

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF FLORIDA
3 - - -
4 JEREMY B. HALES,) CIVIL DIVISION
5))
6 Plaintiff,) NO. 1:24-CV-00045-AW-ZCB
7))
8 -VS-))
9))
10))
11 LYNETTE MICHELLE LACEY,)
12 ALEXIS PRESTON, and)
13 JOHN COOK,)
14))
15 Defendants.)
16))
17))
18 - - -
19
20
21
22

12 REMOTE DEPOSITION OF JEREMY B.
13 HALES, located in Trenton, Florida, commencing
14 at 10:12 A.M. EST on Monday, December 2, 2024,
15 before ALYSSA A. REPSIK, Court Reporter and
16 Notary Public in and for the Commonwealth of
17 Pennsylvania.
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1 P R O C E E D I N G S

2 THE REPORTER: The attorneys
3 participating in this deposition acknowledge
4 that I am not physically present in the
5 deposition room and that I will be reporting
6 this deposition remotely.

7 They further acknowledge that, in
8 lieu of an oath administered in person, the
9 witness will verbally declare his testimony in
10 this matter under penalty of perjury.

11 The parties and their counsel
12 consent to this arrangement and waive any
13 objections to this manner of reporting.

14 Please indicate your agreement by
15 stating your name and your agreement on the
16 record.

17 ATTORNEY SHOCHET: Randy
18 Shochet, Shochet Law Group in Trenton, Florida,
19 and we stipulate.

20 ATTORNEY MATZKIN: Bruce
21 Matzkin for Defendants' Michelle Preston and
22 John Cook. We stipulate.

23 JEREMY B. HALES, a Plaintiff herein,
24 having been first duly sworn, was examined and
25 testified as follows:

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1 EXAMINATION

2 BY ATTORNEY MATZKIN:

3 Q. Good morning, Mr. Hales. Let me
4 just go through a couple of ground rules, then
5 we'll get started.

6 So all objections are reserved until
7 the time of trial except to the form of the
8 question. That means although your client --
9 your counsel may object or you may object or
10 have an objection, you must still answer the

11 question unless you're instructed not to by
12 your counsel due to privilege or other valid
13 reason.

14 If you don't understand the
15 question, please let me know. I will try to
16 rephrase it. If you answer the question, I
17 will assume you've understood it.

18 You can ask for a break at any time
19 except when there's an unanswered question
20 pending.

21 Do you have any questions about
22 those ground rules?

23 A. No.

24 ATTORNEY SHOCHET: Well, I'm
25 going to -- I'm going to have a little

↑

Page 6

1 instruction here.

2 So, Jeremy, on that point, if I say
3 "objection," such as -- in this deposition I
4 may say, "Objection, totally irrelevant," or
5 "not relevant," "relevance." It's preserved
6 for the court.

7 If he tries to introduce irrelevant

8 material, for example, the objection will be
9 heard. You still need to answer the question,
10 okay.

11 However, if he tries to -- and I
12 hope he won't -- involve -- ask questions that
13 involve discussions that you and I have had in
14 private, that's very improper. I think he
15 knows better than that. But I will instruct
16 you not to answer. So unless I say that,
17 answer.

18 Okay?

19 BY ATTORNEY MATZKIN:

20 Q. All right. So I'd like to begin
21 with Exhibit 77.

22 (Deposition Exhibit No. 77 was
23 marked for identification.)

24 ATTORNEY SHOCHET: Oh. Okay.
25 You've got to hold on. You're not going to

↑

Page 7

1 pull it up; is that right?

2 ATTORNEY MATZKIN: Well,
3 again, you can pull it up, and I'll pull it up.

4 ATTORNEY SHOCHET: Wait a

5 minute. Did you add something to the drive,
6 sir?

7 ATTORNEY MATZKIN: There's 78
8 exhibits.

9 ATTORNEY SHOCHET: Okay.
10 We'll go back to your drive. Okay. Okay. Go
11 ahead. It's up on our screen.

12 BY ATTORNEY MATZKIN:

13 Q. Do you recognize Exhibit 77,
14 Mr. Hales?

15 ATTORNEY SHOCHET: We're
16 scrolling, just so you know.

17 THE WITNESS: Yes.

18 BY ATTORNEY MATZKIN:

19 Q. What is that?

20 A. That is a motion.

21 Q. Exhibit 77?

22 A. A Complaint.

23 Q. Is that the --

24 A. United States District Court, the
25 Northern District of Florida.

↑

Page 8

1 Q. Is that the Court Complaint you

2 filed in this case?

3 A. That is the Court Complaint that my
4 lawyer filed on behalf of me in this case.

5 Q. Okay. You're alleging that my
6 clients defamed you and tortiously interfered
7 with your business; is that correct?

8 ATTORNEY SHOCHET: Objection
9 to form. Compound question.

10 You can answer.

11 ATTORNEY MATZKIN: Strike
12 that.

13 BY ATTORNEY MATZKIN:

14 Q. Among your claims is that my
15 client's defamed you; correct?

16 A. Yes.

17 Q. And separately, on separate
18 accounts, you've alleged my clients tortiously
19 interfered with your business; correct?

20 A. Yes.

21 Q. And you allege that they committed
22 extortion directed at you; correct?

23 ATTORNEY SHOCHET: Form.

24 You can answer.

25 THE WITNESS: Yes.



1 BY ATTORNEY MATZKIN:

2 Q. Okay. If you look at
3 Paragraph 30 -- strike that -- Paragraph 25 of
4 the complaint, do you see that?

5 A. Yes.

6 Q. Okay. It says, "Preston and Cook
7 immediately began publishing defamatory
8 statements about Hales on their social media
9 platforms. In May 2023, for example, Preston
10 stated on her social media that she 'watched
11 Jeremy Hales videos until recently,' and
12 'Jeremy Hales only thinks about the size of his
13 junk.'"

14 Did I read that accurately?

15 A. Yes.

16 Q. Okay. Are you claiming that this
17 first quoted statement constitutes
18 defamation --

19 ATTORNEY SHOCHET: Objection.

20 BY ATTORNEY MATZKIN:

21 Q. "Watched Jeremy Hales videos until
22 recently"?

23 ATTORNEY SHOCHET: Objection

24 to form. Calls for a legal conclusion. Also,
25 competency is an issue.

↑

Page 10

1 But you can answer, if you can.

2 BY ATTORNEY MATZKIN:

3 Q. Do you understand my question?

4 A. Ask the question again, please.

5 Q. Yes. Are you claiming that the
6 quoted statement, "watched Jeremy Hales' videos
7 until recently," is defamatory to you?

8 A. I'm claiming that Paragraph No. 25
9 is a portion of the entirety of the Complaint
10 that was presented to the Court. That's what
11 I'm claiming.

12 Q. Okay. So I'm going to ask you again
13 the same question so I can --

14 A. I'm going to answer it again the
15 same way. Paragraph No. 25 is a portion of the
16 entirety of the Complaint that was presented to
17 the Court.

18 Q. Is the statement by Ms. Preston that
19 she "watched Jeremy Hales' videos until
20 recently" alleged by you to be a false

21 statement?

22 ATTORNEY SHOCHET: Hold on.

23 Alleged to be a false statement?

24 BY ATTORNEY MATZKIN:

25 Q. My question is: Are you claiming

↑

Page 11

1 that Ms. Preston's statement that you quote
2 here -- that she "watched Jeremy Hales' videos
3 until recently" -- is a false statement?

4 Are you claiming that's a false
5 statement?

6 ATTORNEY SHOCHET: Objection
7 to form.

8 If you understand the question.

9 THE WITNESS: I don't
10 understand the question.

11 ATTORNEY SHOCHET: Well, his
12 instructions are that if you don't understand,
13 you can ask him to amplify or explain.

14 BY ATTORNEY MATZKIN:

15 Q. I'll rephrase it.

16 You wrote in this Complaint -- this
17 Complaint states in Paragraph 25 that "Preston

18 and Cook began publishing defamatory statements
19 on their social media platforms," and then,
20 "For example," as you -- your Complaint says,
21 "for example she stated 'she watched Jeremy
22 Hales videos until recently.'"

23 So you you've given an example of a
24 publication of a defamatory statement. So my
25 question is: Is it your allegation that that

↑

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1 quoted statement is a false statement?

2 ATTORNEY SHOCHET: Form.

3 Do you understand the question?

4 BY ATTORNEY MATZKIN:

5 Q. You can answer the question,
6 Mr. Hales. Is that a false statement?

7 A. Paragraph 25 is part of an entirety
8 of a Complaint that was committed to the Court.

9 Q. How does the statement that
10 Ms. Preston watched Jeremy Hales' videos until
11 recently harm you in any way?

12 A. Again, that is a portion of an
13 entirety of a paragraph which is a portion of
14 the totality of the Complaint submitted to the

15 Court.

16 Q. Okay. But you said "For example" of
17 a defamatory statement published on social
18 media and gave that as an example.

19 So my question is: How is that an
20 example of a defamatory statement?

21 ATTORNEY SHOCHET: Objection

22 to form. Calls for a legal conclusion. And

23 now that's the second time I've raised that

24 objection, and we're going to -- if you ask

25 that question again, it's going to get the same



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1 objection. It's a competency issue.

2 ATTORNEY MATZKIN: I rephrased

3 it. I said, "How is the statement 'watched

4 Jeremy Hales' videos until recently' a

5 defamatory statement" as stated in Paragraph

6 25?

7 ATTORNEY SHOCHET: Objection.

8 Competency. He's not a lawyer. If you want to

9 ask him as a lay opinion, that's fine.

10 ATTORNEY MATZKIN: Well, I ask

11 -- I'll ask again.

12 BY ATTORNEY MATZKIN:

13 Q. Are you claiming it's a false
14 statement which is an element of defamation?

15 A. Well, in all reality, let's talk
16 about false statements. Who knows what your
17 client actually says was true or false
18 considering under oath she has stated she has
19 only watched, what, two, three, maybe four
20 videos of What the Hales, but then she's
21 posting all over the internet that she's
22 watched all the videos until recently? What is
23 the truth? What's false? You tell me. She's
24 your client.

25 ATTORNEY MATZKIN: Well, we'll

↑

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1 of course strike that.

2 Please place on the record that I
3 move to strike that entire tirade.

4 ATTORNEY SHOCHET: You don't
5 have the power to strike anything. You can say
6 "move to strike." That's fine. But you cannot
7 say something is going to be stricken.

8 ATTORNEY MATZKIN: Just

9 strike.

10 BY ATTORNEY MATZKIN:

11 Q. And let's move on to the next --

12 ATTORNEY SHOCHET: It's not
13 stricken.

14 BY ATTORNEY MATZKIN:

15 Q. Let's move on to the next quoted
16 statement that Paragraph 25 offers as an
17 example of defamatory statements about Hales on
18 their social media platforms.

19 "Jeremy Hales only thinks about the
20 size of his junk."

21 Is it your claim that that's a
22 defamatory statement?

23 ATTORNEY SHOCHET: Same

24 objection. If you're asking his lay opinion,

25 that's fine.

↑

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1 To save time, every time that you

2 raise legal terminology to this nonlawyer, I'm

3 just going to say "Objection to form," but

4 that's what I mean, Counsel. He's not

5 competent. He's not a lawyer. But if you want

6 to ask him --

7 BY ATTORNEY MATZKIN:

8 Q. Mr. Hales, do you understand --

9 ATTORNEY SHOCHET: -- his lay

10 opinion, that's fine. Go ahead. You can

11 answer, if you understand the question.

12 BY ATTORNEY MATZKIN:

13 Q. Mr. Hales, do you understand what
14 defamation is?

15 A. Yes, I do.

16 Q. Okay. What -- just give me your lay
17 understanding of it.

18 A. Defamation are things that are
19 untrue, that damage the character and the
20 association with that individual.

21 Q. Which is --

22 A. Such as taking and placing signs
23 along in a town where that individual lives
24 that states that "Oh, Jeremy Hales, the Ohio
25 rapist, raped my child." Defamation.

↑

Page 16

1 Q. Okay. So you're -- you said

2 "things," but you meant statements that are

3 untrue, that harm someone's reputation; is that
4 accurate?

5 Your understanding of defamation is,
6 "statements that are untrue, that harm
7 someone's reputation"?

8 A. Untrue. False.

9 Q. Got you. False. Statements that
10 are false, that harm someone's reputation;
11 correct?

12 Mr. Hales --

13 A. Please repeat your question.

14 Q. Mr. Hales, is it your understanding
15 that defamation are statements that are false,
16 that harm someone's reputation?

17 A. Yes.

18 Q. All right. Is "Jeremy Hales only
19 thinks about the size of his junk" a statement
20 that is false that harms your reputation?

21 A. No. 1, it is false. No. 2, a judge
22 or a jury will decide whether it's defamation
23 or not. I won't be the one deciding those
24 things.

25 Q. Okay. But you're alleging that that



1 harmed your reputation?

2 A. A jury and a judge or a judge or a
3 jury or both will decide whether that's
4 defamation or not.

5 Q. I understand. And are you alleging
6 that that harmed your reputation?

7 A. I'm alleging that your clients have
8 harmed my reputation in horrific ways.

9 Q. Okay. But I'm asking you about this
10 particular statement, "Jeremy Hales only thinks
11 about the size of his junk."

12 Is that a false statement that harms
13 your reputation?

14 A. Yes, it is a false statement.

15 Q. And how does it harm your
16 reputation?

17 A. That will be determined by a judge
18 or a jury.

19 Q. Okay. But how do you allege that it
20 harmed your reputation?

21 A. That will be determined by a judge
22 or a jury.

23 Q. No. A judge and a jury doesn't
24 determine what you allege. They determine

25 what's true.



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1 So I'm asking you what you're

2 alleging?

3 ATTORNEY SHOCHET: You're

4 asking him to rephrase? I'm not -- objection

5 to form. Compound question. Competency.

6 BY ATTORNEY MATZKIN:

7 Q. Well, again, you know, you say that
8 as an example of a defamatory statement, which
9 you understand to be a false statement that
10 harms someone's reputation, "Jeremy Hales only
11 thinks about the size of his junk."

12 So I'm asking you, how does that
13 harm your reputation?

14 ATTORNEY SHOCHET: Form.

15 BY ATTORNEY MATZKIN:

16 Q. How do you allege that it harms your
17 reputation? What harm do you allege to have
18 suffered by that statement -- by that quoted
19 statement?

20 ATTORNEY SHOCHET: That's
21 three questions. Objection to form. Compound.

22 BY ATTORNEY MATZKIN:

23 Q. All right. So I'll rephrase.

24 What harm do you allege as a result

25 of that statement, "Jeremy only thinks about



Page 19

1 the size of his junk"?

2 A. Correct me if I'm wrong, but the

3 Complaint actually states how it has harmed my

4 reputation, how your clients have harmed my

5 reputation.

6 Q. All right. So you're not going to

7 answer in --

8 A. How they damaged my business. How

9 they damaged my personal life. How they

10 damaged my personal relationships. How they

11 damaged my income. How they damaged every

12 aspect of my life. How they've literally --

13 your client literally stating he's going to

14 shoot me in the face and feed me to the gators.

15 Q. And the list goes on and on.

16 A. Should I go further --

17 Q. I understand.

18 A. -- or do you want more?

19 Q. I understand that. The list goes on
20 and on.

21 Now let's move to Paragraph 27 of
22 the same exhibit.

23 Tell me when you're ready.

24 ATTORNEY SHOCHET: Do you see
25 it?

↑

Page 20

1 THE WITNESS: Yeah. I can see
2 it.

3 BY ATTORNEY MATZKIN:

4 Q. Okay. So can I ask a question about
5 it now?

6 ATTORNEY SHOCHET: You ready?

7 THE WITNESS: Yes. Ready.

8 BY ATTORNEY MATZKIN:

9 Q. Okay. You write that, "In May 2023,
10 Mr. Cook pulled a gun on you as you were
11 driving on the public roadway to enter your
12 property."

13 Is that somehow relevant to
14 defamation, in your view, a false statement
15 that harms yours reputation?

16 ATTORNEY SHOCHET: Objection.

17 Compound question. Also didn't read the entire
18 sentence.

19 BY ATTORNEY MATZKIN:

20 Q. There are three items here, No. 1 --

21 ATTORNEY SHOCHET: First one,
22 you left out "when Hales returned from Ohio for
23 a town meeting."

24 ATTORNEY MATZKIN: Okay.

25 BY ATTORNEY MATZKIN:

↑

Page 21

1 Q. "When Hales returned from Ohio for a
2 town meeting May 2023 Cook pulled a gun on
3 Hales as Hales was driving by on the roadway to
4 enter Hales' own property."

5 Did I read that accurately?

6 A. Yes.

7 Q. And did Mr. Cook say anything to you
8 while he was driving by -- while you were
9 driving by entering your property and he pulled
10 a gun?

11 Did he say anything to you?

12 A. He said lots of things. And it's

13 all recorded, and it's all on video, and it's
14 all part of evidence.

15 Q. Is that the video that we're
16 familiar with where you approach the truck he's
17 sitting in with your cell phone and start
18 throwing the epithets?

19 A. You mean the video where he
20 trespassed an my property and threatened to go
21 bang bang on me? Threatened my life yet again?
22 That video? Is that the video you're referring
23 to? Where he trespassed, literally parked on
24 my property? When he literally said that a gun
25 was going to go bang bang? That -- that video?

↑

Page 22

1 Q. Okay.

2 A. Is that the one?

3 Q. The one I'm thinking of -- the one
4 I'm thinking of is when you walk up to it and
5 call him a "Gay effing faggot." Maybe it's the
6 same video.

7 A. Repeating -- repeating what he has
8 called me every single time when you said has
9 he said anything to me, which is on video of

10 him calling me those things.

11 Q. Okay. But that's just you talking
12 about this same video?

13 A. And not only saying that; that he
14 was saying that Martha would be shoving things
15 in my backside. That video. That's the one
16 you're referring to, right, when you're asking
17 does he say anything to me; right?

18 ATTORNEY MATZKIN: Mr.
19 Shochet --

20 ATTORNEY SHOCHET: I think
21 he's -- No. 1 --

22 THE WITNESS: Okay.

23 ATTORNEY SHOCHET: You guys
24 are -- you guys are conflating No. 1 and No.
25 2.

↑

Page 23

1 THE WITNESS: Well, there's so
2 much evidence out there, it's hard to keep it
3 all --

4 ATTORNEY SHOCHET: Well,
5 you're talking about the "go bang." That's in
6 No. 2.

7 THE WITNESS: Okay.

8 ATTORNEY SHOCHET: He's
9 talking -- I think he's talking about No. 1.
10 Those are two separate incidents, Counsel. So
11 it's not -- it's not the video you're referring
12 to.

13 ATTORNEY MATZKIN: Mr.
14 Shochet, let's --

15 ATTORNEY SHOCHET: There's a
16 video of both. A video of both.

17 BY ATTORNEY MATZKIN:

18 Q. Let's move on to Part 3 of
19 Paragraph 27. "Maliciously threatening" --

20 A. We're moving on a lot, don't we?

21 Q. "Maliciously threatened to injure"
22 -- "to do injury to Hales' reputation with
23 intent thereby to extort a pecuniary advantage,
24 and accordingly, publically stated falsely on
25 Facebook that Hales' fiance had oral sex with

↑

Page 24

1 him and that he has photographs to prove it."

2 That's Subpart 3 to Paragraph 27.

3 ATTORNEY SHOCHET: And there's

4 a footnote too, Counsel, which, if you're going
5 to read -- you need to read entire sentences
6 including footnotes.

7 ATTORNEY MATZKIN: All right.
8 Mr. Shochet, I can read or not read as I
9 choose.

10 BY ATTORNEY MATZKIN:

11 Q. So did I just read Subpart 3
12 correctly?

13 A. No. You missed the footnote. So if
14 you're going to read it, read it correctly.

15 Q. I am reading Paragraph 27, Sub 3,
16 "Maliciously threatened to do injury to Hales'
17 reputation with intent thereby to extort a
18 pecuniary advantage, and accordingly,
19 publically stated falsely on Facebook that
20 Hales' fianc e had oral sex with him, and that
21 he has photographs to prove it."

22 Aside from the footnote, did I read
23 that correctly?

24 A. No. You didn't read the footnote.
25 Read the footnote.

↑

1 Q. Mr. Hales, I get to run the
2 deposition, and if you're going to continue and
3 Mr. Shochet is going to continue, then I'll
4 reach a point where we'll end the deposition
5 and bring a Court Motion.

6 So all I'm asking you now is: Did I
7 accurately read what's in Paragraph 27, putting
8 aside the footnote? I put aside the
9 footnote --

10 A. All I am telling you now --

11 Q. So you don't have to --

12 A. -- is that you didn't read it
13 correctly.

14 Q. -- so you don't have to talk about
15 the footnote --

16 A. You forgot the footnote.

17 THE REPORTER: Everyone, stop.

18 ATTORNEY MATZKIN: Just tell
19 me if I asked you right.

20 THE REPORTER: No. Stop.

21 Stop. Stop. Stop.

22 ATTORNEY MATZKIN: In fact,
23 you read it --

24 THE REPORTER: No. Everyone,
25 stop. I'm going to stop this before we

↑

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1 continue with the rest of this deposition. If
2 we continue to talk over each other, we're not
3 going to have a record that anybody is going to
4 be able to read.

5 I need it to be question, pause,
6 answer, or else we're going to have a record
7 that nobody can decipher. Thank you.

8 THE WITNESS: Thank you,
9 Alyssa.

10 BY ATTORNEY MATZKIN:

11 Q. Mr. Hales, please read Sub 3 of
12 Paragraph 27 out loud.

13 A. "Maliciously threatened to do injury
14 to Hales' reputation with intent thereby to
15 extort a pecuniary advantage and accordingly
16 pubically stated falsely on Facebook that
17 Hales' fiance had oral sex with him and that he
18 has photographs to prove it." Footnote --

19 Q. Okay. Now --

20 A. -- "Cook posted 'Jeremy would like
21 me to post'" -- "'Jeremy, would you like me to
22 post the picture of my cock in George's [sic]

23 mouth you can't take this one down.'"

24 Q. Okay. Is it your allegation that

25 that is a defam- -- a false statement that

↑

Page 27

1 harms your reputation?

2 ATTORNEY SHOCHET: Form, as

3 stated before to keep matters short for the

4 reasons stated previously. Same objection.

5 You can answer, if you understand.

6 THE WITNESS: It's clearly

7 stated as false, and a judge or a jury will

8 determine whether it's defamation or not.

9 BY ATTORNEY MATZKIN:

10 Q. Okay. Now, how -- where is the

11 threat to extort pecuniary advantage in that

12 statement?

13 ATTORNEY SHOCHET: Objection.

14 Objection to form.

15 BY ATTORNEY MATZKIN:

16 Q. Do you understand the question?

17 A. A judge and a jury will determine

18 that, not myself as a layman.

19 Q. Okay. But I'm asking you, as you

20 allege "with intent thereby to extort a
21 pecuniary advantage," so tell me where in this
22 statement or anywhere else is there the threat
23 to extort pecuniary advantage?

24 ATTORNEY SHOCHET: Objection

25 to form. You're not reading the entire quote.



Page 28

1 You're leaving the word out "intent."

2 So I don't know why you say it

3 sometimes, you say it other -- sometimes you

4 include it; sometimes you don't. If you're

5 going to refer to a paragraph, I'd ask you to

6 please --

7 ATTORNEY MATZKIN:

8 Mr. Shochet, this is improper of you. I'd ask

9 that you --

10 ATTORNEY SHOCHET: I don't

11 know why, but you keep on -- that's why I'm

12 objecting. You keep on -- the record will

13 reflect this. Sometimes you read a sentence

14 one way. Then sometimes you take things out.

15 So I am just trying to --

16 ATTORNEY MATZKIN:

17 Mr. Shochet --

18 ATTORNEY SHOCHET: Sir, it's

19 your deposition. I'm just trying to help you.

20 I'm done. I'm just going to object every time

21 you do that.

22 So just say compound --

23 ATTORNEY MATZKIN: Mr.

24 Shochet, "Object to the form," and then say

25 nothing more.



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1 ATTORNEY SHOCHET: Okay. Sir,

2 I know the rules. I'm going to object and

3 state the reason every time.

4 BY ATTORNEY MATZKIN:

5 Q. My question is: What about this

6 statement that you just read from Sub 3 and

7 Footnote 2 constitutes a threat to extort

8 pecuniary advantage?

9 From where do you get your

10 allegation that there was an intent to extort a

11 pecuniary advantage?

12 ATTORNEY SHOCHET: Objection

13 to form. It's two questions. Compound.

14 BY ATTORNEY MATZKIN:

15 Q. From where do you get your
16 allegation that that statement was made with
17 intent thereby to extort a pecuniary advantage?

18 A. A judge or jury will decide that,
19 not myself as a layman.

20 Q. Is there a statement that you can
21 point to by Mr. Cook, that demanded pecuniary
22 advantage from you in any form?

23 A. A judge and a jury will determine
24 that, not myself as a layman.

25 Q. I'm asking you to identify a

⬆

Page 30

1 statement -- whether oral or written -- by
2 Mr. Cook to you that you claim was an extortive
3 threat to extort pecuniary advantage?

4 ATTORNEY SHOCHET: Form.

5 BY ATTORNEY MATZKIN:

6 Q. Do you understand the question?

7 A. Myself as a layman will not be
8 determining that. A judge or a jury will be
9 determining that.

10 Q. Is there a statement by Mr. Cook

11 that you allege where he said "Give me

12 something, or else..."?

13 You can fill in --

14 A. Again, I'm a layman.

15 Q. -- you can fill in the "something"

16 or the "or else." Let me repeat.

17 Is there a statement you're alleging

18 by Mr. Cook in which he told you that you had

19 to give him something, anything, or else

20 anything?

21 A. The whole aspect of them stalking

22 me. The whole aspect of them trying to get

23 money from me. The whole aspect of them trying

24 to utilize and take advantage of my giving

25 heart is an aspect of intent to, "Then if you



Page 31

1 don't give it, I'm going to post pictures of my

2 cock in your fianc e's mouth. If you don't

3 give it, I'm going to post signs all over the

4 town where you live that state that you raped

5 my child. If you don't give it I'm going to

6 post things about your fianc e's family being

7 terrorists, and you bought more property for it

8 to be a training ground for terrorists if you
9 don't give us these things," as we saw played
10 out in real life.

11 Q. Okay. So is there any statement --

12 A. And the list can go on and on and on
13 and on.

14 Q. Are you finished?

15 Is there any statement -- not an
16 aspect, but a statement that you can point to,
17 oral or written -- by Mr. Cook in which he said
18 that you have to give him something of
19 pecuniary value, or else he will do something,
20 whether it be post signs, post photos of your
21 fianc e, or anything else?

22 Is there any such statement?

23 ATTORNEY SHOCHET: Compound.

24 Objection to form.

25 BY ATTORNEY MATZKIN:



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1 Q. Do you understand the question?

2 A. Absolutely.

3 Q. Can you answer it?

4 A. Everything stated. All the evidence

5 that you have in your hands is all because they

6 did not get what they wanted from me.

7 Q. Okay. Again, a written or oral

8 statement that you can quote or point to in

9 which Mr. Cook said, "Give me something, or I

10 will do something"?

11 A. Again, everything that you're

12 looking at from the aspect of he's got pictures

13 of his cock in my fianc e's mouth, and I can't

14 take that post down is because they did not get

15 what they wanted from me: Money, fame, and

16 gifts in kind and donations. And the list goes

17 on and on.

18 Q. Okay. Where does it say -- where

19 does the -- where do they say that, Mr. Cook or

20 Ms. Preston ever say that?

21 I understand you believe that, but

22 I'm asking, where do they say in written or

23 oral form?

24 A. It's their intent from the very

25 beginning. Intent. Intent. Malicious.

↑

Page 33

1 "Maliciously threatened to do injury to Hales'

2 reputation with intent."

3 Q. So that was --

4 A. That was the intention from the
5 entire time, to stalk and then to try and get
6 money, to try and get fame. Publicly posting
7 she's going to launch her YouTube at my event
8 "Half Mill, Time to Grill." They're wanting
9 begging for items that I have. Money.
10 Donations.

11 Intent. They didn't get it. Then
12 what happened? This is what happened.

13 Q. So - so there's no statement you can
14 point to -- oral or written -- where they
15 actually say, "We're going to do things unless
16 you give us something"?

17 A. Intent. You mean, like, statements
18 that you have in writing, that you're going to
19 help people grow and fuse if they cover your
20 side of this story like that? Like, things
21 you've done, put in writing claiming that
22 you're a famous lawyer? What a joke. What a
23 joke. You're a famous lawyer. Putting in
24 writing that you're going to guarantee views.
25 Things like you've done?



1 Would you like me to go on? Things
2 like creating an ecosystem, an "Anti-Hales
3 ecosystem" that destroyed somebody's
4 reputation, to destroy their business in
5 writing like you have done. You.

6 ATTORNEY SHOCHET: Let the
7 record reflect Mr. Matzkin is actually smiling
8 at that answer.

9 THE WITNESS: Oh, by the way,
10 there's also that piece of evidence "Give me
11 \$65,000."

12 BY ATTORNEY MATZKIN:

13 Q. Oh.

14 A. Oh, wait. That's in your evidence.
15 We're going to get to it, isn't it?

16 Q. Why don't we go right to Exhibit 1.
17 Tell me when you're able to look at Exhibit 1.

18 ATTORNEY SHOCHET: I've got to
19 get to it. Hold on. I've got to close this
20 one first.

21 THE WITNESS: By the way, Lisa
22 Lee is waiting for your text messages. Oh,
23 wait. That's transcribed, and that's evidence

24 now, too.

25 (Deposition Exhibit No. 1 was marked

↑

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1 for identification.)

2 BY ATTORNEY MATZKIN:

3 Q. So Exhibit 1, are you able to open
4 that?

5 ATTORNEY SHOCHET: Hang on.

6 It's so out of order. I don't know why your
7 exhibits are not numbered correctly. But let
8 me try that.

9 ATTORNEY MATZKIN: They're in
10 order, Exhibit 1 through 78.

11 ATTORNEY SHOCHET: Mine is --
12 this -- your Google Drive, it's out of order.
13 But I can find it. I just got to scroll.

14 ATTORNEY MATZKIN: They're in
15 numerical order.

16 ATTORNEY SHOCHET: Not on my
17 screen they're not.

18 Okay. Do you see that?

19 THE WITNESS: Yeah, I can see
20 it.

21 ATTORNEY SHOCHET: Okay. We
22 have it up, Counsel.

23 BY ATTORNEY MATZKIN:

24 Q. Okay. Is this a -- what appears to
25 be a maybe a Facebook post?

↑

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1 A. It's not what appears. It's what it
2 is. Posted by your client.

3 Q. A Facebook post that appears to be
4 posted by Lynette Michelle Preston. It says --
5 well, there's a yellow highlight on the part
6 that reads, "Put your freaking money where your
7 mouth is and pay him the \$65,000 so he can walk
8 away and leave me in peace."

9 Did I read that accurately?

10 A. You read the "Otherwise shut your
11 damn pie hole and leave me and my little girl
12 alone," to finish the statement for you.

13 Q. Okay. And who is this -- do you
14 understand who this is directed towards?

15 A. Absolutely. It's directed towards
16 me.

17 Q. So who -- who is "him" in "pay him

18 the \$65,000 so he can walk away"? Who is "him"
19 and "he" in that sentence?

20 A. John Cook.

21 Q. And she's saying to pay him \$65,000
22 for what?

23 A. So that she can be of -- rid of him.
24 She wants my money.

25 What? You didn't know your client

↑

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1 wanted rid of your other client.

2 Q. So she's suggesting that you give
3 Mr. Cook \$65,000 so he -- so he can leave her?

4 A. I'm suggesting exactly what it says.
5 She put and capitalized, "Put your freaking
6 money where your mouth is and pay him" --
7 meaning John Cook -- "\$65,000 so he can walk
8 away and leave me in peace. Otherwise shut
9 your damn pie hole and leave me and my little
10 girl alone."

11 Q. Okay. Now, was this sent to you?

12 A. This was a public post.

13 Q. Okay. Was this sent to you
14 separately, privately in any other form?

15 A. Again, this is a public post.

16 Q. So is it your claim that this is an
17 extortionist threat?

18 ATTORNEY SHOCHET: Objection
19 to form. Same reasons as before.

20 BY ATTORNEY MATZKIN:

21 Q. Do you understand my question?

22 Do you understand my question?

23 A. Ask your question appropriately.

24 Q. Is it your claim that this Exhibit 1

25 contains an extortionist threat, "Give me money



Page 38

1 or else..."?

2 ATTORNEY SHOCHET: Objection

3 to form. Competence. Calls for a legal

4 conclusion.

5 But if you want an answer in his lay

6 opinion, you can answer.

7 THE WITNESS: Again, as a

8 layman, I won't be making those decisions; a

9 judge and a jury will.

10 BY ATTORNEY MATZKIN:

11 Q. Okay. But you understand that we're

12 here to determine what evidence you have of

13 your claims; right?

14 A. Yes.

15 Q. Okay. So I'm asking you, does this

16 constitute evidence of your claim of extortion?

17 ATTORNEY SHOCHET: Same --

18 THE WITNESS: Again, I'm not a

19 professional -- go ahead.

20 ATTORNEY SHOCHET: Same

21 objection.

22 You can answer.

23 THE WITNESS: He's going to

24 keep doing it regardless.

25 BY ATTORNEY MATZKIN:

↑

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1 Q. Let's move to Paragraph 30 of the

2 Complaint.

3 Tell me when you're ready.

4 ATTORNEY SHOCHET: What was

5 that? 70-something?

6 THE WITNESS: 77.

7 ATTORNEY SHOCHET: 77. Which

8 one? Which paragraph?

9 ATTORNEY MATZKIN: 30.

10 ATTORNEY SHOCHET: 30?

11 ATTORNEY MATZKIN: Correct.

12 You ready?

13 ATTORNEY SHOCHET: Yep.

14 BY ATTORNEY MATZKIN:

15 Q. Can you read that out loud to me?

16 A. "On or about May 28, 2023, Preston"

17 -- meaning Lynette Preston -- "posted on her

18 social media that, (1), 'I'm going to stand

19 tall and not let Jeremy Hales hurt me ever

20 again'; (2), she will 'put a cap in the ass of

21 anyone who messes with her.' And, (3), 'I'm

22 done with it. You met your match, Mr. Hales.'"

23 Q. Is it your belief that any of those

24 three statements constitute defamation, i.e.,

25 false statements that harm your reputation?



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1 ATTORNEY SHOCHET: Objection

2 to form, as before.

3 THE WITNESS: Same answer as

4 before. A judge and a jury will be deciding

5 that, not myself.

6 BY ATTORNEY MATZKIN:

7 Q. Is it your testimony that "I'm going
8 to stand tall and not let Jeremy Hales hurt me
9 ever again" is a false statement that harms
10 your reputation?

11 A. Yet again, same answer: A judge and
12 a jury is going to determine that, not myself.

13 Q. Okay. Do you have any information
14 as to how that statement harmed your
15 reputation?

16 A. I have plenty of information.

17 Q. Well, what is that?

18 A. Again, a judge and a jury is going
19 to be determining that.

20 Q. Well, no. You said you had
21 information as to how that statement harmed
22 your reputation. So I want to know what your
23 information is.

24 A. You have it, as well. You have all
25 the evidence.



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1 Q. Sir, I need you to tell me an answer
2 to my question.

3 What is your information that the
4 quote "I'm going to stand tall and not let
5 Jeremy Hales hurt me ever again" harmed your
6 reputation?

7 A. First --

8 ATTORNEY SHOCHET: Hold on.
9 Objection to form.

10 THE WITNESS: Oh, my goodness.

11 ATTORNEY SHOCHET: That's a
12 different question. So same objection as
13 before.

14 BY ATTORNEY MATZKIN:

15 Q. Again, how did that statement harm
16 your reputation?

17 ATTORNEY SHOCHET: Form.

18 BY ATTORNEY MATZKIN:

19 Q. Mr. Hales, I have a question
20 pending. How did that statement harm your
21 reputation?

22 ATTORNEY SHOCHET: You can
23 answer.

24 THE WITNESS: First of all, I
25 never hurt her. So in the aspect of claiming



1 that I hurt her, that harms my reputation.

2 That is a false statement. I've never hurt her
3 once. I never hurt her twice.

4 Now, what we can talk about is all
5 the things that she's actually put in legal
6 writing and in court about John Cook abusing
7 her, John Cook actually abusing the child and
8 him threatening her life -- her mom's life with
9 a firearm.

10 Not to mention three -- three
11 legally documented incidents with John Cook
12 pointing firearms at different individuals. We
13 don't even know about the individuals that he
14 hasn't been documented with the Levy County
15 Sheriff, but there's three documented.

16 Living in fear every day of my life.
17 And individuals destroying my life with
18 defamation stating that I've done something to
19 them that I've never once did.

20 Oh, by the way, you're a part of
21 that, as well. In writing. Literally, in
22 writing, you have written it. You have sent it
23 out, and they're all coming forward with what
24 you've said and you've done.

25 BY ATTORNEY MATZKIN:

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1 Q. Mr. Hales, I'm going to just sort of
2 warn that I'm going to ask that the Court
3 require you to pay for this transcript if it is
4 replete with tirades and asides that take up a
5 lot of the transcript and are not --

6 ATTORNEY SHOCHET: Move to
7 strike that last statement by Mr. Matzkin.

8 ATTORNEY MATZKIN: -- and not
9 responsive to my questions.

10 BY ATTORNEY MATZKIN:

11 Q. So --

12 ATTORNEY SHOCHET: Also move
13 to strike that.

14 BY ATTORNEY MATZKIN:

15 Q. Let's look at No. 2 in Paragraph 30,
16 "She will 'put a cap in the ass of anyone who
17 messes with her.'"

18 Where did that statement -- where
19 did you see that statement or hear that
20 statement?

21 A. She posted it on Facebook with a

22 picture of her and her firearm.

23 Q. And is it your belief that that
24 somehow caused you damage?

25 A. That would be why it's in a

↑

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1 Complaint and filed within the courts. Yes.

2 Q. And how did that cause you damage?

3 A. That will be determined by a judge
4 and a jury.

5 Q. So you're not prepared here to
6 explain how this statement on social media,
7 that Ms. Preston will put a cap in the ass of
8 anyone who messes with her, harmed you
9 personally?

10 ATTORNEY SHOCHET: Form.

11 THE WITNESS: That will be
12 determined by a judge and a jury.

13 BY ATTORNEY MATZKIN:

14 Q. But you can't explain here how that
15 harmed you?

16 A. That will be determined by a judge
17 and a jury.

18 Q. But the judge and the jury -- the

19 jury has to base its decision on evidence, so

20 we're here to learn what evidence you have.

21 ATTORNEY SHOCHET: Is that a

22 question?

23 BY ATTORNEY MATZKIN:

24 Q. So what evidence do you have that

25 that statement harmed your reputation or caused



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1 you damage in any way?

2 A. That will be determined by a judge

3 and a jury.

4 Q. Okay. Are you unwilling to answer

5 the question, or you just don't have any

6 evidence that you can articulate?

7 A. That will be determined by a judge

8 and a jury what damage that done -- has done to

9 my reputation.

10 Q. Do you know --

11 ATTORNEY SHOCHET: It's the

12 same question.

13 I need -- I need a two, three, and a

14 bathroom break, guys.

15 ATTORNEY MATZKIN: Let's just

16 finish with this.

17 ATTORNEY SHOCHET: No question

18 pending, so let's take a two-minute break.

19 Okay?

20 ATTORNEY MATZKIN: Let's

21 finish Paragraph 30, and then we'll do that.

22 ATTORNEY SHOCHET: Oh, are

23 you -- are you refusing on the record to give a

24 bathroom break, Counsel? You're adding another

25 question?

↑

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1 ATTORNEY MATZKIN: Go ahead.

2 Take a break.

3 ATTORNEY SHOCHET: Two to

4 three minutes.

5 ATTORNEY MATZKIN: Sure.

6 (A recess was taken.)

7 BY ATTORNEY MATZKIN:

8 Q. We were -- we were looking at

9 Paragraph 30 of the Complaint, and I was asking

10 Mr. Hales if you allege that the third quoted

11 statement -- "I'm done with it. You've met

12 your match, Mr. Hales" -- harmed your

13 reputation in some way?

14 ATTORNEY SHOCHET: Form.

15 THE WITNESS: Do I still
16 answer?

17 ATTORNEY SHOCHET: You can
18 answer. When I say, "form," you can answer it.

19 THE WITNESS: I think you have
20 a drastic misunderstanding in regards to
21 defamation and extortion. This is part of
22 extortion. "Give me what I want: money. Give
23 me promotion. Give me physical items.
24 Donations. Or I'm going to pop a cap in your
25 ass. I am done with you. You've met your

↑

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1 match."

2 There are multiple facets of this
3 Complaint, and you somehow are taking
4 defamation and extortion and trying to ball
5 them up all into one which is extremely foolish
6 on your part. This is extortion. "Give me
7 what I want. If you don't, this is what I'm
8 going to do to you." And then a throwdown
9 threat, "I'm done with it. You've met your

10 match, Mr. Hales."

11 BY ATTORNEY MATZKIN:

12 Q. Okay. So we're --

13 A. And what flowed out of that --

14 please let me finish -- and what flows out of

15 that is defamation upon defamation upon

16 defamation upon defamation in an attempt to

17 destroy my life, my business, my personal

18 relationships and I'm quoting you now, quoting

19 you, Bruce -- an "Anti What the Hales

20 ecosystem."

21 ATTORNEY SHOCHET: I'm going

22 to ask you about that on the record.

23 ATTORNEY MATZKIN: Counsel,

24 Mr. Hales should address me as "counsel" or

25 Attorney Matzkin" or "Mr. Matzkin," not by my



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1 first name. I'd ask you --

2 THE WITNESS: How about

3 "Deuce"? How about I exercise my first

4 amendment right? I'll address you any way I

5 legally want to address you.

6 ATTORNEY MATZKIN: So,

7 Counsel, I'll ask you to politely ask your
8 client to address me as "Counsel," "Attorney
9 Matzkin," or "Mr. Matzkin," one of those three,
10 but not by my first name or any nicknames.
11 Would you kindly make that request of your
12 client?

13 ATTORNEY SHOCHET: Sir, you're
14 taking a deposition. I'm not under oath.
15 Continue with your deposition.

16 ATTORNEY MATZKIN: So you
17 won't ask him to refrain from calling me --

18 ATTORNEY SHOCHET: Continue
19 with your deposition, Counsel. When I talk to
20 my counsel [sic], you do not get to tell me
21 what I tell my counsel -- what I tell my
22 client.

23 ATTORNEY MATZKIN: Well, I've
24 made a professional --

25 ATTORNEY SHOCHET: Please move



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1 on. I'm not going to -- just you're dragging
2 this out. Is there a question? Please ask
3 your next question.

4 ATTORNEY MATZKIN: As a

5 professional courtesy, I would like you to ask

6 your client to refrain from addressing me by my

7 first name or a nickname.

8 ATTORNEY SHOCHET: I've

9 answered. Do you have a question for my

10 client? Otherwise, it's my turn to ask

11 questions.

12 BY ATTORNEY MATZKIN:

13 Q. Okay. Mr. Hales, where is there any

14 statement, as you just described it -- "Give me

15 what I want, or else this is what I'm going to

16 do" -- in one statement?

17 A. \$65,000 requested. \$65,000. We

18 already looked it. We looked at that piece of

19 evidence.

20 Q. And that says, "Give 65,000, or else

21 I'm going to do what"?

22 A. "Put your freaking money where your

23 mouth is, or shut your pie hole." The intent

24 is there to destroy my reputation, to destroy

25 my businesses, to destroy my personal

↑

1 relationships.

2 Q. Paragraph 31, can you read that out
3 loud, please.

4 ATTORNEY SHOCHET: Hang on.

5 THE WITNESS: "Despite knowing
6 the falsity of their statements, Preston and
7 Cook used their defamatory statements to
8 persuade Hales' customers to stop supporting
9 Hales."

10 BY ATTORNEY MATZKIN:

11 Q. So my question is: How did they
12 persuade your customers to stop supporting you?

13 ATTORNEY SHOCHET: Objection
14 to form.

15 When I say, "form," you can still
16 answer.

17 THE WITNESS: All right.

18 Well, we can go in and already see that the
19 customers, for example, in fake "What the

20 Hales" pages -- that you're pretty active in

21 calling people idiots, calling them morons, and

22 yet you want professional courtesy. That's

23 funny, by the way.

24 So we have all of these individuals
25 stating publicly on other hate channels such as

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1 Two Lee's in a Pod, we've got Miltowns Best,
2 "I'm not watching What the Hales anymore. I'm
3 not supporting them anymore." And you at the
4 forefront of it, the "Anti What the Hales
5 ecosystem" in writing. In writing.
6 How can a lawyer be so foolish to
7 put something like that in writing?

8 ATTORNEY SHOCHET: Let the
9 record reflect Mr. Matzkin just smiled again
10 and is smiling at those comments. And he
11 admits he does. Let the record reflect since
12 there's no video here. The jury will be
13 advised of the record.

14 BY ATTORNEY MATZKIN:

15 Q. Paragraph 32, you -- you allege that
16 "Hales reported all of the above events while
17 in Ohio in September 2023, and Ohio court
18 issued a two-year renewable restraining
19 ordering injunction against Preston and Cook
20 for stalking Hales and his fiancee."

21 Did I read that accurately?

22 A. Yes.

23 Q. And then in Paragraph 33, "To date
24 this has not stopped Preston and Cook from
25 continue their illegal acts against Hales.

↑

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1 Rather than cease, Preston has demanded that
2 Hales provide her with a list of names and
3 contact information of all of his donors."

4 Did I read that correctly?

5 A. Yes.

6 Q. All right. Well, where is this
7 demand or in what form does it take of
8 providing her with a list of your contact
9 information of donors?

10 A. I find it ironic that you're asking
11 when you're complaining to the judge that we
12 have released public information in regards to
13 her deposition, and in the deposition, she's
14 the one that demands a list of all of my
15 donors.

16 Q. In which deposition? In the
17 deposition you're referring to from January in
18 the State Court action that she filed?

19 A. Yes.

20 Q. So this 30 -- Paragraph 33, this
21 statement refers to a statement she made during
22 her deposition in January?

23 A. Yes.

24 Q. Do you recall the exact statement?

25 A. Unless you can bring it up as

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1 evidence, I can't recall the exact statements.
2 Unless you have it prepared. We can view it
3 together.

4 Q. That's okay.

5 A. To my recollection -- to my
6 recollection, it is "I want a list of all of
7 his donors" screaming in the deposition.

8 Q. Do you remember the context? What
9 was that in response to?

10 A. Again, if you have it -- if you have
11 it and you pull it up, we can watch it
12 together, but I don't have it in front of me
13 right now.

14 Q. Okay. Other than what you just
15 quoted her from your memory, do you remember
16 what came right before that?

17 A. No, I do not.

18 Q. And when you say in Paragraph 33,
19 "Continuing their illegal acts against Hales,"
20 are you referring to that demand of you
21 providing customer or donor information?

22 ATTORNEY SHOCHET: Objection
23 to form.

24 You can answer.

25 THE WITNESS: They continue to

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1 break the civil protection orders. Your
2 clients have been found guilty, and they
3 continue to break the civil protection orders.

4 BY ATTORNEY MATZKIN:

5 Q. What customers have you lost as a
6 result of the conduct of my clients?

7 ATTORNEY SHOCHET: Hold on.

8 Now, this is different. So client lists are
9 confidential. So I'm going to --

10 ATTORNEY MATZKIN:

11 Mr. Shochet, I have a question, and I'm --

12 ATTORNEY SHOCHET: I am going
13 to instruct him not to answer because the names

14 of -- are you asking for the names?

15 We lost you. You froze for a

16 second. Are you there?

17 THE REPORTER: Mr. Matzkin,

18 can you hear us?

19 ATTORNEY SHOCHET: Are you

20 asking -- are you asking for individuals'

21 names?

22 ATTORNEY MATZKIN: I asked a

23 question.

24 ATTORNEY SHOCHET: Okay.

25 I'll --



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1 ATTORNEY MATZKIN: He can

2 either answer it or say he doesn't understand

3 the question, and I can rephrase it. You

4 can --

5 ATTORNEY SHOCHET: Well, I'm

6 going to object and instruct him not to answer

7 if you're -- I don't know what you're -- if

8 you're asking for names, you do not give out

9 names or anything confidential from your

10 confidential customer list.

11 ATTORNEY MATZKIN: That's an
12 improper instruction because it's
13 (indecipherable) --

14 ATTORNEY SHOCHET: No, it's
15 not. You can go ahead with the Court. It's
16 confidential. I'm objecting. You're not going
17 to get his names because you're asking for
18 confidential information.

19 BY ATTORNEY MATZKIN:

20 Q. Is it your allegation that you have
21 lost customers due to the conduct of my client?
22 Yes or no?

23 A. Yes.

24 Q. Are you capable, if your counsel
25 were to allow you to do so, to identify the

↑

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1 customers that you claim to have lost?

2 A. Yes.

3 Q. And are you capable of identifying
4 individuals by name?

5 A. Yes.

6 Q. So to be clear, when you're talking
7 about customers you've lost, you're talking

8 about individuals?

9 A. To be clear, "customers" is plural,
10 meaning more than one, made up of individual
11 persons.

12 Q. Again, my question is: Are you able
13 to identify individual persons that were
14 customers that you lost?

15 Yes or no?

16 A. Again, as you've already asked this
17 question, yes.

18 Q. How many?

19 A. I do not know the number currently.

20 Q. Can you give me a range?

21 A. We are hiring a professional to do
22 an analysis on money lost, customers lost, and
23 that will be presented in the Federal Court.

24 Q. When you say, "an analysis on
25 customers lost," for example, are you talking

↑

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1 about a viewer of your YouTube videos?

2 A. That is one aspect. A consumer.

3 Q. So you would claim damages as a
4 result of a viewer of your YouTube videos that

5 shows to no longer view your YouTube videos
6 because of something my clients did?

7 A. Yes.

8 Q. So you're going to attempt to
9 identify all people who were your YouTube video
10 viewers and then weren't anymore and try to
11 correlate that with conduct of my clients?

12 ATTORNEY SHOCHET: Objection
13 to form.

14 You can answer.

15 THE WITNESS: The conduct of
16 your client that calls me a child rapist; the
17 conduct of your client that states that I raped
18 their child; the conduct of your client that
19 states that we're opening a terrorist training
20 ground in the old schoolhouse; the conduct of
21 your client that -- I can go on and on and on.

22 Yes, I've lost consumers due to the
23 actions and the statements of your clients, and
24 yes, we will identify as many as we possibly
25 can.

↑

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1 But then the reality is we can't

2 identify all of them, but an expert will do an
3 analysis and share how much I've lost because
4 of them.

5 ATTORNEY SHOCHET: Just,

6 Counsel, I will tell you this, based on the --

7 ATTORNEY MATZKIN: There's no

8 question pending.

9 ATTORNEY SHOCHET: No, no, I

10 know. It's not a question, Counsel. I'm

11 trying to help you. If you and I --

12 ATTORNEY MATZKIN: Counsel, I

13 don't --

14 ATTORNEY SHOCHET: If you and

15 I can come -- -

16 ATTORNEY MATZKIN: -- the last

17 thing I want is your help. Okay? Now, please

18 be quiet, and let me ask my questions. Okay?

19 ATTORNEY SHOCHET: If you and

20 I -- if you and I can enter into a

21 confidentiality agreement, you can get those

22 names.

23 ATTORNEY MATZKIN: I am

24 absolutely willing to keep any information

25 procured in this deposition to myself.

1 ATTORNEY SHOCHET: In writing,
2 sir.

3 ATTORNEY MATZKIN: That
4 doesn't --

5 ATTORNEY SHOCHET: We'll have
6 to a -- it's not just a deposition. We'll do a
7 blanket confidentiality agreement, so you don't
8 have to keep coming back based on an objection.
9 I'm willing to do it. It's very common. I can
10 send you a draft, if you want to look at it.

11 ATTORNEY MATZKIN: Let me
12 respond to that.

13 There's no need for such a document
14 for -- for Mr. Hales to be able to answer my
15 questions in this deposition. You can rely on
16 my representation.

17 We will -- we will move on.

18 BY ATTORNEY MATZKIN:

19 Q. My question is this: Is it -- is it
20 your intent to have an analysis so you can
21 literally identify by name individuals who used
22 to watch your YouTube videos but no longer do,
23 blame it on my clients, and claim damages from

24 that?

25 A. You're horrible at phrasing

↑

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1 questions. But I will do my best to give you
2 an actual good answer.

3 We can provide names of individuals
4 who are not consumers anymore because of the
5 actions and the statements of your clients.

6 Q. And how many such individuals are
7 you able to identify?

8 A. I do not have a count.

9 Q. Is it under a hundred?

10 A. I do not have a count.

11 Q. And for any given such individual,
12 how is it that it causes you damage if they no
13 longer watch YouTube -- you on YouTube?

14 A. Again, a judge and answer a jury
15 will determine damages, not me. I'm a
16 layperson.

17 Q. All right. In Paragraph 79 -- you
18 ready?

19 ATTORNEY SHOCHET: Not yet. I
20 told you we're getting there. Mouse is a

21 little slow. Okay. Okay.

22 BY ATTORNEY MATZKIN:

23 Q. It says, "Despite knowledge of the
24 customer," singular, "contractual, and business
25 relationship with Hales, Cook intentionally and

↑

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1 without valid justification interferes with
2 such relationship."

3 Is it your intent to have a single
4 customer referred to in this paragraph?

5 A. The aspect that Cook defamed myself
6 and then openly, publicly posts that he is
7 posting things such as dildos for a dollar on
8 Levy County Facebook groups, destroying a
9 customer base, trying to make gross allegations
10 that I'm selling dildos, used dildos for a
11 dollar a piece. That he's posting in the
12 democratic party. That he's posting in the
13 LGQBT [sic] communities. That he's posting.
14 That he's posting. That he's posting. All
15 potential customers.

16 Q. Is there a contract that you lost,
17 that you attribute to Mr. Cook or Ms. Preston's

18 conduct or actions?

19 A. Multiple contracts that are under
20 attack personally right now in the aspect of
21 Cook and Preston both stating that they're
22 trying to get our YouTube channel shut down.

23 Oh, by the way, you're a part of that, as well.

24 Huh. Isn't that interesting. Try to hide the

25 smile this time.

↑

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1 All right. So we've got the whole
2 aspect of a contract with YouTube. We've got
3 the whole aspect of a contract with Facebook.
4 We have the whole aspect of a contract with
5 Instagram, TikTok. I can go on and on. X,
6 Twitter.

7 We can go with the aspect of -- oh,
8 I don't know. Olight. Oh, wait. That's

9 right. You're behind that, as well.

10 So we've got Olight. We've got
11 Whatnot being attacked now. We've got anything
12 we can put our hands on being attacked by your
13 clients and personally by you.

14 Q. The question is: Have you lost a

15 contract that you had because of my client's
16 conduct or actions or statements?

17 ATTORNEY SHOCHET: Objection

18 to form. Asked and answered.

19 You can answer it.

20 THE WITNESS: I've already

21 answered it.

22 BY ATTORNEY MATZKIN:

23 Q. No, you haven't.

24 Did you have a contract that was

25 lost --

↑

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1 ATTORNEY SHOCHET: Strike --

2 strike "No, you haven't."

3 BY ATTORNEY MATZKIN:

4 Q. Did you have a contract that was

5 lost or canceled due to my clients'

6 interference?

7 A. Your clients have attempted to

8 interfere with all of my contracts on a daily

9 basis.

10 Q. Okay. You've listed a number of

11 companies. TikTok. Do you have a contract

12 with TikTok?

13 A. Everybody has a contract when they
14 get into the terms of service. That's a
15 written contract.

16 Q. Have you lost that contract due to
17 my client?

18 A. No, I haven't.

19 Q. And What- -- Whatnot, have you a
20 contract with Whatnot?

21 A. Yes, I have a contract with Whatnot.

22 Q. And have you lost that contract due
23 to my clients?

24 A. Not currently.

25 Q. Has it been affected in some way?

↑

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1 A. Absolutely.

2 Q. In what way?

3 A. False bidders.

4 Q. False bidders?

5 A. Yep.

6 Q. What does --

7 A. Your client and you. Your client
8 and you spurring on other people to do hateful,

9 malicious things such as come into my auctions
10 and then inflate prices and then not pay.
11 Therefore, that item is no longer -- for
12 example, if it's a Gatorade bottle and somebody
13 says, "I'm going to pay a thousand dollars for
14 that Gatorade bottle," now they don't pay. Now
15 that item didn't get to the sold to the person
16 that would have paid ten dollars for it.

17 That affects my contracts and my
18 business.

19 Q. And that's something that you're
20 claiming and alleging my clients do?

21 A. I'm claiming you do it, as well.

22 Q. But you don't have a lawsuit against
23 me. You have a lawsuit against John Cook and
24 Michelle Preston; am I right?

25 A. That's interesting I don't have a



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1 lawsuit against you. Yet.

2 Q. So are you claiming that Michelle
3 Preston or John Cook do what you just described
4 to interfere with your bidding, falsely --

5 A. I'm claiming what the Complaint

6 states that they are trying to interfere and
7 hurt my contracts and relationships.

8 Q. Okay. So you acknowledge that you
9 haven't lost the contract with Whatnot due to
10 my clients?

11 A. I've acknowledged that my contracts
12 are under attack on a daily basis due to your
13 client and you.

14 Q. What about YouTube? Have you lost a
15 contract with YouTube due to my clients?

16 A. My contract with YouTube is still in
17 place.

18 Q. Well, you said TikTok, Whatnot,
19 YouTube. You mentioned three or four others.
20 Would you be able to repeat them, or I can have
21 the reporter look back.

22 A. You can have the court reporter do
23 it.

24 ATTORNEY MATZKIN: Would you
25 mind, Alyssa? Thanks.

↑

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1 (Reporter read back from the
2 record.)

3 BY ATTORNEY MATZKIN:

4 Q. Okay. So, Mr. Hales, you have a
5 contract with Facebook?

6 A. I did.

7 Q. You did. But does that mean you no
8 longer do?

9 A. Yeah. It's gone.

10 Q. What was the contract with Facebook?
11 What does that entail, the contract with
12 Facebook?

13 A. That would be proprietary
14 information, and it's none of your business.

15 Q. But you're saying that you had a
16 contract with Facebook, and you lost it?

17 A. Let me answer that again. That
18 contract, it's called "none ya," as in "none ya
19 business."

20 Q. So you're alleging, though, tortious
21 interference against my clients in that their
22 conduct resulted in your loss of contract.

23 So is Facebook a contract that you
24 lost?

25 A. I already answered that for you.



1 Q. No, I don't think you did. Did
2 you -- well, I'll ask you again. Please
3 clarify for me, did you -- are you alleging you
4 lost the Facebook contract due to my clients?

5 A. Yes, I've lost a Facebook contract,
6 and I continue to lose revenue on a daily basis
7 due to your clients and due to you.

8 Q. Well, what's a Facebook contract?

9 A. You want me to name it again? It
10 was called "none ya." "None ya business."
11 That's proprietary, and you're not going to
12 have information in my personal business.

13 Q. Okay. But you're alleging that you
14 had a contract -- a business contract with
15 Facebook and that you've lost it because of my
16 clients; is that accurate?

17 A. I lose revenue on a daily basis due
18 to your clients, due to you.

19 Q. But was there a contract that
20 Facebook said, "Well, we're going to cancel
21 this now because of something"?

22 A. I lose revenue on a daily basis due
23 to your clients and due to you.

24 Q. Okay. Let's go to Olight. Am I

25 correct that Olight is a product that endorsed

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1 What the Hales YouTube?

2 A. You are incorrect. Olight did not
3 endorse YouTube. YouTube had nothing to do
4 with Olight. Olight had nothing do with the
5 What the Hales. What the Hales endorsed or
6 promoted Olight.

7 Q. I see. Was that pursuant to a
8 contract with Olight?

9 A. No. I was not under any contract
10 with Olight.

11 Q. You were not under a contract with
12 Olight?

13 A. Did I stutter?

14 Q. I'm asking to clarify. Did you
15 have -- did you ever have some sort of a
16 contract between you and Olight?

17 A. Did I not already answer that?

18 Q. I'm asking you to answer it again.
19 Did you have a contract with Olight?

20 A. No, I did not have a contract with
21 Olight.

22 Q. Then what did you describe as you
23 were promoting Olight?

24 A. I'll try to put this in the simplest
25 terms possible: I was promoting Olight.

↑

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1 Q. Were you receiving any remuneration,
2 compensation, consideration?

3 A. Yes. Revenue.

4 Q. From Olight?

5 A. Yes, from Olight.

6 Q. Okay. Can you explain how that
7 worked?

8 A. No. That's confidential.

9 Q. This deposition requires you to
10 provide relevant information, and if it's
11 confidential, you can accept my representation
12 that it will not be shared. And your counsel
13 can take any steps he believes is necessary to
14 protect it.

15 But what I need to understand is
16 what you're alleging what my clients did that
17 caused you damage, and you're alleging that
18 they interfered with your contract with Olight.

19 Am I wrong or right about that
20 statement?

21 A. Can you ask a simple question? And
22 by the way, as you said --

23 Q. You had --

24 A. Wait. Pause. I'm not done.

25 As you stated, I can take your



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1 counsel that you won't -- you really think I'm
2 ever going to trust you? You fool. You
3 incompetent fool. Literally, in writing
4 staging the "Anti What the Hales ecosystem."
5 You fool. In writing. Oh, my goodness. And
6 you think I'm ever going to listen to anything
7 you have to say?

8 When it comes down to it, at the end
9 of the day, I have lost income, revenue due to
10 your clients and due to you.

11 Q. So are you alleging that my clients
12 interfered with a contract that you had with
13 Olight?

14 A. I'm alleging that I lose revenue on
15 a daily basis due to your clients and

16 relationships with potential contracts in the
17 future and relationships that are being
18 strained with current contracts.

19 You can ask the question again.

20 You're going get the same answer. Or you can

21 just move on like you do after I put you in

22 your place every single time.

23 Q. Okay. So yes or no, are you
24 alleging that you lost the contract with Olight
25 due to my clients?

↑

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1 ATTORNEY SHOCHET: Objection
2 to form.

3 THE WITNESS: Are you that

4 foolish? How many times do I have to tell you

5 I didn't have a contract, and you want to keep

6 saying, "Are you alleging that I lost a

7 contract with Olight?" How many times do you

8 have to be told there was no contract?

9 Was I making revenue? Yes. I'm
10 losing revenue, and my relationships are being
11 damaged due to your clients and due to you.

12 BY ATTORNEY MATZKIN:

13 Q. Okay. So you're -- you're alleging
14 that you are losing revenue from Olight due to
15 my clients; correct?

16 A. I'm alleging very clearly in the
17 Complaint that there's interference with my
18 contracts, there's interference with my revenue
19 due to your clients and due to you.

20 Q. Well, right now I'm only asking
21 about Olight. So you've made clear that you
22 don't have a contract with Olight or didn't
23 have a contract with Olight, but my question
24 is: Are you claiming that you're losing
25 revenue from Olight due to my clients?



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1 A. How many times do you want me to
2 say? Yes, I'm losing revenue due to your
3 clients with past, current, and even future
4 contracts.

5 Q. But I'm only talking about --

6 A. Do it again. Ask me one more time.
7 One more time. One more time.

8 Q. Just Olight. I just want to know
9 about Olight.

10 A. What did I tell you already?

11 Q. Well, you keep saying, "other past,
12 future, et cetera." I just want to know very
13 clearly, are you claiming you're losing revenue
14 from Olight? Just Olight. Not anybody else?

15 A. I've lost revenue in all aspects of
16 all of my businesses due to your clients and
17 due to you.

18 Q. So that would include Olight?

19 A. Let me state it again: I've lost
20 revenue in all aspects of my businesses.

21 Q. And Olight would be one of those
22 aspects?

23 A. Let me state it again.

24 THE WITNESS: This is like you
25 with Lynette.



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1 Again, I've lost revenue on all
2 aspects of my businesses.

3 BY ATTORNEY MATZKIN:

4 Q. So I'm going to try one more time.
5 Are you claiming that you have lost
6 revenue from Olight from -- due to my clients?

7 Just Olight.

8 A. Again, I have lost revenue in all of
9 my business endeavors.

10 Q. Okay. How would you earn revenue
11 from Olight?

12 A. None of your business.

13 Q. So you're claiming that you lost
14 revenue from Olight due to my clients; right?

15 A. Do you want me to go over this
16 again?

17 Q. So how does the revenue work with
18 Olight?

19 A. None of your business.

20 Q. Okay. What about -- you mentioned
21 past, present, and future contracts. So we
22 went over some social media contracts,
23 Facebook, TikTok, Whatnot, and now Olight.
24 What other contracts have been
25 harmed interfered with by my clients?

↑

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1 A. I've lost revenue in all of my
2 business ventures due to your clients.

3 Q. Okay. But I'd like to have

4 individual name of the companies or other
5 identifying aspect of the contracts.

6 A. Decreased income.

7 Q. No, no. I mean the other party to
8 the contracts that you're saying were harmed or
9 affected?

10 ATTORNEY SHOCHET: Objection

11 to form. You've asked and answered it, but
12 have at it.

13 BY ATTORNEY MATZKIN:

14 Q. So imagine you have a pile of
15 contracts in paper form in front out of all
16 your business contracts. I'd like you to pull
17 out, figuratively, the ones that you claim were
18 harmed or interfered with by my clients and
19 tell me the name on them.

20 ATTORNEY SHOCHET: Objection
21 to form.

22 You can answer.

23 THE WITNESS: Again, my income
24 has decreased due to your clients, what they
25 have said, what they have done, their actions

↑

1 and yours in regards to destroying, you know,
2 the "Anti What the Hales ecosystem."

3 BY ATTORNEY MATZKIN:

4 Q. Okay. So you're not going to just
5 tell me whether Olight itself discretely -- how
6 you lost revenue from Olight; just Olight.
7 You're not going to answer that question?

8 A. Are you even asking questions? I
9 mean, you're literally all over the place
10 mumbling, and then you put all this stuff
11 together, and there's not even a clear question
12 at the end.

13 Can you ask a very clear question,
14 please.

15 Q. Did Olight take some action with
16 respect to their business arrangement with you
17 following the publication of that video where
18 you and Guapo are almost in an altercation?

19 A. Can you ask a clear question,
20 please.

21 Q. Do you know which video I referred
22 to at the storage facility where each you and
23 Guapo had your cell phones out, and you're --

24 A. Yes, I do.

25 Q. Is it sometime after that that you

↑

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1 lost revenue from Olight?

2 A. Yes, it is.

3 Q. How long after that?

4 A. Almost immediately.

5 Q. And yet you're blaming that on Cook
6 and Preston?

7 A. No. I'm blaming that on you and
8 them as they encouraged everybody to contact
9 Olight and state that I was using a flashlight
10 as a weapon, which, by the way, Olight actually
11 markets as a weapon. That's why it is there.
12 And so individuals such as yourself,
13 individuals such as Two Lee's, individuals such
14 as -- you know, your entire What -- you know,
15 "Anti What the Hales ecosystem," encouraging
16 people to go out there and contact Olight to
17 actually hurt my contracts.

18 You know, all that stuff that's
19 actually publicly already addressed. It's all
20 there. It's all evidence. It's there in video
21 form. Yeah. Absolutely that hurt my revenue.
22 Claiming that -- I ain't done yet.

23 Keep your mouth shut -- claiming that I was

24 using a flashlight that's marketed as a weapon

25 as a weapon which never left my hand. Never



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1 left, and never did anything whatsoever. Yeah.

2 You hurt my contract. Your clients hurt my

3 contract.

4 Wait. That's right. There is no

5 contract. You're the one that once asked 25

6 times about a contract. There was no contract.

7 It hurts revenue. I didn't sign a contract

8 with Olight. The revenue was still there. The

9 revenue is gone. Facebook revenue is gone.

10 Olight revenue is gone. YouTube revenue has

11 been destroyed.

12 And my list can go on and on, but

13 really, it's none of your business.

14 Q. So what did Olight do or say? Did

15 they send you a letter? An E-mail? Did they

16 call you on the phone?

17 A. It's none of your business.

18 ATTORNEY SHOCHET: Object to

19 form. Compound, as well.

20 BY ATTORNEY MATZKIN:

21 Q. So after the video that we were
22 discussing, did Olight contact you?

23 A. Again, none of your business.

24 That's confidential information. That's

25 confidential business information.



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1 Q. Well, I'm just asking if they
2 contacted you.

3 A. And I'm just telling you it's
4 confidential. Did you not hear me the first
5 time? Am I stuttering?

6 ATTORNEY SHOCHET: You can --
7 without giving the details, you can answer that
8 one yes or no. That --

9 ATTORNEY MATZKIN: How is it
10 confidential -- how is it confidential just
11 to --

12 ATTORNEY SHOCHET: Counsel, he
13 can answer.

14 It's a yes or no question.

15 THE WITNESS: Yes, they
16 contacted me.

17 BY ATTORNEY MATZKIN:

18 Q. In what form?

19 A. E-mail.

20 Q. And in that E-mail, did they inform
21 you that they were changing whatever business
22 arrangement had been in place?

23 A. Confidential information.

24 Q. Was this E-mail sent the day after
25 that video played?

↑

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1 A. No.

2 Q. Related to when the video played,
3 how long after did you receive this E-mail?

4 A. I don't recall.

5 Q. Was it within a week?

6 A. I don't recall.

7 Q. Do you know if the action Olight

8 took, which you're refusing to disclose, was

9 taken in reliance on a particular source?

10 A. Again, confidential information in
11 regards to the context of the communication.

12 Q. Well, you testified that you were --
13 strike that.

14 Do you know whether Olight watched
15 the video?

16 ATTORNEY SHOCHET: Objection
17 to form. Calls for speculation.

18 You can answer.

19 THE WITNESS: Olight contacted
20 me.

21 BY ATTORNEY MATZKIN:

22 Q. Did they indicate whether they had
23 watched the video in question?

24 A. Olight contacted me. Any contacts
25 of their communication with me is confidential.



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1 Q. But you can just tell me whether
2 they indicated they had watched the video or
3 not.

4 A. Or I can tell you -- or I can just
5 tell you that it's confidential.

6 Q. Well, what I'm trying to ascertain
7 is whether you're able to say whether whatever
8 decision they made to take action that changed
9 their business with you was made in reliance on
10 actually having seen the video or some other

11 source?

12 A. What I'm trying to say is it's

13 confidential.

14 Q. Okay. Do you know whether -- you

15 don't have to tell me the answer, but do you

16 know whether they saw the video or not?

17 A. Any communication with Olight and

18 myself is confidential.

19 Q. Did it include either way whether

20 they viewed the video? Without telling me

21 whether they did or didn't view the video, can

22 you just --

23 A. Any communication with any of my

24 contracts are confidential.

25 Q. But in this case --



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1 A. Any of my business is confidential.

2 Q. Okay. But to be clear, in this

3 case, although not named in the Complaint,

4 Olight is one of the advantageous relationships

5 you claim my clients interfered with?

6 A. Well, you're very clear with that as

7 you've been on the livestreams when individuals

8 are so happy that they actually interfered with
9 it. I mean, why would you even ask when you
10 already had all the answers? Oh, you've been a
11 part of it. You literally have been a part of
12 it sitting right there, and everybody rejoicing
13 that it's gone, that it's over.

14 Where's the grin? Where's the
15 smile?

16 ATTORNEY MATZKIN: Okay. Why
17 don't we take a 12-minute break until 11:45?

18 ATTORNEY SHOCHET: Okay. Go
19 off the record.

20 (A recess was taken.)

21 BY ATTORNEY MATZKIN:

22 Q. Mr. Hales, I want to direct your
23 attention to Exhibit 72.

24 (Deposition Exhibit No. 72 was
25 marked for identification.)

↑

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1 ATTORNEY SHOCHET: Okay. Now
2 this one is a big -- I've got to shrink it a
3 little bit, maybe.

4 It's nine pages; right?

5 ATTORNEY MATZKIN: Correct.

6 ATTORNEY SHOCHET: Just -- I

7 can only get one -- even a half page on the

8 screen. You've got it so big.

9 Just when you refer to it, just tell

10 me where you want me to be. I have it up.

11 Just --

12 ATTORNEY MATZKIN: Yeah. I'm

13 finding it. On the top of the fifth page,

14 Page 5 of the PDF.

15 ATTORNEY SHOCHET: Where it

16 says, "The second incident"?

17 ATTORNEY MATZKIN: Correct.

18 ATTORNEY SHOCHET: Okay.

19 We're here. We got it.

20 ATTORNEY MATZKIN: Yep. If

21 Mr. Hales can read that one paragraph to

22 himself or out loud, as he chooses.

23 THE WITNESS: Okay. I'm done

24 reading.

25 BY ATTORNEY MATZKIN:

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1 Q. Is there anything in there that you

2 disagree with factually?

3 A. Yes.

4 Q. And what would that be?

5 A. It says, "No evidence of a violation
6 was discovered."

7 Q. Where is that?

8 A. Line 2 and 3 in that paragraph, "No
9 evidence of a violation was discovered." Ohio
10 found them guilty.

11 Q. Got you. What about the rest of the
12 factual information?

13 ATTORNEY SHOCHET: Objection
14 to form.

15 You can answer.

16 BY ATTORNEY MATZKIN:

17 Q. So do you disagree with any of the
18 other factual information in that paragraph?

19 A. I agree with the allegation as
20 "unfounded." Ohio found them guilty.

21 Q. Okay. Nothing else?

22 A. Nothing that sticks out to me
23 currently.

24 Q. When you drove by Mr. Cook on the
25 road, did he see you coming?

1 A. Yes.

2 Q. So was he facing where your truck
3 was coming from the other direction?

4 A. He heard me, saw me -- both Cook and
5 Preston both heard and saw. We even slowed
6 down to give the opportunity for them to get on
7 their own property because John Cook was in the
8 middle of the road, which he could not be on
9 the road within 500 feet of myself or George
10 based on the Ohio civil protection orders.

11 Q. Are you -- so let me understand.
12 Are you saying that before your truck reached
13 the point in the road where Mr. Cook was on the
14 side, you had slowed down, and he knew you were
15 coming?

16 A. Yes.

17 Q. So can you describe that? Because
18 we've seen videos of this, but they begin at a
19 certain point in time.

20 So why don't you tell us what
21 occurred prior to the beginning of the videos
22 that we're familiar with?

23 A. I literally just did. They can hear

24 the truck. They can see the truck. We slowed
25 down to give an opportunity for John to get

↑

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1 onto his own property because if he's on his
2 own property, he only has to be within 10 feet
3 of me and George. But he refused to actually
4 go onto his own property.

5 Q. And how long did this, you know,
6 interaction last?

7 A. I did not time it.

8 Q. Would you say it was 30 seconds or
9 more?

10 A. I did not time it.

11 Q. I understand that. Going by memory,
12 was it 30 seconds or more?

13 A. I understand that. Again, I did not
14 time it.

15 Q. Now, why did you just not proceed at
16 a normal rate of speed past Mr. Cook and
17 continue on your way?

18 A. Because I'm polite, and I gave him
19 an opportunity to actually comply with the
20 civil protection order.

21 Q. And him, according to you, having
22 refused to do so, why did you then not just
23 drive past and continue on your way?

24 A. Let's back up.

25 Not according to me. According to a

↑

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1 court he refused to -- he was found guilty of
2 breaking the civil protection order. Can we
3 agree on that?

4 So unless he breaks --

5 Q. I don't --

6 A. I'm not done yet. Let's use the

7 phrasing appropriately because he was found

8 guilty -- guilty by the courts.

9 So my life doesn't change based on

10 the CPOs. Their lives change based on the

11 CPOs. They're the ones that broke the law.

12 They're the ones that have the consequences of

13 breaking the laws.

14 Even as such my life doesn't change.

15 I've still been polite enough to give them an

16 opportunity to actually adhere to the CPO. Yet

17 they did not have. And I have to film every

18 single time I drive by that property for my own

19 protection.

20 An individual who posted -- and you

21 are well aware of -- he's going to shoot me in

22 the face and feed me to the gators.

23 Q. So prior to -- so initially, you had

24 slowed down. You're telling us here that they

25 knew you were coming and chose not to remove

↑

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1 themselves from the road; correct?

2 A. Lynette was not in the road.

3 Lynette was screaming at the side at John. And

4 John was in the road and refused to remove

5 himself from the road.

6 Q. And at that point, you determined

7 that you would need to proceed with him

8 remaining in the road; correct?

9 A. Yes. That's the direction to where

10 I was going.

11 Q. And am I correct that you could have

12 chosen to proceed at a normal rate of speed

13 without slowing down and filming out the window

14 yelling "10 feet," or --

15 A. No. You are --

16 Q. -- and you chose to --

17 A. -- you are completely incorrect. I

18 film every single time -- I'm not done.

19 I film every single time. Your

20 clients have both threatened to shoot me. Your

21 clients have said the most horrific, horrendous

22 things about me. I film every time I even

23 think there's going to be an opportunity that

24 they're around for accountability.

25 They have continually broke the law.



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1 You know they continually have broke the law.

2 They have put my life in jeopardy. They've put

3 George's life in jeopardy. They put other

4 individuals' lives in jeopardy. They've put

5 fans in jeopardy. They put viewerships in

6 jeopardy. They put individuals in Otter Creek

7 in jeopardy.

8 Every single time I have to film for

9 my protection, for my loved ones' protection,

10 for the people that I care about, protection

11 because they are unhealthy, unhinged, insane

12 individuals who are threatening our lives on a
13 daily basis.

14 Don't you even try and start this
15 stuff that I don't have to film when you would
16 film every single time you drove by somebody
17 who threatened your life, to end your life, to
18 shoot you in the face, to feed you to gators.
19 Don't you even try this stuff with me. You
20 incompetent fool.

21 ATTORNEY MATZKIN:

22 Mr. Shochet, if you can't control your client,
23 I'll have to end the deposition, make a motion,
24 and ask that he be assessed the cost of the
25 deposition up to this point, and who knows --



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1 going forward.

2 Can you exercise --

3 ATTORNEY SHOCHET: As you set
4 the grounds on --

5 ATTORNEY MATZKIN: -- some
6 steps to control --

7 ATTORNEY SHOCHET: --

8 (indecipherable crosstalk) grounds. I move to

9 strike what Mr. Matzkin just said.

10 BY ATTORNEY MATZKIN:

11 Q. So, Mr. Hales, you just said that
12 your life is threatened every day -- strike
13 that.

14 Give me an example of Mr. Cook
15 threatening your life.

16 THE WITNESS: Have we provided
17 him the evidence of Cook pointing the gun at
18 me? Oh, okay.

19 We have already looked at Lynette
20 saying she's going to pop a cap in my ass. Oh,
21 wait. That's right. He also has the
22 screenshot to Shara and others in the group,
23 probably including him because he's the grand
24 master --

25 BY ATTORNEY MATZKIN:

↑

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1 Q. Okay. So --

2 A. -- claiming to not control
3 everybody, but he's the one literally telling
4 them what to do.

5 Hey, put your hand down. I'm not

6 done answering the question.

7 ATTORNEY MATZKIN: But I'm

8 about to --

9 THE WITNESS: Put your hand

10 down. I'm not done answering the question.

11 ATTORNEY MATZKIN: -- end the

12 deposition, Mr. Shochet.

13 THE WITNESS: So you already

14 know that your clients have both -- both

15 threatened to shoot me. My life is in jeopardy

16 every day to the point where I have to sell a

17 piece of property that I love to get away from

18 their insanity; that I love, that I crave to be

19 on to enjoy my life and peace and harmony where

20 I just wanted to hide from people, and yet I

21 was stalked by your clients. I was extorted by

22 your clients. I've been defamed by your

23 clients.

24 My life has been threatened by your

25 clients. Every single day I have to live in



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1 the back of my mind, "Are they going to try to

2 shoot me today? Is today the day."

3 BY ATTORNEY MATZKIN:

4 Q. Where did Ms. Preston threaten to
5 put a cap in your ass?

6 A. Oh, my goodness. You already
7 brought it up as evidence. You forgot already?

8 Q. Well, it doesn't refer to you
9 specifically, though. "Anyone," it says;
10 right?

11 A. Nuh-uh. You asked me who she was
12 addressing, and my answer was "Me."

13 Q. And the threats against your life by
14 Mr. Cook consist of what you've described in
15 the Complaint, driving on your property with a
16 gun; right?

17 A. We've already addressed this, and
18 there will be more complaints in with regard to
19 it as well as more evidence is coming.

20 Q. Okay. And then -- and then there's
21 the more recent one you're referring to; am I
22 correct? A social media post or comment about
23 shooting you in the face and feeding you to the
24 alligators; correct?

25 A. I have referred to that.

↑

1 Q. Now, when did you first become aware
2 of that?

3 A. I don't recall the day.

4 Q. But it was recently? Within the
5 last couple of weeks; am I right?

6 A. I don't recall the day.

7 Q. It was no longer than a month ago;
8 right?

9 A. I don't recall the day.

10 Q. It certainly wasn't -- I'm not
11 asking for the day, Mr. Hales. I'm just trying
12 to find out if this is sort of a recent
13 development, the "shooting in the face, feeding
14 to the alligators" threat?

15 A. Is that a question? Because that
16 sounded like a statement to me.

17 Q. Yes. Well, let me ask you this:
18 Did you only learn about that because of Shara
19 Michelle posting it?

20 A. No, I did not.

21 Q. So you learned about it in another
22 way?

23 A. Yes, I did.

24 Q. And what was that? How was that?

25 A. That's attorney/client privilege.

↑

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1 Q. So did Shara Michelle share it with
2 you prior to her posting it?

3 A. No, she did not.

4 Q. So you were aware of this comment
5 before it appeared on Shara Michelle's Facebook
6 page?

7 A. Yes, I was.

8 Q. And you had not disclosed it before,
9 had you?

10 A. There's a lot I haven't disclosed
11 yet.

12 Q. So the specific comment on Facebook,
13 that Mr. Cook threatened to shoot you in the
14 face and feed you to the alligators, you had
15 not mentioned publicly before; am I right?

16 A. Let's be very clear and very precise
17 because this is a matter of law, which is clear
18 and precise. You keep saying "Facebook post."
19 This not a Facebook post. These are messages
20 sent to --

21 Q. Yes --

22 A. -- individuals. Oh, you were
23 probably one of them at some point. Oh. But
24 at any rate, they were Facebook messages.
25 Yes --

↑

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1 Q. Right.
2 A. -- I was aware of them before Shara
3 actually posted them.
4 Q. And am I correct that that
5 particular message originated in May of 2023?
6 A. I don't recall as I'm not looking at
7 it currently.
8 Q. Would you doubt it if I made that
9 representation so we can ask a question about
10 it?
11 A. I doubt anything you represent.
12 Q. So is there a reason why you had
13 sort of kept that to yourself until it showed
14 up on Shara Michelle's Facebook?
15 A. Again, client/attorney [sic]
16 privilege.
17 Q. So I haven't asked you to talk about
18 a communication with your counsel. I'm trying

19 to find out when you learned about the
20 particular Facebook message by Mr. Cook that
21 says, "shoot you in the face and feed you to
22 the alligators"?

23 A. And I'm trying to share with you
24 that I don't recall the exact date. And we're
25 going to be precise in regards to the



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1 information and the evidence for the law. I
2 don't know the --

3 Q. Well, I don't need you to be
4 precise. I need you to just be as best you can
5 answer sitting here now.

6 A. And the best I can answer is I don't
7 recall the exact date.

8 Q. But I don't want the exact date. Do
9 you recall the exact year?

10 A. I don't recall.

11 Q. So you don't know whether it was in
12 2023 or 2024?

13 A. I don't recall.

14 Q. So if you only learned about it in
15 the last month, you wouldn't be able to be

16 confused about which year you learned it in

17 because we're so late in 2024; right?

18 A. Is that a question?

19 Q. Strike that.

20 So from whom did you first learn

21 about the existence of this message?

22 A. I won't be sharing that.

23 Q. Who was the message sent to by

24 Mr. Cook?

25 A. I won't be sharing that either.



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1 Q. But this is a deposition. It's your

2 lawsuit. This is evidence, and I'm entitled to

3 the information.

4 A. Inappropriate timing to receive the

5 information.

6 Q. This is -- this is exactly the time

7 for me to receive the information.

8 A. Let me share again: I won't be

9 sharing that.

10 Q. Okay. So just to move on from this,

11 I'm going to one more time very clearly ask,

12 when and from whom you learned the message that

13 Mr. Cook had sent, that says "shooting you in
14 the face and feeding you to the alligators"?

15 A. Just so we're very clear, this is
16 attorney/client privileged things that we have
17 discussed, and I will not be discussing that.

18 ATTORNEY SHOCHET: Don't waive
19 attorney/client privilege. And if you have to
20 rely on anything that I've told you or DeRamus
21 told you to answer the question, don't answer
22 the question.

23 But if you can answer the question
24 without relying on it, then you should answer
25 it.

↑

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1 THE WITNESS: Okay.

2 BY ATTORNEY MATZKIN:

3 Q. So is it -- is it the case that you
4 were apprised of this message by your counsel?

5 ATTORNEY SHOCHET: Are you --
6 that -- that one you are not going to answer.

7 THE WITNESS: That was pretty
8 dumb.

9 ATTORNEY SHOCHET: That's --

10 THE WITNESS: That was

11 pretty --

12 ATTORNEY SHOCHET: --

13 objectionable, if it's asked again.

14 THE WITNESS: Wow.

15 ATTORNEY SHOCHET: Do not

16 answer that question.

17 THE WITNESS: Wow.

18 ATTORNEY SHOCHET: That was a

19 direct inquiry into the attorney/client

20 privilege.

21 THE WITNESS: Wow.

22 BY ATTORNEY MATZKIN:

23 Q. The existence -- and I'm not asking

24 you to disclose a communication, advice, or

25 anything else. I am asking you whether

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1 there -- that you learned of the existence of

2 that message from your counsel?

3 ATTORNEY SHOCHET: Do you

4 understand you're asking him to reveal a

5 conversation of what he allegedly learned from

6 his counsel?

7 ATTORNEY MATZKIN: That's the
8 only -- that's the only way --

9 ATTORNEY SHOCHET: Don't
10 answer the question. Don't answer the
11 question. Next.

12 ATTORNEY MATZKIN: Okay. In
13 that case, then --

14 ATTORNEY SHOCHET: I will move
15 for sanctions. If I hear anything else, I will
16 move to terminate this deposition.
17 If you ask one more question
18 invading the attorney/client privilege, we're
19 going to -- we're going to move under Rule 30,
20 as I E-mailed you this morning to give you fair
21 warning before the deposition started. I'll
22 refer to that E-mail here on the record -- that
23 if you ask him again one more time about an
24 attorney/client privileged conversation about
25 what he learned from that conversation, we're



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1 going to move to terminate this deposition and
2 take it right to the magistrate.

3 As a matter of fact, we'll call the

4 magistrate if you ask that again.

5 ATTORNEY MATZKIN: Okay.

6 BY ATTORNEY MATZKIN:

7 Q. When you wrote the Complaint -- when
8 you filed the Complaint, which was in March of
9 2024 -- and you referred to statements by
10 Mr. Cook and Ms. Preston, some of which you
11 quote -- were you at that point in time aware
12 of the existence of this message about shooting
13 you in the face and feeding you to the
14 alligators?

15 A. I don't recall.

16 Q. When you were in court in Ohio for a
17 Motion for Contempt regarding this incident
18 that we've been discussing driving past
19 Mr. Cook on the road, am I correct that you
20 presented a Motion for Contempt in Ohio court
21 based on that incident?

22 A. From my recollection, I presented a
23 Motion of Contempt based on multiple, not
24 just --

25 Q. My question -- my question only

↑

1 pertains to this particular incident.

2 So did you present a Motion for
3 Contempt on the incident that we've been
4 describing on the top of Page 5 of this PDF
5 police report?

6 A. The one that they were found guilty
7 on? Yes.

8 Q. Yes. And in that proceeding, did
9 your video get played?

10 A. To my recollection, I believe so.

11 Q. Did you offer it into evidence?

12 A. Again, I'm not going over all that
13 information, and there is so much and years and
14 thousands of upon thousands of video clips and
15 screenshots.

16 But to my recollection, we did play
17 it because he was found guilty for telling me
18 to suck his cock for initiating communication.
19 So we played it, yes.

20 And I believe it was entered into
21 evidence, and then Lynette wanted her side
22 entered into evidence as well, which we
23 obviously didn't have any problem with because
24 it just further shows the guilt. And they were
25 found guilty.

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1 Q. Okay. So your testimony is that
2 during that proceeding in Ohio -- in which you
3 were represented by counsel; am I right?

4 A. Correct.

5 Q. Can you tell me the name of that
6 counsel?

7 A. Eli.

8 Q. Last name?

9 A. Heller.

10 Q. K or H?

11 A. H. Heller.

12 Q. Eli Heller. Out of where in Ohio,
13 if you know?

14 A. I don't know the address.

15 Q. Do you know the town?

16 A. I believe they're out of Cuyahoga
17 Falls, but I'm not 100 percent for sure. I
18 think they have a lot of offices in a lot of
19 different towns or a lot different cities.

20 Q. Okay. And what's the name of the
21 firm?

22 A. That I can't remember off the top of

23 my head either without looking at all of my
24 legal E-mails. I don't have it. I don't have
25 my cell phone. I don't have access to it.

↑

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1 Q. Okay. And so your testimony is that
2 during the proceeding on this contempt, that
3 the video that you took with your cell phone
4 was played into evidence?

5 A. To my best recollection. Again, I
6 want to be very clear that I do not remember
7 100 percent. There has been so much in all of
8 this.

9 Q. Okay. Let's talk about the signs --
10 what we can refer to as "the defamatory road
11 signs." Okay?

12 Do you know what I'm referring to?

13 A. Yes.

14 ATTORNEY SHOCHET: Are you off
15 this exhibit?

16 ATTORNEY MATZKIN: Yes, off
17 this exhibit.

18 BY ATTORNEY MATZKIN:

19 Q. Okay. So my first question about

20 the signs, Mr. Hales. Other than Zim Padgett,
21 Teresa [sic] Granger, and Stephen Granger, are
22 you aware of any individual or individuals that
23 saw the signs where they were posted?

24 A. I am unaware of how many people or
25 how long the signs were posted, even that.

↑

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1 Q. Okay. Has anybody ever reported to
2 you having seen the signs as they were posted
3 before they were removed other than those three
4 individuals?

5 A. Zim Padgett. I don't know who
6 Teresa is who you're referring to, but Therese
7 and Brett Granger all shared with me that they
8 found signs.

9 Q. So other than those three, though,
10 you're not aware or have been informed that any
11 other person saw them while they were posted?

12 A. I've not been made aware.

13 Q. Has anyone ever said anything, to
14 your knowledge, to suggest that they believe
15 the information posted on those signs about
16 you?

17 A. Yes. It's posted all over the
18 internet right now. Oh, look at that. You've
19 actually sat on livestreams with them talking
20 about it on Two Lee's in a Pod. Oh. You.
21 You, of all people. Look at that.

22 Now, so your clients --

23 ATTORNEY SHOCHET: And let the
24 record reflect he just smiled again.

25 THE WITNESS: All right. Your

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1 clients have posted defamatory signs. Don't
2 you still speak over me.

3 Your sign -- your clients have
4 posted defamatory signs which then have spun
5 out of control from other hate, other hate,
6 other hate. Posted all over Facebook. Posted
7 all over YouTube. Posted everywhere in regards
8 stating that they believe this.

9 So the answer is 100 percent. Yes.

10 BY ATTORNEY MATZKIN:

11 Q. So since the signs themselves came
12 to light, is it your testimony that my clients
13 have subsequently, separately from the signs,

14 accused you of the things that the signs

15 accused you of?

16 A. Can you ask a clear question?

17 Q. Well, the signs accuse you of

18 certain things; right?

19 A. All right. Stop right there.

20 You're making a statement. Ask a clear,

21 concise question.

22 Q. The signs accuse you of certain

23 things; correct?

24 A. The signs call me a child rapist.

25 The sign states that I raped their daughter.

↑

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1 Q. So my question is: Other than the

2 sign, are there any other instances of Mr. Cook

3 or Ms. Preston making same or similar such

4 accusations against you?

5 A. There are so many defamatory things

6 said. Thousands upon thousands of texts.

7 Thousands upon thousands of screenshots.

8 Thousands upon thousands of video screen

9 recorded.

10 I would have to spend weeks going

11 through everything to say, "Well, did they do
12 it again?" There's too much. There's too
13 much. Your clients have done so much
14 horrendous, horrific things that I would have
15 to spend weeks. You'd have to give me this
16 question and let me take weeks and weeks and
17 weeks to pull everything out and go, "Here's
18 what they did. Here's what they did. Here's
19 what they did."

20 Q. Yeah, but that's called written
21 discovery, which we've propounded and has been
22 responded to.

23 But my question, to be very clear,
24 is not the thousands and thousands of things
25 you're referring to, but is there any specific

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1 instance of Mr. Cook or Ms. Preston accusing
2 you of the same or similar things that those
3 signs accused you of other than the signs
4 themselves?

5 ATTORNEY SHOCHET: I've got a
6 FedEx coming here. It's okay. You can answer,
7 and we'll take -- he's going to walk in in a

8 second.

9 THE WITNESS: To my current

10 recollection, I don't know. I would have to go

11 through all of the evidence yet again.

12 ATTORNEY SHOCHET: Okay.

13 Pause.

14 (Indecipherable discussion off

15 camera.)

16 THE WITNESS: Randy, I'm not
17 done with that answer. So if, when we unpause,
18 I can finish that answer.

19 ATTORNEY SHOCHET: Okay. Go
20 ahead. Sure.

21 THE WITNESS: Are we unpaused?

22 ATTORNEY SHOCHET: Yeah.

23 THE WITNESS: There is plenty
24 of evidence out there of your clients stating
25 the exact same allegations, if not even other

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1 allegation along those lines to many, many
2 other individuals who have been on that
3 property with them.

4 BY ATTORNEY MATZKIN:

5 Q. So what -- you'll so have to
6 specify, please. So whom do -- can you clarify
7 what you just -- you just said? Because you
8 said you weren't aware before Mr. Shochet took
9 a break, and now you came back and said that
10 there are many -- I'm not even sure what you
11 said.

12 Can you clarify?

13 A. You asked if I'm aware if they've
14 said anything else about me with the signs. I
15 told you, there's so much information that I
16 would have to take weeks to actually go through
17 it all and go, "Well, here you go. Here you
18 go. Here you go."

19 Then I shared with you that your
20 clients have a pattern in their lives that
21 anyone that's in their lives, they don't get
22 what they want, and all of a sudden, they say
23 the exact same gross, horrific things about
24 those individuals.

25 For example, let's talk about Lloyd



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1 Campbell. All of a sudden, Lloyd is the

2 greatest person in the world, but she doesn't
3 get his camper. Now she states that Lloyd is
4 grooming the child -- grooming the child for
5 these things.

6 Let's see. We had Jessica Mumford
7 on the property with her boyfriend which they
8 were great to have living in a shed illegally
9 in Florida. And yet when they didn't get what
10 they wanted from them they went and publicly
11 posted that they do these horrendous, horrific
12 things.

13 I can go on and on and on. What
14 about Jamster, Jamie Starr Johnson? Now, they
15 didn't get what they wanted from Jamie. They
16 post and say these horrific, horrible things.

17 Your clients have a pattern of
18 trying to destroy people's lives.

19 Q. Finished?

20 ATTORNEY MATZKIN: Okay.

21 Mr. Shochet --

22 THE WITNESS: No, I'm not.

23 You have a pattern of jumping on board for fame
24 and a potential of money and trying to destroy
25 people's lives, as well. And it's sick. It is



1 sick.

2 ATTORNEY MATZKIN: Finished?

3 Mr. Shochet, I'm --

4 ATTORNEY SHOCHET: I'm not on

5 deposition, Counsel. Please next question.

6 ATTORNEY MATZKIN: I'm

7 going -- I'm going to be seeking at least a

8 portion of this transcript to be paid for by

9 Mr. Hales when ready, and I'd --

10 ATTORNEY SHOCHET: Move to

11 strike.

12 ATTORNEY MATZKIN: -- like you

13 to -- I'd like you to ask your client to -- I'd

14 like you to control your client and ask him to

15 answer the questions and not go on tirades.

16 ATTORNEY SHOCHET: Are you at

17 the end of your question?

18 ATTORNEY MATZKIN: So you're

19 not willing to instruct your client to answer

20 questions without going on tirades?

21 ATTORNEY SHOCHET: You're --

22 you're not deposing anyone but my client. Do

23 you have another question? Otherwise, I will

24 start answering -- I'll start the cross.

25 BY ATTORNEY MATZKIN:

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1 Q. So my question is -- let's be more
2 specific, then, referring to, quote, what's
3 stated on the signs.

4 You've already testified the signs
5 accuse you of being a child rapist and of
6 raping their child, their daughter; correct?

7 A. Yes.

8 Q. So are you aware of Mr. Cook or
9 Ms. Preston subsequently to the discovery of
10 those signs making any such statements similar
11 or the same as that you're a child rapist or
12 raped their daughter?

13 A. Are you referring to me, or are you
14 referring things such as Lynette stating about
15 her own grandson Landon assaulting their
16 daughter?

17 So are you asking, like, me,
18 personally? Are you asking -- and by the way,
19 just so -- as you're calling these tirades, I'm
20 speaking as loud as possible because Alyssa

21 asked me to speak as loud as possible.

22 And you have done some very horrific

23 things. Your clients have done some very

24 horrific things and have destroyed portions of

25 my life. And so the volume level is for



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1 Alyssa, not for you.

2 So clarify, are you asking in

3 regards to her stating such as Landon, her own

4 grandson, assaulted this child, or are you

5 stating that they say more after the signs

6 about me raping their daughter?

7 Q. After the signs were discovered, do

8 you have any information that Mr. Cook or

9 Ms. Preston accused you of being a child rapist

10 or raping their daughter?

11 A. As I've stated multiple times

12 already, I would have to spend weeks going

13 through all of the evidence, all of the

14 screenshots, all of the recordings, all of the

15 videos because there's been so much stretched

16 out over so long of a time.

17 Q. Okay. But sitting here right now,

18 you're unable or unwilling to identify a
19 particular instance of a statement accusing you
20 of being a rapist or raping their daughter
21 besides this sign?

22 ATTORNEY SHOCHET: Objection
23 to form. Compound question.

24 BY ATTORNEY MATZKIN:

25 Q. So, again, sitting here right now,

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1 can you identify even one statement by Mr. Cook
2 and Ms. Preston accusing you of being a child
3 rapist or raping their daughter other than on
4 the signs?

5 A. I would have work my way through.

6 It'd take weeks to go through all of the

7 evidence to answer that question appropriately.

8 Q. Is it because you -- you've come
9 across some such statements, and you need to go
10 back and dig to find them, or is it because you
11 just expect to find them, but you don't really
12 know of one sitting here?

13 A. Can you ask a real question?

14 Q. If you're going to go back and dig

15 through the thousands and thousands of
16 whatevers, is it because you've already come
17 across statements that you hope to locate
18 accusing you of being a rapist?

19 A. No. It's because there's so much
20 information I would have to, as I've already
21 stated multiple times, go through everything
22 again, and it would take weeks.

23 Q. But you don't recall having already
24 come across something like that?

25 A. Again, I can't answer that question

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1 without going through everything that I already
2 have, and it would take weeks for me to do
3 that.

4 Q. Well, you know, if, for example,
5 other than on the signs a month later -- or any
6 time later -- Mr. Cook or Ms. Preston had
7 written a post or a comment or a private
8 message that you came into possession of that
9 accused you of being a rapist, you'd remember
10 it; right?

11 A. Well, let's -- for example, I just

12 remember one right now because you brought it
13 up.

14 In the actual Complaint where
15 Lynette says, "I'm not going to let Mr. Hales
16 hurt me and my daughter anymore." I believe it
17 was -- oh, "I'm not going to let" -- "I'm going
18 to stand tall and not let Jeremy Hales hurt
19 me." Ms. Preston posted on her own social
20 media that "John posted the signs, not me," to
21 directly quote Preston.

22 John Cook, in Ohio court under oath,
23 stated, "If Michelle put the signs up, what
24 does that have to do with me?"

25 I can keep going and going, but

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1 there's so much. It would take time for me to
2 remember everything.

3 Q. Okay. So sitting here today, you
4 know, without, obviously, the ability to go
5 back right now through thousands of whatever,
6 do you recall ever seeing or hearing any
7 statement by Mr. Cook or Ms. Preston accusing
8 you of being a rapist or raping their daughter

9 apart from on the signs?

10 A. July 2023, Lynette Preston posted on
11 her social media that 'John posted the signs,
12 not me.'"

13 Now, that would be a direct -- don't
14 interrupt me. I'm not done answering the
15 question.

16 Now, that would be a direct
17 statement towards the aspect of "Jeremy Hales
18 is a child rapist. Jeremy Hales raped my
19 daughter."

20 Do you understand? Can you
21 comprehend that? Lynette is referring to it
22 yet again, and you're asking "Has there been
23 anything else?"

24 In the Complaint itself, it states,
25 "In July 2023, Preston posted on her social

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1 media, 'John posted the signs, not me.'"

2 That is a direct towards the sign
3 posting yet again.

4 Q. Are you aware of any private message
5 sent by Mr. Cook or Ms. Preston to anyone in

6 which they claimed you were a rapist or raped
7 their daughter?

8 A. Again, I would have to go through
9 all the evidence and look at everything.
10 Current recollection, I'm not remembering
11 anything off the top of my head.

12 Q. Appreciate that.

13 Now, is it correct that the -- you
14 know, your understanding is that the signs were
15 discovered by Zim and Therese and Stephen
16 Granger; right?

17 A. I wouldn't use the word
18 "discovered." Anybody who saw them could have
19 easily discovered them.

20 I was made aware of them by Zim
21 Padgett, Therese Granger, and Brett Granger.

22 Q. Okay. And when they saw them, they
23 stopped and removed them; right?

24 A. Not initially. They made me aware
25 of them, and then I asked them to remove them.

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1 Q. When you say they -- "not initially,
2 but they first made you aware of them," can you

3 elaborate? Did they call you from the scene of
4 the discovery -- their discovery of the signs?

5 A. I don't recall if it was phone
6 call -- well, it was text. Brett texted me. I
7 don't recall if Zim texted me or called me.
8 But -- but I do recall the text from Brett.

9 Q. And was that at -- was that at,
10 like, 7:00 a.m., give or take a few minutes?

11 A. That, again, I don't recall.

12 Q. Well, do you recall whether the text
13 was that, "Hey, we found these signs. They're
14 still in the ground," or was it after they had
15 already removed them?

16 A. Here's what I recall: I recall
17 thinking "how horrific, who horrendous for
18 somebody to say something about another
19 person." I recall thinking, "Oh, my goodness.
20 How many people drove past this? How many
21 people saw this?"

22 And laughing in the aspect that you
23 would even put in a court order, "Oh, if" --
24 maybe people -- "it was out there for 40
25 minutes, 50 minutes," whatever you put, what a

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1 joke. It takes one person. One person. One
2 person to see something so horrific, so
3 horrible to destroy somebody's life.

4 Even if no person saw it, it is so
5 horrific to destroy somebody's life. I don't
6 care how long it was out there. It could have
7 been out there all day Saturday, and nobody
8 told me, and nobody saw it. It could have been
9 out there all day Friday, and nobody told me,
10 and nobody let me know. It could have been
11 there all Thursday, all Wednesday. The time
12 means nothing.

13 This is a busy highway. We've got
14 Route No. 24. All tourism going to Cedar Key
15 and back and forth. We've got Route 98, 19,
16 the busiest -- one of the busiest highways in
17 all of Florida with the most accidents, as
18 well; causing more accidents posting signs out
19 there, no doubt.

20 So I don't care how long they were
21 out there. All I care is it was out there, and
22 it was a horrific, horrendous thing to do
23 somebody. Horrible. Horrible.

24 Q. So do you -- do you have any

25 evidence or information that the signs were

Page 118

1 posted before midnight --

2 A. As if it matters.

3 Q. -- the morning they were discovered?

4 A. As if it matters. They were posted.

5 They were put in the ground. People saw them.

6 End of story.

7 Q. Do you have any information that

8 they were posted the day before?

9 A. You already have the answer to the

10 question. You've already asked. Please move

11 on.

12 Q. So is that a "no"? You don't have

13 information they were posted a day before they

14 were found; right?

15 A. I've already shared with you what my

16 knowledge of them is.

17 Q. Okay. So you just testified this

18 was a busy -- sort of a busy location for cars

19 to be driving by where the signs were found;

20 right?

21 A. Yes.

22 Q. Now, and it's busy why? Where are
23 people typically on their way -- you know, is
24 it Cedar Key?

25 A. It's busy because people drive on

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1 it. It's a road.

2 Q. No, I understand. But where might
3 somebody who doesn't really live around there
4 but has to go down that road -- where might
5 they be, you know, typically going to if you
6 had to guess? Cedar Key? A tourist
7 destination?

8 A. So Cedar Key would be a major
9 tourist destination. You've got Route 19,
10 which is also Route 98, which is a major
11 north-to-south route on the -- on the West
12 Coast of Florida on the nature coast. Major,
13 major highway.

14 Q. Okay. Now, so you know that the
15 signs, according to your affiants, which are
16 the Grangers and Zim, were found by them, I
17 believe, around 7:14 a.m. Sunday morning;
18 right?

19 A. I don't recall the time.

20 Q. So if we assume that there's some
21 cars that drove by where the signs were
22 posted --

23 A. Let's not assume because we know
24 what assuming does. It makes you look like a
25 complete and total ass and me, as well. So

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1 let's not assume. Let's get down to actual
2 facts.

3 Q. Okay. But we don't -- we don't have
4 any, like, video showing cars driving by there;
5 right? There's no, like, traffic cam near
6 there; right?

7 A. Do we need video? I mean, this is
8 such a horrible thing to say about somebody and
9 to post. We don't need a video. We know
10 people are on the road. We know people saw it.
11 We don't need a video. We don't need a picture
12 of it.

13 It doesn't even matter if nobody
14 drove by. It's so horrible that your clients
15 did this.

16 Q. Wait. So now you're assuming that
17 cars drove because you just said, you know, "We
18 don't need video. We know." That's an
19 assumption; right?

20 Because you can know, or you can
21 know know. You know what I mean?

22 A. The way that you know that your
23 clients wrote those signs? Yeah, I know what
24 you mean.

25 Q. So for example, I mean, you know,

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1 you know cars drove by. I mean, it makes
2 sense. It's a busy road.

3 But to know know that would be like
4 having a video of the cars driving by; right?

5 A. Well, I'm pretty confident cars
6 drove by when Zim drove by, the Grangers drove
7 by. Zim and the Grangers saw cars driving by.

8 Q. But --

9 A. Pretty confident to know know, both
10 know and know know.

11 Q. Okay. So did Zim and the Grangers
12 tell you that they saw cars driving by that saw

13 the signs while they were there?

14 A. Again, I don't recall.

15 Q. So let's give you the benefit of the
16 doubt that a good number of cars drove by there
17 while those signs were stuck in the ground.

18 Okay?

19 Can we work on that assumption in
20 your favor? Okay?

21 A. Let's state that even if one car
22 drove by, whether it was Zim, whether it was
23 Therese, whether it was Brett, whether it was
24 anybody, is too many cars to --

25 Q. Right.

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1 A. -- read something so horrific.

2 Q. Right. So -- well, you already
3 admitted, I believe, in response to written
4 discovery -- and you can confirm or we can look
5 it up -- that you're not claiming that
6 Mr. Padgett -- Zim Padgett or the Grangers
7 believed the statements on the signs; correct?

8 You're not claiming they believed
9 any of it; right?

10 A. I can't claim what another person
11 believes.

12 Q. Has Zim Padgett or either of the
13 Grangers ever said anything to you to suggest
14 that they have any doubt about the falsity of
15 those signs?

16 A. That communication hasn't happened
17 with me. But when you want to talk about what
18 people believe, I believe 100 percent you know
19 that your clients did this. And yet at the
20 same time, you're going to play this game in
21 court.

22 I believe 100 percent you know they
23 did this. And you're playing a game in PR and
24 all of this and the "Anti What the Hales
25 ecosystem." You believe because you know they



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1 did it.

2 I 100 percent believe that you know
3 that 100 percent they did it. You know 100
4 percent they're guilty. I believe you 100
5 percent know they're guilty.

6 You want to keep talking about what

7 I believe?

8 Q. Okay. So I'm going to give you all
9 of that. I'm going to give you all of that.
10 And I'm just trying to get to the issue of
11 publication. So I'm giving you all of what you
12 just said. Good for you.

13 Now, can we move on, and answer my
14 question, about publication of the signs, of
15 the defamatory information?

16 I'm going to move on and I'm going
17 to ask you the next question and it's about the
18 issue of the publication of the defamatory
19 signs.

20 So -- so how would you be able to
21 determine if any given car that drove by --
22 let's say you had a road -- a checkpoint 200
23 yards past the intersection where the signs
24 were so that somebody can waive down every car
25 and say, "Hey, did you see those signs and what

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1 they said"? Now, how would you be able to
2 determine if any car, any driver, any passenger
3 in a car driving by read those signs?

4 Is there any way for you to
5 determine that or prove that? Yes or no?

6 A. First of all --

7 Q. And if it's yes, you tell me how.

8 A. First of all, you're horrible at
9 asking questions. You really need to work on
10 this if you're going to be a professional
11 lawyer.

12 No. 2, I'm going to use the Socratic
13 method, which I assume you're aware of. So it
14 comes from Socrates. You answer a question
15 with a question.

16 Now, in all reality, you're in
17 charge of this deposition. This is your
18 deposition. But I'm going to ask you the same
19 question: How in the world can you confirm
20 that nobody saw it? Oh, wait. That's right.
21 You can't.

22 Q. I guess --

23 A. You can't. That's the reality. You
24 cannot confirm. I'm answering your question,
25 and I'm using the Socrates method -- the

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1 Socratic method to answer your question.

2 How can you confirm that nobody saw
3 it? How you can confirm that no damage was
4 done to my reputation? How can you confirm who
5 did, how many people?

6 How can you -- how can you -- how
7 can you -- you can't, and you know you can't.

8 THE REPORTER: Can you please
9 slow down.

10 THE WITNESS: You know people
11 drove by. You know people saw it. You have
12 evidence that at bare minimum, three people saw
13 it. And then I was made aware of it.

14 And at the end of the day, the jury
15 is going to make the conclusions, not you and
16 not me.

17 Q. Finished?

18 All right. Do you understand that
19 in your lawsuit that you have the burden to
20 provide evidence to prove your claims,
21 including damages?

22 A. Absolutely. Yes.

23 Q. Okay. And do you understand that in
24 this lawsuit where you claim defamation in the
25 form of these road signs, that one element of

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1 your claim is to prove that they were published
2 causing damage to you?

3 Do you understand that that's an
4 element?

5 A. Yes. I also understand that the
6 magistrate has also said that damages don't
7 even need to be proved because of the
8 statements that were made are so defamatory,
9 they're so destructive to a person and their
10 reputation.

11 Q. Okay. But we're talking about
12 publications, so not --

13 A. Well, I'm answering your question
14 based on what the magistrate has already said,
15 who is ultimately going to be a part of the
16 actual decisions of who is guilty, who is not
17 guilty, and the jury, who is guilty, who is not
18 guilty.

19 So you ask a question, whether you
20 like my answer or not, you're going to get my
21 answer. And the answer is the magistrate has
22 already stated these things are so horrible

23 damages don't even need to be proved in the
24 Complaint. That's how horrific it is.

25 Q. Well, you may be right, but if I

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1 may, I'm going to hypothetically assume that
2 the -- for the sake of my argument -- for the
3 sake of my question that the magistrate hadn't
4 examined the issue of publication, and that's
5 the question that I have.

6 So my question is: Is there any way
7 for you to demonstrate that any single or
8 multiple individuals driving by saw those
9 signs?

10 A. Yes. Three individuals --

11 Q. Other than --

12 A. -- saw the signs up.

13 Q. Other than those three. Other than
14 those three individuals?

15 A. Three is too many. Two is too many.
16 One is too many. It's so horrific.

17 Q. So you have no evidence that you can
18 provide in this case, that any other person
19 drove by and saw those signs?

20 ATTORNEY SHOCHET: Objection

21 to form. That calls for a legal conclusion.

22 We're back on that track again. Competence.

23 ATTORNEY MATZKIN: That was a
24 fact question.

25 Can you read the question, Alyssa?

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1 (Reporter read back from the
2 record.)

3 BY ATTORNEY MATZKIN:

4 Q. Correct?

5 ATTORNEY SHOCHET: Same
6 objection.

7 BY ATTORNEY MATZKIN:

8 Q. You can answer the question.

9 ATTORNEY SHOCHET: Answer the
10 question subject to my objection.

11 THE WITNESS: What's the
12 question, again?

13 BY ATTORNEY MATZKIN:

14 Q. Do you have any evidence you can
15 produce in this case that anybody other than
16 those three individuals drove by and saw the

17 signs?

18 A. Common sense.

19 Q. Okay. Thank you.

20 A. Which I believe the jury will
21 hold -- have and hold onto.

22 ATTORNEY MATZKIN: By the way,
23 we'll go to 1:00, if that's okay, and then take
24 45 minutes.

25 Alyssa, is that above standard?

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1 THE REPORTER: I can have a
2 shorter lunch, too. That's fine.

3 ATTORNEY MATZKIN: Gentlemen,
4 would that work for both of you?

5 ATTORNEY SHOCHET: So, you
6 know, this is a Federal Court deposition. You
7 have a time cutoff.

8 You do know that; right?

9 THE WITNESS: No, he doesn't

10 know.

11 ATTORNEY MATZKIN: Well, I
12 understand. I mean, do you want to have lunch
13 or not?

14 ATTORNEY SHOCHET: You want to
15 have lunch?

16 THE WITNESS: Let's get it
17 done.

18 ATTORNEY SHOCHET: Okay. Oh.
19 You don't want to have lunch?

20 THE WITNESS: We'll have
21 lunch. We'll have lunch.

22 But I do want to add that we will
23 have traffic information coming for the
24 court -- for the Federal Court.

25 So we will -- we will get that from



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1 the State and have traffic information on those
2 roads.

3 ATTORNEY MATZKIN: I
4 appreciate that.

5 BY ATTORNEY MATZKIN:

6 Q. Let me ask you about that.

7 So have you already taken steps to
8 begin procuring such information?

9 ATTORNEY SHOCHET: Hold on.

10 THE WITNESS: Wow.

11 ATTORNEY SHOCHET: Again --

12 THE WITNESS: Wow.

13 ATTORNEY SHOCHET: -- once

14 again --

15 THE WITNESS: Wow.

16 ATTORNEY SHOCHET: -- once

17 again, do not reveal anything that you've

18 learned from me about that.

19 THE WITNESS: Wow.

20 ATTORNEY SHOCHET: But if you

21 can answer without -- that's work product and

22 attorney/client privilege.

23 THE WITNESS: Attorney/client

24 privilege. Move on.

25 ATTORNEY SHOCHET: Well, do



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1 you know anything outside of it -- outside of

2 our conversations?

3 THE WITNESS: Not outside of

4 our conversations.

5 ATTORNEY SHOCHET: Okay. Then

6 don't answer that question.

7 THE WITNESS: Okay.

8 BY ATTORNEY MATZKIN:

9 Q. Are you aware of a source of traffic
10 information that would tell how many cars drove
11 by on whatever that date -- May 14th, 2023 --
12 during the period of time when those signs were
13 posted?

14 ATTORNEY SHOCHET: Same
15 objection. If you can answer that question
16 without relying on things that you and I
17 discussed, you can answer. But otherwise, do
18 not answer that question.

19 BY ATTORNEY MATZKIN:

20 Q. So you expect to have some sort of a
21 factual report that constitutes evidence of
22 people reading those signs?

23 ATTORNEY SHOCHET: That's a
24 direct work product violation question. I'll
25 assert work product privilege as well as



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1 attorney/client privilege.

2 If you can answer the question
3 outside of what you discussed, you can answer
4 it. Otherwise, do not.

5 BY ATTORNEY MATZKIN:

6 Q. Well, Mr. Hales, you testified in
7 response to my question about whether you can
8 produce evidence of anybody seeing the signs
9 that, in fact, you intend to produce some sort
10 of data.

11 And I'm trying to understand what
12 this data is, and you know, is there some sort
13 of a bureau of information that has such
14 information that you're availing yourself of?

15 ATTORNEY SHOCHET: Same
16 objections.

17 ATTORNEY MATZKIN: So you're
18 instructing him not to answer whether he's
19 aware of whether there's a -- some sort of a
20 source of public information about traffic?

21 ATTORNEY SHOCHET: You just
22 rephrased your question three times.

23 ATTORNEY MATZKIN: All right.
24 I'll rephrase it one more time to avoid your
25 problem with it.

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1 ATTORNEY SHOCHET: He's not

2 going to reveal any conversations that I've had
3 with experts and data because I haven't decided
4 yet how, what, where, who we're going to use
5 it.

6 When it is decided, you will be
7 given expert disclosure.

8 Did you want to go lunch? You want
9 to --

10 ATTORNEY MATZKIN: No. 1:00.
11 1:00.

12 ATTORNEY SHOCHET: Oh. We're
13 going to 1:00.

14 BY ATTORNEY MATZKIN:

15 Q. You procured and have disclosed in
16 opposition to a summary judgment motion the
17 expert report of a handwriting expert Dianne
18 Peterson; right?

19 A. Yes.

20 Q. Excuse me.

21 And had you already determined that
22 Mr. Cook and Ms. Preston and/or Ms. Preston
23 wrote those signs before Ms. Peterson was hired
24 and conducted her analysis?

25 A. We suspected. We did not know.



1 Q. And what was the suspicion based on?

2 A. Based on the character of your
3 clients and what they've done to our lives.

4 Q. And was there any effort to
5 actually, you know, factually determine it, not
6 just assume it because of their character?

7 Did you take any steps to factually
8 determine that my clients wrote the signs?

9 A. Yes. I contacted Deputy Weaver of
10 Levy County Sheriff who then told me that there
11 was nothing that they were going to be able to
12 do, whether it be fingerprinting or anything
13 else.

14 And that I had a very strong
15 defamation case, which then I went to multiple
16 stores -- Ace Hardware and Walmart -- and asked
17 to get all video footage and all receipts from
18 individuals buying those particular products
19 that were used for those signs.

20 Q. And were they provided to you? Were
21 those videos and receipts provided to you?

22 A. No, they were not.

23 Q. Why weren't they? Did somebody

24 explain why they weren't being provided?

25 ATTORNEY SHOCHET: Objection

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1 to form. Calls for hearsay.

2 You can answer, if you know outside
3 of that.

4 THE WITNESS: At that time
5 frame, they were not able to provide.

6 BY ATTORNEY MATZKIN:

7 Q. So let me understand. You went to
8 the local hardware store local to Otter Creek?

9 A. Yes.

10 Q. What store?

11 A. Ace Hardware.

12 Q. And how -- if you know, how far is
13 that Ace Hardware? Is it in Otter Creek?

14 A. No. There's nothing in Otter Creek.

15 Q. And where is it in? What town is it
16 located?

17 A. Chiefland.

18 Q. And how far would that be from your
19 property?

20 A. Ten minutes.

21 Q. Ten minutes by car?

22 A. Well, if your client is going to
23 walk it, 18 hours both ways, which she has
24 attempted to, putting a child's life in danger
25 and her own.

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1 You can roll your eyes as much as
2 you want. The reality still exists.

3 Q. Yeah. But I'm trying to stay on
4 point here.

5 Okay. You went to Ace Hardware
6 after -- how long after May 14, 2023, when the
7 signs were found did you go to Ace Hardware?

8 A. I don't recall the exact dates.

9 Q. Do you -- did you do it -- within a
10 week, did you visit a Ace Hardware from that
11 date?

12 A. No matter how you rephrase this
13 question, I don't recall the exact dates.

14 Q. Okay. What do you recall about this
15 trip to Ace Hardware?

16 A. I remember going to Ace Hardware and
17 asking, "Can I get your video footage? Can I

18 get copy of receipts for these particular
19 products that were purchased?"

20 Q. Did you identify -- did you give
21 them the specific date you wanted those
22 receipts from, like, May 14th, May 13th, May
23 12th?

24 A. Yes.

25 Q. And whom did you speak with?

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1 A. That I don't recall.

2 Q. Did you ask for a manager?

3 A. I don't recall if I was talking to a
4 manager or not.

5 Q. And was it just one conversation
6 that you asked, and they said, "Sorry. We
7 can't give it to you"?

8 A. It wasn't, "Sorry. They can't give
9 it to me." They would have given it to me if
10 it was within a time frame that they can
11 actually go back and get it, but unfortunately,
12 that time frame had already lapsed in their
13 system.

14 Q. I see. So you're saying they have a

15 CCTV, you know, loop, and it kind of erases
16 after a period of time?

17 A. You sure are putting a lot of words
18 in their mouths.

19 Q. Well, I mean, I'm familiar with that
20 process. So you're saying that they have
21 footage that would have captured somebody
22 coming in and buying, you know, these products,
23 but that that footage was no longer available
24 by the time you asked them for it?

25 A. That is correct.

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1 Q. But what about the receipts? The
2 receipts wouldn't have been, you know, disposed
3 of, would they?

4 A. I just shared with you exactly what
5 was shared with me.

6 Q. In other words, separately from the
7 video footage, they're saying that they also
8 couldn't provide you the receipts?

9 A. They could not go back in that time
10 frame and provide video footage or receipts.

11 Q. And, I mean, I can understand video,

12 but why would they not be able to provide
13 receipts? I mean, you can go back and provide
14 receipts, you know, from years ago?

15 A. Why don't you call them and ask
16 them?

17 Q. Okay. So you didn't do anything
18 else to follow up on this?

19 A. I went to Walmart and did the exact
20 same thing.

21 Q. And how did that go? Was that the
22 same day?

23 A. No, it was not.

24 Q. Which one was first? Ace or
25 Walmart?

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1 A. Ace Hardware was first.

2 Q. Okay. And then do you remember how
3 long later you went to Walmart?

4 A. No, I do not.

5 Q. Did you go with anybody?

6 A. I don't recall that either.

7 Q. So when you went to Walmart, do you
8 remember who you spoke to there?

9 A. No, I do not.

10 Q. Do you remember whether it was a
11 manager or a cashier?

12 A. Why would you ask a follow-up
13 question if I literally just told you I don't
14 recall who I spoke to?

15 Q. Well, because maybe the "who" was
16 the -- you thinking the person by name. So now
17 I'm trying to get more general in whether you
18 remember, you know, anything about the person
19 you spoke to.

20 Was it a manager?

21 A. I don't remember the person that I
22 spoke to.

23 Q. Was it a man or a woman?

24 A. That I don't recall either.

25 Q. Okay. And what was their response

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1 to your request for video footage and --

2 A. It was another dead end.

3 Q. I'm not done with my question.

4 A. They couldn't provide it.

5 Q. I'm not done with my question.

6 THE REPORTER: Mr. Hales,

7 please wait.

8 BY ATTORNEY MATZKIN:

9 Q. What was their -- what was their
10 response to your request at Walmart for video
11 footage or receipts of the products that, you
12 know, made the signs?

13 A. That they couldn't provide it.

14 Q. And did they explain why they
15 couldn't provide it?

16 A. Foggy in the back of my mind. I
17 think Walmart was of the point that they needed
18 a court order to provide such information,
19 which we did not have at that point in time.

20 But -- and Ace -- Ace Hardware just
21 time elapsed, and it was no longer in their
22 system.

23 Q. Okay. Now, right now there's
24 nothing preventing you from subpoenaing Ace or
25 Walmart whether for video or receipts; right?

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1 A. Correct.

2 Q. And have you taken steps to do that?

3 A. That would be attorney/client
4 privilege.

5 Q. But you're convinced that the
6 products were bought by my clients, or at least
7 somebody on their behalf; correct?

8 A. I'm convinced that your client,
9 Lynette Preston, wrote half the signs stating
10 that I'm a child rapist.

11 Q. And you're convinced that they were
12 purchased either at Ace or Walmart?

13 A. I just shared with you what I'm
14 convinced. Your client, Lynette Preston, wrote
15 half of the signs stating that I'm a child
16 rapist.

17 Q. Other than going to Ace and Walmart,
18 did you do anything to identify the handwriting
19 besides -- and before hiring the expert?

20 A. Yes. Individual research.

21 Q. Go ahead. What did you do?

22 A. I looked at her handwriting that she
23 posts publicly on the property. I looked at
24 other individuals' handwriting that was
25 publicly available through public records from

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1 everybody in the town, including individuals
2 that actually found them.

3 I analyzed everybody's handwriting
4 to see if there was a match.

5 Q. So -- so you embarked on your own
6 investigation to -- to identify the writer of
7 the signs; correct?

8 A. Correct.

9 Q. And you did so already sort of
10 believing it was Mr. Cook and Ms. Preston or
11 with an open mind?

12 A. I did so with an open mind, and to
13 be frank, I don't believe John Cook wrote those
14 signs. I believe Lynette Preston did and
15 somebody else.

16 Q. So what individuals -- strike that.

17 Whose handwrite samples were you
18 able to procure in your investigation?

19 A. Again, it's been a long time. Lots
20 of information and lots of time has passed, and
21 so I don't recall everybody.

22 But the strongest one is right out
23 in front of the property at Turd Purgatory
24 [sic], her own handwriting. Otter Creek

25 Avenue, Amazon, UPS, FedEx, Box. And drive

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1 North Otter Creek 151.

2 Q. All right.

3 A. Glaring right there in everybody's
4 face.

5 Q. Did you maintain any files or
6 records of, for example, the samples belonging
7 to certain individuals that you examined?

8 ATTORNEY SHOCHET: Objection
9 to form.

10 BY ATTORNEY MATZKIN:

11 Q. Do you understand my question?

12 A. Yep.

13 Q. So did you -- did you maintain any
14 files of the --

15 A. Don't know (indecipherable).

16 THE REPORTER: I'm sorry.

17 What?

18 ATTORNEY MATZKIN: Excuse me?

19 THE REPORTER: I couldn't hear
20 you, Mr. Hales.

21 THE WITNESS: I don't --

22 louder?

23 THE REPORTER: Just clearer.

24 THE WITNESS: I'm sorry. I'll

25 go louder.

↑

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1 I don't recall whether I've kept any
2 of those sample files.

3 BY ATTORNEY MATZKIN:

4 Q. So you're going to testify here that
5 you investigated this handwriting, including by
6 procuring samples of other people to compare,
7 but that you don't recall whether you have
8 files of that work?

9 A. That is not what I said. You asked
10 if I had and held onto any of those files, and
11 I stated that I don't recall if I held onto any
12 of those files or samples.

13 Q. So your testimony is you definitely
14 did have files containing handwriting samples
15 of people, yes?

16 A. My testimony is I looked at any
17 available handwriting samples for anybody
18 within the community of Otter Creek. If I

19 could find it -- if it was a public record, I
20 looked to try to match to find out who did it.

21 I also publicly stated if anybody
22 had any cameras, Bing Blink, anything that if
23 they would share that with us. We did not have
24 anybody come forward with any camera.

25 Q. Okay. So now, for example, if you

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1 were comparing someone's handwriting that you
2 located within the community to see or to rule
3 it out, what would you do to make that
4 analysis? Would you just look at it and then
5 say "Nope" and move on, or would you take a
6 photograph of it?

7 ATTORNEY SHOCHET: Objection.
8 Compound question.

9 BY ATTORNEY MATZKIN:

10 Q. Do you understand my question?

11 A. Yep.

12 ATTORNEY SHOCHET: Same
13 objection, for the record.

14 You can answer, but it's subject to
15 my objection with the magistrate.

16 THE WITNESS: I would make a
17 visual comparison and then see if it was
18 actually matching or not. But I'm not a
19 hand- -- please, let me finish.

20 I'm not a handwriting expert. So
21 once we found a comparison that matched, we
22 hired a handwriting expert who can actually get
23 into the forensic science of the handwriting.

24 BY ATTORNEY MATZKIN:

25 Q. So you say you would do a visual

↑

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1 comparison. So you're looking at, you know,
2 some person's handwriting sample, and you're
3 looking at the sign to compare it, right, the
4 signs?

5 A. Well, the same way I can do a visual

6 right now. I can look at you, and I can look

7 at Randy. Randy doesn't have glasses. You

8 have glasses on. I just did a visual. Randy

9 has a small nose. You have a huge nose. I

10 just did a visual. You're both wearing ties.

11 Oh, look, you're both wearing ties and a

12 collared shirt. I can see there's a match

13 there. But he has a jacket. You don't. I'm

14 doing a visual.

15 Q. So if you found a particular
16 individual's handwritten sample and you wanted
17 to then do this visual comparison, would you do
18 anything to preserve the sample other than your
19 memory? So did --

20 ATTORNEY SHOCHET: That's my
21 doorbell.

22 ATTORNEY MATZKIN: -- you take
23 a photograph of the sample?

24 ATTORNEY SHOCHET: Hold on.
25 Did you hear that ring? That's my doorbell.

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1 Hold on.

2 (Attorney Shochet stepped away
3 from the Zoom videoconference.)

4 ATTORNEY MATZKIN: They could
5 be having all kinds of conversation over there.

6 ATTORNEY SHOCHET: Sorry about
7 that, Counsel. I had another delivery. Go
8 ahead.

9 ATTORNEY MATZKIN: Could you

10 read back my last question, Alyssa?

11 (Reporter read back from the
12 record.)

13 THE WITNESS: Is it okay to
14 answer, Alyssa?

15 THE REPORTER: If it's okay
16 with your counsel.

17 ATTORNEY SHOCHET: Sure.
18 Answer.

19 THE WITNESS: Yes.

20 BY ATTORNEY MATZKIN:

21 Q. And would you then download the
22 photo into an electronic file of any sample
23 that you photographed?

24 A. Can you be clear on your questions,
25 please?

↑

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1 Q. You just said "yes" when I asked you
2 if you would take a photograph of samples of
3 people's handwriting that you were comparing to
4 see if they matched the signs; is that
5 accurate?

6 A. So for example, you have it in

7 evidence. You have a picture of her
8 handwriting out front of Turd Purgatory [sic].

9 So, yes, there is a picture. It's
10 uploaded then to the sky into a Dropbox as
11 evidence.

12 Q. Okay. And you're referring to that
13 one particular photograph with the address of
14 her address. I'm aware of that.

15 I'm asking about other individuals'
16 handwriting samples. So did you take any
17 photographs of any other individual's
18 handwriting samples?

19 A. I'm sure I did, but at the same
20 time, the aspect of if it doesn't match why
21 would I hold onto it, then I don't know if I
22 did hold onto it. This has been going on for
23 years now that they've been terrorizing us.

24 So the aspect of if I was to look at
25 one and go, "Oh, does this match? Nope," I'm

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1 going to delete it.

2 The same way that I look at
3 messages. For example, if you were to send me

4 a message, I would look at it, and I would have
5 would laugh and I would delete it, and I would
6 go, "This is irrelevant. This is ridiculous.
7 It's gone. I don't need that in my life."
8 What I need is the matching.

9 So whether I have anything else or
10 any other samples is irrelevant. What I have
11 is samples -- public records of Lynette Preston
12 handwriting. We've got photos of her
13 handwriting on the property. We've got photos
14 of the handwriting of the signs. Anything else
15 is irrelevant if it doesn't match.

16 Q. But at this point in time, you
17 hadn't retained the expert; right?

18 A. I literally have no idea what you're
19 asking right now in regards to a timeline. You
20 are very, very not --

21 Q. At the point --

22 A. -- clear, concise.

23 Q. At the point in time you were
24 conducting your own investigation by locating
25 individuals' handwriting samples to compare to

↑

1 the signs, had you -- you had not yet retained
2 your expert; am I correct?

3 A. Again, a very unclear question. You
4 said -- so if I'm understanding you correct,
5 oh, if a year ago you're looking at -- you're
6 looking at samples and comparing but a year
7 later you're still looking at samples and
8 comparing and you find the sample, obviously, I
9 was comparing samples when Lynette was running
10 to the courthouse in Levy County and writing my
11 over name over and over and over and over and
12 over again in every affidavit, in every special
13 supplemental affidavit writing "Jeremy Hales,"
14 Jeremy Hales." And then when there's a match,
15 I hired the handwriting expert.

16 So I hired the handwriting expert as
17 I was finding the matches and analyzing it.

18 Q. Okay. So I don't want to talk at
19 all about the match. I don't want to talk
20 about Ms. Preston's handwriting sample or the
21 sign that she wrote for her address on her
22 property or of anything she filed in court
23 which contains her handwriting.

24 What I want to ask is about anybody
25 else 's handwriting samples that you analyzed

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1 or compared the signs to.

2 Are there other handwriting samples
3 that you looked at and ruled out as matches?

4 A. I've already answered that question
5 multiple times.

6 Q. And the answer was "yes"; right?

7 A. So you did understand.

8 Q. So with respect to those handwriting
9 samples -- not Ms. Preston's, but anybody
10 else's that you compared to the signs to see if
11 they match or didn't match -- did you take any
12 photographs and preserve them, or did you
13 testify that you deleted any such photographs?

14 A. I testified that I don't know. I
15 don't recall.

16 Q. Okay. Now, before you hired the
17 expert and before you became certain that the
18 handwriting of my client matched the signs, it
19 was possible that there were other individuals
20 responsible for the signs; correct?

21 A. There are two people responsible for
22 the writing on the signs, one of them being

23 Lynette Preston, the other one not being
24 identified as of yet.

25 No, it is not possible for other

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1 people to be responsible because the only
2 people responsible for the consequences of
3 what's written on the signs are the people who
4 actually wrote the signs. That would be common
5 sense.

6 Q. All right. We're almost ready to
7 take a break. But I'm just trying to
8 understand if you -- how many different
9 individuals' handwriting did you procure or
10 locate so you can compare it to the signs?

11 A. I don't remember.

12 Q. Did you find individuals'
13 handwriting samples in a particular form like
14 land records, for example?

15 A. I don't recall where I found it all.

16 Q. Did you -- did you ask anybody,
17 "Hey, may I see a sample of your handwriting"?

18 A. No.

19 Q. No, but you didn't say, "May I just

20 voluntarily have your handwriting so I can rule
21 you out"?

22 A. No.

23 Q. Are you aware of anybody who even
24 knows of the signs that existed other than Zim
25 Padgett, the Grangers, Deanna West, yourself,

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1 Martha George Rizk that -- strike that.

2 Other than those people, does
3 anybody, to your knowledge, know of the signs
4 by any other way other than you having
5 broadcast them on YouTube?

6 A. Yeah. You've been a part of
7 livestreams of them being broadcasted on
8 YouTube on Two Lee's in a Pod. You literally
9 have been a part of it broadcasting the
10 production of the signs, showing the signs, and
11 then making a mockery out of it with a fake
12 handwriting expert making fake analysis
13 accusing me of actually writing them. What a
14 joke.

15 Q. Okay. Now, but it's not your
16 testimony that the Two Lee's were showing the

17 signs so that they can propagate that the
18 statements in them were true about you; right?

19 That's not what you're testifying;
20 right?

21 A. You trying to put words in my mouth

22 now? Can you ask a clear question? How are

23 you a lawyer and not able to ask a clear

24 question?

25 Q. Are you testifying that Two Lee's

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1 was showing the signs so that they were saying
2 to their audience, "These are true. These
3 statements are true"?

4 ATTORNEY SHOCHET: Objection
5 to form. Calls for speculation.

6 And you can answer subject to my
7 objection with the magistrate.

8 BY ATTORNEY SHOCHET:

9 Q. So you don't --

10 A. As to what Two Lee's -- Two Lee's

11 and this moron were out to defame me and run

12 their "Anti What the Hales ecosystem"

13 defamation campaign.

14 Q. Is it your testimony that the Two
15 Lee's told their audiences that you're a child
16 rapist or raped their daughter -- Michelle
17 Preston's daughter?

18 A. My testimony that they have
19 continued to defame me, as well as you.

20 Q. And is it your testimony that --
21 well, are you aware of anybody who became aware
22 of those signs and the statements on them other
23 than Zim, the Grangers, Deanna West, yourself,
24 and Martha George Rizk?

25 ATTORNEY SHOCHET: Objection.

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1 Asked and answered.

2 ATTORNEY MATZKIN: I haven't
3 finished the question.

4 ATTORNEY SHOCHET: Okay.

5 BY ATTORNEY MATZKIN:

6 Q. Are you aware of anyone who became
7 aware of those signs from any other source than
8 your YouTube videos?

9 A. Yes. I've already shared.

10 Q. Who?

11 A. Other YouTube videos.

12 Q. Two Lee's?

13 A. There's one.

14 Q. Any others?

15 A. Miltowns Best.

16 Q. Any others?

17 A. I'm sure there are others out there.

18 There are plenty right now with your "Anti What
19 the Hales ecosystem."

20 Q. And what about Megan Fox? Did she
21 ever show the signs on her YouTube channel?

22 A. I do not know.

23 Q. What about ThatUmbrellaGuy? Did he
24 ever show it on his YouTube channel?

25 A. I do not know.

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1 Q. Okay. So who -- of all the channels
2 on which those signs were shown, to your
3 knowledge, which one was first? Which was the
4 earliest?

5 A. Again, I do not know.

6 Q. Well, we made a list of three
7 channels that you claim to know for sure showed

8 those signs, yours, Two Lee's, and Miltowns

9 Best; right?

10 A. I think you made a much larger list
11 than that and asked me questions on it.

12 Q. But you confirmed that -- those
13 three, yourself, Miltowns, and Two Lee's?

14 A. What's your question, again?

15 Q. Are you confirming that those are
16 the three channels that you know showed those
17 signs -- those road signs?

18 A. No, I'm not confirming that.

19 Q. You're -- a minute ago you were
20 saying Two Lee's --

21 A. I openly -- I openly shared that
22 there are many other channels out there that
23 have shown it as well that I don't even know
24 how far it's gone.

25 But it all stems to the core in

↑

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1 Otter creek With your client, Lynette Preston,
2 and whoever else wrote the other half of the
3 signs. And then other channel --

4 Q. Why --

5 A. -- and then other channels latching
6 on under direction and control of individuals
7 such as yourself creating an "Anti What the
8 Hales ecosystem" with a negative PR against --
9 damaging me, my business, my life, my
10 relationships.

11 Q. Okay. So my question is --

12 A. So no. No, I don't know how many.
13 As a matter of fact, it's spun out of control.
14 And what people believe, I can't answer that
15 question either because I can't tell you what
16 you believe, even though I know you believe
17 that she wrote them.

18 Q. So are you aware of any YouTube
19 channel that broadcasted any information,
20 including images of the signs before you did on
21 your channel?

22 A. I am unaware.

23 Q. Are you aware of any YouTube channel
24 that, in connection with showing the signs or
25 discussing the signs, indicated that they

1 believe the accusations contained on them?

2 A. I'm unaware, but I am aware that
3 you've been on with Two Lee's in a Pod
4 indicating that I actually wrote those things
5 about myself trying to tell people that I wrote
6 them about myself.
7 So I don't know what's more hideous,
8 the aspect that somebody else wrote them or
9 somebody coming in and saying, "Well, Jeremy
10 wrote this about himself" and then post it.
11 Both of them are gross. Both of
12 them are sick. And the consequences for those
13 individuals, including yourself, will be fought
14 out in the court of law.

15 ATTORNEY SHOCHET: Counsel,
16 are you aware that you stated on the record
17 that we'd be breaking for lunch at 1:00 --

18 ATTORNEY MATZKIN: Yeah. I
19 notice. And we're going to break.

20 ATTORNEY SHOCHET: -- and now
21 it's 1:05. Are you aware of that?

22 ATTORNEY MATZKIN: Yeah. So
23 we'll take a break now, and why don't we resume
24 at 1:50?

25 Would that be okay with everybody?



1 ATTORNEY SHOCHET: 1:50. Yep.

2 5-0; right?

3 ATTORNEY MATZKIN: That's 45

4 minutes.

5 ATTORNEY SHOCHET: Bye.

6 (A recess was taken.)

7 BY ATTORNEY MATZKIN:

8 Q. Mr. Hales, you're a Cleveland sports
9 fan; am I correct?

10 A. Not really.

11 Q. You're not a Cleveland baseball fan?

12 A. I'm not a die-hard fan of anything.

13 Q. Okay. Is there a reason why you
14 wear the old Cleveland Indians hoodie on your
15 YouTube streams and not a current Cleveland
16 Guardians hoodie?

17 A. No, there's no reason.

18 Q. Do you have a position on, like, the
19 sports team changing their names out of
20 political correctness?

21 A. No. There's no position.

22 Q. Do you feel like maybe some people
23 might find it offensive to see people wearing

24 old Cleveland Indians jerseys which were, you
25 know, eliminated due to political correctness?

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1 ATTORNEY SHOCHET: At this
2 point, this is way afield. I'm going to object
3 as to relevance. I'll let you do maybe one
4 more question.

5 Subject to my objection, you can
6 answer. If he tries to bring this up, you can
7 answer.

8 THE WITNESS: What was the
9 question?

10 BY ATTORNEY MATZKIN:

11 Q. Well, how would you feel if somebody
12 said they found it offensive, that they're a
13 fan of yours, but they don't like the Cleveland
14 Indians garb?

15 A. I wouldn't care. I would
16 probably -- probably the same way they would
17 feel if I told them I was offended by them not
18 liking what I wear. It doesn't matter in the
19 long run, in the big scheme of life. It does
20 not matter.

21 Q. What's your current relationship --
22 your personal relationship with Martha George
23 Rizk? Are you engaged?

24 ATTORNEY SHOCHET: Objection.

25 Not relevant at all to these proceedings. And



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1 that one is -- you can answer that one, but I'm
2 going to tell you right now -- this was the
3 purpose of the E-mail, Counsel -- their
4 personal relationship has nothing to do with
5 this lawsuit, so --

6 ATTORNEY MATZKIN: That's not
7 for you to determine, Mr. Shochet.

8 ATTORNEY SHOCHET: Let's call
9 the judge. We'll call the magistrate in about
10 five minutes if you're going to have a line of
11 questioning about their relationship.

12 ATTORNEY MATZKIN: That would
13 be interesting.

14 BY ATTORNEY MATZKIN:

15 Q. So are you engaged, you and Martha
16 George Rizk?

17 A. My relationship with Martha George

18 Rizk is of no concern of this lawsuit.

19 Q. Do you have a business relationship
20 with Martha George Rizk?

21 A. Martha George Rizk is an independent
22 contractor.

23 Q. So she's self-employed?

24 A. Correct.

25 Q. And does she have a contract with

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1 What the Hales or with you?

2 A. Yes.

3 Q. And what is the status -- what is

4 her status in that contract? Is it as a

5 service provider?

6 A. Frankly, it's none of your business.

7 That's proprietary information for the

8 business.

9 Q. Is she a service provider paid on a
10 1099?

11 ATTORNEY SHOCHET: Objection.

12 Compound question.

13 BY ATTORNEY MATZKIN:

14 Q. Is Ms. Rizk paid on a 1099?

15 A. It's none of your business.

16 Q. Is there a set -- a set amount of
17 payment to her pursuant to a contract over
18 periods of -- you know, a pay period?

19 A. Yeah. None of your business. This
20 isn't relevant to the actual lawsuit.

21 Q. Okay. Well, that's not for you to
22 determine, so I'm going to ask you again.

23 Is there a contract with Ms. Rizk
24 that involves a regular amount of payment to
25 her over regular periods of time like pay



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1 periods?

2 A. Again, I am determining it. It's
3 not relevant to the lawsuit.

4 Q. I will -- I will say this to your
5 Counsel --

6 ATTORNEY MATZKIN: I do intend
7 to file a motion based on --

8 ATTORNEY SHOCHET: Counsel,
9 you don't need to announce your intentions.

10 I've told you several times, do whatever you
11 have to do.

12 ATTORNEY MATZKIN: Well, this
13 is me endeavoring to -- to make the remainder
14 of the deposition productive. And so if --

15 ATTORNEY SHOCHET: You want to
16 go off the record and discuss this?

17 ATTORNEY MATZKIN: No, no.
18 This is particularly for the record, and that
19 is this: You have not controlled your client.

20 Your client has gone on many tirades, and
21 you're --

22 (Indecipherable crosstalk.)

23 Hey, Mr. Shochet, may I speak?

24 May I speak?

25 ATTORNEY SHOCHET: No, I'm



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1 getting the magistrate on the phone right now
2 on the record. Hang on.

3 ATTORNEY MATZKIN: Now,

4 Mr. Shochet, may I speak?

5 You're -- you're not going call the
6 magistrate now, are you, before I've even --

7 ATTORNEY SHOCHET: Absolutely.

8 Absolutely are.

9 ATTORNEY MATZKIN: -- before
10 -- okay.
11 ATTORNEY SHOCHET: Excuse me?
12 ATTORNEY MATZKIN: Before I've
13 even spoken and finished what I have to say?
14 ATTORNEY SHOCHET: Your -- do
15 you have a question for -- do you have a -- do
16 you have a motion to make on the record or a
17 question for my client other than a speech to
18 me?
19 ATTORNEY MATZKIN: My question
20 is --
21 Can you read the last question,
22 Alyssa?
23 THE REPORTER: One moment.
24 ATTORNEY SHOCHET: While she's
25 looking, do you have any exhibits? Wait. I'm

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1 sorry. This is important.
2 Do you have any -- a different --
3 are you going to be using these same exhibits
4 on Wednesday for Ms. Martha Rizk's deposition,
5 or do you have another set?

6 ATTORNEY MATZKIN: I'm not
7 going to start talking about that. I just need
8 the last question read back, please.

9 (Reporter read back from the
10 record.)

11 BY ATTORNEY MATZKIN:

12 Q. Do you understand the question?

13 A. Yes, I do.

14 Q. Can I have your answer, please.

15 A. You already got my answer. That's
16 confidential business information that you're
17 not entitled to and has no relevancy to this
18 lawsuit whatsoever.

19 Q. Relevancy is not a proper objection
20 in a deposition.

21 ATTORNEY SHOCHET: Motion to
22 strike what Mr. Matzkin just said.

23 Do you have another question?

24 ATTORNEY MATZKIN: I'm asking
25 you to instruct your client to answer the



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1 question, unless you're instructing him not to
2 answer on the grounds of privilege.

3 ATTORNEY SHOCHET: I didn't
4 hear a question.

5 ATTORNEY MATZKIN: I'm asking
6 you, Attorney Shochet, to instruct your client
7 to answer the last question unless you're
8 instructing him not to answer on the ground of
9 privilege.

10 ATTORNEY SHOCHET: Did you
11 hear me instruct him not to answer?

12 ATTORNEY MATZKIN: So,
13 therefore, I'm asking you to ask him to answer
14 the question.

15 ATTORNEY SHOCHET: I'm not
16 here to do that, Counsel. He's answered the
17 question.

18 ATTORNEY MATZKIN: So you're
19 not here to tell -- you're not here to tell
20 your client to answer a question that's been
21 asked in a deposition? You're his counsel in a
22 deposition, but you're not going to tell him to
23 answer a question that you're not instructing
24 him not to answer?

25 ATTORNEY SHOCHET: If you're



1 not happy with his answer, you can do things

2 with it. Please move on.

3 ATTORNEY MATZKIN: I will.

4 BY ATTORNEY MATZKIN:

5 Q. How come the -- the E-mail from
6 Ms. Preston to Mayor Dan in Ohio was not
7 alleged in your Complaint?

8 ATTORNEY SHOCHET: Objection.
9 That's attorney/client privilege and work
10 product. And that I will instruct him not to
11 answer unless you can answer that question
12 outside of conversations that you and I had.

13 THE WITNESS: I can't.

14 ATTORNEY SHOCHET: You can't?
15 Well, then don't answer the question.

16 BY ATTORNEY MATZKIN:

17 Q. Am I correct that there was an
18 E-mail sent by Ms. Preston to a person that we
19 refer to as Mayor Dan, who is the mayor of your
20 hometown in Ohio; correct?

21 A. Yes.

22 Q. And to the best of your
23 recollection, what did that E-mail say?

24 A. To summarize, to the best of my

25 recollection, basically, she was trying to warn

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1 Mayor Dan to try and remove me from the town
2 that I live in.

3 Q. When you say, "remove you," what
4 does that mean?

5 A. She doesn't want me living anywhere.
6 She wants to cause problems wherever I'm at,
7 including whether I'm in Ohio or Florida or
8 anywhere else.

9 Q. Okay. But when you say that she
10 wrote an E-mail to try to have you removed from
11 the town in Ohio, is that what you testified?

12 A. I'm testifying first she contacted
13 the Town Hall multiple times on the phone and
14 then threatened to call the local news station
15 if she didn't get in contact with the actual
16 mayor.

17 Then she sent an E-mail to the mayor
18 and, in an essence, summarizing that she
19 doesn't -- she wants the mayor to know what a
20 problem I am.

21 Q. And -- but you said to have you

22 removed. So was there something in this E-mail
23 that suggested that you should be kicked out of
24 the town?

25 A. Would you like to bring the E-mail

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1 up so we can actually read it?

2 Q. I don't have it.

3 A. Why not? You're asking questions
4 about it.

5 Q. So what town is it, by the way, in
6 Ohio?

7 A. It really doesn't have any relevancy
8 to the issue here.

9 Q. The town that Mayor Dan is the mayor
10 of?

11 A. Well, in all reality, it's not a
12 town. So your question is wrong.

13 Q. Well, what is he the mayor of, even
14 if it's not a town?

15 A. He's the mayor of a village.

16 Q. And what's the name of the village?

17 A. I don't really think it matters.

18 ATTORNEY SHOCHET: It's public

19 record. It's public record.

20 THE WITNESS: Peninsula.

21 BY ATTORNEY MATZKIN:

22 Q. Peninsula, Ohio, is that the address
23 somebody would write on an envelope?

24 A. Yes.

25 Q. And what's the Zip code?

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1 A. 44264.

2 Q. I do -- I do want to have you open
3 Exhibit 73, please.

4 (Deposition Exhibit No. 73 was
5 marked for identification.)

6 BY ATTORNEY MATZKIN:

7 Q. Yes. 73, which is a JPEG.

8 ATTORNEY SHOCHET: A what?

9 Hang on.

10 ATTORNEY MATZKIN: It's not a
11 PDF, but you know, it's a screenshot.

12 ATTORNEY SHOCHET: Okay.

13 Sorry. It's a one-page police report. Okay.

14 We have it.

15 BY ATTORNEY MATZKIN:

16 Q. And is that a police report dated --

17 ATTORNEY SHOCHET: It's really
18 touchy.

19 BY ATTORNEY MATZKIN:

20 Q. It doesn't seem to have the exact
21 date on it, does it? Or am I missing that, the
22 date of the report?

23 Well, in any event, does the report
24 say that you -- that the writer spoke on
25 1/17/2024 to someone who is blacked out, "who

↑

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1 advised that he believes Lynette Preston
2 violated their no contact order"?

3 So we're looking at the same thing?

4 A. That is the first line, yes.

5 Q. All right. And would you agree with
6 me there's no doubt that the name that's been
7 redacted is yours?

8 A. I honestly do not know. It's
9 redacted.

10 Q. I understand that.

11 A. And I have not -- I have not read
12 the rest of the police report. I've only

13 looked at the first line.

14 Q. Okay. I'll tell you what: You take
15 a minute or two or three, even, and please read
16 it. And then my question will be whether
17 you're willing to acknowledge that the -- it's
18 yours.

19 THE WITNESS: Can you increase
20 that?

21 ATTORNEY SHOCHET: Yeah. It's
22 very touchy.

23 THE WITNESS: Yeah, it's very
24 touchy.

25 ATTORNEY SHOCHET: I just

↑

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1 touch it, and it just moves. Is that better?

2 THE WITNESS: Yeah, that's a
3 little better.

4 Yes, that redacted would be Jeremy
5 Hales.

6 BY ATTORNEY MATZKIN:

7 Q. I appreciate that.

8 And can you read the last line and
9 use your name in place of the blacked out part

10 out loud, please.

11 A. Is that the last line?

12 ATTORNEY SHOCHET: The "no
13 contact order," that's the last line?

14 ATTORNEY MATZKIN: The very
15 bottom of the E-mail.

16 ATTORNEY SHOCHET: Where it
17 says, "The no contact order?" "The no contact
18 order"?

19 ATTORNEY MATZKIN: Two
20 paragraphs below that would be the last --

21 ATTORNEY SHOCHET: Okay. It's
22 just we got to get this thing -- this document
23 is -- okay. There. We can pull it up. Now
24 you can see that.

25 THE WITNESS: "It should be

↑

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1 noted" -- "It should be noted that during my
2 encounter with Jeremy I asked him if Lynette's
3 phone number was blocked from his phone.
4 Jeremy replied he had the number blocked before
5 but unblocked it in order to try and get her to
6 break the injunction."

7 BY ATTORNEY MATZKIN:

8 Q. Do you agree or dispute that
9 statement?

10 A. Absolutely disagree. I can't force
11 anybody to break an injunction. I can't force
12 your client, Lynette, to break an injunction.
13 But what I can do is hold her accountable when
14 she does.

15 So for example, I blocked her
16 because of all of her crazy rants. And then I
17 unblocked her because she was told by a
18 court -- found guilty for stalking that she was
19 not allowed to be contacting me. And the only
20 way I would know if she was contacting me is if
21 she was unblocked.

22 And, no, you can't force another
23 person to actually break a civil protection
24 order. Only Lynette can break that civil
25 protection order.

↑

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1 Q. Okay. So my question, then, is:
2 Did you make this statement --

3 A. No.

4 Q. -- that the report says you make?

5 A. No. The officer -- the officer
6 said, "Do you have her number blocked?" I
7 said, "Obviously not. Here's the text message.
8 I did have her blocked. I have her unblocked
9 to know if she breaks the civil protection
10 order."

11 Q. How would unblocking it enable you
12 to know if she breaks the civil protection
13 order apart from --

14 A. Are you literally that dumb? If
15 she's blocked and she contacts me via phone I
16 won't know. If she's unblocked and she
17 contacts me, I will know, therefore breaking
18 the civil protection order which you literally
19 are having me look at a police report where she
20 broke the civil protection order because she's
21 unblocked. That's how I know.

22 Q. I understand. Okay. So I just want
23 to see -- see if I understand.

24 So you had her blocked, and that
25 prevented her from -- even if she were trying

↑

1 to reach you, you wouldn't know because it was
2 blocked; right?

3 A. Correct.

4 Q. All right. And so I guess,
5 theoretically, a third-party witness might be
6 there seeing her attempting to call you, maybe
7 not realizing she's been blocked, and they can
8 report that and say, "Hey I saw her try to call
9 Jeremy. He doesn't know because it was
10 blocked"; right?

11 A. I don't live in a world of
12 theoreticalities. I live in a world of facts.
13 She texted me.

14 Q. All right. So while blocked,
15 although possible for her to attempt to contact
16 you, maybe she knew she was blocked; maybe she
17 didn't. But certainly, she can attempt to call
18 you while blocked; correct?

19 A. Yes, she could.

20 Q. And in that case, you would never
21 know, at least not just from the call itself,
22 correct?

23 A. Correct.

24 Q. All right. So you then at some
25 point in time chose to unblock her number;

↑

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1 correct?

2 A. It's a statement. You got any
3 questions?

4 Q. Correct?

5 A. Oh, my goodness.

6 ATTORNEY SHOCHET: Objection
7 to form. Ask a question.

8 THE WITNESS: Ask a question.

9 BY ATTORNEY MATZKIN:

10 Q. At some point in time, you chose to
11 unblock her number; correct?

12 A. I already answered that question.

13 Q. That was "yes"; right?

14 A. I already answered that question.

15 The no -- broke the civil protection order,
16 she's unblocked because she was court ordered
17 not to break the civil protection order. How
18 am I supposed to know if she breaks it if she's
19 blocked?

20 Q. Okay. What -- you know, what
21 precipitated your decision to take the overt
22 act of unblocking the number?

23 A. Did you not hear my last statement
24 which matched exactly what I said multiple
25 times before?

↑

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1 Q. I guess I didn't understand it.

2 A. There is a legal civil protection
3 order against your client, Lynette Preston,
4 which states she may not contact me whatsoever.
5 The only way to keep that accountable to know
6 if she's contacting me is to unblock her.

7 Q. But if she's blocked, it's
8 impossible for her to contact you? It's only
9 possible for her to futilely attempt to contact
10 you; right?

11 A. Again, another great statement. You
12 got any questions? Do you not know how to ask
13 a question?

14 Q. Well, your testimony was that you
15 unblocked her, so you would know if she is
16 breaking the protection order; right?

17 A. My testimony was there's a civil
18 protection order against her, and to know
19 whether she is actually breaking that civil

20 protection order of actually contacting me she
21 is unblocked.

22 Q. But it's impossible for her to
23 contact you while blocked; right?

24 ATTORNEY SHOCHET: Form.

25 Objection to form.

↑

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1 THE WITNESS: How would it be
2 impossible? She's broken the civil protection
3 order in person time and time and time again.

4 There are many facets to this civil
5 protection order. You can roll your eyes as
6 much as you want. You already know what she's
7 done over and over again. She's been found
8 guilty over and over again.

9 She continues to block our way. He
10 continues to block our way into places where
11 they are to leave immediately. They're not
12 allowed to be anywhere near us within 500 feet.
13 Any public place, any private place, any public
14 road, any private road. They are not allowed
15 to have any contact with us whatsoever.

16 Just because I block her on the

17 phone doesn't mean she can't get on something
18 else to try to contact us with her many --
19 multiple fake accounts.

20 You want me to keep going on? You
21 obviously know she can contact me. She's done
22 it. She's been found guilty of it.

23 BY ATTORNEY MATZKIN:

24 Q. Okay. Now, let me clarify: So it
25 would be impossible for her to break the order

↑

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1 using the blocked phone number while blocked;
2 correct?

3 A. No. Incorrect. There's a million
4 different ways she can do it. Oh, let's think
5 of some. That's right. Her grandson was at
6 the property. Oh, that's right. The Levy
7 County Sheriff took her phone as evidence. She
8 has another phone.

9 She can contact me a million
10 different ways under different names, different
11 profiles. No, it's not impossible by any
12 stretch of the imagination. And she's known
13 and has a pattern of creating multiple profiles

14 and doing such things with multiple devices and
15 multiple electronics such as multiple phones,
16 just like when the Levy County Sheriff took her
17 phone as evidence when Cook got arrested for
18 brandishing a firearm at yet another person.

19 ATTORNEY MATZKIN: Can you
20 read back the question, Alyssa?

21 (Reporter read back from the
22 record.)

23 BY ATTORNEY MATZKIN:

24 Q. Using the blocked number; correct?

25 A. No, not correct. You can download

↑

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1 apps, change your number, get through blocks;
2 not correct in any stretch of the imagination.

3 Q. Okay. Is it your testimony she
4 violated the protective order using the phone
5 number that we're talking about while it was
6 blocked?

7 A. Oh, my goodness. The stupidity.

8 Q. But you just said that there's other
9 ways to get through a block. So while you had
10 her number blocked, is it your testimony she

11 committed a violation using that number?

12 A. The absolute asinine stupidity.

13 You're literally looking at the police report.

14 Q. Can you speak up?

15 A. My testimony is -- my testimony is
16 that your client contacted me breaking the
17 civil protection order that is placed on her.

18 Q. Okay. So my question is -- there
19 was a time when you had her number blocked.
20 We're talking about a particular phone number,
21 right, like, the number that you blocked that
22 you refer to --

23 A. Looks like it's right there.
24 (941) 249-2195.

25 Q. Okay. So you had blocked that at

↑

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1 some point in time; right?

2 A. Yes.

3 Q. Okay. Do you remember about when?

4 A. No.

5 Q. And then you unblocked it at some
6 point in time; right?

7 A. Yes.

8 Q. Do you remember about when?

9 A. No.

10 Q. And while it was unblocked after you
11 unblocked it, am I right that you received a
12 text message from her -- Ms. Preston from that
13 number?

14 A. Yes.

15 Q. And do you remember when you
16 received that text message?

17 A. Is there a date on the police
18 report?

19 ATTORNEY SHOCHET: Do you
20 remember without looking at the report?

21 THE WITNESS: Without looking
22 at the report? No.

23 BY ATTORNEY MATZKIN:

24 Q. Okay. Was it around the time of the
25 deposition -- her deposition in January?

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1 A. Without looking at the report, I
2 don't know.

3 Q. Do you remember what the text said?

4 A. Without looking at the report, I

5 don't know.

6 Q. Do you know if the violation is
7 depicted in the Zoom video deposition?

8 A. I don't understand this question
9 either.

10 Q. Is it your -- is the act of her
11 contacting you with that phone number in
12 violation of the order depicted in the video
13 during the deposition? Did she do it during
14 that deposition?

15 A. That I don't recall either.

16 Q. Do you recall mentioning that you
17 had recently reported four new violations of
18 the protective order?

19 A. Yes.

20 Q. And did you mention that on a
21 livestream or on a rerecorded YouTube video
22 within the last couple of weeks or so?

23 A. I don't recall.

24 Q. Well, what would you estimate when
25 that was, how long ago that you mentioned the

↑

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1 four new violations?

2 A. I don't recall, and I don't recall
3 whether it was prerecorded or a livestream.

4 Q. All right. So did you report four
5 violations of the protective order that aren't
6 already a subject of these reports that we've
7 been looking at?

8 A. Can you ask a clear question,
9 please.

10 Q. Did you recently report four new
11 violations of the Ohio protective order?

12 A. Yes.

13 Q. And how did you report them? Did
14 you visit the Levy County Sheriff's Office?

15 A. Levy County Sheriff Office came out
16 and got the information and the report from me
17 and the videos.

18 Q. And what precipitated their visit?
19 Did you make a phone call?

20 A. Yes.

21 Q. And do you remember when this was?

22 A. I don't know the exact date.

23 Q. Was it during your current period of
24 time being in Florida, or had there been, you
25 know, a time in Ohio in between when you made

1 that report and your current time?

2 A. During my time in Florida.

3 Q. And when did you arrive in Florida
4 last?

5 A. I don't remember the exact date.

6 Q. Was it less than a month ago?

7 A. No.

8 Q. Probably six weeks roughly?

9 A. I don't remember the exact date.

10 Q. Okay. And so after you arrived in
11 Florida, do you know how long after you arrived
12 you went to the -- you made that call, and then
13 the sheriff county -- Levy County Sheriff
14 visited your property?

15 A. Is there a question in there
16 somewhere?

17 Q. How long after you arrived in
18 Florida did the Sheriff's office visit you to
19 take this report of four violations?

20 A. I don't recall the exact date.

21 Q. Approximately?

22 A. I don't recall the exact date.

23 Q. So how did this begin? Did you pick

24 up the phone and call, "I want to report four
25 violations. Please send somebody over"?

↑

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1 A. I called Levy County Sheriff to
2 report a violation.

3 Q. And did they say, "Okay. We'll send
4 somebody over"?

5 A. Yes.

6 Q. And did they send somebody right
7 over then, or was it later in the day? The
8 next day?

9 A. They sent two officers over
10 immediately.

11 Q. And do you remember the names of the
12 officers?

13 A. No.

14 Q. Had you met either one of them
15 before?

16 A. I don't recall.

17 Q. Were they male or female?

18 A. Two males.

19 Q. Since then, have you come to learn
20 their names?

21 A. I don't recall.

22 Q. Okay. Is it on -- is it reflected
23 on the report?

24 A. I don't have a report yet. I still
25 have to FO -- I have to get the request for the

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1 report, and then it will be reflected on the
2 report.

3 Q. Okay. So how long did they -- how
4 long did they stay when they arrived?

5 A. I don't recall.

6 Q. Was it an hour or less?

7 A. It was less than an hour.

8 Q. And where did you speak with them?
9 Was it indoors or outdoors?

10 A. Outdoors.

11 Q. Can you describe the location?

12 A. One of my properties in Otter Creek.

13 Q. Yeah. Can you be more specific?

14 A. 351 Florida State 24, Otter Creek.

15 Q. Is that what's known as "The
16 schoolhouse?"

17 A. Some people call it the schoolhouse.

18 Q. So did you meet them at the gate of
19 that property where a visitor would have to
20 enter?

21 A. No.

22 Q. They were let in, or they entered
23 through the gate and then met you somewhere
24 else on the property?

25 A. Correct.

↑

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1 Q. Okay. And then did you have this
2 conversation standing outside standing up?

3 A. Yes.

4 Q. And were the two officers recording?
5 Do you know? Or just writing?

6 A. I do not recall.

7 Q. Okay. And you reported to them four
8 separate violations?

9 A. I gave them four separate videos to
10 report violations.

11 Q. And can you tell us about those four
12 videos, you know, the first of the four videos?

13 A. I don't know which order they were
14 in. No. 1 would be John Cook laughing, running

15 towards sheets, laughing about George having
16 cancer.

17 Another would be John Cook talking
18 to me at the edge of his property as he's
19 filming and then going, "Your Honor, Your
20 Honor, see this is what I got to go through
21 every day," which is communication with me.

22 Another is John Cook violating the
23 protection order at the post office.

24 Another is John Cook and Lynette
25 violating the protection order driving straight

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1 towards me as they see me on the road on North
2 Otter Creek Avenue. They see me. They stop.
3 Instead of turning around, they drive straight
4 towards me.

5 ATTORNEY MATZKIN: And are
6 those videos -- can you produce those videos to
7 me by my request now, or do I need to go
8 through a formal procedure to request them?

9 ATTORNEY SHOCHET: You're
10 going to need to go through a formal procedure.

11 BY ATTORNEY MATZKIN:

12 Q. Okay. So the video you described of
13 the -- well --

14 ATTORNEY MATZKIN: Well,
15 Mr. Shochet, I would say that they're
16 responsive to the already-propounded requests,
17 but we can discuss that.

18 BY ATTORNEY MATZKIN:

19 Q. So the video about the -- you
20 mentioned the post office. Was one of them
21 about the post office?

22 ATTORNEY MATZKIN: I'm sorry.
23 Alyssa, can you repeat the description of the
24 four videos? Let's have her repeat the
25 description of the four videos, please.

↑

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1 Mr. Hales' description of the four videos.

2 (Reporter read back from the
3 record.)

4 BY ATTORNEY MATZKIN:

5 Q. Got you. Okay.

6 So the laughing about cancer,
7 running towards the sheets. Can you describe
8 that in a little more detail? What do you mean

9 by "running towards the sheets"?

10 A. Which part don't you understand?

11 "Running?" "Towards?" Or "sheets"?

12 Q. Which sheets?

13 A. You're going to play dumb like you

14 don't know they've got sheets hung up right

15 now?

16 Q. So when did this violation --

17 alleged violation occur?

18 A. I don't have the exact date. I'd

19 have to get the report.

20 Q. And when you say, "He was laughing

21 about George having cancer, running towards the

22 sheets," how did you witness this?

23 A. Well, I film every time I have to

24 drive by there for my own protection and

25 accountability, and I have ears, and I can hear

↑

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1 it.

2 Q. Oh. So you were driving by filming.

3 And were you filming with your arm out the

4 window holding a cell phone?

5 A. I film the only way I know how to

6 film with something in my hand. With a cell
7 phone.

8 Q. Okay. So on this particular day,
9 you were driving on the road between the
10 property -- between your property and their
11 property; right?

12 A. Correct.

13 Q. And were you driving in the
14 direction such that the driver side was closer
15 to their side or your side?

16 A. Their side.

17 Q. Okay. So you're driving by, and
18 you're holding the cell phone out the window,
19 filming for protection and accountability;
20 correct?

21 A. Correct.

22 Q. And tell me what happened then that
23 constitutes the violation.

24 A. We already covered this.

25 Q. Well, I'm asking you to now describe

↑

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1 it now that I've set the scenario.

2 A. We literally have already covered

3 this multiple times. Running towards the
4 sheets, laughing, going, "Ha, ha, ha, ha,
5 George cancer." Communication.

6 Q. Running in what direction?

7 A. Breach of civil protection order.
8 Communication. Intentional. Willingly.
9 Knowingly communication. Literally running
10 towards so I would hear him. Literally running
11 towards so I will see him. Literally
12 willingly, knowingly violating the civil
13 protection order. Not turning around like he's
14 supposed to. Not minding his own business like
15 he's supposed to. Taunting, making contact
16 with me. Intentionally making contact with me.

17 Q. Are you finished?

18 Where was he running from? What
19 direction, or what building?

20 A. Behind the sheets.

21 Q. So you were driving by, and he
22 emerged from behind the sheets, so you could
23 see him?

24 A. Yes.

25 Q. And then he moved in what direction?

1 Toward the road? To the left? To the right?

2 A. Towards me, towards the road.

3 Q. I see. So you're driving by. Your
4 cell phone is out the window, and he shows up
5 from behind the sheets and starts walking
6 towards the road.

7 And was he filming? Was he holding
8 a cell phone?

9 A. I do not know.

10 Q. Okay. But he was walking towards
11 the road and saying what?

12 A. Oh, my goodness. We already covered
13 this. Move on. Ask a relevant question.

14 Q. So he emerged from behind the sheet
15 and began walking towards the road saying what?

16 A. I already answered this. Ask
17 another question.

18 Q. I need you to answer it now.

19 A. I already answered it multiple
20 times. As a matter of fact, you could probably
21 answer it. You know what I said.

22 ATTORNEY MATZKIN:

23 Mr. Shochet, it's a really simple question.

24 Would you mind asking him to just give me a

25 simple answer?

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1 ATTORNEY SHOCHET: He answered
2 it two times. Even I can memorize what he
3 said.

4 BY ATTORNEY MATZKIN:

5 Q. Mr. Hales, what did Mr. Cook say as
6 he walked from behind the sheets towards as you
7 were driving by filming?

8 ATTORNEY SHOCHET: All right.
9 One more time, then that's it.

10 THE WITNESS: He was laughing
11 out loud to make sure I could hear him, which
12 is covered on the cell phone video footage,
13 mocking George having cancer.

14 BY ATTORNEY MATZKIN:

15 Q. But I want words spoken, not your
16 characterization.

17 A. Well, you can have the video when
18 you go through the proper channels to get the
19 video, and you'll hear them.

20 Q. But do you remember what he said,
21 not just a --

22 A. I do not have the video right now.

23 Q. Do you remember what he said? Do
24 you remember what he said?

25 A. I just told you what he said for the

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1 third time, and I'm not going to answer it
2 again.

3 Q. All right. And the second violation
4 that you reported. You said that Mr. Cook was
5 on the edge of his property yelling, "Your
6 Honor, this is what we have to go through"?

7 Is that correct?

8 A. Oh, my goodness. We finally got a
9 question out of this statement. Wow.

10 Yes.

11 Q. And, again, let's set up this
12 scenario. Where were you at this time?

13 A. Driving.

14 Q. Was this a different day than the
15 first one?

16 A. Yes.

17 Q. Okay. So was it the same thing,
18 where you were driving on the road filming for

19 accountability and protection?

20 A. Yes.

21 Q. And also with your side -- the
22 driver side closer to their property?

23 A. Yes.

24 Q. And as you were driving by, you saw
25 Mr. Cook on his property?

↑

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1 A. Yes.

2 Q. And did you stop or slow down?

3 A. I always slow down when there's an
4 individual near the road. Not to mention they
5 have publicly posted stating that I go 65, 70
6 miles per hour, that they even posted signs,
7 "Slow down." They posted signs. You don't
8 want me to slow down? So, yes, I slowed down.

9 Q. Okay. And so tell me, then, what
10 happened that constitutes a violation?

11 A. Communication. Contact.

12 Q. Well, again, you're characterizing,
13 so I'd like you to give me the facts.

14 What exactly did he do or say?

15 A. And, again, I already told you, and

16 this is the last time I'm going to answer the
17 question. He is filming me as I'm filming him
18 and going, "Your Honor, this is what I have to
19 go through every day." There is no "Your
20 Honor." The communication is with me. I'm the
21 only person there.

22 Q. And then you talked about a
23 violation occurring at the post office?

24 A. Nice statement. You got a question?

25 Q. Yes. Please tell me about that

↑

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1 violation.

2 A. He violated. He was within the 500
3 feet at the post office.

4 Q. Do you recall when?

5 A. No.

6 Q. Was this on a different day than the
7 first two we've just discussed?

8 A. Yes.

9 Q. And did you arrive at the post
10 office after he was there or the other way
11 around?

12 A. I arrived at the post office after

13 he was there.

14 Q. So you parked your vehicle, did you?

15 A. No. I was in the road. He was in
16 the road on Route 24. He was driving. I was
17 driving. And he already knows we're at the
18 post office every day roughly at 2:30 dropping
19 off packages, and he went there at 2:30. He
20 pulled in. I stayed on the road and told him
21 to "leave. Leave now." He got back in his
22 vehicle. Spit rocks at my vehicle. And then
23 did not leave within 500 feet. He went to the
24 next parking lot, which is less than a hundred
25 feet away.

↑

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1 Q. So you and he were both in your
2 vehicle. Like you were behind him driving, and
3 he knew you were behind him, driving, going to
4 the post office?

5 A. Yes.

6 Q. And so it's your testimony that he
7 then pulled into the post office knowing that
8 that would create this issue of a violation?

9 A. And he made verbal contact, as well.

10 Q. And what was the verbal contact?

11 A. I'd have to look at the video again.

12 I don't recall.

13 Q. Okay. And then you say you didn't
14 pull into the parking lot, but you said
15 something to them verbally to leave?

16 A. I told them to "Leave. Leave now."

17 Q. And then you said that he left but,
18 like, spit rocks, meaning, like, he peeled out?

19 A. Yes, to kick rocks at my vehicle.

20 Q. Did it cause any damage?

21 A. Not to my knowledge.

22 Q. And then you say he drove only a
23 hundred feet away to another parking lot?

24 A. Yes.

25 Q. Okay. And then what did you do?

↑

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1 A. I continued to film until he left.

2 Q. So you mean he left from that spot
3 that he originally driven to hundred feet away?

4 A. Eventually, because I was continuing
5 to film him.

6 Q. And how long did you --

7 A. The whole accountability thing.
8 When he's breaking the law. When he's breaking
9 civil protection orders which he should have
10 immediately got in his vehicle and left within
11 500 feet, but he chose not to -- willingly,
12 knowingly chose not to. He chose to park less
13 than hundred feet away to still be breaking the
14 civil protection order until two people --
15 myself and Deanna West -- continued to film him
16 until he eventually left.

17 Q. Was Deanna West in the vehicle in
18 with you?

19 A. No.

20 Q. Where was she? How did she come
21 upon the scene?

22 A. She was in her own vehicle.

23 Q. But was she making the trip to the
24 post office in conjunction with you?

25 A. Yes.

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1 Q. So you were, like, both delivering
2 packages?

3 A. Yes.

4 Q. And so how long did Mr. Cook remain
5 a hundred feet away and then finally leave?

6 A. I don't recall. I'd have to review
7 the video.

8 Q. But you do recall being --

9 A. And let's be very clear: Even if
10 he's not -- even if he's there for a second,
11 two seconds -- I don't care if it's five
12 minutes, ten minutes. It's a break and a
13 breach and a violation of the civil protection
14 order.

15 One second, half a second is a break
16 and a breach and a violation of the protection
17 order. I can care less about the time. And
18 frankly, you should care less about the time.
19 You should be telling your clients to stay as
20 far away from as possible so they don't end up
21 breaking the law.

22 Q. When you got the civil protection
23 order in Ohio, that was after you had filed but
24 been denied one in Florida; am I right?

25 A. I never filed for one in Florida. I

↑

1 was not denied one in Florida.

2 Q. So it's your testimony that you did
3 not apply for a protection order in Florida?

4 A. I eventually applied for a
5 protection order in Florida once I had my civil
6 protection orders in Ohio. But the way that
7 you phrased the question was the understanding
8 that I applied for one in Florida, got denied,
9 therefore, went to Ohio.

10 That was completely and totally
11 incorrect.

12 Q. Okay. So to be clear, your
13 testimony is there's no record of any filing by
14 you in Florida prior to when you went to Ohio
15 to get a protective order?

16 A. Correct.

17 Q. And then you said you did file after
18 you got the Ohio protective order. You said
19 you tried to file for a Florida protective
20 order?

21 A. Correct.

22 Q. Okay. And where did that get filed?

23 A. Levy County.

24 Q. And what happened with that
25 application?

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1 A. Judge Craig DeThomasis sealed it and
2 denied it.

3 Q. So there is a -- albeit a sealed
4 record, of a filing by you seeking a protective
5 order in Florida that was ruled on and denied
6 by Judge DeThomasis?

7 A. Correct. Illegally. Both state
8 law --

9 Q. Did you --

10 A. -- state -- I'm not finished -- both
11 state law was broken by Judge Craig DeThomasis
12 and both federal law was broken by Judge Craig
13 DeThomasis. And then he sealed it so nobody
14 would have any access to it. But then I paid
15 to have it unsealed to find out exactly what he
16 did.

17 Q. Has it been unsealed?

18 A. To me; not to you.

19 Q. So you have -- well, even if it were
20 sealed and not unsealed, you still, of course,
21 have a record or file of what you filed, right?
22 An electronic copy; right?

23 A. Yes.

24 Q. So will you produce that in

25 discovery?

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1 ATTORNEY SHOCHET: I need to
2 see your request, Counsel.

3 ATTORNEY MATZKIN: Okay. I'm
4 pretty sure it was responsive to other
5 requests, but if we need to, we will.

6 BY ATTORNEY MATZKIN:

7 Q. So Ms. Preston was pro se,
8 unrepresented by counsel, during the
9 proceedings in the Ohio court, the evidentiary
10 proceeding; correct?

11 A. I do not know Ms. Preston's legal
12 background or who is helping or representing
13 her except for you.

14 Q. Well, in the Ohio proceeding that
15 you filed and were granted a protective order,
16 to your knowledge, did she have a counsel of
17 record at the time of that proceeding?

18 A. Within the courts, she did not have
19 a counsel of record.

20 Q. And the fourth new -- fourth
21 violation that you testified to recently
22 reported involved them driving towards you on
23 the road; correct?

24 A. Yes.

25 Q. Okay. Can you give us more details

Page 203

1 about that, please. What road?

2 A. North Otter Creek Avenue.

3 Q. And when you say, "driving towards
4 you," were you in a vehicle, or were you on
5 foot?

6 A. Vehicle.

7 Q. And were you driving away from your
8 property or towards it going back home?

9 A. Both. I have multiple properties.
10 I was leaving one property going to another
11 property.

12 Q. Okay. And so tell us what the
13 violation consisted of.

14 A. The violation consisted of not being
15 more than 500 feet away from me on any public
16 or private road. They stopped knowing that

17 they were going to break the violation.
18 Instead of backing up and removing themselves,
19 they broke it intentionally, willingly,
20 knowingly. They stopped. They knew they were
21 going to break it. And then they moved
22 forward.

23 Q. Okay. I've got to understand this a
24 little better. So were you saying that you
25 were driving, and then they were coming in the

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1 other direction?

2 A. Correct.

3 Q. Okay. Were they -- did you, you
4 know, surmise they were coming in the other
5 direction to, you know, go back to their
6 property?

7 A. Doesn't matter. Where in the civil
8 protection order do you read it matters where
9 they break and violate? It matters based on
10 where they're going, where they've been. It
11 matters based on how much time. It matters

12 based -- none of that matters, so stop asking

13 stupid questions. You're sounding like an

14 ignorant fool.

15 The only thing that matters is they
16 broke and violated the civil protection order.
17 The only thing in the civil protection order is
18 they must stay 500 feet away from myself and
19 George at all times. No matter where they're
20 headed, no matter where they're going, no
21 matter where they've been, 500 feet away on
22 every public and private road. End of story.

23 Q. So when you saw them, they were
24 coming in in the other direction, and let's say
25 you stopped right there, and they were on their

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1 way home. They would have had to pass you; am
2 I right?

3 A. Are you that incompetent? No, they
4 don't pass me. They turn around, and they go
5 the other way to make sure that they are 500
6 feet away from me, per the civil protection
7 order.

8 They are not legally allowed to be
9 within 500 feet of me on any public or private
10 road --

11 Q. That -- I'm not --

12 A. -- public or private building, any
13 public or private place. They cannot be within
14 500 feet of me.

15 I don't care if they're driving
16 home. I don't care if they're driving to my
17 place. I don't care where they're driving,
18 where they came from, where they're going.
19 They cannot be within 500 feet of me. End of
20 story.

21 Q. Okay. You finished?

22 A. Did it sink into your head yet?

23 Q. So what I'm really trying -- you
24 know, my question doesn't really go to anything
25 of what you were, you know, just going on

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Page 206

1 about.

2 My question is -- what I'm really
3 trying to do is envision the situation
4 physically the location of the vehicles. Okay?

5 So they're coming in the other
6 direction, and if they were from the point you
7 saw them, assuming they're just -- and they

8 didn't turn around and let's say you weren't
9 there or they didn't care that you were there
10 and they just wanted to go home and they didn't
11 change directions, they would have to pass you
12 to reach that destination, the point where you
13 were located; is that correct?

14 A. It makes no difference; any type of
15 destination. They are legally bound to stay
16 within 500 feet away from me.

17 Q. So I'm asking if you can just tell
18 me -- what I want to understand is if they were
19 just going home and continued on their routes
20 without regard to the protection order, they
21 would have had to go right past where you were
22 at that moment of time when you spotted them?
23 Yes or no?

24 A. What I want you to understand is
25 where I was. They were breaking and violating

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1 the civil protection order. They may not
2 legally be within 500 feet of me. Nothing else
3 matters.

4 ATTORNEY SHOCHET: Let the

5 record reflect Counsel was laughing and smiling
6 during Mr. Hales' response.

7 ATTORNEY MATZKIN: So,
8 Mr. Shochet, I wonder if you can ask Mr. Hales
9 to give me a direct answer to the question I'm
10 actually asking, which is, if you take
11 Mr. Hales' location at the moment in time he
12 spotted them coming in the other direction and
13 they were just going to continue on to go home,
14 would they have to pass him? Would they have
15 to go right by him?

16 That's the question. Can he answer
17 that?

18 THE WITNESS: And the answer
19 is legally, they must remove themselves.
20 That's the answer.

21 BY ATTORNEY MATZKIN:

22 Q. Did they pass you?

23 A. That's the law. That's the law.

24 Q. Did they drive by you?

25 A. I'm not done. The answer is they

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1 legally must remove themselves from the

2 situation. That's what their consequences of
3 their actions have done as they have not only
4 stalked me. They have harassed me. They have
5 extorted me. They have constantly put my life
6 in fear, my loved ones in danger. The
7 consequences of their action under the law,
8 civil protection, means they remove themselves.
9 That's what they needed to do.

10 Q. All right. So what did they do?

11 A. Violated and broke the civil
12 protection order.

13 Q. But that's your characterization.
14 So I want to know factually. So you spotted
15 them. How far away were you -- how far apart
16 was your vehicle from their vehicle when you
17 spotted them coming the other direction?

18 A. I don't know. I don't go out in the
19 middle of North Otter Creek Avenue dragging a
20 tape measurer with my leg wrapped up to my
21 crotch.

22 Q. And so when you spotted them, did
23 their vehicle continue to come closer to you?
24 Did they continue to drive towards you? I
25 believe they did, you said; is that correct?

1 A. I've already answered this multiple
2 times. Can you ask an actual question?

3 Let's see. Let's go -- let's have
4 the civil protection order actually answer this
5 question. "Respondent shall not initiate or
6 have any contact with the protected persons
7 named in this order and the residences,
8 businesses, places, employment, schools, day
9 care centers, child care providers. Contact
10 includes, not limited to landline, cordless,
11 cellular, digital tech telephone, text instant
12 messaging, fax, E-mail, voicemail, delivery
13 services, social media, blogging, writings,
14 electronic communication, a personal message,
15 communication by any other means directly or
16 through another person.

17 "Respondent may not violate this
18 order even with the permission of the protected
19 person."

20 ATTORNEY MATZKIN: Alyssa, I'm
21 going to give you 30 seconds.

22 THE REPORTER: I'm good,
23 Counsel. Thank you.

24 THE WITNESS: You're doing a
25 great job, Alyssa.

↑

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1 BY ATTORNEY MATZKIN:

2 Q. During this alleged violation of the
3 Ohio order, did they pass you in their vehicle?

4 A. Yes.

5 Q. Thank you. And you continued on
6 after they passed you, and thereby, your cars
7 -- your vehicles then became further apart at
8 that point in time; right?

9 ATTORNEY SHOCHET: Objection
10 to form.

11 You can answer, if you understand
12 the question.

13 BY ATTORNEY MATZKIN:

14 Q. When they passed you, were you
15 moving, or were you stationary?

16 A. Moving.

17 Q. Okay. And were you on the right
18 side, and they were on the right side of the
19 road, your right side, and they were on their
20 right side?

21 A. Yes.

22 Q. Okay. And did you have your cell
23 phone out the window for accountability and
24 protection?

25 A. Yes.

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1 Q. And did you see who was in the
2 vehicle?

3 A. Yes.

4 Q. And who was in the vehicle?

5 A. John Cook, Lynette Preston.

6 Q. And anybody else?

7 A. Not that I saw.

8 Q. Who was driving?

9 A. I'd have to go back and look at the
10 video again to remember.

11 Q. And was there anyone in your vehicle
12 with you?

13 A. No.

14 Q. And did anybody say anything, either
15 you or Michelle Preston or John Cook?

16 A. No.

17 Q. Were the windows -- was there a

18 window down?

19 A. No.

20 Q. Do you know that they were aware it
21 was you driving towards them?

22 ATTORNEY SHOCHET: Objection
23 to form. Calls for speculation.

24 But you can answer, if you knew what
25 they were aware of.

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1 THE WITNESS: Pretty easy to
2 know --

3 BY ATTORNEY MATZKIN:

4 Q. The question is: Do you know if
5 they were aware that it was you driving towards
6 them?

7 A. Pretty easy to know what they're
8 aware of as they have outlined and documented
9 the make and model and color of my vehicle, not
10 only stating that I pass by them filming
11 hundreds of times a day, which is not true
12 whatsoever. I pass by when is needed to pass
13 by.

14 That they have literally documented

15 in court evidence, court documents my vehicle.
16 They know my vehicle. They stopped when they
17 saw my vehicle. And instead of going in the
18 side street and turning around, which they had
19 every opportunity to do, they decided to
20 willingly and willingly violate the civil
21 protection order.

22 Q. All right. SO there was a side
23 street. Now, was the side street between you
24 and their vehicle at the moment you spotted
25 them, or had they already passed it?

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1 A. They did not pass it.

2 Q. So in the space between the front of
3 your vehicle and the front of their vehicle at
4 the moment in time when you spotted them -- and
5 presumably, they spotted you -- you're saying
6 that there was a side street that they could
7 have turned into?

8 A. Yes.

9 Q. And where was that side street
10 relative, you know, to your car? Was it closer
11 to yours or to theirs?

12 A. They were right at it.

13 Q. Would that have been a right turn or
14 a left turn for them?

15 A. That would have been a right turn.

16 Q. Meaning, if you were going to turn
17 into that side, it would have been a left turn?

18 A. Yes.

19 Q. All right. And what is that side
20 street exactly?

21 A. I don't know the name.

22 Q. How far from the entrance to Turtle
23 Purgatory was this side street?

24 A. I don't go out and measure.

25 Q. Well, was it, let's say, you know,

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1 less than a tenth of a mile?

2 A. Again, I don't go out and measure.

3 Q. Well, it was right -- you had just
4 left your property; am I right? And they were
5 on their way home; right?

6 A. You sure do make a lot of
7 assumptions about where they were going, what
8 they were doing, what I was doing.

9 But, yes, I was leaving my property.

10 I have no idea where they were going. And it
11 doesn't matter because they violated knowingly,
12 willingly the civil protection order. They
13 cannot be within 500 feet of me. They know my
14 vehicle. They know everything about my
15 vehicle. And they willingly, knowingly
16 violated.

17 It doesn't matter where they were
18 going, so you can stop saying they were going
19 home. I don't care where they were going. I
20 don't care where they were coming from. None
21 of it matters. The Court isn't going to care
22 about it either when it's in Ohio court for yet
23 another violation. What they're going to care
24 is did they violate, and the answer is, yes,
25 they violated it again.

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1 Q. So if they had turned down the side
2 street, you're saying that that would have
3 avoided the violation?

4 A. If they would have turned down the
5 side street -- that side street feeds right out

6 into Route 19, Route 98 -- they would have
7 avoided it.

8 Q. Had you ever gone somewhere because
9 you learned or were aware that they were there
10 just for the purpose of using the Ohio
11 protection order to force them to leave?

12 A. No.

13 Q. Well, have you ever said on any of
14 your YouTube videos that you would go to one
15 location or another and there -- enforce the
16 Ohio protection order by making them leave?

17 A. I've clearly stated that I will live
18 my life without consequences because I'm not
19 the one that's been found guilty. I'm a
20 reseller. I go to flea markets. I buy from
21 sellers and then resell. That is part of a
22 major part of my business.

23 And so if they are at a flea market
24 and I show up at the flea market, they must
25 remove themselves from the flea market.

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1 Now, as such, I've not yet gone to
2 that flea market as I've been busy and out of

3 town with other resale opportunities. But
4 there will be a day where I will be at that
5 flea market because I attend that flea market.
6 I buy from other sellers, and then I resell,
7 which means they will be in violation, and
8 therefore, they must leave.

9 Q. Okay. So to be clear, you have not
10 but you do fully intend to attend the -- what's
11 it called? The flea market? Is it Chiefland?

12 A. I fully intend to live my life
13 normally as I always have without
14 repercussions, without consequences, because I
15 haven't broken the law. They have.

16 Q. What's the name of the flea market
17 we're talking about?

18 A. You tell me.

19 Q. I don't know. The one where
20 Ms. Preston --

21 A. I don't know the name either.

22 Q. All right. But it's your intention
23 at some point, you fully intend to go to that
24 flea market where Ms. Preston has a booth
25 because you have business there, and when you

↑

1 do, your intention is to make sure that the
2 Ohio order is enforced and that she's made to
3 leave; am I correct?

4 A. My intention when I have business
5 there is to make sure that I'm protected and
6 the law isn't broken.

7 Q. And that would, in this case, mean
8 requiring her to leave on threat of contempt of
9 the Ohio order; correct?

10 A. Those are the consequences of her
11 being found guilty, her breaking the law.

12 Q. But I'm saying prospectively now, in
13 the future, if and when you go to this flea
14 market, it's your intention to require her to
15 leave on threat of contempt of the Ohio order;
16 am I right?

17 A. Whether I go to a town hall meeting,
18 whether I go to Walmart, whether I go to
19 McDonald's, whether I go to the Chiefland Flea
20 Market, whether I go home on my own road, if
21 they violate, they're going to be reported.

22 Q. Okay. But I want to know
23 specifically about the flea market. So it is
24 your present intention to, at some time in the

25 future, go there for business, and when you do,

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1 you're going to enforce the Ohio order?

2 A. I've answered the question multiple
3 times. Move on, or ask a new question.

4 Q. And do you know -- do you have a
5 time frame of when you expect to invoke your
6 right to go to the flea market and enforce the
7 Ohio order, question mark?

8 A. It has nothing to do with enforcing
9 an Ohio order. It has everything to do with
10 protecting myself from these monsters.

11 Q. So do you have a time frame when you
12 plan -- do you have a plan of when you might go
13 do business at the flea market and then this
14 issue may arise?

15 A. I have no time frame. Whenever
16 business is to the point where I need to go and
17 buy and purchase from sellers at the flea
18 market, that's when I'll be there.

19 Same as I don't have a time frame of
20 when I'm going to Walmart, and nor am I going
21 to confer with your clients to say, "I'm going

22 to Walmart right now." And yet they have
23 broken at Walmart, as well.

24 Your client, Lynette Preston, double
25 birded me, flicked me off with both hands in

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1 the parking lot of Walmart. You think I'm
2 going to go to her and say, "Hey, I'm going to
3 Walmart now. Please don't be there"? No. She
4 is the one that has to immediately leave.

5 So I will live a life normally as my
6 life should be normal except they have
7 terrorized our lives to where it's no longer
8 normal, to the point where we have to put our
9 own piece of property up for sale just to get
10 away from their insanity, just to get away from
11 the harassment, just to get away from their
12 threats, just to get away from they're going to
13 pop a cap in my ass. They're going to shoot me
14 in the face, and they're going to feed me to
15 the gators.

16 I will live a life normally, as I do
17 every single day, and protect myself from your
18 clients.

19 Q. The -- so she flipped you the double
20 bird at Walmart?

21 Mr. Hales, she flipped you the
22 double -- Ms. Preston flipped you the double
23 bird at Walmart?

24 A. You already have that answer. I've
25 already stated it.

↑

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1 Q. Was that the subject of a violation
2 that you reported?

3 A. We did in Ohio.

4 Q. When did the flip the bird at
5 Walmart incident occur?

6 A. I don't have the dates in front of
7 me.

8 Q. Was that -- was that brought to the
9 Court in Ohio already filed as a contempt?

10 A. It's already in the Ohio court. The
11 magistrate is ruling on it. We're waiting for
12 the ruling.

13 Q. Oh, that's one of the two contempts
14 that are still out there; am I right?

15 A. As I just stated, the magistrate is

16 wait -- we're waiting on the magistrate to make
17 the final ruling.

18 Q. Okay. Specifically about whether
19 there was a violation from her at Walmart
20 flipping the double bird; correct?

21 A. As I just stated, we're waiting on
22 the magistrate's ruling.

23 Q. And also on another incident, a town
24 hall incident; correct?

25 A. As I just stated, we're waiting for

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Page 221

1 the magistrate's ruling.

2 Q. I understand there's a ruling
3 waiting, and I'm wondering -- my question is --
4 you're awaiting the ruling on whether there was
5 a violation from the Walmart double bird
6 flipping incident, No. 1, and also a violation
7 of the order by virtue of being present at town
8 hall, No. 2.

9 Are those the two rulings you're
10 awaiting A magistrate ruling on?

11 A. There are so many violations of the
12 civil protection order by your clients, I don't

13 even -- can't even keep straight which one is
14 which ruling at what time.

15 But I will tell you, there will be
16 another filing for contempt on the four that we
17 just discussed.

18 Q. I got you. All right. So let's
19 see.

20 You have shown a lot of private
21 messages and chats that you've obtained from
22 people who were party to those private messages
23 and chats with Michelle Preston; am I right?

24 A. Who's Michelle Preston?

25 Q. Lynette Preston. Am I right?

↑

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1 A. There we go. That's better. Yeah.

2 Use her real name. Lynette Preston. Michelle

3 Preston is the daughter of Lynette Preston, and

4 Lynette Preston is using her daughter's name to

5 scam.

6 Q. Can you pronounce her name "Lynette"

7 like it's supposed to be?

8 A. No. I have a northern accent. I

9 apologize. You should probably understand

10 that. You're from up north, as well.

11 Q. So am I right, though, that you have
12 shown on YouTube videos on your own cell phone
13 screenshots or actual forwarded messages and
14 chats between people and Michelle -- and
15 Lynette Preston? Yes or no?

16 A. Can you show me what you're
17 referring to?

18 Q. No. This is just a general
19 question. Have you on occasion on YouTube
20 shown private chats and messages of which
21 Lynette Preston was a party?

22 A. No, I haven't shown anything
23 private. It's been made public. It's evidence
24 in court. It's -- it's evidence for anybody to
25 make a public record request.

↑

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1 Q. Well --

2 A. None of it is private. If it's
3 made -- if it's made known to me, how can it be
4 private? So let's actually call it what it is.
5 It's a publication by Lynette Preston.

6 Q. Well, no. No. I'm specifically

7 asking about your publication of private chats
8 and messages between Lynette Preston and other
9 parties who provided them to you?

10 A. There is no privacy, so drop the
11 word "private." There is no privacy. It's the
12 internet. Anything can be subpoenaed. Even
13 text messages can be subpoenaed. There is no
14 privacy whatsoever. So stop saying "privacy."

15 Q. Fair enough.

16 A. There's nothing private at all.

17 Q. Fair enough. So let me retract
18 that.

19 Have you shown on your YouTube
20 channel messages and chats of which Michelle --
21 Lynette Preston was a party with any other
22 individual that were originally just between
23 her and the other individual?

24 A. How am I supposed to answer whether
25 it's between her and another individual? Ask a

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1 better question.

2 Q. Have you received -- have you
3 received --

4 A. You can laugh. You're the one that
5 looks like the fool here. You can can't even
6 formulate a full question. So you can giggle
7 and laugh all you want. You're a party.
8 You're complacent within this. And you're
9 going to be held accountable for it, as well,
10 with your "Anti What the Hales ecosystem."
11 So get ready for that, buddy.

12 Q. So -- gee wiz. I can't remember
13 what my question was.

14 ATTORNEY MATZKIN: Alyssa, I'm
15 sorry --

16 THE WITNESS: I
17 honestly --

18 (Indecipherable crosstalk.)

19 THE WITNESS: -- that you can
20 even think, to be honest.

21 ATTORNEY MATZKIN: -- would
22 you mind?

23 THE REPORTER: I'm sorry. I
24 couldn't hear you.

25 ATTORNEY MATZKIN: I can't

↑

1 even remember what my question was. Would you
2 mind?

3 (Reporter read back from the
4 record.)

5 BY ATTORNEY MATZKIN:

6 Q. So do you understand the question?

7 A. And I already followed up, and I
8 said, "can you show me what you're referring
9 to?"

10 Q. Well, have you ever talked about
11 having moles on your YouTube videos? Have you
12 ever said that you have moles providing you
13 information?

14 A. Good question. How many moles do
15 you think there potentially is? Do you
16 think -- do you think there's moles in your
17 private conversations right now?

18 Q. Mr. Hales, I'm asking the questions.

19 So do you acknowledge saying on your
20 YouTube videos on more than one you occasion
21 that you have moles providing you with
22 information that you're then disseminating
23 publicly on your YouTube videos?

24 A. Well, let me answer this question
25 since you stated that you're the one asking the

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1 questions.

2 Q. It's a yes-or-no question.

3 A. Because what you're doing is making

4 statements, and then I have to prompt you to

5 actually ask a question.

6 I don't need moles because your

7 clients post everything out there with fools

8 such as you putting everything out there on the

9 internet. Nobody needs a mole. Nobody needs

10 anything sent to them when people such as you

11 continue to incriminate yourself within this

12 conspiracy of defamation with your clients who

13 needs a to mole anything?

14 Yeah. I've got moles. They're all

15 over my body. I have freckles, too.

16 Q. So have there been people who have
17 contacted you and said -- and shared with you
18 their messages and chats with Lynette Preston?

19 A. Rephrase the question, please.

20 Q. Have there been people who have
21 contacted you and shared with you their chats
22 and messages with Lynette Preston?

23 A. There have been people who have
24 shared communication from Lynette Preston for
25 evidence in court.

↑

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1 Q. Okay. And does that include some of
2 which you've shown holding your cell phone up
3 to the camera on YouTube videos?

4 A. I have no idea.

5 Q. Okay. I'd like to know the names of
6 the individuals that have provided you this
7 evidence for use in court of communications
8 with Lynette Preston.

9 ATTORNEY SHOCHET: Well, I'm
10 going to say that some of those names are
11 confidential work product.

12 So if you know of anyone that
13 hasn't -- that I --

14 ATTORNEY MATZKIN: Listen --

15 ATTORNEY SHOCHET: -- that's
16 attorney/client privilege. Hold on. You keep
17 wanting to invading attorney/client privilege,
18 which you're opening yourself up for that. So
19 same instruction as before.

20 THE WITNESS: Yeah. There's
21 no one that is outside the bounds of the
22 attorney/client privilege.

23 ATTORNEY SHOCHET: Then don't
24 answer it.

25 ATTORNEY MATZKIN: I'm going

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1 to have to follow up here.

2 BY ATTORNEY MATZKIN:

3 Q. So is it your testimony that --
4 strike that.

5 Has there been a nonlawyer who has
6 contacted you and said, "I would like to share
7 -- I have information to share in the form of
8 my messages and chats and conversations with
9 Lynette Preston"?

10 ATTORNEY SHOCHET: You can
11 answer that. Contacted you, not me.

12 THE WITNESS: Ask the question
13 again. Rephrase it.

14 BY ATTORNEY MATZKIN:

15 Q. So the question is: Have there been
16 individuals who have contacted you to share

17 with you those individuals' conversations,
18 messages, chats that they had with Lynette
19 Preston?

20 ATTORNEY SHOCHET: That they
21 had with Lynette Preston.

22 THE WITNESS: Contacted me
23 personally?

24 BY ATTORNEY MATZKIN:

25 Q. Yes.

↑

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1 A. Individuals don't contact me
2 personally. They may send a message and say,
3 "Hey, look at this." "Hey" -- you know, and
4 it's all to fans of What the Hales and it all
5 goes into an inbox.

6 Q. Okay.

7 A. But nobody -- nobody has
8 particularly contacted me personally.

9 Q. So who sent messages that went into
10 the What the Hales inbox that you then used and
11 showed on YouTube?

12 A. Again, I don't have a list. If you
13 were going to ask this question, you should

14 have prepped beforehand so I can be ready to --
15 actually with a list to answer this question.
16 So I have no recollection right now.
17 I'm not looking at anything. I have nothing in
18 my hands. I don't have my cell phone. I don't
19 have my E-mails. I don't have anything. You
20 should have better prepped.

21 Q. So you don't remember the names of
22 any people that have shared with you their
23 conversations that they had had with
24 Michelle -- Lynette Preston?

25 A. You should have better prepped.

↑

Page 230

1 Q. Okay. So is it your testimony,
2 though, that -- and without getting into
3 attorney/client privilege, though -- that you
4 learned there are individuals you have learned
5 of information from or you have obtained
6 information from, but that you're refusing to
7 identify because they provided it to your
8 counsel and not to you directly?

9 A. Ask the question better.

10 Q. Are there individuals you're aware

11 of who have shared information with your
12 counsel but not with you that will be used as
13 evidence in court?

14 ATTORNEY SHOCHET: Again --

15 THE WITNESS: Unbelievable.

16 ATTORNEY SHOCHET: -- invading
17 the attorney/client privilege.

18 THE WITNESS: Attorney/client
19 privilege. Oh, my --

20 ATTORNEY MATZKIN: It's just a
21 yes or no question.

22 ATTORNEY SHOCHET: Honestly,
23 you can't --

24 THE WITNESS: That's --

25 THE REPORTER: One at a time.

↑

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1 ATTORNEY SHOCHET: -- you're
2 saying what I said, which is the same thing.
3 You're doing it --

4 BY ATTORNEY MATZKIN:

5 Q. Here's the question. Here's the
6 question.

7 Are you aware -- I'm not telling you

8 to name them or tell me the nature of the
9 information. I'm just asking a yes-or-no
10 question. Are there individuals that you're
11 aware of, that shared information with your
12 counsel that you intend to use at evidence in
13 court? Yes or no?

14 ATTORNEY SHOCHET: That's work
15 product. So don't answer that either.

16 THE WITNESS: Oh, my goodness.

17 ATTORNEY SHOCHET: I get to
18 decide what's -- what we use --

19 THE WITNESS: I can't believe
20 it. I literally cannot believe him.

21 BY ATTORNEY MATZKIN:

22 Q. So you're not going to tell me the
23 names of any of these moles that you've
24 referred to on YouTube as providing texts that
25 you've been shown?

↑

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1 ATTORNEY SHOCHET: Now we're
2 talking about moles? Now it's moles?

3 THE WITNESS: Would you like
4 the name of some freckles? I call this one

5 Charlie. This is Eileen.

6 ATTORNEY SHOCHET: He doesn't
7 mean moles -- define mole for him.

8 THE WITNESS: I know what he
9 means.

10 ATTORNEY SHOCHET: Okay.

11 THE WITNESS: It's just
12 ridiculous.

13 BY ATTORNEY MATZKIN:

14 Q. So -- so on your YouTube videos, you
15 have on more than one occasion shown using your
16 own cell phone held up to the camera messages
17 and chats involving Lynette Preston and the
18 person who provided that to you.

19 And I'm asking you to give me the
20 names of the individuals who provided you
21 that -- those texts and chats that you showed
22 on YouTube?

23 ATTORNEY SHOCHET: Objection.
24 Asked and answered.

25 If you want to answer it again.

↑

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1 THE WITNESS: Attorney/client

2 privilege.

3 ATTORNEY SHOCHET: No, but the
4 E-mails that you mentioned. If you want to
5 answer it again, go ahead. It's up to you.

6 THE WITNESS: I don't have any
7 information in front of me to be able to
8 answer.

9 ATTORNEY SHOCHET: Okay. Same
10 answer.

11 BY ATTORNEY MATZKIN:

12 Q. Have you ever publicly stated that
13 the goal of suing someone is not to win, but to
14 bankrupt them?

15 A. Not to my recollection.

16 Q. Did you ever sue Marilyn Raby?

17 A. No, I did not.

18 Q. If you prevail in this lawsuit, what
19 do you believe you'll be able to collect from
20 my clients?

21 ATTORNEY SHOCHET: Objection
22 to form.

23 You can answer.

24 BY ATTORNEY MATZKIN:

25 Q. To satisfy the judgement. If you

1 prevail and win a judgment against my clients
2 for a lot of money, how will you seek to
3 satisfy that? What do you believe they have to
4 satisfy such a judgement?

5 ATTORNEY SHOCHET: Again,

6 okay, if you have to rely on anything I've told
7 you about --

8 THE WITNESS: It's
9 attorney/client privilege.

10 ATTORNEY SHOCHET: But do you
11 have knowledge outside of our conversation?

12 THE WITNESS: I have no
13 knowledge outside of our conversations.

14 BY ATTORNEY MATZKIN:

15 Q. So do you believe that they have,
16 you know, cash that you can recover from them?

17 ATTORNEY SHOCHET: You can
18 answer.

19 THE WITNESS: Yes.

20 BY ATTORNEY MATZKIN:

21 Q. And what is -- what is the basis of
22 your belief that they have cash in sufficient
23 an amount to pay off a judgement you expect to

24 recover in this case?

25 A. You just asked me if I believe. You

Page 235

1 didn't ask me --

2 Q. No --

3 A. It's a belief --

4 Q. No, that's not what you're --

5 A. I belive -- I believe it --

6 ATTORNEY SHOCHET: Hold on.

7 Hold on. Whoa. Whoa. Whoa. Whoa.

8 THE WITNESS: -- I believe in

9 wind and air, too.

10 ATTORNEY SHOCHET: Objection

11 to form as to foundation.

12 You can answer. Go ahead.

13 BY ATTORNEY MATZKIN:

14 Q. So what is the basis of your belief
15 as to their source of financial assets that you
16 can seek to satisfy a judgment?

17 A. I have no basis for a belief.
18 That's why it's just a belief and not a fact.

19 Q. Do you recall in more than one
20 YouTube video listing names of witnesses that

21 you would be requiring to travel to Florida to
22 testify in this proceeding?

23 ATTORNEY SHOCHET: Same thing.

24 Work product. Objection.

25 THE WITNESS: Attorney/client



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1 privilege.

2 ATTORNEY SHOCHET: You can
3 answer.

4 BY ATTORNEY MATZKIN:

5 Q. No, it's not. I'm asking you
6 whether you recall --

7 A. Yes, it is. It's actually the
8 attorney/client privilege. It's a conversation
9 that I've had with my attorney, and therefore,
10 it's attorney/client privilege. I haven't had
11 conversations outside of it with my attorney.

12 Q. Do you recall publicly on YouTube
13 naming individuals that you would be forcing to
14 travel to Florida to give testimony in this
15 case?

16 ATTORNEY SHOCHET: You can
17 answer that.

18 THE WITNESS: I recall stating
19 that that is the goal for those testimonies and
20 depositions. But ultimately, I don't make that
21 decision. The judge is making the decision in
22 regards to the amount of depositions and the
23 time frame of those.

24 BY ATTORNEY MATZKIN:

25 Q. My question pertained to



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1 specifically whether you acknowledge naming
2 some individuals and saying on YouTube that
3 they would be forced to travel to Florida to
4 give testimony in this case?

5 ATTORNEY SHOCHET: That's work
6 product, and again, it's my decision.

7 ATTORNEY MATZKIN: It's what
8 he said on YouTube.

9 ATTORNEY SHOCHET: It doesn't
10 matter. You're -- listen -- you can have the
11 question read back. That's not what you asked.

12 ATTORNEY MATZKIN: I'll move
13 on.

14 BY ATTORNEY MATZKIN:

15 Q. What was the purpose for you to
16 broadcast Attorney Shochet's deposition --
17 video deposition of my client, Ms. Preston,
18 beginning on September 5th and over the course
19 of eight days?

20 ATTORNEY SHOCHET: I didn't
21 hear that question. You broke up. What was
22 the what?

23 BY ATTORNEY MATZKIN:

24 Q. What was the purpose, Mr. Hales, of
25 broadcasting the video deposition of my client

Page 238

1 taken by your counsel in January? What was the
2 purpose of broadcasting that over eight
3 segments on your YouTube channel from
4 September 5th to the 13?

5 A. So the first purpose would be
6 accountability and protection. The second
7 purpose would be this is my life. This is the
8 story of my life that people want to know
9 what's going on.

10 But the main emphasis of all of it
11 is protection and accountability from these

12 monsters.

13 Q. Thank you for that straight answer.

14 And so how was playing this video
15 going to serve the purpose of protection and
16 accountability given that that loss -- that
17 legal action was dismissed at the time?

18 A. That's pretty funny considering you

19 at the beginning of this are begging and

20 pleading like a child that none of these

21 depositions are played. And you had to file a

22 motion at the beginning.

23 You are the one that doesn't want

24 the accountability out there. You are the one

25 that doesn't want the safeguarding of this



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1 information. You're the one that doesn't want

2 me protected.

3 The accountability of the camera is

4 more powerful than anything else. Information

5 out to the people is more powerful than

6 anything else. Seeing the corruption. Seeing

7 the disgust. People are disgusted with you.

8 You are vile. You are bottom of the

9 barrel. You are trying to literally break the

10 law to try and get your name in the law.

11 This is disgusting. You are the one

12 at the very beginning going, "I don't want this

13 played. I don't want people to know who I am

14 really on camera. I don't want people to see

15 who I am and what I'm really about." Showing

16 them who you really are. Showing them what

17 you're really about. Showing them the reality

18 and the truth. That's protection. That's

19 accountability. That's safeguarding my life.

20 Remember, it's your clients, both of

21 them, who said they were going to shoot me in

22 the face. Both of them said they were going to

23 pop a cap in my ass. Both of them who are part

24 of some of these vile, heinous, in -- just

25 gross, sick things. Accountability.



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1 Protection. Safeguarding. Information out

2 there is my protection.

3 Q. Are you finished?

4 A. Are you finished?

5 Q. Nope. So my question is: How did

6 the broadcasting of the January deposition from
7 September 5th to 13th serve those purposes that
8 you just articulated?

9 ATTORNEY SHOCHET: Objection
10 to form. Hold on. Objection to form.

11 You can answer, if you know how it
12 served those purposes.

13 THE WITNESS: I already
14 answered it. I just answered it in the
15 question before.

16 Protection. Accountability.
17 Safeguard. Truth.

18 BY ATTORNEY MATZKIN:

19 Q. How did it protect you?

20 A. Shut up, and listen. You asked me a
21 question.

22 Exposing the truth. Exposing who
23 they really are. Exposing what they're really
24 about. Sharing so nobody else has to go
25 through this hell that we've had to go through,



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1 this torment that we've had to go through.

2 Being stalked, being extorted, being harassed,

3 being tormented. We don't want this on

4 anybody.

5 You're an evil individual. You're a

6 horrible person, and yet I still wouldn't want

7 you to be stalked and harassed and extorted by

8 these people. We have been threatened by them

9 constantly.

10 And you making a mockery of it

11 online on YouTube. Oh, boy, your PR campaign.

12 Oh, boy. Your "What the Hales anti ecosystem."

13 I wouldn't give -- as horrible as you are as an

14 individual, I don't even know how you sleep at

15 night, to be honest. I don't know how a woman

16 sleeps next to you, to be honest, and yet I

17 still wouldn't want your clients to do what

18 they've done to me to you. They are horrific

19 people.

20 It's safeguarding. It's protecting.

21 It's accountability, and it's making sure this

22 doesn't happen in our lives again.

23 Q. Are you performing for YouTube now,

24 Mr. Hales?

25 A. Are you on YouTube right now?

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1 ATTORNEY MATZKIN:

2 Mr. Shochet, are you able to control your

3 client and have him answers questions directly?

4 ATTORNEY SHOCHET:

5 Mr. Matzkin, again, do you have a question for

6 my client? He answered your question. Do you

7 have another question, or I'll start my cross?

8 BY ATTORNEY MATZKIN:

9 Q. So you -- so you say that you played

10 the video of the deposition so that it wouldn't

11 happen to anybody else. I think that was in

12 there somewhere; am I right?

13 ATTORNEY SHOCHET: You can

14 answer.

15 THE WITNESS: I -- why answer?

16 He's already asked. I mean, come on. You've

17 got so much time. Federal court only allows

18 you so much time. Get to something real.

19 BY ATTORNEY MATZKIN:

20 Q. Well, so my question is: Is how

21 would playing that deposition the way you did

22 from September 5th to 13th somehow protect

23 others from going through what you went

24 through?

25 A. Really? So they see the Court

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1 system. They see the corruption of a judge.
2 They see the corruption of Levy County. They
3 see what being stalked on YouTube is like, the
4 hell that we've had to go through. And you
5 don't think they're going to learn from that
6 process? You don't think they're going to
7 learn, "Oh, this is how to justice system
8 works? Oh, this is how it doesn't work? Oh,
9 this is how -- this is what's going on?"

10 This is how I protect myself. This
11 is the most important thing for anybody online,
12 an online personality, is security, security,
13 security, security, or this is going to happen
14 to you, as well.

15 Oh, that's right. They said that I
16 am a child rapist, that I raped their daughter.

17 How would you respond if they said that about
18 you because you're probably next on their list?

19 How are you going to respond when they put up
20 in your community? How are you going to
21 respond when they start saying that on your

22 reviews online? How are you going to respond
23 when these individuals say they're going to
24 shoot you in the face and feed you to gators?

25 This is a learning process and an

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1 educational process for anybody and everybody
2 out there. And you would think that you would

3 be smart enough -- I don't know how in the

4 world you passed the Bar -- but you would be

5 smart enough to know that that's the process in
6 the first place and to know that you just threw
7 in your hat with some people that are extremely
8 dangerous.

9 And here you are. And now you're
10 trying to protect yourself, but it ain't going
11 to work. And yet I'm protecting myself by
12 information out on the web.

13 Q. Do you recall that Judge Davis said
14 he didn't want to see this on YouTube on
15 September 4th when Ms. Preston dismissed the
16 State Court temporary restraining order against
17 you?

18 Do you recall Judge Davis saying

19 that?

20 A. Judge Davis never said that.

21 Q. And do you acknowledge that that
22 night you specially made a YouTube broadcast --
23 a YouTube video bragging about winning -- "I
24 Won in Court" being the headline?

25 A. Again, Judge Davis never said that,

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1 nor do I remember what videos I broadcast on
2 any given day. There's so many.

3 ATTORNEY MATZKIN: Would you
4 like to take a break, Alyssa?

5 THE REPORTER: No. Thank you.

6 ATTORNEY MATZKIN: I think
7 we'll go until 5:00, and so I think we should
8 probably take a break at, like, 3:40 for ten
9 minutes.

10 ATTORNEY SHOCHET: So you're
11 announcing a break 22 minutes before it? Okay.

12 BY ATTORNEY MATZKIN:

13 Q. So do you know who Olga Nelson is,
14 Mr. Hales?

15 A. Yes.

16 Q. And who is Olga Nelson?

17 A. Biological aunt of Harley Grace.

18 Q. And how do you know Olga Nelson?

19 A. I have never met her in person.

20 I've only met her through communication.

21 Q. And did you contact her, or did she
22 contact you originally?

23 A. I've never contacted anybody in
24 regards to any of this. Everybody contacts me.
25 Olga -- I don't even know if it was Olga who

↑

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1 contacted me. It might have been Jessica.

2 Q. Jessica who?

3 ATTORNEY SHOCHET: You can
4 say.

5 THE WITNESS: I don't have my
6 phone to look at contacts.

7 ATTORNEY SHOCHET: Then you
8 don't have to answer.

9 THE WITNESS: I don't know.

10 BY ATTORNEY MATZKIN:

11 Q. Is Jessica another aunt --
12 biological aunt?

13 A. Biological aunt of Harley Grace.

14 Q. And did you have a remote live
15 video, you know, guest appearance by Ms. Nelson
16 and Jessica on one of your livestreams?

17 A. Yes.

18 Q. And did you discuss during that
19 livestream a -- initiating the Court proceeding
20 to have the Preston child removed and given
21 custody to them?

22 A. Can you rephrase it in a simple,
23 easy-to-understand question instead of these
24 comments?

25 Q. During the livestream on which

↑

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1 Jessica and Olga Nelson appeared as your
2 guests, did you discuss with them initiating --
3 them initiating a court proceeding directed at
4 having Harley Grace Preston taken from the
5 custody of Lynette Preston and given to them?

6 A. We discussed an emergency court
7 proceeding based on the living conditions, the
8 extremely poor and, frankly, in my opinion,
9 abusive living conditions of Harley Grace based

10 on the actions of Lynette Preston and John Cook
11 against Harley Grace.

12 And let's see. We've got --
13 let's -- well, let's just dig into that a
14 little bit.

15 We've got Lynette claiming that John
16 Cook is an abuser, that she wants him out of
17 her life. That -- if that's happening to
18 Lynette, what do you think is happening to a
19 little child?

20 We've got Lynette stating all over
21 and in videos that John -- she doesn't trust
22 John with the child. We've got Lynette stating
23 in videos that the child is so sick --
24 life-threatening disease that she can't be
25 around anyone, and yet we've got a livestream

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1 sitting on fat Lisa Lee's lap. Isn't that
2 interesting? With no face mask.

3 Oh, we also have she's going to get
4 spanked in the mouth. We also have all the
5 witnesses of actual people seeing Lynette
6 hitting her in the head. We have -- I mean,

7 the list goes on and on. Nails. Glass.

8 "She's going to die from this. She's going to
9 die from that."

10 The extreme conditions are un- --
11 unfavorable for a child, especially one that
12 somehow, somehow has a life-threatening
13 disease.

14 Q. So why would, to your understanding,
15 the biological aunts contact you about the
16 child's living conditions and dangers that
17 she's in?

18 A. I don't know. What about Lynette
19 posting that she moved out of the trailer to
20 get away from John Cook, to get Harley Grace
21 away from John Cook?

22 You know, this is your client's own
23 posting saying about the person that she's
24 living with with this child. That's your
25 client.

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1 Oh, and there's so much more. So
2 much more. The endangerment of this child.
3 So, so much more.

4 So who do you think -- who do you
5 think when they reach out to Levy County
6 Children Services, and Levy County Children
7 Services absolutely ignore all of this? Oh, we
8 even have on video Levy County Children
9 Services coming and not even doing an
10 investigation on the property because it's too
11 hot, it's too humid, and we've got mosquitos,
12 and we show up with a sheriff, and then we
13 leave.

14 You know, at some point, people go,
15 "Where do I turn?" And them knowing that
16 Lynette has done this to so many people, that
17 Lynette continues to ruin people's lives like
18 this, but she has finally found somebody who is
19 willing to stand up to her and hold her
20 accountable.

21 Oh, I would say they probably went,
22 "You know what? We should contact him. He's
23 actually going to hold her accountable. Maybe
24 we can save this child."

25 Q. Got you. So they saw that you --

↑

1 you were the one that they saw willing to stand
2 up to Lynette Preston, and so they contacted
3 you for help about the child; correct?

4 A. Well, they definitely didn't go to
5 fat Lisa Lee and her "Save Harley Grace"
6 website. Oh. You know, the one where they
7 state that they're PR for Lynette, they're the
8 mouth piece for your client? That one. Yeah.
9 You know about that.

10 So they contacted me because they
11 care. Would you be quiet and listen to my

12 answers?

13 They contacted me because they love
14 that child. They contacted me because they
15 care about that child. They contacted me
16 because they're in fear for that child's life
17 every single day around your clients.

18 They contacted me because of the --
19 because of the verbal abuse. They contacted me
20 because of the physical abuse. They contacted
21 me -- now, these are my beliefs. I can't
22 answer the question for them why they contacted
23 me. But I bet you're going to have an
24 opportunity to be in court to ask them.

25 Q. Okay. Now --

↑

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1 A. Hold up a second. I'm not done.

2 How about we got an almost 5-year-old on Route

3 98, one of the most dangerous highways in

4 Florida, at night. And she's illegally walking

5 on the road with a child in a stroller who

6 isn't potty trained who's almost 5 years old.

7 Boy, you know what? If you're not

8 contacting Levy County Children Services,

9 there's seriously something wrong with you,

10 seriously something wrong with you, because you

11 know this situation, and yet you are quoted as

12 saying, "I don't give a fuck about the child.

13 I'm just their lawyer."

14 How dare you not care about a child?

15 Q. So the -- you had called CPS on --

16 A. You're a mandatory reporter of child

17 abuse. Did you report it?

18 Q. So you had called CPS before; right?

19 A. You're a mandatory reporter of child

20 abuse. How many times have you called CPS and

21 reported this? Because you know what's going

22 on.

23 Q. You had called CPS before you had
24 the aunts on your livestream; am I right?

25 A. How many times have you called CPS?



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1 You're a mandatory child abuse reporter. Oh,

2 that's right. You don't care. You don't care.

3 You want fame for macaroni and cheese. Oh, my

4 goodness. What a joke.

5 All right. So I called CPS one
6 time. I don't know what date. I don't recall.
7 I don't remember. One time I called CPS based
8 off of my concerns.

9 Q. Now, when they -- when Ms. Nelson --
10 Ms. Nelson and Jessica contacted you and you
11 had them on your stream and you were talking
12 about the dangerous conditions, et cetera, and
13 an emergency proceeding, did you -- excuse
14 me -- did you offer to help them with that
15 financially to pay for lawyers or a lawyer?

16 A. No. I've never given them any money
17 for lawyers.

18 Q. Did you donate a hoodie that was
19 auctioned off for something like \$15,000, and

20 that money was for them to use for this court
21 proceeding?

22 A. So we auctioned off a hoodie. It
23 never got paid for. I've never given them any
24 money for their lawyers.

25 Q. Did you ever hear of an attorney

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1 Jenny Consuegra from Miami?

2 A. Not to my knowledge.

3 Q. Were you aware of the filing by
4 Attorney Consuegra with Olga Nelson as her
5 client?

6 A. Again, not to any knowledge.

7 Q. Well --

8 A. You're asking me about a filing with
9 an attorney where I already told you "not to my
10 knowledge." How do you expect me to answer a
11 question when I've already told you I don't
12 know the attorney?

13 Q. Okay. But you, on your YouTube
14 broadcast, were regularly referring to an
15 ongoing emergency court removal proceeding to
16 save Harley Grace; right?

17 Do you acknowledge that you made
18 those statements?

19 ATTORNEY SHOCHET: Objection
20 to form. Compound question.

21 THE WITNESS: I have no
22 authority to remove anyone from anyplace. What
23 I do desire is for a child to be in a happy,
24 healthy living situation. And that is not with
25 your clients. It is evident to anyone,

↑

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1 including you, that that is not the safe
2 environment that she deserves as a child.

3 I can't remove any child. I have no
4 authority, no power to remove any child. What
5 I can do is report when I see something is
6 inappropriate. I can report when I see
7 something is wrong. When I see something, I
8 can do the responsible adult thing -- which you
9 have yet neglected to do -- and actually report
10 it -- even though you're a mandatory reporter.

11 BY ATTORNEY MATZKIN:

12 Q. So were you at all in the loop, so
13 to speak, with respect to the filing by Olga

14 Nelson using Attorney Consuegra seeking to
15 access the adoption file pertaining to Harley
16 Grace Preston?

17 A. I am not involved in any of that.

18 Q. Were you involved in helping arrange
19 a crew of people to retrieve Lloyd Campbell's
20 RV and other items from Ms. Preston's property?

21 A. No. I'm involved in helping a
22 veteran who is afraid for his life, who reached
23 out to me and asked for help.

24 Q. And did the -- did you actively
25 arrange for any of the following individuals to

↑

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1 participate in this help?

2 Martha George Rizk? No. Strike
3 that. Not Martha George Rizk.

4 A. Yeah. I would say you got to
5 strike. You obviously don't even know your
6 clients or your case. That's for sure.

7 Q. Did you specifically ask Deanna West
8 to participate in that effort?

9 A. Not to my recollection. And let's
10 be very, very, clear: It is Lloyd Campbell who

11 had all full access and legal rights to the
12 property as a tenant, who asked for us to help
13 remove his personal property as he had every
14 legal right to remove that personal property.

15 Q. So did you -- did you ask Deanna
16 West, "Hey, can you help out get Lloyd's
17 property off of Ms. Preston's property"?

18 A. I don't recall. I seriously doubt
19 it. She probably volunteered to say "I want to
20 help him" because that's the type of person she
21 is.

22 Q. Well, then how would she have known
23 that there was this need?

24 ATTORNEY SHOCHET: Objection

25 to form. Calls for speculation.

↑

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1 Answer, if you know.

2 BY ATTORNEY MATZKIN:

3 Q. So it's your testimony that you're
4 not the one who told Deanna West about this,
5 and that's what led to her helping?

6 A. No recollection of how Deanna West
7 knows about helping, and nor would I ever have

8 forced her or told her to do such a thing.

9 Q. And did you have any -- did you
10 contact Rex Woods and ask him if he would help
11 remove Lloyd Campbell's property?

12 A. No, I did not.

13 Q. And did you contact Therese Granger
14 and ask if she would help?

15 A. No, I did not.

16 Q. And did ask you contact Stephen
17 Granger and asked if he would help?

18 A. No. Stephen Granger contacted me
19 and asked if I could help, and I said, "No, I
20 can't help. I'm in Ohio."

21 Q. So Stephen Granger called you on the
22 phone, did he?

23 A. Again, I don't recall.

24 Q. But is it your testimony, though,
25 that the first time you became aware of Lloyd

↑

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1 Campbell needing to get his stuff off the
2 property was Stephen Granger calling you?

3 A. I don't recall if it was a phone
4 call or what it was. But Stephen Granger is

5 the one that made me aware that Lloyd Campbell
6 was in fear for his life and that he needed
7 help somehow, someway to remove all of his
8 property from the property he had all legal
9 access to as a tenant.

10 Q. So was that call from Stephen
11 Granger before or after you broadcasted a phone
12 call with Lloyd Campbell?

13 A. Before.

14 Q. And were you -- and were you -- did
15 you ask Travis Willis if he would be involved
16 in helping remove the property?

17 A. I don't recall if I contacted him or
18 not.

19 Q. Okay. So you don't recall
20 contacting any of the five individuals, Deanna
21 West, Therese Granger, Stephen Granger, Rex
22 Woods, Travis Willis? Your testimony is you
23 don't recall contacting any of them to ask them
24 if they would participate in helping remove
25 Lloyd Campbell's stuff?

↑

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1 A. I don't recall.

2 Q. And you don't know how any of them
3 would have known about this mission other than
4 you telling them?

5 A. Yeah, the same way I did. Lloyd
6 contacted me.

7 Q. So Lloyd contacted you out of the
8 blue?

9 A. Oh, my goodness. You literally just
10 talked about a video of a phone call with
11 Lloyd, and now you're asking me?

12 Obviously, he contacted me.

13 Q. But it was the first time you had
14 ever had communi- -- it was just a phone call,
15 "Hi, I'm Lloyd Campbell, Mr. Hales. I need
16 your help"?

17 A. The first time I've ever had any
18 type of contact with Lloyd Campbell.

19 Q. And how did he get your number? Do
20 you know?

21 ATTORNEY SHOCHET: Objection
22 to form.

23 Answer, if you know.

24 THE WITNESS: Yes, I know.
25 Stephen Granger gave it to him.

1 BY ATTORNEY MATZKIN:

2 Q. Now, you were aware, were you not,
3 that the filing for the emergency removal of
4 Harley Grace Preston was denied by the Court?

5 You learned that maybe through some
6 -- maybe Two Lee's or otherwise, but you
7 learned that; right?

8 A. No.

9 ATTORNEY SHOCHET: Objection
10 to form. Hold on.

11 Objection to form.

12 THE WITNESS: I don't know
13 about it any way.

14 BY ATTORNEY MATZKIN:

15 Q. So you're not aware -- you're not
16 aware that the Court -- the family law court
17 denied what was filed by Olga Nelson through
18 her lawyer seeking --

19 A. I literally just said I'm not aware.
20 This is the first -- now, regardless of me
21 screen recording everything that Two Lee's
22 posts, it goes straight to a lawyer team, and
23 then it's going to court.

24 So regardless of whether I have
25 every screenshot of every little thing that

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1 they've said and they've done, I don't actually
2 watch, and I don't listen. It goes to a legal
3 team, and it will be handled in court.

4 So this is the first I'm hearing
5 anything about this.

6 Q. Okay. To be clear, right now me
7 telling you is the first time you're learning
8 that that proceeding seeking to -- to take
9 Harley Grace and put her with the biological
10 aunts -- you're just now learning that that was
11 denied by the Court?

12 A. To my complete and total
13 recollection, this is the first time I've heard
14 anything about it.

15 Q. But you were regularly referring to
16 it on your YouTube broadcasts, and then when it
17 was denied, you haven't referred to it since.

18 So you're saying that's just a
19 coincidence?

20 ATTORNEY SHOCHET: Objection

21 to form. Compound question. Lack of

22 competence. Calls for speculation.

23 But outside of that, subject to my

24 objection, if he tries to raise it with the

25 magistrate, you can answer.

↑

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1 ATTORNEY MATZKIN: These are

2 all improper speaking objections.

3 BY ATTORNEY MATZKIN:

4 Q. But in any event, is it a

5 coincidence that --

6 ATTORNEY SHOCHET: No, it's

7 not.

8 BY ATTORNEY MATZKIN:

9 Q. Is it a --

10 ATTORNEY SHOCHET: He can

11 answer, subject to my objection.

12 BY ATTORNEY MATZKIN:

13 Q. Is it a coincidence that the same

14 time the Court denied that proceeding and that

15 that fact was publicly broadcast -- and you

16 then suddenly stopped talking about this

17 emergency removal proceeding -- that's not

18 because you knew that the Court had denied the
19 filing?

20 A. Absolutely not. So why don't you
21 give me -- since you're talking about time
22 frame, why don't you give me the time frame
23 when this actually happened?

24 Q. Well, I'm not going to take ten
25 minutes to go looking through records.

↑

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1 A. No? You'll take ten minutes to ask
2 this stupid question over and over and over
3 again in the form of a statement because you
4 don't literally know how to actually
5 communicate and ask a question. You'll waste
6 more than ten minutes.

7 Q. You posted a photograph last week
8 that appears to be taken from the top of a
9 vehicle so that it could be high enough to
10 capture an image above the six-foot-high
11 privacy fence; is that correct?

12 A. No, it's not correct. There's no
13 footage -- or no photo from any top of a
14 vehicle.

15 Q. Oh. Is there a photo, though, that
16 you brought -- that you showed on your YouTube
17 page -- on your YouTube channel that does show
18 over the fence into the property of
19 Ms. Preston?

20 A. You mean literally that I can see
21 everything as I drive by? Is that what you're
22 referring to?

23 Q. I'm referring to a photograph where
24 the fence is shown, and you can see over the
25 fence because of the height of the camera.

↑

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1 A. You going to show it so I can say
2 whether I recognize it or not?

3 Q. I'm not going to show it. I don't
4 have it. I'm asking --

5 A. Well, why didn't you come prepared?

6 Q. So you don't know which photo I'm
7 referring to?

8 A. There are photos upon photos upon
9 photos upon photos upon photos. So which one
10 are you referring to? Why didn't you come
11 prepared to show it?

12 Q. Have you taken any photos -- have
13 you posted any photos over the fence showing
14 inside the property -- Ms. Preston's property?

15 A. What's the difference what I can see
16 over the fence, or there was no fence, and I
17 can see all the same stuff? There is no
18 difference.

19 So let's get down to your
20 terminology. "Over the fence" means absolutely
21 nothing. When I drive by, I can see
22 everything. That fence means nothing.

23 Now, it does give me a little bit
24 more of security knowing that John Cook is
25 drunk most of the day, and there's a little

↑

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1 something more for a bullet to go through
2 instead of me or George or Deanna or some other
3 loved one.

4 But the reality is that fence does
5 absolutely nothing. I can see all the same
6 things I saw before when I drive by.

7 Q. Is it your -- is it your position
8 that -- that Ms. Preston is a public figure?

9 A. It's not my position. It's a fact.
10 Anybody who runs to the newspapers, anybody who
11 runs to the actually news channels, anybody who
12 has put hundreds and hundreds of GoFundMes to
13 exploit a child for money instead of getting a
14 job and actually being willing to take care of
15 that child, any individual who runs for public
16 office and literally fails is a public
17 individual.

18 Anybody who runs -- I don't know.
19 Last count I had 13 Facebook groups promoting
20 herself as a public individual. Promoting the
21 turtle rescue. Promoting. Promoting.
22 Promoting. Wanting to launch her YouTube
23 channel which, by the way -- and she wants to
24 complain about people posting pictures of the
25 child -- her main profile picture is the child

↑

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1 on YouTube.

2 Your client is a public person.

3 Channel 20 reporter? Oh. Let me run as fast
4 as I can out to Channel 20 and lie to Channel
5 20."

6 So your client who runs to the news
7 station. Your client who contacts newspapers.
8 Your client who runs for office. Your client
9 who literally asked a judge in Levy County,
10 "Can I run again for Town Hall?" Who has
11 already ran for Town Hall.

12 I'm going to keep going on because
13 your client is a -- your client is a public
14 figure. Soliciting public funds. Solicit- --
15 oh, wait. Wait. Hold on a second. That's
16 your client on Two Lee's In a Pod. That's your
17 clients, both John Cook --

18 Q. Okay.

19 A. -- and the pickles and the fam --

20 hey, I'm not done. Shut up, and listen.

21 That's your client who out there on
22 Miltowns Best. That's your client all over
23 YouTube. That's your client all over Facebook.
24 That's your client all over the newspaper
25 stating "What the Hales." That's your client

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1 on Channel 20. That's your client at town
2 hall. That's your client in all these public

3 records. That's your client in court who says
4 she doesn't want anything to do with this.
5 That's your client that says she doesn't want
6 to be on YouTube, and yet she's on a livestream
7 in the lap of fat Lisa Lee.

8 That's your client who wants to have
9 my channel removed under your direction in your
10 "Anti What the Hales ecosystem." Your client
11 is a public figure.

12 Q. Okay. Now, is it because of her
13 status as a public figure that you feel it's
14 okay to do so many videos focused on her and
15 her property condition and the safety of her
16 child and calling for the child to be removed?

17 Is it because of her status as a
18 public figure that you feel that it's okay for
19 you to do that?

20 A. Excuse me. What? The channel name
21 is "What the Hales." It's not "What the
22 Lynette." It's not "What the Crook." It's
23 "What the Hales."

24 This is the story of my life and how
25 they invaded my life, how they came, and they



1 actually stalked me which they've been found

2 guilty of.

3 They have broken the violations.

4 They have been found guilty of -- they will be

5 found guilty again. We will actually file

6 again on more than we talked about today.

7 It is your clients that have stalked

8 me, defamed me, tormented me, harassed me. I

9 am exercising my First Amendment rights. I'm

10 exercising -- shut up, and listen.

11 I'm exercising --

12 Q. You know what? I'm going to --

13 A. -- my right to actually safeguard

14 myself, protect myself and when Levy County

15 Sheriff and the Court system fails to make sure

16 there's some type of accountability in my life.

17 It's "What the Hales." It's not

18 "What the Lynette." It's not "What the Crook."

19 It's not "What the HG."

20 Now, there's also a child that is

21 living in despicable conditions. Pooping in a

22 bucket. Peeing in a bucket. Almost 5 -- no.

23 Now 5 years old. Can't even go to the

24 bathroom. Not even potty trained yet.

25 Should be in school, but we both



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1 know your client won't allow that to happen

2 because if they found out she's got lice and

3 she's living in lice and she can't even

4 formulate full sentences and she's so far

5 behind developmentally, that she'll be reported

6 to children services yet again.

7 There's a serious issue. A child's

8 safety is at stake. And you don't seem to

9 care. And that makes you a pathetic

10 individual. Especially, as I continue to tell

11 you, you are a mandatory reporter, and you've

12 reported nothing.

13 Q. So why are you doing --

14 A. It's my life. This is my channel

15 documenting what they've done to destroy my

16 life. You've tried to recruit others to come

17 in and destroy my life, which is all in

18 writing.

19 How stupid can a lawyer be?

20 Seriously? How stupid? You think you're going

21 to get away with this? Uh-huh. Never going to

22 happen. Never going to happen.

23 Your clients who have come in,

24 invaded my life wanting money, wanting fame,

25 wanting donations, and then you jumping on



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1 board because you want the exact same thing.

2 You recruiting others guaranteeing them,

3 telling them you're going to increase their

4 views, you're going to increase their income.

5 Q. Done?

6 ATTORNEY SHOCHET: Counsel,

7 when there's silence, it means he's finished.

8 BY ATTORNEY MATZKIN:

9 Q. So why -- why do you believe it's
10 your responsibility to become involved in the
11 child situation?

12 A. Are you that dumb? I just told you.

13 You're a mandatory reporter. It's your

14 responsibility, as well.

15 What have you done about it?

16 Q. My question was: Why do you feel
17 it's your responsibility to become involved?

18 A. When you saw the video of her on 911

19 calling Levy County Sheriff that she threatens
20 to spank the child in the mouth, did you
21 call -- did you call CPS?

22 You're a mandatory reporter. I know
23 you saw it. You know she said it. I know she
24 said it. It's all public information. Because
25 I'm --

↑

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1 Q. Then why --

2 A. -- shut up, and listen -- because I
3 am an actual responsible individual who cares
4 about children who can't defend themselves.
5 We've got a court reporter in here that just
6 told us her children were going to day care.
7 Do you think if something would happen to her
8 kids, that she wouldn't want somebody calling
9 and protecting her kids?

10 And yet here you are smirking. Yet
11 here you are smirking with that giant nose that
12 somebody already broke. Here you are smirking
13 at a camera because you've done nothing to
14 protect this child. It's your responsibility.
15 It's my responsibility, it's Randy's

16 responsibility, it's Alyssa's responsibility to
17 protect those who can't protect themselves:
18 Children, the elderly such as Lloyd Campbell
19 who feared his life from your clients. That's
20 why I feel responsibility, because there is a
21 human responsibility.

22 You know, there are some humans out
23 there that have hearts. They actually care
24 about other people. They don't try to take
25 advantage of other people. They try and better



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1 their lives.

2 And when I see things such as
3 despicable living conditions, when I see
4 backwards -- literally backwards developmental
5 in a child, when I see individuals coming
6 forward who originally, initially, actually
7 believed Lynette but now who are coming forward
8 to protect a child, it's their responsibility,
9 as well.

10 When the truth is actually shared,
11 which is what I do on What the Hales, actual
12 truth, not Two Lee's in a Pod that smell like

13 cod, not two lies that you love to hang out

14 with.

15 And yet you know what? You're

16 talking about the timeline. All of the sudden,

17 you know that you're incriminating yourself

18 within these lawsuits, and now you're absent.

19 Oh, but you're still posting, calling people,

20 you know -- let's see -- morons, idiots.

21 You're the most unprofessional

22 lawyer I've ever witnessed in my life, and

23 frankly, you're the best lawyer I've never had

24 to pay in my life because you literally

25 incriminate your clients and yourself over and



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1 over and over again.

2 It's your responsibility to protect

3 that child. It's my responsibility to protect

4 that child. And where others fail, we need to

5 step up.

6 There is -- there is all kinds of

7 harassment on Facebook from you. There's all

8 kinds of the harassments on Facebook from

9 others incited by you. There's all kinds of

10 harassment on YouTube and Facebook by your
11 clients.

12 This child should not have to live
13 this way: Isolated. You have a deputy, a
14 corporal who you're so foolish to name in a
15 lawsuit, who is literally telling Lynette, "Do
16 not lock that child in that camper."

17 That child is isolated from people.

18 That child is isolated from growth. That child
19 is isolated and being abused. It's my
20 responsibility to report it. It's your
21 responsibility to report it.

22 Q. Okay. But why did -- why was it
23 necessary for you to make numerous videos
24 focused on the child being removed --

25 A. Oh, my goodness.

↑

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1 Q. -- and this proceeding?

2 A. Oh, my goodness. What's the name of
3 the channel, Bruce? Oh, wait. I'm sorry.
4 Deuce. What's the name of the channel, deuce?
5 What is it? Is it "What the child"? What's
6 the name of the channel?

7 Q. But it's not your child.

8 A. Say it.

9 Q. Why was it --

10 A. Say it.

11 Q. -- your responsibility?

12 A. Say the name of the channel.

13 Q. It wasn't a relative of yours. Why

14 would you take it on your responsibility --

15 A. Say the name of the channel.

16 THE REPORTER: Please wait for

17 him to finish his question, Mr. Hales. Please.

18 THE WITNESS: Yes, ma'am.

19 Alyssa, I apologize that you're a part of this.

20 BY ATTORNEY MATZKIN:

21 Q. So why was -- why did you take it on
22 as your responsibility to devote your YouTube
23 content to a campaign of saving the child by
24 having her removed?

25 A. My YouTube content is my life. Your

↑

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1 clients invaded my life. They stalked me,
2 attempted to use me, and have abused my name,
3 and they have attempted to destroy my income

4 and my businesses mostly under the direction of
5 you.

6 Q. Okay. Do you --

7 A. It's "What the Hales."

8 Q. Do you think --

9 A. "What the Hales."

10 Q. Do you --

11 A. "What the Hales."

12 Q. Do you --

13 A. The channel is about my life; your

14 clients invaded my life. They stalked me.

15 They harassed me.

16 This is what's going on in my life.

17 You want it to end? Tell your clients to get

18 healthy and stop doing what they do. Why would

19 you actually represent them instead of further

20 incriminating them and yourself?

21 Q. Is this being videotaped, to your

22 knowledge? Is this deposition being

23 videotaped, to your knowledge, Mr. Hales?

24 A. Does it matter?

25 Q. I have a question. I need an

↑

1 answer. Is it being videotaped, to your
2 knowledge?

3 A. Here's the answer: This is my life.

4 Q. Just --

5 A. There is no YouTube personality.

6 There is no YouTube content. This is my life.

7 No matter if I'm in a storage unit, no matter

8 if I'm cutting down trees on my property, no

9 matter if I'm being stalked by your clients, my

10 life gets videoed and shared. My life. Not

11 yours that you have now invaded my life, as

12 well, and now you're worried that it's being

13 videoed? You're worried that -- you're worried

14 it's going to be videoed?

15 You're the one that literally has

16 posted publicly that you can't wait to depose

17 me. You fool. You are an ignorant fool. Shut

18 up, and listen when I'm answering your

19 questions.

20 ATTORNEY SHOCHET: Hold on a

21 second. Just -- I'm getting a -- in my upper

22 right corner, it says "recording." And I'm not

23 recording it, and I hope you're not, sir.

24 Well, I see a red light. It says "recording."

25 I'm going to take a screenshot of it.

↑

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1 THE REPORTER: Counsel, I can
2 explain. Counsel, I can explain. That's for
3 Steno's backup purposes if I were to lose the
4 feed. That's all it's for. It gets destroyed
5 after 14 days of the deposition being taken.

6 ATTORNEY SHOCHET: Okay. I'm
7 going to ask your company to preserve it.

8 THE REPORTER: You can make a
9 request to them.

10 ATTORNEY SHOCHET: I will do
11 that. Okay.

12 BY ATTORNEY MATZKIN:

13 Q. Okay. So now that we know that
14 Steno has a backup recording, my question to
15 Mr. Hales is: To your knowledge, is this being
16 video recorded by your arrangement?

17 A. Does it matter?

18 Q. Yes.

19 A. Why? You're the one that is online.
20 You're the one that's gloating, saying you
21 can't wait to depose me. You're the one that's
22 gloating, and you're the one that's telling Two

23 Lee's that you're going to put that all out
24 there on their channel. You're the one
25 literally stating this. What do you care --

↑

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1 Q. Are you --

2 A. -- if it's being recorded?

3 Shut up, and listen. Keep your

4 mouth shut. Gosh, for as big of a nose that

5 you have, your mouth is even bigger.

6 Listen. You're the one that's out

7 there telling everybody you can't wait to

8 depose me, and yet here you are cowering like a

9 little child. You're whining at the beginning,

10 "I don't want to record it." Now you're -- now

11 you're whining more about recordings.

12 What's wrong? Are you feeling

13 guilty? You feeling like you haven't taken up

14 your responsibilities and done the right thing

15 for your clients and for yourself? All of a

16 sudden, you got a moral compass?

17 The recording makes no difference

18 whatsoever. There is no gag order. There is

19 no court order. And there's you publicly

20 stating you can't wait to depose me. There's
21 young publicly stating that the deposition is
22 going to be online on Two Lee's. There's you
23 stating all these things.

24 Q. So the question, again, is: Other
25 than the backup recording by Steno, are you



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1 having this deposition videotaped?

2 A. Attorney/client privilege.

3 Q. No, it's not.

4 A. Yeah, it is. It's a conversation
5 with my attorney, and I'm not talking about it
6 outside of my conversation with my attorney.

7 Q. I don't want anything about your
8 conversation with your attorney. It's just a
9 yes-or-no question.

10 A. That's why I just told you,
11 attorney/client privilege.

12 Q. Is this video -- is this deposition
13 being videotaped by you through your request or
14 order or arrangement?

15 ATTORNEY SHOCHET: Counsel,
16 let me save you time. The answer is no. Okay.

17 And I am preserving the video, so it is being
18 recorded, as you now are made aware.

19 BY ATTORNEY MATZKIN:

20 Q. So, Mr. Hales, why wouldn't you just
21 tell me "no"?

22 A. Well, you being the individual that
23 publicly stated that you were so -- you
24 couldn't wait to depose me, and that you're
25 going to put the depositions online, why would

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1 it matter?

2 Q. So the answer is no --

3 ATTORNEY SHOCHET: Counsel --

4 BY ATTORNEY MATZKIN:

5 Q. -- it's not being videotaped?

6 ATTORNEY SHOCHET: -- for the

7 record, that I'm not recording it. The court

8 reporter is. Are you recording this right now?

9 This is a question that involve -- involves

10 Florida law.

11 So are you recording this right now?

12 ATTORNEY MATZKIN: There is a

13 question.

14 ATTORNEY SHOCHET: Oh, you're

15 not going to answer that? Okay.

16 BY ATTORNEY MATZKIN:

17 Q. Mr. Hales, is this deposition being
18 videotaped by you -- at your request by anybody
19 that you asked to videotape it or hired to
20 videotape it? Yes or no?

21 A. Not to my knowledge.

22 Q. All right. Do you have any videos
23 of Michelle -- of Lynette Preston or John Cook
24 stalking you? Videos.

25 A. Oh, my goodness. Oh, my goodness.

↑

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1 Q. Other than -- okay. I guess you're
2 going to tell me about the ones you've turned
3 into the police, et cetera.

4 Other than the ones we might have
5 already discussed today, do you have any videos
6 of them that you claim show them stalking you?

7 A. Let's back up. Let's back up with
8 your ignorant question.

9 First of all, they've already been
10 found guilty as such. So the argument is --

11 Q. My question was about videos.

12 Videos.

13 A. Shut up, and listen. Shut your
14 mouth.

15 Q. Okay. Okay. So we're going to end
16 right now.

17 ATTORNEY SHOCHET: You guys
18 are both interrupting each other.

19 ATTORNEY MATZKIN: The
20 deposition -- the deposition will be terminated
21 at this point.

22 Not yet, Alyssa. I've got a few
23 things to say. Thank you. Okay.

24 ATTORNEY SHOCHET: Just do a
25 quick question.

↑

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1 ATTORNEY MATZKIN: There will
2 be no more questions today. Okay? Listen to
3 me, Mr. Shochet. There will be no more
4 questions today.

5 ATTORNEY SHOCHET: Yes, there
6 will.

7 ATTORNEY MATZKIN: There is

8 not -- I --

9 ATTORNEY SHOCHET: Go ahead.

10 ATTORNEY MATZKIN: I'm

11 going -- I'm going to speak, and when I'm done

12 you can speak, okay, on the record. But I'd

13 like you to put it on mute while I speak so

14 that Mr. Hales and you don't interrupt. Okay?

15 Thank you.

16 So I'm going to end the questioning

17 for today. And what I plan to do is to procure

18 a copy of the backup video from Steno as well

19 as the transcript and the audio file, so three

20 separate formats, and I intend to file an

21 appropriate motion with the Court.

22 And I intend to ask the Court to

23 review the deposition video that will be

24 presented to him, and I will ask the Court to

25 do a number of things in the alternative.



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1 I'll ask them to dismiss the case.

2 I will ask them to impose sanctions, including

3 the cost to pay Steno for today's deposition,

4 and for my time.

5 And I will -- and I will ask them if
6 neither dismissed -- and/or whether they award
7 costs to enter appropriate orders addressing
8 the situation that has presented itself here
9 today.

10 And so I have endeavored to move on
11 through my questioning and progress down my
12 list of questions, which still has quite a long
13 way to go, and would have never been completed
14 in just today or one seven-hour deposition
15 given all the time wasted by Mr. Hales on his
16 tirades.

17 So I will, of course, be asking the
18 Court, if it's not dismissed, that I will be
19 entitled to continuing Mr. Hales' deposition as
20 necessary to get through my lines of
21 questioning in an efficient way and to my
22 satisfaction and, thereby would need an order,
23 according to the rules, to go beyond the single
24 day. So I intend to file that request.

25 I do not intend to proceed on



1 Wednesday with the deposition of Martha George

2 Rizk. I am notifying you here and now on this
3 record that I am postponing that deposition
4 indefinitely.

5 ATTORNEY SHOCHET: We need a
6 notice of cancellation, sir.

7 ATTORNEY MATZKIN: I am
8 postponing that definition -- that deposition
9 indefinitely. You will not receive a separate
10 notices. I'll send you an E-mail to confirm.
11 That is what you will get. There's
12 no formal notice of cancellation.

13 ATTORNEY SHOCHET: Tell me
14 through written communication. We're going to
15 be here.

16 ATTORNEY MATZKIN: I will
17 E-mail you confirming what I'm telling you now,
18 and if you want to come any way, then you'll do
19 it knowing that there won't be any court
20 reporter or opposing counsel. Okay?

21 ATTORNEY SHOCHET: I'll do so
22 unless you do a notice of cancellation somehow.

23 ATTORNEY MATZKIN: What else?
24 Mr. Shochet --

25 ATTORNEY SHOCHET: You say



1 you're terminating, but yet you keep talking.

2 So I'm going to --

3 ATTORNEY MATZKIN: Yes.

4 ATTORNEY SHOCHET: --

5 terminate it myself.

6 ATTORNEY MATZKIN: I don't
7 take -- I don't lightly -- I don't lightly -- I
8 don't lightly go to court about an opposing
9 counsel, but I am -- I find it --

10 ATTORNEY SHOCHET: All right.

11 ATTORNEY MATZKIN: --

12 necessary in this case.

13 ATTORNEY SHOCHET: Madam Court
14 Reporter, we are now going to leave since he's
15 terminated the deposition. And I guess we
16 won't see you Wednesday.

17 (A discussion was held off the
18 record.)

19 ATTORNEY SHOCHET: Mr. Matzkin

20 off the record briefly said that he's not

21 available on Wednesday for a deposition that

22 was scheduled on Friday. He did notice

23 Ms. Rizk's deposition for Wednesday.

24 So I'm going to ask you,

25 Mr. Matzkin, you're not -- you were available



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1 as of five seconds ago, but now you're not

2 going to be available on Wednesday.

3 You've also previously told me in an

4 E-mail that I could schedule a deposition at

5 any time. So I'd ask you to state, since

6 you're going to send this video to the Court,

7 what is your conflict for Wednesday?

8 ATTORNEY MATZKIN: You have a

9 noticed deposition for Friday, and I intend to

10 attend. And that is all I will say. Thank

11 you.

12 ATTORNEY SHOCHET: I'm going

13 to renotice it for Wednesday, and we expect you

14 to appear unless you say what your conflict is.

15 You've already told me in an E-mail I can

16 schedule a deposition at any time.

17 Now that you've given up Wednesday,

18 I'll reschedule the deposition for Friday on

19 Wednesday. Okay?

20 ATTORNEY MATZKIN: I won't be

21 appearing on Wednesday.

22 ATTORNEY SHOCHET: All right.

23 Let's go -- let's finish, go back off the

24 record. Thank you, everybody.

25 THE REPORTER: Mr. Shochet,

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1 before we go off, do you need a copy of the

2 transcript?

3 ATTORNEY SHOCHET: Well, we'll

4 read, so send me a copy. Sure.

5 - - -

6 (Thereupon, the deposition was

7 concluded at 4:01 p.m. Signature was not

8 waived.)

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1 C E R T I F I C A T E

2 - - -

3 I, JEREMY B. HALES, do hereby certify that I
4 have read the foregoing transcript and it is a
5 true and correct copy of my deposition, except
6 for the changes, if any, made by me on the
7 attached Deposition Correction Sheet.

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1 COMMONWEALTH OF PENNSYLVANIA)
) SS
2 COUNTY OF BERKS)

3 CERTIFICATE

4 I, Alyssa A. Repsik, a notary public in and
for the Commonwealth of Pennsylvania, do hereby
5 certify that the witness, JEREMY B. HALES, was
by me first duly sworn to testify the truth,
6 the whole truth, and nothing but the truth;
that the foregoing deposition was taken at the
7 time and place stated herein; and that the said
deposition was recorded stenographically by me
8 and then reduced to typewriting under my

9 direction and constitutes a true record of the
10 testimony given by said witness.

11 I further certify that I am not a relative,
12 employee, or attorney of any of the parties or
13 a relative or employee of either counsel and
14 that I am in no way interested directly or
15 indirectly in this action.

16 IN WITNESS WHEREOF, I have hereunto set my
17 hand and affixed my seal of office this 5th day
18 of December 2024.

19

20 /S/ Alyssa A. Repsik

21 Alyssa A. Repsik, Notary Public
22 Court Reporter
23 Notary Public
24 Berks County
25 My Commission Expires March 12, 2028
Commission Number 1296614