

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

Civil Action No. 1:22-cv-01129-NYW-SKC

ERIC COOMER, PhD.,

Plaintiff

v.

MICHAEL J. LINDELL, FRANKSPEECH LLC,  
AND MY PILLOW, INC.,

Defendants

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**EXHIBIT 8**  
**PLAINTIFF'S MOTION TO COMPEL DEPOSITION TESTIMONY FROM**  
**DEFENDANT MICHAEL J. LINDELL AND MOTION FOR SANCTIONS**  
**PURSUANT TO F.R.C.P. 30 AND F.R.C.P. 37**

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Deposition Transcript of Michael J. Lindell  
Designated Representative of Frankspeech LLC  
Dated 03-09-23

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
Civil Action No.: 1:22-cv-01129-WJM

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Eric Coomer, Ph.D.,

Plaintiff,

vs.

Michael J. Lindell, Frankspeech LLC,  
and My Pillow, Inc.,

Defendants.

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VIDEOTAPED DEPOSITION OF  
MICHAEL J. LINDELL  
Designated Representative of FrankSpeech LLC  
Taken on MARCH 9, 2023  
Commencing at 9:59 a.m.

REPORTED BY: Mari Skalicky, RMR, CRR

<p>1 VIDEOTAPED DEPOSITION of MICHAEL J.                  2 LINDELL, taken on Thursday, March 9th, 2023,                  3 commencing at 9:59 a.m. CDT, at 123 North 3rd                  4 Street, Minneapolis, Minnesota, before Mari                  5 Skalicky, a Certified Realtime Reporter, and                  6 Notary Public of and for the State of                  7 Minnesota.                  8                  9                  10                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>	<p>1                  2 APPEARANCES                  3 (Continued)                  4                  5 ALSO PRESENT:                  6 Adam Wallin, Videographer                  7                  8 NOTE: The original transcript will be                  9 provided to the taking party of the                  10 deposition.                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>
Page 2	Page 4

<p>1                  2 APPEARANCES                  3 ON BEHALF OF THE PLAINTIFF:                  4 CAIN &amp; SKARNULIS PLLC                  5 BY: CHARLES J. CAIN, ESQUIRE                  6 BY: BRADLEY A. KLOEWER, ESQUIRE                  7 P.O. Box 1064                  8 101 North F Street, Suite 207                  9 Salida, CO 81201                  10 ccain@cstrial.com                  11 bkloewer@cstrial.com                  12                  On BEHALF OF THE DEFENDANTS:                  13                  14 PARKER DANIELS KIBORTH                  15                  16 BY: RYAN MALONE, ESQUIRE                  17                  18 888 Colwell Building                  19                  20 123 North Third Street                  21                  22 Minneapolis, MN 55401                  23                  24 malone@parkerdk.com                  25</p>	<p>1 I N D E X                  2                  3 WITNESS: MICHAEL J. LINDELL                  4 PAGE                  5 Examination by Mr. Kloewer ..... 9                  6 PREVIOUSLY MARKED EXHIBIT:                  7 Exhibit 65 Video clips 20                  8 ***                  9                  10                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>
Page 3	Page 5

1 EXHIBITS INTRODUCED:  
2  
3 Exhibit 77 Plaintiff's First Amended 10  
4 Notice of Intention to Take  
5 Oral and Videotaped  
6 Deposition of the Authorized  
7 Representative(s) of  
8 Frankspeech LLC  
9  
10 Exhibit 78 FrankSpeech screenshot 66  
11 [REDACTED]  
12  
13 Exhibit 80 Defendant Frankspeech LLC's 90  
14 Supplemental Answers to  
15 Plaintiff's First Set of  
16 Interrogatories  
17  
18 Exhibit 81 Terms of Use for Frankspeech 93  
19 Exhibit 82 Screenshot from 115  
20 frankspeech.com  
21  
22 Exhibit 83 Declaration of J. Alex 118  
23 Halderman  
24  
25 Exhibit 84 Declaration of J. Alex 127  
26 Halderman  
27 [REDACTED]  
28 [REDACTED]  
29 [REDACTED]  
30 [REDACTED]  
31 [REDACTED]  
32 [REDACTED]  
33 [REDACTED]  
34 [REDACTED]  
35 [REDACTED]

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1 PROCEEDINGS  
2  
3 THE VIDEO OPERATOR: We are going on  
4 the record at 9:59 a.m. on March 9th,  
5 2023.  
6 This is the video-recorded deposition  
7 of the designated representative of  
8 FrankSpeech LLC, Michael J. Lindell, taken  
9 by counsel for the plaintiff, in the  
10 matter of Eric Coomer, Ph.D., versus  
11 Michael J. Lindell, FrankSpeech LLC, and  
12 My Pillow, Incorporated, in the United  
13 States District Court for the District of  
14 Colorado, Civil Action number  
15 1:22-cv-01129-WJM.  
16 This deposition is being held in  
17 Minneapolis, Minnesota. My name is Adam  
18 Wallin, from the firm Veritext, and I'm  
19 the videographer. The court reporter is  
20 Mari Skalicky from the firm Veritext.  
21 Will counsel please identify  
22 themselves for the record.  
23 MR. KLOEWER: Brad Kloewer for the  
24 plaintiff, and I'm joined by Charley Cain.  
25 MR. MALONE: Ryan Malone for

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10  
11 (Original exhibits attached to original  
12 transcript; copies to counsel as requested.  
13  
14  
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1 FrankSpeech LLC.  
2 THE VIDEO OPERATOR: Will the court  
3 reporter please swear in the witness.  
4 (Whereupon, the deposition of MICHAEL  
5 J. LINDELL was commenced at 9:59 a.m. as  
6 follows:)  
7  
8 MICHAEL J. LINDELL,  
9 after having been first duly sworn,  
10 deposes and says under oath as follows:  
11 ---  
12 EXAMINATION  
13 BY MR. KLOEWER:  
14 Q. Good morning, Mr. Lindell. My name is  
15 Brad Kloewer, counsel for Dr. Eric Coomer.  
16 We already went through some  
17 introductory ground rules yesterday. I  
18 know we've already discussed those, the  
19 deposition here today.  
20 I do just want to clarify before we  
21 start, are you on any medications or  
22 anything that may affect your ability to  
23 provide testimony here today?  
24 A. No.  
25 Q. And what we discussed yesterday was the

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1 There is one thing I said, and that  
2 was after Newsmax -- when Chris Ruddy  
3 called me -- and you can get him right  
4 here and he'll tell you how upset I was.  
5 I bad-mouthed Newsmax for two weeks  
6 after that. I bad-mouthed Coomer for one  
7 sentence. But after you serve me papers  
8 in Colorado, I probably bashed him for a  
9 month, because I'm going another lawsuit,  
10 another lawsuit.  
11 I threw it. I never even opened the  
12 paper. Did you know that? I never even  
13 opened it. I just gave to it my  
14 attorneys.  
15 I got better things to do with my  
16 life. We're trying to save a country  
17 here, not that you guys, ambulance-chasing  
18 lawyers, trying to get money off people  
19 that had nothing to do with it.  
20 My employees, if I sat here and they  
21 sat here and looked at you guys, they  
22 would say how could people do this? How  
23 could anybody do this to anybody? And  
24 that's -- you know.  
25 And did I say, and you wonder why I

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1 said that, and I apologize for calling  
2 your friend a scumbag, but I'm so upset  
3 what you did, not to me, but to my  
4 employees. What you did to my employees.  
5 Why would you do that?  
6 You didn't even do your research.  
7 You could have came and you said, "Do you  
8 even know Eric Coomer?" "No." Instead  
9 Chris Ruddy has to call me and tell me I  
10 can't go on his show anymore. And that  
11 was a big thing to me when I would go on  
12 the host and talk about My Pillow, and  
13 made in America and everything.  
14 I'm sitting right now my business is  
15 probably down -- I don't know -- half,  
16 more than half, because of all this stuff.  
17 But I can't go on TV to promote it. I can  
18 do a commercial, but I can't go on there  
19 and say, "Hey, my employees thank you."  
20 They used to come out and show --  
21 Newsmax, you would have one of their hosts  
22 go, "Look at this. Look at all the, you  
23 know, Made in America," and interviewing  
24 me, and my employees would come on his  
25 show.

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1 Q. Okay.  
2 A. That all got thrown away when you guys did  
3 this.  
4 Q. Mr. Lindell, your testimony has confused  
5 me on this issue for many reasons.  
6 Did Chris Ruddy tell you that a  
7 condition of settlement --  
8 A. Straight up. The thing he said, "I can't  
9 have you on to even talk about pillows  
10 anymore."  
11 It was -- I'll read the complaint.  
12 It was the day -- when he told me that was  
13 the day you guys made a dirty deal. And I  
14 said -- and I said, "What did you do?  
15 You've made a public statement saying  
16 there is nothing wrong with the machines."  
17 We had all kinds of conversation.  
18 And I go, "Who is Eric Coomer?" you  
19 know, and he said something about he works  
20 for Dominion or something -- I can't  
21 remember that part. But I found out he  
22 worked for Dominion.  
23 I don't care who he worked for. Eric  
24 Coomer did this to me and I don't even  
25 know the guy. It's disgusting.

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1 So when you say when I called him a  
2 criminal, when I said "Eric Coomer, if I'm  
3 you right now, instead of going over and  
4 making deals with Newsmax, I'm turning  
5 myself in and turning in your operation;  
6 just maybe that you get immunity and you  
7 get to do maybe 10, 20 years. You are  
8 disgusting, and you are treasonous. You  
9 are a traitor to the United States."  
10 And I said that because of what he  
11 did. When I was told by Ruddy on my  
12 business is just kkk (sound) because of  
13 some guy I don't know. That's just  
14 bizarre. And you guys -- and then you  
15 guys sue me.  
16 I didn't say -- this is the only  
17 thing I said about him. A year later you  
18 sue My Pillow and FrankSpeech and Mike  
19 Lindell. Everything else that was said  
20 was after you sued me.  
21 And I still didn't check into all  
22 your stuff on your guy. I'm going, "Go  
23 ahead and sue me." I threw it on the  
24 pile -- you can even ask my lawyer --  
25 never read it.

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1 I've got enough stuff going on to  
 2 help save our country than sit here and  
 3 fight a lawsuit. I just keep giving them  
 4 money, "Go ahead, keep going, go ahead."  
 5 I got a country. We have to save our  
 6 country. That's reality.  
 7 Q. Is it your belief that Eric Coomer  
 8 discussed you with Newsmax?  
 9 A. Absolutely. 100 percent.  
 10 Q. Why? Why do you think that?  
 11 A. Because he didn't want me going up on  
 12 there. I don't know. For Dominion?  
 13 Q. Who told you that?  
 14 A. I don't know --  
 15 Q. Did Chris Ruddy tell you that?  
 16 A. Chris Ruddy, in so many words he said,  
 17 "You can't come on anymore because of this  
 18 deal." And he goes, "Mike, I've got to  
 19 protect my -- I've got to protect my  
 20 platform, my -- or Newsmax," because I  
 21 bad-mouthed him every day for like two  
 22 weeks.  
 23 And then he called me and he goes,  
 24 "Will you please" -- his friend called,  
 25 "Will you please quit bad-mouthing Chris?"

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1 I said, "Okay."  
 2 So then I bad-mouthed Newsmax for the  
 3 next month. I still bad-mouth them.  
 4 Them, Fox News, Salem Media, none of  
 5 them will come on. You can't get on there  
 6 to talk about even pillows or anything,  
 7 like I said yesterday, because of you  
 8 guys, because of lawfare. And because of  
 9 a deal -- dirty deal you made with Chris  
 10 Ruddy.  
 11 What did Chris Ruddy do to you? I  
 12 don't know. Nor do I care.  
 13 Q. Well, you didn't listen --  
 14 A. But Chris Ruddy -- how dare you guys tell  
 15 Chris Ruddy I can't go on there. That I  
 16 can't go on there to talk about pillows?  
 17 That's disgusting.  
 18 Q. Chris Ruddy told you that he --  
 19 A. I could not come on anymore.  
 20 Q. -- that we told him that you could not  
 21 come on? Chris Ruddy told you that?  
 22 A. After your deal, whatever the deal was,  
 23 "Mike, I made a deal, you cannot come on  
 24 anymore." That's it. I can't come on  
 25 anymore.

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1 Q. You never investigated --  
 2 A. I was so upset.  
 3 Q. -- why Dr. Coomer had sued Newsmax,  
 4 correct?  
 5 (Court reporter interruption.)  
 6 BY MR. KLOEWER:  
 7 Q. You never investigated why Dr. Coomer had  
 8 sued Newsmax, correct?  
 9 A. All I know is what Dr. Coomer and you guys  
 10 did to me. What Chris Ruddy -- what did I  
 11 have to do with that? Chris Ruddy said  
 12 that, "I made a deal and I can't have you  
 13 on the show anymore."  
 14 Q. Did you ever consider the possibility that  
 15 Newsmax had published claims about Eric  
 16 Coomer that was were false?  
 17 A. You know what, I don't care what happened  
 18 there. All I care what did you to me, to  
 19 My Pillow.  
 20 Whatever dirty deal you went down and  
 21 tell him not to have Mike Lindell on, you  
 22 lawyers telling him not to have Mike  
 23 Lindell on?  
 24 Q. But he didn't tell you that, did he?  
 25 A. He said, "I made a deal" -- I'm going to

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1 say it to you again. "I made a deal and I  
 2 can no longer have Mike Lindell on, not  
 3 even to talk about pillows."  
 4 That's a quote. He made a deal with  
 5 you. So did you tell him? You got to ask  
 6 yourself that.  
 7 You know, we're going to try -- maybe  
 8 we'll get the emails from you guys that  
 9 you did, or the conversation. Maybe we  
 10 can subpoena some. Oh, right, that's  
 11 lawyer privilege; you won't give us that.  
 12 Of course you won't, you know.  
 13 I would love to be in a room when you  
 14 and Chris Ruddy talked about censoring  
 15 Mike Lindell and My Pillow. That's what I  
 16 would like to be.  
 17 But, you know, I think it's -- what  
 18 you did is horrible. We've done nothing.  
 19 And you guys -- and then you wonder why I  
 20 sit here.  
 21 How do you guys sleep at night? You  
 22 obviously don't have a My Pillow; that's a  
 23 fact, you know. I mean, I just can't  
 24 fathom, and that's why I'm so upset.  
 25 You know how mad I was when I came in

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1 here yesterday? You're right, I should  
 2 have read this, but I've got other things  
 3 going on in my life that are a lot more  
 4 important than these frivolous lawsuits.  
 5 And it's the most important thing to our  
 6 country ever, to my children, my  
 7 grandchildren, everything.  
 8 That's where I'm at. So we can keep  
 9 going, you know, and waste an afternoon.  
 10 Q. I would like to get into the videos of all  
 11 the various statements that have come up  
 12 here, and we can talk a little bit more  
 13 about the Newsmax settlement.  
 14 My concern is that that is going to  
 15 be a bigger issue and is going to take a  
 16 lot of time.  
 17 MR. KLOEWER: So if it makes sense to  
 18 everybody, I think we can break for lunch  
 19 now.  
 20 THE WITNESS: Have we already ordered  
 21 lunch?  
 22 MR. KLOEWER: And when we come back,  
 23 we can get into that --  
 24 THE WITNESS: That sounds good.  
 25 MR. KLOEWER: -- additional material?  
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1 THE VIDEO OPERATOR: We're going off  
 2 the record at 12:22 p.m.  
 3 (A lunch recess was taken.)  
 4 THE VIDEO OPERATOR: We're back on  
 5 the record at 1:17 p.m.  
 6 BY MR. KLOEWER:  
 7 Q. Okay, Mr. Lindell. When we left off, we  
 8 were talking about the FrankSpeech website  
 9 a little bit.  
 10 I want to wrap up a few issues  
 11 related to the sort of back end of the  
 12 FrankSpeech website as I understand it.  
 13 So I'll show you what's been marked  
 14 as Exhibit 85 here.  
 15 (Deposition Exhibit No. 85 was  
 16 introduced.)  
 17 BY MR. KLOEWER:  
 18 Q. Have you seen this document before?  
 19 A. No. No.  
 20 Q. Okay. Well, it's been disclosed as  
 21 FRANKSPEECH-00009. It's labeled as a  
 22 "Master Consulting Services Agreement,"  
 23 and it's dated March 11, 2021. And it  
 24 states on the first page that it's made  
 25 between Brannon Howse, RJ Daniel Johnston,  
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1 Johnston Howse, LLC --  
 2 A. Yep.  
 3 Q. -- and Mike Lindell.  
 4 Does that refresh your memory a bit  
 5 as to what we're looking at here?  
 6 A. Yeah, and I see "Vocl." This was never  
 7 done because Vocl, like I said, that's not  
 8 a real entity. We didn't get it -- this  
 9 never came to fruition.  
 10 Q. Okay. You're anticipating my next  
 11 question then because I was a little  
 12 confused about that.  
 13 I see that this document isn't  
 14 signed --  
 15 A. Yep.  
 16 Q. -- either.  
 17 A. Right.  
 18 Q. So --  
 19 A. It was -- you want me to explain it?  
 20 Q. Yes. What is Vocl?  
 21 A. Vocl was -- like you had to pick a name,  
 22 like a social media name, and I liked the  
 23 name Vocl, V-o-c-l. And when it went out  
 24 there to -- you have to get the name, I  
 25 made the mistake of saying something  
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1 publicly. So they went out -- somebody  
 2 quick grabbed it and the patent trademark.  
 3 And so we went to -- we grabbed it,  
 4 and then it came in from everywhere, the  
 5 fighting, threatening lawsuits from at  
 6 least six different entities out there.  
 7 And nobody owned it.  
 8 So I said, you know what, let's just  
 9 sit there.  
 10 And then when we went and did  
 11 Frank -- Frank -- we couldn't have Frank.  
 12 We ended up doing FrankSpeech. I don't  
 13 know how long it was after this. This was  
 14 early on.  
 15 So this was absolutely nothing.  
 16 Q. So this -- so was there a second -- was  
 17 there a follow-up contract to this that  
 18 was entered into with Johnston Howse for  
 19 FrankSpeech?  
 20 A. Whatever you got. Whatever you got or  
 21 subpoenaed, you have. That's all I have.  
 22 That's 100 percent. Whatever you got, I'm  
 23 fully transparent.  
 24 I don't even know if we're working  
 25 under an agreement.  
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1 A. Let me tell you what this would -- this  
 2 would make a traitor. Okay? Okay.  
 3 When you just put that, by coming to  
 4 someone with lawfare, whatever you did,  
 5 and you go to a guy and you tell him not  
 6 to have an individual there that runs a  
 7 company With 2,000 Americans making  
 8 pillows and making products, and you  
 9 tell -- let me finish -- and you tell him  
 10 this guy has never said one thing about  
 11 Eric Coomer ever -- Mike Lindell had  
 12 never -- I didn't even know who the guy  
 13 was. And you tell him not to let Mike  
 14 Lindell on because, what? Because I'm  
 15 going to sell pillows? Or maybe I'm going  
 16 to talk bad about electronic voting  
 17 machines?  
 18 I never mentioned Eric Coomer in my  
 19 life. Didn't even know who he was until  
 20 you did that to me. But you left that out  
 21 of the story, didn't you?  
 22 The public needed to hear, "And by  
 23 the way, we are not going to have Mike  
 24 Lindell on there ever again because he  
 25 wants to get rid of electronic voting

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1 machine." Not because I said -- ever said  
 2 anything about Eric Coomer, because I  
 3 didn't even know the man. I never said  
 4 one word about him.  
 5 How could you do this? Answer that  
 6 question. What does that have to do with  
 7 me other than -- the only thing it has,  
 8 you didn't mention me there. That  
 9 actually proves my case.  
 10 Yes. Do I think you guys and them  
 11 are traitor to our country by what you did  
 12 to My Pillow? Yes. We are made in  
 13 America.  
 14 You guys are bizarre. What does this  
 15 have to do with me? I didn't bad-mouth  
 16 Eric Coomer. Maybe -- I don't care if  
 17 Newsmax did or whatever they did to him.  
 18 That's their business. That's your  
 19 business with Eric Coomer.  
 20 Go ahead and sue all them guys. You  
 21 got money out of Chris Ruddy, because  
 22 obviously he said something about your  
 23 guy, which I never did, you guys.  
 24 BY MR. KLOEWER:  
 25 Q. Mr. Lindell --

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1 A. I never did.  
 2 Q. -- it didn't occur to you -- this was a  
 3 big news story at the time. The  
 4 settlement was in the news.  
 5 It didn't occur to you at all that  
 6 when you went on television to accuse  
 7 Dr. Coomer of treason, that people would  
 8 assume that you were adopting the same  
 9 claims that Eric Coomer had about --  
 10 A. No, no.  
 11 MR. MALONE: Mike, Mike --  
 12 A. Because I went on my station and -- I went  
 13 on my station and I explained it. I  
 14 explained what Ruddy did, or whatever,  
 15 that I couldn't come on there anymore. I  
 16 said, "I don't know this Coomer from  
 17 Adam."  
 18 You just took a snidbit out right  
 19 here is what you did. You killed the  
 20 whole thing I said that day. You took one  
 21 little snidbit out; that's all -- in fact,  
 22 that's the only time I probably put his  
 23 name in the thing. I probably bad-mouthed  
 24 Ruddy for the whole thing for not letting  
 25 me on about My Pillow, and I know I did,

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1 for two weeks straight.  
 2 I only mentioned Eric Coomer's name  
 3 once, because he happened to be the guy  
 4 that did it to me.  
 5 Q. Let's take a look at what you said. We  
 6 may come back to the original Oltmann  
 7 interview, but it sounds like you don't  
 8 have any -- you've never made any effort  
 9 to learn anything about this case.  
 10 A. No, I haven't. No, absolutely not.  
 11 MR. KLOEWER: Let's take a look at  
 12 clip 12. And I'll represent -- this will  
 13 be a duplicate exhibit here. It's been  
 14 previously labeled as Exhibit 43, clip 3.  
 15 We have it as Exhibit 65, clip 12 as well.  
 16 Let's take a look at that.  
 17 (Playing Video Clip:  
 18 "It's over for Dominion. It's too  
 19 late to close the gate. The cows are  
 20 out of the barn. Dominion, you did  
 21 your best, and Smartmatic, to take  
 22 our country through China. You did  
 23 your best. You corrupt people. You  
 24 tried to suppress our voice. You  
 25 didn't. You failed. And I'm telling

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1 about FrankSpeech?  
 2 Q. Well, both.  
 3 A. Okay. Moneywise, no. We lost millions of  
 4 dollars. Okay.  
 5 But as far as people knowing  
 6 FrankSpeech, knowing that the web -- or  
 7 that the website exists, yes. People  
 8 stayed with us after that, and there were  
 9 people that stayed with that put up  
 10 podcast and so on. And I think that did  
 11 solidify FrankSpeech, at least that we  
 12 would have some people there all the time.  
 13 MR. KLOEWER: What's the Bates label  
 14 on this, Charley, just for the record?  
 15 MR. CAIN: 58. FRANKSPEECH 58.  
 16 MR. KLOEWER: So to clarify, we were  
 17 just looking at what's been previously  
 18 labeled as FRANKSPEECH 58, or 000058.  
 19 BY MR. KLOEWER:  
 20 Q. Okay. We're going to fast forward in time  
 21 here --  
 22 A. I want to say one thing, too. That  
 23 metrics you're showing there, those were  
 24 visitors to FrankSpeech. Those are not  
 25 viewers of Lindell-TV. Just to make that

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1 perfectly clear.  
 2 Those are visitors to FrankSpeech,  
 3 and it doesn't show the metrics of who  
 4 watched Lindell-TV, because the people  
 5 coming in -- when you do a website metrics  
 6 like Google Analytics, that can be  
 7 computerized, those numbers can be skewed.  
 8 I would check into that if I was back  
 9 then, if I really wanted to know how many  
 10 were actually watching Lindell-TV versus  
 11 being on the platform FrankSpeech.  
 12 Q. And do you have that sort of data to  
 13 compare?  
 14 A. I don't. I don't. That's what I'm hoping  
 15 to get one of these days when we get the  
 16 new system coming in.  
 17 Q. Okay. So we're going to fast forward in  
 18 time here a bit.  
 19 You've spoken a lot about the  
 20 different statements addressed in the  
 21 complaint.  
 22 I want to take a look at some of the  
 23 things you said after you were served with  
 24 the lawsuit in this case.  
 25 So if we could take a look at what is

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1 labeled as clip 21. It's Exhibit 65, clip  
 2 21. This is a bit of a long clip, so we  
 3 may pause it a couple times here, but I  
 4 want to understand why you're saying some  
 5 of the things in this statement.  
 6 So this is from April 6th of 2022.  
 7 (Playing Video Clip:  
 8 "If you want to know just how  
 9 corrupt -- the corruption we're up  
 10 against, Eric Coomer served papers to  
 11 me before I was going on stage at the  
 12 Capitol.  
 13 Now, I've never talked about Eric  
 14 Coomer. He's the president --  
 15 apparently he's the president of  
 16 Dominion, the criminal crime family  
 17 here in Denver. I guess he's the guy  
 18 that ran into a building or did  
 19 something the other day that" --)  
 20 BY MR. KLOEWER:  
 21 Q. Okay. "Dominion, the criminal crime  
 22 family here in Denver," what do you mean  
 23 by that?  
 24 A. I mean that what they've done to me and  
 25 what they've done to our country,

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1 absolutely. I stand by that.  
 2 You guys served me papers. You  
 3 served -- you went against My Pillow,  
 4 served My Pillow and me papers in a  
 5 lawsuit. You are part of a criminal crime  
 6 family as far as I'm concerned.  
 7 Q. What has Dominion done against our  
 8 country? You said "what it's done against  
 9 me and against our country"?  
 10 A. No, that was Eric Coomer. Did you hear me  
 11 say that? That's Eric Coomer. He served  
 12 me papers.  
 13 You guys are attacking me. That's  
 14 criminal. You get that?  
 15 Q. I believe you just responded -- I said  
 16 "criminal crime family," what does that  
 17 mean, talking about Dominion, and you  
 18 said --  
 19 A. Dominion and Coomer. I put both of you  
 20 together.  
 21 Q. Yes.  
 22 A. Because I found out now that he was part  
 23 of Dominion. That was after you served  
 24 me.  
 25 So you keep suing My Pillow employees

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1 and it's shameful. That's what I mean. I  
 2 think it's criminal, and, you know, part  
 3 of a criminal crime family, Dominion.  
 4 All -- you know, Dominion.  
 5 Q. I believe you said in your response that  
 6 "for what he's done to me" -- or for what  
 7 Dominion has done to you and to our  
 8 country.  
 9 And my question is, what has Dominion  
 10 done to our country?  
 11 A. What has Dominion done to our country.  
 12 They sued over 200 lawsuits and/or letters  
 13 to citizens. I have sat with them,  
 14 they've cried. They've had to get home  
 15 security system. They've done nothing.  
 16 All they were was poll watchers, over 200.  
 17 You asked me what they did to our  
 18 country. These are U.S. citizens. These  
 19 citizens finally put up a lawsuit against  
 20 them when they all got together, like a  
 21 class action suit, against Dominion.  
 22 What they have done to our country  
 23 with lawfare and attacking our citizens,  
 24 and without even showing what's inside.  
 25 All we ask is, "You're running our

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1 elections; you better show us what's  
 2 inside." They won't do it.  
 3 That's criminal. It's criminal.  
 4 Lawfare has not been used in our country  
 5 since 1798. That's why they're criminal,  
 6 and you know that's why they're criminal.  
 7 Q. You believe that Dominion Voting Systems  
 8 played a role in rigging the election,  
 9 correct?  
 10 A. A hundred percent. It's not even close.  
 11 1,000 percent.  
 12 Q. So when you accuse them of being a  
 13 criminal organization, there is two things  
 14 in your mind. We've established that you  
 15 are -- you think they're criminal for  
 16 filing lawsuits, for what you've described  
 17 as lawfare, but you also believe that  
 18 Dominion played a role in rigging the  
 19 election.  
 20 A. 100 percent. It's not even a question.  
 21 Not even a question.  
 22 What do you think they're suing me  
 23 for? Because they're trying to cover it  
 24 up.  
 25 Q. Well, that's exactly right. That's what I

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1 was --  
 2 A. That's right, 100 percent.  
 3 Q. -- what lawsuits are because of --  
 4 A. I think I make that perfectly clear every  
 5 day.  
 6 (Court reporter interruption.)  
 7 A. That could be the dumbest question of the  
 8 week do I think they played a role. Of  
 9 course they did.  
 10 MR. KLOEWER: Okay. Let's play from  
 11 where we are at.  
 12 (Playing Video Clip:  
 13 "Who knows what he did there. But  
 14 anyway, he served papers, everybody.  
 15 He has sued -- everybody ready for  
 16 this? -- Mike Lindell, FrankSpeech,  
 17 and My Pillow.  
 18 Eric Coomer, you are a criminal."  
 19 A. You bet.  
 20 (Playing Video Clip:  
 21 "Eric Coomer, your lawyers better  
 22 look out. I'm not putting up with  
 23 this.  
 24 My Pillow doesn't even know who you  
 25 are. My employees -- I have

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1 employees, 2700 employees. Shame on  
 2 you, Eric Coomer. You did a very,  
 3 very stupid move, Mr. Coomer. You're  
 4 going to be the first one right  
 5 behind Raffensperger and all Janet  
 6 Griswold behind bars. You're going  
 7 to be number one on my list.")  
 8 BY MR. KLOEWER:  
 9 Q. "Right behind Raffensperger and Janet  
 10 Griswold behind bars."  
 11 A. Right.  
 12 Q. What do you mean by that?  
 13 A. Because they both done criminal activity.  
 14 Q. What kind of criminal activity have they  
 15 done?  
 16 A. Janet Griswold deleted all the machines of  
 17 Dominion all across Colorado, called the  
 18 trusted build.  
 19 And Raffensperger, it would take --  
 20 we would be way over on time if I told you  
 21 what all that guy did.  
 22 These are my own investigations, so I  
 23 know firsthand. When I went after Coomer  
 24 there, it's because I know -- firsthand I  
 25 know what he did, not only back with

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<p>1 It's there. It shows the election                  2 flips in two elections. It shows the Mesa                  3 County's county board election and the                  4 2020 election.                  5 100 percent, you can't sit here and                  6 deny it, but the media won't put it out,                  7 period. It's sitting there. It's on                  8 FrankSpeech. It says "inside the                  9 machine." You click it, any cyber guy --                  10 I've had cyber guys I've said, "You know                  11 what, will you go look at this and tell me                  12 what you see."                  13 It's that you can't deny it. It's                  14 time-stamped, Mesa County image, the one                  15 that Tina Peters downloaded or whatever                  16 that went public, and that's what I'm                  17 talking about. We have it.                  18 Dominion can't deny this. Neither                  19 can Eric Coomer. Whatever he's sued me                  20 for for his big cover-up, you know, sorry,                  21 guys.                  22 And you guys are just as bad because                  23 you're out running around suing people                  24 when you know they're guilty.                  25 Q. So you believe that Eric Coomer is trying</p> <p style="text-align: right;">Page 294</p>	<p>1 And you notice what I called you                  2 guys. It's criminal what you did. For                  3 you to be able to sue My Pillow.                  4 Look at My Pillow. What did they do                  5 to you? Unbelievable.                  6 Q. So it's your belief that Mr. Cain and                  7 myself are criminals as well?                  8 A. What you did is criminal. And not you're                  9 criminals, but what you've done is                  10 criminal.                  11 What you're doing here today is                  12 criminal. Absolutely criminal. You're                  13 taking money you don't deserve. You're                  14 trying to attack people that don't -- have                  15 done nothing to you. And you're wasting                  16 my time with a frivolous lawsuit because                  17 some judge didn't look at this last summer                  18 and get rid of it and say, 'Are you                  19 kidding me? You can't sue this guy for                  20 this because you went and attacked his                  21 company and got him so he can't go on TV.'                  22 I never talked about Eric Coomer in                  23 my life until you did that to Newsmax.                  24 And then you served me papers.                  25 Everything I said after you served me</p> <p style="text-align: right;">Page 296</p>
<p>1 to hide the Mesa County information?                  2 A. I don't know. I don't know if he's --                  3 maybe he has other people doing it, or                  4 maybe Dominion has got other people doing                  5 it.                  6 He sued me, and when you sue somebody                  7 that hasn't done anything, which -- this                  8 is after the fact. I'm saying this now.                  9 "You just told me you're part of it,                  10 Eric Coomer. I was nice before when you                  11 attacked me over here with Newsmax, and                  12 you attacked. I just -- right there I                  13 just called you a traitor, what did you do                  14 to my company. Now you sue me? I never said                  15 anything about you. I never knew anything                  16 about you. But all of a sudden, oh,                  17 you're the vice president or president of                  18 Dominion. Now I get it. You're                  19 Dominion."                  20 Not only are you suing me for                  21 billions here; now you got to double down                  22 and do it some more. But I guess you all                  23 lawyers -- ambulance-chasing lawyers, you                  24 all need a piece of the pie. I get that,                  25 you know. That's nice.</p> <p style="text-align: right;">Page 295</p>	<p>1 papers, I stand by it. Coomer has got to                  2 be part of it, and you guys are just as                  3 criminal what you did to me. Period,                  4 that's it.                  5 Q. The criminal crime family you're                  6 describing here that Mr. Cain and I you                  7 believe are a part of, who else is in that                  8 family?                  9 A. I don't know. Maybe you run it. I don't                  10 know. Haven't checked into that. You                  11 know, maybe that's why you sued me, so you                  12 don't -- you know, I don't know. Who                  13 knows? I don't know.                  14 I said, "What are they, a criminal                  15 crime family? You know, that's what they                  16 do."                  17 When it's all tied together, you have                  18 the cover-up. You got Janet Griswold                  19 there. You've got -- I put the image up                  20 to the world to see. Nobody says anything                  21 about it. Nobody talks about it. Your                  22 suing attack.                  23 When you attack somebody, a company                  24 that has never done anything to you,                  25 that's criminal. You two, it's criminal,</p> <p style="text-align: right;">Page 297</p>

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 3 County's county board election and the  
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 23 you're out running around suing people  
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 Page 294

1 to hide the Mesa County information?  
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 4 maybe Dominion has got other people doing  
 5 it.  
 6 He sued me, and when you sue somebody  
 7 that hasn't done anything, which -- this  
 8 is after the fact. I'm saying this now.  
 9 "You just told me you're part of it,  
 10 Eric Coomer. I was nice before when you  
 11 attacked me over here with Newsmax, and  
 12 you attacked. I just -- right there I  
 13 just called you a traitor, what did you do  
 14 to my company. Now you sue me? I never said  
 15 anything about you. I never knew anything  
 16 about you. But all of a sudden, oh,  
 17 you're the vice president or president of  
 18 Dominion. Now I get it. You're  
 19 Dominion."  
 20 Not only are you suing me for  
 21 billions here; now you got to double down  
 22 and do it some more. But I guess you all  
 23 lawyers -- ambulance-chasing lawyers, you  
 24 all need a piece of the pie. I get that,  
 25 you know. That's nice.  
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1 And you notice what I called you  
 2 guys. It's criminal what you did. For  
 3 you to be able to sue My Pillow.  
 4 Look at My Pillow. What did they do  
 5 to you? Unbelievable.  
 6 Q. So it's your belief that Mr. Cain and  
 7 myself are criminals as well?  
 8 A. What you did is criminal. And not you're  
 9 criminals, but what you've done is  
 10 criminal.  
 11 What you're doing here today is  
 12 criminal. Absolutely criminal. You're  
 13 taking money you don't deserve. You're  
 14 trying to attack people that don't -- have  
 15 done nothing to you. And you're wasting  
 16 my time with a frivolous lawsuit because  
 17 some judge didn't look at this last summer  
 18 and get rid of it and say, 'Are you  
 19 kidding me? You can't sue this guy for  
 20 this because you went and attacked his  
 21 company and got him so he can't go on TV."  
 22 I never talked about Eric Coomer in  
 23 my life until you did that to Newsmax.  
 24 And then you served me papers.  
 25 Everything I said after you served me  
 Page 296

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 2 be part of it, and you guys are just as  
 3 criminal what you did to me. Period,  
 4 that's it.  
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 6 describing here that Mr. Cain and I you  
 7 believe are a part of, who else is in that  
 8 family?  
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 10 know. Haven't checked into that. You  
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 12 don't -- you know, I don't know. Who  
 13 knows? I don't know.  
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 20 to the world to see. Nobody says anything  
 21 about it. Nobody talks about it. Your  
 22 suing attack.  
 23 When you attack somebody, a company  
 24 that has never done anything to you,  
 25 that's criminal. You two, it's criminal,  
 Page 297

1 guys. I can't get around it.  
 2 What you did is terrible. It's evil,  
 3 it's terrible, it's wrong. And that's it.  
 4 Even if you didn't like Chris Ruddy  
 5 over here, what I said after you did that,  
 6 what does that have to do with My Pillow?  
 7 That upsets me more than anything.  
 8 Attack me all you want, but you  
 9 attacked a company that had nothing to do  
 10 with this. You're trying to bury my  
 11 company. That's the only agenda, take  
 12 away all the money, which you've done a  
 13 great job. I have no money left. I had  
 14 to borrow \$10 million. Good job, you  
 15 guys. Great job.  
 16 You've absolutely destroyed people's  
 17 lives. And you sit and tell me how Eric  
 18 Coomer -- you know, Eric Coomer, who I  
 19 knew nothing about until you'd attacked My  
 20 Pillow.  
 21 I used to tell Chris Ruddy, that's  
 22 just disgusting, always has been.  
 23 MR. KLOEWER: I've handed you what  
 24 I've labeled as Exhibit 89.  
 25 (Deposition Exhibit No. 89 was

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1 introduced.)  
 2 BY MR. KLOEWER:  
 3 Q. We looked at something similar to this  
 4 before with respect to interrogatories.  
 5 These are requests for admissions.  
 6 Do you remember working -- and I'll  
 7 give you a minute to read through these to  
 8 see if you recognize this document.  
 9 Interrogatories are more general  
 10 questions that we ask sometimes, and a  
 11 request for admission is just to ask you  
 12 to admit something or to deny it. And we  
 13 asked a series of these.  
 14 Do you remember answering these  
 15 questions?  
 16 A. Let's see. "Admit" -- "Deny," yeah, I  
 17 knew nothing about that.  
 18 "Deny."  
 19 "Deny."  
 20 "Deny."  
 21 "Never contact or attempt to contact  
 22 Dr. Coomer." "Admit."  
 23 Yeah. I answered this. It's 100  
 24 percent the truth. 100 percent.  
 25 Q. Why didn't you ever try to contact

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1 Dr. Coomer?  
 2 A. What's that?  
 3 Q. Why didn't you try to contact Dr. Coomer?  
 4 A. For what?  
 5 Q. To check if the allegations against him  
 6 were true before you published them.  
 7 A. No. You're missing the point. The guy --  
 8 the damage was done. The guy -- the owner  
 9 of Newsmax told me I couldn't come on.  
 10 Q. I understand that.  
 11 A. Okay. Then what do you want me to do?  
 12 Call up Coomer and say, "Hey, will you  
 13 please tell Chris Ruddy to let me on?"  
 14 I really didn't think you guys --  
 15 that he was going to do that. Then it  
 16 became between me and Chris, but you guys  
 17 had done that.  
 18 It was horrible what Coomer did and  
 19 you lawyers to tell him not to have me on  
 20 TV. And you know what, sorry I didn't  
 21 call up Coomer and say, "Will you please  
 22 tell Chris to let me come on."  
 23 Give me a break. Of course, I'm not  
 24 going to do that. I didn't even -- I  
 25 didn't know who Eric Coomer was.

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1 Q. Well, you didn't ask if that was true. I  
 2 told you before I was very surprised by  
 3 your testimony in this issue.  
 4 A. What now?  
 5 Q. You didn't think to ask Eric Coomer if --  
 6 A. Ask him what? Ask him, "Here, Chris Ruddy  
 7 said" --  
 8 Q. You just told Chris Ruddy at his word?  
 9 A. I just made a deal, an agreement, with  
 10 this guy, Eric Coomer, who I -- I mean, I  
 11 go, "Who is he?" "He's with Dominion, and  
 12 you cannot come on TV anymore to talk  
 13 about pillows or anything."  
 14 Mike Lindell specific. Not other  
 15 people: Mike Lindell.  
 16 So maybe you know what, was I  
 17 supposed to call up Eric Coomer and say,  
 18 "Why did you do this agreement?" He made  
 19 an agreement with you. And then it comes  
 20 out -- then it comes out that you -- he's  
 21 saying that there is no evidence because  
 22 of Eric Coomer and Dominion. That's when  
 23 I find out Eric Coomer is with Dominion.  
 24 I go, "What else can Dominion -- what  
 25 else can happen to me? How much can they

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1 A. I reviewed this the night before last.  
 2 I'm sorry. Every day I spend trying  
 3 to save our country and go to paper  
 4 ballot. I don't have time for this crap.  
 5 These lawsuits that pile up and you guys  
 6 do this. As far as I know, maybe you're  
 7 just trying to waste my time.  
 8 Two days I've spent listening to  
 9 this. I don't know Eric Coomer. I've  
 10 told you the two things, and you sit here  
 11 and tell me over and over, "Did you bother  
 12 to read that?" No. That's why I didn't  
 13 read the complaint.  
 14 There is things in my life that are a  
 15 lot more important than frivolous  
 16 lawsuits. The only one -- and I'm not  
 17 blaming you for the frivolous, other than  
 18 you put it up, because it should have been  
 19 done nine months ago when the judge should  
 20 have looked at this and said, "I'm sorry,  
 21 these guys, this is bizarre. Good-bye,"  
 22 and dumped it.  
 23 And the judge didn't do that, and  
 24 that's disgusting that she did not dump  
 25 this.

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1 You guys, maybe you have some that  
 2 are more serious than other. Maybe you  
 3 thought I knew more than I did. Maybe,  
 4 but you didn't ask me. You didn't come  
 5 out and ask me. You didn't come out and  
 6 ask. No. You went after Chris Ruddy and  
 7 said, "Don't put Mike Lindell."  
 8 I never said anything about Coomer in  
 9 my life, and you guys told him not to put  
 10 me on for My Pillow. And then you served  
 11 me papers.  
 12 I never said anything about Coomer.  
 13 Q. Mr. Lindell --  
 14 A. Ever.  
 15 Q. We've been over this --  
 16 A. I know, but why do you keep --  
 17 Q. -- many times.  
 18 A. -- doing this? We've been over this.  
 19 Q. What I'm trying to understand is if you  
 20 know that your statements are inspiring  
 21 people to make death threats against Eric  
 22 Coomer --  
 23 A. They weren't, and they're not.  
 24 Q. -- why wouldn't you stop?  
 25 If you are presented with evidence

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1 that they are, will you stop?  
 2 A. If he shows me that somebody out there,  
 3 will stop what? My statements?  
 4 Q. Yeah.  
 5 A. My statements of what he did to My Pillow?  
 6 If somebody does -- I can't help other  
 7 people. You did this. He did this, you  
 8 guys, and so did you.  
 9 Q. So you think he deserves --  
 10 A. Will I put your names up there in the  
 11 lights tomorrow? Probably not.  
 12 I might put the judge up that she  
 13 didn't deny this, and I believe I'm going  
 14 to do that. I'm going to put the judge up  
 15 there and say, "Why was this not  
 16 dismissed?"  
 17 We asked for her a dismissal. I'm  
 18 looking at this, I was so upset with my  
 19 lawyers, I'm going, "Why wasn't this  
 20 dismissed?"  
 21 This is garbage, I mean, complete  
 22 insanity that you went after people, and  
 23 that lawyer -- and that judge didn't  
 24 dismiss it. But if I put your names out  
 25 there and call people out, I can't help

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1 what other people out there do. This  
 2 is -- you know, if it's really true and  
 3 you did do this. What do you mean?  
 4 Q. So it sounds like you think if Dr. Coomer  
 5 is getting those death threats, then he  
 6 deserves them for what he's done.  
 7 A. No. Nobody deserves death threats.  
 8 You're not listening to what I'm saying.  
 9 Nobody deserve (sic) death threats.  
 10 These bad people -- should people not talk  
 11 about the truth because some crazies out  
 12 there might do death threats?  
 13 Should I -- is it okay that I got  
 14 death threats every day in my family of  
 15 burning down their houses because Dominion  
 16 sued me back in February?  
 17 Is it right that every single box  
 18 store around the country dumped me because  
 19 I said, "Hey, we need paper ballots  
 20 hand-counted"? Is that right?  
 21 I can't help what crazy people do.  
 22 Neither can you.  
 23 Is it wrong that they do that?  
 24 Absolutely. Am I going to quit talking  
 25 because there is people out there that are

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
Civil Action No.: 1:22-cv-01129-WJM

-----  
Eric Coomer, Ph.D.,  
  
Plaintiff,  
  
vs.  
Michael J. Lindell, Frankspeech LLC,  
and My Pillow, Inc.,  
  
Defendants.  
-----

VIDEOTAPED DEPOSITION OF  
MICHAEL J. LINDELL  
Designated Representative of FrankSpeech LLC  
Taken on MARCH 9, 2023  
Commencing at 9:59 a.m.

REPORTED BY: Mari Skalicky, RMR, CRR

1 STATE OF MINNESOTA )  
 : CERTIFICATE  
2 COUNTY OF HENNEPIN )

3 I hereby certify that I reported the  
4 deposition of MICHAEL J. LINDELL on  
5 MARCH 9, 2023 in Minneapolis, Minnesota, and  
6 that the witness was by me first duly sworn to  
7 tell the whole truth;

8 That the testimony was transcribed under  
9 my direction and is a true record of witness  
10 testimony;

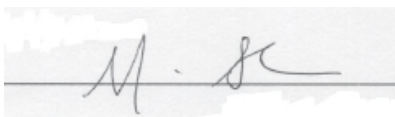
11 That the cost of the original has been  
12 charged to the party who noticed the  
13 deposition, and that all parties who ordered  
14 copies have been charged at the same rate for  
15 such copies;

16 That I am not a relative or employee or  
17 attorney or counsel of any of the parties or a  
18 relative or employee of such attorney or  
19 counsel;

20 That I am not financially interested in  
21 the action and have no contract with the  
22 parties, attorneys, or persons with an  
23 interest in the action that affects or has a  
24 substantial tendency to affect my  
25 impartiality;

That the right to read and sign the  
deposition was reserved.

WITNESS MY HAND AND SEAL this  
23RD DAY OF MARCH 2023.



Mari A. Skalicky  
Registered Merit Reporter  
Certified Realtime Reporter



1 I, MICHAEL J. LINDELL, do hereby certify  
2 that I have read the foregoing transcript of  
3 my testimony and that same is true and correct  
4 to the best of my knowledge and belief, except  
5 as follows:

6

7 PAGE & LINE NO. CORRECTION REASON

8

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14


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20

MICHAEL J. LINDELL

SWORN TO AND

21

SUBSCRIBED BEFORE ME this

day of , 2023

22

NOTARY PUBLIC

23

24

25

Page 324