would have been a profound demonstration of proof. However, despite numerous, repeated requests from the chair and assurances from those making the allegation, no proof, whether by demonstration or verifiable citation, was ever offered to or obtained by the Committee.

Internet Connections

Many observers insisted the vote tabulators at the TCF Center were connected to the internet. Chris Thomas, who served as the senior elections advisor for the city of Detroit, has asserted that this is simply not true. Other individuals who were at the TCF Center, such as former state Sen. Patrick Colbeck, insist that they were. It is true that every tabulator was connected to a local area network (LAN), which would create the same icon on a computer screen indicating a network connection as is shown by an internet accessible network. This may be a source of some of the confusion. Computers at the central control center, which were not connected to each precinct's LAN, were connected to a network that was connected to the internet, which may have also contributed to the confusion. Regardless, no evidence has been offered that the tabulators were connected beyond each LAN, and, in fact, the results from the tabulators at the TCF Center were transmitted to the clerk's office via flash drives, not electronic or cellular connection. Furthermore,

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and more importantly, there has been no evidence provided that such a purported connection led to alterations to machine programming, hardware, or the tabulated results or could have led to such changes. Finally, logic and accuracy tests are conducted on each tabulator prior to the election to confirm that pre-election procedures were followed properly. During the post-election audits, clerks verify that those tests were performed and that the machines and their programming were not tampered with during the election.

Many theories and speculation regarding tabulators not at the TCF Center also include a component that necessitate an internet connection. It is particularly important to note that Dominion voting machines that are not part of an absentee voter counting board do not have built in modems or wireless internet. Reports to the contrary are false, with some falsely labeling non-Dominion machines as Dominion machines to make it appear as if they do have wireless internet capabilities. The secure cellular modems some clerks use to transmit the unofficial results to the county clerk are not even turned on or connected to the tabulators until *after* the official results are printed by the individual machine.

Tabulator/Software Integrity

There is no link in the election process chain more susceptible to unprovable and un-refutable speculation and suspicion than those involving the invisible lines of code and panels of circuits. These vulnerabilities can include tampering with machine code on site, via cyber attack, or by malicious programming by the proprietors of the machines.

There are many theories as to how compromising the integrity of the machines and software could have taken place, making it impossible to delineate each one separately. However, the answers and evidence against nearly all theories is generally the same. Reasonable deduction and logic stand to refute nearly all possible outcomes of a hack or attack, including the following theories: whether files including ballot images were hacked, a malicious algorithm was installed to switch votes, or a hostile, foreign force obtained a connection into a tabulator before, during, or after the election. In all of these situations, a simple recount or re-tabulation by the machine, after a logic and accuracy test, or by hand would demonstrate the theory to be consistent or inconsistent with the facts. This has been undertaken in multiple jurisdictions, both those in question and those not, all providing verification of the original, official results. Not one of these efforts demonstrated a problem with the tabulators or the software. There is no evidence to suggest the original, official results reflected anything but what was marked on the ballots.

Videos and reports of the ease of hacking current Dominion voting machines from outside of Michigan, e.g. Georgia, never demonstrated a vulnerability of the vote counting software or the tabulators. The chair contacted various officials from Georgia to understand the testimony and events in question there. Particularly, the testimony of Jovan Pulitzer, which purported to have on-the-spot access to manipulate voting files and vote counts, has been demonstrated to be untrue and a complete fabrication. He did not, at any time, have access to data or votes, let alone have the ability to manipulate the counts directly or by the introduction of malicious software to the tabulators. Nor could he spot fraudulent ballots from non-fraudulent ones. Notably, Georgia did conduct a complete, statewide, hand recount that validated the tabulators' official results.

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Many of the theories surrounding cyber attacks were consolidated into the visuals and narratives included in the “Absolute Proof” video series first presented in January 2021 and continuing into June 2021 by Mike Lindell (the video relied heavily on the situation in Antrim County and the report from ASOG). In summary, Mr. Lindell claims that attacks by foreign and domestic enemies were successful in obtaining access to the computers containing results at local and county clerks’ offices, as well as the secretary of state. In some cases, the supposed access included the actual tabulators.

However, this narrative is ignorant of multiple levels of the actual election process. Upon completion of the election, tabulators print the final results on paper. Clerks then connect a modem and transmit by secure, cellular connection or transfer by flash drive the unofficial results to the county clerk.³ County clerks then report these unofficial results both locally and to the secretary of state. The secretary of state releases the unofficial results to media and their own page. Clarity, a Spanish based company, also takes in these unofficial results from the county or the state. This company, which is based in Spain and has servers in Europe, makes the unofficial results available to multiple users, especially media subscribers who utilize the unofficial results in their election night prognostications. Scytel and others are companies that provide similar services. All of these activities, especially due to media inquiries, constitute a significant explanation for much of the cyber activity across the country and the globe on election night.

Terminologies about the equipment used in elections leads to much of the confusion, particularly when used carelessly. Various documents, emails, and manuals discuss connectivity and servers. Certain persons have used these as proof that tabulators were connected during the election. However, the capabilities of the machines do not denote all of those options were operating during the election itself. Server connections and vulnerabilities, even errors, at clerk’s offices are not indicative that tabulators themselves were vulnerable or hacked. The presence of IP addresses do not prove votes were altered or programming was hacked. Servers have nothing to do with regular tabulators during the election.

While the clear and constant presence of cyber criminals is real, the exchange of “packets” of information between two computers speaking to each other is not evidence of successful hacking or changing of data. Moreover, it is not possible for anyone to now determine what might have been in those packets of information unless granted specific access to one of the two computers involved in the transaction. All the while, the official results remain on a printed piece of paper at the local clerk’s office and are not alterable to any reverse cyber attack. Most importantly, the paper ballots in the box are available for re-tabulation or recount at any time. Where this was done, no evidence of hacking or attack was ever shown. Nor did any official representative of the losing party call for a hand recount in any precinct so to prove an instance of such. If the losing party had been so confident of any of these cyber attack theories or software-based vote switching, simply asking for several hand recounts or re-tabulations in the various precincts would have demonstrated a genuine hack had happened and that there was necessity for additional recounts and investigations.

³ ES&S and Hart InterCivic tabulators have internal modems, but not Dominion. However, they are not turned on until the polls are closed and tabulation has concluded. It is worth noting that these machines will likely have to be recertified, depending on whether they have 4G or 5G capabilities when the technology changes.

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Further, the graphics and charts in various videos claim very specific access and vote count changes in specific counties across Michigan but do not provide any references or evidence to demonstrate how that information was acquired. As mentioned above, once the data is transmitted, there is no way to know what was sent without access to a computer on either side. No clerk or election official in any of these counties was informed how these numbers were calculated or known (except the numbers shown for Antrim County, which mirror the numbers shown to have occurred by human error). While showing these numbers is compelling, there is no source provided, but the viewer is led to believe Mr. Lindell's experts have received access to each of these counties' or precincts' computers and discovered a connection and hack occurred along with exactly what data was transmitted. No such activities took place at any of these locations with which the Committee had contact.

The chair spoke with clerks in several of the counties listed by Mr. Lindell's experts. These clerks had no explanation for numbers his reports show as being flipped votes, nor had they had any interaction with any persons making these allegations. Moreover, clerks in these counties performed random hand recounts in various precincts or townships and found zero change to the official, canvass results. Other clerks did full county re-tabulations and found zero change. For these actions to not contradict Mr. Lindell's allegations would mean all the clerks surreptitiously or incidentally chose precincts or townships that were not involved with the hack his experts claim occurred or allowed their tabulators to be compromised. The Committee finds this is beyond any statistical or reasonable credulity.

Canvassing and Out of Balance Precincts

The canvassing process that is conducted at the county level in each of Michigan's counties always serves as the check on most irregularities that may occur during the initial tabulation. If paper ballots are significantly unbalanced when compared with the number of votes reported in poll books, this constitutes a clear indication that something went wrong. Often, the imbalance arises when workers do not immediately account for the necessity of copying overseas ballots or damaged absentee voter ballots. It also occurs when a voter decides to leave the polling place without correcting a spoiled ballot or submitting their ballot. Other causes come from empty absentee voter ballot envelopes, or couples including both of their ballots in one envelope.

Some of the highly out-of-balance precincts at consolidated Absentee Voter Counting Boards (AVCB) were likely from mistakes made with the high-speed tabulators, something that several citizens swore to have witnessed in affidavits and other testimony. When these imbalances appear after Election Day, it is the board of canvassers, or in Wayne County, their chosen agent, the clerk, that can make the decision to perform a further review to correct any irregularities that are discovered. Re-tabulation of the paper ballots and a thorough examination of the poll books are critical parts to the canvass process, allowing the books and ballot boxes to reach balance.

Technically, the imbalances that remain after the canvass could exist due to fraudulent activity. Unbalanced precincts are unfortunate and are something that should be addressed in the future. However, the unbalanced precincts in Michigan counties were marginal and, in no way, would have impacted the outcome of the Presidential election. There were fewer precincts with an imbalance

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in this election than in previous ones. **Developing best practices and training election workers on how to maintain balanced precincts is recommended. There is much discussion on allowing some out-of-balance precincts to be eligible for recount but testimony the Committee heard from several clerks indicated they did not support this. Therefore, the Committee makes no recommendations on this issue.**

The Committee did learn during testimony that Wayne County's Board of Canvassers operates differently than most other counties, shifting the actual canvass responsibilities to the county clerk and their staff. Once the canvass is complete, the board receives a report, that is unusually anemic in its details of how imbalances were rectified. This is unfair to those serving on the board, as well as the voters of Wayne County, despite being permitted by law. A transparent canvass, overseen by those not responsible for the actual election process, allows citizens to understand how imbalances occurred and how they were rectified while having confidence that there was not a conflict of interest for those performing the canvass.

Canvassers ought to be intimately involved in the process and the law should be changed to provide consistency and transparency in the canvassing process. Furthermore, it would be wise to allow for larger boards in higher population areas and to provide additional time to complete the canvass to rectify any irregularities.

7. Signature Verification Process

The Committee was made aware of claims that election workers at the TCF Center in downtown Detroit were instructed to not match signatures on envelopes and furthermore were instructed to "pre-date" the received date of absentee ballots. To the contrary, these processing steps — signature matching and verification of the date received — occurred at another location and were completed by other employees prior to the time the ballots were sent to the TCF Center for counting. Workers at the AVCBs are to check for the clerk's signature and time stamp as well as making sure the voter signature is present. However, the validation of the voter signature by the clerk's office is indicated by the clerk's signature and stamp. As for the "pre-dating" allegation, Detroit Senior Election Advisor Chris Thomas explained this date field is necessary for processing the ballot. Without the voter present, there is no way to have that date, which was recorded into the QVF by the official who took the same day registration at another location. Since the poll books at the AVCB are not connected to the QVF during Election Day, there is no way to check what was entered at the site where the voter registered. Therefore, a "placeholder" date is entered, and the poll worker assumes the official accepting the registration did their due diligence.

Kent County Clerk Lisa Lyons, and Ingham County Clerk Barb Byrum, both testified regarding the possible requirement of a "real time" signature when applying for an absentee ballot, indicating it would be highly preferred rather than performing the application process online. In addition to the preferences of election officials, the Michigan Court of Claims struck down Secretary of State Benson's guidance on signature matching, which required workers to presume the validity of signatures, ruling that the required presumption of validity is found nowhere in state law and mandating such was a direct violation of the Administrative Procedures Act.

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After reviewing these facts and receiving the testimony of experts and clerks, it is abundantly clear that the signature verification process is one of significant importance. With new policies in place due to the adoption of Proposal 18-3, current election procedures do not require a new voter to, potentially, ever make face-to-face contact with an election official or staff throughout the process of registration, requesting an absentee ballot application, or completing and submitting their ballot. Therefore, requiring a voter to confirm their identity at some point during the process is imperative. Whether providing a “real time” signature, a government-issued photo identification card, or other unique personally identifying information, like a driver’s license number or a state identification number, requesting that a voter provide one of these easily-accessible identifiers will go a long way to strengthen the integrity of our system, while supporting the new, more efficient way of administering our elections.

Therefore, the Committee recommends that the secretary of state begin the process of establishing actual rules for examining and validating signatures consistent with a ruling of the Michigan Court of Claims. The Committee also recommends that statewide measures be put in place to ensure eligible voters are not unreasonably denied access to vote if there is an issue with their signature. Finally, the Committee recommends that reasonable measures be put in place to ensure voters can easily and properly identify themselves when exercising their right to vote.

8. Jurisdictions Reporting More Than 100% Voter Turnout

The Committee received and heard claims that jurisdictions had more than 100% of registered voters voting. Here are some of the local municipalities that had claims of a higher voter turnout than there were actual registered voters:

<i>Municipality</i>	<i>Claim</i>	<i>Actual</i>
Oneida Township	118%	Approximately 80%
Zeeland Township	460.51%	Precincts ranged from 74.46% - 84.80%
Spring Lake Township	120%	Precincts ranged from 66.74% - 84.15%
Gladwin Township	215.21%	67.23%
Summit Township	Over 100%	71%
Detroit	More Votes than Voters (Trump Claim)	250,138 votes = Under 50% of registered voters in the city and only 37% of the total population.

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9. Absentee Ballots Were Tabulated Multiple Times, Increasing Vote Total

Some individuals claimed that many ballots were counted multiple times when they were re-submitted through the high-speed tabulation machines. The Committee heard from several persons and read many affidavits claiming to have first-hand knowledge that this issue occurred. Investigation does show it is possible to cycle a completed stack through the tabulator multiple times as long as no errors occur. Bundles of ballots go through the tabulator so quickly that a simple jam or other error necessitates the entire bundle being restarted. Workers cannot restart the stack unless they first clear the partial count and start from zero by pressing a button.

If ballots were counted multiple times, this would have created a significant disparity in the official pollbook. This was the testimony of several witnesses, including Chris Thomas and Monica Palmer, Republican chair of the Wayne County Board of Canvassers. Specifically, the pollbook would show that many more votes were cast than the number of people obtaining a ballot. This was the case at several counting boards at the completion of the original tabulation. However, the actual imbalances that remained after the canvass show this problem was rectified. Rectifying precincts where this mistake happened is usually not difficult to do and involves taking the ballots out of the box, counting the total number to see if it matches the poll book, and processing all the ballots through the tabulator again. The balanced poll books and the remaining imbalances do not indicate this problem any more, showing it was corrected. Remaining imbalances are likely connected to some of the other reasons addressed in finding number six, namely, empty envelopes, ruined ballots, etc.

The Committee recommends that tabulator companies develop machines that place tabulated ballots into a box that has no access for poll workers while placing uncounted ballots in another tray to be checked and placed in the tabulator when ready. This would assure such an error cannot occur and that no reset and restarting of a full stack is necessary.

10. Thousands of Ballots Were “Dumped” at the TCF Center on Election Night/The Next Morning

Several individuals testified and claimed that tens of thousands of ballots were “dumped” at the TCF Center on election night, when reported vote tallies showed that President Trump was still in the lead. They allege this occurred between 3 – 5 a.m. and that they were brought onto the floor to be counted. Chris Thomas, the senior elections advisor for the city of Detroit, stated he estimated 16,000 ballots were delivered to the TFC Center around that time. Some other persons and media speculated it was nearly 100,000, but most reported about 30,000-45,000. These ballots were submitted throughout Election Day at different locations, such as drop boxes, in the mail, and at the clerk’s main and satellite offices. After the ballots were compiled and processed at the clerk’s office, after the closing of polls at 8 p.m., they were brought to the TFC Center for counting. These ballots were not brought in a wagon as alleged, but via delivery truck and then placed on carts. A widely circulated picture in media and online reports allegedly showed ballots secretly being delivered late at night but, in reality, it was a photo of a WXYZ-TV photographer hauling his equipment.

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Others claimed that the TCF Center security camera footage around the same time showed some type of “ballot dump.” While the video in question confirms that a number of ballots were delivered at the time alleged, it provides no evidence of fraudulent or wrongful conduct. In the video, the van arrived around 3:30 a.m. and unloaded the absentee ballots. Once unloaded, the van left around 3:55 a.m. to go back to the satellite office where the processing was occurring. The van arrived back once again around 4:30 a.m. to unload the final ballots.

This theory, like many of the other theories proposed as evidence of fraud, does not constitute actual evidence on its own. Those drawing such conclusions in their affidavits and testimony were asked to provide proof that something illegal actually occurred but no proof that ballots were fraudulent was provided or found by the Committee in testimony or in subpoenaed records. However, this situation does raise issues with the delayed and cumbersome process of obtaining absentee ballots from drop boxes on election night, when many other activities and processes are also ongoing. **The Committee recommends that drop boxes not be utilized or be closed earlier than 8 p.m. on Election Day so that the time taken to collect such ballots will not, by necessity, extend processing and tabulating of such a large volume so long into the night. At the least, appointed staff should be on-hand to immediately collect ballots from drop boxes at 8 p.m. Additionally, the process of transferring ballots from the clerk’s office to other locations must be done with greater security and manifests so that there can be an accounting for each ballot sent and received between the two locations, establishing a chain of custody.**

11. Vote Totals Were Abnormal Compared to Past Presidential Elections and Other Vote Count Irregularities

Several claims were made regarding the voter turnout in the November 2020 election in which the statistical data was cited as a source to show widespread election impropriety. Comparing historical results casts serious doubt over any claims of widespread impropriety in the Michigan 2020 election. In fact, turnout in 2020 increased less in Wayne county (11.4%) than in the rest of the state (15.4%) and President Trump won a greater percentage of votes there than he did in 2016 (30.27% vs 29.3%).

Additionally, the data suggests that there was no anomalous number of votes cast solely for the President, either in Wayne County or statewide:

2020

Statewide

President: 5,539,302

Senate: 5,479,720

Difference: 59,582 (1.08% difference)

Wayne

President: 874,018

Senate: 863,946

Difference: 10,072 (1.15% difference)

2016

Statewide

President: 4,799,284

Congress: 4,670,905

Difference: 128,379 (2.67% difference)

Wayne

President: 782,719

Congress: 754,560

Difference: 28,159 (3.60% difference)

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Other Irregularities

Several published reports, particularly “Case for Michigan Decertification” presented charts of vote sub-totals and totals that were adjusted during the night and sometimes subtract votes from previous totals. The report also shows the increase in absentee votes tabulated was greater than the usual amount able to be processed in the given time frame. These reports require partial or incremental vote counts and totals. Finally, the report included final vote counts that include enormous spikes of final votes with a very high percentage for one candidate. Attempts by the chair to acquire the sources and citations of this data from the author were not able to be fulfilled. The author insisted that he cannot answer the questions about the origins of these data points, which he uses as evidence, without others investigating the issue or granting him access to a wide range of materials.

The reports containing these impossible mathematical counts rely on partial or incremental vote counts which are not available from any county or state official. Detroit does set up its own, unofficial vote reporting site. Incremental vote counts are reported during the process at the TCF Center. This additional level of complexity for reporting and handling, along with corrective actions that may be occurring onsite after an incremental data dump, can lead to multiple inaccuracies and discrepancies. There is additional confusion about counts and potential increases or decreases as the city merges actual precinct votes with AVCB votes. **Allowing Detroit to announce partial or incremental vote counts when no other community does, does not promote a uniform, statewide system. Further, not aligning each AVCB with each precinct creates an additional, complexity leading to an unnecessary vulnerability for errors in the unofficial, election night vote reports.** Finally, media outlets frequently make substantial errors or propagate the errors of others and then must adjust and retract data.

Large spikes in the vote count are not necessarily unexplainable or unusual. They do not alone constitute evidence of fraud and can be reasonably expected. Large precincts, particularly with the highest absentee voter turn out ever, took much longer to complete and then reported all their results at once. Further complicating this issue is that the absentee voter ballots counted at a consolidated counting board had to be merged with the votes submitted on Election Day at the corresponding, in- person voting precincts. This makes the spike larger than just the final count from the AVCB. No evidence has been presented to refute this as the legitimate reason for the dramatic jumps in vote counts seen in Michigan.

Regardless, the Committee can only speculate on this because the author of the referenced report cannot provide sources that the Committee can pursue. Without provision of a source to investigate from the author, and as no confirmation of these numbers was provided nor can be ascertained, the Committee does not believe a wide-ranging, blanket allowance to search materials is justifiable or responsible, particularly in light of the extent of the post-election state audit performed and the lack of red flags from the final results in Detroit or Wayne County.

12. Additional Issues

Ballot Box Construction

Testimony was heard from Monica Palmer regarding the roll of boards of canvassers in verifying the construction of ballot boxes. Her board made significant efforts to require repairing or replacing poorly constructed boxes. **This effort is commendable and ought to be extended to the construction of drop boxes, as well. Testimony was also shared that boxes disallowed by the Wayne County Board of Canvassers and labeled to not be used were still being used on Election Day. This is not acceptable, and the Committee asks the secretary of state or the attorney general to investigate who is responsible for this serious breach.**

Modem Usage on Tabulators

Testimony was given regarding the wisdom and necessity of modems for vote tabulators. There was not consensus amongst the clerks and the Committee makes no recommendation at this time. However, the external, detachable modem does provide a reassuring and genuine physical barrier to cyber attacks during the voting process.

Ballot Harvesting

Testimony and allegations of ballot harvesting were made, although no evidence of such was presented. Ballot harvesting has been caught at times in the past, but none was in this election. Drop boxes and prepaid postage do present a greater vulnerability to ballot harvesting. Others have made the argument that prepaid postage might also reduce the likelihood of an individual waiting for someone to collect their ballot. It is worth noting that ballot harvesting, while illegal due to its vulnerability to fraud, is not necessarily indicative of fraudulent voting.

Allegations of Illegal Votes

Testimony and reports of illegal votes, out of state votes, non-residents voting, and deceased voters are prolific, and the numbers included are substantial and compelling. However, no source or reliable method for determining these numbers is presented. References to “317 voters also voting in other states” do not come with explanation or source. Other numbers reported as evidence of fraudulent addresses or issues with residency fail to consider the complications and realities of same day registration (a real problem in its own right, but one voters created through adopting Proposal 3 in 2018). These same day registrations, also addressed earlier in this report, necessitate methods to enter voters into the database while also flagging them for additional checks and verifications later. This is particularly true at the AVCBs as they do not have access to the QVF and their electronic poll books are disconnected during the election. New registrants need lines filled in, but also must be flagged to be connected with the actual entry made in the QVF by the clerk’s office prior to issuing the ballot. Impossible, and obviously contrived, birthdates serve as a rational and simple method for flagging these voters.

Many of the reports and allegations of illegal votes or fraudulent votes conflate issues of illegal or improper process with fraud or illegal votes. Many of these claims ignore the specific and legally required partisan makeup of the election workers and immediately assume that illegally removing watchers and challengers means fraud is occurring and that all ballots should be disqualified.

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Not only would this disenfranchise thousands of legitimate voters by no fault of their own, but it demonstrates a significant leap of logic and an unjustified mistrust of the bipartisan poll workers themselves. The outcome alleged to have occurred during these improperly supervised moments, namely the addition of tens of thousands of prepared ballots, would require a conspiracy of immense proportions: individuals at multiple levels and locations, massive resources of ballot production and pollbook manipulation, and an outcome that does not contain a final number count outside the realms of believability. All of this under the noses of hundreds of bipartisan workers and watchers (as not all were ever dismissed) and without a whisper from the huge pool of people who would know. And all of this to theoretically run up the Biden total in a precinct where he traditionally should have expected better than 90% of the vote but received 88% amidst a relatively unremarkable turnout. **The Committee finds these postulations strain credulity and are simply preposterous. The Committee also notes this theory would directly conflict with the idea the machines were tampered with to miscount the ballots.**

Suspicious Communications

Communications with Dominion to local clerks have been utilized to cause additional fear and mistrust of the company, its equipment, and the election results. While the Committee has not examined or received every document, a small sampling of the most often cited communications are only troubling if considered with the pretext that Dominion is part of a conspiracy to defraud voters. One email after the August primary regarding not saving images is highlighted as evidence of a cover-up. The context in the email, to make electronically transmitting the results after the election with the attachable modem function better, makes the instruction to turn off transmitting the image a reasonable instruction when coupled with there being no law in Michigan to save the images. Emails and communications with Dominion to Antrim County after Nov. 3 are also reasonable as the clerk and others attempted to determine how the tabulators correctly counted the ballots while the clerk's computer showed them incorrectly. **(The saving of ballot images so the ballots can be publicly examined by digital means may be an issue Michigan should consider. Other states are doing this with success.)**

Chain of Custody and Election Material Security

Frequent demands to decertify all or a portion of the vote are accompanied by high sounding language regarding the "chain of custody." This verbiage evokes images of evidence utilized in trials, such as sealed envelopes and locked evidence rooms with sign-out sheets. However, investigating the claims regarding problems with the chain of custody usually finds highlights about the handling and transmission of the unofficial vote counts and the computer systems used to handle them. While concerns about these systems may be justified, it is incredibly misleading and irresponsible to imply this holds any danger to the official vote counts, the tabulators, or the ballots themselves. Similarly, unfair allegations have been leveled against the secretary of state and county and local clerks regarding the instruction to, and deletion of, e-poll book data. The letter instructing this and the action itself is a standard practice, ordered by the federal government and carried out shortly after every election. The law and the letter sent also provide specific instruction not to do so should there be an ongoing legal action regarding the data. All evidence the Committee found shows the law was followed. **The Committee finds insisting this is evidence of a cover up, "Destruction of election artifacts prior to end of 22-month archival requirement," is incredibly misleading, demeaning, and irresponsible.**

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Confusing Terminology

Many of the allegations simply utilize semantics and the confusing, technical nature of elections to drive up doubt. Claims such as “fake birthdays,” “unsupervised ballot duplication,” “system manuals explicitly refer to internet and ethernet connectivity,” and “unsecured and illegal ballot boxes” are just a sampling of the terminologies used. However, each of these has legitimate explanation. The birthday issue is explained elsewhere in this report and involves same day registrations on Election Day. “Unsupervised ballot duplication” is referring to times challengers were unable to watch or were prevented from watching (which were not legal actions) but is misleading because the bipartisan election inspectors/workers were still watching and verifying each other’s work. “System manuals” refer to connectivity because the machines are specifically designed to be connected to transmit the unofficial results and to be connected for other functions – this is not proof they were connected during tabulation. “Unsecured and illegal ballot boxes” refers to the transporting of absentee ballots to the counting board in postal trays. Sealed ballots have never been considered to need to be in a secured and approved container because the envelopes are still sealed. **The Committee recommends this practice be made more secure with manifests and a record of custody**, but it is wrong to accuse anyone of violating the law that was written to address open ballots, *not* those in sealed envelopes.

Blank Ballots and Military Ballots

The presence of blank ballots also provides significant confusion, despite being necessary for the duplication of military ballots and damaged absentee voter ballots. It is noteworthy that attempting to utilize these ballots for any significant level of fraud would require perfectly matching precincts to voters, manipulating poll books with fake dates for requests and receipts of the ballots, voter’s signatures, and the clerk’s signature and time stamp.

One witness testified that none of the military ballots at her table being duplicated were for President Trump. However, upon questioning, the witness recounted she only witnessed a few dozen ballots. This is a very reasonable outcome given the overall performance of the candidates in these precincts and the amount witnessed, which is not statistically significant.

13. Audits

The demand for audits regarding the election began soon after the November election and has continued until now. Several entities have undertaken to conduct audits, sometimes referring to their efforts as “forensic audits.” One of these is detailed earlier in this report, particularly in Finding 5. Several lawsuits regarding audits have been filed.

Proposal 18-3, which was approved by the voters of Michigan and amended the state constitution, guarantees every Michigan elector the right to request an audit, stating that each “elector qualified to vote in Michigan shall have...(t)he right to have the results of statewide elections audited, in such a manner as prescribed by law, to ensure the accuracy and integrity of elections.” The central clause, “in such a manner as prescribed by law,” has resulted in the dismissal of demands of citizens to execute this provided right because the audit performed by the Michigan secretary of state was determined to satisfy this right. Much has been made by several persons that the hand recount in Antrim County was not truly an audit. This is, and was, admitted by the secretary

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of state's office as true in that it was not a precinct audit, but a risk-limiting audit with a risk limit of zero, because all of the ballots were recounted and not just a sample. Furthermore, this does not diminish the profound value of hand recounting every ballot and race in the county as evidence against fraud or other illicitness. However, the actual, mandated audit detailed below was eventually conducted in Antrim County as it was in all Michigan counties.

The audits performed by the Michigan secretary of state and facilitated by county clerks and local officials has faced significant derision by citizens, lawyers, and activist leaders. The accusation is that the secretary of state has a conflict of interest in the result as it is her role as chief election officer which is being judged. However, such allegations demonstrate a significant lack of understanding regarding the rigor and depth of the audit performed, especially its decentralized nature. Auditing of the results is undertaken and administered by the county clerks, with aid and assistance provided by the local city and township clerks, and is another step removed from the secretary of state. The clerks at each of these levels, excepting municipal, are partisans from both major parties.

The extent of the audit is also critical to understanding its dependability and credibility. There are 66 steps clerks are instructed to undertake in the process. The "Post-Election Audit Manual," available online at www.Michigan.gov/sos/post_election_audit_manual_418482_7.pdf, lays out several critical points as to purpose and goals. Notably, they include pre-Election Day and Election Day procedures' fidelity to law and rules. Precincts and races are selected randomly in each county across the state. The audit examines notices, appointments and training, e-Pollbook security, test deck procedures (logic and accuracy testing), military and overseas applications, poll books, and ballot containers. The audit checklist contains 66 points of examination to meet these goals and includes the hand counting of the randomly selected races in randomly selected precincts. Pictured is a completed audit for East Grand Rapids Precinct 5. Citizens can obtain these audit results across the state from their county clerks.

Post-Election Audit Checklist

NOTE: All discrepancies should be explained on the reverse side of this checklist.

County: KENT Jurisdiction: East Grand Rapids Regular Precinct: 5 AV Precinct: ☐ Audit Date: 12/10/2020

Pre-Election Requirements:	
1. Notice of Registration	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Election	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Public Accuracy Test	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Weekend Hours in GVI	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Election Inspectors:	
5. Appointed by Election Commission	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. At least 1 R & 1 D	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Ages available	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8. Proof of Training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9. Proof sent to parties	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E-Pollbook:	
10. Encryption Password	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11. Unique User/Password	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12. PrivacyZone Active	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13. Data Download	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14. Date of Download	11/2/2020
Voting System & Test Deck:	
15. Test Deck Sealed: SN	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16. Seal # Recorded	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
17. Test Deck & T&S Certification	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
18. Tab Seal # Match w/T&S Certification & Pollbook	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
19. Tab Serial # Match w/T&S Certification & Pollbook	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
20. EOC Addendum	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
21. Pre-printed TD-HM	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22. Prelim Test Date:	10/15/2020
23. Public Test Date:	10/26/2020
24. Test Deck Properly Created:	<input checked="" type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input checked="" type="checkbox"/> 6 <input checked="" type="checkbox"/> 7 <input checked="" type="checkbox"/> 8 <input checked="" type="checkbox"/> 9 <input checked="" type="checkbox"/> 10 <input checked="" type="checkbox"/> 11 <input checked="" type="checkbox"/> 12 <input checked="" type="checkbox"/> 13 <input checked="" type="checkbox"/> 14 <input checked="" type="checkbox"/> 15 <input checked="" type="checkbox"/> 16 <input checked="" type="checkbox"/> 17 <input checked="" type="checkbox"/> 18 <input checked="" type="checkbox"/> 19 <input checked="" type="checkbox"/> 20 <input checked="" type="checkbox"/> 21 <input checked="" type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input checked="" type="checkbox"/> 24 <input checked="" type="checkbox"/> 25 <input 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REPORT ON **THE NOVEMBER 2020 ELECTION IN MICHIGAN**

The Committee concludes these audits are far from the worthless exercises they have been castigated as being. Many of those criticizing them are misleading concerned citizens to believe the only audit done is the “risk limiting audit.” The risk limiting audit is also performed on top of the major, statewide county audit detailed above. Its purpose is to perform an *additional* spot check on the accuracy and function of the tabulators, but it is not the main audit done.

The Committee recommends providing live video feed and recordings of the audit procedures. The public should have access to view the audit in person when possible and results should be posted online. The Committee also recommends that the Legislature fulfill the commitment of Proposal 2018-3 to guarantee an audit upon request of any elector.

V. RECOMMENDATIONS AND CONCLUSION

Recommendations

- Place in statute the rights and duties of challengers and poll watchers, requiring they be uniformly trained and held accountable.
- Ensuring combined AVCBs can have more than one challenger per party, with the ability to replace challengers who exit the AVCB location after the sequester is lifted.
- Allow for bipartisan election inspectors for all audits and require the process be open to the public.
- Prohibit the unsolicited mailing of absentee voter ballot applications from the secretary of state to limit the potential for non-Michigan residents voting in elections.
- Establish signature verification requirements via the administrative rules process or statute in order to provide clarity and uniformity to election workers on the proper way to ensure signatures match.
- Require video security on all drop boxes and require all drop boxes be emptied and secured immediately or earlier than 8 p.m. on Election Day to help expedite the processing and tabulation of ballots.
- In order to ensure more accurate voter rolls, allow county clerks greater authority when removing deceased individuals from the Qualified Voter File.
- Allow for the continued pre-processing of absentee ballots the day before Election Day, so long as stringent security measures are kept in place. Pre-processing must occur on the site of tabulation.
- Consider allowing tabulation, which is more secure, to begin in the week preceding Election Day as long as results may not be released until polls are closed on the completion of Election Day.
- Require that best practices for maintaining a balanced precinct on Election Day be part of the necessary training for all precinct workers. Establish a public, published record of all clerks who fail to provide the appropriate training or continuing education to themselves or their employees.
- Reform the canvassing processes by requiring canvassers be present during the canvass activities, expanding certain county boards where population requires it, and provide for additional time for the process to be completed.

REPORT ON **THE NOVEMBER 2020 ELECTION IN MICHIGAN**

Conclusion

The Committee can confidently assert that it has been thorough in examination of numerous allegations of unlawful actions, improper procedures, fraud, vote theft, or any other description which would cause citizens to doubt the integrity of Michigan's 2020 election results. Our clear finding is that citizens should be confident the results represent the true results of the ballots cast by the people of Michigan. The Committee strongly recommends citizens use a critical eye and ear toward those who have pushed demonstrably false theories for their own personal gain. We also conclude citizens should demand reasonable updates and reforms to close real vulnerabilities and unlawful activities that caused much of the doubt and questionability to flourish and could, if unchecked, be responsible for serious and disastrous fraud or confusion in the future.

Further, we commend the innumerable clerks, canvassers, staff, workers, and volunteers across Michigan that make the enormous complexity of elections operate so smoothly, so often. The complexity of the work and the dedication we discovered are astounding and worthy of our sincerest appreciation. We also commend the diligent citizens that took time to report problems and concerns they saw because they want and value fair and free elections above party or personal gain. If all citizens remain vigilant and involved, we will emerge stronger after any challenging time.

Total	2,613	8,267	41	11	31	14	5
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President and Vice President of the United States (Vote for 1)

Precinct	Joseph R. Biden / Kamala D. Harris - DEM	Donald J. Trump / Michael R. Pence - REP	Jo Jorgensen / Jeremy Cohen - LIB	Don Blankenship / William Mohr - UST	Howie Hawkins / Angela Walker - GRN	Rocky De La Fuente / Darcy Richardson - NLP	Write-in
Banks Township, Precinct 1	349	756	11	1	2	1	3
Central Lake Township, Precinct 1	549	906	16	1	6	0	3
Chestonia Township, Precinct 1	93	197	3	0	0	0	1
Custer Township, Precinct 1	240	521	11	2	1	0	0
Echo Township, Precinct 1	198	392	8	1	2	0	0
Elk Rapids Township, Precinct 1	986	1,028	17	4	9	0	2
Forest Home Township, Precinct 1	610	753	19	1	0	1	2
Helena Township, Precinct 1	308	431	4	0	1	1	0
Jordan Township, Precinct 1	183	371	13	1	1	0	2
Kearney Township, Precinct 1	471	743	16	0	3	0	4
Mancelona Township, Precinct 1	276	536	20	0	0	1	1
Mancelona Township, Precinct 2	247	646	13	2	1	0	1
Milton Township, Precinct 1	769	1,021	18	2	0	3	3
Star Township, Precinct 1	161	462	10	0	0	0	0
Torch Lake Township, Precinct 1	462	528	7	1	2	1	0
Warner Township, Precinct 1	60	163	3	0	0	0	1
Total	5,980	9,748	188	18	28	8	23

United States Senator for State (Vote for 1)

Precinct	Gary Peters - DEM	John James - REP	Valerie L. Willis - UST	Marcia Squier - GRN	Doug Dem - NLP	Write-in
Banks Township, Precinct 1	341	785	3	5	2	3
Central Lake Township, Precinct 1	620	933	9	9	3	0

Total

Banks Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	134
Republican Party (Republican):	520
Libertarian Party (Libertarian):	1
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	1
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	656

President and Vice President of the United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	349
Donald J. Trump / Michael R. Pence (Republican):	756
Jo Jorgensen / Jeremy Cohen (Libertarian):	11
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	2
Rocky De La Fuente / Darcy Richardson (Natural Law):	1

Write In 3

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1123

Member of the State Board of Education (2)

Ellen Cogen Lipton (Democrat):	278
Jason Strayhorn (Democrat):	273
Tami Carlone (Republican):	692
Michelle A. Frederick (Republican):	698
Bill Hall (Libertarian):	24
Richard A. Hower (Libertarian):	20
Karen Adams (U.S. Taxpayers):	5
Douglas Levesque (U.S. Taxpayers):	5
Mary Anne Hering (Working Class):	31
Hali McEachern (Working Class):	23
Tom Mair (Green):	17
Write-in:	4
Total Votes:	2070

Regent of the University of Michigan (2)

Mark Bernstein (Democrat):	282
Shauna Ryder Diggs (Democrat):	269
Sarah Hubbard (Republican):	709
Carl Meyers (Republican):	684
James L. Hudler (Libertarian):	16

Governor of Wayne State University (2)

Eva Garza Dewaelsche (Democrat):	277
Shirley Stancato (Democrat):	257
Don Gates (Republican):	702
Terri Lynn Land (Republican):	704
Jon Elgas (Libertarian):	31
Christine C. Schwartz (U.S. Taxpayers):	23
Susan Odgers (Green):	31
Write-in:	5
Total Votes:	2030

County Prosecuting Attorney (1)

James L. Rossiter (Republican):	870
Write-in:	14
Total Votes:	884

County Sheriff (1)

Daniel S. Bean (Republican):	877
Write-in:	20
Total Votes:	897

County Clerk (1)

Sheryl Guy (Republican):	875
Write-in:	8
Total Votes:	883

Total

Central Lake Township, Precinct
1

Straight Party Ticket (1)	
Democratic Party (Democrat):	227
Republican Party (Republican):	536
Libertarian Party (Libertarian):	3
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	3
Green Party (Green):	2
Natural Law Party (Natural Law):	0
Total Votes:	771

Member of the State Board of Education (2)

Ellen Cogen Lipton (Democrat):	457
Jason Strayhorn (Democrat):	443
Tami Carlone (Republican):	807
Michelle A. Frederick (Republican):	824
Bill Hall (Libertarian):	28
Richard A. Hewer (Libertarian):	32
Karen Adams (U.S. Taxpayers):	16
Douglas Levesque (U.S. Taxpayers):	12
Mary Anne Herina (Working Class):	34
Hali McEachern (Working Class):	27
Tom Mair (Green):	17
Write-in:	0
Total Votes:	2697

Governor of Wayne State University (2)

Eva Garza Dewaelsche (Democrat):	414
Shirley Stancato (Democrat):	439
Don Gates (Republican):	825
Terri Lynn Land (Republican):	851
Jon Elgas (Libertarian):	32
Christine C. Schwartz (U.S. Taxpayers):	23
Susan Odgers (Green):	33
Write-in:	1
Total Votes:	2618

Township S for Central Township (1)

Stanley A. Bear (Republican):	
Write-in:	
Total Votes:	

Township C Central Lake Township (1)

Judy Kosloski (Republican):	
Write-in:	
Total Votes:	

Township Tr for Central Township (1)

Andrew Smith (Rep)	
Write-in:	
Total Votes:	

Township Tr Central Lake Township (2)

Patrick Hanlon (Republican):	
Pat Marshall (Rep)	
Write-in:	
Total Votes:	

Justice of St Court (2)

President and Vice President of the United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	549
Donald J. Trump / Michael R. Pence (Republican):	906
Jo Jordensen / Jeremy Cohen (Libertarian):	16
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	6
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	3
Total Votes:	1481

Regent of the University of Michigan (2)

Mark Bernstein (Democrat):	451
Shauna Ryder Diggs (Democrat):	438
Sarah Hubbard (Republican):	845
Carl Meyers (Republican):	807
James L. Hudler (Libertarian):	22
Eric Larson (Libertarian):	28
Ronald E. Graeser (U.S. Taxpayers):	13
Crystal Van Sickle (U.S. Taxpayers):	

County Prosecuting Attorney (1)

James L. Rossiter (Republican):	1082
Write-in:	16
Total Votes:	1098

County Sheriff (1)

Daniel S. Bean (Republican):	1142
Write-in:	21
Total Votes:	1163

County Clerk (1)

Sheryl Guy (Republican):	1109
Write-in:	11
Total Votes:	1120

County Treasurer (1)

Sharon S. Gaudin	
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Total

Chestonia Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	45
Republican Party (Republican):	134
Libertarian Party (Libertarian):	0
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	0
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	179

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	93
Donald J. Trump / Michael R. Pence (Republican):	197
Jo Jorgensen / Jeremy Cohen (Libertarian):	3
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	1
Total Votes:	294

Member of the State Board of Education (2)	
Ellen Cogen Lipton (Democrat):	84
Jason Strashorn (Democrat):	73
Tami Carlone (Republican):	171
Michelle A. Frederick (Republican):	170
Bill Hall (Libertarian):	8
Richard A. Hewer (Libertarian):	2
Karen Adams (U.S. Taxpayers):	4
Douglas Levesque (U.S. Taxpayers):	4
Mary Anne Hering (Working Class):	4
Hali McEachern (Working Class):	4
Tom Mair (Green):	8
Write-in:	5
Total Votes:	537

Regent of the University of Michigan (2)	
Mark Bernstein (Democrat):	77
Shauna Ryder Diggs (Democrat):	81
Sarah Hubbard (Republican):	177
Carl Meyers (Republican):	174
James L. Hudler (Libertarian):	2
Eric Larson (Libertarian):	5
Ronald E. Graeser (U.S. Taxpayers):	5

Governor of Wayne State University (2)	
Eva Garza Dewaelsche (Democrat):	79
Shirley Stancato (Democrat):	80
Don Gates (Republican):	175
Terri Lynn Land (Republican):	175
Jon Elgas (Libertarian):	6
Christine C. Schwartz (U.S. Taxpayers):	6
Susan Odgers (Green):	8
Write-in:	5
Total Votes:	534

County Prosecuting Attorney (1)	
James L. Rossiter (Republican):	216
Write-in:	11
Total Votes:	227

County Sheriff (1)	
Daniel S. Bean (Republican):	233
Write-in:	12
Total Votes:	245

County Clerk (1)	
Sheryl Guy (Republican):	219
Write-in:	12
Total Votes:	231

County Treasurer (1)	
Sherry A. Comben (Republican):	220

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Custer Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	108
Republican Party (Republican):	354
Libertarian Party (Libertarian):	1
U.S. Taxpayers Party (U.S. Taxpayers):	3
Working Class Party (Working Class):	2
Green Party (Green):	1
Natural Law Party (Natural Law):	0
Total Votes:	469

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	240
Donald J. Trump / Michael R. Pence (Republican):	521
Jo Jorgensen / Jeremy Cohen (Libertarian):	11
Don Blankenship / William Mohr (U.S. Taxpayers):	2
Howie Hawkins / Angela Walker (Green):	1
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	0
Total Votes:	775

105th District (1)	
Jonathan Burke (Democrat):	221
Ken Borton (Republican):	534
Write-in:	1
Total Votes:	756

Member of the State Board of Education (2)	
Ellen Cogen Lipton (Democrat):	201
Jason Strayhorn (Democrat):	185
Tami Carlone (Republican):	481
Michelle A. Frederick (Republican):	475
Bill Hall (Libertarian):	23
Richard A. Hewer (Libertarian):	13
Karen Adams (U.S. Taxpayers):	13
Douglas Levesque (U.S. Taxpayers):	5
Mary Anne Hering (Working Class):	15
Hali McEachern (Working Class):	8
Tom Hair (Green):	15
Write-in:	3
Total Votes:	1437

(Democrat):	178
Pat O'Keefe (Republican):	491
Tonya Schuitmaker (Republican):	485
Will Tyler White (Libertarian):	22
Janet M. Sanger (U.S. Taxpayers):	14
John Paul Sanger (U.S. Taxpayers):	8
Brandon Hu (Green):	10
Robin Lea Laurain (Green):	14
Bridgette Abraham-Guzman (Natural Law):	8
Write-in:	2
Total Votes:	1408

Governor of Wayne State University (2)	
Eva Garza Dewaelsche (Democrat):	172
Shirley Stancato (Democrat):	181
Don Gates (Republican):	490
Terri Lynn Land (Republican):	486
Jon Elgas (Libertarian):	25
Christine C. Schwartz (U.S. Taxpayers):	16
Susan Odgers (Green):	20
Write-in:	3
Total Votes:	1393

County Prosecuting Attorney (1)	
James L. Rossiter (Republican):	618
Write-in:	12
Total Votes:	630

County Sheriff (1)	
Daniel S. Bean (Republican):	652
Write-in:	11
Total Votes:	663

Total Votes:	
County S	
Scott Papinea (Republican):	
Write-in:	
Total Votes:	

County Co 5th Distr	
Terry VanAlst (Republican):	
Write-in:	
Total Votes:	

County Co 6th Distr	
Brenda Ricksga (Republican):	
Write-in:	
Total Votes:	

Township for Custer (1)	
Roxann Flake (
Write-in:	
Total Votes:	

Township Custer To	
Stacy Simon (F	
Write-in:	
Total Votes:	

Township for Custer (1)	
Renee Elder (I	
Write-in:	
Total Votes:	

Total Votes:

(495)

Justice of Supreme Court (2)	
Susan L. Hubbard:	23
Mary Kelly:	31
Bridget Mary McCormack:	54
Kerry Lee Morgan:	7
Katherine Mary Nepton:	9
Brock Swartzle:	33
Elizabeth M. Welch:	33
Write-in:	0
Total Votes:	190

Judge of Court of Appeals 4th District Incumbent Position (2)	
Michael J. Kelly:	72
Amy Ronayne Krause:	63
Write-in:	0
Total Votes:	135

Judge of Court of Appeals 4th District Non-Incumbent Position (1)	
Michelle Rick:	80
Write-in:	0
Total Votes:	80

Judge of Circuit Court 13th Circuit Incumbent Position (1)	
Kevin A. Eisenheimer:	83

Total

Echo Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	100
Republican Party (Republican):	230
Libertarian Party (Libertarian):	1
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	1
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	332

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	198
Donald J. Trump / Michael R. Pence (Republican):	392
Jo Jorgensen / Jeremy Cohen (Libertarian):	8
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	2
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	0
Total Votes:	601

Member of the State Board of Education (2)

Ellen Cogen Lipton (Democrat):	175
Jason Strayhorn (Democrat):	169
Tami Carlone (Republican):	351
Michelle A. Frederick (Republican):	361
Bill Hall (Libertarian):	16
Richard A. Hewer (Libertarian):	13
Karen Adams (U.S. Taxpayers):	6
Douglas Levesque (U.S. Taxpayers):	4
Mary Anne Hering (Working Class):	11
Hali McEachern (Working Class):	9
Tom Mair (Green):	3
Write-in:	0
Total Votes:	1118

Regent of the University of Michigan (2)

Mark Bernstein (Democrat):	168
Shauna Ryder Digas (Democrat):	171
Sarah Hubbard (Republican):	361
Carl Meyers (Republican):	352
James L. Hudler (Libertarian):	11
Eric Larson (Libertarian):	13
Ronald E. Graeser (U.S. Taxpayers):	5

Township Trustee for Elk Rapids Township (2)	
Richard D. Hults (Republican):	444
Aaron Isenhardt (Republican):	466
Write-in:	16
Total Votes:	926

Justice of Supreme Court (2)	
Susan L. Hubbard:	68
Michelle Rick:	40
Write-in:	3
Total Votes:	410

Judge of Circuit Court 13th Circuit Incumbent Position (1)	
Kevin A. Eisenheimer:	442
Write-in:	3
Total Votes:	445

Village President for Village of Elk Rapids (1)	
James D. Janisse:	486
Write-in:	15
Total Votes:	501

Village Trustee for Village of Elk Rapids (3)	
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Village Trustee for Village of Elk Rapids, Partial Term Ending 11/06/2022 (1)	
Teresa Fosdick:	513
Write-in:	4
Total Votes:	517

School Board Member for Elk Rapids Schools (3)	
No:	224
Total Votes:	806

Total
Elk Rapids Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	327
Republican Party (Republican):	414
Libertarian Party (Libertarian):	1
U.S. Taxpayers Party (U.S. Taxpayers):	1
Working Class Party (Working Class):	2
Green Party (Green):	1
Natural Law Party (Natural Law):	0
Total Votes:	746

President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	784
Donald J. Trump / Michael R. Pence (Republican):	611
Jo Jorgensen / Jeremy Cohen (Libertarian):	5
Don Blankenship / William Mohr (U.S. Taxpayers):	2
Howie Hawkins / Angela Walker (Green):	5
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	2
Total Votes:	1409

Representative in State Legislature 105th District (1)	
Jonathan Burke (Democrat):	705
Ken Borton (Republican):	661
Write-in:	1
Total Votes:	1367

Member of the State Board of Education (2)	
Ellen Cogen Lipton (Democrat):	681
Jason Strayhorn (Democrat):	636
Tami Carlone (Republican):	594
Michelle A. Frederick (Republican):	607
Bill Hall (Libertarian):	17
Richard A. Hewer (Libertarian):	20
Karen Adams (U.S. Taxpayers):	10

Incumbent Position (1)	
Kevin A. Eisenheimer:	224
Write-in:	5
Total Votes:	229

Village President for Village of Elk Rapids (1)	
James D. Janisse:	221
Write-in:	15
Total Votes:	236

Village Trustee for Village of Elk Rapids (3)	
Douglas Bronkema:	148
Patricia Ann Perlman:	141
Charlie Pryde:	197
Laura Shumate:	188
Write-in:	3
Total Votes:	657

Village Trustee for Village of Elk Rapids, Partial Term Ending 11/06/2022 (1)	
Teresa Fosdick:	234
Write-in:	6
Total Votes:	240

School Board Member for Elk Rapids Schools (3)	
Darryl Antcliff:	166

Total

Elk Rapids Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	81
Republican Party (Republican):	263
Libertarian Party (Libertarian):	5
U.S. Taxpayers Party (U.S. Taxpayers):	1
Working Class Party (Working Class):	0
Green Party (Green):	4
Natural Law Party (Natural Law):	0
Total Votes:	354

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	202
Donald J. Trump / Michael R. Pence (Republican):	414
Jo Jorgensen / Jeremy Cohen (Libertarian):	12
Don Blankenship / William Mohr (U.S. Taxpayers):	2
Howie Hawkins / Angela Walker (Green):	4
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	0
Total Votes:	634

Representative in State Legislature 105th District (1)	
Jonathan Burke (Democrat):	194
Ken Borton (Republican):	410
Write-in:	3
Total Votes:	607

Member of the State Board of Education (2)	
Ellen Cogen Lipton (Democrat):	154
Jason Strayhorn (Democrat):	144
Tami Carlone (Republican):	361
Michelle A. Frederick (Republican):	361
Bill Hall (Libertarian):	29
Richard A. Hewer (Libertarian):	20
Karen Adams (U.S. Taxpayers):	9
Douglas Levesque (U.S. Taxpayers):	7
Mary Anne Hering (Working Class):	19
Hali McEachern (Working Class):	8
Tom Hair (Green):	12
Write-in:	0
Total Votes:	1124

United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	610
Donald J. Trump / Michael R. Pence (Republican):	753
Jo Jorgensen / Jeremy Cohen (Libertarian):	19
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	1
Write-in:	2
Total Votes:	1386

United States Senator for State (1)	
Gary Peters (Democrat):	580
John James (Republican):	782
Valerie L. Willis (U.S. Taxpayers):	4
Marcia Squier (Green):	5
Doug Dern (Natural Law):	2
Write-in:	0
Total Votes:	1373

Representative in Congress 1st District (1)	
Dana Ferguson (Democrat):	532
Jack Bergman (Republican):	817

Forest Home Township, Precinct 1

Total

University of Michigan (2)	
Mark Bernstein (Democrat):	487
Shauna Ryder Dias (Democrat):	482
Sarah Hubbard (Republican):	710
Carl Meyers (Republican):	674
James L. Hudler (Libertarian):	33
Eric Larson (Libertarian):	42
Ronald E. Graeser (U.S. Taxpayers):	8
Crystal Van Sickle (U.S. Taxpayers):	20
Michael Makilal (Green):	23
Keith Butkovich (Natural Law):	8
Write-in:	3
Total Votes:	2490

Trustee of Michigan State University (2)	
Brian Mosallam (Democrat):	471
Rema Ella Vassar (Democrat):	488
Pat O'Keefe (Republican):	713
Tonya Schuitmaker (Republican):	703
Will Tyler White (Libertarian):	43
Janet M. Sanger (U.S. Taxpayers):	21
John Paul Sanger (U.S. Taxpayers):	8
Write-in:	13

Judge of Court of Appeals 4th District Non-Incumbent Position (1)

Sheryl Guy (Republican):	1014
Write-in:	4
Total Votes:	1018

County Treasurer (1)	
Sherry A. Comben (Republican):	1001
Write-in:	4
Total Votes:	1005

County Register of Deeds (1)	
Patty Niepoth (Republican):	983
Write-in:	7
Total Votes:	990

County Drain Commissioner (1)	
Mark Stone (Republican):	981
Write-in:	8
Total Votes:	989

County Surveyor (1)	
Scott Papineau (Republican):	973
Write-in:	4
Total Votes:	977

County Commissioner 5th District (1)	
Terry VanAlstine (Republican):	222
Write-in:	0

Joseph R. Biden / Kamala D. Harris (Democrat):	306
Donald J. Trump / Michael R. Pence (Republican):	431
Jo Jorgensen / Jeremy Cohen (Libertarian):	4
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	1
Rocky De La Fuente / Darcy Richardson (Natural Law):	1
Write-in:	0
Total Votes:	743

United States Senator for State (1)	
Gary Peters (Democrat):	294
John James (Republican):	436
Valerie L. Willis (U.S. Taxpayers):	2
Marcia Squier (Green):	4
Doug Dern (Natural Law):	1
Write-in:	0
Total Votes:	737

Representative in Congress 1st District (1)	
Dana Ferauson (Democrat):	279
Jack Reynolds (Democrat):	280

— PRINTING INTERRUPTED —

Antrim County
Antrim November 2020
Tuesday, November 3, 2020

Tabulator Name
Helena Township, Precinct 1
ICP

Tabulator ID
8

Voting Location
Helena Township

Precinct:

Helena Township, Precinct 1

Poll Opened
Nov 03/2020 06:16:29
Poll Closed
Nov 03/2020 20:01:52
Report Printed
Nov 03/2020 20:11:08

Unit Model: PCOS-320C (Rev 1072)
Unit Serial: ARAJHX0088
Protective Counter: 3126
Software Version: 5.5.3-0002

State Proposal 20-1 (1)	
Yes:	0
No:	0
Total Votes:	0

State Proposal 20-2 (1)	
Yes:	0
No:	0
Total Votes:	0

Certification

WE, THE UNDERSIGNED, WERE
PRESENT DURING THE OPENING OF
THE POLLS AND PRINTING OF THIS
RECORD AND CAN VERIFY THAT ALL
CANDIDATE VOTE TOTALS ARE ZERO
AT THIS TIME.

Constance K. Molloy
Signature
P. Boyce

Non-Incumbent
Position (1)

Michelle Rick:	267
Write-in:	4
Total Votes:	271

Judge of Circuit
Court 13th Circuit
Incumbent Position
(1)

Kevin A. Elsenheimer:	270
Write-in:	1
Total Votes:	271

Board Member for
Charlevoix-Emmet
Intermediate School
District 6 Year Term
(3)

Thelma A. Chellis:	227
Jean E. Frentz:	199
Mary P. Jason:	221
Write-in:	1
Total Votes:	648

Board Member for
Charlevoix-Emmet
Intermediate School
District Partial
Term Ending
12/31/2024 (1)

Larry Cassidy:	250
Write-in:	7
Total Votes:	257

Total

Jordan Township, Precinct 1

Straight Party
Ticket (1)

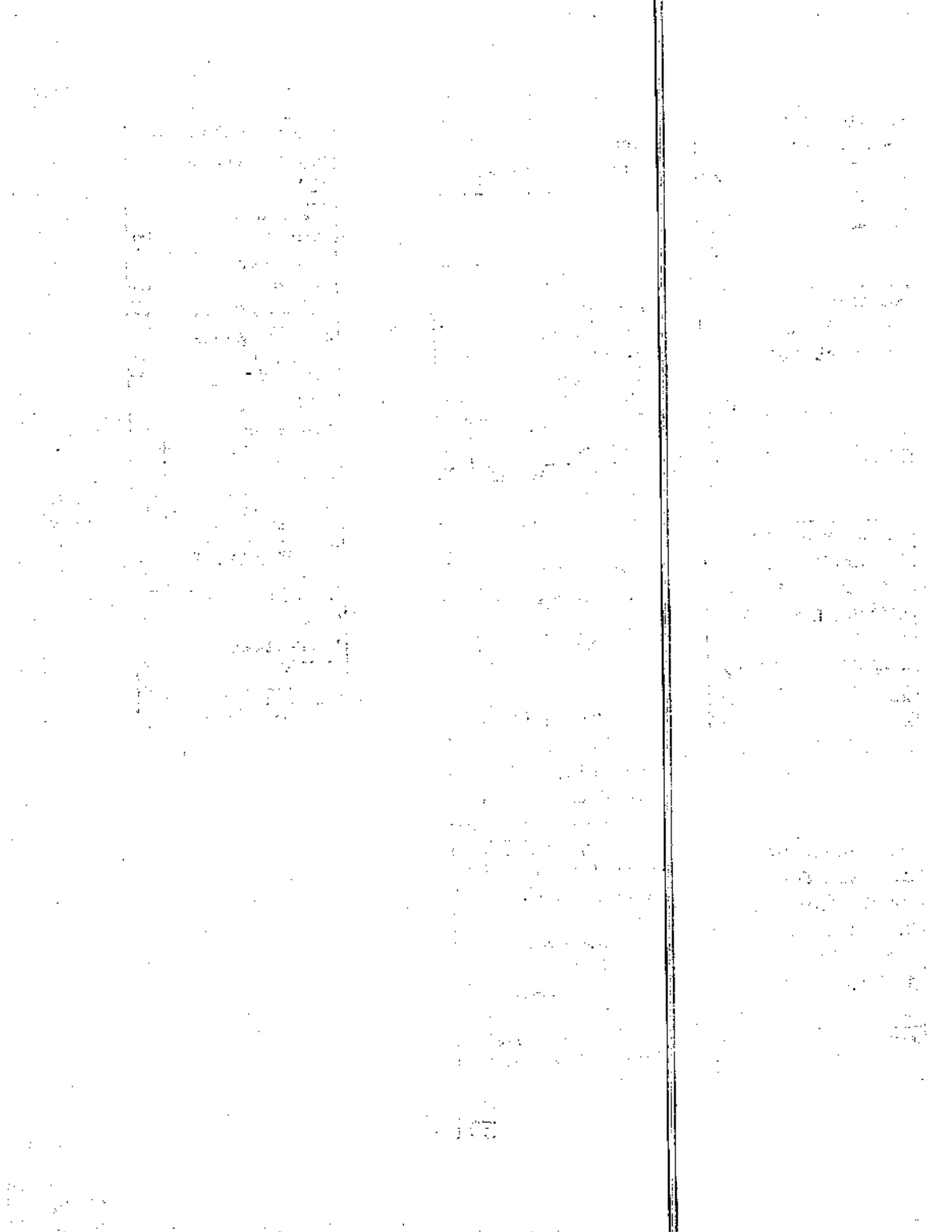
Democratic Party (Democrat):	75
Republican Party (Republican):	252
Libertarian Party (Libertarian):	2
U.S. Taxpayers Party (U.S. Taxpayers):	1
Working Class Party (Working Class):	2
Green Party (Green):	1
Natural Law Party (Natural Law):	0
Total Votes:	333

President and Vice
President of the
United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	183
Donald J. Trump / Michael R. Pence (Republican):	371
Jo Jorgensen / Jeremy Cohen (Libertarian):	13
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	1
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	2

Member of the State
Board of Education
(2)

Ellen Cogen Lipton (Democrat):	165
Jason Strayhorn (Democrat):	154
Tami Carlone (Republican):	334
Michelle A. Frederick (Republican):	337
Bill Hall (Libertarian):	15
Richard A. Hewer (Libertarian):	12
Karen Adams (U.S. Taxpayers):	10
Douglas Levesque (U.S. Taxpayers):	5
Mary Anne Hering (Working Class):	15
Hall McEachern (Working Class):	5
Tom Mair (Green):	4
Write-in:	0
Total Votes:	1056



Straight Party Ticket (1)

Democratic Party (Democrat):	187
Republican Party (Republican):	490
Libertarian Party (Libertarian):	2
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	0
Green Party (Green):	1
Natural Law Party (Natural Law):	0
Total Votes:	680

President and Vice President of the United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	471
Donald J. Trump / Michael R. Pence (Republican):	743
Jo Jorgensen / Jeremy Cohen (Libertarian):	16
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Andela Walker (Green):	3
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	4
Total Votes:	1237

Member of the State Board of Education (2)

Ellen Cogen Lipton (Democrat):	396
Jason Strayhorn (Democrat):	391
Tami Carlone (Republican):	675
Michelle A. Frederick (Republican):	667
Bill Hall (Libertarian):	31
Richard A. Hewer (Libertarian):	21
Karen Adams (U.S. Taxpayers):	7
Douglas Levesque (U.S. Taxpayers):	5
Mary Anne Herind (Working Class):	26
Hali McEachern (Working Class):	22
Tom Mair (Green):	22
Write-in:	0
Total Votes:	2263

Regent of the University of Michigan (2)

Mark Bernstein (Democrat):	401
Shauna Ryder Diggs (Democrat):	379
Sarah Hubbard (Republican):	694
Carl Meyers (Republican):	664
James L. Hudier (Libertarian):	20

Governor of Wayne State University (2)

Eva Garza Dewaelesche (Democrat):	385
Shirley Stancato (Democrat):	390
Don Gates (Republican):	668
Terri Lynn Land (Republican):	685
Jon Elgas (Libertarian):	26
Christine C. Schwartz (U.S. Taxpayers):	17
Susan Odgers (Green):	39
Write-in:	2
Total Votes:	2212

County Prosecuting Attorney (1)

James L. Rossiter (Republican):	893
Write-in:	14
Total Votes:	907

County Sheriff (1)

Daniel S. Bean (Republican):	949
Write-in:	18
Total Votes:	967

County Clerk (1)

Sheryl Guy (Republican):	932
Write-in:	9
Total Votes:	941

Township Treasurer for Mancelona Township (1)	
Jessie Ayoub (Republican):	449
Write-in:	5
Total Votes:	454

Township Trustee for Mancelona Township (2)	
Yousef M. Jabara (Democrat):	120
Rod Vesey (Republican):	415
Donna Gundie-Krieg (Libertarian):	187
Write-in:	9
Total Votes:	711

Township Constable for Mancelona Township (1)	
Linden M. Bielecki (Republican):	448
Write-in:	6
Total Votes:	454

Justice of Supreme Court (2)	
Susan L. Hubbard:	80
Mary Kelly:	109
Bridget Mary McCormack:	208
Kerry Lee Morgan:	79
Katherine Mary Manton:	58

Village Trustee for Village of Mancelona (2)	
Aaron Biehl:	323
Steven Elder:	286
Eugene K. Kerr:	108
Write-in:	8
Total Votes:	725

School Board Member for Mancelona Schools (3)	
Kim Musselman:	330
Tom Ross:	274
Burt Thompson:	264
Write-in:	7
Total Votes:	875

State Proposal 20-1 (1)	
Yes:	419
No:	80
Total Votes:	499

State Proposal 20-2 (1)	
Yes:	446
No:	67
Total Votes:	513

Total
Mancelona Township, Precinct 1

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	276
Donald J. Trump / Michael R. Pence (Republican):	835
Jo Jorgensen / Jeremy Cohen (Libertarian):	20
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	1
Write-in:	1
Total Votes:	1133

United States Senator for State (1)	
Gary Peters (Democrat):	294
John James (Republican):	803
Valerie L. Willis (U.S. Taxpayers):	9
Marcia Squier (Green):	6
Doug Dern (Natural Law):	7
Write-in:	2
Total Votes:	1121

Representative in Congress 1st District (1)	
Dana Ferguson (Democrat):	264
Jack Bergman (Republican):	829

Justice of Supreme Court (2)	
Susan L. Hubbard:	116
Mary Kelly:	215
Bridget Mary McCormack:	304
Kerry Lee Morgan:	65
Katherine Mary Nepton:	99
Brock Swartzle:	226
Elizabeth M. Welch:	165
Write-in:	9
Total Votes:	1199

Judge of Court of Appeals 4th District Incumbent Position (2)	
Michael J. Kelly:	524
Amy Ronayne Krause:	452
Write-in:	13
Total Votes:	989

Judge of Court of Appeals 4th District Non-Incumbent Position (1)	
Michele Rick:	579
Write-in:	9
Total Votes:	588

Judge of Circuit Court 13th Circuit Incumbent Position (1)	
Write-in: 1	

Total

Mancelona Township, Precinct 2

Straight Party Ticket (1)	
Democratic Party (Democrat):	107
Republican Party (Republican):	399
Libertarian Party (Libertarian):	4
U.S. Taxpayers Party (U.S. Taxpayers):	2
Working Class Party (Working Class):	5
Green Party (Green):	1
Natural Law Party (Natural Law):	0
Total Votes:	518

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	247
Donald J. Trump / Michael R. Pence (Republican):	646
Jo Jorgensen / Jeremy Cohen (Libertarian):	13
Don Blankenship / William Mohr (U.S. Taxpayers):	2
Howie Hawkins / Angela Walker (Green):	1
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	1
Total Votes:	910

Member of the State Board of Education (2)	
Ellen Cozen Lipton (Democrat):	214
Jason Strayhorn (Democrat):	204
Tami Carlone (Republican):	554
Michelle A. Frederick (Republican):	557
Bill Hall (Libertarian):	22
Richard A. Hewer (Libertarian):	21
Karen Adams (U.S. Taxpayers):	18
Douglas Levesque (U.S. Taxpayers):	13
Mary Anne Hering (Working Class):	29
Hali McEachern (Working Class):	18
Tom Mair (Green):	4
Write-in:	3
Total Votes:	1857

Regent of the University of Michigan (2)	
Mark Bernstein (Democrat):	220
Shauna Ryder Dicks (Democrat):	203
Sarah Hubbard (Republican):	575
Carl Meyers (Republican):	544
James L. Hudler (Libertarian):	18
Eric Larson (Libertarian):	27
Ronald E. Graeser (U.S. Taxpayers):	13

Antrim County
Antrim November 2020
Tuesday, November 3, 2020

Tabulator Name

Milton Township, Precinct 1

AVCB

Tabulator ID

110

Voting Location

Milton Township

Precinct:

Milton Township, Precinct 1

Poll Opened

Nov 03/2020 06:45:21

Poll Closed

Nov 03/2020 20:22:15

President and Vice
President of the
United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	626
Donald J. Trump / Michael R. Pence (Republican):	543
Jo Jorgensen / Jeremy Cohen (Libertarian):	6
Don Blankenship / William Mohr (U.S. Taxpayers):	2
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	2
Write-in:	0
Total Votes:	1179

United States
Senator for State
(1)

Gary Peters (Democrat):	584
John James (Republican):	583
Valerie L. Willis (U.S. Taxpayers):	2
Marcia Squier (Green):	2
Doug Dern (Natural Law):	1
Write-in:	1
Total Votes:	1173

Representative in
Congress 1st
District (1)

Dana Ferguson (Democrat):	540
Jack Bersman (Republican):	614
Ben Boren (Libertarian):	9

Regent of the
University of
Michigan (2)

Mark Bernstein (Democrat):	496
Shauna Ryder Diggs (Democrat):	493
Sarah Hubbard (Republican):	549
Carl Meyers (Republican):	530
James L. Hudler (Libertarian):	14
Eric Larson (Libertarian):	20
Ronald E. Graeser (U.S. Taxpayers):	3
Crystal Van Sickle (U.S. Taxpayers):	13
Michael Mawilai (Green):	19
Keith Butkovich (Natural Law):	9
Write-in:	2
Total Votes:	2148
Total Votes:	2111

County Prosecuting
Attorney (1)

James L. Rossiter (Republican):	743
Write-in:	11
Total Votes:	754

County Sheriff (1)

Daniel S. Bean (Republican):	782
Write-in:	11
Total Votes:	793

Count

Sheryl

Write-in

Total V

Count

Sherry

(Republ

Write-in

Total V

Count

Deeds

Patty Ni

(Republ

Write-in

Total V

Townshi

for Mil

(1)

Liz Atkins

Write-in:

Total Vote

--- PRINTING INTERRUPTED ---

Antrim County
Antrim November 2020
Tuesday, November 3, 2020

Tabulator Name
Milton Township, Precinct 1
ICP

Tabulator ID
13

Voting Location
Milton Township

Precinct:

Milton Township, Precinct 1

Poll Opened
Nov 03/2020 06:01:49
Poll Closed
Nov 03/2020 20:14:17
Report Printed
Nov 03/2020 20:18:29

Unit Model: PCOS-320C (Rev 1072)
Unit Serial: AAFAJHX0066
Protective Counter: 5352
Software Version: 5.5.3-0002

Total Scanned: 640
Total Voters: 640

President and Vice President of the United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	143
Donald J. Trump / Michael R. Pence (Republican):	478
Jo Jorgensen / Jeremy Cohen (Libertarian):	12
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	1
Write-in:	3
Total Votes:	637

United States Senator for State (1)

Gary Peters (Democrat):	134
John James (Republican):	489
Valerie L. Willis (U.S. Taxpayers):	2
Marcia Squier (Green):	6
Doug Dern (Natural Law):	1
Write-in:	0
Total Votes:	632

Representative in Congress 1st District (1)

Dana Ferguson (Democrat):	116
Jack Bergman (Republican):	501

Regent of the University of Michigan (2)

Mark Bernstein (Democrat):	112
Shauna Ryder Dias (Democrat):	102
Sarah Hubbard (Republican):	458
Carl Meyers (Republican):	437
James L. Hudler (Libertarian):	14
Eric Larson (Libertarian):	20
Ronald E. Graeser (U.S. Taxpayers):	1
Crystal Van Sickle (U.S. Taxpayers):	8
Michael Mawilai (Green):	7
Keith Butkovich (Natural Law):	7
Write-in:	1
Total Votes:	1167

Trustee of Michigan State University (2)

Brian Mosallam (Democrat):	108
Rema Ella Vassar (Democrat):	108
Pat O'Keefe (Republican):	451
Tonya Schuitmaker (Republican):	444
Will Tyler White (Libertarian):	21
Janet M. Sanger (U.S. Taxpayers):	4
John Paul Sanger (U.S. Taxpayers):	4
Brandon H. (Green):	6

County Clerk

Sheryl Guy (Repub
Write-in:
Total Votes:

County Treas

Sherry A. Comben (Republican):
Write-in:
Total Votes:

County Regis Deeds (1)

Patty Niepoth (Republican):
Write-in:
Total Votes:

County Drain Commissioner

Mark Stone (Republ
Write-in:
Total Votes:

County Survey

Scott Papineau (Republican):
Write-in:
Total Votes:

Star To:

Precinct:

Star Township, Precinct 1

Precinct:

Star Township, Precinct 1

Straight Party Ticket (1)

Democratic Party (Democrat):	67
Republican Party (Republican):	299
Libertarian Party (Libertarian):	0
U.S. Taxpayers Party (U.S. Taxpayers):	1
Working Class Party (Working Class):	0
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	367

President and Vice President of the United States (1)

Joseph R. Biden / Kamala D. Harris (Democrat):	161
Donald J. Trump / Michael R. Pence (Republican):	462
Jo Jorgensen / Jeremy Cohen (Libertarian):	10
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	0
Total Votes:	633

Write-in:	0
Total Votes:	632

Representative in Congress 1st District (1)

Ellen Cogen Lipton (Democrat):	147
Jason Strayhorn (Democrat):	125
Tami Carlone (Republican):	390
Michelle A. Frederick (Republican):	395
Bill Hall (Libertarian):	11
Richard A. Hewer (Libertarian):	3
Karen Adams (U.S. Taxpayers):	8
Douglas Levesque (U.S. Taxpayers):	5
Mary Anne Hering (Working Class):	22
Hali McEachern (Working Class):	12
Tom Mair (Green):	8
Write-in:	3
Total Votes:	1129

Eric Larson (Libertarian):	9
Ronald E. Graeser (U.S. Taxpayers):	7
Crystal Van Sickle (U.S. Taxpayers):	7
Michael Mawilai (Green):	5
Keith Butkovich (Natural Law):	4
Robin Lee Laurin (Green):	4
Bridgette Abraham-Guzman (Natural Law):	0
Write-in:	3
Total Votes:	1101

Governor of Wayne State University (2)

Eva Garza Dewaelsche (Democrat):	133
Shirley Stancato (Democrat):	136
Don Gates (Republican):	391
Terri Lynn Land (Republican):	401
Jon Elgas (Libertarian):	10
Christine C. Schwartz (U.S. Taxpayers):	11
Susan Odgers (Green):	9
Write-in:	3
Total Votes:	1094

County Prosecuting Attorney (1)

James L. Rossiter (Republican):	507
Write-in:	5
Total Votes:	512

County Sheriff (1)

Daniel S. Bean (Republican):	525
Write-in:	7
Total Votes:	532

Write-in:	
Total Votes:	

County R Deeds (1)

Patty Niepot (Republican):	9th Dis
Christian M (Republican):	
Write-in:	
Total Votes:	

Townshi for Sta (1)

Robert Mars	
Write-in:	
Total Votes:	

Townshi Star To

Phyllis Ho (Republican):	
Write-in:	
Total Vote	

Townshi for Sta (1)

Tammi Full	
Write-in:	
Total Vote	

es:	4
	188

Register of (1)	
epoth can):	188
n:	4
otes:	192

by Drain	
issioner (1)	
one (Republican):	182
in:	4
Votes:	186

ty Surveyor (1)	
Papineau	
ilican):	180
in:	4
Votes:	184

ty Commissioner	
District (1)	
Bargy (Republican):	180
in:	6
Votes:	186

ship Supervisor	
Torch Lake	
ship (1)	
rt Cook (Republican):	177
e-in:	5
il Votes:	182

Susan L. Hubbard:	18
Mary Kelly:	72
Bridget Mary McCormack:	113
Kerry Lee Morgan:	13
Katherine Mary Nepton:	6
Brock Swartzle:	70
Elizabeth M. Welch:	56
Write-in:	2
Total Votes:	350

Judge of Court of Appeals 4th District Incumbent Position (2)	
Michael J. Kelly:	140
Amy Ronayne Krause:	135
Write-in:	4
Total Votes:	279

Judge of Court of Appeals 4th District Non-Incumbent Position (1)	
Michelle Rick:	145
Write-in:	2
Total Votes:	147

Judge of Circuit Court 13th Circuit Incumbent Position (1)	
Kevin A. Eisenheimer:	144
Write-in:	3
Total Votes:	147

Total
Torch Lake Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	143
Republican Party (Republican):	297
Libertarian Party (Libertarian):	3
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	2
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	445

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	462
Donald J. Trump / Michael R. Pence (Republican):	526
Jo Jorgensen / Jeremy Cohen (Libertarian):	7
Don Blankenship / William Mohr (U.S. Taxpayers):	1
Howie Hawkins / Angela Walker (Green):	2
Rocky De La Fuente / Darcy Richardson (Natural Law):	1
Write-in:	0

999

(1)	
Yes:	122
No:	26
Total Votes:	148

Total

Warner Township, Precinct 1

Straight Party Ticket (1)	
Democratic Party (Democrat):	35
Republican Party (Republican):	106
Libertarian Party (Libertarian):	0
U.S. Taxpayers Party (U.S. Taxpayers):	0
Working Class Party (Working Class):	0
Green Party (Green):	0
Natural Law Party (Natural Law):	0
Total Votes:	141

President and Vice President of the United States (1)	
Joseph R. Biden / Kamala D. Harris (Democrat):	60
Donald J. Trump / Michael R. Pence (Republican):	163
Jo Jorgensen / Jeremy Cohen (Libertarian):	3
Don Blankenship / William Mohr (U.S. Taxpayers):	0
Howie Hawkins / Angela Walker (Green):	0
Rocky De La Fuente / Darcy Richardson (Natural Law):	0
Write-in:	1
Total Votes:	227

105th District (1)	
Jonathan Burke (Democrat):	56
Ken Borton (Republican):	166
Write-in:	0
Total Votes:	222

Member of the State Board of Education (2)	
Ellen Cogen Lipton (Democrat):	53
Jason Strayhorn (Democrat):	49
Tami Carlone (Republican):	141
Michelle A. Frederick (Republican):	145
Bill Hall (Libertarian):	3
Richard A. Hewer (Libertarian):	4
Karen Adams (U.S. Taxpayers):	3
Douglas Levesque (U.S. Taxpayers):	3
Mary Anne Hering (Working Class):	3
Hali McEachern (Working Class):	5
Tom Mair (Green):	3
Write-in:	0
Total Votes:	412

Regent of the University of Michigan (2)	
Mark Bernstein (Democrat):	50
Shauna Ryder Diss (Democrat):	49
Sarah Hubbard (Republican):	146
Carl Meyers (Republican):	142
James L. Hudler (Libertarian):	5
Eric Larson (Libertarian):	3
Ronald E. Graeser (U.S. Taxpayers):	2

Brian Mosallam (Democrat):	48
Rema Ella Vassar (Democrat):	48
Pat O'Keefe (Republican):	152
Tonya Schuitmaker (Republican):	140
Will Tyler White (Libertarian):	4
Janet M. Sanger (U.S. Taxpayers):	4
John Paul Sander (U.S. Taxpayers):	3
Brandon Hu (Green):	2
Robin Lea Laurain (Green):	3
Bridgette Abraham-Guzman (Natural Law):	3
Write-in:	0
Total Votes:	407

Governor of Wayne State University (2)	
Eva Garza Dewaelsche (Democrat):	50
Shirley Stancato (Democrat):	47
Don Gates (Republican):	146
Terri Lynn Land (Republican):	147
Jon Elgas (Libertarian):	5
Christine C. Schwartz (U.S. Taxpayers):	6
Susan Odgers (Green):	3
Write-in:	1
Total Votes:	405

County Prosecuting Attorney (1)	
James L. Rossiter (Republican):	178
Write-in:	2
Total Votes:	180

County Sheriff (1)	
Daniel S. Bean	

Mark S
Write
Total

Cour
Scott (Repu
Write
Total

Cour
7th
Dawn (Repu
Write
Total

Tow
for (1)
Marti (Repu
Write
Total

Tow
War
Panel (Repu
Write
Total

Tow
for (1)
Lori (Repu
Write
Total

Scott, Taylor

From: Joe Otto <joeotto@conservative-daily.com>
Sent: Tuesday, November 10, 2020 6:15 PM
To: Taylor Scott
Subject: RE: Voter Fraud Follow Up
Attachments: Capture31.PNG; Capture32.PNG; Capture33.PNG; Capture34.PNG; Capture35.PNG; Capture36.PNG; Capture37.PNG; Capture38.PNG; Capture39.PNG; Capture40.PNG; Capture41.PNG; Capture42.PNG; Capture43.PNG; Capture44.PNG; Capture45.PNG; Capture46.PNG; Capture47.PNG; Capture48.PNG; Capture49.PNG; Capture50.PNG; Capture51.PNG; Capture52.PNG; Capture53.PNG; Capture54.PNG; Capture55.PNG; Capture56.PNG; Capture57.PNG; Capture58.PNG; Capture59.PNG; Capture60.PNG

Follow Up Flag: Follow up
Flag Status: Flagged

From: Joe Otto <joeotto@conservative-daily.com>
Date: Sunday, November 8, 2020 at 8:23 PM
To: Aven Lyons <aven@cuttinpen.com>, Andrew Lyons <alyons@transwest.com>
Subject: FW: ERIC COOMER 3

Joe Otto

e: joeotto@conservative-daily.com
w: advocacytoaction.com
conservative-daily.com



From: Joe Otto <joeotto@conservative-daily.com>
Date: Sunday, November 8, 2020 at 3:22 PM
To: Max McGuire <maxjmcguire@gmail.com>
Subject: ERIC COOMER 3

**Exhibit
PX 0109**
Oltmann

Joe Otto

e: joeotto@conservative-daily.com

w: advocacytoaction.com
conservative-daily.com

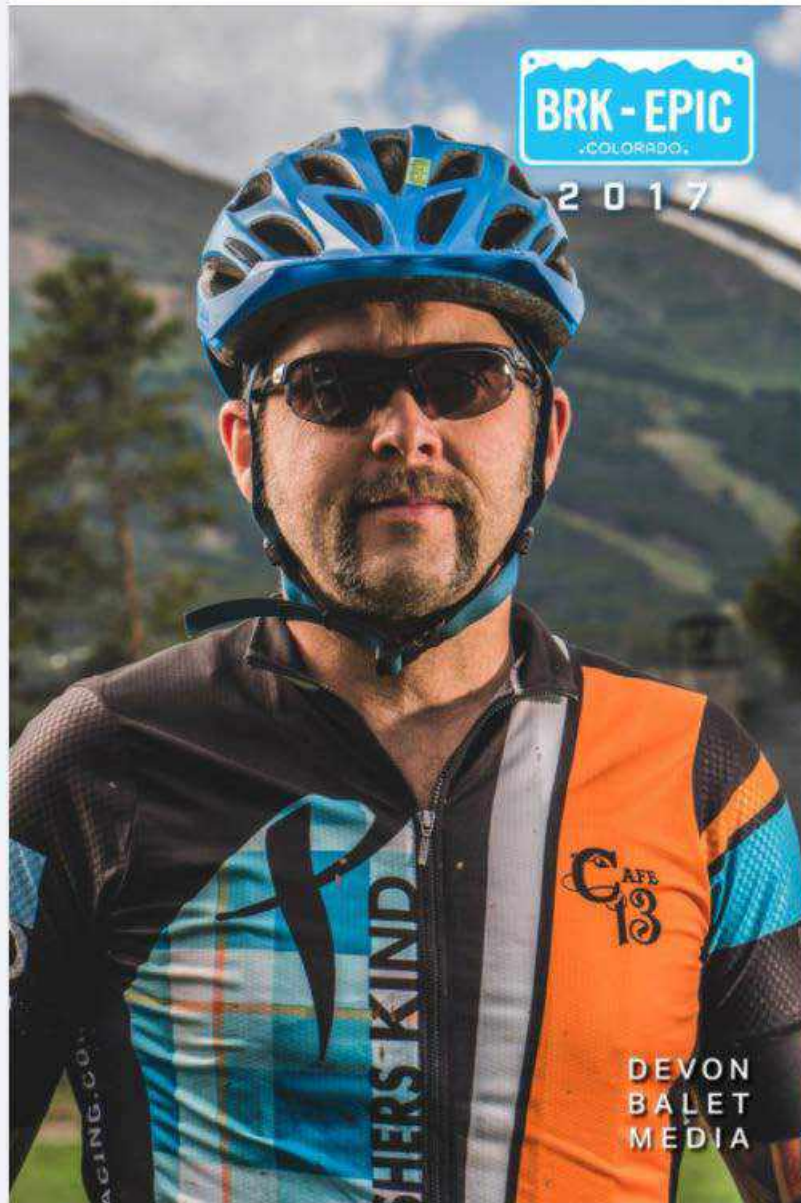




Breck Epic is with Eric Coomer.

September 13, 2018 · 🌐

...





Eric Coomer

August 25, 2018 · 1



Facebook, I truly hate you. But Tom Frost and Jeff Lowe... You inspired me to no end over the last 28 years... Fortunate enough to have met you both. Peace out...



YOUTUBE.COM

David Bowie - Heroes

Music video by David Bowie performing "Heroes". Taken from the ...



10



Matt Crane is with Eric Coomer and 33 others.

...

August 22, 2018 · 🌐

Had an fantastic time at the Colorado County Clerk's Association Summer Conference in Salida this week. So honored to serve with all Clerks, our staffs, and industry partners as we work to improve the services we provide to our citizens. And a very special thank you to the amazing Chaffee County Clerk [Lori Mitchell](#) for hosting us!



👍❤️ 79

1 Comments 1 Share

👍 Like

💬 Comment



Lynn Bartels

The picture of that kiss makes me laugh.

...

👍 · 🗨️ · 📧

👍❤️🤔 7



Eric Coomer

July 22, 2018 · 🌐

...



The Church of the SubGenius

*ETERNAL SALVATION or
TRIPLE your money back!*

PRIVATE GROUP · 32,931 MEMBERS

The Church of the SubGenius



7

1 Share

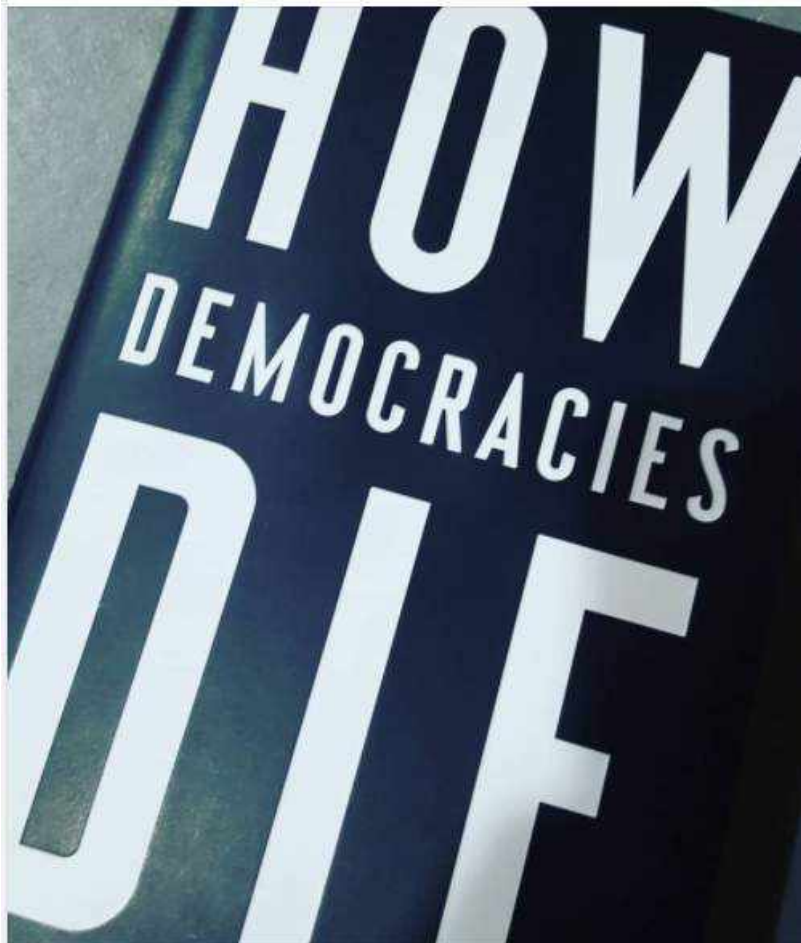


Eric Coomer

January 28, 2018 · 🌐



"This is how elected autocrats subvert democracy—packing and 'weaponizing' the courts and other neutral agencies, buying off the media and the private sector [hello tax cuts 2017]... And rewriting the rules of politics to tilt the playing field against opponents. The tragic paradox of the electoral route to authoritarianism is that democracy's assassins use the very institutions of democracy—gradually, subtly, and even legally—to kill it." [#Resist](#) [#deathoftheamericandream](#) [#wa...](#) See More



👍 18

4 Comments



18

4 Comments

Like

Comment



Marjo Curgus

I just posted an article by same authors. I want to read it! I'll buy drinks and we can toast to the US becoming a 3rd world oligarchy.

...

Like · Reply · 2y

1



Eric Coomer

This is a seriously depressing read... I did ride my bike today, but the gravity well of depression is deep.

...

Like · Reply · 2y



Luke Harrison

Oh. Someone's written a book about my cynical paranoid opinion on democracy? Truth! We're all screwed. The electoral cycle is the new reality TV "give them games"

...

Like · Reply · 2y



Garth Prosser

Ughhh! Not enough coffee to chase these blues. And no snow to help either

...

Like · Reply · 2y



Eric Coomer
September 14, 2017 · Pahrump, NV · 🌐

...

And in other news... There be some serious fuckery going on right here fueled by our Cheeto-in-chief stocking lie after lie on the flames of Kobach... You want something serious to worry about? This is it.

[WASHINGTONPOST.COM](#)

The voting commission is a fraud itself. Shut it down.

 7

1 Comment · 1 Share

 Like

 Comment

 Share



Carl Gable
The good news is we have a very competent special prosecutor doing relentless and complete investigation. I'm an optimist, his day will come.

...

[Like](#) · [Reply](#) · 3v



Eric Coomer

July 9, 2017 · 🧑

Ah... Texas... The land of racists, idiots, and misogynists. In 2 hours I've heard, "what's wrong wif hav'n a ralationship with another pow'rful kuntry (Russia) ?" "I luuv trump", "goddamn Wimmen jus' dun know hor' ta liss'n", "ya know darlin', you're pretty, wish I didnt have to tip you, them robots is comin'"

#fuckyou

👍🤔🤔 25

7 Comments

👍 Like

💬 Comment



Carol O'Connor Coomer

Where are you? Thought you were in IN? TX Airport on way home? Don't judge a "people" by their Airport weirdos! We still love TX. and the family members in it, tho I guess many do have different ideas, at least they lost the PA ones. 😊

Like · Reply · 3y



Jeremy Woolf

Yeah I don't know what the fuck. Last night we had to listen to a drunk bunch of em talking loudly bout their fucking golf games at a sushi restaurant. They should be required to have visas to come here

Like · Reply · 3y

👍 1



Jeremy Woolf

Except Trip, if Eric F won't renew his work visa, I'll hide that dude in my basement but I'd have to move my beer into the garage. 😊

Like · Reply · 3y

👍 2



Garth Prosser

One in a pickup almost clipped me in breck this week. Second TX truck to almost take me out in breck

Like · Reply · 3y

🤔🤔 2



Teak Simonton

Ha! Aye yaye! Hang in there and hope you get back to civilization soon!

Like · Reply · 3y



Eric Coomer
June 15, 2017 · 1



BOOM! Awesome!!!! Salida peeps, make sure you are currently registered to vote!

It's easy!



Heart of the Rockies Radio News

June 15, 2017 · 1

P.T. Wood announces candidacy for Salida Mayor.

Some 350 people gathered last night at the SteamPlant for the kick-off to FIBArk, the Salida Chamber of Commerce's Business After Hours.

One of those in attendance was Salida business man and current chairman of the Salida Planning and Zoning Commission P.T. Wood. Wood took the opportunity to announce to Heart of the Rockies Radio News of his intention to run for the position of Mayor of Salida.



Heart of the Rockies Radio News

June 15, 2017 · 📶

P.T. Wood announces candidacy for Salida Mayor.

Some 350 people gathered last night at the SteamPlant for the kick-off to FIBArk, the Salida Chamber of Commerce's Business After Hours.

One of those in attendance was Salida business man and current chairman of the Salida Planning and Zoning Commission P.T. Wood. Wood took the opportunity to announce to Heart of the Rockies Radio News of his intention to run for the position of Mayor of Salida.

Wood said in his announcement, "I've been in Salida for almost 30 years and I've opened a number of businesses like Moonlight Pizza and now Woods High Mountain Distillery. I've been involved in the community over those years, 10 years on the Planning and Zoning Commission with the last 6 years as chairman. The natural progression of that in my thinking is to run for mayor. I am running for Mayor of Salida, Colorado.

I think I bring a lot of meeting management skills to the job. I've been able to run consensus building and fairly compact meetings in planning and zoning over the years, meetings that brought different view points together in the middle. I think that's a skill I can bring to the office of mayor.

I am looking forward to hearing ideas, thoughts and concerns of the citizens of Salida and being their Mayor.

Wood will have a presence on Facebook beginning today, search Wood for Mayor. You can send him an email at ptwoodmayor@gmail.com.



Eric Coomer

June 1, 2017 · 1 person

...

Irony level: Expert

Email response from my letter to the EPA regarding the trumpet withdrawing the US from the Paris Climate Accord

Pruitt, Scott via usepa.onmicrosoft.com

7:17 PM (11 minutes ago)

to me

Thank you for your email message.

Promoting and protecting a strong and healthy environment is among the lifeblood priorities for the government. The U.S. Environmental Protection Agency is vital to that mission. I am proud to lead this agency, and I seek to listen and learn as we address the issues we face as a nation.

I believe we can grow our economy and harvest the resources we are blessed with while also being good stewards of the air, land and water by which we have been favored.

Together with the dedicated public servants at the EPA and our state partners across this great country, we can and will achieve clean air and water and strong economic growth and job creation. I hope you will visit www.epa.gov to learn more about our work and to follow our progress.

My staff will follow up in response to your email as necessary and appropriate.

Respectfully yours,

E. Scott Pruitt

EPA Administrator



EPA.GOV

US EPA

United States Environmental Protection Agency



1 Comment



Eric Coomer

November 8, 2016 · 1

...

Fuck you Britain, we beat your ass again. We rule! We'll see your silly brexit and raise you an insane orange narcissist racist xenophobic clown! UST UST UST!

👍👎👍 40

14 Comments · 6 Shares

👍 Like

💬 Comment



Dave Brothers

Don't forget misogynist.

...

Like · Reply · 3y

👍 2



Richard Lynch

I thought we were thick as pig shit but you guys just punch us out the ring!

...

Like · Reply · 3y

👍 2



Michael Coomer

Are you drinking yet?

...

Like · Reply · 3y

👍 1



Eric Coomer

Still working, soon...

...

Like · Reply · 3y



Michael Coomer

I am so far ahead of you at this point. Literally the only victory tonight.

...

Like · Reply · 3y



Jason Miles

you guys totally rule, man.

...

Like · Reply · 3y

👍 1



Andrew Simkin

Yes, we have been trumped by the US.

...

Like · Reply · 3y

👍 1



Carl Gable

Darkness descends upon us.

...

Like · Reply · 3y

👍 1



Eric Coomer

I have words and yet I don't have words. Fuck me, fuck

Like · Reply · 3y



Andrew Simkin
Yes, we have been trumped by the US. ***
Like · Reply · 3y  1



Carl Gable
Darkness descends upon us. ***
Like · Reply · 3y  1



Eric Coomer
I have words, and yet, I don't have words. Fuck me... fuck us... how did a billionaire daddy's boy somehow become the beckon of the "common man"???? How the fuck do I have actual relatives/family that gladly donned the "brown shirt"? And I'm a relative... See More ***
Like · Reply · 3y  2



David Hatchner
Sad, but this made me laugh till I had tears in my eyes. Although I think I'm laughing and crying at the same time. ***
Like · Reply · 3y



Tim Kirkus
Are you fucking kidding me? What the hell is going on over there? Eric. Please. Sort it out would you? ***
Like · Reply · 3y



Tim Kirkus
<http://www.thedailymash.co.uk/.../relieved-britain-no...> ***



THEDAILYMASH.CO.UK
Relieved Britain no longer biggest f**k-up of 2016

Like · Reply · 3y



Michael Maniglia
Ha ***
Like · Reply · 3y



Dominic Kleijnen
Unfuckinbelievable! Never thought of this! 🤔 ***
Like · Reply · 3y  1



Eric Coomer
November 8, 2016 · 

...

T-15 minutes to show time folks...
[#2016results](#) [#widemargins](#) [#norecounts](#)

 103 Comments

 Like Comment



Marjo Curgus
Hashtag wide margins! Ha ha ha! ...

 1

Like · Reply · 3y



Eric Coomer
From a professional standpoint, it's my one and only hope for tonight... ...

 1


Like · Reply · 3y



Luke Harrison
Irony is that if it were leaning the other way he'd be screaming "rigged"
I wonder when the last time they were free and fair actually was. I doubt it was in the 20th century. ...

Like · Reply · 3y


OAN 000020



Elizabeth Caswell Dyer
November 8, 2016 · 🧑🏻‍🦱


...


[Eric Coomer?](#)



Denver Now
November 8, 2016 · ⚙️


BREAKING..







[KDVR.COM](#)
All voter registration systems down in Colorado, Denver Elections Office reports


3 Comments


 Like


 Comment



Eric Coomer
Nope, the VR system in Colorado (score and webscore) was created and is run/maintained by the state, not a vendor.
...
Like · Reply · 3y



Elizabeth Caswell Dyer
I figured you would know the scoop on this!
...
Like · Reply · 3y  1



Eric Coomer
Reportedly back online as of a couple minutes ago.
...

OAN 000021



Eric Coomer is at 69 W. Washington Cook County Building.



November 8, 2016 · Chicago, IL · 🧑🏿🧑🏻

Nothing like a real city shoeshine



👍😂😭 27

15 Comments



Like



Comment



Rachel Woolf

You are wearing Swiftwicks with your fancy shoes aren't you?



👍😂😂 27

15 Comments

👍 Like

💬 Comment



Rachel Woolf

You are wearing Swiftwicks with your fancy shoes aren't you? ...

Like · Reply · 3y

👍 1



Mindi Hoffmaster ...



Like · Reply · 3y

👍 1



Eric Coomer

Shiiiiit, not just any Swiftwick Socks, Breck Epic swiftwick socks! ...



Like · Reply · 3y

👍 8

↪ View 1 more reply



8

Like · Reply · 3y



Kevin M. Eitel
Class! Pure class!!!

...

Like · Reply · 3y

1



Mindi Hoffmaster
Fancy!

...

Like · Reply · 3y



Geoffrey Cushing-Murray
Monk strap fence climbers. Rad

...

Like · Reply · 3y

1



Carol O'Connor Coomer
Why not!??!!!

...

Like · Reply · 3y



Kevin M. Eitel
There is nothing better than an old-fashioned shoe shine... Used to get my boots shined all the time in NYC (WTC lobby) or DC... Hard to find someone good at shining western boots, so you always go back to the same person... A true craft!

...

Like · Reply · 3y

1



Eric Coomer
The guy's in the basement here are the real deal.
Never miss the opportunity.

...

Like · Reply · 3y

1



Aaron Salskov
Single Monk

...

Like · Reply · 3y



Rick Littlefield
Horrible to have another man shine your shoes. Capitalist canker.


...

Like · Reply · 3y



Eric Coomer
I tip better than your broke-ass ever could hope to do. I do honest work and share my good fortune instead of being a racist piece of shit that plus bad

...

 Monk strap fence climbers. Rad
Like · Reply · 3y  1


 Carol O'Connor Coomer
Why not!?!?!
Like · Reply · 3y

 Kevin M. Eitel
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Like · Reply · 3y  1

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Like · Reply · 3y  1

 Aaron Salskov
Single Monk
Like · Reply · 3y

 Rick Littlefield
Horrible to have another man shine your shoes. Capitalist canker.
Like · Reply · 3y

 Eric Coomer
I tip better than your broke-ass ever could hope to do. I do honest work and share my good fortune instead of being a racist piece of shit that plays bad music.
Like · Reply · 3y · Edited  2

 Rick Littlefield
Where do you get this "plays bad music" shit? If you are going to insult me, get your facts straight, pretty boy.
Like · Reply · 3y



Eric Coomer

November 8, 2016 · 🌐



I will most definitely have this up and running today



BUZZFEED.COM

A Zoo Is Streaming Red Pandas All Day To Help You Escape The Election



8

1 Comment



Like



Comment



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Eric Coomer

not even the pandas are helping



Like · Reply · 3y



Eric Coomer

November 8, 2016 · 1



Paul DeGregorio

November 8, 2016 · 1

Read my blog in today's St. Louis Post-Dispatch and get out and vote today. Your participation with strengthen our democracy.



STLTODAY.COM

Voters can trust the results of our presidential election

In recent weeks questions have been raised as to whether the presi...





Eric Coomer

November 7, 2016 · 🌐



Well goddamn... this sums it up perfectly, although I am fundamentally incapable of really feeling what this is like. Protest all you want, if HRC had a penis... you fuck head, chuckle fuck's wouldn't have boo to say. I'd respect you more (still less) if you'd admit the obvious. Happy voting. A pox upon us all in these self inflicted end times. The world didn't need a magical non-existent being, just an ignorant populace and a suitable demagogue to bring the apocalypse.



Sandra Swalin

November 7, 2016 · 🌐

"It isn't just an insult to Hillary Clinton that she wound up facing Trump. It's an insult to all women; it's confirmation of our darkest suspicions about sexism... [See More](#)



GLOBALCOMMENT.COM

Goodbye to all that: I'm done with Election 2016

The long and painful US election is almost at an end, and Sady Doy...



Eric Coomer

November 4, 2016 · 🌐

Where's the uproar? Hypocrites. Charlatans. Morally bankrupt. Welcome to the new normal.



HUFFINGTONPOST.COM

BREAKING: Giuliani Confirms The FBI Leaked Information To The Trump Campaign

👍❤️👎 15

8 Comments 1 Share



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Comment



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Peter Archer
Incredible

...

Like · Reply · 4y



Roger See
CNN confirms Rudy And several unnamed FBI agents met for Donuts at a unnamed New York airport and discussed the odds of Chicago winning the World Series. Confirmed by unnamed source.

...

Like · Reply · 4y



2



Roger See
Oops that's SEENN 🤔

...

Like · Reply · 4y



1



Eric Coomer

"What does drive enthusiasm for Trump? According

...
met for Donuts at a unnamed New York airport and discussed the odds of Chicago winning the World Series. Confirmed by unnamed source.

Like · Reply · 4y



Roger See
Oops that's SEENN 🤔

...

Like · Reply · 4y



Eric Coomer
"What does drive enthusiasm for Trump? According to the American National Election Survey, the best determinant of whether someone is a Trump supporter—even more than Republican Party affiliation—is if they think President Barack Obama is a Muslim. Eig... See More

...

TABLETMAG.COM

Why Character, Not Race, Class, or Political Ideology,...

Like · Reply · 4y



Adam Rongey
Tool bags!

...

Like · Reply · 4y



Roger See
Perhaps the more intriguing question ,what fuels the enthusiasm for Hillary Clinton, please enlighten for I seek more light.

...

Like · Reply · 4y



Scott Wimberley
I guess it is mostly a desire not to hand our country over to a buffoon.

...

Like · Reply · 4y



Luke Harrison
Clinton running your country is really scary. Trump at the helm is utterly terrifying. Some people don't see it that way, but they're both pretty bad news.

...

Like · Reply · 4y

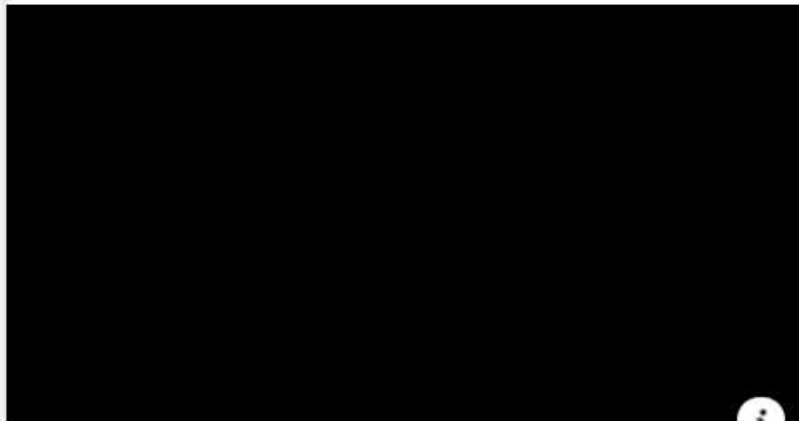


Penelope Chester

November 2, 2016 · Toronto, ON, Canada · 🌐



Lol...Dominion friends, this is for you: "According to Premier Election Solutions, the manufacturer of the new Citadel electronic voting machine, each unit features an easy-to-navigate interface, keeps accurate and secure tallies of votes, and is constructed with durable Kevlar buttons, a shatter-resistant Plexiglas screen, and a reinforced titanium housing, ensuring the devices are able to endure sustained blunt force trauma from voters' fists and elbows as well as repeated puncturing attempts from sharp objects wielded by exasperated citizens." [Eric Steven David](#) - is this the next gen? 😊



THEONION.COM

New Heavy-Duty Voting Machine Allows Americans To Take Out Frustration On It Before Casting Ballot



Eric Coomer and 1 other



Like



Comment



Share



Eric Coomer

October 31, 2016 · 🌐

...

Fucking clowns



👍 🤔 🤔 30

6 Comments

👍 Like

💬 Comment

➦ Share

View 1 more comment



Mindi Hoffmaster

You are gonna traumatize the kids! ...

Like · Reply · 4y · Edited

👍 1



Eric Coomer

Yes, that IS the goal... ...

👍 3



Eric Coomer

October 29, 2016 · 1



<http://www.msn.com/.../donald-trump.../ar-AAjB6wt...>

"We don't do that stuff." Oh... oh but "you" do...

<https://www.google.com/.../trump-supporter-charged.../.....> See More



MSN.COM

Donald Trump Questions Veracity of Ballot Counting in Colorado



8

1 Share





Eric Coomer

October 20, 2016 · 1 person

...

diagnosis of this level from a very short, if entertaining gif/capture is suspect at best, but damn, this be some Proustian level shit right here: "It's the image of a man who knows he has fucked it all up yet again—a man who cannot escape himself, whose body is fighting to blow itself apart. Yes, he is on television and he knows people are watching, but for once he appears to be incapable of caring. This is Trump distilled to the bitter despair that is the essence of his per... See More



SLATE.COM

The Agonizing Essence of Donald Trump, in One GIF

A few months ago, I decided to conduct an experiment: I plopped ...



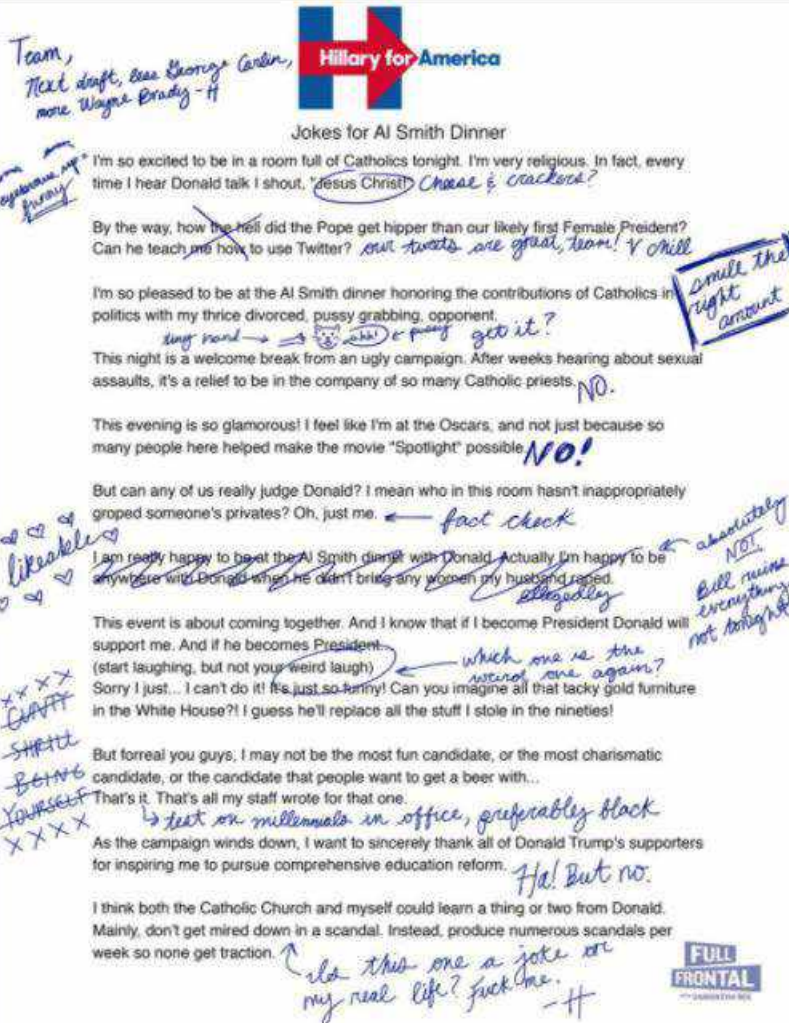
5



Eric Coomer

October 20, 2016 · 🌐

#comedygold



Full Frontal with Samantha Bee 🇺🇸

October 20, 2016 · 🌐

This came straight from our private fax line with Julian Assange.
Information has not been authenticated.



Eric Coomer

October 20, 2016 · 🧑

...

"I would like to promise and pledge to all of my voters and supports and to all of the people of the United States that I will totally accept the results of this great and historic presidential election. If I win."
Donald J. Trump 10/20/2016

If this does not terrify you, I have no words for you. Make no mistake, these are the words of a dictator. There is no legitimate electoral process that does not end with the result that he (Trump) demands.

👍👎👨 12

19 Comments

👍 Like

💬 Comment



Eric Coomer

we'll be lucky if November 9th provides a conclusion...

...

Like · Reply · 4y

👍 1



Jason Miles

pretty sure he's stolen Mugabe's material there.

...

Like · Reply · 4y

👍 1



Bob Ternes

I can't wait until the \$100 million banknotes.

...

Like · Reply · 4y



Andy Marker

Yea, he can say all he wants, but come Nov 9th..what's he gonna do? Stomp his feet? Hold his breath until he turns blue? The rest of the country, and Hillary, the winner, will move forward and all his campaign staff will move onto the unemployment line. It's not a requirement to concede - the US government will just move on and hopefully let him crawl back into his hole..

...

Like · Reply · 4y



Eric Coomer

Procedurally, he can do a few things that could have immediate impacts- recounts being #1. States have statutes for automatic recounts, but candidates can request a recount at any time- with associated costs. This alone could have devastating effects o... [See More](#)

...

👍 3

← Search

**Exhibit
PX 0110**
Oltmann

Photos



Eric Coomer

...

4d • [icons]

Just fucking vote! And if you voted
for a fascist- friend, family, or foe,
fucking un-trump me. I've got no
truck for racists

i

YOUTUBE.COM

Stiff Little Fingers - Suspect Device

I do not own rights to this song . Lyrics:...

👍 8



Like



Comment



Share



Eric Coomer

...





JOINT STATEMENT FROM ELECTIONS INFRASTRUCTURE GOVERNMENT COORDINATING COUNCIL & THE ELECTION INFRASTRUCTURE SECTOR COORDINATING EXECUTIVE COMMITTEES

Original release date: November 12, 2020

WASHINGTON – The members of Election Infrastructure Government Coordinating Council (GCC) Executive Committee – Cybersecurity and Infrastructure Security Agency (CISA) Assistant Director Bob Kolasky, U.S. Election Assistance Commission Chair Benjamin Hovland, National Association of Secretaries of State (NASS) President Maggie Toulouse Oliver, National Association of State Election Directors (NASED) President Lori Augino, and Escambia County (Florida) Supervisor of Elections David Stafford – and the members of the Election Infrastructure Sector Coordinating Council (SCC) – Chair Brian Hancock (Unisyn Voting Solutions), Vice Chair Sam Derheimer (Hart InterCivic), Chris Wlaschin (Election Systems & Software), Ericka Haas (Electronic Registration Information Center), and Maria Bianchi (Democracy Works) - released the following statement:

“The November 3rd election was the most secure in American history. Right now, across the country, election officials are reviewing and double checking the entire election process prior to finalizing the result.

“When states have close elections, many will recount ballots. All of the states with close results in the 2020 presidential race have paper records of each vote, allowing the ability to go back and count each ballot if necessary. This is an added benefit for security and resilience. This process allows for the identification and correction of any mistakes or errors. **There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised.**

“Other security measures like pre-election testing, state certification of voting equipment, and the U.S. Election Assistance Commission’s (EAC) certification of voting equipment help to build additional confidence in the voting systems used in 2020.

“While we know there are many unfounded claims and opportunities for misinformation about the process of our elections, we can assure you we have the utmost confidence in the security and integrity of our elections, and you should too. When you have questions, turn to election officials for answers.”

trusted voices as they administer elections.”

TLP:WHITE

###

Topics: Election Security

Keywords: CISA, Election security

Last Published Date: November 12, 2020

TLP:WHITE

When my team preserved material from Eric Coomer we did so because of his connection to Antifa, not because of his connection to Dominion -which we didn't even know existed before.

The Antifa manifesto published here by Eric Coomer is addressed as a would be press release thus acting as a public relations officer for Antifa. There is no other example of this manifesto anywhere on the Internet.

While the election is certainly an issue, I was / am determined to document and tell the truth about Antifa and their actions. Eric Coomer is a member of Antifa.

During the phone call with Eric Coomer on the line with other known members of Antifa nationwide, one of the Antifa members spoke about finding and killing me -that was end of last year.

April 2021, KarmaOneSixOne (by whatever name his account number was at the time) posted a bounty for my life. The FBI called me to warn me. Local police in Denver spoke to me about a vacation.

Some other relevant information between the April bounty and now will be discussed in the Declaration.

On [@YourDaddyJoey](#) you will see that we are documenting Antifa as an organization. That was very specific from the beginning of YDJ. We have 10k violent videos, 1,000 mugshots, 29,000 events with specific details and over 40,000 news articles archived. 500 Twitter accounts embedded and monitored, and much more.

DISTRICT COURT, COUNTY OF DENVER, COLORADO

Court Address:

1437 Bannock Street

Denver, Colorado 80202

▲ COURT USE ONLY ▲

Case # 20-CV-34319

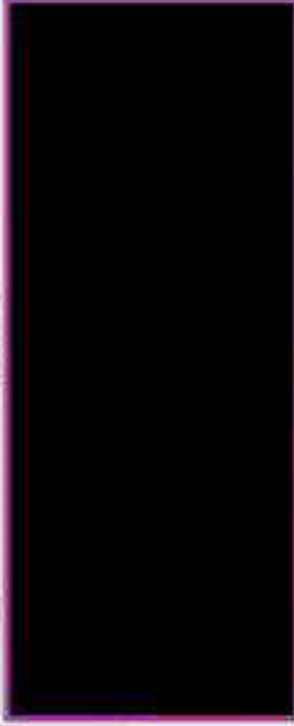
Div. 409

Plaintiff:

ERIC COOMER

Defendants:

DONALD J. TRUMP FOR PRESIDENT, INC., Et al



DECLARATION OF JOSEPH A. CAMP

I, Joseph A. Camp, being over the age of eighteen and of sound mind, hereby state and declare as follows: