

Robert Jacobson Deposition Memo

Scarlett Lewis vs. Alex E. Jones, Infowars, LLC, And Free Speech Systems, LLC in the 53rd Judicial District, Travis County, Texas

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Robert Jacobson'S Employment At Infowars From 2004 To 2017.

Robert Jacobson Confirmed Working at Infowars Since 2004, Hired by Alex Jones, Believed to Be an Independent Proprietor

- **Former InfoWars Employee:** Robert Jacobson confirmed he used to work at InfoWars. ([22:1 - 22:2](#))
- **InfoWars 2004 Hiring:** Robert Jacobson was hired by InfoWars in 2004 by Alex Jones, who he believed was an independent proprietor at the time. ([22:3 - 22:9](#))

Robert Jacobson's Employment at Infowars Ended in May 2017 After Approximately 13 Years

- **InfoWars Employment Termination:** Robert Jacobson stated his employment at InfoWars ended on April 30th or May 1st of 2017, after approximately 13 years of service. ([22:15 - 22:21](#))

Robert Jacobson Confirms No Longer Friendly with Infowars; Was Terminated

- **Jacobson's InfoWars Termination:** Robert Jacobson stated that he is no longer on friendly terms with InfoWars and confirmed that he was terminated. ([72:13 - 72:17](#))

The Change In Journalistic Approach And Company Growth At Infowars Over Time.

Jacobson Joined Infowars Believing in Its Mission, Aimed to Do Objective, Corroborative Journalism, Despite Objections

- **Initial Belief in InfoWars Mission:** Robert Jacobson affirmed that he largely believed in InfoWars' mission when he initially joined the company. ([25:10 - 25:12](#))
- **InfoWars: Occult, Politics, Honesty:** Robert Jacobson stated that upon his arrival at InfoWars, he believed the company's focus was on topics such as the occult, esoteric politics, and undisclosed activities of politicians. He perceived it as fringe media that was off the mainstream, yet honest. ([25:13 - 25:23](#))
- **InfoWars Filmmaking Aspirations:** Robert Jacobson stated that when he first joined InfoWars, he was passionate about filmmaking and wanted to be a documentary filmmaker, which he believes falls under the broader umbrella of journalism. ([25:24 - 26:7](#))
- **Good Journalism Intent:** Robert Jacobson expressed his intention to do good journalism. ([26:8 - 26:21](#))
- **Good Journalism: Objective, Fact-based Reporting:** Robert Jacobson defined "good journalism" as objective reporting of facts, where the journalist removes personal emotions and theories, focusing on empirical evidence and minimal bias. ([26:22 - 27:4](#))
- **Journalism and Fact Corroboration:** Robert Jacobson believes that good journalism and corroboration of facts are closely related. He asserts that the more witnesses and perspectives on a reported action or activity, the better. He uses the analogy of observing a cup from different sides to illustrate the importance of multiple viewpoints in providing a comprehensive description of an event. ([27:5 - 27:17](#))

The Coverage Of The Sandy Hook Incident By Infowars And The Subsequent Harassment Of Victims' Parents.

Jacobson Confirms Company Changed by Early 2013; Instructed to Pause Before Answering Due to Objections

- **Sandy Hook Lawsuit Understanding:** Robert Jacobson confirmed his understanding that the lawsuit pertains to Sandy Hook. [\(28:17 - 28:19\)](#)
- **Company Change Confirmation and Deposition Conduct:** Robert Jacobson confirmed that the company had changed by the start of 2013. He agreed to pause before answering questions to avoid disruptions during the deposition. [\(28:20 - 29:17\)](#)

Jacobson Testifies Infowars Grew Significantly, Changed Journalistic Practices, and He Felt Complicit in Unethical Sandy Hook Coverage

- **InfoWars Growth and Expansion:** Robert Jacobson confirmed that the company had changed significantly since he started working for InfoWars. Initially, it was a small operation with around five employees, and he worked from his private office. By 2010, the company had grown to over 60 staff members, a full-size facility, and a full-blown studio. [\(29:24 - 31:1\)](#)
- **InfoWars Evolution and Fact-Checking Shift:** Robert Jacobson felt that the journalistic approach of InfoWars changed over time, with Alex Jones shifting from a combination of website, films, and radio show to focusing more on the radio show and website. Jacobson believed that the removal of films was a significant loss. He also noticed a change in the process of fact-checking, with Jones relying more on others for research towards the end of Jacobson's employment. Jacobson expressed concern about his involvement with InfoWars during the Sandy Hook incident, despite not being directly involved in the dissemination of related content. [\(31:2 - 33:5\)](#)
- **Sandy Hook Coverage Concerns:** Robert Jacobson stated that during his employment at InfoWars, he was bothered by the coverage of Sandy Hook. He explained that the accusations made were based on extremely narrow cross-sections of information, which he believed was speculative and lacked sufficient information. Jacobson also expressed his concern about the perceived lack of journalistic ethics. [\(33:6 - 33:19\)](#)
- **Ethics Concerns Dismissed by InfoWars:** Robert Jacobson attempted to communicate his concerns about the Sandy Hook coverage to the writers at InfoWars, emphasizing the violation of journalistic ethics. Despite his efforts, which included multiple visits to the writers' room, his warnings were met with laughter and jokes. [\(33:20 - 34:17\)](#)
- **Sandy Hook coverage writers:** Robert Jacobson stated that there were two writers, one primary and possibly another, involved in the Sandy Hook coverage. [\(34:18 - 35:4\)](#)
- **InfoWars Sandy Hook Exposure:** Robert Jacobson confirmed he was exposed to InfoWars' coverage of Sandy Hook. [\(35:5 - 35:9\)](#)
- **InfoWars Staff Awareness and Reckless Sandy Hook Coverage:** Robert Jacobson was aware of every staff member working at InfoWars up until May 2017. He observed actions he considered reckless in the coverage of Sandy Hook by the writers. [\(35:10 - 35:22\)](#)
- **InfoWars Employees' Reckless Sandy Hook Conduct:** Robert Jacobson stated that he believed certain individual employees at InfoWars, where he worked until May of 2017, engaged in reckless conduct regarding the Sandy Hook story. [\(35:23 - 36:4\)](#)
- **Jacobson's Opinions on Dew's Work:** Robert Jacobson developed opinions about the work of Rob Dew, an employee at InfoWars, on Sandy Hook. [\(36:5 - 36:8\)](#)

Jacobson Found Alex Jones' Comments on Sandy Hook Parents Disturbing and Defended Their Emotional Responses

- **Discomfort with On-Air Criticism of Sandy Hook Parents:** Robert Jacobson confirmed his discomfort with Alex Jones' on-air comments about the Sandy Hook parents. He expressed disturbance at the criticism of Mr. Pozner's emotional changes during a broadcast, arguing that it's normal for emotions to fluctuate after a traumatic event. Jacobson attempted to clarify this to others, expressing his disgust at the lack of understanding for the emotional turmoil experienced by those who have suffered a tragedy. ([49:14 - 51:2](#))

Robert Jacobson Describes Paul Watson As Alex's Alternate Host and Sidekick; Unaware of Watson's Views on Sandy Hook Hoax Claims

- **Paul Watson: Alex's Alternate Host and Sidekick:** Robert Jacobson identified Paul Watson as Alex's alternate host and essentially his sidekick. ([52:19 - 52:22](#))
- **Unaware of Hoax Opinions:** Robert Jacobson stated he was not aware of Paul Watson's opinions about the Sandy Hook hoax allegations. ([52:23 - 53:1](#))
- **Sandy Hook Coverage Objections at InfoWars:** Robert Jacobson stated that he independently voiced objections regarding elements of the Sandy Hook coverage at InfoWars and had discussions with others about it. ([53:2 - 53:8](#))

Jacobson Acknowledged Infowars' Awareness of Sandy Hook Controversy and Parents' Harassment, and Urged Ethical Reporting Responsibility

- **Sandy Hook Video Discussion:** Robert Jacobson did not specifically raise complaints about the video allegation related to Sandy Hook during his discussions with InfoWars. He found the point to be silly and was surprised that Alex was emphasizing it, knowing that YouTube pixels can smudge. ([61:17 - 62:3](#))
- **Delayed Awareness of Complaints:** Robert Jacobson was not immediately aware of complaints from Sandy Hook victims' parents about InfoWars' coverage. He became aware of it later through a PBS special. ([62:4 - 62:11](#))
- **InfoWars Staff Sandy Hook Awareness:** Robert Jacobson stated that the InfoWars staff was aware of the public controversy they were causing with their Sandy Hook allegations. He also mentioned that the staff was cognizant of the public opinion about their Sandy Hook coverage, and they were simultaneously aware of a dual opinion, which they found exhilarating. ([62:12 - 62:25](#))
- **Jacobson's InfoWars Non-Employment During Jones Interview:** Robert Jacobson was not employed at InfoWars when Alex Jones was interviewed by Megyn Kelly. ([63:1 - 63:4](#))
- **Sandy Hook Harassment Awareness:** Robert Jacobson became aware that parents of Sandy Hook victims were being harassed by believers in the Sandy Hook hoax conspiracy theory around 2014 or 2015, after watching a PBS documentary while still employed at InfoWars. ([63:5 - 63:14](#))
- **Sandy Hook coverage caution and ethics:** Robert Jacobson confirmed that after becoming aware of the harassment related to the Sandy Hook hoax conspiracy theory around 2014 or 2015, he formed opinions about the necessary caution in covering Sandy Hook. He stated that he emphasized to the writers at InfoWars their ethical responsibility. ([63:15 - 63:24](#))

Jacobson Testifies Infowars Didn't Appropriately Respond to Sandy Hook Criticisms; Deposition Takes a Break; Writing Room Discussed

- **InfoWars Inadequate Response to Sandy Hook Criticism:** Robert Jacobson stated that, based on his personal knowledge, InfoWars did not respond appropriately to criticisms about their Sandy Hook coverage and the harassment

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of parents by believers in the Sandy Hook hoax conspiracy theory. He also acknowledged the duration of his deposition and agreed to a short break before continuing. [\(63:25 - 65:6\)](#)

- **InfoWars Writing Room Central:** Robert Jacobson confirmed that the writing room at InfoWars was the center of the writing process until the last three years of his employment there. [\(65:7 - 65:13\)](#)

Jacobson Rated Infowars' Sandy Hook Coverage As Extremely Outrageous (ten) Despite Repeated Corrections and Awareness of Harm

- **InfoWars Sandy Hook Coverage Outrage:** Robert Jacobson rated the level of outrageousness of InfoWars' coverage of Sandy Hook as a ten. He explained this rating by stating that despite repeatedly pointing out the mistakes in the coverage, the people at InfoWars not only ignored the corrections but also laughed about the damage they were causing. [\(65:22 - 66:20\)](#)

Jacobson Acknowledges Potential Bias Claims but Insists His EEOC Complaint and Alex's Abusive Actions Are Both True

- **Bias Acknowledged, Claims Affirmed:** Robert Jacobson acknowledged that people might perceive him as biased due to his EEOC complaint against Alex and InfoWars. He argued that his complaint and the alleged abusive behavior of Alex towards him and others do not invalidate the claims about Sandy Hook. Jacobson insisted that both his experiences and the Sandy Hook incident are real and independent of each other. He emphasized that Alex's abusive behavior is well-documented and public knowledge, and his complaint against Alex does not automatically discredit the Sandy Hook claims. Despite potential perceptions of bias, Jacobson affirmed the truth of his statements. [\(73:24 - 75:9\)](#)

Jacobson Testifies Against Alex Jones, Not Seeking Compensation, but to Address Jones' Harmful Rhetoric; Deposition Procedure Disputed

- **Non-compensatory Involvement and Critique:** Robert Jacobson stated that he is not seeking compensation from Alex Jones, but is involved in the case due to Jones' behavior and the suffering he has caused to the Sandy Hook parents and himself. Jacobson criticized Jones for spreading potentially false information that mobilizes his audience into irrational thinking. He confirmed that all his answers were based on his personal knowledge. After his testimony, a dispute arose between the lawyers about the right to question Jacobson, with the plaintiff's lawyer arguing that Jacobson should not be questioned by the defendants' lawyer without his own personal counsel present. [\(75:21 - 85:10\)](#)

Jacobson'S Concerns About The Lack Of Journalistic Ethics In Sandy Hook Coverage.

Jacobson Criticizes Salazar's Irresponsible Sandy Hook Coverage and Mocks His Concerns, Questioning Halbig's Credibility

- **Jacobson knows Salazar:** Robert Jacobson confirmed knowing an employee named Adan Salazar. [\(36:18 - 36:19\)](#)
- **Salazar Working on Sandy Hook:** Robert Jacobson observed Adan Salazar working on Sandy Hook. [\(36:20 - 36:22\)](#)
- **Opinion on Salazar's Sandy Hook Work:** Robert Jacobson stated that he has an opinion on whether the work done by Adan Salazar on Sandy Hook was carried out responsibly. [\(36:23 - 37:1\)](#)
- **Ethics Warning Ignored:** Robert Jacobson stated that he had warned Adan Salazar about violating journalistic ethics by relying heavily on the testimony of one witness, Wolfgang Halbig, without further investigation. Despite

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Jacobson's warnings about the potential damage and irresponsibility of such actions, Salazar responded with a desire to print merchandise proclaiming "Halbig was right." [\(37:2 - 38:1\)](#)

- **Salazar Mocked Sandy Hook Concerns:** Robert Jacobson stated that Adan Salazar mocked his concerns about Sandy Hook coverage. He also confirmed mentioning Mr. Halbig. [\(38:2 - 38:10\)](#)
- **Halbig's Questionable Sandy Hook Coverage Critique:** Robert Jacobson stated that Wolfgang Halbig was frequently featured when Sandy Hook was covered on air. Jacobson expressed his belief that Halbig might have mental and emotional issues, and could be seeking attention. He criticized the decision to present Halbig's accusations against the parents of Sandy Hook victims without questioning his credibility first. Jacobson opined that the story should not have been made public without proper journalistic ethics, which he believes were lacking, leading to damage. [\(38:11 - 39:15\)](#)
- **Halbig Credibility Doubts:** Robert Jacobson confirmed having strong opinions about Wolfgang Halbig's credibility as a sole witness. He stated he was unaware of who Halbig's points of contact at InfoWars were, suggesting it might be those handling the Sandy Hook story. Jacobson also acknowledged familiarity with some of the claims made by Halbig. [\(39:16 - 41:5\)](#)
- **Sandy Hook Claim Confirmation:** Robert Jacobson confirmed hearing the claim that Sandy Hook school was closed before the shooting, a claim associated with Wolfgang Halbig. He also acknowledged witnessing irresponsible behavior regarding this claim at InfoWars, specifically by Robert Dew and Adan Salazar. [\(41:6 - 41:24\)](#)
- **Heard claim, watched video briefly:** Robert Jacobson stated he had heard the claim that no paramedics were allowed inside the building, but his exposure was limited to briefly watching it on a video as an audience member. [\(41:25 - 42:7\)](#)
- **Allegations of Falsely Claimed Deceased Children:** Robert Jacobson confirmed hearing allegations that there are photographs of children, who are supposedly dead according to certain claims, but are actually alive. [\(42:8 - 42:11\)](#)
- **Distasteful Allegation Handling:** Robert Jacobson stated his opinion on the allegation about photographs of supposedly dead children who are actually alive, describing it as distasteful. He mentioned that the incident happened a while ago and that he viewed the allegations set forward by Halbig and others as individual cross-sections of information that were each improperly handled. [\(42:12 - 42:23\)](#)
- **Jacobson Criticizes Halbig at InfoWars:** Robert Jacobson voiced criticism of Mr. Halbig while at InfoWars, specifically to Adan Salazar. [\(42:24 - 43:4\)](#)
- **Jacobson's Acknowledgement and Denial:** Robert Jacobson acknowledged knowing the name Leonard Pozner, a Sandy Hook parent. However, he denied ever seeing any written communications or emails from Mr. Halbig. [\(43:5 - 43:11\)](#)
- **Unaware of Halbig's Visit:** Robert Jacobson stated he was not aware of Mr. Halbig ever visiting the InfoWars location in Austin. [\(43:12 - 43:14\)](#)
- **Uncertain InfoWars Involvement:** Robert Jacobson stated he was unsure if anyone from InfoWars visited Mr. Halbig in Florida. He also claimed to be unaware of InfoWars helping to raise money for Mr. Halbig. [\(43:15 - 43:21\)](#)

Jacobson Concerned Infowars Articles on Sandy Hook Merely Echoed Halbig's Claims

- **InfoWars Sandy Hook Coverage Concerns:** Robert Jacobson expressed concern about the writing process for the coverage of Sandy Hook at InfoWars, specifically that they accepted Halbig's word as news without question. [\(65:14 - 65:21\)](#)

Jacobson'S Filing Of A Complaint With The Eeoc Against Alex Jones And Infowars For Abusive Behavior And A Racist Work Environment.

Jacobson Confirms Filing an EEOC Complaint, with No Pronouns or Ambiguities in the Question

- **EEOC Complaint Filed:** Robert Jacobson confirmed that he has filed a complaint with the EEOC. ([72:18 - 72:19](#))

Jacobson Filed an EEOC Complaint Citing Infowars' Racist, Abusive Culture and Anti-semitic Incidents

- **InfoWars Abuse and Racism Complaint:** Robert Jacobson confirmed that he filed a complaint with the Equal Opportunity Employment Commission due to Alex Jones' abusive behavior, unethical and racist conduct of his staff, and a generally abusive and racist environment at InfoWars. He provided evidence of anti-Semitic actions, such as his face being Photoshopped onto a Rabbi's image and being referred to as the resident Jew. Jacobson also mentioned a culture of abuse, primarily propagated by Alex Jones. He further stated that he knew of several others who had lodged similar complaints against Alex Jones and InfoWars. ([72:20 - 73:23](#))

The Ethical And Responsible Reporting By Media Outlets And Potential Defamation.

Jacobson Finds the Crisis Actor Allegations at Sandy Hook Shocking and Criticizes the Accusers' Lack of Research

- **Shock at Crisis Actor Allegations:** Robert Jacobson expressed shock at the allegations of crisis actors being used at Sandy Hook due to the lack of research and evidence. He emphasized that such a serious claim should only be made if there is sufficient evidence, comparable to what would be required in court. ([52:2 - 52:18](#))

The Potential Harassment And Additional Suffering Caused To The Sandy Hook Victims' Families Due To The Coverage.

Jacobson Testifies Bidondi Was Emotional, Belief-driven, Unsuitable for Sensitive Reporting, and Prone to Conspiracy Theories

- **Bidondi's InfoWars Tenure:** Robert Jacobson stated that Mr. Bidondi served as an on-air reporter and journalist for InfoWars for approximately a year. ([44:4 - 44:8](#))
- **Uncertainty about Bidondi's Coverage:** Robert Jacobson is uncertain if Dan Bidondi, a former InfoWars reporter, ever covered the Sandy Hook event in Newtown. However, he confirms having met Bidondi. ([44:9 - 44:13](#))
- **Bidondi's Unprofessionalism and Bias:** Robert Jacobson stated he would not choose Dan Bidondi to treat the Sandy Hook story with respect and sensitivity due to his emotional and belief-based approach. Jacobson described Bidondi as more of a character than a journalist, prone to bias and over-emotionality, particularly in conspiracy scenarios. He noted that Bidondi's work at InfoWars often involved the occult and conspiracy theories, and his unprofessional behavior during the Boston bombing coverage made him a celebrity at InfoWars. Jacobson explained that Bidondi's accusation during the Boston bombing incident, rather than asking a question, led to his ejection from the building and subsequent celebration at InfoWars. ([44:14 - 46:13](#))
- **InfoWars Agitation Tactics Critique:** Robert Jacobson stated that public agitation was beneficial for a career at InfoWars. He cited several instances where staff members engaged in agitation rather than reporting, to the point of public disruption. Jacobson also expressed his criticism of this practice. ([46:14 - 47:4](#))

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- **InfoWars Agitation at Book Signing:** Robert Jacobson stated that Millie Weaver, an InfoWars staff member, attended a Hillary Clinton book signing event wearing Trump gear and asked abrasive questions. Jacobson considered this behavior as agitation, not journalism, and an example of InfoWars swapping the terms "agitation" and "journalism". [\(47:5 - 48:6\)](#)
- **InfoWars Non-Involvement:** Robert Jacobson stated that he was never involved in planning to elicit negative emotional reactions from interview subjects at InfoWars. He mentioned not working closely with Millie Weaver or Owen Schroeder, but suggested that Schroeder, by wearing Trump hats at political events, should understand the difference between a journalist and an agitator. Jacobson clarified that he was never part of discussions to incite fights, but believed that wearing politically charged gear at events was an obvious way to affect people's emotions. [\(48:7 - 49:8\)](#)
- **No Negative Feelings Expressed Internally:** Robert Jacobson stated that he did not hear anyone within the organization express negative feelings about the Sandy Hook parents, except for what Alex said live on the air. [\(49:9 - 49:13\)](#)

Jacobson Acknowledges Hearing "crisis Actors" at Infowars, Implying Staged Events for Policy Change; Admits Linking It to Sandy Hook

- **InfoWars "Crisis Actors" Mention:** Robert Jacobson confirmed hearing the term "crisis actors" while working at InfoWars. [\(51:3 - 51:5\)](#)
- **Crisis Actors Misconception:** Robert Jacobson understands the term "crisis actors" as individuals, possibly from Special Forces or a similar group, who are funded by special interest money to stage fake events, such as faking their own deaths, with the aim of influencing policy changes. [\(51:6 - 51:15\)](#)
- **InfoWars "Crisis Actors" Mention:** Robert Jacobson confirmed hearing the term "crisis actors" associated with the Sandy Hook event while at InfoWars. [\(51:16 - 51:20\)](#)
- **InfoWars Crisis Actors Allegation Doubt:** Robert Jacobson did not believe he would ever see evidence at InfoWars sufficient to responsibly make the allegation of "crisis actors" being attached to the Sandy Hook event on air. [\(51:21 - 52:1\)](#)

Potential Economic Damages Related To The Eeoc Complaint And The Lawsuit'S Outcome Affecting Compensation.

Jacobson Fears EEOC Ruling May Risk His Future Compensation

- **Sandy Hook Verdict Impact on Compensation:** Robert Jacobson stated that if the Sandy Hook parents are awarded a significant amount of money from Alex Jones, it could potentially jeopardize his own compensation if the EEOC rules in his favor. [\(75:14 - 75:20\)](#)

The Dispute Over Jacobson'S Ability To Testify Without A Subpoena.

Dispute Over Right to Question Witness Without Subpoena; Deposition Suspended Amid Confidentiality Concerns

- **Subpoena Inquiry and Confidentiality Reminder:** Robert Jacobson was questioned about a subpoena and a non-disclosure and confidentiality agreement. He was asked if he had been served with a deposition subpoena, but the conversation was interrupted before he could answer. Jacobson was also informed about his obligations under the

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non-disclosure and confidentiality agreement he signed. A dispute arose about whether Jacobson could testify without a subpoena and whether he had been informed about his confidentiality obligations. [\(4:16 - 21:18\)](#)

The Clarification Of Jacobson'S Obligations Under The Confidentiality Agreement.

Jacobson Lacked a Confidentiality Agreement Initially, Received One Later Under Implied Duress

- **Delayed Confidentiality Ultimatum:** Robert Jacobson stated he did not have a confidentiality agreement during his first six years of employment at InfoWars. He mentioned that the concept of confidentiality was introduced around 2010 but was not given to him until years later, under the guise of an ultimatum that threatened his livelihood. [\(22:22 - 23:5\)](#)

Jacobson Acknowledges Confidentiality Obligations but Argues Exposing Internal Abuse Doesn't Breach His NDA

- **Confidentiality and Exposure Intent:** Robert Jacobson confirmed understanding his obligations under a confidentiality non-disclosure agreement with Alex Jones or Free Speech Systems, LLC, and stated he has abided by them. He clarified his interpretation of the agreement as not covering abusive behavior or misbehavior within the company, which he does not consider company secrets. Jacobson expressed his intention to expose such behavior, specifically involving Mr. Jones and his staff, without violating the agreement by revealing actual company secrets or production methods. [\(23:17 - 24:16\)](#)

Jacobson'S Belief In The Importance Of Ethical Journalism And His Criticism Of Infowars' Departure From Such Standards.

Jacobson Questioned on Comfort with Infowars' Journalism Style; Enoch Objects, Clarifies Objection Protocol

- **Early Comfort, Later Clarity Request:** Robert Jacobson initially expressed comfort with the style of journalism and the stories he worked on during his early years at InfoWars. However, he requested for the question to be repeated for clarity. [\(27:18 - 28:8\)](#)

Jacobson Believes Ethical Journalism Is Good; Feels Guilty About Infowars' Sandy Hook Coverage

- **Alternative Media's Ethical Impact:** Robert Jacobson believes that alternative media can be a force for good if it adheres to ethical and professional journalistic standards. However, he warns that if these standards are ignored, it can lead to confusion and conflict. He emphasizes the importance of maintaining a professional standard in journalism, including independent journalism. [\(70:22 - 71:15\)](#)
- **Uncertain on Journalism Professionalism at Sandy Hook:** Robert Jacobson stated that he does not have a comment or a certain opinion on whether professionalism in journalism went right or wrong in regards to Sandy Hook, as he is unsure. [\(71:16 - 72:1\)](#)
- **InfoWars Worker's Guilt over Sandy Hook Coverage:** Robert Jacobson expressed a significant amount of guilt for not acting faster in relation to the Sandy Hook coverage that was produced by InfoWars, where he worked. He suggested that he could have quit or caught the story faster, or been more effective in his explanations. [\(72:2 - 72:12\)](#)

Jacobson'S Acknowledgment Of The Public Controversy And Awareness Within Infowars Staff About Their Sandy Hook Coverage.

Jacobson Discussed Sandy Hook Coverage Concerns with Multiple Infowars Coworkers

- **InfoWars Staff Sandy Hook Doubts:** Robert Jacobson confirmed having private conversations with his coworkers at InfoWars, specifically Ashley Beckford, Adan Salazar, Kit Daniels, and others he couldn't recall, about their reservations regarding the Sandy Hook coverage. ([53:9 - 53:20](#))

The Impact Of The Lawsuit On Jacobson'S Potential Compensation From His Eeoc Complaint.

Robert Jacobson States He Wouldn't Benefit from Sandy Hook Parents' Potential Winnings from Alex Jones

- **No benefit from InfoWars verdict:** Robert Jacobson stated that he would not benefit in any way if the Sandy Hook parents were awarded money from Alex Jones and the office of InfoWars. ([75:10 - 75:13](#))

Miscellaneous Other Section

Robert Jacobson Introduces Himself During a Deposition

- **Jacobson Introduction:** Robert Jacobson introduced himself. ([4:13 - 4:15](#))

Robert Jacobson Confirmed His Identity During a Deposition

- **Identity Confirmation:** Robert Jacobson confirmed his identity for the record. ([21:19 - 21:25](#))

Jacobson Confirms His Former Employer Claims He Worked for Free Speech Systems, LLC

- **Former Employer Claim:** Robert Jacobson stated that his former employer claims he worked for Free Speech Systems, LLC. ([22:10 - 22:14](#))

Exhibit 1 Taken by Enoch; Exhibit 2 Marked Despite Objection

- **Exhibit 2 Presentation:** Robert Jacobson was shown an item marked as Exhibit 2. ([23:6 - 23:12](#))

Robert Jacobson Acknowledges Prior Familiarity with Exhibit 2

- **Exhibit 2 Confirmation:** Robert Jacobson confirmed seeing what was marked as Exhibit 2. ([23:13 - 23:16](#))

Jacobson Acknowledges Seeing a Court Order About His Deposition but Is Uncertain

- **Uncertainty on Deposition Order:** Robert Jacobson was uncertain about a Travis County judge issuing an order concerning his deposition. ([24:17 - 24:22](#))
- **Court Order Recollection:** Robert Jacobson recalls seeing a court order concerning his deposition. ([24:23 - 24:25](#))

Robert Jacobson Felt Obligated to Testify, Regardless of a Court Order

- **Uncertain but Willing Deposition Appearance:** Robert Jacobson expressed uncertainty about his comfort appearing for the deposition without a court order, but felt it was the right thing to do regardless. ([25:1 - 25:9](#))

Jacobson Was Comfortable Producing Films at Infowars, Finding Them Interesting and Sufficiently Supported by Expert Testimony

- **Comfortable and Credible Film Production:** Robert Jacobson stated he was comfortable with the films he was producing and assisting Alex in producing during his initial years at InfoWars. He found the films interesting and believed that Alex presented sufficient expert testimony to make them credible. [\(28:9 - 28:16\)](#)

Jacobson Acknowledges Overlapping Dialogue with Bankston Can Hinder the Court Reporter

- **Acknowledged Clarity for Court Reporter:** Robert Jacobson acknowledged the need to avoid talking over each other to ensure clarity for the court reporter. [\(29:18 - 29:23\)](#)

Jacobson Criticizes Dew's Excessive Eagerness to Validate Sandy Hook Conspiracy Theories

- **Dew's Eagerness for Conspiracy:** Robert Jacobson stated that Mr. Dew was overly eager to accept any suggestion that the Sandy Hook incident might have been a staged act, celebrating any hint or whisper of such a possibility. [\(36:9 - 36:17\)](#)

Jacobson Unaware of Halbig's Harassment Towards Sandy Hook Individuals

- **Jacobson: Unaware of Halbig Harassment:** Robert Jacobson stated he has never heard of Halbig engaging in harassing behavior towards people involved in Sandy Hook. [\(43:22 - 44:1\)](#)

Jacobson Confirms Knowing Dan Bidondi; Transcript Lacks Prior Mentions, No Need for Parentheses or Answer to Final Question

- **Jacobson: Bidondi Unreferenced:** Robert Jacobson acknowledged knowing who Dan Bidondi is. He also stated that there were no references to Dan Bidondi in the transcript, and thus, no need to add any. [\(44:2 - 44:3\)](#)

Robert Jacobson Confirms "Kit Daniels" Is Only Mentioned in the Final Question As a Writer at Infowars

- **Kit Daniels InfoWars Writer Identification:** Robert Jacobson identified Kit Daniels as a writer at InfoWars. [\(53:21 - 53:22\)](#)

Jacobson Unsure About Daniels' Involvement in Sandy Hook Coverage

- **Uncertainty about Kit Daniels' involvement:** Robert Jacobson stated he was unsure if Kit Daniels, a writer at InfoWars, was ever involved in the Sandy Hook coverage. [\(53:23 - 53:25\)](#)

Jacobson Acknowledges Awareness of Alleged Blue Screen Interview with Anderson Cooper

- **Blue Screen Interview Familiarity:** Robert Jacobson confirmed his familiarity with an allegation concerning an alleged blue screen video interview with Anderson Cooper. [\(54:1 - 54:4\)](#)

Robert Jacobson Confirmed Working in Video Technology at Infowars

- **InfoWars Video Technology Employee:** Robert Jacobson worked in video technology at InfoWars. [\(54:5 - 54:7\)](#)

Jacobson Details His Audio-visual Experience in NYC and Austin, Including a 13-year Tenure Producing Documentaries for Alex Jones

- **Career in Audio Production and Documentaries:** Robert Jacobson began his career in New York City, working for several audio recording studios, including The Hit Factory. He then moved to Austin, Texas, where he worked for a music studio, followed by a three-and-a-half-year stint at the Austin Music Network. Jacobson

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subsequently worked for Alex Jones for 13 years, during which he produced approximately ten feature-length documentaries. [\(54:8 - 54:22\)](#)

Robert Jacobson Explains Blue Screen Compositing As Adding Backgrounds Behind a Subject

- **Blue Screen Compositing Explanation:** Robert Jacobson explained that blue screen compositing is a process where one can stand in front of a blue screen and add any desired background behind them. [\(54:23 - 55:2\)](#)

Jacobson Testifies Video Not Clearly Blue Screen; Doubts It's Green Screen Without Further Context

- **Video Clip Exhibit 3 Viewing:** Robert Jacobson was shown a video clip, marked as Exhibit 3, during his deposition. [\(55:3 - 55:11\)](#)
- **InfoWars Video Clip Review:** Robert Jacobson agreed to watch a video clip from an InfoWars episode, which was presented as Exhibit 3 in the deposition, and answer questions about it. [\(55:12 - 55:18\)](#)
- **Video Clip Blue Screen Ambiguity:** Robert Jacobson, with his extensive experience in video technology, stated that the video clip from an InfoWars episode was not clearly a blue screen. He further expressed that anyone with competent video experience would not immediately identify it as a blue screen. However, he also mentioned that such individuals might have serious doubts and questions about it being a blue screen. [\(55:19 - 56:15\)](#)
- **Video Error Unclear Origin:** Robert Jacobson stated that there was nothing in the video (Exhibit 3) that clearly indicated to him that it was a blue screen event. He disagreed with the assertion that anyone claiming to see telltale signs of a blue screen in the video was acting responsibly. Jacobson suggested that the error seen in the video could have been caused by a variety of reasons, including a natural glitch that often occurs on YouTube, where pixels smudge. He emphasized that without knowing what happened behind the scenes, it was not clear what caused the error. [\(56:16 - 57:21\)](#)
- **Green Screen Indicators in InfoWars Episode:** Robert Jacobson stated that the only way the video from an InfoWars episode could possibly be a green screen is if Anderson Cooper was not standing next to the woman in the video. He explained that if Cooper's nose was cut off in the video, it would suggest that he stepped out of the green screen bounds, implying that he and the woman were in different locations. Jacobson further clarified that if this were the case, the woman would not actually be looking at Cooper during the interview. He suggested that the interaction between the two would require a super-human level of responsiveness, as they would not be in the same place at the same time. [\(57:22 - 60:6\)](#)
- **Green Screen Reflection in Glasses:** Robert Jacobson stated that the reflection of a green screen background in a person's glasses during filming can sometimes be visible, depending on the lighting conditions and the person's proximity to the screen. He confirmed that if lights are shined on the green screen, it might be possible to see green in some glasses. He also clarified that a background added to a green screen does not show up live on the screen, but is only visible in the computer. [\(60:7 - 61:10\)](#)
- **Green screen reflection denial:** Robert Jacobson stated that the projected image from a computer of a town hall, or similar, would not appear in the glasses of a person being filmed against a green screen. [\(61:11 - 61:16\)](#)

Jacobson Has Known Mr. Jones Since 2004 When Employed by Him

- **Known Since 2004 Employment:** Robert Jacobson has known Mr. Jones since his employment in 2004. [\(66:21 - 66:24\)](#)

Jacobson Believes Jones Is Rational, Citing Successful Business Growth As Evidence, Despite Objections to Testimony Form

- **Alex Jones: Capable of Rational Actions:** Robert Jacobson stated that in his 15 years of knowing Alex Jones, he believes Jones is capable of rational actions. He cited the growth of Jones' business as evidence, noting that Jones

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made conscious decisions to run the business and was successful in expanding it from a small team to its current size. Despite objections to his opinions, Jacobson affirmed that Jones is rational in his decisions. [\(66:25 - 67:17\)](#)

- **Jacobson's Assessment of Jones' Morality:** Robert Jacobson confirmed that he has an opinion on whether Alex Jones can understand right from wrong, based on his years of conversation and employment with Jones since 2004. [\(67:18 - 67:23\)](#)

Jacobson Believes Jones Understands and Articulates Morality, Implying Conscious Awareness of Right and Wrong. Objection Raised for Nonresponsiveness

- **Alex Jones's Moral Awareness:** Robert Jacobson stated that Alex Jones, his former employer, is capable of distinguishing right from wrong. Jacobson based this on Jones's frequent discussions of morality on air, which he believes demonstrate conscious decision-making and awareness. [\(67:24 - 68:12\)](#)

Robert Jacobson Has Experience in Compositing Live Shots Onto Backgrounds and Has Produced Such Videos

- **Compositing Expertise:** Robert Jacobson has experience in compositing live shots onto backgrounds, having been asked to do it and produced such videos. [\(68:13 - 68:19\)](#)

Robert Jacobson Did Graphics for Infowars Films, Has Expertise in Video Technology, and Over 17 Years of Experience

- **Graphics and Video Editing for InfoWars Films:** Robert Jacobson stated that he primarily performed graphics work, in addition to video editing, for the films he made for InfoWars, doing more graphics than video compositing. [\(68:20 - 68:25\)](#)
- **InfoWars Green Screen Use Confirmation:** Robert Jacobson confirmed that InfoWars performed green screen or blue green compositing at their facility during his tenure. [\(69:1 - 69:4\)](#)
- **Video Technology Expertise Affirmation:** Robert Jacobson confirmed that video technology remains his profession today and affirmed his understanding of what video technology is. [\(69:5 - 69:15\)](#)
- **Video Technology Product Creation:** Robert Jacobson stated that his work in video technology involves using technology designed for video to create a product for his clients. [\(69:16 - 69:20\)](#)
- **Video Technology Expertise Acknowledgment:** Robert Jacobson confirmed that he considers himself to have specialized knowledge or skill in the field of video technology. [\(69:21 - 70:1\)](#)
- **Experienced Video and Media Tech Expertise:** Robert Jacobson stated he has 17 years of experience in video technology and over 20 years in media technology. He confirmed understanding the difference between a layman and a technical person. [\(70:2 - 70:14\)](#)

Robert Jacobson Considers Himself to Have Technical Expertise in Video Production

- **Video Production Expertise:** Robert Jacobson considers himself as someone who has technical expertise in video production and video technology. [\(70:15 - 70:21\)](#)

Transcript

Citation	Question / Answer
4:13 - 4:15	Q Good afternoon, Mr. Jacobson. Can you introduce yourself for our record? A I am Robert Jacobson. Summary
4:16 - 21:18	Q Okay. MR. ENOCH: Mark, I'd like to ask a couple of questions and make a comment real quickly.

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	<p>MR. BANKSTON: I don't think you've been given any orders from the Court to do any discovery. So, no, Mr. Enoch, you're not asking this witness any questions. MR. ENOCH: Mr. Jacobson -- MR. BANKSTON: Mr. Enoch -- MR. ENOCH: -- were you served with a subpoena? MR. BANKSTON: Mr. Enoch, please point me to the order in which you've been allowed to do any discovery or take any questions of any witness. Point me to it, Mr. Enoch. MR. ENOCH: Please do not -- MR. BANKSTON: Right now, point me to it. MR. ENOCH: Please do not interrupt. MR. BANKSTON: Then you're going to -- Mr. Enoch, stop talking to the witness. MR. ENOCH: Mr. Jacobson -- MR. BANKSTON: Mr. Enoch, this deposition will be suspended; and I will seek sanctions if you speak one more time to this witness. MR. ENOCH: Mr. Jacobson, have you been served with a deposition subpoena? MR. BANKSTON: Mr. Enoch, we're going off the record. We're done. The deposition's done. MR. ENOCH: We are not going off the record. MR. BANKSTON: The deposition is suspended. MR. ENOCH: We are not going off the record. MR. BANKSTON: You have no ability to take any testimony, Mr. Enoch. None. Zero. MR. ENOCH: Mr. Bankston, I suggest instead of getting emotional about it, if you'd let me ask this question -- MR. BANKSTON: No, we're not going to allow you any questions, Mr. Enoch. MR. ENOCH: Please don't interrupt me again. MR. BANKSTON: Mr. Enoch, you have no right to ask your questions. Before you ask that question -- a single question to that witness again, direct me to what authority you think you have to -- MR. ENOCH: Did you serve a subpoena on this witness? MR. BANKSTON: I don't -- I served a Notice of Deposition on this witness. MR. ENOCH: Sir, if you didn't serve a subpoena, he's under an NDA and a confidentiality agreement. He is not excused from that. You did not provide him with an order from this Court. He cannot testify today. You should have served him with a subpoena, and you did not. MR. BANKSTON: Do you want to take this up with the judge -- MR. ENOCH: No, sir. MR. BANKSTON: -- or are you going to let him testify today? MR. ENOCH: That's what I want to talk with this witness about. MR. BANKSTON: You're not going to talk to him about it. MR. ENOCH: Well -- MR. BANKSTON: You don't have the ability to do discovery. I'm going to ask this witness questions. If you -- MR. ENOCH: Mr. Bankston -- MR. BANKSTON: If you instruct him not to answer and try to prevent this deposition from happening, I will take it up to the Court. MR. ENOCH: Mr. Bankston, you are the one preventing me from asking any questions. MR. BANKSTON: I am. MR. ENOCH: Then do what you need to do, sir. MR. BANKSTON: That's what we're gonna do. MR. ENOCH: I'm going to make sure this witness knows of his obligations under the non-disclosure agreement and confidentiality agreement that he signed. Are you going to -- MR. BANKSTON: You sent him a letter telling him what his confidentiality agreements are, telling him to observe them. You have already had these communications with this witness. You have no reason to ask this witness any questions today. The Court has not granted your client any discovery whatsoever, and you will stop interfering with this deposition. You have no reason to be asking this client about confidentiality when you have already informed him of his obligations. MR. ENOCH: Mr. Bankston, I'm going to ask the question; and if you instruct him not to answer -- MR. BANKSTON: I don't represent this witness. MR. ENOCH: Mr. Jacobson, did you receive</p> <p>Summary</p>
21:19 - 21:25	<p>Q (BY MR. BANKSTON) Mr. Jacobson, I'm really sorry about all that. A Yes, sir. Q I believe the only -- I'm not sure if we got this question out. Did you introduce yourself for the record? A Yes, sir. I am Robert Jacobson.</p> <p>Summary</p>
22:1 - 22:2	<p>Q Okay. Did you used to work at InfoWars? A Yes, sir.</p> <p>Summary</p>
22:3 - 22:9	<p>Q When were you hired by InfoWars? A I was hired in 2004 by Alex Jones. Q Do you know what corporate entity you were hired by? A At the time I felt I was hired by Alex Jones, and he was an independent proprietor. MR. ENOCH: Objection, nonresponsive.</p>

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	Summary
22:10 - 22:14	Q (BY MR. BANKSTON) Do you know today what entity your former employer claims you worked for? A Yes. Q What entity is that? A Free Speech Systems, LLC. Summary
22:15 - 22:21	Q Okay. When did your employment end? A My employment ended on May 1st of 2017 -- or April 30th. Q So am I right that that's over a decade that you were at InfoWars? A I was there for around 13 years, approximately. Summary
22:22 - 23:5	Q As an employee, did you have a confidentiality agreement of any kind? A Not for the first six years or so. Q Okay. So does that mean around 2010 or so the idea of confidentiality came up? A Confidentiality was passed around the office but was never given to me until years after; and it was more of a -- you know, sort of an ultimatum, sort of suggested, putting my livelihood at risk. Summary
23:6 - 23:12	Q Apparently -- I wanted to show you something I wanted to mark as Exhibit 1, but I believe Mr. Enoch has already highjacked that exhibit. So I am going to mark this as Exhibit 2. MR. ENOCH: Object to the sidebar. Move to strike. (Exhibit 2 marked.) Summary
23:13 - 23:16	Q (BY MR. BANKSTON) Mr. Jacobson, I've handed you what's been marked as Exhibit 2. Have you ever seen a copy of that before, or do you remember seeing that? A Yes. Summary
23:17 - 24:16	Q I want to direct you to the second page. I'm going to read the paragraph that appears on this page 2. "You are reminded that you have important continuing obligations under your confidentiality non-disclosure agreements with my client. You are expected to strictly observe those duties and obligations." Do you feel like you understand what obligations are being referred to here? A I do. Q Have you abided by those obligations? A Yes, sir. In fact, may I add something? My understanding of the non-disclosure is not to reveal any company secrets. I don't think abuse or abusive behavior inside the company constitutes company secrets. I don't think misbehavior inside the company by an adult who runs the business constitutes company secrets. In fact, I'm here to try to bring light to the truth of abusive behavior inside the walls of InfoWars; and I don't think anything I say today violates the NDA, which would be constituting of company secrets, their formulas in how they produce the news. Nothing like that is going to be revealed today. What will be revealed is abusive behavior and the behavior of Mr. Jones and his staff. MR. ENOCH: Objection, nonresponsive. Summary
24:17 - 24:22	Q (BY MR. BANKSTON) Did you understand that there was a judge here in Travis County who issued an order concerning this deposition today going forward? A No -- not sure, actually. Q Okay. A Fuzzy. Summary
24:23 - 24:25	Q Sitting here today, do you recall seeing a court order concerning your deposition? A Yes. Summary
25:1 - 25:9	Q Okay. Did you feel comfortable appearing for deposition without a court order? MR. ENOCH: Objection to form. Assumes facts not in evidence. Leading. You can go ahead and answer subject to those objections.

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	<p>A Again, I'm not sure of that. I mean, with or without a court order, I just feel it's the right thing to do.</p> <p>Summary</p>
25:10 - 25:12	<p>Q (BY MR. BANKSTON) When you first joined InfoWars, did you believe in its mission?</p> <p>A For the most part, yes.</p> <p>Summary</p>
25:13 - 25:23	<p>Q Tell me about the kinds of stories or things that you wanted to be working on when you first came to InfoWars.</p> <p>A When I first -- MR. ENOCH: Objection, form. A When I first arrived at InfoWars, my understanding of InfoWars and Alex's subject matter was the occult, esoteric politics, let's say, what's going on behind the curtain, things that politicians don't tell us in exposé, in that fashion. Fringe media, off the mainstream, but still honest was my impression.</p> <p>Summary</p>
25:24 - 26:7	<p>Q (BY MR. BANKSTON) Were you passionate about journalism at that time? MR. ENOCH: Objection to form.</p> <p>A I was passionate about filmmaking, and I wanted to be a documentary filmmaker. So in that aspect, yes, that does, I believe, fall under a broader umbrella of journalism. So when it comes to documentary films, I was on board. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
26:8 - 26:21	<p>Q (BY MR. BANKSTON) Did you want to do good journalism?</p> <p>A I did. MR. ENOCH: Objection, form. MR. BANKSTON: What's the form? MR. ENOCH: Well, under the Rules, I'm not sure it's -- I think you're leading the witness; and I think -- I'm not sure if I'm supposed to say objection, leading or form. I think I'm supposed to say both. So that's my objection. You're leading the witness. MR. BANKSTON: Okay. Can you scroll up to my last question? (Reporter complies.)</p> <p>Summary</p>
26:22 - 27:4	<p>Q (BY MR. BANKSTON) Mr. Jacobson, what does good journalism mean to you?</p> <p>A Good journalism means an objective reporting of facts. Somebody who can -- or if the journalist can remove his emotion and theory as much as possible from reporting what he sees or she sees with their own eyes and ears, empirical evidence reported to the public with very little bias.</p> <p>Summary</p>
27:5 - 27:17	<p>Q In your mind, what is the relationship between good journalism and corroboration of facts?</p> <p>A I think good journalism, if you're going to have a corroboration of facts, I believe the more witnesses and points of view of the same action or activity that is being reported on, the better. And, for example, just theoretically thinking, one person can't see both sides of the cup at once. So when two people are observing it at the same time, you get a better description of the object in question. And so the more witnesses that have viewed it, the more impressions we can get after the fact of what has actually happened with the object that we're observing.</p> <p>Summary</p>
27:18 - 28:8	<p>Q In your first few years at InfoWars were you comfortable with the style of journalism and the stories you were working on? MR. ENOCH: Objection, form and leading. Anytime I make an objection like that, sir, you can go ahead and answer. THE WITNESS: Okay. MR. ENOCH: Let me say one thing. I may ask you not to answer based on a privilege. That's your choice. That's my client trying to protect a privilege; but when I object, say "Objection, form or leading," you can go ahead and answer. THE WITNESS: Okay.</p> <p>Q (BY MR. BANKSTON) Would you like me to ask that question again?</p> <p>A Yes, please.</p> <p>Summary</p>
28:9 - 28:16	<p>Q In those first few years at InfoWars, were you comfortable with the style of journalism and the stories you were working on? MR. ENOCH: Same objections.</p> <p>A I was comfortable with the films I was producing and helping Alex produce. I found them interesting; and I found that Alex did present enough expert testimony that it held water, in my mind.</p> <p>Summary</p>

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28:17 - 28:19	<p>Q (BY MR. BANKSTON) All right, Mr. Jacobson. You understand this lawsuit has to do with Sandy Hook?</p> <p>A Yes, sir.</p> <p>Summary</p>
28:20 - 29:17	<p>Q I want to direct your attention then to that event, which is end of 2012, very beginning of 2013.</p> <p>A Okay.</p> <p>Q For that time period, the start of 2013, by that time, had the company changed, in your mind?</p> <p>A Absolutely. MR. ENOCH: Objection, form. Leading. A Absolutely.</p> <p>Q (BY MR. BANKSTON) Okay. Mr. Jacobson, I have a feeling that Mr. Enoch is going to object to just about every question I ask.</p> <p>A Okay.</p> <p>Q So what I would like you to do to accommodate this, because otherwise it's going to be super-disruptive on the deposition, take a couple-of-second pause before you answer my questions because he's going to step on your answers. Okay?</p> <p>A Okay.</p> <p>Q If you can, just take a second pause. And what I'm going to do is ask you that question again because it got kind of disrupted, and I think Mr. Enoch's going to object again.</p> <p>A Okay.</p> <p>Summary</p>
29:18 - 29:23	<p>Q And just for reminders, we may in typical conversations tend to try to finish each other sentences or talk over each other, not to interrupt each other, but to help us get to the point faster. It makes it very difficult on her.</p> <p>A Right.</p> <p>Summary</p>
29:24 - 31:1	<p>Q She has trouble writing down when two people are speaking at the same time. So this is why, if you can, if you can take a pause -- you might even want to check and look over to your former employer's counsel to see if there is going to be an objection -- that way we can keep the record clear.</p> <p>A (Witness nods head.)</p> <p>Q At the start of 2013, around that time period, in your mind, had the company changed? MR. ENOCH: Objection to form, leading.</p> <p>A Yes.</p> <p>Q (BY MR. BANKSTON) Tell me about that.</p> <p>A When I first started working for InfoWars, it was an operation with just a handful of employees as far as I know, possibly five or less; maybe a few more than I'm aware of. But I was working out of my own private office. Alex had a tiny office in the far south of Austin. He had one employee that I knew of, Ryan Schlickeisen; another employee who I'm not sure of her name. I can't really recall. But she was a woman who tended his warehouse, which was in the far south side of Austin. And I'm not even sure where Alex was broadcasting out of. In 2010 he had a full-size facility. He had, as far as I know, over 60 people on his staff, if not more; and he had a full-blown studio. So it wasn't just different. It was dramatically different in every way, shape, and form.</p> <p>Summary</p>
31:2 - 33:5	<p>Q One of the aspects I want to direct your attention to is whether you, in your mind, felt that anything had changed in the company with regards to how it performed journalism.</p> <p>A I do.</p> <p>Q What are your thoughts about that?</p> <p>A I -- MR. ENOCH: Objection, form and -- yeah, objection, form. Excuse me. Go ahead. A I feel that Alex's formula definitely changed. He changed his formula from a complement of the website and films to no films anymore and more or less the radio -- the website, radio show, and films was the original form. He took the film part out, which I felt -- I felt the films were part of his kind of thing; and he went more radio show. And that's it -- website, as far as I know. So in that form of media, I kind of just felt like he just ditched an important part of his media. That's all. THE VIDEOGRAPHER: Would you mind clipping it just a little bit higher? Thank you.</p> <p>Q (BY MR. BANKSTON) Mr. Jacobson, in terms of InfoWars' consistency or process for</p>

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	<p>corroborating facts, in your mind, had that changed between the start of your employment and the end of your employment? MR. ENOCH: Objection to form and -- object to form.</p> <p>A I feel that from the beginning, when I first started working there, the fact collection was mostly Alex and -- mostly himself was the researcher. By the end, Alex let a lot of others do research for him; and I don't know if these people were specifically qualified or experienced enough to do that kind of work.</p> <p>Q (BY MR. BANKSTON) A few months back do you remember calling me about this case?</p> <p>A Yes, sir.</p> <p>Q Why'd you do that?</p> <p>A I was concerned. I wanted to make sure -- I felt I was part of something, just being in that building, when all this was going down. I felt terrible what happened, even though I, myself, know I wasn't directly involved in, you know, putting this out there directly, just being in the building, I feel complicit. I feel I have to right a wrong that I was involved in. Even though I was part of that wrong, I want to at least stack a couple of correct decisions up with some of the mistakes that I have made in the past.</p> <p>Q When you say that you weren't directly involved in putting this out there, what is "this"?</p> <p>A "This" would be Sandy Hook. Anything that InfoWars put out concerning Sandy Hook, I had absolutely no involvement in.</p> <p>Summary</p>
33:6 - 33:19	<p>Q During your employment, were you exposed to InfoWars' coverage of Sandy Hook?</p> <p>A During my employment, I had other assignments to do; and I wouldn't much pay attention to the show. However, when I did and I heard about Sandy Hook, it actually bothered me.</p> <p>Q Tell me what you mean by that. What did you hear that bothered you?</p> <p>A I heard them making accusations based on extremely narrow cross-sections of information, that I did my best to make the writers and the staff aware that what they were doing was speculation based on not enough information. It bothered me. That bothered me that I felt they had no concept of journalist ethics.</p> <p>Summary</p>
33:20 - 34:17	<p>Q Did you tell anyone at InfoWars your feelings about the Sandy Hook coverage?</p> <p>A I attempted to make it as clear as possible to the writers that there is something called journalist ethics and how what they were doing was in a direct violation of that anytime I caught wind of the Sandy Hook story on InfoWars. Now, mind you, I would like to add that it's not something I was thinking about all the time, considering I had other things to do. I'd be working on other projects. But when it would come on the screen, I would make it my business to go in to the writers and explain to them as clearly as possible that there is journalist ethics; and I tried to demonstrate what those ethics are and why they are violating them and what the damage could possibly be. In fact, I remember -- I must have been in that room four to five times, at least, and only to be received with laughter and jokes. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say "the room," is there a specific room you're talking about?</p> <p>A The room I'm talking about is the room in which the writers worked.</p> <p>Summary</p>
34:18 - 35:4	<p>Q About how many writers are we talking about involved in working on Sandy Hook? MR. ENOCH: Objection to form.</p> <p>A I believe that there were two -- one primary writer and perhaps one other that were definitely involved in Sandy Hook. MR. BANKSTON: Just so I can possibly clear up that objection, what is the objection to how many writers worked on Sandy Hook? MR. ENOCH: You haven't established he has personal knowledge, sir. MR. BANKSTON: Okay.</p> <p>Summary</p>
35:5 - 35:9	<p>Q (BY MR. BANKSTON) Just to help clear up this issue -- and I believe this has been asked if; so you have to answer it again, I'm sorry -- but you were exposed to InfoWars' coverage of Sandy Hook?</p> <p>A Yes.</p> <p>Summary</p>
35:10 - 35:22	<p>Q You would know how many people are working on Sandy Hook -- MR. ENOCH: Objection --</p>

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	<p>Q -- inside InfoWars? MR. ENOCH: Objection to form and leading. A I'm aware of every staff member that worked at InfoWars as of up to May of 2017. Q (BY MR. BANKSTON) When it came to coverage of Sandy Hook and the work that was being done by the writers, did you see things that you would consider reckless? A Yes. Summary</p>
35:23 - 36:4	<p>Q Can you tell me, are there any individual employees that you believed engaged in reckless conduct regarding Sandy Hook? A Yes. MR. ENOCH: Objection to form and leading. A Yes, I do. Summary</p>
36:5 - 36:8	<p>Q (BY MR. BANKSTON) Okay. Tell me who the employees are that you developed opinions about their work on Sandy Hook. A First and foremost would be Rob Dew. Summary</p>
36:9 - 36:17	<p>Q Okay. Let's start with Mr. Dew. What is your observations about Mr. Dew's journalistic integrity as it respects Sandy Hook allegations? MR. ENOCH: Objection to form. A I feel that Mr. Dew was overzealous to receive any type of hint that perhaps this might have been a phony act, a staged act. Any type of whisper that came through to him, he would celebrate. MR. ENOCH: Objection, nonresponsive. Summary</p>
36:18 - 36:19	<p>Q (BY MR. BANKSTON) Do you know Adan Salazar? A Yes, sir. Summary</p>
36:20 - 36:22	<p>Q Have you seen or did you ever observe any work being done by Adan Salazar on Sandy Hook? A Yes. Summary</p>
36:23 - 37:1	<p>Q Do you have an opinion as to whether that work was done responsibly by Mr. Salazar? MR. ENOCH: Objection to form. A I do have an opinion of that. Summary</p>
37:2 - 38:1	<p>Q (BY MR. BANKSTON) Can you tell me what facts and observations you may have seen that would inform that opinion of Mr. Salazar? MR. ENOCH: Objection to form. A Like I've stated already, whenever the subject came up, I would immediately clarify to the writers that there is a journalistic ethics that they're violating; and what I've pointed out to Adan specifically is that you're taking the word of one witness primarily and a couple of speculative other facts and calling it the truth without actually going down and investigating it ourselves or actually going with our own reporters and corroborating what these people are saying. I made it aware to Adan that Wolfgang Halbig could have a lot of issues that we're not considering, that by taking the word of this one man so heavily with such a great accusation that he's accusing people of is so irresponsible, so damaging. I asked him to consider the size of the audience. And Adan Salazar responded with -- and I'm going to quote him because he said it to me many times -- "I want to print up a T-shirt that says, 'Halbig was right.' I want bumper stickers that say, 'Halbig was right,'" to a laughing room. MR. ENOCH: Objection, nonresponsive. Summary</p>
38:2 - 38:10	<p>Q (BY MR. BANKSTON) Do you feel that Mr. Salazar ever mocked your concerns about Sandy Hook coverage? A Absolutely. MR. ENOCH: Objection to form. A Absolutely. Q (BY MR. BANKSTON) Let's talk about -- you mentioned the name Mr. Halbig, correct? A Yes, sir. Summary</p>
38:11 - 39:15	<p>Q Can you briefly describe who Mr. Wolfgang Halbig is? A As far as I can recall, whenever Sandy Hook was on the air or Alex or whoever was hosting was covering Sandy Hook, it was always accompanied by Mr. Halbig. And when I took a look at Mr.</p>

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	<p>Halbig and considering he was the one and only person and the claims -- or as far as I know, he was the one and only person because whenever I would tune in, he was always on. So based on that impression, I would say he was the one and only person. And every time I saw him, I saw somebody that if he was amongst a group, a large group of people, okay; but a one and only person, I felt that this person may have mental problems. This person may have a lot of emotional problems. He could be a lonely man. He could be somebody looking for attention. There could be a lot of questions to be asked before we present forward as a news organization such a heavy accusation as accusing the parents of slaughtered children of being liars. I think that perhaps we should have asked the question "what is Wolfgang Halbig's story" before we put this story to the public. This story should never have been put forward to the public at all without -- and if they knew ethics in journalism, they would have known that immediately; but they have absolutely no ethics experience, in my opinion. Therefore, the story went forward; and the damage was caused. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
39:16 - 41:5	<p>Q (BY MR. BANKSTON) Mr. Jacobson, I think it's fair to say you have strong opinions about Mr. Halbig?</p> <p>A I do. I have strong opinions about his validity as a sole witness.</p> <p>Q Okay. MR. ENOCH: Objection to form -- same objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Who is Halbig's points of contact at InfoWars? Who did he talk to? MR. ENOCH: Object to form.</p> <p>A I don't know. As far as I know, it's the people handling who were handling the Sandy Hook story. MR. ENOCH: Objection, nonresponsive. MR. BANKSTON: What's the form to asking him who Halbig's point of contact is? MR. ENOCH: Speculation, sir. Mr. Bankston, when I -- when you ask me a question, the Rules require that I respond to you clearly. I did so. MR. BANKSTON: You did. MR. ENOCH: No reason to chuckle, sir. MR. BANKSTON: It's funny, Mr. Enoch. I'm sorry if the things that happen in this deposition are funny. MR. ENOCH: I think it's unprofessional, sir. MR. BANKSTON: I think it's unprofessional for a witness to talk about having information from CIA kill teams about Las Vegas, and that's why I chuckle at it. I think it's unprofessional for you to make constant objections even when they have no legal basis. That's why occasionally, yes, you will see the corners of my mouth turn and smile. I'm obviously asking about his personal knowledge. That's what I'm asking him about. So that is why I smile.</p> <p>Q (BY MR. BANKSTON) Are you familiar with the types of claims made by Mr. Halbig?</p> <p>A Some of them.</p> <p>Summary</p>
41:6 - 41:24	<p>Q I want to ask you about some claims and if you know what they are. Have you ever heard the claim from Mr. Halbig or repeated from Mr. Halbig by somebody else that the school was actually closed before the shooting? MR. ENOCH: Objection to form.</p> <p>A I have heard, yes.</p> <p>Q (BY MR. BANKSTON) Did you see anything in your time at InfoWars that would make you think that people were acting irresponsibly as it concerns that particular claim? MR. ENOCH: Objection to form. You may answer.</p> <p>A Yes.</p> <p>Q (BY MR. BANKSTON) What kinds of things did you see -- excuse me. Scratch that. Who did you see acting irresponsibly with respect to that claim? MR. ENOCH: Objection to form.</p> <p>A Mr. Robert Dew and Mr. Adan Salazar.</p> <p>Summary</p>
41:25 - 42:7	<p>Q (BY MR. BANKSTON) Are you familiar with the claim that no paramedics were allowed inside of the building?</p> <p>A I mean, I've heard it.</p> <p>Q Okay. It's not something you had direct exposure to?</p> <p>A No, outside of me just briefly watching it on a video as if I was audience.</p> <p>Summary</p>
42:8 - 42:11	<p>Q Have you ever heard the allegation that there are photographs of children who are supposedly dead who are actually alive?</p>

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	<p>A Yes, I've heard that allegation. Summary</p>
42:12 - 42:23	<p>Q Do you -- from what you have seen inside of InfoWars, have you seen anything that has caused you to form an opinion about that allegation? MR. ENOCH: Objection to form. A I mean, you know, my opinion is it's so distasteful -- and it happened a while ago, that -- you know, it happened a while ago. So it was just all these things seem to -- all of the little allegations that Halbig and all these other people set forward, I sort of see it as individual cross-sections of information that each one was improperly handled. MR. ENOCH: Objection, nonresponsive. Summary</p>
42:24 - 43:4	<p>Q (BY MR. BANKSTON) Did you ever voice any criticism of Mr. Halbig specifically while you were at InfoWars? A Yes, I did. Q Who did you voice that criticism to? A Adan Salazar. Summary</p>
43:5 - 43:11	<p>Q Are you familiar with the Sandy Hook parent Leonard Pozner? Have you heard that name? A I have heard the name. Q Okay. Have you ever seen written communications, like e-mails, from Mr. Halbig? Have you seen what his e-mails look like? A No, I haven't. Summary</p>
43:12 - 43:14	<p>Q Okay. Do you know if Mr. Halbig ever came to InfoWars? Did he ever come to the Austin location? A I'm not aware of that. Summary</p>
43:15 - 43:21	<p>Q Okay. Do you happen to know whether anybody ever from InfoWars went to visit Mr. Halbig in Florida? A Again, I'm not sure. Q Okay. Do you know anything about InfoWars helping raise money for Mr. Halbig? MR. ENOCH: Objection to form. A I'm unaware of anything like that. Summary</p>
43:22 - 44:1	<p>Q (BY MR. BANKSTON) Okay. Are you aware of Mr. Halbig ever engaging in any sort of harassing behavior towards people involved in Sandy Hook? A I've never heard of Halbig himself engaging in that kind of behavior. Summary</p>
44:2 - 44:3	<p>Q Okay. Do you know who Dan Bidondi is? A Yes, sir. Summary</p>
44:4 - 44:8	<p>Q Can you describe what Mr. Bidondi has ever done for InfoWars? A Mr. Bidondi worked for InfoWars briefly, for about a year or so; and he served as an on-air reporter and journalist. Summary</p>
44:9 - 44:13	<p>Q Okay. Are you aware if Mr. Bidondi ever went to Newtown to cover Sandy Hook? A I'm not sure. I don't know. Q Have you ever met Mr. Bidondi? A Yes, sir. Summary</p>
44:14 - 46:13	<p>Q Okay. If you were going to pick someone to treat this story with respect and sensitivity, would you pick Mr. Bidondi? A No, sir. MR. ENOCH: Objection to form and leading. A No, I wouldn't. Q (BY MR. BANKSTON) Can you explain why not? MR. ENOCH: Same objections. A Because Mr. Bidondi is very emotional and when -- and he's also very belief based and I always</p>

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	<p>viewed him as more of somebody who could be a character than more of a journalist. And to send somebody like that with such a serious accusation to cover that, especially to talk and conversate with Mr. Halbig, knowing Bidondi, how impassioned he gets over these things and how impressionable he is with these kinds of scenarios, especially with conspiracy kinds of situations -- Mr. Bidondi gloms onto conspiracy kind of situations; he really magnates towards them -- no, I wouldn't because he would, I think, bias the situation and not fairly report it and be over-emotional. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say that Mr. Bidondi tends to glom onto conspiracy scenarios, can you tell me what you mean by that? MR. ENOCH: Objection to form.</p> <p>A I mean that he really -- you know, a lot of his programming when he was working at InfoWars had to do with the occult and all this stuff; but a lot of it also has to do with, for example, a big claim to fame for Dan Bidondi would be the Boston -- his appearance as a reporter for the Boston bombing. He made a national spectacle of himself and in an unprofessional way, which, of course, made him a celebrity at InfoWars. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say that him making a spectacle made him a celebrity at InfoWars, can you tell me what you mean by that? MR. ENOCH: Objection to form, leading.</p> <p>A He basically accused -- instead of asking a question at the Boston bombing situation, he made an accusation in which case he was escorted out of the building in typical, you know, journalist activist style, which has been popularized by InfoWars; and because he did that, he was much celebrated by the people at InfoWars. And for a moment there, you know, he was on the top of his game, I suppose, inside that office. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
46:14 - 47:4	<p>Q (BY MR. BANKSTON) When you were at InfoWars, in general, if a person did something in public that was agitating, was that good for their career at InfoWars or bad for their career at InfoWars?</p> <p>A It was -- MR. ENOCH: Objection to form. A It was excellent for their career. I can point to several examples where it's not reporting at all; it's pure agitation by many members of the staff. And I have also been very critical of that. It's been pure -- in fact, some of it is so agitating it's almost to the level of public disruption, so -- including -- can I go on?</p> <p>Q (BY MR. BANKSTON) Please. MR. ENOCH: Objection, nonresponsive so far.</p> <p>Summary</p>
47:5 - 48:6	<p>Q (BY MR. BANKSTON) Let me ask you another question. Can you give me an example of some of the things you're talking about when you say "agitation"?</p> <p>A Yes. Ms. Millie Weaver last year or the year before that -- I'm not sure when; but it was in the last, perhaps, twelve months, I believe, because it was after I left -- she showed up at a Hillary Clinton book signing event that was at BookPeople. These people were not there to protest. These people were not there to...Hillary. This was far after the election. Nobody was campaigning. But Ms. Millie Weaver decided to show up with a lot of Trump gear, which obviously is going to be -- as we follow the news, we know it's agitating towards -- in a very political way, you know. And so, in my opinion, just by looking at that, I noticed that reporters don't show up sponsoring politicians. So for her to go there and say -- and, in fact, the name of this video on YouTube is called Journalists Harassed or something. She identifies herself as a journalist while she shows up wearing political gear directly aiming at the opposite end of the spectrum, asking abrasive questions about Hillary Clinton. Now, that's not journalism. That's agitation; and that is a clear-cut case example of them swapping out the words "agitation" for "journalism" and vice versa. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
48:7 - 49:8	<p>Q (BY MR. BANKSTON) Have you ever seen anyone at InfoWars engaged in conduct that you believed was designed to elicit a negative emotional reaction from the subject being interviewed? MR. ENOCH: Objection to form and leading.</p> <p>A I've never been involved in, let's say, people planning such things. However, I've never worked with Millie Weaver closely or Owen Schroeder closely. These guys show up -- both of them show up -- Owen, I don't find to be -- I think he's very -- in my opinion, he's a very smart guy. So he must know what he's doing by showing up at these political events wearing Trump hats and whatnot. He</p>

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	<p>must know the difference between a journalist and an agitator, how a journalist has to appear neutral in his stance and how an agitator appears politically motivated on one side or the another at the moment, present in the spot. So I don't know about Millie, but I do know that Owen Schroeder should definitely know the difference. So that being said, I mean, I've never been involved in, let's say, let's go down there and cause a fight kind of discussion; but I do know that they should know better, showing up at these places with these kinds of -- you know, this kind of gear that will affect people's emotions is pretty obvious. MR. ENOCH: Object, nonresponsive.</p> <p>Summary</p>
49:9 - 49:13	<p>Q (BY MR. BANKSTON) While you were at InfoWars, did you ever hear anybody inside the organization express negative feelings about the Sandy Hook parents? MR. ENOCH: Objection to form.</p> <p>A No, except for what Alex said live on the air.</p> <p>Summary</p>
49:14 - 51:2	<p>Q (BY MR. BANKSTON) Were you uncomfortable with the things that Mr. Jones said on the air? A Yes, I was. MR. ENOCH: Objection to form and leading. I'm sorry. Would you just hesitate, please, before you give your answer? THE WITNESS: Yes, sir. MR. ENOCH: Thank you.</p> <p>Q (BY MR. BANKSTON) Specifically as it regards to comments about the Sandy Hook parents, were you ever disturbed by anything you saw at the set on InfoWars? MR. ENOCH: Objection to form.</p> <p>A I was disturbed by the way they said Mr. Pozner changed; he went from a laughing stance to a serious stance when the camera was on him briefly before he was asked to call. I wanted to -- you know, again, this is another thing I attempted to clarify with Mr. Salazar and others that when you go through an extreme tragedy, your emotions are all over the place. And this is a known fact. Just because somebody laughs at a joke somebody tries to -- you know, you're not immune to humor even if you went through a massive tragedy. For a brief moment somebody could say something; and it's, "Oh, ha, ha." You know, you don't have any really control over if somebody makes you laugh. You don't have that control. And I tried -- just because somebody went through a massive tragedy doesn't mean that you have to jump on the guy for smiling right before the camera was on him. In fact, a lot of people who experience this level -- well, I don't know about this level -- but tragedy in their life, they don't begin to even mourn until days after. They go through shock. So I was disgusted and I did attempt to clarify to everybody that people go through a range of emotions after a traumatic event. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
51:3 - 51:5	<p>Q (BY MR. BANKSTON) Have you ever while working at InfoWars heard the term "crisis actors"? A Yes.</p> <p>Summary</p>
51:6 - 51:15	<p>Q What do you understand that term to mean? A I believe it means that there are people from Special Forces, let's -- per se, or something like that. They are people from a nefarious group run through the government or outside for special -- special interest money, let's say, who will then attempt to cause a phony event to -- like, for example, crisis actors faking their death or things like that to change a shift in policy or things like that. That's what I understand a crisis actor to be.</p> <p>Summary</p>
51:16 - 51:20	<p>Q Have you ever heard while at InfoWars the term crisis actors or a similar allegation being attached to the Sandy Hook event? MR. ENOCH: Objection to form.</p> <p>A Yes, I have.</p> <p>Summary</p>
51:21 - 52:1	<p>Q (BY MR. BANKSTON) While you were at InfoWars did you feel that you would ever see evidence which you would consider sufficient to responsibly make that allegation on the air? MR. ENOCH: Objection to form.</p> <p>A No.</p> <p>Summary</p>
52:2 - 52:18	<p>Q (BY MR. BANKSTON) What is your personal feeling, sitting here today, about an allegation that</p>

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	<p>there were crisis actors in use at Sandy Hook? MR. ENOCH: Objection to form.</p> <p>A I mean, my opinion is -- my personal feeling is it was shocking to hear -- well, it wasn't shocking that they went down that line because they went down that line of thought before; but the weight of the accusation in this particular case, it was shocking that they didn't do more research. They didn't go further into it. They didn't -- I mean, what I constantly tried to clarify is a story of this level should not be brought forward unless they are -- I tried to make it clear that they need as much evidence in this story as if they were going to court to prove their case; and if they didn't have that, they didn't have a story. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
52:19 - 52:22	<p>Q (BY MR. BANKSTON) Can you tell us who Paul Watson is?</p> <p>A Paul Watson is sort of Alex's alternate host. He's basically like Alex's sidekick.</p> <p>Summary</p>
52:23 - 53:1	<p>Q Okay. Have you ever been aware of Mr. Watson's opinions about the Sandy Hook hoax allegations?</p> <p>A No.</p> <p>Summary</p>
53:2 - 53:8	<p>Q Do you know of anyone else at InfoWars who ever voiced an objection regarding any element of the Sandy Hook coverage or the coverage as a whole?</p> <p>A I don't know if -- I mean, I did it independently on my own; and then I would have talk to others about it. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
53:9 - 53:20	<p>Q (BY MR. BANKSTON) Have you ever had any private conversations with any of your coworkers at InfoWars about negative reservations about the Sandy Hook coverage? MR. ENOCH: Objection to form.</p> <p>A Yes.</p> <p>Q (BY MR. BANKSTON) And what coworkers would that be?</p> <p>A I spoke with Ashley Beckford. I spoke with... I spoke with Adan Salazar. I spoke with Kit Daniels. I spoke with... I must have spoken -- and others I don't recall. I have spoken quite a bit.</p> <p>Summary</p>
53:21 - 53:22	<p>Q Can you tell us: Who is Kit Daniels?</p> <p>A Kit Daniels is a writer at InfoWars.</p> <p>Summary</p>
53:23 - 53:25	<p>Q Was Kit Daniels ever involved in any of the Sandy Hook coverage?</p> <p>A I'm unsure.</p> <p>Summary</p>
54:1 - 54:4	<p>Q Okay. Are you familiar with an allegation concerning an alleged blue screen video interview with Anderson Cooper?</p> <p>A I am.</p> <p>Summary</p>
54:5 - 54:7	<p>Q When you were at InfoWars, did you ever work in video technology?</p> <p>A Yes, I did.</p> <p>Summary</p>
54:8 - 54:22	<p>Q Okay. Can you explain to us kind of your background and your training and experience in video technology?</p> <p>A My background began in New York City. I was working for several audio recording studios, including The Hit Factory in New York City, which is a legendary studio. I moved to Austin shortly after that. I worked for the Austin Music Network -- before that I worked for a music studio here, in Austin, Texas. I then worked for the Austin Music Network for about three and a half years, where I got even better. Then I moved from there and I worked for Alex for 13 years producing roughly ten of his feature-length documentaries. MR. ENOCH: Objection to form -- objection, nonresponsive.</p> <p>Summary</p>
54:23 - 55:2	<p>Q (BY MR. BANKSTON) Can you explain to us: What is blue screen compositing?</p> <p>A Blue screen compositing is when you can stand in front of a blue screen and you can add any</p>

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	<p>background you'd like behind you, so.</p> <p>Summary</p>
55:3 - 55:11	<p>Q Okay. Mr. Jacobson, I am going to play you a video clip that is going to be Exhibit 2 to this deposition. MR. ENOCH: I think it's Exhibit 3. MR. BANKSTON: Oh, it will be, yeah. Change that number. (Exhibit 3 marked.) MR. BANKSTON: Let me ask that question again, Mr. Jacobson.</p> <p>Summary</p>
55:12 - 55:18	<p>Q (BY MR. BANKSTON) Mr. Jacobson, I'm going to show you a video clip that is going to be Exhibit 3 to this deposition. That is a video clip from a part of an InfoWars episode. So I'd like you to watch it, and I'm going to ask you some questions about it. Okay?</p> <p>A Okay. (Video playing.)</p> <p>Summary</p>
55:19 - 56:15	<p>Q (BY MR. BANKSTON) First, Mr. Jacobson, based on your training and experience in video technology, was what we just saw clearly blue screen?</p> <p>A It was -- MR. ENOCH: Objection to form. A It was not clearly blue screen.</p> <p>Q (BY MR. BANKSTON) Okay. Would anybody with competent video experience think this was blue screen? MR. ENOCH: Objection to form.</p> <p>A Not at first view.</p> <p>Q (BY MR. BANKSTON) Would anybody with competent video experience have serious doubts about saying this was blue screen? MR. ENOCH: Objection to form.</p> <p>A I feel they would. They would be on the fence. If they saw this video, they would have questions.</p> <p>Q (BY MR. BANKSTON) Okay.</p> <p>A Can I go further and explain that?</p> <p>Q Actually, let me ask you a question on that. Okay?</p> <p>A Okay.</p> <p>Summary</p>
56:16 - 57:21	<p>Q Your opinion about whether or not it could be fairly asserted that this is clearly blue screen, in forming your opinion on whether that could be asserted, can you tell me about any of the things you see in this video or any of your experience that would inform that opinion?</p> <p>A There's nothing -- MR. ENOCH: Objection -- I'm sorry. Objection to form. Please continue. A There's nothing in that video that will clearly indicate to me that that was a blue screen event.</p> <p>Q (BY MR. BANKSTON) Okay. And so if a witness -- if anyone was to say, "I can look at that video. I work with blue screen. It's got all the telltale signs. That's clearly blue screen," in your opinion, is that person acting responsibly? MR. ENOCH: Objection to form.</p> <p>A No, I don't. I think that, based on what we see on that screen, that could be -- that error in the nose would have been caused by a number of different reasons; and none of them are clear from what we see there without knowing what happened behind the scenes with the operating room controllers, so on and so forth. That could have been a natural glitch that happens all the time on YouTube. We see it all the time where pixels smudge. There is no secret about that. There must be a million videos or more where pixels smudge all the time. In order for that -- should I continue?</p> <p>Summary</p>
57:22 - 60:6	<p>Q If you do have more facts that you are basing your opinion on.</p> <p>A The only thing I can tell you about that is the only way that that is possibly green screen is if Anderson Cooper is not standing next to that woman. MR. ENOCH: Objection, nonresponsive to the entire answer, including after the continuation of the question "if you have more facts."</p> <p>Q (BY MR. BANKSTON) When you say, "That means Anderson Cooper wasn't standing next to that woman," are you making an opinion about whether the woman in the video was actually on location? MR. ENOCH: Objection to form, leading.</p> <p>A I'm not making opinion on anything. What I'm saying is: If his nose was cutting off, that means he stepped out of the green screen or the blue screen bounds; and his nose was cut off, which would suggest she was somewhere else. He was standing in one room, she's standing somewhere else. That's what it would mean. If he stepped outside the -- and she's not outside the green screen bounds, how could he have stepped outside the green screen bounds if she is -- she would be disappeared. She wouldn't even be on the screen. We would see -- if that was green screen, we would see -- she would</p>

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	<p>either -- it would be a cut-out. See, what they're suggesting is Anderson Cooper, okay, would be in this screen. Everything else would be green. He would be -- they would composite behind him the town hall scene that you see behind him. He would step outside, and his nose would get cut off. She would also be outside that box. If the box is only this big and he steps outside, she would also be outside that box, part of the composite, which would mean that she would have to be on location while he was somewhere else. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Would it be accurate to say if this theory of how -- if the setup that you're describing is true, would it be accurate to say then that the woman in the interview would not be actually looking at Anderson Cooper?</p> <p>A That's what it would mean. MR. ENOCH: Objection to form and leading. A It would mean that what you see in there is two people who are acting remarkably responsive to each other on a super-human level, in my opinion, because, you know, they wouldn't be looking at each other. She would be in one location. He would potentially be, according to this theory, in a CNN studio around the corner, down the block, miles away, if not on the other side of the globe. So they would not be in the same place at the same time to have that interaction if he stepped outside the bounds of the green screen and his nose got cut off. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Now, if somebody is wearing glasses in a green screen shot --</p> <p>A Uh-huh.</p> <p>Summary</p>
60:7 - 61:10	<p>Q -- will the green screen background that's being composited, will that show up in the reflection of their glasses? MR. ENOCH: Objection to form.</p> <p>A Sometimes.</p> <p>Q (BY MR. BANKSTON) If there's a projection being used? MR. ENOCH: Objection to form.</p> <p>A Depending how the lights are. If the lights are blasting against that green screen, yes. If the lighting guy takes that into accounts, they can -- you know, depending on the lights. If the lights are bright and blasting at them, yes, you would see green screen. Also depending on his proximity to the screen.</p> <p>Q (BY MR. BANKSTON) Okay. Maybe -- I think maybe I didn't ask -- the question was a little inartful there. Let's come back up here. If there's lights being shined on the green screen --</p> <p>A Uh-huh.</p> <p>Q -- then it might be possible to see green in some glasses?</p> <p>A Yes. MR. ENOCH: Objection to form.</p> <p>Q (BY MR. BANKSTON) My question is: If there's a background being put on that green screen, does it show up live there on the green screen; or is that just in the computer? MR. ENOCH: Objection to form.</p> <p>A It's just in the computer.</p> <p>Summary</p>
61:11 - 61:16	<p>Q (BY MR. BANKSTON) If a person's wearing glasses and they're being filmed against a green screen, will the projected image that's in the computer of the town hall, or whatever, appear in their glasses? MR. ENOCH: Objection to form.</p> <p>A Absolutely not.</p> <p>Summary</p>
61:17 - 62:3	<p>Q (BY MR. BANKSTON) Okay. Did you -- as a part of your discussions with people at InfoWars about Sandy Hook, have you raised complaints about this video allegation? MR. ENOCH: Objection to form, leading.</p> <p>A Not -- no. I mean, it was one of those things. I just kind of mixed it in with all the rest of it. It wasn't -- it was just one of those points that was just so silly. It's just I can't -- I couldn't believe that Alex was jumping all over that when he knows perfectly well YouTube pixels smudge. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
62:4 - 62:11	<p>Q (BY MR. BANKSTON) Was any -- were you -- at any time during your time at InfoWars past 2013, were you aware that parents had been complaining about this coverage?</p> <p>A No, not immediately. I really became aware of it sometime afterwards when I saw, actually, I think, a PBS special on what was going on; and it really hit home at that point. I was like, this is...</p>

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	Summary
62:12 - 62:25	<p>Q Well, you understand -- what is your understanding -- scratch that. Was the InfoWars staff aware of the public controversy they were causing with Sandy Hook allegations? MR. ENOCH: Object to form.</p> <p>A I believe they were.</p> <p>Q (BY MR. BANKSTON) Was the staff aware of the public opinion about their Sandy Hook coverage? MR. ENOCH: Object to form.</p> <p>A I believe they were. I believe that they were aware of a dual opinion at the same time, and they got a rush out of it. MR. ENOCH: Objection, nonresponsive.</p> Summary
63:1 - 63:4	<p>Q (BY MR. BANKSTON) Were you still employed at InfoWars at the time that Mr. Jones was interviewed by Megyn Kelly?</p> <p>A No.</p> Summary
63:5 - 63:14	<p>Q Did you ever become aware that parents were being harassed by believers in the Sandy Hook hoax conspiracy theory?</p> <p>A Yes, I became aware of that.</p> <p>Q When do you think you became aware of that?</p> <p>A Somewhere around 2014, 2015. Maybe 2015. Like I said, when I saw that PBS documentary.</p> <p>Q So the PBS documentary you saw, that was when you were employed at InfoWars?</p> <p>A I was still employed there.</p> Summary
63:15 - 63:24	<p>Q In light of the harassment that you became aware of, did it cause you to form any opinions about the level of caution that would be required in covering Sandy Hook from then on out? MR. ENOCH: Objection to form, leading.</p> <p>A Absolutely. Like I've already stated, I marched into the writers' room several times and attempted to point out that they have an ethical responsibility to abide by. MR. ENOCH: Objection, nonresponsive.</p> Summary
63:25 - 65:6	<p>Q (BY MR. BANKSTON) Do you feel, based on your personal knowledge inside the company, that InfoWars was responsive to those criticisms and began to act appropriately? MR. ENOCH: Objection to form.</p> <p>A No, I don't.</p> <p>Q (BY MR. BANKSTON) Okay, Mr. Jacobson. We are about an hour in.</p> <p>A Uh-huh.</p> <p>Q As you know, your deposition was ordered for, I believe it was two or two and a half hours today.</p> <p>A Uh-huh.</p> <p>Q I'm not going to keep you that long, but I am going to take a short break.</p> <p>A Uh-huh.</p> <p>Q And we do have some more to cover.</p> <p>A Okay.</p> <p>Q We might get near two hours -- I don't know -- but I'm going to try to get you out as soon as I can today. But why don't we for the moment -- we'll take a 15-minute break.</p> <p>A Uh-huh.</p> <p>Q And then we'll come back and resume after our break. Thank you. MR. OGDEN: Hey, Mark. Will you call my cell phone? MR. BANKSTON: Absolutely. THE VIDEOGRAPHER: We are off the record at 1:12 p.m. (Off the record from 1:12 to 1:30 p.m.) THE VIDEOGRAPHER: We're back on the record at 1:30 p.m.</p> Summary
65:7 - 65:13	<p>Q (BY MR. BANKSTON) Mr. Jacobson, earlier we had talked about a writing room; and I want to ask you questions about that room itself. That room was the center of the writing process at InfoWars; is that right?</p> <p>A Yes, up until the last three years that I worked there.</p> Summary

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65:14 - 65:21	<p>Q Okay. From your personal knowledge and observations of the writers, can you tell me, as it concerns the writing process for coverage of Sandy Hook, what, if anything, concerned you about that process? MR. ENOCH: Objection to form.</p> <p>A The fact that they took Halbig's word for it, and that was the article. The article was: Whatever came out of Halbig's mouth was news.</p> <p>Summary</p>
65:22 - 66:20	<p>Q (BY MR. BANKSTON) When you were, as you mentioned earlier, communicating your thoughts to people at InfoWars about the Sandy Hook coverage, can you describe to me on a scale of one, being not outrageous at all and ten, being extremely outrageous, on that one-to-ten scale, what is the level of outrageousness of this conduct that you were trying to impart? MR. ENOCH: Objection, leading and form.</p> <p>A It was a ten.</p> <p>Q (BY MR. BANKSTON) Tell me why you thought that. MR. ENOCH: Same objections.</p> <p>A I mean, it's one thing to make a mistake. It's another thing to have somebody come in -- and I don't even -- I'm not aware if I was the only person or not, but I know I was doing it -- to come in and say, "Hey, this is wrong. You're making a mistake." It's one thing, you know, to actually have a mistake and something else to have it pointed out to you, not just once but over and over and over again, and to not only hear the damage that you're doing to people outside of your zone but to actually laugh about it, I thought that's a ten. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
66:21 - 66:24	<p>Q (BY MR. BANKSTON) How long have you known Mr. Jones?</p> <p>A I've known Mr. Jones since he employed me in 2004.</p> <p>Summary</p>
66:25 - 67:17	<p>Q In your 15 years of knowing Mr. Jones, have you arrived at any kind of opinion about whether Mr. Jones is capable of rational action or whether he is too mentally unwell to even be capable of rational action? MR. ENOCH: Objection to form and leading.</p> <p>A In my 15 years of knowing Alex, I feel he is very capable of rational actions, and I think the growth of his business is evidence of that. Like, while his opinions may be tasteless, he definitely made conscious decisions to run a business. He flipped the switches himself. In fact, he micromanages that place; and, obviously, some of the decisions he made were successful. He took a business from a few handful of people to what it is today. So based on that evidence, I do feel that he's more than rational in his decisions. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
67:18 - 67:23	<p>Q (BY MR. BANKSTON) Based on your conversations and years with Mr. Jones, do you have an opinion on whether or not Mr. Jones can understand right from wrong? MR. ENOCH: Objection to form.</p> <p>A Yes.</p> <p>Summary</p>
67:24 - 68:12	<p>Q (BY MR. BANKSTON) Okay. What is your opinion?</p> <p>A I think he -- MR. ENOCH: Objection to form. A I think he knows right from wrong, and he can definitely distinguish it. And, again, it's not just my opinion on this. He goes on the air and proselytizes morality all the time, which, clearly, he knows what's going on; and he's making a conscious decision. If he can proselytize it and verbalize it and actually articulate it that well to everybody, then, he's definitely thinking about it; and he's aware of what's going on. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
68:13 - 68:19	<p>Q (BY MR. BANKSTON) With respect to your background, have you -- what is your level of experience and exposure to compositing live shots onto backgrounds?</p> <p>A I mean, in my experience, I've been asked to do it; and I've done it.</p> <p>Q Okay.</p> <p>A I've produced those videos.</p> <p>Summary</p>
68:20 - 68:25	<p>Q The films and things that you would make for InfoWars, did you perform any graphics work or</p>

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	<p>compositing work while working on those videos? A Mostly graphics works. I mean, aside from my video editing, I would do graphics much more than video compositing for the films. Summary</p>
69:1 - 69:4	<p>Q Does InfoWars in it's studio -- during the years you were there, did it perform any green screen or blue green compositing there at the facility? A Yes. Summary</p>
69:5 - 69:15	<p>Q When it comes to video technology, does that remain your profession today? A Yes. MR. ENOCH: Objection to form. A Yes. MR. BANKSTON: What's the basis on that? MR. ENOCH: I don't know what you mean by "video technology." It's vague and ambiguous. Q (BY MR. BANKSTON) Do you know what video technology is? A Yes, sir. Summary</p>
69:16 - 69:20	<p>Q When I ask you the question, you work in video technology, can you tell me what you mean by video technology? A I take technology designed to work on video as my tools and create a product for my clients. Summary</p>
69:21 - 70:1	<p>Q When it comes to video technology, are you someone who considers himself to have specialized knowledge or skill in that technical field? MR. ENOCH: Object to form. Speculating, form, and leading. A Yes. Summary</p>
70:2 - 70:14	<p>Q (BY MR. BANKSTON) Okay. Can you tell me how many years experience you have in working with video production and video technology? MR. ENOCH: Objection to form. A I have 17 years in video technology, and I have over 20 years -- over 20 years in media technology in general. Q (BY MR. BANKSTON) You understand the difference between a layman and a technical person? Do you understand those terms? A Yes, sir. MR. ENOCH: Objection to form. A Yes, sir. Summary</p>
70:15 - 70:21	<p>Q (BY MR. BANKSTON) When it comes to video production and video technology, do you consider yourself a layman; or do you consider yourself as someone who has technical expertise? MR. ENOCH: Objection to form. A I consider myself as somebody who has technical expertise. Summary</p>
70:22 - 71:15	<p>Q (BY MR. BANKSTON) Okay. Do you still have an opinion as to whether or not alternative media can be a force for good if done correctly? MR. ENOCH: Objection to form. A I feel that alternative media -- I think the subject is much bigger than that. I think that media in itself or journalism is when you cross the ethical boundary, then it will be a force for good; but if people are independent and refuse to abide by standards that are journalist standards that have been established for decades already and followed, or maybe even centuries by some standards, you know, if they refuse to do that, then no, it won't be a force for good. It will be a force for people to be confused and tear each other down. If they can figure out that, hey, who's going to be the standard of that. So I do think that there will always be a professional standard of journalism, and independent journalism should be put in its place. MR. ENOCH: Objection, nonresponsive. Summary</p>
71:16 - 72:1	<p>Q (BY MR. BANKSTON) When it comes to professionalism in journalism, do you have an opinion -- or let me scratch that. When it comes to professionalism in journalism, have you been exposed to events, perceived things with your own eyes and ears, that gives you an opinion on whether it went right or whether it went wrong as it regards Sandy Hook? MR. ENOCH: Objection, form. A I don't really have a comment on that. I'm not really sure. Summary</p>

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72:2 - 72:12	<p>Q (BY MR. BANKSTON) Okay. Do you today have any sense of guilt about the coverage about Sandy Hook that came out of InfoWars? MR. ENOCH: Objection to form, leading.</p> <p>A Yes. As I mentioned in my statements previously, the reason why I'm here is because of a tremendous amount of guilt that I didn't act faster. Maybe I should have quit. Maybe I could have caught the story faster or been better at explaining; but, yes, I do. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
72:13 - 72:17	<p>Q (BY MR. BANKSTON) Are you still on friendly terms with InfoWars?</p> <p>A No.</p> <p>Q Were you terminated?</p> <p>A Yes.</p> <p>Summary</p>
72:18 - 72:19	<p>Q Have you filed a complaint with the EEOC?</p> <p>A Yes.</p> <p>Summary</p>
72:20 - 73:23	<p>Q And just for the record, I want to make it clear because I've used an abbreviation. You filed a complaint with the Equal Opportunity Employment Commission?</p> <p>A Yes, sir.</p> <p>Q Tell me why you filed a complaint.</p> <p>A Alex's abusive behavior and the unethical and racist behavior of his staff and the environment that's racist and abusive in general at InfoWars. MR. ENOCH: Objection, nonresponsive. Move to strike. A There was evidence against me that I submitted to the EEOC of myself being Photoshopped onto a Rabbi's face and passed around the office. There was Owen Schroeder sitting on the air calling me the resident Jew, as well as Rob Dew. There was a culture of anti-Semitism inside InfoWars. And so I went to the EEOC with that and a culture of abuse propagated mostly by Alex Jones himself. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Do you know, sitting here today, if you're the only person who's brought such a complaint or if there's anybody else who's brought similar complaints? MR. ENOCH: Objection to form.</p> <p>A I know of several people who have brought exactly the same complaint or similar, very similar complaints about Alex Jones and the office of InfoWars, many of which are public.</p> <p>Summary</p>
73:24 - 75:9	<p>Q (BY MR. BANKSTON) Do you feel that people might look at your EEOC claim and think you're biased?</p> <p>A I feel, yes, people will look at my EEOC complaint and claim that I'm biased. Should I continue?</p> <p>Q No. I have a question for you.</p> <p>A Okay.</p> <p>Q If you've got an EEOC claim and you've got bad blood with InfoWars, why should people believe you?</p> <p>A Because people should understand just because Alex -- I have a complaint with Alex doesn't make Alex an angel. Myself and others have all witnessed it. I am doing my due diligence in bringing forth abuse that Alex had against me as others have brought forth Alex -- abuse that Alex has against them as well as the fact that does not negate the fact that this stuff about Sandy Hook didn't happen, either. What happened to me is real. What Alex did to the Sandy Hook parents is also real at the same time. Just because one is true doesn't make the other untrue. They're both true at the same time. Alex is an abusive man. Alex -- and every testimony that you see in public, whether it is, you know, on the record -- you know, we have videos and specials all over the place, news articles written about this. It's no secret of Alex's behavior. It's no secret. Therefore, you know, just because I mounted a complaint because of Alex's bad behavior doesn't mean he behaved badly for Sandy Hook. People should understand just because one is true, the other -- it doesn't mean the other's automatically untrue. MR. ENOCH: Objection -- A Are they going to feel that I'm biased? Yes, but that doesn't mean -- you know, everything is true that I am saying. And again... MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>

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75:10 - 75:13	<p>Q (BY MR. BANKSTON) If the Sandy Hook parents who brought these suits were awarded money from Alex Jones, would it benefit you in any way?</p> <p>A No.</p> <p>Summary</p>
75:14 - 75:20	<p>Q If the Sandy Hook parents who brought these suits are awarded money from Mr. Jones, let's say, a significant amount of money, do you know of any way that could be a detriment to you?</p> <p>A The one way is if the EEOC rules in my favor, it might jeopardized a potential compensation for myself farther down the line.</p> <p>Summary</p>
75:21 - 85:10	<p>Q So you -- do you feel that if the Sandy Hook parents are ultimately compensated by Mr. Jones, do you have any opinion about whether that could potentially threaten your ability to get compensation for your injuries?</p> <p>A I'm not doing any of this for compensation. I'm doing this because Alex is disgracing himself so badly in the way he has made the parents suffer, as well as myself. He's still on the air to this day saying things that are arguably true or arguably not true; we don't know. But we do know that he affects his audience in a way that angers and mobilizes them; and it's unclear if anything he's saying is fact or fiction, opinion or speculation. But what he does do is mobilize a large amount of people in irrational thinking because there's no way to tell whether what Alex is saying on the air is news or not, true or false, speculation, or opinion, jokes or not; but he advertises it all as news. He is the InfoWars.</p> <p>MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Mr. Jacobson, have -- all of your answers today, have they been based on your personal knowledge? MR. ENOCH: Objection to form.</p> <p>A As far as I know.</p> <p>Q (BY MR. BANKSTON) Okay. Mr. Jacobson, that's all I believe I have for you at this time. MR. ENOCH: Go ahead. I'm sorry. I didn't mean to interrupt you. MR. BANKSTON: Sure. That's all I have for you in terms of questions. I have a few things I need to put on the record. MR. OGDEN: Mark, can you check your e-mail? MR. BANKSTON: Yeah, sure. They don't need to concern you. If you would like to be excused while I put this on the record, I can do that. MR. ENOCH: And I would like to ask questions. Are you going to prevent me from doing that, Mark? MR. BANKSTON: We're going to talk about that on the record in just a minute. MR. ENOCH: Well, that's what I'm asking you. MR. BANKSTON: Yeah, so we're going to let Mr. Jacobson go because we're not going to have this discussion in front of a witness. MR. ENOCH: No, sir, we're not gonna -- MR. BANKSTON: We're not going to let him leave the building, Mark. We're going to let Mr. Jacobson go to the bathroom, and then I'm going to put something on the record. And if you have some things to say about it, you can say whatever you want on the record. And then Mr. Jacobson will be in the building. MR. ENOCH: Are you going to permit me to ask questions, yes or no? MR. BANKSTON: I don't think I can stop you. I literally don't think I can. I think I would have to, like, go over there and physically restrain you because you won't abide by rules; but Mr. Jacobson is just going to go to the bathroom. Now, he's going to come back; and he's going to sit down in that chair. And whether he wants to sit around and listen to anything you say is not my choice, but I'm not releasing him from the building right now. Mr. Jacobson, would you like to step out of the room, maybe, for a moment? You can use the restroom if you need to; otherwise, just wait in the front room for us. (Witness leaves the conference room.) MR. ENOCH: What is it you would like to say outside of his presence? MR. BANKSTON: Okay. I have a few things I need to put on the record. First of all, just to read it really quick, there is an order entered in this case concerning this deposition. In Paragraph 3 of the Judge's Discovery Order, it allows that Plaintiff's Motion is granted and that Plaintiff may take the deposition of Robert Jacobson. It does not say that the parties may take the deposition of Robert Jacobson. It says the Plaintiff may take the deposition of Robert Jacobson. The Civil Remedies Code provides that limited discovery will be allowed if the party shows good cause for that discovery and gets an order from the Court on that limited discovery. Plaintiff has gotten an order from the Court showing good cause. Defendants have never attempted to show good cause and, in fact, under the case law is extremely questionable and I see no authority for an idea that a defendant would ever be granted discovery on its own motion. The discovery is granted for the Plaintiff to meet the burdens, the onerous burdens caused by the TCPA.</p>

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Nonetheless, Mr. Enoch has attempted right from the start to interrupt and hijack my deposition, which I have properly noticed, and start asking the witness questions, questions which the witness was visibly uncomfortable with. This witness agreed to appear voluntarily at this deposition with the understanding that he would be questioned by the Plaintiff's counsel. He has appeared without his own personal counsel and was suddenly ambushed by a barrage of questions from his former employer, questions he was not expecting. I need to put this on the record for we are now on our the third deposition of this case; and in the first deposition of Mr. Jones, which Mr. Enoch was not defending but was merely an observer, his name appeared in all caps where's he's speaking and interjecting into the record 28 times during the testimony of Mr. Jones; and that's taking out the times that it appeared for housekeeping matters, like getting the witness water or talking about the PO at the end of the deposition. And I don't want to be tag-teamed and it was ridiculous and improper but I normally wouldn't call it out on the record but I reviewed the transcript -- and I've done this to confirm this -- that there were questions on the floor about what a certain building was and whether it was the school or not. And as part of his interruption, Mr. Enoch blurted out to

[Summary](#)