

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF NEW
HAMPSHIRE, *et al.*,**

Plaintiffs,

v.

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

STIPULATION OF FACTS

IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiffs League of Women Voters of New Hampshire, League of Women Voters of the United States, Nancy Marashio, James Fieseher, and Patricia Gingrich, and Defendants Lingo Telecom, LLC, Voice Broadcasting Corporation, and Life Corporation, that the declarations submitted in support of and opposition to the Amended Motion for Preliminary Injunction, and that the documents submitted as exhibits in support of and opposition to the Amended Motion for Preliminary Injunction, may be relied upon and considered by the Court as evidence for the limited purpose of resolving Plaintiffs' Amended Motion for Preliminary Injunction. The parties reserve all rights, and waive none, to contest the truth, authenticity, and/or admissibility of any such declaration or document at any other stage of this litigation. As a result, the parties agree that the July 31, 2024 hearing on Plaintiffs' Amended Motion for Preliminary Injunction will focus exclusively on oral argument from the parties, without the need for additional testimony. A copy of the below-listed Joint Exhibits will be provided to the Court at the hearing.

Specifically, the parties hereby stipulate and agree that, for the limited purpose of resolving Plaintiffs' Amended Motion for Preliminary Injunction:

1. **Joint Exhibit 1** is an authentic copy of an audio file, which reflects the robocall

that was disseminated to New Hampshire voters two days before the New Hampshire Primary. Defendant Voice Broadcasting Corporation reviewed and edited the audio of the robocall to include a callback number prior to its dissemination to New Hampshire voters.

2. **Joint Exhibit 2** is an authentic copy of the Notice of Apparent Liability for Forfeiture, *In the Matter of Steve Kramer*, FCC File No.: EB-TCD-24-00036094 (released May 24, 2024).

3. **Joint Exhibit 3** is an authentic copy of the Notice of Apparent Liability for Forfeiture, *In the Matter of Lingo Telecom, LLC*, FCC File No.: EB-TCD-24-00036425 (released May 28, 2024).

4. **Joint Exhibit 4** is an authentic copy of a cease-and-desist letter from the Anti-Robocall Multistate Litigation Task Force to Life Corporation dated February 6, 2024.

5. **Joint Exhibit 5** is an authentic copy of a cease-and-desist letter from the FCC to Lingo dated February 6, 2024.

6. **Joint Exhibit 6** is an authentic copy of a February 6, 2024 FCC Robocall Enforcement Notice sent to all U.S.-based voice service providers.

7. **Joint Exhibit 7** is an authentic copy of the notice letter sent by the Anti-Robocall Multistate Litigation Task Force to Lingo Telecom, LLC on November 3, 2023.

8. **Joint Exhibit 8** is an authentic copy of the Cease-and-Desist Demand sent by the Federal Trade Commission to Matrix Telecom, LLC on August 23, 2022.

9. **Joint Exhibit 9** is an authentic copy of the Citation sent from Deputy Chief Kurt Schroeder of the FCC Enforcement Bureau to Life Corporation on July 29, 2003.

10. **Joint Exhibit 10** is an authentic copy of a May 23, 2024 press release by New Hampshire Attorney General John Formella announcing the indictment of Steve Kramer.

11. **Joint Exhibit 11** is an authentic copy of a declaration by Kathleen Sullivan dated April 12, 2024.

12. **Joint Exhibit 12** is an authentic copy of a declaration by James Fieseher dated March 31, 2024.

13. **Joint Exhibit 13** is an authentic copy of a declaration by Patricia Gingrich dated April 9, 2024.

14. **Joint Exhibit 14** is an authentic copy of a declaration by Nancy Marashio dated April 10, 2024.

15. **Joint Exhibit 15** is an authentic copy of a declaration by Elizabeth Tentarelli dated April 11, 2024.

16. **Joint Exhibit 16** is an authentic copy of a declaration by Celina Stewart dated April 17, 2024.

17. **Joint Exhibit 17** is an authentic copy of a declaration by Jeff Fournier dated May 16, 2024.

18. **Joint Exhibit 18** is an authentic copy of a Voice Broadcasting Corp Lease Agreement, dated April 19, 2010, which was attached as Exhibit A to the May 16, 2024 Declaration of Jeff Fournier.

19. **Joint Exhibit 19** is an authentic copy of a declaration and corresponding exhibits from Paul Carpenter dated April 11, 2024.

20. **Joint Exhibit 20** is an authentic copy of excerpts from the Examination Before Trial of Steve Kramer taken on March 21, 2023, in *Sarah Tirschwell for Mayor, Inc. v. Kramer*, No. 154123/2021 (N.Y. Sup. Ct.).

21. **Joint Exhibit 21** is an authentic copy of the Summons and Verified Complaint filed

against Steve Kramer in *Sara Tirschwell for Mayor, Inc. v. Kramer*, No. 154123/2021 (N.Y. Sup. Ct. Apr. 28, 2021).

22. **Joint Exhibit 22** is an authentic copy of the Decision + Order on Motion in *Tirschwell v. Kramer*, No. 154123/2021 (N.Y. Sup. Ct. Jan. 5, 2024).

23. **Joint Exhibit 23** is an authentic copy of a Summary of Enforcement Actions by the Social Security Administration, Office of the Inspector General (July 18, 2023).

24. **Joint Exhibit 24** is an authentic copy of a news article written by Laura Nahmias and Dana Rubinstein for Politico on May 1, 2019 titled “With taxpayer dollars flowing in, Konst’s public advocate campaign accused of fraud.”

25. **Joint Exhibit 25** is an authentic copy of a news article written by Derek B. Johnson for CyberScoop on February 14, 2024 titled “The tangled web of corporations behind the New Hampshire AI robocall.”

26. **Joint Exhibit 26** is an authentic copy of a news article written by Joseph Richardson and Scott Nishimura for Fort Worth Inc. on November 24, 2021 titled “Meet Our 2021 Entrepreneurs of Excellence.”

27. **Joint Exhibit 27** is an authentic copy of a news article written by Alex Seitz-Wald for NBC News on February 25, 2024 titled “Democratic operative admits to commissioning fake Biden robocall that used AI.”

28. **Joint Exhibit 28** is an authentic copy of a June 27, 2024 press release by the FCC announcing the letters sent to telecommunications companies seeking answers about the steps they are taking to prevent future fraudulent robocalls that use artificial intelligence for political purposes.

29. **Joint Exhibit 29** is an authentic copy of a February 8, 2024 FCC Declaratory

Ruling on the implications of AI technologies.

30. **Joint Exhibit 30** is an authentic copy of a letter from Lingo to Life Corp dated February 7, 2024.

STIPULATED AND AGREED TO BY:

/s/ Mark R. Herring

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