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4 SELECT COMMITTEE TO INVESTIGATE THE
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
6 U.S. HOUSE OF REPRESENTATIVES,
7 WASHINGTON, D.C.

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11 INTERVIEW OF: SEAN RAY DOLLMAN

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Wednesday, June 29, 2022

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Washington, D.C.

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The interview in the above matter was held in room 5480, O'Neill Office House

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Building, commencing at 10:19 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8 [REDACTED] INVESTIGATIVE COUNSEL

9 [REDACTED] SENIOR ADMINISTRATIVE ASSISTANT

10 [REDACTED] STAFF ASSOCIATE

11 [REDACTED] FINANCIAL INVESTIGATOR

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13 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

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16 For SEAN RAY DOLLMAN:

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18 UTTAM DHILLON

19 JUSTIN MAY

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[REDACTED] This is the transcribed interview of Sean Dollman conducted by the House Select Committee to Investigate the January 6th Attack on the U.S. Capitol pursuant to House Resolution 503.

At this time, I would ask the witness to please state your full name for the record and spell your last name.

Mr. Dollman. My full name is Sean Ray Dollman. And my last name is spelled D-o-l-l-m-a-n. Ray Dollman.

[REDACTED] Now, this will be a staff-led interview, Mr. Dollman, although members may choose to ask questions. At this time, no members are present.

My name is [REDACTED] I'm investigative counsel with the select committee. And with me from the select committee staff is Senior Investigative Counsel [REDACTED], Financial Investigator [REDACTED] And joined with us remotely is Financial Investigator [REDACTED]

At this time I am going to ask that your counsel identify himself for the record and any colleagues of his.

Mr. Dhillon. Yes. Uttam Dhillon and Justin May representing Mr. Dollman.

[REDACTED] Now, Mr. Dollman, you are voluntarily here for this transcribed interview. Some ground rules for the interview: There is an official reporter transcribing the record of this interview. The reporter's transcription is the official record of the proceeding. This proceeding is also audio and video recorded, and we ask that neither you nor your lawyer audio or video record this proceeding. Please wait until each question is completed before you begin to respond, and we'll do our best to wait until your response is complete before we ask the next question.

The reporter cannot note nonverbal responses, such as shaking or nodding your

1 head, so it's important that you respond to each question with an audible, verbal
2 response. Please give complete answers to the best of your recollection. If a question
3 is unclear, please ask for clarification. If you don't know the answer, please just say so.
4 Also, remind you that it is unlawful to deliberately provide false information to Congress.
5 Doing so could result in criminal penalties.

6 Logistically, please let us know if you need any breaks or would like to discuss
7 anything with your attorneys, and we're happy to accommodate. And before we begin,
8 do you have any questions?

9 Mr. Dollman. No, I don't believe I do.

10 EXAMINATION

11

BY [REDACTED]

12 Q Okay. Mr. Dollman, do you recall that you met with us months back for an
13 informal interview?

14 A Yes, sir.

15 Q Today's interview will be pretty similar to that in that we'll go over many of
16 the same topics. But we ask that you provide fulsome answers and not rely on a
17 presumption of having said something in a prior -- in a prior interview. Is that fair?

18 A Say it again. I didn't catch the end of that; don't rely on --

19 Q I'm just asking that -- we're going to ask you some of the same questions
20 today, but just provide us with the full answers today without reference to your prior and
21 formal or otherwise kind of leaving anything out because you previously told us in your
22 informal interview. Does that make sense?

23 A Yes, understood.

24 Q Okay. Can you please tell us your date of birth?

25

A [REDACTED]

1 Q And where do you reside?

2 A In Peoria, Arizona.

3 Q And what's your cell phone number?

4 A [REDACTED]

5 Q Is that a personal cell phone?

6 A Yes, it is.

7 Q And did you have that same personal cell phone in 2020 through 2021?

8 A No, sir.

9 Q When did you get this current cell phone?

10 A I don't remember when I got it. Could have been this year.

11 Q And to be clear, I meant --

12 A It was last year, sir.

13 Q And I'm asking about the -- sorry. I'm asking about the cell phone number,
14 not the physical device, to be clear.

15 A Yes. Yes, sir.

16 Q All right. So what personal cell phone number did you have from
17 November 2020 through January 2021?

18 A It was [REDACTED]

19 Q And at that time, did you have any other numbers that you used besides that
20 personal phone number?

21 A No, sir.

22 Q Did you have a work phone number?

23 A No, sir.

24 Q Okay. So any phone calls or whatever else you took in your capac -- in a
25 professional capacity you handled on your personal cell phone?

1 A Yes, sir.

2 Q And where is the physical device that you used in that time period, in
3 November 2020 through January '21?

4 A Where is the physical device?

5 Q Yes.

6 A You're talking about my phone?

7 Q Yes, yeah. Where is the cell phone you used in -- at the end of 2020 to
8 early 2021?

9 A Same phone --

10 Q Okay. And do --

11 A -- different number.

12 Q Okay. So you had the same -- you have a different phone number but the
13 same device. Is that correct?

14 A Yes, sir. I got a new phone in 2020, but it was the same -- I got the same
15 since then.

16 Q Okay. And then at some point you switched your phone numbers. Is that
17 correct?

18 A Yes, sir.

19 Q Okay. And why did you switch your phone numbers?

20 A So I've had the same number since my freshman year of high school,
21 and -- so on a personal note, I received a message from an old girlfriend and my wife was
22 not very happy about it, even though I never talked to her, and she asked me to change
23 my number.

24 Q Okay.

25 A So I did.

1 Q All right. What about email addresses? Let's talk about what email
2 addresses you used in late 2020 through early 2021, both personal and professional.

3 A So I have my campaign email. That was SDollman@DonaldTrump.com.
4 And my American Made Media consultant's email was Sean@AMMediaDC.com. And
5 the DataPeer email was a Sean@DataPeer.com. And then my personal email is
6 [REDACTED]. I also have an old Gmail that was [REDACTED]
7 but I don't really use it.

8 Q Now, do you still -- of the email addresses you just noted, are there any of
9 those you no longer have access to?

10 A The SDollman@DonaldTrump.com. And that's it.

11 Q Okay. Now, what about social media accounts? Do you have an
12 Instagram or Twitter account that you used in 2020 and 2021?

13 A No, sir.

14 Q Okay. Let's go through your educational background. Can you tell us a bit
15 about your highest form of education?

16 A So I have two bachelor's degrees, one in finance, one in management, and
17 then a certificate in marketing.

18 Q And when and where did you get your bachelor degrees?

19 A The Northern Arizona University, and it was -- December 2012 is when I
20 graduated.

21 Q Okay. And when did you get your certificate?

22 A That same time, sir.

23 Q Okay. Let's go back and start with your professional background. Can you
24 walk us through your professional background?

25 A So after high school I joined the military, and I was in for 3 years and

1 17 weeks, as a gunner on the M1A1 main battle frame. I got done, but fulfilled that
2 agreement with the Army in 2009. And then I went to school at a community college to
3 get my feet wet again. I mean, a big difference from the Army to the school. So I went
4 to a community college for 2 years, and then I went to Northern Arizona University where
5 I received two degrees and a certificate.

6 After that, it was December of 2012, and no one was really hiring. I applied to
7 multiple places, and it was a little difficult to get a job, so I went back to construction.
8 Been doing construction my whole life in the family. And so I did that for a little while,
9 trying to help with the operational side through a small construction firm -- a construction
10 company.

11 In 2014, my little neighbor asked me if I would help them with campaigning for
12 State treasurer, and I told him I would. But I started as his driver, and then -- so we
13 started helping him with setting up all the speaking events, helping him with his
14 speeches. He ended up winning that election. He gave me a job as -- I think it was
15 government liaison communications in the treasurer's office in the State of Arizona.

16 Q Sir, just to interrupt you, sir, tell us the name of your neighbor you're talking
17 about who you worked for?

18 A Jeff DeWit, sir.

19 Q Okay. All right. And as you go forward, when you talk about individuals, if
20 you just do your best to tell us their names and other kinds of identifying details about
21 them, and I'll try to -- I'll avoid -- try to avoid interrupting you.

22 A Cool. Understood. And then the deputy treasurer at the time, Charleston
23 Wilburn (ph), was leaving the office. I got promoted to deputy treasurer of Arizona.
24 And I believe that was 2015. And then I met part of the Trump campaign in 2016. And
25 in that timeframe, I was hired as deputy director of operations in 2016 for the Trump

1 campaign. And --

2 Q Okay. So --

3 A And then I've been on the Trump campaign since.

4 Q All right. So let's back up one second. So the job is deputy -- you said you
5 were the Arizona treasurer. Now just to understand, the treasurer of -- can you explain
6 exactly what means? Like, when you say Arizona treasurer, for what body, for the State
7 of Arizona, more generally?

8 A Yes, sir. It bears on the State treasurer.

9 Q Okay. And was that -- that was your first job working as a treasurer. Is
10 that fair?

11 A I was the deputy treasurer in Ari -- in the State of Arizona. The first job in
12 the treasurer's office, the State treasurer's office, was the -- I think it was government
13 liaison communications in that office.

14 Q Okay. So when you joined the Trump campaign, can you tell us again what
15 your title was?

16 A It was deputy director of operations.

17 Q And what was involved in that job?

18 A I worked on the budget for the remainder of the campaign and pretty much
19 track in accounts receivable, accounts payable, and review invoices, and working with
20 departments to get their invoices approved. Kind of the comptroller job.

21 Q And who hired you for that job?

22 A I believe it was Mr. DeWit asked me to help with the campaign.

23 Q Okay. So you were deputy director of operation, and you joined the
24 campaign when in 2016?

25 A It was right after the convention. I believe it was July of 2016 was the

1 convention. So it was the end of July, early August sometime, in that timeframe.

2 Q Now, did there come a time where your job changed from deputy director of
3 operations?

4 A Yes, sir. In -- after the election, the -- I stayed on the campaign helping with
5 wind-down and then continuing with the campaign because the campaign did not close.
6 So in February of 2017, I became the director of operations.

7 Q And did your responsibilities change when you became director from deputy
8 director?

9 A So in that timeframe there weren't very many people on the campaign, and
10 so I picked up a couple new duties. But it was just like scheduling the advance people
11 for events, and contracts, reviewing contracts and stuff for venues. Nothing really
12 changed, so just a couple of additional things.

13 Q Okay. All right. And then tell us about the -- let's go to the 2020 cycle.
14 Did there come a time where you had a title change or responsibilities added leading to
15 the 2020 cycle?

16 A So my responsibilities as -- pretty much from the beginning, didn't really
17 change a whole lot during 2016 to 2020. I still was the, like, comptroller. My title did
18 change to CFO. And I don't really remember the time. I think it was February 2020.

19 Q And tell us about what happened that led to your changing of title.

20 A So mostly everybody knew me on the campaign. I was the -- the guy who'd
21 known the invoices and everything. And one day Brad Parscale said that -- he called me
22 CFO, kept calling me the CFO. And that's pretty much how my title changed to CFO. It
23 wasn't -- we didn't throw a party or anything. It was just him singing it, and then it
24 turned in to me being the CFO, everybody called me it.

25 Q And now your responsibilities didn't change from what you had been doing

1 before. Is that fair?

2 A That's correct. I mean, in 2020, we hired additional individuals. So I
3 actually was no longer helping with scheduling advance people or events or anything like
4 that. It just was primarily the comptroller job, overseeing accounts receivable and
5 accounts payable.

6 Q Now, in the 2016 cycle, was there another individual who served as the CFO?

7 A I think at that time -- I think -- I believe Steve Mnuchin was being called the
8 CFO at that time.

9 Q The Steve Mnuchin who became the Treasury Secretary?

10 A Yes.

11 Q Okay. So tell us a bit or just help us understand, if your role and
12 responsibilities remain the same from, it sounds like, from '16 through when you became
13 or you were dubbed the CFO in 2020, but someone else was performing the role of CFO in
14 the 2016 cycle. What was that person doing that's separate from what you were doing
15 as the 2020 CFO?

16 A So I was still doing budgeting and like updated cash reports or like on a
17 dashboard, but I was sending it to Mr. Mnuchin and not through the campaign managers
18 or anybody.

19 Q And that -- you're referencing you were doing that in the 2016 cycle?

20 A Yes, sir.

21 Q So when you would send your -- so, basically, you would do your work and
22 send it to him for review. Is that fair?

23 A Yes, sir.

24 Q And then when you got to the 2020 cycle, with you now being dubbed the
25 CFO, was there someone else you would then send your work forward to review?

1 A It was -- it wasn't a review. I just sent it or updated to the campaign
2 manager at the time. And as you know, it changed during that time, so whoever the
3 campaign manager was was the person I was directly speaking with --

4 Q Okay.

5 A [Inaudible.]

6 Q Okay. So prior to Mr. Parscale's removal as campaign manager, did you
7 report to him from February of 2020 through -- I believe he left July 18th of 2020. Did
8 you report to him during that time period directly?

9 A I believe he was campaign manager prior to February 2020. So he was the
10 one that I reported to, yes.

11 Q Okay. Yeah, I was referring when you said you considered yourself -- or
12 others considered you CFO as the timeframe. And going forward, after Mr. Parscale left
13 and Mr. Stepien took over, did you then report directly to Mr. Stepien for the duration of
14 the campaign that remained?

15 A So Mr. Stepien, they had -- we had a deputy campaign manager, Justin Clark.
16 So I reported to Justin Clark at that point in time. I did speak with Mr. Stepien about the
17 financial situation of the campaign, but I didn't -- it was mainly Justin Clark that I reported
18 to.

19 Q And tell us what role Jared Kushner had in the management of the
20 campaign's finances.

21 A I don't really know what Mr. Kushner's role was as managing the finances.

22 Q Okay. Well, what involvement did you have with Mr. Kushner in your role
23 as CFO in 2020?

24 A I would send him updated reports on the financial status towards -- mainly
25 towards the end of the campaign.

1 Q So explain that, in that you report to the deputy campaign manager. You're
2 sending Mr. Kushner financial information. Why were you doing that, and what did you
3 understand his role to be when it came to the campaign's finances?

4 A Honestly, I don't know what his role was. I did not understand what his
5 role was. But I submit them to Mr. Clark. And at some point, I was involving Mr.
6 Kushner. But I don't know how -- I don't remember how it came about, but I would send
7 him the email where the finances were.

8 Q Do you recall -- did that happen pre-election or post-election?

9 A Pre-election, sir.

10 Q And do you recall, were you directed to do that or -- by Mr. Clark or did Mr.
11 Kushner directly tell you to do that?

12 A I don't recall who it was. But, I mean, I'm sure I would have been told to do
13 it if I would have added up to it. I wouldn't have done it without, but I don't recall who
14 it was.

15 BY [REDACTED]

16 Q Mr. Dollman, when do you remember Mr. Kushner getting involved in the
17 campaign's finances? Like, what's the earliest that you remember him being involved?

18 A He was involved in 2016, obviously. But in 2020, I cannot remember if it
19 was September or October, but I think it was definitely later on in the campaign cycle.

20 Q So is it fair to say that for the 2020 campaign cycle, his involvement
21 waned -- after the 2016 election, his involvement waned and then picked back up in the
22 months before the 2020 election?

23 A To my knowledge, I don't know what his involvement was outside of what I
24 know.

25 Q So you were there in 2019, in 2020, and you were there during the transition

1 between campaign managers from Mr. Parscale to Mr. Stepien. There's been public
2 reporting that one of the reasons that Mr. Kushner got more involved in the finances was
3 because of concerns in the financial management of the campaign.

4 Was it your impression that after Mr. Stepien was put into place -- like, we're
5 trying to figure out Mr. Kushner's role in a timeframe sense, right? So did you get the
6 impression that Mr. Kushner wasn't there until the issues with Parscale arose in 2019, or
7 he really wasn't there until Stepien comes on in 2020? Like, to the extent that you
8 remember in that dynamic, can you help us understand, like, when does he really get
9 involved in the finances?

10 A I don't know if he always has some deal with it. I know Mr. Parscale did
11 speak with Mr. Kushner. I don't know if it was about the finances so much, but I do
12 know he spoke with him. The role of Bill coming in as deputy campaign manager I don't
13 think was the reason that Kushner would have been involved. I think there was some
14 worry on the funds being spent prior to Mr. Stepien coming in, so like underneath Mr.
15 Parscale. And I think there was more involvement once it was -- it was pretty big spend
16 prior to the general, right, for a campaign that had a candidate already. If that makes
17 sense.

18 Q It does, but help a noncampaign person understand the timeline of that in
19 terms of like, when are you talking about, when were the issues, when was the spend?
20 Like, kind of break that down for me, if you will.

21 A So in a primary, when you -- in a normal primary where he's not normally the
22 President, right, you would spend more money in trying to become the nominee for the
23 Republican Party. Mr. Trump was already the nominee, you know, for the Republican
24 Party, so there wasn't a need in that sense to spend that much money in a primary.

25 And, I mean, just outside looking in, that's what I think it was. But that's it. But

1 it just -- I don't know the direction I was going with that one, so it's usually -- he's already
2 been nominated, so you don't need to spend the funds. And I think Mr. Parscale as
3 campaign manager was spending a little too much in a primary.

4 Q And so that would have been 2019, yes?

5 A Into 2020.

6 Q Into 2020.

7 A So yeah. Yeah, because he still has the convention when he is the nominee
8 before the general.

9 Q Got it. Okay. So is it fair to say you have the primary issue, they had
10 concerns about how much Parscale was spending, Mr. Kushner gets very involved in the
11 finances at that point, and then the campaign manager shift happens, Kushner disappears
12 with a little bit -- I don't know if "disappears" is the right word, but you don't see Kushner
13 as much until he's far more prevalent in the months leading up to the election. Is that
14 fair?

15 A Yeah. I wouldn't say disappears -- I would say that there was -- once Bill
16 and Justin became like the campaign -- or Bill became the campaign manager, I think
17 there was a little bit more confidence in his decisionmaking.

18 Q Okay. That makes sense.

19 BY

20 Q Okay. Now, Mr. Dollman, I want to talk generally about the role of
21 approvals for spending prior to the election. So you get an invoice. Someone has
22 spent a million dollars on widgets, and the campaign needs to pay for it. What's the
23 process by which you go about saying, am I going to approve that a million dollars can go
24 to a vendor?

25 A Okay. The -- so if I got an invoice and I had a contract for that invoice that

1 was signed, I would usually compare it to the contract -- the invoice to the contract to
2 make sure that it winds up with the services being provided. It was a higher dollar
3 amount, like you say, like a million dollars, so I would go to Mr. Clark to make sure that it
4 was something that was provided and received, and it was approved to pay.

5 We have -- in a budget, you know, we have our fixed -- fixed expenses, our
6 overhead, things that are already put into the budget that I know are on a monthly basis
7 or whatever. And those things don't usually have to go through the full approval
8 process, assuming that nothing changed within any type of contracts.

9 And then you have your variable spend. And variable spending is just for like
10 GOTV, for get out the vote, for persuasion, for fundraising. And those would be either
11 budgeted and I would know about it, and then I would go to Mr. Clark for approval. Or I
12 would go to individual departments and the department heads to make sure that the
13 services that were being invoiced for were actually provided and they received whatever
14 it was that they needed, and then get approval for that.

15 Q If you went to a department head and they said that's a good spend, would
16 you then go back to Mr. Clark still or would the department have enough for money to be
17 dispensed?

18 A Most of the time, I mean, it really depends on the invoice and like what it
19 was that was being provided. If I could see it and I knew -- we knew that it was
20 budgeted for, then it wouldn't have to go to Mr. Clark. Most high dollar spend or higher
21 dollars spent would be through Mr. Clark to make sure that he was aware within the
22 budget and that the spend was going on.

23 Q Did that all remain -- that process you just described, did that all remain the
24 same post-election?

25 A To be -- the process post-election was a lot. It was pretty similar. It was

1 just really tough to figure out departments and who and where the spend was. I still
2 went to Mr. Clark for any type of spending for the recount spend. Still went to him for
3 wind-down spend, anything that would have happened within the general election. But
4 the -- it was a little bit more confusing post-election.

5 Q Is that because individuals were leaving the campaign, or why was it more
6 confusing post-election?

7 A Yes. Post-election you had, you know, staff leaving. So one of the issues
8 we had post-election was you had wind-down expenses, so expenses that occurred
9 during the general of 2020, the general election. We had one company who did not
10 invoice the campaign the entire time in the primary and the general election, and I was
11 not aware of the spend. And it was for porter jobs and bleachers and other lights and
12 miscellaneous things for events. That company was invoicing -- sending invoices to one
13 of the advance people, and one of those advance personnel already left the campaign.
14 So I never saw those invoices until a couple of weeks after the election. Could've been a
15 month afterwards.

16

BY [REDACTED]

17 Q Do you remember which company that was, just out of curiosity?

18 A I believe it started with an "A." I can't remember if it was like Axiom or
19 something like that. It was a company that provided like rental equipment, right, so like
20 the port-a-johns, bleachers, lights, handwashing machines, stuff like that, for events.

21 Q Gotcha.

22 A So that was a pretty big dollar amount too. That one Justin Clark was very
23 aware of, because it impacted that from a general election.

24 Q Because that would have come out of the campaign account, correct?

25 A That's correct.

1 Q Okay.

2 BY [REDACTED]

3 Q All right. So let's move to November 2020, because we're going to spend
4 most of our time today talking about the post-election time period. In the lead-up to
5 the election, did you have any discussions with anyone on the campaign about
6 expectations regarding post-election fundraising?

7 A I don't recall expectations of post-election fundraising. I do know that I
8 spoke with, I believe it was Justin Clark about raising toward debt for the general election.

9 Q And when did those conversations regarding fundraising for debt begin?

10 A I don't recall, sir.

11 Q Give me a general framework. Is this a week out from election day or are
12 you talking days out from election day or further out than a week?

13 A I'd say a week. Closer to a week.

14 Q Okay. And --

15 A Not within days of the election, no. It was a week or so.

16 Q And tell us what the substantive conversations were.

17 A So our Presidential campaign, from my experience and from what I had seen,
18 usually goes into debt from the general election. And it was an understanding that we
19 would continue to raise towards the debt from the general election.

20 BY [REDACTED]

21 Q Where did that understanding come from?

22 A Looking at previous FEC reports and speaking with other individuals --

23 Q Which in- --

24 A -- that told me that.

25 Q Which individuals?

1 A My -- I don't recall who. I spoke with multiple people about it.

2 Q What we're trying to figure out is, is where did the understanding come from
3 that you have that you're going to keep fundraising towards debt?

4 A Understanding that we would be in debt from the general election, because
5 the campaign would normally go into debt during the general election.

6 Q And were there conversations -- excuse me. Were there conversations
7 around those concerns and discussions about fundraising to reduce the debt?

8 A It was more of, are we going to raise towards debt that was there from the
9 general election. So it wasn't like how we're going to raise it or anything; it was just are
10 we going to continue to fundraise towards debt from the general election.

11 Q Yeah. And that's the conversation we were just asking about. You said
12 you had that about a week after the election with Justin Clark.

13 [REDACTED] Before.

14 Mr. Dollman. Prior to the election.

15 [REDACTED] Apologies. The week prior to with Justin Clark. So that's the
16 conversation that we were asking you about. And do you remember the contents of the
17 conversation or the gist of what you talked about?

18 Mr. Dollman. No. It was just, are we going to continue to fundraise for debt
19 from the general election, because I was forecasting we were going to be in debt from the
20 general election.

21 [REDACTED] So did you just straight up ask him that, are we going to continue
22 fundraising towards debt a week before the election, and he just said, what, yes?

23 Mr. Dollman. Yes. It wasn't like a full-blown conversation. It's pretty straight
24 and to the point, I guess.

25 [REDACTED] Did you have any other conversations regarding

1 fundraising post-election prior to the election, besides that conversation?

2 Mr. Dollman. I do not recall any other conversations.

3 BY [REDACTED]

4 Q And so was it your understanding from that conversation with Mr. Clark that
5 when you said are we going to continue raising towards debt, that fundraising would
6 continue as it had been going as if -- through the election as if it didn't happen?

7 A I don't know how it would've continued. I don't know the plan or anything
8 on how they were going to continue to fundraise. But you still have an email list, then
9 you can still contact individuals for fundraising. But I don't think there was a structured
10 plan.

11 Q Did something give you that impression?

12 A What's that, ma'am?

13 Q You said you didn't think there was a structured plan to fundraise after the
14 election. Did something give you that impression or were you assuming that?

15 A That there wasn't a structured plan? I think it was just going to continue
16 with like emails and texts.

17 Q Okay. So were you just assuming that things would keep going the way
18 they were or did something give you the impression, either way, that there would or
19 would not be a structured plan to fundraise after the election?

20 A I didn't go into detail with Mr. Clark or anybody about post-election
21 fundraising.

22 Voice. I had this room reserved.

23 [REDACTED] Just a second.

24 Voice. Okay. I'm sorry.

25 [REDACTED] Sorry about that. That is today today, sir.

1 Mr. Dollman. We are muted, so -- oh, you're still muted.

2 [Discussion off the record.]

3

BY [REDACTED]

4

Q All right. Mr. Dollman, let's go to election day. Now, we've -- as I think we've discussed in our last interview, some of the TMAGAC, the joint fundraising committee with the RNC, had some of the best fundraising days after the election in that time period in the days that preceded the election. And I think as has been widely reported, there was a lot of successful fundraising done by TMAGAC in the weeks and months after the election.

10

Does that all sound accurate, what I just said?

11

A The joint fundraising committee? Yeah, I'd say so.

12

Q Okay. Now, what involvement did you have in negotiating the splits between whether it be a Trump committee and whether Save America or the campaign and the RNC?

15

A I didn't really have any involvement with the negotiation of splits. The -- I might've suggested it before, but I was part of the campaign and I suggested changing the splits pretty often.

18

Q And what would spur you on to suggest changing the split?

19

A So, again, I don't remember who I had spoke to about it, but earlier on in the campaign, and even 2016, I was told that a normal JFC with the RNC on low-dollar fundraising would be heavier. It would be more weighted towards their campaign and less towards the RNC. So any time -- you know, I always thought that the campaign would be the higher percentage than the RNC, because you still have Trump Victory as the JFC, right, between the campaign and RNC, and that would have been high dollar, and the majority of the funds raised in that would be towards the RNC. So I always felt like

1 the campaign's small-dollar joint fundraising committee with the RNC TMAGA should
2 have been heavier weighted in the campaigns there.

3 [REDACTED] Initially, it sounded like you said somebody told you that?

4 Mr. Dollman. So -- and this -- I don't remember who it was, but probably told
5 that Romney, when he was running, his lower-dollar fundraising JFC was more weighted
6 in the campaign's favor or in Mr. Romney's favor, and that we should have a higher
7 weight in ours.

8 [REDACTED] Okay.

9

BY [REDACTED]

10 Q So I'm going to show you what's been marked as exhibit 1, which is an email
11 from the day after election day that you send to Jared Kushner, and it appears Gary Coby,
12 Bill Stepien, and Justin Clark.

13 Now, Gary Coby was the digital director of the campaign. Is that correct?

14 A Yes.

15 Q And he was effectively the head of the Trump campaign's digital fundraising
16 apparatus. Is that right?

17 A Yes, sir.

18 Q Okay. All right. The email's going to pop up here one second. But as it's
19 coming up, you'll see at the bottom of page 1 --

20 Mr. Dhillon. If you give us the document number, we may be able to pull it up.

21 [REDACTED] Mr. Dhillon, some of these documents are documents that
22 Mr. Dollman might've produced, but they may have been produced by someone else with
23 a different version. So we'll have to -- to the extent that we're using a document with
24 his -- with numbers he provided, we'll provide those, otherwise tell us when you can see a
25 document on your end.

1 Mr. Dollman. Yes, I see.

2

BY [REDACTED]

3 Q All right. And if we could scroll down, please. Here you see, you sent an
4 email November 4th, at the bottom of the first page. You say, Hey, team -- which, as I
5 said, is Coby, Kushner, Stepien, and Clark -- you say, Based on today's fundraising
6 numbers, we should surpass the amount to make us whole with the RNC at some point
7 tomorrow morning. We will need to agree to percentage split for the JFA moving
8 forward. Below is proposed language.

9 And then you provide language on -- on that split. Do you recall sending emails,
10 not -- well, first of all, do you recall sending this specific email?

11 A Yes, I do.

12 Q Okay. Tell us a bit about what's going on here and what you were trying to
13 convey.

14 A So at post-election -- and I believe you guys know this already, but the JFC
15 split was, I think -- I believe it was 95 percent towards the RNC and then 5 percent to the
16 campaign. So I was told that we were going to hit a number to make good with the RNC.
17 And I don't really recall what that number was, but at that point in time, the RNC was
18 heavier weighted in TMAGA. So I wrote an email, and I was told to let them know when
19 we hit this number and then send this email.

20 Q Who told you what you just said, to send this email?

21 A I believe Mr. Clark was sitting behind me when I sent this.

22 Q And did he dictate to you what to write in the email?

23 A That it -- this is just the standard language that was in the email. It
24 was -- and by that I mean the proposed language below. It's just standard TMAGA
25 language. It's like that we surpassed the number in the amount, or we will by tomorrow

1 morning.

2 Q Now, when you say we should surpass the amount to make us whole, just
3 provide us with some background here. Was there an understanding that there was a
4 certain amount of money that the RNC was owed that, once it had fundraised enough,
5 that that meant that the campaign should now be taking the majority of the money back?
6 Because that's what it appears to be saying.

7 A That the campaign would -- say again. Because I think -- I'll answer what I
8 think you're asking to the extent that I can.

9 There was a dollar amount that -- being raised in TMAGA. At some point when
10 we hit that dollar amount, it would make the RNC whole. I do not know what that dollar
11 amount was for. I don't know what making whole was for. I was just told that that
12 dollar amount, it would make the RNC whole.

13 Q Okay. So when you wrote this email, did you understand what you were
14 saying then, the broader context, or were you just writing down -- were you just
15 reflecting Mr. Clark's thoughts?

16 A I was -- the dollar amount to make whole, but I do not know what, like, the
17 "make whole" was for.

18

BY 

19 Q Yeah. So is it fair to say that --

20 A I was just told the dollar amount.

21 Q Yeah. So the negotiations or the agreement that led up to what amount
22 constituted being made whole, you didn't know about that. But somebody told you
23 when we hit X dollar amount, they've been made whole and we can change the JFA?

24 A That's correct. I was not involved in the make whole number or what it
25 was for.

1 Q Okay. And then, do you see in the email above -- if we could scroll down
2 just a little bit. It says, Can we huddle on this tomorrow? We also need to balance our
3 books.

4 And this is Mr. Kushner writing: Can we huddle on this tomorrow. We also
5 need to balance our books, and then make sure we have dealt with the \$11 million
6 overage.

7 Do you remember -- or what was your understanding of what \$11 million overage
8 he was referring to?

9 A Yeah. It's right there where it says, Sean, can Jason give you an update?

10 So the \$11 million overage -- so when people contribute to a campaign, there's
11 campaign contribution limits. At this point in time, we had \$11 million that we had to
12 send back to donors because they went over their contribution limit.

13 [REDACTED] And, basically, so if someone could have maxed out
14 \$2,800, they did more than that, so under the law, you had to reach back out to them to
15 either take the money back or repurpose it. Is that right?

16 Mr. Dollman. Or you can reallocate it, right. So if they are -- so you have to
17 reach out to them and get their permission. But if they were married and their
18 spouse -- and reallocate it to their spouse and get their approval and their permission to
19 do it. Also, at this point in time, I don't believe the recount fund was set up yet, and -- I
20 don't believe so. But, otherwise, if the recount fund was set up, you would be able to
21 reach out to them and see if they wanted to reallocate it towards recount.

22

BY [REDACTED]

23 Q Mr. Dollman, this email was sent on November 4th, which I'm losing track of
24 time, but I think, was that the day after the election?

25 A Yes.

1 Q Are you saying that the day after the election, the campaign didn't have a
2 legal recount account set up?

3 A I don't remember when the recount account was set up.

4 Q Sitting here today, can you remember it -- whether it was set up before the
5 election or after the election?

6 A It was after the election.

7 Q Any idea how long after the election? Are we talking a day or two, weeks?

8 A Can you scroll down again real quick to the proposed language?

9 So it wasn't set up there in this time. So it would be exceed the limit to the 2020
10 general election account for depositing the DJTFP's recount account.

11 Q Okay. And who would've done that?

12 A [Inaudible.]

13 Q I'm sorry, I didn't mean to cut you off. Can you repeat what you said?

14 A Shoot, I don't really remember what I just said. Sorry about that. If you
15 want to ask the --

16 Q No, that's okay. I totally understand.

17 I guess what I was asking is, who would have set up the recount account?

18 A The treasury -- the treasurer's office or the treasurer of the campaign.

19 Q And who was that?

20 A Bradley Crate.

21 Q So Red Curve would've set that up for them?

22 A Yes, ma'am.

23 Q Okay. And then would Red Curve have told you it was set up so you
24 would've known there was a recount account to include that language in the proposed
25 disclaimer?

1 A Yes. If it was set up, yes, ma'am.

2 Q Okay. And, presumably, would you have included that language, DJT -- I
3 think it's supposed to be FP -- DJT's FP's recount account, would you have included that if
4 Red Curve hadn't already set it up?

5 A No. And, generally, I have a lot of typos in this. But, no, it wouldn't have
6 been included if it wasn't set up.

7 Q Okay. Okay. That's makes sense.

8 And if we could scroll back up.

9 For the \$11 million overage, understanding that a moment ago you said that you
10 would need to reach out to people and get their consent to reallocate it, do you know
11 who was handling that process at the time for the \$11 million in overage?

12 A I believe we had individuals within like the charging compliance team at Red
13 Curve. And then we also had Gary Coby, I believe, was sending out the emails to
14 individuals that were over limit. And then we also had the -- they were called the Trump
15 Victory finance team, or it was like Felicia -- I forgot Felicia's last name -- and Caroline
16 Wren were involved with reaching out to their team. And the people below them were
17 involved with reaching out to individual donors to reallocate.

18 Q And was that regardless of the amount of the donation, even small-dollar
19 donors they were working with on Trump Victory for overage purposes?

20 A They were just called the Trump Victory team because they were working
21 with Trump Victory, the JFC, and for high dollar. But I believe they were also working
22 with our lower-dollar donors as well.

23 Q Okay.

24 [REDACTED] Yeah, go ahead.

25 [REDACTED] All right. So, Mr. Dollman, you see at the top of this

1 page, Mr. Coby says in the last sentence, Today has been our highest, quote, "regular
2 raised," unquote, day ever online, close to the highest day ever online, all orgs combined.

3 So in this post-election period, the Trump campaign was very successful with
4 fundraising. And I want to talk a bit about the response the campaign and you had in
5 the first week after the election to this fundraising.

6 So you start -- the money's coming in. Tell us a bit about the internal campaign
7 discussions about the success of the fundraising.

8 Mr. Dollman. So at this point in time, it was like I said before, post-election was a
9 little bit more confusing because there's a lot of moving parts and I don't think there was
10 as much of a structure on the campaign. You know, normally after an election, there's a
11 clear winner and you can start doing wind-down. At that time, I don't believe the
12 election was called.

13 So there was -- I wasn't involved with a lot of the post-election fundraising
14 communications. I was worried about paying off general election debt and making sure
15 that the invoices we had were being paid. Leading up to the election, we were receiving
16 200, 300 invoices a day and trying to go through those. And then, yeah, the election
17 night, and then, surprisingly, a lot of different individuals or vendors don't submit their
18 invoices for some reason, even if you ask them to send it before the election, they send it
19 post-election. So I spent a lot of my time working with invoices from the 2020, general
20 2020. But I wasn't involved with a lot of the conversations about how fundraising was
21 going post-election.

22 [REDACTED] Well, help us understand that a little bit more, Mr.
23 Dollman. Because with the understanding that a campaign may go into debt
24 post-election, our understanding that it is not normal for a campaign to the week after
25 election is done to have some of its best days ever of fundraising. Because in a typical

1 year, there is no -- typically in election night, we have a winner, and there is not an
2 expectation that for a week -- and in this case, for weeks, months on end, there would be
3 high-dollar -- a high amount of fundraising. Is that fair to say that that's not the typical
4 expectation?

5 Mr. Dollman. Yeah, that is fair to say in an election where there's a clear winner.
6 And whether you win or lose, it is definitely harder to raise towards debt. But right after
7 the election being higher dollar, you know, higher amount raised, it's probably due
8 to -- like, there's a lot more, not involvement, but awareness of a campaign.

9 So normally right before an election, you see an increase in donations. So
10 because everybody -- it's all of the current events, everything -- I mean, 2020 was a pretty
11 crazy year in general, but it was definitely on people's minds, and it was all over the news.
12 So when you get closer to an election, they call it a hockey stick effect. I don't know.
13 But it definitely increases. So every day, I mean, we were receiving more and more
14 donations leading up to election day because of people's involvement or the awareness
15 of the election.

16 I think post-election, the day after, I mean, everybody knew that the election
17 wasn't called, and so there was a lot more involvement on individuals donating, you
18 know. There was a lot more awareness. It was a big event that happened on one day
19 versus a full 2 years leading up to election or fundraising. You know what I'm saying?

20 So the week before the election, they said increases, increases, increases. So
21 you're pretty stagnant throughout 2 years. And then the week before, it increases.
22 That's why they say the hockey stick effect. But it's because of awareness. And then I
23 think the day after the election, everybody -- it's on everybody's mind, it's on TV all the
24 time, and people donated. But like you said, it's not normal in an election where there's
25 a clear winner.

1

BY [REDACTED]

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Q Well, I want to pick that apart a little bit because, to your point, the hockey stick effect leading up to an election -- and you tell me if you disagree because you certainly participated in more elections than I have -- but as a voter, the hockey stick before elections is usually because you think your money is going to something that will impact the result of that election. Right? You're donating for last-minute things. You're -- you know, we've got a midnight fundraiser. You know, you think that you're donating money to impact the result of the election.

Usually, after an election, to your point, if you're fundraising to raise debt, it's a difficult message to say, hey, win or lose, help us pay down our debt. Most people really don't care. But if you're pumping out tons of messages in the week after the election saying, hey, this isn't over, your donation can actually help us continue the fight, and you send the message saying, your money can still impact the results of the 2020 election, that hockey stick keeps going, right?

1

2 [11:17 a.m.]

3 Mr. Dollman. I mean, eventually it fell back down, right? So the couple days
4 right after the election that individuals donated were higher, but it would, like, trickle
5 down to the backwards hockey stick effect, I guess, you know? It wouldn't stay high the
6 entire time.

7

BY [REDACTED]

8 Q When the hockey stick keeps going for days after the election, and you're
9 coming up now on November 6th, 7th, and even the 8th, and the money coming in is
10 surprisingly high, and it's after -- wasn't the election called on November 7th? -- so you're
11 still raising tons of money the day on and after the election is called, do you remember
12 having any internal conversations about, "Gosh, this hockey stick effect is still going for an
13 election that's over; where should we put this money?"

14 A So, in that timeframe, you had the recount account, and there was the
15 litigation within States. And I'm more on the books and numbers side, so I don't really
16 know so much on the legal and political side, where they were going into States and
17 challenging the election results, I guess. So there's a lot of money that needed to be
18 spent towards the recount efforts as well.

19 Q So was it your understanding --

20 A So it's not --

21 Q Oh, go ahead. I didn't mean to cut you off.

22 A So it's not just this, like, "Where do we put all this money?" It's been
23 allocated to recount.

24 Q Right. But you can only -- if you put money in the recount account, my
25 understanding is, once it's in there, you can only use it for recounts. So it's a --

1 A Re- --

2 Q Go ahead.

3 A Recount-related expenses.

4 Q Right, which, understandably, we've seen some things that suggest you can
5 stretch a little bit what qualifies as a recount-related expense, but it has to, tangentially at
6 least, be a recount-related expense. If you can't stretch it into that bucket, that money
7 can't be used.

8 So would you say it's a fine, for lack of a better word, dance of trying to put as
9 much money as you would need in the recount/legal bucket that would be spent on
10 recount/legal? Because, otherwise, it would be sitting in that account, unable to be
11 used for recount/legal, correct?

12 A Yes, that's correct. But the unknown of what you're going to have to pay
13 for it in recount makes it to where it's tough to get a total dollar amount for a budget on
14 recount. Because, at this point in time, I don't know the RNC's relationship with
15 campaign legal, and we didn't know what the RNC was going to pay for and what the
16 campaign was going to pay for as it relates to recount.

17 Q Okay. And I think we're going to touch on some of those things, so I'll turn
18 it back over to my colleague.

19 BY

20 Q Now, you mentioned the recount account, Mr. Dollman. What was your
21 understanding of what the recount account was? Was that a separate bank account?
22 Or how was that set up?

23 A Yes, it is a separate bank account, separate from general election or primary
24 election.

25 So, in the accounts, it should say, like, "P" -- "P" was primary, right? -- so "P 2016,"

1 "G 2016," general 2016. Then you had "P 2020" and then "G 2020." So that's the
2 separation of primary and general dollars. And, that way, on the compliance side, you
3 would be able to allocate funds that were within each bucket compared to whatever
4 election you were in.

5 With recount, it was the same thing. It was a separate account, where funds that
6 were raised into that account would only be spent on recount expenses.

7 Q Now, as part of your job as CFO, you have to have some understanding of
8 the legal requirements under the FEC. Is that right?

9 A I have a broad legal requirement. I usually rely on -- or, I did rely on
10 counsel --

11 Q Okay.

12 A -- for spend or FEC-related legal issues, I guess. I don't know how to say
13 that better.

14 Q Yeah. Now, I don't want to go into any specific advice counsel gave you on
15 specific issues, but was it your general understanding that, as far as funds that the
16 campaign -- that, if the campaign raised money -- the campaign itself, the general election
17 fund -- raised money post-location, that that had to go to debt retirement? Is that
18 accurate? As opposed to other expenditures? Or past invoices, which would be the
19 same thing, technically, I guess, as debt.

20 A Uh-huh. If funds were raised towards debt for the general in 2020, it would
21 have to be allocated towards the general in 2020 --

22 Q Okay. And --

23 A -- is my understanding.

24 Q And was it also your understanding that funds raised for the purposes -- for
25 going to the recount account had to be used on recount-related expenses?

1 A Yes.

2 Q So would it be fair to say that, as far as the Trump campaign, that entity, that
3 the two things it could be fundraising for would effectively be retiring its campaign debt
4 or recount-related expenses? Is that fair?

5 A Yes.

6 Q And would it also be accurate that, if the campaign would've raised money
7 that surpassed its needs for both debt retirement and for recount-related expenses, that
8 the campaign entity would not be able to spend that money, at least in its current form,
9 in 2020 or 2021? Is that fair?

10 A My understanding, that those funds that were raised above whatever the
11 debt was from the primary in 2020 would have to be returned to the donor.

12 Q Okay. So, just to recap, if the campaign raised money and didn't have
13 recount-related expenses or debt to retire, it would have to give that money back to the
14 donors. Is that right?

15 A That's my understanding, yeah.

16 Q Okay.

17 Now, post-election, the campaign was very successful in its fundraising efforts.
18 And were you involved with any discussions as to the campaign raising more money than
19 it would need for both debt retirement and recount-related expenses potentially?

20 A Raising more than? No. It was -- and not having an idea on what the total
21 recount amount need would be, I worked with Justin Clark on what the budget would be
22 or what the total amount of need would be, and it was still up in the air. So the only
23 discussions I had, it wasn't to raise more money than we needed; it was, what amount do
24 we need?

25 Q Well, I understand you can't know what you don't know. But the campaign

1 raised \$207 million in the first 3 weeks after the election, and is it fair to say that no one
2 thought the campaign would need over \$200 million for recount expenses, correct?

3 A I mean, yeah, I would -- that 200-and-something million dollars is a lot of
4 money, so --

5 Q Well, understanding it's a whole lot of money, is it not fair to say that no one
6 thought that the campaign needed hundreds of millions of dollars to handle its
7 recount-related expenses, correct?

8 A So a recount-related expense being the fundraising efforts as well, you
9 do -- it does cost a decent amount of money to raise funds, so a recount-related expense
10 would be the fundraising towards recount. So, if you have debt and you have recount
11 expenses, you're looking at raising probably close to double what you would need,
12 because it cost, like, 50 percent to raise -- the cost of fundraising to raise those funds.

13

BY [REDACTED]

14 Q Mr. Dollman, you just made an interesting point that I want to ask you
15 about. If you're fundraising -- you just said, if you're fundraising to conduct a recount,
16 it's a recount-related expense.

17 A If you are fundraising towards recount, right, so if you're sending out an
18 email for recount fundraising, then it could be allocated as a recount expense.

19 Q To the best of you --

20 A Because, otherwise, how do you raise -- how do you raise for recount?

21 Q Yeah. To the best of your knowledge and understanding -- like, you know, I
22 understand you may say this is a legal answer, so I just want to the best of your
23 understanding -- do you actually have to intend to request a recount to do fundraising for
24 recount purposes?

25 Or, if you just put in a fundraising email, "Oh, we're going to do recounts" or -- or,

1 like, what's the rule for what constitutes fundraising for the purposes of recount-related
2 expenses, in the sense of, do you actually have to do the recount, or do you just have to
3 mention recount?

4 A That's a great question. I do not know on that. I don't think that would've
5 crossed my mind, if you didn't have a recount, to raise towards recount.

6 Q The reason I ask is because -- and we'll come to this in a little bit -- there
7 are recount-related expenses that Save America is paying as of months ago, over a year
8 after an election.

9 So I'm curious, I know you left, but prior to your leaving, I would just love to know,
10 what's your understanding of a recount-related expense a year after an election has been
11 decided?

12 A So, I apologize. I think you said that Save America was paying
13 recount-related expenses?

14 Q Oh, I'm sorry. I misstated. It's the -- what do they call it? The
15 authorized account -- basically what the campaign became. MAGA PAC, I believe?

16 A MAGA PAC, yes, ma'am.

17 So -- I apologize. I got hung up on "Save America."

18 So, if it's a recount-related expense, because I don't really have that knowledge on
19 what would be recount or not recount, I would rely on legal's approval for -- or did rely on
20 legal's approval to pay recount expenses. And that was post-election all the way
21 through the time I left the campaign.

22 Q Okay. And I don't want to skip ahead, so we'll come back to that. I just
23 was -- it was just -- I was curious.

24

BY 

25 Q So, Mr. Dollman, I want to talk -- I want to keep going down the line about

1 the amount of money raised.

2 A Uh-huh.

3 Q So, when the campaign is raising these large amounts of funds through
4 TMAGAC post-election period, is it fair to say that the campaign -- and I don't want to use
5 the word "risk," but the campaign -- I'll say "risk" -- runs the risk of raising far more money
6 than the campaign entity can actually spend for either debt retirement or for
7 recount-related expenses? Is that fair?

8 A I mean, is it fair to say that they risk raising too much money? Is that what
9 you're saying? To cover debt and recount expenses?

10 Q Yes.

11 A I mean, I don't really know what the risk would be if you have to send it back
12 to donors that donated.

13 Q But let's talk about what the campaign here did.

14 Save America is formed, I believe, around November 9th. When did you first
15 hear about the President wanting to form a leadership PAC?

16 A It was post-election. I don't remember when.

17 Q So, if it's post-election, that would be sometime between election day on
18 November 3rd and its formation on November 9th then?

19 A I mean, it was probably closer to the formation of Save America, because I
20 really wasn't too involved in Save America.

21 Q So tell us about when you first learned about it. And who did you learn
22 about it from?

23 A I don't -- like I said, I don't remember the day. But I believe it was Alex
24 Cannon was the one that told me that they were probably going to set up a -- form a
25 leadership PAC.

1 Q And tell us -- and why did he tell you that they were going to do that?

2 A Why -- did you say why did he tell me?

3 Q Yeah, like -- well, let me explain that. What was the reason for him telling
4 you, and what did he say the reason for setting up the leadership PAC was?

5 A He didn't tell me -- so I'm -- I knew campaign, but I don't know leadership
6 PACs. I've never really been a part of a leadership PAC. I didn't know how the
7 fundraising was. I don't know why he would've told me besides the fact that, you know,
8 I was overseeing accounts receivable and accounts payable.

9 Q Uh-huh.

10 Now, understanding you have not done leadership PACs, but is it fair to say that
11 leadership PACs -- or the leadership PAC here would be how President Trump would kind
12 of support his future political endeavors after a potential Presidency?

13 A So my understanding is, a leadership PAC cannot spend funds on himself, so
14 a candidate himself. So, if it was Mr. Trump's future political endeavors, I think -- my
15 understanding is the Save America would not be able to spend any of its funds on his own
16 candidacy, but he would be able to support other candidates and, like, committees or
17 organizations. That's my understanding of it.

18 [REDACTED] That's if he declared, right? If you don't declare and you're not a
19 candidate, then the leadership PAC can spend money.

20 Mr. Dollman. The leadership PAC can spend money, but if he doesn't declare,
21 then he's not a candidate, so you wouldn't be spending on your candidacy.

22 BY [REDACTED]

23 Q Okay. So Mr. Cannon tells you that there's going to be a formation for Save
24 America. And did he talk to you how Save America is going to raise money?

25 A I don't -- I don't recall. I think it would be the same way, fundraising.

1 Q Through T- --

2 A I believe it was added to the JFC.

3 Q Okay. It was. So you have -- the campaign was raising money upon trying
4 to raise money with an election defense fund to support its recount efforts to challenge
5 the election. And then Mr. Cannon comes to you and says, the President is forming a
6 leadership PAC, which goal is not going to be to help the election, and that's going to be
7 added to the joint fundraising agreement under TMAGAC.

8 Is that all accurate?

9 A Yeah, the Save America was being added to TMAGA is accurate. I don't
10 really know what -- I don't remember what you said in the middle of that, though. Like,
11 that Save America was being added to TMAGA, that's correct.

12 Q Well, here's what I want to understand, Mr. Dollman. Around this time,
13 we've seen your emails with trackers, and we'll talk about recount expenses. And you're
14 trying to understand, you know, is there enough money for recount, is the debt being
15 paid off, trying to make sure the campaign is ending in good financial health.

16 And, while all that is going on, the campaign is also raising money because it says
17 it's challenging the election, correct?

18 A Yes.

19 Q Okay.

20 So, with all that as a backdrop, Alex Cannon comes to you and says, the President
21 is going to form Save America and that's going to be added to the JFA.

22 And what we see in the documents is that Save America now becomes the
23 primary vehicle by which President Trump is taking the funds raised from TMAGAC.

24 Is that a fair description of what happened?

25 A I don't have TMAGA's, like, breakout of fundraising, so the percentage

1 breakouts, in front of me. But it is fair to say that it became -- I believe it was the first,
2 like, waterfall in the percentage of TMAGA allocated to not the RNC but to DJTFP
3 category.

4 ██████████ Yeah. And we don't want to overcomplicate it, because this is
5 pretty -- it seems like what happened -- and you correct me if I'm wrong, to the extent
6 that you were involved in the conversations.

7 It seems like what happens is they scrambled and didn't realize that they needed
8 to have some kind of mechanism that had broader spending flexibility. You're raising
9 millions of dollars the day of the election, days after the election, to two accounts that
10 are incredibly limited: retiring campaign debt and legal recount.

11 And, to my colleague's point, all the recount fundraising in the world, in 50 States,
12 wasn't going to total \$200 million, and you don't want this money sitting in an
13 unspendable pool. So they scramble to create Save America on November 9th, and then
14 all the money starts going in there.

15 And leadership PACs are a very common thing, right? This is actually pretty
16 common, I think, in campaigns. The less common thing was that you guys didn't already
17 have it set up and didn't know this was coming and kind of had to scramble. But the
18 leadership PAC isn't a foreign concept. The idea of having greater flexibility in spending
19 isn't a foreign concept.

20 You created Save America so you could shove all the money in a way that makes it
21 spendable, right?

22 Mr. Dollman. I think, like you said, leadership PACs aren't uncommon. Most of
23 the time, candidates already have leadership PACs when they're running for
24 congressional office, or even Senators have leadership PACs. Most of them do when
25 they're running for Presidency as well. So it's not uncommon to have.

1 But post-election, my main focus was wind-down. I got brought in to recount to
2 make sure, you know, that I was handling the invoices coming in for recount properly and
3 making sure that legal was approving them. But my Save America, like, involvement
4 wasn't -- it was just looking at the numbers coming in.

5

BY 

6 Q And we appreciate that that's your role, but we want to make sure and just
7 cover, did you have any discussions with anyone?

8 Because your emails, as I said, are focused on getting the numbers correct, making
9 sure the campaign is meeting its obligations. But, you know, we'll show you exhibit 3 in
10 one moment, which is a November 16th email from you to Mr. Kushner, copying Cassidy
11 Dumbauld and Alex Cannon. And it will be up in a minute.

12 And you say, "Hey, Jared. Below is a screenshot of the current position in three
13 accounts." And it then -- you see it indicates the RNC has reached their agreed to
14 \$10 million for events. The next section says, roughly \$3.7 million has been spent out of
15 the recount fund to date. And then it says, the majority of fundraising is going straight
16 to Save America and not the recount/legal account.

17 So we talked about not needing \$200 million for recount-related expenses.
18 Here, this is now November 16th, you know, critical weeks after the election has ended,
19 and you say, roughly \$3.7 million has been spent out of the recount fund to date. And
20 then you note that the majority of fundraising is going straight to Save America, not the
21 recount.

22 So, here, you're very much aware that the massive TMAGAC fundraising apparatus
23 is putting the vast majority of that money in Save America and not the recount/legal
24 account. Is that fair?

25 A Yes. Like I said, I tracked what was coming in.

1 Q Okay.

2 A And the hard part with this is, one, in the very beginning, where I say the
3 RNC met their \$10 million agreement with events, originally the RNC said that they would
4 pay for a number of events, and then later on they changed it to their \$10 million
5 agreement. So anything above that \$10 million that was involved with events that they
6 took ended up being campaign spend, so that went allocated towards debt. So that
7 made it a little difficult to understand the debt of the campaign, given that I thought the
8 RNC was going to pay for their events.

9 The other part of it is, it's really difficult to track funds coming in based off of an
10 allocation. Funds usually take, like, 3 to 5 days to process after a donation, and once
11 those get processed, they have to go through the TMAGA JFC allocation. So, depending
12 on the percentage at the time the funds were raised -- so if the percentage changes, you
13 have to make sure you date it, know it; and when those funds come in, they have to be
14 allocated the way that they were donated.

15 So all of this is pretty high-level, 100,000-foot view based off of an estimate of
16 where funds were coming in. But once it has to get processed, once it has to go through
17 compliance, and then once we have an idea of each individual donor, you know, did they
18 hit their contribution limit, if it was supposed to be allocated to recount -- this is just
19 based on numbers coming in prior to being processed, so it's a very high level. It's just a
20 lot harder to do to get -- you get a way better knowledge of where the funds are allocated
21 by 10 days later -- 10, 15 days later.

22 BY [REDACTED]

23 Q And that's really helpful. I guess one of the things that would be helpful to
24 understand, like, reading this, is -- on this, it looks like you've got \$16-million-and-change
25 in a recount/legal fund. You're budgeting \$2 million for an operating reserve. You've

1 only got \$210,000 in outstanding payables. It doesn't look like you're budgeting
2 additional fundraising for the recount. So you've got a net cash position of
3 \$14-million-and-change for recount/legal.

4 The one recount that you guys paid for, Wisconsin, I think it ended up being more,
5 but let's just leave that for now. But, in your email, you say, "Since we are taking on
6 more legal costs, our 80 percent should have a portion that's allocated to the
7 recount/legal fund."

8 I'm trying to figure out, sitting on \$14 million estimated, why did you think you
9 needed more to the recount/legal fund? Or am I misreading that?

10 A Well, I mean, Wisconsin, like you said, it was \$3 million, not \$2 million. So
11 that's what it ended up being, so that number is wrong.

12 I believe -- like, at this point in time, I think the recount was still unsure on what
13 the total would be, but -- and I apologize, I don't know if I'm mixing up dates or anything,
14 but I believe I was closer to \$20 million for an estimate on recount.

15 Q Well, I guess my question is, if you scroll up, I think -- and, actually, you don't
16 have to scroll. I think this email is dated November 14th -- 16th? So, at this point, a
17 significant amount of any litigation has been filed. In fact, most of the litigation had
18 been filed at this point. Some additional litigation would come in, but I don't believe it
19 was litigation paid for by the campaign.

20 So, to the extent that you're having discussions, who is telling you that you're
21 going to need more money for the recount/legal fund? Or are you just guessing that,
22 based on what you're seeing in terms of the campaign saying, well, we're going to
23 challenge this, we're going to challenge that? Like, where are you getting the basis for
24 your estimate of how much you would need for the recount/legal fund?

25 A That would've been Justin Clark and Matt Morgan.

1 Q Are they giving you those numbers?

2 A Are they giving it to me? Yes.

3 Q Okay.

4 A Like, a dollar amount within States that they were kind of budgeting for.

5 The other side of it is, again, like I said, I didn't know what the RNC was going to
6 pick up and pay for or what the campaign or recount account was going to have to pay for
7 as well.

8 Q Okay.

9 A So, again, it's very hard to do a projection in the campaign world.

10 Q Got it.

11 A Especially like this.

12

BY 

13 Q Mr. Dollman, understanding it's hard to do projections, is it not fair to say
14 that, at this point, the campaign's primary fundraising priority was Save America PAC, that
15 that's where the money was going and had been going since November 9th?

16 As you said, the majority of fundraising was going straight to Save America, were
17 your words. Would it not be fair to say that was the campaign's primary fundraising
18 priority?

19 A The campaign's? I mean, I don't know about the campaign's, because the
20 campaign's priority would've been recount and debt.

21 Q Well, let me ask you this. To the extent that there's an actor here that's not
22 the campaign that is -- I guess that would be President Trump, is the only person who has
23 authority both over the campaign and over Save America. Is that not right?

24 A So the leadership PAC --

25 Q The leadership PAC --

1 A Yeah. So, I mean, that's why here I say, "Since we are taking on more legal
2 costs, our 80 percent should be a portion allocated to recount/legal." So what I'm
3 saying is, we should have more going towards recount/legal versus Save America.

4 And, like I said before, I was just tracking numbers coming in for Save America, but
5 my main focus was general debt and recount and legal.

6 Q And I understand that, Mr. Dollman. Your concern is making sure that bills
7 are paid, that debt's handled. I understand; you're doing your job. I'm asking --

8 A Uh-huh.

9 Q -- the decisions that were made up your chain. And the decision was made
10 that Save America would be the priority for fundraising. That's what's going on here.
11 That's what you're saying, is it not?

12 A Well, I didn't -- but I'm telling you, I don't make that decision, and I didn't
13 make that decision.

14 Q I'm not saying you did, sir. I'm saying, you're acknowledging a decision that
15 someone else made. Is that not fair?

16 A Yes. Wait. It's -- it is fair to say that, yes.

17 Q Okay. But -- so, wait --

18 A To answer your question -- I said "yes," but you ended with "is that not fair,"
19 and then I was like, okay, and you screwed me up there.

20 Q Yeah. So let's just say from the top, so it's clear for the record.

21 Mr. Dollman, is it accurate that someone else that's not you made the decision to
22 make Save America the fundraising priority for the TMAGAC proceeds that President
23 Trump's committees would get?

24 A Yes, that's fair.

25 [REDACTED] And -- oh, go ahead.

1 [REDACTED] No, no, after you.

2 BY [REDACTED]

3 Q And so what I understood you to be saying is, somebody else decided that
4 the majority of fundraising is going straight to Save America and not the recount/legal
5 account. So you say, we should change the JFA to 80/20.

6 And then you note, since we're taking on more legal costs, the money -- all of this
7 money going to Save America, some of it needs to be put to recount/legal fund so that we
8 have enough for that.

9 A Yeah, given the unknown about how much we were going to need to spend
10 in recount/legal.

11 Q And if I understood you a moment before, you were saying Clark and
12 Morgan are telling you -- and I think we're going to come to it -- there is some estimated
13 budget based on all the States of how much they think they'll pay for legal, and you build
14 that in. And, frankly, it's pretty small, fractionally, compared to the amount that's
15 coming in to Save America.

16 But if I understood you, because of how these funds work, you have to make sure
17 that there's enough in the recount/legal account in order to pay for recount/legal. You
18 can put the rest in Save America; just make sure that you put some of it in recount/legal
19 for whatever recount/legal we end up actually doing.

20 A Yes, because you can't raise -- or you can't spend general debt dollars that
21 were raised post-election to recount.

22 Q Got it.

23 A Because that only is associated with general debt.

24 Q Right.

25 And so, to my colleague's point, somebody else says, all the money should go to

1 Save America, and you say, yes, yes, but make sure some of it goes to this so we have
2 enough for whatever recount/legal we do.

3 A Correct.

4 Q Okay.

5 A But I do not know and I still don't understand, like, what a leadership PAC
6 could pay for and if it would be able to pay for recount-related expenses, if that makes
7 sense.

8 Q Well, no, it doesn't, because my theory was that you assumed that
9 recount/legal was what you needed to pay for recount/legal.

10 If you thought Save America could pay for recount/legal expenses, then why
11 would you write, "We need to make sure that a portion's allocated to the recount/legal
12 fund" if Save America could've spent on the recount/legal fund?

13 A I don't know if they could. I just knew the recount/legal fund was not
14 funded to pay for all the expenses that we would think were going to come in.

15 Q Okay.

16 A So I'm saying, now, I still don't understand a leadership PAC, so I don't really
17 know what it can and cannot pay for. But at that point in time, I was focused on recount
18 and debt-related.

19 Q Understood.

20 BY [REDACTED]

21 Q Mr. Dollman, we're going to stay on Save America. We're going to talk
22 about expenses a bit later. But I want to talk about the formation of Save America and
23 some questions you received -- and we can take this down -- some questions that you
24 received from various sources regarding its purpose.

25 We've seen -- and I'm going to -- actually, I think I'm going to skip this document.

1 We've seen that you are on communications regarding filing, you know, the
2 requisite trademark or copyright documentation for Save America regarding
3 November 9th, and that a request is made from Dan Scavino indicating that
4 President Trump himself wanted to own the rights below the Save America PAC, and then
5 those emails eventually end up being sent to you.

6 Now, they were -- I want to show you what's been marked as exhibit 15, which
7 talks a bit -- actually, if you could hold on one second, [REDACTED] I want to make sure that's
8 the right one.

9 Yeah. Yeah. Okay.

10 So, before the formation of Save America PAC, you were included on some emails
11 where reporters were asking questions as to the campaign's fundraising push and as to
12 where those funds were going.

13 Do you remember getting reached out to by Tim Murtaugh, and including you,
14 about where funds were going and whether they were, in fact, going to a legal defense
15 fund or paying down debt?

16 A I don't recall that email.

17 Q Okay. Well, are you aware that the campaign wrote a lot of emails -- sent a
18 lot of emails saying it was raising funds for an official election defense fund?

19 A I saw that on the hearings, yes.

20 Q Well, I'm asking, prior to the hearings, in November and December 2020,
21 were you aware that the campaign was fundraising for an official election defense fund?

22 A I was aware of the recount fund, which is what I thought was the official
23 election defense fund.

24 Q Now -- but you knew that a lot of the money that was being raised was going
25 to Save America PAC, not to the recount fund, correct?

1 A Yes.

2 Q So, when you were aware that emails were going out to the American public
3 saying the campaign was raising money for the official election defense fund and that the
4 majority of that was going to Save America, did you think that was misleading?

5 A I did not -- I did not have a say in what was being put out. And like I told
6 you guys before, I mean, my main focus was recount and debt, and it wasn't that portion
7 of fundraising and the message or anything on that level.

8 Q And, Mr. Dollman, we are well-versed in how the messaging worked, and we
9 know that you were not involved in crafting or otherwise assembling the emails.

10 But what you can help us understand is, to the discussions that are happening
11 behind the scenes with you, with Mr. Kushner, with Mr. Clark, Mr. Stepien, anyone
12 involved at that level, as to the funds that are coming in and where the intention was for
13 these funds to go and what you were told.

14 Does that make sense?

15 A Yes, that makes sense.

16 And to give you a little background, the entire time on 2020, I wanted to be a little
17 bit more involved on decisions or, like, being able to voice something. But I was not in
18 senior staff meetings, I was not in these, you know, higher-level meetings. Most of the
19 time, I found out about things whenever it happened or after it happened, right?

20 So the discussions going on about where funds were being raised and what
21 accounts, the only thing that I did was track the funds. It wasn't so much on the
22 decision-making side of it --

23

BY [REDACTED]

24 Q Mr. Dollman --

25 A -- even all the way to, like, how they make the decisions.

1 Q Yeah, we appreciate that. And I want to make clear, like, we do understand
2 your position-slash-role. So I do want to make that clear.

3 But when we're asking you about this, it's because we've talked to other witnesses
4 in this case, and they also weren't necessarily, quote, "the decision-maker," but they were
5 involved, they saw the messaging that was put in the emails, they were aware of where
6 the money was actually going, they were aware that reporters were saying, "Hey, the
7 money is going to Save America, not the official election defense fund," and they had
8 conversations and they raised concerns.

9 So what we're trying to figure out is, A, did you even have -- did you have the
10 concerns? Did you feel or think things? B, if you did, did you raise that to anyone?
11 And C, if you had those concerns and you didn't raise it, why not?

12 We're trying to get from you what was happening at the time. Because there
13 were clearly people who absolutely saw what was going out in those fundraising
14 messages or who knew that the money was going to Save America who had qualms about
15 the fact that it was not, in fact, going to an official election defense fund.

16 So our question to you isn't, were you the decision-maker who put the election
17 defense fund in an email? We know you weren't. We are also not asking you, were
18 you the one who decided to put all the money in Save America? We know you weren't.

19 What we do see is you on a ton of emails, having these discussions, making it very
20 hard for you to be completely unaware that, while all the money is going to Save America,
21 it is not going to an official election defense fund. But that official election defense fund
22 messaging is what's bringing in millions and millions of dollars each day for weeks and
23 months after the election.

24 So, understanding that you didn't decide to do it, we're trying to ask if you were
25 aware of what was going on and did you have qualms or misgivings about it. Let's start

1 there.

2 A Okay. So the end of that is the question of, did I -- was I aware. I -- and I
3 have told you guys this, that my focus -- what my focus was, right? So it was recount
4 and debt retirement.

5 It was -- I didn't -- and a lot of other people on the campaign were very involved in
6 different departments and what was going on. Was I aware of Save America? Yes, I
7 was aware of Save America.

8 I don't believe I had any, like, qualms -- I think you said "qualms" -- with, like, Save
9 America. It was just -- to me, I was doing my job of tracking funds and paying invoices.
10 I was just doing my job. So it wasn't so much of looking into all that other stuff.

11 Mr. Dhillon. So we're at noon. You've been at it for a couple hours, I guess. I
12 assume we're going to take a lunch break. We had talked about that on Friday. Is this
13 a good time to take that lunch break?

14 Or do you want to -- I don't know how much time you have. I know we did the
15 home interview. You all wanted to kind of press through. So I'm just inquiring whether
16 this is a good time for a break or what your schedule looks like.

17 [REDACTED] I think it's a good time to do a lunch break. And then I
18 think -- so let's take a lunch break now, and let's aim for around 30 minutes?

19 Mr. Dhillon. That's fine.

20 [REDACTED] And then, when we come back, we will go -- I would be
21 prepared to go at least till 3:00 p.m.

22 Mr. Dhillon. Okay.

23 [REDACTED] And our hope is that we can be done by 3:00, but we've
24 set a lot of good foundation, so we're ready, I think, to move at a quicker clip.

25 So let's take a half-hour now. We'll come back at 12:30, and then we'll push

1 through till 3:00.

2 Mr. Dhillon. Very good. We'll see you at 12:30. Thank you.

3  All right. Thank you.

4 [Recess.]

1

2 [12:37 p.m.]

3 [REDACTED] [REDACTED] will be back later to join us. All right.

4

BY [REDACTED]

5

6 Q Mr. Dollman, when we left last, we were talking about the Save America
7 PAC, President Trump's leadership PAC. And we had established that around
8 November 9th the PAC was formed and that the PAC, by November 16th, based on your
9 email, was accepting the majority of the funds raised through TMAGAC. Is that all
correct?

10 A Yes, that is correct. But did we determine that Save America was raising
11 the most funds due to my email?

12 Q Well, when you say "did we determine," I mean, I want to parse out, your
13 email says that Save America was -- the majority of the fundraising was going to Save
14 America. The exact language is, quote, "The majority of fundraising is going straight to
15 Save America and not the recount/legal account." And you sent that email to Jared
16 Kushner on November 16th.

17 So is it fair to say that when you would've sent that email, in November of 2020,
18 you would've believed to the best of your ability that that statement was accurate?

19 A Yes, sir.

20 Q Okay.

21 And I want to talk a bit about conversations that you may have been privy to
22 around Save America. And we understand that you were not involved -- you were not a
23 decision-maker as to whether or not funds would go to Save America, but we still want to
24 unpack your knowledge as to some of these conversations.

25 So I'm going to show you what's been marked, in a minute, as exhibit 16.

1 Or, actually, let's start with exhibit 15, actually. Exhibit 15 would be great.

2 I'm sorry, Mr. Dollman?

3 A On your -- your notes that's in there, the camera a little bit, I didn't know if
4 you wanted to zoom in a little bit more.

5 Q Oh, to zoom in -- okay. Sorry.

6 A Oh, not you guys. I was talking to my lawyer. I think when he sits at the
7 table --

8 Q Okay.

9 A -- it was just -- it's just, like, the front of your face a little bit there.

10 Q All right.

11 So, Mr. Dollman, here's an email from November 8th. This is the day before Save
12 America PAC is formed. And it's an email from a reporter at NBC, and she says to
13 Mr. Murtaugh and others in the press team with the campaign -- it says, "Question about
14 fundraising emails, legal defense fund."

15 And she says, "Hey, guys. I'm writing about the fundraising push the campaign
16 has been making for a legal defense fund. I saw in email that it says 60 percent of
17 donations go to the campaign to pay any outstanding, and that the money only goes to a
18 legal defense fund if the campaign has already paid down its debts or someone has
19 maxed out in what they can give to the general election account."

20 And in the last sentence it says, "How much has the campaign raised since election
21 day, and how much has go towards a legal defense fund?", with some obvious typos
22 there.

23 And Mr. Murtaugh says at the top, "Do we even care to answer questions like
24 this? Is this breakdown accurate?" And Mr. Miller responds, "Nah."

25 Now, Mr. Murtaugh was the comms director for the campaign, correct?

1 A Yes, sir, that's correct.

2 Q And sometimes he would receive emails or inquiries from the media, and he
3 might copy senior individuals from the campaign to have them weigh in, to form the press
4 team's response, correct?

5 A Yes, that's correct.

6 Q And sometimes he may include you in those such emails, which this would
7 be one example of that, correct?

8 A Am I included in this email?

9 Q You see there on the CC, there's Justin Clark, Sean Dollman -- do you see
10 that?

11 Mr. May. Counsel, just so you know -- this is Justin May talking -- on our screen,
12 we have to zoom around so we can make it big enough for Mr. Dollman to see. So we're
13 pulling it up on our end. We can't see the whole document, like you can, at the same
14 time.

15 Mr. Dollman. There it is.

16 [REDACTED] Does this help?

17 [REDACTED] When you say you can't -- you're saying you can't see both
18 the video of us and the document we're sharing?

19 Mr. May. So we --

20 Mr. Dollman. No.

21 Mr. May. We have to make you very, very small, on the side, in order to see the
22 document that we're reviewing.

23 Mr. Dollman. We have to show -- your video feed is very small, but we have to
24 open up the side for the document, and then we have to zoom in on the document. So
25 we have to scroll up and down on the document.

1 So, when you were saying I was CC'ed, we were on the question from the
2 reporter, so we had to scroll up to it.

3 [REDACTED] Got it. So, just for the sake -- are you able to scroll
4 through the document on your own?

5 Mr. Dollman. Yes.

6 Mr. May. No.

7 Mr. Dollman. Wait. No? I thought you just -- hold on.

8 Mr. May. This is Mr. May again.

9 [REDACTED] Yeah.

10 Mr. May. Whatever you put on the screen, we have to zoom in on your sharing
11 of the screen --

12 [REDACTED] Got it.

13 Mr. May. -- so we can actually make out the print, because it's too small on the
14 screen for us to see.

15 BY [REDACTED]

16 Q Okay. So we've now zoomed in our end. Are you able to read this email
17 now, Mr. Dollman?

18 A Yes.

19 Q Okay. And do you see that you're copied there?

20 A Yes.

21 Q Okay.

22 So is it fair that -- is this not one of the examples of Mr. Murtaugh reaching out to
23 senior campaign officials to have them weigh in as to whether or not the press team
24 should respond to an inquiry?

25 A Yes.

1 Q And the press also reached out many times when it came to Save America,
2 did it not?

3 A I don't know the number of times.

4 Q Well, I'm saying, is it fair to say that you recall that there were numerous
5 times where the press team reached out as to where -- as to the fundraising proceeds
6 going to Save America PAC?

7 A That the campaign's press team reached out asking about funds going to
8 Save America PAC, or the press reaching out to the campaign?

9 Q The press reaching out to the campaign asking --

10 A Okay.

11 Q -- as to why the fundraising proceeds were going to Save America PAC. Do
12 you remember that being a thing that came up?

13 A I do remember that, yes.

14 Q And what do you recall about those inquiries? Well, let me ask you this
15 way: Is it fair to say that the press was asking questions about why the campaign was
16 raising money to defend an election -- or, defend election integrity but was sending the
17 money to a leadership PAC?

18 A So is it fair to say that the press were reaching out asking about funds being
19 raised for election integrity but they were going to a leadership PAC? Is that what
20 you're saying?

21 Q Yes.

22 A Yes, they did reach out about funds going to the leadership PAC.

23 Q All right.

24 I'm going to show you one example of that, which has been marked as exhibit 16.
25 And it'll be up in one moment, but it's -- we're going to scroll to the bottom of page

1 1 -- up, please -- and it's an email from a Reuters reporter.

2 And you'll see later on that you are sent this email, so I'll represent that to you
3 now, and then we can talk about -- well, I'll show you that.

4 The reporter says, "I'm a Reuters reporter working on a story about the joint
5 fundraising effort between the Trump campaign and the RNC that now includes Save
6 America. We hope that someone from Red Curve or the PAC can address some
7 questions about this effort. Donors are being asked for money to 'defend' election
8 integrity and stop an attempt to 'steal' the election, but, in fact, the legal disclosure says
9 all money is being routed to Save America and the RNC until donations reach an
10 individual's legal limits. Is the fundraising campaign misleading?"

11 It says, "Why is the President and the campaign setting up a leadership PAC?
12 What do you anticipate will be the purpose of this fundraising?"

13 And if we scroll up, Jason Young -- do you know who that is, Jason Young?

14 A Yes, sir.

15 Q And who is that?

16 A He worked for Red Curve.

17 Q All right.

18 So Mr. Young says, "Hey, guys. We've gotten several inquiries for this, as
19 expected. Should we keep passing along, and to who?"

20 And you see it's to Mr. Murtaugh, Justin Clark, Alex Cannon, you, and copies
21 Bradley Crate. Do you see that you were included with this email?

22 A Yes.

23 Q Do you recall getting this email?

24 A No, I don't.

25 Q Do you recall getting emails like this?

1 A No, I don't, but --

2 Q Now --

3 A -- [inaudible].

4 Q Pardon me?

5 A I said I don't recall getting emails like this, but I do remember hearing that
6 there were questions from reporters.

7 Q And what did you hear about those questions?

8 A I mean, like, what's in this email here.

9 Q And --

10 A My only thing was, who on the press team was going to be responding to
11 press inquiries.

12 Q Can you expand on that, please?

13 A It wasn't my job to respond to these, so it was, who would these be
14 forwarded to to make sure that they're responding to questions from press.

15 Q Yeah. But when the press team gets inquiries from the press, they rely on
16 campaign staffers to give directions as to what the facts are, correct?

17 A If it's a question about numbers or what the split is, we can only provide
18 what we have access to, which is the numbers and the split in TMAGA.

19 Q What I'm asking is broader than that. Here, the question is as to the
20 disconnect between the request to donors for money to defend election integrity or to
21 stop the stealing of an election but the money is going to Save America.

22 Did you have conversations with Justin Clark, Alex Cannon, or Tim Murtaugh about
23 this issue? Or Bill Stepien?

24 A I don't recall conversations about that.

25 Q Did you ever give thought to whether or not there was an issue here with

1 misleading fundraising?

2 A No. I assumed that, you know, comms and whoever was putting together
3 the copy were going through legal and making sure that, you know, the boxes were
4 checked before they sent it off.

5 Q Well, I'm not asking you whether it was legal --

6 A And --

7 Q -- sir. Sorry, I didn't mean to interrupt you. Did you have something else
8 you wanted to --

9 A No, it's all right.

10 I mean, I just kept my -- I kept my head down and worked on my own stuff. And,
11 like I told you, told everybody before, I did my job. And in the military, like, we had a
12 saying of "stay in your lane." If it didn't involve me and it wasn't my job, then I would
13 not get in the mix of comms.

14 A lot of people within politics think that they're the comms team even if they work
15 in political, and they want to interject themselves, but I stayed focused on my own job.

16 Q And I appreciate that, Mr. Dollman. What I want to understand, though, is
17 whether you were involved with any conversations that had to do with this topic,
18 separate from whether or not it impacted your job.

19 Did you have any conversations with anyone as to whether or not the fundraising
20 appeals were misleading?

21 A I don't recall any conversations about that.

22 Q Did anyone ever express to you that they thought that there was an issue
23 with the fundraising emails and what they represented the money to be going to?

24 A I do not recall anybody coming to me about it.

25 Q Were you aware at the time that the money -- that donors were being asked

- 1 for money to defend election integrity and to stop an attempt to steal the election?

1

2 [12:51 p.m.]

3 A I was aware of -- I didn't really know what was in the messaging or the
4 emails themselves, but I do know that Save America as a leadership PAC was raising funds
5 to support candidates and organizations that believe in election integrity.

6

BY [REDACTED]

7 Q So -- but you knew that the Save America was not going to be spending that
8 money on anything to do with the 2020 election, though, correct?

9 A I don't know what Save America planned on spending money for.

10 Q Let me ask you this. Have you ever worked with Save America?

11 A Have I ever worked for Save America?

12 Q Yes.

13 A Yes.

14 Q And tell us about when you first started working for Save America.

15 A So after the campaign, I just wanted to move back to Arizona and continue
16 the wind-down effort of the campaign. I was asked to put together a mock budget. It
17 made it really difficult since I don't know Save America spend. I think it was February
18 of 2021. But I just try to help out. I said I'll help. And then I would be -- Jane and I
19 looked up, and I think it was April or May of 2021.

20 Q And who brought you on? Who hired you?

21 A I think it was Susie Wiles.

22 Q And what's her role at Save America?

23 A I believe she's a senior adviser for Save America.

24 Q And when you say Save America, is that effectively saying she's a senior
25 adviser of President Trump?

1 A I don't know what her role is. I mean, campaigns are a little, you know,
2 different, and same with these committees. I don't know what her actual title is. I
3 don't know if there's -- there are titles in a lot of this stuff, but she -- what I do know is
4 she was Save America's senior adviser.

5 Q So February 2021 is when you left the Trump campaign. Is that -- I want to
6 get these dates right.

7 A No. I left the Trump campaign this year in February 2022. February 2021,
8 I was still working a wind-down. And when I said I left -- I apologize -- I was back in
9 Arizona, and I just wanted to work on the wind-down of the campaign. And I was asked
10 to put like a little mock budget together in February. And then I think it was April
11 of 2021, I got on to Save America. And I don't know if it was April or not, but I think it
12 was. So I was both the campaign wind-down and Save America.

13 Q Okay. So are you still with Save America now?

14 A No. No, sir.

15 Q And when did you leave Save America?

16 A February of this year, sir.

17 Q Okay. So in February of this year you left both Save America and you left
18 the Trump campaign or whatever entity that has now become?

19 A Yes, sir.

20 Q Okay. When you joined Save America, how much were you compensated
21 for your work, and what was your responsibilities that you were told you would be doing
22 for them?

23 A So it was my normal comptroller responsibilities, just tracking where spend
24 was and tracking funds being raised, and then making sure that invoices associated with
25 Save America were approved.

1 Q Okay. And how much were you compensated for that?

2 A I think it was 10,000 a month.

3 Q And then when you were -- from the period of February 2020, that same
4 time period when you were working for the campaign, were you doing what you
5 discussed previously about helping wind down, handle invoices, that kind of thing, kind of
6 the remnants work?

7 A Yes, sir.

8 Q And how much were you compensated by the campaign?

9 A 20,000 a month.

10 Q And was the \$20,000 a month, was that your salary also during the
11 campaign?

12 A Yes, sir.

13 Q Okay. And was that for the duration of your time with the Trump
14 campaign, or tell us about when did that -- your salary become 20,000 a month?

15 A It was -- I mean it was like 2017, 2018 timeframe. I don't --

16 Q So as far as you recall, kind of before the 2020 cycle. Is that fair?

17 A That makes it a little difficult, because the 2020 cycle started when he
18 reannounced again, right. I think it might have been 2017. So I would say in the 2020
19 cycle, but I don't believe it was within the 2016 cycle.

20 Q Okay. All right. So --

21 A [Inaudible.]

22 Q Now, when you joined Save America and you put up -- when you put up a
23 budget, what was that budget for?

24 A Just understanding that -- what was it for or who was it for? I apologize.

25 Q Well, did Susie Wile [sic] ask you to put together the budget in February

1 of 2021?

2 A I believe she asked Justin Clark and Alex Cannon to put one together, and
3 they reached out to me to put it together.

4 Q Okay. And then, what did they tell you to -- like, what were you told to do?
5 What was the budget for?

6 A I think it was -- I mean, I don't know, I don't remember exactly what it was
7 for, but it was to understand with like personnel and spend for events for Save America,
8 and the candidate contributions and contributions to other organizations. The hard part
9 with that, again, like anything else, is I never put one together before for a leadership
10 PAC, and so it was a lot of guesswork from me.

11 Q So then you did that and then you submitted it. Did you have any feedback
12 from Ms. Wile before you were brought on in April of 2021 about the budget, or from
13 Justin Clark?

14 A It was just condensing it to a quarterly basis instead of a monthly.

15 Q And when you were brought on --

16 A I don't recall, like, any other -- sorry. I apologize. I don't recall any other,
17 like, comments. I know I worked on it for about 2 or 3 weeks.

18 Q Now, when you joined Save America, did you have the opportunity to review
19 Save America's finances?

20 A Like, where they were, what funds and spend or --

21 Q Exactly.

22 A I could -- I could see it. I didn't review and go through everything, no.

23 Q What I'm trying to understand, Mr. Dollman, is your knowledge as to what
24 Save America spent, if anything, as it related to challenging the 2020 Presidential election.
25 Looking at FEC disclosures, and my colleague will correct me if I'm wrong, but as far as by

1 the end of December in 2020, Save America, I think, had only reported spending money
2 on WinRed processing fees for that year. And by the time you come on in April of 2021,
3 are you aware of Save America spending any money related to the 2020 election?

4 A I don't -- I don't recall the time period or spend, but I'm pretty sure all of it
5 would be reported on the FEC report.

6 Q No, I understand that, sir, but the FEC report can be limited in detail. So I'm
7 asking you, are you aware of Save America spending any money related to challenging the
8 2020 Presidential election?

9 A Prior to myself coming on. I guess I -- I mean, it's not -- I don't know the
10 spend itself, right? I mean, it's approved to be paid, but I don't always know where,
11 what it's for, for challenge an election or -- I do know candidate contributions. But I
12 don't recall seeing challenges in the 2020 election.

13 Q So is it not fair to infer that then they were not for -- let me rephrase that,
14 Mr. Dollman.

15 Looking at the disclosures, it appears apparent that Save America was not
16 spending any significant funds in challenging the 2020 election. And I'm asking you,
17 when you joined Save America and had the opportunity to review its finances, did you see
18 anything to make you believe that Save America was spending money and to challenge
19 the 2020 election?

20 A I mean, I -- the leadership PAC itself and raising money for election integrity
21 and supporting candidates and organizations, if you're spending money, I don't know
22 about the 2020 election, but your goal would be to spend it more towards the primary, to
23 help candidates get elected for the midterms, right? So I don't know the extent of
24 spend prior to me coming on. And I guess plus besides like candidate contributions and
25 helping candidates get elected.

1 Q So Save America was focused on looking at the midterms and doing what
2 leadership PACS do, which is trying to get candidates elected, right?

3 A That support election integrity, but I -- again, I don't make the decision on,
4 you know, what the PAC or leadership PAC would be spending money on. I just
5 managed the invoices.

6 Q Sir, I understand you are not making decisions, and take that as something I
7 understand for all of what we're going to discuss, that there are people that you report to
8 who are making those dispositive decisions.

9 What I'm asking you, sir, is that you have the insight of working both for the
10 Trump campaign and for Save America, and understanding invoices that were coming in
11 post-election for the Trump campaign and also understanding invoices that are -- and
12 fundraising that happened at Save America. Is there any reason you have to believe that
13 Save America spent any substantial amount of money to challenge the 2020 -- to directly
14 challenge the 2020 Presidential election, which obviously by the time you come on, Joe
15 Biden has been President for several months. So the answer may seem obvious, but I
16 am still going to ask you nonetheless.

17 A I mean, all the spend out of Save America has probably been reported. So
18 if it's on the FEC report and how it was spent, you would be able to get a determination
19 on whether it was spent on the 2020 election.

20 Q Are you saying -- put that aside, sir. Hold on. Put that aside. I'm asking
21 you what your knowledge is. When you were involved with the approving of invoices
22 and reviewing those, are you aware of any -- of any spending by, let's say, from April 2021
23 and earlier, that was related to the 2020 Presidential election, directly related? Are you
24 aware of any spending with Save America?

25 A I apologize for the pause here. I'm trying to think, you know, in a way -- it's

1 a pretty long time ago.

2 Can I get a sec to talk to counsel real quick about that?

3 Q Of course, sir.

4 A Thank you.

5 [Recess.]

6 [REDACTED] Mr. Dollman, are you ready to proceed?

7 Mr. Dollman. Yes.

8 BY [REDACTED]

9 Q Okay. So I think the question we have is, from everything we've seen, it
10 appears that Save America did not spend funds related to the -- directly related to
11 challenging the 2020 Presidential cycle. Is there any reason for you to contest that
12 statement or dispute it?

13 A And here's what I wanted to make sure I understood.

14 Mr. Dhillon. [Inaudible] our conversation. Answer the question.

15 Mr. Dollman. What was the timeframe of when you're asking, was it before I
16 came on to Save America. I didn't go back and review every expense in Save America.
17 I just knew the total numbers for expenses in Save America. So I don't know entirely on
18 whether anything was spent towards the 2020 election. I don't recall.

19 But moving forward, I know that they -- Save America contributed or donated to
20 organizations that were helping support efforts like recount efforts.

21 BY [REDACTED]

22 Q Now, with your work with Save America, can you tell us, who were the other
23 senior individuals as you understood them to be in 2021 in Save America?

24 A I said Susie Wiles already. Outside of that, Justin Clark on the legal side,
25 with Alex Cannon. Political was -- Bill Stepien helped with political. David Budowich

1 [sic] was in comms. I think -- I think that's really it on like the senior level.

2 Q In the post-election period to the present day, what interactions have you
3 had with President Trump?

4 A I had one -- one meeting in the Oval Office with President Trump.

5 Q And when was that?

6 A It was sometime mid-December of 2020.

7 Q And tell us about how that meeting came about.

8 A I received a call from Jason Miller telling me that POTUS wanted to meet the
9 person that was handling the money; asked me to put together a one-page, like, slide of
10 wind-down recount of Save America.

11 Q And did you do that?

12 A Yes.

13 Q And did you present those findings to the President?

14 A Yes.

15 Q Tell us about that meeting.

16 A So it was my first time in the Oval Office, and so I was nervous. I drank
17 coffee right beforehand, which doesn't help because I sweat all the time. And when I
18 got into the Oval, I sat in a chair and just really like started feeling a little nervous,
19 anxious, because I didn't know what the questions were going to be. But that's really all
20 I remember about the conversation. I think there was one thing -- not even a
21 conversation, a meeting -- he asked me one time if I played golf, and I told him I did.

22 Q Let's talk about the substance of the meeting. What did you tell the
23 President and what did he say in response?

24 A He asked me if I wrote the checks. And I said, no, I do not. I really don't
25 recall a whole lot of that meeting, to be honest with you. Again, it was my first time.

1 Q What else was discussed?

2 A The first time Oval and like sitting in front of the President.

3 Q What else did he ask you?

4 A I don't -- I don't recall the conversation.

5 Q Did he ask you about how much money had been raised by Save America?

6 A I don't recall.

7 Q Did you tell him how much money had been saved by Save America -- raised
8 by Save America?

9 A I believe it was in my slide, that.

10 Q And who else was in that meeting with you?

11 A Jason Miller, myself, Alex Cannon, and then another lawyer, I believe -- oh,
12 Jared Kushner, and another lawyer.

13 Q And how long did the meeting last?

14 A I don't remember, sir.

15 Q I mean, was it a 20-minute meeting or were you there for hours?

16 A It was a short meeting. I felt like it went pretty quick, but I couldn't tell you
17 the timeframe.

18 Q Would you say it was less than an hour? Or close to an hour?

19 A I'd say less than an hour, sir.

20 Q So we're going to talk about that meeting. I want to -- and it's going to
21 connect what we're saying with Save America.

22 Do you recall discussions as to reporting requirements for the FEC over -- that was
23 touched upon Save America about how to report the amount of money that Save America
24 had raised?

25 A I don't recall that conversation.

1 Q I'm going to show you what's been marked as exhibit 18. And it begins with
2 a December 1st email from you. We're going to start at the bottom of page 2 of that
3 email. It's an email from you to Bill Stepien, Justin Clark, Jason Miller, Tim Murtaugh.
4 And you cc'd Bradley Crate, Jason Young, and Alex Cannon. And the subject line is 12/3
5 FEC report. Do you see that?

6 A Yes.

7 Q And you say, Hey, team, some background on the 12/3 FEC report, which is
8 from 10/15 to 11/23. And you say, Note, total raise for the four entities is roughly 390
9 million. And SA -- that stands for Save America, correct?

10 A Yes, sir.

11 Q It says, Save America has now received a distribution from TMAGA.
12 And then it says COH. And what does COH stand for? Cash on hand?

13 A Cash on hand. Yes, sir.

14 Q It says, Case on hand will look minimal for Save America on this report.
15 And it says, Funds for Save America are sitting in the TMAGA -- excuse
16 me -- ending cash in hand pending distribution.

17 Tell us what that means. What are you saying here?

18 A So on the JFC, the funds that are raised within the JFC, the participants can
19 request the distribution, or there can be -- it will stay in the JFC until distribution occurs.

20 What this is saying is Save America did not receive a distribution and it wasn't
21 transferred from TMAGA. So a portion or allocation of funds raised were not sent to
22 Save America; they were still in the JFC, TMAGA.

23 Q So on paper, when the FEC has reported their funds, money that was going
24 to go to Save America would appear to still be with TMAGA, the campaign basically,
25 correct?

1 A Yes, sir.

2 Q Now, what made you write this email to these senior officials at the
3 campaign?

4 A To give them insight on what the FEC report would look like.

5 Q And are there -- is it not normal with campaigns to want to know what an
6 FEC report would look like because that could garner some media attention, correct?

7 A Yes, sir.

8 Q And is it fair that here there was a concern that Save America -- if Save
9 America had a lot of money on its account, that might get negative media attention.
10 Isn't that right?

11 A This was actually from, what I can recall, was an error on my own side
12 without requesting the distributions to go from TMAGA to Save America. This was me
13 informing people that Save America would have a low-dollar amount on hand, and there
14 was no distribution from TMAGA. Like stated before, I didn't work for Save America, I
15 didn't request it, but I also didn't flag it with anybody for Save America to receive a
16 distribution prior to the FEC report.

17 Q Had someone expressed to you whether it would be good or bad for the
18 distribution to happen before or after the FEC report?

19 A I don't know if it would be good or bad if it was, like I said, an error myself.
20 If I'm doing FEC reports, I'd rather show the cash on hand in Save America, whether good
21 or bad, for media attention. Because after this, the first FEC report for Save America in
22 2021, the distribution occurred and it had like a negative impact with the press team, and
23 it would've been better to do it then in 2020.

24 Q When you say it would've been better, I want to talk about the decisions
25 that were made in 20 -- excuse me, in 2020. So not so much looking back what decisions

1 were made at that time.

2 So here, we're going to scroll -- give me one second, Mr. Dollman, I want to make
3 sure they're not turned around.

4 A Yes, sir.

5 Q Now, Mr. Dollman, we talked here about whether or not there were
6 concerns about how much money it would show on Save America's books versus TMAGA.
7 And I'm going to show you an email in a moment that's going to show that it appears that
8 you and others at the campaign have concerns that, when this FEC report came out, there
9 would be more questions as to the disconnect we've been talking about of asking donors
10 to raise money, to donate money to fight the election, but that Save America was
11 spending no money on the election.

12 So, actually, we're going to come back to this email, but I'm going to show you just
13 for context, exhibit 17.

14 A Yes, sir.

15 Q And if we can start in the last page here. This is an email that you're not
16 on, but it's from a Washington Post reporter to Mr. Murtaugh who says, Hi, Tem, I'm
17 doing a story on the Trump operation raising more than \$150 million since the election
18 and am looking at the breakdown of the money and where it goes with the PAC, RNC, et
19 cetera. Can I ask what you plan to spend the money on and what you've spent already.
20 Also, some outside critics say it's unfair to ask small-dollar donors to give so frequently to
21 help the President when a lot of it won't go toward legal expenses. What do you say to
22 those concerns?

23 And if you see up, Mr. Murtaugh writes to Mr. Clark and says, Still ignore.

24 And Mr. Clark adds you, Jason Miller, and Bill Stepien, and he says, I would still say
25 no comment, and I also don't know the number is correct and whether it's something we

1 want to inform if the story is going to get written anyway.

2 And then you respond and you say, and you weigh in here, Agreed, and it's
3 showing that you're engaged on the issue.

4 Mr. Murtaugh says, Agreed what?

5 And you say, Still no comment. There is no upside.

6 So let's start there. Do you recall this conversation?

7 A No, I don't recall this conversation.

8 Q Do you generally recall discussions regarding how to respond to media
9 inquiries about why Save America was taking so much of the fundraising money?

10 A No. I do recall responding to inquiries just based on the fact that we never
11 get positive press; doesn't matter what it is. It doesn't matter if you answer any press
12 report or anything; it's that we never get positive press.

13 Q Now, here -- putting aside those concerns, here, the question as to whether
14 the millions of dollars raised, which we've talked about earlier about -- which you said the
15 majority of which were going to save America, whether that was unfair because they
16 were not going to legal expenses. And you agreed most of the money was going to Save
17 America and not to legal expenses, correct?

18 A I agree that most of the money was going to Save America.

19 Q And not going to the campaign's recount or legal expenses, correct?

20 A It was not going to recount account, correct.

21 Q Okay. So I'm just asking in one sentence. You agree that most of the
22 money being raised was going to Save America and not going to the campaign's recount
23 or legal expenses, correct?

24 A That's correct.

25 Q So here, when the report is asking whether that seems unfair, and you say

1 there's no comment -- to have no comment because there's no upside, did you disagree
2 with the characterization that this would be unfair to ask people to keep donating when
3 the money was going, as we just said, to Save America and not the things like an official
4 election defense fund?

5 A I say there is no upside and then there is not going to be positive press no
6 matter what you tell them.

7 Q Was there anything positive you could've said in response?

8 A I do not know, sir.

9 Q And then in response, Mr. Murtaugh, if we scroll up, he says, I side with no
10 comment. He is going to write about the split, and if we say stuff about legal expenses,
11 it will serve to highlight the argument that the fundraising pitch is misleading.

12 And now here, as Mr. Murtaugh is saying that if you all were to say exactly what
13 we disagreed upon, that the money is not going to legal expenses, that would support the
14 argument that the fundraising messages were misleading, right?

15 A Can you be a little bit more specific on that question? You're saying that all
16 fundraising messages -- I'm sorry.

17 Q No. Sir, I'm not asking about fundraising. We're specifically talking here
18 about the Trump campaign asking donors to support its efforts to challenge the 2020
19 election through donating to things like an official election defense fund but the money
20 instead going to Save America. Here, Mr. Murtaugh agrees with you, and it says, No
21 comment.

22 And he says, If the reporter is going to write about the split, namely, the money
23 going all to Save America, and if we say stuff about legal expenses, it's actually going to
24 highlight the argument, as in make it worse, because then people will believe the
25 fundraising pitch is misleading.

1 So I'm asking you, sir, is this -- did you agree with this, with what Mr. Murtaugh
2 said, that to say the full story as to where the money was going would only support the
3 argument that the fundraising pitch was misleading?

4 A I mean, that's Mr. Murtaugh's opinion on it.

5 Q I understand that, sir. But he agreed with your comment and he wrote you
6 the email, an email chain that you weighed in, as we'll see in a bit, for the launch, so it
7 shows that you were engaged on this email. Clearly, you were reading it. You were
8 responding substantively.

9 So I'm asking you whether you agreed with what he was saying, which is that if
10 you told people what you said was true, which is that the majority of the money was
11 going to Save America, not going to the campaign's legal expenses or recount, that that
12 would only support the argument the fundraising pitches were misleading. Did you
13 agree with what Mr. Murtaugh was saying?

14 A I don't know what the fundraising pitches were, sir.

15 [REDACTED] It says in the email at the bottom, the reporter actually puts in there, I
16 am doing a story on the Trump operation raising more than \$150 million and looking at
17 the breakdown of the money and where it goes with the PAC, RNC, et cetera. Can I ask
18 what you all plan to spend the money on? Some outside critics say it's unfair to ask
19 small-dollar donors to give so frequently when a lot of it won't go toward legal expenses.
20 What do you say to those concerns?

21 [REDACTED] And I will note, Mr. Dollman, just for [REDACTED] benefit,
22 we looked at an email from another reporter just a second ago that also said, quote,
23 Donors are being asked for money to defend election integrity and stop an attempt to
24 steal the election, but in fact the legal disclosure says all the money is being routed to
25 Save America and the RNC.

1 So that's another example of email that you were on and you also reviewed earlier
2 today that shows you what these emails were about.

3 So I'll turn it back to [REDACTED]

4 [REDACTED] No. I was just answering your -- you said, I don't know what the
5 fundraising pitch is. And at a minimum, it's in the email chain that we're reading right
6 now, but to my colleague's point, there were multiple emails about it.

7 Mr. Dollman. Yeah. The pitch is not on this email, but I do understand the
8 question. Again, I didn't write the pitches. They went through legal. What Save
9 America was fundraising for and like the email that you read sort of it said per election
10 integrity, my understanding is Save America was supporting candidates and committees
11 who supported election integrity. So I don't find that to be misleading. But all the
12 fundraising emails that went out, it was my understanding went through legal and went
13 through the process before going out.

14 [REDACTED] Sir, if we could scroll up in this email, I'm going to show
15 you what Mr. Miller responds. And I think that -- if you can weigh in on these
16 discussions.

17 [REDACTED] Top.

18 Okay. Mr. Miller responds, Fair points. Sean, what are the reporting deadlines
19 for these respective entities, 12/15? It will be tougher to dodge such answers after
20 reporters can find it themselves.

21 And then you respond and you say what the reporting deadlines are for the FEC.

22 So here, Mr. Miller, in response to that email about it being misleading, he says it's
23 going to be tougher to dodge such answers. So is it not a fair reading here that the
24 discussions you all are having as to the reporting requirements is the potential blowback
25 that may come?

1 Mr. Dhillon. Can we see the rest of the email? We can only see reporting
2 covering, but we can't see that.

3 [REDACTED] You can't see which part, Mr. Dhillon?

4 Mr. Dhillon. Okay. There we go. Okay. I wanted to see the top of that email
5 chain because we couldn't see that. Thank you. I'm sorry.

6 [REDACTED] Oh, no problem at all.

7 And then you see in response to your question, Mr. Miller says, Welp -- which I
8 think we can agree is, you know, a negative response -- sounds like we have 72 hours to
9 come up with a messaging game plan. Right? Because it is November 30th, and you're
10 saying this is due December 3rd.

11 So is it not fair here what you all are discussing is that how to come up with a way
12 to deal with a potential negative blowback when it comes out that the money being
13 raised is all going to Save America and not going to the campaign's recount or legal
14 expenses? Is that what you're discussing here?

15 Mr. Dollman. I believe that's what the comms team is discussing, yes.

16 [REDACTED] And then if we scroll up here, Mr. Murtaugh says, We
17 should talk tomorrow about whether to announce this press release like we would any
18 other fundraising announcement. If we have the numbers, we can discuss how the
19 breakdown among entities needs to be messaged. Also key, as Jason pointed out, that
20 POTUS is on board with how it will be described.

21 So here -- and we're going to talk about the POTUS meeting, but Mr. Murtaugh
22 is -- he's talking about the President is engaged on this question as to how to deal with
23 presenting the Save America fundraising inconsistency to the American public. Isn't that
24 what that's about?

25 Mr. Dollman. I don't know what his input is on this and how it will be described.

1 [REDACTED] What did you understand it to mean, Mr. Dollman? Sitting here
2 today, you're reading the email, what did you understand him to mean? What did you
3 think when you read it?

4 Mr. Dollman. I don't recall what I thought when I read this.

5

BY [REDACTED]

6 Q But, Mr. Dollman, you just described to us how memorable and seminal it
7 was for you to be called to the White House to come and talk with the President, which
8 we'll get to that email that we just talked about, Mr. Dollman. But is it not fair to say
9 that in preparation for that meeting, that you would've gotten all the background
10 information you could've of what the President was thinking? Did you not have
11 conversations with Mr. Murtaugh about what he meant about this or what Jason Miller
12 meant?

13 A No. That meeting was an overview of the wind-down account, the recount
14 account, and Save America. My call from Jason Miller telling me about the meeting was
15 put a one-page slide together. And I still have no clue what it was I was going to be
16 talking to the President about at that time. And it was the night before he wanted to
17 meet with me.

18 So in my head, it was more on how much did we spend in 2020. I was trying to
19 put together numbers in my head on what was the total spend on certain categories just
20 in case the President asked me about those. When it came to Save America, my
21 involvement was very minimal in the sense of I reported what the raise was to Save
22 America, to the best of my ability.

23 Q But, Mr. Dollman, when you go to that meeting with the President -- and
24 we'll -- if we could turn to exhibit 18, please, which we were earlier, and we're going to go
25 to the bottom of page 2. This email is happening in the context of what we just

1 reviewed, which means, as you agreed to, as you, I think, concurred with our description,
2 that the senior campaign officials were describing how to avoid the potential negative
3 story as to where Save America -- how Save America was getting the money and not
4 recount or legal expenses. And here, you then tell them that Save America had not
5 received a distribution from TMAGA. Cash on hand will look minimal for Save America
6 on this report.

7 Were you not telling them that because that would help potentially blunt some of
8 the negative media response because, on paper, Save America had not gotten all the
9 distributions yet that it was going to get?

10 A No. Again, that was my error of I did not flag with anybody that TMAGA did
11 not distribute to Save America. And by the time that I recognized that, I had to let them
12 know that there was no distribution from TMAGA. Again, it was my error and I should
13 have told someone, but I did not work on Save America so I did not. It was my fault for
14 not flagging it with them to receive the distribution.

15 Q We're going to scroll up on this mail here. And Mr. Miller --

16 [REDACTED] Actually -- sorry.

17 [REDACTED] I'm sorry.

18 BY [REDACTED]

19 Q Really quickly. Mr. Dollman, do you see where it says DJTFP ending cash 18
20 million, that scheduled for this report will be tentatively 18 million? Do you see those
21 bullets?

22 A Yes.

23 Q And you see where it says, including routing event costs? It says AF-1, AF-2
24 costs?

25 A Uh-huh.

1 Q We saw in a previous email that AF-1 was America First Policy Institute. It
2 was a payment for a million dollars. Do you know what AF-2 is? Was there another
3 payment to America First?

4 A Yeah, that's actually Air Force One, and then Air Force Two is the Vice
5 President's plane. So whenever he travels to a rally or anything, we have to reimburse
6 that cost. The problem is, is the travel department within the White House was very
7 slow at sending us the invoices. So at this point in time, I wanted to make sure that we
8 had an understanding of the total outstanding to AF-1 and AF-2 accounts and also travel
9 and carpool -- or not carpool but motorcade, any hotels or anything that was associated
10 with advance personnel. And what that is, is it just says the travel -- it's pretty much the
11 travel cost that's outstanding that we still have not received invoices for but our best
12 estimate on what that outstanding cost would be.

13 Q Okay. So if we see AF-1 or AF-2, your understanding is that's Air Force One
14 or Air Force Two?

15 A That's how I wrote it, yes, ma'am.

16 Q Okay. Thank you.

17 [REDACTED] Sorry. Go ahead.

18 Mr. Dollman. Which by the way, it is really frustrating when you don't have the
19 total cost for things, again, until it's well after the fact.

20 BY [REDACTED]

21 Q Now, Mr. Dollman, here is where it says that schedule, but it has future legal
22 fees. What's the reason why, like, future legal fees would be in a debt schedule? Can
23 you just explain that?

24 A Yeah. So pointing -- so we still had legacy litigation from 2016 that the
25 campaign was paying for and also ends at 2020. The problem is, like, what I came to

1 find out is legal and a legacy legal isn't something that can be handled quickly, that
2 apparently it gets drawn out for an extended period of time. We had our best estimate
3 on what our future legacy legal fees or bills or invoices would be.

4 Q Okay. If we can --

5 A Those are legal cases that happened in 2016 or 2020 that we were still
6 handling.

7 Q Thank you.

8 A Sure.

9 Q All right. If we could scroll up. So here, Mr. Miller sends you an email
10 where he says, Sean, POTUS wants to see you in the Oval tomorrow a.m. to talk him
11 through these fundraising numbers. He wants to see one chart in each of his
12 committees with explanations of where the money is going, what it can be used for, et
13 cetera, support charge total. He also wants to talk through who signs the checks, what
14 the approval process looks like, making sure nobody can rip him off, et cetera. If you
15 need help putting these charts together, let me know. Hope or Molly will reach out to
16 set it up.

17 And here it then indicates that on the press side, that POTUS has approved the
18 statement for us to put out tomorrow with Bill's name, and talks about what time it is put
19 to launch.

20 Is this the reference to the meeting that you talked about with President Trump?

21 A Yes, sir.

22 Q Okay. And the charts that you created, tell us what those charts -- did it
23 end up being four charts total?

24 A No, sir. I believe it was three. So it's a one-page with three columns
25 pretty much. On the top of each column, one was -- I believe it was wind-down/debt or

1 something, the middle one was recount, and then the far right one was Save America.
2 And then inside of it was the dash and then what the spend could be on; certainly what I
3 quoted to you all earlier, debt can only be spent on debt, recount can only be spent on
4 recount.

5 Q Okay. Sorry. So it was -- tell us the three columns again. It was Save
6 America?

7 A The recount account, and then wind-down.

8 Q And wind-down. And when you say -- I'm sorry?

9 A DJTFP.

10 Q Okay.

11 A The 2020 debt retirement account, I guess.

12 Q And when you gave the President those numbers, did you reflect it as to
13 what they would be in the FEC report or as to what you thought they were in fact,
14 meaning, taken to account distributions and whatnot?

15 A Yes. I usually will add in the allocation of the distribution. I don't recall
16 exactly what I put in the column, but given historical, I would probably put in the total
17 allocation. So what would be distributor pending distribution.

18 Q So here, President Trump would have had more accurate numbers than
19 what was in the FEC public filing. Is that fair?

20 A Yes.

21 Q And then by reviewing these charts here, President Trump was aware of
22 what we've talked about repeatedly, which is that the vast majority of the funds being
23 raised were going to Save America PAC, correct?

24 A I don't believe I included any type of fundraising numbers in the charts, so I
25 don't know if he would have the ability to see that the vast majority of fundraising went

1 to Save America.

2 Q But this document would've provided him with insight into the large cash on
3 hand that Save America had raised post-election to that date, correct?

4 A Correct.

5 Q Now, when you went to the Oval Office, you told us -- can you tell us again
6 who was there? It was -- can you tell us the list of people who were in that meeting
7 with you?

8 A It was Jason Miller, myself, Alex Cannon, Jared Kushner, and some other
9 lawyer.

10 Q Was it a lawyer from the campaign or from the White House?

11 A I believe the White House.

12 Q You remember first name or anything of that nature?

13 A No, sir.

14 Q Now, when you went to -- did you provide President Trump with this
15 summary document you talked about?

16 A Yes, sir, I did.

17 Q And he reviewed it?

18 A I don't know the detail of review on it, but he did have it, sir.

19 Q Did he ask you questions about it?

20 A I don't recall asking me questions about the document. So I think he did
21 ask Alex Cannon on the Save America side on what it is used for.

22 Q He asked Alex Cannon to tell him what Save America could spend money on?

23 A Yes, sir.

24 Q And what did Alex Cannon say?

25 A I don't recall, sir.

1 Q Do you recall anything at all that Alex Cannon said in response?

2 A No, sir.

3 Q Did Mr. Miller weigh in in that meeting?

4 A I don't recall, sir.

5 Q Did Mr. Kushner weigh in in that meeting?

6 A I believe Mr. Kushner was the one that introduced me, sir.

7 Q So what did you say in that meeting?

8 A I don't -- like I said before, I don't recall the whole meeting. It was
9 definitely a new thing for me. I remember telling him that I do play golf. And when he
10 asked me if I played golf, I remember telling him that I don't sign the checks, and that is
11 actually Bradley Crate, the treasurer of the campaign. But other than that, I just
12 remember thinking I hope I don't sweat through my jacket, because I was sweating a lot.

13 Q Now, the email from Mr. Miller says the President wants to talk about who
14 signs the checks, and what the approval process looks like, and making sure nobody can
15 rip him off. So tell us a bit about how you all covered those topics with the President.

16 The approval process, did that come up? Let's start there.

17 A I don't recall, sir.

18 Q Well, I'm trying to understand here, Mr. Dollman, because you've expressed
19 that this meeting stands out in your mind very clearly because it was the one time you'd
20 been -- it sounds like the one time you'd been with the President at least post-election in
21 a private setting and your first time in the Oval Office ever. And besides this meeting,
22 have you ever had a private audience with the President?

23 A No, sir.

24 Q Okay. So it's a one time, your first meeting in the Oval Office, but the only
25 substantive thing we've heard from you so far by recollecting is that -- is about golf,

1 because you mentioned golf, I think, three times now. But we haven't heard any -- a
2 single note of substance as to what was discussed in the meeting that had some of the
3 most senior people in the campaign added, including the President of the United States.
4 So --

5 [REDACTED] Well, he did say that -- this is the same meeting where a moment ago
6 you said that he asked Cannon where he could spend Save America PAC money on?

7 [REDACTED] Yeah.

8 Mr. Dollman. Yes, ma'am.

9

BY [REDACTED]

10 Q Okay. You did say one substantive thing. And not that the golf was
11 nonsubstantive, it's just not relevant to what we're saying. But I think to my colleague's
12 point, we've talked to a number of people who don't recall things where we're kind of
13 like, I mean, I'm not asking you what you had for breakfast 4 days ago, I'm asking you
14 about the content of the single -- well, at least, did you meet -- this is the only meeting
15 you had with the President in person?

16 A Where I was asked to attend and discuss, yes, ma'am.

17 Q Yeah. So understanding it's a nerve-racking thing, but sitting here right
18 now, it is hard to imagine that the only thing that you might remember is the golf or the
19 Cannon comment. But I understand it was a while ago, but if you could take a moment,
20 we're not necessarily asking you for every single word by word, but to the extent that you
21 can remember anything that anybody said or the substance of any conversations or the
22 gist, we're just trying to get your best recollection of what seemed like a seemingly
23 memorable event.

24 A Yeah. And I understand you guys' position, and I'm just -- you know, that's
25 why it's kind of embarrassing that I don't remember everything because I wish I did. It

1 was a very big moment of going into the Oval and sitting in front of the President. And it
2 was definitely a big, big moment in my life. So not knowing everything that, you know,
3 was discussed in that meeting is -- I can't recall a lot of that meeting.

4 Q Do you recall the --

5 A Like, I don't remember leaving, I don't remember walking back to my car. I
6 don't remember a lot of it.

7 Q Yeah. A moment ago you said you remembered Mr. Trump asking Mr.
8 Cannon how the funds in Save America could be spent?

9 A Yes.

10 Q Do you remember any discussions, presumably, about the different funds
11 and how the money was organized? I'm assuming that was your presentation to the
12 President, correct, the this is the --

13 A Yeah.

14 Q -- this is the campaign or wind-down account, this is legal recount, this is
15 Save America. Do you remember your own presentation to him?

16 A When I said I don't know if he reviewed the document, he picked it up,
17 looked at it, and he didn't ask me much about the document itself, I don't believe. And
18 the only thing he asked me was if I signed the checks.

19 Q If you signed the checks?

20 A Yes, ma'am.

21 Q Did he ask you any questions about -- well, let me ask you this. What was
22 the -- when he asked you are you the one that signed the checks, what do you think he
23 meant by that, like, in the sense of why was we asking you that?

24 A I don't know if I was the one that was a sign-off on the final payment of stuff.

25 Q Well, the reason I ask is because if you think back to that email, there's

1 actually a line -- I think it was exhibit 18.

2 A Eighteen.

3 Q Yeah. There's actually a line where Mr. Miller says he also wants to talk
4 through who signs the checks, what the approval process looks like, making sure nobody
5 can rip him off, et cetera. Now, it is pretty widely reported that one of the reasons that
6 Mr. Parscale got into issues with -- when he was campaign manager, was that there were
7 some concerns about him being campaign manager and also a vendor and him paying
8 himself, and to your point earlier, how much was being spent.

9 Was there any of that discussion in the meeting? Because it clearly sounds like
10 from the email he wants to talk to who signs the checks, what the approval process looks
11 like, and making sure nobody can rip him off. So when he asked you, are you the one
12 who signs the checks, was there any discussion with you with and how are you approving
13 that, who are you cutting checks to, who's getting my money?

14 A No. No, ma'am, I don't recall that side of it. I know after the meeting,
15 there was a -- someone -- I forgotten who it was -- it might have been Jason Miller or
16 Alex -- about the President wanting to approve spend moving forward, per the
17 conversation in the Oval, but I don't remember him saying it in the Oval Office.

18 Q Okay.

19 BY [REDACTED]

20 Q Do you recall the President expressing any thoughts about the success of
21 fundraising in that meeting with you?

22 A No, sir.

23 Q Do you recall him expressing any thoughts regarding the amount of money
24 being spent, whether it being too high, too low, or just right?

25 A No, sir, I don't recall that.

1

2 [1:51 p.m.]

3

BY [REDACTED]

4

Q Did Mr. Trump express any thoughts that you were the wrong person for that meeting, that you weren't answering the questions that he wanted answered?

5

6

A I really don't recall a lot of that meeting, and I don't believe I was engaged in a lot of the conversation.

7

8

Q Is that because you were watching others in a room have the conversation?

9

A The questions weren't directed towards me.

10

Q So, besides the question to Mr. Cannon and Mr. Kushner introducing you, do you remember the President addressing anyone else in the room?

11

12

A Yes. He asked Mr. Kushner about setting up the Presidential library and asked if Melania could run it.

13

14

BY [REDACTED]

15

Q Was there a discussion about how the funding of that would work?

16

A I don't -- I don't recall.

17

18

Q Sitting here right now, do you actually know whether a campaign account can fund a Presidential library?

19

20

A Oh, I don't know. I don't -- I mean, if you're raising towards debt, a library is not debt. So I wouldn't think that a campaign could -- I don't think a recount can, because it's not recount-related. Those two, I don't.

21

22

Q Okay. So, sitting here right now, that's the basis of your understanding, is if it's not debt, if it's not a recount, then a library probably couldn't be paid for out of that?

23

24

A That's correct.

25

Q Okay.

1

BY [REDACTED]

2

Q Just very quickly, I'm going to show you, Mr. Dollman, exhibit 18 again.

3

And --

4

BY [REDACTED]

5

Q Oh, actually -- sorry, real quick, in that meeting -- it seems in the email from

6

Mr. Miller that part of the -- if you take all the emails as a whole -- Mr. Murtaugh's email,

7

like, we need to get POTUS's input; Mr. Miller's email -- it seemed like basically what was

8

happening was, you know, the numbers are out, or they're about to come out the next

9

day, and what you're trying to do is basically message, right, to Murtaugh's point

10

earlier -- what -- right.

11

So, literally, Mr. Miller writes in an email, "I'm going to meet with Dollman at the

12

office in an hour or two to tighten up the exact game plan." And then you meet the next

13

morning and talk with the President.

14

So, in terms of not remembering the conversation, I thought maybe it might jog

15

your memory, because it seems clear that part of the mission was to go over there and

16

get a game plan of how to message the funds raised between Save America, the

17

campaign. Like, what were they going to put out in response to all these reporters?

18

And it sounds like, from Mr. Miller's email, that the President loved the amount

19

raised; he loved the fact that he had raised so much money post-election that he was still

20

driving, right -- like, I think if you look at the little blurb that they want to put out, "He

21

remains the leader and source of energy for the Republican Party, and his supporters are

22

dedicated to fighting for the rightful legal outcome of the 2020 election." Like, you're

23

still tying it to that.

24

Do you remember any discussions, talking with the President, about how to

25

message raising money for Save America versus the campaign versus legal recount?

1 Like, the whole point of that meeting was to go get the President's buy-in: How
2 do we message when the December 3rd finances come out and we've raised over
3 \$100 million to a leadership PAC and not an official election defense fund?

4 You don't remember anything like that being discussed, when that was kind of the
5 purpose of that meeting?

6 A My understanding of the purpose of that meeting was to explain the three
7 accounts to the President. And so I did not understand the purpose of that meeting, for
8 myself, to be messaging.

9

BY [REDACTED]

10 Q Well, but you understood that the President -- I mean, we looked at an email
11 earlier, Mr. Dollman, exhibit 17, that said that "POTUS is on board with how it will be
12 described." And that's a December 1st email.

13 So, when you were having these discussions about a game plan, as indicated here,
14 President Trump -- you understood him to have weighed in and provided some input to
15 this senior campaign staffer, even if it wasn't to you directly, correct?

16 A On a press release for FEC fundraising, that would've been the message I
17 guess.

18 Q Well, the email that I'm referencing is not -- the email that I'm referencing,
19 sir, is not with regard to a press release. And we can look at it again. It's exhibit 17.
20 If we could scroll up to the top of the page.

21 It's an email we discuss, where Mr. Miller says, "Welp, sounds like we have
22 72 hours to come up with a messaging game plan." And then Mr. Murtaugh says, "We'll
23 talk about whether to announce it by press release." But he says, "Also key, as Jason
24 pointed out, that POTUS is on board with how it will be described."

25 And all these emails are happening around the same time, December 1st. And I

1 think you meet with the President December 2nd or 3rd.

2 So is it not accurate that you had the understanding that the President had
3 weighed in on this game plan that you and other senior campaign officials were discussing
4 as to how to message the fundraising numbers and the fact that Save America is taking on
5 so much of the fundraising?

6 A I mean, that's something you would probably have to talk to Tim Murtaugh
7 or Jason Miller about. I'm not a part of messaging for fundraising. If someone's going
8 to ask me about it, it's going to be about dollar amounts that were raised or what the
9 accounts look like for the FEC report.

10 Q Did you have any discussions with anyone about President Trump weighing
11 in on how the fundraising would be described?

12 A I do not recall a conversation about POTUS weighing in.

13 [Discussion off the record.]

14 [REDACTED] All right. Mr. Dollman --

15 Mr. Dhillon. One sec. Just wanted to jump in on one thing. We're at 2 o'clock
16 now. You were mentioning 3:00. One of the reasons I want to just talk about time is
17 that Mr. Dollman does have a flight that he's scheduled to leave on tonight around 5:30
18 or 5:40. We think we're going to be able to make it, but if for some reason you think
19 we're going to go much past 3:00, could you just give us a warning so that if he needs to
20 reschedule that flight he can?

21 Our hope, of course, is that he can make it, and that's why he scheduled it for that
22 time. But I just wanted to alert you to that, because I'll be kind of watching the clock if
23 that becomes an issue.

24 [REDACTED] All right. Well, let's keep pushing. We'll do our best,
25 but I think as I noted, we asked for the day to be fully open. But we're pushing ahead

1 well, and that's why we're pivoting to a new topic now, so we're going to keep moving.
2 Let's touch base in 30 minutes and see where we are.

3 Mr. Dhillon. Okay. Good.

4 Mr. Dollman. Can we take a quick bathroom break real fast, sir?

5 [REDACTED] Yes, sir. No problem. Let's take just -- I'm sorry?

6 Mr. Dhillon. 2:05. We'll come back at 2:05.

7 [REDACTED] Yeah, 2:05. Thank you.

8 [Recess.]

9 [REDACTED] So we'll go back on the record at 2:09 p.m.

10 So we're trying to be efficient with the time, understanding you have a flight. So
11 if it seems like we're jumping around, it's just because we're kind of trying to, like, hit
12 some questions, get in, get out, and get some answers.

13

BY [REDACTED]

14 Q So I did have a question regarding, I understand you left in February 2022
15 from the campaign. Is that right?

16 A Yes, ma'am.

17 Q So who was left working with you on the campaign as of that time?

18 A Kalina McDaniel.

19 Q So, if invoices came in -- were submitted for payment, what's the approval
20 process there in terms of who's determining whether it gets paid or not?

21 A So Kalina McDaniel would handle the invoice going to -- I mean, now
22 it's -- anything wind-down-related, it would go to -- there was actually not a whole lot, I
23 don't think, coming in wind-down-related when I left. So it would be legacy/legal issues,
24 and that would go to Justin Clark or Alex Cannon for a review on if it was pertaining to
25 legacy/legal.

1 [REDACTED] Mr. Dollman, just one second.

2 Is it fuzzy for anyone else?

3 [REDACTED] Yes.

4 [REDACTED] Okay. Sorry. The camera is a little fuzzy for you, and I thought it
5 was maybe my eyes.

6 Mr. Dollman. Oh, is it?

7 [REDACTED] Yeah, so maybe if you could just -- if you have the ability
8 to kind of zoom in and out a bit, just to try to focus it.

9 Mr. Dhillon. Oh, it's not focused.

10 [REDACTED] Yeah, it's out of focus.

11 Mr. Dhillon. Zoom out.

12 Mr. Dollman. Now it's our turn.

13 [REDACTED] Oh, there you go. That's good.

14 [REDACTED] There we go. Okay. Apologies. I thought my eyes were blurring,
15 and I was panicking for a moment, so that's reassuring.

16

BY [REDACTED]

17 Q A moment ago, you said you didn't think that there were many wind-down
18 expenses coming in other than legacy/legal.

19 I wanted to ask if you're familiar with a company called 2M Document
20 Management and Imaging, LLC.

21 A Yes, ma'am.

22 Q And do you know an individual who's affiliated with that company?

23 A Yes. I think his name is Matt.

24 Q Matt --

25 A Matt Clarke, I think? Matt Clarke?

1 Q And how did you become familiar with that company?

2 A I believe that they had, like, a -- so we had Deloitte running, I believe, the
3 document retention, or something, in 2016. So a lot of the legacy/legal issues or
4 anything, all of it was with Deloitte. Deloitte was very expensive. And then I don't
5 know how the decision was made, but 2M replaced Deloitte.

6 Q Do you know, does Matt Clarke have any relationship to Justin Clark?

7 A Not that I'm aware of.

8 Q Do you know how 2M came to be selected? Was there a bidding process?
9 Or how did they win that contract?

10 A I do not know, ma'am.

11 Q Do you know where they're located?

12 A No, ma'am.

13 Q Do you know anything about them? Do you know if anybody did any
14 vetting?

15 A No, ma'am, I don't.

16 Q And what is your understanding of what exactly they do for -- I guess I'll call
17 it MAGA PAC now since that's, I believe, who's the entity paying them. But what do they
18 do for MAGA PAC?

19 A I believe it's the same thing Deloitte did, but, like, document retention.

20 Q So give me an example. What does that mean? When do you contact 2M
21 Document Management? What services are you contacting them for?

22 A I don't contact 2M. I mean, we've received the invoices for them. If there
23 was some type of legal document production or something, it would go through 2M.

24 Q Has anyone other than you been processing payments for MAGA PAC prior
25 to February 2022?

1 A You mean, like, reviewing invoices?

2 Q Yes.

3 A So most of MAGA PAC's invoices would either be on a -- like, the invoices
4 would be on a contractual because they are continuing with the treasury/compliance side
5 of it. 2M would be a review from Justin Clark and Alex Cannon. And then any other,
6 like, legal issues would be Justin Clark and Alex Cannon.

7 Q Okay.

8 And are you aware that 2M Document Management has received more than
9 \$2.7 million from over 16 payments from MAGA PAC? This is since, I believe, March 30,
10 2021.

11 A If it's reported, then they received payments from MAGA PAC. I do know, if
12 it was Deloitte, it'd probably be, like, \$5 million or \$6 million. Deloitte was very
13 expensive.

14 Q And so I just want to make sure I understand. This company, it's received
15 quite a bit of money from MAGA PAC. And it's being described in FEC filings as "recount:
16 research consulting." What is the recount work that 2M Document Management is
17 doing?

18 A I do not know, ma'am. That's something you would have to ask Justin Clark
19 or Alex Cannon.

20 Q And are you aware that they were incorporated March 24, 2021? They
21 didn't exist prior to a month after -- no, excuse me -- March 24, 2021, so about 2 months
22 after January 6th, several months after the election. This company didn't exist prior to
23 March 24, 2021. Did you know that?

24 A No, ma'am.

25 Q Okay.

1 And I just wanted to make sure, you said the individual that you know to be
2 associated with it is Matt Clarke?

3 A Yeah, to receive -- we received the invoices from.

4 Q And when you received the invoices, is it via email?

5 A Yes.

6 Q Is it an email address that you are aware of? Like, are you able to
7 remember what the email address is?

8 A Yes.

9 Q Can you tell us what the email address is?

10 A The AP, as in alpha papa, @DonaldTrump.com.

11 Q I'm sorry?

12 A AP. AP, as in alpha papa. It's --

13 Q But you're saying the email address is alpha papa at Donald --

14 [REDACTED] No, no. He's saying the letter A-P. He's saying the
15 letters.

16 Mr. Dhillon. I think they're trying to get the email address to 2M.

17 Mr. Dollman. Oh, 2M.

18 BY [REDACTED]

19 Q Yes.

20 A No, I don't. I don't. Oh, okay. I apologize. I thought you meant where
21 they sent invoices to.

22 Q Oh. No. That makes more sense. Okay. The email address that
23 they're sending it to is alpha papa @DonaldTrump.com?

24 A Yes.

25 Q But do you know the email address that it's coming from? Do you know

1 Mr. Clarke's email -- Matt Clarke's email address?

2 A I do not recall it, no, ma'am.

3 Q Is that something that you would be able to provide us with after the
4 interview?

5 A His email address?

6 Q Uh-huh.

7 A Yeah, I don't see why not.

8 Q I mean, I'm assuming you still have access or may have something that may
9 still have his email address on it.

10 A I don't know the agreement or if there is an agreement with MAGA PAC, and
11 it would be something that I'd probably have to run by MAGA PAC prior to producing to
12 you, but --

13 Q Okay. We can revisit that later.

14 BY [REDACTED]

15 Q Now, Mr. Dollman, just to be clear, when you received this invoice from 2M
16 Management, how would you confirm that it should be approved? You would've gone
17 to Justin Clark for that?

18 A And Alex Cannon, sir.

19 Q And so do you -- is it accurate that they -- let me ask you this way: Do you
20 know which one of them or whether both of them approved payment to 2M Document
21 Management?

22 A Normally on a legal issue, we -- and Kalina has been around in this, the
23 approval side of it, and she would normally not push it through unless the both of them
24 approved or if one of them said, "I spoke with Alex, and this is approved." So, at some
25 point, both of them.

1

BY [REDACTED]

2

Q And remind me, Kalina's title?

3

A She was just an assistant in treasury, in compliance.

4

Q For the campaign?

5

A Yes, ma'am.

6

Q Okay. But you're the CFO, aren't you?

7

A Yes, ma'am.

8

Q So would you --

9

A Well, not anymore. I mean, I was.

10

Q The relationship with you and her was -- did you supervise her? Was she

11

under you? Or how did that work?

12

A Yes, ma'am. I supervised her.

13

Q So she would approve things for you?

14

A No. It would be pushed through her process and through treasury and

15

compliance.

16

Q Oh. So you would assume that she would check with Clark and Cannon,

17

and she wouldn't push it to you to be paid until it had been approved by those two if it

18

was legal?

19

A That's correct. She can click a button that says "approve," but she wouldn't

20

click it until she had an approval.

21

And that's why I was saying earlier, my job as a comptroller is more of the logistics

22

side of invoices and is it approved. And a lot of it became, do I have these approval

23

levels from individuals?

24

And that's what Kalina does right now. She receives the approval level and then

25

pushes it through, through treasury and compliance, for payment.

1 Q Who decides whether those payments are tagged "recount: research
2 consulting"?

3 A The payment to 2M would be based on whatever 2M was billing for. So, if
4 it involved a recount-related expense, then it would be tagged as "recount."

5 Q What I mean by that is, who actually puts the tag on there? Like, who
6 decides this is, for FEC filing purposes, "recount: research consulting" or "research
7 consulting"?

8 A Oh, so it'd be -- the entity, you're saying, that files the FEC report with the
9 description --

10 Q Yeah.

11 A -- is Red Curve.

12 Q So you submit it for payment, it goes to Red Curve, and Red Curve says this
13 expense, for the purposes of FEC filings, is "recount: research consulting"?

14 A Yes. I mean, most of the time, there would be some background on other
15 things, so, like, other invoices, and it would be -- it'd ask for clarification on what the
16 description should be for the FEC filing.

17 Q Okay. Have you had --

18 A And I don't know -- I don't know how that came about as "recount research"
19 or whatever. I don't know how that determination on the description would be.

20 Q Yeah, because you can imagine how odd it is to be seeing "recount: research
21 consulting" a year after an election is over, right?

22 A Yes. I mean, is -- it really depends on what the expense is for.

23 Q Like, what's an example of an expense?

24 A Is the January 6th Committee a recount-related expense? And if the
25 documents that -- or the research that 2M is providing relates to the January 6th

1 Committee, then is it recount-related?

2 Q So the work that 2M Document Management is doing is related to the
3 January 6th Committee?

4 A I'm just saying in general, like, you can still have recount-related expenses.
5 Now, it would have to go through approval from legal and everybody to have the ability
6 to label something "recount," but you can still have recount-related expenses.

7 Q So you're saying that if 2M Document Management is doing legal work in
8 relation to the January 6th Committee it could be submitted and qualify as "recount:
9 research consulting"?

10 A If legal approved it. I'm not the one, you know, putting that description on
11 it. We would need legal approval.

12 Q But, I guess, something seems to give you the impression -- and it sounds like
13 maybe you had a conversation or -- something gave you the impression that something
14 that 2M Document Management is doing has something to do with the January 6th
15 Committee?

16 A I'm trying to think of the invoices that they submit. And I don't really recall
17 all of them, but I would think that there probably is some.

18 Q So it's your understanding that there may be invoices that 2M Document
19 Management submitted, possibly, if I was understanding you, for legal-related work, that
20 on the invoice gave you the impression that it was related to the January 6th Committee's
21 work.

22 A "The January 6th Committee's work." Um, yes.

23 Q And do you remember having any conversations with anyone? Or is the
24 reason that you think those payments -- that some of those invoices were related to
25 January 6th is because you saw on the invoices something that referred to the

1 January 6th Committee? Or did you ever have any conversations with Matt Clarke or
2 anyone else that also gave you that impression?

3 A If I asked Justin Clark or Alex, are these recount-related, would be a
4 recount-related expense. So I don't -- like I said, I don't label it as recount-related, but
5 your question earlier was, does recount-related expenses tie to January 6th? And I think
6 that a recount expense could be classified as recount if it was with January 6th because it
7 involves recount.

8 Q Okay. I want to be very clear, because I feel like it just got a little muddy
9 here.

10 I was asking you, what kind of expenses could be recount so long after an
11 election? I was not asking you anything about the January 6th Committee until you
12 said -- and I want to be very clear about this -- that you saw invoices from 2M Document
13 Management that referenced the January 6th Committee, and so you believed that legal
14 work that 2M Document Management was doing or some work that they were invoicing
15 you that referenced the January 6th Committee could qualify as "recount: research
16 consulting," and it would go through legal, your legal department.

17 But I want to be clear that you said that you saw something on an invoice that
18 referenced the January 6th Committee. Am I right?

19 A No, I said -- you asked, what could be recount-related this far after an
20 election and the recount was over. I said, something like a January 6th Committee. I
21 don't believe I said I saw it within 2M's documents.

22 Q No, I asked --

23 [Crosstalk.]

24 A -- with 2M --

25 Q I asked you, like, four questions on that. So there's a huge disconnect

1 there. So I want to make sure that we didn't misunderstand you.

2 What makes you think --

3 A Yes, ma'am.

4 Q -- that anything that 2M Document Management is doing has anything to do
5 with the January 6th Committee?

6 A So I must have misspoke earlier. I understood the question being, what
7 type of recount expense could be labeled as recount this far after an election? And I
8 said, I would think that something like the January 6th Committee or deals with the
9 January 6th Committee could be considered recount.

10 I don't have anything within a 2M document that specifically says anything J6.

11 I usually, with 2M, send it over to Alex and Justin for their review -- Kalina does
12 now -- and they review it and let me know.

13 Q Okay. Thank you, because that's a really important distinction.

14 So, when you say you believe that things related to the January 6th Committee
15 might count as recount expenses, what would make you think that, or who gave you that
16 impression?

17 A I don't know. If it's recount-related, I just -- it would literally have to go
18 through legal to be labeled as "recount," a recount expense. And I don't make that
19 determination on whether it is or isn't. But it is my understanding that if it is
20 January-6th-related it could be labeled as "recount."

21 Q And who gave you that understanding --

22 A But I don't recall -- I don't recall who gave me that information.

23 Q Well, in all fairness, it sounds like you're really only talking to three people
24 prior to February 2022 -- Kalina, Justin Clark, and Alex Cannon.

25 And you've said multiple times that you don't really do the FEC stuff; you're the

1 invoice guy.

2 So, for you to have an understanding that the work related to the January 6th
3 Committee could qualify as a recount expense suggests that either Mr. Clark or
4 Mr. Cannon -- because it's unlikely that it's Kalina -- gave you the impression that
5 January-6th-Committee-related work could be attributed to recount expenses.

6 A And I don't recall which one of them told me.

7 Q But it was one of those two gentlemen who gave you the -- who said to you
8 that January 6th Committee work could be qualified as recount expenses?

9 A I don't recall who would've told me that, no, ma'am.

10 Q Is there anyone other than one of those two gentlemen that you think you
11 would've had that conversation with who would've ever stated that to you? Because it
12 seems fair to say that the universe has narrowed down to two people who were likely to
13 tell you that January 6th Committee work could be billed as recount expenses.

14 Mr. Dhillon. So I'm going to jump in here because I think there's some confusion.

15 Let me just propose that I think Mr. Dollman was saying that as an example,
16 because you were asking the question about whether at any point or last year, when he
17 was working on the -- when he was still employed, if there was an expense that late after
18 the election that could still be recall --

19 Mr. Dollman. Recount.

20 Mr. Dhillon. -- or recount. I'm sorry.

21 And he, I believe, said, well, yes, today you could do that if you were to say it was
22 the January 6th Committee.

23 So I think he was using that as an example.

24 [REDACTED] Oh, 100 -- no, no, 100 percent. We clarified that he was using the
25 January 6th Committee as an example. And my question was, that example does not

1 come out of thin air for somebody who doesn't do FEC work, who processes invoices.
2 Where did that example come from?

3 And it sounded like it came from either Justin Clark or Alex Cannon saying
4 something that gave Mr. Dollman the impression that work related to the January 6th
5 Committee could qualify as a recount expense.

6 And that's what I was getting at, was, it sounded like he got that example from
7 either Mr. Clark or Mr. Cannon.

8 Mr. Dhillon. So your question is, when Mr. Dollman was still working for the
9 campaign, did any of those individuals tell him to bill -- or to label these particular voices
10 as recount invoices because they were related to the January 6th Committee. Is that
11 your question?

12 [REDACTED] I wasn't -- he had given me the impression that he was not the person
13 who labeled them --

14 Mr. Dhillon. Right.

15 [REDACTED] -- so I was not asking him that, because I --

16 Mr. Dhillon. Okay.

17 [REDACTED] -- didn't believe he was the one who labeled them with the FEC tag.

18 What I was saying was, when he gave that example, that clearly came from
19 somewhere, because I don't think he was just guessing or speculating.

20 Mr. Dhillon. Okay.

21 [REDACTED] So what I was getting at was, presumably some conversation with
22 Alex Cannon or Justin Clark gave him the impression that an example of a recount
23 expense this far after the election would be work related to the January 6th Committee.

24 Mr. Dhillon. All right. So might I just suggest that -- so the question -- let me try
25 it again.

1 The question, Sean, I think, is: When you were working for the campaign, did
2 any of those individuals -- actually, let me do it this way. Did anybody ever tell you that
3 you could label or should label or saw these things labeled as related to the January 6th
4 Committee?

5 [REDACTED] As long as Mr. Dollman understands what we're getting at. That's
6 my biggest concern.

7 Mr. Dhillon. That's my concern also.

8 Mr. Dollman. So my worry here -- and because I don't recall who told me -- is, I
9 don't know the timeframe of when someone would've told me that. Because if it was
10 when the January 6th Committee started, I don't know if Alex Cannon and Justin Clark
11 would've been the only two I would've reached out to or if it would've been outside
12 counsel or the committee itself for that information.

13 So that's my worry right now, is I don't want to say it was either one of those two
14 if I don't know when I received that information and who it was that I would've reached
15 out to.

16 Mr. Dhillon. Okay. So, just for clarification, the timeframe, the January 6th
17 Committee -- I apologize for not knowing the answer to this -- but it came into existence
18 relatively -- some point in early 2021, right?

19 [REDACTED] July. March?

20 [REDACTED] No, the committee.

21 [REDACTED] Yeah, I believe the committee was in July. I think the resolution --

22 [REDACTED] The resolution was July.

23 [REDACTED] -- was July. Yes.

24 Mr. Dhillon. Okay.

25 [REDACTED] So it would've been July 2021, so almost a year ago and, obviously,

1 you know, several months after the election.

2 Mr. Dhillon. Okay. I guess there was a lot of talk about it initially and that sort
3 of thing. Okay. I just -- I couldn't recall that.

4 [REDACTED] No, I --

5 Mr. Dollman. And that's what I mean. And, like -- I apologize for stepping on
6 your toes on that one. But if the committee was already starting to be formed or if
7 there was talk of it, it could've been something that was discussed. And I just -- I don't
8 recall in that who --

9 [REDACTED] Yeah.

10 Mr. Dhillon. Let me just add, Mr. Dollman, when did you stop working for the
11 campaign or altogether for the MAGA PAC and that sort of thing?

12 Mr. Dollman. It was February this year.

13 Mr. Dhillon. So that would've been -- from July to February is the timeframe
14 where somebody could've mentioned it to you. Is that right?

15 Mr. Dollman. No, it could've been prior to July because of the
16 committee -- there was discussion of the committee being formed, right? And I don't
17 know when that discussion started of the January 6th Committee.

18 And I know -- and here's another, like, clarification for you guys. Like, I have a
19 terrible memory. I know I have a terrible memory, and I apologize for it, because I'd like
20 to be a little bit more helpful to streamline this entire process. Then I probably would've
21 been out of here already, so I'm really hurting myself.

22 But, like I already told you guys, I was in the Army, [REDACTED] I [REDACTED]
23 [REDACTED] I've had, like, [REDACTED] So [REDACTED] But I
24 just want to let you know, I'm not doing it on purpose. I'm just --

25 [REDACTED] Oh, no. We --

1 Mr. Dollman. I know it will benefit me if I, like, you know --

2 [REDACTED] Yeah.

3 Mr. Dollman. -- knew this stuff and could tell you. I just want to --

4 [REDACTED] We totally understand.

5 Mr. Dollman. -- be a little bit more helpful, and I just can't.

6 [REDACTED] No, listen, we totally understand, Mr. Dollman. And I do appreciate
7 you recognizing the time, because I think you know we're trying to move as quickly as
8 possible. If we can't get this done by 3:00 p.m. and you have to move your flight, please
9 know that it's not for lack of trying to make it faster.

10 We appreciate your honesty. And, truthfully, even if it inconveniences you a
11 little bit, it is really important that we get this right, that there's not a misunderstanding.
12 We don't want to accidentally put words in your mouth and then walk away with a
13 misunderstanding of the facts.

14 So I would much rather -- I know it's selfish, but I would much rather you have to
15 bump your flight and us get it correct and not misunderstand you than race through it
16 and accidentally misunderstand. Because, a moment ago, we were really talking at
17 cross-purposes.

18 And I think I understand now. The only thing I was getting at, understanding
19 your memory was bad, was, when you gave the example of a recount expense that could
20 be so far after the election, when you said "work related to the January 6th Committee,"
21 that came from somewhere, and I was just trying to figure out where it came from.

22 And, now, understanding the timeframe, is it fair to say that it came from
23 somebody who was working either at the Trump campaign or for the Trump campaign,
24 possibly outside counsel, but somebody working at or for the Trump campaign, gave you
25 the impression that January-6th-Committee-related expenses could count as recount

1 expenses?

2 Mr. Dollman. Yes, ma'am. I didn't make it up. I usually took advice from
3 people.

4 [REDACTED] And that -- and I -- and that's very fair. Okay.

5 [REDACTED] Are you aware of expenses that were, in fact,
6 improved -- that were approved for payment that were related to January 6th and
7 considered recount?

8 Mr. Dollman. I don't recall any off the top of my head.

9 [REDACTED] All right, Mr. Dollman, I want to briefly talk about AMMC,
10 American --

11 [REDACTED] Sorry, Mr. Dollman. One second.

12 Mr. Dollman. Yes.

13 [REDACTED] Can you hit "mute" for a second?

14 [Discussion off the record.]

15 BY [REDACTED]

16 Q Okay. Mr. Dollman, before we go to AMMC, let's talk about, are you
17 familiar with Red State Partners?

18 A Sounds familiar. I don't -- I can't think of what they do.

19 Q Does it sound like -- when you say it sounds familiar, does it sound like an
20 entity that was paid by MAGA PAC?

21 A I feel like there was a lot of Red-somethings that are paid in Republican
22 politics, whether it's Red Spark, Red-something-else, Red Curve. So it sounds familiar; I
23 just -- I can't think of it right now.

24 BY [REDACTED]

25 Q Mr. Dollman, do you know an individual named Nick Luna?

1 A Yes, ma'am.

2 Q And how well do you know Mr. Luna?

3 A Just an acquaintance.

4 Q Are you aware that he's associated with a company called Red State
5 Partners?

6 A I don't recall, but if I had the contract or something from him, I'd be able to.

7 Q So, since April 21, 2021, Red State Partners has been paid \$170,000, first
8 from MAGA PAC and then Save America starting in February 2022.

9 Who would've approved those invoices when they were submitted?

10 A Susie Wiles.

11 Q I'm sorry?

12 A Susie Wiles.

13 Q Who is Ms. Wiles?

14 A She is a senior advisor to Save America. I don't think -- I don't know what
15 her official title is, but --

16 Q Why would Ms. --

17 A -- she's the one that approves.

18 Q Why would Ms. Wiles, a senior advisor to Save America, be approving
19 invoices submitted to MAGA PAC?

20 A At what point was it paid out of MAGA PAC?

21 Q It was always paid out of MAGA PAC, starting in April 2021. It didn't change
22 into Save America until February 2022, probably around the time that you left. So, while
23 you were at MAGA PAC, they would've made -- I'm not sure exactly how many payments,
24 but all of the payments would've come since April 21, 2021.

25 A I -- I do not know.

1 Q Well, I guess my question is: It's a non-legal expense. Who would be
2 approving that invoice for MAGA PAC?

3 A MAGA PAC -- so Donald J. Trump for President converted into a
4 multi-candidate PAC called MAGA PAC. But I don't -- I'm not too sure here, but I don't
5 think that MAGA PAC is restricted to only paying legal invoices.

6 Q Oh, probably not. We're just trying to figure out who reviewed and
7 approved the invoices to Red State Partners. Like, if that was you, did you know that it
8 was associated with Mr. Luna, that that appears to be his LLC?

9 A So, I mean, like, I hate to say this a bunch of times, but any time I paid for
10 something, it was approved by someone else or some type of contract. I do not recall
11 where the contract came from and who requested the hiring of Nick Luna.

12 Q So you said "the hiring of Nick Luna," which suggests that you knew that he
13 had been hired by MAGA PAC?

14 A If he was paid out of MAGA PAC, I would think that -- and it was Red State
15 Partners, that it would be a contractual agreement somewhere.

16 Q Well, here's the interesting thing: Mr. Luna actually gets his salary, and
17 then Red State Partners also gets paid.

18 Is that a normal thing, for individuals to be paid salaries and then their LLCs to also
19 be paid contractual funds on top of that?

20 A Was he paid out of MAGA PAC as an individual and as a -- as salary through a
21 1099? Or was he under Save America individual and then 1099 through MAGA PAC?

22 Q I think he was --

23 A Because then that would be --

24 Q I think the latter. I think he was paid individually Save America and then
25 the LLC was paid through MAGA PAC. Does that make sense? Does that correlate to

1 your understanding?

2 A I mean, it sounds like something that could be done if he was billing through
3 an individual to Save America and then as an entity through MAGA PAC.

4 Q Why does that make sense? Can you explain that to us? If he's working
5 for the PAC and he gets a salary, why would his LLC also be billing MAGA?

6 A I don't know his current -- or his situation in that case. But in the fact that
7 it would make sense is if he needed health insurance and Save America provided health
8 insurance and being hired as an employee to receive health benefits, and then his entity
9 being hired as MAGA PAC. Because if he's hired as 1099 through Save America, he
10 wouldn't be able to receive the health benefits -- or the health insurance.

11 Q Okay. So your theory is that, when individuals are individually paid payroll
12 and then their entities are paid by another entity, it's for health insurance purposes?

13 A No. I was saying that that could be the case. I don't know what his
14 situation is or what it was. Well, that, in my head, would be the way it made sense --

15 Q Okay.

16 A -- on why there would be an individual payment and then an entity payment.

17 Q Okay.

18 BY [REDACTED]

19 Q All right, Mr. Dollman. Let's talk about American Made Media Consultants,
20 AMMC. What is AMMC?

21 A AMMC was the company used to place media buys for the campaign.

22 Q Okay. And is it correct that you were the CEO of AMMC?

23 A Yes, sir.

24 Q And also correct that you were the owner of AMMC, to the extent there's a
25 difference there?

1 A Yes, sir.

2 Q And tell us about how AMMC was created.

3 A So it was 2018 and the -- then, I believe it was Brad Parscale was kind of the
4 acting campaign manager. And in 2016 Brad Parscale was the, like, digital buyer, right,
5 of 2016.

6 He did not want to be that role and the campaign manager, and the campaign was
7 looking for a new vendor to be able to provide the services for media buying. And they
8 worked with outside counsel at Jones Day to discuss options.

9 One of them, the counsel being Ben Ginsberg, ran the -- and created American
10 Rambler. And American Rambler was Mitt Romney's, essentially, AMMC, so it did all the
11 media buying for Mitt Romney. And he worked with Brad Parscale on being able to set
12 up AMMC. And I was asked by Brad Parscale to run it.

13 Q Okay. And by running it, what did you do?

14 A So I managed the relationship between the campaign and the media buyers,
15 whether it was digital or TV. I worked with the teams on budgeting and making sure
16 that they were staying within budget.

17 I worked on TV with -- Claire Murphy-Cook I hired to help placements. I didn't
18 understand TV as much, and she understood, I believe it's, DMAs and locations and how
19 to work with the networks.

20 So we placed the media buys for the campaign.

21 Q Do you still own AMMC?

22 A Yes, sir.

23 Q And is AMMC still operating?

24 A I'm hoping to start AMMC up with more buy-ins at some point, yes.

25 Q Has AMMC had any other clients besides the Trump campaign and the RNC?

1 A And TMAGA as well, sir.

2 Q Okay. Any other client besides TMAGA, the Trump campaign, or the RNC?

3 A No. I didn't have the ability to go out and get more clients, sir.

4 Q So the clients that AMMC had, are you the one who went out and got those?

5 A The -- you mean the Trump campaign, RNC, and TMAGA?

6 Q Yeah. You said you didn't have the ability to get more clients. Did you
7 consider those your clients?

8 A Yes. I mean, we did the work per the services agreement with the entities.
9 I wished I would've been able to get more clients for AMMC so I can continue AMMC in
10 the future, and I hope to do that at some point.

11 Q That you could -- in order -- you mean as a profit-making exercise, right?
12 You would get more clients and you would make more money, right? I mean as a
13 business, not in a nefarious way. As a business.

14 A Yeah, the way you said it made it sound like I'm greedy.

15 Q No, no, no, no, no.

16 A Like, I want to be able to -- so I'll be honest with you, sir. I want to be able
17 to get away from, like, the campaign individually and work for multiple campaigns, and I
18 think that AMMC is a way to continue that.

19 BY [REDACTED]

20 Q Like a Brad Parscale.

21 A Not on that level.

22 Q Well -- or I would've said like a Parscale or a Coby. That seems to be
23 a -- that seems to be a bit of a trend, isn't it, where there's vendors who work on the
24 campaign and then they split off and try to go for more campaigns and not just working
25 on one, right?

1 A Yeah, it's pretty common. I mean, even Red Curve, right? Brad Crate
2 started on Romney in '08 and then, 2012, started building his own company and started
3 Red Curve.

4 I think it's pretty common within politics to get that knowledge and the
5 ability -- you know, you learn it on a campaign. It's a lot of work and it's, you know, a
6 pain in the ass, to be upfront with you, but it makes it to where you learn it all, and you
7 can provide that to other campaigns. So it's pretty common, I guess.

8

BY [REDACTED]

9 Q Were you compensated for your work with AMMC, as the CEO?

10 A Yes, sir.

11 Q And how much were you compensated?

12 A \$40,000 a month.

13 Q Okay. And when did you start getting \$40,000 a month?

14 A It was either August or September --

15 Q Of what year?

16 A -- of 2020.

17 Q Of 2020. And are you still making \$40,000 a month from AMMC?

18 A No, sir.

19 Q Okay. So you said August of 2020, and what happened prior to August
20 of 2020? Were you paid for anything with AMMC?

21 A Yes, sir. It was a lower dollar amount. I think it just gradually grew with
22 the amount of work that I had to put into AMMC.

23 Q Okay. So tell us about, what salary did you begin at with AMMC?

24 A It was \$10,000 a month.

25 Q And when was that?

1 A 2018.

2 Q And then you ended up at \$40,000 a month at September of 2020?

3 A It was either August or September, sir. I don't remember when it was.

4 Q And when did you -- and when was the last time you got paid by AMMC?

5 A It was December in -- December 2021.

6 Q December 2021. And that was also still \$40,000 a month?

7 A Yes, sir.

8 Q Did AMMC do any work in the year 2021 after the campaign was done and
9 Joe Biden was inaugurated?

10 A After -- say again. Sorry.

11 Q After January 20th of 2021 --

12 A Not --

13 Q Let me ask the question. After January 20th of 2021, did AMMC do any
14 work for its clients, namely the Trump campaign, potentially the RNC or TMAGA?

15 A No, sir, we didn't have any other clients. By "we," I mean I didn't have any
16 other clients, because I'm by myself.

17 Q And did you set your own salary for AMMC, or did someone else set your
18 salary?

19 A I had the approval from, I believe at the time, Justin Clark, when he was the
20 deputy campaign manager, and then a signoff from the treasurer, Bradley Crate.

21 BY [REDACTED]

22 Q You said you started getting a salary back in 2018, I thought you said, of
23 \$10,000 a month.

24 A Yes.

25 Q So who was approving your salary then?

1 A Who approved AMMC? AMMC is its own --

2 Q Right. When you were --

3 A -- entity, so I --

4 Q When you were making \$10,000 a month in 2018, who set that salary
5 amount?

6 A I asked for that salary amount from the campaign.

7 Q Who at the campaign?

8 A At that time, it would've been Bradley Crate and Michael Glassner -- oh,
9 wait, no -- Brad Parscale.

10 Q So people at the campaign approved your salary for a separate and
11 independent business that you owned?

12 A No. I asked for \$10,000 a month. If it was paid to AMMC, it was for
13 myself for running AMMC.

14 Q Your --

15 A Just like any other vendor going through the campaign and saying, "I want to
16 be paid \$20,000 a month to provide these services."

17

BY [REDACTED]

18 Q But, Mr. Dollman, AMMC -- hundreds of millions of dollars of campaign
19 expenses went through AMMC, right?

20 A Yes, sir.

21 Q So what we're trying to understand, sir, is, if you own AMMC, why would you
22 be asking campaign employees to approve your salary, as opposed to, you own a
23 company, you run it, and you decide how to split the profits from your company? Why
24 are you making the profits of AMMC, as opposed to a salary approved by campaign
25 officials?

1 A I wish they had set it up as a profit base, but AMMC's goal was to provide
2 savings to the campaign.

3 So, normally, a campaign would hire a general contractor, a GC, to the campaign,
4 and they would, in turn, hire sub-vendors, and from those sub-vendors, they would take a
5 percentage of whatever the spend was with those sub-vendors.

6 AMMC did not take a percentage of spend by the campaign. And the goal of that
7 is to make sure that we were using donor dollars the most efficiently and what was best
8 for the donor.

9

BY [REDACTED]

10 Q Right, because, effectively, AMMC was just the campaign, it was just you.
11 Because if you were a third-party company -- let me put it this way: Who was your
12 competition as AMMC? Who were you competing against for the contract with the
13 Trump entities? Who was going to give a rate like you were?

14 A Who was going to give a rate like I was?

15 Q Right. Like, what entity was going to compete with AMMC for the role that
16 it played in just facilitating invoice payments to media-related vendors?

17 Like, the point that you just made was that, in a normal situation, if I understood
18 you correctly, you would have a company that would work with outside vendors and
19 would charge them, right? It would be a profit-making entity, presumably. But the
20 beauty of AMMC was, they just got rid of that, didn't charge, and all the savings went to
21 the campaign, because you, the CEO of AMMC, were effectively the campaign. Your
22 salary was approved by the campaign.

23 What is the outside entity competing with you in that situation? Like, what's
24 the -- do you see what I'm saying? Do you see what I'm getting at?

1

2 [2:55 p.m.]

3 A I don't know who the outside entity would've been. It would've been
4 probably individual vendors. But this is not something new, I mean, it's been a thing of
5 Presidential campaigns for like 4 years. I mean, there was American Rambler, again, set
6 up by Ben Ginsberg, and for Mr. Mitt Romney in 2008 or 2012. There's GMMB for
7 President Biden. He also has another entity that did, you know, TV buy space, not
8 primary, but I believe every congressional committee has an individual or vendor that
9 does it.

10 [REDACTED] Oh -- well, you can -- I think we're going to say the same thing.

11

BY [REDACTED]

12 Q Well, yeah, I mean, Mr. Dollman, that's accurate, but the big difference here
13 is that Mr. Biden's, President Biden's entity did charge the campaign for the work it did,
14 and it cost the campaign money to have one global media buyer here. What you said
15 here is that AMMC was effectively a not-for-profit entity, correct?

16 A No. I think money --

17 Q No, no. Sir, I'm asking the entity itself, just to be clear. I wasn't clear.
18 Not you. Did -- AMMC itself as an entity did not seek to make profit, correct?

19 A But as the owner of AMMC, I was paid out of AMMC.

20 Q Understood, sir, but I'm asking you a specific question. AMMC as an entity
21 did not seek to make profit, correct?

22 A I don't -- I guess I don't understand the question.

23

BY [REDACTED]

24 Q Let me make it really easy, if I understood you correctly. In the situations
25 that you described in those other rambling rack -- the examples you gave, those other

1 situations, those companies would charge somebody, I think maybe, would you say, like
2 1 percent or something. Let's say they charge vendors 1 percent for the purposes of
3 processing through a campaign, having that central entity. I think AMMC has been paid
4 over \$700 million. So 1 percent would've been \$7 million, if I'm doing the math right.

5 You were paid \$10,000 a month, most of the time, that's 120 grand a year, and at
6 the high point you were paid 40 grand a month, and I don't -- was that for a full year?
7 Let's say it was. That's 480 grand. So you're still talking about less than a million
8 dollars to pay you to not have to pay all the other vendors.

9 So what we're asking you, did you understand that the structure of AMMC was
10 actually completely different than Romney's, than Biden's, the entire purpose of those
11 intermediary companies? Yes, the benefit is to process it all through one, but they are,
12 in fact, companies that do work that charge. They're not captive employees of a
13 campaign. And so what we are trying to figure out is, do you understand the structural
14 difference between those entities of what's required of an entity versus what you guys
15 were doing?

16 A I don't know the structure on American Rambler. I don't know what -- I
17 mean, like, from what you guys are saying, it sounds like you understand how Mr. Biden's
18 was set up. I do agree with you that, you know, I wish I would've got paid more money.
19 And by the way, if you get to talking, 7 million would've been really nice. Because it's
20 like thinning. I got a bad deal out of it. I get it.

21 But like I said, I want to continue AMMC in the future. My biggest part of being
22 the CFO or whatever from the campaign was I am a big proponent in making sure that
23 donor dollars are spent the most appropriate way. And when AMMC was created and I
24 agreed to do this for that cause, in my head, this was the best thing for donors --

25 Q Did anybody actually --

1 A -- and using donor dollars.

2 Q Did anybody tell you that? Did anybody like persuade you or make the
3 argument to you that the formation of AMMC -- because public reporting has suggested
4 that it was, in fact, Mr. Kushner that suggested the formation. But did anybody actually
5 tell you that your role as CEO for that company would enable the best use of donor
6 dollars?

7 A That they would enable the best use? No. I understand that if we paid an
8 entity \$7 million to manage the relationship with outside vendors versus paying myself to
9 manage that relationship at a local rate, I mean, it saved the campaign money.

10

BY 

11 Q So just to be clear, Mr. Dollman, when you say we, you're saying you decided
12 this or campaign staff more senior than you decided this setup made sense?

13 A And I apologize because I know I said "we" like a million times in our
14 informal one. And for some reason, I always use "we" when I'm talking about myself.
15 So I knew it would save the campaign money if I was paid on a monthly rate instead of a
16 percentage.

17 Q So you did it out of the goodness of your heart? Was it just you being just a
18 good Trump supporter that you decided you would save the campaign millions of dollars,
19 and you as a one vendor decided it? And you went to Justin Clark and you told him,
20 Clark, I got a good idea. I'll just save you guys millions.

21 Is that your testimony, that it came from you?

22 A That I requested to be paid on a monthly basis? Yes, I did request to be
23 paid on a monthly basis.

24 Q No, sir. I didn't ask you that. I'm going to ask you to answer the question
25 that I asked you. I didn't ask you -- we understand you were paid on a monthly basis.

1 AMMC, as you testified to, as an entity did not make profit by charging the
2 campaign additional fees, correct?

3 Mr. Dhillon. Well, I'm going to jump in here. I think he's already -- this is
4 getting slightly harassing. He's testified that he's paid \$40,000 a month, and that that
5 was going to AMMC. He engaged in an agreement with the campaign. The committee
6 wants to quarrel with whether he should've made more money or less money. I
7 suppose that you can do that. But I think he's already testified that -- and frankly,
8 counsel, I think you're putting words in his mouth to say that AMMC was a nonprofit.
9 AMMC was being paid \$40,000 a month so that he -- that was his salary. That was a
10 contract he made with the campaign. I think that's his testimony.

11 [REDACTED] Well, Mr. Dhillon --

12 Mr. Dhillon. [Inaudible] your question.

13 [REDACTED] Well, if I can clar -- well, it doesn't, Mr. Dhillon.

14 I just want to clarify something, Mr. Dollman. AMMC is a corporate entity that is
15 separate from you, Mr. Dollman, as an individual, correct?

16 Mr. Dollman. No. I own AMMC.

17 [REDACTED] Sir, I didn't ask you that. I'm asking, do you understand
18 the distinction between a corporate entity existing and an individual person existing, and
19 those being different things, even if that one person owns the other company that a
20 corporate entity separate from an individual? Do you understand what I mean when I
21 draw that distinction?

22 Mr. Dollman. No. I apologize. I don't understand the distinction.

23 BY [REDACTED]

24 Q That's okay. We want to make sure -- to your attorney's point, we want to
25 make sure that we are not making it confusing or assuming certain things. And

1 understanding that you're not a lawyer, there may be some things that we need to
2 explain and kind of set the foundation for, so that's on us.

3 So your entity, AMMC, I believe, is an LLC. And you may be the sole member. I
4 don't know what the legal structure is. But your understanding is that you own AMMC,
5 correct?

6 A Correct.

7 Q Okay. But for the purposes of legalities, do you understand that the entity
8 of AMMC is separate than you as a person in the sense that AMMC can do things as an
9 entity that wouldn't be impugned on you; you can do things as an individual that might
10 not necessarily, depending, be impugned on AMMC that you're separate in the sense of
11 an individual and an entity?

12 A Yeah. I guess I'm just having trouble understanding, because if I'm the
13 owner of an LLC and I receive payment out of the LLC, I don't -- I just don't see the
14 separation. And I apologize.

15 Q No, that's okay. That's why we're explaining it. What my colleague was
16 trying to point out was, in the normal course of how business would run, if I ran a
17 company or an LLC in this example, and I was contracting with somebody, I would
18 probably say, I'm offering you these services for X amount of dollars. They don't need to
19 know what my cost is, they don't need to know what my profit is, they don't need to
20 know what my salary is. I could decide to take zero salary and dump all the money back
21 into my company and reinvest it, right? My salary is really none of their business.
22 What matters is I'm offering services for X dollars.

23 In your situation, what was a little different, if we were understanding you, was
24 that you weren't charging for your services as much as it sounded like they were paying
25 zero for the cost of the services. They were basically approving your salary as like a flat

1 salary to do everything. Because no matter -- if we understood you correctly, no matter
2 how many invoices came in, you made the \$10,000 a month that the campaign approved.
3 During the \$40,000 period, no matter how many invoices came in, no matter how much
4 AMMC had to process, you made \$40,000 a month. Is that right?

5 A That's correct.

6 Q So that's a very different model when you're talking about a consultancy or a
7 vendor relationship, right? If we look at Mr. Parscale, if we look at Mr. Coby, if we look
8 at even other vendors that the campaign used, what we were trying to understand was
9 that's a very different operational and compensation model than any other vendor.
10 Because, essentially, when my colleague said, oh, it's a nonprofit, it's because -- was it
11 your understanding that you were charging for your services or was it your understanding
12 that you were getting a salary from the campaign for running AMMC and processing all
13 those invoices?

14 A From my understanding is that why it went from 10,000 to 40,000 and
15 increased in that time was because the amount of work that AMMC was doing. So when
16 you said that it didn't matter how many invoices, obviously, you get how much work I had
17 to do, it was tied to the salary. And I get what you guys are saying. I wish I would've
18 hired you as lawyers to go and argue my point and, like, make more money, but, I mean,
19 it was the agreement that I set with the campaign through AMMC.

20 Q And let me be clear, we're not saying you should have made more money.
21 Okay?

22 A No, I think I should've. You're right. It would've been great. You know,
23 it would've helped pay for legal bills.

24 Q Because here's the question, Mr. Dollman: Have you talked with any other
25 campaigns about using AMMC as a company to process all their media payments?

1 A I'm currently in the works of working with a couple of other individuals and
2 working with their clients.

3 Q And are they Trump activities? I don't want you to necessarily disclose who
4 they are, but --

5 Mr. Dhillon. Okay. I'm going to -- I'm going to jump in here. Now we're
6 getting into stuff that's so far afield to the January 6th Committee's investigation. I can't
7 imagine why the committee would think to ask -- frankly, I'm going to need to say
8 this -- the right to ask Mr. Dollman what business he's engaged in today. He's no longer
9 with the campaign. He should not have to reveal potential clients. This is too far afield
10 for the committee's investigation. So I'm going to instruct him not to answer any
11 questions about his present practices.

12 ██████████ Mr. Dhillon --

13 Mr. Dhillon. His present business practices. And I'll keep talking to
14 you -- unless you want to -- I'll be talking to convince you that this is not an appropriate
15 area of inquiry for this committee, in my view, nor for his business.

16 ██████████ Mr. Dhillon, we were going about this in a way to be really clear and
17 careful with Mr. Dollman. The entity of AMMC, its financial -- it's absolutely within the
18 purview. We were going out of our way to kind of simplify this and give examples to be
19 super, super clear. But we can put some documents in front of Mr. Dollman right now
20 to make it exactly clear why this is within the purview of the committee's investigation.
21 We were going in a roundabout way to kind of help explain some things so that it made
22 more sense. But we will put documents in front of him right now that make it
23 abundantly clear why it is directly within the purview of the committee.

24 Mr. Dhillon. Yeah. I think at this point, put the documents in front of us, if you
25 could show that what he's trying to do is build his business today is somehow relevant to

1 this committee investigation, I'll allow him to answer the question.

2 Mr. Dollman. So real quick -- and I apologize to jump in in this extremely fun
3 time. I need to know if we're going to extend longer than 4:00 at the latest and -- so I
4 can change my flight.

5 [REDACTED] One thing, I mean, Mr. Dollman, we're going to keep
6 moving. We'll try to get done by 4:00. If we're not done, we're not. But that's the
7 decision you'll have to make, sir. As I told your lawyer, we asked for the day to be kept
8 fully open. We're trying to move quickly, and we are moving at a good pace, if you can
9 believe that. So if you want to move your flight now, we're happy to take a break, or we
10 can keep pushing and touch back on the subject in a half hour and see where we are.

11 Mr. Dhillon. You said keep it open till 4:00, so that's what we have done. So if
12 you're going to go past 4:00, we'd like to know. But we'll keep going. We'll see how
13 far we go for now. Okay?

14 [REDACTED] I mean, Mr. Dhillon, the point I'm making is that his travel
15 plans --

16 Mr. Dhillon. Let's not argue that. Let's keep going and see if we can finish by
17 4:00. We'll jump in if it becomes an issue.

18 [REDACTED] Just keep going.

19 BY [REDACTED]

20 Q Now, as CEO of AMMC, Mr. Dollman, were you in charge of deciding what
21 vendors AMMC would hire to conduct work?

22 A I'd work with sub-vendors to AMMC to work with other individuals, yes, and
23 different vendors. Sometimes the campaign would reach out to me on who to work
24 with.

25 Q And would they tell you or ask you?

1 A They'd ask me to reach out to vendors.

2 Q They would direct you, correct?

3 A In form or fashion.

4 Q Was there any sub-vendor that you hired that you were not directed to by a
5 campaign official?

6 A I mean, I worked with sub-vendors to AMMC to place media or do whatever
7 with other vendors that were not directly requested by the campaign.

8 Q What's an example of that?

9 A So might use The Trade Desk for one, Verizon, different sub-vendors within
10 the digital universe to place digital ads.

11 Q And when you say place digital ads, on what medium?

12 A Well, different sub-vendors. So it would be, you know, ones that would
13 place it on websites that weren't ran by Google ads or it just -- individual separate
14 vendors that would be able to place ads on separate websites or different location. I
15 mean, the world of digital advertising could be anybody, you know, that would be able to
16 place it on a website.

17 Q Okay. So the world -- so public reporting has said Gary Coby, the digital
18 director, handled what you're talking about now. So tell us about how your
19 responsibilities compared to what Gary Coby was doing, what you just said you were
20 doing. What's the -- like selecting vendors, placing ads, tell me, did you work with him
21 or are you doing a separate task?

22 A Well, I worked with Direct Persuasion, and the main person there was Daria
23 is who I worked with.

24 Q Daria Grastara who works for Gary Coby?

25 A Worked for Direct Persuasion, is who we hired.

1 Q Yeah, sir, but, I mean, she -- she works with Gary Coby. Are you disputing
2 what I'm saying that she works for Gary Coby?

3 A Gary Coby owns Direct Persuasion. So, yes. I don't know if he's the sole
4 owner, but --

5 [REDACTED] But you're aware of Mr. Coby's role with the campaign, correct?

6 Mr. Dollman. Yes, he was the digital director.

7 [REDACTED] Okay.

8 BY [REDACTED]

9 Q What I'm trying to understand, Mr. Dollman, is that, are you saying as part of
10 your responsibilities as the head of AMMC, you were also -- you were involved in placing
11 digital ads? Can you just clarify what you're saying you were doing?

12 A No. I was involved with the allocation of the funds in digital ads. So if we
13 had a budget amount from the campaign on how much we could spend on digital, I would
14 work with Daria on the amount to be spent with digital. And then Daria worked with
15 other vendors and pub vendors on placement of ads.

16 Q When you say you worked with, what does that mean? Does that mean
17 you handled the invoicing or would you give -- because what I'm trying to understand,
18 Mr. Dollman, is whether these sub-vendors are working for you and are reporting to you
19 or whether they're not. So when you say you hired Direct Persuasion, does that mean
20 Direct Persuasion reported to you as it related to its work for the Trump campaign?

21 A I mean, they reported it to me as their work related to the Trump campaign,
22 and I worked with them on the amount of spend in the placement of spend. So if we
23 didn't have the budget within AMMC to place ads across the entire spectrum, I would
24 work with Daria on location. So I had weekly meetings with Daria and her team.

25 Q Here's what I want to clarify, Mr. Dollman. Are you talking -- when you say

1 they reported to you -- because we had received extensive information that Gary Coby
2 was the digital director of the Trump campaign, and anyone who had anything to do with
3 the digital team and any of the content reported to him. And I just want to clarify
4 whether you're saying that there's something different that was going on than you were
5 involved in this process or they reported to you ultimately. But we received information
6 that is not consistent with that. So can you just clarify for us what exactly you're saying?

7 Are you talking about reporting to you with regard to the financial invoicing or is it
8 just to that subject of financial invoicing?

9 A That's correct, yes, sir. When I said reporting, I didn't mean like they -- I
10 was their, you know, end all be all, only person who spoke with the reporting on financial
11 spend within pub vendors --

12 Q Okay.

13 A -- and things.

14 Q All right. So I want to put the financial invoicing aside, because as CEO of
15 AMMC, your role and control of AMMC was more expansive than just the financial
16 invoicing, correct?

17 A What do you mean as AMMC, that I didn't just oversee invoicing? Is that
18 right?

19 Q Well, I'm asking you that. Is that correct? As CEO of AMMC, did you do
20 more than oversee invoicing?

21 A Yeah, I worked with the individuals on how much the spend was. And
22 again, like I said earlier, I worked with Claire Murphy-Cook and where she was placing ads
23 in TV and working with the TV vendor for the ad placement.

24 Q Let me give you a precise example. Have you heard of Phunware, the
25 company that created the Trump app?

1 A Yes.

2 Q Phunware was paid by AMMC to create the Trump app, correct?

3 A Yes.

4 Q Okay. Did you select Phunware as a vendor to create the Trump app?

5 A No, sir.

6 Q Who selected Phunware?

7 A The campaign.

8 Q So did someone from the campaign direct you that Phunware would be
9 making the app and AMMC would be paying Phunware?

10 A That the vendor for that would be Phunware and AMMC would be managing
11 that relationship with Phunware, yes.

12 Q And who told you that, from the campaign?

13 A Brad Parscale.

14 Q Brad Parscale. Were you in a position to say no to that or you understood
15 that the campaign had final say on things like that?

16 A I believe AMMC would have had the position to say no. AMMC -- or if I
17 didn't think that I wanted to pay Phunware for it.

18 Q So is your testimony that when you were told by Brad Parscale, you then
19 made an independent determination to hire Phunware?

20 A Yes; that he would pay down Phunware as a sub-vendor, yes.

21 Q Do you remember a single instance where anyone from the campaign
22 directed you to do something for -- as AMMC head and that you rejected it and made a
23 different determination as the head of AMMC?

24 A Yes.

25 Q What's an example of that?

1 A One of them being Jamestown to do the production of the ads for TV.
2 AMMC did not pay down Jamestown as the production company. Another one where
3 AMMC was asked to do polling for the campaign, and I said AMMC is not doing polling for
4 the campaign.

5 Q Now, sir, with regard to Jamestown, though, the Jamestown decision of who
6 should pay for Jamestown, is your testimony that you said -- well, let me ask you, what
7 was the reason why you said no to paying for Jamestown as AMMC?

8 A I just -- as, you know, working within, in previous campaigns, I did not want
9 to work with Jamestown.

10 BY [REDACTED]

11 Q Can you explain like -- can you go into that further? Did you have like a
12 negative experience with them on a specific campaign?

13 A No. I just -- I had trouble following invoices for them, and I just didn't -- I
14 didn't have trouble with them. I just didn't want to continue with Jamestown --

15 Q Were you aware --

16 A -- and pay Jamestown.

17 Q Oh, I'm so sorry. I didn't mean to cut you off.

18 Were you aware that Jason Miller, I think, had -- excuse me. Yeah, I thought it
19 was Jason Miller who came from Jamestown.

20 A That's correct.

21 Q And that was Larry Weitzner's shop too, correct?

22 A Yes, ma'am.

23 Q But when you say you didn't want to work with them, the campaign did end
24 up working with them to make television ads regarding the election irregularities, didn't
25 they?

1 A Yes, ma'am.

2 Q So, I guess, can you walk us through the point and the decision where you
3 said the campaign wanted to use -- the campaign wanted AMMC to use Jamestown
4 Associates, but -- so did you basically just say those payments couldn't go through
5 AMMC? Because the campaign did end up using Jamestown Associates, didn't they?

6 A Yes. And I did not have the decision on who the campaign would be hiring
7 as a vendor, but I did have a decision on AMMC. And the question was, was there an
8 example of someone that I did not want to hire at AMMC that the campaign wanted me
9 to hire. The campaign ultimately hired Jamestown to provide the production, but
10 myself, AMMC, did not want to hire Jamestown.

11 Q Gotcha. So you said I --

12 A [Inaudible] at the end there -- sorry, you didn't hear what I said, I apologize,
13 but I trailed off at the end. So it sounds like you did.

14 Q No, no, I think I understood you. You were saying you did not want that
15 entity to go through AMMC. The campaign could still hire them and choose them, you
16 just didn't want the Jamestown relationship to be processed through AMMC.

17 A That's correct.

18 Q And that was based on a negative experience that you had had with them on
19 a prior campaign?

20 A Just, no relationship with them. I just didn't have a relationship. And I
21 don't know if it was a negative experience, I just didn't want to pay Jamestown.

22 Q Okay. And the other example you gave -- I'm sorry, it was a couple of
23 minutes ago, and my memory's not great either, but what was the second example that
24 you gave?

25 A No. Polling, so -- like polling.

1 Q And why --

2 A Field surveys, whatever, yeah.

3 Q And who asked you to run polling expenses through AMMC?

4 A Brad Parscale.

5 Q And what did you tell him was the reason for why you didn't want to run it
6 through AMMC?

7 A That it wasn't a service that AMMC provided to the campaign.

8 Q How was it --

9 A That it's not a media -- that it's not a media-related buy or service.

10 Q Okay. Okay. So -- and I remember us talking about this in the informal,
11 that you had a rule, right, that it had to be media related for you to agree to process it
12 through AMMC. Am I remembering that correctly?

13 A Yes. That's correct. I don't really remember a whole lot of the informal
14 one, but I do recall discussing that.

15 Q Yeah. No, that's coming back to me. Okay. So that one fell under the
16 nothing that's not media. Jamestown fell under the "I just don't like him, I can't say
17 why" kind of bucket. Is that fair?

18 A That's fair.

19 Q Okay.

20 A Yes, ma'am.

21 Q Okay.

22 BY [REDACTED]

23 Q Well, I mean, is there any reason you can give? Because of the almost
24 billion dollars that goes to AMMC, why Jamestown? Because, you know, there's also
25 concerns, right, with if AMMC were to pay for a TV ad versus from the campaign fund,

1 would that impact potential disclosures or disclaimers on the TV ads that would go out as
2 in who it was paid for by?

3 A No, sir. If the campaign has a TV ad, it has to be paid for by the campaign
4 or it has to have a disclaimer on the TV ad, whether it was AMMC or the campaign. So
5 there's still like a -- it's called mat form, and you have to fill it out for the TV entity to run
6 it, the ad.

7 Q And you said here, when it came to the TV ads -- let me ask you, who did you
8 tell that you didn't want AMMC to do Jamestown? Who did you say no to?

9 A I believe it was -- to me it was a long time ago, but I believe it would've been
10 Brad Parscale.

11 Q So you're saying the TV ads were done -- this is TV ads before July of 2020?

12 A I think Jamestown was -- you know, did quite a few campaign ads for the
13 campaign. So I don't know the timeframe, but I would think it's before July 2020.

14 BY [REDACTED]

15 Q Well, it certainly wasn't the conversation was with Parscale. That was
16 where the July 2020 came in, because he's gone then. So if you had the conversation
17 with Parscale, it was presumably before he left as campaign manager, which would have
18 been July 2020.

19 A That's a good observation. I was trying to figure out where July 2020 came
20 into play.

21 Q We're not that creative. So there's some pretty big like --

22 A I was like, wow.

23 Q There's some momentous dates that we use, and Parscale out in July 2020 is
24 one of our road -- not roadblocks, not land lines either. I think you know what I mean.
25 Road signs, roadmaps. There we go.

1 A Yeah. Roadmap. Understood.

2 Q But I guess what I was more getting at was, my understanding was they used
3 Jamestown Associates later on for television ads, actually leading up to the 2020 election.
4 But also afterwards, between the election and January 6th, did you also not process those
5 Jamestown expenses?

6 A Not for the production. We did -- AMMC did one ad placement, and I
7 forgot the timeframe, but we did one ad placement for the campaign. And then the
8 second ad placement AMMC did not do for the campaign.

9 Q And do you remember why you did one and not the other?

10 A No, ma'am.

11 Q Who dictated whether you did one and not the other?

12 A I was trying -- at the time, it was the end of the election and the -- you know,
13 and it was over, and I wanted to roll out AMMC from the campaign itself.

14 Q Oh.

15 A I was trying to close every way it should.

16 Q Oh, so you actually said, no, we're done, we did the one, now we don't want
17 to do the second one?

18 A And this will go directly through the campaign and not AMMC.

19 Q And who did you tell that to then?

20 A In that timeframe, post-election and recount, like I said, was kind of a
21 cluster. So I don't -- it probably was Justin Clark.

22 Q Well, let me ask you, would you have had to tell anyone? Or when you got
23 the invoice, could you have just said, I don't want to process this through AMMC, I'm just
24 processing it through the campaign? Didn't you have the ability kind of a CFO to say I'm
25 okay with this going through AMMC, or I don't want it to so it needs to go through the

1 campaign?

2 A It still would've had to been approved by someone to be able to pay it. So
3 whether it was AMMC or the campaign, it wasn't my decision. So on that level, I believe
4 it was Justin Clark for the approval of it. And I don't know if at that time, if I was, you
5 know, wearing my AMMC hat and said AMMC is not going to do it or not.

6 Q Do you remember having conversations with anyone at Jamestown,
7 notifying them, hey, send your invoices directly to the campaign, don't send them to
8 AMMC?

9 A No, I don't. I don't recall --

10 Q How would they have known --

11 A -- that.

12 Q How would they have known not to send the invoice to you the second time
13 when you didn't want to process it?

14 A So it's not Jamestown for the -- so Jamestown does the production of ads,
15 but they don't do the ad placement. So AMMC worked with Harris Sikes Media to do
16 that -- the ad placement. And in that case, it was Harris Sikes who reached out. And I
17 don't remember if I said, hey, that needs to go through the campaign because AMMC is
18 no longer doing ads or if it was directly from Justin Clark or someone else on the
19 campaign coming in to send it directly to the campaign.

20 Q Gotcha. Okay.

21

BY [REDACTED]

22 Q And, Mr. Dollman, I want to talk about Phunware. You said someone from
23 the campaign direct told you that Phunware would be making the ad.

24 What control did you have over what Phunware was doing? Were you -- as a
25 sub-vendor of AMMC, were you giving directives to Phunware of what to do?

1 A I was working with Claire Murphy-Cook, who was a sub-vendor to AMMC,
2 and she was working with Phunware.

3 Q Now, Claire Murphy-Cook, she used to work for Brad Parscale, right, or still
4 does?

5 A I do not know her current employer, but she used to work for Brad Parscale.

6 Q And when you say you worked with -- because you use the term "with"
7 often, and I'm trying to distinguish between worked with and when you're directing
8 someone. Because to me, "with" could be collaborative, but not necessarily directive,
9 and so I want to just draw a distinction there.

10 So when it came to Phunware, were you directing anyone when it came to the
11 actual creation and running and substance that was on the app?

12 A So I do not have the app knowledge, and I hired Claire Murphy-Cook, who
13 was managing that relationship with Phunware.

14 Q So Claire Murphy-Cook and you were paying -- she was being paid how?

15 A As a sub-vendor for AMMC.

16 Q Okay. And you selected her or did someone else select her?

17 A I asked her to work for AMMC. I don't believe I was told to hire her.

18 Q Well, you said you don't -- what I'm trying to clarify here is that, did you pick
19 her because you made an independent determination she had the skill set or is this
20 someone who was -- you know, knew Mr. Parscale well, was from that world, and that's
21 why she was handling this relationship?

22 A I think she knew the direction of the way the campaign wanted to go. And I
23 don't really know -- like I said, I work on my computer and keep my head down. I didn't
24 really know a whole lot of other people to reach out to to provide the visualization of
25 what the app was going to be for the campaign.

1 Q But who was directing the process? Was it you or was it the campaign?

2 A The process of creating the app?

3 Q Creating and running and putting content out on the app.

4 A Well, AMMC hired Phunware and agreed to a scope of work for Phunware.
5 But the creation was in, like, what was going on in the app was ran by Claire
6 Murphy-Cook.

7 Q Who worked for you?

8 A AMMC, yes.

9 Q Okay. So she reported to you?

10 A She gave me updates on like where the app stood and like the creation of
11 that. Like, where -- I don't know how apps actually work, so well, my colleague had
12 formed them and created and built. But she did work pretty close with Brad Parscale at
13 the time as well.

14 Q Mr. Dollman, just for the sake of timing, what we want to just parse through
15 here is who's doing what and who's working for who. Because I use the term
16 "reporting" to you, and I see what I believe you're purposefully not adopting my use of
17 the term "reporting" to you. So if there's a different way to understand the framing,
18 let's kind of cut through it and get to it.

19 There was an app here. It was created -- AMMC, we know, was a contracting
20 party with Phunware. But someone was directing folks at Phunware. Some people at
21 the campaign were putting messages through the app. And we want to know what role
22 you played.

23 So it's either you were directing. As the CEO of Phunware, you were in
24 this -- excuse me, CEO of AMMC, or you weren't. And if you weren't, then we would
25 appreciate if you could tell us, if you know, who was involved.

1 A So, okay, thank you for the explanation on the reporting side. So Claire
2 Murphy-Cook was the one working with Phunware directly and reporting back to the
3 campaign on the fundraising -- or not the fundraising, but the Phunware app and
4 creation.

5 Q Okay. And is it fair to say that the campaign -- when the app was launched,
6 that the campaign was dealing directly with Phunware in getting messages published on
7 the app?

8 A I'll be honest with you, I don't know how the messages got on to the app.

9

BY [REDACTED]

10 Q Mr. Dollman, I just want to clarify because, if I understood you a minute ago,
11 you were saying that Claire Murphy-Cook worked for you at AMMC and was the point
12 person for Phunware. Did I get that right?

13 A That's correct.

14 Q So Claire Murphy-Cook lists online that she has worked at Parscale Strategy
15 for the last 2 years and 11 months. And prior to that, she was a VP of account strategy
16 at Parscale Digital for 4 years.

17 So did she work for you at AMMC or did she work for Parscale Strategy and AMMC
18 paid Parscale Strategy for her work?

19 A We paid Claire Murphy-Cook directly as a subcontractor to AMMC.
20 We -- and I apologize, I did it again -- I, AMMC, paid Claire Murphy-Cook for her services
21 to AMMC.

22 Q Okay. And it's a helpful clarification. I know it seems like what does it
23 matter, but I think you understand, like, at times it matters.

24 Did Mr. Dhillon, did he just wave up? Was he trying to flag us down?

25 A No. It's just a hand coming onto the screen.

1 Mr. Dhillon. I'm just stretching here.

2 [REDACTED] Oh, okay. Sorry about that. I just wanted to make sure we weren't
3 ignoring him if he wanted to be heard.

4

BY [REDACTED]

5 Q Now, Mr. Dollman, in the post-election period, there were messages
6 reported that went out over the Phunware app that stated things like, Joe Biden is
7 rushing to falsely pose as the winner of the 2020 election. And it was saying that the
8 American people were lacking an honest vote count.

9 Effectively, Phunware was saying that there was election fraud, claims that have
10 been -- that are now not substantiated. And you were made aware of those claims
11 when Tim Murtaugh sent you an email noting that the Associated Press was going to run
12 a story about Phunware sending these false messages.

13 Do you have a recollection of having discussions about post-election
14 fraud -- post-election fraud messages going out on the Phunware app?

15 A I do not recall. I did not know at the time that Phunware was -- had
16 messages going out on the app.

17 Q So I'm going to show you what's been marked as exhibit 22 that shows you
18 responding to an email noting just that. And on page 2 of the email of 22, which will be
19 up in just a minute, but I'm going to read it to you just so we can keep going, but you'll
20 see the content.

21 It's an AP reporter that writes to Tim Murtaugh. And you're not cc'd in the
22 original email.

23 And, sorry, I think we're almost there. Right here.

24 And he says, This is the email. I hope it finds you well.

25 He says he has questions regarding the development of the official Trump 2020

1 app by Phunware.

2 If we go to the next page, he lists out various issues he wants to raise. I'm going
3 to point you towards point number two. He says, The app pushed out content this week
4 stating that Joe Biden is rushing to falsely pose as the winner of the 2020 Presidential
5 election, and the American people lack an honest vote count.

6 And he said, What perspective can you offer regarding the app, distribution of
7 such messages, given that major media outlets have called the election for Biden, and
8 cybersecurity experts, as well as a coalition of State and Federal officials say they have no
9 evidence that votes were compromised or altered.

10 And he notes in point three that American Made Media Consultants paid
11 Phunware \$2.4 million. But as you noted, you already confirmed that AMMC did engage
12 with Phunware.

13 And if we scroll up on this document, Mr. Murtaugh forwarded to Stepien, Clark,
14 you, and Coby. He says, See below. I'm not inclined to answer.

15 And you respond, Agreed. Thank you for flagging.

16 Does that refresh your recollection as to being made alert about false election
17 claims going out, or should I say, election fraud claims going out on the Phunware app
18 and AMMC's involvement in that in November of 2020?

19 A I still don't recall this, but I see the email.

20 Q Okay. And you're saying you had no involvement in how the Phunware app
21 was used or how messages were sent out. Is that correct?

22 A That's correct.

23 Q Okay.

24 A The app itself, I was not aware that the app was doing which notifications at
25 this time.

1 Q Okay. Now, are you familiar with -- there's been a lot of public reporting
2 regarding AMMC, its creation, including the FEC implications of using a structure like
3 AMMC. Are you aware of that public reporting generally?

4 A Yes.

5 Q So I'm going to show you exhibit 23, which is a November 23rd email.
6 Again, we can go to the first -- the bottom of page 1 of that email. And it's Mr.
7 Murtaugh to Stepien, Miller, Clark, you, Cannon, and Matthew Morgan. And you
8 forward the Business Insider article that is about the formation of AMMC as -- you know,
9 it calls it the power -- it says the power and secrecy of the shell company has spurred calls
10 to Federal investigations. And it then discusses in broader detail claims regarding how
11 Mr. Kushner and Mr. Parscale created AMMC, and how they picked Lara Trump and John
12 Pence. And it goes on regarding what it calls the web of vendors and sub-vendors.

13 Is this an article that you noted that you were aware of -- well, first of all, are you
14 aware of this specific article we're talking about here?

15 A I am aware of this email. The article itself, I don't recall. I don't read a
16 whole lot.

17 Q What do you remember about the email when you say you recall this email?

18 A I just recall Tim Murtaugh sending it too.

19 Q And what do you recall about what happened in response to this email and
20 your response to that?

21 A Did I respond to it?

22 Q What do you recall doing in response -- I'm sorry, let me clarify. What do
23 you recall doing in response to this email from Mr. Murtaugh?

24 A I'm sorry, sir. Can you say -- what do I recall?

25 Q Yeah. Do you recall doing anything in response to getting this email from

1 Mr. Murtaugh indicating a variety of allegations regarding the company that you own?

2 A I don't recall what the response was.

3 Q Did you reach out to counsel to discuss the allegations that were in
4 the article?

5 A When was the article?

6 Q This is December 23rd of 2020.

7 A I probably spoke with Alex Cannon about it.

8 Q And you said you prob -- and what discussion did you have with him about
9 that?

10 Mr. Dhillon. Okay. That's going to be -- I'm going to object to that. I'm not
11 going to allow him to answer that question. That's getting into attorney-client privilege
12 matters. I also have no -- I'm not sure this is really within the scope of this committee's
13 investigation, but I'm going to instruct my client not to answer that question. Please
14 move on.

15 [REDACTED] Okay. In the body of the article -- we can scroll down if we need
16 to -- but it notes that after the election, there were some Representatives that sent
17 letters I believe to the FBI, the FEC, and then I believe a third Representative -- if you
18 scroll down a little bit more -- also wrote to the Justice Department and the FEC.

19 Mr. Dollman, have you been contacted by any of those agencies with regard to
20 any investigations into AMMC?

21 Mr. Dhillon. I'm going to object to that. I'm also going to say that Mr. Dollman
22 hasn't had a chance to read this. It's several pages. So if you're going to ask questions
23 about this article, you need to give the witness the opportunity to read this.

24 [REDACTED] Oh, no, I was literally just putting it up as a display. We can take it
25 down. He doesn't need to read the article to listen to my question.

1 My question was, have you been contacted by the FBI, DOJ, or FEC with regards to
2 any investigations related to AMMC?

3 Mr. Dhillon. The only article that you can ask him about has been taken off. So
4 I'd request that you either place that back up on the screen. If that's an exhibit you're
5 going to use and refer to, we have a right to see it.

6 Second, I'm going to instruct him at the moment not to answer that question
7 because I want to understand the question better.

8 But, third, I want to raise the point that it's 3:45, and if we're not going to get
9 4 o'clock, I want to give Mr. Dollman an opportunity to arrange -- if we're not going to
10 finish in 15 minutes, I want to give him the opportunity to make arrangements for taking
11 his flight -- his return flight.

12 [REDACTED] I think given what's happening now, that probably he should pause
13 and make arrangements to change his flight.

14 Mr. Dhillon. Okay. Well, Sean, you can go ahead and do that.

15 Let me ask you this question while he's doing that. Would you please restate the
16 question that you asked so I can decide whether it's appropriate for him to answer that
17 question? And then he's going to -- we're going to read this letter also while it's on the
18 screen.

19 [REDACTED] Sure. This is an article. I -- the only reason why I didn't want him to
20 think that it was -- so if you -- scroll up for one second. Let me get the bottom of the
21 page and the top -- no, the bottom of that page and the top of the next page. There we
22 go.

23 Is there any chance that -- I don't know if you see what we see -- but can you see
24 the underline where it says "requested the FBI and Federal Election Commission" on the
25 top page? And then on the top of the -- do you see what I'm talking about?

1 Mr. Dhillon. Representative Ted Lieu of California and Kathleen Rice of New
2 York. Is that what you're referring to, that that's a request by two Democratic
3 Representatives?

4 [REDACTED] Yes.

5 Mr. Dhillon. Is that what you're referring to?

6 [REDACTED] And then, on the next page, it says that Pocan, a Wisconsin Democrat
7 wrote Wednesday in a letter to the Justice Department and FEC.

8 So the reason I was saying that the letter is not necessarily the relevant part --

9 Mr. Dhillon. One second.

10 Okay. I'm sorry. Go ahead and tell me what the question is going to be.

11 [REDACTED] Yeah. So what I didn't want him to think -- those letters are noted in
12 that article, but those letters independently exist outside of that article. I didn't
13 particularly care if he saw the article that referenced him. I was just trying to ask him,
14 those letters were, in fact, sent. And what I was asking him was, has he, in fact, been
15 contacted by FBI, DOJ, or the FEC with regards to anything related to AMMC.

16 Mr. Dhillon. Okay. All right. I will consult with my client. He's on his iPhone,
17 so I assume he's planning his flight. He's rearranging his travel plans. And I would
18 request how much time it's going to take you?

19 Mr. Dollman. Shoot, they won't let me change it on the app on my iPhone.

20 Mr. Dhillon. All right. He's going to have to call because they won't let him
21 change it on the app. So if we can have like -- why don't we restart at 4 o'clock, if that's
22 okay, to do 4 minutes to do this?

23 [REDACTED] Yeah, that would be -- and, look, we totally understand, like, that he
24 needs to reschedule this. So we're here when you come back.

25 Mr. Dhillon. All right. Very good. Thank you.

1 [REDACTED] Thank you.

2 [Recess.]

3 [REDACTED] Mr. Dhillon, I think, did you say something about the last
4 question?

5 Mr. Dhillon. Yes. Mr. Dollman will answer the last question.

6 BY [REDACTED]

7 Q Okay. So let me -- I want to make sure I phrase it properly so that you
8 understand what we're asking.

9 That article that we had up previously just referenced some letters that were
10 written where Democratic Members of Congress wrote to the DOJ, the FBI, and the FEC
11 asking them to open investigations. And my question for you is not whether you knew
12 about those letters, et cetera. My question is, has the DOJ, the FBI, or the FEC reached
13 out to you in any way related to AMMC that you are aware of?

14 A So the FEC reached out to AMMC, and the FEC voted and closed the case
15 against the AMMC. And I believe those letters were in response to a Business Insider
16 article. So I don't know the factual basis behind those letters, but I do know the FEC is
17 already closed.

18 Q And to be clear -- I appreciate that answer. My question is, has a
19 representative from the FBI or any representative from the Department of Justice ever
20 contacted you related to AMMC?

21 A Oh, I don't think I've ever been contacted, no.

22 Q And that's why I wanted -- sometimes people go through background checks.
23 There's a number of reasons that are completely innocuous the FBI could contact you.
24 That's why I was saying, I'm just asking in relation to AMMC, had you ever been contacted
25 by those two agencies, and I understood your answer to be no.

1 A That's correct.

2 Q Okay.

3 [REDACTED] Go ahead.

4 BY [REDACTED]

5 Q All right. Mr. Dollman, can you tell me what DataPeer is?

6 A DataPeer is an entity that would be managing or email brokering for the
7 Donald J. Trump for President campaign.

8 Q And when you say email brokering, is it fair to say that it was an effort to
9 create a viable email list that the Trump campaign could use going forward after the 2020
10 election?

11 A Yes. The -- it wouldn't create the email list. The email list would've
12 already been owned by the entity, the campaign, and DataPeer would have been the
13 broker for the email list.

14 Q And was a point of that process engaging in something called warming up IP
15 addresses?

16 A Yes, sir.

17 Q And is that -- can you explain to us very briefly, like, what warming an IP
18 address is?

19 A I'll give you my best knowledge on warming up IPs. I'm not -- again, I can
20 barely turn on a computer, I feel like. So an IP is how the email list broker, not the ESPs,
21 or the email service provider. If you have IP addresses and you sent out a million emails
22 at one time, the likelihood that they would go into individual spam boxes or junk inboxes
23 would be pretty high because you didn't warm up the IPs.

24 So the idea is you gradually increase the number of emails that you send to a point
25 where the IPs are warm, then you would be able to contact individuals and not end up in

1 their standard junk inbox. That's my understanding of it.

2 Q And who did you work with in this project with DataPeer?

3 A Mr. Cannon and Mr. Centinello.

4 Q And that's Darren Centinello, correct?

5 A Yes, sir.

6 Q And when did this project start?

7 A I believe we originally discussed it in July of 2020. And I believe it
8 started -- I feel like it was October of 2020.

9 Q And were you compensated? I'm sorry. I didn't mean to interrupt.

10 A I said September or October. Everything's a blur at the end of the
11 campaign.

12 Q Were you compensated for your work with DataPeer?

13 A Yes, sir.

14 Q And when did your compensation start?

15 A What day? October I believe. Again, when DataPeer was created.

16 Q And how much were you compensated?

17 A I can't remember if it was 20- or 30,000.

18 Q A month, correct?

19 A Yes, sir.

20 Q And when did that continue until?

21 A DataPeer didn't continue past the new year.

22 Q Now, tell us about what role you served for DataPeer.

23 A My normal role in pretty much everything is the comptroller. So I was the
24 one that was paying invoices, receiving invoices, and making sure that services were
25 provided.

1 Q Now, when you say paying invoices here, who was getting paid?

2 A The ESP, the like vendors to the ESP or to DataPeer for like, you know,
3 validity. Darren Centinello, Alex Cannon, and I don't recall who else.

4  Can you give us 1 second?

1

2 [4:00 p.m.]

3 [REDACTED] Mr. Dollman, I want to be really realistic and respectful of your time,
4 because I'm looking at, like, the -- we don't have much questioning left, but if you had a
5 hard stop at 4:00 p.m. and we take 10 or 15 more minutes and that 10 or 15 minutes
6 causes you to miss your flight, I'd like for you to not be stranded and have a plan.

7 So, like, I just want to understand, like, what is the situation right now? Because
8 if the answer was hard stop at 4:00, we're 2 minutes over and I'm feeling guilty with every
9 minute. So I just want to make sure we understand what the travel plans are right now.

10 Mr. Dhillon. Let me jump in there. He has a 5:50 flight --

11 Mr. Dollman. 5:50, 5-0.

12 Mr. Dhillon. -- at DCA. So our hope is, we want you to get what you need and
13 we want to be as accommodating of you. So our only request is, please go as quickly as
14 possible, and then we'll try to get him to the airport. He's TSA Pre, so we've already
15 gone through all that. Hopefully he can get through there and get on that plane before
16 it goes.

17 [REDACTED] No checked bags, right?

18 Mr. Dhillon. No checked bags. Bags are ready to go. So, if you can proceed
19 with alacrity, we can get through it.

20 [REDACTED] Okay. All right. I just wanted to make sure. Okay. We're good.

21 Mr. Dhillon. Thank you.

22 Mr. Dollman. Thank you.

23

BY [REDACTED]

24 Q Mr. Dollman, so we were talking about your role with DataPeer. You said
25 that was your typical role of handling invoices and paying those. Is that fair?

- 1 A Yes, sir.
- 2 Q Do you recall how Mr. Cannon was paid?
- 3 A Say again, sir?
- 4 Q Do you recall how much Mr. Cannon was paid for his role with DataPeer?
- 5 A I believe it was also \$30,000.
- 6 Q A month, correct?
- 7 A A month, yes, sir.
- 8 Q And how much was Mr. Centinello paid?
- 9 A I don't remember. I think it was, like, \$10,000 a month.
- 10 Q In October and December, January, how much time would you say you spent
11 working on DataPeer, like, hours a month?
- 12 A I don't know, sir.
- 13 Q Would you say --
- 14 A It was pretty busy.
- 15 Q Well, so -- because, at that time, you were working for AMMC, DataPeer,
16 and the campaign, correct?
- 17 A Yeah. I didn't sleep much, sir.
- 18 Q But even with sleep, there's still 24 a day. So I'm trying to get a sense, was
19 DataPeer a demanding role for you, handling the invoices for DataPeer?
- 20 A No, sir.
- 21 Q Okay. So is it fair to say you didn't spend a lot of time working on
22 DataPeer?
- 23 A That is -- that is fair to say. I didn't spend a lot of time working on
24 DataPeer.
- 25 BY [REDACTED]

1 Q Who set those salaries that you just told us?

2 A Alex Cannon and myself.

3 Q Okay. And did anybody have to approve them at the campaign?

4 A I am not sure.

5 Q Well, I mean, when you guys submitted, I guess, invoices, did you just decide
6 how much you were going to charge per month, or did somebody at the campaign have
7 to approve those amounts? Or was it you receiving the invoice, approving it -- which,
8 I'm half-joking.

9 A Okay. Yeah, I was about to say, anytime an invoice came in, it had to be
10 approved. But on that, for DataPeer, the understanding was going to be, the list broker
11 for the campaign and continued would be a percentage. So it was, the profit from
12 DataPeer was set up to be Mr. Cannon and my salary.

13 Q Right. But that presumed that you warmed up the IPs and had a list to
14 broker, which I don't know that you ever got there.

15 So, at the time that you had these salaries of 30, 30, and 10 before the lists were
16 sellable, who approved those numbers, or who said, yes, we will pay you for the setup
17 process to get to where you could broker the lists?

18 A Well, the campaign agreed to it.

19 Q And who at the campaign?

20 A Justin Clark and Bradley Crate.

21 Q Okay.

22 BY [REDACTED]

23 Q Now, are you familiar with Iterable, the company that sent the emails on
24 behalf of DataPeer?

25 A Yes, sir.

1 Q And you were on emails -- we reviewed emails with you, Alex Cannon, and
2 Darren Centinello and representatives from Iterable regarding approving emails to be
3 sent to the public to multiple email addresses.

4 Can you tell us a bit about what you recall that process to be, as to what Iterable
5 did and how the approval process worked?

6 A So -- and I don't know if you guys can see it. When you asked me my time
7 and how much time I spent on working with DataPeer, I was a little delayed in some
8 invoices. I was not focusing on DataPeer so much. I had a lot of stuff going on.

9 And so I did not understand or know the entire scope of the reasoning behind
10 Iterable's request, but I remember Alex Cannon asking Darren one time if he's reached
11 out to Iterable's legal counsel to review the email copy.

12

BY [REDACTED]

13 Q You may have answered this a moment ago, and I'm just trying to ask it in a
14 time-condensed way, but was it your understanding that they were basically using
15 DataPeer and Iterable to move email addresses off of the Salesforce account that the RNC
16 had and move them onto a list that the Trump campaign had control of?

17 A So there was no -- the RNC had the list in Salesforce, right, and there was
18 no -- essentially, and I think we discussed it earlier, that -- I just don't know if we did or
19 not -- but the RNC was using Salesforce, and there was no vehicle for the campaign to
20 have its own email list to be able to broker it later on, which is a pretty common thing
21 within politics.

22 And at the end of the campaign, if there was debt, it would be able -- we would be
23 able to pay for that debt by brokering the list. The list brokering, because it is the entity
24 itself, the campaign -- the receiver of the fund from brokering the list is the campaign.

25 Q Right.

1 A So it's not anybody else. So that was the purpose of it, because there was
2 no other means to do email brokering --

3 Q Right. And the way that other witnesses explained it to us -- and you tell
4 me if you agree or disagree -- is, it was problematic for the entire list to be in the RNC's
5 account at Salesforce because those were largely Trump donors, and if the relationship
6 dissolved, the Trump campaign didn't have access to what it had essentially built, which
7 was this email list, and they wanted to move it and duplicate it in DataPeer, using Iterable
8 to warm up the IPs.

9 Is that accurate?

10 A That is correct. And that discussion of DataPeer started when -- July 2020
11 with Brad Parscale, because he was the only one that could've had access to the list.
12 And it's something solid with Brad Parscale and RNC. There was no other way to access
13 or broker that list.

14 Q And so it sounded like these conversations started; DataPeer gets created, I
15 think, not until October 2020, correct?

16 A It was September, October. It was definitely later on.

17 Q And you guys weren't really doing anything. And then it's almost like
18 somebody woke up and was like, "Oh, my gosh, we need to warm up these IPs and move
19 these emails over onto this list."

20 A Yes.

21 Q Do you remember what --

22 A I think --

23 Q Go ahead.

24 A -- at that time period, because if the RNC -- you know, I mean, the election's
25 pretty near from October, and it's impossible just to move it from the RNC at Salesforce in

1 1 day.

2 Q Do you remember what triggered, like, the initiation of the moving?

3 Because you set up the entity in, like, September, October, but you don't actually start
4 the Iterable relationship until November. So what triggers the, "Oh, guys, we gotta get
5 on top of this now" moment?

6 A I think there was -- not "I think." There were some issues with having the
7 RNC give us access to the list and moving it from Salesforce.

8 Q Who told you that?

9 A That there were issues with it?

10 Q Yeah.

11 A I don't remember if I was on an email or if it was Alex Cannon telling me
12 that.

13 Q Okay. But somebody made you aware of the concerns of, there's issues
14 with the RNC list, we need to get these emails moved stat?

15 A It was -- I mean, it was an issue of the campaign not having control over its
16 own list, yes.

17 Q Okay.

18 Do you want to jump back in?

19 [REDACTED] Yeah.

20 BY [REDACTED]

21 Q So, Mr. Dollman, when we look at the variety of documents that we've
22 received, what we see is that Iterable is looking at copy, email copy, that DataPeer is
23 seeking to send out on its platform and providing a variety of changes, because it sees the
24 copy that's coming from TMAGAC as either unnecessarily violent in tone or misleading as
25 it speaks to the 2020 election.

1 Do you recall those back-and-forths with Iterable?

2 A I don't recall, but I do know it was flagged for not being within their terms
3 and conditions, I believe, for Iterable.

4 Q And is that because it had some of the tones and the emails from TMAGAC
5 was seen as violent in nature, potentially?

6 A I don't know the full reasoning, whether it was violent in nature or not, but
7 I -- that was mainly Alex Cannon handling that with Iterable.

8 Q I'm going to show you exhibit 25. We'll just look at some examples quickly.
9 In exhibit 25, this is November 7th, and it's an email that -- it's a proof of email
10 sent for approval from Iterable.

11 And, if you scroll up -- and here, Seth Charles is -- do you know him to be a
12 representative from Iterable? Do you recognize that name, Seth Charles?

13 A I don't recognize the name, but the legal counsel for Iterable, I would think.

14 Q Okay. And then you see Sarah Gounder, who I think is actually the legal
15 counsel, and Mr. Charles is more the relationship guy.

16 A Okay.

17 Q But he says to Mr. Centinello: "Hi, Darren. Thanks for reaching out. I
18 would advise that 'We are keeping up the fight against the Democrats on a fair election
19 but we can't do it without you' could be edited to, 'We are keeping up the fight for a fair
20 election.'"

21 And he says, "Again, this comes in chorus with less inflammatory language that
22 could be misleading as accusatory or assuming intent upon a particular population."

23 So this is the kind of edit you were talking about that Iterable was making to make
24 the DataPeer emails in line with the terms and conditions, correct?

25 A Yes, sir.

1 Q I'm going to show you what's exhibit 26. And, again, this is another email
2 where Mr. Charles offers additional edits to a TMAGAC email, where he says to
3 Mr. Centinello, again copying you and Mr. Cannon, he says, "For the most part, I think this
4 would be fine, but I'm fairly confident 'When they come after me, they're really coming
5 after you and everything you stand for' would get flagged. I'd recommend looking for
6 modified copy there to be a little less threatening."

7 And then I'm going to show you another email in exhibit 27, which is a few days
8 later on November 11th. And at the top of this email, Mr. Charles again says, you know,
9 that in -- it says, "For the most part, it looks okay, although this copy would need further
10 adjustments."

11 And it says -- it has a quote from the email that says "only to see the leads
12 miraculously disappear as the days went by. Perhaps these leads will return as our legal
13 proceedings move forward, but only if we have the resources to keep fighting." And he
14 says, "This obviously insinuates the so-far-unsubstantiated theory of voter fraud, as well
15 as contribution to legal actions will result in some sort of different outcome."

16 [REDACTED] coughing.]

17 [REDACTED] Can you take over?

18 [REDACTED] Oh. Yeah.

19 BY [REDACTED]

20 Q So did you have any conversations with Mr. Cannon about the responses
21 that Iterable was giving in terms of pushback against the language of the emails?

22 A No, I don't believe I had any conversations with Mr. Cannon about the
23 pushback from Iterable. But I do recall him saying that they were working with Iterable
24 counsel.

25 Q And were you present for any conversations with Mr. Centinello or, actually,

1 anyone else regarding the difficulties with getting some of the copy through Iterable?

2 A I think they were working with Iterable to make sure that they stayed within
3 their terms and conditions, but no one said anything of having difficulty with Iterable that
4 I can recall.

5 Q But correct me -- and I'm sorry -- a moment ago, did you say Mr. Cannon did
6 say something to you about the difficulty of getting stuff -- or, you said he was working
7 with Iterable's counsel to get things through?

8 A That's correct, to stay within their terms and conditions.

9 Q Did Mr. Cannon ever express concerns to you regarding the fact that -- well,
10 let me back up for a second.

11 Did you ever hear from Mr. Cannon or Mr. Centinello that they were taking the
12 most watered-down copy from the RNC copywriters and that watered-down version
13 wasn't getting through Iterable?

14 A No, I did not know it was the most watered-down copy.

15 Q Okay.

16 A And I didn't know where they were getting their copy from.

17 Q Oh, they never discussed with you where those emails were coming from?

18 A I don't recall a discussion of where they were getting it.

19 Q Okay.

20 And did you ever have any conversations with Alex Cannon, Mr. Centinello, or
21 anyone else regarding concerns that a second email vendor was basically refusing to send
22 out these emails without significant revisions?

23 A No, ma'am. Again, this wasn't my lane and I didn't really jump into it too
24 much, and they didn't have that conversation with me.

25

BY [REDACTED]

1 Q Is it fair to say you didn't have any involvement in DataPeer besides
2 approving Mr. Cannon's salary, Mr. Centinello's salary, and any payments that needed to
3 be made to Iterable?

4 A I mean, I spoke with Mr. Cannon about DataPier's, like, future and what it
5 would be providing as an email broker, so I wouldn't say it was only the comptroller side,
6 but that was my role during this time.

7 Q What I'm asking -- did you have any role in actually managing the
8 relationship with Iterable or getting those emails out?

9 A Not that I can recall. Darren was working with Iterable.

10 Q Were you reviewing these emails in real-time to see the changes that
11 Iterable was suggesting?

12 A No, sir.

13 Q Did you have any conversations with Mr. Cannon or Mr. Centinello about the
14 challenges in getting these emails through Iterable?

15 A I did not know there were any challenges. I just knew they were working
16 with Iterable.

17

BY [REDACTED]

18 Q So how --

19 A I didn't know there was a challenge behind it. I just knew they were
20 working with him.

21 Q So, back to my colleague's question. Aside from just approving the invoices
22 for payment, I mean, how -- it sounds like you had very minimal activity in DataPeer or its
23 role or in what it was actually doing. Is that fair?

24 A At this point in time, yes, ma'am.

25 Q At any point in time, did it get greater?

1 A No. As you guys probably already know, DataPeer did not continue as the
2 email list broker.

3 In the beginning of it, working with Alex Cannon, I set up the bank accounts, set up
4 everything, making sure that Iterable was in a place -- or, not Iterable -- DataPeer was in a
5 place to continue or do business. And then it -- my role was just invoices and the
6 comptroller side.

7 Q Yeah. So, if I understood the timeline right -- correct me if I'm
8 wrong -- you've got setup in October, operation in November, operation in December,
9 and then January 6th happens and you lose the -- everything gets shut down and the IPs
10 are dead, correct?

11 A In a summed-up way, yes, that's correct.

12 Q Yeah. So, if I understood you, a lot of the setup was probably in
13 October 2020, which was when you were active. Centinello and Cannon are handling
14 things in November and December, and then everything just closes down.

15 A That's correct.

16 Q Which actually takes us into January 6th. And we've asked everybody the
17 following questions.

18 I'm assuming you remember where you were on -- well, actually, some people
19 don't remember where they were. But do you remember where you were on
20 January 6th?

21 A Yes, I do.

22 Q And when did you become aware of the violence at the Capitol?

23 A I don't know how long into when it started, but I became aware that -- after
24 it already started.

25 Q Were you home? Were you at work?

1 A No, I was in the campaign office.

2 So [REDACTED] -- I got, you know, [REDACTED]

3 [REDACTED] so that was pretty

4 miserable. And then I returned back to the office, I think it was, like, the 5th or 6th.

5 And at that point in time, we had to close down the campaign office and turn it
6 back over to the building owner. And we had a security deposit with the building. So I
7 spent most of my time on the -- I don't remember if it was the 5th, but I do know the 6th,
8 I was patching drywall, sanding drywall, and painting in the campaign office.

9 Q Who else was present with you there, doing that with you?

10 A Alex Cannon. I believe Madison Slavel (ph) was there. And I don't recall
11 who was helping me with it.

12 Q And what was -- I guess, just tell me kind of, like, what happened on
13 January 6th when you saw the violence. What did you think? What was your
14 impression? What was your reaction?

15 A I didn't really have much of a reaction. I just saw it on the TV. And there's
16 a lot of things -- I just kind of ignored it and went back to patching drywall. And I didn't
17 realize the scope of it.

18 Q When did you realize the scope of it?

19 A Probably after the fact. The next day, there was a lot more, like, airtime on
20 it. I mean, not saying it wasn't that day, but I was still working in the office and the TVs
21 were still on.

22 Q There were several witnesses on January 6th who worked for the campaign
23 or the administration who either resigned or considered resigning as a result of what
24 happened. Did you consider resigning at all, or did it have any impact on you?

25 A No, ma'am, I didn't consider it.

1 Q Did it have any impact on you, other than watching it on television?

2 A No, ma'am.

3 Q Okay.

4 There are a couple of entities that I just want to run through and just see if you
5 recognize them by name. These are entities that have received payments from Save
6 America. And I understand there's countless entities that have received payments, but
7 to the extent that you know of any individuals associated with these entities, can you just
8 tell me if you're familiar with them and who you know them to be associated with.

9 Have you ever heard of Hudson Digital, LLC?

10 A Yes, ma'am.

11 Q And do you know who's associated with that entity?

12 A I can't think of them off the top of my head.

13 Q Okay.

14 Pericles, LLC?

15 A Yes, ma'am.

16 Q And do you know who's associated with that entity?

17 A I don't know their names either.

18 Q High Ground Strategies?

19 A I do know of them. Again, I don't know who runs them.

20 Q And what about Ocean Point Advisors, LLC?

21 A Same. I know of the company, but I can't recall who runs it.

22 Q To your knowledge, are any of those legal entities, like, legal providers?

23 A Not to my knowledge, no, ma'am.

24 Q Who would've approved their invoices for payment from Save America?

25 Do you know?

1 A Susie Wiles.

2 Q Okay.

3 Mr. Dollman, we ask this of all -- well, nearly all of the witnesses, but has anybody
4 offered to pay your legal fees for your involvement with the January 6th Committee?

5 A No, ma'am.

6 Q Okay. And, just to be clear, nobody else is paying your legal fees that you
7 know of?

8 A No, ma'am.

9 Q Okay.

10 [REDACTED] Has anyone tried to discuss the content of your testimony
11 before the committee with you?

12 Mr. Dhillon. Other than legal counsel. You're asking for questions other than
13 consulting with legal counsel. Is that correct?

14 [REDACTED] Yes. Thank you.

15 [REDACTED] Correct.

16 [REDACTED] A hundred percent.

17 Mr. Dollman. I apologize, sir. Can you say it again?

18 [REDACTED] Has anyone attempted to discuss the content of your
19 expected testimony with the committee with you?

20 [REDACTED] Other than your legal counsel.

21 [REDACTED] Other than legal counsel.

22 Mr. Dollman. Other than legal.

23 Mr. Dhillon. Other than any lawyer.

24 Mr. Dollman. No, nobody.

25 [REDACTED] No, no, no, no, no.

1 [REDACTED] No, no.

2 [REDACTED] Not any lawyer. Your counsel, the lawyers that you have
3 representing you. Other than your lawyers, has anybody tried to discuss your testimony
4 here with you?

5 Mr. Dollman. No, ma'am.

6 [REDACTED] Okay.

7 Give us one second. We're going to just make sure -- we're trying to wrap it up
8 quickly.

9 [Discussion off the record.]

10 [REDACTED] All right. Mr. Dollman, we're going to stop here. We're
11 going to stop here. Thank you for taking out the time. We want to get you on the
12 road.

13 And to the extent we have any other questions, we'll reach out to your lawyer and
14 do that, but we want to make sure that you can make your flight, so I think this is a good
15 stopping point.

16 So thank you. It is good to see you again. Thank you for taking out the time.

17 Mr. Dollman. Thank you. Have a great rest of the day.

18 [REDACTED] Thank you all.

19 Without objection, we'll stand in recess, subject to recall of the chair.

20 [Whereupon, at 4:27 p.m., the interview was recessed, subject to the call of the
21 chair.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date