

CAUSE NO. D-1-GN-18-006623

SCARLETT LEWIS
Plaintiff

VS.

ALEX E. JONES, INFOWARS,
LLC, AND FREE SPEECH
SYSTEMS, LLC,
Defendants

* IN THE DISTRICT COURT OF
*
*
*
* TRAVIS COUNTY, TEXAS
*
*
*
* 53RD JUDICIAL DISTRICT

ORAL/VIDEOTAPED DEPOSITION

OF

ALEX E. JONES

Thursday, March 14, 2019

ORAL/VIDEOTAPED DEPOSITION OF ALEX E. JONES,
produced as a witness at the instance of the Plaintiff,
and duly sworn, was taken in the above-styled and
numbered cause on Thursday, March 14, 2019, from
12:02 p.m. to 4:33 p.m., before Debbie D. Cunningham,
CSR, reported via Machine Shorthand at the offices of
Waller Lansden Dortch & Davis, LLP, 100 Congress Avenue,
Suite 1800, Austin, Texas, pursuant to the Texas Rules
of Civil Procedure and/or any provisions stated on the
record or attached hereto.

APPEARANCES

COUNSEL FOR PLAINTIFF:

KASTER LYNCH FARRAR & BALL, LLP
1010 Lamar, Suite 1600
Houston, Texas
(T) 713.221.8300

By: Mark D. Bankston, Esq.
mark@fbtrial.com

AND

William Ogden, Esq.

COUNSEL FOR DEFENDANTS:

GLAST, PHILLIPS & MURRAY, P.C.
14801 Quorum Drive, Suite 500
Dallas, Texas
(T) 972.419.8300

By: Mark Enoch, Esq.
mkenoch@gpm-law.com

AND

BARNES LAW, LLP (PRO HAC VICE)
601 South Figueroa St., Suite 4050
Los Angeles, California
(T) 213.294.3006

By: Robert E. Barnes, Esq.
barneslaw@barneslawllp

VIDEOGRAPHER:

Joe Bazan

ALSO PRESENT:

Fred Zipp
Rob Dew

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1 (Thursday, March 14, 2019, 12:02 p.m.)

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

3 THE VIDEOGRAPHER: We're on the record for
4 the videotaped deposition of Alex Jones, taken on
5 Thursday, March 14, 2019. The time is approximately
6 12:02 p.m.

7 Will the court reporter please swear in
8 the witness.

9 ALEX E. JONES,
10 having taken an oath to tell the truth, the whole truth,
11 and nothing but the truth, was examined and testified as
12 follows:

13 EXAMINATION

14 BY MR. BANKSTON:

15 Q. Mr. Jones --

16 MR. BARNES: When do you want me to go on
17 the record?

18 MR. BANKSTON: Oh, yeah, let's do that
19 now, actually, Mr. Barnes. Why don't you do that for
20 me?

21 MR. BARNES: Thank you.

22 This is Robert Barnes. I'm General
23 Counsel for InfoWars and Mr. Jones and in this context
24 Free Speech Systems, LLC, here representing him. I have
25 a motion for pro hac pending; and the agreement is I can

1 represent the Defendant, Mr. Jones, here with the
2 acknowledgment that I am bound by the Texas Rules of
3 Civil Procedure, the Texas Ethical and Professional
4 Rules, and the Texas Sanctions Rules and will be bound
5 by them accordingly.

6 MR. BANKSTON: Thank you, Mr. Barnes.

7 MR. BARNES: Oh, you do want the mic on?
8 No problem.

9 EXAMINATION

10 BY MR. BANKSTON:

11 Q. Mr. Jones?

12 A. (No audible response.)

13 Q. Mr. Jones?

14 A. Uh-huh.

15 Q. I want to go back to when this all started.

16 And in fairness to you, one of the things that you've
17 tried to make clear is that you're not the one who
18 started the theory that Sandy Hook was a false flag,
19 correct?

20 A. Yes, sir.

21 Q. And that's something that was borne out by
22 InfoWars archives and that you've been able to rely on
23 in court, correct?

24 A. I don't exactly understand what you're saying.

25 Q. Okay. Let me help you with that.

1 (Exhibit 1 marked.)

2 Q. (BY MR. BANKSTON) I'm going to be showing you
3 what I'm now marking as Exhibit 1. It's a double-sided
4 document. Mr. Jones, that is a July 27th, 2018
5 Affidavit which you executed, correct?

6 A. Yes, sir.

7 Q. I want to go through this affidavit with you
8 and the highlighted part sentence by sentence. Do you
9 see the pale orange part which I'm now going to read to
10 you? "Plaintiffs claim that I started the controversy
11 and/or conspiracy about Sandy Hook being a hoax. This
12 is not true." I read that correctly?

13 A. I need to read the full page.

14 Q. Please take a moment to read it.

15 A. (Witness silently reading document.)

16 It's just the orange part you want me to
17 read?

18 Q. I actually just read it to you and wanted to
19 know if I had read it correctly. Allow me to read it
20 for you again, Mr. Jones. "Plaintiffs claim that I
21 started the controversy and/or conspiracy theory about
22 Sandy Hook being a hoax. This is not true." I read
23 that correctly?

24 A. Yes, uh-huh.

25 Q. Okay. The next sentence says, "Before I ever

1 publicly commented on any issues relating to Sandy Hook,
2 I learned that others with whom I have no affiliation or
3 relationship had already posted articles" -- excuse me,
4 Mr. Jones, if you would like to flip the page --
5 "relationship had already posted articles online making
6 this claim and questioning the events as reported." I
7 read that sentence correctly?

8 A. Yes, sir.

9 Q. So there were a variety of articles and
10 YouTube videos questioning the events that started
11 getting popular in the time period after the shooting.
12 I assume you saw some of those?

13 A. Yes, sir.

14 Q. How long is this are we talking? Are we
15 talking days, weeks, months?

16 A. I don't know. I don't want to answer
17 incorrectly. I don't remember the exact times. So I
18 really can't state that time, but I think a month or
19 longer.

20 Q. Sure. Okay. I remember there was -- about a
21 month after the shooting, there was a relatively popular
22 YouTube video that went viral. Do you recall this
23 video?

24 A. There were a lot of -- 2 million, 10 million.
25 It was a bunch of videos. It was a firestorm of -- on

1 the Internet about it.

2 Q. Okay. And it was then, when you saw that,
3 that you started covering it and started commenting on
4 Sandy Hook?

5 MR. BARNES: Objection as to define Sandy
6 Hook. Object as to form.

7 Q. (BY MR. BANKSTON) You can go ahead and
8 answer, Mr. Jones.

9 A. No, I started commenting on Sandy Hook that
10 they would use it to go after our guns and that the
11 media always hyped up school shootings and was causing
12 copycat events, that the mainstream media were basically
13 psychic vampires promoting mass shootings so they could
14 blame gun owners and try to take the Second Amendment
15 away, which they pushed to repeal the Second Amendment.

16 So for the first month or so -- and,
17 again, this was almost seven years ago -- but we've gone
18 back and looked at some of it in trying to find -- at
19 least three weeks, four weeks or so. And then it was
20 such a firestorm on the Internet, it's like, no, this
21 isn't Prozac; this isn't video games, like I was saying,
22 I thought, like other shootings that happened. This
23 was, you know, some type of staged event or multiple
24 shooters or people in the woods, things like that. It
25 was a whole range of theories in a big Internet debate

1 going on that I then reported on and gave analysis to my
2 opinions.

3 **Q. Correct. Okay.**

4 A. And I think that's what was weeks after. I
5 can't remember the exact number. I immediately when it
6 happened, you know, said, "Oh, look another person in a
7 black trench coat, you know, a loner on psychotropics
8 that came out, shoot-'em-up video games." And I
9 remember being criticized by the video game industry
10 saying, "Don't you blame video games."

11 **Q. What I'm curious about, Mr. Jones, can you**
12 **flip the page back over again and look at the beginning**
13 **of the yellow sentence? So when you say, "Before I ever**
14 **publicly commented on any issues relating to Sandy**
15 **Hook," you saw other stuff going on, right, you mean**
16 **whether it was staged or not? In other words, you made**
17 **some comments about Sandy Hook when it first happened;**
18 **but in terms about it being a false flag or staged or**
19 **some sort of hoaxed event, right, that came later?**
20 **You're not the one who started that?**

21 MR. BARNES: Objection as to form.

22 A. I know that I didn't start it. And I think
23 it's a boilerplate. Anytime there's a big public event,
24 like Jussie Smollett or babies in incubators in Iraq, a
25 lot of people question, you know, whether it's real.

1 President Trump questioned right after he got elected
2 and was first in office whether the attacks on the
3 Jewish cemeteries were being staged, and it turned out
4 they were.

5 So, I mean, again, going from memory, I
6 remember looking at it as your standard horrible tragedy
7 of psychotropic drugs, a kid in a cult, you know, type
8 stuff, like Columbine, shoot-'em-up video games. I
9 remember that's where I was going because that's where
10 all the other shootings basically came from.

11 **Q. Sure.**

12 A. And so I can't specifically -- I mean, I'm
13 going from the best of my memory.

14 **Q. Okay. Well, Mr. Jones, I want to show you**
15 **some video clips of some things you were saying as the**
16 **news broke of Sandy Hook and in a video that day that**
17 **you titled Connecticut School Massacre Looks Like False**
18 **Flag, Says Witnesses.**

19 MR. BANKSTON: Can you play the clip Day
20 of Sandy Hook?

21 (Video playing.)

22 **Q (BY MR. BANKSTON) Mr. Jones, this is a video**
23 **where you made comments on issues relating to Sandy Hook**
24 **and you put forward a theory that it could be staged by**
25 **the Government to take away our guns, correct?**

1 MR. BARNES: Objection. It seems like
2 this is a video, from watching it, that's different
3 pieces put together.

4 MR. BANKSTON: Correct.

5 MR. BARNES: Okay. So it's not from --
6 so different things are out of context. Is there any
7 way to get, like, the whole --

8 MR. BANKSTON: You own the whole video,
9 and it's been produced with Mr. Zipp's affidavit.

10 MR. BARNES: But for his purposes --

11 MR. BANKSTON: If he wants to go watch an
12 entire four-hour video, I'm not going to have time --

13 MR. ENOCH: Mark, it has not been
14 produced with Zipp's --

15 MR. BANKSTON: Actually, Connecticut
16 False Claim full video has been produced; and it's been
17 in a court. If you want to argue about that and object,
18 you can object at that time when it's offered. That
19 objection's preserved. You don't have to object to form
20 on that one.

21 **Q. (BY MR. BANKSTON) Mr. Jones, that was a video**
22 **in which you made statements about Sandy Hook in which**
23 **you said -- put forth the theory it could be staged to**
24 **take away our guns?**

25 A. That's a Media Matters edited -- that's Media

1 Matters edited derivative.

2 Q. Is that you on that tape?

3 A. It's edited.

4 Q. And that's you talking about: Don't think
5 this couldn't be staged. Our Government kills little
6 kids all the time. That's you saying those words?

7 A. With SMART moms and things, yeah. It's edited
8 out of context.

9 Q. The truth is, Mr. Jones, you were the first
10 person in the world to make the false flag theory about
11 Sandy Hook and you did it before the bodies were even
12 cold; that's the truth?

13 MR. BARNES: Objection as to form and to
14 the defin- -- are we going to have, like, set
15 definitions of the words, like --

16 MR. BANKSTON: No, you can object to
17 form. Yeah, that's Rule 199. Just object to form.

18 MR. BARNES: That's fine.

19 Q. (BY MR. BANKSTON) Mr. Jones, you said in your
20 affidavit that before you commented on any issues
21 relating to Sandy Hook, you saw other things that other
22 people were doing. That affidavit has false statements,
23 doesn't it?

24 A. No.

25 Q. So we didn't just see you commenting on issues

1 relating to Sandy Hook?

2 A. That was callers calling up.

3 Q. You're going to tell me you watched that video
4 and you weren't commenting on Sandy Hook?

5 A. I told you five minutes ago before you played
6 it that as a boilerplate of any big public event,
7 whether it's Jussie Smollett or whether it's babies
8 having their brains bashed out in incubators or WMDs,
9 that I upfront questioned it because of things from
10 Operation Northwoods and hundreds of declassified real
11 staged events where our Government admits that it staged
12 events. Now, I always boilerplate say that we need to
13 investigate the news reportage of this and see what's
14 true. There's such a long history of governments and
15 corporations and legal groups engaging in fraud. And I
16 said that before you played the clip.

17 MR. BANKSTON: Objection, nonresponsive.

18 Q. (BY MR. BANKSTON) Mr. Jones, I have a very
19 simple question for you: That video you just saw of you
20 talking, were you talking about Sandy Hook?

21 A. The edited pieces were.

22 Q. The pieces that I edited and put together of
23 you speaking, I edited them. When I edited those pieces
24 together and put them in front of you, was that you on
25 the camera?

1 A. I saw a Media Matters video of that before.
2 You're saying you edited that?

3 Q. **It's not an important deal.**

4 A. But you did edit it?

5 Q. **I did, yes. I'm not here to answer questions.**

6 A. Three-second clips together.

7 Q. **Those clips were edited together by me two**
8 **weeks ago.**

9 A. Why didn't you just play them unedited?

10 Q. **That's -- Mr. Jones, I'm not here to answer**
11 **your questions. You understand you're here because**
12 **people have sued you and you have four hours in which**
13 **they're to ask you questions. Are you going to do that**
14 **for me today?**

15 A. Yes, I'm answering your questions.

16 Q. **So in that video, "yes" or "no," you were**
17 **commenting about Sandy Hook?**

18 A. In the edited video I was commenting on Sandy
19 Hook.

20 Q. **You'll agree over the years you've seen**
21 **various anomalies relating to Sandy Hook?**

22 A. I've seen reported anomalies.

23 Q. **A lot of those anomalies are in videos, things**
24 **like the helicopter video of people being detained in**
25 **the woods. Do you know what I'm talking about?**

1 A. Yes.

2 Q. Okay. There's the Anderson Cooper interview
3 with Ms. De La Rosa. Do you know what I'm talking about
4 there?

5 A. I know who Anderson Cooper is.

6 Q. You know what the blue screen video is --

7 A. Yes.

8 Q. -- where his nose disappears?

9 A. Yes.

10 Q. Okay. You know that there's some videos of
11 some interviews that were just kind of strange, right?
12 Those are something you've seen?

13 A. Yes.

14 Q. There's been discussion on InfoWars about the
15 interior videos taken of the school itself, right?

16 A. Yes.

17 Q. There's been discussion on InfoWars about dash
18 cam video footage at Sandy Hook? Remember Mr. Dew
19 talking about videos of the officers eating their
20 lunches on top of their cars?

21 A. I don't remember that.

22 Q. Okay. But if there was -- if Mr. Dew talks
23 about dash cam footage, you have no reason to believe
24 he's lying, do you?

25 A. I'm still not familiar with what you're

1 talking about.

2 Q. Okay. And InfoWars has also discussed
3 questioning the official story from time to time,
4 correct?

5 A. Uh-huh.

6 Q. Including the official report about Sandy Hook
7 that was released? There's some weird things in there
8 that have been questioned on InfoWars?

9 A. The one that came out, like, five or six years
10 later.

11 Q. I think in December of 2013, so about a year
12 later.

13 A. The state police report?

14 Q. The state police report. Are you familiar
15 with what I'm talking?

16 A. That's so long ago, six years ago, I just...

17 Q. Well, I mean, there's anomalies all over the
18 place is what I'm saying. You've seen --

19 A. There have been a lot of people asking a lot
20 of questions that isn't legal yet in this country.

21 Q. Right. Recently your lawyer said in a legal
22 document, "There is no dispute that the Sandy Hook
23 tragedy was real with tragic loss of life." Do you
24 stand by that?

25 A. I'm sorry. You're talking so fast.

1 Q. Sure, sure. Let me slow down a little bit for
2 you, Mr. Jones. Recently your lawyer said in a legal
3 document, "There is no dispute that the Sandy Hook
4 tragedy was real with tragic loss of life." You stand
5 by that; that's what you admit is true now?

6 A. Yes.

7 Q. Okay. But in the past -- before you had all
8 the information, in the past, you didn't know exactly
9 what happened at Sandy Hook? You've questioned it?

10 A. Oh, certainly in the past. You mean in the
11 last seven years?

12 Q. Sure.

13 A. Yes.

14 Q. And, in fact, over the course of covering
15 Sandy Hook over the past six or so years, you've always
16 entertained serious doubts about what really happened
17 that day?

18 A. I'm sorry. I don't understand.

19 Q. Sure. Over the course of Sandy Hook, you've
20 questioned the official story. You've had serious
21 doubts that the official story was true?

22 A. I've always, from the beginning, had questions
23 about any big public event that's hyped up because so
24 many times parts of it are being covered up or things
25 are being staged or they're not letting a new crisis go

1 to waste. Sometimes things are completely made up, like
2 the babies in the incubators, which is admitted. You
3 know, they've got the PR firm that said the babies
4 brains were all bashed out and we lost all those wars.

5 **Q. I've heard you say that.**

6 A. And so it's just been -- and the WMDs. The
7 WMDs were a lie, too, and then watched -- that have
8 killed millions of people.

9 MR. BANKSTON: Objection, nonresponsive.

10 A. Well, I'm trying to answer the question.

11 **Q. (BY MR. BANKSTON) Oh, do you know what**
12 **question you're answering?**

13 A. Well, you were asking a question of, like --
14 I'm not sure. You said you've always questioned; and
15 I'm saying, no, I questioned it up front. The public
16 questioned it. And then, as I had time to go over it, a
17 lot of the anomalies turned out to not be accurate; and
18 I believe school shootings happen.

19 **Q. All right. So I think a shorter way is you**
20 **had doubts; you had questions until you didn't. At some**
21 **point -- I mean, things change; I understand that. But**
22 **there have been points in which you've questioned the**
23 **official narrative. You've had serious doubts about**
24 **some of these things?**

25 A. Yes.

1 Q. And these anomalies that have come up, these
2 things have raised serious doubts. You've had serious
3 doubts about the anomalies, too?

4 A. Yes.

5 Q. Okay. By the spring of 2013 or so, let's say
6 just a few months after the shooting, by that point, you
7 had gone from theory to just straight up telling your
8 audience, "Sandy Hook was staged, and the evidence is
9 overwhelming"?

10 MR. BARNES: Objection as to form.

11 Q. (BY MR. BANKSTON) Correct?

12 A. Well, what does "staged" mean?

13 Q. I'm just asking what you were telling your
14 audience.

15 A. No, no --

16 Q. I'm not answering your questions, Mr. Jones.
17 You're going to tell me what "staged" means when you
18 said it. So what I'm asking you is: A few months after
19 the shooting, you had gone from theory to straight up
20 telling your audience, "Sandy Hook was staged, and the
21 evidence was overwhelming." True or false?

22 A. But I'm asking you to define what you mean by
23 "staged."

24 Q. I'm not asking -- I'm not asking for a
25 definition of "staged." I don't care what "staged"

1 **means. I'm asking: Did you say it?**

2 A. I don't have it in front of me; but, I mean, I
3 did say that I saw a lot of anomalies that I thought
4 that certainly large parts of the way it was being
5 handled, you know, the Supreme Court came out saying
6 they covered up some of the reports on what happened
7 with the incident. I think a lot of that's been borne
8 out that when you see a cover-up going on, you're not
9 sure what's happening inside of it.

10 And later we just learned it was a
11 cover-up of, I think, some of the negligence there in
12 the town and with the school. I don't know the teacher
13 that tried to save the kids was negligent -- that
14 person's a hero -- and sadly got sued. But I do, you
15 know, clearly think there was some cover-up, but it
16 wasn't in that it was all, the whole thing, staged, but
17 that the way the media handled it was synthetic. They
18 way it was used against gun owners was synthetic.

19 MR. BANKSTON: All right, Mr. Jones.
20 Objection, nonresponsive.

21 Can you play the clip Overwhelming for
22 me, please?

23 Q. (BY MR. BANKSTON) Mr. Jones, I want to show
24 you clip from April 16th, 2013.

25 (Video playing.)

1 Q. (BY MR. BANKSTON) That's you on the video,
2 right?

3 A. Yes, that's me on the short video.

4 Q. Yeah, it's a short video. I understand.

5 By the end of 2014 you had personally
6 done intensive research, and you concluded Sandy Hook
7 was all fake?

8 MR. BARNES: Objection as to form. And
9 are you asking him to repeat a quote?

10 MR. BANKSTON: No. I'm asking him --

11 Q. (BY MR. BANKSTON) By the end of 2014 you had
12 personally done intensive research; and you concluded it
13 was all fake, correct?

14 MR. BARNES: Still objection as to form.

15 A. The specific areas I was talking about being
16 fact, not in a totality.

17 MR. BANKSTON: Okay. Can you play the
18 clip for me?

19 Q. (BY MR. BANKSTON) Mr. Jones, I'm going to
20 play you a clip from December 29th, 2014.

21 MR. BANKSTON: Go ahead and play that for
22 me, please.

23 (Video playing.)

24 Q (BY MR. BANKSTON) That's you saying you did
25 deep research, correct?

1 MR. BARNES: The same objection as to
2 form and that these are highly edited excerpts from --
3 (Simultaneous speakers.)

4 MR. BANKSTON: Can you stop with speaking
5 objections.

6 MR. BARNES: Obviously --

7 MR. BANKSTON: Yeah, I know exactly what
8 you're doing; and you need to say: Objection, form;
9 objection, leading; assert a privilege or stay quiet.
10 You do not need to be making suggestive objections about
11 the content of the evidence and what its form is. You
12 don't need to be doing that, Mr. Barnes.

13 MR. BARNES: I'm not trying to do that.
14 I'm just saying that these are videos that are highly --

15 MR. BANKSTON: That's a great opinion. I
16 don't understand why your opinion is relevant to these
17 questions right now. You wouldn't be doing this in a
18 courtroom. Don't do it in my deposition right now.

19 MR. BARNES: Oh, yeah, in a courtroom it
20 wouldn't come in because it wouldn't be admissible
21 because of the rule of completeness.

22 MR. BANKSTON: Mr. Barnes, that's why
23 your objection's preserved as to the form of that
24 evidence. You don't have to raise an objection. The
25 only reason you would be doing it is to possibly

1 influence the witness.

2 MR. BARNES: So can we have a standing
3 stipulation that when I object to form, that includes an
4 objection to the rule of completeness?

5 MR. BANKSTON: Absolutely.

6 MR. BARNES: Thank you. Then we're good.

7 MR. BANKSTON: And for the record every
8 objection to every piece of evidence is preserved under
9 the Texas Rules, which --

10 MR. BARNES: I was objecting in a way
11 that --

12 MR. BANKSTON: Mr. Barnes --

13 (Simultaneous speakers.)

14 THE REPORTER: Excuse me, Counsel. You
15 are speaking over one another. You're making the record
16 very muddled.

17 MR. BARNES: I'm sorry.

18 So we have a standing stipulation that
19 when I object to form, that includes an objection on
20 rule of completeness grounds to any evidence that -- or
21 a document or exhibit would otherwise include other
22 excerpts.

23 MR. BANKSTON: Thank you, Mr. Barnes.

24 MR. BARNES: Perfect.

25 Q (BY MR. BANKSTON) Over the next few years,

1 Mr. Jones, you did dozens and dozens of videos with that
2 same message about Sandy Hook being staged, correct?

3 MR. BARNES: Objection as to form.

4 A. No.

5 Q. (BY MR. BANKSTON) Okay. Well, I want to talk
6 about some of the claims you've made over the years.
7 The first thing I want to talk to you about is circles
8 and I want to show you a video clip of something you
9 said on November 18, 2016; April 22nd, 2017; and
10 June 13, 2017.

11 MR. BANKSTON: Can you play me the video
12 clip Going in Circles?

13 (Video playing.)

14 MR. BANKSTON: Can you give me the last
15 frame, please?

16 Q (BY MR. BANKSTON) Mr. Jones, when you said
17 you'd be running them away from the building, what did
18 you mean by that?

19 A. The police should be getting the children away
20 from the building.

21 Q. Right. Okay. So the police should be --
22 scratch that.

23 No doubt there's a dangerous situation, a
24 shooter on campus? Is it dangerous when there's
25 somebody shooting up a school?

1 A. Yes.

2 Q. Okay. And so you would think if proper
3 procedures were being followed in keeping them safe,
4 this looks pretty weird, doesn't it, if they're not
5 being run away from the building, right?

6 A. Yes.

7 Q. But, Mr. Jones, when you said this to your
8 audience, you knew that wasn't the school. You knew
9 that, right?

10 MR. ENOCH: Are you saying that's part of
11 his broadcast?

12 MR. BANKSTON: Yes. It says InfoWars
13 right there on the bottom.

14 MR. ENOCH: Is that part of the same
15 broadcast?

16 MR. BANKSTON: Yes. Do you see where it
17 says InfoWars?

18 MR. ENOCH: As long as you're
19 representing that the video that you're showing him now
20 with the people walking across was part of the same
21 broadcast --

22 MR. BANKSTON: Okay. First of all --

23 MR. ENOCH: -- statements.

24 MR. BANKSTON: First of all, there's
25 only going to be one lawyer defending this deposition,

1 Mr. Enoch; and one was already chosen. And, no,
2 Mr. Enoch, there will be one lawyer speaking on the
3 record. There is one lawyer defending the deposition.
4 I am not being tag-teamed by the two of you. And so I
5 would appreciate it if you kept your mouth shut for this
6 deposition and let Mr. Barnes defend the deposition.

7 For the record in the bottom corner of
8 this screen is a large InfoWars logo. This was
9 broadcast on InfoWars.

10 **Q. (BY MR. BANKSTON) So, Mr. Jones, my question**
11 **to you is: When you broadcast this to your audience and**
12 **told them this, you knew that wasn't the school,**
13 **correct?**

14 MR. ENOCH: Mark, would you please answer
15 my question? And it's a simple question: If you
16 represent that the video of the school that you're
17 showing, the firehouse, was part of the same broadcast
18 in which he made his statements --

19 MR. BANKSTON: Yes. Mr. Enoch, we just
20 watched it. Do you really think I edited his words over
21 a different video?

22 MR. ENOCH: Well, what I think doesn't
23 matter. Thank you for answering the question.

24 MR. BANKSTON: Mr. Enoch, I would
25 appreciate it if you kept quiet the remainder of this

1 deposition and let Mr. Barnes defend the deposition.

2 Q. (BY MR. BANKSTON) Mr. Jones, you knew that
3 wasn't the school?

4 MR. BARNES: Object to the form.

5 Q. (BY MR. BANKSTON) Correct?

6 A. I did not know that. This is so edited it
7 looks like two different shows together. Can you play
8 it again? It's so edited. I've never...

9 MR. BANKSTON: Can you play at least the
10 last part there where he's doing the video?

11 THE WITNESS: Just play the whole thing.

12 MR. BANKSTON: Play the whole video again
13 for him.

14 Q. (BY MR. BANKSTON) These are three different
15 clips. And I'll remind you, Mr. Jones, these are from
16 November 18, 2016; April 22nd, 2017; and June 13, 2017.

17 A. You just told him it was the same broadcast.

18 Q. And this one right here is the same broadcast,
19 Mr. Jones.

20 MR. ENOCH: Is this the --

21 MR. BANKSTON: This is November 18th,
22 2016.

23 (Video playing.)

24 Q (BY MR. BANKSTON) Let's see if we can help
25 you understand this. Hold on, Mr. Jones. Let's see if

1 we can help you understand this. You understand this
2 first video where it says Sandy Hook Vampires Exposed,
3 you see that?

4 A. Yes. That's about the media.

5 Q. Correct. That's April 22nd, 2017. That's an
6 InfoWars video.

7 A. It's blurred. I can't see that.

8 Q. In other words, you know that there was an
9 InfoWars video with that title, correct?

10 A. I believe so.

11 Q. Okay. And then we saw a second clip from your
12 Megyn Kelly interview, right?

13 A. Which was highly edited.

14 Q. Sure. And I edited a piece of it in here,
15 correct? That was from the Megyn Kelly --

16 MR. ENOCH: Wait. Time out. Time out.
17 We need to take a break. You just told me that
18 everything you showed him was from one video.

19 MR. BANKSTON: No, Mr. Enoch. I told you
20 what was on the screen and the audio were from the same
21 video.

22 MR. ENOCH: If you want to take a fair
23 deposition, you're entitled to do that. You are not
24 entitled to misrepresent to the witness three different
25 dates in deposition and say -- three different dates of

1 video and say this was the same video. Were these, all
2 the clips that you showed him the same video, "yes" or
3 "no"?

4 MR. BANKSTON: No. And we've said that
5 repeatedly from the moment I asked him. They were three
6 different dates. I read the three different dates to
7 you, Mr. Enoch. So your indignation can calm down, and
8 I'd like you to be quiet in this deposition.

9 MR. ENOCH: In what video --

10 MR. BANKSTON: Mr. Barnes, can you please
11 instruct your counsel to be quiet? You are defending
12 this deposition.

13 MR. ENOCH: Let's take a break.

14 MR. BANKSTON: Actually, I've got a
15 question on the floor. We're not taking a break.

16 MR. BARNES: You're entitled to do
17 depositions the way you want, but I'm just saying it's
18 creating a lot of unnecessary confusion.

19 MR. BANKSTON: And, hey, I'm walking
20 through it with him right now.

21 MR. BARNES: Okay.

22 MR. BANKSTON: We're going to clear up
23 all that confusion. All right? That's what we're going
24 to do. Okay?

25 Q. (BY MR. BANKSTON) Mr. Jones, we've talked

1 about this one. This is the Sandy Hook Vampires
2 Exposed. And we've talked about the second clip being
3 from the Megyn Kelly interview, right? Correct?

4 A. Yes.

5 Q. Okay. Now then, the third clip that starts at
6 the end where it shows the video that we were talking
7 about and you remember there was something you did
8 called Final Statement on Sandy Hook in November of
9 2016?

10 MR. ENOCH: Mark --

11 MR. BANKSTON: Mr. Enoch --

12 MR. ENOCH: -- you are -- maybe you don't
13 intend to do it, Mark; but you're stating something
14 that's not correct. You just said one is from the Megyn
15 Kelly interview and you gave us three dates and none of
16 them are the Megyn Kelly date.

17 MR. BANKSTON: I'm sorry if I've given
18 you a wrong date. It was June 13th, 2017.

19 MR. ENOCH: That is not the Megyn Kelly
20 broadcast.

21 MR. BANKSTON: Okay. If I've misstated
22 the date, that's my -- and you can object to that or you
23 can do whatever you want.

24 Q. (BY MR. BANKSTON) Do you agree that's the
25 Megyn Kelly broadcast we were watching? That interview

1 in the middle was from the Megyn Kelly interview?

2 A. I saw part of that. I mean, it was so fast,
3 I...

4 Q. We'll keep it slow. We'll keep going --

5 A. I watch Court TV and stuff. Nobody plays
6 edited tapes.

7 Q. Okay. This video here that we're looking at
8 is something from Final Statement on Sandy Hook. Do you
9 remember doing a video from Final Statement on Sandy
10 Hook?

11 A. I do remember that.

12 Q. Okay. And this video here is where you showed
13 this footage, and you made some comments about kids
14 going in circles, right?

15 MR. BARNES: Objection as to form.

16 A. If that's from it, I remember making comments.

17 Q. (BY MR. BANKSTON) Okay. Mr. Jones, do you
18 see that ambulance right there?

19 A. Yes.

20 Q. Okay. I want to play you a couple of clips.

21 MR. BANKSTON: Can you play me --

22 Q. (BY MR. BANKSTON) I want to play you
23 something from July 5th, 2015.

24 MR. BANKSTON: Can you play me the clip
25 called Ambulance?

1 Q. (BY MR. BANKSTON) These are two things that
2 you and Mr. Dew --

3 (Video playing.)

4 Q. (BY MR. BANKSTON) Mr. Jones, if you saw
5 ambulances parked next to that building, you knew it
6 wasn't the school, didn't you?

7 MR. BARNES: Objection as to form.

8 A. No, I didn't. And later I corrected, before I
9 was ever sued that that was one of the things that had
10 been said that wasn't true was that they were at the
11 firehouse. There was other footage, too, from the
12 school. So it's all edited. So it's hard to respond to
13 this. I want to respond to your questions. It's so
14 edited, like, two- or three-second clips sandwiched in
15 with others. It looks like more than three broadcasts.

16 Q. (BY MR. BANKSTON) Well, let's look right
17 there. That was just two things, something you said,
18 something Mr. Dew said.

19 A. Yeah, I --

20 Q. Hold on. Ambulances are parked down the road;
21 they didn't even go to the school. Then a year later,
22 you showed your audience a video of a building with an
23 ambulance to it; and you told them it was the school?

24 A. I talk four hours a day, and I can't remember
25 what I talked about sometimes a week ago. Sandy Hook

1 has been, in the aggregate, less than one-tenth of
2 1 percent of what I cover. And I understand that you've
3 been living this and pouring over it constantly. I have
4 done almost no preparation for this. It's very -- it
5 gives me a headache, and I just -- you're just showing
6 me a bunch of edited tapes.

7 **Q. What question are you answering?**

8 A. You're asking me about a bunch of edited --
9 how does someone answer...

10 **Q. Mr. Jones, what question were you answering?**

11 A. If you put a bunch of pages in a blender with
12 writing on it and blended it all up and you asked me
13 what's in the blender, I can't answer you a question
14 with a bunch of blended words.

15 **Q. Mr. Jones, I'm asking you: If there's**
16 **ambulances next to the building, you know it's not the**
17 **school?**

18 MR. BARNES: Objection as to form.

19 **Q. (BY MR. BANKSTON) Correct?**

20 A. No, that's not what I meant.

21 **Q. Okay. I want to play you a piece of video**
22 **footage from the helicopter footage. Let's take a look**
23 **at that really quick.**

24 MR. BANKSTON: Can you play the
25 December 14th, 2012 Helicopter Firehouse Footage?

1 (Video playing.)

2 Q. (BY MR. BANKSTON) Mr. Jones, there are no
3 elementary aged children in this line of people walking,
4 is there?

5 A. No. It's another clip we're talking about.

6 Q. Yeah. Do you see here is where they're
7 walking in the circles? None of those people have their
8 hands up, do they?

9 A. But there is footage I've seen that shows
10 that. So you're conflating two different things.

11 Q. Really? Because you were talking about the
12 footage on your show. You're saying there's actually a
13 different piece of video footage with children with
14 their hands up being led in circles in and out of --

15 A. From my memory it's a live show, so the people
16 in there was throwing stuff up. Many times it's not
17 accurate, sure.

18 Q. So the video clip you were showing wasn't even
19 of the school?

20 MR. BARNES: Objection as to form.

21 Q. (BY MR. BANKSTON) Correct?

22 A. I'm not sure about what video this is it's so
23 edited, but I wrongly have said in the past, off of news
24 reports that I was relying on, that the children were
25 going around with their hands up at the school when it

1 was the firehouse. And that's one of the main anomalies
2 that ended up to not be true and the reason I changed my
3 mind about a lot of things.

4 **Q. Sure. After 2017, right?**

5 A. Well, I've gone back when I've been asked
6 about anomalies and I've repeated those anomalies and
7 those tapes have been edited and that's why I do not do
8 interviews now and talk about the anomalies, because
9 those are edited.

10 **Q. Right. Let's talk about the school itself. I**
11 **want to show you two comments that you made on July 7th,**
12 **2015 and April 22nd, 2017.**

13 MR. BANKSTON: Can you play The School
14 was Closed?

15 (Video playing.)

16 **Q (BY MR. BANKSTON) The first thing, you admit**
17 **now there are no e-mails between City Council and the**
18 **School in which Sandy Hook was being shut down; that's**
19 **not a real thing?**

20 MR. BARNES: Objection as to form.

21 A. This is almost seven years old, but I do
22 believe that we wouldn't -- I mean, sometimes we're
23 wrong about things; but there's always some news we're
24 covering or a witness or something. So I can't answer
25 that because of just memory.

1 Q. (BY MR. BANKSTON) Mr. Jones, you said it was
2 seven years ago?

3 A. Six years ago, whatever it was.

4 Q. You just -- that stuff we just played you was
5 April 22nd, 2017. That was a year before you were sued,
6 right?

7 A. It was 3 seconds long.

8 Q. Right. But it's not seven years ago, is it,
9 Mr. Jones? You were saying that a year before you were
10 sued.

11 MR. BARNES: Objection as to form.

12 A. I can't answer. It's out of context. I don't
13 know what you're showing me.

14 MR. BANKSTON: Of course. Objection,
15 nonresponsive.

16 Q. (BY MR. BANKSTON) When you said in the video
17 it's all rotting and falling apart, we'd talked earlier,
18 you'd seen the interior video of Sandy Hook; that's
19 something you'd seen before?

20 A. The photos of the mold and the rotting doors.

21 Q. And you said on the video it was falling
22 apart. You just said that on the video?

23 MR. BARNES: Objection as to form.

24 Q. (BY MR. BANKSTON) Right?

25 A. I saw the edited video. I don't know where

1 it's from. I don't know the context.

2 Q. Sure. But you said in this video, in the
3 video, the school's rotting and all falling apart and
4 nobody's even in it.

5 MR. BARNES: Objection --

6 Q. (BY MR. BANKSTON) Right? That's what you
7 said?

8 MR. BARNES: Objection as to form.

9 A. I have no idea what the context of this is.

10 Q (BY MR. BANKSTON) So wait. There's a context
11 in which saying in the video that the school was all
12 rotting and falling apart and nobody's even in it --

13 A. Why are these videos all 3 seconds long?

14 Q. Because I'm focusing in on specific issues,
15 Mr. Jones. And I want to know: This claim you made
16 that there is a video of the school where's it's
17 rotting and falling apart -- that's all I care about
18 right now -- you saw such a video?

19 MR. BARNES: Objection as to form.

20 A. I have seen, from memory, news reports showing
21 photos and images. And my memory fails, but I do
22 remember seeing photos put to video of the school being
23 in disrepair in the reports.

24 Q. (BY MR. BANKSTON) Let's play for you really
25 quick -- I want to show you this video, the interior

1 video of Sandy Hook that was taken that day. I want to
2 show you a clip from that, and I want you to note that
3 every time they're going to go -- there's a couple of
4 times they're going to go in the hallway; and there's
5 part of the hallway they go in that has to be redacted
6 because that's where Ms. Hochsprung and Ms. Sherlock's
7 blood is all over that hallway. But I want you to take
8 a look at the hallways and the classrooms for me as you
9 watch this video.

10 MR. BANKSTON: Can you play Interior of
11 Sandy Hook?

12 (Video playing.)

13 Q (BY MR. BANKSTON) Mr. Jones, that school is
14 not rotting, falling apart, or abandoned, is it?

15 MR. BARNES: Objection as to form. I
16 assume that includes any authentication disputes that I
17 have about whether something is --

18 MR. BANKSTON: Under the Texas Rules
19 every bit of evidence that is offered in deposition is
20 not -- there's no waiver of any objections.

21 Q. (BY MR. BANKSTON) That video's not rotting --
22 that school's not rotting and falling apart and it's not
23 abandoned, is it, Mr. Jones?

24 A. I've never seen that video.

25 Q. I'm perfectly confident you haven't.

1 Absolutely, I know that. But what I'm asking you --

2 A. I don't even know --

3 Q. -- is seeing it right now, what I just showed
4 you, regardless of what school it was or if I just went
5 and took it over at Eastside Elementary, that school
6 that you just saw on the screen is not rotting, is not
7 falling apart, and does not look to be abandoned, does
8 it?

9 A. It looks dilapidated.

10 Q. Okay, Mr. Jones. You've seen Mr. Zipp's
11 affidavit, correct?

12 A. Mr. Zipp?

13 Q. Mr. Zipp, Fred Zipp, Plaintiff's expert who's
14 sitting with us in the room today, you've seen his
15 affidavit in this case?

16 A. No.

17 Q. Okay. So you didn't know that there were 180
18 news articles from 2009 to 2011 about the Sandy Hook
19 school with photos of the children doing things from
20 multiple sources; that's not something you've ever
21 known?

22 A. I didn't know that number. I mean, I've seen
23 photos and things showing mold and the place dirty and
24 messed up if that's what you're talking about.

25 Q. No. I asking you that the school was open

1 during those years, right? During 2009 to 2011 there's
2 plenty of evidence the school was open, right?

3 A. There's been controversy, like, on Google,
4 showing their deliveries and things like that. I mean,
5 that was controversy we covered.

6 Q. Okay. So based on what you knew at the time,
7 you entertained serious doubts about whether the school
8 was open?

9 MR. BARNES: Objection as to form.

10 Q. (BY MR. BANKSTON) In other words -- let me
11 pull that back, Mr. Jones.

12 A. I had said stuff about Jussie Smollett.

13 Q. Sure. Okay.

14 A. I was the first person to question it.

15 Q. Sure. And I'm not going to try to pin you
16 down on here. Let's just be straight up and upfront
17 about it. You didn't know one way or the other, right,
18 whether the school was open? You had some doubts. You
19 didn't know one way or another; you couldn't confirm it
20 one way or another?

21 A. I know that some investigators who were
22 accredited school safety folks who thought were
23 credible experts were the ones -- professors and others
24 that were in good standing -- were the ones that were
25 really doing these investigations; and that I was in

1 some cases taking what they said incorrectly. And I've
2 admitted to that.

3 Q. And with no corroboration? You just take what
4 they said and you trusted these guys, right?

5 A. I mean, I'd seen one of the guys, like, on
6 national television before on the Columbine stuff as a
7 national safety expert; and he sounded pretty credible.

8 Q. Mr. Halbig, right?

9 A. Yes.

10 Q. And he had sent you something in the
11 neighborhood of -- ten fours -- 4,000 e-mails?

12 A. It's a lot, yeah.

13 Q. And looking at those e-mails, taking a look at
14 them, you wouldn't agree with me that that man is a
15 raving lunatic?

16 A. He seemed very credible and put together
17 earlier on, but -- I can't remember the exact number --
18 he seemed to get agitated about four years ago, three
19 years ago.

20 Q. Let's talk a little bit about EMTs, emergency
21 medical technicians; and I want to show you a clip of
22 something that you said. And this, to address
23 Mr. Enoch, is I think where this got messed up. There's
24 a clip, again, on June 13, '27 [sic.] right before the
25 Megyn Kelly interview. In other words, the Megyn Kelly

1 interview's coming up; and let's just be upfront about
2 it. It was edited, and you didn't think that was fair,
3 right? I mean, it was pretty heavily edited?

4 A. I think they call it deceptively jump titles.
5 I mean, your videos are worse; but sure. Sure.

6 Q. Yeah, I get that. I get that.

7 Let's take a look at something you said
8 right before the Megyn Kelly interview. Okay? And this
9 is on June 13th, 2017.

10 MR. BANKSTON: Will you play the clip
11 called EMTs?

12 (Video playing.)

13 Q. (BY MR. BANKSTON) How did you determine that?

14 MR. BARNES: Objection as to form.

15 A. I was reading someone else's report.

16 MR. BANKSTON: Okay. Hold on.

17 Bring up the last frame again.

18 Q. (BY MR. BANKSTON) Mr. Jones, I'm going to
19 lean up here so I can kind of point a little bit. Do
20 you see here where it says, "What Alex Jones really
21 believes about Sandy Hook?"

22 A. Yes, I do.

23 Q. Do you see where it says, "Among his
24 questions?" Do you see that?

25 A. Yes.

1 Q. Do you see it says, "In closing Jones
2 says..."?

3 A. I believe that's where I'm saying I think
4 Sandy Hook happened.

5 Q. Right. What I'm asking you is: When it's
6 talking "his questions," that's Zero Hedge reporting on
7 your questions. And when it says, "In closing Jones
8 says," that's Zero Hedge reporting on what you said.

9 And now, in some sort of inception, this
10 is you reporting on Zero Hedge reporting on what you
11 said?

12 A. Can you make it bigger? I can't read that.

13 Q. I cannot make that bigger, Mr. Jones; but I'm
14 asking --

15 THE WITNESS: May I approach it, your
16 Honor?

17 MR. BANKSTON: You may approach it.
18 Yeah, go ahead.

19 THE WITNESS: I can't even see it. My
20 god. There's no way to blow it up maybe?

21 MR. BANKSTON: I don't think I can blow
22 that up.

23 A. "My heart goes out to the" -- I can't read it.
24 "My heart goes out to the parents of lost children."

25 Q. (BY MR. BANKSTON) Okay. That's great. What

1 I'm asking you, Mr. Jones, is: Do you see the word
2 "his"?

3 A. Yes.

4 Q. Who does "his" refer to?

5 A. I believe it refers to me.

6 Q. Okay.

7 MR. BANKSTON: You can take a seat,
8 Mr. Jones.

9 Q. (BY MR. BANKSTON) So how did you come to the
10 conclusion that they never let paramedics or EMTs in the
11 building?

12 MR. BARNES: Objection as to form.

13 A. I went off of the professors and all the
14 so-called experts.

15 Q. (BY MR. BANKSTON) Okay.

16 A. And they wouldn't release a bunch of the
17 reports. There were a bunch of lawsuits about the
18 secrecy, which added to all of the -- and as more of the
19 stuff got released, then it proved the official story.

20 Q. When do you think that the police reports on
21 Sandy Hook were released? When do you think that
22 happened?

23 A. I know there was one report -- you know, I
24 don't know the date, so I don't want to be inaccurate.

25 Q. Okay.

1 A. I believe one took over five years.

2 Q. Okay. Well, let me show you one that didn't
3 take five years. Okay? We're going to talk about one
4 of those, and I'm going to mark it for you right now as
5 Exhibit 2.

6 MR. BANKSTON: We're actually going to
7 the videos after the sequence. I think that's going to
8 be lot easier.

9 (Exhibit 2 marked.)

10 Q. (BY MR. BANKSTON) Mr. Jones, I have handed
11 you a State of Connecticut Department of Public Safety
12 Investigation Report. Do you see that at the top?

13 A. Uh-huh.

14 Q. Okay. And you see kind of in the middle
15 there, "Place of Interview: Newtown Police Department,"
16 right in the middle of the interview report?

17 A. I need to read this.

18 Q. In fact, you know what, just to be fair to you
19 about this, it's a long report, right? I mean, it's
20 five, six pages? Let's let you read the whole thing.
21 Don't you think that'd be fair?

22 A. Sure.

23 MR. BANKSTON: In fact, let's go off the
24 record. We'll take a little break.

25 THE WITNESS: Well, I mean --

1 MR. BANKSTON: You can sit there and read
2 that. Does that sound good?

3 THE WITNESS: Well, I may need to -- if
4 we're taking a break, I'm going to go to the bathroom
5 and stuff.

6 MR. BANKSTON: Sure, you can go to the
7 bathroom. I'm not going to stop you from that,
8 Mr. Jones. I'm not -- your bodily functions are your
9 own.

10 Let's go ahead and go off the record.

11 THE VIDEOGRAPHER: We're off the record
12 at 12:44 p.m.

13 (Off the record from 12:44 to 12:58 p.m.)

14 THE VIDEOGRAPHER: We are back on the
15 record at 12:58 p.m.

16 Q (BY MR. BANKSTON) Mr. Jones, before we went
17 on a break we were talking about the issue of whether
18 there were EMTs allowed into the building, and I
19 provided you with a couple of findings of some police
20 reports. I have put in front of you Exhibit 2, the
21 statement of Lieutenant Vanghele, correct? You've had a
22 chance to read that?

23 A. Vanghele. I did read most of it, but I didn't
24 get to the second one.

25 Q. Oh, okay. Well, let's look at Exhibit 2. You

1 have Exhibit 2 in your hand?

2 A. I'm on 2.

3 Q. Let's go to page 5. Do you see the
4 highlighted portion?

5 A. Yes.

6 Q. I'm going to read that, and you're going to
7 follow along with me. Okay? "I then walked into a room
8 with Sergeant Carrio. At first glance it did not appear
9 there were any casualties. To the left of the room as
10 you walk in, there was a bathroom in the corner. There
11 was a massive pileup of bodies in this room. At this
12 time I did not know it was a bathroom and I wondered how
13 the suspect had the time to kill that many people and
14 stack them in the corner of the room. Sergeant Carrio
15 stated he was an EMT or maybe a paramedic and that he
16 had to check to see if anyone in the pile might have
17 survived -- may have survived. I agreed as the bodies
18 were stacked two and three high and that some of the
19 children at the bottom, who were able to cram in first,
20 may have escaped bullets.

21 "He began to check for life signs,
22 wounds, and attempts to find a pulse. The victims on
23 the top of the pile" -- redacted -- "and many of the
24 bodies had injuries that were obviously fatal. It
25 appeared as if the teachers in the room immediately upon

1 hearing gunshots began to pack children into the
2 bathroom. The children that were sitting on the floor
3 of the bathroom were packed in like sardines. One
4 little girl was sitting, crouched in between the toilet
5 seat and the back corner of the room. I thought that
6 she might have the best chance for survival. As
7 Sergeant Carrio got to the last bodies, it was clear
8 that no one had survived."

9 You've never heard of Sergeant Carrio,
10 have you?

11 A. I haven't.

12 Q. And you didn't know what he did in the
13 building that day?

14 MR. BARNES: Objection as to form for the
15 time.

16 Q. (BY MR. BANKSTON) You can answer. You didn't
17 know what he did in the building?

18 A. (No audible response.)

19 Q. Correct, Mr. Jones?

20 A. It's, again, over seven years. I don't
21 remember a lot of this stuff.

22 Q. Okay. So either you didn't know what he did
23 in the building, or you did know what he did in the
24 building. One of those two things has to be true,
25 right?

1 A. I think I do know now.

2 Q. Sure.

3 A. It's just there's so much. It all becomes a
4 big paste.

5 Q. So we can agree that in 2017, when you raised
6 the question, "Why were no paramedics let in the
7 building," you either did know what Sergeant Carrio did
8 or you didn't know what Sergeant Carrio did. One of
9 those two things has to be true, obviously, right?

10 MR. BARNES: Objection as to form.

11 A. The tape was so edited, I don't remember.

12 (Exhibit 3 marked.)

13 Q (BY MR. BANKSTON) Okay. Let's look at
14 Exhibit 3. Do you want to pull Exhibit 3 for me? Can
15 you go to the final page, just flip it on its back, onto
16 the back. Do you see at the very bottom of the page,
17 the very bottom of the left corner it says
18 Sergeant William F. Carrio?

19 A. Yes.

20 Q. Okay. I'm going to read the highlighted part
21 to you. "Paramedic Matt Cassavechia approached me. I
22 had known Cassavechia for many years and recognized him
23 as the head of EMS for Danbury Hospital. Cassavechia
24 asked how long it would be until he could get into the
25 building. I told him the building was not yet secured,

1 that all the injured were out, and that numerous dead
2 persons remained in the school. Cassavechia said, 'You
3 know I've got to get into that building.' I realized at
4 some point those victims presumed dead would have to be
5 officially pronounced dead. We also needed to impact
6 the fewest number of EMS personnel that we needed
7 preserve the integrity of the scene. Looking around I
8 recognized two other senior paramedics that I believed
9 had the experience and training to handle the situation
10 tactically. I told Cassavechia I would bring myself
11 [sic], Paramedic Bernie Meehan, and Paramedic John Reed
12 into the front of the school, which was secured by that
13 point. They were told to bring minimal equipment. As
14 we walked to the school, I tried to prepare them for
15 what they were about to see. I told them the number of
16 the victims and the nature of the wounds. I told
17 Cassavechia, 'This will be the worst day of your life?'"

18 You have never heard of Matt Cassavechia,
19 Bernie Meehan, or John Reed, have you, Mr. Jones?

20 A. I mean, I just read their names.

21 Q. Prior to me putting that sheet of paper in
22 front of you, you've never heard of those gentlemen,
23 have you?

24 A. I can't say that. It's too much -- too much
25 information.

1 Q. In fact, it's possible when you said that
2 paramedics weren't let into the building, you knew those
3 three gentlemen and you knew they had been in the
4 building; that's possible, true?

5 A. I wouldn't consciously do that.

6 Q. If -- those reports sitting right there, if
7 those reports were available and online and had been
8 discussed by InfoWars as early as 2013, if that's
9 something that was public, you would agree with me that
10 saying no paramedics went into the building is reckless,
11 correct?

12 MR. BARNES: Objection as to form.

13 A. I just don't know what you're talking about
14 off a 3-second video and this.

15 Q. (BY MR. BANKSTON) You're not going to dispute
16 with me that you've repeatedly said on your television
17 show -- or your web broadcast that paramedics weren't
18 allowed in the building; you've said that over and over
19 and over, right, Mr. Jones?

20 MR. BARNES: Objection as to the form.

21 Q. (BY MR. BANKSTON) Right?

22 A. It's edited the way you -- what you've shown
23 me, so I can't comment.

24 Q. I'm not talking about what I -- what was on
25 the video. I'm not talking about that. Ignore what you

1 just saw on the video. I'm asking you -- me and you
2 right now -- you've said repeatedly on your web show
3 paramedics weren't allowed inside of Sandy Hook? You've
4 said that; you're not going to deny that?

5 A. I've read other people's reports saying.

6 Q. Okay. And you did nothing to confirm those
7 reports, literally nothing?

8 A. I went out and I covered news that was being
9 covered.

10 Q. How did you confirm the reports that you were
11 given that paramedics weren't allowed in the building?
12 How did you confirm --

13 A. We generally go through the reports, and then
14 we look at what they link to. And I don't have all the
15 dates, but one report took over five years; another,
16 three years; another, a year. And so it's all -- I
17 mean, again, this has not been a large part of what I've
18 covered. Sandy Hook has been a very -- not even one-
19 tenth of 1 percent of what we cover and I know that you
20 think that that's the case, but that's not the case.

21 MR. BANKSTON: Objection to the
22 nonresponsive portion.

23 Q. (BY MR. BANKSTON) Hearing that your murdered
24 child received no medical attention, that's obviously
25 distressing?

1 MR. BARNES: Objection as to the form.

2 Q. (BY MR. BANKSTON) Right, Mr. Jones?

3 A. (No audible response.)

4 Q. Can you -- let's do it this way --

5 Withdraw the question.

6 Can you imagine a universe where hearing
7 that your murdered child received no medical attention
8 is not distressing?

9 MR. BARNES: Objection as to the form.

10 A. I think there were even lawsuits by the
11 parents saying things weren't done right sometimes, and
12 that's a terrible thing.

13 Q. (BY MR. BANKSTON) That's not my question,
14 though, is it, Mr. Jones?

15 A. Oh.

16 Q. Is it? That's not my question.

17 So my question is: If you heard your
18 murdered child received no medical care, that's
19 distressing?

20 MR. BARNES: Objection as to form.

21 A. It is distressing. That's why I was
22 distressed just in general hearing those reports.

23 Q. (BY MR. BANKSTON) Wait. When you say you
24 were distressed hearing those reports, what reports are
25 you talking about? What reports?

1 A. Those -- I mean, this is over -- that was
2 seven years ago.

3 Q. You know this is the one day you were to come
4 down here and testify about Sandy Hook, and are you
5 going to tell me you haven't done anything to try to
6 figure out what happened in those seven years?

7 MR. BARNES: Objection as to form.

8 Q. (BY MR. BANKSTON) Is that what you're saying,
9 you walked in here totally unprepared, just winging it
10 today?

11 MR. BARNES: Objection as to form.

12 A. I don't know how to respond to that.

13 Q. (BY MR. BANKSTON) Do you have the respect
14 enough for these parents in this lawsuit to actually go
15 back and try to find out what happened? Did you do
16 that?

17 MR. BARNES: Objection as to form.

18 A. I covered it when it first happened. And you
19 can look at six shows a week, three to four hours a day
20 and find spots and edit them and things. It's the
21 media's claim that my life is about Sandy Hook, and it's
22 not even one of the major issues I've ever covered. And
23 so you're asking me to do the impossible, to go back
24 through a whole compendium and then give some
25 quantifiable statement to you off 3-second edited

1 videos. It's like -- it's square pegs in round holes.

2 MR. BANKSTON: Objection to the
3 nonresponsive portion.

4 Q. (BY MR. BANKSTON) I want to talk to you about
5 death certificates. I want to play you a clip of
6 something you and Mr. Dew said February 12th, 2015 and
7 November 18, 2016.

8 MR. BANKSTON: Can you play School and
9 Death Certificates for me?

10 (Video playing.)

11 Q (BY MR. BANKSTON) What did you do to confirm
12 that?

13 MR. BARNES: Objection as to form.

14 A. Again, these are highly edited, spliced tapes.
15 The audio's been altered. I don't even know what
16 context this is in.

17 Q. (BY MR. BANKSTON) Sir, the context is Sandy
18 Hook death certificates are sealed; and you said that.
19 What did you do to confirm it, Mr. Jones?

20 MR. BARNES: Objection as to form. It
21 misstates the evidence.

22 MR. BANKSTON: You don't have to do
23 speaking objections, Mr. Barnes.

24 MR. BARNES: This is one of the worst
25 depositions I've ever witnessed.

1 MR. BANKSTON: That's fine. You can make
2 your objections. Go make all the objections you want,
3 but make them in accordance with the Texas Rules which
4 you agreed to be bound with before you --

5 MR. BARNES: I am. Okay. Fine, fine.

6 Q. (BY MR. BANKSTON) Mr. Jones, sealing the
7 death certificates, the fact that they were sealed,
8 something you and Mr. Dew both said, how did you confirm
9 that?

10 MR. BARNES: Objection as to form.

11 A. I don't want to answer these things
12 incorrectly. So my memory is -- I remember that this
13 thing was the most sealed case ever and that it was in
14 the news, that there were all these lawsuits about
15 unsealing things and that the records and the redacted
16 police reports -- like what you gave me is almost all
17 blacked out -- this is what people were talking about.
18 And so I can't accurately answer off of edited tapes.
19 I've never seen anything like that. So I'm trying to
20 answer your questions.

21 Q. You never -- have you ever tried to order a
22 death certificate? They're \$20. Anybody can get any
23 one of them. Did you ever try?

24 A. As I told you, we went off news reports and
25 other people that were investigating. We did not

1 ourselves investigate Sandy Hook.

2 Q. Thank you, Mr. Jones.

3 I want to talk to you about something you
4 said about Port-A-Potties. You know what I'm talking
5 about when I talk about Port-A-Potties, right?
6 Port-A-Potties showed up to Sandy Hook?

7 A. Port-A-Potties?

8 Q. Yeah. Do you know what I'm talking about when
9 I say that allegation, when you talked about on your
10 show Port-A-Potties showing up to Sandy Hook? Do you
11 remember talking about Port-A-Potties?

12 A. I do remember talking about them.

13 Q. Okay. And you remember how your point was
14 they showed up within an hour for a big media event,
15 showed that it was clearly -- something's going on
16 because they showed up way too quick?

17 MR. BARNES: Objection as to form.

18 Q. (BY MR. BANKSTON) Correct?

19 A. I was reporting on what other people had
20 reported.

21 Q. Okay. Let me play you a clip of something
22 that you said on July 7th, 2015 and April 22nd, 2017.

23 MR. BANKSTON: Could you play
24 Port-A-Potties for me?

25 (Video playing.)

1 Q. (BY MR. BANKSTON) That's consistent with what
2 we were just talking about, right --

3 MR. BARNES: Objection --

4 Q. -- Port-A-Potties showing up an hour before a
5 big media event?

6 MR. BARNES: Objection as to form.

7 Q. (BY MR. BANKSTON) Correct, Mr. Jones?

8 A. Yes. I mean, I did talk about that on some of
9 your edited tape. I don't know the context.

10 Q. Sure.

11 (Exhibit 4 marked.)

12 Q. (BY MR. BANKSTON) Mr. Jones, I'm going to
13 hand you a copy of what I have marked as Exhibit 4.
14 Have you ever seen that before?

15 A. I don't remember.

16 Q. You're not sure if you've seen this before?

17 A. No.

18 Q. Okay. You'll see at the top it has a time
19 stamp 12-14-12?

20 A. Yes.

21 Q. You know that's the date of Sandy Hook, right?

22 A. I don't know.

23 Q. You don't know that?

24 A. Was that the day?

25 Q. It is.

1 A. Okay.

2 Q. It is, Mr. Jones.

3 We had talked earlier about the dash cam
4 videos and the official report and if there's police
5 cars sitting out in front of Sandy Hook with their dash
6 cams on, it would be a pretty simple matter of just
7 going to video and scrolling through to see when various
8 stuff arrives. That's something you can do, right?

9 A. I would imagine, yeah.

10 Q. Yeah. InfoWars didn't do that, did they?

11 A. I can't say that. I don't know what we did.

12 Q. Okay. Well, if InfoWars did do that, they
13 would have come across this picture of Port-A-Potties
14 showing up at 1:30 p.m., right? That's what that time
15 is right there? Are you familiar with military time?

16 A. Uh-huh.

17 Q. Okay. And that's 1:30, right?

18 A. Uh-huh.

19 Q. Right. So that's not an hour after the
20 shooting, is it, Mr. Jones? Correct?

21 A. It's pretty darn soon after.

22 Q. Is it? Is it maybe more like four hours
23 after?

24 A. Again, I was going off of what I believed to
25 be -- and he was -- an accredited national school

1 safety person who'd been on national television programs
2 as an expert. I was going off what Halbig was saying.

3 Q. You did no confirmation whatsoever of
4 Mr. Halbig's statements about the Port-A-Potties, did
5 you?

6 A. I don't believe these videos --

7 MR. BARNES: Objection as to form.

8 A. -- were released for a long time.

9 Q. (BY MR. BANKSTON) If they were, if those
10 videos were released in 2013, it certainly would have
11 been reckless to say the Port-A-Potties arrived in an
12 hour in 2017, wouldn't it, Mr. Jones?

13 MR. BARNES: Objection as to form.

14 A. I just don't know how to respond to the fact
15 that -- that how do we know more weren't arriving later
16 and that there's other Port-A-Potties or whatever? I'm
17 not saying that's what happened. You just showed me one
18 still off something and tell me to answer questions.

19 Q. (BY MR. BANKSTON) Yeah. So one thing you
20 could do is go back into the dash cam video and scroll
21 through and find out if something did arrive earlier?
22 That's something you could do, right?

23 MR. BARNES: Objection as to form.

24 Q. (BY MR. BANKSTON) It's not hidden
25 information, right?

1 MR. BARNES: Objection as to form.

2 Q. (BY MR. BANKSTON) Correct?

3 A. I guess correct.

4 Q. Okay. Thank you, Mr. Jones.

5 Mr. Jones, I've noticed on a lot of these
6 answers you've said, "Well, I'm just going off what
7 Mr. Halbig said." So what I want to know is: When you
8 talked earlier about you did deep research, what was
9 that? What deep research did you do?

10 A. Well, I mean, I did look at the news articles
11 saying they were being very secretive about the case,
12 that a lot of things were sealed, which is unusual.
13 There were lawsuits involved with that, and I did do
14 research on Bloomberg putting out an e-mail the day
15 before saying, "Get ready. There's going to be a big
16 event," you know, just straight up, people waiting
17 around for mass shootings or whatever. And just the way
18 the media made a spectacle out of it right away is what
19 really made me question. That scene like with the WMDs
20 or babies in the incubators, I just saw the media so on
21 it, so ready; and I thought that added credibility to
22 it.

23 Q. Okay. I mean, I'm glad you brought up the
24 Bloomberg thing. I remember there was a couple of
25 episodes where you talked about this Bloomberg e-mail

1 and you said to your audience that there was an e-mail
2 that came out in the lawsuit where Bloomberg told his
3 people: Get ready in the next 24 hours to capitalize on
4 a mass shooting.

5 That didn't happen; that's not a real
6 e-mail, is it?

7 MR. BARNES: Objection as to form.

8 A. I mean, I don't think it's exactly that; but
9 there's one similar to that.

10 Q (BY MR. BANKSTON) Yeah. I mean, what you
11 said is not real?

12 MR. BARNES: Objection as to form.

13 Q. (BY MR. BANKSTON) Bloomberg never told his
14 people: Get ready in the next 24 hours to capitalize on
15 a mass shooting; that did not happen?

16 MR. BARNES: Objection as to form.

17 A. What does his gun organization do?

18 MR. BANKSTON: Okay, Mr. Jones.

19 THE REPORTER: I'm sorry. Could you
20 repeat the answer?

21 THE WITNESS: I believe his anti-gun
22 organization said: Get ready. Get ready to move quick,
23 you know. I don't have it in front of me. It's from
24 years ago.

25 Q (BY MR. BANKSTON) Let's -- I want to ask you

1 about photos of the children, so I'm going to play you a
2 video clip of something you said about the photos of the
3 children. This is something you said on September 25th,
4 2014.

5 MR. BANKSTON: Can you play Photos of
6 Children?

7 (Video playing.)

8 Q. (BY MR. BANKSTON) Mr. Jones, you can admit
9 that that statement was absolutely nonsense; there are
10 not photos of children who died who are actually still
11 alive?

12 A. That is and out-of-context clip. I can't even
13 respond to something like that.

14 Q. You said it, though, didn't you?

15 A. I don't know what it's in context with.

16 Q. Is there a good context to that, Mr. Jones,
17 that people's children who are dead, there's actually
18 photos of them still alive? Can you give me the good
19 context?

20 A. There is no way --

21 MR. BARNES: Objection as to form.

22 A. There's no way to respond to -- I mean, I
23 don't know what it is.

24 Q. (BY MR. BANKSTON) I know what it is. It's a
25 video of you saying that there are photos of children

1 **who died who are still alive. And I'm asking you:**

2 **That's absolute nonsense, isn't it, Mr. Jones?**

3 MR. BARNES: Objection as to form.

4 A. No, it's -- no, it's not. I don't know the
5 context of that video.

6 **Q. (BY MR. BANKSTON) Okay.**

7 A. Okay? There have been cases where the
8 Associated Press major groups ran pictures of Sandy
9 Hook children in Pakistan after a mass bombing; and in
10 the lineup of dead kids -- or parents about their dead
11 kids -- because I believe a bombing happened in
12 Pakistan -- bizarrely, they've got a Sandy Hook kid in
13 there, admitted. And then we've seen other cases. It's
14 very bizarre and that's where people call in and ask and
15 then I respond to it. And I don't know if that's even
16 that clip because it's a couple of seconds long.

17 **Q. Yeah, well, clearly, it's not the kid in**
18 **Pakistan because that's not a kid who's still alive,**
19 **right? When Noah Pozner's picture appeared in Pakistan,**
20 **that's not Noah Pozner's still alive, right?**

21 MR. BARNES: Objection as to form.

22 **Q. (BY MR. BANKSTON) Correct?**

23 A. I wasn't saying Noah Pozner's still alive.

24 **Q. Okay. It was widely reported during your**
25 **divorce that your attorney said to the judge that you're**

1 playing a character, that you're a performance artist.
2 So I want to ask you -- I want to know: When you were
3 making these claims about Sandy Hook, were you being a
4 journalist; or was this all performance art?

5 MR. BARNES: Objection as to form.

6 A. When I say things on air, I believe it. I
7 had -- when I made a radio talk show host. That was my
8 ex-wife trying to enter into evidence, like ten years
9 ago, me in a Joker outfit doing a satire piece about
10 chemicals in the water; and she was trying to say that I
11 was crazy and was really the Joker.

12 And we said, "No. When Jack Nicholson
13 plays the Joker, your Honor, he's not really the Joker.
14 He's playing a part."

15 And then the media ran with it, saying
16 that I said that what I regularly do on air is
17 entertainment.

18 So it's very clear when I'm being serious
19 on air; and it's very clear if I'm wearing a Gorn mask,
20 you know, and reenacting Star Trek as a joke, that I'm
21 not literally believing that the Gorn's a real lizard
22 creature. I was making fun of the media in that case
23 for saying that -- you know, saying that I believe the
24 Government's talking about lizards. That's on me.

25 Q. Sure.

1 A. And so I wore a lizard mask. They also tried
2 to introduce that. And we explained that, "No, your
3 Honor" -- the judge agreed, yes, we understand satire
4 versus reality.

5 So, no, I was -- I believe what I say on
6 air. Now, when I cover what somebody else is covering
7 or I have a war game, I look on both sides of something,
8 that doesn't mean that I believe in both sides of what
9 I'm covering. It means I'm looking at the different
10 angles, and then that's taken out of context.

11 **Q. Well, what I'm getting at is: This stuff**
12 **we're looking at today, kids going in circles, the**
13 **school was closed, e-mails, EMTs not in the building,**
14 **Port-A-Potties, these aren't comedy skits; this is**
15 **journalism?**

16 A. Yes -- well, this is punditry because I wear a
17 journalist hat, a punditry hat, satire hat, you know,
18 just reading news. I mean, just being a news reader, I
19 mean, I do that as well. So I do a lot of things; but
20 when I was covering Sandy Hook, I was genuinely trying
21 to get to the truth of it.

22 **Q. Okay. At InfoWars it was known from the very**
23 **start that parents were being harassed by believers in**
24 **the Sandy Hook Conspiracy? You would agree to that,**
25 **right?**

1 A. No.

2 MR. BARNES: Objection as to form.

3 Q. (BY MR. BANKSTON) Well, you would also at
4 least agree that -- because of the potential for that
5 harassment, you would agree with me that InfoWars needed
6 to treat Sandy Hook allegations with extreme caution,
7 given it was a traumatic event; you'd agree with that?

8 MR. BARNES: Objection as to form.

9 A. I mean, I think it's the American birthright
10 and it's important when you have big events, whether
11 they're wars or WMDs or mass shootings, that -- I mean,
12 I think the right to question is an absolute right.

13 Just like the Jussie Smollett situation,
14 I took a risk saying I thought that was fake and I was
15 the first person to question it and I was proven right.
16 So I just really -- I questioned Jussie Smollett from a
17 position of looking at the facts; and if I had been
18 proven wrong, then I would have, you know, apologized
19 for it. I mean, that's what I do.

20 Q. (BY MR. BANKSTON) Okay. But with Sandy Hook,
21 not with Jussie Smollett, with Sandy Hook, you would
22 agree with me you were under an obligation, InfoWars,
23 you needed to treat this with extreme caution --

24 MR. BARNES: Objection --

25 Q. (BY MR. BANKSTON) -- agreed or not agreed?

1 MR. BARNES: Objection as to form.

2 A. Well, I mean, we always covered things from
3 the perspective of caution. We were covering other
4 people's reports and also questioning the historical
5 fact that, you know, things like Operation Northwoods,
6 the Government planned to stage mass shootings in the
7 U.S.; but Kennedy said no to the plan. But the Chairman
8 of the Joint Chiefs had green-lighted it. And so
9 because of things like that, we are forced to then
10 question these events. And I think that's -- you know,
11 it's just part of the process in this country.

12 Q. (BY MR. BANKSTON) Okay. So that's part of
13 the process; and to be fair to you, InfoWars didn't know
14 from the very start that Sandy Hook parents were being
15 harassed?

16 A. No, we didn't know, not from the very start.

17 MR. BANKSTON: Can you --

18 Q. (BY MR. BANKSTON) I want to play something --
19 I want to play a clip from the InfoWars episode on
20 January 18, 2013. Okay?

21 MR. BANKSTON: Can you play the clip
22 Extreme Caution?

23 (Video playing.)

24 Q (BY MR. BANKSTON) That clip is Mr. Paul
25 Watson, who is your chief reporter at InfoWars, right?

1 A. He is now.

2 **Q. And he frequently warned you about what you**
3 **were saying about Sandy Hook?**

4 A. Well, I mean, we had discussions about it,
5 yes. We're not running a cult. We have different
6 views.

7 **Q. Right. For instance, one of the gentlemen in**
8 **the room with us right now, Rob Dew, Mr. Watson**
9 **disagreed with Mr. Dew and said, "Mr. Dew's wrong, and**
10 **you need to stop this, Mr. Jones"? That's what**
11 **Mr. Watson told you?**

12 MR. BARNES: Objection as to form.

13 **Q. (BY MR. BANKSTON) Correct?**

14 A. That there were external and internal debates,
15 as you just saw. We've looked it up. It's 90-something
16 percent of my reporting saying that it happened, even
17 going back with -- I don't do this anymore because
18 people can edit stuff -- but we would go on air and say:
19 Real shootings happen, you know, the black trench coat,
20 on the drugs, all the regular things we see in mass
21 shootings. And then we would have the other side of
22 that because the Internet didn't believe it happened.

23 **Q. Let me put it this way: Mr. Watson was right;**
24 **Mr. Dew was wrong, correct?**

25 MR. BARNES: Objection as to form.

1 A. It's not in context. I can't answer that.

2 Q (BY MR. BANKSTON) Okay. I want to play you
3 some comments you made about Mr. Watson. I want to
4 show you something you said about Mr. Watson on
5 February 12th, 2015 and on April 20th, 2018, the day
6 after you were sued.

7 MR. BANKSTON: Can you play the clip for
8 me Jones Comments on Mr. Watson?

9 (Video playing.)

10 Q (BY MR. BANKSTON) So your chief reporter was
11 right when he was warning you not to say it was phony or
12 there were crisis actors?

13 MR. BARNES: Objection as to form.

14 A. He was not the chief reporter then.

15 Q. (BY MR. BANKSTON) When did he become chief
16 reporter?

17 A. About five years ago -- well, about six --
18 well, about five years ago.

19 Q. Five years ago, 2014?

20 A. I'd have to look it up.

21 Q. Okay. So at the time you were saying that
22 clip in 2015, when you said, "He's my chief reporter,"
23 that's when he became your chief reporter?

24 A. And I said his instincts are right. So you
25 played, finally, one clip where I'm saying it happened

1 instead of editing clips.

2 Q. Well, no, I was actually talking about the one
3 before, on February 12th, 2015, you called him your
4 chief reporter.

5 A. I think I said by then he was.

6 Q. Okay. Over the years there's been some
7 tension between you and the parents after they started
8 complaining about what you were doing, correct?

9 MR. BARNES: Objection as to form.

10 MR. BANKSTON: What's your basis on that
11 one?

12 MR. BARNES: It's --

13 MR. BANKSTON: A legal objection, not a
14 speaking objection, a legal. What's your legal basis
15 for that one?

16 MR. BARNES: Okay. Well, explain the
17 legal -- it's time, date, context, definitions.

18 MR. BANKSTON: Those aren't legal
19 objections, Mr. Barnes.

20 MR. BARNES: Yes, they are because if the
21 form of the objection [sic] is misleading or leading in
22 the nature in which it --

23 MR. BANKSTON: I'm allowed to lead the
24 witness; he's adverse to me.

25 MR. BARNES: You are; but if I say -- if

1 I don't give you context of time and date...

2 MR. BANKSTON: No, that's fine. It's not
3 an objection. It's baseless.

4 MR. BARNES: Oh, yes, it is. It's a
5 basic objection. It's Lawyering 101 on how to ask
6 questions. I mean, come on.

7 MR. BANKSTON: Okay.

8 MR. BARNES: It would be easier for you
9 and for everybody if it was --

10 MR. BANKSTON: Have you got a rule of
11 evidence for me, maybe?

12 MR. BARNES: Oh, sure. It gives
13 specificity as to both date and time so that the person
14 can answer the question meaningfully. When you say --

15 MR. BANKSTON: So is that 403?

16 MR. BARNES: That could be.

17 MR. BANKSTON: That's not to form.
18 That's not -- you don't have to object to that. It's
19 preserved, Mr. Barnes.

20 Q (BY MR. BANKSTON) Let's talk about this
21 question: Over the years there started to develop
22 tension between you and the Sandy Hook parents after
23 they started complaining about what you were doing,
24 correct?

25 A. No.

1 Q. Okay. No tension.

2 You will admit, I mean, you've done
3 mocking imitations of Sandy Hook parents crying,
4 correct?

5 A. No.

6 Q. I want to play you a video clip -- two, from
7 September 24th, 2014 and November 11th, 2016.

8 MR. BANKSTON: Will you play the video
9 clip called Crying?

10 (Video playing.)

11 Q (BY MR. BANKSTON) You realize now you were
12 mocking the difficult emotional reactions of people who
13 provably lost their children?

14 A. No, I was not mocking. I was showing what
15 people were questioning. It was not to mock the
16 parents. It was showing why people were questioning.
17 It's you that is projecting mocking onto it. I was
18 showing what he did.

19 Q. When you did this stuff about the crying and
20 your imitations, this was all in service of an argument
21 that some of these parents were actors, right?

22 MR. BARNES: Objection as to form.

23 A. No.

24 MR. BANKSTON: Can you play me --

25 Q (BY MR. BANKSTON) I want to play you a clip

1 from March 14th, 2014.

2 MR. BANKSTON: Can you play me the clip
3 called Actors?

4 (Video playing.)

5 Q (BY MR. BANKSTON) Who were the actors playing
6 the different -- what are the different people where the
7 same actor was playing different parts?

8 A. I'd have to see the context.

9 Q. But that was something you believed that was
10 true?

11 A. From an edited tape I don't know what the
12 context is.

13 Q. Well, I mean, look, Mr. Jones, you can see
14 you say "actors" enough times that you and I can both
15 admit -- you can just admit right now there have been
16 multiple, repeated times where you have accused some of
17 the parents of being actors?

18 MR. BARNES: Objection as to form.

19 Q. (BY MR. BANKSTON) Right?

20 A. No, I never -- I covered the Internet, talking
21 about how people looked like actors. This is edited. I
22 can't comment on it.

23 Q Okay. So let me understand this, Mr. Jones:
24 Unless we play you a full four-hour InfoWars clip, you
25 just can't answer questions today, can you?

1 A. It's not a four-hour clip. It's that these
2 were maybe a-minute-long clips, not -- five seconds, two
3 seconds.

4 Q. Well, you're telling your audience there:
5 We've clearly got people where it's actors playing
6 different parts of different people. So you were pretty
7 certain, weren't you?

8 A. I have -- because of all the strange things
9 we've seen, there have been points in my mind where I've
10 gone back and forth in the earlier years, you know,
11 really thinking maybe the whole thing has been staged;
12 and then later, I realized it was just mainly media
13 hyping it and then trying to choreograph, you know,
14 turning it into a political situation after the case.

15 Q. Okay. Well, regardless of whatever that was,
16 this thing we just saw you say about actors, the mocking
17 imitations of crying, this is exactly the stuff that
18 Paul Joseph Watson was warning you about, correct?

19 A. No. He was saying that some of the people
20 that were out there putting stuff out, like Fetzer and
21 others in that, were not good.

22 Q. Yeah. He was really opposed to the crisis
23 actor angle, correct?

24 MR. BARNES: Objection as to form.

25 Q. (BY MR. BANKSTON) And If I get -- Mr. Jones,

1 if I get Paul Watson here to testify, he's going to tell
2 me he never believed in the crisis actor thing and
3 thought it was a bad idea to talk about crisis actors.
4 That's what he's going, isn't he?

5 MR. BARNES: Objection as to form.

6 A. Yeah, because, I mean, he legitimately is his
7 own person; and we don't tell people what to say or what
8 to do. I respect him, and we have different points of
9 view. We've had debates about Sandy Hook on air.

10 Q. (BY MR. BANKSTON) You have different views
11 about journalistic ethics, too?

12 A. Well, I mean, when there's a big Internet
13 debate that's going on and we cover that debate, I give
14 my opinion on it. That's what happens.

15 Q. Okay. As time went on, starting into 2015,
16 you learned that a Sandy Hook parent named Leonard
17 Pozner was behind a group called HONR Network, correct,
18 that was fighting online abuse of Sandy Hook victims?

19 A. I did, I think.

20 Q. And when you learned that and when HONR
21 complained to YouTube in 2015, you told your viewers
22 that HONR was run by Mr. Pozner. You showed addresses
23 being used by Mr. Pozner; and you said he needed to be
24 investigated, in Florida. Didn't you say that?

25 MR. BARNES: Objection as to form.

1 A. No.

2 Q. (BY MR. BANKSTON) Okay. Let's play a clip
3 here. I'm going to show you something that you and
4 Mr. Dew were talking about on February 12th, 2015.

5 MR. BANKSTON: Can you play Addresses for
6 me?

7 (Video playing.)

8 Q (BY MR. BANKSTON) If a person were to stake
9 out those addresses, they could wait for Mr. Pozner to
10 come pick up his mail, couldn't they?

11 MR. BARNES: Objection as to form.

12 Q. (BY MR. BANKSTON) True?

13 A. I mean, the guy's running an anti-free speech
14 foundation.

15 Q. And you're the one who outed him as doing
16 that, right? There's nothing on the HONR Network
17 website that said Mr. Pozner was running it; you outed
18 him.

19 MR. BARNES: Objection as to form.

20 A. I believe he was public on that.

21 Q. (BY MR. BANKSTON) Do you? You don't think
22 that InfoWars was the first one to break that in an
23 article? You don't think that?

24 A. That he was running a site, trying to get
25 people's websites and things taken down?

1 Q. Correct, that Mr. Pozner was running, as an
2 anonymous front, the HONR Network to help make
3 complaints against various sites so that individual
4 parents wouldn't be the subject of retribution. Yeah,
5 that's what I'm asking you if you knew.

6 A. No, I was not aware of that. We were -- I
7 believe, from memory, Dew was covering a news article
8 about how the -- but then that's been conflated by you
9 guys, sneaking into people's houses or putting out their
10 addresses to go after them; and we never did that.

11 Q. So InfoWars -- well, if it happened that
12 InfoWars went and searched and dug through records for
13 private business filings and used DMCA reports that it
14 had gotten to suss out that Mr. Pozner was the head of
15 HONR and then reported it to its audience, that wouldn't
16 be a good thing if that happened, right?

17 MR. BARNES: Objection as to form.

18 A. Well, I don't have any knowledge of what
19 you're talking about there.

20 Q. (BY MR. BANKSTON) I'm just saying: If it
21 happened hypothetically -- if, hypothetically, InfoWars
22 went to some lengths to unmask a person who was running
23 a charity that was trying to stop people from being
24 abused and then disclosed that to its audience with
25 maps, that wouldn't be a good thing?

1 A. That's, from my memory, not what happened. I
2 can't comment on hypotheticals.

3 Q. So if I was to say to you if somebody was to
4 come along and strike your hand with a hammer, would it
5 hurt, you can't answer that question?

6 MR. BARNES: Objection as to --

7 A. I'm not striking anybody with hammers.

8 Q. (BY MR. BANKSTON) If I asked you: If I gave
9 you a big bowl of chili, might it affect your memory,
10 you can't answer that; that's hypothetical? Correct?
11 You're just not going to answer those kind of questions?

12 A. (No audible response.)

13 Q. I'll take it that's a no. Let's move on.

14 MR. BARNES: I'll take it that was a
15 question? Is that a question? That's a comment; that's
16 not a question. This is becoming one of the most
17 harassing -- this is for TV and for PR, not for a
18 legitimate suit. That's what this is. That's all this
19 is. You want to put it on TV. That's all -- and this
20 is just a show, and it's a bad show at that. It's a
21 show of how-not-to-be-a-lawyer-in-deposition-of-a-case
22 show.

23 I mean, if you want to be fair and you
24 want to ask real questions, go ahead; but don't make
25 comments and then try to reinterpret those comments as a

1 question and then try to put words in the mouth of the
2 witness. I mean, a first year law student should know
3 that.

4 MR. BANKSTON: What was your objection?

5 MR. BARNES: The objection was to your
6 comment saying that there was an answer; and my point
7 was you didn't ask a question so there couldn't have
8 been an answer. And I was objecting for the record
9 purposes that no answer had been given to a question
10 that had not been asked.

11 MR. BANKSTON: Do you maybe want to take
12 a break so we can have a few breaths?

13 MR. BARNES: Yes.

14 MR. BANKSTON: Yeah, you might need to do
15 that.

16 MR. BARNES: Yeah, absolutely. And maybe
17 you can go back and read how to ask people questions.

18 MR. BANKSTON: We're off the record.

19 THE VIDEOGRAPHER: Off the record

20 1:34 p.m.

21 (Off the record from 1:34 to 1:48 p.m.)

22 THE VIDEOGRAPHER: We are back on the
23 record at 1:48 p.m.

24 Q (BY MR. BANKSTON) Mr. Jones, I want to talk a
25 little bit more about that episode on February 12, 2015,

1 the one we had looked at with the maps; and I want to
2 show you a clip of your message to the parents that were
3 complaining and ask you some questions. This clip,
4 again, is from February 12th, 2015.

5 MR. BANKSTON: Can you play Hornets?

6 (Video playing.)

7 Q (BY MR. BANKSTON) So for complaining, you
8 were going to bring InfoWars to their hometown?

9 MR. BARNES: Objection as to form.

10 A. I have no idea what that 3-second clip was.

11 Q. (BY MR. BANKSTON) Well, forget the 3-second
12 clip. For complaining, you were going to bring InfoWars
13 to their hometown?

14 A. That is not what I said.

15 Q. Okay. Well, a couple months later -- hang on,
16 Mr. Jones. I'm going to hand you what I am now marking
17 as Exhibit 5.

18 (Exhibit 5 marked.)

19 Q. (BY MR. BANKSTON) A couple of months later,
20 in the spring of 2015, you sent this man, a cage
21 fighter, to go badger and yell obscenities at Sandy Hook
22 residents, right?

23 A. No.

24 Q. No? You know who that is, right?

25 A. Yes.

1 Q. Okay. That's Mr. Bidondi?

2 A. Yes.

3 Q. I want to play you a clip of Mr. Bidondi in
4 Newtown. This is from June 8th, 2015.

5 MR. BANKSTON: Can you play the clip of
6 Bidondi?

7 (Video playing.)

8 Q (BY MR. BANKSTON) And, Mr. Jones, those are
9 hardly the only people that Mr. Bidondi harassed on his
10 multiple trips to Newtown, correct?

11 MR. BARNES: Objection as to form.

12 Q. (BY MR. BANKSTON) Correct?

13 A. I mean, almost everything you said is not
14 true. So there's no way to respond to it. No, not
15 correct.

16 Q. Okay. That was Mr. Bidondi calling people who
17 were involved in Sandy Hook crooked, corrupt, piece-
18 of-shit motherfuckers, right? That's what we just saw?

19 MR. BARNES: Objection as to form.

20 Q. (BY MR. BANKSTON) That's what we saw on the
21 video, Mr. Jones, correct?

22 A. I didn't quite hear all of it.

23 Q. Okay. I want to show you something you said
24 after Mr. Bidondi went to Sandy Hook about the school
25 itself; and I'm going to show you a clip from July 7th,

1 **2015.**

2 MR. BANKSTON: Can you play Stocked the
3 School?

4 (Video playing.)

5 **Q (BY MR. BANKSTON) First, Mr. Jones, you see**
6 **the headline at the top of that screen, "The FBI says no**
7 **one killed at Sandy Hook"?**

8 A. Yes.

9 **Q. You're familiar that's an article that**
10 **InfoWars published at one time?**

11 A. Yes, the FBI said no deaths that year in Sandy
12 Hook on their website.

13 **Q. Is that what they say?**

14 A. I'm going from memory. You can pull it up.

15 **Q. So you say that headline's true?**

16 A. The FBI later amended it and said that it was
17 an error.

18 **Q. Oh, they amended it? That happened?**

19 A. Uh-huh.

20 **Q. Okay. Let's move on to 2016. And in the 2016**
21 **election you found yourself having to discuss Sandy Hook**
22 **because Hillary Clinton actually brought you up**
23 **specifically in a campaign speech, didn't she?**

24 A. Yes.

25 **Q. And that she -- she wanted to put light on**

1 you, in other words? That was part of her campaign
2 strategy?

3 A. Yes.

4 Q. Now, after the campaign was over, in November
5 2016, you directly addressed the parents in a video
6 called your final statement and accused some of them
7 being actors, right?

8 A. No.

9 Q. Okay. I'm going to show you the very end of
10 your clip, your message to the parents on November 11th,
11 2016 in the final statement on Sandy Hook.

12 MR. BANKSTON: Can you play the video
13 clip titled Soap Opera?

14 (Video playing.)

15 Q (BY MR. BANKSTON) That was not the extreme
16 caution that your chief reporter, Mr. Watson, had been
17 urging, correct?

18 MR. BARNES: Objection as to form.

19 Q. (BY MR. BANKSTON) Correct?

20 A. I mean, if people had been coached about
21 certain political anti-gun statements, I have a right to
22 say that they're putting out political talking points.

23 Q. "I know when I'm watching a movie, and I know
24 when I'm watching something real. We have seen soap
25 operas before." I mean, this is an accusation about

1 **actors, correct?**

2 A. No, not specifically about that. I was saying
3 politically it turned into something synthetic to go
4 after guns, and I think that's why you don't play the
5 whole clip.

6 Q. And then at the end of the clip, you point
7 into the camera and say, "Let's look into Sandy Hook."
8 And then there's a title card that says, "InfoWars you
9 are the resistance." The "you" in the "You are the
10 resistance," that's your audience, correct?

11 A. That's a tagline on everything, so it wasn't a
12 specific Sandy Hook message.

13 Q. But I'm asking you the meaning of that
14 tagline, "You are the resistance." "You" means your
15 audience?

16 A. It means -- yes, uh-huh, or it means -- it
17 just means the American people.

18 Q. Am I part of the resistance?

19 A. Well, all the Democrats.

20 Q. I'm sorry? Did I...

21 A. Well, that's a Democratic tagline that they
22 took from me: You are the resistance.

23 Q. Okay.

24 A. You're not a Democrat?

25 Q. I don't know why you -- where you're getting

1 that from.

2 A. All I'm saying it's a -- Democrats use that.

3 Q. Okay. Mr. Jones, we've talked a little bit
4 about the Sandy Hook investigators, one of them,
5 Mr. Halbig and one of them, like, Mr. Fetzer. These are
6 people who have been investigating Sandy Hook.
7 Mr. Halbig's been a considerable source of information
8 for you. You will admit that, correct?

9 A. Yes.

10 Q. Now, these Sandy Hook investigators, these
11 people were so crazy that you had to realize at some
12 point that what they're saying isn't true and that Sandy
13 Hook wasn't a fake, right?

14 MR. BARNES: Objection as to form.

15 A. I found out some of what they were saying was
16 not accurate.

17 Q. (BY MR. BANKSTON) Okay. Let me play a clip
18 for you that's something you said just a little while
19 ago, on January 19th, 2019.

20 MR. BANKSTON: Can you play Kooky?

21 (Video playing.)

22 Q (BY MR. BANKSTON) When did you finally
23 realize that these crazy people were crazy?

24 MR. BARNES: Objection as to form.

25 A. I can't answer exactly because it's so many

1 years; but about three years ago, I found that some of
2 what they said was inaccurate.

3 Q. (BY MR. BANKSTON) Okay. So, essentially,
4 then, I think what you're getting at is you haven't been
5 saying Sandy Hook is fake for years?

6 A. I have been more on the side, going back about
7 three or four years ago, that it did happen and then
8 started talking about some of the anomalies that were
9 not anomalies; and then that triggered more of the ire
10 of those folks as they got more, I think, extreme.
11 That's what I'm saying: This is all cherry-picked here.

12 Q. Well, I'm just trying to understand,
13 Mr. Jones. At some point you learned that those people
14 were crazy; you couldn't believe what they were saying.
15 You couldn't say it was synthetic or completely fake
16 anymore. When did you stop saying it was --

17 A. I don't know. It was probably four years ago
18 I told Bidondi not to say he worked with the InfoWars,
19 because he didn't. And he's a professional wrestler,
20 not a cage fighter. I mean, I remember that. That's a
21 date we could find when we sent him e-mails and said,
22 "You don't work here. Stop saying our name. Don't do
23 that in our name," because I saw that stuff; and I was
24 like -- I remember seeing it in the paper. And I was
25 like, "Bidondi doesn't work here." I mean, he did stuff

1 for us years before that, you know.

2 MR. BANKSTON: Objection, nonresponsive.

3 A. I mean, I'm really answering your question.

4 Q. (BY MR. BANKSTON) No, Mr. Jones. I'm asking
5 you about Mr. Halbig, the sources that you had, not your
6 employees.

7 A. He's not my employee.

8 Q. I'm talking about these investigators, right?
9 These investigators, at some point -- we just saw a
10 clip -- you realized they were kooky, couldn't say it
11 was synthetic anymore. When do you think is the last
12 time you -- like, that ended? When did you stop calling
13 it fake?

14 MR. BARNES: Objection as to form.

15 A. I mean, I can't accurately say that.

16 Q (BY MR. BANKSTON) Okay. Let's try to -- hold
17 on for a second. Let me take you back to April 20th,
18 2018. I want to play you a clip on April 20th, 2018. I
19 believe it was a day or two after you were first sued.

20 MR. BANKSTON: Can you play the clip Not
21 Doing It?

22 (Video playing.)

23 Q (BY MR. BANKSTON) When you say you're not
24 doing it, is this meaning that you haven't been saying
25 Sandy Hook was fake for several years?

1 A. No. What it means is the media currently and
2 then says, "Jones is saying it. Jones is sending
3 people."

4 And then never showing me saying, "Don't
5 go investigate it. I believe mass shootings have
6 happened. And I'm sorry and some of the anomalies we
7 were told were wrong." And I've said it -- I've
8 probably been saying that for four years.

9 **Q. Okay.**

10 A. And then the media, the corporate media, wants
11 to use it to, I guess, to bring back gun control or
12 anti-free speech stuff, whatever it is; and so it
13 continues to do that over and over again.

14 **Q. Right. You kind of -- you end up in the**
15 **crosshairs because they want to generate clips, right?**

16 A. Well, I'm not sure how all that works; but I
17 can tell you: Sandy Hook is not my identity. I covered
18 it less than one-tenth of 1 percent until Hillary gave
19 her All Right Speech; and then there were thousands of
20 articles, you know, saying, "Jones is doing this. Jones
21 is sending people there." And it kind of restarted. A
22 big resurgence happened on the street saying, "How dare
23 you not -- you not say it happened; you don't think it
24 happened?" It's a big thing. It was, like, spray
25 painted on the walls here in Austin on the side of the

1 highway that, you know, Sandy Hook was staged. That's a
2 big thing on the Internet.

3 And so the media made -- Hillary made it
4 this huge thing on which she said Pepe the Frog was a
5 white supremacist; and made the frog a white
6 supremacist. She had a lot of power at that point in
7 the news.

8 And so I've been trying to say,
9 particularly, you know, "Hey, it's not my identity. And
10 I believe it happened and I'm sorry for your -- you
11 know, any pain you've had." But I'm not going to be
12 Sandy Hook man and then take what everybody else did as
13 if what people have said and done is all me and then I'm
14 kind of like the sin eater and it's all put on me when
15 that's not my identity.

16 I mean, this idea -- I know they have
17 shows, like Homeland, and things where there's
18 supposedly Alex Jones and he does all these things.
19 That's not a real person. That's an actor. And then
20 kind of the media fantasizes that they're fighting, you
21 know, this big boogymen that's on Homeland; and that's
22 not who I am.

23 **Q. Do you remember what my question was? What**
24 **was my question?**

25 **A.** But I just answered your question. I mean,

1 ask your question again. There's no yes-or-no answer to
2 something like that.

3 Q. Well, I mean, you don't even know what the
4 question was because you were just talking. You were
5 just ranting, like you do on your show, right?

6 A. No, I was being honest with you about the
7 situation.

8 Q. All right. Well, let's walk through it,
9 Mr. Jones. We know you started making videos calling it
10 fake in 2013, right? No doubt there?

11 MR. BARNES: Objection as to form.

12 Q. (BY MR. BANKSTON) Right?

13 MR. BARNES: Objection as to form.

14 A. I can't comment on edited videos you've got
15 here.

16 Q. (BY MR. BANKSTON) I'm not asking you about
17 edited video, Mr. Jones. I'm asking you: In 2013 you
18 made videos calling it fake, correct?

19 MR. BARNES: Objection as to form.

20 A. I think I was asking if it was fake, yes.

21 Q. (BY MR. BANKSTON) Admittedly, you weren't
22 asking; you were saying it was fake, and the evidence is
23 overwhelming, right?

24 A. I mean, we have a right in this country to
25 question things.

1 Q. I'm not saying what you did and didn't have a
2 right to do. I'm just asking you what you did. You
3 made videos in 2013 saying it was fake, right?

4 A. I think saying -- I remember making statements
5 that it looks fake to me, but we're not a hundred
6 percent.

7 Q. Okay. And then in 2014 and 2015 you were
8 making videos, calling it synthetic, completely fake,
9 manufactured, phony as a three-dollar bill. That was
10 happening all through 2014 and 2015, right?

11 MR. BARNES: Objection as to form.

12 Q. (BY MR. BANKSTON) And there's transcripts of
13 that, right?

14 A. I'm not denying that I've questioned Sandy
15 Hook.

16 Q. Okay. That's all I'm asking.

17 Then in 2016 we know it became an issue
18 because of the campaign. We saw a video called your
19 final statement. We've looked at that. And we've seen
20 you saying really false things about Sandy Hook all
21 through 2017 in these videos, too, right?

22 MR. BARNES: Objection as to form.

23 A. Edited videos. I can't respond to it.

24 Q. (BY MR. BANKSTON) Okay. If you just say --
25 for instance, if you say that there are Port-A-Potties

1 showing up within an hour in 2017, that's not true,
2 right?

3 A. We don't know that.

4 Q. Exactly, right? You don't know that, but you
5 said they did?

6 A. That's what the reports were from people we
7 believed were credible.

8 Q. Okay. But in 2017 you're still calling it
9 fake?

10 MR. BARNES: Objection as to form.

11 A. No. I was -- the media would get me to
12 respond and say, "Well, what were the anomalies?" And
13 then I would -- like Megyn Kelly, I said, "I believe it
14 happened."

15 She goes, "But what are the anomalies?"

16 Q. (BY MR. BANKSTON) Okay.

17 A. And then they edited it together to have me
18 saying it didn't happen. That's just incredibly
19 deceptive.

20 Q. Okay. I want to show you something you said
21 on October 26th, 2017; and this is a video called \$3
22 Bill.

23 MR. BANKSTON: Can you play that?

24 (Video playing.)

25 Q (BY MR. BANKSTON) That video, that was made

1 **October 26th, 2017. That's just a couple of months**
2 **before you were sued, wasn't it?**

3 A. I would guess if the date's right.

4 Q. And that was almost five years after the
5 **parents had told you how distressing what you were doing**
6 **was to them, right?**

7 A. I say right there I don't know what happened
8 at Sandy Hook.

9 Q. **It says it's as phony as a 3-dollar bill.**

10 MR. BARNES: Objection as to form.

11 A. Talking about Nancy Grace where she says she's
12 on location and they've got trucks and you see the same
13 trucks driving behind her and the guest, that's what I
14 mean. It's the media creating a synthetic thing around
15 it to script the outcome of what they want. You're
16 taking it out of context.

17 Q. **(BY MR. BANKSTON) Oh, really? That's what**
18 **"phony as a 3-dollar bill" means? That's how you've**
19 **used that term over the years?**

20 A. Talking about Nancy. That clip is long enough
21 where I can tell what I'm talking about. I mean,
22 Nancy's sitting there, where she's sitting there in a
23 roundabout; and she says the other person is...

24 Q. **I'm familiar, Mr. Jones. Ashleigh Banfield**
25 **sitting in a chair. They're both in the same parking**

1 lot. As a result of the satellite feed, you see the
2 same cars going behind them; and it shows they're
3 actually in the same location, even though they're
4 trying to do it like a satellite feed, right?

5 A. Yeah.

6 Q. Right. And then, obviously, they didn't have
7 a guest to put on. They put those two people together.
8 To you, that's an anomaly, right? That's one of the
9 anomalies that caused you to have doubts?

10 A. They lied and said they were on location.

11 Q. Yeah, sure, they lied. Yeah, they said, "Hey,
12 she's over here; and I'm over here." And they're
13 actually in the same place?

14 A. Yeah.

15 Q. They were pulling a -- they pulled a trick?

16 A. She said she had just got a text from The
17 Atlanta --

18 Q. We'll talk about that.

19 A. -- rooftop.

20 Q. Put a pin in that, Mr. Jones. We'll talk
21 about that. I definitely want to get back and talk
22 about that; but in terms of what you were saying in that
23 video, you said, "We've looked at both sides. We've
24 tried coming at it from all angles; but, folks, it's as
25 phony as a 3-dollar bill." That's what you said?

1 A. Talking about the media coverage, yes, in
2 context.

3 **Q. Oh, in that you were talking about the media**
4 **coverage?**

5 A. Yeah, that's what I'm talking about. That's
6 what I'm talking about, Nancy Grace.

7 **Q. And Anderson Cooper, right?**

8 A. Yes.

9 **Q. The blue screen, you said: It's fake, wasn't**
10 **there. It didn't happen. They weren't on location.**

11 **That's what you said?**

12 MR. BARNES: Objection as to form.

13 A. Now, generally when someone is on location, it
14 doesn't mean that the person being interviewed is even
15 part of it. It means that they'll say, "Hey, you're
16 going to be standing here, talking to Anderson Cooper."
17 And they're not talking. At that level of television
18 they routinely do that.

19 CNN is famous for it. They'll even run
20 audio in the back of the video and, like, you'll hear
21 is -- another that happened a few months ago is CNN, you
22 hear a bunch of crickets and the cars. All of sudden
23 the tape stops and they have to start it back up, and
24 they're supposedly on location in Gaza.

25 **Q. (BY MR. BANKSTON) I have no idea what you're**

1 talking about, but it's not important. What I'm asking
2 you is --

3 A. Oh, okay. Okay.

4 Q. -- in terms of Anderson Cooper, you said that
5 Anderson Cooper wasn't at Sandy Hook; he was not there?

6 MR. BARNES: Objection as to form.

7 Q. (BY MR. BANKSTON) Right, you said that?

8 MR. BARNES: Objection as to form.

9 A. I don't know how to respond to that. Yes, I
10 believe that he used -- that he faked being on location
11 once. That doesn't mean that the people involved aren't
12 the parents or that it didn't happen. It means CNN's
13 famous for faking locations.

14 Q (BY MR. BANKSTON) Okay. I want to show you a
15 clip of something you said in 2015, and this is a clip
16 that's become kind of famous. And so I want to get your
17 input on something you said in 2015 on January 13th.
18 And let me show you a clip called Hoax.

19 (Video playing.)

20 Q (BY MR. BANKSTON) Mr. Jones, can you now
21 admit that these statements were reckless?

22 A. No. I think at that point in my life, in
23 whatever the context was that I was saying I think
24 basically the whole thing was fake, I mean, that's my
25 right to do that. I legitimately had believed that

1 Sandy Hook was probably completely staged at different
2 periods of my life. Like, I believed Jussie Smollett
3 was staged or the WMDs were staged. And I'm on record
4 on hundreds of these events when I think they're staged.
5 I've learned sometimes I'm wrong.

6 And so, no, I stand by the fact that I
7 genuinely believed that. And one of my best reporters,
8 Paul, thought that was wrong; and so that shows that we
9 have real debates, real discussions. And what people
10 believe, as long as I think they really believe it, it's
11 what we debate and discuss. And that's like most any
12 talk radio show there is.

13 **Q. Everything -- every last word of factual claim**
14 **in those statements are things that you repeated with no**
15 **confirmation from people you now admit are crazy, right?**

16 A. Well, I don't want to call people crazy and
17 get sued by somebody else. I have found that some of
18 what they said and then the reports they put out were
19 not accurate.

20 **Q. Well, you certainly have no problem calling**
21 **them kooky, right? You've said it on the air to, like,**
22 **millions of people?**

23 A. Yeah. I mean, yeah, I mean, I think it's --

24 **Q. These people are kooky, and everything you**
25 **said in that was based on what they told you and with no**

1 **confirmation?**

2 A. I wouldn't say everything. There was a lot of
3 different sources, a lot of different things; and then
4 there was a cover-up on the files and the reports and
5 Lanza and his background. And so you've got a cover-up,
6 and you're not sure exactly what's going on and the
7 extent of it.

8 **Q. Let me make sure I have this really clear.**

9 A. Uh-huh.

10 **Q. You don't believe the official story of Sandy**
11 **Hook. You think there was a cover-up. You think there**
12 **was manipulation. You think there was some sinister**
13 **thing going on.**

14 A. I still -- yes, I still think -- I think
15 children died. I believe mass shootings happen. They
16 just had one in Brazil, a tragedy. And I believe it's a
17 crisis. And I go back to the point of all gun owners
18 being collectively blamed. Then it's traumatic and so
19 people go and they find anomalies. And then I've kind
20 of retrospectively gone back and seen how I did believe
21 that stuff.

22 And then I go back and I'm now, studying
23 more, actually, the real anomalies; and it's just the
24 School System and Government trying to covering its rear
25 end from liability. And so there definitely has been a

1 cover-up of the events.

2 And I think there's a lot of evidence
3 showing there could have been a second shooter. There
4 is the helicopter footage of the man in woods.

5 I still have questions about Sandy Hook,
6 but I know people that know some of the Sandy Hook
7 families. They say, "No, it's real," people I think are
8 credible. And so over the years, I've -- you know,
9 especially as it's become a huge issue, had time to
10 really retrospectively think about it. And as the whole
11 thing matured, I've had a chance to believe that
12 children died and it's a tragedy; but there are still
13 real anomalies in the attempt to basically keep it
14 blacked out that generally, when you see that in
15 government, something's being covered up.

16 **Q. And after you were sued, you said there was a**
17 **police stand down in Sandy Hook, right? You said that?**

18 A. I said that about Parkland, too. I think
19 there was a very slow response on both.

20 **Q. Now, you're a parent. Just imagine with me**
21 **for a moment that you lost one of your children. One of**
22 **your children was murdered and you think you know who**
23 **did it and there's been a justice system that worked**
24 **that said this is who did it. And then someone who**
25 **thinks that they have information comes to you and says,**

1 "Mr. Jones, the person who killed your son, information
2 about him is being covered up. There's a government
3 conspiracy. They're manipulating. There's a police
4 stand down." Those things would be upsetting to you,
5 wouldn't they?

6 MR. BARNES: Objection as to form.

7 A. I think the whole thing's upsetting, and
8 everybody's upset by it. And people see anomalies, and
9 citizens have rights to ask questions.

10 Q. (BY MR. BANKSTON) Right. So if there was a
11 police stand down, that'd be upsetting, right? I mean,
12 come on, if the police chose not to react, that's
13 upsetting, isn't it?

14 A. Well, there was -- in Columbine, there was --
15 at Parkland that -- they've ruled in Florida there was a
16 police stand down. I was the first to report that
17 because we had students call in.

18 Q. I'm not asking --

19 A. And CNN said they were actors.

20 Q. I'm not asking if there was a police stand
21 down in Parkland. I'm not asking if one happened at
22 Sandy Hook. I'm saying that if children are being
23 attacked and the police anywhere stand down, that's
24 upsetting?

25 A. Yes.

1 Q. Now, by the same token, if the police didn't
2 stand down but somebody was told -- a parent, a victim,
3 was told that the police did stand down, falsely, that's
4 also upsetting?

5 A. I believe there's been lawsuits by the
6 families about a lack of response.

7 Q. Was that my question? Is that in any way my
8 question, Mr. Jones?

9 A. Well, I don't understand your question.

10 Q. My question is: If somebody was to lie to
11 you -- your children were killed and then somebody came
12 to you and lied to you and said the police stood down,
13 that'd be distressing?

14 MR. BARNES: Objection as to form.

15 A. I don't know of anyone -- if people believed
16 there was a stand down, then it's not a lie.

17 Q. (BY MR. BANKSTON) If somebody came to you
18 about your murdered child and said, "Your murdered child
19 wasn't actually murdered; he was stolen by aliens" and
20 lied to you about that, that's upsetting, right?

21 A. Yeah, uh-huh.

22 Q. Can you now admit that you've done an
23 outrageous wrong to these parents? Can you admit that?

24 A. You know, the mainstream media is who always
25 takes it and makes it a huge issue and then says that

1 I'm saying it and gets me to respond. And it's lawyers
2 like you and people that glom onto this for fame that
3 then try to get the fame and then say that I'm the
4 person that's promoting it. And it's obscene, in my
5 view.

6 **Q. So that's "no"?**

7 A. No. I genuinely questioned it. You know, I
8 think the Government and the media that's been caught
9 lying so much has created an atmosphere where people
10 don't know what's true.

11 **Q. So you do not believe that you've done an**
12 **outrageous wrong to these parents?**

13 A. No, I've not done an outrageous wrong to the
14 parents.

15 **Q. Okay. In that clip you said the state police**
16 **have gone public. Have you ever argued anything about**
17 **the state police?**

18 A. Like I told you, most of this stuff I can't
19 even remember.

20 **Q. Do you, sitting here today, remember anything**
21 **about the state police going public? Is there anything**
22 **that occurs to you today?**

23 A. I can't remember.

24 **Q. Okay. I want to talk to you about rescue**
25 **helicopters. You mentioned rescue helicopters a lot.**

1 It was puzzling to you that rescue helicopters weren't
2 called, correct?

3 A. Yes.

4 Q. Okay. I take it you don't know how long it
5 takes for a LifeStar crew from Hartford Hospital to be
6 dispatched, travel to Sandy Hook, and for the engine to
7 calm down to safely approach the vehicle? From
8 Hartford, you don't know how long that takes?

9 A. No, I don't.

10 Q. And, by the same token, you don't know how
11 long it takes for an ambulance crew to be dispatched to
12 loading of the patient from Danbury Hospital, 9 miles
13 down I-84? You don't know that?

14 A. No, I was going off Halbig's and others, that
15 professor's analysis of it.

16 Q. Okay. I think we've agreed before that Sandy
17 Hook was real. It was not staged. It was not phony.
18 You were wrong about that and --

19 A. Well, I want to be clear: I believe children
20 died. I believe there was a mass shooting. I still
21 think that there was a man in the woods in camo. There
22 were other reports. I saw the video. And I believe
23 that, you know, normally after every person -- remember,
24 it's happened before -- every person in a shooting died;
25 and just a lot of experts I've talked to, including

1 retired FBI agents and other people and people high up
2 in the Central Intelligence Agency, have told me that
3 there is a cover-up in Sandy Hook.

4 **Q. Okay. Have there ever been any InfoWars**
5 **employees who have been terminated or formally**
6 **disciplined for allowing false Sandy Hook information to**
7 **reach the air?**

8 MR. BARNES: Objection on two grounds:
9 One is to form; and secondly, Mr. Jones is only here in
10 his personal capacity. He's not here as a
11 representative of Free Speech.

12 MR. BANKSTON: I'm not asking to bind
13 him. If he has personal knowledge, he can tell me.

14 A. Bidondi was not working for us when he went to
15 Sandy Hook. I told him not to. And then I told him to
16 stop using InfoWars, over and over, repeatedly, until I
17 had to tell him that I'm going to go public on air and
18 say that he's a bad person if he didn't stop using my
19 name.

20 **Q. (BY MR. BANKSTON) So you're going to tell me**
21 **that after that episode in Newtown happened, Mr. Dew**
22 **didn't communicate with Mr. Bidondi and ask him to cover**
23 **Sandy Hook some more?**

24 A. I haven't reviewed all the things that went on
25 with the other reporters and people. I know I said to

1 him, "Stop doing it." Even the year before that I said,
2 "Don't go in our capacity to any of these places." And
3 I'm just going off memory about that because we told him
4 we did not want him covering Sandy Hook, and the last
5 thing he covered for us was the Boston bombing.

6 **Q. Who is "we" when you say, "We told him not to**
7 **cover Sandy Hook"?**

8 A. I mean, I told him.

9 **Q. Okay.**

10 A. He lives up there.

11 **Q. How did you tell him?**

12 A. Over the telephone, and I believe in e-mails.

13 **Q. Okay. You use e-mails to communicate with**
14 **employees and people like Mr. Bidondi?**

15 A. I remember saying in a meeting around eight
16 years ago -- I said, "Listen, it's funny. He's a
17 professional wrestler. He likes to clown around. I
18 don't want to be a bunch of clowns. We're not the
19 Howard Stern Show. So tell him to stop doing stuff in
20 our name." And, basically, he just wouldn't stop.

21 **Q. You've repeatedly said the 9/11 Attacks were**
22 **orchestrated by the Government, right?**

23 A. Well, I believe criminal elements of our
24 Government were involved in 9/11.

25 **Q. Regarding Columbine, you said, "Columbine we**

1 know was a false flag; I'd say 100 percent false flag, a
2 globalist operation."

3 A. By "false flag," they knew it was coming; and
4 they let it happen.

5 Q. Okay. The Oklahoma City bombing you said was
6 a false flag, "We've never had one so open and shut."

7 A. A hundred percent. I can name the names.

8 Q. And that Tim McVeigh was an innocent patsy?

9 A. He was set up, yeah.

10 Q. Okay. Hours after James Holmes shot up the
11 Aurora movie theater, you said that was 100 percent a
12 false flag, mind-control event?

13 A. He told the jailers that he was in a mind
14 control program, like Theodore Kaczynski, the Unabomber.

15 Q. Okay. The shooting of Gabrielle Giffords you
16 called a staged mind-control operation?

17 A. Say that again.

18 Q. The shooting of Gabrielle Giffords you called,
19 quote, "a staged mind-control operation"?

20 A. I believe we looked at those possibilities.

21 Q. The Douglas High School shooting in Parkland,
22 Florida, you told your audience you were nearly certain
23 it was a false flag to start a civil war, right?

24 A. That's out of context. What I said was I
25 believe the shooting happened, but that the way it was

1 being hyped, that the police stood down. We talked to
2 the students, and it was later confirmed.

3 (Exhibit 6 marked.)

4 Q. (BY MR. BANKSTON) I want to show you the
5 context so we can make sure we're not taking it out of
6 context. I'm going to hand you the Affidavit of Fred
7 Zipp. I would like you to turn the document onto its
8 back and flip one page to page 25. Do you see that
9 tweet right there? There's a tweet at the top of the
10 page, right?

11 A. Uh-huh.

12 Q. A tweet is a message distributed to InfoWars'
13 thousands -- hundreds of thousands of Twitter followers,
14 correct?

15 A. Yes.

16 Q. That tweet reads, "Probability Florida Attack
17 False Flag For Civil War 90 percent," correct?

18 A. Yes.

19 Q. The remainder of that tweet says, "Alex Jones
20 calculates the probability of the Florida school
21 shooting being a false flag of the Deep State to create
22 resentment towards conservatives, gun owners, and sow
23 the seeds of civil war," correct?

24 A. That's a tweet.

25 Q. That's the context of that message, correct?

1 A. I didn't put this out, but they took a
2 derivative of what I said on air and put it out.

3 **Q. InfoWars published that?**

4 A. Well, the video that it links to is in the
5 context.

6 **Q. I'm asking you: That tweet --**

7 A. Yes.

8 **Q. -- InfoWars published that tweet?**

9 A. I believe so.

10 **Q. Thank you, Mr. Jones.**

11 **The November 2017 church shooting in**
12 **Sutherland Springs, Texas, you put forth the theory that**
13 **it was, quote, "Part of the Antifa Revolution against**
14 **Christians and conservatives or an ISIS op," correct?**

15 A. Well, I that's out of -- I was giving, like,
16 possible things; and then it turned out -- it turned out
17 that he -- you know.

18 **Q. In November 2017, the same month, there was a**
19 **horrific mass shooting at the Las Vegas music festival.**
20 **You remember that, correct?**

21 A. Uh-huh.

22 **Q. And you said, quote, "Vegas is as phony as a**
23 **three-dollar bill or as Obama's birth certificate,"**
24 **correct?**

25 A. Yes.

1 Q. Okay. So it really wasn't a surprise that you
2 said the exact same thing about Sandy Hook that you've
3 said about all of these other shootings, correct?

4 A. Yeah, well, I talked to the FBI hostage rescue
5 team on the thing in Las Vegas.

6 Q. Okay. Let's talk a little bit about
7 Pizzagate. You told your audience -- first, let's start
8 off, Pizzagate is the allegation that there was a
9 pedophile sex dungeon in a Washington D.C. pizzeria with
10 connections to Hillary Clinton and the DNC, right?

11 MR. BARNES: Objection --

12 Q. (BY MR. BANKSTON) That's what Pizzagate is?

13 MR. BARNES: Objection as to form.

14 A. Does that mean to ask it again?

15 Q. (BY MR. BANKSTON) No, you can answer,
16 Mr. Jones.

17 A. Say it again.

18 Q. Pizzagate is the allegation that there was a
19 pedophile sex dungeon being operated out of the basement
20 of a pizzeria in Washington, D.C., with connection to
21 Hillary Clinton and the DNC?

22 A. No.

23 Q. Okay. Tell me what Pizzagate was.

24 A. Pizzagate came out of the John Podesta
25 e-mails, head of Hillary's campaign. I'm talking about

1 Aleister Crowley rituals. And then the media diverted
2 onto 4chan and covered a pizza place that the DNC went
3 to and that was going on and created the dis-info about
4 these dungeons and basements and everything to then
5 distract onto that away from the serious stuff in the
6 FBI manual that they use things, you know, things like
7 cheese pizza means, you know, child pornography; and
8 those are code words used for pedophilia. And so that
9 was basically a diversion story, kind of a Karl Rove
10 type trick, where we have a big story and they slip this
11 info into it so that everybody then covers that.

12 **Q. You told your audience, "Something's going on**
13 **in that pizzeria," right?**

14 MR. BARNES: Objection as to form.

15 A. I mean, I did point out there was a lot of
16 really bizarre art and that Tony Podesta did not hide
17 the fact in the Washington Post 2007, a big write-up
18 about his deviant art, that he likes art that most
19 people would be arrested for, yeah.

20 **Q. (BY MR. BANKSTON) You said, "Something's**
21 **being covered up in that restaurant," right?**

22 A. I don't remember saying that specifically.

23 **Q. You said, "You have to go investigate it for**
24 **yourself." Didn't you say that?**

25 A. I don't know if that's the exact quote.

1 Q. So if Mr. Zipp reported that in that affidavit
2 in front of you, he would be wrong?

3 A. I don't know Zipp. I mean, I don't know
4 Mr. Zipp, so.

5 Q. Well, Mr. Zipp who's sitting with us, who's
6 the former editor of the Austin-Statesman, he's a UT
7 Journalism Professor. He prepared that affidavit. If
8 he messed up and misquoted you, that's a problem, isn't
9 it?

10 A. Where is it? I mean, I haven't had a chance
11 to read this.

12 Q. Well, I'm just asking you --

13 A. Well, let me read it. Let me read it then.

14 MR. BARNES: Which page are we supposed
15 to be at, by the way?

16 MR. BANKSTON: I'm not actually referring
17 him to a specific page number, but I can. Let's do
18 that.

19 MR. BARNES: That would be helpful.

20 Q. (BY MR. BANKSTON) I believe that's going to
21 be in the Heslin affidavit.

22 Let's talk about the Plaintiff's Petition
23 then. Have you seen these statements in the Plaintiff's
24 Petition about Pizzagate?

25 A. I'm confused.

1 Q. I'm telling you right now that there's a
2 different affidavit that I'm not going to ask you about,
3 about Pizzagate; but I am going to ask you about
4 Plaintiff's Petition, the lawsuit that was served on
5 you.

6 A. Okay. Can I see it?

7 Q. I'm not even interested in reading it right
8 now. I'm just wanting to know: Do you remember
9 Pizzagate being a subject that came up? Is that
10 something you've looked into in the past couple of
11 months?

12 A. I have been very clear the last two years that
13 I believe that there was no illegal activity going on at
14 that pizza place, and I've told people that on record.
15 So I don't know if you're looking for clips to put on
16 the news of me saying something about that, but...

17 Q. Well, what I'm really getting at, Mr. Jones,
18 is that after you told people to go and investigate it,
19 somebody did and then opened fire there, right? That
20 happened?

21 A. No, there's evidence that person did that from
22 any directions I gave him.

23 Q. Okay. You made similar allegations on
24 InfoWars. There are videos about an Austin pizza place,
25 East Side Pies, similar allegations made on InfoWars,

1 **right?**

2 A. I don't know if I've made those allegations.

3 **Q. You apologized for them, though, didn't you?**

4 A. I think a reporter went and pointed out the
5 same symbol or something.

6 **Q. Did you apologize?**

7 A. I don't remember.

8 MR. BARNES: Objection as to form.

9 **Q. (BY MR. BANKSTON) You apologized to Chobani,**
10 **though, right for publishing stories that they were**
11 **caught importing migrant rapists, right?**

12 A. That was a technical thing versus there were
13 rapes in the town, but it wasn't the company themselves
14 that brought the rapists in. It was the policies of the
15 Federal Reserve Board member who owns Chobani.

16 **Q. You apologized?**

17 A. I did.

18 **Q. You also just recently apologized for false**
19 **reporting on the murder of DNC Staffer Seth Rich?**

20 MR. BARNES: Objection as to form.

21 A. That was on reporting of another reporter.

22 **Q. (BY MR. BANKSTON) And last year InfoWars had**
23 **to apologize for misidentifying an innocent young man as**
24 **the Parkland High School shooter?**

25 A. I think we did.

1 MR. BANKSTON: I'll tell you what,
2 Mr. Jones, let's take a little break.

3 THE VIDEOGRAPHER: Off the record
4 2:28 p.m.

5 (Off the record from 2:28 to 2:51 p.m.)

6 THE VIDEOGRAPHER: We are back on the
7 record at 2:51 p.m.

8 Q (BY MR. BANKSTON) Mr. Jones, some of your
9 Sandy Hook reporting -- hold on. Excuse me, Mr. Jones.
10 I need to grab a file.

11 Mr. Jones, some of your reporting on
12 Sandy Hook involved an anonymous website known as Zero
13 Hedge. Do you know what Zero Hedge is?

14 A. Yes.

15 Q. Okay. You'll remember that there was an
16 affidavit submitted by one of the Plaintiff's experts
17 that said InfoWars and Zero Hedge promoted and endorsed
18 each other's content. Do you remember that affidavit?

19 A. No.

20 Q. Okay. You've taken issue with that statement,
21 though? You don't believe -- that statements not true?

22 A. I don't know who runs Zero Hedge. I wouldn't
23 say we have a relationship with them.

24 Q. Okay. I want to show you what I'm now marking
25 as Exhibit 7.

1 (Exhibit 7 marked.)

2 Q. (BY MR. BANKSTON) If you want to take a
3 minute to read this, Mr. Jones, what I have handed you
4 is the August 28th affidavit that you executed in the
5 Heslin case. Do you want a minute to read that?

6 A. Sure. Thank you.

7 (Witness silently reading document.)

8 I'm finished.

9 Q. Okay. Mr. Jones, I'd like to direct your
10 attention there at the end of page 1 and spilling onto
11 page 2. I'm going to read a sentence there for you
12 that's highlighted. It states, "None of the defendants
13 ever cooperated in any way with Zero Hedge nor have
14 defendants and Zero Hedge ever promoted or endorsed each
15 other's content." Did I read that correctly?

16 A. Yes.

17 Q. Okay. Now, the next sentence there -- there's
18 been times where Zero Hedge has been cited?

19 A. Yes.

20 Q. And commented about?

21 A. Yes.

22 Q. Right. But to talk about you engage in the
23 promotion or endorsement of Zero Hedge content, that was
24 wrong; that's what this document states?

25 A. Yes, that's wrong. I mean, I don't know who

1 Zero Hedge is. I've reached out to them before and
2 said, "Hey, who are you? I would like you to come on."
3 And there's been no response back.

4 I've said, "Wow, this is a good article
5 from Zero Hedge," like I've said The New York Times has
6 a good story; but I don't have any relationship with
7 them.

8 Q. Right. Okay. Well, I want to show you a
9 video of you talking about Zero Hedge that was taken on
10 June 13, 2017. This clip, unfortunately, is not
11 available online anymore. What you're about to see has
12 been downloaded from a website called
13 sandyhookfacts.com. So I want to show you that video,
14 which is just a recording of yours.

15 MR. BANKSTON: Can you play the clip
16 called Zero Hedge?

17 (Video playing.)

18 Q (BY MR. BANKSTON) When you said in your
19 affidavit that InfoWars and you have never promoted or
20 endorsed Zero Hedge's content, that was a false
21 statement?

22 MR. BARNES: Objection as to form.

23 A. I just said before you played the clip that
24 I've said they've done good reporting.

25 Q. (BY MR. BANKSTON) Sure. But, Mr. Jones --

1 A. That's not an endorsement. I don't know who
2 they are.

3 Q. You're going to tell us that that clip we just
4 saw was not you promoting and endorsing Zero Hedge's
5 content?

6 MR. BARNES: Objection as to form.

7 A. I just told you I said I think they do good
8 reporting.

9 Q. (BY MR. BANKSTON) You think that the
10 statements that you've made in that affidavit were
11 honest, forthright, and complete?

12 A. Yes.

13 Q. Okay. Mr. Jones, you've said in testimony in
14 this case that you've used blue screens before, you have
15 experience with blue screens, and that there can be
16 anomalies if the blue screen is not properly aligned,
17 correct?

18 A. Yes.

19 Q. Tell me how to align a blue screen.

20 A. It depends if it's an older Chromakey model or
21 it depends if it's dozens and dozens of different
22 digital units; but if the lighting isn't correctly
23 displayed against the green screen or blue screen --
24 it's whatever color you really dial it to. TVs use blue
25 screens; a lot of entertainment stuff, green. But it

1 doesn't matter. It can be any color that's not really
2 common that's not going to be on your shirt or on your
3 tie because it will make that disappear as well.

4 And, also, if there's kind of a blue hue
5 to your nose or in the event of a rising point, noses
6 turning is generally the Number 1 thing that disappears;
7 or any hairs that are amiss can create a blue shimmer
8 off of television lights and you'll see areas that
9 disappear. And so that's a telltale sign not of digital
10 breakup, but it's squares.

11 **Q. How do you align it? What does that mean,**
12 **aligning the blue screen?**

13 A. I mean, that's not even really a technical
14 term. You have to turn the lights on, put people in a
15 chair, and make sure the lights are properly set up to
16 then work in the blue screen system.

17 **Q. Can you pull up Exhibit 1?**

18 A. This is 7.

19 **Q. And can you look at Paragraph 3 of Exhibit 1?**
20 **This not technical term, "aligned," that's your term,**
21 **right? You used it in this sworn affidavit, correct?**

22 A. Well, yeah. I mean, I would call -- when you
23 dial just like two different dials, lights, and a thing
24 to make them work together, I'd call that aligned. I
25 mean, that's a pretty good word. I guess you could call

1 it "sync" or --

2 **Q. So the lights -- you're talking about the**
3 **lights need to be aligned, not a blue screen? You've**
4 **got to dial something on a light?**

5 A. Well, no, the lights and the computer program
6 have to be aligned. You have to look at a color scope.
7 You have to make sure the colors are all lined up or it
8 won't work. You have to be perfectly aligned. And
9 that's either on an old spectrum system or you align
10 them on a digital system. That's called -- that's
11 aligning on that. It's on the scope. And now those
12 scopes are digital. So you align the scope,
13 technically. After you align the scope, then you have
14 to align the lights with the scope so that it hits the
15 settings of the Chromakey system.

16 **Q. You would be able to, I think, through your**
17 **years of experience and exposure to these kinds of**
18 **videos -- you've seen them before, the most common type**
19 **of nose disappearing stuff -- you would be able to**
20 **produce to us examples of blue screen videos with noses**
21 **disappearing, just like Anderson Cooper's, right?**

22 A. I think I could probably find those.

23 **Q. Yeah, that's something that you could produce?**

24 A. I can't guarantee it, but that's pretty --
25 like, have you ever seen, like, the weather person and

1 they're, like, wearing the wrong colored tie and it does
2 that? I mean...

3 **Q. Absolutely. And so if they're wearing a blue**
4 **shirt, all of a sudden it looks like their shirt's**
5 **invisible, right, because it's the same color as the**
6 **blue screen, right?**

7 A. Or it might be set to green and then somebody
8 sets it blue and, you know -- or somebody hits it; and
9 it goes to brown and all of a sudden the rest of their
10 clothes disappear.

11 **Q. And the whole shirt disappears?**

12 A. There is a dial. You can dial it to any color
13 you want.

14 **Q. Okay.**

15 A. At least on those units, older units.

16 **Q. Okay. What kind do you have at InfoWars? You**
17 **said you have one in the back?**

18 A. Oh, we have quite -- most of them that we
19 have -- we probably have about ten of them.

20 **Q. Okay.**

21 A. The average news computer system has them.

22 **Q. You still have them, all ten of them?**

23 A. That's not an accurate statement. We probably
24 have 50.

25 **Q. You have 50 blue screen mechanical devices?**

1 A. No, I said I have blue screens still. They're
2 on all your major video editing software now.

3 **Q. Okay.**

4 A. And then we have -- somewhere we might
5 actually have an old-fashioned tube-based one. And I
6 say 50. Do we have 50 computers? I mean, we probably
7 have 50 computers, old and new.

8 **Q. Now, those blue screens -- in other words,**
9 **what InfoWars uses to create blue screens, that still**
10 **exists, is available for inspection, correct?**

11 A. Well, it's standard on Final Cut Pro. It's
12 standard on all those editing systems. Just you can go
13 to the store and buy them.

14 **Q. Okay. So whatever InfoWars has that it's**
15 **claiming gives it knowledge of how blue screens work,**
16 **that still exists; you haven't gotten rid of that stuff,**
17 **right?**

18 A. No. We've got a couple of green screens up on
19 the walls.

20 **Q. Perfect. Okay. One of the things that you**
21 **talked about -- remember we said we were going to put a**
22 **pin in it, about blue screens is one of the reasons that**
23 **you were suspicious about this interview and blue**
24 **screens is because CNN's got caught using blue screens**
25 **before, right?**

1 A. Uh-huh.

2 Q. And, in fact, one of the things you brought up
3 was about CNN getting caught using blue screens in the
4 Gulf War?

5 A. Uh-huh.

6 Q. On the satellite feeds, right?

7 A. Yes.

8 Q. Okay. I want to play you a video really quick
9 from something you said on May 13th, 2014 about these
10 blue screens.

11 MR. BANKSTON: Can you play CNN Blue
12 Screen for me?

13 (Video playing.)

14 Q (BY MR. BANKSTON) Now, Mr. Jones, you've seen
15 there was actually a satellite feed leak -- a leak of
16 this that you've seen, right?

17 A. Uh-huh.

18 Q. Okay. Is that a "yes"?

19 A. Yes.

20 Q. Okay.

21 (Exhibit 8 marked.)

22 Q. (BY MR. BANKSTON) Mr. Jones, I'm going to
23 hand to you what I've marked as Exhibit 8. You
24 recognize this leak from the Charles Jaco CNN broadcast
25 where he's got the blue screen behind him? You

1 recognize that?

2 A. Yes.

3 Q. Okay. And this was something that some people
4 recorded off of a satellite leak?

5 A. I believe so, a long time ago.

6 Q. Okay. And you've done some reporting about
7 this on InfoWars. You've shown this video and what
8 happened that day?

9 A. Yes.

10 Q. Okay. And as we see from here, you can see
11 kind of on the left-hand side and on the right-hand of
12 the screen, there's this big blue screen up behind them,
13 right?

14 A. Uh-huh.

15 Q. Right? Because they left it on. I mean, they
16 didn't put anything on it because they were on a
17 satellite kind of practice feed, I think, right?

18 A. I don't remember all the particulars, but they
19 admitted they weren't on location.

20 Q. Okay.

21 A. And then, again, it's not like the background
22 turns on. It's that the computer overlays it.

23 Q. Right. It's not like actually on the --
24 there's something up on the screen. The computer takes
25 care of that in postproduction?

1 A. Or does it live.

2 Q. Or does it live, right. Okay.

3 But that CNN studio, that setup -- what
4 I'm going to hand you now is what's been marked as
5 Exhibit 10.

6 (Exhibit 10 marked.)

7 Q. (BY MR. BANKSTON) Do you think ABC News and
8 Forrest Sawyer was given access to Ted Turner's secret
9 studio?

10 MR. BARNES: Objection as to form.

11 A. I don't even know anything about this. I
12 mean, I know they were...

13 Q. (BY MR. BANKSTON) You've never seen that
14 picture?

15 A. No. I believe that CNN and others, especially
16 CBS partners with other groups routinely; but that's
17 conjecture. I don't know.

18 Q. Okay. So I take it you've never done any sort
19 of research as to where these interviews were allegedly
20 done or CNN says they were done?

21 A. You know, this was so long ago. I remember
22 seeing PBS documentaries about this.

23 Q. Let me show you an exhibit about that.

24 (Exhibit 9 marked.)

25 Q. (BY MR. BANKSTON) I'm going to hand you now

1 what I've marked as Exhibit 9. You've never seen the
2 International Hotel in Riyadh, Saudi Arabia, have you?

3 A. No. I know that's where they said they were
4 broadcasting from.

5 Q. I'm going to show you what I'm marking as
6 Exhibit Number 11.

7 (Exhibit 11 marked.)

8 Q. (BY MR. BANKSTON) You've never seen the
9 photographs for the satellite setups for the major
10 networks at the International Hotel in Riyadh, Saudi
11 Arabia, have you?

12 A. Nope. I just know Jaco says that they staged
13 a chemical attack that didn't happen.

14 Q. You know that Jaco admits is what you're
15 saying? You've seen clips of Charles Jaco saying it
16 was --

17 A. Yeah, it came out later that there wasn't
18 nerve gas in the air and all that and that they staged
19 some of the shots on blue screen.

20 Q. So you're maintaining that that thing behind
21 them in that shot is a blue screen used for compositing
22 and not just the walls of the International Hotel in
23 Riyadh that was on every broadcast during that time?

24 MR. BARNES: Objection --

25 Q. (BY MR. BANKSTON) That's what you're saying?

1 MR. BARNES: Objection as to form.

2 A. Well, no. They were saying they were there.
3 They weren't saying they were projecting that behind
4 them. I get your confusion about the blue thing or my
5 confusion. This was a long time ago. It's not debated
6 that CNN staged location shots.

7 Q. (BY MR. BANKSTON) They didn't stage that
8 shot, did they? That shot was in front of the
9 International Hotel in Riyadh. That was not a staged
10 shot.

11 A. Yeah, they put the gas masks on through the
12 whole thing and then they stopped during the breaks and
13 it's all a big joke.

14 Q. I'm not really concerned with what they did on
15 the broadcast. You said that they were in a secret
16 broadcast center in Atlanta when they said they were in
17 Riyadh. You were wrong. That was false. They were
18 actually in Riyadh. You can admit that?

19 A. I can't say that.

20 Q. In fact, you don't know. When you were saying
21 that they were not in Riyadh, you had no idea?

22 A. I think you're mixing things together.

23 Q. Okay, Mr. Jones.

24 A. You're right. Colin Powell, the anthrax was
25 real. You're right. Nothing sticks.

1 Q. There was a lot of reporting during the Gulf
2 War, a lot of people doing really hard work to uncover
3 the fact that those aluminum tubes were total bunk.
4 That wasn't WMDs, right?

5 A. Were they wrong to question that.

6 Q. Absolutely. There was a lot of people
7 questioning that. They did some really good reporting.
8 They found out, for instance, that some of the
9 allegations of torture in Kuwait were total bunk; it was
10 total propaganda. Some good journalists found that --

11 A. The babies in the incubators?

12 Q. I think that's some of it, isn't it? Not just
13 the babies in the incubators, though. There was a lot
14 of false things being told to the American public to get
15 them to go to war, wasn't there?

16 A. Yeah.

17 Q. And a lot of reporters did really good work
18 doing it and finding out what those things were. There
19 were some really good reports, right, an incubator
20 report, for instance?

21 A. Yeah. Yeah. I was pretty young then, but
22 yeah.

23 Q. So those good journalists did good work
24 uncovering those facts; but your work on the blue screen
25 allegation in the Gulf War, that wasn't good journalism,

1 **was it, Mr. Jones?**

2 A. No. They admitted they did blue screen shots
3 from Atlanta and a whole bunch of places.

4 **Q. That's where you're doubling down; you're**
5 **saying that that's a fact?**

6 A. I'm saying you're mixing things together, so I
7 can't say anything further.

8 **Q. Okay. I want to talk a little bit --**
9 **actually, I want to go back to something you said**
10 **earlier, which is that you have CIA sources who told you**
11 **that something's up in Vegas --**

12 A. Yep.

13 **Q. -- something funny's going on in Vegas. Who?**

14 MR. BARNES: Objection, and we'll
15 instruct the witness not to answer on journalistic
16 privilege.

17 MR. BANKSTON: Gotcha.

18 **Q. (BY MR. BANKSTON) Well, what did you hear?**
19 **What did this person tell you?**

20 MR. BARNES: The same instruction not to
21 answer if it in any way will disclose their identity.

22 MR. BANKSTON: Yeah, I'm not asking for
23 their identity.

24 THE WITNESS: Go ahead.

25 **Q. (BY MR. BANKSTON) What did they tell you?**

1 A. I got contacted in the morning with -- I got
2 contacted by an individuals assigned to the SERF Teams
3 CIA Assassination squads who had people inside the
4 hostage rescue team in Vegas and they said that he was
5 selling weapons to the Gihadies and that they had
6 paraphernalia for the Gihadies in the Middle East, that
7 he was an arms dealer. I mean, the Saudis were having a
8 civil war.

9 They were having an event with the Saudi
10 military, over 10,000 of them in Las Vegas that weekend
11 as part of a larger event, and that as basically inside
12 the Saudi Arabia civil war that they used the arms deal
13 to get weapons inside of the United States and that they
14 then killed the patsy and then carried out the operation
15 and that the whole thing was basically a Saudi civil
16 war. And a lot of that later came out.

17 **Q. Came out where?**

18 A. It came out in the news that he went to the
19 Middle East. It came out that he had been involved in
20 arms dealing. And I also had to sign nondisclosures
21 that I can't get into subsequently with other
22 information.

23 **Q. You've signed nondisclosures?**

24 A. Uh-huh.

25 **Q. With whom?**

1 A. I can't talk about it.

2 Q. Okay. Well, what about: What's the general
3 topic that you can't disclose?

4 A. I can't talk about it.

5 Q. Okay. So apparently there's some
6 nondisclosure agreement that you've signed with some
7 unnamed person that is relevant to the allegations that
8 you were making about Las Vegas?

9 A. Yes.

10 Q. Okay. And you can't -- for reasons of that
11 nondisclosure, you can't disclose anything about that
12 today?

13 A. No, I can't.

14 Q. Was that a government person that you did the
15 nondisclosure with?

16 MR. BARNES: Objection, and we'll
17 instruct the witness not to answer to the degree it
18 could disclose his identity, which that question
19 basically would.

20 Q. (BY MR. BANKSTON) Was it a corporate entity?

21 MR. BARNES: The same instruction not to
22 answer on the grounds of the journalistic privilege
23 shield as something that may identify or lead to the
24 identification of the individual person.

25 Q. (BY MR. BANKSTON) Was it a real person or an

1 **imaginary person?**

2 A. Oh, it's real.

3 **Q. It's a real person. So there is a contract.**

4 **If we needed it, we could get it? It exists? Do you --**

5 A. I already told you it exists.

6 **Q. Do you own a copy?**

7 THE WITNESS: We have a copy of that,
8 don't we?

9 MR. BARNES: Well, he's just asking
10 whether you --

11 A. Yes, we have a copy.

12 **Q. (BY MR. BANKSTON) Okay. Thank you,**
13 **Mr. Jones.**

14 **Let's talk a little bit about sources.**
15 **What is InfoWars' policy on using unnamed sources?**

16 A. If they've been credible in the past and have
17 been good sources, then we report from an unnamed
18 source.

19 **Q. Who is in charge or makes the decision on if**
20 **the source is credible?**

21 A. Paul Watson, myself, Rob Dew.

22 **Q. Okay. You talked a lot about covering**
23 **Internet --**

24 A. Let me be clear: Paul does his own thing. So
25 he does his reporting and then helps us out with other

1 stuff.

2 Q. Okay. So it's you and Rob who assign
3 credibility to sources?

4 A. Yes.

5 Q. Okay. You talked a bit about covering the
6 Internet and what's being said on the Internet. On when
7 you cover the Internet and the stuff that's being said
8 there, are there particular places that you consider
9 important places to look on the Internet for what's
10 really being said and what's happening?

11 A. Yes.

12 Q. What are some of your primary sources on the
13 Internet to get Internet chatter?

14 A. I mean, everything from the Intercept to the
15 New York Times to Drudge Report to CNN -- I mean, we
16 just look at everything -- to the Congressional Record.

17 Q. Well, I mean, I understand you look at media,
18 mass media and government reports; but I'm talking about
19 Internet chatter, what the people are talking about
20 online. How do you get a pulse of that?

21 A. It's not even getting a pulse. In the past we
22 would cover whatever the big chatter was if I thought it
23 was interesting and the crew did. We basically try not
24 to even do that anymore because it always gets assigned
25 on us when we cover even big stories because if, like,

1 CNN takes the angle on Pizzagate and makes it huge --
2 Washington Post, New York Times, CNN -- they make
3 whatever they're reporting on the huge thing; and then
4 we go report on this huge thing that the media, the
5 corporate media, actually went, like, a honey pot and
6 set up. So more and more I try to not even report on
7 whatever the big thing on 4chan or, you know, any of
8 these sites are talking about. I directly stay away
9 from them now.

10 Q. Okay. 4chan, let's just pick that one up
11 first.

12 A. Yes.

13 Q. That's an anonymous image board, right?

14 A. Yes.

15 Q. The posters there are assigned a random
16 number, right?

17 A. Yes.

18 Q. InfoWars has frequently used 4chan as a
19 source?

20 A. We've reported on things being reported at
21 4chan.

22 Q. As a source, right? That's what a source is,
23 isn't it?

24 A. Yes.

25 Q. Okay.

1 A. I mean, if somebody was e-mailing you, you
2 could say technically it was a source --

3 Q. Sure.

4 A. -- even if you never even open it.

5 Q. Any piece of information that you're going to
6 report secondhand is a source, right?

7 A. Yeah.

8 Q. It was the source of that information?

9 A. Yeah. Like, if somebody draws on a bathroom
10 wall, it could be a source.

11 Q. Now, for instance, one of the things we've
12 talked about is misidentifying the Parkland shooter. We
13 talked earlier about misidentifying the Parkland shooter
14 last year. InfoWars' source was 4chan, right?

15 A. I don't remember that, but we corrected it
16 within a day.

17 Q. Well, I mean, I didn't ask you anything about
18 correction, right? What I'm asking is: Do you or do
19 you not know if 4chan was your source?

20 A. I believe it was one of the places that put it
21 up.

22 Q. Okay.

23 A. That's why I told --

24 Q. So that's what I was kind of asking when I
25 say: Where do you get your chatter? 4chan is one. Do

1 **you have any others for us?**

2 A. Yeah, e-mail, what people are talking about on
3 the street.

4 Q. Well, I mean, specifically we're talking about
5 honing in on this idea that there were people on the
6 Internet chattering about Sandy Hook. The Internet was
7 talking about it. You know --

8 A. I would say YouTube. The videos within the
9 first two weeks with, like, 5 million, 10 million views,
10 plus; and they were showing a lot of things that when
11 you looked at it, looked pretty compelling.

12 Q. Okay. So there were people making videos on
13 YouTube. You had some of those people on your show,
14 right?

15 A. I'm not -- I can't remember.

16 Q. Okay. You know who Q.K. Ultra is? Have you
17 heard that name?

18 A. (No audible response.)

19 Q. Do you know who the Independent Media
20 Solidarity Group is? Have you ever heard that name?

21 A. No.

22 Q. Do you know Peter Klein and his film, Let's
23 Talk About Sandy Hook?

24 A. No.

25 Q. Do you know the book Nobody Died at Sandy

1 Hook?

2 A. I've not read it.

3 Q. Okay. All of these things have been sources
4 for you, though, right?

5 A. No, I don't think Fetzer, by the time he wrote
6 that book, was a source.

7 Q. There was a broadcast with Mr. -- discussing
8 Mr. Heslin in 2017 about his statements on the Megyn
9 Kelly show. Do you know what I'm talking about?

10 A. Can you give me specifics?

11 Q. Yeah, you were sued over it by Mr. Heslin. Do
12 you know what broadcast I'm talking about now?

13 A. Well, I mean, what specifically?

14 Q. Mr. Jones, do you understand that Neil Heslin
15 sued you? Do you understand that?

16 A. Well, you're asking me about a specific
17 broadcast; and I'm saying: What broadcast?

18 Q. Right. First, I'm asking you: Do you
19 understand Neil Heslin sued you?

20 A. Yes.

21 Q. Okay. Are you telling me that you don't know,
22 sitting here right now, what broadcast he sued you for?

23 A. I mean, I'm asking you to give me the
24 specifics, like, so you can get me to comment.

25 Q. No, I'm asking you right now. That's what I

1 want to know a question to. Do you even know what
2 Mr. Heslin sued you for?

3 MR. BARNES: Objection as to this being
4 outside of the scope.

5 MR. BANKSTON: He's an individual.

6 THE WITNESS: This is Scarlett Lewis,
7 right?

8 MR. BANKSTON: Right. There's no
9 30(b)(6) Notice here. He don't have a scope.

10 MR. BARNES: Sure there is.

11 MR. BANKSTON: If he has personal
12 knowledge, he can answer it. Are you instructing him
13 not to answer?

14 MR. BARNES: It's an objection.

15 Q. (BY MR. BANKSTON) Okay. Then you can go
16 ahead and answer, Mr. --

17 MR. ENOCH: Well, don't tell him there's
18 no scope, Mark.

19 MR. BANKSTON: I have no idea, Mr. Enoch,
20 what you mean. Is there something in the Order that you
21 think there's a scope? I don't see a scope.

22 MR. ENOCH: The Court said you were
23 allowed to ask things consistent with your RFPs.

24 MR. BANKSTON: Yeah, whether Mr. Heslin
25 was defamed is relevant to my case. You know that. The

1 document request was all about Mr. Heslin.

2 MR. ENOCH: I --

3 MR. BANKSTON: Don't even start this with
4 me.

5 MR. ENOCH: Let me finish, please.

6 MR. BANKSTON: I would rather you not
7 because you're not defending this deposition, Mr. Enoch.
8 I've had an extraordinary amount of patience with you
9 speaking during this deposition, but we're not going to
10 do this to you when we defend depositions.

11 MR. ENOCH: Do not misrepresent to this
12 lawyer that the Judge did not restrict the scope to the
13 limit -- limited to the RFPs. Do you agree that he
14 limited it to that?

15 MR. BANKSTON: No, I don't think so --

16 MR. ENOCH: Okay.

17 MR. BANKSTON: -- not to an RFP, no, I
18 don't think so.

19 MR. ENOCH: You don't think so?

20 MR. BANKSTON: No, Mr. Enoch, I don't
21 think the scope of written discovery on a Request For
22 Production was identical to the scope of deposition.
23 And many, many times, Mr. Enoch, the Judge said, "No,
24 you can't ask that question for a Request For
25 Production; but you can just ask it in deposition." So,

1 no, I don't agree with you at all; and I would
2 appreciate it if kept quiet for the remainder of the
3 deposition. You are not defending this deposition.

4 MR. ENOCH: Mr. Bankston, I will speak if
5 it's appropriate for to speak.

6 MR. BANKSTON: It is not appropriate for
7 you to speak.

8 MR. ENOCH: Please don't interrupt me,
9 sir. That's not courteous.

10 MR. BANKSTON: Sir, I'm going to ask you
11 to leave my deposition.

12 Go off the record for a second.

13 MR. ENOCH: No, I do not agree to go off
14 the record.

15 MR. BANKSTON: All right. Don't go off
16 the record.

17 Mr. Enoch, I'm asking you to leave my
18 deposition. You are being obstructive. You are
19 talking. You are not appearing at this deposition. You
20 are not defending it. If you do not agree to be quiet,
21 I'm asking you to leave the deposition. Are you going
22 to stay and be quiet, or am I going to have to ask you
23 to leave?

24 MR. ENOCH: Mr. Bankston, I am not
25 leaving the deposition.

1 MR. BANKSTON: Then you're going to stay
2 quiet.

3 MR. ENOCH: Would you like to continue
4 your deposition?

5 MR. BANKSTON: I am. And if you leave
6 again -- if you keep speaking, I guarantee you I will
7 seek sanctions against you, Mr. Enoch.

8 Q (BY MR. BANKSTON) Mr. Jones, does --
9 interactions with readers and viewers, that tends to
10 help drive what you do on the show, right?

11 A. Somewhat.

12 Q. I mean, if viewers want you to cover
13 something, that's a motivator for you to cover it?

14 A. Sometimes. Not so much.

15 Q. And, in fact, you've said about Sandy Hook,
16 "This is what our viewers wanted us to cover. That's
17 why we were covering it."

18 A. Yes, it was an Internet sen -- a big deal
19 early on.

20 Q. And, in fact, when you weren't covering it so
21 much, whenever you stopped covering it for a little bit,
22 your viewers would get upset. And they'd be like, "Why
23 aren't you covering Sandy Hook; it's a hoax"?

24 A. Yes, people, the public -- the public in
25 general had major questions. I mean, even the Hartford

1 Current did. They said that they'd never seen stuff
2 covered up like this.

3 **Q. Right.**

4 A. I mean, I knew FBI agents and people that
5 said there was something weird going on with it.

6 **Q. One of them was his uncle, right?**

7 A. Yes, Rob Dew's uncle, right.

8 **Q. Yeah. He was up there with Mr. Halbig and**
9 **Mr. Bidondi and Mr. Reich.**

10 A. We didn't even know he was going.

11 **Q. Right. I'm not saying you did. I'm saying he**
12 **was up there?**

13 A. Yep.

14 **Q. Yeah.**

15 A. Career, retired FBI, yep.

16 **Q. Right. With Mr. Halbig and Mrs. Kay Wilson,**
17 **Mr. Bidondi --**

18 A. There was a big City Council meeting there.

19 **Q. Yeah. Mr. Reich was there?**

20 A. I don't know who those folks are.

21 **Q. Okay. Now, Mr. Dew, he has been frequently**
22 **sent as the news director of InfoWars -- hold on. Let**
23 **me back that up because I'm making an assumption.**

24 **Mr. Dew's the news director of InfoWars?**

25 A. For some of the programs. We don't do the

1 nightly news anymore; but he was directing those shows,
2 yes.

3 Q. Okay. So Mr. Dew had been, over the years,
4 sent e-mails and communications and tweets from Sandy
5 Hook debunkers. Do you know what I mean when I say
6 that?

7 A. Yes.

8 Q. Okay. And Mr. Dew had been told by these
9 people, "What you're saying is wrong. You need to stop
10 saying it. Here's the real truth"? You understand --

11 A. Oh, I thought you meant debunkers debunking
12 the official story.

13 Q. No, I mean those who were debunking what you
14 were saying about Sandy Hook.

15 A. Yes, and then we would offer for them to come
16 on air and cover what they said.

17 Q. And, in fact, you had been given information
18 by them; they had given you information?

19 A. And we put it on air.

20 Q. And you had a debate with a guy named Keith
21 Johnson, right?

22 A. I don't think I did.

23 Q. Well, okay. So there was a debate hosted on
24 InfoWars between Keith Johnson and Mr. Halbig?

25 A. Was that the -- I forget the name of the

1 newspaper guy. I can't remember the name.

2 Q. Well, Keith Johnson, he's a former InfoWars
3 contributor, right?

4 A. Well, there's a lot of articles that people
5 contribute, whether a letter to the editor or --

6 Q. That's not what I'm not talking about,
7 Mr. Jones. Keith Johnson was a paid contributor to
8 InfoWars?

9 A. Not to my memory.

10 Q. Okay. So there was this debate that Mr. Dew
11 hosted, and would you agree with me that was sometime
12 around 2015?

13 A. I don't remember.

14 Q. Okay. Mr. Dew, in addition to those debates,
15 has been provided written information from a lot of
16 these debunking people seeking to stop the allegation
17 that it's a hoax. You would agree with that?

18 A. Yes. There was a big Internet fight going on,
19 and we were showing both sides.

20 Q. Right. And so in terms of information about
21 these anomalies, some of the things that I've been
22 showing you today were in Mr. Dew's possession, correct?

23 MR. BARNES: Objection as to form.

24 A. I don't understand. There's been an ongoing
25 debate back and forth on these issues.

1 **Q. (BY MR. BANKSTON) Okay. Do you know who a**
2 **person named C.W. Wade is?**

3 A. No.

4 **Q. Okay. You've never heard of that person's**
5 **debunking efforts about what you've been saying?**

6 A. I've told you, like, I don't live, eat,
7 breathe, sleep, this stuff.

8 **Q. I get you. I'm just asking questions.**

9 A. I'm just really -- if I had it all over to do,
10 I'd do a better job; but I didn't do it on purpose be
11 malicious. And everybody wanted to have debates about
12 it; and I said years ago -- probably, like, five years
13 ago I said, "No more of this. I'm sick of it. It's a
14 tar baby. I think it probably happened."

15 But then we'd see stuff in the cover-up
16 and them never releasing documents and the Hartford
17 Current saying, "It looks like a cover-up's going on.
18 We don't think it's a hoax; but, you know..."

19 And so it's just a tar baby. I'm sick of
20 it. And so that's why there's so many apologies and
21 statements that I'm sorry, you know, that I was even
22 ever covering it because I don't want it to be my
23 identity. I'm tired of it.

24 **Q. What question are you answering?**

25 A. I mean, I'm answering your question about, you

1 know, these debates in this; and I'm trying to state --
2 what I'm saying is we invited everybody on. We had
3 debates. And if I remember that debate correctly, isn't
4 that when Halbig really got mad was because we pretty
5 much, you know, disagreed with him?

6 MR. BANKSTON: Can you scroll up?

7 (The reporter complies.)

8 THE WITNESS: I mean, I'm really trying
9 to be helpful.

10 Q. (BY MR. BANKSTON) Mr. Jones, I asked you: Do
11 you know C.W. Wade?

12 A. I don't know him, no.

13 Q. Thank you, sir.

14 I want to talk a little bit about
15 InfoWars, LLC. Have you ever taken money from InfoWars,
16 LLC?

17 MR. BARNES: Objection. And my
18 instruction is to privacy. Unless it's Sandy Hook
19 specific or relevant, I'll instruct the witness not to
20 answer consistent with the constitutional right to
21 privacy protected under both the Texas Constitution and
22 the United States Constitution.

23 MR. BANKSTON: Wow. Okay. We'll take
24 that up another day, I guess. Wow.

25 MR. BARNES: I mean, I can go to other

1 cases if you want me to.

2 MR. BANKSTON: I mean, I don't at all,
3 Mr. Barnes.

4 Q. (BY MR. BANKSTON) InfoWars, LLC, has it ever
5 had any money?

6 MR. BARNES: Objection, same instruction
7 to the witness not to answer on the grounds of privacy.

8 Q. (BY MR. BANKSTON) What is InfoWars, LLC?

9 A. I don't believe it's even an operating
10 company.

11 Q. So it's your allegation it's not an active
12 corporation by the Secretary of State?

13 A. You know, I'm not the expert on this. So I
14 probably shouldn't answer it because I don't want to
15 state it wrong, but I...

16 Q. Okay. You made InfoWars, LLC; you created it?

17 A. You know, I'm not one of the lawyers. So I
18 don't want to answer it wrong.

19 Q. Nobody else is involved. It's nobody else's
20 company, right?

21 MR. BARNES: Objection and instruct the
22 witness not to answer on the grounds of privacy that
23 could also invade the privacy of third parties.

24 MR. BANKSTON: Okay.

25 Q. (BY MR. BANKSTON) InfoWars, LLC, what does it

1 **do? What has it ever done as a business?**

2 A. I don't know.

3 **Q. Okay. Do you have any job duties at InfoWars,**
4 **LLC?**

5 A. I mean, as you heard, I'm not going to get
6 into structure of things. Plus, I'm not a CPA or a
7 lawyer. I don't want to say it wrong.

8 **Q. Okay. Have you ever had job duties at**
9 **InfoWars, LLC in the past?**

10 A. I don't want to say -- I mean, I think I'm the
11 only -- it's -- I'm the sole person.

12 **Q. Has InfoWars, LLC ever had an office?**

13 A. I really don't understand. I don't know what
14 you're getting at.

15 **Q. Do you know what an office is?**

16 A. No, I don't understand. Like, you're asking
17 me whether a corporation has an office.

18 **Q. Uh-huh.**

19 A. The company has offices at Free Speech
20 Systems.

21 **Q. Well, so if I was to ask you: Does Free**
22 **Speech Systems have an office, the answer's "yes"?**

23 A. I think, yeah, it's on the letterhead, yeah,
24 that's what...

25 **Q. Okay. Let's try InfoWars. Does InfoWars, LLC**

1 **have an office?**

2 A. You know, I don't want to inaccurately answer
3 that, so I can't.

4 **Q. Okay. Who would be the person at InfoWars,**
5 **LLC who could answer that?**

6 A. You know, the corporation got set up a long
7 time ago; and I'm not sure who you'd ask those
8 questions.

9 **Q. Okay. Now, when it comes to Free Speech**
10 **Systems, LLC, you're the boss?**

11 A. Uh-huh.

12 **Q. There's nobody with more power at Free Speech**
13 **Systems, LLC than you?**

14 A. I make all the major decisions. I'm the --
15 the buck stops with me.

16 **Q. You make final call on anything that goes to**
17 **air?**

18 A. I mean, I don't sit there and watch over
19 everything. I try to have good people that are smart
20 and are trying to tell the truth.

21 **Q. But, I mean, you have the authority. If**
22 **something's going to air and you find out and you don't**
23 **want it on air, you can stop it?**

24 A. Yes. I told you: The buck stops with me.

25 **Q. Okay.**

1 THE WITNESS: Can I have a water, please?

2 Thanks.

3 MR. ENOCH: Sure. There's not an extra

4 cup.

5 THE WITNESS: It's fine.

6 MR. ENOCH: I'll just give you a coffee

7 cup.

8 THE WITNESS: Thank you.

9 Is it okay to break for ten minutes and
10 eat?

11 MR. BANKSTON: Yeah. You know what, this
12 is not a bad spot. We're at 3:30 right now.

13 THE WITNESS: Thanks. All I need is ten
14 minutes.

15 MR. BANKSTON: Ten or fifteen is fine. I
16 mean, if we can come back here by 3:50, I can get us out
17 of here before 5:00.

18 THE VIDEOGRAPHER: Off the record at
19 3:29 p.m.

20 (Off the record from 3:29 to 3:42 p.m.)

21 THE VIDEOGRAPHER: We're back on the
22 record at 3:42 p.m.

23 Q (BY MR. BANKSTON) When was the last time you
24 did anything for InfoWars, LLC?

25 A. I'm sorry. I can't accurately answer that.

1 **Q. Was InfoWars, LLC in the news business?**

2 A. I don't think I can accurately answer that.

3 **Q. We've talked a lot about Free Speech Systems**
4 **employees today, like Mr. Dew. Did Mr. Dew ever do**
5 **anything for InfoWars, LLC?**

6 A. InfoWars, LLC's a real corporation. It's
7 inactive. And it was set up to deal with something like
8 intellectual properties or something, like, ten years
9 ago; and that was just kind of like a basic corporate
10 structure. It's pretty standard, I'm told; but I'm not
11 a lawyer. And so -- but, I mean, it's filed with the
12 State. It's up to date. It's just not -- I think the
13 things we were going to do with it we never did fully.
14 I think that's -- but I'm not a lawyer, but that's the
15 best of my understanding of that.

16 MR. BANKSTON: Object as nonresponsive.

17 **Q. (BY MR. BANKSTON) I asked you if Mr. Dew had**
18 **ever done anything for InfoWars, LLC. Is that "yes" or**
19 **"no"?**

20 A. I don't believe so.

21 **Q. Okay. What about -- help me with this name --**
22 **Tim Fruge?**

23 A. "Fruge."

24 **Q. "Fruge." Did Tim Fruge do anything for**
25 **InfoWars, LLC?**

1 A. No.

2 **Q. Does InfoWars, LLC have anything to do with**
3 **the InfoWars, LLC website?**

4 A. I don't want to state it wrong, but I think
5 so. Yeah, I think that's the whole point is that
6 different things had a different company.

7 **Q. Okay. Regarding sourcing, would you put**
8 **information on the air from a source if nobody at**
9 **InfoWars knew their identity?**

10 A. No, not generally.

11 **Q. Okay. And that's because if you can't verify**
12 **their identity of who's telling you the information, you**
13 **can't assess its credibility, can you?**

14 A. Well, if we got an anonymous call that there
15 had been a gas explosion in South Austin, we'd go see if
16 that was the case or if we looked up and saw smoke, not
17 that I'd normally cover something like that; but we've
18 actually got calls like that before.

19 Like, the morning of 9/11 I got a call,
20 "Hey, have you seen that something flew into The World
21 Trade Center?"

22 **Q. Sure.**

23 A. I mean, it was just -- so it's not -- I'm
24 trying to answer the question simply. But if somebody
25 calls up and say somebody's a bank robber and there's no

1 evidence of that, we don't cover it. 99 percent of the
2 time we report on what is already in the news or
3 something that's said in Congress or something that is
4 already out there and we just give our comment on it.

5 Q. Let me go back to your example. Say you got
6 an anonymous call that in South Austin there'd been an
7 explosion, right? You would take steps to confirm that
8 that explosion had occurred? Send somebody over there?

9 A. Yes.

10 Q. And in corroborating, once you were -- felt
11 confident that there was an explosion, then at that
12 point you should notify the public because that could
13 save lives, couldn't it?

14 A. Sure, yes.

15 Q. Okay. Now, if an anonymous person called you
16 and told you that there was an explosion and you didn't
17 send anybody out to go confirm the explosion, reporting
18 the explosion on the air could cause problems, correct?

19 A. Yes.

20 Q. Okay. Let me just ask you really quick going
21 back to this nondisclosure agreement that we discussed
22 earlier that you can't tell me about the identity or the
23 subject matter. Okay? I do want to know: What did you
24 agree to do?

25 A. I can't get into the specifics of the

1 nondisclosure agreement. You were asking sources on
2 Vegas, and we have particularly good ones on that.

3 Q. Okay.

4 A. And then...

5 Q. But in terms of your legal obligations, that's
6 also something you're not prepared to talk about today?

7 A. Yes. I had to sign a nondisclosure agreement
8 before I was allowed to see something.

9 Q. Okay. I want to ask you a little bit more
10 about Wolfgang Halbig. Now, Wolfgang Halbig was a
11 former security officer at a school, correct?

12 A. Yes.

13 Q. He has sold security plans and security
14 consulting services across the nation, correct?

15 A. Yes.

16 Q. He was one of the -- you would agree with me
17 he was one of the most aggressive people in trying to
18 publicize the idea that Sandy Hook was a fake?

19 A. Yes.

20 Q. How did you meet?

21 A. I never met him -- well, no. I don't know if
22 he's ever been in the studio. I've never met him. It
23 all blurs, with Skype or audio; but I don't remember.

24 Q. So your conversations with him generally
25 aren't face to face?

1 A. They were on air.

2 Q. On your radio or web show, you mean? Those
3 are the places you would typically talk to Wolfgang?

4 A. Yes, uh-huh.

5 Q. Did you ever communicate in any other ways?

6 A. I vaguely remember talking to him on the phone
7 a couple of times.

8 Q. Okay. Do you think you've ever e-mailed
9 Wolfgang Halbig?

10 A. I think we've responded back to his e-mails,
11 yes.

12 Q. Okay. And he's e-mailed people on your staff?

13 A. A lot.

14 Q. A lot. What did you do to vet him? How did
15 you assess his credibility?

16 A. We looked him up and he'd been on national
17 television as an expert and he'd been with the state
18 police and then he'd been a security -- head of security
19 at a school. And at first a lot of what he said
20 sounded -- he was more credible, and I think he
21 genuinely believed what he was saying. And then he had
22 that professor coming out from Florida -- I forget his
23 name -- and just a bunch of other people. It was just a
24 big firestorm on the Internet and we covered that
25 firestorm and I gave my opinions on it.

1 **Q. So what I think I'm hearing from you is he's**
2 **been on TV? He was --**

3 A. Well, no. I mean, he was a state police
4 officer and then he was the head of school security at a
5 school and then he was a nationally recognized -- as
6 least according to the big national shows I saw, I guess
7 that were mainstream; they must have vetted it -- that
8 he was this really big credible guy.

9 **Q. So are you saying that he had a resume of such**
10 **that you did not feel the need to fact-check or**
11 **corroborate his allegations?**

12 MR. BARNES: Objection as to form.

13 A. We did try to fact-check it; but because there
14 was such a wall of secrecy up around it, around Sandy
15 Hook, that the Hartford Current and others noted,
16 unprecedented, that allowed that darkness for, you know,
17 things not to be checked out.

18 **Q. (BY MR. BANKSTON) Well, let's take them one**
19 **by one. Mr. Halbig said the thing about the**
20 **Port-A-Potties, right? Do you know what I'm talking**
21 **about, the Port-A-Potties?**

22 A. Yes.

23 **Q. Okay. That wasn't hidden behind a cloak of**
24 **secrecy. That's in a video that's been public for six,**
25 **seven years, right?**

1 A. Well, I don't think that that piece of
2 information has been proven one way or the other. I
3 think they did deliver Port-A-Potties pretty quick.

4 **Q. EMTs were in the building, right? And that's**
5 **been public for six or seven years.**

6 A. Most of those reports were blacked out.

7 **Q. You know EMTs were in the building? That's**
8 **borne out in multiple reports.**

9 A. In the report itself, the police officer said
10 it didn't look normal; things didn't look right. That
11 was the kind of thing we were reading.

12 **Q. Okay, Mr. Jones. You know about what**
13 **Mr. Halbig did up in Newtown, right? You know about his**
14 **activities there?**

15 A. Earlier you played the Bidondi tape. That was
16 Bidondi saying those things, you notice. So I'm not
17 sure what you're going to ascribe to me that I'm not
18 involved in. I don't know what Bidondi did in Newtown
19 after a certain -- after about a year or so.

20 **Q. You know he almost got arrested at the United**
21 **Way. You know about that, right?**

22 A. No.

23 **Q. You've talked about that on your show.**

24 A. I don't remember.

25 **Q. You don't remember what happened at the United**

1 **Way with Mr. Halbig?**

2 A. I don't remember some things I talked about
3 two weeks ago on my show.

4 Q. Definitely you don't remember him almost
5 getting in a brawl with a fireman at a firehouse in
6 Newtown?

7 A. No.

8 Q. You certainly knew he was harassing parents up
9 there?

10 A. No. I remember hearing that there were some
11 fracasas going on; and that's when I said, "I don't want
12 to have him on the show anymore."

13 Q. And then e-mailed about his associate,
14 Jonathan Reich, who was up there with Mr. Bidondi and
15 Mr. Halbig, getting arrested for harassing a Sandy Hook
16 parent? You knew about that?

17 A. Vaguely aback at the time.

18 Q. Yeah, you know who Jonathan Reich is, don't
19 you? That's been told to you plenty of times.
20 Mr. Halbig tried to get you to support his case, right?

21 A. He sent thousands of e-mails. I haven't read
22 any of them, really.

23 Q. You know who Lucy Richards is, don't you?

24 A. No.

25 Q. Even today, you don't -- sitting here today,

1 you don't know who Lucy Richards is?

2 A. I don't.

3 Q. Okay. You don't know that there was a woman,
4 an InfoWars follower, who went to Federal prison for
5 stalking and threatening to kill Sandy Hook parents and
6 that she's now barred from ever seeing InfoWars again by
7 court order?

8 A. I read about a woman and the media alleging
9 that.

10 Q. And you know that happened in central Florida
11 very shortly after you disclosed Mr. Pozner's personal
12 e-mail address and maps to where he picks up his mail;
13 you know that, right?

14 A. No, I do not.

15 Q. Okay. You didn't know where that occurred?

16 A. No, I did not do what you said I did.

17 Q. Okay. One of the things that you told me,
18 Mr. Jones, is that Sandy Hook has been one-tenth of
19 1 percent of what InfoWars covered, correct?

20 A. Yes.

21 Q. How did you determine that?

22 A. It's a dead reckoning. I mean, if you look at
23 four hours on average a day, five days a week, a couple
24 of hours on the weekend or more, probably three or four
25 every weekend, you add -- I mean, I've sat there and

1 added it up and talked to everybody around the office,
2 it's like we covered it. You know, somewhere it
3 happened and we're into it and then it was just all over
4 the Internet with debates back and we looked it up and
5 went over the videos and maybe there were part of maybe
6 20 shows or so. And then you look at some were, like,
7 usually 30 minutes to an hour; some were a little
8 longer. And then you add that to just the 300 and
9 something days a year we're on air -- 340 or so, I'd
10 say -- and you look at all that and you add it into all
11 the shows and everything and it's just, like, tiny.

12 And then once Hillary announces that it's
13 my identity, then the media kind of just took who I was
14 at InfoWars and applied it to everybody else; and then
15 just the whole thing became this big tornado. And, I
16 mean, I -- so in this instance it's been somewhat more
17 of me responding to it and things.

18 And then when the media was editing what
19 I was saying to make it look like I was, you know,
20 making statements that they wanted to be hearing so it
21 could be an ongoing thing.

22 And I really woke up when Parkland
23 happened and they said that I was saying nobody died and
24 they were all actors. I was like, "Whoa," because I was
25 dead clear on that when that happened. I just said they

1 picked the kids from the drama club that they
2 interviewed, saying, "We're in the drama club, and we're
3 anti-guns." And I said that they picked good-looking,
4 well-spoken people out of 3,000 who wanted to be the
5 spokespersons against guns. That didn't mean that the
6 event didn't happen.

7 And I did -- we did break that the police
8 stood down, and that's now come out. I don't know why
9 they stood down. We did point that out.

10 So I really was like: Whoa. You're not
11 going to say every mass shooting that happens that I'm
12 saying it didn't happen.

13 MR. BANKSTON: Can you scroll back to my
14 question?

15 (Reporter complies.)

16 THE WITNESS: That was the scary point
17 when every mainstream media was like -- I was like:
18 Wow, these people really are crooks.

19 MR. BANKSTON: Thank you.

20 Q. (BY MR. BANKSTON) Here's my question,
21 Mr. Jones: How in the world would you know how much
22 you've covered Sandy Hook, one-tenth of 1 per -- 10
23 percent [sic] when we, the Plaintiffs, have asked you to
24 produce us every video that has Sandy Hook in the title;
25 and you can't even do that? You haven't produced those

1 to us.

2 A. Videos from where?

3 Q. From you.

4 A. No, from after -- after you and other law
5 firms lobbied to have us taken off the Internet, which
6 had the index of it on YouTube and other platforms, like
7 Roku, "Oh, he's doing it right now. Get it off right
8 now. He's coming after the kids right now," knowing
9 full well that's not going on.

10 You're lobbying against the First
11 Amendment and you are then at the same time trying to
12 take down all of what I really said and then edit things
13 together and that's the only record. And we went and
14 looked. There's maybe 20 shows, maybe another probably
15 50 times callers calling up. That's what we know of.
16 I'm sure there's more we don't know about. And we added
17 all that together with a calculator and we looked at the
18 number and it's literally not even one -- maybe
19 one-tenth of 1 percent of all the air time we've done is
20 Sandy Hook.

21 Q. So you found some shows, 20 something shows
22 with Sandy Hook in it?

23 A. That's a dead reckoning, but yes.

24 Q. Why haven't you given them to me, Mr. Jones?

25 MR. BARNES: Objection and, in fact --

1 A. We have given you everything we could find.

2 **Q. (BY MR. BANKSTON) Because the truth is you**
3 **can't even search by title, can you? You don't have an**
4 **index. You have no idea, correct? You can't search by**
5 **title?**

6 A. No, but we have -- we -- well, actually, we do
7 have it. It's Prism planted on tv, and we can search.
8 And we searched all the names they had in the title, but
9 that doesn't mean that a caller didn't call in and it
10 didn't get said somewhere, but we've done the best we
11 can to go through all that stuff.

12 **Q. Really? If you go to tvinfowars.com and you**
13 **search Sandy Hook Vampires Exposed, that'll come up?**

14 A. tv.infowars.com is a defunct URL that pointed
15 at Prism planted, not tv.

16 **Q. Okay.**

17 A. So -- and you know that. We've put -- there
18 was a big deal about that.

19 **Q. Yeah, I just got sent a link that said --**

20 A. Okay. Well, let me -- listen. We've never --
21 we don't take our stuff down unless Twitter -- because
22 the lawyers on your side complain and say, "He's doing
23 this. Take it down." And then Twitter doesn't take
24 your stuff down; they order you to.

25 **Q. Uh-huh.**

1 A. Okay? But that's the same thing as taking it
2 down.

3 Q. And when that happened, Mr. Dew, when he tried
4 to preserve that, when he deleted that stuff --

5 A. No, we had it preserved when we did it.

6 Q. Yeah, but he said in his affidavit he lost
7 user comments, didn't he?

8 A. Those are us. Twitter's us, not user
9 comments.

10 Q. No, I know. There's user comments on your
11 Twitter threads, and they were lost when you deleted
12 them, weren't they?

13 A. You guys were the ones lobbying to have me
14 taken off the Internet.

15 Q. I'm not --- I don't care about any of that.
16 I'm just asking you: Were those deleted?

17 A. (No audible response.)

18 Q. Those comments are lost and will never be
19 recovered and Mr. Dew admits it.

20 A. Sandy Hook lobbied to have my Twitter taken
21 down. The whole thing was taken down.

22 Q. I know. And you didn't do anything to
23 preserve it before that happened, did you?

24 A. Oh, so you get it taken down; and then it's my
25 fault?

1 **Q. No. I'm asking you: When did -- you**
2 **reasonably anticipated litigation the moment you were**
3 **sued, right? When you were sued on April of 2018, you**
4 **knew that all that information was relevant, right?**

5 MR. BARNES: Objection, calls -- as to
6 form. Also objection to the degree any of the questions
7 are asking about attorney-client communications, then
8 you're instructed not to answer to disclose any
9 information that comes from attorney-client
10 communications.

11 **Q. (BY MR. BANKSTON) Let me ask it a different**
12 **way, Mr. Jones --**

13 A. We sent letters to Twitter and to Google
14 requesting that they not take us down and that they save
15 it. When they did, we said, "Please turn it back on or
16 give us the full records."

17 **Q. Let me make it very clear. After you were**
18 **sued, the information existed; it was available to you.**
19 **And then, later, it was deleted; and those comments are**
20 **gone. That's true?**

21 MR. BARNES: Objection as to form.

22 A. By Twitter. Twitter took the account down.

23 **Q. (BY MR. BANKSTON) Right. I understand that.**
24 **So before Twitter took that account down, you took no**
25 **efforts to preserve any of that information?**

1 A. Yes, we did. It's all -- I think that stuff's
2 saved on their site. The full service is to copy it.
3 What you're saying's not true.

4 **Q. And Mr. Dew admits that in his affidavit, that**
5 **InfoWars didn't save that in its local capture, it**
6 **didn't, right?**

7 MR. BARNES: Objection, calls -- as to
8 form.

9 A. I'm not an IT person. I can't accurately
10 answer all that.

11 **Q. (BY MR. BANKSTON) Okay. So in terms of**
12 **whether InfoWars failed to preserve evidence that might**
13 **be relevant to this claim, you're not the right person**
14 **to ask?**

15 MR. BARNES: Objection as to form.

16 A. I mean, I think despite the -- according to
17 effort by the media and universally establishment to
18 take all our content offline, we've done a pretty good
19 job of saving almost all of it at infowars.com and at
20 prismplay.com. So that's really not an accurate
21 statement.

22 **Q. (BY MR. BANKSTON) But you can't even search**
23 **it by title? You have no idea how many videos have**
24 **Sandy Hook in the title?**

25 MR. BARNES: Objection as to form.

1 Q. (BY MR. BANKSTON) We know there's videos of
2 Sandy Hook in the title that don't show up on these
3 planetinfowars searches, right? We know that.

4 MR. BARNES: Objection as to form.

5 A. There's no planetinfowars.

6 Q. (BY MR. BANKSTON) Whatever you want to call
7 it, Mr. Jones, you have a video archive that's up right
8 now, right? You have a video archive that's searchable
9 online. Do you agree or disagree?

10 MR. BARNES: Objection as to form.

11 A. Yes.

12 Q. (BY MR. BANKSTON) Okay. On that archive
13 there are videos that have been produced in this lawsuit
14 with Sandy Hook in the title that are not in that
15 archive?

16 A. Well, that's because you're getting other
17 people's videos offline. Like, you get them from Media
18 Matters and then you say that's our video and then you
19 want us to produce someone's edited video.

20 Q. Sorry, Mr. Jones. When you upload a video to
21 YouTube, you choose the title, don't you; or does
22 YouTube give you the title?

23 A. I don't think you understand.

24 Q. No. So let's take an example of a video.
25 Sandy Hook Narratives, False Narratives Versus the

1 Realty, a video that has that title should be showing up
2 in your archives, right? That's what you're saying?

3 A. The vast majority of videos of us are not us.
4 Other people get our videos and then put them together
5 with other things. You understand that.

6 Q. No, no, Mr. Jones, that's not what I'm saying.

7 Do you have Mr. Zipp's affidavit in front
8 of you? Hold on. No, in fact, Mr. Jones, I don't need
9 to make you run back through that. Let's not even worry
10 about it.

11 I've just got a couple more questions for
12 you, Mr. Jones. The year before you were sued, you said
13 that, "Everything I've heard is that the parents weren't
14 allowed to touch the children." Who did you hear it
15 from, and what did they say?

16 MR. BARNES: Objection as to form.

17 A. I don't know the specifics of what you're
18 talking about, so I don't want to state something
19 incorrectly.

20 Q. (BY MR. BANKSTON) Okay. So this statement,
21 everything you've heard is that the parents weren't
22 allowed to touch the children, you can't comment on that
23 today?

24 MR. BARNES: Objection as to the form.

25 A. I don't want to state it exactly -- I want it

1 to be exactly right or I don't want to state it. So
2 that's -- I mean, you say everything I've heard. I
3 don't know the specifics, but I remember complaints and
4 things that the parents couldn't get to their kids until
5 they'd been taken later to the morgue and things like
6 that.

7 Q. (BY MR. BANKSTON) Can you show me any one
8 human being in the world who told you the parents
9 weren't allowed to touch the children?

10 A. I believe that was in the newspapers.

11 Q. Okay. What about, "They're finding people in
12 the back woods that are dressed up in SWAT gear"?
13 That's not true, is it?

14 A. I saw it on the national news.

15 Q. You saw somebody in SWAT gear in the woods?

16 A. Yeah, black and camouflage. The police
17 arrested him and there was a SWAT drill in the area.

18 Q. No, Mr. Jones. I'm asking you: Did you see a
19 video of a man in SWAT gear being arrested?

20 A. I saw them -- the helicopter talking about
21 him, and they said they later arrested a man.

22 Q. So when you told your audience he was dressed
23 up in SWAT gear, that's just something you made up,
24 isn't it? There's nobody dressed up in SWAT gear?

25 A. I do remember that being on the news.

1 **Q. What being on the news?**

2 A. The helicopter and the man behind the school
3 and the report of the guy in the SWAT gear and the
4 police saying they arrested him, and later they said
5 they didn't.

6 **Q. Yeah, two reporters with cameras made reports**
7 **about that. There's no man in SWAT gear in that video,**
8 **is there? That's just something you made up.**

9 A. Nope, I didn't make it up.

10 **Q. So you think you can produce to me a video of**
11 **a man in SWAT gear in the woods?**

12 A. I remember that's what was being reported on
13 the news.

14 **Q. Okay. So now it's not you saw it in a video.**
15 **Now, it's somebody else saying it?**

16 A. But I remember seeing a guy and it looked like
17 in the video that he was in camo and black.

18 **Q. Okay. First of all, camo and black, what does**
19 **that mean? He had camo pants on?**

20 A. I mean, I would tend to think that means kind
21 of a paramilitary outfit.

22 **Q. Okay. So anybody you see who has camo pants**
23 **on when you're walking down the street, you're like:**
24 **That guy's paramilitary?**

25 MR. BARNES: Objection --

1 Q. (BY MR. BANKSTON) Is that your belief?

2 MR. BARNES: Objection as to the form.

3 A. I really -- I told you what my memory is.

4 Q. (BY MR. BANKSTON) Is it fair to describe any
5 gentleman wearing camo pants as being dressed in SWAT
6 gear? Do you think that's an honest and accurate way to
7 describe that?

8 MR. BARNES: Objection as to the form.

9 A. Yeah, I think that's a fair way to describe
10 it.

11 Q. (BY MR. BANKSTON) Oh, so you -- what I'm
12 trying to get at, Mr. Jones, is: You don't think saying
13 that a man who is dressed up in SWAT gear found behind
14 the school when he's not actually wearing any SWAT gear
15 is in any way alarmist or dangerous to say?

16 MR. BARNES: Objection as to the form.

17 Q. (BY MR. BANKSTON) Oh, you can answer,
18 Mr. Jones.

19 A. I mean, this is like seven years ago, so I'm
20 trying to remember. I mean, I remember seeing the guy
21 in looked like what I'd call police gear, kind of
22 paramilitary gear. I remember, like, camo and black or
23 something. I'm not -- again, I'm not living this every
24 day. I'm not -- and I -- and I'm very sad for folks,
25 you know, who have had to go through it and I'm sorry

1 for tragedies. And I kind of feel sorry for you having
2 to live through it all the time and knowing every detail
3 and every angle and everything else, but I just...

4 Q. It's hard.

5 Mr. Jones, what we were just talking
6 about, men being arrested in SWAT gear in the woods --

7 A. I don't think I said "men." If I said that, I
8 misspoke.

9 Q. Okay. Well, even if you said "man" in SWAT
10 gear in the woods, you said that just a year before you
11 were sued. That's not seven years ago, is it?

12 A. I was going over why people had -- the
13 anomalies -- some accurate, some not accurate -- why
14 people had questions.

15 Q. Yeah, but it's real recent, Mr. Jones. This
16 thing about, "Oh, it was seven years ago, I can't" --
17 that was just three --

18 A. I questioned Jussie Smollett just the day it
19 happened.

20 Q. And now --

21 A. That was just like a month ago.

22 Q. Exactly. And you know about that. You have
23 no memory problems there.

24 A. I'm proud of it.

25 Q. You just have memory problems when it comes to

1 **Sandy Hook?**

2 A. Well, seven years from now the specifics of,
3 like, if I've done 20 broadcasts on it --

4 **Q. Mr. Jones, this isn't seven years ago. I'm**
5 **asking you about 2017.**

6 A. I know; but is it okay to question Jussie
7 Smollett, or was that act evil?

8 **Q. Mr. Jones, I'm asking you about 2017. Was**
9 **2017 so long ago it's hard for you to remember?**

10 MR. BARNES: Objection as to the form.

11 A. I have gone over the anomalies, and I remember
12 seeing that footage and I -- that's why people
13 questioned.

14 **Q. (BY MR. BANKSTON) Who was involved in fact-**
15 **checking those anomalies? Tell me all the employees who**
16 **would be involved in that.**

17 A. All right. I think myself and Rob Dew and a
18 few others. Like I said, normally, we're just reporting
19 on news that's already out there. I'd say 98, 99
20 percent, it's just going: Hey, look this just happened.
21 Trump just said this. Hillary just said that. What do
22 you think?

23 **Q. Okay, Mr. Jones. You will admit to me that of**
24 **all these things that you have said, all the factual**
25 **claims you've made about Sandy Hook over the years, that**

1 if you were wrong about them, that it would be
2 reasonable to understand that the parents would be very
3 upset?

4 MR. BARNES: Objection as to the form.

5 A. I am not the only person who questioned Sandy
6 Hook, and I legitimately asked those questions because I
7 had concerns. And I resent the fact that the media and
8 the corporate lawyers and the establishment, the
9 Democratic party, who are trying to make this my
10 identity, brought it up, constantly repeated it, tricked
11 me into debating it with them so that they could say
12 that I was injuring people. And I see the parties that
13 continually bring this up and drag these families
14 through the mud as the real villains, the conscious
15 villains attempting to shore up the First Amendment in
16 the process. I do not consider myself to be that
17 villain.

18 I could have done a better job, in
19 hindsight, and I've apologized for that; but I've seen
20 the very same corporate media and lawyers continue to
21 say that I'm saying all these things and exaggerating
22 and using it against the First Amendment and I think
23 that's very dangerous and despicable.

24 Q. Mr. Jones, do you think I'm a corporate
25 lawyer?

1 A. Well, I know full well that when Hillary
2 Clinton lost the election is when all this started. And
3 I'm like, "Hey, I think Sandy Hook happened." And you
4 and others continually are in the news; and I remember
5 first in this lawsuit you were like, "All Jones needs to
6 do is say he's sorry to some parents." I'm like: I am
7 sorry that this has all been out of context and that
8 your kids died, and that was all ignored. So I've seen
9 the real disingenuousness and the fact that this is all
10 just a cold-blooded, you know, fit because Hillary lost
11 the election.

12 **Q. So do you think I work for Hillary Clinton or**
13 **something or George Soros gives me money or something**
14 **like that?**

15 A. Well, I mean, I know this: When Hillary lost,
16 the light switch went on. I'd never been sued, and I
17 got sued a bunch.

18 And then you've got all the corporate
19 media --

20 **Q. Wait, wait, wait.**

21 A. -- working in tandem. And I know you're
22 working with a Connecticut case and doing all that and
23 triangulating all that stuff. So let's not -- let's
24 not -- and there's going to be some other things coming
25 down the road where all that will come out.

1 **Q. When were you sued?**

2 A. I think it was early last year.

3 **Q. Yeah, like a year and a half after Hillary**
4 **Clinton lost, right?**

5 A. But they hadn't -- but they hadn't ever put
6 the final report out. You needed the report because
7 they never would put the report out.

8 **Q. What report?**

9 A. The report came out a month before you sued
10 me.

11 **Q. Okay, Mr. Jones. Wait. What report, who --**
12 **what --**

13 A. The official Sandy Hook report.

14 **Q. What entity issued this report?**

15 A. It was put out by the local, state, and
16 federal government.

17 **Q. So you are going to sit here today and deny**
18 **that there has been an official Sandy Hook report, books**
19 **of it, online since December of 2013?**

20 A. Oh, there have been some redacted reports put
21 out; but it was a big deal in -- it went up to the
22 Connecticut Supreme Court. It's a hugely litigated
23 situation of this thing being so suppressed.

24 **Q. Okay. So you and your attorney have appeared**
25 **on your show to talk about this entire lawsuit being a**

1 **conspiracy against you to take you down?**

2 MR. BARNES: Objection as to form.

3 **Q. (BY MR. BANKSTON) Correct?**

4 A. It's a conspiracy, as Clarence Thomas admits,
5 to get rid of New York Times versus Sullivan.

6 **Q. And you've called me and members of my law**
7 **firm devil people, correct?**

8 A. Not specifically, no.

9 **Q. Okay. You've made money from every single one**
10 **of these broadcasts we saw today, right?**

11 A. No. We actually lose money on really
12 controversial stuff. We can actually see it.

13 **Q. Oh, so you can produce that to me? You have**
14 **data on that?**

15 A. Absolutely. We'd love to.

16 **Q. Okay. And you have supplements you sell, too,**
17 **with these videos, correct?**

18 A. No, no. The advertisement's separate from the
19 news.

20 **Q. Well, I mean, in these news broadcasts, you**
21 **advertise the sale of supplements, right?**

22 A. The two don't go together.

23 **Q. How do you mean they don't go together?**
24 **You're talking about the news and you put the news down**
25 **and all of a sudden you're talking Bone Broth and male**

1 **vitality and fluoride-free toothpaste and everything**
2 **else.**

3 A. Well, if we're talking about WMDs --

4 Q. **Hold on, Mr. Jones. And then you put that**
5 **back down and you pick up the news and you start talking**
6 **about it in the same video, correct?**

7 MR. BARNES: Objection as to form.

8 A. Well, it's like saying the Super Bowl goes
9 to -- and then the Super Bowl has Budweiser ads on the
10 walls.

11 Q. **(BY MR. BANKSTON) Yeah, NBC makes money off**
12 **of its broadcasting, doesn't it?**

13 A. But, technically, that's not how -- our
14 advertising is separate from what is going on during the
15 program. We don't do product placement. And so, no,
16 the answer is: Sandy Hook, before I was ever sued, lost
17 money.

18 9/11 Truth lost me almost all my radio
19 stations and lost money.

20 Those type of really controversial
21 stands, people don't like them; and they have crippled
22 us before these lawsuits. And, I mean, in fact, we look
23 back and you can see where we're talking about Sandy
24 Hook and the listeners and everything goes down.

25 Q. **I mean, and really, if we look at this at the**

1 end of the day, I mean, really you're the victim, aren't
2 you?

3 A. No, but I've certainly learned a lot in the
4 process.

5 Q. You've learned how not to be a reckless
6 journalist, right?

7 MR. BARNES: Objection as to form.

8 A. Well, I think certainly I have experienced
9 real fake news, watching the corporate media lie in my
10 name and put things out that I never did, in a concerted
11 effort. So I've learned what I -- certainly the polar
12 opposite of what I want to be because I've never
13 consciously tried to lie or hurt people.

14 And I did not make money off saying 9/11
15 was an event where we allowed Saudis to attack us.
16 That's now come out. I lost 127 something stations. I
17 went down to about 30.

18 A lot of stations dumped us when we were
19 talking about Sandy Hook. So if the statement is I say
20 these things and do these things to make money, that is
21 not what we are doing. Money coming in is to fund the
22 operation, to promote really questioning things, and to
23 build an alternative system. And it doesn't mean then
24 when you're being an alternative system that you're
25 perfect, but that's basically where I stand on that.

1 Q. Okay. I just do want to make sure. It's not
2 a nonprofit situation; you're not doing this for the
3 charity of your own heart?

4 A. No, I'm not like the nonprofits, the whole
5 conspiracy where they're buying the college admissions
6 and they call that a charity or Hillary's foundation,
7 no, I'm not running anything like that.

8 Q. I have no idea what you're talking about,
9 Mr. Jones.

10 A. Where these people make millions of dollars on
11 their tax-free charities, I don't do that.

12 Q. Okay. So --

13 A. You were asking me if I was running a
14 nonprofit scam; and the answer is "no." What I do is I
15 pay taxes.

16 MR. BANKSTON: Mr. Jones, I think we're
17 about wrapped up today if you could give me just a small
18 break to make sure that we're all wrapped up, I think
19 we've got about 45 minutes left in the day; but I'm not
20 going to use it for you. I'm going to let you get out
21 of here.

22 THE WITNESS: I'm happy to.

23 MR. BANKSTON: I mean, hey, if you want
24 to stick around and talk, we can talk; but we might need
25 to do that off the record. We might not need to put

1 that on the testimony, but I'm happy to do that. But
2 let's take just a quick break, and why don't ya'll give
3 us about five minutes?

4 MR. BARNES: Okay.

5 THE VIDEOGRAPHER: We're off the record,
6 4:14 p.m.

7 (Off the record from 4:14 to 4:28 p.m.)

8 THE VIDEOGRAPHER: We're back on the
9 record at 4:28 p.m.

10 Q (BY MR. BANKSTON) There's a couple of things
11 I was curious about, Mr. Jones. Do you think that
12 there's a question that I should have asked you today in
13 deposition that I didn't?

14 A. That's a good question. What question you
15 should have asked me. I can't think of any.

16 Q. Okay, Mr. Jones. You would agree with me that
17 when some damage happens, when you break something, when
18 you cause something to be lost, when you hurt somebody,
19 whether it's intentional or whether it's a mistake,
20 there's consequences for that, right? People should be
21 accountable for the people they hurt?

22 MR. BARNES: Objection as to form.

23 A. Well, sometimes people claim they've been hurt
24 when they haven't been. So you have to look at the
25 agenda behind things. You have to balance things about

1 why has the mainstream media lied so much, why our
2 Government's lied so much, the fact that the public
3 doesn't believe what they're told anymore, and are we
4 going to criminalize questioning Jussie Smollett or WMDs
5 or babies in incubators. And it really is the fact that
6 we've allowed the Government and institutions to become
7 so corrupt that people have lost any compass of what's
8 real.

9 And I, myself, have almost had like a
10 form of psychosis back in the past where I basically
11 thought everything was staged, even though I'm now
12 learning a lot of times things aren't staged. So I
13 think as a pundit, someone giving an opinion, that, you
14 know, my opinions have been wrong; but they were never
15 wrong consciously to hurt people.

16 And so I think it's part of that process
17 of me growing up in Rockwall, Texas and watching the
18 police deal drugs and then conduct anti-drug programs in
19 the school, I think that shook my opinion of police in
20 general. And I was very anti-law enforcement until I
21 grew up and learned more things, and now I'm pretty much
22 pro police. So it's been a process.

23 **Q. (BY MR. BANKSTON) You said false things about**
24 **Sandy Hook because it was psychosis?**

25 **A. I --**

1 MR. BARNES: Objection as to the form.

2 **Q. (BY MR. BANKSTON) Correct?**

3 A. Well, I'm just saying that the trauma of the
4 media and the corporations lying so much, then
5 everything begins -- you don't trust anything anymore,
6 kind of like a child whose parents lie to them over and
7 over again, well, pretty soon they don't know what
8 reality is.

9 So long before these lawsuits I said that
10 in the past I thought everything was a conspiracy and I
11 would kind of get into that mass group think of the
12 communities that were out there saying that. And so now
13 I see that it's more in the middle. All right? So
14 that's where I stand.

15 **Q. (BY MR. BANKSTON) And I'm little concerned**
16 **about something I heard in your answer, that it seemed**
17 **to be you suggesting that you weren't sure if these**
18 **parents have suffered pain from what you did.**

19 A. Well, I was stating that I was reporting on
20 the general questioning when others were questioning.
21 And, you know, it's painful that we have to question big
22 public events. I think that's an essential part of the
23 First Amendment in America. And I do not take
24 responsibility for the entire train of things that
25 lawyers and the media have said I've done. So I do not

1 take the responsibility. I do not take your indictment
2 or your presumed conviction of me as the villain or the
3 star of Homeland because that's not who I am. And so I
4 reject it.

5 **Q. Saying, "The school is closed and was closed**
6 **for years," that's not questioning. That's a statement**
7 **of fact, Mr. Jones, isn't it?**

8 MR. BARNES: Objection as to the form.

9 A. I was going off what other people were saying
10 and the fact that the records were not forthcoming and
11 the Hartford Current headlined: Why is There a
12 Cover-up? Why Aren't There Documents Being Released?
13 Why is it Taking so Long?

14 **Q. (BY MR. BANKSTON) "The EMTs weren't allowed**
15 **in the building," that's not a question, Mr. Jones.**
16 **That's a statement, correct?**

17 MR. BARNES: Objection as to the form.

18 A. Again, that was my going off what someone else
19 who I believed to be a credible expert was saying.

20 **Q. (BY MR. BANKSTON) Mr. Jones, are you finally**
21 **prepared to admit that you have, indeed, caused these**
22 **families a substantial amount of pain? Are you prepared**
23 **to admit that?**

24 A. I am not prepared to sign on to whatever you
25 and the mainstream media make up about me.

1 MR. BANKSTON: All right, Mr. Jones.

2 That will have to be it. I will see you next time.

3 MR. BARNES: One thing I was going to do
4 is just put this on record, just to make it -- the
5 confidentiality part. Is that okay?

6 MR. BANKSTON: Oh, yeah, that's stating
7 you're designating on the trial court?

8 MR. BARNES: Yes.

9 MR. BANKSTON: Please go ahead.

10 MR. BARNES: So what we have is a
11 Protective Order for the 30 days following any
12 deposition, that the parties must treat all of the
13 deposition testimony and the exhibits and other
14 documents produced at any deposition as attorneys' eyes
15 only and so they're marked confidential until that time.
16 Thank you.

17 MR. ENOCH: So no designation of
18 confidentiality is being made today. We'll look at it.

19 MR. BANKSTON: Absolutely. The whole
20 thing's confidential right now.

21 MR. ENOCH: That is the order, and we
22 have 30 days to designate confidential thereafter.

23 MR. BANKSTON: Absolutely.

24 MR. ENOCH: Very well.

25 MR. BANKSTON: Okay. I think we're done.

1 THE VIDEOGRAPHER: We're off the record
2 at 4:33 p.m.

3 (Exhibit 12 marked.)

4 (Deposition adjourned at 4:33 p.m.)
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I, ALEX E. JONES, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

ALEX E. JONES

THE STATE OF _____)
BEFORE ME, _____, on
this day personally appeared ALEX E. JONES, known to me
(or proved to me under oath or through _____)
(description of identity card or other document) to be
the person whose name is subscribed to the foregoing
instrument and acknowledged to me that they executed
same for the purposes and consideration therein
expressed.

Given under my hand and seal of office on
this, the _____ day of _____, _____.

NOTARY PUBLIC IN AND FOR
THE STATE OF _____
My Commission Expires: _____

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CAUSE NO. D-1-GN-18-006623

SCARLETT LEWIS	*	IN THE DISTRICT COURT OF
Plaintiff	*	
	*	
	*	
VS.	*	TRAVIS COUNTY, TEXAS
	*	
ALEX E. JONES, INFOWARS,	*	
LLC, AND FREE SPEECH	*	
SYSTEMS, LLC,	*	
Defendants	*	53RD JUDICIAL DISTRICT

REPORTER'S CERTIFICATION
ORAL/VIDEOTAPED DEPOSITION
OF
ALEX E. JONES,
Taken on March 14, 2019

I, Debbie D. Cunningham, Certified
Shorthand Reporter in and for the State of Texas, hereby
certify to the following:

That the witness, ALEX E. JONES, was duly
sworn by me, and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the deposition transcript was
submitted on _____ to the witness
or to the attorney for the witness for examination,
signature, and return to me by _____;

That the amount of examination time used
by each party at the deposition is as follows:

1 BY MR. BANKSTON:

2 BY MR. ENOCH:

3 BY MR. OGDEN:

4 BY MR. BARNES:

5 That pursuant to information given to the
6 deposition officer at the time said testimony was taken,
7 the following includes counsel for all parties of
8 record:

9 COUNSEL FOR PLAINTIFF:

10 KASTER LYNCH FARRAR & BALL, LLP
11 1010 Lamar, Suite 1600
Houston, Texas
12 (T) 713.221.8300

By: Mark D. Bankston, Esq.
mark@fbtrial.com

13 AND
14 William Ogden, Esq.

15 COUNSEL FOR DEFENDANTS:

16 GLAST, PHILLIPS & MURRAY, P.C.
17 14801 Quorum Drive, Suite 500
Dallas, Texas
18 (T) 972.419.8300

By: Mark Enoch, Esq.
mkenoch@gpm-law.com

19 AND

20 BARNES LAW, LLP (PRO HAC VICE)
21 601 South Figueroa St., Suite 4050
Los Angeles, California
22 (T) 213.294.3006

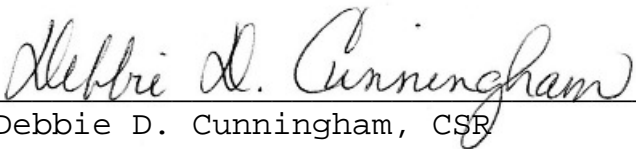
By: Robert E. Barnes, Esq.
barneslaw@barneslawllp

24 I further certify that I am neither
25 counsel for, related to, nor employed by any of the

1 parties or attorneys in the action in which this
2 proceeding was taken, and further that I am not
3 financially or otherwise interested in the outcome of
4 the action.

5 Further certification requirements
6 pursuant to Rule 203 of TRCP will be certified to after
7 they have occurred.

8 Certified to by me this day, March 25,
9 2019.

10
11 
12

13 Debbie D. Cunningham, CSR
14 Texas CSR 2065
15 Expiration: June 30, 2021
16 INTEGRITY LEGAL SUPPORT SOLUTIONS
17 3100 West Slaughter Lane, Suite A-101
18 Austin, Texas 78748
19 www.integrity-texas.com
20 512-320-8690; FIRM # 528
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FURTHER CERTIFICATION UNDER RULE 203, TRCP

The original deposition/errata sheet was / was not
returned to the deposition officer on _____;

If returned, the attached Changes and Signature
page contains any changes and the reasons therefor;

If returned, the original deposition was delivered
to MR. BANKSTON, Esq., Custodial Attorney;

That \$_____ is the deposition officer's
charges to the Plaintiff for preparing the original
deposition transcript and copies of exhibits, if any;

That the deposition was delivered in accordance
with Rule 203.3, and that a copy of this certificate was
served on all parties shown herein on _____
and filed with the Clerk.

Certified to by me on _____.

Debbie D. Cunningham, CSR
Texas CSR 2065
Expiration: June 30, 2021
INTEGRITY LEGAL SUPPORT SOLUTIONS
3100 West Slaughter Lane, Suite A-101
Austin, Texas 78748
www.integrity-texas.com
512-320-8690; FIRM # 528