

**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 COMPLIANCE
WITH COURT MINUTE ORDER DATED MAY 19, 2023**

Rudolph Giuliani, hereby declares as follows:

1. My name is Rudolph Giuliani. My date of birth is May 28, 1944.
2. I have conducted the following activities to preserve, collect, and search potentially responsive data and locations that may contain responsive materials to all of plaintiffs' Requests for Production ("RFPs"): (1) Upon receiving notice of potential litigation issues surrounding my involvement in contesting the 2020 Election in late 2020 or early 2021, I confirmed that none of settings on any of my email, messaging, communication, or other document storage platforms were set to auto-delete and, therefore no electronic documents would have been deleted as a matter of course; (2) I have not manually deleted any electronic documents or disposed of any paper files that may have contained responsive materials to the RFPs; (3) in collecting documents responsive to the RFPs, I collected my paper files in my residences and my law office, files my attorneys collected from various sources in connection with litigation matters I was involved in, files from Christiane Allen, Christina Bobb, certain electronic data from TrustPoint One containing data

seized from my electronic devices by the DOJ in April 2021, and new electronic devices I obtained after the seizure, including an iPhone, and iPad, and a laptop computer; (4) these data/file sources were primarily searched by my attorneys in response to requests for production in the *Dominion* litigation, January 6th Committee Subpoena, and requests for discovery in the *Coomer* litigation; (5) I manually searched my new electronic devices and social media accounts.

3. The locations and data that I may have used to communicate about any materials responsive to any of the RFPs were: (1) email accounts [REDACTED]@gmail.com; [REDACTED]@icloud.com; [REDACTED]@protonmail.com); (2) text messaging/iMessaging (347-[REDACTED]; 917-[REDACTED]; 917-[REDACTED]; and rudolphgiuliani@icloud.com); (3) Signal, WhatsApp, and Telegram using the phone numbers 347-[REDACTED]; 917-[REDACTED]; and 917-[REDACTED] as accounts; (4) social media accounts (<https://www.facebook.com/realrudylgiuliani/>; <https://www.youtube.com/c/RudyWGiuliani>; <https://rumble.com/user/TheRudyGiuliani>; <https://twitter.com/RudyGiuliani>; and @therudygiuliani (Instagram handle)); (5) my iCloud account of [REDACTED]@icloud.com ; and (6) the following electronic devices/hardware:

Apple iPhone 11 ProMax (Serial # [REDACTED], IMEI: [REDACTED])

Apple MacBook (Model A22251, Serial # [REDACTED])

Apple iPhone 11 Pro Max (Serial # UNK, IMEI: [REDACTED])

Apple iPad (Model: A1709, Serial # [REDACTED])

Apple iPad (Model: A2013, Serial # [REDACTED])

Blackberry (Model: RGVI6ILW, IMEI: [REDACTED])

Apple iPad (Model: A1395, Serial # [REDACTED])

Apple iPhone 14 (Model: NQ913LLIA, Serial # [REDACTED])

Apple iPad (Model: MH43LLIA, Serial # [REDACTED])

4. The TrustPoint One documents consist of all documents that were extracted from the electronic devices taken by the DOJ in April 2021 when the DOJ seized those devices, which were as follows

Giuliani Partners Office Devices

iMac (Serial # [REDACTED])

MacBook Pro (Serial # [REDACTED])

iPad Model A-1459 (Serial # [REDACTED])

ThinkPad Laptop (Serial # [REDACTED])

These were all devices used by staff at my law firm.

Giuliani Residence Devices

Apple iPhone 11 ProMax (Serial # [REDACTED], IMEI: [REDACTED]) (used by me)

Apple MacBook (Model A22251, Serial # [REDACTED]) (used by me)

Amazon Kindle (Serial # UNK, Model PQ948KJ) (used by me for reading)

Apple iPhone 11 Pro Max (Serial # UNK, IMEI: [REDACTED]) (used by me)

Apple iPad (Model: A1709, Serial # [REDACTED]) (used by me)

Apple iPad (Model: A2013, Serial # [REDACTED]) (used by me)

Blackberry (Model: RGVI6ILW, IMEI: [REDACTED]) (used by me)

Zoom Recording Device (Model: H2M, Serial # [REDACTED]) (used by me for video recordings)

Amazon Device (Serial # UNK, Model: [REDACTED]) (used by me for reading)

Apple MacBook Pro (Model: A1502, Serial # [REDACTED]) (old device of mine pre-dating relevant time frame)

Apple MacBook (Model: A1466, Serial # [REDACTED]) (old device of mine pre-dating relevant time frame)

Apple iPad (Model: A1395, Serial # [REDACTED]) (used by me)

Apple iPhone (Model: A1901, Serial # UNK, IMEI: [REDACTED]) (ex-wife Judith's)

Apple iMac Desktop (Model: A1224, Serial # [REDACTED]) (ex-wife Judith's)

5. These were all of the electronic devices I used as of April 2021 and had in my possession, custody, or control at that time. All of my [REDACTED]@icloud.com iCloud data would have also been included in the TrustPoint data because I synced my iCloud to my devices. The messaging data I had on the devices would have included iMessage, text message, WhatsApp, Signal, and Telegram. I am not sure whether data from my social media accounts of Youtube, Facebook, Instagram, and Twitter were extracted from these devices because I do not recall whether I used website access on my devices for these accounts or whether I accessed them from social media apps. If the access was via the web, no data from social media would have been extracted from the devices. Because we have cured the arrearage with TrustPoint and the data is in the process of being unarchived, we will be able to answer this question in the next week or so.

6. The TrustPoint One documents were searched for email files in accordance with Plaintiffs' search terms and any non-privileged documents were produced for the relevant time frame identified by Plaintiffs. I searched my electronic devices obtained after the April 2021 DOJ seizure and 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 using the Plaintiffs' provided search terms as they were given to me.

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, the January 6th Special Committee, and the *Coomer* litigation. 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. We are preparing to search the TrustPoint database for all files during the relevant time frame beyond simply files with email extensions.

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

Executed on this 30th day of May 2023.

Rudolph Giuliani

Rudolph Giuliani