## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No. 21-cv-03440-WJM-KAS	
ERIC COOMER, Ph.D.,	

Plaintiff

v.

MAKE YOUR LIFE EPIC LLC dba THRIVETIME SHOW, REOPEN AMERICA LLC dba REAWAKEN AMERICA TOUR, and CLAYTON THOMAS CLARK, individually,

**Defendants** 

## **EXHIBIT 10**

1	IN THE UNITED STATES DISTRICT COURT			
Т	FOR THE DISTRICT OF COLORADO			
2				
3 4				
4	ERIC COOMER, Ph.D.,			
5				
_	Plaintiff,			
6	vs.			
7	Civil Action No.			
	MAKE YOUR LIFE EPIC LLC d/b/a 21-cv-03440-WJM-KAS			
8	THRIVETIME SHOW, REOPEN			
9	AMERICA LLC d/b/a REAWAKEN  AMERICA TOUR, and CLAYTON			
-	THOMAS CLARK, individually,			
10				
11	Defendants.			
12				
13				
14	VIDEO RECORDED DEPOSITION OF MICHAEL T. FLYNN			
	(Conducted Via Videoconference)			
15				
16	DATE: April 4, 2024			
17	APITI 1, 2021			
	TIME: 10:03 a.m. to 3:21 p.m.			
18	DIDCHANT TO: Notice by soungel for			
19	PURSUANT TO: Notice by counsel for Plaintiff for purposes of			
	discovery, use at trial			
20	or such other purposes			
21	as are permitted under the Florida Rules			
	of Civil Procedure			
22				
23	BEFORE: Nathan F. Perkins, RDR Notary Public, State of			
ر ہے	Florida at Large			
24				
25	Pages 1 to 186			
	Page 1			
	1 450 1			

1       APPEARANCES:       1         2       BRAD KLOEWER, ESQUIRE       2         CHARLES J. CAIN, ESQUIRE       2         3       Cain & Skarnulis PLLC       3         P.O. Box 1064       4         Salida, Colorado 81201       4	THE VIDEOGRAPHER: Good morning. We are going on the record at 10:03 a.m. on April 4th, 2024.
CHARLES J. CAIN, ESQUIRE  Cain & Skarnulis PLLC P.O. Box 1064	
3 Cain & Skarnulis PLLC P.O. Box 1064	I , , , , ,
P.O. Box 1064	This is Media Unit 1 of the recorded deposition of
4 Salida Colorado 81201	Michael T. Flynn taken by counsel for plaintiff in
and 5	the matter of Eric Coomer, Ph.D., versus Make Your
5 303 Colorado Street, Suite 2850 6	Life Epic, Thrivetime, et al., filed in the United
Austin, Texas 78701	•
attorney for Familia	States District Court for the District of Colorado.
Gordon Rees Scully Mansukhani LLP	Civil action number 21-CV-03440-WJM-KAS.
8 555 Seventeenth Street	The locations of this deposition being
Denver, Colorado 80202 10 9 Attorney for Defendants 11	conducted remotely using virtual technology.
10 JASON GREAVES, ESQUIRE	My name is Dawn Matthes representing Veritext
JARED ROBERTS, ESQUIRE 12	Legal Solutions and I'm the legal videographer.
11 Binnal Law Group 717 King Street, Suite 200	And the court reporter today is Nathan Perkins from
12 Alexandria, Virginia 22314	the firm Veritext Legal Solutions.
Attorneys for the witness, Michael T. Flynn 15	Counsel and all present now will state their
VIDEOGRAPHER: DAWN MATTHES 16	appearance and affiliation for the record going
14 VIDEOGRAPHER: DAWN MATTHES	with the noticing attorney.
15	MR. KLOEWER: Good morning. This is Brad
16   17	Kloewer, here on behalf of the plaintiff, Dr. Eric
18 20	Coomer.
19 21	MR. GREAVES: Jason Greaves, on behalf of the
20 22	deponent Michael T. Flynn.
22 23	MR. ROBERTS: Jared Roberts, on behalf of the
23	deponent, Michael T. Flynn.
24 25 25	MS. WIESE: Melissa Wiese, on behalf of the
Page 2	Page 4
1 INDEX	
2 DIRECT EXAMINATION BY MR. KLOEWER Page 5	defendant Make your Life Epic, Clay Clark, and
3 CERTIFICATE OF OATH Page 183 2	ReOpen America.
4 REPORTER'S CERTIFICATE Page 184 5 WITNESS' SIGNATURE PAGE Page 185	THE VIDEOGRAPHER: Will the court reporter
6	please swear in the witness, and then counsel may
7 EXHIBITS 8 Plaintiff's Description Page 5	proceed.
9 Exhibit 13 Reopen America LLC Profit and Loss 37 6	MICHAEL T. FLYNN,
for 2021 10 Exhibit 15 Reopen America LLC profit and loss 36	the witness herein, being first duly sworn on oath, was
10 Exhibit 15 Reopen America LLC profit and loss 36 document 8	examined and deposed as follows:
11 Exhibit 17 Reopen America LLC Profit and Loss 40 9	DIRECT EXAMINATION
for 2023 12 Exhibit 19 Composite video 13	BY MR. KLOEWER:
Exhibit 21 E-mail chain ending 11/14/2020 from 86	Q. All right. We will get started. Good
13 Mike Flynn to Joshua Steinman, et al. 12	morning, Mr. Flynn. My name is Brad Kloewer. I'm an
14 Exhibit 22 E-mail 12/1/2020 from Ben Sheva to 96 13	attorney. I represent Dr. Eric Coomer. He's the
Mike Flynn, et al.	plaintiff in this proceeding.
15 Exhibit 23 E-mail string ending 12/12/2020 99 from Sidney Powell to Regis Giles, 15	Just real quickly, to clarify for the record,
16 et al.	I'm joined by Charlie Cain, my co-counsel in this case,
Exhibit 24 E-mail chain ending 12/11/2020 from 114  17 Jim Penrose to Sidney Powell, et 17	and Dr. Eric Coomer is also on the ZOOM this morning.
al	
18 Exhibit 25 Document 12/16/2020 headed 126	Before we get started, I want to establish a
Presidential Findings 19 Exhibit 26 E-mail chain ending 12/21/2020 from 129	couple ground rules. It may be helpful to understand
Sidney Powell to flynn 20	first, Mr. Flynn, have you ever had your deposition
20 resilientpatriot.com, et al. 21 Exhibit 27 Deposition notice 155	taken before?
21 Exhibit 27 Deposition notice 133	It appears the screen has frozen up. Is that
22 23	on my end or is it Mr. Flynn?
23 24	THE VIDEOGRAPHER: He has come back on. Hold
25	on. It looks like he dropped.
Page 3	Page 5

1	THE WITNESS: That was a quick deposition.	1	question on the table.
2	MR. KLOEWER: All right. Well, we've got a	2	Is that fair?
3	bit more to get through, so we will continue here.	3	A. Understood.
4	MR. GREAVES: It might be helpful, I think, if	4	Q. All right. Mr. Flynn, can you tell me where
5	attorneys that aren't asking questions go off	5	you are right now? I don't need a physical address but
6	video, just to save the bandwidth here.	6	it appears that you are in a residence; is that correct?
7	THE WITNESS: Good idea.	7	A. No. I'm in my office in Venice, Florida.
8	BY MR. KLOEWER:	8	Q. Venice, Florida. Okay. And is anyone in the
9	Q. Okay, Mr. Flynn. Can you state your full name	9	room with you this morning?
10	for the record?	10	A. No, there is not. No one is in the room.
11	A. Michael Thomas Flynn.	11	Q. Okay. I ask that I just when we take a
12	Q. And before we get started, I want to just	12	remote deposition, it's important that when I ask you a
13	establish some basic ground rules. It may be helpful to	13	question, I'm getting an answer based on your personal
14	understand, have you ever had your deposition taken	14	knowledge and that not from any other source. So if it
15	before, Mr. Flynn?	15	appears that you are somebody is speaking to you
16	A. Yes.	16	outside of the frame or you are looking at your phone or
17	Q. In what cases?	17	something like that, I'm going to raise that issue. But
18	A. I don't recall the cases. I mean, you know,	18	I don't anticipate that we'll have in any problems with
19	the I have had depositions taken in	19	that.
20	(ZOOM connection became unstable with an	20	Okay. I want to get started here. We'll jump
21	interruption by the court reporter.)	21	right in.
22	(A discussion off the record)	22	As you know, this lawsuit has been filed
23	THE VIDEOGRAPHER: Shall we go off the record	23	against Clay Clark, Make Your Life Epic, doing business
24	and figure this out?	24	as the Thrivetime Show, and the entity Reopen America
25	MR. KLOEWER: Yeah. Let's	25	LLC has recently been added to the case.
	Page 6		Page 8
1	MR. GREAVES: He's back for me.	1	Can you tell me, Mr. Flynn, when did you first
2	MR. KLOEWER: Okay.	2	meet Mr. Clark?
3	THE VIDEOGRAPHER: Keep rolling.	3	A. It was late winter 2021.
4	BY MR. KLOEWER:	4	Q. Okay. What was the context of that meeting?
5	Q. Yeah. All right. Mr. Flynn, you	5	A. I was in Tulsa, Oklahoma, endorsing a
6	A. In various, various cases, Brad. I mean, I've	6	political candidate. And I believe it was at Clay's
7	had various depositions taken in various cases. I mean,	7	business offices when we first met.
8	you know, one up in Georgia. I've had, if I recall, one	8	Q. Okay. And just to clarify, I believe you just
9	up in Washington, DC. I don't recall the cases or dates	9	said late winter of 2021.
10	or anything like that.	10	A. Yeah. Yep.
11	Q. Well, I ask just so that we understand the	11	Q. Is it is it possible you met him in late
12	basic mechanics of a deposition. Just a few sort of	12	2020?
13	rules at the outset. I ask that you not speak over me,	13	A. 2020? No.
14	and I'll do my best not to speak over you as well. And	14	Q. Okay. I ask that because we are going to be
15	that's because Nathan Nate is taking down every word		looking at some video clips of tour appearances that
16	you say on the transcript, so it's important that we	16	happened throughout the summer of 2021, so I just want
17	have a clean record here. So even if you anticipate a	17	to be sure if your recollection is correct on that
18	question I'm asking, I ask that you not jump to answer	18	matter.
19	that question until I have concluded. And if I ask a	19	A. You just said 2020. You just said late winter
20	question in a way that doesn't make sense or is unclear,	20	2020. I said late winter 2021.
21	just let me know. I'm happy to rephrase it, just so	21	Q. I'm aware of that. I just the ReAwaken
22	that we're all on the same page.	22	America Tour began its appearances in spring and summer
23	The other thing. Breaks are okay. If you	23	of 2021. So that's
24	need a break at any time, please let me know. The one	24	A. That's right. 2021. 2021. You're right.
25	thing I ask is that we don't take a break with a	25	Q. Okay. And you said you met him in the context
	Page 7		Page 9

1 2	of a political candidate that you were endorsing?  A. Yes.	1 2	the next time that you spoke with Mr. Clark after that event?
3	Q. Who was that candidate?	3	A. I mean, I would be guessing. I don't I
4	A. Jackson Lahmeyer.	4	don't recall the exact time.
5	Q. And how do you know Mr. Lahmeyer? Did you	5	Q. Was it at that event that you discussed the
6	know him beforehand?	6	possibility of starting the ReAwaken America Tour?
7	A. I did not.	7	A. I don't know if it was at an event or or in
8	Q. Why did you make the decision to endorse him?	8	a subsequent conversation, but I know that I know we
9	A. I liked him. And some friend had come to me	9	eventually talked holding a, you know, an event in
10	and asked me if I would consider endorsing him.	10	Tulsa.
11	Q. Was it based just on a personal affinity that	11	Q. Was that your idea?
12	you decided to extend that endorsement.	12	A. I don't recall. I don't recall.
13	A. No. I did I did some background and, you	13	Q. So you don't recall reaching out to Mr. Clark,
14	know, like I normally do when I do political	14	for example, to propose starting up the ReAwaken America
15	endorsements for people. So it was a I thought he	15	Tour or something similar?
16	was a good you know, the right right person.	16	A. No, no. No, I don't. I really don't. We may
17	Q. And this event was being held by Clay Clark?	17	have talked about it when we were together. I don't
18	Do I understand that correctly?	18	recall, no.
19	A. Yeah. I believe it was. It was at at his	19	Q. Okay. I guess we'll just hop right in here
20	office complex the first time. Yeah. If I remember	20	with some of the audio visual stuff and see if this
21	right.	21	might refresh your recollection.
22	Q. And so you traveled there to his office	22	We'll designate the audio visual exhibits for
23	complex in Tulsa for purposes of that endorsement?	23	this proceeding as Exhibit 19. And I'm going to play
24	A. Yes.	24	just an audio clip, which we will designate as clip 1.
25	Q. And had you met had you spoken to him	25	This is we're utilizing a new discovery provider
23	Page 10	23	Page 12
1	before traveling to this event? Did you speak on the	1	here, Veritext, so bear with me. I'm going to try to
2	phone or communicate by other means prior to traveling	2	hopefully there's no issue getting this exhibit in here.
3	down there?	3	(Exhibit 19, Composite video, was marked for
4	A. I don't recall if we ever spoke prior, no. I	4	identification.)
5	don't recall if I did.	5	(A video clip was played as follows:)
6	Q. Did you know who Mr. Clark was before this	6	AN INDIVIDUAL: So, Steve, we called
7	event?	7	General
8	A. I don't believe I did.	8	(The playing of the video clip stopped.)
9	Q. Had you ever listen to his podcast, the	9	BY MR. KLOEWER:
10	Thrivetime Show?	10	Q. Okay. I'm going to play this for one moment
11	A. I don't believe I did. I don't believe I had	11	and confirm if you can hear it, and then I'm going to
12	by that time. I mean, I listen to a lot of things, so,	12	restart the audio recording so that we all have a clear
13	you know, I'm not going to sit here and tell you that I	13	record here.
14	didn't hear it, but I don't recall that being one of the	14	(A video clip was played as follows:)
15	ones that I would watch or listen to.	15	MR. CLARK: I said, General Flynn, I think God
16	Q. Had you read any of his, books?	16	wants us to do a ReOpen America Tour where we kill
17	A. Prior?	17	the spirit
18	O. Correct.	18	(The playing of the video clip stopped.)
19	A. I had not.	19	BY MR. KLOEWER:
20	Q. So did you know anything about his background	20	Q. Can you hear that okay, Mr. Flynn?
21	at all before that first meeting?	21	A. I can.
22	A. I don't believe I did.	22	Q. Okay. I'm going to restart the recording.
23	Q. Okay. So you traveled to Tulsa to endorse	23	And I'll represent this is from an interview that Mr.
24	Mr. Lahmeyer. How did your relationship with Mr. Clark	24	Clark conducted with Stephen Strang on December 2nd of
25	develop from that point? And let me clarify. When was	25	2021?
	Page 11		Page 13

1	(A video clip was played as follows:)	1	content would be presented?
2	MR. CLARK: So, Steve, we called General	2	A. I don't believe we had any specific talks like
3	Flynn. I said, General Flynn, I think God wants us	3	that. I think it was just, you know, get the you
4	to do a ReOpen America Tour where we kill the	4	know, get a good group of people, get a good group of
5	spirit of fear, where we explain the truth that the	5	speakers, and make sure that, you know. And, of course
6	models are false that 2.2 million Americans have	6	you know, the place, it turned out to be a much larger
7	died from COVID, that PCR tests are false, COVID-19	7	event that I think anybody anticipated. But no, nothing
8	is 100 percent treatable using budesonide,	8	any nothing specific about those issues that you're
9	ivermectin, hydroxychloroquine. We've exposed	9	talking about.
10	election fraud, medical fraud, religious fraud,	10	Q. And who was in charge of planning that, that
11	monetary fraud, media fraud. And it's all about	11	first event?
12	getting people back to God. And General Flynn	12	A. Clay.
13	said, I know, but it has to happen through the	13	Q. And what role did you have in that event?
14	church.	14	A. I don't recall having a very big role at all
15	(The playing of the video clip stopped.)	15	other than just making sure that I was just going to be
16	BY MR. KLOEWER:	16	there and attend.
17	Q. Okay. Does that refresh your recollection,	17	Q. Did you provide any input as to which speakers
18	Mr. Flynn? Do you remember having that conversation	18	to include in that first event?
19	with Mr. Clark?	19	A. I don't believe I did, no. I don't believe I
20	A. On that show, or what do you be specific.	20	did. I think later on maybe, but not that I think
21	I mean we had	21	that one was just get the speakers that we could get.
22	Q. Just the means by which he described the	22	Q. Did you provide any input as to what topics
23	origins of the Tour, that he called you and proposed it,	23	the Tour would cover or the event would cover?
24	and that and that you agreed but suggested that it	24	A. No. I think that the title covered it, you
25	should happen, as he stated, quote, through the church.	25	know, Health and Freedom.
	Page 14		Page 16
1	A. Yeah. I mean, I know we had conversations	1	Q. Well, what does that mean to you? What topics
2	about that. I don't recall, you know, that specific set	2	did you understand the event would cover? Under the
3	of statements that he made, but I don't disagree with	3	health topic, what did you think the event would
4	anything that he said.	4	address?
5	Q. All right. And do you recall when the first	5	A. Well, I know that that first event we had
6	ReAwaken Tour event was?	6	some some doctors who spoke about the COVID-19 and
7	A. It might have been like April, maybe April	7	all the issues surrounding COVID-19. And we had some
8	2021. I don't exactly know. And it wasn't really the	8	we definitely had some pastors spoke. You know, we
9	first one or two, maybe; maybe even first three. They	9	had we had some legal scholars speak. Maybe just had
10	were called, I think, Health and Freedom. Health and	10	a variety of people.
11	Freedom Tour I think is what we called them.	11	Q. What about the freedom aspect of the event?
12	Q. That's right. Those were held in Tulsa,	12	What topics would you say fall under that umbrella?
13	Oklahoma; is that correct?	13	A. I think anything ranging from, you know,
14	A. The first one, yes.	14	protection of our Bill of Rights, Constitution. Just
15	Q. Okay. What sort of discussions did you have	15	general topics. The security of the nation. I mean,
16	with Mr. Clark leading up to that, that event? And by	16	you know, just topics like that. And I think that those
17	that I mean did you discuss what you wanted the event to	17	were those were probably the umbrella, you know, from
18	look like?	18	that side from the folks that spoke to those issues.
19	A. No, I don't think so. I think it was just,	19	But a lot of veterans that attended, that I remember
20	you know, get as many people to attend as possible and	20	meeting a lot of veterans.
21	get the word out on what we felt was going on at the	21	Q. Was one of the purposes of that first event to
22	time.	22	address concerns surrounding the 2020 election results?
23	Q. Did you agree with Mr. Clark on the format of	23	A. I I don't recall exactly what we what
24	having a variety of speakers on different topics, or did	24	was talked about during that particular event, no. I
25	you did you have discussions as to how the Tour	25	
	Page 15	23	mean, it could have been.  Page 17

1	Q. But you would agree that the Tour does feature	1	counselor sometimes, I think, with Clay. He and I will
2	a variety of topics and speakers that address election	2	talk about different people that, you know, it has
3	integrity and security matters, correct?	3	evolved toward that, because sometimes sometimes w
4	A. I would say yeah, that's a good that's a	4	get people that we vet and, you know, they they'll
5	good characterization.	5	talk, they'll speak, and then we won't we won't want
6	Q. And is it your understanding that's one of the	6	them back because of some of the things that they'll
7	purposes of the Tour, is to present that sort of	7	speak about or we see things that they do in between an
8	information?	8	event. But I think from the beginning it was always
9	MS. WIESE: Object to the form.	9	just about people who who sort of fit the kinds of
10	THE WITNESS: I'm sorry?	10	topics that we wanted to talk about. And we brought
11	BY MR. KLOEWER:	11	on we brought on a lot ended up bringing on a lot
12	Q. That was Ms. Wiese. She's counsel for	12	of people who I think talk about an array of topics like
13	Mr. Clark.	13	I just like I previously mentioned here.
14	I should have clarified at the beginning, and	14	Q. All right. Well, let's break that down a
15	you may recall this from prior depositions, at different	15	little bit. You mentioned a few things there I want to
16	times you may hear objections from counsel. You can	16	follow up on. You said you talked to Clay about people
7	still answer the question. So Ms. Wiese was objecting	17	and you will vet them. What does the vetting process
8	to the form of my question there. I'll reask it just so	18	look like for potential speakers?
9	that so that we're clear.	19	A. Listening to a podcast that they're on or
20	I believe my question was you would agree that	20	talking to them, meeting them. That's all. People will
21	the Tour was intended to address concerns about the	21	come to us and go, Hey, can we we would like to spe
22	election, correct?	22	at your next ReAwaken Tour. You know, they may be
23	MS. WIESE: Same objection.	23	political person, it might be an attorney, it might be a
.5	THE WITNESS: Yeah. I don't think that's	24	pastor. I mean, and sometimes it's just a matter of
25	the no, I don't think that's the case. No, I	25	meeting them. You know, they will show up to an even
23	Page 18	23	Page 20
1	don't. Because you are making it you're	1	and we'll meet them and they will say, Hey, can we com
2	saying you're stating that the tour's purpose is	2	on and join you on the next one? And, you know, and
3	that, and I don't think that's the tour's purposes.	3	there will be a decision made, we will talk to them.
4	BY MR. KLOEWER:	4	You know, Clay generally takes a look at them too.
5	Q. Is it one of the tour's purposes?	5	That's probably about it.
6	A. It's one of the elements that's discussed	6	Q. What about the substance of what those
7	during the Tour, yeah, among many. I mean, we talk	7	speakers present? Do you do you have them do like a
8			speakers present? Do you uo you nave them uo nke a
J	about child autism, we talk about education, you know.	8	
	about child autism, we talk about education, you know. So we talk about a lot of issues and topics. That's one		test presentation or something of that nature to see
9	So we talk about a lot of issues and topics. That's one	9	test presentation or something of that nature to see what it is exactly they want to say on stage?
9	So we talk about a lot of issues and topics. That's one among many.	9 10	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.
9 10 11	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.	9 10 11	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?
9 10 11	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.  Clark prior to hosting this event?	9 10 11 12	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?  A. I don't know. You'd have to ask him.
9 10 11 12	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.  Clark prior to hosting this event?  A. No, I don't believe we did. I mean, I don't	9 10 11 12 13	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?  A. I don't know. You'd have to ask him.  Q. Is there anyone else who is involved in that,
9 0 1 2 3	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.  Clark prior to hosting this event?  A. No, I don't believe we did. I mean, I don't believe we had any specific "we're going to talk about	9 10 11 12 13 14	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?  A. I don't know. You'd have to ask him.  Q. Is there anyone else who is involved in that, that vetting process you described other than you and
9 10 11 12 13 14	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.  Clark prior to hosting this event?  A. No, I don't believe we did. I mean, I don't believe we had any specific "we're going to talk about these things." No, no. I think we just it just	9 10 11 12 13 14 15	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?  A. I don't know. You'd have to ask him.  Q. Is there anyone else who is involved in that, that vetting process you described other than you and Mr. Clark?
9 10 11 12 13 14 15	So we talk about a lot of issues and topics. That's one among many.  Q. And did you discuss all these topics with Mr.  Clark prior to hosting this event?  A. No, I don't believe we did. I mean, I don't believe we had any specific "we're going to talk about these things." No, no. I think we just it just evolved and we brought in a different array of speakers.	9 10 11 12 13 14 15 16	test presentation or something of that nature to see what it is exactly they want to say on stage?  A. I don't.  Q. Do you know if Mr. Clark does?  A. I don't know. You'd have to ask him.  Q. Is there anyone else who is involved in that, that vetting process you described other than you and Mr. Clark?  A. I I don't know. I don't know if there is.
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1	many cases they're very high profile people, you know,	1	Q. And as for you, do you take make any
2	highly respected lawyers, highly respected pastors,	2	efforts to sort of keep an eye on tour speakers when
3	highly respected doctors, highly respected political	3	they are not on stage or monitor their conduct?
4	activists, highly respected, you know, government	4	A. I don't.
5	officials, I mean. So	5	Q. This individual that you mentioned who was
6	Q. You mentioned before that there you've	6	removed for the anti-Semitic comments, was that the only
7	talked to him about people that maybe were on the Tour	7	instance when somebody has been removed from the Tour?
8	and they were removed from the Tour. Did I understand	8	A. I don't think that's the only instance, but
9	you correctly when you said that?	9	that's the one that I recall. One that I recall.
10	A. Yeah. There's a couple of examples.	10	Q. Have there ever been times when somebody
11	Q. Okay. Who would those individuals be?	11	wanted to present on stage and was denied that, that
12	A. Oh, there's people that like I I don't	12	request?
13	know if I remember the guy's name, but there was an	13	A. You know, I don't recall. I mean, if there
14	individual who made some pretty serious anti-Semitic	14	are, it would be I think it would be more of a time
15	remarks, and so he was asked to, very professionally and	15	factor and we just didn't have the time, there was just
16	very politely, that we would not be inviting him back.	16	not enough time for somebody to present, because there
17	Q. And whose decision was that to remove him from	n 17	are so many people that want to that have wanted to
18	the Tour? Was that your decision?	18	join to speak, because it's a great platform and it's a
19	A. No. It's Clay's decision. I mean, he you	19	great event.
20	know, we would talk about it, because it's you know,	20	Q. Is there a sort of test to determine who is
21	these people get upset and they have you know. And	21	who is qualified to speak. And I'm asking that in a
22	we want to be very professional and very polite in how	22	couple different ways. Number 1, in terms of sort of
23	we deal with everybody. And I think that that kind	23	ideology or background. Is there are there, for
24	of stuff was handled, was handled I think appropriately.	24	example, people that would not be welcome to speak on
25	I think Clay did a masterful job of, you know, letting	25	the ReAwaken America Tour?
	Page 22		Page 24
1	that person know.	1	A. I don't believe I don't believe that's the
1 2	that person know.  Q. And were those comments that were made on	1 2	A. I don't believe I don't believe that's the case at all. We've we've opened the door up to
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1	hearing in hearing what they have to say. That's for	1	there.
2	sure. So I mean, I again, we're pretty open, but I	2	Q. And you are aware the Tour has been referred
3	would say that that I don't have any idea whether or	3	to as Mike Flynn's ReAwaken America Tour? Have you seen
4	not we have ever had anybody ever ask us that.	4	that before?
5	Q. Well, what I am getting at is that the Tour	5	A. I have not. No, I don't recall that. And, I
6	presents a variety on a variety of topics from a	6	mean, if people if people refer to that, to me as
7	specific point of view. Would you agree?	7	that, that's very humbling. That's very nice. But I
8	A. No, Brad, I wouldn't agree. It what you	8	know that I am one of the headliners for it, and I have
9	are asking is what the media presents the Tour to be.	9	been to every single one of them, which is a real badge
10	That's what you're asking me. That's what you're	10	of honor, to be honest with you, that I have been able
11	that's what you're implying. So no, the Tour is wide	11	to make it to every one.
12	open. We have people of all races, colors, creeds. We	12	Q. Well, that was my next question. So it seems
13	have a lot of people that come on this thing. It's a	13	like the Tour events don't happen without you. Is that
14	it's a wonderful, wonderful event. We have thousands of	14	fair?
15	people that attend. I think the smallest audience we	15	A. We do coordinate schedules. We definitely
16	have ever had is three or three or four thousand	16	coordinate schedules, you know. Yes, we do coordinate
17	people, I mean. So no, I disagree.	17	schedules.
18	Q. When the Tour began it was it sounds like	18	Q. And when you are at these events, do you do
19	the Tour has expanded to cover more subject matter over	19	you go and watch the speakers yourself?
20	time. We don't need to go into everything that the Tour	20	A. I try to. I try to watch every single one.
21	covers or that speakers cover. I just want to	21	But I, you know, just based on other things that I am
22	understand what sort of discussions happened around	22	involved in. Sometimes I'm out in the audience. But
23	bringing on new speakers or addressing new topics. Do	23	yeah, I try to I try to pay attention to as much of
24	you have conversations with Mr. Clark about what you	24	the speakers as possible, because I like their message.
25	would like the Tour to address, or has he raised those	25	I learn a lot.
	Page 26		Page 28
1	issues with you? How does that how does the sort of	1	Q. Let's talk a little bit about the entities
2	subject matter of the Tour how is that established?	2	that run the Tour. Can you tell me who is who do you
3	A. Yeah. I mean, we talk about that. We've	3	understand is the entity that is in charge of running
4	brought on comedians, we've brought on wonderful	4	the Tour?
5	professional singers, we've brought on I mean, moms	5	A. Define "entity."
6	who have stood on the stage and talked about how they	6	Q. Well, we've we've identified a couple in
7	are getting involved in their school boards. We have	7	this proceeding as Make Your Life Epic, which goes under
8	had you know, we have a wonderful young lady who	8	the business name of Thrivetime Show. Does the
9	comes on and talks about child autism, which is	9	Thrivetime Show, are they the ones that are putting
10	fascinating. We have God, we have all kinds of	10	this the Tour on, as you understand it?
11	topics. I mean, it's a wonderful event. You know, you	11	A. I don't know.
12	are more than welcome to join us up in Michigan in June.	12	MS. WIESE: Objection, foundation.
13	Q. And what is your role at these events? You	13	THE WITNESS: Yeah. I mean yeah. I mean,
14	are prominently featured on the advertisements,	14	I don't know. Honestly, I really don't know. I
15	obviously. Would you agree with the description that	15	mean, I know Thrivetime Show is the podcast that
16	you are sort of the headliner of these events?	16	that I do with Clay. But I don't really know.
17	A. I'm one of them, yes.	17	BY MR. KLOEWER:
18	Q. Who else would you consider to be a headliner?	18	Q. What about Reopen America, LLC? Do you know
19	A. Mike Lindell. There have been so many over	19	what their role is?
20	time. Roger Stone. Some of the doctors we have had.	20	A. I don't.
21	Malone I think we've had. McCullough we've had. Simone	21	Q. Does the Tour have employees?
22	Gold we've had. Stella Immanuel. Hannah Faulkner.	22	MS. WIESE: Objection, foundation.
23	She's wonderful. She's a gifted 16-year-old. She's	23	THE WITNESS: I mean, I don't know. I don't
24	been on the Tour a couple of times. Kimberly Fletcher,	24	know.
25	Moms for America. So those are a few those are a few	25	BY MR. KLOEWER:
	Page 27		Page 29

1	Q. You are not aware of anybody that	1	A. Well, again, define "employee."
2	A. When you say "employees," there's all type of	2	Q. Well, do you collect a salary from the Tour,
3	employees. I mean, you know, contractors,	3	or are you an independent contractor? What's your
4	subcontractors. You know, you've got you got to	4	relationship?
5	bring in porta-johns, you've got to do air conditioning	5	A. I'm I probably I guess I would be its
6	if you are in a tent. I mean, you know.	6	considered an independent contractor that yeah. So
7	Q. Are you aware of any full-time employees of	7	probably. That's probably a good definition or a good
8	the Tour?	8	description.
9	A. I am not. I mean, that's not something that's	9	Q. And who is the entity on the other side of
10	my business. I don't know.	10	that contract? I described it as the Tour, but who is
11	Q. Do you know if Thrivetime, the Thrivetime Show	v 11	your contract with?
12	makes or sells merchandise at the events?	12	A. I don't you know, I don't recall. I don't
13	A. I know that there's a lot of	13	recall. I'd have to go look at the contract, which I
14	MS. WEISS: Objection.	14	haven't looked at in probably three years.
15	THE WITNESS: I'm sorry. Go ahead.	15	Q. And what are the terms of the contract? Do
16	MS. WEISS: I was objecting on foundation.	16	they include payment terms for you? Or what is the
17	THE WITNESS: Yeah. I mean, there's	17	contract meant to address?
18	there's 15 to 20 vendors at every, you know you	18	A. Yeah, they do. They included a travel,
19	know, some. And the vendor the vendor audience	19	lodging, security, and initially a speaking fee.
20	has grown over time, because, you know, because	20	Q. Okay. And do you collect a speaking fee from
21	they they have merchandise to sell. So there's	21	every event?
22	a lot of vendors that attend these.	22	A. From every event? You mean, these these
23	BY MR. KLOEWER:	23	events or every event or what? Every time I speak?
24	Q. Do you personally sell merchandise at the	24	Q. Yes.
25	events?	25	A. Yes what?
	Page 30		Page 32
1	A. I do.	1	Q. Are you paid for your appearances on the Tour?
2	Q. What type of merchandise do you sell?	2	A. I was for well, for lodging,
3	A. Books primarily, and apparel.	3	transportation, security. And initially I was taking a
.	Q. And are you selling that as you personally or	4	
4	Q. This are you senting that as you personally of	4	speaking fee, but I haven't taken one in a while,
5	is that through an entity that you run?	5	speaking fee, but I haven't taken one in a while, probably the better part of a year or more, just because
5	is that through an entity that you run?	5	probably the better part of a year or more, just because
5 6	is that through an entity that you run?  A. It's through an entity.	5 6	probably the better part of a year or more, just because the you know, they are they are the tours are
5 6 7	is that through an entity that you run?  A. It's through an entity.  Q. And what is the name of that entity?	5 6 7	probably the better part of a year or more, just because the you know, they are they are the tours are really, at best, break even.
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1	of 2023, you were collecting \$15,000 per appearance on	1	MS. WEISS: Object to the form.
2	the Tour. Am I understanding that correctly?	2	THE WITNESS: Yeah. I'm not saying I mean,
3	A. For for yes. So about I'd say it	3	you're asking financial problems. I don't know of
4	might even be longer. I'd have to go back and look at	4	financial problems. I just know that they do these
5	when I stopped asking for speaking fee. But it's been	5	things, you know, it comes at a cost. And I
6	well over a year.	6	personally felt that I didn't need to be paid, I
7	Q. Who else collects a speaking fee on the Tour?	7	didn't need to be compensated for my speaking fees
8	A. No idea. You'd have to ask Clay.	8	for that, for this event, for these events.
9	Q. And have you ever discussed with him which	9	MR. KLOEWER: Let's take a look at what's been
10	speakers are compensated, or should be?	10	previously marked as Exhibit 15.
11	A. No. I haven't really. I know when people are	11	(Exhibit 15, Reopen America LLC profit and
12	asking for too much. I mean, when somebody when we	12	loss document, was previously for identification.)
13	try to get, you know, certain speakers and they're	13	BY MR. KLOEWER:
14	asking like for an ungodly amount of money, and we just	14	Q. Can you see this document, Mr. Flynn?
15	can't you know, I think that the we back out. You	15	A. Reopen America, titled Reopen America LLC
16	know, he'll back out of that because it's just too	16	Profit and Loss?
17	ridiculous.	17	Q. Yes, for January through December of 2022. Do
18	Q. What would you describe as an ungodly amount	18	you see that?
19	of money?	19	A. I do see it, yes.
20	A. I think people that come in and ask I think	20	Q. All right. Sorry. I'll try to get this in a
21	there has been one or two that have asked for 50 or	21	format where you can view it here.
22	100K.	22	So this was produced by Reopen America LLC,
23	Q. And that's that's too much. Has the Tour	23	and they indicate that in the first year the Tour was
24	ever paid that much for any speaker?	24	operating
25	A. I have no idea. And if he did, I probably	25	Oh, sorry. This is sorry, excuse me.
	Page 34		Page 36
1	would have, you know, told him he was dumb.	1	Let's take a look at what's been previously
2	Q. Is your contract that you described, is that	2	marked as Exhibit 13.
3	still in force, as you understand it?	3	(Exhibit 13, Reopen America LLC Profit and
4	A. I believe so.	4	Loss for 2021, was previously for identification.)
5	Q. But you you have stopped requesting	5	BY MR. KLOEWER:
6	compensation for your appearances?	6	Q. And my apologies. This is for the year 2021.
7	A. For the speaking part, yeah, but not for	7	Down here about 10 lines down where my mouse
8	travel, lodging, and security.	8	is hovering, you see this line that says "speaker fees"?
9	Q. So has Mr. Clark told you that that the Tour	9	A. Yeah.
10	couldn't afford to pay you anymore?	10	Q. And on the right-hand column we see \$494,381.
11	A. I just know that in the conversations we have	11	A. Okay.
12	had that these are you know, that these have been	12	Q. If I understand your testimony correctly, you
13	these have been difficult, these have been financially	13	only ever collected \$15,000 per event, correct?
14	difficult for him.	14	A. No, that's not correct.
15	Q. How frequently are those conversations	15	Q. Okay. What's incorrect about that?
16	occurring?	16	A. I also collected travel, transport travel,
17	A. Not not that often. Not that often. I	17	lodging, and security.
18	mean, you know, one specific example was the event we		Q. Understood. As far as your compensation
19	had in Las Vegas that that just absolutely gouged the	19	outside of those that consideration, you were only
20		20	
	Tour, you know. And you know, there's probably some		ever paid \$15,000 per event on top of those other items.
21	legal term for that, but	21	Is that fair?
22	Q. How long would you say you have been aware of		A. Up to a certain up to a certain event,
23	financial problems that the Tour has been having? When		yeah. And then I stopped taking the speaker fees.
24	did this issue first arise?	24	Q. Okay. And in 2021, I don't have the exact
25	A. I Page 35	25	number in front of me, but is it fair to say in general, Page 37
1	rage 33		rage 37

	1.70		
1	the Tour does about one appearance per month, or was a		I understand your testimony to be that your
2	that time?	2	fee per event is 15, on five, \$15,000
3	A. Yeah. We were yeah, about one a month.	3	A. Yeah.
4	Yeah, yeah, during that time.	4	Q so we're clear on the record about that.
5	Q. All right. So if we just estimate that you	5	A. Yeah.
6	started in April, call it eight events for the year,	6	Q. But your rate didn't increase in 2022, did it?
7	that would be \$120,000 that you personally collected in	7	A. No, no. It actually decreased. It probably
8	speaker fees for 2021. Is that a fair estimate?	8	decreased in that time, starting toward the end of the
9	A. I'm not a math major, so I'll go with your	9	year.
10	math. I mean, I guess. I mean	10	Q. Was it your understanding that the Tour was
11	Q. All right. So we can assume from these	11	losing money by the end of 2022?
12	numbers then that other speakers, that upwards of	12	A. I don't know. I have it's not something
13	\$350,000 was paid to other speakers on the Tour that	13	that I was what you are showing me here is just not
14	year. Does that strike you as a fair assumption?	14	something that I'm familiar with.
15	A. I mean, that's your assumption. Yeah, I	15	Q. And we'll take a quick look at Exhibit 17.
16	guess, that's if you assume that. Sure.	16	This is the same document from 2023.
17	Q. And then if we scroll down here, we see	17	(Exhibit 17, Reopen America LLC Profit and
18	salaries and wages where my mouse is hovering. It	18	Loss for 2023, was previously for identification.)
19	indicates \$244,011. I just want to confirm I understood	19	BY MR. KLOEWER:
20	your prior testimony correctly. You are not aware of	20	Q. Here in speaker fees we see \$779,490. Do you
21	anyone who is a full-time employee of the Tour; is that	21	see what I am indicating there?
22	correct?	22	A. I can, yeah.
23	MS. WEISS: Object to the form.	23	Q. Were you collecting a fee at all during 2023,
24	And, Brad, I'm going to and foundation.	24	or had you stopped?
25	This isn't a document that he is familiar with. So Page 38	25	A. 2023? I don't think so. I don't think so. I Page 40
1	I object to this line of questioning.	1	think I had stopped taking the speaker fees. Again, I
2	MR. KLOEWER: Understood. I'm just trying to	2	always took I always requested travel,
3	understand what his familiarity is with the	3	transportation, security so I, you know, I wasn't
4	workings of the Tour.	4	completely out of pocket.
5	THE WITNESS: It's zero, Brad. I have zero	5	Q. Do you know how the Tour generates revenue?
6	familiarity with what you are showing me and what	6	A. I have no idea.
7	you are asking. I mean, I really do. That's	7	Q. Well, they sell tickets, right?
8	none that's none of my business.	8	A. Yeah. I mean, right.
9	BY MR. KLOEWER:	9	Q. Do you know about how many tickets are sold
10	Q. We'll skip ahead to what's been previously	10	per event?
11	marked as Exhibit 15.	11	A. I don't have I mean, I could guess, but I
12	This is what we briefly looked at a moment	12	would be guessing. So, you know, whatever they're
13	ago. Same document from 2022. In this instance we see	13	usually sold out. They average about I would say
14	speaker fees here have gone up substantially from the	14	anywhere from 2,500 to I think we have had highs of like
15	year prior. This indicates \$1,744,751 in speaker fees	15	9,000. So
16	issued in 2022. I just want to confirm that the same is	16	Q. And how much do tickets cost?
17	true as far as your compensation, that you were	17	A. I don't know.
18	collecting \$15,000 per event throughout the year of	18	Q. You described yourself before as Mr. Clark's
19	2022. Correct?	19	guidance counselor. It sounds like you haven't provided
20	A. For a period. I don't recall exactly when. I	20	any guidance on the financial aspects of the Tour. Is
21	could go back and find probably find that out. But I	21	that fair?
22	don't recall exactly when I stopped taking one five.	22	MS. WEISS: Object to the form.
23	I'm hearing you say 50, and it wasn't 50, it was 15.	23	THE WITNESS: Yeah. I mean that's fair. You
24	Q. Sorry. I've got a bit of a cold. If I'm	24	know, he's he's a smart guy.
25	misspeaking, I apologize.	25	BY MR. KLOEWER:
	Page 39		Page 41

1	Q. What topics would you say you're fairly	1	MR. GREAVES: Yes.
2	described as his guidance counselor on?	2	MR. KLOEWER: Okay.
3	A. I mean, he's he's about the age of my sons,	3	MR. GREAVES: I'm here. Is Melissa here? I
4	so I talk to him about life issues, I talk to him about	4	may give her another minute here.
5	family issues, I talk to him about children, I talk to	5	MR. KLOEWER: Melissa, we are just waiting for
6	him about a lot of things. You know, we talk about	6	you here. Can you hear me?
7	the we talk about the, you know, the Tour itself and,	7	Okay. Let's go back off the record until
8	you know, how hard it is, how exhausting it is. And so	8	Melissa hops back on.
9	we you know, he's able to share, you know, things	9	THE VIDEOGRAPHER: Okay. Please stand by.
10	with me that like that. And because it's you	10	The time now is 11:01 11:02 a.m., and we are
11	know, he doesn't have a lot of people you know, he's	11	going off the record.
12	like anybody, you know, you find you find people that	12	(A recess was had.)
13	you can talk to. And he and I have a good relationship	13	THE VIDEOGRAPHER: The time now is 11:03 a.m.,
14	like that.	14	and we are back on the record. And you may
15	Q. Would you say Mr. Clark could call you to	15	proceed.
16	discuss any matter that he has concerns about?	16	BY MR. KLOEWER:
17	A. Not necessarily, no, no.	17	Q. All right, Mr. Flynn. Before we went off the
18	Q. Are there topics he couldn't discuss with you?	18	record we were discussing the means by which the Tour
19	MS. WEISS: Object to the form. Foundation.	19	generates revenue. We briefly discussed ticket sales.
20	THE WITNESS: Yeah. I mean, yeah, a lot of	20	I want to talk a little bit about the
21	topics.	21	merchandising that the Tour does. You said you sell
22	BY MR. KLOEWER:	22	·
23	Q. Like what?	23	merchandise through Resilient Patriot at the Tour events
24	A. You tell me.		yourself. Is that correct?
25		24	A. That's correct.
23	MS. WEISS: Same objection.  Page 42	25	Q. And so that would be additional income that  Page 44
1 4	DV MD WI OFWED		11 . 1
1	BY MR. KLOEWER:	1	you collect by virtue of your tour appearances as well,
2	Q. I just want to understand if Mr. Clark had a	2	correct?
2 3	Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you	2 3	correct?  A. That's correct.
2 3 4	Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you THE VIDEOGRAPHER: I'm sorry.	2 3 4	correct?  A. That's correct.  Q. Do you have an understanding of how vendors
2 3 4 5	<ul> <li>Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you THE VIDEOGRAPHER: I'm sorry.</li> <li>Q he has the ability to reach out to you if</li> </ul>	2 3 4 5	correct?  A. That's correct.  Q. Do you have an understanding of how vendors are
2 3 4 5 6	<ul> <li>Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you THE VIDEOGRAPHER: I'm sorry.</li> <li>Q he has the ability to reach out to you if he has questions, right?</li> </ul>	2 3 4 5 6	correct?  A. That's correct.  Q. Do you have an understanding of how vendors are  THE VIDEOGRAPHER: He dropped, Brad.
2 3 4 5 6 7	Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you THE VIDEOGRAPHER: I'm sorry. Q he has the ability to reach out to you if he has questions, right? THE VIDEOGRAPHER: He dropped.	2 3 4 5 6 7	correct?  A. That's correct.  Q. Do you have an understanding of how vendors are  THE VIDEOGRAPHER: He dropped, Brad.  MR. KLOEWER: Well, this is precisely why we
2 3 4 5 6 7 8	<ul> <li>Q. I just want to understand if Mr. Clark had a question about a matter and he reached out to you THE VIDEOGRAPHER: I'm sorry.</li> <li>Q he has the ability to reach out to you if he has questions, right?</li> <li>THE VIDEOGRAPHER: He dropped.</li> <li>MR. KLOEWER: Okay.</li> </ul>	2 3 4 5 6 7 8	A. That's correct. Q. Do you have an understanding of how vendors are THE VIDEOGRAPHER: He dropped, Brad. MR. KLOEWER: Well, this is precisely why we requested an in-person deposition. But
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1	He left for a while and we tried to determine what	1	I if I gave you a number.
2	the cause of these problems are. He appears to	2	Q. Do you recall what the most you ever made at
3	have moved to a new location and we are going to	3	any event through merchandise sales was?
4	try again. But we have been having consistent	4	A. A couple of thousand dollars.
5	technical difficulties with the remote deposition	5	Q. And forgive me if I asked this before, but
6	so far.	6	when you are paid as a speaker on the Tour, those
7	BY MR. KLOEWER:	7	payments also process through Resilient Patriot; is that
8	Q. Mr. Flynn, before we had to go off the record	8	correct?
9	again, we were talking about the means by which the Tour	9	A. Yes, yes.
10	generates revenue, and we were talking a bit about	10	Q. Do you ever promote any of the other endeavors
11	merchandise sales. You sell merchandise at the Tour	11	that you're involved with on the Tour? And, for
12	through Resilient Patriot, as we have established. Do	12	example, The America Project. Have you ever promoted
13	you have a booth at the Tour? How exactly do you sell	13	The America Project at any tour events?
14	that merchandise?	14	A. I may have.
15	A. Yes, there's a booth.	15	Q. Do you direct people to The America Project
16	Q. Okay.	16	website?
17	A. Or a table.	17	A. I may have.
18	Q. And what type of merchandise do you sell? I	18	Q. Requested donations to The America Project?
19	believe you indicate books. Anything else?	19	A. I may have. You know, I don't recall.
20	A. Books and apparel.	20	Q. Are there any other entities or projects that
21	Q. Okay. And do you have a contract with the	21	you're involved with that you have promoted at tour
22	Tour to have that booth present at events? What does	22	events?
23	that relationship look like?	23	A. I'd say that I do I promote a lot of the
24	A. I have a contract with with the Tour.	24	people that are there. I mean, I always, you know, help
25	Q. Is that separate and distinct from the	25	out some of the I will go do stuff to talk to the
	Page 46		Page 48
1	contract we discussed before regarding your compensation	1	other vendors. So, I mean, I try to do a lot of things
2	and your incidentals for security? I'm speaking	2	with the folks that are there to help them. These are
3	specifically with respect to the merchandise, the vendor	3	people that are all struggling to make a buck.
4	booth that you have.	4	Q. But as for your own personal endeavors, are
5	A. I think it's part of the contract that I have	5	there any others beyond The America Project that you
6	with them.	6	have promoted at tour events?
7	Q. Okay. Are you certain that it's part of it,	7	A. Sure. Yes.
8	or you just believe that to be the case?	8	Q. And what would those be?
9	A. I just believe that to be the case. Like I	9	A. I mean, like I've said, I've promoted the
10	said, I don't think I have looked at the contract in a	10	childhood autism, Moms for America are two. I've
11	couple years.	11	promoted people to go watch some of the podcasts that
12	Q. What role do you play, if any, in working to	12	some of these people have. So, I mean, I would say a
13	get vendors to come to the Tour to sell merchandise?	13	range of the people that attend.
14	A. I don't really play a role.	14	Q. Do you agree that the Tour is an opportunity
15	Q. Do you know if the other vendors have	15	for cross-marketing, meaning to promote these other
16	contracts with the Tour to set up a table and sell their	16	third parties and individuals?
17	merchandise?	17	A. I'm not really sure what that means.
18	A. I don't.	18	Q. Well, one of the benefits of the Tour is being
19	Q. And how much revenue have your vendor sales	19	able to provide a platform for these other efforts, like
20	through Resilient Patriot generated during the time of	20	the autism one you described or Moms for America, for
	the Tour?	21	example. Correct?
21			A. Sure. Yes.
22	A. I can't I really don't know.	22 23	
23	Q. Can you estimate on average about how much		Q. Does the Tour ever engage in donations or
24	merchandise Resilient Patriot sells at any given event?	24	collecting donations for individuals or causes at tour
25	A. It's up and down. I would being guessing if Page 47	25	events?

1	A. Yes.	1	Q. How often do you promote that fundraiser?
2	Q. What are some of those causes?	2	A. I don't I don't recall. Actually, I didn't
3	A. Legal fees. Primarily I think legal fees,	3	even recall that, doing that.
4	people that are people that are being, you know	4	Q. Okay. Well, that fundraiser has been up for a
5	that are involved in some type of legal action and legal	5	while, since at least early 2022. Is it your testimony
6	Defense Fund fees type things.	6	that's the only time you have ever directed donations to
7	Q. Does that include the legal Defense Fund that	7	that fund?
8	arises from this particular case?	8	A. You know, I don't recall. I mean, that's
9	MS. WEISS: Object to the form.	9	that's you know, is there a problem with directing
10	THE WITNESS: Yeah, I don't I don't I	10	people to help somebody out who is being sued?
11	have no idea.	11	Q. Well, I do have some questions about that
12	BY MR. KLOEWER:	12	fundraiser. We just looked at the image there and it
13	Q. Have you ever encouraged people to donate	13	says, "ReAwaken America versus Dominion Lawsuit."
14	funds to support Clay Clark in this particular lawsuit?	14	Did you see that on the page?
15	A. I don't believe I have.	15	A. I didn't, no.
16	Q. Let's take a look at what has been previously	16	Q. Let's take a look here. I'll show you again.
17	marked as Exhibit 10, a clip. Let's see here. 6. This	17	(A video clip was played as follows:)
18	is from August 23rd, last year. This occurred in Las	18	MR. FLYNN: Before I make mention of one
19	Vegas. Let me share my screen here.	19	thing, I want to bring up. There's a donation
20	(A video clip was played as follows:)	20	page. Clay will never do this. I'm going to do
21	MR. FLYNN: Before I make mention of one	21	it. And he didn't know I'm going to do it. But on
22	thing, I want to bring up. There's a donation	22	that TimeToFreeAmerica, if you can bring up the
23	page. Clay will never do this. I'm going to do	23	donation button. Right there. Okay? So so
24	it. And he didn't know I'm going to do it. But on	24	it's off of the off of the main page,
25	that TimeToFreeAmerica, if you could bring up the	25	TimeToFree
	Page 50		Page 52
1	donation button. Right there. Okay.	1	(The playing of the video clip stopped.)
2	So so it's off of the off of the main	2	BY MR. KLOEWER:
3	page, TimeToFreeAmerica, donate. And I'll tell	3	Q. Right there, Mr. Flynn. You see that? The
4	you, to do this you know, and I have been up	4	fundraiser is designated as ReAwaken America versus
5	here whining for the last couple of days about all	5	Dominion Lawsuit Defense Fund.
6	the nonsense that we've gone through for this	6	Do you see that?
7	particular event, but all these events. But if you	7	A. I can barely see it, but, yeah, I understand
8	just want to, you know, if you just want to help	8	what you're saying.
9	out, five bucks, ten bucks, whatever it is, that	9	Q. Okay. Do you have an understanding of why
10	that donation button goes to helping these events.	10	this lawsuit, this fundraiser describes itself as being
11	We're going to continue to do these we are	11	ReAwaken America versus Dominion?
12	going to try to do in fact, we have probably	12	A. I don't.
13	three more for sure, and we are looking at another	13	Q. I'm going to skip ahead here to the 40-second
14	10. Okay? And we do this through the good graces	14	mark. And you state here that the donation button goes
15	of you, you know, the people that do help us out.	15	to helping these events. Let's listen to that again
16	And there's there's a whole bunch of people that	16	real quick.
17	help us out. But if you want to if you want to	17	And here we can see more clearly the image of
18	donate, it doesn't matter what you donate. Okay?	18	the fundraiser on screen. And beneath here where my
19	And so that's the that's the donate page. And	19	mouse is hovering, it indicates that Eric Coomer, the
20	it helps. Every little bit helps.	20	former director of strategy and security for Dominion
21	(The playing of the video clip stopped.)	21	Voting Systems, has filed a lawsuit against Clay Clark
22		22	and the ReAwaken America Tour.
44	BY MR. KLOEWER:		and the Relivation I mierica Tour.
23	Q. Okay. So you actually have directed donations	23	Let's play this from the 38-second mark.
23	Q. Okay. So you actually have directed donations	23	Let's play this from the 38-second mark.

1	helping these events. And we're going to continue	1	THE WITNESS: I don't really know. I mean, I
2	to do these we're going to try to do in fact,	2	don't really know. I know that there's a lot of
3	we have probably three more for sure, and we're	3	there's a lot being contested. I know that. But I
4	looking at another 10. Okay? And we do this	4	don't know that to be true or not.
5	through the good graces	5	BY MR. KLOEWER:
6	(The playing of the video clip stopped.)	6	Q. Have you seen credible evidence that Dominion
7	BY MR. KLOEWER:	7	Voting Systems rigged the 2020 presidential election?
8	Q. How does donating money to this legal Defense	8	A. No, I don't really know.
9	Fund help put on ReAwaken America Tour events?	9	Q. You don't know if you've seen credible
10	A. I don't know.	10	evidence that Dominion Voting
11	MS. WEISS: Objection, foundation.	11	A. Well
12	THE WITNESS: Yeah. And made it's the	12	Q Systems rigged the presidential
13	statement I made. You know, maybe it's maybe	13	MR. GREAVES: Objection, asked and answered.
14	it maybe it's not too as specific as I could	14	THE WITNESS: Yeah. I mean, I you know.
15	have been, but it's what I said.	15	Right. I don't know. No. Because you are saying
16	BY MR. KLOEWER:	16	"credible." I mean, evidence? Yeah. I have seen
17	Q. You don't have any basis for having told	17	a lot of evidence. I mean, you know, a lot of
18	people that?	18	stuff, I've read a lot of reports. You know,
19	A. No. Just asking people to donate to a legal	19	credibility is in the eye of the legal system to
20	Defense Fund.	20	determine.
21	Q. Do you think it's important to be careful with	21	BY MR. KLOEWER:
22	your language, discussing things like that?	22	Q. You are not comfortable under oath today
23	A. Yeah. It's always important to be careful	23	stating, identifying any evidence you would describe as
24	with your language. Sure.	24	credible
25	Q. Okay. Now, we just discussed, that fundraiser Page 54	25	MR. GREAVES: I'm going to object. Right Page 56
1	is being designated as being against Dominion. Who do	1	now
2	you understand Dominion to be in that context?	2	THE WITNESS: Yeah, come on.
3	A. In the context of what?	3	MS. WEISS: Hold on, hold on, General Flynn.
4	Q. ReAwaken America versus Dominion lawsuit.	4	I'm going to object and I'm going to advise my
5	What is "Dominion" referring to there?	5	client at this point not to answer these questions
6	MS. WEISS: Objection, foundation.	6	based on his Fifth Amendment rights under the U.S.
7	And my microphone was on mute earlier, and I	7	Constitution. We are getting into territory here
8	didn't realize it. So I can't remember the	8	that there are active investigations going on. So
9	question now that I had objected to, but it was the	9	this line of questioning we're not going to go any
10	line of questioning about the statements about the	10	further on, and General Flynn is going to assert
11	elections or I'm sorry, the donation button.	11	his Fifth Amendment rights.
12	THE WITNESS: Yeah.	12	MR. KLOEWER: Well, I'm going to keep the
13	BY MR. KLOEWER:	13	asking questions. I'm asking questions of opinion
14	Q. Mr. Flynn, who do you understand Dominion to	14	based on his personal knowledge of information that
15	be?	15	he has seen. I don't think invocation of the Fifth
16	A. I think it's a voting system that we use in	16	Amendment when it's not being asserted with a good
17	this country.	17	faith belief that the response would furnish a link
18	Q. Okay. And it's your belief that Dominion	18	in a change of evidence needed to prove a crime is
19	Voting Systems rigged the 2020 presidential election.	19	proper. So
20	Is that correct?	20	MR. GREAVES: Mr. Kloewer, that's a
21	A. I don't have any any comment on that.	21	misstatement of the law. But you can ask your
22	Q. Well, do you believe that Dominion Voting	22	question and my client will assert his rights if he
23	Systems rigged the 2020 elections? It's a "yes" or "no"	23	needs to. Any argument about that is going to have
		23 24	needs to. Any argument about that is going to have to be taken off the record and in court.
23	Systems rigged the 2020 elections? It's a "yes" or "no" question.  MR. GREAVES: Objection, foundation.		

case law from Horida when I made that statement.  Were discussed in this various communications prior to this deposition regarding improper invocation of the Hifth Amendment. I can give you some case cites, if you would like. But when I'm asking questions of opinion about what occurred in the 2020 election, I do not believe that as proper invocation of the Hifth Amendment and it is unnecessarily obstructing the conduct of this or of this deposition.  So I'm going to keep asking the questions, and the world of the proceed with this line of questioning.  By MR. KLOEWER:  Q. What evidence have you Let's discuss this, Mr. Flynn, because you would you what's the difference between credible evidence and evidence that's not credible, in your opinion? What makes something credible, in your opinion? What makes something credible; and the process of				
mirrocation of the Fifth Amendment. Lean give you a saking questions of opinion about what occurred in asking questions of opinion about what occurred in the 2020 election, I. do not believe that's a proper invocation of the Fifth Amendment and it is unnecessarily obstructing the conduct of this — of this deposition.  So I'm going to keep asking the questions, and we'll proceed with this line of questioning. It's also irrelevant, it's overly burdensome. Need I go on?  MR. KLOEWER: No. And I will reiterate my position that this is a violation of Rule 30, obstructing the conduct of this — of this deposition.  So I'm going to keep asking the questions, and we'll proceed with this line of questioning.  BY MR. KLOEWER: No. And I will reiterate my position that this is a violation of Rule 30, obstructing the deposition improperly through improper invocation of a privilege that does not apply.  Let's discuss this, Mr. Plynn, because you to opinion? What makes something credible?  A. You know, something — 20  A. You know, something — 21  MR. GREAVES: Objection, My client is here as a fact witness, not as an expert witness. And, moreover, I'm advising him to assert hand, moreover hand, it's overly burdensome. Need I go on?  MR. KLOEWER: No. And I will reiterate my position that this is a violation of Rule 30, obstructing the deposition improperly through improperly through improperly thr	1	case law from Florida when I made that statement.	1	Q. When you are trying to determine credibility
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some case cites, if you would like. But when I'm asking questions of opinion bout what occurred in the 2020 election. I do not believe that's a proper invocation of the Fifth Amendment and it is a unnecessarily obstructing the conduct of this — or this deposition.  So I'm going to keep asking the questions, and I'm good on?  Well proceed with this line of questioning.  BY MR. KLOEWER:  Q. What evidence have you — Les discuss this, Mr. Flynn, because you seem to have a concern about the term "credible." How dould you — what's the difference between credible evidence and evidence that's not credible; in your opinion? What makes something redible?  MR. GREAVES: Advise my client to exercise his Fifth Amendment rights.  MR. GREAVES: Soly know, your seem to have a comment about the term "credible." How don't really understand what you're asking me. Laby You know, something — Page 58  MR. GREAVES: Soly Line and Jungers and	3	prior to this deposition regarding improper	3	MR. GREAVES: Objection. My client is here as
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munecessarily obstructing the conduct of this or this deposition.  So I'm going to keep asking the questions, and live of the position of the this is a violation of Rule 30, we'll proceed with this line of questioning.  BY MR. KLOEWER:  Understand would you what sit end fifterence between credible evidence and evidence that's not credible, in your opinion? What makes something redible?  MR. GREAVES: Advise my client to exercise his like Will understand what you're asking me.  MR. GREAVES: Yeah. I mean, yeah. Exactly.  I Mayer, so you know, I'm going to you know, if you want to go down this, then I will exercise my printing when intelligence is credible of the not.  Mandment right.  Q. Well, you are A. I mnot a lawyer, Brad. Come on. I'm not a lawyer, so you know, I'm going to you know, if you want to go down this, then I will exercise my printing when intelligence is credible or when it is not.  A. I understand who I am, Brad. Don't don't patronize me. Okay? Don't patronize me. And I understand. You're now you're now going into a territory where you're saying I'm a top ranking guy, and then use my proper title. How about that?  Q. That's fair. General Flynn, ou have perhaps more experience than well, certainly more experience than anyone in this conversation with respect to determining when intelligence is credible or when it is not.  A. Uh-huh (Affirmative response).  Q. You're career has dealt with those issues in many instances. So surely you have an opinion about when you can determine a piece of evidence is credible with your question?  MR. KLOEWER:  Sepa 58  MR. KLOEWER: No. I have not not a consider credible, Mr. Flynn, that Eric Coomer priged the 2020 presidential election? Yes or one.  A. I have not, no.  A. I have you seen any evidence that E	7	the 2020 election, I do not believe that's a proper	7	also irrelevant, it's overly burdensome. Need I go
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11	9	unnecessarily obstructing the conduct of this or	9	-
12   we'll proceed with this line of questioning.   13   BY MR. KLOEWER:   13   apply.   15   Let's discuss this, Mr. Flynn, because you seem to have a concern about the term "credible." How would you what's the difference between credible evidence and evidence that's not credible, in your opinion? What makes something credible?   19   A. You know, something   20   A. You know, something   21   MR. GREAVES: Advise my client to exercise his 21   220   Fifth Amendment rights.   22   MR. KLOEWER:   23   The WITNESS: Yeah. I mean, yeah. Exactly.   1 don't really understand what you're asking me.   24   BY MR. KLOEWER:   25   BY MR. KLOEWER:   26   MR. GREAVES: Objection. The not a lawyer, so you know, I'm going to you know, if you want to go down this, then I will exercise my Fifth Amendment right.   4   MR. Amendment right.   5   MR. KLOEWER:   25   MR. KLOEWER:   26   MR. GREAVES: Objection, foundation.   27   MR. GREAVES: Objection, foundation.   28   MR. KLOEWER:   29   MR. GREAVES: Objection, foundation.   29   MR. KLOEWER:   20   MR. GREAVES: Objection, foundation.   20   MR. GREAVES: Objection, foundation.   20   MR. GREAVES: Objection on I'm not a lawyer, so you know, I'm going to you know, if you want to go down this, then I will exercise my Fifth Amendment right.   4   MR. GREAVES: Objection on I'm not a lawyer, so you know, I'm going to you know, if you understand who I am, Brad. Don't don't patronize me. Okay? Don't patronize me. And I   9   understand. You're now you're now going into a territory where you're saying I'm a top ranking guy, and to then use my proper title. How about that?   9   A. I don't really know him.   10   Wall on the manyone in this conversation with respect to determining when intelligence is credible or when it is not. So   A. I don't really know him well. I just -1   A. I -1 do know who he is, yeah. Yeah, I do know.   Q. Who id you understand	10	this deposition.	10	position that this is a violation of Rule 30,
13 apply.  14 Q. What evidence have you — 15 Let's discuss this, Mr. Flynn, because you 16 seem to have a concern about the term "credible." How would you — what's the difference between credible evidence and evidence that's not credible, in your 17 would you — what's the difference between credible evidence and evidence that's not credible, in your 18 opinion? What makes something credible? 20 A. You know, something — 21 MR. GREAVES: Advise my client to exercise his fight Amendment rights. 22 Fifth Amendment rights. 23 THE WITNESS: Yeah. I mean, yeah. Exactly. 24 I don't really understand what you're asking me. 25 BY MR. KLOEWER: 26 Page 58 27 Page 58 28 Page 58 29 Well, you are— 20 Q. Well, you are— 21 A. I'm not a lawyer, so you know, I'm going to — you know, if you want to go down this, then I will exercise my Fifth Amendment right. 26 Q. You're a top ranking military— 27 A. I understand who I am, Brad. Don't — don't patronize me. Okay? Don't patronize me. And I understand. You're now — you're now going into a territory where you're saying I'm a top ranking guy, and to territory where you're saying I'm a top ranking guy, and to territory where you're saying I'm a top ranking guy, and to determining when intelligence is credible or when it is not. 20 A. Uh-huh (Affirmative response). 21 Q. That's fair. General Flynn, you have perhaps more experience than — well, certainly more experience than anyone in this conversation with respect to determining when intelligence is credible or when it is not. So— 22 MR. GREAVES: Objection. Are you finished with your question? 23 MR. GREAVES: Objection. Are you finished with your question? 24 MR. KLOEWER: 25 MR. KLOEWER: 26 A. No idea af I have seen anything like that. 27 Q. That's fair. General Flynn, you defered the evidence that Fric Coomer to be, General Flynn, ou have perhaps more experience than — well, certainly more experience than out that? 26 Q. You're a top ranking guy, and to territory where you're saying I'm a top ranking guy, and to territory where you're say	11	So I'm going to keep asking the questions, and	11	obstructing the deposition improperly through
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1	Q. Who introduced you?	1	Coomer, our client, partook in an Antifa conference call
2	A. I don't recall. Don't know.	2	and claimed on that call to have rigged the election.
3	Q. Did you meet him in 2020?	3	You are familiar with that, aren't you?
4	A. I don't remember if I did.	4	A. I am not, actually. I don't recall if I am.
5	Q. You were familiar with the allegations about	5	Q. So you're telling me you co-starred in The
6	Eric Coomer as early as November of 2020, weren't you'	? 6	Deep Rig and you didn't even watch it?
7	A. I don't recall.	7	A. I don't know if I watched it, no. I can't sit
8	Q. We'll get into that in a bit.	8	here and tell you that I watched it, no.
9	I tell you what. You've stated before that	9	Q. Let's take a look at some of the things that
10	you have watched every presentation on the ReAwaken	10	Mr. Oltmann has said on stage with the ReAwaken America
11	America Tour, correct?	11	Tour. I'm going to show you so we previously
12	MR. GREAVES: Objection, mischaracterization	12	designated the audio and video clips from this
13	of testimony.	13	proceeding as Exhibit 19. We'll designate this as Clip
14	BY MR. KLOEWER:	14	2.
15	Q. What have I missed? What did I get wrong	15	This was Oltmann's first appearance on the
16	there, General Flynn?	16	ReAwaken America Tour at an event on July 18th, 2021, in
17	A. I try to watch as many as possible, but	17	Anaheim, California.
18	obviously there's two, two to three days of events. So	18	(A video clip was played as follows:)
19	I try to watch as many as possible.	19	AN INDIVIDUAL: Ladies and gentlemen, one more
20	Q. You have seen at least one of Mr. Oltmann's	20	time let's hear it for Pastor Todd Coconato. Yeah.
21	presentations. He was on the Tour many times. I	21	All right, now.
22	presume you have seen him present on stage before,	22	AN INDIVIDUAL: anybody with a massive
23	correct?	23	beard with a little
24	A. I don't recall if I ever if I ever I	24	(The playing of the video clip stopped.)
25	mean, if he I know he has been on there, but it's	25	MR. KLOEWER: Okay. For the record, I'm
	Page 62		Page 64
1	been a while. But I don't recall.	1	skipping forward in this clip to the one minute,
2	Q. Why is Mr. Oltmann a speaker on the Tour, as	2	45-second mark.
3	you understand it?	3	(A video clip was played as follows:)
4	A. I don't know.	4	MR. OLTMANN: nominee. I was a finalist in
5	Q. What does he bring to the table?	5	2020. They told me Ernst & Young, entrepreneur of
6	A. No idea.	6	the year
7	Q. What topic is he there to discuss?	7	(The playing of the video clip stopped.)
8	A. No idea.	8	BY MR. KLOEWER:
9	Q. You don't have any idea what Joe Oltmann	9	Q. Sorry. I'm rewinding here. Let me come back
10	discusses on the ReAwaken America Tour?	10	to the one-minute 40-second mark. This is Mr. Oltmann
11	A. If he walked in the door right here in this	11	describing his credentials on stage. And we can see
12	office I'm in, I wouldn't even recognize him.	12	your image emblazoned on the backdrop here as well,
13	Q. You say this even having co-starred in the	13	General Flynn. Let's proceed here with the clip.
14	film The Deep Rig with Mr. Oltmann?	14	(A video clip was played as follows:)
15	A. Okay.	15	MR. OLTMANN: tech company. I was a
16	Q. You are telling me under oath you wouldn't	16	two-time Ernst & Young entrepreneur of the year
17	recognize Joe Oltmann if he walked in the door?	17	nominee. I was a finalist in 2020. They told me
18	A. I really haven't seen him in a while. I mean,	18	if you walk away from politics you will win.
19	I don't the last time I saw him I was in an audience	19	If anybody knows about the tech world, I built
20	of about 1,000 people in Missouri maybe six months ago		my company on a cocktail napkin over nine years.
21	eight months ago, and that was the last time I saw him.	21	We represent some of the biggest clients across the
22	I don't know. I really don't. He's not he's not	22	country.
23	somebody that I am I know who he is. I'm not	23	And I said, I can't do that.
24	familiar with him, no.	24	If I'm being truthful, I could have walked
25	Q. You're familiar with his claims that Eric	25	away and gone and drank a Mai Tai on a beach and
	Page 63		Page 65

1 just lived out the rest of my life. 2 (The playing of the video elip stopped.) 3 BYMR, KLOFWRIE: 4 Q. Is this refreshing your recollection, Mr. 5 Flynn, about who be Offuman is? 6 A. As far as what? I mean, I don't remember 7 seeing this, no. 7 Q. Well, you recognize him, don't you? 8 Q. Well, you recognize him, don't you? 8 Q. Well, you recognize him, don't you? 9 A. I guess I do, yeah. I mean, he — be looks 10 Q. You stated before that you, along with 11 Gardin familiat. 12 do a stage for the first time at the ReAwaken America 13 time. What did you do to vet Mr. Oltmann before he came 14 on stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 17 one. 18 Q. So you took no action to investigate who Joe 19 Oltmann was? An I understanding that correctly? 10 Q. The stage of the first time at the Reawaken America 11 that he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he was — that Ernst & Young told him that if he respect to Mr. Oltmann's appearance on the Tour. Is that fair? 10 MS, WEISS: Object to the furm. 11 BYMR, KLOEWER: 12 Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark, it doesn't apply with respect to Mr. Oltmann's appearance on the Tour. Is that fair? 18 MS, WEISS: Object to the furm. 19 MS, Weiks So Object to the furm. 19 MS, Weiks So, Object to the furm. 20 Q. Okay. Let's skip ahead here to about the said. 21 Fine from the counder of lax year, and he said. "Hey, don't worn yeab and I Thun appened to get on a phone call with a guy named Fire Commer back in September of lax year, and he said. "Hey, don't worn yeab out It. Trump is not going to win. I made sure of that." 11 I hat pended to get on a phone call with a guy named Fire Commer back in September of lax year, and he said. "Hey, don't worn yea				
election. You know what happened on the election ight. It wasn't until three days afterwards that I figure dout that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I was really looking at.  Now Well, you recognize him, don't you?  Now Well you feed the was in the was the spokesperson for Dominion Voting Systems, what I was reply looking at was really looking at you believe that led was reply looking at was really looking at I did my research, I do believe that I didn't have to get involved.  Now Well you feed when him being on the video clip stopped.)  Now Well you feed when he was the spokesperson for Dominion Voting Systems, what I was really looking at I did my research, I do believe t	1	just lived out the rest of my life.	1	moved on.
4 Inght. It wasn't until three days afterwards that 1 Figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't until three days afterwards that 1 Figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't until three days afterwards that I figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't until three days afterwards that I figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't until three days afterwards that I figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't until three days afterwards that I figured out that, as somebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't political he would wish in the to until three days afterwards that I figured out that, as omebody sent me an article when his name was in there, and he was the spokesperson for Dominion Voting Systems, what I wasn't political he would wish of 12 to the spokesperson for Dominion Voting Systems, what I wasn't political he would wish of 12 to the spokesperson for Dominion Voting Systems, what I wasn't political he well to the spokesperson for Dominion Voting Systems, what I wasn't able when his name was in there, and he wasn't political for the year, as a figure that you be wasn't political for the your, as a figure that you be wasn't political for the year, as a good on the stage.  1 that he was - that Ernst & Young told him that if he wasn't political he would win entrepreneur of the year, you didn't investigate any of those claims, did you?  2 post of the very of investigate any of those claims, did you?  3 that he	2	(The playing of the video clip stopped.)	2	And it wasn't until three days after the
5 Flynn, about who loc Oltmann is? 6 A. As far as what? I mean, I don't remember 7 seeing this, no. 9 Well, you recognize him, don't you? 9 A. I guest Ido, yeah. I mean, hehe looks 9 I did my research, I do believe thing are 9 providential. I do believe that J didn't have to 9 get involved. 10 familiar. 11 Q. You stated before that you, along with 11 get involved. 12 Mr. Clark, will vet potential speakers from time to 13 time. What did you do to vet Mr. Oltmann before he came 14 on stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 16 Q. So you took no action to investigate who Joe 17 One. 18 Q. So you took no action to investigate who Joe 19 Oltmann wat? Am I understanding that correctly? 19 Oltmann wat? Am I understanding that correctly? 20 A. That's - that's - yeah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired, 26 you didn't investigate any of those claims, did you? 27 A. I did not. 28 Mr. R.K. DEWER: 29 M. Lat's - hat's - yeah. I mean, I don't 29 Go wash You you didn't investigate any of those claims, did you? 30 M. Will Style to the form. 31 THE WITHNESS: That's fair. 32 Page 68 33 Mr. K. LOEWER: 34 A I don't A. I did not. 35 Mr. Clark, it doesn't apply with 46 A Call of the would win entrepreneur of the year, 47 You didn't investigate any of those claims, did you? 48 A. I did not. 49 Mr. W. LOEWER: 40 Q. Okay. So when you described yourself as a 40 guidance counselor to Mr. Clark, it doesn't apply with 41 Frespect to Mr. Oltmann's appearance on the Tour. Is 42 that fair? 43 W. Will Style thing a played as follows: 44 (A video clip was played as follows: 45 Mr. Oltmann's appearance on the Tour. Is 46 Harth R. LOEWER: 47 A. I and the wash and the would win entrepreneur of the year, 48 A Treally don't even remember him being 49 Order that fair? 40 A Devent that fair? 41 A Lembard for the Lo	3	BY MR. KLOEWER:	3	election. You know what happened on the election
A. As far as what? I mean, I don't remember  7 seeing this, no.  9. Well, your recognize him, don't you?  8. R. I guess I do, yeah. I mean, he — he tooks  9. Tally looking at.  10. You stated before that you, along with  11. What did you do to vet Mr. Oltmann before he came  12. On you stated before that you, along with  13. Tour?  14. A I don't recall if I ever got involved in that  15. Tour?  16. A. I don't recall if I ever got involved in that  17. one.  18. Q. So you took no action to investigate who Joe  19. Oltmann was? Am I undestanding that correctly?  10. Oltmann was? Am I undestanding that correctly?  21. remember doing anything like that.  22. Q. Do you know who did?  23. A. I don't.  24. Q. So all these claims he's making here, that he  24. hat he was — that Ernst & Young told him that if he  25. hat hat was — that Ernst & Young told him that if he  26. down, I shought these claims, all your.  17. respect to Mr. Oltmann's appearance on the Tour. Is  18. that fair?  19. MS. WEISS: Object to the form.  10. THE WITNESS: That's fair.  10. Go, Okay, Les's skip ahead here to about the  11. I happened to get on a phone call with a guy named  12. Fric Coomer Pack in September of last year, and he  13. Each of the Lord, so I'm not  14. Q. We just watched a video of you a few minutes  15. ago from this lassmit, and —  15. The Witness: That's fair.  16. A. I chink he — I think he's just stated that  17. the wasn't political he would win entrepreneur of the year,  18. Q. We just watched a video of you a few minutes  19. ago from this lassmit, and —  19. A. I chave. I've talked – talked to him  19. Hab wasn't political he would win entrepreneur of the year,  19. Go, I shis the first time you have no idea  19. What has been political he would win entrepreneur of the year,  20. Okay. So when you described yourself as a  21. guidance counselor to Mr. Clark, it doesn't apply with  22. Q. Do down when who we wasn't have a see	4	Q. Is this refreshing your recollection, Mr.	4	night. It wasn't until three days afterwards that
7 seeing this, no. 9. Well, you recognize him, don't you? 9. A. I gews I do, youh. I mean, he he looks 10. familiar. 10. Worlt, you stated before that you, along with 11. Mr. Clark, will vet potential speakers from time to 12. Mr. Clark, will vet potential speakers from time to 13. time. What did you do to vet Mr. Oltmann before he came 14. on stage for the first time at the ReAwaken America 15. Tour? 16. A. I don't recall if I ever got involved in that 16. Q. So you took no action to investigate who Joe 17. A. I and I understunding that correctly? 18. Q. So you took no action to investigate who Joe 19. Oltmann was? Am I understunding that correctly? 20. A. That's - that's - yeah. I mean. I don't 21. remember doing anything like that. 22. Q. Do you know who did? 23. A. I don't. 24. Q. So all these claims he's making here, that he 25. had hundreds of employees, that he could have retired, 26. wasn't political he would win entrepreneur of the year, 27. you didn't investigate any of those claims, did you? 28. A. I did not. 29. Q. Okay. So when you described yourself as a 29. guidance counselor to Mr. Clark, it doesn't apply with 29. That's fair. 29. MS. WEISS: Object to the form. 20. Okay. Let's skip ahead here to about the 21. The I was making bere and the I was a person who followed 22. G. Okay. Let's skip ahead here to about the 23. The WITNESS: That's fair. 24. (A video clip was played as follows:) 25. MR. OLTMANN: And as a person who followed 26. Jesus that could become an example for them. I 27. A. I main the church of the Lord, so I'm not 28. going to win. I made sure of that." 29. Going to win. I made sure of that." 29. Going to tell you what he said. But I am going to 29. Let's key and wo work pabactil in the reminute mark. 29. Colway. I can be a discount of the Lord, so I'm not 29. Going to win. I made sure of that." 29. Going to win. I made sure of that." 29. Going to win. I made sure of that." 29. Going to win. I made sure of that." 29. Going to win. I made sure of that." 20. Okay. I can be a discou	5	Flynn, about who Joe Oltmann is?	5	I figured out that, as somebody sent me an article
8 Was really looking at. 9 A. I guess I do, yeah. I mean, he - he looks 10 familiar. 11 Q. You stared before that you, along with 11 time. What did you do to ve the Clumban before he came 12 on stage for the first time at the ReAwaken America 13 on stage for the first time at the ReAwaken America 14 on stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 16 Q. So you took no action to investigate who Joe 17 one. 18 Q. So you took no action to investigate who Joe 19 Oltmann was? Am I understanding that correctly? 19 Others was "Am I understanding that correctly? 20 A. That's - that's - yeah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired, 26 wasn't political he would win entrepreneur of the year, 37 you didn't investigate any of those claims, did you? 48 A. I did not. 49 Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark; it doesn't apply with 40 T respect to Mr. Oltmann's appearance on the Tour. Is 41 that Fair? 42 Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark; it doesn't apply with 43 respect to Mr. Oltmann's appearance on the Tour. Is 44 that it is the will be specified to the form. 45 that fair? 46 MR. OLTMANN: And as a person who followed less that could become an example for them. I happened to get on a phone call with a guy named 47 the minute mark. 48 the wasn't political he would win a guy named 49 G. Okay. Let's skip ahead here to about the three minute mark. 49 MR. WEISS: Object to the form. 40 J. Happened to get on a phone call with a guy named 41 the church of the Lord, so I'm not going to win. I made sure of that." 40 J. Happened to get on a phone call with a guy named 41 the minute mark. 41 Lord that he wasn't shall be a play that the said. But I am going to tell you what he said. But I am going to tell you what he said. But I am	6	A. As far as what? I mean, I don't remember	6	when his name was in there, and he was the
A. I guess I do, yeah. I mean, he he looks 10 familiar. 11 Q. You stated before that you, along with 12 Mr. Clark, will vet potential speakers from time to 13 time. What did you do to vet Mr. Olimann before he came 14 on stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 16 one. 17 A. I what Joe Olimann is talking about? I'm 18 Q. So you took no action to investigate who Joe 19 Olimann was? An I understunding that correctly? 20 A. That's - that's - peah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired. 26 Page 66  1 that he was that Ernst & Young told him that if he 2 wasn't political he would win entrepreneur of the year, 3 you didn't investigate any of those claims, did you? 4 A. I did not. 5 Q. Okay. So when you described yourself as a 6 guidance counselor to Mr. Clark, it doesn't apply with 7 respect to Mr. Oltmann's appearance on the Tour. Is 8 that fair? 9 MS. WEISS: Object to the form. 10 THE WITNESS: That's fair. 11 BY MR. KLOEWER: 12 Q. Okay. Let's skip ahead here to about the 13 three minute mark. 14 (A video eigh was played as follows?) 15 MS NGLESS: Object to the form. 16 A. That's hat's - year, and he 17 happened to get on a phone call with a guy named 18 Eric Coomer back in September of last year, and he 19 Gegote to the first time you heard Joe Oltmann 20 going to win. I made sure of that." 21 Lim the chircher of the Lord, so I'm not 22 going to tell you what he said. But I am going to 23 the remained of the video of that." 24 Lim the claim the infiltrated an Antifa conference call with 25 and hundreds of employees, that he could have retired. 26 Page 66  10 that he was that Ernst & Young told him that if he 27 wasn't political he would win entrepreneur of the year, 28 you didn't investigate amy of those claims, did you? 3 you didn't investigate amy of those claims, did you?	7	seeing this, no.	7	spokesperson for Dominion Voting Systems, what I
10 familiar.   10 providential. I do believe that I didn't have to get involved.   11	8	Q. Well, you recognize him, don't you?	8	was really looking at.
11   Q. You stated before that you, along with   12   Mr. Clark, will ver potential speakers from time to   12   (The playing of the video clip stopped.)	9	A. I guess I do, yeah. I mean, he he looks	9	I did my research, I do believe things are
12 Mr. Clark, will vet potential speakers from time to 13 time. What did you do to vet Mr. Oltmann before he came 14 to a stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 16 Q. So you took no action to investigate who Joe 17 Once. 18 Q. So you took no action to investigate who Joe 18 not familiar with this story, aren't 19 Oltmann was? An I understanding that correctly? 19 Q. Is this the first time you heard Joe Oltmann 20 A. That's – that's – yeah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired, 26 Page 66 27 A. I did not. 28 Q. Okay. So when you described yourself as a 29 guidance counselor to Mr. Clark, it doesn't apply with 29 MS. WEISS: Object to the form. 20 THE WITNESS: That's fair. 21 BY MR. KLOEWER: 22 Q. Okay. Let's skip ahead here to about the 23 three minute mark. 24 (A video clip was played as follows.) 25 MR. OLTMANN: And as a person who followed Jesus that could become an example for them. I 29 happened to get on a phone call with a guy named 20 Eric Coomer back in September of last year, and he 21 said, "Hey, don't worry about it. Trump is not going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what the said. But I am going to tell you what the said. But I am going to tell you what the said. But I am going to tell you what lidn't know. I didn't know. I didn't know. I didn't know. I didn't know. I throught these guys were nuts. And then I 20 down. I thought these guys were nuts. And then I 21 firm in the church of the Lord, so I'm not going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you	10	familiar.	10	providential. I do believe that I didn't have to
time. What did you do to vet Mr. Oltmann before he came on stage for the first time at the ReAwaken America 14 Q. All right. Let's pause there. So you're familiar with this story, aren't you?  A. I don't recall if I ever got involved in that 16 you?  A. I don't recall if I ever got involved in that 17 one. 17 A. I — what Joe Oltmann is talking about? I'm not familiar with that story. 18 You heard Joe Oltmann is talking about? I'm not familiar with that story. 19 Q. Is this the first time you heard Joe Oltmann claim that he infiltrated an Antifa conference call with Eric Coomer? 20 A. I really don't remember that. I don't remember doing anything like that. 21 Eric Coomer? 22 A. I really don't remember that. I'm not going to sit here and tell you that I was in the audience even at that time I remember that I'm not going to sit here and tell you that I was in the audience even at that time I remember that being — that one I was — I was walking Page 68 and hundreds of employees, that he could have retired, 25 you didn't investigate any of those claims, did you? 3 you didn't investigate any of those claims, did you? 4 A. I did not. 4 guidance counselor to Mr. Clark, it doesn't apply with respect to Mr. Oltmann's appearance on the Tour. Is that fair? 4 MS. WEISS: Object to the form. 5 MS. WEISS: Object to the form. 6 MS. WEISS: That's fair. 10 THE WITNESS: That's fair. 11 By MR. KLOEWER: 20 Q. Okay. Let's skip ahead here to about the 18 Eric Coomer back in September of last year, and he said, "Hey, don't worry about it. Trump is not going to win. I made sure of that." 20 Q. When you got a subpoena from Eric Coomer — 20 going to win. I made sure of that." 20 Q. When you got a subpoena from Eric Coomer — 21 going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he said. But I am going to tell you what he	11	Q. You stated before that you, along with	11	get involved.
14 on stage for the first time at the ReAwaken America 15 Tour? 16 A. I don't recall if I ever got involved in that 17 one. 18 Q. So you took no action to investigate who Joe 19 Oltmann was? Am I understanding that correctly? 20 A. That's - that's - yeah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired, 26 wasn't political he would win entrepreneur of the year, 27 you didn't investigate any of those claims, did you? 28 A. I did not. 29 Q. Okay. So when you described yourself as a 29 guidance counselor to Mr. Clark, it doesn't apply with 29 mS. WEISS: Object to the form. 20 G. Okay. Let's skip ahead here to about the 21 three minute mark. 22 Q. Okay. Let's skip ahead here to about the 23 three minute mark. 24 (A video clip was played as follows:) 25 MR. OLTMANN: And as a person who followed 26 Jesus that could become an example for them. I 27 happened to get on a phone call with a guy named 28 Eric Coomer back in September of last year, and he 29 going to win. I made sure of that." 20 Q. Okay. I tim the charch of the Lord, so I'm not 21 going to win. I made sure of that." 22 Q. When you got a subpoena from Eric Coomer - 23 A. I flon't know what I the avail. But I am going to 24 tell you that I didn't know what I knew at that 25 point I didn't know what I knew at that 26 going to tell you what he said. But I am going to 27 tell you that I didn't know what I knew at that 28 point. I didn't know what I knew at that 29 going to tell you what he said. But I am going to 20 tell you that I didn't know what I knew at that 21 remember that. I'm not going to see and thell you that the sit of the minute minute mark. 29 MS. WEISS: Object to the form. 29 The minute charch of the Lord, so I'm not 29 Good of you a few minutes 29 A. I don't know what the exact basis of it is. I really don't. 20 Have you discussed the lawsuit with Mr. Clark? 21 A. I have the very gound to wi	12	Mr. Clark, will vet potential speakers from time to	12	(The playing of the video clip stopped.)
15 Tour? A. I don't recall if I ever got involved in that 16 you? One. 18 Q. So you took no action to investigate who Joe 18 not familiar with that story. 19 Oltmann was? Am I understanding that correctly? 19 Q. Is this the first time you heard Joe Oltmann 20 claim that he infiltrated an Antifa conference call with 21 remember doing anything like that. 21 remember doing anything like that. 22 Q. Do you know who did? 22 A. I don't. 23 A. I don't. 24 Q. So all these claims he's making here, that he 24 had hundreds of employees, that he could have retired, 25 had hundreds of employees, that he could have retired, 26 wasn't political he would win entrepreneur of the year, 3 you didn't investigate any of those claims, did you? 4 A. I did not. 4 A. I did not. 5 Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark, it doesn't apply with 7 respect to Mr. Oltmann's appearance on the Tour. Is 8 that fair? 4 MS. WEISS: Object to the form. 4 MS. WEISS: Object to the form. 5 MR. Okay. 11 Happened to get on a phone call with a guy named 18 Eric Coomer back in September of last year, and he said, "Hey, don't worry about it. Trump is not 20 going to tell you what he said. But I am going to tell you that I didn't know what I knew at that 24 Linking about? 12 Government with that story. 20 Linking the that story. 21 Linking the said and the first time you heard Joe Oltmann to that in flith that he filter that he first time you heard Joe Oltmann that he filer that he first time you heard Joe Oltmann Call with 1 and that he infiltrated an Antifa conference call with 21 call with 1 with 1 and that he infiltrated an Antifa conference call with 21 remember that. I more going to sit here and tell you that if he zirc Coomer? A. I really don't remember that. I don't remember that. I don't remember that. I don't remember that. I don't even remember him being on the stage. 2 Weight a bit with a guy and that I was in the addince even at that time. I remember that being - that one I was - I was walking Page 68  10 A.	13	time. What did you do to vet Mr. Oltmann before he came	13	BY MR. KLOEWER:
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17    One.   17    O.   No.   18    O.   O.   O.   O.   O.   O.   O.	15	Tour?	15	So you're familiar with this story, aren't
18 Q. So you took no action to investigate who Joe Oltmann was? Am I understanding that correctly? 19 Oltmann was? Am I understanding that correctly? 20 A. That's – that's – yeah. I mean, I don't 21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired, 26 had hundreds of employees, that he could have retired, 27 Page 66 1 that he was – that Ernst & Young told him that if he 2 wasn't political he would win entrepreneur of the year, 3 you didn't investigate any of those claims, idi you? 4 A. I did not. 5 Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark, it doesn't apply with 7 respect to Mr. Oltmann's appearance on the Tour. Is 8 that fair? 9 MS. WEISS: Object to the form. 10 THE WITNESS: That's fair. 11 BY MR. KLOEWER: 11 A. I don't know what the exact basis of it is. I 12 Q. Okay. Let's skip ahead here to about the 13 dree minute mark. 14 (A video clip was played as follows:) 15 MR. OLTMANN: And as a person who followed for going to win. I made sure of that." 16 Jesus that could become an example for them. I 17 happened to get on a phone call with a guy named 18 Eric Coomer back in September of last year, and he 19 said, "Hey, don't worry about it. Trump is not going to win. I made sure of that." 21 I'm in the church of the Lord, so I'm not going to tell you what he said. But I am going to 22 tell you that I didn't know what I knew at that 23 port fair it and a poing to tell you what he said. But I am going to 24 tell you that I didn't know what I knew at that 25 point I didn't know, I didn't know. I wrote it 26 down. I thought these guys were nuts. And then I 27  Jesus that could become an example for them. I 28  Jesus that could become an example for them. I 29  Jesus that could become an example for them. I 30  Jesus that could become an example for them. I 31  Jesus that could become an example for them. I 32  Jesus that could be come an example for	16	A. I don't recall if I ever got involved in that	16	you?
Oltmann was? Am I understanding that correctly?  A. That's that's - yeah. I mean, I don't  remember doing anything like that.  Q. Do you know who did?  A. I don't.  Q. So all these claims he's making here, that he  that he was - that Ernst & Young told him that if he  wasn't political he would win entrepreneur of the year, you didn't investigate any of those claims, did you?  A. I did not.  Q. Okay. So when you described yourself as a guidance counselor to Mr. Clark, it doesn't apply with respect to Mr. Oltmann's appearance on the Tour. Is that fair?  MS. WEISS: Object to the form.  THE WITNESS: That's fair.  BY MR. KLOEWER:  Q. Okay. Let's skip ahead here to about the lift there minute mark.  (A video clip was played as follows:)  MR. OLTMANN: And as a person who followed be said, "Hey, don't worry about it. Trump is not going to tell you what he said. But I am going to tell you that I didn't know at 1 knew at that point. I didn't know. I didn't know. I didn't know. I at latin't and what the saids of to tell you what I didn't know. I at latin't and what the point. I didn't know. I didn't know. I at latin't are limited that in the infiltrated an Antifa conference call with Eric Coomer?  A. I really don't remember that. I'm not going to sit here and tell you that I was in the audience even at that time. I remember that being - that one I was - I was walking Page 68  A. I really don't even remember him being on the stage.  Q. We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and  A. Okay.  A. I don't know what the exact basis of it is. I really don't.  Q. Have you discussed the lawsuit with Mr. Clark'?  A. I - I have. I ve talked talked to him about it his, you know yeah. I mean, I have spoken to him about it, but not in any kind of detail.  Q. He didn't tell you that the Tour had been sued. I didn't know it was about, you know, that I don't know how the how the details of Joel Oltmann was involved.  Q. When you got a subpoen	17	one.	17	A. I what Joe Oltmann is talking about? I'm
20 A. That's that's yeah. I mean, I don't remember doing anything like that. 21 Page 66 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 24 had hundreds of employees, that he could have retired. 25 Page 66 26 Page 66 27 Page 66 28 Page 66 29 Page 66 20 So all these claims he's making here, that he 24 had hundreds of employees, that he could have retired. 29 Page 68 20 Page 68 21 Page 66 22 Page 66 23 Page 66 24 Page 66 25 Page 66 26 Page 66 27 Page 66 28 Page 66 29 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 29 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 20 Page 68 21 Page 68 22 Page 68 23 Page 68 24 Page 66 25 Page 66 26 Page 66 26 Page 66 26 Page 66 27 Page 66 28 Page 68 29 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 20 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 20 Page 68 21 Page 68 22 Page 68 23 Page 68 24 Page 69 25 Page 68 26 Page 68 26 Page 68 27 Page 68 28 Page 68 29 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 20 Page 68 20 Page 68 21 Page 68 22 Page 68 23 Page 68 24 Page 68 25 Page 68 26 Page 68 26 Page 68 29 Page 68 20 We just watched a video of you a few minutes ago promoting a legal fundraiser for Clay Clark arising from this lawsuit, and 24 Page 68 29 Page 68 20 Page 68 20 Page 68 21 Page 68 21 Page 68 22 Page 68 24 Page 68 25 Page 68 26 Page 68 29 Page 68 20 Page 68 21 Page 68 22 Page 68 23 Page 68 24 Page 68 25 Page 68 26 Page 68 29 Page 68 20 Page 68 21 Page 68 22 Page 68	18	Q. So you took no action to investigate who Joe	18	not familiar with that story.
21 remember doing anything like that. 22 Q. Do you know who did? 23 A. I don't. 24 Q. So all these claims he's making here, that he 25 had hundreds of employees, that he could have retired. 26 Page 66  1 that he was — that Ernst & Young told him that if he 2 wasn't political he would win entrepreneur of the year, 3 you didn't investigate any of those claims, did you? 4 A. I did not. 5 Q. Okay. So when you described yourself as a 6 guidance counselor to Mr. Clark, it doesn't apply with 7 respect to Mr. Oltmann's appearance on the Tour. Is 8 that fair? 9 MS. WEISS: Object to the form. 10 THE WITNESS: That's fair. 11 BY MR. KLOEWER: 12 Q. Okay. Let's skip ahead here to about the 13 three minute mark. 14 (A video clip was played as follows:) 15 MR. OLTMANN: And as a person who followed 16 Jesus that could become an example for them. I 17 happened to get on a phone call with a guy named 18 Eric Coomer back in September of last year, and he 19 going to win. I made sure of that." 20 Q. We just watched a video of you a few minutes 21 A. Okay. 22 — you're telling me that you have no idea 23 what the basis of this lawsuit is? 24 A. I don't know what the exact basis of it is. I 25 remember that. I'm not going to it mean the audience even at that time. I 26 around quite a bit, so I don't even remember him being 27 on the stage. 28 Q. We just watched a video of you a few minutes 29 ago promoting a legal fundraiser for Clay Clark arising 29 from this lawsuit, and 30 Q. — you're telling me that you have no idea 31 what the basis of this lawsuit is? 32 A. I don't know what the exact basis of it is. I 33 really don't. 34 Q. Have you discussed the lawsuit with Mr. Clark? 35 A. I think he was that Four had been sued. 36 Park and the	19	Oltmann was? Am I understanding that correctly?	19	Q. Is this the first time you heard Joe Oltmann
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1	am aware of who he is, just in but I couldn't tell	1	don't think I I don't think I was in that audience
2	you what his job is or just the things that I have	2	when he was speaking. This is the first time I have
3	seen in podcasts and such and what I have read in the	3	heard that. I didn't know he was on a call with Coomer.
4	newspapers.	4	Q. He said he did his research. You never
5	Q. Well, what have you seen in podcasts about	5	attempted to find out what research he had done?
6	Eric Coomer?	6	A. No.
7	A. Just different different things that he has	7	Q. Let's skip ahead here to the 5 minute, 10
8	said, statements that he has made.	8	second mark.
9	Q. Like what?	9	(A video clip was played as follows:)
10	A. I don't know. I don't I don't recall what	10	MR. OLTMANN: Because I don't live my life in
11	those statements are, but I have you know, I have a	11	fear. Then I got sued by Eric Coomer. I found
12	memory of him, seeing him in a speaking to some	12	myself in the middle of a fight that was unfairly
13	group, and I just don't recall what it was that he said.	13	balanced. I've spent hundreds of thousand of
14	Q. Mr. Oltmann said that he took notes on this	14	dollars, I have lost millions of dollars.
15	call. Have you ever requested to see those notes?	15	(The playing of the video clip stopped.)
16	A. No.	16	BY MR. KLOEWER:
17	Q. Why not?	17	Q. Here Mr. Oltmann is stating on stage in his
18	A. The first time first time I heard that is	18	first appearance that he got sued by Eric Coomer. Do
19	right now.	19	you know what he got sued by Eric Coomer for?
20	Q. If Mr. Oltmann's story is true, that would be	20	A. No idea.
21	a pretty sensational piece of evidence, wouldn't it?	21	Q. You never read the lawsuit?
22	A. I mean, you are you are asking me to	22	A. Don't recall if I did.
23	speculate or what?	23	Q. And you didn't conduct any investigation, even
24	Q. Well, you wouldn't answer before if you	24	before this deposition, to find out what Eric Coomer had
25	believed that Dominion Voting Systems rigged the Page 70	25	sued Joe Oltmann for? Page 72
	Tage 70		Tuge 72
1	election or not, but if it were true that Eric Coomer	1	A. I did not.
2	had made these claims on a phone call, you would agree	2	Q. In your role as guidance counselor to Mr.
3	that that would be an important piece of evidence to	3	Clark, you never discussed with him putting people on
4	suggest that Dominion had rigged the election, correct?	4	stage to repeat claims that they had been sued for
5	MR. GREAVES: Object.	5	defamation over?
6	THE WITNESS: If that was the	6	A. I don't believe we ever have, no.
7	MR. GREAVES: Speculation.	7	Q. Does it concern you at all that the Tour is
8	THE WITNESS: Yeah, yeah. I mean, I think	8	putting speakers on stage who have been sued for making
9	either way	9	false statements?
10	Yeah. It is it's big-time speculation. I	10	A. I'm not sure what you're asking me. What are
11	mean, it's big-time. You know that. I mean, I	11	you asking me?
12	would be guessing.	12	Q. Well, it seems like
13	BY MR. KLOEWER:	13	If I understand your sworn testimony today,
14	Q. What's big-time speculation? Mr. Oltmann's	14	you are claiming that for the first time, as you sit
15	claims?	15	here, you are just becoming aware of claims about Eric
16	A. No. Your question.	16	Coomer, which you can probably discern I'm highly
17	Q. Well, you don't believe that Joe Oltmann was	17	skeptical of that claim. But knowing as you know now -
18	on this call with Eric Coomer, do you?	18	A. Well, which claims, Brad? Which claims? I
19	A. No idea.	19	mean, there's a lot of claims about a lot of people. So
20	Q. Why didn't you ever look into this?	20	which claims? You're making claims about
21	A. Why didn't I look into what? Whether Joel	21	Q. Claims that claims that Eric Coomer, the
22	Oltmann was on a phone call?	22	former director of strategy and security for Dominion
23	Q. Yeah.	23	Voting Systems, partook in an Antifa conference call;
24	A. This is probably the first time I heard it.	24	that he claimed on that call that he had rigged the 2020
25	And to be honest with you, this is the first time I I	25	election; and that he did, in fact, rig the 2020
1	Page 71		Page 73

1	election.	1	A. No.
2	A. Okay.	2	Q. What's your what's your role with The
3	Q. You don't have any reason to believe any of	3	America Project?
4	those claims, do you?	4	A. It was as an advisor.
5	A. Other than other than they we just heard	5	Q. Okay. And you know that Eric Coomer has sued
6	him state it a bit there on this. I don't. I mean, I	6	The America Project, don't you?
7	don't I only have I have no you know, I mean,	7	A. I don't recall, actually. I haven't been I
8	I'm not in a position where I don't know. I really	8	haven't been around The America Project for quite a
9	just don't know. I don't know what it is that you're	9	while.
10	asking me. I'm not sure where I'm not sure what	10	Q. Well, this wasn't the only time Mr. Oltmann
11	you're talking about.	11	made these claims on stage at the ReAwaken America Tour.
12	Are you asking me if I know Coomer? I don't	12	In fact, he did it many times over a prolonged period.
13	know Coomer. The job title you just gave him, that's	13	Let's take a look at an appearance that you
14	the first time I think I have heard him described like	14	also were at in Colorado Springs on September 25th of
15	that.	15	2021.
16	Joe Oltmann. I don't know him well.	16	We'll designate this as Exhibit 19, clip 3.
17	I think you said that this this video was	17	(A video clip was played as follows:)
18	2021, which probably would have been the third or fourth	18	MR. CLARK: All right. I'm telling you, we're
19	event that we had. So we were you know, we were	19	going to go from a level 9 to about a level 11.
20	people were joining the Tour, and so we probably, you	20	You're going to leave here, your head is going to
21	know	21	explode with knowledge you won't hear anywhere
22	I don't know. I'm not exactly sure what	22	else, so stay tuned.
23	you're asking me here. You're just you're sort of	23	Our next presenter is Colorado's very own tech
24	speculating about a bunch of things, and I'm not exactly	24	entrepreneur and freedom-loving patriot exposing
25	sure what you are asking me.	25	the corruption of election fraud. Ladies and
	Page 74		Page 76
1	Q. Beyond Mr. Oltmann's claims about this call,	1	gentleman, please stand and greet Joe Oltmann.
2	have you seen any evidence that this supposed call ever	2	(The playing of the video clip stopped.)
3	occurred?	3	BY MR. KLOEWER:
4	A. I haven't.	4	Q. Okay. Exposing the corruption of election
5	Q. Do you know how Mr. Oltmann got access to this	5	fraud. That's how Mr. Clark introduced him. What
6	call?	6	election fraud has Joe Oltmann exposed that you're aware
7	A. No idea.	7	of?
8	Q. Do you who else was on it?	8	A. No idea.
9	A. I have no knowledge of this call whatsoever.	9	Q. Do you know anything about Mr. Oltmann's
10	Q. Did you ever discuss Mr. Oltmann with your	10	background?
11	brother Joe?	11	A. I really don't.
12	A. I may have. I don't recall.	12	Q. Do you know if he has any credentials that
13	Q. You know Joe has been on Oltmann's podcasts a	13	any background in election technology?
14	few times, correct?	14	A. No idea.
15	A. I don't know. You know, if he has been on it,	15	Q. You don't know what kind of education he has?
16	that's that's you know, he has been on it. I I	16	A. I don't.
17	don't I can't sit here and tell you that he has or	17	Q. Do you know what kind of work he does?
18	has not. I just, you know. That's fine.	18	A. I am aware he is working with Mike Lindell. I
19	Q. Have you discussed Mr. Oltmann with Patrick	19	am aware of that.
20	Byrne?	20	Q. In what capacity?
21	A. I I may have. I don't recall, you know, if	21	A. I don't know what capacity I don't. I
22	we had, you know, lengthy conversations about him or any	22	don't really know what capacity.
23	conversations about him.	23	Q. Let's skip ahead to the eight-minute mark
24	Q. You're a board member on The America Project,	24	here.
25	correct?	25	(A video clip was played as follows:)
	Page 75		Page 77

1	MD OI TMANN, the (Insudible) from	1	A. I don't have one be ended as a fall of
1	MR. OLTMANN: the (Inaudible) from one	1	A. I don't have any knowledge of that.
2	either.	2	Q. Okay. And you heard Oltmann confidently
3	Here is what I know. Number 1, Eric Coomer	3	stating on stage that this is not hyperbole, that this
4 5	was on that call. Eric Coomer, who is the director of strategy and security for Dominion Voting	4	is truth.
5		5	A. I just heard in the video.
6	Systems, is a liar. I just sat in a deposition	6	Q. Yes.
7 8	with him where the guy literally lied about	7	A. I mean, whatever he just said in the video.
	everything. Dominion Voting Systems is a system	8	I'm not I can't sit here and tell you that I watched
9	just like others that's designed to steal your	9	him.
10	voice.  (The playing of the video alin stepped.)	10	Q. Do you have any reason to believe that Oltmann
11	(The playing of the video clip stopped.)	11	was on an Antifa conference call where he overheard Dr.
12	BY MR. KLOEWER:	12	Coomer speaking?
13	Q. Okay. Do you recall watching this	13	A. No idea.
14	presentation in real time, Mr. Flynn?	14	Q. And you already stated before that you were at
15	A. I don't.	15	every event, that you had been at every ReAwaken America
16	Q. Okay. But here we see Oltmann claiming again	16	event. So I presume that would include the event that
17	that Eric Coomer was on that call. He says, "Dominion	17	occurred in Dallas in December of 2021? Is that is
18	is a system designed to steal your voice."	18	that a fair assessment?
19	Do you agree with that assessment?	19	A. Okay. If it was a ReAwaken Tour, I was I
20	MR. GREAVES: Objection. I advise	20	was at it. If it was in Dallas and it was a ReAwaken
21	THE WITNESS: Right, right. I mean yeah.	21	Tour, I was at it.
22	BY MR. KLOEWER:	22	Q. Was that tour event the victim of an anthrax
23	Q. Do you agree with that assessment, that	23	attack?
24	Dominion is system designed to steal your voice?	24	A. Say that again?
25	A. I'm going to I'm going to assert my Fifth Page 78	25	Q. Did somebody attack that event with anthrax?  Page 80
1	Amendment right on this one.	1	A. Is that a serious question?
2	Q. Tape.	2	Q. Yes.
3	(A video clip was played as follows:)	3	A. I don't have any idea.
4	MR. OLTMANN: That's not hyperbole. That's	4	Q. You recall allegations that there was an
5	not me making stuff. That's truth. They say, Joe,	5	anthrax attack at that event, don't you?
6	you're you're advocating for violence. And I'll	6	A. I recall at one event somebody claimed about
7	tell you this. When is enough going to be enough?	7	some you know, the air conditioning system was doing
8	When are you going to keep moving that line back?	8	something, you know. But it was I think just the
9	Until it kills you? Until they come for your	9	humidifier or something. So I remember that. I don't
10	children?	10	know whether that was in Dallas or what. But
11	(The playing of the video clip stopped.)	11	Q. Do you recall who made that claim?
12	BY MR. KLOEWER:	12	A. I don't.
13	Q. You're familiar with Mr. Oltmann's frequent	13	Q. You don't remember Joe Oltmann claiming that
14	calls for violence, aren't you, Mr. Flynn?	14	he and Jovan Pulitzer had been attacked by anthrax at
15	MS. WEISS: Object to form.	15	the Dallas event?
16	THE WITNESS: I am not. Yeah. I'm not. I'm	16	A. I don't remember that, no.
17	not.	17	Q. Okay. Is Jovan Pulitzer a speaker on the
18	BY MR. KLOEWER:	18	ReAwaken America Tour events?
19	Q. You never discussed Mr. Oltmann's Public	19	A. He has been, yes.
20	statements with Patrick Byrne?	20	Q. I can I can discern from your skepticism by
21	A. I don't believe I have.	21	my question that you take the premise that the event was
22	Q. Are you aware that Mr. Byrne has published	22	attacked by anthrax to be unreasonable, to put it
23	multiple statements stating that every conversation he	23	gently. Is that fair?
24	has ever been in with Joe Oltmann, he's advocating for	24	A. I I think that your question is not very
25	violence?	25	clear.
	Page 79		Page 81

1	Q. Well, what I'm	1	the tape and I'll ask you a few questions about that.
2	A. Your statement. Your statement is not very	2	(A video clip was played as follows:)
3	clear.	3	MR. OLTMANN: So he goes, first of all, the
4	Q. After after Mr. Oltmann claimed that the	4	insurance I have spent \$390,000 on legal fees
5	event had been the victim of an anthrax attack and that	5	with the Eric Coomer case. Now, so since I know
6	he and Mr. Pulitzer may have been poisoned with anthrax,	6	what it cost to actually go through that case,
7	did that give you concerns about his credibility?	7	\$390,000 seems like an exorbitant amount for his
8	A. I don't remember that. I don't recall that.	8	small part of this. But, you know, neither here
9	Q. You didn't discuss with Mr. Clark allegations	9	nor there. Maybe it's true. I hope it's not true,
10	that the event had been attacked by anthrax, by a	10	because that just means that lawyers are literally
11	chemical agent?	11	making a bunch of money and trying to bilk him dry.
12	A. If we did, we were we probably laughed	12	But then he says that the insurance company
13	about it, because anthrax is a very serious, you know.	13	that he's dealing with will not cover the event if
14	It's a very serious thing, and if it was, we would know	14	Joe Oltmann speaks. So if Joe Oltmann gets on the
15	about it. Everybody. The world would have known about	15	stage and speaks, we will not cover the event.
16	it.	16	And I went, Oh, all right. Okay. Nobody has
17	Q. So you would agree that somebody that would	17	ever paid me to go to an event. I paid my expenses
18	make that allegation that lightly is not somebody that	18	on I think, what, five percent of the occasions.
19	you would consider to be reliable.	19	A SPEAKER: Yeah, yeah, about that.
20	A. I had no no I don't know how to answer	20	MR. OLTMANN: And otherwise, I go out there
21	that question. I mean, I would just say I don't have	21	because I really want people to understand what the
22	any real knowledge about his that claim and, you	22	truth is, right? So.
23	know, nor nor what resulted from it.	23	And by the way, I don't really give a shit
24	Q. Does Joe Oltmann still appear with the	24	about your \$390,000 in legal fees. I really don't,
25	ReAwaken America Tour?	25	but
	Page 82		Page 84
1	A I don't believe he has in a while that I'm	1	(The playing of the video clip stopped)
1 2	A. I don't believe he has in a while that I'm aware of	1 2	(The playing of the video clip stopped.) BY MR. KLOEWER:
2	aware of.	2	BY MR. KLOEWER:
2 3	aware of. Q. Why not?	2 3	BY MR. KLOEWER: Q. Okay. So does that refresh your recollection?
2 3 4	aware of. Q. Why not? A. No idea.	2 3 4	BY MR. KLOEWER:  Q. Okay. So does that refresh your recollection?  Do you remember talking to Mr. Clark about removing
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		1	Enia Carman VIII amerika at a a Barria VIII
1	here.	1	Eric Coomer, VP security strategy, Dominion Voting
2	And, Nate, I apologize. I believe I'm at	2	Systems. Here is the link."
3	Exhibit 21. And hopefully it will be the last time I	3	And the link we can see is a Facebook link, it
4	get out of order but I believe that's where we're at.	4	goes to the right, Michelle Malkin. Do you know who
5	(Exhibit 21, E-mail chain ending 11/14/2020	5	Michelle Malkin is?
6	from Mike Flynn to Joshua Steinman, et al., was	6	A. I do. Yeah, I do know who she is.
7	marked for identification.)	7	Q. Do you know Ms. Malkin personally?
8	BY MR. KLOEWER:	8	A. No.
9	Q. So I'm going to show you what we'll mark as	9	Q. Did you watch this clip when it was forwarded
10	Exhibit 21. And these are documents that you produced	10	to you by Ms. Powell?
11	pursuant to a subpoena. So let's take a look at what's	11	A. No idea.
12	been marked as MTF000011.	12	Q. You don't recall watching an interview between
13	I'm going to share my screen here.	13	Michelle Malkin and Joe Oltmann?
14	Okay. Do you see this document on my screen?	14	A. I don't recall.
15	A. I do. I can see it.	15	Q. Yeah. The e-mail states, "At 21 minutes of
16	Q. At the top of the page it's indicated as an	16	this video Joe Oltmann discusses Eric Coomer's threats
17	e-mail from zulutym@gmail.com and it includes your name	17	against President Trump."
18	in the quotation marks. Is that zulutym@gmail, is that	18	Does this did you read this e-mail at the
19	an e-mail that you use?	19	time you received it?
20	A. Yes.	20	A. I don't recall.
21	Q. What do you use that e-mail address for?	21	Q. If you saw an e-mail about somebody making
22	A. Just I've had it for a long time, I just I	22	threats against President Trump, would that concern you
23	use it for a lot of things. E-mail.	23	A. It would.
24	Q. Is it a personal e-mail address or is it	24	Q. Okay. The next line states, "Eric Coomer may
25	A. Personal.  Page 86	25	hold the key to the entire election theft by Dominion.  Page 88
1	Q. Okay. As is typically the case with these	1	Eric Coomer should be arrested immediately."
2	sort of documents, the correspondence begins at the	2	What did you understand this to mean when you
3	bottom, and we see it, how it proceeds moving forward.	3	received this e-mail?
4	So I'm scrolling down to the lower portion of that	4	A. I don't recall what I understood at the time.
5	document. This indicates an e-mail from an individual	5	Q. Well, let's put this e-mail in the in the
6	named Jerry Waller to Info@SidneyPowell.com, and the		appropriate time frame. This is November 14th, 2020.
7	date indicated here is Saturday, November 14th, 2020.	7	It's about a week after the election was called for Joe
8	Do you see that?	8	Biden. At that time you didn't believe that Joe Biden
9	A. I can.	9	won the election, did you?
10	Q. And the subject line is, "Eric Coomer.	10	MR. GREAVES: Objection. I'm going to ask my
11	Dominion"?	11	client to assert his Fifth Amendment rights, or
12	A. Okay.	12	advise him to do so.
13	Q. Who is Jerry Waller?	13	THE WITNESS: Uh-huh (Affirmative response).
14	A. No idea.	14	MR. KLOEWER: I'll just have a standing
15	Q. Okay. But you know who Sidney Powell is,	15	response that we don't believe these objections are
16	obviously?	16	proper under Rule 30.
17	A. I do.	17	MR. GREAVES: I understand.
18	Q. And who is Sidney Powell?	18	BY MR. KLOEWER:
19	A. She was an attorney of mine.	19	Q. At this time, you were actively looking into
20		20	
	Q. Is she still representing you?		claims that the election had been rigged, weren't you,
21	A. No.	21	Mr. Flynn?
22	Q. So this is an e-mail. It appears it was sent	22	MR. GREAVES: Objection.
23	to Ms. Powell. And I'll read the subject. It appears	23	THE WITNESS: I was yeah.
24	to be that this is what Mr. Waller wrote down here.	24	MR. GREAVES: I'm advising my client to assert
25	It says, "Massive information was given about Page 87	25	his Fifth Amendment rights. Page 89
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Q. And here we have an e-mail stating that a top 3 executive at Dominion may be the key to the theft and be 4 should be arrested immediately. And Sidney Powell sent 5 this e-mail to you. 6 Do you know why she sent that to you? 7 A. Does it say it on there? 8 Q. Well, well scroll right up here. So yes. If 9 we see the time stamp on the e-mail for Mr. Waller, it's 10 11:37 a.m. on November 14th. We scroll up here at 11:23 a.m. on November 14th. We scroll up here at 12 cash, so less than an hour later Sidney Powell forwards 13 Do you know why she was sending this 14 information to you? 15 A. Idon't. I don't recall. 16 Q. Who is Josh? 17 A. Can you go up to the top? Josh Steinman, Josh 18 Steinman. I think at the time Josh was still in the 18 While House responsible for cyber security. 20 Q. So he was a White House official. Put I think hisI thon't think hisI think hisI think hisI think hisI thon't think hisI think hisI think hisI think hisI thi	1	BY MR. KLOEWER:	1	you are just forwarding e-mails from Sidney Powell to
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White House responsible for cyber security.  Q. So he was a White House official. Tell me if this I think his I think his I don't think I wouldn't say White House official, but I think he was on the he was somewhere in the National Security Council.  Page 90  1 Q. If I told you that he was the senior director for cyber policy and deputy assistant to the president; would you disagree with that?  A. I would not. Q. Okay. So he was a high-ranking government official at the time. Is that fair? A. Okay. Q. You would agree with that assessment, that he Q. So why did you send Mr. Steinman this information? A. I think because Sidney asked me to. Q. You didn't review the information that she had asked you to forward to this government official? A. I don't recall if I did. Q. Did you why didn't Sidney Powell reach out to Mr. Steinman herself? A. She may not have had the ability. I don't to Mr. Steinman herself? A. I don't recall if you sent him information? A. She may not have had the ability. I don't to Mr. Steinman herself? A. She may not have had the ability. I don't to Mr. Steinman herself? A. She may not have had the ability. I don't to Mr. Steinman herself? A. I don't recall if lon't to Mr. Steinman herself? A. I am. I am infrequent. I am. Q. If Ms. Powell sent you a chain letter saying if you don't send this to 15 people you will be cursed, send it to Josh right away, would you have done that?  What I'm trying to understand helt to him the head the president;  MR. GREAVES: Objection. Is there a question?  I'm trying to understand I'm trying to understand helt ime. So you don't have any recollection of investigating whether this claim was true when you received this e-mail?  A. I don't recall if he did or not.  Q. What is your relationship with Mr. Steinman?  A. I ve known him for a number of years, and I hired him on the National Security Council.  D. D.				•
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to Mr. Steinman herself?  A. She may not have had the ability. I don't  know. You'd have to ask her.  Q. If Ms. Powell sent you a chain letter saying if you don't send this to 15 people you will be cursed, send it to Josh right away, would you have done that?  Whether or not he reviewed it or not, I don't know.  Q. Are you still in touch with him?  A. I am. I am infrequent. I am.  Q. How frequently would you say you're in touch with Mr. Steinman today?  A. Once a year.  What I'm trying to understand, Mr. Flynn, is,  Q. Did he follow-up on this e-mail with you?				
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Page 91	25	What I'm trying to understand, Mr. Flynn, is, Page 91	25	Q. Did he follow-up on this e-mail with you?  Page 93

16 she was doing.  Q. Why were you working with Sidney Powell on these — these issues?  18 A. Why was I working with her?  Q. Yes.  20 Q. Yes.  21 A. Why was I helping Sidney Powell?  22 Q. Yeah.  23 A. Because she helped me.  24 Q. How did she help you?  25 A. Now, Jason, I mean, how ridiculous are we Page 94  1 going to get here?  2 MR. GREAVES: You can answer that question.  3 THE WITNESS: I mean, she helped me by — by dollowing through and determining how much the Department of Justice was undermining me — okay — illegally persecuting me.  4 Q. She was working to get you a pardon from President Trump at this time, wasn't she?  A. No, no, no, no, no, o. She — my case had already been dismissed, so don't — don't jump to that.  Q. Well, your pardon hadn't been issued?  MR. GREAVES: Hold on.  THE WITNESS: I don't know. Yeah. Go ahead, go ahead.  MR. GREAVES: Just for the record, I'm going to object to any questions that ask for the work of the population of the record, I'm going attorney-client confidential communications.  24 Well, Woult hat be Timothy Batten, Chief United attorney-client confidential communications.  25 A. My was I helping Sidney Powell?  26 Q. Yes.  27 (Exhibit 22. E-mail 12/1/2020 from Ben Sheva to Mike Flynn, et al., was marked for identification.)  28 BY MR. KLOEWER:  29 Q. Can you see this document, Mr. Flynn?  A. From Ben Sheva. Is that what this says? It's an e-mail.  40 Q. Yes, that's correct. It's dated December 1st, 2020, at the top?  A. Okay.  41 Q. Who is Ben Sheva?  A. I don't know.  42 Q. Who is Ben Sheva?  A. I don't know.  43 A. I don't know.  44 I stays, "Sir, even if Batten will allow forensic examination of servers, the Eleventh Circuit will overrule his decision. Ms. Powell should immediately present testimony of 305 officer and request in the population of servers, the Eleventh Circuit will overrule his decision. Ms. Powell should immediately present testimony of 305 officer and request in the population of servers, the Eleventh Circuit will overrule his decision. Ms. Pow				
A. I ve answered that a couple times.  Q. What was – what did you think Mr. Steinman would dow with this information?  A. I guess at the time – I guessed that he would look into it.  Q. And you never followed up with him to see if he had looked into it?  A. I don't recall if I did.  Q. Because you didn't believe that Eric Coomer actually had rigged the election, did you?  A. I amean, I – I have no knowledge of that, and definitely not at the time. I just – you know, I was helping out Sidney in her – in the set of cases that she was doing.  Q. Why were you working with him to see if he helped me by – by and the work of the partnern of Justice was undermining me – okay – and how much the Department of Justice was undermining how much the Department of Justice was undermining me — okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was undermining me – okay – and how much the Department of Justice was – was illegally persecuting me.  By MR. KLOEWER:  A. My pardon hadn't yet been issued, had it?  A. Mo, no, no, no, no, no. See – my case had already been dismissed, so don't – don't jump to that.  G. Well, your pardon hadn't yet been issued, had it?  A. My pardon hadn't been issued?  MR. GREAVES: No, I don't know, Yeah. Go ahead, go ahead.  MR. GREAVES: Hold on.  THE WITNESS: Lakady.  MR. GREAVES: And hold on, General Flym.			1	•
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A. I mean, I — I have no knowledge of that, and definitely not at the time. I just — you know, I was beliping out Sidney in her — in the set of cases that she was doing.  Q. Why were you working with Sidney Powell on these — these issues?  A. Why was I working with her?  Q. Yes.  Q. Yeah.  A. Because she helped me.  Q. How did she help you?  A. Now, Jason, I mean, how ridiculous are we Page 94  I going to get here?  MR. GREAVES: You can answer that question.  THE WITNESS: I mean, she helped me by — by and how much the Department of Justice was — was illegally persecuting me.  BY MR. KLOEWER:  Q. Well, your pardon hadn't yet been issued, had it?  A. My pardon hadn't been issued?  MR. GREAVES: Just for the record, I'm going to object to any questions that ask for attorney—clark in the company of the Northern District of attorney—clark in Justice was — was go ahead.  MR. GREAVES: Just for the record, I'm going to object to any questions that ask for attorney—clark in Justice was — was go ahead.  MR. GREAVES: Just for the record, I'm going to object to any questions that ask for attorney—clark in Justice was — was go ahead.  MR. GREAVES: Just for the record, I'm going to object to any questions that ask for attorney—clerk in Company of the Northern District of attorney—clerk in Company of the Northern District of States District Judge for the Northern District of S				-
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8 BY MR. KLOEWER: 9 Q. She was working to get you a pardon from 10 President Trump at this time, wasn't she? 11 A. No, no, no, no, no. She my case had 11 It says, "Sir, even if Batten will allow 12 already been dismissed, so don't don't jump to that. 13 Q. Well, your pardon hadn't yet been issued, had 14 it? 15 A. My pardon hadn't been issued? 16 MR. GREAVES: I'm going to object 17 THE WITNESS: No, I don't know, I mean 18 MR. GREAVES: Hold on. 19 MR. GREAVES: Just for the record, I'm going 20 go ahead. 21 MR. GREAVES: Just for the record, I'm going 22 to object to any questions that ask for 23 attorney-client confidential communications. 24 THE WITNESS: Exactly. 25 MR. GREAVES: And hold on, General Flynn. 26 A. I don't know. 27 A. I don't know. 28 A. I don't know. 29 Q. Okay. Well, let's take a look at the e-mail and see if it rings any bells.  10 and see if it rings any bells.  11 It says, "Sir, even if Batten will allow 12 it rings any bells.  12 and see if it rings any bells.  13 will overrule his decision. Ms. Powell should 14 immediately present testimony of 305 officer and request 15 FBI and GBI to do the job before servers are wiped out." 16 Is this refreshing your recollection? Do you 17 have any idea who Mr. Sheva could be? 18 A. No, I don't. I don't recall it. I don't 19 recall that e-mail. 20 Q. Who is Batten? 21 A. I don't know. I don't remember. 22 Q. Would that be Timothy Batten, Chief United 23 States District Judge for the Northern District of 24 Georgia? 25 A. I mean, I don't know.	6	and how much the Department of Justice was was	6	A. Okay.
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23 attorney-client confidential communications. 23 States District Judge for the Northern District of 24 Georgia? 25 MR. GREAVES: And hold on, General Flynn. 25 A. I mean, I don't know.				
24 THE WITNESS: Exactly. 24 Georgia? 25 MR. GREAVES: And hold on, General Flynn. 25 A. I mean, I don't know.	23			·
25 MR. GREAVES: And hold on, General Flynn. 25 A. I mean, I don't know.	24			
	25	-		-

1	Q. So you don't know who Mr. Sheva is. Do you	1	A. Which one am I using? My Resilient Patriot?
2	know why he's stating with such confidence that the	2	Q. Yes.
3	Eleventh Circuit would overrule an order from Judge	3	MR. GREAVES: Objection to form. Go ahead,
4	Batten?	4	sir.
5	A. I don't recall, no.	5	THE WITNESS: It's just it's just another
6	Q. "She should also add such a request in her	6	e-mail address.
7	legal filings with Batten. Nobody can argue that FBI	7	BY MR. KLOEWER:
8	and GBI forensics can compromise Dominion's 'security	8	Q. Is that another personal e-mail address?
9	and proprietary trade secret risks to defendants."	9	A. Uh-huh (Affirmative response).
10	This e-mail was part of you and Ms. Powell's	10	Q. And Ms. Powell says, "Please print," with two
11	joint efforts to get access to Dominion voting machines,	11	exclamation points. And this is a forward from somebody
12	correct?	12	named Christos Makridis, I believe. M-A-K-R-I-D-I-S.
13	MR. GREAVES: Objection. And I'm	13	Who is Christos Makridis?
14	instructing advising my client to assert his	14	A. Don't know. Don't recall.
15	Fifth Amendment privilege.	15	Q. He says, "Here we go. The SSL certificate
16	THE WITNESS: Yeah. And I will, under advice	16	linking Dominion with Venezuela and the ownership
17	of my attorney, I'm going to assert the Fifth.	17	interest of China in Dominion through Staple Street."
18	BY MR. KLOEWER:	18	Now, here is a question I have for you, Mr.
19	Q. This e-mail says, "Ms. Powell should	19	Flynn, because I don't fully understand the documents
20	immediately present testimony of 305 officer."	20	you've produced. So this is the e-mail Bates labeled
21	Do you know what this 305 officer refers to?	21	page 94. The next page, 95, is what appears to be some
22	A. I don't.	22	sort of draft affidavit. It's not filled in.
23	Q. Do you recall Ms. Powell working with somebody	23	Declaration of name, redacted.
24	by the name of Joshua Merritt?	24	Paragraph 2 here states, "I was an electronic
25	A. I don't recall.	25	intelligence analyst under 305th Military Intelligence
	Page 98		Page 100
1	Q. Do you know Josh Merritt?	1	with experience through SAM surface to air missile
2	A. I don't know. I don't recognize that name.	2	system electronic intelligence."
3	Q. You don't recall an individual who went by the	3	Do you recall can you tell me what document
4	pseudonym Spyder and filed affidavits for Ms. Powell?	4	I'm looking at here? And again
5	A. I don't. I don't recall.	5	A. I don't
6	Q. Well, I'll represent to you that it was widely	6	Q it's your production, so
7	reported at the time, and has since been widely	7	MR. GREAVES: I might be able to help you out
8	reported, that an individual by the name of Josh Merritt	8	here, Brad. The way that these were produced is
9	purported to be an officer, a 305 officer.	9	that the sequential numbers of these documents, if
10	Let me show you the next document here. Let's	10	there was an attachment to an e-mail, the e-mail
11	take a look at MTF0094. We will designate it as Exhibit	11	attachment comes next in the sequence. So what you
12	23.	12	are looking at is 94. If you look at that, there's
13	A. Uh-huh (Affirmative response).	13	an attachment there under the subject line. And so
14	(Exhibit 23, E-mail string ending 12/12/2020	14	the next pages are the actual PDF document that was
15	from Sidney Powell to Regis Giles, et al., was	15	attached to that e-mail.
16	marked for identification.)	16	MR. KLOEWER: All right. Then I thank you
17			C 41.4
17	BY MR. KLOEWER:	17	for that.
18	BY MR. KLOEWER:  Q. Again, Mr. Flynn, this is a document from your	17 18	BY MR. KLOEWER:
			BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm
18	Q. Again, Mr. Flynn, this is a document from your	18	BY MR. KLOEWER:
18 19	Q. Again, Mr. Flynn, this is a document from your production from Sidney Powell to Regis Giles and Flynn	18 19	BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm
18 19 20	Q. Again, Mr. Flynn, this is a document from your production from Sidney Powell to Regis Giles and Flynn at ResilientPatriot.com. This is December 12th, so	18 19 20	BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm assuming that the first document here is Andy_Huang
18 19 20 21	Q. Again, Mr. Flynn, this is a document from your production from Sidney Powell to Regis Giles and Flynn at ResilientPatriot.com. This is December 12th, so about 11 days later. Who is Regis Giles?	18 19 20 21	BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm assuming that the first document here is Andy_Huang H-U-A-N-Gaffidavit.pdf. Do you recall reviewing
18 19 20 21 22	Q. Again, Mr. Flynn, this is a document from your production from Sidney Powell to Regis Giles and Flynn at ResilientPatriot.com. This is December 12th, so about 11 days later. Who is Regis Giles?  A. I don't remember, actually.	18 19 20 21 22	BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm assuming that the first document here is Andy_Huang H-U-A-N-Gaffidavit.pdf. Do you recall reviewing this, this PDF at the time, Mr. Flynn?
18 19 20 21 22 23	<ul> <li>Q. Again, Mr. Flynn, this is a document from your production from Sidney Powell to Regis Giles and Flynn at ResilientPatriot.com. This is December 12th, so about 11 days later. Who is Regis Giles?</li> <li>A. I don't remember, actually.</li> <li>Q. You are using a different e-mail address here.</li> </ul>	18 19 20 21 22 23	BY MR. KLOEWER:  Q. Then my assumption is correct, that I'm assuming that the first document here is Andy_Huang H-U-A-N-Gaffidavit.pdf. Do you recall reviewing this, this PDF at the time, Mr. Flynn?  A. I don't.

1	A. I don't.	1	Q. What about Todd Sanders?
2	Q. Do you deny that that individual was Josh	2	A. I don't recall if I did. I mean, 2019 is a
3	Merritt?	3	different time.
4	A. Do I deny that it was Josh Merritt?	4	Q. You don't recall going with Ms. Powell to an
5	Q. Yeah. Do you have a reason to deny it?	5	airfield in Addison, Texas, where ASOG had an office
6	A. I have no no reason to not know who it is.	6	on
7	I mean, I don't know I don't no, I guess not.	7	A. I don't believe I don't recall that I did
8	Q. And you knew that Josh Merritt was working	8	that, no. Uh-uh. (Indicates negatively).
9	with the organization called the Allied Security	9	Q. You don't recall seeing a presentation from
10	Operations Group at the time, correct?	10	them suggesting that elections may be manipulated
11	A. I don't know that. I don't recall if I did.	11	through electronic technology?
12	Q. What is the Allied Security Operations Group?	12	A. I saw presentations, but I don't believe I
13	A. I vaguely remember the group of one of	13	ever went to that place.
14	the one of the guys was a former military guy. Phil,	14	Q. What do you mean by that? You saw
15	I think is his name. And I forget the gentleman's name	15	presentations from ASOG?
16	that was the	16	A. You know, PowerPoint presentations that
17	Q. Phil Waldron?	17	they that they had.
18	A. Phil Waldron. That's an ego. He was part of	18	Q. When did you see those PowerPoint
19	it, and there was a couple other people.	19	presentations?
20	Q. And you've known Phil Waldron for some time,	20	A. It would have been in the 2020 time frame,
21	haven't you?	21	maybe. Late 2020 time frame.
22	A. I know him. Yeah, I knew him, you know, I	22	Q. And who was the individual presenting those?
23	knew him but not necessarily I mean, our paths may	23	A. No idea. I don't have any recollection other
24	have crossed in the military, but they definitely we	24	than just I vaguely remember, you know, the some
25	definitely worked you know, we were working together	25	presentations.
	Page 102		Page 104
1	at this time.	1	Q. Was it Phil Waldron?
2	Q. When you say your paths crossed in the	2	A. I don't recall. It's been too long.
3	military, what do you mean by that?	3	Q. Do you have reason to deny that it was Phil
4	A. We probably served on the same battlefield.	4	Waldron?
5	Q. Which battlefield?	5	A. No idea.
6	A. Iraq, Afghanistan.	6	Q. Okay. The same question for Josh Merritt. Do
7	Q. And did you work in the same unit?	7	you have any reason to deny that Josh Merritt was giving
8	A. I don't recall if we did.	8	you presentations of ASOG information in late 2020?
9	Q. How about Russ Ramsland? You know	9	A. I don't remember. I don't think I I'm not
10	Mr. Ramsland, don't you?	10	sure I've ever met him, or I don't recall meeting him.
11	A. I have met Russ. Yes, I do know who he is.	11	Q. Well, at this time in early December of
12	Q. How do you know Russ Ramsland?	12	2020 and I'm not hiding the ball here. I'll cut to
13	A. Just through this, you know, from this period	13	the chase. If we scroll down through this affidavit,
14	of time.	14	this also, if we scroll down to page 115 of your
15	Q. Did you know Mr. Ramsland prior to the 2020	15	production
16	election?	16	A. Why do you say this is my production?
17	A. I don't believe I did.	17	Q. We subpoenaed you for documents
18	Q. You never visited the ASOG hanger in Addison,	18	A. Oh. I see. I see. My production for this
19	Texas?	19	case. I gotcha. Because you're
20	A. I have not. I don't believe I have.	20	Q. Yes. I apologize. That's some lawyer speak
21	Q. Did you go with Ms. Powell to see a	21	that is may not be clear. This is what your counsel
22	presentation from ASOG in 2019?	22	produced to us.
23	A. In 2019?	23	A. Yeah. I gotcha.
24	Q. Yes.	24	Q. I'm asking, because included with this
25	A. No, I don't believe I did.	25	affidavit are multiple references to Eric Coomer.
	Page 103		Page 105

		1	
1	A. Okay.	1	a couple that I remember there.
2	Q. For example, on page 115 we see that Eric	2	Q. Who is Mr. Keshel?
3	Coomer is one of the inventors of Dominion Voting	3	A. Seth is a young young guy who who has
4	security features.	4	been involved in in election analysis.
5	Were you aware that Dr. Coomer had contributed	5	Q. Did you serve with Mr. Keshel as well?
6	to patents owned by Dominion Voting Systems?	6	A. Well, we served in the military at the same
7	A. I don't recall if I was.	7	time, roughly the same time.
8	Q. Did you conduct any investigation into Eric	8	Q. What about Jim Penrose? Was he there?
9	Coomer's role with Dominion Voting Systems at the time?	9	A. Jim Penrose was there, yes.
10	A. I don't believe I don't recall. I don't	10	Q. Who is Jim Penrose?
11	believe I conducted any investigation, you know, to	11	A. Jim is another smart, you know, technically
12	answer your specific question.	12	gifted person. And he was there helping out with some
13	Q. Do you know anything about what Dr. Coomer's	13	of the some of the you know, some of the technical
14	role was with Dominion Voting Systems?	14	questions.
15	A. I don't recall.	15	Q. Was Conan Hayes there?
16	Q. On the next page of this document, forwarded	16	A. You know, I don't I don't recall if he was
17	by the 305th officer, we see again another reference	17	there.
18	saying Eric Coomer is one of the inventors of Dominion	18	Q. But you
19	Voting security features.	19	A. I don't recall if he was there.
20	MR. GREAVES: Objection to form.	20	Q. But you know Conan Hayes?
21	BY MR. KLOEWER:	21	A. I do.
22	Q. At this time in early December of 2020, you	22	Q. How do you know Mr. Hayes?
23	were working with Ms. Powell at the at the at Lin	23	A. He's a world class surfer.
24	Wood's property that's Tomotley Ranch in South Carolina,	24	Q. Is that how you met him?
25	correct?	25	A. No. That's how I knew about him.
	Page 106		Page 108
1	A. There was a period that we were down there,	1	Q. Okay. Why was he involved with these efforts
2	yes.	2	at Tomotley?
3	Q. Okay.	3	A. He is, I believe I don't know whether he is
4	A. I don't remember the exact time frame but	4	trained or not, but he's a gifted cyber security type
5	Q. Yeah.	5	analyst.
6	A. Yeah.	6	Q. And he was working with the Allied Security
7	Q. Who all was working with you at Tomotley?	7	Operations Group at the time, correct?
8	A. A group of I don't know, a couple of	8	A. No idea.
9	lawyers. Sidney and and another young lady.	9	Q. Do you know anything about do you have any
10	Q. Is that Abigail Frye?	10	knowledge about Mr. Hayes's credentials with respect to
11	A. Yes, Abbie Frye, yeah.	11	his forensic background in computer forensics?
12	Q. Was Katherine Friess there?	12	A. I don't.
13	A. Who?	13	Q. So you're not aware if he has any specific or
14	Q. Katherine Friess, F-R-I-E-S-S?	14	unique training in that field?
15	A. That name doesn't ring a bell.	15	A. I I don't recall if I if I was ever
16	Q. Okay.	16	briefed on it. I don't, no.
17	A. There was people that came in and out of	17	Q. And Doug Logan was also at Tomotley during
18	there.	18	this time frame, correct?
19	Q. Patrick Byrne was there, correct?	19	A. Yes. Doug Logan was another one there.
20	A. Not at the same time. I mean, we we	20	Q. Who is Doug Logan?
21	crossed paths, but we I don't think we were ever at	21	A. Doug is another cyber security analyst and was
22	that at his home together.	22	helping out with technical questions and issues.
23	Q. Who else was at Tomotley at that time?	23	Q. And he went on to work with an entity called
24	A. I'm thinking who else. Boy. Racking my brain	24	Cyber Ninjas; is that correct?
25	here, Seth Keshel and his wife Carissa, I think. That's	25	A. I believe that was his company. Actually, I
	Page 107		Page 109

1	think, if I remember right, that's you're racking my	1	A. I don't recall.
2	brain here, but I think that was his company. Cyber	2	Q. And did you ever discuss with Ms. Powell who
3	Ninjas.	3	her sources were that were providing her with the
4	Q. Are you still in touch with Mr. Logan?	4	affidavits for her lawsuits at the time?
5	A. I am not.	5	A. I I don't. But I was represented, you
6	Q. When was the last time you spoke with him?	6	know, so Sidney was still representing me at the time,
7	A. Maybe two years ago.	7	so I want to be careful that I am not crossing the line
8	Q. Okay.	8	here, Jason.
9	A. It's been a while.	9	MR. GREAVES: Right.
10	Q. And did Joe Oltmann visit Tomotley at this	10	BY MR. KLOEWER:
11	time frame as well?	11	Q. So just so I'm clear on that so we don't cross
12	A. I don't recall if he did.	12	that line, what matters was Ms. Powell representing you
13	Q. Do you have any reason to deny that he came to	13	with respect to at that time?
14	Tomotley in late 2020?	14	A. I mean, just as a lawyer. She was a legal
15	A. I don't, no.	15	she was my lawyer at the time.
16	MR. KLOEWER: Okay. I think it's probably	16	Q. Well, but you hadn't retained her to advise
17	time everybody would appreciate a lunch break. We	17	you on matters related to the election, correct?
18	can break here and hop back in. Does that does	18	A. I did not.
19	that work, if we all hop off the record here for	19	Q. And we've seen various e-mails that she had
20	I don't know. It's 10:37 my time, 12:37 your time.	20	sent to you, you know, asking you to forward things on
21	So if we hop back on the record, say, 1:30 Eastern,	21	to higher-ups and different offices as well during that
22	does that work for everybody?	22	time frame that were not subject to that privilege.
23	MR. GREAVES: Works for me.	23	So
24	MR. KLOEWER: Fifty minutes for lunch. Okay.	24	MR. GREAVES: Form.
25	So let's hop off the record then, and we will get	25	BY MR. KLOEWER:
	Page 110		Page 112
1	back on at 1:30 Eastern Time.	1	Q was she just representing you with respect
2	THE VIDEOGRAPHER: Please stand by. The time	2	to your appeal of the criminal case?
3	now is 12:37. We are going off the record, and	3	A. I mean, there was no appeal.
4	this is the end of Media Unit 2.	4	Q. But your retainer agreement with her was
5	(A recess was had)	5	specifically with respect to the criminal allegations
6	THE VIDEOGRAPHER: The time is 1:29 p.m. We	6	against you. Is that fair?
7	are on the record, and this is the beginning of	7	A. They no, no, not at that time.
8	Media Unit 2. You may proceed.	8	Q. Okay. Well, what other matters was she
9	BY MR. KLOEWER:	9	representing you on?
10	Q. Okay. Mr. Flynn, before we broke for lunch we	10	A. No that was not that's not a fair
11	were discussing some of the communications you had	11	statement that you said.
12	received in November and December of 2020 that	12	Q. Okay. Well, I just want to be sure I
13	referenced Eric Coomer, brought up various claims about	13	understand clearly what matters specifically she was
14	him.	14	representing you with respect to during this November-
15	One of the last things we looked at was what	15	December time frame.
16	I believe is a draft affidavit from Josh Merritt. And I	16	A. Various various legal matters that were
17	wanted to talk about him a little bit more.	17	still pending.
18	MR. GREAVES: Object to the form and	18	Q. Okay. Were you helping her with legal
19	foundation of that but go ahead.	19	strategy as far as the lawsuits she was filing related
20	BY MR. KLOEWER:	20	to the election?
21	Q. Okay. If I recall your testimony correctly,	21	A. I would not characterize it like that. I
22	you said you don't recall ever having met Mr. Merritt?	22	mean, legal strategy. I'm not a lawyer.
23	A. That's correct.	23	Q. What would you say was your role in
24	Q. Okay. Do you recall ever communicating with	24	Well, were you involved in any way with
25	anybody that went by the alias of Spyder, S-P-Y-D-E-R?	25	the either research or preparation or investigation for
1	Page 111		

1	lawsuits that Ms. Powell went on to file?	1	MR. GREAVES: Objection to form.
2	MR. GREAVES: Object, and advise my client to	2	THE WITNESS: We what are you I mean,
3	assert his Fifth Amendment rights.	3	what do you mean, how did I start working with him?
4	BY MR. KLOEWER:	4	BY MR. KLOEWER:
5	Q. Did you read any of the lawsuits that Ms.	5	Q. Let's start there. How did you meet Lin Wood?
6	Powell filed? I'm going to refer to them generally as	6	A. I showed up to his home.
7	the Kraken lawsuits. There were four of them. Did you	7	Q. That was the first time you met him, when you
8	read those lawsuits? And she filed them in Georgia,	8	arrived at his house?
9	Arizona, Wisconsin and Michigan. Did you review any	9	A. I believe so.
10	A. I don't I don't recall. Uh-uh (Negative	10	Q. And why did you go to his house?
11	response). I don't recall reading them.	11	A. Sidney I believe was invited, if I remember
12	Q. Let's take a look at what you disclosed as	12	correctly.
13	MTF-21. I'll share my page here. And this is the next	13 14	Q. Okay. So she served as an intermediary,
14 15	sort of chronological documents in that time frame. We were looking at that before. This is from December 11th	15	basically introduced you to him? Is that fair?  A. No. I mean, an intermediary? I don't know
16		16	what you're talking about.
17	of 2020. This is an e-mail from Jim Penrose directly to	17	Q. Well, did did Sidney Powell introduce you
18	you, Lin Wood, and Ms. Powell. The subject line reads,	18	to Lin Wood?
19	From State Bar of Texas, Member Directory. Dominion Voting Ownership by George Soros.	19	A. I would say she did, yeah. I mean, you know,
20	Sorry. Just to be clear, we will mark this as	20	she's she's the one that had a that's the reason
21	Exhibit 24. Sorry I didn't get that in there. We're at	21	why we went down to his home.
22	No. 24 now.	22	Q. And was Mr. Wood representing you in a legal
23	(Exhibit 24, E-mail chain ending 12/11/2020	23	capacity at this time?
24	from Jim Penrose to Sidney Powell, et al., was	24	A. No.
25	marked for identification.)	25	Q. And who else did you did you go just with
23	Page 114	23	Page 116
		1	
1	BY MR. KLOEWER:	1	Ms. Powell, or were there more people who showed up at
1 2		1 2	Ms. Powell, or were there more people who showed up at Lin Wood's house?
	BY MR. KLOEWER:  Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.		• • • • • • • • • • • • • • • • • • • •
2	Q. Mr. Penrose states, "We'll dig into this."	2	Lin Wood's house?  A. I think we have been through that, but there
2 3	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."	2 3	Lin Wood's house?
2 3 4	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.	2 3 4	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some
2 3 4 5	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.	2 3 4 5	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And
2 3 4 5 6	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.  Do you know whose e-mail address that would that is?	2 3 4 5 6	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier.
2 3 4 5 6 7	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.  Do you know whose e-mail address that would that is?  A. I don't.	2 3 4 5 6 7	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all
2 3 4 5 6 7 8	<ul> <li>Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.</li> <li>Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.</li> <li>Do you know whose e-mail address that would that is?</li> <li>A. I don't.</li> <li>Q. Okay. The information here indicates Soros</li> </ul>	2 3 4 5 6 7 8	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places?
2 3 4 5 6 7 8	<ul> <li>Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.</li> <li>Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.</li> <li>Do you know whose e-mail address that would that is?</li> <li>A. I don't.</li> <li>Q. Okay. The information here indicates Soros</li> <li>Fund Management LLC. I'm not going to read the whole</li> </ul>	2 3 4 5 6 7 8	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out
2 3 4 5 6 7 8 9	<ul> <li>Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.</li> <li>Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.</li> <li>Do you know whose e-mail address that would that is?</li> <li>A. I don't.</li> <li>Q. Okay. The information here indicates Soros</li> <li>Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it</li> </ul>	2 3 4 5 6 7 8 9	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's
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2 3 4 5 6 7 8 9 10 11 12	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.  Do you know whose e-mail address that would that is?  A. I don't.  Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems.	2 3 4 5 6 7 8 9 10 11 12	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn.
2 3 4 5 6 7 8 9 10 11 12 13	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.  Do you know whose e-mail address that would that is?  A. I don't.  Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems.  Do you recall looking into this matter at the	2 3 4 5 6 7 8 9 10 11 12 13	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington,
2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.</li> <li>Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.</li> <li>Do you know whose e-mail address that would that is? A. I don't. Q. Okay. The information here indicates Soros</li> <li>Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems. Do you recall looking into this matter at the time, Mr. Flynn?</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington, D.C.?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Mr. Penrose states, "We'll dig into this."  And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise."  And below we have something from JimStep78.  Do you know whose e-mail address that would that is?  A. I don't.  Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems.  Do you recall looking into this matter at the time, Mr. Flynn?  A. I don't recall.  Q. Okay. As you sit here today, are you aware of any ownership interests that George Soros has with	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington, D.C.? A. Just because there was too much traffic. Too tough too tough getting around. Q. During this time frame when you and how
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.  Do you know whose e-mail address that would that is? A. I don't. Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems. Do you recall looking into this matter at the time, Mr. Flynn? A. I don't recall. Q. Okay. As you sit here today, are you aware of any ownership interests that George Soros has with Dominion Voting Systems?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington, D.C.? A. Just because there was too much traffic. Too tough too tough getting around. Q. During this time frame when you and how long did you stay at Tomotley?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.  Do you know whose e-mail address that would that is? A. I don't. Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems.  Do you recall looking into this matter at the time, Mr. Flynn? A. I don't recall. Q. Okay. As you sit here today, are you aware of any ownership interests that George Soros has with Dominion Voting Systems? A. I'm not.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington, D.C.? A. Just because there was too much traffic. Too tough too tough getting around. Q. During this time frame when you and how long did you stay at Tomotley? A. Probably, off and on, a good two weeks maybe.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Mr. Penrose states, "We'll dig into this." And if we scroll down we will see that Ms.  Powell stated, "To verify," in bold, "and advise." And below we have something from JimStep78.  Do you know whose e-mail address that would that is? A. I don't. Q. Okay. The information here indicates Soros  Fund Management LLC. I'm not going to read the whole thing. It's a bit of a lengthy document here. But it purports to indicate Soros Fund Management LLC having some ownership interest in Dominion Voting Systems.  Do you recall looking into this matter at the time, Mr. Flynn? A. I don't recall. Q. Okay. As you sit here today, are you aware of any ownership interests that George Soros has with Dominion Voting Systems? A. I'm not. Q. Are you aware of any relationship at all	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Lin Wood's house?  A. I think we have been through that, but there was a few other people. You know, you mentioned some Q. And A earlier. Q. Why did you go to Lin Wood's house, of all places? A. I I think wanted to we wanted to get out of Washington, D.C., as I recall. And I think it's because of a relationship that that, if I recall, I think Sidney had with Lynn. Q. Why did you want to get out of Washington, D.C.? A. Just because there was too much traffic. Too tough too tough getting around. Q. During this time frame when you and how long did you stay at Tomotley? A. Probably, off and on, a good two weeks maybe. Q. Was that just the late November time frame?
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1	Tomotley, were you in contact with Ron Watkins?	1	THE WITNESS: I'm going to I'm going to
2	A. I don't know I don't know that name.	2	assert my constitutional rights on the advice of
3	Q. He went by the alias of Code Monkey. Does	3	counsel and respectfully decline to answer your
4	that sound familiar?	4	question.
5	A. That does.	5	BY MR. KLOEWER:
6	Q. Okay.	6	Q. The person who opened the door for you was a
7	A. He was on he was on Twitter or something at	7	guy by the name of Garrett Ziegler, correct?
8	the time.	8	MR. GREAVES: Same objection.
9	Q. Okay. You are not familiar with the name Ron	9	BY MR. KLOEWER:
10	Watkins?	10	Q. Garrett Ziegler was a staff for Peter Navarro
11	A. I'm not. I'm not familiar.	11	at the time; is that right?
12	Q. You don't recall him running for Congress in	12	MR. GREAVES: Same objection.
13	Arizona?	13	BY MR. KLOEWER:
14	A. I don't, no.	14	Q. When did you first meet Garrett Ziegler?
15	Q. Did you have any contact with the individual	15	MR. GREAVES: Same objection.
16	that went by the name of Code Monkey?	16	BY MR. KLOEWER:
17	A. I don't recall at all, no.	17	Q. Are you still in touch with Garrett Ziegler
18	Q. All right. I want to take a look at what you	18	today?
19	disclosed here as MTF-195.	19	MR. GREAVES: Same objection.
20	A. Uh-huh (Affirmative response).	20	BY MR. KLOEWER:
21	Q. Do you see this e-mail, Mr. Flynn?	21	Q. Have you discussed Eric Coomer with Garrett
22	A. I do. Yes.	22	Ziegler?
23	Q. Okay. And this is from a few days later.	23	MR. GREAVES: Same objection.
24	This is December 19th of 2020. It's from Sidney Powell,	24	BY MR. KLOEWER:
25	Sidney@FederalAppeals.com, directly to you, nobody else Page 118	25	Q. Are you aware that Garrett Ziegler regularly Page 120
1	is cc'd on this, at your Flynn@ResilientPatriot.com	1	posts personal contact information for Eric Coomer on
2	e-mail address. And this is just a forward that Ms.	2	his Telegram page?
3	Powell appears to have received from an individual named	3	MR. GREAVES: Same objection.
4	Ted Groves?	4	BY MR. KLOEWER:
5	A. Okay.	5	Q. Do you know that he's posted Dr. Coomer's
6	Q. And it says, "FYI. Wonderful if true.	6	photograph on multiple occasions?
7	However, I am told Maggie Haberman hasn't left Brooklyn	7	MR. GREAVES: Same objection.
8	since March."	8	BY MR. KLOEWER:
9	So I believe this is a link here. And if we	9	Q. Are you aware that Mr. Ziegler regularly posts
10	scroll down in this document, we can see this article	10	Dr. Coomer's personal phone number on his Telegram page?
11	dated December 19th. It appears to be from the New York	11	MR. GREAVES: Same objection.
12	Times. It states, "Trump discussed naming campaign	12	BY MR. KLOEWER:
13	1 1 1 1 1 1 1 1	13	Q. Are you aware that Mr. Ziegler regularly posts
	lawyer as special counsel on election fraud."	1	
14	Do you know why Ms. Powell sent you this	14	photos of Dr. Coomer's home as well as his home address
	•	14 15	on his Telegram page and encourages people to go and
14 15 16	Do you know why Ms. Powell sent you this e-mail?  A. I don't recall.	15 16	on his Telegram page and encourages people to go and protest outside his house?
14 15 16 17	Do you know why Ms. Powell sent you this e-mail?  A. I don't recall.  Q. Okay. You visited the White House with Ms.	15 16 17	on his Telegram page and encourages people to go and protest outside his house?  MR. GREAVES: Same objection.
14 15 16 17 18	Do you know why Ms. Powell sent you this e-mail?  A. I don't recall.  Q. Okay. You visited the White House with Ms.  Powell and Patrick Byrne the night before on December	15 16 17 18	on his Telegram page and encourages people to go and protest outside his house?  MR. GREAVES: Same objection.  BY MR. KLOEWER:
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Amendment on anything related to anything — your 3 meeting at the White House. And so anything a meeting at the White House. And so anything a meeting at the White House. And so anything a related to that and people involved in that meeting 4 meeting at the White House. And so anything a meeting at the White House. And so anything a meeting at the White House. And so anything a meeting at the White House. And so anything a meeting at the White House of Mr. Byrne you are still in contact with Mr. Byrne towards the present day whether Mr. Byrne is warre 8 of Mr. Ziegler's ongoing harassment campaign against Dr. Coomer.  MR. KLOEWER: Soure.  BY MR. KLOEWER: Sure.  BY MR. KLOEWER: Sure.  MR. ROEAVES: You can go ahead.  MR. GRFAAVES: You can go ahead.  MR. A I'm not —  MR. GRFAAVES: You can go ahead.  MR. GRFAAVES: You				
meeting at the White House. And so anything related to that and people involved in that meeting we're asserting the Fifth Amendment right.  MR. KLOEWER: Okay, My question is more to Mr. Ziegler's ongoing harassment campaign against Dr. Coomer.  MR. GREAWES: Could you rephrase or restate the question then?  MR. KLOEWER: Sure.  MR. READEWER: O. A. Tyes.  Q. Are you aware that Mr. Ziegler continues to this day?  A. The not	1		1	-
related to that and people involved in that meeting we're asserting the Fifth Amendment right.  MR. KLOEWER: Okay. My question is more towards the present day whether Mr. Flym is saware of Mr. Edgeler's ongoing harassment campaign aguinst Dr. Coomer.  MR. GREAVES: Could you rephrase or restate the question ther?  MR. KLOEWER: Sure.  MR. KLOEWER:  MR. KLOEWER:  MR. KLOEWER:  MR. GREAVES: You can go ahead.  MR. G	2		2	Q. Did you discuss anything else on the phone
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6 Mr. Byme, you are still in contact with Mr. Byme towards the present day whether Mr. Flynn is aware of Mr. Eigeler's onging harassment campaign against Dr. Coomer.  9 MR. GREAVES: Could you rephrase or restate 11 the question then?  10 MR. KLOEWER: Sure.  11 How question then?  12 MR. KLOEWER: Sure.  13 BY MR. KLOEWER:  14 Q. Are you aware that Mr. Ziegler continues to publish personal contact information of Dr. Coomer to this day?  16 A. I'm not	4		4	
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8 of Mr. Ziegler's ongoing harassment campaign 9 against Dr. Coomer. 10 MR. GREAVES: Could you rephrase or restate 11 the question then? 12 MR. KLOEWER: Sure. 13 BY MR. KLOEWER: 14 Q. Are you aware that Mr. Ziegler continues to 15 publish personal contact information of Dr. Coomer to 16 this day? 17 A. I'm not — 18 MR. GREAVES: You can go ahead. 19 THE WITNESS: Yeah. I'm not aware. 20 BY MR. KLOEWER: 21 Q. Do you support that, Mr. Ziegler's efforts to 22 do that, now that you're aware of them? 23 A. To do what? 24 Q. To post personal contact information for Dr. 25 Coomer on social media. 26 Page 122 27 Q. And you were abso, in addition to Ms. Powell, 28 you were accompanied by Patrick Byrne at the White House 29 and the first time we actually met we spoke on a phone 20 call. 21 Q. Do you recall when that phone call necurred? 22 A. It do not support that type of behavior. 23 A. A friend of mine had spoken to me about him, 24 and the first time we actually met we spoke on a phone 25 and the first time we actually met we spoke on a phone 26 call. 27 Q. Do you recall when that phone call necurred? 28 A. A friend of mine had spoken to me about him, 29 and the first time we actually met we spoke on a phone 29 conversion? What did you discuss? 20 Q. What role did Mr. Byrne play in that? 21 A. I was summer of 2020. 22 Q. What role did Mr. Byrne play in that? 23 Q. For what? 24 A. For being part of the unjust attack against me and and my family. 29 Q. What role did Mr. Byrne play in that? 20 Q. What role did Mr. Byrne play in that? 21 Q. I what capacity? 22 Correctly, he was working for the government. 23 Q. Now, Did you accept Mr. Byrne's apology? 24 Q. To body ou were along in the and and my family. 25 Q. Okay. Did you accept Mr. Byrne's apology? 26 Vol World it have been at Tomotley? 27 A. Now, I due to sak him. 28 Q. Okay. Did you accept Mr. Byrne's apology? 28 Vol World it have been at Tomotley eventually led to your visit to the White House on vertically led to your visit to the White House on vertically led to yo	6		6	
9 against Dr. Coomer.  MR. GREAVES: Could you rephrase or restate 1 the question then?  MR. KLOEWER: Sure.  12 MR. KLOEWER: Sure. 13 BY MR. KLOEWER: 14 Q. Are you aware that Mr. Ziegler continues to 15 publish personal contact information of Dr. Coomer to 16 this day? 16 MR. GREAVES: You can go ahead. 17 A. I'm not 18 MR. GREAVES: You can go ahead. 18 How did that relationship develop then? It 16 minstain you restain you restain you were accompanied by Patrick Byrne at the White House 17 on 20 on you were accompanied by Patrick Byrne at the White House 18 on 20 how when the straine you restain the you were accompanied by Patrick Byrne at the White House 19 on 20 how about his involvement with the election material was summer of 2020. 19 A. I do not support that type of behavior. 20 A. I do not support that type of behavior. 21 A. I do not support that type of behavior. 22 D. A. Ad you were also, in addition to Ms. Powell. 23 D. How did you first meet Patrick Byrne? 24 O. How did you first meet Patrick Byrne? 25 O. How did you first meet Patrick Byrne? 26 BY MR. KLOEWER: 27 O. How did you first meet Patrick Byrne? 38 A. A friend of mine had spoken to me about him. 39 and the first time we actually met we spoke on a phone 20 call. 30 O. So summer of 2020. several months prior to the 2020 election. Is that fair? 31 O. So summer of 2020. several months prior to the 2020 election. Is that fair? 32 O. For what? 33 O. Wear a pologizing. 34 O. Por what? 35 O. What role did Mr. Byrne play in that? 36 O. What role did Mr. Byrne play in that? 37 O. Did you recall when that phone call occurred? 38 O. What role did Mr. Byrne play in that? 39 O. What role did Mr. Byrne play in that? 40 O. Did you accept Mr. Byrne's apology? 41 O. What was the first conversation you had with him after the election had occurred? 42 O. What role did Mr. Byrne play in that? 43 O. What role did Mr. Byrne play in that? 44 O. Did you recal when that phone call occurred? 45 O. What role did Mr. Byrne play in that? 46 O. Por what? 47 O. Did you re	7		7	today, correct?
the question then?  MR. KLOEWER: Sure.  BY MR. KLOEWER: Sure.  A. That's fair.  Q. Are you aware that Mr. Ziegler continues to publish personal contact information of Dr. Coomer to this day?  A. Tim not — 17	8	of Mr. Ziegler's ongoing harassment campaign	8	A. Yes.
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MR. KLOEWER: Sure.   12   different matters. Is that fair?	10	MR. GREAVES: Could you rephrase or restate	10	A. Yes.
13 BY MR. KLOEWER:   13 A. That's fair.   Q. So how did this relationship develop then? It	11	the question then?	11	Q. You've worked together on a variety of
14   Q. Are you aware that Mr. Ziegler continues to publish personal contact information of Dr. Coomer to this day?   16   16   17   18   18   17   18   18   19   19   19   19   19   19	12	MR. KLOEWER: Sure.	12	different matters. Is that fair?
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16 this day?  A. I'm not — 17	14	Q. Are you aware that Mr. Ziegler continues to	14	Q. So how did this relationship develop then? It
17 A. I'm not 18 MR. GREAVES: You can go ahead. 18 MR. GREAVES: You can go ahead. 19 THE WITNESS: Yeah. I'm not aware. 20 BY MR. KLOEWER: 21 Q. Do you support that, Mr. Ziegler's efforts to 22 do that, now that you're aware of them? 22 do. To post personal contact information for Dr. 24 Q. To post personal contact information for Dr. 25 Coomer on social media.  Page 122  1 A. I do not support that type of behavior. 2 Q. And you were also, in addition to Ms. Powell, 3 you were accompanied by Patrick Byrne at the White House 4 on December 18th, correct? 5 MR. GREAVES: Objection, Fifth Amendment. 6 BY MR. KLOEWER: 6 BY MR. KLOEWER: 7 Q. How did you first meet Patrick Byrne? 8 A. A friend of mine had spoken to me about him, 9 and the first time we actually met we spoke on a phone 10 call. 11 Q. Do you recall when that phone call occurred? 12 A. It was summer of 2020. 13 Q. So you never discussed election-related 14 election then. What was the substance of the 15 conversation? What did you discuss? 16 A. He was apologizing. 17 Q. For what? 18 A. For being part of the unjust attack against me 19 and my family. 20 Q. What role did Mr. Byrne play in that? 21 A. He I think he at the time, if I remember 22 correctly, he was working for the government. 23 Q. O Kay. Did you accept Mr. Byrne's apology? 25 Q. Okay. Did you accept Mr. Byrne's apology? 26 eventually led to your visit to the White House on	15	publish personal contact information of Dr. Coomer to	15	sounds like you had a phone call, he apologized, and you
18 MR. GREAVES: You can go ahead. 19 THE WITNESS: Yeah. I'm not aware. 20 BY MR. KLOEWER: 21 Q. Do you support that, Mr. Ziegler's efforts to 22 dot hat, now that you're aware of them? 23 A. To do what? 24 Q. To post personal contact information for Dr. 25 Comer on social media.  Page 122  1 A. I do not support that type of behavior. Q. And you were also, in addition to Ms. Powell, 3 you were accompanied by Patrick Byrne at the White House on December 18th, correct? 4 on December 18th, correct? 4 on December 18th, correct? 5 MR. KLOEWER: 6 BY MR. KLOEWER: 7 Q. How did you first meet Patrick Byrne? 8 A. A friend of mine had spoken to me about him, 9 and the first time we actually met we spoke on a phone call. 10 call. 11 Q. Do you recall when that phone call occurred? 12 A. It was summer of 2020, several months prior to the election in Tennessee in 2019? 13 Q. So you never discussed election-related matters prior to the 2020 election. Is that fair? 14 A. It was summer of 2020, several months prior to the clection in Tennessee in 2019? 15 Concernsation? What did you discuss? 16 A. It was summer of 2020, several months prior to the clection in Tennessee in 2019? 18 A. For being part of the unjust attack against me and my family. 19 Q. For what? 20 Q. What role did Mr. Byrne play in that? 21 A. He — I think he at the time, if I remember 21 Q. Would it have been at Tomotley? 22 correctly, he was working for the government. 23 Q. In what capacity? 24 A. You'd have to ask him. 25 Q. Okay. Did you accept Mr. Byrne's apology? 26 Q. Okay. Did you accept Mr. Byrne's apology? 27 eventually led to your visit to the White House on	16	this day?	16	didn't necessarily accept that apology. Correct me if
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20 BY MR. KLOEWER: 21 Q. Do you support that, Mr. Ziegler's efforts to 22 do that, now that you're aware of them? 23 A. To do what? 24 Q. To post personal contact information for Dr. 25 Coomer on social media.  Page 122  1 A. I do not support that type of behavior. 2 Q. And you were also, in addition to Ms. Powell, 3 you were accompanied by Patrick Byrne at the White House 4 on December 18th, correct? 4 MR. GREAVES: Objection, Fifth Amendment. 5 MR. GREAVES: Objection, Fifth Amendment. 6 BY MR. KLOEWER: 7 Q. How did you first meet Patrick Byrne? 8 A. A friend of mine had spoken to me about him, and the first time we actually met we spoke on a phone 10 call. 11 Q. Do you recall when that phone call occurred? 12 A. It was summer of 2020, several months prior to the 14 election then. What was the substance of the 15 conversation? What did you discuss? 16 A. He was apologizing. 17 Q. For what? 18 A. For being part of the unjust attack against me 19 and my family. 20 Q. What role did Mr. Byrne play in that? 21 A. He — I think he at the time, if I remember 22 correctly, he was working for the government. 23 Q. Okay. Did you accept Mr. Byrne's apology? 25 Use of have been there at the moment. But I think the relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we relationship afterwards, and I forget the next time we net, I think it was after the 2020 election.  1 A. I don't believe I did.  2 Q. Were you aware of Mr. Byrne's election-related efforts prior to the 2020 election, specifically his concerns about election integrity?  3 Liddi, but I don't believe I did.  4 A. I don't believe I did.  4 A. I don't believe I did.  5 A. I was not awar	18	MR. GREAVES: You can go ahead.	18	How did that relationship develop?
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1	December 18th; is that fair?	1	Q. And another purpose of your visit to the White
2	MR. GREAVES: Objection, Fifth Amendment.	2	House that night was to try to have Sidney Powell
3	BY MR. KLOEWER:	3	appointed as special counsel, correct?
4	Q. And the reason you visited the White House on	4	MR. GREAVES: Objection, Fifth Amendment.
5	December 18th was to try to encourage former President	5	BY MR. KLOEWER:
6	Trump to sign an executive order	6	Q. Was Sidney Powell appointed as special
7	MR. GREAVES: Objection.	7	counsel?
8	BY MR. KLOEWER:	8	MR. GREAVES: Objection, Fifth Amendment.
9	Q voting machines; is that right?	9	BY MR. KLOEWER:
10	MR. GREAVES: Objection, Fifth Amendment.	10	Q. Why not?
11	BY MR. KLOEWER:	11	MR. GREAVES: Objection, Fifth Amendment.
12	Q. Let's take a look at this document.	12	BY MR. KLOEWER:
13	You went to the White House with a copy of	13	Q. Let's take a look at what's been disclosed as
14	this draft executive order dated December 16th, 2020.	14	MTF-198. This is an e-mail from a few days later. This
15	"Presidential findings to preserve, collect, and analyze	15	is from Sidney Powell to you and Abbie Frye, e-mail
16	national security information regarding the 2020 general	16	address Abbie@kracken-wood.com, sent Monday, December
17	election."	17	21st, 2020. Who is Abbie Frye?
18	Correct?	18	A. She is a lawyer.
19	MR. GREAVES: Objection, Fifth Amendment.	19	Q. Does she work with Ms. Powell?
20	MR. KLOEWER: And again, we'll mark this as	20	A. She did.
21	Exhibit 25. I apologize again.	21	Q. The subject line is, "Evidence for
22	(Exhibit 25, Document 12/16/2020 headed	22	Congressional contacts."
23	Presidential Findings, was marked for	23	And if we scroll down here, it states and
24	identification.)	24	the signature block here is from the same individual we
25	BY MR. KLOEWER:	25	saw before, Christos Makridis. I'm not sure if I'm
	Page 126		Page 128
1	Q. Who wrote this or who drafted this executive	1	pronouncing his name correctly, but I believe that's the
2	order, Mr. Flynn?	2	best I can do.
3	MR. GREAVES: Objection, Fifth Amendment.	3	And Mr. Makridis states
4	BY MR. KLOEWER:	4	I want to go through several aspects of this,
5	Q. Did Phil Waldron draft this document?	5	so we will spend a little time on this.
6	MR. GREAVES: Objection, Fifth Amendment.	6	"Hi Emily and Howard. I've continued
7	BY MR. KLOEWER:	7	coordinating with Bob Destro and John Baker."
8	Q. If we look through this document, on the top	8	So I can see here that this e-mail is
9	line of the second page it identifies Dr. Coomer by name	9	addressed to Emily, it appears to be Emily Newman. Do
10	and states, "Just days prior to the election of November	10	you know who is Emily Newman?
11	3rd, 2020, Federal Judge Totenberg found, after three	11	A. She's a lawyer.
12	days of testimony, including by Dominion executive Eric	12	Q. And where does she work?
13	Coomers," there's a slight typo there, and it quotes	13	A. No idea.
14	some findings from Judge Totenberg from that proceeding	14	Q. Was she working with Ms. Powell at the time?
15	in Georgia.	15	A. I don't know. I don't recall.
16	Do you know why Dr. Coomer was referenced in	16	Q. And for the fourth or fifth but not the last
17	this draft executive order?	17	time I have not marked another exhibit. We are going to
18	MR. GREAVES: Objection, Fifth Amendment.	18	call this Exhibit 26. Apologies. I'm going to try to
19	BY MR. KLOEWER:	19	pay closer attention here. Exhibit 26.
20	Q. And you believed at the time, or at least you	20	(Exhibit 26, E-mail chain ending 12/21/2020
21	were arguing that President Trump should sign this order	21	from Sidney Powell to flynn resilientpatriot.com,
22	to seize, collect, retain, and analyze all the voting	22	et al., was marked for identification.)
23	machines in the country, correct?	23	BY MR. KLOEWER:
24	MR. GREAVES: Objection, Fifth Amendment.	24	Q. And Howard. Do you know who Howard is?
25	BY MR. KLOEWER:	25	Howard415@protonmail?
	Page 127		Page 129

1	A. I believe, if it's the guy that I remember,	1	A. I don't know what he's referring to.
2	he's a lawyer, another lawyer.	2	Q. Okay. Were you involved in efforts to examine
3	Q. And Emily Newman, she is actually an executive	3	voting machines in Antrim County, Michigan?
4	for The America Project as well, correct?	4	A. I was involved in efforts to get people to
5	A. I believe she worked with The America Project,	5	Antrim County.
6	yeah, yeah.	6	Q. Did you go to Antrim County yourself?
7	Q. So Mr. Makridis states to Ms. Newman and	7	A. No.
8	Mr. Kleinhendler, I believe his name is Howard	8	Q. And why why were you involved in efforts to
9	Kleinhendler, "I have continued coordinating with Bob	9	get people to Antrim County?
10	Destro and John Baker."	10	A. Because I was able to coordinate the travel
11	Do you know who Bob Destro is?	11	basically. Coordinating the travel.
12	A. I don't.	12	Q. Okay. But why why were people going to
13	Q. If I told you that he was an undersecretary at	13	Antrim County and why were you helping with that effort?
14	the Secretary of State's office, would you have a reason	14	A. There was there was interest in if I
15	to disagree with that?	15	recall right, there was interest in in some outcome
16	A. If you say so.	16	of what they learned up there from the 2020 election.
17	Q. Okay. The same question for John Baker. Do	17	Q. There was some confusion about vote totals out
18	you know who that is?	18	of Antrim County. Is that a fair assessment?
19	A. I don't.	19	A. That sounds yeah, that sounds about right.
20	Q. Mr. Makridis states, "There are some positive	20	That sounds about right.
21	developments in building congressional support. Senato		Q. And who is the lawyer who got an order in
22	Cotton needs to know the name of the case from the	22	Antrim.
23	federal court in Georgia which issued the order	23	A. I don't recall.
24	preventing changes in the voting machines, whether the	24	Q. Does the name Matthew DePerno sound familiar?
25	order still applies, and the names, contacts and the Page 130	25	A. It does.
1	attorneys handling this case."	1	Q. Okay. How do do you know Mr. DePerno?
2	So Ms. Powell has forwarded this to you and	2	A. I have met him and I know him.
3	Ms. Frye. Were you involved in efforts to coordinate	3	Q. How did you meet Mr. DePerno?
4	with members of Congress at this time?	4	A. I don't know how we first met. He did he
5	A. I don't recall.	5	and I did meet in Washington, D.C., when he came for a
6	Q. You don't remember if you were meeting with	6	visit one time. I remember that.
7	members of Congress in late December of 2020?	7	Q. Was that was that on January 5th of 2021?
8	A. No, I don't recall if I was.	8	A. I forget no. I forget the date. I don't
9	Q. Did you meet with Senator Cotton?	9	recall the date.
10	A. I at that time, no, I don't believe I did.	10	Q. And you went on to co-star in The Deep Rig
11	Q. Did you speak with him on the phone?	11	with Mr. DePerno, didn't you?
12	A. I don't recall if I did.	12	A. I was in that. I didn't I would not have
13	Q. Mr. Makridis goes on to state, "Relatedly,	13	been able to tell you whether DePerno was in it or not.
14	John Baker has been working with Allied Security and the	14	But I was I was filmed for that.
15	lawyer who originally got the order in Antrim."	15	Q. It says, "He's been working with Allied
16	So Allied Security I understand to mean the	16	Security and the lawyer who got the order in Antrim, as
17	Allied Security Operations Group that we've already	17	well as Joe Oltmann, who put the information about Eric
18	discussed.	18	Coomer and Garland Favortino."
19	Do you have any reason to disagree with that	19	I believe that's another typo referring to
20	understanding of this what Mr. Makridis has stated	20	Garland Favorito
21	here?	21	Do you know who Garland Favorito is?
22	A. I have no reason to disagree with it, no.	22	A. I I don't know who he is. I don't know
23	Q. And the lawyer who originally got the order in	23	him. I have heard of him.
24	Antrim, do you know what he's referring to there? What	24	Q. What's the context in which you have heard of
25	is Antrim? Page 131	25	Mr. Favorito?
	1 450 131		1

1	A. In the media.	1	A. I don't believe I did. I don't I don't
2	Q. And what has the media stated about	2	have any knowledge of that.
3	Mr. Favorito that	3	·
			Q. Do you deny that you did?
4	A. I think he's just he's another individual	4	A. Deny I did what?
5	who has been fighting election integrity issues, if I	5	Q. Helped coordinate a meeting between Joe
6	recall right, in, I think, in the state of Georgia.	6	Oltmann, Matthew DePerno, Bob Destro, and John Baker on
7	Q. The last line here says, "Our team should 100	7	January 6th?
8	percent be coordinating with them since they have more	8	MR. GREAVES: I'm going to object and ask my
9	information on the machines, but we need to be sharing	9	client, advise him to assert his Fifth Amendment
10	it."	10	rights here.
11	Were you coordinating with Joe Oltmann and	11	BY MR. KLOEWER:
12	Matthew DePerno at this time, as Mr. Makridis suggeste	d12	Q. Do you know why Joe Oltmann and Matthew
13	you should be?	13	DePerno would be meeting with people at the State
14	A. I don't recall if I was.	14	Department on January 6th?
15	Q. Do you deny that you were?	15	MR. GREAVES: Objection, Fifth Amendment.
16	A. No, no. I know I had I had been back and	16	BY MR. KLOEWER:
17	forth with Matt DePerno, but not I don't recall being	17	Q. Can you think of any good reason for Joe
18	back and forth with Oltmann.	18	Oltmann and Matthew DePerno to be meeting with people at
19	Q. You never spoke to him on the phone at the	19	the State Department on
20	time?	20	MR. GREAVES: Objection.
21	A. I don't remember.	21	BY MR. KLOEWER:
22	Q. Do you know a guy by the name of Sam Faddis?	22	Q January 6th?
23	A. Sam Faddis. I do.	23	-
			MR. GREAVES: Objection, Fifth Amendment.
24	Q. How do you know Mr. Faddis?	24	BY MR. KLOEWER:
25	A. He writes a great substack.  Page 134	25	Q. Where were you on January 6th, Mr. Flynn?  Page 136
1	Q. Have you met him in person?	1	MR. GREAVES: Objection, Fifth Amendment.
2	A. I don't know if I ever have. I don't know.	2	BY MR. KLOEWER:
3	Q. Do you recall speaking with him during this	3	Q. Did you go to the State Department with Joe
4	time frame, November-December of 2020?	4	Oltmann and Matthew DePerno that day?
5	A. I don't.	5	MR. GREAVES: Objection, Fifth Amendment.
6	Q. Did Ms. Powell tell you that she had had	6	BY MR. KLOEWER:
7	Mr. Faddis come to Colorado to interview Mr. Oltmann?	7	Q. Were you staying at the Willard Hotel on
8	A. I don't recall that.	8	January 5th and January 6th?
9	Q. Did Mr. Faddis did you ever discuss	9	MR. GREAVES: Objection, Fifth Amendment.
10	Mr. Oltmann or his claims with Mr. Faddis?	10	BY MR. KLOEWER:
11	A. I don't remember if I did.	11	Q. You spoke on stage on Freedom Plaza on the
		12	night of January 5th, correct?
12	Q. Did Ms. Powell tell you that Mr. Faddis had		A. I did.
13	concluded that Oltmann was embellishing his claims?	13	
14	A. I don't recall that.	14	Q. And Joe Oltmann also
15	Q. So, but you don't deny working, coordinating	15	A. Now, Freedom Freedom Plaza is the one on
16	with Mr. DePerno and Mr. Oltmann at this time. Do you	16	the end of Pennsylvania Avenue, they call it Pershing
17	know why Ms. Powell was forwarding this e-mail to you?	17	Plaza; is that right?
18	A. I'm speculating. Maybe just for my	18	Q. I believe so, yes.
19	information, I guess.	19	A. I did, yes.
20	Q. And are you aware that Mr. Oltmann and	20	Q. And Joe Oltmann also spoke on stage that
21	Mr. DePerno went on to meet with Bob Destro and John	21	night, right?
22	Baker at the Secretary of State's office on January 6th?	22	A. I have no idea.
23	A. No, I don't recall that.	23	Q. Did you see Joe Oltmann's speech that night?
24	Q. Did you help to coordinate that meeting	24	A. I don't believe I did. Don't recall.
25	between Mr. Oltmann and the State Department officials?	25	Q. You don't remember he was the final speaker of
	Page 135		Page 137

1	the evening?	1	A. Be specific.
2	A. I don't I don't know that.	2	Q. Did you request
3	Q. Do you recall seeing him present a PowerPoint	3	Well, John Eastman famously sent an e-mail
4	presentation where he discussed Eric Coomer and his	4	stating that he should believed that he should be on
5	theories about the election being rigged?	5	the pardon list. And I'm wondering if you also
6	A. I don't recall.	6	requested a pardon from President Trump for any of your
7	Q. Did you speak with Mr. Oltmann back stage at	7	activities related to what occurred on January 6th.
8	that event that evening?	8	MR. GREAVES: Objection. The Fifth Amendment.
9	A. I don't recall if we did or or I wasn't	9	BY MR. KLOEWER:
10	I wasn't there that long.	10	Q. Do you believe Oltmann's story that Patrick
11	Q. Do you deny speaking with Joe Oltmann back	11	Byrne requested a pardon from Mr. Giuliani that evening?
12	stage on January 5th?	12	A. I mean, I don't have any recollection of any
13	A. I don't deny it. I just don't recall if we	13	story like that, so I just you know, I don't I
14	did. It was packed with people.	14	don't I don't know.
15	Q. And did you spend any time in the Willard	15	Q. So we have just gone through a whole series of
16	Hotel with Joe Oltmann and Rudy Giuliani and John	16	communications throughout November, December and events,
17	Eastman?	17	possible conversations with Mr. Oltmann, claims about
18	A. I don't remember if I did. I know I I'm	18	Eric Coomer that long preceded the ReAwaken America
19	just trying to think if I met with Rudy Giuliani. I did	19	Tour. But if I understand your testimony correctly, you
20	meet with Rudy, but I don't know if it was in the	20	never thought any of those claims were worth even
21	Willard or not. I just I don't recall that.	21	investigating, did you?
22	Q. When did you meet with Mr. Giuliani?	22	MR. GREAVES: Objection to form.
23	MR. GREAVES: Objection, Fifth Amendment.	23	MS. WEISS: Join.
24	THE WITNESS: Yeah, yeah.	24	THE WITNESS: Which claims? I mean, you
25	BY MR. KLOEWER:	25	are now you are like, which claims? If it
	Page 138		Page 140
1	Q. Were you in the Willard Hotel on the evening	1	was last month, maybe I would have a better memory
2	of January 6th after the attack on the capital?	2	of it all. But what claims are you talking about?
3	MR. GREAVES: Objection, Fifth Amendment.	3	BY MR. KLOEWER:
4	BY MR. KLOEWER:	4	Q. Claims that Eric Coomer partook in an Antifa
5	Q. Were you in the room with Joe Oltmann, Rudy	5	conference call, that he claimed on that call to have
6	Giuliani, and Patrick Byrne on the evening of January	6	rigged the election, and that he did, in fact, rig the
7	6th?	7	election. You never thought those claims were credible,
8	MR. GREAVES: Objection, Fifth Amendment.	8	did you?
9	BY MR. KLOEWER:	9	A. I think I've already answered all those
10	Q. Are you aware that Mr. Oltmann has repeatedly	10	questions.
11	told a story about how he was sitting at a table with	11	Q. Well, you stated before you didn't recall ever
12	Rudy Giuliani on the evening of January 6th and Patrick	12	hearing about Eric Coomer, but now we have gone through
13	Byrne entered the room to request that Mr. Giuliani	13	all these communications. I'm wondering if, having
14	organize a pardon for him from President Trump?	14	refreshed your memory, you have any memory now that you
15	A. I'm not. I'm not aware of that.	15	were aware of Eric Coomer but you didn't believe the
16	Q. Were you in the room for that conversation?	16	claims about him were credible?
17	MR. GREAVES: Objection, Fifth Amendment.	17	MR. GREAVES: Objection to form.
18	BY MR. KLOEWER:	18	MS. WEISS: Join.
19	Q. Has Mr. Byrne ever told you that he requested	19	THE WITNESS: I mean, you know, I had heard
20	a pardon from Mr. Giuliani?	20	about Eric Coomer in the media and from different
21	MR. GREAVES: Objection, Fifth Amendment.	21	things going back and forth. But, you know, claims
22	BY MR. KLOEWER:	22	of all this stuff, I mean, I just don't have any
23	Q. Do you know if Mr. Byrne requested a pardon?	23	recollection of what what, you know, resulted at
24	A. I'm not aware.	24	that time.
25	Q. Did you request a pardon, Mr. Flynn?	25	BY MR. KLOEWER:
	Page 139		Page 141

Q. It lask a more general question based on your professional experience. Are you familiar with the term "actionable intelligence"?  A. I am. "actionable intelligence"?  MR. GRFAVFS: Objection. My client is a fact witness, not an expert witness.  MR. GRFAVFS: Objection. My client is a fact witness, not an expert witness.  BY MR. KLOEWER:  Q. Yeah. Im asking based on his experience in his field. And I don't intend to utilize this as expert testimony. I'm just tasking for his understanding of what makes it actionable? That it's — you know, that it has been verified by, you where we will be somebody who is 1 standing with somebody else and susys. This in the room with, you know, with Brad Kloewer right now, and here' a photo of him standing here with me.  That would be pretty good.  Q. Q. Let me rephrase that.  A. It most sure what you're asking me. Q. Let me rephrase that.  A. It most sure what you're asking me. Q. Let me rephrase that.  A. It most sure what you're asking me. Q. Let me rephrase that.  A. It most sure what you're asking me. Q. Let me rephrase that.  A. It most sure what you're asking me. Q. Let me rephrase that.  D. A. This most sure what you're asking me.  D. Let me rephrase that.				
opinions on actionable intelligence are, are not even close to at issue in this case. He's not an expert witness.  MR. GREAVISS: Objection. My client is a fact witness, not an expert witness.  MR. GREAVISS: Objection. My client is a fact witness, not an expert witness.  BY MR. KLOEWER:  O, Yeah. Tun saking based on his experience in his field. And I don't intend to utilize this as expert testimony. I'm just asking for his understanding of testimony. I'm just asking for his understanding of testimony. I'm just asking for his understanding of a hard makes intelligence actionable.  A. A hart makes is actionable? That it's —  it's — you know, that it has been verified by, you hat makes a good source?  A. A bulletproof source would be somebody who is standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's a actionable because if it's not, people could get hurt, right?  A. Are you asking that as, you know, from a Page 142  I howyer's perspective?  O, Let me rephrase that.  O, Mar I'm indigence on be an anything new about fric Coomer?  A. A'm not sure what you're asking me.  O, Let me rephrase that.  I have appeared to be actionable in order to act on inclingence needed to be actionable in order to act on inclingence enceded to be actionable in order to act on take that are — as long as they are within the rules of that are — as long as they are within the rules of that are — as long as they are within the rules of that are — as long as they are within the rules of that are — as long as they are within the rules of the end of somebody, and it may not be 100 percent.  O, Let me rephrase that.  O,	1	Q. I'll ask a more general question based on your	1	but there's going to come a point where it becomes
4 A. I am.  MR. GREAVES: Objection. My client is a fact  witness, not an expert witness.  THE WITNESS: Yeah, yeah.  8 BY MR. KLOEWER:  9 Q. Yeah. I'm asking based on his experience in his field. And I don't intend to utilize this as expert testimony. I'm just asking for his understanding of testimony. I'm just asking for his understanding of the sunderstanding of the sund	2		2	abusive of my client and his time. What his
Sometimes, not an expert witness.  MR. GREAVES: Objection. My client is a fact witness, not an expert witness.  MR. GREAVES: Veah, yeah.  MR. GREAVES: Yeah, yeah.  MR. GREAVES: Yeah, yeah.  MR. GREAVES: Yeah, yeah.  MR. GREAVES: Veah, yeah.  MR. GREAVES: Pobjection. My client is a fact witness, not an expert witness.  MR. GREAVES: Veah, yeah.  MR. GREAVES: Veah, yeah.  MR. GREAVES: Veah, yeah.  MR. GREAVES: Pob, and a say and the relevance of this is fact of the year of that is I had no reason to believe that Eric Coomer - that I foe Oltmann's claims were true. And I guess the reverse - the cleiw that the very firm of the propose of that is I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that they were true throughout his November-December time frame, did you?  A. I had no reason to believe that the verence of that is I had no reason to believe that the verence of that is I had no reason to believe that the verence of that is I had no reason to believe that the your everence meet throughout his November-December time frame, did you?  A. I had no reason to believe that the food meet need to had not not had not meet not not the properties of that is I had no reason to believe that the frame and the laws of the properties of that is I had no reason to believe that the frame and the laws of the properties of that i	3	_	3	opinions on actionable intelligence are, are not
6 Witness, not an expert witness. 7 THE WITNESS: Yeah, yeah. 8 PY MR, KLOEWER: 9 Q, Yeah. I'm asking hased on his experience in his field. And I don't intend to utilize this as expert testimony. I'm just asking for his understanding of that makes intelligence actionable. 11 what makes intelligence actionable what was an incomplete what w	4	A. I am.	4	even close to at issue in this case. He's not an
THE WITNESS: Yeah, yeah,  8 BY MR. KLOEWER: 9 Q. Yeah. I'm asking based on his experience in his field. And I don't intend to utilize this as expert to this field. And I don't intend to utilize this as expert to what makes it actionable. 12 what makes intelligence actionable. 13 A. What makes it actionable? That it's — 13 reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that Joe Oltmann's Claims were true. And I guess the reverse — the reverse for that Joe Oltman	5	MR. GREAVES: Objection. My client is a fact	5	expert witness.
8 BY MR. KLOEWER: Q. Yeah. I'm asking based on his experience in his field. And I don't intend to utilize this as expert testimony. I'm just asking for his understanding of what makes intelligence actionable. 12 what makes it actionable? That it's — 13 A. What makes it actionable? That it's — 14 it's — you know, that it has been verified by, you how, what it has been verified by, you how, what it has been verified by, you how, what is a good source? 16 Q. What's a good source? 17 A. A bulletproof source would be somebody who is standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's 19 a photo of him standing here with me. 19 with, you know, with Brad Kloewer right now, and here's 19 a photo of him standing here with me. 19 That would be pretty good. 20 Q. And it's important for intelligence to be actionable, because if it's not, people could get hurt, right? 21 That would be pretty good. 22 Q. And it's important for intelligence to be actionable, because if it's not, people could get hurt, right? 23 A. Are you asking that as, you know, from a Page 142 24 Q. Let me rephrase that. 25 A. Are you asking that as a very poody-worded question. 26 In your experience in the militury, intelligence needed to be actionable in order to act on it. Is that a fair statement? 27 A. Well, there's things you do on a bartlefield that are — as long as they are within the rules of engagement and the laws of war, that would not engeagement and the laws of war, that would not engagement and the laws of war, that would not engagement and the laws of war, that would not engagement and the laws of war, that would pore entable in order to act on it. Is that a fair statement? 28 Q. Sure. But you stated that intelligence needed to be verified by a good source — 10 capagement and the laws of war, that would not engagement and the laws of war, that would not engagement and the laws of war, that would not engagement and the laws of war, that would not engagement and the laws of war, that w	6		6	BY MR. KLOEWER:
9 Were true throughout this November-December time frame, did you? 10 Instincted. And I don't intend to utilize this as expert to testimony. I'm just asking for his understanding of what makes intelligence actionable. 12 What makes intelligence actionable. 13 A. What makes it actionable? That it's 13 reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that doe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that doe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse the reverse of that is I had no reason to believe that Joe Oltmann's claims were true. Interest of that the ween I had no reason to believe that Joe Oltmann's claims were true. Interest that the ween I had not a large of the first in the poll of the firm with jus	7	THE WITNESS: Yeah, yeah.	7	
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testimony. I'm just asking for his understanding of what makes intelligence actionable.  A. Had no reason to believe that Joe Oltmann's claims were true. And I guess the reverse — the claims were true. And I guess the reverse that it is not people and the two weren't. I mean. I just don't — I don't recall.  Q. Between this November-December in the rame and Mr. Commer's and The rule in the row and there is a pour thin for intelligence in the row and here is a photo of him standing here with me.  10	9		9	were true throughout this November-December time frame,
12   what makes intelligence actionable.   12   claims were true. And I guess the reverse — the reverse of that is I had no reason to believe that they reverse.   14   ris — you know, that it has been verified by, you   14   weren't. I mean, I just ont — I don't recall.   15   Q. Between this November-December time frame and   16   Mr. Oltmann's first appearance on the ReAwaken America   17   Tourn, did you ever learn anything new about Eric Coomer?   18   And I'm talking about the first six months of December   2021.   20   a photo of him standing here with me.   20   And it's important for intelligence to be a cationable, because if it's not, people could get hurt, right?   21   lawyer's perspective?   1   lawyer's perspective?   2   Q. Let me rephrase that.   2   2   2   Q. Let me rephrase that.   2   2   2   2   Q. Let me rephrase that.   2   2   2   2   2   2   3   3   3   3	10	-	10	did you?
A. What makes it actionable? That it's—  14 it's—you know, that it has been verified by, you  15 know, good sources.  A. A bulletproof source would be somebody who is  16 Q. What's a good source?  A. A bulletproof source would be somebody who is  17 standing with somebody else and says, I'm in the roun  18 standing with somebody who is  19 standing with somebody who is  19 standing with somebody belse and says, I'm in the roun  19 with, you know, with Brad Kloewer right now, and here is  20 a photo of him standing here with me.  21 That would be pretty good.  22 Q. And it's important for intelligence to be  23 actionable, because if it's not, people could get hurt, right?  24 right?  25 A. Are you asking that as, you know, from a Page 142  1 lawyer's perspective?  2 Q. Let me rephrase that.  3 A. I'm not sure what you're asking me.  4 Q. Let me rephrase that. That was a very  5 poorly-worded question.  4 Q. Let me rephrase that. That was a very  5 poorly-worded question.  6 In your experience in the military,  7 intelligence needed to be actionable in order to act on  8 it. Is that a fair statement?  9 A. Well, there's things you do on a battlefield  10 that are—as long as they are within the rules of  11 engagement and the laws of war, that would not  12 encessarily be something that you would, you know, have  13 to go to court over, I mean in terms of what you are  14 talking about. I mean, there's things that you do on a last thing about. I mean, there's things that you do no a last thing about. I mean, there's things that you do no a last battlefield with intelligence that could rest in the  19 a. Ut-huh (Affirmative response).  10 Q. Sure. But you stated that intelligence needed  10 to be verified by a good source—  11 Guilden that have a very to be actionable. And why is that?  22 Q. Were you aware that Eirc Coomer had filed a defamation lawsuit against—you just answered with respect to Ms. Powell, but that that lawsuit also named  19 A. Ut-huh (Affirmative response).  10 Q. Sure. But you stated that inte			11	A. I had no reason to believe that Joe Oltmann's
it's — you know, that it has been verified by, you know, good sources.  Know, good sources.  A A bulletproof source would be somebody who is standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's a photo of him standing here with me.  That would be pretty good.  Q. And it's important for intelligence to be a actionable, because if it's not, people could get hurt, right?  A. Are you asking that as, you know, from a Page 142  I lawyer's perspective?  Q. Let me rephrase that.  A. I'm not sure what you're asking me.  Joury worded question.  In your experience in the military, in intelligence needed to be actionable in order to act on that are —as long as they are within the rules of engagement and the laws of war, that would not enecessarily be something that you would, you know, have to go to court over, I mean in terms of what you are necessarily be something that you would, you know, have to go to court over, I mean in terms of what you are to go to this to be verified by a good source?  Mr. Oldmann's first appearance on the ReAwaken America Tour, did you ever learn anything new about Eric Coomer?  And I'm talking about the first six months of December 192021.  A. I don't remember if I learned anything new about Eric Coomer?  And I'm talking about the first six months of December 20201.  A. I don't remember if I learned anything new about thin. He wasn't certainly the center of my about thim. He wasn't certainly the center of my about thim. He wasn't certainly the center of my about thim. He wasn't certainly the center of my about thim. He wasn't certainly the center of my about him?  A. A fre you asking that as, you know, from a Page 142  1 lawyer's perspective?  Q. Let me rephrase that.  A. I'm averent lawshing any effort to learn a about him.?  A. Not unless I - no, I really wasn't. No.  Page 144  1 lawyer's perspective?  Q. Let me rephrase that.  A. I have no opinion about that.  Q. And you know that Eric Coomer sued Sidney  Powell for defamation on Dece		_	12	claims were true. And I guess the reverse the
15 know, good sources. Q. What's a good source? 18 standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here 19 with, you know, with Brad Kloewer right now, and here 19 a photo of him standing here with me. 20 a photo of him standing here with me. 21 That would be pretty good. 22 Q. And it's important for intelligence to be actionable, because if it's not, people could get hurt, 24 right? 23 actionable, because if it's not, people could get hurt, 24 right? 24 rought in the wash't certainly the center of my attention. 25 A. Are you asking that as, you know, from a Page 142 26 lawyer's perspective? 27 Q. Let me rephrase that. 38 A. I'm on sure what you're asking me. 49 Q. Let me rephrase that. That was a very 40 intelligence needed to be actionable in order to act on 17 intelligence needed to be actionable in order to act on 18 that are -as long as they are within the rules of 10 that are -as long as they are within the rules of 11 that are -as long as they are within the rules of 12 to go to court over, I mean in terms of what you are 13 talking about. I mean, there's things but you do on a taltefield to battle field with intelligence needed to be actionable. And why is that? 29 Q. Sue. But you stand that intelligence needed to be actionable. And why is that? 30 Q. Were you aware that Eric Coomer of whomever, but I knew that she was being sued. 31 Rought gold source - 18 A. Uh-huh (Affirmative response). 32 Q. Were you aware that Eric Coomer had filed a defanation lawsuit against you just answered with respect to Ms. Powell, but that that lawsii also named the laws of war, that would not 14 to 16 that or 24 to 16 to be erified by a good source? What are the risks? 33 Why wouldn't you take action on intelligence that hadn't 21 don't recall reading it. 34 Q. Were you aware that Newsmax settled. I am. But I don't remember tid learn anything new about thim. Powell, but the that lawsii also named the laws of war, that was a powel thim? He wasn't retainly the center			13	reverse of that is I had no reason to believe that they
16   Q. What's a good source?   16   Mr. Oltmann's first appearance on the ReAwaken America   17   Tour, did you ever learn anything new about Eric Coomer?   18   And I'm talking about the first six months of December   19   with, you know, with Brad Kloewer right now, and here   19   2021.   2021.   2021.   2022.   2023.   2024.   2025.	14	it's you know, that it has been verified by, you	14	weren't. I mean, I just don't I don't recall.
A. A bulletproof source would be somebody who is standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's photo of him standing here with me.  20 a photo of him standing here with me.  21 That would be pretty good.  22 Q. And it's important for intelligence to be actionable, because if it's not, people could get hurt, right?  24 right?  25 A. Are you asking that as, you know, from a Page 142  26 Q. Let me rephrase that.  27 A. I'm not sure what you're asking me.  28 Q. Let me rephrase that.  29 poorly-worded question.  20 In your experience in the military, intelligence needed to be actionable in order to act on that are — as long as they are within the rules of that are — as long as they are within the rules	15	_	15	Q. Between this November-December time frame and
standing with somebody else and says, I'm in the room with, you know, with Brad Kloewer right now, and here's 19 with, you know, with Brad Kloewer right now, and here's 19 a photo of him standing here with me. 20 a photo of him standing here with me. 21 That would be pretty good. 21 about him. He wasn't certainly the center of my attention. Q. So you weren't making any effort to learn actionable, because if it's not, people could get hurt, 23 actionable, because if it's not, people could get hurt, 24 right? 24 about him. He wasn't certainly the center of my attention. Q. So you weren't making any effort to learn about him? 25 A. Not unless I no, I really wasn't. No. Page 144 26 Page 142 Page 142 Page 142 Page 142 Page 144 Page 1	16	-	16	
with, you know, with Brad Kloewer right now, and here's 19 a photo of him standing here with me.  10 a photo of him standing here with me.  21 That would be pretty good.  22 Q. And it's important for intelligence to be 23 actionable, because if it's not, people could get hurt, 24 right?  25 A. Are you asking that as, you know, from a Page 142  1 lawyer's perspective?  2 Q. Let me rephrase that. 2 A. I'm not sure what you're asking me. 3 A. I'm not sure what you're asking me. 4 Q. Let me rephrase that. That was a very 5 poorly-worded question. 5 In your experience in the military, 6 In your experience in the military, 7 intelligence needed to be actionable in order to act on 8 that are as long as they are within the rules of 10 that are as long as they are within the rules of 11 enegagement and the laws of war, that would not 12 necessarily be something that you would, you know, have 13 to go to court over, I mean in terms of what you are 14 talking about. I mean, there's things that you do on a 15 battle field with intelligence that could result in the 16 death of somebody, and it may not be 100 percent. 17 Q. Sure. But you stated that intelligence needed 18 to be verified by a good source? 29 Why wouldn't you take action on intelligence that hadn't 20 Q. For it to be actionable. And why is that? 20 Q. For it to be actionable. And why is that? 21 Why wouldn't you take action on intelligence that hadn't 22 been verified by a good source? What are the risks? 23 MR. GREAVES: Form. And just -the relevance 24 of this is getting to the point - and we put 25 we've tolerated a lot of irrelevant questions here. 26 A. I have mashing any effort to learn about him. He wasn't certainly the center of my attention. 29 A. Not unless I - no. I really wasn't. No.  20 D. So you weren't making any effort to learn about him. He wasn't certainly the center of my attention. 20 Q. Ms. Powell has provided sworn testimony that she considered Eric Coomer to be quote, a gnat, G-N-A-T. 24 Why wouldn't pour take action on intellige	17		17	Tour, did you ever learn anything new about Eric Coomer?
20 a photo of him standing here with me. 21 That would be pretty good. 22 Q. And it's important for intelligence to be 23 actionable, because if it's not, people could get hurt, 24 right? 25 A. Are you asking that as, you know, from a 26 Page 142  1 lawyer's perspective? 2 Q. Let me rephrase that. 3 A. I'm not sure what you're asking me. 4 Q. Let me rephrase that. 4 Q. Let me rephrase that. 5 poorly-worded question. 6 In your experience in the military, 7 intelligence needed to be actionable in order to act on 8 it. Is that a fair statement? 8 A. Well, there's things you do on a battlefield 9 A. Well, there's things you do on a battlefield 10 that are as long as they are within the rules of 11 engagement and the laws of war, that would not 12 necessarily be something that you would, you know, have 13 to go to court over, I mean in terms of what you are 14 talking about. I mean, there's things that you do on a 15 battle field with intelligence that could result in the 16 death of somebody, and it may not be 100 percent. 17 Q. Sure. But you stated that intelligence needed to be actionable. And why is that? 20 Q. Were you aware that I wasuit? 21 Why wouldn't you take action on intelligence that could result in the 22 been verified by a good source - 23 MR. GREAVES: Form. And just the relevance 24 of this is getting to the point and we put 25 we've tolerated a lot of irrelevant questions here, 26 A. I don't recall may in the center of my 27 attention. 28 A. I don't remember if I learned anything new 29 A. I don't remember if I learned anything new 20 A. Not unless I no, I really wasn't. No. 20 A. Not unless I no, I really wasn't. No. 21 Page 144 22 A. I don't remember if I learned anything new 24 about him. He wasn't certainly the center of my 25 about time. 26 A. Not unless I no, I really wasn't. No. 27 A. Not unless I no, I really wasn't. No. 28 A. I'm ow liming. 29 A. I'm ow unser that bases may in the was an internon. 30 A. I'm ow unser that bases may in the was an internon. 31 A. I'm aw				And I'm talking about the first six months of December
21 That would be pretty good. 22 Q. And it's important for intelligence to be 23 actionable, because if it's not, people could get hurt, 24 right? 25 A. Are you asking that as, you know, from a 26 Page 142  1 lawyer's perspective? 2 Q. Let me rephrase that. 3 A. I'm not sure what you're asking me. 4 Q. Let me rephrase that. That was a very 5 poorly-worded question. 6 In your experience in the military, 6 intelligence needed to be actionable in order to act on 8 it. Is that a fair statement? 9 A. Well, there's things you do on a battlefield 10 encessarily be something that you would, you know, have 11 engagement and the laws of war, that would not 12 necessarily be something that you would, you know, have 13 to go to court over, I mean in terms of what you are 14 talking about. I mean, there's things that you do on a 15 battle field with intelligence that could result in the 16 death of somebody, and it may not be 100 percent. 17 Q. Sure. But you stated that intelligence needed 18 to be verified by a good source — 19 A. Uh-huh (Affirmative response). 20 Q. — for it to be actionable. And why is that? 21 Why wouldn't you take action on intelligence that could resides. 22 MR. GREAVES: Form. And just — the relevance 23 of this is getting to the point — and we put — 24 of this is getting to the point — and we put — 25 we've tolerated a lot of irrelevant questions here, 26 don't remember the date. 27 don't receil rath. He wasn't certainly the center of my attention. 28 about him. He wasn't certainly the center of my about Inman. 29 Q. So you weren't making any effort to leam about him. 20 Q. So you weren't making any effort to leam about him. 21 About him. He wasn't certainly the center of my about Impace about that about head about him. 29 Q. Mere you awere that Enic Coomer to He note, a pan, G-N-A-T. 30 Q. Were you aware that I'making any effort to leam about him. 4 A. Not unless I — no, I really wasn't. No.  Page 144  2 A. Not unless I— no, I really wasn't. No.  Page 144  2 A. Not unless I— no, I really wasn't. No.	19	· · · · · · · · · · · · · · · · · · ·	s 19	2021.
22 Q. And it's important for intelligence to be 23 actionable, because if it's not, people could get hurt, 24 right? 25 A. Are you asking that as, you know, from a 26 Page 142  1 lawyer's perspective? 2 Q. Let me rephrase that. 3 A. I'm not sure what you're asking me. 4 Q. Let me rephrase that. That was a very 5 poorly-worded question. 6 In your experience in the military, 7 intelligence needed to be actionable in order to act on 8 it. Is that a fair statement? 9 A. Well, there's things you do on a battlefield 10 that are — as long as they are within the rules of 11 engagement and the laws of war, that would not 12 necessarily be something that you would, you know, have 13 to go to court over, I mean in terms of what you are 14 talking about. I mean, there's things that you do on a 15 battle field with intelligence that could result in the 16 battle field with intelligence that could result in the 17 Q. Sure. But you stated that intelligence needed 18 to be verified by a good source — 19 A. Uh-huh (Affirmative response). 20 Q. — for it to be actionable. And why is that? 21 Why wouldn't you take action on intelligence that could result of the risks? 22 Of this is getting to the point — and we put — 25 we've tolerated a lot of irrelevant questions here, 26 attention. 27 A. Not unless I — no, I really wasn't. No. 28 A. Not unless I — no, I really wasn't. No. 29 A. Not unless I — no, I really wasn't. No. 29 A. Not unless I — no, I really wasn't. No. 20 A. Not unless I — no, I really wasn't. No. 20 A. Not unless I — no, I really wasn't. No. 20 A. Not unless I — no, I really wasn't. No. 20 A. Not unless I — no, I really wasn't. No. 20 A. Not unless I — no, I really wasn't. No. 21 A. Not unless I — no, I really wasn't. No. 22 A. I have no opinion about that. 23 A. Not unless I — no, I really wasn't. No. 24 A. Not unless I — no, I really wasn't. No. 25 A. Not unless I — no, I really wasn't. No. 26 A. Not unless I — no, I really wasn't. No. 27 A. Not unless I — no, I really wasn't. No. 28 A. I don't recall that Lawait i	20	a photo of him standing here with me.	20	A. I don't remember if I learned anything new
23 actionable, because if it's not, people could get hurt, right?  24 right?  25 A. Are you asking that as, you know, from a Page 142  26 Page 142  1 lawyer's perspective?  2 Q. Let me rephrase that.  3 A. I'm not sure what you're asking me.  4 Q. Let me rephrase that. That was a very  5 poorly-worded question.  6 In your experience in the military,  7 intelligence needed to be actionable in order to act on  8 it. Is that a fair statement?  9 A. Well, there's things you do on a battlefield  10 that are as long as they are within the rules of  11 encessarily be something that you would, you know, have  12 necessarily be something that you would, you know, have  13 to go to court over, I mean in terms of what you are  14 tatking about. I mean, there's things that you do on a battle field with intelligence that could result in the  15 death of somebody, and it may not be 100 percent.  16 Q. Sure. But you stated that intelligence needed  17 do Sure. But you stated that intelligence needed  18 to be verified by a good source  19 A. Uh-huh (Affirmative response).  10 Q for it to be actionable. And why is that?  20 Mre you aware that Inewsit a Now and that Newsmax settled. I am. But I  21 don't remember the date.	21		21	about him. He wasn't certainly the center of my
24 right? 25 A. Are you asking that as, you know, from a Page 142  1 lawyer's perspective? 2 Q. Let me rephrase that. 3 A. I'm not sure what you're asking me. 4 Q. Let me rephrase that. That was a very 5 poorly-worded question. 6 In your experience in the military, 6 intelligence needed to be actionable in order to act on 8 it. Is that a fair statement? 9 A. Well, there's things you do on a battlefield 10 engagement and the laws of war, that would not 11 engagement and the laws of war, that would not 12 to go to court over, I mean in terms of what you are 13 to go to court over, I mean in terms of what you are 14 talking about. I mean, there's things that you do on a 15 battle field with intelligence that could result in the 16 death of somebody, and it may not be 100 percent. 17 Q. Sure. But you stated that intelligence needed 18 to be verified by a good source — 19 A. Uh-huh (Affirmative response). 20 Q. — for it to be actionable. And why is that? 21 Why wouldn't you take action on intelligence that hadn't 22 been verified by a good source? What are the risks? 23 MR. GREAVES: Form. And just — the relevance 24 of this is getting to the point — and we put — 25 we've tolerated a lot of irrelevant questions here, 26 A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. Not unless I — no, I really wasn't. No.  Page 144  A. I'm a ware that Eric Coomer to donout that.  Sound find as considered Eric Coomer to be quote, a gnat, G-N-	22	Q. And it's important for intelligence to be	22	attention.
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Page 142    1   lawyer's perspective?   1   Q. Ms. Powell has provided sworn testimony that   2   Q. Let me rephrase that.   2   she considered Eric Coomer to be quote, a gnat, G-N-A-T.   3   A. I'm not sure what you're asking me.   3   Would you share that assessment, that he was an   inconsequential figure?   5   poorly-worded question.   5   A. I have no opinion about that.   Q. And you know that Eric Coomer sued Sidney   7   intelligence needed to be actionable in order to act on   7   Powell for defamation on December 20 of 2020, right?   8   A. I don't recall that. You know, I understood   that are as long as they are within the rules of   10   I can't say whether it was Coomer or whomever, but I   engagement and the laws of war, that would not   11   engagement and the laws of war, that you know, have   12   Q. Were you aware that Eric Coomer had filed a   defamation lawsuit against you just answered with   talking about. I mean, there's things that you do on a   14   respect to Ms. Powell, but that that lawsuit also named   battle field with intelligence that could result in the   15   Rudy Giuliani, the Trump Campaign, Newsmax, OAN,   death of somebody, and it may not be 100 percent.   16   Michelle Malkin, Eric Mataxes, The Gateway Pundit, Jim   4   A. Probably from the media.   Q. Were you aware that Newsmax settled with Dr.   20   Mr. GREAVES: Form. And just the relevance   23   Coomer in April of 2021?   A. I'm aware that Newsmax settled. I am. But I   we've tolerated a lot of irrelevant questions here,   25   don't remember the date.   4   A. I'm aware that Newsmax settled. I am. But I   4   don't remember the date.   4   A. I'm aware that Newsmax settled. I am. But I   4   don't remember the date.   4   A. I'm aware that Newsmax settled. I am. But I   4   don't remember the date.   4   A. I'm aware that Newsmax settled. I am. But I   4   don't remember the date.   4   A	24	right?	24	about him?
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Page 143 Page 145	25	we've tolerated a lot of irrelevant questions here,	25	don't remember the date.
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	Q. Did you see the on-air retraction that they	1	BY MR. KLOEWER:
2	posted?	2	Q. Okay. So there you are telling Mr. Strang
3	A. I don't recall if I did.	3	that election integrity and strengthening our system is
4	Q. So you are not aware or you don't recall	4	the No. 1 priority of the Tour. Would you disagree with
5	seeing Newsmax apologize to Eric Coomer for the harm		that?
6	they had caused?	6	MR. GREAVES: Objection to form and
7	A. I I have been on Newsmax, but I don't watch	7	completeness.
8	a lot of I don't watch a lot of Newsmax. So no, I	8	THE WITNESS: Yeah. I I mean, I don't
9	don't recall seeing it.	9	object to anything I said. I think that's a great
10	Q. We talked about a little bit before about the	10	education and that people ought to be teaching that
11	purposes of the Tour when it got started in 2021 and the	11	to every kid in this country.
12	various different topics that are covered. But this	12	BY MR. KLOEWER:
13	question of election security was, in fact, the number	13	Q. So how did Mr. Oltmann's claims that Eric
14	one reason why the Tour was established, wasn't it?	14	Coomer rigged the election, how did they advance
15	MS. WEISS: Object to the form.	15	those those objectives?
16	THE WITNESS: I don't believe it was, no, I	16	A. Say that again?
17	don't believe it was.	17	Q. How did Mr. Oltmann's claims on the Tour serve
18	BY MR. KLOEWER:	18	the objectives of increasing election integrity?
19	Q. Let's do this, let's take a look at what we	19	A. You're making a big you're making a big
20	will label as Exhibit 19, Clip 5. This is an interview	20	leap. I mean, that Oltmann wasn't the center of my
21	you conducted with Stephen Strang on August 11th of	21	attention at all. I mean, I you know, he when I
22	2021. So this is just a couple weeks after Joe	22	made that more than likely when I made that
23	Oltmann's first appearance on the Tour. And we already		statement and I'm speculating here but when I
24	watched those clips where he tells his story about Eric	24	talked to him on that show, Joe Oltmann was the furthest
25	Coomer. But let's take a quick look at this video where Page 146	25	thing from my mind and probably the same thing with Page 148
1	you are describing the purpose of the Tour to	1	your with your client there, Coomer. I mean, I don't
2	Mr. Strang.	2	think about them every second of the day or at all, to
3	(A video clip was played as follows:)	3	be honest when you.
4	AN INDIVIDUAL: Do you and Clay and the other	4	Q. Well, maybe the answer maybe that's the
	leaders have specific goals that you hope will		
5		5	answer, is the inverse, is that Joe Oltmann's claims
5 6	result from these this tour that you're on?	5 6	answer, is the inverse, is that Joe Oltmann's claims don't advance election integrity. Would you agree with
6	result from these this tour that you're on?	6	don't advance election integrity. Would you agree with
6 7	result from these this tour that you're on?  MR. FLYNN: Yes, yes. So the specific goals	6 7	don't advance election integrity. Would you agree with that?
6 7 8	result from these this tour that you're on?  MR. FLYNN: Yes, yes. So the specific goals are a much greater understanding and awareness of	6 7 8	don't advance election integrity. Would you agree with that?  MR. GREAVES: Objection, form.
6 7 8 9	result from these this tour that you're on?  MR. FLYNN: Yes, yes. So the specific goals are a much greater understanding and awareness of our election security and our election system in	6 7 8 9	don't advance election integrity. Would you agree with that?  MR. GREAVES: Objection, form.  THE WITNESS: Yeah, I mean, I I don't
6 7 8 9 10	result from these this tour that you're on?  MR. FLYNN: Yes, yes. So the specific goals are a much greater understanding and awareness of our election security and our election system in this country, and then what people can specifically	6 7 8 9 10	don't advance election integrity. Would you agree with that?  MR. GREAVES: Objection, form.  THE WITNESS: Yeah, I mean, I I don't you know, it's just yeah. I mean, it's like,
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1	what the hell else I said on that one. But we have	1	Q. And you believe that when people publish lies
2	a lot of people that speak on the Tour that talk	2	against others, they should be held accountable for
3	about a variety of issues. Election integrity is	3	those lies, correct?
4	one of them and election security is one of them,	4	A. I wish that was the case, but that's not
5	you know. And it's evolved over time. But and	5	always the case.
6	there's a lot of topics that we talk about.	6	Q. That's not my question. You believe that
7	BY MR. KLOEWER:	7	people should be held accountable when they publish lie
8	Q. It sounds like you're not willing to say that	8	about others, right?
9	Mr. Oltmann's presentations advance the cause of	9	A. Yes, I do. I do believe that. But that's not
10	election integrity, are you?	10	always the case.
11	MS. WEISS: Object to form. Argumentative.	11	Q. And that's why you that's why you are
12	THE WITNESS: Do you want to restate your	12	pursuing defamation claims of your own, right?
13	question? Because I it is. I think it is. I	13	A. Yes.
14	feel like we are debating about Joe Oltmann and	14	Q. Because in your own personal experience you
15	versus something other than Joe Oltmann. So I just	15	know that published lies have caused or you've
16	don't understand what you're trying to get at here.	16	alleged at least that those have caused you harm,
17	BY MR. KLOEWER:	17	correct?
18	Q. Well, how does claiming that a Dominion	18	A. Yes.
19	employee rigged the election advance	19	Q. And you think you should be compensated for
20	A. Okay. Are you saying that I I'm sorry to	20	the harm that you have been caused by lies published by
21	cut in on you, because you asked me not to when you	21	others, right?
22	talk. But are you implying that I am saying that about	22	A. Not necessarily.
23	Joe Oltmann in this statement, or about, you know, the	23	Q. Okay. Well, then why are you pursuing your
24	employee of Dominion in this statement that I'm making	24	own defamation lawsuits if you don't
25	on the Strang report?	25	A. I wish that people would just, you know,
	Page 150		Page 152
1	Q. No, no. I'm asking about Oltmann's statements	1	just would basically just shut their mouths about
2	on the Tour. Do you believe that they advance the cause	2	what what they say about something unless they have
3	of election integrity, and if so, how?	3	met them and engage them. I mean, some of the people
4	A. You know what? I don't remember Joe Oltmann,	4	that we're talking about in my specific cases, these are
5	any of the speeches that he gave. I don't recall	5	people that I have never even met. You know, if they
6	anything specifically that he said. I just I just	6	had met me and I was a jerk to them, then they can call
7	don't.	7	me a jerk. But most of these people I have never even
8	Q. Well, you know what he said now because we've	8	met.
9	just watched the videos, right?	9	Q. Do you know if Clay Clark has ever met Eric
10	A. I do, yeah, from today.	10	Coomer?
11	Q. And as you sit here today, can you think of	11	A. I don't know.
12	any way that Joe Oltmann's claims about Eric Coomer	12	Q. Do you know if Joe Oltmann has ever met Eric
13	advance the causes of securing elections?	13	Coomer?
14	A. I don't. I mean I mean, I don't you	14	A. No idea.
15	know, I think it's I'm trying to decide whether it's,	15	Q. And I think we have established, you haven't
16	you know, apples and refrigerators here. I'm not sure	16	read any of the complaints filed by Eric Coomer,
17	that what you're asking me to see and speculate about	17	correct?
18	have anything to do with what you're what you're	18	A. I don't recall if I read any of them.
19	implying.	19	Q. Are you aware that Dr. Coomer has provided
20	Q. You've filed several defamation lawsuits of	20	sworn testimony that he has received death threats as a
21	your own, correct?	21	result of these claims about him?
22	A. And what does that have to do with this?	22	A. I'm not.
23	Q. Well, from the 30,000-foot view is you would	23	Q. You would agree that receiving death threats
24	agree that lying is wrong, right?	24	on the basis of a lie is a significant harm, correct?
25	A. I do.	25	A. Absolutely.
	Page 151		Page 153

1	Q. And you would agree that individuals or	1	Okay. Sorry.
2	entities that are responsible for causing that kind of	2	All right. So I'm going to scroll down here
3	harm should be held accountable for it, right?	3	to the document requests. We don't need to go through
4	MS. WEISS: Object to form.	4	all of the definitions and instructions and all that
5	THE WITNESS: What are you asking me?	5	information. Do you recall that we requested a variety
6	BY MR. KLOEWER:	6	of documents from you?
7	Q. I'm just confirming that you would agree that	7	A. I I assume you did, yeah.
8	people who are responsible for that kind of harm should	8	Q. I want to just go through these here to ensure
9	be held accountable.	9	that any documents that are responsive have been
10	A. I do believe that, yeah. I think that they	10	produced. So
11	especially that kind of stuff, yeah.	11	A. Uh-huh (Affirmative response).
12	MR. KLOEWER: Okay. I'm going to shift gears	12	Q the first item we requested here is all
13	here. If we could go off the record for like five	13	written communications relating to Dr. Coomer between
14	or 10 minutes, and we will hop back on on a new	14	you and Clay Clark, Make Your Life Epic doing business
15	line of questioning. Does that work for everybody?	15	as the Thrivetime Show, or anyone acting on its behalf.
16	Would that be great?	16	Can you tell me, when you're communicating
17	MR. GREAVES: Sure. Do you have just an ETA	17	with the Thrivetime Show or the Tour, as you understand
18	of how far you think you are are you like	18	the Tour in the broad sense, who do you communicate with
19	halfway done? Three quarters?	19	or
20	MR. KLOEWER: Closer to three quarters	20	A. I communicate
21	probably.	21	Q. I'm sorry. Go ahead.
22	Nate, can you give us a time, a time stamp	22	A. I communicate with Clay.
23	there? Or we can go off the record first.	23	Q. Okay. Only Clay?
24	THE VIDEOGRAPHER: Yes. Let's go off the	24	A. 99.9 percent of the time.
25	record.	25	Q. Okay. Is there anyone else with the Tour that
	Page 154		Page 156
1	The time now is 2:24 p.m. We are going off	1	you have communicated with on tour business? For
2	the record. And this is the End of Media Unit 3.	2	example, Vanessa Clark or Aaron Antis or any other folks
3	(A recess was had at 2:24 p.m. to 2:35 p.m.)	3	like that?
4	THE VIDEOGRAPHER: The time now is 2:35 p.m.	4	A. I know them, and I have spoken to them or
5	We are on the record. And this is the beginning of	5	communicated with them, but not I mean, related to,
6	Media Unit No. 4. You may proceed.	6	you know, other things, not necessarily the Tour.
7	BY MR. KLOEWER:	7	Q. And this request pertains to communications
8	Q. All right. Mr. Flynn, I want to take a look	8	relating to Dr. Coomer. It sounds like from your
9	now, if we could shift gears a bit, to take a look at	9	testimony before and correct me if I'm wrong have
10	the subpoena that was issued in this case.	10	you ever discussed Dr. Coomer with Clay Clark?
11	Let me pull that up and share my screen, one	11	A. I believe I have. Yeah, I believe I have.
12	moment here. We'll mark this as Exhibit 27.	12	Q. Okay. And what was the nature of those
13	(Exhibit 27, Deposition notice, was marked for	13	conversations?
14	identification.)	14	A. We've talked about I think on his podcast,
15	BY MR. KLOEWER:	15	Clay's podcast, he's shown the incident on his podcast
16	Q. Okay. Can you see the document there on my	16	where Coomer drives his car into a building.
17	screen, Mr. Flynn?	17	Q. Okay. Anything other than that?
18	A. I can see it, yes.	18	A. I don't I don't think so. I mean, I don't
19	Q. Okay. Great. Do you recognize this document?	19	recall anything else.
20	A. I don't.	20	Q. Did Mr. Clark ever request that you utilize
21	Q. Okay. I'll just represent we see the case	21	some of your resources to try to determine whether these
22	caption at the top here. It's a notice of intent to	22	claims about Eric Coomer were true?
23	take oral and video deposition. This is the subpoena	23	MS. WEISS: Form.
24	that was issued in this case, and it includes	24	BY MR. KLOEWER:
25	Am I still on screen? No.	25	Q. To clarify, I'm referring to the claims that
	Page 155		Page 157

		1	
1	he partook on this call, that he claimed that he had	1	information, any evidence, anything that would suggest
2	rigged the election, and that he did rig the election.	2	that Dominion Voting Systems or related to Dominion
3	Has he ever requested that you investigate this?	3	Voting Systems at all, if Mr. Clark has ever requested
4	MS. WEISS: Object to form.	4	that from you. Is that correct?
5	THE WITNESS: I don't recall if he's ever done	5	A. I don't recall if he has. I don't I don't
6	that. I don't believe he's ever done that. I	6	remember if he had at all.
7	don't recall if he has. I don't remember him	7	Q. And we discussed No. 3 previously a bit. But
8	asking me to do anything of that nature.	8	just to confirm, we requested all communications with
9	BY MR. KLOEWER:	9	Joseph Oltmann or anyone acting on his behalf.
10	Q. Well, do you have resources that would allow	10	Have you ever been in direct contact with Mr.
11	you to investigate whether this claim is true or not?	11	Oltmann?
12	A. Like, a claim about what? What are you	12	A. I don't I don't recall if I ever have.
13	talking about?	13	Q. Have you
14	Q. Well, you know, we have already established,	14	A. I mean, I've bumped onto I've bumped into
15	obviously, you are a top-ranking military intelligence	15	him at events, that kind of if I remember right.
16	officer	16	Q. Have you ever e-mailed, sent e-mails with him?
17	A. I got I got all that, Brad. Don't	17	A. I don't recall if I ever have.
18	patronize me, please.	18	Q. Are you familiar with an entity called FEC
19	Q. I'm not	19	United?
20	A. Okay. I mean, you're asking me what? Do I	20	A. I don't I don't believe I am, no. What
21	have investigative resources to investigate somebody?	21	does it stand for?
22	Q. Yes.	22	Q. It's Oltmann's local organization. The
23	A. I don't. I don't have anything that I that	23	acronym FEC stands for Faith, Education, and Commerce.
24	I, you know, that I own or anything that I I don't.	24	It's a political organization that Mr. Oltmann has
25	I mean, I'm not an investigator.	25	started here in Colorado. Does that sound familiar?
	Page 158		Page 160
1	Q. Did you ever discuss your	1	A. It doesn't.
2	Well, let's see here. So the point being, Mr.	2	Q. Okay. Did you ever speak at any of his events
3	Clark has never tried to take advantage of your	3	that you recall?
4	experience or resources to try to determine whether	4	A. I I don't believe I have. I mean, I don't
5	these claims are true or not. Is that fair?	5	know if, you know, if I was invited some place.
6	A. Yeah, that's fair.	6	Sometimes there's organizations that underwrite
7	MS. WEISS: Object to the form.		
		7	different things. But I don't believe I've ever spoken
8	THE WITNESS: That's fair. I mean, I don't	7 8	different things. But I don't believe I've ever spoken at something like that or with that name.
8 9			•
	THE WITNESS: That's fair. I mean, I don't	8	at something like that or with that name.
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1	A. I don't know if I have ever met him.	1	employment contract with the Tour. Is that something
2	Q. And just going back briefly with respect to	2	that you could locate?
3	Mr. Clark, what's the most typical means by which you	3	MR. GREAVES: Object to the form.
4	communicate with him? Is that by text message? By	4	MS. WEISS: Object to the form. That
5	e-mail? What's the typical	5	misstates his testimony.
6	A. Normally by text.	6	MR. GREAVES: Yeah. I was just going to say,
7	Q. Okay. And is that a normal text app that you	7	I think he talked about a contract but not an
8	have on your phone, or is that more through like a	8	employment contract.
9	Signal app or	9	THE WITNESS: Yeah.
10	A. No, normal. Normal. Normal text, just	10	BY MR. KLOEWER:
11	regular iPhone text.	11	Q. Well, I apologize if I misspoke. I believe
12	Q. Do you ever communicate with Mr. Clark via	12	you stated that your contract included reference to
13	Signal?	13	compensation, correct?
14	A. I don't believe I ever have. I don't think I	14	A. I do.
15	ever have. Normally it's just regular text and share	15	Q. Okay.
16	links, stories, information, stuff like that.	16	A. I did. I did. Yeah.
17	Q. Moving down to No. 4, All documents or	17	Q. Okay. And is that contract something that is
18	communications authored, sent or received by you	18	in your possession today?
19	relating to any appearances by Oltmann on the Tour.	19	A. It's not in my possession today. If I
20	We discussed this already when we were looking	20	Q. Well, in the general today, not sitting in
21	at the video clips before, but when Oltmann was was	21	front of you at this moment. But you have possession of
22	removed from the Tour, apparently for lack of insurance	, 22	that contract, correct?
23	I realize you don't have any insight into that, but I	23	A. I probably could find it, yeah. If I dig
24	just want to confirm, did you have any conversations	24	back, if I you know, I could probably find it.
25	with Mr. Clark at that time about why he was no longer Page 162	25	MR. GREAVES: It didn't come up in my search. Page 164
1	on the show or on the Tour?	1	THE WITNESS: Yeah, yeah.
2	A. Yeah, I don't I don't recall that I did.	2	MR. GREAVES: If we've got it, we will get it
3	Q. And as far as on the other end of the spectrum	3	to you.
4	when Oltmann was brought on to the Tour in the first	4	THE WITNESS: Yeah, yeah. If we have it,
5	instance, do you recall conversations you had deciding	5	we'll get it to you. It's not but it, you know,
6	whether or not he should be granted a spot on the Tour?	6	it's been so long.
7	A. I don't remember if I was if I was in a	7	BY MR. KLOEWER:
8	position to do that. I just have no knowledge of that.	8	Q. Great. We will follow up with your counsel on
9	Q. Do you typically communicate via text or	9	that.
10	e-mail with Mr. Clark to discuss potential speakers on	10	And this referred to pay stubs as well for
11	the Tour and whether they should be allowed on?	11	your speaking engagements. I believe you stated before
12	A. Yes, texts. Sometimes we do, yeah.	12	that any payment you received for your speaking
13	Q. And did you search your text messages to see	13	engagements would go through Resilient Patriot; is that
14	if you had communications with Mr. Clark about Mr.	14	correct?
15	Oltmann?	15	A. Yeah. We would invoice we would invoice
16	A. I mean, that's I think Jason, you guys, you	16	Clay.
17	know, did a very you know, my lawyers did a very	17	Q. And do you know, is there would you work
18	thorough search to address all the questions that you	18	with Ms. Clark, Vanessa Clark on that compensation, or
19	are going through.	19	does that all go through Clay Clark?
20	Q. Number 5. We requested documents and	20	A. I mean, however they do it. I mean, we would
21	communications authored, sent, or received by you	21	invoice Clay and that would get paid.
22	concerning any compensation for your employment, time,	22	Q. When you say "invoice Clay," is that an e-mail
23	expertise, including any contracts, pay stubs, text	23	to who? Is it to his personal e-mail?
24	messages, or e-mails.	24	A. I'd have to I'd have to go. I mean, it's
	5		
25	You mentioned earlier that you have an	25	a no, it would be like Thrivetime or something like

1	that, if I remember right.	1	Q. Did you have discussions about the corporate
2	Q. Number 6. We requested any documents or	2	structure of the Tour? Were you involved, for example,
3	communications relating to the establishment of the	3	in discussions about starting Reopen America, LLC, and
4	Tour. That included, you know, discussing the purpose,	4	what its purpose would be?
5	financing, corporate structure, business plan, things of	5	A. I don't recall if I ever had anything like
6	that nature.	6	that. I don't believe I did.
7	We didn't really get into detail too much	7	Q. Business plan. Did you ever see anything like
8	earlier about how specific your conversations were in	8	that, you know, the target revenue sales or, you know,
9	the beginning. Did you was it just you and Clay that	9	any proposals of ways to generate revenue, things of
10	were sort of kicking around ideas for this, or were	10	that nature?
11	other people involved in brainstorming what the Tour	11	A. I don't believe so, but I don't recall.
12	might look like?	12	Q. Let's look at No. 7 here. And I believe you
13	A. I I don't know other conversations that	13	may have already answered this question already, but
14	Clay may have had with other people that he knew, but my	14	just to be certain. Documents relating to tour's
15	guess is he probably spoke to a lot of people, and I was	15	finances, including business plan that we just
16	one of them.	16	discussed, profit and loss statements, bank statements,
17	Q. Were you a party to the conversations with	17	general ledger reports.
18	Clay and any additional third parties about the	18	Are you involved with the Tour on that end of
19	formation of the Tour?	19	things in any way?
20	A. We've talked about I don't know about the	20	A. No.
21	formation of it, but I know we've since we have been	21	MS. WEISS: Brad, I'm going to object to this
22	doing it, we have had different conversations with	22	because of the order we got in December on
23	different people about, you know, how much how much	23	finances. The magistrate judge made it pretty
24	fun it is and doing doing the various events and	24	clear that the only discovery you can do into the
25	talking about the events. So, I mean, I wouldn't say	25	Tour's financing, the finances, is related to
	Page 166		Page 168
1	about formation. It sounds like you know, I just	1	statements that were specifically about your client
2	don't have any knowledge of that.	2	and Mr. Oltmann.
3	Q. But you can't identify anybody other than	3	So I know he's already produced the documents
4	yourself and Mr. Clark who were who founded the Tour?	4	that he has, and I don't think he has any anyway.
5	MR. GREAVES: Objection to form, foundation.	5	But the line of questioning about financing I'm
6	THE WITNESS: I mean, not really. I mean, I	6	going to object to.
7	don't really have I mean, I can't answer because	7	MR. KLOEWER: Understood. I'm just trying to
8	I really don't have any knowledge about that.	8	understand what sorts of documents may exist and
9	BY MR. KLOEWER:	9	trying to determine if documents that could be
10	Q. And what about the discussions about financing	10	responsive and appropriately disclosed under the
11	the Tour on the front end? What was your understanding	11	Court's order are out there that we should be
12	of who was going to pay for all this?	12	requesting.
13	A. Honestly, I don't know. I mean, I think it	13	So, but I understand Mr. Flynn doesn't play an
14	was, you know, let's see let's see if we can sell	14	active role in the financial side of things, so we
15	some tickets, I guess. I mean, that seems to work. You	15	can we can proceed here.
16	know, I know we worked hard to do that.	16	BY MR. KLOEWER:
17	Q. But as far as before the tickets are sold, who	17	Q. Number 8. Tour tax returns. I'm anticipating
18	did you understand was going to be paying to, you know,	18	Ms. Weiss's objection on that as well.
19	reserve the venue, to advertise, things of that nature?	19	So we'll skip to No. 9. Well, No. 9 falls
20	A. I don't know. I don't know	20	under the umbrella of that objection as well.
21	that level of detail.	21	Do you have any communication with the Tour's
22	Q. Do you know if Clay Clark is paying for this	22	bookkeepers or accountants, Mr. Flynn?
23	out of pocket from his personal funds, or are there	23	A. I don't. And I know that, you know, my
24	investors that you are aware of?	24	lawyers did a thorough, thorough review of everything
25	A. I don't know.	25	that you're asking me and gave you what everything we
	Page 167		Page 169

1	we, you know, that we were asked to give. So I'm	1	do, I don't know.
2	confident that what exists, you have.	2	Q. Getting down to these last few requests.
3	Q. Number 10 pertains to ticket sales. And I	3	We requested all communications with Sidney
4	know you are not involved on that side of things, so I	4	Powell or anyone acting on her behalf relating to Eric
5	just wonder if you know, it strikes me that you would	5	Coomer or Dominion Voting Systems.
6	have conversations going into an event to know whether	6	We have seen many of those communications and
7	it's sold out or not or how many tickets are left. Do	7	discussed them today. Can you just confirm for me? We
8	you have those types of conversations as you head into	8	looked at a couple e-mail addresses you used to
9	an event?	9	communicate with Ms. Powell. We have the zulutym@gmail,
10	A. Absolutely.	10	the flynn@resilientpatriot. Are there any other e-mail
11	Q. And how do those conversations typically play	11	addresses you have used in your communications with her?
12	out? Are they in person, on the phone, text messages?	12	A. I don't believe so. And I know, you know,
13	A. On the phone, on a podcast when we are, you	13	we've provided a bunch of stuff related to this. You
14	know, trying to sell tickets and trying to figure out	14	know, obviously, she remained my attorney, so there's
15	whether you know, what kind of things we	15	that privilege for other stuff that, you know, that
16	Clay gives away a lot of stuff to get people	16	we're involved in. But that's that's those are
17	to buy. You know we do we do back backstage	17	the primary e-mail addresses.
18	passes for I mean, he gives tickets away, literally	18	Q. Do you ever text message with Ms. Powell?
19	gives tickets away, because, you know, we want to he	19	A. Back then?
20	sells them for he doesn't even sell tickets	20	Q. Then or now.
21	sometimes. Sometimes he just gives them away.	21	A. Then, yeah. Not lately. Not lately.
22	Q. So do you are you in, for example, group	22	Q. Are you still in contact with Ms. Powell?
23	chats or on Google Documents saying, you know, we've got	23	A. Generally.
24	110 tickets left	24	Q. How frequently would you say you speak with
25	A. No.	25	her these days?
	Page 170		Page 172
1	Q to sell for this event? Things of that	1	A. More infrequently these days. More
2	nature?	2	infrequently.
3	A. No. Usually it's just a it's on a podcast,	3	Q. Is she still representing you on any legal
4	where we're selling them on a podcast or, you know, when	4	matters?
5	he and I speak, and, you know, how are we doing. But,	5	A. No.
6	you know, he'll tell me, Hey, it looks like we are sold	6	Q. With respect to Patrick Byrne, I don't believe
7	out again, you know. Which is nice, you know. So	7	we have seen any communications. How do you communicate
8	Q. Do you have access to any sort of ticket sale	8	with Mr. Byrne?
9	tracking mechanism in realtime? So like, for example,	9	A. Generally text, sometimes a phone call,
10	if you wanted to see how many tickets were left for the	10	sometimes face-to-face.
11	next event, can you is there a platform you can	11	Q. And you've discussed Eric Coomer with Patrick
12	access to that get that information?	12	Byrne, right?
13	A. For the ReAwaken Tour?	13	A. I don't recall if I ever have. It's you
14	Q. Yeah.	14	know, he's the center of your attention, not the center
15	A. No.	15	of my attention.
16	Q. Who would have that access?	16	Q. Well, again, the reason I ask this, you know,
17	Q. Who would have that access.		
1	MS. WEISS: Objection, foundation.	17	it seems like many people in your circle have been sued
18	-	17 18	it seems like many people in your circle have been sued by Eric Coomer. Sidney Powell, Patrick Byrne, The
18 19	MS. WEISS: Objection, foundation.		
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19	MS. WEISS: Objection, foundation. THE WITNESS: You've got me. BY MR. KLOEWER:	18 19	by Eric Coomer. Sidney Powell, Patrick Byrne, The America Projects. And you have never you have never
19 20	MS. WEISS: Objection, foundation.  THE WITNESS: You've got me.  BY MR. KLOEWER:  Q. Is there anyone affiliated with the Tour that	18 19 20	by Eric Coomer. Sidney Powell, Patrick Byrne, The America Projects. And you have never you have never communicated with them about him? Is that your
19 20 21	MS. WEISS: Objection, foundation.  THE WITNESS: You've got me.  BY MR. KLOEWER:  Q. Is there anyone affiliated with the Tour that you know, other than Mr. Clark, who sort of administers	18 19 20 21	by Eric Coomer. Sidney Powell, Patrick Byrne, The America Projects. And you have never you have never communicated with them about him? Is that your testimony today?
19 20 21 22	MS. WEISS: Objection, foundation.  THE WITNESS: You've got me.  BY MR. KLOEWER:  Q. Is there anyone affiliated with the Tour that you know, other than Mr. Clark, who sort of administers the ticket sale aspect of operations?	18 19 20 21 22	by Eric Coomer. Sidney Powell, Patrick Byrne, The America Projects. And you have never you have never communicated with them about him? Is that your testimony today?  A. I have I don't recall if I have. I mean,
19 20 21 22 23	MS. WEISS: Objection, foundation.  THE WITNESS: You've got me.  BY MR. KLOEWER:  Q. Is there anyone affiliated with the Tour that you know, other than Mr. Clark, who sort of administers the ticket sale aspect of operations?  A. I mean, I know a lot of a lot of the young	18 19 20 21 22 23	by Eric Coomer. Sidney Powell, Patrick Byrne, The America Projects. And you have never you have never communicated with them about him? Is that your testimony today?  A. I have I don't recall if I have. I mean, I'm aware of, you know, a lot of stuff because of what's

1	Q. Did Mr. Byrne ever ask you if you had any	1	as well, correct?
2	information about Eric Coomer to share with him?	2	A. Well, I don't know that it was I can't
3	A. I don't remember him asking me any of that.	3	I'm not going to sit here and tell you that it was
4	Q. Did you review your text messages with Mr.	4	that I'm aware that it was Coomer, but I know that
5	Byrne to see if you had anything responsive to this	5	Dominion has. That's what I that's what I believe.
6	request?	6	Q. Okay. Well, Dr. Coomer has filed a lawsuit
7	A. I know that my lawyers reviewed, you know, the	7	against Mike Lindell. Is this the first that you have
8	requests and went through that in very thorough style	8	heard of that lawsuit as well?
9	and provided everything that, you know, we could	9	A. No. I may have read about it. But yeah, I
10	provide.	10	mean, I know I know if you were to ask me, you know
11	Q. Number 13. We requested similar	11	that Mike Lindell has a lawsuit filed against him by
12	communications with Eric Trump.	12	by this election stuff, I would have said yeah, but I
13	Can you tell me, give me a little bit of	13	think it's by Dominion. So that's what I I didn't
14	background on Mr. Trump Jr well, not Eric Trump's	14	realize that Coomer had also filed a lawsuit against
15	involvement with the Tour? How frequently is he a	15	him, unless it's the same thing.
16	speaker?	16	Did Brad freeze up?
17	A. How frequently is he a speaker? Probably the	17	MS. WEISS: Brad, I think you are frozen.
18	last year he has come to almost the last the past	18	THE VIDEOGRAPHER: I couldn't tell,
19	year's, but not all of them. But a fair number of them	19	because when he has
20	this past year.	20	THE WITNESS: He's dropped out.
21	Q. Do you know if he's if he receives a	21	THE VIDEOGRAPHER: Yeah.
22	speaker fee for his appearances on the Tour?	22	MR. GREAVES: I couldn't tell either, because
23	A. No, no idea.	23	his document was still taking up the screen.
24	Q. And actually the same question for Patrick	24	THE VIDEOGRAPHER: Right.
25	Byrne. Do you know if he receives a fee when he appears Page 174	25	MR. GREAVES: Let's go off the record.  Page 176
1	as a speaker on the Tour?	1	THE VIDEOGRAPHER: Okay. Please stand by.
2	A. No idea.	2	The time is 3:03 p.m., and we're going off the
3	Q. With respect to Eric Trump, have you ever	3	record.
4	discussed Eric Coomer with Eric Trump?	4	(A recess was had at 3:03 p.m. to 3:09 p.m.)
5	A. I don't believe I have. I don't recall ever	5	THE VIDEOGRAPHER: The time now is 3:09 p.m.,
6	having that conversation him.	6	and we are back on the record. You may proceed.
7	Q. Are you aware that Eric Trump was Tweeting and	7	BY MR. KLOEWER:
8	sharing articles about Eric Coomer in November and	8	Q. Okay. Before the Internet went out over here
9	December of 2020?	9	we were discussing your communications with Mike
10	A. I'm not.	10	Lindell. And I was asking if, in relation to Josh
11	Q. And he's never asked you about Eric Coomer?	11	Merritt, who we discussed before, did Mike Lindell or
12	A. Eric Trump?	12	Josh Merritt ever send you an Excel spreadsheet that
13	Q. Correct.	13	included various tabs about Eric Coomer's friends,
14	A. I don't believe he's ever ever asked me	14	family, their home addresses, contact info, things of
15	about him. I don't believe we've ever had a	15	that nature?
16	conversation about Coomer.	16	A. I don't recall if that was ever sent to me,
17	Q. How do you typically communicate with Eric	17	no. I don't believe it was, but I don't recall if it
18	Trump? Is that by text message, by e-mail?	18	was sent to me.
19	A. Text.	19	Q. Did you ever receive a document like that from
20	Q. The last one we have here is Mike Lindell.	20	Charles Herring?
21	Have you ever discussed Dr. Coomer with Mike Lindell?	21	A. I don't recall that. I don't know.
22	A. I don't recall if we have specifically talked	22	Q. Did you ever receive a document from
23	about Coomer.	23	Mr. Lindell that included e-mail addresses and passwords
24	Q. You are aware that Dr. Coomer has filed a	24	for employees of Smartmatic and Dominion Voting Systems?
25	lawsuit against Mike Lindell, My Pillow, and FrankSpeech	25	A. I don't recall if I ever received anything
	Page 175		Page 177

1	like that.	1	States or abroad?
2	Q. Do you deny ever receiving something like	2	A. I have heard about it. I have heard about it,
3	that?	3	read about it in the news.
4	A. I don't deny it. I just don't remember if I	4	Q. Okay. As you sit here today, do you believe
5	ever received something like that in e-mails. I just	5	that that has occurred?
6	don't remember.	6	A. Believe what has occurred?
7	Q. And the same question for Charles Herring.	7	Q. That the United States military has utilized a
8	Did he ever send you a spreadsheet with Voting System		super computer called Hammer to manipulate election
9	employee e-mails and passwords?	8	results around the world?
10			
11	A. I don't I don't recall receiving anything like that.	10	A. I'm not sure what you're asking me. That the
		11	U.S. military has the capability to manipulate
12	Q. All right. Are you aware of any document that	12	elections?
13	meets that description that's in your possession today?	13	Q. Yes.
14	A. I'm not.	14	A. I mean, are you asking me if we have or have
15	Q. Just real quick on the topic of Mike Lindell.	15	ever manipulated elections around the world?
16	Did you did you appear at his cyber symposium that h		Q. I am asking if a super computer called Hammer
17	hosted in South Dakota a few years ago in August of	17	has done that, to your knowledge.
18	2021? Does that sound familiar?	18	A. I to my knowledge, I don't know that. I
19	A. The event I recall, but I don't believe I I	19	don't know that.
20	attended.	20	Q. And did Mr. Montgomery ever provide you any
21	Q. Okay. And why not?	21	evidence or information related to Hammer or Scorecard?
22	A. Scheduling maybe. I don't know. I don't	22	A. No, not if he did, I don't recall. But I
23	remember.	23	don't remember ever communicating with him other than my
24	Q. Do you recall watching that event in realtime?	24	first when I met him.
25	A. I don't recall. I mean, I remember I Page 178	25	MR. KLOEWER: Okay. I'm sorry to go off the Page 180
1	remember I remember there was pieces of it on the	1	record again after I just did, but if I could just
2	Internet, I mean, stuff that I do remember, but that's	2	have like three minutes, I think I'll probably wrap
3	about it.	3	up here pretty quick if we could just have a quick
4	Q. And on an unrelated note, have you ever worked	4	break, and I'll hop back on here in two, three
5	with a guy named Dennis Montgomery?	5	minutes.
6	A. I know who it is, but I don't recall ever	6	THE WITNESS: Sure. Great. Thank you.
7	working with him. I don't believe I ever worked with	7	THE VIDEOGRAPHER: The time now is 3:14 p.m.,
8	him.	8	and we're going off the record.
9	Q. Have you ever met him?	9	(A recess was had at 3:14 p.m. to 3:20 p.m.)
10	A. I have. I met him once.	10	THE VIDEOGRAPHER: The time now is 3:20 p.m.,
11	Q. What was the context of that meeting?	11	and we are back on the record. You may proceed.
12	A. Introduction and just talking about, you know,	12	MR. KLOEWER: Okay. We continue to have some
13	background and technical stuff. A lot of things. But	13	Internet problems on my end. But in any case, I
14	that's that's about it. Nothing dramatic.	14	have no further questions, so I'll pass the
15	Q. Are you aware that Mr. Montgomery claims that		witness.
16	there's a super computer called Hammer which has rigge	l	MS. WEISS: I don't have any questions. Thank
17	elections all over the world?	17	you.
18	A. I am. I have heard that.	18	MR. GREAVES: No questions.
19	Q. Do you have any reason to believe that		•
20		19	THE VIDEOGRAPHER: Okay. Read or waive?
20	computer exists?	20	MR. KLOEWER: Okay. Sorry.
	A. I don't have any reason to believe that it	21	MR. GREAVES: He'll read.
22	exists or doesn't exist.	22	THE VIDEOGRAPHER: All right. Are we ready to
23	Q. So in your experience, you've never heard of	23	go off the record then?
24	Hammer or a software application called Scorecard being	Γ	MR. KLOEWER: I believe so, yes.
25	utilized to manipulate election results in the United Page 179	25	THE VIDEOGRAPHER: Okay. Please stand by. Page 181
	1 age 179		1 age 101

1	The time now is 3:21 p.m. We are going off	1	REPORTER'S CERTIFICATE
2	the record. And this concludes today's testimony	2	
3	given by Michael T. Flynn.	3	STATE OF FLORIDA
4	The total number of media used was four and	4	COUNTY OF HILLSBOROUGH
5	will be retained by Veritext Legal Solutions.	5	
6	(Concluded at 3:21 p.m.)	6	I, Nathan F. Perkins, Registered Diplomate
7	1 /	7	Reporter, certify that I was authorized to and did
8		8	stenographically report the deposition of Michael T.
9		9	Flynn; that a review of the transcript was requested;
10		10	and that the transcript is a true and complete record of
11		11	my stenographic notes.
12		12	my steriographic notes.
13		13	I further certify that I am not a relative,
14		14	employee, attorney, or counsel of any of the parties,
15		15	nor am I a relative or employee of any of the parties'
16		16	attorney or counsel connected with the action, nor am I
		17	-
17			financially interested in the action.
18		18	D 4 141: 194 1
19		19	Dated this 18th day of April, 2024.
20		20	
21		21	Bothon & Reskins
22		22	TANKO PERM
23		23	
24		24	Nathan F. Perkins, RDR
25	Page 182	25	Page 184
	1 uge 102		1 ugc 104
1	CERTIFICATE OF OATH	1	WITNESS' SIGNATURE PAGE
2	CERTIFICATE OF OATH	1 2	PLEASE ATTACH TO THE DEPOSITION OF MICHAEL T. FLYNN,
2 3		2	PLEASE ATTACH TO THE DEPOSITION OF MICHAEL T. FLYNN, TAKEN ON APRIL 4, 2024, IN THE CASE OF ERIC COOMER,
2 3 4	STATE OF FLORIDA		PLEASE ATTACH TO THE DEPOSITION OF MICHAEL T. FLYNN,
2 3		3	PLEASE ATTACH TO THE DEPOSITION OF MICHAEL T. FLYNN, TAKEN ON APRIL 4, 2024, IN THE CASE OF ERIC COOMER, Ph.D., VS. MAKE YOUR LIFE EPIC LLC, ETC., ET AL.
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1	Jason Greaves	
2	jason@binnell.com	
3	April 18, 2024	
4	RE: Coomer, Eric, Ph.D. v. Make Your Life Epic	
5	4/4/2024, Michael T. Flynn (#6630872)	
6	The above-referenced transcript is available for	
7	review.	
8	Within the applicable timeframe, the witness should	
9	read the testimony to verify its accuracy. If there are	
10	any changes, the witness should note those with the	
11	reason, on the attached Errata Sheet.	
12	The witness should sign the Acknowledgment of	
13	Deponent and Errata and return to the deposing attorney.	
14	Copies should be sent to all counsel, and to Veritext at	
15	Errata-tx@veritext.com.	
16	Return completed errata within 30 days from	
17	receipt of testimony.	
18	If the witness fails to do so within the time	
19	allotted, the transcript may be used as if signed.	
20		
21		
22	Yours,	
23	Veritext Legal Solutions	
24		
25		
	Page 186	

## Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES

ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1,

2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

## VERITEXT LEGAL SOLUTIONS

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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at www.veritext.com.