

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: September 17, 2021 8:12 PM FILING ID: E9E5DD591D201 CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 ccain@cstrial.com Steve Skarnulis, No. 21PHV6401 skarnulis@cstrial.com Bradley A. Kloewer, No. 50565 bkloewer@cstrial.com Zachary H. Bowman, No. 21PHV6676 zbowman@cstrial.com CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011/512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809 trey@rklawpc.com Mark Grueskin, No. 14621 mark@rklawpc.com Andrew E. Ho, No. 40381 andrew@rklawpc.com RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900/303-446-9400 (Fax)</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">EXHIBIT R DECLARATION OF MARTY GOLINGAN</p>	

<p>DISTRICT COURT, DENVER COUNTY, COLORADO 1437 Bannock Street Denver, CO 80202</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>ERIC COOMER, Ph.D., Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants</p>	
<p>Attorneys for Plaintiff Charles J. Cain, No. 51020 <u>ccain@cstrial.com</u> Steve Skarnulis, No. 21PHV6401 <u>skarnulis@cstrial.com</u> CAIN & SKARNULIS PLLC P. O. Box 1064 Salida, Colorado 81201 719-530-3011 Telephone 512-477-5011 Facsimile</p> <p>Thomas M. Rogers III, No. 28809 <u>trey@rklawpc.com</u> Mark Grueskin, No. 14621 <u>mark@rklawpc.com</u> Andrew E. Ho, No. 40381 <u>andrew@rklawpc.com</u> RechtKornfeld PC 1600 Stout Street, Suite 1400 Denver, Colorado 80202 303-573-1900 Telephone 303-446-9400 Facsimile</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p style="text-align: center;">DECLARATION OF MARTIN GOLINGAN</p>	

I, Martin Golingan, declare and state as follows:

1. My name is Martin Golingan. I am over the age of twenty-one years, am of sound mind, and am fully competent to make this Declaration. I have personal knowledge of the matters stated in this Declaration, which are true and correct.

2. I graduated from Palomar College in San Marcos, California in 2015, with an Associates of Arts degree in Digital Broadcasting Arts.

3. From August 2013 through December 2015, I was a sports reporter for Prep Sports Live – PCTV. During this time, I was also a production assistant for CBS Radio, a news director for North County News, a music director for KKSM-AM, and a news writer/production assistant with KUSI Television.

4. In September 2016, I began my career at Herring Networks, Inc. dba OAN (OAN) as a news writer and was promoted to senior news producer in January 2017. At the time of my termination on April 19, 2021 by OAN, my title was senior news producer. As a result of my nearly five-year employment by OAN, including producing countless hours of programming, I became intimately familiar with how the newsroom in San Diego and how the OAN organization were run. At one point, I was producing the 12pm, 2pm, 3pm OAN shows, and was helping other producers with their shows when not producing my own.

5. OAN is controlled by the “Hs.” The “Hs” is a reference to Robert Herring and his sons, Charles Herring and Bobby Herring. Based on my experience at OAN, management’s news coverage decisions are based on a business model, not a journalistic model. The theory was that any news report that increased OAN’s visibility was

acceptable and, therefore, broadcast whether or not it was factual. Unlike most news organizations where reporters, producers, and newsroom managers work together to develop news content and network/station owners and sales and operations staff take a hands-off approach, content and editorial decisions came from the top down at OAN. The stories the Hs wanted to run were run. These were referred to by the OAN news director as “H stories.” Thus, despite being part of the ownership of OAN, Charles Herring was directly involved in making decisions on what news stories to run and who would run them. There was no separation between ownership and news.

6. The Hs’ decision-making on on-air content became very reliant on viewer feedback as the 2020 Presidential election neared. OAN has a web-based feedback link to solicit viewer feedback and opinions. Whatever the viewers liked, the management told production to “run more of that.” There was a caving to the mob mentality where the OAN news plan was to reinforce the viewpoint of the viewer to increase viewership and challenge Fox News and Newsmax for conservative content viewers. To be clear, this was a top-down directive.

7. For example, attached to my declaration are true and correct copies of OAN internal emails sent to me while I was employed by OAN as a news producer. These emails are labeled Exhibit A through Exhibit E. Exhibit D is an example of when Charles Herring responded to a viewer’s ridiculous claim that the death of Ashli Babbitt during the storming of the Capitol on January 6th was a staged operation played by Antifa actors and that Ashli Babbitt was actually still alive. In response to this viewer’s claim, Charles

Herring stated, “If they FAKED a killing on Jan 6th, this would be worth covering as it shows advanced planning.”

8. Exhibit E is another example of a viewer asking OAN on March 1, 2021 to not refer to former President Trump as “former President Trump” since he was “still the duly elected President.” In response, OAN’s news director, Lindsay Oakley advised all OAN producers, including me, to “Please remember to not say FORMER president trump... I’m still noticing people writing this in scripts and packages.” This directive was given almost four months after the Presidential election and almost two months after the U.S. Capitol was stormed. In fact, on the day the Capitol was stormed by Trump supporters, OAN’s news director advised all producers, writers, and anchors as follows: “Please DO NOT say ‘Trump Supporters storm Capitol’... also DO NOT call them rioters. You can also call the event a demonstration or protest... DO NOT CALL IT A RIOT!!!”

9. OAN was considered a pro-Trump station during the lead-up to the 2020 Presidential election. OAN covered Trump rallies in full and to my knowledge was the only station doing that after a while. OAN soon became the “Trump Station.” That is the brand that OAN wanted to take on. The Hs’ directive was to “Run Trump in everything that we do.” For four years of Trump’s administration, OAN would cover Trump daily and write about the public’s reaction. Former President Trump was the star of the show and we would write everything around that. When former President Trump said that the election was stolen, the viewer feedback was incredible. As a result, OAN continued to air pieces after the election to support this narrative.

10. For example, when Arizona was called, OAN's electoral map showed that fact, and viewers were complaining that the election "wasn't done yet." There was a backlash about the Arizona results, so when the anchors were reading off voting numbers, the Hs pushed back about Arizona being called. Shortly after the election, OAN producers were instructed by the OAN news director: "Please do NOT refer to Biden as 'President-elect'.... electoral votes will not be official until December 14th and we are awaiting lawsuits." *See Exhibit A.*

11. Charles Herring dealt directly with the Washington D.C. and New York reporters, including Chanel Rion. He would often issue directives to reporters about what stories he wanted to see on air. This was common knowledge within OAN. In this regard, Charles Herring was directly involved in the decision to run Chanel Rion's segment called "Dominion-izing the Vote," which began to be run on or about November 21, 2020 and is still posted on YouTube. This report was recorded outside of the San Diego newsroom by Ms. Rion and her cameraman in Washington D.C. Once it was completed, it was sent to San Diego as an "H story." We were told to run that report even though it was not fact checked by staff. Chanel Rion wrote her own scripts, and no doubt wrote this piece. One or more of the Hs would have previewed this special before it aired. I distinctly remember seeing a person who I now know to be Ron Watkins in a cowboy hat being interviewed by Ms. Rion in an interview that aired about a week prior to the "Dominion-izing the Vote" special report. This interview was replayed as part of the special report and is a good example of Ms. Rion failing to verify the credibility of her sources. Mr. Watkins is widely associated with QAnon. Further, as I stated, this piece was not fact checked by staff and

given the lack of credibility of Ms. Rion's sources, it should never have aired. The segment was simply required to be run since it was already approved by the Hs. In the past, when I expressed my concerns with false stories being run at OAN, I would bring my concerns to the news director and would email the Hs at the same time. Usually, I did not receive a response. In this case, I do not recall if I sent such an email but, if I did, I have no doubt it would have been ignored.

12. I considered the original reporting out of DC to be "weird" and often the stories were not fact checked. The Hs would simply see a headline they liked and if it fit their narrative, they would run with it. Several producers, including myself, would see these H stories, many of which were written by Kristian Rouz, and would try to bury them because they were not truthful and not true to journalism standards. Producers, including myself, would put these pieces into a show but then "float" the pieces so they would not air. Thereafter, we would do our best to make it appear like the piece had actually aired.

13. Kristian Rouz would often complain to Hs about producers not airing his stories. Whoever was producing a show would get in trouble for not airing his stories even though many of us, including myself, knew he was peddling disinformation and falsities. Mr. Rouz was thought of as a "shadow producer." Mr. Rouz previously worked for Sputnik and was hired by OAN a couple of years after I was. Mr. Rouz's stories were fringe right, extremist stories, including praising white nationalist narratives. Our news group discussed the fact that Mr. Rouz went to school at a Siberian college that reportedly trained Russian operatives for the Kremlin. Mr. Rouz is one of the main reasons many

producers and writers have left OAN and yet the Hs required producers to run his fringe pieces over their objections.

14. Attached to my declaration as Exhibit C is an email from Lindsay Oakley to all news producers, including me, dated January 14, 2021. This email followed a staff meeting that I attended. The email references getting “H stories’ in ASAP and making sure they air for the full 8 hours or more.” This means that we were to run H stories each hour for eight consecutive hours. These stories were to be kept “under the black line,” meaning that they would not be trashed and, instead, they would be run as filler the next day. This was typical of the priority being given to H stories such as the “Dominionizing the Vote” story. Likewise, the email discusses the fact that Kristian Rouz stories were being “thrown away.” This was occurring because the news producers knew his content was disinformation and because producers did not trust him. We were also told as producers to check Gateway Pundit and similar questionable sources to find content to be aired on OAN.

15. To be clear, many original stories from OAN were sourced and done by the book with standard journalistic practices. Many producers and writers in San Diego were ethical and knew how to fact check stories that were to run on air. These standards, however, did not apply to Kristian Rouz, Pearson Sharp, and Chanel Rion, among other “untouchables.” As producers, we were forced to run their reports without any fact checking or vetting of sources. We were told that the Hs had approved the story and it was to run no matter what. We were not told who or what their sources were or where they got their information.

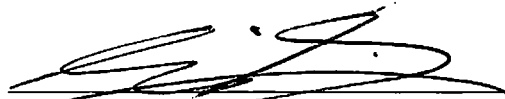
16. I understand Charles Herring has sworn in a declaration that he has discussed the Chanel Rion “Dominion-izing the Vote” with his staff as well as OAN as an organization. If he did so, he did not do it in my presence or in the presence of any other news producers in San Diego to my knowledge. My last day at OAN was Monday April 19, 2021. On that day, I was told by Bobby Herring that I was being discharged “at will.” In my opinion, I was fired from OAN in retaliation for speaking to a New York Times reporter, Rachel Abrams. Ms. Abrams had her personal cell phone number doxed by OAN after I spoke to her on the record. When I was terminated, I signed a document given to me by OAN that acknowledged that I was being terminated and another document acknowledging that I had received my final paycheck. OAN also tried to get me to sign a nondisclosure agreement, but I refused.

17. Based on my experience at OAN, I know for a fact that we aired false stories. The “Dominion-izing the Vote” report is a good example of one of those. Based on my observations, OAN ran stories like “Dominion-izing the Vote” with reckless disregard for the truth. When Dominion sent OAN a cease-and-desist letter after this report aired, I recall the Hs being thrilled to receive it. In their view, all publicity, even so-called bad publicity, was good for OAN. The Dominion demand letter changed nothing at OAN. It had the opposite effect.

18. Pursuant to C.R.S. § 13-27-101, *et. seq.*, I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

Further Declarant sayeth naught.

Executed on the 20th day of May 2021 at San Diego, California.


Martin Goling, Declarant

DISTRICT COURT, DENVER COUNTY,
COLORADO
1437 Bannock Street
Denver, CO 80202

ERIC COOMER, Ph.D.,
Plaintiff

vs.

DONALD J. TRUMP FOR PRESIDENT,
INC., et al.,
Defendants

▲ COURT USE ONLY ▲

Attorneys for Plaintiff

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Denver, Colorado 80202

303-573-1900 Telephone

303-446-9400 Facsimile

Case Number: 2020cv034319

Division Courtroom: 409

EXHIBIT A

From: Lindsay Oakley <Lindsay.Oakley@oann.com>

Sent: Monday, November 9, 2020 4:17 PM

To: OANN Producers <Producers@oann.com>; OANN Writers <writers@oann.com>; OANN Anchors <Anchors@oann.com>

Subject: Reminder!!!

Please do NOT refer to Biden as 'President-elect' electoral votes will not be official until December 14th and we are awaiting lawsuits.

Thank you!!!!

Lindsay Oakley
News Director



One America News Network
Office: (858) 270 – 6900 ext. 150
Cell: (619) 381-9300

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COLORADO
1437 Bannock Street
Denver, CO 80202

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EXHIBIT B

From: Lindsay Oakley <Lindsay.Oakley@oann.com>
Sent: Wednesday, January 6, 2021 3:51 PM
To: OANN Producers <Producers@oann.com>; OANN Writers <writers@oann.com>; OANN Anchors <Anchors@oann.com>
Cc: Chris Schickedanz <Chris.Schickedanz@AWETv.com>
Subject: Capitol Hill News

Please DO NOT say 'Trump Supporters storm Capitol'... refrain from labeling the protesters as from one side or the other. Simply call them demonstrators or protesters... also DO NOT call them rioters. You can also call the event a demonstration or protest... DO NOT CALL IT A RIOT!!!

I've also been seeing a lot of different CG banners... they've been all over the place.... So -- CGs should have a red 'CAPITOL HILL' banner.

The electoral college certification is supposed to restart later tonight... so my previous email still stands as the plan. There needs to ALWAYS be an anchor and a director up there and a show should be dragged for each hour (see previous email).

Call or text me if you need guidance.

Thank you!!!

Lindsay Oakley
News Director



One America News Network
Office: (858) 270 – 6900 ext. 150
Cell: (619) 381-9300

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<p>EXHIBIT C</p>	

From: Lindsay Oakley <Lindsay.Oakley@oann.com>

Sent: Thursday, January 14, 2021 3:19 PM

To: OANN Producers <Producers@oann.com>

Subject: Notes From Meeting

Here is what we discussed during the meeting today –

- Mr. H says you are all doing great – ratings were best ever last week – keep up the good work!!
- Ivan discussed editor/broll issues... we will be sending a check list for writers to use when looking for broll for a story. (standby for further information and details or ask a producer on your shift about what we discussed.)
- We discussed getting 'H stories' in ASAP and making sure they air for the full 8 hours or more – there needs to be better decision making when killing stories with older slugs and putting in new stuff.
 - We would rather see H stories, political/DC packages than another Reuters, COVID vaccine package just for the sake of it being new.
 - We have a new section under the black line for 'H stories/DC Packages' – instead of throwing these types of stories away in the middle of the night (even if they aired 8 hours)... put them in this section to air in the morning or afternoon.
 - Try not to focus too much on slug times... but rather the quality of the content.
 - Be aware of story scripts vs. slug times.... Sometimes a story says 'reports Tuesday' (even though its Thursday) and the slug says TH7AM --- **THIS IS OBVIOUSLY AN OLD STORY AND SHOULD BE TREATED AS SUCH... DON'T BE FOOLED BY THE SLUG TIME.**
- Pull back on COVID vaccine stories and international or 'don't care' Reuters packages and stories.
- We went over weekend story data gathered by Taylor... and reiterated the need to get new content and more stories in during weekend shows

Kristian Rouz stories are being thrown away WAYYYY too much and I will start issuing write ups for whoever is responsible. We have so many old stories all weekend but for some reason as many as 5 of his stories are thrown out sometimes. Please make sure his stories air at least 8 hours and treat them almost like H stories... he is a great writer and has a conservative voice which gets lost sometimes on the weekend. We should be encouraging and excited to add his content to the rundown. Also... Minimize any changes made to his scripts.

- Beware market wrap packages every night... Conway Gittens sucks!!!! We don't need to air them every night also don't slam Tesla
- We went over Inauguration coverage plans – we are not covering it -- and after Jan 20 the CG banners

will be red and say 'WHITE HOUSE'

Copyediting needs to improve – the shift after you should not have to check your work... or retrack packages because of errors... they should be focusing on getting new content in the show. I will also start writing producers up for this.

- C block is still WAYYYYYYYY too long on the weekends (especially at night) please stop slugging C block stories unless they are very important and have a U.S. angle. I cant count how many times I've said this.. again... I will start issuing write ups. We need to make sure writers (since there are fewer) on the weekends are focusing on A and D block stories... if you don't slug C and E... then they cant write it and will be forced to do more important stories.
- You can also assign writers to stories ESPECIALLY if they are important stories and no one is signing up for them. You guys will ultimately take the blame for not getting major stories in the show in a timely manner.. so you need to take control and tell writers what to do.
- **ADD NEW STORIES TO SHOWS EVEN AFTER THEY ARE DRAGGED OVER...** I haven't really been seeing anyone do this and its making the shows boring and repetitive.
- **DON'T PUT EVERGREENS IN THE MASTER...** only add them to individual shows. Its ok if the master is under 10 minutes and you know you are adding a few evergreens.
- Get creative with the rundown... put covid stories in the C or E... put DC political stories in the C or B... don't feel tied down to "B=National, C=international and E=tech or fluff" ... I want the shows to look different... so MIX IT UP!
- Check Gateway Pundit, Epoch Times and The Blaze right when you get in... these are very helpful to find good OAN content when slugging.

***** **I want you all to start reporting back to me more.** If a writer is constantly late to their shift, not pulling their weight, not fulfilling their in-house package quota or consistently making errors... I need to know so I can take action and help them improve. You are their supervisors and my eyes and ears when I'm not here... so please keep me in the loop on everything... it's not tattle-tailing... it's holding people accountable. I also want to know when people are doing well or going the extra mile... they should be recognized for their great work too. We are all a team and I want everyone in the newsroom to be happy... feel like they are part of the team and grow in their positions. SEND ME AS MANY EMAILS, TEXTS, WRITTEN NOTES ETC. AS YOU WANT... it does not bother me and I appreciate the communication.

Oh also... tomorrow is Salina's last day here at OAN.. she's going to FOX and Friends in NYC... congrats Salina! We will miss you!!!!

Feel free to 'reply all' to this email if I forgot anything.

Thank you!!!!

Lindsay Oakley
News Director



One America News Network
Office: (858) 270 – 6900 ext. 150
Cell: (619) 381-9300

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<p>EXHIBIT D</p>	

From: Charles Herring <Charles@oann.com>
Sent: Thursday, February 11, 2021 12:13 PM
To: DCNewsReport <DCNewsReport@oann.com>; John Hines <John.Hines@oann.com>; Christina Bobb <Christina.Bobb@oann.com>; Chanel Rion <Chanel.Rion@oann.com>; Jack Posobiec <Jack.Posobiec@oann.com>; Richard Pollock <Richard.Pollock@oann.com>; Jenn Pellegrino <Jenn.Pellegrino@oann.com>
Subject: FW: One America News Network Contact Form

If they FAKED a killing on Jan 6th, this would be worth covering as it shows advanced planning.

-----Original Message-----

From: Doc Martin <donotreply@oann.com>
Sent: Thursday, February 11, 2021 12:09 PM
To: Contact <contact@oann.com>
Subject: One America News Network Contact Form

To:
One America News Network

Name:
Doc Martin

Email:
markmartin4747@yahoo.com

City:
Mardela Springs

State/Province/Region:
Maryland

Zip/Postal Code:
21837

Age:
35-49

Sex:
Male

Service Provider:
OTHER

Income:
Prefer not to disclose.

Message:

Great News, Ashli Babbitt is Alive and Well. Shooting at the Capitol was a Staged Operation Played by Antifa Actors. Recorded by Jayden X.

aka John Sullivan, who is self proclaimed Antifa "Film-Maker". "The Shooter" is also an actor who fired BLANK shot. I have more, if you interested.

DocMartin

Akismet Spam Check: passed

Sent from (ip address): 172.31.78.2

(ip-172-31-78-2.us-west-1.compute.internal)

Date/Time: February 11, 2021 12:09 pm

Coming from (referer): <https://www.oann.com/contact/> Using (user agent): Mozilla/5.0 (Linux; Android 10)

AppleWebKit/537.36 (KHTML, like Gecko) Version/4.0 Chrome/88.0.4324.152 Mobile

DuckDuckGo/5 Safari/537.36

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EXHIBIT E

From: Lindsay Oakley <Lindsay.Oakley@oann.com>
Sent: Monday, March 1, 2021 10:22 AM
To: OANN Producers <Producers@oann.com>; OANN Writers <writers@oann.com>
Subject: FW: One America News Network Contact Form

Please remember to not say FORMER president trump... I'm still noticing people writing this in scripts and packages.
Thank you!

Lindsay Oakley
News Director

One America News Network
Office: (858) 270 – 6900 ext. 150
Cell: (619) 381-9300

-----Original Message-----

From: Wayne Krantz <donotreply@oann.com>
Sent: Monday, March 1, 2021 4:44 AM
To: Contact <contact@oann.com>
Subject: One America News Network Contact Form

To:
One America News Network

Name:
Wayne Krantz

Email:
waykragat@aol.com

City:
West Columbia

State/Province/Region:
South Carolina

Zip/Postal Code:
29169

Age:
50+

Sex:
Male

Service Provider:
DIRECTV

Income:
\$100,000+

Message:

I let AT&T and Directv know that if they cancel my ability to view OAN, I will drop all services with them immediately. I support you 100%. Please don't say "former President Trump" as he is still the duly elected President and deserves that recognition. USA1st.

Akismet Spam Check: passed

Sent from (ip address): 172.31.77.243

(ip-172-31-77-243.us-west-1.compute.internal)

Date/Time: March 1, 2021 4:44 am

Coming from (referrer): <https://www.oann.com/contact/> Using (user agent): Mozilla/5.0 (Windows NT 6.3; Win64; x64)

AppleWebKit/537.36 (KHTML, like Gecko) Chrome/88.0.4324.190

Safari/537.36