

Deposition Transcript

Case Number: 1:24-CV-00045-AW-ZCB

Date: December 19, 2024

In the matter of:

JEREMY B. HALES v LYNETTE MICHELLE LACEY, et al.

Jeremy B. Hales

VOL. II

**CERTIFIED
COPY**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

JEREMY B. HALES,

Plaintiff,

V.

Civil Action No.:
1:24-CV-00045-AW-ZCB

LYNETTE MICHELLE LACEY
ALEXIS PRESTON
and
JOHN COOK,

Defendants.

DEPOSITION OF JEREMY B. HALES
VOLUME II

TAKEN ON BEHALF OF: Defendants

DATE: December 19, 2024

TIME: 10:08 a.m. - 12:39 p.m.

PLACE: U.S. District Court
1 North Palafox Street
Pensacola, FL 32502

REPORTED BY: Liz Reyes, FPR-C
Notary Public
State of Florida at Large

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17 Court Coordinator

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5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X - VOLUME II

JEREMY B. HALES	PAGE
Direct Examination by Mr. Matzkin	299
CERTIFICATE OF OATH	406
CERTIFICATE OF REPORTER	407
ERRATA SHEET	408

DEFENDANTS' EXHIBITS

No.	PAGE MARKED
1 - Screenshot	---
3 - Screenshot	---
4 - Screenshot	---
5 - Screenshot	---
6 - Screenshot	---
7 - Screenshot	---
8 - Screenshot	---
9 - Screenshot	---
10 - Cease and Desist letter	387
11 - Screenshot	---
22 - Screenshot	---
25 - Screenshot	---
27 - List of media groups	---
28 - Screenshot	---
29 - Screenshot	---
30 - Screenshot	---
31 - Screenshot	---
32 - Screenshot	---
33 - Screenshot	---
34 - Color copied photo of trespass sign	---
35 - Screenshot	---
36 - Screenshot	---
37 - Screenshot	---
38 - Screenshot	---
39 - Screenshot	---
41 - Screenshot	---
42 - Screenshot	---
43 - Screenshot	---
44 - Screenshot	---
45 - Screenshot	---

1	INDEX (CONTINUED - VOLUME II)	
2	No .	PAGE MARKED
3	46 - Screenshot	---
	48 - Screenshot	---
4	49 - Screenshot	---
	50 - No exhibit	---
5	51 - Screenshot	---
	52 - Screenshot	---
6	53 - Screenshot	---
	54 - Screenshot	---
7	55 - Screenshot	---
	56 - Screenshot	---
8	57 - Screenshot	---
	58 - Screenshot	---
9	59 - Screenshot	---
	60 - Screenshot	---
10	61 - Screenshot	---
	62 - No Exhibit	---
11	63 - No Exhibit	---
	64 - No Exhibit	---
12	65 - Screenshot	---
	66 - Screenshot	---
13	67 - Screenshot	---
	68 - Screenshot	---
14	69 - Screenshot	---
	70 - Screenshot	---
15	71 - Screenshot	---
	72 - No Exhibit	---
16	73 - No Exhibit	---
	74 - Discovery responses	375
17	75 - Discovery responses	375
	76 - Discovery responses	375
18	77 - Complaint	360
	78 - Email from Lynette Preston dated 8-22-23	
19	to Nancy Holdsworth	299
	79 - Screenshot	303
20	80 - Screenshot	306
	81 - Screenshot	310
21	82 - Gofundme document	312
	83 - Court Order of Dismissal	---
22	84 - Screenshot	315
	85 - Screenshot	321
23	86 - Screenshot	324
	87 - Screenshot	326
24	88 - Screenshot	329
	89 - Screenshot	333
25	90 - Screenshot	342

1	INDEX (CONTINUED - VOLUME II)	
2	No .	PAGE MARKED
3	91 - Screenshot	344
	92 - Screenshot	346
4	93 - Screenshot	347
	94 - Screenshot of David's Post	349
5	95 - Screenshot	351
	96 - Screenshot	352
6	97 - Transcript of 12-2-24	---
	98 - No exhibit	---
7	99 - Affidavit of Melissa Lemmerman	353
	100 - Affidavit of Jeremy B. Hales	358
8	101 - 12-8-24 Live Stream "That Umbrella Guy	386
	102 - 5-21-23 Live Stream "What The Hales"	396
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 (Proceedings continue from Volume I)

2 THE COURT: Good morning everyone. We're
3 here today for a partial redeposition in the matter of
4 Hales vs. Preston. Case Number 1:24-CV-45. Mr. Hales
5 is present with Mr. Shochet. Mr. Matzkin is present on
6 behalf of the defendants. So Mr. Hales, would you go
7 ahead and take the witness stand here beside me.
8 There's a water bottle up here for you.

9 And then Mr. Matzkin, you can remain at
10 counsel table there to ask questions. I understand
11 you're giving him an exhibit book. But if at any time
12 you need to show him something, the Elmo is there in
13 front of you at the lectern and you can use that and
14 Mr. Hales and Mr. Shochet will be able to see what is in
15 front of you. Make sure that everyone --

16 CLERK: For the court reporter, it may be
17 best if they're at the lectern to ask the questions.

18 THE COURT: Okay. Mr. Matzkin, actually,
19 it sounds like for the court reporter, it may be better
20 if you come to the lectern to ask your questions. So
21 you don't need to do that yet, but when you're ready to
22 start questioning, if you would come to the lectern.
23 That would be most helpful to the court reporter.

24 Everyone please make sure that you speak
25 clearly for the benefit of the court reporter. We're

1 not going to speak over one another.

2 Mr. Hales, make sure that you wait for
3 Mr. Matzkin to finish asking a question and then you can
4 begin. And then Mr. Matzkin, you need to make sure that
5 Mr. Hales has finished his answer until you ask your
6 next question. We're not going to have interrupting.
7 That makes it very difficult for the court reporter.

8 And so I just encourage you to take a pause
9 between the answering the question to allow the court
10 reporter to make sure she has everything down.

11 So we're going to proceed as though this is
12 a normal deposition. That means that if there is an
13 objection, Mr. Shochet will make the objection for the
14 record and then the witness will answer unless the basis
15 for the objection is privileged, in which point
16 Mr. Shochet may instruct the witness not to answer.

17 And just so we're all clear, privilege is
18 the only basis on which a witness may not answer a
19 question during a deposition.

20 As I mentioned in our prehearing
21 discussion, if you have an objection to form, please
22 object to form and then succinctly say a basis. No need
23 for a speaking objection, but something such as
24 objection to form, leading, or objection, form compound
25 question, that helps me greatly at a later date if I

1 have to rule on the objections in the deposition.

2 I want you to just -- everyone to just
3 pretend as though I'm not here. I do not intend to
4 intervene. I intend to be a potted plant and to simply
5 make sure that things go appropriately in this
6 deposition. I expect that they will and I don't think
7 we'll have any problems. I don't think I'll need to
8 intervene, but if there are problems, I will intervene.

9 No one needs to ask me to intervene. I
10 don't want to be asked to intervene. If I think I need
11 to intervene, I will. Again, I don't think I'll need
12 to, but as I mentioned to the parties and before we came
13 into court, because we are here in the courtroom and I
14 am present, my summary criminal contempt authority
15 applies under Title 28, United States Code §636(e)(2).
16 I certainly don't have to use it, but if necessary, I
17 will.

18 Mr. Matzkin, we've set aside two hours for
19 your questioning of Mr. Hales. And that two hours does
20 include breaks. So if you need a break at any point,
21 Mr. Hales, you ask for a break. Mr. Matzkin, if you
22 need a break or Mr. Shochet, you need a break, just ask
23 for it. We'll take a brief recess.

24 Also, if you need more water or anybody
25 needs more water, we can get you more water. Any

1 questions, Mr. Matzkin, before we begin?

2 MR. MATZKIN: No, thank you.

3 THE COURT: Mr. Shochet?

4 MR. SHOCHET: Briefly, just because we're
5 in a courtroom, you're definitely not a potted plant.
6 Do I need to stand for objections?

7 THE COURT: You may -- since I'm not going
8 to be ruling on it, you can just object. Make sure that
9 you just do it loud enough for the court reporter to
10 hear. And Madam Court Reporter, if you need anybody to
11 slow down or you need anybody to pause or you don't hear
12 anybody, just let us know, okay?

13 COURT REPORTER: Thank you.

14 THE COURT: Mr. Hales, any questions?

15 MR. HALES: No, sir.

16 THE COURT: All right. So Mr. Hales,
17 you'll need to be sworn, I imagine. So Mr. Matzkin, I'm
18 just going to turn it over to you. You pretend I'm not
19 here and run a deposition as you would take depositions.
20 Whenever you're ready.

21 MR. MATZKIN: Thank you. Can you swear the
22 witness, please.

23 COURT REPORTER: Sir, would you raise your
24 right hand, please. Do you swear or affirm that the
25 testimony you shall give in this cause today shall be

1 the truth, the whole truth, and nothing but the truth?

2 THE WITNESS: I do.

3 JEREMY B. HALES

4 was called as a witness and, after having been first
5 duly sworn, was deposed and testified as follows:

6 DIRECT EXAMINATION

7 BY MR. MATZKIN:

8 Q Good morning, Mr. Hales. You have in front
9 of you a pile of exhibits, correct?

10 A Yes.

11 Q And can you look at Exhibit 78, please. Do
12 you have that in front of you?

13 A Yes.

14 (Defendants' Exhibit Number 78 was marked
15 for identification.)

16 BY MR. MATZKIN:

17 Q Do you claim that this exhibit contains a
18 defamatory statement about you?

19 MR. SHOCHET: Objection to form;
20 competency.

21 BY MR. MATZKIN:

22 Q Do you want me to rephrase the question?

23 A I would like time to actually read it.

24 (Witness reviewing.)

25 A I'm done reading if you'd like to proceed.

1 BY MR. MATZKIN:

2 Q Do you claim this exhibit contains a false
3 statement about you?

4 A Yes.

5 Q What is the false statement?

6 A I see multiples.

7 Q What is one of them?

8 A Bullied our town clerk into a stroke.

9 Q What is another one of them?

10 A Bullied and belittled and humiliated,
11 destroyed my tortoise rescue with total lies.

12 Q And what is another one, if any?

13 A Called CPS with false allegations seven
14 times.

15 Q Did you not call CPS?

16 A I called CPS one time over a concern that I
17 had.

18 Q Is there any other false statements in this
19 exhibit?

20 A All because I ran for a seat he thought I
21 might get over Therese Granger, who at the time I
22 thought was my friend.

23 Q Any others?

24 A Everything he said about the people in
25 Otter Creek is a lie.

1 Q Any others?

2 A Not about me.

3 Q And how has the -- those false statements
4 damaged you or caused you harm?

5 A The defamatory false statements have caused
6 loss in my business income.

7 Q So the statements in this exhibit you're
8 trying to loss of business income; is that correct?

9 A Correct.

10 Q And can you connect the dots? So how did
11 this -- these statements, the defamatory statements in
12 Exhibit 78 lead to lost business for you?

13 A Once publicly defamatory statements are
14 said about myself, others came to believe those
15 defamatory statements thus injuring and decreasing my
16 overall income of my businesses.

17 Q And do you have any evidence to make that
18 connection or is that your characterization of it?

19 A I don't understand your question.

20 Q Do you have any evidence to tie the loss of
21 business to the false statements in this exhibit?

22 A Loss of income.

23 Q Do you have any evidence to show that the
24 loss of income was caused by these statements?

25 A Yes, evidence will be shown.

1 Q What is the evidence?

2 A Loss of income.

3 Q So your evidence of loss of income is loss
4 of income?

5 A Yes.

6 Q And your evidence that the loss of income
7 was caused by the defamatory statements in Exhibit 78 is
8 the loss of income?

9 MR. SHOCHET: Objection, form.
10 Conclusionary -- calls for conclusion. It's actually
11 for the jury to decide that.

12 BY MR. MATZKIN:

13 Q Strike that. Let me repeat the question or
14 rephrase the question.

15 Is your evidence that you lost income due
16 to the defamatory statements in Exhibit 78 anything more
17 than the fact that you lost income?

18 A My evidence of loss of income will be based
19 on the totality of the defamatory statements from your
20 clients.

21 Q Okay. Let me move on. Was this forwarded
22 to you by Nancy Holdsworth?

23 A I don't recall.

24 Q You don't recall how you learned of this
25 email being sent?

1 A I recall how I learned of it.

2 Q And how did you learn of it?

3 A The mayor of Peninsula, Ohio called me and
4 stated that he received an email.

5 Q But he didn't receive this email, did he?

6 A The mayor of Peninsula, Ohio called me and
7 stated that he received this email.

8 Q And then did he forward it to you?

9 A That, I don't recall either.

10 MR. MATZKIN: Let's look at Exhibit 79,
11 please.

12 (Defendants Exhibit Number 79 was marked
13 for identification)

14 A If we may go back to Exhibit --

15 BY MR. MATZKIN:

16 Q No. So Exhibit 79. Are these comments
17 under a Facebook post?

18 A Yes.

19 Q Do you claim that this Exhibit 79 contains
20 any defamatory statements about you?

21 A Yes.

22 Q And can you tell me what those are?

23 A Jeremy calling John the filthy gay names.

24 Q So the nil comment, Jeremy calling John the
25 filthy gay names, that's you identifying a defamatory

1 statement in Exhibit 79?

2 A Yes.

3 MR. SHOCHET: Objection, competency, but
4 you can answer.

5 BY MR. MATZKIN:

6 Q Who is Charles Green?

7 A I am unaware.

8 Q Who prepared this exhibit?

9 A I don't recall.

10 Q Who provided this to you?

11 A I don't recall.

12 Q Is it a screenshot from your phone?

13 A I don't recall.

14 Q Was it attached to a message you received
15 from somebody?

16 A I don't recall.

17 Q What was the original post under which
18 these comments were made?

19 A I don't recall.

20 Q What other comments were under the original
21 post?

22 A I don't recall.

23 Q Why does the bottom comment not indicate
24 how long ago it had been left, whereas the two above
25 indicate two minutes and four minutes?

1 A I don't recall.

2 Q How do you plan to authenticate Exhibit 79?

3 MR. SHOCHET: Objection; competency. You
4 can answer.

5 A That would be a conversation between myself
6 and my lawyer.

7 BY MR. MATZKIN:

8 Q Do you know where the origin of Exhibit
9 79 -- what was the origin of your receipt of Exhibit 79?

10 A I don't recall.

11 Q Do you recall if you received it from
12 somebody or do you recall if it was given to you by a
13 lawyer?

14 A I don't recall.

15 Q Do you know if it's real or fabricated?

16 A I do know it's real.

17 Q How do you know it's real?

18 A How would it be fabricated?

19 Q Well, is it possible for somebody to take a
20 piece of paper and create what looked like comments on
21 Facebook without original posts? Is that not
22 possible?

23 A Not to my knowledge.

24 Q Okay. In any event, you can't sit here and
25 testify as to how you came into possession of this

1 document; am I right?

2 A I don't recall.

3 MR. MATZKIN: Exhibit 80, please.

4 (Defendants' Exhibit No. 80 was marked for
5 identification.)

6 BY MR. MATZKIN:

7 Q Do you have Exhibit 80 in front of you?

8 A Yes.

9 Q Do you claim this exhibit contains a
10 defamatory statement about you?

11 MR. SHOCHET: Objection; competency.
12 Objection to form. You can answer.

13 A I have to read it first.

14 (Witness reviewing.)

15 A Yes.

16 BY MR. MATZKIN:

17 Q What is the defamatory statement within
18 Exhibit 80?

19 A Jeremy attacked John. Jeremy is corrupt
20 just as -- or alluding to Jeremy is corrupt just as much
21 as the mayor.

22 Q Do you have any evidence as to how that
23 false statement caused you harm or damage?

24 A Loss of income.

25 Q Why wasn't this statement included in the

1 original Complaint that you filed in March?

2 A I don't know.

3 Q How do you plan to authenticate this
4 particular exhibit?

5 A That's another conversation for myself and
6 my legal representation.

7 Q Well, is that because you don't have
8 personal knowledge as to the origin of this exhibit, but
9 your understanding is that your attorney does have
10 knowledge as to how this exhibit came to be?

11 A No. It would be because there are so many
12 screenshots that have been taken from all of these
13 multiple Facebook accounts that is very difficult over
14 the matter of a year to remember where -- what came from
15 what. It would take a tremendous amount of time to then
16 go back to the metadata and bring it back up, which we
17 don't have in front of us.

18 Q You realize that this exhibit in and of
19 itself is unauthenticated and would likely be deemed
20 inadmissible because it doesn't have the original post
21 or any context or date or anything. You understand
22 that?

23 MR. SHOCHET: Objection to form.
24 Argumentative.

25 BY MR. MATZKIN:

1 Q I'll strike this. So my question is, do
2 you have a way to authenticate this exhibit as being an
3 actual comment that appeared on Facebook under the
4 original post?

5 A Yes.

6 Q And how come you haven't prepared to
7 present the evidence today?

8 MR. SHOCHET: Objection, form.
9 Argumentative.

10 A (No response.)

11 BY MR. MATZKIN:

12 Q How come you haven't -- how come you're not
13 prepared to present evidence today of the authenticity
14 of Exhibit 80?

15 A I was not led to be known that I was going
16 to need to prepare by yourself.

17 Q Was this sent to you by somebody as a
18 private message?

19 A Most likely that it was screenshot by
20 Martha Rizk and kept in a file forthwards.

21 Q I see. And then you had access to that
22 file so you could pick out things that you felt were
23 defamatory to support your lawsuit?

24 A My legal representation has access to that
25 file and it could pick out things that he finds

1 defamatory in the lawsuit.

2 Q So Martha Rizk prepared this exhibit,
3 correct?

4 A Correct.

5 Q Why is the -- why isn't there the original
6 post under which this comment was posted?

7 A I don't know.

8 Q Why is my client Lynette Michelle Preston's
9 comment cut off at the bottom?

10 A Because somebody didn't click on see more.

11 Q Do you think that it might be relevant to
12 see more of what's in that comment?

13 A If you're asking what I think, I think it's
14 probably more defamatory, if anything.

15 Q And why now, if you're going to present the
16 comment like in Exhibit 80, show the post under which it
17 appeared originally as well as all the other comments
18 under that post? Why not show that stuff?

19 A Because I didn't take the screenshot, I'm
20 not able to answer that question.

21 Q Did you have the ability to tell -- did you
22 have the ability to tell Martha Rizk, hey, this looks
23 good, but we need the rest of it? Can you go back and
24 screenshot the full post?

25 A You're asking about ability?

1 Q I'm asking you, was there any reason you
2 could not have had the exhibit prepared with the full
3 post in all the other comments?

4 A I expect we can still do that. It was
5 posted online. Online is forever. We can go back to
6 the metadata and we can have the full post.

7 Q But then we may have to have a whole other
8 deposition.

9 MR. SHOCHET: Objection to form;
10 argumentative.

11 A (No response.)

12 BY MR. MATZKIN:

13 Q In any event, let's move on to Exhibit 81.
14 Do you have Exhibit 81 in front of you?

15 A Yes, I do.

16 (Defendants' Exhibit Number 81 was marked
17 for identification.)

18 BY MR. MATZKIN:

19 Q Do you claim that this exhibit contains a
20 defamatory statement about you?

21 MR. SHOCHET: Objection, form. Competency.

22 BY MR. MATZKIN:

23 Q Strike that. Mr. Hales, when I say -- when
24 I ask you, do you know if an exhibit contains a
25 defamatory statement, do you understand that that means

1 a false statement?

2 MR. SHOCHET: Objection to form;
3 argumentative.

4 BY MR. MATZKIN:

5 Q Mr. Hales, do you understand when I ask
6 about a defamatory statement, I'm asking you to identify
7 false statements about you?

8 A May I please have a moment to actually read
9 the document and the exhibit?

10 Q But I am asking you a question generally.
11 When I ask you if there's a defamatory statement, is
12 your understanding that I'm asking you to identify false
13 statements about you?

14 A My apologies, but I'm still on your
15 previous question, is there defamatory statement within
16 this exhibit and I've not been able to read it because
17 I've been interrupted.

18 Q I've withdrawn that question and my next
19 question is, do you understand that when I ask you to
20 identify a defamatory statement that I'm asking you to
21 identify false statements about you?

22 A Yes.

23 Q Okay. Next question is, in Exhibit 81, is
24 there any defamatory statement in there about you?

25 A No.

1 Q Do you claim that Exhibit 81 contains
2 evidence in support of any of your claims in this
3 lawsuit?

4 MR. SHOCHET: Objection to form;
5 competency.

6 A Yes.

7 BY MR. MATZKIN:

8 Q What within Exhibit 81 do you consider
9 evidence?

10 MR. SHOCHET: Same objection.

11 A The aspect of defamation of my character;
12 therefore, also trying to destroy my businesses and dox
13 my physical address, which I purchased to remove and
14 protect myself from individuals such as Lynette Michelle
15 Preston and John Cook.

16 And so this is doxing of my address
17 allowing people to know exactly where I am, exactly
18 where everything I own is, and undermining my security
19 and my own protection online.

20 MR. MATZKIN: Exhibit 82.

21 (Defendants' Exhibit Number 82 was marked.)

22 BY MR. MATZKIN:

23 Q Is this a gofundme?

24 A (Witness reviewing document.)

25 Q Does it say gofundme.com at the top,

1 Mr. Hales?

2 A Yes, it does.

3 Q Okay. What does the top left mail 10:16
4 a.m. Friday, September 13 indicate? When you received
5 it or --

6 A That, I do not recall.

7 Q You don't know what that date and time
8 suggests?

9 A Date and time suggests the date and time.

10 Q Okay. Fair enough. Do you claim this
11 exhibit contains any defamatory statements about you?

12 A Is there potential of having a highlighter
13 or a pen so that I can mark each statement or are we
14 going to go through this paragraph by para- -- this is a
15 lot to digest.

16 Q Mr. Hales, why don't you read, and when you
17 come across a sentence that's defamatory, you can
18 articulate.

19 A "I am being stalked." Defamation. That is
20 in regards to myself.

21 Q Okay. Which paragraph?

22 A It's paragraph number one. "It's been
23 going on for over two and a half years." That is also
24 false.

25 Q Okay. What about in the second

1 paragraph?

2 A I'm still on the first paragraph. My
3 grandson's life is being destroyed all for views on
4 YouTube. That is in regards to me. The stalking
5 monster, that's in regards to me. Getting rich off of
6 hurting people, that's in regards to me. That he feels
7 are beneath him in every way, that's in regards to me
8 and defamatory.

9 Paragraph two, making sure we don't get
10 donations to our turtle rescue, that's in regards to me
11 and untrue. Making sure they keep us in court for made
12 up staged unreal garbage, that's defamatory and untrue.
13 Filing so much garbage slowing down the case so they
14 will make more money off of us, that's defamatory and
15 untrue. My grandson is being stalked and lied about,
16 that's in regards to me. That's untrue.

17 Q Okay.

18 A I'm not done, Counselor. Paragraph number
19 three. Paragraph number three, my heart aches with what
20 he has done to us. I've done nothing. So that is
21 defamatory and untrue.

22 Q Okay. That's fine. I appreciate it.

23 A I'd like to still go --

24 Q No, that's fine. I've heard enough
25 defamatory comment from Exhibit 82. And what I'd like

1 to ask you, though, is your name mentioned in here
2 anywhere?

3 A With all due respect, Counselor, you didn't
4 let me finish reading. So may I take a moment to finish
5 reading?

6 Q If you're reading to determine the answer
7 to my question, which is whether your name appears in
8 it.

9 A (Witness reviewing document.)

10 Q Just a simple yes or no. Does your name
11 appear in Exhibit 82?

12 A I'm still reading. My actual name does not
13 not appear in Exhibit 82, but reference to me in regards
14 to YouTube absolutely does appear.

15 Q Okay. So the answer, does your name appear
16 in Exhibit 82 is no, correct?

17 A My answer is there is reference to me,
18 yes.

19 Q Does your name actually appear in the
20 exhibit; yes or no?

21 A The name Jeremy Hales does not appear
22 reference to Jeremy Hales.

23 MR. MATZKIN: Okay. Let's go -- we can
24 skip Exhibit 83 and we'll go to Exhibit 84, please.

25 (Defendants' Exhibit Number 84 was marked

1 for identification.)

2 BY MR. MATZKIN:

3 Q How did you obtain Exhibit 84?

4 A It was messaged to me.

5 Q By whom?

6 A That, I don't recall.

7 Q So somebody -- strike that. Is it your
8 understanding that the person who messaged these to you
9 was the person with whom Lynette Michelle Preston had
10 the conversation from these messages?

11 A No.

12 Q What is your understanding then as to the
13 origin of these messages?

14 A The person that sent these messages to me
15 stated that they were friends with another female that
16 Lynette Preston met in a battered women group and the
17 female sent her money, and Lynette Preston engaged in
18 this conversation with this female. This female was
19 concerned and sent it to another individual who then
20 send it to me.

21 Q And who was the other individual that sent
22 it to you?

23 A I don't remember the name.

24 Q What was the name of the individual in the
25 battered women's shelter that sent it to the individual

1 whose name you can't remember?

2 A If given the appropriate time, I can
3 provide all of that information, but I was not prepared
4 to give those answers today. So I don't remember the
5 name.

6 Q What is -- do you claim that this exhibit
7 contains false statements about you, defamatory
8 statements about you?

9 A "YouTube fag man."

10 Q Is that it?

11 A Still reading. "Jeremy almost ran over our
12 sweet little baby."

13 Q Uh-huh.

14 A "Bitch boy had a slave call 911."

15 Q All right. That's pretty much the end,
16 right?

17 A I'm not done yet. Stating that they have a
18 restraining order on me.

19 Q Okay. Now, these were private messages, am
20 I right, from Michelle -- Lynette Michelle Preston sent
21 to somebody private messages, correct?

22 A I can't answer that because I'm not the
23 individual that it was sent to.

24 Q Well, you're familiar with what private
25 messages screenshot looked like versus Facebook posts

1 like we've already covered, right?

2 A I can't answer it as I was not the person
3 that this message was sent to.

4 Q Well, other than a private message, what
5 possibly can this reflect?

6 A I can't answer that as I'm not the one this
7 was sent to. It was sent to me after it was sent to
8 that individual.

9 Q And the person who gave it to you, was that
10 by a -- you said it was a private message sent to you
11 with these attached, these screenshots?

12 A I do recall it was sent through Instagram
13 and I don't believe you attached an Instagram. I
14 believe it's inserted. So in regards to an attachment
15 what you would think about on an email, no. Inserted,
16 yes.

17 Q Okay. And your testimony is you do not
18 know either the -- well, you do not know the person --
19 you can't recall the individual who gave this to you?

20 A Not currently, but I still have the
21 messages in my Instagram; but I was unprepared to give
22 this answer today, which I can come up with that
23 individual.

24 Q Now, in your summary judgment opposition,
25 you list -- the exhibits we're going over are from the

1 summary judgment opposition. And for this one, you
2 allege that it was posted. But this is not posted; am I
3 correct? Private messages aren't posted, correct?

4 A Can I see it?

5 MR. SHOCHET: Objection to form.
6 Foundation. Go ahead.

7 THE WITNESS: Sorry.

8 BY MR. MATZKIN:

9 Q Are private messages posted?

10 A So you're asking a question about a summary
11 judgment, which I don't have that in front of me to
12 answer the question.

13 Q I'm not asking you about that, Mr. Hales.
14 I'm asking you whether private messages are posted. Is
15 that the proper verb to describe how these were shown of
16 the -- or otherwise posted?

17 MR. SHOCHET: Objection to form.
18 Foundation. Lacks foundation.

19 A Again, I don't know exactly how these were,
20 whether there was a private message or a paid public
21 posting. I would have to go back to the source.

22 BY MR. MATZKIN:

23 Q I got you, but I'm going to ask you to
24 assume that it's a private message. And therefore, if
25 we assume it's a private message, would you agree with

1 me that it's not posted anywhere?

2 MR. SHOCHET: Objection to form. Calls for
3 speculation. You can answer.

4 A I would agree that it is posted. If it's a
5 message that is sent through any app or anywhere online,
6 it's posted somewhere to someone, and that data never
7 ever disappears. There's nothing private about it. It
8 is posted. Can you clarify --

9 BY MR. MATZKIN:

10 Q Yeah.

11 A -- what you mean by posting?

12 Q So you're using the word posted to describe
13 even just the message from person A to person B, private
14 message, because there's metadata, whatever that's
15 posted from the person who sent it to the person who
16 received it, correct?

17 A Correct. It's posted. It's online
18 forever.

19 Q But it's not posted on a publicly available
20 page or anywhere else that anybody can see other than
21 the person who received it; am I right?

22 A Or who has access to it, yes.

23 Q Okay. Any idea of the date of these
24 messages?

25 A I can provide the date when given the

1 opportunity beforehand to prepare.

2 Q Today is an opportunity. So do you know
3 the date that these messages were sent?

4 A I can provide the date at a later date.

5 Q Do you know when you received those from
6 some unidentified individual?

7 A I do not recall currently.

8 MR. MATZKIN: Let's go to Exhibit 85.

9 (Defendants' Exhibit Number 85 was marked
10 for identification.)

11 BY MR. MATZKIN:

12 Q And again, this would appear to be a
13 private message; am I right?

14 MR. SHOCHET: Objection. Competency. You
15 can answer.

16 A (No response.)

17 BY MR. MATZKIN:

18 Q Mr. Hales, are you familiar with Active Now
19 under the name, the little phone icon, the video icon,
20 the little "i,"? That's what you see in a Facebook
21 messenger chat, correct?

22 A Counselor, I'm still reading to answer your
23 first question of what this is. If I could please be
24 given the opportunity to read your exhibit.

25 A I don't recall if this is a private message

1 or public posting.

2 Q Well, if you look at the top of the
3 exhibit, it has the Active Now, the little phone icon,
4 the little video icon for video calls. Isn't that what
5 you see in a private messenger chat?

6 A To be frank, I've never paid that close of
7 attention.

8 Q Did you ever see those icons above
9 somebody's comment on a Facebook post?

10 A Again, to be frank, I've never paid that
11 much attention.

12 Q Okay.

13 A But for the sake of the exhibit, we can say
14 this is a private message.

15 Q And do you recall how you received this
16 private message?

17 A I believe Michael Dean sent this to me, but
18 I don't want to go on record one hundred percent.
19 Again, I would have to go back and reference everything
20 that has been sent and screenshot and documented. But
21 to my best recollect, Michael Dean sent this to me.

22 Q And who is Michael Dean?

23 A Another individual who Lynette would
24 communicate with.

25 Q And do you recall how you received this

1 from Mr. Dean? Was it attached as an attachment to a
2 message from him to you?

3 A Most communication through Mr. Dean came
4 through Facebook messenger.

5 Q And so this would have had to have been
6 sort of cut and pasted from a message to you -- from him
7 to you, right? Or strike that. Is it your
8 understanding that this was a message received by him
9 that he shared with you? In other words, Lynette
10 Preston was communicating with Mr. Dean?

11 A Yes. Lynette Preston was communicating
12 with Michael Dean.

13 Q Okay. So your understanding is that he
14 received this original message from Ms. Preston. We
15 decided to wait and shared it with you?

16 A Yes.

17 Q Okay. And please tell me in there what is
18 defamatory, if anything?

19 A He's evil. He's a cult leader. He tells
20 them God is telling him that it's time to kill and bring
21 to death the evil messenger. That's the bad neighbors.

22 Q Do you deny saying --

23 A I'm still reading, sir.

24 Q Sorry.

25 A I'm finished now.

1 Q And do you deny having said anything like
2 that, similar to that on YouTube ever?

3 A Yes.

4 Q You deny you've ever said anything like
5 that?

6 A Yes.

7 MR. MATZKIN: Exhibit 86, please.

8 (Defendants' Exhibit Number 86 was marked
9 for identification.)

10 BY MR. MATZKIN:

11 Q Do you have Exhibit 86 in front of you?

12 A Yes.

13 Q Do you claim this contains a defamatory
14 statement about you?

15 A The aspect where she states they're --
16 "when they fake pictures and stuff, they're doing that
17 copying and pasting things in and out of posts to make
18 it look like we're creating hate speech."

19 Q That's the defamatory statement?

20 A It's untrue.

21 Q And is your name in here?

22 A My name is not in there. My name is
23 referenced on all of it.

24 Q Why is there a icon -- it's under the
25 sticker of Supa Dave on this screenshot?

1 A I cannot see what's under the sticker.

2 Q Well, under the sticker is a Supa Dave,
3 Middleton's best icon. You know who that is, right?

4 A I actually don't see anything under the
5 sticker except the sticker.

6 Q Can you see a little half circle underneath
7 it?

8 A Could you please point on the projector
9 what you're referring to?

10 Q Yeah. Certainly.

11 A I can't distinguish what that is.

12 Q Well, I'm telling you it's an icon from
13 Supa Dave from Middleton's best YouTube channel. And
14 I'm asking you whether you would have any explanation.

15 A I honestly have no idea what you mean by
16 explanation.

17 Q Well, my question is why would you be
18 producing this exhibit with an icon of a YouTube channel
19 Supa Dave, Middleton's best on it as opposed to without
20 that?

21 A You have thoroughly confused me. I am not
22 sure what you're asking, to be honest.

23 Q I'll move on.

24 MR. MATZKIN: Exhibit 87, please, which is
25 a three-page stapled exhibit.

1 (Defendants' Exhibit Number 87 was marked
2 for identification.)

3 BY MR. MATZKIN:

4 Q Do you claim that Exhibit 87 contains a
5 defamatory statement about you?

6 A Page three states that I destroyed a
7 disabled woman's and a disabled child's life. That's
8 defamatory.

9 Q That's the middle of the three comments?

10 A Yes.

11 Q Any others?

12 A That is the only one that I see.

13 Q And is your name mentioned?

14 A Very first page, Otter Creek. Jeremy
15 Hales, Coward of Levy County.

16 Q Is your name mentioned on the third page?

17 A Bottom of the first page, "This page is for
18 Ex fans of What the Hales," my last name.

19 Q My question is: On the third page, is
20 there any mentioned?

21 A I'm getting to the third page. Second
22 page, para three --

23 Q I didn't ask about the second page.

24 A -- Jeremy Hales up top. Further down,
25 Jeremy Hales, coward of Levy County.

1 Q Mr. Hales, I'm only asking about the third
2 page.

3 A Page three, coward of Levy County is in
4 reference to me as is already stated in this document,
5 Otter Creek, Jeremy Hales, coward of Levy County.

6 Q Who prepared this exhibit?

7 A The middle of this page, YouTuber is a
8 reference to me, Jeremy Hales.

9 Q Mr. Hales, I do not want you to answer any
10 more questions about pages one or two. On page three,
11 who prepared the exhibit?

12 A Most likely Martha Rizk.

13 Q Why is the date typewritten 7/13/23 next to
14 the top comment?

15 A Because that would be the date when the
16 comment was made.

17 Q How do you know?

18 A Because that's when it was documented.

19 Q How do you know?

20 A Because she took screenshots of it and put
21 the date when it happened.

22 Q Who is she?

23 A Martha Rizk.

24 Q Why did she cobble together three comments
25 out of context on one page?

1 MR. SHOCHET: Objection to form. Calls for
2 speculation.

3 A I'm sure if we reference the metadata which
4 still exists, as this never disappears, is his comment
5 after his comment after his comment. It's not -- it is
6 a screenshot going all the way down.

7 BY MR. MATZKIN:

8 Q All right. So it's your testimony that
9 this is one single screenshot that shows three comments
10 in their natural --

11 A Yes.

12 Q -- state. Why was this -- why were the
13 original posts under which these comments appeared not
14 included in the exhibit?

15 MR. SHOCHET: Objection to form. Calls for
16 speculation. You can answer.

17 A As far as I can tell, it is. You've got
18 three pages here. Page one, Jeremy Hales, Otter Creek,
19 coward of Levy County. Going straight down, this is
20 three pages of one continuous screenshot all posted by
21 John Cook.

22 BY MR. MATZKIN:

23 Q I see. Okay. So those three pages on the
24 screen, this would just all flow one, two, three?

25 A Correct.

1 Q Okay.

2 MR. MATZKIN: Exhibit 88, which is also
3 three pages.

4 (Defendants' Exhibit Number 88 was marked
5 for identification.)

6 BY MR. MATZKIN:

7 Q Just referencing the first of the three
8 pages, is there a defamatory statement about you?

9 A The reference is defamatory in the aspect
10 of stating that my fiancée is sucking his cock.

11 Q Do you know why the O in the word cock has
12 like a pentagram within it? Did somebody doodle that?

13 A Yes, because it's an offensive word.

14 Q Did that come out like that on the
15 keyboard?

16 A No.

17 Q So somebody took a pen to that?

18 A I don't know.

19 Q Okay. Any idea what the date of this is?

20 A Given due time, I will go back to the
21 metadata and we'll give you the exact date. But as I
22 was not prepared for that today, I can't give you an
23 honest answer on the date.

24 Q If you could flip to page two of this
25 exhibit and can you tell me whose phone number is

1 on top?

2 A No, I can't.

3 Q Do you know if this is a screenshot or a
4 fabricated exhibit page two?

5 A There are no fabricated exhibits, so it's
6 screenshot.

7 Q So all of those appeared on the same
8 screenshot, right? In other words, this is one
9 screenshot, page two of all the comments that appear on
10 page two?

11 A Please clarify your question.

12 Q Yeah. Is page two a single screen shot
13 that shows all of that or were they cobbled together?

14 A I still do not understand your question.

15 Q Mr. Hales --

16 A It's a single screenshot on page two.

17 Q Thank you.

18 A Does that answer it?

19 Q Yes. Now, page two appears to be Facebook
20 comments, correct?

21 A Yes.

22 Q And page three also appears to have
23 Facebook comments. But also a private message at the
24 bottom, correct?

25 A Yes.

1 Q Did Angela Gleason contact you?

2 A Angela Gleason has emailed me multiple
3 times.

4 Q Who provided Exhibit 88 to you? Who
5 provided Exhibit 88?

6 A I would have to go back and find that out.
7 I don't recall.

8 Q Are these private messages between John
9 Cook and Elizabeth Failey, Liezzy Failey?

10 A What it looks like to me in Exhibit 88,
11 page one, it's a single screenshot that John Cook posted
12 somewhere on Facebook. Page two looks like it's
13 somebody private messaging screenshots. And page three
14 looks like it's somebody private messaging screenshots.

15 Q In the bottom, "I'm sorry but this should
16 all be taken into consideration," does that appear to be
17 a private message as opposed to a Facebook?

18 A Yes, as I just shared.

19 Q Why are the words different on page one
20 where it's referenced Georges, but on page two it's
21 referenced Martha's?

22 A Because Martha gave my attorney a copy
23 where she covered her name for her confidentiality and
24 put George's instead of Martha's, but John Cook actually
25 typed Martha's.

1 Q I see. So page one has actually been
2 altered. This is not an actual accurate screenshot
3 because the word Martha was changed to George's and the
4 O was drawn a pentagram inside, correct?

5 A And page two is correct, unaltered where it
6 says Martha's in a pentagram.

7 Q Right. My question is -- to be clear, page
8 one has -- is an image of an altered screenshot or
9 comment, correct?

10 A Page one is changing of the name for
11 confidentiality, nothing else, no context, no other
12 words in a pentagram and offensive letter.

13 Q Okay. So Martha George Rizk took the
14 screenshot and somehow changed the word Martha's to
15 George's and then this is the result we get, this
16 exhibit, right?

17 A Correct.

18 Q So Martha is able to make pretty
19 good-looking fake screenshots, isn't she?

20 MR. SHOCHET: Objection, form.
21 Argumentative. You can answer.

22 A I say no. The font obviously isn't the
23 exact same font. It doesn't look like anything else.
24 So in regards to saying that's talent, I would say
25 absolutely not. What she did was gave that to the

1 attorney to protect her own privacy, and looks like with
2 a pen, as you've stated earlier, put a pentagram inside
3 the letter O.

4 And if you call that incredible work, well,
5 I'm sorry. It doesn't work for me. It looks like she
6 was trying to not be offensive and protect her own first
7 name.

8 BY MR. MATZKIN:

9 Q Okay. So how was -- strike that. I'll
10 move on.

11 A But we do --

12 Q No question pending.

13 A -- have the original --

14 Q No question pending.

15 MR. MATZKIN: Exhibit 90, please --
16 Exhibit 89. I jumped the gun because I asked about
17 Angela Gleason. I was actually waiting for this.

18 (Defendants' Exhibit Number 89 was marked
19 for identification.)

20 BY MR. MATZKIN:

21 Q So you testified Angela Gleason has
22 contacted you on a number of occasions?

23 A Yes.

24 Q By email?

25 A Yes, to my recollection. To my best

1 recollection.

2 Q And any SMSs?

3 A What is an SMS?

4 Q In a phone message, text to text, phone to
5 phone.

6 A Well, I'm sure she has my number. To my
7 recollection, she has never texted me.

8 Q If she did, you would have a call -- a lot
9 of -- a lot of the texts?

10 A Absolutely.

11 Q Has she ever Facebook messenger -- do you
12 have Facebook messenger conversations with Angela
13 Gleason?

14 A Again, to my recollection, I would have to
15 go back through all my messages. I can't recall right
16 now if she's ever messaged out through Facebook.

17 Q What was your first contact with Angela
18 Gleason of any kind?

19 A I don't recall.

20 Q Do you recall what form it took?

21 A I don't recall.

22 Q Have you had live phone calls with her?

23 A No.

24 Q Never?

25 A Never.

1 Q Never a live conversation on the phone with
2 Angela Gleason?

3 A No.

4 Q Never met her in person?

5 A No.

6 Q So all just written messages?

7 A If she is contacted, it's been through
8 written messages.

9 Q And is it your testimony that she provided
10 this Exhibit 89?

11 A No.

12 Q Who provided this to your knowledge?

13 A This would be a screenshot, but most likely
14 Martha Rizk took it.

15 Q Do you know the original post it was under?

16 A Metadata still exists. We'll provide it.

17 Q Do you know any other comments that
18 appeared above it or below it?

19 A The metadata still exists. It never goes
20 away. We can provide it.

21 Q And how come they couldn't be included in
22 the exhibit to show the context of this supposedly
23 defamatory statement?

24 MR. SHOCHET: Objection to form,
25 argumentative. You can answer.

1 A My best guess is Martha Rizk never knew
2 that it needed to be to know that we were going to be in
3 federal court. And we asked about this. But the
4 metadata exists. We can provide all of that even though
5 it's been deleted by John Cook. The metadata always
6 exists on Facebook and we can retrieve it at any moment
7 in time. And we can get all comments before, all
8 comments after as well.

9 COURT REPORTER: Slow down, please.

10 BY MR. MATZKIN:

11 Q Is your testimony that this contains a
12 defamatory statement about you?

13 A "He makes his followers do his dirty work.
14 That's why we call him the coward of Levy County." This
15 is in complete total reference to me.

16 Q And what's the false factual comment?

17 A "He makes his followers do his dirty work."

18 Q Do you have any interpretation of those
19 words, what they mean?

20 A The defamatory statement is dirty work. It
21 would mean that I'm doing something inappropriate,
22 wrong --

23 Q So your testimony --

24 A -- not good, dirty, not clean. Uh, it
25 could go on and on and on in regards to what this

1 reference is by John Cook, your client.

2 Q Understood.

3 A So whether that be -- let's see. We've
4 looked at quite a bit of defamatory statements already
5 from John. I mean, we could look at those --

6 Q Mr. Hales, you've answered the question.
7 My next question is this. So your claim that this is
8 defamatory is based on your speculation as to what dirty
9 work is being referred to, correct?

10 MR. SHOCHET: Objection, form.
11 Argumentative.

12 A My claim is it's defamatory because it's
13 false.

14 BY MR. MATZKIN:

15 Q But what is the dirty work that is being
16 referred to here?

17 A We'll have an opportunity to ask John Cook
18 on the stand.

19 Q But you're claiming that this is a false
20 statement that caused you damage, and so I'm trying to
21 ascertain how the words, "he makes his followers do his
22 dirty work" caused you damage.

23 A You asked multiple questions in a row. Can
24 you focus in on one question?

25 Q How does the words, "he makes his followers

1 do his dirty work" cause you damages?

2 A It's defamatory; therefore, I lose income.
3 Individuals believe that I'm doing dirty things, dirty
4 work. Now I lose income based on that.

5 Q Can you identify these individuals who --
6 who would have given you income but no longer did
7 because they read "he makes his followers do his dirty
8 work"?

9 A Yes.

10 Q Who?

11 A I can provide screenshot after screenshot
12 after screenshot of individuals who have said they will
13 no longer support Jeremy Hales, Martha Rizk, What the
14 Hales, which is all over the internet right now. So I
15 can provide not hundreds; thousands.

16 Q Okay. Now, so for any one of those people
17 on Facebook that says, "We're no longer supporting What
18 the Hales," would that be the extent of your evidence of
19 damage?

20 MR. SHOCHET: Objection, form. You can
21 answer. It's competency.

22 BY MR. MATZKIN:

23 Q Would that be the extent of your evidence
24 that somebody wrote, "I no longer support What the
25 Hales"?

1 MR. SHOCHET: Same objection to form.

2 A No.

3 BY MR. MATZKIN:

4 Q What else? Would you then contact that
5 individual and ascertain how much they spent on What the
6 Hales stuff and then ascertain that they've stopped
7 spending money?

8 MR. SHOCHET: Same objection to form.

9 BY MR. MATZKIN:

10 Q Is that what you're planning on doing to
11 establish losses as a result of "he makes his followers
12 do his dirty work"?

13 MR. SHOCHET: Same objection to form.

14 BY MR. MATZKIN:

15 Q Do you understand my question?

16 A Honestly, no.

17 Q Okay.

18 A You're just going in circles.

19 Q So you just testified that there are
20 thousands of people on Facebook that have written that
21 they no longer support What the Hales because of things
22 that they've read and heard from my clients, correct?

23 A Yes.

24 Q All right. And so any one such comment by
25 any one individual, would you then take steps to follow

1 up with that individual and say, hey, how much did you
2 used to spend on What the Hales?

3 MR. SHOCHET: Same objection to form.

4 A I don't need to ask how much they would
5 have spent. I have all the analytics of what was, what
6 was going to be, and what currently is in regards to
7 income.

8 BY MR. MATZKIN:

9 Q Okay. And so, A, there are these
10 statements that you claim are defamatory; and B, you
11 claim to have lost income and so you're connecting A and
12 B, correct?

13 A Yes.

14 Q Thank you. But to be clear, you have not
15 followed up with any specific individual that you've
16 seen on Facebook saying they no longer support What the
17 Hales?

18 A I don't engage in improper communication
19 with individuals such as that.

20 Q So the answer is no, you haven't followed
21 up with any individuals who have claimed to no longer
22 support What the Hales, correct?

23 A My answer is I would never ever engage in
24 inappropriate conversation, communication such as that;
25 but we are hiring an expert who will evaluate loss of

1 income in its totality and we will be prepared to
2 present that.

3 Q And what would be improper if you read a
4 comment from Joe Smith that says, oh, wow, I read all
5 these terrible things by John Cook and Michelle Preston
6 about Jeremy Hales. I'm no longer supporting him. What
7 would be improper for you to contact Joe Smith and ask
8 him why he's no longer supporting you?

9 A I don't need to actually ask why they're no
10 longer supporting. They're literally stating it on
11 Facebook, on YouTube.

12 Q Okay.

13 A They're stating in the actual posting.

14 Q Well, what would be improper? What
15 would -- you said it would be improper communication.
16 And you said, I never engage in such improper
17 communication. So my question is, what would have been
18 improper -- what would be improper to contact somebody,
19 a stranger that you read a comment from on Facebook,
20 that talks about you?

21 A I don't find that proper communication. I
22 don't find that proper politeness. I don't find that
23 proper in any way.

24 Q Fair enough.

25 MR. MATZKIN: Exhibit 90, please.

1 (Defendants' Exhibit Number 90 was marked
2 for identification.)

3 BY MR. MATZKIN:

4 Q Do you claim that Exhibit 90 contains a
5 defamatory statement about you?

6 A Yes.

7 Q And what is that?

8 A I believe I heard from a very reliable
9 source -- let me back up -- John Cook. I believe I
10 heard from a very reliable source that the reason they
11 went to Egypt was to recruit some of George's/Martha's
12 family to bring them into Otter Creek because they
13 wanted to make the Arc into a radical Muslim mosque,
14 making Martha happy to have her family here so they can
15 always scream racist people are bothering them.

16 Q Okay. That whole thing is defamatory?

17 A Yes.

18 Q Okay. And is this a comment under a
19 Facebook post?

20 A It appears to be, yes.

21 Q Who prepared this exhibit?

22 A Most likely Martha Rizk.

23 Q Is there another person that might have
24 prepared an exhibit if it weren't her?

25 A Potentially Deanna West, but most likely

1 Martha Rizk.

2 Q Okay. Did Deanna West prepare some
3 exhibits, do you know?

4 A Again, you would have to give me that
5 question well before the deposition so I could actually
6 answer it appropriately to know which exhibit came from
7 which source. So I don't remember. There's just too
8 much.

9 Q Did you -- I sent all the exhibits a week
10 ago. Did you see them before today?

11 A I just looked at them today.

12 Q Did you receive them before today?

13 A No, I did not.

14 Q Do you know the original post under which
15 the comment --

16 A I apologize.
17 (Crosstalk.)

18 Q -- appeared?

19 A I did receive them via email.

20 Q When did you receive them?

21 A I don't recall the day.

22 Q Did you look at them before today?

23 A No, I did not.

24 Q Do you know what the original comment was
25 under which -- the original post rather under which

1 Exhibit 90 appeared?

2 A No, but we can provide the metadata and go
3 back and retrieve that.

4 Q Exhibit 91, is that a -- does that contain
5 a defamatory statement?

6 A Yes.

7 (Defendants' Exhibit Number 91 was marked
8 for identification.)

9 BY MR. MATZKIN:

10 Q Pretty short. Can you read it?

11 A "He hates the LGBTQ community."

12 Q Do you know why that comment was made?

13 MR. SHOCHET: Objection to form.

14 Competency. You can answer it.

15 A No.

16 Q Do you know the video -- uh, which link is
17 depicted underneath that comment?

18 A Yes.

19 Q What can you tell us about that video?

20 A John Cook stalked me, then trespassed on
21 that property. He called me gay, fag boy, all kinds of
22 things. I repeated what he said to him -- said to me,
23 and then he videoed and then he posted this.

24 Q Now, the video itself doesn't show him
25 saying the things you just claimed he said; am I right

1 the video doesn't show that?

2 A I don't recall, but I have plenty of video
3 with what he's called me and sent to me.

4 Q So you have video of him calling you such
5 names?

6 A Yes.

7 Q But you didn't produce those in response to
8 discovery? You can't look at your --

9 A I don't recall. My lawyer is the one that
10 produces discovery and not myself.

11 Q So your testimony is that there are videos
12 in your possession that would be of evidentiary value in
13 this case that haven't been produced yet, correct?

14 MR. SHOCHET: Objection to form. Lack of
15 foundation. Calls for speculation. You can answer.

16 A My expectation would be that you have those
17 videos of him pulling out a firearm out on me talking
18 about ramming stuff up my rear end, calling me gay, I'm
19 going to be in gay form, and the list goes on.

20 BY MR. MATZKIN:

21 Q Why would you expect me to have those in my
22 possession?

23 A Because I would assume that that is part of
24 this litigation. But if I am incorrect, I apologize.

25 Q Well --

1 A And I didn't assume. I expected.

2 Q Yeah. Who prepared this exhibit?

3 A Most likely Martha Rizk.

4 Q Do you remember what you said in the
5 video?

6 A Not completely.

7 Q Do you remember calling Mr. Cook a gay
8 fucking faggot?

9 A I remember repeating what Mr. Cook said to
10 me multiple times.

11 Q So you're --

12 A But I don't recall the exact verbiage.

13 Q But your testimony is that that would be --
14 strike that.

15 MR. MATZKIN: Exhibit 92.

16 (Defendants' Exhibit Number 92 was marked
17 for identification.)

18 BY MR. MATZKIN:

19 Q Do you claim Exhibit 92 contains a
20 defamatory statement about you?

21 A Yes.

22 Q What is it?

23 A He mooches off of his sheep. He's wasting
24 taxpayers' dollars.

25 Q Any others?

1 A No.

2 Q Who is Charles Green?

3 A I do not know.

4 MR. MATZKIN: Exhibit 93.

5 (Defendants' Exhibit Number 93 was marked
6 for identification.)

7 BY MR. MATZKIN:

8 Q Do you claim that Exhibit 93 contains a
9 defamatory statement about you?

10 A Yes.

11 Q What is it?

12 A He is a liar.

13 Q Where does it say this, the coward is a
14 liar, that?

15 A Uh-huh.

16 Q Okay. Do -- is this a reference -- is it
17 your understanding a lie about where garbage is coming
18 from?

19 A The reference to this is in regards to
20 diapers being found on a road in Otter Creek called Dead
21 Dog Road where diapers matching the diapers that Harley
22 Grace wear were found dumped.

23 Q I see.

24 A And John Cook went on to say, "Jeremy Hales
25 slides down in his chair like a scolded dog at the

1 board meeting after Gail, the board member, stands up
2 and says where all the garbage is coming from. And it
3 proves the coward is a liar. He could not put on one of
4 his rants because it would make him look like shit. His
5 stupid fucking fans will keep believe in it because most
6 of them are fat, old, ugly women with no life."

7 Q So is it your testimony that this is a
8 comment calling you a liar related to the diapers being
9 dumped?

10 A I can't put words into your client's mouth.

11 Q Okay.

12 A All I can tell you is he said the coward is
13 a liar and it's in reference to Jeremy Hales, which are
14 the first two words in the posting.

15 Q And can you connect this defamatory
16 statement to any specific lost income?

17 A Yes.

18 Q What specific lost income did you lose due
19 to this defamatory statement?

20 A In all of the totality and all of the
21 defamation, I've lost income on multiple of my
22 businesses.

23 Q And you're sure that this is because of
24 things that John Cook and Michelle Preston wrote as
25 opposed to any number of thousands of people who made

1 comments about What the Hales?

2 A I am 100 percent sure that it is in regard
3 to an anti What the Hales ecosystem, which John Cook and
4 Lynette Preston are part of.

5 MR. MATZKIN: Exhibit 94, please.

6 (Defendants' Exhibit Number 94 was marked
7 for identification.)

8 BY MR. MATZKIN:

9 Q Does this appear to be a Facebook comment
10 and replies to it? Strike that. It appears to be a
11 Facebook comment and reply. So who is David in David's
12 Post on top?

13 A I need time to read.

14 Q I'm just asking you who David is on the
15 top.

16 A And I need time to read the context to be
17 able to answer the question.

18 Q Okay.

19 A No. To my best knowledge, David would be
20 Middleton's best, which is a YouTube channel.

21 COURT REPORTER: Could you repeat that,
22 please?

23 THE WITNESS: To my best knowledge, David
24 is a reference to Middleton's Best, which is a YouTube
25 channel.

1 BY MR. MATZKIN:

2 Q And who prepared this exhibit? Martha
3 George Rizk?

4 A Most likely.

5 Q Do you have a way to provide the original
6 post and other comments under it?

7 A Absolutely. The metadata is never erased.
8 It's there forever no matter if they delete it, no
9 matter if Lynette deletes it, John deletes it, no matter
10 if David deletes it. It's always there. The metadata
11 is there for everybody to read.

12 Q My question is, after today are you able to
13 produce the same exhibit but in the context of the full
14 post in which it appeared?

15 A Yes. The metadata exists.

16 Q And what in 94 is defamatory about you?

17 A John Cook: We're gonna get David some more
18 viewers. Any other YouTuber who helps us clear up the
19 lies Jeremy is spreading about us and the town.
20 Defamatory stating I'm lying about him and the town.

21 I'm not finished with the question. I have
22 to continue to read. "Jeremy is on drugs," which is in
23 the last paragraph by your client John Cook.

24 Q Can you read the full sentence out loud?

25 A They're saying he's addicted to opiates and

1 mixes them with alcohol, which is what your client John
2 Cook stated as well, which is defamatory.

3 Q Okay. But actually, you didn't read the
4 full statement. It says: Well, one thing for sure, the
5 other YouTube are saying that Jeremy is on drugs.
6 They're saying he got addicted to opiates, correct? Did
7 I read that correctly?

8 A Yes, you did read it correct.

9 MR. MATZKIN: Exhibit 95.

10 (Defendants' Exhibit Number 95 was marked
11 for identification.)

12 BY MR. MATZKIN:

13 Q Comment under a Facebook post?

14 A That would be my guess, yes.

15 Q Do you claim Exhibit 95 contains a
16 defamatory statement about you?

17 A Yes.

18 Q What is it?

19 A "They turned him down after receiving
20 hundreds of videos of him going is homophobic. The
21 LGBTQ are very pissed off at him. And there's millions
22 of them waiting to go after Jeremy and his sheep and
23 trolls."

24 Q And who is "they" in "they turned him
25 down"?

1 A My best guess is that John is referencing
2 that producers came and wanted to pay me for my YouTube
3 videos.

4 Q That's a guess?

5 A That's my best recollection at this point
6 in time. That's what he's referring to, and then he's
7 saying that they turned him down after receiving videos
8 of him.

9 Q So is it the case that YouTube was going to
10 pay you for use?

11 A No. The case -- that TV producers were
12 going to pay me for my videos, and I turned them down
13 multiple times. I will not sell my videos.

14 Q Gotcha. So this would be inaccurate.
15 They, if it's referring to TV producers, turned you down
16 would be inaccurate. It's you turned them down?

17 A The truth is I've turned TV producers down.
18 I will not sell my videos.

19 Q So even if -- strike that.

20 MR. MATZKIN: 96, please.

21 (Defendants' Exhibit Number 96 was marked
22 for identification.)

23 BY MR. MATZKIN:

24 Q Why does it say "Create appointment" on
25 top?

1 A Your guess is as good as mine.

2 MR. MATZKIN: Can we get a time check?

3 THE COURT: You are at 11:42 and you
4 started at 10:34.

5 MR. MATZKIN: Okay. Exhibit 99.

6 (Defendants' Exhibit 99 was marked for
7 identification.)

8 BY MR. MATZKIN:

9 Q This is the affidavit of Melissa Lemmerman.
10 It was an exhibit attached to your opposition to motion
11 for summary judgment. My question is, why didn't
12 Ms. Lemmerman attach the screenshots to her affidavit
13 that she discusses in the affidavit?

14 MR. SHOCHET: Objection to form. Calls
15 for speculation. You can answer.

16 A I can't answer a question for somebody
17 else. I'm not done.

18 BY MR. MATZKIN:

19 Q Have you ever spoken to Melissa Lemmerman?

20 A No.

21 Q Do you know how it came to be that she
22 provided an affidavit?

23 A Yes.

24 Q How is that?

25 A She contacted my lawyer.

1 Q Is it your understanding that she contacted
2 your lawyer or somebody reached out to her?

3 A My understanding is she contacted my
4 lawyer.

5 Q Do you have the comments that Ms. Lemmerman
6 alleges in here as they appear?

7 A With all due respect, Exhibit 99 is not
8 even readable. Do you have something I can actually
9 read if you're going to ask questions about it?

10 Q Yeah.

11 MR. MATZKIN: Liz, can you give him the
12 original which would have -- just to look at.

13 COURT REPORTER: You gave me this one
14 (indicating), this 99.

15 MR. MATZKIN: 99. All right. Yeah. Oh,
16 that's the only one you have? With this?

17 COURT REPORTER: What you just gave me when
18 I got here.

19 MR. MATZKIN: Oh, that's right. It wasn't
20 an original.

21 COURT REPORTER: Yeah.

22 (Mr. Matzkin passing document to the
23 witness.)

24 MR. MATZKIN: Well, here.

25 THE WITNESS: That one looks just as bad.

1 MR. MATZKIN: This one (indicating), I
2 think, is better. That's better, right?

3 THE WITNESS: Yes, this one is a bit
4 better.

5 BY MR. MATZKIN:

6 Q So to repeat the question, do you have the
7 comments that Ms. Lemmerman particularly, you know,
8 references in this affidavit?

9 A I'm going to need time to actually read the
10 affidavit.

11 THE COURT: Mr. Matzkin, I guess my clock
12 here is about six minutes fast, so based on that, you're
13 actually at about 10:40; 10:39 or so.

14 MR. MATZKIN: And when did we start?

15 THE COURT: Well, I had written it off of
16 my clock here, which I think is -- it looks like a
17 couple minutes fast. So it may have been around -- I
18 had 10:34, but that was off.

19 MR. MATZKIN: That's like an hour and five
20 minutes so far.

21 THE COURT: Yeah.

22 MR. MATZKIN: Good. That's fine.

23 THE COURT: So I think you have about an
24 hour left. How are you doing content-wise?

25 MR. MATZKIN: I think we're in a good

1 place. Thank you.

2 THE COURT: Okay. Does anybody need a
3 break?

4 (No response.)

5 THE COURT: Okay. Then we keep rolling.

6 THE WITNESS: I do need time to actually
7 continue to read this without interruption, please.

8 MR. MATZKIN: Yeah, go ahead.

9 BY MR. MATZKIN:

10 Q The question is not based on the content of
11 the comment.

12 COURT REPORTER: I'm sorry. Could you
13 repeat that?

14 BY MR. MATZKIN:

15 Q I'm sorry. The question is not based on
16 the contents of the comments. My question is simply, do
17 you have anything other than the affidavit to reflect
18 these comments that she alleges?

19 A So if I understand your question correctly,
20 and I'm going to need some clarification, are you asking
21 page one, point four, I took notes and screenshots of
22 many of Ms. Preston's posts on her private Facebook
23 groups over many months until Ms. Preston removed me as
24 a member? Ms. Preston removed and deleted many of her
25 private groups. Is that in regards to your question?

1 Q My question is simply, other than this
2 affidavit, do you have any other evidence of these
3 comments that Ms. Lemmerman alleges?

4 MR. SHOCHET: Objection to form.
5 Competency. You can answer.

6 A I haven't had the conversations with this
7 woman. My attorney has. Therefore, I cannot answer
8 that question adequately.

9 BY MR. MATZKIN:

10 Q So your attorney has had direct -- your
11 understanding, has had direct communications with a
12 witness that's provided evidence, right? You just said
13 that.

14 A Yes.

15 Q And you're not able to answer my questions
16 about the evidence, right?

17 A (No response.)

18 Q The question that you just said you
19 couldn't answer --

20 A Hold up.

21 Q No, no, Mr. Hales. I just asked you a
22 question. You said you couldn't answer it because your
23 attorney spoke to Ms. Lemmerman; correct or incorrect?

24 A You stated that I can't answer questions
25 about evidence.

1 Q My question is, do you have any other
2 evidence of the comments that Ms. Lemmerman alleges in
3 her affidavit other than the affidavit, and you said you
4 don't, but your attorney spoke with Ms. Lemmerman
5 directly, not you, correct?

6 A My attorney would have evidence with this
7 witness.

8 Q Thank you.

9 MR. MATZKIN: Exhibit 100, please.

10 (Defendants' Exhibit Number 100 was marked
11 for identification.)

12 THE WITNESS: Counselor, do you need your
13 copy back, your original?

14 MR. MATZKIN: No, you can keep it.

15 THE WITNESS: Court reporter, do you need
16 an actual legible one?

17 MR. MATZKIN: As long as you have one to
18 work.

19 COURT REPORTER: I have one.

20 BY MR. MATZKIN:

21 Q Exhibit 100. If you look on -- and it's
22 several pages long. It's four pages long. And if you
23 can look on the fourth page. I apologize. I'm trying
24 to find my place. Forgive me.

25 Okay. The third page, paragraph 14,

1 please. It says: In April 2023, Mr. Cook posted online
2 a large collection of sex toys and stated that I was
3 selling my items. Mr. Cook also made threats about
4 posting pictures of his penis in my partner's mouth.

5 Did I read that accurately?

6 A Yes.

7 Q And the citation from your summary judgment
8 motion to this exhibit was just to your affidavit. And
9 so my question is, do you have any other evidence of the
10 posting referenced in Exhibit 14 other than your
11 affidavit?

12 A I don't understand your question.

13 Q Other than this statement in an affidavit,
14 do you have evidence to show that he posted online a
15 large collection of sex toys?

16 A Yes, I have screenshots.

17 Q You have screenshots. How come that wasn't
18 produced in response to my discovery requests?

19 MR. SHOCHET: Objection to form.
20 Competency. You can answer.

21 A If my recollection is correct, I believe
22 you actually showed it in my first deposition. But
23 maybe my recollection is wrong. It was definitely
24 referenced if not shown.

25 BY MR. MATZKIN:

1 Q It was not produced in response to the
2 written discovery request which came after that, but in
3 any event I'll move on.

4 And is there a reason why you didn't attach
5 the screenshot to your affidavit as an exhibit to the
6 affidavit?

7 MR. SHOCHET: Same objection; form.

8 A Yes, I'm not a lawyer. I'm a client.

9 BY MR. MATZKIN:

10 Q I'm going to ask you some questions about
11 Exhibit 77, which is the Complaint that was originally
12 filed in this case. Do you have that in front of you?

13 A Not yet. I do now.

14 (Defendants' Exhibit Number 77 was marked
15 for identification.)

16 BY MR. MATZKIN:

17 Q Okay. If you could turn to page five,
18 please. And if you can look at paragraph 25. And I'm
19 going to read paragraph 25 out loud and then ask some
20 questions about it. Preston and Cook immediately begin
21 publishing defamatory statements about Hales on their
22 various social media platforms.

23 In May 2023, for example, Preston stated on
24 her social media that she "watched Jeremy Hales' videos
25 till recently," and "Jeremy Hales only thinks about the

1 size of his junk." Did I read that accurately?

2 A Yes.

3 Q Where are the actual posts reflecting these
4 statements?

5 A So you're asking which social media page
6 she posted them on?

7 Q Sure. Which one?

8 A How much time do I have to go through the
9 exhibits?

10 Q They're not in the exhibits, Mr. Hales.
11 Mr. Hales, do you know without looking at the
12 exhibits -- strike that. Do you have the actual posts
13 somewhere? Do you have a screenshot although not
14 produced of the actual post?

15 A I'm sure I do.

16 Q Okay. How did you learn of those
17 statements?

18 A Saw them.

19 Q You saw them yourself?

20 A Yes.

21 Q Did anybody tell you to go look or you kind
22 of came across them on your own?

23 A I monitor it daily.

24 Q I'm sorry?

25 A I monitor it daily.

1 Q Monitor it is what, it?

2 A Meaning all of her social media posts.

3 Q So every day, even present time, every day
4 you do a monitoring of whatever Michelle Preston posts?

5 A Yes.

6 Q You go to several Facebook groups?

7 A Yes.

8 Q What are they?

9 A To my knowledge, she had 13. Now,
10 currently, what I monitor is Otter Creek friends and
11 family. It's a shelter and tortoise rescue and her --
12 the third one is I do her marriage page. And I also
13 monitor her YouTube and I monitor everybody associated
14 with her on YouTube to collect all defamatory
15 statements.

16 Q And you do this every day?

17 A Every day.

18 Q What time? Do you have a set time you do
19 this?

20 A No.

21 Q How long does it take you?

22 A I don't have a set time when I do it. It's
23 not a set time when it happens either. Some days there
24 may be defamation; some days there may not. For
25 example, last night there was a five hour plus

1 defamatory live stream which she participated in, which
2 I have every screenshot of everything she said, you
3 said, he said -- and can I please finish?

4 Q No, sir. It's not responsive and I'll move
5 on to my next question if I may.

6 THE COURT: He's answering the question.

7 A Good. Sometimes it can take five hours and
8 56 minutes as last night's did. For example, she made
9 many comments. You made comments, and John Cook made
10 comments.

11 BY MR. MATZKIN:

12 Q Mr. Hales, I only asked you whether you do
13 it every day and you've answered the question. I
14 appreciate that.

15 Now, what, um, is -- does immediately refer
16 to in the paragraph 25, "immediately begin"; relative to
17 what?

18 A Please rephrase your question.

19 Q In the first line of paragraph 25, it says:
20 Preston and Cook immediately begin publishing defamatory
21 statements. Immediately relevant to what?

22 A So in regards to the Complaint, when
23 Lynette and John did not get what they wanted from me,
24 which would have been money, gifts in kind, promotion
25 online, then the time frame when I said no, then

1 immediately starts the defamation.

2 Q I understand.

3 A It's a period of time.

4 Q Look at number 27 -- paragraph 27, if you
5 would, please. And I'm going to read it out loud.

6 "In May 2023, when Hales returned from Ohio
7 for a town meeting, Cook, one, pulled a gun on Hales as
8 Hales was driving by on the public roadway to enter
9 Hales' own property; two, trespassed in his truck onto
10 Hales' property with a gun. And when Hales confronted
11 him and requested him to leave, Cook told Hales that if
12 he moves one step further, he will see something 'go
13 bang'; and three, maliciously threatened to do injury to
14 Hales' reputation with intent thereby to extort a
15 pecuniary advantage, and accordingly, publicly stated
16 falsely on Facebook that Hales' fiancée had oral sex
17 with him, and that he has photographs to prove it."

18 Did I read that correctly?

19 A No. You did not read the footnote.

20 Q I'm not reading the footnote. Did I read
21 the paragraph 27 correctly?

22 A It is my belief that without reading the
23 footnote, the full paragraph --

24 Q Did I read paragraph 27 accurately?
25 (Crosstalk.)

1 THE COURT: If he has finished, answered,
2 then you can ask the question.

3 BY MR. MATZKIN:

4 Q Did I read paragraph 27 accurately,
5 Mr. Hales?

6 A No. You did not read the footnote, which
7 is a part of paragraph number 27.

8 Q Is number two in paragraph 27 a reference
9 to the same video that Exhibit 91 showed the link for,
10 which we referred to as the gay bashing video?

11 A Yes.

12 Q Is there a police report about that?

13 A I don't -- most likely, but I don't know
14 100 percent.

15 Q Is there a police report for the number one
16 incident, pulled a gun on Hales as Hales was driving by
17 a public roadway to enter Hales' own property?

18 A Yes.

19 Q Did you file a police report?

20 A Yes.

21 Q Is that something you can produce?

22 A Yes.

23 Q Is number three referenced in paragraph 27
24 a reference to Exhibit 88?

25 A Yes.

1 Q Where is the intent to extort pecuniary
2 advantage in these statements in paragraph 27?

3 MR. SHOCHET: Objection to form;
4 competency. You can answer.

5 A So footnote, paragraph 27, page six, Cook
6 posted: Jeremy, would you like me to post a picture of
7 my cock in George's mouth? You can't take this one
8 down.

9 BY MR. MATZKIN:

10 Q Okay. You got your footnote in there.

11 A Can I please finish answering the question?

12 Q No.

13 A Please don't interrupt.

14 MR. MATZKIN: I strike the question.

15 THE COURT: Hold on. Hold on. Let him
16 finish and then you can ask your next question. If you
17 don't like the answer that he gives you, you can ask the
18 question again or you can rephrase it.

19 MR. MATZKIN: I appreciate it. I got a
20 feeling he's filibustering with the time. That's all,
21 Your Honor.

22 BY MR. MATZKIN:

23 Q My question would be, where in 27 -- where
24 in the footnote is there a demand for pecuniary
25 advantage?

1 A Footnote number two under paragraph 27.

2 And if I read too fast, please slow me down. But I'm
3 trying to speed up based on his allegations. Jeremy,
4 would you like me to post a picture of my cock in
5 George's mouth? You can't take this one down.

6 In regards to the aspect of defamation,
7 extortion and the advantage, they wanted money. They
8 wanted gifts in kind. They wanted promotion on all of
9 my platform. They did not receive it.

10 Therefore, they then started this
11 harassment, defamation, things such as Cook -- excuse
12 me -- John Cook saying, Jeremy, would you like me to
13 post a copy of my cock in George's mouth. You can't
14 take this down. And many other things as we see in 28,
15 Jeremy Hales raped my daughter.

16 MR. MATZKIN: Your Honor --

17 A Jeremy Hales has to go. What the Hales.
18 Jeremy Hales, Ohio rapist.

19 MR. MATZKIN: Counsel, I ask you to control
20 your client.

21 A No Ohio rapists in Levy County. Please
22 stop -- stop Jeremy Hales. Jeremy Hales needs to go.
23 No child rapist in Levy County.

24 They did not get what they wanted;
25 therefore, they went to extort me and to damage me in

1 every way they possibly can. As your clients have even
2 stated publicly in writing, they want to take me down.
3 Your clients --

4 THE COURT: All right. You've answered the
5 question.

6 BY MR. MATZKIN:

7 Q Where in paragraph 27, including the
8 footnote, is there a statement demanding pecuniary
9 advantage? Within the written paragraph 27 and
10 footnote, where is there some statement demanding
11 pecuniary advantage?

12 A I believe it's in the totality of the
13 Complaint.

14 Q Okay. Paragraph 30, please.

15 MR. SHOCHET: Three? Thirty?

16 MR. MATZKIN: Thirty, 3-0.

17 MR. SHOCHET: 3-0.

18 BY MR. MATZKIN:

19 I'm going to read it out loud. On or about
20 May 28, 2023, Preston posted on her social media that,
21 one, quote, I'm going to stand tall and not let Jeremy
22 Hales hurt me ever again, unquote. Two, she will,
23 quote, put a cap on, quote, in the ass of anyone who
24 messes with her. And three, quote, I'm done with it.
25 You met your match, Mr. Hales, unquote.

1 Where are these posts?

2 A Online on Facebook.

3 Q Did you see them?

4 A Yes.

5 Q Why aren't they -- strike that. Where in
6 paragraph 30 is there a demand for pecuniary advantage?

7 A The demand is in the Complaint. That's the
8 totality of this whole thing.

9 Q Okay. Within paragraph 30, yes or no, can
10 you point me to words that constitute a demand for
11 pecuniary advantage?

12 A No, because the Complaint is the totality,
13 not just the paragraph.

14 Q Okay. So the answer is no. Back to 27,
15 are you able to point to words within paragraph 27 or
16 the footnote that constituted demand for pecuniary
17 advantage?

18 A And again, in the totality of what has
19 happened, the Complaint in itself, I don't believe it
20 wise to take one paragraph from another. It's the
21 totality of what they've done and what they have said
22 and the advantage that they have tried to seek --

23 Q So within the words --

24 A -- from myself.

25 Q -- of paragraph 27 and footnote two of --

1 footnote two, there -- the answer is no, there is no
2 words you can point to that constitute a demand for
3 pecuniary advantage?

4 A That is not what my response was. My
5 response was --

6 Q Within the paragraph, the words of the
7 paragraph, not referencing other context or totality of
8 anything, within paragraph 27 and footnote, two, are
9 there words you can now point to and read to us that you
10 claim constitutes a demand for pecuniary advantage?

11 A Can you please stop interrupting me when
12 I'm answering the questions?

13 MR. MATZKIN: He had to be.

14 THE COURT: Okay. I think you have the
15 answer to your question.

16 MR. MATZKIN: I appreciate it. I'll move
17 on.

18 BY MR. MATZKIN:

19 Q Thirty-one, please. Paragraph 31. You
20 write, despite knowing -- the Complaint says: Despite
21 knowing the falsity of their statements, Preston and
22 Cook used their defamatory statements to persuade Hales'
23 customers to stop supporting Hales.

24 Did I read that accurately?

25 A Yes.

1 Q The question is, apart from the statements
2 themselves, what did Preston and Cook do that you're
3 describing as, quote, using their defamatory statements
4 to persuade Hales' customers to stop supporting Hales?

5 A Please rephrase your question.

6 Q Yes. Other than the actual statement
7 itself that they make and you reference here, what are
8 they doing to use those statements to persuade people to
9 not support you?

10 A The statement of "Jeremy Hales raped my
11 daughter" is more than enough to persuade a customer not
12 to support me. Nothing else needs to be said or done.

13 Q Thank you. Paragraph 32 -- strike that.
14 Paragraph 59. So if we can flip ahead to page 11. In
15 paragraph 59, you reference -- you say: In two distinct
16 instances separated in time, Preston extorted Hales
17 within the meaning of Fla. Stat. 836.05.

18 And my question is, what are the two
19 instances?

20 A I would not be able to answer that without
21 referring to my attorney, because I don't know what the
22 Florida statute is, and he drafted this.

23 Q Let me rephrase. What two instances can
24 you point to where Preston demanded pecuniary advantage
25 from you on threat of something? Give me something or

1 else what two instances are there of that?

2 A Again, I don't feel comfortable answering
3 this question without my legal guidance and my counselor
4 based on Fla. Stat. 836.05. Uh --

5 Q Well, I'm not asking about the statute.
6 I'm just asking you generally -- forget about the
7 statute -- what two instances or any instances can you
8 point to a Ms. Preston saying, give me something of
9 value, money, pecuniary advantage, or else I'm going to
10 do something?

11 A I'd like to request time to read the
12 document because I believe this is actually referring to
13 the two instances already outlined in the document --

14 MR. MATZKIN: Can we do that on a break,
15 Your Honor?

16 THE COURT: Instead of being -- move past
17 this question and then we can come back to it again if
18 you have time.

19 MR. MATZKIN: Yeah. Okay. So we'll move
20 on from this and we'll come back to it. Thank you. And
21 the same would go for paragraph 65. It's the same
22 except for it refers to Mr. Cook, uh, two instances. So
23 we'll revisit those later just to give you a heads up.

24 BY MR. MATZKIN:

25 Q Moving on to paragraph 71, it says: Hales

1 maintains valid and enforceable contracts and business
2 relationships with his customers.

3 Did I read that accurately?

4 A Yes.

5 Q And then paragraph 72 says: Preston is
6 knowledgeable of the contractual and business
7 relationship between Hales and his customers. Accurate?

8 A Yes.

9 Q And then 73: Despite knowledge of the
10 customer's contractual and business relationship with
11 Hale, Preston intentionally and without valid
12 justification interferes with such relationship.
13 Accurate?

14 A Yes.

15 Q Why do you switch from relationships to
16 relationship?

17 A I don't know. I didn't draft the document.
18 My legal counsel did. So that could be a question for
19 my legal counsel.

20 Q In -- would it be accurate to say that you
21 have some individual relationships with customers
22 perhaps that you know personally? Would that be
23 accurate to say?

24 A Can you pinpoint where you're seeing the
25 discrepancy or maybe potentially typo within -- I mean,

1 we just saw "Hale" and my last name is "Hales."

2 Q I've moved on by then.

3 A So can you point to where you're seeing
4 relationship and relationships?

5 Q No. My question is, is it accurate that
6 you have individual relationships with individual
7 customers that you know personally?

8 A Yeah.

9 Q Okay. And is it also accurate to say that
10 just generally, you have a relationship with your
11 overall base of fans and customers and supporters?

12 A Yeah.

13 Q Okay. So both of those two things can be
14 accurate. You can have relationships with individuals,
15 Joe or Miss Smith that has purchased merchandise from
16 What the Hales, correct?

17 A Yes.

18 Q And you also can refer to and you do refer
19 to -- am I right -- as your relationship overall that
20 just all your customers and supporters?

21 A Sure, yeah.

22 THE COURT: And just so you know,
23 Mr. Matzkin, you're about 30 minutes.

24 MR. MATZKIN: Thanks.

25 MR. MATZKIN: I'm going to ask you some

1 questions now about your written discovery responses,
2 Exhibits 74, 75, and 76.

3 (Defendants' Exhibit Number 74 was marked
4 for identification.)

5 (Defendants' Exhibit Number 75 was marked
6 for identification.)

7 (Defendants' Exhibit Number 76 was marked
8 for identification.)

9 BY MR. MATZKIN:

10 Q Do you have those in front of you?

11 A Are we referring to page 14 and 15 of
12 Exhibit 77?

13 Q Right now I'm going to ask you about
14 Exhibit 74, which are your responses to request for
15 admission.

16 A Okay. So we're done with Exhibit 77,
17 correct?

18 Q Yes.

19 A Okay. One moment. I thought you were
20 referring to the paragraph. What exhibits did you want
21 me to pull up?

22 Q 74 for now.

23 A Okay. I do have 74.

24 Q Okay. Is that your responses to
25 admissions? What's the title?

1 A It reads: Responses to Defendants' First
2 Request for Production of Documents.

3 Q Oh, I'm sorry. Look at 75 then. I need to
4 find the admissions. It could be 75 or 76.

5 A Exhibit 75, I do have it in front of me.

6 Q Thank you. So in admission number one, you
7 indicate that you can't give names of other people who
8 saw the defamatory road signs, but that you can identify
9 them by other manner of identification; correct?

10 MR. SHOCHET: Objection to form. Lacks
11 foundation, but you can answer.

12 BY MR. MATZKIN:

13 Q Is that correct?

14 A As I read --

15 MR. SHOCHET: No objection.

16 A I read number one. It says, admitted --
17 "Admitted as to names. Denied otherwise."

18 Q Okay. And so when you say, "admitted as to
19 names," you're admitting that you can't name anybody who
20 saw the road signs other than three individuals -- two
21 Grangers and Zim Padgett, correct?

22 MR. SHOCHET: Same objection to form.

23 BY MR. MATZKIN:

24 Q Why are you looking at your lawyer?

25 A Because he objected and I need to know if I

1 can continue to answer or not.

2 MR. SHOCHET: You can answer.

3 THE WITNESS: Okay.

4 BY MR. MATZKIN:

5 Q So are you able to give any names of
6 anybody besides Stephen Granger, Therese Granger, or Zim
7 Padgett who saw the signs?

8 A Can you clarify your question? Are you in
9 regards to the signs posted in the ground around Otter
10 Creek or just saw the signs in general, because --

11 Q Yes, I will clarify. Can you give the
12 names of any individuals who saw the signs while they
13 were posted in the ground before they were found by
14 Stephen and Therese Granger, Zim Padgett?

15 A Stephen Granger, Therese Granger, Zim
16 Padgett. Other than that, I have not had anybody else
17 share with me.

18 Q Okay. Now, you do say, though, that you
19 deny otherwise, meaning you deny that you're unable to
20 identify people who saw the signs by another manner of
21 identification besides names.

22 MR. SHOCHET: Objection.

23 BY MR. MATZKIN:

24 Q So what other manner of identification are
25 you going to employ to show other people saw the signs?

1 MR. SHOCHET: Objection as to form.
2 Competency. You can answer.

3 A I don't understand the question.

4 BY MR. MATZKIN:

5 Q How are you going to prove that anybody saw
6 the signs while posted in the ground other than those
7 three people?

8 MR. SHOCHET: Objection as to form.
9 Competency. Also calls for attorney work product. You
10 can answer.

11 A I think number one, common sense. They're
12 major roads and there have been many studies done on
13 those major roads in regards to whether Otter Creek
14 needs a light or not. And those studies are all public
15 information. So the aspect that people were driving on
16 roads, common sense tells you it's a road. People drive
17 on it, and people saw it. And not only is it just a
18 road. It's very heavy traffic in the road. And so,
19 uh, traffic studies --

20 Q Traffic studies?

21 A Can I please finish?

22 Q I'm limited in time, Mr. Hales, and you
23 said traffic studies, and that answers my question. So
24 my next question is, can you name anybody by name, an
25 individual? You can certainly say cars drove by, but

1 can you identify any person other than Zim Padgett,
2 Therese Granger or Stephen Granger that saw the signs as
3 they were posted; yes or no?

4 A If anybody else comes forward, I will name
5 them.

6 Q Thank you. Admission number two, can you
7 read out loud the question and your answer?

8 A I don't have a question.

9 Q Oh, it's not listed, is it?

10 A Which is part of my confusion in your
11 questioning on this. I don't have it.

12 Q That's because your counsel didn't write
13 the admissions above the answer. What other publication
14 do you know of, if any, of the defamatory roadside signs
15 by my clients?

16 A Can you please restate the question?

17 Q Other than the signs being stuck in the
18 ground, are you aware of any other publication?

19 A Yes. I'm aware that Lynette Preston has
20 posted online on Facebook that she didn't post signs.
21 John did. I'm also aware that John Cook in his Ohio
22 court hearings, which he was found guilty for stalking,
23 stated that, what's it matter if Lynette posted the
24 signs? What's that have to do with me? I also know
25 that the signs are posted and pictures of the signs are

1 all over the internet.

2 Q Whoa, whoa, whoa. Did my clients put
3 pictures of the signs on the internet or did you put
4 pictures of the signs on the internet?

5 A That's -- uh, in regards -- are you asking
6 in regards to Lynette and John?

7 Q Do you have evidence that my clients posted
8 the signs on the internet; yes or no?

9 A I can't recall currently.

10 Q Thank you. Number two -- no, number three.
11 The question was, what did your reasonable inquiry -- my
12 question is, what did your reasonable inquiry and review
13 of readily obtainable or known information consist of?

14 MR. SHOCHET: Objection as to form. Lacks
15 foundation. You can answer.

16 A Can you restate the question, please?

17 BY MR. MATZKIN:

18 Q I need to move on from that question. You
19 admit that Zim Padgett, Stephen Granger and Therese
20 Granger don't believe the statements on the signs,
21 correct? You admitted that in number four.

22 A Correct.

23 Q Nevertheless, you weren't, uh, willing to
24 admit that the Grangers and Zim Padgett know the signs
25 were false, whereas you admitted that Deanna West does

1 know the signs were false.

2 MR. SHOCHET: Objection.

3 BY MR. MATZKIN:

4 Q So what's the difference between Deanna
5 West who knows the signs were false and the other three
6 individuals that you weren't willing to admit know that
7 they're false?

8 A I -- again, I don't understand your
9 question. If you can ask a clear, concise question,
10 then I would be able to answer it.

11 Q That's okay. I'll move on. Um, okay. All
12 right. Now, you identified three contracts as being
13 interfered with. Olight Facebook and Whatnot; correct?

14 A Are you referring to Exhibit 75 again?

15 Q I'm asking you right now sitting here, not
16 referring to an exhibit, are you -- is it your testimony
17 that my clients interfered with Olight Facebook and
18 Whatnot contracts?

19 A Yes.

20 Q Okay. Do you have an actual contract with
21 Facebook?

22 A Yes.

23 Q A written contract?

24 A So terms of service for monetization is a
25 contract. I've attempted to try and retrieve that, but

1 most of those are public information. So you -- when
2 you sign -- there's not where I can --

3 Q Terms of services?

4 A So I can't just go in and print off of
5 Facebook.

6 Q I gotcha. But you --

7 A Terms of service for monetization; correct.

8 Q You've agreed to terms of service, but you
9 didn't have a actual transaction with lawyers to sign a
10 special contract. Anybody could do what you did,
11 right?

12 A They do it.

13 Q And, uh, but you do have an actual contract
14 with Whatnot?

15 A Yes, I do.

16 Q All right. And you claim that my clients
17 interfered with that contract?

18 A As recently as a week ago, your clients --

19 Q What did they do a week ago?

20 A As recently as a week ago, your clients and
21 those supporting their efforts to destroy my life and my
22 business and my relationships have gotten all of my
23 links to my Whatnot options taken off of YouTube. And
24 that is my primary promotion for my Whatnot options.

25 Q My clients got your Whatnot links taken off

1 of YouTube?

2 A Yes.

3 Q My clients contacted Whatnot and said, take
4 Jeremy Hales' links off of YouTube?

5 A Your clients -- your clients and your anti
6 What the Hales media ecosystem have --

7 Q Do you have --

8 A Could I please --

9 Q -- John Cook --

10 A -- answer --

11 THE COURT: Hold on. Listen. You can let
12 him -- if you're going to ask very open-ended questions,
13 you're going to get long answers.

14 BY MR. MATZKIN:

15 Q The question: Do you have evidence that
16 John Cook contacted Whatnot directly?

17 THE COURT: He is providing you with
18 whatever his answer is as to what that evidence is.

19 MR. SHOCHET: May he be allowed to finish
20 the initial answer?

21 THE COURT: Go ahead.

22 A Your clients and the anti What the Hales
23 eco media system have very openly stated to report
24 everything, take him down. Get him removed. And report
25 his Whatnot. Report his options. Report on Whatnot.

1 Report YouTube. Report Facebook. Report everything to
2 the point where YouTube did remove all of my links to my
3 options based on the reports of the anti What the Hales
4 media ecosystem, which is my main marketing towards my
5 options which is supplementing my current loss of income
6 on YouTube and Facebook, which now I'm going to lose
7 income on Whatnot as well due to it.

8 BY MR. MATZKIN:

9 Q Okay. So question: Do you have evidence
10 that John Cook made direct contact with Whatnot of any
11 kind at any time?

12 A I will contact Whatnot and find out who
13 contacted them.

14 Q Do you have any evidence that Michelle
15 Preston -- Lynette Preston contacted Whatnot directly at
16 any time?

17 A I have evidence of your client saying,
18 report everything that I do, which we actually looked at
19 in your exhibits earlier here this morning.

20 Q Do you have evidence that Lynette Michelle
21 Preston directly contacted Whatnot?

22 A I will contact Whatnot and find out if she
23 did. But that's not the issue we're talking about.
24 We're talking about the issue with YouTube.

25 Q No question. No question.

1 THE COURT: You answered the question.

2 THE WITNESS: Yes, sir.

3 THE COURT: And Mr. Matzkin, you're about
4 15 minutes.

5 MR. MATZKIN: Thank you.

6 BY MR. MATZKIN:

7 Q Let's see. So you're not claiming any
8 other contracts were interfered with besides Whatnot,
9 terms of service of Facebook, and, uh, Olight?

10 A There was no contract with Olight. I'm
11 claiming that income has been drastically affected. So
12 while I have no contract with Olight, income is affected
13 based on that. While I am still in contract with
14 YouTube, income with YouTube has been drastically
15 affected based on these things.

16 Q And you have an outside contract with
17 YouTube, not just terms of service?

18 A Terms of service.

19 Q Understood. If you had any direct
20 communications from Mr. Cook or Ms. Preston threatening
21 you unless you give them something, you will have
22 produced it, correct?

23 MR. SHOCHET: Objection, form. Competency.
24 You can answer.

25 BY MR. MATZKIN:

1 Q Do you understand my question?

2 A Can you restate the question, please,
3 rephrase it?

4 Q Can I expect that you have produced any
5 direct communications from either Mr. Cook or
6 Ms. Preston to you threatening you unless you give them
7 something?

8 MR. SHOCHET: Same objection. You can
9 answer.

10 A (No response.)

11 BY MR. MATZKIN:

12 Q Are there any others out there that we're
13 not aware of yet because you didn't produce them?

14 A There's nothing else out there that I'm
15 aware of currently, but there is more coming daily.

16 Q Meaning you're going to continue your daily
17 canvassing?

18 A Last night was over five hours' worth.

19 MR. MATZKIN: Look at Exhibit 101, please.

20 (Defendants' Exhibit Number 101 was marked
21 for identification.)

22 BY MR. MATZKIN:

23 Q And if you look at paragraph 15 -- I'm
24 sorry. It's not Exhibit 101. It's your affidavit dated
25 March 26, 2023. We were asking questions about it

1 earlier. Is it 101?

2 A 71, I think.

3 Q Or 100, maybe.

4 MR. SHOCHET: 100?

5 MR. MATZKIN: 100.

6 BY MR. MATZKIN:

7 Q And if you look at paragraph 15, it talks
8 about a cease and desist letter.

9 A Correct. Page three --

10 Q Yeah.

11 A -- Exhibit 101? Or excuse me, 100 with a
12 scratch in the last zero?

13 Q Yeah.

14 A Yes.

15 Q And does it -- does it reference a cease
16 and desist letter in paragraph 15?

17 A Yes.

18 Q Does that cease and desist letter quote any
19 specific defamatory statement? You might not have it,
20 but I'm going to show you Exhibit 10. If you could look
21 at Exhibit 10, which is the cease and desist letter. Is
22 there any specific quoted defamatory statement within
23 Exhibit 10?

24 A Counsel, I need time to actually read it.
25 (Defendants Exhibit Number 10 was marked

1 for identification.)

2 BY MR. MATZKIN:

3 Q Uh-huh.

4 A It's referenced in paragraph number five:
5 It's come to our attention that you posted defamatory
6 statements regarding Jeremy Hales --

7 COURT REPORTER: Slow down, please.

8 THE WITNESS: I apologize. I'm sorry.

9 BY MR. MATZKIN:

10 Q Okay. I see. I see what you're referring
11 to. It has come to our attention that you posted
12 defamatory statements regarding Jeremy Hales on various
13 web pages including but not limited to -- etcetera,
14 etcetera, as well as other social media platforms.

15 So my question is, is there a quoted
16 defamatory statement within that paragraph?

17 A No, there is not.

18 Q Okay. Now, this cease and desist demands
19 removal of all postings; am I correct? All postings, it
20 says.

21 A Can you refer me to the paragraph you're --

22 Q Yes.

23 A -- referring to?

24 Q B -- in the third from the bottom
25 paragraph, it begins with: We demand that you

1 immediately A, B -- and B is the part I'm asking about.
2 Immediately remove and delete all postings related
3 Mr. Hales and his interests. Do you see that?

4 A Yes, that's what it says.

5 Q Okay. Now, that doesn't qualify the demand
6 as referring to just defamatory postings, does it?

7 A It does if every one of her postings about
8 me is defamatory. If every one of his postings about me
9 are defamatory, I can assure you they didn't say
10 anything pleasant.

11 Q So in other words, your testimony is that
12 the demand to remove all postings is because all
13 postings are defamatory, not because they were just
14 being -- the cease and desist was being indiscriminate;
15 is that correct?

16 A Yes, sir. Can you rephrase it --

17 Q Yes.

18 A -- to a natural question?

19 Q So your testimony is the reason that this
20 cease and desist demands that they remove all postings
21 is because it's your testimony all postings being made
22 about you are defamatory?

23 A No, my testimony was --

24 MR. SHOCHET: Object to form. Competency.
25 You can answer.

1 A My testimony was if all of their postings
2 are defamatory, then it catches every single one of
3 their postings, which are defamatory, which they have
4 nothing nice to say. Now, in regards --

5 BY MR. MATZKIN:

6 Q Do you --

7 A Can I please answer the question? In
8 regards to your question about why it's posted that way,
9 my lawyer who drafted this drafted it that way. I can't
10 answer why he did that because I'm not him.

11 Q Okay. Is it your testimony that you know
12 that Mr. Cook and Ms. Preston never made any post about
13 you that is non-defamatory?

14 A No, that is not my testimony. My testimony
15 was if --

16 Q It was a yes or no question.

17 MR. MATZKIN: Your Honor, if I ask a yes or
18 no, I should get a no answer.

19 THE COURT: Let him answer the question.
20 Then you can come back and ask him for a yes or no.

21 BY MR. MATZKIN:

22 Q So -- I'll move on to the next question.
23 Has there to your knowledge been ever any follow-up to
24 this letter from Stanley Griffis or anybody at his firm
25 to my clients?

1 A Yes.

2 Q And what was that follow-up?

3 A Lynette Preston called Stanley Griffis and
4 Stanley Griffis communicated or listened to, in his
5 words, Lynette Preston for over half an hour yell and
6 scream at him over the phone.

7 Q And was there any follow-up after that?

8 A You're asking in regards to Stan?

9 Q I'm asking -- you're right -- whether your
10 retained counsel, Stanley Griffis did anything other
11 than send a cease and desist?

12 THE COURT: You're about five minutes.

13 A No. The follow-up was when I was in Ohio.
14 I finally hit a breaking point with what they were doing
15 and saying, and I filed for civil protection orders
16 against them.

17 BY MR. MATZKIN:

18 Q In paragraph 16, you mentioned that the
19 signs were posted all over Otter Creek, but in the
20 Complaint, you wrote they were posted around the roads
21 surrounding Hales' property in Levy County, Florida.

22 So my question is, is the second
23 description more accurate that the signs were posted
24 around your property?

25 A Are we referring to another exhibit? Where

1 are we?

2 Q Paragraph 16.

3 A Exhibit 100.

4 Q Same exhibit.

5 A Okay. Okay. I'm there.

6 Q Yeah. So in that paragraph you say that
7 the signs were posted, quote, all over Otter Creek. But
8 in the Complaint, you describe it as around the roads
9 surrounding Hales' property in Levy County. So would
10 the second description be more detailed?

11 You're not saying that the signs were
12 posted far away from your property but only near your
13 property, right?

14 A The signs were posted all over Otter Creek.
15 Otter Creek is a town of less than a hundred people with
16 two major highways.

17 Q Yeah, but you said around your property.

18 THE COURT: You asked him where else they
19 were posted. He is answering it. Go ahead and finish
20 where else they were posted.

21 A Otter Creek has two major highways. That
22 would be Route 19, which is also called Route 98 and
23 Route 24. While I own property on Route 24 and right
24 off of Route 19 and 98, they were posted on Route 24.
25 They were posted on Route 19, 98. They were posted

1 downtown Otter Creek on different -- on different roads.

2 So they were all over Otter Creek and near
3 my properties --

4 BY MR. MATZKIN:

5 Q Okay.

6 A -- which Otter Creek is small. So the
7 aspect of the detailing and describing Otter Creek
8 around Otter Creek or around the properties, I have more
9 property than anybody in Otter Creek. Otter Creek is
10 very, very small. Both descriptives are very true.

11 Q Yes or no, do you have any photographs of
12 the signs as they were found in the ground?

13 A Yes.

14 Q How many?

15 A One.

16 Q Okay. Um, in paragraph 19 -- in 19, you
17 write: Mr. Cook's and Ms. Preston's online post calling
18 me a child predator are constant and ongoing to this
19 day. Correct?

20 A Correct.

21 Q What online post calling you a child
22 predator are you referring to most recently to this
23 day?

24 A Well, there was an entire live stream last
25 night calling me a pedifile for over five hours that you

1 were a part of and so were your clients.

2 Q I'm going to put --

3 A So to this day which went past midnight
4 into this day, which is posted online on YouTube
5 currently right now this day.

6 Q Are you referring to any Facebook posts?

7 A You asked me online posts. So Facebook,
8 YouTube, all of the social media platforms are online
9 postings.

10 Q Okay. And you --

11 A YouTube was last night and this morning to
12 this very day.

13 Q You identified last night's YouTube stream.
14 Are there more -- most recently before that, what would
15 be an online post calling you a child predator?

16 A I would have to go back and look. There's
17 so much information for me to go through.

18 Q And then --

19 A If you would have prepped me for this
20 question, I could have been better prepared.

21 Q And then you state: Their behavior is
22 escalating and they're harassing me in Ohio and in
23 Florida. Did I read that correctly?

24 A Which number are you on, please?

25 Q It's nineteen or 20 maybe.

1 THE COURT: You have two minutes.

2 A Can I have the exact number?

3 BY MR. MATZKIN:

4 Q No. I'm going to move on to the next
5 question.

6 MR. MATZKIN: May I have five extra
7 minutes? I'm just --

8 A I just found it on 19.

9 MR. MATZKIN: Your Honor?

10 THE COURT: You have until -- we're right
11 at 12:30. You can go until 12:35 and that's it.

12 MR. MATZKIN: I appreciate it.

13 BY MR. MATZKIN:

14 Q It starts with "their behavior is
15 escalating."

16 A I found it in 19.

17 Q Yeah. So they are harassing me in Ohio and
18 in Florida. Is there something other or more recent in
19 Ohio than that email, Exhibit 78, to the mayor's
20 assistant?

21 A Well, the aspect of online harassment has
22 no boundaries in regards to states and countries. So
23 what specifically -- can you rephrase the question?

24 Q No, I'm moving on to the next question.

25 MR. MATZKIN: Exhibit 101 -- well, Exhibit

1 102, please.

2 (Defendants' Exhibit 102 was marked for
3 identification.)

4 BY MR. MATZKIN:

5 Q Exhibit 102, could you read the -- out
6 loud -- the text beginning with "our haters" and
7 skipping the time stamp.

8 A "Our haters can't stop talking about us
9 even when they have legal documents in their hands."
10 Even when they.

11 Q Continue.

12 A Know they're going to be sued even though
13 they know they're going to lose everything in a lawsuit
14 because a lawsuit isn't -- isn't to win a lawsuit. It's
15 to make you spend all your money on a lawyer and
16 bankrupt you. That's what -- that's what the win is. I
17 could care less if I win in court. If I win in court
18 situation, my goal is to make sure you have no money.
19 That is the goal of the lawsuit and what they do.
20 They -- what do they keep doing talking about us?

21 Q Okay. Now, I created this exhibit from
22 May 21st, 2023, what the Hales live stream of which the
23 link appears. Do you doubt the accuracy of my cutting
24 and pasting of what you said on that date?

25 A I do doubt it because I speak in complete

1 sentences.

2 Q Okay.

3 A But I do think that the -- you used AI
4 transcribing which is often wrong.

5 Q Okay.

6 A But the context is there.

7 Q And Exhibit 101, could you read that out
8 loud?

9 A "December 8, 2024. Live stream on "That
10 Umbrella Guy." Do you want me to read the link?

11 Q Yes -- no, no. I don't want you to read
12 the link; just the text.

13 A Guess what the magistrate. Now you know
14 what I'm not going to share that yet. I apologize. I
15 went down a road that wasn't fair. Well, I will share
16 this magistrate is well aware and the magistrate has
17 told us to file a motion against him for sanctions.
18 From the own -- from the own -- from the magistrate's
19 own mouth, file a motion against sanctions. He will
20 bring him here to Pensacola and he will rule on it.

21 So all these things that he has done to the
22 magistrate isn't pulling any punches. He will -- I
23 can't read that. And crook will have to be in
24 Pensacola.

25 Q Okay. I can tell you that some people

1 inquired as to whether you had had direct communications
2 with the magistrate based on this, but that's not what
3 you were trying to convey, was it? Of course not.

4 A No. The magistrate -- my counsel emailed
5 the magistrate and my counsel shared with me that the
6 magistrate emailed him back. And he shared with me what
7 the magistrate emailed him back and I shared that
8 publicly that we were to file a motion and if need be,
9 everybody would be brought to Pensacola. And looky
10 here, here we are.

11 Q Okay. But you did put "own mouth." That's
12 the word you used.

13 A Put what?

14 Q Mouth, from the magistrate's own mouth.

15 A An email would be communication from the
16 magistrate's own mouth.

17 Q No, you're --

18 A Now, I can't confirm that this is one
19 hundred percent true because I don't remember. I do so
20 many videos and live streams. But I will say that AI
21 transcribing is not reliable, but I will also say
22 that --

23 Q I don't push --
24 (Crosstalk.)

25 A -- the context of this I've shared, that

1 the magistrate told us through email, file a motion. My
2 counsel shared with me, we're going to file a motion and
3 we need -- everybody is coming here to Pensacola and
4 here we are.

5 BY MR. MATZKIN:

6 Q Mr. Hales, people who follow your channel
7 and content, they can form opinions about you, correct?
8 Yes or --

9 A Yes.

10 Q -- no? And they're free to voice those
11 opinions either orally or in written form. Yes or no,
12 correct?

13 A They are free under the extent of the law.
14 So you may have freedom of speech, but there are
15 consequences when you break the law with that snitch.

16 Q And they're free to voice their opinions.

17 THE COURT: You have two minutes,
18 Mr. Matzkin.

19 MR. MATZKIN: Excuse me?

20 THE COURT: You have two minutes.

21 BY MR. MATZKIN:

22 Q And they're free to voice their opinions
23 within the confines of the law whether they're favorable
24 or unfavorable about you, correct?

25 A As long as it doesn't break the law.

1 Q And they're allowed to articulate then
2 whether they're positive or negative about you, correct?

3 A As long as it doesn't break the law.

4 Q And whether they're comments from a fan or
5 from a hater, correct?

6 A As long as it doesn't break the law.

7 Q Have there, um, ever been other people who
8 have made defamatory statements about you in YouTube
9 chats or Facebook pages?

10 A Yes.

11 Q Have you sued them?

12 A I'm in the process right now. We just
13 amended to bring more, you being one of them.

14 Q Have you ever come into possession of other
15 private messages that the sender thought was
16 confidential but then you got to see them about you?

17 A Please rephrase your question.

18 Q Uh --

19 A I'm stuck on the --

20 Q That's all --

21 A -- confidential part of it because
22 confidential, you send anybody to -- anything, it's the
23 end of it. It doesn't matter. It's never going to be
24 confidential.

25 Q You're a public figure, correct?

1 A Yes.

2 Q And so public figures are -- what -- it
3 comes with the territory to have people who they don't
4 know say things about them, correct?

5 MR. SHOCHET: Objection to form.
6 Competency. You can answer.

7 A Again, anybody can have an opinion about
8 me. They can go, Jeremy is good looking. They could
9 say he's the ugliest thing I've ever seen. I love him.
10 I hate him. That's all fine in the extent of the law.
11 And as you said about your own client, Lynette Preston,
12 she's a celebrity now. Once you're a public figure,
13 it's going to happen. I don't care about any of that.
14 I care about when it's defamation and destruction of my
15 business, my personal relationships, my life. That's
16 the illegal part.

17 THE COURT: Last question.

18 BY MR. MATZKIN:

19 Q You just, um, called Ms. Preston a
20 celebrity.

21 A No, you called her Ms. Preston a celebrity
22 in written writing form, which I have that.

23 Q Have you ever used the name Toni Restano
24 (phonetic)?

25 THE COURT: That was your last question.

1 You're out of -- time has expired.

2 MR. SHOCHET: I have no questions. We'll
3 read.

4 THE COURT: Okay. So wrap it up the way
5 you normally would with the deposition with the court
6 reporter.

7 MR. MATZKIN: Yes. May I do a -- may I do
8 a short summation? I don't want to presume.

9 THE COURT: Whatever you would normally do
10 if you were in a deposition.

11 MR. MATZKIN: Yeah. Okay. So we're done
12 with questioning today, and I believe you haven't
13 identified any false statements that you showed can
14 cause damage or any single statements containing an
15 extortionist threat or identified any single customers
16 lost due to interference with my clients. I have no
17 more questions. Okay.

18 MR. SHOCHET: We'll read. No questions.

19 THE COURT: Did you say you're requesting
20 read?

21 MR. SHOCHET: Sorry?

22 THE COURT: Did you say you're requesting
23 read?

24 MR. SHOCHET: Requesting read; 30 days?
25 Counsel?

1 MR. MATZKIN: Sir?

2 MR. SHOCHET: Thirty days?

3 MR. MATZKIN: Oh, sure.

4 THE COURT: Anything further that we need
5 for the court reporter?

6 COURT REPORTER: Yes, sir. I need any
7 orders. Are you ordering the transcript?

8 MR. MATZKIN: Yes, sir.

9 MR. SHOCHET: We'll take a copy.

10 COURT REPORTER: Any special format?

11 MR. MATZKIN: Just the regular with the
12 mini and the glossary, the word glossary.

13 MR. SHOCHET: Digit only.

14 MR. MATZKIN: Me too. Digital. I do not
15 need a hard copy.

16 COURT REPORTER: Okay.

17 MR. MATZKIN: Only by email.

18 COURT REPORTER: And the exhibits attached
19 digitally?

20 MR. MATZKIN: If that's the process, yeah.

21 COURT REPORTER: Okay. And reading and
22 signing through you, sir, Mr. Shochet?

23 MR. SHOCHET: Sorry?

24 COURT REPORTER: Reading and signing
25 through you --

1 MR. SHOCHET: Yes.

2 COURT REPORTER: -- sent to your office?

3 MR. SHOCHET: Yes. Yes.

4 COURT REPORTER: Okay.

5 MR. SHOCHET: Are you the same court
6 reporter that did the other deposition; the same
7 company?

8 COURT REPORTER: No. No. Same company,
9 yes.

10 MR. SHOCHET: Okay. Whatever you guys did
11 that way, just go ahead and do that. That's fine.

12 COURT REPORTER: Okay.

13 THE COURT: Anything further for the court
14 reporter? Do you need anything else?

15 COURT REPORTER: If I need any spellings,
16 can I contact the attorneys?

17 MR. MATZKIN: Sure.

18 COURT REPORTER: Thank you.

19 MR. SHOCHET: Sorry?

20 COURT REPORTER: If I need any spellings,
21 can I contact the attorneys?

22 MR. SHOCHET: Absolutely. Absolutely.

23 COURT REPORTER: Thank you.

24 THE COURT: All right. So the court
25 reporter, we are done with that part of that. You're

1 free to go.

2 (The deposition concluded at 12:39 p.m.)

3 Signature was not waived.

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CERTIFICATE OF OATH - VOLUME II

STATE OF FLORIDA)

COUNTY OF ESCAMBIA)

I, Liz Reyes, FPR-C, Notary Public, State of
Florida at Large, certify that Jeremy B. Hales
personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 19th
day of December, 2024.



LIZ REYES, FPR-C
NOTARY PUBLIC AT LARGE
STATE OF FLORIDA



CERTIFICATE OF REPORTER - VOLUME II

STATE OF FLORIDA)
COUNTY OF SANTA ROSA)

I, Liz Reyes, FPR-C, certify that I was
authorized to and did stenographically report the
foregoing deposition of Jeremy B. Hales, that a review
of the transcript was requested, and that the transcript
is a true record of the testimony given by the witness.

I further certify that I am not a relative,
employee, attorney, or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorneys or counsel connected with the action, nor am I
financially interested in the action.

Dated this 10th day of January, 2025.



LIZ REYES, FPR-C
NOTARY PUBLIC AT LARGE
STATE OF FLORIDA



1 SIGNATURE PAGE/ERRATA SHEET - VOLUME II

2 CASE STYLE: JEREMY B. HALES v. LYNETTE MICHELLE LACEY
ALEXIS PRESTON and JOHN COOK

3 CIVIL ACTION NO.: 1:24-CV-00045-AW-ZCB

4 I, JEREMY B. HALES, do hereby certify that I
5 have read the preceding pages and that they are correct,
6 to the best of my knowledge, with the following
exceptions:

7	PAGE NO.	LINE NO.	CHANGE	REASON
8				
9				
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17				
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19				

20 Under penalties of perjury, I declare that I have read
21 the foregoing document and that the facts stated in it
22 are true.

23
24 JEREMY B. HALES DATE

25

Exhibits	
Exhibit 1	292:10
Exhibit 3	292:11
Exhibit 4	292:11
Exhibit 5	292:12
Exhibit 6	292:12
Exhibit 7	292:13
Exhibit 8	292:13
Exhibit 9	292:14
Exhibit 10	292:14 387:20,21,23,25
Exhibit 11	292:15
Exhibit 22	292:15
Exhibit 25	292:16
Exhibit 27	292:16
Exhibit 28	292:17
Exhibit 29	292:17
Exhibit 30	292:18
Exhibit 31	292:18
Exhibit 32	292:19
Exhibit 33	292:19
Exhibit 34	292:20
Exhibit 35	292:20
Exhibit 36	292:21
Exhibit 37	292:21
Exhibit 38	292:22
Exhibit 39	292:22
Exhibit 41	292:23
Exhibit 42	292:23
Exhibit 43	292:24
Exhibit 44	292:24
Exhibit 45	292:25
Exhibit 46	293:3
Exhibit 48	293:3
Exhibit 49	293:4
Exhibit 51	293:5
Exhibit 52	293:5
Exhibit 53	293:6
Exhibit 54	293:6
Exhibit 55	293:7
Exhibit 56	293:7
Exhibit 57	293:8
Exhibit 58	293:8
Exhibit 59	293:9
Exhibit 60	293:9
Exhibit 61	293:10
Exhibit 65	293:12
Exhibit 66	293:12
Exhibit 67	293:13
Exhibit 68	293:13
Exhibit 69	293:14
Exhibit 70	293:14
Exhibit 71	293:15
Exhibit 74	293:16 375:3,14
Exhibit 75	293:17 375:5 376:5 381:14
Exhibit 76	293:17 375:7
Exhibit 77	293:18 360:11,14 375:12,16
Exhibit 78	293:18 299:11,14 301:12 302:7,16 395:19
Exhibit 79	293:19 303:10,12,16,19 304:1 305:2,8,9
Exhibit 80	293:20 306:3,4,7,18 308:14 309:16
Exhibit 81	293:20 310:13,14,16 311:23 312:1,8
Exhibit 82	293:21 312:20,21 314:25 315:11,13,16
Exhibit 83	293:21 315:24
Exhibit 84	293:22 315:24,25 316:3
Exhibit 85	293:22 321:8,9
Exhibit 86	293:23 324:7,8,11
Exhibit 87	293:23 325:24 326:1,4
Exhibit 88	293:24 329:2,4 331:4,5,10 365:24
Exhibit 89	293:24 333:16,18 335:10
Exhibit 90	293:25 333:15 341:25 342:1,4 344:1
Exhibit 91	294:3 344:4,7 365:9
Exhibit 92	294:3 346:15,16,19
Exhibit 93	294:4 347:4,5,8
Exhibit 94	294:4 349:5,6
Exhibit 95	294:5 351:9,10,15
Exhibit 96	294:5 352:21
Exhibit 97	294:6
Exhibit 99	294:7 353:5,6 354:7
Exhibit 100	294:7 358:9,10,21 392:3
Exhibit 101	294:8 386:19,20,24 387:11 395:25 397:7
Exhibit 102	294:8 395:25 396:1,2,5
1	
10	387:20,21,23,25
100	349:2 358:9,10,21 365:14 387:3,4,5,11 392:3
101	386:19,20,24 387:1,11 395:25 397:7
102	396:1,2,5
10:16	313:3
10:34	353:4 355:18
10:39	355:13
10:40	355:13
11	371:14
11:42	353:3
12:30	395:11
12:35	395:11
12:39	405:2
13	313:4 362:9
14	358:25 359:10 375:11
15	375:11 385:4 386:23 387:7,16
16	391:18 392:2
19	392:22,24,25 393:16 395:8,16
1:24-CV-45	295:4
2	
20	394:25
2023	359:1 360:23 364:6 368:20 386:25 396:22
2024	397:9
21st	396:22
24	392:23,24
25	360:18,19 363:16,19
26	386:25
27	364:4,21,24 365:4,7, 8,23 366:2,5,23 367:1 368:7,9 369:14,15,25 370:8
28	297:15 367:14 368:20

3	82 312:20,21 314:25 315:11,13,16	accurately 359:5 361:1 364:24 365:4 370:24 373:3	alleges 354:6 356:18 357:3 358:2
3-0 368:16,17	83 315:24	aches 314:19	allowed 383:19 400:1
30 368:14 369:6,9 374:23 402:24	836.05 371:17 372:4	Active 321:18 322:3	allowing 312:17
31 370:19	84 315:24,25 316:3	actual 308:3 315:12 332:2 341:13 358:16 361:3,12,14 371:6 381:20 382:9,13	alluding 306:20
32 371:13	85 321:8,9	addicted 350:25 351:6	altered 332:2,8
5	86 324:7,8,11	address 312:13,16	amended 400:13
56 363:8	87 325:24 326:1,4	adequately 357:8	amount 307:15
59 371:14,15	88 329:2,4 331:4,5,10 365:24	admission 375:15 376:6 379:6	analytics 340:5
6	89 333:16,18 335:10	admissions 375:25 376:4 379:13	Angela 331:1,2 333:17,21 334:12,17 335:2
65 372:21	9	admit 380:19,24 381:6	answering 296:9 363:6 366:11 370:12 372:2 392:19
7	90 333:15 341:25 342:1,4 344:1	admitted 376:16,17, 18 380:21,25	answers 317:4 378:23 383:13
7/13/23 327:13	91 344:4,7 365:9	admitting 376:19	anti 349:3 383:5,22 384:3
71 372:25 387:2	911 317:14	advantage 364:15 366:2,25 367:7 368:9, 11 369:6,11,17,22 370:3,10 371:24 372:9	apologies 311:14
72 373:5	92 346:15,16,19	affected 385:11,12, 15	apologize 343:16 345:24 358:23 388:8 397:14
73 373:9	93 347:4,5,8	affidavit 353:9,12,13, 22 355:8,10 356:17 357:2 358:3 359:8,11, 13 360:5,6 386:24	app 320:5
74 375:2,3,14,22,23	94 349:5,6 350:16	affirm 298:24	appeared 308:3 309:17 328:13 330:7 335:18 343:18 344:1 350:14
75 375:2,5 376:3,4,5 381:14	95 351:9,10,15	agree 319:25 320:4	appears 315:7 330:19,22 342:20 349:10 396:23
76 375:2,7 376:4	96 352:20,21	agreed 382:8	applies 297:15
77 360:11,14 375:12,16	98 392:22,24,25	ahead 295:7 319:6 356:8 371:14 383:21 392:19 404:11	appointment 352:24
78 299:11,14 301:12 302:7,16 395:19	99 353:5,6 354:7,14,15	Al 397:3 398:20	appropriately 297:5 343:6
79 303:10,12,16,19 304:1 305:2,9	A	alcohol 351:1	April 359:1
8	a.m. 313:4	allegations 300:13 367:3	Arc 342:13
8 397:9	ability 309:21,22,25	allege 319:2	argumentative 307:24 308:9 310:10 311:3 332:21 335:25 337:11
80 306:3,4,7,18 308:14 309:16	absolutely 315:14 332:25 334:10 350:7 404:22		articulate 313:18 400:1
81 310:13,14,16 311:23 312:1,8	access 308:21,24 320:22		
	accounts 307:13		
	accuracy 396:23		
	accurate 332:2 373:7,13,20,23 374:5,9, 14 391:23		

ascertain 337:21
339:5,6
aspect 312:11 324:15
329:9 367:6 378:15
393:7 395:21
ass 368:23
assistant 395:20
assume 319:24,25
345:23 346:1
assure 389:9
attach 353:12 360:4
attached 304:14
318:11,13 323:1 353:10
403:18
attachment 318:14
323:1
attacked 306:19
attempted 381:25
attention 322:7,11
388:5,11
attorney 307:9
331:22 333:1 357:7,10,
23 358:4,6 371:21
378:9
attorneys 404:16,21
authenticate 305:2
307:3 308:2
authenticity 308:13
authority 297:14
aware 379:18,19,21
386:13,15 397:16

B

baby 317:12
back 303:14 307:16
309:23 310:5 319:21
322:19 329:20 331:6
334:15 342:9 344:3
358:13 369:14 372:17,
20 390:20 394:16
398:6,7
bad 323:21 354:25
bang' 364:13
bankrupt 396:16
base 374:11
based 302:18 337:8
338:4 355:12 356:10,15
367:3 372:4 384:3
385:13,15 398:2
bashing 365:10
basis 296:14,18,22
battered 316:16,25
begin 296:4 298:1
360:20 363:16,20
beginning 396:6
begins 388:25
behalf 295:6
behavior 394:21
395:14
belief 364:22
belittled 300:10
beneath 314:7
benefit 295:25
bit 337:4 355:3
Bitch 317:14
board 348:1
book 295:11
bothering 342:15
bottle 295:8
bottom 304:23 309:9
326:17 330:24 331:15
388:24
boundaries 395:22
boy 317:14 344:21
break 297:20,21,22
356:3 372:14 399:15,25
400:3,6
breaking 391:14
breaks 297:20
Briefly 298:4
bring 307:16 323:20
342:12 397:20 400:13

brought 398:9
Bullied 300:8,10
business 301:6,8,
12,21 373:1,6,10
382:22 401:15
businesses 301:16
312:12 348:22

C

call 300:15 317:14
333:4 334:8 336:14
called 299:4 300:13,
16 303:3,6 344:21
345:3 347:20 391:3
392:22 401:19,21
calling 303:23,24
345:4,18 346:7 348:8
393:17,21,25 394:15
calls 302:10 320:2
322:4 328:1,15 334:22
345:15 353:14 378:9
canvasing 386:17
cap 368:23
care 396:17 401:13,14
cars 378:25
case 295:4 314:13
345:13 352:9,11 360:12
catches 390:2
caused 301:4,5,24
302:7 306:23 337:20,22
cease 387:8,15,18,21
388:18 389:14,20
391:11
celebrity 401:12,20,
21
chair 347:25
changed 332:3,14
changing 332:10
channel 325:13,18
349:20,25 399:6
character 312:11
characterization
301:18
Charles 304:6 347:2
chat 321:21 322:5
chats 400:9
check 353:2
child 367:23 393:18,
21 394:15
child's 326:7
circle 325:6
circles 339:18
citation 359:7
civil 391:15
claim 299:17 300:2
303:19 306:9 310:19
312:1 313:10 317:6
324:13 326:4 337:7,12
340:10,11 342:4 346:19
347:8 351:15 370:10
382:16
claimed 340:21
344:25
claiming 337:19
385:7,11
claims 312:2
clarification 356:20
clarify 320:8 330:11
377:8,11
clean 336:24
clear 296:17 332:7
340:14 350:18 381:9
clerk 295:16 300:8
click 309:10
client 309:8 337:1
350:23 351:1 360:8
367:20 384:17 401:11
client's 348:10
clients 302:20 339:22
368:1,3 379:15 380:2,7
381:17 382:16,18,20,25
383:3,5,22 390:25
394:1 402:16
clock 355:11,16
close 322:6

cobble 327:24	Complaint 307:1 360:11 363:22 368:13 369:7,12,19 370:20 391:20 392:8	contacted 333:22 335:7 353:25 354:1,3 383:3,16 384:13,15,21	correct 299:9 301:8,9 309:3,4 315:16 317:21 319:3 320:16,17 321:21 328:25 330:20,24 332:4,5,9,17 337:9 339:22 340:12,22 345:13 351:6,8 357:23 358:5 359:21 374:16 375:17 376:9,13,21 380:21,22 381:13 382:7 385:22 387:9 388:19 389:15 393:19,20 399:7,12,24 400:2,5,25 401:4
cobbled 330:13	complete 336:15 396:25	contempt 297:14	correctly 351:7 356:19 364:18,21 394:23
cock 329:10,11 366:7 367:4,13	completely 346:6	content 356:10 399:7	corrupt 306:19,20
Code 297:15	compound 296:24	content-wise 355:24	counsel 295:10 367:19 373:18,19 379:12 387:24 391:10 398:4,5 399:2 402:25
collect 362:14	concern 300:16	contents 356:16	counselor 314:18 315:3 321:22 358:12 372:3
collection 359:2,15	concerned 316:19	context 307:21 327:25 332:11 335:22 349:16 350:13 370:7 397:6 398:25	countries 395:22
comfortable 372:2	concise 381:9	continue 295:1 350:22 356:7 377:1 386:16 396:11	County 326:15,25 327:3,5 328:19 336:14 367:21,23 391:21 392:9
comment 303:24 304:23 308:3 309:6,9, 12,16 314:25 322:9 327:14,16 328:4,5 332:9 336:16 339:24 341:4,19 342:18 343:15,24 344:12,17 348:8 349:9,11 351:13 356:11	concluded 405:2	continuous 328:20	couple 355:17
comments 303:16 304:18,20 305:20 309:17 310:3 326:9 327:24 328:9,13 330:9, 20,23 335:17 336:7,8 349:1 350:6 354:5 355:7 356:16,18 357:3 358:2 363:9,10 400:4	conclusion 302:10	contract 381:20,23, 25 382:10,13,17 385:10,12,13,16	court 295:2,16,18,19, 23,25 296:7,9 297:13 298:3,7,9,10,13,14,16, 23 314:11 336:3,9 349:21 353:3 354:13, 17,21 355:11,15,21,23 356:2,5,12 358:15,19 363:6 365:1 366:15 368:4 370:14 372:16 374:22 379:22 383:11, 17,21 385:1,3 388:7 390:19 391:12 392:18 395:1,10 396:17 399:17,20 401:17,25 402:4,5,9,19,22 403:4, 5,6,10,16,18,21,24 404:2,4,5,8,12,13,15, 18,20,23,24
common 378:11,16	Conclusionary 302:10	contracts 373:1 381:12,18 385:8	courtroom 297:13 298:5
communicate 322:24	confidential 400:16,21,22,24	contractual 373:6, 10	
communicated 391:4	confidentiality 331:23 332:11	control 367:19	
communicating 323:10,11	confines 399:23	conversation 305:5 307:5 316:10,18 335:1 340:24	
communication 323:3 340:18,24 341:15,17,21 398:15	confirm 398:18	conversations 334:12 357:6	
communications 357:11 385:20 386:5 398:1	confronted 364:10	convey 398:3	
community 344:11	confused 325:21	Cook 312:15 328:21 331:9,11,24 336:5 337:1,17 341:5 342:9 344:20 346:7,9 347:24 348:24 349:3 350:17,23 351:2 359:1,3 360:20 363:9,20 364:7,11 366:5 367:11,12 370:22 371:2 372:22 379:21 383:9,16 384:10 385:20 386:5 390:12	
company 404:7,8	confusion 379:10	Cook's 393:17	
competency 299:20 304:3 305:3 306:11 310:21 312:5 321:14 338:21 344:14 357:5 359:20 366:4 378:2,9 385:23 389:24 401:6	connect 301:10 348:15	copy 331:22 358:13 367:13 403:9,15	
	connecting 340:11	copying 324:17	
	connection 301:18		
	consequences 399:15		
	consideration 331:16		
	consist 380:13		
	constant 393:18		
	constitute 369:10 370:2		
	constituted 369:16		
	constitutes 370:10		
	contact 331:1 334:17 339:4 341:7,18 384:10, 12,22 404:16,21		

covered 318:1
331:23
coward 326:15,25
327:3,5 328:19 336:14
347:13 348:3,12
CPS 300:13,15,16
create 305:20 352:24
created 396:21
creating 324:18
Creek 300:25 326:14
327:5 328:18 342:12
347:20 362:10 377:10
378:13 391:19 392:7,
14,15,21 393:1,2,6,7,8,
9
criminal 297:14
crook 397:23
Crosstalk 343:17
364:25 398:24
cult 323:19
current 384:5
customer 371:11
customer's 373:10
customers 370:23
371:4 373:2,7,21 374:7,
11,20 402:15
cut 309:9 323:6
cutting 396:23

D

daily 361:23,25
386:15,16
damage 306:23
337:20,22 338:19
367:25 402:14
damaged 301:4
damages 338:1
data 320:6
date 296:25 307:21
313:7,9 320:23,25
321:3,4 327:13,15,21
329:19,21,23 396:24

dated 386:24
daughter 367:15
371:11
Dave 324:25 325:2,13,
19
David 349:11,14,19,
23 350:10,17
David's 349:11
day 343:21 362:3,16,
17 363:13 393:19,23
394:3,4,5,12
days 362:23,24
402:24 403:2
Dead 347:20
Dean 322:17,21,22
323:1,3,10,12
Deanna 342:25 343:2
380:25 381:4
death 323:21
December 397:9
decide 302:11
decided 323:15
decreasing 301:15
deemed 307:19
defamation 312:11
313:19 348:21 362:24
364:1 367:6,11 401:14
defamatory 299:18
301:5,11,13,15 302:7,
16,19 303:20,25
306:10,17 308:23
309:1,14 310:20,25
311:6,11,15,20,24
313:11,17 314:8,12,14,
21,25 317:7 323:18
324:13,19 326:5,8
329:8,9 335:23 336:12,
20 337:4,8,12 338:2
340:10 342:5,16 344:5
346:20 347:9 348:15,19
350:16,20 351:2,16
360:21 362:14 363:1,20
370:22 371:3 376:8
379:14 387:19,22
388:5,12,16 389:6,8,9,
13,22 390:2,3 400:8

defendants 295:6
303:12 387:25
defendants' 299:14
306:4 310:16 312:21
315:25 321:9 324:8
326:1 329:4 333:18
342:1 344:7 346:16
347:5 349:6 351:10
352:21 353:6 358:10
360:14 375:3,5,7 376:1
386:20 396:2
delete 350:8 389:2
deleted 336:5 356:24
deletes 350:9,10
demand 366:24
369:6,7,10,16 370:2,10
388:25 389:5,12
demanded 371:24
demanding 368:8,
10
demands 388:18
389:20
Denied 376:17
deny 323:22 324:1,4
377:19
depicted 344:17
deposed 299:5
deposition 296:12,
19 297:1,6 298:19
310:8 343:5 359:22
402:5,10 404:6 405:2
depositions 298:19
describe 319:15
320:12 392:8
describing 371:3
393:7
description 391:23
392:10
descriptives
393:10
desist 387:8,16,18,21
388:18 389:14,20
391:11
destroy 312:12
382:21

destroyed 300:11
314:3 326:6
destruction 401:14
detailed 392:10
detailing 393:7
determine 315:6
diapers 347:20,21
348:8
difference 381:4
difficult 296:7 307:13
digest 313:15
Digit 403:13
Digital 403:14
digitally 403:19
direct 299:6 357:10,
11 384:10 385:19 386:5
398:1
directly 358:5 383:16
384:15,21
dirty 336:13,17,20,24
337:8,15,22 338:1,3,7
339:12
disabled 326:7
disappears 320:7
328:4
discovery 345:8,10
359:18 360:2 375:1
discrepancy
373:25
discusses 353:13
discussion 296:21
distinct 371:15
distinguish 325:11
document 306:1
311:9 312:24 315:9
327:4 354:22 372:12,13
373:17
documented
322:20 327:18
documents 376:2
396:9
dog 347:21,25

dollars 346:24
donations 314:10
doodle 329:12
dots 301:10
doubt 396:23,25
downtown 393:1
dox 312:12
doxing 312:16
draft 373:17
drafted 371:22 390:9
drastically 385:11, 14
drawn 332:4
drive 378:16
driving 364:8 365:16 378:15
drove 378:25
drugs 350:22 351:5
due 302:15 315:3 329:20 348:18 354:7 384:7 402:16
duly 299:5
dumped 347:22 348:9

E

earlier 333:2 384:19 387:1
eco 383:23
ecosystem 349:3 383:6 384:4
efforts 382:21
Egypt 342:11
Elizabeth 331:9
Elmo 295:12
email 302:25 303:4,5, 7 318:15 333:24 343:19 395:19 398:15 399:1 403:17

emailed 331:2 398:4, 6,7
employ 377:25
encourage 296:8
end 317:15 345:18 400:23
enforceable 373:1
engage 340:18,23 341:16
engaged 316:17
enter 364:8 365:17
entire 393:24
erased 350:7
escalating 394:22 395:15
establish 339:11
etcetera 388:13,14
evaluate 340:25
event 305:24 310:13 360:3
evidence 301:17,20, 23,25 302:1,3,6,15,18 306:22 308:7,13 312:2, 9 338:18,23 357:2,12, 16,25 358:2,6 359:9,14 380:7 383:15,18 384:9, 14,17,20
evidentiary 345:12
evil 323:19,21
exact 329:21 332:23 346:12 395:2
EXAMINATION 299:6
excuse 367:11 387:11 399:19
exhibit 295:11 299:11,14,17 300:2,19 301:7,12,21 302:7,16 303:10,12,14,16,19 304:1,8 305:2,8,9 306:3,4,7,9,18 307:4,8, 10,18 308:2,14 309:2, 16 310:2,13,14,16,19, 24 311:9,16,23 312:1,8, 20,21 313:11 314:25 315:11,13,16,20,24,25 316:3 317:6 321:8,9,24 322:3,13 324:7,8,11 325:18,24,25 326:1,4 327:6,11 328:14 329:2, 4,25 330:4 331:4,5,10 332:16 333:15,16,18 335:10,22 341:25 342:1,4,21,24 343:6 344:1,4,7 346:2,15,16, 19 347:4,5,8 349:5,6 350:2,13 351:9,10,15 352:21 353:5,6,10 354:7 358:9,10,21 359:8,10 360:5,11,14 365:9,24 375:3,5,7,12, 14,16 376:5 381:14,16 386:19,20,24 387:11, 20,21,23,25 391:25 392:3,4 395:19,25 396:2,5,21 397:7
exhibits 299:9 318:25 330:5 343:3,9 361:9,10,12 375:2,20 384:19 403:18
exists 328:4 335:16, 19 336:4,6 350:15
expect 297:6 310:4 345:21 386:4
expectation 345:16
expected 346:1
expert 340:25
expired 402:1
explanation 325:14, 16
extent 338:18,23 399:13 401:10
extort 364:14 366:1 367:25
extorted 371:16
extortion 367:7
extortionist 402:15
extra 395:6

F

fabricated 305:15,

18 330:4,5
Facebook 303:17 305:21 307:13 308:3 317:25 321:20 322:9 323:4 330:19,23 331:12,17 334:11,12,16 336:6 338:17 339:20 340:16 341:11,19 342:19 349:9,11 351:13 356:22 362:6 364:16 369:2 379:20 381:13, 17,21 382:5 384:1,6 385:9 394:6,7 400:9
fact 302:17
factual 336:16
fag 317:9 344:21
faggot 346:8
Failey 331:9
fair 313:10 341:24 397:15
fake 324:16 332:19
false 300:2,5,13,18 301:3,5,21 306:23 311:1,7,12,21 313:24 317:7 336:16 337:13,19 380:25 381:1,5,7 402:13
falsely 364:16
falsity 370:21
familiar 317:24 321:18
family 342:12,14 362:11
fan 400:4
fans 326:18 348:5 374:11
fast 355:12,17 367:2
fat 348:6
favorable 399:23
federal 336:3
feel 372:2
feeling 366:20
feels 314:6

felt 308:22	25 370:1,8		Grace 347:22
female 316:15,17,18	forever 310:5 320:18 350:8	G	grandson 314:15
fiancée 329:10 364:16	forget 372:6		grandson's 314:3
figure 400:25 401:12	Forgive 358:24	Gail 348:1	Granger 300:21 377:6,14,15 379:2 380:19,20
figures 401:2	form 296:21,22,24 299:19 302:9 306:12 307:23 308:8 310:9,21 311:2 312:4 319:5,17 320:2 328:1,15 332:20 334:20 335:24 337:10 338:20 339:1,8,13 340:3 344:13 345:14,19 353:14 357:4 359:19 360:7 366:3 376:10,22 378:1,8 380:14 385:23 389:24 399:7,11 401:5, 22	garbage 314:12,13 347:17 348:2	Grangers 376:21 380:24
file 308:20,22,25 365:19 397:17,19 398:8 399:1,2	format 403:10	gave 318:9,19 331:22 332:25 354:13,17	greatly 296:25
filed 307:1 360:12 391:15	forthwards 308:20	gay 303:23,25 344:21 345:18,19 346:7 365:10	Green 304:6 347:2
filibustering 366:20	forward 303:8 379:4	general 377:10	Griffis 390:24 391:3, 4,10
Filing 314:13	forwarded 302:21	generally 311:10 372:6 374:10	ground 377:9,13 378:6 379:18 393:12
filthy 303:23,25	found 347:20,22 377:13 379:22 393:12 395:8,16	George 332:13 350:3	group 316:16
finally 391:14	foundation 319:6, 18 345:15 376:11 380:15	George's 331:24 332:3,15 366:7 367:5, 13	groups 356:23,25 362:6
find 331:6 341:21,22 358:24 376:4 384:12,22	fourth 358:23	George's/martha' s 342:11	guess 336:1 351:14 352:1,4 353:1 355:11 397:13
finds 308:25	frame 363:25	Georges 331:20	guidance 372:3
fine 314:22,24 355:22 401:10 404:11	frank 322:6,10	get all 336:7	guilty 379:22
finish 296:3 315:4 363:3 366:11,16 378:21 383:19 392:19	free 399:10,13,16,22 405:1	gifts 363:24 367:8	gun 333:16 364:7,10 365:16
finished 296:5 323:25 350:21 365:1	freedom 399:14	give 298:25 317:4 318:21 329:21,22 343:4 354:11 371:25 372:8,23 376:7 377:5,11 385:21 386:6	Guy 397:10
firearm 345:17	Friday 313:4	giving 295:11	guys 404:10
firm 390:24	friend 300:22	Gleason 331:1,2 333:17,21 334:13,18 335:2	
Fla 371:17 372:4	friends 316:15 362:10	glossary 403:12	H
flip 329:24 371:14	front 295:13,15 299:8, 12 306:7 307:17 310:14 319:11 324:11 360:12 375:10 376:5	goal 396:18,19	Hale 373:11 374:1
Florida 371:22 391:21 394:23 395:18	fucking 346:8 348:5	God 323:20	Hales 295:4,6,14 296:2,5 297:19,21 298:14,15,16 299:3,8 310:23 311:5 313:1,16 315:21,22 319:13 321:18 326:15,18,24,25 327:1,5,8,9 328:18 330:15 337:6 338:13, 14,18,25 339:6,21 340:2,17,22 341:6 347:24 348:13 349:1,3 357:21 360:21,25 361:10,11 363:12 364:6,7,8,10,11 365:5, 16 367:15,17,18,22 368:22,25 370:23
flow 328:24	full 309:24 310:2,6 350:13,24 351:4 364:23	gofundme 312:23	
focus 337:24		gofundme.com 312:25	
follow 339:25 399:6		good 295:2 299:8 309:23 336:24 353:1 355:22,25 363:7 401:8	
follow-up 390:23 391:2,7,13		good-looking 332:19	
followers 336:13,17 337:21,25 338:7 339:11		gotcha 352:14 382:6	
font 332:22,23			
footnote 364:19,20, 23 365:6 366:5,10,24 367:1 368:8,10 369:16,			

371:4,10,16 372:25
373:7 374:1,16 378:22
383:6,22 384:3 388:6,
12 389:3 396:22 399:6
Hales' 360:24 364:9,
10,14,16 365:17 370:22
371:4 383:4 391:21
392:9
half 313:23 325:6
391:5
hand 298:24
hands 396:9
happen 401:13
happened 327:21
369:19
happy 342:14
harassing 394:22
395:17
harassment 367:11
395:21
hard 403:15
Harley 347:21
harm 301:4 306:23
hate 324:18 401:10
hater 400:5
haters 396:6,8
hates 344:11
heads 372:23
hear 298:10,11
heard 314:24 339:22
342:8,10
hearings 379:22
heart 314:19
heavy 378:18
helpful 295:23
helps 296:25 350:18
hey 309:22 340:1
highlighter 313:12
highways 392:16,21
hiring 340:25

hit 391:14
Hold 357:20 366:15
383:11
Holdsworth 302:22
homophobic
351:20
honest 325:22
329:23
honestly 325:15
339:16
Honor 366:21 367:16
372:15 390:17 395:9
hour 355:19,24 362:25
391:5
hours 297:18,19
363:7 393:25
hours' 386:18
humiliated 300:10
hundred 322:18
392:15 398:19
hundreds 338:15
351:20
hurt 368:22
hurting 314:6

I

icon 321:19 322:3,4
324:24 325:3,12,18
icons 322:8
idea 320:23 325:15
329:19
identification
299:15 303:13 306:5
310:17 316:1 321:10
324:9 326:2 329:5
333:19 342:2 344:8
346:17 347:6 349:7
351:11 352:22 353:7
358:11 360:15 375:4,6,
8 376:9 377:21,24
386:21 388:1 396:3
identified 381:12
394:13 402:13,15

identify 311:6,12,20,
21 338:5 376:8 377:20
379:1
identifying 303:25
illegal 401:16
image 332:8
imagine 298:17
immediately
360:20 363:15,16,20,21
364:1 389:1,2
improper 340:18
341:3,7,14,15,16,18
inaccurate 352:14,
16
inadmissible
307:20
inappropriate
336:21 340:24
incident 365:16
include 297:20
included 306:25
328:14 335:21
including 368:7
388:13
income 301:6,8,16,
22,24 302:2,3,4,6,8,15,
17,18 306:24 338:2,4,6
340:7,11 341:1 348:16,
18,21 384:5,7 385:11,
12,14
incorrect 345:24
357:23
incredible 333:4
indicating 354:14
355:1
indiscriminate
389:14
individual 316:19,
21,24,25 317:23 318:8,
19,23 321:6 322:23
339:5,25 340:1,15
373:21 374:6 378:25
individuals 312:14
338:3,5,12 340:19,21
374:14 376:20 377:12
381:6

information 317:3
378:15 380:13 382:1
394:17
initial 383:20
injuring 301:15
injury 364:13
inquired 398:1
inquiry 380:11,12
inserted 318:14,15
inside 332:4 333:2
Instagram 318:12,
13,21
instances 371:16,
19,23 372:1,7,13,22
instruct 296:16
intend 297:3,4
intent 364:14 366:1
intentionally
373:11
interests 389:3
interfered 381:13,17
382:17 385:8
interference 402:16
interferes 373:12
internet 338:14
380:1,3,4,8
interpretation
336:18
interrupt 366:13
interrupted 311:17
interrupting 296:6
370:11
interruption 356:7
intervene 297:4,8,9,
10,11
issue 384:23,24
items 359:3

J

Jeremy 299:3

303:23,24 306:19,20
315:21,22 317:11
326:14,24,25 327:5,8
328:18 338:13 341:6
347:24 348:13 350:19,
22 351:5,22 360:24,25
366:6 367:3,12,15,17,
18,22 368:21 371:10
383:4 388:6,12 401:8

Joe 341:4,7 374:15

John 303:23,24
306:19 312:15 328:21
331:8,11,24 336:5
337:1,5,17 341:5 342:9
344:20 347:24 348:24
349:3 350:9,17,23
351:1 352:1 363:9,23
367:12 379:21 380:6
383:9,16 384:10

judgment 318:24
319:1,11 353:11 359:7

jumped 333:16

junk 361:1

jury 302:11

justification 373:12

K

keyboard 329:15

kill 323:20

kind 334:18 361:21
363:24 367:8 384:11

kinds 344:21

knew 336:1

knowing 370:20,21

knowledge 305:23
307:8,10 335:12
349:19,23 362:9 373:9
390:23

knowledgeable
373:6

L

Lack 345:14

Lacks 319:18 376:10
380:14

large 359:2,15

law 399:13,15,23,25
400:3,6 401:10

lawsuit 308:23 309:1
312:3 396:13,14,19

lawyer 305:6,13
345:9 353:25 354:2,4
360:8 376:24 390:9
396:15

lawyers 382:9

lead 301:12

leader 323:19

leading 296:24

learn 303:2 361:16

learned 302:24 303:1

leave 364:11

lectern 295:13,17,20,
22

led 308:15

left 304:24 313:3
355:24

legal 307:6 308:24
372:3 373:18,19 396:9

legible 358:16

Lemmerman 353:9,
12,19 354:5 355:7
357:3,23 358:2,4

letter 332:12 333:3
387:8,16,18,21 390:24

Levy 326:15,25 327:3,
5 328:19 336:14
367:21,23 391:21 392:9

LGBTQ 344:11
351:21

liar 347:12,14 348:3,8,
13

lie 300:25 347:17

lied 314:15

lies 300:11 350:19

Liezy 331:9

life 314:3 326:7 348:6
382:21 401:15

light 378:14

limited 378:22 388:13

link 344:16 365:9
396:23 397:10,12

links 382:23,25 383:4
384:2

list 318:25 345:19

listed 379:9

Listen 383:11

listened 391:4

literally 341:10

litigation 345:24

live 334:22 335:1
363:1 393:24 396:22
397:9 398:20

Liz 354:11

long 304:24 358:17,22
362:21 383:13 399:25
400:3,6

longer 338:6,13,17,24
339:21 340:16,21
341:6,8,10

looked 305:20 317:25
337:4 343:11 384:18

looky 398:9

lose 338:2,4 348:18
384:6 396:13

loss 301:6,8,20,22,24
302:2,3,6,8,18 306:24
340:25 384:5

losses 339:11

lost 301:12 302:15,17
340:11 348:16,18,21
402:16

lot 313:15 334:8,9

loud 298:9 350:24
360:19 364:5 368:19
379:7 396:6 397:8

love 401:9

lying 350:20

Lynette 309:8 312:14
316:9,16,17 317:20
322:23 323:9,11 349:4
350:9 363:23 379:19,23
380:6 384:15,20 391:3,
5 401:11

M

Madam 298:10

made 304:18 314:11
327:16 344:12 348:25
359:3 363:8,9 384:10
389:21 390:12 400:8

magistrate 397:13,
16,22 398:2,4,5,6,7
399:1

magistrate's
397:18 398:14,16

mail 313:3

main 384:4

maintains 373:1

major 378:12,13
392:16,21

make 295:15,24
296:2,4,10,13 297:5
298:8 301:17 314:14
324:17 332:18 342:13
348:4 371:7 396:15,18

makes 296:7 336:13,
17 337:21,25 338:7
339:11

making 314:9,11
342:14

maliciously 364:13

man 317:9

manner 376:9
377:20,24

March 307:1 386:25

mark 313:13

marked 299:14
303:12 306:4 310:16
312:21 315:25 321:9
324:8 326:1 329:4
333:18 342:1 344:7
346:16 347:5 349:6

351:10 352:21 353:6 358:10 360:14 375:3,5, 7 386:20 387:25 396:2	20 404:17	Michael 322:17,21,22 323:12	395:4
marketing 384:4	mayor 303:3,6 306:21	Michelle 309:8 312:14 316:9 317:20 341:5 348:24 362:4 384:14,20	moved 374:2
marriage 362:12	mayor's 395:19		moves 364:12
Martha 308:20 309:2, 22 327:12,23 331:22 332:3,13,18 335:14 336:1 338:13 342:14,22 343:1 346:3 350:2	meaning 362:2 371:17 377:19 386:16	Middleton's 325:3, 13,19 349:20,24	moving 372:25 395:24
Martha's 331:21,24, 25 332:6,14	means 296:12 310:25	midnight 394:3	multiple 307:13 331:2 337:23 346:10 348:21 352:13
match 368:25	media 360:22,24 361:5 362:2 368:20 383:6,23 384:4 388:14 394:8	millions 351:21	multiples 300:6
matching 347:21	meeting 348:1 364:7	mine 353:1	Muslim 342:13
matter 295:3 307:14 350:8,9 379:23 400:23	Melissa 353:9,19	mini 403:12	
Matzkin 295:5,9,18 296:3,4 297:18,21 298:1,2,17,21 299:7,16, 21 300:1 302:12 303:10,15 304:5 305:7 306:3,6,16 307:25 308:11 310:12,18,22 311:4 312:7,20,22 315:23 316:2 319:8,22 320:9 321:8,11,17 324:7,10 325:24 326:3 328:7,22 329:2,6 333:8, 15,20 336:10 337:14 338:22 339:3,9,14 340:8 341:25 342:3 344:9 345:20 346:15,18 347:4,7 349:5,8 350:1 351:9,12 352:20,23 353:2,5,8,18 354:11,15, 19,22,24 355:1,5,11,14, 19,22,25 356:8,9,14 357:9 358:9,14,17,20 359:25 360:9,16 363:11 365:3 366:9,14,19,22 367:16,19 368:6,16,18 370:13,16,18 372:14, 19,24 374:23,24,25 375:9 376:12,23 377:4, 23 378:4 380:17 381:3 383:14 384:8 385:3,5,6, 25 386:11,19,22 387:5, 6 388:2,9 390:5,17,21 391:17 393:4 395:3,6,9, 12,13,25 396:4 399:5, 18,19,21 401:18 402:7, 11 403:1,3,8,11,14,17,	member 348:1 356:24		N
	mentioned 296:20 297:12 315:1 326:13, 16,20 391:18	minutes 304:25 355:12,17,20 363:8 374:23 385:4 391:12 395:1,7 399:17,20	names 303:23,25 345:5 376:7,17,19 377:5,12,21
	merchandise 374:15	mixes 351:1	Nancy 302:22
	message 304:14 308:18 318:3,4,10 319:20,24,25 320:5,13, 14 321:13,25 322:14,16 323:2,6,8,14 330:23 331:17 334:4	moment 311:8 315:4 336:6 375:19	natural 328:10 389:18
	messaged 316:4,8 334:16	monetization 381:24 382:7	needed 336:2
	messages 316:10, 13,14 317:19,21,25 318:21 319:3,9,14 320:24 321:3 331:8 334:15 335:6,8 400:15	money 314:14 316:17 339:7 363:24 367:7 372:9 396:15,18	negative 400:2
	messaging 331:13, 14	monitor 361:23,25 362:1,10,13	neighbors 323:21
	messenger 321:21 322:5 323:4,21 334:11, 12	monitoring 362:4	nice 390:4
	messes 368:24	monster 314:5	night 362:25 386:18 393:25 394:11
	met 316:16 335:4 368:25	months 356:23	night's 363:8 394:13
	metadata 307:16 310:6 320:14 328:3 329:21 335:16,19 336:4,5 344:2 350:7,10, 15	mooches 346:23	nil 303:24
		morning 295:2 299:8 384:19 394:11	nineteen 394:25
		mosque 342:13	non-defamatory 390:13
		motion 353:10 359:8 397:17,19 398:8 399:1, 2	normal 296:12
		mouth 348:10 359:4 366:7 367:5,13 397:19 398:11,14,16	notes 356:21
		move 302:21 310:13 325:23 333:10 360:3 363:4 370:16 372:16,19 380:18 381:11 390:22	number 295:4 299:14 303:12 310:16 312:21 313:22 314:18,19 315:25 321:9 324:8 326:1 329:4,25 333:18, 22 334:6 342:1 344:7 346:16 347:5 348:25 349:6 351:10 352:21 358:10 360:14 364:4 365:7,8,15,23 367:1 375:3,5,7 376:6,16 378:11 379:6 380:10,21

386:20 387:25 388:4
394:24 395:2

O

object 296:22 298:8
389:24

objected 376:25

objection 296:13,15,
21,23,24 299:19 302:9
304:3 305:3 306:11,12
307:23 308:8 310:9,21
311:2 312:4,10 319:5,
17 320:2 321:14 328:1,
15 332:20 335:24
337:10 338:20 339:1,8,
13 340:3 344:13 345:14
353:14 357:4 359:19
360:7 366:3 376:10,15,
22 377:22 378:1,8
380:14 381:2 385:23
386:8 401:5

objections 297:1
298:6

obtain 316:3

obtainable 380:13

occasions 333:22

offensive 329:13
332:12 333:6

office 404:2

Ohio 303:3,6 364:6
367:18,21 379:21
391:13 394:22 395:17,
19

Olight 381:13,17
385:9,10,12

ongoing 393:18

online 310:5 312:19
320:5,17 359:1,14
363:25 369:2 379:20
393:17,21 394:4,7,8,15
395:21

open-ended 383:12

openly 383:23

opiates 350:25 351:6

opinion 401:7

opinions 399:7,11,
16,22

opportunity 321:1,
2,24 337:17

opposed 325:19
331:17 348:25

opposition 318:24
319:1 353:10

options 382:23,24
383:25 384:3,5

oral 364:16

orally 399:11

order 317:18

ordering 403:7

orders 391:15 403:7

origin 305:8,9 307:8
316:13

original 304:17,20
305:21 307:1,20 308:4
309:5 323:14 328:13
333:13 335:15 343:14,
24,25 350:5 354:12,20
358:13

originally 309:17
360:11

Otter 300:25 326:14
327:5 328:18 342:12
347:20 362:10 377:9
378:13 391:19 392:7,
14,15,21 393:1,2,6,7,8,
9

outlined 372:13

P

p.m. 405:2

Padgett 376:21
377:7,14,16 379:1
380:19,24

pages 327:10 328:18,
20,23 329:3,8 358:22
388:13 400:9

paid 319:20 322:6,10

paper 305:20

para 326:22

para- 313:14

paragraph 313:14,
21,22 314:1,2,9,18,19
350:23 358:25 360:18,
19 363:16,19 364:4,21,
23,24 365:4,7,8,23
366:2,5 367:1 368:7,9,
14 369:6,9,13,15,20,25
370:6,7,8,19 371:13,14,
15 372:21,25 373:5
375:20 386:23 387:7,16
388:4,16,21,25 391:18
392:2,6 393:16

part 345:23 349:4
365:7 379:10 389:1
394:1 400:21 401:16
404:25

partial 295:3

participated 363:1

parties 297:12

partner's 359:4

passing 354:22

past 372:16 394:3

pasted 323:6

pasting 324:17
396:24

pause 296:8 298:11

pay 352:2,10,12

pecuniary 364:15
366:1,24 368:8,11
369:6,11,16 370:3,10
371:24 372:9

pedifile 393:25

pen 313:13 329:17
333:2

pending 333:12,14

Peninsula 303:3,6

penis 359:4

Pensacola 397:20,
24 398:9 399:3

pentagram 329:12
332:4,6,12 333:2

people 300:24 312:17

314:6 338:16 339:20
342:15 348:25 371:8
376:7 377:20,25 378:7,
15,16,17 392:15 397:25
399:6 400:7 401:3

percent 322:18 349:2
365:14 398:19

period 364:3

person 316:8,9,14
318:2,9,18 320:13,15,
21 335:4 342:23 379:1

personal 307:8
401:15

personally 373:22
374:7

persuade 370:22
371:4,8,11

phone 304:12 321:19
322:3 329:25 334:4,5,
22 335:1 391:6

phonetic 401:24

photographs
364:17 393:11

physical 312:13

pick 308:22,25

picture 366:6 367:4

pictures 324:16
359:4 379:25 380:3,4

piece 305:20

pile 299:9

pinpoint 373:24

pissed 351:21

place 356:1 358:24

plan 305:2 307:3

planning 339:10

plant 297:4 298:5

platform 367:9

platforms 360:22
388:14 394:8

pleasant 389:10

plenty 345:2

point 296:15 297:20

325:8 352:5 356:21
369:10,15 370:2,9
371:24 372:8 374:3
384:2 391:14
police 365:12,15,19
politeness 341:22
positive 400:2
possession 305:25
345:12,22 400:14
possibly 318:5 368:1
post 303:17 304:17,21
307:20 308:4 309:6,16,
18,24 310:3,6 322:9
335:15 342:19 343:14,
25 349:12 350:6,14
351:13 361:14 366:6
367:4,13 379:20 390:12
393:17,21 394:15
posted 309:6 310:5
319:2,3,9,14,16 320:1,
4,6,8,12,15,17,19
328:20 331:11 344:23
359:1,14 361:6 366:6
368:20 377:9,13 378:6
379:3,20,23,25 380:7
388:5,11 390:8 391:19,
20,23 392:7,12,14,19,
20,24,25 394:4
posting 319:21
320:11 322:1 341:13
348:14 359:4,10
postings 388:19
389:2,6,7,8,12,13,20,21
390:1,3 394:9
posts 305:21 317:25
324:17 328:13 356:22
361:3,12 362:2,4 369:1
394:6,7
potential 313:12
potentially 342:25
373:25
potted 297:4 298:5
predator 393:18,22
394:15
prehearing 296:20
prepare 308:16 321:1
343:2

prepared 304:8
308:6,13 309:2 310:2
317:3 327:6,11 329:22
341:1 342:21,24 346:2
350:2 394:20
prepped 394:19
present 295:5 297:14
308:7,13 309:15 341:2
362:3
Preston 295:4
312:15 316:9,16,17
317:20 323:10,11,14
341:5 348:24 349:4
356:23,24 360:20,23
362:4 363:20 368:20
370:21 371:2,16,24
372:8 373:5,11 379:19
384:15,21 385:20 386:6
390:12 391:3,5 401:11,
19,21
Preston's 309:8
356:22 393:17
presume 402:8
pretend 297:3 298:18
pretty 317:15 332:18
344:10
previous 311:15
primary 382:24
print 382:4
privacy 333:1
private 308:18
317:19,21,24 318:4,10
319:3,9,14,20,24,25
320:7,13 321:13,25
322:5,14,16 330:23
331:8,13,14,17 356:22,
25 400:15
privilege 296:17
privileged 296:15
problems 297:7,8
proceed 296:11
299:25
proceedings 295:1
process 400:12
403:20

produce 345:7
350:13 365:21 386:13
produced 345:13
359:18 360:1 361:14
385:22 386:4
producers 352:2,11,
15,17
produces 345:10
producing 325:18
product 378:9
Production 376:2
projector 325:8
promotion 363:24
367:8 382:24
proper 319:15
341:21,22,23
properties 393:3,8
property 344:21
364:9,10 365:17
391:21,24 392:9,12,13,
17,23 393:9
protect 312:14 333:1,
6
protection 312:19
391:15
prove 364:17 378:5
proves 348:3
provide 317:3 320:25
321:4 335:16,20 336:4
338:11,15 344:2 350:5
provided 304:10
331:4,5 335:9,12
353:22 357:12
providing 383:17
public 319:20 322:1
364:8 365:17 378:14
382:1 400:25 401:2,12
publication 379:13,
18
publicly 301:13
320:19 364:15 368:2
398:8
publishing 360:21
363:20

pull 375:21
pulled 364:7 365:16
pulling 345:17
397:22
punches 397:22
purchased 312:13
374:15
push 398:23
put 327:20 331:24
333:2 348:3,10 368:23
380:2,3 394:2 398:11,
13

Q

qualify 389:5
question 296:3,6,9,
19,25 299:22 301:19
302:13,14 308:1 309:20
311:10,15,18,19,23
315:7 319:10,12 321:23
325:17 326:19 330:11,
14 332:7 333:12,14
337:6,7,24 339:15
341:17 343:5 349:17
350:12,21 353:11,16
355:6 356:10,15,16,19,
25 357:1,8,18,22 358:1
359:9,12 363:5,6,13,18
365:2 366:11,14,16,18,
23 368:5 370:15 371:1,
5,18 372:3,17 373:18
374:5 377:8 378:3,23,
24 379:7,8,16 380:11,
12,16,18 381:9 383:15
384:9,25 385:1 386:1,2
388:15 389:18 390:7,8,
16,19,22 391:22 394:20
395:5,23,24 400:17
401:17,25
questioning 295:22
297:19 379:11 402:12
questions 295:10,
17,20 298:1,14 327:10
337:23 354:9 357:15,24
360:10,20 370:12 375:1
383:12 386:25 402:2,
17,18
quote 368:21,23,24
371:3 387:18 392:7

quoted 387:22
388:15

R

racist 342:15

radical 342:13

raise 298:23

ramming 345:18

ran 300:20 317:11

rants 348:4

raped 367:15 371:10

rapist 367:18,23

rapists 367:21

reached 354:2

read 299:23 306:13
311:8,16 313:16 321:24
338:7 339:22 341:3,4,
19 344:10 349:13,16
350:11,22,24 351:3,7,8
354:9 355:9 356:7
359:5 360:19 361:1
364:5,18,19,20,24
365:4,6 367:2 368:19
370:9,24 372:11 373:3
376:14,16 379:7 387:24
394:23 396:5 397:7,10,
11,23 402:3,18,20,23,
24

readable 354:8

readily 380:13

reading 299:25
315:4,5,6,12 317:11
321:22 323:23 364:20,
22 403:21,24

reads 376:1

ready 295:21 298:20

real 305:15,16,17

realize 307:18

rear 345:18

reason 310:1 342:10
360:4 389:19

reasonable 380:11,
12

recall 302:23,24
303:1,9 304:9,11,13,16,
19,22 305:1,10,11,12,
14 306:2 313:6 316:6
318:12,19 321:7,25
322:15,25 331:7
334:15,19,20,21 343:21
345:2,9 346:12 380:9

receipt 305:9

receive 303:5 343:12,
19,20 367:9

received 303:4,7
304:14 305:11 313:4
320:16,21 321:5
322:15,25 323:8,14

receiving 351:19
352:7

recent 395:18

recently 360:25
382:18,20 393:22
394:14

recess 297:23

recollect 322:21

recollection 333:25
334:1,7,14 352:5
359:21,23

record 296:14 322:18

recruit 342:11

redemption 295:3

refer 363:15 374:18
388:21

reference 315:13,17,
22 322:19 327:4,8
328:3 329:9 336:15
337:1 347:16,19 348:13
349:24 365:8,24 371:7,
15 387:15

referenced 324:23
331:20,21 359:10,24
365:23 388:4

references 355:8

referencing 329:7
352:1 370:7

referred 337:9,16
365:10

referring 325:9
352:6,15 371:21 372:12
375:11,20 381:14,16
388:10,23 389:6 391:25
393:22 394:6

refers 372:22

reflect 318:5 356:17

reflecting 361:3

regard 349:2

regular 403:11

related 348:8 389:2

relationship 373:7,
10,12,16 374:4,10,19

relationships
373:2,15,21 374:4,6,14
382:22 401:15

relative 363:16

relevant 309:11
363:21

reliable 342:8,10
398:21

remain 295:9

remember 307:14
316:23 317:1,4 343:7
346:4,7,9 398:19

removal 388:19

remove 312:13 384:2
389:2,12,20

removed 356:23,24
383:24

repeat 302:13 349:21
355:6 356:13

repeated 344:22

repeating 346:9

rephrase 299:22
302:14 363:18 366:18
371:5,23 386:3 389:16
395:23 400:17

replies 349:10

reply 349:11

report 365:12,15,19
383:23,24,25 384:1,18

reporter 295:16,19,

23,25 296:7,10 298:9,
10,13,23 336:9 349:21
354:13,17,21 356:12
358:15,19 388:7 402:6
403:5,6,10,16,18,21,24
404:2,4,6,8,12,14,15,
18,20,23,25

reports 384:3

representation
307:6 308:24

reputation 364:14

request 360:2 372:11
375:14 376:2

requested 364:11

requesting 402:19,
22,24

requests 359:18

rescue 300:11 314:10
362:11

respect 315:3 354:7

response 308:10
310:11 321:16 345:7
356:4 357:17 359:18
360:1 370:4,5 386:10

responses 375:1,
14,24 376:1

responsive 363:4

rest 309:23

Restano 401:23

restate 379:16
380:16 386:2

restraining 317:18

result 332:15 339:11

retained 391:10

retrieve 336:6 344:3
381:25

returned 364:6

review 380:12

reviewing 299:24
306:14 312:24 315:9

revisit 372:23

rich 314:5

Rizk 308:20 309:2,22
327:12,23 332:13
335:14 336:1 338:13
342:22 343:1 346:3
350:3
road 347:20,21 376:8,
20 378:16,18 397:15
roads 378:12,13,16
391:20 392:8 393:1
roadside 379:14
roadway 364:8
365:17
rolling 356:5
Route 392:22,23,24,
25
row 337:23
rule 297:1 397:20
ruling 298:8
run 298:19

S

sake 322:13
sanctions 397:17,19
scolded 347:25
scratch 387:12
scream 342:15 391:6
screen 328:24 330:12
screenshot 304:12
308:19 309:19,24
317:25 322:20 324:25
328:6,9,20 330:3,6,8,9,
16 331:11 332:2,8,14
335:13 338:11,12 360:5
361:13 363:2
screenshots
307:12 318:11 327:20
331:13,14 332:19
353:12 356:21 359:16,
17
seat 300:20
security 312:18
seek 369:22

sell 352:13,18
selling 359:3
send 316:20 391:11
400:22
sender 400:15
sense 378:11,16
sentence 313:17
350:24
sentences 397:1
separated 371:16
September 313:4
service 381:24 382:7,
8 385:9,17,18
services 382:3
set 297:18 362:18,22,
23
sex 359:2,15 364:16
share 377:17 397:14,
15
shared 323:9,15
331:18 398:5,6,7,25
399:2
sheep 346:23 351:22
shelter 316:25
362:11
shit 348:4
Shochet 295:5,14
296:13,16 297:22
298:3,4 299:19 302:9
304:3 305:3 306:11
307:23 308:8 310:9,21
311:2 312:4,10 319:5,
17 320:2 321:14 328:1,
15 332:20 335:24
337:10 338:20 339:1,8,
13 340:3 344:13 345:14
353:14 357:4 359:19
360:7 366:3 368:15,17
376:10,15,22 377:2,22
378:1,8 380:14 381:2
383:19 385:23 386:8
387:4 389:24 401:5
402:2,18,21,24 403:2,9,
13,22,23 404:1,3,5,10,
19,22

short 344:10 402:8
shot 330:12
show 295:12 301:23
309:16,18 335:22
344:24 345:1 359:14
377:25 387:20
showed 359:22
365:9 402:13
shown 301:25 319:15
359:24
shows 328:9 330:13
sign 382:2,9
Signature 405:3
signing 403:22,24
signs 376:8,20 377:7,
9,10,12,20,25 378:6
379:2,14,17,20,24,25
380:3,4,8,20,24 381:1,5
391:19,23 392:7,11,14
393:12
similar 324:2
simple 315:10
simply 297:4 356:16
357:1
single 328:9 330:12,
16 331:11 390:2
402:14,15
sir 298:15,23 323:23
363:4 385:2 389:16
403:1,6,8,22
sit 305:24
sitting 381:15
situation 396:18
size 361:1
skip 315:24
skipping 396:7
slave 317:14
slides 347:25
slow 298:11 336:9
367:2 388:7
slowing 314:13
small 393:6,10

Smith 341:4,7 374:15
SMS 334:3
SMSS 334:2
snitch 399:15
social 360:22,24
361:5 362:2 368:20
388:14 394:8
somebody's 322:9
sort 323:6
sounds 295:19
source 319:21 342:9,
10 343:7
speak 295:24 296:1
396:25
speaking 296:23
special 382:10
403:10
specific 340:15
348:16,18 387:19,22
specifically 395:23
speculation 320:3
328:2,16 337:8 345:15
353:15
speech 324:18
399:14
speed 367:3
spellings 404:15,20
spend 340:2 396:15
spending 339:7
spent 339:5 340:5
spoke 357:23 358:4
spoken 353:19
spreading 350:19
staged 314:12
stalked 313:19
314:15 344:20
stalking 314:4
379:22
stamp 396:7
Stan 391:8

stand 295:7 298:6 337:18 368:21	steps 339:25	supposedly 335:22	things 297:5 308:22, 25 324:17 338:3 339:21 341:5 344:22,25 348:24 367:11,14 374:13 385:15 397:21 401:4
stands 348:1	sticker 324:25 325:1, 2,5	surrounding 391:21 392:9	thinks 360:25
Stanley 390:24 391:3,4,10	stop 367:22 370:11,23 371:4 396:8	swear 298:21,24	Thirty 368:15,16 403:2
stapled 325:25	stopped 339:6	sweet 317:12	Thirty-one 370:19
start 295:22 355:14	straight 328:19	switch 373:15	thought 300:20,22 375:19 400:15
started 353:4 367:10	stranger 341:19	sworn 298:17 299:5	thousands 338:15 339:20 348:25
starts 364:1 395:14	stream 363:1 393:24 394:13 396:22 397:9	system 383:23	threat 371:25 402:15
Stat 371:17 372:4	streams 398:20	T	threatened 364:13
state 328:12 394:21	strike 302:13 308:1 310:23 316:7 323:7 333:9 346:14 349:10 352:19 361:12 366:14 369:5 371:13	table 295:10	threatening 385:20 386:6
stated 303:4,7 316:15 327:4 333:2 351:2 357:24 359:2 360:23 364:15 368:2 379:23 383:23	stroke 300:8	talent 332:24	threats 359:3
statement 299:18 300:3,5 304:1 306:10, 17,23,25 310:20,25 311:1,6,11,15,20,24 313:13 324:14,19 326:5 329:8 335:23 336:12,20 337:20 342:5 344:5 346:20 347:9 348:16,19 351:4,16 359:13 368:8, 10 371:6,10 387:19,22 388:16	stuck 379:17 400:19	talking 345:17 384:23,24 396:8,20	three-page 325:25
statements 300:18 301:3,5,7,11,13,15,21, 24 302:7,16,19 303:20 311:7,13,21 313:11 317:7,8 337:4 340:10 360:21 361:4,17 362:15 363:21 366:2 370:21,22 371:1,3,8 380:20 388:6, 12 400:8 402:13,14	studies 378:12,14, 19,20,23	talks 341:20 387:7	tie 301:20
states 297:15 324:15 326:6 395:22	stuff 309:18 324:16 339:6 345:18	tall 368:21	till 360:25
stating 317:17 329:10 341:10,13 350:20	stupid 348:5	taxpayers' 346:24	time 295:11 299:23 300:16,21 307:15 313:7,9 317:2 323:20 329:20 336:7 349:13,16 352:6 353:2 355:9 356:6 361:8 362:3,18, 22,23 363:25 364:3 366:20 371:16 372:11, 18 378:22 384:11,16 387:24 396:7 402:1
statute 371:22 372:5, 7	succinctly 296:22	telling 323:20 325:12	times 300:14 331:3 346:10 352:13
step 364:12	sucking 329:10	tells 323:19 378:16	title 297:15 375:25
Stephen 377:6,14,15 379:2 380:19	sued 396:12 400:11	terms 381:24 382:3,7, 8 385:9,17,18	today 295:3 298:25 308:7,13 317:4 318:22 321:2 329:22 343:10, 11,12,22 350:12 402:12
	suggests 313:8,9	terrible 341:5	told 364:11 397:17 399:1
	summary 297:14 318:24 319:1,10 353:11 359:7	territory 401:3	Toni 401:23
	summation 402:8	testified 299:5 333:21 339:19	top 312:25 313:3 322:2 326:24 327:14 330:1 349:12,15 352:25
	Supa 324:25 325:2, 13,19	testify 305:25	tortoise 300:11 362:11
	supplementing 384:5	testimony 298:25 318:17 328:8 335:9 336:11,23 345:11 346:13 348:7 381:16 389:11,19,21,23 390:1, 11,14	
	support 308:23 312:2 338:13,24 339:21 340:16,22 371:9,12	text 334:4 396:6 397:12	
	supporters 374:11, 20	texted 334:7	
	supporting 338:17 341:6,8,10 370:23 371:4 382:21	texts 334:9	
		Therese 300:21 377:6,14,15 379:2 380:19	
		thing 342:16 351:4 369:8 401:9	

total 300:11 336:15
totality 302:19 341:1
348:20 368:12 369:8,
12,18,21 370:7
town 300:8 350:19,20
364:7 392:15
toys 359:2,15
traffic 378:18,19,20,
23
transaction 382:9
transcript 403:7
transcribing 397:4
398:21
tremendous 307:15
trespassed 344:20
364:9
trolls 351:23
truck 364:9
true 393:10 398:19
truth 299:1 352:17
turn 298:18 360:17
turned 351:19,24
352:7,12,15,16,17
turtle 314:10
TV 352:11,15,17
tying 301:8
typed 331:25
typewritten 327:13
typo 373:25

U

ugliest 401:9
ugly 348:6
Uh-huh 317:13
347:15 388:3
Umbrella 397:10
unable 377:19
unaltered 332:5
unauthenticated
307:19

unaware 304:7
undermining
312:18
underneath 325:6
344:17
understand 295:10
301:19 307:21 310:25
311:5,19 330:14 339:15
356:19 359:12 364:2
378:3 381:8 386:1
understanding
307:9 311:12 316:8,12
323:8,13 347:17 354:1,
3 357:11
Understood 337:2
385:19
unfavorable 399:24
unidentified 321:6
United 297:15
unprepared 318:21
unquote 368:22,25
unreal 314:12
untrue 314:11,12,15,
16,21 324:20

V

valid 373:1,11
verb 319:15
verbiage 346:12
versus 317:25
video 321:19 322:4
344:16,19,24 345:1,2,4
346:5 365:9,10
videoed 344:23
videos 345:11,17
351:20 352:3,7,12,13,
18 360:24 398:20
viewers 350:18
views 314:3
voice 399:10,16,22
Volume 295:1

W

wait 296:2 323:15
waiting 333:17
351:22
waived 405:3
wanted 342:13 352:2
363:23 367:7,8,24
wasting 346:23
watched 360:24
water 295:8 297:24,25
wear 347:22
web 388:13
week 343:9 382:18,
19,20
West 342:25 343:2
380:25 381:5
Whatnot 381:13,18
382:14,23,24,25 383:3,
16,25 384:7,10,12,15,
21,22 385:8
whoa 380:2
win 396:14,16,17
wise 369:20
withdrawn 311:18
woman 357:7
woman's 326:7
women 316:16 348:6
women's 316:25
word 320:12 329:11,
13 332:3,14 398:12
403:12
words 323:9 330:8
331:19 332:12 336:19
337:21,25 348:10,14
369:10,15,23 370:2,6,9
389:11 391:5
work 333:4,5 336:13,
17,20 337:9,15,22
338:1,4,8 339:12
358:18 378:9

worth 386:18
wow 341:4
wrap 402:4
write 370:20 379:12
393:17
writing 368:2 401:22
written 335:6,8
339:20 355:15 360:2
368:9 375:1 381:23
399:11 401:22
wrong 336:22 359:23
397:4
wrote 338:24 348:24
391:20

Y

year 307:14
years 313:23
yell 391:5
Youtube 314:4
315:14 317:9 324:2
325:13,18 341:11
349:20,24 351:5 352:2,
9 362:13,14 382:23
383:1,4 384:1,2,6,24
385:14,17 394:4,8,11,
13 400:8
Youtuber 327:7
350:18

Z

Zim 376:21 377:6,14,
15 379:1 380:19,24

S

§636(e)(2) 297:15