

FILED UNDER SEAL SUBJECT TO 03/27/2023 PROTECTIVE ORDER

**IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS
DOMESTIC RELATIONS DIVISION**

LUNDEN ROBERTS

PLAINTIFF

V.

CAUSE NO. 32DR-19-187-2

HUNTER BIDEN

DEFENDANT

**MOTION TO EXCLUDE AND DISQUALIFY GARRETT ZIEGLER AS EXPERT
WITNESS, MOTION FOR SANCTIONS, AND PETITION FOR TEMPORARY
RESTRAINING ORDER**

Hunter Biden, Defendant, files his Motion to Exclude and Disqualify Garret Ziegler as Expert Witness, Motion for Sanctions, and Petition for Temporary Restraining Order, and respectfully states as follows:

A. Background

A-1. Lunden Roberts (“Plaintiff” herein), in her April 14, 2023, Supplemental Answers to Interrogatories, declared her intent to call Garrett Ziegler (“Ziegler” herein) as an expert witness. Plaintiff intends Ziegler to testify on the following matters: “Hunter Biden, his financial condition, economic analysis of his accounts and transactions based on documents provided during discovery and the contents of Hunter Biden’s laptop abandoned in Delaware, and publicly available information.” *See Exhibit “1”*.

A-2. Although no curriculum vitae was produced as requested for any expert identified, Ziegler’s history is very well “documented” in the social media world in which he resides and, however else he might be characterized, an “expert” on anyone’s financial condition would not ever be one. Ziegler is 27 years old and has a Bachelor of Science in Economics from St. Louis University, awarded May 2018. He does not have a postgraduate degree in, nor any other substantial education, training, or experience in accounting, finance, taxation, or any other applicable field.

A-3. Ziegler's only notable work experience was as a White House aide in the now-defunct Office of Trade and Manufacturing Policy (OTMP) under Peter Navarro (currently pending trial for charges of criminal contempt of Congress) during the Trump administration,¹ where he wrote reports on election fraud, domestic manufacturing, the "pandemic response" (insinuating that the COVID-19 pandemic was a conspiracy), counterfeit goods, and trade.² He has no work experience as an accountant or finance expert of any kind.

A-4. Ziegler has never testified (not even likely served) as an expert witness in any other proceedings. With respect to the public record, he has never testified as an expert witness in any other proceedings. He has otherwise only testified as a fact witness in one other proceeding, the July 18, 2021, hearing in front of the U.S. House Select Committee to Investigate the January 6th Attack on the United States Capital, for his role in a December 28, 2020, White House meeting. Reportedly on December 28, 2020, the aforementioned meeting took place between White House officials and outside Trump-affiliated parties, including the former national security advisor Michael Flynn, Sydney Powell, and former Overstock CEO Patrick Byrne.³ Reports by CNN and the New York Times reflect that during this meeting, the group discussed methods of overturning the 2020 election results, including declaring martial law and using an executive order to seize voting machines.⁴ Ziegler has taken credit for engineering this

¹ Josh Boswell, *Former Trump aide posts online a searchable database containing a huge trove of more than 120,000 emails from Hunter Biden's abandoned laptop, calling them 'a modern day Rosetta Stone of white and blue collar crime'*, Daily Mail, May 17, 2022, <https://www.dailymail.co.uk/news/article-10825801/Former-Trump-aide-posts-huge-trove-120-000-Hunter-Biden-emails-abandoned-laptop.html> (last accessed April 19, 2023)

² Garrett Ziegler, Biden Laptop Report, embedded video timestamp 3:10, <https://bidenlaptopreport.marcopolousa.org/> (last accessed April 19, 2023)

³ Jan. 6 Inquiry Subpoenas Navarro who Worked to Overturn election, <https://www.nytimes.com/2022/02/09/us/politics/peter-navarro-jan6-inquiry.html> (last accessed April 19, 2023)

⁴ Kevin Liptak *et al.*, *Heated Oval Office meeting included talk of special counsel, martial law as Trump advisers clash*, CNN, Dec. 20, 2020, <https://www.cnn.com/2020/12/19/politics/trump-oval-office-meeting-special-counsel-martial-law/index.html> (last accessed April 19, 2023)

meeting.⁵ His White House credentials were revoked thereafter.⁶

A-5. Days after his testimony before Congress, Ziegler posted a 27-minute rambling on Telegram attacking the ongoing investigation by Congress and witnesses who spoke out against Former President Trump. Zeigler's recording accused the Members of Congress leading the Jan. 6 investigation of being "Bolsheviks" who "hate the American founders and most white people." (The committee, it's worth noting, was headed by Rep. Bennie Thompson (D-Miss.), who is Black.) "This is a Bolshevistic anti-white campaign. If you can't see that, your eyes are freaking closed," Ziegler says. Zeigler went on to call two female former White House aides, Cassidy Hutchinson and Alyssa Farah, "total hoes and thots," further referring to Farah as a "hoebag" in response to them speaking out against the Trump administration.⁷

A-6. In October of 2021, Garrett Ziegler transcribed and published the private diary of Ashley Biden, Defendant's sister.⁸ The diary was illegally obtained and sold by Aimee Harris and Robert Kurlander to Project Veritas for \$40,000 in September of 2020, resulting in both parties pleading guilty to "conspiracy to commit interstate transportation of stolen property."⁹

A-7. Zeigler is the sole member of ICU, LLC d/b/a Marco Polo USA, a 501(c)(3) organization dedicated to researching and publishing the data in the so-called "Biden laptop."

⁵ Zachary Cohen, *Ex-Trump aide tied to 'unhinged' December 2020 White House meeting speaks with January 6 committee*, CNN, July 19, 2022, <https://www.cnn.com/2022/07/19/politics/garrett-ziegler-january-6-committee-meeting/index.html> (last accessed April 19, 2023)

⁶ Alex Thompson et al., *The Holy War over Hunter Biden's laptop*, Politico, Jul. 13, 2022, <https://www.politico.com/newsletters/west-wing-playbook/2022/07/13/the-holy-war-over-hunter-bidens-laptop-00045698> (last accessed April 19, 2023)

⁷ Newsweek; July 21, 2022 "Garrett Ziegler Rants About 'Anti-White' Jan.6 Committee in Viral Clip" www.newsweek.com/trump-garrett-ziegler-rant-january-6-committee-clip-1726586?amp=1; Rolling Stone; July 21, 2022 "Total Hoes and Thots": Ex-Trump Aide Rails Against Jan. 6 Committee in Unhinged Rant; www.rollingstone.com/politics/politics-news/jan-6-committee-trump-aide-rant-garrett-ziegler-1386093/amp/ (last accessed April 19, 2023)

⁸ Alex Thompson et al., *The Holy War over Hunter Biden's laptop*, Politico, Jul. 13, 2022, <https://www.politico.com/newsletters/west-wing-playbook/2022/07/13/the-holy-war-over-hunter-bidens-laptop-00045698>; and see also <https://marcopolousa.org>.

⁹ Luke Barr, *Pair pleads guilty to stealing Ashley Biden's diary, selling it to Project Veritas*, Aug. 25, 2022, ABC News, <https://abcnews.go.com/Politics/pair-plead-guilty-stealing-ashley-bidens-diary-selling/story?id=88849834>

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This information was uploaded from unverified data to his website, Marco Polo USA. Zeigler released via his Marco Polo Website 128,775 emails into a searchable database that users can even download for Mac or Windows computers linked to a site, BidenLaptopEmails.com, without permission from its owners.¹⁰ Zeigler has made statements regarding his disseminating unauthorized copies of the data (or links to a so-called ‘megadrive’) to others, such as Tore Maras, and posting unauthorized data on his website, without the consent of the data’s owner.¹¹

A-8. In addition, at the Marco Polo site viewers can access:

- Suspicious Activity Reports
- Email Addresses on the Biden Laptop
- HB I-phone Backup Messages
- HB I-phone Backup Whatsapp Messages.Zip
- A “Devastating” Op-Ed From Maureen Dowd
- An Orgy with Daphne Guinness, and Joe Thinks I’m a God
- A Wrecked Life: Hunter’s Bills
- Biden + McCain = American Misery
- Cathay Bank 8969
- Cathay Bank 8992
- Hunter Biden Safari Browser History.Csv
- Biden Laptop Messages.Zip PDF
- Tony Bobulinski Messages.Zip PDF
- Subpoena on 05/15/2019

¹⁰ See <https://marcopolousa.org> & link to <https://bidenlaptopemails.com> (last accessed April 19, 2023)

¹¹ Letter from Patrick Bergy to Asst. Attorney General Matthew G. Olsen (Feb. 28, 2023), available at https://www.freedomstream.tv/author/patreon_25767443/ (last accessed April 20, 2023)

- Soft Coup Planning Call on 10/25/2018
- Alimony From Hell On 03/21/2017
- "Most Genius Shit Ever.MP3" On 05/11/2018
- Wanted: James Andrew Gilliar – Čeština
- Hunter And Hallie: The Cocaine Saga on 06/23/2018
- Ashley Biden Diary: Transcribed and the Original
- Delray Beach FL Police Report
- Delray Beach FL Police Body Cam
- A Video “Report on the Biden Laptop” created and narrated by Zeigler.¹²

In this capacity, Zeigler has accused Defendant of various crimes and referred to his family as the “Biden crime syndicate.”¹³

A-9. Zeigler’s war on the Defendant flows to others connected to Defendant as reflected on the various examples of social media attack posts. *See attached Exhibit 2.* As can be seen on his website or social media platforms, Zeigler’s efforts against Defendant even has included his posting pictures of Defendant’s two-year old son making derogatory comments on Defendant’s parenting.

A-10. In August of 2022, on the social media and messaging sites Telegram and Truth Social, Ziegler posted confidential information about the FBI agents involved in the raid on Donald Trump’s Mar-a-Lago Club, stating: “This is one of the two feds who signed the ‘Receipt for Property’ form, which detailed—at a very high level—the fishing expedition that the FBI performed at Mar-a-Lago,” further listing the dates of birth, work emails, and links to alleged family members’ social media accounts. He further stated about one of the agents: “Hope he

¹² <https://marcopolousa.org> (last accessed April 19, 2023)

¹³ *Id.*

doesn't get a good night's sleep for the rest of 2022.”¹⁴ The original post is now deleted. He was thereafter accused of “doxing,” defined by Merriam-Webster’s Dictionary as “to publicly identify or publish private information about (someone) especially as a form of punishment or revenge.”¹⁵

A-11. On March 17, 2023 Zeigler was sent a demand from counsel for Defendant in Delaware outlining the various attacks which are widely reported on multiple media sources demanding he return data in his possession any files belonging to Defendant. *See attached Exhibit 3*. Additionally Zeigler has been sued in the Superior Court of the State of California in a case styled “*P. Kevin Morris, Plaintiff v. Garrett Ziegler, an individual, ICU, LLC, a Wyoming limited liability company, doing business as MarcoPolo USA; and DOES 1-10, Defendants*”; No. 23SMCV01418 for harassment, invasion of privacy, criminal impersonation and intentional infliction of emotional distress. *See attached Exhibit 4*.

A-12. Finally and just one day after Plaintiff designated Zeigler as an “expert”, while presenting to a group of extremists on Saturday, April 15, 2023, Zeigler makes an apparent power point presentation his 644-page dossier and discusses for over two hours his attack on Hunter Biden and his family, wherein he pronounces “nobody wanted to take a chance” that others are “wussies...they are scared of Biden Inc. I am not scared of that because I have nothing to lose”¹⁶, in accusing Defendant and other family members including President Joe Biden have “committed federal crimes money laundering, FARA violations, sex trafficking, these are serious

¹⁴ Zachary Petrizzo, Ex-Trump Aid Sics MAGA Lackeys on Alleged FBI Agents’ Families, Aug. 12, 2022, <https://www.thedailybeast.com/ex-trump-aide-sics-maga-lackeys-on-alleged-fbi-agents-families> (last accessed April 19, 2023)

¹⁵ *Doxing*, Merriam-Webster’s Dictionary, <https://www.merriam-webster.com/dictionary/doxing> (last accessed April 20, 2023)

¹⁶ 20230416-MarcoPoloUsaPresentation, 01:15 – 01:38 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

crimes for which mere mortals, i.e. non-Presidents, non-Biden, non-connected people go to the pen for... .”¹⁷ Zeigler brags to the assembly that “I have sent this, I have digitally carpet bombed this dossier across the nation. I sent it to every single media outlet.”¹⁸ While seeking financial supporters for his quest he states that “I can prove ... business related crimes because what Hunter, his Uncle Jimmie and Joe ... their business model was violating the Foreign Agent Registration Act”.¹⁹

A-13. Most concerning and relevant to the motion before the Court is in the April 15, 2023 speech, Zeigler goes on with the public and posted presentation that “Hunter has gotten away with so much. The only person that has held Hunter accountable for anything in his entire life is the lawyer for his baby momma in Arkansas, okay, and I have since been approached by him and working with him, his name is Clint Lancaster.”²⁰ Zeigler states that “Hunter received a [REDACTED] and Hunter used that money [REDACTED]”²¹ Then while discussing very specific financial transactions and naming various financial associations of Defendant and sources of income to Defendant, Zeigler specifically states, [REDACTED]²²

¹⁷ 20230416-MarcoPoloUsaPresentation, 08:50 – 09:05 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

¹⁸ 20230416-MarcoPoloUsaPresentation, 05:11 – 05:22 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

¹⁹ 20230416-MarcoPoloUsaPresentation, 09:50 – 10:04 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

²⁰ 20230416-MarcoPoloUsaPresentation, 48:38 – 48:54 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

²¹ 20230416-MarcoPoloUsaPresentation, 1:17:46 – 1:18:17 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

²² 20230416-MarcoPoloUsaPresentation, 1:39:36 – 1:39:42 embedded video timestamp https://purposefulnerding-my.sharepoint.com/:u:/p/vinnie/EY_Fg02rMs5Ns9KSydkYKn8Bvkvt3sLEv-blb4xAVa5XQ?e=LeVqyb (last accessed April 19, 2023)

A-14. Zeigler has used his registered non-profit organization to solicit funds which he uses to fuel his campaign to harass Defendant and his family.²³

B. Motion to Exclude and Disqualify Garrett Zeigler

B-1. Garret Ziegler is not qualified.

a. If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness *qualified* as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise. Ark. R. Evid. 702. If some reasonable basis exists demonstrating that the witness has knowledge of the subject beyond that of ordinary knowledge, the evidence is admissible as expert testimony. *Dildine v. Clark Equip. Co.*, 282 Ark. 130, 135, 666 S.W.2d 692, 694 (1984). A witness is qualified unless he is clearly lacking in either training or experience. *Id.* at 134.

b. Plaintiff seeks to qualify Ziegler to testify as to his opinion regarding Defendant's "financial condition" and perform an "economic analysis of his accounts and transactions." Ziegler is not qualified as an expert to analyze a person's financial condition nor analyze a person's financial accounts. Ziegler has only his bachelor's degree in economics – "a social science dealing with the production, distribution, and consumption of goods and services." *Economics*, Black's Law Dictionary (11th ed. 2019). He has no postgraduate degree in the subject. Even if he were considered an expert in economics, the type of expert testimony he aims to provide is unrelated to economics. Analyzing financial transactions and tax returns are tasks suited to a forensic accountant specializing in tax accounting and/or financial accounting; Black's Law Dictionary defines "forensic accounting" to mean "the application of accountancy

²³ <https://int.nyt.com/data/documenttools/abbe-lowell-seeks-i-r-s-investigation-of-group-that-disseminated-hunter-biden-s-files-feb/6d2e4cecb4c077dd/full.pdf> (last accessed April 20, 2023)

principles to monetary issues that arise in courts, as in the apportionment of funds and of financial responsibilities upon a divorce or dissolution of a partnership.” *Forensic Accounting*, Black’s Law Dictionary (11th ed. 2019). Expertise in forensic accounting, generally as a CPA or otherwise, is the type of expertise that would be needed to provide the type of expert testimony that Ziegler aims to give. Ziegler has no formal education, training, skill, or experience in the field of forensic accounting.

c. Likewise, many of the cases in Arkansas involving valuation of someone’s financial status (or that of an entity) involve expert testimony by a certified public accountant (CPA) or business appraiser, which Ziegler is not. *See, e.g., Nauman v. Nauman*, 2018 Ark. App. 114, at 3, 542 S.W.3d 212, 214 (Ct. App.) (calculation of income by CPA in child support case); *Rogers v. Rogers*, 2014 Ark. App. 192, at 5, 432 S.W.3d 704, 706 (Ct. App.) (CPA testimony about retirement accounts in divorce); *Wright v. Wright*, 2010 Ark. App. 250, at 3, 377 S.W.3d 369, 371 (Ct. App.) (valuation of company by CPA in divorce and child support case); *Wilcox v. Wilcox*, 2022 Ark. App. 18, at 11, 640 S.W.3d 408, 415 (Ct. App.) (valuation of company by accredited appraiser and CPA in divorce case); *Stepp v. Gray*, 58 Ark. App. 229, 238, 947 S.W.2d 798, 802 (1997) (tax testimony by CPA in child support case); *Tortorich v. Tortorich*, 50 Ark. App. 114, 117, 902 S.W.2d 247, 249 (1995) (valuation of business interest by CPA in child support case); *Beggs v. Beggs*, No. CA07-767, 2008 Ark. App. LEXIS 307, at *3 (Ct. App. Apr. 9, 2008) (calculation of income by CPA in child support case); *Jester v. Jester*, No. CA 95-859, 1996 Ark. App. LEXIS 822, at *10 (Ct. App. Dec. 23, 1996) (valuation of business during divorce by CPA). These cases indicate that it is common practice for an accountant or other financial professional to serve as an expert witness in cases involving expert testimony about income or financial condition, and Ziegler is not an accountant or financial

professional of any kind.

d. Thus, the Court should disqualify Ziegler because he only holds a bachelor's degree in economics, an unrelated field to accounting or finance, and has no experience, training education, or skill in the areas of accounting or finance.

B-2 Garrett Ziegler's testimony would not be relevant.

a. All relevant evidence is admissible, and evidence which is not relevant is not admissible. Ark. R. Evid. 402. "Relevant evidence" means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence. Ark. R. Evid. 401.

b. The primary fact of consequence to be decided is Defendant's gross income after March 12, 2020, and evidence of Defendant's gross income before March 12, 2020, is not relevant. Evidence of a party's gross income is relevant to calculate child support, as it is the sole fact of consequence when making a standard child support calculation. *See* Ark. Sup. Ct. Admin. Order No. 10 § 5.1. However, Defendant's gross income before March 12, 2020, has already been decided by this Court's Final Agreed Order ("Final Order" hereafter) of the same date. As his gross income for the period before March 12, 2020, has already been decided, evidence related to his income during that period is not a fact of consequence. The laptop upon which Ziegler plans to base his testimony was abandoned sometime in 2019, before the Final Order. To the extent this laptop contains any evidence relating to Defendant's gross income, that evidence is not relevant because it relates to dates before the Final Order.

c. Further, Defendant is asserting a change in circumstances sufficient to petition the Court for modification under both A.C.A. § 9-14-107(a)(1) and A.C.A. § 9-14-107(c)(2). A.C.A. § 9-14-107(a)(1) creates a change in circumstances sufficient to petition a court for

modification when a payor suffers a 20% reduction in income, meaning the facts of consequence in such a case are a payor's gross income as decided by the child support order and a payor's gross income at the time of petitioning. In this case, the facts of consequence are the income findings contained in the Final Order and evidence of Defendant's current income. A.C.A. § 9-14-107(c)(2) creates a change in circumstances sufficient to petition a court for modification if there is an inconsistency between the current child support guidelines and the child support order. Under this statute, the only fact of consequence is Defendant's current income. In either case, evidence of his income before the Final Order is not relevant.

d. Other facts of consequence relate to the factors used to determine whether there is a change in circumstances sufficient to modify the award. To determine whether there has been a change in circumstances warranting adjustment in support, a court should consider remarriage of the parties, a minor reaching majority, change in the income and financial conditions of the parties, relocation, change in custody, debts of the parties, financial conditions of the parties and families, ability to meet current and future obligations, and the child-support chart. *Hall v. Hall*, 2013 Ark. 330, at 5, 429 S.W.3d 219, 222. All facts of consequences for each of these factors have already been decided by the Final Order or relate to events which happened after.

e. If Plaintiff contends that Ziegler only intends to testify as to Defendant's current gross income and financial condition based on any financial evidence from the 2019 laptop, such testimony would not tend to make any contention about his current income and financial condition more or less probable. Evidence of Defendant's income from three years ago and beyond would not tend to prove his income today.

f. Thus, the Court should exclude any expert testimony related to the laptop as not relevant.

B-3. Ziegler’s testimony will not assist the trier of fact in understanding the evidence or determining the facts at issue.

a. If scientific, technical, or other specialized knowledge *will assist the trier of fact to understand the evidence or to determine a fact in issue*, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise. Ark. R. Evid. 702 (emphasis added). Expert testimony must be both reliable and relevant under this standard. *Hudson v. State*, 85 Ark. App. 85, 103, 146 S.W.3d 380, 391 (2004). As stated in the previous section, the testimony that may be given by Ziegler would not be relevant.

b. For determinations of reliability, courts must apply the *Daubert* “gatekeeping function”; in other words, a circuit court must make a preliminary assessment of whether the reasoning or methodology underlying expert testimony is valid and whether the reasoning and methodology used by the expert has been properly applied to the facts in the case. *Bayer CropScience LP v. Schafer*, 2011 Ark. 518, at 17, 385 S.W.3d 822, 833. “It is to make certain that an expert, whether basing testimony upon professional studies or personal experience, employs in the courtroom the same level of intellectual rigor that characterizes the practice of an expert in the relevant field.” *Id.* (citing *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 152 (1999)).

c. While Arkansas courts have not weighed in on the issue, “generally accepted accounting principles (GAAP)” is often considered reliable methodology in other courts. *See e.g., Parkway Neuroscience & Spine Inst. v. Katz*, 255 Md. App. 596, 623 n.7, 283 A.3d 753, 768 (2022); Black’s Law Dictionary defines “generally accepted accounting principles” as “conventions, rules, and procedures that define approved accounting practices at a particular time. These principles are issued by the Financial Accounting Standards Board for use by

accountants in preparing financial statements. The principles include not only broad guidelines of general application but also detailed practices and procedures." *Generally Accepted Accounting Principles*, Black's Law Dictionary (9th ed. 2009). For example, in *Scafidi v. Hille*, 180 So. 3d 634, 660 (Miss. 2015), the Supreme Court of Missouri noted that an expert report was required to follow generally accepted principles of accounting under its Rule 702 reliable methodology rule. *See also, Bowen v. Bowen*, 96 N.J. 36, 49, 473 A.2d 73, 80 (1984) (disfavoring testimony by an accountant when he did not use GAAP but instead stated his opinion from experience); *State ex rel. French v. Card Compliant, LLC*, No. N13C-06-289 PRW CCLD, 2018 Del. Super. LEXIS 380, at *21 (Super. Ct. Aug. 29, 2018) (holding that testimony from a CPA was reliable despite not using GAAP because there were no GAAP provisions on point and another methodology was found to be reliable). As a person with no expertise in accounting, Ziegler has no expertise in the generally accepted principles of accounting.

d. If Ziegler were to use a different methodology, as someone without accounting expertise, he would not be able to satisfy the *Daubert* factors. A trial court should consider the specific factors identified in *Daubert* where they are reasonable measures of the reliability of expert testimony. *Bayer CropScience LP v. Schafer*, 2011 Ark. 518, at 17, 385 S.W.3d 822, 834. Under *Daubert*, circuit court must make a preliminary assessment of whether the reasoning or methodology of the underlying expert's testimony is valid and whether the reasoning and methodology used by the expert has been properly applied to the facts in the case. *Id.* at 17.

e. Under the *Daubert* standard, a court must analyze (1) whether the scientific theory or technique can be or has been tested; (2) whether the theory or technique has been subjected to peer review and publication; (3) the potential rate of error; (4) the existence and maintenance of standards controlling the technique's operation; and (5) whether the theory or

technique has general acceptance in the community. *Green v. George's Farms, Inc.*, 2011 Ark. 70, at 4 n.2, 378 S.W.3d 715, 718. Generally accepted principles of accounting are “generally accepted” in the accounting community. Indeed, one court found that an expert’s testimony was inadmissible because he disclaimed his expertise in the generally accepted principles of accounting. *Little v. Speyside Fund, LLC (In re Pac. Steel Casting Co. LLC)*, Nos. 19-40193, 19-4057, 2022 Bankr. LEXIS 2223, at *13 (Bankr. N.D. Cal. Aug. 10, 2022). There is no alternative methodology acceptable for Ziegler’s basis to testify that would pass *Daubert* muster.

B-4. Garrett Ziegler is a security and confidentiality risk.

a. A trial court has the inherent authority to protect the integrity of the proceedings and safeguard the rights of the litigants before it. *Reid v. Frazee*, 72 Ark. App. 474, 479, 41 S.W.3d 397, 400-01 (2001) (citing *City of Fayetteville v. Edmark*, 304 Ark. 179, 194, 801 S.W.2d 275, 283 (1990)).

b. Based on the facts stated herein, Garrett Ziegler cannot be trusted to comply with the protective orders issued by this Court. Not only is he likely not to comply with the protective orders in the future, but he has already violated the protective orders in his April 15, 2023, statements disclosing elements of Defendant’s tax returns given to him by opposing counsel. Qualifying him as an expert witness in this case risks a serious violation of Defendant’s right to privacy, violations of this Court’s protective orders, insults the Court’s authority and integrity, slows the progress of these proceedings, and wastes the time, money, and resources of the parties and this Court.

c. Therefore, the Court should exercise its inherent authority to exclude Ziegler from serving as an expert witness for Plaintiff in the interests of the privacy of Defendant and the integrity of these proceedings.

B-4. Conclusion

With the explanation of Zeigler's background and war against the Biden family, it should be clear that his being designated as an "expert" was for a purpose far removed from providing the Court with any relevant information to decide the actual issues that are pending before the Court. Thus, the Court should exclude any testimony by Ziegler related to the income or financial condition of Defendant because he is not an expert in the generally accepted principles of accounting and would not satisfy the *Daubert* factors.

C. Motion for Contempt and Sanctions

C-1. The Court entered a Protective Order on March 27, 2023 following a hearing on February 22, 2023 wherein the Court not only distinctly discussed the concerns "for protection of private information of the parties" and how "the court expects great compliance with disclosure in discovery", but also specifically incorporated into the Protective Order, "the court has no concern for the political nature or aspects surrounding this case. *See Protective Order filed in this cause March 27, 2023.*

C-2. The Court specifically was concerned with Plaintiff's counsel disregard of the prior protective orders in this cause by his public statements in March 2022, in an interview with CNBC, stating, "I expect [Defendant] to be indicted **Just based on what I saw in his financial records**, I would be surprised if he's not indicted."²⁴ The Court's noticeably clear direction to Plaintiff's counsel was that the disclosure of financial matters or discussions outside the proceedings in this cause by Plaintiff's counsel would not be tolerated.

²⁴ Dan Mangan, *Mother of Hunter Biden's child testified in tax probe, lawyer handed over financial records*, CNBC (Mar. 17, 2022), <https://www.cnbc.com/2022/03/17/hunter-biden-criminal-investigation-gets-testimony-records.html>.

FILED UNDER SEAL SUBJECT TO 03/27/2023 PROTECTIVE ORDER

C-3. The Court, after balancing the “competing interests of the parties and the public in making this order,” granted the Defendant’s motion for a protective order. *See Protective Order, supra*. The Court ordered that “all discovery or responses to discovery and discovery related documents are sealed.” *Id.* Finally, “all expert witnesses engaged or retained by an attorney of record shall sign an acknowledgment that they are aware of the protective order in this cause and a nondisclosure agreement in which the expert agrees to hold all information related to this case in confidence, not disclose the information to any third parties, store all information related to this case in a secure environment, and secure all electronic information related to this case in at least 256 bit AES encryption.” *Id.* (emphasis added)

C-4. Pursuant to Ark. R. Civ. P. 37(1)(2), Defendant moves the Court to sanction the Plaintiff’s counsel and his designated “expert” Zeigler for violating the Court’s Protective Order. The Defendant moves the Court for a finding of contempt for violation of the Court’s order and to:

- (a) refuse to allow Plaintiff to support or oppose Defendant’s claims;
- (b) prohibit Plaintiff from obtaining or introducing matters prior to March 12, 2020;
- (c) prohibit Plaintiff from calling Zeigler as a witness;
- (d) prohibit Plaintiff from permitting Zeigler from access to all discovery or responses to discovery;
- (e) prohibit Plaintiff from permitting Zeigler from attending any depositions;
- (f) provide documents (written or electronic) evidencing any and all documents disclosed to Zeigler by Plaintiff or her counsel;
- (g) that all documents disclosed to Zeigler be returned by a date certain and confirm to the Court and Defendant their return;

- (h) Zeigler be ordered not to disclose any documents obtained through Plaintiff or her counsel, immediately and into the future; and
- (i) that at least twenty (20) days prior to the disclosure of any future discovery to any person(s) that Plaintiff may designate as an expert, that Plaintiff's counsel be ordered to disclose to the Court and Defendant's attorney the name and curriculum vitae of any expert reflecting occupation, education, training, skills, specialty if any, prior testimony (deposition or court), and the anticipated substance of the facts and opinions to which the expert is expected to testify, to permit Defendant the opportunity for hearing to object to the disclosure. That if an objection is filed by Defendant within twenty (20) days of the disclosure of the expert, Plaintiff is restrained from disclosure until further hearing of the Court.

C-5. Defendant should be awarded a reasonable attorney fees, expenses and costs as authorized, to be submitted by affidavit of Defendant's attorney prior to the Court entering its order, and to further sanction the Plaintiff for contempt and discovery abuse in this cause.

D. Petition For Temporary Restraining Order

D-1. Based upon the facts above it can be certainly anticipated that Plaintiff, her attorney, and Zeigler will continue to disclose protected financial information to those persons not authorized to obtain the information by the Court's Protective Order or by web-based or social media sites.

D-2. A full hearing needs to be held regarding the matters asserted in this motion.

D-3. A temporary restraining order should be issued immediately and without hearing prohibiting Plaintiff, her attorney, and Zeigler from disclosing, publishing, or discussing any of

the Defendant's financial information or matters obtained through discovery in this cause. Ark. R. Civ. P. 65(b).

D-4. A temporary restraining order is necessary to avoid irreparable harm to Defendant.

E. Conclusion

WHEREFORE, Defendant requests the Court as follows:

- a. Set a hearing on this motion pursuant to Ark. R. Civ. P. 78(c);
- b. Issue an order excluding and disqualifying Garrett Ziegler as an expert witness;
- c. Grant the motion for sanctions and contempt as plead for herein;
- d. Enter an immediate temporary restraining order;
- e. Award Defendant attorney fees, expenses and costs; and
- f. for all other relief to which he may be entitled.

Respectfully submitted,

LANGDON★DAVIS, L.L.P.
3211 McKnight Crossing (phys.)
P.O. Box 1547 (mail)
Texarkana, TX 75503
Tel: (903) 223-3246
Fax: (903) 223-5227

By: /s/ Brent M. Langdon
Brent M. Langdon
AR State Bar No. 90042
E-mail: blangdon@ldatty.com

Attorney for Defendant

CERTIFICATION OF CONFERENCE

I certify that I contacted Clinton Lancaster, attorney for Plaintiff, on April 19, 2023 regarding his intentions on Garret Zeigler's receipt of case information to which counsel responded, "he is out expert....we have provided him with our case file".

By: /s/ Brent M. Langdon
Brent M. Langdon
AR State Bar No. 90042

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on each attorney of record or party on April 20, 2023 via the eFlex document filing and management system consistent with the provisions of Section 7 of the Administrative Order No. 21, as follows:

Clinton W. Lancaster
clint@thelancasterlawfirm.com
Jennifer M. Lancaster
jennifer@thelancasterlawfirm.com
LANCASTER & LANCASTER
LAW FIRM, PLLC
P.O. Box 1295
Benton, Arkansas 72018

By: /s/ Brent M. Langdon
Brent M. Langdon
Attorney for Defendant

VERIFICATION

Robert Hunter Biden appeared in person before me today and stated under oath:

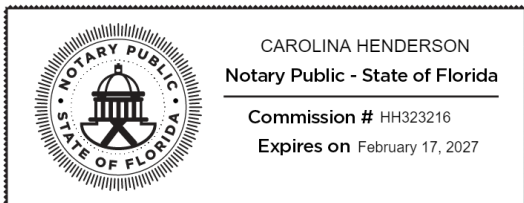
"My name is Robert Hunter Biden. I am above the age of eighteen years, and I am fully competent to verify that the I have reviewed the above and foregoing motions and I certify that the facts stated therein are within my personal knowledge and are true and correct. I further specifically state that the disclosing, publishing, or discussing any of my financial information or matters obtained through discovery at any time in the case by the Plaintiff or her attorney or that the documents or information remaining in Garrett Zeigler's possession will cause immediate and irreparable injury for which there is not legal remedy.

Notarized online using audio-video communication

Robert Hunter Biden

Robert Hunter Biden
Robert Hunter Biden

SIGNED under oath before me on ^{CH} ~~February~~ April ~~XXXXXX~~ 20th, 2023.



Carolina Henderson

Notary Public, State of Florida

IN THE CIRCUIT COURT OF INDEPENDENCE COUNTY, ARKANSAS		
LUNDEN ROBERTS	PLAINTIFF	
vs.		Case No:
HUNTER BIDEN	DEFENDANT	32DR-19-187

**PLAINTIFF'S SUPPLEMENTAL ANSWERS TO
INTERROGATORIES PROPOUNDED BY DEFENDANT**

COMES NOW the plaintiff, and for her supplemental interrogatories state:

INTERROGATORY NO. 19: Identify any person who is expected to be called to testify at the trial of this lawsuit, describe the subject matters upon which you believe they have knowledge, and state whether each will testify as a lay or expert witness.

ANSWER: Myself.
 Robert Hunter Biden.
 Edward Prewitt
 Jeff Cooper
 John Robinson "Rob" Walker
 George Berges
 Gabrielle "Gaby" Morgerman
 Eric Schwerin
 Devin Archer
 Dr. Krista Archer

These are lay witnesses and they will testify as to their knowledge about Hunter Biden and the subject matter of this case.

INTERROGATORY NO. 20: If you intend to call anyone as an expert witness to testify at trial, identify each person, and for each such witness, supply the following information:

- (a) The subject matter of his/her expected testimony at trial;
- (b) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion;
- (c) The expert's occupation or profession;

- (d) The expert's job title or position;
- (e) The expert's educational background, including the names of all institutions attended, the dates of attendance and the degree, if any, received;
- (f) The titles and dates of publication of any article or book which the witness has written;
- (g) The expert's specialty, if any, within the expert's profession;
- (h) The expert's business background, including the names of all past employers, the position held and the dates of each such employment;
- (i) The names of any professional association or societies of which the witness is a member, including a description of any position held by the witness in each such association or society;
- (j) The identity of each prior action in which each such witness was retained and testified as an expert witness, including:
 - 1. The case, caption, docket number and name of the court or agency involved;
 - 2. The name of the party on whose behalf such testimony was given;
 - 3. The dates of such testimony;
 - 4. A description of the nature of the proceeding in which such testimony was given;
- (k) State whether such witness has ever been excluded from testifying at any previous trial of any action and, if so, the reason for such exclusion;
- (l) State whether such witness' professional capacity or qualification has ever been investigated by any official body, professional society, educational institution or other entity;
- (m) If the answer to (l) is affirmative, state:
 - 1. The date of each such inquiry;
 - 2. The name of the person or entity making such inquiry;
 - 3. The substance of such inquiry;
 - 4. The outcome of such inquiry; and
 - 5. The identity of each person having knowledge of such inquiry;

- (n) Identify each document which each such expert witness had received from you or your counsel; and
- (o) Identify all documents that will be utilized by each such expert witness in the preparation of his/her testimony.

ANSWER TO INTERROGATORY NO. 20

Garret Ziegler. gz@x4.com. Mr. Biden has Mr. Ziegler's personal cell phone number.

- (a) Hunter Biden, his financial condition, economic analysis of accounts and transactions based on viewing documents provided in discovery, the contents of Hunter Biden's laptop abandoned in Delaware, and publicly available information.
- (b) Director, Marco Polo
- (e) Magna Cum Laude from St. Louis University May 2018 (aug 2014), BS Economic.
- (f) Published 10/22.

Multiple published documents with Peter Navarro in the Trump White House.
- (g) Mr. Ziegler is an expert in Hunter Biden, his life, finances, personal history, financial history, the Biden Companies, and the manner in which the Biden family interacts interpersonally and financially.
- (h) Executive Office of the President, White House Office, Feb 2019 to Jan 2021.

Marco Polo, Inc., July 2021 to present.
- (j) No testimony. Did testify in front of the January 6 Select Subcommittee
- (k) NA
- (l) No.
- (m) NA
- (n) All documents provided in discovery.

- (o) All documents provided in discovery. Components of the hard drive from the Biden laptop.

INTERROGATORY NO. 21: If any letters, correspondence (including electronic writings), drawings, graphs, charts, photographs, tape or electronic recordings, and/or audio/video recordings exist that constitute or contain matter relevant to the subject matters of this lawsuit, describe each item and state its location or the identity and location of each item.

ANSWER TO INTERROGATORY NO. 21: REPORT ON THE BIDEN LAPTOP, by Marco Polo, Inc., (written by Garrett Ziegler).

22. If any diaries, notes, memoranda, journals, or calendars, including electronic diaries, notes, memoranda, journals, or calendars, or other written logs exist that are relevant to the subject matter of this lawsuit, describe each item and state its location or the identity and location of each item.

ANSWER TO INTERROGATORY NO. 22: REPORT ON THE BIDEN LAPTOP, by Marco Polo, Inc., (written by Garrett Ziegler).

27. Identify any sources that provided you with the draft of the Interrogatories or Requests for Production serviced on Defendant, or any interrogatories or requests for production therein, state the following information:

- (a) the identity and location of the sources, whether entities or persons, and any agents thereof;
- (b) the form and substance of the communication that relayed such information; and
- (c) whether any consideration was given or received for the provision of such information, and if so, the character of the consideration.

ANSWER: My attorney created the interrogatories.

Respectfully Submitted,

**LANCASTER & LANCASTER
LAW FIRM, PLLC**

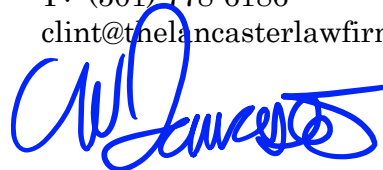
P.O. Box 1295

Benton, AR 72018

P: (501) 776-2224

F: (501) 778-6186

clint@thelancasterlawfirm.com



By: /S/ CLINTON W. LANCASTER
Clinton W. Lancaster, 2011179

CERTIFICATE OF SERVICE

By my signature above, I certify pursuant to Ark. R. Civ. P. 5(e) that a copy of the foregoing has been delivered by the below method to the following person or persons:

☐ First Class Mail ☐ Facsimile ☒ Email ☐ AOC/ECF ☐ Hand Delivery

Brent Langdon

on this 14 DAY of APRIL, 2023.

Garrett Ziegler
Voice Message

November 3, 2022

Garrett Ziegler

Garrett Ziegler

"Natalie thinks I molest her." — R. Hunter...

Tweet



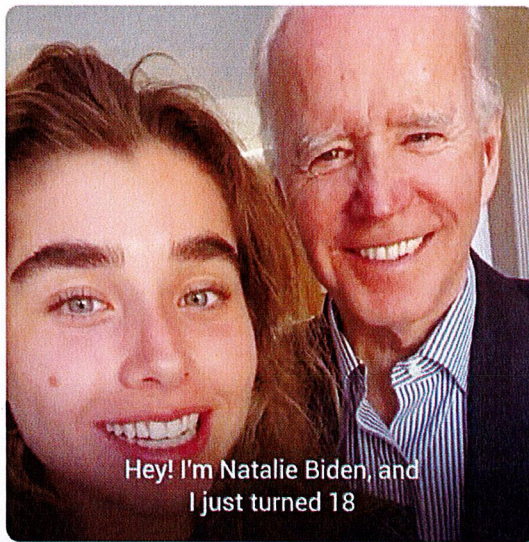
Joe Biden

@JoeBiden

United States government official

There's nothing like a triple-thick black and white milkshake to celebrate my granddaughter Natalie's first time voting.

Make your plan to vote early or on Election Day at [IWillVote.com](https://www.IWillVote.com).



Hey! I'm Natalie Biden, and I just turned 18

twitter.com/joebiden/status/1587889784621522947

kanekoa.substack.com/p/hunter-bidens-sexually-inappropriate

dailywire.com/news/hunter-biden-laptop-reveals-disturbing-information-about-presidents-son-underage-relative

Q Hunter



Cancel

September 11, 2022

Garrett Ziegler
Forwarded From
G



**Peter George
Heermann Neal**
DOB: 04/17/1997

Hunter's son in law to be. A match
made in hell.



286



97



3

37.8K 5:07 AM

Garrett Ziegler



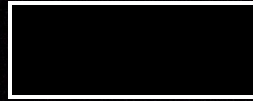
Garrett Ziegler

My favorite out of all the Scriptures....



79 of 563

6:16



489



3

October 9, 2022

28.6K 1:04 AM



Garrett Ziegler

Tucker Carlson's wife is still connected to Hunter Biden's daughter (and ex-wife) on Venmo. Can someone please tell Susie to send Maisy some crack money for her Dad if he agrees to sit down and do a face-to-face with Tony Bobulinski on Tucker's show?



683



78



63



9



6

31K 2:22 AM



Garrett Ziegler

Tucker Carlson's wife is still connected to Hunter B...

Feel free to send this Telegram post — t.me/GarrettZ/7785 — to Tucker. You can find his email address on the Biden Laptop, here: bidenlaptopemails.com/biden-emails/email.php?id=20141113-122729_52537



273



82



33



8

30.3K 2:25 AM



Garrett Ziegler

Forwarded From

Marco Polo



"He used the name Temujin GK LLC for a shell company through which

H - this is egregious!!



10:09

TELEGRAM

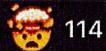
5G+ 3

Hunter

Cancel



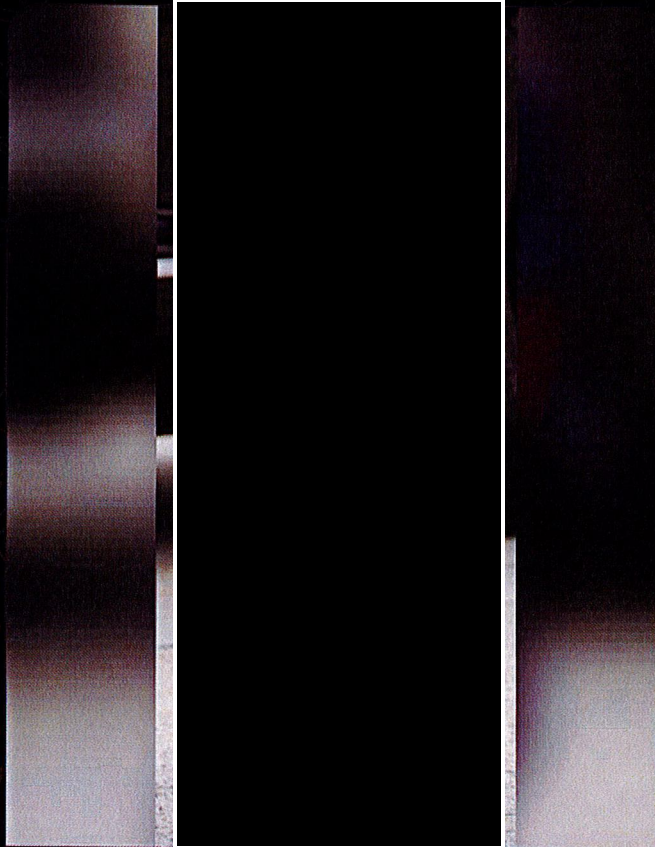
394



114

August 10, 2022

35.5K 1:55 PM



"If only you knew what I have seen —
and heard — already"

nypost.com/2022/08/10/hunter-biden-joins-joe-for-vacation-as-gop-slams-fbi-for-double-standard-after-trump-raid/amp/



583



69



11



11



6

35.6K 10:17 PM

Garrett Ziegler
Forwarded From
Keith

94 of 563

March 17, 2023

VIA E-MAIL

Mr. Garrett M. Ziegler
c/o John C. Kiyonaga, Esq.
John C. Kiyonaga, P.C.
600 Cameron Street
Alexandria, VA 22314

Re: Follow-Up Correspondence re Litigation Hold Notice

Dear Mr. Ziegler:

On February 8, 2023, we sent a letter providing notice for the preservation and retention of all records and documents related to Robert Hunter Biden (“Mr. Biden”). You were instructed that the Notice shall remain in effect until further instruction from a court or from legal counsel. Nothing in this letter alters that instruction. We write to follow up on that Notice.

On various dates, you engaged in certain actions affecting our client, Mr. Biden, which we believe violate federal or Delaware state law, and/or made disparaging or false statements that would amount to defamation against our client. The following is a partial, non-exhaustive list of such actions or statements regarding Mr. Biden:

- Uploading a hard drive of unverified data containing what you were told was Mr. Biden’s personal data (however you came into possession of it) to your website, Marco Polo USA, for public access and searching without permission from its owners;
- Disseminating unauthorized copies of the data (or links to a so-called ‘megadrive’) to others, such as Tore Maras, and posting unauthorized data on your website, without the consent of the data’s owner;¹
- Claiming Mr. Biden “committed sex trafficking at least four times” and other “business-related crimes, sex-related crimes, and drug-related crimes” on a podcast with Steve Bannon;²

¹ Letter from Patrick Bergy to Asst. Attorney General Matthew G. Olsen (Feb. 28, 2023), *available at* https://www.freedomstream.tv/author/patreon_25767443/ (last accessed Mar. 7, 2023).

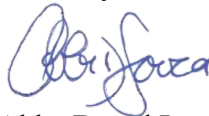
² Garrett Ziegler on Bannon’s War Room, *600 Page Dossier On The Hunter Biden Laptop Walkthrough The Lies To Guarantee Trump’s Loss In 2020* (Dec. 2022), <https://rumble.com/v1why2-600-page-dossier-on-the-hunter-biden-laptop-walkthrough-the-lies-to-guaran.html> (last accessed Mar. 7, 2023).

- Claiming Mr. Biden committed “FARA violations,” “money laundering,” “sex trafficking” and “civil RICO violations” on a podcast with Roger Stone;³
- Admitting to allegedly breaking into Mr. Biden’s iPhone back-up, stating: “We were the first group to do it in June of 2022. We cracked the encrypted code; it was stored on his laptop” and accessed “Hunter’s contact list and pull[ed] private investigative reports on all these people”;⁴
- Accusing Mr. Biden of soliciting young women on Craigslist and using Amtrak “to transport women who were about 19 to 24 across state lines for sex” in December 2018 on a podcast with Roger Stone;⁵ and
- Claiming Mr. Biden committed “over two-dozen” FARA violations, money laundering, and various drug crimes.⁶

To avoid litigation, if possible, we write to provide you with an opportunity to mitigate the harm that your conduct and/or statements have caused Mr. Biden. Specifically, we hereby demand that you: return any data in your possession that was sent to you or you obtained purporting to come from any account, device/hard drive, back-up files, “cloud” files, or copies of the same belonging to Mr. Biden; issue a public statement retracting your prior baseless allegations of violations of law by Mr. Biden (other than Mr. Biden’s admitted use of drugs); and issue an apology for obtaining or copying or disseminating any of his data without his authorization and for making the baseless allegations of violations of law by Mr. Biden.

Please promptly respond to this letter by March 31, 2023. Please note that your failure to mitigate the actions or statements may result in litigation and increased damages against our client on any successful cause of action.

Sincerely,



Abbe David Lowell

Counsel for Robert Hunter Biden

³ Garrett Ziegler and Tyler Nixon *EXPOSE Hunter Biden’s Dirty Secrets – The StoneZone with Roger Stone*, RUMBLE, <https://rumble.com/v1zv5m-garrett-zieger-and-tyler-nixon-expose-hunter-bidens-dirty-secrets-the-stone.html> (last accessed Mar. 7, 2023).

⁴ *Id.*

⁵ *Id.*

⁶ Garrett Ziegler on Bannon’s War Room, *600 Page Dossier On The Hunter Biden Laptop Walkthrough The Lies To Guarantee Trump’s Loss In 2020*, <https://rumble.com/v1whty2-600-page-dossier-on-the-hunter-biden-laptop-walkthrough-the-lies-to-guaran.html> (last accessed Mar. 7, 2023).

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3 EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
4 6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
5 Telephone: (323) 301-4660
Facsimile: (323) 301-4676
6

7 Attorneys for PLAINTIFF P. KEVIN MORRIS
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 P. KEVIN MORRIS, an individual,

12 Plaintiffs,

13 vs.

14 GARRETT ZIEGLER, an individual, ICU,
15 LLC, a Wyoming limited liability company,
doing business as MarcoPoloUSA; and
DOES 1-10
16

17 Defendants.
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Case No.: **23SMCV01418**

COMPLAINT FOR:

- 1) **HARASSMENT IN VIOLATION OF
CAL. PENAL CODE § 653.2
(DOXING)**
- 2) **CIVIL HARASSMENT**
- 3) **INVASION OF PRIVACY – FALSE
LIGHT**
- 4) **CRIMINAL IMPERSONATION**
- 5) **INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**

Electronically FILED by
Superior Court of California,
County of Los Angeles
4/03/2023 12:01 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By I. Valencia, Deputy Clerk



EARLY SULLIVAN
WRIGHT
GIZER &
McRAE LLP
ATTORNEYS AT LAW

COMPLAINT AND DEMAND FOR JURY TRIAL