

Page 1

1 AMERICAN ARBITRATION ASSOCIATION
 2 NEW YORK, NEW YORK
 3
 4 DONALD J. TRUMP FOR PRESIDENT, INC.,
 a Virginia not-for-profit corporation,
 5
 6 Claimant,
 7
 vs.
 8
 9 OMAROSA MANIGAULT NEWMAN,
 an individual,
 Respondent.
 _____/

10
 11
 12 VIDEO-RECORDED DEPOSITION OF ALAN COBB
 Taken on Behalf of the Respondent
 13
 14
 15 DATE TAKEN: Tuesday, March 9, 2021
 TIME: 10:23 a.m. - 11:44 a.m.
 PLACE: By Videoconference
 16
 17
 18 Examination of the witness taken remotely before:
 19 Elizabeth M. Masters
 Registered Professional Reporter
 20
 21

22
 23 RILEY REPORTING & ASSOCIATES
 1300 Riverplace Boulevard, Suite 610
 24 Jacksonville, Florida 32207
 (904) 358-1615
 25 info@rileyreporting.com

Page 2

1 A P P E A R A N C E S
 2
 3
 4 APPEARANCE FOR CLAIMANT
 (Appearing by Zoom)
 5 RYAN J. STONEROCK, ESQUIRE
 Harder LLP
 6 260 Madison Avenue, Sixteenth Floor
 New York, New York 10016
 7 Rstonerock@HarderLLP.com
 8
 9 APPEARANCES FOR RESPONDENT
 (Appearing by Zoom)
 10
 11 JOHN M. PHILLIPS, ESQUIRE
 ERICA JACKSON, ESQUIRE
 Phillips & Hunt
 12 212 North Laura Street
 Jacksonville, Florida 32202
 13 jmp@floridajustice.com
 erica@floridajustice.com
 14
 15
 16 - - -
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 3

1 I N D E X
 2 Video-recorded deposition of Alan Cobb Page
 3
 4 Direct Examination by Mr. Phillips 4
 5 Certificate of Oath 58
 6 Certificate of Reporter 59
 7 Errata Sheet 60
 8 Errata Letter 61
 9
 10 - - -
 11
 12 RESPONDENT'S INDEX PAGE
 13
 14 Letter Description Page
 15 1 Email 18
 16 2 Email 18
 17 3 Email 21
 18 4 Email 24
 19 5 Email 27
 20 6 Video Clip 53
 21 7 Email 53
 22
 23 - - -
 24
 25

Page 4

1 COURT REPORTER: Will all counsel please state
 2 their name and agreement on the record that I may
 3 swear in the witness remotely.
 4 MR. PHILLIPS: John Philips for Omarosa
 5 Manigault Newman, and, yes, we stipulate that you
 6 can swear in the witness remotely.
 7 MR. STONEROCK: And Ryan Stonerock on behalf
 8 of claimant, and we agree as well.
 9 ALAN COBB,
 10 having been produced and first duly sworn as a witness, and
 11 after having responded "I do" to the oath, testified as
 12 follows:
 13 DIRECT EXAMINATION
 14 BY MR. PHILLIPS:
 15 Q Good morning.
 16 A Good morning. Sorry for the delay. That was
 17 my problem on Eastern versus Central time.
 18 Q No problem. Happens all the time. We've got
 19 -- we've got the west coaster over there, too, that had
 20 to get up even earlier. I appreciate y'all all
 21 accommodating us.
 22 Would you please state your full name for the
 23 record.
 24 A Alan Cobb.
 25 Q Mr. Cobb, my name is John Phillips. I

<p style="text-align: right;">Page 5</p> <p>1 represent Omarosa Manigault Newman. Are you familiar 2 with Omarosa? 3 A Yeah. 4 Q Okay. And this is the Alan Cobb that once 5 worked for Donald J. Trump for President, Inc., I 6 assume. 7 A Correct. 8 Q Yeah. So we have the right person. 9 Have you -- when was the last time you had 10 your deposition taken? 11 A I honestly don't know if I ever have. 12 Q Okay. Fair enough. So I'm going to give you 13 just kind of our ground rules for purposes of today. 14 This isn't a normal conversation because, 15 obviously, you've sworn to tell the truth. And so 16 unlike normal conversation, we've got to officially 17 take turns. And we can short-circuit this in -- in, 18 you know, layman's conversation where I kind of 19 anticipate what you're saying, you anticipate what I'm 20 saying. That's a big no-no in a deposition. 21 Secondly, because you've sworn to tell the 22 truth, if you're speculating, if you're guessing, let 23 us know that you're not quite sure on those facts 24 because we want to -- we want to be clear on the 25 record. For that reason, uh-huhs and huh-uhs don't</p>	<p style="text-align: right;">Page 7</p> <p>1 and get through this. 2 Where are you currently employed? 3 A I'm employed as the president and CEO of the 4 Kansas Chamber of Commerce. 5 Q When were you last employed by Donald J. Trump 6 for President, Inc.? 7 A Well, technically, it was all contract. 8 Q Okay. 9 A But it would have gone through, basically, the 10 day after the election, and that would have been 11 potentially November 30th. I can't recall my exact 12 contract. No, I was month to month, so probably the 13 end of November. 14 Q Okay. 15 A November of '16. 16 Q Let me -- let me go back. When did you first 17 work for -- for Mr. Trump, Mr. Trump's family, Mr. 18 Trump's campaign, Mr. Trump's administration, any of 19 the above? 20 A The contract with the campaign started March 21 1, 2015. 22 Q What were you contracted to do? 23 A I was the -- 24 MR. STONEROCK: Vague as to -- vague as to 25 time.</p>
<p style="text-align: right;">Page 6</p> <p>1 quite come out. We do -- we are -- you know, we are on 2 video, and, you know, this is the universal sign for 3 yes, and most people go uh-huh. But it's -- it's one 4 of those little things that the judges, you know, shake 5 their finger at. It's -- you know, we're not clear 6 sometimes. 7 And, finally, if you need to take a break for 8 any reason let us know. This isn't going to be a big 9 marathon day, I don't think. If you don't understand 10 anything that -- that I've asked, you know, let me 11 know. It's absolutely crucial that you understand 12 because we're gonna assume you -- assume you did if you 13 answer the questions. Are all that -- is all that 14 fair? 15 A It is fair. 16 Q Okay. 17 A Understandable. 18 Q Okay. And if you -- if -- like I said, if you 19 need a break, if you need clarification, just let me 20 know; otherwise, I'm just gonna get started and try to 21 get done. Okay? 22 A Okay. 23 Q And don't worry about water. Take as much as 24 you want, or coffee, or whatever. You know, don't -- 25 we're just gonna try to, you know, be comfortable</p>	<p style="text-align: right;">Page 8</p> <p>1 BY MR. PHILLIPS: 2 Q On March 1, 2015, what were you contracted to 3 do? 4 A Essentially to help the campaign manager, 5 Corey Lewandowski, in anything and everything he needed 6 with the campaign. 7 Q Okay. And when did -- when did that contract 8 or, I guess, your final contract with all of the 9 parties that I said, you know, Trump campaign, Trump 10 administration, all of that, when was your final day 11 working for Trump? 12 MR. STONEROCK: Objection, compound. 13 You can answer if you understand it, Alan. 14 THE WITNESS: The -- the day -- technically 15 the day after the campaign. And then I also served 16 in the transition team, which technically would 17 have been working for the -- I think, the federal 18 government. 19 BY MR. PHILLIPS: 20 Q Right. Okay. Did you have any appointed or, 21 I guess, nonappointed positions for the federal 22 government thereafter? 23 A I did not. 24 Q Okay. At what point did -- do you know -- do 25 you know -- have you reviewed the agreement that</p>

Page 9

1 Omarosa Manigault Newman signed?

2 A I have.

3 Q Okay. Did you sign a similar agreement with

4 the -- with the campaign?

5 A I did.

6 MR. STONEROCK: Objection, relevance.

7 You can answer, Alan.

8 THE WITNESS: I did.

9 BY MR. PHILLIPS:

10 Q Okay. And there are going to be objections.

11 And unless -- unless instructed not to answer, just --

12 we're gonna -- you know, you went to law school. I

13 believe the -- you know, lawyers are gonna make their

14 objections. We're gonna try to move through. And if

15 -- if we need those to be ruled on by an arbitrator or

16 a judge, you know, we'll do that down the road.

17 A I understand.

18 Q Did you sign more than one of those

19 agreements?

20 A I do --

21 MR. STONEROCK: Objection due to relevance.

22 Alan, you can answer.

23 THE WITNESS: I do not believe so. I think it

24 was just one.

25 BY MR. PHILLIPS:

Page 10

1 Q Okay. Do you know if it was the same one that

2 Omarosa signed?

3 A I do not.

4 Q Okay.

5 A Hang on. I'm gonna turn my email off because

6 it's popping emails. And I should have done this

7 before. I'm just closing everything here. It's

8 distracting. And I'm sure I'll have 150 unread emails.

9 Okay. Thanks.

10 Q Give me a little bit of your -- of your

11 educational background, if you will, please.

12 A Undergraduate from Wichita State University,

13 bachelor's in general studies, master's of government

14 administration from the University of Pennsylvania, law

15 degree from Washburn University School of Law.

16 Q Have you ever been licensed as a lawyer?

17 A I am currently licensed, and have been since

18 1992.

19 Q In what state? Kansas?

20 A Kansas.

21 Q Okay. Did you provide any, I guess, legal

22 advice related to the subject NDA?

23 A No.

24 Q Okay. Did you provide any edits or -- any

25 edits or revisions of the subject NDA?

Page 11

1 A I did not.

2 MR. STONEROCK: John, do you mean Omarosa's

3 NDA?

4 MR. PHILLIPS: Yes.

5 MR. STONEROCK: Okay.

6 THE WITNESS: No --

7 BY MR. PHILLIPS:

8 Q Okay.

9 A -- I did not.

10 Q Do you know where it came from?

11 A I do not.

12 Q Okay. There's -- what was your working

13 relationship for the -- the Koch brothers, the Koch

14 Industries? Tell me about that, please.

15 MR. STONEROCK: Vague as to time.

16 You can answer, Alan.

17 THE WITNESS: I worked for Koch Industries at

18 their headquarters in Wichita from 1996 to '99.

19 Then with Americans for Prosperity, which is a

20 private 5L1-C4, and Americans for Prosperity

21 Foundation, which is a C3, which is assumed or

22 reported as part of the Koch network, but there's,

23 you know, lots of independent funders, that was

24 from 2004 through, gosh, 2012. And then, in 2013

25 and 2014 worked for the Freedom -- Freedom Partners

Page 12

1 Chamber of Commerce.

2 BY MR. PHILLIPS:

3 Q Okay. I believe it was Michael Cohen -- do

4 you know who Michael Cohen is?

5 A Yes, I know who he is.

6 Q Okay. I believe it was Michael Cohen that

7 indicated at some point that the subject NDA, the NDA

8 that Omarosa signed and some others signed, was either

9 adapted from or acquired from one of the Koch business

10 entities. Do you know anything about that?

11 MR. STONEROCK: Objection, lacks foundation,

12 calls for speculation.

13 You can answer, Alan, if you know.

14 THE WITNESS: Never heard of that --

15 BY MR. PHILLIPS:

16 Q Okay.

17 A -- speculation whatsoever.

18 Q Okay. Fair enough.

19 As we sit here today, do you know who -- who

20 would have drafted the subject NDA?

21 A I do not --

22 MR. STONEROCK: Objection, it calls for

23 attorney work product.

24 You can answer, Alan.

25 THE WITNESS: I do not know.

Page 13

1 BY MR. PHILLIPS:

2 Q Okay. Once you've -- I guess once the

3 campaign kicked off, Omarosa had some working capacity;

4 is that a fair statement?

5 A I'm not aware of any of her work with the

6 campaign until July-August '16.

7 Q Okay.

8 A Well after I started.

9 Q What's a surrogate?

10 A That's someone who represents the campaign on,

11 typically, television shows. I suppose it could be

12 radio or podcast or, et cetera.

13 Q Were surrogates of Donald J. Trump for

14 President, also known as the campaign, compensated?

15 A I do not know.

16 MR. STONEROCK: Calls for speculation, lacks

17 foundation, vague as to time.

18 BY MR. PHILLIPS:

19 Q Okay.

20 MR. STONEROCK: Alan, you can answer.

21 THE WITNESS: I have no idea.

22 BY MR. PHILLIPS:

23 Q Okay. What is your first understanding of --

24 of when Omarosa was -- was brought in to do something

25 for Donald J. Trump for President?

Page 14

1 A I only became aware of it sometime early July

2 2016.

3 Q Okay. And what was she brought in -- were you

4 involved in recruiting her, bringing her aboard,

5 anything like that?

6 A No. So I don't know what she was doing prior

7 to -- when I met her. And I don't recall what her role

8 was or what she did.

9 Q Okay. What was your first, I guess -- and I

10 don't mean personal introduction, but what was your --

11 I guess, as best as you can recall, what's your first

12 understanding or recollection that Omarosa Manigault

13 Newman was going to be affiliated in some way with the

14 campaign or the campaign work?

15 A Probably at the Republican convention when she

16 told me that Paul Manafort had hired her, which, in

17 fact, was not true.

18 Q What did -- I mean, help me understand that.

19 So -- so you ran into her at the RNC, and she indicated

20 that Manafort had retained her. In what capacity?

21 A In some capacity with coalitions,

22 African-American outreach.

23 Q Okay. And how did you determine that was

24 untrue?

25 A Rick Gates called me and made sure I knew that

Page 15

1 there was no truth to that whatsoever.

2 Q Okay. Why is that significant?

3 MR. STONEROCK: Objection, calls for

4 speculation, lacks foundation, vague as to the term

5 "significant," misstates his testimony.

6 You -- you can answer, Alan.

7 THE WITNESS: Can you -- can you repeat the

8 question? I'm sorry.

9 BY MR. PHILLIPS:

10 Q Yes. Sure, sure.

11 You know, I guess, of what significance is

12 that -- was that to you at the time that there was this

13 inconsistency about whether or not Omarosa was -- was

14 retained or -- or brought aboard by Paul Manafort?

15 MR. STONEROCK: Same objections.

16 Go ahead, Alan.

17 THE WITNESS: It exposed her dishonesty.

18 BY MR. PHILLIPS:

19 Q Okay. It -- so how did that lead to her

20 actually being retained by the campaign?

21 A As I'm recalling, she stayed in touch with me

22 July, August, and I think it -- other folks, and just a

23 decision was made to -- to bring her on in -- in -- in

24 a capacity --

25 Q Okay.

Page 16

1 A -- in a coalition thing.

2 Q Gotcha.

3 I'm gonna experiment with trying to bring up

4 some documents here.

5 MR. PHILLIPS: I've learned, Mr. Stonerock.

6 Let's see.

7 MR. STONEROCK: I appreciate that.

8 BY MR. PHILLIPS:

9 Q Alan Cobb email request, let's see what this

10 is. Can you see a document on your screen?

11 A I cannot. I don't think either of us --

12 MR. STONEROCK: We can't see it, John.

13 MR. PHILLIPS: Okay. Let me try this a

14 different way.

15 THE WITNESS: I can see something now.

16 BY MR. PHILLIPS:

17 Q Okay. Do you see an email?

18 A Yes.

19 Q Okay.

20 MR. STONEROCK: John, can you expand that

21 window?

22 MR. PHILLIPS: Sure.

23 MR. STONEROCK: I think that might -- yeah.

24 MR. PHILLIPS: Is it better?

25 MR. STONEROCK: Yeah.

Page 17

1 BY MR. PHILLIPS:

2 Q And ignore the top part. That's just where it

3 was forwarded to me.

4 But do you recall an email of August 8, 2016

5 to Omarosa Manigault where you indicated, "Can you

6 please complete this ASAP. I thought this was already

7 on file since you had done some surrogate work for the

8 campaign"?

9 A Yeah. Yeah. I mean, yeah, that's -- that's

10 obviously my -- an email from me.

11 Q Okay. And acobb@donaldtrump.com was your

12 email address at the time?

13 A Correct.

14 Q Okay. And, again, as of August 8, what was

15 your understanding of surrogates and NDAs? Were

16 surrogates under NDAs?

17 MR. STONEROCK: Objection, compound, calls for

18 speculation, lacks foundation.

19 You can answer if you understand it.

20 BY MR. PHILLIPS:

21 Q Were surrogates -- were surrogates under NDAs?

22 A We -- we --

23 MR. STONEROCK: Same objections.

24 THE WITNESS: We had virtually -- as I recall,

25 everybody signed NDAs, not just surrogates.

Page 18

1 BY MR. PHILLIPS:

2 Q Okay. Are you aware of who -- you know, whose

3 directive that was that everybody should be under an

4 NDA?

5 MR. STONEROCK: Objection, calls for

6 attorney-client communication, calls for attorney

7 work product.

8 Mr. Cobb, you can answer if you know.

9 THE WITNESS: I do not. My direction was from

10 Corey Lewandowski, campaign manager --

11 BY MR. PHILLIPS:

12 Q Okay.

13 A -- for -- for mine.

14 MR. STONEROCK: John, are you gonna mark that

15 as an exhibit?

16 MR. PHILLIPS: Yeah, we will.

17 MR. STONEROCK: Okay.

18 MR. PHILLIPS: We'll mark the -- the first one

19 as Defendant's Exhibit 1 to the deposition.

20 (Respondent's Exhibit 1 was marked for

21 identification.)

22 This will be Defendant's Exhibit 2 to the

23 deposition.

24 (Respondent's Exhibit 2 was marked for

25 identification.)

Page 19

1 And I will provide these to -- to Madam Court

2 Reporter digitally shortly. They will also be on

3 the video record.

4 BY MR. PHILLIPS:

5 Q This is a second email from Omarosa, again, to

6 acobb@donaldtrump.com, dated August 24. It appears

7 this is when she sent her signed agreement to you.

8 Does that appear correct?

9 A It appears correct.

10 Q And what would you do with it once you

11 received this?

12 A As I'm recalling, I believe I would send those

13 to Lucia.

14 Q Okay. Castellano?

15 A Correct. The HR director.

16 Q Okay. What was your role with kind of

17 collecting NDAs or -- or making sure they were -- they

18 were accomplished? Why were you involved?

19 MR. STONEROCK: Objection, calls for

20 speculation, lacks foundation.

21 You can answer, Alan.

22 THE WITNESS: Just for the folks that I was

23 dealing with; that was the only involvement I had.

24 The folks on the campaign, whether it was the

25 primary or post -- post convention.

Page 20

1 BY MR. PHILLIPS:

2 Q Would you have been Omarosa's supervisor?

3 A I don't know that Omarosa really had a

4 supervisor. So I do -- in campaigns you don't really

5 have HR reporting trees like you do in other

6 organizations.

7 Q Okay. Let's see here. Let me stop share and

8 go back. Two, three.

9 Let's try this one. I'm going to present what

10 will be labeled defendant's third exhibit. Let me know

11 when you can see it. Can you see it?

12 A I cannot.

13 Q Let me go back to Zoom and figure out why not.

14 I might have too many windows open.

15 A Okay, I can see that.

16 Q Let me expand it for you.

17 A Yeah, I can see it.

18 Q Okay. It appears to be, you know,

19 "Subject" -- again, this will be Defendant's 3. A

20 message from you, "Subject: Paperwork!" And you say,

21 "Thanks for being so patient with us!"

22 And it appears this is the unsigned version,

23 so this is where you forwarded it to Ms. Manigault

24 Newman. Does that sound -- does that sound and look

25 correct?

<p style="text-align: right;">Page 21</p> <p>1 A It sounds and looks correct. 2 (Respondent's Exhibit 3 was marked for 3 identification.) 4 BY MR. PHILLIPS: 5 Q Okay. What did you mean, "Thanks for being so 6 patient with us"? 7 A I tend to believe that sugar goes further than 8 vinegar. And, frankly, she had been kind of aggressive 9 on all of this. And we had some internal 10 conversations, as I'm recalling, whether to even -- to 11 bring her on in an official capacity. 12 So trying to be nice, and we're gonna bring 13 her on, let's set the stage so we're all acting 14 professionally. 15 Q Okay. Explain what you mean about -- about, I 16 guess, concerns. 17 A Oh, I -- 18 MR. STONEROCK: Objection, misstates his 19 testimony. 20 BY MR. PHILLIPS: 21 Q Explain what you mean about the internal con- 22 -- tell me about the internal conversations you were 23 having. 24 A How -- there were budget issues, there were -- 25 were issues and concerns that other folks who had dealt</p>	<p style="text-align: right;">Page 23</p> <p>1 single person who -- who did it. 2 BY MR. PHILLIPS: 3 Q Had she been doing surrogate work before 4 August 24, 2016 for the campaign? 5 A I don't know. One thing I was gonna mention, 6 which I think is relevant, is, of course, there's lots 7 of people that were Trump supporters out on television 8 and radio that weren't necessarily affiliated with the 9 campaign, and I don't know if that was what she was 10 doing prior to our official engagement or not. 11 Q And just to go back to the -- I guess the 12 prior email. Nope. The one before that. And I 13 thought you were on file -- the -- the August 8 email, 14 "I thought this was already on file since you had done 15 some surrogate work for the campaign." 16 What was your basis of understanding, then, 17 that she had done some surrogate work for the campaign? 18 A As I'm recalling, I think some folks said she 19 had been out on media talking because of her -- talking 20 about Donald Trump because of her previous 21 relationship. 22 I would say that's probably kind of a 23 euphemism. A surrogate can have -- have a -- can have 24 a lot of different -- different -- different -- not a 25 lot, but certainly a couple different interpretations.</p>
<p style="text-align: right;">Page 22</p> <p>1 with Omarosa that expressed to me how good of a team 2 player she would be, et cetera. Is she worth the 3 trouble, frankly? And I had not, except for a 4 couple -- and I actually knew exactly what they were 5 talking about given my -- my interactions with her 6 where she told me that Manafort had hired her when she 7 [sic] had not. 8 Q Okay. Had you met her at this point, by 9 August 24? 10 A I met her -- the first time I met her was 11 in -- sometime early July at the RNC. 12 Q Okay. 13 A That's the first time I had met her. 14 Q Had you met her -- had you -- had you been in 15 her presence after that? 16 A Just at the RNC, at the convention. 17 Q Whose decision was it to bring Ms. Manigault 18 Newman on board? 19 MR. STONEROCK: Vague as to time, calls for 20 speculation, lacks foundation. 21 You can answer if you understand, Alan. 22 THE WITNESS: As I'm recalling, just 23 several -- several folks just decided, okay, we 24 can -- she might be an asset to the campaign. 25 Let's bring her on. I don't know that it was a</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Okay. And then this will be, I believe, 2 Defendant's 4, which is another email dated July 26 3 from acobb@donaldtrump.com to Omarosa. And it's -- 4 it's a chain, so you probably need to go down to the 5 bottom of the chain, which would be -- 6 MR. STONEROCK: John, will this be Exhibit 4? 7 MR. PHILLIPS: Yes, Defendant's Exhibit 4. 8 (Respondent's Exhibit 4 was marked for 9 identification.) 10 BY MR. PHILLIPS: 11 Q -- from Omarosa to Alan Cobb. "Subject: 12 Start Paper Work. 13 "Can you let me know when I will get my NDA 14 and paper work. Also can you give me an official date 15 for my announcement. I want to get the statement from 16 DJT for the statement. 17 "Omarosa." 18 Do you -- do you -- do you -- is this an email 19 sent between you and Omarosa? 20 A It appears to. I'm not -- I can't say I 21 recall that specific email. 22 Q Okay. 23 A But, yes, that's obviously to me. 24 Q And at least as of July 25th, does it seem 25 that Omarosa was trying to get paperwork from you or</p>

<p style="text-align: right;">Page 25</p> <p>1 the campaign?</p> <p>2 A Yes. I think the relevance would be the date</p> <p>3 of the RNC, and I just don't remember those dates, if</p> <p>4 that coincides with that or not.</p> <p>5 Q Okay. And then there appears to be a response</p> <p>6 the same day: I inquired via email. I will be in New</p> <p>7 York City tomorrow and can inquire. What are you</p> <p>8 thinking as to timing? Next week? Or maybe have</p> <p>9 something ready based upon what happens at the DNC?</p> <p>10 Do you recall that email?</p> <p>11 A I recall it because I'm looking at it. I --</p> <p>12 obviously, it's been a while.</p> <p>13 Q And then the next day Omarosa, I guess, back</p> <p>14 to you, "Any update in my start paperwork? Did you</p> <p>15 speak to Lucia?"</p> <p>16 And then back to the last segment of this one,</p> <p>17 "I haven't. My meetings all delayed. Will advise."</p> <p>18 Do you remember anything about this email</p> <p>19 chain?</p> <p>20 A I don't remember. Maybe the subject, but not</p> <p>21 the email chain specifically, what -- what are we gonna</p> <p>22 do with Omarosa? What are we -- I would -- I had been</p> <p>23 named coalition director and was trying to get some</p> <p>24 direction from campaign hierarchy about how we're gonna</p> <p>25 structure things.</p>	<p style="text-align: right;">Page 27</p> <p>1 Lewandowski would not have been the campaign manager</p> <p>2 for Donald J. Trump for President, Inc.?</p> <p>3 A Correct.</p> <p>4 Q Did you and Ms. Newman work on any projects</p> <p>5 together?</p> <p>6 A I'm recalling that we worked together on</p> <p>7 Donald Trump's appearance -- I was trying to get the</p> <p>8 right word -- appearance at an African-American church</p> <p>9 in Detroit.</p> <p>10 Q Okay.</p> <p>11 A Which would have been Labor Day-ish or Labor</p> <p>12 Day weekend.</p> <p>13 Q Who was -- and -- and I've --</p> <p>14 MR. STONEROCK: John -- John, I'm sorry to</p> <p>15 interrupt you. Do you want him to take a look at</p> <p>16 this email that you have on the screen?</p> <p>17 MR. PHILLIPS: I was getting there.</p> <p>18 MR. STONEROCK: Okay.</p> <p>19 MR. PHILLIPS: We'll attach it as Plaintiff's</p> <p>20 5 -- or Defendant's 5.</p> <p>21 (Respondent's Exhibit 5 was marked for</p> <p>22 identification.)</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Who was -- and I have some questions about it.</p> <p>25 Who was Laura Hilger?</p>
<p style="text-align: right;">Page 26</p> <p>1 Q Okay. Who would you have been conferring</p> <p>2 with? And you indicate, "I inquired via email,"</p> <p>3 and I'll inquire in -- in -- in New York City. Who --</p> <p>4 who would have been your source of contact on these</p> <p>5 issues?</p> <p>6 A As I recall, it would have been Rick Gates.</p> <p>7 Q Okay. And what was Rick Gates's role at the</p> <p>8 time?</p> <p>9 A I don't know what his title was. He was kind</p> <p>10 of Paul Manafort's right-hand man.</p> <p>11 Q Okay. At what point was there a transition</p> <p>12 between Manafort and Lewandowski?</p> <p>13 A Well, Manafort was brought on in April to</p> <p>14 manage the convention and do some of the delegate chase</p> <p>15 stuff. Corey was let go June. I'm not gonna remember</p> <p>16 the date. And I don't know if Manafort's title</p> <p>17 changed, because his title was kind of chair or</p> <p>18 something. And titles in campaigns don't mean a lot.</p> <p>19 Q Right.</p> <p>20 A So I -- but for practical purposes, it would</p> <p>21 have been after Corey was let go in June.</p> <p>22 Q Okay.</p> <p>23 A And I don't remember if that was mid-June,</p> <p>24 late June, early June. I just don't remember.</p> <p>25 Q So by July, certainly, of 2016, Corey</p>	<p style="text-align: right;">Page 28</p> <p>1 A I do not remember.</p> <p>2 Q Okay. Who was Avrahm Berkowitz?</p> <p>3 A As I'm recalling, he worked with Brad Parscale</p> <p>4 on data -- data, voter data.</p> <p>5 Q Okay. If -- I mean, it looks like from the</p> <p>6 email -- on the beginning of this email it's s -- Laura</p> <p>7 Hilger is identified at sclgroup.cc. Do you know what</p> <p>8 that is?</p> <p>9 A I do not.</p> <p>10 Q And at the end, she's got two emails. One is</p> <p>11 cambridgeanalytica.org and the other one is</p> <p>12 sclgroup.cc. Do you know what Cambridge Analytica is?</p> <p>13 A Yeah, it was a -- it's a data firm. That's</p> <p>14 probably the extent of my knowledge.</p> <p>15 Q Okay. And it appears -- let me -- it's a</p> <p>16 six-page email. It appears that there's -- there's</p> <p>17 some back -- back and forth about African-American</p> <p>18 outreach and statistics involving, I guess, a</p> <p>19 simultaneous email to you and Omarosa Manigault -- at</p> <p>20 the time Manigault, now -- no Manigault Newman. Do you</p> <p>21 recall this -- you know, this project, I guess?</p> <p>22 A Kind of vaguely now that I see it. We were</p> <p>23 simply looking in the battleground states in</p> <p>24 African-American communities on normal campaign nuts</p> <p>25 and bolts, out -- engagement outreach turnout,</p>

<p style="text-align: right;">Page 29</p> <p>1 and trying to figure out where the African -- the 2 African-American community was in the presidential 3 race. 4 Q On this aspect of the campaign, did you have 5 any concerns about Ms. Manigault Newman's honesty or 6 integrity? 7 A No. 8 Q Can you identify any issue with the campaign 9 other than the Paul Manafort comment where you found, I 10 guess, any impropriety or dishonesty by Ms. Manigault 11 Newman? 12 A I think when she came on -- no. 13 Q Okay. 14 MR. STONEROCK: John, are you going to ask him 15 more questions about this email? It's just -- it's 16 a little difficult to focus when you're -- when 17 you're scrolling through it, and I think -- 18 MR. PHILLIPS: Yeah, I don't -- it was just 19 kind of a refresh the recollection, trying to 20 understand who the players were involved. 21 BY MR. PHILLIPS: 22 Q I didn't get -- Mr. Cobb, I didn't get a lot 23 of email produced to me by either my client or the 24 campaign involving my client. Do you know how much, I 25 guess, email traffic there would have been between you</p>	<p style="text-align: right;">Page 31</p> <p>1 BY MR. PHILLIPS: 2 Q Okay. Do you know if the NDA Omarosa signed 3 is -- is -- well, let me -- let me ask it this way. 4 Did you have any discussions at the -- at -- at -- you 5 know, while employed by the campaign about whether, 6 essentially, the -- the NDA language, the nondisclosure 7 language, is valid? 8 MR. STONEROCK: Lacks foundation, calls for a 9 legal conclusion. 10 You can answer if you know. 11 THE WITNESS: I did not. 12 BY MR. PHILLIPS: 13 Q I'm gonna play a three-minute clip of Corey 14 Lewandowski talking about the -- the NDAs of the 15 campaign and then after, and then I'll have some 16 questions about it. So bear with me. And it's -- it's 17 about three minutes. 18 (Playing of video-recording as follows:) 19 AP REPORTER: Corey, we've learned a lot in 20 the last few days and weeks about nondisclosure 21 agreements both from the -- on the Trump campaign 22 and the White House and political organizations. 23 So, first, could you say if you've signed a 24 nondisclosure agreement with the president, number 25 one; and then, number two, does the practice of</p>
<p style="text-align: right;">Page 30</p> <p>1 and Omarosa during the few months she was involved with 2 the campaign? 3 A I don't think a whole lot. 4 MR. STONEROCK: Speculation, lacks foundation. 5 I also -- John, I hadn't seen that document 6 produced before on -- from your end. I presume you 7 got that from your client. We don't have -- I've 8 never seen that document. It wasn't produced to 9 us. 10 MR. PHILLIPS: Well, it doesn't really involve 11 the NDA and -- and all of that. I mean, I'm happy 12 -- it's -- it's gonna be attached as -- as an 13 exhibit here, and I'll send it to you. 14 MR. STONEROCK: Understood. 15 BY MR. PHILLIPS: 16 Q Did you have any conversations with Corey 17 Lewandowski about nondisclosure agreements related to 18 the campaign? 19 MR. STONEROCK: I'm sorry. I'm sorry. I 20 didn't hear that. Nondisclosure agreements related 21 to what, John? 22 MR. PHILLIPS: The campaign. 23 THE WITNESS: All I'm recalling is the folks 24 that we got engaged in the various states that 25 Corey was head, everybody signs an NDA.</p>	<p style="text-align: right;">Page 32</p> <p>1 having nondisclosure agreements by -- particularly 2 for people who serve in the administration, but 3 also on the campaign, undermine the credibility of 4 people who serve on the president's behalf in that 5 they are contractually prohibited from being 6 critical of the president in many of these cases? 7 MR. LEWANDOWSKI: So when I joined the 8 campaign, which was January of 2015, I actually 9 signed a nondisclosure agreement which was with a 10 precursor to the campaign, just for legal reasons, 11 because the campaign didn't even exist at the time. 12 And as I think you all know, I wrote a book, 13 and there was no pushback on the book. And I think 14 my book was a very honest assessment of my time on 15 the campaign trail, good, bad, or indifferent. 16 And I -- I was never contacted by the Trump 17 team or the Trump attorneys to say you can't write 18 a book. You can't do any of these things. I was 19 -- I was very honest. I didn't have to submit my 20 book or a proposal or any of those things to them 21 for their review or their consideration. 22 As it relates to a nondisclosure agreement for 23 government employees -- and I'm not an attorney, 24 just to be clear -- I don't know if they're valid 25 whatsoever. Other than the disclosing of</p>

Page 33

1 classified information -- which is a crime in and
 2 of itself and has nothing to do with a
 3 nondisclosure agreement -- I don't know how you
 4 hold a public employee, a government employee,
 5 accountable to a nondisclosure agreement. I don't
 6 know if that's enforceable whatsoever. I have no
 7 idea.

8 And -- and I think the issue is it has been a
 9 long-term business practice of the Trump
 10 administration -- of the Trump organization to have
 11 nondisclosure agreements. And it's something that
 12 they brought to the administration. I don't know
 13 who signed them, I don't know who didn't sign them.
 14 I've never seen one because I didn't work for the
 15 government in any capacity there. But I don't know
 16 if they're enforceable.

17 And what I think it is, is probably the
 18 president wanting to bring a business executive
 19 experience to the government. And that was one of
 20 the things that he brought with him, which was this
 21 is something that I did in the private sector, and
 22 something I am wanting to implement in the
 23 government sector. I just don't know if they're
 24 enforceable.

25 AP REPORTER: And somebody who signed it and

Page 34

1 is prohibited under a nondisparagement clause from
 2 saying anything critical of the president, doesn't
 3 that impeach everything else that they say?

4 MR. LEWANDOWSKI: And I don't -- look, I don't
 5 know how enforceable any of them are, to be honest
 6 with you. Traditionally nondisclosure agreements
 7 and noncompete agreements are so that you can't
 8 steal business from one company and take it to
 9 another company or you have proprietary information
 10 as a -- as a business owner that would preclude you
 11 from going to a competitor. I don't know how you
 12 can stop somebody from saying something that they
 13 want to say about somebody.

14 Once you leave the employment of that
 15 individual, there are some rules that you've chosen
 16 to sign onto when you started the employment. But
 17 you do have the right to free speech. You have the
 18 -- you do have the right to talk to people. You
 19 have the right to publish a book if you want to or
 20 -- or say what you want or -- or pen an article. I
 21 don't know how you can stop that from happening.

22 And the recourse seems to be through
 23 arbitration, is what it seems to be, because I
 24 don't think it's a court issue. I think they go to
 25 arbitration and try and find a monetary penalty

Page 35

1 which that person would then be responsible for if
 2 they were in breach of their nondisclosure
 3 agreement.

4 I don't know if that's been successfully used
 5 in the past, but we've now seen multiple
 6 individuals who have either signed nondisclosure
 7 agreements and broken them or completely
 8 disregarded them, and so we'll see what the
 9 enforcement mechanism is.

10 (End of playing of video-recording.)

11 BY MR. PHILLIPS:

12 Q Related to that conversation, is there
 13 anything that that refreshes your recollection about
 14 about any conversations you had with Corey Lewandowski
 15 about the agreements, nondisclosure agreements,
 16 nondisparage agreements, related to the Trump campaign?

17 A It does not. I'm not recalling having any of
 18 those conversations with Corey.

19 Q Okay.

20 MR. STONEROCK: John, do you know the date of
 21 that clip?

22 MR. PHILLIPS: It's -- it's in our motion. I
 23 can -- I can pull it for you. It is in our
 24 original -- it's -- it's been cited throughout.
 25 But I'll get it for you.

Page 36

1 BY MR. PHILLIPS:

2 Q Mr. Lewandowski talks about pushback. And he
 3 said he wrote a book, and he's never had any of the
 4 Trump lawyers, government lawyers, or -- or Trump, you
 5 know, team Trump, come after him or say anything.

6 Is that your experience as well? Have you had
 7 anybody try to enforce your NDA or nondisparage
 8 agreement?

9 MR. STONEROCK: Objection, relevance, calls
 10 for speculation, lacks foundation, calls for a
 11 legal conclusion, calls for attorney-client
 12 privileged communications and attorney work
 13 product.

14 You can answer, Mr. Cobb, if you know.

15 THE WITNESS: I haven't, but I haven't
 16 violated it.

17 BY MR. PHILLIPS:

18 Q Okay. And given you indicate you haven't
 19 violated it, what's your understanding of the
 20 nondisparagement provision that you signed?

21 MR. STONEROCK: Objection, calls for a legal
 22 conclusion.

23 If you want to ask him about the
 24 nondisparagement provision in Ms. Manigault
 25 Newman's agreement, go ahead. His agreement's not

Page 37

1 even in front of us. It has no relevance to this
 2 case. So I'm not sure where you're going with
 3 this, John.
 4 BY MR. PHILLIPS:
 5 Q Do you know whether your nondisparage
 6 agreement is different from the one Omarosa Manigault
 7 Newman signed?
 8 MR. STONEROCK: Objection, asked and answered.
 9 You can answer again.
 10 THE WITNESS: I do not. But I have no reason
 11 to believe it's different.
 12 BY MR. PHILLIPS:
 13 Q Okay. Assuming if -- if it will -- if you
 14 will, that it's the same, what is your understanding
 15 of -- of -- you know, Corey Lewandowski was talking
 16 about kind of trying to figure out where the line is
 17 and where it's enforceable. And I guess that's what
 18 I'm trying to understand. For somebody that actually
 19 presented this to Omarosa Manigault Newman to sign,
 20 what your understanding -- and as somebody who signed
 21 it themselves, what's your understanding of the
 22 nondisparage provisions that -- that -- that you were
 23 bound by and you were attempting to get her to be bound
 24 by?
 25 MR. STONEROCK: Objection, compound, calls for

Page 38

1 a legal conclusion.
 2 You can answer if you understand the question.
 3 THE WITNESS: Don't say bad stuff.
 4 BY MR. PHILLIPS:
 5 Q Okay. Does that include Donald Trump as
 6 president of the United States?
 7 MR. STONEROCK: Objection, incomplete
 8 hypothetical, calls for speculation, lacks
 9 foundation, calls for a legal conclusion, it's
 10 vague and ambiguous.
 11 You can answer if you understand the question.
 12 THE WITNESS: I would think it -- I think it
 13 would.
 14 BY MR. PHILLIPS:
 15 Q Okay. And there's also a term in there about
 16 confidential information. Are you familiar with that?
 17 A Generally.
 18 Q Okay. Have you been involved with any -- I
 19 guess were you personally involved in any corrections
 20 or reprimands of anybody or -- or seeking to enforce
 21 any of these terms where you individually, on behalf of
 22 the campaign, went to somebody and said: You know,
 23 you're getting close to the line here either in
 24 violating confidential information or nondisparage?
 25 MR. STONEROCK: Objection, calls for

Page 39

1 attorney-client communications and attorney work
 2 product privileged information.
 3 You can answer.
 4 THE WITNESS: No, not that I'm recalling.
 5 BY MR. PHILLIPS:
 6 Q Okay. How -- I mean, you said "Don't say bad
 7 stuff." You know, is it don't say bad stuff that's
 8 untruthful, or don't say bad stuff regardless about --
 9 about the people referenced in the agreement?
 10 MR. STONEROCK: Calls for a legal conclusion,
 11 incomplete hypothetical, lacks foundation.
 12 You can answer if you understand the question,
 13 Mr. Cobb.
 14 THE WITNESS: I think it's pretty clear don't
 15 say bad stuff, period.
 16 BY MR. PHILLIPS:
 17 Q Okay. Or what?
 18 MR. STONEROCK: Objection, incomplete
 19 hypothetical, calls for a legal conclusion, vague
 20 and -- vague and ambiguous, lacks foundation.
 21 You can answer it, Mr. Cobb, if you understand
 22 it.
 23 THE WITNESS: Then it causes a violation of
 24 the agreement.
 25 BY MR. PHILLIPS:

Page 40

1 Q Okay. As we sit here today -- and -- and,
 2 obviously, you haven't been with the campaign in a
 3 while, so I expect I know this answer -- but do you
 4 know how the campaign was damaged by Omarosa Manigault
 5 Newman?
 6 MR. STONEROCK: Calls for a legal conclusion,
 7 calls for attorney work product privileged
 8 information, calls for expert testimony, incomplete
 9 hypothetical.
 10 You can answer if you understand.
 11 THE WITNESS: I think some of her outrageous
 12 comments on some of the national TV shows certainly
 13 could be considered damaging.
 14 BY MR. PHILLIPS:
 15 Q Okay. Like what?
 16 A I don't have the transcript --
 17 MR. STONEROCK: Same objections.
 18 THE WITNESS: I don't have the transcript in
 19 front of me, but said, it seems to me, lots
 20 and lots on her book tour, lots and lots of --
 21 there's no other way to classify it -- negative
 22 things about Donald Trump. And I'm not recalling
 23 now about family, et cetera, but certainly Donald
 24 Trump.
 25 BY MR. PHILLIPS:

Page 41

1 Q Does it matter if those negative things are
 2 truthful or not?
 3 MR. STONEROCK: Calls for a legal conclusion,
 4 incomplete hypothetical, lacks foundation.
 5 You can answer it if you have an opinion, Mr.
 6 Cobb.
 7 THE WITNESS: In my opinion, no, it does not.
 8 BY MR. PHILLIPS:
 9 Q Have you given speeches?
 10 A I gave a lot of them.
 11 MR. STONEROCK: Objection, vague --
 12 MR. PHILLIPS: You're right, you're right.
 13 MR. STONEROCK: -- about speeches.
 14 MR. PHILLIPS: Of course he has.
 15 BY MR. PHILLIPS:
 16 Q Have you given speeches since leaving the
 17 Trump campaign about your time on the Trump campaign?
 18 A Not specifically. Because as the president of
 19 the chamber to talk about Kansas economy, et cetera,
 20 I'm almost always asked a question about it.
 21 Q Okay. Do you recall in a speech joking about
 22 whether or not Donald Trump could write his own
 23 speeches?
 24 A I do not recall anything like that.
 25 Q Okay. Did you write some of Donald Trump's

Page 42

1 speeches?
 2 A The announcement speech, Corey and I
 3 and probably others --
 4 MR. STONEROCK: Objection.
 5 Hang on -- hang on one second.
 6 John, what's the relevance of this question?
 7 Because you're getting into confidential campaign
 8 issues that, in my view, frankly, have nothing to
 9 do with this case. And if you -- can you -- if you
 10 could articulate for me how this is relevant to --
 11 you know, to the case at all, then maybe I'll let
 12 him answer it; otherwise, I'm gonna have to, you
 13 know, instruct him not to answer it.
 14 MR. PHILLIPS: I mean, I've got a 45-minute
 15 clip I'm trying to -- to -- to not necessarily go
 16 through. Let's see.
 17 BY MR. PHILLIPS:
 18 Q Do you recall speaking -- let me find it here.
 19 Do you recall speaking before the Wichita Pachyderm
 20 Club?
 21 A I do.
 22 Q Okay. Do you recall saying anything negative
 23 about Donald Trump in that speech?
 24 A I do not.
 25 Q If you did, would you feel that you were in

Page 43

1 breach of the agreement you signed?
 2 MR. STONEROCK: Objection, misstates his
 3 testimony, calls for a legal conclusion, incomplete
 4 hypothetical, also irrelevant to this case.
 5 BY MR. PHILLIPS:
 6 Q You can answer.
 7 A Repeat the question.
 8 Q Yeah. I asked if you recalled giving a
 9 speech. You said you did. And I said: Do you recall
 10 giving anything negative, and you said you didn't. I
 11 said: If you did, would you have been in breach of the
 12 agreement?
 13 MR. STONEROCK: Objection, calls for a legal
 14 conclusion, incomplete hypothetical, totally
 15 irrelevant to this case.
 16 Mr. Cobb, you can answer if you understand.
 17 THE WITNESS: I don't -- yeah, I guess I'm not
 18 understanding the relevance.
 19 MR. PHILLIPS: Selective enforcement,
 20 selective enforcement is the relevance.
 21 BY MR. PHILLIPS:
 22 Q Isn't it -- isn't it true that Donald Trump
 23 commonly selectively enforces this agreement?
 24 A I --
 25 MR. STONEROCK: Objection, calls for

Page 44

1 speculation, lacks foundation, vague and ambiguous
 2 as to selectively enforce, incomplete hypothetical.
 3 You can answer if you understand, Alan.
 4 THE WITNESS: I have -- I have no idea.
 5 BY MR. PHILLIPS:
 6 Q Okay. Do you know of others where this
 7 agreement has been enforced? Have you -- have you been
 8 involved in any other cases?
 9 A I have not.
 10 Q Okay. Would it -- so let's take, for example,
 11 the -- the Access Hollywood incident. Donald Trump's
 12 walking around with Billy Bush. A recording is made
 13 where Donald Trump says: I don't even wait. And when
 14 you're a star, they let you do it. You can do
 15 anything. Grab them by the pussy. You can do
 16 anything. Excuse my language there.
 17 So is it your understanding under the
 18 agreement that somebody couldn't have a -- somebody who
 19 signed the agreement couldn't have that conversation,
 20 couldn't talk about that?
 21 MR. STONEROCK: Objection, calls for a legal
 22 conclusion, incomplete hypothetical, lacks
 23 foundation.
 24 You can answer if you understand the question,
 25 Mr. Cobb.

Page 45

1 I think he's frozen.

2 THE WITNESS: Ryan --

3 MR. STONEROCK: Okay. You're back, Alan.

4 Your video was --

5 THE WITNESS: I'm sorry. I'm getting an

6 Internet -- I'm getting an Internet connection

7 unstable, which I'm showing I have plenty of

8 strength on my home Wi-Fi.

9 I think conversations are vastly different

10 than being in a public forum of some kind.

11 BY MR. PHILLIPS:

12 Q Why so?

13 MR. STONEROCK: Objection, calls for a legal

14 conclusion, incomplete hypothetical.

15 You can answer if you understand it, Alan.

16 THE WITNESS: I don't -- it's very clear

17 they're just different.

18 BY MR. PHILLIPS:

19 Q Are they different under the agreement?

20 MR. STONEROCK: Objection, calls for a legal

21 conclusion, incomplete hypothetical.

22 You can answer if you understand.

23 THE WITNESS: I'd have to have the agreement

24 in front of me and look at each word, each -- each

25 of the clauses of the agreement.

Page 46

1 BY MR. PHILLIPS:

2 Q I'm wondering if I can enable you to scroll.

3 Can you scroll? Probably not.

4 A No.

5 MR. STONEROCK: John, there -- there is a way

6 you can do it.

7 MR. PHILLIPS: I think I saw it when I

8 started.

9 MR. STONEROCK: So -- so, Alan, if you go

10 under View Options at the top of your screen --

11 THE WITNESS: Yes.

12 MR. STONEROCK: -- and go down to Request

13 Remote Control, I think if you do that it allows --

14 it would allow --

15 MR. PHILLIPS: Oh, I can do it. Give

16 Mouse/Keyboard Control to Alan Cobb.

17 MR. STONEROCK: Yeah, there you go.

18 THE WITNESS: Oh, great, now my mouse is . . .

19 BY MR. PHILLIPS:

20 Q Let's see. Let me see if I can get back here.

21 A It says I'm controlling your screen.

22 Q And I'm trying to get back to Zoom so we're --

23 let me stop share. Let me start over for a second.

24 MR. STONEROCK: John, can we take a break for

25 just two minutes?

Page 47

1 MR. PHILLIPS: Yeah. We've -- we've gone an

2 hour. Let's -- let's take a -- just take five.

3 MR. STONEROCK: Okay. Great.

4 (Break from 11:16 a.m. to 11:24 a.m.)

5 BY MR. PHILLIPS:

6 Q Is there something allowing you control now,

7 Mr. Cobb?

8 A Oh, hang on. Okay. It says "Give Up Remote."

9 Oh, yeah. So it's working.

10 Q You've got my computer. So if you scroll

11 down, this should be the Agreement. And then there's,

12 as you get into, I believe, page 1 -- so go up -- page

13 1 is disparagement, page 2 is confidential information.

14 Let me ask this question. What was your

15 understanding of what was -- what did the campaign -- I

16 mean, were there any conversations you were a part of

17 where the campaign defined or discussed what

18 confidential information was sought to be protected by

19 the subject agreement?

20 MR. STONEROCK: Objection, calls for legal

21 conclusion, calls for attorney-client

22 communications and attorney-client work product

23 information, the document speaks for itself.

24 John, as you know, there is a definition of

25 confidential information in the document.

Page 48

1 But, Alan, if you've had any conversations

2 with nonlawyers about the meaning of confidential

3 information, you can testify.

4 THE WITNESS: I'm not recalling I had any of

5 those conversations.

6 BY MR. PHILLIPS:

7 Q Okay. The same question as to the

8 nondisparage language on page 2.

9 A I'm not recalling that.

10 MR. STONEROCK: Same objection.

11 THE WITNESS: Yeah, I'm not recalling any

12 conversations.

13 BY MR. PHILLIPS:

14 Q Okay. So where we were before the break was

15 there's a topic at hand involving the president of the

16 United States, and I -- we were trying to distinguish

17 whether somebody who worked for the campaign could talk

18 about it amongst their friends or to a national

19 audience, and it -- you -- you indicated you -- you

20 would like to review the agreement to determine your

21 answer for that, I believe.

22 A Yeah.

23 MR. STONEROCK: Objection, it misstates his

24 testimony, calls for a legal conclusion.

25 I'm not sure I understand the question. But

<p style="text-align: right;">Page 49</p> <p>1 you can answer it if you understand, Alan.</p> <p>2 THE WITNESS: I think there's something in</p> <p>3 here that talks about public disclosure or has a</p> <p>4 definition. But this -- the scrolling is a little</p> <p>5 clunky. And I would have to look at it whether</p> <p>6 it's on the confidential or disparagement or both.</p> <p>7 MR. STONEROCK: The disparagement provision,</p> <p>8 Alan, if you scroll up --</p> <p>9 THE WITNESS: Oh.</p> <p>10 MR. STONEROCK: -- it's paragraph 2, I</p> <p>11 believe.</p> <p>12 THE WITNESS: Okay. Gosh darn it, it's</p> <p>13 scrolling too fast.</p> <p>14 MR. STONEROCK: And I'm just gonna object.</p> <p>15 It, you know, calls for a legal conclusion, the</p> <p>16 document speaks for itself.</p> <p>17 But if you have an understanding, Alan, you</p> <p>18 can testify as to it.</p> <p>19 THE WITNESS: It does speak for itself, and it</p> <p>20 says "disparage publicly."</p> <p>21 BY MR. PHILLIPS:</p> <p>22 Q Were there any conversations you were involved</p> <p>23 as to what publicly meant with regard to this</p> <p>24 agreement?</p> <p>25 MR. STONEROCK: Objection, calls for</p>	<p style="text-align: right;">Page 51</p> <p>1 associate a question. The problem is we used the break</p> <p>2 for an actual bathroom break, so we didn't get a chance</p> <p>3 to chat.</p> <p>4 So, Mr. Cobb, is there anything -- so,</p> <p>5 obviously, I don't want to know, nor can I know -- you</p> <p>6 know this -- about any preparation that you had for</p> <p>7 this deposition. But what -- aside from that, what was</p> <p>8 your understanding -- or what is your understanding of</p> <p>9 your involvement in this matter, Donald J. Trump for</p> <p>10 President, Inc. versus Omarosa Manigault Newman?</p> <p>11 MR. STONEROCK: Calls for a legal conclusion,</p> <p>12 calls for speculation, lacks foundation, calls for</p> <p>13 attorney-client communications and attorney work</p> <p>14 product information.</p> <p>15 Mr. Cobb is a witness in the case. I'm not</p> <p>16 sure what you're getting at, John. Perhaps you</p> <p>17 could be a little bit more specific.</p> <p>18 MR. PHILLIPS: Certainly.</p> <p>19 BY MR. PHILLIPS:</p> <p>20 Q Well, let me back up this way. Do you -- do</p> <p>21 you expect -- if there's a trial of this matter, do you</p> <p>22 expect to testify?</p> <p>23 MR. STONEROCK: Same objections.</p> <p>24 You can answer if you -- if you have any</p> <p>25 expectation, Mr. Cobb.</p>
<p style="text-align: right;">Page 50</p> <p>1 attorney-client privileged communication and work</p> <p>2 product, attorney work product, information.</p> <p>3 To the extent, Alan, you've had any</p> <p>4 conversations with nonattorneys, you can answer it.</p> <p>5 THE WITNESS: I'm not recalling any of those</p> <p>6 conversations.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. Did you do any -- did you have any</p> <p>9 discussions with Omarosa Manigault Newman about this</p> <p>10 agreement other than: Hey, we need it signed. Here it</p> <p>11 is. Sign it?</p> <p>12 A Not that I'm recalling.</p> <p>13 Q Did you give any training to anyone at the</p> <p>14 campaign about this agreement?</p> <p>15 MR. STONEROCK: Objection, vague and ambiguous</p> <p>16 as to the term "training."</p> <p>17 You can answer.</p> <p>18 THE WITNESS: There was no training. Again,</p> <p>19 the words are pretty clear what it means.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. I'm gonna sever your -- your ability to</p> <p>22 control my laptop.</p> <p>23 A Okay.</p> <p>24 Q Nothing personal. We're just done with that.</p> <p>25 Bear with me one second and let my ask my</p>	<p style="text-align: right;">Page 52</p> <p>1 THE WITNESS: I have put zero thought into</p> <p>2 that.</p> <p>3 BY MR. PHILLIPS:</p> <p>4 Q Okay. And I guess you -- you were listed as a</p> <p>5 witness for the plaintiffs, and, you know, with that</p> <p>6 there was no indicated testimony. And what I'm trying</p> <p>7 to understand is, is there anything that -- that you --</p> <p>8 you believe you can contribute to defendant's</p> <p>9 understanding of why you were on a witness list as we</p> <p>10 sit here today?</p> <p>11 MR. STONEROCK: Objection, calls for a legal</p> <p>12 conclusion, calls for attorney-client</p> <p>13 communications, calls for attorney work product</p> <p>14 information, calls for speculation, lacks</p> <p>15 foundation.</p> <p>16 You can answer if you have an understanding,</p> <p>17 Mr. Cobb.</p> <p>18 THE WITNESS: Because I was the one who</p> <p>19 facilitated the signing of the NDA.</p> <p>20 BY MR. PHILLIPS:</p> <p>21 Q Okay. What do you mean by that?</p> <p>22 A Well, I think it means what it means. Just</p> <p>23 the email -- the -- the email correspondence you've</p> <p>24 already seen, and I was the one who sent it to her</p> <p>25 and was the one communicating with her that she needs</p>

Page 53

1 to get this signed.

2 Q Okay. Do you know if she was compensated at

3 all by the campaign prior to signing the agreement?

4 A I do not, no.

5 Q Bear with me. I'm wrapping up. So I'm just

6 trying to skip over some stuff so we can all go about

7 our days.

8 Let me go quickly scan one more email to

9 myself, and it will be my last five minutes.

10 A Okay.

11 Q I'll be right back.

12 MR. STONEROCK: We'll come back in, what,

13 three minutes, John?

14 MR. PHILLIPS: Sounds good.

15 MR. STONEROCK: Okay.

16 (Break from 11:34 a.m. to 11:38 a.m.)

17 BY MR. PHILLIPS:

18 Q Let me go through one more email, which, I

19 think, will be Defendant's 6.

20 MR. STONEROCK: I think it's 7, John --

21 MR. PHILLIPS: 7.

22 MR. STONEROCK: -- because the Lewandowski clip

23 will be 6.

24 MR. PHILLIPS: That's right. That's right.

25 (Respondent's Exhibits 6 and 7 were marked for

Page 54

1 identification.)

2 BY MR. PHILLIPS:

3 Q Can you see it?

4 A Yes.

5 Q And I'm -- I'm gonna go -- let's see. August

6 5, July 28. I'm gonna start at the bottom. And just

7 let me know if you need any context. Some of this

8 doesn't involve you, which is why I didn't have it

9 scanned in. But you -- you -- you have become involved

10 at some point. So --

11 A Sure.

12 Q -- there's an email which we'll attach as

13 Defendant's 7, on Monday, July 18, where it appears

14 Omarosa wrote, "Hi, Lucia, Lucia I am sending the info

15 you requested and I am cc'ing Alan Cobb on all email.

16 He is the contact for this, not Paul's office. Sorry

17 for any confusion.

18 "Also I understand about the urgency of the

19 NDA.

20 "Here is my address."

21 Again, on July 18 -- I guess, do you remember

22 this email? Do you have an independent recollection?

23 A I do not.

24 Q Does this refresh your recollection about any

25 of the material facts therein?

Page 55

1 MR. STONEROCK: Objection, lacks foundation,

2 vague as to material facts therein.

3 You can answer if you understand, Mr. Cobb.

4 THE WITNESS: That one particular email that's

5 on the screen doesn't refresh my memory in any way.

6 BY MR. PHILLIPS:

7 Q Okay. Then we move from July 18 to July 28.

8 Who was Jason Miller at the time? What was his

9 capacity?

10 A Some spokesperson of some kind officially on

11 the campaign.

12 Q Okay. And it appears Miller wrote --

13 Mr. Miller wrote Omarosa, "Want to talk about

14 formalizing your role."

15 And then it's a communication between Omarosa

16 and Jason Miller: Did you get my cell? Before I am

17 headed to the RNC event wanted to reach out. Didn't

18 want to miss your call. Can you talk now?

19 And then Mr. Miller responds back to Omarosa:

20 I'm about 15 minutes from being able to call.

21 Finishing with DJT -- finishing with DJT before he has

22 to leave.

23 And then we go to August 5 from Omarosa to

24 Paul Manafort: Morning, Paul, I had a productive

25 conversation with Jason last week. I am writing to see

Page 56

1 who will be processing my paperwork. I was originally

2 connected with Lucia to do my NDA and other paperwork

3 (see below email). Not sure who the new HR person is

4 now. Can you please let me know -- or can you -- can

5 you please let me connect -- can you please let me

6 connect me to the proper person. Omarosa.

7 I guess the -- the -- the reason that I bring

8 this is there is some interplay apparently before the

9 campaign involving Paul Manafort. Do you have an -- do

10 you have any knowledge of whether Ms. Manigault Newman

11 had a conversation with Mr. Manafort about her

12 involvement with the campaign before the RNC?

13 MR. STONEROCK: Objection, calls for

14 speculation, lacks foundation.

15 You can answer if you know, Mr. Cobb.

16 THE WITNESS: I'm not aware of any such

17 conversation.

18 BY MR. PHILLIPS:

19 Q Okay. Do you know whether it did or it didn't

20 happen?

21 A I do not.

22 Q Who maintains -- did you maintain your email

23 from your time at the campaign?

24 MR. STONEROCK: Objection, vague as to time,

25 and also vague and ambiguous as to maintain.

Page 57

1 You can answer, Mr. Cobb, if you know.
 2 THE WITNESS: I did not.
 3 BY MR. PHILLIPS:
 4 Q Okay. Do you know if the campaign has the
 5 emails you sent and received while employed by the
 6 campaign or contracted by the campaign?
 7 MR. STONEROCK: Calls for speculation, lacks
 8 foundation.
 9 You can answer, Mr. Cobb.
 10 THE WITNESS: I do not know.
 11 MR. PHILLIPS: That's all I have. Thank you
 12 for your time today.
 13 THE WITNESS: Thank you.
 14 MR. STONEROCK: John?
 15 MR. PHILLIPS: Yeah.
 16 MR. STONEROCK: Could we go off the record for
 17 a minute?
 18 MR. PHILLIPS: Sure.
 19 MR. STONEROCK: And, Beth, we are going to
 20 order a copy of the transcript and, also, a copy of
 21 the video.
 22 (Off-the-record discussion.)
 23 (Witness excused.)
 24 (The deposition was concluded at 11:44 a.m.)
 25 - - -

Page 58

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 3 COUNTY OF DUVAL)
 4
 5 I, ELIZABETH M. MASTERS, hereby certify that the
 6 witness named herein appeared remotely before me on March
 7 9, 2021, produced a Kansas Driver's License as
 8 identification, and was duly sworn.
 9 DATED this 28th day of March 2021.
 10
 11
 12 /s/ Elizabeth M. Masters
 ELIZABETH M. Masters, RPR
 13 Notary Public - State of Florida
 My Commission No. GG 987462
 14 Expires: June 4, 2024
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 59

1 C E R T I F I C A T E
 2 STATE OF FLORIDA)
 3 COUNTY OF DUVAL)
 4 I, ELIZABETH M. MASTERS, RPR, Notary Public,
 5 State of Florida at Large, certify that I was authorized to
 6 and did remotely stenographically report the video-recorded
 7 deposition of ALAN COBB; that a review of the transcript
 8 was requested; and that the transcript is a true and
 9 complete record of my stenographic notes.
 10 I further certify that I am not a relative,
 11 employee, attorney or counsel of any of the parties, nor am
 12 I a relative or employee of any of the parties' attorney or
 13 counsel connected with the action, nor am I financially
 14 interested in the action.
 15 Dated this 28th day of March 2021.
 16
 17
 18 /s/ Elizabeth M. Masters
 19 ELIZABETH M. MASTERS, RPR
 20
 21
 22
 23
 24
 25

Page 60

1 E R R A T A S H E E T
 2 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES BELOW
 3 IN RE: DONALD J. TRUMP FOR PRESIDENT, INC. v. OMAROSA
 4 MANIGAULT NEWMAN
 5 PAGE LINE CHANGE REASON
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 "Under penalties of perjury, I declare that I
 22 have read the foregoing document and that the facts stated
 23 in it are true."
 24 _____
 25 DATE ALAN COBB

1 RILEY REPORTING & ASSOCIATES
2 1301 Riverplace Boulevard, Suite 610
3 Jacksonville, Florida 32207
4 (904) 358-1615
5 info@rileyreporting.com

6 March 28, 2021
7 RYAN STONEROCK, ESQUIRE
8 Harder LLP
9 260 Madison Avenue, Sixteenth Floor
10 New York, New York 10016

11 RE: Donald J. Trump for President, Inc. vs. Omarosa
12 Manigault Newman
13 Deposition of: Alan Cobb

14 Dear Mr. Stonerock:

15 This letter is to notify you that the transcript of Mr.
16 Cobb's deposition that was taken on March 9, 2021 is now
17 ready for his review.

18 Please have Mr. Cobb read your copy of his deposition
19 transcript that was emailed to you. Upon execution of the
20 attached Errata Sheet, if you would please provide a copy
21 to Mr. Phillips.

22 Thank you for your assistance.

23 Sincerely,

24 /s/ Elizabeth M. Masters

25 Elizabeth M. Masters, RPR

cc: John M. Phillips, Esquire
jmp@floridajustice.com
erica@floridajustice.com

1	5	33:10,12	appointed 8:20	based 25:9
1 7:21 8:2 18:19,20 47:12,13	5 27:20,21 54:6 55:23	advice 10:22	April 26:13	basically 7:9
11:16 47:4	5L1-C4 11:20	advise 25:17	arbitration 34:23,25	basis 23:16
11:24 47:4	6	affiliated 14:13 23:8	arbitrator 9:15	bathroom 51:2
11:34 53:16	6	African 29:1	article 34:20	battleground 28:23
11:38 53:16	6 53:19,23,25	African-american 14:22 27:8 28:17,24 29:2	articulate 42:10	bear 31:16 50:25 53:5
11:44 57:24	7	aggressive 21:8	ASAP 17:6	beginning 28:6
15 55:20	7	agree 4:8	aspect 29:4	behalf 4:7 32:4 38:21
150 10:8	7 53:20,21,25 54:13	agreement 4:2 8:25 9:3 19:7 31:24 32:9, 22 33:3,5 35:3 36:8, 25 37:6 39:9,24 43:1,12,23 44:7,18, 19 45:19,23,25 47:11,19 48:20 49:24 50:10,14 53:3	assessment 32:14	Berkowitz 28:2
16 7:15 13:6	8	agreement's 36:25	asset 22:24	Beth 57:19
18 54:13,21 55:7	8 17:4,14 23:13	agreements 9:19 30:17,20 31:21 32:1 33:11 34:6,7 35:7, 15,16	associate 51:1	big 5:20 6:8
1992 10:18	9	ahead 15:16 36:25	assume 5:6 6:12	Billy 44:12
1996 11:18	99 11:18	Alan 4:9,24 5:4 8:13 9:7,22 11:16 12:13, 24 13:20 15:6,16 16:9 19:21 22:21 24:11 44:3 45:3,15 46:9,16 48:1 49:1,8, 17 50:3 54:15	assumed 11:21	bit 10:10 51:17
2	A	allowing 47:6	Assuming 37:13	board 22:18
2 18:22,24 47:13 48:8 49:10	a.m. 47:4 53:16 57:24	ambiguous 38:10 39:20 44:1 50:15 56:25	attach 27:19 54:12	bolts 28:25
2004 11:24	ability 50:21	Americans 11:19, 20	attached 30:12	book 32:12,13,14, 18,20 34:19 36:3 40:20
2012 11:24	aboard 14:4 15:14	Analytica 28:12	attempting 37:23	bottom 24:5 54:6
2013 11:24	absolutely 6:11	announcement 24:15 42:2	attorney 12:23 18:6 32:23 36:12 39:1 40:7 50:2 51:13 52:13	bound 37:23
2014 11:25	Access 44:11	anticipate 5:19	attorney-client 18:6 36:11 39:1 47:21,22 50:1 51:13 52:12	Brad 28:3
2015 7:21 8:2 32:8	accommodating 4:21	AP 31:19 33:25	attorneys 32:17	breach 35:2 43:1,11
2016 14:2 17:4 23:4 26:25	accomplished 19:18	appearance 27:7,8	audience 48:19	break 6:7,19 46:24 47:4 48:14 51:1,2 53:16
24 19:6 22:9 23:4	accountable 33:5	appears 19:6,9 20:18,22 24:20 25:5 28:15,16 54:13 55:12	August 15:22 17:4, 14 19:6 22:9 23:4,13 54:5 55:23	bring 15:23 16:3 21:11,12 22:17,25 33:18 56:7
25th 24:24	acobb@ donaldtrump.com 17:11 19:6 24:3		Avrahm 28:2	bringing 14:4
26 24:2	acquired 12:9		aware 13:5 14:1 18:2 56:16	broken 35:7
28 54:6 55:7	acting 21:13		B	brothers 11:13
3	actual 51:2		bachelor's 10:13	brought 13:24 14:3 15:14 26:13 33:12, 20
3 20:19 21:2	adapted 12:9		back 7:16 20:8,13 23:11 25:13,16 28:17 45:3 46:20,22 51:20 53:11,12 55:19	budget 21:24
30th 7:11	address 17:12 54:20		background 10:11	Bush 44:12
4	administration 7:18 8:10 10:14 32:2		bad 32:15 38:3 39:6, 7,8,15	business 12:9 33:9, 18 34:8,10
4 24:2,6,7,8				C
45-minute 42:14				C3 11:21

call 55:18,20	chance 51:2	commonly 43:23	8:7,8	dates 25:3
called 14:25	changed 26:17	communicating 52:25	contracted 7:22 8:2 57:6	day 6:9 7:10 8:10, 14,15 25:6,13 27:12
calls 12:12,22 13:16 15:3 17:17 18:5,6 19:19 22:19 31:8 36:9,10,11,21 37:25 38:8,9,25 39:10,19 40:6,7,8 41:3 43:3, 13,25 44:21 45:13, 20 47:20,21 48:24 49:15,25 51:11,12 52:11,12,13,14 56:13 57:7	chase 26:14	communication 18:6 50:1 55:15	contractually 32:5	Day-ish 27:11
Cambridge 28:12	chosen 34:15	communications 36:12 39:1 47:22 51:13 52:13	contribute 52:8	days 31:20 53:7
cambridgeanalytic a.org 28:11	church 27:8	communities 28:24	control 46:13,16 47:6 50:22	dealing 19:23
campaign 7:18,20 8:4,6,9,15 9:4 13:3, 6,10,14 14:14 15:20 17:8 18:10 19:24 22:24 23:4,9,15,17 25:1,24 27:1 28:24 29:4,8,24 30:2,18,22 31:5,15,21 32:3,8, 10,11,15 35:16 38:22 40:2,4 41:17 42:7 47:15,17 48:17 50:14 53:3 55:11 56:9,12,23 57:4,6	cited 35:24	community 29:2	controlling 46:21	dealt 21:25
campaigns 20:4 26:18	City 25:7 26:3	company 34:8,9	convention 14:15 19:25 22:16 26:14	decided 22:23
capacity 13:3 14:20,21 15:24 21:11 33:15 55:9	claimant 4:8	compensated 13:14 53:2	conversation 5:14, 16,18 35:12 44:19 55:25 56:11,17	decision 15:23 22:17
case 37:2 42:9,11 43:4,15 51:15	clarification 6:19	competitor 34:11	conversations 21:10,22 30:16 35:14,18 45:9 47:16 48:1,5,12 49:22 50:4,6	defendant's 18:19, 22 20:10,19 24:2,7 27:20 52:8 53:19 54:13
cases 32:6 44:8	classified 33:1	complete 17:6	copy 57:20	defined 47:17
Castellano 19:14	classify 40:21	completely 35:7	Corey 8:5 18:10 26:15,21,25 30:16, 25 31:13,19 35:14, 18 37:15 42:2	definition 47:24 49:4
cc'ing 54:15	clause 34:1	compound 8:12 17:17 37:25	correct 5:7 17:13 19:8,9,15 20:25 21:1 27:3	degree 10:15
cell 55:16	clear 5:24 6:5 32:24 39:14 45:16 50:19	computer 47:10	corrections 38:19	delay 4:16
Central 4:17	client 29:23,24 30:7	con- 21:21	correspondence 52:23	delayed 25:17
CEO 7:3	clip 31:13 35:21 42:15 53:22	concerns 21:16,25 29:5	counsel 4:1	delegate 26:14
cetera 13:12 22:2 40:23 41:19	close 38:23	concluded 57:24	couple 22:4 23:25	deposition 5:10,20 18:19,23 51:7 57:24
chain 24:4,5 25:19, 21	closing 10:7	conclusion 31:9 36:11,22 38:1,9 39:10,19 40:6 41:3 43:3,14 44:22 45:14, 21 47:21 48:24 49:15 51:11 52:12	court 4:1 19:1 34:24	determine 14:23 48:20
chair 26:17	Club 42:20	conferring 26:1	credibility 32:3	Detroit 27:9
chamber 7:4 12:1 41:19	clunky 49:5	confidential 38:16, 24 42:7 47:13,18,25 48:2 49:6	crime 33:1	difficult 29:16
	coalition 16:1 25:23	confusion 54:17	critical 32:6 34:2	digitally 19:2
	coalitions 14:21	connect 56:5,6	crucial 6:11	DIRECT 4:13
	coaster 4:19	connected 56:2		direction 18:9 25:24
	Cobb 4:9,24,25 5:4 16:9 18:8 24:11 29:22 36:14 39:13, 21 41:6 43:16 44:25 46:16 47:7 51:4,15, 25 52:17 54:15 55:3 56:15 57:1,9	connection 45:6	D	directive 18:3
	coffee 6:24	consideration 32:21	damaged 40:4	director 19:15 25:23
	Cohen 12:3,4,6	considered 40:13	damaging 40:13	disclosing 32:25
	coincides 25:4	contact 26:4 54:16	data 28:4,13	disclosure 49:3
	collecting 19:17	contacted 32:16	date 24:14 25:2 26:16 35:20	discussed 47:17
	comfortable 6:25	context 54:7	dated 19:6 24:2	discussion 57:22
	comment 29:9	contract 7:7,12,20		discussions 31:4 50:9
	comments 40:12			dishonesty 15:17 29:10
	Commerce 7:4 12:1			disparage 49:20

disparagement 47:13 49:6,7	employment 34:14, 16	extent 28:14 50:3	friends 48:18	headed 55:17
disregarded 35:8	enable 46:2	<hr/>	front 37:1 40:19 45:24	headquarters 11:18
distinguish 48:16	end 7:13 28:10 30:6 35:10	F	frozen 45:1	hear 30:20
distracting 10:8	enforce 36:7 38:20 44:2	facilitated 52:19	full 4:22	heard 12:14
DJT 24:16 55:21	enforceable 33:6, 16,24 34:5 37:17	fact 14:17	funders 11:23	Hey 50:10
DNC 25:9	enforced 44:7	facts 5:23 54:25 55:2	<hr/>	hierarchy 25:24
document 16:10 30:5,8 47:23,25 49:16	enforcement 35:9 43:19,20	fair 5:12 6:14,15 12:18 13:4	G	Hilger 27:25 28:7
documents 16:4	enforces 43:23	familiar 5:1 38:16	Gates 14:25 26:6	hired 14:16 22:6
Donald 5:5 7:5 13:13,25 23:20 27:2, 7 38:5 40:22,23 41:22,25 42:23 43:22 44:11,13 51:9	engaged 30:24	family 7:17 40:23	Gates's 26:7	hold 33:4
drafted 12:20	engagement 23:10 28:25	fast 49:13	gave 41:10	Hollywood 44:11
due 9:21	entities 12:10	federal 8:17,21	general 10:13	home 45:8
duly 4:10	essentially 8:4 31:6	feel 42:25	Generally 38:17	honest 32:14,19 34:5
durn 49:12	euphamism 23:23	figure 20:13 29:1 37:16	give 5:12 10:10 24:14 46:15 47:8 50:13	honestly 5:11
<hr/>	event 55:17	file 17:7 23:13,14	giving 43:8,10	honesty 29:5
E	exact 7:11	final 8:8,10	good 4:15,16 22:1 32:15 53:14	hour 47:2
<hr/>	EXAMINATION 4:13	finally 6:7	gosh 11:24 49:12	House 31:22
earlier 4:20	Excuse 44:16	find 34:25 42:18	Gotcha 16:2	HR 19:15 20:5 56:3
early 14:1 22:11 26:24	excused 57:23	finger 6:5	government 8:18, 22 10:13 32:23 33:4, 15,19,23 36:4	huh-uhs 5:25
Eastern 4:17	executive 33:18	finishing 55:21	Grab 44:15	hypothetical 38:8 39:11,19 40:9 41:4 43:4,14 44:2,22 45:14,21
economy 41:19	exhibit 18:15,19,20, 22,24 20:10 21:2 24:6,7,8 27:21 30:13	firm 28:13	great 46:18 47:3	<hr/>
edits 10:24,25	Exhibits 53:25	focus 29:16	ground 5:13	I
educational 10:11	exist 32:11	folks 15:22 19:22,24 21:25 22:23 23:18 30:23	guess 8:8,21 10:21 13:2 14:9,11 15:11 21:16 23:11 25:13 28:18,21 29:10,25 37:17 38:19 43:17 52:4 54:21 56:7	idea 13:21 33:7 44:4
election 7:10	expand 16:20 20:16	formalizing 55:14	guessing 5:22	identification 18:21,25 21:3 24:9 27:22 54:1
email 10:5 16:9,17 17:4,10,12 19:5 23:12,13 24:2,18,21 25:6,10,18,21 26:2 27:16 28:6,16,19 29:15,23,25 52:23 53:8,18 54:12,15,22 55:4 56:3,22	expect 40:3 51:21, 22	forum 45:10	<hr/>	identified 28:7
emails 10:6,8 28:10 57:5	expectation 51:25	forwarded 17:3 20:23	H	identify 29:8
employed 7:2,3,5 31:5 57:5	experience 33:19 36:6	found 29:9	hand 48:15	ignore 17:2
employee 33:4	experiment 16:3	foundation 11:21 12:11 13:17 15:4 17:18 19:20 22:20 30:4 31:8 36:10 38:9 39:11,20 41:4 44:1, 23 51:12 52:15 55:1 56:14 57:8	hang 10:5 42:5 47:8	impeach 34:3
employees 32:23	expert 40:8	frankly 21:8 22:3 42:8	happen 56:20	implement 33:22
	Explain 21:15,21	free 34:17	happening 34:21	impropriety 29:10
	exposed 15:17	Freedom 11:25	happy 30:11	incident 44:11
	expressed 22:1		head 30:25	include 38:5
				incomplete 38:7 39:11,18 40:8 41:4 43:3,14 44:2,22 45:14,21

inconsistency 15:13		laptop 50:22	Manafort 14:16,20 15:14 22:6 26:12,13 29:9 55:24 56:9,11	Monday 54:13
independent 11:23 54:22		late 26:24		monetary 34:25
indifferent 32:15	J	Laura 27:25 28:6	Manafort's 26:10, 16	month 7:12
individual 34:15	January 32:8	law 9:12 10:14,15	manage 26:14	months 30:1
individually 38:21	Jason 55:8,16,25	lawyer 10:16	manager 8:4 18:10 27:1	morning 4:15,16 55:24
individuals 35:6	John 4:4,25 11:2 16:12,20 18:14 24:6 27:14 29:14 30:5,21 35:20 37:3 42:6 46:5,24 47:24 51:16 53:13,20 57:14	lawyers 9:13 36:4	Manigault 4:5 5:1 9:1 14:12 17:5 20:23 22:17 28:19,20 29:5, 10 36:24 37:6,19 40:4 50:9 51:10 56:10	motion 35:22
Industries 11:14,17	joined 32:7	layman's 5:18	marathon 6:9	mouse 46:18
info 54:14	joking 41:21	lead 15:19	March 7:20 8:2	Mouse/keyboard 46:16
information 33:1 34:9 38:16,24 39:2 40:8 47:13,18,23,25 48:3 50:2 51:14 52:14	judge 9:16	learned 16:5 31:19	mark 18:14,18	move 9:14 55:7
inquire 25:7 26:3	judges 6:4	leave 34:14 55:22	marked 18:20,24 21:2 24:8 27:21 53:25	multiple 35:5
inquired 25:6 26:2	July 14:1 15:22 22:11 24:2,24 26:25 54:6,13,21 55:7	leaving 41:16	master's 10:13	named 25:23
instruct 42:13	July-august 13:6	legal 10:21 31:9 32:10 36:11,21 38:1, 9 39:10,19 40:6 41:3 43:3,13 44:21 45:13, 20 47:20 48:24 49:15 51:11 52:11	material 54:25 55:2	national 40:12 48:18
instructed 9:11	June 26:15,21,24	Lewandowski 8:5 18:10 26:12 27:1 30:17 31:14 32:7 34:4 35:14 36:2 37:15 53:22	matter 41:1 51:9,21	NDA 10:22,25 11:3 12:7,20 18:4 24:13 30:11,25 31:2,6 36:7 52:19 54:19 56:2
integrity 29:6	K	licensed 10:16,17	meaning 48:2	NDAS 17:15,16,21, 25 19:17 31:14
interactions 22:5	Kansas 7:4 10:19, 20 41:19	list 52:9	means 50:19 52:22	necessarily 23:8 42:15
internal 21:9,21,22	kicked 13:3	listed 52:4	meant 49:23	needed 8:5
Internet 45:6	kind 5:13,18 19:16 21:8 23:22 26:9,17 28:22 29:19 37:16 45:10 55:10	long-term 33:9	mechanism 35:9	needed 8:5
interplay 56:8	knew 14:25 22:4	lot 23:24,25 26:18 29:22 30:3 31:19 41:10	media 23:19	negative 40:21 41:1 42:22 43:10
interpretations 23:25	knowledge 28:14 56:10	lots 11:23 23:6 40:19,20	meetings 25:17	network 11:22
interrupt 27:15	Koch 11:13,17,22 12:9	Lucia 19:13 25:15 54:14 56:2	memory 55:5	Newman 4:5 5:1 9:1 14:13 20:24 22:18 27:4 28:20 29:11 37:7,19 40:5 50:9 51:10 56:10
introduction 14:10	L	M	mention 23:5	Newman's 29:5 36:25
involve 30:10 54:8	labeled 20:10	Madam 19:1	message 20:20	nice 21:12
involved 14:4 19:18 29:20 30:1 38:18,19 44:8 49:22 54:9	Labor 27:11	made 14:25 15:23 44:12	met 14:7 22:8,10,13, 14	no-no 5:20
involvement 19:23 51:9 56:12	lacks 12:11 13:16 15:4 17:18 19:20 22:20 30:4 31:8 36:10 38:8 39:11,20 41:4 44:1,22 51:12 52:14 55:1 56:14 57:7	maintain 56:22,25	Michael 12:3,4,6	nonappointed 8:21
involving 28:18 29:24 48:15 56:9	language 31:6,7 44:16 48:8	maintains 56:22	mid-june 26:23	nonattorneys 50:4
irrelevant 43:4,15		make 9:13	Miller 55:8,12,13,16, 19	noncompete 34:7
issue 29:8 33:8 34:24		making 19:17	mine 18:13	nondisclosure 30:17,20 31:6,20,24 32:1,9,22 33:3,5,11 34:6 35:2,6,15
issues 21:24,25 26:5 42:8		man 26:10	minute 57:17	
			minutes 31:17 46:25 53:9,13 55:20	
			misstates 15:5 21:18 43:2 48:23	

nondisparage 35:16 36:7 37:5,22 38:24 48:8	Options 46:10	Phillips 4:4,14,25 8:1,19 9:9,25 11:4,7 12:2,15 13:1,18,22 15:9,18 16:5,8,13, 16,22,24 17:1,20 18:1,11,16,18 19:4 20:1 21:4,20 23:2 24:7,10 27:17,19,23 29:18,21 30:10,15, 22 31:1,12 35:11,22 36:1,17 37:4,12 38:4,14 39:5,16,25 40:14,25 41:8,12,14, 15 42:14,17 43:5,19, 21 44:5 45:11,18 46:1,7,15,19 47:1,5 48:6,13 49:21 50:7, 20 51:18,19 52:3,20 53:14,17,21,24 54:2 55:6 56:18 57:3,11, 15,18	41:18 48:15 51:10	purposes 5:13 26:20
nondisparagement 34:1 36:20,24	order 57:20		president's 32:4	
nonlawyers 48:2	organization 33:10		presidential 29:2	
normal 5:14,16 28:24	organizations 20:6 31:22		presume 30:6	
November 7:11,13, 15	original 35:24		pretty 39:14 50:19	
number 31:24,25	originally 56:1		previous 23:20	
nuts 28:24	outrageous 40:11		primary 19:25	
	outreach 14:22 28:18,25		prior 14:6 23:10,12 53:3	
O	owner 34:10		private 11:20 33:21	
			privileged 36:12 39:2 40:7 50:1	
	P		problem 4:17,18 51:1	
oath 4:11	Pachyderm 42:19		processing 56:1	
object 49:14	paper 24:12,14		produced 4:10 29:23 30:6,8	
objection 8:12 9:6, 21 12:11,22 15:3 17:17 18:5 19:19 21:18 36:9,21 37:8, 25 38:7,25 39:18 41:11 42:4 43:2,13, 25 44:21 45:13,20 47:20 48:10,23 49:25 50:15 52:11 55:1 56:13,24	paperwork 20:20 24:25 25:14 56:1,2	Plaintiff's 27:19	product 12:23 18:7 36:13 39:2 40:7 47:22 50:2 51:14 52:13	
objections 9:10,14 15:15 17:23 40:17 51:23	paragraph 49:10	plaintiffs 52:5	productive 55:24	
off-the-record 57:22	Parscale 28:3	play 31:13	professionally 21:14	
office 54:16	part 11:22 17:2 47:16	player 22:2	prohibited 32:5 34:1	
official 21:11 23:10 24:14	parties 8:9	players 29:20	project 28:21	
officially 5:16 55:10	Partners 11:25	playing 31:18 35:10	projects 27:4	
Omarosa 4:4 5:1,2 9:1 10:2 12:8 13:3, 24 14:12 15:13 17:5 19:5 20:3 22:1 24:3, 11,17,19,25 25:13, 22 28:19 30:1 31:2 37:6,19 40:4 50:9 51:10 54:14 55:13, 15,19,23 56:6	past 35:5	plenty 45:7	proper 56:6	
Omarosa's 11:2 20:2	patient 20:21 21:6	podcast 13:12	proposal 32:20	
open 20:14	Paul 14:16 15:14 26:10 29:9 55:24 56:9	point 8:24 12:7 22:8 26:11 54:10	proprietary 34:9	
opinion 41:5,7	Paul's 54:16	political 31:22	Prosperity 11:19,20	
	pen 34:20	popping 10:6	protected 47:18	
	penalty 34:25	positions 8:21	provide 10:21,24 19:1	
	Pennsylvania 10:14	post 19:25	provision 36:20,24 49:7	
	people 6:3 23:7 32:2,4 34:18 39:9	potentially 7:11	provisions 37:22	
	period 39:15	practical 26:20	public 33:4 45:10 49:3	
	person 5:8 23:1 35:1 56:3,6	practice 31:25 33:9	publicly 49:20,23	
	personal 14:10 50:24	preclude 34:10	publish 34:19	
	personally 38:19	precursor 32:10	pull 35:23	
	Philips 4:4	preparation 51:6		
		presence 22:15		
		present 20:9		
		presented 37:19		
		president 5:5 7:3,6 13:14,25 27:2 31:24 32:6 33:18 34:2 38:6		
			question 15:8 38:2, 11 39:12 41:20 42:6 43:7 44:24 47:14 48:7,25 51:1	
			questions 6:13 27:24 29:15 31:16	
			quickly 53:8	
			R	
			race 29:3	
			radio 13:12 23:8	
			ran 14:19	
			reach 55:17	
			ready 25:9	
			reason 5:25 6:8 37:10 56:7	
			reasons 32:10	
			recall 7:11 14:7,11 17:4,24 24:21 25:10, 11 26:6 28:21 41:21, 24 42:18,19,22 43:9	
			recalled 43:8	
			recalling 15:21 19:12 21:10 22:22 23:18 27:6 28:3 30:23 35:17 39:4 40:22 48:4,9,11 50:5,12	
			received 19:11 57:5	
			recollection 14:12 29:19 35:13 54:22, 24	
			record 4:2,23 5:25 19:3 57:16	
			recording 44:12	
			recourse 34:22	
			recruiting 14:4	

referenced 39:9	Rick 14:25 26:6,7	sic 22:7	55:10	successfully 35:4
refresh 29:19 54:24 55:5	right-hand 26:10	sign 6:2 9:3,18 33:13 34:16 37:19 50:11	stage 21:13	sugar 21:7
refreshes 35:13	RNC 14:19 22:11,16 25:3 55:17 56:12	signed 9:1 10:2 12:8 17:25 19:7 31:2,23 32:9 33:13, 25 35:6 36:20 37:7, 20 43:1 44:19 50:10 53:1	star 44:14	supervisor 20:2,4
regard 49:23	road 9:16	significance 15:11	start 24:12 25:14 46:23 54:6	supporters 23:7
related 10:22 30:17, 20 35:12,16	role 14:7 19:16 26:7 55:14	significant 15:2,5	started 6:20 7:20 13:8 34:16 46:8	suppose 13:11
relates 32:22	ruled 9:15	signing 52:19 53:3	state 4:1,22 10:12, 19	surrogate 13:9 17:7 23:3,15,17,23
relationship 11:13 23:21	rules 5:13 34:15	signs 30:25	statement 13:4 24:15,16	surrogates 13:13 17:15,16,21,25
relevance 9:6,21 25:2 36:9 37:1 42:6 43:18,20	Ryan 4:7 45:2	similar 9:3	states 28:23 30:24 38:6 48:16	swear 4:3,6
relevant 23:6 42:10	<hr/> S <hr/>	signing 52:19 53:3	statistics 28:18	sworn 4:10 5:15,21
remember 25:3,18, 20 26:15,23,24 28:1 54:21	scan 53:8	signs 30:25	stayed 15:21	<hr/> T <hr/>
Remote 46:13 47:8	scanned 54:9	simultaneous 28:19	steal 34:8	talk 34:18 41:19 44:20 48:17 55:13, 18
remotely 4:3,6	school 9:12 10:15	single 23:1	stipulate 4:5	talking 22:5 23:19 31:14 37:15
repeat 15:7 43:7	scigroup.cc. 28:7, 12	sit 12:19 40:1 52:10	Stonerock 4:7 7:24 8:12 9:6,21 11:2,5, 15 12:11,22 13:16, 20 15:3,15 16:5,7, 12,20,23,25 17:17, 23 18:5,14,17 19:19 21:18 22:19 24:6 27:14,18 29:14 30:4, 14,19 31:8 35:20 36:9,21 37:8,25 38:7,25 39:10,18 40:6,17 41:3,11,13 42:4 43:2,13,25 44:21 45:3,13,20 46:5,9,12,17,24 47:3,20 48:10,23 49:7,10,14,25 50:15 51:11,23 52:11 53:12,15,20,22 55:1 56:13,24 57:7,14,16, 19	talks 36:2 49:3
reported 11:22	screen 16:10 27:16 46:10,21 55:5	six-page 28:16	stop 20:7 34:12,21 46:23	team 8:16 22:1 32:17 36:5
Reporter 4:1 19:2 31:19 33:25	scroll 46:2,3 47:10 49:8	skip 53:6	strength 45:8	technically 7:7 8:14,16
reporting 20:5	scrolling 29:17 49:4,13	sought 47:18	structure 25:25	television 13:11 23:7
represent 5:1	sector 33:21,23	sound 20:24	studies 10:13	tend 21:7
represents 13:10	seeking 38:20	sounds 21:1 53:14	stuff 26:15 38:3 39:7,8,15 53:6	term 15:4 38:15 50:16
reprimands 38:20	segment 25:16	source 26:4	subject 10:22,25 12:7,20 20:19,20 24:11 25:20 47:19	terms 38:21
Republican 14:15	selective 43:19,20	speak 25:15 49:19	submit 32:19	testified 4:11
request 16:9 46:12	selectively 43:23 44:2	speaking 42:18,19		testify 48:3 49:18 51:22
requested 54:15	selectively 43:23 44:2	speaks 47:23 49:16		testimony 15:5 21:19 40:8 43:3 48:24 52:6
responded 4:11	send 19:12 30:13	specific 24:21 51:17		thing 16:1 23:5
respondent's 18:20,24 21:2 24:8 27:21 53:25	sending 54:14	specifically 25:21 41:18		things 6:4 25:25 32:18,20 33:20 40:22 41:1
responds 55:19	serve 32:2,4	speculating 5:22		thinking 25:8
response 25:5	served 8:15	speculation 12:12, 17 13:16 15:4 17:18 19:20 22:20 30:4 36:10 38:8 44:1 51:12 52:14 56:14 57:7		thought 17:6 23:13, 14 52:1
responsible 35:1	set 21:13	speech 34:17 41:21 42:2,23 43:9		three-minute 31:13
retained 14:20 15:14,20	sever 50:21	speeches 41:9,13, 16,23 42:1		time 4:17,18 5:9
review 32:21 48:20	shake 6:4	spokesperson		
reviewed 8:25	share 20:7 46:23			
revisions 10:25	short-circuit 5:17			
	shortly 19:2			
	showing 45:7			
	shows 13:11 40:12			

7:25 11:15 13:17 15:12 17:12 22:10, 13,19 26:8 28:20 32:11,14 41:17 55:8 56:23,24 57:12	TV 40:12	valid 31:7 32:24	27:4 33:14 36:12 39:1 40:7 47:22 50:1,2 51:13 52:13
timing 25:8	typically 13:11	vastly 45:9	worked 5:5 11:17, 25 27:6 28:3 48:17
title 26:9,16,17	<hr/> U <hr/>	version 20:22	working 8:11,17 11:12 13:3 47:9
titles 26:18	uh-huh 6:3	versus 4:17 51:10	worry 6:23
today 5:13 12:19 40:1 52:10 57:12	uh-huhs 5:25	video 6:2 19:3 45:4 57:21	worth 22:2
told 14:16 22:6	Undergraduate 10:12	video-recording 31:18 35:10	wrapping 53:5
tomorrow 25:7	undermine 32:3	view 42:8 46:10	write 32:17 41:22,25
top 17:2 46:10	understand 6:9,11 8:13 9:17 14:18 17:19 22:21 29:20 37:18 38:2,11 39:12, 21 40:10 43:16 44:3, 24 45:15,22 48:25 49:1 52:7 54:18 55:3	vinegar 21:8	writing 55:25
topic 48:15	Understandable 6:17	violated 36:16,19	wrote 32:12 36:3 54:14 55:12,13
totally 43:14	understanding 13:23 14:12 17:15 23:16 36:19 37:14, 20,21 43:18 44:17 47:15 49:17 51:8 52:9,16	violating 38:24	<hr/> Y <hr/>
touch 15:21	Understood 30:14	violation 39:23	y'all 4:20
tour 40:20	United 38:6 48:16	virtually 17:24	York 25:7 26:3
Traditionally 34:6	universal 6:2	voter 28:4	<hr/> Z <hr/>
traffic 29:25	University 10:12, 14,15	<hr/> W <hr/>	Zoom 20:13 46:22
trail 32:15	unlike 5:16	wait 44:13	
training 50:13,16,18	unread 10:8	walking 44:12	
transcript 40:16,18 57:20	unsigned 20:22	wanted 55:17	
transition 8:16 26:11	unstable 45:7	wanting 33:18,22	
trees 20:5	untrue 14:24	Washburn 10:15	
trial 51:21	untruthful 39:8	water 6:23	
trouble 22:3	update 25:14	week 25:8 55:25	
true 14:17 43:22	urgency 54:18	weekend 27:12	
Trump 5:5 7:5,17 8:9,11 13:13,25 23:7,20 27:2 31:21 32:16,17 33:9,10 35:16 36:4,5 38:5 40:22,24 41:17,22 42:23 43:22 44:13 51:9	<hr/> V <hr/>	weeks 31:20	
Trump's 7:17,18 27:7 41:25 44:11	vague 7:24 11:15 13:17 15:4 22:19 38:10 39:19,20 41:11 44:1 50:15 55:2 56:24,25	west 4:19	
truth 5:15,22 15:1	vaguely 28:22	whatsoever 12:17 15:1 32:25 33:6	
truthful 41:2		White 31:22	
turn 10:5		Wi-fi 45:8	
turnout 28:25		Wichita 10:12 11:18 42:19	
turns 5:17		window 16:21	
		windows 20:14	
		wondering 46:2	
		word 27:8 45:24	
		words 50:19	
		work 7:17 12:23 13:5 14:14 17:7 18:7 23:3,15,17 24:12,14	