

<p style="text-align: right;">Page 1</p> <p>1 AMERICAN ARBITRATION ASSOCIATION NEW YORK, NEW YORK</p> <p>2</p> <p>3</p> <p>4 DONALD J. TRUMP FOR PRESIDENT, INC., a Virginia not-for-profit corporation,</p> <p>5</p> <p style="padding-left: 40px;">Claimant,</p> <p>6</p> <p>vs.</p> <p>7</p> <p>8 OMAROSA MANIGAULT NEWMAN, an individual,</p> <p>9</p> <p style="padding-left: 40px;">Respondent.</p> <hr/> <p>10</p> <p>11</p> <p>12 VIDEO-RECORDED DEPOSITION OF SEAN RAY DOLLMAN Taken on Behalf of the Respondent</p> <p>13</p> <p>14</p> <p>15 DATE TAKEN: Wednesday, March 31, 2021 TIME: 10:02 a.m. - 3:30 p.m. PLACE: By Videoconference</p> <p>16</p> <p>17</p> <p>18</p> <p>19 Examination of the witness taken remotely before:</p> <p>20</p> <p style="padding-left: 40px;">Elizabeth M. Masters Registered Professional Reporter</p> <p>21</p> <hr/> <p>22</p> <p>23 RILEY REPORTING & ASSOCIATES 1300 Riverplace Boulevard, Suite 610 Jacksonville, Florida 32207 (904) 358-1615 info@rileyreporting.com</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <p>1</p> <p>2 Video-recorded deposition of Sean Ray Dollman Page</p> <p>3</p> <p style="padding-left: 40px;">Direct Examination by Mr. Phillips 6</p> <p>4</p> <p>5 Certificate of Oath 230</p> <p>6 Certificate of Reporter 231</p> <p>7 Errata Sheet 232</p> <p>8 Errata Letter 233</p> <p>9</p> <p style="text-align: center;">- - -</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																																																																																
<p style="text-align: right;">Page 2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3</p> <p style="padding-left: 40px;">APPEARANCE FOR CLAIMANT (Appearing by Zoom)</p> <p>4</p> <p style="padding-left: 40px;">RYAN J. STONEROCK, ESQUIRE Harder LLP</p> <p>5</p> <p style="padding-left: 40px;">132 South Rodeo Drive, Fourth Floor Beverly Hills, California 90212 rstonerock@harderllp.com mmoreno@harderllp.com</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p style="padding-left: 40px;">APPEARANCES FOR RESPONDENT (Appearing by Zoom)</p> <p>10</p> <p style="padding-left: 40px;">JOHN M. PHILLIPS, ESQUIRE ERICA JACKSON, ESQUIRE</p> <p>11</p> <p style="padding-left: 40px;">Phillips & Hunt 212 North Laura Street Jacksonville, Florida 32202 jmp@floridajustice.com erica@floridajustice.com</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16 ALSO PRESENT BY ZOOM: Omarosa Manigault Newman J. Wyndal Gordon, Esquire</p> <p>17</p> <p>18</p> <p>19</p> <p style="text-align: center;">- - -</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">RESPONDENT'S INDEX PAGE</p> <p>1</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 10%;">No.</th> <th style="width: 75%;">Description</th> <th style="width: 10%;">Page</th> </tr> </thead> <tbody> <tr><td>2</td><td>1</td><td>Campaign Ad</td><td>25</td></tr> <tr><td>3</td><td>2</td><td>Campaign Ad</td><td>25</td></tr> <tr><td>4</td><td>3</td><td>Campaign Ad</td><td>33</td></tr> <tr><td>5</td><td>4</td><td>Campaign Ad</td><td>33</td></tr> <tr><td>6</td><td>5</td><td>Campaign Ad</td><td>39</td></tr> <tr><td>7</td><td>6</td><td>Campaign Ad</td><td>41</td></tr> <tr><td>8</td><td>7</td><td>Campaign Ad</td><td>43</td></tr> <tr><td>9</td><td>8</td><td>Campaign Ad</td><td>52</td></tr> <tr><td>10</td><td>9</td><td>Campaign Ad</td><td>56</td></tr> <tr><td>11</td><td>9B</td><td>Video Clip</td><td>58</td></tr> <tr><td>12</td><td>10</td><td>Campaign Ad</td><td>69</td></tr> <tr><td>13</td><td>11</td><td>Campaign Ad</td><td>71</td></tr> <tr><td>14</td><td>12</td><td>Campaign Ad</td><td>73</td></tr> <tr><td>15</td><td>13</td><td>Campaign Ad</td><td>73</td></tr> <tr><td>16</td><td>14</td><td>Campaign Ad</td><td>74</td></tr> <tr><td>17</td><td>15</td><td>Campaign Ad</td><td>81</td></tr> <tr><td>18</td><td>16</td><td>Campaign Ad</td><td>91</td></tr> <tr><td>19</td><td>16B</td><td>Access Hollywood Video Clip</td><td>88</td></tr> <tr><td>20</td><td>16C</td><td>Inside Edition Video Clip</td><td>92</td></tr> <tr><td>21</td><td>16D</td><td>The Howard Stern Show Video Clip</td><td>97</td></tr> <tr><td>22</td><td>16E</td><td>The View Video Clip</td><td>101</td></tr> <tr><td>23</td><td>17</td><td>Campaign Ad</td><td>104</td></tr> <tr><td>24</td><td>18</td><td>Campaign Ad</td><td>113</td></tr> </tbody> </table> <p>25</p>		No.	Description	Page	2	1	Campaign Ad	25	3	2	Campaign Ad	25	4	3	Campaign Ad	33	5	4	Campaign Ad	33	6	5	Campaign Ad	39	7	6	Campaign Ad	41	8	7	Campaign Ad	43	9	8	Campaign Ad	52	10	9	Campaign Ad	56	11	9B	Video Clip	58	12	10	Campaign Ad	69	13	11	Campaign Ad	71	14	12	Campaign Ad	73	15	13	Campaign Ad	73	16	14	Campaign Ad	74	17	15	Campaign Ad	81	18	16	Campaign Ad	91	19	16B	Access Hollywood Video Clip	88	20	16C	Inside Edition Video Clip	92	21	16D	The Howard Stern Show Video Clip	97	22	16E	The View Video Clip	101	23	17	Campaign Ad	104	24	18	Campaign Ad	113
	No.	Description	Page																																																																																														
2	1	Campaign Ad	25																																																																																														
3	2	Campaign Ad	25																																																																																														
4	3	Campaign Ad	33																																																																																														
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8	7	Campaign Ad	43																																																																																														
9	8	Campaign Ad	52																																																																																														
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11	9B	Video Clip	58																																																																																														
12	10	Campaign Ad	69																																																																																														
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21	16D	The Howard Stern Show Video Clip	97																																																																																														
22	16E	The View Video Clip	101																																																																																														
23	17	Campaign Ad	104																																																																																														
24	18	Campaign Ad	113																																																																																														

Page 5

RESPONDENT'S EXHIBIT INDEX		
No.	Description	Page
19	Campaign Ad	116
19A	Video Clip	119
19B	Video Clip	121
19C	Video Clip	125
19D	Video Clip	131
19E	Video Clip	133
19F	Video Clip	136
20	Campaign Ad	144
21	Campaign Ad	150
21B	Companion Agreement	158
21C	Consulting Agreement	159
22	Campaign Ad	164
23	Campaign Ad	167
24	Campaign Ad	171
25	Expert Witness Report	184
26	Legal Action Tweet	216
	- - -	

Page 6

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, and we agree.
 5 MR. STONEROCK: Ryan Stonerock on behalf of
 6 the campaign, and we agree.
 7 SEAN RAY DOLLMAN,
 8 having been produced and first duly sworn as a witness, and
 9 after having responded "Yes, ma'am" to the oath, testified
 10 as follows:
 11 DIRECT EXAMINATION
 12 BY MR. PHILLIPS:
 13 Q Would you please state your name for the
 14 record.
 15 A Sean Ray Dollman.
 16 Q Mr. Dollman, obviously we're in cyberland
 17 these days. Where are you currently located?
 18 A Phoenix, Arizona.
 19 Q Are you at your home or office?
 20 A Home.
 21 Q Okay. Where are you currently employed?
 22 A The campaign, Donald J. Trump for President.
 23 Q Okay. What is your current role with the
 24 campaign?
 25 A Chief financial officer.

Page 7

1 Q Okay. That's essentially how a deposition
 2 goes. Have you ever had your deposition taken before?
 3 A No, sir.
 4 Q Okay. So I kind of want -- I -- I sometimes
 5 do a few test questions to kind of go back and explain
 6 that's perfect or that's not perfect.
 7 It's a question and answer session. Obviously
 8 you've -- you've sworn to tell the truth, so that's --
 9 that's of utmost importance. But you can't tell the
 10 truth if I'm cutting you off or if I'm not allowing you
 11 to answer your full question -- your full answer.
 12 The same thing with my questions. If you
 13 don't hear my full questions, we're gonna have
 14 difficulty, not only with -- with Miss Beth typing this
 15 thing out, but with understanding the -- the
 16 question-answer session and the oath that's underlying
 17 that. So it's absolutely my responsibility to ask you
 18 questions you understand. If you don't understand,
 19 please let me know.
 20 It's unlike a normal conversation in that we
 21 -- we kind of -- in a normal conversation, sometimes
 22 people short-circuit each other. They can kind of fast
 23 forward a conversation because you see where they're
 24 going. We can't do that here. We've got to take turns
 25 and -- and, you know, ask questions and answers -- have

Page 8

1 questions and answers.
 2 If you need to take a break for any reason,
 3 feel free, let me know.
 4 Your attorney may object. We would prefer if
 5 he -- he just states "object to form," meaning that
 6 there was a problem with the form of my question in his
 7 view. Unless he's instructing you not to answer, that
 8 is an objection for the record. You kind of pay it no
 9 mind. And we're preserving a record here, too.
 10 And just answer to the best of your ability. If he
 11 instructs you not to answer, we'll have a conversation
 12 about why that is and -- and go from there.
 13 Any questions as of right now about the -- the
 14 rules of a deposition?
 15 A No, sir.
 16 Q Okay. So what did you say your role was with
 17 the campaign?
 18 MR. STONEROCK: Vague as to time.
 19 BY MR. PHILLIPS:
 20 Q What is your role with the campaign currently?
 21 A Chief financial officer.
 22 MR. PHILLIPS: Mr. Stonerock, please just say
 23 "object to form" and not -- let's try to avoid
 24 speaking objections today.
 25 MR. STONEROCK: I'm gonna object how I'm gonna

Page 9

1 object, and -- and I don't know what else to tell
 2 you.
 3 MR. PHILLIPS: Okay. Professionalism matters,
 4 sir.
 5 BY MR. PHILLIPS:
 6 Q So chief financial officer.
 7 MR. STONEROCK: You could learn something.
 8 BY MR. PHILLIPS:
 9 Q What is a chief financial officer?
 10 A Say it again.
 11 Q What does -- what does the chief financial
 12 officer for Donald J. Trump for President do?
 13 A Pretty much manages all the money on the
 14 campaign. So anything coming in we record it,
 15 and anything going out we record it.
 16 Q Okay. What other roles have you had with the
 17 campaign?
 18 A Deputy operations officer.
 19 Q What is a deputy operations officer?
 20 A Deputy director of operations -- that's what
 21 it was -- and then director of operations.
 22 Q Okay. Anything else?
 23 A No, sir.
 24 Q At some point were you the director of
 25 operations?

Page 10

1 A Yes, sir.
 2 Q When was that?
 3 A Roughly 2017 to the beginning of 2020.
 4 Q And then you became CFO; is that fair?
 5 A Yes, sir.
 6 Q Okay. And I assume -- and you know what
 7 happens when we assume -- but I assume you were the
 8 deputy director of operations before you were the
 9 director of operations; is that correct?
 10 A That is correct.
 11 Q Okay. So sometime up until 2017.
 12 When did you -- when did you become deputy
 13 director of operations?
 14 A I believe it was July of 2016.
 15 Q What is the -- what were your duties
 16 and responsibilities as the deputy director of
 17 operations for Donald J. Trump for President, Inc.?
 18 A Managing contracts that were coming in and out
 19 of the campaign. Just making sure and reviewing them
 20 before the director of operations reviewed them or the
 21 treasurer. And then, also, a lot of the inflow
 22 and outflow. So invoices that came to the campaign, I
 23 would review them before they were paid.
 24 Q Okay. Who was the director of operations at
 25 the campaign while you were the deputy director of

Page 11

1 operations?
 2 A Jeff DeWit.
 3 Q Okay. What were your roles and
 4 responsibilities as the -- as the director of
 5 operations at the campaign?
 6 A Pretty much the same thing. There was a
 7 limited amount of people in 2017 through 2020, the
 8 beginning of 2020. So I reviewed contracts, managed
 9 and approved a lot of the expenses that went out.
 10 And then because it was so limited, just managing
 11 schedules and stuff.
 12 Q What does the campaign do when, I guess -- I
 13 mean, obviously I understand what a political campaign
 14 is to some extent. I've never run one. But help me
 15 understand what a campaign does after an election.
 16 MR. STONEROCK: Objection, incomplete
 17 hypothetical, vague and ambiguous, calls for
 18 speculation.
 19 What election are you talking about, John?
 20 BY MR. PHILLIPS:
 21 Q Did you understand my question, Mr. Dollman?
 22 A I believe so.
 23 Q Okay. Then you can answer it.
 24 A So if -- after an election -- right --
 25 normally a campaign would run into the RNC or the DNC,

Page 12

1 if it was a Democrat, so we would -- we discontinued
 2 fundraising as an entity, and then helping support
 3 other candidates that were also aligned with the
 4 president.
 5 Q Okay. Why would staffing -- I think I know
 6 the answer. But why would staffing shrink after an
 7 election?
 8 A There's less going on -- right -- so we're not
 9 buying as many ads, we're not running a lot of rallies
 10 or events.
 11 Q Why is Donald J. Trump for President, Inc.
 12 still, I guess, a viable political campaign? Why is it
 13 still going?
 14 MR. STONEROCK: Calls for speculation,
 15 incomplete hypothetical, irrelevant.
 16 You can answer if you know, Sean.
 17 THE WITNESS: Well, it will actually -- every
 18 campaign does this. Right? So after an election
 19 there's still FEC compliance, there's still a
 20 wind-down period of a campaign. So as the campaign
 21 you still have the responsibility to the donors
 22 and then, also, to the -- the FEC to make sure that
 23 everything's recorded properly and then the
 24 wind-down. It's just normal -- normal business
 25 process.

Page 13

1 BY MR. PHILLIPS:

2 Q Do you know as we sit here today whether, I

3 guess, Donald J. Trump for President, Inc. is going to

4 continue to exist with, I guess, another presidential

5 candidacy by Donald Trump in -- in mind or in effort?

6 MR. STONEROCK: Objection. It's totally

7 irrelevant. I'm gonna instruct the witness not to

8 answer.

9 BY MR. PHILLIPS:

10 Q Do you know if there's any current intent to

11 wind down, as you put it, the campaign?

12 MR. STONEROCK: Same objection.

13 BY MR. PHILLIPS:

14 Q There is?

15 A Say it again. What are you asking?

16 Q Yes. You discussed the winding down of the

17 campaign. And what I'm trying to understand is, you

18 know, at what -- at what part of a sunset or not, you

19 know, I guess -- let me reask that.

20 You know, where do we -- where do you sit as

21 CFO with the future of Donald J. Trump for President,

22 Inc. as a campaign?

23 MR. STONEROCK: Objection, vague

24 and ambiguous, not reasonably calculated to lead to

25 discoverable evidence.

Page 14

1 John, what's the relevance of this to the case

2 at all?

3 BY MR. PHILLIPS:

4 Q Do you understand my question?

5 A Are you asking myself that?

6 Q Yes.

7 A No, I do not.

8 Q Okay. Do you know if there's a timeline

9 currently to wind down or close out Donald J. Trump for

10 President, Inc.?

11 MR. STONEROCK: Objection, same -- same

12 objections. I'm gonna instruct the witness not to

13 answer.

14 BY MR. PHILLIPS:

15 Q Are you accepting the advice of counsel to not

16 answer that question?

17 A Yes, sir.

18 Q Okay. What's your educational background, Mr.

19 Dollman?

20 A I have three degrees, in management, finance,

21 and then a minor in marketing.

22 Q Where from, and when?

23 A Northern Arizona University, and December

24 2012.

25 Q Any law school?

Page 15

1 A No, sir.

2 Q Okay. So you are not a lawyer. You have had

3 no legal training; is that fair?

4 A That's a hundred percent accurate.

5 Q Okay. Do you have any other -- currently, do

6 you have any other roles or -- do you have any other

7 jobs?

8 A Currently?

9 Q Yes.

10 A Yes, I do.

11 Q What is that?

12 A So I run a company that is also winding down

13 but ran the media for the campaign, media purchasing.

14 Q What do you mean "also winding down"?

15 A We're also closing out the entity because the

16 campaign is no longer around or actually doing

17 business.

18 Q Is that American Made Media Holding?

19 A Yes, sir.

20 Q What does American Made Media Holding do?

21 A So it runs the -- it organizes all the

22 subcontractors to purchase media for the campaign.

23 Q Okay. And what is your current role with

24 American Made Media Holding?

25 A The owner.

Page 16

1 Q Okay. How long have you been owner of

2 American Made Media Holding?

3 A I think we established it April 2018.

4 Q Do you have any -- does American Made Media

5 Holding have any other clients -- well, I guess I need

6 to ask this question. Is Donald J. Trump for

7 President, Inc. a client of American Made Media

8 Holding?

9 A Yes, sir.

10 Q And does American Made Media Holding have

11 other clients currently other than Donald J. Trump for

12 President, Inc.?

13 A Yes, sir.

14 Q Okay. Is Donald J. Trump for President, Inc.

15 still a client of American Made Media Holding?

16 A I think that was why I hesitated answering

17 your last question, because Donald J. Trump for

18 President, Inc. is no longer purchasing media.

19 Q Okay. And why not?

20 A Because it's no longer a campaign.

21 Q Okay. What do you mean "it's no longer a

22 campaign"?

23 A It's winding down so there's no media spent,

24 and we legally cannot purchase media.

25 Q Okay. Do you know if there is a timetable for

Page 17

1 the winding down?

2 MR. STONEROCK: Objection, irrelevant, not

3 reasonably -- not reasonably calculated to lead to

4 the discovery of admissible evidence. I'm gonna

5 instruct the witness not to answer.

6 MR. PHILLIPS: Okay.

7 BY MR. PHILLIPS:

8 Q Has American Made Media Holding received

9 approximately \$166 million from Donald J. Trump for

10 President, Inc.?

11 A Roughly, yes, sir.

12 Q Okay. And that was in media buy services?

13 A Yes, sir.

14 Q Does that include production of the media?

15 A In some cases, yes, sir.

16 Q Yesterday I was sent a Dropbox of, let's see,

17 25 or 26 -- bear with me. I believe 24 videos with a

18 message from your counsel that said, "Here's a Dropbox

19 link with campaign ads relevant to Mr. Dollman's

20 deposition," and there were 24 campaign ads. Do you

21 know how those are relevant to your deposition?

22 A Yes, sir.

23 Q How?

24 A Because we were trying to correct the

25 narrative that Omarosa was publicly saying about the

Page 18

1 president and the campaign.

2 Q Okay. And what was -- what narrative did you

3 have to correct?

4 A Pretty much every statement that she was

5 saying about the campaign.

6 Q Okay. Anything specifically that you had to

7 correct?

8 A That the president is racist and sexist.

9 Q You don't -- do you -- is it true that the

10 president is racist?

11 A No, sir.

12 Q How well do you know Donald J. Trump?

13 A Just not well to the point of, like, personal

14 relationship or anything. Enough to speak with him

15 once, but that's it.

16 Q You've spoken with him once?

17 A Yes, sir.

18 Q So would you agree with me that Omarosa

19 Manigault Newman knows Donald Trump better than Sean

20 Dollman does?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation.

23 You can answer, Sean, if you know.

24 THE WITNESS: Yes.

25 BY MR. PHILLIPS:

Page 19

1 Q Okay. Do you know how long Omarosa Manigault

2 Newman has known Mr. Trump?

3 MR. STONEROCK: Calls for speculation, lacks

4 foundation.

5 You can answer, Sean.

6 THE WITNESS: I think it was 15 or so years.

7 BY MR. PHILLIPS:

8 Q Okay. Do you know if she's spoken with him

9 more than one time?

10 MR. STONEROCK: Same objection.

11 THE WITNESS: I would assume so.

12 BY MR. PHILLIPS:

13 Q Okay. Do you have an opinion as to whether --

14 I believe it was racist and sexist. Do you have an

15 opinion as to whether Donald J. Trump is sexist?

16 A No, sir.

17 Q You don't have an --

18 A Do I have an opinion? No, I don't believe he

19 is, sir.

20 Q Okay. Is someone free to have an opinion in

21 this country about whether somebody is racist or

22 sexist?

23 MR. STONEROCK: Objection, incomplete

24 hypothetical, calls for a legal conclusion, vague

25 and ambiguous as to the term "free."

Page 20

1 You can answer it if you understand it, Sean.

2 THE WITNESS: Can you say it again, sir?

3 BY MR. PHILLIPS:

4 Q Yeah. Is someone allowed in the United States

5 of America to have an opinion about whether they

6 consider somebody else racist?

7 MR. STONEROCK: Objection, incomplete

8 hypothetical, calls for a legal conclusion.

9 You can answer if you understand, Sean.

10 THE WITNESS: Yes, sir.

11 BY MR. PHILLIPS:

12 Q And is somebody allowed to have an opinion in

13 this country about whether they consider somebody

14 sexist?

15 MR. STONEROCK: Same objection.

16 THE WITNESS: Yes, sir.

17 BY MR. PHILLIPS:

18 Q Did you find the statements that -- we'll come

19 back to that.

20 Let's do this. Can you see any portion of --

21 of my screen?

22 A Yes, sir.

23 Q Okay. And it says "Campaign Ads 1 through

24 24"?

25 A Yes, sir.

Page 21

1 Q Okay. Can you now see a video uploading or --
 2 or booting up?
 3 A Negative. All I see is the highlighted
 4 campaign.
 5 Q Now can you?
 6 A No, sir.
 7 Q Okay. If I play this video, can you -- let me
 8 know if you can watch it.
 9 A No, sir.
 10 MR. STONEROCK: We can hear it but not watch
 11 -- see it, John.
 12 MR. PHILLIPS: Okay. Let me fix it.
 13 BY MR. PHILLIPS:
 14 Q Okay. I'm sharing my screen now. Let's try
 15 now. Can you see that?
 16 A It still says starting the screen sharing.
 17 Q Okay.
 18 MR. STONEROCK: John, you should open the
 19 video before you start your screen sharing.
 20 MR. PHILLIPS: Thanks, Ryan.
 21 BY MR. PHILLIPS:
 22 Q Ah-ha. Now do you see the intro to the video?
 23 A No, sir.
 24 Q It's got the green box around it like you do.
 25 So you can hear that but not see it?

Page 22

1 A Yes, sir.
 2 MR. PHILLIPS: The same for you, Beth? Are
 3 you not seeing that on your end?
 4 COURT REPORTER: Exactly. I can hear it but
 5 not see it.
 6 BY MR. PHILLIPS:
 7 Q Same?
 8 A Same, sir.
 9 Q I pulled up videos last time. I'm not quite
 10 sure why it's not pulling it up. Can you see my
 11 desktop?
 12 A No, sir.
 13 Q Let me know if anything changes. Video.
 14 There we go. Let's try this way. I assume you can't
 15 see that.
 16 A No, I can see it.
 17 Q Can you? All right. So you can see that
 18 commercial, Mr. Dollman?
 19 A Yes, sir.
 20 Q Okay. Let's watch it.
 21 (Playing video:)
 22 UNKNOWN SPEAKER: President Donald Trump,
 23 everything he stands for I believe in. I stand
 24 with him. I fight with him. I ride with him.
 25 UNKNOWN SPEAKER: How do you feel about

Page 23

1 President Trump?
 2 UNKNOWN SPEAKER: I'm very honored
 3 and grateful that he signed the First Step Act, so
 4 I have nothing but respect and thankfulness for
 5 that.
 6 ALICE JOHNSON: I can do everything. I want
 7 to thank President Donald John Trump.
 8 UNKNOWN SPEAKER: I love President Trump
 9 because to him every life matters, lives of African
 10 Americans, lives of all races about unity and
 11 togetherness. And that's one of the main reasons
 12 why I -- why I voted for the president.
 13 DONALD J. TRUMP: We are reminded of our
 14 nation's path towards civil rights and the work
 15 that still remains to be done.
 16 (End of playing video.)
 17 BY MR. PHILLIPS:
 18 Q Was that a commercial that was, I guess,
 19 produced or distributed by American Made Media Holding?
 20 A Yes, sir.
 21 Q For what purpose?
 22 A Again, for correcting the narrative that
 23 Omarosa was publicly saying.
 24 Q What specifically?
 25 A That President Trump is racist.

Page 24

1 Q Let's go on to 2, which is a 35-second ad.
 2 Can you see that? Can you see that video?
 3 A Yes, sir.
 4 (Playing video:)
 5 UNKNOWN SPEAKER: I'm blessed to be able to
 6 run inner city youth programs and to also teach in
 7 prisons across America. The inmates in my federal
 8 prison program literally received days off their
 9 sentence just for attending my class, and that's
 10 thanks to President Donald Trump and his First Step
 11 Act. President Trump cared about these Americans
 12 and their families even when so many others had
 13 left them behind and had written them off. I'm
 14 forever grateful for President Trump for that.
 15 (End of video.)
 16 BY MR. PHILLIPS:
 17 Q Referring to, I guess, ad -- campaign ad
 18 number 2 that was sent to us, was that produced or
 19 distributed by American Made Media Holding?
 20 MR. STONEROCK: Objection, compound, vague
 21 and ambiguous as to produced or distributed.
 22 MR. PHILLIPS: Sure.
 23 BY MR. PHILLIPS:
 24 Q Was that -- was that commercial, campaign ad
 25 number 2 --

Page 25

1 MR. PHILLIPS: And we'll attach 1 as Exhibit 1
 2 and 2 as Exhibit 2 to this deposition and -- and go
 3 on through with that nomenclature, which we'll
 4 delineate as we go forward.
 5 (Respondent's Exhibits 1 and 2 were identified
 6 and later marked for identification.)
 7 BY MR. PHILLIPS:
 8 Q But was campaign ad number 2 produced by
 9 American Made Media Holding?
 10 MR. STONEROCK: Vague and ambiguous as to
 11 produced.
 12 You can answer, Sean, if you know.
 13 THE WITNESS: Paid for by American Made Media
 14 through a subcontractor, so the subcontractor
 15 actually produced it.
 16 BY MR. PHILLIPS:
 17 Q Okay. Who was the subcontractor?
 18 A For that one it -- it was either We Are
 19 Politics -- there was a couple. So that was actually
 20 during convention. Right? So there was a couple
 21 different entities that produced and put the videos
 22 together for convention.
 23 Q Okay. Where were these distributed? Where
 24 was that one distributed, I guess?
 25 A That would have been digital, and then also

Page 26

1 during convention.
 2 Q Okay. Digital. Who was the focus of the
 3 digital campaign?
 4 A Anybody that will watch it for the campaign.
 5 Q Was it targeted towards African Americans?
 6 A I think it was targeted to voters.
 7 Q Okay. What role, if any, did American Made
 8 Media Holdings have with -- with campaign ad number 2?
 9 A I don't understand that question. Can you
 10 rephrase it?
 11 Q What -- what did -- did American Made Media
 12 Holding have anything to do with whether production or
 13 distribution with campaign ad number 2 that we just
 14 watched?
 15 A It would have paid for the production of the
 16 campaign, and then also the distribution through
 17 digital assets or even during the convention.
 18 Q Okay. Are you aware of any statements Omarosa
 19 Manigault Newman made in any way disparaging or
 20 discussing the First Step Act?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation.
 23 You can answer if you know, Sean.
 24 THE WITNESS: Not to my knowledge.
 25 BY MR. PHILLIPS:

Page 27

1 Q Do you know any comments or can you identify
 2 any comments Omarosa Manigault Newman made about
 3 African-American inmates or Trump's treatment of
 4 African-American inmates?
 5 MR. STONEROCK: Same objections.
 6 THE WITNESS: No, sir.
 7 BY MR. PHILLIPS:
 8 Q Okay. So is it your contention that this
 9 campaign ad was designed to be a counternarrative of
 10 comments Omarosa Manigault Newman made?
 11 A Yes, sir.
 12 Q How?
 13 A Racism. She said the president was racist.
 14 Q Okay. So just putting in an ad which features
 15 African Americans contradicts racism?
 16 A Features or --
 17 Q Actually -- actually -- I'm sorry. Go ahead.
 18 A So you said "features African Americans." So
 19 I don't think that just because it features African
 20 Americans contradicts racism. But promoting
 21 and permanently funding HBCUs and then, also, the First
 22 Step Act and everything, yes, it does.
 23 Q What is racism?
 24 A What -- what is racism?
 25 Q Yeah. You've used the word a couple times

Page 28

1 and said Omarosa was guilty of portraying Donald Trump
 2 as a racist. What is racism?
 3 A She actually said --
 4 MR. STONEROCK: His definition of racism?
 5 MR. PHILLIPS: His definition. I just want to
 6 make sure we're on the same page. What he's
 7 referring to related to racism.
 8 THE WITNESS: Yeah, I'm referring to Omarosa's
 9 comment of saying that the president is racist, not
 10 comments of, like, what is speculating or what the
 11 definition of racism is. But she said that the
 12 president is racist. So that comment of saying
 13 that he's racist would -- that's what we were
 14 trying to correct.
 15 My definition of racism is someone that
 16 probably -- I mean, someone that hates or despises
 17 or dislikes another individual based off of the
 18 color of their skin.
 19 BY MR. PHILLIPS:
 20 Q Merely dislikes, not has preferential
 21 treatment towards ones own race?
 22 A Say that again. Sorry. I need to turn it up.
 23 Q Is having preferential treatment towards ones
 24 own race racism?
 25 MR. STONEROCK: Incomplete hypothetical, calls

Page 29

1 for speculation, lacks foundation.
 2 You can answer, Sean, if you understand.
 3 THE WITNESS: Can you rephrase it?
 4 BY MR. PHILLIPS:
 5 Q Sure. My understanding of -- of -- and I
 6 realize racism's a complex topic, so I don't want to
 7 just say one sentence is your definition of racism.
 8 But you discussed how, you know, I guess, being
 9 negative to one race is racism. But I'm asking whether
 10 preferential treatment, so -- so white people
 11 preferring white people, is that -- is that racism in
 12 your definition?
 13 MR. STONEROCK: Objection, incomplete
 14 hypothetical, calls for speculation, lacks
 15 foundation.
 16 You can answer if you understand, Sean.
 17 THE WITNESS: Yeah, I mean, I didn't say a
 18 certain race. Right? I said anybody or any human
 19 or anything by the color of their skin. So you can
 20 be white and not like white people -- right --
 21 and be racist against your own race, yes.
 22 BY MR. PHILLIPS:
 23 Q Okay. Let's move on to number 3.
 24 (Playing video:)
 25 UNKNOWN SPEAKER: I caught my very first

Page 30

1 felony conviction at 16 years old. I was arrested
 2 for a string of bank robberies. And as I laid on
 3 that stainless steel cell, shackled by my hands
 4 and my feet, I heard God utter into my spirit: My
 5 son, I honored what you asked me to do.
 6 President Trump, he had made a bunch of
 7 promises. Let me just be transparent. When he
 8 first started talking about the things he was gonna
 9 to do, I'm sitting there going: Wait a minute
 10 here. I mean, is he serious? Because everything
 11 that he was saying that he wanted to do was the
 12 stuff that needs to be done.
 13 (End of playing video.)
 14 BY MR. PHILLIPS:
 15 Q Okay. Referring to the ad we just showed you,
 16 campaign ad number 3, produced to us by your counsel,
 17 how -- how at all did that counteract any disparaging
 18 or defamatory comment by Omarosa Manigault Newman?
 19 MR. STONEROCK: Objection, compound, calls for
 20 speculation, lacks foundation.
 21 You can answer, Sean, if you know.
 22 THE WITNESS: The -- can you say that again?
 23 I apologize.
 24 BY MR. PHILLIPS:
 25 Q Yeah. I'm just -- just curious about campaign

Page 31

1 ad number 3 and why that was produced to us.
 2 A Because the president promised that he was
 3 gonna be there for the American people, and this video
 4 right here said he kept his promises. And what he said
 5 he was gonna do, he's gonna do. And that it didn't
 6 matter what race you were or anything, he's gonna look
 7 out for the American individuals and families, which
 8 are the promises he made.
 9 Q And what specifically did Omarosa Manigault
 10 Newman do that contradicted any of that or disparaged
 11 any of that?
 12 A She said he was racist.
 13 Q Okay. Did she comment about that specific
 14 incarcerated African-American man?
 15 MR. STONEROCK: Calls for speculation, lacks
 16 foundation, incomplete hypothetical.
 17 You can answer if you know, Sean.
 18 THE WITNESS: Not to my knowledge I don't. I
 19 am unsure of that.
 20 BY MR. PHILLIPS:
 21 Q Okay. Everything Trump is saying -- I think
 22 there was a line in there.
 23 (Playing video:)
 24 UNKNOWN SPEAKER: I mean, is he serious?
 25 Because everything that he was saying that he

Page 32

1 wanted to do was the stuff that needs to be done.
 2 (End of video.)
 3 BY MR. PHILLIPS:
 4 Q Okay. "Everything he said" -- and it's
 5 actually on the screen, "Everything he said he was
 6 going to do needed to be done." Did Omarosa Manigault
 7 Newman say anything about Mr. Trump that contradicted
 8 that statement?
 9 MR. STONEROCK: Calls for speculation, lacks
 10 foundation, incomplete hypothetical.
 11 You can answer if you know, Sean.
 12 THE WITNESS: Statements and public statements
 13 of being a racist, I would say it would make it to
 14 where she said that he is not going to actually
 15 help all Americans, just specific Americans. So I
 16 would say, in a roundabout way, yes. But
 17 specifically to that, I am unsure.
 18 BY MR. PHILLIPS:
 19 Q Okay. Was Omarosa the only person in the
 20 entire world calling Donald Trump a racist?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, vague as to time.
 23 You can answer if you know, Sean.
 24 THE WITNESS: In the entire world, no, sir.
 25 MR. PHILLIPS: Okay. I'm going to attach 3 as

Page 33

1 Plaintiff's Exhibit 3.
 2 (Respondent's Exhibit 3 was identified and
 3 later marked for identification.)
 4 BY MR. PHILLIPS:
 5 Q Moving on to campaign ad 4. Or was that 4?
 6 No. This is the human side.
 7 (Playing video:)
 8 UNKNOWN SPEAKER: Back in 2002, I was arrested
 9 for conspiracy. I was convicted on that single
 10 charge for 50 grams or more of crack or five
 11 kilograms of cocaine, and sentenced to life without
 12 the possibility of parole.
 13 With the First Step Act, that was something
 14 that needed to be done for quite some time.
 15 And President Trump was able to come in there. You
 16 have to look at the human side.
 17 (End of video.)
 18 (Respondent's Exhibit 4 was identified and
 19 later marked for identification.)
 20 BY MR. PHILLIPS:
 21 Q The human side, was that an ad in any way done
 22 or distributed by American Made Media Holding?
 23 MR. STONEROCK: Vague as to done or
 24 distributed.
 25 You can answer if you know, Sean.

Page 34

1 THE WITNESS: We paid a subcontractor for
 2 production of that ad, yes.
 3 BY MR. PHILLIPS:
 4 Q And then you -- American Made distributed it?
 5 MR. STONEROCK: Vague as to the term
 6 "distributed."
 7 You can answer, Sean.
 8 THE WITNESS: We paid for the distribution of
 9 it, yes.
 10 BY MR. PHILLIPS:
 11 Q Okay. And do you know where that one was
 12 distributed?
 13 A That one looks like it was, obviously, a
 14 digital ad, and I would think by the production of it
 15 possibly also for the convention as well.
 16 Q Okay. Do you know if that was targeted to
 17 African-American individuals or African-American
 18 communities?
 19 A I think it was more of the First Step Act,
 20 and then the president's policies to get the First Step
 21 Act through.
 22 Q Can one -- bear with me on this hypothetical.
 23 Can one pass pro African-American legislation and still
 24 be racist?
 25 MR. STONEROCK: Calls for speculation, lacks

Page 35

1 foundation, incomplete hypothetical.
 2 You can answer the question if you understand
 3 it, Sean.
 4 THE WITNESS: I think if you're truly racist,
 5 then you probably wouldn't promote and push
 6 legislation to help a certain race. So, no, I
 7 don't think so.
 8 BY MR. PHILLIPS:
 9 Q Okay. So if you're truly racist, you're gonna
 10 do nothing to help a certain race even if it benefits
 11 you?
 12 MR. STONEROCK: Calls for speculation, lacks
 13 foundation, incomplete hypothetical.
 14 You can answer, Sean.
 15 THE WITNESS: Are you saying for the benefit
 16 of an individual if he's truly racist?
 17 BY MR. PHILLIPS:
 18 Q Obviously these were paid to -- these were
 19 paid ads to achieve votes, were they not?
 20 A They were paid ads to correct a narrative,
 21 yes, sir. Right. And then --
 22 Q For what purpose?
 23 A -- the narrative being --
 24 Say again, sir.
 25 Q What -- what's the purpose of correcting the

Page 36

1 narrative?
 2 A The purpose of correcting a narrative?
 3 Q Yes.
 4 A To get the message to the voters to correct
 5 the narrative.
 6 Q Okay. And so the voters to -- so it's -- does
 7 it matter what somebody thinks or what they do in this
 8 instance? Obviously it seems to me that the purpose
 9 was to get -- you had a -- you had a campaign going on,
 10 so the purpose was to get votes for Donald Trump;
 11 correct?
 12 A The purpose is -- it's -- it's kind of
 13 two-sided. Right? So if you are going to correct the
 14 narrative, you want to make sure that people understand
 15 that the president is not racist and he does want to
 16 look out for the American people and it doesn't matter
 17 what race you are.
 18 But, also, that if you are on -- if you are
 19 borderline or on the edge of a vote, then, yes. Like,
 20 it is to let them know that if your vote is because of
 21 a racism thing that another individual said, then it's
 22 to correct the narrative.
 23 Q Do you have the name of any individual who
 24 said they did not vote for Donald Trump because Omarosa
 25 Manigault Newman said he was racist?

Page 37

1 A No, sir.

2 Q Okay. Do you have a name of any individual

3 who said he did not -- he or she did not vote for

4 Donald J. Trump because he was sexist, because Omarosa

5 said he was sexist?

6 A No, sir.

7 Q Okay.

8 A Also, to follow up on that, it's not like I

9 have a very big circle of individuals I talk to daily,

10 so . . .

11 Q Okay. But you got -- your company got paid

12 200 and -- \$166 million to run a campaign for Donald

13 Trump. Did you spend any of that on polling to

14 determine what Donald Trump's true opinion was in the

15 African-American community, or what the

16 African-American community's true opinion was of Donald

17 Trump?

18 MR. STONEROCK: You're asking about the

19 campaign or the, you know, separate entity that did

20 media buy?

21 MR. PHILLIPS: I mean, that's the problem with

22 this. Okay. Fair enough.

23 BY MR. PHILLIPS:

24 Q Did American -- with the \$166 million received

25 by American Made Media Holding, did they conduct any

Page 38

1 focus groups to determine whether Omarosa Manigault

2 Newman's expressed opinion that Donald Trump was racist

3 was in need of -- of countermessaging? Was there any

4 focus group on that?

5 MR. STONEROCK: Calls for speculation, lacks

6 foundation.

7 You can answer, Sean, if you know.

8 THE WITNESS: American Made Media Consultants

9 or Holdings didn't -- never spent money on polling.

10 It is not actually media driven -- right -- so

11 polling is more internal for the campaign.

12 BY MR. PHILLIPS:

13 Q So why did either American Made -- well, I

14 guess, why did Donald J. Trump for President, Inc. feel

15 that -- like on what did -- did Donald J. Trump for

16 President, Inc. base its decision that it needed to run

17 these at least 24 campaign ads because of Omarosa

18 Manigault Newman?

19 MR. STONEROCK: Calls for speculation, lacks

20 foundation.

21 You can answer, Sean, if you know.

22 THE WITNESS: Probably from polling.

23 BY MR. PHILLIPS:

24 Q Can you -- can you cite to any poll? Do we --

25 do we know who did the polling?

Page 39

1 A That was not my role on the campaign, so I

2 cannot cite to it.

3 MR. PHILLIPS: Okay. Moving on to campaign ad

4 number 5, which we'll attach as Exhibit 5.

5 (Respondent's Exhibit 5 was identified and

6 later marked for identification.)

7 (Playing video:)

8 ERIC BALCOM: It's an overwhelming feeling,

9 and I'm just glad to be free.

10 VOICEOVER: Eric Balcom has waited 16 years

11 for this moment. His first breaths of freedom

12 after being released from federal prison in Jesup,

13 Georgia.

14 ERIC BALCOM: I can't be bitter about all that

15 I've missed. I've just got to be thankful

16 and grateful for the new memories that I can make.

17 (End of video.)

18 BY MR. PHILLIPS:

19 Q What is the First Step Act, to your

20 understanding?

21 MR. STONEROCK: Calls for a legal conclusion,

22 lacks foundation, calls for speculation.

23 You can answer it if you have an

24 understanding, Sean.

25 THE WITNESS: I believe it's to shorten a

Page 40

1 sentence for an individual for -- I guess that

2 would probably be it -- for, like, good behavior

3 and for crimes that may not have been -- and this

4 is just what I think it is. I'm --

5 BY MR. PHILLIPS:

6 Q Yeah, yeah.

7 A -- not really sure. Right. Crimes that --

8 where they got more time or more sentence than they

9 probably -- it just didn't fit the crime.

10 Q Okay. And I -- I don't want to ask you a

11 question I've already asked you. I think this is

12 different. But can one -- well -- well, let me go

13 back.

14 This commercial, campaign ad number 5, can you

15 point to any statement by Omarosa Manigault Newman that

16 addressed any of the issues in campaign number 5,

17 Mr. Balcom, First Step Act, anything related to those

18 issues?

19 MR. STONEROCK: Objection, compound, vague

20 and ambiguous, vague as to any of the issues.

21 Sean, you can answer if you understand the

22 question.

23 THE WITNESS: Specific statements, not off the

24 top of my head. Multiple statements on television,

25 Twitter, radio, I would say yes.

Page 41

1 BY MR. PHILLIPS:

2 Q Okay. Again, the general -- the general

3 comments related to racism and Donald Trump; right?

4 A Correct.

5 MR. PHILLIPS: Okay. Campaign ad 6, Omarosa's

6 Exhibit 6.

7 (Respondent's Exhibit 6 was identified and

8 later marked for identification.)

9 UNKNOWN SPEAKER: I stand for all his

10 policies, both religiously and politically.

11 UNKNOWN SPEAKER: He's already done so much

12 for the country. And he's -- he's really doing a

13 great job.

14 UNKNOWN SPEAKER: As far as abortion goes,

15 that was one of my big issues. I very heavily

16 stand for the unborn, and so his -- his policies as

17 far as that goes has really, really affected me.

18 (End of video.)

19 BY MR. PHILLIPS:

20 Q Do you know of Donald Trump's opinions, true

21 opinions, about abortion?

22 MR. STONEROCK: Objection, calls for

23 speculation, lacks foundation, vague as to true

24 opinions.

25 You can answer if you know, Sean.

Page 42

1 THE WITNESS: Oh, okay. All right.

2 No, sir.

3 BY MR. PHILLIPS:

4 Q Okay. I just -- I see a trend with 4, 5, 6,

5 3. They're -- they're isolated African-American

6 individuals. Did you meet any of these individuals?

7 MR. STONEROCK: Objection, mischaracterizes

8 the advertisements, compound.

9 You can -- you can answer, Sean, if you

10 understand.

11 THE WITNESS: No, sir.

12 BY MR. PHILLIPS:

13 Q Okay. Did you discuss whether they

14 believed -- I mean, I understand they were a proponent

15 of the First Step Act or -- or Donald Trump's abortion

16 policies. But do you know whether these individual

17 people featured in the commercial would believe that --

18 or would have any views about whether or not Donald

19 Trump is a racist?

20 MR. STONEROCK: Calls for speculation, lacks

21 foundation, mischaracterizes the videos.

22 You can answer, Sean, if you understand.

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

24 question, please?

25 BY MR. PHILLIPS:

Page 43

1 Q Sure. I'm just trying to understood, like,

2 Mr. Balcom or the young lady who was talking about

3 Donald Trump's abortion views and that's why she

4 supported him, do you know whether they -- they hold

5 any views whatsoever about whether -- even though they

6 agree with him on certain issues that they feel that

7 Donald Trump is a racist?

8 MR. STONEROCK: Objection, calls for

9 speculation, lacks foundation, mischaracterizes the

10 videos.

11 You can answer, Sean.

12 THE WITNESS: No, sir.

13 BY MR. PHILLIPS:

14 Q Okay.

15 MR. PHILLIPS: Omarosa's Exhibit -- that was

16 6. Now we're going to 7.

17 (Respondent's Exhibit 7 was identified and

18 later marked for identification.)

19 BY MR. PHILLIPS:

20 Q Based upon the shape of that one, was that an

21 Instagram ad? Do you know where that ad aired,

22 campaign 6?

23 A No, sir.

24 Q Okay.

25 A I would assume digital based off of the look

Page 44

1 of it.

2 Q Okay. Do you have or does the campaign have

3 either -- either American Made Media Holding or the

4 campaign maintain the statistics for where these ads

5 aired and how much was paid for each one?

6 A We have a -- a rough estimate as of right now

7 because it is multiple ads going out at one time.

8 Q Okay.

9 A But if we had to dive down into it, we would

10 be able to pull the dollar amount anyway.

11 Q Did Omarosa Manigault Newman address anything

12 that you're aware of about Donald Trump's opinions on

13 abortion?

14 MR. STONEROCK: Calls for speculation, lacks

15 foundation.

16 You can answer, Sean.

17 THE WITNESS: Can you repeat that again,

18 please, sir?

19 BY MR. PHILLIPS:

20 Q Yeah. The campaign ad number 6 largely was

21 addressed on abortion policies.

22 A Uh-huh.

23 Q Do you know whether Omarosa Manigault Newman

24 made any statements about -- or can you identify any

25 statements made by Omarosa Manigault Newman about

Page 45

1 Trump's abortion policies?

2 MR. STONEROCK: Calls for speculation, lacks

3 foundation, mischaracterizes the advertising.

4 You can answer, Sean.

5 THE WITNESS: No, sir.

6 BY MR. PHILLIPS:

7 Q Okay. Campaign ad number 7, Exhibit Number 7.

8 (Playing video:)

9 PASTOR C. L. BRYANT: Hi, friends. I'm C. L.

10 Bryant. Black Voices for Trump is building a MAGA

11 army across America to do everything we possibly

12 can to get President Donald John Trump reelected.

13 Why? Because he has been the greatest champion

14 that black people have had in this country for a

15 long, long time. Help us, Black Voices for Trump,

16 reelect Donald John Trump to the presidency.

17 Become an official member of Black Voices for Trump

18 and help keep America great.

19 (End of video.)

20 BY MR. PHILLIPS:

21 Q Referring to campaign ad number 7 -- I -- I

22 guess let me ask a prerequisite question. What's the

23 difference between a fact and an opinion?

24 MR. STONEROCK: Objection, calls for a legal

25 conclusion, incomplete hypothetical.

Page 46

1 You can answer if you have an understanding,

2 Sean.

3 THE WITNESS: A fact and an opinion?

4 BY MR. PHILLIPS:

5 Q Yeah.

6 A I mean, to me it sounds dumb, but a fact is a

7 fact. Like there's an actual hard-telling truth behind

8 it, and then an opinion is your own formed belief about

9 an individual or anything. Right.

10 Q As Pastor Bryant said, that Donald Trump has

11 been the greatest champion for black people, is that a

12 fact or an opinion?

13 MR. STONEROCK: Objection, calls for a legal

14 conclusion, calls for speculation, lacks

15 foundation.

16 You can answer if you have an understanding.

17 THE WITNESS: What was the entire comment that

18 he said? Wasn't it in a long, long time?

19 BY MR. PHILLIPS:

20 Q Let me get it specifically correct.

21 A Because anything out of context, I guess,

22 would be . . .

23 (Playing video:)

24 UNKNOWN SPEAKER: . . . reelected. Why?

25 Because he has been the greatest champion that

Page 47

1 black people have had in this country for a long,

2 long time. Help us, Black Voices for Trump,

3 reelect Donald John Trump to the presidency.

4 Become an official member of Black Voices for Trump

5 and help keep America great.

6 (End of video.)

7 BY MR. PHILLIPS:

8 Q You were correct. So the subtitles, I can

9 read it.

10 I believe the quote was Donald Trump, he, but

11 Donald Trump, has been the greatest champion that black

12 people have had in this country for a long, long time.

13 Is that a fact or an opinion?

14 MR. STONEROCK: Objection, calls for a legal

15 conclusion, relevance.

16 You can answer if you have an understanding,

17 Sean.

18 THE WITNESS: I believe that's a fact.

19 BY MR. PHILLIPS:

20 Q Oh, okay.

21 A I mean, like, here's -- here's the issue,

22 though. It depends on -- it's an opinion and a fact to

23 me. Right? The fact is every other president before

24 Donald Trump has said that they're gonna look out for

25 the African-American community and other communities

Page 48

1 within America, and they haven't. President Trump

2 actually did stick to his promises, so that's a fact --

3 Q Okay. Isn't the president --

4 A -- for the community -- for the community.

5 Q And don't -- sorry.

6 It says that Donald Trump has been the

7 greatest champion -- the greatest single -- how many

8 greatest champions are there?

9 MR. STONEROCK: Objection, vague.

10 Sorry, John. Did you finish?

11 MR. PHILLIPS: Yeah. Well, let me start over.

12 BY MR. PHILLIPS:

13 Q I guess it's -- it's the pastor's words. Was

14 -- was Dr. King a greater champion for -- for black

15 people in this country than Donald Trump?

16 MR. STONEROCK: Objection, relevance, calls

17 for speculation, lacks foundation, incomplete

18 hypothetical.

19 Sean, you can answer if you have an

20 understanding of the question.

21 THE WITNESS: No, I -- I -- I guess I don't

22 understand the question. Can you please rephrase

23 it?

24 BY MR. PHILLIPS:

25 Q Was Dr. -- was Dr. Martin Luther King -- do

Page 49

1 you know who Dr. Martin Luther King is?

2 A Yes, sir.

3 Q Okay. Was Dr. Martin Luther King a greater

4 champion for black people than Donald Trump?

5 MR. STONEROCK: Objection, incomplete

6 hypothetical, vague as to greater champion, calls

7 for speculation, lacks foundation.

8 You can answer it, Sean, if you have an

9 understanding of the question.

10 THE WITNESS: I think -- I think it's relevant

11 to a time. Right? So was he greater at that time?

12 Obviously, because Donald Trump wasn't around.

13 But was Michael -- Michael Jordan the greatest

14 basketball player of all time? Was he better than

15 LeBron James? That's your problem. Right?

16 So it's not within the same time and within

17 that same time frame.

18 BY MR. PHILLIPS:

19 Q Donald Trump -- Donald Trump didn't exist at

20 the same time as Dr. King?

21 A Say it again.

22 Q Did Donald Trump exist at the same time as Dr.

23 King?

24 MR. STONEROCK: Vague as to exist.

25 BY MR. PHILLIPS:

Page 50

1 Q Did they live in the same . . .

2 A I -- what I mean by that is, like, in the

3 champion or in the -- like champion for African

4 Americans. Right? So it wasn't the same -- not even

5 the same time frame, no.

6 Q Okay. Do you know how old Donald Trump is?

7 A Early 70s.

8 Q Okay. Is Barack Obama -- was Barack Obama a

9 greater champion for black people than Donald Trump?

10 MR. STONEROCK: Objection, vague as to greater

11 champion, incomplete hypothetical, relevance.

12 You can answer, Sean, if you have an

13 understanding.

14 THE WITNESS: I don't believe so, no.

15 BY MR. PHILLIPS:

16 Q Okay. But that's -- what I'm trying to get at

17 is that's your opinion. Somebody could believe that

18 Obama was far greater than Donald Trump for the African

19 American and civil rights; right? That's -- that's --

20 that's -- that's a matter of opinion; right?

21 MR. STONEROCK: Objection, calls for a legal

22 conclusion, incomplete hypothetical.

23 You can answer, Sean.

24 THE WITNESS: I think it still is based on

25 some type of fact. Right? President Obama was

Page 51

1 great for the African-American community in the

2 fact that he was president and he did have a lot of

3 policies. But I think President Trump actually

4 stuck -- stuck to his promises.

5 And, again, I get what you're saying, that it

6 is an opinion, but I think there is some factual

7 background.

8 BY MR. PHILLIPS:

9 Q Did -- did President Obama ever call

10 African-American countries shithole countries?

11 MR. STONEROCK: Objection, calls for

12 speculation, lacks foundation, relevance.

13 You can answer, Sean, if you know.

14 THE WITNESS: Not to my knowledge.

15 BY MR. PHILLIPS:

16 Q Did Donald Trump ever call African nations

17 shithole countries?

18 MR. STONEROCK: Calls for speculation, lacks

19 foundation.

20 You can answer if you know, Sean.

21 THE WITNESS: I do not.

22 BY MR. PHILLIPS:

23 Q We'll come back to that.

24 Campaign ad number 8.

25 (Playing video:)

Page 52

1 ALICE JOHNSON: I'm free to hug my family.

2 UNKNOWN SPEAKER: Yes.

3 ALICE JOHNSON: I'm free to start over. This

4 is the greatest day of my life. My heart is just

5 bursting with gratitude. I want to thank President

6 Donald John Trump. Thank you, thank you, thank

7 you.

8 DONALD J. TRUMP: I'm Donald Trump and I

9 approve this message.

10 (End of video.)

11 (Respondent's Exhibit 8 was identified and

12 later marked for identification.)

13 BY MR. PHILLIPS:

14 Q Did -- did Ms. Johnson, in -- in campaign ad

15 number 8, Exhibit 8, express her opinion about whether

16 or not Donald Trump was a racist?

17 A I do not know, sir.

18 Q Okay. Did the fact that she said -- I mean,

19 what comment by Omarosa Manigault Newman in any way was

20 contradicted by Alice Johnson saying, "I'm free to

21 start over," "my heart is just bursting"? I mean, was

22 there anything that Ms. Newman said about Ms. Johnson

23 or, I guess, the First Step Act? I know we've asked

24 that, but I just want to go through all these

25 commercials.

Page 53

1 MR. STONEROCK: Calls for speculation, lacks
2 foundation.
3 You can answer if you understand the question,
4 Sean.
5 THE WITNESS: I think it still goes back to
6 the fact that she said he was racist.
7 BY MR. PHILLIPS:
8 Q Okay. So far we're at -- we're at campaign ad
9 number 8, and what I'm seeing is in -- in order to
10 respond to an allegation of racist, that Donald Trump
11 was racist, American Made Media Holding made a lot of
12 money finding African Americans who support Donald
13 Trump; is that correct?
14 MR. STONEROCK: Objection, misstates his
15 testimony, misstates the videos, compound,
16 argumentative.
17 You can answer if you understand the question,
18 Sean.
19 THE WITNESS: That's false.
20 BY MR. PHILLIPS:
21 Q What's false?
22 A That American Made Media Holding made a lot of
23 money off of this.
24 Q 166 -- do you know what portion of the \$166
25 million was made off of these 24 ads?

Page 54

1 A None.
2 Q None.
3 A Correct.
4 Q Why?
5 A Say again.
6 Q Why?
7 A Because American Made Media Consulting was the
8 media aggregate and purchaser who hired subcontractors
9 to fulfill the requests.
10 Q You don't get a -- a contingency or placement
11 fee? Does American Made Media get a contingent fee or
12 a placement fee or any -- any percentage of -- of the
13 -- the amounts spent on this campaign?
14 A No, sir.
15 Q Was this intentionally done pro bono, or -- or
16 is this -- I guess I need to understand what American
17 -- how American Made Media Holding was compensated.
18 MR. STONEROCK: Vague as to intentional, vague
19 and ambiguous as to pro bono.
20 You can answer, Sean, if you know.
21 THE WITNESS: So American Made Media
22 Consultants was -- or Holding Company was not
23 compensated based off a per purchase or a
24 percentage, correct.
25 BY MR. PHILLIPS:

Page 55

1 Q Okay. So there was a -- was it a monthly rate
2 or an annual rate that American Made Media Holding
3 negotiated with Donald J. Trump for President, Inc.?
4 MR. STONEROCK: Objection, misstates his
5 testimony.
6 You can answer if you know, Sean.
7 THE WITNESS: Yeah. I mean, I -- I guess I'm
8 failing to see how it's relevant to this. But,
9 yes, a monthly --
10 BY MR. PHILLIPS:
11 Q Okay.
12 A -- fee, retainer.
13 Q Okay. Of which this -- this work was part of
14 the work done towards that retainer; right?
15 A Correct. Among -- among others, yes.
16 Q Okay. So this -- this -- these 24 ads weren't
17 produced out of the kindness of American Made Media
18 Holding's heart?
19 MR. STONEROCK: Objection, vague and ambiguous
20 as to out of the kindness of their heart.
21 You can answer, Sean, if you know.
22 THE WITNESS: Can you say that again, sir? I
23 apologize.
24 MR. PHILLIPS: Let's just move on to number 9.
25 I'll withdraw the question.

Page 56

1 (Playing video:)
2 TONY RANKIN: I'm an Army vet, I was homeless,
3 I was sleeping in my car, and didn't have any hope
4 for a long time.
5 VOICEOVER: Then Tony Rankin was offered a
6 second chance. President Trump's opportunity zones
7 gave new investments to neglected communities,
8 and jobs are coming back.
9 TONY RANKIN: Life is good now. Life is worth
10 living. The president does want to help people
11 like myself to be lifted back up in these
12 low-income communities.
13 DONALD J. TRUMP: I'm Donald J. Trump and I
14 approve this message.
15 (End of video.)
16 (Respondent's Exhibit 9 was identified and
17 later marked for identification.)
18 BY MR. PHILLIPS:
19 Q That screen right there where you see Donald
20 Trump, D. J. Trump, with some legislation or executive
21 order or some document, do you know what that is?
22 A No, sir.
23 Q Okay.
24 A What the document itself is or --
25 Q Correct.

Page 57

1 A -- the location?
 2 Or I know -- I do not know the document, no.
 3 Q I think we all know the location.
 4 Do you know who the people are in that
 5 picture?
 6 A No, sir.
 7 Q Did Omarosa Manigault Newman ever say or can
 8 you -- can you point -- point to a statement where she
 9 said that the Congress or Donald Trump did not invest
 10 in neglected communities?
 11 MR. STONEROCK: Objection, calls for
 12 speculation, lacks foundation.
 13 You can answer, Sean, if you know.
 14 THE WITNESS: No, sir, not an individual
 15 statement.
 16 MR. STONEROCK: John, when we're at a good
 17 breaking point -- I mean, maybe it's not -- maybe
 18 you're not there yet, but can you just let me know?
 19 MR. PHILLIPS: I mean, I've got 14 -- 13 more
 20 videos to go, so it's whenever . . .
 21 MR. STONEROCK: I just -- are you done asking
 22 questions about that video?
 23 MR. PHILLIPS: Yeah, that video.
 24 MR. STONEROCK: Okay. So can we just take
 25 five minutes?

Page 58

1 MR. PHILLIPS: Sure.
 2 MR. STONEROCK: Thank you.
 3 MR. PHILLIPS: We'll be off the record for
 4 five minutes.
 5 (Break from 11:09 a.m. to 11:16 a.m.)
 6 BY MR. PHILLIPS:
 7 Q Going back to campaign ad number -- I think it
 8 was 9. We were on this screen. Can you see that
 9 screen of Donald Trump holding some legislation or an
 10 executive order?
 11 A Yes, sir.
 12 Q Okay. Do you know if -- do you see Omarosa
 13 pictured there?
 14 A No, sir.
 15 Q Okay. The same -- same event. Do you see
 16 Omarosa pictured there?
 17 A I can't see everybody's face, but . . .
 18 Q Let me play it.
 19 MR. PHILLIPS: And we'll attach this as
 20 Omarosa Manigault Newman's Exhibit 9B so I don't
 21 get off of my numbers. I know that's gonna be
 22 confusing, but it will make sense -- it will make
 23 it better later on.
 24 (Respondent's Exhibit 9B was identified and
 25 later marked for identification.)

Page 59

1 (Playing video:)
 2 DONALD J. TRUMP: So this is Historically
 3 Black Colleges and Universities executive order.
 4 It's very important to all of us. This group has
 5 been fantastic, many of which we were with
 6 yesterday --
 7 UNKNOWN SPEAKER: That's right.
 8 DONALD J. TRUMP: -- and really developed
 9 something very special.
 10 So thank you. Thank you all for being here.
 11 Thank you Mr. Vice President, also, Mike --
 12 MIKE PENCE: Thank you.
 13 DONALD J. TRUMP: -- for being here.
 14 It's a very important moment, and a moment
 15 that means a great deal to me. This month has been
 16 a wonderful opportunity to celebrate
 17 African-American history and to begin working
 18 together to create a better future for African
 19 Americans and universities and colleges
 20 and everything that is African American. Today
 21 we're taking action to help make that future happen
 22 and that future better.
 23 Historically Black Colleges and Universities
 24 are incredibly important institutions woven into
 25 the fabric of our history just about like no other.

Page 60

1 Church is very important --
 2 UNKNOWN SPEAKER: Yes.
 3 DONALD J. TRUMP: -- right? Colleges --
 4 UNKNOWN SPEAKER: We need our churches.
 5 DONALD J. TRUMP -- and universities. Come
 6 here. My -- my defender. He's my defender.
 7 (Laughter.)
 8 Education has the power to uplift. It has the
 9 power to transform. And perhaps most important,
 10 education has the power to create greater equality
 11 and justice in our lives. That's why today I'm
 12 thrilled to be signing an executive order to
 13 recognize the importance of Historically Black
 14 College and Universities. Very important. They
 15 have played such an important role in achieving
 16 progress for African Americans and in our nation's
 17 march for justice.
 18 HBCUs have been, really, pillars of the
 19 African-American community for more than 150 years.
 20 Amazing job. And a grand and enduring symbol of
 21 America at its absolute best. And I congratulate
 22 you all to say that.
 23 UNKNOWN SPEAKERS: Thank you.
 24 DONALD J. TRUMP: With this executive order we
 25 will make HBCUs a priority of the Whitehouse, an

Page 61

1 absolute priority.

2 UNKNOWN SPEAKER: I'm right there.

3 UNKNOWN SPEAKER: Yes.

4 UNKNOWN SPEAKER: That's right.

5 UNKNOWN SPEAKER: Yeah.

6 (Applause.)

7 DONALD J. TRUMP: A lot of people are going to

8 be angry that they're not a priority, but that's

9 okay.

10 (Laughter.)

11 And we will pledge our support to you, your

12 mission, and our shared mission of bringing

13 education and opportunity to all of our people.

14 And so I just want to congratulate. These are

15 very, very special people surrounding me. You've

16 done an amazing job. It's not easy.

17 UNKNOWN SPEAKER: No.

18 DONALD J. TRUMP: Nothing's easy.

19 UNKNOWN SPEAKER: No, it isn't.

20 DONALD J. TRUMP: You've done an amazing job.

21 And I just want to congratulate you all.

22 UNKNOWN SPEAKERS: Thank you.

23 DONALD J. TRUMP: And I want to thank you --

24 UNKNOWN SPEAKERS: Thank you very much.

25 DONALD J. TRUMP: -- on behalf of our country.

Page 62

1 UNKNOWN SPEAKERS: Thank you.

2 UNKNOWN SPEAKER: We thank you.

3 DONALD J. TRUMP: And I'm gonna sign this.

4 And this is really fantastic.

5 UNKNOWN SPEAKER: There it is.

6 (Applause.)

7 UNKNOWN SPEAKER: All right.

8 UNKNOWN SPEAKER: Thank you.

9 UNKNOWN SPEAKER: Yes.

10 (End of video.)

11 BY MR. PHILLIPS:

12 Q Go back for a second. I believe the gentleman

13 on the right is Jacksonville's own Nat Glover, former

14 sheriff. And I'm pretty certain right behind him is

15 Omarosa Manigault Newman.

16 So if Omarosa Manigault Newman was at that

17 event, would you -- would you agree with me that that

18 was probably -- that -- that -- portions of that

19 commercial which we're referring to, commercial number

20 9, were while Omarosa Manigault Newman was still

21 employed by the Whitehouse?

22 MR. STONEROCK: Calls for speculation, lacks

23 foundation.

24 You can answer if you know, Sean.

25 THE WITNESS: I do not know her employment at

Page 63

1 this moment in this video.

2 BY MR. PHILLIPS:

3 Q Okay. Do you agree with me that that's her?

4 A I cannot see . . .

5 Q Let me ask her.

6 MR. PHILLIPS: Ms. Manigault Newman, can you

7 hear me?

8 MS. MANIGAULT NEWMAN: Yes, I can hear you.

9 MR. PHILLIPS: Is that -- is that you behind

10 Mr. Glover?

11 MS. MANIGAULT NEWMAN: Yes, that's me. And my

12 husband is also behind Mr. Glover, John Allen

13 Newman.

14 MR. PHILLIPS: Oh, I -- I see John Newman.

15 Okay. Thank you.

16 BY MR. PHILLIPS:

17 Q Do you know who wrote Donald Trump's very

18 words that he read that day?

19 MR. STONEROCK: Calls for speculation, lacks

20 foundation.

21 THE WITNESS: No, sir. This is not a campaign

22 event, so I'm unaware.

23 BY MR. PHILLIPS:

24 Q Okay. Would you be surprised to learn that

25 Omarosa Manigault Newman actually wrote the words that

Page 64

1 Donald Trump spoke that day that were then featured in

2 a commercial used to, I guess -- as an antidefamation

3 campaign? Does that sound like --

4 MR. STONEROCK: Calls for speculation, lacks

5 foundation, vague as to antidefamation campaign.

6 Sean, you can answer if you understand the

7 question.

8 THE WITNESS: I would think it's to promote

9 the legislation.

10 BY MR. PHILLIPS:

11 Q Right. Okay. So what was the purpose of

12 commercial number 9?

13 A Was that the one we were currently on?

14 Q Yeah. The -- the -- not the -- not the -- the

15 clip from the actual bill signing, but this Tony Rankin

16 commercial. I'll -- I'll play it again.

17 A Okay.

18 (Playing video:)

19 TONY RANKIN: I'm an Army vet, I was homeless,

20 I was sleeping in my car, and didn't have any hope

21 for a long time.

22 VOICEOVER: Then Tony Rankin was offered a

23 second chance. President Trump's opportunity zones

24 gave new investments to neglected communities,

25 and jobs are coming back.

Page 65

1 TONY RANKIN: Life is good now. Life is worth
 2 living. The president does want to help people
 3 like myself to be lifted back up in these
 4 low-income communities.
 5 DONALD J. TRUMP: I'm Donald J. Trump and I
 6 approve this message.
 7 (End of video.)
 8 BY MR. PHILLIPS:
 9 Q Did that commercial have anything to do with
 10 Historically Black Colleges and Universities or that
 11 legislation -- that executive order related to HBCUs?
 12 A It --
 13 MR. STONEROCK: Vague as to anything to do
 14 with.
 15 Sorry, Sean. You can answer.
 16 THE WITNESS: No, you can go ahead.
 17 MR. STONEROCK: Calls for speculation --
 18 THE WITNESS: Go for it.
 19 MR. STONEROCK: Calls for speculation, lacks
 20 foundation.
 21 Sorry. Sean, you can answer now.
 22 THE WITNESS: It did not sound like it, sir.
 23 BY MR. PHILLIPS:
 24 Q Isn't it -- I mean, again, we're dealing with
 25 opinions here, but these -- these commercials were all

Page 66

1 to show, I guess, Donald Trump wasn't racist or
 2 counteract messaging by Omarosa that he was racist;
 3 correct?
 4 A Yeah, I think these commercials did what you
 5 said. But also to show the legislation that the
 6 president was promoting, but also -- yeah, I think
 7 that's it.
 8 Q Well, including promoting -- legislation he
 9 was promoting while Omarosa Manigault Newman worked
 10 with him.
 11 MR. STONEROCK: Objection, vague
 12 and ambiguous, misstates the videos, misstates the
 13 witness's testimony.
 14 You can answer, Sean.
 15 THE WITNESS: I'm not too sure on the entire
 16 time frame of when Omarosa worked with the
 17 president at the Whitehouse.
 18 BY MR. PHILLIPS:
 19 Q I -- we're only nine through, but why was it
 20 so important -- I mean, I feel like we've got a lot
 21 of -- out of nine, one, two, three, four, five -- five
 22 or six that feature incarcerated African Americans or
 23 formerly incarcerated African Americans. Is that
 24 racist?
 25 A I think the legislation that incarcerated them

Page 67

1 was disproportionately affecting that community, so,
 2 yes, I believe that there was some basis of racism
 3 prior to President Trump being in office.
 4 Q Right. But the commercials themselves
 5 targeting African Americans who were involved with the
 6 criminal process, isn't that, I mean,
 7 disproportionately characterizing African Americans as
 8 criminals?
 9 A I don't believe so. I think it -- it's -- the
 10 legislation, like I said before, has disproportionately
 11 targeted African Americans, and that the community has
 12 felt the effects of that legislation. And what we were
 13 trying to do was promote the legislation that President
 14 Trump was trying to get past or sign that would help
 15 other communities that were affected by that
 16 disproportion.
 17 Q Were there other pieces of legislation to
 18 choose from besides the First Step Act that -- that --
 19 that Donald Trump, I guess, enacted, to use your words,
 20 that -- that affected or helped African Americans?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, misstates his testimony.
 23 You can answer, Sean, if you know.
 24 THE WITNESS: Was there other legislation that
 25 would help the African-American community?

Page 68

1 BY MR. PHILLIPS:
 2 Q Yes.
 3 A Oh. Permanently funding HBCUs, I believe that
 4 is primarily the African-American community.
 5 Q Okay.
 6 A Low-income areas that were affected, again,
 7 disproportionately would help the community. So, yes,
 8 I -- I believe there's other legislation besides just
 9 the First Step Act.
 10 Q Do you know what percentage of increase or
 11 decrease Donald Trump got between the 2016 campaign
 12 and the 2020 campaign of African-American vote?
 13 MR. STONEROCK: Calls for speculation, lacks
 14 foundation.
 15 You can answer if you know, Sean.
 16 THE WITNESS: No, sir. That was not part of
 17 my role.
 18 BY MR. PHILLIPS:
 19 Q Okay. So do you know if these -- these
 20 commercials were successful at all?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, vague as to the term "successful."
 23 You can answer, Sean.
 24 THE WITNESS: The -- again, I was not involved
 25 in polling, so I am -- I am unsure on the effect of

Page 69

1 the commercials.

2 BY MR. PHILLIPS:

3 Q Okay. Very good. We'll move on to

4 Plaintiff's -- Defendant's 10.

5 A And I apologize, I have a trash dumpster being

6 dumped outside, so it might get a little loud.

7 Q Okay. I can't hear it. But let me know if --

8 A Okay.

9 Q -- if you need to take a break.

10 (Playing video:)

11 JESSE JACKSON: Donald Trump for a few minutes

12 challenges and opportunities to embrace the

13 underserved communities. And beyond that, in terms

14 of reaching out and being inclusive, he's done

15 that, too. He came to our business meeting here in

16 New York because he has this sense of the curious

17 and a will to risk to make things better.

18 (End of video.)

19 (Respondent's Exhibit 10 was identified and

20 later marked for identification.)

21 BY MR. PHILLIPS:

22 Q Do you know where campaign ad 10 aired?

23 A No, sir.

24 Q Okay. Did Jesse Jackson endorse Donald Trump

25 or Joe Biden in the 2020 election?

Page 70

1 MR. STONEROCK: Calls for speculation, lacks

2 foundation.

3 You can answer if you know, Sean.

4 THE WITNESS: I don't know.

5 BY MR. PHILLIPS:

6 Q You don't know?

7 A No.

8 Q Do you know how old that footage was of Jesse

9 Jackson?

10 MR. STONEROCK: Same objection.

11 THE WITNESS: No, sir.

12 BY MR. PHILLIPS:

13 Q Why Jesse Jackson? Do you know who chose --

14 excuse me. Do you know who chose to use old footage of

15 Jesse Jackson in that commercial?

16 A No, sir.

17 Q Do you know Jesse Jackson's current opinion on

18 whether or not he believes Donald Trump is a racist?

19 MR. STONEROCK: Calls for speculation, lacks

20 foundation.

21 You can answer it, Sean.

22 THE WITNESS: No, sir.

23 BY MR. PHILLIPS:

24 Q Do you know of any comments Omarosa Manigault

25 Newman made about Jesse Jackson or Mohammed Ali or

Page 71

1 Jennifer Hudson or -- or any other comments on old

2 video of Donald Trump and African-American leaders in

3 this country?

4 MR. STONEROCK: Objection, compound, calls for

5 speculation, lacks foundation.

6 You can answer if you understand the question,

7 Sean.

8 THE WITNESS: No, sir, not to my knowledge.

9 BY MR. PHILLIPS:

10 Q Okay. Fair enough.

11 Campaign ad 11.

12 (Playing video:)

13 DONALD J. TRUMP: Pro family, pro growth, and

14 100 percent pro American.

15 (End of video.)

16 (Respondent's Exhibit 11 was identified and

17 later marked for identification.)

18 BY MR. PHILLIPS:

19 Q Do you know whether -- referring particularly

20 to campaign ad number 11, do you know whether any of

21 those African Americans featured in that ad were paid,

22 compensated?

23 A Not to my knowledge, sir.

24 Q Okay. Are you aware of whether or not Donald

25 J. Trump for President, Inc. paid minorities to either

Page 72

1 stand behind him at speeches or in commercials, appear

2 in commercials?

3 A No, sir, not to my knowledge.

4 Q Do you know one way or the other?

5 A The -- I think you said two questions there at

6 once.

7 Q Yes. Certainly. I'll break it up.

8 Do you know whether the campaign or its agents

9 or affiliates ever paid African Americans --

10 compensated African Americans to stand behind Trump at

11 campaign events?

12 A No, sir.

13 Q You don't know?

14 A No, I am -- I am not aware of any payments to

15 African Americans to stand behind President Trump at --

16 Q Are you -- are you aware of whether any

17 minorities were compensated to appear in television ads

18 or -- or Internet ads for Donald Trump?

19 A I would believe that using footage of someone

20 else, we would by law have to pay that person for the

21 individual footage. They cannot just give it to the

22 campaign. So that would be yes to that question.

23 Q Okay. Do you know if Jesse Jackson was

24 compensated for the archival footage of him?

25 A No, sir.

Page 73

1 Q That would be Exhibit 11. Moving on to
 2 Exhibit 12.
 3 (Playing video:)
 4 DONALD J. TRUMP: Look around at all those
 5 empty plants where people have moved down and
 6 companies have moved down.
 7 (End of video.)
 8 (Respondent's Exhibit 12 was identified and
 9 later marked for identification.)
 10 BY MR. PHILLIPS:
 11 Q A 10-second elongated ad, do you know where
 12 those would have aired or been used?
 13 A Either -- it -- it looks like it would have
 14 been an Instagram or a Snapchat. Some digital
 15 platform -- right -- social.
 16 Q Something on a phone probably.
 17 A Correct.
 18 Q Okay. 13.
 19 (Playing video:)
 20 (Music playing with video, no dialogue.)
 21 (End of video.)
 22 (Respondent's Exhibit 13 was identified and
 23 later marked for identification.)
 24 BY MR. PHILLIPS:
 25 Q Do you know who the gentleman is in campaign

Page 74

1 ad 13 with his -- with his thumbs up?
 2 A No, sir.
 3 Q Okay. Do you know if he was compensated?
 4 A No, sir.
 5 Q Do you know if he voted for Donald Trump in
 6 2020?
 7 A No, sir.
 8 Q 14.
 9 (Playing video:)
 10 CORRINE RANKIN: Hey, guys. It's Corrine
 11 Rankin. Black Voices for Trump is launching a
 12 nationwide grassroots army of supporters to ensure
 13 that President Trump is reelected this November,
 14 and we need your help. Go online and sign up for
 15 Black Voices for Trump to become an official member
 16 and to have your voice heard, because together we
 17 are going to keep America great.
 18 (End of video.)
 19 (Respondent's Exhibit 14 was identified and
 20 later marked for identification.)
 21 BY MR. PHILLIPS:
 22 Q Do you know whose decision it was to use #WOKE
 23 in campaign ads?
 24 A No, sir.
 25 Q Okay. Do you know who Corrine Rankin is?

Page 75

1 A I've heard the name, but, no, sir, I'm not
 2 familiar.
 3 Q Was that grassroots support successful?
 4 MR. STONEROCK: Objection, calls for
 5 speculation, lacks foundation, vague and ambiguous
 6 as to successful.
 7 You can answer, Sean, if you understand the
 8 question.
 9 THE WITNESS: I am not confident on whether it
 10 is -- was or wasn't successful, and I don't want to
 11 assume that.
 12 BY MR. PHILLIPS:
 13 Q Okay. I guess what was the goal of the ad we
 14 just watched?
 15 MR. STONEROCK: Calls for speculation, lacks
 16 foundation.
 17 You can answer, Sean.
 18 THE WITNESS: So there's coalitions on a
 19 campaign, and each coalition is responsible for
 20 helping to drive vote for the president. And I
 21 would think that one was for helping to build the
 22 Black Voices coalition, and continue to build that
 23 group to have more vote or more social network
 24 appearances. Like, it -- it -- it's a good way to
 25 push message, so . . .

Page 76

1 BY MR. PHILLIPS:
 2 Q I guess with the ultimate goal of getting
 3 Donald Trump reelected with minority support?
 4 A The --
 5 MR. STONEROCK: Objection, calls for
 6 speculation, and lacks foundation.
 7 You can answer, Sean.
 8 THE WITNESS: I mean, you want the support of
 9 all voters.
 10 BY MR. PHILLIPS:
 11 Q Okay. Well, in 14 ads that -- that were
 12 produced to me for your testimony, and they're all
 13 featuring -- heavily featuring African Americans,
 14 and I'm just -- why?
 15 MR. STONEROCK: Objection, asked and answered.
 16 You -- you can answer again if you would like,
 17 Sean.
 18 THE WITNESS: Okay. I mean, it's -- it's a
 19 coalition. There -- there's a -- it's a -- more of
 20 when you have coalitions you direct the message to
 21 individuals and -- and -- and what's important to
 22 them to help promote and draw vote for the
 23 president.
 24 BY MR. PHILLIPS:
 25 Q Okay. How does this -- what does this have to

Page 77

1 do with Omarosa Manigault Newman?

2 MR. STONEROCK: Objection, asked and answered.

3 You can answer again, Sean.

4 THE WITNESS: Can you rephrase the question?

5 What does what have . . .

6 BY MR. PHILLIPS:

7 Q Yeah. Campaign ad number 14, what does --

8 what does that have to do with, if anything, with

9 Omarosa Manigault Newman?

10 A It's just our -- part of our drive on the

11 coalition to correct a narrative.

12 Q Why are only so far -- I mean, we've got 10

13 more to go. But why are only African Americans

14 featured in ads to correct a narrative about whether

15 Donald Trump's racist?

16 A I didn't --

17 MR. STONEROCK: Calls for speculation, lacks

18 foundation, incomplete hypothetical.

19 You can answer if you know, Sean.

20 THE WITNESS: Now, I didn't create the ads,

21 but my assumption in being -- in being a part of

22 the campaign is you normally would direct ads to

23 the individuals based off of others they associate

24 with. And so when you kind of tailor ads to those

25 individuals, it's just the same as any other

Page 78

1 coalition.

2 BY MR. PHILLIPS:

3 Q So I don't want to misstate your words. Black

4 people only associate with black people?

5 A No, that's not what --

6 MR. STONEROCK: Objection, misstates his

7 testimony, argumentative.

8 You can answer, Sean.

9 THE WITNESS: No, sir, that's not what I'm

10 saying.

11 BY MR. PHILLIPS:

12 Q That's why I want to give you a point to

13 clarify because you just said that --

14 A Yes, I realize. Thank you.

15 Q What -- what did you mean by you -- you

16 focused on people that other people are associated

17 with?

18 A Associated with or -- like, if you said

19 someone is racist -- right -- and then you realize that

20 other individuals actually support the president of the

21 same race as you, you would be more in line.

22 Like, if you were African American and only

23 seeing white people on ads, how does that correct the

24 president and that narrative of being racist?

25 Q But -- I mean -- so I guess it was the

Page 79

1 campaign strategy to use race-driven messages to

2 counteract a racist narrative?

3 MR. STONEROCK: Objection, misstates the

4 testimony, argumentative, vague and ambiguous,

5 lacks foundation, calls for speculation.

6 You can answer, Sean, if you understand.

7 THE WITNESS: And I apologize, John, can

8 you -- not rephrase it, just restate it for me?

9 BY MR. PHILLIPS:

10 Q Yes. Sure. I'm just -- I'm -- I'm -- I

11 imagine -- I'm a -- I'm a white guy. Okay? White

12 people -- a lot of white people don't like racists

13 either; right?

14 MR. STONEROCK: Objection, relevance, calls

15 for speculation, lacks foundation, incomplete

16 hypothetical.

17 You can answer, Sean, if you understand.

18 THE WITNESS: Yeah, I agree.

19 BY MR. PHILLIPS:

20 Q Okay. So why target only African Americans

21 with this campaign?

22 MR. STONEROCK: Objection, misstates his

23 testimony.

24 THE WITNESS: That would -- that would assume

25 that the messaging is only going out to African

Page 80

1 Americans; correct? I mean, like you said, white

2 people also don't like -- or I individually don't

3 like racism. I believe that the majority of white

4 people don't like racism. And it would go to

5 everybody -- right --

6 BY MR. PHILLIPS:

7 Q Okay.

8 A -- not just individuals based on race.

9 Q Do you know how long there's been a narrative

10 that Donald Trump was racist?

11 MR. STONEROCK: Calls for speculation, lacks

12 foundation.

13 THE WITNESS: No, sir.

14 BY MR. PHILLIPS:

15 Q 15, let's move on to 15, which will be Exhibit

16 15.

17 (Playing video:)

18 PARIS DENNARD: Hey, this is Paris Dennard.

19 Black Voices for Trump is building a grassroots

20 coalition of leaders from all across the country,

21 and we need your help. We need you to sign up

22 today to join Black Voices for Trump so you can

23 help us ensure that President Trump is reelected in

24 November. Let your voice be heard. Sign up today.

25 Let's do it together.

Page 81

1 (End of video.)

2 (Respondent's Exhibit 15 was identified and

3 later marked for identification.)

4 BY MR. PHILLIPS:

5 Q Are you familiar with Mr. Dennard?

6 A No, sir.

7 Q Okay. I think starting with campaign ad 16,

8 which will be Defendant's 16, we get into the sexism

9 issues. Let me see if I'm right. This will be

10 Defendant's 16.

11 (Playing video:)

12 DR. GINA LOUDON: Hey, it's Dr. Gina Loudon

13 with Women for Trump. We need your support now

14 more than ever to help President Donald Trump win

15 reelection this November and to continue fighting

16 for the issues that matter most to us, to women.

17 Click below to sign up to join the movement. Let

18 your voice be heard.

19 (End of video.)

20 (Respondent's Exhibit 16 was identified and

21 later marked for identification.)

22 BY MR. PHILLIPS:

23 Q So tell me about -- tell me about -- do you

24 know where that ad was aired?

25 A It looks like a digital ad.

Page 82

1 Q Okay. And why -- why was that ad aired?

2 A Dr. Loudon is on -- on Fox a lot. I think

3 she's a well-known person. So trying to build a

4 coalition of women for Trump.

5 Q And why is that in any way relevant to Omarosa

6 Manigault Newman?

7 A Because of her public statements of saying

8 that the president is sexist.

9 Q Okay. Let's go to a different video, which

10 we'll label as 16B. Are you familiar with the Access

11 Hollywood tape?

12 A Yes, sir.

13 Q What happened there?

14 MR. STONEROCK: Objection, vague

15 and ambiguous, calls for speculation, lacks

16 foundation.

17 You can answer if you understand the question,

18 Sean.

19 THE WITNESS: There was recordings that were

20 given to the news networks.

21 BY MR. PHILLIPS:

22 Q Why did that -- why is that significant?

23 MR. STONEROCK: Objection, vague as to

24 significant.

25 You can answer if you know, Sean.

Page 83

1 THE WITNESS: Because it was during a 2016

2 presidential election.

3 BY MR. PHILLIPS:

4 Q Okay.

5 (Playing video:)

6 BILLY BUSH: She used to be great. But she's

7 still very beautiful.

8 DONALD J. TRUMP: I moved on her, actually.

9 You know, she was down in Palm Beach. I moved on

10 her, and I failed. I'll admit it.

11 BILLY BUSH: Whoa.

12 DONALD J. TRUMP: I did try and f*** her. She

13 was married.

14 BILLY BUSH: (Inaudible.)

15 DONALD J. TRUMP: Oh, no, Nancy.

16 UNKNOWN SPEAKER: Yeah.

17 DONALD J. TRUMP: No, this was (Inaudible.)

18 And I moved on her very heavily. In fact, I took

19 her out furniture shopping. She wanted to get some

20 furniture. I said: I'll show you where they have

21 some nice furniture. I took her out for furniture.

22 I moved on her like a bitch, but I couldn't get

23 there. And she was married. And all of a sudden I

24 see her, and she's now got the big phony **** and

25 everything. She's totally changed her look.

Page 84

1 BILLY BUSH: She's your girl's ****. Hottie,

2 in the purple.

3 DONALD J. TRUMP: Whoa.

4 UNKNOWN SPEAKER: Whoa.

5 BILLY BUSH: Yes.

6 DONALD J. TRUMP: Whoa.

7 BILLY BUSH: Yes, The Donald is good.

8 DONALD J. TRUMP: Whoa.

9 BILLY BUSH: Oh, my man.

10 UNKNOWN SPEAKER: Yes.

11 BILLY BUSH: Wait, wait. You've got to look

12 at me when you get out there.

13 UNKNOWN SPEAKER: Who sets this up?

14 BILLY BUSH: You give me the thumbs up.

15 DONALD J. TRUMP: You are a ****.

16 BILLY BUSH: Give me the thumbs up. You've

17 got to give the thumbs up.

18 UNKNOWN SPEAKER: You can't be too happy, man.

19 UNKNOWN SPEAKER: You've got to give the

20 thumbs up.

21 DONALD J. TRUMP: Yeah, you and I will walk

22 out.

23 UNKNOWN SPEAKER: Oh, my God, is she hot.

24 DONALD J. TRUMP: Maybe it's a different one.

25 BILLY BUSH: It better not be the publicist.

<p style="text-align: right;">Page 85</p> <p>1 No, it's -- it's her.</p> <p>2 DONALD J. TRUMP: Yeah, that's her, with the</p> <p>3 gold.</p> <p>4 I'm gonna use some tic tacs just in case I</p> <p>5 start kissing her. You know, I'm automatically</p> <p>6 attracted to beautiful women. I just start kissing</p> <p>7 them. It's like a magnet, kiss, kiss. I don't</p> <p>8 even wait. And when you're a star, they let you do</p> <p>9 it. You can do anything.</p> <p>10 BILLY BUSH: You can do whatever you want.</p> <p>11 DONALD J. TRUMP: You grab them by the ****.</p> <p>12 You can do anything.</p> <p>13 BILLY BUSH: Look at those legs. All I can</p> <p>14 see is the legs.</p> <p>15 DONALD J. TRUMP: No, it looks good.</p> <p>16 BILLY BUSH: Come on, shorty --</p> <p>17 DONALD J. TRUMP: Oh, nice legs, huh?</p> <p>18 BILLY BUSH: -- oof, get out of the way.</p> <p>19 There's some good legs.</p> <p>20 Go ahead.</p> <p>21 DONALD J. TRUMP: It's always good if you</p> <p>22 don't fall out of the bus like Ford, Gerald Ford.</p> <p>23 Remember?</p> <p>24 BILLY BUSH: Down below. Down below. Pull</p> <p>25 the handle.</p>	<p style="text-align: right;">Page 87</p> <p>1 DONALD J. TRUMP: Come on.</p> <p>2 BILLY BUSH: Well, you've got a nice costar</p> <p>3 here.</p> <p>4 DONALD J. TRUMP: Good.</p> <p>5 ARIANNA: Yes. Absolutely.</p> <p>6 DONALD J. TRUMP: After you.</p> <p>7 ARIANNA: All right. I think we're gonna</p> <p>8 sneak on this way, through Jay Leno.</p> <p>9 DONALD J. TRUMP: Okay.</p> <p>10 BILLY BUSH: Arianna, are there any -- any</p> <p>11 love scenes or anything in the show?</p> <p>12 ARIANNA: Today there's a lot of begging from</p> <p>13 me.</p> <p>14 BILLY BUSH: Really?</p> <p>15 ARIANNA: Yes.</p> <p>16 BILLY BUSH: You're gonna beg him for</p> <p>17 attention, for an apprenticeship, or --</p> <p>18 ARIANNA: To get married.</p> <p>19 BILLY BUSH: To get married.</p> <p>20 DONALD J. TRUMP: Ah, that's what it is.</p> <p>21 BILLY BUSH: Oh, no.</p> <p>22 ARIANNA: How do you feel about that?</p> <p>23 DONALD J. TRUMP: That's okay. I have to look</p> <p>24 at a script.</p> <p>25 ARIANNA: Yes. Oh.</p>
<p style="text-align: right;">Page 86</p> <p>1 DONALD J. TRUMP: Hello. How are you? Hi.</p> <p>2 ARIANNA: Hi, Mr. Trump. How are you?</p> <p>3 DONALD J. TRUMP: Good seeing you. Terrific.</p> <p>4 ARIANNA: Good to see you, too.</p> <p>5 DONALD J. TRUMP: Terrific. You know Billy</p> <p>6 Bush.</p> <p>7 ARIANNA: How are you?</p> <p>8 BILLY BUSH: Nice to see you. How are you</p> <p>9 doing, Arianne?</p> <p>10 ARIANNA: I'm doing very well. Thank you.</p> <p>11 Are you ready to be a soap star?</p> <p>12 DONALD J. TRUMP: We're ready. Let's go.</p> <p>13 ARIANNA: All right.</p> <p>14 DONALD J. TRUMP: Make me a soap star.</p> <p>15 ARIANNA: All right.</p> <p>16 BILLY BUSH: How about a little hug for The</p> <p>17 Donald? He just got off the bus.</p> <p>18 ARIANNA: Would you like a little hug,</p> <p>19 darling?</p> <p>20 DONALD J. BUSH: Oh, yes. Absolutely.</p> <p>21 Melania said this was okay.</p> <p>22 BILLY BUSH: How about a hug for Bushy? I</p> <p>23 just got off the bus.</p> <p>24 ARIANNA: Oh, Bushy, Bushy.</p> <p>25 BILLY BUSH: There we go. Excellent.</p>	<p style="text-align: right;">Page 88</p> <p>1 DONALD J. TRUMP: Have you studied this</p> <p>2 script?</p> <p>3 ARIANNA: Well, luckily, I have -- actually,</p> <p>4 we're going to continue going this way.</p> <p>5 DONALD J. TRUMP: Do you have a script for me?</p> <p>6 ARIANNA: I've got a script for you.</p> <p>7 DONALD J. TRUMP: Okay. Good.</p> <p>8 ARIANNA: And, luckily, I do all the talking.</p> <p>9 So --</p> <p>10 DONALD J. TRUMP: Oh, good.</p> <p>11 ARIANNA: -- you just stand there and look</p> <p>12 handsome and you'll be good.</p> <p>13 DONALD J. TRUMP: Well, that's good.</p> <p>14 (End of video.)</p> <p>15 (Respondent's Exhibit 16B was identified and</p> <p>16 later marked for identification.)</p> <p>17 BY MR. PHILLIPS:</p> <p>18 Q We'll cut that off at 249.</p> <p>19 Were these comments of -- I mean, would it --</p> <p>20 going back to what's fact and what's opinion. Someone</p> <p>21 saying "I moved on her like a bitch," is -- is that</p> <p>22 sexist?</p> <p>23 MR. STONEROCK: Objection, incomplete</p> <p>24 hypothetical, calls for speculation, calls for a</p> <p>25 legal conclusion.</p>

Page 89

1 You can answer, Sean, if you have an opinion.
 2 THE WITNESS: I actually don't have an opinion
 3 on it. I don't -- I don't believe it is. But I
 4 also -- yeah, I don't believe it is.
 5 BY MR. PHILLIPS:
 6 Q When you're a star you can do anything, grab
 7 them by the pussy. A comment like that, is that
 8 sexist?
 9 MR. STONEROCK: Objection, calls for
 10 speculation, lacks foundation, incomplete
 11 hypothetical, calls for a legal conclusion.
 12 You can answer it, Sean, if you have an
 13 opinion on it.
 14 THE WITNESS: I don't have an opinion.
 15 BY MR. PHILLIPS:
 16 Q Okay. And what did Omarosa say that was --
 17 that -- that attributed Donald Trump to being sexist?
 18 MR. STONEROCK: Objection, calls for
 19 speculation, lacks foundation.
 20 Sean, you can -- you can testify to statements
 21 you recall off the top of your head. Obviously
 22 there's hundreds of them at issue in the case.
 23 THE WITNESS: I have -- I have no statements
 24 off the top of my head. But there are -- there are
 25 multiple occasions.

Page 90

1 BY MR. PHILLIPS:
 2 Q Okay. And is it a matter of fact that Donald
 3 Trump's not sexist, or is that opinion?
 4 MR. STONEROCK: Objection, calls for a legal
 5 conclusion, vague and ambiguous.
 6 You can answer if you understand the question,
 7 Sean.
 8 THE WITNESS: No, I don't. I think that -- of
 9 what you -- can you rephrase it?
 10 BY MR. PHILLIPS:
 11 Q Yeah.
 12 A I couldn't figure it out.
 13 Q So part of this campaign was -- and, I guess,
 14 part of the reason that -- that Omarosa is being sued
 15 by the campaign is because she said or insinuated or
 16 gave examples of Don -- Donald Trump being what you --
 17 you said was sexist. And what I'm -- what I'm
 18 wondering is, is -- well, let me back it up, then.
 19 What is -- what is sexist? What does that
 20 mean?
 21 A I think it was the same line of racism except
 22 for it goes with someone's gender.
 23 Q Well, race and -- race and sex and gender are
 24 two separate things. So what is -- help me understand
 25 your definition of sexism, please.

Page 91

1 A I would say -- I don't know how to say it the
 2 best way, but not hating but probably -- yeah, probably
 3 hating someone else based off of their gender.
 4 Q Hating someone else?
 5 A It's a strong word. I think it's -- it could
 6 be multiple things. But basing it on the opinion of
 7 gender.
 8 Q Okay. Are we allowed in this country to grab
 9 a woman by the private parts --
 10 MR. STONEROCK: Objection, incomplete
 11 hypothetical --
 12 BY MR. PHILLIPS:
 13 Q -- without consent?
 14 MR. STONEROCK: Objection, incomplete
 15 hypothetical, calls for a legal conclusion, calls
 16 for speculation, lacks foundation.
 17 I'm gonna instruct the witness not to answer
 18 the question.
 19 MR. PHILLIPS: Okay.
 20 BY MR. PHILLIPS:
 21 Q Let's go to another video, which we'll label
 22 16C.
 23 (Playing video:)
 24 HOWARD STERN: Donald, do you ever discuss sex
 25 with your daughter?

Page 92

1 DONALD J. TRUMP: No.
 2 HOWARD STERN: You do not?
 3 DONALD J. TRUMP: No.
 4 HOWARD STERN: You've never sat her down --
 5 IVANKA TRUMP: And I have a feeling we're not
 6 going to here.
 7 VOICEOVER: Another embarrassing video from a
 8 2006 Howard Stern show has surfaced. It shows
 9 Trump, alongside daughter, Ivanka, and son, Don,
 10 Jr., joking about being a sexual predator.
 11 HOWARD STERN: You know about sexual predators
 12 and things like that.
 13 UNKNOWN SPEAKER: Right.
 14 HOWARD STERN: I mean --
 15 ROBIN QUIVERS: You are one.
 16 HOWARD STERN: All right. I wasn't going to
 17 say that. But it's true.
 18 (End of video.)
 19 (Respondent's Exhibit 16C was identified and
 20 later marked for identification.)
 21 BY MR. PHILLIPS:
 22 Q Is -- and I realize Howard Stern's a comedy
 23 show, but is -- in today's society, is laughing about
 24 being called a sexual predator appropriate?
 25 MR. STONEROCK: Objection, incomplete

Page 93

1 hypothetical, misstates the video, calls for
 2 speculation, lacks foundation, vague and ambiguous
 3 as to the term "appropriate."
 4 You can answer if you understand the question,
 5 Sean.
 6 THE WITNESS: I believe that in context of
 7 that I would say it's probably because it is a
 8 comedy show. And it was a long time ago. During
 9 those times, I don't think it was frowned upon as
 10 it is today.
 11 BY MR. PHILLIPS:
 12 Q Okay. We'll go on to 16D.
 13 (Playing video:)
 14 DONALD J. TRUMP: My daughter is beautiful,
 15 Ivanka. She -- she --
 16 HOWARD STERN: By the way, your daughter --
 17 DONALD J. TRUMP: She's beautiful.
 18 HOWARD STERN: -- is a piece -- can I say
 19 this? A piece of ass.
 20 DONALD J. TRUMP: Yeah.
 21 The last couple years I'd go out with
 22 somebody, and she's, like, 21, and she's talking
 23 about, you know, what are you doing, and she's
 24 studying algebra and --
 25 HOWARD STERN: So what?

Page 94

1 DONALD J. TRUMP: And it's, like -- it was
 2 always embarrassing for me to walk in. It's too
 3 young. 30 is like a perfect age.
 4 HOWARD STERN: Absolutely. She has enough
 5 life experience.
 6 ARTIE LANGE: Until she's 35.
 7 HOWARD STERN: Yeah.
 8 (Laughter.)
 9 ROBIN QUIVERS: Don't ever change.
 10 HOWARD STERN: Too much life experience.
 11 DONALD J. TRUMP: What is it at 35, Howard?
 12 It's called checkout time.
 13 HOWARD STERN: And you're probably, I would
 14 say, the greatest judge of beauty on this planet.
 15 In fact, I would create a TV show for you where all
 16 you did was just judge women.
 17 DONALD J. TRUMP: Now, that may be the best
 18 idea of all.
 19 HOWARD STERN: It's a simple thing. It's a
 20 half hour, and we strip it out all over the
 21 country.
 22 DONALD J. TRUMP: No, I would say I'm the
 23 all-time judge.
 24 HOWARD STERN: You own this pageant. You go
 25 over, you look, you're meeting the girls. One of

Page 95

1 them comes up to you and says: Mr. Trump, you're a
 2 very sexy man.
 3 DONALD J. TRUMP: You're a beautiful man. You
 4 have fantastic hair.
 5 HOWARD STERN: Well, you're a powerful man.
 6 Right? Right?
 7 DONALD J. TRUMP: Right.
 8 HOWARD STERN: You're a powerful man.
 9 DONALD J. TRUMP: Right.
 10 HOWARD STERN: I want to sleep with you. Now,
 11 you're not the type that would say no.
 12 DONALD J. TRUMP: I -- I don't want to hurt
 13 their feelings.
 14 HOWARD STERN: Right. No.
 15 DONALD J. TRUMP: Right.
 16 HOWARD STERN: But, I mean, you see a
 17 beautiful woman --
 18 DONALD J. TRUMP: Right.
 19 HOWARD STERN: -- you want to -- you want to
 20 have that. You're a guy that likes to have
 21 everything. Right?
 22 ROBIN QUIVERS: Well, couldn't that be
 23 construed, however, as um . . .
 24 HOWARD STERN: Conflict?
 25 ROBIN QUIVERS: Yes.

Page 96

1 HOWARD STERN: I don't -- I don't see it as a
 2 conflict.
 3 DONALD J. TRUMP: Well, it could be a conflict
 4 of interest. But, you know, it's the kind of thing
 5 you worry about later.
 6 ROBIN QUIVERS: Oh, I see.
 7 DONALD J. TRUMP: You tend to think about the
 8 conflict a little bit later on.
 9 ARTIE LANGE: The question is how could it not
 10 be construed?
 11 HOWARD STERN: No. I mean -- I mean, some of
 12 these foreign girls, you know: Mr. Trump, in my
 13 country we say hello with the vagina. And then --
 14 DONALD J. TRUMP: Well, you could also say:
 15 As the owner of the pageant, it's your obligation
 16 to do that.
 17 HOWARD STERN: So -- so you have done that.
 18 Now, tell me --
 19 DONALD J. TRUMP: Well, I'll tell you the
 20 funniest is that I'll go backstage before a show.
 21 HOWARD STERN: Yes.
 22 DONALD J. TRUMP: And everyone's getting
 23 dressed and ready and everything else. And, you
 24 know, no men are anywhere. And I'm allowed to go
 25 in because I'm the owner of the pageant, and

Page 97

1 therefore I'm inspecting it. You know, I'm
 2 inspecting --

3 ROBIN QUIVERS: Right, right.

4 DONALD J. TRUMP: -- and I want to make sure
 5 that everything is good.

6 HOWARD STERN: You're like a doctor. You're
 7 there --

8 DONALD J. TRUMP: And they're dressing. Is
 9 everyone okay? You know, they're standing there
 10 with no clothes. Is everybody okay? And you see
 11 these incredible looking women. And so I sort of
 12 get away with things like that.

13 (End of video.)

14 (Respondent's Exhibit 16D was identified and
 15 later marked for identification.)

16 BY MR. PHILLIPS:

17 Q Is -- you're referring to 16D, the CNN clip.
 18 Is calling a woman a piece of ass sexist?

19 MR. STONEROCK: Objection, calls for
 20 speculation, lacks foundation, incomplete
 21 hypothetical.

22 You can answer, Sean, if you have an opinion.

23 THE WITNESS: I don't have an opinion on that.

24 BY MR. PHILLIPS:

25 Q Okay. And we'll go to 16E.

Page 98

1 A Is there a way -- sorry to interrupt you real
 2 quick. Is there a way to see the dates? Because it
 3 looked -- it sounded like multiple different videos all
 4 pulled together as one on that clip.

5 Q That -- that video was procured by CNN, and it
 6 -- it had the dates in it when each clip occurred.

7 A Where were they?

8 Q Okay. Let me go back to that one.

9 A And when -- and when -- when did CNN put these
 10 out, you know?

11 Q Yeah. That's a good question.

12 A Sorry, again, about the noise --

13 Q That's fine.

14 A -- if you can hear it.

15 Q All right. So going back to 16E [sic]. You
 16 can see the CNN logo. And then they have various clips
 17 from the Howard Stern Show, 2002, 2010, 2005, and then
 18 the CNN logo to close. So I believe this came out
 19 during one of the campaigns.

20 Do you dispute that Donald Trump said those
 21 things?

22 MR. STONEROCK: Objection, vague as to said
 23 those things.

24 BY MR. PHILLIPS:

25 Q Yeah. The clips from Donald Trump speaking,

Page 99

1 do you have a reason to dispute that that was him
 2 speaking?

3 A I don't know if it was or wasn't, but I
 4 wouldn't . . .

5 Q Okay.

6 A I don't want to assume. Also, I've never --
 7 the Howard Stern Show is definitely different.

8 Q And we will go to an old clip from The View.
 9 It's fairly short.

10 (Playing video:)

11 SHERRI SHEPHERD: Hey. So, Donald . . .

12 DONALD J. TRUMP: Hmm?

13 SHERRI SHEPHERD: All right. I'm -- I'm
 14 afraid to ask this question, but what would you do
 15 if Playboy put Ivanka on the cover of the magazine
 16 and she had not --

17 IVANKA TRUMP: This is going to be an
 18 interesting answer.

19 SHERRI SHEPHERD: Uh-huh. See, he doesn't
 20 even want you to have a drink. I know him,
 21 so . . .

22 DONALD J. TRUMP: It would be really
 23 disappointing. Not really. But it would depend on
 24 what was inside the magazine.

25 SHERRI SHEPHERD: And now, if she posed, it

Page 100

1 would be fine. But if they put her picture on --

2 DONALD J. TRUMP: Yeah. But it depends on
 3 what goes inside the magazine.

4 JOY BEHAR: Well, see, that's her gripe.

5 DONALD J. TRUMP: Right.

6 JOY BEHAR: That's this girl's gripe.

7 DONALD J. TRUMP: And there was nothing.

8 JOY BEHAR: And you assume there will be nude
 9 -- nude photos.

10 DONALD J. TRUMP: Right, you do assume that in
 11 Playboy.

12 ELISABETH HASSELBECK: Misleading.

13 MEREDITH VIEIRA: Okay. But if they were, you
 14 wouldn't have an issue with it, then? If they were
 15 using her to --

16 DONALD J. TRUMP: I don't think Ivanka would
 17 do that inside the magazine, although she does have
 18 a very nice figure. I've said that if Ivanka
 19 weren't my daughter, perhaps I would be dating her,
 20 you know.

21 JOY BEHAR: Stop it. Oh, it's so weird.
 22 Stop it.

23 MEREDITH VIEIRA: You know what, you are --

24 DONALD J. TRUMP: Is that terrible? How
 25 terrible?

Page 101

1 MEREDITH VIEIRA: You're known for saying --

2 DONALD J. TRUMP: Is that terrible?

3 MEREDITH VIEIRA: -- outrageous things,

4 Mr. Trump.

5 JOY BEHAR: Who are you, Woody Allen?

6 (Laughter and applause.)

7 DONALD J. TRUMP: That's good. That's very

8 good.

9 (End of video.)

10 (Respondent's Exhibit 16E was identified and

11 later marked for identification.)

12 BY MR. PHILLIPS:

13 Q I know when we get into Omarosa comments,

14 there's some comments related to things that Omarosa

15 said about the relationship between Donald Trump

16 and Ivanka. And I guess the question is would you

17 agree that there's been a -- someone could have a

18 long-standing opinion that Donald Trump has said things

19 that most fathers probably wouldn't say about their

20 daughters such that: If she wasn't my daughter, I

21 would be dating her?

22 MR. STONEROCK: Objection, incomplete

23 hypothetical, calls for speculation, lacks

24 foundation, vague and ambiguous as to long-standing

25 opinion.

Page 102

1 You can answer if you understand the question,

2 Sean.

3 THE WITNESS: Can you say that again, sir? It

4 sounded more of a statement than a question.

5 BY MR. PHILLIPS:

6 Q Yes. Are you aware that there's been a

7 long-standing narrative that Donald Trump refers to his

8 daughter, Ivanka Trump, in sexual terms?

9 MR. STONEROCK: Vague and ambiguous as to

10 long-standing narrative.

11 You can answer, Sean.

12 THE WITNESS: I'm -- to be honest with you, I

13 was not too familiar with Mr. Trump until the

14 campaign.

15 BY MR. PHILLIPS:

16 Q Okay. And that was 16E.

17 MR. STONEROCK: I think -- John, was that E or

18 -- was that E, the last one you played?

19 MR. PHILLIPS: I believe it was E. I have B

20 as Access Hollywood, C as Inside Edition, D as CNN,

21 and E as View.

22 MR. STONEROCK: Okay.

23 MR. PHILLIPS: We're going to do one more of

24 these, F, which will be Howard Stern. Oh, maybe

25 not. The audio didn't come down on that one.

Page 103

1 So we'll substitute 16F with a different

2 Howard Stern clip. I think that's the CNN clip.

3 Okay. Well, let me stop at D. We'll strike F. I

4 might do that later.

5 BY MR. PHILLIPS:

6 Q And I guess -- I guess my question after those

7 few videos is, is it a fact or an opinion that Donald

8 Trump is sexist?

9 MR. STONEROCK: Objection, calls for a legal

10 conclusion, incomplete hypothetical.

11 You can answer if you have an opinion on that.

12 THE WITNESS: I -- I don't believe that Donald

13 Trump is sexist. I would think that would be

14 opinion based.

15 BY MR. PHILLIPS:

16 Q Okay. Does saying sexist -- do you not feel

17 that any of those comments you just saw were sexist?

18 A I don't -- I don't have an opinion on whether

19 they were or were not sexist.

20 Q Okay. We will go to video 17.

21 MR. STONEROCK: John, before we get into that

22 video, could we take another quick break? I've got

23 to send a quick email on another matter.

24 MR. PHILLIPS: Sure.

25 MR. STONEROCK: Could I have 10 minutes?

Page 104

1 MR. PHILLIPS: Sure.

2 MR. STONEROCK: And we can come back at, say,

3 9 -- 12:20 your time and 9:20 our time?

4 MR. PHILLIPS: Sure.

5 MR. STONEROCK: Okay. Thank you.

6 (Break from 12:09 p.m. to 12:24 p.m.)

7 MR. PHILLIPS: Back on the record at 12:24

8 with Omarosa Manigault Newman's Exhibit 17, another

9 video produced to us.

10 (Playing video:)

11 KATRINA CAMPINS: Hi, everyone. Katrina

12 Campins here. Women for Trump is building a

13 grassroots army of women across the nation who are

14 dedicated to making sure that President Trump is

15 reelected this November, and we need your help.

16 Click below to sign up and let your voice be heard.

17 Together we will keep America great.

18 (End of video.)

19 (Respondent's Exhibit 17 was identified and

20 later marked for identification.)

21 BY MR. PHILLIPS:

22 Q Mr. Dollman, I'm gonna use the terms generally

23 versus specifically for this -- this next question.

24 A Okay.

25 Q Was ad number 17 created specifically because

Page 105

1 of Omarosa Manigault Newman or generally because of
 2 Omarosa Manigault Newman? Or you can reject that
 3 entirely and answer what Omarosa Manigault Newman had
 4 to do with -- with 17.
 5 MR. STONEROCK: Objection, vague and ambiguous
 6 as to generally and specifically.
 7 Sean, you can answer the question.
 8 THE WITNESS: I think it was generally putting
 9 the women coalition together.
 10 BY MR. PHILLIPS:
 11 Q Okay. Would you agree that the women
 12 coalition was needed as a matter of damage control from
 13 tapes like the Access Hollywood tape?
 14 MR. STONEROCK: Objection, incomplete
 15 hypothetical, calls for speculation, lacks
 16 foundation.
 17 You can answer, Sean.
 18 THE WITNESS: I believe every campaign has a
 19 women's coalition.
 20 BY MR. PHILLIPS:
 21 Q Okay. Does every woman's campaign -- I'm
 22 sorry. Does every campaign have a candidate who uses
 23 terms like "moved on her like a bitch" or "grab them by
 24 the pussy"?
 25 MR. STONEROCK: Objection, incomplete

Page 106

1 hypothetical, argumentative.
 2 You can answer it, Sean.
 3 THE WITNESS: I do not know, sir.
 4 (J. Wyndal Gordon, Esquire entered the Zoom
 5 deposition.)
 6 BY MR. PHILLIPS:
 7 Q Okay. Have you ever heard of a political
 8 campaign where the chief -- the chief candidate uses
 9 terms that are made public such as "I moved on her like
 10 a bitch" or "you grab them by the pussy"?
 11 MR. STONEROCK: Objection, compound,
 12 incomplete hypothetical, calls for speculation,
 13 lacks foundation.
 14 You can answer, Sean.
 15 THE WITNESS: I'm unsure, sir.
 16 BY MR. PHILLIPS:
 17 Q Okay. Abraham Lincoln, did -- was he ever
 18 attributed to a quote about moving on women like a
 19 bitch?
 20 MR. STONEROCK: Same objections.
 21 THE WITNESS: I -- I do not know, sir.
 22 BY MR. PHILLIPS:
 23 Q Barack Obama, did he ever talk about grabbing
 24 a woman by the pussy that you're aware of --
 25 MR. STONEROCK: Same objections.

Page 107

1 BY MR. PHILLIPS:
 2 Q -- publicly?
 3 THE WITNESS: Not that I'm aware of.
 4 BY MR. PHILLIPS:
 5 Q Okay. Any candidate in American history joke
 6 about sexual assault or sexual predatory behavior that
 7 you're aware of --
 8 MR. STONEROCK: Objection, calls for
 9 speculation, lacks foundation.
 10 You can answer, Sean.
 11 BY MR. PHILLIPS:
 12 Q -- besides Donald Trump?
 13 THE WITNESS: No, sir.
 14 BY MR. PHILLIPS:
 15 Q Okay. So would you agree that there would be
 16 added emphasis to the need for pro women campaign ads
 17 given the uniqueness of Donald Trump's statements such
 18 as "moving on her like a bitch" and "grab her by the
 19 pussy"?
 20 MR. STONEROCK: Objection, compound,
 21 incomplete hypothetical, calls for speculation,
 22 lacks foundation.
 23 You can answer, Sean.
 24 THE WITNESS: I think depending on the
 25 campaign. I believe every video that you showed

Page 108

1 that you brought were played in 2016 when we had a
 2 women's coalition then, as well, and that probably
 3 was for a lot more of -- directed towards those
 4 videos. 2020, I think it was not those videos, if
 5 that makes sense.
 6 BY MR. PHILLIPS:
 7 Q It doesn't. Explain what you mean, please.
 8 A So the women's coalition was more focused on
 9 continuing to keep women with the president or behind
 10 the president in 2020.
 11 In 2016, those videos that you showed were
 12 played by the news networks and they -- and in 2016,
 13 the women's coalition was more to, I guess, correct the
 14 narrative from the news networks.
 15 Q What was incorrect -- what -- what news
 16 narrative needed correcting related to Donald Trump
 17 and women?
 18 MR. STONEROCK: Vague and ambiguous as to
 19 time.
 20 You can answer, Sean.
 21 THE WITNESS: That he was sexist.
 22 BY MR. PHILLIPS:
 23 Q Okay. So the news networks were also
 24 referring to Donald Trump in terms that were
 25 characterizing him as sexist?

Page 109

1 MR. STONEROCK: Vague as to time.
 2 THE WITNESS: What was that, Ryan? Sorry. I
 3 didn't hear.
 4 BY MR. PHILLIPS:
 5 Q He was just saying vague as to time.
 6 And let me just -- and let me just start over
 7 on time. Going into the 2020 election, is it -- is
 8 it -- we were talking -- so I've got a follow-up to an
 9 answer.
 10 A Uh-huh.
 11 Q So it's -- I believe we were talking about,
 12 going into the 2020 election, that there was a
 13 narrative in the news media that Donald Trump was
 14 sexist. True or untrue?
 15 A I would say that's true.
 16 Q Okay. Was there -- going into the 2020
 17 election, was there a narrative in the media that
 18 Donald Trump was racist?
 19 A I would --
 20 MR. STONEROCK: Calls for speculation, lacks
 21 foundation, incomplete hypothetical.
 22 You can answer it, Sean.
 23 THE WITNESS: I would say there was a
 24 narrative from the news networks.
 25 BY MR. PHILLIPS:

Page 110

1 Q That Donald Trump was racist going into the
 2 2020 election?
 3 A Yes, sir.
 4 Q Okay. So it wasn't just this lone atom out
 5 there, Omarosa Manigault Newman, that was saying Donald
 6 Trump was racist and -- and sexist? There was news --
 7 and, good grief, what I did to my hair. There was --
 8 let me start that over.
 9 It wasn't just this lone atom, Omarosa
 10 Manigault Newman, who was saying Donald Trump was
 11 sexist or racist, there was news coverage additionally;
 12 correct?
 13 MR. STONEROCK: Vague as to time.
 14 You can answer it, Sean.
 15 THE WITNESS: Yes, sir.
 16 BY MR. PHILLIPS:
 17 Q Okay. And that's going into the 2020 election
 18 we were referring to just because of the objection as
 19 to time; is that correct?
 20 A Correct.
 21 I would think that there were the news
 22 networks as well. But Omarosa was a part of -- that
 23 was not a news network publicly saying -- stating those
 24 comments about the president.
 25 Q What was Donald Trump's family -- I mean, what

Page 111

1 was -- what was Mary Trump -- didn't Mary Trump write a
 2 book, too?
 3 MR. STONEROCK: Objection, calls for
 4 speculation, lacks foundation, relevance.
 5 You can answer if you know, Sean.
 6 THE WITNESS: I don't -- I don't know the
 7 question.
 8 BY MR. PHILLIPS:
 9 Q Okay. Who is Mary Trump? Do you know who
 10 Mary Trump is?
 11 A No, sir.
 12 Q Okay. Are you aware that a family member of
 13 Donald Trump's wrote a book indicating that not only he
 14 was racist but his family was racist?
 15 A I do not know the detail of a book.
 16 Q Okay. Are you aware generally --
 17 A That she wrote a book?
 18 Q That she --
 19 A Sorry, I didn't mean to interrupt you.
 20 Q That's okay.
 21 Are you aware that a family member wrote a --
 22 wrote a book about Donald Trump?
 23 A Yes. I believe so, yes.
 24 Q Okay. Are you aware that that family member's
 25 name was Mary Trump?

Page 112

1 A No, sir.
 2 Q Okay. Are you aware that that family member
 3 was a niece of Donald Trump?
 4 A No, sir.
 5 Q Okay. Are you aware that that book written by
 6 that family member alleged that Donald Trump was a
 7 racist?
 8 MR. STONEROCK: Calls for speculation
 9 and lacks foundation.
 10 You can answer if you know, Sean.
 11 THE WITNESS: No, I do not know the context of
 12 the book.
 13 BY MR. PHILLIPS:
 14 Q Okay. We are at -- I think I played 17. I
 15 think we're at 18. So video 18 produced to us by the
 16 campaign last night.
 17 MR. PHILLIPS: Hi, Mr. Gordon, by the way. I
 18 see you've joined us.
 19 (Playing video:)
 20 DANIELLE D'SOUZA GILL: Ladies, we've come a
 21 long way. There is no denying it. We are better
 22 off today than we were just a few years ago when
 23 President Trump was elected. More than 60 percent
 24 of all new jobs under Trump's administration are
 25 going to women. How incredible is that? President

Page 113

1 Trump has turned around the nation for the benefit
 2 of women, young, old, mothers, sisters, wives,
 3 workers, and friends.
 4 News broke just this January that women are
 5 officially a majority of our workforce. Democrats
 6 who rail against the president don't realize how
 7 much support President Trump has from women. This
 8 is because women are just as smart, just as
 9 capable, and just as hard working as everyone else
 10 and can make up their own minds about whether
 11 policies benefit them.
 12 Under President Trump, we are seeing women
 13 succeed with unemployment at an all time low. We
 14 are seeing women rising in their careers. We are
 15 seeing women speaking up for what they believe in.
 16 Women are empowered again, and Trump is making
 17 America great again. Let's support President Trump
 18 together. This is our time.
 19 Text empower to 88022.
 20 (End of video.)
 21 (Respondent's Exhibit 18 was identified and
 22 later marked for identification.)
 23 BY MR. PHILLIPS:
 24 Q I had to go back. So what is womenfortrump20
 25 that's referenced in that ad?

Page 114

1 A Women for Trump 2020? I am unsure. Just the
 2 20, or 2020?
 3 Q I don't know.
 4 I was gonna ask, do you know who Danielle
 5 D'Souza Gill is, and then right as I was about to ask
 6 the question I saw it flash by. So just right there on
 7 the opening graphic it says, "Board member
 8 womenfortrump20." And it looks like an ad, so maybe
 9 it's a -- I mean, it could even be just a Twitter
 10 thing.
 11 But do you know -- let me go back and just
 12 ask, do you know who Danielle D'Souza Gill is?
 13 A No, sir.
 14 Q Do you know what this organization is,
 15 womenfortrump20, or what she's a board member of?
 16 A I would believe the coalition --
 17 Q Okay.
 18 A -- Women for Trump.
 19 Q Did Omarosa say anything to counter that
 20 women -- did she say anything to the effect that women
 21 aren't as smart or capable as men? She didn't say
 22 that, did she?
 23 A I do not know, sir.
 24 Q Okay. Who would say that, women are just as
 25 smart -- do you know why the campaign felt it necessary

Page 115

1 to have a message that said, quote, women are just as
 2 smart and capable as everyone else, end quote?
 3 MR. STONEROCK: Calls for speculation, lacks
 4 foundation, argumentative.
 5 You can answer if you know, Sean.
 6 THE WITNESS: I do not know, sir.
 7 BY MR. PHILLIPS:
 8 Q Okay. And did Omarosa say that women can't
 9 make up their own mind about policies?
 10 MR. STONEROCK: Calls for speculation, lacks
 11 foundation.
 12 You can answer if you know.
 13 THE WITNESS: I do not know, sir.
 14 BY MR. PHILLIPS:
 15 Q Do you know why the campaign felt it important
 16 to put out a message that indeed women can make up
 17 their own mind about policy?
 18 MR. STONEROCK: Same objections.
 19 You can answer if you know, Sean.
 20 THE WITNESS: I do not know.
 21 BY MR. PHILLIPS:
 22 Q Isn't that sexist?
 23 MR. STONEROCK: Objection, calls for a legal
 24 conclusion, argumentative.
 25 You can answer, Sean.

Page 116

1 THE WITNESS: I do not want to assume, but I
 2 would think that most board members wrote their own
 3 scripts, so it would be her herself writing that.
 4 BY MR. PHILLIPS:
 5 Q Okay. Fair enough.
 6 Defendant's 19. We're getting close. There's
 7 only 24, so we've got five more. One, two, three,
 8 four, five, six.
 9 (Playing video:)
 10 IVANKA TRUMP: Women's economic empowerment
 11 isn't just an issue of justice, it's an issue of
 12 prosperity, it's an issue of security. With WEDP,
 13 we're seeking to help countries go from being
 14 recipients of U.S. development assistance to
 15 trading partners.
 16 Simply put, women's economic empowerment is
 17 good, smart defense policy. We're incredibly
 18 excited to be working on this initiative
 19 and showing leadership as we export America's
 20 values of freedom and equality to the world.
 21 When women are economically empowered,
 22 societies prosper and peace prevails.
 23 (End of video.)
 24 (Respondent's Exhibit 19 was identified and
 25 later marked for identification.)

Page 117

1 BY MR. PHILLIPS:

2 Q Do you know if there's anything that -- did

3 the campaign -- I guess the question is related to that

4 ad, ad number 19. Did the campaign put that out

5 related -- specifically to counter any message or

6 statement by Omarosa Manigault Newman?

7 MR. STONEROCK: Objection, calls for

8 speculation, lacks foundation, vague as to

9 specifically.

10 You can answer, Sean.

11 THE WITNESS: I do not know, sir.

12 BY MR. PHILLIPS:

13 Q Okay. Do you know what WGDP is?

14 A No, sir.

15 Q In that -- in that commercial -- do you know

16 where that commercial aired?

17 A It looks like a digital --

18 Q Okay.

19 A -- ad.

20 Q The commercial states we're seeking to help

21 countries. It's -- it's Ivanka Trump, the daughter of

22 Donald Trump; correct?

23 A She is the daughter, yes, sir.

24 Q Okay. Well, let me -- let me pull up another

25 video, which we'll label 19 -- oh, I think because last

Page 118

1 time I didn't have an A. We'll figure that out. But

2 19A.

3 (Playing video:)

4 DONALD J. TRUMP: We should only admit into

5 this country those who share our values and respect

6 our people. In the cold war, we had a ideological

7 screening test. The time is overdo to develop a

8 new screening test for the threats we face today.

9 I call it extreme vetting. I call it extreme,

10 extreme vetting. Our country has enough problems.

11 We don't need more. And these are problems like

12 we've never had before.

13 (Applause.)

14 In addition to screening out all members of

15 the sympathizers of terrorist groups, we must also

16 screen out any who have hostile attitudes towards

17 our country or its principles, or who believe that

18 Sharia law should supplant American law.

19 (Applause.)

20 Those who do not believe in our constitution

21 or who support bigotry and hatred will not be

22 admitted for immigration into our country.

23 (Applause.)

24 Only those who we expect to flourish in our

25 country and to embrace a tolerant American society

Page 119

1 should be issued visas.

2 (Applause.)

3 To put these new procedures in place, we will

4 have to temporarily suspend immigration from some

5 of the most dangerous and volatile regions of the

6 world that have a history of exporting terrorism.

7 Not for us, not for us.

8 (End of video.)

9 (Respondent's Exhibit 19A was identified and

10 later marked for identification.)

11 BY MR. PHILLIPS:

12 Q 19A.

13 Wouldn't it appear that the statements from

14 Donald Trump himself actually counteract the messaging

15 in the political campaign ad that talks about worldwide

16 empowerment and peace and women empowerment?

17 MR. STONEROCK: Objection, vague

18 and ambiguous, vague as to time, compound.

19 You can answer if you understand the question,

20 Sean.

21 THE WITNESS: I do not understand the

22 question.

23 BY MR. PHILLIPS:

24 Q Okay. Let me just real quick -- actually, let

25 me just do this. We'll go to 19B. I can probably skip

Page 120

1 a question and ask it about both.

2 (Playing video:)

3 DONALD J. TRUMP: The U.S. has become a

4 dumping ground for everybody else's problems.

5 UNKNOWN SPEAKER: That's why we need you.

6 (Applause.)

7 DONALD J. TRUMP: Thank you.

8 It's true. And these are the best and the

9 finest.

10 When Mexico sends its people, they're not

11 sending their best. They're not sending you,

12 they're not sending you. They're sending people

13 that have lots of problems, and they're bringing

14 those problems with us. They're bringing drugs,

15 they're bringing crime. They're rapists.

16 And some, I assume, are good people.

17 But I speak to border guards, and they tell us

18 what we're getting. And it only makes common

19 sense, it only makes common sense. They're sending

20 us not the right people. It's coming from more

21 than Mexico. It's coming from all over South

22 and Latin America, and it's coming probably,

23 probably, from the Middle East. But we don't know

24 because we have no protection and we have no

25 confidence. We don't know what's happening.

Page 121

1 And it's got to stop, and it's got to stop fast.
 2 (End of video.)
 3 (Respondent's Exhibit 19B was identified and
 4 later marked for identification.)
 5 BY MR. PHILLIPS:
 6 Q Did you as the campaign or as -- as the
 7 various roles of the campaign from the deputy director
 8 of operations to director of operations, did you
 9 conduct any polling about statements such as the
 10 correlation between Mexicans and rapists or extreme,
 11 extreme vetting, do any polling to determine if that
 12 was actually hurting Donald Trump with foreign-based
 13 but international-born voters?
 14 MR. STONEROCK: Objection, vague
 15 and ambiguous, relevance, vague and ambiguous as to
 16 foreign-based international voters.
 17 You can answer if you understand.
 18 THE WITNESS: I do not.
 19 BY MR. PHILLIPS:
 20 Q Okay. Was any polling done -- are you aware
 21 of any polling -- you know, going back to, I guess, ad
 22 number 19, where the commercial says women's economic
 23 empowerment is not just an issue of justice, it's an
 24 issue of prosperity, and helping countries go from
 25 developmental assistance to trading partners is good,

Page 122

1 smart defense policy versus Trump screaming that
 2 Mexicans are correlated to rapists and we need
 3 ideological screening and extreme, extreme vetting?
 4 Was there any kind of quid pro quo? Was -- did -- did
 5 his opinions lead to that ad? Do you know? Was there
 6 any polling on that?
 7 MR. STONEROCK: Objection, vague
 8 and ambiguous, compound, incomplete hypothetical,
 9 calls for speculation, lacks foundation.
 10 You can answer if you know, Sean.
 11 THE WITNESS: I believe your time frame is
 12 different; right? So that ad does not counteract
 13 statements from 2016. That's a 2020 ad; correct?
 14 BY MR. PHILLIPS:
 15 Q Correct.
 16 A Yeah. So I would -- I don't think that ad is
 17 created for any other statements prior to. So, yeah, I
 18 don't -- I don't think that was -- I don't think it's
 19 correlated at all.
 20 Q Do you agree that there was a -- a narrative
 21 whether -- do you agree that there was a narrative in
 22 the media that Donald Trump was a xenophobe? Or, I
 23 guess, to define xenophobe, had a fear of people
 24 outside of the American nationality?
 25 MR. STONEROCK: Vague as to time.

Page 123

1 You can answer if you understand the question,
 2 Sean.
 3 THE WITNESS: I believe there was negative
 4 media coverage about promoting America and putting
 5 America first.
 6 BY MR. PHILLIPS:
 7 Q Okay. We talked about racism. Is -- is -- I
 8 guess this is a definitional thing so we're on the same
 9 page. But is -- is a statement made disparaging a
 10 religion, so prevent Muslims from entering the country
 11 or casting Muslims out based upon their believe in
 12 Sharia law, or whatever, is -- is that -- is that
 13 racism in your definition?
 14 MR. STONEROCK: Objection, incomplete
 15 hypothetical, misstates the video that we just
 16 watched.
 17 Sean, you can answer if you have an opinion.
 18 THE WITNESS: No, I believe -- I -- I -- I
 19 believe that's a little out of context. I
 20 think the one -- I believe the countries that were
 21 banned were actually Obama's -- were named by Obama
 22 in his administration. So I don't think that you
 23 could say that President Trump was primarily the
 24 driver with deciding countries. But I -- I don't
 25 believe that's racist, no.

Page 124

1 BY MR. PHILLIPS:
 2 Q Do you feel like there was a narrative that
 3 Trump was anti-Muslim going into the 2020 election?
 4 MR. STONEROCK: Vague and ambiguous as to feel
 5 like and narrative, and vague as to time.
 6 THE WITNESS: Going into 2020's election, I
 7 don't think it was, no.
 8 BY MR. PHILLIPS:
 9 Q Okay. Let me go to 20, which is a bit of a
 10 longer commercial. Oh, wait. Let me go to -- let me
 11 do this. Let me do 19C while I'm on this topic. I'll
 12 play this video.
 13 (Playing video:)
 14 REPORTER: Mr. President, will you give an
 15 apology for the statement yesterday?
 16 UNKNOWN SPEAKER: Oh, boy.
 17 REPORTER: Mr. President, did you refer to
 18 African nations as shithole countries?
 19 REPORTER: Mr. President, are you a racist?
 20 REPORTER: Mr. President, will you respond to
 21 these serious questions about your statement, sir?
 22 UNKNOWN SPEAKER: No. It's absolute lies.
 23 REPORTER: I'm talking to the president, not
 24 you.
 25 UNKNOWN SPEAKER: I'm talking to you.

Page 125

1 REPORTER: Mr. President, are you a racist?
 2 (End of video.)
 3 (Respondent's Exhibit 19C was identified and
 4 later marked for identification.)
 5 BY MR. PHILLIPS:
 6 Q That appears to be -- 19C appears to be a clip
 7 from The Guardian. And it appears that media is -- is
 8 questioning Donald Trump about his use of the term
 9 "shithole countries" and whether he was a racist.
 10 And I -- I set that up to say this. You know,
 11 do you agree that there was, you know, way more than
 12 Omarosa out there with the narrative that Donald Trump
 13 was racist?
 14 MR. STONEROCK: Vague and ambiguous as to the
 15 time, vague as to way more.
 16 You can answer, Sean, if you understand.
 17 THE WITNESS: I think there were other
 18 narratives being pushed by media network.
 19 BY MR. PHILLIPS:
 20 Q Okay. Can you differentiate what harm was
 21 caused by networks and what harm was caused by Omarosa
 22 Manigault Newman?
 23 MR. STONEROCK: Calls for a legal conclusion,
 24 incomplete hypothetical, calls for speculation,
 25 lacks foundation.

Page 126

1 You can answer, Sean, if you have an opinion
 2 on that.
 3 THE WITNESS: Yeah, I am -- I'm unaware about
 4 polling after any type of incident, and that would
 5 have been whether the president said it or another
 6 individual or a news network saying it.
 7 BY MR. PHILLIPS:
 8 Q Okay. I guess -- and we'll get into the
 9 contract probably next, the NDA. But the campaign is
 10 seeking damages from Omarosa Manigault Newman for
 11 saying comments, at least as we've talked about so far,
 12 about -- or carrying on a narrative about whether
 13 Donald Trump was a racist.
 14 And what I'm trying to understand is there --
 15 is there any way that you've -- you've determined to --
 16 to isolate comments made by Omarosa Manigault Newman as
 17 opposed to media as to how it damaged Donald Trump or
 18 the campaign?
 19 MR. STONEROCK: Calls for a legal conclusion,
 20 calls for expert testimony.
 21 Sean, you can answer if there's anything
 22 you've personally done.
 23 THE WITNESS: So I did give a little -- I
 24 guess it's more of a description of, like, the
 25 money spent on ads that were both from the news

Page 127

1 networks and then, also, Omarosa as well. The news
 2 networks didn't sign an NDA with the campaign, so,
 3 I mean, it's just a little different. But there
 4 was a lot of money spent within media to try to
 5 correct the narrative.
 6 BY MR. PHILLIPS:
 7 Q And the narrative was created by media,
 8 Omarosa, and other individuals?
 9 A I believe Omarosa had more of a -- like I said
 10 before, the insider role, and had a lot more
 11 credibility to other voters. So news networks like CNN
 12 and others, obviously some people don't put any
 13 credibility to those networks. But when you have an
 14 individual who, whether they worked on the campaign or
 15 knew someone personally, then they put a little bit
 16 more credibility to it. So, yes, I would say that the
 17 campaign spent money --
 18 Q Would people --
 19 A -- (inaudible).
 20 Q Sorry.
 21 Would people put credibility in Donald --
 22 COURT REPORTER: I'm sorry. There were a few
 23 words there at the end that I could not hear. I
 24 ended with "I would say that the campaign spent
 25 money . . ."

Page 128

1 MR. PHILLIPS: That was my fault, Sean.
 2 THE WITNESS: Oh, it's all right.
 3 I was -- I was saying a significant amount of
 4 money to try to counteract narrative pretty much.
 5 BY MR. PHILLIPS:
 6 Q Okay. And -- and I would imagine these --
 7 and we haven't identified a single person who didn't
 8 vote for Donald Trump or withheld a donation from
 9 Donald Trump because of something Omarosa Manigault
 10 Newman said; correct?
 11 MR. STONEROCK: Objection, misstates his
 12 testimony.
 13 You can answer, Sean.
 14 Calls for speculation, lacks foundation.
 15 If you have any personal knowledge, you can
 16 answer.
 17 THE WITNESS: I do not have personal knowledge
 18 of anybody, no, sir.
 19 BY MR. PHILLIPS:
 20 Q Okay. Would Donald Trump's own family member,
 21 Mary Trump, if she said Donald Trump was racist and his
 22 father was racist, wouldn't that ought to be
 23 influential in this narrative that Donald Trump is
 24 racist?
 25 MR. STONEROCK: Calls for speculation, lacks

Page 129

1 foundation, incomplete hypothetical.
 2 You can answer if you know, Sean.
 3 THE WITNESS: I mean, I -- I do not know. I
 4 would think that there were other individuals, yes.
 5 BY MR. PHILLIPS:
 6 Q Okay. We'll use this as 19C [sic].
 7 (Playing video:)
 8 CNN ANCHOR: I want to ask you about the
 9 Anti-Defamation League, which this week called on
 10 you to publicly condemn unequivocally the racism of
 11 former KKK Grand Wizard David Duke, who recently
 12 said that voting against you at this point would be
 13 treason to your heritage.
 14 Will you unequivocally condemn David Duke and
 15 say that you don't want his vote or that of other
 16 white supremacists in this election?
 17 DONALD J. TRUMP: Well, just so you
 18 understand, I don't know anything about David Duke.
 19 Okay? I don't know anything about what you're even
 20 talking about with white supremacy or white
 21 supremacists. So I don't know. I mean, I don't
 22 know. Did he endorse me, or what's going on?
 23 Because, you know, I know nothing about David Duke,
 24 I know nothing about white supremacists, and so
 25 you're asking me a question that I'm supposed to be

Page 130

1 talking about people that I know nothing about.
 2 CNN ANCHOR: But I guess the question from the
 3 -- from the Anti-Defamation League is even if you
 4 don't know about their endorsement, there are these
 5 groups and individuals endorsing you. Would you
 6 just say unequivocally you condemn them and you
 7 don't want their support?
 8 DONALD J. TRUMP: Well, I have to look at the
 9 group. I mean, I don't know what group you're
 10 talking about. You wouldn't want me to condemn a
 11 group that I know nothing about. I would have to
 12 look. If you would send me a list of the groups, I
 13 will do research on them, and certainly I would
 14 disavow if I thought there was something wrong.
 15 CNN ANCHOR: The Klu Klux Klan?
 16 DONALD J. TRUMP: But you may have groups in
 17 there that are totally fine and it would be very
 18 unfair. So give me a list of the groups and I'll
 19 let you know.
 20 CNN ANCHOR: Okay. I mean, I'm just talking
 21 about David Duke and the Klu Klux Klan here,
 22 but . . .
 23 DONALD J. TRUMP: I don't know any --
 24 honestly, I don't know David Duke. I don't believe
 25 I've ever met him. I'm pretty sure I didn't meet

Page 131

1 him. And I just don't know anything about him.
 2 (End of video.)
 3 (Respondent's Exhibit 19D was identified and
 4 later marked for identification.)
 5 BY MR. PHILLIPS:
 6 Q Would comments like that -- I know there's
 7 been a few opportunities that Donald Trump has been, at
 8 a minimum, given negative news coverage for not
 9 renouncing white supremacy or the KKK. But I guess my
 10 question is would you agree that those would contribute
 11 to a narrative that he is racist?
 12 MR. STONEROCK: Objection, incomplete
 13 hypothetical, calls for speculation, lacks
 14 foundation, misstates the video, misstates the
 15 record.
 16 You can answer, Sean, if you have an opinion.
 17 THE WITNESS: I don't have an opinion.
 18 BY MR. PHILLIPS:
 19 Q Okay. Can someone support the KKK
 20 and simultaneously not be a racist? Do you have an
 21 opinion?
 22 MR. STONEROCK: Objection, incomplete
 23 hypothetical, argumentative, calls for speculation,
 24 lacks foundation, relevance.
 25 You can answer, Sean, if you have an opinion.

Page 132

1 THE WITNESS: I don't have an opinion.
 2 BY MR. PHILLIPS:
 3 Q Can one be a white supremacist and not be a
 4 racist?
 5 MR. STONEROCK: Same objections.
 6 THE WITNESS: I don't have an opinion to that,
 7 either.
 8 BY MR. PHILLIPS:
 9 Q Okay. Would expressing -- would -- would
 10 garnering support for white supremacist
 11 organizations -- I -- I kind of reflect back to a -- I
 12 believe it was a Joe Biden quote, that I don't have to
 13 call Donald Trump a racist because the racists know
 14 he's a racist. I say that to set up a question because
 15 that was purely paraphrased.
 16 Would having support of white supremacist
 17 groups have contributed to a narrative that Donald
 18 Trump was indeed a white supremacist or a racist?
 19 MR. STONEROCK: Calls for speculation, lacks
 20 foundation, argumentative, incomplete hypothetical.
 21 You can answer if you understand the question,
 22 Sean.
 23 THE WITNESS: John, if you could repeat that,
 24 the question, please.
 25 BY MR. PHILLIPS:

Page 133

1 Q Sure. Would -- I'm trying to find a way to
 2 phrase it shorter. We'll move along. We'll do 19 --
 3 we'll do 19D [sic]. It's a very quick clip.
 4 (Playing video:)
 5 DONALD J. TRUMP: Negotiating with -- with
 6 Japan, negotiating with China, when these people
 7 walk in the room they don't say: Oh, hello. How's
 8 the weather? It's so beautiful outside. Isn't it
 9 lovely. How are the Yankees doing? Oh, they're
 10 doing wonderful. Great.
 11 They say: We want deal. He'd jump out of the
 12 seat. But --
 13 (End of video.)
 14 (Respondent's Exhibit 19E was identified and
 15 later marked for identification.)
 16 BY MR. PHILLIPS:
 17 Q And, you know, again I'm not asking you is
 18 that a racist comment because that seems to me to be a
 19 matter of opinion. But would comments like that be a
 20 part of the countermessaging the campaign had to do
 21 related to race?
 22 MR. STONEROCK: Calls for speculation, lacks
 23 foundation, vague as to time.
 24 You can answer it, Sean, if you know.
 25 THE WITNESS: No, sir.

Page 134

1 BY MR. PHILLIPS:
 2 Q Is it okay to mock somebody's foreign --
 3 foreign accent or way of speaking?
 4 MR. STONEROCK: Objection, argumentative.
 5 You can answer if you have an opinion, Sean.
 6 THE WITNESS: Say that again, John. Sorry.
 7 BY MR. PHILLIPS:
 8 Q Yeah. The -- the -- I mean -- and, again,
 9 I -- I don't want to get into my personal
 10 characterization, but that clip has been played in
 11 media -- in media at a minimum to characterize Donald
 12 Trump as racially insensitive or racist because of the
 13 way that he characterized Asian Americans or Asian
 14 American way of speaking.
 15 And I guess my question is, would that have
 16 been part of the justification for, you know, ads that
 17 show Donald Trump isn't a racist?
 18 MR. STONEROCK: Objection, incomplete
 19 hypothetical, calls for speculation, lacks
 20 foundation, vague as to time.
 21 You can answer, Sean, if you know.
 22 THE WITNESS: No, sir, I don't believe any
 23 type of replay of that clip or anything. I mean,
 24 you said Asian Americans, but I don't believe
 25 that's what he was talking about. Right. So --

Page 135

1 so, no, I don't think any ads were actually created
 2 to try to counteract that.
 3 BY MR. PHILLIPS:
 4 Q Right. And I think you're right. I think he
 5 was going straight as to either Japanese or Chinese
 6 individuals, not -- not Japanese or Chinese Americans.
 7 But we were -- you know, this all stemmed off an ad
 8 talking about economic empower- -- empowerment and --
 9 and helping each -- each nation.
 10 And I guess my question, you know, stemmed
 11 from isn't that contradictory, meaning isn't mocking a
 12 culture of people exactly opposite of saying we're --
 13 we're one world and -- and -- and it's not an issue of
 14 justice, it's an issue of prosperity?
 15 MR. STONEROCK: Objection, misstates the video
 16 clip of Mr. Trump speaking, argumentative, vague
 17 and ambiguous as to time, calls for speculation,
 18 lacks foundation, incomplete hypothetical.
 19 You can answer, Sean, if you understand.
 20 THE WITNESS: I'm -- I don't believe that he
 21 was mocking anyone in that clip, so . . .
 22 BY MR. PHILLIPS:
 23 Q Okay. While we're -- I'll do 19E [sic] while
 24 we're on mocking.
 25 (Playing video:)

Page 136

1 JOHN BERMAN: Donald Trump is facing new
 2 criticism for something he did on the campaign
 3 trail last night in South Carolina. While
 4 defending his debunked claim that he saw thousands
 5 of Muslims celebrate the collapse of the Twin
 6 Towers here in New York, he appeared to mock a
 7 reporter with a disability.
 8 Take a look.
 9 DONALD J. TRUMP: Written by a nice reporter.
 10 Now the poor guy -- you've got to see this guy.
 11 Oh, I don't know what I said. I don't remember.
 12 He's going, like: I don't remember. Maybe that's
 13 what I said.
 14 This was 14 years ago. He's still -- they
 15 didn't do a retraction.
 16 JOHN BERMAN: That reporter he is talking
 17 about is Serge Kovalski, who now works for The New
 18 York Times. As you can see right there, he suffers
 19 from a chronic condition that impairs movement of
 20 his arms. A Times spokesman says they find it
 21 outrageous that Trump would ridicule the man's
 22 appearance.
 23 (End of video.)
 24 (Respondent's Exhibit 19F was identified and
 25 later marked for identification.)

Page 137

1 BY MR. PHILLIPS:

2 Q Was that an example of unfavorable media

3 coverage of your candidate?

4 A I would say so.

5 Q Was that an example of fair or unfair media

6 coverage of your candidate?

7 MR. STONEROCK: Objection, relevance. What

8 does this video have anything to do with any of the

9 claims in this case or any of the damages that the

10 campaign suffered?

11 You can -- you know, you can answer, Sean, if

12 you have an opinion.

13 MR. PHILLIPS: Please stop with the speaking

14 objections, Ryan.

15 MR. STONEROCK: You did it all day on Monday.

16 So you -- you stop, and then we can talk.

17 MR. PHILLIPS: I haven't had one speaking

18 objection today.

19 MR. STONEROCK: Yeah, you're taking the

20 deposition. You're not making objections.

21 MR. PHILLIPS: You are a lawyer.

22 THE WITNESS: So can you say the -- I don't --

23 I think --

24 BY MR. PHILLIPS:

25 Q Yeah. Was that unfavorable or favorable media

Page 138

1 coverage of your candidate?

2 A Again, kind of to go off of what Ryan said, I

3 -- I think that it really doesn't have anything to do

4 with the 2020 election. The question itself would be

5 unfavorable media coverage, but that was also 2016.

6 Q Okay. 2016 came before 2020; correct?

7 A Yes.

8 Q Okay. And so the opinion in some voters'

9 minds would be built on not days, not just weeks, but

10 years of experience with a candidate -- is that fair --

11 in politics?

12 MR. STONEROCK: Calls for speculation, lacks

13 foundation, incomplete hypothetical.

14 Sean, you can answer if you have a -- if you

15 have a response.

16 THE WITNESS: I don't think that creating ads

17 for a 2020 election would try to counteract a

18 narrative from 2016 outside of what the president

19 already did in keeping to his promises when he was

20 in office, so . . .

21 BY MR. PHILLIPS:

22 Q So all of the negative portrayals, whether

23 it's Access Hollywood, whether it's mock -- potentially

24 mocking the disabled, whether it's calling African

25 nations shithole countries, whether it's saying, you

Page 139

1 know, a number of things, all of the need to

2 rehabilitate Donald Trump's image is because of

3 Omarosa, not because he's got a terrible image because

4 he says terrible things?

5 MR. STONEROCK: Objection, compound, misstates

6 his testimony.

7 You can answer.

8 THE WITNESS: I think ads that are created

9 within an election are based off of what's fresh in

10 voters' minds. But, yeah, that's -- that about

11 sums up that one.

12 BY MR. PHILLIPS:

13 Q Okay. Move on to the campaign produced --

14 produced to me video number 20. Oh, five minutes.

15 (Playing video:)

16 CATALINA LAUF: I'm Catalina Lauf. I work in

17 a political space.

18 MADELINE LAUF: And I'm Madeline Lauf. And

19 I'm the founder of Begin Health, a children's

20 nutritional company.

21 CATALINA LAUF: We grew up in a really small

22 town outside of Chicago.

23 MADELINE LAUF: Our mom's from Guatemala, our

24 dad's a small business owner from Chicago, and so

25 they brought two different cultures together to

Page 140

1 create us. A little bit of crazy and . . .

2 CATALINA LAUF: A little bit of fun, I guess.

3 MADELINE LAUF: Yes.

4 CATALINA LAUF: They taught us the values of

5 hard work, liberty, to love this country

6 unapologetically.

7 Our dad is a bee keeper, and just had so many

8 different things out in the countryside and it was

9 just such a sweet thing.

10 MADELINE LAUF: We grew up selling honey --

11 CATALINA LAUF: Yeah.

12 MADELINE LAUF: -- at farmer's markets.

13 CATALINA LAUF: Yeah.

14 MADELINE LAUF: So my line was: Have you ever

15 been stung by a bee?

16 But, really, it was teaching us, again,

17 entrepreneurship, small business, self-reliance,

18 and that we're the ones that need to put in the

19 hard work to get what we want.

20 CATALINA LAUF: And my mother being from

21 Guatemala, escaping what she had there, growing up

22 in poverty, and coming here to the United States,

23 being able to fulfill her destiny and be somebody

24 that she couldn't there in her home country.

25 MADELINE LAUF: And they really instilled in

Page 141

1 us the sense of purpose, but, also,
 2 self-accountability. And that we had to strive to
 3 do the things that we wanted, and it was up to us
 4 to make those things happen.
 5 CATALINA LAUF: In America, there's no ceiling
 6 of opportunity. You know, you define your own
 7 destiny through personal responsibility, through
 8 hard work, through having a moral value system.
 9 That's the American dream. And President Trump's
 10 providing that for everybody.
 11 MADELINE LAUF: Look at my business, Begin
 12 Health. As a small start-up that is growing
 13 and launching, we are constantly trying to
 14 innovate.
 15 And the big challenge that COVID brought that
 16 we just didn't see coming was that just almost
 17 everything kind of just shut down. And when you
 18 are a small start-up and you have limited funding
 19 and the funding is really only to kind of get you
 20 to that next milestone, we were really struggling.
 21 And so we were able to apply for a PPP loan,
 22 which really helped allow us to continue hiring
 23 and working and developing our products so that we
 24 could ultimately still launch.
 25 CATALINA LAUF: It's now more than ever so

Page 142

1 important to have a president and an administration
 2 that understands that small business is the
 3 backbone of our economy.
 4 The Tax Cuts and Jobs Act was huge,
 5 manufacturing, deregulation, fair trade. These are
 6 things that affected real Americans.
 7 We have a champion in the oval office who has
 8 this business background. He actually understands
 9 the need for small businesses like my sister's to
 10 survive.
 11 We aren't the stereotypical conservative. I
 12 mean, we're -- we come from Hispanic descent,
 13 and we're millennial women, and that's not what the
 14 media wants. And so somebody like AOC, Alexandria
 15 Ocasio-Cortez, this far left, these women come out
 16 with these very, very destructive political
 17 ideologies that are trying to infiltrate
 18 millennials and the next generation. I've decided
 19 to step up and say: Well, we need a countervoice
 20 to these women.
 21 MADELINE LAUF: There has been an assault on
 22 capitalism just generally. And I think it's very
 23 scary to imagine a Biden world where the
 24 progressive wing ideas are starting to take front
 25 and center stage. You know, that will really choke

Page 143

1 the American economy. There will be
 2 overregulation, overtaxation. It's very hard to
 3 innovate through those two things.
 4 And ultimately what's really sad is the
 5 thought of, you know, making all of us dependent on
 6 the government, and we are not going to allow that.
 7 CATALINA LAUF: I've seen a lot of moderates,
 8 a lot of people now changing over because of
 9 everything that's been happening. This is a taste
 10 of Biden's America. I mean, this -- the rioting,
 11 the crime. Freedom is at stake now. And this is
 12 going to be the most important election of our
 13 lifetime.
 14 MADELINE LAUF: We want to preserve the
 15 America that our mother came here for.
 16 CATALINA LAUF: Having a thriving economy,
 17 that is keeping American great, and President Trump
 18 has delivered on that promise. He's truly fighting
 19 for the American people.
 20 We're the greatest country in the world,
 21 period. On our worst day, we're still the greatest
 22 country in the world. And in order to preserve
 23 that, it's by putting America first, having a
 24 thriving economy, having happiness.
 25 (End of video.)

Page 144

1 (Respondent's Exhibit 20 was identified and
 2 later marked for identification.)
 3 BY MR. PHILLIPS:
 4 Q Did that -- I noticed that video mentioned
 5 Congresswoman Ocasio-Cortez. Did that -- did that
 6 video mention Omarosa Manigault Newman?
 7 A No.
 8 Q Okay. How -- how was that video in any way
 9 responsive to any of Ms. Newman's comments or
 10 statements?
 11 MR. STONEROCK: Calls for speculation, lacks
 12 foundation.
 13 You can answer if you know, Sean.
 14 THE WITNESS: It's a great commercial, just
 15 like all the others. They've been really good
 16 today.
 17 Overall, I think it still goes back to the
 18 same statement before, and that's building the
 19 coalition of voters for the president.
 20 BY MR. PHILLIPS:
 21 Q Okay. So that has nothing to do with Omarosa
 22 Manigault Newman?
 23 MR. STONEROCK: Objection, misstates his
 24 testimony.
 25 BY MR. PHILLIPS:

<p style="text-align: right;">Page 145</p> <p>1 Q Did it have anything to do with Omarosa 2 Manigault Newman?</p> <p>3 A So comments made by Omarosa, I don't think it 4 -- like we discussed, I don't think it mentioned her at 5 all in that commercial. But it's trying to correct a 6 narrative that was out there publicly by Omarosa, among 7 other things. But, yes.</p> <p>8 Q Okay. There was a burning police vehicle, 9 talking about, at the same time, Biden's America. Did 10 the voters of the United States choose Biden's America?</p> <p>11 MR. STONEROCK: Objection, vague and ambiguous 12 as to Biden's America, calls for speculation, lacks 13 foundation.</p> <p>14 MR. PHILLIPS: That's fair. I'll withdraw 15 that question.</p> <p>16 BY MR. PHILLIPS:</p> <p>17 Q Who won the election?</p> <p>18 A President Biden.</p> <p>19 Q Okay. Do you have -- do you have a belief 20 that that election is gonna be overturned?</p> <p>21 MR. STONEROCK: Objection, irrelevant. 22 I'm going to instruct the witness not to 23 answer it.</p> <p>24 MR. PHILLIPS: Okay.</p> <p>25 BY MR. PHILLIPS:</p>	<p style="text-align: right;">Page 147</p> <p>1 deemed an essential business, a mother as well.</p> <p>2 DAWN: I am. I am a mother of four. And I 3 have two identical twins.</p> <p>4 KRISTY: Yes, I homeschool my daughter, 5 and I'm also an ESL teacher. I teach English as a 6 second language. And my daughter --</p> <p>7 JOHN PENCE: That's great.</p> <p>8 KRISTY: -- has to call me Teacher Kristy.</p> <p>9 JOHN PENCE: Before I begin, I actually wanted 10 to invite a special guest who wanted to thank you 11 personally today.</p> <p>12 DAWN: Okay.</p> <p>13 LARA TRUMP: Hello. Hi, Kristy.</p> <p>14 KRISTY: Oh, my gosh.</p> <p>15 LARA TRUMP: How are you?</p> <p>16 KRISTY: I was going to say, like, is there 17 any way I can take a screenshot of this somehow?</p> <p>18 LARA TRUMP: I wanted to say hello.</p> <p>19 I know that you've been one of the fortunate 20 ones that your business has been able to stay open 21 right now, in the time of coronavirus, when many of 22 us are working from home.</p> <p>23 How has everything been going?</p> <p>24 DAWN: It's going good. The construction 25 projects are really just starting to -- to begin</p>
<p style="text-align: right;">Page 146</p> <p>1 Q Did Donald Trump draft and create the PPP 2 loan, or did Congress?</p> <p>3 MR. STONEROCK: Calls for speculation, lacks 4 foundation.</p> <p>5 You can answer if you know, Sean.</p> <p>6 THE WITNESS: I'm unaware.</p> <p>7 BY MR. PHILLIPS:</p> <p>8 Q Okay. 21. Oh, goodness. These are long. 9 Okay.</p> <p>10 (Playing video:)</p> <p>11 JOHN PENCE: I'm John Pence with Team Trump. 12 Today we'll speak with real American heros, a 13 mother from Macomb County, Michigan, who voted for 14 President Obama twice, but is ready to vote Trump 15 again in November.</p> <p>16 Another mother and business owner from 17 Pennsylvania who's running an essential business 18 while homeschooling her twin children.</p> <p>19 We want to talk with them, real American 20 heros.</p> <p>21 Hey, Kristy, how are you?</p> <p>22 KRISTY: Can you see me?</p> <p>23 JOHN PENCE: I can see you. There you are.</p> <p>24 DAWN: Thank you for having me.</p> <p>25 JOHN PENCE: You are in Pennsylvania. You are</p>	<p style="text-align: right;">Page 148</p> <p>1 this weekend.</p> <p>2 LARA TRUMP: I just wanted to -- to say thank 3 you for obviously supporting the president.</p> <p>4 KRISTY: She's eavesdropping. Zoey -- Zoey, 5 this is Lara Trump.</p> <p>6 LARA TRUMP: Hi.</p> <p>7 ZOEY: Hello.</p> <p>8 LARA TRUMP: How are you? Aww.</p> <p>9 DAWN: Thank you. And thank your family for 10 everything. I don't -- I feel like not only do we 11 get a -- a president, but we've got a -- a whole 12 family working.</p> <p>13 LARA TRUMP: Oh, you're so nice.</p> <p>14 DAWN: And I can't thank you enough.</p> <p>15 LARA TRUMP: Thank you.</p> <p>16 KRISTY: A couple years ago my daughter and I 17 wrote a note to him saying how we love him and 18 we're praying for him because he hears all kinds of 19 bad stuff, and we got this back.</p> <p>20 LARA TRUMP: Oh, my gosh. Look at that.</p> <p>21 DONALD J. TRUMP: We have to take care of our 22 people.</p> <p>23 LARA TRUMP: How are things feeling in -- in 24 Western Pennsylvania these days for the president?</p> <p>25 DAWN: I think it's really good. I think that</p>

Page 149

1 our blue state is turning red.

2 KRISTY: And I have to say, as great as I

3 thought of him in 2016, he's exceeded all of my

4 expectations. I'm so grateful for him. He's done

5 more than I think anyone thought a president could

6 do, especially with all the resistance, so . . .

7 JOHN PENCE: Promises made, promises kept;

8 right?

9 LARA TRUMP: Oh, wow. We know he's the right

10 man for the job.

11 DAWN: The only man for the job.

12 LARA TRUMP: He is the only man. He did it

13 once, he'll do it again.

14 But again, I just wanted to -- to say hello

15 and say thank you again for being such a great

16 supporter of our president.

17 It was so nice to talk to you and see you

18 and meet your daughter.

19 KRISTY: Thank you so much.

20 JOHN PENCE: Take care.

21 KRISTY: Bye.

22 JOHN PENCE: So that's the American story, a

23 story of two mothers, who, as we fight this virus,

24 are doing their part to beat it. It's a story of

25 prevailing. It's a story of America. And they

Page 150

1 know that President Trump has their back.

2 Together we can keep America great. Until

3 then, stay safe.

4 DONALD J. TRUMP: You will never be forgotten

5 again. The forgotten men and women of this country

6 will never, ever be forgotten again.

7 (End of video.)

8 (Respondent's Exhibit 21 was identified and

9 later marked for identification.)

10 BY MR. PHILLIPS:

11 Q Plaintiff's 21.

12 Who is John Pence?

13 A He's the vice president's, or ex-vice

14 president's, nephew.

15 Q Okay. Did he have a role with the campaign at

16 that period in time?

17 A Yes.

18 Q What was it?

19 A John had a few different roles on the

20 campaign. I think at that point in time was more

21 grassroots efforts.

22 Q And who was Lara Trump?

23 A It's President Trump's daughter-in-law.

24 Q Would that be Eric Trump's wife?

25 A Yes, sir.

Page 151

1 Q Okay. Did she have a role with the campaign

2 at that time?

3 A Yes, sir.

4 Q Did you have a conversation with Lara Trump

5 about Omarosa Manigault Newman?

6 A Yes, sir.

7 Q Tell me about that.

8 A She asked me about hiring her back onto the

9 campaign, and what type of roles we would be able to

10 provide her.

11 Q And what did you say?

12 A I said we can give whatever role we need to

13 do, and then it would be great to have her back on the

14 team.

15 Q Did you talk compensation?

16 MR. STONEROCK: Objection as to time.

17 BY MR. PHILLIPS:

18 Q During that conversation or around that

19 conversation with Lara Trump, did you talk about

20 compensation related to bringing Omarosa Manigault

21 Newman back to the campaign after she finished her

22 Whitehouse tenure?

23 A I believe so.

24 Q Do you recall what that compensation that were

25 to be offered to Omarosa Manigault Newman would be?

Page 152

1 A No, sir.

2 Q Does \$15,000 a month sound correct?

3 A It sounds about right.

4 Q Okay. And what was Omarosa Manigault Newman

5 to do for the campaign for \$15,000 a month?

6 MR. STONEROCK: Calls for speculation, lacks

7 foundation.

8 You can answer if you know, Sean.

9 THE WITNESS: I think it would have been more

10 of, like, an advisory role, still building

11 coalitions. We were still a campaign. And then

12 bringing her on to help build for the 2020

13 reelection.

14 BY MR. PHILLIPS:

15 Q Would it require signing the Donald J. Trump

16 for President, Inc. Companion Agreement that was

17 presented to her?

18 MR. STONEROCK: Calls for speculation, lacks

19 foundation.

20 You can answer if you know.

21 THE WITNESS: Yes, sir.

22 BY MR. PHILLIPS:

23 Q Okay. And you were the proposed signatory of

24 that agreement, were you not? Do you recall?

25 A I believe so, sir.

<p style="text-align: right;">Page 153</p> <p>1 Q Okay. Let me just pull that up for you.</p> <p>2 Basic. I've done so many videos, now I've got to</p> <p>3 remember how to do -- let's do it this way. Nope.</p> <p>4 Yep.</p> <p>5 Can you see that agreement?</p> <p>6 A Yes, I can, sir.</p> <p>7 Q Okay. I don't know -- I put where you could</p> <p>8 control it. I don't know if you can control it or not.</p> <p>9 Can you move it?</p> <p>10 A No, sir.</p> <p>11 Q Okay.</p> <p>12 A And there's a little tab over here. Let me</p> <p>13 see if this has anything to do with it.</p> <p>14 No, sir.</p> <p>15 Q Well, let me know what you need me to do to</p> <p>16 familiarize yourself with it. But I'm going to have a</p> <p>17 couple questions. I'm going to start with page 1,</p> <p>18 and I'm going to scroll down real quick to page 6.</p> <p>19 Is that your name as -- as potential</p> <p>20 signatory, Sean Dollman, director of operations for</p> <p>21 Donald J. Trump for President, Inc.?</p> <p>22 A Yes, sir.</p> <p>23 Q And this was to be signed by Omarosa Manigault</p> <p>24 Newman; is that correct?</p> <p>25 A Yes, sir.</p>	<p style="text-align: right;">Page 155</p> <p>1 about, or proposed contract, to avoid any doubt?</p> <p>2 MR. STONEROCK: Objection, calls for a legal</p> <p>3 conclusion.</p> <p>4 John, can you just scroll down to paragraph 10</p> <p>5 so I can see it?</p> <p>6 MR. PHILLIPS: Yes. Sure. Sure.</p> <p>7 MR. STONEROCK: All right. Sean -- I mean,</p> <p>8 I've -- I've read it. Let us know when you're</p> <p>9 ready, Sean.</p> <p>10 BY MR. PHILLIPS:</p> <p>11 Q And I'm not asking for a legal conclusion. My</p> <p>12 question is do you know why this paragraph 2, page 2,</p> <p>13 says, "To avoid any doubt, you agree that this shall</p> <p>14 survive the termination of this agreement pursuant to</p> <p>15 paragraph 10"? Did you have any understanding as to</p> <p>16 why that was in there?</p> <p>17 MR. STONEROCK: Objection, calls for a legal</p> <p>18 conclusion, calls for attorney work product, calls</p> <p>19 for attorney-client communications.</p> <p>20 You can answer, Sean, to the extent it's not</p> <p>21 based upon anything you would have discussed with</p> <p>22 legal counsel.</p> <p>23 THE WITNESS: No, I did not write the</p> <p>24 document, so . . .</p> <p>25 BY MR. PHILLIPS:</p>
<p style="text-align: right;">Page 154</p> <p>1 Q Do you know who drafted this?</p> <p>2 A It would have been legal counsel.</p> <p>3 Q Do you know who legal counsel was at that</p> <p>4 time?</p> <p>5 A I believe it was Jones Day.</p> <p>6 Q Okay. What was the purpose of getting Omarosa</p> <p>7 Manigault Newman to sign the Companion Agreement as you</p> <p>8 were aware of it, to the extent you were aware of it?</p> <p>9 A Everybody who was employed by the campaign</p> <p>10 signed an NDA.</p> <p>11 Q Okay. And -- and you were aware at this</p> <p>12 point, I assume, that Omarosa had already signed an NDA</p> <p>13 with the campaign when she worked at the campaign;</p> <p>14 right?</p> <p>15 A Yes, sir.</p> <p>16 Q Okay. Why did she need another one?</p> <p>17 A This one included the Pence family as well.</p> <p>18 Q Okay. I want to direct you to the No</p> <p>19 Disparagement clause, which is on page 2, number 2.</p> <p>20 This No Disparagement clause is a little different from</p> <p>21 the other NDA in that there is that last sentence, "To</p> <p>22 avoid any doubt, you agree that this shall survive the</p> <p>23 termination of this agreement pursuant to paragraph</p> <p>24 10."</p> <p>25 Do you know what that contract is talking</p>	<p style="text-align: right;">Page 156</p> <p>1 Q Okay. Did you have any discussions with Lara</p> <p>2 Trump or anybody else that's non-counsel related to</p> <p>3 what doubt might have been in a prior contract that she</p> <p>4 signed?</p> <p>5 MR. STONEROCK: Objection. Same objection as</p> <p>6 the last time around.</p> <p>7 THE WITNESS: I mean, every- -- everybody</p> <p>8 signed an NDA.</p> <p>9 BY MR. PHILLIPS:</p> <p>10 Q Did you have any conversations with Lara Trump</p> <p>11 about why Omarosa specifically needed to sign a new</p> <p>12 NDA?</p> <p>13 A She was coming back to the campaign. We had a</p> <p>14 new NDA.</p> <p>15 Q Okay. Was the other NDA expired? Was that</p> <p>16 part of your conversations with Lara Trump?</p> <p>17 MR. STONEROCK: Objection, calls for a legal</p> <p>18 conclusion, calls for attorney work product, calls</p> <p>19 for attorney-client privileged communications.</p> <p>20 You can answer if you specifically discussed</p> <p>21 that issue with Lara Trump.</p> <p>22 THE WITNESS: That was not discussed.</p> <p>23 BY MR. PHILLIPS:</p> <p>24 Q Okay.</p> <p>25 A To my knowledge, it was not discussed. I</p>

Page 157

1 don't -- I don't recall the entire conversation.

2 Q How many conversations did you have with Lara

3 Trump over bringing Omarosa Manigault Newman back to

4 the campaign?

5 A I'm -- I'm unsure. I would probably say it

6 was a while ago. Maybe two to three, possibly four.

7 Q Was there any expression by Lara Trump that --

8 that wanted to bring Omarosa Manigault Newman back to

9 the campaign to shut her up or to prevent her from

10 talking further about Donald Trump?

11 A No, sir.

12 Q Okay. So paragraph 2, page 2, says, "To avoid

13 any doubt, you agree that this shall survive the

14 termination of this agreement pursuant to paragraph

15 10."

16 And I suspect you -- you don't know about

17 paragraph 10, either, but I've got to ask the

18 questions. Do you know how or why paragraph 10 was

19 inserted into this document?

20 MR. STONEROCK: Objection, calls for a legal

21 conclusion, calls for attorney work product, calls

22 for attorney-client communications.

23 Sean, you can answer if you have knowledge

24 based upon anything but what -- what counsel for

25 the campaign may or may not have told you.

Page 158

1 THE WITNESS: I mean, I -- I -- I do not know.

2 I believe the survival was also in the original NDA

3 as well.

4 BY MR. PHILLIPS:

5 Q Okay. So I guess assuming the survival

6 paragraph 10 was also in the other standard NDA, do you

7 know why emphasis was added "To avoid any doubt" -- "to

8 avoid any doubt, you agree that this shall survive the

9 termination pursuant to paragraph 10"? Why that phrase

10 was added?

11 MR. STONEROCK: Calls for a legal conclusion,

12 calls for attorney work product, calls for

13 attorney-client communications, asked and answered.

14 Sean, you can answer if you have any knowledge

15 based upon anything other than conversations or

16 communications with counsel.

17 THE WITNESS: No, sir.

18 BY MR. PHILLIPS:

19 Q Okay.

20 MR. PHILLIPS: We'll attach that as

21 Defendant's 21B because it came out of the Lara

22 Trump video.

23 (Respondent's Exhibit 21B was identified and

24 later marked for identification.)

25 We are going to attach this one as -- this

Page 159

1 Consulting Agreement as 21C. I realize I'm

2 skipping -- I guess because 21 is 21A.

3 (Respondent's Exhibit 21C was identified and

4 later marked for identification.)

5 BY MR. PHILLIPS:

6 Q So this is a Consulting Agreement that would

7 be effective January 21 -- or, sorry -- January 22,

8 2018. Just to scroll through, services under the

9 exhibit would be surrogate speaking appearances,

10 fundraising appearances, diversity outreach. I'm happy

11 to flip to -- there's three slides, essentially. I'm

12 happy to flip to any of them.

13 But do you know whether this Consulting

14 Agreement -- I guess what, if anything, this Consulting

15 Agreement had to do with the Companion Agreement we

16 just discussed?

17 MR. STONEROCK: Objection, calls for a legal

18 conclusion, calls for attorney work product, calls

19 for attorney-client communication.

20 If you have an understanding, Sean, based on

21 anything other than correspondence with counsel,

22 you can answer.

23 THE WITNESS: No, sir.

24 BY MR. PHILLIPS:

25 Q Okay. Do you know if this was offered to you

Page 160

1 as a part of the attempt to get Omarosa -- strike that.

2 Do you know if this was presented to Omarosa

3 Manigault Newman as an attempt to get her back involved

4 with the campaign?

5 A Every person that was involved with the

6 campaign signed an NDA.

7 Q Okay.

8 A So if she was asked to come back to the

9 campaign, this would have been a document that she

10 would sign.

11 MR. STONEROCK: Sean, he's asking you about a

12 different agreement, which is -- which is on the

13 screen now. Can you see it?

14 THE WITNESS: Oh. Correct. Okay.

15 MR. STONEROCK: Do you need him to -- you

16 know, if you need time to review it or you need him

17 to --

18 MR. PHILLIPS: Sure.

19 MR. STONEROCK: -- make it larger on the

20 screen, just let us -- let him know, and I'm sure

21 he'll do it for you.

22 THE WITNESS: It would be the standard

23 Consulting Agreement.

24 BY MR. PHILLIPS:

25 Q Okay. And that would be the \$15,000 per month

Page 161

1 offered to consultants by the campaign at that time?

2 MR. STONEROCK: Objection, misstates his

3 testimony, calls for speculation, lacks foundation.

4 BY MR. PHILLIPS:

5 Q Were other consultants offered a rate of

6 \$15,000 a month to consult with the campaign?

7 MR. STONEROCK: Vague as to time, relevance.

8 You can answer, Sean, if you know.

9 THE WITNESS: Are you asking if there were

10 other individuals that were paid \$15,000 a month

11 for the campaign?

12 BY MR. PHILLIPS:

13 Q As a consultant to the campaign around that

14 same time.

15 A Well, at that same time there was a very

16 limited amount of people working with the campaign.

17 Throughout time, yes.

18 Q Do you know why -- I'll put it this way. Do

19 you know why these -- these agreements are unsigned by

20 Omarosa Manigault Newman?

21 MR. STONEROCK: Calls for speculation, lacks

22 foundation.

23 You can answer, Sean, if you know.

24 THE WITNESS: I don't know.

25 BY MR. PHILLIPS:

Page 162

1 Q Okay. Do you know if she accepted a

2 reemployment with the campaign?

3 A I -- I did hear -- overhear that she did,

4 and then I was told she didn't.

5 Q Okay.

6 A But the context of it, no.

7 Q Have you ever heard the recorded phone call --

8 a recorded phone call between Lara Trump and Omarosa

9 Manigault Newman about this issue?

10 A Heard about the phone call or heard the phone

11 call, sir?

12 Q Either. So let's do heard about.

13 A Heard about, yes.

14 Q How did you hear about it?

15 A Like I said, there was a very limited amount

16 of people on the campaign, so I overheard Lara Trump

17 talking about it.

18 Q Okay. Did you hear the phone call? I believe

19 it was released to the media, is why I asked.

20 A No, sir.

21 Q Okay. 22, video. Let's go there.

22 (Playing video:)

23 LARA TRUMP: My sister-in-law, Ivanka Trump,

24 is an exceptional advocate for President Trump

25 and his policies, especially those empowering women

Page 163

1 and families across the country.

2 Her command of the issues and policies

3 improving the lives of millions of Americans was

4 evident when Ivanka participated in the UN General

5 Assembly in New York City and the Concordia Summit.

6 IVANKA TRUMP: A tax reform, obviously. Tax

7 reform is arising tideless all ships. And I think

8 what we're seeing in terms of economic growth,

9 women's unemployment is at the lowest level in 65

10 years, which is remarkable in and of itself.

11 But I think if you look at the personal side

12 of -- of tax reform and -- and what it's done for

13 working parents, which people will especially feel

14 next year as they fill out their tax forms, it --

15 it really recognizes the reality that -- that most

16 parents have to deal with, particularly single

17 parents, which are disproportionately women, so

18 doubling the child tax credit.

19 LARA TRUMP: In addition to the empowerment of

20 women through President Trump's unprecedented

21 economic record, Ivanka addressed the ways that the

22 administration is providing for the workforce of

23 tomorrow through education initiatives.

24 IVANKA TRUMP: And so the president very early

25 on prioritized for Secretary DeVos STEM education

Page 164

1 and computer science education. Simultaneously, he

2 made available a minimum of \$200 million in annual

3 grant funding to the states for computer science

4 education. And the guidance specified that that

5 grant funding had to strongly consider gender

6 and racial diversity because that is -- is a

7 problem, particularly getting -- getting younger

8 girls and minorities involved in -- in -- in STEM

9 education and STEM fields.

10 LARA TRUMP: President Trump is leading by

11 example, demonstrating his personal commitment to

12 the advancement of women by promoting women to

13 numerous senior level positions throughout his

14 administration.

15 And among his most senior advisors, Ivanka

16 Trump serves the president and the country with

17 honor, delivering a positive impact on women

18 and families throughout the nation.

19 (End of video.)

20 (Respondent's Exhibit 22 was identified and

21 later marked for identification.)

22 BY MR. PHILLIPS:

23 Q Do you know where campaign ad number 22 was

24 aired?

25 A I believe that was one that was digitally ran.

Page 165

1 Q Okay. And was there anything in there that
 2 was specifically countermessaging to anything Omarosa
 3 Manigault Newman said?
 4 MR. STONEROCK: Objection, vague and ambiguous
 5 as to specifically and countermessaging, incomplete
 6 hypothetical, calls for speculation, lacks
 7 foundation.
 8 You can answer, Sean.
 9 THE WITNESS: Just the same as before.
 10 BY MR. PHILLIPS:
 11 Q To repeat, before there was a general
 12 narrative about Donald Trump and sexism, and these
 13 commercials were designed to counteract that narrative;
 14 is that fair?
 15 A That there were -- yes, there was a narrative
 16 in that -- in part Omarosa's narrative, public
 17 narrative, of what she said.
 18 Q Can you identify what part? Teeny-tiny or
 19 huge?
 20 A What part of the ad or --
 21 Q What part -- what part did she contribute to
 22 that narrative?
 23 A I don't think I could come up to a full part.
 24 I don't have that position.
 25 Q Okay. You would be speculating to figure out

Page 166

1 what part she played in that overall narrative;
 2 correct?
 3 A From the information provided me, yes.
 4 Q Okay. Do you know what part Donald Trump
 5 played into the narrative that he indeed was a sexist,
 6 or had sexist tendencies?
 7 MR. STONEROCK: Objection, calls for
 8 speculation, lacks foundation, argumentative.
 9 You can answer it if you know, Sean.
 10 THE WITNESS: I do not.
 11 BY MR. PHILLIPS:
 12 Q Okay. 23, second to last.
 13 (Playing video:)
 14 JACK BREWER: I was a big Obama supporter.
 15 It's okay to be an Obama and a Trump supporter
 16 because President Trump literally created the best
 17 job market and economy for black Americans
 18 and Americans of all races.
 19 Joe Biden's America was mass incarcerating
 20 black men. President Trump set them free.
 21 President Trump believes in rehabilitation, not
 22 just incarceration. He wants everyone in America
 23 to have the opportunity towards success. That's
 24 the type of president that we need.
 25 DONALD J. TRUMP: I'm Donald J. Trump and I

Page 167

1 approve this message.
 2 (End of video.)
 3 (Respondent's Exhibit 23 was identified and
 4 later marked for identification.)
 5 BY MR. PHILLIPS:
 6 Q And I think we've covered -- anything in that
 7 one that you can see is specifically countering any
 8 messaging by Omarosa Manigault Newman?
 9 MR. STONEROCK: Objection, vague and ambiguous
 10 as to specifically and countering any message.
 11 You can answer, Sean, if you have an opinion.
 12 THE WITNESS: I don't have an opinion.
 13 BY MR. PHILLIPS:
 14 Q There was a Fox News article dated June 15,
 15 2020 where Jack Brewer, the subject of that commercial,
 16 says it was disturbing for Biden to call Trump a
 17 racist.
 18 Would news media, including Fox News media,
 19 have also been a part of the narrative of whether or
 20 not Trump was a racist?
 21 MR. STONEROCK: Calls for speculation, lacks
 22 foundation, incomplete hypothetical, vague as to
 23 time.
 24 You can answer, Sean.
 25 THE WITNESS: I don't -- I don't really have a

Page 168

1 comment on it.
 2 BY MR. PHILLIPS:
 3 Q Okay. But if Fox News was broadcasting
 4 conversations with Jack Brewer about Trump being a --
 5 whether or not Trump was a racist, and actually
 6 defending him that he's not a racist, wouldn't that
 7 have continued the narrative even as late as June of
 8 2020 that there was this discourse in America about
 9 whether or not Trump was a racist?
 10 MR. STONEROCK: Calls for speculation, lacks
 11 foundation, incomplete hypothetical.
 12 You can answer.
 13 THE WITNESS: I -- I believe he was saying
 14 that he wasn't a racist; correct?
 15 BY MR. PHILLIPS:
 16 Q Correct. I think he was saying Biden was
 17 saying he was a racist, the president now, the
 18 president, candidate at the time.
 19 But, again, I'm -- is there a way to determine
 20 how much Biden's comments about whether or not Trump
 21 was a racist warranted, you know, commercials by the
 22 campaign on -- you know, featuring African Americans
 23 saying Donald Trump's not racist?
 24 MR. STONEROCK: Calls for speculation, lacks
 25 foundation, incomplete hypothetical.

Page 169

1 You can answer, Sean.

2 THE WITNESS: Biden at the time was Candidate

3 Biden, so any type of negative attack on the

4 campaign would have -- I mean, he would have been

5 the one giving negative attacks on the campaign,

6 so . . .

7 BY MR. PHILLIPS:

8 Q Last but not least, at least the ones produced

9 to me last night, was candidate ad --

10 MR. STONEROCK: It wasn't last night, John.

11 It was yesterday afternoon.

12 MR. PHILLIPS: The day before -- yeah,

13 yesterday. I didn't get to them until last night

14 because I was out of town.

15 (Playing video:)

16 UNKNOWN SPEAKER: To me Trump is a freaking

17 godsend. To me Trump is what is -- is -- is life.

18 To me Trump is a second chance. So when you say

19 he's -- he's uh, I'm, like, naw, dude, he's way

20 more than that, he's way more than that.

21 You see, I -- I don't have the luxury to worry

22 about freaking Rowe versus Wade. I have no -- I

23 don't have the luxury to worry about that. I'm too

24 busy trying to keep my family fed to think about

25 that. And for the first goddamn time in my life, I

Page 170

1 actually see a way out, I see a way out. Something

2 I've never seen before. I see a way out, man.

3 And just that little bit of hope is enough for

4 me to have a fire in my belly powerful to freaking

5 charge the goddamn world, man. I'm ready to take

6 over. But if Biden gets in office, man, I don't

7 know what I'm gonna do.

8 So I'm saying thank you to you because you

9 unlocked me, and I'm sure you unlocked a lot of

10 people. There is a silent majority out there, man.

11 I talk to them every day.

12 I just came out of -- I went to an -- I work

13 for mostly Arabs. Right? I went to an Arab

14 place -- right -- and I asked him: Who -- who are

15 you voting for, you know, that's safe?

16 And he said: Trump.

17 And I was like, I could have hugged him so

18 hard.

19 And he's like: Hey (makes noises).

20 And I was like: I'm sorry. I'm just so

21 excited to hear you say that because I was nervous,

22 because all I see is Biden signs everywhere I go.

23 And I'm like, please, Lord, don't let this guy win.

24 You know what I'm saying?

25 But there is a silent majority out there. I

Page 171

1 talk to them. They're workers like me who didn't

2 care about politics. They didn't even think about

3 politics. They didn't even want to talk about

4 politics.

5 I've got -- I've got people that I work with

6 on a daily basis saying: Yo, man, we gotta do

7 something.

8 Thank you, man. Thank you for unlocking me.

9 Thank you for unlocking other people. Because had

10 I stayed asleep, ain't no telling what would have

11 happened, man. Ain't -- ain't no telling. I just

12 want to say thank you, man.

13 I know this video is long as hell, but I

14 needed to show you this so you can see this is what

15 I'm fighting for, just to be able to take care of

16 my family. I'm fighting for my family. I'm voting

17 for my family.

18 DONALD J. TRUMP: Go to the voting booth

19 and vote early and in person. Don't let them take

20 your vote away. The most important election we've

21 ever had. Thank you.

22 (End of video.)

23 (Respondent's Exhibit 24 was identified and

24 later marked for identification.)

25 BY MR. PHILLIPS:

Page 172

1 Q Was that ad paid for by Donald J. Trump for

2 President?

3 A Yes.

4 Q Okay. It says that in the ad.

5 And do you know where that was featured or

6 promoted or aired?

7 A Digital.

8 Q Do you know where digital?

9 A YouTube.

10 Q Okay. Did that ad strike -- I mean, again,

11 it -- was that ad racist? Do you have an opinion as to

12 whether that ad was racist?

13 A Was the ad racist?

14 Q Yeah.

15 A No, sir.

16 Q Or did the individual in the ad express

17 racially insensitive views as paid for by Donald J.

18 Trump for President?

19 MR. STONEROCK: Objection, argumentative.

20 You can answer.

21 THE WITNESS: No, sir.

22 BY MR. PHILLIPS:

23 Q Okay. Did we refer -- okay.

24 Did -- did Donald J. Trump for President

25 really pay for an ad that -- that used the Lord's name

Page 173

1 in vain twice?

2 MR. STONEROCK: Objection, argumentative,
3 irrelevant, misstates the video.

4 BY MR. PHILLIPS:

5 Q Did you hear goddamn twice in that video?

6 A Are you asking me, sir?

7 Q Yeah.

8 A I heard once, but I didn't hear the second
9 time.

10 Q I mean, I can replay it. Once or twice.

11 A It's really not necessary.

12 Q Was there -- I mean, do you know whether you
13 lost votes or the Trump campaign lost votes because
14 you're paying to air an add that uses the Lord's name
15 in vain?

16 MR. STONEROCK: Objection, argumentative,
17 irrelevant, calls for speculation, lack of
18 foundation, incomplete hypothetical.

19 You can answer, Sean, if you know.

20 THE WITNESS: I do not know.

21 MR. PHILLIPS: Let's do this. We've gone a
22 while. I'm gonna try to get coordinated to end.
23 I've still got, you know, a couple of sections
24 left. But, you know, my intention is to not go,
25 you know, past -- past 4:00 or 5:00 o'clock. We'll

Page 174

1 get where we're -- where we're gonna get.

2 But let's take a break until 2:00, and that
3 will speed me up so that you're not waiting on me
4 to get ready for the next section; is that fair?

5 MR. STONEROCK: So it's 1:00 o'clock now?

6 MR. PHILLIPS: 1:50.

7 MR. STONEROCK: Oh. So you want a 10-minute
8 break?

9 MR. PHILLIPS: A 10-minute break.

10 MR. STONEROCK: Yeah, yeah, that's fine with
11 me.

12 Sean?

13 THE WITNESS: Sounds good.

14 MR. PHILLIPS: Okay. We'll see y'all about
15 right at 2:00.

16 MR. STONEROCK: Okay.

17 (Break from 1:50 p.m. to 2:00 p.m.)

18 MR. PHILLIPS: If we're ready, we'll get back
19 on at 2:00 o'clock.

20 BY MR. PHILLIPS:

21 Q Mr. Dollman, I lost my cheat sheet, so, sorry.
22 Did -- was there a complaint made with the
23 FEC, the Federal Election Commission, related to
24 American Made Media Consultants that worked with the
25 campaign?

Page 175

1 MR. STONEROCK: Objection, relevance.
2 You can answer, Sean.

3 THE WITNESS: Yes, sir.

4 BY MR. PHILLIPS:

5 Q Do you know what the status of that complaint
6 is?

7 MR. STONEROCK: Same objection.

8 BY MR. PHILLIPS:

9 Q Do you know what the current status of that
10 complaint is?

11 A What do you -- I mean, it's still in process,
12 sir.

13 Q What is Jared Kushner's involvement with AMMC?

14 MR. STONEROCK: Objection, relevance, calls
15 for speculation, lacks foundation.

16 John, what's the relevance of this to -- to
17 any claimed defense in the litigation? Because, I
18 mean, obviously there's an FEC complaint pending,
19 so you can understand how I would be reluctant to
20 allow Sean to testify about it. So I don't know --

21 MR. PHILLIPS: I'm not -- I'm not getting into
22 the complaint. There -- there -- you know, it's
23 our standpoint that anything going into the
24 election -- and there was media -- negative media
25 from July to December of 2020 regarding

Page 176

1 improprieties within the campaign related to --

2 MR. STONEROCK: Somebody is scratching. Sorry
3 to interrupt, John. I don't know what that is.

4 MR. PHILLIPS: It might have been my paper.
5 Sorry.

6 It goes as to improprieties related to the
7 campaign, negative press related to the campaign.
8 Again, I'm kind of guessing at what the damages are
9 gonna be or how they're gonna be assessed.

10 But to me, to us, all of the negative
11 publicity that went into the campaign led to the
12 ultimate defeat of Donald Trump, and you can't
13 piece out what Omarosa said on -- on a Tuesday as
14 the ultimate reason Donald Trump lost.

15 And so when we're getting into impropriety,
16 whether it's the Mueller investigation, whether
17 it's the double impeachment, whether it's Ukraine,
18 or whatever -- and I'm not getting into all that --
19 but it's -- it's how we've never really been able
20 to figure out how breach turns to damages here.

21 MR. STONEROCK: Yeah. Well, what does -- what
22 does Jared Kushner's involved with American Made
23 Media have to do with any of that?

24 MR. PHILLIPS: Well, the -- as I understand
25 it -- and this is what I'm not planning on getting

Page 177

1 much into -- but as I understand it, the argument
 2 is that American Made Media was a shell corporation
 3 and was actually paying contracts, like the one
 4 offered to Omarosa Manigault Newman, of \$15,000 a
 5 month. At least that's what the articles in front
 6 of me say, that it was used as a slush fund,
 7 including paying Lara Trump and others as a -- as a
 8 conduit that it avoided the FEC public records
 9 disclosures. So it certainly ties directly related
 10 to this case.

11 My question was fairly simple, because I don't
 12 want to get into the end of that complaint or
 13 Fifth Amendment stuff. You know, it was a -- it
 14 was a precursor question about, you know, what was
 15 Jared Kushner's involvement with AMMC on the
 16 surface level.

17 MR. STONEROCK: I still don't understand the
 18 relevance. You know, I -- I -- I'm happy to go off
 19 the record. John, I wouldn't normally do this
 20 while a question is pending. But I just want to
 21 make sure this doesn't involve anything that
 22 relates to the FEC complaint --

23 MR. PHILLIPS: Yes.

24 MR. STONEROCK: -- because I'm not handling
 25 that matter. Do you want me to go --

Page 178

1 MR. PHILLIPS: Sure.

2 MR. STONEROCK: Okay. So let's -- let's go --
 3 let go off the record, and then I'll -- I'm gonna
 4 get --

5 MR. PHILLIPS: Did you mute?

6 THE WITNESS: I think you muted early, Ryan.

7 MR. STONEROCK: Oh, I muted too soon.

8 So I'm going to go off the record. Sean, can
 9 you do the same? And then just, you know, turn
 10 your video and your -- and mute your -- your audio
 11 and we can discuss it.

12 And we'll be right back, John.

13 MR. PHILLIPS: Well, hold on. Let's do this.
 14 Let me -- let me kind of proffer my questions, if
 15 you will, so we're not doing this again.

16 MR. STONEROCK: Okay. Great.

17 MR. PHILLIPS: My questions, essentially, will
 18 be, you know, what role, if any, did -- did Jared
 19 Kushner have with AMMC? Was there a conversation
 20 related to who was gonna pay Omarosa \$15,000 a
 21 month? And then, essentially, one that
 22 acknowledges for Mr. Dollman that he's been a part
 23 of -- I think we're calling it a narrative, a
 24 negative narrative, related to Donald Trump that --
 25 that existed prior to election day.

Page 179

1 Those are, basically, the three things.

2 MR. STONEROCK: Okay. So give us two minutes.

3 MR. PHILLIPS: Okay.

4 MR. STONEROCK: Thank you.

5 (Break from 2:06 p.m. to 2:08 p.m.)

6 MR. STONEROCK: All right. Was that quick
 7 enough, John? I think Sean's coming back right
 8 now.

9 MR. PHILLIPS: Yes. Great.

10 MR. STONEROCK: Okay. So you can go ahead
 11 and ask those three questions, John.

12 MR. PHILLIPS: Okay.

13 BY MR. PHILLIPS:

14 Q Hi, Mr. Dollman.

15 A Hello.

16 Q What -- what -- what role, if any, did Jared
 17 Kushner have with AMMC?

18 MR. STONEROCK: Objection, relevance.
 19 You can answer, Sean.

20 THE WITNESS: My -- my fault, Ryan. I jumped
 21 over you.

22 He did not have a role in AMMC.

23 BY MR. PHILLIPS:

24 Q Okay. There's an article that states that he
 25 approved the creation of AMMC, and spent half of the

Page 180

1 campaign's \$1.26 billion war chest. And I understand
 2 this may need lead to a side conversation. But do you
 3 dispute the veracity of that statement?

4 MR. STONEROCK: Objection, relevance.

5 THE WITNESS: I believe there's been a lot of
 6 false reporting about AMMC.

7 BY MR. PHILLIPS:

8 Q Okay. Lara Trump and Mike Pence's -- is it
 9 nephew or son John Pence?

10 A Well, it's also part of that article that is
 11 false. It is his nephew.

12 Q It is his nephew?

13 A So credibility.
 14 It's his nephew.

15 Q Okay. I thought -- I thought you told me son.
 16 You may -- you may have said nephew earlier.

17 MR. STONEROCK: He said nephew.

18 MR. PHILLIPS: Okay. Very good.

19 THE WITNESS: The article says son.

20 BY MR. PHILLIPS:

21 Q This one I'm looking at says nephew.

22 A Oh.

23 Q So -- which makes sense.
 24 But Lara Trump and John Pence appeared in a
 25 campaign ad produced by -- or distributed by AMMC; is

Page 181

1 that correct?

2 MR. STONEROCK: Objection, misstates his

3 testimony, vague and ambiguous as to produced

4 and distributed.

5 Sean, you can answer if you understand the

6 question.

7 THE WITNESS: Yes.

8 BY MR. PHILLIPS:

9 Q They -- and help me understand produced

10 and distributed. I don't want to put words in your

11 mouth. That commercial that I'm referring to that has

12 John Pence and Lara Trump, what was AMMC's role in it?

13 A Hiring the subcontractor to put the videos

14 together. That would be the production side of it,

15 obviously.

16 Q Okay.

17 A Also, to shoot the videos.

18 And then the digital placement would be the

19 platform that the ads ran on.

20 Q Okay. Do Lara Trump, John Pence, and yourself

21 serve as board members of AMMC?

22 MR. STONEROCK: Objection.

23 What's the relevance of this question, John?

24 This is not what you told -- told us you were gonna

25 ask.

Page 182

1 MR. PHILLIPS: Right. I said if y'all need to

2 go back off.

3 BY MR. PHILLIPS:

4 Q I'm -- I'm trying to understand -- and, again,

5 it's -- and the next question is the question that I

6 was gonna go back to. And let me just go there.

7 MR. STONEROCK: Your papers are scratching

8 like crazy, John.

9 MR. PHILLIPS: Sorry, sorry. It's because

10 it's right over my microphone.

11 BY MR. PHILLIPS:

12 Q Do you agree with me, Mr. Dollman, that --

13 that even your name has been associated in a negative

14 light prior to the election that the campaign was

15 focused on winning?

16 A I would say that there were negative articles

17 about an entity, yes.

18 Q Okay. Do you know what, if any, effect that

19 had on the results from the presidential election

20 involving Donald J. Trump?

21 MR. STONEROCK: Objection, calls for

22 speculation, lacks foundation.

23 You can answer, Sean.

24 THE WITNESS: I believe a lot of false

25 reporting influences an election, yes.

Page 183

1 BY MR. PHILLIPS:

2 Q Okay. Very good.

3 Have you ever read The Fifth Risk?

4 A No, sir.

5 Q Do you know if this had any effect on the

6 results of the presidential election?

7 MR. STONEROCK: Calls for speculation, lacks

8 foundation.

9 BY MR. PHILLIPS:

10 Q Do you know?

11 A No, sir.

12 Q Fire and Fury by Michael Wolff, do you know if

13 this had any effect on the results of the 2020

14 presidential election?

15 MR. STONEROCK: Same objection.

16 THE WITNESS: I do not, sir.

17 BY MR. PHILLIPS:

18 Q Fear by Mr. Bob Woodward, do you know if this

19 book had any effect on the results of the 2020

20 presidential election?

21 MR. STONEROCK: Same objection.

22 You can answer, Sean.

23 THE WITNESS: No, I don't. I -- no, I do -- I

24 do not know.

25 BY MR. PHILLIPS:

Page 184

1 Q Okay. Do you know in -- in -- in at least

2 related to Fear whether there's claims about Donald

3 Trump being a racist discussed in that book?

4 MR. STONEROCK: Calls for speculation, lacks

5 foundation.

6 THE WITNESS: Who -- who wrote Fear?

7 BY MR. PHILLIPS:

8 Q Bob Woodward.

9 A No --

10 Q Okay.

11 A -- I do not.

12 Q Boom, boom, boom. Okay. Let me go to Exhibit

13 25, I believe.

14 Can you see that, the document on the screen?

15 A No, sir. All I see is the folder with the --

16 Q Okay. That's what I was afraid of.

17 Let me go back out and go back to share my

18 desktop. I knew I should have taken one of those handy

19 dandy Zoom for lawyers classes. Desktop. Eric Rose

20 report. Expand.

21 Now can you see a document?

22 A Yes, sir.

23 (Respondent's Exhibit 25 was identified and

24 later marked for identification.)

25 BY MR. PHILLIPS:

Page 185

1 Q Okay. There are 298 comments, statements,
 2 publications, writings in a book by Omarosa Manigault
 3 Newman that she has been sued over.
 4 Do you know who keeps track of Omarosa's
 5 statements?
 6 MR. STONEROCK: Calls for speculation, lacks
 7 foundation, calls for attorney work product
 8 and attorney-client communication.
 9 You can know -- you can testify, Sean, to
 10 anything that's beyond any discussions with counsel
 11 or anything you learned from counsel.
 12 THE WITNESS: No, sir.
 13 BY MR. PHILLIPS:
 14 Q Okay. Can you see a page 21 with a -- with a
 15 number 1?
 16 A Yes, sir.
 17 Q For each of these statements, I'm gonna ask
 18 you a couple questions. I guess, let me start by doing
 19 this.
 20 Did you sign the same NDA as -- as Omarosa
 21 Manigault Newman?
 22 MR. STONEROCK: Calls for speculation, lacks
 23 foundation, relevance.
 24 You can answer, Sean.
 25 THE WITNESS: Yes, sir.

Page 186

1 BY MR. PHILLIPS:
 2 Q Okay. What is your understanding as to the
 3 prohibition in that NDA as it relates to disclosing
 4 confidential information?
 5 MR. STONEROCK: Objection, calls for a legal
 6 conclusion.
 7 Do you want to put the NDA in front of him,
 8 John, or --
 9 MR. PHILLIPS: Do you want the NDA? I was
 10 just asking for his understanding. But we can do
 11 that real quick. This would be Ms. Manigault
 12 Newman's NDA. I really wish -- I just did auto
 13 accept all requests, so you might be able to
 14 control it now if you get a . . .
 15 BY MR. PHILLIPS:
 16 Q But, you know, related to the NDA that -- that
 17 you signed, what's your understanding of a person's --
 18 a signatory, I guess, of -- of -- of that obligation to
 19 not disclose confidential information? What's your
 20 understanding? Not -- not -- not legal terms, but
 21 what -- what is your understanding of that obligation?
 22 MR. STONEROCK: Objection, calls for a legal
 23 conclusion. You can ask him for his understanding,
 24 but you're still asking him for a legal conclusion.
 25 Sean, you can testify if you have an

Page 187

1 understanding.
 2 THE WITNESS: I would think any -- I -- my
 3 theory is, like, if you have a question on the
 4 NDAs, you probably speak with legal counsel, so
 5 most of the time I would speak with legal counsel
 6 beforehand. But I also don't publicly discuss
 7 anything that was going on with the campaign.
 8 BY MR. PHILLIPS:
 9 Q Okay. What is your understanding -- and I'm
 10 looking at page 2, number 2, of the -- what is your
 11 understanding as it relates to you or it relates to the
 12 campaign about the No Disparagement clause in the
 13 subject agreement?
 14 MR. STONEROCK: Objection, calls for a legal
 15 conclusion.
 16 You can testify to your understanding, if you
 17 have one, Sean.
 18 THE WITNESS: I would say negative -- negative
 19 comments and disparaging the president, the family,
 20 or family members or company, obviously, publicly.
 21 So that would be my interpretation of that.
 22 BY MR. PHILLIPS:
 23 Q Okay. Now I'm going back to the summary of
 24 the statements. Have you -- what Ms. Omarosa -- Ms.
 25 Manigault Newman needs an understanding of is whether

Page 188

1 each of these statements is -- is -- is there a claim
 2 that she breached confidentiality or she breached the
 3 disparage language? Do you know as to that first
 4 statement whether the campaign contends Omarosa
 5 breached confidentiality, disparagement, or both?
 6 MR. STONEROCK: John?
 7 MR. PHILLIPS: Yes.
 8 MR. STONEROCK: A couple things. This is --
 9 where are you pulling this from? Because this is
 10 not -- I don't believe this is our statement of
 11 claim.
 12 MR. PHILLIPS: This is from Rose's -- this is
 13 from Rose's report.
 14 MR. STONEROCK: Oh, from Eric Rose's report.
 15 Okay. Got it.
 16 And then we produced to -- I believe, to the
 17 -- to -- to your office whether or not -- you know,
 18 a chart that says whether or not each statement --
 19 which provision each statement violates.
 20 So, I mean, I'm not sure you want to spend
 21 your time going through, you know, each one of
 22 these.
 23 MR. PHILLIPS: Okay.
 24 MR. STONEROCK: But, you know, I'd like to at
 25 least be able to put that statement in front of

Page 189

1 Sean so that, you know -- so that he can review it
 2 before he answers these questions.

3 MR. PHILLIPS: Maybe -- maybe -- maybe we'll
 4 do that because --

5 MR. STONEROCK: Because, I mean, you're asking
 6 him for a legal conclusion. And, you know, we've
 7 -- like I said, we've already given you, you know,
 8 which provision -- a chart with which provision we
 9 contend violates -- is violated by each of these
 10 statements. So I'm not sure that we need to go
 11 through this process, but . . .

12 BY MR. PHILLIPS:

13 Q Let me ask this. And this is the first time,
 14 and only time, I get to depose a representative of the
 15 campaign. So can you tell me, Mr. Dollman, how the
 16 comments in 1, number 1, damaged the campaign?

17 MR. STONEROCK: Objection, calls for a legal
 18 conclusion, calls for expert witness testimony,
 19 calls for attorney work product.

20 You can answer, Sean, if you -- if you have an
 21 opinion.

22 THE WITNESS: I mean, it was a part of the
 23 book -- right -- so it's a public facing, which is
 24 -- it also looks like it's in quotations. So those
 25 are statements made by the president, or, at the

Page 190

1 time, Donald Trump. So I would probably, in my
 2 mind, say it's against the NDA.

3 If that wasn't your question, John, I
 4 apologize.

5 BY MR. PHILLIPS:

6 Q That's okay.

7 My question was, how did it damage the
 8 campaign?

9 A Yeah. I mean, it -- it -- it looks like a --

10 MR. STONEROCK: Sorry, sorry. I was on mute.

11 Same objections, calls for -- calls for a
 12 legal conclusion, calls for attorney work product
 13 information, calls for the premature disclosure of
 14 expert witness testimony.

15 You can answer, Sean.

16 THE WITNESS: I mean, it -- it -- it looks
 17 like she's trying to label him as a -- as a sexist.

18 BY MR. PHILLIPS:

19 Q Are those comments very different from the --
 20 from the videos that I showed you where Donald Trump
 21 bragged about going and seeing women in -- in -- in a
 22 beauty contest, naked, and -- and judging them? I
 23 mean, how -- how -- why can -- how did it damage the
 24 campaign if Donald can say it but Omarosa cannot? Why
 25 does Omarosa's statement be the one that damages the

Page 191

1 campaign?

2 MR. STONEROCK: There are about three
 3 questions in there.

4 MR. PHILLIPS: Yeah, that last one is the
 5 operative question. Sorry.

6 BY MR. PHILLIPS:

7 Q How did -- how is it that Omarosa's statement
 8 is the one that damages the campaign and not Donald
 9 Trump's admission of similar statements?

10 MR. STONEROCK: Objection, misstates the
 11 record, misstates Mr. Trump's statements, calls for
 12 a legal conclusion, calls for expert testimony.

13 You can answer it, Sean, if you have an
 14 opinion.

15 THE WITNESS: Yeah, I think we've discussed it
 16 a few times that I am not a lawyer. So,
 17 personally, I would think that it -- it -- you
 18 know, she signed an NDA that -- that she would not
 19 be doing it and going out publicly and making these
 20 statements.

21 BY MR. PHILLIPS:

22 Q Okay. And whether or not she's in breach is
 23 a -- is a determination for lawyers in federal court.

24 Let me ask this. Did you read the federal
 25 court opinion that was issued by the Southern District

Page 192

1 of New York essentially invalidating one of these NDAs?
 2 Did you read that? It was issued yesterday.

3 A Are you asking me, sir? No, I didn't.

4 Q Okay. So the -- the -- the validity of it is
 5 separate. I just want to know, as the CFO of the
 6 campaign and former director of operations, how -- how
 7 any of the statements in 1 caused actual damages.

8 MR. STONEROCK: Objection, calls for a legal
 9 conclusion, calls for expert testimony.

10 You can answer, Sean, if you have an opinion.

11 THE WITNESS: No, I don't have an opinion.

12 BY MR. PHILLIPS:

13 Q Okay. The same for 2. And we can have
 14 standing objections. But my question is gonna be how
 15 did this statement cause damages? For each and every
 16 one of these --

17 MR. STONEROCK: Objection.

18 BY MR. PHILLIPS:

19 Q -- how did this statement cause damages?

20 MR. STONEROCK: Objection. I think it's
 21 unfair to take one statement out and -- and isolate
 22 it when you have an entire book and -- and many
 23 media appearances were that were made by Ms.
 24 Manigault Newman.

25 So I'm gonna object on vague and ambiguous

Page 193

1 grounds, legal conclusion, attorney work product,
 2 calls for expert testimony.
 3 BY MR. PHILLIPS:
 4 Q Number 2, how did that damage the campaign?
 5 MR. STONEROCK: Same objections.
 6 THE WITNESS: Am I -- am I able -- I -- I
 7 don't have an opinion on it.
 8 BY MR. PHILLIPS:
 9 Q Okay. Number 3, how did that damage the
 10 campaign?
 11 MR. STONEROCK: Same objections.
 12 THE WITNESS: No opinion.
 13 BY MR. PHILLIPS:
 14 Q Is the fact that Trump made no secret of his
 15 appreciation of beautiful women -- strike that. We'll
 16 address that later.
 17 Number 4, how did that damage the campaign?
 18 MR. STONEROCK: Same objections, calls for a
 19 legal conclusion, calls for attorney-client work
 20 product, and a premature disclosure of expert
 21 witness testimony.
 22 BY MR. PHILLIPS:
 23 Q You can answer, Mr. Dollman.
 24 A Yeah. I'm not the quickest reader, John. I
 25 apologize.

Page 194

1 Q Sorry, sorry, sorry.
 2 A I mean, there's a -- there's a lot of personal
 3 information about family in here. I think the damages
 4 to the campaign for this one, and then -- and then
 5 possibly others within the book, is -- like I said
 6 before, is Omarosa was more of a -- had more of a
 7 relation, or an inside relation, with Mr. Trump and the
 8 family, and this book in her eyes wanted to give
 9 credibility to any type of thought or -- or belief in
 10 individuals' minds.
 11 Q Right. And I understand that. And I'm just
 12 trying to figure out from a perspective of the CFO if
 13 there was any economic damage from such a discussion as
 14 number 4. And I don't mean to short summarize it, but
 15 it talks about Karen McDougal and Stormy Daniels, two
 16 names that involved, for that period, daily, weekly,
 17 you know, media consumption.
 18 And -- and, I guess, my question is how did --
 19 how can the campaign attribute Omarosa's statement in 4
 20 to damaging the campaign rather than something Stormy
 21 Daniels said or did?
 22 MR. STONEROCK: Objection, calls for a legal
 23 conclusion, calls for expert testimony, calls for
 24 attorney work product.
 25 You can answer, Sean, if you understand the

Page 195

1 question.
 2 THE WITNESS: I think all of it -- right --
 3 creates a -- some type of damages. And trying to
 4 get the pinpoint dollar amount that was attributed
 5 to an individual, or individuals, it is difficult.
 6 But that's why we ran the ads as well as -- that's
 7 part of the damages -- right -- so we had to run
 8 those ads in order to correct the narrative.
 9 BY MR. PHILLIPS:
 10 Q But did -- did -- do you recall Stormy Daniels
 11 talking about Donald Trump having a mushroom-shaped
 12 penis or that being released because of her book?
 13 MR. STONEROCK: Objection, relevance.
 14 BY MR. PHILLIPS:
 15 Q Do you recall that being out in public
 16 consumption?
 17 MR. STONEROCK: Vague as to public
 18 consumption.
 19 You can answer, Sean, if you remember.
 20 THE WITNESS: I do not.
 21 BY MR. PHILLIPS:
 22 Q But would Stormy Daniels' book and discussions
 23 about her intimate life with Donald Trump be the
 24 damages, or would saying we all know about Stormy
 25 Daniels be the damages? I don't understand.

Page 196

1 And what I'm trying to understand -- we get
 2 one shot at this. It's the only campaign rep I get,
 3 and I got the CFO, so the person that's -- or -- or at
 4 least the director of ops back at the time.
 5 What I'm trying to understand is, is there any
 6 way to put what was said in number 4 into a calculator
 7 and say: Yes, we were damaged because of Omarosa
 8 Manigault Newman because of this comment?
 9 MR. STONEROCK: Calls for speculation, lacks
 10 foundation, calls for a legal conclusion, calls for
 11 expert witness testimony.
 12 John -- John, we have an expert who you're
 13 going to get to depose who's going to testify to
 14 these issues. It's also vague as to the term
 15 "calculator."
 16 You can answer, Sean, if you understand the
 17 question.
 18 THE WITNESS: I -- I understand the question.
 19 I don't have the -- I'm not familiar with any
 20 polling that came out on or after the book or prior
 21 to, so I really don't have a comment on the
 22 damages --
 23 BY MR. PHILLIPS:
 24 Q Okay.
 25 A -- for the campaign.

Page 197

1 Q Legally, would Ms. Manigault Newman be allowed
 2 to pay for corrective ads in support of a candidate
 3 under the Federal Election Commission guidelines?
 4 MR. STONEROCK: Objection, calls for a legal
 5 conclusion.
 6 THE WITNESS: Say -- say that again, please,
 7 sir.
 8 BY MR. PHILLIPS:
 9 Q Is -- is there a maximum amount that a person
 10 can give a -- a presidential political campaign?
 11 MR. STONEROCK: Objection, calls for a legal
 12 conclusion.
 13 You can answer, Sean.
 14 THE WITNESS: Yes, sir.
 15 BY MR. PHILLIPS:
 16 Q What is that?
 17 A As an individual to the campaign directly,
 18 \$2,800 --
 19 Q Okay.
 20 A -- per election.
 21 Q My understanding of Mr. Rose's opinion is Ms.
 22 Manigault Newman's negative comments were given
 23 heightened veracity because of her relationship with
 24 the president, which is something similar to what
 25 you've said, and it would be Mr. Rose's recommendation

Page 198

1 that Ms. Manigault Newman pay for the corrective ads,
 2 corrective statements, so that voters may -- because
 3 voters may continue to all belief about the president
 4 as a result of her statements.
 5 Now, I say that just generally summarizing his
 6 opinion to ask how Ms. Manigault Newman would pay for
 7 hundreds of thousands of dollars of -- of
 8 advertisements and still be -- and the campaign and her
 9 still be compliant with Federal Election Commission
 10 standards?
 11 MR. STONEROCK: Objection, calls for a legal
 12 conclusion.
 13 You will have a chance to ask Mr. Rose about
 14 this, John.
 15 Obviously, the campaign's over. These ads
 16 have already been paid for. There's -- there's no
 17 ability for -- for Omarosa, or Ms. Manigault
 18 Newman, to pay for any ads at this point, if that's
 19 a component of damages.
 20 We're not -- and you can ask Mr. Rose about
 21 this. But as far as I understand it, you know, the
 22 campaign is not actually asking for her to pay for
 23 those ads. It wouldn't even be possible. It's a
 24 -- it's a claim and component of damages.
 25 MR. PHILLIPS: Okay.

Page 199

1 BY MR. PHILLIPS:
 2 Q Moving on to number 5: Donald was obsessed
 3 with the ratings -- I guess this is the campaign's
 4 words -- of The Apprentice. I've heard that when the
 5 members -- when the numbers declined, he became
 6 apoplec- -- apoplectic. Then he'd do an interview and
 7 say that the show was still number one. Sound
 8 familiar?
 9 How did that comment damage the campaign?
 10 MR. STONEROCK: Objection, calls for a legal
 11 conclusion, calls for expert testimony.
 12 This -- this comment was a part of a -- of a
 13 book, many, many comments of which are -- are --
 14 violated the NDA.
 15 I'm not sure where you're going here, John.
 16 But, you know, if you -- Sean, if you have a
 17 personal understanding how -- as to how this
 18 specific statement, number 5, damaged the campaign,
 19 you can testify to it.
 20 THE WITNESS: No, not this specific one. I
 21 think collectively, as a whole.
 22 BY MR. PHILLIPS:
 23 Q Even collectively -- even collectively, as a
 24 whole, what -- what specific damage did Omarosa
 25 Manigault Newman do collectively, adding in everything

Page 200

1 she's ever said negatively about Donald Trump, the
 2 Trump campaign, the Trump family, the Trump businesses,
 3 Pence businesses, whoever? What amount of dollars of
 4 damages has the campaign suffered?
 5 MR. STONEROCK: Calls for a legal conclusion,
 6 calls for expert testimony.
 7 You can answer, Sean.
 8 THE WITNESS: Yeah, collectively, like you
 9 said, there is a lot of public statements, John,
 10 that Omarosa said about the campaign, the family of
 11 Mr. Trump, Mr. Trump himself, and then, also,
 12 businesses or shows that he was on.
 13 Again, publicly she came out and said all
 14 that, so in turn we had to run ads that in part
 15 were because of her statements that gave more
 16 credibility to other news networks pushing a
 17 narrative.
 18 BY MR. PHILLIPS:
 19 Q Right. But at the exact same time you had an
 20 adult film star talking about the shape of Donald
 21 Trump's penis, you had lawsuits filed accusing Donald
 22 Trump of sexual assault or rape, you had an
 23 impeachment, you had the Mueller investigation, you had
 24 a host of other people, every network, saying,
 25 generally, something either negative about Trump or

Page 201

1 saying something rehabilitating the image of Trump.

2 And what I just want to know, is there one

3 dollar of damages that you can point to and say this

4 was because of something Omarosa Manigault Newman did

5 -- Manigault Newman did specifically?

6 MR. STONEROCK: Objection. That was a

7 compound question on many levels. Calls for a

8 legal conclusion, calls for expert testimony.

9 Sean, you can answer if you understand the

10 question.

11 Vague as to time as well. Sorry.

12 THE WITNESS: Yeah, I don't have a specific

13 dollar amount that would go to any statement.

14 BY MR. PHILLIPS:

15 Q Is there any way to get one?

16 A I would -- you know, to have the exact dollar

17 amount that was allocated to her public statements, I

18 -- I don't think it's possible to get an exact dollar

19 amount. But like Ryan was saying earlier, the expert

20 witness dove into it a little bit more, but it's

21 difficult to actually pull the exact dollar amount.

22 Q And I get that. And his deposition's next.

23 And I get -- I get the position and professionalism

24 with which -- with which you're, you know -- you're

25 sitting there and answering these questions. I get it.

Page 202

1 I appreciate it.

2 And I think you appreciate, you know, my job

3 as well, which is to try to figure out if I can put a

4 number and a calculator that Omarosa caused as damages

5 to the campaign, what -- what that number would be.

6 And is there any number that the campaign is -- the CFO

7 and former director of operations is aware of that was

8 specifically and only caused by Omarosa Manigault

9 Newman?

10 MR. STONEROCK: Objection, calls for a legal

11 conclusion, calls for expert testimony. You have

12 an entire expert report that calculates -- that

13 calculates that. I'm not sure where you're going

14 with this, John.

15 BY MR. PHILLIPS:

16 Q Anything, Mr. Dollman?

17 MR. STONEROCK: You can ask this in the

18 deposition coming up, but . . .

19 THE WITNESS: No. I think if we had a

20 calculator to do that, it would make all of our

21 lives a lot easier here.

22 BY MR. PHILLIPS:

23 Q Thank you.

24 I have -- that's 5. I've got 293 more of

25 these. And my intention was to go through each

Page 203

1 and every one of them and ask, essentially, two

2 questions: Does this fall under the confidentiality or

3 disparagement provisions of the agreement? And I'm --

4 I'm taking Mr. Stonerock's word that that's all in a

5 chart. I think there was some missing, but I don't --

6 I don't care at this point. We'll deal with that with

7 Mr. Rose.

8 MR. STONEROCK: John, can I just -- I got

9 information. It's in our interrogatory responses.

10 MR. PHILLIPS: Okay. And maybe I'll take a

11 break and pull that up. In fact, I think I have

12 those in my queue.

13 BY MR. PHILLIPS:

14 Q But, you know, I think the answer, Mr.

15 Dollman, that you've given me -- and I don't -- and,

16 again, I'm not trying to belabor this. I would much

17 rather have an hour less of questions. And I did the

18 math at 298 times two minutes, which it takes me longer

19 than two minutes and Ryan longer than two minutes to

20 have a question and an objection, you know, that's --

21 that's 500 minutes. That's more time than I have or

22 that we need to spend.

23 I say that to say is there -- is there any

24 comment that you're aware of that you could point to

25 that Omarosa said or published that has any specific

Page 204

1 damages that the campaign is aware of?

2 MR. STONEROCK: Objection, calls for a legal

3 conclusion, calls for expert testimony.

4 You can answer if you understand it.

5 THE WITNESS: I did -- so -- and like -- like

6 I said, an individual statement is difficult. But,

7 collectively, I did overhear, or was a part of,

8 kind of in the background, of a meeting that did

9 discuss putting out ads based off of these

10 comments. I don't have in front of me the -- which

11 ads, but I did overhear that discussion.

12 BY MR. PHILLIPS:

13 Q That there were ads needed as it relates to

14 Omarosa Manigault Newman?

15 A It was to correct the narrative, yes, sir.

16 Q Okay. And we don't know what ads or how much

17 were spent on those ads; is that fair?

18 A I -- I -- I'm trying to dig through my brain

19 on, like, when that time was, but I can't -- I could

20 probably try to pull something. But that's -- that's

21 fair to say as of right now I do not.

22 Q Do you know who was at that meeting?

23 A No, sir.

24 Q If Donald Trump cheated on Melania with Stormy

25 Daniels, would that make him an unfaithful husband?

Page 205

1 MR. STONEROCK: Calls for speculation, lacks
 2 foundation, incomplete hypothetical, argumentative,
 3 irrelevant.
 4 You can answer, Sean, if you know.
 5 BY MR. PHILLIPS:
 6 Q And I'm going to comment 32. Bear with me,
 7 Sean, before you answer. Nope. That's the problem
 8 with going off this report. Did Rose really do
 9 something to set them up? He claimed he did. Oh, here
 10 we go. He just put them in different categories.
 11 So 32, right here, under -- he has category 2.
 12 I've got to move my stuff to the page. Anyway, 32,
 13 there's a statement in -- allegedly in Omarosa's book:
 14 Melania, like Hillary, had an unfaithful husband
 15 exposed in a very public space. And it goes on. And
 16 it ends with: I don't think that Melania ever had an
 17 expectation that Donald was going to be faithful.
 18 Is this -- if -- if it's true that Donald
 19 Trump cheated with Stormy Daniels while she was --
 20 while he was married to Melania Trump, isn't the fact
 21 that he's an unfaithful husband a fact and not an
 22 opinion?
 23 MR. STONEROCK: Objection, calls for
 24 speculation, lacks foundation, incomplete
 25 hypothetical, argumentative, calls for a legal

Page 206

1 conclusion, vague and ambiguous as to fact versus
 2 opinion.
 3 You can answer, Sean, if you have an
 4 understanding of the question.
 5 THE WITNESS: Yeah, I think I understand the
 6 question. I don't -- I don't really have an
 7 opinion on it. I think it's all done just
 8 speculating on whether he was or wasn't. Right?
 9 So --
 10 BY MR. PHILLIPS:
 11 Q Okay.
 12 A -- I don't have an opinion on that.
 13 Q And do you know whether Omarosa had -- I mean,
 14 strike that.
 15 Do you know whether Donald Trump cheated on
 16 Melania Trump?
 17 MR. STONEROCK: Calls for speculation, lacks
 18 foundation, irrelevant.
 19 You can answer, Sean, if you know.
 20 THE WITNESS: No, sir.
 21 BY MR. PHILLIPS:
 22 Q Did Omarosa -- as you understand it, as -- as
 23 director of operations of the campaign, did Omarosa
 24 waive her First Amendment rights by signing the NDA?
 25 MR. STONEROCK: Objection, calls for a legal

Page 207

1 conclusion.
 2 You can answer, Sean, if you have an
 3 understanding.
 4 THE WITNESS: Yeah, I'm not -- I'm not a
 5 lawyer, and I don't know if she waived her First
 6 Amendment rights.
 7 BY MR. PHILLIPS:
 8 Q Are you aware of whether the subject NDA has
 9 been struck down by a federal court?
 10 MR. STONEROCK: Objection, calls for a legal
 11 conclusion, vague as to struck down, incomplete
 12 hypothetical.
 13 You can answer, Sean, if you know.
 14 THE WITNESS: I am not aware.
 15 BY MR. PHILLIPS:
 16 Q As of election day, do you know how many
 17 pending lawsuits Donald Trump had pending against him?
 18 MR. STONEROCK: Objection, relevance, calls
 19 for speculation, lacks foundation.
 20 You mean in his individual capacity, or
 21 official capacity, or both?
 22 MR. PHILLIPS: Both.
 23 THE WITNESS: No, sir.
 24 BY MR. PHILLIPS:
 25 Q Do you know how many arbitration proceedings

Page 208

1 the Trump campaign has ongoing?
 2 MR. STONEROCK: Objection, relevance, calls
 3 for a legal conclusion, calls for attorney work
 4 product information, calls for attorney-client
 5 communications.
 6 You can answer if you know, Sean.
 7 THE WITNESS: No, sir.
 8 BY MR. PHILLIPS:
 9 Q Do you know who Jessica Denson is?
 10 A Yes, sir.
 11 Q Who is Jessica Denson?
 12 A She was a former staffer on the campaign in
 13 2016.
 14 Q Did she make comments which damaged the
 15 campaign?
 16 MR. STONEROCK: Objection, relevance.
 17 John, this has nothing to do with our case.
 18 You know, I'll probably let -- let Sean answer this
 19 question if he -- if he knows. But I'm not gonna
 20 let you go down -- too much further down this road.
 21 MR. PHILLIPS: Because it's all Omarosa's
 22 fault until it's not; right? I mean, I'm just
 23 waiting for damages, Ryan.
 24 MR. STONEROCK: Can you rephrase or -- or
 25 repeat the question?

Page 209

1 MR. PHILLIPS: Yeah, yeah.

2 BY MR. PHILLIPS:

3 Q Did Jessica Denson damage Donald J. Trump for
4 President, Inc.?

5 MR. STONEROCK: Calls for speculation, lacks
6 foundation, calls for a legal conclusion, calls for
7 expert testimony, irrelevant, incomplete
8 hypothetical, vague as to time.

9 You can answer, Sean, if you have an
10 understanding.

11 THE WITNESS: She did have negative comments
12 publicly against the campaign and -- or Mr. Trump.

13 BY MR. PHILLIPS:

14 Q And what damages -- I guess what I'm trying to
15 understand is how can we differentiate between her
16 negative comments damaging the campaign and Omarosa's
17 negative comments damaging the campaign?

18 MR. STONEROCK: Same objections, calls for a
19 legal conclusion, calls for expert testimony,
20 incomplete hypothetical, calls for speculation,
21 lacks foundation.

22 You can answer, Sean, if you have an
23 understanding.

24 THE WITNESS: I don't have anything on that
25 one.

Page 210

1 BY MR. PHILLIPS:

2 Q Okay. Have you ever heard of Cliff Sims?

3 A Yes, sir.

4 Q Do you know how Cliff Sims' arbitration got
5 resolved?

6 MR. STONEROCK: Objection, relevance, calls
7 for a legal conclusion, calls for confidential
8 information.

9 I'm not gonna allow the witness to answer.
10 I'm gonna instruct the witness not to answer.

11 MR. PHILLIPS: Okay.

12 BY MR. PHILLIPS:

13 Q Do you know what damages were caused to the
14 campaign by Cliff Sims?

15 MR. STONEROCK: Calls for a legal conclusion,
16 calls for attorney work product, calls for expert
17 testimony, incomplete hypothetical.

18 Sean, you can answer if you know.

19 THE WITNESS: I do not, sir.

20 BY MR. PHILLIPS:

21 Q Do you know how you can differentiate from the
22 damages caused to the campaign by Cliff Sims from the
23 damages caused by the campaign -- to the campaign
24 allegedly by Omarosa Manigault Newman?

25 MR. STONEROCK: Vague and ambiguous as to

Page 211

1 differentiate, vague as to time, calls for a legal
2 conclusion, calls for expert testimony, calls for
3 attorney work product.

4 Sean, you can answer if you have an
5 understanding.

6 THE WITNESS: I am not familiar with Cliff --
7 Cliff Sims --

8 BY MR. PHILLIPS:

9 Q Okay.

10 A -- as well.

11 Q Do you know if Alva Johnson's arbitration
12 action is still going on?

13 MR. STONEROCK: Objection, relevance, calls
14 for a legal conclusion, calls for attorney work
15 product, calls for attorney-client communication.

16 Sean, if you have an understanding outside of
17 any correspondence you may have had with counsel,
18 then you can testify to it.

19 THE WITNESS: No, sir.

20 BY MR. PHILLIPS:

21 Q Okay. As of today, it looks like the campaign
22 has paid Harder, LLC \$4,7 -- \$4,078,295.20. Do you
23 know of that over \$4 million how many in attorney --
24 how much in attorneys' fees are attributed to Omarosa
25 Manigault Newman's case?

Page 212

1 MR. STONEROCK: Objection, relevance, calls
2 for attorney work product information, calls for
3 attorney-client communications.

4 I'm going instruct the witness not to answer.

5 MR. PHILLIPS: Okay.

6 BY MR. PHILLIPS:

7 Q The campaign has paid \$186,996.50 to the
8 American Arbitration Association. Do you know what
9 portion of that \$186,996.50 is attributable --
10 attributable to Omarosa Manigault Newman's arbitration?

11 MR. STONEROCK: Same objections.

12 John, you can find that information out from
13 AAA. It's not a difficult one.

14 I'm gonna instruct the witness not to answer.

15 MR. PHILLIPS: Okay.

16 BY MR. PHILLIPS:

17 Q As director of operations for Donald J. Trump
18 for President, Inc., were you aware of allegations of
19 sexual harassment or misconduct in the workplace at
20 Donald J. Trump for President, Inc.?

21 MR. STONEROCK: Objection, relevance.
22 Objection, calls for attorney work product
23 information, calls for attorney-client
24 communications, calls for confidential information
25 of employees and/or contractors of the campaign.

Page 213

1 I'm gonna instruct the witness not to answer.
 2 BY MR. PHILLIPS:
 3 Q Do you have any information as to why Ms.
 4 Manigault Newman's payroll or payments were withheld
 5 until she signed the subject NDA?
 6 MR. STONEROCK: Objection, misstates testimony
 7 in this case, misstates the record, argumentative,
 8 calls for speculation, lacks foundation.
 9 You can answer, Sean, if you understand the
 10 question.
 11 THE WITNESS: I think everybody on the
 12 campaign, whether -- if they were submitting an
 13 invoice, they had to have a signed contract and an
 14 NDA prior to being paid.
 15 BY MR. PHILLIPS:
 16 Q Okay.
 17 A I do know in her circumstances, I believe she
 18 was sending her invoices directly to the HR director
 19 and on a personal email, and I believe that might have
 20 tied some of it up.
 21 The other side of it is the campaign won't pay
 22 an invoice without a W-9. I know there was some issues
 23 with that more recent, not so much in 2016.
 24 So there's a whole bunch of factors of why an
 25 invoice would be held up.

Page 214

1 Q Have you had any conversations within anyone
 2 within the campaign that's not counsel regarding
 3 whether or not the subject employment agreements,
 4 nondisclosure and nondisparagement provisions, are
 5 enforceable or unenforceable under New York law?
 6 MR. STONEROCK: Objection, calls for work
 7 product -- attorney work product information, calls
 8 for attorney-client communications, calls for a
 9 legal conclusion.
 10 Sean, you can answer if you have had
 11 discussions with anyone other than counsel,
 12 including in-house counsel.
 13 THE WITNESS: No, sir.
 14 BY MR. PHILLIPS:
 15 Q Okay. Do you know how many people and
 16 entities are covered by the subject nondisclosure
 17 agreement?
 18 MR. STONEROCK: Calls for a legal conclusion.
 19 The document speaks for itself.
 20 Sean, you can answer if you know.
 21 THE WITNESS: I do not know the exact number,
 22 sir.
 23 BY MR. PHILLIPS:
 24 Q Okay. Do you know an approximate number?
 25 MR. STONEROCK: Same objections.

Page 215

1 THE WITNESS: I would probably say over 250.
 2 BY MR. PHILLIPS:
 3 Q Okay. Do you know if President Trump is
 4 affiliated with more than 500 companies?
 5 MR. STONEROCK: Calls for speculation, lacks
 6 foundation.
 7 THE WITNESS: I do not.
 8 BY MR. PHILLIPS:
 9 Q Okay. Do you know what people in Donald
 10 Trump's family are covered by the subject nondisclosure
 11 agreement?
 12 MR. STONEROCK: Calls for a legal conclusion,
 13 calls for speculation.
 14 You can answer if you have an understanding,
 15 Sean.
 16 THE WITNESS: No, sir.
 17 BY MR. PHILLIPS:
 18 Q Have you had conversations with anyone, not
 19 counsel, at the campaign -- campaign about whether the
 20 NDA covers campaign workers that left and actually went
 21 to work for the federal government?
 22 MR. STONEROCK: Objection, calls for a legal
 23 conclusion, calls for attorney work product
 24 information, calls for attorney-client
 25 communications.

Page 216

1 Sean, if you've discussed that with anybody,
 2 you know, other than counsel for the campaign,
 3 including in-house counsel, you can testify to
 4 that.
 5 THE WITNESS: No, sir.
 6 BY MR. PHILLIPS:
 7 Q Okay. Do you know -- personally, do you know
 8 anything about the relation -- the relationship Donald
 9 Trump had with Jeffrey Epstein?
 10 MR. STONEROCK: Objection, relevance,
 11 argumentative.
 12 You can answer, Sean, if you know.
 13 THE WITNESS: No, sir.
 14 MR. PHILLIPS: I forgot where I was.
 15 Probably, like, 26, 27, Beth. I have it. We can
 16 track it down.
 17 COURT REPORTER: I believe this is 26.
 18 MR. PHILLIPS: Okay. So Defendant's 26 will
 19 be a tweet dated August 31, 2019 from
 20 @realDonaldTrump.
 21 (Respondent's Exhibit 26 was identified and
 22 later marked for identification.)
 23 BY MR. PHILLIPS:
 24 Q Do you know who had access to post from
 25 @realDonaldTrump when it -- when he still had a Twitter

Page 217

1 account?

2 MR. STONEROCK: Objection, calls for

3 speculation, lacks foundation.

4 You can answer if you know.

5 THE WITNESS: No, sir.

6 BY MR. PHILLIPS:

7 Q Okay. The -- the statement says, "Yes, I am

8 currently suing various people for violating their

9 confidentiality agreements."

10 We're gonna stop there for purposes of my next

11 question. Do you know who else Donald Trump sued for

12 violating confidentiality agreements?

13 MR. STONEROCK: Calls for speculation, lacks

14 foundation, vague as to time, calls for attorney

15 work product, calls for attorney-client

16 communications.

17 You can answer if it's based upon anything you

18 learned from anything other than discussions with

19 counsel or correspondence with counsel.

20 THE WITNESS: No, sir.

21 BY MR. PHILLIPS:

22 Q Okay. Do you know who Louise Mensch is,

23 M-e-n-s-c-h?

24 A No, sir.

25 Q Do you know who Dexter Taylor is?

Page 218

1 A No, sir.

2 Q Have you ever seen a tweet by Dexter Taylor

3 that indicates Donald Trump lost his vote because of

4 the way he was treated while interning at the

5 Whitehouse?

6 A Besides the one you're showing me right now?

7 Q Right. That's a no?

8 A Yes, sir. No, I've never -- never seen it

9 before.

10 Q So for all the people who -- who we saw in

11 commercials of people who -- who said they -- they

12 voted for Trump -- strike that. Let me stop for a

13 second.

14 Have you done any investigation personally

15 about whether there is a tape in which Donald Trump

16 uses the N-word? Do you know -- well, first of all, do

17 you know what I mean by the N-word?

18 A Yes, sir.

19 Q Okay. Have you done any personal

20 investigation to determine if there's any recording of

21 Donald Trump using the N-word?

22 A No, sir.

23 Q Do you know whether or not that exists

24 definitively?

25 A No, sir.

Page 219

1 MR. PHILLIPS: Ryan, I'm probably wrapping up

2 in the next 20, 30 minutes, but let me take a break

3 for 10 minutes, and hopefully we can be done

4 and out of here by 4:00.

5 MR. STONEROCK: Sounds good.

6 MR. PHILLIPS: Okay.

7 (Break from 3:08 p.m. to 3:18 p.m.)

8 MR. PHILLIPS: Back on at 3:18.

9 BY MR. PHILLIPS:

10 Q Mr. Dollman, again, thank you for your

11 patience. I know this isn't easy, particularly in this

12 setting. I appreciate it. We're -- we're a few

13 minutes away from being done, at least, with my

14 questions. I assume that will wrap it up, but you

15 never know.

16 Have you had any conversations -- again, not

17 related to conversations with lawyers for the

18 campaign -- about the duration of the subject

19 nondisclosure agreement, how long it lasts?

20 MR. STONEROCK: Objection, calls for a legal

21 conclusion, calls for attorney work product, calls

22 for attorney-client communications.

23 You can answer if you had any discussions with

24 non-counsel, Sean.

25 THE WITNESS: No, I have -- I have never spoke

Page 220

1 with anybody else about the NDA.

2 BY MR. PHILLIPS:

3 Q Okay. Do you have an opinion about how long

4 it lasts?

5 MR. STONEROCK: Calls for a legal conclusion.

6 THE WITNESS: Yeah, I would -- I would think

7 it goes on forever.

8 BY MR. PHILLIPS:

9 Q Okay. Does it go on retroactively? Does it

10 cover statements made before you signed the NDA, in --

11 in your opinion?

12 MR. STONEROCK: Objection, calls for a legal

13 conclusion, incomplete hypothetical.

14 You can answer it if you have an opinion,

15 Sean.

16 THE WITNESS: Yeah, I'm not a lawyer. I -- I

17 am unsure on that one.

18 BY MR. PHILLIPS:

19 Q Okay. A few more questions. Prior to the

20 election in November of 2020, Treasury Secretary Steve

21 Mnuchin referred to Donald Trump as an idiot. Did that

22 damage the campaign?

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

24 calls for a legal conclusion, calls for expert

25 witness testimony, incomplete hypothetical.

Page 221

1 You can answer if you know, Sean.

2 THE WITNESS: I was -- I was unaware of that

3 comment.

4 BY MR. PHILLIPS:

5 Q Okay. Former Secretary of State Rex Tillerson

6 is attributed to calling Donald Trump a moron. Are you

7 aware of that comment?

8 MR. STONEROCK: Same objections.

9 THE WITNESS: No, sir.

10 BY MR. PHILLIPS:

11 Q Would the secretary of state calling the

12 President of the United States a moron damage his

13 chances of reelection?

14 MR. STONEROCK: Calls for speculation, lacks

15 foundation, incomplete hypothetical, calls for

16 expert testimony.

17 You can answer, Sean, if you know.

18 THE WITNESS: I do not know.

19 BY MR. PHILLIPS:

20 Q Former top economic adviser Gary Cohn,

21 C-o-h-n, was publicly attributed as saying Donald Trump

22 was dumb as shit. Were you aware of that comment?

23 MR. STONEROCK: Same objections.

24 THE WITNESS: No, sir, I was not aware of that

25 comment.

Page 222

1 BY MR. PHILLIPS:

2 Q Would an economic adviser calling the

3 president he was working under dumb as shit damage a

4 chance for reelection?

5 MR. STONEROCK: Same objections.

6 THE WITNESS: Yeah, I don't have an opinion on

7 that, John.

8 BY MR. PHILLIPS:

9 Q Okay. National security adviser H. R.

10 McMaster mocked Donald Trump's intelligence by calling

11 him an idiot and a dope, with the intelligence of a

12 kindergartner. Were you aware of those comments?

13 A No, sir.

14 Q Would comments such as that from a national

15 security adviser under a president affect a president's

16 chance of being reelected?

17 MR. STONEROCK: Calls for a legal conclusion,

18 calls for speculation, lacks foundation, incomplete

19 hypothetical, calls for expert testimony.

20 You can answer if you know, Sean.

21 THE WITNESS: I do not know, sir.

22 BY MR. PHILLIPS:

23 Q Former Whitehouse chief of staff John Kelly

24 said -- is attributed as saying we've got to save

25 Donald Trump from himself. Were you aware of a comment

Page 223

1 that -- that John Kelly is attributed as saying that

2 we've got to save him from himself?

3 A No, sir.

4 Q Would comments from the president's chief of

5 staff saying we've got to save him from himself affect

6 his chances of reelection?

7 MR. STONEROCK: Incomplete hypothetical, calls

8 for speculation, lacks foundation, calls for a

9 legal conclusion, calls for expert testimony.

10 You can answer, Sean, if you know.

11 THE WITNESS: I do not know.

12 BY MR. PHILLIPS:

13 Q Do you know how many members of the -- I guess

14 how many leaders -- strike that.

15 Do you know how many management-level

16 positions within the Trump campaign -- strike that.

17 It's getting long -- it's getting late.

18 Who from Donald J. Trump for President, Inc.

19 was indicted, if anybody?

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

21 relevance.

22 You can answer if you know.

23 THE WITNESS: I don't have that information.

24 BY MR. PHILLIPS:

25 Q Okay. Were you aware if Paul Manafort was

Page 224

1 indicted?

2 A Oh. Yes, sir.

3 Q What effect would the indictment of a campaign

4 manager or an executive within a campaign have on

5 public confidence related to the reelection of that

6 president?

7 MR. STONEROCK: Objection, incomplete

8 hypothetical, vague as to public confidence, calls

9 for an expert opinion, calls for a legal

10 conclusion, calls for speculation, lacks

11 foundation.

12 You can answer if you know, Sean.

13 THE WITNESS: I do not know, sir.

14 BY MR. PHILLIPS:

15 Q Okay. Is there any way to attribute --

16 and this is the same but different. Is there any way

17 to attribute damages to Omarosa Manigault Newman

18 and not top executives within the campaign and top

19 cabinet-level officials either getting arrested,

20 indicted, or calling Mr. Trump a moron or an idiot, is

21 there any way to differentiate which one caused the

22 campaign damages?

23 MR. STONEROCK: Objection, compound, calls for

24 a legal conclusion, calls for expert testimony.

25 Sean, you can answer if you have an

Page 225

1 understanding.

2 THE WITNESS: I believe the comments -- I

3 mean, just to have the difference in comments. One

4 is claiming racism and sexist -- right -- and the

5 other ones are to his intelligence.

6 So if we were able to we could probably pull,

7 like we did, the information or, like, the ads that

8 we actually spent money on that were attributed to

9 trying to correct the narrative that Omarosa

10 publicly said about the president.

11 And, I mean, we spent, like 17, 18 million on

12 just ads that were kind of -- or that were with

13 that narrative -- right -- trying to correct that

14 narrative.

15 BY MR. PHILLIPS:

16 Q Right. And -- and -- and I think we've

17 discussed this rather at length and candidly that it is

18 the campaign's contention that Omarosa said -- or

19 characterized Donald Trump as a racist and a sexist,

20 but so did news media and so did many others. And I'm

21 -- I'm -- I'm back to the question, based upon your

22 answer, that is there any way to differentiate which

23 caused the campaign damages?

24 MR. STONEROCK: Calls for a legal conclusion,

25 calls for expert testimony.

Page 226

1 You can answer if you have an understanding,

2 Sean.

3 THE WITNESS: I -- I understand the question.

4 I'm -- again, I'm not the expert in it, and I would

5 probably go off of the expert's opinion and what he

6 wrote up, he or she.

7 BY MR. PHILLIPS:

8 Q And let me finish here. You know, all the

9 stuff we've discussed, all the clips we've played,

10 isn't it -- NDA aside, but isn't it fair to have an

11 opinion that Donald Trump is sexist?

12 MR. STONEROCK: Objection, vague as -- as to

13 the term "fair," calls for a legal conclusion,

14 calls for speculation, lacks foundation, incomplete

15 hypothetical.

16 You can answer, Sean, if you understand.

17 THE WITNESS: I think it's one thing to have

18 an opinion, and it's another thing to go out

19 and write a book and publicly speak negative about

20 someone's family and private issues.

21 BY MR. PHILLIPS:

22 Q Understood.

23 Absent -- assuming the NDA doesn't exist,

24 wouldn't that -- and, again, I don't -- I know it's

25 coming, I'm not a lawyer. But I guess, you know,

Page 227

1 I'm -- I'm -- I'm trying to figure out where -- where

2 that First Amendment lies. And we're not allowed to

3 infringe on -- on people's opinions, but -- strike

4 that.

5 We get it. I don't want to go all the way

6 down that road again and have Ryan have to assert six

7 more objections. Let's see if I can wrap it up.

8 MR. STONEROCK: Thank you, John. I appreciate

9 that.

10 MR. PHILLIPS: That darned old First

11 Amendment.

12 Mr. Dollman, Mr. Stonerock, I'm done. Thank

13 you for your time.

14 THE WITNESS: Thank you, sir.

15 MR. STONEROCK: Thank you, John. Good

16 afternoon, good night.

17 MR. PHILLIPS: All right. Talk to you soon.

18 MR. STONEROCK: Okay. Bye.

19 MS. MANIGAULT NEWMAN: Thanks, John. Bye-bye.

20 Good job.

21 COURT REPORTER: Any instructions for the

22 court reporter?

23 MR. PHILLIPS: Does the witness read or waive,

24 Ryan?

25 MR. STONEROCK: See, I mean, we're operating

Page 228

1 under sort of different, you know, rules. I'm not

2 sure exactly what the New York rules are. But I

3 would like to have Sean have an opportunity to

4 review the transcript and correct any- -- anything

5 that, you know, he needs to correct, so . . .

6 MR. PHILLIPS: That's totally appropriate

7 and fine.

8 And I'll let you know if we're ordering a

9 copy, unless the campaign wants to pay for it.

10 MR. STONEROCK: Yeah. I mean, we're going to

11 -- we're going to order a copy.

12 MR. PHILLIPS: Okay.

13 MR. STONEROCK: So I know we went through

14 this -- we went back and forth on this the last

15 time. But I understand that Mrs. Masters would

16 like each party, if they're gonna get a copy, to

17 pay for it. So we're not gonna pay for -- for your

18 client's copy, John. We'll pay for our own.

19 MR. PHILLIPS: Okay. No. That's fine. I'll

20 take a copy. But if you're ordering it, that --

21 that saves me, like, a little bit of money.

22 COURT REPORTER: Okay. So we have to conclude

23 definitely who is ordering the original.

24 MR. STONEROCK: Well, the original, John,

25 should go to you.

Page 229

1 MR. PHILLIPS: Okay. I'll take it.
 2 MR. STONEROCK: I mean, and we should get --
 3 MR. PHILLIPS: I was trying to save some money
 4 for my client, you know.
 5 COURT REPORTER: All right, John, so you're
 6 ordering the original?
 7 MR. PHILLIPS: I am.
 8 COURT REPORTER: And Ryan will take a copy.
 9 Thank you.
 10 (Discussion off the record.)
 11 (The deposition was concluded at 3:30 p.m.)
 12 - - -
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Page 230

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 31, 2021, produced a Arizona Driver's License as
 8 identification, and was duly sworn.
 9 DATED this 16th day of April 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
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Page 231

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 SEAN RAY DOLLMAN; that a review of the
 8 transcript was requested; and that the transcript is a true
 9 and 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 16th day of April 2021.
 16
 17
 18
 19 /s/ Elizabeth M. Masters
 20 ELIZABETH M. MASTERS, RPR
 21
 22
 23
 24
 25

Page 232

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 _____
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 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 _____
 DATE SEAN RAY DOLLMAN
 25

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3 Jacksonville, Florida 32207
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6 April 16, 2021

7 RYAN J. STONEROCK, ESQUIRE

8 Harder LLP

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10 Beverly Hills, California 90212

11 rstonerock@harderllp.com

12 RE: DONALD J. TRUMP FOR PRESIDENT v. OMAROSA MANIGAULT
13 NEWMAN

14 Deposition of: Sean Ray Dollman

15 Dear Mr. Stonerock:

16 This letter is to notify you that the transcript of Mr.
17 Dollman's deposition that was taken on March 31, 2021 is
18 now ready for his review.

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

23 Thank you for your assistance.

24 Sincerely,

25 /s/ Elizabeth M. Masters

Elizabeth M. Masters, RPR

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

<hr/> # <hr/>	15 19:6 80:15,16 81:2 167:14	2016 10:14 68:11 83:1 108:1,11,12 122:13 138:5,6,18 149:3 208:13 213:23	31 216:19	9:20 104:3
#WOKE 74:22	150 60:19	2017 10:3,11 11:7	32 205:6,11,12	9B 58:20,24
<hr/> \$ <hr/>	16 30:1 39:10 81:7,8, 10,20	2018 16:3 159:8	35 94:6,11	<hr/> @ <hr/>
\$1.26 180:1	166 53:24	2019 216:19	35-second 24:1	<hr/> @realdonaldtrump 216:20,25
\$15,000 152:2,5 160:25 161:6,10 177:4 178:20	16B 82:10 88:15	2020 10:3 11:7,8 68:12 69:25 74:6 108:4,10 109:7,12, 16 110:2,17 114:1,2 122:13 124:3 138:4, 6,17 152:12 167:15 168:8 175:25 183:13,19 220:20	3:08 219:7	<hr/> A <hr/>
\$166 17:9 37:12,24 53:24	16C 91:22 92:19	2020's 124:6	3:18 219:7,8	a.m. 58:5
\$186,996.50 212:7, 9	16D 93:12 97:14,17	21 93:22 146:8 150:8,11 159:2,7 185:14	3:30 229:11	AAA 212:13
\$2,800 197:18	16E 97:25 98:15 101:10 102:16	21A 159:2	<hr/> 4 <hr/>	ability 8:10 198:17
\$200 164:2	16F 103:1	21B 158:21,23	4 33:5,18 42:4 193:17 194:14,19 196:6	abortion 41:14,21 42:15 43:3 44:13,21 45:1
\$4 211:23	17 103:20 104:8,19, 25 105:4 112:14 225:11	21C 159:1,3	4:00 173:25 219:4	Abraham 106:17
\$4,078,295.20 211:22	18 112:15 113:21 225:11	22 159:7 162:21 164:20,23	<hr/> 5 <hr/>	Absent 226:23
\$4,7 211:22	19 116:6,24 117:4,25 121:22 133:2	23 166:12 167:3	5 39:4,5 40:14,16 42:4 199:2,18 202:24	absolute 60:21 61:1 124:22
<hr/> 1 <hr/>	19A 118:2 119:9,12	24 17:17,20 20:24 38:17 53:25 55:16 116:7 171:23	50 33:10	absolutely 7:17 86:20 87:5 94:4
1 20:23 25:1,5 153:17 185:15 189:16 192:7	19B 119:25 121:3	249 88:18	500 203:21 215:4	accent 134:3
10 69:4,19,22 77:12 103:25 154:24 155:4,15 157:15,17, 18 158:6,9 219:3	19C 124:11 125:3,6 129:6	25 17:17 184:13,23	5:00 173:25	accept 186:13
10-minute 174:7,9	19D 131:3 133:3	26 17:17 216:15,17, 18,21	<hr/> 6 <hr/>	accepted 162:1
10-second 73:11	19E 133:14 135:23	27 216:15	6 41:5,6,7 42:4 43:16,22 44:20 153:18	accepting 14:15
100 71:14	19F 136:24	293 202:24	60 112:23	access 82:10 102:20 105:13 138:23 216:24
11 71:11,16,20 73:1	1:00 174:5	298 185:1 203:18	65 163:9	account 217:1
11:09 58:5	1:50 174:6,17	2:00 174:2,15,17,19	<hr/> 7 <hr/>	accurate 15:4
11:16 58:5	<hr/> 2 <hr/>	2:06 179:5	7 43:16,17 45:7,21	accusing 200:21
12 73:2,8	2 24:1,18,25 25:2,5,8 26:8,13 154:19 155:12 157:12 187:10 192:13 193:4 205:11	2:08 179:5	70s 50:7	achieve 35:19
12:09 104:6	20 114:2 124:9 139:14 144:1 219:2	<hr/> 3 <hr/>	<hr/> 8 <hr/>	achieving 60:15
12:20 104:3	200 37:12	3 29:23 30:16 31:1 32:25 33:1,2 42:5 193:9	8 51:24 52:11,15 53:9	acknowledges 178:22
12:24 104:6,7	2002 33:8 98:17	30 94:3 219:2	8022 113:19	Act 23:3 24:11 26:20 27:22 33:13 34:19, 21 39:19 40:17 42:15 52:23 67:18 68:9 142:4
13 57:19 73:18,22 74:1	2005 98:17		<hr/> 9 <hr/>	action 59:21 211:12
14 57:19 74:8,19 76:11 77:7 136:14	2006 92:8		9 55:24 56:16 58:8 62:20 64:12 104:3	actual 46:7 64:15 192:7
	2010 98:17			ad 24:1,17,24 25:8 26:8,13 27:9,14
	2012 14:24			

- 30:15,16 31:1 33:5,
21 34:2,14 39:3
40:14 41:5 43:21
44:20 45:7,21 51:24
52:14 53:8 58:7
69:22 71:11,20,21
73:11 74:1 75:13
77:7 81:7,24,25 82:1
104:25 113:25 114:8
117:4,19 119:15
121:21 122:5,12,13,
16 135:7 164:23
165:20 169:9 172:1,
4,10,11,12,13,16,25
180:25
- add** 173:14
- added** 107:16 158:7,
10
- adding** 199:25
- addition** 118:14
163:19
- additionally** 110:11
- address** 44:11
193:16
- addressed** 40:16
44:21 163:21
- administration**
112:24 123:22 142:1
163:22 164:14
- admissible** 17:4
- admission** 191:9
- admit** 83:10 118:4
- admitted** 118:22
- ads** 12:9 17:19,20
20:23 35:19,20
38:17 44:4,7 53:25
55:16 72:17,18
74:23 76:11 77:14,
20,22,24 78:23
107:16 126:25
134:16 135:1 138:16
139:8 181:19 195:6,
8 197:2 198:1,15,18,
23 200:14 204:9,11,
13,16,17 225:7,12
- adult** 200:20
- advancement**
164:12
- advertisements**
42:8 198:8
- advertising** 45:3
- advice** 14:15
- adviser** 221:20
222:2,9,15
- advisors** 164:15
- advisory** 152:10
- advocate** 162:24
- affect** 222:15 223:5
- affected** 41:17
67:15,20 68:6 142:6
- affecting** 67:1
- affiliated** 215:4
- affiliates** 72:9
- afraid** 99:14 184:16
- African** 23:9 26:5
27:15,18,19 50:3,18
51:16 53:12 59:18,
20 60:16 66:22,23
67:5,7,11,20 71:21
72:9,10,15 76:13
77:13 78:22 79:20,
25 124:18 138:24
168:22
- African-american**
27:3,4 31:14 34:17,
23 37:15,16 42:5
47:25 51:1,10 59:17
60:19 67:25 68:4,12
71:2
- afternoon** 169:11
227:16
- age** 94:3
- agents** 72:8
- aggregate** 54:8
- agree** 6:4,6 18:18
43:6 62:17 63:3
79:18 101:17 105:11
107:15 122:20,21
125:11 131:10
154:22 155:13
157:13 158:8 182:12
- agreement** 6:2
152:16,24 153:5
154:7,23 155:14
157:14 159:1,6,14,
15 160:12,23 187:13
203:3 214:17 215:11
219:19
- agreements** 161:19
214:3 217:9,12
- Ah-ha** 21:22
- ahead** 27:17 65:16
85:20 179:10
- air** 173:14
- aired** 43:21 44:5
69:22 73:12 81:24
82:1 117:16 164:24
172:6
- Alexandria** 142:14
- algebra** 93:24
- Ali** 70:25
- Alice** 23:6 52:1,3,20
- aligned** 12:3
- all-time** 94:23
- allegation** 53:10
- allegations** 212:18
- alleged** 112:6
- allegedly** 205:13
210:24
- Allen** 63:12 101:5
- allocated** 201:17
- allowed** 20:4,12
91:8 96:24 197:1
227:2
- allowing** 7:10
- alongside** 92:9
- Alva** 211:11
- amazing** 60:20
61:16,20
- ambiguous** 11:17
13:24 19:25 24:21
25:10 40:20 54:19
55:19 66:12 75:5
79:4 82:15 90:5 93:2
101:24 102:9 105:5
108:18 119:18
121:15 122:8 124:4
125:14 135:17
145:11 165:4 167:9
181:3 192:25 206:1
210:25
- Amendment**
177:13 206:24 207:6
227:2,11
- America** 20:5 24:7
45:11,18 47:5 48:1
60:21 74:17 104:17
113:17 120:22
123:4,5 141:5
143:10,15,23 145:9,
10,12 149:25 150:2
166:19,22 168:8
- America's** 116:19
- American** 15:18,20,
24 16:2,4,7,10,15
17:8 23:19 24:19
25:9,13 26:7,11
31:3,7 33:22 34:4
36:16 37:24,25 38:8,
13 44:3 50:19 53:11,
22 54:7,11,16,17,21
55:2,17 59:20 71:14
78:22 107:5 118:18,
25 122:24 134:14
141:9 143:1,17,19
146:12,19 149:22
174:24 176:22 177:2
212:8
- Americans** 23:10
24:11 26:5 27:15,18,
20 32:15 50:4 53:12
59:19 60:16 66:22,
23 67:5,7,11,20
71:21 72:9,10,15
76:13 77:13 79:20
80:1 134:13,24
135:6 142:6 163:3
166:17,18 168:22
- AMMC** 175:13
177:15 178:19
179:17,22,25 180:6,
25 181:21
- AMMC's** 181:12
- amount** 11:7 44:10
128:3 161:16 162:15
195:4 197:9 200:3
201:13,17,19,21
- amounts** 54:13
- ANCHOR** 129:8
130:2,15,20
- and/or** 212:25
- angry** 61:8
- annual** 55:2 164:2
- answering** 16:16
201:25
- answers** 7:25 8:1
189:2
- Anti-defamation**
129:9 130:3
- anti-muslim** 124:3
- antidefamation**
64:2,5
- any-** 228:4
- AOC** 142:14
- apologize** 30:23
55:23 69:5 79:7
190:4 193:25
- apology** 124:15
- apoplectic** 199:6
- apopolec-** 199:6
- appearance** 136:22
- appearances** 75:24
159:9,10 192:23
- appeared** 136:6
180:24
- appears** 125:6,7
- applause** 61:6 62:6
101:6 118:13,19,23
119:2 120:6
- apply** 141:21
- appreciation**
193:15
- Apprentice** 199:4
- apprenticeship**
87:17
- approve** 52:9 56:14
65:6 167:1
- approved** 11:9
179:25
- approximate**
214:24
- approximately**
17:9
- April** 16:3
- Arab** 170:13
- Arabs** 170:13
- arbitration** 207:25
210:4 211:11 212:8,
10
- archival** 72:24

areas 68:6	assuming 158:5 226:23	71:24 72:14,16 102:6 106:24 107:3, 7 111:12,16,21,24 112:2,5 121:20 154:8,11 202:7 203:24 204:1 207:8, 14 212:18 221:7,22, 24 222:12,25 223:25	Beach 83:9	Billy 83:6,11,14 84:1,5,7,9,11,14,16, 25 85:10,13,16,18, 24 86:5,8,16,22,25 87:2,10,14,16,19,21
argument 177:1	assumption 77:21		bear 17:17 34:22 205:6	bit 96:8 124:9 127:15 140:1,2 170:3 201:20 228:21
argumentative 53:16 78:7 79:4 106:1 115:4,24 131:23 132:20 134:4 135:16 166:8 172:19 173:2,16 205:2,25 213:7 216:11	atom 110:4,9	attach 25:1 32:25 39:4 58:19 158:20, 25	beat 149:24	bitch 83:22 88:21 105:23 106:10,19 107:18
Arianna 86:2,4,7, 10,13,15,18,24 87:5, 7,10,12,15,18,22,25 88:3,6,8,11	attack 169:3	attacks 169:5	beautiful 83:7 85:6 93:14,17 95:3,17 133:8 193:15	bit 96:8 124:9 127:15 140:1,2 170:3 201:20 228:21
Ariane 86:9	attacks 169:5	attempt 160:1,3	beauty 94:14 190:22	bitter 39:14
arising 163:7	attending 24:9	attending 24:9	bee 140:7,15	black 45:10,14,15, 17 46:11 47:1,2,4,11 48:14 49:4 50:9 59:3,23 60:13 65:10 74:11,15 75:22 78:3, 4 80:19,22 166:17, 20
Arizona 6:18 14:23	attention 87:17	attitudes 118:16	beg 87:16	black 45:10,14,15, 17 46:11 47:1,2,4,11 48:14 49:4 50:9 59:3,23 60:13 65:10 74:11,15 75:22 78:3, 4 80:19,22 166:17, 20
arms 136:20	attorney 8:4 155:18 156:18 157:21 158:12 159:18 185:7 189:19 190:12 193:1 194:24 208:3 210:16 211:3,14,23 212:2, 22 214:7 215:23 217:14 219:21	attorney-client 155:19 156:19 157:22 158:13 159:19 185:8 193:19 208:4 211:15 212:3, 23 214:8 215:24 217:15 219:22	back 7:5 20:19 33:8 40:13 51:23 53:5 56:8,11 58:7 62:12 64:25 65:3 88:20 90:18 98:8,15 104:2, 7 113:24 114:11 121:21 132:11 144:17 148:19 150:1 151:8,13,21 156:13 157:3,8 160:3,8 174:18 178:12 179:7 182:2,6 184:17 187:23 196:4 219:8 225:21 228:14	begin 59:17 139:19 141:11 147:9,25
army 45:11 56:2 64:19 74:12 104:13	attorneys' 211:24	backbone 142:3	beginning 10:3 11:8	behalf 6:5 61:25
arrested 30:1 33:8 224:19	attracted 85:6	background 14:18 51:7 142:8 204:8	BEHAR 100:4,6,8, 21 101:5	BEHAR 100:4,6,8, 21 101:5
article 167:14 179:24 180:10,19	attributable 212:9, 10	backstage 96:20	behavior 40:2 107:6	behavior 40:2 107:6
articles 177:5 182:16	attribute 194:19 224:15,17	bad 148:19	belabor 203:16	belabor 203:16
ARTIE 94:6 96:9	attributed 89:17 106:18 195:4 211:24 221:6,21 222:24 223:1 225:8	Balcom 39:8,10,14 40:17 43:2	belief 46:8 145:19 194:9 198:3	belief 46:8 145:19 194:9 198:3
Asian 134:13,24	audio 102:25 178:10	bank 30:2	believed 42:14	believed 42:14
asleep 171:10	August 216:19	banned 123:21	believes 70:18 166:21	believes 70:18 166:21
ass 93:19 97:18	auto 186:12	Barack 50:8 106:23	belly 170:4	belly 170:4
assault 107:6 142:21 200:22	automatically 85:5	base 38:16	benefit 35:15 113:1, 11	benefit 35:15 113:1, 11
Assembly 163:5	avoid 8:23 154:22 155:1,13 157:12 158:7,8	based 28:17 43:20, 25 50:24 54:23 77:23 80:8 91:3 103:14 123:11 139:9 155:21 157:24 158:15 159:20 204:9 217:17 225:21	benefits 35:10	benefits 35:10
assert 227:6	avoided 177:8	Basic 153:2	Berman 136:1,16	Berman 136:1,16
assessed 176:9	aware 26:18 44:12	basically 179:1	Beth 7:14 22:2 216:15	Beth 7:14 22:2 216:15
assets 26:17		basing 91:6	Biden 69:25 132:12 142:23 145:18 167:16 168:16 169:2,3 170:6,22	Biden 69:25 132:12 142:23 145:18 167:16 168:16 169:2,3 170:6,22
assistance 116:14 121:25		basis 67:2 171:6	Biden's 143:10 145:9,10,12 166:19 168:20	Biden's 143:10 145:9,10,12 166:19 168:20
associate 77:23 78:4		basketball 49:14	big 37:9 41:15 83:24 141:15 166:14	big 37:9 41:15 83:24 141:15 166:14
Association 212:8			bigotry 118:21	bigotry 118:21
assume 10:6,7 19:11 22:14 43:25 75:11 79:24 99:6 100:8,10 116:1 120:16 154:12 219:14			bill 64:15	bill 64:15
			billion 180:1	billion 180:1

breaking 57:17		175:14 182:21 183:7	169:4,5 173:13	categories 205:10
breaths 39:11	C	184:4 185:6,7,22	174:25 176:1,7,11	category 205:11
Brewer 166:14 167:15 168:4	C-O-H-N 221:21	186:5,22 187:14	180:25 182:14	caught 29:25
bring 157:8	cabinet-level 224:19	189:17,18,19	187:7,12 188:4	caused 125:21 192:7 202:4,8 210:13,22,23 224:21 225:23
bringing 61:12 120:13,14,15 151:20 152:12 157:3	calculated 13:24 17:3	190:11,12,13	189:15,16 190:8,24	ceiling 141:5
broadcasting 168:3	calculates 202:12, 13	191:11,12 192:8,9	191:1,8 192:6 193:4, 10,17 194:4,19,20	celebrate 59:16 136:5
broke 113:4	calculator 196:6,15 202:4,20	193:2,18,19 194:22, 23 196:9,10 197:4, 11 198:11 199:10,11	196:2,25 197:10,17	cell 30:3
brought 108:1 139:25 141:15	calls 51:9,16 118:9 132:13 147:8 162:7, 8,10,11,18 167:16	200:5,6 201:7,8	198:8,22 199:9,18	center 142:25
Bryant 45:9,10 46:10	called 92:24 94:12 129:9	202:10,11 204:2,3	200:2,4,10 202:5,6	CFO 10:4 13:21 192:5 194:12 196:3 202:6
build 75:21,22 82:3 152:12	calling 32:20 97:18 138:24 178:23	205:1,23,25 206:17, 25 207:10,18 208:2, 3,4 209:5,6,18,19,20	204:1 206:23 208:1, 12,15 209:12,16,17	challenge 141:15
building 45:10 80:19 104:12 144:18 152:10	call 51:9,16 118:9 132:13 147:8 162:7, 8,10,11,18 167:16	210:6,7,15,16 211:1, 2,13,14,15 212:1,2, 22,23,24 213:8	210:14,22,23 211:21	challenges 69:12
built 138:9	calls 11:17 12:14 18:21 19:3,24 20:8	214:6,7,8,18 215:5, 12,13,22,23,24	212:7,25 213:12,21	champion 45:13 46:11,25 47:11 48:7, 14 49:4,6 50:3,9,11 142:7
bunch 30:6 213:24	calling 32:20 97:18 138:24 178:23	217:2,13,14,15	214:2 215:19,20	champions 48:8
burning 145:8	calls 11:17 12:14 18:21 19:3,24 20:8	219:20,21 220:5,12, 24 221:14,15	216:2 219:18 220:22	chance 56:6 64:23 169:18 198:13 222:4,16
bursting 52:5,21	calling 32:20 97:18 138:24 178:23	222:17,18,19 223:7, 8,9 224:8,9,10,23,24	223:16 224:3,4,18, 22 225:23 228:9	chances 221:13 223:6
bus 85:22 86:17,23	calls 11:17 12:14 18:21 19:3,24 20:8	225:24,25 226:13,14	22 225:23 228:9	change 94:9
Bush 83:6,11,14 84:1,5,7,9,11,14,16, 25 85:10,13,16,18, 24 86:6,8,16,20,22, 25 87:2,10,14,16,19, 21	calling 32:20 97:18 138:24 178:23	campaign 6:6,22,24 8:17,20 9:14,17	campaign's 180:1 198:15 199:3 225:18	changed 83:25
Bushy 86:22,24	calling 32:20 97:18 138:24 178:23	8:17,20 9:14,17	campaigns 98:19	changing 143:8
business 12:24 15:17 69:15 139:24 140:17 141:11 142:2,8 146:16,17 147:1,20	calling 32:20 97:18 138:24 178:23	10:19,22,25 11:5,12, 13,15,25,12:12,18, 20 13:11,17,22	Campins 104:11,12	characterization 134:10
businesses 142:9 200:2,3,12	calling 32:20 97:18 138:24 178:23	15:13,16,22 16:20, 22 17:19,20 18:1,5	candidacy 13:5	characterize 134:11
busy 169:24	calling 32:20 97:18 138:24 178:23	20:23 21:4 24:17,24	candidate 105:22 106:8 107:5 137:3,6 138:1,10 168:18 169:2,9 197:2	characterized 134:13 225:19
buy 17:12 37:20	calling 32:20 97:18 138:24 178:23	25:8 26:3,4,8,13,16	candidates 12:3	characterizing 67:7 108:25
buying 12:9	calling 32:20 97:18 138:24 178:23	27:9 30:16,25 33:5	candidly 225:17	charge 33:10 170:5
Bye 149:21 227:18	calling 32:20 97:18 138:24 178:23	36:9 37:12,19 38:11, 17 39:1,3 40:14,16	capable 113:9 114:21 115:2	chart 188:18 189:8 203:5
Bye-bye 227:19	calling 32:20 97:18 138:24 178:23	41:5 43:22 44:2,4,20	capacity 207:20,21	cheat 174:21
	calling 32:20 97:18 138:24 178:23	45:7,21 51:24 52:14	capitalism 142:22	cheated 204:24 205:19 206:15
	calling 32:20 97:18 138:24 178:23	53:8 54:13 58:7	car 56:3 64:20	checkout 94:12
	calling 32:20 97:18 138:24 178:23	63:21 64:3,5 68:11, 12 69:22 71:11,20	care 148:21 149:20 171:2,15 203:6	
	calling 32:20 97:18 138:24 178:23	72:8,11,22 73:25	cared 24:11	
	calling 32:20 97:18 138:24 178:23	74:23 75:19 77:7,22	careers 113:14	
	calling 32:20 97:18 138:24 178:23	79:1,21 81:7 90:13, 15 102:14 105:18, 21,22 106:8 107:16,	Carolina 136:3	
	calling 32:20 97:18 138:24 178:23	115:15 117:3,4	carrying 126:12	
	calling 32:20 97:18 138:24 178:23	119:15 121:6,7	case 14:1 85:4 89:22 137:9 177:10 208:17 211:25 213:7	
	calling 32:20 97:18 138:24 178:23	126:9,18 127:2,14, 17,24 133:20 136:2	cases 17:15	
	calling 32:20 97:18 138:24 178:23	137:10 139:13	casting 123:11	
	calling 32:20 97:18 138:24 178:23	150:15,20 151:1,9, 21 152:5,11 154:9, 13 156:13 157:4,9, 25 160:4,6,9 161:1, 6,11,13,16 162:2,16 164:23 168:22	Catalina 139:16,21 140:2,4,11,13,20 141:5,25 143:7,16	

chest 180:1	125:6 133:3 134:10, 23 135:16,21	225:2,3	complex 29:6	12
Chicago 139:22,24		commercial 22:18 23:18 24:24 40:14 42:17 62:19 64:2,12, 16 65:9 70:15 117:15,16,20 121:22 124:10 144:14 145:5 167:15 181:11	compliance 12:19	conflict 95:24 96:2, 3,8
chief 6:25 8:21 9:6, 9,11 106:8 222:23 223:4	clips 98:16,25 226:9		compliant 198:9	confusing 58:22
child 163:18	close 14:9 98:18 116:6		component 198:19, 24	congratulate 60:21 61:14,21
children 146:18	closing 15:15		compound 24:20 30:19 40:19 42:8 53:15 71:4 106:11 107:20 119:18 122:8 139:5 201:7 224:23	Congress 57:9 146:2
children's 139:19	clothes 97:10	commercials 52:25 65:25 66:4 67:4 68:20 69:1 72:1,2 165:13 168:21 218:11	computer 164:1,3	Congresswoman 144:5
China 133:6	CNN 97:17 98:5,9, 16,18 102:20 103:2 127:11 129:8 130:2, 15,20	Commission 174:23 197:3 198:9	conclude 228:22	consent 91:13
Chinese 135:5,6	coalition 75:19,22 76:19 77:11 78:1 80:20 82:4 105:9,12, 19 108:2,8,13 114:16 144:19	commitment 164:11	concluded 229:11	conservative 142:11
choke 142:25	coalitions 75:18 76:20 152:11	common 120:18,19	conclusion 19:24 20:8 39:21 45:25 46:14 47:15 50:22 88:25 89:11 90:5 91:15 103:10 115:24 125:23 126:19 155:3,11,18 156:18 157:21 158:11 159:18 186:6,23,24 187:15 189:6,18 190:12 191:12 192:9 193:1,19 194:23 196:10 197:5,12 198:12 199:11 200:5 201:8 202:11 204:3 206:1 207:1,11 208:3 209:6,19 210:7,15 211:2,14 214:9,18 215:12,23 219:21 220:5,13,24 222:17 223:9 224:10,24 225:24 226:13	conspiracy 33:9
choose 67:18 145:10	cocaine 33:11	communication 159:19 185:8 211:15	conclude 228:22	constantly 141:13
chose 70:13,14	Cohn 221:20	communications 155:19 156:19 157:22 158:13,16 208:5 212:3,24 214:8 215:25 217:16 219:22	conclusion 19:24 20:8 39:21 45:25 46:14 47:15 50:22 88:25 89:11 90:5 91:15 103:10 115:24 125:23 126:19 155:3,11,18 156:18 157:21 158:11 159:18 186:6,23,24 187:15 189:6,18 190:12 191:12 192:9 193:1,19 194:23 196:10 197:5,12 198:12 199:11 200:5 201:8 202:11 204:3 206:1 207:1,11 208:3 209:6,19 210:7,15 211:2,14 214:9,18 215:12,23 219:21 220:5,13,24 222:17 223:9 224:10,24 225:24 226:13	constitution 118:20
chronic 136:19	cold 118:6	communities 34:18 47:25 56:7,12 57:10 64:24 65:4 67:15 69:13	concluded 229:11	construction 147:24
Church 60:1	collapse 136:5	community 37:15 47:25 48:4 51:1 60:19 67:1,11,25 68:4,7	conclusion 19:24 20:8 39:21 45:25 46:14 47:15 50:22 88:25 89:11 90:5 91:15 103:10 115:24 125:23 126:19 155:3,11,18 156:18 157:21 158:11 159:18 186:6,23,24 187:15 189:6,18 190:12 191:12 192:9 193:1,19 194:23 196:10 197:5,12 198:12 199:11 200:5 201:8 202:11 204:3 206:1 207:1,11 208:3 209:6,19 210:7,15 211:2,14 214:9,18 215:12,23 219:21 220:5,13,24 222:17 223:9 224:10,24 225:24 226:13	construed 95:23 96:10
churches 60:4	collectively 199:21, 23,25 200:8 204:7	community's 37:16	conclude 228:22	consult 161:6
circle 37:9	College 60:14	companies 73:6 215:4	concluded 229:11	consultant 161:13
circumstances 213:17	colleges 59:3,19,23 60:3 65:10	Companion 152:16 154:7 159:15	conclusion 19:24 20:8 39:21 45:25 46:14 47:15 50:22 88:25 89:11 90:5 91:15 103:10 115:24 125:23 126:19 155:3,11,18 156:18 157:21 158:11 159:18 186:6,23,24 187:15 189:6,18 190:12 191:12 192:9 193:1,19 194:23 196:10 197:5,12 198:12 199:11 200:5 201:8 202:11 204:3 206:1 207:1,11 208:3 209:6,19 210:7,15 211:2,14 214:9,18 215:12,23 219:21 220:5,13,24 222:17 223:9 224:10,24 225:24 226:13	consultants 38:8 54:22 161:1,5 174:24
cite 38:24 39:2	color 28:18 29:19	community 37:15 47:25 48:4 51:1 60:19 67:1,11,25 68:4,7	Concordia 163:5	Consulting 54:7 159:1,6,13,14 160:23
city 24:6 163:5	comedy 92:22 93:8	company 15:12 37:11 54:22 139:20 187:20	condemn 129:10,14 130:6,10	consumption 194:17 195:16,18
civil 23:14 50:19	command 163:2	compensated 54:17,23 71:22 72:10,17,24 74:3	condition 136:19	consultant 161:13
claim 136:4 188:1, 11 198:24	comment 28:9,12 30:18 31:13 46:17 52:19 89:7 133:18 168:1 196:8,21 199:9,12 203:24 205:6 221:3,7,22,25 222:25	compensation 151:15,20,24	conduct 37:25 121:9	consultants 38:8 54:22 161:1,5 174:24
claimed 175:17 205:9	comments 27:1,2, 10 28:10 41:3 70:24 71:1 88:19 101:13, 14 103:17 110:24 126:11,16 131:6 133:19 144:9 145:3 168:20 185:1 187:19 189:16 190:19 197:22 199:13 204:10 208:14 209:11,16,17 222:12,14 223:4	complaint 174:22 175:5,10,18,22 177:12,22	conduct 37:25 121:9	consultant 161:13
claiming 225:4			conduit 177:8	consultants 38:8 54:22 161:1,5 174:24
claims 137:9 184:2			confidence 120:25 224:5,8	Consulting 54:7 159:1,6,13,14 160:23
clarify 78:13			confident 75:9	consumption 194:17 195:16,18
class 24:9			confidential 186:4, 19 210:7 212:24	contend 189:9
classes 184:19			confidentiality 188:2,5 203:2 217:9,	contends 188:4
clause 154:19,20 187:12				contention 27:8 225:18
Click 81:17 104:16				contest 190:22
client 16:7,15 229:4				context 46:21 93:6 112:11 123:19 162:6
client's 228:18				contingency 54:10
clients 16:5,11				contingent 54:11
Cliff 210:2,4,14,22 211:6,7				continue 13:4 75:22 81:15 88:4 141:22 198:3
clip 64:15 97:17 98:4,6 99:8 103:2				continued 168:7

contract 126:9 154:25 155:1 156:3 213:13	13 228:4,5	27:25 93:21 148:16 153:17 173:23 185:18 188:8	cyberland 6:16	daughter-in-law 150:23
contractors 212:25	correcting 23:22 35:25 36:2 108:16	court 6:1 22:4 127:22 191:23,25 207:9 216:17 227:21,22 228:22 229:5,8	<hr/> D <hr/>	daughters 101:20
contracts 10:18 11:8 177:3	corrective 197:2 198:1,2	cover 99:15 220:10	D'SOUZA 112:20 114:5,12	David 129:11,14,18, 23 130:21,24
contradicted 31:10 32:7 52:20	correlated 122:2,19	coverage 110:11 123:4 131:8 137:3,6 138:1,5	dad 140:7	DAWN 146:24 147:2,12,24 148:9, 14,25 149:11
contradictory 135:11	correlation 121:10	covered 167:6 214:16 215:10	dad's 139:24	day 52:4 63:18 64:1 137:15 143:21 154:5 169:12 170:11 178:25 207:16
contradicts 27:15, 20	correspondence 159:21 211:17 217:19	COVID 141:15	daily 37:9 171:6 194:16	days 6:17 24:8 138:9 148:24
contribute 131:10 165:21	Corrine 74:10,25	crack 33:10	damage 105:12 190:7,23 193:4,9,17 194:13 199:9,24 209:3 220:22 221:12 222:3	deal 59:15 133:11 163:16 203:6
contributed 132:17	costar 87:2	crazy 140:1 182:8	damaged 126:17 189:16 196:7 199:18 208:14	dealing 65:24
control 105:12 153:8 186:14	counsel 6:1 14:15 17:18 30:16 154:2,3 155:22 157:24 158:16 159:21 185:10,11 187:4,5 211:17 214:2,11,12 215:19 216:2,3 217:19	create 59:18 60:10 77:20 94:15 140:1 146:1	damages 126:10 137:9 176:8,20 190:25 191:8 192:7, 15,19 194:3 195:3,7, 24,25 196:22 198:19,24 200:4 201:3 202:4 204:1 208:23 209:14 210:13,22,23 224:17,22 225:23	debunked 136:4
convention 25:20, 22 26:1,17 34:15	counter 114:19 117:5	creates 195:3	damiing 194:20 209:16,17	December 14:23 175:25
conversation 7:20, 21,23 8:11 151:4,18, 19 157:1 178:19 180:2	counteract 30:17 66:2 79:2 119:14 122:12 128:4 135:2 138:17 165:13	creating 138:16	dandy 184:19	decided 142:18
conversations 156:10,16 157:2 158:15 168:4 214:1 215:18 219:16,17	countermessaging 38:3 133:20 165:2,5	creation 179:25	dangerous 119:5	deciding 123:24
convicted 33:9	counternarrative 27:9	credibility 127:11, 13,16,21 180:13 194:9 200:16	Danielle 112:20 114:4,12	decision 38:16 74:22
conviction 30:1	countervoice 142:19	credit 163:18	Daniels 194:15,21 195:10,25 204:25 205:19	declined 199:5
coordinated 173:22	countries 51:10,17 116:13 117:21 121:24 123:20,24 124:18 125:9 138:25	crime 40:9 120:15 143:11	Daniels' 195:22	decrease 68:11
copy 228:9,11,16, 18,20 229:8	country 19:21 20:13 41:12 45:14 47:1,12 48:15 61:25 71:3 80:20 91:8 94:21 96:13 118:5,10,17, 22,25 123:10 140:5, 24 143:20,22 150:5 163:1 164:16	crimes 40:3,7	darling 86:19	dedicated 104:14
coronavirus 147:21	criticism 136:2	criminal 67:6	darned 227:10	deemed 147:1
corporation 177:2	culture 135:12	criminals 67:8	dated 167:14 216:19	defamatory 30:18
correct 10:9,10 17:24 18:3,7 28:14 35:20 36:4,11,13,22 41:4 46:20 47:8 53:13 54:3,24 55:15 56:25 66:3 73:17 77:11,14 78:23 80:1 108:13 110:12,19,20 117:22 122:13,15 127:5 128:10 138:6 145:5 152:2 153:24 160:14 166:2 168:14,16 181:1 195:8 204:15 225:9,	curious 30:25 69:16	creating 138:16	dates 98:2,6	defeat 176:12
	current 6:23 13:10 15:23 70:17 175:9	creation 179:25	dating 100:19 101:21	Defendant's 69:4 81:8,10 116:6 158:21 216:18
	cut 88:18	credibility 127:11, 13,16,21 180:13 194:9 200:16	daughter 91:25 92:9 93:14,16 100:19 101:20 102:8 117:21,23 147:4,6 148:16 149:18	defender 60:6
	Cuts 142:4	criticism 136:2		defending 136:4 168:6
	cutting 7:10	culture 135:12		defense 116:17 122:1 175:17
		cultures 139:25		define 122:23 141:6
		curious 30:25 69:16		definition 28:4,5, 11,15 29:7,12 90:25 123:13
	countryside 140:8	current 6:23 13:10 15:23 70:17 175:9		definitional 123:8
	County 146:13			definitively 218:24
	couple 25:19,20			degrees 14:20

delineate 25:4	develop 118:7	disclosures 177:9	DNC 11:25	15,18 102:7 103:7, 12 107:12,17 108:16,24 109:13,18 110:1,5,10,25 111:13,22 112:3,6 117:22 118:4 119:14 120:3,7 121:12 122:22 125:8,12 126:13,17 127:21 128:8,9,20,21,23 129:17 130:8,16,23 131:7 132:13,17 133:5 134:11,17 136:1,9 139:2 146:1 148:21 150:4 152:15 153:21 157:10 165:12 166:4,25 168:23 171:18 172:1,17,24 176:12, 14 178:24 182:20 184:2 190:1,20,24 191:8 195:11,23 199:2 200:1,20,21 204:24 205:17,18 206:15 207:17 209:3 212:17,20 215:9 216:8 217:11 218:3, 15,21 220:21 221:6, 21 222:10,25 223:18 225:19 226:11
delivered 143:18	developed 59:8	discontinued 12:1	doctor 97:6	
delivering 164:17	developing 141:23	discourse 168:8	document 56:21,24 57:2 155:24 157:19 160:9 184:14,21 214:19	
Democrat 12:1	development 116:14	discoverable 13:25	dollar 44:10 195:4 201:3,13,16,18,21	
Democrats 113:5	developmental 121:25	discovery 17:4	dollars 198:7 200:3	
demonstrating 164:11	Devos 163:25	discuss 42:13 91:24 178:11 187:6 204:9	Dollman 6:7,15,16 11:21 14:19 18:20 22:18 104:22 153:20 174:21 178:22 179:14 182:12 189:15 193:23 202:16 203:15 219:10 227:12	
Dennard 80:18 81:5	Dewit 11:2	discussed 13:16 29:8 145:4 155:21 156:20,22,25 159:16 184:3 191:15 216:1 225:17 226:9	Dollman's 17:19	
Denson 208:9,11 209:3	Dexter 217:25 218:2	discussing 26:20	Don 90:16 92:9	
denying 112:21	dialogue 73:20	discussion 194:13 204:11 229:10	Donald 6:22 9:12 10:17 12:11 13:3,5, 21 14:9 16:6,11,14, 17 17:9 18:12,19 19:15 22:22 23:7,13 24:10 28:1 32:20 36:10,24 37:4,12,14, 16 38:2,14,15 41:3, 20 42:15,18 43:3,7 44:12 45:12,16 46:10 47:3,10,11,24 48:6,15 49:4,12,19, 22 50:6,9,18 51:16 52:6,8,16 53:10,12 55:3 56:13,19 57:9 58:9 59:2,8,13 60:3, 5,24 61:7,18,20,23, 25 62:3 63:17 64:1 65:5 66:1 67:19 68:11 69:11,24 70:18 71:2,13,24 72:18 73:4 74:5 76:3 77:15 80:10 81:14 83:8,12,15,17 84:3, 6,7,8,15,21,24 85:2, 11,15,17,21 86:1,3, 5,12,14,17,20 87:1, 4,6,9,20,23 88:1,5,7, 10,13 89:17 90:2,16 91:24 92:1,3 93:14, 17,20 94:1,11,17,22 95:3,7,9,12,15,18 96:3,7,14,19,22 97:4,8 98:20,25 99:11,12,22 100:2,5, 7,10,16,24 101:2,7, 15,18 102:7 103:7, 12 107:12,17 108:16,24 109:13,18 110:1,5,10,25 111:13,22 112:3,6 117:22 118:4 119:14 120:3,7 121:12 122:22 125:8,12 126:13,17 127:21 128:8,9,20,21,23 129:17 130:8,16,23 131:7 132:13,17 133:5 134:11,17 136:1,9 139:2 146:1 148:21 150:4 152:15 153:21 157:10 165:12 166:4,25 168:23 171:18 172:1,17,24 176:12, 14 178:24 182:20 184:2 190:1,20,24 191:8 195:11,23 199:2 200:1,20,21 204:24 205:17,18 206:15 207:17 209:3 212:17,20 215:9 216:8 217:11 218:3, 15,21 220:21 221:6, 21 222:10,25 223:18 225:19 226:11	
depend 99:23	difference 45:23 225:3	discussions 156:1 185:10 195:22 214:11 217:18 219:23	donation 128:8	
dependent 143:5	differentiate 125:20 209:15 210:21 211:1 224:21 225:22	dislikes 28:17,20	donors 12:21	
depending 107:24	difficult 195:5 201:21 204:6 212:13	disparage 188:3	dope 222:11	
depends 47:22 100:2	difficulty 7:14	disparaged 31:10	double 176:17	
depose 189:14 196:13	dig 204:18	disparagement 154:19,20 187:12 188:5 203:3	doubling 163:18	
deposition 7:1,2 8:14 17:20,21 25:2 106:5 137:20 202:18 229:11	digital 25:25 26:2,3, 17 34:14 43:25 73:14 81:25 117:17 172:7,8 181:18	disparaging 26:19 30:17 123:9 187:19	doubt 154:22 155:1, 13 156:3 157:13 158:7,8	
deposition's 201:22	digitally 164:25	disproportion 67:16	dove 201:20	
deputy 9:18,19,20 10:8,12,16,25 121:7	direct 6:11 76:20 77:22 154:18	disproportionately 67:1,7,10 68:7 163:17	draft 146:1	
deregulation 142:5	directed 108:3	dispute 98:20 99:1 180:3	drafted 154:1	
descent 142:12	directly 177:9 197:17 213:18	distributed 23:19 24:19,21 25:23,24 33:22,24 34:4,6,12 180:25 181:4,10	draw 76:22	
description 126:24	director 9:20,21,24 10:8,9,13,16,20,24, 25 11:4 121:7,8 153:20 192:6 196:4 202:7 206:23 212:17 213:18	disproportionately 67:1,7,10 68:7 163:17	dream 141:9	
designed 27:9 165:13	disability 136:7	disproportionately 67:1,7,10 68:7 163:17	dressed 96:23	
desktop 22:11 184:18,19	disabled 138:24	distribution 26:13, 16 34:8	dress 97:8	
despises 28:16	disappointing 99:23	District 191:25	drink 99:20	
destiny 140:23 141:7	disavow 130:14	disturbing 167:16	drive 75:20 77:10	
destructive 142:16	disclose 186:19	dive 44:9	driven 38:10	
detail 111:15	disclosing 186:3	diversity 159:10 164:6	driver 123:24	
determination 191:23	disclosure 190:13 193:20			
determine 37:14 38:1 121:11 168:19 218:20				
determined 126:15				

Dropbox 17:16,18	effort 13:5	92:18 97:13 101:9	event 58:15 62:17	Expand 184:20
drugs 120:14	efforts 150:21	104:18 113:20 115:2	63:22	expect 118:24
dude 169:19	elected 112:23	116:23 119:8 121:2	events 12:10 72:11	expectation 205:17
Duke 129:11,14,18, 23 130:21,24	election 11:15,19, 24 12:7,18 69:25	125:2 127:23 131:2	every- 156:7	expectations 149:4
duly 6:8	83:2 109:7,12,17	133:13 136:23	everybody's 58:17	expenses 11:9
dumb 46:6 221:22	110:2,17 124:3,6	143:25 150:7 164:19	everyone's 96:22	experience 94:5,10
222:3	129:16 138:4,17	167:2 171:22 173:22	everything's 12:23	138:10
dumped 69:6	139:9 143:12	ended 127:24	evidence 13:25	expert 126:20
dumping 120:4	145:17,20 171:20	endorse 69:24	17:4	189:18 190:14
dumpster 69:5	174:23 175:24	129:22	evident 163:4	191:12 192:9 193:2,
duration 219:18	178:25 182:14,19,25	endorsement	ex-vice 150:13	20 194:23 196:11,12
duties 10:15	183:6,14,20 197:3,	130:4	exact 200:19	199:11 200:6 201:8,
<hr/>	20 198:9 207:16	endorsing 130:5	201:16,18,21 214:21	19 202:11,12 204:3
E	220:20	ends 205:16	EXAMINATION	209:7,19 210:16
<hr/>	ELISABETH 100:12	enduring 60:20	6:11	211:2 220:24 221:16
earlier 180:16	elongated 73:11	enforceable 214:5	examples 90:16	222:19 223:9 224:9,
201:19	else's 120:4	English 147:5	exceeded 149:3	24 225:25 226:4
early 50:7 163:24	email 103:23 213:19	ensure 74:12 80:23	Excellent 86:25	expert's 226:5
171:19 178:6	embarrassing 92:7	entered 106:4	exceptional 162:24	expired 156:15
easier 202:21	94:2	entering 123:10	excited 116:18	explain 7:5 108:7
East 120:23	embrace 69:12	entire 32:20,24	170:21	export 116:19
easy 61:16,18	118:25	46:17 66:15 157:1	excuse 70:14	exporting 119:6
219:11	emphasis 107:16	192:22 202:12	executive 56:20	exposed 205:15
eavesdropping	158:7	entities 25:21	58:10 59:3 60:12,24	express 52:15
148:4	employed 6:21	214:16	65:11 224:4	172:16
economic 116:10,	62:21 154:9	entity 12:2 15:15	executives 224:18	expressed 38:2
16 121:22 135:8	employees 212:25	37:19 182:17	exhibit 25:1,2 33:1,	expressing 132:9
163:8,21 194:13	employment 62:25	entrepreneurship	2,18 39:4,5 41:6,7	expression 157:7
221:20 222:2	214:3	140:17	43:15,17 45:7 52:11,	extent 11:14 154:8
economically	empower 113:19	Epstein 216:9	15 56:16 58:20,24	155:20
116:21	empower- 135:8	equality 60:10	69:19 71:16 73:1,2,	extreme 118:9,10
economy 142:3	empowered 113:16	116:20	8,22 74:19 80:15	121:10,11 122:3
143:1,16,24 166:17	116:21	Eric 39:8,10,14	81:2,20 88:15 92:19	eyes 194:8
edge 36:19	empowering	150:24 184:19	97:14 101:10 104:8,	<hr/>
Edition 102:20	162:25	188:14	19 113:21 116:24	F
education 60:8,10	empowerment	escaping 140:21	119:9 121:3 125:3	<hr/>
61:13 163:23,25	116:10,16 119:16	ESL 147:5	131:3 133:14 136:24	fabric 59:25
164:1,4,9	121:23 135:8 163:19	Esquire 106:4	144:1 150:8 158:23	face 58:17 118:8
educational 14:18	empty 73:5	essential 146:17	159:3,9 164:20	facing 136:1 189:23
effect 68:25 114:20	enacted 67:19	147:1	167:3 171:23	fact 45:23 46:3,6,7,
182:18 183:5,13,19	end 22:3 23:16	essentially 7:1	184:12,23 216:21	12 47:13,18,22,23
224:3	24:15 30:13 32:2	159:11 178:17,21	Exhibits 25:5	48:2 50:25 51:2
effective 159:7	33:17 39:17 41:18	192:1 203:1	exist 13:4 49:19,22,	52:18 53:6 83:18
effects 67:12	45:19 47:6 52:10	established 16:3	24 226:23	88:20 90:2 94:15
	56:15 62:10 65:7	estimate 44:6	existed 178:25	103:7 193:14 203:11
	69:18 71:15 73:7,21		exists 218:23	205:20,21 206:1
	74:18 81:1,19 88:14			

factors 213:24	FEC 12:19,22 174:23 175:18 177:8,22	fix 21:12	145:13 146:4 152:7, 19 161:3,22 165:7 166:8 167:22 168:11,25 173:18 175:15 182:22 183:8 184:5 185:7,23 196:10 205:2,24 206:18 207:19 209:6,21 213:8 215:6 217:3,14 221:15 222:18 223:8 224:11 226:14	Gary 221:20
factual 51:6	fed 169:24	flash 114:6	founder 139:19	gave 56:7 64:24 90:16 200:15
failed 83:10	federal 24:7 39:12 174:23 191:23,24 197:3 198:9 207:9 215:21	flip 159:11,12	Fox 82:2 167:14,18 168:3	gender 90:22,23 91:3,7 164:5
failing 55:8	fee 54:11,12 55:12	flourish 118:24	frame 49:17 50:5 66:16 122:11	general 41:2 163:4 165:11
fair 10:4 15:3 37:22 71:10 116:5 137:5 138:10 142:5 145:14 165:14 174:4 204:17,21 226:10,13	feel 8:3 22:25 38:14 43:6 66:20 87:22 103:16 124:2,4 148:10 163:13	focus 26:2 38:1,4	freaking 169:16,22 170:4	generally 104:22 105:1,6,8 111:16 142:22 198:5 200:25
fairly 99:9 177:11	feeling 39:8 92:5 148:23	focused 78:16 108:8 182:15	free 8:3 19:20,25 39:9 52:1,3,20 166:20	generation 142:18
faithful 205:17	feelings 95:13	folder 184:15	freedom 39:11 116:20 143:11	gentleman 62:12 73:25
fall 85:22 203:2	fees 211:24	follow 37:8	fresh 139:9	Georgia 39:13
false 53:19,21 180:6,11 182:24	feet 30:4	follow-up 109:8	friends 45:9 113:3	Gerald 85:22
familiar 75:2 81:5 82:10 102:13 196:19 199:8 211:6	felony 30:1	footage 70:8,14 72:19,21,24	front 142:24 177:5 186:7 188:25 204:10	Gill 112:20 114:5,12
familiarize 153:16	felt 67:12 114:25 115:15	Ford 85:22	frowned 93:9	Gina 81:12
families 24:12 31:7 163:1 164:18	fields 164:9	foreign 96:12 134:2, 3	fulfill 54:9 140:23	girl's 84:1 100:6
family 52:1 71:13 110:25 111:12,14, 21,24 112:2,6 128:20 148:9,12 154:17 169:24 171:16,17 187:19,20 194:3,8 200:2,10 215:10 226:20	fight 22:24 149:23	foreign-based 121:12,16	fun 140:2	girls 94:25 96:12 164:8
fantastic 59:5 62:4 95:4	fighting 81:15 143:18 171:15,16	forever 24:14 220:7	fund 177:6	give 72:21 78:12 84:14,16,17,19 124:14 126:23 130:18 151:12 179:2 194:8 197:10
farmer's 140:12	figure 90:12 100:18 118:1 165:25 176:20 194:12 202:3 227:1	forgot 216:14	funding 27:21 68:3 141:18,19 164:3,5	giving 169:5
fast 7:22 121:1	filed 200:21	forgotten 150:4,5,6	fundraising 12:2 159:10	glad 39:9
father 128:22	fill 163:14	form 8:5,6,23	funniest 96:20	Glover 62:13 63:10, 12
fathers 101:19	film 200:20	formed 46:8	furniture 83:19,20, 21	goal 75:13 76:2
fault 128:1 179:20 208:22	finance 14:20	forms 163:14	Fury 183:12	God 30:4 84:23
favorable 137:25	financial 6:25 8:21 9:6,9,11	fortunate 147:19	future 13:21 59:18, 21,22	goddamn 169:25 170:5 173:5
fear 122:23 183:18 184:2,6	find 20:18 133:1 136:20 212:12	forward 7:23 25:4	garnering 132:10	godsend 169:17
feature 66:22	finding 53:12	foundation 18:22 19:4 26:22 29:1,15 30:20 31:16 32:10, 22 35:1,13 38:6,20 39:22 41:23 42:21 43:9 44:15 45:3 46:15 48:17 49:7 51:12,19 53:2 57:12 62:23 63:20 64:5 65:20 67:22 68:14, 22 70:2,20 71:5 75:5,16 76:6 77:18 79:5,15 80:12 82:16 89:10,19 91:16 93:2 97:20 101:24 105:16 106:13 107:9,22 109:21 111:4 112:9 115:4,11 117:8 122:9 125:25 128:14 129:1 131:14,24 132:20 133:23 134:20 135:18 138:13 144:12	<hr/> G <hr/>	gold 85:3
featured 42:17 64:1 71:21 77:14 172:5	fine 98:13 100:1 130:17 174:10 228:7,19	foundation 18:22 19:4 26:22 29:1,15 30:20 31:16 32:10, 22 35:1,13 38:6,20 39:22 41:23 42:21 43:9 44:15 45:3 46:15 48:17 49:7 51:12,19 53:2 57:12 62:23 63:20 64:5 65:20 67:22 68:14, 22 70:2,20 71:5 75:5,16 76:6 77:18 79:5,15 80:12 82:16 89:10,19 91:16 93:2 97:20 101:24 105:16 106:13 107:9,22 109:21 111:4 112:9 115:4,11 117:8 122:9 125:25 128:14 129:1 131:14,24 132:20 133:23 134:20 135:18 138:13 144:12		good 40:2 56:9 57:16 65:1 69:3 75:24 84:7 85:15,19, 21 86:3,4 87:4 88:7, 10,12,13 97:5 98:11 101:7,8 110:7 116:17 120:16 121:25 144:15 147:24 148:25 174:13 180:18 183:2 219:5 227:15,16,20
features 27:14,16, 18,19	finest 120:9	finished 151:21		goodness 146:8
featuring 76:13 168:22	finish 48:10 226:8	fire 170:4 183:12		
	fit 40:9			

Gordon 106:4 112:17	growth 71:13 163:8	happy 84:18 159:10, 12 177:18	81:12 99:11 146:21 170:19	How's 133:7
gosh 147:14 148:20	Guardian 125:7	harassment 212:19	highlighted 21:3	Howard 91:24 92:2, 4,8,11,14,16,22 93:16,18,25 94:4,7, 10,11,13,19,24 95:5, 8,10,14,16,19,24 96:1,11,17,21 97:6 98:17 99:7 102:24 103:2
gotta 171:6	guards 120:17	hard 113:9 140:5,19 141:8 143:2 170:18	Hillary 205:14	HR 213:18
government 143:6 215:21	Guatemala 139:23 140:21	hard-telling 46:7	hired 54:8	Hudson 71:1
grab 85:11 89:6 91:8 105:23 106:10 107:18	guess 11:12 12:12 13:3,4,19 16:5 23:18 24:17 25:24 29:8 38:14 40:1 45:22 46:21 48:13,21 52:23 54:16 55:7 64:2 66:1 67:19 75:13 76:2 78:25 90:13 101:16 103:6 108:13 117:3 121:21 122:23 123:8 126:8, 24 130:2 131:9 134:15 135:10 140:2 158:5 159:2,14 185:18 186:18 194:18 199:3 209:14 223:13 226:25	Harder 211:22	hiring 141:22 151:8 181:13	hug 52:1 86:16,18, 22
grabbing 106:23	guessing 176:8	harm 125:20,21	Hispanic 142:12	huge 142:4 165:19
grams 33:10	guest 147:10	HASSELBECK 100:12	Historically 59:2,23 60:13 65:10	hugged 170:17
grand 60:20 129:11	guidance 164:4	hates 28:16	history 59:17,25 107:5 119:6	human 29:18 33:6, 16,21
grant 164:3,5	guidelines 197:3	hating 91:2,3,4	Hmm 99:12	hundred 15:4
graphic 114:7	guilty 28:1	hatred 118:21	hold 43:4 178:13	hundreds 89:22 198:7
grassroots 74:12 75:3 80:19 104:13 150:21	guy 79:11 95:20 136:10 170:23	HBCUS 27:21 60:18,25 65:11 68:3	holding 15:18,20,24 16:2,5,8,10,15 17:8 23:19 24:19 25:9 26:12 33:22 37:25 44:3 53:11,22 54:17, 22 55:2 58:9	hurt 95:12
grateful 23:3 24:14 39:16 149:4	guys 74:10	he'll 149:13 160:21	Holdings 26:8 38:9	hurting 121:12
gratitude 52:5	<hr/> H <hr/>	head 40:24 89:21,24	Holding's 55:18	husband 63:12 204:25 205:14,21
great 41:13 45:18 47:5 51:1 59:15 74:17 83:6 104:17 113:17 133:10 143:17 144:14 147:7 149:2,15 150:2 151:13 178:16 179:9	hair 95:4 110:7	Health 139:19 141:12	Hollywood 82:11 102:20 105:13 138:23	hypothetical 11:17 12:15 19:24 20:8 28:25 29:14 31:16 32:10 34:22 35:1,13 45:25 48:18 49:6 50:11,22 77:18 79:16 88:24 89:11 91:11,15 93:1 97:21 101:23 103:10 105:15 106:1,12 107:21 109:21 122:8 123:15 125:24 129:1 131:13,23 132:20 134:19 135:18 138:13 165:6 167:22 168:11,25 173:18 205:2,25 207:12 209:8,20 210:17 220:13,25 221:15 222:19 223:7 224:8 226:15
greater 48:14 49:3, 6,11 50:9,10,18 60:10	half 94:20 179:25	heard 30:4 74:16 75:1 80:24 81:18 104:16 106:7 162:7, 10,12,13 173:8 199:4 210:2	home 6:19,20 140:24 147:22	idea 94:18
greatest 45:13 46:11,25 47:11 48:7, 8 49:13 52:4 94:14 143:20,21	handle 85:25	hears 148:18	homeless 56:2 64:19	ideas 142:24
green 21:24	handling 177:24	heart 52:4,21 55:18, 20	homeschool 147:4	
grew 139:21 140:10	hands 30:3	heavily 41:15 76:13 83:18	homeschooling 146:18	
grief 110:7	handsome 88:12	heightened 197:23	honest 102:12	
gripe 100:4,6	handy 184:18	held 213:25	honestly 130:24	
ground 120:4	happen 59:21 141:4	hell 171:13	honey 140:10	
grounds 193:1	happened 82:13 171:11	helped 67:20 141:22	honor 164:17	
group 38:4 59:4 75:23 130:9,11	happening 120:25 143:9	helping 12:2 75:20, 21 121:24 135:9	honored 23:2 30:5	
groups 38:1 118:15 130:5,12,16,18 132:17	happiness 143:24	heritage 129:13	hope 56:3 64:20 170:3	
growing 140:21 141:12		heros 146:12,20	host 200:24	
		hesitated 16:16	hostile 118:16	
		Hey 74:10 80:18	hot 84:23	
			Hottie 84:1	
			hour 94:20 203:17	
				<hr/> I <hr/>

identical 147:3	176:1,6	224:1,20	instruct 13:7 14:12 17:5 91:17 145:22 210:10 212:4,14 213:1	213:18
identification 25:6 33:3,19 39:6 41:8 43:18 52:12 56:17 58:25 69:20 71:17 73:9,23 74:20 81:3, 21 88:16 92:20 97:15 101:11 104:20 113:22 116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	impropriety 176:15	indictment 224:3	instructing 8:7	involve 177:21
identified 25:5 33:2, 18 39:5 41:7 43:17 52:11 56:16 58:24 69:19 71:16 73:8,22 74:19 81:2,20 88:15 92:19 97:14 101:10 104:19 113:21 116:24 119:9 121:3 125:3 128:7 131:3 133:14 136:24 144:1 150:8 158:23 159:3 164:20 167:3 171:23 184:23 216:21	improving 163:3	individual 28:17 35:16 36:21,23 37:2 40:1 42:16 46:9 57:14 72:21 126:6 127:14 172:16 195:5 197:17 204:6 207:20	instructions 227:21	involved 67:5 68:24 160:3,5 164:8 176:22 194:16
identify 27:1 44:24 165:18	in-house 214:12 216:3	individually 80:2	instructs 8:11	involvement 175:13 177:15
ideological 118:6 122:3	inaudible 83:14,17 127:19	individuals 31:7 34:17 37:9 42:6 76:21 77:23,25 78:20 80:8 127:8 129:4 130:5 135:6 161:10 195:5	intelligence 222:10,11 225:5	involving 182:20
ideologies 142:17	incarcerated 31:14 66:22,23,25	individuals' 194:10	intent 13:10	irrelevant 12:15 13:7 17:2 145:21 173:3,17 205:3 206:18 209:7
idiot 220:21 222:11 224:20	incarcerating 166:19	infiltrate 142:17	intention 173:24 202:25	isolate 126:16 192:21
image 139:2,3 201:1	incarceration 166:22	inflow 10:21	intentional 54:18	isolated 42:5
imagine 79:11 128:6 142:23	incident 126:4	influences 182:25	intentionally 54:15	issue 47:21 89:22 100:14 116:11,12 121:23,24 135:13,14 156:21 162:9
immigration 118:22 119:4	include 17:14	influential 128:23	interest 96:4	issued 119:1 191:25 192:2
impact 164:17	included 154:17	information 166:3 186:4,19 190:13 194:3 203:9 208:4 210:8 212:2,12,23, 24 213:3 214:7 215:24 223:23 225:7	interesting 99:18	issues 40:16,18,20 41:15 43:6 81:9,16 163:2 196:14 213:22 226:20
impairs 136:19	including 66:8 167:18 177:7 214:12 216:3	infringe 227:3	internal 38:11	Ivanka 92:5,9 93:15 99:15,17 100:16,18 101:16 102:8 116:10 117:21 162:23 163:4,6,21,24 164:15
impeachment 176:17 200:23	inclusive 69:14	initiate 116:18	international 121:16	<hr/> J <hr/>
importance 7:9 60:13	incomplete 11:16 12:15 19:23 20:7 28:25 29:13 31:16 32:10 35:1,13 45:25 48:17 49:5 50:11,22 77:18 79:15 88:23 89:10 91:10,14 92:25 97:20 101:22 103:10 105:14,25 106:12 107:21 109:21 122:8 123:14 125:24 129:1 131:12,22 132:20 134:18 135:18 138:13 165:5 167:22 168:11,25 173:18 205:2,24 207:11 209:7,20 210:17 220:13,25 221:15 222:18 223:7 224:7 226:14	initiatives 163:23	international-born 121:13	J 106:4
important 59:4,14, 24 60:1,9,14,15 66:20 76:21 115:15 142:1 143:12 171:20	incorrect 108:15	inmates 24:7 27:3,4	Internet 72:18	Jack 166:14 167:15 168:4
improprieties	increase 68:10	innovate 141:14 143:3	interning 218:4	Jackson 69:11,24 70:9,13,15,25 72:23
	incredible 97:11 112:25	insensitive 134:12 172:17	interpretation 187:21	Jackson's 70:17
	incredibly 59:24 116:17	inserted 157:19	interrogatory 203:9	Jacksonville's 62:13
	indicating 111:13	inside 99:24 100:3, 17 102:20 194:7	interrupt 98:1 111:19 176:3	James 49:15
	indicted 223:19	insider 127:10	interview 199:6	January 113:4 159:7
		insinuated 90:15	intimate 195:23	Japan 133:6
		inspecting 97:1,2	invalidating 192:1	Japanese 135:5,6
		Instagram 43:21 73:14	invest 57:9	
		instance 36:8	investigation 176:16 200:23 218:14,20	
		instilled 140:25	investments 56:7 64:24	
		institutions 59:24	invite 147:10	
			invoice 213:13,22, 25	
			invoices 10:22	

likes 95:20	Louise 217:22	202:20 204:25 208:14	52:12 56:17 58:25 69:20 71:17 73:9,23 74:20 81:3,21 88:16 92:20 97:15 101:11 104:20 113:22 116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	meet 42:6 130:25 149:18
limited 11:7,10 141:18 161:16 162:15	love 23:8 87:11 140:5 148:17	makes 108:5 120:18,19 170:19 180:23	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	meeting 69:15 94:25 204:8,22
Lincoln 106:17	lovely 133:9	making 10:19 104:14 113:16 137:20 143:5 191:19	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Melania 86:21 204:24 205:14,16,20 206:16
link 17:19	low 113:13	man 31:14 84:9,18 95:2,3,5,8 149:10, 11,12 170:2,5,6,10 171:6,8,11,12	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	member 45:17 47:4 74:15 111:12,21 112:2,6 114:7,15 128:20
list 130:12,18	low-income 56:12 65:4 68:6	man's 136:21	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	member's 111:24
literally 24:8 166:16	lowest 163:9	Manafort 223:25	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	members 116:2 118:14 181:21 187:20 199:5 223:13
litigation 175:17	luckily 88:3,8	managed 11:8	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	memories 39:16
live 50:1	Luther 48:25 49:1,3	management 14:20	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	men 96:24 114:21 150:5 166:20
lives 23:9,10 60:11 163:3 202:21	luxury 169:21,23	management-level 223:15	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Mensch 217:22
living 56:10 65:2	<hr/> M <hr/>	manager 224:4	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	mention 144:6
LLC 211:22	M-E-N-S-C-H 217:23	manages 9:13	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	mentioned 144:4 145:4
loan 141:21 146:2	Macomb 146:13	managing 10:18 11:10	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	MEREDITH 100:13, 23 101:1,3
located 6:17	made 15:18,20,24 16:2,4,7,10,15 17:8 23:19 24:19 25:9,13 26:7,11,19 27:2,10 30:6 31:8 33:22 34:4 37:25 38:8,13 44:3, 24,25 53:11,22,25 54:7,11,17,21 55:2, 17 70:25 106:9 123:9 126:16 145:3 149:7 164:2 174:22, 24 176:22 177:2 189:25 192:23 193:14 220:10	Manigault 18:19 19:1 26:19 27:2,10 30:18 31:9 32:6 36:25 38:1,18 40:15 44:11,23,25 52:19 57:7 58:20 62:15,16, 20 63:6,8,11,25 66:9 70:24 77:1,9 82:6 104:8 105:1,2,3 110:5,10 117:6 125:22 126:10,16 128:9 144:6,22 145:2 151:5,20,25 152:4 153:23 154:7 157:3,8 160:3 161:20 162:9 165:3 167:8 177:4 185:2, 21 186:11 187:25 192:24 196:8 197:1, 22 198:1,6,17 199:25 201:4,5 202:8 204:14 210:24 211:25 212:10 213:4 224:17 227:19	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	message 17:18 36:4 52:9 56:14 65:6 75:25 76:20 115:1, 16 117:5 167:1,10
location 57:1,3	Madeline 139:18,23 140:3,10,12,14,25 141:11 142:21 143:14	maximum 197:9	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	messages 79:1
logo 98:16,18	MAGA 45:10	Mcdougal 194:15	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	messaging 66:2 79:25 119:14 167:8
lone 110:4,9	magazine 99:15,24 100:3,17	Mcmaster 222:10	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	met 130:25
long 16:1 19:1 45:15 46:18 47:1,2,12 56:4 64:21 80:9 93:8 112:21 146:8 171:13 219:19 220:3 223:17	magnet 85:7	meaning 8:5 135:11	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Mexicans 121:10 122:2
long-standing 101:18,24 102:7,10	main 23:11	means 59:15	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Mexico 120:10,21
longer 15:16 16:18, 20,21 124:10 203:18,19	maintain 44:4	media 15:13,18,20, 22,24 16:2,4,7,10, 15,18,23,24 17:8,12, 14 23:19 24:19 25:9, 13 26:8,11 33:22 37:20,25 38:8,10 44:3 53:11,22 54:7, 8,11,17,21 55:2,17 109:13,17 122:22 123:4 125:7,18 126:17 127:4,7 134:11 137:2,5,25 138:5 142:14 162:19 167:18 174:24 175:24 176:23 177:2 192:23 194:17 225:20	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Michael 49:13 183:12
looked 98:3	majority 80:3 113:5 170:10,25	manufacturing 142:5	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Michigan 146:13
Lord 170:23	make 12:22 28:6 32:13 36:14 39:16 58:22 59:21 60:25 69:17 86:14 97:4 113:10 115:9,16 141:4 160:19 177:21	march 60:17	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	microphone 182:10
Lord's 172:25 173:14	majority 80:3 113:5 170:10,25	marked 25:6 33:3, 19 39:6 41:8 43:18	116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Middle 120:23
lost 173:13 174:21 176:14 218:3	make 12:22 28:6 32:13 36:14 39:16 58:22 59:21 60:25 69:17 86:14 97:4 113:10 115:9,16 141:4 160:19 177:21		116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	Mike 59:11,12 180:8
lot 10:21 11:9 12:9 51:2 53:11,22 61:7 66:20 79:12 82:2 87:12 108:3 127:4, 10 143:7,8 170:9 180:5 182:24 194:2 200:9 202:21			116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	milestone 141:20
lots 120:13			116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	millennial 142:13
loud 69:6			116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	millennials 142:18
Loudon 81:12 82:2			116:25 119:10 121:4 125:4 131:4 133:15 136:25 144:2 150:9 158:24 159:4 164:21 167:4 171:24 184:24 216:22	

million 17:9 37:12, 24 53:25 164:2 211:23 225:11	Monday 137:15	named 123:21	209:11,16,17 226:19	136:9 148:13 149:17
millions 163:3	money 9:13 38:9 53:12,23 126:25 127:4,17,25 128:4 225:8 228:21 229:3	names 194:16	negatively 200:1	niece 112:3
mind 8:9 13:5 115:9, 17 190:2	month 59:15 152:2, 5 160:25 161:6,10 177:5 178:21	Nancy 83:15	neglected 56:7 57:10 64:24	night 112:16 136:3 169:9,10,13 227:16
minds 113:10 138:9 139:10 194:10	monthly 55:1,9	narrative 17:25 18:2 23:22 35:20,23 36:1,2,5,14,22 77:11,14 78:24 79:2 80:9 102:7,10 108:14,16 109:13, 17,24 122:20,21 124:2,5 125:12 126:12 127:5,7 128:4,23 131:11 132:17 138:18 145:6 165:12,13,15,16,17, 22 166:1,5 167:19 168:7 178:23,24 195:8 200:17 204:15 225:9,13,14	negotiated 55:3	noise 98:12
minimum 131:8 134:11 164:2	moral 141:8	narratives 125:18	negotiating 133:5,6	noises 170:19
minor 14:21	moron 221:6,12 224:20	Nat 62:13	nephew 150:14 180:9,11,12,14,16, 17,21	nomenclature 25:3
minorities 71:25 72:17 164:8	mother 140:20 143:15 146:13,16 147:1,2	nation 104:13 113:1 135:9 164:18	nervous 170:21	non-counsel 156:2 219:24
minority 76:3	mothers 113:2 149:23	nation's 23:14 60:16	network 75:23 110:23 125:18 126:6 200:24	nondisclosure 214:4,16 215:10 219:19
minute 30:9	mouth 181:11	national 222:9,14	networks 82:20 108:12,14,23 109:24 110:22 125:21 127:1,2,11,13 200:16	nondisparagement 214:4
minutes 57:25 58:4 69:11 103:25 139:14 179:2 203:18,19,21 219:2,3,13	move 29:23 55:24 69:3 80:15 133:2 139:13 153:9 205:12	nationality 122:24	Newman 18:19 19:2 26:19 27:2,10 30:18 31:10 32:7 36:25 38:18 40:15 44:11, 23,25 52:19,22 57:7 62:15,16,20 63:6,8, 11,13,14,25 66:9 70:25 77:1,9 82:6 105:1,2,3 110:5,10 117:6 125:22 126:10,16 128:10 144:6,22 145:2 151:5,21,25 152:4 153:24 154:7 157:3, 8 160:3 161:20 162:9 165:3 167:8 177:4 185:3,21 187:25 192:24 196:8 197:1 198:1,6,18 199:25 201:4,5 202:9 204:14 210:24 224:17 227:19	normal 7:20,21 12:24
mischaracterizes 42:7,21 43:9 45:3	moved 73:5,6 83:8, 9,18,22 88:21 105:23 106:9	nations 51:16 124:18 138:25	newman's 38:2 58:20 104:8 144:9 186:12 197:22 211:25 212:10 213:4	Northern 14:23
misconduct 212:19	movement 81:17 136:19	nationwide 74:12	news 82:20 108:12, 14,15,23 109:13,24 110:6,11,21,23 113:4 126:6,25 127:1,11 131:8 167:14,18 168:3 200:16 225:20	note 148:17
Misleading 100:12	moving 33:5 39:3 73:1 106:18 107:18 199:2	naw 169:19	nice 83:21 85:17 86:8 87:2 100:18	Nothing's 61:18
missed 39:15	Mueller 176:16 200:23	NDA 126:9 127:2 154:10,12,21 156:8, 12,14,15 158:2,6 160:6 185:20 186:3, 7,9,12,16 190:2 191:18 199:14 206:24 207:8 213:5, 14 215:20 220:1,10 226:10,23		noticed 144:4
missing 203:5	multiple 40:24 44:7 89:25 91:6 98:3	needed 32:6 33:14 38:16 105:12 108:16 156:11 171:14 204:13		November 74:13 80:24 81:15 104:15 146:15 220:20
mission 61:12	mushroom- shaped 195:11	negative 21:3 29:9 123:3 131:8 138:22 169:3,5 175:24 176:7,10 178:24 182:13,16 187:18 197:22 200:25		nude 100:8,9
misstate 78:3	music 73:20	negative 21:3 29:9 123:3 131:8 138:22 169:3,5 175:24 176:7,10 178:24 182:13,16 187:18 197:22 200:25		number 24:18,25 25:8 26:8,13 29:23 30:16 31:1 39:4 40:14,16 44:20 45:7, 21 51:24 52:15 53:9 55:24 58:7 62:19 64:12 71:20 77:7 104:25 117:4 121:22 139:1,14 154:19 164:23 185:15 187:10 189:16 193:4,9,17 194:14 196:6 199:2,7,18 202:4,5,6 214:21,24
misstates 53:14,15 55:4 66:12 67:22 78:6 79:3,22 93:1 123:15 128:11 131:14 135:15 139:5 144:23 161:2 173:3 181:2 191:10,11 213:6,7	Muslims 123:10,11 136:5	negative 21:3 29:9 123:3 131:8 138:22 169:3,5 175:24 176:7,10 178:24 182:13,16 187:18 197:22 200:25		numbers 58:21 199:5
Mnuchin 220:21	mute 178:5,10 190:10			numerous 164:13
mock 134:2 136:6 138:23	muted 178:6,7			nutritional 139:20
mocked 222:10				
mocking 135:11,21, 24 138:24				
moderates 143:7				
Mohammed 70:25				
mom's 139:23				
moment 39:11 59:14 63:1				
	N			
	N-WORD 218:16, 17,21			
	naked 190:22			
				O
				oath 6:9 7:16
				Obama 50:8,18,25 51:9 106:23 123:21

146:14 166:14,15	obligation 96:15 186:18,21	194:19 205:13 208:21 209:16	organization 114:14	parents 163:13,16, 17
Obama's 123:21	obsessed 199:2	ongoing 208:1	organizations 132:11	Paris 80:18
object 8:4,5,23,25 9:1 192:25	Ocasio-cortez 142:15 144:5	online 74:14	organizes 15:21	parole 33:12
objection 8:8 11:16 13:6,12,23 14:11 17:2 19:10,23 20:7, 15 24:20 29:13 30:19 40:19 41:22 42:7 43:8 45:24 46:13 47:14 48:9,16 49:5 50:10,21 51:11 53:14 55:4,19 57:11 66:11 70:10 71:4 75:4 76:5,15 77:2 78:6 79:3,14,22 82:14,23 88:23 89:9, 18 90:4 91:10,14 92:25 97:19 98:22 101:22 103:9 105:5, 14,25 106:11 107:8, 20 110:18 111:3 115:23 117:7 119:17 121:14 122:7 123:14 128:11 131:12,22 134:4,18 135:15 137:7,18 139:5 144:23 145:11,21 151:16 155:2,17 156:5,17 157:20 159:17 161:2 165:4 166:7 167:9 172:19 173:2,16 175:1,7,14 179:18 180:4 181:2, 22 182:21 183:15,21 186:5,22 187:14 189:17 191:10 192:8,17,20 194:22 195:13 197:4,11 198:11 199:10 201:6 202:10 203:20 204:2 205:23 206:25 207:10,18 208:2,16 210:6 211:13 212:1, 21,22 213:6 214:6 215:22 216:10 217:2 219:20 220:12,23 223:20 224:7,23 226:12	occasions 89:25	open 21:18 147:20	original 158:2 228:23,24 229:6	part 13:18 55:13 68:16 77:10,21 90:13,14 110:22 133:20 134:16 149:24 156:16 160:1 165:16,18,20,21,23 166:1,4 167:19 178:22 180:10 189:22 195:7 199:12 200:14 204:7
objections 8:24 14:12 27:5 106:20, 25 115:18 132:5 137:14,20 190:11 192:14 193:5,11,18 209:18 212:11 214:25 221:8,23 222:5 227:7	occurred 98:6	opening 114:7	outflow 10:22	participated 163:4
	offered 56:5 64:22 151:25 159:25 161:1,5 177:4	operating 227:25	outrageous 101:3 136:21	partners 116:15 121:25
	office 6:19 67:3 138:20 142:7 170:6 188:17	operations 9:18,19, 20,21,25 10:8,9,13, 17,20,24 11:1,5 121:8 153:20 192:6 202:7 206:23 212:17	outreach 159:10	parts 91:9
	officer 6:25 8:21 9:6,9,12,18,19	operative 191:5	oval 142:7	party 228:16
	official 45:17 47:4 74:15 207:21	opinion 19:13,15, 18,20 20:5,12 37:14, 16 38:2 45:23 46:3, 8,12 47:13,22 50:17, 20 51:6 52:15 70:17 88:20 89:1,2,13,14 90:3 91:6 97:22,23 101:18,25 103:7,11, 14,18 123:17 126:1 131:16,17,21,25 132:1,6 133:19 134:5 137:12 138:8 167:11,12 172:11 189:21 191:14,25 192:10,11 193:7,12 197:21 198:6 205:22 206:2,7,12 220:3,11, 14 222:6 224:9 226:5,11,18	overdo 118:7	pass 34:23
	officially 113:5	opinions 41:20,21, 24 44:12 65:25 122:5 227:3	overhear 162:3 204:7,11	past 67:14 173:25
	officials 224:19	opportunities 69:12 131:7	overheard 162:16	Pastor 45:9 46:10
	Omarosa 17:25 18:18 19:1 23:23 26:18 27:2,10 28:1 30:18 31:9 32:6,19 36:24 37:4 38:1,17 40:15 44:11,23,25 52:19 57:7 58:12,16, 20 62:15,16,20 63:25 66:2,9,16 70:24 77:1,9 82:5 89:16 90:14 101:13, 14 104:8 105:1,2,3 110:5,9,22 114:19 115:8 117:6 125:12, 21 126:10,16 127:1, 8,9 128:9 139:3 144:6,21 145:1,3,6 151:5,20,25 152:4 153:23 154:6,12 156:11 157:3,8 160:1,2 161:20 162:8 165:2 167:8 176:13 177:4 178:20 185:2,20 187:24 188:4 190:24 194:6 196:7 198:17 199:24 200:10 201:4 202:4, 8 203:25 204:14 206:13,22,23 210:24 211:24 212:10 224:17 225:9,18	opportunity 56:6 59:16 61:13 64:23 141:6 166:23 228:3	overregulation 143:2	pastor's 48:13
	Omarosa's 28:8 41:5 43:15 165:16 185:4 190:25 191:7	opposed 126:17	overtaxation 143:2	path 23:14
		opposite 135:12	overturned 145:20	patience 219:11
		ops 196:4	overwhelming 39:8	Paul 223:25
		order 53:9 56:21 58:10 59:3 60:12,24 65:11 143:22 195:8 228:11	owner 15:25 16:1 96:15,25 139:24 146:16	pay 8:8 72:20 172:25 178:20 197:2 198:1,6,18,22 213:21 228:9,17,18
		ordering 228:8,20, 23 229:6	p	paying 173:14 177:3,7
			p.m. 104:6 174:17 179:5 219:7 229:11	payments 72:14 213:4
			pageant 94:24 96:15,25	payroll 213:4
			paid 10:23 25:13 26:15 34:1,8 35:18, 19,20 37:11 44:5 71:21,25 72:9 161:10 172:1,17 198:16 211:22 212:7 213:14	peace 116:22 119:16
			Palm 83:9	Pence 59:12 146:11, 23,25 147:7,9 149:7, 20,22 150:12 154:17 180:9,24 181:12,20 200:3
			paper 176:4	Pence's 180:8
			papers 182:7	pending 175:18 177:20 207:17
			paragraph 154:23 155:4,12,15 157:12, 14,17,18 158:6,9	penis 195:12 200:21
			paraphrased 132:15	

Pennsylvania 146:17,25 148:24

people 7:22 11:7 29:10,11,20 31:3 36:14,16 42:17 45:14 46:11 47:1,12 48:15 49:4 50:9 56:10 57:4 61:7,13, 15 65:2 73:5 78:4, 16,23 79:12 80:2,4 118:6 120:10,12,16, 20 122:23 127:12, 18,21 130:1 133:6 135:12 143:8,19 148:22 161:16 162:16 163:13 170:10 171:5,9 200:24 214:15 215:9 217:8 218:10,11

people's 227:3

percent 15:4 71:14 112:23

percentage 54:12, 24 68:10

perfect 7:6 94:3

period 12:20 143:21 150:16 194:16

permanently 27:21 68:3

person 32:19 72:20 82:3 128:7 160:5 171:19 196:3 197:9

person's 186:17

personal 18:13 128:15,17 134:9 141:7 163:11 164:11 194:2 199:17 213:19 218:19

personally 126:22 127:15 147:11 191:17 216:7 218:14

perspective 194:12

Philips 6:4

PHILLIPS 6:4,12 8:19,22 9:3,5,8 11:20 13:1,9,13 14:3,14 17:6,7 18:25 19:7,12 20:3,11,17 21:12,13,20,21 22:2, 6 23:17 24:16,22,23 25:1,7,16 26:25 27:7 28:5,19 29:4,22 30:14,24 31:20 32:3, 18,25 33:4,20 34:3, 10 35:8,17 37:21,23 38:12,23 39:3,18 40:5 41:1,5,19 42:3, 12,25 43:13,15,19 44:19 45:6,20 46:4, 19 47:7,19 48:11,12, 24 49:18,25 50:15 51:8,15,22 52:13 53:7,20 54:25 55:10, 24 56:18 57:19,23 58:1,3,6,19 62:11 63:2,6,9,14,16,23 64:10 65:8,23 66:18 68:1,18 69:2,21 70:5,12,23 71:9,18 73:10,24 74:21 75:12 76:1,10,24 77:6 78:2,11 79:9,19 80:6,14 81:4,22 82:21 83:3 88:17 89:5,15 90:1,10 91:12,19,20 92:21 93:11 97:16,24 98:24 101:12 102:5, 15,19,23 103:5,15, 24 104:1,4,7,21 105:10,20 106:6,16, 22 107:1,4,11,14 108:6,22 109:4,25 110:16 111:8 112:13,17 113:23 115:7,14,21 116:4 117:1,12 119:11,23 121:5,19 122:14 123:6 124:1,8 125:5, 19 126:7 127:6 128:1,5,19 129:5 131:5,18 132:2,8,25 133:16 134:1,7 135:3,22 137:1,13, 17,21,24 138:21 139:12 144:3,20,25 145:14,16,24,25 146:7 150:10 151:17 152:14,22 155:6,10, 25 156:9,23 158:4, 18,20 159:5,24 160:18,24 161:4,12, 25 164:22 165:10 166:11 167:5,13 168:2,15 169:7,12 171:25 172:22 173:4,21 174:6,9,14, 18,20 175:4,8,21 176:4,24 177:23 178:1,5,13,17 179:3, 9,12,13,23 180:7,18, 20 181:8 182:1,3,9, 11 183:1,9,17,25 184:7,25 185:13 186:1,9,15 187:8,22 188:7,12,23 189:3, 12 190:5,18 191:4,6, 21 192:12,18 193:3, 8,13,22 195:9,14,21 196:23 197:8,15 198:25 199:1,22 200:18 201:14 202:15,22 203:10,13 204:12 205:5 206:10,21 207:7,15, 22,24 208:8,21 209:1,2,13 210:1,11, 12,20 211:8,20 212:5,6,15,16 213:2, 15 214:14,23 215:2, 8,17 216:6,14,18,23 217:6,21 219:1,6,8,9 220:2,8,18 221:4,10, 19 222:1,8,22 223:12,24 224:14 225:15 226:7,21 227:10,17,23 228:6, 12,19 229:1,3,7

Phoenix 6:18

phone 73:16 162:7, 8,10,18

phony 83:24

photos 100:9

phrase 133:2 158:9

picture 57:5 100:1

pictured 58:13,16

piece 93:18,19 97:18 176:13

pieces 67:17

pillars 60:18

pinpoint 195:4

place 119:3 170:14

placement 54:10,12 181:18

Plaintiff's 33:1 69:4 150:11

planet 94:14

planning 176:25

plants 73:5

platform 73:15 181:19

play 21:7 58:18 64:16 124:12

Playboy 99:15 100:11

played 60:15 102:18 108:1,12 112:14 134:10 166:1,5 226:9

player 49:14

playing 22:21 23:16 24:4 29:24 30:13 31:23 33:7 39:7 45:8 46:23 51:25 56:1 59:1 64:18 69:10 71:12 73:3,19,20 74:9 80:17 81:11 83:5 91:23 93:13 99:10 104:10 112:19 116:9 118:3 120:2 124:13 129:7 133:4 135:25 139:15 146:10 162:22 166:13 169:15

pledge 61:11

point 9:24 18:13 40:15 57:8,17 78:12 129:12 150:20 154:12 198:18 201:3 203:6,24

police 145:8

policies 34:20 41:10,16 42:16 44:21 45:1 51:3 113:11 115:9 162:25 163:2

policy 115:17 116:17 122:1

political 11:13 12:12 106:7 119:15 139:17 142:16 197:10

politically 41:10

politics 25:19 138:11 171:2,3,4

poll 38:24

polling 37:13 38:9, 11,22,25 68:25 121:9,11,20,21 122:6 126:4 196:20

poor 136:10

portion 20:20 53:24 212:9

portions 62:18

portrayals 138:22

portraying 28:1

posed 99:25

position 165:24 201:23

positions 164:13 223:16

positive 164:17

possibility 33:12

possibly 34:15 45:11 157:6 194:5

post 216:24

potential 153:19

potentially 138:23

poverty 140:22

power 60:8,9,10

powerful 95:5,8 170:4

PPP 141:21 146:1

praying 148:18

precursor 177:14

predator 92:10,24

predators 92:11

predatory 107:6

prefer 8:4

preferential 28:20, 23 29:10

preferring 29:11

premature 190:13 193:20

prerequisite 45:22

presented 152:17 160:2

preserve 143:14,22

preserving 8:9

presidency 45:16 47:3

president 6:22 9:12 10:17 12:4,11 13:3, 21 14:10 16:7,12,14,

- 18 17:10 18:1,8,10
22:22 23:1,7,8,12,25
24:10,11,14 27:13
28:9,12 30:6 31:2
33:15 36:15 38:14,
16 45:12 47:23 48:1,
3 50:25 51:2,3,9
52:5 55:3 56:6,10
59:11 64:23 65:2
66:6,17 67:3,13
71:25 72:15 74:13
75:20 76:23 78:20,
24 80:23 81:14 82:8
104:14 108:9,10
110:24 112:23,25
113:6,7,12,17
123:23 124:14,17,
19,20,23 125:1
126:5 138:18 141:9
142:1 143:17 144:19
145:18 146:14
148:3,11,24 149:5,
16 150:1,23 152:16
153:21 162:24
163:20,24 164:10,16
166:16,20,21,24
168:17,18 172:2,18,
24 187:19 189:25
197:24 198:3 209:4
212:18,20 215:3
221:12 222:3,15
223:18 224:6 225:10
- president's** 34:20
150:13,14 222:15
223:4
- presidential** 13:4
83:2 182:19 183:6,
14,20 197:10
- press** 176:7
- pretty** 9:13 11:6
18:4 62:14 128:4
130:25
- prevailing** 149:25
- prevails** 116:22
- prevent** 123:10
157:9
- primarily** 68:4
123:23
- principles** 118:17
- prior** 67:3 122:17
156:3 178:25 182:14
196:20 213:14
220:19
- prioritized** 163:25
- priority** 60:25 61:1,8
- prison** 24:8 39:12
- prisons** 24:7
- private** 91:9 226:20
- privileged** 156:19
- pro** 34:23 54:15,19
71:13,14 107:16
122:4
- problem** 8:6 37:21
49:15 164:7 205:7
- problems** 118:10,
11 120:4,13,14
- procedures** 119:3
- proceedings**
207:25
- process** 12:25 67:6
175:11 189:11
- procured** 98:5
- produced** 6:8 23:19
24:18,21 25:8,11,15,
21 30:16 31:1 55:17
76:12 104:9 112:15
139:13,14 169:8
180:25 181:3,9
188:16
- product** 155:18
156:18 157:21
158:12 159:18 185:7
189:19 190:12
193:1,20 194:24
208:4 210:16 211:3,
15 212:2,22 214:7
215:23 217:15
219:21
- production** 17:14
26:12,15 34:2,14
181:14
- products** 141:23
- professionalism**
9:3 201:23
- proffer** 178:14
- program** 24:8
- programs** 24:6
- progress** 60:16
- progressive** 142:24
- prohibition** 186:3
- projects** 147:25
- promise** 143:18
- promised** 31:2
- promises** 30:7 31:4,
8 48:2 51:4 138:19
149:7
- promote** 35:5 64:8
67:13 76:22
- promoted** 172:6
- promoting** 27:20
66:6,8,9 123:4
164:12
- properly** 12:23
- proponent** 42:14
- proposed** 152:23
155:1
- prosper** 116:22
- prosperity** 116:12
121:24 135:14
- protection** 120:24
- provide** 151:10
- provided** 166:3
- providing** 141:10
163:22
- provision** 188:19
189:8
- provisions** 203:3
214:4
- public** 32:12 82:7
106:9 165:16 177:8
189:23 195:15,17
200:9 201:17 205:15
224:5,8
- publications** 185:2
- publicist** 84:25
- publicity** 176:11
- publicly** 17:25
23:23 107:2 110:23
129:10 145:6 187:6,
20 191:19 200:13
209:12 221:21
225:10 226:19
- published** 203:25
- pull** 44:10 85:24
117:24 153:1 201:21
203:11 204:20 225:6
- pulled** 22:9 98:4
- pulling** 22:10 188:9
- purchase** 15:22
16:24 54:23
- purchaser** 54:8
- purchasing** 15:13
16:18
- purely** 132:15
- purple** 84:2
- purpose** 23:21
35:22,25 36:2,8,10,
12 64:11 141:1
154:6
- purposes** 217:10
- pursuant** 154:23
155:14 157:14 158:9
- push** 35:5 75:25
- pushed** 125:18
- pushing** 200:16
- pussy** 89:7 105:24
106:10,24 107:19
- put** 13:11 25:21 98:9
99:15 100:1 115:16
116:16 117:4 119:3
127:12,15,21 140:18
153:7 161:18
181:10,13 186:7
188:25 196:6 202:3
205:10
- putting** 27:14 105:8
123:4 143:23 204:9
-
- Q**
-
- question** 7:7,11 8:6
11:21 14:4,16 16:6,
17 26:9 35:2 40:11,
22 42:24 45:22
48:20,22 49:9 53:3,
17 55:25 64:7 71:6
72:22 75:8 77:4
82:17 90:6 91:18
93:4 96:9 98:11
99:14 101:16 102:1,
4 103:6 104:23
105:7 111:7 114:6
117:3 119:19,22
120:1 123:1 129:25
130:2 131:10
132:14,21,24 134:15
135:10 138:4 145:15
- 155:12 177:11,14,20
181:6,23 182:5
187:3 190:3,7 191:5
192:14 194:18 195:1
196:17,18 201:7,10
203:20 206:4,6
208:19,25 213:10
217:11 225:21 226:3
- question-answer**
7:16
- questioning** 125:8
- questions** 7:5,12,
13,18,25 8:1,13
57:22 72:5 124:21
153:17 157:18
178:14,17 179:11
185:18 189:2 191:3
201:25 203:2,17
219:14 220:19
- queue** 203:12
- quick** 98:2 103:22,
23 119:24 133:3
153:18 179:6 186:11
- quickest** 193:24
- quid** 122:4
- QUIVERS** 92:15
94:9 95:22,25 96:6
97:3
- quo** 122:4
- quotations** 189:24
- quote** 47:10 106:18
115:1,2 132:12
-
- R**
-
- race** 28:21,24 29:9,
18,21 31:6 35:6,10
36:17 78:21 80:8
90:23 133:21
- race-driven** 79:1
- races** 23:10 166:18
- racial** 164:6
- racially** 134:12
172:17
- racism** 27:13,15,20,
23,24 28:2,4,7,11,
15,24 29:7,9,11
36:21 41:3 67:2
80:3,4 90:21 123:7,
13 129:10 225:4

racism's 29:6	realize 29:6 78:14, 19 92:22 113:6 159:1	181:11	reminded 23:13	responses 203:9
racist 18:8,10 19:14, 21 20:6 23:25 27:13 28:2,9,12,13 29:21 31:12 32:13,20 34:24 35:4,9,16 36:15,25 38:2 42:19 43:7 52:16 53:6,10, 11 66:1,2,24 70:18 77:15 78:19,24 79:2 80:10 109:18 110:1, 6,11 111:14 112:7 123:25 124:19 125:1,9,13 126:13 128:21,22,24 131:11,20 132:4,13, 14,18 133:18 134:12,17 167:17,20 168:5,6,9,14,17,21, 23 172:11,12,13 184:3 225:19	reask 13:19	refers 102:7	remotely 6:3	responsibilities 10:16 11:4
racists 79:12 132:13	reason 8:2 90:14 99:1 176:14	reflect 132:11	renouncing 131:9	responsibility 7:17 12:21 141:7
radio 40:25	reasons 23:11	reform 163:6,7,12	rep 196:2	responsible 75:19
rail 113:6	recall 89:21 151:24 152:24 157:1 195:10,15	regions 119:5	repeat 42:23 44:17 132:23 165:11 208:25	responsive 144:9
rallies 12:9	received 17:8 24:8 37:24	rehabilitate 139:2	rephrase 26:10 29:3 48:22 77:4 79:8 90:9 208:24	restate 79:8
ran 15:13 164:25 181:19 195:6	recent 213:23	rehabilitating 201:1	replay 134:23 173:10	result 198:4
Rankin 56:2,5,9 64:15,19,22 65:1 74:10,11,25	recently 129:11	rehabilitation 166:21	report 184:20 188:13,14 202:12 205:8	results 182:19 183:6,13,19
rape 200:22	recipients 116:14	reject 105:2	reporter 6:1 22:4 124:14,17,19,20,23 125:1 127:22 136:7, 9,16 216:17 227:21, 22 228:22 229:5,8	retainer 55:12,14
rapists 120:15 121:10 122:2	recognize 60:13	related 28:7 40:17 41:3 65:11 101:14 108:16 117:3,5 133:21 151:20 156:2 174:23 176:1,6,7 177:9 178:20,24 184:2 186:16 219:17 224:5	reporting 180:6 182:25	retraction 136:15
rate 55:1,2 161:5	recognizes 163:15	relates 177:22 186:3 187:11 204:13	representative 189:14	retroactively 220:9
ratings 199:3	recommendation 197:25	relation 194:7 216:8	requests 54:9 186:13	review 10:23 160:16 189:1 228:4
Ray 6:7,15	record 6:2,14 8:8,9 9:14,15 58:3 104:7 131:15 163:21 177:19 178:3,8 191:11 213:7 229:10	relationship 18:14 101:15 197:23 216:8	require 152:15	reviewed 10:20 11:8
reaching 69:14	recorded 12:23 162:7,8	released 39:12 162:19 195:12	research 130:13	reviewing 10:19
read 47:9 63:18 155:8 183:3 191:24 192:2 227:23	recording 218:20	relevance 14:1 47:15 48:16 50:11 51:12 79:14 111:4 121:15 131:24 137:7 161:7 175:1,14,16 177:18 179:18 180:4 181:23 185:23 195:13 207:18 208:2,16 210:6 211:13 212:1,21 216:10 223:21	resistance 149:6	Rex 221:5
reader 193:24	recordings 82:19	relevant 17:19,21 49:10 55:8 82:5	resolved 210:5	ride 22:24
ready 86:11,12 96:23 146:14 155:9 170:5 174:4,18	records 177:8	religion 123:10	respect 23:4 118:5	ridicule 136:21
real 98:1 119:24 142:6 146:12,19 153:18 186:11	red 149:1	religiously 41:10	respond 53:10 124:20	rights 23:14 50:19 206:24 207:6
reality 163:15	reelect 45:16 47:3	reluctant 175:19	responded 6:9	rioting 143:10
	reelected 45:12 46:24 74:13 76:3 80:23 104:15 222:16	remains 23:15	respondent's 25:5 33:2,18 39:5 41:7 43:17 52:11 56:16 58:24 69:19 71:16 73:8,22 74:19 81:2, 20 88:15 92:19 97:14 101:10 104:19 113:21 116:24 119:9 121:3 125:3 131:3 133:14 136:24 144:1 150:8 158:23 159:3 164:20 167:3 171:23 184:23 216:21	rising 113:14
	reelection 81:15 152:13 221:13 222:4 223:6 224:5	remarkable 163:10	response 138:15	risk 69:17 183:3
	reemployment 162:2	remember 85:23 136:11,12 153:3 195:19		RNC 11:25
	refer 124:17 172:23			road 208:20 227:6
	referenced 113:25			robberies 30:2
	referred 220:21			ROBIN 92:15 94:9 95:22,25 96:6 97:3
	referring 24:17 28:7,8 30:15 45:21 62:19 71:19 97:17 108:24 110:18			role 6:23 8:16,20 15:23 26:7 39:1 60:15 68:17 127:10 150:15 151:1,12 152:10 178:18 179:16,22 181:12
				roles 9:16 11:3 15:6 121:7 150:19 151:9
				room 133:7
				Rose 184:19 198:13, 20 203:7 205:8

Rose's 188:12,13, 14 197:21,25	scroll 153:18 155:4 159:8	Sean's 179:7	82:8 88:22 89:8,17 90:3,17,19 97:18 103:8,13,16,17,19 108:21,25 109:14 110:6,11 115:22 166:5,6 190:17 225:4,19 226:11	showing 116:19 218:6
rough 44:6	Sean 6:7,15 12:16 18:19,23 19:5 20:1,9 25:12 26:23 29:2,16 30:21 31:17 32:11, 23 33:25 34:7 35:3, 14 38:7,21 39:24 40:21 41:25 42:9,22 43:11 44:16 45:4 46:2 47:17 48:19 49:8 50:12,23 51:13, 20 53:4,18 54:20 55:6,21 57:13 62:24 64:6 65:15,21 66:14 67:23 68:15,23 70:3, 21 71:7 75:7,17 76:7,17 77:3,19 78:8 79:6,17 82:18,25 89:1,12,20 90:7 93:5 97:22 102:2,11 105:7,17 106:2,14 107:10,23 108:20 109:22 110:14 111:5 112:10 115:5,19,25 117:10 119:20 122:10 123:2,17 125:16 126:1,21 128:1,13 129:2 131:16,25 132:22 133:24 134:5,21 135:19 137:11 138:14 144:13 146:5 152:8 153:20 155:7, 9,20 157:23 158:14 159:20 160:11 161:8,23 165:8 166:9 167:11,24 169:1 173:19 174:12 175:2,20 178:8 179:19 181:5 182:23 183:22 185:9,24 186:25 187:17 189:1,20 190:15 191:13 192:10 194:25 195:19 196:16 197:13 199:16 200:7 201:9 205:4,7 206:3,19 207:2,13 208:6,18 209:9,22 210:18 211:4,16 213:9 214:10,20 215:15 216:1,12 219:24 220:15 221:1,17 222:20 223:10 224:12,25 226:2,16 228:3	seat 133:12	sexual 92:10,11,24 102:8 107:6 200:22 212:19	shows 92:8 200:12
Roughly 10:3 17:11		secret 193:14	sexy 95:2	shrink 12:6
roundabout 32:16		secretary 163:25 220:20 221:5,11	shackled 30:3	shut 141:17 157:9
Rowe 169:22		section 174:4	shape 43:20 200:20	sic 98:15 129:6 133:3 135:23
rules 8:14 228:1,2		sections 173:23	share 118:5 184:17	side 33:6,16,21 163:11 180:2 181:14 213:21
run 11:14,25 15:12 24:6 37:12 38:16 195:7 200:14		security 116:12 222:9,15	shared 61:12	signed 62:3 67:14 74:14 80:21,24 81:17 104:16 127:2 154:7 156:11 160:10 185:20
running 12:9 146:17		seeking 116:13 117:20 126:10	Sharia 118:18 123:12	signatory 152:23 153:20 186:18
runs 15:21		self-accountability 141:2	sharing 21:14,16,19	signed 23:3 153:23 154:10,12 156:4,8 160:6 186:17 191:18 213:5,13 220:10
Ryan 6:5 21:20 109:2 137:14 138:2 178:6 179:20 201:19 203:19 208:23 219:1 227:6,24 229:8		self-reliance 140:17	sheet 174:21	signing 60:12 64:15 152:15 206:24
		selling 140:10	shell 177:2	signs 170:22
		send 103:23 130:12	SHEPHERD 99:11, 13,19,25	silent 170:10,25
		sending 120:11,12, 19 213:18	sheriff 62:14	similar 191:9 197:24
		sends 120:10	SHERRI 99:11,13, 19,25	simple 94:19 177:11
		senior 164:13,15	ships 163:7	Simply 116:16
		sense 58:22 69:16 108:5 120:19 141:1 180:23	shit 221:22 222:3	Sims 210:2,14,22 211:7
		sentence 24:9 29:7 40:1,8 154:21	shithole 51:10,17 124:18 125:9 138:25	Sims' 210:4
		sentenced 33:11	shoot 181:17	simultaneously 131:20 164:1
		separate 37:19 90:24 192:5	shopping 83:19	single 33:9 48:7 128:7 163:16
		Serge 136:17	short 99:9 194:14	sir 7:3 8:15 9:4,23 10:1,5 14:17 15:1,19 16:9,13 17:11,13,15, 22 18:11,17 19:16, 19 20:2,10,16,22,25 21:6,9,23 22:1,8,12, 19 23:20 24:3 27:6, 11 32:24 35:21,24 37:1,6 42:2,11 43:12,23 44:18 45:5 49:2 52:17 54:14
		serve 181:21	short-circuit 7:22	
		serves 164:16	shorten 39:25	
		services 17:12 159:8	shorter 133:2	
		session 7:7,16	shorty 85:16	
		set 125:10 132:14 166:20 205:9	shot 196:2	
		sets 84:13	show 66:1,5 83:20 87:11 92:8,23 93:8 94:15 96:20 98:17 99:7 134:17 171:14 199:7	
		setting 219:12	showed 30:15 107:25 108:11 190:20	
		sex 90:23 91:24		
		sexism 81:8 90:25 165:12		
		sexist 18:8 19:14, 15,22 20:14 37:4,5		

S

sad 143:4				
safe 150:3 170:15				
sat 92:4				
save 222:24 223:2,5 229:3				
saves 228:21				
scary 142:23				
scenes 87:11				
schedules 11:11				
school 14:25				
science 164:1,3				
scratching 176:2 182:7				
screaming 122:1				
screen 20:21 21:14, 16,19 32:5 56:19 58:8,9 118:16 160:13,20 184:14				
screening 118:7,8, 14 122:3				
screenshot 147:17				
script 87:24 88:2,5, 6				
scripts 116:3				

- 55:22 56:22 57:6,14
58:11,14 63:21
65:22 68:16 69:23
70:11,16,22 71:8,23
72:3,12,25 74:2,4,7,
24 75:1 78:9 80:13
81:6 82:12 102:3
106:3,15,21 107:13
110:3,15 111:11
112:1,4 114:13,23
115:6,13 117:11,14,
23 124:21 128:18
133:25 134:22
150:25 151:3,6
152:1,21,25 153:6,
10,14,22,25 154:15
157:11 158:17
159:23 162:11,20
172:15,21 173:6
175:3,12 183:4,11,
16 184:15,22
185:12,16,25 192:3
197:7,14 204:15,23
206:20 207:23
208:7,10 210:3,19
211:19 214:13,22
215:16 216:5,13
217:5,20,24 218:1,8,
18,22,25 221:9,24
222:13,21 223:3
224:2,13 227:14
- sister's** 142:9
- sister-in-law**
162:23
- sisters** 113:2
- sit** 13:2,20
- sitting** 30:9 201:25
- skin** 28:18 29:19
- skip** 119:25
- skipping** 159:2
- sleep** 95:10
- sleeping** 56:3 64:20
- slides** 159:11
- slush** 177:6
- small** 139:21,24
140:17 141:12,18
142:2,9
- smart** 113:8 114:21,
25 115:2 116:17
122:1
- Snapchat** 73:14
- sneak** 87:8
- soap** 86:11,14
- social** 73:15 75:23
- societies** 116:22
- society** 92:23
118:25
- somebody's** 134:2
- someone's** 90:22
226:20
- son** 30:5 92:9 180:9,
15,19
- sort** 97:11 228:1
- sound** 64:3 65:22
152:2 199:7
- sounded** 98:3 102:4
- sounds** 46:6 152:3
174:13 219:5
- South** 120:21 136:3
- Southern** 191:25
- space** 139:17
205:15
- speak** 18:14 120:17
146:12 187:4,5
226:19
- SPEAKER** 22:22,25
23:2,8 24:5 29:25
31:24 33:8 41:9,11,
14 46:24 52:2 59:7
60:2,4 61:2,3,4,5,17,
19 62:2,5,7,8,9
83:16 84:4,10,13,18,
19,23 92:13 120:5
124:16,22,25 169:16
- SPEAKERS** 60:23
61:22,24 62:1
- speaking** 8:24
98:25 99:2 113:15
134:3,14 135:16
137:13,17 159:9
- speaks** 214:19
- special** 59:9 61:15
147:10
- specific** 31:13
32:15 40:23 199:18,
20,24 201:12 203:25
- specifically** 18:6
23:24 31:9 32:17
46:20 104:23,25
- 105:6 117:5,9
156:11,20 165:2,5
167:7,10 201:5
202:8
- speculating** 28:10
165:25 206:8
- speculation** 11:18
12:14 18:21 19:3
26:21 29:1,14 30:20
31:15 32:9,21 34:25
35:12 38:5,19 39:22
41:23 42:20 43:9
44:14 45:2 46:14
48:17 49:7 51:12,18
53:1 57:12 62:22
63:19 64:4 65:17,19
67:21 68:13,21 70:1,
19 71:5 75:5,15 76:6
77:17 79:5,15 80:11
82:15 88:24 89:10,
19 91:16 93:2 97:20
101:23 105:15
106:12 107:9,21
109:20 111:4 112:8
115:3,10 117:8
122:9 125:24
128:14,25 131:13,23
132:19 133:22
134:19 135:17
138:12 144:11
145:12 146:3 152:6,
18 161:3,21 165:6
166:8 167:21
168:10,24 173:17
175:15 182:22 183:7
184:4 185:6,22
196:9 205:1,24
206:17 207:19
209:5,20 213:8
215:5,13 217:3,13
221:14 222:18 223:8
224:10 226:14
- speeches** 72:1
- speed** 174:3
- spend** 37:13 188:20
203:22
- spent** 16:23 38:9
54:13 126:25 127:4,
17,24 179:25 204:17
225:8,11
- spirit** 30:4
- spoke** 64:1 219:25
- spoken** 18:16 19:8
- spokesman** 136:20
117:20 140:22
145:10 164:3 179:24
221:12
- staff** 222:23 223:5
- staffer** 208:12
- staffing** 12:5,6
- stage** 142:25
- stainless** 30:3
- stake** 143:11
- stand** 22:23 41:9,16
72:1,10,15 88:11
- standard** 158:6
160:22
- standards** 198:10
- standing** 97:9
192:14
- standpoint** 175:23
- stands** 22:23
- star** 85:8 86:11,14
89:6 200:20
- start** 21:19 48:11
52:3,21 85:5,6 109:6
110:8 153:17 185:18
- start-up** 141:12,18
- started** 30:8
- starting** 21:16 81:7
142:24 147:25
- state** 6:1,13 149:1
221:5,11
- statement** 18:4
32:8 40:15 57:8,15
102:4 117:6 123:9
124:15,21 144:18
180:3 188:4,10,18,
19,25 190:25 191:7
192:15,19,21 194:19
199:18 201:13 204:6
205:13 217:7
- statements** 20:18
26:18 32:12 40:23,
24 44:24,25 82:7
89:20,23 107:17
119:13 121:9
122:13,17 144:10
185:1,5,17 187:24
188:1 189:10,25
191:9,11,20 192:7
198:2,4 200:9,15
201:17 220:10
- states** 8:5 20:4
- 117:20 140:22
145:10 164:3 179:24
221:12
- stating** 110:23
- statistics** 44:4
- status** 175:5,9
- stay** 147:20 150:3
- stayed** 171:10
- steel** 30:3
- STEM** 163:25 164:8,
9
- stemmed** 135:7,10
- step** 23:3 24:10
26:20 27:22 33:13
34:19,20 39:19
40:17 42:15 52:23
67:18 68:9 142:19
- stereotypical**
142:11
- Stern** 91:24 92:2,4,
8,11,14,16 93:16,18,
25 94:4,7,10,13,19,
24 95:5,8,10,14,16,
19,24 96:1,11,17,21
97:6 98:17 99:7
102:24 103:2
- Stern's** 92:22
- Steve** 220:20
- stick** 48:2
- Stonerock** 6:5 8:18,
22,25 9:7 11:16
12:14 13:6,12,23
14:11 17:2 18:21
19:3,10,23 20:7,15
21:10,18 24:20
25:10 26:21 27:5
28:4,25 29:13 30:19
31:15 32:9,21 33:23
34:5,25 35:12 37:18
38:5,19 39:21 40:19
41:22 42:7,20 43:8
44:14 45:2,24 46:13
47:14 48:9,16 49:5,
24 50:10,21 51:11,
18 53:1,14 54:18
55:4,19 57:11,16,21,
24 58:2 62:22 63:19
64:4 65:13,17,19
66:11 67:21 68:13,
21 70:1,10,19 71:4
75:4,15 76:5,15

- 77:2,17 78:6 79:3,
14,22 80:11 82:14,
23 88:23 89:9,18
90:4 91:10,14 92:25
97:19 98:22 101:22
102:9,17,22 103:9,
21,25 104:2,5 105:5,
14,25 106:11,20,25
107:8,20 108:18
109:1,20 110:13
111:3 112:8 115:3,
10,18,23 117:7
119:17 121:14
122:7,25 123:14
124:4 125:14,23
126:19 128:11,25
131:12,22 132:5,19
133:22 134:4,18
135:15 137:7,15,19
138:12 139:5
144:11,23 145:11,21
146:3 151:16 152:6,
18 155:2,7,17 156:5,
17 157:20 158:11
159:17 160:11,15,19
161:2,7,21 165:4
166:7 167:9,21
168:10,24 169:10
172:19 173:2,16
174:5,7,10,16 175:1,
7,14 176:2,21
177:17,24 178:2,7,
16 179:2,4,6,10,18
180:4,17 181:2,22
182:7,21 183:7,15,
21 184:4 185:6,22
186:5,22 187:14
188:6,8,14,24 189:5,
17 190:10 191:2,10
192:8,17,20 193:5,
11,18 194:22
195:13,17 196:9
197:4,11 198:11
199:10 200:5 201:6
202:10,17 203:8
204:2 205:1,23
206:17,25 207:10,18
208:2,16,24 209:5,
18 210:6,15,25
211:13 212:1,11,21
213:6 214:6,18,25
215:5,12,22 216:10
217:2,13 219:5,20
220:5,12,23 221:8,
14,23 222:5,17
223:7,20 224:7,23
225:24 226:12
227:8,12,15,18,25
228:10,13,24 229:2
- Stonerock's** 203:4
- stop** 100:21,22
103:3 121:1 137:13,
16 217:10 218:12
- Stormy** 194:15,20
195:10,22,24 204:24
205:19
- story** 149:22,23,24,
25
- straight** 135:5
- strategy** 79:1
- strike** 103:3 160:1
172:10 193:15
206:14 218:12
223:14,16 227:3
- string** 30:2
- strip** 94:20
- strive** 141:2
- strong** 91:5
- strongly** 164:5
- struck** 207:9,11
- struggling** 141:20
- stuck** 51:4
- studied** 88:1
- studying** 93:24
- stuff** 11:11 30:12
32:1 148:19 177:13
205:12 226:9
- stung** 140:15
- subcontractor**
25:14,17 34:1
181:13
- subcontractors**
15:22 54:8
- subject** 167:15
187:13 207:8 213:5
214:3,16 215:10
219:18
- submitting** 213:12
- substitute** 103:1
- subtitles** 47:8
- succeed** 113:13
- success** 166:23
- successful** 68:20,
22 75:3,6,10
- sudden** 83:23
- sued** 90:14 185:3
217:11
- suffered** 137:10
200:4
- suffers** 136:18
- suing** 217:8
- summarize** 194:14
- summarizing** 198:5
- summary** 187:23
- Summit** 163:5
- sums** 139:11
- sunset** 13:18
- supplant** 118:18
- support** 12:2 53:12
61:11 75:3 76:3,8
78:20 81:13 113:7,
17 118:21 130:7
131:19 132:10,16
197:2
- supported** 43:4
- supporter** 149:16
166:14,15
- supporters** 74:12
- supporting** 148:3
- supposed** 129:25
- supremacist** 132:3,
10,16,18
- supremacists**
129:16,21,24
- supremacy** 129:20
131:9
- surface** 177:16
- surfaced** 92:8
- surprised** 63:24
- surrogate** 159:9
- surrounding** 61:15
- survival** 158:2,5
- survive** 142:10
154:22 155:14
157:13 158:8
- suspect** 157:16
- suspend** 119:4
- swear** 6:3
- sweet** 140:9
- sworn** 6:8 7:8
- symbol** 60:20
- sympathizers**
118:15
- system** 141:8
-
- T**
-
- tab** 153:12
- tacs** 85:4
- tailor** 77:24
- takes** 203:18
- taking** 59:21 137:19
203:4
- talk** 37:9 106:23
137:16 146:19
149:17 151:15,19
170:11 171:1,3
227:17
- talked** 123:7 126:11
- talking** 11:19 30:8
43:2 88:8 93:22
109:8,11 124:23,25
129:20 130:1,10,20
134:25 135:8 136:16
145:9 154:25 157:10
162:17 195:11
200:20
- talks** 119:15 194:15
- tape** 82:11 105:13
218:15
- tapes** 105:13
- target** 79:20
- targeted** 26:5,6
34:16 67:11
- targeting** 67:5
- taste** 143:9
- taught** 140:4
- tax** 142:4 163:6,12,
14,18
- Taylor** 217:25 218:2
- teach** 24:6 147:5
- teacher** 147:5,8
- teaching** 140:16
- team** 146:11 151:14
- Teeny-tiny** 165:18
- television** 40:24
72:17
- telling** 171:10,11
- temporarily** 119:4
- tend** 96:7
- tendencies** 166:6
- tenure** 151:22
- term** 19:25 34:5
68:22 93:3 125:8
196:14 226:13
- termination** 154:23
155:14 157:14 158:9
- terms** 69:13 102:8
104:22 105:23 106:9
108:24 163:8 186:20
- terrible** 100:24,25
101:2 139:3,4
- Terrific** 86:3,5
- terrorism** 119:6
- terrorist** 118:15
- test** 7:5 118:7,8
- testified** 6:9
- testify** 89:20 175:20
185:9 186:25 187:16
196:13 199:19
211:18 216:3
- testimony** 53:15
55:5 66:13 67:22
76:12 78:7 79:4,23
126:20 128:12 139:6
144:24 161:3 181:3
189:18 190:14
191:12 192:9 193:2,
21 194:23 196:11
199:11 200:6 201:8
202:11 204:3 209:7,
19 210:17 211:2
213:6 220:25 221:16
222:19 223:9 224:24
225:25
- Text** 113:19
- thankful** 39:15
- thankfulness** 23:4
- theory** 187:3

- thing** 7:12,15 11:6
36:21 94:19 96:4
114:10 123:8 140:9
226:17,18
- things** 30:8 69:17
90:24 91:6 92:12
97:12 98:21,23
101:3,14,18 139:1,4
140:8 141:3,4 142:6
143:3 145:7 148:23
179:1 188:8
- thinks** 36:7
- thought** 130:14
143:5 149:3,5
180:15 194:9
- thousands** 136:4
198:7
- threats** 118:8
- thrilled** 60:12
- thriving** 143:16,24
- thumbs** 74:1 84:14,
16,17,20
- tic** 85:4
- tideless** 163:7
- tied** 213:20
- ties** 177:9
- Tillerson** 221:5
- time** 8:18 19:9 22:9
32:22 33:14 40:8
44:7 45:15 46:18
47:2,12 49:11,14,16,
17,20,22 50:5 56:4
64:21 66:16 93:8
94:12 104:3 108:19
109:1,5,7 110:13,19
113:13,18 118:1,7
119:18 122:11,25
124:5 125:15 133:23
134:20 135:17 145:9
147:21 150:16,20
151:2,16 154:4
156:6 160:16 161:1,
7,14,15,17 167:23
168:18 169:2,25
173:9 187:5 188:21
189:13,14 190:1
196:4 200:19 201:11
203:21 204:19 209:8
211:1 217:14 220:23
223:20 227:13
228:15
- timeline** 14:8
- times** 27:25 93:9
136:18,20 191:16
203:18
- timetable** 16:25
- today** 8:24 13:2
59:20 60:11 80:22,
24 87:12 93:10
112:22 118:8 137:18
144:16 146:12
147:11 211:21
- today's** 92:23
- togetherness**
23:11
- told** 157:25 162:4
180:15 181:24
- tolerant** 118:25
- tomorrow** 163:23
- Tony** 56:2,5,9 64:15,
19,22 65:1
- top** 40:24 89:21,24
221:20 224:18
- topic** 29:6 124:11
- totally** 13:6 83:25
130:17 228:6
- Towers** 136:6
- town** 139:22 169:14
- track** 185:4 216:16
- trade** 142:5
- trading** 116:15
121:25
- trail** 136:3
- training** 15:3
- transcript** 228:4
- transform** 60:9
- transparent** 30:7
- trash** 69:5
- treason** 129:13
- treasurer** 10:21
- Treasury** 220:20
- treated** 218:4
- treatment** 27:3
28:21,23 29:10
- 132:13,18 133:5
134:12,17 135:16
136:1,9,21 143:17
146:1,11,14 147:13,
15,18 148:2,5,6,8,
13,15,20,21,23
149:9,12 150:1,4,22
151:4,19 152:15
153:21 156:2,10,16,
21 157:3,7,10
158:22 162:8,16,23,
24 163:6,19,24
164:10,16 165:12
166:4,15,16,20,21,
25 167:16,20 168:4,
5,9,20 169:16,17,18
170:16 171:18
172:1,18,24 173:13
176:12,14 177:7
178:24 180:8,24
181:12,20 182:20
184:3 190:1,20
193:14 194:7
195:11,23 200:1,2,
11,22,25 201:1
204:24 205:19,20
206:15,16 207:17
208:1 209:3,12
212:17,20 215:3
216:9 217:11 218:3,
12,15,21 220:21
221:6,21 222:25
223:16,18 224:20
225:19 226:11**
- trend** 42:4
- true** 18:9 37:14,16
41:20,23 92:17
109:14,15 120:8
205:18
- Trump** 6:22 9:12
10:17 12:11 13:3,5,
21 14:9 16:6,11,14,
17 17:9 18:12,19
19:2,15 22:22 23:1,
7,8,13,25 24:10,11,
14 28:1 30:6 31:21
32:7,20 33:15 36:10,
24 37:4,13,17 38:2,
14,15 41:3 42:19
43:7 45:10,12,15,16,
17 46:10 47:2,3,4,
10,11,24 48:1,6,15
49:4,12,19,22 50:6,
9,18 51:3,16 52:6,8,
16 53:10,13 55:3
56:13,20 57:9 58:9
59:2,8,13 60:3,5,24
61:7,18,20,23,25
62:3 64:1 65:5 66:1
67:3,14,19 68:11
69:11,24 70:18 71:2,
13,25 72:10,15,18
73:4 74:5,11,13,15
76:3 80:10,19,22,23
81:13,14 82:4 83:8,
12,15,17 84:3,6,8,
15,21,24 85:2,11,15,
17,21 86:1,2,3,5,12,
14 87:1,4,6,9,20,23
88:1,5,7,10,13 89:17
90:16 92:1,3,5,9
93:14,17,20 94:1,11,
17,22 95:1,3,7,9,12,
15,18 96:3,7,12,14,
19,22 97:4,8 98:20,
25 99:12,17,22
100:2,5,7,10,16,24
101:2,4,7,15,18
102:7,8,13 103:8,13
104:12,14 107:12
108:16,24 109:13,18
110:1,6,10 111:1,9,
10,22,25 112:3,6,23
113:1,7,12,16,17
114:1,18 116:10
117:21,22 118:4
119:14 120:3,7
121:12 122:1,22
123:23 124:3 125:8,
12 126:13,17 128:8,
9,21,23 129:17
130:8,16,23 131:7
- Trump's** 27:3 37:14
41:20 42:15 43:3
44:12 45:1 56:6
63:17 64:23 77:15
90:3 107:17 110:25
111:13 112:24
128:20 139:2 141:9
150:23,24 163:20
168:23 191:9,11
200:21 215:10
222:10
- truth** 7:8,10 46:7
- Tuesday** 176:13
- turn** 28:22 178:9
200:14
- turned** 113:1
- turning** 149:1
- turns** 7:24 176:20
- TV** 94:15
- tweet** 216:19 218:2
- twin** 136:5 146:18
- twins** 147:3
- Twitter** 40:25 114:9
216:25
- two-sided** 36:13
- type** 50:25 95:11
126:4 134:23 151:9
166:24 169:3 194:9
195:3
- typing** 7:14
-
- U**
-
- U.S.** 116:14 120:3
- Uh-huh** 44:22 99:19
109:10
- Ukraine** 176:17
- ultimate** 76:2
176:12,14
- ultimately** 141:24
143:4
- UN** 163:4
- unapologetically**
140:6
- unaware** 63:22
126:3 146:6 221:2
- unborn** 41:16
- underlying** 7:16
- underserved** 69:13
- understand** 7:18
11:13,15,21 13:17
14:4 20:1,9 26:9
29:2,16 35:2 36:14
40:21 42:10,14,22
48:22 53:3,17 54:16
64:6 71:6 75:7 79:6,
17 82:17 90:6,24
93:4 102:1 119:19,
21 121:17 123:1
125:16 126:14
129:18 132:21
135:19 175:19
176:24 177:1,17
180:1 181:5,9 182:4
194:11,25 195:25
196:1,5,16,18
198:21 201:9 204:4
206:5,22 209:15
213:9 226:3,16
228:15

understanding 7:15 29:5 39:20,24 46:1,16 47:16 48:20 49:9 50:13 155:15 159:20 186:2,10,17, 20,21,23 187:1,9,11, 16,25 197:21 199:17 206:4 207:3 209:10, 23 211:5,16 215:14 225:1 226:1	unsure 31:19 32:17 68:25 106:15 114:1 157:5 220:17	video 21:1,7,19,22 22:13,21 23:16 24:2, 4,15 29:24 30:13 31:3,23 32:2 33:7,17 39:7,17 41:18 45:8, 19 46:23 47:6 51:25 52:10 56:1,15 57:22, 23 59:1 62:10 63:1 64:18 65:7 69:10,18 71:2,12,15 73:3,7, 19,20,21 74:9,18 80:17 81:1,11,19 82:9 83:5 88:14 91:21,23 92:7,18 93:1,13 97:13 98:5 99:10 101:9 103:20, 22 104:9,10,18 107:25 112:15,19 113:20 116:9,23 117:25 118:3 119:8 120:2 121:2 123:15 124:12,13 125:2 129:7 131:2,14 133:4,13 135:15,25 136:23 137:8 139:14,15 143:25 144:4,6,8 146:10 150:7 158:22 162:21,22 164:19 166:13 167:2 169:15 171:13,22 173:3,5 178:10	56:5 64:22 92:7	ways 163:21
understands 142:2,8	untrue 109:14	Voices 45:10,15,17 47:2,4 74:11,15 75:22 80:19,22	Volatile 119:5	weather 133:8
understood 43:1 226:22	uplift 60:8	vote 36:19,20,24 37:3 68:12 75:20,23 76:22 128:8 129:15 146:14 171:19,20 218:3	voted 23:12 74:5 146:13 218:12	week 129:9
unemployment 113:13 163:9	uploading 21:1	voters 26:6 36:4,6 76:9 121:13,16 127:11 144:19 145:10 198:2,3	voters' 138:8 139:10	weekend 148:1
unenforceable 214:5	utmost 7:9	votes 35:19 36:10 173:13	voting 129:12 170:15 171:16,18	weekly 194:16
unequivocally 129:10,14 130:6	utter 30:4	W	W-9 213:22	weeks 138:9
unfair 130:18 137:5 192:21	vagina 96:13	Wade 169:22	wait 30:9 84:11 85:8 124:10	weird 100:21
unfaithful 204:25 205:14,21	vague 8:18 11:17 13:23 19:24 24:20 25:10 32:22 33:23 34:5 40:19,20 41:23 48:9 49:6,24 50:10 54:18 55:19 64:5 65:13 66:11 68:22 75:5 79:4 82:14,23 90:5 93:2 98:22 101:24 102:9 105:5 108:18 109:1,5 110:13 117:8 119:17,18 121:14,15 122:7,25 124:4,5 125:14,15 133:23 134:20 135:16 145:11 161:7 165:4 167:9,22 181:3 192:25 195:17 196:14 201:11 206:1 207:11 209:8 210:25 211:1 217:14 220:23 223:20 224:8 226:12	validity 192:4	waited 39:10	well-known 82:3
unfavorable 137:2, 25 138:5	values 116:20 118:5 140:4	view 8:7 99:8 102:21	waited 39:10	Western 148:24
uniqueness 107:17	vehicle 145:8	views 42:18 43:3,5 172:17	waiting 174:3 208:23	WGDP 116:12 117:13
United 20:4 140:22 145:10 221:12	veracity 180:3 197:23	violated 189:9 199:14	waive 206:24 227:23	whatsoever 43:5
unity 23:10	versus 104:23 122:1 169:22 206:1	violates 188:19 189:9	waived 207:5	white 29:10,11,20 78:23 79:11,12 80:1, 3 129:16,20,24 131:9 132:3,10,16, 18
universities 59:3, 19,23 60:5,14 65:10	vet 56:2 64:19	violating 217:8,12	walk 84:21 94:2 133:7	Whitehouse 60:25 62:21 66:17 151:22 218:5 222:23
University 14:23	vetting 118:9,10 121:11 122:3	virus 149:23	wanted 30:11 32:1 83:19 141:3 147:9, 10,18 148:2 149:14 157:8 194:8	Whoa 83:11 84:3,4, 6,8
UNKNOWN 22:22, 25 23:2,8 24:5 29:25 31:24 33:8 41:9,11, 14 46:24 52:2 59:7 60:2,4,23 61:2,3,4,5, 17,19,22,24 62:1,2, 5,7,8,9 83:16 84:4, 10,13,18,19,23 92:13 120:5 124:16, 22,25 169:16	viable 12:12	visas 119:1	war 118:6 180:1	wife 150:24
unlike 7:20	vice 59:11 150:13	voice 74:16 80:24 81:18 104:16	warranted 168:21	win 81:14 170:23
unlocked 170:9		VOICEOVER 39:10	watch 21:8,10 22:20 26:4	wind 13:11 14:9
unlocking 171:8,9			watched 26:14 75:14 123:16	wind-down 12:20, 24
unprecedented 163:20				winding 13:16 15:12,14 16:23 17:1
unsigned 161:19				wing 142:24

97:11 104:12,13
 105:9,11 106:18
 107:16 108:9,17
 112:25 113:2,4,7,8,
 12,14,15,16 114:1,
 18,20,24 115:1,8,16
 116:21 119:16
 142:13,15,20 150:5
 162:25 163:17,20
 164:12,17 190:21
 193:15

women's 105:19
 108:2,8,13 116:10,
 16 121:22 163:9

womenfortrump20
 113:24 114:8,15

won 145:17

wonderful 59:16
 133:10

wondering 90:18

Woodward 183:18
 184:8

Woody 101:5

word 27:25 91:5
 203:4

words 48:13 63:18,
 25 67:19 78:3
 127:23 181:10 199:4

work 23:14 55:13,14
 139:16 140:5,19
 141:8 155:18 156:18
 157:21 158:12
 159:18 170:12 171:5
 185:7 189:19 190:12
 193:1,19 194:24
 208:3 210:16 211:3,
 14 212:2,22 214:6,7
 215:21,23 217:15
 219:21

worked 66:9,16
 127:14 154:13
 174:24

workers 113:3
 171:1 215:20

workforce 113:5
 163:22

working 59:17
 113:9 116:18 141:23
 147:22 148:12
 161:16 163:13 222:3

workplace 212:19

works 136:17

world 32:20,24
 116:20 119:6 135:13
 142:23 143:20,22
 170:5

worldwide 119:15

worry 96:5 169:21,
 23

worst 143:21

worth 56:9 65:1

woven 59:24

wow 149:9

wrap 219:14 227:7

wrapping 219:1

write 111:1 155:23
 226:19

writing 116:3

writings 185:2

written 24:13 112:5
 136:9

wrong 130:14

wrote 63:17,25
 111:13,17,21,22
 116:2 148:17 184:6
 226:6

Wyndal 106:4

X

xenophobe 122:22,
 23

Y

y'all 174:14 182:1

Yankees 133:9

year 163:14

years 19:6 30:1
 39:10 60:19 93:21
 112:22 136:14
 138:10 148:16
 163:10

yesterday 17:16
 59:6 124:15 169:11,
 13 192:2

Yo 171:6

York 69:16 136:6,18
 163:5 192:1 214:5
 228:2

young 43:2 94:3
 113:2

younger 164:7

youth 24:6

Youtube 172:9

Z

Zoey 148:4,7

zones 56:6 64:23

Zoom 106:4 184:19