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8 **Garrett Ziegler and ICU, LLC**

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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 ROBERT HUNTER BIDEN, an individual,  
13 Plaintiff,

14 vs.

15 GARRETT ZIEGLER, an individual; ICU, LLC, a  
16 Wyoming limited liability company d/b/a Marco  
17 Polo, and DOES 1 through 10, inclusive,  
18 Defendant(s)

Case No.: 23-cv-07593-HVD-KS

*Honorable Hernan D. Vera*  
*Magistrate Judge Karen L. Stevenson*

**GARRETT ZIEGLER'S DECLARATION  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PURSUANT TO  
RULES 12(b)(1), 12(b)(2), 12(b)(3), AND  
12(b)(6) OF THE FEDERAL RULES OF  
CIVIL PROCEDURE**

Date: February 15, 2024  
Time: 10:00am  
Dept.: 5B

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22 I, Garrett Ziegler, declare as follows:

23 1. I am a Defendant in this Action. I am also the founder and chairman of the board  
24 of directors of Defendant ICU, LLC. Unless otherwise stated, I have personal knowledge of the  
25 facts set forth herein that if called as a witness I could and would testify competently thereto.  
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1           2.       From February 2019 through January 2021, I worked in the White House. First, I  
2 worked as a Policy Analyst and, later, as an Associate Director in the Office of Trade and  
3 Manufacturing Policy. I worked under the supervision of Dr. Peter Navarro, an Assistant to the  
4 President. In this role, my duties involved researching and writing policy briefs for Dr. Navarro.

5           3.       After I left the White House, I continued researching policy issues and other matters  
6 of public importance, particularly corruption, and publicly reported on the findings of my research.

7           4.       On July 8, 2021, I organized ICU, LLC as a Wyoming limited liability company.  
8 ICU, LLC is a tax-exempt, non-profit 501(c)(3) doing business under the name *Marco Polo*  
9 (hereafter, ICU, LLC shall be referred to as "*Marco Polo*"). *Marco Polo* is a research group whose  
10 mission is to expose corruption and blackmail. Specifically, *Marco Polo* identifies, researches,  
11 analyzes, and reports on corruption in both the public and private sectors. A chief focus of *Marco*  
12 *Polo* is analyzing, researching, and publicly reporting on information obtained from a computer  
13 abandoned by Robert Hunter Biden, the son of President Joseph R. Biden Jr. From news articles  
14 that I read and programs that I watched, it was clear to me that the computer was the subject of  
15 intense media attention and scrutiny during the 2020 election. That scrutiny emerged after the *New*  
16 *York Post* published a story about the contents of the device on October 14, 2020. I observed that,  
17 after this article, Hunter Biden's laptop became referred to in the press as the "Biden Laptop" or  
18 sometimes as "the Laptop from Hell."

19           5.       I received a copy of the hard drive of the abandoned Biden Laptop in 2021 from an  
20 associate of former New York City mayor Rudy Giuliani. I accessed the information from the copy  
21 of the hard drive in Virginia. I have never seen or accessed Hunter Biden's original laptop (which,  
22 as discussed below, is in the custody of the Federal Bureau of Investigation).

23           6.       From September 2021 through October 2022, *Marco Polo* analyzed the voluminous  
24 material from the Biden Laptop. During the course of this analysis, *Marco Polo* began writing a  
25 comprehensive report about the material and, specifically, evidence of criminal activity.

26           7.       On October 19, 2022, *Marco Polo* published a 644-page report entitled *Report on*  
27 *the Biden Laptop* (hereafter, the *Report on the Biden Laptop* shall be referred to as the

1 "Report"). The *Report* is a comprehensive dossier detailing 459 verifiable violations of state and  
2 federal laws and regulations identified from information on the Biden Laptop; the *Report* contains  
3 2,020 footnotes.

4 8. *Marco Polo* published the report in a "reader view" available on its website<sup>1</sup>, made  
5 it available for the public to download from its website in a PDF format, and published it in  
6 paperback format available through its website.

7 9. *Marco Polo* also promoted the *Report on the Biden Laptop* widely on X, formerly  
8 known as Twitter, and other social media platforms. I have also been interviewed numerous times  
9 on shows and podcasts, and I have given numerous public speeches about the *Report*.

10 10. Indeed, our investigations and the *Report* have been cited over 300 times by  
11 mainstream publications. *Marco Polo's* research has been referenced by U.S. senators and  
12 congressmen and has been the basis for numerous questions at U.S. congressional hearings.

13 11. In addition to the *Report*, *Marco Polo* also created and published an online  
14 searchable database of 128,000 emails found on the Biden Laptop.

15 12. As a result of *Marco Polo's* research and voluminous publishing on corruption  
16 surrounding the Bidens and their associates, both *Marco Polo* and I have become widely known  
17 for our anti-corruption investigations and reporting. Indeed, more than six million unique IP  
18 addresses have reviewed the *Report* on the *Marco Polo* website.

19 13. I have hired no employees or independent contractors to conduct business in  
20 California, nor do any of *Marco Polo's* board members reside in California.

21 14. *Marco Polo* does not have an agent for service of process in California or any  
22 California license or incorporation.

23 15. *Marco Polo* does not charge users, nor has it ever received for-profit sales. It relies  
24 solely on donations from individuals.

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27 <sup>1</sup> The *Report* is available at [bidenreport.com](https://bidenreport.com)



1           24.     The metadata concerning the duplicated iPhone backup file on our external hard  
2 drive indicates that the last backup made of the iPhone file to the plaintiff's laptop, which he left  
3 at the repair shop of John Paul Mac Isaac on April 12, 2019, occurred on February 6, 2019, while  
4 still in the plaintiff's possession based upon all of the facts known to me to be provably true beyond  
5 dispute.

6           25.     Based on our analysis, we concluded the same as digital forensic investigators at  
7 Maryman & Associates and digital forensic expert Gus Dimitrelos—the duplicate of the plaintiff's  
8 laptop is authentic, the files have not been altered in any way, and the copied laptop files contain  
9 information which are matters of public interest worthy of our efforts to accurately report.

10           I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct. Executed December 21, 2023.

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Garrett Ziegler