

IN THE CIRCUIT COURT OF THE
EIGHTH JUDICIAL CIRCUIT, IN
AND FOR LEVY COUNTY, FLORIDA

CASE NO.: 38-2023-DR-000416
DIVISION: Family

IN RE: THE MATTER OF:

LYNETTE PRESTON,

Petitioner,

VS.

JEREMY BRYAN HALES,

Respondent.

_____ /

VIDEO

DEPOSITION OF: JEREMY B. HALES

DATE: Friday, February 16, 2024

TIME: 9:00 a.m. - 11:45 a.m.

PLACE: Levy County Courthouse
355 South Court Street
Bronson, Florida

REPORTED BY: Rhonda D. Mashburn
Court Reporter/Notary Public

1 APPEARANCES:

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18 ALSO PRESENT:

19 Trey Sidenbender, videographer (via Zoom)
 20 Brent Lanier, paralegal, Silverman & Mack

21 I N D E X

22 WITNESS:	PAGE
23 JEREMY B. HALES	
24 Direct Examination by Mr. Silverman	4
25 CERTIFICATE OF OATH	123
CERTIFICATE OF REPORTER	124

1 THE VIDEOGRAPHER: All right. We are now on the
2 record in the matter of Lynette Preston vs. Jeremy
3 Bryan Hales, Case No. 38-2023-DR-000416-DRA. Today's
4 date is two -- February 16th, 2024. The time is 9:00
5 a.m. -- 9:05 a.m. And this is the video recorded
6 deposition of Jeremy Bryan Hales, being taken at Levy
7 County Courthouse, 355 South Court Street, Bronson,
8 Florida, 32621.

9 My name is Trey Sidenbender. I'm the camera
10 operator representing CourtScribes, Inc. The court
11 reporter is Rhonda Mashburn with Scribe Associates.
12 Will all counsel please introduce themselves.

13 MR. SHOCHET: Randy Shochet, Shochet Law Group
14 in Trenton, Florida, on behalf of Jeremy Hales.

15 MS. INKELES: Doreen Inkeles, Shochet Law Group,
16 co-counsel.

17 MR. SILVERMAN: Joshua Silverman on behalf of
18 the petitioner. And my paralegal, Brent Lanier, is
19 present as well.

20 THE VIDEOGRAPHER: Thank you. Can the court
21 reporter please swear in the witness?

22 COURT REPORTER: Would you raise your right hand,
23 please. Do you solemnly swear the testimony you will
24 give in this case will be the truth, the whole truth,
25 and nothing but the truth, so help you God?

1 THE WITNESS: I do.

2 THEREUPON,

3 JEREMY B. HALES

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

6 DIRECT EXAMINATION

7 BY MR. SILVERMAN:

8 Q. Please state your full name, sir.

9 A. Jeremy Bryan Hales.

10 Q. Mr. Hales, what is your date of birth?

11 A. 3/30/77.

12 Q. Mr. Hales, what is your current address?

13 A. Can you clarify that question, please?

14 Q. Well, how many addresses do you have?

15 A. Many.

16 Q. All right. Before we get into the substantive
17 matters of this deposition, let me start with a few
18 ground rules. Have you ever given a deposition before?

19 A. No.

20 Q. All right. So I'm going to be asking you
21 questions today. I'm going to ask you to answer those
22 questions to the best of your ability.

23 I need you to listen to every question I ask and
24 to answer it out loud with some type of verbal answer.

25 A nod of the head or using some type of verbal -- not

1 verbal -- but sound like uh-huh is not going to work
2 because the court reporter can't take that down
3 properly. Understand that?

4 A. Yes.

5 Q. If you don't understand a question I'm asking or
6 you think I'm being unclear, it's perfectly okay to ask
7 me to clarify or restate the question, very similarly to
8 what you just did with the address question. If you
9 answer a question without seeking clarification, the
10 assumption is going to be that you understood the
11 question. Is that clear?

12 A. Yes.

13 Q. Lastly, you may at various times throughout this
14 deposition hear your attorney make depositions -- or
15 make objections. I'm sorry. And do you understand that
16 you must still answer the questions even with objections
17 being made on the record?

18 MR. SHOCHET: Unless I tell you not to answer a
19 question, which I don't think will happen. But if he
20 asks you questions that I think are privileged, then
21 I will say don't answer. I don't expect that to
22 happen.

23 If I say objection or Ms. Inkeles says --
24 usually we say form. That just means that I have an
25 objection to the form of the question. So I'll say

1 you can go ahead and answer.

2 Q. So do you understand that?

3 A. With the clarification of Mr. Shochet, yes.

4 Q. All right. So let us return to the questions.

5 I asked you about your address and you said that you
6 have multiple addresses. What is the address that you
7 consider to be your primary residence?

8 A. 2436 West Streetsboro Road, Peninsula, Ohio.

9 Q. That's in Summit County, Ohio?

10 A. Correct, yes.

11 Q. How long have you lived at that address?

12 A. Oh, coming up on I think two years now, just
13 under two years.

14 Q. Do you own -- is that a home or is it an
15 apartment? What type of residence is it?

16 A. That is a home.

17 Q. Do you own that home?

18 A. Yes.

19 Q. Do you own that in your sole name?

20 A. Yes.

21 Q. Okay. And where did you live -- what was your
22 primary residence prior to the Streetsboro Road address?

23 A. 2447 Friar Tuck Circle, Wooster, Ohio.

24 Q. How long did you live there?

25 A. Eight years, I believe.

1 Q. Do you have any other -- or do you own any other
2 property in the state of Ohio?

3 A. Yes.

4 Q. What property in the state of Ohio do you own
5 other than the Streetsboro Road address that you have
6 mentioned?

7 A. 2247 Friar Tuck Circle.

8 Q. You still own that property?

9 A. Yes.

10 Q. And is that rented out?

11 A. Technically, no.

12 Q. When you say technically, no, what do you mean
13 by that?

14 A. I mean, it's given as compensation to my
15 employees. I pay them a salary plus housing.

16 Q. Your employees for what business?

17 A. For Elephant Shoe, LLC.

18 Q. Are there any other properties in the state of
19 Ohio that you own?

20 A. Yes.

21 Q. What are they?

22 A. 120 East Highland Avenue.

23 Q. And where is that located?

24 A. Wooster, Ohio.

25 Q. What is the nature of that property?

1 A. That is a rental.

2 Q. And it's apparently rented out?

3 A. Yes.

4 Q. Who lives there?

5 A. Many different individuals. It's a quad.

6 Q. A quad?

7 A. (Nods head affirmatively.)

8 Q. Are there any other properties that you own in
9 the state of Ohio?

10 A. Yes, 820 --

11 Q. Proceed.

12 A. 825 Boston Avenue.

13 Q. Is that also in Wooster?

14 A. No, Elyria.

15 Q. Where is that?

16 A. Elyria.

17 Q. Spell that, please.

18 A. E-l-y-r-i-a.

19 Q. And is that a home?

20 A. Yes.

21 Q. Who lives there?

22 A. Rental.

23 Q. Is it currently rented?

24 A. Yes.

25 Q. What is the tenant's name?

1 A. Two tenants.

2 Q. What are their names?

3 A. I'm trying to think. Mandy and Joe.

4 Q. What are their last names?

5 A. Dedrick and Charley.

6 Q. So Mandy Dedrick?

7 A. Yes.

8 Q. And Joe Charley?

9 A. Yes.

10 Q. All right. Proceed with the properties that you
11 own in the state of Ohio. Any others?

12 A. No.

13 Q. Do you own property in the state of Florida?

14 A. Yes.

15 Q. How many parcels of real property do you own in
16 the state of Florida?

17 A. Multiple. I'm not sure exactly how many parcels.

18 Q. What county or counties are those parcels located
19 in?

20 A. Levy.

21 Q. Do you have a residence in Levy County?

22 A. Yes.

23 Q. What is the address of that residence?

24 A. 310 North Otter Creek Avenue.

25 Q. What is the nature of that real property?

1 Describe it for me, please.

2 A. Clarify your question, please.

3 Q. Is it a home? Is it -- is there a mobile home?

4 Is it a free-standing home?

5 A. It's a residential home.

6 Q. Residential home. Are there any other structures
7 on the property?

8 A. Yes.

9 Q. What structures are on the property?

10 A. Shed.

11 Q. How many acres is the property?

12 A. Seventy plus.

13 Q. Well, 70 plus, what number above 70 is it?

14 A. I'd have to look at the assessor's website to
15 come up with that, 70 point something-something. I
16 don't remember.

17 Q. Is it more or fewer than 80?

18 A. It's fewer than 80.

19 Q. So between 70 and 80?

20 A. It's 70 dot something-something. It's between
21 70 and 71 acres.

22 Q. And in whose name is that property titled?

23 A. That would be in my LLC, Hang Your Hat, as are
24 all the other properties.

25 Q. All of your properties in Florida or in Ohio or

1 both are --

2 A. Both.

3 Q. Okay. Hang Your Hat, LLC?

4 A. Hang Your Hat Homes, LLC.

5 Q. In what state is that LLC incorporated?

6 A. Ohio.

7 Q. Who are the owners of that LLC?

8 A. Myself, sole proprietor.

9 Q. And what is the zoning on the 310 North Otter
10 Creek Avenue property?

11 A. Residential.

12 Q. Are the 70 acres completely cleared?

13 A. No.

14 Q. How much of the 70 acres have been cleared?

15 A. None.

16 Q. Describe the home on the property.

17 A. Old hunting cabin converted into a home where
18 eight children were raised in Levy County. And I
19 wouldn't call it much of a home. You can put your
20 fingers through the wall.

21 Q. And is that where you reside when you are in Levy
22 County?

23 A. Yes.

24 Q. How long do you spend in Levy County as opposed
25 to at your primary residence in Ohio?

1 A. Six to seven months, give or take.

2 Q. Is it -- for lack of a better phrase -- a
3 snowbird thing where you're here during the winter
4 months?

5 A. Snowbirding.

6 Q. How long have you owned that property or has your
7 LLC owned the property at 310 North Otter Creek?

8 A. Since 2021.

9 Q. Is that the first parcel of property that you
10 bought in the state of Florida?

11 A. Yes.

12 Q. And you indicated that you own other properties
13 in Levy County. How many other parcels of property do
14 you own in Levy County?

15 A. Two. May I be excused for one second?

16 MR. SHOCHET: Do you need a break?

17 THE WITNESS: No. I just need to silence -- I
18 heard my notification. I silenced it beforehand,
19 but -- unless it wasn't my phone.

20 MR. SHOCHET: Okay.

21 MR. SILVERMAN: That's fine.

22 THE WITNESS: Are you okay with me -- okay. I
23 just want to make sure it's absolutely silenced.

24 MR. SHOCHET: Okay. I'm going to get ready and
25 I need for Inkeles to --

1 THE WITNESS: My apologies.

2 MR. SHOCHET: I'll be back.

3 MR. SILVERMAN: Let the record reflect Mr.
4 Shochet has stepped out to attend a hearing,
5 indicated he'll be returning promptly.

6 Q. All right. So you have two other parcels of
7 property in Levy County. What are the addresses of
8 those parcels?

9 A. One of the parcels, I don't know the address.
10 I'd have to look on the website. And the other parcel
11 would be 351 FL-24 in Otter Creek.

12 Q. The parcel to which you do not know the address
13 offhand, where is that in relation to the 310 North
14 Otter Creek address?

15 A. Touches it, 310 surrounds it.

16 Q. Completely surrounds it?

17 A. Except on one side, except on the north side.
18 And that is the only parcel that's actually in my name,
19 Jeremy Hales, versus --

20 Q. What are the last four digits of your social
21 security number?

22 A. 6935.

23 Q. Have you ever been arrested?

24 A. Yes.

25 Q. On how many occasions?

1 A. Once.

2 Q. Where were you arrested?

3 A. Wooster, Ohio.

4 Q. And what county is Wooster in?

5 A. That would be Wayne County.

6 Q. And what were you arrested for?

7 A. That I don't remember.

8 Q. When were you arrested?

9 A. That I don't remember either.

10 Q. Can you approximate it for me?

11 A. I would say seven, eight years ago when I lived
12 in Wooster.

13 Q. Where were you arrested in Wooster?

14 A. At my home.

15 Q. Who else was present other than the police at the
16 time you were arrested?

17 A. Nobody.

18 Q. And can you tell me -- if you don't remember the
19 specific allegation for which you were arrested or
20 charged, can you tell me what the general nature of it
21 was?

22 A. Disorderly conduct.

23 Q. And can you tell me generally what the allegation
24 against you was? Arrested for being disorderly how?

25 A. A girlfriend, who is no longer a girlfriend,

1 asked me to come and visit her at her new apartment
2 where she was staying. She was renting a room from
3 an individual. The tenant, who was sweet on the
4 girlfriend, then called the police, made allegations,
5 and then the police arrested for disorderly conduct and
6 charges were dropped.

7 Q. What allegations did the tenant make?

8 A. Again, I don't recall all the specifics from
9 that. I apologize. It was a long time ago.

10 Q. Tell me as best as you can recall even if you are
11 generalizing.

12 A. Disorderly conduct is what I can come up with.

13 Q. Were there any allegations that drugs or alcohol
14 were involved?

15 A. No.

16 Q. What was the girlfriend's name -- or what is the
17 girlfriend's name?

18 A. Holly Kelly.

19 Q. Is it Holly with a Y?

20 A. Yes.

21 Q. And Kelly with two E's or one?

22 A. One.

23 Q. And do you know where Ms. Kelly currently
24 resides?

25 A. No.

1 Q. Do you know her current phone number?

2 A. No.

3 Q. And what was the tenant's name, do you know, the
4 one who made the allegations against you?

5 A. I don't remember that either.

6 Q. How long did you spend in a jail or correctional
7 facility after you were arrested?

8 A. One night.

9 Q. You are currently in a relationship?

10 A. Yes.

11 Q. And with whom are you in a relationship?

12 A. Martha George Rizk.

13 Q. Spell the last name, please.

14 A. R-i-z-k.

15 Q. How long have you and Ms. Rizk been in a
16 relationship?

17 A. Over five years.

18 Q. Are you married?

19 A. No.

20 Q. Do you have any children, Mr. Hales?

21 A. Yes.

22 Q. How many children do you have?

23 A. Three.

24 Q. What are their ages?

25 A. Twenty-four, 18, 14.

1 Q. And are all those children with the same mother?

2 A. Yes.

3 Q. What is her name?

4 A. Sara.

5 Q. With an H?

6 A. Yes. Well, please clarify, first name or last
7 name.

8 Q. Well, you haven't given me the last name yet,
9 so --

10 A. I apologize. I expected it would be known since
11 it was marriage.

12 Q. So with respect to Sara, does that have an H or
13 not?

14 A. No.

15 Q. And does she go by the last name Hales?

16 A. Yes.

17 Q. Where does she reside?

18 A. That I don't know either. I don't know her
19 specific address.

20 Q. Okay. Do you know what city she lives in?

21 A. Yes.

22 Q. What city does she live in?

23 A. Millersburg.

24 Q. Millersburg?

25 A. Uh-huh.

1 Q. Is that M-i-l-l-e-r-s-b-u-r-g?

2 A. Yes.

3 Q. And what state is that in?

4 A. Ohio.

5 Q. When did you and Mrs. Hales get divorced?

6 A. 2014.

7 Q. What is the custody or time-sharing arrangement
8 you have with your one minor child?

9 A. She can do whatever she wants.

10 Q. Is that -- is there a formal custody order and a
11 court order, such as a divorce judgment?

12 A. Yeah, every other weekend -- standard in Ohio,
13 every other weekend, weeks during the summer. She can
14 initiate contact whenever she wants.

15 Q. Do you exercise any time-sharing with your
16 14-year-old while you are here in Levy County?

17 A. No.

18 Q. Do you have a child support obligation?

19 A. Yes.

20 Q. What is your current child support obligation?

21 A. I don't know what that is off the top of my head
22 either.

23 Q. How is your child support obligation paid?

24 A. Per a check.

25 Q. A check written by whom?

1 A. Me.

2 Q. And you pay it on a monthly basis?

3 A. Yes.

4 Q. Can you tell me approximately what that child
5 support obligation is?

6 A. Yes. It's --

7 Q. Proceed.

8 A. (Continuing) -- roughly 1200 to 1300, somewhere
9 in there, a month.

10 Q. Are you current on your child support obligation?

11 A. Yes.

12 Q. Is there -- are there legal proceedings in the
13 state of Ohio which involve my client, Lynette Preston?

14 A. Yes.

15 Q. Can you please describe to the best of your
16 understanding what legal proceedings are going on in
17 Ohio concerning Ms. Preston?

18 A. Violation of civil protection orders.

19 Q. When you say civil protection orders, that is
20 plural. How many orders are there?

21 A. There is one on Lynette Preston and there is one
22 on John Cook.

23 Q. And who is the petitioner or are the petitioners
24 in those civil protection order actions?

25 A. Myself, Martha Rizk.

1 Q. To the best of your knowledge, has Lynette
2 Preston ever been to the state of Ohio?

3 A. I do not know.

4 Q. Do you have any information that she's ever
5 stepped foot in the state of Ohio?

6 A. I do not know.

7 Q. Well, you don't know if you have information
8 that she stepped foot in Ohio? Either you have that
9 information or you do not. So what I'm asking you --
10 I'm not asking you to give me an absolute whether she's
11 been to Ohio. I'm asking you based upon everything that
12 you know, has she been to Ohio?

13 A. Based on everything I know, I do not know if
14 she's ever been to Ohio.

15 Q. Do you have any information which would indicate
16 to you that John Cook has ever been to Ohio?

17 A. Based on everything I know, I do not know.

18 Q. Have you ever been involved in legal proceedings
19 involving what might be called a restraining order, an
20 injunction, a civil protection order or anything similar
21 involving any individual other than Lynette Preston or
22 John Cook?

23 A. Yeah, Sara Hales.

24 Q. That would be your former wife?

25 A. Ex-wife.

1 Q. And did she seek the protection order against
2 you?

3 A. No. It's standard in every divorce in the state
4 of Ohio.

5 Q. And tell me about that civil protection order.
6 What is your understanding of what it says?

7 A. We both are placed under restraining orders. We
8 can't spend any money without the other's approval. We
9 can't make any decisions without the other's approval
10 until the divorce is finalized.

11 Q. So you're no longer subject to that civil order?

12 A. Correct.

13 Q. Have you ever been involved in any other
14 proceedings involving a -- some type of restraining
15 order, injunction, or civil protection order?

16 A. Yes.

17 Q. And what are those?

18 A. So ex-girlfriend, Crystal Channing.

19 Q. Is that Crystal with a C or a K?

20 A. C.

21 Q. Where does Ms. Channing reside?

22 A. I do not know.

23 Q. Where was the last place you knew her to reside?

24 A. Ohio.

25 Q. Where in Ohio?

1 A. Again, I do not know. The last place I knew was
2 with me at 2247 Friar Tuck.

3 Q. And when was that?

4 A. Again, I do not know. Eight years ago?

5 Q. And who was the petitioner or plaintiff in that
6 action?

7 A. Crystal Channing was.

8 Q. What did she allege?

9 A. I do not remember.

10 Q. In what county did this proceeding take place?

11 A. That I don't remember either.

12 Q. I think you earlier told me that -- well, you
13 said it took place at your home. Was it in Wooster?
14 And Wooster's in what county?

15 A. No, it wasn't in Wooster.

16 Q. Which address were you living with her at?

17 A. 2247.

18 Q. 2247. I don't think you told me about that
19 property. What is that?

20 A. That's the first property you asked me about.

21 Q. I put 2436, the Streetsboro Road address. Did I
22 write that wrong?

23 A. No. You're good on that one. 2247 is Friar
24 Tuck.

25 Q. Okay. I did type that wrong. I wrote 2427. And

1 so you resided there with her. How long did you reside
2 with Ms. Channing?

3 A. Approximately two to three months.

4 Q. Did she allege that you committed any kind of
5 domestic violence upon her?

6 A. No.

7 Q. And was her -- did she file a petition for a
8 restraining order or a civil protection order against
9 you?

10 A. Yes, she did.

11 Q. Was that granted by the court?

12 A. Yeah. We agreed to stay away from each other for
13 one year.

14 Q. When you say you agreed to stay away from each
15 other, are you telling me that there were mutual civil
16 protection orders imposed barring you from contacting
17 her and her from contacting you?

18 A. I don't recall, because it was so long ago,
19 exactly how it went. So there was no court proceeding.
20 There was an agreement.

21 Q. Do you have copies of any paperwork regarding
22 that agreement?

23 A. Nothing.

24 Q. Your attorney -- after I noticed this deposition
25 on behalf of my client, your attorney filed a cross-

1 notice of deposition. The cross-notice of deposition
2 commanded you to bring with you today documents
3 described in the notice. Did you bring any of those
4 documents with you today?

5 A. I did not receive any notification of bringing
6 any documents.

7 Q. Are you aware that your attorney, when he cross-
8 noticed this deposition for the purpose of making it a
9 video deposition, included a lengthy recitation of
10 documents that you were ordered to bring?

11 A. No, I am not aware.

12 Q. Did you review the Notice of Taking Deposition
13 that your attorney filed on your behalf?

14 A. No, I did not.

15 Q. For the record, the Notice of Taking Deposition
16 cross-notice filed on January 31st, 2024, 10:05 a.m.,
17 filing number 190992637, reads as follows: "The
18 deponent is to have with him or her at the time of
19 the deposition the following materials: A complete
20 and legible copy of all documents, including, without
21 limitation, video recordings, audio recording,
22 photographs, e-mails, text messages, letters,
23 facsimiles, either directly or indirectly referencing
24 and/or relating to the claims made in this case by the
25 petitioner against the respondent." And there is a

1 lengthy definition of what your attorney considers the
2 word document to mean.

3 And so to be clear, you have not brought any
4 documents responsive to that notice filed by your own
5 attorney?

6 A. No, I have not.

7 Q. Are you in possession of any such documents? And
8 I don't mean immediately with you right now, but I mean
9 in general.

10 A. Yes.

11 Q. Describe for me the documents that you have in
12 your possession or within your control.

13 A. Can you clarify the question in regards to what
14 you mean by the documents?

15 Q. Well, I will read to you your attorney's
16 definition of documents or document from the notice.
17 "The term document or documents shall be construed
18 extremely broadly to mean all intangible things of every
19 nature that contain information, including, but not
20 limited to, correspondence, communications, writings
21 of every kind, drawings, graphs, charts, agreements,
22 contracts, analyses, appointment records, audio
23 recordings, whether transcribed or not, bills, books,
24 books of account, calendars, personal and business,
25 checks, computer cards, tapes, disks, diskettes,

1 computer printouts, computer programs, diaries,
2 diagrams, drafts, records, financial statements, forms,
3 handbooks, reports, indexes" -- I assume that's a
4 typographical error -- "instruction sheets, manuals,
5 maps, memoranda, minutes, notes, whether handwritten
6 or otherwise, opinions, permits, photographs, plans,
7 proofs, periodicals or other publications, receipts,
8 recordings, reports, service manuals, sketches,
9 specifications, studies, summaries, tags, tapes,
10 telefaxes, telegrams, telephone messages and message
11 slips, telexes, other telecommunication materials, video
12 recordings, and any other data compilation from which
13 information can be obtained or translated through
14 detection devices or otherwise into a reasonably usable
15 form, including all such items in the possession,
16 custody or control of any of your directors, employees
17 or agents, wherever located.

18 "The terms relating, relating to, referring,
19 and referring to shall mean making a statement about
20 discussing, describing, reflecting, referencing,
21 concerning, constituting, identifying, dealing with,
22 consisting of, containing, interpreting, summarizing,
23 establishing, comprising, listing, evidencing,
24 substantiating, involving, or in any way pertaining to
25 the subject matter in whole or in part."

1 Did you understand that definition that I just
2 read to you?

3 A. Yes.

4 Q. And with that understanding of the definition
5 that I read to you, which is in your attorney's own
6 words, taken from the notice that he filed, are you in
7 possession of any such documents or records as defined
8 within the definition contained in the attorney's notes?

9 A. So the portion that I did not understand and I
10 need clarification for is you said something about
11 petitioner or respondent or something in regards there.
12 The information in regards to -- can you fill in the
13 blank? The information in regards to like her claims
14 or --

15 Q. Again, reading from the definition within the
16 notice that your attorney drafted and filed, "A complete
17 and legible copy of all documents" -- and then we're
18 going to move forward -- "either directly or indirectly
19 referencing and/or relating to the claims made in this
20 case by the petitioner" --

21 A. Okay.

22 Q. (Continuing) -- "against the respondent."

23 A. Now I understand. Yes. I have text messages.
24 I have screen shots, Facebook posts, thousands upon
25 thousands. I have video. I have audio files. The list

1 could go on and on.

2 Q. Why did you not bring any of those materials with
3 you today?

4 A. As stated before, I did not know that they were
5 requested.

6 Q. How many text messages are you in possession of
7 relating -- or that are responsive to that demand within
8 the deposition notice?

9 A. I do not know the number.

10 Q. Who are the text messages from?

11 A. There are text messages from multiple residents
12 of Otter Creek. So there would be Therese Granger,
13 Deborah Thomas.

14 Q. Proceed.

15 A. I'm thinking. There may be more, but I'm not
16 sure at this point.

17 Q. Are you in possession of text messages sent by
18 my client?

19 A. Oh, correct, yes, text messages sent by your
20 client, Lynette Preston.

21 Q. How did you obtain those text messages?

22 A. She text me.

23 Q. Are you in possession of any text messages
24 purportedly from Ms. Preston that were not specifically
25 addressed or directed to you?

1 A. Yes.

2 Q. And to whom are those text messages addressed or
3 directed?

4 A. To Therese Granger, Deborah Thompson, and
5 potentially others.

6 Q. How did you obtain the text messages that Ms.
7 Preston allegedly sent to Ms. Granger?

8 A. They were given.

9 Q. By whom?

10 A. Therese Granger.

11 Q. Same question for the text messages allegedly
12 sent to Ms. Thomas. How did you obtain those?

13 A. They were given.

14 Q. By Ms. Thomas?

15 A. Yes.

16 Q. Mr. Hales, have you recently posted on YouTube at
17 least two videos in which you discuss at length the most
18 recent hearing held in this case?

19 A. Yes.

20 Q. During the course of one or both of those videos,
21 did you make an allegation or at least an insinuation
22 that Judge DeThomasis and I, on behalf of my client, had
23 colluded outside of court to your disadvantage?

24 A. Can you be more specific?

25 Q. Do you recall a discussion during the last

1 hearing regarding whether your attorney had properly
2 noticed Ms. Preston's deposition to be a video
3 deposition?

4 A. Can you repeat that, please?

5 Q. Do you recall a discussion during the last
6 hearing -- I believe it was on January 23rd -- in which
7 there was a discussion with the court about whether your
8 attorney had properly noticed --

9 A. Yes.

10 Q. (Continuing) -- Ms. Preston's deposition to be a
11 video deposition?

12 A. Yes.

13 Q. And do you recall that there was a rule
14 discussed, Rule 12.301(d) of the rules of procedure --
15 I'm sorry -- (b)(4) of the rules of procedure?

16 A. I don't recall the specifics.

17 Q. Okay. Do you recall Judge DeThomasis indicating
18 that he had a copy of the rule with him on the bench?

19 A. I don't recall that either.

20 Q. Okay. Do you recall a point in the hearing where
21 I brought up the issue of the rule?

22 A. I don't recall that either. I don't recall the
23 specifics, though I have posted a video of the actual
24 hearings.

25 Q. Do you recall in one of those videos that you

1 posted, with video of the January 23rd hearing, making
2 a statement to the effect that if somebody -- if your
3 viewers didn't believe that Judge DeThomasis and I had
4 arranged in advance to bring that up, a discussion of
5 the rule, that they would be fools or you have something
6 to sell them, something sarcastically, indicating that
7 you believe that Judge DeThomasis and I had colluded
8 outside of court?

9 A. I don't recall the exact specifics.

10 Q. Would looking at that video help refresh your
11 recollection?

12 A. Yes.

13 MR. SILVERMAN: All right. You may step out to
14 pull up that video, please.

15 Q. Do you believe that Judge DeThomasis and I have
16 colluded outside of court?

17 A. I believe that there is something going on that
18 I don't understand.

19 Q. Returning you to the question I asked you, do
20 you believe that Judge DeThomasis and I have colluded
21 outside of court?

22 A. I believe there is potential that there is
23 collusion and there is corruption and there's potential
24 of anything.

25 Q. Returning you to the question I asked you

1 specifically, do you believe the Judge DeThomasis and I
2 have colluded outside of court regarding this specific
3 case to somehow prejudice or disadvantage you or your
4 legal rights?

5 MS. INKELES: Objection, asked and answered.
6 You can answer.

7 A. I don't know if you have or not.

8 Q. What would be the facts upon which you rely to
9 even suspect that such a thing has happened?

10 A. Facts would be the aspects of what is happening
11 within the court system itself and recognizing that
12 something seems extremely off.

13 Q. What is it that seems extremely off to you?

14 A. The aspect that the first amendment is being
15 attacked, the aspect that free press is being attacked,
16 the aspect that constitutional law is not being upheld,
17 but it's actually being undermined. I think that's
18 foundational enough in itself.

19 Q. What does the word foundational mean to you?

20 A. Foundation, this building does not stand unless
21 it has a strong foundation. If that foundation is
22 faulty, this building falls. And so our foundational
23 guidelines -- our constitution is foundational for our
24 laws within the United States as citizens. So it is
25 the stronghold for where everything else flows from and

1 stands on.

2 Q. Would it be a fair statement, Mr. Hales, that you
3 disagree with many of the rulings that Judge DeThomasis
4 has made in this case?

5 A. Can you be specific on which rulings?

6 Q. No, sir. My question is more general. Do you
7 disagree with the rulings that the judge has made in
8 this case?

9 A. There are rulings that I have disagreed with.

10 Q. Would you say there are multiple rulings with
11 which you have disagreed?

12 A. Yes. There's more than one.

13 Q. Did the judge make rulings in this case with
14 which you disagreed prior to my appearance in the case
15 in January of this year?

16 A. Yes.

17 Q. And the judge in your view has continued to make
18 rulings with which you disagree?

19 A. Yes.

20 Q. Returning to the question I earlier asked you,
21 why do you believe that the judge and I have colluded
22 improperly in this case?

23 MS. INKELES: Objection to the form. You can
24 answer.

25 A. Based on my observations of how things are going

1 within the court.

2 Q. Please be more specific.

3 A. It seems like something is really, really off.

4 The foundational -- the foundational constitutional
5 laws, the first amendment, free press are being attacked
6 and undermined.

7 Q. What specific observations have you made that
8 form the basis for your opinion?

9 A. I cannot give you specifics.

10 Q. Just a moment ago you answered my question that
11 based upon observations you've made in court, you have
12 a belief that the judge and I are colluding. I want to
13 know from you, if you would, please, sir, what those
14 observations are. Is it your testimony that you do
15 not -- you cannot describe those observations?

16 MS. INKELES: Objection to form. You can answer.

17 A. It's my testimony that I can't give specifics at
18 this point in time.

19 Q. Okay. Do you believe that Judge DeThomasis and I
20 have a relationship --

21 A. Yes.

22 Q. (Continuing) -- that is improper?

23 A. I believe that based on Judge DeThomasis being a
24 part of your divorce case, I believe based on your
25 close friendship with Judge DeThomasis, that there is

1 an improper relationship there.

2 Q. When you say that Judge DeThomasis is part of my
3 divorce case, what do you mean by that?

4 A. Being that he was the judge in your divorce case.

5 Q. And why would that have any bearing on your case
6 whatsoever?

7 MS. INKELES: Objection to form.

8 Q. In your view, why would it have any bearing on
9 your divorce case?

10 A. It's just my view.

11 Q. Please explain your view.

12 A. It's my personal preference -- it's my personal
13 view that it seems inappropriate.

14 Q. Why does it seem inappropriate?

15 MS. INKELES: Objection to form.

16 Q. In your -- I'm asking why in your opinion you
17 believe it's inappropriate.

18 A. That's my belief system.

19 Q. I'm asking you to explain your belief to me, sir.

20 A. My belief is that it's inappropriate.

21 Q. You stated that Judge DeThomasis and I have a
22 relationship outside of court?

23 A. Yes.

24 Q. On what do you base that statement?

25 A. Based off of different Googlings, based off of

1 different things that I've seen online, based off of
2 information that I've heard from other residents in Levy
3 County, and it would appear as though you have a close
4 relationship.

5 Q. All right. Let's take those one at a time. You
6 said based on Googling. What did you find from your
7 Google searches that would indicate to you that I have
8 a personal relationship with Judge DeThomasis outside
9 the practice of law?

10 A. Different cases.

11 Q. And please describe for me what you learned about
12 all those cases.

13 A. I can't describe all of that right now. There's
14 too much information. I can't give specifics with it.

15 Q. All right.

16 A. I apologize I don't have anything in front of me.

17 Q. Describe, if you would, please, generally what
18 you learned from that research.

19 A. Again, I can't. I apologize.

20 Q. Can you name a single case?

21 A. No, not off the top of my head.

22 Q. Can you name a single factual scenario?

23 A. Not off the top of my head.

24 Q. You indicated that you reviewed various cases
25 online. Please tell me which cases you reviewed online.

1 A. Particularly your divorce case. I can give
2 specifics with that.

3 Q. All right. Let's hear it.

4 A. I reviewed it.

5 Q. Okay. And what did you learn from my divorce
6 case?

7 A. I feel as though it's inappropriate for Judge
8 DeThomasis to stand as the judge and for you to be the
9 defendant's lawyer. It seems as though there is a --
10 to me it seems as though there's an inappropriateness in
11 the courtroom.

12 Q. Have you filed to disqualify me from representing
13 Ms. Preston as a result of that?

14 A. No, I have not.

15 Q. Do you intend to do so?

16 MS. INKELES: Objection to form. You can answer.

17 Q. Do you intend to do so?

18 A. It may be an option.

19 Q. You indicated that you have spoken to -- I think
20 you said people around Levy County that have told you
21 things about a relationship I may have with Judge
22 DeThomasis. With whom have you spoken?

23 A. I can't answer that specifically. I get
24 communications sent to me -- thousands of pieces of
25 communications sent to me on a daily basis through

1 e-mails, messages, and I don't even know who sends me
2 what, whether they send me a link, they say this, they
3 say that. So to identify them right now, I can't. I
4 don't have the information in front of me.

5 Q. Are you still in possession of all of those
6 records and items of information that have been sent to
7 you?

8 A. No. Typically they get deleted right after I
9 read them.

10 Q. Would you agree that any allegations that you
11 might make pertaining to a relationship I may have with
12 Judge DeThomasis may have bearing on this case?

13 A. Can you rephrase that, please?

14 Q. Do you think the issue or information about
15 whether I have a personal relationship with Judge
16 DeThomasis outside of court and the legal system might
17 have bearing on this case?

18 A. Can you rephrase it again, please?

19 Q. Do you believe that the question of whether I
20 have a relationship with Judge DeThomasis outside of the
21 legal system has any bearing on this case?

22 A. I believe it can show bias in the case.

23 Q. And is it your testimony, sir, that you received
24 information regarding that issue and have subsequently
25 deleted it?

1 A. Yeah. I get messages all the time from people.

2 Q. As you sit here today, Mr. Hales, making
3 allegations concerning potential professional, unethical
4 improprieties regarding a circuit judge and a member of
5 the Florida Bar, is it your testimony that you cannot
6 remember the name of one individual with whom you have
7 spoken or corresponded or received information from
8 regarding any facts that you may base that opinion on?

9 MS. INKELES: Objection to form. Go ahead. You
10 just have to take a breath.

11 A. No. I don't have that information in front of
12 me.

13 Q. The same question as to your ability to identify
14 a single online resource through Google or otherwise
15 that you have reviewed, you cannot identify as you sit
16 here today a single online resource or case or anything
17 else upon which you base your opinion?

18 A. Well, I have identified one, your divorce case.
19 But others, I don't have those in front of me.

20 Q. Tell me what you have reviewed in my divorce
21 case.

22 A. Again, I don't have it in front of me right now.

23 Q. Okay. When you say you reviewed my divorce
24 case, did you review any documents related to my divorce
25 case?

1 A. I reviewed what was online.

2 Q. And what did you learn from that other than the
3 fact that Judge DeThomasis presided over my divorce
4 case?

5 A. I learned that your ex-wife Karen was abusive to
6 your daughter. I learned that your ex-wife Karen was
7 fired. I learned that Judge DeThomasis presided over
8 your divorce case. I learned that charges were dropped
9 on Karen. Other specifics, I don't recall at this
10 moment.

11 Q. Do you consider yourself a journalist?

12 A. I consider everybody a journalist. That would be
13 the first amendment right.

14 Q. Returning you to the question I asked you, sir,
15 do you consider yourself a journalist?

16 A. I consider everybody a journalist, including
17 myself. That would be a first amendment right.

18 Q. What relevance do you believe -- I'm not asking
19 for a legal conclusion. I'm asking just within the
20 general meaning of the word relevance. What relevance
21 do you believe my former wife's legal issues had -- or
22 has with this case specifically?

23 A. I think there's an aspect of -- first of all I
24 want to say that I don't believe any child, any
25 whatsoever, should be abused. And so regardless of

1 the situation in your own life, I'm thrilled that your
2 daughter has received the help that she has, at the same
3 time as you, being wed to the abuser or the accused
4 abuser, must have had some type of knowledge what was
5 going on, again, in my perception of things.

6 And at the same time, here you are representing
7 an individual, Lynette Preston, who carries along with
8 her a lifetime of neglect and abuse of children and that
9 seems to me -- as an independent journalist, that seems
10 to me that something's off there.

11 Q. What does that mean, something's off?

12 A. Well, that seems to me that an individual whose
13 own child was being abused in the home, who did not
14 say anything, but she said something, but now you are
15 representing an individual who's also been accused of
16 child abuse and neglect, that seems off to me.

17 Q. Why does it seem off?

18 MS. INKELES: Objection to form.

19 A. Wouldn't most attorneys want to protect children?

20 Q. Are you implying that I do not wish to protect
21 children?

22 A. No. I think you're a good father, that's my
23 assessment, and I think you love your daughter.

24 Q. On what do you base that assessment?

25 A. I base that off of things that I've read as well.

1 And, again, I cannot give you specifics right now. But
2 at the same time, the aspect of defending somebody who
3 at the same time is being alleged abusive towards a
4 child, I have difficulty with that, for the safety of
5 the child.

6 Q. You indicated a few moments ago that you consider
7 yourself, along with everybody else, to be a journalist.
8 Do you believe that journalists have an obligation to
9 try to report facts accurately?

10 A. Yes. And I also believe that our first amendment
11 right allows us to share what we think and what we feel
12 as well as long as it's protected speech.

13 Q. So returning you to the question I asked you,
14 do you believe that journalists have an obligation to
15 investigate and try to verify facts before they report
16 them?

17 A. Correct. And I also believe that as an
18 independent journalist, I have the right of freedom of
19 speech as long as it's protected speech. So I can share
20 what I think and what I feel.

21 Q. You've stated that during whatever investigation
22 you conducted, you learned that my former wife abused
23 my child. Please tell me specifically what steps or
24 efforts you have undertaken to verify those facts.

25 A. It's what I read.

1 Q. Where did you read it?

2 A. Online.

3 Q. And do you believe that reading it on the
4 internet is sufficient efforts by someone who purports
5 to be a journalist to verify facts?

6 MS. INKELES: Objection to form.

7 A. I believe that I read it and I shared it because
8 that was my legal right to share it as freedom of
9 speech.

10 Q. Is everything that is read or published on the
11 internet true?

12 A. I don't know.

13 Q. Do people make mistakes on things that they read
14 or publish -- or that they write or publish on the
15 internet?

16 A. Absolutely. I make mistakes.

17 Q. You have in fact made mistakes, have you not?

18 A. I'm sure I have.

19 Q. For example, I believe in one of your videos, did
20 you not misidentify my paralegal as an attorney?

21 A. That, again, I can't recollect. I do recall in a
22 video you calling him the boss. That might be a recent
23 video that you called him the boss.

24 Q. You have a YouTube channel, I believe it's
25 called?

1 A. Yes.

2 Q. And on that YouTube channel you post videos;
3 correct?

4 A. Yes.

5 Q. Now, on YouTube there are people that -- I guess
6 for lack of a better word -- subscribe to your channel?

7 A. Viewers do have the option of subscribing.

8 Q. And are there videos that are available only to
9 subscribers as opposed to the general public?

10 A. Can you clarify your question, please?

11 MR. SHOCHET: Can we take a break right here at
12 this point? I need to set her up in the other room.
13 She'll be out and I'll be in. Can we have a ten-
14 minute break to go to the restroom?

15 MR. SILVERMAN: We're going to go off the record
16 at 9:50 a.m.

17 THE VIDEOGRAPHER: All right. At 9:50 a.m., we
18 are off the record.

19 (Thereupon, a brief recess was taken.)

20 THE VIDEOGRAPHER: All right. It's 9:56 a.m.
21 We are on the record.

22 Q. Mr. Hales, when we left off, we were speaking
23 about YouTube. I believe my question to you was, are
24 there videos that are available only to those people
25 that subscribe to your channel?

1 A. No.

2 Q. When we talk about subscribers, are they people
3 that simply click to just -- is it a paid subscription?

4 A. Can you clarify your question, please?

5 Q. Are there videos on your YouTube channel, that
6 you otherwise place on YouTube, that anybody can access?

7 A. Yes.

8 MR. SHOCHET: Form. You can answer.

9 Q. And are there videos that you place on YouTube
10 that only select people can access?

11 MR. SILVERMAN: Form. You can answer.

12 A. Yes.

13 Q. And how is it determined, to your understanding,
14 that only select people can access it? Is it a, for
15 example, paid subscription model?

16 A. It is what is titled membership model. So
17 subscriptions are completely and totally free. Anybody
18 can subscribe at any point in time.

19 Q. Is that the equivalent of on a website just
20 making a favorite on your bookmarks, just this is one of
21 the YouTube channels that somebody wants to get updates
22 from, that sort of thing?

23 A. Subscribing to a channel is the same as liking
24 something on Facebook. It means nothing. It literally
25 means nothing. It's just like going, uh, I like this.

1 Q. But there's a separate -- for lack of a better
2 word -- tier where somebody can pay to be a member of
3 your Facebook -- or your YouTube channel for -- that
4 would have access to certain things that the general
5 public would not?

6 MR. SILVERMAN: Form. You can answer when I say
7 form.

8 A. Yes, there is memberships.

9 Q. And what do you charge for a membership?

10 A. There's three tiers.

11 Q. Please describe them.

12 A. Tier number one is 4.99 a month. Tier number two
13 is 14.99 a month. Tier number three is 24.99 a month.

14 Q. And I assume there's a decimal point in each of
15 those after the four? In other words, it's not \$499,
16 it's \$4.99?

17 A. That's correct.

18 Q. And what does tier one, paying \$4.99 per month,
19 get an individual who subscribes to that or --

20 A. Specialized emojis.

21 Q. I'm sorry. What?

22 A. Specialized emojis.

23 Q. What does that mean?

24 A. How do I explain emojis to you?

25 Q. I know what an emoji is. In the context of --

1 I'm not that old. In the context of YouTube and your
2 subscription, what does a specialized emoji mean?

3 A. They can utilize an emoji that they would not be
4 able to utilize in YouTube unless they were a paying
5 member. It's a specialized emoji.

6 Q. How does a member on tier one use that emoji? In
7 a comment section or --

8 A. Uh-huh.

9 Q. Okay. So it just gives them the ability to use
10 a specialized emoji in the comments on your videos?

11 A. Uh-huh.

12 Q. Is that a yes?

13 A. Yes. I apologize, yes. I'm sorry.

14 Q. What does tier two, 14.99, get a person?

15 A. So they get the specialized emojis and an extra
16 live stream a week.

17 Q. How many live streams do you do per week?

18 A. One per everybody and an extra live stream a week
19 for paying members.

20 Q. And what does tier three get a person?

21 A. They get an extra video on top of the other
22 stacked items.

23 Q. Have you ever deleted a video off YouTube after
24 putting it online?

25 A. No. Oh, let me take that back. I apologize.

1 Can we strike that?

2 MR. SHOCHET: Yeah.

3 A. Yes, I have.

4 Q. When was the last time you deleted a video from
5 YouTube?

6 A. That I don't know.

7 Q. Has it been during the pendency of this case?

8 A. No.

9 Q. Has it been since you bought your property in
10 Florida?

11 A. Again, I don't know.

12 Q. Do you recall why you deleted the video?

13 A. Yes.

14 Q. Why did you delete the video?

15 A. I've deleted videos with an old girlfriend
16 before, a character known as George. In other words,
17 videos that I started YouTube with that were no more
18 relevant to --

19 Q. Was there more to that answer?

20 A. No. That was it.

21 Q. When did you begin charging for membership to
22 your Facebook -- or to your YouTube channel? Is that
23 the correct phrase? When did you begin charging
24 memberships?

25 A. Again, I don't know.

1 Q. How much income or revenue did you generate in
2 calendar year 2023 from YouTube memberships?

3 MR. SHOCHET: Objection to form. That's totally
4 irrelevant and you can certify it if you want.
5 That's not relevant to this. I'm going to instruct
6 him not to answer that question.

7 Q. Mr. Hales, how much revenue did you generate from
8 YouTube memberships in calendar year 2023?

9 MR. SHOCHET: Let's call the judge.

10 (Thereupon, a brief discussion was held off the
11 record between Mr. Shochet and the judge's JA.)

12 MR. SILVERMAN: Mr. Shochet, I would ask that
13 for the record you state the exact objection and
14 the legal authority upon which you rely for that
15 objection.

16 MR. SHOCHET: Finances are not at issue at all.
17 That kind of question is being used to harass him,
18 annoy him, embarrass him, publish it. If you want to
19 talk about confidentiality, you haven't even gotten
20 over the hurdle of relevance yet. So it's obviously
21 12.310, 12.330.

22 I can stop this now. But given the answers of
23 what happened before, it's wrong. So if you want to
24 ask other questions, go ahead. If you insist on
25 getting an answer, we're gonna stop till we get the

1 judge.

2 Q. Mr. Hales, your videos, both the ones that are
3 available to your members and the ones that are
4 available to the general public, have advertisements
5 placed in them; is that right?

6 A. Yes.

7 Q. And you receive revenue from that placement of
8 advertisements in the videos?

9 A. Uh-huh.

10 MR. SHOCHET: That's pretty obvious.

11 A. Yes.

12 Q. In calendar year 2023, how much revenue did you
13 generate from advertisements within your videos?

14 MR. SHOCHET: Same objection.

15 Q. Do you sell merchandise through your YouTube
16 channel?

17 A. Yes.

18 Q. What type of merchandise do you sell through your
19 YouTube channel?

20 A. Again, good question, don't know exactly the
21 answer, but sweatshirts, shirts, things like that.

22 Q. How much revenue did you generate in 2023 from
23 the sale of merchandise related to or from your YouTube
24 channel?

25 MR. SHOCHET: Same objection.

1 Q. Do you have any other method other than
2 memberships and advertising and the merchandising from
3 which you monetize or otherwise generate revenue from
4 the videos that you place on YouTube?

5 MR. SILVERMAN: Form.

6 A. Can you repeat the question, please?

7 Q. Do you have any other source of revenue or income
8 from your online posting of videos other than what we
9 have already discussed?

10 A. Yes.

11 Q. What is that source of revenue?

12 A. If I choose, I can do sponsorships.

13 Q. Do you in fact do sponsorships?

14 A. Rarely.

15 Q. When was the last time -- or do you have any
16 current sponsorships?

17 A. Not currently.

18 Q. When was the most recent occasion in which you
19 had a sponsorship?

20 A. I don't recall.

21 Q. Can you approximate when it was?

22 A. I really don't recall.

23 Q. With whom -- or who was the sponsor, the last one
24 that you had?

25 A. It was probably Olight flashlight.

1 Q. What's that?

2 A. Olight flashlight company.

3 Q. Can you tell me whether it was during -- whether
4 that sponsorship was active at any time during 2023?

5 A. Yes.

6 Q. Can you tell me whether it was active at any time
7 during the pendency of this case?

8 A. I don't believe so, but I can't recall exactly.

9 Q. You make reference in some of your online videos
10 to selling what you describe as your intellectual
11 property, video recordings of depositions, to either A&E
12 or to Netflix. Have you in fact sold any of your videos
13 to a third party?

14 A. Not yet.

15 Q. Do you intend to do so?

16 A. Potentially, yes.

17 Q. Have you received any offers?

18 A. Yes.

19 Q. From whom have you received offers?

20 A. A&E.

21 Q. And A&E has offered what precisely?

22 A. Rephrase your question, please.

23 Q. What has A&E stated they wish to purchase?

24 A. My videos.

25 Q. Which videos?

1 A. Videos in regards to my life in Otter Creek.

2 Q. Which videos specifically?

3 A. All of them.

4 Q. How much has A&E offered you?

5 A. None of your business.

6 MR. SHOCHET: Yeah. Not only is that an improper
7 question, but it's also confidential.

8 Q. Returning you to the question, Mr. Hales, how
9 much has A&E offered you?

10 MR. SHOCHET: Same objection as before, in
11 addition to adding confidential.

12 Q. Have you received offers from any other third
13 party or entity to purchase any of your videos?

14 A. Producers contact me all the time. The only --
15 and producers represent companies who want to purchase.
16 And the only conversation that I've actively engaged in
17 was with A&E.

18 Q. Please identify the other producers that --

19 A. Don't know their names.

20 Q. Please do not interrupt me, sir. Let me finish
21 my question. I'll certainly let you finish your answer
22 before I speak. Can you identify the companies or
23 agencies or entities that these producers work for or
24 with?

25 A. No, I cannot.

1 Q. Can you identify how many have contacted you?

2 A. No, I cannot.

3 Q. I'm going to return now to some earlier questions
4 that I asked you regarding a statement or insinuation
5 you made in one of your most recent videos about
6 collusion between the judge and me, specifically in
7 regards to a discussion about a rule of procedure
8 involving depositions. I'm going to show you a portion
9 of that video and ask you some questions about it.

10 MR. SILVERMAN: Cue it up, please.

11 THE WITNESS: Will I see that video?

12 MR. SILVERMAN: You can listen to it. It's not
13 necessary that you see it.

14 (Thereupon, the video was played.)

15 MR. SHOCHET: I don't hear anything from -- where
16 is his words?

17 Q. Mr. Hales, having listened to that excerpt of the
18 video posted on YouTube, do you now have a recollection
19 that that was indeed what you posted?

20 A. Yes.

21 Q. And that would be in a video that is entitled or
22 labeled He Finally Shut Her up in Court, court hearing
23 number four. Do you recall that?

24 A. Yes.

25 Q. Do you recall that you posted that video

1 yesterday?

2 A. Yes.

3 Q. That last comment -- editorial comment that you
4 made there about if you believe it wasn't preplanned,
5 something regarding excrement, are you indicating in
6 that comment that you in fact believe that Judge
7 DeThomasis and I had preplanned a discussion of Rule
8 12.310(d)?

9 MR. SHOCHET: Form.

10 A. I'm openly sharing that there's a bias in the
11 court. I'm openly sharing my thoughts and my feelings
12 as is protected by freedom of speech. And I'm opening
13 sharing about public figures, yourself and Judge Craig
14 DeThomasis.

15 Q. Returning you to the question I asked you, sir,
16 do you believe that there was collusion between the
17 judge and I -- sorry -- between the judge and me outside
18 of court regarding that specific issue of that rule of
19 procedure?

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

21 A. I'm openly sharing in the video on YouTube
22 exercising my first amendment right, and I'm sharing my
23 thoughts and my feelings of the biases in the court
24 hearing about public figures, you, Joshua Silverman, and
25 the judge, Craig DeThomasis.

1 Q. Returning you, sir, to the question I asked you,
2 do you believe that there was collusion between Judge
3 DeThomasis and me outside of court regarding the
4 discussion that occurred in court about the rule of
5 procedure?

6 MR. SHOCHET: Objection to form. That's the
7 third time you've asked the question. It's been
8 asked and answered.

9 MR. SILVERMAN: Mr. Shochet, I would ask you to
10 please refrain from speaking objections.

11 MR. SHOCHET: Objection to form.

12 A. I'm openly sharing my thoughts and my feelings,
13 exercising my first amendment right, about two different
14 individuals that are public figures, yourself and Craig
15 DeThomasis, in a court hearing which I am a part of
16 where I feel there is bias.

17 Q. Mr. Hales, did you understand my question?

18 A. Yes.

19 Q. Is there a reason that you are declining to
20 answer it directly?

21 MR. SHOCHET: Objection to form.

22 A. I answered your question very directly.

23 Q. Let me phrase it like this: I'm asking you for
24 a yes or a no. Yes or no, do you believe there was
25 collusion between Judge DeThomasis and me outside of

1 court --

2 MR. SHOCHET: Same objection.

3 Q. (Continuing) -- regarding a discussion that
4 occurred in court about Rule 12.310(d)?

5 MR. SHOCHET: Form.

6 A. I don't know.

7 Q. Are you in the habit of making allegations to
8 impugn the ethics of other individuals when you don't
9 know whether there are any facts to support your
10 allegations?

11 MR. SHOCHET: Objection to form.

12 A. I'm in the habit of sharing and exercising my
13 first amendment right of public figures, yourself and
14 the judge, Craig DeThomas, in a court hearing where I
15 believe there's a bias.

16 Q. Why is it that you believe there's a bias?

17 MR. SHOCHET: Form.

18 A. I believe that video, the very first excerpt, it
19 shares why I believe there's a bias. The judge, he
20 interrupts my legal counsel constantly through that
21 hearing and yet he's not interrupted you once during
22 that hearing. That to me, I believe there's a bias.

23 Q. All right. So you've indicated that the
24 frequency or lack thereof with which the judge
25 interrupts the attorneys on each side indicates a bias.

1 Are there any other facts that you would point to or
2 rely upon in asserting your opinion that the judge is
3 biased towards you in this case?

4 A. Yes, and I'm sure they're probably in the video.
5 But to point to them right now without video evidence, I
6 can't recall them.

7 Q. Is it your testimony that you cannot recall any
8 other facts or circumstances about the many hearings
9 that have been held in this case that leads you to
10 conclude or opine that Judge DeThomasis is biased
11 against you other than the interruption thing we just
12 talked about?

13 MR. SHOCHET: Objection to form.

14 A. Can you rephrase the question, please?

15 Q. Sir, what I'm asking you is to identify those
16 facts upon which you are relying or which in any way
17 form a part of your opinion that the judge in this case
18 is biased against you.

19 MR. SHOCHET: Objection to form.

20 MR. SILVERMAN: I'm sorry, Mr. Shochet. I have
21 not quite finished my question.

22 MR. SHOCHET: Okay.

23 Q. You have identified the frequency or lack thereof
24 with which the judge interrupts the attorneys on each
25 side of the case. What I'm asking you, sir, is are

1 there any other facts or circumstances upon which you
2 rely or which otherwise form the basis of your opinion
3 that the judge in this case is biased against you?

4 A. Yes.

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

6 A. Yes, the judge acting as legal counsel for
7 Lynette Preston. The judge every time the name Mark
8 Feather is brought up goes what I feel is irate, what I
9 feel is inappropriate behavior by a judge in a court-
10 room. The aspect that the judge has already truly in
11 one of the hearings claimed that Mark Feather is guilty
12 without a trial for Mark Feather beforehand and Mark
13 Feather represented me.

14 Q. Mark Feather still represents you, doesn't he?

15 MR. SHOCHET: He's not through with his answer.
16 Are you through with your answer?

17 THE WITNESS: No, I'm not. Please don't
18 interrupt me. We made an agreement, you wouldn't
19 interrupt me, I wouldn't interrupt you. And I'm
20 going to have to think through this. This is a lot
21 of information. This is months and months and months
22 going on right now.

23 The fact that the judge has given a temporary
24 injunction based off -- not what I have done, but
25 based off of allegations what Lienette (sic) Preston

1 has stated others have done, I believe there's a
2 bias. And I'm not finished yet. I'm still thinking.

3 The aspect that Judge Craig DeThomasis has denied
4 two motions to disqualify himself so far, though his
5 disqualification should be based on my feelings of
6 bias within the courtroom. And so he has absolutely
7 ignored my feelings of bias in the courtroom.

8 The aspect that myself and Martha Rizk have civil
9 protection orders against Lynette Preston and John
10 Cook and Judge Craig DeThomasis does nothing to
11 ensure our safety within the courtroom. As a matter
12 of fact, as Martha Rizk placed herself in a safe
13 position by my side, in between my lawyer, Randy
14 Shochet, and the deputy, the judge, Craig DeThomasis,
15 made her move further away from protection instead
16 of closer to protection within the courtroom.

17 The fact that the judge does nothing to ensure
18 that John Cook is 500-plus feet away every single
19 hearing thus far fore. The fact that the judge has
20 illegally taken away my first amendment right,
21 freedom of speech, has illegally taken away my right
22 to all of my property and access to it. The fact
23 that he has taken away my right to drive on my road
24 to access all of my property.

25 Q. Have you finished your answer?

1 A. I'm still thinking. The fact that the judge is
2 stating that as law, he must take the petitioner's plea
3 as truth. Therefore, I am found guilty until proven
4 innocent in this courtroom is a bias.

5 Q. Let me ask you a question about that.

6 A. I'm not done.

7 MR. SHOCHET: Keep going.

8 Q. We'll conclude your answer, Mr. Hales, and I will
9 certainly allow --

10 A. I'm not done.

11 Q. Mr. Hales --

12 MR. SHOCHET: Let the record reflect the witness
13 said he's not done.

14 Q. I will certainly allow that there very well may
15 be other reasons that you believe there's bias. We're
16 going to stop your answer at this point and I am not
17 going to certainly argue that you haven't included
18 something that you might wish to say. I want to ask you
19 some questions about the specific answers you gave.

20 You indicated that you believe the judge has
21 deemed you to be guilty, even though you're entitled to
22 be innocent until proven guilty; is that right?

23 A. Yes.

24 Q. Okay. Why do you believe that innocent until
25 proven guilty applies in a civil proceeding?

1 MR. SHOCHET: Objection to form.

2 A. That's my belief system, you're innocent until
3 proven guilty.

4 Q. On what is that belief based?

5 A. The legal system.

6 Q. What specifically about the legal system? What
7 fact in particular, fact or facts?

8 A. The aspect that from the foundational of youth,
9 you are told that you are innocent until proven guilty
10 in the legal system.

11 Q. And are you speaking about the American legal
12 system?

13 A. Yes.

14 Q. And where does that presumption of innocence
15 until proven guilty arise, to the best of your
16 knowledge, in the American legal system?

17 A. To the best of my knowledge, I do not know.

18 Q. In what situations does that presumption of
19 innocent until proven guilty apply in our American legal
20 system?

21 MR. SHOCHET: Objection to form.

22 Q. To the best of your knowledge. I'm not asking
23 you for a legal opinion.

24 A. Please ask or rephrase -- or please clarify your
25 question.

1 Q. To the best of your knowledge or to the best of
2 your understanding, from where does that presumption of
3 someone being innocent until proven guilty come from in
4 our legal system?

5 MR. SHOCHET: Form.

6 A. Again, can you please rephrase the question?

7 Q. What is the source of that presumption of
8 innocence until proven guilty --

9 MR. SHOCHET: Form.

10 Q. (Continuing) -- to the best of your knowledge?

11 MR. SHOCHET: Form.

12 A. That I don't know.

13 Q. Are you indicating that you have a foundational
14 belief about our legal system without any idea of where
15 it comes from?

16 MR. SHOCHET: Form.

17 A. I'm indicating that I believe every U.S. citizen
18 is told and ingrained within their psyche that you are
19 innocent till proven guilty in our legal system.

20 Q. You indicated that the judge has denied two
21 motions to disqualify him that you have filed through
22 counsel and that that is one of the reasons that you
23 believe that he is biased against you. Did I state that
24 accurately?

25 A. Yes.

1 Q. You made a statement in describing those two
2 motions to disqualify that the judge should have just
3 accepted what you were saying about the way you felt he
4 was biased and disqualified himself. I'm paraphrasing
5 you, of course, but is that generally accurate?

6 MR. SHOCHET: Form.

7 A. To answer your question, the judge motion to
8 disqualify is supposed to be based on feelings of the
9 individual who is in the courtroom, not based on the
10 actual judge. And so I do not believe that the judge,
11 Craig DeThomasis, has taken my feelings of biasness in
12 the courtroom -- I don't believe he's taken it serious.

13 Q. Are you stating that the judge should be required
14 simply to accept your allegations of bias as being true
15 for purposes of the motion?

16 MR. SHOCHET: Form.

17 Q. In your opinion. I'm not asking you for a legal
18 conclusion. I'm asking you your understanding -- or lay
19 understanding of this. Do you believe the judge should
20 be required simply to accept as true your allegations
21 that he is biased and disqualify himself accordingly?

22 MR. SHOCHET: Form.

23 A. Based on my feelings, not based on law -- based
24 on my feelings, when a judge tells me that "By law I
25 must take what the petitioner says as truth," I can't

1 fathom how a judge is not taking the respondent's aspect
2 and feelings of biasness as truth as well.

3 Q. Returning you to the question I asked you,
4 however, do you believe, based on your lay understanding
5 of the process, that the judge should be required to
6 accept as true your allegations alleging that he is
7 biased?

8 A. I do not know.

9 Q. You indicate that the judge found your lawyer,
10 Mr. Feather, guilty. To what were you referring?

11 A. Referring to a hearing where Craig DeThomasis
12 says the name Mark Feather yet again and continues to go
13 on a rant.

14 Q. Mr. Feather is still your lawyer, is he not?

15 A. He is part of co-counsel.

16 Q. In one or both of the videos that you posted in
17 the last couple of days, did you refer to him as your
18 previous or former lawyer?

19 A. I do not recall.

20 Q. At any time did you ever post on YouTube -- or
21 included in a video you posted on YouTube -- a request
22 or suggestion that anybody watching the videos contact
23 child protective authorities in the state of Florida
24 regarding Ms. Preston?

25 MR. SHOCHET: Form.

1 A. Can you rephrase the question, please?

2 Q. At any time or at any point in any video that you
3 have posted on YouTube or anywhere else online, have you
4 directed your viewers or suggested to your viewers that
5 they should call child protective authorities in the
6 state of Florida regarding Ms. Preston and her child?

7 A. Not to my knowledge, but if you have something --
8 you have to understand, I have thousands of videos and
9 hours upon hours upon hours of information. But what I
10 will share is that every single person is responsible,
11 if they see something wrong, they should be calling.

12 For example, you, Joshua Silverman, if you
13 realize that there is something wrong, you should be
14 calling. You are responsible as well to call. And I
15 would encourage anybody to go the right avenue and
16 contact the right people to make sure the right things
17 happen.

18 Q. Do you have a specific recollection of --
19 including within a video that you have posted online --
20 a suggestion that anybody watching should call the
21 Department of Children & Families in Florida about Ms.
22 Preston?

23 A. I don't have that recollection. But if we can
24 bring up video, I would appreciate it.

25 Q. Are you afraid of Ms. Preston?

1 A. Yes.

2 Q. Do you believe that Ms. Preston being able to
3 contact you in any manner is a clear and present danger
4 to your health, safety, or welfare?

5 A. Yes.

6 Q. In January of this year, did you tell a Levy
7 County sheriff's deputy that you intentionally unblocked
8 Ms. Preston's number because you wanted to get her to
9 violate the civil protection order out of Ohio?

10 A. No.

11 Q. Okay. And --

12 A. To be clear, we can request the audio on his
13 chest cam. So as he wrote that, he wrote that
14 inappropriately. The Levy County sheriff asked me, "Do
15 you have her blocked?" I said, "Obviously not. I've
16 unblocked her. How do I know if she's breaking the
17 civil protection order if she's blocked?"

18 Q. You and Ms. Rizk allege --

19 A. It's Rizk.

20 Q. (Continuing) -- Rizk -- I'm sorry -- allege that
21 Mr. Cook violated a civil protection order out of Ohio
22 when he was outside the courthouse at the prior hearing
23 that we had on January 23rd of this year?

24 A. Yes.

25 Q. And you and Ms. Rizk posted a video about that

1 onto YouTube after the hearing?

2 A. I posted a video about it, yes.

3 Q. A portion of that video included body cam footage
4 of a Levy County sheriff's deputy interacting with Ms.
5 Rizk outside the courthouse?

6 A. Levy County sheriff deputies do not have body
7 cams.

8 Q. Or there was some type of video -- it was Ms.
9 Rizk recording the video; correct?

10 A. Yes.

11 Q. And that video was included in the YouTube video
12 that you posted online?

13 A. Yes.

14 Q. Do you recall discussion during that video by you
15 or Ms. Rizk or both about the fact that Mr. Cook had no
16 reason to be at the courthouse that day?

17 A. I do not recall.

18 Q. Do you believe that Mr. Cook had a reason to be
19 at the courthouse that day?

20 MR. SHOCHET: Form. You can answer.

21 A. No.

22 Q. Why was Ms. Rizk at the courthouse that day?

23 A. Ms. Rizk is a witness in this case.

24 Q. Okay. To what would she testify on January
25 23rd, which was a hearing on a motion to continue and

1 potentially a motion on sanctions and deposition
2 matters?

3 A. As if I could guess what direction this judge is
4 going to go on a daily basis.

5 Q. Did you discuss with Ms. Rizk prior to the two
6 of you coming to the courthouse the purpose of her
7 appearance at the courthouse that day?

8 A. It's not an active conversation, just we were
9 going to be at the courthouse.

10 Q. So it's your position that Ms. Rizk was properly
11 at the courthouse that day and had a reason to be there
12 because she's potentially a witness in this case?

13 A. Yes.

14 Q. Mr. Cook is potentially a witness in this case.
15 Yes?

16 A. There is potential.

17 Q. Explain to me, if you would, why it would be
18 appropriate for Ms. Rizk to be at the courthouse that
19 day but not Mr. Cook, if both are potential witnesses in
20 this case.

21 MR. SHOCHET: Objection to form.

22 A. Can you rephrase the question?

23 Q. Explain to me the distinction that you are making
24 between why it is appropriate for Ms. Rizk to be at the
25 courthouse that day but not Mr. Cook, if by your own

1 admission both are potential witnesses in this case.

2 MR. SHOCHET: Objection to form. Go ahead.

3 A. Mr. Cook would have been appropriate if he was
4 in the courthouse, would he have not? He would not
5 have been breaking the civil protection order out of
6 Ohio. But Mr. Cook is outside breaking the civil
7 protection order out of Ohio. He's on a public road.
8 He's inappropriately at the courthouse.

9 So if he was appropriately at the courthouse, he
10 should have been in the courthouse.

11 Q. To the best of your knowledge, Mr. Cook was at
12 the courthouse, outside the courthouse, before you and
13 Ms. Rizk came to the courthouse that morning?

14 MR. SHOCHET: Form.

15 A. I don't recall.

16 Q. Was he there when you and Ms. Rizk arrived at the
17 courthouse?

18 A. Again, I don't recall.

19 Q. Do you recall Ms. Rizk stating on the video and
20 telling the deputy that Mr. Cook was already there when
21 she arrived?

22 A. I don't recall. And if Mr. Cook was there as we
23 arrived, per the civil protection order out of Ohio, Mr.
24 Cook has a responsibility to leave.

25 Q. Identify, if you would, please, each witness that

1 you intend to call at the final hearing in this case --
2 that you may call at the final hearing. Let me rephrase
3 that question. I'm not asking the ones that you
4 specifically intend to call. I'm asking you to identify
5 any witness that you may call.

6 A. I don't have a finalized witness list as of yet.

7 Q. All right. Well, let's go through the witnesses
8 that as of right now you know that you may call.

9 A. Again, I don't have a finalized witness list. I
10 haven't communicated that with my lawyer.

11 MR. SHOCHET: And that's inappropriate. Do not
12 discuss anything that you and I discussed about the
13 witness list.

14 THE WITNESS: Correct.

15 MR. SHOCHET: Very inappropriate. I don't think
16 Mr. Silverman is asking that. I hope he's not.

17 MR. SILVERMAN: Mr. Shochet, I am again going to
18 ask you to keep the editorializing and speaking
19 objections to a minimum or nonexistent, please.

20 MR. SHOCHET: As I recall at our last deposition,
21 that didn't go forward from your side either. But
22 I'm just instructing the witness that if he has to
23 rely on anything that you and I discussed about
24 witnesses to answer that question, that is work
25 product, you are not to answer that question.

1 But if you know witnesses who may be having
2 information that you can rely on outside of our
3 conversations, knock yourself out.

4 Q. You indicated Ms. Rizk may be a witness. What
5 would you expect her to testify to in this proceeding?

6 A. That would be up to my attorney to question her
7 for her testimony.

8 Q. I'm not asking you what questions your attorney
9 is going to ask her. I'm asking you, Jeremy Hales, what
10 you think Ms. Rizk would testify to in this case.

11 MR. SHOCHET: Form. Objection to form.

12 A. I'm not Ms. Rizk. I can't answer that question.

13 Q. You are the respondent in this case?

14 A. Yes.

15 Q. You've identified Ms. Rizk as a witness. In
16 fact, stated that was the reason she was in court on
17 January 23rd. To which issues in this case do you
18 believe she would have relevant testimony?

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

20 A. She has testimony of truth.

21 Q. What specific issues, Mr. Hales, do you believe
22 Ms. Rizk would have relevant testimony?

23 MR. SHOCHET: Form.

24 A. Again, I'm not Ms. Rizk. I don't know what she's
25 going to testify to or what she is going to say.

1 Q. Have you discussed with Ms. Rizk what you expect
2 her testimony to be?

3 A. No.

4 MR. SHOCHET: Objection to form of that as well.

5 Q. Have you discussed with Ms. Rizk what has
6 occurred in court proceedings?

7 MR. SHOCHET: Form.

8 A. Rephrase the question, please.

9 Q. Have you discussed with Ms. Rizk what has
10 occurred during various court proceedings in this case?

11 A. I have discussed to a camera, exercising my
12 freedom of speech, my first amendment right.

13 Q. Returning you to the question I asked you, sir,
14 have you discussed with Ms. Rizk what has occurred in
15 various court proceedings in this case?

16 MR. SHOCHET: Objection to form.

17 A. Returning you to the answer, I've discussed to a
18 camera, exercising my first amendment right.

19 Q. Have you discussed with Ms. Rizk what has
20 occurred in court proceedings in this case?

21 MR. SHOCHET: Objection to form.

22 A. I've discussed to a camera, exercising my first
23 amendment right, of what has occurred in this case.

24 Q. Mr. Hales, do you understand my question?

25 A. Yes.

1 Q. And in my question did I ask you if you discussed
2 with a camera what has occurred in court proceedings in
3 this case?

4 MR. SHOCHET: Form.

5 A. You just asked me that. You've just now asked me
6 if you -- asked if you discussed to a camera, so yes.

7 Q. Sir, my question to you -- put it this way: In
8 the question have you discussed with Ms. Rizk what has
9 occurred in court proceedings in this case --

10 A. I've discussed --

11 Q. If you will allow me to finish my question, sir.
12 (Continuing) -- does the word camera appear in the text
13 of that sentence at all?

14 MR. SHOCHET: Objection to form.

15 A. I have discussed what has happened to this case
16 to a camera.

17 Q. Mr. Hales, is there a reason that you are
18 refusing to answer the question I've asked you?

19 MR. SHOCHET: Objection to form.

20 A. There's no reason, it's reality. I've discussed
21 the case to a camera.

22 Q. Have you discussed what has occurred in court
23 proceedings in this case with or in the presence of Ms.
24 Rizk --

25 A. In the presence, yes.

1 Q. If you would allow me to finish my question.

2 (Continuing) -- when there was no camera rolling?

3 A. No.

4 Q. Is Ms. Rizk employed?

5 A. Ms. Rizk -- are you finished? I want to make
6 sure. You paused and I interrupted you multiple times
7 before when you paused and I don't want to continue to
8 interrupt you.

9 Q. Is Ms. Rizk employed?

10 MR. SHOCHET: Form.

11 A. Ms. Rizk is an independent contractor.

12 Q. What is the nature of her work?

13 A. As an independent contractor?

14 Q. Yes, sir.

15 A. She works on social media.

16 Q. What type of work does she do on social media?

17 A. She does videoing. She does -- she does art work
18 creation. She does selling.

19 Q. And with whom does she contract?

20 A. Elephant Shoe, LLC.

21 Q. Your company?

22 A. Yes.

23 Q. And what is the total amount of payments made to
24 Ms. Rizk from Elephant Shoe, LLC --

25 MR. SHOCHET: Objection, it's again inappropriate

1 financial inquiry and it's irrelevant. It's also
2 confidential. So I'll instruct the witness not to
3 answer it.

4 MR. SILVERMAN: Mr. Shochet, if you would be so
5 kind as to allow me to finish my questions before you
6 pose your objections.

7 MR. SHOCHET: It's hard to tell sometimes.

8 Q. What is the total amount of compensation paid to
9 Ms. Rizk from Elephant Shoe, LLC, in 2023?

10 MR. SHOCHET: Same objection, same instruction.

11 If you want to call the judge, we can try it again.

12 Q. What is the total amount of compensation paid to
13 Ms. Rizk from Elephant Shoe, LLC, in 2024?

14 MR. SHOCHET: Objection, same objection. Do you
15 want me to try to call the court?

16 MR. SILVERMAN: Mr. Shochet, I understand that
17 this is being recorded by video. I would ask you to
18 please put a cap on the grandstanding. This is not
19 your deposition.

20 MR. SHOCHET: Okay. Well, if you have another
21 question, you can go ahead.

22 Q. What is the total amount of compensation paid in
23 total to Ms. Rizk all time from Elephant Shoe, LLC?

24 MR. SHOCHET: Same objection. And now we're
25 going to try to seek the judge.

1 MR. SILVERMAN: Pause at 10:40 a.m.

2 THE VIDEOGRAPHER: Off the record.

3 THE WITNESS: Wouldn't we want this on the
4 record?

5 MR. SHOCHET: Yeah, we do, but --

6 THE WITNESS: He's off the record. We need him
7 on the record.

8 MR. SHOCHET: Why did you go off the record? I
9 didn't agree to go off the record. Stay on the
10 record.

11 THE VIDEOGRAPHER: Go ahead. On the record.

12 MR. SHOCHET: Okay. We tried.

13 Q. Does Ms. Rizk have any source of income other
14 than the revenue she generates from Elephant Shoe, LLC?

15 MR. SHOCHET: Objection to form. You can answer
16 if you know.

17 A. I don't even know.

18 Q. Are you employed by the state of Florida in any
19 capacity?

20 A. No.

21 Q. Are you employed by the state of Ohio in any
22 capacity?

23 A. No.

24 Q. Do you have any training in social work?

25 A. Yes.

1 Q. What is that training?

2 A. I ran a Christian camp conference center and I
3 specialized in children counseling. I have a master's
4 degree from a seminary in regards to non-profit work
5 with emphasis on children.

6 Q. Master's degree in what?

7 A. Organizational leadership.

8 Q. Do you have any licensure for social work or
9 mental health counseling?

10 A. No.

11 Q. Have you ever worked for a child protective
12 agency?

13 A. No.

14 Q. Have you ever worked for a law enforcement
15 agency?

16 A. No.

17 Q. Have you ever encouraged or directed any of your
18 viewers to contact any agency with any government
19 other than child protective services in regards to Ms.
20 Preston?

21 A. Can you please rephrase the question?

22 Q. Have you ever encouraged or directed the viewers
23 of your videos online to contact any government agency
24 regarding Ms. Preston other than child protective
25 services?

1 A. I've encouraged the viewers to allow me to handle
2 things legally, but every viewer -- you two have just
3 viewed a video. If you see something that is
4 inappropriate, if you see something that is wrong, you
5 have a responsibility to contact somebody, if you go the
6 right routes and the right people. So I'm not going to
7 hesitate. I would hope that you two would do the right
8 thing and contact the right individuals.

9 But I have constantly -- from day one have always
10 emphasized to the viewers of What The Hales do not
11 contact any individual that they see in any video, do
12 not make any contact, do not say anything, do not do
13 anything. If you come to Otter Creek, be appropriate.
14 Always allow me to handle things the legal right way.

15 Q. Have you accused Ms. Preston of abusing drugs?

16 A. Can you rephrase that question, please?

17 Q. Have you accused Ms. Preston of abusing drugs?

18 A. I have reposted what Ms. Preston has posted about
19 her own drug use.

20 Q. Returning you to the question I asked you, sir,
21 have you accused Ms. Preston of abusing drugs?

22 A. Returning to the answer --

23 MR. SHOCHET: Objection to the form.

24 A. Returning to the answer, I've reposted what Ms.
25 Preston has posted about her own drug use.

1 Q. Have you repeatedly called her a drug user
2 online?

3 MR. SHOCHET: Hold on. Objection to form. You
4 can answer.

5 A. I believe the words that I've used is rug.

6 Q. Do you believe that your viewers know exactly
7 what you mean by rug?

8 MR. SHOCHET: Objection to form. You can answer.

9 A. I believe the viewers see the facts that have
10 been reposted from Ms. Preston's own post and can make
11 their own conclusions to truth.

12 Q. Returning you to the question I asked you, sir,
13 do you believe that your viewers know what you mean when
14 you use the word rugs instead of drugs?

15 MR. SHOCHET: Objection to form.

16 A. Returning to the same answer, same as before.

17 Q. I'm asking you for a yes or no, sir. Do you
18 believe that your viewers know that you mean drugs when
19 you use the word rugs?

20 MR. SHOCHET: Objection to form.

21 A. Regardless of your answer required that you want
22 of a yes or no, I cannot get in the mind of my viewers
23 and answer on behalf of my viewers.

24 Q. Sir, I'm not asking you to answer on behalf of
25 your viewers. I'm asking you, Jeremy Hales, when you

1 use the word rugs instead of drugs, do you do so with
2 the understanding or the belief or the hope that your
3 viewers will know that you're talking about drugs?

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

5 A. I can't answer for my viewers no more than I
6 could answer for you or if I could answer for Brent.

7 Q. Have you ever met Mr. Lanier before today, sir?

8 A. No.

9 Q. Why is it that you believe it's appropriate in a
10 proceeding such as this to address people by their first
11 names?

12 MR. SHOCHET: Objection to the form.

13 A. My personal training in social work, people are
14 identified by their first name. Friendships are
15 established based on first name, not by proper Mr. or
16 Mrs. or Ms. and using the last name. To establish
17 friendships and to cultivate relationships, first names
18 are essential.

19 And I believe Brent is probably a phenomenal
20 individual and I'm sure you are as well. So I attempt
21 to use people's first names on purpose.

22 Q. Are you aware that viewers of your videos have in
23 the past contacted Ms. Preston in a threatening manner?

24 MR. SHOCHET: Objection to form.

25 A. I'm aware of Ms. Preston making allegations.

1 Q. Have you reviewed her filings in this case and
2 her petition and supplemental affidavits?

3 A. Can you rephrase the question?

4 Q. She has filed a petition for an injunction and
5 some supplemental affidavits along with that. Have you
6 reviewed those documents?

7 MR. SHOCHET: If you want to identify -- she's
8 filed, I think, two petitions.

9 THE WITNESS: Yeah, please identify.

10 MR. SHOCHET: And supplements.

11 THE WITNESS: And there's one sealed. So the
12 answer is no. There's one sealed. I haven't seen
13 any of it yet. And 400-plus pages, I haven't gone
14 through all of that. I've read aspects of it.

15 Q. Did you see in her petition for an injunction a
16 copy of a message that appears to have been sent through
17 Facebook from an individual to Ms. Preston?

18 MR. SHOCHET: Form.

19 A. Again, I don't recall.

20 Q. Do you recall -- it should be on Page 10 of her
21 petition -- a message from an individual, at least
22 identified in the message as Cathy Townes Arbour,
23 A-r-b-o-u-r, in which the individual writes as follows
24 to Ms. Preston: "You are nothing but a piece of garbage
25 and blame everyone else for your crap and lies. I

1 talked to Harley's real grandmother and gave her phone
2 numbers to call to take her away from you two rotten
3 people and give her a happy life.

4 "If you want to know something else, I called
5 welfare on you, along with animal control, and so has
6 many other people, and we won't stop till you-all are in
7 jail and Harley is taken away. You leave Jeremy and
8 George's life alone. You're" -- misspelled -- but "You
9 are going down one way or another and Harley's going
10 home to her real granny, not your rotten piece of crap.
11 Contact me back, I dare you."

12 Do you remember seeing that -- a copy of that
13 message included within Ms. Preston's injunction
14 petition in this case?

15 A. No, I don't recall it.

16 Q. And it's your testimony, sir, just to be clear,
17 that you have not -- I understand there's an issue with
18 the sealed document. But the documents that are not
19 under seal, you have not read everything?

20 A. No, I have not read everything.

21 Q. In some of your videos, do you now explicitly
22 state that nobody watching should contact anybody
23 involved in this case?

24 A. I've stated that for years now.

25 Q. And has that been consistent that you've stated

1 that?

2 A. Yes.

3 Q. Have you ever stated anything different from
4 that?

5 A. I've always stated don't contact anybody, let me
6 handle this legally, always. This hasn't been recent.
7 This has been from the very beginning when I got stalked
8 to Otter Creek.

9 Q. What does Ms. Preston's child have to do with
10 you?

11 A. The same that Ms. Preston's child has to do with
12 you. You have a moral responsibility to report when
13 something is wrong, neglect, abuse. Every decent human
14 being has a moral responsibility to defend those who are
15 defenseless. I hope you agree with me.

16 I truly hope you agree with me, especially under
17 your own family circumstances, and that children should
18 be protected. And so when individuals see children
19 that are being neglected, not protected, there is a
20 responsibility.

21 Q. Who is it that makes the determination in your
22 view whether a child is being neglected or abused?

23 MR. SHOCHET: Objection to form. You can answer.

24 A. Please rephrase the question.

25 Q. Who in your opinion should be the ultimate

1 arbiter of whether a child is being abused or neglected?

2 A. In my opinion, it's my responsibility to report.

3 Q. Have you --

4 A. If I believe something is wrong, it's my
5 responsibility to report.

6 Q. Have you previously stated to other individuals
7 that you have contacted the Department of Children &
8 Families about Ms. Preston and her child?

9 A. I have been very open that I've contacted
10 children services in regards to her child --

11 Q. How many times?

12 A. (Continuing) -- and the safety of her child.
13 I've contacted one time. I've contacted one time in
14 regards to the child's safety. I've contacted one time
15 in regards to Ms. Preston's safety, because she has
16 posted that John is abusive and John is financially --
17 and raping her, and the list goes on and on and on.

18 So I've contacted on her own behalf for her own
19 safety. So I've contacted twice social services.

20 Q. To your knowledge, has Ms. Rizk contacted --
21 Rizk, sorry -- contacted the Department of Children &
22 Families regarding Ms. Preston and her family?

23 A. To my knowledge, no.

24 Q. To your knowledge, have there been other reports
25 made to the Department of Children & Families about Ms.

1 Preston and her family?

2 A. Yes.

3 Q. And is it your understanding that there have
4 been at least a half dozen such reports made to the
5 Department of Children & Families?

6 A. Can you please rephrase the question, please in
7 a timeline? I need the clarification of a timeline.

8 Q. Since you've purchased your property in Otter
9 Creek.

10 A. Ms. Preston has been involved in social services
11 her entire life. So in regards to your question, she
12 has a life pattern of being involved with social
13 services. So since the time I've bought my property, I
14 don't know how many times that children services has
15 been to her property.

16 From her own post and from what John Crook posts,
17 I believe they've stated 11 times as of current, maybe
18 12.

19 Q. I noticed you just called him John Crook with an

20 R. Is that his name?

21 A. His name is John Cook.

22 Q. Yet you called him John Crook; right?

23 A. Absolutely.

24 Q. And you don't call Ms. Preston Lynette Preston.

25 You call her Lienette Preston?

1 A. I call her Lienette.

2 Q. You have a degree. You say you have social work
3 backgrounds and religious counseling. Can you please
4 identify for me, sir, the exact chapter and verse of the
5 New Testament in which --

6 A. Why negate the Old Testament?

7 Q. Sir, if you'll let me finish my question. Can
8 you identify the exact chapter and verse in the New
9 Testament upon which you rely to support the notion that
10 you can use pejorative names against folks?

11 MR. SHOCHET: Form.

12 A. First of all, it's for protection. So I am not
13 using her actual name. I am using a pseudo name for her
14 own protection, for his own protection. I would think
15 they would be happy about that.

16 And Jesus himself called the Pharisees those
17 evil doers, the whitewashed sepulchres, the snakes. So
18 he's the one that chased out the money-changers with
19 whips, flipped the tables in justified anger of the
20 wrongdoing.

21 So if you really want a chapter and verse, I
22 don't know why you negate the Old Testament. Why don't
23 you just put the whole Bible together as it all comes
24 together. The aspect is I use the name Lienette because
25 it's not her name.

1 And I'm sure as you're already aware as her
2 counsel, she goes by the name Michelle. Would you agree
3 with me? It's not Lynette, it's Michelle. She goes by
4 Michelle, even though she has a life history of going
5 by Lacy. So using the name Lienette is for her own
6 protection. Using the name Crook is for his own
7 protection.

8 Q. I want to be sure I understand your contention.
9 Is it your statement, sir, that calling somebody a crook
10 or a liar is for their own protection?

11 A. It's for their own protection not using their
12 names. Just so we clarify, I do not use their real
13 legal names.

14 Q. Do you believe that anybody is confused about to
15 whom you're referring when you say Lienette Preston or
16 John Crook?

17 MR. SHOCHET: Objection to form.

18 A. I believe that I'm exercising my first amendment
19 right and will continue to do so.

20 Q. Returning you to the question I asked you, sir,
21 do you believe that anybody is confused about to whom
22 you're referring when you use those two pejorative
23 names?

24 MR. SHOCHET: Objection to form, same objection.

25 A. Returning to the answer, Joshua, I will exercise

1 my first amendment right and continue to do so.

2 Q. Mr. Hales, I want to be clear since we are on
3 the record, I can certainly appreciate your point of
4 view using first names, but I don't know you and you
5 don't know me. And this is a formal legal proceeding
6 and I'm going to ask you with respect to call me Mr.
7 Silverman. I will call you Mr. Hales. But you and I
8 are not on a first name basis. Do you understand?

9 A. Absolutely, Joshua.

10 Q. Can you explain to me, Mr. Hales, why in response
11 to what I just said you would address me by my first
12 name?

13 A. That helps cultivate relationships.

14 Q. Do you understand that you and I are in a
15 situation where I am an attorney, you are a witness/
16 party being deposed? Do you understand that dynamic?

17 A. Absolutely.

18 MR. SHOCHET: Hold on.

19 THE WITNESS: Oh, sorry.

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

21 Q. So when I ask you to refer to me as Mr.
22 Silverman, are you stating that you are not going to
23 honor that request?

24 A. I'm stating that your name is Joshua. I would
25 like to cultivate a relationship with you. I think we'd

1 be fine outside of court.

2 Q. I understand that you want to cultivate a
3 relationship. Is there a reason why you cannot abide by
4 the request and instruction within the context of this
5 case?

6 A. I would like to exercise my first amendment
7 right, freedom of speech.

8 Q. I'm not asking you for a legal conclusion, Mr.
9 Hales, but you have repeatedly referenced your first
10 amendment rights and freedom of speech during this
11 deposition. Do you believe that there are any
12 limitations on your first amendment rights?

13 A. Uh-huh.

14 Q. Is that a yes?

15 A. Yes.

16 Q. And what are those limitations?

17 A. I apologize, yes. Anything hate speech.

18 Q. What is hate speech?

19 A. Maybe I don't understand it completely.

20 Q. Well, I'm not asking you again for a legal
21 conclusion or a legal analysis. But I'm asking you, as
22 you understand your first amendment rights, to explain
23 to me what you believe --

24 A. Okay.

25 Q. (Continuing) -- the limitations on those rights

1 are.

2 A. I don't believe stating "I'm going to nail him to
3 a cross" is protected speech, and that's a direct quote
4 from your petitioner, from your actual client, "We're
5 going to nail him to the cross." I don't believe that's
6 protected. I do believe saying, "He's a crook, she's a
7 liar," that's protected.

8 Q. Are you a fact journalist or are you an opinion
9 journalist?

10 A. I exercise my first amendment right.

11 Q. Are you a fact journalist or an opinion
12 journalist?

13 A. I exercise my first amendment right.

14 Q. Do you understand the question I'm asking you,
15 sir?

16 A. I exercise my first amendment right.

17 Q. Do you understand the question I asked you, sir?

18 A. I share both facts and opinions. I exercise my
19 first amendment right.

20 Q. Did you contact the grocery store in Levy
21 County with the intent to get the grocery store to stop
22 providing free produce to Ms. Preston?

23 MR. SHOCHET: Objection to form. You can answer.

24 A. I contacted the grocery store so that they
25 would limit their liability, as Ms. Preston was giving

1 spoiled food to individuals in exchange for work on her
 2 property, and they were legally liable if something
 3 happened to those individuals, which come to find out a
 4 drug addict was providing those spoiled foods to Ms.
 5 Preston and Mr. Cook illegally and the manager had no
 6 knowledge of it whatsoever, which that increases legal
 7 liability.

8 Q. So is it your testimony that --

9 A. I just gave my testimony.

10 Q. Please don't interrupt me, Mr. Hales. Is it your
 11 testimony that you contacted the grocery store out of
 12 concern for potential liability the grocery store may
 13 have had?

14 A. Absolutely.

15 Q. How at all, if at all, did the grocery store
 16 giving food to Ms. Preston affect you?

17 MR. SHOCHET: Objection to form. You can answer.

18 A. When I see something that's going wrong, I have
 19 a moral responsibility to try and contact somebody to
 20 make it right, the same as you do, the same as we all
 21 do.

22 Q. Did it affect you financially?

23 A. Not at all.

24 Q. Did it affect your use or enjoyment of your
 25 property?

1 A. Not at all. Well, I'll back that if we -- I
2 don't know if we can strike that or not. But she would
3 drop -- she would drop rotten food off at my front gate.
4 So, yes, it did. She would drop off rotten food at my
5 front gate.

6 Q. Would you agree with the proposition that you
7 cannot cure all ills and evils in the world?

8 MR. SHOCHET: Objection to form. You can answer.

9 A. I don't understand what you're trying to ask.

10 Q. You've testified several times during this
11 deposition that when you see something wrong, you feel
12 you have a moral obligation to act upon it; correct?

13 A. Yes.

14 Q. Do you believe that you have a moral obligation
15 to act upon every wrong that you experience or observe
16 in the world?

17 A. No person can, but I try and correct those things
18 that are in my sphere of influence.

19 Q. Have you ever walked by a homeless person on the
20 street and not given that person money?

21 MR. SHOCHET: Objection to form. You can answer.

22 A. Yes.

23 Q. Have you ever seen somebody speeding while
24 driving and not immediately call the police to report
25 them?

1 A. Yes.

2 MR. SHOCHET: Form.

3 THE WITNESS: Sorry.

4 Q. Have you ever seen someone commit a crime and not
5 immediately call the police to report them?

6 MR. SHOCHET: Form.

7 A. No.

8 Q. Have you ever seen somebody do something that you
9 personally considered to be unethical or immoral and not
10 immediately intervene?

11 MR. SHOCHET: Form.

12 A. Not to my recollection.

13 Q. Please tell me how, within your personal belief
14 system, you choose which immoral things to address and
15 which ones not to address.

16 MR. SHOCHET: Form.

17 A. I think the first tier is protecting those who
18 are unprotected, those who can't protect themselves,
19 children, elderly, and trying to correct those
20 situations. And I do what I can in my sphere of
21 influence. That's one of the passions of my life, is
22 try and help people. It's one of the reasons why Ms.
23 Preston, your client, stalked me to Otter Creek.

24 Q. Have you ever had a dispute with any other
25 neighbor in your adult life?

1 A. Uh-huh.

2 Q. Is that a yes?

3 A. Yes.

4 THE WITNESS: I apologize, ma'am.

5 Q. How many times? Well, strike that question. How
6 many different neighbors have you had disputes with in
7 your adult life?

8 A. In Otter Creek, two others.

9 Q. That's just in Otter Creek?

10 A. That's the only neighborly disputes I've ever had
11 in my life are in Otter Creek.

12 Q. And who are those neighbors?

13 A. One set of neighbors would be -- I don't know
14 Susie's last name. Let me give some context.

15 Q. I'm just asking you what their names are, sir.

16 A. Susie.

17 Q. And the other neighbor?

18 A. Bryan and Tina.

19 Q. So if I understand you correctly, since you
20 purchased property in Otter Creek to spend the winter
21 months, you've had disputes with Ms. Preston and Mr.
22 Cook being one set of neighbors; is that right?

23 A. To clarify your question, you said since
24 purchasing property. With Lienette and Crook, the
25 answer is no. When I purchased the property, they were

1 not there. They followed me to Otter Creek. After they
2 arrived to Otter Creek, yes.

3 Q. Again, if you'll listen to my question, sir.
4 Since you purchased property in Otter Creek, you've had
5 disputes with Lynette Preston and John Cook. Yes?

6 A. Yes.

7 Q. And an individual that you identify as Susie?

8 A. Yes.

9 Q. And individuals you identify as Bryan and Tina?

10 A. Yes.

11 Q. Who is the common denominator to all three of
12 those neighborly disputes?

13 A. The purchaser of the property, myself.

14 Q. Have you had disputes with the neighbors anywhere
15 else?

16 A. No.

17 Q. To your knowledge, has the Department of
18 Children & Families in Florida actually conducted an
19 investigation of Ms. Preston relative to her care of
20 her child?

21 A. My knowledge is only limited to what she has
22 posted online, and based on what she has posted online,
23 yes.

24 Q. To your knowledge, has the Department of Children
25 & Families taken any action against Ms. Preston related

1 to alleged abuse, abandonment, or neglect of her child?

2 A. To my knowledge, which is only based on what
3 she's posted, whether true or untrue, the only action
4 that I am aware of that she's posted is they made her
5 and John live in separate things, split.

6 Q. To your knowledge, has law enforcement taken
7 any action against Ms. Preston for any alleged abuse,
8 abandonment, or neglect of her child?

9 MR. SHOCHET: Form.

10 A. To my knowledge, I do not know.

11 Q. You indicated that you believe you have a moral
12 obligation to remedy immoral things if you see them, and
13 I know I'm paraphrasing. At what point does that moral
14 obligation end?

15 In other words, if DCF investigates and finds
16 nothing and does nothing and law enforcement
17 investigates and finds nothing and does nothing, do you
18 believe that you must still continue making allegations
19 and trying to intervene, even though the appropriate
20 authorities have investigated and found no reason to
21 intervene?

22 MR. SHOCHET: Objection to form. You can answer.

23 A. I believe if a conclusion was shared with me,
24 then I can make an appropriate decision at that point in
25 time.

1 Q. Have you ever made statements in your online
2 videos that you will not stop talking about and --
3 talking about Ms. Preston and Mr. Cook and being
4 involved in their lives until they leave town?

5 MR. SHOCHET: Form.

6 A. I do not recall.

7 Q. Have you ever made statements that you intend to
8 continue your involvement in their lives or commentary
9 on their lives until they sell their property?

10 MR. SHOCHET: Objection to form. You can answer.

11 A. I do not recall.

12 Q. Have you ever made any statements that it is your
13 hope, desire, or intent that one day they be required to
14 declare bankruptcy?

15 MR. SHOCHET: Form.

16 A. I do not recall.

17 Q. Would you like them to leave town?

18 A. I can't force anybody to leave town. What I'd
19 like them to do is get the necessary help to be healthy.
20 And I think first and foremost -- and again, it's my
21 opinion, it's my basis -- that they're not receiving the
22 help that they need. There is something extremely wrong
23 and I would like to see them get healthy and get the
24 appropriate help.

25 Q. The question I asked you though was not whether

1 you could force them to leave town. The question I
2 asked you is if you would like them to sell their
3 property and leave town.

4 A. It has nothing to do with me, so I don't have any
5 comment on that.

6 Q. Whether it has anything to do with you or not,
7 is it your preference that they sell their property and
8 leave town?

9 A. My preference is, is that they adhere to the
10 civil protection orders granted in Ohio, stay 500 feet
11 away and don't contact us, and that they get healthy and
12 they do the appropriate things that they need to do to
13 be healthy.

14 Q. Have you been in disputes with anybody else in
15 Otter Creek or in Levy County -- well, let's stick with
16 Otter Creek firstly -- other than the three neighborly
17 disputes in which you appear to be the common
18 denominator?

19 A. Please clarify your question.

20 Q. Have you been involved with any other disputes?
21 Have you accused any individuals within Levy County of
22 committing a crime against you?

23 A. Yes.

24 Q. How many people have you accused of committing a
25 crime?

1 A. The former clerk, Mary DeGroot, and the former
2 mayor, Russell Meeks, Sr.

3 Q. And what crimes have you alleged that they
4 committed?

5 A. Theft.

6 Q. Theft of what?

7 A. Money.

8 Q. From whom?

9 A. Myself.

10 Q. And what money did they steal from you?

11 A. The targeted me as I moved into Otter Creek and
12 they charged me more than double than what they charged
13 every other resident in Otter Creek for water.

14 Q. And how much money -- additional money did they
15 charge you? What's the exact dollar amount?

16 A. Everybody else was paying 22.50 and they charged
17 me 50 a month.

18 Q. So it would be an extra 27.50 a month?

19 A. 27.50 is the right amount.

20 Q. And so are you alleging that Ms. DeGroot -- I'm
21 sorry -- Mary -- what was her last name?

22 A. DeGroot.

23 Q. DeGroot. They're both DeGroot? What's Russell's
24 last name?

25 A. Meeks.

1 Q. Meeks. I'm sorry. I mistyped that. Are you
2 alleging that Ms. DeGroot and Mr. Meeks both personally
3 stole from you?

4 A. Can you clarify your question?

5 Q. Are you alleging that they both personally stole
6 from you in their individual capacity or that through
7 their official capacity --

8 A. That clarifies it. Through their official
9 capacity with the town.

10 Q. Have you accused anybody else of committing a
11 crime against you in Levy County?

12 A. Not that I'm aware of, not that I can recall.

13 Q. Did you ever accuse anybody of potentially
14 hitting you with a car?

15 A. Hitting me with a car. Give me a moment.
16 There's been so much craziness in Otter Creek. In Levy
17 County? Can you clarify? Can you restate the question?

18 Q. Have you ever accused anybody in Levy County of
19 hitting you with a car?

20 A. Hitting me with a car. Not that I can recall.

21 Q. Have you ever been hit with a car?

22 A. Can you clarify the question? Can you put more
23 context to the question, please?

24 Q. No, sir. My question for you is, have you ever
25 been hit by a car?

1 A. Yes, I've been hit by a car.

2 Q. How many times?

3 A. Well, I recall once in Wooster, Ohio. Again, I'm
4 going to ask for clarification. Are you asking if I've
5 been hit by a car while I've been in a car or are you
6 asking was I hit by a car and I was out of a car and I
7 was a pedestrian? Can you please clarify in context?

8 Q. Have you ever been contacted by a vehicle against
9 your will or without your permission when you were not
10 in a vehicle yourself?

11 A. So a pedestrian.

12 Q. I asked the question, sir. I'd ask you to answer
13 it.

14 MR. SHOCHET: Let the record reflect that he's
15 asking for clarification.

16 Q. Have you ever been contacted by a car against
17 your will or without your consent when you were not in
18 a vehicle yourself?

19 A. Yes.

20 Q. On how many occasions?

21 A. Once that I can recall in Wooster, Ohio. And I
22 cannot recall anything currently in Levy County,
23 although Levy County has been so crazy, it's very
24 difficult to recall everything that has happened in
25 Levy County.

1 Q. When you say Levy County has been so crazy, to
2 what are you referring other than the three neighborly
3 disputes that you've described and the water bill
4 dispute that you've described?

5 A. I purchased property in Levy County. I purchased
6 property and it's sold to me illegally with undisclosed
7 encroachments.

8 So dispute with neighbor number one is they
9 dumped all over probably four acres. They turned four
10 acres of my property into a dump. That's the dispute
11 with Susie, "Please remove your dump, get all of your
12 dump off of here." And there's an entire dispute as
13 there's an encroachment.

14 Dispute number two is with Bryan and Tina who
15 sold me the property, which they have an illegal
16 encroachment. So then when I get a survey and I find
17 the actual property lines, Bryan comes over drunk and
18 he takes one of my fence posts and he carves a middle
19 finger flicking me off, because he's mad because he
20 doesn't own all the property that he thought he owned
21 because I got a survey. They sold the property to me
22 illegally because they didn't disclose the known
23 encroachments.

24 So neighbor number one was Susie, four acres of
25 a dump, and the house was built on the property line,

1 which I had a dispute with them to remove everything to
2 protect the property, put fences up. Dispute number
3 two was with Bryan and Tina who sold the property, and
4 he comes over, trespass, and then he destroys my own
5 property. I did not press charges. I put a fence up.

6 Then I'm stolen from. I'm targeted as a
7 northerner in an interracial relationship in Otter
8 Creek. I'm targeted, I'm stolen from. So now all of
9 a sudden here's a northerner, he comes in, we're going
10 to bill him over twice what everybody else pays, even
11 though there's commercial and there's residential
12 properties, but every commercial and residential
13 property pays the exact same thing except for Jeremy
14 Hales.

15 Now I have to fight the corruption within the
16 town hall of a town of less than a hundred people. I've
17 got drug deals going on over on the corner, over at
18 Susie's, which is a part of the dispute. Drugs are
19 literally being sold on my property, which is a dispute
20 in Otter Creek.

21 Then I'm stalked to Otter Creek and I'm begged
22 for for money and for a promotion on a platform, What
23 The Hales. Then those same individuals start to attack
24 us online and the entire town while I'm buying other
25 properties. It goes on and on and on. I've never

1 experienced anything like this in my life. It's been
2 absolutely crazy.

3 Q. Did you hear the question I asked you, sir?

4 A. You asked what has happened to me in Levy County.
5 I gave you the answer.

6 Q. What I asked you, sir, was other than the three
7 neighborly disputes and the water bill dispute were the
8 reasons that you described Levy County as being crazy.
9 So you partially answered it, I think. You said there
10 was something about drugs deals.

11 So we've got the neighborly disputes, we've the
12 water bill dispute, we've got the drug deals.

13 A. Got guns being pulled out on me by John Crook.
14 Let's emphasize that as well. I've got a firearm being
15 pulled out on me and I'm not the only individual or
16 resident in Otter Creek that he's done that to. I've
17 got drugs deals going on on my property.

18 Q. Why are you still here?

19 A. I've got -- I've got -- I've got the aspect of
20 trying to get records from town hall, they refused them,
21 so that I can figure out why in the world they're trying
22 to steal from me.

23 Q. So you've got property illegally sold to you
24 that another neighbor is dumping on, with drug deals
25 occurring on the property, the town won't do anything

1 about. You've got corruption in the local government by
2 overcharging you by \$27 for water. You've got records
3 disputes. You've got somebody pointing guns at you.

4 Assuming all of that is true, why are you still
5 here?

6 MR. SHOCHET: Objection to form.

7 A. I've got your client saying she's going to nail
8 me to a cross, she's going to pop a cap in me. That's
9 your client verbatim per her post, she's going to pop a
10 cap in me. Why am I still here? Because there's a
11 beautiful town of Otter Creek with precious people who
12 need help and that's part of what I love to do. I love
13 to help people.

14 Q. What is the population of Otter Creek?

15 A. I don't know.

16 Q. Can you estimate it?

17 A. A hundred. It goes up and down, it fluctuates.

18 Q. So maybe 95 sometimes, maybe 105 sometimes, but
19 about average a hundred?

20 A. Yeah.

21 Q. How many people out of those hundred have you not
22 had a dispute with yet?

23 MR. SHOCHET: Objection to form.

24 A. Every other one.

25 Q. Well, we've described Ms. Preston --

1 A. You got Ms. Preston and John Crook, who stalked
2 me and followed me to Otter Creek for my money. So
3 there you got that. You got Bryan and Tina who sold me
4 the property. You got Susie who created the dump and
5 built a house on the property line. And then you got
6 town hall, Mary and Russell. I have not had any issues
7 with anybody else.

8 As a matter of fact, I mean I just hosted -- I
9 just hosted Christmas in the Creek where we invited
10 every child in Levy County to come and get free
11 Christmas gifts, and 25 percent of the residents came
12 and volunteered for that event, no issues with them at
13 all.

14 Q. Have you ever described Ms. Preston or Mr. Cook
15 as a pig?

16 A. Not to my recollection. I don't remember. But
17 if I did, first amendment right, it's my opinion. And
18 frankly, I do think he's a pig. The man literally
19 posted he has pictures of Martha with his cock in her
20 mouth. I've got some other words for him as well, a
21 little bit different than pig.

22 Q. Your attorney in our last hearing spoke of a
23 handwriting expert. Do you intend or do you anticipate
24 that you may call a handwriting expert as a witness at
25 the hearing in this case?

1 A. Yes.

2 Q. And to what do you expect the handwriting expert
3 to testify to?

4 A. Lynette Preston created -- wrote signs, posted
5 them in Otter Creek, saying that Jeremy Hales is a
6 rapist.

7 Q. I'm not asking you for a legal conclusion or
8 opinion. But why do you in your lay opinion believe
9 that that's relevant in any way to this case?

10 MR. SHOCHET: Objection to form. You can answer
11 if you understand the question.

12 A. I think it's absolutely relevant in showing that
13 your client is a pathological, habitual liar, as she has
14 stated she's never seen the signs. As a matter of fact,
15 in today's video you're going to see her whisper, "I've
16 never seen the signs." She whispers to both of you.
17 And yet a handwriting expert is stating that 100 percent
18 it is her handwriting.

19 So from the onset, it's going to prove that she
20 is a pathological liar.

21 Q. Have you ever lied?

22 A. Yes.

23 Q. Have you ever lied about anything in this case?

24 A. No.

25 Q. About what have you lied in the past?

1 A. I can't recall. But I'd be lying if I told you
2 I haven't.

3 Q. Do you anticipate that the handwriting expert
4 will testify to anything other than these signs that you
5 claim Ms. Preston wrote?

6 MR. SHOCHET: Form.

7 A. I don't know.

8 Q. Are there any other materials other than these
9 signs that you have asked the handwriting expert to
10 evaluate?

11 A. Yes.

12 Q. And obviously things that Ms. Preston wrote in
13 the court files by way of comparison.

14 A. Yes.

15 Q. And what are those things?

16 A. Motions that she's filed.

17 Q. Right. So what I mean by not things that she's
18 filed that you're using as kind of the source for
19 handwriting analysis to compare something to, but you
20 talked about the signs. Any other things that you were
21 going to ask this hand -- or you have asked the hand-
22 writing expert to compare to Ms. Preston's written
23 documents in the court file?

24 MR. SHOCHET: Objection to form. You can answer
25 when I say that.

1 A. I don't recall everything we provided her.

2 Q. How much have you paid her?

3 A. Too much.

4 Q. How much have you paid her, sir?

5 A. I don't even recall that.

6 Q. Can you estimate it?

7 A. The report --

8 MR. SHOCHET: No, I can't answer, but I'm really
9 not sure either.

10 A. Jeez, I'm not sure either. I mean, it's upwards
11 of \$20,000.

12 Q. How much have you paid Mr. Shochet to date?

13 A. That I don't know either.

14 Q. How much have you paid Mr. Feather to date?

15 A. Seven thousand five hundred dollars.

16 Q. You make repeated reference in your videos on
17 YouTube recently that you have paid between 75 and
18 \$80,000 in legal fees.

19 A. It's over 80,000 now.

20 Q. To whom have you made those payments?

21 A. To my lawyer in Ohio, to Mr. Shochet, to Mr.
22 Feather, also to the handwriting expert.

23 Q. Have you contacted any of Ms. Preston's family?
24 And by family, I mean anybody presently or formerly
25 related to her by blood or marriage.

1 A. I've never contacted anybody in regards to Ms.
2 Preston, though they have contacted me and continue to
3 do so.

4 Q. Who are those individuals?

5 A. I can't tell you the names off the top of my
6 head.

7 Q. What are their relationships to her?

8 A. Daughters -- daughters, step-daughters, the
9 child's legal family members, aunts, grandmother,
10 step-sons, grandchildren.

11 Q. Do you anticipate -- well, do you believe that
12 any of those may be witnesses in this hearing on March
13 1st?

14 MR. SHOCHET: Just say if you know.

15 A. Yes.

16 Q. Which ones?

17 A. Again, I don't know their names off the top of
18 my head.

19 Q. What subject matter would you expect these people
20 to testify about?

21 MR. SHOCHET: Objection to form.

22 THE WITNESS: Go ahead?

23 MR. SHOCHET: You can answer.

24 A. Her lifestyle of lying and abuse of children.
25 And if I may be frank, Mr. Silverman -- and I hope this

1 isn't inappropriate -- but as I look at her lifestyle
2 and I've seen her lifestyle online, as she's posted
3 everything, when she does not get her way, when a person
4 does not do what she wants them to do, she starts with
5 attacks. And the attacks first off are she's a victim
6 and you're an abuser, and then the attacks go into gross
7 sexual attacks against children.

8 And I share this with you because of my concern
9 for you -- and I truly mean this for both of you, that
10 I believe and it's my bias and what I believe -- if she
11 doesn't get what she wants from you guys, I think you're
12 next on the list. And I just -- from what I've seen in
13 her history and what she's done, I want to caution you,
14 because I don't want to see anything happen to you guys
15 either.

16 Q. You have concern for me and for my staff in the
17 same manner that you have concern for Ms. Preston and
18 Mr. Cook and their child?

19 A. My concern is, are there going to be signs that
20 say Joshua Silverman is a rapist? Jeremy Hales is now
21 being called a rapist, which is completely and totally
22 false, and who's the next -- who's the next person that
23 is attacked. That's my concern.

24 Q. Why are you telling me this?

25 A. Because I'm truly concerned for you.

1 Q. Why are you concerned for me?

2 A. Because of what has happened to myself and others
3 through this individual.

4 Q. Why did you not file in the state of Florida for
5 a protection order or injunction against Ms. Preston and
6 Mr. Cook?

7 A. I did.

8 Q. Was it denied?

9 A. Yes.

10 Q. Denied by Judge DeThomasis?

11 A. Yes, which I believe is another reason for bias.

12 Q. That he previously ruled against you in a case?

13 A. That he denied the protection order when I
14 already have Ohio civil protection orders. I believe
15 it should just carry straight over into Florida and he
16 should go -- (snaps fingers) -- injunction. Again,
17 that's my belief.

18 Q. But you filed in Ohio first?

19 A. No. I actually attempted in Florida first.

20 Q. All right. So you filed in Florida and that was
21 denied?

22 A. I attempted to file in Florida. That did not
23 happen. I filed in Ohio and then I filed in Florida.

24 Q. Explain that to me. What do you mean, you
25 attempted to file in Florida?

1 A. Your client was given a cease and desist in May
2 in 2023. None of this was ever broadcasted. None of
3 this was ever shared. Your client completely and
4 totally ignored that cease and desist and, as a matter
5 of fact, actually ramped up her activity of the things
6 she was saying and doing, which then as I leave Florida
7 there are Jeremy Hales is an Ohio rapist signs all over
8 Otter Creek while I'm gone, ramps it up even more.

9 So I went to my attorney, who actually gave her
10 the cease and desist.

11 MR. SHOCHET: Don't discuss what your attorney
12 said.

13 THE WITNESS: That's right.

14 MR. SHOCHET: But you can continue, not to
15 discuss what your attorney said to you. You can
16 answer without discussing --

17 THE WITNESS: What the attorney said.

18 MR. SHOCHET: Yeah.

19 THE WITNESS: Okay.

20 Q. This would be easier if you actually listened to
21 the questions I ask you, sir. My question to you was,
22 what do you mean by you tried to file in Florida before
23 Ohio? I'm not asking you for all the facts and
24 circumstances that caused you to file. I'm asking you
25 just to describe to me what you mean by you tried to

1 file and it didn't happen or didn't work.

2 A. I wanted to file and I was told that -- I can't
3 say that.

4 Q. Did you actually file injunction paperwork?

5 A. I have filed injunctions in Florida, yes, but it
6 was after Ohio.

7 Q. All right. So you did not actually file an
8 injunction -- a petition for injunction in Florida
9 before you filed for your protection order in Ohio?

10 A. Wanted to, I was told I could not.

11 Q. And then you filed in Ohio and obtained a civil
12 protection order in Ohio?

13 A. Correct.

14 Q. And after that you filed for an injunction in the
15 state of Florida?

16 A. Correct.

17 Q. And that was denied?

18 A. Correct.

19 Q. Are there currently contempt proceedings pending
20 against Ms. Preston in the state of Ohio?

21 A. Can you clarify the question?

22 Q. Are there currently contempt proceedings pending
23 in the state of Ohio against Ms. Preston?

24 MR. SHOCHET: Objection to form. You can answer.

25 A. If you're asking is there an upcoming hearing --

1 I'm trying to clarify what you're asking. Are you
2 asking is there an upcoming hearing or are you asking
3 has a decision been made?

4 Q. I'm asking you if there are contempt proceedings
5 currently pending in the state of Ohio against Ms.
6 Preston.

7 MR. SHOCHET: Same objection.

8 A. Please clarify.

9 Q. Are you seeking to have Ms. Preston held in
10 contempt in the state of Ohio?

11 MR. SHOCHET: Same objection.

12 A. Please clarify.

13 Q. Have you alleged in any court proceeding that is
14 currently pending in the state of Ohio that Ms. Preston
15 has violated the civil protection order?

16 A. Yes.

17 Q. And how did she allegedly violate the civil
18 protection order?

19 A. She's breached the 500 foot and the ten foot
20 and -- I'll have to go back to all the evidence. I
21 mean, there's just so much. But she's broken the
22 aspects of -- all the aspects of the civil protection
23 order.

24 Q. And what remedy are you asking for as part of
25 that?

1 A. We're asking for all firearms to be taken away.
2 We're asking for increase of the civil protection order.
3 We've asking for sanctions.

4 Q. What sanctions?

5 MR. SHOCHET: Form. And if you have to rely on
6 your conversations with your Ohio lawyer, I would
7 instruct you not to tell -- not to reveal those
8 conversations.

9 A. Sorry. I won't be able to answer.

10 Q. Has your attorney in Ohio filed a motion or some
11 type of pleading in court in Ohio to initiate contempt
12 proceedings against Ms. Preston?

13 MR. SHOCHET: Form. You can answer.

14 A. It's already happened. A hearing has happened.

15 Q. And what were the sanctions that were requested
16 in that pleading?

17 MR. SHOCHET: Form. If you know.

18 A. Legal fees.

19 Q. So you're not asking for any remedy other than
20 legal fees?

21 MR. SHOCHET: Form.

22 A. I can't recall.

23 Q. Do you believe that Ms. Preston ought to be
24 incarcerated?

25 A. It's for a judge to decide, not for me.

1 Q. My question for you is not who gets to make the
2 decision. My question is whether you, Jeremy Hales,
3 personally believe that Ms. Preston ought to be
4 incarcerated for alleged violations of the civil
5 protection order from the state of Ohio.

6 A. My answer to you is it's not for me to decide.
7 It's for a judge to decide.

8 Q. Have you discussed the potential testimony of
9 the handwriting expert in the presence of Ms. Rizk?

10 A. I've discussed with a camera.

11 Q. Was Ms. Rizk present?

12 A. Yes.

13 Q. Do you own firearms?

14 A. Yes.

15 Q. What firearms do you own?

16 A. Don't know.

17 Q. How many firearms do you own?

18 A. Don't know that either.

19 Q. Can you approximate for me how many firearms you
20 own?

21 A. I would guess anywhere between 10 and 15.

22 Q. Where are those firearms stored?

23 A. I don't know.

24 Q. How is it you don't know where 10 to 15 firearms
25 are stored?

1 A. They've all been removed from my presence so that
2 I would not know.

3 Q. Removed by whom?

4 A. That I don't know either.

5 Q. Ten to 15 firearms simply disappeared from your
6 home?

7 A. Yeah, they're gone.

8 Q. Okay. Can you describe the circumstances under
9 which they are now gone from your home?

10 A. Please clarify your question.

11 Q. Did somebody come pick them up?

12 A. Yes, somebody had to have.

13 Q. Okay. Are you alleging that they were stolen?

14 A. No.

15 Q. Are you alleging that somebody improperly took
16 them?

17 A. No.

18 Q. Were you present when the firearms were removed
19 from your home?

20 A. No.

21 Q. Do you know who was present when the firearms
22 were removed from your home?

23 A. No.

24 Q. Can anybody walk into your home?

25 A. No.

1 Q. Who has access to your home other than you and
2 Ms. Rizk?

3 A. An employee, Dionna West.

4 Q. Okay. Do you know whether Ms. West was present
5 when the firearms were removed from your home?

6 A. I don't know exactly who was present. I was not
7 there when the firearms were removed.

8 Q. Do you have any firearms in your possession or
9 control right now?

10 A. No.

11 Q. Does Ms. Rizk?

12 A. No.

13 Q. Do you believe that Ms. Preston has an obligation
14 to pay any of your legal fees in this case?

15 A. Yes.

16 Q. On what are you basing that?

17 A. Frivolous accusations, lies.

18 Q. Do you believe that I have an obligation to pay
19 any of your legal fees in this case?

20 A. If the court finds as such, yes.

21 MR. SILVERMAN: Can we go off the record for
22 five minutes?

23 MR. SHOCHET: Sure.

24 THE VIDEOGRAPHER: All right. 11:32 a.m., we
25 are off the record.

1 (Thereupon, a brief recess was taken.)

2 THE VIDEOGRAPHER: All right. It's 11:40 a.m.
3 We are on the record.

4 MR. SHOCHET: Okay.

5 MR. SILVERMAN: At this time I don't have any
6 further questions for Mr. Hales, but we are not
7 concluding this deposition, nor at this time I'm not
8 going to ask him whether he wishes to read or waive.

9 We have questions that have been subject to a
10 motion pursuant to Rule 12.301(d) that must be
11 resolved by the court. So until such time as those
12 are resolved, we will suspend this examination and
13 reconvene, if appropriate, at a later date.

14 I certainly understand, Mr. Shochet, that you
15 have the right to cross examination. But as I have
16 not yet concluded my direct examination, I don't
17 believe it's appropriate to begin your cross
18 examination until the judge has ruled upon the
19 pending motions.

20 So we will recess the deposition at this time,
21 to be reconvened once the court has addressed the
22 pending motions.

23 MR. SHOCHET: Well, hold on. I'm going to ask
24 you, do you have any other questions if the objection
25 is -- any other questions -- any other areas of

1 inquiry other than the ones that have been objected
2 to?

3 MR. SILVERMAN: I have just indicated I do not.

4 MR. SHOCHET: Okay. Then we'll see you later.
5 Have a nice weekend.

6 MR. SILVERMAN: Thank you.

7 THE VIDEOGRAPHER: 11:42 a.m., and we are off
8 the record.

9 (Thereupon, the witness was excused and the
10 deposition was adjourned at 11:42 a.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA:

COUNTY OF ALACHUA:

I, the undersigned authority, certify that
the witness, JEREMY B. HALES, personally appeared before
me and was duly sworn.

WITNESS my hand and official seal this 11th
day of October, 2024.



Rhonda D. Mashburn

Rhonda D. Mashburn
Notary Public - State of Florida
Commission No. HH 270845
Expires: June 4, 2026
Bonded through Troy Fain Insurance

Personally Known:
OR Produced Identification: XX
Type of ID Produced: OH DL

REPORTER'S DEPOSITION CERTIFICATE

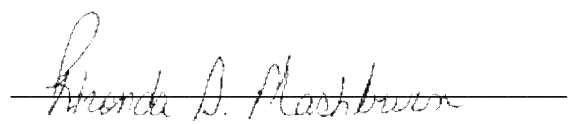
STATE OF FLORIDA:

COUNTY OF ALACHUA:

I, Rhonda D. Mashburn, Court Reporter and Notary Public, certify that I was authorized to and did stenographically report the deposition of JEREMY B. HALES; that a review of the transcript was neither requested or not requested; and that the transcript is a true and complete record of my stenographic notes.

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' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 11th day of October, 2024.

A handwritten signature in cursive script, reading "Rhonda D. Mashburn", is written over a horizontal line.

Rhonda D. Mashburn

Court Reporter/Notary Public