

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

ANNA PAULINA LUNA,

Petitioner,

v.

WILLIAM BRADDOCK,

Respondent.

Case No.: 21-004904-FD

NOTICE OF FILING IN SUPPORT OF
PETITION FOR INJUNCTION

Petitioner, ANNA PAULINA LUNA., by and through her undersigned counsel, hereby provides Notice of Filing the Deposition Transcript of Respondent of August 20, 2021 in support of the Petition for Injunction and for an adverse inference in connection therewith and related thereto.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of September, 2021, this document was electronically transmitted to the Clerk of Court via the Florida Courts E-Filing Portal (“FCEP”) for filing and transmittal of electronic mailing to the following FCEP registrants:

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4818-5113-3433 v1 [94092-1]

In The Matter Of:
Anna Paulina Luna v.
William Braddock

William Braddock
August 20, 2021

Legal Realtime Reporting
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CASE NO.: 2021-004904-FD

ANNA PAULINA LUNA,

Petitioner,

v.

WILLIAM BRADDOCK,

Respondent.

_____ /

ZOOM	
DEPOSITION OF:	WILLIAM BRADDOCK
DATE TAKEN:	Friday, August 20, 2021
START TIME:	10:01 o'clock a.m.
END TIME:	11:37 o'clock a.m.
PLACE:	All parties via videoconference
REPORTED BY:	JULIE EVANS, Professional Reporter and Notary Public

1 APPEARANCES:

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

It is hereby agreed and so stipulated by and between the parties hereto, through their respective counsel, that the reading and signing of the transcript are expressly reserved.

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

2 THE COURT REPORTER: Today is August 20, 2021.
3 The time is approximately 10:01 a.m. This is the
4 deposition of William Braddock. Will counsel
5 please state whether they stipulate to the remote
6 swearing of the witness.

7 MR. HAYSLETT: We do.

8 MR. PERLMAN: Same here.

9 MS. YANES: Yes.

10 THE COURT REPORTER: Could you raise your right
11 hand. Do you solemnly swear or affirm your
12 testimony will be the truth, the whole truth,
13 nothing but the truth, so help you God?

14 THE WITNESS: Yes.

15 THE COURT REPORTER: We're on the record.

16 THEREUPON:

17 WILLIAM BRADDOCK,

18 having first been duly sworn, testified as follows:

19 DIRECT EXAMINATION

20 BY MR. PERLMAN:

21 Q. Good morning Mr. Braddock. How are you today?

22 A. I'm okay, sir. How are you?

23 Q. Okay. I would ask that you speak up just a
24 little bit or get closer to the mic; I'm not sure which.

25 A. Okay. Is this better?

1 Q. Yes. Thank you.

2 A. Okay.

3 Q. And, just to confirm, am I coming through loud
4 and clear?

5 A. Yes, sir.

6 Q. Okay. Good. Could you state your name and
7 address for the record, please.

8 A. William Braddock, 2344 First Ave. North,
9 St. Pete, Florida 33713.

10 Q. Is that a residence?

11 A. It is.

12 Q. Okay. Have you ever had your deposition taken
13 before?

14 A. I have not.

15 Q. Okay. Did you meet with anyone in advance of
16 today's deposition, other than counsel present today?

17 A. No, sir.

18 Q. Okay. So basically, there's a court reporter;
19 she's going to transcribe the questions and answers. As
20 a result, we have to take turns talking. If you don't
21 understand a question, just let me know; I'll try and
22 rephrase it. If you do, the record will reflect that
23 you understood it and answered it accordingly.

24 If you need to take a break, just let me know;
25 same with counsel. We're happy to extend that courtesy

1 at any time. Okay?

2 A. Yes, sir.

3 Q. Could you briefly describe your educational
4 background, please.

5 A. I have a four-year bachelor's degree from
6 Rollins College, in Winter Park, Florida.

7 Q. Anything after that?

8 A. No formal higher level of education, except
9 just my military occupational training school.

10 Q. And you served in the military. What branch?

11 A. The Marine Corps.

12 Q. Well, thank you for your service. Honorably
13 discharged?

14 A. Yes, sir.

15 Q. Okay. And what year was that?

16 A. 2010.

17 Q. Okay. Do you currently own any weapons?

18 A. I do not.

19 Q. Did you own any weapons, or possess any
20 weapons, at any time during 2021?

21 A. I'm trying to recall. I actually just sold the
22 last of what I had, actually; I can't remember if it was
23 the end of last year or the first month of this year.

24 Q. And so, at this point in time, you have no
25 firearms in your residence, care, or custody?

1 A. No firearms, no, sir.

2 Q. No handguns, rifles, ARs; correct?

3 A. No, sir.

4 Q. "No, sir," meaning my statement was correct?

5 A. I do not have any firearms, handguns, or rifles
6 in my possession.

7 Q. Or residence; correct?

8 A. Or residence. I do not have any of them.

9 Q. Okay. And what were the last weapons that you
10 sold?

11 A. A rifle.

12 Q. Anything else?

13 A. That was it.

14 Q. Okay. Have you been arrested in the last five
15 years, for any reason?

16 A. No, sir.

17 Q. Do you know Anna Luna?

18 A. I'd like to invoke the Fifth Amendment on that.

19 Q. Do you know an Erin Olszewski?

20 A. I'd like to also invoke the Fifth Amendment on
21 that.

22 Q. Have you ever spoken on the telephone or texted
23 Erin Olszewski?

24 A. I'd also like to invoke my Fifth Amendment on
25 that.

1 Q. If I were to ask you any question that, in any
2 way, relates Ms. Erin Olszewski, will you be asserting
3 your Fifth Amendment privileges?

4 A. Yes, sir.

5 Q. Do you know an Audra Christian?

6 A. I would also like to invoke my Fifth on that.

7 Q. Have you ever spoken with her on the telephone
8 or communicated with her via text?

9 A. Invoking my Fifth.

10 Q. And when I say "text," I also mean in
11 connection with any type of online posting or platform;
12 is that a fair understanding for you, as well?

13 A. I'm invoking the Fifth.

14 Q. If I were to ask you any question, in any way
15 related to communications with Audra Christian, would
16 you be asserting your Fifth Amendment?

17 A. I would.

18 Q. Do you know an Amanda Capes?

19 A. I'm going to invoke my Fifth on that, as well.

20 Q. Have you ever communicated with her, via
21 telephone, text, or online posting?

22 A. I'm invoking my Fifth.

23 Q. If I were to ask you any question in any way
24 related to Amanda Capes, would you assert the Fifth
25 Amendment?

1 A. Yes, sir.

2 Q. Do you know a Brad DeMint? D-E, capital
3 M-I-N-T?

4 A. I'm invoking my Fifth.

5 Q. Have you ever communicated with Mr. DeMint, via
6 telephone, texting, or online posting of any type?

7 A. I'm invoking my Fifth.

8 Q. If I ask you any question in regards to any
9 communications with Brad DeMint, would you assert your
10 Fifth?

11 A. Yes, sir.

12 Q. Do you know a James Sung, S-U-N-G?

13 A. I'm invoking the Fifth.

14 Q. Have you ever spoken to or communicated, via
15 telephone, text or online postings, in any regard, with
16 Mr. Sung?

17 A. I'm invoking my Fifth.

18 Q. If I asked you any questions in any way related
19 to any communications with James Sung, would you assert
20 your Fifth?

21 A. Yes, sir.

22 Q. Do you know Mr. Arthur D. Mackwell,
23 M-A-C-K-W-E-L-L?

24 A. Invoking my Fifth.

25 Q. Have you ever spoken to or communicated, via

1 telephone, text, or online posting, with Mr. Mackwell?

2 A. Invoking my Fifth.

3 Q. To the extent I asked you any questions
4 regarding your communications of any kind with
5 Mr. Mackwell, would you assert your Fifth?

6 A. Yes, sir.

7 Q. Are you the target of any pending
8 investigations or inquiries, at this stage?

9 A. I'm invoking my Fifth on that.

10 Q. Do you recall a conversation you had with
11 Ms. Olszewski on the evening of June 8, 2021?

12 A. I'm invoking my Fifth on that.

13 Q. Do you recall, during that conversation,
14 threatening physical harm to Ms. Luna?

15 A. Invoking the Fifth.

16 Q. Do you know where Ms. Luna resides?

17 A. Invoking the Fifth.

18 Q. Did you publish or disclose Ms. Luna's
19 residential address to anyone during 2021?

20 A. Can I have a second?

21 Q. Are you wishing to consult with your counsel?

22 A. Yes.

23 Q. Remember, just mute the phone.

24 (A discussion was held off the record.)

25 MR. HAYSLETT: We're back.

1 THE WITNESS: I would invoke the Fifth on that.

2 BY MR. PERLMAN:

3 Q. I'm just curious. I know you testified briefly
4 that you sold a rifle, you think possibly this year.
5 What type of rifle was that?

6 A. I'm going to invoke my Fifth on that.

7 MR. PERLMAN: Kevin, can you hear me?

8 MR. HAYSLETT: Yes, Alan. Yes.

9 MR. PERLMAN: Does Mr. Braddock have the
10 exhibit list in front of him?

11 MR. HAYSLETT: He does not.

12 MR. PERLMAN: Okay. Are you at your office?

13 MR. HAYSLETT: I am. I can grab it.

14 MR. PERLMAN: Well, I had emailed your partner
15 and I'd asked it to be available for both of you,
16 for ease of reference.

17 MR. HAYSLETT: That's no problem. I can get
18 it. It's here. Give me one second, I can get it.

19 MR. PERLMAN: I think that's easier.

20 MR. HAYSLETT: Alan, which is it? Is it the
21 one that starts with messages, "Luna is our
22 target," that one, No. 1 through 13?

23 MR. PERLMAN: Yes. It should be Bates-stamped,
24 at the top, 730.

25 MR. HAYSLETT: Yes, got that one. Yes.

1 MR. PERLMAN: Okay.

2 THE WITNESS: Just for my understanding, this
3 has been submitted, by you, to the court, pending
4 approval. This is not an approved thing yet; is
5 that right?

6 MR. HAYSLETT: This is just their list of
7 exhibits.

8 THE WITNESS: Has it been approved by the court
9 yet?

10 MR. HAYSLETT: It's just their list of
11 exhibits.

12 THE WITNESS: Okay. Because I was under the
13 impression that was due July 2nd, so.

14 MR. HAYSLETT: Just answer his questions.

15 THE WITNESS: Yes, sir.

16 MR. HAYSLETT: Alan, you ask the questions. Go
17 ahead.

18 BY MR. PERLMAN:

19 Q. Okay. So I'm showing you what's titled
20 Petitioner's Exhibit list, filed/stamped with the court,
21 July 30, 2021, this year. I'll direct your attention to
22 Exhibit 1, which we'll mark as Exhibit 1 for this
23 deposition.

24 It's says, on the very top, Petitioner's
25 Exhibit 1. Do you see that?

1 A. I do.

2 Q. And this purports to be a screenshot of a text
3 exchange with you, or a Facebook posting exchange with
4 you, May 14, 2021; correct?

5 A. I'm trying to find the photo. (Witness peruses
6 the document.)

7 Q. It's the very first exhibit, that's labeled
8 Exhibit 1.

9 A. I invoke my Fifth Amendment on that.

10 Q. Is Exhibit 1 an exchange with you; yes, or no?

11 A. I invoke my Fifth on that.

12 Q. If I ask you any question with regard to
13 Exhibit 1, including the recipients and the content,
14 will you assert your Fifth?

15 A. I will.

16 Q. Did you author this text on May 14, at
17 12:14 p.m., as reflected in Exhibit 1; yes, or no?

18 A. I would like to invoke my Fifth.

19 Q. Okay. Let's turn to Exhibit 2, the very next
20 page. Do you know an individual with the last name
21 Tito, T-I-T-O?

22 A. I would like to invoke the Fifth on that.

23 Q. Do you know an individual with the last name
24 Makki, M-A-K-K-I?

25 A. I would like to invoke the Fifth on that.

1 Q. If I ask you any questions regarding your
2 communications or actions with either one, Tito or
3 Makki, will you assert your Fifth?

4 A. I will.

5 Q. Did you discuss, with either or both of those
6 individuals, causing harm to Ms. Luna?

7 A. I invoke the Fifth.

8 Once again, Mr. Perlman, just for my reference,
9 this is not being audio recorded; correct?

10 Q. That's right.

11 A. Okay.

12 Q. All right. Directing your attention to Exhibit
13 2, which we're going to mark for this deposition which
14 is the very next page -- do you have it in front of you?

15 A. (No response.)

16 MR. PERLMAN: Kevin, does he have that in front
17 of him?

18 MR. HAYSLETT: He does. Are you talking about
19 2 or 3?

20 MR. PERLMAN: Exhibit 2.

21 MR. HAYSLETT: It's in front of him.

22 BY MR. PERLMAN:

23 Q. Is this a screenshot that depicts a
24 communication, via text or posting, with you?

25 A. I plead the Fifth.

1 Q. If I ask you any question with regard to this
2 Exhibit 2, will you assert the Fifth?

3 A. Yes, sir.

4 Q. Let's turn to Exhibit 3. Do you have Exhibit 3
5 in front of you?

6 A. I do.

7 Q. Okay. Did you send this communication, which
8 states, "Makki and Tito and myself are taking her out,"
9 referring to Ms. Luna?

10 A. I would like to invoke the Fifth.

11 Q. If I ask you any questions with regard to
12 Exhibit 3, will you assert the Fifth?

13 A. Yes, sir.

14 Q. Would you take a look at Exhibit 4, please.
15 Did you author this text or posting that reflects,
16 quote, "Tito and I are going to destroy her," end quote,
17 again referring to Ms. Luna?

18 A. I invoke the Fifth.

19 Q. If I ask you any question with regard to
20 Exhibit 4, are you going to assert the Fifth?

21 A. I will.

22 Q. I'm sorry?

23 A. Yes, sir.

24 Q. Let's turn to Exhibit 5, please. Do you have
25 it in front of you?

1 A. I do.

2 Q. Okay. Did you author this communication or
3 posting which publishes the residential address of
4 Ms. Luna; yes, or no?

5 A. I plead the Fifth.

6 Q. If I ask you any question in regard to Exhibit
7 No. 5, will you assert the Fifth?

8 A. I will.

9 Q. If you would turn to Exhibit 6, the very next
10 page. It's a little tough to read, because the
11 background is very dark. But it says "June 19, 2019, in
12 Orlando." Do you see it?

13 A. I plead the Fifth.

14 Q. Okay.

15 MR. PERLMAN: Kevin, does he have the exhibit?

16 MR. HAYSLETT: He does.

17 MR. PERLMAN: His is Exhibit 6; right, Kevin?

18 MR. HAYSLETT: It's Exhibit 6, with a black --
19 it's a black background, yes.

20 MR. PERLMAN: Okay.

21 BY MR. PERLMAN:

22 Q. Mr. Braddock, did you author this text that
23 states, quote, "Myself and other candidates and my team
24 will take out Luna, no questions asked"?

25 A. I plead the Fifth.

1 Q. If I ask you any question in regards to this
2 Exhibit 6, will you assert the Fifth?

3 A. Yes, sir.

4 Q. Would you turn to Exhibit 7. Do you -- have
5 you seen Exhibit 7 before?

6 A. I plead the Fifth.

7 Q. Did you author any of the content on Exhibit 7?

8 A. I plead the Fifth.

9 Q. If I ask you any question about Exhibit 7 or
10 the content of Exhibit 7, will you assert the Fifth?

11 A. Yes, sir.

12 Q. Turn to Exhibit 8, the next page.

13 MR. PERLMAN: Kevin, does he have that in front
14 of him?

15 MR. HAYSLETT: He does.

16 MR. PERLMAN: Thank you.

17 BY MR. PERLMAN:

18 Q. Have you ever seen Exhibit 8 before?

19 A. I plead the Fifth.

20 Q. Does Exhibit 8 reflect postings that you made?

21 A. I plead the Fifth.

22 Q. If I ask you any question with regard to
23 Exhibit 8, will you assert the Fifth?

24 A. Yes, sir.

25 Q. We'll go to Exhibit 10.

1 MR. HAYSLETT: We're skipping 9?

2 MR. PERLMAN: Yes.

3 MR. HAYSLETT: Okay.

4 BY MR. PERLMAN:

5 Q. Have you ever seen Exhibit 10 before?

6 A. I plead the Fifth.

7 Q. Did you author the posting directed at Mr. Sung
8 that reads, quote, "Bro, you're so goddamn lucky you
9 don't live near me, or I'd," I'm going to say f-ing,
10 "make your retarded ass disappear"?

11 A. I plead the Fifth.

12 Q. If I ask you any question with regard to
13 Exhibit 10 or the contents thereof, will you assert the
14 Fifth?

15 A. Yes, sir.

16 Q. Excuse me?

17 A. Yes, sir.

18 Q. Would you turn to the last page.

19 A. (Witness complies.)

20 Q. It's a photograph; correct?

21 A. (No response.)

22 MR. PERLMAN: Kevin?

23 MR. HAYSLETT: Yes, we have it in front of us.

24 BY MR. PERLMAN:

25 Q. Okay. Is that a picture that you see, on

1 Exhibit 10? Sir?

2 A. Yes.

3 Q. Is that a picture of you?

4 A. I plead the Fifth.

5 Q. Does that picture identify weapons that you
6 have owned in the past?

7 A. I plead the Fifth.

8 Q. If I ask you any questions with regard to this
9 picture, will you assert the Fifth?

10 A. Yes, sir.

11 Q. Going back to Exhibit 9, please. Do you see
12 it?

13 A. It says "Petitioner's Exhibit 9," yes, sir.

14 Q. All right. This an article from Politico;
15 correct?

16 A. Yes, sir.

17 Q. Have you ever reviewed it?

18 A. I plead the Fifth.

19 Q. Have you ever told anyone that you have
20 contacts with a Ukrainian or other hit squad?

21 A. I plead the Fifth.

22 Q. Did you ever tell anyone that foreign
23 individuals or states are funding or were funding your
24 campaign, at any time?

25 A. I plead the Fifth.

1 Q. Have you ever attempted to make contact with
2 Ms. Luna's spouse?

3 A. I plead the Fifth.

4 Q. Are you under the care of any physicians?

5 A. I invoke my Fifth.

6 Q. What about in May or June; were you under the
7 care of any physician?

8 A. I invoke my Fifth Amendment right.

9 Q. Did you then, or do you now, take any
10 prescribed medication?

11 A. I plead the Fifth. I'm pretty sure that's a
12 HIPAA violation, so.

13 Q. Did you then, or now, take any medication that
14 would impact your ability to recall facts and/or testify
15 truthfully today?

16 A. I invoke the Fifth. But I do want the record
17 to show that I believe that's a violation of my HIPAA
18 rights.

19 Q. It's noted. It's in the record.

20 MR. PERLMAN: All right. Let me put you on
21 hold for a minute, check my notes, confer with
22 Ms. Yanes, Katherine, as well. So stand by.

23 MR. HAYSLETT: Sure. I'm going to mute you for
24 a second, Alan, and just let me know when you're
25 ready. Okay?

1 MR. PERLMAN: Sure.

2 (A brief recess was taken.)

3 THE COURT REPORTER: We're back on the record.

4 BY MR. PERLMAN:

5 Q. Mr. Braddock, can you describe what you did
6 during your military career; did you see any combat?

7 A. Did I see any combat? No, sir.

8 Q. Did you kill anyone, while you were in the
9 military?

10 A. No, sir.

11 Q. Where were you stationed?

12 A. North and South Carolina, California, Tampa.

13 Q. And what did you do for the military, during
14 those times?

15 A. I -- my MOS was 0656, which is a computer data
16 networker.

17 Q. Have you reviewed the petition filed in both
18 these cases by the respective petitioners?

19 A. I have.

20 Q. Do you dispute the contents of those petitions?

21 A. I plead the Fifth.

22 Q. Are you planning on testifying at the hearing
23 in September?

24 A. I plead the Fifth.

25 Q. What testimony will you provide at the hearing

1 in September?

2 A. I plead the Fifth.

3 Q. Will you agree to appear at that hearing,
4 without the need of a subpoena?

5 A. I plead the Fifth.

6 MR. PERLMAN: Kevin, will you circle back on me
7 with that, please?

8 MR. HAYSLETT: Sure. And there's no need to
9 subpoena him. He'll be available at the hearing.

10 MR. PERLMAN: When you say "available" --

11 BY MR. PERLMAN:

12 Q. Sir, are you going to testify at that hearing?

13 A. I plead the Fifth.

14 Q. Sir, isn't it true that you threatened to kill
15 Ms. Luna, more than once?

16 A. I plead the Fifth.

17 Q. Isn't it true, during a telephone conversation
18 between yourself and Ms. Olszewski on June 8, 2021, that
19 you threatened to kill Ms. Luna?

20 A. I plead the Fifth.

21 Q. Isn't it true that, on other occasions, you had
22 sent texts or communications or postings in writing
23 which confirmed your intent to kill Ms. Luna?

24 A. I plead the Fifth.

25 Q. Isn't it true that you know Ms. Luna's

1 residence address?

2 A. I plead the Fifth.

3 Q. Isn't it true that you've told people
4 Ms. Luna's address?

5 A. I plead the Fifth.

6 Q. Isn't it true that you have a relationship with
7 foreign hit squads and can make people disappear?

8 A. I plead the Fifth.

9 MR. PERLMAN: I'm going to check my notes.
10 Kevin. If it's okay, instead of delaying, maybe
11 Katherine can start. And then when she's done,
12 I'll either wrap up or tell you I'm done.

13 MR. HAYSLETT: That's fine.

14 DIRECT EXAMINATION

15 BY MS. YANES:

16 Q. Good morning, Mr. Braddock. My name is
17 Katherine Yanes. Before we get started with my portion
18 of the deposition, do you need a break?

19 A. No, ma'am. I'm good.

20 Q. As I said, my name is Katherine Yanes. I'm an
21 attorney with Kynes, Markman & Fellman, in Tampa, and I
22 represent Ms. Olszewski. And I'm going to ask you a few
23 further questions, following up on Mr. Perlman's
24 questions. I'm going to start with some questions about
25 your background.

1 You mentioned that you were discharged from the
2 military in 2010; is that correct?

3 A. Yes, ma'am.

4 Q. While you were in the military, did you have
5 any weapons training?

6 A. I was a -- yes, ma'am.

7 Q. What kind of weapons training did you have, in
8 the military?

9 A. As far as the name of the courses, where they
10 were, what kind of weapons were taught?

11 Q. How about the name of the courses, and what
12 types of weapons were taught?

13 A. I went through the School of Infantry, between
14 boot camp and my MOS school, and learned how to operate
15 every weapon, besides driving a tank, that the infantry
16 uses in the Marine Corps.

17 Q. After that, while you were still in the
18 military, did you have -- and I'm going to -- I may not
19 be using the right term here; forgive me, because I
20 don't have military experience. But did you have, I
21 guess, refresher or retraining opportunities?

22 A. Yes, ma'am. Of course. We had to go to the
23 range and qualify on weapons, periodically; I believe it
24 was once a year.

25 Q. Did you have any hand-to-hand combat training,

1 while you were in the military?

2 A. Yes, ma'am.

3 Q. What kind of hand-to-hand combat training did
4 you have, while you were in the military?

5 A. In the Marine Corps, we call it MCMAP, the
6 Marine Corps Martial Arts Program.

7 Q. Again, excuse me, you'll have to excuse my
8 lack; I have no military experience. What did that
9 entail?

10 A. How to counter basic moves and how to perform
11 certain moves on an adversary.

12 Q. Does that include the types of moves that would
13 disable an opponent?

14 A. Of course.

15 Q. Does that include the types of moves that would
16 be fatal to an opponent?

17 A. Yes, ma'am.

18 Q. When you -- or after you left the military, did
19 you have any types of weapons practice or training?

20 A. None, since leaving the military.

21 Q. Since you've left the military, have you had
22 any type of martial arts or other hand-to-hand combat
23 practice or training?

24 A. No, ma'am.

25 Q. What was your -- I'll ask you next about your

1 career path since you've left the military. What was
2 your first job after you left the military?

3 A. I'm sorry; that was over ten years ago. Give
4 me a minute to...

5 MR. HAYSLETT: Do your best to answer the
6 question.

7 THE WITNESS: I'm sorry; I am trying to
8 remember.

9 BY MR. PERLMAN:

10 Q. I understand. Take your time.

11 A. So when I first got out of the military, I
12 finished college.

13 Q. Okay. Where did you go to college?

14 A. Rollins College, in Winter Park, Florida.

15 Q. Oh, that's right; you mentioned that. When did
16 you graduate from Rollins?

17 A. 2014.

18 Q. And remind me what your degree was in.

19 A. So I had a major in civic and urban planning
20 and a minor in international affairs.

21 Q. Did you do any study abroad, while you were at
22 Rollins?

23 A. No, ma'am.

24 Q. Did you do any international travel while you
25 were in the military?

1 A. No, ma'am.

2 Q. Have you ever done any international travel?

3 A. Yes, ma'am.

4 Q. Where have you traveled to?

5 A. Asia. Yes, just the Asian continent.

6 Q. When did you travel to Asia?

7 A. For the first time, when I was hired by an
8 employer after college; so November 2014 was my first
9 travel to Asia.

10 Q. Let's back up, then. What was your first
11 employer after college?

12 A. Pfizer.

13 Q. How long did you work for Pfizer?

14 A. One year.

15 Q. And what was your title?

16 A. IT Project Manager.

17 Q. And it was in that role that you traveled to
18 Asia?

19 A. Yes, ma'am.

20 Q. What countries did you go to?

21 A. Specifically for work, or while I was living in
22 Asia?

23 Q. Where did you live, when you lived in Asia?

24 A. I started out in Beijing, then I went to
25 Suzhou, and then to Shanghai.

1 Q. Where did you travel to, while you were living
2 in Asia?

3 A. Philippines, Thailand, Cambodia, Indonesia,
4 Macau, Hong Kong. To the best of my recollection, those
5 are -- that's it.

6 Q. Have you ever traveled to Ukraine?

7 A. No, ma'am.

8 Q. Have you ever traveled to Russia?

9 A. No, ma'am.

10 Q. What was your employment after you left Pfizer?

11 A. I did perform some entrepreneurial activities;
12 consulting, mainly.

13 Q. Were you self-employed as a consultant?

14 A. Yes, ma'am.

15 Q. What was the name of the company -- or did you
16 form your own company?

17 A. I did not formally register any company.

18 Q. What type of consulting work did you do?

19 A. Pharmaceutical, logistics, and technology
20 sourcing mainly with relation to cryptocurrency.

21 Q. With whom did you do business as a consultant?

22 A. Like, the names of the companies or people?

23 Q. Let's start with the names of the companies,
24 yes.

25 A. Okay. I have signed do-not-disclose agreements

1 and do-not-compete agreements with those companies, so
2 I'm unable to answer that, at this time.

3 Q. Were any of those -- well, what countries were
4 the entities that you did business with located in?

5 A. Mainly Vietnam.

6 Q. What other countries?

7 A. U.S.

8 Q. Were any of them in Ukraine?

9 A. No, ma'am.

10 Q. Were any of them in Russia?

11 A. No, ma'am.

12 Q. Were any of the individuals that you did
13 business with located in the Ukraine?

14 A. No, ma'am.

15 Q. Were any of the individuals that you did
16 business with located in Russia?

17 A. No, ma'am.

18 Q. How long did you do this type of consulting
19 work?

20 A. Four years.

21 Q. And am I correct that you started that in 2015,
22 so it was 2015 to 2019?

23 A. Correct.

24 Q. And you mentioned that some of your consulting
25 work involved cryptocurrencies?

1 A. Correct; the sourcing of electrical components,
2 mainly out of Shenzhen, to manufacture cryptocurrency
3 mining machines.

4 Q. Do you continue to remain in contact with
5 people who are engaged in, for lack of a better term,
6 cryptocurrency farming or cryptocurrency mining?

7 A. To my knowledge, the people that I still
8 communicate with are not actively farming
9 cryptocurrency, no, ma'am.

10 Q. Why did you end your consulting role, in 2019?

11 A. Because there were rumors going around about a
12 virus getting out in China and the anti-American made me
13 feel unsafe, so I wanted to return to my home country.

14 Q. Where were you living during the time you were
15 this consulting work?

16 A. Shanghai.

17 Q. Throughout the four years?

18 A. I spent three years in Shanghai, one year in
19 Beijing, one year in Suzhou, which is just a 25-minute
20 high speed rail ride west -- sorry -- yeah, west of
21 Shanghai. So basically four years in the Shanghai area,
22 one year in Beijing.

23 Q. Okay. Thank you. Where did you move to, after
24 you left China?

25 MR. HAYSLETT: You can answer.

1 THE WITNESS: Ohio.

2 BY MS. YANES:

3 Q. Where did you live, in Ohio?

4 A. I lived in the Columbus area.

5 Q. Any particular city?

6 A. Dublin.

7 Q. How long did you live there?

8 A. A little over a year, to the best of my
9 recollection. A little over a year.

10 Q. So about when did you -- I guess, what month
11 and year did you move to Ohio?

12 A. I -- oh, what year? Oh, God. I would have to
13 check, like, my flights and date book.

14 Q. Can you approximate for me?

15 A. August 2019, I moved to Ohio.

16 Q. And what type of work did you do, when you were
17 living in Ohio; what was your employment?

18 A. I had two, actually, three different employers
19 then. One of them, not all at the same time. But when
20 I first got back, I got hired on in the mortgage
21 industry; and then I also worked as a -- in a pharmacy
22 role, on the weekends.

23 Q. When you say you got hired in the mortgage
24 industry, who was your employer and what was your job
25 title?

1 A. JP Morgan Chase, and my exact title, if I
2 recall, was home loan advisor.

3 Q. Okay. And then, what was the pharmacy role?

4 A. Just a pharmacy technician position on weekends
5 at a retail pharmacy chain.

6 Q. And then you mentioned, I think, a third
7 employer during that time period; is that correct?

8 A. So while I was waiting on a background check to
9 be performed, I took on the roles at Chase and the
10 pharmacy; and when my background got approved and I got
11 the formal offer, I got back on with the DOD, as a
12 civilian working for the Department of the Army.

13 Q. What was your job working for the Army?

14 A. I was based out of the Columbus/USMEPCOM, and I
15 screened military applicants.

16 Q. I'm sorry; you said MEPCOM?

17 A. M-E-P-C-O-M. Basically, MEP, M-E-P, Military
18 Entrance Processing; Com, short for "command."

19 Q. So you were, I guess -- again, forgive my
20 ignorance of military acronyms and whatnot. Did that
21 mean you're basically doing, like, background checks on
22 people? What did that entail?

23 A. I gave aptitude tests, performed -- I proctored
24 ASLABS (ph), things like that.

25 Q. Did any of your role involve doing background

1 checks on people?

2 A. No, ma'am.

3 Q. Do you have -- and I guess I'm circling back to
4 the fact you have an IT background. Do you have the
5 ability to learn information about people, I'm going to
6 say, with a high degree of competency, using Internet
7 sources?

8 A. I plead the Fifth.

9 Q. Do you still work for the Department of
10 Defense?

11 A. No, ma'am.

12 Q. What was it that drew you to Ohio?

13 A. That's personal. Do I have to answer that? So
14 family.

15 Q. Because you have family in Ohio?

16 A. Yes, ma'am.

17 Q. Do you have a spouse?

18 A. Yes.

19 Q. Was your spouse -- or let me back up. Is your
20 -- well, what part of your family is in Ohio?

21 A. A brother-in-law and some friends.

22 Q. Anyone else?

23 A. Not family, no, ma'am.

24 Q. Where does your spouse live?

25 A. Right now, in the Philippines.

1 Q. And what is your spouse's name?

2 A. Maria Cecilia Dukay Sandoval.

3 Q. And when were you married?

4 A. May 20, 2018.

5 Q. How long has your wife been in the Philippines?

6 A. I'm not sure I understand the question. She's
7 a Philippine national. I'm not sure I understand the
8 question.

9 Q. Oh, okay. I guess maybe I'll phrase it in a
10 different way. Has your wife been in the Philippines,
11 throughout your marriage?

12 A. Not the entire part.

13 Q. Okay. Let me make it a little simpler. Where
14 did you meet your wife?

15 A. When we were both living and working in
16 Shanghai.

17 Q. And when did she move to the Philippines?

18 A. I don't remember an exact time frame but,
19 roughly, one year after we were married. Roughly.

20 Q. So where does that correspond with, in terms of
21 when you moved to Ohio?

22 A. I moved back to Ohio before she moved back to
23 the Philippines.

24 Q. Is there a reason that she didn't move with you
25 or you didn't move with her?

1 A. I wanted to come back to my home country, for
2 safety reasons; and she had to continue her contract
3 that she had signed, and they relocated her back to the
4 Philippines for safety reasons, as well.

5 Q. Do you have any children?

6 A. I have one stepdaughter.

7 Q. With your wife who is in the Philippines?

8 A. Correct.

9 Q. Has there ever been any allegations of violence
10 between you and your spouse?

11 A. Absolutely not.

12 Q. After you left Ohio, where did you go?

13 A. St. Petersburg.

14 Q. So when exactly did you move to St. Petersburg?

15 A. October 24, I guess it would have 2020. Yeah.
16 2020.

17 Q. 2020. And what is your employment here?

18 A. Currently?

19 Q. Yes. Or let's start from when you left your --
20 or did you leave your employment with the Department of
21 Defense?

22 A. I did.

23 Q. When did you leave your employment with the
24 Department of Defense?

25 A. September 2020.

1 Q. And why did you leave that employment?

2 A. Originally, it was just a leave of absence, to
3 get my hips replaced; then I decided to relocate to
4 St. Petersburg, so I informed my superior that I would
5 not be returning.

6 Q. And what has been your employment since you
7 moved to St. Petersburg?

8 A. I have not sought formal employment. I am a
9 service-connected disabled veteran and get some
10 compensation every month from the VA, and that's it.

11 Q. Outside of formal employment, have you engaged
12 in any type of informal employment?

13 A. I have not.

14 Q. How did you come to run for office?

15 A. How did I make the decision to do that?

16 Q. Yes.

17 A. I felt that, with my life experiences and
18 qualifications and my last Marine Corps unit being right
19 in Tampa and having a lot of friends still in the area
20 and knowing some people here, I felt that if I put
21 together the right campaign committee/campaign team, if
22 you will, that I had a good shot at it; I had a good
23 chance of it.

24 Q. Did anyone, in particular, encourage you to run
25 for office?

1 A. No.

2 Q. Have you continued your involvement with
3 cryptocurrency, with the cryptocurrency field, since
4 you've been living in Florida?

5 A. I have no involvement in cryptocurrency
6 currently.

7 Q. And is that true for the last, let's say, three
8 years?

9 A. I mean, I've bought and sold some small
10 amounts, but nothing -- nothing substantial.

11 Q. Has anyone ever accused you of threatening
12 violence?

13 MR. HAYSLETT: Are you referring to other than
14 the allegations in this matter?

15 MS. YANES: Yes. Thank you for clarifying
16 that.

17 BY MS. YANES:

18 Q. Yes. Other than the allegations at issue in
19 these proceedings, has anyone ever alleged that you
20 threatened them with violence?

21 A. Can you give me a minute?

22 Q. Yes.

23 (A discussion was held off the record.)

24 MR. HAYSLETT: And, I'm sorry, Katherine, the
25 question was? We just wanted some clarification.

1 I presume you mean other than the witnesses and the
2 petitioners in this incident; is that what you're
3 asking?

4 MS. YANES: That is correct.

5 MR. HAYSLETT: Thank you.

6 BY MS. YANES:

7 Q. Other, than the allegations involved in this
8 proceeding have you ever -- has anyone ever made
9 allegations --

10 A. No, ma'am, not to my knowledge.

11 Q. -- that you threatened them with violence?

12 A. Not to my knowledge.

13 Q. Outside the context of military training, have
14 you ever engaged in an act of violence?

15 A. No, ma'am.

16 Q. You've never gotten into a physical fight?

17 MR. HAYSLETT: Are you referring to, like,
18 sparring in the military?

19 MS. YANES: I said, outside the context of
20 military training.

21 MR. HAYSLETT: Training, got you. Sorry.

22 THE WITNESS: I cannot recall a time I've been
23 in a physical altercation, no.

24 BY MS. YANES:

25 Q. Has anyone ever sought an injunction of

1 protection against you, outside of the proceedings that
2 we're here on today?

3 A. Yes. And that injunction was not granted.

4 Q. What were the circumstances?

5 A. It was a boyfriend/girlfriend situation, where
6 we were living together and she wanted me to propose to
7 her and I wanted to break up and move. So in a last
8 ditch attempt, she tried to file an injunction against
9 me, to try to get back at me. And the judge saw it for
10 what it was and dismissed it.

11 Q. And when was this?

12 A. Oh... I'm sorry; I'm taking my time because
13 I'm trying to recall; it was a while ago. There's court
14 documents, out of Orange County, Florida, that would
15 reflect the exact dates. But if I had to make a guess,
16 I would say 2013-ish.

17 Q. And what was the name of the petitioner?

18 A. Danielle Bartz.

19 Q. Danielle?

20 A. Danielle Bartz, B-A-R-T-Z.

21 Q. And what did Ms. Bartz allege that you did?

22 A. I can't remember, off the top of my head. All
23 the details are listed in the documents of the court.
24 But they were unfounded, and the judge dismissed that
25 case.

1 Q. All right. I'm now going to turn to the
2 allegations that are involved in this case. And I
3 understand you need to do what you need to do. I'm sure
4 that you understand I need to ask these questions.

5 I'm going to first ask about a telephone call
6 that took place late on the night of June 8, or early on
7 the morning of June 9, of this year. Isn't it true
8 that, in the course of that telephone call, you
9 threatened the life of Ms. Luna?

10 A. I invoke the Fifth.

11 Q. Isn't it true that, during that telephone call,
12 you indicated to Ms. Olszewski that you had connections
13 to a Russian and Ukrainian hit squad?

14 A. I invoke the Fifth.

15 Q. Isn't it true that during that call you stated
16 that -- to Ms. Olszewski, that she could be collateral
17 damage, if she --

18 A. I'm going --

19 Q. I'm sorry; I'm going to ask you to just let me
20 finish the question before you respond. I understand;
21 it's natural to want to --

22 A. I'm sorry; I wasn't aware you weren't finished.
23 I'm sorry.

24 Q. I'm just restart that question. Isn't it true
25 that you stated to Ms. Olszewski during that

1 conversation that she could be collateral damage, if she
2 were anywhere near Ms. Luna?

3 A. I invoke the Fifth.

4 Q. Isn't it true that you've stated to
5 Ms. Olszewski that it would be a shame if something
6 happens to her and you know that she has children?

7 A. I invoke the Fifth.

8 Q. Isn't it true -- and now I'm going to go away
9 from that particular phone call. Isn't it true that, on
10 multiple occasions, you've sent Ms. Olszewski voice
11 texts in which you threatened Ms. Luna and
12 Ms. Olszewski?

13 A. I invoke the Fifth.

14 Q. I'm going to back up now and ask you about how
15 it was that you came to be introduced to Ms. Olszewski.
16 Why did you initially ask to be introduced to
17 Ms. Olszewski?

18 A. I invoke the Fifth.

19 Q. Isn't it true that you sought out Ms. Olszewski
20 and she did not seek you out?

21 A. I invoke the Fifth.

22 Q. Isn't it true that you asked to be introduced,
23 by a third party, to Ms. Olszewski?

24 A. I invoke the Fifth.

25 Q. Isn't it true that you repeatedly sought out

1 Ms. Olszewski?

2 A. I invoke the Fifth.

3 Q. Isn't it true that you repeatedly contacted
4 Ms. Olszewski without her initiating the contact?

5 A. I invoke the Fifth.

6 Q. Since the date that the petition was filed in
7 this case, have you spoken to any members of the media
8 regarding this matter?

9 A. I invoke the Fifth.

10 Q. Regarding whether you've spoken to the media?

11 MR. HAYSLETT: You can answer that, if you
12 have, not what you've said.

13 THE WITNESS: Whether I've spoken to the media
14 about this case?

15 MR. HAYSLETT: No, no. Her question was, have
16 you spoken to the media, period; not what you said.

17 THE WITNESS: Can you repeat the question,
18 please.

19 BY MS. YANES:

20 Q. Since the petition was filed in this case, have
21 you spoken to the media?

22 MR. HAYSLETT: You can answer that.

23 THE WITNESS: Can you just give me one second?

24 Thank you.

25 (A discussion was held off the record.)

1 MR. HAYSLETT: Sorry, Katherine. Go ahead.

2 MS. YANES: Gosh I think I lost track between
3 what I was asking and where we were.

4 MR. HAYSLETT: The question was, have you ever
5 spoken to the media since this petition was filed.

6 MS. YANES: That's right. I couldn't remember
7 if we were on that, or which members of the media.

8 BY MS. YANES:

9 Q. So let's start with, since the petition has
10 been filed, have you spoken to any members of the media?

11 A. Yes.

12 Q. Since the petition has been filed, what members
13 of the media have you spoken to?

14 A. You're going to have to -- to the best of my
15 recollection, because I was getting phone calls and
16 emails almost every other hour, the ones that I
17 responded to that I can remember are Politico, Tampa Bay
18 Times, WFLA, Channel 8; I was on a radio show, I don't
19 know if you consider that "the media."

20 Q. I do.

21 A. Okay. The Ron Ogden Show, "The Republic of
22 Pinellas," Wednesdays at 4 p.m., I was on that.

23 Q. Do you know what date?

24 A. Oh, gosh. I do not. I could get that
25 information to you later. It's -- actually, it's

1 recorded; it's on YouTube. The video and audio is on
2 YouTube, so.

3 Q. Thank you. Anyone else?

4 A. That's -- Politico. There was some web-based
5 company that mistakenly put, in the details of this
6 article, that I was an attorney. And I just contacted
7 them, to tell them that I was not and they needed to
8 correct that. I can't remember the name of them, but it
9 wasn't a major one.

10 Q. Have you spoken to anyone else -- excuse me.
11 Actually, let me make that more precise. Have you
12 spoken to any other members of the media that you can
13 recall, other than the list you gave me just now?

14 A. No, ma'am.

15 Q. Have you spoken to any members of the national
16 media?

17 A. I have, actually. Now that you've jogged my
18 memory about the previous question, I did give an
19 interview to CNN.

20 Q. Who did you speak to at CNN?

21 A. Oh, I forget their names. But I'm sure I could
22 find that information and get it back to you. Two
23 female reporters, one based -- I think they were both
24 based out of Miami.

25 Q. And you don't remember their names?

1 A. Honestly, I do not. But I could look that
2 information up and give it to you at a later date.

3 Q. I would appreciate that, if you wouldn't mind
4 following up with that. Do you know what show they were
5 affiliated with on CNN?

6 A. So the original person that made contact with
7 me was the boss or senior producer, I think is what her
8 title was. Her employee was associated with the
9 Anderson Cooper 360 show.

10 Q. And you did do an interview with these -- I
11 think you said two female reporters?

12 A. Well, so the first lady that contacted me was
13 kind of like a senior level position and just trying to
14 see if I would even be willing to do an interview; then
15 she sent a correspondent out to interview me in person.

16 Q. Was that interview recorded?

17 A. There were cameras, so I think so.

18 Q. Has that interview ever aired?

19 A. I don't know. I do not watch that network.

20 Q. Did you --

21 A. No one told me if it's aired or not.

22 Q. I'm sorry; I missed what you said.

23 A. They didn't inform me if it has aired or not.

24 Q. But to the best of your knowledge, it has not;
25 is that correct?

1 A. I would assume it has. If they took the time
2 and effort to send someone up here with a camera crew
3 from Miami, I would assume it did air. But I can't
4 confirm that, because I don't watch that network.

5 Q. What did you say to CNN?

6 A. I invoke the Fifth.

7 Q. Did you state to CNN that Ms. Olszewski is a
8 political operative for Ms. Luna?

9 A. I invoke the Fifth.

10 Q. Isn't it true that you are aware that
11 Ms. Olszewski is not a political operative for Ms. Luna?

12 A. I invoke the Fifth.

13 Q. Isn't it true that Ms. Olszewski has no
14 affiliation, other than friendship, with Ms. Luna?

15 A. I invoke the Fifth.

16 Q. Isn't it true that you stated, in comments to
17 media, that Ms. Olszewski may have manipulated audio?

18 A. I invoke the Fifth.

19 Q. Isn't it true that you stated to the media that
20 you did not say the things that Ms. Olszewski alleged
21 that you said?

22 A. I invoke the Fifth.

23 Q. Isn't it true that, indeed, you did state to
24 Ms. Olszewski the statements she has said in her
25 petition that you said to her?

1 A. I invoke the Fifth.

2 Q. Did you provide any of the reporters that you
3 spoke to with Ms. Olszewski's contact information?

4 MR. HAYSLETT: Could you repeat that question.

5 BY MS. YANES:

6 Q. Did you provide any members of the media that
7 you spoke to with Ms. Olszewski's contact information?

8 A. I invoke the Fifth.

9 MR. PERLMAN: If you don't mind, I'm just going
10 to go off camera for just a couple minutes.

11 MR. HAYSLETT: We'll take a break for a minute.

12 MS. YANES: We'll have a restroom break, and
13 let's reconvene in about five minutes.

14 (A brief recess was taken.)

15 THE COURT REPORTER: We're back on the record.

16 BY MS. YANES:

17 Q. Thank you, Mr. Braddock, for your patience. I
18 just have a few more questions. Have you ever filed a
19 petition for a restraining order against anyone else?

20 A. I can't remember ever needing to.

21 Q. Is that a "no"?

22 A. From what I can remember, I never have, no.

23 Q. Thank you. How did you know that Ms. Olszewski
24 has children?

25 A. I plead the Fifth.

1 Q. Who have you shared information about
2 Ms. Olszewski's children with?

3 A. I plead the Fifth.

4 Q. Isn't it true that you have shared information
5 about Ms. Olszewski's children with others?

6 A. I plead the Fifth.

7 Q. I have previously asked you about whether you
8 had shared information about Ms. Olszewski with any
9 members of the media. I'm going to now ask you whether
10 you shared Ms. Olszewski's information with anyone other
11 than the media?

12 A. I plead the Fifth.

13 Q. Isn't it true that you did share
14 Ms. Olszewski's information --

15 A. I plead the Fifth.

16 Q. Please let me finish the question. Isn't it
17 true that you shared information about Ms. Olszewski
18 with people other than members of the media?

19 A. I plead the Fifth.

20 Q. Isn't it true that you shared contact
21 information, including Ms. Olszewski's address, with
22 individuals other than the media?

23 A. I plead the Fifth.

24 Q. Isn't it true that you shared personal
25 information about Ms. Olszewski with individuals other

1 than the media?

2 A. I plead the Fifth.

3 Q. Isn't it true that you shared information about
4 Ms. Olszewski's children with individuals other than the
5 media?

6 A. I plead the Fifth.

7 MS. YANES: All right. That's it for me.
8 Thank you. I appreciate, again, your patience.
9 And I think Mr. Perlman may have a couple of
10 wrap-up questions, but I will let him speak to
11 that?

12 MR. PERLMAN: Thank you.

13 MR. PERLMAN: Mr. Braddock, not too much
14 longer. So I appreciate your patience, same for
15 you, of course, Kevin.

16 MR. HAYSLETT: Certainly.

17 REDIRECT EXAMINATION

18 BY MR. PERLMAN:

19 Q. Mr. Braddock, was there a time you announced
20 your candidacy for the 13th Congressional District?

21 A. Yes, sir. Well, not a formal announcement; but
22 I did file with the REC, yes, sir.

23 Q. And when was that, do you recall?

24 A. It became official the same day the first Tampa
25 Bay Times story came out about this; I can't remember

1 exactly what day. But I know it was -- it was the first
2 Monday of the month because there was a Republican
3 Executive Committee that evening.

4 Q. And you don't recall what month?

5 A. I don't want to say the wrong month. I've got
6 a lot of things on my mind right now. So I can look
7 that information up and get back to you, if you'd like.

8 Q. Yes. And what year are we talking about, just
9 so the record is clear?

10 A. This year.

11 Q. 2021?

12 A. Yes, sir.

13 Q. Okay. And did you announce your intent to run
14 prior to that?

15 A. I spoke to several people and asked potential
16 members of my would-be committee, if they would be
17 willing to work with me.

18 Q. And did you raise any money for this campaign?

19 A. Did I raise any money?

20 Q. Yes.

21 A. No, sir, I did not.

22 Q. Was there anyone that raised money on your
23 behalf for this campaign?

24 A. No, sir.

25 Q. Have you ever or do you know have a concealed

1 weapons permit for any state?

2 MR. HAYSLETT: You can answer.

3 THE WITNESS: I have one in the state of Ohio;
4 I had one in the state of Florida, until this
5 injunction. And I mailed it back to Tallahassee.

6 MR. PERLMAN: Okay. I think that's all I have
7 at this time. Thank you very much.

8 MR. HAYSLETT: Katherine, anything else? Any
9 follow-up?

10 MS. YANES: Sorry, it took me a second. No, I
11 don't have any follow-up. Thank you both very much
12 for your patience this morning.

13 MR. HAYSLETT: That's all the questions?
14 Awesome. Ms. Court Reporter, I know you need the
15 correct spelling --

16 MR. PERLMAN: Wait. Do you want to instruct
17 the witness whether he's going to read or waive?

18 MR. HAYSLETT: He's going to read.

19 MR. PERLMAN: We'd like a copy, please.

20 (Thereupon, the testimony was concluded at
21 11:37.)

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CERTIFICATE OF OATH

STATE OF FLORIDA)
COUNTY OF ORANGE)

I, Julie S. Evans, Professional Court Reporter,
Notary Public, State of Florida, certify that WILLIAM
BRADDOCK appeared before me via Zoom on August 20, 2021,
and was duly sworn.

Witness my hand and official seal this 1st day
of September 2021.



JULIE S. EVANS
Professional Court Reporter
Notary Public, State of Florida
My Commission No. GG939756
Expires: 1/21/2024

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF ORANGE)

I, Julie S. Evans, Professional Court Reporter,
do hereby certify that I was authorized to and did
stenographically report the deposition of WILLIAM
BRADDOCK; that a review of the transcript was requested;
and that the foregoing transcript, page number 1 through
51, is a true and complete record of my stenographic
notes.

I further certify that I am not a relative,
employee, attorney, or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorneys or counsel connected with the action, nor am I
financially interested in the action.

Dated this 1st day of September 2021.



Julie S. Evans
Professional Court Reporter

ERRATA SHEET

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I, WILLIAM BRADDOCK, wish to make the following alterations:

Page	Line	Correction

Under penalties of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

_____ WILLIAM BRADDOCK

Date

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6:56

LTE

PETITIONER'S EXHIBIT 1
HEARING DATE OF
SEPTEMBER 14, 2021

Cancel

New Message



To: William Braddock,



MAY 14, 12:14 PM

I've got television, radio, podcast, and other interviews like up first week of June. Any possibility for me to give a 5-10 min speech at Mugs sometime in June?

Also keep this between us but Tito might jump in for FL-13 as well and between us two Marines, we will make Luna look like the joke she really is

We have an alliance and Lune is our target

Luna*

It scares the absolute fuck outta me that she could be in a position to write laws it really does scare me because she's a moron



MAY 14, 2:59 PM

So, you're not going to run now? Tito will? I like Tito.

MAY 14, 2:59 PM



Aa



EXHIBIT

Petitioner's 1
8/20/2021

10:18

PETITIONER'S EXHIBIT 2
HEARING DATE OF
SEPTEMBER 14, 2021



William Braddock

Active 5m ago



9:37 AM

Hey, I may or may not be taking a private jet to hand delay papers to Tally tomorrow. Would you be interested in joining me?



When?

Not sure of times. Working on logistics now



How many people going?

Me, my driver, the pilot

Maybe my PR guy

I'm not fucking around, I formed an alliance with Makki as well. We cannot let Luna the lunatic win



EXHIBIT

Petitioner's No. 2
8/20/2021

PETITIONER'S EXHIBIT 3
HEARING DATE OF
SEPTEMBER 14, 2021

1:28

LTE



William Braddock

Active now



Don't worry about it

12:08 AM

How was the round table? We didn't get finished at the school board u til 8pm. Apparently, Tito and Luna showed up at the same time. I was inside so I missed it.

Matt did a great job speaking a few weeks ago. But I don't think he spoke this time

1:11 AM

Luna is a grease spot

Makki and Tito and myself are taking her out

Please don't be associated with her

Call me if you can I'll discuss more on phone not on text



EXHIBIT

Petitioner's No. 3
8/20/2021

