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

ROBERT HUNTER BIDEN, an individual,

Plaintiff,

vs.

GARRETT ZIEGLER, an individual; ICU, LLC, a  
Wyoming limited liability company d/b/a Marco  
Polo, and DOES 1 through 10, inclusive,

Defendant(s)

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

*Honorable Hernan D. Vera*

*Magistrate Judge Karen L. Stevenson*

**GARRETT ZIEGLER'S DECLARATION  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR RECUSAL**

I, Garrett Michael Ziegler, declare as follows:

1. I am a Defendant in this action and the chairman of the board of directors of Defendant ICU, LLC dba Marco Polo ("Marco Polo"). Unless otherwise stated, I have personal knowledge of the facts set forth herein that if called as a witness I could and would testify competently thereto.

1           2.       I am the founder of Marco Polo. I previously served as an Associate Director of the  
2 Office of Trade & Manufacturing Policy in the White House under President Donald J. Trump  
3 from 2019-2021. I started Marco Polo after leaving my position with the White House at the end  
4 of the presidential term in 2021.

5           3.       Marco Polo's main webpage is [www.marcopolo501c3.org](http://www.marcopolo501c3.org). Marco Polo also  
6 operates and controls [www.BidenLaptopEmails.com](http://www.BidenLaptopEmails.com) and [www.BidenLaptopMedia.com](http://www.BidenLaptopMedia.com). Marco  
7 Polo is a 501(c)(3) nonprofit research group doing investigative reporting with a mission of  
8 exposing corruption and blackmail. As stated on our website, our mission is carried out by  
9 "applying the skills, resources, & methods of private investigative work to opposition research—  
10 not for the benefit of any particular party or faction, but for the American People as a whole. MP's  
11 mission is inspired by the belief that corruption & blackmail are a corrosive gangrene for any  
12 government & polity, but especially for a constitutional republic such as the one the American  
13 founders bequeathed to us. Our charity's work is defined by an adherence to sobriety & truth above  
14 all else, no matter who the truth implicates or exonerates."

15           4.       Marco Polo spent its first eighteen months writing the Report on the Biden Laptop,  
16 a 644-page report (the "Biden Laptop Report") regarding the contents of files that originated from  
17 a laptop (the "Biden Laptop") once owned by Plaintiff Hunter Biden, the son of President Joesph  
18 Biden. I am the primary author of the Report and participated and oversaw in the extensive  
19 investigation and reporting. The Biden Laptop Report is available to the public at  
20 [www.marcopolo501c3.org](http://www.marcopolo501c3.org). As has been widely reported and is common knowledge in the public  
21 realm, the Biden Laptop was abandoned by Plaintiff after leaving it with a computer repairman.  
22 Thereafter, the copies of the files were delivered to me through an intermediary.

23           5.       Collectively, our webpages contain volumes of information pertaining to the Biden  
24 Laptop in addition to data and information that implicates the vulnerability of President Biden to  
25 an ongoing congressional impeachment inquiry that was formally approved by the House of  
26 Representatives on December 13, 2023. The congressional impeachment inquiry is focused on  
27 whether President Biden was involved with Plaintiff's overseas business activities with clients in  
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1 China, Ukraine, and Romania, among other foreign countries. Republicans in Congress are  
2 investigating whether those business dealings involved corruption and influence peddling by  
3 President Biden. A true and correct copy of the United States House of Representatives Resolution  
4 is attached as **Exhibit 10** to the Request for Judicial Notice in Support of the Motion to Recuse  
5 (“RJN Motion to Recuse”).

6 6. Plaintiff filed this lawsuit three years after the dissemination of the files emanating  
7 from the Biden Laptop. Plaintiff filed this lawsuit one day after the former House Speaker Kevin  
8 McCarthy announced that he directed House committees to open an impeachment inquiry into  
9 President Joe Biden on September 12, 2023. This was the initial step that led to the formal vote by  
10 the House of Representatives on December 13, 2023. The impeachment inquiry into Plaintiff's  
11 father was announced during the middle of Plaintiff's father's re-election campaign for the U.S.  
12 presidency.

13 7. Plaintiff's lawsuit is primarily based on Defendants' Report on the Biden Laptop  
14 that Marco Polo published regarding Plaintiff and President Biden as part of Marco Polo's mission  
15 of exposing corruption within the government and private sector. In preparing the Biden Laptop  
16 Report, I relied on copies of files from the Biden Laptop that had already been widely circulated  
17 since at least October 2020 to numerous media outlets who, based on my knowledge, reported on  
18 the same content from the Biden Laptop that I was investigating and reporting on. A true and  
19 correct copy of a few relevant excerpts (given the subject of this Declaration and Motion) of the  
20 Biden Laptop Report is attached as **Exhibit 1** to the Request for Judicial Notice in Support of the  
21 Motion to Recuse (“RJN Motion to Recuse”).

22 8. Marco Polo has become the preeminent source in the nation for access to the  
23 contents of the abandoned Biden Laptop. I monitor and receive reports that identify the traffic of  
24 visitors to our webpages. Millions of Americans—including those conducting the impeachment  
25 inquiry into Plaintiff's father—would be affected if this Court granted Plaintiff's egregious request  
26 to have our webpages shut down. The following statistics explain the scale of public interest in our  
27 work:

- BidenLaptopEmails.com provides a searchable database of emails from the Biden Laptop and that webpage has been accessed by more than 4 million Americans since its inception in May of 2022.
- BidenLaptopMedia.com provides a searchable database of media on the Biden Laptop and that webpage has been accessed by more than 5 million Americans since its inception in June of 2023.
- More than 8 million Americans have accessed the free digital version of the Biden Laptop Report, which was made available in November 2022 at MarcoPolo501c3.org, with millions more reading posts about the contents of the Biden Laptop Report on social media.

9. Additionally, there have been at least 441 citations to Marco Polo's websites by other media outlets as a source of reliable information. A true and correct copy of a web page entitled "In the News" from [www.MarcoPolo501c3.org](http://www.MarcoPolo501c3.org) referencing the citations to Marco Polo's work surrounding the Biden Laptop Report and other materials pertaining to the Plaintiff is attached to the RJN Motion to Recuse as Exhibit 2.

10. Marco Polo met with and provided background research and the Biden Laptop Report to staff and congressional members on the Oversight, Judiciary, and Ways and Means Committees in the U.S. House of Representatives. On January 10, 2024, Defendants work product published on Marco Polo's websites (which Plaintiff requests this Court to shut down) and Marco Polo itself were expressly named and referenced as a source of evidence at a congressional hearing of the House Oversight & Accountability Committee related to Plaintiff's refusal to attend a congressional deposition pertaining to his father's impeachment inquiry. A true and correct copy of a video from C-SPAN regarding the congressional hearing is available at <https://www.c-span.org/video/?532775-2/oversight-committee-debates-resolution-hold-hunter-biden-contempt-congress-part-2> ([Oversight Committee Debates Resolution to Hold Hunter Biden in Contempt of Congress, Part 2 | C-SPAN.org](https://www.c-span.org/video/?532775-2/oversight-committee-debates-resolution-hold-hunter-biden-contempt-congress-part-2)) and is attached to the RJN Motion to Recuse as **Exhibit 11**. At this time, the official transcripts of the hearing are not yet available. Shortly after minute 21:00,

1 Congresswoman Margarie Taylor Greene presented demonstrative exhibits of evidence that she  
2 and her staff received directly from Defendants. (See minutes 21:00-24:27.) The exhibits are  
3 copies taken directly from pages of the Biden Laptop Report. Congressman Jamie Raskin then  
4 requested that Democrats on the committee be provided the Biden Laptop files. (See minutes  
5 23:17–24:03.) Congresswoman Anna Paulina Luna then interjects that she can provide every  
6 Democrat member a copy of the Biden Laptop because “Marco Polo has the actual entire  
7 publication.” Chairman James Comer then commented to Congressman Raskin, “you mentioned  
8 you wanted to read some stuff, that would probably be something good to read, the Marco Polo  
9 Report.... It’s public record.” (See minutes 23:58-24:27.)

10 11. After filing Defendants’ Motion to Dismiss, Defendants discovered information  
11 that would cause a reasonable person to question whether Judge Hernan Vera could be impartial  
12 in rendering a decision on the relief requested by Plaintiff because Judge Vera’s previous donations  
13 to President Biden’s campaign reveal an obvious bias toward President Biden and the success of  
14 his presidency. After providing the information to Defense counsel and evaluating the legal merits  
15 of bringing this Motion to Recuse, I instructed my attorneys to prepare and file the motion as soon  
16 as reasonably practicable in order to avoid Judge Vera making any initial rulings in this case.

17 12. To the best of my knowledge, there is no other publicly accessible website that  
18 contains the breadth of information found on the Biden Laptop, including its searchable database,  
19 as does the websites operated by Marco Polo.

20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct. Executed March 7, 2024.

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Garrett Ziegler