

# EXHIBIT

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

RUBY FREEMAN, *et al.*,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendants.

Civil Action No. 21-3354 (BAH)

Judge Beryl A. Howell

**DECLARATION OF RUDOLPH GIULIANI IN SUPPORT OF  
RESPONSE TO PLAINTIFFS' MOTION TO COMPEL**

Rudolph Giuliani, hereby declares as follows:

1. My name is Rudolph Giuliani. My date of birth is May 28, 1944.
2. In response to directives from the Court's March 21, 2023 Order and instructions at the conference I appeared at, I conducted the following searches: (1) all of my electronic devices obtained after the April 2021 DOJ seizure for text messages, emails, and other documents; and (2) all of my social media messaging accounts. There were no non-privileged documents on my new electronic devices and all of those privileged documents were created as a result of this litigation. I found one document that we produced on my social media messaging. I used the search terms provided by the Plaintiffs to conduct the search, which I did manually.
3. Prior to this, I searched and produced documents taken from: (1) my paper files; (2) the files that were provided by Christina Bobb; (3) the files that were provided by Christiane Allen; and (4) the email files that were searched on the TrustPoint One server pursuant to Plaintiffs' search terms. The first three categories of documents were all searched for the Dominion litigation

and the January 6<sup>th</sup> Special Committee. The documents we pulled in response included everything related to any 2020 Election issues, which included anything possibly related to the Plaintiffs' claims. We produced all of those documents that were produced in those litigations to Plaintiffs.

4. The TrustPoint One documents consisted of all documents that were extracted from my electronic devices taken by the DOJ in April 2021. The DOJ seized all of my electronic devices in April of 2021. Therefore, the TrustPoint One documents contain all electronic files in my possession, custody, or control as of April 2021. I have no recollection of texting or messaging prior to April of 2021 regarding Plaintiffs or the 2020 Election controversy in Fulton County, Georgia. Any such communications would most likely have been over email, to the extent they ever existed. The TrustPoint One documents were searched for email files in accordance with Plaintiffs' search terms and any non-privileged documents were produced. I do not recall having any further communications regarding Plaintiffs after April 2021, other than on a podcast or two that Plaintiffs are aware of and with my counsel or other legal representatives in connection with this litigation.

5. The TrustPoint One documents have now been archived. I have endured substantial fees and costs in connection with multiple litigations and investigations and I could no longer afford to pay TrustPoint One to keep the documents online. It would cost me over \$320,000.00 to become current on my arrearage with TrustPoint One and to have access to the documents as well costs incurred in searching the documents again for additional files requested by Plaintiffs other than the email files. I do not have the funds to pay this amount at this time.

6. I also do not have access to the server for "giulianipartners.com" or any of the emails associated with that domain that occurred before the April 2021 DOJ seizure. The only person who has an existing email account with that domain is Maria Ryan, who was subpoenaed.

Also, Giuliani Communications does not have a website and I do not have access to emails associated with that account. Moreover, from the electronic devices seized by the DOJ that were returned to me I have not been able to access documents or files. I further do not have access to the iCloud account I had access to “[rudolphgiuliani@icloud.com](mailto:rudolphgiuliani@icloud.com)” that I had access to prior to the DOJ seizure. I have not taken any action to delete or destroy any electronic or paper files.

7. I have searched for phone records in response to Plaintiffs’ Third RFPs and cannot locate any. I have consented to Plaintiffs’ subpoena of the records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in this 1<sup>st</sup> day of May 2023.

*Rudolph Giuliani*

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Rudolph Giuliani