

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, PINELLAS COUNTY

ANNA PAULINA LUNA

ERIN M. OLSZEWSKI,

Case Nos. 21-004904-FD

Petitioners,

21-004911-FD

vs.

WILLIAM BRADDOCK,

Respondent.

\_\_\_\_\_/

PROCEEDINGS: Injunction Hearing  
Volume I

DATE: September 14, 2021

BEFORE: The Honorable Doneene Dresback Loar  
Circuit Court Judge

PLACE: Pinellas County Justice Center  
14250 49th Street North  
Clearwater, Florida 33762  
(727) 464-8700

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P R O C E E D I N G S

1  
2 THE COURT: All right. Mr. -- oh, let me see --  
3 yeah. Mr. Mackwell, can you hear me?

4 MR. MACKWELL: I can.

5 THE COURT: Okay. Who -- which case are you a  
6 witness for?

7 MR. MACKWELL: The Anna Paulina -- the stalking.

8 THE COURT: Okay. Who is going to potentially  
9 be calling you as a witness?

10 MR. MACKWELL: I guess Alan Perlman.

11 THE COURT: Okay. So the petitioner. All  
12 right. Sir, I'm going to just put you in the waiting  
13 room as of right now, okay?

14 MR. MACKWELL: Sure.

15 THE COURT: All right. I'm glad that the audio  
16 issues got worked out.

17 MR. MACKWELL: Yeah. I -- I finally figured it  
18 out.

19 THE COURT: Thank you.

20 MR. MACKWELL: Okay.

21 THE COURT: All right. All right. I'm going to  
22 start by admitting the parties. I'm not sure.

23 UNIDENTIFIED SPEAKER: Sixteen mocks on well  
24 over on 301.

25 THE COURT: Oh.

1 UNIDENTIFIED SPEAKER: Which could relieve some  
2 traffic from 41 and 301.

3 THE COURT: All right.

4 UNIDENTIFIED SPEAKER: Our other suggestion is  
5 widening 69th Street East.

6 THE COURT: All right. I'm not sure whose audio  
7 I'm hearing. Okay. All right. I am going to -- I  
8 think Judge Nage (phonetic) has got us hopefully  
9 muted in the other courtroom.

10 I have some parties in here who have not renamed  
11 themselves, so I'm going to have to try to identify  
12 who they are before starting the hearing. Let me  
13 see. All right. And -- all right. That Pierce  
14 would be somebody who might already be in here.  
15 Okay. Scroll.

16 UNIDENTIFIED SPEAKER: Curt Anderson is a  
17 reporter, as is Scott Bannechik (sic).

18 THE COURT: Okay. I'm just going to be  
19 admitting these parties, and then see what we have.  
20 All right. Okay. I'm going to go through the  
21 people.

22 UNIDENTIFIED SPEAKER: Judge, good morning.

23 THE COURT: Good morning. Mr. Bannechik, can  
24 you please mute yourself?

25 All right. So let me ask. I have Ms. Yanes

1 (phonetic) here. I have an Amanda. Amanda, who --  
2 what case are you here on?

3 UNIDENTIFIED SPEAKER: Oh, sorry, sorry, sorry,  
4 Your Honor.

5 THE COURT: Amanda?

6 MS. CAPES: Hello?

7 THE COURT: Yes, what --

8 MS. CAPES: Yes?

9 THE COURT: What case are you here on?

10 MS. CAPES: I'm here at the request of Mr.  
11 Perlman.

12 THE COURT: Okay. Are you going to be a  
13 potential witness in the case?

14 MS. CAPES: Yes.

15 THE COURT: Okay. And can I get your last name,  
16 Amanda?

17 MS. CAPES: Yes. It's Capes. C-A-P-E-S.

18 THE COURT: Okay. All right. I'm going to put  
19 you back in the waiting room as of right now.

20 MS. CAPES: Okay.

21 THE COURT: Okay. All right. I have a Bonita  
22 Hall (phonetic). What case are you --

23 MS. HALL: Judge?

24 THE COURT: What case are you here on?

25 MS. HALL: Judge, I'm here today on a case -- I

1 petitioned the Court for an injunction.

2 THE COURT: Okay. All right. This -- the case  
3 that I'm addressing right now is not your case. I'm  
4 going to just put you in the waiting room, okay?

5 MS. HALL: Yes, ma'am.

6 THE COURT: Thank you. All right. I have an  
7 Alfonso Hardin (phonetic). Sir, what case are you  
8 here on?

9 MR. HARDIN: Yes, ma'am. How you doing?

10 THE COURT: I'm good.

11 MR. HARDIN: That's good. Which case? Do you  
12 need the case number?

13 THE COURT: All right. Are you a petitioner or  
14 a respondent?

15 MR. HARDIN: Respondent.

16 THE COURT: Okay. I'm going to put you in the  
17 waiting room. The -- this case that I am about to  
18 call is not your case yet, okay?

19 MR. HARDIN: Okay.

20 THE COURT: All right. Just stand by. All  
21 right. All right. Let's see. Mr. Sung?

22 MR. SUNG: Yes?

23 MR. PERLMAN: I can -- wait, Judge. This is  
24 Alan Perlman. He's also a witness in the Luna and  
25 Olszewski petitions.

1 THE COURT: Okay. All right. Mr. Sung, I'm  
2 going to put you in the waiting room.

3 MR. SUNG: Okay.

4 THE COURT: While you do that -- all right. Let  
5 me see. All right. Is there any other -- a Grace  
6 Albergo (phonetic)? Is she a witness or media?

7 MR. PERLMAN: I'm not familiar with those names.

8 THE COURT: Okay.

9 MR. BANNECHIK: This is Scott. It's  
10 (unintelligible), we're a new service by St. Pete.

11 MS. ALBERGO: And Judge, I'm just here to  
12 listen.

13 THE COURT: Okay. All right. So you are just a  
14 person listening to this hearing or other hearings?  
15 Because I'm going to put everybody in a breakout room  
16 that's trying to listen to this hearing with Ms. Luna  
17 and Ms. Olszewski.

18 MS. ALBERGO: Yes, to this hearing.

19 THE COURT: Okay.

20 MS. ALBERGO: Thank you.

21 THE COURT: All right. So I'm going to assign  
22 everybody to a breakout room. Breakout room 2, so  
23 you're going to have to join those that I am aware  
24 that's involved in this -- or listening.

25 MR. BRANSICK: Hi, Judge. This is Scott



1 Bransick (phonetic). I didn't hear you. You're  
2 going to put me in a room?

3 THE COURT: Yes, sir. You're -- you're  
4 listening, right, to this?

5 MR. BRANSICK: Yes, ma'am.

6 THE COURT: All right. I think that was the  
7 echo. There's a Will B.

8 THE CLERK: Judge, that's the respondent, Mr.  
9 Braddock.

10 THE COURT: Oh, okay. Okay. All right. I'm  
11 just going to rename him. All right. I'll put him  
12 in the waiting room -- or in the second room.  
13 Certido (phonetic) is an observer. All right. If  
14 everybody would just join the -- the -- the Zoom Room  
15 2 when it opens up.

16 That's interesting. Oh no. I didn't mean to do  
17 that. Oh, then we're having a -- another difficulty.  
18 Technology is never perfect.

19 Got -- somehow they got closed, so I got to  
20 reopen them? All right. All right.

21 Mr. Hayslett, is this your book?

22 MR. HAYSLETT: Yeah, it's just -- it's just --  
23 it's just your -- our motion to the case law.

24 THE COURT: Okay.

25 THE CLERK: And Your Honor, I believe Audra

1 Christian is also a witness.

2 THE COURT: Okay. All right.

3 MR. PERLMAN: Yeah, Judge, there could be --  
4 there should be a few more. When you're ready, I'll  
5 get those names for you.

6 THE COURT: Okay. Is Audra Christian a witness?

7 MR. PERLMAN: Yes.

8 THE COURT: Okay. I'm going to have to move  
9 her. Okay. Not sure I got a copy of the witness  
10 list, other than the one that only had four people on  
11 it. Was there an amended witness list filed?

12 MR. PERLMAN: Yeah. Yes, Judge, there was one  
13 filed on July 30, consistent with your prior order.

14 THE COURT: Okay. All right. I'm going to join  
15 the breakout room so everybody could join that room.  
16 All right. All right. So I have Mr. Christian, Mr.  
17 Mackwell, Mr. Sung. I'm going to assume to WT -- or  
18 WSTS is a media. Uh-huh. All right. Waiting room.

19 All right. I think that gets us --

20 MR. PERLMAN: And may I check a couple more  
21 names, Judge, 'cause --

22 THE COURT: Sure.

23 MR. PERLMAN: -- I'm not sure if I heard them.  
24 I want to make sure you got them.

25 THE COURT: Okay.

1 MR. PERLMAN: There is a Brad DeMint (phonetic).

2 THE COURT: I did see a Brad DeMint at one  
3 point. Let me see. I do not see them in the waiting  
4 room right now, so let me --

5 MR. PERLMAN: And then Arthur Mackwell  
6 (phonetic).

7 THE COURT: Mr. Mackwell is in the waiting room.

8 MR. PERLMAN: Okay.

9 THE COURT: Okay. I'm going to ask my assistant  
10 to exit the -- the breakout room and see, because I  
11 just entered a media outlet, and I didn't realize  
12 that once I enter them into the meeting, I -- I can't  
13 move them to my breakout room.

14 MR. PERLMAN: Understandable.

15 THE COURT: Let me see, okay. Hold on a second,  
16 maybe I can. I do see Mr. Mint (sic). And -- okay.  
17 I'm going to -- I do see Mr. DeMint. I'm going to --  
18 hopefully, he's going back to the waiting room.  
19 Okay. I can, actually. I figured out where I can  
20 find it. Okay. Let me just make sure that Mr.  
21 DeMint isn't on here. So I have an Erin Marie Murray  
22 (phonetic), not sure who that is. Is that anybody  
23 related to any of these parties?

24 MR. PERLMAN: The petitioner.

25 UNIDENTIFIED SPEAKER: Yes, Your Honor. That's

1 Ms. Olszewski, the --

2 THE COURT: Okay.

3 UNIDENTIFIED SPEAKER: Yeah.

4 THE COURT: All right. Well, she's not in this  
5 room, so we need to get her to join.

6 UNIDENTIFIED SPEAKER: Um.

7 THE COURT: And Mr. Braddock is not in this room  
8 as well. So.

9 MR. PERLMAN: And I -- I can't tell. Is Ms.  
10 Luna in this yet?

11 THE PETITIONER: Yes, I am. I'm here.

12 MR. PERLMAN: Okay. Excellent.

13 THE COURT: All right. I'm looking at -- okay.  
14 All right. And we'll rename Erin Marie Marie, Mr.  
15 Baronick (sic), and Mr. -- Mr. Hayslett, your client  
16 has not joined the room.

17 MR. HAYSLETT: He's not in the room, Judge?

18 THE COURT: No.

19 MR. HAYSLETT: I saw him there a -- he should be  
20 William B.

21 THE COURT: I -- no, I did rename him. He just  
22 needs to -- it'll say join room. He just actually  
23 has to click the button to join the room.

24 MR. HAYSLETT: Got you. I'm going to text him  
25 to please.



1 THE COURT: I promise I invited him.

2 MR. HAYSLETT: Okay.

3 THE COURT: All right. All right. I think we  
4 have -- Mr. Perlman, Mr. Olszewski, Ms. -- Ms. Luna.  
5 I just need to get the respondent, and we'll get  
6 started. The other -- Mr. Baronick (sic) -- did not  
7 join, but that's something he's going to have to  
8 figure out. All right.

9 All right. Let me ask --

10 MR. HAYSLETT: Did the breakout room have a  
11 name, Judge?

12 THE COURT: Room 2.

13 MR. HAYSLETT: Room 2.

14 THE COURT: All right. I do have some  
15 identified people in. Let me see. I'm sure of this  
16 person because they have properly named themselves.  
17 Then it says Associated Press, so I assume they're  
18 here for this. I'm going to have two phone numbers.  
19 I'm going to have an assistant help me with renaming  
20 them and finding out if they're a part of this  
21 hearing or just --

22 UNIDENTIFIED SPEAKER: I just joined.

23 THE COURT: All right. I'm going to mute you,  
24 sir.

25 All right. All right. Let me try moving Mr.

1 Braddock to a different room, see if he can figure  
2 out how to -- and then we can have --

3 MR. HAYSLETT: Yeah. He said he's trying to get  
4 in.

5 THE COURT: I'm moving him back. Usually, it  
6 says would you like to join Room 2 --

7 MR. HAYSLETT: That's what I told him.

8 THE COURT: -- and you just have to hit yes. So  
9 I moved him to 4 and then I moved him back to 2 to  
10 maybe hope that that -- okay. He's in 4, so let me  
11 move him to 2.

12 MR. HAYSLETT: Perfect.

13 THE COURT: Sometimes the message goes fast and  
14 depends on what you have on your computer. Well, he  
15 got into 4, but I'm trying to move him back to 2 --  
16 or move him to 2. Tell him he'll have to do it  
17 again.

18 MR. HAYSLETT: I'm telling him right now, Judge.

19 THE COURT: We have some progress. We're so  
20 close. Does he want me to try moving him back to 4  
21 and then moving him back to 2 again?

22 MR. HAYSLETT: That'd be great.

23 THE COURT: All right. I'm willing to. All  
24 right.

25 MR. HAYSLETT: Just -- he just said he's on 2

1 now. I don't know if I see him up there. I can't  
2 see that far.

3 THE COURT: Oh. Hold on. Maybe he was doing in  
4 that -- oh, no. Okay. So now he's in 4. He's  
5 steadily in 4, so I'm going to -- oh, wait. Now he's  
6 coming back to 2. He just needs to join 2. If not,  
7 I'm going to have to move everybody to 4, because --

8 MR. HAYSLETT: I remember this class at law  
9 school. It was really good.

10 THE COURT: Yes. We've all learned a lot in the  
11 last year. Where is that? I do not know. All  
12 right. Mr. DeMint, I am going to move you back to  
13 the waiting room, because I have been informed that  
14 you're a witness, so I'm going to put you in the main  
15 session.

16 MR. DEMINT: All right.

17 THE COURT: All right. I'm going to put him  
18 back in the main session, and then I think I have  
19 to -- from there, I can put him back in the waiting  
20 room. Maybe not. All right. All right. Let me  
21 just try that. I'm going to move him to 4, and I  
22 think everybody's just going to move to 4 at this  
23 point.

24 All right. I'm going to move everybody to Room  
25 4 because that seems to be the one that Mr. -- I'm

1 going to wait till he's connected -- Mr. Braddock  
2 connects to. Maybe. All right. I am going to move  
3 everybody to Room 4. So it's going to show everybody  
4 to join Room 4. It does seem like Mr. Braddock is  
5 able to connect to that room. So just accept that  
6 movement --

7 MR. HAYSLETT: I think he thought he was not  
8 supposed to be in the same room with the other  
9 witnesses.

10 THE COURT: Oh.

11 MR. HAYSLETT: I just told him it would be in 4.

12 THE COURT: We're coming.

13 MR. BRANSICK: Judge, I'm sorry. This is Scott  
14 Bransick. I don't see her notice. I just see a Lee  
15 Drew -- is that what I should be looking at?

16 THE COURT: No, just -- just stay right there,  
17 sir. You're good now. Actually, sir, you're going  
18 to see something that says join Room 4. Join Room 4,  
19 'cause you have to go to Room 4.

20 MR. BRANSICK: I haven't seen it yet.

21 THE COURT: Very interesting. All right. And  
22 would you join Room 4? All right. All right. If  
23 you see anybody else possibly there, just let me  
24 know -- that might need to be added.

25 All right. Mr. Braddock, are you in here?



1 You're going to unmute yourself and please have your  
2 camera on. Ms. Luna and Ms. Olszewski, I'm going to  
3 need you to unmute yourselves and have your camera on  
4 to be sworn in. All right. Let's see where we are.  
5 All right. Perfect.

6 Can all parties raise your right hand?

7 (Parties sworn.)

8 THE PETITIONER: I do.

9 THE COURT: You have to answer out loud.

10 THE RESPONDENT: Do.

11 THE COURT: Okay. Ms. Olszewski?

12 THE PETITIONER: I do.

13 THE COURT: All right. Thank you. All right.  
14 You can put your hands down. All right. So I have  
15 Ms. Jans -- is it Yanes or Yawns?

16 MS. JANES: It's Mrs. Yahn-ez.

17 THE COURT: Yahn-ez, that's right. All right.  
18 Janes and Mr. Perlman here. So Mr. Perlman is  
19 present in case 21-004904FD. Petitioner is Anna  
20 Paulina Luna. She is present and sworn in, and she  
21 is represented by Alan Perlman.

22 Mr. Kevin Hayslett and Mr. Cox are here present  
23 representing William Braddock, who is also present  
24 and sworn in in that case.

25 Then we have case number 21-004911FD. Erin



1 Olszewski is here with Ms. Janes as her counsel. Ms.  
2 Olszewski is already sworn in, and Mr. Braddock is  
3 also here sworn in with his counsel Mr. Hayslett and  
4 Mr. Cox.

5 All right. I did see that on September 9th  
6 there was a couple of motions that were filed by the  
7 respondent in both cases. And I -- I think we need  
8 to address those prior to going forward on the -- the  
9 remaining hearing. But let me just go through the  
10 preliminary matters once again with each party.

11 So Ms. Luna?

12 THE PETITIONER: Yes.

13 THE COURT: Okay. Ma'am, are you still seeking  
14 an injunction here today?

15 THE PETITIONER: I am.

16 THE COURT: Okay. And how do you know Mr.  
17 Braddock?

18 THE PETITIONER: I do not know him personally,  
19 other than him making these threats against me and  
20 seeking direct interactions with me.

21 THE COURT: Okay. And how long have you known  
22 of him?

23 THE PETITIONER: Since about May of this year.

24 THE COURT: And how long of an injunction are  
25 you seeking here today?



1 THE PETITIONER: I would like a permanent  
2 injunction.

3 THE COURT: Okay. All right. And Ms.  
4 Olszewski? Ma'am, are you still seeking an  
5 injunction here today?

6 THE PETITIONER: Yes, Your Honor.

7 THE COURT: Okay. And how do you know Mr.  
8 Braddock?

9 THE PETITIONER: I don't really know him. He's  
10 come to an event of mine, and then also contacted me  
11 to be on a health summit that he was setting up, Your  
12 Honor.

13 THE COURT: Okay. So an acquaintance? All  
14 right.

15 THE PETITIONER: Yes. Yes.

16 THE COURT: And how long of an injunction are  
17 you seeking here today?

18 THE PETITIONER: Permanent, Your Honor.

19 THE COURT: Okay. All right. And Mr. Hayslett,  
20 I take it by your filings your -- your client is not  
21 in stipulation to any of the injunctions?

22 MR. HAYSLETT: He is not, Judge.

23 THE COURT: Okay. All right. Just like to get  
24 that out of the way and get the preliminary  
25 information. All right.

1           So let me ask Mr. Perlman, are you prepared for  
2 a hearing today?

3           MR. PERLMAN: Yes, I am, Judge. And I just had  
4 a quick question. I'm not sure, did you put the  
5 witnesses in a different block?

6           THE COURT: I did. I have some of the witnesses  
7 in the waiting room, and then I couldn't figure out  
8 how to get Mr. DeMint to -- from a breakout room to a  
9 waiting room, so I just have him in a -- a -- a  
10 breakout room all by himself where I'll be able to  
11 move him. And Mr. Mackwell is also in a breakout  
12 room where I can --

13          MR. PERLMAN: I was just -- I was just curious  
14 because I saw a Mr. Tito on this room, and I was  
15 curious if he's a witness and with --

16          THE COURT: I don't have him as a listed witness  
17 in each case. I know in the past he's appeared as an  
18 observer, so I'm not sure. Is anybody intending upon  
19 calling him as a witness?

20          MR. HAYSLETT: We're not, Judge.

21          THE COURT: All right, Mr. --

22          MR. PERLMAN: Okay.

23          THE COURT: Mr. Perlman or Ms. Janes?

24          MS. JANES: No, Your Honor.

25          THE COURT: Okay. All right. So I believe he's

1 just present as an observer.

2 MR. PERLMAN: Understood. Thank you.

3 THE COURT: And then -- let's see. All right.  
4 And Ms. Janes, are you prepared to go forward in the  
5 hearing today?

6 MS. JANES: Yes, Your Honor.

7 THE COURT: Okay. And then Mr. Hayslett or Mr.  
8 Cox? I'm not sure --

9 MR. HAYSLETT: We are, Judge.

10 THE COURT: Okay. All right. So the motions --  
11 which motions do want to address first? We'll have  
12 to do it individual. I know that the -- the cases  
13 have been consolidated, but as we've discussed, each  
14 one are independently being considered on their  
15 individual facts and merits. So which motions in  
16 which case do you want to go forward with to start?

17 MR. HAYSLETT: Judge, maybe alphabetical. If we  
18 could start with -- and I titled Ms. -- Ms. Luna's  
19 first, the motion to dismiss.

20 THE COURT: Okay.

21 MR. HAYSLETT: Judge, the -- do want me at the  
22 podium? Where do you like me for Zoom purposes?

23 THE COURT: It -- it doesn't matter.

24 MR. HAYSLETT: Okay.

25 THE COURT: If you stay -- I -- well, and I'm

1 going to change my camera to your view -- which I  
2 think is this one -- so that the parties can see you.  
3 It might not be. Oh, no. It's definitely not that  
4 one. All right. There you -- go ahead. The parties  
5 can see you as well.

6 MR. HAYSLETT: Great.

7 THE COURT: All right. Go ahead, Mr. Hayslett.

8 MR. HAYSLETT: Judge, the -- and I -- I -- I  
9 don't know how much the Court's reviewed before this  
10 happened, but to give the Court some background, Ms.  
11 Luna and my client, prior to the injunction, were  
12 both potential candidates for Florida 13. So the  
13 people that -- many of the names in here -- you'll  
14 hear the name of Ms. Luna, obviously, my client, Ms.  
15 Makki, and Mr. Tito, I think, had talked about  
16 running for Florida 13. So this is a political  
17 issue, and -- and this surrounded political events.

18 THE COURT: Uh-huh.

19 MR. HAYSLETT: They are both -- well, I'll start  
20 with Ms. Luna. Ms. Luna's seeking an injunction  
21 based upon stalking. The Court is the most familiar  
22 person about stalking in the courtroom because that's  
23 what you do every day. So based upon that, I have  
24 had the opportunity to take the deposition of Ms.  
25 Luna, and I'm going to suggest there are two

1 different types of evidence that they would like to  
2 present forward. One is direct evidence of direct  
3 interaction, and there's indirect interaction. I'm  
4 going to address the direct interaction. And my  
5 motion to dismiss, there are two alleged -- or excuse  
6 me, four alleged interactions that Ms. Luna indicates  
7 were the basis of her stalking request of direct  
8 contact.

9 The first was on a radio show where she was  
10 posing as a candidate. And I think it's for purposes  
11 of the case law and purposes of this hearing, both  
12 petitioners are public figures. What I mean by that  
13 is they both hold themselves out to be advocates.  
14 They both have blue checkmarks under Twitter. I'm  
15 not sure what that means, but I hear it's important.  
16 But they -- they both are public figures for the --  
17 for the sake of case law.

18 The first incident was a radio call-in show  
19 where Ms. Luna was on the panel and my client called  
20 into that show. And that was the first interaction,  
21 and she alleges that is one of her predicate  
22 incidents of stalking. My client asked her some  
23 questions, part of which was based upon her service  
24 in the military. In one of her campaign ads, she  
25 shows herself wearing what purports to be a uniform

1 with a -- a firearm and a -- and a dog. My client  
2 was a former Marine. Ms. Luna was prior service as  
3 well. And I think Mr. Braddock asked her some  
4 questions, and I think so did Mr. Tito in that  
5 interaction about whether or not that was DOD  
6 approved. There's some specific guidelines when you  
7 can wear a -- a uniform in service, after service,  
8 and there was some conversations about that.

9 That was all about her candidacy and questions  
10 about her fitness for candidacy. Whether or not she  
11 was operating with the guidelines of a former  
12 military personnel and wearing a -- a -- a uniform.  
13 So that's the first episode of stalking. Now, the  
14 case law provided to the Court is that is there  
15 another basis for that interaction other than sheer  
16 harassment? And when you're a candidate, as the  
17 Court knows, because you've been there, you are --  
18 open yourself up to the scrutiny of the public. And  
19 she asked questions, answered questions, she  
20 interacted with Mr. Braddock in that radio show, and  
21 she alleges -- I assume, based upon her petition  
22 filing -- that was her first allegation of  
23 harassment. I would suggest, based upon the case law  
24 I provided the Court, based upon something called  
25 common sense, that that would not be a predicate for



1 stalking.

2           The second is the only physical interaction.  
3 And the physical interaction was a candidates' forum  
4 where she was a speaker and my client attended. She  
5 indicates in her deposition and in her -- in her  
6 petition and in the police report that she had  
7 contact with him. And he introduced himself to her  
8 and indicated that he was the one that called the  
9 radio show. He also indicated to her that he was  
10 going to be a candidate for Florida 13. He also  
11 introduced himself to her husband to indicate that he  
12 was going to run against her -- his wife. And she  
13 said that she had a brief interaction with him. I  
14 think she used the word creepy, an unsettled feeling.

15           There was no indications of threats, no  
16 indications of violence, there was no contact between  
17 the two. It was very brief. This was a candidates'  
18 forum. He was there as a potential candidate. The  
19 sole basis of his attendance there was not for  
20 harassment, but to do what candidates do, which is to  
21 go around eating chicken dinners and talking to  
22 crowds, and that's what he was doing there. And the  
23 case law is pretty clear that if there is a lawful  
24 purpose for him being there, that can't be a basis of  
25 stalking.

1           We have two other alleged -- now this is going  
2 to be through social media -- posts of stalking. One  
3 is which he posts on his Facebook page --  
4 allegedly -- his Facebook page a statement, and it  
5 reads, "When someone is so desperate to win a seat in  
6 Congress they file a false police report, they  
7 deserve to be called out. Just saying, this is all  
8 public record. What an ignorant human being. She's  
9 so threatened by candidacy she had to file false  
10 police reports. Thanks, Luna the Lunatic. You just  
11 solidified the fact that you're mentally not stable  
12 enough to serve and help my name recognitions.  
13 Thanks for that." That is the -- his post on his own  
14 Facebook page.

15           I provided the Court with some information about  
16 whether or not -- how stalking occurs in social  
17 media, and it's interesting. The courts have had to  
18 wrestle with this because they're looking at -- you  
19 know -- what is social media? The case that I  
20 provided to the Court says, well, social media is the  
21 new guy standing with a poster chanting -- you  
22 know -- I don't like you or down with the Vietnam  
23 War, whatever it is. They said this is a way for  
24 people to have interaction with folks and post  
25 opinions. And they're pretty clear that when you

1 post opinions, they can't be stalking unless you're  
2 sending that message directly to that person more  
3 than once. The problem with this post is a, it was  
4 on his own Facebook page; 2, it's not directly to Ms.  
5 Luna. It does indicate and reference Luna the  
6 Lunatic, but it doesn't -- it's not sent to her.  
7 Obviously, this is Constitutionally protected free  
8 speech. She's a candidate for U.S. Congress. If the  
9 standard is that people can't say mean things about  
10 people, then I presume that President Biden and  
11 former President Trump will be filing restraining  
12 orders against millions and millions of people. That  
13 makes no sense. Again, common sense prevails.

14 The last posting that was alleged of the direct  
15 contact is when a posting was made to a community  
16 group called Community Patriots Pinellas Official  
17 website -- or excuse me, Facebook group -- where  
18 William Braddock posted -- or I say attempted to be  
19 posted -- "Luna tried to take out all the potential  
20 primary opponents, including myself, at once, and  
21 it's backfired on her. More details to come." And  
22 it directs a story that was in the Tampa Bay Times.

23 Now what's interesting about this -- just  
24 because if you're a -- a real big Facebooker, you  
25 will know if you belong to Facebook groups, that the

1 moderator has the opportunity to either approve or  
2 decline that post. And on this case, the evidence  
3 will show that it was never approved; it was never  
4 posted. Even if it was posted, I think the case law  
5 protects my client on stalking, but it was never  
6 actually -- did we lose him, Judge?

7 THE COURT: No, they're all still there.

8 MR. HAYSLETT: Okay.

9 THE COURT: Go ahead.

10 MR. HAYSLETT: I do like the ski slope though.

11 That -- that -- that the -- this was actually  
12 never posted. So the -- that was a -- on the  
13 Community Patriots Pinellas Official. If you look at  
14 the case law, it says even it was posted and it never  
15 got posted to the public or never got posted for Ms.  
16 Luna to see it, then it still would not be a  
17 requisite stalking.

18 So those are the four predicate acts of stalking  
19 that she alleged that I would say are direct.  
20 Obviously, these Facebook posts aren't really direct.  
21 I mean, on Mr. Braddock's page is not direct. And  
22 even the post on the Community Patriots Pinellas  
23 Official website -- or Facebook group -- is not a  
24 direct post or direct contact with Ms. Luna. And it  
25 pretty clearly -- the case law says it has to be

1 directed at her -- even there was tweets billed in a  
2 case law where they mentioned people, and that's not  
3 a basis of a stalking. Those are the four predicate  
4 acts that I was able to pry out of Ms. Luna that she  
5 alleges was a basis for her stalking. There are a  
6 plethora of indirect -- indirect stalking. And I  
7 will lump those of indirect, which is statements,  
8 comments, alleged threats made to third parties, that  
9 were then relayed to Ms. Luna. So we have these are  
10 the four direct, alleged, direct communications. The  
11 indirect would be that Mr. Braddock allegedly said  
12 things about Ms. Luna to third parties. Those third  
13 parties then told Ms. Luna about what Mr. Braddock  
14 told them. I provided the case law, and the -- man,  
15 I looked pretty hard. I couldn't find any case in  
16 the State of Florida that allows a stalking  
17 restraining order to be filed based upon indirect  
18 contact. In fact, there was a case I provided to the  
19 Court where there was 22,000 emails that were sent,  
20 and they said that that didn't constitute stalking.  
21 So when you tell a third party, and that third party  
22 tells a petitioner, that is not a stalking case.

23 So our motion to dismiss is on the four alleged  
24 direct contacts, which I would indicate on the case  
25 law on the face valued do not constitute stalking,



1 and -- and I'll get to the -- and that's -- the  
2 indirect threats I think are on a motion in limine,  
3 but I'm going to suggest to the Court that the Court  
4 can't consider those 'cause they are indirect  
5 threats, and they don't satisfy the statute.

6 Now, there might be other remedies, and I'm not  
7 suggesting that Ms. Luna doesn't have other remedies.  
8 She could have gone forward with a criminal case,  
9 which she did, which got no info'd. There's a  
10 pending federal case that -- that may -- you know --  
11 bear fruit in a criminal arena. She has other civil  
12 actions, but we're here specifically on the issue of  
13 stalking. And as to the issue of stalking for a  
14 restraining order, what she's alleged doesn't get  
15 there.

16 THE COURT: All right. Mr. Perlman, do you want  
17 to address the motion?

18 MR. PERLMAN: I would, Judge. And thank you.  
19 And thank you for allowing me to appear via Zoom.

20 THE COURT: Oh.

21 MR. PERLMAN: This is obviously a very  
22 significant hearing for the petitioners. And I'm  
23 sure the Court was listening intently to that  
24 presentation. And I -- I -- I want to say a few  
25 things.

1           The first is perhaps thank you in that Counsel  
2           has just stipulated on the record that his client  
3           violated the injunction, and in particular, paragraph  
4           2, under no contact, where it says shall not directly  
5           contact petitioner, including any alternative means  
6           or use of social media. So to suggest there's no  
7           case is -- is kind of silly, because he just conceded  
8           the fact that he violated this Court's injunction by  
9           the direct posting on social media.

10           Besides that, Judge, I would object for the  
11           record to the extent Counsel provided testimony. He  
12           is not a witness, he's not under oath, and I think  
13           what he really argued was more of a closing argument  
14           or perhaps summary judgment based on the evidence to  
15           be presented, but surely not now. And what  
16           complicates things even more so is that his client  
17           took the Fifth, and under the adverse inference,  
18           practically everything he tried to dispute he is not  
19           being able to do so from an evidentiary perspective.

20           I want to talk about the direct and indirect  
21           legal analysis if you will. I think Your Honor has  
22           done this for a while and knows the law, and as the  
23           trier of fact, will easily assess what is or isn't  
24           something that constitutes harassment. And that  
25           definition, as the Court knows, is a reasonable

1 person's standard that would result in significant  
2 emotional distress. And there's no dispute that if  
3 there's a legitimate basis, that doesn't qualify.  
4 The evidence will -- is not intended with regard to  
5 the majority of the direct contacts, to suggest that  
6 they in and by themselves constitute the harassment.  
7 But it is relevant, Judge, to the Court's  
8 determination and evaluation and weight and  
9 sufficiency of the evidence, that the -- the  
10 respondent clearly targeted Ms. Luna, sought her out,  
11 blocked her appearance physically, tried to  
12 intimidate her, and then from that point, things got  
13 really bizarre and then worse, resulting in serious  
14 threats of harm, death threats, culminating in the  
15 police report and this injunction.

16 So I -- I think it's unfair to preclude our  
17 presentation so that Your Honor has a complete  
18 understanding of how this transpired. And so we  
19 think the motion to dismiss with regard to the direct  
20 contact is an evidentiary issue. It's not a basis to  
21 dismiss. It's -- it's going to require whether or  
22 not we satisfy the criteria it's a direct contact.

23 With respect to the indirect, I -- I made a  
24 couple notes. One was that I think Counsel said he  
25 hasn't found a case in the State of Florida. Well, I



1 find that troubling, because practically every  
2 appellate court in this state has disagreed with his  
3 legal proposition, and in particular, I've got cases  
4 from the First, Second, Third, and Fourth DCA that  
5 disagree -- that directed at does not mean, as a  
6 matter of law, directed to. And if you think about  
7 it, it's a silly proposition, that I could tell  
8 everyone in someone's circle that I'm going to cause  
9 them significant harm, yet that person, the target,  
10 can't get an injunction and has to wait and see if  
11 I'm actually going to do it or not. That's not the  
12 purpose of the statute. The purpose of the statute  
13 is to prevent the harm and not wait for the physical  
14 harm.

15 And the courts have consistently determined that  
16 this -- this -- this technical interpretation is not  
17 appropriate. And I've got the cases I can cite, but  
18 before I do that, Judge, the cases that they cited in  
19 their brief don't even apply. The first is the  
20 *Singletary v. Greever* case. That wasn't even under  
21 this statute. That was under repeat violence, which  
22 required physical injury or death. So I don't know  
23 why that case is being cited. It's completely  
24 inapplicable and it's the wrong statute.

25 And the other three that he relies upon -- the

1 analysis -- and if -- if -- if Counsel's position was  
2 right, the Court never would have engaged in analysis  
3 as to whether or not it was directed at -- and  
4 whether or not there was emotional distress. And  
5 unlike this case, in those other three cases, there  
6 was no threat of harm. They were more in the nature  
7 of defamation. And as a result, the court concluded  
8 they didn't satisfy the emotional distress component.  
9 And so really, all of those cases are not applicable.

10 But what's interesting, Judge, is they cite the  
11 Fourth DCA case of *Logue v. Book* at 297 So. 2nd 605  
12 19 -- 2020 case. And that case talks about the  
13 statute, and explains how that -- the interpretation  
14 that Counsel is suggesting that this Court adopt is  
15 just wrong. It's wrong as a matter of law, and it's  
16 wrong based on other decisions rendered by Florida  
17 courts. And it says, and I quote, "The plain words  
18 of the statute do not require that the communications  
19 be intended for transmission to the victim." And it  
20 relies in part on Webster's Dictionary as well.

21 And like I said, Judge, similar decisions were  
22 rendered by not only the Fourth, but the First,  
23 Second, and Third. If I had time, I probably could  
24 have found one from other -- the Fifth.

25 But anyways, the First District case is *Libersat*

1 v. State, 305 So. 3d 766, and it says "we thus reject  
2 Libersat's invitation to judicially ingraft  
3 requirements of 'content' in the stalking statute."

4 The next one is *Jones V. Jackson*, 2nd DCA, 67  
5 So. 3d 1023 (sic) and it says "indirect contact can  
6 constitute harassment."

7 The next is the 3rd DCA case -- and that is  
8 *Seitz v. State*, 867 So. 2d 421. This is the 3rd DCA,  
9 and it says, quote, "the statute does not require  
10 contact, direct or indirect, as a part of the offense  
11 of stalking; thus, we reject Seitz' first argument."

12 And I've already cited and quoted the 4th DCA  
13 case, Judge. So these are evidentiary issues.  
14 Whether or not we can satisfy the burden of more than  
15 one instance of the harassment that resulted in  
16 emotional distress, it serves no legitimate purpose.  
17 That's the standard. They are evidentiary. We'd  
18 like an opportunity to present the evidence, and for  
19 the same reasons that Counsel is mistaken with  
20 this -- his interpretation, contrary to the law of  
21 directed at, the -- the motion in limine when we get  
22 there, should fall as well with regard to the  
23 indirect communications.

24 I don't know if Your Honor has any questions. I  
25 don't know if Ms. Janes wants to supplement, but I'm

1 happy to respond to the extent I did not address any  
2 of the Court's concerns.

3 THE COURT: Okay. I don't. I guess Ms. Janes,  
4 are you going to be responding to this, or with your  
5 client's motion to dismiss, which I do think is  
6 factually different?

7 MS. JANES: That is correct, Your Honor. Ms.  
8 Olszewski's motion is factually different. I -- I --  
9 I -- I think Mr. Perlman stated very clearly what the  
10 flaws are with regard to the motion regarding the  
11 motion to dismiss Ms. Luna's petition. And I don't  
12 have anything further to add on that point.

13 THE COURT: Okay. Anything else, Mr. Hayslett?

14 MR. HAYSLETT: No, Judge.

15 THE COURT: All right. I do -- I have read the  
16 motion to dismiss, and it is based upon speculation  
17 as to what will be moved into evidence. I do think  
18 that it does appear to be a summation of anticipated  
19 evidence, or potentially a -- an argument of a  
20 summary judgment, and not necessarily a -- a legal  
21 grounds in which I can dismiss the petition prior to  
22 providing due process and having an evidentiary  
23 hearing. So I am going to deny the motion to dismiss  
24 on Ms. Luna's case.

25 And I'm -- I do think that there's case law out

1           there that does support -- the thing with stalking  
2           cases is it's a series of an event or a continuous  
3           episode, which has to be taken the totality of the  
4           circumstances. I do think that the case law does  
5           support that at times, threats to third parties, with  
6           certain factors that you need to consider when you're  
7           analyzing those threats, can be criminal offenses or  
8           amount to a -- a stalking, depending on the  
9           circumstances. So all the cases have to be taken  
10          factually in that it's a consideration. So I will  
11          dismiss -- I'm sorry, I will deny the motion to  
12          dismiss in Ms. Luna's case.

13                 So Mr. Hayslett, do you want to address the  
14          motion to dismiss in Ms. Olszewski's case at this  
15          point?

16                 MR. HAYSLETT: Well, Judge, I'm -- and to be --  
17          if I understand the Court's willing to hear the issue  
18          is you want to hear the evidence, which I'm fine. So  
19          I'll just -- I filed the motion. I understand what  
20          the Court's going to rule on that, but you want to  
21          hear the evidence before you make a decision?

22                 THE COURT: Yes, I -- I mean, I think that --

23                 MR. HAYSLETT: Understand.

24                 THE COURT: -- your -- in a way it is a summary  
25          judgment argument, but obviously, it's not filed as a

1 summary judgment, and that's --

2 MR. HAYSLETT: Correct.

3 THE COURT: -- a whole different procedural  
4 issue in the civil world -- and family is civil. But  
5 as far as it being a summation of anticipated  
6 evidence, it really is more of a closing or a summary  
7 judgment argument. So are you still going forward on  
8 the motion to --

9 MR. HAYSLETT: I'm still going for the motion to  
10 dismiss, but I assume the Court's going to rule it  
11 for Ms. Olszewski, but for the same basis, deny it.  
12 I don't need to -- my argument would be the same  
13 thing, which is it's based upon Ms. Olszewski's  
14 case -- it's not direct threats, it's conditional  
15 threats. What's different is, and I -- and I think  
16 the Court needs to hear the evidence in that case if  
17 it's going to take the same position.

18 THE COURT: Okay.

19 MR. HAYSLETT: And -- and that's what I'm  
20 saying. If -- if --

21 THE COURT: So -- so you're conceding that  
22 the -- I mean, essentially --

23 MR. HAYSLETT: I'm -- I'm -- I'm --

24 THE COURT: -- the -- the -- some of the  
25 evidence is going to be messages that were given to

1 her that will be given to Ms. Luna, so I --

2 MR. HAYSLETT: Correct.

3 THE COURT: -- I mean, I think that there is  
4 almost no way to hear all of Ms. Olszewski's case,  
5 except for a couple of other occurrences in which Ms.  
6 Luna was not present, without hearing part --

7 MR. HAYSLETT: I agree.

8 THE COURT: -- part of the other case. So --

9 MR. HAYSLETT: I still think you should grant  
10 the motion, but I understand the Court's ruling.

11 THE COURT: Okay. All right. And I do think  
12 that the -- the facts looked directly at Ms.  
13 Olszewski and looking at sometimes the same  
14 occurrence but was it directed to Ms. Olszewski and  
15 was it directed to Ms. Luna, and the -- the  
16 legitimacy of it will all be considered on a  
17 individual basis to understand whether that  
18 individual is in need of the protection of the  
19 injunction.

20 MR. HAYSLETT: I understand.

21 THE COURT: All right. So Ms. Janes, do you  
22 have any additional argument or anything? It -- it  
23 does sound like Mr. Hayslett is standing by his  
24 motion; however, he understands and is somewhat  
25 conceding that -- that the facts need to be explored

1 further in order to -- for him to raise this issue  
2 maybe after the presentation.

3 MS. JANES: Yes, Your Honor. The -- I -- I  
4 understand that, and I would agree that the facts  
5 need to come out here before the Court considers the  
6 legal arguments. And I believe that the facts will  
7 demonstrate that the elements of stalking have been  
8 met here.

9 THE COURT: Okay. All right. All right. And  
10 so now we have to discuss the motions in limine or  
11 motion to exclude.

12 MR. HAYSLETT: Judge, yes. The first one, if I  
13 could address Ms. Luna --

14 THE COURT: Uh-huh.

15 MR. HAYSLETT: One of the issues in this case on  
16 our motion in limine is kind of two-fold. There was  
17 a phone call where it is alleged that my client --  
18 Ms. Olszewski and my client had a phone call in which  
19 Ms. Olszewski recorded. And that was a recorded  
20 phone call, and that was orchestrated by petitioner  
21 Olszewski.

22 THE COURT: Okay. Well, let me stop there. Let  
23 me ask Mr. Perlman -- are you seeking to admit the  
24 telephone call into evidence in your case?

25 MR. PERLMAN: No. The -- the -- the recording



1 is not on the exhibit list, and to assist the Court,  
2 because like I said, today's hearing is pretty  
3 significant for the petitioners, we -- we would agree  
4 not to move Exhibit 9 into evidence, which is an  
5 article that referenced -- I believe -- that  
6 recording --

7 THE COURT: Okay.

8 MR. PERLMAN: -- or had a link to the recording,  
9 because we want to make sure Your Honor has the --  
10 the right record before it, not only for today but to  
11 the extent this matter goes up. So I would  
12 voluntarily take down Exhibit 9.

13 THE COURT: Okay. All right. So let me ask Ms.  
14 Janes. Are you intending upon putting the recording  
15 into evidence?

16 MS. JANES: No, Your Honor. We have no  
17 intention of introducing the recording into evidence.

18 THE COURT: Okay. All right. So as it is in  
19 respect to the actual physical recording, Mr.  
20 Hayslett, I think that -- that we don't need to have  
21 further discussion since it's not being sought to be  
22 admitted.

23 MR. HAYSLETT: Judge, the second part of the  
24 motion in limine would also include any statements  
25 alleged by my client during the illegal recording.

1           THE COURT: Okay. All right. And so give me  
2 your argument based upon that, because I do think  
3 that there is a -- a factual distinction between the  
4 actual recording and testimony of a person involved  
5 in the recording as to their independent  
6 recollection.

7           MR. HAYSLETT: Judge, our position is that they  
8 can't get in through the back door what they can't  
9 get in through the front door, which is the testimony  
10 that was obtained through an illegal recording.  
11 Obviously, the -- the other issue on that is that is  
12 still an open case here in the Sixth Circuit, so with  
13 Ms. Olszewski's testimony regarding her doing that,  
14 she puts herself in jeopardy of a third-degree  
15 felony, and any evidence obtained by that recording,  
16 i.e. her recollection as to the words, the  
17 conversation, anything to do with that, would have  
18 been fruits of the poisonous tree, i.e., that that  
19 testimony would be received based upon her  
20 inclination and intent and plan to illegally record  
21 that conversation. So our position would be any  
22 testimony alleged to have come from my client during  
23 that illegal recording would also be inadmissible.

24           THE COURT: Okay. All right. And so Mr.  
25 Perlman, what is your argument based upon the actual

1 testimony, we'll call it, assuming that it's going to  
2 be by Ms. Olszewski, who was a party to the  
3 conversation. What is your argument as to that?

4 MR. PERLMAN: Sure. My -- Judge, clearly that's  
5 relevant. There's no basis to exclude it. She has  
6 personal, first-hand knowledge that the reference to  
7 fruit of the poisonous tree is -- is not applicable.  
8 This is not a criminal proceeding. The -- and to the  
9 extent there is a objection, it would be limited  
10 solely to the actual recording, which we've already  
11 dealt with, and that query is moot. There's --  
12 there's no basis whatsoever under a rule that would  
13 preclude the petitioner from testifying in terms of  
14 those comments that -- and her understanding from  
15 that phone call, as well as the excited utterance  
16 when she turned around and contacted the other  
17 petitioner, Ms. Luna.

18 And I -- I don't even know if that was part of  
19 his motion in limine either, Judge. So I think  
20 there's a little bit of a surprise here. But  
21 regardless, putting that aside, I think there's no  
22 basis under rule of law in which to exclude the  
23 testimony of a petitioner based on first-hand  
24 knowledge.

25 THE COURT: Okay. All right. And Ms. Janes,

1           what do you -- what is your position?

2           MS. JANES: I would certainly adopt the  
3 arguments that Mr. Perlman has -- has made. And I  
4 would add to that -- you know -- Mr. Hayslett  
5 suggested that what ought to be excluded is testimony  
6 obtained through an unlawful recording. We're not  
7 planning to introduce testimony obtained through an  
8 unlawful recording. We are planning to introduce  
9 testimony obtained through Ms. Olszewski's personal  
10 participation in a telephone call based on her  
11 independent recollection of the contents of that  
12 telephone call. There's no basis to exclude that.

13           With regard to Mr. Hayslett's expression of  
14 concern for the fact that there is potentially  
15 criminal exposure here to Ms. Olszewski, based on her  
16 testimony, Ms. Olszewski has -- I think --  
17 courageously made the decision that she is going  
18 forward. She is not invoking her Fifth Amendment  
19 rights because she wanted to be able to tell the  
20 truth about what happened here. And she feels like  
21 her safety and Ms. Luna's safety are more important  
22 stakes than a potential prosecution that -- that  
23 there is no evidence is in the works. And if -- and  
24 in fact, Ms. Olszewski has been reassured by law  
25 enforcement that under the circumstances, they did

1 not view her conduct as inappropriate.

2 THE COURT: Okay. Well, I think we have two  
3 separate things. The -- the Fifth Amendment really  
4 applies to the -- the recording. What we're talking  
5 about is her testimony related to -- to her  
6 recollection of the conversation. So I'm not sure  
7 there is as much of a Fifth Amendment issue since  
8 we're not going to be discussing the -- the recording  
9 of it. But anything else related to her  
10 independent -- Ms. Janes, her independent testimony  
11 related to the conversation.

12 MS. JANES: And -- and Your Honor, yes, we're --  
13 we're perfectly willing to stipulate to the exclusion  
14 of any evidence relating to the recording --

15 THE COURT: Uh-huh.

16 MS. JANES: -- of the telephone call, and limit  
17 the evidence solely to the contents of the telephone  
18 call and Ms. Olszewski's independent recollection of  
19 the contents of the telephone call.

20 THE COURT: Okay. All right. And so Mr.  
21 Hayslett, anything else you want me to consider?

22 MR. HAYSLETT: Well, Judge, there's two things.  
23 You know, I understand the phone call. The other  
24 issue is it goes to whether or not this is stalking.  
25 If you have an individual that is so terrified and so

1       scared that in an effort to be afraid, they say hey,  
2       call me on the phone so I can record your  
3       conversation; the fact that she did record is  
4       relevant, not the recording itself. But it goes to  
5       her state of mind as whether or not this is an act of  
6       stalking or harassment, or is she inviting this and  
7       attempting to create evidence for political gain for  
8       her friend, Ms. Luna.

9               So I understand that the recording would be  
10       inadmissible, 'cause it is, but I think the fact that  
11       she decided to record it, planned to record it, and  
12       then take that information, share it with Ms. Luna,  
13       play it for Ms. Luna to hear, goes to the basis of  
14       whether or not it's a requisite act of stalking. So  
15       I think it still goes back to -- and I understand the  
16       Court's ruling on the issue of the statements would  
17       come based upon recollection, but I think that the  
18       context of which those statements came in, the Court  
19       can consider whether or not she was so afraid and so  
20       in fear that she decided to say call me up and let me  
21       record this conversation, 'cause that way I will  
22       be -- you know -- perfected -- the record will  
23       reflect it as to my fear.

24               I think the Court can consider that in regards  
25       to whether or not this is an act of stalking against

1 Ms. Olszewski.

2 THE COURT: Surely. And I think I've heard  
3 the -- the -- the circumstances surrounding it might  
4 be stipulated to it in relation to that, but as far  
5 as the conversation that ensued, I do -- I do find  
6 that its testimony can be made. This is not a  
7 criminal case. The -- the recording wasn't made at  
8 the direction of any kind of criminal office, and I  
9 do think that under the civil cases, that that  
10 information can still be testified about. So I'm  
11 going to deny the motion in limine as to Ms.  
12 Olszewski testifying related to the contents of the  
13 conversation as her recollection of that. And there  
14 are very fair and right points that can be made on  
15 cross-examination, which I -- I've heard as part of  
16 your argument.

17 MR. HAYSLETT: Judge, the other part of our  
18 motion in limine as to both petitioners would be as  
19 to indirect alleged threats or harassment. The Court  
20 kind of alluded to it, and I -- I -- I sense where  
21 the Court's going, but so the record's clear, we're  
22 moving to limit the testimony of any third parties  
23 that would allegedly testify that Mr. Braddock  
24 contacted them, made statements in relationship to  
25 either Ms. Luna or to Ms. Olszewski. Our position is

1           that those third-party contacts and third-party  
2           conversations could not be considered or used as a  
3           predicate act or predicate threat for the purposes of  
4           stalking.

5           THE COURT:   Okay.   And Mr. Perlman?

6           MR. PERLMAN:   Thank you, Judge.   And -- and  
7           just -- just real quick.   I -- I -- just want to  
8           touch on this, then I'll get to Your Honor's direct.  
9           But the earlier presentation in terms of the phone  
10          call and how that went about, again, I think Counsel  
11          is testifying.   I don't think my -- neither  
12          petitioner is stipulating as to those assertions, and  
13          I think Your Honor is right, he can deal with that in  
14          cross.

15          With respect to this portion of the motion, I  
16          think it's no different than the earlier request  
17          seeking dismissal on improper interpretation of the  
18          statute.   It's evidence, it's a totality of the  
19          circumstances, as Your Honor indicated, and it goes  
20          to the weight and sufficiency of the standard that  
21          this Court is going to analyze in terms of whether or  
22          not there's been a violation under the applicable  
23          statute or not, such that an injunction should be  
24          issued.   So I -- I think for the same reason that the  
25          motion to dismiss was denied, this motion in limine



1 with regard to the indirect communications is  
2 likewise improper.

3 THE COURT: Okay. And so let me just ask this.  
4 So are we talking about communications to third  
5 parties that were not related to either Ms. Olszewski  
6 or Ms. Luna, are there any of those out there?

7 MR. HAYSLETT: I'm not -- I'm not tracking,  
8 Judge. You mean -- these are all going to be  
9 statements, I believe, third parties are going to say  
10 Mr. Braddock had contact with me and said X.

11 THE COURT: Okay. But then are they going to  
12 testify that after he said X, I called Ms. Luna --

13 MR. HAYSLETT: Yes.

14 THE COURT: -- or I called Ms. Olszewski --

15 MR. HAYSLETT: Correct. Correct.

16 THE COURT: -- so there is a conveyance of that  
17 information to --

18 MR. HAYSLETT: Correct. I think it --

19 THE COURT: -- to the petitioners?

20 MR. HAYSLETT: Yes. Not -- not that this was  
21 out in the ether and told a person and that --

22 THE COURT: I just want to make sure.

23 MR. HAYSLETT: -- she wasn't aware of it. I  
24 think either these folks communicated with her --  
25 they were friends, cohorts, some she knew, some she

1           didn't know, that made contact with her and said hey,  
2           by the way, this was our conversation.

3           THE COURT:   Okay.  All right.  So I am going to  
4           be hearing of a connection between that communication  
5           and ultimately Ms. Luna or Ms. Olszewski learning of  
6           this situation?

7           MR. HAYSLETT:  I anticipate that will happen,  
8           Judge.

9           THE COURT:  Okay.  Just wanted to double-check.  
10          If I hear -- you wouldn't believe what I hear each  
11          day.

12          MR. HAYSLETT:  No, I --

13          THE COURT:  So -- all right.  And Ms. Janes, any  
14          other -- any argument as to the third party --  
15          potential third-party testimony related to its  
16          inadmissibility?

17          MS. JANES:  Your Honor, I -- I -- I would echo  
18          what Mr. Perlman said going back to counsel's  
19          statements regarding the recording.  I would very  
20          strongly echo what Mr. Perlman said -- you know --  
21          with regard to counsel testifying, and -- and  
22          specifically, counsel testifying to speculatively  
23          to -- to -- to assumptions that I believe will not be  
24          borne out by testimony, but with regard to the reason  
25          the recording was made, and also counsel's

1 speculation -- you know -- regarding that there would  
2 be -- that there is a -- a -- an open investigation  
3 on this, which I -- I do not believe to be the case.

4 With regard to the -- what we're calling  
5 indirect threats here, I would rest on Mr. Perlman's  
6 statements, which I think accurately summarize the  
7 law here.

8 THE COURT: Okay. And I -- I do believe that  
9 there are several court cases that indicate  
10 injunctions being upheld are -- are not -- that part  
11 of the testimony relates to third-party threats, and  
12 there's a lot of factors that I need to consider  
13 about not only daytime plays, reasonableness, how the  
14 parties -- if any -- have any relationship to one  
15 another -- there's a couple of factors and guidelines  
16 that are -- that are given by the -- the case law  
17 that -- that I will definitely be looking at to  
18 consider at the time that it's made or -- or the  
19 reasonableness of the conveyance of that information  
20 and the relationship between any of the parties and  
21 the parties in which they've -- the third party is  
22 associated.

23 So I'm going to deny that motion in limine, but  
24 I -- I will allow you to renew objections if you find  
25 that there isn't a sufficient predicate laid through

1 the testimony prior to that statement coming in.

2 MR. HAYSLETT: Judge, the -- the only thing I'd  
3 say is I know Ms. Janes indicated law enforcement  
4 made a statement as to Ms. Olszewski's third-party  
5 recording. I don't want her to rely on that. I'm  
6 not --

7 THE COURT: I -- I don't ever. I --

8 MR. HAYSLETT: Well, I just -- I just --

9 THE COURT: I will go over a Fifth Amendment  
10 conversation with Ms. Olszewski prior to her  
11 testimony. A third-degree felony statute of  
12 limitations is a lot longer for a non-arrest case.

13 MR. HAYSLETT: That's what I --

14 THE COURT: And so therefore whether an  
15 investigation is open currently, whether one will be  
16 in the future, or one -- I never assume. So I will  
17 have that conversation regardless of whether they had  
18 an immunity guarantee because there's also a civil  
19 case that could potentially be involved. So --

20 MR. HAYSLETT: Well, there's two issues. A,  
21 it's the non-arrest. A lot of people don't do this  
22 to understand non-arrest. Secondly, it'd be a  
23 violation of pre-trial release, which would be a  
24 potential problem as well. So there's a couple  
25 issues with Ms. Olszewski that -- that probably

1 should be addressed just --

2 THE COURT: Are you telling me she's on pre-  
3 trial release?

4 MR. HAYSLETT: She is -- she's on pre-trial  
5 detention right now, Judge.

6 THE COURT: Okay. All right. Okay. So --

7 MS. JANES: No, she's not on pre-trial detention  
8 right now. She's coming to us from her home.

9 THE COURT: Okay.

10 MR. HAYSLETT: No, no, no, no. Meaning that  
11 there is a pending bond, Ms. Janes. She's got a  
12 pending criminal case in this county.

13 MS. JANES: Yes, I understand that. She is not  
14 currently detained, obviously.

15 MR. HAYSLETT: No, no, I'm just -- I'm -- I'm  
16 just saying that if --

17 THE COURT: He said release, not --

18 MR. HAYSLETT: I -- I -- yeah, release. I'm  
19 sorry, release. I'm just saying that if there was a  
20 new charge, she'd be held without bond. That's all.

21 THE COURT: Okay. Well, I -- I'm not even going  
22 to go there. I'm going to have a conversation with  
23 Ms. Olszewski no matter what, even -- it's her only  
24 privilege to -- to waive her Fifth Amendment or to  
25 testify or invoke it at any time during her

1 testimony, and whether -- whether there's future  
2 civil cases, whether there's future criminal cases or  
3 anything like that, regardless of anything that's  
4 said, or --

5 MR. HAYSLETT: Understand.

6 THE COURT: -- guarantees or anything that's  
7 made, I always have an additional conversation  
8 because sometimes things change, and I just want to  
9 make sure that everybody is -- is acting and making  
10 their decisions. So I don't -- I don't know.

11 We'll -- I guess we'll handle that when we come to  
12 it, but I have every intention of discussing Fifth  
13 Amendment privilege with Ms. Olszewski when she  
14 testifies -- or if she --

15 MR. HAYSLETT: Perfect.

16 THE COURT: -- becomes a witness. Okay.  
17 Anything else we need to discuss at this point?

18 MR. HAYSLETT: No, Judge.

19 THE COURT: Anything else? Is everybody ready  
20 to start with the hearings and the testimony?

21 MR. PERLMAN: Judge, this is Alan Perlman. I  
22 was just going to request maybe a five-minute  
23 restroom break before we start?

24 THE COURT: That's fine. And now, here's what  
25 your -- what's your position? In most injunctions,

1 we don't do elaborate opening statements or  
2 arguments. We really just get into the testimony and  
3 then leave the argument for closing arguments. I  
4 know a lot of the testimony -- or that most  
5 injunction hearings are not always attended by  
6 attorneys, so I just don't know what anybody's  
7 position is as to whether they want to make an  
8 opening statement.

9 MR. HAYSLETT: Judge, I -- I don't need an  
10 opening statement, Judge.

11 THE COURT: Okay. All right. So what about  
12 you, Mr. Perlman or Ms. Janes?

13 MR. PERLMAN: Judge --

14 MS. JANES: I agree. I think we should -- oh,  
15 go ahead, Mr. Perlman.

16 MR. PERLMAN: No, no. After you, I'm sorry.

17 MS. JANES: I -- I was just going to suggest  
18 that I think it would be more appropriate to go into  
19 the testimony and then make any argument that's  
20 necessary in the summations.

21 THE COURT: Okay. All right. And Mr. Perlman?

22 MR. PERLMAN: Judge, not surprisingly, obviously  
23 I concur with whatever Your Honor thinks is the most  
24 efficient way to proceed.

25 THE COURT: Okay. Well, if everybody is -- I

1 mean, I think everybody has -- we have a petition, we  
2 have our pleadings, we have our motions, so it would  
3 be my intention just to go straight into the  
4 evidentiary portion and have Mr. Perlman start with  
5 his presentation of the evidence. I know Ms. Janes  
6 seems to get the short end of the stick, and then  
7 always be saying that she -- she might have the same  
8 brilliant arguments that Mr. Perlman has, but kind of  
9 just happens when we have a simultaneous case going  
10 on, and obviously, Mr. Perlman's client, it's a  
11 little bit of different context.

12 So if you -- either of you wants to start or  
13 call certain people, I'm sure that you have discussed  
14 it, and so obviously, any direct examination by Mr.  
15 Perlman will then be turned over to Ms. Janes, and  
16 then will be turned over to Mr. Hayslett and Mr. Cox,  
17 and then redirect will be given to both petitioners'  
18 attorneys as well. So it does complicate things, but  
19 I'm going to allow the additional direct and if the  
20 parties agree, we can exceed the scope of the direct,  
21 rather than having the respondent -- if they are  
22 putting on a case -- having to recall witnesses and  
23 release them after their direct testimony.

24 So Mr. Perlman and Ms. Janes, are you in  
25 agreement that Mr. Hayslett or Mr. Cox could go



1 beyond the scope of direct examination in order to  
2 handle any particular issue that might arise so that  
3 we don't have to recall witnesses if -- if they're  
4 put on a case?

5 MS. JANES: Yes, Your Honor.

6 THE COURT: Mr. Perlman?

7 MS. JANES: Mr. Perlman?

8 MR. PERLMAN: I was allowing Ms. Janes to go  
9 first, Judge, so that we could share. But I -- I --  
10 we actually did discuss this, and I think that Your  
11 Honor has exact same thinking that we both concluded  
12 as well, so we -- we would applaud that, yes.

13 THE COURT: Okay. All right. So we'll allow  
14 for the scope to be exceeded during cross-examination  
15 in order to best use the witnesses' time, as well as  
16 allow them to be released after their testifying, so  
17 that we won't have to recall witnesses and -- if the  
18 respondent puts on a case. Okay?

19 Anything else?

20 MR. HAYSLETT: No, Judge.

21 THE COURT: All right. Five minutes enough?  
22 Or -- let's give you eight minutes. We'll come back  
23 at half-past. So 11:30, we'll reconvene, and we'll  
24 start with witnesses.

25 MS. JANES: Thank you, Your Honor.

1 MR. PERLMAN: Judge?

2 THE COURT: Yes?

3 MR. PERLMAN: Does Your Honor -- this is just a  
4 thought, I don't know what Your Honor typically does,  
5 but does it make sense maybe to bounce into the other  
6 room to some degree to let -- to let everybody know  
7 that -- you know -- we're going to be -- that they're  
8 on hold and that they'll be another at least 30  
9 minutes or something like that?

10 THE COURT: Yep. What I'll do is I'll have one  
11 of my assistants go into the other room and let the  
12 witnesses know that we're going to start testimony at  
13 11:30, and just to -- to stand by. It's my intention  
14 to go as far -- I -- I'm not intending upon taking a  
15 lunch hour, because I -- I do want to resolve it. If  
16 anybody has any medical issues in which they need  
17 some time or a break during this period for lunch or  
18 for a -- a short snack, please just let me know when  
19 we reconvene, and I will be respectful of that, but  
20 it might not be more than 15 minutes. All right?

21 MR. PERLMAN: Thank you.

22 THE COURT: All right.

23 MS. JANES: Thank you.

24 THE COURT: I'll have my assistant bounce in and  
25 talk to all the potential witnesses and let them

1 know.

2 MR. PERLMAN: Thank you. Thank you.

3 MR. HAYSLETT: Judge? Could we go to 11:35?

4 I'll go down and grab a drink real quick, too.

5 THE COURT: All right. I'll make it 11:35 --

6 MR. HAYSLETT: Thank you.

7 THE COURT: -- only because we're on the fourth  
8 floor and the cafeteria is pretty far away from where  
9 we are, so -- 11:35.

10 MR. PERLMAN: Thank you.

11 THE COURT: Thank you. All right.

12 (Recess.)

13 THE BAILIFF: All rise. Court is back in  
14 session.

15 THE COURT: All right. Bring them here. Have a  
16 seat everyone. All righty. Seeing everybody get  
17 back in. All right. Mr. Braddock are you there?

18 THE RESPONDENT: Yes, Your Honor. I'm here.

19 THE COURT: Okay. All right. I just wanted to  
20 make sure that all the parties were present prior to  
21 starting with any testimony.

22 All right, and if somebody does need to go off  
23 camera to sneeze or anything like that, that's fine.

24 All right. So I am going to ask Mr. Perlman, do  
25 you want to call your first witness?

1 MR. PERLMAN: I do, Judge. I just want to make  
2 sure that Ms. Janes, Ms. Luna, and Ms. Olszewski are  
3 on the screen.

4 THE COURT: They are. And what I can do, is I'm  
5 not sure if you have -- in the upper-right hand  
6 corner, of everybody's --

7 MR. PERLMAN: I see, I see "view".

8 THE COURT: -- screen is the view. And it can  
9 go to "get from gallery" to that. So I'm going to  
10 put mine now in the courtroom on "speaker view" just  
11 so it's like a witness is testifying. And it'll  
12 bounce back and forth on that.

13 But if you have any questions or want to see  
14 who's -- who else is around, that -- that option is  
15 available. Okay?

16 MR. PERLMAN: Okay. I just want to confirm that  
17 my client is there as well. Is Ms. -- Ms. Luna, are  
18 you there?

19 THE PETITIONER: Yes, I'm here.

20 MR. PERLMAN: Okay. Fabulous. Okay, ready to  
21 proceed, Judge.

22 THE COURT: All right. Call your first witness,  
23 Mr. Perlman.

24 MR. PERLMAN: Thank you, Judge. We would -- I  
25 would call Ms. Olzsew -- Olszewski.

1 THE COURT: All right. Ms. Olszewski, you have  
2 already been sworn in as a party in this case. You  
3 may inquire, Mr. Perlman.

4 THEREUPON,

5 ERIN OLSZEWSKI,  
6 the witness herein, having been previously sworn, was  
7 examined and testified as follows:

8 MR. PERLMAN: Thank you very much, Judge.

9 DIRECT EXAMINATION

10 BY MR. PERLMAN:

11 Q Can you -- do you have a relationship with Ms.  
12 Luna?

13 A Yes.

14 Q And -- and how do you know her?

15 A She's just an acquaintance friend of mine.

16 Q Okay. And how do you know Mr. Braddock?

17 A Mr. Braddock had, I guess, shown up at an event  
18 that I was speaking at. And then had contacted me through  
19 another friend in order to request that I speak on a  
20 healthcare summit that he was putting together.

21 Q And were -- were there substant communications  
22 you had with him prior to the call on June 8th?

23 A Yes.

24 Q And during any of those communications, was he  
25 attempting to be introduced, reach, or contact Ms. Luna?

1           A       Not through me. But he did have very foul words  
2 to say about her to me.

3           MR. HAYSLETT: Judge, I'd object as to hearsay.  
4 What the follower said to her --

5           THE COURT: No, I -- I think he said -- she said  
6 "foul words."

7           MR. HAYSLETT: Foul words? I can't hear -- I'm  
8 sorry. I can't hear.

9           THE COURT: Okay. Did you say "followers" or  
10 "foul words"? Followers was not even, like, a real  
11 topic until we had social media. So did you say  
12 "foul words", or "fol -- followers"?

13          THE WITNESS: I -- I did say foul words.

14          THE COURT: So go ahead. So --

15          MR. HAYSLETT: Foul words. Got it. Sorry.

16          THE COURT: -- overruled. All right. Go ahead.

17          Q       (By Mr. Perlman) And these were communications  
18 from Mr. Braddock about Ms. Luna, correct?

19          A       Yes.

20          Q       And did you find those foul words to be odd at  
21 the time?

22          A       Yes. Yes, I did. Having not really -- he  
23 didn't really know me any -- at all, at that time. And it  
24 was bizarre behavior to discuss someone that he -- I may  
25 or may not know in a really derogatory way.

1 Q And did -- did it appear during this -- these --  
2 these communications that Mr. Braddock was fixated on Ms.  
3 Luna?

4 A Absolutely.

5 Q And to a point where you wanted to warn Ms.  
6 Luna, correct?

7 A Correct.

8 Q And is that because you were concerned for her  
9 safety and well-being?

10 A Yes.

11 Q And so -- and did you reach out to Ms. Luna,  
12 explain your concern with regard to Mr. Braddock's  
13 actions?

14 A Yes.

15 Q And was that pretty much your experiences with  
16 Mr. Braddock up until the call on June 8th?

17 A Yes.

18 Q Okay. And you -- you -- you were present when  
19 counsel made his presentation to the Court, correct?

20 A Correct.

21 Q Did Mr. Braddock ask you to call him that  
22 evening?

23 A Yes.

24 Q And did he tell you why?

25 A He stated that it's something that I cannot

1 repeat. And it was derogatory in nature towards him  
2 running for the congressional seat and Anna.

3 Q Okay. So -- it's something -- did he -- do you  
4 recall if he stated to call him because it's nothing he  
5 wanted to put in a text?

6 A Correct.

7 Q Okay. And so at the request of Mr. Braddock,  
8 did you call him?

9 A Yes.

10 Q And during that call, did he threaten harm to  
11 Ms. Luna?

12 A Yes.

13 Q Did Mr. Braddock make reference to a "hit squad"  
14 to eliminate and remove Ms. Luna?

15 A Yes. Mr. Braddock had told me that he's  
16 well-connected with a Freemason that has endless amounts  
17 of money, that he also has access to a Russian and  
18 Ukrainian hit squads.

19 Q And did Mr. Braddock explain how he was going to  
20 have Ms. Luna during that call?

21 A He asked -- sorry. I asked him, and he said  
22 that all he has to do is make a phone call. And then I  
23 asked him how they would do it. Would it be a sniper?  
24 Would it be -- you know, how -- how would that happen?  
25 And his words were that it would be "close battle combat".



1           And in military terms, that's up and personal. And  
2 that she wouldn't even see it coming because they would  
3 befriend her. And that way they could make sure that she  
4 was dead. And within 24 hours, he would receive  
5 confirmation.

6           Q     And how would he re -- how did he say he would  
7 receive confirmation within 24 hours?

8           A     Through his contacts with the hit squads.

9           Q     Did he say they would send him photographs at  
10 that time?

11          A     Yes.

12          Q     Did he make any comments that would have  
13 referenced your safety during that call?

14          A     Yes.

15          Q     And what were they?

16          A     In multiple times throughout that call, he made  
17 sure that I knew I better not say anything. If I do say  
18 something, then I will be collateral, and he would hate to  
19 do that. But it would be for the greater good of the  
20 country. And that he knows I have three children. And he  
21 would hate to -- hate to do something like that.

22          Q     Okay. Well, Ms. Janes is going to have some  
23 further questions for you, but we -- I just have a couple  
24 more here. Were you very concerned during, or at the  
25 conclusion of this phone call for the safety of Ms. Luna?

1           A     I was more than concerned.  I -- I do believe  
2 that he had a plan.  He's been very angry in the previous  
3 phone conversations that I've had with him.  And he had  
4 the people.  And he also stated that, you know, once he  
5 calls it, it's kind of out of his hands.

6           So he made it seem that he has contacts that all he  
7 has to do is make a phone call.  And they would never be  
8 connected to him.  Because if it was connected to him,  
9 he'd never be able to win the seat.  But he did state that  
10 he had a plan to leave the country.  So he has multiple  
11 different ways that he would leave the country, which is  
12 also concerning to me.

13          Q     Okay.  Thank you.  And my understanding, there  
14 was a second and separate communication on the 8th, or  
15 early morning of the 9th between Mr. Braddock and  
16 yourself.  Is that correct?

17          A     Yes.

18          Q     And it's temporally different than this phone  
19 call, correct?

20          A     Yes.

21          Q     And what was that communication -- what was the  
22 second and later communication to you?

23          A     This was after the phone call.  And it was sent  
24 through a voice text.  iPhones have voice text that  
25 ultimately disappear.  I think that's why he sent it.  So

1 it wasn't in writing. But that voice text to me stated  
2 that I better not say anything. And that's what -- it --  
3 it's a warning.

4 And pretty much doubling down on the fact that, you  
5 know, if -- if I tell anybody this, then I will also be  
6 collateral. In -- in other words, he will also call the  
7 hit squad on me.

8 Q And when you played that voice text on your  
9 phone, it indicated that it was from Mr. Braddock,  
10 correct?

11 A Correct.

12 Q And it was Mr. Braddock's voice on the message,  
13 correct?

14 A Correct.

15 MR. HAYSLETT: Judge, I -- I -- I don't mind him  
16 asking questions. But on the 8th leading question, I  
17 would object.

18 THE COURT: I'm sorry. That objection was  
19 leading?

20 MR. HAYSLETT: Yes.

21 THE COURT: Okay. I'll sustain that.

22 Q (By Mr. Perlman) Whose voice was on the  
23 recording?

24 A William Braddock.

25 Q And who sent the voice text to you on your

1 phone?

2 A William Braddock.

3 Q And you're familiar with Mr. Braddock's voice  
4 from your prior communications with him, correct?

5 A Yes.

6 Q Okay. And what happened next? Is -- is this  
7 when you contacted Ms. Luna?

8 A Yes.

9 Q Okay. And how did you contact her, and what did  
10 she say?

11 A I'm going to take that back, Alan. I'm sorry,  
12 Mr. Perlman. Right after the original phone call, I  
13 called Anna to let her know what -- what he just said,  
14 because I was very worried. And it was during that  
15 conversation when I got the -- the second voice text.

16 Q Okay.

17 A And after I got that voice text, I got off the  
18 phone, and I immediately called law enforcement. And I  
19 told Anna to do the same.

20 Q Okay. And when you called Ms. Luna from the  
21 initial phone call with Mr. -- Mr. Braddock, and you told  
22 her that Mr. Braddock had threatened her life?

23 A Yes.

24 Q And you explained the level of detail that he  
25 shared with you on that call that evening?

1           A     Yes.

2           Q     And honestly, what was your -- what was your  
3 state of mind at the time?

4           A     I was -- I was shook. I actually, I -- I had to  
5 catch my breath, because I've never in my life heard an  
6 actual threat like this with a plan. And just the  
7 nonchalant way of how he was talking about it as if he's  
8 possibly done it before.

9                     And more importantly, the fact that you know, he  
10 knows that I'm single mother, and he brought up my  
11 children into this, which -- I don't want anything to  
12 happen to them. That's it, so.

13           I was just -- I'm scared.

14           Q     Understood. If -- if you need a minute, let me  
15 know.

16                     MR. PERLMAN: But I -- I think that that's all I  
17 have for this witness and would open up to Ms. Janes,  
18 Judge.

19                     THE COURT: All right. Ms. Janes, any  
20 additional direct?

21                     MS. JANES: Yes, Your Honor. Thank you.

22                                     DIRECT EXAMINATION

23 BY MS. JANES:

24           Q     Ms. Olszewski, did you initiate the first  
25 contact you had with Mr. Braddock?

1           A     No, he sought me out through friends of mine.  
2 And the first contact actually -- I take it back, I was  
3 speaking at an event that -- that he came to. That was  
4 the very first contact in person.

5           Q     And I'm going to ask you a few questions that  
6 are directed at some comments that -- the Mr. Hayslett  
7 made. Are you in any way affiliated with Ms. Luna's  
8 campaign?

9           A     No, I've never campaigned for her. I've never  
10 been affiliated with the campaign at all.

11          Q     Were your reasons for coming forward with regard  
12 what had -- had been said to you in any way political?

13          A     No, not at all. This is -- this is about saving  
14 somebody's life. I'm a nurse and that's what we do, you  
15 know, that's what I do. And it has nothing to do with  
16 anything political at all. It has to do with a human  
17 being. And I don't care where they stand on the political  
18 fence. A life is a life, is a life. And it -- it's not  
19 political for me.

20          Q     And I'm going to just touch very briefly on your  
21 background. You mentioned already that you're a  
22 registered nurse. And you also have a military  
23 background?

24          A     Yes.

25          Q     And does your background as a nurse and as a

1 veteran inform how seriously you took these events?

2 A Yes.

3 Q Okay. I'm going to turn to the events of --  
4 well, actually, let's -- let's back up. Before we talk  
5 about the -- the call on June 8th and June 9th, you  
6 mentioned that Mr. Braddock's conversations with you  
7 leading up to that night had made you uncomfortable.  
8 What -- what specifically did he say that made you uneasy  
9 about him?

10 A Just the way that he describes -- described Anna  
11 like she was kind of worthless human being, calling her  
12 a -- excuse my language, but a "fucking cunt. She's  
13 trash." You know, just things that a man does not call a  
14 woman. And I immediately just felt very taken back  
15 because normal people don't talk like that. And -- and  
16 he -- it would -- it almost came very simple to him  
17 without even really knowing me at all, so.

18 Q And -- and given your discomfort with Mr.  
19 Braddock, why did you call him back that night when he  
20 asked you to call him?

21 A He had warned me in that original voice text  
22 that he's in -- it -- he's in kind of deep, or he's got  
23 something to tell me. I knew it was about Anna, that I  
24 can't say anything. Just very bizarre. And just having  
25 the conversations with him in the past, it made me very

1 concerned. And I called him back because I had that gut  
2 feeling that something was really wrong.

3 Q And so would you describe your contacts from Mr.  
4 Braddock as -- as -- as welcomed? Something that you  
5 sought out, or -- or wanted to have happen?

6 A No. I had no intention at all of -- of working  
7 with him. Actually, my intention was to completely avoid  
8 him. But when he's sending messages such as this, it put  
9 up a red flag to me, and I felt that I needed to know  
10 more.

11 Q So your reason for calling him that night arose  
12 out of your concern about whether Mr. Braddock posed a  
13 threat to the safety of yourself and others?

14 A Yes, 100 percent.

15 Q Okay. And you already discussed the threats Mr.  
16 Braddock made against you and your children on the call.  
17 I -- I'm going to focus on how did Mr. Braddock's threats  
18 on that call make you feel? Did you -- did you feel  
19 genuine fear for your own safety?

20 A Yeah, 100 percent. I -- I know I -- I've lived  
21 through a lot. I was in war, you know? And I think that  
22 this actually shook me more than any RPG or any -- you  
23 know, any -- anything that threatened my life. This was  
24 more because it -- it was -- it felt so personal.

25 And I've never spoken with anybody where it came so



1 easy for him to say something like this, that a life was  
2 completely, you know, in his words, "for the greater good  
3 of the country, we have to, you know, some people we'll  
4 have to sacrifice."

5       And he literally said that I was one of those people,  
6 and so was Anna, on the call. So that -- since that, I --  
7 it -- this ongoing case has turned my life upside down.  
8 And especially my children's lives upside down. I sent  
9 them out of state. For the majority of the summer I  
10 didn't even see them, because I didn't know what he was  
11 going to do them or me.

12       Where's the retaliation? And he stated in his prior  
13 phone calls that it -- it wouldn't even be him. He would  
14 just call somebody else to do it, you know, and it's --  
15 it's scary. Because I don't know who this guy is. And I  
16 don't know what he's capable of. And I don't know what  
17 he's done in the past.

18       He's claimed that he's lived all over the world. Is  
19 he getting away with this all over? Because he said to me  
20 that he would leave the country to -- to evade prosecution  
21 if any -- if he -- you know, he was trapped down for  
22 something like this. Like, it's -- it's terrifying.

23       Q       Absolutely. And were you aware when you were  
24 speaking with Mr. Braddock that he has a military history?

25       A       Yes.

1 Q And given your own military history, did you  
2 have concerns about what type of training that he might've  
3 had?

4 A Yeah, absolutely. I mean, they're --  
5 especially, you know, Marines. They're trained to kill.  
6 That's -- you know, and he is talking about killing. And  
7 he knows what he's doing. And that makes it that much  
8 more scary.

9 Q You -- you -- you talked a little bit about the  
10 steps you took to ensure your -- your children's safety,  
11 including sending them out of state for a lot of the  
12 summer. Did you also have to take significant steps to  
13 secure your own safety after these events?

14 A Yeah. I stopped speaking at events. I stopped  
15 going places. I got extra security in my house. I -- I  
16 just literally put my life on hold. I don't -- I don't  
17 know what else -- it's scary, you know? I'm just -- I'm a  
18 single mom.

19 And it's a really hard position to be in right now.  
20 Not -- with not knowing if one day I'm going to be at the  
21 grocery store and, like, somebody just -- like, I don't  
22 know.

23 Q Okay. So we talked about the call in which Mr.  
24 Braddock made these threats against you and your children.  
25 Let's talk now about this separate voice text. This --

1 this -- this -- this was another voice text that took  
2 place after that initial call, is that correct?

3 A Yes.

4 Q Did you feel like it was a separate event in  
5 time?

6 A Yes.

7 Q Do -- do you have a sense of how far a part in  
8 time the call was and the later voice text?

9 A I was off the phone and on the phone with Anna.  
10 So it was 15 minutes, half hour later that he -- he sent  
11 that. Essentially, making sure -- guaranteeing that I  
12 didn't say anything, or else.

13 Q And what was your reaction to that voice text?  
14 Did that voice text also place you in fear?

15 A Yeah, because, you know, maybe he -- he had time  
16 to think about it. He had that time to think about it.  
17 And -- and he knew enough what he was doing to resend  
18 another message, threatening me once again with my life if  
19 I told anybody.

20 Q Did that make you feel like his initial  
21 communications weren't just impulsive, but something that  
22 he had had an opportunity to again think through?

23 A Yes. Yes, with a plan. I --

24 Q Did you believe that Mr. Braddock's threats that  
25 he made to you on the call and on the voice text were

1 credible?

2 A 100 percent, yes.

3 Q Did you feel like the threats that Mr. Braddock  
4 made to you and your children on the call and on the  
5 separate voice texts were threats that he had the means to  
6 carry out?

7 A Yes.

8 Q Did you believe Mr. Braddock when he said he  
9 could harm Ms. Luna and you and your children?

10 A Yes.

11 MS. JANES: Thank you, Your Honor. That's --  
12 that's -- that concludes my direct examination of Ms.  
13 Olszewski.

14 THE COURT: Okay. All right. I have some  
15 questions. I don't know if Mr. Hayslett wants to  
16 start with his questions, I will defer.

17 MR. HAYSLETT: Maybe I'll cover them, Judge.

18 THE COURT: All right. Hold on a second. Let  
19 me just let -- let me just talk to Ms. Olszewski for  
20 a second.

21 MR. HAYSLETT: Sure.

22 THE COURT: So Ms. -- Ms. Olszewski, I haven't  
23 had to interrupt any of the questioning as of right  
24 now, to discuss your 5th Amendment right to remain  
25 silent.

1           Let's see. I need to tell you that everything  
2           you say in this courtroom is under oath and is being  
3           recorded. It can be transcribed and it could be used  
4           for other purposes, whether it be any further civil  
5           suits, criminal investigation, anything like that.

6           Only you have the ability to exercise your 5th  
7           Amendment right. If at any time during the  
8           questioning you wish to exercise this 5th Amendment  
9           right, just let me know and I will respect that. But  
10          it is your right and yours alone. And if you wish to  
11          assert it at any time, you can do that at any time  
12          during the questioning. Do you understand that?

13                THE WITNESS: Yes, Your Honor.

14                THE COURT: Okay. All right. Mr. Hayslett, do  
15          you want to inquire?

16                MR. HAYSLETT: Sure.

17                                    CROSS-EXAMINATION

18 BY MR. HAYSLETT:

19           Q     Ms. Olszewski, could you kind of give us an idea  
20          of your first contact with Mr. Braddock, when did that  
21          occur?

22           A     It was at an event that I was speaking at.

23           Q     And this was the healthcare issue?

24           A     I was speaking at Karol Hotel in Clearwater as a  
25          guest speaker. And that's where Mr. Braddock -- that's



1 where I first came in contact with Mr. Braddock.

2 Q And at that point -- is -- is this a point that  
3 you're alleging that you were threatened?

4 A Can I --

5 THE WITNESS: Your Honor, can I ask a question?  
6 Is there any way that I am able to -- to see Mr.  
7 Hayslett?

8 THE COURT: Oh, yeah.

9 MR. HAYSLETT: I'm sorry. I'll move around.  
10 Tell me -- tell me --

11 THE COURT: Oh. Hold on a second.

12 MR. HAYSLETT: -- where would be good.

13 THE COURT: Let me make sure that my video shows  
14 Mr. Hayslett. All right, there you go.

15 THE WITNESS: Thank you, Your Honor.

16 Q (By Mr. Hayslett) Ms. Olszewski, at The Karol  
17 Hotel, are you alleging that he threatened you there?

18 A No.

19 Q Did he harass you there?

20 A No.

21 Q Are you claiming that -- that -- that he stalked  
22 you there?

23 A Possibly.

24 Q Okay. Let's talk of the "possibly" stalking  
25 you. You mean that he -- he may have been stalking you

1 and you didn't know it?

2 A The only reason I say that, Mr. Hayslett, is  
3 because he had been contacting multiple people. And I  
4 found this out later from my contact information.

5 Q To get in contact with you?

6 A To get in contact with me.

7 Q Were you aware -- let -- let me back up for  
8 this. Were you aware that he was thinking about running  
9 or running for the congressional seat for Florida 13th?

10 A The first time that I heard of this is at the  
11 end of my -- my speaking event, I always ask if anybody  
12 has any questions for me. Instead of a question, Mr.  
13 Braddock got up and discussed his possible run for a --  
14 you know, to get into politics. I don't exactly remember  
15 when or where, but at that point, I mean, I just knew that  
16 he was interested in politics.

17 Q At that point, did you know Ms. Luna at that  
18 point?

19 A Yes.

20 Q And how did you know her?

21 A Through mutual friends.

22 Q Did you have her cell number?

23 A I do.

24 Q Okay. So at the first Karol Hotel, no  
25 harassment, no threats, the possible stalking is that he

1 asked a question of you?

2 A I say that it was -- he was possibly tracking me  
3 down. Because I had found after this that he had been  
4 contacting multiple friends of mine trying to get my  
5 information.

6 Q Did he -- when tracking you down, do you think  
7 for nefarious reasons because he wanted to do you harm?

8 A I don't know.

9 Q Did he ask you to speak on his behalf, or  
10 provide information for your healthcare for him?

11 A I'm sorry, can you repeat that? It's hard to --

12 Q Did he ask --

13 A -- hear.

14 Q -- did he ask you to be a part of his team and  
15 be involved in candidacy?

16 A Not at The Karol Hotel, no.

17 Q But -- but ultimately he did, correct?

18 A Yes.

19 Q So this intended stalking was he was stalking  
20 you because he thought you were an expert in your field,  
21 and he wanted you to help him and his candidacy for  
22 congress?

23 MR. PERLMAN: Objection. Leading, Judge.

24 MR. HAYSLETT: This is cross-examination.

25 THE COURT: Overruled on that grounds.





1 Q (By Mr. Hayslett) Ms. Olszewski, so let me see  
2 if --

3 MS. JANES: Your Honor, he's asking the Witness  
4 to -- to -- to speculate about what Mr. Braddock  
5 wanted.

6 THE COURT: Sustained. I'll sustain that  
7 objection.

8 MR. HAYSLETT: Certainly. Ms. --

9 THE COURT: -- objection --

10 MR. HAYSLETT: -- Olszewski.

11 THE COURT: -- (unintelligible).

12 MR. HAYSLETT: I understand.

13 Q (By Mr. Hayslett) Ms. Olszewski, ultimately,  
14 did he approach you and ask you to assist him with your  
15 expertise and his run for congress?

16 A At The Karol Hotel, or --

17 Q At any -- at any --

18 A -- when --

19 Q -- point. At any point.

20 A He had contacted a friend of mine after that,  
21 requested my number, and he -- then we -- that's when he  
22 asked me if I would be interested in being in a healthcare  
23 panel summit.

24 Q Okay. So that's what I'm trying to get to. So  
25 The Karol Hotel, he's trying to get in contact with you.

1 This reason he's trying to get in contact with you is to  
2 ask you, because he believes you to be an expert to sit on  
3 a healthcare panel. Is that right?

4 A I would just -- I would assume --

5 MS. JANES: Your Honor, I -- and Ms. Olszewski,  
6 I'm sorry. Just -- if you could pause for a second.  
7 I think Mr. Hayslett is again asking Ms. Olszewski to  
8 speculate regarding what Mr. Braddock's motives were.

9 MR. HAYSLETT: I want to know if he asked her.  
10 I don't care as what he thought. I wanted to know if  
11 he asked her to be on it.

12 THE COURT: Well, you asked her in your question  
13 if the reason he was contacting her --

14 MR. HAYSLETT: I understand. Okay.

15 THE COURT: -- was that. So I'll --

16 MR. HAYSLETT: Got you.

17 THE COURT: -- allow you to rephrase --

18 MR. HAYSLETT: Got you.

19 THE COURT: -- because that was a --

20 Q (By Mr. Hayslett) Ms. Olszewski, --

21 THE COURT: -- speculative question.

22 Q (By Mr. Hayslett) -- ultimately, did -- did you  
23 get the information directly or indirectly that he wanted  
24 you to sit on a board -- a panel?

25 A Indirectly.

1 Q Okay. Oh --

2 A Well, he contacted a friend of mine. He said  
3 that's why he wanted to contact me. And I said, okay,  
4 I'll hear him out. You know, it's not uncommon for me to  
5 do this -- these kind of events.

6 Q So --

7 A At that time, I had never spoken to him in  
8 person, minus me standing up as a speaker in a -- in a  
9 large group, and -- and picking his name. And I did not  
10 speak with him after, nor did he approach me after asking  
11 for contact information for a health summit.

12 Q Got you. So The Karol Hotel; are you alleging  
13 any other incident or stalking other than he asked you a  
14 question and he appeared there?

15 A I am -- I -- I -- I think I stated that he was  
16 calling and contacting multiple of my friends attempting  
17 to get my contact information --

18 Q I want to talk about The Karol Ho --

19 A Other than that, no.

20 Q -- The Karol Hotel, then that. The Karol Hotel,  
21 first. Anything else at The Karol Hotel that you're  
22 alleging to this Judge that you believed he was stalking  
23 you, harassing you, or threatening you at that point?

24 A No.

25 Q Second, now we're going to talk about the

1 indirect contact of asking for your contact number or info  
2 to sit on this healthcare panel. Other than contacting  
3 you through your friends or associates to ask you directly  
4 or indirectly to sell -- sit on a healthcare -- healthcare  
5 panel, did he threaten you during that time period? Did  
6 he ask your associates that you were threatened? Was he  
7 harassing you?

8 A I -- can you, like -- is -- are you talking  
9 about our first phone call? Or are you talking about just  
10 indirect through my friends, is he harassing me?

11 Q You -- you said that your friends told you that  
12 he contacted them to get you to sit on a healthcare panel.  
13 Are you alleging that he was threatening you at that  
14 point?

15 A No.

16 Q Okay. Do other people ask you to sit on panels?

17 A Yes, it's not uncommon.

18 Q Okay. So him asking indirectly, that was not  
19 something unusual for you?

20 A It -- I think I -- I'm going to disagree with  
21 that. I think it is unusual for somebody to be turned  
22 down multiple times and be persistent. And that's what  
23 happened.

24 Q Okay. I - I wasn't aware of that. So you  
25 actually turned him down multiple times?

1           A     Friends of mine did because they felt a little  
2 bit off on him. And they didn't want to put me in a bad  
3 situation.

4           Q     Okay. So they turned you down for him. I mean,  
5 did they ask you the question, or did they turn him down  
6 without even getting to you?

7           A     They felt uncomfortable putting me in contact  
8 with him.

9           Q     Okay.

10          A     Because of just his demeanor. And I -- you  
11 know, I -- I was made aware of this after the fact. But  
12 ultimately he got through, you know, and I said well, I am  
13 a -- I talk to a lot of people, you know, and maybe  
14 there -- maybe he's weird, but maybe he's -- maybe he's  
15 got something that's -- that's good. And I'm -- I'm  
16 willing to hear it, so.

17          Q     Okay --

18          A     That's --

19          Q     -- so he finally got through. So I'm going to  
20 get to the point, The Karol Hotel, the indirect contacts,  
21 the turning him down, up until the first time that you  
22 actually speak to him on the phone. Because the first  
23 time you speak to him, it was on the phone, correct?

24          A     Yes.

25          Q     Okay. Up until that first phone call, had he

1 threatened you?

2 A I hadn't heard from him until the first phone  
3 call, no.

4 Q Had he harassed you through another third  
5 person?

6 A A third person?

7 Q Yes, ma'am.

8 A No, like, direct threats through -- or indirect  
9 threats through a third person that he's going to kill me?

10 Q Any -- any threats.

11 A No.

12 Q Okay. Let's get down -- now we're to the first  
13 phone call. Do you know when the first phone call is?

14 A It was sometime after that event. I -- I can't  
15 think of the exact date right now.

16 Q What were the context of that of that phone  
17 call?

18 A It was about the summit. And then it slowly  
19 navigated into his hatred for Anna. And it -- it -- it  
20 went on for quite some time about how she needs to go, how  
21 she's such a horrible person, she's a danger to society,  
22 how he's the best person for it.

23 And -- at this point in time, he had no clue that,  
24 you know, I even knew Anna. He -- he really didn't know  
25 who I knew. So that's why I -- I felt immediately the

1 very first phone call that something was off about Mr.  
2 Braddock.

3 Q So as you --

4 A Normal people don't talk like that.

5 Q So as you said, he had no idea that you knew  
6 her. So he would have no expectation that anything he  
7 said to you would ever get back to her? Because he didn't  
8 even know that you knew her, correct?

9 A Correct.

10 Q Okay. So I think he felt safe in having an open  
11 conversation with you about his feelings of her, whether  
12 it's, you know, as he said, he felt he's the right person  
13 for the job. The job being the Congressman from the 13th  
14 Circ -- the 13th --

15 MS. JANES: Your Honor, I'm not sure if this is  
16 a question. If it is, it's speculative. But it --  
17 it actually seems more like argument.

18 THE COURT: Okay. I think it was little  
19 argumentative --

20 MR. HAYSLETT: I'll --

21 THE COURT: -- and possibly --

22 MR. HAYSLETT: -- I'll -- I'll ask --

23 THE COURT: -- possibly --

24 MR. HAYSLETT: -- ask another question.

25 THE COURT: -- somewhat compound. So maybe we

1           can break it down a little.

2           Q       (By Mr. Hayslett) So -- so Ms. Olszewski, going  
3 back as it's so clearly, as you stated, he had no idea  
4 that you knew her, as you said. And did he -- then his  
5 conversation with you, there was no expectation that you  
6 were going to tell Ms. Luna about anything he said. Is  
7 that right?

8           A       Correct. And that's why this is not political  
9 for me. Because normal people don't talk horrible things  
10 about other people like that. And that was why I had a  
11 red flag from the very, very, very beginning.

12          Q       Okay. So let's talk about this. You're on the  
13 call, you have the red flag at that point -- is that --  
14 when you talk about the "red flag" at the very, very  
15 beginning, is this the "very, very beginning" right now?

16          A       Not, necessarily. The first red flag was at The  
17 Karol Hotel. It's very bizarre when I ask -- when I have  
18 a question and answer, people -- people ask me questions.  
19 It's -- it's my stage, you know, I'm there to speak to the  
20 people.

21                So my first red flag with him was just very bizarre  
22 that instead of a question, he got up and essentially  
23 became -- made himself a speaker in front of the room. So  
24 I would say that that is my first red flag. And that  
25 phone call was my second red flag.



1 Q Well, Ms. Olszewski, if you had this red flag,  
2 and you were concerned about his behavior, thought he was  
3 odd, if you thought he was threatening, if you thought he  
4 was harassing, why would you accept a phone call from him  
5 on this first phone call after your friends, you allege,  
6 had turned him down? And you said you want to hear him  
7 out. If you were so afraid, and so threatened, why did  
8 you engage with him on phone call number 1?

9 A Can you re -- I'm sorry. Can you repeat -- can  
10 you repeat that for me? I'm --

11 Q You indicated to the Court that the --

12 A Um-hum.

13 Q -- red flag occurred at The Karol Hotel. You  
14 told us that her -- your friends had directly had turned  
15 him down to be on the healthcare board. Yet, you told us  
16 with now one red flag, you engage with him on a phone  
17 call, with your second red flag, knowing that you thought  
18 he was odd. You thought he was threatening. You thought  
19 he was harassing. Yet --

20 A Hm.

21 Q -- you voluntarily accepted that phone call and  
22 spoke with him about Ms. Luna, which he had no indication  
23 that you knew. So why did you have that phone call? And  
24 why did you continue to talk with him?

25 A The first red flag, I just thought he was odd.

1 Like, I don't mind speaking to odd people. Like, there's  
2 a lot of odd people. The -- the second red flag on the  
3 phone call is when I realized that it was more than just  
4 being odd. It was being extremely -- I'm trying to think  
5 of the -- the description -- very harassing in nature. He  
6 was very angry.

7 Q Could you ex --

8 A He was -- I -- I -- I don't -- he reminds --  
9 like, I'm a -- I, and I don't even -- I -- I don't want to  
10 talk about this, but like, I am a domestic abuse survivor.  
11 I've been put in the hospital. I've almost been killed.  
12 I've been to the women's shelters.

13 I recognized his behavior as somebody like that, as  
14 an abuser, as a very scary man. And that is why I have  
15 that red flag on that phone call. And that is why I kept  
16 him at a distance.

17 Q So the -- the way you kept him at a distance is  
18 you continued to have a conversation with him?

19 A We had a total of two, three conversations  
20 altogether. You have to remember this isn't just months  
21 and months and months of -- this is over a few -- a matter  
22 of weeks --

23 Q I -- I'm just trying --

24 A -- in a matter of a couple of phone calls. So I  
25 didn't continue to -- to have phone calls with him.

1 Q So we're -- we're still on phone call number 1  
2 where you say he's a "scary man." You say versus your  
3 position as a domestic violence survivor, that you could  
4 pick these things up. You felt --

5 A Not only that, but I'm also a registered nurse.  
6 And I'm trained to -- to -- to assess these types of  
7 behaviors.

8 Q You got all that experience. You think he's a  
9 "scary man." You said it was very harassing against you.  
10 Can you tell the Court, call number 1 -- we're still on  
11 call number 1, how he was harassing you. Specifically,  
12 how he was harassing you on call number 1?

13 A I didn't claim that he was harassing me on call  
14 number 1. I claimed that he was harassing Anna on call  
15 number 1 to me.

16 Q Okay. So let's talk about you, then I'll talk  
17 about Anna. On call number 1, no harassment against you,  
18 no threats against you, no stalking against you. Is that  
19 right?

20 A No.

21 Q Okay. Let's talk about those threats against  
22 Anna on call number 1.

23 A What?

24 Q Did he threaten Anna on call number 1?

25 A Indirectly, yes.

1 Q Okay. Specifically, what did he say to threaten  
2 Anna on call number 1?

3 A She's a cunt. She's -- needs to be removed.  
4 She's a danger to society. She is worthless. She's a  
5 liar.

6 Q Anything else?

7 A I'm just going to take a little bit more time  
8 to -- to think because he said quite a few things, and  
9 just a lot of hostility towards her.

10 Q Okay. So (unintelligible)--

11 A That --

12 Q -- the threat you said that -- and I want to --

13 A -- is --

14 Q Go -- go ahead. I'm sorry.

15 A He had a lot of hos -- hostility towards her.  
16 And it was very obvious to me that he felt very firmly  
17 that she doesn't belong --

18 Q Was -- was it --

19 A -- running for --

20 Q -- was it --

21 A -- any type of political office.

22 Q Was it clear --

23 A And she doesn't even --

24 Q I'm sorry.

25 A -- belong in Pinellas County.

1 Q Was it clear to you that he thought she was a  
2 poor candidate for congress?

3 A She was a cunt.

4 Q I understand that.

5 A That's what he told --

6 Q Was it clear to you that he thought she was not  
7 qualified to be a congresswoman?

8 A That was very clear.

9 Q Okay. Did you know at --

10 A And he's a --

11 Q -- that point that he was running for office?

12 A I had no clue. I mean, he discussed running. I  
13 didn't know that he was going to run for the same seat.

14 Q Okay. So he told you he had little aspirations.  
15 He told you he didn't like her, thought she'd do a poor  
16 job as a congresswoman. Is that right?

17 A Yes.

18 Q And you said at that point -- and -- and I think  
19 the threat was that he wanted to remove her. That's what  
20 you just said. Is that right?

21 A Yes.

22 Q Okay. Remove her from office? Remove her from  
23 the campaign? Remove her from the earth? Was he  
24 specific?

25 A Nope. No.

1 Q What did you take that as? Did he want her  
2 removed from the campaign, not be a candidate?

3 A Well, now I know that he wanted to remove her --  
4 her life. So it makes sense, why he was --

5 Q Okay.

6 A -- saying that.

7 Q That's what you interpreted now. That's what  
8 you thought he was saying?

9 A I actually interpreted it as a really great  
10 threat at that time as well.

11 Q Okay.

12 A You know, without him saying it word for word.  
13 The way that he was saying it -- the tone he was saying  
14 it, the words that he was using, the language, was all  
15 indicative of more than just beating somebody in a  
16 political, you know, run for -- for congress. And it --  
17 it felt more --

18 Q And you took it serious --

19 A -- sinister.

20 Q -- correct?

21 A It felt more sinister to me.

22 Q And you took it serious, correct?

23 A Yes.

24 Q Okay. Did you contact the sheriff's office,  
25 or -- or was it St. Pete PD? Which office -- police

1 department did you contact after call number 1?

2 A There was no direct threats to her life at that  
3 point. He was just very, very angry on that phone call --  
4 the first phone call.

5 Q You're confusing --

6 A So I -- I -- I did let Anna know that I spoke  
7 with him. And I let her know, you know, he's saying some  
8 things that are really very bizarre. And things that  
9 normal people don't say, regardless of how much you may  
10 not like somebody --

11 Q So --

12 A -- it's just very unprofessional.

13 Q And -- and I understand. And that's not up for  
14 debate. But -- Ms. Olszewski, on the issue -- so there  
15 was no direct threat on call number 1? You're confusing  
16 me here. First, you said he -- he threatened to remove  
17 her. Now, you're saying there's no direct threat. Which  
18 was it? Was there a direct threat, or not direct threat?

19 A I guess if we interpret it --

20 MS. JANES: Your Honor. Your Honor, this  
21 getting badgering and harassing.

22 THE COURT: I'll overrule that objection. I --  
23 I don't think so. I think he's just trying to  
24 clarify. At -- my questions are going to be trying  
25 to hammer down the timeline and exactly what

1           happened.  And --

2           MR. HAYSLETT:  I'm -- I'm --

3           THE COURT:  -- so because I don't think it's  
4           very clear --

5           MR. HAYSLETT:  No.

6           THE COURT:  -- as to when even the forum was, or  
7           how close into the forum was the other contact in  
8           call number 1, and all those kinds of things.  So I  
9           think that's -- I'll overrule that objection.  But do  
10          anticipate that I'm going to have some questions  
11          about the timing of all these events.

12          MR. HAYSLETT:  Sure.

13          Q        (By Mr. Hayslett)  Ms.-- Ms. Olszewski, along  
14          the Court's -- and do you know when The Karol Hotel, when  
15          that occurred?

16          A        It was, at the end of May -- May 27th.  I'm --  
17          I'm --

18          Q        Okay.

19          A        -- around -- approximately.

20          Q        You -- you said that -- okay, Karol Hotel is May  
21          27th.  You indicated that Mr. Braddock was contacting your  
22          friends, or advisors, or cohorts, and that they had been  
23          turning him down.  What's the time period of him being  
24          turned down prior to phone call number 1?

25          A        Within a week.  It was about --



1 Q A week after this?

2 A -- a week in --

3 THE COURT: Well, Mr. Hayslett, your question  
4 was in -- within relation to call number 1, so.

5 MR. HAYSLETT: Yeah, I want to know The Karol  
6 Hotel, sorry.

7 Q (By Mr. Hayslett) And with -- with regard to  
8 Karol Hotel, how -- when were -- when was he getting  
9 turned down from your friends in relation to -- to The  
10 Karol Hotel?

11 A Right around that time. I mean, I -- I'm not  
12 exactly sure. He had contacted Audra, who was another  
13 witness in this case, multiple times trying to get ahold  
14 of me.

15 And what's interesting is prior to him reaching out  
16 to Audra --

17 Q Well, Ms. - Ms. Olszewski --

18 A -- he had told her that --

19 Q -- let's -- let's --

20 A -- he doesn't want anybody within the medical  
21 freedom movement involved; he doesn't like these people.  
22 And I am probably one of the biggest people and -- and  
23 nurses. And so it didn't make sense, either, for why he  
24 would want to -- to contact me so bad.

25 Q Let -- let -- let me go back to this from a

1 timeframe. The contact your friends have are about week  
2 after The Karol Hotel. When -- when was the phone call  
3 where you believe he was a "scary man" and was threatening,  
4 or may or may not threatened somebody -- when was that  
5 first call that we're still talking about? When was that  
6 call? What was the date of that -- or in reference to  
7 either him being turned down at The Karol Hotel?

8 A It was approximately a week later. I -- I don't  
9 know the date. I know that there -- there is evidence  
10 submitted to this. I -- I would have to ask my attorney.

11 Q But do you have a recollection of when that was?

12 A It was -- it was approximately a week after The  
13 Karol Hotel.

14 Q So a week after The Karol Hotel, the in between  
15 he's being turned down, you get this phone call from him.  
16 And -- and what I haven't gotten an answer to, and I'm  
17 trying to understand is, are you claiming -- I think you  
18 told us that you had no direct -- or direct threat,  
19 harassment, or by Mr. Braddock in that call. But the  
20 threat was against Ms. Luna. Is that correct?

21 A Correct.

22 Q And -- and you believe that the direct threat  
23 was that he wanted her removed?

24 A Yes.

25 Q Was there any other direct threat, harassment,

1 or stalking through you from Mr. -- well, that couldn't be  
2 stalking because he didn't know you knew each other. But  
3 was there any other threat, other than that he wanted her  
4 removed, from that phone call?

5 A Are you asking if he told me how he wanted to  
6 remove her? I'm just trying to --

7 Q Well, if -- if -- if he told you in that phone  
8 call how he was going to remove her, I'd like to hear  
9 that, too. Yes, please.

10 A No, he -- he didn't say how he was going --  
11 going to do it in that phone call.

12 Q And -- and you interpreted not that he wanted to  
13 remove from the candidacy --

14 A Right.

15 Q -- meaning that she would be not a candidate.  
16 But you took it that he was making a threat against her  
17 life?

18 A I took it that he was extremely harassing in  
19 nature, very angry. I do look at it as very dangerous  
20 language.

21 Q Understand. I understand you got all these  
22 skillsets, and you can recognize better than most people.  
23 Which law enforcement agency, after call number 1, did you  
24 contact?

25 A I didn't contact any law enforcement agency at

1 that time. But I did contact Anna to give her a heads-up  
2 that, you know, he has some pretty heavy words and  
3 language that I find extremely unnerving.

4 Q I understand. But you -- you thought that he  
5 was threatening her life, right?

6 MS. JANES: Your Honor, I'm going to again  
7 object to the badgering. At this -- this point, it's  
8 getting pretty repeated.

9 THE COURT: Okay. I -- I will sustain the legal  
10 objection of asked and answered.

11 Q (By Mr. Hayslett) Ms. Olszewski, so at this  
12 point, you contacted no law enforcement. You contacted no  
13 other folks about this alleged direct threat other than  
14 Ms. Luna?

15 A I only --

16 MS. JANES: Your Honor, again -- again asked and  
17 answered. Because he's just asking the same question  
18 again.

19 MR. HAYSLETT: I didn't ask -- I asked - I asked  
20 if she -- anybody other than Ms. Luna that you talked  
21 to.

22 THE COURT: I think she said no. I don't she's  
23 clarified that. I think she's testified that she  
24 contacted Ms. Luna.

25 MR. HAYSLETT: Correct.

1 THE COURT: She's con -- testified that she  
2 didn't contact any law enforcement agency --

3 MR. HAYSLETT: Right.

4 THE COURT: -- but I'm not sure that she's been  
5 asked if there --

6 MR. HAYSLETT: She hasn't.

7 THE COURT: -- was any additional person. So I  
8 will overrule that objection.

9 Q (By Mr. Hayslett) Ms. Olszewski, with this  
10 impending direct threat that you were so concerned about  
11 with your expertise, did you contact anybody other than  
12 Ms. Luna to warn other folks about Mr. Braddock and your  
13 concern?

14 A Yeah. I actually contacted Audra who gave me  
15 his number. And I said, you know, he's -- and I -- and I  
16 told her about his as well. So I did contact Audra.

17 Q To tell Ms. Audra what?

18 A Exactly what I told Anna, that you know, all of  
19 the very strange bizarre things that he was saying.

20 Q Did you instruct Ms. Luna to contact law  
21 enforcement?

22 A No. I told her that, you know, to be careful  
23 around him. Because I -- I didn't trust him at that  
24 moment.

25 Q Did you tell Audra to contact law enforcement on

1 Ms. Luna's behalf?

2 A No. I also told her the same thing, to -- to be  
3 very careful around him and -- and keep a watchful eye.

4 Q Okay. Because you were concerned for -- at that  
5 point -- for Ms. Luna's life?

6 A I didn't know. I didn't know. I -- I -- I  
7 was -- I was just making sure that they knew that there  
8 was something off about this man, William Braddock.

9 Q So this is call number 1. Did you have a second  
10 call with him?

11 A I don't think so. I think that it was mainly --  
12 I asked him -- I text messaged asking him to send me the  
13 summit -- the health care summit. Because I actually  
14 was -- I wanted to know who was on it and who else he was  
15 affiliated with.

16 Q I'm confused here. After--

17 A Because I -- I -- norm -- I normally do that  
18 with every -- every event because I want to know who I'm  
19 associating myself with.

20 Q So after this call where he threatened Luna --  
21 Ms. Luna -- that after this call where he felt he was a  
22 "scary man." After this call, then you text him for him  
23 to send him information about the healthcare summit?

24 A He sent -- he texted me multiple times that he's  
25 going to send emails. And you know, he was keeping me

1 updated that it was taking a little bit longer. I believe  
2 he invited me to go to an event that I did not go to.

3 And then I had text him back asking if he had sent  
4 that email. Because I wanted to know who else he was  
5 affiliated with. Because really, I've never seen him  
6 before. I have no idea where he came from.

7 And you know, the group of people -- and you know,  
8 this type of -- I guess the freedom -- like, a healthcare  
9 summit or anything like that, I -- I know pretty much  
10 everybody in -- in the area. So I wanted to know, kind  
11 of, who he is. Who -- who is this guy? And who's he  
12 associated with?

13 Q Could you give us a timeframe of after the call  
14 where you said you were afraid for Ms. Luna, after you  
15 warned Ms. Luna, after you'd called Audra? How soon after  
16 that scary call did you text him?

17 A He texted me. I think I responded to him.

18 Q How soon --

19 A I -- I (unintelligible) --

20 Q -- after that call did you respond to him?

21 A Can -- I didn't hear you. Can you repeat that,  
22 please?

23 Q How soon after this call did you respond and  
24 interact with him?

25 A A couple days, I think.

1 Q Here's the question --

2 A It was just -- with -- all of this happened  
3 within a two, three-week period. So I mean, it -- it --  
4 it wasn't a very long drawn out --

5 Q Ms. -- Ms. Olszewski, I guess this is my  
6 question, if you're so concerned about him, if you're so  
7 afraid for Ms. Luna -- if you thought he was going to kill  
8 Ms. Luna like you allege, why would you engage and text  
9 him back and ask him questions about a healthcare summit?

10 A Because I wanted to know who he was associated  
11 with. And I think I -- I've already answered that, sir.

12 Q You wanted to know who he was associated with?

13 A Yes.

14 Q For what purpose?

15 A Because I didn't know who he was at all. I -- I  
16 have never seen him before. And the type of behavior was  
17 extremely bizarre; it was scary; it was harassing, and you  
18 know, if he's going to talk like that about Anna, who's to  
19 say that he's not going to do that to me, too?

20 Q And --

21 A Or who's to say that he's not going to talk  
22 about this to any other woman?

23 Q I understand. In your text with him back and  
24 forth, are you alleging that he threatened or harassed you  
25 during these texts?



1           A       The text messages were simply about sending  
2 emails, that he was running late on the email. And I  
3 think it was something about an event that he was having  
4 that I did not go to.

5           Q       Are you alleging that he was stalking you by  
6 sending these texts that you responded to?

7           A       I don't know. I -- I -- I don't -- they weren't  
8 harassing. But I don't know why he would -- I -- I -- I  
9 don't -- I don't -- I don't know what his intentions were,  
10 to be honest with you.

11          Q       It looks like he wanted you to sit on a  
12 healthcare summit.

13          A       It was just weird to me that he wanted me on a  
14 healthcare summit after saying to Audra that he wants  
15 nothing to do with people like me. So --

16          Q       Okay.

17          A       -- for him to -- to continuously try to contact  
18 me over and over and over again, to sit at a healthcare  
19 summit where he specifically said he didn't want people  
20 like me, it just kind of -- it rubbed me the wrong way.  
21 And then, you know, hearing him on the phone call and just  
22 his demeanor, it -- it was one of those situations that  
23 you kind of want to stay away from.

24                 But at the same time, I needed to know who this guy  
25 was. And it -- and you can't just ignore something like

1 that.

2 Q Sure.

3 A I needed to, you know, protect myself, too.

4 Q So to protect yourself, you continued to engage  
5 with him. And to protect yourself, you never tell him to  
6 stop calling you or texting?

7 A I asked him for the emails. That was pretty  
8 much the extent of -- of my interactions with him. Which,  
9 ul -- ultimately, he did send me an email that didn't  
10 include anybody on the summit except for Audra who was my  
11 friend. So I feel like that may, you know, have been a  
12 lie. Because I never did see the health care summit that  
13 he promised.

14 Q Are you alleging in the email he sent you that  
15 he harassed you or threatened you?

16 A No.

17 Q Are you alleging in any email after this call  
18 that he threatened Ms. Luna?

19 A Did the email threaten Ms. Luna?

20 Q Yes, ma'am.

21 A Is that the question?

22 Q Yes, ma'am.

23 A No.

24 Q At any point, now that we have The Karol Hotel,  
25 the contact to your friends, the phone call when you

1 thought he was scary and dangerous, the texts where you've  
2 gone back and forth, and an email. At any point at  
3 that -- at that time, did you contact him and say, "don't  
4 contact me. I don't want anything to do with you. I'm  
5 afraid of you. Stop harassing me"?

6 A I think that would provoke him, to be honest.  
7 And that's why I -- I didn't. I mean, I --I didn't want  
8 him --

9 Q You -- you thought telling him to not contact  
10 you would -- okay.

11 A I didn't -- I didn't want him to retaliate on me  
12 the way that he was speaking on -- on Anna to me. I  
13 didn't want to upset him, to be honest with you. And  
14 that's exactly why I didn't attend the event that he had.  
15 And that's exactly why our only messages -- my only  
16 messages to him were -- were really asking about who was  
17 on the summit.

18 But to go to somebody like that, in my past  
19 experience, to tell, you know, essentially emot -- the  
20 emotionally abusing -- you know, verbally abusing, they --  
21 they -- they won't want to stop.

22 Q So because you were -- you knew this about him,  
23 that he would retaliate, you intentionally never told him  
24 to stop contacting you. And you intentionally never broke  
25 off communication because you feared, based upon your

1 training and experience, this is the type of person that  
2 would retaliate. Do I have that right?

3 A It -- it -- I -- I didn't say that he -- he  
4 would I thought I -- based on my own experience, he  
5 definitely could.

6 Q Got you.

7 A I was just keeping my distance.

8 Q You were keeping your distance. Other than the  
9 text messages that you text back and forth, the email that  
10 you requested, how else did you keep your distance from  
11 him?

12 A I didn't go to -- I didn't go anywhere.

13 Q You didn't go anywhere. Okay. Did --

14 A I didn't go to any events that he would  
15 definitely be at. I didn't go to the Community Patriots  
16 meeting, because I knew had -- he had been there in the  
17 past. So I just made -- I just chose not to -- to be  
18 anywhere that -- that he may be.

19 Q Did you ever communicate with him that you  
20 weren't showing up because you didn't want to see him or  
21 have contact with him?

22 A No.

23 Q Was he ever put on notice from you, any way,  
24 shape, or form that you didn't want contact from him?

25 MR. PERLMAN: Objection, Judge. Asked and

1 answered.

2 THE COURT: Overruled. I don't think that --  
3 that was exactly what was asked. So I'll overrule  
4 that.

5 Q (By Mr. Hayslett) Ms. Olszewski, was he at this  
6 point, after the emails, and the text message, and the  
7 phone call, and The Karol Hotel, and you were afraid of  
8 him, did you ever put him on notice not to have contact  
9 with you?

10 A No.

11 Q Okay.

12 Q So we're now here, after -- if I got this in  
13 order -- please correct me if I've got this wrong. Karol  
14 Hotel, the indirect contacts, the phone call, the text  
15 messages back and forth, and the email. What's the next  
16 time that you had contact with him?

17 A The night of the refor -- recorded phone call.

18 Q Okay. Tell us how that night started.

19 A He had sent me a -- a voice messa -- a voice  
20 text message stating that he's in really deep. He needs  
21 to tell me something. It cannot be repeated. And that  
22 was kind of where it was, and that I needed to call him.

23 Q Okay. Up to this voice text, had he directly  
24 harassed you, threatened you?

25 A No.

1 Q Okay. The voice text -- are you saying like a  
2 text where someone texts you on your phone?

3 A It wasn't in writing. And I -- and I do believe  
4 that he did that on purpose so --

5 Q I appreciate that.

6 A -- there's no screenshots.

7 Q Did you screenshot that?

8 A I -- I recorded it.

9 Q You recorded a voice --

10 A A voice text -- a voice text is a text message.  
11 But it's -- it's kind of like a voicemail. And it goes to  
12 your -- your texts. But it disappears.

13 Q Okay. So did you --

14 A So --

15 Q -- did he --

16 A -- I'm sorry. I didn't mean to interrupt you.

17 Q -- I -- I think I understand. So --

18 A Um-hum. Okay.

19 Q -- he sent voice text. You don't have a screen  
20 shot it was just -- because it was a voice text. So this  
21 next phone call, did he -- he asked you to call him? Or  
22 did you -- how did this work out? How'd you guys connect?

23 A In that voice text, he asked me to call him, and  
24 he'll explain and that I couldn't repeat it. And it  
25 was -- very scar -- it -- it was just -- it -- it was just

1 very bizarre. And -- and for me to not be able to repeat  
2 it with his -- with my prior phone conversations with him,  
3 that's what ultimately led me to call him.

4 Q Got you. So can -- can we be clear? Is this --  
5 at this point, did you believe as you said earlier, that  
6 he was a "scary man"? This is someone you said had  
7 directly threatened Ms. Luna's life. This is someone that  
8 I think you didn't really want any contact with. And you  
9 made the conscience decision to call him?

10 A Yes.

11 Q Did he threaten you and say, "if you don't call  
12 me, something bad is going to happen to you"?

13 A It seemed that way and in the -- in the voice  
14 text, absolutely. And that's absolutely why I called him.  
15 Because if he's going to tell me something, then I need to  
16 know what it is. Because I'm going to have to tell Anna.  
17 Because I -- that's -- it -- it's just what -- what  
18 another human being does.

19 Q Did you tell him at this point that you knew Ms.  
20 Luna?

21 A I mean, he knew that I knew of her, but not  
22 friends with her.

23 Q Was there any expectation from him that you were  
24 going to share this with -- Lu -- Ms. -- with Ms. Luna or  
25 keep it to yourself?

1           A     Well, he threatened to keep it to myself or I'd  
2 lose my life.

3           Q     Okay. So that -- this -- now we're on the first  
4 phone call. This is the one that gets recorded?

5           A     This is the second phone call.

6           Q     Yes, sec -- we -- yeah, second. Thank you,  
7 second phone call. And this is the one you record?

8           A     Yes.

9           Q     Could you walk us through this? I mean, you --  
10 what kind of -- do you have a -- a mechanism? How is it  
11 that when you tape a secretive phone call, how do you do  
12 that?

13          A     I don't tape secret phone calls. On this one, I  
14 felt that if he's going to tell me something that nobody  
15 else can know, I felt from our prior conversation in his  
16 harassing behavior, his very off-the-wall comments, and I  
17 was not the only one.

18                There were other people involved, which will also be  
19 testifying, you know. We were discussing him for quite  
20 some time. And knowing his background, his military  
21 background, knowing that he's trained in how to kill  
22 people.

23                And from just prior history dealing with this type of  
24 person, I didn't know -- I was actu -- I was hoping that  
25 it would be nothing. But if it was something, and



1 something happened, at least I'd be able to -- to have who  
2 did it.

3 Q I want -- you just said something: "his  
4 harassing behavior." Are you alleging prior to phone call  
5 number 2 that he was harassing you?

6 A I alle -- I -- I -- I said that he was harassing  
7 Anna. But that is still harassing behavior regardless of  
8 who it's geared towards.

9 Q And the harassing behavior you're referring to  
10 is the comments that he made about Ms. Luna that thought  
11 she was a bad congressional candidate, didn't like her,  
12 wanted here removed. Is that what you're referring to?

13 A No. It was him referring to her as a cunt --

14 Q Got you.

15 A -- among other horrible things that men don't  
16 say to females.

17 Q So his comments to you about her?

18 A Hi -- his multiple comments.

19 Q Okay. So when you tape -- when you tape  
20 secretive phone calls, and I know you've got a history of  
21 doing this. How do you do this? How -- how do -- what  
22 mechanism --

23 MS. JANES: Your Honor. I -- I'm going to  
24 object to Mr. Hayslett testifying.

25 THE COURT: Sustained.

1 MR. PERLMAN: I -- I would object as to  
2 relevance as well, Judge. I thought he opposed the  
3 recording. So I'm kind of confused. Does he want it  
4 in?

5 MR. HAYSLETT: No, no. I'm --

6 MR. PERLMAN: Because --

7 MR. HAYSLETT: -- talking -- she -- she's  
8 record -- but we'll get to that. I'll ask another  
9 question.

10 THE COURT: All right. I -- I'll overrule it.  
11 I -- I think he's allowed to ex -- she's testifying  
12 about her concerns about him. And --

13 MR. HAYSLETT: Correct.

14 THE COURT: -- I think he's allowed to fairly  
15 question her about her actions in light of those  
16 feelings that she was having at the time.

17 Q (By Mr. Hayslett) So Ms. Olszewski, what I want  
18 to know is practically, when you -- when you do secret  
19 phone calls -- when you tape people secretly,  
20 mechanically, walk us through how you do it. Because I  
21 understand why. I want to know how you do it.

22 Do you have a third-party app? Do you have an old  
23 fashioned tape recorder? How is it this -- when you have  
24 the premeditation to tape this call, how did you set that  
25 up?

1           A     Well, I felt that -- very threatened. And with  
2 that, I -- I -- I don't tape phone calls. I have never  
3 taped a phone call, ever. Ever. And I say that under  
4 oath. What I did is felt that for my own protection, and  
5 for my own safety, and for my own recollection based on  
6 his prior voice text that magically erases.

7           And it's not in writing. I needed to document this  
8 with never the intention of sharing it. With the  
9 intention of having it if something happens to me because  
10 I felt threatened by that message. So all I did was call  
11 him and I recorded it with another mobile device that I  
12 had.

13          Q     Okay. So that's what I'm trying -- I want to  
14 talk about the premeditation. I mean, you've recorded  
15 other people without their permission before. I want to  
16 know in this case, how did you do it?

17               MS. JANES: Your Honor, I'm going to again  
18 object to Mr. Hayslett testifying.

19               THE COURT: Sustained.

20          Q     (By Mr. Hayslett) So Ms. Olszewski, in this  
21 case, not other cases, in this case, how did you secretly  
22 record him? You said you had other -- another phone?

23          A     Yeah --

24          Q     Is that right?

25          A     -- another -- another -- it was an iPad,

1 actually.

2 Q An iPad. So is -- is it an app on your iPad? I  
3 mean, walk us through how you mechanically set this up.

4 A I just called him and put it on speaker and  
5 recorded it with my iPad.

6 Q With your iPad? Was there anybody else in the  
7 room?

8 A No. I was home by myself.

9 Q Okay. So when he voice texts you to call him,  
10 what was the time lag between that voice text before you  
11 were able to set up the secret recording device to make  
12 sure that you re -- you record this phone call without his  
13 knowledge? How much time elapsed there?

14 A A couple minutes.

15 Q Okay.

16 A Not even. Probably right -- almost immediately.

17 Q Okay.

18 A I --

19 Q So -- so at this point, he sent you the voice  
20 text. This is the same person that you were afraid of and  
21 concerned of. At -- at that point, at the voice text, did  
22 you ever indicate to him prior to recording the phone call  
23 that you didn't want to talk to him, or you didn't want  
24 any contact with him?

25 MS. JANES: Your Honor, asked and answered

1 repeatedly.

2 MR. HAYSLETT: No, I said prior to the phone  
3 call. We're now on the phone call between the voice  
4 text and the phone call.

5 THE COURT: I think if she ever told him that  
6 she didn't want --

7 MR. HAYSLETT: Oh, that might be ever --

8 THE COURT: -- have contact --

9 MR. HAYSLETT: I have may have -- forever --

10 THE COURT: -- at -- so I think --

11 MR. HAYSLETT: I'll take it forever.

12 THE COURT: -- if -- I think -- I'll think that  
13 is already asked --

14 MR. HAYSLETT: I'll take that as forever and  
15 ever.

16 THE COURT: -- and answered.

17 MR. HAYSLETT: That's fine.

18 Q (By Mr. Hayslett) Ms. Olszewski, so as you're  
19 preparing to make this secretly recorded phone call, you  
20 said it was in your home? Is that right?

21 A Yes, sir.

22 Q And when you called him back, did you call -- I  
23 don't know if iPads can call. You called him back from  
24 your phone or the iPad?

25 A I called him on my phone, and I recorded it with

1 my iPad.

2 Q Okay. And as you were secretly recording him,  
3 your intent was to record this for posterity?

4 A Can you -- can you define that?

5 Q I mean -- mean, to record it so you would have  
6 that as evidence?

7 A I didn't -- I was --

8 MS. JANES: Your Honor, she's -- again asking  
9 her questions that she has already answered  
10 repeatedly.

11 THE COURT: I do recall one time where she  
12 answered that. I think she indicated that she  
13 recorded it in case anything happened to her.

14 MR. HAYSLETT: I'll take that.

15 Q (By Mr. Hayslett) So as you're recording this,  
16 you call him from your mobile phone. You start recording  
17 with your iPad. Let's talk about that conversation. I  
18 think we agree at no time -- and I'll take note this time  
19 so I don't ask you a bunch of times.

20 At no ki -- time did you ever put Mr. Braddock on  
21 notice that you recorded a conversation without his  
22 permission?

23 A No.

24 Q Okay. And can we agree that from the beginning  
25 of your phone call, you never had the intent to tell him

1 that he was going to be recorded?

2 A No.

3 Q Okay. So when you get on the phone call, tell  
4 us how that phone call went. What does he say to you?  
5 And what do you say to him?

6 A I wanted to reiterate that I didn't -- I -- I  
7 didn't -- you -- you say "premeditated." I didn't plan on  
8 recording him. The -- it was, kind of, more an instinct  
9 when I received that threatening voice message.

10 So I -- I didn't plan on recording Mr. Braddock  
11 until -- un -- until that. And it was within, you know, a  
12 couple of minutes between these calls.

13 Q When -- when I say "plan," I apologize, I mean  
14 "time", meaning a time to reflect enough to get an iPad,  
15 put it next to your phone, set the whole thing up.  
16 Because I mean, obviously, you know what to do.

17 A Oh. It was right there. I work -- I work on my  
18 iPad, and I have my phone. So it's -- it was right in  
19 front of me. I -- I am constantly on it.

20 Q I understand. Did -- did -- after this was  
21 over, did you make statements to the St. Pete Police  
22 Department?

23 A I called the Pinellas County Sheriff's Office.

24 Q I understand. But did you ever speak to anybody  
25 from St. Pete PD?

1           A     I believe I spoke with them on the phone while  
2 they were over at Anna's house.

3           Q     Okay.

4           A     Briefly.

5           Q     The phone call which you testified about where  
6 he threatened, you said, Ms. Luna, with his hit squad. Is  
7 that right?

8           A     Mr. Braddock started off the phone call with,  
9 "I'm in pretty fucking deep." And he said that he's  
10 working with Freemasons; they've got millions of dollars.  
11 He's got Russian and Ukrainian hit squads. And that he  
12 reiterated that I am not to say anything over and over  
13 again. And this has to be kept between him and I.

14          Q     Did he talk about polling numbers?

15          A     He said that his Freemasons invested twenty  
16 thousand dollars into his poll -- pollers, or to watch the  
17 polls. And if they found that Anna was in the lead, then  
18 that's when he would make the call for a hit -- hit squad  
19 to murder her.

20          Q     I -- I want to talk about that for a second.  
21 And I think you shared that information with St. Pete PD.  
22 So the threat about the "hit squad" would be that once the  
23 poll was taken, and if Ms. Luna was ahead of him, then the  
24 hit squad would be ordered. Is that right?

25          A     That was one instance during the conversation.



1 But he also stated it multiple other times in the  
2 conversation outside of just that specific event that  
3 you're -- you're speaking on. But that is -- that is  
4 correct --

5 Q Well, I -- I -- I --

6 A -- in --

7 Q -- say that because the St. Pete PD --

8 A -- that one.

9 Q -- did their investigation. The State  
10 Attorney's Office did their investigation. They used  
11 something --

12 MS. JANES: Your Honor, I'm going to ask that  
13 Mr. Hayslett be instructed not to testify.

14 MR. HAYSLETT: I'm going to ask a question,  
15 though, Judge.

16 THE COURT: Okay. So I'll overrule that  
17 objection. I'll listen to the question and then --

18 MR. HAYSLETT: Sure.

19 Q (By Mr. Hayslett) Ms. -- Ms. Olszewski,  
20 obviously you're aware that an investigation was done.  
21 They took testimony from you. They listened to this tape,  
22 but it's not here today. Listened to the tape, and they  
23 used the term "conditional threat". And I want to talk to  
24 you about that "conditional threat", that word.

25 When you testified a second ago that there was (audio

1 malfunction) a mention. So I'm clear in what was said to  
2 you, that if Ms. Luna was ahead, he had Freemason people  
3 that were going to spend twenty thousand dollars on a  
4 poll. And if she was ahead of him, then he was going to  
5 have her taken out. Is that something he said to you?

6 A She's going to be gone.

7 Q Okay, going to be gone.

8 A Were his actual --

9 Q Okay.

10 A -- words I guess.

11 Q Me -- me -- meaning that -- that he wanted to  
12 win the election, right? That she would no longer be a  
13 candidate because she wouldn't be here, right?

14 A That -- that may be part of it. But he went  
15 onto say how they were going to do it --

16 Q Well, I -- I understand -- I understand the how.  
17 But let's talk about -- let me answer that question first.  
18 In regards to the statement he made to you -- which is  
19 pretty clear to you -- twenty thousand dollars for a poll  
20 if she is ahead of him -- meaning she's going to win the  
21 election, he would have her taken out. You knew at that  
22 point --

23 A He said --

24 Q -- he was running for congress, right, Ms.  
25 Olszewski?

1           A     He had intentions to, but he had not declared.  
2 But he did tell me that he had already paid the twenty  
3 thousand dollars --

4           Q     For the poll.

5           A     -- and there's (unintelligible), so.

6           Q     I understand. So it was made pretty clear to  
7 you that poll -- the money was paid for the poll. If she  
8 was ahead of him, then a hit squad would go out. And then  
9 he gave you great detail of how it was going to come out.  
10 Is that right?

11          A     Yes.

12          Q     Okay. So let me ask you this, what he intimated  
13 to you -- what he spoke to you about these threats,  
14 though, they were always conditional? Meaning that she  
15 had to be polling ahead of him for her to take him out  
16 (sic). Obviously, if she's polling 20 points behind, if  
17 she's losing the election, there's no reason to take him  
18 (sic) out.

19                The sole purpose that he wanted her taken out is he  
20 wanted to win and be a congressman.

21                MS. JANES: Your Honor, Mr. Hayslett is asking  
22 Ms. Olszewski to speculate about what it is that was  
23 on Mr. Braddock's mind.

24           Q     (By Mr. Hayslett) Ms. Olszewski, I just want to  
25 know if he -- what he --

1 THE COURT: All right. Hold on -- hold on a  
2 second. So --

3 MR. HAYSLETT: Sorry, go ahead. I apologize,  
4 Judge.

5 THE COURT: -- is there -- are you going to  
6 rephrase? So you're going to withdraw it? Or you  
7 going -- you -- up -- up to you if you want to --

8 MR. HAYSLETT: I'll -- I'll rephrase it.

9 THE COURT: Okay.

10 Q (By Mr. Hayslett) Ms. Olszewski, during the --  
11 during the entire conversation that you had with him, was  
12 it clear to you -- let me -- let me break it down in  
13 bite-size morsels. Was it clear to you that he didn't  
14 want her to be a congresswoman?

15 A Yes.

16 Q Was it clear to you that he thought she would do  
17 a poor job, and he thought just horrible things about her?

18 A Yes.

19 Q Is it clear to you that he wanted to win the  
20 election?

21 A Yes.

22 Q Is it clear to you that he saw her as a threat  
23 to him?

24 A Yes.

25 Q Is it clear to you that he thought she was

1 potentially more popular than him?

2 A Yes.

3 Q Was it clear to you that he thought she might  
4 have votes, or her poll numbers would be higher than his?

5 A Yes.

6 Q And was it clear to you that if, and only if  
7 that existed, that she was polling above him, then and  
8 only then, would he pull the trigger -- not pull the  
9 trigger -- enact whatever this hit squad was, that would  
10 take her out?

11 A I didn't perceive it as if and only then,  
12 especially the fact that he also threatened me if I was  
13 anywhere near her during her campaign.

14 Q Well, I'll get to that in a second. Let's talk  
15 about the "ifs". I mean, that's what allegedly you told  
16 and she told St. Pete PD. Are you saying that that's not  
17 the case?

18 MS. JANES: Your Honor, he has asked Ms.  
19 Olszewski for her understanding, for her perception,  
20 of the threats from Mr. Braddock. And she has  
21 answered what her perception was of Mr. Braddock's  
22 dangerousness.

23 MR. PERLMAN: Judge, if I may, I would add that  
24 that's improper impeachment. If he want -- has a  
25 prior statement that's inconsistent, he needs to

1 publish that first.

2 THE COURT: All right. Hold on a second. What  
3 was the -- what was the question again? Can you tell  
4 me it again?

5 MR. HAYSLETT: I kind of forgot, Judge. I --  
6 I -- I -- I think the -- the -- question was, I -- I  
7 think I -- I may have asked her if these are the  
8 conditional threats. And I think she already  
9 asked -- answered that. So I'm going to move on from  
10 that because I think that -- well, she's already made  
11 that clear.

12 Q (By Mr. Hayslett) Ms. Olszewski, I want to get  
13 to the threats against you. Because we've talked about  
14 threats again -- against Ms. Luna. So the threats against  
15 you, at this point, I think you shared with us. Prior to  
16 that phone call, he'd never made a direct threat against  
17 you. Is that right?

18 A Correct.

19 Q So during this phone call is the first time, as  
20 I understand it, that you felt that he had harassed you,  
21 stalked you, or threatened you; this is the first time in  
22 this phone call. Is that right?

23 A No, that's not the first time I felt that he was  
24 stalking me. I do believe that he was stalking me in --  
25 in terms of -- I do believe that he came to The Karol

1 Hotel because of me. And I do know that he was contacting  
2 multiple of my friends trying to reach me.

3 So I -- I -- I would say that this is -- that  
4 wouldn't be the -- the first time I felt that way.

5 A You said it would or would not be? I'm sorry.

6 Q It -- that -- this pho -- the recorded phone  
7 call would not be the first time that I felt that he was  
8 stalking me.

9 Q Got you. So you're saying he was -- he was  
10 harassing you earlier?

11 A I'm saying that I believe that he was stalking  
12 me earlier.

13 Q Okay. So let's take this phone call. We talked  
14 about the threats against Ms. Luna and the poll. Let's  
15 talk about the threats against you.

16 A Okay.

17 Q The threats against you, as I understand, was  
18 that he didn't want you to be around her. Is that  
19 correct?

20 A It -- it wasn't that he -- he didn't want me to.  
21 He made sure that I wouldn't and I -- I -- it -- he made  
22 sure that if I knew that if I was around her --

23 Q So is that --

24 A -- it would not be good for me.

25 Q It would not be good for you. So again --

1           A     He was demanding, essentially, that I -- I was  
2 not around her.

3           Q     Got you. So the -- the -- the warning to you  
4 was, and I'm going to paraphrase, don't be around Ms. Luna  
5 because if you're around Ms. Luna, if she's ahead of the  
6 polls, you might be collateral damage, and I'm inserting a  
7 little bit. The idea would be if you're around Ms. Luna,  
8 that's where the harm's going to come to you. Is that  
9 right?

10          A     In his own -- in his own words, he told me that  
11 I would be collateral -- collateral damage. And that --

12          Q     If you were around her?

13          A     If -- if I was around her.

14          Q     Okay. Got you. So it was pretty clear to you  
15 that if you were around Ms. Luna, and if she was ahead of  
16 the polls, you might be harmed. And you took that very  
17 serious.

18                 MR. PERLMAN: Judge, I apologize for  
19 interrupting. I just want to object because he --  
20 he's rephrasing her testimony which is not correct.  
21 There is no testimony from her that it was qualified  
22 to "only if" winning in the polls.

23                 And ea -- each question, to me, he tries to  
24 misstate her testimony, and it's improper.

25                 MS. JANES: I would join in that objection. I



1 was about to chime in and say the exact same thing  
2 when Mr. Perlman spoke up.

3 THE COURT: Okay. All right. So --

4 MR. HAYSLETT: Let -- let me give some  
5 clarification.

6 Q (By Mr. Hayslett) Ms. Olszewski, are you saying  
7 that there were times that Mr. Braddock threatened her  
8 with the hit squad that was not related to the polling?

9 A I think in that phone conversation, he said  
10 multiple times, you know, he did state in one -- this --  
11 this phone call was around 33 minutes. So we were talk --  
12 we talked quite some time. And in multiple times  
13 throughout this conversation, he stated that "she's going  
14 to be gone". He also stated in the conversation, he  
15 brought up Matt Tito, who is also a friend of his, and  
16 that he wouldn't feel the need to take him out. So that's  
17 why he was going (audio malfunction).

18 THE COURT: Hold on a second. She somehow --

19 MS. JANES: Ms. Olszewski, you -- you've gone  
20 silent.

21 THE COURT: Oh, yeah. We can't hear you, ma'am.  
22 She's not muted.

23 MS. JANES: Ms. Olszewski, I don't know what's  
24 going on, but we can't hear you.

25 THE COURT: All right. Now we can.

1 THE WITNESS: You can -- can you hear me?

2 THE COURT: Yep.

3 MS. JANES: Yes.

4 THE COURT: Now we can.

5 THE WITNESS: Okay. When did I --

6 THE COURT: I think --

7 THE WITNESS: -- when did I cut off?

8 THE COURT: I think you said that, "She's going  
9 to be gone." And then she -- you said something  
10 about --

11 MR. HAYSLETT: Matt Tito.

12 THE COURT: -- Mr. Tito.

13 THE WITNESS: Okay.

14 A Because in this same conversation, he brought up  
15 Matt Tito. And -- and stated that he wouldn't necessarily  
16 take him out because he's not as big as a threat. So he  
17 said that he just offered to pay Matt Tito five thousand  
18 dollars a month to just work with him instead because he  
19 wouldn't have a chance.

20 So my point is that he's talking nonchalantly about  
21 just taking people out. And when I mean taking people  
22 it -- out, he's stating that he just has to call his hit  
23 squad and it's done. And -- and so it's not just about  
24 the polls.

25 And I was incorporated into any of the -- every

1 single moment that he would say something, he would  
2 reiterate the fact that I'd better not fucking say  
3 anything or I'm going to be collateral, too.

4 Q Got you. Let me -- let me -- let me go back to  
5 this, the -- the allegations. So you're saying -- let me  
6 go back to Tito, then I'll get back to Ms. Luna. You said  
7 he didn't need to take Mr. Tito out because he wasn't a  
8 threat. Is that what you said?

9 A Yes.

10 Q When you say "threat", I -- I -- I would  
11 interpret -- you tell me if this is wrong, interpret that  
12 he would not be ahead of Mr. Braddock in the polls, that  
13 he would not be a threat to be a congressperson?

14 A I think --

15 MS. JANES: Your Honor, I'm going to object to  
16 Ms. Olszewski being asked to speculate about what Mr.  
17 Braddock meant.

18 MR. HAYSLETT: Well, Judge, here -- here's the  
19 issue. If she can speculate that she thinks he meant  
20 that they're to be killed, she can speculate whether  
21 or not they would -- going to be a candidate for  
22 congress. So it's either one or the both.

23 THE COURT: Well --

24 MR. HAYSLETT: Either she can spec --

25 THE COURT: -- hold on --

1 MR. HAYSLETT: -- you know --

2 THE COURT: -- hold on.

3 MR. HAYSLETT: Oh, go ahead.

4 THE COURT: So I think that the -- the -- I'm  
5 going to overrule it on the effect on the listener.  
6 Because isn't all of this conversation only relevant  
7 because it -- of the affects it has and the actions  
8 in sequence of events that occur after these -- this  
9 threatening conversation?

10 So I think her interpretation is important  
11 because one, it sets off a chain of events. And two,  
12 there's an element of substantial emotional distress.  
13 So her interpretation of what something meant is  
14 going to either be argued by one side or the other,  
15 could or could not have caused substantial emotional  
16 distress.

17 So I don't think -- I think that here  
18 interpretation of what it meant to her, not what Mr.  
19 Braddock mean -- meant by it, but what it meant to  
20 her is important. Because an element of an  
21 injunction for stalking is that substantial emotional  
22 distress was caused.

23 So her interpretation is not really to be  
24 imputed upon that actual intentions of Mr. Braddock.  
25 It is to substantiate or dispel the element of

1           substantial emotional distress. So I'm going to  
2           overrule that objection based upon that.

3           Q       (By Mr. Hayslett) So Ms. Olszewski, in regard  
4 to Mr. Tito, then, you believed that he didn't feel he was  
5 a threat because he was not as popular as Mr. Braddock;  
6 therefore, wouldn't win an election necessarily?

7           A       I actually think it -- it's probably more so  
8 that Mr. Braddock and -- and Matt Tito were actually  
9 friends. He also stated in the phone call that he, you  
10 know, had bent -- went to -- for drinks with Matt Tito a  
11 couple days pri -- you know, prior.

12           So I do feel that, you know, that might've been  
13 incorporated. The fact of the matter is, he stated that  
14 you know, Matt Tito wouldn't necessarily require a hit  
15 squad.

16           Q       Got you.

17           A       And that's his own friend. So what is he going  
18 to do to someone like me --

19           Q       What do --

20           A       -- if he finds out that I am friends with Anna.

21           Q       Got you.

22           A       And --

23           Q       Well -- well my -- my question is more than  
24 context where you said that Mr. -- you said he said, "Mr.  
25 Tito wasn't as much as a threat." What did that mean to

1 you?

2 A I - I don't -- I mean, I -- maybe -- maybe it  
3 had to do with running. Maybe it had to do with the fact  
4 that they're friends. Maybe it -- it could have been a --  
5 a multiple different reasons.

6 But all I know is he spoke very nonchalantly about a  
7 hit squad, that he wouldn't need to call a hit squad for  
8 him. But everybody else, he doesn't have a problem with.

9 Q Got you. Is there any -- any of these threats  
10 against Ms. Luna, did any of those threats occur without  
11 the conditional part of it? Meaning that she would be  
12 ahead of him, ahead of the race, polling higher.

13 A Throughout the phone call, like I said earlier,  
14 that -- it was that one portion of the phone call that he  
15 talked about the polling. But multiple times throughout  
16 the phone -- the phone call, he talked about how he would  
17 do it.

18 And he didn't speculate -- or -- or he didn't state  
19 if it would be because of the polls. But multiple times  
20 he, you know, he was stating in very vulgar terms -- I  
21 think he referred to her as "a squirrel that I run over,  
22 over, and over again." And no matter what, she's not  
23 going to -- she won't win.

24 Q And -- and -- and --

25 A So --

1 Q -- what do you mean --

2 A -- I don't know that --

3 Q -- win -- what do you mean by "win"?

4 A Can -- can you rephrase that?

5 Q You said he said, "No matter what, she wouldn't  
6 win." What do you mean by "win"? What was your  
7 interpretation of "win"?

8 A Win the race.

9 Q The congressional race?

10 A Correct.

11 Q Did he ever clarify to you at any point that  
12 these threats were not conditional?

13 A Can you define "conditional" just so I make  
14 sure --

15 MS. JANES: Your Honor. Your Honor, I'm going  
16 to ask that Mr. Braddock be asked to go off screen  
17 and to stop displaying a political message to my  
18 client while she is testifying?

19 MR. HAYSLETT: I didn't see anything.

20 THE COURT: Oh, I didn't see it.

21 MS. JANES: I -- I -- I mean, I can -- I can  
22 describe for the record exactly just what happened,  
23 and it was inappropriate.

24 THE COURT: Okay. Mr. Braddock, I'm going to --  
25 I'm going to have you turn your camera off.

1 MS. JANES: And I would view it as a veiled  
2 threat -- not very veiled.

3 THE COURT: All right. So we'll take a break  
4 from the testimony right -- Ms. Janes, what -- what  
5 was -- I didn't see it either, but --

6 MS. JANES: Okay. Mr. -- Mr. Braddock just --

7 MR. PERLMAN: Madam Judge, I just make sure  
8 we're on the record.

9 THE COURT: We are. We're always on the record  
10 in here.

11 MR. PERLMAN: Thank -- thank you.

12 THE COURT: (Unintelligible) and injunctions are  
13 always recorded. Everything we do in court on an  
14 injunction --

15 MR. PERLMAN: Thank you.

16 THE COURT: -- is recorded.

17 MS. JANES: Okay. Mr. Braddock just put himself  
18 on camera. He moved his camera so that the words on  
19 his shirt were visible, opened his jacket so that the  
20 words on his shirt were visible, and displayed the  
21 words "Roger Stone."

22 If -- if Your Honor would like, we can go into  
23 more detail why I think that is an inappropriate  
24 political message and veiled threat. But --

25 THE COURT: Okay, Mr. Braddock, can you please



1 turn your camera on?

2 MR. HAYSLETT: I -- I'm not tracking --

3 THE RESPONDENT: Yes, Your Honor.

4 THE COURT: What?

5 MR. HAYSLETT: I don't know -- I don't  
6 understand "Roger Stone." Somebody's going to have  
7 to explain that to me.

8 THE COURT: Okay. All right. So can you stand  
9 up so that we can see your shirt? Okay. Can you  
10 move your jacket?

11 THE RESPONDENT: It's nothing threatening, this  
12 is actually pretty childish.

13 THE COURT: Well, I -- I guess here's the --  
14 here's the theory here. Is that one, why are you  
15 going on camera when you haven't been on camera this  
16 entire hearing, other than maybe when you were sworn  
17 in?

18 Two, why are you manipulating -- getting on  
19 camera, and then manipulating your camera? So I  
20 guess I'm trying to understand I mean, you say this  
21 is "childish"? I'm in the middle of --

22 THE RESPONDENT: I forgot I (unintelligible) --

23 THE COURT: -- I -- I'm trying to listen --

24 THE RESPONDENT: -- Your Honor.

25 THE COURT: -- to a witness, and I mean, to turn

1 a camera on does take some addi -- intentional  
2 actions. And then to move a camera, it takes  
3 intentional actions. So I'm really trying to  
4 understand what we're doing here.

5 Because we're really just trying to get the  
6 evidence and determine the end. So I -- and I'm not  
7 sure when you say this is "kind of childish", I'm not  
8 really sure whose actions you're referring to are  
9 childish.

10 THE RESPONDENT: I apologize. I had just sat  
11 back down, and I accidentally turned the camera on.  
12 I wanted to make sure that it was focused on me.

13 THE COURT: Okay. And what does your shirt say?  
14 I don't even -- I couldn't even read it with the  
15 quick --

16 THE RESPONDENT: The shirt says, "Roger Stone  
17 did nothing wrong."

18 THE COURT: Okay. All right.

19 THE RESPONDENT: How is that related to this  
20 hearing or this case --

21 THE COURT: Okay. Hold on --

22 THE RESPONDENT: -- or anything?

23 MR. HAYSLETT: William.

24 THE COURT: -- a second, sir. You're  
25 represented by an attorney who can make any arguments

1 for you.

2 All right. So sir, it's either all or nothing.  
3 Either you're going to be on the camera, or you're  
4 not going to be on the camera. I mean, I could  
5 require everybody to be -- be on the camera. But I'm  
6 giving everybody a little bit of grace because this  
7 is a particularly long hearing.

8 But -- but I'll -- if -- if it's going to be  
9 distracting, you know, it almost incentivizes for the  
10 camera to be off. Or there's a potential of concern  
11 of intimidation, maybe it does incentivize to keep  
12 the camera off.

13 But I -- I don't need -- you know, just because  
14 you're not sitting in here in the courtroom where  
15 everybody is being given the luxury of not doing  
16 that, and that is at the grace of the Court. Because  
17 we do injunction hearings in person every single day  
18 of the week. And aside from the person who showed up  
19 at the courthouse with COVID yesterday, they go  
20 smoothly. Okay?

21 So the reason why you are not here is because of  
22 the grace of the Court. So don't make me regret that  
23 decision by moving around a lot or being distracting.  
24 Because technically, you could be sitting here in  
25 these somewhat comfortable chairs and -- and

1 listening to everything.

2 So the fact that you can freely get up and go to  
3 the bathroom, and you don't have to wait for me to  
4 take a -- a break, which I don't take very often,  
5 should not be something that anybody should be taken  
6 for granted here.

7 Do you understand what I'm saying, sir?

8 THE RESPONDENT: Yes, ma'am. I apologize.

9 THE COURT: Okay. So please turn your camera  
10 off. And when we are ready for you to testify, we  
11 will ask you to turn it back on.

12 All right.

13 MS. JANES: And -- and do -- do you need me to  
14 put on the record why I feel like references to Roger  
15 Stone would be threatening to this witness? Because  
16 I can, but I -- I feel like we're going to go down a  
17 rabbit trail.

18 THE COURT: I -- I think that -- I guess, here's  
19 my question.

20 Ms. Olszewski, did you -- did you consider that  
21 a threat, or did you --

22 THE WITNESS: Yes.

23 THE COURT: -- even see the shirt?

24 THE WITNESS: A very large threat.

25 THE COURT: Okay. Did you even see the shirt?

1 THE WITNESS: Yeah. I --

2 THE COURT: Okay. So --

3 THE WITNESS: -- looked at him.

4 THE COURT: --

5 MR. HAYSLETT: What's the threat with Roger  
6 Stone?

7 MR. COX: That's just your neck of the woods,  
8 not mine.

9 THE COURT: I will allow and redirect for Ms.  
10 Janes to inquire related to that situation. I want  
11 to stay on target on what we're talking about. Mr.  
12 Braddock is not going to reengage his camera. And  
13 I'll allow for redirect related to that.

14 And if Mr. Hayslett wants to discuss that during  
15 his cross, he can. All right. You may continue, Mr.  
16 Hayslett.

17 MR. HAYSLETT: Sure. Sorry about that.

18 Q (By Mr. Hayslett) Ms. Olszewski, my -- my  
19 question was, I think, at any time did Mr. Braddock ever  
20 clarify to you that all of these threats of violence to  
21 Ms. Luna were not conditional?

22 A Oh, I think -- I think I remember where we are.  
23 I asked if you would be able to just clarify what you --  
24 what you meant by that. And I -- I feel that maybe -- or  
25 my attorney -- I -- I don't remember. I -- I just asked

1 to have --

2 THE COURT: I think she wants you to define the  
3 word "conditional".

4 MR. HAYSLETT: Okay. Thank you. Thank you.  
5 What I -- what I was saying is -- and -- and I don't  
6 want to get an asked and answered. But I -- I asked  
7 you about what had happened. I talked about the  
8 twenty thousand dollars in polling, that if -- if he  
9 was ahead -- or she was ahead, he would have her  
10 taken out.

11 I then asked you questions. You gave us a lot  
12 of information about the hit squad, how'd it would  
13 go, it'd be up and close and personal.

14 Q (By Mr. Hayslett) My question is at any point,  
15 did he clarify to you that the threats against Ms. Luna  
16 are -- were not connected to her being ahead of him in the  
17 polls?

18 A The only -- the only time he clarified was at --  
19 was that once. But the rest of the conversation, he was  
20 discussing how well connected he is to these hit squads.  
21 So I perceived it as it didn't really matter if it was  
22 polls or not.

23 And I also perceived that if he found out that I was  
24 friends with her, which I did not disclose this to him,  
25 then I would definitely been collateral. Because he had

1 told me that numerous times throughout the phone call that  
2 I -- I would be collateral. And he knew that I had  
3 children. And he would hate to do that to them.

4 And that it would be for the -- it's hard to even say  
5 it. It'd be for the greater good of the country.

6 Q I un -- understand the word that you perceived  
7 that way. I want to know if out of his mouth, his words  
8 to you -- his words to you, not how you perceived it. His  
9 words to you, did he ever clarify to you that any of these  
10 threats were not tied to that conditional threat of her  
11 being ahead of him in the polls and potentially winning  
12 the congressional seat?

13 A He stated to me that if I was anywhere near him  
14 (sic) that I would be collateral. I don't know what that  
15 means. I don't know if that meant if I was at a rally  
16 next to her. I don't know if that means that if I we were  
17 having lunch. I don't know if that means if we're having  
18 coffee. I don't know.

19 Q Okay.

20 A I don't know. He perceived -- I don't know what  
21 his perc -- I don't know what he perceived it was. All I  
22 know is that I've never had anybody tell me how they were  
23 going to kill me and have a plan for that or another  
24 female. So that's how I just perceive it.

25 Q And -- and -- no, I understand this. And I --

1 and I -- and I -- probably had a bad -- asked a bad  
2 question. My question's not how you perceived it. I  
3 would like to get an answer to this because I don't think  
4 you've answered it.

5 Is other than the time, and I understand that other  
6 stuff he told you, did he ever clarify to you -- ever say  
7 to you that the threats were not connected to her being  
8 connected to her being ahead of the polls and winning?

9 A I don't -- I -- mul -- like, he just talked  
10 about his hit squads and all he had to do was -- I -- I  
11 mean, I -- I don't know exactly what it meant. I really  
12 truly am answering it to the, like -- honestly.

13 I -- I don't know if it -- if it meant -- you know, I  
14 know that if she would come close to winning, he said he  
15 would take her out. But he also stated that, you know,  
16 there's no way that she's going to win. So does that mean  
17 that he would do it sooner? I don't know, you know, so  
18 that's just my honest answer.

19 Q I -- no, I appreciate it. Let -- let me ask it  
20 maybe a better -- a better way. Did he indicate to you  
21 that he was going to have her killed the next day?

22 A No.

23 Q Did he indicate to you he was going to have her  
24 killed the next week?

25 A No. He didn't have a timeframe at all.



1 Q The only timeframe at all that he gave to you  
2 was the connection to the polling and her being ahead and  
3 winning the election?

4 A That's -- that's the -- yes.

5 Q I understand. Okay. I think that's pretty  
6 clear. Let's get back to the threats against you. The  
7 threats against you were always conditional upon, meaning  
8 that they would take place if you were near her, that  
9 you'd be collateral -- collateral damage. Is that right?

10 A I think that he stated that multiple times. But  
11 he also stated that you know, he -- he stated multiple  
12 times if I was connected to her. So I don't know what  
13 that means. It doesn't necessarily mean physically near  
14 her but connected to her. That can be him finding out  
15 that I'm friends with her.

16 Q When you say "collateral damage," what was your  
17 interpretation of collateral damage?

18 A Well, collateral damage is a -- a military term  
19 that we use for essentially removing a subject. And  
20 removing a subject is murdering them. And he doubled down  
21 on that with, you know, "I would hate to do it. But it  
22 would be for the greater good of the country."

23 Q The collateral --

24 A "Even though I know you have children."

25 Q I understand. So the collateral damage was if

1 you were standing next to Ms. Luna, even though you were  
2 not the intended target, you might also be targeted  
3 because you were near her; hence the word "collateral  
4 damage."

5 A He used "collateral" -- we're connected so what  
6 does that mean? I don't know.

7 Q Got you. Did he ever threaten directly, other  
8 than clarifying the terms "collateral damage,"  
9 "connected," or "being around" Ms. Luna?

10 A Multiple times during this phone conversation,  
11 he made sure that I didn't fucking say anything, that I  
12 didn't tell anybody. So I would -- I would think that  
13 that would -- that's a pretty heavy threat as well.

14 Q I understand. Did -- and I'm -- I'm looking  
15 through here, everything you've written and all the  
16 statements you've made. Did he ever indicate to you that  
17 if you said something you'd be killed? Is that what  
18 you're claiming?

19 A I -- if I said something I would be killed?

20 Q Did he -- are you saying that's what he told  
21 you?

22 A I'm just saying I perceived that as another --  
23 as another threat that if he found out that I said  
24 anything that that would possi -- that would be a  
25 possibility.

1 Q And that's what he told you that if you said  
2 something, your death would be a possibility. Those his  
3 words?

4 A Not a -- I mean, that's what I perceived him as  
5 stating and why he was stating it.

6 Q Got you. During this phone call, obviously,  
7 very emotional for you. Is that right?

8 A The -- the phone call with the -- the recorded  
9 one we're discussing right now, wa -- was it --

10 Q Right.

11 A -- emotional?

12 Q Yes.

13 A It was terrifying.

14 Q I assume you were frightened?

15 A Yes.

16 Q And during this phone call, you said -- did you  
17 have the ability to disconnect from that phone call?

18 A Absolutely I -- I could have hung up.

19 Q And -- and you --

20 A But if someone's threatening to murder somebody,  
21 you want to get all the information possible so you can  
22 make sure you alert authorities. I know that much.

23 Q Got you. So you -- you extend this phone --  
24 phone conversation that you recorded illegally, you said  
25 it -- was it 33 minutes?

1 A Approximately.

2 Q Okay. You've got this phone call now. After  
3 you're done and you hang up with him, what's the next  
4 thing you do once you have this -- this phone call. I  
5 guess it's on your iPad. Is that right?

6 A Yes, sir.

7 Q Okay. What did you do with that evidence at  
8 that point? Who's the first person you call?

9 A I called Anna to let her know that there's -- we  
10 need to call the police.

11 Q Any reason why you chose to call Anna before you  
12 called the police?

13 A Because it was a direct threat on Anna's life.  
14 And I wanted her -- I -- I -- we decided -- I wanted her  
15 to call the police, and I was also going to call the  
16 police. And that's exactly what we did.

17 Q Did she ask you to play the phone call for  
18 you -- for her?

19 A No.

20 Q She never asked to hear it?

21 A No. I explained it to her about what he said.  
22 We -- it was a matter of minutes.

23 Q So you never played the phone call for her?

24 A The original message that I -- that the voice  
25 message I had played for her.

1 Q Did you record that?

2 A And that was -- that was legally recorded  
3 because it was a voice -- a voice text.

4 Q I understand. Did you -- did you record that  
5 voice text that you played for her? Did she record it?

6 A I -- I recorded the voice text. And she had  
7 heard that prior to the conversat -- prior to the phone  
8 call.

9 Q In this phone call where you allege that -- that  
10 he was going to have the hit squad come out, you never  
11 played it for her?

12 A No. No. I actu -- we -- I -- at that point, I  
13 called her. We both called police and we sent it --  
14 that's --

15 Q So to this -- so -- so to this day, she's never  
16 heard it?

17 A I -- I'm sure she's heard it. It was -- I gave  
18 it to authorities --

19 Q Okay.

20 A -- per their request.

21 Q But your testimony is that she never was  
22 played -- you never played the phone call for her that  
23 night?

24 A The -- the 33-minute phone call for her that  
25 night, no.

1 Q And she never heard it in your poss -- in your  
2 presence?

3 A No. I was at my house. And she was at her  
4 house.

5 Q And you shared that --

6 A And --

7 Q -- recorded phone call with the police. And you  
8 said -- I think you said you sent it to her cama --  
9 campaign manager. Is that right?

10 A Yeah. So the police were -- the St. Pete Police  
11 were at her house. And the sheriff detectives were at my  
12 house. And through the -- through them, that's how the  
13 audio was shared.

14 Q Did you share it with anybody other than the  
15 police and Ms. Luna's campaign manager?

16 A I have never shared this video with anybody,  
17 including the media.

18 Q What -- what you had a video?

19 A Well, it's a video of the phone.

20 Q Oh. I didn't realize that. It was -- it was a  
21 video of the phone?

22 A Yes, sir.

23 Q Okay. So it's -- it's a video of -- iPad taking  
24 a video of the -- of the cell phone?

25 A Yes, sir.

1 Q Okay. I'm sorry. You said you did not share it  
2 with her campaign manager or you did?

3 A I -- well, the police -- St. Pete Police were at  
4 her house. So they -- and her campaign manager is how we  
5 shared it with the police, and how I also shared it with  
6 the sheriff's detectives that requested it. And we did  
7 that through their Dropbox under the proper authorities.

8 Q So other than the fact that it got shared with  
9 the sheriff's office, St. Pete Police, and Anna Luna's  
10 campaign manager, did it get shared with anybody else  
11 you're aware of?

12 A I've never shared the video or made anything  
13 public.

14 Q Do you still have -- are you in possession of  
15 it?

16 A Yes.

17 Q Is it on your iPad?

18 A Yes.

19 Q Currently?

20 A Yes.

21 Q Okay.

22 MR. HAYSLETT: Judge, can I have a second?

23 THE COURT: Yes.

24 MR. HAYSLETT: Nothing else, Judge.

25 THE COURT: Okay. I'm going to ask a couple

1 questions before I open it up for redirect.

2 All right. I'm trying to understand a little  
3 bit more about this timeline. So we have on May  
4 27th, the hotel forum that you're speaking at.

5 THE WITNESS: Um-hum.

6 THE COURT: Other than him, Mr. Braddock, being  
7 called on by you as a potential speaker or somebody  
8 to ask a question, do -- have any other physical  
9 interaction with him at that event?

10 THE WITNESS: No.

11 THE COURT: Okay. So is it -- what are those --  
12 I'm imagining a -- a forum where you call people in  
13 the audience, somebody stands up, they say something,  
14 and either you respond, or maybe it didn't get  
15 responded to.

16 But like afterwards, he doesn't approach you?  
17 He doesn't meet you in the parking lot? You don't  
18 even have any contact?

19 THE WITNESS: No, Your Honor. And --

20 THE COURT: Okay.

21 THE WITNESS: -- may I ask a question?

22 THE COURT: Sure.

23 THE WITNESS: Can you turn the camera around?  
24 It's just easier to --

25 THE COURT: Sure. All right. I'm just trying



1 to understand --

2 THE WITNESS: Okay.

3 THE COURT: -- the extent of all the -- the  
4 context. Okay. So then, after you have this event  
5 where you first observe him. After that, about week  
6 later, there's call number 1, which is a call that  
7 you placed to him. Is that correct?

8 THE WITNESS: He called me.

9 THE COURT: Okay. So between -- in that week  
10 timeframe or so -- so you see him at this event --

11 THE WITNESS: Um-hum.

12 THE COURT: -- who -- how do you have any  
13 other -- so does a third party reach out to you? I  
14 guess Ms. -- let me --

15 THE WITNESS: Audra.

16 THE COURT: All right. Audra -- is that  
17 correct?

18 THE WITNESS: Yes, ma'am.

19 THE COURT: Okay. So how long after that event  
20 does Audra reach out to you?

21 THE WITNESS: I think a couple days.

22 THE COURT: Okay. So a couple days afterwards,  
23 Audra reached out to you to try to connect you and  
24 Mr. Braddock. Is that correct?

25 THE WITNESS: Yes.

1 THE COURT: Okay.

2 THE WITNESS: I guess she had -- he had  
3 contacted her multiple times, but she just didn't  
4 tell me.

5 THE COURT: Uh-huh. So at that --

6 THE WITNESS: So --

7 THE COURT: -- at that time, do you find out  
8 she -- he's reached out to her a couple of times and  
9 she hasn't contacted you? Or does she just say that  
10 she tried -- is trying to connect the two of you?

11 THE WITNESS: She -- when she finally asked me  
12 if I wanted to take his number, she said that he's  
13 been trying to contact me. But she just felt a  
14 little bit off about him. And I was -- you know,  
15 it's not uncommon for me to interact with people that  
16 are, you know -- I -- some people are odd. So I -- I  
17 did take the phone call --

18 THE COURT: Okay. All right.

19 THE WITNESS: -- at that point.

20 THE COURT: Hold -- hold on a second. So when  
21 she said that he's been trying to contact you  
22 multiple times, did you take that to mean through  
23 her, or was that -- because you said that other  
24 people had been receiving messages and -- and  
25 attempts at contact.

1           So at that time, were you informed that multiple  
2 people -- he's been trying to reach out to multiple  
3 people? Or were you just informed through her? Or  
4 did she even expound as to what he meant -- what she  
5 meant by he's been trying to contact her -- you?

6           THE WITNESS: He definitely went through Audra.  
7 He might have went through Amanda as well.

8           THE COURT: Well, no. I have, like, what did  
9 Audra -- at the time --

10          THE WITNESS: Oh.

11          THE COURT: -- that you're talking to Audra  
12 three days later after this hotel event, Audra says  
13 that he's been trying to reach out to you multiple  
14 times. Is that correct?

15          THE WITNESS: Yes.

16          THE COURT: Okay. Does she say through multiple  
17 people? Or does she mean through her? Or does  
18 she --

19          THE WITNESS: Through --

20          THE COURT: -- even say?

21          THE WITNESS: -- her. Yeah, it's -- it's  
22 through her. And then, there's --

23          THE COURT: Okay.

24          THE WITNESS: -- I -- I'm --

25          THE COURT: All right. So let's just stay on

1 this Audra conversation for a second.

2 THE WITNESS: Okay.

3 THE COURT: We'll get to the other people that  
4 you find out about. So at that point in time, does  
5 she get permission for -- from you to give her --  
6 your number to him? Does she ask -- do you take his  
7 number? How does that play out?

8 THE WITNESS: She shared my number with him.

9 THE COURT: Okay. So she gets --

10 THE WITNESS: With --

11 THE COURT: -- your permission to share your  
12 number?

13 THE WITNESS: Yes.

14 THE COURT: Okay. All right. And after that  
15 conversation concludes with Audra, how long until he  
16 calls you?

17 THE WITNESS: It was that evening, Your Honor.

18 THE COURT: Okay.

19 THE WITNESS: So --

20 THE COURT: All right. That's fine. And is  
21 that evening when call 1 happened? Or does he call  
22 you, and you (sic) leave a message because you don't  
23 know his number. Or like, what -- walk me through  
24 the sequence of events. Because it really is  
25 important to the actual -- somewhat my -- nature of

1 the details of how this physically plays out. And I  
2 don't think I have a lot of very specifics about  
3 this.

4 So that evening, you receive a call. Do you  
5 answer it?

6 THE WITNESS: Yes, it was at midnight --

7 THE COURT: Okay.

8 THE WITNESS: -- that evening.

9 THE COURT: Okay. And is that what we would  
10 phrase as "call 1"?

11 THE WITNESS: Yes, Your Honor.

12 THE COURT: Okay. So call 1 he -- initiated by  
13 the respondent. And -- and that was my other  
14 question, is what time? So it was midnight?

15 THE WITNESS: Right around midnight --

16 THE COURT: Okay.

17 THE WITNESS: -- yes, ma'am.

18 THE COURT: All right. And then I think you  
19 talked about already the context of that phone call  
20 and where it started and where it went. And I think  
21 I understand that. All right. So then I guess  
22 before he calls you -- or when do you learn about the  
23 fact that he's been reaching to other people aside  
24 from Audra?

25 THE WITNESS: Are -- to contact me?

1 THE COURT: Yes. Like you said that --

2 THE WITNESS: Or --

3 THE COURT: -- had been reaching out to  
4 multiple. Obviously , at some point in time you  
5 learned that he had been reaching out to multiple  
6 people. So like, when was that? Was that after the  
7 threatening phone call? And then all of a sudden  
8 this information came in? Or was it after you talked  
9 to Audra? Or is it after call 1? Like, I'm trying  
10 to understand --

11 THE WITNESS: Okay.

12 THE COURT: -- I -- I have to understand. And I  
13 have to determine one, a re -- if a reasonable  
14 person, and given those circumstances of what had  
15 happened in this sequence of events, would reasonably  
16 be -- have a substantial emotional distress.

17 So the only way I can determine that is if I  
18 know the sequence of the way things happened and what  
19 you learned when you learned them. So --

20 THE WITNESS: Um-hum.

21 THE COURT: -- I'm trying to understand that, so  
22 that I can make that determination. So when did you  
23 learn that he had reached out to other people other  
24 than Audra to try to reach out to you?

25 THE WITNESS: Audra told me this.

1 THE COURT: Okay. So when you're talking to  
2 Audra, she told you other people. Did she name those  
3 specific people?

4 THE WITNESS: No. I want to say like -- because  
5 they have -- it's called the Community Patriot.  
6 Like, they have a group. So he was asking about me.  
7 I don't know -- I don't know who he was -- you know,  
8 I don't know who he was specifically asking. But --

9 THE COURT: Okay. So --

10 THE WITNESS: -- he was asking multiple people  
11 how he can get ahold of me. And -- and I want to say  
12 that -- and I don't know. I -- I think that -- so --  
13 somebody had told him that Audra and I are friends.

14 THE COURT: Okay. All right. So --  
15 (Unintelligible verbalization.)

16 THE COURT: -- let me just ask you. When you  
17 say he has -- there's this Community Patriot group.  
18 Is that a Facebook group?

19 THE WITNESS: It is, but they also have  
20 in-person meetings --

21 THE COURT: Okay.

22 THE WITNESS: -- every Wednesday. So he  
23 actually went to one of those meetings, which is what  
24 I referred to earlier that I've been avoiding that I  
25 usually go to.

1 THE COURT: Okay --

2 THE WITNESS: That I've actually spoken at.

3 THE COURT: And so how do you know that he went  
4 to one of those meetings? Was that in this  
5 timeframe? Or is this, like, when you were doing  
6 your, you know, independent research you saw a  
7 picture of him at one of these meetings? Or he  
8 checked in -- I don't know what the -- the social  
9 media terminology is.

10 THE WITNESS: Because I -- I know that Audra and  
11 Amanda, they both run that meeting, so. And we  
12 were -- and Audra is already the -- the one that  
13 alerted me that he's a little bit off, so --

14 THE COURT: Okay. So -- and so -- I --

15 THE WITNESS: -- he told me --

16 THE COURT: -- let me rephrase my question.  
17 How -- how did you learn that he had been to one of  
18 these meetings?

19 THE WITNESS: Because Audra told me; they run  
20 it. So she told me that he was there.

21 THE COURT: Okay. All right. So this is all  
22 part of this contact -- conversation with Audra where  
23 she's getting your permission --

24 THE WITNESS: Yeah.

25 THE COURT: -- to --



1 THE WITNESS: Yes.

2 THE COURT: -- to pass along your number? All  
3 right.

4 THE WITNESS: Yes.

5 THE COURT: All right. And so Audra tells you,  
6 along with the fact that he's contacted her multiple  
7 times, she indicates that he's reached out to -- was  
8 it other people, or the group, or? I mean, does she  
9 specifically say anybody in particular?

10 THE WITNESS: I believe that he was just asking  
11 around --

12 THE COURT: Okay.

13 THE WITNESS: -- to people within the  
14 organization, maybe, or at the event how he can get  
15 ahold of me.

16 THE COURT: All right. All right. I'm just  
17 trying to envision how this is all playing out. All  
18 right. So you learn all of that information -- at  
19 least get that background information prior to  
20 receiving this phone call -- the first phone call  
21 from Mr. Braddock. Is that correct?

22 THE WITNESS: Correct.

23 THE COURT: Okay. All right. And -- and the  
24 fact that he's been trying to get ahold of you, does  
25 it -- does -- were you ever told that there was a

1 specific reason, or?

2 THE WITNESS: He wanted me to speak on a  
3 healthcare summit board that he was putting together.  
4 But the reason that I found it odd is because Audra  
5 also told me that prior to him wanting me to be on  
6 it, he essentially wanted to avoid any nurses like  
7 myself.

8 THE COURT: Okay.

9 THE WITNESS: Specifically, you know, like  
10 I'm -- advocate for medical freedom. And so she  
11 found it odd that he was wanting me -- you know,  
12 wanting to contact me. And I also did, too. But I  
13 wanted to learn more.

14 THE COURT: Okay, learn more about him, or learn  
15 more about the summit?

16 THE WITNESS: Both.

17 THE COURT: Okay. All right. So the first call  
18 comes in where the respondent dials your phone number  
19 that's given to him by Audra at midnight. Is that  
20 correct?

21 THE WITNESS: That's correct.

22 THE COURT: Okay. And that was approximately a  
23 couple of days to a week after this first time you  
24 saw him at this forum?

25 THE WITNESS: Yes, Your Honor.



1 THE COURT: Okay. And how long was that phone  
2 call?

3 THE WITNESS: It was probably about a half an  
4 hour.

5 THE COURT: Okay.

6 THE COURT: All right. And correct me if I'm  
7 wrong. It starts out him speaking to you about the  
8 summit and then it turns into him speaking to you  
9 about Ms. Luna. Is that correct?

10 THE WITNESS: Yes.

11 THE COURT: Okay. All right. I just want to  
12 make sure -- and I'm not getting -- I'm not going to  
13 rehash all the details because I think you were --

14 THE WITNESS: Um-hum.

15 THE COURT: -- very detailed and clear about  
16 part of that conversation. But I just need to  
17 understand.

18 All right. So after you have this 30-minute  
19 conversation at midnight with him, what is the next  
20 contact either through a third party, directly to  
21 you, either in person, or any kind of electronic  
22 communication?

23 THE WITNESS: It was text message just asking  
24 him -- or he had texted me that things were delayed  
25 with the email. Because I -- I had requested that he

1 send to me -- send me the -- I -- I -- the email that  
2 included everybody else on the summit so I knew who I  
3 was --

4 THE COURT: Okay.

5 THE WITNESS: -- going to be affiliated with. I  
6 wanted to know more about who they were. And that  
7 never came. So I -- I had texted him that I never  
8 got a -- an email, if he could resend it.

9 THE COURT: Okay. So let's just --

10 THE WITNESS: So that's pretty much it.

11 THE COURT: -- pause there for a second. Okay.  
12 So this phone call ends with you -- do you commit to  
13 the summit? Or do you indicate that you want to get  
14 more information? Like -- what -- how does this  
15 end -- the phone call?

16 THE WITNESS: I just wanted to get more  
17 information. I did not commit to anything.

18 THE COURT: Okay. So you indicate, "send me an  
19 email." And correct me if I'm wrong, because I'm --  
20 I think this is what you're saying. But --

21 THE WITNESS: Um-hum.

22 THE COURT: That you indicate to him that you  
23 want to get more information and you want him to  
24 email it to you?

25 THE WITNESS: Correct. But I had no intention

1 of being on the -- the panel.

2 THE COURT: Okay. So you tell him -- you give  
3 him your email address at that time. Is that  
4 correct?

5 THE WITNESS: Yes.

6 THE COURT: Okay. And so the first text  
7 message, is it from you to him about the email? Or  
8 is it from him to you about whether the email -- the  
9 delay?

10 THE WITNESS: And I -- a believe it was him to  
11 me letting me know that it was being delayed.

12 THE COURT: Okay. And when was that?

13 THE WITNESS: A day or two after the phone call.

14 THE COURT: Okay.

15 THE WITNESS: And --

16 THE COURT: And do you respond to that text  
17 message?

18 THE WITNESS: Yes.

19 THE COURT: Okay. And do you immediately  
20 respond? Do you give it a couple of days? I mean,  
21 I -- I need to understand. This is a short period of  
22 time. I need to understand the sequence of events.

23 THE WITNESS: I said, "okay". I believe -- I --  
24 I'm -- I wish I had this in front of me right now. I  
25 pretty much confirmed, "okay", you know, and then

1           asked him to send it again.

2           THE COURT:   Okay.   So --

3           THE WITNESS:   He hadn't, so.

4           THE COURT:   -- asked him to send it in that same  
5 text message?   Or with an additional text message?

6           THE WITNESS:   It -- it could have been -- I --  
7 it could have been either.   I don't --

8           THE COURT:   Okay.   So he texts you.   You respond  
9 to him , "okay".   And then who texts next?   Is it  
10 you, or is it him?

11          THE WITNESS:   I think I asked him if he'd sent  
12 the email yet.   Because I still --

13          THE COURT:   Okay.

14          THE WITNESS:   -- hadn't seen anything.

15          THE COURT:   Okay.   And was that the same day  
16 that you responded "okay"?   Or was that several days  
17 later and you hadn't heard anything?

18          THE WITNESS:   I think that was -- that was  
19 definitely later.   Because I still hadn't heard  
20 anything.

21          THE COURT:   All right.   And is the extent of  
22 this text exchange between the two of you before you  
23 received the voice to text on June 8th?

24          THE WITNESS:   Pretty much.

25          THE COURT:   Okay.   So it's just a text exchange



1 regarding the -- the summit flyer, or the breakdown  
2 of who might be a part of the summit if you were  
3 going to attend?

4 THE WITNESS: Yeah -- yes.

5 THE COURT: Okay. All right. And so is that a  
6 total of a text communication of about three or four  
7 texts between the two of you?

8 THE WITNESS: Yeah, approximately, give or take.  
9 I mean, not -- not --

10 THE COURT: Okay. I'm not -- I mean --

11 THE WITNESS: It's -- I wish I -- I -- I should  
12 have it in front of me and I don't.

13 THE COURT: Okay. Well, I'm just -- I'm just  
14 trying to find out, like, I know that sometimes  
15 people do like one-word texts, and then have another  
16 text. I'm just trying to understand, like, are you  
17 texting nonstop between each other, or --

18 THE WITNESS: Oh, no.

19 THE COURT: Okay. All right. So it's  
20 approximately three to four texts. Now in any of  
21 those text messages is Ms. Luna's name ever brought  
22 up?

23 THE WITNESS: I -- I don't believe so.

24 THE COURT: Okay. So it's the subject's -- the  
25 summit -- subject of that text exchange was fairly

1 about this summit potential?

2 THE WITNESS: Yes.

3 THE COURT: Okay. All right. And so what time  
4 do you get this voice to text on the 8th?

5 THE WITNESS: On the -- the --

6 THE COURT: The first voice text.

7 THE WITNESS: Okay. Somewhere around like right  
8 before midnight.

9 THE COURT: Okay.

10 THE WITNESS: Somewhere within that --

11 THE COURT: All right. And so you get this  
12 voice to text based upon what you testified that it  
13 says, you said almost immediately you call him, and  
14 then you have about a 33-minute conversation. Is  
15 that correct?

16 THE WITNESS: Yes, Your Honor.

17 THE COURT: Okay. And then after that  
18 conversation, was there any delay between when you  
19 hung up with that conversation and when you called  
20 Anna?

21 THE WITNESS: No.

22 THE COURT: Okay. So you immediately call Anna.  
23 And how long did you and Anna speak? Approximately.  
24 I'm not asking --

25 THE WITNESS: Around 15, 20 minutes.



1 THE COURT: Okay. And then while you were in --  
2 correct me if I'm wrong. I think your testimony was  
3 that while you're in the middle of this conversation  
4 with Anna, you receive another voice to text. Is  
5 that correct?

6 THE WITNESS: Yes, Your Honor.

7 THE COURT: Okay. So that -- we'll call that  
8 "voice to text 2". Okay. And you indicated that you  
9 played a voice to text for Anna. Did you play the  
10 first voice to text to Anna, or the second voice to  
11 text to Anna, or both? I don't know. I'm just --  
12 you said that you played a voice to text to Anna.  
13 And --

14 THE WITNESS: Yeah --

15 THE COURT: -- I know there's two. So I just  
16 was trying to understand how that went.

17 THE WITNESS: Just the first one.

18 THE COURT: Okay. So you're speaking to Anna  
19 about your conversation with him, and you played her  
20 the voice to text number 1?

21 THE WITNESS: Yes, Your Honor.

22 THE COURT: Okay. And while -- once you receive  
23 that, do you receive the voice to text while you're  
24 on the phone with her? Or do you not receive the  
25 substance of that until after you hang up? I'm not

1           sure what capabilities --

2           THE WITNESS: It was actually after I hung up --

3           THE COURT: Okay.

4           THE WITNESS: -- that I realized that it was  
5           from him.

6           THE COURT: Okay. So while you were on the  
7           phone, you find out you get the beep in, or whatever  
8           they're -- a message. And then once you hang up, do  
9           you listen to the voice to text, or you call police  
10          first?

11          THE WITNESS: I listened to it.

12          THE COURT: Okay. After you listen to the voice  
13          to text, how long before you call law enforcement?

14          THE WITNESS: Immediately.

15          THE COURT: Okay. All right. After law  
16          enforcement initiates their investigation and I --  
17          I'm venturing to guess. It was after midnight, so on  
18          the 9th of June. Do you have any contact with Mr.  
19          Braddock?

20          THE WITNESS: No.

21          THE COURT: Okay. Are there any third parties  
22          that reached out to you either on behalf him, or  
23          to -- once they heard about this situation, that told  
24          you something else related to you particularly?

25          THE WITNESS: The only thing that would be

1 relevant to this is that right around the time Mr.  
2 Braddock was released from police questioning, Matt  
3 Tito called me. And I did not answer. And that was  
4 right -- that was around 6 -- 5 -- 5 or 6 p.m.

5 THE COURT: That day --

6 THE WITNESS: And then --

7 THE COURT: -- that same day, the 9th?

8 THE WITNESS: The day that Mr. Braddock was in  
9 questioning. I believe it was a -- a couple days  
10 later.

11 THE COURT: Okay.

12 THE WITNESS: And then Matt Tito called me again  
13 that evening. And then Matt Tito texted me again  
14 that next morning. And I -- and I did not answer or  
15 respond to his text messages. But as you see that,  
16 you know, he's been well invested in this case.

17 THE COURT: Okay. So the text that you received  
18 from Mr. Tito, was it on behalf of Mr. Braddock? Or  
19 was it related to Mr. Braddock?

20 THE WITNESS: I can't say that. He didn't leave  
21 any voice messages. And this text messages were  
22 that, "can you talk". But --

23 THE COURT: Okay.

24 THE WITNESS: -- he doesn't normally call me  
25 ever.

1 THE COURT: Okay. All right. And I understand  
2 that -- that -- I understand what you're saying.  
3 Okay. So there's nothing specific other than your  
4 spec -- other than your belief that it might be  
5 relating to the situation with Mr. Braddock?

6 THE WITNESS: Correct, Your Honor.

7 THE COURT: Okay. All right. And so other than  
8 the circumstances surrounding Mr. Tito reaching out  
9 to you, is there anything else -- well, I guess my  
10 other question is, you talked to Anna for 15 to 20  
11 minutes. So after 15 or 20 minutes, you immediately  
12 listen to the voice to text. And then immediately  
13 call law enforcement. Is that -- is that correct?

14 THE WITNESS: Yes.

15 THE COURT: Okay. All right.

16 THE WITNESS: Give or ta -- I mean, I -- it was  
17 all really fast. But I -- I didn't -- I didn't sit  
18 around on anything.

19 THE COURT: Okay. All right. So I think I  
20 completely understand the sequence of events now. So  
21 let me --

22 THE WITNESS: Would you mind --

23 THE COURT: -- ask Mr. Hayslett. I just -- I'm  
24 a very -- I want to know the details and be able  
25 to -- to know that. Because the -- the sequence of

1 events is actually very important in this situation.

2 So Mr. Hayslett, do you have any additional  
3 questions based upon my questions? Because I'm going  
4 to turn it over to redirect with the other --

5 MR. HAYSLETT: Yeah. I -- I -- I do --

6 THE COURT: -- the other counsel. And --

7 MR. HAYSLETT: -- I do, based upon your  
8 questions.

9 THE COURT: -- we all know --

10 MR. HAYSLETT: Yeah.

11 THE COURT: -- there's no recross.

12 MR. HAYSLETT: No --

13 THE COURT: So.

14 MR. HAYSLETT: -- and -- and -- and -- no,  
15 that's fine. I appreciate it.

16 FURTHER CROSS-EXAMINATION

17 BY MR. HAYSLETT:

18 Q Ms. Olszewski, I -- I think that you clarified  
19 some things that I didn't know. So the -- I want to make  
20 sure the -- the timing is right. Voice text number 1 you  
21 share with Ms. Luna. Is that right?

22 A Yes, sir.

23 Q And the voice text 1 occurred how many minutes  
24 before the phone call, approximately?

25 A A couple.

1 Q Okay. We'll say two or three. Phone call is 33  
2 minutes. Is that right?

3 A Yes, sir.

4 Q So now we're like 35 minutes later from that  
5 initial voice text. You call Ms. Luna, and you're on with  
6 her for -- you said, 15 to 20 minutes?

7 A Approximately. There was -- yeah. There was  
8 about -- about right, that I can remember.

9 Q After the phone call, you get voice text number  
10 2?

11 A I actually go the voice text while I was on the  
12 phone with -- with Anna.

13 Q I misunderstood you. Okay. So while you're on  
14 the phone --

15 THE COURT: I -- I think that you're confusing.  
16 She received it, but she didn't listen to it --

17 MR. HAYSLETT: Got you. Got you --

18 THE COURT: -- so you have to be --

19 MR. HAYSLETT: I -- I misunderstood --

20 THE COURT: -- careful --

21 MR. HAYSLETT: -- it.

22 THE COURT: -- about when you -- when you say --

23 MR. HAYSLETT: Okay.

24 THE COURT: -- "you got it." So --

25 Q (By Mr. Hayslett) You -- you -- re -- I got

1 you -- received it during this 35 -- 33 -- 35 -- well, 15-  
2 to 20-minute phone call. But then didn't listen to it  
3 until after you got off the phone?

4 A It wasn't a 15- to 20-minute phone call though.  
5 It was around 33, 35 minutes.

6 Q No, no, no. I'm sorry. Your phone call with  
7 Ms. Luna, how long was that? That's what I'm talking  
8 about.

9 A 15 minutes --

10 Q Okay.

11 A -- 20 minutes.

12 Q So I go the 33-minute phone call with Braddock.  
13 Immediately you call Ms. Luna for 15 to 20 minutes. Voice  
14 text comes in during that phone call. Is that right?

15 A Yes.

16 Q You listen to it afterwards. Got that right,  
17 for the first time?

18 A Yeah.

19 Q And then you called the police immediately?

20 A Yes, or close to.

21 Q How -- how long did it take before they were at  
22 your place?

23 A It was probably about an hour. I don't know.

24 Q It took an hour to get there?

25 A I -- I -- I don't remember how long it -- it

1 felt like ten years to be honest. But I -- I think it  
2 was -- I mean, it wasn't -- it wasn't too long.

3 Q Okay. I know you said you played voice text  
4 number 1 for Anna -- Anna -- Anna -- sorry, Anna, after  
5 this phone call. And you never played her voice text  
6 number 2?

7 A No.

8 Q Did you play voice text number 1 or 2 for law  
9 enforcement?

10 A They -- they received everything with -- they --  
11 they just asked for everything. So they heard it all at  
12 once. So I don't --

13 Q So -- so they -- they actually heard voice text  
14 number 1 and voice text number 2?

15 A I -- I -- all I know is I just gave everything.  
16 So I don't know what they did or didn't listen to. I just  
17 gave my statements when --

18 Q I understand.

19 A -- they got there. And they said that, you  
20 know, there are exceptions. And you didn't do anything  
21 wrong. And we'd like you to share the -- the recording  
22 with us. And so I -- I did. I -- I -- I listened to the  
23 detectives. They both gave me their cards with their  
24 email addresses. And --

25 Q Actually and -- and specifically, you played for



1 them, or gave them access to voice text number one and  
2 voice text number 2?

3 A I don't -- I didn't play anything for them that  
4 I recall, like, in house.

5 Q At any point -

6 A Which --

7 Q -- to your knowledge?

8 A I don't -- I don't remember, to be honest with  
9 you. I -- it -- I just gave them my statements. I'm not  
10 sure if I -- if I played them the -- the voice texts in --

11 Q This --

12 A -- in my house.

13 Q -- this -- I'm confused.

14 A It's literally a blur. I just felt like I -- I  
15 just felt like I was just threatened with murder. So I --  
16 it's very va -- like, it's hard for me to -- I -- I -- I  
17 know all I -- whatever I gave the law enforcement was  
18 everything that they asked for.

19 Q Well, I -- I understand.

20 A I don't --

21 Q But you -- you recall --

22 A I know I did play them the recorded video at the  
23 time.

24 Q You recall playing the voice text for Ms. Luna,  
25 correct? Voice text --

1 A Yes.

2 Q -- number 1.

3 A But --

4 Q And you do -- you recall playing voice text  
5 number 1 for Ms. Luna?

6 A Yes.

7 Q You can't recall if you ever played voice text  
8 number 1 or voice text number 2 for any law enforcement?

9 A No. I -- I can't. It was after that -- that  
10 phone call with the threats on my life and my children's  
11 life. Like, I -- I'm -- all I know is I gave my  
12 statements that they asked. I don't remember if they  
13 asked to hear that or not at all.

14 I -- I would've. I -- I don't know. Like, I -- I  
15 can't remember if I played that. It's -- it -- it --  
16 it --

17 Q Well, the -- the second voice text where you say  
18 that they threatened you and your children, obviously the  
19 most chilling one, and you're saying you may or may not  
20 have given that to law enforcement?

21 A I gave law enforcement absolutely everything --

22 Q Got you.

23 A -- that I have.

24 Q Got you. I was just looking, did -- did you  
25 reference that second voice text anywhere, do you know, in

1 your -- in you application for the injunction? I'm just  
2 trying to find any reference to this second voice text.  
3 And I can't find it anywhere. That's why I'm asking the  
4 question whether or not you shared it with them or not.  
5 Because I don't see it anywhere.

6 A Okay.

7 Q Are you positive --

8 A I don't know --

9 Q -- you gave that information to anybody?

10 A It should -- it sh -- I think it's even  
11 submitted court, if I'm not -- if I'm not --

12 Q The -- the voice text is?

13 A I -- I do believe so. I would have to ask my --

14 Q Okay.

15 A -- attorney, but.

16 Q Okay.

17 A But I -- I can submit it if it's not submitted.

18 If that's something that the -- the judge would allow.

19 Q You -- you still have the --

20 A I --

21 Q -- voice text?

22 A Yes, I do.

23 Q This is where I'm confused. I -- I -- I thought  
24 you said that voice texts don't save. Maybe I  
25 misunderstood this, and I'm -- I'm imagining this. I

1 thought you said you can't save a voice text.

2 A I screen recorded all of the voice texts. And  
3 that's actually not -- not against the law.

4 Q Okay. Well, I -- I -- I understand you got a  
5 good understanding what is and what isn't against the law.  
6 But -- but you screenshotted both voice text number 1 and  
7 voice text number 2?

8 A Yes, sir.

9 Q And you can actually listen to it and hear it?

10 A Yes, sir.

11 Q Okay.

12 MR. HAYSLETT: Great. Nothing else, Your  
13 Honor.

14 THE COURT: All right. I will start by turning  
15 it -- I don't know who wants to go first, Mr.  
16 Perlman, or Ms. Janes?

17 MR. PERLMAN: Judge -- Judge, real -- real  
18 quick.

19 THE COURT: Um-hum.

20 MR. PERLMAN: As -- as embarrassing as this may  
21 sound, I went off camera so the Court wouldn't see me  
22 pacing. But I am desperately asking for a five  
23 minute restroom break.

24 THE COURT: That's fine. Let me just ask one  
25 question. I do have a printout of exhibits. I

1 haven't looked through them. Because I would never  
2 look through an exhibit until it's moved into  
3 evidence.

4 Other than these physical exhibits that I have  
5 here, is there any electronic exhibits that I should  
6 be expecting? Because I just want to make sure if  
7 there is, that I actually have them before we get to  
8 there.

9 MR. HAYSLETT: I was going to ask the same  
10 question.

11 MR. PERLMAN: Not -- not -- not from us, Judge.

12 THE COURT: Okay. All right. So I just wanted  
13 to double check before we got back, because we have  
14 some time to discuss that.

15 So five minutes. Is that enough? Mr. Hayslett,  
16 you're going to have to speed walk to the  
17 cafeteria.

18 MR. HAYSLETT: Yeah -- yeah. I'll -- I'll walk  
19 fast, Judge.

20 THE COURT: Okay. All right. So we'll see you  
21 ba -- everybody back let's see, I guess, in about  
22 five minutes. So I'll give everybody eight minutes.  
23 So 2:15.

24 MR. PERLMAN: Thank you, Judge.

25 THE COURT: All right. And then we'll reconvene

1 with redirect. All right.

2 THE BAILIFF: All rise. Court is in recess  
3 until (unintelligible).

4 (Recess.)

5 (Proceedings continued in next volume.)

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