

EXHIBIT 5

In the Matter Of:

DORWORTH V. GREENBERG

6:23-cv-00871-CEM-DCI

CHRISTOPHER DORWORTH

August 06, 2024



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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

CHRISTOPHER E. DORWORTH,
Plaintiff,

vs. Case No: 6:23-cv-00871-CEM-DCI

JOEL MICAH GREENBERG
ANDREW W. GREENBERG, SUSAN
GREENBERG, ABBY GREENBERG,
AWG, INC., GREENBERG DENTAL
ASSOCIATES, LLC, GREENBERG
DENTAL & ORTHODONTICS, P.A.,
GREENBERG DENTAL SPECIALTY GROUP, LLC,
AND A.B.,

Defendants.

_____/

VIDEOTAPED/VIDEOCONFERENCE
DEPOSITION OF: CHRISTOPHER DORWORTH
DATE: TUESDAY, AUGUST 6, 2024
TIME: 9:04 A.M. - 5:21 P.M.
PLACE: 200 SOUTH ORANGE AVENUE
SUITE 10000
ORLANDO, FLORIDA 32801
STENOGRAPHICALLY
REPORTED BY: AMBER PORTELLO

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9 ALSO PRESENT:

10 Fred Gartrell, Videographer
11 Abby Greenberg (Via Zoom)
Lisa Di Filippo (Via Zoom)

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20 -----

21 S T I P U L A T I O N S

22 It is hereby stipulated and agreed by and between
23 the counsel for the respective parties and the deponent
24 that the reading and signing of the deposition
25 transcript be reserved.

1 P R O C E E D I N G S

2 *****

3 THE VIDEOGRAPHER: Good morning. We are now on
4 the record. Today is Tuesday, August 6, 2024. The
5 approximate time, 9:02 a.m. This is the deposition
6 of Christopher E. Dorworth being taken in the matter
7 of Christopher E. Dorworth versus Joel Micah
8 Greenberg, et al.

9 Will counsel please state their appearance for
10 the record? After which, our court reporter,
11 Ms. Amber Portello, will administer the oath to the
12 witness?

13 MR. ANDRADE: Alex Andrade on behalf of the
14 plaintiff, Chris Dorworth.

15 MR. PERKINS: Jason Perkins on here on behalf
16 of the defendant, Abby Greenberg.

17 MR. WERMUTH: Fritz Wermuth on behalf of Andrew
18 Greenberg, Susan Greenberg, and AWG, Inc.

19 MR. RITTER: Quinn Ritter on behalf of Andrew
20 Greenberg, Susan Greenberg, and AWG, Inc.

21 MR. PERKINS: It looks like the folks on Zoom,
22 go ahead and enter your appearances.

23 MR. ANDRADE: I think we may be muted.

24 MR. PERKINS: Okay. We have entered our
25 appearances, so if the folks on Zoom, the attorneys

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1 on Zoom can enter their appearances.

2 MR. SCHELLER: This is Fritz Scheller on behalf
3 of Joel Greenberg.

4 MS. CHOMIN: This is Katie Chomin on behalf of
5 the Greenberg Dental defendants.

6 MR. FOSTER: James Fosters with Wicker Smith on
7 behalf of Andrew Greenberg and Sue Greenberg.

8 MR. PERKINS: All right. Very good.

9 COURT REPORTER: Would you raise your right
10 hand, please?

11 Do you solemnly swear or affirm that the
12 testimony you're about to give in this cause is the
13 truth, the whole truth and nothing but the truth?

14 THE WITNESS: I do.

15 THEREUPON

16 CHRISTOPHER DORWORTH
17 was called as a witness and, having first been duly
18 sworn, testified as follows:

19 DIRECT EXAMINATION

20 BY MR. PERKINS:

21 Q. Good morning, Mr. Dorworth?

22 A. Morning.

23 Q. My name is Jason Perkins. We met briefly
24 before. I represent the defendant, Abby Greenberg, in
25 this matter. I'm going to be asking you some questions

1 first today.

2 Could you please state and spell your name?

3 A. Sure. It's Christopher E -- Erickson Dorworth.
4 It's C-H-R-I-S-T-O-P-H-E-R; middle name is Erickson,
5 E-R-I-C-K-S-O-N; last name is Dorworth, D, as in David,
6 O-R-W-O-R-T-H.

7 Q. Very good. And your date of birth is **REDACTED**
8 1976, correct?

9 A. Correct.

10 Q. Your current cell phone number is **REDACTED**
11 **REDACTED**, correct?

12 A. Yes.

13 Q. Have you had any other cell phone numbers since
14 January 1, 2017, other than **REDACTED** ?

15 A. No.

16 Q. What is your current business address?

17 A. My home 1520 Whitstable Court, Lake Mary,
18 Florida 32746.

19 Q. And is 1520 Whitstable Court, is that your
20 homestead?

21 A. It is.

22 Q. And who currently lives with you at that
23 address?

24 A. Myself, my wife, Rebekah, my daughter, **REDACTED**,
25 and my son, **REDACTED** .

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1 Q. And what kind of security do you have at 1520
2 Whitstable Court?

3 A. Could you be a little more clear with that?

4 Q. Do you have like doorbell cameras or anything
5 like that?

6 A. Yeah, we have Ring cams and the Ring
7 thermostat. There is something that's done through the
8 neighborhood; but we have something like 80 windows in
9 the house or something, and the odds that one doesn't --
10 it was just constantly going off, so we haven't used
11 that since -- I have lived there for 19 years. Probably
12 haven't used it for 15 of them.

13 Q. What is the name of the security company that
14 furnishes security for your home?

15 A. I have no idea. It's all done through the
16 neighborhood. We don't --

17 Q. It's through the Heathrow Master Association?

18 A. Yes, sir.

19 Q. In 2017, in the summer of 2017, did you have
20 Ring cameras that were operational on the house?

21 A. No. I don't think they existed yet, but no.

22 Q. Other than 1520 Whitstable Court, do you own --
23 personally own any other real property?

24 A. Yes.

25 Q. And would that be the 30 Buena Vista Drive in

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1 Highlands --

2 A. It's technically two houses. It's 26 and 30
3 Buena Vista Drive. It's platted somewhat strangely, but
4 there is a main house that's about 3,000 square feet.
5 The second house is 1,200 square feet, and it's a
6 two/two. So it's 26 and 30 Buena Vista. It's on one
7 unified tract of land, but it's two houses.

8 Q. And that's in Highlands, North Carolina?

9 A. Yes, sir.

10 Q. And are both of those properties owned by the
11 Christopher E. Dorworth living trust?

12 A. I don't know. We went through a -- we did our
13 will -- whatever we did, whatever they said to do, I
14 did; but, yes, I believe so. I haven't checked that
15 lately.

16 Q. And then so those two properties would be
17 owned -- it sounds correct it's owned by the Christopher
18 E. Dorworth living trust, the two Highland properties?

19 A. I think so. I mean, it was I bought it myself,
20 and then I did my will a couple years back and I think I
21 transferred it there, but I don't remember honestly. I
22 think so. It sounds right, but I don't...

23 Q. And is 1520 Whitstable Court owned by yourself
24 and your wife, Rebekah?

25 A. Yes.

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1 Q. So this litigation that we're here about today
2 was filed on April 7th, correct?

3 A. That sounds right.

4 Q. That sounds right. Other than the instant
5 litigation that we're here about today, what other
6 litigation have you been involved in personally? And I
7 know about your divorce with your exwife --

8 A. Yeah, I got divorced in 2013. We just -- you
9 want to go through all the legal things? Is that it?

10 Q. Correct. Yeah.

11 A. This could take a few... So we'll go back.
12 There was the -- we'll just talk about everything going
13 on right now. I have this litigation against all of
14 you. I have -- I am in a dispute over my airplane. The
15 guy who maintained it didn't maintain it, so there is
16 litigation going there. And I don't know if it's
17 considered litigation or not, but I filed an intent to
18 sue my insurance company over a roof. I think you just
19 file a notice of intent. I'm not sure that that's a
20 litigation process, but we're at the umpire so it would
21 probably be enough where I should at least mention it.

22 So there is -- that is what -- I guess that's
23 not -- well, I guess it is personal because they listed
24 me individually, but that is done through a company. So
25 then there was the Expressway Authority stuff in 2013

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1 when I was charged with my second -- I think it was a
2 first or second degree misdemeanor for violating the
3 Sunshine Law. That took a couple years. There is an
4 appeal of that. I feel like I have other stuff right
5 now that's not...

6 Q. The Heathrow Master Association?

7 A. Yeah. Yeah, the Heathrow Master Association.
8 They -- they -- we had a dispute, and we sued on that
9 one. There's been some business stuff that -- like I
10 don't think that would be personal. I feel like I'm
11 missing something right now. That -- it's kind of -- I
12 don't think I used Mike Sasso for that. I'm sure there
13 has been other stuff too, but I'm sorry. There is quite
14 a bit of it --

15 Q. If something comes to mind --

16 A. Yeah, sure. Yeah.

17 Q. -- just let me know in the course of the
18 deposition.

19 The 2013 divorce proceedings, that was in
20 Seminole County, correct?

21 A. Kind of. I filed in Seminole County, but all
22 the judges in the county recused themselves. So it
23 wound up going over to Volusia County -- oh, also River
24 Cross I guess would be the other big, prevalent lawsuit,
25 but it's not a personal thing. Although I think I did

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1 actually sue them as an individual, so that would be
2 personal. So River Cross would be the other --

3 Q. River Cross you have a state court action, and
4 a federal court action for that?

5 A. I did. Yeah, they're both put away.

6 Q. And River Cross is currently in bankruptcy,
7 correct?

8 A. Yes. It has no assets, and it has a judgment
9 against it -- or award of attorneys' fees against it, so
10 it is Chapter 7.

11 Q. And that award of attorney fees is for
12 approximately \$400,000?

13 A. I think 422. Somewhere in there.

14 Q. And in the divorce proceedings, the Seminole
15 County judges recused themselves, so I think it was a
16 Brevard County judge that --

17 A. I want to say Turner, but I don't know. I can
18 see his face, but I don't know.

19 Q. You also had the fraudulent transfer
20 litigation --

21 A. Right. Right.

22 Q. -- pending in Seminole County?

23 A. I thought you were referencing that with this
24 one when you said the immediate action, but, yes.

25 Q. And then this airplane action that somebody

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1 didn't maintain your airplane, where is that pending?

2 A. Seminole County.

3 Q. Seminole County?

4 A. He filed the suit; we filed a countersuit.

5 Q. What's the name of the person that filed the
6 suit?

7 A. The lawyer or the plaintiff?

8 Q. The entity.

9 A. His name is Joe Lamiroult. I think I want to
10 say the name of his company is Key West Air Transport or
11 something like that. Key West something or other.

12 Q. And what kind of plane do you own?

13 A. A Cessna 421c Golden Eagle.

14 Q. And when did you purchase the Cessna?

15 A. I want to say maybe 2019. It all kind of
16 blends together now.

17 Q. Are you a pilot?

18 A. No.

19 Q. Do you hire a pilot to take you around?

20 A. I do, yes.

21 Q. Is the plane operational currently? Can you
22 fly it?

23 A. No, that's why we're suing.

24 Q. When was the last time your plane, the Cessna,
25 has been operational?

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1 MR. ANDRADE: Object to form. Just curious how
2 much this type of financial information you can
3 inquire about.

4 THE WITNESS: Do I answer the question?

5 Yeah, you're --

6 BY MR. PERKINS:

7 Q. Go ahead and answer.

8 A. Well, this is going to take me a second to
9 figure out. So I want to say 2021, later 2021. That is
10 when the maintenance was due, and the guy didn't do it
11 and so I have not flown it since then.

12 Q. How many times have you been deposed
13 previously?

14 A. I couldn't count them on one hand. Probably
15 five or six times.

16 Q. Five or six times. When was the last time you
17 were deposed?

18 A. I believe that would be in the River Cross
19 case, the federal case.

20 Q. The federal case? And approximately what
21 timeframe was that that you were deposed with River
22 Cross?

23 A. Well, when was the pandemic, 2021?

24 Q. February 2020, March 2020 is when it started.

25 A. So around that.

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1 Q. Around that time?

2 A. It was before that, but it was around then.

3 Q. Just a few ground rules for today. If you need
4 a break, let me know, and I'll be happy to accommodate
5 you. Just answer the question before we --

6 A. I subscribe to the Dr. Katsur philosophy. If I
7 don't need a breaks. We'll go as short as we possible
8 can and just go through it.

9 Q. All right. Very good. And if you don't
10 understand my question, ask for clarification. I'll be
11 happy to clarify it. If we can make sure our answers
12 today are audible. A lot of time during the course of
13 the deposition people will do shoulder shrugs and
14 whatnot. If you could make sure you're audible. Avoid
15 talking over each other. I know you're going to
16 anticipate my questions and want to answer, but if you
17 could let me finish my question, then sometimes of
18 course your counsel will object to the question and then
19 you can go ahead and answer unless your attorney
20 instructs you otherwise.

21 Do you understand those ground rules?

22 A. Yes.

23 Q. What did you do to prepare for today's
24 deposition, and I don't want to know about discussions
25 with your attorney?

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1 A. I reread the amended complaint and the original
2 complaint.

3 Q. And when did you do that?

4 A. Yesterday. I wouldn't say I deep dived them.
5 I read over them.

6 Q. And when -- what day did you retain Moore, Hill
7 & Westmoreland?

8 A. What day was that? Last week. The day after
9 the deposition.

10 Q. Okay. The day after Rebekah Dorworth's
11 deposition?

12 A. Yes.

13 Q. And does Moore, Hill & Westmoreland also
14 represent Rebekah Dorworth?

15 A. I don't know the answer to that question. I
16 don't know.

17 MR. ANDRADE: So I'm not under oath or being
18 deposed today, so I can't --

19 THE WITNESS: I don't know. I don't know.

20 MR. ANDRADE: I would like to help you, but --

21 THE WITNESS: I got you. That's a
22 transactional thing. I just don't know if she's
23 covered or not.

24 MR. ANDRADE: It's up to your personal
25 knowledge. I don't want to --

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1 THE WITNESS: I got you. I got you. I got
2 you.

3 BY MR. PERKINS:

4 Q. As you sit here today, you don't know the
5 answer to that question, correct?

6 A. I assume she's protected and covered by it, but
7 I don't -- I'm not a lawyer, so I don't know if there is
8 official paperwork you have to fill out or whatever that
9 is. I think she is looking -- Alex here is looking out
10 for myself and the Dorworth family as a whole.

11 Q. And how are you feeling physically today?

12 A. Good.

13 Q. I know that the day after your wife's
14 deposition you weren't feeling well --

15 A. All day I was trying to muscle through on that
16 one, but it was just not meant to be.

17 Q. Okay. So you're not currently suffering from
18 any ailments or infections, is that a correct statement?

19 A. I feel good.

20 Q. Okay. Are you currently on any medications
21 that would affect your testimony?

22 A. No.

23 Q. Your exwife's name was Elizabeth Dunzenberry?

24 A. Dusinberre.

25 Q. Dusinberre. And Ms. Dusinberre is an attorney,

1 correct?

2 A. Correct.

3 Q. And my understanding is that she currently
4 lives and works in the metropolitan Jacksonville area?

5 A. Correct.

6 Q. And she practices estate and family law?

7 A. I think so, yes. We have never real discussed
8 her practice.

9 Q. And you got married to Ms. Dusinberre on August
10 26, 2000, correct?

11 A. Yes.

12 Q. You had two children with Ms. Dusinberre,
13 correct?

14 A. Correct.

15 Q. REDACTED and REDACTED.?

16 A. Yep.

17 Q. REDACTED was born REDACTED, 2001, and REDACTED,
18 REDACTED., was born on REDACTED 2003?

19 A. Correct.

20 (Exhibit 94 was marked for identification.)

21 BY MR. PERKINS:

22 Q. I want to put some documents up on the... I'll
23 share it here. All right. And this will be the first
24 exhibit we'll mark for the day, Exhibit 94.

25 And this is the petition for dissolution of

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1 marriage with Ms. Dusinberre, correct?

2 A. It looks like it.

3 Q. And it looks like from this document you
4 separated on or about July 17, 2009, is that a fair
5 statement?

6 A. That was the day she asked me for a divorce,
7 yes.

8 Q. And you filed -- it looks like you verified
9 this petition on September 7, 2010?

10 A. It sounds about right.

11 Q. And it looks like from the docket that you got
12 a final judgment of divorce on September 24, 2013.

13 Does that sound correct?

14 A. That sounds about right.

15 Q. And in this case, there has been some
16 discussion about the timesharing agreement with your
17 exwife. You have sat through a bunch of these
18 depositions, correct?

19 A. Yes, sir.

20 (Exhibit 95 was marked for identification.)

21 BY MR. PERKINS:

22 Q. And I'm going to put that timesharing agreement
23 up on the screen next, and I'm going to mark it as
24 Exhibit 95.

25 All right. Exhibit 95, timesharing agreement

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1 with Ms. Dusinberre?

2 A. That's right.

3 Q. All right. And do you recognize this document?

4 A. Yes.

5 Q. And this is a document that apparently governs
6 summer timesharing with your two eldest children in the
7 summer of 2017; is that correct?

8 A. It appears to be, yes.

9 Q. And it says that you would get the children
10 from June 2, 2017, 9:00 a.m. to June 22, 2017, at 9:00
11 a.m., correct?

12 A. Correct.

13 Q. And is that what happened in the summer of
14 2017?

15 A. Yes. As a general rule, we were incredibly
16 compliant with whatever these documents were because any
17 sort of -- at the time, it was more of a tense thing, so
18 there would be no deviation from this. It would be very
19 if this is what it said, this is what we did.

20 Q. And do you recall where you would pick up your
21 children from the prior marriage?

22 A. One of the idiosyncrasies of that divorce is
23 100 percent of the time I had to pick them up at their
24 mom's house.

25 Q. And she lived in College Park at the time?

1 A. She lived off of Smith Street in College Park.

2 Q. Specifically she lives at **REDACTED**

3 **REDACTED** --

4 A. Correct.

5 Q. Does that sound right?

6 A. Yes.

7 Q. And would you drop the kids off in College Park
8 as well?

9 A. Yes.

10 Q. At your exwife's residence?

11 A. Yes.

12 Q. Do you recall what specific time you would have
13 dropped off your kids pursuant to this stipulated order
14 back in the summer of 2017?

15 A. I mean, plus or minus ten minutes.

16 Q. Plus or minus ten minutes of 9:00 on Thursday,
17 June 22, 2017?

18 A. Yes.

19 Q. Would you have any records reflecting when you
20 would have dropped the children off at your exwife's
21 house at **REDACTED**?

22 A. Working backwards, I don't know a record there
23 would be. We didn't do like an official receipt signoff
24 for the kids or anything. They were 14 and 16 at the
25 time. My wife did not -- my exwife did not live in a

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1 gated community, so there would be no security gate to
2 go through, so no. At first blush, I could think of
3 none.

4 Q. Would there be any like Epass records or any
5 type of toll roads that you would have taken?

6 A. Well, I live in Heathrow --

7 Q. So all I4?

8 A. You would go from Exit 98 and Exit 82 I want to
9 say it was maybe, or whatever the Princeton one was. I
10 could do that one as well. So no, the -- now that there
11 are the Lexus lanes or whatever they call them, but they
12 didn't back then.

13 Q. Was there any type of parental coordination
14 like a parenting assistant that helped you facilitate
15 disputes with your exwife?

16 A. No.

17 Q. Nothing like that?

18 A. No. It would have been a good idea, but no.

19 Q. You sat through your current wife, Rebekah
20 Dorworth's, deposition; is that correct?

21 A. Yes.

22 Q. Did you sit through the entire thing?

23 A. I was not well that day, but I sat in front of
24 a computer screen the entire day but I really wasn't --
25 I was not -- I don't think I missed any of it, but there

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1 was plenty of time that I was not zoned in on it.

2 Q. And when you say you were not feeling well, can
3 you describe that for me?

4 A. Well, I had gone to the Republican National
5 Convention the week before in Milwaukee and got one of
6 those RSV, norovirus type things where it basically
7 wipes out your entire -- my sinuses were messed up. My
8 stomach was messed up. Couldn't keep food down. I
9 gagged. It was pretty unpleasant.

10 Q. And when did you first experience those
11 symptoms coming back from the RNC?

12 A. Well, the first time I experienced those
13 symptoms was at the RNC. I didn't know what it was. I
14 went to bed one night and woke up on my birthday and
15 felt like hell warmed over. And that was not due to any
16 sort of partying or anything, it was just a general
17 sickness. But it kind of kept -- it stayed together for
18 a few days, and then it just -- for two or three days,
19 it was very unpleasant.

20 Q. Ms. Dorworth testified that you two started
21 dating in the spring of 2012; is that correct?

22 A. Yes.

23 Q. Ms. Dorworth testified that you first started
24 texting her on February 18, 2012 --

25 A. That was the date.

1 Q. -- is that correct?

2 A. Yes. I was in the Chick-fil-A drive thru.

3 Q. You got married to Ms. Dorworth on November 5,
4 2017; is that correct?

5 A. Correct.

6 Q. You have one child with Ms. Dorworth, correct?

7 A. Correct.

8 Q. And her name is REDACTED, and she was born on
9 REDACTED, 2017; is that correct?

10 A. That's her, yes.

11 Q. Ms. Dorworth testified that you have an open
12 and transparent relationship.

13 Do you recall that testimony?

14 A. Yes.

15 Q. Is that a true statement?

16 A. Very true statement.

17 Q. What does that mean to you?

18 A. You know, a lot of couples, they kind of
19 keep -- they separate their lives. You know, there
20 is -- people -- there is like a whole thing on the
21 internet about people who don't keep their phones open,
22 you know, if someone else can do it. My wife and I
23 don't do that. She has all my emails. She -- you know,
24 we leave our phones unlocked and in front of each other
25 all of the time. We have very open and clear

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1 relationship, very based on trust. It's my second
2 marriage, so I learned some things that were -- that
3 didn't go well the first time around. I have just tried
4 to make that part of our policy.

5 Q. And when you say that Ms. Dorworth has access
6 to your emails, can you be more specific in that regard?
7 Does she get your emails that come into you?

8 A. I mean, I don't route them to her computer, but
9 Rebekah pays our bills. So she's in charge of the
10 financial stuff. So, you know, it would not be uncommon
11 for her to go in my e-mail to see if there was a bill.
12 I'll even say sometimes, Hey, babe, we just got
13 something from Landscape Architect, can you take care of
14 it?

15 Q. Does she have your passcode to get into your
16 emails?

17 A. I think she's just logged in. I think it's
18 just one of those things where you go on the computer.
19 I don't know if she -- I don't know my own passcode, so
20 she might, but I couldn't tell you what it is. Just
21 generally, you just log in. Do you want to log in as
22 Chris? Do you want to log in as Rebekah? She can do it
23 either way. So I guess that's the same thing, but I
24 don't know if she knows my e-mail password because I
25 truly don't.

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1 Q. Okay. But she can log into the computer and
2 see your emails?

3 A. Yeah. On her computer, yeah.

4 Q. And that would be your Yahoo emails and Gmail?

5 A. Gmail, yeah. I don't really use Yahoo and have
6 not for awhile.

7 Q. Your primary account is a Gmail account?

8 A. Sure. Yeah, I find e-mail to be generally
9 un-useful these days. You get about 700 spam messages
10 for every one that matters. I tell people if you send
11 me an email that you need me to see, there should be a
12 text so I can look for it because it's just the spam
13 universe has gotten overwhelming. So I don't -- I guess
14 that would be my primary email, but I don't -- I'm not
15 much of an email guy.

16 Q. What is your main course of communication?
17 What vehicle do you use?

18 A. My phone.

19 Q. Texting?

20 A. Yeah. I mean, sometimes. I have lived -- I
21 have been in public affairs for a long time, and I
22 worked for Ballard Partners which was a multinational --
23 it was all over the world. You know, so we were -- we
24 were highly versed on cyber threats, and we were
25 basically told to never put that you didn't expect to

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1 see on the front page of a newspaper. So if I've got
2 something to say, I usually make a phone call. But,
3 yeah, just casually, like, Hey, can you pick me up?
4 Sure. What time, what's your address, that kind of
5 stuff, that would be the most I'd say cell phone.

6 Q. Do you have a Snapchat account?

7 A. No. I've never had a Snapchat.

8 Q. Do you have -- in the summer of 2017, it
9 appeared that you had a Signal account; is that true?

10 A. I have a Signal account. I've never had a
11 Snapchat account.

12 Q. Okay. You still have a Signal account --

13 A. Yeah.

14 Q. -- as we sit here today?

15 A. Yes. It's kind of -- that is how a lot of
16 people communicate and in the political realm.

17 Q. And why do people in the political realm use
18 Signal?

19 A. You'd have to ask them. It's just very
20 popular.

21 Q. Why do you use Signal?

22 A. Because other people in the political realm use
23 Signal. I meet them where they are.

24 Q. Are there any distinct features of Signal --

25 A. I am not an expert on --

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1 Q. -- that makes it more palatable than other
2 apps?

3 A. I like it because it looks like iMessage. It's
4 blue --

5 Q. Do the messages disappear after a certain
6 amount of time.

7 A. I think you can set that standard, but I'm not
8 really much of an IT guy.

9 Q. Is that standard set on your phone where the
10 messages disappear after a certain amount of time?

11 A. For some people but not for others.

12 Q. For some of the people that you're texting
13 with, they disappear; is that correct?

14 A. Yes.

15 Q. And then for others they don't disappear?

16 A. Correct -- well, you're talking about Signal or
17 text messages?

18 Q. Signal?

19 A. Yeah. I think iMessage -- with iMessage you
20 can basically say delete my messages after a month or a
21 year, and I think with Signal you can go through
22 everyone and do it differently if I'm not mistaken. But
23 I do not hold myself out as an any sort of expert on
24 messaging apps.

25 MR. ANDRADE: I'm sorry, Jason, I think this

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1 power strip might be off, and I think it's powering
2 his laptop. I'm just going to press this and hope
3 nothing explodes.

4 MR. PERKINS: Okay.

5 MR. ANDRADE: We're good.

6 MR. PERKINS: Is it on?

7 MR. ANDRADE: I was just worried that it would
8 somehow --

9 MR. PERKINS: Very good.

10 BY MR. PERKINS:

11 Q. On your iPhone with iMessage is it set for
12 after a year the messages --

13 A. It was for a very long time. I don't think it
14 is anymore. I think we got rid of that as a function of
15 when the feds reached out to us in the Greenberg matter.

16 Q. Okay. And when did the feds first reach out to
17 you in the Greenberg matter?

18 A. When did Joel get -- Joel got indicted in June
19 2020, so I think -- whenever Joel went to jail after he
20 burned all Abby's stuff is when all of it started
21 happening. I want to say that was at the end of 2020.
22 Yeah, that sounds about right. I'm sorry, the time
23 blurs together. It's hard for me to believe that was
24 four years ago.

25 Q. And who specifically from the federal

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1 government reached out to you?

2 A. A guy named Todd Gee.

3 Q. And how did he reach out to you?

4 A. I think my attorney actually reached out to
5 him. We had gotten some word that we had showed up in
6 some other subpoenas, so I called him and Richard
7 Hornsby called Todd.

8 Q. Did you ever personally meet with Todd Gee?

9 A. Yes.

10 Q. On how many occasions?

11 A. Once.

12 Q. And where was that meeting?

13 A. FBI headquarters in Maitland.

14 Q. And it was at that interview?

15 A. Yes.

16 Q. Besides yourself, Mr. Hornsby, Mr. Gee, who was
17 there?

18 A. There was -- a very memorable moment. It was
19 about half the size of this room. There was no air
20 conditioning. There was me, Richard, we're both big
21 guys, and then six of them total, two of whom were from
22 the Department of Justice, whatever the corruption
23 unit -- public integrity unit, and then the other four
24 were FBI. One of them was Alexander Duda. He's the
25 only name I remember because I know his family, and then

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1 I remember one guy said -- I don't know his name, but he
2 said he was from the violence against children unit or
3 something like that. I don't know who the other ones
4 were.

5 Q. How long did this in-person interview last?

6 A. Three hours, give or take.

7 Q. And what was the subject matter of the
8 interview?

9 A. Joel and Matt.

10 Q. Did any -- was there any discussion about "AB"
11 at this --

12 A. Yes.

13 Q. -- meeting?

14 And you understand "AB" to be "AB"?

15 A. I do.

16 Q. Was there any discussion about ghost political
17 schemes at this interview?

18 A. I don't remember if they -- probably. Yeah, I
19 think so, but it was a very brief thing. I'm not sure
20 they understood what a ghost thing was at the time. I
21 think it was more of trying to get me to explain the
22 nature of it.

23 Q. What's your understanding of what a ghost
24 political scheme is?

25 A. Well, I think the term got made up last year.

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1 I mean, it's fairly commonplace in Florida Politics both
2 for Republicans and Democrats to close down primaries by
3 getting either an NPA or sort of the lazy way to do it
4 would be to have someone file as a write-in. I think
5 they -- I'm sorry, no. The ghost party scheme is --
6 whatever they call that is you get someone to run in the
7 race to sort of siphon off votes in the general
8 election.

9 Q. And you pay them to do that?

10 A. I've never heard of that. I think that's a
11 crime. I mean, I think typically, when people run for
12 office, a lot of times you'll have people who are
13 realtors who are trying to get their name out. You'll
14 have people who are -- you know, want to run for office
15 later, and they're -- they just -- you know, they're
16 members of the local democratic executive committee or
17 republican executive committee or they don't like one of
18 the people. Yeah, there is all manners for it.

19 I don't think it's -- I mean, I think the legal
20 part is the paying them portion. I think people do this
21 all the time throughout the state of Florida and the
22 country. I don't think it -- it's not uncommon at all.
23 I think the notion -- I think what got them in trouble
24 here in South Florida, the Artiles case was there was an
25 allegation that money was paid to the guy.

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1 Q. Money was paid to a ghost political
2 candidate --

3 A. To a candidate. And again, from what I
4 understand, that's not been tried in court and I think
5 there is some serious questions about I think the guy's
6 business partners. But the allegation, from my
7 understanding, is that Mr. Artiles, Senator Artiles, had
8 paid some meaningful sum of money to whoever the
9 opponent was down there, and it was a slightly different
10 situation.

11 There was an incumbent democrat that went to
12 Harvard and would wear like rubber boots to the capitol
13 every day to like raise profile of global warming, and
14 he wound up losing his seat. His name was -- they
15 called him JJR. It was something something Rodriguez, I
16 want to say. And Jose Javier Rodriguez, they got
17 another guy by the name of Rodriguez to run as an
18 independent, and I don't really know what the rationale
19 is, but I guess they think they siphoned or stole those
20 votes away. The allegation is by paying this person to
21 do it then they somehow stole the votes. That is very
22 different from what I think happened up here, the
23 allegations that I read about. Just to be very clear, I
24 didn't have anything to do with either one of them and
25 never did. But --

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1 Q. And the two you're talking about are the Jason
2 Brodeur race and the Lee Constantine race, correct?

3 A. Correct -- no, not Lee Constantine. Jason --
4 there is -- there was an opponent with Lee Constantine.
5 That was the republican primary challenge.

6 Q. With Ben Paris?

7 A. That is not a ghost candidate. That is just an
8 opponent to the person. The ghost candidate -- and
9 again, I think ghost candidate is a bullshit term. I've
10 never heard of it before. It's just made up by the
11 Orlando Sentinel to try to make something sound more
12 dramatic than it really is. But the reality is there is
13 absolutely nothing illegal at all about filing someone
14 to run against another candidate for the purpose of
15 siphoning votes.

16 In these particular circumstances, again the
17 first one was Artiles, the second one was that that the
18 guy, Eric Foglesong, who they've gone after. They
19 claimed that he raised \$1,200 for the qualifying fee and
20 that he paid for it with I guess his own cash or -- and
21 then attributed to other people. I don't really
22 understand that because he could have just written a
23 check for 1,000 bucks and then one from his company and
24 there would be no news.

25 So it never really made a lot of sense to me,

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1 but I don't -- I think that was the nature of what that
2 was, and I think Ben Paris got in trouble because -- and
3 I think he was convicted of it, having his cousin be one
4 of the -- more or less agree to be one of the donors. I
5 don't know why you would do that because you don't have
6 to have multiple donors and Eric was already a donor.

7 But anyway, that was the allegation was that
8 Ben's cousin did something, and I think they charged the
9 girl -- the woman who I have never met as -- because I
10 think she was her own treasurer. But I think that is
11 the totality of it, and none of those have to do with
12 Lee Constantine.

13 Q. Do you have a specific date when this interview
14 with Mr. Todd Gee occurred in person?

15 A. No. I want to say it was like around April.
16 The number that pops into my head for no good reason
17 whatsoever is April 3, 2001 (sic), but I don't -- that
18 just jumped into my head, but it's around that time.

19 Q. April 3, 2021?

20 A. 2021, yeah I guess. Yeah. Yes -- you know,
21 well, it might have been February because we got the
22 subpoena right before or after New Years. I don't feel
23 like we waited three months, so it might have been
24 February but it was the early part of the year of that
25 year.

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1 Q. Okay. And in connection with this three-hour
2 interview, did they ask you at all about the July 15,
3 2017, gathering at your house?

4 A. Yes.

5 Q. And did the government also ask you about the
6 alleged interaction with "AB" at a hotel in Lake Mary,
7 Florida?

8 A. Yes and no. There was some confusion. When my
9 attorney first talked to them, they thought something
10 happened at the house. So Richard told me that the kind
11 of most extreme thing that I could do to demonstrate
12 that I really just didn't do this was go get a polygraph
13 test. So we went to the polygraph.

14 The FBI -- former FBI guy of 35 years came in
15 and sat down and administered it. And I think at first
16 it was like, Did something happen at the hotel or the
17 house? I think I said just nothing happened. So it was
18 sort of a blanket statement that nothing happened that
19 somebody -- it was an overall thing. When we got there,
20 there was some confusion on the government's side
21 whether something happened at the house or something
22 happened at a hotel room, and I just positively said I
23 have never met the woman.

24 Q. So it's your testimony that you have never met
25 "AB" --

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1 A. No, not "AB".

2 Q. Were there questions about other women other
3 than Ms. "B" and yourself at this three-hour meeting?

4 A. No.

5 Q. Was pretty much the sole focus of this meeting
6 Ms. "B"?

7 A. Really it was about Matt Gaetz and about -- at
8 this point in time, Joel was in, and again, he had
9 broken bail and burned your client's clothing and bags
10 and stuff, and he was stuck in jail. So they weren't
11 really focused on him. I think they kind of had him
12 dead to rights. Most of this was trying to figure out
13 if Matt Gaetz was there or, you know, whatever I knew
14 about that.

15 Q. And when you say if Matt Gaetz was there, if he
16 was at the July 15, 2017, gathering?

17 A. Yes.

18 Q. Did you feel like the questioning was focused
19 on you and your interaction with "AB" at this three-hour
20 meeting?

21 A. I did not. At the end of it, my attorney,
22 Richard, said like, You haven't asked my client if he's
23 broken any laws yet; and the guy said, All right, fine.
24 Did you ever have any relationship with "AB"? I said,
25 No, I did not. And then we handed them a copy of the

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1 polygraph and she said, Thank you for it.

2 Q. When did you feel like you were first a target
3 from the federal government's investigation with respect
4 to "AB" and yourself?

5 A. Again, I'm not an attorney, but I think target
6 actually has legal meaning. What they told us -- the
7 way it was described to me I think in the meeting itself
8 was that there are targets, subjects, and witnesses. If
9 you are on the street and you see a bank robbery, you're
10 a witness. If you're in the bank, you're probably a
11 subject. And if they think you robbed it, you're the
12 target.

13 And he said, in this kind of case, basically
14 nobody can be a pure witness because of the very nature
15 of whatever statutory -- whatever the language is of
16 that. But everyone's sort of -- you know, you're -- and
17 he said -- they told us we were on the witness side of
18 subject was the language I recall. And I don't remember
19 who told me that, but that was -- I think somebody
20 relayed that to Richard who relayed it to me.

21 Q. Going back to the open phone policy with
22 Rebekah, we talked about that previously, did
23 Ms. Dorworth have access to your text messages back in
24 the summer of 2017?

25 A. Yes.

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1 Q. Okay. And she could just freely look through
2 your phone and see your texts?

3 A. Correct.

4 Q. Okay. And that would include your text
5 messages with Matt Gaetz?

6 A. Yes.

7 Q. And that would include your text messages with
8 Joel Greenberg?

9 A. Yes.

10 Q. And that would include text messages with Joe
11 Ellicott?

12 A. Yeah. I didn't have a whole lot of texts
13 messages with Joe Ellicott; but, yeah. I texted those
14 other guys.

15 Q. Let's talk about Mr. Ellicott for a second.

16 A. Sure.

17 Q. When did you first meet Joe Ellicott?

18 A. Well, for me to give you a good answer to that
19 I'm going to have to tell you when I first met Joel and
20 then -- because they were tied together. I first met
21 Joel -- is that okay if I do that?

22 Q. That's okay.

23 A. Because I don't know the answer to it. I can
24 back into it if I do it this way.

25 Q. Yeah. So just tell me --

1 A. So Joel and I met after the primary election.
2 He had already won the tax collector primary. He had a
3 write-in, so he was going to win the general election.
4 I met him at a fundraiser for Donald Trump at Bobby
5 Dello-Russo's house on Markham Woods Road. At the time,
6 I represented the Orange County Tax Collector, Scott
7 Randolph, before the legislature in Tallahassee, and
8 Abby and Rebekah had gotten to know each other from
9 junior league and from the Heathrow mom's club.

10 So I got to know Joel shortly after that but
11 before he was in office, and then I think I met then Joe
12 who I generally considered to be Joel's best friend --
13 came and worked for him, so it would have been probably
14 sometime early in 2020 -- I'm sorry, 2017. Somewhere in
15 that, but I don't know exactly, but early on. Basically
16 what Joel would do is he had this sort of entourage that
17 would travel around, and Joe was part of it and Abby
18 would be part of it and then Abby's best friend, CK,
19 would be part of it and sort of a posse and Joe sort of
20 emerged on that front.

21 Q. What does CK stand for?

22 A. I think **REDACTED** **REDACTED**, if I'm not mistaken.
23 It was Abby's best friend who had an affair with Joel,
24 moved to Texas.

25 Q. How many times has Mr. Ellicott been to your

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1 home?

2 A. A couple maybe. I don't know. He's -- he's
3 been there. I don't remember - he's not been there all
4 an awful lot, but he's been there.

5 Q. And what were the occasions that brought
6 Mr. Ellicott to your home in Heathrow?

7 A. Probably just -- I have a little grill area out
8 back and a pool, and I like to call myself the grill
9 master. So I would make burgers and invite people over,
10 so probably for that sort of situation.

11 Q. Have you ever been to Mr. Ellicott's house?

12 A. I don't know where Joe Ellicott lives. It was
13 always a subject of great curiosity. I think he made
14 like 100,000 bucks a year and living with his mom, so I
15 really didn't understand that.

16 Q. Do you believe that you look like Mr. Ellicott?

17 A. I mean, I think we're both the same size, give
18 or take. Both of our weight can fluctuate. Similar
19 hair color. Both have facial hair. I mean, I don't
20 make a habit of comparing myself to other men
21 physically, but, I mean, if size, weight, hair color,
22 complexion, facial hair, I think there would be enough
23 there where if somebody was on the appropriate amount of
24 ecstasy they might get confused.

25 Q. Has anybody ever told you that you look like

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1 Mr. Ellicott?

2 A. No.

3 Q. Do you have reason to believe that this is a
4 case of mistaken identity where --

5 A. I do.

6 Q. -- "AB" mistook you for Mr. Ellicott?

7 A. Yes. What I don't know is if it was
8 intentional or whether it was accidental, but I do
9 believe that's what happened.

10 Q. Okay. And what facts and circumstances lead
11 you to believe that this is a case of mistaken identity?

12 A. Well, most of it consists of the fact that my
13 knowledge of what Joe and Joel's relationship was like.
14 They lived together, they were best friends, they would
15 frequently engage in sexual activities with women in the
16 presence of each other. Abby kicked Joel out -- I'm
17 sorry, kicked Joe out of the house because she thought
18 he was a bad influence on Joel. So when I read
19 Ms. "B"'s interrogatories that said that they were
20 chatting during the 15 minute sexual encounter, it
21 sounded very much like something that and Joe and Joel
22 would do and nothing at all like something I would do.
23 So that would be -- that would be the thought.

24 Q. And you said that Joel Greenberg and Joe
25 Ellicott lived together?

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1 A. I believe so, yeah, for years.

2 Q. And then you mentioned that Abby kicked
3 Mr. Ellicott out of the house.

4 Do you have a rough timeframe on that?

5 A. I don't. Here is what was my understanding of
6 it, and I don't think I ever had a timeframe, but it was
7 basically when they decided to get engaged. She said
8 that's fine, but Joe has got to move out. We have to
9 move in together and do our own thing. So I think --
10 Joel was already married when I met him, so it would
11 have predated any of that by me by a good bit. But my
12 understanding is basically, you know, all right, we're
13 going to do this, and we're going to get married, but
14 the first thing you have to do is get rid of your
15 friend.

16 Q. Has anybody ever told you that they believe
17 that this is a case of mistaken identity where "AB"
18 mistook you for Mr. Ellicott?

19 A. I don't -- again, I have never met "AB" before
20 of this I am certain. I have had a chance to review the
21 internet, look at her, see who she was. I have never
22 seen that person.

23 Q. And you sat through her entire deposition?

24 A. Sat through her entire deposition, although she
25 looked very different in that deposition than she did on

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1 the internet. She had a cardigan sweater on, and it was
2 very different from what you would find on the worldwide
3 web. But I have never seen -- never met that person.

4 Q. Do you have a prenuptial agreement with
5 Ms. Dorworth?

6 A. No.

7 Q. Can you briefly outline for me your educational
8 background?

9 A. Sure. Graduated from -- well, I'll go back all
10 the way to the beginning. Kindergarten through eighth
11 grade at Lake Highland, high school at Colonial High
12 School, University of Florida, Duke. I got my MBA at
13 Duke.

14 Q. And when did you graduate the University of
15 Florida?

16 A. 1998, August.

17 Q. And what was the degree that you obtained
18 from --

19 A. Political science.

20 Q. And then you went to Duke?

21 A. I did.

22 Q. And what did you study at Duke?

23 A. Business.

24 Q. What year did you graduate?

25 A. 2006 -- no. 2006.

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1 Q. So Florida, graduated in 1998; Duke, 2006?

2 A. Yes.

3 Q. Any other education beyond that?

4 A. No.

5 Q. Do you hold any professional licenses?

6 A. No.

7 Q. Any special certifications?

8 A. No.

9 Q. Are you a registered lobbyist?

10 A. Right now, no.

11 Q. When is the last time you were a registered
12 lobbyist?

13 A. I guess the moment I quit my job in 2000 --
14 2021, yeah.

15 Q. April of 2021?

16 A. Yeah, when the New York Times story broke.

17 Q. And you said that was when you quit your job
18 from Ballard Partners?

19 A. Well, I mean, we represented the Major League
20 Baseball, the PGA and with these allegations out there,
21 even the allegations of the third party which was
22 actually what they wrote about, just you go to the
23 commissioner of Major League Baseball and say that you
24 know your lobbyist is under investigation for, you know,
25 participating in a third party? They'd say, well, get

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1 rid of that firm. So I wasn't going to do that to my
2 coworkers, and I stepped away but it would have been
3 necessary if I hadn't done that, if I had fought it, it
4 would have happened sooner or later. I would have had
5 to quit. I would have been pushed out.

6 Q. And when you say the third party, you're
7 referring to the ghost political allegations?

8 A. Yeah, whatever you call it. The ghost party,
9 yes. That was what actually made the New York Times for
10 Katie Benner.

11 Q. And did anything about "AB" make the New York
12 Times around that timeframe in April of 2017 --

13 A. Well, I threatened to sue everybody involved if
14 they ever mentioned it, so I did not. We were able to
15 keep it back. I spent five or six hours a day on the
16 phone with basically -- everybody -- I can't even
17 remember the names. It's been years. But it is the
18 Wall Street Journal, Washington Post, New York Times
19 every single day because of the interest around Gaetz.

20 Q. So back in April of 2021, your understanding is
21 the ghost political allegations got out and were
22 published in the New York Times but not the AB and
23 yourself allegations?

24 A. Well, I mean, I was in that article, but Katie
25 Benner who was the Pulitzer Prize winning person said,

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1 you know, We've gotten -- we've been told more or less
2 by somebody allied with the Greenbergs. She did not
3 make any pretense at this gate from the Department of
4 Justice at all, and she was pretty clear that this
5 information was being pushed out by you guys and
6 suggested that I was there. I said I was not there. I
7 have never met the woman, and I will litigate like hell
8 if anyone says I have. She said, Well, I have to put
9 something in here. What if I put this about the third
10 party? I said, It's not true either, but, you know,
11 it's better than the other one. I can't control what
12 the New York Times writes. If anyone could do that,
13 they would make a lot of money.

14 Q. And that third party issue was the Jason
15 Brodeur election with Justin --

16 A. I believe the exact suggestion was that Joel
17 said that he observed a conversation between me and Matt
18 Gaetz about the Jason Brodeur third-party race.

19 Q. And that would have been Patricia Sigman as a
20 democratic candidate and then Iannotti ran as an
21 independent or nonparty affiliation?

22 A. Yeah. I mean, at the time, I was a very
23 controversial figure in Seminole County because of River
24 Cross. So, you know, I probably would have been
25 involved in something like finding a candidate to do

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1 that, but Jason Brodeur came to me and said, Listen, you
2 know, with what you've got going on, if anyone tries to
3 drag you into this, do us all a favor and steer far away
4 from it. I said, That sounds like a great plan, and
5 never thought about it again. I don't think -- no, it's
6 Jason was not interested in that kind of game and didn't
7 think it was necessary to win. It turned out he was
8 right. He won by a larger margin.

9 Q. And Jason, you're friends with Jason, correct?

10 A. Yes. Very close.

11 Q. How long have you been friends?

12 A. Since about January 1995.

13 Q. And the night before Rebekah's deposition, you
14 had gone out with Mr. Brodeur, correct?

15 A. Yes.

16 Q. And you also went out with somebody named Clay;
17 is that correct?

18 A. Craig Sweger. I think we'll have that changed.
19 I have a fraternity brother named Clay Sweger, and I met
20 with Craig Sweger. My wife heard me say Craig Sweger,
21 but that was my fraternity brother. So his name was
22 Craig Sweger.

23 Q. So you went out with Jason and Craig, anybody
24 else?

25 A. No.

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1 Q. And where did you go then?

2 A. Grafton. Grafton Street Pub up in Lake Mary.

3 Q. Is that the old Liam Fitzpatrick's?

4 A. It is.

5 Q. Is it the same owners or different?

6 A. The same owners.

7 Q. They just rebranded?

8 A. They bought the Applebee's, spent a bunch of
9 money rebranding it because they were paying like 35,000
10 a month in rent at their old location.

11 Q. And how long did you hang out with Jason and
12 Craig?

13 A. It was short. They had a meeting, and Craig is
14 just a friend of mine. He was is an old Clear Channel
15 billboard group for like 19 years, and I just hadn't
16 seen him in awhile. So I went and had a drink or two
17 with him and came back. I wasn't feeling real well, so
18 it wasn't like a real heavy night as you can imagine.

19 Q. Can you give me a rough estimate? Like an
20 hour?

21 A. Yeah, probably an hour.

22 Q. Are you currently working?

23 A. I have some clients. I mean, I have two
24 consulting clients.

25 Q. Okay. And is it a lobbyist relationship?

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1 A. More strategic consulting. I anticipate this
2 session I will probably delve back into the official
3 process of lobbying, but lobbying is -- it's -- many
4 people don't really understand what it is. It is
5 probably most simply articulated as the seeking
6 grievance from your government for money, but it's -- it
7 speaks very specifically to asking for votes and
8 representing people, and I have as of yet not done that
9 yet, but I anticipate that will become part of what I do
10 in the near future.

11 Q. In the summer of 2017, you were working at
12 Ballard Partners, correct?

13 A. Yes, sir.

14 Q. And what was your job title there?

15 A. I think it was maybe the managing director of
16 the Central Florida office. I don't know. I'm not a
17 big title guy. I mean, you work there. You were -- I
18 think managing director would be the title, but I don't
19 exactly know.

20 Q. Was that office in Orlando?

21 A. We never -- I mean he always wanted an office
22 down here, but we never found one that we did. So it
23 was just me and then for awhile it was a guy named
24 Richard Anderson and then another guy named Don Payton
25 who specialized in the college stuff. And we just had

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1 very different things. So we had an office in
2 Tallahassee, and it's not uncommon -- like I think there
3 was an office in Miami, there is an office in Fort
4 Lauderdale, an office in Tampa, but we just -- to me
5 managing an office did not seem like a particularly good
6 use of time so we didn't have a local office but we had
7 one in Tallahassee.

8 Q. How many people reported to you when you were
9 at Ballard Partners?

10 A. I mean, it didn't really work that way.
11 Ballard Partners -- Ballard owns 100 percent of Ballard.

12 Q. And that's Brian Ballard?

13 A. That's Brian Ballard. He owns 100 percent of
14 Ballard Partners. He is the president of Ballard
15 Partners and everybody works for Brian. But, I mean,
16 obviously there is some sort of pecking order. There is
17 people who specialize in transportation stuff. So to
18 answer the question is zero direct reports, but, I mean,
19 again, I was considered somebody in that firm who was --
20 you know, I had big clients. I handled large issues. I
21 mean, we would -- I was sent to do a lot of jobs.

22 Q. What kind of job duties did you have at
23 Ballard?

24 A. I mean, you -- lobbying. Lobbying the
25 legislative branch. Lobbying the Florida House.

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1 Lobbying the Florida Senate. Lobbying the governor's
2 office. Lobbying the chief financial officer, and
3 lobbying the attorney general in some circumstances
4 probably.

5 And then there is all the agencies of
6 government. There's the DPR. There is department of --
7 office of insurance regulation. There is AHCA. There
8 is Department of Health which that was medical
9 marijuana, and I dealt with all of them. I mean, they
10 were -- like we had certain people that were really,
11 really dialed in on transportation, but I'd still help
12 out because I was good on that. So basically a jack of
13 all trades kind of stuff. So in terms of the management
14 structure, it all went to Brian.

15 Q. Does Ballard Partners, are they in the business
16 of working on pardons?

17 A. Yes.

18 Q. Have you ever done anything like that, worked
19 on a pardon for --

20 A. I have not. I have never done federal lobbying
21 work.

22 Q. Do they do federal lobbying for pardons and
23 state lobbying for pardons, both?

24 A. Oh, yes.

25 Q. The governor and the president?

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1 A. Yes.

2 Q. Who's the --

3 A. Well, what you said is not exactly right. In
4 Florida it's a cabinet. You have to go -- like the
5 president can just pardon whoever they want. There is a
6 bunch of laws they put around that, and I think under
7 Trump there was a lot of scrutiny of that which kind of
8 shut the whole process down. But that's a very large
9 part of what a lot of federal practices will do. I
10 don't have any firsthand knowledge of what we do.

11 If you said, like, give me an example of who we
12 got pardoned, I don't know, but I know that that was
13 very much something that was discussed. Brian did not
14 like pardon work because he thought it just was the kind
15 of work that even if you make a lot of money doing it
16 you bring scrutiny on yourself because every time the
17 president pardons there tends to be a very big level of
18 interest and curiosity as to why and if it shows up in
19 politics. So I think on a few occasions I had people
20 make general inquiries. I ran it up to Brian who was
21 not particularly enthused about it, but it is was
22 definitely something that the firm did.

23 Q. Who was the point person at Ballard for federal
24 pardons?

25 A. Probably Brian and Pam Bondi.

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1 Q. Pam Bondi and what, Brad?

2 A. Brian.

3 Q. Brian Ballard?

4 A. Brian Ballard and Pam Bondi. And again, I
5 assume that. I don't know. I don't know who -- if
6 there was other people that were involved in that.
7 Again, I was never a federal lobbyist. It is a very
8 different sandbox.

9 Q. Have you ever discussed obtaining a pardon for
10 Joel Greenberg with anybody at Brian Partners?

11 A. No. He asked me to, but I politely refused.

12 Q. When did Mr. Greenberg first ask you to work on
13 getting him a pardon?

14 A. So I don't -- it was -- Rebekah went to the
15 Marriott. Joel threatened her. I told Joe I wanted to
16 meet him. I said, If you ever threaten my wife again,
17 you and I have -- it's going to be a real problem, and
18 he basically -- we were at Another Broken Egg. And at
19 the time, I was not pleased with Joel because he had --
20 when he did that stuff to Brian Beute which I find to be
21 utterly reprehensible when he created the Facebook
22 account and then mailed the letter to Trinity Prep.

23 He put on the Facebook ad that Brian Beute was
24 a segregationist, and that was a very clear attempt and
25 it worked because it actually pursued Beute's attorneys

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1 that I was the one that was doing it. But because he
2 said that, I was suing Seminole County for a fair
3 housing act segregative effect lawsuit. So I was really
4 pissed off at Joel for putting my name -- putting
5 segregation in there, to do it in the first place.

6 So when I saw him, I was already pissed at him.
7 And he had just threaten my wife, and so I was even more
8 pissed at him. And when I -- when we got to breakfast
9 there, he was just -- he was crazy, and he was -- he had
10 only been charged with two crimes, just started
11 blabbering on on how they know about the girls. And I
12 said, Joel, I don't know what you're talking about. I
13 think I used the F word. I said, I don't know what the
14 F you're talking about.

15 He goes, We're going -- I'm going to get
16 charged. I need a pardon. I mean, he was -- at this
17 moment in time, Joel truly believed that he thought that
18 he could stop all of the horrible things that happened
19 to him by getting pardoned. First he thought it was
20 going to be Gaetz. I broke it to him, I said, Matt is
21 not going to help you try to get a pardon. If Matt
22 wanted to help you get a pardon, he could not help you
23 get a pardon.

24 Joel did not believe that. Joel was -- he
25 said, No, Trump loves him like a son. He can do it. I

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1 said -- then he pointed out -- Joel pointed out that
2 Roger Stone had been pardoned. I said, Okay, Joel let's
3 take a second and talk about that because Roger Stone
4 and Donald Trump have known each other and worked with
5 each other for 40 or 50 years. The -- they have worked
6 together on projects.

7 When Roger Stone was investigated by the
8 federal government it was because there was -- it was
9 part of an investigation that -- I think it was that
10 Ukraine was influencing elections. Roger wound up going
11 to prison for like threatening a federal judge's dog's
12 life and I think saying some things, but even though
13 Trump let him be tried, let him be convicted, let him go
14 through an appeal, spend an absolute fortune along the
15 process. And then the day he was supposed to go into
16 jail, he commuted his sentence.

17 I said to Joel, Now, Joel, Donald Trump doesn't
18 know who you are. You are not being investigated for
19 some BS claims of Ukraine trying to influence the
20 election for Donald Trump for president. This is you
21 doing dumb shit, And I don't know how you think this is
22 going to somehow get bailed out. And I just told him, I
23 said, like, you know -- and he -- I do think he got the
24 Stone analogy that the fact that Trump had made Roger
25 Stone go through all those things before commuting his

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1 sentence, you know, it seemed to resonate.

2 So then he immediately turned over to Ballard
3 Partners and said, What would it cost to get a pardon?
4 And I said, I am -- I said very clearly, I said, you
5 know, If this was about the other stuff which was you
6 doing the sending a note to a private school suggesting
7 that a music teacher was having sex with a male underage
8 classmate, I could not get you pardoned for that. There
9 is just certain things.

10 You see -- I think in that world, you sort of
11 think like white collared crimes, didn't pay their taxes
12 or had some -- they didn't file some five percent thing
13 with the SEC. You see those people get a lot of
14 pardons. You don't see a lot of people are out there
15 for stalking and who falsified other people's
16 identifications.

17 I said, So, Joel, if that was the reality, I
18 couldn't do it for you. It would be beyond what Ballard
19 Partners or the firm could do. If you're telling me
20 that you have numerous women that are going to come out
21 and say that you were paying them or trafficking them or
22 anything -- and I didn't know about "AB" being underage.
23 It's all new to me at this point in time. I didn't know
24 who she was, and a few weeks later he threatened me via
25 text message on that stuff. But I told him, I said --

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1 he threw out the number, he said his parents would pay
2 \$5 million if he could get a pardon.

3 Q. And this was at the Broken Egg?

4 A. It was at the Broken Egg. I said --

5 Q. When was that meeting at the Broken Egg?

6 A. Find out whenever that Marriott meeting was and
7 it was probably three or four days after that I bet.

8 Q. So the Marriott meeting was in July.

9 A. Yeah. Again, I'm sorry, I don't have that
10 calendar in front of me. If you say so, but, I mean, it
11 was -- I think it was in August that they started
12 sending me the text claiming that his attorney told him
13 that everybody would have to get lawyered up. So that
14 was after Another Broken Egg.

15 Q. Do you recall who paid for the meal at the
16 Broken Egg?

17 A. I do not.

18 Q. Whether there would be a receipt or anything
19 like that?

20 A. I don't know. I don't think Joel had any
21 money. He needed a ride home. I told him I couldn't be
22 friends with him anymore because of the allegations that
23 were coming forward and the idea that you trafficked a
24 child. That I had an 18 year old -- I had a daughter at
25 the time who was -- yeah, I think she was 18 in 2000 --

1 well, she was born in 2001, so she would have been 19 or
2 20. I said, The fact that I had a daughter who is about
3 the same age, I cannot -- now, you've seen me. I take
4 it very seriously. I cannot be known as being someone
5 who hung around a dude that did the shit that you did,
6 Joel. He said, I understand, but can I have a ride
7 home? I don't have a car. So I drove him home, and
8 that was the last time that I saw Joel.

9 Q. And when is the first time that you heard the
10 name "AB"?

11 A. Via -- well, I think via the text message where
12 he -- the WhatsApp or whatever he said, Everyone needs a
13 lawyer. And I said, What? And he said, They have our
14 texts. Who? **REDACTED** 99 or something. I have never
15 been on those websites. I have never -- I have never
16 been on a social media dating site ever. I just missed
17 that window when I was elected office. So I wasn't. If
18 I had been, I probably wouldn't have been on it anyway,
19 but I didn't know **REDACTED** 99 was. I didn't know who
20 "AB" was. I sure as hell didn't know she was underage
21 when he had this issue with her.

22 Q. When is the first time that you learned that
23 "AB" was underage in the summer of 2017?

24 A. I don't know. Probably throughout the course
25 of the investigation here. My first question was who

1 are you talking about? Like I don't know who "AB" is.

2 Q. So your testimony is that the first time you
3 heard the name "AB" is when Greenberg reached out to you
4 and referenced her Seeking Arrangements name, V[REDACTED]
5 [REDACTED]?

6 A. Well, the name made -- there is a text message.
7 He sent a picture that is our part of our discovery here
8 that says something like she -- I think she had just
9 become like a -- some porn star. I don't know here.

10 Q. And that's, [REDACTED] destined for greatness; and
11 you responded, LOL?

12 A. Yeah. It was just a typical response for me.
13 I don't know what I'm supposed to say to, [REDACTED]
14 destined for greatness. I have no cognitive
15 counterpoint to that that would be better than LOL. He
16 was -- I mean, I think Joel and Abby -- I'm sorry, I
17 think just Joel and "AB", they hung out for many years.
18 I think he continued to be friends with her, I just
19 never met her.

20 Q. You stopped working at Ballard Partners on
21 Friday, April 9, 2021, correct?

22 A. Sounds right.

23 (Exhibit 96 was marked for identification.)

24 BY MR. PERKINS:

25 Q. And I'm going to put the severance agreement up

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1 next on the screen here. All right, the next exhibit
2 will be 96. This is the severance agreement and general
3 release between yourself and Ballard.

4 Do you see that up on the screen?

5 A. I do.

6 Q. Okay. And this document was executed by Brian
7 Ballard and yourself on April 9, 2021; is that correct?

8 A. It looks like it.

9 Q. Where did you physically execute this? Where
10 were you when you did it?

11 A. My house.

12 Q. If we go to page three, do you see the
13 voluntary resignation paragraph there?

14 A. Yeah.

15 Q. It states, In consideration of the mutual
16 promises of the employee and employer contained in this
17 agreement, the parties agree that employee's personnel
18 file will reflect his voluntary resignation effective
19 April 9, 2021 --

20 A. Correct.

21 Q. Did I read that correctly?

22 A. Yes.

23 Q. Was your resignation voluntary?

24 A. I mean, define voluntary. I mean, it's -- I
25 have been around for too long. I have been part of

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1 crisis communication for the better part of 20 years in
2 my life, and I know that there's certain things that you
3 can beat back and certain things you can't beat back.
4 And my instinct was very quickly on this one that if
5 I -- and by the way, Brian was willing to let me stay
6 and fight for a little bit. But we both had been
7 through this sort of thing before.

8 We have seen just through politics -- I mean,
9 obviously there is no quite perfect comparison to this,
10 but we have just seen too many times that once the press
11 gets ahold of these things, they become a piranha like
12 feeding frenzy. I think that was done very
13 intentionally, and I think the leak of the information
14 was definitely done in an attempt to get time off the
15 jail sentence from -- for Joel Greenberg. We knew that.

16 And so I think that the -- you know, I think
17 that they were going to keep the pushing the press, so I
18 made a resignation because I think otherwise what would
19 have happened is I would not have had the choice of a
20 voluntary resignation. So on a scale of how voluntary
21 it was, I would say it was not terribly voluntary. It
22 was done -- it was an option that I had at that moment
23 in time to move on and to -- you know, to attempt to
24 fight these things but not to do it in a place where one
25 day we start using big clients and other people in the

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1 firm get upset because we're getting dragged through
2 things and we start to have staff and morale problems.

3 I just saw that happening, and I said, Listen,
4 if we do this now, that's that. I didn't want to. I
5 loved that job. I love the people there, everyone of
6 them. It was a wonderful job, and I think this is a
7 real horrible thing that happened.

8 Q. Who brought up the idea of you resigning? Was
9 it you or Mr. Ballard?

10 A. That sort of thing, I mean, we were grownups.
11 We were professionals. You know, he's got a lot of
12 employees. I have managed things. We're not -- when
13 you read -- first of all, I'm tied to Matt Gaetz in the
14 first place. Second of all, when you read the Gaetz and
15 the Greenberg stuff and then you see allegations that
16 I'm under investigation for some ridiculous third party
17 stuff that I never had anything to do with.

18 I mean, it was just -- it was all Joel trying
19 to -- because at this point in time, they knew the only
20 way he was going to get out of jail was by getting as
21 many people convicted as possible. And I -- the story
22 that came out was -- and the fact that I was spending
23 several hours a day on the phone told me that this was
24 not going away. So voluntary was the way I could do it,
25 and I don't know that we ever -- I don't remember me

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1 saying, What about me resigning, Brian, or Brian saying,
2 What about you resigning? But it would just be the sort
3 of thing -- if a plane crashed and it was you and a
4 business partner saying, well, should we get off the
5 plane? I mean, that was sort of more the conversation.
6 I wasn't saying, Oh, should we stay we on the plane? At
7 that moment in time, we knew that this was coming, and I
8 pretty much had to go.

9 Q. Did Brian ask you to leave?

10 A. Brian was very anguished by this. Brian was a
11 good friend, but this was -- I was very happy. I was
12 good at my job. I was successful at my job. Things
13 were going great. The only reason anything went wrong
14 was because Joel Greenberg went and burned all of your
15 client's stuff, and then Andy Greenberg threatened --
16 again, this is so weird because we were there. I mean,
17 Rebekah was friends with Abby. And after burning all of
18 Abby's bags and burning her clothes except for her
19 workout clothes and maternity clothes.

20 And after having a thing where he had to be
21 like literally lured out where they did a hostage
22 response thing, after all that, Abby talked to Rebekah
23 and relayed the information that Andy was still trying
24 to get Joel out of jail. And at the time, Sue said,
25 Well, if you do that, I'm taking Abby and I'm taking the

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1 kids and I'm moving to the California because this --
2 our son is a lunatic.

3 And but that did not stop them from then going
4 to plan B which was to make up a bunch of bona fide lies
5 trying to implicate other people in the things that Joel
6 had done wrong for the purpose of getting him off. And
7 I don't have to question that because Fritz Scheller
8 over there, he actually went to the newspaper and said
9 it. So, I mean -- he said, We want more time off for
10 Joel in exchange for all this testimony. So he knew
11 what was going on.

12 Q. When did you first contemplate resigning from
13 Ballard Partners?

14 A. When I saw the New York Times story.

15 Q. And that story came out on what day?

16 A. I don't remember, man. A couple days before.

17 Q. Ms. Benner had texted you on April 8th.

18 A. Yeah, I think that was about that time. This
19 all happened pretty quickly.

20 Q. Did you retain outside counsel to review the
21 severance agreement?

22 A. No.

23 Q. Do you know if Ballard had outside counsel?

24 A. Yes.

25 Q. Do you know who they used to facilitate the

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1 severance agreement?

2 A. Tom Panza probably if I had to bet.

3 Q. How do you spell that last name?

4 A. P-A-N-Z-A.

5 Q. Out of Tallahassee?

6 A. Broward and then Tallahassee. He's a -- I
7 think Mr. Panza kind of looked at this for me too. I
8 had other lawyers who were doing other stuff at Lowndes
9 Drosdick. I said, Does this look good to you? And they
10 said it was -- it was fine.

11 Q. Who would you have reached out to at Lowndes?

12 A. Either Rebekah Rhoden or Tara Tedrow. I think
13 both of them -- I think I texted them both and said,
14 Does this look okay?

15 Q. When did you first get your hands on the
16 severance agreement to look at?

17 A. I don't -- it all happened very quickly.
18 Whatever those days were, like we -- basically the story
19 came out, Brian and I said, Hey, let's sleep on this.
20 You know, like, let's talk tomorrow morning because, you
21 know, a lot of information to process. The next
22 morning, he called me and asked what I was thinking. I
23 told him what I was thinking.

24 He took about two seconds and he said, All
25 right, let's do it. I think it was a very quick

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1 process. I think later that day I got a draft of this.
2 I think they had been used for other ones. I think this
3 was like kind of a standard document. I didn't have to
4 make any edits. Nothing was objectionable. I mean,
5 it's very -- I think the one change I made was -- there
6 was language in there originally that said the
7 non-disparagement thing.

8 I said, I have nothing bad to say about Ballard
9 Partners, and we love you. So I think the language was
10 tweaked a bit to say that -- I mean, I have never said a
11 bad word about Ballard Partners, and I don't think
12 they've ever said about word about me. If they have, I
13 have never heard it. But we basically made it so that
14 we could make public comments about each other because
15 when you have a non-disparagement, non-discussion that
16 you kind of make it sound like it was a more hostile
17 thing.

18 Q. Was Ballard Partners getting contacted by the
19 press before you resigned?

20 A. I'm sure. I don't know that, but I'm sure.

21 Q. Do you know for sure if they were?

22 A. I would wager large sums of money that they
23 had, but I don't know. I mean, the press would call and
24 say -- Yeah, I'm sure Brian got phone calls about it.

25 Q. But you can't state with certainty that he did?

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1 A. I remember him referencing, he was, We're
2 getting calls, but what he never did was like log the
3 calls and be, I have heard from so and so.

4 Q. Do you know what the calls were about in that
5 regard?

6 A. Probably just checking in, like how's
7 everything going? I mean, it's kind of a big thing to
8 show up in the New York Times that you're -- one of your
9 guys is being dragged into this sort of stuff.

10 Q. And that would be the ghost political scheme?

11 A. Yes.

12 Q. Do you know if Ballard ever got inquiries from
13 legal authorities regarding you, law enforcement
14 contacted them, the federal or state authorities?

15 A. I think they subpoenaed them. I don't know. I
16 don't know the answer to that question. No, I don't.
17 It's a very official unit. I mean, I don't talk to
18 Brian about it. There is a managing director for the
19 Tallahassee office. Every time something has happened,
20 I always talk to her. So, you know, there is -- I don't
21 call Brian to discuss this. It's all done, and it's
22 been years since I had any conversation with her. I
23 mean, I see her in like a restaurant, but I mean about
24 this.

25 Q. One more exhibit and then we'll take a quick

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1 break here. All right. This will be Exhibit 97, and
2 this is an email from a Shanna Crawley; is that right?

3 A. Shanna Kaye Crawley.

4 (Exhibit 97 was marked for identification.)

5 BY MR. PERKINS:

6 Q. Shanna Kaye Crawley at Ballard; is that right?

7 A. Yes.

8 Q. What was her role there?

9 A. Shanna Kaye is Brian's personal assistant and
10 sort of the nerve center of the firm. She's the one who
11 does all the scheduling, planning. If you need a
12 contract, she does it. She's an incredible woman.

13 Q. And it looks like Ms. Crawley is sending you a
14 draft of the general release and severance agreement
15 here?

16 A. Yeah. I don't know who Catherine Tetter is,
17 but...

18 Q. Is this the first time you got a copy of the
19 general release and severance agreement?

20 A. I think so, but, I mean -- yeah, this was a
21 very compacted period of time. Probably. I might have
22 seen one before like when somebody else left, but I...

23 Q. And how would you have seen one before?

24 A. I don't think he ever signed it, but when -- we
25 had a guy from Central Florida who was in our office who

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1 wound up getting in a -- he got arrested for a hit and
2 run.

3 Q. Was that Anderson?

4 A. Yeah. And when he left the firm, I think there
5 was some discussion about whether to do a severance and
6 general release, but I think he just said, I'm good.
7 And there was -- so I think I might have seen a draft of
8 this sort of thing back then, but I don't know for sure.
9 I know we talked about it. I don't remember actually
10 seeing the document itself.

11 Q. When did Mr. Anderson resign because of that
12 hit and run?

13 A. Whenever it took place.

14 Q. So you recall seeing some type of severance
15 agreement and general release at that time?

16 A. I think -- what happened was, out of nowhere
17 one day, I land in -- I was on an airplane somewhere,
18 and Richard called me and said, Hey, I've got some bad
19 news. And I said, What? He said, I'm getting arrested.
20 I did this; and I said, Excuse me what? There had been
21 an accident I think maybe a year before, and they had
22 actually come and asked me and I was like, I don't know
23 what -- I have no idea.

24 But -- so it was all very sudden. Like he
25 literally went and turned himself in, and I think that

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1 night I had some conversation with Brian. I said, Do
2 you want me to get a release or anything? He said, Do
3 you think we need one? I said, I don't know. Do you
4 want one? I mean, I'm sure Richard would sign one. I
5 don't think there's -- there wasn't going to be any
6 payments or anything like it would just be like to sort
7 of tidy this up. I think it would up being don't worry
8 about it. So we never -- didn't act on it, but I do
9 think there was some discussion of that at least at some
10 point. I don't that it's relevant to anything but...

11 Q. How did you negotiate the \$1.2 million
12 severance?

13 A. Well, I mean, part of it is I was going to make
14 a lot more than that, but I was going to have to go do
15 work. I was going to have to go and actually lobby and
16 everything else, and I didn't think it was fair to say
17 that Ballard should just front the totality of
18 everything. So it was sort of -- it was just a round
19 number. It was certainly a decrease from where we had
20 been; but, you know, again, at the time I hoped this
21 thing would go a lot faster than it did. Just time
22 tends to drag out.

23 MR. PERKINS: All right. Let's take a quick
24 break. It's 10:16.

25 THE VIDEOGRAPHER: If there are no objections,

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1 going off record. The approximate time, 10:16 a.m.

2 (A break was had.)

3 THE VIDEOGRAPHER: On record with media unit
4 two. The approximate time is 10:29 a.m.

5 MR. ANDRADE: All right. So before we go back
6 into questions, the parties were discussing timing
7 and I guess air traffic control on the deposition
8 timeline for today and tomorrow. I noted that
9 plaintiff's counsel and plaintiff did not object to
10 the setting of -- scheduling of this deposition over
11 the course of two days with the hope and
12 understanding that this deposition would not run
13 significantly over, you know, seven hours today and
14 approximately four, four and a half hours tomorrow.
15 It's just our sincere hope that the questioning can
16 be completed by then and that the counsel that has
17 already asked questions coordinates to avoid a run
18 of time in this deposition.

19 MR. WERMUTH: I'll just note that there's a
20 raffle of defendants in this case, each of whom are
21 separately represented by counsel who each have a
22 right to question the plaintiff on the extensive
23 complaints that he has asserted -- he has alleged in
24 this case and verified in this case. And so I
25 think, you know, obviously we'll do our best to not

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1 duplicate each other; but at the same time, we need
2 to get our questioning in. And so I expect that
3 we'll be able to do that to defend ourselves.

4 MR. ANDRADE: And not as a retort, but I'll
5 just note that I don't see a citation or a reference
6 to any exception related to the length of a
7 complaint in Federal Rule of Civil Procedure 30.
8 And with that, I don't want to waste any more time.

9 BY MR. PERKINS:

10 Q. All right. Back on the record. Ready
11 Mr. Dorworth?

12 A. Yes.

13 Q. All good? All right --

14 A. I'd just point out that my microphone is muted
15 on this, and I don't know if that matters.

16 Q. We have these in the middle.

17 A. Okay. Got it.

18 Q. All right. Back on the record, we were talking
19 about Exhibit 97 which is this email from Ms. Crawley to
20 yourself dated April 9, 2021, at 4:53 p.m. Ms. Crawley
21 sent you a draft of the general release and severance
22 agreement. In response I guess you run this by some
23 attorneys at Lowndes.

24 Did you have any changes to this agreement?

25 A. The only -- again, it was a boilerplate

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1 document. The only change that I wanted to was to the
2 positive had to do the with non-disparaging language. I
3 don't remember exactly what it was, but it was basically
4 just -- I think the language before said something to
5 the effect of we will not speak of each other. Well, I
6 don't -- I'm leaving here to avoid that.

7 I don't want to be separate -- you know, I
8 don't want there to be like a bright line and Brian
9 agreed with that and the language that is reflected here
10 is -- I think I have read it today, but it should
11 basically say there is nothing that stops me from saying
12 nice things about them or them from saying nice things
13 about me.

14 Q. So in the initial draft, there was a voluntary
15 resignation provision, and that provision stayed in the
16 final draft, correct?

17 A. I don't remember anything to do with the edits.
18 I don't -- I don't -- I think this is very boilerplate.
19 I recall very minimal changes to it. I do not remember
20 whether voluntary resignation was there or not. I --
21 that's beyond me. I think -- well, if this is the one
22 that she sent you --

23 Q. This was the one that was sent at 4:53 --

24 A. There was no negotiation I think before that,
25 and it's possible the one I actually executed has

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1 language different than that one if this is her email.

2 So we might have made the change after that.

3 (Exhibit 98 was marked for identification.)

4 BY MR. PERKINS:

5 Q. All right. The next exhibit will be 98, and
6 this is an email from Ms. Crawley again to yourself
7 approximately an hour later.

8 Do you see that up on the screen?

9 A. Is it different from the last one?

10 Q. Yeah. The last one was 4:53.

11 Do you recall that?

12 A. Yeah.

13 Q. And this one's 5:54.

14 A. That might be the difference in the -- whatever
15 the -- I don't remember what the language was, but it
16 was basically a non-disparagement, but I think the
17 change might be in there.

18 Q. Okay. And there is still -- the voluntary
19 resignation still remains in this one?

20 A. Yes.

21 Q. You didn't attempt to take that out, correct?

22 A. Well, I mean, why would I take that out? It
23 is -- I was confronted with I believe a defamatory,
24 slanderous news story that threatened to drag me and my
25 lobbying firm into it which would then do damage to my

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1 coworkers. And so recognizing the damage that had been
2 done to me, I made the decision to not inflict damage on
3 my coworkers by stepping away. I don't -- you say
4 voluntary resignation. I wasn't like to the hell with
5 it I'm done here, free me. It was that there was a
6 situation that was sort of around us, and I was
7 responding to that situation.

8 And so in that sense, it was a voluntary
9 resignation as far as I was not fired and driven out of
10 the building with my stuff; but, I mean, the reality was
11 there was very bad things that were being said that were
12 going to drag my reputation and the firm through the
13 mud, and we submitted this versus having to take some --
14 me being fired or anything. And that's all there is too
15 it.

16 Q. You had mentioned before that Brian and you
17 discussed staying to fight it for a little bit.

18 Did you have those discussions before you
19 resigned on April 8th?

20 A. I did.

21 Q. And what when were those discussions?

22 A. Well, to be clear, what I told you earlier was
23 that I said, Why don't we sleep on this and talk about
24 it tomorrow morning? So that night, I just made a flow
25 pad of how things were, and the nature of lobbying is a

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1 business. I mean, it's cutthroat. And with this out
2 there, people would use it to try to -- you know, to try
3 to affect Brian Ballard's firm and my coworkers there.
4 And, you know, it's not fair that I had to go, but it
5 was a reality that the -- I think there was actually a
6 quote that was in Newsweek or something that I said it's
7 not fair to my coworkers for me to do this. It's not
8 fair for the -- if we have a wealthy family like the
9 Greenbergs out there trying to buy down time for their
10 son and they're willing to lie and do all sorts of
11 things to do that, it's not fair to my coworkers that I
12 subject them to that degree of psychosis which I have
13 become quite familiar with.

14 Q. You said you used a flow pad?

15 A. Like a notepad.

16 Q. Did you save the notes from that?

17 A. No. I had that notepad for many years. I'm
18 sorry. It might have just been a piece of paper even,
19 just writing down the pros and the cons.

20 Q. Back to the severance agreement, the one that
21 was executed here. See that back up on the screen,
22 Exhibit 96?

23 A. Sure.

24 Q. Okay. There is a release of claims in this
25 agreement.

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1 Do you see that? It's paragraph two here.

2 A. Sure.

3 Q. So you got -- the consideration paid for this
4 release was \$1.2 million paid \$50,000 a month, correct?

5 A. Yes.

6 Q. Okay. And then what claims did you have, if
7 any, against Ballard when you executed this release for
8 you --

9 A. I'm fairly certain this was boilerplate
10 language. I had no claims against Ballard. I think the
11 point is that when people separate, they don't want you
12 to leave and then come back -- you know, get some lawyer
13 and come back and sue years later. I would not have
14 done that, but I think that's fairly boilerplate
15 language for most severance deals.

16 Q. You would have been at your house in Lake Mary
17 when you executed this?

18 A. Yes, sir.

19 Q. Okay. And then you would have scanned it back,
20 is that how you would have done it?

21 A. Yes, sir.

22 Q. And would you have done that through your
23 Ballard email address?

24 A. I have no idea what email I used to do this.
25 It could have been either which one. I have no clue.

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1 Well, I guess -- you sent the email from Shanna Kaye. I
2 don't know.

3 Q. We issued a subpoena to Ballard and got their
4 emails, and that was what we got.

5 A. I don't know. They would email me at Gmail.
6 They would email me at Ballard.

7 Q. There is a revocation period in here for seven
8 days on page three.

9 Did you contemplate revoking this at all? Do
10 you see that there?

11 A. No. Again, I'm sure that is boilerplate
12 probably because somewhere else in the state of Florida
13 someone in court had that happen, and he gives the same
14 thing there.

15 Q. Going back to the amount, the 1.2 million, how
16 did you come to that amount? Did you propose that
17 amount? Did Mr. Ballard?

18 A. I honestly don't remember. That is a good
19 question. I think it was just, you know, in
20 consideration for my good work at the firm, something
21 that's fair. I didn't -- I don't recall trying to
22 like -- I don't remember any conflict between us about
23 what the number was. I just think it was, is this fair
24 share? That is very fair. Again, Brian Ballard didn't
25 do anything wrong. The Greenberg family did things

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1 wrong to me here. Ballard did not. So this was a very
2 sad time in my life. It was a horrible thing to have
3 happen, and, you know, he was very fair as he always
4 would be.

5 Q. Is it your testimony that there was no back and
6 forth over that amount, that you just came to an
7 agreement? 1.2 million sounds fair --

8 A. Well, I think the idea was how long it would
9 be, and there might have been some back and forth. I
10 just don't remember it. It was not long. It was -- I
11 think it might have been just verbal, like how does this
12 sound? All right, let's do it. It was kind of one of
13 those things where I'm sure -- not to speak for Brian,
14 but I'm sure he was also thinking the fact that I was
15 willing to not try to, you know, fight and bring all the
16 bad wrath on there. He probably found some value in
17 there.

18 Q. Who did you discuss the resignation with other
19 than Mr. Ballard and your attorneys? And I don't want
20 to know what you discussed with your attorneys, and then
21 of course we have that hearing tomorrow about your
22 discussions with Rebekah. So anybody else other than,
23 you know, Rebekah Dorworth, your attorneys at Lowndes,
24 and Mr. Ballard that you would have discussed this with?

25 A. Probably, but I don't remember who. At the

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1 time, I wasn't in a lockdown mode. It was just like
2 this is happening, oh, my god. But again, this is
3 confidential. I would not have shared the agreement
4 itself with anybody, but I might have shared with people
5 I'm leaving. If you want to clarify your question a bit
6 there. I mean, in terms of who I shared this agreement
7 with, it would just be those people.

8 Q. What about your departure from Ballard?

9 A. I tweeted about it.

10 Q. The voluntary --

11 A. And Newsweek.

12 Q. And this resignation took place after your
13 meeting with -- in-person meeting with Todd Gee?

14 A. No, months before -- no, I'm sorry. I don't
15 know. I don't know -- no, actually --

16 Q. Because you said you had met Todd --

17 A. The Gee meeting was after this.

18 Q. Okay. So you resigned in early April then from
19 Ballard Partners, and then your recollection is that the
20 Gee -- meeting in-person meeting with Mr. Hornsby was
21 subsequent to this?

22 A. I honestly -- I think so, but I do not -- I
23 don't think -- when I left the firm, I had not yet --
24 the news story had not -- I'm sorry, when I -- when I
25 went to go visit with the DOJ and the FBI, I was no

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1 longer with Ballard Partners.

2 Q. Okay. So it would have been after then April
3 9th when you met with them?

4 A. Yeah. You have to forgive me with the time
5 schedule here because I don't exactly remember, but I
6 think -- I think maybe -- I think what it was is the
7 first thing -- I think what we got in December was here
8 is the list of all these documents we want from you. So
9 we did that, turned them in, a month or two passed. We
10 called back up, and the FBI guys said, Yeah, we need to
11 get something scheduled. And then this all happened,
12 and then that got scheduled. Because I remember
13 referencing the fact that I lost a job I loved. I'm
14 sorry, give me one second here.

15 Q. You remember referencing it to the FBI in the
16 in-person interview that you had lost your job at
17 Ballard?

18 A. Lost a job that I loved, yes.

19 Q. And you also had mentioned that you got a
20 subpoena from the government around December of 2020; is
21 that right?

22 A. Yeah, that is what I was just referring to.
23 The first one, I was trying to figure out the dates on
24 that, and I think the first one was just a request for
25 documents and this production. It wasn't a let's go

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1 chat, and I think that took some amount of time to
2 compile, and Richard Hornsby sent them all those
3 documents and we didn't hear anything for a period of
4 time. But I think all this stuff took place, and then
5 finally they said, all right, let's come in and chat
6 with us.

7 Q. Okay. How many subpoenas for documents did you
8 get from law enforcement?

9 A. On this matter?

10 Q. On this matter.

11 A. I think just the -- there was one -- one
12 definite one, and then Richard Hornsby -- again, we
13 provided them with all the stuff they wanted and then I
14 got the polygraph test done and then I brought that with
15 me when I went and interviewed -- when I had the
16 interview.

17 I'm sorry, what was the question?

18 Q. I asked how many subpoenas --

19 A. I think just that one. So I was going to say
20 after that, Richard called up and said, Hey, we haven't
21 heard anything from you guys, and we provided the data
22 that he was on a lake and not at the house. And at the
23 time, I didn't know the girls were ever on the gate. It
24 was news to me. So when I got back from that thing, I
25 said, they claimed that they were there.

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1 So that was the first time that Rebekah and I
2 ever figured out that you could go online, and we
3 searched back for it. And I found that, and I found the
4 day that they were there and pulled my phone out. I'm
5 not great for taking pictures, but my buddy just bought
6 the boat, and I had just took a picture of him driving
7 the boat with metadata. Just one of those things in my
8 life that I'm very grateful for because it showed that I
9 wasn't there. But we then provided that information to
10 the feds and said, listen, you asked questions about
11 that, if she came into the gate at this time or
12 whatever. You can say, here is a photograph with
13 metadata taken from my client's phone showing that he
14 was miles away.

15 Q. And that was Mr. Morris, Randy Morris?

16 A. Yes.

17 Q. So in the course of the in-person meeting with
18 the government, they specifically asked you about the
19 July 15, 2017, gathering at your house?

20 A. Yeah, which I said I wasn't at.

21 Q. Okay. And did you tell them that you weren't
22 there the entire day?

23 A. I told them I was on a boat, and that -- at the
24 time, I didn't have the benefit of the car record
25 showing anything. So I just said like, listen, I was

1 there. I was not at a party that day, did not meet that
2 girl. I have never met "AB". I think I met K [REDACTED]
3 M [REDACTED] one time when she was Joe Ellicott's girlfriend.

4 Q. And on July 15, 2017, you're out on a boat with
5 Mr. Morris around the 6:00 hour that evening --

6 A. Randy's birthday is July 13th. My birthday is
7 July 17th. So, you know, what we would do is get
8 together at the midpoint on the 15th, and we would
9 usually -- typically a day with Randy consisted of a lot
10 of bourbon. Usually we would pick up Publix and get
11 some fried chicken from Publix or something like that.
12 Go out on the boat, hang out. There is a chain of lakes
13 in Winter Park which I'm sure you're familiar with.

14 We go do that for awhile, maybe get a bite to
15 eat, maybe not. Go back to his place, and he had a lot
16 of vinyls and stuff and we would watch movies. Just a
17 good buddy of mine. It was a birthday celebration. My
18 wife was out of town, and I hung out with him.

19 Q. And is it your testimony that you spent the
20 night at Mr. Morris' house?

21 A. I don't -- this is beyond what I have in terms
22 of my own recollection. I know I fell asleep. When you
23 say spent the night, that causes some consternation for
24 me because I probably wouldn't spend the night there.
25 What could very well happen is I could fall asleep and

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1 wake up at 1:00 in the morning or something like that
2 and go home. That is -- that was fairly -- you know,
3 that would be pretty typical because I wouldn't want to
4 drink and drive.

5 (Exhibit 99 was marked for identification.)

6 BY MR. PERKINS:

7 Q. The next exhibit is the covenant not to
8 compete, Exhibit 99, and this was a covenant not to
9 compete that you executed with Ballard Partners on or
10 about December 5, 2012.

11 Do you see that?

12 A. Yes.

13 Q. Okay. And this was also produced by Ballard
14 Partners in response to our subpoena. This document,
15 paragraph three, page two, talks about a noncompete for
16 two years.

17 Do you see that, following --

18 A. Yes.

19 Q. -- your leaving Ballard Partners?

20 Did this still apply after you voluntarily
21 resigned from Ballard Partners on April 9, 2021?

22 A. Yeah. So the noncompete was -- I actually
23 asked -- you just jogged my memory. I actually asked if
24 I could have this waived, and he said, no, I don't -- I
25 think they wanted me to come back at the time, and, you

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1 know, he just said, Listen -- if you read this
2 noncompete, I think it was the only one the firm had had
3 this, and he wouldn't do them anymore. It basically
4 said, let's say you have a client. The client leaves --
5 or you leave the firm and the client wants to come with
6 you. If it does not impact what the firm was making, it
7 does not affect me. So if they're making \$10,000 a
8 month and I get hired and they're still making \$10,000 a
9 month, there is nothing there. It was contemplated that
10 way, so, I mean, it was a soft a noncompete as you could
11 have. So, yeah, I think it was still in effect.

12 Q. Okay. You asked to get out of the noncompete,
13 and Brian said no?

14 A. I think -- that's probably an overstatement.
15 It was more one of those things I said, What about the
16 noncompete? He said, I want to keep that. If you have
17 anything, just talk to me. It was -- our relationship
18 with Brian is such it was not at all antagonistic. It
19 was kind of like, hey, if you need something, let me
20 know. But, I mean, I don't -- I'm not in the business
21 of waiving out of those things. I got the impression it
22 was more -- not so much a me specific thing, but just
23 like we don't make a habit of people leaving and doing
24 that.

25 Q. When is the last time you have had contact with

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1 Mr. Ballard?

2 A. Probably last year.

3 Q. And what were the circumstances of that
4 contact?

5 A. Just calling to check in.

6 Q. This noncompete would have been in place then
7 from April 9, 2021, through April 9, 2023?

8 A. Sure.

9 Q. For two years. And that would mean you could
10 not work for any client of Ballard during that
11 timeframe?

12 A. Yeah. I don't really agree with your
13 characterization of what this agreement says. The
14 noncompetition element of this was designed to protect
15 Ballard Partners from people robbing the firm -- leaving
16 the firm and taking clients with them. It was not
17 designed and it does not necessarily -- it doesn't stop
18 me from working for a Ballard Partners client. If you
19 read it, it says, During the term -- excuse me, Unless
20 the fee -- unless the fees paid to the firm remain
21 unchanged from a client of the firm who retained the
22 firm before the employee's hiring and regarding any new
23 client brought to the firm by the employee, the firm
24 shall receive 30 percent of the gross fee. So it says
25 if they don't change the fees then it doesn't matter.

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1 Every client I ever worked with, no one would be like,
2 We're going to give you this. It's just not the way
3 that works. I mean, they would -- so I mean, it is a --
4 Brian did not like this noncompetition agreement because
5 he said I will never sign another one of these again.

6 Q. After departing Ballard, did you in fact work
7 with any clients of Ballard?

8 A. No.

9 Q. None whatsoever?

10 A. Well, not as a lobbyist, no.

11 Q. What about as a consultant?

12 A. Florida Power and Light.

13 Q. Any others?

14 A. I don't think they have ever represented -- the
15 two I represent are Florida Power and Light and the
16 Taxpayers Against Insurance Bad Faith, and I don't
17 believe Ballard ever worked for Tax Payers Against
18 Insurance Bad Faith. So I think that would be just
19 FP&L.

20 Q. When did you pick up FP&L as a client for
21 consulting purposes?

22 A. I think this year.

23 Q. 2024?

24 A. I think I signed the agreement last year and
25 FP&L had a -- they had some involvement -- there were

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1 allegations surrounding the ghost party thing in South
2 Florida, so they're very removed from that kind of
3 political stuff now. So I gave them my contract, and it
4 took a few weeks for them to come back and say it's all
5 good.

6 Q. And what's the scope of your arrangement with
7 FP&L?

8 A. Strategic advisory stuff. When you have
9 regulated industries, a big part of it is just
10 understanding your regulatory framework, and I have
11 insights in those things.

12 Q. What about Taxpayers Against Insurance Bad
13 Faith? When did you pick up that client?

14 A. It would have been last year.

15 Q. What's the scope of your arrangement with them?
16 What type of services are you providing them?

17 A. Right now, strategic advisory stuff, reading --
18 relandscapes. I was very involved in the transition of
19 Ron Desantis, so a lot of times people will seek out and
20 want to understand how I think certain things might --
21 might be received by the governor and his team.

22 Q. Are you running this through your name
23 personally, or do you have an LLC that you have created?

24 A. I have an LLC called IBW Public Affairs.

25 Q. And that's who has the contract with Florida

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1 Power and Light and the Taxpayers Against Insurance Bad
2 Faith?

3 A. Correct.

4 (Exhibit 100 was marked for identification.)

5 BY MR. PERKINS:

6 Q. All right. The next exhibit will be the text
7 message with Ms. Benner. This is Exhibit 100, and this
8 was in your document production that you made. It's
9 Dorworth 642, and it looks like Ms. Benner reaches out
10 to you on April 8, 2021 --

11 A. Yes.

12 Q. -- at 9:34 a.m. --

13 A. Correct.

14 Q. -- is that right?

15 A. Yes.

16 Q. Was this the first time the press reached out
17 to you regarding Joel Greenberg?

18 A. No.

19 Q. When was the first time that the press reached
20 out to you regarding Joel Greenberg?

21 A. Can you be a little more specific in that
22 regard? What element of Joel Greenberg?

23 Q. His involvement with sexual misconduct.

24 A. That was the first time.

25 Q. Okay. That was the first time?

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1 A. Yes.

2 Q. What about Joel Greenberg and ghost political
3 schemes? When's the first time that press reached out
4 to you in that regard?

5 A. I never had a conversation with Joel Greenberg
6 about ghost political schemes. That's just total
7 bullshit.

8 Q. What about the press reaching out to you and
9 asking you though about --

10 A. This conversation.

11 Q. So April 8, 2021, was the first time the press
12 had contacted you regarding anything about Joel
13 Greenberg and sexual misconduct and ghost political
14 schemes.

15 Is that a fair statement?

16 A. Yes. I don't recall -- that was the big one.

17 Q. Is this text message what prompted you to start
18 contemplating your resignation?

19 A. Yes.

20 Q. So April 8th, you get this text message from
21 the New York Times reporter, and then you turn around a
22 severance agreement and release within 24 hours and
23 execute it on the 9th?

24 A. Absolutely.

25 Q. It happened that quickly?

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1 A. Absolutely.

2 Q. Now, when Ms. Benner sent you this text message
3 on April 8th, did you reach out to her?

4 A. I did.

5 Q. Okay. And how did you reach out to her? Was
6 it text message? A telephone call?

7 A. A phone call.

8 Q. How long did you speak with Ms. Benner?

9 A. It was not a short conversation. Probably an
10 hour.

11 Q. And what did Ms. Benner share with you in the
12 course of this hour-long conversation?

13 A. That -- well, I mean, basically everything. I
14 mean, basically that the -- they had been provided
15 documents that showed the feds were looking into me,
16 Halsey Beshears, Joel Greenberg, Joe Ellicott, and Matt
17 Gaetz. I had -- I believe I provided her although I
18 don't -- I'm not sure about this, I think I gave her a
19 copy of the screenshots where Joel threatened me and
20 said that -- you know, that everyone needed to lawyer up
21 or that Vince Citro said, Oh, Joel said you wanted
22 lawyers. I think I shared that.

23 And, you know, she said that -- I guess at the
24 time, I mean, listen, this was all new and none of it's
25 true. When this sort of thing happens, you picture how

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1 are you going to act when that happens? I just wanted
2 to know what details. Like what are you talking about?
3 I was at a party where there was a 17-year-old girl and
4 had sex. It was -- this was the first time anyone ever
5 sort of fleshed a lot of these details out as to what
6 the allegation was.

7 And so I spent a lot of time asking her
8 questions. I was very vehement in my denial that I was
9 not at the party. I was very vehement in my denial that
10 I never met "AB", sure as hell never had any sexual
11 interaction with "AB", and that -- you know, that this
12 was -- and my statement was, you know, when I shared
13 everything about Joel, she said, Well, that's consistent
14 with what I know that I think his lawyers -- I believe
15 it was Dave Webster. I'm about 90 percent sure of that
16 because it was -- she said it was not one of Joel's
17 lawyers, but it was -- basically she made statements. I
18 don't remember exactly what they were, basically
19 intimated to me that it was somebody or affiliate with
20 the Greenberg family that had dropped this documents.
21 It was not -- and I asked her, Did this come from DOJ?
22 She said, We don't share that, but in this case I can
23 tell you it's not. We didn't get these documents from
24 them.

25 Q. And what was your understanding of what David

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1 Webster was doing back in April of 2021, who he was
2 representing?

3 A. Well, I mean, he identified himself as Abby's
4 attorney at one point in time. A journalist -- I can't
5 remember who. I really wish I could, but one of the
6 journalist told me I have a Dave Webster problem because
7 Dave was going around and trying to pedal stories to get
8 the Greenberg -- to get more people indicted so that
9 Joel could spend less time in prison funded by the
10 Greenbergs.

11 Q. What media outlet said that you had a Dave
12 Webster --

13 A. I truly do not -- I talked to dozens of people
14 at the time it was just nonstop conversations. I would
15 love to know the answer to that question. I do not
16 recall. I remember someone telling me very clear that I
17 had a Dave Webster problem. I remember where I was
18 sitting when I had the conversation, but I don't
19 remember -- it was on the phone.

20 Q. Do you recall the rough timeframe of that when
21 you --

22 A. It was whenever it was going on.

23 Q. Was it around April of 2021?

24 A. No, it was later.

25 Q. Do you have a ballpark for how much longer it

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1 was?

2 A. No. Months later -- well, it was after Joel
3 burned all of Abby's stuff, and Daven and John Morgan
4 talked him out of the house.

5 Q. And what was your understanding of the scope of
6 Dave Webster's engagement with Abby Greenberg, what he
7 was doing for it?

8 A. I have no understanding of the scope. I'm just
9 telling you what I was told.

10 Q. And who told you that?

11 A. Well, that, I believe -- I think some
12 journalist said that he had reached out to Abby. I
13 said, I don't know. At the time I didn't realize
14 exactly how integral she was until the 117-page lie
15 thing that Joel did trying to get his prison sentence
16 down. But at the time, I didn't know that Abby had
17 gone -- had -- basically what Abby does is she'll do
18 whatever the Greenberg family says because they pay for
19 her life, and she -- she told me wife that she'd never
20 been happier in her marriage after they -- after she got
21 caught -- after Joel got in trouble for this because it
22 gave her total authority over him and the parents. That
23 was the kind of the dynamic of the relationship, and I
24 remember at the time someone saying that the Dave --
25 that they reached out to Abby, and she sent them to Dave

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1 Webster. Again, it was another journalist, and I
2 don't -- I'd love to tell you. I just don't know. If I
3 gave a name, it would be a guess. But then at one of
4 the trials, the final thing -- maybe the sentencing or
5 the plea guilty or whatever it was, Webster entered
6 into -- came in, showed up, and signed on as a lawyer
7 for Joel.

8 Q. For Joel Greenberg?

9 A. Yes. So he wasn't a lawyer back then for him
10 but whatever this time was. It was --

11 Q. When he was sentenced?

12 A. I don't think it was the sentencing. I think
13 it's when he pled guilty, but again, I...

14 Q. Ms. Benner mentioned she's gotten, you know,
15 you said documents that she was given to look at.

16 Do you know what those documents are?

17 A. I assume it's a copy of the subpoena, but that
18 is a true assumption.

19 Q. Did you discuss her sources of information at
20 all on the call?

21 A. Not surprisingly, the Pulitzer Prize winner
22 from the New York Times would not share her sources. I
23 mean, she -- I asked her. I think at one point in time
24 I said, Just tell me is this a leak from the government?
25 And she didn't come right out and say no, but she gave

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1 me an answer that led me to believe that this was given
2 from outside.

3 Q. Did you take notes of this conversation?

4 A. No.

5 Q. Did you record it?

6 A. No. It's against the law.

7 Q. Do you have any recordings of conversations
8 with Abby Greenberg?

9 A. No.

10 Q. Do you have any jailhouse recordings of
11 conversations between Joel Greenberg and Abby Greenberg?

12 A. No. I'd like to get those though.

13 Q. Was a story -- this text to you, do you know
14 how Ms. Benner got your cell phone?

15 A. No.

16 Q. Did you ask her how?

17 A. I don't remember.

18 Q. Ms. Benner said she's working on a story today
19 related to the Greenberg hearing that will include the
20 expansion of the government inquiry beyond Greenberg and
21 Gaetz.

22 Did she, in fact, run a story on that day?

23 A. I don't know. Probably. Katie was very
24 much -- she was ahead of the curve.

25 Q. And what do you mean she was ahead of the

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1 curve?

2 A. I mean, she figured the story out. She broke
3 the story, first of all, and then I think she pretty
4 quickly figured out that the Greenbergs were fueling
5 this and it was, you know, an attempt to drag Matt into
6 it and then lost interest in it. I think she put her
7 reputation to a certain degree -- a story about a tax
8 collector in the 13th largest county in Florida is not
9 really worthy of the New York Times.

10 The Matt Gaetz stuff is, and I think she --
11 again, I can't speak for her, but the impression I got
12 was I think she talked to everybody and talked to
13 everybody involved, and I don't know what led to the
14 calculus for her believing this, but she at some point
15 in time stopped believing that there was -- that Matt
16 was ever going to get charged and it was kind of a
17 nothing for her. That's why the Times stayed away from
18 it for a very long time.

19 Q. And you said that Katie broke the store, that's
20 the story of "AB" and July 15th?

21 A. No, I'm referring to the Gaetz being in trouble
22 story, the one that sort of got the whole -- the first
23 story did not mention me. It was just Matt Gaetz is
24 subject to investigation for -- it involves child
25 trafficking with Joel Greenberg. That was the first

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1 one. Then that day, I was in Tallahassee. I was
2 actually having dinner with my friend, our attorney,
3 Alex, and then Matt went on Tucker Carlson and had an
4 interview. And after, that it was like I looked up and
5 there was about 25 people that wanted to talk to me, and
6 I said I'm going home. Go home to my condo in
7 Tallahassee, woke up the next day, called Brian and said
8 it was probably better for me to clear out while this
9 was going and went home.

10 So when I went home, then the followup story
11 came. That's where this all came, where the suggestion
12 that there was -- that she was going to write this, and
13 the story that she wound up writing said that I -- that
14 somebody had witnessed me have a conversation about
15 third parties.

16 Q. And that was the ghost political stuff?

17 A. Yes.

18 Q. There was nothing in there about you and "AB"
19 or sex trafficking minors --

20 A. Again, 90 minutes of me being I have been met
21 this human being. This is a lie. I think this is -- I
22 was steadfast enough in my denial and not equivocating
23 what she decided that that was not worthy to -- she said
24 I need to mention the fact that a major lobbyist was,
25 you know, having a conversation with a substantial US

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1 congressman about whether or not to interject themselves
2 into a state senate race that has attracted attention.
3 I said, well, I don't love it, but there is not much I
4 can do about that. If you write that, you write that.

5 Q. How many times have you spoken with Ms. Benner?

6 A. Three or four.

7 Q. When was the other times other than April of
8 2021?

9 A. I don't know when, but, yeah, I mean I have
10 talked to her three or four times. Usually typically
11 around when major things in the case would happen like
12 when Joel pled guilty or got sentenced -- or he was
13 getting sentenced. I think she asked -- we had a
14 conversation where she asked me what I thought he was
15 going to get, and she busted out her own little
16 calculation tool. It would be just little things around
17 the court case. We're not friends, if that's what
18 you're asking. We don't check in.

19 Q. And how would you go about contacting her?
20 Would she text you and say, Hey --

21 A. Call. Usually she's pretty good about phone
22 calling. I just told people, I'm like, listen, I
23 don't -- I just assume that all my text messages are
24 going to wind up as being part of a deposition or other
25 things. So if you want to talk to me, call me. Let's

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1 not have a bunch of long...

2 Q. Would she call you, or would you call her?

3 A. I think she was the one who would initiate
4 basically every conversation.

5 Q. So if something would come up, she would give
6 you a ring and get your insight on it?

7 A. Yes.

8 Q. And you think this occurred three to four
9 times?

10 A. Maybe three times, maybe four times, maybe five
11 times. Just a handful of times. Nothing ever like the
12 first conversation. The first conversation was a very
13 long, intense conversation. The New York Times was
14 writing an article about you, like that, it has a way
15 of -- I mean time slows down, and I went through it with
16 her, and was vehement -- at the time I had no idea what
17 the location was. I didn't know anything. They're
18 saying it was -- I mean, they said I also had sex and
19 even these allegations are that I had something other
20 than sex. I mean, a lot of this information kind of
21 came out, and I was like, what are you talking about?
22 Where did this supposedly happen? Who is it that -- at
23 the time I'm trying to figure out who.

24 Q. What did she say specifically about you and
25 sexual relations with "AB"?

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1 A. Well, Joel Greenberg had alleged that Gaetz had
2 done it, and he was expanding the allegation to say that
3 I was doing it. I had done it as well.

4 Q. And with respect to you, what did she say? Did
5 she say that it occurred on such and such date --

6 A. She didn't have any dates at that time. I
7 don't think there was any level of detail that I was
8 presented in terms of there was a party at my house, she
9 was there, she claimed I was there -- somebody claimed I
10 was there, and I said, well, that doesn't really pencil
11 because I don't have huge parties at my house when I'm
12 not there. It would not be uncommon to have five or six
13 or seven people over. It would not be uncommon to have
14 Joe Ellicott and his girlfriend over. It would be weird
15 to have another random person kind of just over at the
16 house especially with my wife not there.

17 So I just said it's easy to remember. I have
18 young kids at the time too, so I'm pretty good about
19 remembering who I met and be good with faces, try to
20 know your kids' friends' names. I think that speaks
21 well of a parent to do that. So, I mean, I'm tuned into
22 those things, and I never met the woman. So I shared
23 with Katie Benner, I said, I don't know who that is. I
24 have never met her. We have never spoken, never texted,
25 never had a phone conversation, not Facebook friends,

1 not Instagram friends. I sure as hell don't have a
2 money trail to her. I don't have any history with this
3 human being at all. Never met her.

4 Q. Did Ms. Benner show you pictures of "B" at this
5 point in time?

6 A. No.

7 Q. When was the first time you were shown pictures
8 of "AB"?

9 A. I think somebody gave me the name, and I looked
10 her up. Like v [REDACTED] 99, [REDACTED], I think -- you can't
11 even find her. You have to actually go find her porn
12 star name or whatever it is.

13 Q. Have you gotten paid the entire amount of the
14 severance all 1.2 million?

15 A. Yes.

16 Q. And did you get paid 50,000 each month?

17 A. Yes, I did.

18 Q. So it would have been 450,000 in 2020, and then
19 600,000 in 2021, and 150,000 in 2022?

20 A. It sounds good to me.

21 Q. Does that sound right?

22 A. I don't have pencils.

23 Q. The severance agreement says that you were to
24 maintain Ballard's health insurance until April 15,
25 2023?

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1 A. Yes.

2 Q. Did that take place?

3 A. Yes. Everything pertaining to that contract
4 went as according.

5 Q. Did you have any other benefits from Ballard
6 after you voluntarily resigned?

7 A. No.

8 (Exhibit 101 was marked for identification.)

9 BY MR. PERKINS:

10 Q. The next exhibit will be 101, and this is
11 the -- I think it's a Newsweek article then, Florida
12 Politics article. I don't think it's fair, longtime
13 Matt Gaetz associate resigns from lobbying firm amid
14 probe?

15 A. I believe that is a Newsweek article.

16 Q. And this is Dorworth one, you produced this.
17 Do you recognize this article?

18 A. Sure.

19 Q. It was published shortly after you resigned
20 from Ballard, correct?

21 A. Yes. I don't know -- is that the complete
22 article.

23 Q. It goes on to have your texts, your tweet is
24 embedded in there.

25 A. Yeah.

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1 Q. It looks like there is a tweet from you from?

2 A. Yes.

3 Q. And you posted it on the date that you
4 resigned, April 9, 2021?

5 A. Yes.

6 Q. Friday. It says, I always loved working for
7 Ballard. Best boss, best coworkers, best clients. The
8 current political environment is nasty, and as I told
9 Brian, I didn't think it's fair for the recent media
10 storm to take away from their missions. A classier or
11 and more affective group I couldn't imagine.

12 Did I read that correctly?

13 A. Yes.

14 Q. And what's that media storm that you're
15 referring to there in your tweet?

16 A. The fact that Joel decided to start trying to
17 implicate myself and Matt Gaetz into his wrong doings
18 that led to the media storm.

19 Q. Did you run this tweet by anyone before you
20 posted it? Did you run it by Brian Ballard?

21 A. I doubt it. I can't tell you that positively,
22 but, I mean, Brian, he would go to me to go write the
23 tweets. That was kind of part of my communication. So
24 I might have sent it to him and said, Hey, are you cool
25 with this? I might have posted it and said, Is this all

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1 right? I can change it. I don't know, but, I mean, I
2 don't think for a thing like that. That's kind of a
3 personal message. I don't think I would have had to get
4 an approval for that. Also, what's he going to object
5 to? It's not at exactly burning the ships.

6 Q. Other than email, how would you communicate
7 with Brian? Did you guys text?

8 A. Phone.

9 Q. All phone calls, no texts?

10 A. Oh, no, we text.

11 Q. You text him too?

12 A. Brian is one of those people who is a one-day
13 Signal person.

14 Q. And he resides in Tallahassee?

15 A. He's got -- I think -- I believe he's a Florida
16 resident based out of Tallahassee. He has got a house
17 in Austin, Texas, and a condo in New York City too --
18 well, at least he did. I haven't talked to him about
19 his real estate holdings lately.

20 Q. In the article it says that you left the
21 lobbying firm because you didn't want press reports to
22 harm the company.

23 Do you see that?

24 A. Yes.

25 Q. And was that the New York Times article that

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1 you were referring to there? Because the day before you
2 had just talked with Ms. Brenner, right?

3 A. Dorworth confirmed to Florida Politics that he
4 had very amicably left the lobbying firm because he
5 didn't want press reports to harm the company.

6 What's your question?

7 Q. The press reports that you're referring to
8 there, bad press reports --

9 A. Yeah, there was a bona fide ton of press
10 reports. There was the New York Times, Tucker Carlson.
11 I mean, for Tallahassee, Florida that's considered -- I
12 mean, for any place. Any place in the world, that's a
13 big deal.

14 Q. Staying on Exhibit 101, page two of four it
15 says, On Thursday Dorworth's name was mentioned in a New
16 York Times article which reported that Joel Greenberg, a
17 Gaetz associate and former Orlando county tax collector,
18 is expected to plead guilty to charges related to the
19 alleged scandal in a plea deal agreement with federal
20 investigators.

21 Then it goes on to say, Two unnamed people
22 familiar with the inquiry told the Times that
23 investigators were told Gaetz and Dorworth had discussed
24 potentially putting a sham third-party ballot forward in
25 the 2020 state senate race to hinder the campaign of an

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1 opponent to Jason Brodeur, a Gaetz ally.

2 Did I read that correct?

3 A. Yes.

4 Q. Did you ever figure out who those unnamed
5 people were?

6 A. I believe it was Joel and Abby, and it was a
7 lie.

8 Q. And why?

9 A. Excuse me.

10 Q. What facts and circumstances lead you to
11 believe that it's Joel and Abby Greenberg that were the
12 source of the article about the ghost political opponent
13 for Jason Brodeur?

14 A. Well, first and foremost, that conversation
15 never happened between me and Matt Gaetz. So when --
16 down the road a bit when Joel had sort of run out of all
17 his options to lie about people, try to get them charged
18 with crimes, when that didn't work and Joel finally got
19 his sentence, at that point, I'm -- at that point in
20 time, he did the courthouse -- it was in the Seminole
21 County courthouse. It was with FDLE, and it was with
22 Stacy Sammons. I want to say it was like 117 pages or
23 122 pages. It was just chalked full of absolute BS.

24 It was kind of -- Joel clearly what happened is
25 he had been hired -- he had hired -- for example, he

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1 hired -- his family hired Patricia Sigman who was the
2 person who lost the democratic race to be their
3 employment attorney, and they did that like one month
4 before Joel went in there. And Joel was an idiot.
5 Nobody that ever listened to Joel Greenberg talk was
6 like, We should get his thoughts on things, because he
7 was known to be highly undisciplined. He had a big
8 mouth. He was stupid. I mean, he would make bad
9 decisions and get himself dragged in the papers all the
10 time.

11 The idea that I would ever have any
12 conversations -- anything that he detailed in that 122
13 pages is just a pure work of absolute fiction, and it's
14 funded by the Greenbergs who obviously hired Patricia
15 Sigman to try to give some sort of internal color. But
16 I thought the entire thing came off as Joel sounding as
17 stupid and untuned as I generally think he is in person.
18 But in that document he does say that he saw me and Matt
19 Gaetz talking about this. So that is why I believe it
20 was Joel Greenberg, and I think the person that would
21 lie with him is Abby Greenberg because the Greenbergs
22 pay her. That's why I think it was that way.

23 Q. That is the only basis for your including Abby
24 in there --

25 A. No. Abby was very active with the press. She

1 would talk to Jose Pagliery at the Daily Beast. Abby
2 was upset, and the first time I ever met Joel Greenberg
3 he like literally the first time I met him -- well, the
4 first time I met him was at the Trump rally. The next
5 time we met, I think we met for a cocktail, and the
6 third thing out of his mouth was he had just -- he had
7 an open marriage with his wife. Which I kind of giggled
8 at because I was like, who leads with this?

9 If this is the way that your life has worked
10 out, that's okay. Do your own thing, but before the
11 breadsticks get there, he's already saying, yeah, we're
12 in an open marriage. And I jokingly said, Well does
13 Abby know that? And he said, Yeah, yeah. We're
14 totally -- all those things. And then years later, Abby
15 would get mad at a girl she believed Joel had sex with.
16 I don't know if she did or didn't. I have no firsthand
17 knowledge of that or even secondhand knowledge.

18 But Abby then started bashing M [REDACTED] Z [REDACTED],
19 trashing her all around town because she did this. So,
20 you know, Abby was a source to the Daily Beast about a
21 bunch of stuff, and the journalist even texted my wife.
22 I think we provided that to you. Saying, like I can be
23 trusted. It's very clear that the person who is saying
24 all this stuff is Abby probably at the behest of the
25 Greenbergs. I don't know how it works. I just know she

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1 does whatever they say because they pay for her life,
2 and she's more than happy to -- you know, to do whatever
3 but just for the money.

4 Q. And what do you know about the Greenbergs
5 paying for her life?

6 A. Again, my intel with her stops when we
7 stopped -- when Rebekah and her stopped being friends.

8 Q. And when was that?

9 A. That would have been a great question for
10 Rebekah, but at some point in time Abby -- this
11 narrative came to be that Joel was really a victim in
12 all this, and this is very classic Greenberg family.
13 They would say, well, you know, many people have done
14 these things, and Joel was just one of them. I'm here
15 to warrant to you that is garbage. That is not true.
16 Joel Greenberg did this stuff. He even did this stuff
17 back to like 2012 to 2013 according to Joel, maybe
18 before that. None of us were into this stuff. Nobody
19 else had any of these things. I had just gotten married
20 the year before. My wife was pregnant. I was not into
21 any sort of weird stuff. Joel was, and he was very open
22 about it and Abby was. So they're just a very different
23 bunch of people. I forgot what the question was.

24 Q. You had mentioned that -- I asked you about
25 when the friendship broke off with Abby Greenberg.

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1 A. I think Abby was going around, she was
2 basically -- she had told Rebekah that she had never
3 been happier because the Greenbergs had bought her a
4 house, and they had told her that she did not have to
5 let Joel move into it with them. And Abby and Joel are
6 both kind of dysfunctional humans to start with. And so
7 in a situation like that, it became a game of will Abby
8 let Joel move into the house?

9 And at this point in time, I think we were
10 still talking. I think they were still friends. And
11 they were still friends because when Joel went down
12 there -- basically I think -- I don't know this for a
13 fact, but I'm about 95 percent sure happened, I know
14 this because of the dates, and I learned that from
15 Rebekah was that they had said, we don't care if Joel
16 moves in with you or not. That's your decision. You
17 get to make that decision. You don't have to do it.

18 So then Joel and Abby get into this weird thing
19 at the time -- this is just all so tabloid, and I hate
20 telling it. The story's ridiculous. But Joel had
21 persuaded to start having ses with one of the tax
22 collector employees, a guy by the name of Sam Armes.
23 And Sam is a very interesting guy. Like in the J6
24 stuff, like he was the guy that wrote the plan on how to
25 take the Capitol. Just sort of very interesting things,

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1 but she was having frequent sex with Sam Armes, and Joel
2 insisted that it be in front of Joel.

3 And Abby I guess at some point in time decided,
4 no, I kind of like Sam, so we're going to start having
5 sex not around you. So then Joel would handle that by
6 doing things like cutting off her credit card and
7 cutting off her cell phone, swapping out or sim card
8 because that's just what these weird people do.

9 But that happened, and then finally leading up
10 to the move in date because they bought the house I want
11 to say it was 600 grand, but my memory could be wrong on
12 that one but it was in the 600s. It was in that
13 ballpark, and they had committed to doing \$200,000 in
14 renovations for Abby before she could move in. So it
15 became that sort of weird thing where she's in a
16 relationship but Joel's not mad but he wants to watch
17 and she won't let him watch.

18 So finally she is going to move in on Monday.
19 On Thursday she goes and drops her kids at Sue and
20 Andy's house, and then heads south with a friend. Goes
21 to Stuart where her mom was. Joel, I think, probably
22 figured out that the game was over, that on Monday his
23 wife and kids were moving to a new house, he would not
24 be allowed there. I'm sure he was aware of all of those
25 things and more or less realized that his life as he

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1 knew it was probably over, jumps in the car, breaks
2 bail -- or breaks pretrial release or whatever it was.
3 Goes down, shakes -- brakes into the mom's house, does
4 this. I have seen the video. It's actually -- there is
5 a video where the transcription is Abby saying, The only
6 reason I live with him is his parents paid for my house.
7 It's a -- one of those things.

8 But there was a body cam where the cop was
9 talking to Joel. Again, let me paraphrase here. He
10 said something to the effect of, right now the US
11 Marshals have to flip a switch. When that switch gets
12 flipped, I don't have any choice but to take you into
13 custody. Until that switch gets flipped, I can't take
14 you into custody because who knows what is going on
15 here. So you might want to go home.

16 So then Joel jumps in his car, drives back to
17 Orlando, takes all of your client's belongings, all of
18 her shirts, pants, dresses, sweater, Burberry bags. It
19 was a very extensive list. I remember when Rebekah
20 relayed the story to me. Took it out back, doused it in
21 gasoline, and set it on fire.

22 Then there came a cop standoff I guess because
23 Abby figured out -- I don't know how this all happened,
24 but I know there was a cop standoff. And at one point
25 in time, Joel opened the front door and threw a bag of

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1 what he claimed to be munitions out of there. And I
2 think the story as I heard it was John Morgan, the trial
3 lawyer, and Dave Webster talked him out and finally got
4 him to sit himself. So that's how it went.

5 Q. You had mentioned a Jose from the Daily Beast?

6 A. Yes.

7 Q. And you said that you have reason to believe
8 that Abby was corresponding with Jose from the Daily
9 Beast?

10 A. Yes.

11 Q. What facts and circumstances --

12 MR. ANDRADE: I would just object if it
13 solicits any marital privilege communication between
14 my client and his wife, but --

15 THE WITNESS: I don't think it does. I don't
16 mind. Well, I mean, like all of the stories from
17 the Daily Beast paint Abby as like this -- like for
18 example, they called the girl an escort. I don't
19 think she was an escort. I think these were all
20 terms and these were things that Abby decided to do
21 because she was mad.

22 BY MR. PERKINS:

23 Q. Call who an escort?

24 A. In the Daily Beast story it refers to -- you
25 know, I think there is a commercial out right now about

1 Gaetz that says, According to unknown sources two -- you
2 know like people said that Matt did cocaine with an
3 escort. Well, like the people in that room I think were
4 Matt, Abby, and the girl, M^{REDACTED} Z^{REDACTED}, who she would
5 later share with Rebekah she did not like because she
6 found out that she believes -- and I don't know if it's
7 true or not -- that M^{REDACTED} Z^{REDACTED} had had sexual
8 relations with her husband.

9 Of course, you know, they were in an open
10 marriage but that sort of got -- she tried to rewrite
11 that later after everything happened to make it seem
12 like she was a victim in all this. And I think she was
13 just a participant in the lifestyle.

14 Q. And what other facts and circumstances lead you
15 to believe that Abby was talking with the Daily Beast
16 about these events?

17 A. I mean, referencing people that you trust.
18 Again, I think I provided it to you, but all of the
19 Daily Beast articles were highly reflective of Abby
20 Greenberg's view of reality which is not reality. You
21 know, it was Abby's way of saying, Oh, they were doing
22 this and that, and I believe that she's just part of
23 this thing. I think the Greenbergs -- and again, Andy
24 Greenberg was hell bent on getting his son out of jail.
25 And when it became no longer something he could do via

1 legal channels, the entire goal -- we don't have to
2 question this because, again, Mr. Scheller is in the
3 news saying, Matt's going to be more scared, and we want
4 more people to get prosecuted. And it doesn't even
5 occur to anybody that Joel lies about everything. And
6 it's like, oh, well now he is telling the truth. It's
7 just amazing to me the Greenberg family is perpetually
8 willing to believe that Joel is not lying when all he
9 ever does is lie.

10 Q. You had mentioned that there is a -- a story
11 about Matt Gaetz doing cocaine with an escort.

12 A. Yes.

13 Q. And you said the only other person in the room
14 with those two was Abby Greenberg.

15 What are you referring to there?

16 A. I think there was a party after a Lincoln Day,
17 and my wife and I were there. Randal Hunt and his wife
18 were there. I never saw any cocaine there. Although I
19 guess they said that was in the bathroom, but I mean,
20 like, Abby and M^{REDACTED} were there, and none of the other
21 people said anything. It was all Abby. She's the one
22 that said it.

23 Q. Have you seen Matt Gaetz do cocaine before?

24 A. I have never seen Matt Gaetz do cocaine before.

25 Q. This 117-page document you are referring to,

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1 what is that called?

2 A. It's a good -- let's come up with a name for it
3 now. I guess it would be the jailhouse testimony of
4 Joel Greenberg --

5 Q. The jailhouse transcript?

6 A. The jailhouse transcript of Joel Greenberg with
7 Stacey Sammons, I believe the guy from FDLE's name was
8 Troy Cope, T-R-O-Y, C-O-P-E. And I think Mr. Scheller
9 was there on behalf of Mr. Greenberg.

10 Q. And that is attached to your amended verified
11 complaint?

12 A. It is. The last I checked, they were still not
13 un-redacting it, although I think we probably need to
14 follow up on that.

15 Q. And when did you first become aware of that
16 transcript?

17 A. When it was released as part of the prosecution
18 of Ben Paris.

19 Q. And who gave it to you?

20 A. I believe a journalist.

21 Q. Do you recall a rough timeframe that you became
22 aware of that transcript?

23 A. I don't know the date, but I can tell you
24 exactly what was going on. It was the week before Ben
25 Paris had his trial for whatever that was.

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1 Q. Going back now to Exhibit 101 that we have up
2 on the screen. There is a few more quotes that I want
3 to ask you about in this article. On page three of
4 four, Mr. Dorworth, you say, I never met the woman who
5 did run, Dorworth added, never spoke to her,
6 communicated by any written device, gave her money, or
7 anything else.

8 Do you see that there?

9 A. Yes.

10 Q. Is that referring to Jestine Iannotti?

11 A. Yes.

12 Q. And is it true that you never met her?

13 A. No.

14 Q. Never communicated with her?

15 A. No, I was specifically asked by one of my very
16 best friends in the world to stay clear of this. Now, I
17 didn't want to -- these are not fun things to do. I
18 didn't want to do it in the first place, but I was more
19 than happy just do say, yep, sounds good to me. So I
20 never met her, never had anything to do with any of her
21 campaign.

22 Q. Jason Brodeur --

23 A. Directly or indirectly.

24 Q. Jason Brodeur is your best friend?

25 A. One of my best friends, yes, for 29 years.

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1 Q. So it is your testimony that Ms. Iannotti would
2 not be in your phone contacts?

3 A. Yes.

4 Q. And it is your testimony that you have never
5 communicated with her via text, email, or any other way?

6 A. I will be as expansive as I could be. I have
7 never communicated with her written, oral, or messenger
8 pigeon, smoke signals. I have never had any
9 communication with her.

10 Q. In the race with Jason Brodeur and Patricia
11 Sigman, that took place in November of 2020?

12 A. Yes.

13 Q. And do you recall when Jestine got involved in
14 that race?

15 A. I mean, I don't recall, but I can impute. I
16 mean, I know the qualifying is typically -- just say
17 from back in napkin purposes, probably the third week of
18 June. So probably like June 20th when she got in -- all
19 the stuff happened, but I don't know the exact date.
20 And I wasn't paying a particular amount of attention to
21 her. Oftentimes, I mean, I think like if you look at
22 the race in South Florida, if you kind of use that as a
23 paradigm for this new existence of things, they had two
24 people who had the exact same sounding name, literally
25 Rodriguez. It was an NPA named Rodriguez, a democrat

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1 named Rodriguez, and a Republican who I don't remember
2 who was in that race.

3 But the point is it was -- the similarities
4 were such where a reasonable person could look and
5 think, okay, Rodriguez versus Rodriguez, which one do I
6 like? And maybe have some language barrier, who knows;
7 but Brodeur -- what's the -- Patricia Sigman, and
8 Jestine Iannotti, I don't think there is any similarity
9 in the Jestine Iannotti. I don't really -- I didn't
10 find that, so I was like, well, that's odd; but again,
11 people run for office. They run as an NPA. They do
12 it -- there is just all sorts of things. So it's not --
13 I mean, it happens all the time, but I have never met
14 her.

15 (Exhibit 102 was marked for identification.)

16 BY MR. PERKINS:

17 Q. The next exhibit here will be 102. These are
18 some interrogatory answers that were given in this case
19 to Andrew and Susan Greenberg. Now, keeping on the
20 theme of Ballard, I wanted to ask you a question about
21 your answer to interrogatory number six on page four of
22 ten here.

23 Do you see that up on the screen?

24 A. Yes.

25 Q. And these are your interrogatory answers,

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1 correct?

2 A. Yes.

3 Q. Okay. And you state in 2023 you had a
4 discussion with Brian Ballard about rejoining Ballard
5 Partners; is that right?

6 A. I don't really like the way that's
7 characterized, but it's mostly right. I talked to him
8 about my future, and we talked briefly about potentially
9 me moving back -- going back to Ballard. He said that
10 he wanted to talk with his coworkers to see -- just
11 basically talk to everybody else to make sure -- and a
12 lot of that, by the way, we like Chris or we don't like
13 Chris. I think it's more there is a critical mass of
14 business in the firm, and if I come back, it's not like
15 there is all of a sudden a new swot of business that
16 just shows with me.

17 So it would probably necessarily involve other
18 people's compensation being affected. And so if you
19 want to chat with him about that, he did, came back and
20 said to, man, everybody in the firm wanted me back, was
21 excited for it, but that the inn was full and that I
22 would basically start rebuilding my professional
23 practice from scratch.

24 Q. Who brought up the idea of you coming back?
25 Was it something that you reached out to Brian and

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1 looked into or --

2 A. It was quite literally a conversation of what
3 are you up to? Because at that point in time, we had
4 some -- we had the completion of the federal case, and I
5 think it was more of a check-in. I mean, I had gone and
6 over a period of nine years a very extensive client
7 roster that got taken from me in a day and to go back
8 and get it was going to take several years.

9 Q. Was this discussion over the phone?

10 A. The first time I saw him was in -- actually was
11 in Tallahassee. I came back to go visit him in his
12 office, and the second time was on the phone. A follow
13 up conversation.

14 Q. So it was over the course of two conversations?

15 A. Yes.

16 Q. And if you had come back, your guaranteed
17 compensation would be between 180 and \$200,000?

18 A. I mean, the word guaranteed is yours. The way
19 Ballard Partners works is you assign fee credits based
20 on client work. So say hypothetically you bring a
21 client in for \$10,000, you get a certain percentage of
22 that. Brian, as the head of the firm, has the right to
23 take some of your fee credits and give it to other
24 people. So there is multiple people covering it, what
25 you intend to do is if I brought a client in, they

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1 were -- if I brought a client in, he might take some of
2 my fee credits and give it to somebody else, but then he
3 would take some of theirs and give it to me. So you
4 made a little bit more money, but it was more work.

5 Q. Well, when I looked at your -- the pay slips
6 from Ballard, it looks like you had been getting like
7 \$300,000 a year. That is kind of what I would call
8 guaranteed compensation, and the rest was bonuses.

9 A. I understand what you're saying. So it's not
10 really the way -- that's not the way it works. It
11 wasn't a guaranteed anything. That was the draw. And
12 so if the theoretically I think my bonus -- my base was
13 300, and that was through your monthly paycheck.

14 Q. You got 12,500 twice a month?

15 A. Twice a month.

16 Q. And how was your draw set? Was it set like --

17 A. Well, if I made -- and I never did this, but if
18 I ever made less than \$300,000, I would have had to pay
19 it back. I don't think it was -- I think like the
20 first -- I mean, the first 300 I want to say it was sort
21 of like to me, and then after that there was an
22 overheard number which was about 4,000 a month, would be
23 32, 33 a month. And then from there, there was a share
24 where Brian got -- it was all basically a formula. But
25 the way it practically worked was Brian had it all

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1 worked out. And I bring in clients, and there would be
2 certain issues.

3 I mean, a lot of lobbying is very politician
4 and issue specific. If there is somebody that you know
5 who have a good relationship with somebody else and they
6 need your help, and that is the case for me. I mean, I
7 don't know everybody in the town. I know a lot of
8 people there, but there are certain -- for example, the
9 Department of Transportation. Ballard probably has the
10 best practice for that in the state of Florida.

11 So people at my firm, I'm good at DOT stuff,
12 but there are people who would be better. So I might go
13 to them and say, I have this client. Let's go ahead and
14 work on that together. So it's based on a fee credit
15 share arrangement. And the key is -- I'd liken it to
16 farming. You know, you plant the seeds, the crops grow
17 up, you gather them. And, you know, what this was to me
18 was I went from a place where I was generating over a
19 million dollars a year to being -- it's like, all right,
20 basically back to scratch. And Brian -- I think the
21 number would have been under 200 for the first year.

22 Q. When were your draws set? So if they were
23 going to say, Hey, you're going to get 300,000 this year
24 in draws, 12,500 twice a month, when would that be done?

25 A. I only had two ever -- draw salaries

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1 negotiations ever. When I first got there it was 13 a
2 month, and then 2019 it went to 25 a month.

3 Q. Right. It was 156,000 year, and then it bumped
4 to 300,000 a year, correct?

5 A. But I never -- there was a never -- I don't
6 know -- the truth is I don't know what would happen
7 because it never happened where -- like by the time I
8 bumped my base to three, a big part of that was my book
9 was so big that you would never get below \$300,000.

10 Q. But that was set in advance of that calendar
11 year, right? Correct, like in December perhaps you
12 would come in --

13 A. No. This was not a very -- there is no HR.
14 There was an HR, but the person you had a conversation
15 with was him. And I think at some point in time, I was
16 like, Hey, man, I understand when we had a \$13,000 base
17 the draw d-- guaranteed amount, whatever -- for the
18 first two years it was guaranteed. So when I first took
19 the job in say December 1, 2012, through -- so I think
20 maybe it was 18 months, whatever it was, maybe 18 months
21 guaranteed, and there was 360 a year. That was the
22 total compensation was. After that, it was just my base
23 salary plus quarterly true ups for amounts. It was
24 based on fee credits.

25 Q. And when I'm looking at this interrogatory

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1 answer and I see 180 to 200,000, that would have been
2 your draw?

3 A. No, that's -- before that would have been the
4 case. This -- yeah, I mean, it probably would have been
5 taken in the form of something like that. We never got
6 to the point of negotiations. It was like is this
7 guaranteed, we have to pay that out. We never got to
8 that. It was just basically like, Hey, you have to
9 start back and rebuild this. He said, You know what
10 goes into this.

11 Q. And at the time, you believe you could have
12 made more money outside of Ballard?

13 A. No. At the time, I don't know. I don't know
14 if I would -- I mean, I haven't -- I make 15,000 a month
15 right now, so I don't know that it would be more money.
16 You know, it's a different lifestyle. When you work at
17 a firm, the first time through, I had a lot of respect
18 for my peers and for my peers. It was a very good
19 working environment. I felt truly loved when I had to
20 leave. People called me, and people were very upset and
21 it was a big deal to the firm. It was -- and I'm just
22 like I had nothing to do with this stuff. I have no
23 idea how I'm even dragged into it.

24 And so the conversation would have been with
25 Brian, and we never got to a point where I was saying

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1 like, Hey -- I don't even know what a 200,000 breakdown
2 would be. 16,600 a month or something like that. So I
3 think that would be -- I think basically the idea was I
4 was going to have to start from scratch, which this was
5 my impression of what scratch was based on the
6 conversation, and we would have to go from there.

7 Q. What do you currently do for a living?

8 A. Lobbying.

9 Q. Is that the two clients --

10 A. Or not lobbying, consulting.

11 Q. That's the two clients we talked about?

12 A. Yes.

13 Q. And is it your testimony that you're making
14 about 15,000 a month right now?

15 A. Yes.

16 Q. What are your current earnings in 2024?

17 A. 15,000 a month.

18 Q. 15K a month?

19 A. Rebekah left her job as the president of her
20 company last year, that obviously -- we had -- she had a
21 very -- I don't think I can talk about it, but she got a
22 very nice payout. That eased up a lot of the pressure
23 in that regard.

24 Q. She got a severance or something?

25 A. Yes.

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1 Q. And that's a confidential amount?

2 A. Yes.

3 Q. And the 15K comes from the two clients we
4 previously discussed; is that right?

5 A. Yes.

6 Q. Nothing else, no other sources; is that right?

7 A. That is correct.

8 Q. What about 2023? What were your earnings from
9 2023?

10 A. I haven't done my taxes for '23 yet. I still
11 have to get those out. Not much. I want to say
12 whatever I got paid to finish out the severance plus
13 maybe like two or three months, a month or two of
14 Taxpayers Against Insurance of Bad Faith.

15 Q. And when do you plan to file your tax return
16 for 2023?

17 A. Well, before the end of August. Hopefully
18 September. Hopefully by September 1st.

19 Q. What were your earnings in 2022?

20 A. It would have been the 50 from Ballard every
21 month. That was it. I think I made \$50,000 from one
22 other client.

23 Q. What was the name of that client?

24 A. I don't remember the name of the client, but it
25 was a development issue over in Winter Springs. It

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1 would be an LLC kind of thing.

2 Q. And have you filed your tax returns for 2022?

3 A. No. Those are both getting done right now.

4 Q. Okay. And do you anticipate that one in
5 September as well?

6 A. I hope so.

7 Q. So those two need to be filed?

8 A. Yes.

9 (Exhibit 103 was marked for identification.)

10 BY MR. PERKINS:

11 Q. All right. The next exhibit here would be 103.
12 This is your 2021 tax return.

13 Do you see that up on the screen?

14 A. I do.

15 Q. And on this page we have a reference to the
16 140,217 in income there?

17 A. Yes. It's blocked on my screen, but I can see
18 it on that one.

19 Q. Okay. And that would have come from Ballard,
20 correct?

21 A. Correct.

22 Q. Okay. And then if I go down to page ten of
23 this tax return, here I have this CED Strategies, LLC.

24 Do you see that?

25 A. Yes.

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1 Q. And what is CED Strategies, LLC?

2 A. It's a holding company, LLC, that I have that I
3 have done consulting work over the years and purchased
4 land and other things. Sort of my catchall company.

5 Q. Are you the managing member of that?

6 A. I am.

7 Q. A sole member?

8 A. No.

9 Q. LLC?

10 A. No.

11 Q. Who's the other member?

12 A. Rebekah.

13 Q. Just two members?

14 A. I think we might have -- yeah, I think so.

15 Q. Holding company in the business of doing what?

16 A. Well, again, I do all my principal business
17 through my LLCs. CED Strategies was a mother ship for a
18 long period of time, but it owns a piece of land that is
19 worth several million dollars over in Oviedo. You know,
20 I do consulting in it. I purchased and bought and sold
21 and tracts of land. I bought it from buyers, and sold
22 it to home builders. So that company's, it's been doing
23 many things.

24 Q. And it looks like you have put the severance
25 amount from Ballard, that 450, on your income for CED

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1 Strategies; is that correct?

2 A. I did whatever -- I had the same accountant
3 since 2004, and he had a very massive stroke, was no
4 longer able to function. So I went to -- it's a pretty
5 simple return, so I went down to the -- not Turbo Tax,
6 but the green -- anyway, just a guy in the strip center.
7 So, yeah, whatever -- I gave him all the stuff, and he
8 did it this way.

9 Q. What was the name of the accountant that had
10 the stroke?

11 A. Pop Scott.

12 Q. And where was his location?

13 A. Ormond Beach.

14 Q. And is he still alive?

15 A. I don't believe he's functional. I think
16 he's -- he had a very, very massive stroke; and then
17 after that, he could -- he -- his mind was okay, but I
18 think it was very labored for him when he talked. You
19 see somebody that just struggles. And from what I
20 heard, he had another health incident, but I'm not privy
21 to his current health care.

22 Q. Who is your current accountant that you're
23 working on with your taxes for 2022 and 2023?

24 A. Marcia Babione.

25 Q. And where she is geographically located?

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1 A. Orlando.

2 Q. And will she be filing the '22, '23 tax returns
3 on your behalf?

4 A. Yes.

5 Q. And do you have any idea how you're going to
6 claim the 600,000 in severed payments that were made by
7 Ballard in 2022 on your taxes?

8 A. I do not.

9 Q. What about in 2023, the \$150,000 worth of
10 severance payments? Any idea how that is going to be
11 claimed?

12 A. Again, I'm not an accountant. I hire
13 accountants. I rely upon them for their advice and
14 counsel, and I will rely upon them for their advice and
15 counsel.

16 Q. Do you know why the Ballard payments of 450,000
17 in 2021 was reported on the profit and loss statement of
18 CED Strategies and not your own personal?

19 A. I would -- I rely upon the person who did the
20 taxes, but I think -- and again, I don't know. Probably
21 what I told them was, this was my holding company. It
22 is where all my stuff goes, but that would -- I don't
23 know. I would just follow whatever the accountant told
24 me. There's -- I don't glean a benefit from doing it
25 one way or the other. I don't think there would be some

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1 particular benefit to that.

2 Q. You did have significant losses from CED in
3 2021, correct?

4 A. Yes.

5 Q. So it looks like if you netted it out, then you
6 had 289,649 for an income.

7 Do you see that?

8 A. Yes.

9 Q. When you left Ballard, your monthly draw was --
10 you have two payments of 12,500 twice a month and 25,000
11 a month?

12 A. I don't -- yeah, it was either 25 once a month
13 or 12,500 twice a month. I don't remember. I know we
14 got quarterly bonuses the first of every quarter.

15 Q. And how were you bonuses calculated? Was there
16 some type of objective formula?

17 A. That's what I was telling you about was it's
18 the fee credits. You show up -- I mean, the language of
19 our agreement with Brian basically said that you trust
20 Brian, bring the clients, he is the president, and you
21 sort of -- and the way that would function, Jason, is he
22 would say like, Do you have this, or, Do you need help?

23 And a lot of times, yeah, I can do it, but I
24 just don't feel like dealing with it. So I would give
25 some fee credits to somebody else. And again, Brian had

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1 a very -- I don't think we have ever lost anybody in
2 that firm's history for -- you know, to make more money
3 somewhere else. He is very good about it, very fair,
4 and never had had an issue, never had anything. So you
5 bring in the credits, and it -- listen, there would be
6 some times you'd be like this doesn't seem right. He'd
7 say, Let's break it open, get the paperwork out, and
8 look at all your fee credits.

9 A lot of times -- a few times I was like, Hey,
10 man, I don't think I'm getting paid everything I should
11 be, and then we would find out one of my clients hadn't
12 paid a bill on time or something like that. So there
13 would just be little things like that, but it was very
14 rare. And again, I think in the nine or ten years I
15 worked for the guy, I think we might have had that
16 conversation three or four times. And it was almost
17 always about something that, oh, that's what's going on.
18 There was no -- I mean, he was very fair, and I don't
19 know anyone that has ever worked for him that said
20 anything else.

21 To answer your specific question, it was all
22 done based on fee credits. And a lot of it was -- you
23 know, again, if you signed a contract for a certain
24 amount of money, sometimes he would go to you and say,
25 okay, listen, this is going to take a lot of work.

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1 We're going to give two people \$3,000 worth of fee
2 credits each, but then somehow some way I'd wind up
3 getting some more from somebody. It was just always --
4 it's a bizarre thing. I can just only tell you there
5 was never a problem. It was always very good, always
6 worked well for me.

7 Q. Was there any type of compensation committee,
8 or was it all Brian decided?

9 A. No. And there is no bonuses either. There is
10 no -- I'm sorry, like no end of year bonus, no Christmas
11 gift or anything like that. His thing is you should
12 know what you're going to make based on what your
13 clients are and what your client roster is. It was a
14 very transparent thing. I mean, everybody -- pretty
15 much everybody in the entire firm, if you were working
16 there, you are probably smart enough to know, okay, I
17 have this client and this much in fee credits.

18 (Exhibit 104 was marked for identification.)

19 BY MR. PERKINS:

20 Q. The next exhibit will be the Ballard pay slips
21 here, 104. These were produced by Ballard in response
22 to our subpoena, and I'm just going to walk through your
23 compensation for your history at Ballard here.

24 Have you -- you're familiar with these
25 documents?

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1 A. I'm not.

2 Q. Okay. You're aware that we subpoenaed them?

3 A. Yeah, I know what they're are, but I'm not
4 familiar. I have never seen this document before. It
5 says attorney's eyes only, so I guess you wouldn't give
6 that to me.

7 Q. We can because you're a witness --

8 A. But I'm just saying I haven't seen it which
9 would seem atypical, but I usually read all my
10 paperwork.

11 Q. So we have the -- the way I'm reading this is
12 for 2013, I have 156,000 in which I'll call base
13 compensation and 189,000 in bonuses for a collective
14 total of 345,000; is that correct?

15 A. Well, it should have been 360, so that's the
16 only thing I'm having a bit of a moment with.

17 Q. And why do you say it should have been 360?

18 A. Because I think my guarantee for the first 18
19 months was 30,000 a month. So, yeah, I feel like you're
20 missing a \$15,000 unit in there somewhere, but --
21 because what he would do is I would get my normal 13,000
22 a month, and then in the quarterly bonus I would get
23 whatever the reconciliation was to 90. So it should
24 have been 65, 65 twice a month, and then like a \$51,000
25 hit at the quarter I think. That is how I remember it

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1 being, but it doesn't really -- yeah, it seems a little
2 off but not a lot. It's just that -- from January to
3 December --oh, there's a week -- there is another
4 week -- well, no, because 12/20 would be the end of
5 the -- I don't know what to tell you about that.

6 Q. You think it should be 360 though?

7 A. I'm very sure that's what the deal was. Again,
8 what I don't know is maybe some of this went somewhere
9 else. You know, I think health care was paid for out
10 of -- it's a mystery, I don't know; but, yeah, it should
11 have been 360.

12 Q. Okay. Now, if I go to page 23, here I've got
13 the 2014 returns.

14 Do you see that?

15 A. Yeah.

16 Q. And I have again 156,000 in what I'll call base
17 compensation, and then 134,200 for bonuses, quarterly
18 bonuses.

19 Do you see that?

20 A. Yeah.

21 Q. For a collective total of 292,200. Is it your
22 testimony it was still guaranteed at this point?

23 A. No, it was 18 months that it was guaranteed
24 from, and that started from December 1st -- and my
25 theory behind it was that as a former legislator, I was

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1 banned from lobbying the legislature for the next two
2 legislative sessions. So I think the deal I cut with
3 Brian was at the time -- I think that might have been
4 right before they changed it to -- the session now ends
5 in early March. Back then it was May. So I think my
6 theory was December 1st through May, at that point in
7 time, I should be good, and Brian agreed with that. So
8 it would have stopped in May of that year.

9 Q. So is this an accurate depiction then --

10 A. Yes.

11 Q. -- of your compensation for 2014?

12 A. Again, Jason, I can't speak to that because the
13 first one doesn't look right so I'm not going to warrant
14 that that's all right. It looks generally speaking
15 right because my income went down a little bit because
16 of the expressway stuff.

17 Q. And that expressway stuff was the public
18 records --

19 A. Yes.

20 Q. And then we go then up to 2015 here. I have
21 again 156,000 on page 22 of 35. 156,000 base
22 compensation, \$112,175 in bonuses for a collective total
23 of 268,175?

24 A. Again, '13 and '14 were the expressway stuff,
25 so yeah.

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1 Q. So that sounds right?

2 A. Again, not warranting these numbers are right
3 because the one I have firsthand knowledge of is not
4 right, but it looks ballpark right.

5 Q. Page 21 getting into 2016, it looks like,
6 again, your base compensation was 156, and then you had
7 bonuses of 182,398.59, a collective total 338,398.59?

8 A. Sounds about right.

9 Q. And then in 2017, your income goes up. It
10 looks like for 2019 your salary again.

11 Can you read that?

12 A. No.

13 Q. 156 here?

14 A. Yeah, that would be about -- yeah.

15 Q. And bonuses are \$553,228.64. Do you see that?

16 A. Yes.

17 Q. For a collective total for 709,228.64; is that
18 correct?

19 A. Yes.

20 Q. What happened in 2017 where it caused such an
21 increase?

22 A. I mean, honestly, the more appropriate question
23 is what happened in 2014 and '13 that kind of led to the
24 problem, and it was when you are a member of a lobbying
25 firm and you go through a public investigation, even if

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1 you get charged with a misdemeanor that -- and the judge
2 says in there that you're the first person in the
3 history of the United States of America to ever be
4 charged with this kind of crime as a private citizen, it
5 still takes some time to sweat it off. And there is
6 still people saying, oh, you have to do this.

7 I think it would have been a lot more than that
8 a lot faster if it had not been for the expressway
9 stuff. But the answer is that during the campaign of
10 Ron Desantis, I was very involved. And after he got
11 elected, I was viewed as one of the people in the town
12 who was probably -- I was tasked with leading key
13 negotiations on big things, and with that is going to
14 come a lot more money.

15 Q. Now, when you were involved in this Expressway
16 Authority investigation and the public records issue,
17 did you contemplate resigning from Ballard?

18 A. No.

19 Q. Why not? What was the distinction of what
20 happened here versus what happened with the public
21 records request and the Sunshine law?

22 A. Well, in one of them, there was a misdemeanor
23 charge where they basically said I was more or less
24 conspiring to commit the Sunshine Law which was clearly
25 ridiculous. I mean, it was people who looked at me --

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1 like really people who do not like me are like this is
2 really odd that you would punish someone for this. It's
3 very personal. The guy -- the prosecutor and I, we had
4 a pretty big feud, and I wound up -- he was -- it was a
5 very personal thing, and he is a destructive, horrible
6 human being and did this and charged my wife with a
7 crime which was just complete nonsense and then dropped
8 the charges just a few weeks later. His whole role was
9 just to cost her her job.

10 But, I mean, when you go through things like
11 that, it reflects on you. If you're asking why that
12 wouldn't do it, well, I mean, that was done during the
13 course of my job. I represented HNTB. I had clients
14 who were in the space. So it was a ridiculous claim.
15 I'm sure if it had been a felony or something, it would
16 have been a different outcome, but it was -- you know,
17 it was a misdemeanor charge.

18 It was equivalent I think to like whatever the
19 lowest level of misdemeanor was. I mean, it was like a
20 60 days maximum thing, and -- but it still does damage.
21 Nowhere near as much damage as being accused of being
22 involved in statutory rape does. I don't think I have
23 to explain that, but, I mean, the size and scope of this
24 is much larger. And the Orlando Sentinel and Channel 9
25 caring about this is very different than the New York

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1 Times and the Washington Post and the Wall Street
2 Journal.

3 Q. Who was the prosecutor that brought the --

4 A. Jeff Ashton.

5 Q. All right. Let's go on to 2018 here.

6 A. I thought we were just on 2018.

7 Q. We did 2017.

8 A. Got it.

9 Q. All right. Can you see the 2017 numbers here?

10 A. Sure.

11 Q. All right. And we have a salary of 156,000?

12 A. Yes.

13 Q. And then bonuses of 433,183.30?

14 A. Yes.

15 Q. And then we have a collective total of
16 589,182.30, correct?

17 A. Yes.

18 Q. Does that sound accurate to you for 2018?

19 A. Not to be difficult with you, but, again, it
20 looks about right, but I do not warrant that this is
21 totally correct. The one thing that I do have a
22 firsthand knowledge of I don't think has got it right.

23 Q. And that is the \$15,000 off the first year?

24 A. Yeah.

25 Q. Let's move on to page 11 of this document,

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1 records for 2019. You have a salary of 300,000 there
2 for your draw?

3 A. Yes.

4 Q. And then bonuses of 941,850.35. Do you see
5 that?

6 A. Yes.

7 Q. Does that sound correct for your compensation
8 for 2019?

9 A. Yes, and I was also partner with Brian in a
10 medical marijuana deal and made some money off of that.

11 Q. Was that reflected in this?

12 A. No, it was separate.

13 Q. What was the entity that you were involved in
14 in that regard?

15 A. It was one of the nurseries that became a
16 medical marijuana dispensary.

17 Q. And were you a managing member or LLC member?

18 A. No. I was just a guy that was associated with
19 the governor's office to issue the permits.

20 Q. And how much money did you make off that deal?

21 A. It was several -- I don't remember the exact
22 amount. It got messed up because the price of medical
23 marijuana licenses took a big hit, so a series of
24 factors. But I think the deal that we wound up
25 originally agreeing to contemplated -- again, this is

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1 going to ballpark. I had ten percent of it, so it was
2 going to be like \$18 million cash. \$18 million in a
3 note that was personally guaranteed by the family that
4 was buying it, and then give or take \$18 million in
5 stock, but you couldn't trade the stock for a period of
6 time. So you were awarded stock, but you had to hold
7 it. And at the time, we were awarded -- and please
8 forgive me if I get this fractionally wrong, but I think
9 you'll get the gist. I think the stock was maybe like
10 \$2.15 a share when we got it. But by the day you could
11 actually sell it, it was a penny share. So that lead to
12 a restructuring of the deal because we didn't really
13 want to have anything to do with that, but the people
14 agreed to other things and said they we weren't going to
15 pay us. So we wound up getting out of it. I think I
16 made about two and a half or \$3 million.

17 Q. And in 2019 your base salary went up, almost
18 doubled, correct?

19 A. Yes.

20 Q. It went from 156 to 300,000.

21 A. Yeah, but at the time I was the only lobbyist
22 that was involved in debate prep for Ron Desantis. I
23 was the -- Matt Gaetz was in the middle of his
24 transition. Most -- much of that transition was carried
25 out on my back patio, and we would identify and research

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1 good people for various jobs. And I wasn't involved in
2 all of it, but I was just very involved and had a lot of
3 friends throughout there. So it would have been an
4 optimal, peak earning time for me.

5 Q. And that was your best year ever at Ballard,
6 correct?

7 A. Yes.

8 Q. 2019? If you go to page seven of 35 of the
9 PDF, it looks like your salary remained the same, the
10 base salary in 2020, 300,000, correct?

11 A. Yes. But I remember -- I think this is the
12 year that I got most of the money from the weed.

13 Q. From the marijuana deal?

14 A. Yeah.

15 Q. Okay. And then your bonuses went to
16 406,233.75, correct?

17 A. Right.

18 Q. For a collective total of 706,233.75?

19 A. Again, I can't warrant that. That's -- this is
20 the first time that I have seen this, but it sounds
21 about right.

22 Q. So you had one year over the course of your
23 career at Ballard where your compensation exceeded a
24 million dollars, correct?

25 A. Well, I had commission. I had several years of

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1 it. There is the Ballard W2 money, and then there was
2 the money that came from the deal.

3 Q. From the marijuana?

4 A. And that came in an increment of million, a
5 million, and maybe I think after that there was smaller
6 amounts. I don't remember-

7 Q. Was the marijuana money paid through Ballard?

8 A. Not through the firm, no. Ballard owned ten
9 percent of it, I owned ten percent of it.

10 Q. So it was paid outside of the Ballard payroll?

11 A. Yeah.

12 Q. So strictly looking at the Ballard payroll, you
13 had one year where you made more than \$1 million
14 because --

15 A. Yeah. I would have continued having more of
16 those be it because Desantis was there had I not had to
17 leave.

18 Q. And that year that you made more than a million
19 was 2019, correct?

20 A. That's what the report says.

21 Q. And you understand you're seeking damages
22 against the defendants in this case for \$1 million in
23 wages per year from Ballard?

24 A. I think I would have made more than that.

25 Q. And what's the basis for you to believe that

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1 you would have made a million or more per year after you
2 departed given historically you made a million in one
3 year, 2019?

4 A. Well, the only thing that matters is the
5 governor's administration that your under. Lobbying is
6 a profession. It is about who knows folks that are in
7 or around the scope of power. I was not particularly
8 close with Rick Scott or his administration. I was very
9 close with the Desantis administration. I'm not
10 particularly close with the governor, but I know him. I
11 was very involved in any of the people who are his top
12 folks were friends of mine.

13 I was the guy that recruited the chief of
14 staff, Shane Strum. That was somebody I found and
15 identified who was a good friend. So, I mean, I was in
16 a peek mode. It would be like -- to use an analogy for
17 you, it would be like an athlete who just came out --
18 had a big free agency year, and there was a chance for
19 him to really ramp things up. That is what the Desantis
20 years should have been for me that Joel and his family
21 took away.

22 Q. And who was the person that you were working
23 with in the Desantis administration? Who was the point
24 of contact with you when you were doing this debate
25 prep?

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1 A. Oh, I mean, that was actually just the campaign
2 team. I mean, it was like during his campaign for the
3 governor, 2018. There's a Showtime show called The
4 Circus. You can see yours truly there with Congressman
5 Gaetz and Desantis and other folks from the Ballard
6 firm, Susie Wiles and some of that crew.

7 Q. Is it your testimony then the bulk of your
8 income would have come from working with the Desantis
9 administration had you been staying at Ballard?

10 A. Yes.

11 Q. Any other big, large clients that you would
12 have had the opportunity to generate income from?

13 A. Yeah. When you have good relationships with
14 the governor, people find you. Lobbying is a little
15 different than a law firm. Typically there is many
16 different law firms that do things, but typically there
17 is -- you know, if you were to ask people who are
18 familiar with the process and say, I'm interested in
19 someone here, there is a few schools of thought.

20 One is do you want the biggest? We were the
21 biggest. We were the largest in the state of Florida by
22 a good, large part. We were very close with the Trump
23 administration which made -- I think the last time I
24 checked, I think the last year Trump was president, I
25 think we were like -- we were in top in terms of what

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1 revenues were lobbying for them there. And then Brian
2 would have offices in places like Miami-Dade and in
3 Tampa. I mean Miami-Dade is about the size -- the size
4 of like -- larger than 11 U.S. states. So there is an a
5 huge concentration of revenue down there.

6 And again, Matt -- Brian never validated this,
7 but I think there were people that were making the
8 argument that we were the biggest lobbying firm in the
9 world. By virtue if you take our Tallahassee, our DC,
10 and, you know, our local government offices -- and now
11 they're all over the place. They're literally all over
12 the world. At the time it was just those. They were
13 making the argument it was the largest lobbying firm in
14 the world.

15 So there is a lot of people that just go and
16 say, Okay, we want the firm that is -- we want the
17 people that are close to the governor. That's typically
18 how the search process goes I think for lobbyists. You
19 know, it's not -- people don't use the Yellow Pages.
20 They typically call somebody and say this or there is a
21 few firms. And ours was always one of the -- typically
22 every year I was there, the largest firm in Tallahassee
23 and a huge presence in DC.

24 And so we were very well known to be close to
25 them. I was known to be close to them. And, again, I

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1 placed a chief of staff. I had a lot of friends
2 throughout. I was -- and again, I did well. I mean,
3 the governor's office came to us and said they wanted to
4 settle the marijuana case which is how I became the lead
5 negotiator on that. And when I tell you these were the
6 prime earning years, these were the prime earning
7 years.

8 Q. This alleged ghost political scheme with
9 Jestine Iannotti, have you ever discussed that
10 allegation with Abby Greenberg?

11 A. I don't believe so, no.

12 Q. Have you ever discussed a ghost political
13 scheme with Joel Greenberg?

14 A. No, although he claims we did.

15 Q. He claims that he saw you talking with
16 Mr. Gaetz about that?

17 A. Yes.

18 Q. Do you know -- do you have reason to believe
19 that anyone else published that statement other than
20 Mr. Greenberg, somebody else --

21 A. Sorry, could you ask that again?

22 Q. Do you have any facts or circumstances that
23 another person, another defendant, published that
24 statement that Mr. Greenberg made?

25 A. Published what statement?

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1 Q. That he observed you and Mr. Gaetz having a
2 discussion about a ghost political scheme with respect
3 to Jason Brodeur?

4 A. Well, my -- from what I was told by the
5 journalist, I mean, it was pushed by people who were
6 close to Mr. Greenberg. So if not you, Mr. Wermuth or
7 Mr. Scheller. I mean, just somebody -- or Dave Webster
8 who I came to believe it was. It was all paid for by
9 Greenberg family money. If but for the Greenberg family
10 money, Joel would have very few resources.

11 Instead they have a whole panel of attorneys
12 which fill the screen here and are all dedicated to
13 trying to get their kid out of jail. They don't care if
14 it hurts other people. I do care because it hurt me,
15 and I think they lied about Matt Gaetz. I think that
16 Joel is the person who did these things. I think the
17 Greenbergs would like to spread that blame around. I do
18 not find it noble, and I do think it is wrong.

19 Q. What do you think they lied about Matt Gaetz
20 regarding?

21 A. I don't think that Matt Gaetz ever had sex with
22 an underage person either.

23 Q. You're referring to "AB"?

24 A. I am.

25 Q. Have you discussed that with Mr. Gaetz?

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1 A. Back in the day. Like the first this ever
2 happened, the first I ever heard of this, I said -- he
3 said, No, of course I didn't do that. It was...

4 Q. Was Mr. Gaetz at your house on July 15, 2017?

5 A. I have no idea. He wasn't on the gate log, and
6 I wasn't there.

7 Q. You have never discussed that with him, whether
8 he was there or not?

9 A. I haven't, no.

10 Q. You sat through the deposition of Mike Fischer,
11 correct?

12 A. I did.

13 Q. Mr. Fischer said that Mr. Gaetz was there?

14 A. I saw that, but again, I'm happy to tell you
15 that he said that. The thing about you have to
16 understand how Matt would travel, Matt would kind of
17 use -- he would come into town. He's a congressman.
18 He's constantly doing news skits. He's constantly doing
19 speeches and things.

20 So he would come, be there for a day or two, go
21 off to Tampa, be gone for a few days, come back, be
22 there for a day or two, and then go give a speech in
23 Jacksonville, and he'd fly back. It's just sort of one
24 of those things, just sort of a hub and spoke model
25 where he had all these things going on throughout the

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1 state. So I have no idea. I mean, when Mike Fischer
2 said he was there, I don't know if he was there all day.
3 I don't know if he was there early in the day and left
4 somewhere else.

5 I know Eric Foglesong is on the gate log that
6 day, and I know that Matt Gaetz would never be alone in
7 a house or in a small room with Eric Foglesong because
8 Eric was a preeminent national democratic consultant who
9 just elected the governor of Louisiana. So I know
10 that -- that Matt's -- Matt did not like being around a
11 national democratic consultant. I can tell you that. I
12 see Eric on the gate long too with Fish, so I don't
13 know. The answer is I don't know if he was there. I
14 don't know if he was there when the girl got there.
15 Mike Fischer said he was there, so I would take Mike at
16 his word. I don't know any more than that.

17 Q. Do you remember when I asked Mr. Fischer if he
18 spent the night at your residence, and he said, yeah.
19 He said Matt Gaetz did spend the night at your house --

20 A. Very possible. He could have come and gone.
21 Again, it's not -- he's not on the gate log, so, I
22 mean -- again, you're asking me to determine things that
23 I cannot do. I was not there.

24 Q. When you returned to your house on either July
25 15th or July 16th, was Mr. Fischer there?

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1 A. I don't remember. I have no idea and like --

2 Q. And he has cerebral palsy?

3 A. He has cerebral palsy.

4 Q. So he struggles to go up stairs, right?

5 A. Mike has -- he struggles to go up stairs. He
6 had to have a hip replacement. Prior to this he was
7 in -- I mean, Mike is a labored walker. He -- to watch
8 him walk out to the car is not an easy task for him. So
9 I do not believe he ever went upstairs. I'll put it
10 that way.

11 Q. When Mike would come to your house and stay the
12 night, where would you put him? Did you have a
13 downstairs bedroom?

14 A. Mike sleeps on the couch at his own house, and
15 I think he'd sleep on the couch at my house. It was
16 just basically what he would do. He would just -- he is
17 one of those guys that when he decides it's time to go
18 to bed, he would throw a pillow on there and he'd fall
19 asleep. It didn't matter if he had to turn the TV or
20 anything. It's sort of how he works.

21 Q. Do you have a downstairs bedroom at the
22 Dorworth residence?

23 A. I don't now, but I think I might have then.

24 Q. Back in the summer of 2017?

25 A. I wish I could tell you. I have lived there

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1 for 19 years now. I don't -- I think it was an office
2 back then, so don't think -- I believe it was -- I don't
3 believe we had a bedroom back then. So he probably
4 would have been on the couch. I think if you gave Mike
5 Fischer a room at the Four Seasons, he would rather
6 sleep on the couch. It's -- at his home, he sleeps on
7 the couch. I think from a logistics point of view, it's
8 easier than getting in a bed, getting out of the bed and
9 all that stuff.

10 Q. Is there a couch on the first floor back in the
11 summer of 2017 that was kind of away from the pool area
12 and the game -- air hockey table that you could have
13 some quiet time?

14 A. The air hockey table was in a room, and there
15 was no chairs or tables in that room. There would have
16 been two couches, very uncomfortable couches, in the
17 living room, and then probably -- yeah, a -- two chairs
18 and a couch in the -- I think it's still the same thing
19 I have now. Yeah, so there would have been -- no very
20 comfortable couches, but Fish wouldn't have cared.

21 Q. Let's go back to the ghost political scheme
22 here and Mr. Brodeur and his 2020 election against
23 Patricia Sigman.

24 Did you assist Mr. Brodeur at all in that?

25 A. No.

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1 Q. No monetary donation?

2 A. I might have gave him a check. Like -- again,
3 I don't mind telling you. I don't expect my friends'
4 problems to become my problems. That's one place I
5 differ greatly from Joel. But at the time, I was part
6 of a very contentious lawsuit. There was a part of a
7 development was trying to basically make a plan and
8 annex it so I could -- annex it to Oviedo.

9 I had the press on me every day. I was --
10 there were Facebook chat groups that were designed to
11 talk about what an evil bastard I was. So Jason and I
12 would have -- I had a pretty simple understanding of I
13 was really not what you need around your campaign right
14 now and let the professionals do it. That would just be
15 how a conversation like that would work.

16 Q. So you didn't do any fundraising for Jason or
17 any assistance for the campaign?

18 A. I don't think so. Listen, we are -- it is a
19 fair statement to say that Jason and I are very known to
20 be friends. There is probably nobody I could call that
21 Jason couldn't call himself. Jason has a very highly
22 accomplished fundraising team. If you told me that I
23 told somebody that Jason was great and he'd be awesome
24 in the senate and please help him, I would not be
25 surprised. I probably did that. I probably did that

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1 with my firm. I probably did that with a bunch of
2 things. I'm a hug backer of Jason Brodeur because I
3 think he's a wonderful human being. He's a great state
4 senator. So I -- all I was doing was not trying to have
5 any of my unpopularity from the fact that I was trying
6 to do a land deal hurt him in his senate race.

7 Q. And that land deal was River Cross?

8 A. Yes, sir.

9 Q. All right. I think lunch is here. Let's take
10 a lunch break. It's 12:10?

11 THE VIDEOGRAPHER: If there are no objections,
12 going off record. The approximate time is 12:10
13 p.m.

14 (A break was had.)

15 THE VIDEOGRAPHER: On record with media unit
16 three. The approximate time 12:45 p.m.

17 BY MR. PERKINS:

18 Q. All right. Back on the record, Mr. Dorworth,
19 for the afternoon session here. A couple follow-up
20 questions I had.

21 When you resigned from Ballard Partners, was it
22 because of the allegations of sexual misconduct or the
23 ghost political scheme or a combination of both? What
24 was the rationale?

25 A. If there was only the ghost political scheme, I

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1 would not have quit. That was what was reported; but, I
2 mean, again that was after I spent hours on the phone
3 with her deploying quite literally ever tactic I could
4 to persuade her that I had never met this woman, and any
5 allegation of this was not true because I viewed just
6 the mere publishing of that as being -- we'll call
7 irrevocably damaging to happen in that paper, that
8 subject material especially with Matt Gaetz there.

9 So the answer to the question is the sexual
10 stuff is the thing that was damaging. The other thing
11 was enough where, I mean, again, if that was all there
12 was, there's probably ways I could have maybe taken a
13 leave of absence. There is other things that would have
14 taken the place of just having to completely fall out.

15 So it was the sexual stuff that was the most
16 important stuff. That was just the one that they landed
17 the punch on because they had some allegation, and I
18 don't know what that was in the form of. I don't know
19 what that was. I don't know what Katie Benner had. But
20 if you read the article, she said that she had some, you
21 know, knowledge or somebody was accusing me of saying
22 that I was discussing a third-party candidate with Matt
23 Gaetz which just never happened. That never happened.
24 It was falsified. They made it up just trying to tag
25 people, as many as they could, because as Mr. Scheller

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1 has said to the press on multiple occasions, their goal
2 was to get as many convictions as the can against
3 people. Really, I don't -- there has been very little
4 concern that people might be hurt who are not guilty.
5 That's been their public stated perspective, and I
6 think -- I spent the entire time, and that's just what
7 you deal with. And so if it had just been the third
8 party thing, I don't know that I would have resigned. I
9 might have taken a leave of absence; but the reality is
10 I added together and made it an easy choice.

11 Q. Did you discuss the sexual allegations with
12 Mr. Ballard?

13 A. I did.

14 Q. You alerted him that you were being accused of
15 statutory rape?

16 A. I did.

17 Q. Okay. Was there a press story around this time
18 of you being accused of statutory rape?

19 A. No. I mean, I was able to hold it -- I had
20 five to six phone calls a day, a whole lot of threats, a
21 lot of righteous indignation because I had never met
22 these people. And again, what I basically had to do was
23 every single time is I had to present a case of this is
24 what Joel Greenberg's in jail for. This is what he did
25 with Brian Beute at Trinity Prep trying to cause a

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1 political opponent of his to do -- to have problems.
2 This was a text exchange where he tells me that -- you
3 know, basically says, Hey, everyone is going to need
4 lawyers. To which I say, Why would I need a lawyer? I
5 don't know these people. I have never known these
6 people. Why would I have anything to do with that? So
7 I would have to present this information to them to say
8 like, Listen, I don't -- Joel here says I -- says you've
9 doing nothing wrong. He's clearly trying to threat to
10 say I'm going to -- I'm making this happen. By him
11 telling, Everyone is going to need lawyers, that was his
12 way of saying that he -- he was going to tell everybody
13 whatever he had to say to save his skin.

14 Q. Is it your testimony that the primary reason
15 you resigned from Ballard Partners is because of these
16 sexual allegations between you and "AB"?

17 A. I mean -- can you please repeat that question?

18 Q. Is it your testimony that the primary reason
19 that you resigned from Ballard Partners is because of
20 the allegations of sex between you and "AB"?

21 A. The primary reason for my resignation from
22 Ballard Partners was the fact that I was being dragged
23 into something that I had nothing to do with; but, yes,
24 did it include sex with "AB", that that would implicate
25 me into a great many other things just to claim that I

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1 was -- just to stir up the investigation in the first
2 place in some sick attempt to like save your own -- it's
3 just really disgusting behavior, but I think Joel did
4 it, and I think he did it with the funding of his
5 parents and with Greenberg Dental.

6 Q. Was there ever a story in the press that you
7 had sex with "AB"?

8 A. Yes, during the Daily Beast.

9 Q. When was the first time that you read an
10 article about you potentially having sex with "AB" as a
11 minor was reported to the press?

12 A. I don't know the date.

13 Q. But it was the Daily Beast?

14 A. I believe so, yes.

15 Q. Any other media outlets other than the Daily
16 Beast --

17 A. Yeah, I mean, there is some -- I'm sorry to cut
18 you off there. I thought you were done and you had a
19 little bit more of a question there. Just following the
20 rules. Just following the rules and just making sure
21 that we were good.

22 Q. Yeah, you talked about the Daily Beast, and I
23 was saying any other media outlets that would have
24 reported that you had sex with "AB" other than the Daily
25 Beast?

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1 A. There are a series of websites, things like
2 republicans, where they target republicans who've been
3 involved in scandals of a sexual nature. My name shows
4 up a few places; but, I mean, we have been very
5 judicious about protecting it despite the Greenberg
6 family's best wishes. We were able to -- despite a lot
7 of it -- you know, again, I believe that he's -- what we
8 know from the interrogatories is that Joel told "AB" to
9 come -- go to this attorney's office. The bill has
10 already been taken care of.

11 We know he went to that office. Laura Wolf
12 would not let "A" shed any light as to what information
13 was given there. So -- and I believe very early on that
14 Joel -- he told me, he said, I'm having to pay for their
15 lawyers. He said that. And, you know, listen, I think
16 that I have had a chance to review the professional work
17 of "AB." I can tell you there's really nothing she
18 won't do for \$1,000. And it is some of the most
19 disgusting, depraved things I have ever seen in my life.

20 And I think that Joel Greenberg told her,
21 Listen, sue them. You'll make money. And there is
22 evidence to support that too because in the jailhouse
23 letter that -- I think his name is Vladimir St. Louis I
24 believe his name was. He was the guy that was in the
25 cell next to -- or he was with Joel when they were

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1 transported in from the jail for one period of time. I
2 think we provided this letter to you, so it should be in
3 there, but he basically -- Joel in that letter said,
4 Yeah, these guys really didn't do anything. And he
5 said, They'd do the same thing to me if the shoe was on
6 the other foot. I just think Joel is a real degenerate
7 piece of garbage. I would never find myself in that
8 position, and I would sure as hell never lie about
9 people to save my own skin especially if I did as much
10 bad stuff as Joel did.

11 Q. Do you know how many times the Daily Beast has
12 reported that you had sexual relations with "AB" as a
13 minor?

14 A. I think once or twice. Twice maybe. I don't
15 know. No, I don't. The answer is I do not know off the
16 top of my head.

17 Q. Once or twice?

18 A. A couple times. It might be more. I try not
19 to dwell on the press. It's an unfortunately part of
20 life because of the Greenberg family and the things that
21 they have done, I have to deal with this. I mean, it's
22 not something -- I don't spend a lot of time on my
23 Google search right now.

24 Q. Can you give ballpark timeframe for when that
25 occurred, when they published a story about you having

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1 sex with --

2 A. You'd have to look it up. It's on the
3 internet. I don't know what it was.

4 Q. And is it your testimony that Jose would have
5 been the author of those?

6 A. I think it was Jose and another guy too. Chuck
7 Sollenberger -- Roger Sollenberger. Absolute scumbags.

8 Q. All right. I want to transition now to the
9 events of June 21, 2017. You're aware that the
10 allegations are that there was a hotel interaction
11 between you and "AB" on or around June 21st or June
12 22nd? Are you aware of that?

13 A. I'm aware of that.

14 (Exhibit 105 and Exhibit 106 were marked for
15 identification.)

16 BY MR. PERKINS:

17 Q. I'm going to mark some exhibits here that I'm
18 going to be using frequently and going to put them up on
19 the screen as well, but I think it's helpful to have
20 Exhibit 105 which is the Heathrow gate ledger and in
21 everybody's hands here. And also the Wells Fargo
22 checking records I have marked as 106, Mr. Dorworth.

23 And you're familiar with the gate ledger,
24 correct?

25 A. I am.

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1 Q. All right. And the -- I'll pull it up for the
2 folks at home so they can kind of see what they're
3 talking about here. On Exhibit 105, the Heathrow
4 ledger, I want to turn to page five of ten of that
5 document. We're at June 21st there. And the first
6 entry there is at 2:35 in the morning.

7 Do you see that?

8 A. It is.

9 Q. Okay. And there is a reference there to a
10 license plate tag number of HKXOR.

11 Do you see that?

12 A. Yes, I do.

13 Q. Is that the tag for your Cadillac?

14 A. Not anymore, but it was.

15 Q. When did you switch tags?

16 A. I don't know. On my birthday a couple years
17 ago.

18 Q. Okay. But in the summer of 2017, that was the
19 tag for your Cadillac, correct?

20 A. Yeah.

21 Q. Okay. Now, at 2:35 a.m. you were coming into
22 the community. Is it true that you were coming in in
23 all likelihood from a trip to Highlands?

24 A. Yeah. There is some confusion, but I think
25 that's what happened. I think we -- my wife was very

1 pregnant at the time -- well, she was four months away
2 from giving birth, give or take. And until her last
3 trimester, she would frequently get sick. She would
4 get -- she would throw up. I don't know what other way
5 to put it. So a lot of times what we'd try to do is
6 we'd try to drive at night when there is less traffic.
7 Just easier on her.

8 Q. All right. And so in that vehicle at 2:35 a.m.
9 would have been Rebekah Dorworth, [REDACTED], and [REDACTED]

10 A. Yes, and probably more people. Probably
11 [REDACTED], probably [REDACTED] -- although I
12 don't -- yeah, probably [REDACTED] because I see [REDACTED]
13 on the 23rd. They were my kids' friends.

14 Q. Okay. So [REDACTED] was your son's
15 friend?

16 A. Yes, and a kid named -- a guy named [REDACTED]
17 [REDACTED] was there too I believe. I think he was there.
18 I'm pretty sure.

19 Q. And they would have all been riding in your
20 Escalade?

21 A. Yes.

22 Q. Okay. So we have Rebekah, yourself, [REDACTED],
23 [REDACTED] [REDACTED], [REDACTED], and [REDACTED]
24 [REDACTED]?

25 A. Probably, yeah.

1 Q. Okay. And were **REDACTED** and **REDACTED** your son's
2 age?

3 A. Yes.

4 Q. And then **REDACTED** was your daughter's age?

5 A. Yes.

6 Q. Okay. And if I -- if we look at the Wells
7 Fargo records that I have marked as Exhibit 106 and I
8 will pull those up on the screen as well here, and these
9 are your Wells Fargo records, correct?

10 A. Yes.

11 Q. Is that just an account that you have access
12 to, **REDACTED** ?

13 A. No. It's my --

14 Q. Who else had like a card and access to --

15 A. Rebekah and I both.

16 Q. Okay. So it would just --

17 A. Actually maybe not. I don't know which Wells
18 Fargo. I don't know if she had a card or not.

19 Q. Because it just says your name here on the
20 first --

21 A. Very possible. Again, I don't know. We were
22 married at the time. We might have migrated to another
23 bank shortly thereafter. I don't know.

24 Q. And on page eight of this document, there is a
25 reference there up on the screen. You can see it. I

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1 have highlighted it to this Furman on -- the entry is
2 for June 19th.

3 Do you see that?

4 A. Yeah. That was several days before. We took
5 my daughter on a campus tour for Furman.

6 Q. Okay. So you went down to Furman and looked
7 at --

8 A. And from there, we probably went over to Mellow
9 Mushroom Pizza.

10 Q. I see an entry for Furman, and then I see an
11 entry for Greenville, South Carolina Mellow Mushroom.
12 Furman's in Greenville, correct?

13 A. Yeah. Total separate trip. My daughter was 16
14 years old at the time, was evaluating where to go to
15 school we went and did a day campus tour of Furman, and
16 then we went and got some pizza. Then I went back, and
17 I think that was several days before anything else
18 happened.

19 Q. So Furman and Mellow Mushroom would have been
20 the same trip?

21 A. Yeah -- no, no, no. Two days before. I mean
22 again --

23 Q. 6/19 --

24 A. My house is approximately, I don't know, an
25 hour and a half away from Furman in North Carolina. So

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1 when we just woke up, took a day trip. I think we had a
2 preset tour, say, like maybe some period of time. We
3 went there. We spent two or three hours looking around,
4 went and got some food, and came back and spent at least
5 a day, I think two days, and then headed -- I think we
6 had the back the 20th. So there was a block back at my
7 house in North Carolina between 6/19 and 6/20 when we
8 left.

9 Q. Okay. So you went to Furman and went back to
10 the house in the Highlands; and then from the Highlands
11 house you departed to Lake Mary?

12 A. Yes. That's what it looks like based on the
13 gas receipts. I truthfully -- I mean, you have to
14 understand. This was seven years ago. I don't have any
15 particular recollections of this trip home, but I can...

16 Q. I see two entries here for Valdosta, Georgia.
17 Do you see that?

18 A. Yeah.

19 Q. Okay. And that's on 6/20 for the Raceway Gas
20 Station.

21 Would you typically go through Valdosta to get
22 home?

23 A. There is multiple ways home, and I usually do
24 it based on GPS. But Valdosta is I believe the route
25 the I75 way. So that would be the way we take about 95

1 percent of the time. The reason -- if we go any other
2 way than that it's probably because there is horrible
3 traffic in Atlanta.

4 (Exhibit 107 was marked for identification.)

5 BY MR. PERKINS:

6 Q. The next exhibit will be 107. This was a
7 spreadsheet that was shown to your wife in the course of
8 her deposition.

9 Do you recall that?

10 A. Yes. I'm not going to be real helpful on this
11 stuff because I just don't remember license plates. I
12 remember HKX was mine. I couldn't tell you what any of
13 my kids are or ever was. I couldn't tell you anything.
14 So I don't know.

15 Q. Right. I was going to ask if you recognize
16 **REDACTED**?

17 A. I do not.

18 Q. **REDACTED**?

19 A. No. But that -- I do think Rebekah had -- for
20 some period of time she got hit, rear-ended on I4 I want
21 to say, and that might have been a rental car because
22 hers was in the shop for a period of time. I think it
23 was around then. If I found out that was two years
24 before or after this, I wouldn't be shocked, but I
25 suspect that that might be it.

1 Q. What about [REDACTED]?

2 A. I have no idea.

3 Q. And there was some discussion in the course of
4 your wife's deposition about why she doesn't appear on
5 the --

6 A. Yeah.

7 Q. -- ledger from June 8th to August 17th.
8 Do you recall that line of --

9 A. I do.

10 Q. Okay. And do you have any insight on that?

11 A. Yeah. We got our things back on my birthday,
12 July 17th. So the final 21 days we were gone, and I
13 think she was just gone. She was up in North Carolina
14 doing stuff or work or whatever -- I think you asked her
15 all those questions as to where she was. I just think
16 she was out of town. It wasn't -- this year I think she
17 was gone for six or seven weeks. It is not atypical for
18 Rebekah to pack up and go to North Carolina during the
19 hot part of the summer.

20 But, I mean, I think to answer your specific
21 question, I think that the situation was remedied on or
22 about my birthday, July 17th. So the -- her not showing
23 up on the log for a few days ahead of that really
24 reflects the fact that I think she was in Dallas for
25 IBTTA or whatever conference she was at. She was simply

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1 not in town. But my wife -- since we have been
2 together, we've never been separated. We have never
3 been -- there has never been anything like that.

4 Q. She's in North Carolina or home --

5 A. The temperature in Highlands, North Carolina
6 never goes above 80 degrees over the summer. It's
7 average daily temperature is -- the highest one is in
8 mid July and it's 79 degrees. It's much more pleasant.
9 She likes to go and get far away. Take the dogs and
10 just go spend time up there. I suspect that's what she
11 was doing this summer.

12 Q. Now, let me ask you, you mentioned that trip to
13 Dallas, Texas on the weekend of July 15, 2017?

14 A. Yes, sir.

15 Q. On that Saturday morning, did you take her to
16 the airport?

17 A. I don't know. Probably.

18 Q. Okay. Was it typical for you to take her to
19 the airport when she would travel?

20 A. It was unless she was coming back at some
21 bizarre time. Rebekah is a -- she will make travel
22 decisions I don't make, and sometimes, for example, she
23 has to fly out at 5:00 in the morning, she'll say, I'll
24 drive. Although the last few times I wind up driving
25 her; but, I mean, I would say as a general policy it was

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1 probably the case. This was for work travel. She could
2 have written it off. We as a couple typically take each
3 other to the airport. So I don't know the answer to
4 that question, but it's probable.

5 Q. And if you went to the airport, and I was going
6 to look at like Epass receipts or something like that,
7 would you have taken the 417 to the Beeline?

8 A. So where I live in Heathrow, based on just a
9 very small permutation of traffic, it routes you down I4
10 to 408 to 436 to 417 all the way around. So depending
11 on when her flight was, depending on if it was rush
12 hour, I would likely have pulled my GPS out and made a
13 decision based on that. So the answer is it could be
14 either way. I suppose in either one of those scenarios
15 that would probably likely reflect some Sunpass because
16 the 417 requires it. And if I went down the 408, it
17 would have been on there too.

18 Q. Now, after you dropped her off at the airport,
19 is that when you would have gone to meet with
20 Mr. Morris?

21 A. I have no idea.

22 Q. And done the boat trip?

23 A. Typically -- I mean, it was summer in Orlando
24 or Winter Park, so it would be brutally hot. Randy is a
25 little older. We typically would probably -- I think --

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1 the impression I got from my photo was probably right
2 about the time when we got on the boat is probably about
3 when I did that. And I think, if my memory serves me
4 correctly, I also went to Publix that day or something.
5 I think that was in July.

6 Q. Yeah, there is a Publix entry on there.

7 A. Yeah, and that was probably me picking up the
8 fried chicken at the Publix.

9 Q. All right.

10 A. But it's in Maitland right next to his house.
11 So I would have gone there first, to answer your
12 question.

13 (Exhibit 108 was marked for identification.)

14 BY MR. PERKINS:

15 Q. All right. And I'm going to mark another
16 exhibit which is a summary of the Wells Fargo billings.
17 I'll mark that as Exhibit 108. I'll bring that up on
18 the screen now for -- I've got the summary up on the
19 screen here. And if I look at June 30th, it looks like
20 there is a trip up to Darien, Georgia.

21 Do you see that?

22 A. I have no idea.

23 Q. And this is a summary of your Wells Fargo
24 records.

25 A. My guess is that's probably like driving down

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1 the highway, got to get gas, pull off, and get some. So
2 I have no idea where Darien, Georgia is.

3 Q. Okay. And then I see another entry there for
4 the Highlands, North Carolina, and McDonough, Georgia.

5 Do you see that?

6 A. Yeah.

7 Q. So it looks like there was another trip back up
8 to the Highlands.

9 A. I dont' know where McDonough, Georgia is but I
10 can tell you sometimes when we go to Highlands, I will
11 drive down into Georgia to go to Walmart or to go to
12 grocery shopping. So I don't know where McDonough,
13 Georgia is. But, I mean, again, what I would assume is
14 all of those things are like just me pulling off the
15 side of the road to get gas if I need gas.

16 Q. Do you recall going back up to the Highlands
17 after --

18 A. All the time. All the time. I mean, like it
19 is a -- if we can get four days, we'll go. Sometimes we
20 fly, sometimes we drive. Rebekah was pregnant, so we're
21 probably not flying. The drive does make this much
22 worse. It is an eight and a half-hour drive. We have
23 dogs, kids. It's just all manners of things. I guess
24 at the time the kids were a little older, so yeah, we
25 would run back and forth all the time. And still do.

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1 Q. I'll represent to you that Darien is on the
2 coast. Darien, Georgia is on the coast like near
3 Savannah area.

4 Have you ever gone up 95 --

5 A. Oh, yeah. There is really -- there's -- the
6 fastest way -- and again, I have owned the place now for
7 eight years, so I can speak to this. But if you pull
8 your phone out right now and type in my house address in
9 North Carolina, you're probably going to get routed
10 through -- you go up 95 'til you get to I16. You go
11 over I16, and then you just get off the road and you
12 sort of drive north like at a diagonal up through the
13 gut.

14 You go through Clemson, and then you get to
15 drive up the mountain to get to my house. It says it's
16 faster, but in practice, you know, I find that eight and
17 a half hours on a highway tends to go faster than eight
18 and a half hours involving back roads. And I also had a
19 little spin where I got speeding tickets. I never get
20 speeding tickets and I got two on that trip -- on that
21 road. So I don't -- I mean, yeah, we go that way. It
22 happens.

23 Q. Is it possible that you went back up to your
24 house in the Highlands from June 30th to July 8th?

25 A. Sure. Actually, probably likely.

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1 Q. For the Fourth of the July holiday?

2 A. That's our big one up there.

3 Q. There was some discussion in your wife's
4 deposition about the weekend of July 22nd --

5 A. Yep.

6 Q. -- and partying at your house --

7 A. Yes.

8 Q. -- that weekend.

9 Do you know where Rebekah was on the weekend of
10 July 22nd?

11 A. I think she might have been in North Carolina.
12 I watched the deposition on this. I mean, Rebekah was a
13 very prominent woman. She would -- often had to travel
14 for work. I typically would know where she was going,
15 but I didn't ask a ton of questions. You know, she
16 was -- proprietary work, and we were not -- it was --
17 so, I mean, when -- and then I think around the same
18 time her sister was getting married. So I think they
19 had their bachelorette party at the house in North
20 Carolina. So I don't know which ones I was at and which
21 ones I wasn't, but if my credit card was there I was
22 probably there.

23 Q. Were you at the party at your house on July
24 22nd?

25 A. Yes.

1 Q. And were you there when K [REDACTED] I [REDACTED] and I [REDACTED]
2 P [REDACTED] got in a fight and knocked over a vase?

3 A. I was not -- I was asleep for that. I woke up
4 because K [REDACTED] I [REDACTED] got upset and stormed out with a
5 friend of mine's cell phone.

6 Q. And she took Brady Benford's cell phone?

7 A. Yes.

8 Q. Do you know why she took Brady's cell phone?

9 A. She thought it was Joel's. K [REDACTED] was -- I only
10 met K [REDACTED] once, but she was very loud and very
11 boisterous, but I think she was very much in love with
12 Joel Greenberg.

13 Q. Were you sleeping at the time they had this
14 fight?

15 A. I never saw I [REDACTED] P [REDACTED] so -- I [REDACTED]
16 P [REDACTED] was it?

17 Q. I [REDACTED] P [REDACTED]?

18 A. I have --

19 Q. Blonde.

20 A. I have never -- I don't -- I was not there for
21 that, but I remember waking up because she had left, and
22 Brady was particularly not pleased that his phone was
23 gone. And it was like 4:30 in the morning, and I had
24 been sleeping for probably five or six hours.

25 Q. Did you -- when the fight happened, did you

1 kick everybody out and say, Party's over?

2 A. Yes. That was the end of the party. And by
3 the way, I really -- there are more people at this table
4 than there were at the house. I mean, it's not really
5 like a party. It is a I had some friends in town. I
6 don't even know how I [REDACTED] and K [REDACTED] -- I don't know
7 anything about that. That is the first I ever heard
8 that until now, and I don't remember any vases getting
9 broken either.

10 Q. You just remember K [REDACTED] I [REDACTED] taking the cell
11 phone of Benford?

12 A. Well, to be very specific, she had just left
13 with the cell phone, and I think Brady came to wake me
14 up to say, I think some girl stole my cell phone. I
15 said, Which girl? He said, K [REDACTED] I [REDACTED]. I said, I don't
16 know who that is. He said, It was the brown-haired one.
17 And I think gone Joel had gone home, and she got pissed
18 off, or I don't even know. I mean, I was...

19 Q. And who else was there? It was Brady Benford,
20 K [REDACTED] I [REDACTED]. M [REDACTED] Z [REDACTED] was there?

21 A. Again, I never saw M [REDACTED].

22 Q. Never saw M [REDACTED]?

23 A. No.

24 Q. Who did you see there on the 22nd?

25 A. I think I went to bed around 8:00. I mean, it

1 was -- on a day of intense day drinking, I'm not -- I'm
2 going to be asleep pretty early. I figure that was the
3 case that day. So I think probably about the time the
4 sun went down, I was out.

5 Q. So the only people you can recall are Brady and
6 K^{REDACTED}?

7 A. Yes. And I think maybe Eric Foglesong, but I
8 don't know.

9 Q. How many times has K^{REDACTED} I^{REDACTED} been to your
10 house?

11 A. I just think the one time. Any more than that
12 would be news to me.

13 Q. Were you involved at all in getting the phone
14 back from K^{REDACTED}?

15 A. She FedExed back.

16 Q. Did she have some type of letter in that FedEx
17 package?

18 A. Yes.

19 Q. And was that a love letter of some kind?

20 A. I don't know.

21 Q. Did you read it?

22 A. No.

23 Q. Do you know who the letter was addressed to?

24 A. Joel.

25 Q. Did you deliver that letter to Joel Greenberg?

1 A. Yes.

2 Q. Okay. How did you deliver it to him?

3 A. Take your fucking letter, and don't ever do
4 this at my house again. I was like, Please, Joel, do
5 not bring your crazy shit into my life, were my words to
6 him.

7 Q. Was it your understanding that Joel Greenberg
8 is the one who brought K [REDACTED] to that party?

9 A. Yes.

10 Q. And where did you get that understanding?

11 A. Well, the fact that she got so upset and
12 stormed off and took his cell phone was a large
13 indication of that.

14 Q. Where is the master bedroom in the Dorworth
15 residence? Is it upstairs?

16 A. Yes.

17 Q. Do you keep that locked so the guests don't go
18 in there?

19 A. Yes.

20 Q. How many other bedrooms do you have upstairs in
21 the Dorworth residence?

22 A. Five.

23 Q. Five bedrooms plus one for the master for a
24 collective total of six?

25 A. Yes.

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1 Q. In the summer of 2017, did you own a limousine?

2 A. I think I still had it then. I stopped --
3 basically Uber killed the limousine business like any --
4 it was so much cheaper just to go via Uber especially in
5 the early days of it. The limousine was fine, and we
6 used it for a couple years; but every single time we
7 used it, it would cost several hundred dollars to get it
8 up and running. It's like an old boat on steroids, and
9 so we had it for several years where I don't I think
10 even registered it anymore. We just kind of kept there
11 and then finally sold it.

12 Q. When did you buy the limousine?

13 A. 2013.

14 Q. And what year did you sell it?

15 A. I don't know. 2020. I don't know, it was
16 years ago. Like I said, I didn't drive it for about the
17 last two years of its ownership, so I don't know. I
18 mean, it was -- I don't think it was even operational
19 around this time. It might have been, I don't know.
20 That would be very near the end.

21 Q. And you sat through the deposition of the
22 Heathrow Master Association person, correct?

23 A. Yes.

24 Q. How many permanent transponders did you have
25 back in the summer of 2017?

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1 A. Zero.

2 Q. Because they took them?

3 A. We had a dispute over things, and the way they
4 would sort of effectuate their displeasure with their
5 people is to turn off your transponder. I think that's
6 supposed to incite some sort of response. And I just
7 said, All right, well, do that. I mean, it was no big
8 deal, and they -- I don't -- it wasn't -- it was just --
9 again, we sued them. And the guys at the gate are
10 really nice at the neighborhood. The lady up front, she
11 was -- she -- she's an unpleasant human.

12 Q. Did the guys at the gate, did they just ever
13 waive you through without checking your credentials?

14 A. They'd lose their job if they did that. They
15 take it very seriously.

16 Q. So it's your testimony that every time they
17 would take down your name and your tag number when you
18 went through the gate?

19 A. It's my testimony that every time I went
20 through, they would take some -- they would go and type
21 things on the computer and say -- and I couldn't just
22 pull up. There was a few times that over the time this
23 would go on there would be a long line, and I would just
24 pull up to the front of it and they'd still go get my
25 phone and -- they'd still do the thing and type it in

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1 there. And they were not just -- it was real serious.
2 I mean, like that neighborhood takes security very
3 seriously. It's one of the things I like about it.

4 Q. When you got your transponder privileges back
5 on your birthday in 2017, how many transponders did you
6 have?

7 A. I don't know.

8 Q. You had one for your Porsche?

9 A. Well, I mean, I had one for the car. But it
10 might have been --

11 Q. You had a Porsche --

12 A. But you're asking on the day I got -- I don't
13 know if I got them back that day or what. I don't know.

14 Q. In the summer of 2017 --

15 A. Yeah, I got -- all my cars got their
16 transponders back that summer.

17 Q. Your Cadillac had a transponder?

18 A. Yes.

19 Q. Your Porsche had a transponder?

20 A. Yes.

21 Q. Rebekah's vehicle had a transponder?

22 A. Yes.

23 Q. And then did you have a mobile one that
24 could --

25 A. I did not have the Porsche yet. I didn't get

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1 the Porsche until -- I didn't get the Porsche until I
2 think 2018. So there was no Porsche, and I think that
3 the Cadillac had a mobile one. Maybe not. I don't
4 know. It had a transponder.

5 Q. The Cadillac had a mobile --

6 A. I don't know that I ever got on the
7 transponder. I think by the time that happened, I'm not
8 sure I ever took the Cadillac again. So I think when
9 they went down, I never got a replacement transponder
10 because they were like 50 bucks a piece. If you're not
11 going to use it, you wouldn't just...

12 Q. Did the limo have its own transponder?

13 A. I don't remember. It did with a question
14 whether it was the mobile one or whether it was embedded
15 in there, I just truthfully don't remember that.

16 Q. But you had probably four transponders amongst
17 and between the different vehicles?

18 A. Probably.

19 Q. When your transponders were deactivated, did
20 you ever use the transponder of a friend or a
21 neighbor --

22 A. No.

23 Q. And you had two drivers for the limo, Jeff
24 Onest and John Trion; is that right?

25 A. Yes.

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1 Q. When did Jeff drive for you?

2 A. He was the first -- I mean, the two of those
3 guys never drove at the same time. I knew Jeff from
4 political stuff. Jeff -- I don't remember exactly when
5 he -- I'm sorry, Jason. I can't help you with the dates
6 on this. He was the first guy for a couple years, and
7 the rest of that was John. But I couldn't tell you with
8 any specificity whatsoever when that was.

9 Q. Would you have taken a limo to go meet
10 Mr. Morris?

11 A. No.

12 Q. Would you have taken an Uber?

13 A. No.

14 Q. You would have driven your Cadillac?

15 A. Well, I would not have -- I might have taken an
16 Uber home, but I was not -- I mean, listen, I think the
17 sort of highest end of the pyramid of people who are
18 responsible when drinking and driving is people that
19 Uber out and then Uber home. I am more of the type that
20 with drive and then Uber home. I'm not a big drunk
21 driver. I think it's -- the odds are -- you getting
22 having a problem sooner or later are just such that I
23 wouldn't do that, but I don't know that I would -- take
24 an Uber there. I might take one back.

25 Q. Do you have an Uber app on your cell phone?

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1 A. I do.

2 Q. Has it been active since 2017?

3 A. Yeah. We looked it up. By the time I tried
4 doing this, the dates were already gone.

5 Q. Yeah, so the 2017 dates are gone, and you can't
6 check?

7 A. I tried. I wish they were there.

8 Q. You can't check?

9 A. I tried. I couldn't.

10 Q. John Trion was your second driver?

11 A. He was.

12 Q. Okay. And we talked about Mr. Richard Anderson
13 before, the Apopka city administrator who got in some
14 trouble with that hit-and-run accident?

15 A. Yep.

16 Q. There has been some allegations, are you aware,
17 that you asked Mr. Trion to go gather belongings from
18 Mr. Anderson's car that included a computer, firearms?

19 A. No, I never asked John to do that stuff.

20 Q. Are you aware that somebody made that
21 allegation --

22 A. Yeah, I've heard something about that. I think
23 the -- I want to say the highway safety people -- I mean
24 Johnny knew Richard from -- so I think the assumption
25 that I was the one who would do that probably came from

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1 the fact that Johnny drove my car, but I didn't -- I
2 mean, first of all, if Richard called me up and said,
3 Hey, would you mind sending your guy, I would have done
4 it. I wouldn't have been thinking like, I wonder what's
5 going on here. I would have responded to my friend
6 affirmatively like that, but I don't recall ever having
7 him do that. But again, Johnny was a driver. He would
8 go do things like that. So, I mean, if you tell me that
9 happened, I would totally believe it, but I did not -- I
10 was not part of that.

11 Q. Did law enforcement ever question you about the
12 hit-and-run accident?

13 A. Yes.

14 Q. What did they ask you?

15 A. If I knew where Richard Anderson was that
16 night.

17 Q. And did you?

18 A. I had seen him earlier, like five hours before.

19 Q. Were you ever questioned about Mr. Trion going
20 to gather belongings from Mr. Anderson's vehicle?

21 A. I don't think so. I think they might have -- I
22 read that somewhere, but I don't think I was ever asked
23 that question by them. Because I -- Johnny, as I
24 recall, got very nervous and just basically -- I don't
25 know what the deal was. I honestly do not remember,

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1 but, I mean, first of all, there would be nothing
2 untoward about saying if a friend bumped into you and
3 said, Hey, do em a favor, can you send your driver to
4 come pick me up, that would not be uncommon.

5 I probably would have done it if I had been
6 asked. If it was an impound lot, I might have a few
7 more questions. But, I mean, again it was -- it is just
8 not my nature to stop and think I wonder why this guy
9 would want my driver to go pick something up. I
10 wouldn't -- my mind probably would not go to that.

11 Q. Did you understand the car was in an impound
12 lot?

13 A. I found out later.

14 Q. Yeah, and did you understand it got broken into
15 and some things were taken out of the vehicle?

16 A. No, I did not know that. That is new
17 knowledge.

18 Q. And you don't have any knowledge of Mr. Trion
19 being involved in that one way or the other?

20 A. No, absolutely not. Johnny wouldn't do that.
21 As I recall, Johnny telling me the way it went down that
22 basically he went there, and they were like, Who are
23 you? He was like, I'm -- like, Never mind. I think he
24 just left. So I don't know anything that happened more
25 than that. I remember Johnny just telling me that there

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1 was -- he went there, they asked him some questions, and
2 just like don't worry about it. That was kind of the
3 conclusion of it.

4 Q. And when you say he went there, he went to the
5 impound lot?

6 A. Or he was at -- again, I don't recall asking
7 Johnny, and I'll be the first to say if I had done that,
8 I'd say, yeah, I did that. I just don't remember ever
9 asking him; but, again, everyone knew Johnny. It would
10 not be atypical and it is possible that Richard said,
11 Hey, can you do me a favor, can you give me his number
12 and just let him know. I just don't recall any of that,
13 but, I mean, I did not facilitate Johnny doing anything.
14 Although, I'm just going to say again, I mean, part of
15 having a driver is people call you up and say, Hey, can
16 we use your car for this or that? Can you do this or
17 that? I wouldn't -- I probably would not like raise any
18 sort of red flags for that.

19 Q. All right. So going back to the Heathrow
20 master gate ledger which we have previously marked as an
21 exhibit and you have in front of you, 105, the next
22 entry on June 21, 2017, is at 1:25 p.m., and it looks
23 like you came back in in your Cadillac at that point in
24 time.

25 A. I mean, I have no idea.

1 Q. You see that --

2 A. Yeah, I see the name, but I -- yeah, it looks
3 like probably lunch. I don't know.

4 Q. And I do notice that in your Wells Fargo
5 records --

6 A. Sonny's and then Liam's.

7 Q. Sonny's Barbecue is on page eight of 19 of that
8 ledger. It looks like you went to Sonny's and spent
9 about \$50 there on that day?

10 A. Yes.

11 Q. Could it have been the case that you picked up
12 Sonny's and brought it home or took your kids to Sonny's
13 for lunch or something along those lines?

14 A. Well, mathematically -- yeah. I'm just trying
15 to figure out what would total up to 50 bucks. It
16 sounds like -- yeah. I don't -- I sometimes pick it up
17 and bring it home. I sometimes eat there. I don't --
18 there's no -- I cannot glean any sort of -- I don't
19 know. Probably had Sonny's, probably ate it there,
20 might have come home with it. I don't know.

21 Q. Going back to the gate ledger here, it looks
22 the next entry there is at 4:48?

23 A. Yes.

24 Q. That is a **REDACTED**, do you see that?

25 A. I do.

1 Q. Okay. And that was probably Ms. REDACTED
2 picking up her son?

3 A. REDACTED, yes.

4 Q. Were you home at the time that Ms. REDACTED came
5 to your residence?

6 A. I don't know.

7 Q. Are you certain that you dropped your kids off
8 on the 22nd and not the 21st?

9 A. Well, yeah. Yes.

10 Q. Okay. Because the custody agreement said that
11 you would have your kids until the 22nd at 9:00 a.m.

12 A. Right.

13 Q. I'm just wondering if it could have been the
14 case that you dropped them off earlier?

15 A. We would not do that because my exwife, being
16 as you pointed out a family attorney, was incredibly --
17 she would love to have it more -- she would have loved
18 to have more overnights, we would have never done that.
19 Just very precise and on -- whatever the equation was is
20 what we did. There would not be they go back a day
21 early or anything.

22 Q. All right. Going back to the Wells Fargo
23 records here, I want to go to page nine of 19. There is
24 a reference here to Twin Peaks in Altamonte Springs.

25 Do you see that?

1 A. Yes.

2 Q. And it looks like you went there on the 21st
3 which would have been -- you still would have had
4 your -- REDACTED and REDACTED correct?

5 A. Yes.

6 Q. And do you recall going to Twin Peaks on that
7 June 21, 2017?

8 A. I don't.

9 Q. Would you have taken your kids there, REDACTED
10 and REDACTED.?

11 A. REDACTED., possibly. Probably not REDACTED.
12 It's not that I wouldn't do it, she just wouldn't. She
13 doesn't really like that kind of food.

14 Q. Do you recall anything about your visit to Twin
15 Peaks on June 21, 2017?

16 A. No.

17 Q. Do you recall like who you would have met there
18 or --

19 A. No.

20 Q. Is there a typical group that you meet there?

21 A. I mean, I have -- I have friends who I see
22 there, but no. I mean, what appears to be a \$59 --
23 probably what -- I mean, I know that that day went to
24 the movies with Rebekah. I think we went to Buy Buy
25 Baby to do some clothes shopping; but, I mean, again, I

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1 had just been gone for some period of time and probably
2 said like -- based on \$55 -- I'm sorry, \$59 on that one
3 and --

4 Q. And then on the next day you went for a little
5 bit --

6 A. Yeah, that's more typical. Listen, I'll be the
7 first to admit -- my wife, I think she used a certain
8 phrase for it, but I -- yeah, that would be more
9 typical -- that would be a more typical trip for me than
10 a \$59 one.

11 Q. All right. And you said that on the 21st you
12 had gone to the movies and Buy Buy Baby?

13 A. Yes.

14 Q. And what facts and circumstances lead you to
15 believe that you did the movies and Buy Buy Baby? What
16 type -- some type of record --

17 A. No, just got back from vacation, and she
18 wanted. My wife was real pregnant. She wanted to get
19 some clothes for it. We had been gone, and women grow
20 as their pregnant. I think she decided that she was
21 entering the phase where she wanted to go get some stuff
22 so we went and got it.

23 Q. Is there a credit card receipt or something
24 that you saw that refreshed your recollection that --

25 A. Maybe. I think I did see something like that,

1 but my -- it might have been hers.

2 Q. And she had an Amex, right?

3 A. Yes.

4 Q. And was it just her spending money on the Amex,
5 and you used Wells Fargo at this point in time?

6 A. No. We would use her credit card to bag points
7 for anything, any travel and anything. Again, I don't
8 like paying bills. My wife does it. I'll be the first
9 to admit, paperwork is not my strong suit. She's very
10 good at it, so she's -- since we've been dating, I'd say
11 probably six months into us dating, she more or less
12 just took over those things and then...

13 Q. And do you recall what timeframe you went to
14 the movies?

15 A. No.

16 Q. And do you recall what movie you saw?

17 A. No.

18 Q. Do you recall what timeframe you went to Buy
19 Buy Baby?

20 A. No.

21 Q. Was it before or after your son -- or

22 Ms. **REDACTED** came?

23 A. I have no idea. I really don't know. And by
24 the way, at that point in time, my kids were 13 -- 14
25 and 16. So, I mean, like, yeah. I don't know. I don't

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1 know.

2 Q. So that day, referring to the 21st, you get
3 home in the wee hours of the morning?

4 A. Yes.

5 Q. And then you get up and go to Sonny's Barbecue
6 for lunch?

7 A. It sounds like me.

8 Q. And then you go to a movie, Buy Buy Baby, and
9 Twin Peaks?

10 A. All in Altamonte.

11 Q. And then get to Liam Fitzpatrick's that day
12 too, correct?

13 A. For another 50 bucks. Probably a drink or
14 maybe lunch. I don't know. I have no idea. I think we
15 tried to find that from them, and they didn't even have
16 the record at the restaurant.

17 Q. No, I've issued subpoenas too, and I haven't
18 been able to --

19 A. I would love to know. The answer is if you
20 look on the -- I'm sure you have -- my Liam's tabs or
21 more reminiscent of that second Twin Peaks tab and not
22 the first one. That is probably a day where I was just
23 back and, you know, just...

24 Q. Twin Peaks, how long does it take you to get
25 from your home to Twin Peaks?

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1 A. Fifteen minutes.

2 Q. And Liam's is just around the corner, right?

3 A. Liam's is 3.3 miles from my house.

4 Q. So 15 minutes to Twin Peaks. Liam's, what does
5 it take you?

6 A. I think -- you know, you go down a road that is
7 25, 30 miles an hour, I'm not in a huge rush, probably
8 10, 15 minutes. But if you wanted to haul, you could
9 probably make it a little faster. Again, it's
10 International Parkway which is a winding road, and it's
11 not the fastest.

12 Q. How often do you go to Twin Peaks?

13 A. It's one of about five restaurants that I visit
14 with frequency.

15 Q. Would you say you go there once, twice a week?

16 A. Sure.

17 Q. Do you continue to go there today?

18 A. Yes.

19 Q. Did Mr. Greenberg ever join you at Twin Peaks?

20 A. Probably. I don't remember, but probably.

21 (Exhibit 109 was marked for identification.)

22 BY MR. PERKINS:

23 Q. The next exhibit will be 109, and these are
24 text messages that you produced, texts between yourself
25 and Mr. Greenberg.

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1 Do you see the bates stamp at the bottom?

2 A. No, I don't see that yet.

3 Q. Okay. One second. Do you see it now, text
4 messages between yourself and Mr. Greenberg?

5 A. Yes.

6 Q. Okay. And you see a bates range there?

7 A. What's that?

8 Q. The bates range at the bottom there?

9 A. What's the bates range?

10 Q. These bates numbers at the bottom 2271, for
11 example, Dorworth?

12 A. Sure.

13 Q. Okay. So let's go to page nine here. There is
14 a reference here, This was just texted to me by a Twin
15 Peaks waitress.

16 Do you see that?

17 A. Yeah.

18 Q. And that's you sending that. Do you know who
19 that was, who that waitress was?

20 A. I don't know.

21 Q. Do you have -- how many waitresses from Twin
22 Peaks do you have their contacts in your cell phone?

23 A. None right now.

24 Q. What about back when this text string was sent?
25 I think this is October of 2019.

1 A. Without knowing more, I don't know who that
2 would be. But, I mean, let me put it this way: If --
3 it is not uncommon for people in my life to say, You
4 should -- if you are having a problem or somebody just
5 got fired, call Chris. That happens quite regularly.
6 In fact, like one of the waitresses at Grafton was like,
7 Hey, you know, one of my friends has some problems.

8 It would not be uncommon for someone to send me
9 something saying that they lost their job. I just don't
10 know what that is referring to. That would be very
11 typical. I have had like five people this year call me
12 and say, I've got a DUI. I'm just somebody who a lot of
13 people would -- they find themselves in a circumstance
14 like losing their job. Maybe it's that, but I don't
15 know what that's referencing, and I don't have any idea
16 what the Miami thing would be.

17 Q. This doesn't refresh your recollection as to
18 who this would have been?

19 A. No, sir.

20 Q. Do you know a K^{REDACTED} B^{REDACTED} from Twin Peaks? Does
21 that name ring a bell at all?

22 A. No. K^{REDACTED}?

23 Q. K^{REDACTED}.

24 A. No.

25 Q. In the course of your deposition -- or your

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1 wife's deposition, there was some discussions about
2 strip clubs.

3 Do you recall that?

4 A. Yes.

5 Q. And your wife was asked if you had been to a
6 strip club since you were married in 2016.

7 Do you recall that line of questioning?

8 A. Yes.

9 Q. And her answer was that no, you had not been to
10 a strip club.

11 Do you recall that?

12 A. Yes.

13 Q. And is that a true statement?

14 A. Yes.

15 Q. And then there was some discussion that --
16 about some type of invitation that came from Josh
17 Katsur.

18 Do you recall that?

19 A. Correct.

20 Q. And can you tell me about that?

21 A. I mean, I didn't -- at the time, I didn't think
22 it was anything particularly sinister. Josh, who is
23 Dr. Katsur's son, had reached out to me, and we had met
24 through a mutual friend. At the time, I didn't really
25 know what was going on, but Joel I think was in jail at

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1 this point in time. He had already damaged all of
2 Abby's stuff and was in there. Then Josh showed up
3 through a mutual friend of mine named Scott Miller.
4 Scott asked if we could all get lunch together at
5 Hillstone.

6 And when we got there, I met him, and he
7 basically told me, My dad's kind of one of the Greenberg
8 Partners at the dental place. And with all the Joel
9 stuff, you know, I just wanted to meet you and kind of
10 used that as his entre to come in. And we became
11 friends, and, you know, Josh just told me his favorite
12 thing to do was to go to the strip club. He loved -- he
13 loved being there. He loved the -- you know, loved all
14 the attention that you got. He said people are just so
15 nice. You can drink and have a great time. He was kind
16 of in love with one of the waitress's there. He would
17 ask if I wanted to go.

18 Q. And when was the first time that he asked you
19 to go?

20 A. I don't know. I couldn't even tell you when
21 the meeting was. Whenever Joel was in jail after
22 destroying Abby's stuff, shortly after that, I got
23 there. He also hired my attorney, the Katsurs did, over
24 at Lowndes Drosdick for just a short period of time.
25 Same time, same introduction, also through Scott Miller,

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1 and -- I'm sorry, what was the question?

2 Q. When was the first time that he asked you to go
3 to a strip club because there was some -- if you recall,
4 there was an assertion in the deposition that maybe Abby
5 or Joel Greenberg was behind the invitation.

6 A. I believe Joel Greenberg was in jail. I don't
7 think Abby or Joel Greenberg were behind anything. I
8 think Dr. Katsur might be behind that. But again, I
9 know that -- I know this because Josh told me this. He
10 said he was basically sent to meet me obviously with all
11 the stuff with the Greenbergs. He kind of came almost
12 like I'm a friend. We're -- and the way he talked was
13 very like the Katsurs did not have a lot of respect for
14 the Greenbergs because of all of the problems that had
15 come from Joel.

16 Q. And this first meeting was at Hillstone?

17 A. Yeah, that wasn't just the first meeting. We
18 had a lunch at Hillstone.

19 Q. And it was you, Josh, and Mr. Miller?

20 A. Scott Miller, yes.

21 Q. The three of you?

22 A. Correct.

23 Q. And the best geographic -- the timeframe that
24 you can give me best for that is after Joel was in jail?

25 A. Yes.

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1 Q. And why do you believe that Dr. Katsur was
2 behind the invitation to you to go to a strip club?

3 A. I don't know. I can't speak for Dr. Katsur.
4 Dr. Katsur didn't answer a lot of questions when we did
5 ask him. He just sort of decided what was private and
6 what wasn't, but I think the point was just that we had
7 had a conversation or we sort of made the statement that
8 I don't like strip clubs. I don't like strip clubs.

9 I took a human sexuality class at the
10 University of Florida. There's some pictures on there
11 that scarred me to this day. I'm just not a -- I'm a
12 clean person, and I don't -- the idea of it is just not
13 attractive to me, and I think we had made that comment.
14 We had sort of had a conversation. I -- Rebekah
15 remembered this better than I did, but it was basically
16 to the effect of they -- Anne Pham had asked her, Do you
17 really think your husband doesn't go to strip clubs?
18 And she said, No, my husband does not go to strip clubs.
19 That is a factual statement.

20 And at that moment in time, then like two days
21 later there is an invite to come. Hey, we're going to
22 go there. The way it was made out to me, I wish had
23 taken more attention to this, but it was basically if
24 you were someone who likes strip clubs, if you are
25 someone who Rachel's North which is the one in

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1 Casselberry that Josh Katsur was real big on, if this
2 was your -- he had it basically like the best of
3 everything. The best booze, the best girls, the best
4 all this stuff, and I politely declined.

5 Q. And did that invitation come by text or --

6 A. I don't know.

7 Q. You don't know?

8 A. I don't know. Probably a phone call. It could
9 have been a text. I don't know.

10 Q. And you said that Josh did not have kind things
11 to say?

12 A. Yes.

13 Q. And what -- can you elaborate on that?

14 A. I mean, there -- probably had two dozen
15 conversations on the subject, and it was basically just
16 about how the Greenbergs, they've screwed everything up
17 with Joel, and his dad is going to come in and fix it.
18 And, you know, the -- at first he was kind of like, Hey,
19 are you -- I believe in retrospect he was just searching
20 for information because they had decided they were going
21 to go and start lying about me and Gaetz and others to
22 try to get us wrapped into the thing so that Joel could
23 get less time. And so I think probably what they were
24 trying to do is just sort of keep track on me.

25 But, you know, I met Josh, and we socialized

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1 frequently. He threw a party for me at his house, had a
2 DJ, and a full dinner. And I reciprocated by having --
3 when the movie Coming to America 2 came out, I hosted a
4 party at my house. This was a real party. Probably had
5 30 people at it, 40 people at it. Josh and a bunch of
6 his friends, I considered them -- at the time I had no
7 idea that Joel was out doing this scumbag stuff trying
8 to drag people in there. So I just -- I took it at face
9 value.

10 To be very clear, the day that Joel got
11 arrested where his house got raided, Sue and Abby called
12 me. I'm the one that called and got -- made sure the
13 governor's office knew he was going to resign. I wrote
14 Joel's resignation letter. I mean, it was me and Vince
15 Citro. I made sure that the staff was made aware of
16 what was going on. I did a lot of things, and I didn't
17 do it because they paid me any money. I did it because
18 I was trying to look out for Abby and Sue.

19 But as soon as Joel got stuck in there, they
20 just said the hell with you. Everybody -- and again, I
21 do believe that Joel tries to persuade the world that he
22 is somehow not too blame for this, and this is other
23 people's thing. I think the Greenbergs are just
24 pathologically stupid when it comes to believing Joel's
25 stuff. So my guess is that my -- in retrospect, I just

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1 assume that it was the Katsurs that wanted to keep track
2 because they knew the strategy of what Joel was doing,
3 trying to lie to --

4 Q. What motivation would Dr. Katsur have to get
5 information -- be searching for information so that he
6 could lie about you and Matt Gaetz?

7 A. Well, all I can do is tell you this much: Out
8 of nowhere, I get invited to a lunch through a mutual
9 friend. I was told by that mutual friend that the
10 Greenbergs were highly desirous to being helpful to me.
11 I was encouraged to go along and start an insurance
12 company that would have all the providers for Greenberg
13 Dental. That was done from Josh Katsur. I went so far
14 as to actually consult with lawyers, Tim Mead and
15 others, in Tallahassee about what goes into creating an
16 insurance practice for a dental practice.

17 So I can tell you they came and they had a real
18 high level of interest. And Josh specifically told me
19 his dad was the one who would sort of encouraging of it
20 all happening which was very surprising when Dr. Katsur
21 denied that in the deposition. But I met Josh, I met
22 Josh's best friend who was the lawyer for Dr. Katsur who
23 I believe was in a -- nice guy. Was in a car crash, and
24 I want to say he was quadriplegic, and -- but he was
25 their attorney. Josh said, My dad takes -- Josh always

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1 tried to make this point out of it. Like -- I was like,
2 I don't know what you're talking about. I don't have an
3 issue with Greenberg Dental because I didn't realize
4 they were out trying to get me and my friend jailed for
5 things we didn't do.

6 Q. And what evidence do you have that Dr. Katsur
7 was lying about you or Matt Gaetz to the authorities and
8 the press?

9 A. I don't think I said -- I don't know that he
10 ever said anything to the authorities or the press. I
11 think that he was keeping track because he has a
12 multimillion dollar investment, and he knew that his
13 partners, the Greenbergs, and their kid were out there
14 trying to mess around with me, mess around with Matt
15 Gaetz for the purpose of getting us in criminal trouble
16 so that their son could get out of jail faster. I do
17 think that Dr. Katsur was aware of that.

18 And listen, nobody says that the Greenbergs are
19 stupid. I think they're probably aware of the fact that
20 lying about a U.S. congressman and somebody who is a
21 lobbyist probably carries with it some risk because --
22 you know, and so my guess is Dr. Katsur was keeping
23 close track on that.

24 Q. So as you sit here right now, you have no
25 recollection of who this waitress was from Twin Peaks?

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1 A. No. I don't really understand what the text
2 is. Why would the -- why did I lose my job because some
3 jerks...

4 Q. In Miami weren't following the rules.

5 A. I don't even know what that means. I mean, I
6 can't follow -- I don't know. No idea.

7 Q. Let's go back to the Wells Fargo. We have this
8 Liam Fitzpatrick entry for 6/21.

9 Do you see that?

10 A. Yes.

11 Q. 55 bucks. Do you have any recollection for
12 what that was for, and who you were with?

13 A. No.

14 Q. Is there a place you typically sat at Liam
15 Fitzpatrick's or --

16 A. Typically in the back at a place called The
17 Snug.

18 Q. And was there a bartender or person that waited
19 on you that you typically dealt with there in The Snug?

20 A. I mean, I would go to Liam's some months 20
21 times. You know, there would be different bartenders in
22 there. I don't have an office/office, so oftentimes I
23 will have meetings, and my direct location was always
24 Liam's. During the day, I would go to Twin Peaks or
25 Hillstone, and typically afternoon/evening at Grafton.

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1 And also walk home.

2 Q. You would walk home from Liam's?

3 A. I mean, Liam's is 3.3 miles from my house.

4 Twin Peaks was a long distance from my house. Usually I
5 would drive. I don't know -- but, I mean, if there ever
6 came a time where I had too much to drink, I might walk
7 home. It took about an hour.

8 Q. On June 21st, I have gone through your AT&T
9 phone records and had a couple of questions about some
10 of the calls that were placed on June 21, 2017. One was
11 with a Mr. Luke Classon, C-L-A-S-S-O-N, on June 21,
12 2017, at 8:53 eastern time.

13 Who was Mr. Classon?

14 A. He's my civil engineer for my development
15 business.

16 Q. And what development business is that?

17 A. Well, it would be through CED Strategies. I
18 don't have like one corporation that I use for
19 everything, but Luke was my project engineer for
20 probably ten different deals.

21 Q. And then another call was made -- or a text,
22 I'm sorry, with a Ben Christine Morales of Elite Options
23 on June 21, 2017, at 9:41.

24 Do you know a Mr. Morales?

25 A. 9:41 at night or 9:41 in the morning?

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1 Q. 9:41 at night.

2 A. I don't think I know a Ben Morales.

3 Q. Ben M. from Elite Options, that name doesn't
4 ring a bell?

5 A. I don't know what Elite Options is. I mean,
6 it's possible that I know him from Uber Eats or
7 something, but I don't think I know a Ben Morales. If I
8 do, I don't know how... Remind you, I was in politics
9 for a long time, so sometimes I will have -- like I'll
10 be Facebook friends with somebody, and I don't know who
11 they are. It just goes back to that time. So I don't
12 know a Ben Morales?

13 Q. And then at 10:39 p.m. that night, you had a 30
14 second call with a Holloway Credit Solutions from a
15 number out of southern Alabama (334) 396-3000.

16 Does that ring a bell?

17 A. No. What's it called?

18 Q. Holloway, H-O-L-L-O-W-A-Y?

19 A. No, I don't know what that is. 10:40 at night?

20 Q. This was 10:39 on June 21, 2017. And if you
21 look at the gate code going back to 105 on that day
22 which is page five, you come into the neighborhood at
23 10:59 p.m.

24 Do you see that night?

25 A. What time am I looking for?

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1 Q. June 21st.

2 A. Okay.

3 Q. You come into the neighborhood that night 20
4 minutes after you made that call to Holloway, and I was
5 just curious if that name rang a bell at all. Nothing?

6 A. (Witness shakes head.)

7 Q. Do you know where you were coming in from on
8 June 21st at 10:59?

9 A. I do not. It was the end of the day, but I
10 might have left and come back. I just don't know.

11 Q. Okay. And it was a Wednesday night.

12 A. Yeah, I had a real pregnant wife. I mean, she
13 might have been hungry and wanted something. It doesn't
14 take much to figure out what it probably was, but I was
15 probably just going to get something for her.

16 Q. And your two kids, 14 and 16, were at your
17 house that night?

18 A. Yes.

19 Q. You're absolutely certain of that?

20 A. I mean, I will tell you this much that as a
21 general rule because of the fact that my exwife was a
22 divorce attorney, because of the fact that we were in --
23 as this was all going on right now in the middle of a
24 guardian ad litem argument over me wanting more custody
25 of my kids than I had, and that I had already signed the

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1 agreement with the guardian ad litem and that they could
2 do a status check at any point in time, I mean, I can
3 tell you this much: I was keeping my kids every day
4 until -- if it was 9:00, I would probably sit with them
5 until 8:59 when I pull up. I was very desirous of
6 spending as much time with my children as I could.
7 Especially at this point in time because of the guardian
8 ad litem report, the custody case, and everything else.

9 Q. And you're aware of the allegation that you met
10 with "AB" either on the night of the 21st or the 22nd?

11 A. I thought it was the 21st. I thought that was
12 the day she designated I met with her. I never met
13 "AB." I never went to a hotel room with Joel.
14 That's --

15 Q. Have you ever been to the Orlando Marriott Lake
16 Mary where --

17 A. Yes.

18 Q. Where it was identified by Ms. "B"?

19 A. Yes.

20 Q. On how many occasions?

21 A. I mean, I had my victory party there when I won
22 my elections back in 2007, 2008, 2010. So, I mean,
23 yeah. It is the convention hotel in the area. It's
24 where all the dinners are. They opened a Westin a few
25 years back, and that has split that up. But, I mean, I

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1 have been to that thing -- probably been to a 150 events
2 at that hotel over the years.

3 Q. And as you sit here today, you believe it's a
4 case of mistaken identity?

5 A. I'm almost certain it is. The way that -- the
6 way that "A" -- either "AB" is just outwardly lying at
7 the encouragement of Joel which, you know, could be, or
8 more likely that there was somebody else who and maybe
9 they introduced him as Chris, maybe they didn't. I
10 don't know. I never met the woman. She can't identify
11 really my accent. She couldn't tell me anything we
12 talked about. I mean, I'm a talker, and, I mean, the
13 idea that she would just have no idea about anything, I
14 don't think she met me. I think she probably -- it was
15 probably Joe Ellicott or somebody else, but I know it
16 was not me.

17 Q. She had mentioned -- you sat through her
18 deposition, Ms. "B", correct?

19 A. Yes.

20 Q. And she had mentioned that you had expressed
21 that you were at an event that night.

22 Do you recall that testimony?

23 A. Yeah, she did say that.

24 Q. Were you at any type of event on --

25 A. I don't think so.

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1 Q. -- on June 21st?

2 A. I believe I was with my wife and my kids that
3 day.

4 Q. What about on the 22nd? Was there any type of
5 event that you --

6 A. Again, I don't know, but I don't think so.
7 I -- the 21st is a zero percent chance of that stuff
8 because I would probably not go to an event if I had my
9 kids that night. I mean, I would, I was not the type of
10 parent that would have the kids but not be the with
11 kids. It just wouldn't happen. Of course, Joel's
12 testimony in his interrogatories, he says we went to
13 Liam's right beforehand. She says that I came from a
14 party. So I think they're just making this stuff up as
15 they go along. What did not happen is I did not meet
16 with Joel Greenberg and "AB" at a hotel that day or
17 ever.

18 My belief is pretty simple. I think that he
19 knew that he had to -- in order for there to be a crime,
20 there had to be somebody underage. I think it's made
21 up. He probably knew he had a day like this with her
22 and just worked backwards on that. I don't think there
23 is any -- there is no -- I don't remember any events at
24 the time. I probably wouldn't have gone to them even if
25 there had been. So, no, I don't think so.

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1 Q. Let's move on to June 22nd then. Do you see
2 that? Going back to the gate ledger, Exhibit 105 up on
3 the screen.

4 Do you see that?

5 A. Yes.

6 Q. Okay. And I have two entries there, both for
7 Uber.

8 Do you see that?

9 A. Yes.

10 Q. One for 6:46 p.m. and then one for 11:04 p.m.

11 Do you see that?

12 A. Yes.

13 Q. Would that have been you coming into the
14 neighborhood in an Uber?

15 A. I have no idea. My kids were 16 and 13 at the
16 time, and they were -- my daughter didn't have her
17 driver's license yet. She waited like a year after she
18 turned 16 to do that. So that could have been them.
19 That could have been me.

20 Q. Let me stop you right there. The custody
21 agreement says you had to drop your kids off by 9:00
22 a.m. --

23 A. So in that case they were gone.

24 Q. So in all likelihood, this was you coming into
25 the neighborhood in an Uber?

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1 A. Probably getting picked up and then dropped
2 off.

3 Q. Okay. Because we did see evidence that you
4 were at Twin Peaks and Liam's on this day, correct?

5 A. And you saw how much I spent. The odds are
6 good that I was probably not in a good place to drive
7 home, so I Ubered there and back.

8 Q. Now, you had mentioned that you looked for your
9 Uber receipts back in 2017, and your app didn't go back
10 that far?

11 A. Yeah. The feds asked me to provide my Uber
12 stuff. Actually, Uber got turned off on my phone for
13 awhile as a function of this. I was able to get it back
14 on; but, yeah, I was unable to do that.

15 Q. Did you have to give the feds your phone? Did
16 they take it?

17 A. No. I think they only took the phones from
18 people who wouldn't comply with their discovery
19 requests.

20 Q. Have you asked informally Uber, Hey, do you
21 have my receipts from back in the summer of 2017?

22 A. I don't really have a means by which to ask
23 informally those questions. I believe I called and
24 asked them -- I think we called and said, you know --

25 Q. Well, I've subpoenaed them --

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1 A. Yeah. Well, I couldn't subpoenaed them because
2 it was a criminal investigation back then, but you have
3 them. I just don't.

4 Q. I don't have them yet, but I'm working on it.

5 A. Good luck.

6 Q. I was just curious if you've had any contact
7 with Uber --

8 A. No.

9 Q. Now --

10 A. We turned over basically every record -- I
11 think they asked for it, and I was able to produce a
12 bunch of it, but I think on the dates in question here,
13 it was...

14 Q. Now, you do you recall testifying that when the
15 FBI was asking you some questions, you went back into
16 your gate ledger and were able to find some of these
17 names?

18 A. Well, I didn't know there was a gate ledger
19 until we got to that thing, and they said when we were
20 at the thing, they said, like, We know she was at your
21 house. I said, Well, how do you know she was at my
22 house? They said, Well, she's on the gate log. So I
23 went home and my wife was there, and I said, Honey, we
24 need to find apparently some way to get the gate logs.

25 So Rebekah is the one that actually went into

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1 the room. She called up the HOA and figured out the
2 deal, got our log and everything. So after I got back
3 from the FBI interview, as soon as I walked in my front
4 door, I told her this, she -- they call up, we find
5 those things, and we see -- I find out that this "AB"
6 woman has been at my house. I'm like, I have never met
7 her. I don't know what to tell you. And so I go into
8 my phone and see it's the same time I was on the water.
9 I think it was like nine or ten minutes apart or
10 whatever it was.

11 Q. I notice that the gate ledger, the snapshots
12 that you were able to pull, had another category in them
13 that identified the person riding in an Uber.

14 A. All I do is just log into my thing. It's just
15 there.

16 Q. If you were to go into that today, could you
17 figure out -- could you go all the way back to 2017?

18 A. No, that doesn't go back that far. You can go
19 back further on the computer, but you can't do it on
20 your phone. But we have done that. I've gone through.

21 Q. Because I've asked Heathrow to identify the
22 riders in these Ubers. Apparently there is another
23 category that I can get. I'm waiting on that to come in
24 too, but I'm assuming that this was --

25 A. That's not done every time. I think that's

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1 sort of how they do it. There is plenty of times if
2 it's just an Uber driver, they let you right in and ask
3 where you're going. But, yeah, I don't know. Like I --
4 they do weird things too. Like one time on those things
5 I want to say it was Mike Fischer and then Eric
6 Foglesong was in the passenger seat. So I'm not
7 terribly clear how that was known to anybody because
8 they don't ask you. It's like who are you in the
9 driver's seat? Who are you in the passenger seat? They
10 don't do that.

11 Q. Going back to the summary of Wells Fargo
12 records which was Exhibit 108, I have that back up on
13 the screen, and we have been talking about the 22nd.

14 Do you see that up there?

15 A. Yes.

16 Q. And it looks like I have two entries for Twin
17 Peaks, one for 234.73 and one for 31.29, and then I have
18 a Liam Fitzpatrick's for 260, correct?

19 A. I'm just confused because I could have sworn
20 you guys -- somebody said that Joel was only at that
21 hotel for one day, so I don't know how on the -- I
22 didn't have it on the 21st either, but on the 22nd, I
23 know the evening things. You'd think they'd take them
24 out at 3:00 or something, noon, whatever the checkout
25 is. But anyway, I was at Twin Peaks obviously that day.

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1 Q. Okay. Do you recall anything about your visit
2 to the Twin Peaks on the 22nd?

3 A. No. That was -- that would probably be a
4 drinking session.

5 Q. With somebody?

6 A. Probably my buddies, yeah.

7 Q. Jason Brodeur and --

8 A. Jason doesn't love those places. He's not a --
9 I mean, he's a state senator, so he can't go to -- there
10 is nothing wrong with Twin Peaks, but I just think -- he
11 has been there before, but I don't think he's a -- he
12 doesn't frequently...

13 Q. Who would be a buddy that you would go to Twin
14 Peaks with?

15 A. I've got a bunch of buddies that go. Eric
16 Foglesong would be one of them.

17 Q. Okay. Do you have any idea why there'd be two
18 entries there?

19 A. Well, because one person got off and asked that
20 we close the tab, and we stayed and paid a second tab.

21 Q. And then your standard operating procedure
22 would be Twin Peaks in the day and Liam Fitzpatrick's in
23 the evening?

24 A. Could be -- well, I don't know there is -- we
25 don't have a standard operating procedure; but in

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1 general, at nighttime I just don't like to be too far
2 away from my house in that regard.

3 Q. Would you ever take an Uber to Twin Peaks and
4 then take an Uber from Twin Peaks to Liam Fitzpatrick's
5 and then Liam Fitzpatrick's to home? Would that be --

6 A. Sure. It doesn't sound like something I'd do,
7 but it could be.

8 Q. There is a Peach Valley Cafe referenced there
9 in Heathrow.

10 When would you have done that, the Peach Valley
11 Cafe?

12 A. It's a breakfast place. They're open until
13 2:00 in the afternoon, 2:30 in the afternoon.

14 Q. Would it be possible that you went there to eat
15 breakfast with your kids to say goodbye and then dropped
16 them off at your exwife's house in College Park?

17 A. Highly possible.

18 Q. Now, do you recall in the course of the
19 deposition of Ms. "B" I asked her if you had any
20 distinguishing features?

21 A. I do.

22 Q. A tattoo or birthmark, and her response to that
23 was big belly and small penis.

24 Do you recall that?

25 A. Yeah. If I ever met her before, that would

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1 have really bothered me, but I have never met her so I
2 don't take it personally.

3 Q. In the summer of 2017, was your appearance any
4 different than it is now in terms of weight?

5 A. My weight fluctuates. The most I ever weighed
6 was 340. I'm probably around 285 now. So, I mean,
7 that -- around that time I was probably around 3 -- I
8 have no idea. I could not -- you have got a picture of
9 me, and that's what it is, and I don't know what my
10 weight was.

11 Q. You were heavier than you are now?

12 A. I mean, I gain or lose 20 pounds in a few
13 weeks. It doesn't take long. I'm a big guy.

14 Q. And do you have a tattoo or birthmark --

15 A. No.

16 Q. -- or anything like that?

17 And you're circumcised, correct?

18 A. Yeah, like 81 percent of people I think. Yeah.

19 Q. There was some discussion in the course of your
20 wife's deposition about measuring your penis.

21 Do you recall that?

22 A. Yes.

23 Q. And she said she measured it?

24 A. Yes.

25 Q. And it was eight inches long; is that right?

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1 A. Yes.

2 Q. When did she measure it?

3 A. Well, she did again that night --

4 MR. ANDRADE: I'm going to object to --

5 THE WITNESS: I don't mind answering. That
6 night we got back and she said, I want to make sure,
7 and it was the exact same.

8 BY MR. PERKINS:

9 Q. And one of the theories you have in this case
10 is mistaken identity, correct?

11 A. Listen, I am not -- I have never met "AB." As
12 I have never met her, I can have no insight to her
13 thoughts because I haven't talked to her. I don't know
14 what she thinks. I know she obviously went and told her
15 lawyers who threatened to sue me that this happened.
16 She couldn't even list details like what the hotel was
17 when we first sued her. Not terribly clear to me why
18 she would be sending demand letters to me when they
19 didn't have anything on that.

20 Joel told me this was going to happen. If I
21 didn't get him pardoned, either the Ballard firm or
22 through Matt Gaetz, he said he was going to make them my
23 problem. He did that. He told me he had to pay her
24 attorneys. She lied about that in an interrogatory and
25 said that it never happened. And we said, What about

1 this? And she said, Oh, I did go to that one, but I
2 never retained him, or nothing became, some semantical
3 thing.

4 The reality is that Joel Greenberg sent her to
5 a lawyer, the bill was already taken care of, that was
6 conveyed as part of the discovery that was given via
7 K[REDACTED] M[REDACTED], I believe. She went there and met with
8 a lawyer, and then she refused to discuss what they
9 talked about. So my general operating thought is that
10 the Greenbergs told her what to do and sent her along
11 this path and told her that they're probably going to
12 pay money. And she and he said as much -- Vladimir St.
13 Louis said as much when he claimed that Joel had told
14 him that.

15 Q. What evidence do you have that the Greenbergs
16 paid any legal bills for "AB"?

17 A. I mean, Joel. I think -- I have evidence that
18 Joel -- they paid for Joel's life because he lost his
19 job, they took away his \$5 million in the AWG stock
20 without compensation. I mean, they're the ones that did
21 all this stuff. What do you mean? That is...

22 Q. Well, do you have evidence that they were
23 paying the legal bills for "AB"?

24 A. I mean, I know that Joel said, Go to this
25 attorney. The attorney bill has already been paid for.

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1 Q. That is Andrew Searle?

2 A. That's the name, Andrew -- it's S-E-A-R-L-E,
3 Searle. And then she lied about that, and then in a --
4 later she says, Oh, I did go there, but I didn't retain
5 him. And then I think the question was like, Do you
6 know who paid the bill? She didn't know. So, I mean,
7 the Greenbergs -- or Joel Greenberg sent her to an
8 attorney, and she did not get a bill for it. And then
9 they refused to answer what they talked about in that
10 conversation.

11 I am highly suspicious that they were giving
12 her strong encouragement to go down a path and --
13 because otherwise, why would she send me a demand
14 letter? She literally didn't have any sort of -- as
15 soon as we sued, this and that, but the reality was she
16 was put up to do that by somebody.

17 Q. Did you ever talk to the attorney that sent you
18 the demand letter on behalf of "AB"?

19 A. No. My attorney did, Richard Hornsby.

20 Q. Going back to the mistaken identity, Ellicott
21 versus you, have you ever had a discussion with
22 Mr. Ellicott about the possibility of a mistaken
23 identity here?

24 A. I haven't talked to Joe Ellicott in years. I
25 think the last time I spoke to Joe Ellicott is when I

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1 told you that Abby and Sue called me crying because Joel
2 had been arrested. I called and gave Joe a heads up. I
3 think that was the last time we talked.

4 Q. Do you have any sense of the dimensions of
5 Mr. Ellicott's penis?

6 A. I have no idea. I'm not surprised to know that
7 I do not know the answer to that question.

8 Q. Going back to the guest ledger now, let's go to
9 July 15th, page six of ten. I have that up on the
10 screen for everybody, Exhibit 105. The first entry
11 there is a Michael Fischer. We talked about him. He
12 works up in Tallahassee; is that right?

13 A. Yes.

14 Q. And he has cerebral palsy, correct?

15 A. He does.

16 Q. How do you know Mr. Fischer?

17 A. I have known Fish for a very long time. Mike
18 was the executive director of an organization called the
19 Florida Student Association which is the student
20 governments of the public universities of the state of
21 Florida. And when I was student body president at the
22 University of the Florida in 1997 and 1998, I was the
23 two-term chairman of that organization.

24 So after that, I mean, I wasn't particularly
25 involved in stuff, and it wasn't like once you graduate

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1 and move on you don't stick around the student
2 government stuff. But to this day, I meet people who
3 are FSA executive directors or chairs. So I met him
4 through that, and then he and Matt Gaetz are close
5 friends. I got to know him better through that, but he
6 has become one of my dear friends.

7 Q. When was the last time you had contact with
8 Mr. Fischer?

9 A. We text exchanged stuff yesterday. Not about
10 this case.

11 Q. Now, were you home when he got there --

12 A. I don't know. I mean --

13 Q. -- at 3:20?

14 A. I remember Fish being there, but I think it was
15 the next day. I think I was already gone by that point
16 in time.

17 Q. And gone by that point in time would have been
18 dropping Rebekah off at the airport and then going out
19 with Mr. Morris?

20 A. Again, you've conflated those two. I don't
21 know when Rebekah flew. I'm telling you my wife is big
22 on things like flying out at 6:00 in the morning, do
23 certain things to get ahead of things. If that is the
24 case, she does not usually drag me into that. If it's a
25 2:00 flight, I definitely taken her. I would have

1 probably offered if it's 6:00 in the morning flight.
2 She's pregnant. I don't really love the idea of my wife
3 there. My guess is she probably had a midmorning
4 flight. I do not know. I do not know if I went back
5 home. I don't show myself on the gate, so I don't think
6 I was, but I don't know. And I think I went to Publix,
7 then I went to my buddy's house and stayed on the boat
8 and drank a lot of booze.

9 Q. Have you discussed the July 15, 2017, gathering
10 with Mr. Fischer?

11 A. No. I think in the testimony he said -- his
12 testimony, if I remember, he said I was not there, so I
13 don't...

14 Q. Yeah. He said you were not there. He did say
15 that Mr. Gaetz was there, and he did say that Mr. Gaetz
16 spent the night.

17 A. Again, I mean, Matt and Fish are friends, very
18 good friends. That is -- they would know. I just -- I
19 don't think I saw him and definitely didn't see any of
20 those girls.

21 Q. And the girls you're referring to would be
22 K [REDACTED] M [REDACTED] and "AB"?

23 A. Yes.

24 Q. Did you see B [REDACTED] G [REDACTED] at your home on July
25 15, 2017?

1 A. I don't think I did. She would have got there
2 at 4:42, and I was gone by then so no.

3 Q. Do you know who was hosting this party on July
4 15, 2017, if you were gone?

5 MR. ANDRADE: Object to form.

6 THE WITNESS: I mean, again, I take tremendous
7 exception to the idea that it was a party. You
8 know, again, there is seven of us. I count here --
9 even if you count Gaetz which I don't -- Fish said
10 he did. Mike Fischer, Gaetz, E[REDACTED], "AB," K[REDACTED]
11 M[REDACTED], Joe Ellicott. That's -- it's not a big
12 group. It's a small group of folks.

13 I never met "AB." I do believe -- I believe I
14 met K[REDACTED] M[REDACTED] one time. I believe that was out
15 at a bar or something like that because Joe -- Big
16 Joe Ellicott was totally in love with K[REDACTED] and
17 wanted to marry her, thought that he had sort of
18 found this tremendous gem via this -- I guess via
19 Seeking Arrangement or whatever it was. But he was
20 very much in love.

21 If you read some of the interrogatories or some
22 of the stuff I think we turned over from the feds,
23 some of the stuff they had there, he described her
24 as his girlfriend. He was very much in love with
25 her. If I had met her at my house at this point in

1 time, I probably would have made a big deal out of
2 her because my friend was deeply in love with her.

3 Then about two weeks later, as I recall --
4 well, he called me up one day and asked me if I
5 could come join him at Duffy's, and I wasn't really
6 particularly close with Joe. I mean, that was sort
7 of out of the -- we had never been for food before.
8 And I said, Sure. You know, again, he was a client
9 of mine, and he worked for Joel and he was high up
10 in the tax collector's office and I really didn't
11 know what it was about.

12 I got there and Joe was in tears. It was
13 basically had a bunch of food on the table, and
14 like, you know, had to stop and lower his head. I
15 mean, it was very serious, and I asked him what was
16 wrong. And he said he found -- picked up K[REDACTED]
17 phone and found a series of what would be very --
18 we'll call it not positive images of a woman if you
19 thought she was the love of your life and you were
20 together, finding her having group sex and being on
21 the receiving end of things that I don't think most
22 people want to see happen to a woman that they love.

23 But he was just beside himself, and he also
24 kind of acknowledged. He said like, Listen, you
25 meet somebody the way I met her, I knew that she

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1 wasn't some pristine thing, but I just didn't think
2 she would do this. Joe was -- he thought that she
3 really loved him, and he finds a video full of not
4 a -- I didn't ask the details. I wasn't like, Hey,
5 let me see the phone or anything. He didn't have
6 the phone. I think she was in the shower and he
7 picked up the phone, saw somebody text there,
8 started scrolling through the texts to see who it
9 was and saw all the videos exchanged back and forth
10 and stuff like that and he was just morose.

11 BY MR. PERKINS:

12 Q. When was that meeting at Duffy's with
13 Mr. Ellicott?

14 A. I think it was around August 1st, August 2nd,
15 August 3rd, somewhere around there. I mean, again, just
16 to be totally clear on that one. In the thing that I
17 turned over, it said something to the effect of --
18 something about August -- as of August 1st that she --
19 she basically denied ever having a relationship with him
20 which I will tell you was news to him, but, you know,
21 she -- I think she basically said, Listen, you're not
22 going to do this. So after that stayed and became real
23 good friends. I want to say it was around early August.

24 Q. Of 2017?

25 A. Yeah. It was whatever -- and again, to be

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1 totally clear, it is not my total recollection. It's
2 aided by the thing that I got from the feds.

3 Q. And you had mentioned the things that you got
4 from the feds on several occasions. Those would be the
5 proffers that Mr. Ellicott made?

6 A. Yes.

7 Q. And how did you get your hands on them?

8 A. Mike Shirley.

9 Q. And did Mr. Shirley give you anything else from
10 that exhibit list that has all those proffers that
11 everybody's been looking for?

12 A. Everything I got I gave to you. Every single
13 document.

14 Q. And you know there is a bunch of text messages
15 on that exhibit list between "AB" and Ellicott?

16 A. I do not know that.

17 Q. Did he give you any -- have you seen any --

18 A. I don't think I have, no.

19 Q. -- texts between "AB" and Ellicott?

20 A. No.

21 Q. And how did Mr. Shirley give you those
22 documents?

23 A. We met at Grafton Street, and he would air drop
24 them.

25 Q. And Mr. Shirley, did you discuss with him at

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1 all if he did have the text messages from "AB" that is
2 on that exhibit list?

3 A. There was not like some folder of stuff. You
4 want this, you want -- I didn't get to peruse all his
5 stuff, but just basically everything he had. Everything
6 he gave me I passed on. I am not aware of anything
7 more. It wasn't a great number of things. It was just
8 a handful of things. It was real simple. He said, Hey,
9 I think I have some things that might be helpful to you.

10 Q. And that's how you got those proffers that were
11 produced right before Mr. Ellicott's deposition?

12 A. Yes.

13 Q. Have you seen the government's exhibit list in
14 the Mike Shirley case?

15 A. No.

16 Q. Do you have an understanding that there's text
17 messages on there between Mr. Ellicott and "AB"?

18 A. I don't know why Joe Ellicott would have text
19 messages in a lawsuit against Mike Shirley. I'm not
20 following.

21 Q. Well, the government's exhibit list has those
22 on there, and they have the proffers of Joe Ellicott on
23 there too. So I was just curious as to whether
24 Mr. Shirley had access to all the government's exhibits
25 or -- and how you were able to select which ones --

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1 A. He -- again, I was not selecting. He -- look,
2 again, it was an affirmative thing. I always got along
3 fine with Mike Shirley. I thought he was a reasonably
4 nice guy. He was -- he was getting paid some crazy
5 amount of money by Joel Greenberg from the tax
6 collector's office. I want to say it was like 25 to
7 \$30,000 a month.

8 Q. To do what?

9 A. I don't know. And the only conversation I ever
10 had with him, I think we were in person; but I said,
11 Listen, you need to know something that you're talking
12 about Joel Greenberg. You're talking about the tax
13 collector's office. You are talking about a lot of
14 money. So be prepared because soon or later you're
15 going to have to come answer that question. That was
16 about the only conversation I had with him, but Mike
17 Shirley appreciated the fact that I was affirmatively
18 looking out for him and that was years ago when that
19 happened. It turns out he was giving that money back to
20 Joel and certainly wound up having the stuff. But after
21 that, he said, Hey, listen, I have some things that I
22 think would be helpful to you. Can you meet up?

23 Q. And then he just air dropped them to you?

24 A. Yes, sir.

25 Q. And then you just turned around and produced

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1 them in this case?

2 A. Very shortly thereafter.

3 Q. How long have you known Mr. Morris?

4 A. Since 2001.

5 Q. What were the circumstances of you meeting
6 Mr. Morris?

7 A. I told you. It's halfway between his birthday
8 and my birthday.

9 Q. No, meeting back in 2001.

10 A. Oh, he appointed me to the planning and zoning
11 commission in 2002-ish, 2003 maybe. He was a county
12 commissioner at the time. We had a mutual friend in Jim
13 Stelling. Jim was kind of like a mentor to both of us.
14 Jim passed away last year. So I met him through Jim.

15 Q. And you said he's older than you, Mr. Morris?

16 A. Yes.

17 Q. Approximately what is his age?

18 A. If I had to guess -- see, I haven't talked to
19 Randy. Randy and I had a bit of a falling out because
20 he was the county commissioner that put the rural
21 boundary in Seminole County. So when I decided to do
22 River Cross, he got kind of cross with me over that. It
23 wasn't like a -- I don't want to be overdramatic, but he
24 basically said, You're trying to take down my legacy,
25 and I don't want to be part of it. So, but, yeah, I

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1 mean we would socialize. I want to say he's maybe 75,
2 73. I want to say he was born around 1950, I want to
3 say. If I found out he was 70, I wouldn't be shocked.
4 Somewhere between 70 and 75.

5 Q. And where did you meet Mr. Morris on July 15,
6 2017? Was it on a dock? Was it on a boat ramp?

7 A. He lived in Maitland off a canal. So what I
8 would do is -- well, typically what would happen is I
9 would go -- he brought the boat and had the gas, so I
10 would have brought the food and he would have had the
11 booze probably. That's typically how we do that. So I
12 would go to his house on West Trotters. I want to say
13 it was 323 West Trotters at the time, park, go knock on
14 the door. We'd hang for a little bit. He had a golden
15 retriever. I like golden retrievers. So I usually
16 spend some time with his dog just rubbing its head, and
17 then we would have probably headed out to the boat.
18 Maybe depending on what time of the day it is, might
19 have eaten lunch. Might have brought the food on the
20 boat. I don't really like bringing the food on the boat
21 because it gets nasty and attracts bugs.

22 Q. So 323 Trotters is the location where you would
23 have gone?

24 A. I believe it was 320 -- it's been awhile, but I
25 think it was 323 West Trotters.

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1 Q. Okay. Is that where you would have, you know,
2 stayed until 1:00 morning or whatever and you got up and
3 left?

4 A. Yeah. Whatever -- that was pretty much par for
5 the course. Randy was older than I was, so a lot of
6 times what would happen is we would -- I'd go there.
7 We'd have dinner drinks. A lot of times Randy would
8 fall asleep in his big chair, listen to music. By that
9 point in time, I would either Uber home or have Rebekah
10 come get me if she was in town which she wasn't this
11 time, or pass out myself usually on the couch. Like he
12 had like a man cave. So I would usually go downstairs,
13 and there was a -- I had a bedroom there if I wanted it
14 or there was a couch. And I typically -- I would go
15 crash on the couch. If I woke up at whatever hour of
16 the morning and then drive home.

17 Q. And did he have access to the lakes from the
18 canal that was on his property, 323?

19 A. Yes.

20 Q. So you just went in his backyard, got on the
21 boat, and took it --

22 A. Parking lot, house, backyard, boat, back to
23 that, upstairs to man room, probably passed out on the
24 couch.

25 Q. Back in the summer of 2017, did you ever use

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1 Lyft, or were you an Uber guy?

2 A. No. I was purely -- you know, I was Uber's
3 lobbyist.

4 Q. Okay. How long were you Uber's lobbyist?

5 A. Well, until we passed their bill. I think -- I
6 want to say we got them maybe -- I think '14 or '15
7 probably. There was a conflict because Andy Gardner who
8 was the senate president at the time was very good
9 friends with Roger Chapin from Boone High School days,
10 and Roger was in charge of Mears Transportation. So
11 Andy in his role as senate president would kill the Uber
12 bill every year.

13 And the Uber bill is if you drive from Lake
14 Mary to here, you pass through Lake Mary, Longwood,
15 Maitland, Winter Park, all these things with different
16 sets of rules. So we passed one uniform set of
17 standards for the state in terms of insurance and
18 answering questions like some cities said that if you
19 had the little Uber transponder on but you hadn't picked
20 a ride up yet you were a driver. Other ones said you
21 actually had to have an ride in the car before you were,
22 and that mattered for your insurance and Uber's
23 insurance. We passed one statewide law that sort of
24 took care of all that. It took several years to do. I
25 think we finally passed it in 2017. So after that they

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1 would've -- they didn't need a lobbyist.

2 Q. Okay. 2014 to 2017?

3 A. That sounds about right.

4 Q. All right. Back to the Wells Fargo ledger, I
5 have that up on the screen again. This is Exhibit 106.
6 There is an entry there for Publix.

7 Do you see that?

8 A. (Witness shakes head.)

9 Q. For \$57.52. That would have been you
10 purchasing things to go on the boat?

11 A. Fried chicken, banana pudding, stuff like that.

12 Q. Do you have any recollection whatsoever of
13 going into that Publix in Maitland?

14 A. Yes.

15 Q. You do. Was it with Mr. Morris or by yourself?

16 A. No.

17 Q. Just by yourself?

18 A. By myself.

19 Q. And that would have been you'd go to the Publix
20 then and then go to Mr. Morris' house?

21 A. I get off at the Lake Mary -- I'm sorry,
22 Maitland Boulevard, take Maitland Boulevard all the way
23 down to 17-92, 17-92 to Publix. Publix is probably a
24 half a mile to his house but not far. Very close.

25 Q. Do you recall how long you were on the boat?

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1 A. No. I mean, there is a chain of lakes. We
2 typically would hit all the chain of lakes. A lot of
3 times you go to Dog Island which is the center of Lake
4 Maitland. I don't think we went to the racket club that
5 day. I don't really think Randy was a racket club guy;
6 but, yeah, it would have been that kind of stuff.
7 Probably until the sun went down, give or take. Maybe a
8 little earlier. I don't know if we spent three hours
9 out there. Also would not be atypical for us to go,
10 come back, and go back out. I mean, it's a couple of
11 middle-aged guys chilling out. It's not -- bathroom
12 breaks were probably factored into it.

13 Q. And then you hung out at his house?

14 A. Yes.

15 Q. You didn't go into any restaurants any bars?

16 A. I dont' think so. We normally -- again,
17 Randy -- we were drinking.

18 Q. And what were you drinking that night?

19 A. Bourbon.

20 Q. Is he a bourbon guy?

21 A. Yes.

22 Q. Are you a bourbon guy?

23 A. I am.

24 Q. Any idea how much bourbon you had that night?

25 A. A lot.

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1 Q. Did you guys knock out a bottle amongst you?

2 A. Probably. Again, I don't -- over the course of
3 what was probably seven or eight hours, I would imagine
4 he and I put quite a hurting on 1.75 of Maker's Mark.

5 Q. Do you have any idea what time you would have
6 gone back to 1520?

7 A. I don't.

8 Q. Would it have been in the wee hours of the
9 morning?

10 A. It could very well have been.

11 Q. Could it have been before the sun went down?

12 A. No.

13 Q. Okay. So it would be after dark?

14 A. No, I mean, my expectation is that I probably
15 got back. We would listen -- like Randy would put on
16 like early -- just all sorts of Grateful Dead albums
17 or -- but he would bust out like Neil -- was it Neil
18 Young Live At the Seller Door, playing albums and stuff
19 like that. He was sort of into stuff like that.

20 Oftentimes, if there was a sporting event on -- it was
21 the middle of the summer. He was a baseball fan. I'm
22 not a huge baseball fan. Baseball could have been on.
23 Like it was -- maybe a movie. Again, it was my wife's
24 out of town. It's my buddy. He's kind of a mentor of
25 mine, friend of mine. And we were -- his wife was out

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1 of town. We're throwing it back, having a few
2 cocktails, and hanging out.

3 Typically what would happen is Randy would fall
4 suit before I did. I would -- had to go through some
5 sort of deliberative process of whether I want to Uber
6 home or whatever else it was going to be. And then I
7 would most likely probably go lay down and sleep for a
8 couple hours and wake up because throughout the night I
9 usually don't sleep more than two or three hours in a
10 row. And I would just wake up after a few hours and go
11 home. That is typically what I would do, but, again...

12 Q. Do you think you went back to your house before
13 midnight?

14 A. I don't think so. I don't think so. I mean,
15 it would probably be -- again, it could be early morning
16 hours, but I don't know. If you told me I did, I --
17 normally what would happen is I would -- at the end of
18 that, I would have -- I would -- I would -- I would need
19 Randy -- when we would hang out, the odds are good that
20 I was probably very content to not go anywhere and just
21 sort of sit back, enjoy myself, get some sleep, and then
22 head home whenever.

23 Q. Do you recall having to go back to Randy's
24 house to pick up your car?

25 A. I don't remember that. Not to say it didn't

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1 happen, I just don't remember that.

2 (Exhibit 110 was marked for identification.)

3 BY MR. PERKINS:

4 Q. All right. The next exhibit will be 110, a
5 letter from Mr. Hornsby to Mr. Gee dated May 7, 2021.

6 Do you that up on the screen?

7 A. Yes.

8 Q. And this is talking about the gate ledger and
9 Ms. "B."

10 Do you see that?

11 A. Yes.

12 Q. You're familiar with this letter, correct?

13 A. I am.

14 Q. Okay. And you retained Mr. Hornsby, correct?

15 A. I did.

16 Q. And that was in connection with the feds'
17 investigation into Ms. "B"?

18 A. It was.

19 Q. Okay. And here we have you saying, While out
20 on the Winter Park chain of lakes, Mr. Dorworth took a
21 picture of his friend captaining his new boat. The
22 timestamp of which shows the picture was taken on July
23 15, 2017, at 6:04, correct?

24 A. I'm reading what you're reading.

25 Q. Okay. It says, Which means that Mr. Dorworth

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1 could not have been home when Ms. "B" arrived at his
2 residence. That he was likely not at his residence when
3 he returned from boating which would explain why he had
4 no recollection of meeting her.

5 Did I read that correctly?

6 A. I read what you read.

7 Q. Okay. It says here, When he returned from
8 boating.

9 Do you see that?

10 A. Yes.

11 Q. It doesn't say anything about spending the
12 night at Mr. Morris' house?

13 A. I mean, I was there at 6:00. If I got back at
14 1:00 in the morning, that would not be spending the
15 night at 2:00 or 3:00. I mean, spending the night would
16 be the sun came up, and I was somewhere else.

17 Q. So we know that it was dark out when you came
18 home?

19 A. Yes.

20 Q. But we don't know time it was?

21 A. I don't know.

22 Q. Sometime after 9:00 but before the sun came up
23 on July 16th?

24 A. That would be my best guess.

25 Q. Did you send that picture of Mr. Morris to

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1 anyone?

2 A. What?

3 Q. You took that picture of Mr. Morris on the
4 boat?

5 A. Probably Mr. Morris.

6 Q. That's it, nobody else?

7 A. No. Nobody else would care. My guess is it
8 was is probably one of those things where he said, Take
9 a picture of me so I can send it to my wife, or
10 something like that. Just of us out on the bode boat.
11 I'm not much of a photographer.

12 Q. When you got back home to your house, do you
13 have any recollection of who was there?

14 A. I don't think anybody was there. If they
15 were -- I don't think anybody was awake. If people were
16 asleep, they were asleep. I don't have any recollection
17 of them at all. I didn't have any interaction with
18 people there.

19 Q. You just came in and nobody was up?

20 A. Probably just went to bed. I -- if it's in the
21 middle of the night and I just came back and I'd just
22 been drinking all day out on a boat, I was probably a
23 rocket ship to go to my bed. That would be the best,
24 likely...

25 Q. You don't recall seeing Mr. Ellicott?

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1 A. No.

2 Q. You don't recall seeing Mr. Gaetz?

3 A. No.

4 Q. Don't recall seeing Mr. Fischer?

5 A. No.

6 Q. Don't recall seeing any females?

7 A. No.

8 Q. And your bedroom is upstairs in the Dorworth
9 residence, and it's locked?

10 A. It is.

11 Q. Do you have a key that you use?

12 A. No.

13 Q. How do you get in? Is it a keypad?

14 A. No. Yeah, there was a lock on my door, but I
15 mean --

16 Q. Okay. So guests can get in --

17 A. Yeah, yeah.

18 Q. -- when you're not there?

19 A. Yeah, yeah.

20 Q. But then when you're in there, you lock the
21 door?

22 A. Yeah. There is a latch on the door. I don't
23 have a lock on my bedroom door on the outside with a
24 key.

25 Q. There was a reference here on page two of two

1 that says, What I suspect occurred is that Mr. Ellicott
2 had asked Mr. Dorworth if Ms. MREDACTED roommate, "AB,"
3 could come over, and Mr. Dorworth said yes. And when
4 she arrived at the gate, Mr. Dorworth received a call
5 from the gate and he let her in while still out on the
6 boat with his friend.

7 Did I read that correctly?

8 A. That's what he wrote.

9 Q. Did you have an understanding that Ms. "B" was
10 a roommate of Ms. MREDACTED

11 A. I did.

12 Q. Okay. Where did you get that understanding
13 from?

14 A. Years later I said, How do these people know
15 each other, and they told me they lived together.

16 Q. And who told you that?

17 A. I don't remember. Maybe Joel. I don't know.
18 Joe, I don't know. I have no clue.

19 Q. And did you get a call from the gate about
20 Ms. "B"?

21 A. Well, Mr. Hornsby's explanation -- first and
22 foremost, I don't know if I got a phone call from the
23 gate. It would not be atypical to say like, Hey, you
24 have people at the gate. I had teenage kids. Believe
25 me when I tell you that you can see the traffic in and

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1 out of my house. I think they said I had more visitors
2 than anyone in the neighborhood for like five years in a
3 row because of politics and everything else. Obviously
4 we have a lot of children, kids who were coming through
5 there.

6 So I'm sure they would have known my gate code.
7 You just had to call up and you can call anybody you
8 want in. Or, alternatively, if they did not do that,
9 there is a possibility that I could have received a
10 phone call that would have gone something like this:
11 Hi, this is Mike calling from Heathrow security. You
12 have so and so at the gate. Do you want to let them in?
13 And I would say yes or no. And if I had people over and
14 if people were at the house, I would probably just say,
15 yeah, let them in.

16 Q. Anybody else have authority to let people in in
17 the summer of 2017 other than yourself?

18 A. Rebekah.

19 Q. Just the two of you?

20 A. My kids had stuff. I mean, my kids had a login
21 and stuff too.

22 Q. So your kids could let somebody in --

23 A. I mean --

24 Q. For Ms. "B" it would have likely been a call to
25 you, correct?

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1 A. Well, but the other thing that you have to very
2 seriously contemplate is the most -- and they don't
3 really reflect it like this on here is that I would call
4 and just say, All in. And I think Deanna Sims from
5 Heathrow did say that, that I would just say, All in.
6 You know, Party all in.

7 Q. But, you know -- and I remember her saying
8 that. But if you recall and if you look at the gate
9 ledger for July 15, 2017, remember Mr. Ellicott was
10 denied access, right?

11 A. Yeah.

12 Q. Okay. So it couldn't have been all in
13 otherwise he would have been --

14 A. Well, that's close to midnight. I don't --
15 that's -- well, let's see what time it was.

16 Q. He came in at 11:15, correct?

17 A. 11:15?

18 Q. Yeah.

19 A. Yeah. So, I mean --

20 Q. And it says, Denied, not on list. And then
21 11:16 you let him in.

22 A. Yeah. So somehow -- again, that or somebody at
23 the house said, Oh, we've got to call into the gate.
24 You dial (407) 333-1313, then you type in a four number
25 code. Mine would have been 1424, and everybody at the

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1 house knew. My kids, it's just, you know, people want
2 to get into the neighborhood. And then at the time, we
3 actually learned this from Abby. She was the one that
4 told us. She would get a little notice on her phone.
5 We never had that. I never had that. And we got that
6 after I had the meeting with the feds, and I've had that
7 ever since then.

8 Q. And that was in 2020?

9 A. 2021.

10 Q. Now, when Mr. Ellicott gets to the gate, do you
11 recall having a conversation at all with the guards
12 about whether he should be allowed in or not?

13 A. No. That's not really how it works. First of
14 all, they call. And if -- if he's not let in, that
15 means I didn't answer it because I'm probably sleeping.
16 You know, figuring out what that is, but he probably
17 then called somebody else there and said, I can't get
18 in, and then they called and let him in. They added him
19 on the gate, and he got let in a minute later. That's
20 probably what happened here.

21 Q. Somebody else at the party? Somebody else
22 where?

23 MR. ANDRADE: Object to form.

24 THE WITNESS: Again, this is not a party.

25 BY MR. PERKINS:

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1 Q. Somebody else at the gathering?

2 A. Yes.

3 Q. Okay. And he would have called the landline at
4 your house?

5 A. There's no landline at my house -- well, there
6 is a landline, but there is no phone attached to it.

7 Q. Who would he have called?

8 A. It would have come to my phone. But as I said,
9 it says here I did not let him in, then it says he goes
10 back a few minutes later. That he called me, I answered
11 the phone, I said, Hello, let him in. It could be that
12 I didn't answer the phone, I was asleep, and he called
13 somebody there and said, Hey, Chris isn't letting me in.
14 Can someone let me in, and they called and added him to
15 the thing. He goes back up to the list. Says, Here I
16 am. I'm on the list now. They let him in. That very
17 possibly could happen.

18 MR. ANDRADE: Not to break your train of
19 thought, we've been going for an hour and 45
20 minutes. We're --

21 MR. PERKINS: Right.

22 MR. ANDRADE: That's close to five hours of
23 questioning today.

24 MR. PERKINS: It's a good time for a break.
25 It's 2:29. Want to take ten minutes?

1 THE VIDEOGRAPHER: Going off record. The
2 approximate time, 2:30 p.m.

3 (A break was had.)

4 THE VIDEOGRAPHER: On record. The approximate
5 time, 2:45 p.m., media unit four.

6 BY MR. PERKINS:

7 Q. All right. Very good. Back on the record,
8 Mr. Dorworth. On July 15, 2017, did you have your phone
9 on you the entire time you were with Mr. Morris?

10 A. Probably.

11 Q. There was no time that you lost your phone or
12 misplaced the phone absent from your presence?

13 A. No.

14 Q. When K [REDACTED] M [REDACTED] arrived at the gate at
15 Heathrow at 8:50 p.m. on July 15, 2017, were you at home
16 at that point in time?

17 A. I don't think so, no.

18 Q. And when Joseph Ellicott arrived at the
19 Heathrow Master Association gate at 11:16, were you at
20 home at that time?

21 A. I don't think so.

22 Q. So you believe you were still at Mr. Morris'?

23 A. Again, you know, what I can tell you is I have
24 no recollection of seeing or spending any time with any
25 of those people that night. What I know is that I spent

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1 the day drinking on the lakes, the chain of lakes and
2 partying with my buddy. If I did see anybody -- if I
3 went home at all -- whenever I went home, I probably
4 just upstairs. I don't think I was going to go and be
5 social with anybody. It was probably lights out, but I
6 have no recollection of seeing any of those people at
7 all that day.

8 Q. Is there anybody else other than Mr. Morris
9 that can corroborate where you were on July 15th on that
10 afternoon? Was it just the two of you?

11 A. Just the two of us.

12 Q. And nobody else was at his house?

13 A. No.

14 Q. Mr. Morris; wife wasn't out there?

15 A. I think she was out of town too.

16 Q. Going back to the gate ledger that we were
17 talking about on page five of ten, we're talking about
18 July -- June 22nd, I'm sorry. There is two Uber entries
19 on that date.

20 Do you see that?

21 A. Yes.

22 Q. And then on the next day, June 23, 2017, there
23 is an entry there for 12:25 a.m., and it looks like you
24 are coming in on that day.

25 Do you see that?

1 A. Very possible, yes.

2 Q. And then another Uber at 1:19 a.m.

3 Do you know where you were coming from on June
4 23, 2017, at 12:25 a.m.?

5 A. No.

6 Q. And you have no idea who was in that Uber,
7 correct?

8 A. No.

9 Q. **REDACTED**, does that name ring a bell?

10 A. Yes.

11 Q. Is that somebody that you would be affiliated
12 with picking up a friend of your daughter?

13 A. That's **REDACTED** who's **REDACTED** mom.
14 So, yeah, that's her.

15 (Exhibit 111 was marked for identification.)

16 BY MR. PERKINS:

17 Q. All right. The next exhibit will be 111.

18 A. Yeah.

19 Q. This is the declaration of Mr. Morris.

20 Do you see that up on the screen?

21 A. I do.

22 Q. And did you reach out to Mr. Morris for this
23 document?

24 A. I did not.

25 Q. Okay. That was done through Mr. Beltran?

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1 A. It was.

2 Q. Are you aware of any drafts existing of this
3 document?

4 A. I am not.

5 Q. When is the last time you had primary contact
6 with Mr. Morris?

7 A. Primary election night 2018.

8 Q. And that would have been in August of 2018?

9 A. Yes, sir.

10 Q. And you said you had a falling out with
11 Mr. Morris?

12 A. I didn't have a falling out with Mr. Morris.
13 Mr. Morris just didn't like a project I was doing. So
14 we stopped -- he just stopped hanging out with me.
15 There's no -- we didn't have like some big fight. There
16 was not like some -- it was just Randy thought that his
17 great legacy in local government was that he created a
18 rural boundary in the charter of Seminole County; and
19 outside of that rural -- in the rural area, it did not
20 matter if you annexed property into the City of Oviedo
21 or Winter Springs, the only two who were impacted by it.
22 The County maintained control of that land.

23 It was unique in the state of Florida. There
24 was no other county that had a thing like it. The
25 closest would be Sarasota County, but there's was a

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1 derivation of the rural boundary that Mr. Morris did,
2 and it was done two years later. And I think honestly
3 had the benefit of sort of seeing all the legal
4 challenge things that could happen, there was a court
5 challenge where Seminole County was sued by Winter
6 Springs again. That wound up selling it.

7 Anyway, Randy believes that this was like his
8 great achievement in governance and didn't like the fact
9 that I was trying to undue it by having something
10 removed. I didn't really understand that, but it was
11 very upsetting to Randy that somebody would try to mess
12 with his rural boundary. And Randy was getting older,
13 and -- you know, it was one of those things, like okay.
14 I tried to hire him and he wouldn't do it and that was
15 it that.

16 Q. How did you communicate with Mr. Morris on July
17 15, 2017?

18 A. Probably a text message or a phone call.

19 Q. Text or phone?

20 A. He's a slightly older guy, so a phone call is
21 more likely, but Randy -- if you texted Randy, he'd
22 write you back but sometimes it would take a long time.

23 Q. Going back to the Heathrow master ledger,
24 Exhibit 105, that's in front of you, the paper copy. On
25 July 16, 2017, which is page six of ten, there's an

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1 entry for you coming back at 2:04 p.m.

2 Do you see that?

3 A. I'm sorry, July what date?

4 Q. July 16, 2017.

5 A. Yes.

6 Q. Do you know where you were coming from at that
7 point in time at 2:04 p.m.?

8 A. What day of the week was it?

9 Q. That's Sunday. The 15th was a Saturday --

10 A. Very possibly church.

11 Q. And where do you go to church?

12 A. St. Andrew's Chapel, Sanford, Florida.

13 Q. And would you go to church even if Rebekah were
14 out of town?

15 A. Yes.

16 Q. Do you know when Rebekah got back from Dallas?

17 A. I don't.

18 Q. Would there be any toll roads you'd take to get
19 to church?

20 A. No.

21 Q. Would there be any toll roads you would take to
22 get to Mr. Morris' home?

23 A. No.

24 Q. Did Mr. Morris have two homes back in the
25 summer of 2017, one on Trotters Drive and another one on

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1 Keeneland Pike in Lake Mary? Are you aware of him
2 having two homes?

3 A. Well, I remember his house on Keeneland Pike,
4 but, I mean, he moved from that house to West Trotters.
5 So I don't think -- there might have been a period of
6 time for a week or two while he was moving his stuff
7 over there, but it was not -- I think he was renting
8 both houses too. So I don't believe there was.

9 Q. So on July 15, 2017, when you went and visited,
10 it was the Trotters Drive residence?

11 A. Yes. And by the way, and Randy says in this
12 here which is news to me, that he bought -- I'm sorry, I
13 didn't mean to touch your computer there. It says above
14 there that he bought the boat in 2015. That's -- I
15 thought it was -- I thought it was newer than that for
16 this, but...

17 Q. Yeah, because the letter to the feds says it
18 was a maiden voyage.

19 A. Yeah. And I don't know if it was the maiden
20 voyage. I just remember taking a picture of him on it
21 because he wanted me to do it. If he bought it in --
22 that just doesn't really pencil mathematically to me,
23 but okay.

24 Q. You thought it was a new boat when you went out
25 there in July 15, 2017?

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1 A. I don't think he moved out to this place until
2 after 2015. He moved and got the boat when he was --
3 when he got to his new house. The guy who helped him
4 was Jay -- he could be right about that, but that's news
5 to me. I feel like he had the boat for a much shorter
6 period of time.

7 Q. And you said the guy that helped him was Jay
8 Zimba?

9 A. Zembower. He's the county commissioner of
10 Seminole County.

11 Q. Helped him with purchasing a boat?

12 A. Yes. Found the boat for him.

13 Q. Do you know what boat company he purchased it
14 from?

15 A. I don't.

16 Q. In the summer of 2017, you had a keypad on your
17 house, correct?

18 A. No.

19 Q. How did people get in and out of the home?
20 Would they need a key?

21 A. Yes. I have a keypad now.

22 Q. You have a keypad now, but you didn't --

23 A. No.

24 Q. The only way to get into the home back in the
25 summer of 2017 was with a key?

1 A. Yes.

2 Q. Unless the house was open and people could come
3 in --

4 A. Yes. Right.

5 Q. Did you leave your doors open, or did you lock
6 them?

7 A. No, I locked my doors.

8 Q. Did any of your buddies have a key to your
9 residence back in the summer of 2017 such as Joel
10 Greenberg?

11 A. No.

12 Q. Did Matt Gaetz?

13 A. No. I do think that Joel broke into my house
14 one time when I wasn't there, but I can't prove that.

15 Q. And what facts and circumstances lead you to
16 believe that Mr. Greenberg broke into your house one
17 time when you weren't there?

18 A. Because some people made jokes about it, about
19 how he did it. And I asked him, and he denied it.

20 Q. Who made jokes about it?

21 A. I don't -- I want -- maybe -- I don't remember.
22 I think maybe B [REDACTED] C [REDACTED]. Somebody did. I don't
23 know.

24 Q. When do you believe this took place?

25 A. After this. I don't think it was, but.

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1 Q. After June 15, 2017?

2 A. Yeah.

3 Q. Was it in 2017?

4 A. I don't know. I think it was after that.

5 Q. Did they do anything to your home, vandalize
6 it?

7 A. No. No. Again, I wasn't really hot and
8 bothered by it, or I probably would have gone and done
9 some more research; but it was just somebody -- I think
10 somebody made some kind of -- you think Joel's never
11 here when you're not here, or something like that. I
12 was like, what does that mean?

13 (Exhibit 112 was marked for identification.)

14 BY MR. PERKINS:

15 Q. All right. Next Exhibit, 112, text messages
16 here that you produced between yourself and Mr. Gaetz
17 from October of 2019 --

18 A. That appears to be between me and
19 Mr. Greenberg.

20 Q. Yeah, and then Mr. Gaetz is in there sometimes?

21 A. Yes.

22 Q. And you see this 850?

23 A. Yeah. By the way, the condom in the trash, I
24 just remembered that now.

25 Q. I was just going to ask you about that --

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1 A. Yeah. That was -- I couldn't remember what it
2 was, but I knew it just something, what is this? And I
3 think -- it was not a used condom. It was an unused
4 condom, but it was just, why is this in my trash can?

5 Q. Yes. It looks like, I'm in North Carolina, for
6 your daughter's second birthday; and then Greenberg
7 responds, Does that mean your house is unoccupied.

8 Do you see that?

9 A. Yes -- YEAH.

10 Q. And then you say, Ollie Bacon and his guys are
11 there.

12 A. Ollie Bacon was the guy that did renovations on
13 the house. They did the ceilings and stuff.

14 Q. And then so he was there doing renovation work?

15 A. Yes.

16 Q. Okay. And it's my understanding there was some
17 serious renovations done after the July 15th gathering
18 at your house?

19 A. The last seven years there have been some --
20 yeah, I think it was done years later, but yeah.

21 Q. And what kind of renovations took place?

22 A. Painted and put a bunch of marble up, redid the
23 bar.

24 Q. And then you say, And I pretty much have a one
25 strike rule of leaving used condoms in my trash can for

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1 the wife to see.

2 What do you mean by that?

3 A. I think he -- I remember the condom was unused,
4 but I think I might have been just busting his chops on
5 that one. But he -- again, it was something like an
6 incident where people said, oh, yeah, I think Joel was
7 at your house. And I asked him, and he was like, no,
8 no, no, one of those things. At some point in time, a
9 condom was found in the trash can, and we weren't there.
10 So it was like, what is this? And it was -- my theory
11 was it was Joel. I have no way of knowing, but he lived
12 in the neighborhood by then. So there would be no gate
13 guard. He could just stop by whenever. If he knew I
14 was out of town like the question here.

15 Q. And did Rebecca find that condom in the trash?

16 A. No, I think it was a housekeeper.

17 Q. And do you, in fact, have a one strike rule?

18 A. After -- I would never let Joel Greenberg in my
19 home unattended in the first place. I think I was just
20 being snarky to him right now. No, Joel you will not be
21 coming by my house when he asked if my home was
22 unoccupied. I told him there was a construction crew
23 there and said, you know, after that crap, we're not
24 going to do it. And Joel never admitted to that, so
25 he -- he says I did not leave a condom in your trash

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1 can. So go to the next line.

2 Q. Go to page six of this exhibit. Mr. Greenberg
3 writes, Mrs. Dorworth just throwing Joel under the bus
4 last night. And you respond, What did she do? And then
5 Mr. Greenberg writes, Told Abby I do Molly at your place
6 all the time. LOL. Don't worry about it though. Not
7 trying to cause problems.

8 A. And I only remember one time that Joel ever did
9 Molly at my house, and I remember Rebekah ripping his
10 ass for it. So I'm pretty sure that is probably what
11 it's in reference to, and it's because he told us. We
12 didn't know what he was doing, but he was just acting
13 weird. She said, What's wrong with you, Joel? And he
14 said, I did this or that.

15 Q. When did that happen? When did Mr. Greenberg
16 do Molly at your house?

17 A. When is the time and date of this text message
18 right here? It was like one time he was acting very
19 weird and slept, and Abby called him and said -- called
20 him and he didn't answer. Called Rebekah, and she said,
21 He's sleeping here. And then I think we went to go wake
22 him up and he wouldn't get up. He was literally kind of
23 out of sorts and I think he said something about doing
24 Molly and I'm pretty sure she just reported that back to
25 Abby.

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1 Q. He said something about doing Molly directly to
2 Rebekah?

3 A. Yes.

4 Q. Okay. And what, if anything, did Rebekah do in
5 response that you saw?

6 A. Screamed at him, kicked him out of our house.

7 Q. Has anybody else done Molly at your house other
8 than Mr. Joel Greenberg?

9 A. That would be news to me.

10 Q. Has anybody done cocaine at your house?

11 A. Not that I know of. Again, I get the
12 impression when people do those drugs, they tend to do
13 them in privacy. I don't think it's like -- I don't
14 follow people to the bathroom, but I don't think so.

15 (Exhibit 113 was marked for identification.)

16 BY MR. PERKINS:

17 Q. Next exhibit, 113.

18 A. Yes.

19 Q. Text string here again that was produced by
20 you?

21 A. Yes, sir.

22 Q. I have questions about page two of this text
23 string. It looks like this is corresponding with Matt
24 Gaetz?

25 A. Yes.

1 Q. Okay. And you state, If you need my car -- if
2 you need a car, my key is in the Porsche. Feel free.

3 Did I read that correctly?

4 A. Yes.

5 Q. It's says, Copy, correct?

6 A. Yes.

7 Q. And then there's some reference here to, The
8 orange and blue lights are on to troll me, aren't they?

9 Did you give Mr. Gaetz access to your Porsche?

10 A. What I'm reading here, I probably said -- well,
11 you read what I wrote.

12 Q. So that's a yes, you would have given him
13 access to it?

14 A. Yes. Not atypical.

15 Q. And then you asked Mr. Gaetz what he was up to.

16 Do you see that?

17 A. What day is this? I don't even see that.

18 Q. This is on October --

19 A. Yeah.

20 Q. Do you see that?

21 A. Yeah.

22 Q. Mr. Gaetz, what are you up to? And then he
23 responds, Pool. B^{REDACT}. Vodka.

24 Do you see that?

25 A. Yes.

1 Q. Was he at your house with B [REDACTED] G [REDACTED]?

2 A. I have no idea.

3 Q. It sounds like you were up in North Carolina at
4 this point in time; is that right?

5 A. Yes. I mean, if he is asking if my car is
6 there, he might have been there. He probably was.

7 Q. You say, Sounds like a lovely Sunday.

8 Mr. Gaetz responds, Yes. Sad part is B [REDACTED] has a 6:50 bus
9 home?

10 A. Yes.

11 Q. At that point in time, B [REDACTED] lived in
12 Tallahassee, correct?

13 A. Sure. If you say so, but I don't know where
14 she was at that point.

15 Q. How did you meet B [REDACTED]?

16 A. Through Matt.

17 Q. Did you understand that B [REDACTED] was his girlfriend?

18 A. Yes. They lived together.

19 Q. They lived together in Tally?

20 A. DC.

21 Q. DC. The next entry on page three here says, We
22 are out of 1520.

23 That is your residence, correct?

24 A. Yes.

25 Q. But due to the guard gate issues, the Porsche

1 is at this location, Winn Dixie parking lot.

2 Do you see that?

3 A. I do.

4 Q. And then Mr. Gaetz says, On the way to drop B REDACT
5 and get Botox, right?

6 A. Sure.

7 Q. Did you have an understanding Mr. Gaetz uses
8 Botox?

9 A. I mean, I have no idea if he uses Botox, but I
10 saw some things during the convention that a lot of
11 people seem to speculate as much.

12 Q. Do you know what he was referring to here, But
13 due to guard gate issues, the Porsche is at this
14 location, Winn Dixie?

15 A. I remember him leaving the car there one time.
16 I don't remember why. I don't know.

17 Q. And then you respond, You have a transponder --

18 A. Yeah. I think he was having a tough time
19 getting in through the gate. My guess is on that one,
20 and I don't know this for sure, a lot of times when you
21 pull up there like the thing was in the right place it
22 was sort of wonky with it. I think whereas I would get
23 over there and start rattling it, he probably just went
24 and parked it in the parking lot.

25 Q. And then you had to go to the Winn Dixie

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1 parking lot to go get the Porsche?

2 A. I mean, it's like hundreds of yards from the
3 house, but yes.

4 Q. It's walkable to your house?

5 A. I probably walked there.

6 Q. Would Mr. Gaetz park his car at Winn Dixie and
7 walk into the neighborhood?

8 A. I don't see why he would do that.

9 Q. Could you do that without getting detected by
10 the guards? Could you leave your car at Winn Dixie and
11 walk into the neighborhood?

12 A. Sure.

13 Q. Do people do that?

14 A. It's not a particularly close walk. It would
15 be -- and I guess the closest -- from Winn Dixie it
16 would be a mile. I mean, if somebody wanted to park and
17 then walk in -- I mean, there is nothing that stops
18 people from walking into Heathrow. There's a little --
19 yeah, that could happen, but I have never in mine 19
20 years there ever had anyone do that as a practice
21 because I don't know why they would.

22 Q. Have you ever known Matt Gaetz to do that, to
23 park a vehicle at Winn Dixie and then walk into the
24 Heathrow community?

25 A. I think he was leaving. He was saying he was

1 leaving the car there --

2 Q. Yeah?

3 A. -- and he was going to drop E ^{REDACT} on the bus and
4 then get Botox. My response is, You have a transponder
5 in the Porsche. Which I would use in context clues
6 would suggest that he was probably having a tough time
7 with that so he would do it. So the answer to your
8 question is anyone that wants to could park in Winn
9 Dixie and probably walk into Heathrow if they wanted to.
10 I just don't know why anyone would do that.

11 Q. Do you know how he got to 1520 that day in
12 October, if he had rented a car or had another vehicle?

13 A. No. I have no idea. He's been to my home
14 dozens of times. I couldn't tell you how he got there
15 any of them. So it's...

16 Q. Sometimes he comes with a vehicle?

17 A. Sometimes he comes with a vehicle. Sometimes
18 he gets dropped off. Sometimes he comes and you pick
19 him up at the airport. Sometimes he gets an Uber to
20 your house. Again, he has a very full life and always
21 going places. You know, he is -- he has had staffers
22 come. It's all manners of things. Sometimes he has a
23 car, sometimes he doesn't.

24 Q. Could he have been using the Winn Dixie parking
25 lot because he didn't want to be detected on the gate

1 ledger for Heathrow?

2 A. I mean, I imagine if he didn't want to be
3 detected on the gate ledger he would probably just ride
4 in the passenger seat in someone's car. I think that
5 would be a lot of effort to undertake to achieve
6 something that would be equally doable which would be to
7 just sit in the passenger seat of anybody whose car is
8 driving in versus verses a one mile walk through a golf
9 course over to Heathrow. I still could happen, just
10 doesn't make any sense to me. I don't know why anybody
11 would do that.

12 Q. You could just have B [REDACTED] G [REDACTED] drive the
13 car, and he could be in the passenger seat?

14 A. I mean, like if the guard gate to be very clear
15 does not take inventory of everybody in the car. They
16 don't say, what are you kids in the back seat, none of
17 that stuff. They look who's driving. I think I've
18 discussed this with them as my part of my initial piece
19 of litigation against them. Their belief is that they
20 want to know everybody that comes into and leaves
21 Heathrow. They want to see the transponder. They want
22 to know -- because if anything happens, if a car gets
23 broken into, someone gets hurt, someone gets raped,
24 something like that, they want to have a full and
25 complete accounting of everybody who is there to be like

1 what were you doing in this car. They do not go car by
2 car. So if somebody was riding in the passenger seat,
3 there would be no reflection of that on the guard gate.
4 Although it's bizarre I sent you, it says I think it has
5 Mike Fischer and Eric Foglesong. I truly don't know who
6 that is.

7 Q. Yeah, because the ones you have have that extra
8 category that says, you know, if there is an Uber
9 driver, it says who was riding in the car sometimes?

10 A. But it's not an Uber driver. In that case, it
11 was either Foglesong driving with Fischer or Fischer
12 driving with Foglesong. There was no reason why it
13 would be that way.

14 Q. It looked like to me Mr. Fischer had rented a
15 rental car, and for some reason or another and taken
16 Mr. Foglesong's vehicle?

17 A. It could have been that.

18 Q. I think they would say, you had that --

19 A. We had the crescent moon driveway, so when cars
20 get backed in that does happen with frequency.

21 Q. And then there is here -- Mr. Gaetz -- you say,
22 You have a transponder with the Porsche. Gaetz says, No
23 condom wrappers. Didn't use condoms. If B REDACT is
24 pregnant and it's a girl she is Rebekah. A boy will be
25 Hammond.

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1 Did I read that correctly?

2 A. Yes.

3 Q. Is that referring to your one strike rule about
4 condoms in the trash?

5 A. Probably.

6 Q. Can you bike into the Heathrow neighborhood --

7 A. Yeah.

8 Q. -- without going through the guard gate?

9 A. I mean, you can go through the guard gates. If
10 you show up in the guard gate, it will tell you it's all
11 about vehicles going into the neighborhood. So when we
12 go biking, which we do with great regularity, when you
13 come back, they'll open the gate for you. It's one of
14 those things, but they don't stop you and check your ID
15 or anything. There is also a pathway in. So, yeah,
16 there is -- then there is five different gates, of which
17 three of them don't even have residents. But the point
18 is this: People wouldn't do that. They would just go
19 through the gate. There's no...

20 Q. You have two manned gates, right, and your
21 testimony is they don't take down the credentials of
22 people who would walk in and they don't take the
23 credentials of people who would bike in and they don't
24 take down the credentials of passengers to the vehicles;
25 is that right?

1 A. I believe as a general policy of the
2 neighborhood I have never seen them do that.

3 Q. All right. Going back to the gate ledger for
4 July 15, 2017, and B [REDACTED] G [REDACTED]. We've kind of been
5 chatting about her. At 4:42 your testimony is you were
6 not at your residence at 4:42 on July 15, 2017, correct?

7 A. I don't believe so, no.

8 Q. Okay. When is the last time you have spoken
9 with Ms. G [REDACTED]?

10 A. Probably September of 2020. September 2020.

11 Q. And was that the call at FishBones?

12 A. Yes.

13 Q. And what led you to no longer have contact with
14 Ms. G [REDACTED] after September of 2020?

15 A. I mean, I didn't have frequent contact with
16 Ms. G [REDACTED] before September of 2020. She was dating a
17 friend of mine. When they broke up, you know, I was
18 still nice to her and polite to her. We got along fine.
19 I think she moved out. She went and got a job in DOE,
20 Department of Education, in Tallahassee, got a
21 boyfriend. I saw her, I'd bump into her occasionally
22 just say hello, but I didn't really see her after she
23 and Matt broke up.

24 And then one day I was having dinner with a
25 friend of mine at FishBones, and I received a phone call

1 from Matt. And he said, he's like, Hey, I don't mean to
2 disrupt your day -- this is, mind you, after the
3 conversation we had had with Joel and Abby at the Lake
4 Mary Marriott and then the threats that took place at
5 Another Broken Egg. And says, I don't mean to ruin your
6 night, but it appears that Joel is indeed trying to
7 follow through on making his problems our problems.

8 I said, What does that mean? He said, Well, I
9 just got a phone call today. He did not disclose who it
10 was from, but I do believe it was from B^{REDACT}. He said
11 that -- because I called B^{REDACT} shortly thereafter. He
12 said that, Today there was some grand jury stuff, and
13 apparently your picture and -- your driver's license and
14 my driver's license were put up on the big board for
15 whatever the grand jury thing was.

16 Q. What is your understanding of the date that
17 Ms. G^{REDACTED} and Mr. Gaetz broke up?

18 A. I have no idea. But as I recall, it was sort
19 of an on again/off again thing. Like they'd split then
20 they'd get back together for awhile. It was not -- it
21 was not one definitive thing. It was more of a we're
22 going in different directions, and...

23 Q. And you don't recall seeing Ms. G^{REDACTED} at the
24 home at all on July 15, 2017?

25 A. I don't remember seeing her that day.

1 Q. Did you allow and consent to Mr. Gaetz and
2 Ms. G [REDACTED] hanging out at your house in October of 2019?

3 A. Sure.

4 Q. Like we just watched on this text message?

5 A. Sure.

6 Q. Is that something you regularly allowed,
7 Mr. Gaetz access to your house --

8 A. I mean, listen, when we would go to a music
9 festival on the 30A, he would put us up. Matt is a very
10 generous guy. I don't remember the last time I paid a
11 tab around him. He is very good about -- he picks
12 everything else up. But if Matt was coming into town,
13 he would typically -- like if he had something going on,
14 he'd say, I've got a speech down at Disney. I'm
15 probably not going to come that way.

16 There was another group of friends, the
17 Pirizolos, that he would go over and stay at their house
18 sometimes and then there was my house. And a lot of it
19 I think was driven by geography. If he was -- if there
20 was something near West Orange County or near Disney,
21 he'd probably stay with the Pirizolos. If it was, you
22 know, anything else probably stick around with me. But,
23 yeah, I mean, he's -- at that point in time, he was
24 fresh, new in congress who hadn't really made the world
25 aware of he was yet, but he was close with Trump and he

1 was just highly, highly sought after. I mean, it was
2 speech after speech after speech.

3 Q. Anybody else other than Mr. Gaetz that you gave
4 access to your house to kind of chill out on a
5 weekend --

6 A. Sure.

7 Q. Who would be these other individuals that
8 you --

9 A. Mike Fischer. I mean, like, it's a big house.
10 These are -- Matt's a U.S. congressman and his
11 girlfriend and a friend there. It would not be atypical
12 if they said, Hey, can we hang out here and chill? I
13 would have probably said yes most certainly. I would
14 not have expected K [REDACTED] M [REDACTED] and "AB" to ever be at
15 my house.

16 Q. So other than Mr. Fischer and Mr. Gaetz, what
17 other individuals would you give access to your house
18 to?

19 A. We can go down the list here. Brady Benford,
20 Setzer. He has lived with me several times in between
21 relationships. John Yapo lived with me for years.
22 Let's see here. Let's go down the names I see.
23 Foglesong. Frank Artiles came, and he stayed at my
24 house for several days at a time. Brady Benford. David
25 Workman. I mean, it's -- it's a large home. These

1 are -- like I said, six bedrooms. It's got a nice pool.
2 You know, I like to cook. I like to make food for my
3 friends.

4 Q. Who invited -- have you been able to discern
5 who invited K[REDACTED] M[REDACTED] to your house on the evening
6 of July 15, 2017?

7 A. I cannot glean that, but I can tell you that
8 the only plausible explanation to that would be Joe
9 Ellicott who at the time identified her as his
10 girlfriend.

11 Q. And do you know who invited "AB" to your
12 residence on July 15th --

13 A. I just assume it was K[REDACTED] M[REDACTED].

14 Q. So you believe that Joe Ellicott invited M[REDACTED]
15 and M[REDACTED] invited "B"?

16 A. I mean, that would be my assumption.

17 Q. And who invited Ellicott?

18 A. Well, Joe, again, was one of my clients at
19 Ballard Partners. He worked for the tax collector's
20 office. And, again, I wasn't there; but, you know, it
21 would not shock me if -- again, I don't know why he
22 would be getting there at 11:00 at night. I mean, I
23 don't know where he was. Truly, I have no idea. I was
24 not there, so I cannot give you any insight into what
25 was taking place there. But I would point out too that

1 if you look at this, it says, Not on list, over in tag
2 two which would indicate -- for example, on June 21st
3 where it says -- if you see a tag two --

4 Q. Right?

5 A. Where is June 21st? Where am I here?

6 Q. Page five would be --

7 A. Page five. There is nothing about -- no, I'm
8 sorry. We're in July. Yeah, I mean, like "AB,"
9 somebody called them into the list because it doesn't
10 say not on the list. Joe Ellicott was not on the list.

11 Q. Right.

12 A. So again, if it was an all call in or whatever
13 it was, but, I mean, the reality was probably somebody
14 was at the house at the party called them in because I
15 did not call them in.

16 Q. Somebody at the home called the guard gate and
17 had your code?

18 A. Yes.

19 Q. And put a list together?

20 A. Yes. If I told you 40 people knew that code it
21 would not be the least bit of exaggeration. Again, I
22 have young kids.

23 Q. Have you ever seen Ms. G REDACTED dance with a hula
24 hoop?

25 A. Yes.

1 Q. And what can you tell me about that?

2 A. Well, I mean, she was highly competitive with
3 it. I have never seen a more expensive hula hoop in my
4 life. The thing had LED lights that played to music and
5 it would do all this stuff. It was basically like -- I
6 mean, I believe -- I don't want to overstate this, but I
7 think that she was sort of trying to make it a thing for
8 people when they do like social media stuff and they do
9 the -- whatever things people do. TikTok or whatever
10 things. Like her idea was to do sort of hula hoop and
11 sort of provocative dancing hula hoop stuff. She would
12 do that.

13 Q. Are you aware of the testimony from Ms. M^{REDACTED}
14 and Ms. "B" that Ms. G^{REDACTED} was dancing nude with a hula
15 hoop on July 15th?

16 A. I saw what they said.

17 Q. Okay. Did you ever see Ms. G^{REDACTED} dance naked
18 with a hula hoop?

19 A. Yes.

20 Q. And where did you see that?

21 A. I think it was on Instagram when she would
22 literally have videos of it. It was something that --
23 it was like people that want to get into social media
24 and sort of develop their -- I think that is what she
25 was sort of attempting to do to kind of erotic,

1 contemporary hula hoop stuff.

2 Q. So you have never seen her live dancing naked?

3 A. I don't think so. I would remember.

4 Q. Something she showed a video --

5 A. I think she showed me the video.

6 Q. Ms. G^{REDACTED} showed you?

7 A. Uh-huh.

8 Q. And said, Look at me, I'm dancing with a hula
9 hoop?

10 A. And I'm hanging out here with my hula hoop.

11 (Exhibit 114 was marked for identification.)

12 BY MR. PERKINS:

13 Q. Next exhibit, 114. All right. These are the
14 mandatory initial disclosures that were made by you.
15 And on page two of five here, there is a reference to
16 Ms. G^{REDACTED} and what she knows about the case.

17 Do you see that there?

18 A. Yes.

19 Q. And it says that, She has knowledge that
20 Dorworth did not commit conduct alleged, knowledge
21 regarding "KM", that is K^{REDACTED} M^{REDACTED}, in testimony and
22 statements to authorities' investigation.

23 Do you see that there?

24 A. Yes.

25 Q. Okay. And what knowledge does Ms. G^{REDACTED} have

1 about Dorworth not committing the alleged conduct?

2 A. She would know I wasn't there that night.

3 Q. And when you say not there, you're referring to
4 the July 15, 2017, party?

5 A. Yes.

6 Q. And have you confirmed that with her?

7 A. I mean, it was -- it is what she said back in
8 the day. I think it's been pretty consistent ever since
9 then.

10 Q. When did she say that back in the day?

11 A. Just years ago. She just basically said Chris
12 was not there. Whatever the thing was, and my point was
13 is I don't know these women. I have never met "AB." I
14 think I did meet K [REDACTED] M [REDACTED] one time, but I met her
15 in the context of this and I think my statement there is
16 pretty simple, just that she knows I didn't do that.

17 Q. When did she say, Chris was not there?

18 A. I just -- when -- years ago when it first
19 became -- when we became aware of the existence of a
20 party. I said, I don't think I ever met this woman. I
21 think B [REDACTED] said something to the effect, Yeah, Chris
22 wasn't at it. And I got that secondhand, but, I mean, I
23 believe it to be true.

24 Q. Where did you get it secondhand from?

25 A. I believe I heard that from Halsey Beshears.

1 Q. Any other knowledge she has that you did not
2 commit the conduct alleged?

3 A. I mean, that one seemed to be conclusive that
4 if I was not there at the party, that would be the
5 evidence I was referring to.

6 Q. You also mention here that she has knowledge
7 regarding K [REDACTED] M [REDACTED] and testimony and statement to
8 authorities.

9 What knowledge does she have about --

10 A. Well, I mean, she was the one who -- so just
11 let's go through that night where Gaetz calls me. After
12 getting a phone call like that, it's -- when you are
13 truly innocent of something, it's very disturbing. So
14 the first thing I did is I hang up, finished my dinner,
15 and then I called B [REDACTED]. And I said, I just got news from
16 Matt, and apparently my name was up on the -- my
17 driver's license or something was up on the board.

18 And her response to me was something to the
19 effect of, Yeah, I wasn't really paying much attention
20 because I don't think you are really the center of it
21 but your name -- your picture was definitely up there.
22 And I took a picture a couple hours later because I was
23 like, oh, this is -- while Joel is trying this stuff,
24 this is just confusion.

25 She called me the next morning. So I got up,

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1 went to Liam's, lived my normal life, woke up the next
2 day. Sitting on my back patio, I get a phone call from
3 her. And she says, Hey, I think I got a little bit
4 more. She said, I think it has to do with your house
5 where they might have been. My response was something
6 like, I was not there; and I think she said something to
7 the effect of, I know you weren't, or was just very
8 affirming in that regard. She hung up. Then after that
9 I called my wife, and then I called Richard Hornsby
10 because obviously Joel was getting to work trying to
11 make his problems my problems.

12 (Exhibit 115 was marked for identification.)

13 BY MR. PERKINS:

14 Q. Let's talk about this letter from Mr. Hornsby
15 to Mr. Todd Gee dated October 4, 2021. I'll mark this
16 as Exhibit 115.

17 You're familiar with this letter, correct?

18 A. Yes.

19 Q. And it talks about the evening of September 28,
20 2020, correct?

21 A. Yes.

22 Q. It says, on that evening, you're having dinner
23 with a friend at FishBones in Lake Mary.

24 Who was that friend?

25 A. Kyle Jones.

1 Q. And does Kyle still live in the area?

2 A. No, he never lived there.

3 Q. Where does he live?

4 A. South Florida.

5 Q. What does he do?

6 A. He's a warehouse developer.

7 Q. And at this dinner with Kyle, you get a call
8 from Matt Gaetz?

9 A. I was wrapping up dinner with Kyle. I think we
10 had already paid the tab. We were kind of about to have
11 salutations and part ways, and I think I invited him
12 over to Liam's. I don't believe he joined, but he might
13 have. I don't remember if Kyle joined or not, but we
14 were just wrapping up. I got the phone call, and I
15 believe after that I got on the phone with B [REDACTED]. We had
16 a pretty quick conversation, and then I went on with my
17 life -- well, I don't remember...

18 Q. Who went to Liam's with you?

19 A. I know Jason was there, and it might have been
20 Kyle.

21 Q. I think you have a picture of it.

22 A. Yeah. If you can show me the picture, I can
23 tell you. Kyle was my college roommate's younger
24 brother.

25 Q. Maybe it's on the other one. Here we go.

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1 A. That's Kyle.

2 Q. Okay.

3 A. Really captures my essence.

4 Q. So you get a call from Mr. Gaetz. How long was
5 that call?

6 A. A minute. It was just, Hey, I don't have any
7 more details than this, but I have got the heads up that
8 your name and my name went up on the board. It was
9 Matt, because obviously because he was aware of the
10 threats that Joel had made against Rebekah in my
11 presence. And Matt I think was just informing me that
12 it appeared that Joel and the Greenbergs had actually
13 turned the corner on doing the things that he had
14 promised to do if we didn't get him a pardon.

15 Q. And then in response to that -- there is a
16 reference here to other people were brought up in the
17 grand jury proceedings as well?

18 A. Yeah, I don't know.

19 Q. It says, Mr. Dorworth, Mr. Gaetz, and several
20 other people.

21 Do you know who those other people were?

22 A. I don't. I mean, to be very clear, Gaetz did
23 not tell me who the other people were. He said, Your
24 name and my name. I think he might have said like among
25 others.

1 (Exhibit 116 was marked for identification.)

2 BY MR. PERKINS:

3 Q. And then we have this phone record from B REDACTED
4 G REDACTED. I'm going to mark this as -- this will be
5 Exhibit 116.

6 At this point in time, you text Ms. G REDACTED,
7 correct?

8 A. Yes.

9 Q. And you say, Would you please give me a call
10 when you have a moment, right?

11 A. Yes.

12 Q. You send that text at 7:57 p.m.?

13 A. Yes.

14 Q. And then Ms. G REDACTED looks like calls you back
15 immediately?

16 A. Yes.

17 Q. Do you know how long that conversation was?

18 A. I don't recall it being very long. B REDACTED -- when
19 I called her, she was more like, I don't think this is
20 really about you, Chris. I don't really care. I mean,
21 it was -- if you saw that picture I took just after
22 that, the contents of that phone call were such that I
23 was made to feel that this is not a particularly
24 problematic situation for me. Like maybe they spent a
25 lot of time on Matt and my pictures went up on the board

1 or whatever, but it was -- her response was, Yeah, I
2 didn't really pay much attention because I don't think
3 you're really what they're after here. And then she
4 called me back the next morning to say that she knew a
5 little more, and that it was about my house. Basically
6 they were alleging that people had been at my house.

7 Q. And that's the second call we see on this
8 message here, September 29, 2020, at 10:40 a.m.? You
9 called B ^{REDACT}?

10 A. She -- that's weird. She called -- I don't
11 know. She must have texted me or something else to do
12 that because it was basically her realizing that I
13 had -- that she had more information. I didn't
14 proactively reach out to her that day. So maybe I
15 called her back, but, I mean, I was not -- I honestly
16 had sort of put it out of my head.

17 When I woke up that day, I didn't call Hornsby.
18 I was like, we'll deal with this stuff when the time
19 comes. And when she called back and we talked this
20 time -- and again, I might have called her back, but I
21 think she was the one reaching out to me to say like,
22 Hey, this is...

23 Q. So she may have texted you to say call me --

24 A. Something like that.

25 Q. -- and then you called her back?

1 A. Uh-huh.

2 Q. Going back to this Hornsby letter then, it does
3 say that you -- the next day Ms. G^{REDACTED} calls you and
4 says -- it looks like she provides you additional
5 details she had not had mentioned the night before?

6 A. That's what I said, yeah. We knew the driver's
7 license from the day before. It was the fact that it
8 was about my house. The day before when I called her, I
9 got the impression that she had basically mentioned my
10 name in passing to Matt. Matt was dutiful in calling me
11 to say, Your name did this.

12 But when I called her, she's like, What are
13 you -- I don't think you're the center of this. The
14 next morning when we spoke, it was like, Hey, I got
15 more, and it's because they think something happened at
16 your house.

17 Q. And that would have been on July 15, 2017?

18 A. I mean, we know that now. At the time, I did
19 not know that.

20 Q. And when she says, Something at your house, was
21 that sex with "AB" that was discussed?

22 A. Excuse me?

23 Q. When she said, Something happened at your
24 house --

25 A. No, she never went into the single details of

1 what happened. Her -- the extent of her details to me
2 were that the assumption I had in the moment and I think
3 is still right to this moment in time that they had
4 talked to either K [REDACTED] or "A," and basically, they
5 were -- at the time at least, they were calling and
6 giving details to E [REDACTED] for whatever this was, and that
7 she had she had somehow gleaned -- B [REDACTED] had either talked
8 to them again or figured something else out that said
9 that the questions -- I guess maybe they talked to "A"
10 or maybe she called them back to get more information.
11 She said that it appears that where Chris Dorworth was
12 involved in this about my driver's license being up
13 there had to do with my house, about the location of
14 where it was.

15 Q. The location of the gathering on July 15, 2017?

16 A. I didn't know any of that at this time. It was
17 just all I got was something happened at your house.

18 Q. Okay. So it was very generic?

19 A. In a terrifying way. I mean, like, it was
20 like, Hey, this is happening. I don't really know more
21 details. And so I called her back and she goes -- Yeah.
22 She was very dismissive of me. It was like, Chris, this
23 isn't about you. This is about Matt. And then the next
24 day when she called me back, she said actually it was
25 about your house. So it was like she called back to

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1 tell me that she had -- that there was more details, and
2 she thought that the questions about me had to do with
3 my home.

4 Q. And were the questions relating to drug use at
5 your home?

6 A. At the time I didn't know any of that.

7 Q. What about a minor being at your house on July
8 15th?

9 A. Well, that was about the time -- I mean, yeah.
10 By that point in time, we were aware -- I was aware that
11 these were the girls that were doing this stuff. So,
12 yeah, she would have been telling me -- she didn't say
13 that, but she was like, they think something happened at
14 your house. She did not enumerate one detail past that.
15 And at the time, I didn't know if that -- in fact, I
16 honestly assumed that they had just thought that she was
17 at the house and that it was my home and that sense of
18 the word, I was -- you know, I was supportive of it. I
19 have never met her.

20 Q. At that point in time, the superseding
21 indictment came down on Joel Greenberg, correct, in the
22 midst of 2020?

23 A. If you tell me so. Again, I don't -- no, was
24 that -- the first one was in June.

25 Q. Correct. And then there was a second one in

1 August, correct?

2 A. That involved the girls.

3 Q. That involved the girls?

4 A. If that was in August, you tell me. That --
5 again, I mean, it was just several months later. I
6 remember when it came out, but that was -- that came out
7 after I had the meeting -- after Rebekah had gotten
8 threatened by Joel at the JW Marriott and after he and I
9 had an exchange at the Broken Egg.

10 Q. So July you have -- they have the -- July of
11 2020, Rebekah has the exchange at the JW Marriott in the
12 pool with Joel Greenberg?

13 A. I don't know what the date was on that one.
14 I'll take your word on that one.

15 Q. You sat through your wife's deposition,
16 correct?

17 A. I did.

18 Q. And we talked about that July event?

19 A. Yeah. Again, just from a point of plotting
20 things on a calendar, I don't want to tell you that I
21 know what the date was. It's all just blocked together,
22 but I know it was before this.

23 Q. Okay. Now, the September 19th -- on September
24 29, 2020, did you get the gist from B[REDACTED] that the
25 feds thought that underage -- and underage girl partied

1 at your house at some point in time?

2 A. I mean, at the time, if it was post superseding
3 indictment, I was probably astutely aware that there was
4 one girl that was the particular subject of this, and I
5 think I had by that point in time figured out -- you
6 know, I had asked somebody, and they told me it's this
7 person.

8 And I looked her up on social media. I
9 couldn't find her. I couldn't find like any -- I don't
10 think I was able to find the Instagram or anything like
11 that, and then I found -- I said that. They said, well,
12 you've got to look under her stage name which was R[REDACTED]
13 R[REDACTED] which is her porn name, and that was an eye
14 opening experience.

15 Q. When is the first time you looked up R[REDACTED]
16 R[REDACTED]?

17 A. Whenever someone told me that's who it was.

18 Q. Would it have been around --

19 A. I don't know. You're asking me to speculate on
20 things. Whenever -- because obviously out of nowhere I
21 got -- Joel had hundreds of these women over a period of
22 years. One of them happened to be underage. Joel gets
23 ensnared in that. He's got all these problems there,
24 but Joel's goal in life was to make it not just Joel's
25 problem. He wanted this to be a team thing. Everybody

1 had to be in this together.

2 The problem is I don't think anybody else did.
3 I know I didn't. I don't think Matt did. I think that
4 Joel -- I guess Joe Ellicott -- well, that was kind of
5 interesting during their testimony because K[REDACTED] said
6 that she didn't ever have sex with Joe Ellicott and Joel
7 and "AB," but "AB" said that K[REDACTED] had sex with Joe
8 Ellicott and Joel. It was always very confusing to me
9 because I'm getting -- I'm the one person who never had
10 sex with this person. I don't think Matt ever did,
11 certainly not as a minor.

12 But that's -- I don't know about that. But I
13 never met her, and I'm getting sued by the -- I'm
14 getting threatened to be sued when the people who we
15 know now did have sex with her never got sued. And so
16 it was just very -- I thought that was very compelling
17 evidence that it was being encouraged along by none
18 other than Joel Greenberg.

19 Q. In this letter from Mr. Hornsby, page two up on
20 the screen, it says, I assume Ms. G[REDACTED] received
21 additional information from Ms. M[REDACTED] after a previous
22 phone call with Mr. Dorworth.

23 Why did -- why was that assumption made that
24 she got that information?

25 A. Well, she called back the next day to say --

1 Q. That I talked with K[REDACTED] or something?

2 A. No. She didn't say that. She said, I know
3 more, and I didn't know honestly. At the time there,
4 the indictment before I was nervous when I got the phone
5 call that I was made to feel better by the B[REDACTED] follow up
6 phone call. The next morning had the inverse effect. I
7 was like, my god, they're going to try and say this crap
8 happened at my house. It didn't. I don't need this. I
9 don't want this. And so she called back and the next
10 day I had that -- and she -- when she called me, she
11 said, I know more. I remember her saying, I know more.
12 And what she knew differently is that it was centered on
13 my house.

14 Q. It was centered on your house, and it was
15 centered on a minor being present at your home?

16 A. The girl that Joel had the problems with.

17 Q. "AB"?

18 A. "AB" claiming being at my house at some point
19 in time which was truly news to me.

20 Q. And you're assuming that was K[REDACTED] M[REDACTED]
21 why?

22 A. I'm sorry, what?

23 Q. Why is that assumption made that it came from
24 K[REDACTED] M[REDACTED]?

25 A. I'm sorry, what are you referring to?

1 Q. You see where, I assume Ms. G[REDACTED] received
2 additional information from Ms. M[REDACTED]?

3 A. Yeah. I mean, I think the gist of the
4 conversation was -- the conversation was between [REDACTED] and
5 K[REDACTED] M[REDACTED], and K[REDACTED] was supposed to be with -- I
6 think K[REDACTED] was the one talking to "AB." But I --
7 again, I -- I called -- I talked to B[REDACTED]. It was a very
8 brief conversation. She shared the details of what it
9 was. I called my wife, told her. I called my lawyer.
10 That was it. Joel was doing what he promised he would
11 do.

12 Q. Page six of this document talks about an
13 affirmative response to Ms. G[REDACTED] 2019 offer to share
14 cocaine she was purchasing?

15 A. That was nonsense. There was a text that they
16 said -- and I don't think I ever even saw these texts,
17 but they warranted to Richard that these texts existed.
18 He was just responding to that, but I never purchased
19 cocaine from B[REDACTED] G[REDACTED] nor would she try to sell
20 that to me. I don't know what that's about.

21 Q. You have never seen a text message exchange
22 with Ms. G[REDACTED] where she offered cocaine or anything?

23 A. I think somebody described something talking
24 about white. I do not -- I don't use cocaine, so I
25 would not be purchasing that. By the way, 2019, offer

1 to share cocaine she was purchasing for the wild party.
2 I don't know. Again, this seems to me like this was
3 years after the fact, but I never bought any cocaine
4 from B[REDACTED] G[REDACTED] so I don't --

5 Q. And you --

6 A. But the way that conversation happened was
7 Richard called up and said, Hey, you know, we have
8 cooperated with you guys. We sat through the interview.
9 We turned over large batches of information, and we
10 didn't hear anything from them. It just kind of went
11 dark. So Richard after some period of time did a status
12 call with them, and, you know, I remember I was sitting
13 at a Corona Cigar Bar, and he said, You got a second?
14 He said, You might want to step away from the table.

15 And I said, Yeah what's up, man? He said,
16 Well, they said they have kind of moved on from the
17 sexual component of this, and now they're convinced that
18 there might have been some obstruction of justice going
19 on with all this stuff. So again, they warranted
20 several things to Richard over the phone. They never
21 showed us. They never showed me a copy of the text and
22 everything. They just said, We have this. And so
23 that's all I know. I have never -- they didn't say, We
24 have this. I don't think the feds do that a lot
25 actually. So they did not share anything. So they --

1 Q. They didn't seize your phone though?

2 A. No. My understanding is the only two people
3 who had their phones seized were Matt and B^{REDACT}, and Matt
4 and B^{REDACT} have one thing in common. They did not respond
5 to the subpoena from the federal government. I did. I
6 just said give me a time to comply with this. I'm not a
7 U.S. congressman. I'm not in a position to post up in
8 that battle.

9 My understanding is that the two people who got
10 their phone snatched were B^{REDACT} and Matt, and they were
11 both done on -- they just come and snatch it. Basically
12 like, FBI, give me your phone, and then you're gone.
13 And Matt didn't get his back for several years because I
14 think it was encrypted, and I don't know if they ever
15 broke the encryption on it. I don't even know if Matt
16 got the phone back. Probably could, but I don't know
17 about B^{REDACTED} phone. I never talked to her about that.

18 Q. Did you turn over text messages and emails to
19 the feds?

20 A. Yeah. Everything I have, I have given to you.

21 Q. And you have turned over the same materials to
22 us?

23 A. Identically. Again, most of my text messages
24 were wiped out by virtue of the fact that I had a one
25 year rule on my phone that just deleted texts in one

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1 year.

2 Q. Going back to the mandatory initial disclosures
3 that we previously marked. A few questions about some
4 of these folks that you have listed on there.

5 A. Sure.

6 Q. You say Halsey Beshears --

7 A. Halsey.

8 Q. Always Beshears, contact information unknown,
9 knowledge regarding similar acts by Greenbergs against
10 Beshears investigation and resulting damages.

11 What is that knowledge regarding similar acts
12 by --

13 A. Well, Halsey was the secretary of the
14 Department of Professional Regulation under Governor Ron
15 Desantis. When Covid happened and Florida sort of led
16 the country in terms of its response, Halsey was the guy
17 who was in charge of the agency doing it. So, you know,
18 Halsey was very high profile, and what Joel wanted to do
19 who Joel wanted to drag whoever he thought could have
20 impact and that would -- if they got prosecuted would
21 be -- sort of please the DOJ so that he could get
22 reductions in sentence. And he went after Halsey, and
23 Halsey didn't do anything. I mean, this is all
24 nonsense. These guys were single, decent looking guys
25 who came from resources, politically prominent. The

1 idea that they would have to pay for sex is utterly
2 ludicrous to me.

3 Q. And what's your understanding of how Joel
4 Greenberg came after Mr. Beshears?

5 A. Trying to suggest that he was -- you know, he
6 had information. Joel went and gave them all the
7 information which they used to generate the subpoena.
8 And it's the collective wisdom of all of us that
9 basically Joel or his attorneys, Dave Webster, acting on
10 behalf of the Greenbergs and/or Joel, gave a copy of the
11 copy subpoena to the New York Times, and that was the
12 piece of information they used to -- you know, to
13 basically start the ball rolling on Matt.

14 Q. What activity did Mr. Greenberg suggest
15 Beshears was involved in? Was it --

16 A. I believe he suggested they went on some trip
17 down to the Bahamas that was the Man Act trip.

18 Q. And that trip would have involved "AB" and
19 K[REDACTED] M[REDACTED]?

20 A. I believe it was "AB" and K[REDACTED] M[REDACTED] after
21 they were the age of 18. But Halsey flew them in his
22 plane. Matt met them -- I believe Matt flew commercial.
23 I don't know who else -- I think Jason Pirozzolo was
24 there too. He had an airplane too. I think that it was
25 his girlfriend. I was not on that trip. That would not

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1 be the kind of thing I would do.

2 Q. And you said it was the Man Act trip?

3 A. Yeah. I mean, the Man Act is I think the human
4 trafficking -- I think it was white slavery from what I
5 read the history of the act. Like it used to be called
6 the White Slavery Act. Now they call it the Man Act,
7 and the way I read it was more or less any time anybody
8 travels or leaves the country for the purpose of doing
9 anything wrong, they kind of use the Man Act. Although,
10 again, I'm not an attorney. I believe the only person
11 that's been prosecuted under the Man Act lately is R.
12 Kelly. So, I mean, if you want to know how rare that
13 is, it would be none other than R. Kelly.

14 Q. Is the Man Act used at least to your
15 understanding if you transport minors across --

16 A. What was your question?

17 Q. Go ahead.

18 A. I'm sorry. I don't believe that it's exclusive
19 to minors. I think that the way -- and again, I
20 actually believe this was explained to me from none
21 other than Katie Benner with the New York Times. She
22 said that when you are 18 years old, there is a
23 different standard for human trafficking than if you
24 were under 18 years old. I want to make sure I give
25 you -- this is how she explained it to me.

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1 She said if you are over 18 years old. So if
2 the girl -- the woman who is being trafficked is 18 or
3 older, then there is an incumbent burden upon the
4 prosecution or they were suing or whatever to show that
5 there was coercion. The examples they gave me of those
6 coercion would be like if somebody gave their -- got
7 them hooked on heroin, which I think is done sometimes,
8 or if they had their mother or child and said, We're
9 going to hurt your child unless you prostitute yourself.
10 That would be considered acts of coercion.

11 If you're under the age of 18, all that it
12 requires is that you receive something of value. And
13 there is even a threshold in there that says -- so I
14 believe that the -- my understanding of at least the way
15 it was explained to me by a journalist who is also not a
16 lawyer was that there was a different threshold for over
17 and under 18.

18 And I think that the standard for what it is,
19 if you had the right to sort of inspect and see -- if
20 you don't look like -- you know, let me see some ID. I
21 mean, if you have some right to see some people, you
22 have some debt or burden on that. My understanding was
23 that because she was over the age of 18, there was a
24 trip down there -- I remember when it happened. Like
25 Halsey came back, and when he got back, he had been a

1 state legislator -- and actually, this was before --
2 this was 2000 -- I don't know when that trip was, but I
3 think it was 2018. But he was either a member of the
4 legislator, but as a member of the legislator, he also
5 owned a bike shop.

6 So when you fly, when you're a politician,
7 pretty much the worst thing you can do is start dropping
8 knowledge on people about how you're a politician
9 because that gets you in trouble all -- real quickly.
10 When you get pulled over by a cop, you would never say,
11 I'm a member of -- you just don't do that. You just try
12 to be as non-addressing of that as you can possibly be
13 because it's not terribly hard for people to misconstrue
14 that and take it the wrong way.

15 So when Halsey got back, I think he was flying
16 into the country. Customs had him, and they said, What
17 do you do for a living? He's like, I own a bike shop.
18 And they Google quickly and saw that he was a state
19 legislator. So all of a sudden, there is a discrepancy
20 or something. They put Halsey into one room and the
21 girls in the other room. I think K[REDACTED] was like 20 at
22 the time, I believe.

23 But that had happened, so I remember hearing
24 about that trip. It was more of a funny thing that they
25 thought that was taking place. I had no idea that there

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1 would later be actually an investigation around human
2 trafficking, but I think Joel tried to -- Joel was not
3 on that trip, and I think he tried to get them to try to
4 say that that was the behavior that, you know, she
5 was -- it was an 18 and 20 year old that flew down with
6 Halsey. I think it was a different matrix of liability.

7 Q. Any other misconduct that you're aware of that
8 Joel Greenberg suggested that Mr. Beshears was involved
9 in?

10 A. No. I think he basically suggested that he was
11 involved in all of this stuff, and I don't -- if you're
12 referring to the 122 pages or 117 pages -- I really do
13 have to figure that out, whatever it is. 117 or 122, I
14 believe always is mentioned in there in that thing. I
15 don't remember the context of how he was mentioned. But
16 I mean basically what Joel did on that was he tried to
17 hit as many people as he possibly could. I think he
18 went through the paper and said, who do they like to
19 write about. And so, I mean, I think he basically
20 suggested that he was part of that. He was -- I'm not
21 going to speak to what other things Joel might have
22 tried to say about Halsey because I don't think Halsey
23 did anything wrong.

24 Q. The biggest thing that comes to the mind is the
25 trip to the Bahamas?

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1 A. Well, I mean, that's -- I think that was the
2 subject of the greatest area of investigation, and I
3 think they -- again, make no mistake about it, when Matt
4 Gaetz is involved and he's a U.S. Congressman who from
5 time to time finds comfort in going on major news
6 stations and calling out the Department of Justice and
7 the FBI and other things. So I don't think there was
8 any shortage of people over there that wanted to make
9 sure that he was doing that. But what I think Joel
10 tried to do was basically paid as many of these people
11 as he possibly could.

12 Q. You also have a reference there to David
13 Webster. We talked a little bit about this before.
14 Knowledge regarding the summation of derogatory
15 information about Dorworth.

16 A. Yes.

17 Q. What knowledge does Mr. Webster have in that
18 regard?

19 A. I mean, I don't know. He's their attorney.
20 I'm not able to do it, but, I mean, I know that I was
21 told I had a David Webster problem, that he's the one
22 out trying to pedal the goods on behalf of the family.
23 He claimed he was not Joel's attorney at the time. I
24 believe just -- but he was the family attorney, so he
25 was acting on behalf of the Greenbergs and possibly

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1 Abby. But then actually at the moment of Joel pled
2 guilty, Dave Webster added himself as an attorney in
3 Joel's case at that point in time. So he wasn't Joel's
4 attorney but he became Joel's attorney. I think that
5 was the way that they tried to get around saying this
6 information came from Joel Greenberg's attorney, but it
7 came from his parents' attorney.

8 Q. Do you have any information about specific
9 statements that Mr. Webster made --

10 A. No.

11 Q. -- that was derogatory towards you?

12 A. Basically going around telling people that I
13 have all these issues and that Gaetz and I are going
14 down and that Joel's going to get out. Just basically
15 going around trying to be -- he said something to some
16 judges a few weeks ago up in Seminole County. Someone
17 said, yeah, Dave Webster was talking about you. I mean,
18 I think he just continues to do it.

19 Q. And what judges were those that told you that?

20 A. Judge Melanie Chase.

21 Q. Mr. Gaetz maintains that he was not at the July
22 15, 2017, gathering --

23 A. I have no idea.

24 Q. You haven't asked him about it --

25 A. I haven't asked him about it.

1 Q. It's your testimony though that you did not see
2 him?

3 A. I mean, I was not there, so I don't know. If
4 they came there and B^{REDACTED} showed up and Matt was with
5 them, I was not there to observe it. I do not know. I
6 have not asked Matt. I have no idea.

7 Q. Have you discussed with Matt whether he had sex
8 with "AB"?

9 A. Yes.

10 Q. And what, if anything, did Matt say in
11 response?

12 A. He did not have sex with "AB".

13 Q. Ever?

14 A. I didn't ask about ever. I said, is there
15 anything -- he said there is absolutely no truth
16 whatsoever. I did not say, did you ever sex with her
17 any time? I don't know. He didn't say yes; he didn't
18 say no.

19 Q. You did limit it to when she was a minor?

20 A. Yeah.

21 Q. You asked him, did you ever have sex with "AB"?

22 A. I did.

23 Q. And what did Mr. Gaetz say --

24 A. Absolutely not. Hell no.

25 Q. Did you ever ask Mr. Gaetz if he had sex with

1 K[REDACTED] M[REDACTED]?

2 A. No.

3 Q. Do you know if he had sex with K[REDACTED] M[REDACTED]?

4 A. Well, K[REDACTED] M[REDACTED] said she had sex with him,
5 but then "AB" didn't seem to know if she had sex with
6 him. So I -- the thing I didn't really contemplate when
7 this whole thing started was the idea that people would
8 lie themselves into these stories because of Matt's
9 political celebrity. And having watched the depositions
10 of K[REDACTED] M[REDACTED] and "AB," I truly believe that is what
11 happened. I think that they were trying to sort of
12 write themselves into it somehow for the purpose of, I
13 don't know, getting paid or whatever the deal was. But
14 they -- very clear they did not know what they were
15 talking about.

16 They did not -- their stories did not jive.
17 There was -- and I think to a certain degree K[REDACTED] was
18 concerned about implicating herself and the fact that
19 she knew that "AB" was under the age of 18 and was the
20 allegedly going to have sex with people and had sex with
21 her.

22 I mean, that was the testimony from "AB" that
23 she had sex with K[REDACTED] M[REDACTED], Joe Ellicott, and Joel
24 Greenberg that first night. K[REDACTED], curiously, did
25 not -- omitted that detail saying that she never had sex

1 with "A," but my guess is that's because she never faced
2 charges for human trafficking which by a very standard
3 definition of the law a person who committed the human
4 trafficking would be K^{REDACTED} M^{REDACTED} because she
5 brought -- she brought her. She invited her, and, you
6 know, she was aware that she was underage and all those
7 things. And I did not -- it didn't seem to dissuade her
8 at all.

9 Can I have a break in about five minutes? Just
10 keep going. I have to use the restroom soon.

11 Q. Just let me --

12 A. Just the next time you hit a breaking point.

13 Yeah.

14 Q. Did you see Mr. Joel Greenberg at all on July
15 15, 2017?

16 A. I don't think so.

17 Q. Mr. Foglesong, did you see him at all on July
18 15, 2017?

19 A. I think Foglesong and Fish were probably --
20 they did some work together on stuff. And, again, Matt
21 has a thorough dislike for Eric Foglesong. So if Matt
22 had seen Eric Foglesong, Matt would have left. He would
23 have said, I'm not doing this, you know, whatever. But
24 Mike Fischer, he was involved in different pacts and
25 political committees and everything. I think Eric would

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1 use him for various things.

2 Q. Eric works for his -- historically works for
3 democratic --

4 A. Yes. He --

5 Q. -- candidates?

6 A. I mean, he ran the democratic caucus for the
7 state of -- State House in Louisiana. He ran the
8 democratic caucus for the State House in Nevada. He ran
9 the election of John Bell Edwards -- I believe that was
10 John Bell Edwards who is the democratic governor of
11 Louisiana. They have a very weird system for electing
12 people there where it's not like Florida where you have
13 a republican, a democrat, and an NPA. It's like a
14 progressive poll where you've got to like get to a
15 certain percentage.

16 And Eric, he won a governors race there in
17 Louisiana which is incredibly impressive in the south to
18 ever win a governorship these days as a democrat. It
19 takes a lot. He ran a U.S. senate race and lost a seat
20 that was -- ultimately went to John Kennedy. Then Eric
21 went down -- who was the guy? He was worth like \$3
22 billion. Don't answer that. But he was the democrat
23 that ran for governor against Ron Desantis, and Eric was
24 his campaign manager -- Jeff Greene. Jeffrey was his
25 name. And so he -- Jeff Greene was worth about three or

1 four billion dollars and decided he wanted to come in
2 and be governor and spent all sorts of money. And
3 Eric -- that didn't happen. So Eric -- throughout all
4 these things, Eric is a national political consultant
5 who Matt Gaetz would have viewed as highly unwelcome in
6 his presence.

7 MR. PERKINS: All right. It's 3:52. Let's
8 take a break.

9 THE WITNESS: Thanks.

10 THE VIDEOGRAPHER: If there are no objections,
11 going off record. The approximate time, 3:53 p.m.

12 (A break was had.)

13 THE VIDEOGRAPHER: On record with media unit
14 five. The approximate time, 4:03 p.m.

15 BY MR. PERKINS:

16 Q. Back on the record. Mr. Dorworth, is it
17 possible that you were home when K[REDACTED] M[REDACTED] came to
18 your residence on July 15, 2017?

19 MR. ANDRADE: Object to form.

20 THE WITNESS: I don't know what time K[REDACTED]
21 M[REDACTED] came. I don't know. No, I think she was
22 later.

23 BY MR. PERKINS:

24 Q. She came in at 8:50 p.m.

25 A. No, I don't believe I was there.

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1 Q. And you can state with absolute certainty that
2 you were not at your house at 8:50 p.m. on July 15,
3 2017?

4 A. I can't state with absolute certainty anything
5 like about that, but I don't believe I was at my house.
6 I think I was at Randy Morris' house drinking. A couple
7 hours after I was on the boat, and I don't think I was
8 home. So I believe I got home either later in the night
9 or the next morning, but I do not think I was home by
10 the time she got there.

11 Q. Okay. And what about Mr. Ellicott at 11:15
12 p.m. on July 15th --

13 A. I don't -- again, if I had gotten home at 11:15
14 p.m. if I was there, I would have been in the front door
15 at 11:10 and asleep at 11:12. I would have gone up the
16 stairs, maybe brushed my teeth if I was lucky, and gone
17 to sleep. I don't have any recollection of seeing Joe
18 Ellicott or anybody else at 11:15.

19 Q. Is it possible that you were home at 11:15 p.m.
20 on eastern on 7/15?

21 MR. ANDRADE: Object to form.

22 THE WITNESS: Again, I have answered this
23 question repeatedly. I'm not going to do it again.

24 BY MR. PERKINS:

25 Q. When you were out on the boat with Mr. Morris,

1 do you recall getting calls from the gate?

2 A. No.

3 Q. Do you recall getting any calls from the gate
4 that day, July 15, 2017?

5 A. I, as a general rule, don't ever recall getting
6 calls from the gate. That's I get calls from the gate
7 all the time. The call says, Hi, this is Mike with
8 Heathrow security. Let them in. That's how it goes. I
9 don't have any recollection of talking to anybody, no.

10 (Exhibit 117 was marked for identification.)

11 BY MR. PERKINS:

12 Q. All right. Next exhibit will be 117. This is
13 the initial complaint that was filed in state court and
14 then removed to federal court.

15 Do you see that up on the screen?

16 A. I do.

17 Q. Okay. And there is a reference to "KM" in the
18 complaint.

19 Do you see that?

20 A. Yes.

21 Q. And that's K [REDACTED] M [REDACTED], correct?

22 A. Yes.

23 Q. All right. And it says, Dorworth was aware of
24 the existence of a person with the first name of "AB"
25 via a tax collector employee and friend and former

1 roommate of Joel Greenberg to be dating a "KM".

2 A. The way I read that statement is that I became
3 aware of that person down the road. I didn't know "AB"
4 back then, never spent time with her, didn't know her,
5 but became aware of the fact that this person existed --
6 well, through all of this.

7 Q. And this tax collector employee, that was Joe
8 Ellicott, right?

9 A. Joe Ellicott, yes. And, again, there is a
10 little confusion I think on that probably on your end
11 because K[REDACTED] decided that she -- during her
12 testimony, she said she wasn't dating him. Believe me,
13 Joe definitely thought they were dating, and they
14 actually referenced that in one of those proffers from
15 the federal government that he thought they were
16 together. Relationship ended a few weeks later.

17 He was very serious about it, was talking about
18 marrying her, was asking -- you know, I had just -- I
19 had been married before and had a baby on the way, and
20 he was asking my wife girlfriend -- my wife at the time
21 -- well, my wife Rebekah, she's 12 and a half years
22 younger than me. So he was asking me questions like how
23 do you do that? How do you kind of make it -- he was
24 very excited about having a potential future with her.

25 So that is the context that I knew of her as

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1 this girl who is very young and beautiful and really did
2 it for him, and she seemed to like him too. And so he
3 was kind of hurdling towards the -- being in a
4 relationship with her. And then two weeks later, he
5 found out she had several videos of her with other
6 people out doing very graphic things. I mean, and
7 Joe -- Joe and Joel did a lot of weird sexual things.
8 They were into that stuff. He was shook by whatever he
9 found. So, I mean, I think it was pretty -- he's like,
10 I just I can't believe it. He was really bothered by it
11 all.

12 Q. It says here that, Dorworth was aware of the
13 existence of a person with the first name of "AB" via a
14 tax collector employee. Joe Ellicott --

15 A. A first name of "AB." I don't -- first name is
16 not "AB." It was the tax collector employee and
17 friend -- it would be...

18 Q. Did Joe Ellicott make you aware of "AB"?

19 A. No. I mean, I don't know.

20 Q. Is this an error, paragraph 440 of the initial
21 complaint?

22 A. What I would do is say I would say that it is
23 a -- I am aware, but I was not aware of it back then
24 that there was that person. I am aware of it, but I
25 found out about them from Joel, and I knew "AB" as being

1 the best friend and I thought roommate of "KM". But I
2 was always under the impression they were roommates,
3 although her testimony was contrary to that. But, I
4 mean, I am still aware of this. I am aware -- I was
5 aware. I don't think back then -- at the time in 2017,
6 I don't believe I would have known who these people
7 were, but I would have known that "KM" was there.

8 So if you take the -- if you read the sentence
9 in the context of in July or June of 2017 I was aware,
10 that would be incorrect. If you read it now, I am
11 aware -- I was aware of the existence of such a person
12 like this because of being K[REDACTED] M[REDACTED] roommate.
13 That would be accurate.

14 Q. When is the first time you became aware of a
15 person that existed with the initials "AB"?

16 A. I don't --

17 MR. ANDRADE: Object to form.

18 THE WITNESS: I don't -- the name "A," I think
19 that would have come after Joel was charged with a
20 crime.

21 BY MR. PERKINS:

22 Q. After August of 2021?

23 A. Yes.

24 Q. So it's your testimony the first time you heard
25 the name "AB" was in August of 2020?

1 A. "AB", yes. I mean, he made reference to [REDACTED]
2 in the text, but I don't know that as "AB." The first
3 time I found out her name because I went to go find her
4 one weekend, and then I had to go find her by using the
5 name R[REDACTED] R[REDACTED].

6 Q. And did you do that when you reviewed the
7 August indictment? Is that when you went digging around
8 for that?

9 A. Yeah.

10 Q. Was it sometime in the month of August 2020
11 that you would have done that?

12 A. I did not ask Joel. I don't think Joel told me
13 who it was. He kept trying to sell this thing like [REDACTED]
14 v[REDACTED] 99. I very much believe that all Joel was doing
15 at that point in time was trying to rope me into things.
16 The text message he sent me was nonsense. If you read
17 my responses to him right away, I'm like, what are you
18 talking about, and, stop doing this Joel.

19 Joel was not -- again, Joel had -- he has a
20 clever mindset. He's kind of -- if you think about life
21 hacks, he's one of those people. He's very impulsive.
22 He says and does dumb things. You know, I -- you know,
23 when Joel first made me aware -- when he threatened my
24 wife and we went to Another Broken Egg and he mentioned
25 the existence of "AB," I didn't know who she was. I

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1 went and asked others. Again, I was just like who is
2 the girl? And when the -- I think about that time I
3 probably did the research. Again, I don't know what day
4 I was on my computer. And then shortly thereafter he
5 was charged, but I don't remember if I checked before
6 that or I checked when the time came.

7 I'm not much of a porn guy. I just don't -- it
8 is not a part of my life, never has been, and stuff that
9 she does is particularly gross. So it took some doing
10 for me -- I mean, it was -- there is some really nasty
11 things. So I had to go identify her and find out who
12 she was just so I can say that I had never met her.
13 There was no question about whether or not I had had any
14 sexual interaction with her. I just didn't know if I
15 had met her before.

16 It was not wholly impossible that we would have
17 been somewhere, and she would have been at the barstool
18 next to me or something like that or at the bar or table
19 next to us because again, Joel would oftentimes travel
20 in these -- I used to call them entourages, but he used
21 to describe them as people who he knew from his radio
22 show. And I said, don't -- the radio show was only on
23 for a few weeks.

24 And at the time, I didn't know that his parents
25 had paid for him to buy the block of time. When I first

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1 met Joel, he kind of made it seem like he was a
2 successful radio guy and had gone into the billboard
3 business and did some deal where he was going to get --
4 I'm going to get this wrong, but this is the gist of the
5 way Joel would do it.

6 Let's say you have a radio show slot and it
7 costs this money dollars, costs \$200 for a 30-second
8 slot. Then there's a billboard thing, and they change
9 every ten seconds, and that would cost say \$3,000 a
10 month. You'd have \$2,000 a month on the radio show.
11 Somehow he would get more money from doing both of them,
12 and make more money for the billboard. He had this
13 whole thing.

14 He would describe it as if his radio show was
15 this very large thing. That's where he met Abby. You
16 know, she became a sugar baby of his after he was on the
17 show. I think Joel was sick that day; but, you know,
18 I'm just telling you, there was a huge swath of people
19 that would travel with him. It was CK and everybody
20 else. So when I first heard about this, I'm like, I
21 don't know if I know this girl or not. So my first
22 mission at that point in time was to see like do you
23 know her? If I had met her before, that's a different
24 fact pattern for me.

25 Q. Your paragraph 441 says, Dorworth met -- did

1 meet "KM" in her capacity as Joe Ellicott's girlfriend.

2 A. Yes.

3 Q. Do you know when that -- what timeframe that?

4 A. No. I think it would have been -- well, it was
5 before August 1st because that's when it got dumped.

6 And so I can state affirmatively, but I believe that was
7 at a bar. I believe that was at Liam Fitzpatrick's.

8 Q. That you met K [REDACTED] M [REDACTED]?

9 A. Yes.

10 Q. Okay. You believe you met K [REDACTED] M [REDACTED] in
11 the capacity of Joe Ellicott's girlfriend at Liam
12 Fitzpatrick's?

13 A. I'm not sure about the Liam Fitzpatrick's, but
14 I'm pretty damn sure about that. I know I met her -- I
15 know I met her at a bar, and I know that Joe was hot to
16 trot and very excited thinking he found the love of his
17 life.

18 Q. And that would have been before August of 2017?

19 A. Yes. I don't know if it was before this party.
20 I don't know if it was before -- I don't know, June,
21 July, I don't know. I don't think they were together
22 for terribly long based on what I read there; but, I
23 mean, she denies that they were together at all, and he
24 was basically shopping for wedding rings and trying to
25 figure out which way to do it.

1 So I think that there -- I was there at the
2 time, and I know that Joe was very serious about it, but
3 I think she was saying as much but then she got busted
4 cheating and -- or doing whatever she was doing. I
5 think at that point time, it was kind of just wash your
6 hands of it. But then after that, Joe went and became
7 good friends with her and like moved her to Colorado
8 according to her testimony. So I don't know. It's a
9 different kind of world from anything I'm used to.

10 Q. Paragraph 442 says, On a couple occasions,
11 Mr. Ellicott asked if K[REDACTED] M[REDACTED]'s roommate was
12 welcome to join at social gatherings.

13 Do you see that?

14 A. Yeah. I mean, that's the reason I remember
15 thinking it was the roommate thing. I don't -- again,
16 it was things -- and that's why I asked the question if
17 I ever met her before. It was always, Hey, can we join
18 this or that and can she bring some friends. And to be
19 clear, I mean, I don't -- this is identified as
20 girlfriend's roommate. At the time, it was just
21 K[REDACTED]'s friends. It was no "AB," there was no "AB,"
22 and K[REDACTED] had other friends. It wasn't just "A."
23 There was a whole series of these people that would be
24 there. So again, what I don't know, it turns out she
25 wasn't the roommate either. There is a lot of things

1 there.

2 Q. But you said in paragraph 443, Dorworth agreed
3 and said it would be fine --

4 MR. ANDRADE: Object to form.

5 BY MR. PERKINS:

6 Q. -- not knowing a single defining characteristic
7 of "AB."

8 A. All I will tell you is this --

9 MR. ANDRADE: Object to form.

10 THE WITNESS: Sorry. All I will tell you is
11 that I try to be very accommodating to my friends
12 and clients. If my friend asks if somebody can
13 join, I probably said yes. I just don't think I
14 ever met her. I was not at the party that night. I
15 was not at a hotel room. It's the two times she
16 claims to have been around me, and I believe both
17 are factually completely not true.

18 The point is Joe was always -- he was very much
19 in love with K[REDACTED], and he was trying to bring --
20 and I didn't hang out with Joel all that much, but
21 it was like he sort of thought we were kind of an
22 interesting group of people. He sort of wanted, you
23 know, hang out with K[REDACTED] and her friends. I
24 remember him saying she had friends. I don't
25 remember ever meeting them. And again, that's why I

1 had to go identify who it was because I did meet
2 people like [REDACTED] [REDACTED]. Part of the Joel,
3 Abby entourage. I did meet those folks, just never
4 "AB."

5 BY MR. PERKINS:

6 Q. Your testimony is you've never had a Seeking
7 Arrangements account?

8 A. I have never had a Seeking Arrangements
9 account.

10 Q. Did you have an understanding it was a sugar
11 daddy/sugar baby relationship type dating app?

12 A. With --

13 Q. Seeking Arrangements.

14 A. Yeah. I mean, it's -- culturally I'm aware
15 that there was something. There is an article in the
16 Orlando Sentinel about how UCF was like one of the
17 biggest in the country. But, I mean, to me, the idea of
18 meeting people online and then somehow establishing a
19 relationship where I give you money and we have this
20 sort of pseudo-prostitutional relationship did not sound
21 at all like anything that I would ever want to have to
22 do with.

23 And honestly, Joel for years -- for years, like
24 to be very clear, for all of this June -- for all of
25 this calendar year, Joel was steadfast in his statement

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1 these people, these women, these folks that are around,
2 they all came from my radio show. He was -- he and Joe
3 were kind of celebrities in that regard, and that's
4 where it came from. Because I asked him, I was like,
5 Dude, I know a lot of people. I don't know people that
6 roll around with packs of this stuff.

7 He's like, No, it's all the radio show. It's
8 all kind of part of what we were. And I didn't know
9 Joel before and so I -- it struck me as weird because I
10 had never heard of his radio show, and I don't really
11 think of the people that have done radio as having
12 entourages. It is not really something typical; but,
13 you know, again, by this point in time, I was aware of
14 the fact that Joel had parents that were giving him
15 100,000 bucks a quarter and that he was blowing it on
16 partying. And does it shock me that a bunch of people
17 want to hang out with a guy who's known to buy bar tabs,
18 no, it doesn't.

19 Q. Have you ever used somebody else's account on
20 Seeking Arrangements?

21 A. No, I have never been on Seeking Arrangements.

22 Q. Was there a point in time that you became aware
23 that Joel Greenberg was meeting these women on Seeking
24 Arrangements?

25 A. Yes.

1 Q. Okay. When was that point in time?

2 A. Probably about 2018 or '19, later.

3 Q. How did you become aware of that?

4 A. Somebody told me. I don't remember who, but I
5 asked him. I said, Joel, are these girls -- are they...
6 And he said, Some of them, and he didn't basically own
7 all of them. He said -- what his statement to me was
8 that he met one or two off of that, of the website. One
9 or two is my word. He met a smaller number off the
10 website, and then had sort of met their friends and
11 bought them into the fold.

12 The way -- for the sake of just to illustrate
13 how that would go, I think "AB"'s testimony was that he
14 met "AB" on Seeking Arrangements, and then "AB" brought
15 K [REDACTED] M [REDACTED] around to meet Joe. They had sex, and
16 all the sudden they were dating. I think it was more
17 like he met a small number -- I don't have a precise
18 number, but I was made to believe that all of these that
19 all these women are not from the website. A small
20 number are, and I've met a lot of people from that. If
21 that's true or not, that would be a great question for
22 Joel's deposition.

23 Q. And you became aware of the Seeking
24 Arrangements connection in 2018, 2019?

25 A. I think it was 2019; but, again, to be clear,

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1 the way that it was explained to me, was not that it was
2 anything prostititional. It was more on -- basically
3 these girls want to hang. They think it's cool. And
4 I'm like, Joel, you're a married guy with a couple kids.
5 Why do a bunch of college girls want to hang out with
6 you?

7 Well, you know, we -- you know, we make sure
8 it's worth their time. I'm like, What does that mean?
9 And I didn't press him for details, but, I mean, I just
10 got the impression that Joel was taking his trust fund
11 and blowing the trust fund on women and that Abby knew
12 about it. And it was not a particular secret.

13 Again, the first time -- I think literally the
14 first time I ever said hello with him, I was like, Hey,
15 how's it going? How was the drive in? How is the
16 weather? By the way, I'm in an open marriage. I mean,
17 he was very off the top with that, and it was not a
18 source of any stress. And again, I'm -- it's kind of
19 funny to me at the time because he was -- his wife was
20 pregnant with a kid, and he had just been married for
21 like six or seven months. It was some person that had
22 been in a long marriage. It was like they got into it,
23 and they were in that boat.

24 Q. You're aware that Joel Greenberg met "AB" on
25 Seeking Arrangements?

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1 A. That's what I read in the interrogatories.

2 Q. And that's what you heard in the testimony as
3 well, correct, from Ms. "B"?

4 A. Yes.

5 Q. And you're aware that somebody reported Ms. "B"
6 for being underage on Seeking Arrangements?

7 A. I have been made aware of that through this
8 court case.

9 (Exhibit 118 was marked for identification.)

10 BY MR. PERKINS:

11 Q. Okay. And the next exhibit is 118 which is a
12 picture of Mr. Ralph Anthony Arruzza.

13 Do you know this individual?

14 A. Never seen him, no.

15 Q. Did you have an understanding that some of the
16 women that were at your home on July 15, 2017, were paid
17 to be there? Did that come to your attention at some
18 point in time?

19 A. It's still not come to my attention. I think
20 when the asked the girls, they couldn't even say whether
21 they were paid or not as I recall in the testimony.
22 Again, none of it really made sense to me. It's like
23 where did they come from? Why are these two women
24 coming -- I don't -- you know, it would be one thing if
25 the scenario of the gate log, that when I look at the

1 gate log -- and again, this is just me imputing things.
2 I mean, I can imagine Joe, maybe he was working and said
3 go meet me there. I'll pick you up or something like
4 that. I have no idea why these two people would be
5 there and if it was -- I just don't know. And Mike
6 Fischer doesn't remember them being there either.

7 So as far as I'm concerned -- I don't know how
8 long they were there. I have no evidence that they were
9 there for any period of time of course because I was not
10 there. But the fact that you came into my guard gate
11 at -- let's check this thing one more time. The fact
12 that you came in the guard gate at 6 -- whatever time it
13 was.

14 Q. "B" was there at 6:15, and M^{REDACTED} was there at
15 8:50 --

16 A. I don't know if they were there. I mean,
17 again, I'm sure you have your means of going and pulling
18 cell phone stuff. I just don't know that they were
19 there for more than ten minutes. I don't know, maybe
20 K^{REDACTED} got there and left. So I'm not going to
21 speculate on any of that because I don't know. The fact
22 is, I mean -- and the context of would you have let
23 Joe -- if Joe Ellicott had said, Hey, my girlfriend
24 wants to bring your roommate over. Is it cool? I said,
25 Hey, I'm not going to be there but sounds good. That is

1 probably the conversation I had. I don't remember that
2 going that way at all, but I just remember very
3 seriously understanding that Joe was in deep love with
4 this K[REDACTED] woman, and he was ready to go. He was like
5 reedy to make the move. He saw his unborn children in
6 her eyes, white picket fences, and the dream.

7 Q. You sat through the deposition of K[REDACTED]
8 M[REDACTED], correct?

9 A. I did.

10 Q. And when I asked her about when she first got
11 to the house and she said she was given a tour by Matt
12 Gaetz and they went upstairs and looked at a room that
13 had a tanning bed in it and then had sex.

14 Do you recall that?

15 A. I do.

16 Q. Okay. Back in the summer of 2017, you did, in
17 fact, have a tanning bed on the second floor, correct?

18 A. It wasn't plugged in. Someone paid me --
19 someone owed me money. And instead of paying me, they
20 gave me a tanning bed because you can tell by my
21 complexion I'm not much to tan. So we never plugged it
22 in. It required a fancy electrician plug, and I winded
23 up giving it away.

24 Q. But it did exist in the summer of 2017?

25 A. I think so.

1 Q. Are you contesting that K[REDACTED] M[REDACTED] was at
2 your house?

3 A. No.

4 Q. You believe she was there?

5 A. K[REDACTED] M[REDACTED] was the girlfriend Joe Ellicott.
6 It is entirely plausible to me if Joe would have said,
7 Hey, you know, I'm going to come by later. Is it cool
8 if she goes to hang at your house if Matt was there, if
9 Matt's not there, whatever the circumstance was. I
10 mean, I probably would not have said no, you can't do
11 that. I treat my friends and their women like family.
12 I'm very warm and welcoming. I don't -- there would
13 have been no part of me that would have said no.

14 Now, I would never have expected that that
15 woman would have come off a website -- or I guess
16 K[REDACTED] didn't off the website, but that she would be
17 traveling with an underaged whatever Judge Presnell
18 called them. Essentially a prostitute, you know, going
19 around having sex for money. That I -- I hate to say
20 this, but if you're using your -- sort of forecasting
21 what bad things can happen, it's kind of tough to
22 imagine that. I don't...

23 (Exhibit 119 was marked for identification.)

24 BY MR. PERKINS:

25 Q. All right. Back to K[REDACTED] M[REDACTED], next

1 exhibit, 119.

2 You have seen this video before, Mr. Dorworth?

3 A. Yes, going through your discovery.

4 Q. When is the first time that you saw that? Was
5 it through my subpoena to Ms. M^{REDACTED}?

6 A. Yes.

7 Q. The government never showed you this?

8 A. No.

9 Q. I'll play you this clip here. That's your
10 house, correct?

11 A. Yes.

12 Q. Are you contesting the authenticity of that
13 video at all?

14 A. No.

15 Q. Do you believe that Ms. M^{REDACTED} was in your home
16 at that time going down from the second story to the
17 first story?

18 A. I mean, it predates AI. And, I mean, again,
19 the context of this is this my friend -- and, again, Joe
20 and I, we became friends. Like he -- when he discovered
21 that Ms. M^{REDACTED} was involved in some less than
22 heartwarming sexual things, he called me to come make
23 sure that -- to seek my advice and counseling. He was
24 basically crying at the table. He was devastated. So,
25 yeah, if he would have said, Hey, is it cool with you if

1 my girlfriend comes and hangs out with him -- and,
2 again, I don't know why -- the things I don't know the
3 answer to because I wasn't there. I don't know where he
4 was until 11:15. I don't know -- I mean, I don't know
5 what the deal is with that.

6 It's kind of a late time, and it wasn't like he
7 worked at a movie theater or something like that where
8 he would get off at that time. I don't know what was
9 going on there. And, again, I don't know. I had a
10 tough time believing that if Eric Foglesong was there
11 Matt Gaetz was there, but Fish said -- maybe Fish -- but
12 then they claimed things happened with Eric Foglesong.
13 So, again, there is just no scenario in the world where
14 I believe that Matt Gaetz and Eric Foglesong were both
15 there doing these things at the same time because they
16 would stay far the hell away from each other.

17 Q. Have you discussed the July 15th gathering with
18 Mr. Foglesong?

19 A. I don't think so.

20 Q. Do you recall in the course of the deposition
21 of K [REDACTED] M [REDACTED] where she was discussing some alone
22 time with you?

23 A. Yeah, I have never --

24 Q. And she said that you flirted?

25 A. Well, first things first, she did her

1 interrogatory where the -- Laura Wolf and Chris, they
2 sent a PI out to talk to her. She gave an accounting
3 for how that went. That was not mentioned anywhere in
4 that document. Then she comes in here, and I don't know
5 if she was just feeling the crowd or whatever, but
6 claimed that I did that. I most certainly would not
7 have grabbed the crotch or anything like that of one of
8 my buddy's and client's girlfriend. It did not happen.
9 It never happened.

10 I have never laid a finger, pinky finger, or
11 anything else anywhere on the body of K [REDACTED] M [REDACTED]
12 ever. There is no -- nothing -- I don't think we ever
13 even shook hands. Maybe a side hug to say hello or
14 goodbye, but there would be -- there was no physical
15 contact with her whatsoever. And if I would have seen
16 somebody doing that to my buddy's girlfriend, I would
17 have thrown that person out of the party. That is not
18 how I roll, and that would never take place. Again,
19 mind you, in his mind this is the future Ms. Joseph
20 Ellicott, just a matter of getting a registry complete
21 and everything else. He did not know that two weeks
22 later he would find --

23 Q. Do you think that was a case of mistaken
24 identity with Ms. M [REDACTED] being confused about you and
25 Mr. Ellicott?

1 A. I think Ms. M^{REDACTED}'s just lying. I think she
2 pointedly lied. I think she lied a lot of that stuff.
3 I think she tried to back up her best friend who says
4 she's been best friends with since she was 14 or 15
5 years old. I think that K^{REDACTED} has more exposure in
6 this than any other person because she admitted to doing
7 all those things. I think she would say and do whatever
8 her best friend asked her to do, and I just think it's a
9 straight up lie. And the fact that her own testimony
10 conflicted with "AB"'s, it just -- these are women who
11 are -- for not noble reasons are trying to write
12 themselves into a history that did not exist.

13 Q. Going back to that October 4, 2021, Mr. Hornsby
14 letter, we talked about this earlier.

15 Do you recall that?

16 A. Yes.

17 Q. On page four of 28, it says, You provided me
18 with a number of text messages between Mr. Dorworth and
19 Joe Ellicott that show Mr. Ellicott texting Mr. Dorworth
20 at 11:14 p.m. on July 15, 2017, asking to be let into
21 the community, and Mr. Dorworth responding he notified
22 the gate house.

23 A. I have never seen this. He says he provided
24 it, but I -- again, my understanding of this phone
25 conversation was that when Richard Hornsby called to

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1 say, Hey, it's been months and we have not heard
2 anything from you guys. Is there anything else? And
3 they said, We've moved on from believing that
4 Mr. Dorworth was involved sexually -- but I'm not trying
5 to paraphrase them. I was not on this phone call.

6 But the gist that Richard gave to me was that
7 they said, Hey, we're not looking at your guy anymore
8 for doing anything inappropriate sexually. Now we have
9 moved on to potential justice by an obstruction. On
10 that phone call -- and, again, Richard, you know, I
11 asked him, I said, Did you see any of this stuff? He
12 said, I didn't see anything of these things. They
13 didn't provide us copies of it. It was him talking to
14 Todd Gee, and Todd Gee warranted a few things to happen.

15 So I have not seen them. I don't know about
16 this. I have no -- all this means to me is the feds
17 said, oh, yeah there was texts between -- and again,
18 very possibly maybe he called me and said, can you let
19 me in? Again, if Joe Ellicott asked me to be let in the
20 neighborhood I would do it. And if he called me up and
21 said, Hey -- if I'm awake, I would have done that.
22 There is no part in my mind that thinks that I wouldn't
23 have done that. I just don't know.

24 Q. Did you, in fact, text with Mr. Ellicott on the
25 evening of --

1 A. That's what I'm telling you. I have no
2 recollection of it.

3 Q. Is it possible?

4 A. Sure. Again, I just told you. It's very, very
5 possible. If I would have gotten a phone call from Joe
6 Ellicott or a text message saying, just trying to go
7 through your gate because you didn't answer the phone, I
8 would have said, give me one second. I'll add you onto
9 the gate. That is how I would have responded to that
10 situation.

11 (Exhibit 120 was marked for identification.)

12 BY MR. PERKINS:

13 Q. Next exhibit will be 120. This is a text
14 message -- or a Snapchat message that we've discussed
15 previously in some depositions including Mike Fischer
16 and K [REDACTED] M [REDACTED]

17 Do you recall that?

18 A. Yep.

19 Q. And that's a picture of Joe Ellicott, correct?

20 A. Correct.

21 Q. At the top. And it appears Mr. Ellicott's
22 saying, I'm going to try to hook Fish up for later right
23 now. Gonna see what I can do.

24 A. I have seen this before. I have never had
25 Snapchat, first of all. I don't see where -- I don't

1 believe I ever had this conversation. I have never paid
2 for any guy to have sex. Not no friend of mine, no
3 friend ever. Mike Fischer makes a nice living. I'm
4 also not -- I don't want to violate the man's privacy,
5 but I think he had like this severe whole hip
6 replacement which at his age and health, I'm not even
7 positive that's on there.

8 At no point in time did I try to have any of
9 these conversations. And the fact that -- I don't even
10 know what that is. It looks like a conversation, but
11 what even says it's from me. It's just him, and that's
12 not even totally clear to me how he did this because I
13 Snapchat the whole thing was that you make it disappear.
14 So I don't know. I don't see anything on there that
15 indicates that I did any -- it just -- and that's July
16 18th.

17 Q. Well, this is July 16th. You see that right
18 there?

19 A. So that one's -- yeah. But again --

20 Q. So the next day --

21 A. My question is this: I have never had
22 Snapchat, but my understanding is the things disappear
23 in a day. How does he have a text four years later?

24 Q. Well, K [REDACTED] M [REDACTED] produced this.

25 A. Right, but, I mean, how? Did she screen

1 capture it.

2 Q. It looks like a screenshot. I think that's
3 what she testified to.

4 A. Again, I believe that K[REDACTED] is not the most
5 honest person in the world, but I'm just telling you
6 right now that there is nothing in that says I ever did
7 this nor would I. Again, if I would have said, Hey,
8 Mike Fischer, let me do this for you, do this kind of
9 thing, it would have been a very uncomfortable, negative
10 energy. That did not happen. That did not happen. And
11 I don't -- listen, it's not clear to me here because it
12 looks to me and I just call BS on it because I know for
13 a fact that you've already seen in the things that I've
14 turned over, Joe believed that she was his girlfriend.
15 Why would he be calling the girl he wanted to marry and
16 say that I was willing to pay 500 bucks to have sex --
17 for her to have sex with Mike Fischer? I just -- the
18 whole thing just defies any sort of --

19 Q. Are you saying that you did not respond to it,
20 I'll cover 100 percent --

21 A. Yes, I did not ever --

22 Q. You're saying that's not your text?

23 A. No. I did not do that.

24 Q. Have you ever offered to pay a woman to have
25 sex with a third party?

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1 A. No.

2 Q. Have you ever offered to pay a woman for sex
3 for yourself?

4 A. No. I've never paid for sex unless you count
5 alimony.

6 Q. Let's talk about the deposition testimony of
7 Ms. "B." You sat through that testimony. Ms. "B"
8 talked about a volcano bong.

9 Do you recall that?

10 A. Yes.

11 Q. Do you have a volcano bong?

12 A. I do. It's not exactly a secret though. I
13 mean, I'm sort of like the -- I mean, I'm big -- you
14 know, I've had it for a long time. I've had it since
15 when I got out of the legislator in 2012 or 2013. So, I
16 mean, when she said I was big into -- that doesn't
17 pencil because that is something I have had for four or
18 five years, and she described it as new. I just thought
19 that people are aware of the fact that -- probably Joel
20 said, he's got a volcano on his back patio, and that's
21 all they needed to try to make that seem like it was
22 anything.

23 Q. So you had that volcano bong in the summer of
24 2017, correct?

25 A. It's not a volcano bong. It's a volcano

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1 vaporizer.

2 Q. Vaporizer?

3 A. The technology behind it is if you burn in a
4 bong, a traditional bong, you would burn the flower, and
5 that would create all of the things that you suck down
6 into your lungs and all of those things. A vaporizer
7 lifts the THC off the leaf, and then the volcano then
8 uses the air flow to blow it into a balloon which makes
9 it much smoother and easier to use. It is pretty widely
10 accepted to be that sort of preeminent means by which
11 somebody can smoke marijuana -- or vape marijuana I
12 guess would be...

13 Q. When I was going through your Wells Fargo Bank
14 records on page 15 of 19, I noticed that there was a
15 purchase there from Apothecary for Marijuana for
16 \$348.68.

17 A. Which one? Where is this one?

18 Q. Let me pull it up here.

19 A. I'm sorry, 348, yeah. Sure.

20 Q. Right. \$348.68, was that for marijuana?

21 A. No. It's for a little -- an apothecary makes
22 these -- they made a little thing. It's called a
23 candor. It has little jars, and it's a device. It's a
24 place where you keep ground up flower and rolling papers
25 and anything else you might want. I don't know how

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1 exactly you would purchase that online.

2 Q. Do you ever have memory loss from the use of
3 marijuana?

4 A. No.

5 Q. What about from the use of alcohol?

6 A. Define memory loss. Do I ever have too much
7 one night and forget, I'm pretty good about that.
8 I'm -- my wife what not call me a -- whatever she called
9 me, however she referred to my drinking skills. I have
10 a good memory. Has it ever happened in my life?
11 College, I imagine, but I don't black out if that's what
12 you're asking.

13 Q. What about fuzzy memories after a night of
14 drinking? Do you ever have that --

15 A. I have a pretty acute memory. As you can see,
16 I don't equivocate on my words. I know what it was, and
17 I'm not saying it's -- I have never had that happen.
18 I'm saying that I cannot sitting here right now think of
19 an example of that that would fit the four corners of
20 what you just described.

21 Q. Would you agree with your wife that you're a
22 world class drinker?

23 A. Those are her words, not mine. I think what
24 she means by that, my wife was raised in a very devout
25 Southern Baptist home. She was thought at alcohol is

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1 just fundamentally evil, and it causes people to do bad
2 things. In her childhood, you weren't not allowed to go
3 over to a friend's house if they had open bottles of
4 alcohol out. So much of when I first met her, she told
5 me, I don't drink much. I said, It's okay, I'm not
6 looking for a drinking buddy.

7 But, you know, she -- so part of what it is
8 obviously, I -- anybody who has ever been married before
9 and in a relationship before knows that oftentimes your
10 wife or your girlfriend might have an opinion on what
11 you're drinking was. With Rebekah it was just always
12 that she noticed that I do not have a change in
13 personality. I don't get violent. I don't get sloppy.
14 I don't get drunk. I don't walk out on my bar tab. I
15 don't get in fist fights. I don't yell at my kids. I
16 don't yell at my wife. I mean, I'm just a very level
17 personality type. I've always been that way. And those
18 people, if I drank -- you know, if I spent all day at a
19 Twin Peaks or a Liam's and had a \$300 bar tab, I doubt
20 you could probably tell. I mean, I don't -- there is
21 very little personality change. There is just very
22 little --

23 Q. Do you ever have hangovers?

24 A. The older you get, the more they come. I --
25 what I have -- when I get a hangover I don't sleep well.

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1 So the answer to your question is I don't get hungover,
2 but if I drink alcohol to excess, the idea that I'm
3 going to get any sort of rim sleep that night is low, so
4 I tend to be tired the next day which dissuades me from
5 drinking as much as I used to.

6 Q. And is your drink of choice bourbon?

7 A. Bourbon and water or vodka.

8 Q. And let me try to play this clip of Ms. "B." I
9 know we had some technical difficulties last time
10 because I think this was on. Right? If I press this,
11 and I'm going to play this clip here where she's
12 describing the interior of your home. Let's see if it
13 works.

14 (A video clip was played.)

15 (Exhibit 121 was marked for identification.)

16 BY MR. PERKINS:

17 Q. All right. Were you able to hear that
18 testimony --

19 A. I was.

20 Q. -- from Ms. "B." And I'll mark for the record
21 as Exhibit 121, and she described your house as she saw
22 it on July 15, 2017.

23 In the summer of 2017 was there a bathroom near
24 the pool?

25 A. There is --

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1 MR. ANDRADE: Object to form.

2 MR. PERKINS: Go ahead.

3 MR. ANDRADE: Yeah. Object to form. I don't
4 believe she testified the date that she was there
5 exactly what she was describing other than the
6 house.

7 THE WITNESS: I don't have a screened glass
8 door at my house. I don't know what she's talking
9 about. That description of my house does not
10 particularly match how it is, no. There is a --
11 there was a gym upstairs. That was established.
12 There is no bedroom in my home other than my room
13 that can see the pool. So you would have to be
14 taller than -- you would have to be taller than me
15 to look over and see out into it because it's just
16 most of them have -- there is like a window that's
17 up high. So I disagree with that characterization
18 of the house.

19 You know, we had two chairs facing each other,
20 a piano. There is a -- there is no sliding glass
21 door, but on the far side of the house there is a
22 door that goes outside but it's not sliding. It's
23 an open and shut door. There is a pool table in the
24 living room and was at that point in time. There is
25 a full bar in that living room, and it is -- I

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1 bought John Morgan, the trial lawyer's, old house.
2 He built the bar. I can assure you because I think
3 it's a ten by ten -- it's a very large bar with
4 dozens of things there. There is a TV in the living
5 room. So, I mean, her characterization of the place
6 is not --

7 BY MR. PERKINS:

8 Q. Was there an air hockey table in 2017?

9 A. There was an air hockey, but it was not in the
10 living room. That was in a side room.

11 Q. And there was a gym upstairs, correct?

12 A. There was a gym, yes.

13 Q. And your testimony is that you could not see
14 the pool from the upstairs bedroom except for the master
15 bedroom?

16 A. Yes. I mean, you could do it. You would have
17 to be very tall. You would have to probably get
18 something to step on to look through a window to go
19 down. When I hear this, I have this overlooks things.
20 There is no view --

21 Q. Could you stand on a bed and see it?

22 A. The beds are never against the wall. So I
23 guess if you shoved the bed over there, you might be
24 able to do that. But the beds in my house were all
25 centered against the wall. There is none up against the

1 wall. There might be one room where there is like --
2 again, you know, I would have to go check it out, but I
3 don't think of any of the rooms in my house as being
4 particularly conducive to looking at the pool. I mean,
5 so I don't really know what she's talking about.

6 Q. Do you think Ms. "B" was in your house on July
7 15, 2017?

8 A. I think she was on the guard gate. I won't go
9 any further than that. Mike Fischer didn't see her
10 there.

11 Q. How would she know there was a gym --

12 MR. ANDRADE: Object to form.

13 THE WITNESS: K[REDACTED] M[REDACTED]. K[REDACTED] M[REDACTED]

14 said that too. For that matter, you know, the
15 volcano, that could be Joel. I mean, these are
16 not -- the woman couldn't tell me what my vocal
17 accent sounded like, if I talked fast, if I talked
18 like a southerner. She couldn't name any of those
19 things. She kind of miss-described my home. She
20 described a sliding glass door that never existed.

21 You know, do I think that she was at the guard
22 gate, she was on the guard gate that day. Do I
23 think if she came in the house? Well, Mike Fischer
24 during his testimony said no. K[REDACTED] M[REDACTED] I
25 believe to be a liar and has lied extensively, and I

1 have had nobody else confirm to me that she was
2 there. So again, I don't know if "AB" was at my
3 house. I know she is on the guard gate.

4 BY MR. PERKINS:

5 Q. And M^{REDACTED} said she was there, Greenberg said
6 she was there, correct? Ms. "B" said she was there --

7 A. I've never heard Joel say that.

8 Q. Well, you've seen his interrogatories --

9 A. Well, I mean, I believe he said that, but I
10 don't think Joel was there. Joel was never on the guard
11 gate. Joel didn't live in the neighborhood at the time.
12 So, I mean, if Joel said she was there, how do you prove
13 Joel was there? Joel lived -- at the time, he lived in
14 a townhome with Abby. His road backed up to Orange
15 avenue in a townhome in the back of the neighborhood.
16 Every time he went through the guard gate he had to
17 throw a driver's license down and everything else. He
18 didn't that day. So I don't know that Joel was there.

19 So I'll disqualify that one as saying I don't
20 know how that you can prove that Joel was there because
21 there is nothing on there. I know that Mike Fischer
22 gave you testimony that he did not see those girls. You
23 asked them every which way you could ask him. Is it
24 possible he was asleep? Could he be somewhere else?
25 Things like that. I don't -- I think Mike Fischer was

1 at my house.

2 And, again, as far as these whether these
3 women, I have not heard from B [REDACTED] G [REDACTED] on that one.
4 But, you know, as far as I'm concerned, the source on it
5 right now is Joel who wasn't even there and K [REDACTED] who,
6 you know, knew that she was underage and was ostensibly
7 going places to watch her have sex or to engage in that
8 which is the very pure definition of human trafficking.
9 So between a human trafficker, a convicted human
10 trafficker, and Joel, those are the only people that are
11 saying she was at my house that day. Other than the
12 guard gate who said that she went through the gate.

13 Q. A guard gate that shows a tag that is
14 affiliated with her mother's vehicle, right?

15 A. It's her name. It's her driver's license.
16 They don't take your word on it. I have had
17 circumstances with a friend of mine, Scott Plakon, who
18 was a State rep. He drove over to my house, he got an
19 RV, he wrapped the entire damn thing in his face. Scott
20 Plakon for Florida House. Big picture of Scott's face
21 ten feet wide. And he pulls up to the guard gate and he
22 was driving his RV so he didn't bring his driver's
23 license. They made me drive -- they made me go up
24 there, jump in the car, and drive him through the gate.
25 These are -- they are -- the Heathrow -- they are very

1 serious about their job.

2 So, yeah, I mean, she went through the guard
3 gate. They do not show you a picture of her driver's
4 license. Are you aware that this person is going in
5 here which I think you asked questions about that. Like
6 did they show the real driver's license? I have a high
7 level of confidence that "AB" went through the guard
8 gate. You asked me if she was at my house, how long she
9 was at my house, do I think she did anything at my
10 house? I have a picture of K[REDACTED] M[REDACTED] at the house,
11 but I don't have an issue with K[REDACTED] being at the
12 house because K[REDACTED] was dating Joe Ellicott who came
13 over later that day.

14 And, again, I don't know the circumstance, but
15 my guess is probably Joe had something going on. He
16 said, is it cool if she goes over there and hangs out
17 until I get back? That would make sense. Nothing else
18 makes sense. And whether or not "AB," I do not know, I
19 would not be okay with that. If I would have seen the
20 woman who was reflected on that screen, if she would
21 have been at my house, I would have seen her and said,
22 Hey, listen, I don't mean to be rude here, but if you're
23 going to drink, can I see some ID?

24 I did not do that. I did not see her. I never
25 met her. I don't know why she was there, and who got

1 her there. Makes sense under one scenario, and that is
2 that Joe Ellicott who stated and as you can read in
3 those -- the proffers, I mean, like he thought she was
4 his girlfriend. So I don't have any objection, I have
5 no guilt, no reservation, no hesitation about saying
6 that K [REDACTED] M [REDACTED] can be at my house. It's very
7 possible because she was --

8 Q. Why would you have asked for Ms. "B's" --

9 A. Because she looked like she was young. The way
10 they describe this woman, at the time she used to have
11 braces and everything. If there had been a woman at my
12 house trying to drink or -- like who had braces on.
13 Trust me, I've been in elected office. I know how this
14 thing can go. I would not have been okay with that. I
15 would have been very proactive in combatting that.

16 Q. Did you hear Ms. "B"'s testimony that you
17 observed her dancing naked?

18 A. It's all 100 percent guaranteed lie. I didn't
19 meet her. She said I was here. You know there is
20 metadata to the contrary. I mean, all those things that
21 she said happened, it's just all lies. She's making
22 this stuff up; and, again, I get it -- under the theory,
23 under the notion that maybe it's somebody else, well,
24 was Joe there? Did he come back later? How'd that go
25 down? I don't really understand. I wasn't there. I

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1 can't -- it would be speculating. I mean, I'd be trying
2 to come up with stuff that is -- it would just be me
3 trying to figure out how to fit all the pegs in a hole.
4 The reality is that I would not have been okay with a
5 person young -- that young looking who had braces going
6 around my house drinking or anything else. If nothing
7 else, from an insurance point of view.

8 If something like that happens and something
9 happens to her, then we could be sued, and that would
10 not be a good lawsuit to have. So, I mean, that would
11 have been very unsettling to me if I had seen someone
12 who -- again, she doesn't have braces anymore, but
13 through some of her film work, she had -- I don't know
14 when she got the braces. I don't know if she had braces
15 back then. I have no clue.

16 Q. And you heard her testimony that she said that
17 you observed her and Matt Gaetz having sex on the air
18 hockey table?

19 MR. ANDRADE: Object to form.

20 THE WITNESS: It's a total absolute lie. At no
21 point in time did that happen. First of all, if
22 that did happen -- for that to happen, I would have
23 to have had to walk into a back room and known they
24 were back there. And then according to her, I made
25 some jokes about it when I didn't do any of that.

1 It's nonsense. It's just her lying her way into a
2 story to try to make it seem like something happened
3 but it's just not true. I never saw -- I have never
4 seen Matt Gaetz have sex with "AB" or anybody else.
5 So you can -- you can -- of that we can be very
6 comprehensive with our answer there.

7 (Exhibit 122 was marked for identification.)

8 BY MR. PERKINS:

9 Q. All right. Next exhibit is some photographs of
10 some females that I have been showing to these
11 witnesses, Exhibit 122.

12 And we talked about that July 22nd party at
13 your house?

14 A. Yes.

15 Q. Do you recall that?

16 A. Yes.

17 Q. And K [REDACTED] I [REDACTED] is at page 11.

18 Do you recognize K [REDACTED]?

19 A. Honestly, that's not what I thought K [REDACTED] I [REDACTED]
20 looked like; but, yeah, she looks familiar. I think I
21 have met that person before.

22 Q. And it's your understanding she took Brady
23 Benford's phone at that party?

24 A. That is my understanding thinking it was Joel
25 Greenberg's.

1 Q. And there was also discussion about I [REDACTED]
2 P [REDACTED].

3 Do you see that blonde, page 13 of 20 of this
4 exhibit?

5 A. She looks like somebody I went to college with
6 at the University of Florida with, but I don't think I
7 know her in this context.

8 Q. Was she ever at your house in the summer of
9 2017?

10 A. That would be news to me. You described a --
11 was that in 2017 that she got in a fight with K [REDACTED]
12 I [REDACTED]?

13 Q. July 22, 2017, there was a fight between a
14 brunette and a blonde, K [REDACTED] I [REDACTED] and I [REDACTED] P [REDACTED],
15 and they knocked over a vase and Brady Benford's phone
16 was taken.

17 A. It sounds like quite a night. I have no
18 recollection of a broken vase. Certainly wouldn't have
19 been an expensive vase or anything. It might have been
20 something from like -- but I don't remember that, and I
21 don't know that person. I don't know I [REDACTED]. I mean, I
22 might have met her at some point. She might have been
23 somebody who was around, but I don't have -- let me put
24 it this way, I cannot tell you a defining
25 characteristic. I could not say, like, I know where she

1 is from. Her face does look familiar, but that might be
2 from a University of Florida thing. I don't know.

3 Q. Do you know who invited K [REDACTED] L [REDACTED] to your
4 house?

5 A. No. That would have been on the 22nd, right?

6 Q. Yep.

7 A. Well, nobody on that list makes a ton of sense.
8 I don't know.

9 Q. You've got Frank Artiles, Jason Brodeur.

10 A. She was part of the people who Joel would
11 detail as being his friends from the radio show. Most
12 of these people were that. Because, you know, when you
13 meet somebody new and they're married and they have got
14 young kids and they're hanging out with all these
15 people, you're like who are they? What's going on here?
16 Are these family members? Friends? Are you guys in
17 some toastmasters? What's going on? Where are these
18 people coming from? And his answer was always, Oh, no,
19 these are people who worked on my radio show. And then
20 he gave them all jobs at the tax collector's office. So
21 they were sort of introduced in the greater context of
22 that.

23 (Exhibit 123 was marked for identification.)

24 BY MR. PERKINS:

25 Q. Moving onto the next exhibit will be 123.

1 These are Lyft records that we were able to subpoena,
2 and there is a reference there to K [REDACTED] I [REDACTED].

3 Do you see that?

4 A. Yes.

5 Q. And it was on the morning of July 23rd.

6 Do you see that?

7 A. Sure.

8 Q. And it says 1545 Whitstable Court.

9 Do you see that?

10 A. That is not my address.

11 Q. Do you recognize that address as being a
12 neighbor?

13 A. Yes.

14 Q. And who is that neighbor?

15 A. I don't know.

16 Q. Do you know their names?

17 A. I don't know which house that is. I don't know
18 if that's the one next door to me or across the -- I'm
19 1520, so how do you get to 1545? I guess it would be
20 probably on the other side of the street because I think
21 one is even, and one is odd. So I'm going to guess it's
22 either one of the other houses on the other side of the
23 street. Sort of peculiar because you wouldn't -- if you
24 went to 1545 Whitstable Court, you wouldn't be able to
25 get in the gate.

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1 So let's say the Uber gets there and they're
2 picking somebody up, they'd say, Hey, I'm going to 1520
3 Whitstable Court, and that would be for Dorworth. And
4 then it's not clear to me -- again, I'm not an expert on
5 this, but I don't know how all these people kept going
6 to 1545. If they did that, they wouldn't be able to go
7 into the neighborhood. So it's kind of weird.

8 Q. Yeah. We issued a subpoena to Lyft for a
9 quarter mile radius of your house, and this is what we
10 got in response. But it looks like the requested
11 address for pickup was 1545 Whitstable Court.

12 A. Again, I don't -- that's the part -- but,
13 again, if they would have done that, they -- I have no
14 idea of how this works or how the internal GPS systems
15 for these things work, but it would just strike me as
16 odd because getting to 1520 Whitstable -- maybe not. I
17 guess if these people are in the car picking them up,
18 the ride says finished, so they're being dropped off.
19 Maybe they said, Hey, just drop me right here, I guess.
20 But, I mean, they would have all requested 1520. So
21 that doesn't make a lot of sense. Again, just -- I
22 wouldn't -- nobody would have access to the 1545 thing
23 to let people in or not. And if Jason Perkins is coming
24 over and he's going to 1545 and I call 1520, that's not
25 going to connect. But, I mean, Frank Artiles. I don't

1 know what Owner Foglesong. I know Eric Foglesong, and,
2 again...

3 Q. M^{REDACTED} Z^{REDACTED}, she appears on that log on July
4 22, 2017. You know Ms. Z^{REDACTED}, correct?

5 A. I do.

6 Q. How do you know Ms. Z^{REDACTED}?

7 A. We've become -- over the years, she dated Matt
8 for awhile, and she -- you know, she's -- she can wind
9 up -- like when Matt made his -- Matt, they made a movie
10 about Matt. It was like him and two other people, like
11 Drain the Swamp or something like that, some deal along
12 those lines, and she -- I think she and her fiance came
13 over. I mean, they've been -- like Matt dated her for
14 awhile on and off, and then she got a boyfriend for
15 awhile and came back but now she's a with guy, and I
16 think they're either married or had a kid. We bumped
17 into them at an ice cream shop a couple years ago.

18 Q. When is the last time you had contact with
19 Ms. Z^{REDACTED}?

20 A. It was at the ice cream shop. It was like,
21 Hey, how's it going? I think she was pregnant at the
22 time. We really didn't talk about anything, if that's
23 what you're asking.

24 Q. Was she at your house on July 22, 2017?

25 A. Again, that was the night -- I never saw her

1 there. I never met her that night.

2 Q. You think you had retired for the evening?

3 A. Yeah. But she got there very late. I think I
4 woke up at something like 2:00 or 3:00 in the morning,
5 whenever K [REDACTED] I [REDACTED] was leaving.

6 Q. Because there was a bunch of ruckus associated
7 with K [REDACTED]?

8 A. Well, I believe that the thing that actually
9 got me up was Brady who was pissed off that somebody had
10 stole his phone thinking it was Joel's phone. I don't
11 ever recall having any sort of conversations. I think I
12 met K [REDACTED] like, Nice to meet you. She was introduced as
13 being part of something they were -- like something they
14 worked on together as friends. And later we would find
15 out that she was deeply in love with Joel. So that
16 was --

17 Q. K [REDACTED] I [REDACTED]?

18 A. Yeah.

19 Q. Have you ever seen M [REDACTED] Z [REDACTED] naked?

20 A. No.

21 Q. Have you ever seen her topless?

22 A. No.

23 Q. Have you ever seen her do any drugs?

24 A. No.

25 Q. Do you have any reason to believe that Matt

1 Gaetz had sex with M [REDACTED] Z [REDACTED]?

2 A. They dated. I would not be -- I don't have
3 direct knowledge of that, but I believe they were --
4 like they would -- they were -- they were dating.

5 Q. Have you ever had any type of sexual relations
6 with Ms. Z [REDACTED]?

7 A. No.

8 (Exhibit 124 was marked for identification.)

9 BY MR. PERKINS:

10 Q. All right. The next exhibit here will be 124.
11 This is an April 3, 2020, text string between you and
12 Mr. Greenberg.

13 Do you see that?

14 A. I do.

15 Q. All right. And it looks like Mr. Greenberg
16 texts some Pornhub address there?

17 A. That's what it looks like to me.

18 Q. Is it ses, [REDACTED] was destined for greatness; and
19 you respond, LOL; is that right?

20 A. Yes. I don't think I ever even clicked on the
21 link, by the way. I think he just sent it.

22 Q. Why did you respond LOL?

23 A. That's about the most benign response you can
24 have. Joel would send a lot of weird things. I mean,
25 he, as a person, would sort of inundate you and just

1 find things -- the best way to deal with him was not to
2 try to like, Joel. You just sort of move on because if
3 he thought he was getting any sort of response, he'd
4 sort of -- he'd keep texting. So, I mean, I think that
5 was probably my way of just saying I have no interest of
6 talking about this, Joel. Let's move onto other things.
7 As you could see, I said, LOL, and five hours and 53 --
8 five minutes later, moved onto other stuff about
9 politics.

10 Q. Why didn't you respond, Who's [REDACTED]?

11 A. Because I don't care who [REDACTED] is. I didn't
12 know who she was. He posted her up there. I didn't
13 know if that was for my benefit or Matt's. When
14 somebody posts a link to a porn star and says, I knew
15 they'd be a star or whatever, whatever the thing was, I
16 mean, that's an LOL.

17 Q. Is it your testimony that at the time this text
18 was sent by Mr. Greenberg on April 3, 2020, you did not
19 know who [REDACTED] was?

20 A. No. No. I mean, by April 3, 2020, I became
21 aware of the fact that -- I just didn't know it was --
22 there was an "AB". I knew her as V[REDACTED] 99, but I
23 knew -- for example, I told you the story about how
24 Halsey Beshears had gone to the Bahamas and got stopped
25 on the way back. I knew it was K[REDACTED] -- K[REDACTED]

1 M[REDACTED]'s -- I thought was roommate. But, you know, I
2 thought it to be the same person. I could not have told
3 you her name was "AB." I could not have told your her
4 name was "A." I could not have told you her last name
5 "B." I couldn't tell you her nickname was [REDACTED]. I sure
6 as hell couldn't have told you what her thing was, the
7 v[REDACTED] 99 thing that he tried to text me when he was
8 trying to get us all lawyered up because he had started
9 doing that stuff. Again, I --

10 Q. So you knew this person existed in April of
11 2020?

12 A. I probably couldn't have spotted her out of a
13 lineup, never had any dealings with her, but I knew that
14 R[REDACTED] M[REDACTED] had a roommate, and I think -- I was at
15 least aware of the story about when they went to the
16 Bahamas.

17 Q. And did you know that she was a minor in the
18 summer of 2017?

19 A. I don't think so. I don't know how I would
20 know that, no.

21 (Exhibit 125 was marked for identification.)

22 BY MR. PERKINS:

23 Q. Next exhibit, 125. This is the link that was
24 connected to that text message, [REDACTED] destined for
25 greatness, and you see R[REDACTED] R[REDACTED] there?

1 A. Yes.

2 Q. And that is "AB," correct?

3 A. That looks like the one -- like I said, she had
4 a cardigan on when she was here, but same general
5 aesthetic.

6 Q. And have you investigated R[REDACTED] R[REDACTED]?

7 A. Yes.

8 Q. And what did your investigation entail?

9 A. Well, with my previous counsel, he didn't -- he
10 was not comfortable with looking at this stuff. So he
11 said, Do me a favor, just run through the videos -- and
12 the other one he worked with was a female and didn't
13 feel comfortable with that. So he asked me if I
14 wouldn't mind going through the videos -- mind going
15 through the videos just to see what was in there.

16 Q. When Greenberg sent you the link, its your
17 testimony you didn't click on that?

18 A. I don't think so, no.

19 MR. ANDRADE: Just really quick, about how much
20 more time do we have? What record time are we at
21 right now?

22 THE VIDEOGRAPHER: A little over 58 minutes
23 since we have gone back on the record.

24 MR. ANDRADE: So like 15 more minutes?

25 MR. PERKINS: We can stop at 5:20. Does that

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1 work?

2 BY MR. PERKINS:

3 Q. Okay. So when Greenberg sent you the link,
4 it's your testimony you don't recall clicking on it?

5 A. Again, as a general policy I do not click on
6 porn links. Again, I don't -- one, I have an
7 understanding again -- remember, I used to work for
8 Ballard Partners, and the -- we were very keen on the
9 fact that we would represent nations and were a frequent
10 victim of cyber hacking.

11 And one of the key lessons of that was that you
12 would not want to click on anything that was a porn link
13 because those things basically all had nasty, little
14 tentacles and the things you do not want to have. The
15 best case scenario is you would have what I think they
16 call a cookie or something like that that would be a
17 tracking thing on there. So I, as a general rule,
18 just -- you know, if someone sends me a link from
19 Pornhub, I don't open it.

20 Q. In August after Joel was indicted for
21 activities with these women, is that the first time that
22 you went online and searched for --

23 A. The first time I actually -- I found her
24 before, but I had never watched the videos. It wasn't
25 until Michael Beltran asked me to do it that I did that.

1 Q. Okay. So you found her in August of 2020?

2 A. Yes.

3 Q. And you got her stage name, R[REDACTED] R[REDACTED], in
4 August of 2020?

5 A. Well, I mean, apparently Joel had given me all
6 this stuff to the point is I -- that text message was a
7 total nonfactor in my day. You just read, LOL, move
8 right on. This is just Joel doing what he does. I
9 would have paid no attention to -- I would have not had
10 any reason to care about her. I would not have known --
11 there would not be one part of me that though, Oh, wow,
12 this is the one who -- I mean, I didn't know that Joel
13 had sex with anyone who was underage. I didn't know
14 that Joe had sex with her when she was underage.

15 I didn't know any of that stuff. But, you
16 know, when I watched it, I just went on there and just
17 found some truly disturbing stuff. I mean, it was not
18 like Cinemax, like some light point. It's really
19 graphic, horrible things. And I'm not a porn guy, but
20 my understanding from the research I did there with that
21 stuff is that she does the stuff that's like wet work,
22 and then she will frequently do things that are just
23 utterly repulsive. Like she will put milk in her butt,
24 and then have an enema on top of cereal and take a video
25 of it.

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1 And I was -- remember reading it, and I would
2 see these people saying -- in the comments on her social
3 media saying, You go, girl. You know, Earn -- it was
4 just a very unsettling, very unpleasant thing. You
5 know, I mean, she -- it was just -- this human being --
6 you know, like I said, it's not some sin-a-max after
7 dark kind of thing. It is a -- it is very gratuitous,
8 hard core pornography.

9 (Exhibit 126 was marked for identification.)

10 BY MR. PERKINS:

11 Q. All right. The next exhibit will be Abby
12 Greenberg's answer to interrogatories, Exhibit 126.

13 You see those up on the screen?

14 A. I do.

15 Q. I'm going to ask you a couple questions here.
16 There is a discussion here on June 4, 2020, do you see
17 that, about Abby Greenberg having a girls night dinner
18 at the Vineyards at Lake Mary. Came over to Liam
19 Fitzpatrick's with Anne Pham.

20 A. Yeah.

21 Q. And it was Anne Pham and Ms. Greenberg, and
22 they ran into you at Liam's and then you talk about a
23 party and took them home.

24 Do you recall that?

25 A. I remember taking them home -- I remember I

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1 drove the two of them home. I don't remember going to
2 any party.

3 Q. Do you remember dropping off Anne Pham?

4 A. I do, and then Abby just like ten seconds
5 later. They lived on the same street.

6 Q. Did you take Abby back to your house first?

7 A. Yeah, I read this. I don't know what she's
8 talking about. There was no party at my house. There
9 would be no party at my house. I don't -- it doesn't
10 really -- I almost -- I don't know what this is about.
11 I never had any kind interaction like that with Abby.

12 Q. Okay. It's your testimony that you did not
13 take Abby Greenberg to your house at 1520 --

14 A. No.

15 Q. -- on June 4, 2020?

16 A. I don't remember June 4, 2020. I don't know
17 what day that was. There was one day that I ran into
18 Abby and Anne Pham, and they were with like ten other
19 people. And the other girls -- I don't remember what
20 the circumstance was; but for some reason Abby and Anne
21 were done for the day, and I think the other ones were
22 maybe going out. Whatever it was, they asked me if they
23 could get a ride home. I said sure. And I just -- I
24 said there was a party at my house, we went back there
25 and Abby requested -- I don't -- it doesn't really...

1 Q. But your testimony is you dropped them both off
2 at their individual residences?

3 A. Yes. Was that June 4, 2020?

4 Q. Correct.

5 A. So that would have been like the week before
6 Joel got indicted.

7 (Exhibit 127 was marked for identification.)

8 BY MR. PERKINS:

9 Q. All right. The next exhibit, these were some
10 texts that were discussed in the deposition of
11 Ms. Dorworth.

12 Do you recall that?

13 A. I do.

14 Q. And I wanted to ask you about page seven of
15 eight of this text string.

16 A. This is where you guys forgot to put the matzo
17 ball -- omitted the slide. I remember that. It was
18 very dramatic.

19 Q. And specifically I wanted to talk about this
20 reference to J^{REDACT} an I^{REDACTED}.

21 A. I want to go back on this thing because I
22 remember reading this when the time came. It is very
23 clear that I want to go out and hang out with my friends
24 at FishBones. I even say to Joel, my wife is out of
25 town, I don't want to -- I don't want to... And so he

1 keeps trying to talk about this when I have no idea --
2 like who? I don't know who they are. I have never met
3 them. I don't if it's J^{REDACT} and it's that I^{REDACTED} that
4 you -- I don't know who that is. Nobody is on my guard
5 gate, and I was -- I got back at 11:30. I was with a
6 sitting circuit court judge. There were no girls there,
7 none of that stuff. So I don't even know what this is
8 trying to intimate. If you read the entire thing, it is
9 me being like, what are you talking about? The girls.
10 I have no idea what he's talking about. I went out, I
11 was driven by a judge, hung out with a judge, got driven
12 home by a judge. There was no -- none of this stuff
13 happening that day.

14 Q. Okay. And so -- I just want to be clear, we're
15 on page seven of 18 of Exhibit 127. Mr. Greenberg says,
16 Five minutes until they're here. Go get the girls from
17 the front. You respond, What girls? Mr. Greenberg
18 responds, J^{REDACT} and I^{REDACTED}.

19 A. You need to understand that Joel would send
20 weird stuff all the time. When you write LOL and things
21 like that, I had -- like if you go back and read the
22 entire chain which you made Rebekah do except for that
23 one page that had the stuff about the matzo balls. I
24 mean, like if you read the entire thing, Hey, we're do
25 doing this, I don't know what he -- I don't know if J^{REDACT}

1 and I [REDACTED] are here. Although, if you read a text
2 message, if you go down there, it references a text --
3 well, at least in the way that I read the file, it
4 looked like it was a text from Katrina Shadix who I
5 think we had a drink with that night. I don't know. I
6 don't remember if it was there or Liam's.

7 Katrina Shadix was a big activist. She ran a
8 candidate for county commission in Seminole County a
9 couple of times, ran as a democrat. Came close to
10 winning once, lost the next time pretty badly. But, you
11 know, she was an adversary of mine, and I had met her
12 through Joel. That is -- that night, as I recall, I
13 think it was either there or Liam's. I was out with my
14 judge buddy. We were just having a good time. There
15 was no involvement in all this whatever Joel is trying
16 to say here. This was also about a week before he got
17 indicted. And you should know that by this point in
18 time, the whole world knew Joel was going to be
19 indicted. So, again, he is -- I have no idea what kind
20 of crap he is talking about here, but --

21 Q. Is it your testimony there was no J [REDACTED] and
22 I [REDACTED] at FishBones --

23 A. There was no J [REDACTED] and I [REDACTED], no. Just me and
24 my judge buddy hanging out. A circuit court judge. No
25 J [REDACTED], no I [REDACTED]. Also in that text exchange, he says,

1 Oh, you know -- I don't know who he's talking about.
2 Joel, he also described himself as being wasted in that
3 thing. So my guess is that Joel was probably at his
4 house on a bunch of Adderall and drugs and boos and just
5 texting nonsensically.

6 Q. Going back to the photographs of the different
7 women that have been involved in some of these
8 documents, we've seen. There is a picture there, do you
9 see J[REDACTED] O[REDACTED]?

10 A. Yes.

11 Q. Do you recognize Ms. O[REDACTED]?

12 A. I don't believe I have ever met that person in
13 my life.

14 Q. In Abby Greenberg's interrogatory answers, she
15 referenced a June 23, 2020, telephone call between you
16 and yourself.

17 Do you recall having that conversation shortly
18 after Mr. Greenberg was indicted on June 17, 2020?

19 A. I do.

20 Q. And what can you tell me about that
21 conversation?

22 A. I mean, I can tell you that I was in North
23 Carolina. I received a phone call from Abby, Abby's
24 phone. I answered the phone. I said, Hey, Abby, what's
25 up? She was sobbing. Sue was sobbing. They said Joel

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1 had been arrested. They gave me the details, the run
2 down as to kind of how all went down, and it was a lot
3 of detail. Like Abby had said that the cops had showed
4 up and they put her in another room. I think they drag
5 her out of bed, and she had to use the restroom, so they
6 made her use the restroom in front of them to make sure
7 they weren't going to dispose of things. But they were
8 like very serious about the fact that they thought that
9 she might have some information. They were all over it.

10 They more or less raided the house for a period
11 of hours, took Joel off, and then left them. And I
12 don't -- I'm sure they called -- I don't know how -- for
13 example, I don't know how Sue came to find that Abby
14 was -- I don't know if Abby was there all by herself and
15 Sue came by. I have no idea how that went down.

16 But by this point in time, they were on the
17 same phone together. I don't know if they were in the
18 same place or not, but they called me. And I just said,
19 Okay, well, you know, let me -- I'll just try to take
20 some burden off on my end. And after that, I just
21 started calling through things. I called Joel's PR
22 person, Michelle Oertel, who sort of ran the office for
23 him, and I let her know. She got the necessary comments
24 up together. I called Governor Desantis' office and I
25 let the chief of staff, Shane Strum, know that Joel had

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1 been arrested, that it was -- and that, you know, there
2 was no need -- now, mind you, at the time we didn't have
3 any details. I didn't know that there was going to be
4 issues with -- at the time, I just thought it was about
5 this one stocking thing.

6 And when I first found out about it, when I got
7 the sordid details, it turned out that of all things
8 that he had put segregationist in there in an attempt to
9 get me basically in trouble for this stuff, I was not
10 particularly amused with Joel at this point in time. I
11 was just trying to help his wife and mother who were
12 dealing with it and processing things.

13 And then when Joel got out, he got on the phone
14 with me, and he called -- he was with Vince Citro, and
15 he asked me what I thought. And I said, Joel, if you
16 don't retire -- if you don't resign from your office
17 right now, you will be removed in a very short period of
18 time. He said, Well, how short? And I said, if -- you
19 know, like the next time I call them and I don't say
20 you're going to quit and if they don't hear from me
21 tonight, by the morning you'll be suspended. You'll be
22 gone. And then for the rest of your life -- and, again,
23 mind you, this is before we knew that Joel was going to
24 be charged with 31 more felonies and plead guilty to six
25 of them.

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1 At the time, there was just some bizarre stuff
2 that he denied and said, I didn't do this, you know,
3 trying to get Brian Beute in trouble for all the stuff
4 he did there. So my conversation -- that would have
5 been, whatever that was, I had spoken to Abby the week
6 before extensively because Abby is very politically
7 ambitious, and she was desirous of running for the
8 county commission.

9 And Joel -- we had -- Matt and I had begged,
10 threatened Joel and told -- we had told Joel that he
11 could not run for office. If he did he would certainly
12 be indicted soon. We said it in front of his wife. We
13 said it -- it was very obvious. He had come to my house
14 like nine months before and had with him, he says, Hey,
15 what do I do with this? And he hands it to me. It is
16 about this thick. I mean, it was a thick guide, and it
17 was a Secret Service subpoena for Joel Greenberg. And
18 I -- that's when I introduced him to Vince Citro, his
19 attorney.

20 I said, Joel, I've seen some subpoenas in my
21 day. I've never seen one like this. It was line after
22 line of, you know, please disclose the contents of --
23 you know, how these crypto wallet things are XJL953
24 blah, blah, like this whole thing. It is just page
25 after page of single space. And I'm like, Joel, you're

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1 in deep shit. Let me give you some honest advice right
2 now. I don't know what you're doing, but stop it. And
3 I told him, just resign. Like, you know, this is not
4 good. And of course Joel said, I didn't do anything.
5 It's all BS. It's a misunderstanding.

6 I said, Well, Joel, the Secret Service is the
7 group that protects the president of the United States.
8 They are in charge of this cyber currency stuff. They
9 have sent you a very girthy little discovery document
10 here, and it asked you for all manners of things. What
11 I would do if I was you, I would quit my job as tax
12 collector. I would try to stay off the radar of the
13 DOJ. I would go back to being a radio guy, and I would
14 get out of this stuff right away.

15 He probably took that and went and hired Vince
16 Citro and then road it out. And so Matt Gaetz and I got
17 very, very, very aggressive with Joel. He was trying to
18 get a campaign donation. I said, Joel, you're just --
19 this is such a bad idea for you. You know, you just
20 can't do this stuff. So then the beginning of that
21 qualifying week would have been whatever the week --
22 whatever day he got indicted, the week before was
23 qualifying --

24 Q. June 17, 2020 is when he was actually indicted.

25 A. So the week before, whenever that was, he

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1 called me or he texted. He did something. We had some
2 communication where he told me that Vince had told him
3 everything was fine and that he would have no issues
4 moving forward. And, again, I called BS, but, I mean,
5 the thing about attorney/client it makes it very hard to
6 validate that sort of advice. But he said that he was
7 told that everything was fine.

8 So then Abby decided that she wanted to run for
9 county commission. She wanted to run for the county
10 commission district five seat. It was an open seat.
11 Brenda Carey had been there for years. Joel had been
12 big rivals with Brenda Carey, and they had -- I think
13 Brenda was the one that ultimately got the investigation
14 started that got Joel in trouble.

15 And so Abby was highly desirous of running, and
16 so she and I texted, had a few conversations that week.
17 The general subject of which was just how much money
18 would the Greenbergs give. And she had thought -- Abby
19 was of the impression that Joel's parents would give a
20 fair amount of money when Joel wasn't going to run. I
21 think that they had sort of gotten a taste for what it
22 was like to have -- you know, be in political office.

23 And so Matt and I were supportive of that. We
24 said, listen, Abby would be much better than Joel. Get
25 the hell out of there. He came and said that he

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1 received an all clear. So, again, with that very
2 obvious lie as demonstrated by virtue of the fact that
3 he would be indicted less than two weeks later, there's
4 not much more we could say.

5 I just said, Joel, you're not a public
6 official. If I was on a scale of one to ten mean to
7 Joel about this, ten being the worst, I was probably an
8 eight. Matt was a ten. He's like, You're not fit for
9 public service. You're a horrible public servant.
10 You're mentally ill. You have drug addiction issues.
11 Your family, you know, continues to fit the bills. And
12 we were just very harsh in the idea that Joel did not
13 need to do that. And not to be surprised at all, the
14 next week is -- after he qualified, guess what, he got
15 indicted.

16 MR. ANDRADE: So we're at 5:18. Given the
17 length of my client's answers, this will probably be
18 the last question, just FYI.

19 BY MR. PERKINS:

20 Q. All right. The JW Marriott, you believe
21 that -- it sounds like you believe that Abby Greenberg
22 did something wrong at the JW Marriott.

23 A. No. I think that Abby Greenberg was dishonest
24 with my wife about to get her there under the pretenses
25 that Joel was not at the JW Marriott. My wife is a good

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1 friend to her friends. And, you know, when this
2 happened, you know, Abby -- I don't know. I think most
3 people would assume that something like that happens,
4 you're going to be crest fallen and stressed and
5 everything. And so Rebekah wanted to go check on her,
6 and she said, you know, I really don't want to see Joel.

7 She said, Joel's not here. Rebekah I remember
8 gets in the car, she calls me and says, Joel's there but
9 he's golfing. I said, Rebekah, do what you want to do,
10 but, I mean, Joel, he's -- Joel is going to do this. I
11 don't -- whether Abby lied and thought he wasn't there
12 or whether the circumstances changed, I don't have an
13 opinion on that. I don't know -- you know, I do know
14 that when she got there, she told my wife and my wife
15 shared with me that Abby said her marriage had never
16 been better because now she had -- the word she used
17 reminded me of -- I think it was Seinfeld maybe that it
18 was she had hand. She had more hand in her relationship
19 than she'd ever had, and now the Greenbergs basically
20 had to do whatever she said because she controlled their
21 grandkids.

22 Q. And did you ever discuss the JW Marriott WITH
23 Abby Greenberg?

24 MR. ANDRADE: We're at 5:20. Yeah, we're at
25 5:20.

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1 BY MR. PERKINS:

2 Q. Did you ever discuss the JW Marriott visit with
3 Abby Greenberg?

4 A. I don't know that I ever talked to Abby
5 Greenberg after that. Do believe that the last -- I
6 mean, I remember talking to her extensively during the
7 week where she was there -- when she was thinking about
8 qualifying. The last conversation I had with her was on
9 Thursday. I said, You need to get a hard number from
10 the Greenbergs that will be the amount of money that you
11 will be able to spend on this, and she didn't qualify
12 the next day.

13 And I think I sent her a text message something
14 to the effect of I guess that didn't go well or
15 something like that. I don't remember her response, but
16 there was some superficial communication like that. And
17 then after that, the next time I would hear from her
18 would be when she called me crying the next week.

19 MR. ANDRADE: Have a great day, guys.

20 MR. PERKINS: All right. That's my seven
21 hours. I'll reserve. You know, other people are
22 going to ask some questions. I have some questions
23 left, but I'll let everybody else have a chance.

24 THE WITNESS: Give you this back?

25 MR. PERKINS: We're done for the day.

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1 THE VIDEOGRAPHER: If there are no objections,
2 going off record. The approximate time is 5:21 p.m.
3 (The deposition was continued at 5:21 p.m.)
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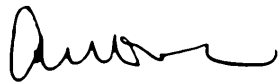
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CERTIFICATE OF OATH

STATE OF FLORIDA:
COUNTY OF ORANGE:

I, AMBER PORTELLO, Notary Public, State of Florida,
do hereby certify that CHRISTOPHER DORWORTH personally
appeared before me on August 6, 2024, and was duly sworn
and produced a Florida driver's license as
identification.

Signed this 14th day of August, 2024.



AMBER PORTELLO

Notary Public, State of Florida
My Commission No.: HH124775
Expires: MAY 4, 2025

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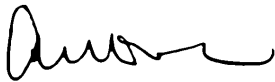
CERTIFICATE OF REPORTER

STATE OF FLORIDA:
COUNTY OF ORANGE:

I, AMBER PORTELLO, Notary Public, State of Florida, certify that I was authorized to and did stenographically report the deposition of CHRISTOPHER DORWORTH; that a review of the transcript was requested; and that the foregoing transcript, pages 8 through 382, is a true and accurate record of my stenographic notes.

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

DATED this 14th day of August, 2024.



AMBER PORTELLO

CHRISTOPHER DORWORTH
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1 Reference No.: 11551616

2

3 Case: DORWORTH V. GREENBERG

4

DECLARATION UNDER PENALTY OF PERJURY

5

6 I declare under penalty of perjury that
7 I have read the entire transcript of my Depo-
8 sition taken in the captioned matter or the
9 same has been read to me, and the same is
10 true and accurate, save and except for
11 changes and/or corrections, if any, as indi-
12 cated by me on the DEPOSITION ERRATA SHEET
13 hereof, with the understanding that I offer
14 these changes as if still under oath.

10

11

12

Christopher Dorworth

13

14

NOTARIZATION OF CHANGES

15

(If Required)

16

17

Subscribed and sworn to on the _____ day of

18

19

_____, 20____ before me,

20

21

(Notary Sign)_____

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23

(Print Name) _____ Notary Public,

24

25

in and for the State of _____

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1 Reference No.: 11551616
Case: DORWORTH V. GREENBERG

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24 SIGNATURE: _____ DATE: _____
25 Christopher Dorworth

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1 Reference No.: 11551616
Case: DORWORTH V. GREENBERG

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Christopher Dorworth