

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 II

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  
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1 (Proceedings continued from previous volume.)

2 THE COURT: Know what? He probably can't hear  
3 me. Now -- now you'll be able to hear me. All  
4 right. Let me ask -- Mr. Perlman, are you there?

5 MR. PERLMAN: I just am, Judge, and thank you  
6 very, very much.

7 THE COURT: Yeah. All right. Mr. Braddock, can  
8 you hear us? Ms. Luna?

9 THE PETITIONER: Yes, ma'am, I'm here.

10 THE COURT: Okay. Good. I just don't want to  
11 start the hearing without all parties being present.  
12 And Mr. Braddock, you're going to have to unmute  
13 yourself. Are you still there?

14 THE RESPONDENT: Yes, ma'am. Yes, I am. Yes,  
15 Your Honor.

16 THE COURT: All right. Perfect. I just wanted  
17 to double-check before we started the remainder of  
18 the hearing.

19 Let me see. I thought I thought of one  
20 question. That's what happens when you take a break,  
21 so. Nope, I think that we're done. All right. So I  
22 think we are at either Ms. Janes or Mr. Perlman, I'm  
23 not -- who was -- whoever wants to start with  
24 redirect?

25 MS. JANES: I believe Mr. Perlman was going to

1 start with redirect and then I'll wrap up.

2 THE COURT: Okay.

3 MR. PERLMAN: Go ahead. I don't mind.

4 MS. JANES: Ms. Olszewski, I think you're on  
5 mute.

6 THE COURT: Oh, yes. Sorry about that. All  
7 right. And that will bring us to --

8 REDIRECT EXAMINATION

9 BY MS. JANES:

10 Q So, Ms. Olszewski, just to be clear, 'cause  
11 there's been mention of the threatening call with Mr.  
12 Braddock having been recorded, is your testimony here  
13 based on your independent recollection of your phone  
14 conversation with Mr. Braddock?

15 A Yes.

16 Q Okay. There's also been discussion about  
17 whether some of Mr. Braddock's threats to you and to Ms.  
18 Luna may have been what's been called conditional. Are --  
19 are you aware of any legitimate purpose for which Mr.  
20 Braddock should be able to threaten Ms. Luna's life if she  
21 were to get ahead in the polls?

22 A No, not at all.

23 Q Are you aware of any legitimate purpose for Mr.  
24 Braddock to threaten your life if you were near Ms. Luna  
25 or -- or associated with her?

1           A     No.

2           Q     Did the emotional distress that you felt --  
3 was -- was the -- was the degree of emotional distress you  
4 felt at Mr. Braddock's threats on the threatening phone  
5 call affected by wondering whether Ms. Luna would get  
6 ahead in the polls?

7           A     Was -- yeah, of course.

8           Q     I mean, did -- I -- I guess let me rephrase  
9 that. Did you feel substantial emotional distress  
10 regardless of whether Mr. Braddock's threats were somehow  
11 conditional, or at least some of them? Was that -- was  
12 that emotional distress something you felt regardless?

13          A     Yes, and in general, I feel distressed just  
14 knowing that there's somebody out there willing to murder  
15 another person despite the reason.

16          Q     And -- and did you feel like that threat to you  
17 was a real threat -- meaning you felt your life was in  
18 danger?

19          A     Yeah. Yes, I -- and I -- I sent my kids away  
20 for the summer out of state. I didn't even -- I lost that  
21 time with them, you know? I -- I -- I -- I don't know else  
22 to -- to -- put it, you know? I don't know how much -- I  
23 don't know how much more I -- I could have done -- you  
24 know -- to protect them, you know? And I -- and I lost  
25 that -- I lost that time with them, and I -- it's --

1 it's -- it's awful. It's just -- it's a really bad  
2 situation right now.

3 Q And now I'm going to want to talk about the  
4 separate voice text that Mr. Braddock sent you. Did  
5 you -- again, was there -- was there any legitimate  
6 purpose for Mr. Braddock to again separately threaten your  
7 life if you were to reveal what he had said to you?  
8 Can -- Ms. Olszewski, I'm sorry, we -- I -- I can't -- I  
9 can't hear you.

10 A My internet is -- it says it's unstable, but  
11 I -- I heard part of the question. I didn't hear the  
12 whole thing though.

13 Q Okay. I'm -- I -- I was able to hear that, so  
14 I'm going to go ahead and repeat my question.

15 A Okay.

16 Q If you have trouble hearing it, just say so  
17 again, please, okay?

18 A Okay.

19 Q Okay. So I was asking about the separate voice  
20 text that took place later the same night as the  
21 threatening phone call. Did you again experience  
22 substantial emotional distress when Mr. Braddock  
23 threatened you if you should reveal what he had said?

24 A Yeah. I just took that as, like, he was just  
25 doubling down on -- on what he told me in the phone call.



1 And for me, he had time to think about that and then  
2 essentially -- you know -- tell me not to say anything or  
3 else -- you know -- and that is -- that was scary.

4 Q Do you feel like anything that has happened here  
5 today in the course of this hearing has felt threatening  
6 to you?

7 A Yeah, when I was testifying to a very important  
8 part of -- of -- you know -- this -- what happened, and --  
9 and Mr. Braddock got on camera and -- and flashed his --  
10 his t-shirt, and looked very angry. That -- that just  
11 kind of shows how he is. And that in itself -- that's --  
12 it's -- it just shows that he doesn't even care. So why  
13 was he going to care about -- especially now that I -- I  
14 did say something that he warned me not to do, then now  
15 what?

16 Q Thank you.

17 MS. JANES: Your Honor, I'll go ahead and turn  
18 it over to Mr. Perlman.

19 THE COURT: Okay. You may inquire, Mr. Perlman.

20 MR. PERLMAN: Thank you, Judge.

21 REDIRECT EXAMINATION

22 BY MR. PERLMAN:

23 Q I just want to clarify my understanding of your  
24 testimony. Is it correct that as a result of these  
25 multiple communications on the late evening of June 8th,

1 you contacted the police and/or authorities because you  
2 were fearful of your life, as well as Ms. Luna's?

3 MR. HAYSLETT: Judge, this is leading, Judge.

4 A Yes.

5 THE COURT: Oh.

6 MR. HAYSLETT: Still direct, I believe.

7 THE COURT: All right. State that -- can you  
8 state the question again that she called the police?

9 'Cause, she --

10 Q (By Mr. Perlman) Yeah. Did -- did -- did you  
11 contact the authorities immediately after the two separate  
12 communications with Mr. Braddock on the evening of June  
13 8th because you were fearful of your life and that of Ms.  
14 Luna?

15 THE COURT: Okay. I'll overrule the --

16 MR. HAYSLETT: Judge, he's still leading, Judge.

17 THE COURT: -- the leading objection and --

18 A And yes.

19 MR. PERLMAN: Thank you. That's it.

20 THE COURT: That's the only question you had,  
21 sir?

22 MR. PERLMAN: Yes.

23 THE COURT: Okay. All right. Anybody else have  
24 any additional questions, or may this witness be --  
25 may we call the next witness?

1 MR. HAYSLETT: Judge, the only thing I -- I  
2 would say is -- I -- I don't want to release her --

3 THE COURT: But she's --

4 MR. HAYSLETT: I wasn't aware that she had  
5 recorded both voice texts and at some point, either  
6 now or later, I'm going to ask her to play those for  
7 you, since I didn't realize she had them in  
8 possession. I wasn't aware of it until tonight -- or  
9 today, rather -- it feels like tonight -- that she  
10 had those voice texts recorded. It was my  
11 understanding the only recorded phone was the one  
12 that was illegal. She now shared with us that she  
13 has those --

14 THE COURT: Uh-huh.

15 MR. HAYSLETT: -- and I'd like her to play those  
16 so we'd have the complete version of what was -- my  
17 client said to her that night, both voice text 1 and  
18 voice text 2.

19 THE COURT: All right. So --

20 THE PETITIONER: May I say something, Your  
21 Honor?

22 THE COURT: That's up to your attorneys, I  
23 guess.

24 MR. PERLMAN: No.

25 THE PETITIONER: Sorry.

1 THE COURT: So -- I mean, we can have a  
2 discussion about these voice texts. One, it's either  
3 an argument for -- for closings or -- or  
4 presumption -- but if -- if you're going to call her  
5 as a witness --

6 MR. HAYSLETT: I was going -- that's when you  
7 said you were going to excuse her, I wanted to --

8 THE COURT: -- and ask her. I'm not going to  
9 excuse her as a witness.

10 MR. HAYSLETT: That's what I meant. When you  
11 said --

12 THE COURT: I just meant, release her from the  
13 stand.

14 MR. HAYSLETT: Got you, got you, got you.

15 THE COURT: She's still a party to the case,  
16 and --

17 MR. HAYSLETT: Got you.

18 THE COURT: -- and an important witness.

19 MR. HAYSLETT: Then I'll -- then I'll wait till  
20 my case-in-chief, Judge.

21 THE COURT: Okay. If you so choose to even --  
22 all right -- to even call her. I don't know, and  
23 then I don't --

24 MS. JANES: I --

25 THE COURT: -- and then we'll have a discussion

1 about that. I would like to get through some of the  
2 other witnesses, if possible, that have been waiting  
3 since 10 a.m. I don't know if Ms. Luna's going to be  
4 the next witness or if we could potentially get some  
5 of those other parties that are -- have been  
6 patiently waiting since 10, and handle them, 'cause  
7 based upon what I've heard, maybe they are more brief  
8 witnesses.

9 MR. PERLMAN: I -- I think that's correct,  
10 Judge, and I think that's how we should proceed.

11 THE COURT: Okay. So Mr. Perlman or Ms.  
12 Janes -- or Ms. Janes, sorry -- call your next  
13 witness.

14 MS. JANES: It's Ms. Janes. Mr. Perlman is  
15 going to call the next witness.

16 THE COURT: Okay. Mr. Perlman.

17 MR. PERLMAN: Thank you, Judge. We would call  
18 Mr. DeMint.

19 THE COURT: All right. Let me get him in. I'm  
20 not sure whether all -- all right. I've admitted him  
21 into our room, so I just need to -- maybe somebody  
22 can send him a message to get to his computer? I can  
23 imagine some of these parties may have stepped away  
24 briefly.

25 MR. PERLMAN: Certainly, Judge. I will.

1 THE COURT: Yep. Oh, I see him here. All  
2 right. Mr. DeMint, if you could turn your camera on  
3 and -- oh, hold on. Oh, there you are. All right.  
4 And just unmute yourself, sir.

5 MR. DEMINT: Hello. How you doing?

6 THE COURT: Good. All right. We are ready for  
7 you. Sir, can you raise your right hand?

8 THEREUPON,

9 BRADLEY DEMINT,

10 the witness herein, having been duly sworn, was examined  
11 and testified as follows:

12 MR. DEMINT: Yes.

13 THE COURT: Okay. All right. You can put your  
14 hand down. Mr. Perlman, you may inquire.

15 MR. PERLMAN: Thank you.

16 DIRECT EXAMINATION

17 BY MR. PERLMAN:

18 Q Can you please state your name for the record?

19 A Yeah. Bradley DeMint.

20 Q Okay. And Mr. DeMint, thank you for your  
21 patience this morning. These things sometimes take  
22 longer, but everyone's trying to do what they can. Can  
23 you explain to the Court how you know Mr. Braddock?

24 A Yeah, yeah. I -- I don't really know him, but I  
25 met him at an event. It was just a political event --

1 local political event. And I met him and he added me on  
2 Facebook, and -- but that's -- that's how I met him, was  
3 at a political event.

4 Q And have you ever spoken to him on the phone or  
5 communicated to him via text or messaging?

6 A On the messages that he sent to me that day that  
7 I sent to you guys, that was the only time that we ever  
8 interacted. I never talked to him on the phone, but  
9 through direct messages on Facebook.

10 Q Okay. And do you know Ms. Luna?

11 A Yes, I do.

12 Q And how do you know her?

13 A I know her because she ran for Congress in my  
14 district, and I've supported her and -- and her campaign.

15 Q Did you have a communication with Mr. Braddock  
16 on or about May 30 of 2021?

17 A Yeah, I -- let me just check really quick, but I  
18 think that's the day that he texted me the message where  
19 he said he was going to take out Anna -- or take out Luna.  
20 If you give me one second and I'll make sure that that was  
21 May 30th, though. So -- yeah, that -- that was May 30th.  
22 Yep. On May 30th he texted me that.

23 Q Okay.

24 MR. PERLMAN: I'm going to put on the screen,  
25 Judge, what's been marked as Exhibit 6 and see if the

1 witness can identify this message exchange between  
2 himself and Mr. Braddock.

3 Q Mr. DeMint, can you see what's on the screen at  
4 this time?

5 A Yes, I can. Those are the messages that he sent  
6 me.

7 Q Okay. And this is between you and Mr. Braddock,  
8 correct?

9 A Yes.

10 Q Okay. And this is a screenshot from your phone,  
11 yes?

12 A Yes, it is.

13 Q And is it your response in the blue highlight?

14 A Yes.

15 Q Okay. And everything else is Mr. Braddock's --

16 A Yep.

17 Q -- authorship, yes?

18 A Yes, it is.

19 Q Okay. So there's a response in the middle in  
20 blue, and beneath that it says I'm fully aware. Can you  
21 read the very next sentence that Mr. Braddock shared with  
22 you at this time?

23 THE COURT: Wait, hold on.

24 A Yep.

25 THE COURT: All right. Can I just interrupt



1 here? Are you moving these into evidence before  
2 we're publishing them?

3 MR. PERLMAN: Yes, Judge.

4 THE COURT: Okay. Mr. -- and which Exhibit is  
5 this?

6 MR. PERLMAN: Six.

7 THE COURT: Okay. Any objections to the Exhibit  
8 6, Mr. Hayslett?

9 MR. HAYSLETT: Yeah, Judge. I'm objection --  
10 it's hearsay. Also object as to foundation.

11 MR. PERLMAN: Couple responses.

12 THE COURT: Okay.

13 MR. PERLMAN: I -- I'm not sure that it's  
14 hearsay. It may actually be non-hearsay, I don't  
15 think, based on the harassment statute, that it needs  
16 to come in for the truth of the matter asserted.

17 THE COURT: Okay.

18 MR. PERLMAN: Regardless, I would say based on  
19 the harassment statute, it is an admission against  
20 interest or a statement against interest. And  
21 separate and apart from that, I don't even know if it  
22 comes in as hearsay because it's a photograph and I  
23 can move it in by asking the witness if it's an  
24 accurate depiction of what it purports to represent,  
25 which is a screenshot of an exchange on messages

1           between himself and Mr. Braddock.

2           THE COURT: Okay. I do think that that's the  
3           predicate question to be asking for this evidence,  
4           which potentially is the objection from Mr. Hayslett.  
5           So I will allow you to ask the further predicate  
6           question, and then I'll ask Mr. Hayslett if he has  
7           any additional objection.

8           MR. PERLMAN: Thank you.

9           Q        (By Mr. Perlman) Mr. DeMint, did you take the  
10          screenshot of this message that's on Exhibit 6?

11          A        Yes, I did.

12          Q        And is it an accurate depiction of what it  
13          purports to represent?

14          A        Yes.

15          MR. PERLMAN: I would move that in, Judge, as a  
16          photograph.

17          THE COURT: Okay. Any objection, Mr. Hayslett?

18          MR. HAYSLETT: I just had a standing objection,  
19          based on what I said before, Judge.

20          THE COURT: Okay. I am going to allow it into  
21          evidence. It -- I don't believe it is being offered  
22          for the truth of the matter asserted. I think  
23          it's -- it is part of the sequence of events, and  
24          it's not based upon this personal opinion of the  
25          witness. It -- it's based upon what happens after

1           that.  And then, Mr. Hayslett, if you don't mind  
2           putting your mask back on.

3           MR. HAYSLETT:  Oh, sorry.  Sorry, Judge.

4           THE COURT:  I don't want to get in trouble with  
5           the Supreme Court.

6           MR. HAYSLETT:  I don't want to get you in  
7           trouble here, Judge.

8           THE COURT:  All right.  I will move it into  
9           evidence as Petitioner's Exhibit 6.  You may inquire.

10          MR. PERLMAN:  Certainly.

11          Q        (By Mr. Perlman)  Mr. DeMint, can you read aloud  
12          the -- the three -- three sections after your blue  
13          highlighted response?

14          A        Yeah.  So he said, "I'm fully aware myself and  
15          other candidates and my team will take out Luna, no  
16          questions asked.  That dumb cunt doesn't deserve to be in  
17          Congress."  And then he sent another picture of -- down  
18          there.

19          Q        Okay.  And did you perceive this to be  
20          threatening for Ms. Luna?

21          A        I did, yes.  I -- I mean, that's something that  
22          is -- is definitely not something a normal person would  
23          say.

24          Q        Right.  And when I say threatening, I don't mean  
25          in the political sense, I mean physical harm, correct?

1 A Yes. That's what it sounds like.

2 Q And as a result, did you warn Ms. Luna about  
3 this communication?

4 A So I -- I did, yes. I -- I sent that to her.

5 Q And did you warn her because you were concerned  
6 for her safety and well-being?

7 A Yes.

8 MR. PERLMAN: That's all I have for this  
9 witness, Judge.

10 THE COURT: Okay. Ms. Janes, any -- any direct  
11 examination?

12 MS. JANES: No, Your Honor.

13 THE COURT: Okay. And Mr. Hayslett, any cross-  
14 examination?

15 MR. HAYSLETT: Yeah. Briefly, Judge.

16 THE COURT: All right.

17 CROSS-EXAMINATION

18 BY MR. HAYSLETT:

19 Q Mr. DeMint, when you were put on notice that  
20 allegedly Mr. Braddock and the other candidates and his  
21 team were going to take out Ms. Luna, did you call law  
22 enforcement?

23 A No, I did not. I didn't think at first -- I  
24 thought really he just wanted attention. And then I  
25 realized that that was more serious, and that was when

1 I -- I contacted Luna directly, because I -- I figured  
2 that would be the best decision.

3 Q Did you explain -- you contact Ms. Luna  
4 directly?

5 A Yes, I -- I -- I sent it to her.

6 Q Did you explain to her that -- that you believe  
7 Mr. Braddock and the other candidates were working  
8 together to take her out?

9 A Yes. I -- and that's what the message says --

10 Q Sure.

11 A -- so that's -- that's what I -- I contacted her  
12 and I wanted to make sure that she saw that.

13 Q And I assume you -- you took that on face value,  
14 that Mr. Braddock and the other candidates running for  
15 Congress wanted to do Ms. Luna physical harm?

16 A Yeah, I mean, when they say they want to take  
17 somebody out, that's -- that's what it sounds like.

18 Q It had to be very disturbing to think that you  
19 have three or four candidates working in concert with a  
20 team to take another person out?

21 A Yes.

22 Q Got you. And I -- and I said, other than Ms.  
23 Luna, were you so concerned that you ever called law  
24 enforcement? I think you said, yeah, you didn't, just Ms.  
25 Luna; is that right?

1           A     Yeah, I didn't. I -- I wanted the rest of that  
2 to be handled. At that time, I -- I saw that -- you  
3 know -- there were already -- there's a whole article  
4 about what was happening and stuff like that, so I -- I  
5 knew that there was -- you know -- other -- I wanted to  
6 make sure that she knew it and it wasn't going to somebody  
7 without telling her.

8           Q     Got you.

9           MR. HAYSLETT: No other questions, Judge.

10          THE COURT: All right. I do have one question.  
11 When did you send it to Ms. Luna?

12          THE WITNESS: That was on -- I looked at it --  
13 that was June 19th, so --

14          THE COURT: Okay.

15          THE WITNESS: -- it was -- it was after that.

16          MR. HAYSLETT: Judge, just a -- can I have a  
17 quick follow-up to your question?

18          THE COURT: Sure.

19          Q     (By Mr. Hayslett) Did -- did -- did Mr.  
20 Braddock ask you to send this to Ms. Luna?

21          A     No.

22          Q     Did he direct you to send it to her?

23          A     No, I -- I didn't even respond to him when he  
24 sent that back to me -- when he sent that message.

25          Q     Got you. Got you.

1 MR. HAYSLETT: No other questions, Judge.

2 THE COURT: Okay. Any redirect, Mr. Perlman?

3 MR. PERLMAN: No, thank you.

4 THE COURT: All right. Ms. Janes?

5 MS. JANES: No, Your Honor. Thank you.

6 THE COURT: Okay. All right. May this witness  
7 be released and excused at this time? Anybody?

8 MR. PERLMAN: We would say yes.

9 THE COURT: Okay. Mr. --

10 MR. HAYSLETT: No objection, Judge.

11 THE COURT: All right. I am going to release  
12 you. Sir, you are finished. I'm just going to  
13 remove you from the meeting so that you can go about  
14 your day.

15 MR. PERLMAN: Thank you, Mr. DeMint.

16 THE COURT: Thank you for your patience. All  
17 right. He is removed. Mr. Perlman, your next  
18 witness?

19 MR. PERLMAN: Mr. Mackwell.

20 THE COURT: Okay. All right. Mr. Mackwell.  
21 All right. Can somebody just let him know we're  
22 ready for him, if you don't mind?

23 MR. PERLMAN: Yeah. Give me a minute, Judge.

24 THE COURT: No problem. It's easy when they're  
25 all out in the hallway, we just bring them in. New

1 technology.

2 MR. PERLMAN: Okay. He found it, Judge. He  
3 accidentally joined a different proceeding.

4 THE COURT: Oh, yeah. Yeah. Oh, I think maybe  
5 into Judge Nage's (phonetic) thing. He has to kind  
6 of go --

7 MR. PERLMAN: Yeah, yeah, yeah.

8 THE COURT: -- from one --

9 MR. PERLMAN: It sounds like -- it sounds like  
10 Ms. Chase (phonetic), so maybe.

11 THE COURT: -- from one to the other, it's --  
12 there's no perfect way to do this -- or at least I  
13 have yet to find it. I'm going to try to move him to  
14 another room and then move him back to see if that  
15 kind of sparks the prompt. Just making sure I can  
16 get him. All right. I'm going to move him back in.  
17 He was able to get in, so. If he just accepts -- oh,  
18 I see he reached that one. All right. Perfect.

19 Hi, Mr. Mackwell.

20 MR. MACKWELL: Hi. Okay.

21 THE COURT: You're good. All right. Mr.  
22 Mackwell, can you please raise your right hand?

23 THEREUPON,

24 ARTHUR MACKWELL,

25 the witness herein, having been duly sworn, was examined



1 and testified as follows:

2 MR. MACKWELL: I do.

3 THE COURT: All right. You can put your hand  
4 down. Mr. Perlman, you may inquire.

5 MR. PERLMAN: Thank you.

6 DIRECT EXAMINATION

7 BY MR. PERLMAN:

8 Q Mr. Mackwell, can you hear us okay?

9 A Yeah. Let me just turn it up for a second here.  
10 I had it down 'cause I was in the wrong courtroom there  
11 for a minute. All right. There. Go ahead.

12 Q Can you hear everyone okay?

13 A Yes, I can.

14 Q Okay. Can you please state your full name for  
15 the record?

16 A Arthur David Mackwell.

17 Q Okay. And do you know a William Braddock, the  
18 respondent?

19 A Yes.

20 Q And how do you know him?

21 A I know him from a number of Republican meetings,  
22 the executive committee, and -- and other places. Just  
23 events.

24 Q Have you ever conversed with him in person or  
25 via telephone?

1           A     I have conversed with him in person.

2           Q     Okay.  And was that in 2021?

3           A     Yes, it was.

4           Q     Okay.  And do you know Ms. Luna?

5           A     Yes, I do.

6           Q     And how do you know her?

7           A     Running for Congressional office, I --

8 Congressional office, and I volunteer for her campaign.

9           Q     Okay.  Did there come a time in the end of May  
10 or June in which you spoke with Mr. Braddock?

11          A     Yeah.  I -- I spoke with him on a number of  
12 times.  I first met him at the Pinellas County Republican  
13 Executive Committee, told me he was running for Congress.  
14 I said good luck.  I saw him again a couple times after  
15 that.  At the events, I probably -- you know -- at least a  
16 half a dozen times I've spoken with him.

17          Q     Do you have an recollection of a conversation  
18 you had with -- with him on or around May 15 of 2021?

19          A     I do.

20          Q     And was Ms. -- and was Ms. Luna discussed at  
21 that time?

22          A     Yes.

23          Q     And what did Mr. Braddock tell you with regard  
24 to Ms. Luna on May 15th?

25          A     Well, basically, he -- he told me -- you know --

1 that he had been looking at her house -- I don't know --  
2 the comings and goings from her house. And -- you know --  
3 about men coming and going from there, and such -- you  
4 know -- basically along those lines. You know, I -- I  
5 can't repeat it verbatim.

6 Q Did -- did you take that discussion from him to  
7 me that he was surveying her home?

8 A Yes. I -- I didn't realize it at the time, but  
9 later I realized that's exactly what he was doing.

10 Q And he was commenting on the comings and goings  
11 at her private residence, yes?

12 A Yes.

13 Q And have you ever had the discussion with anyone  
14 else regarding Ms. Luna's residence, other than Mr.  
15 Braddock?

16 A Yourself, Anna, but not until quite some time  
17 later.

18 Q And did you find this discussion somewhat  
19 concerning or -- or beyond that, in terms of --

20 A Yeah, I was very concerned. A little  
21 disgusting, as a matter of fact.

22 Q And did you relay this information to Ms. Luna?

23 A Yes, I did.

24 Q And did you call her? How did you relay it?

25 A Well, basically, I -- I saw Grace (phonetic) and

1 then someone mentioned something about it to Grace, and  
2 then Anna called me the next day, and I told her what was  
3 going on with the guy. You know -- I -- I -- I really  
4 thought I should have said something sooner, but I didn't.

5 Q And that's because you were concerned with her  
6 safety and well-being, correct?

7 A That's correct. I -- you know -- at the time,  
8 I -- it should have hit me at the time, but it didn't.

9 Q But when it did, you wanted to warn Ms. Luna,  
10 correct?

11 A Yes, that's correct.

12 Q Okay.

13 MR. PERLMAN: That's all -- I don't know if Ms.  
14 Janes has any questions.

15 MS. JANES: I have no questions for this  
16 witness. Thank you.

17 THE COURT: All right. Thank you. When did you  
18 tell Ms. Luna about this statement?

19 THE WITNESS: Right -- very shortly after  
20 this -- this case was continued. I -- I looked it up  
21 to see what was going on -- you know -- what the --  
22 the court case was. At that point I saw it was a --  
23 a stalking case, and that's when it kind of hit me  
24 that -- that I -- you know -- that that's what he was  
25 going. I didn't really realize it at the time. But

1 not long after the -- after this case had been  
2 postponed, because I looked it up in the court  
3 records.

4 THE COURT: Okay. Mr. Hayslett, any --

5 MR. HAYSLETT: Sure.

6 THE COURT: -- cross-examination?

7 MR. HAYSLETT: Yeah.

8 CROSS-EXAMINATION

9 BY MR. HAYSLETT:

10 Q Did he indicate which house -- which home that  
11 was -- where it was located?

12 A What was the question?

13 Q Did he indicate where the house was located?

14 A He said downtown St. Pete.

15 Q Any more -- any more specific than that?

16 A Well, he did -- he said it was across the street  
17 from Popeyes.

18 Q Okay. Did he say where he was located --  
19 whether it was done audio -- whether he was doing it  
20 through video, whether he was in person, whether it was  
21 recorded? Whether he got the information --

22 A He didn't mention it, no.

23 Q Did he mention whether he did it personally or  
24 had an investigator do it?

25 A He -- from our conversation, it seemed that it

1 was him.

2 Q Okay. At that point, was he a candidate for  
3 U.S. Congress?

4 A No. I -- he said he was going to announce on  
5 July 4th.

6 Q Okay.

7 A He -- but he had indicated that he was going to  
8 be doing that.

9 Q Got you. Did he ever threatened (sic) her to  
10 you?

11 A No.

12 Q Did he ever tell you not to tell her?

13 A No.

14 Q Did he ever tell you to tell her?

15 A No.

16 Q And you said you worked on Ms. Luna's last  
17 campaign?

18 A Volunteer, yes.

19 Q And you're working on this campaign?

20 A I will be volunteering, yes.

21 Q Okay.

22 MR. HAYSLETT: No other question, Judge.

23 THE COURT: All right. Any redirect Mr.  
24 Perlman?

25 MR. PERLMAN: No, thank you.

1 THE COURT: Ms. Janes?

2 MS. JANES: No, Your Honor.

3 THE COURT: All right. May this witness be  
4 released?

5 MR. HAYSLETT: I have no objection, Judge.

6 THE COURT: All right.

7 MR. PERLMAN: No, Judge.

8 MS. JANES: Yes, Your Honor.

9 THE COURT: All right. Thank you for your  
10 patience Mr. Mackwell. We are finished and I'm going  
11 to remove you from the hearing at this time, okay?

12 THE WITNESS: Okay. I'm free to go then, right?

13 THE COURT: Yes, you are. Have a good day, sir.

14 THE WITNESS: You have a good day, too. Thank  
15 you.

16 THE COURT: Thank you. All right. Mr. Perlman,  
17 your next witness?

18 MR. PERLMAN: Thank you, Judge. We would call  
19 Audra Christian.

20 THE COURT: All right.

21 MR. PERLMAN: I think she may have gone in the  
22 wrong one, too. Give me a second.

23 THE COURT: That's okay.

24 MR. PERLMAN: Okay.

25 THE COURT: Do you have any contact with her?

1 Just ask her to rejoin, 'cause I kept trying to admit  
2 her, and it was --

3 MR. PERLMAN: No, it --

4 THE COURT: -- it wouldn't work.

5 MR. PERLMAN: -- it's not -- the host removed me  
6 from the meeting.

7 THE COURT: All right. So can she just rejoin?

8 MR. PERLMAN: Sure.

9 THE COURT: Because I was trying to have her  
10 join, and it wasn't connecting. It wasn't processing  
11 at all.

12 MR. PERLMAN: When -- when you say rejoin, do  
13 you mean on the Zoom, or --

14 THE COURT: Yeah, just click back on the Zoom  
15 link.

16 MR. PERLMAN: You sound like a pro.

17 THE COURT: I have a little experience in Zoom  
18 thanks to COVID.

19 MR. PERLMAN: You know what? I think that part  
20 of this is here to stay. At least for motion  
21 calendars, right?

22 THE COURT: I think that it'll be interesting to  
23 see how this reshapes the system -- judicial system  
24 or the court system.

25 THE COURT: All right. That's my noise. All



1 right. We have progress. All right.

2 Hi, Ms. Christian. If you could please enable  
3 your camera. I see you have unmuted yourself. All  
4 right. There you are. All right. Ms. Christian,  
5 can you raise your right hand?

6 (No audible response.)

7 THE COURT: All right. You have to answer out  
8 loud. All right. Hang on.

9 MR. PERLMAN: Can you check -- can you check  
10 your volume?

11 THE COURT: Let's see if she still -- yeah, it  
12 should be connected.

13 MR. PERLMAN: No, Ms. Christian, maybe check the  
14 volume on your computer device.

15 THE COURT: It does show that her audio is  
16 connected, but we cannot hear you, ma'am. So let  
17 me -- yeah, it's not working. It might be your  
18 microphone. If you go down by the mute section,  
19 there's a little, like, upward-facing V that if you  
20 look at some of those microphone options --

21 MS. CHRISTIAN: Now can you hear me?

22 THE COURT: Yes.

23 MR. PERLMAN: Uh-huh.

24 MS. CHRISTIAN: Okay. All right. There we go.

25 THE COURT: I don't -- I do have a little IT in

1 me. All right. Mr. --

2 THEREUPON,

3 AUDRA CHRISTIAN,

4 the witness herein, having been duly sworn, was examined  
5 and testified as follows:

6 MS. CHRISTIAN: Yes, ma'am.

7 THE COURT: Okay. Mr. Perlman, you may inquire.

8 MR. PERLMAN: Thank you.

9 DIRECT EXAMINATION

10 BY MR. PERLMAN:

11 Q Ms. Christian, can you please state your full  
12 name for the record?

13 A It is Audra Christian.

14 Q Okay. And let me first thank you for your  
15 patience today. We've been trying to move this along, but  
16 it takes a while, so thank you so much for being  
17 available.

18 A Thank you.

19 Q Do you know Mr. William Braddock, the respondent  
20 in this case?

21 A Yes, I do.

22 Q Okay. And how do you know him?

23 A He was coming to our group events, and that's  
24 where I met him at.

25 Q Okay. And is that the Community Patriot

1 Pinellas Group?

2 A Yes. Uh-huh.

3 Q Okay. And is that a private organization?

4 A Yes, it is.

5 Q Okay. And have you ever spoken or communicated  
6 with him via direct messaging?

7 A Yes, I have.

8 Q Both, or just the messaging?

9 A Direct messaging, texting, and we've talked on  
10 the phone a few times.

11 Q Okay. And do you know the petitioner, Ms. Luna?

12 A Yes.

13 Q Okay. And how do you know her?

14 A My daughter worked on her campaign a long time  
15 ago, and she's somebody who's running for office in  
16 Pinellas County.

17 Q All right.

18 MR. PERLMAN: Judge, with regard to Ms.  
19 Christian, I propose moving into evidence Exhibits  
20 pre-marked 1 through 5, and would ask the witness the  
21 same question as to each one if I could put them up?

22 THE COURT: Okay.

23 MR. PERLMAN: We can start with Exhibit --

24 THE COURT: No, hold on. Let me just ask Mr.  
25 Hayslett, do you have any objection to those?

1 MR. HAYSLETT: Judge, I object to the same  
2 issue --

3 THE COURT: Okay.

4 MR. HAYSLETT: -- number one would be hearsay,  
5 number two, improper foundation as up to this point.

6 THE COURT: Okay. All right. I just wanted to  
7 ask before he started asking the predicate questions  
8 if you had any objections to streamline things.  
9 But -- all right. You go ahead. You may inquire.  
10 And you may share whatever screen.

11 MR. PERLMAN: Thank you. I'm going to put on  
12 Exhibit 1.

13 Q (By Mr. Perlman) Ms. Christian, is -- is this a  
14 message between you and Mr. Braddock from May 14th, 2021?

15 A Yes, it is.

16 Q Okay. And is this a screenshot photo of the  
17 messages that you took on your cell phone?

18 A Yes.

19 Q And does this picture accurately depict -- is it  
20 an accurate depiction of what it purports to represent?

21 A Yes. Nothing's been altered.

22 Q Okay. Judge, I would move in Exhibit 1.

23 THE COURT: Okay. Any objection, Mr. Hayslett?

24 MR. HAYSLETT: Judge, is it -- is this -- is  
25 this -- is this text or this Facebook messaging?

1 MR. PERLMAN: This is a direct message.

2 MR. HAYSLETT: The only thing I'd say -- if  
3 we're going to put the -- the statements in from Mr.  
4 Braddock, I -- to her, I don't have a question -- I'd  
5 just have her put in all the messages back and forth.  
6 And for the doctrine of completeness, I'd like the --  
7 the court to have a full thread of all the messages  
8 between the two of them, as opposed to picking out  
9 the ones that -- so we could have them in context.

10 THE COURT: Okay. Are there a substantial --

11 MR. HAYSLETT: I don't -- I don't know the  
12 answer. She has --

13 THE COURT: Okay.

14 MR. HAYSLETT: I've never spoken to her before.  
15 If there are -- is a threat of -- if this is the only  
16 message, I have no objection. If she has received  
17 multiple messages back and forth, I just ask her to  
18 publish all of them.

19 THE COURT: Okay.

20 MR. PERLMAN: Judge?

21 THE COURT: Yeah?

22 MR. PERLMAN: I -- I think what we intend to do  
23 is just publish these five. You know, if Your Honor  
24 recalls, they asked for a continuance to engage in  
25 discovery. You know, to -- to put it kindly, they --

1       they slept on their rights. This is something they  
2       could have asked for. This is something they could  
3       have inquired on, and I -- I think to raise it at  
4       this juncture -- you know -- is a little bit unfair.  
5       They're -- they're coming in based on certain aspects  
6       of the statement, and they -- those statements have  
7       nothing to do with the balance of the dialogue. But  
8       if Counsel wanted to spend time on that, he had every  
9       right to do so before today.

10       THE COURT: Okay. All right. And so I think  
11       that my ruling is that I will admit these into  
12       evidence. I think it's fair for cross-examination to  
13       discuss the extent of their conversations and any  
14       before or after messages --

15       MR. HAYSLETT: Perfect.

16       THE COURT: -- and I will allow inquiry about  
17       that. Okay? So the -- they will -- so it'll be  
18       admitted over respondent's objection.

19       MR. PERLMAN: Thank you, Judge.

20       THE COURT: You may inquire.

21       Q       (By Mr. Perlman) Okay. So Ms. Christian, this  
22       is Exhibit 1. This is a direct message between you and  
23       Mr. Braddock, correct?

24       A       Yes, it is.

25       Q       Okay. And your comment is highlighted in dark

1 blue, correct?

2 A Yes.

3 Q Okay. And this was an exchange you had with him  
4 on May 14th, 2021, yes?

5 A Yes, sir.

6 Q Okay. It says he writing to you, and I quote,  
7 "We have an alliance, and Lune" -- L-U-N-E -- "is our  
8 target." And then beneath it, it says Luna -- L-U-N-A.  
9 Did I read that correctly?

10 A Yes.

11 Q Okay. And that was Mr. Braddock's authorship to  
12 you on this date, correct?

13 A Yes, it was.

14 Q Okay. Did you have an understanding of what he  
15 meant at the time in terms of Luna is our target?

16 A At that point in time, no. No, I -- I did not.

17 Q Okay. Fair enough.

18 MR. PERLMAN: There -- I -- I'd like to have  
19 the -- identify to the 2, next please?

20 Q (By Mr. Perlman) Do you recall having a message  
21 exchange with Mr. Braddock on May 3rd of 2021?

22 A Yes.

23 Q And is -- is -- would Exhibit 2 -- is it an  
24 accurate depiction of what it purports to represent?

25 A Yes, it is.

1 Q And then, it is again a screenshot picture of  
2 messaging between you and Mr. Braddock on May 3rd,  
3 correct?

4 A Yes, it is.

5 Q And your comments are in blue and his are not,  
6 yes?

7 A I'm in blue, yes.

8 Q Okay.

9 MR. PERLMAN: Could I move in Exhibit 2?

10 THE COURT: Okay.

11 MR. HAYSLETT: Same objection, Judge.

12 THE COURT: All right. It'll be admitted.

13 Q (By Mr. Perlman) And I'd bring your attention  
14 towards the bottom. Can you please read aloud what Mr.  
15 Braddock is telling you at the end there on this Exhibit  
16 2?

17 A When he says, "I'm not fucking around. I formed  
18 an alliance with Mackey as well. We cannot let Luna the  
19 lunatic win."

20 Q Right. Did this cause you any alarm when you  
21 got this text?

22 A Yeah, it did. It -- I -- I started questioning  
23 what was going on.

24 Q Okay. And let's move to Exhibit 4. Okay. Do  
25 you recall having a message exchange with Mr. Braddock on



1 or about May 26th of 2021?

2 A Yes. That's a text message -- that's not from  
3 Messenger.

4 Q Okay. And this is a text message between you  
5 and Mr. Braddock, correct?

6 A Yes.

7 Q Actually, I think that's Exhibit --

8 A No, no -- he -- he called me Amanda. That went  
9 to my phone. But that was to me. He used the wrong name.

10 Q Okay. And does this -- is this an accurate of  
11 what it purports to be?

12 A Yes, it is.

13 Q And that is a screenshot photograph of your  
14 phone of this text exchange between you and Mr. Braddock  
15 on May 26th, correct?

16 A Yes, it is.

17 Q Okay.

18 MR. PERLMAN: Judge, I would move Exhibit 4 to  
19 evidence?

20 MR. HAYSLETT: Same objection, Judge.

21 THE COURT: Okay. It'll be so received. And  
22 this is -- what was the date of this one?

23 MR. PERLMAN: May 26th.

24 THE COURT: Okay. Okay.

25 Q (By Mr. Perlman) And if I could page down to the

1 bottom? Uh, actually, right below the photograph, could  
2 you please read aloud what that message is from Mr.  
3 Braddock?

4 A He said, "Matt Tito and I are going to destroy  
5 her. Thank you, Amanda, for all your hard work organizing  
6 these events. I know it takes time away from family and  
7 resources. Amanda and I are going -- Amanda and I are  
8 good now, too. I forgot to say hi to her, but she got  
9 there late".

10 Q Okay. And I think you tried to clarify he  
11 really meant to say Audra?

12 A Yes. Thank you, Audra.

13 Q Okay. And did this comment from Braddock to you  
14 cause you any concern with the reference that he was -- he  
15 and Tito were going to destroy -- and correct me, it's  
16 referencing Luna, yes?

17 A Yes, it is talking about Luna.

18 Q Okay. And did that cause you any concern?

19 A Yeah. It started getting me a little -- the  
20 verbiage changed. You know, his -- his verbiage was  
21 getting increasingly violent, and it -- it started  
22 concerning me. Woman to woman, is what it was concerning  
23 me because most men don't talk like that.

24 Q Okay. And turning to Exhibit 5, did you have  
25 a -- another exchange with him on the same date, May 26th

1 of 2021? Did you get a text message or Facebook  
2 messaging?

3 A Yeah.

4 Q Okay. And he -- Mr. Braddock is light blue and  
5 you're dark blue on this exhibit?

6 A Yes.

7 Q Okay. And this Exhibit 5, is it an accurate  
8 depiction of what it purports to represent?

9 A Yes, it does.

10 Q And this is a screenshot --

11 A Uh-huh.

12 Q -- picture that you took off your phone based on  
13 the message exchange you had with Mr. Braddock on that  
14 date, yes?

15 A Yes, it is.

16 Q Okay. And what -- what is his second comment?  
17 What is he telling you?

18 A Where she lives. She lives off 34th behind  
19 Popeyes. Is that the one you're talking about?

20 Q Yes. Did -- did that concern you that he knows  
21 where she lives or she's -- he's sharing that?

22 A Yeah. That -- that's like, I -- I don't even  
23 know where she lives -- you know? And like that, I don't  
24 know where Braddock lives. I don't know where any of  
25 these people live. It's a little concerning when a man

1 has the kind of distaste for women in general, and now he  
2 knows where she lives. Woman to woman, that's -- that's a  
3 little scary --

4 Q Okay.

5 A -- that somebody would know where you're at.  
6 You know, that's -- you know -- you should be safe at  
7 home. That -- that was concerning for me.

8 Q Okay. And when -- let's turn your attention to  
9 what we marked as Exhibit 3. This purports to be a  
10 message between you and Mr. Braddock on June 8th or June  
11 9 -- do you recall having an exchange with him at that  
12 time of 2021?

13 A Yeah, I do.

14 Q Okay. And is this Exhibit 3 and accurate  
15 depiction of what it purports to represent?

16 A Yes, it is.

17 Q And that is a screenshot photograph that you  
18 took on your phone depicting an exchange you had with Mr.  
19 Braddock at that date and time, correct?

20 A Yes, it is.

21 MR. PERLMAN: Yeah, I'd -- I would move into  
22 evidence Exhibit 3, Judge.

23 THE COURT: Okay. Any objection?

24 MR. HAYSLETT: No, Judge.

25 THE COURT: Okay. And I -- did you move in

1 Number 5 as well?

2 MR. PERLMAN: I thought I did.

3 THE COURT: Okay.

4 MR. PERLMAN: And if I -- well, just for the  
5 record, I would -- just to be sure, I would move  
6 Exhibit 5 in, Judge.

7 THE COURT: Okay. Any objection?

8 MR. HAYSLETT: Same objection, Judge.

9 THE COURT: Okay. It'll be admitted over the  
10 objection. And what was the date on Exhibit 5's text  
11 messages?

12 MR. PERLMAN: May 26.

13 THE COURT: For Exhibit 5 as well?

14 MR. PERLMAN: No, I thought you asked for  
15 Exhibit 5?

16 THE COURT: Yeah, I'm trying to -- I've got  
17 Exhibit 1 was May 14th. I've got Exhibit 2 on 6/8,  
18 Exhibit 3, 5/26; Exhibit 4, 5/26; and Exhibit 5,  
19 5/26; is that correct?

20 MR. PERLMAN: 4 and 5 are 5/26. Exhibit 2 is  
21 May 3rd, and Exhibit 3 is 6/8 or 6/9. Sometimes I  
22 can't read my own handwriting.

23 THE COURT: Okay. All right. All right. Just  
24 wanted to clarify so that I can observe these in  
25 context. Okay.

1 MR. PERLMAN: Certainly.

2 THE COURT: All right.

3 Q (By Mr. Perlman) And again, Ms. Christian, this  
4 message you had with Mr. Braddock in June of 2021, your  
5 comments are dark blue, correct?

6 A Yes, they are.

7 Q Okay. And what is Mr. Braddock writing you  
8 beneath your message? Can you just read the next three  
9 lines?

10 A He said, "Luna is a grease spot. Makki and Tito  
11 and myself are taking her out. Please don't be associated  
12 with her."

13 Q And were you alarmed from the use of that  
14 verbiage with regard to their taking her out?

15 A Yeah, and I come from a military family, and  
16 dead bodies are sometimes called grease spots. And -- and  
17 to me, it -- it was a -- it was a, like, a -- a lack of  
18 respect for a human person to call them a -- a grease  
19 spot, like that's all they are. And it -- it -- it really  
20 started worrying me. You know, there's -- I'm -- I'm  
21 totally okay with healthy competition, but it -- it took a  
22 very dark turn, and I -- I was not okay with that. And --  
23 and to take her out, I'm like, I -- I don't know. This  
24 isn't -- this isn't okay. You know, the verbiages kept  
25 getting more and more violent.

1 Q And then based on the collection of  
2 communications of Luna being his target, then wanting to  
3 take Luna out, wanting to destroy her, in their references  
4 to her homestead, did -- did you get concerned over the  
5 safety and well-being of Ms. Luna?

6 A Yeah, yeah. And just as a -- like I said  
7 before, like a woman to woman, like, hey -- you know --  
8 this guy's kind of getting really aggressive. You need to  
9 watch yourself.

10 Q And did you call her and -- and share these  
11 communications with her towards that end?

12 A I did. I mean, I called her, she called me a  
13 few days later, 'cause we don't -- you know -- we don't  
14 know each other very well. And I said, hey, you need  
15 to -- you know -- this guy, his -- his verbiage is  
16 changing, and it -- it's not right. It's kind of like red  
17 flags everywhere. You -- you need to look into this or  
18 just -- you know -- don't go around him without your  
19 husband. You know, he knows where you live -- I'm not  
20 okay with that. That's not okay.

21 Q Okay. So -- and you warned Ms. Luna because the  
22 communications from Braddock caused you concern over her  
23 safety and well-being, correct?

24 A Right. Uh-huh.

25 Q Okay. And have you been in touch with Mr.

1 Braddock recently?

2 A No. Uh-uh.

3 Q Okay.

4 MR. PERLMAN: That -- that's all I have for this  
5 witness, Judge.

6 THE COURT: Okay. When did you warn Ms.  
7 Braddock -- I mean Ms. Luna?

8 THE WITNESS: About the time I got these  
9 messages. It was after I got the messages.

10 THE COURT: We're talking about a date range  
11 between May 3rd and June 9th, so is it -- like, did  
12 you get any messages after you called her?

13 THE WITNESS: You know -- hold on one -- hold on  
14 one second.

15 THE COURT: Okay.

16 THE WITNESS: Shane -- door. Shane, shut the  
17 door. I'm in court. Oh, my gosh. This is why we  
18 should go into court. In a second. I'm sorry. Shut  
19 the door. Thank you. Sorry. Okay.

20 So when did I tell her? I -- I don't remember  
21 the exact date, but it was -- I believe it was in  
22 May.

23 THE COURT: Okay.

24 THE WITNESS: Because I -- I actually called  
25 her, and then she called me back.



1           THE COURT: Okay. And was there any particular  
2 message that you can reference -- since we have  
3 messages from the very beginning of May through the  
4 end of May that prompted you to make that phone call?

5           THE WITNESS: Yeah, the grease spot. Knowing  
6 where she lived, that's kind of like, why do you know  
7 where she lives --

8           THE COURT: Uh-huh.

9           THE WITNESS: -- if you're not friends? The  
10 whole, like, calling her -- like, calling a person  
11 trash. Like, I get it if you're enemies you're going  
12 to fight, but to call somebody trash, to call them a  
13 grease spot -- that's like a rotting body, okay -- so  
14 to me, that, as a woman, if anybody was saying this  
15 about any woman, I would have said, hey, just so you  
16 know, you might want to watch being around this  
17 person -- you know -- this is what they said about  
18 you. That -- I mean, that is just a common courtesy.

19          THE COURT: Okay. That's all my questions. Any  
20 cross-examination?

21          MR. HAYSLETT: Yeah, a couple questions.

22          MS. JANES: Your Honor, I've got questions for  
23 Ms. Christian on --

24          THE COURT: Oh, sorry.

25          MS. JANES: -- on direct.

1           THE COURT:  Go ahead.  You may inquire, Ms.  
2           Janes.

3           MS. JANES:  Thank you.

4                                 DIRECT EXAMINATION

5  BY MS. JANES:

6           Q     Ms. Christian, hi.  My name is Katherine Janes,  
7  and I'm the attorney for Erin Olszewski, and I appreciate  
8  you being here this afternoon.  I've got just a few  
9  questions for you, if that's okay.

10          A     Sure.

11          Q     So how do you know Ms. Olszewski?

12          A     Oh, gosh.  So I met Erin a long time ago when I  
13  was a speaker on a panel.  Gosh, it had to be a year and a  
14  half ago now -- with Judy Mikovits -- I was a panel  
15  addition.

16          Q     Okay.  So now I'm going to talk about Mr.  
17  Braddock reaching out to you to try and get -- get in  
18  contact with Ms. Olszewski.

19          A     Right.

20          Q     Well, let me back up.  Did -- did Mr. Braddock  
21  reach out to you to -- to try and get in touch with --  
22  with Ms. Olszewski?

23          A     He did.  He -- he called me to see if he could  
24  get her phone number.  And -- you know -- everybody knows  
25  Nurse Erin -- you know -- she's one of the -- you know --

1 biggest whistleblowers in the world -- let's be honest.  
2 And he called and asked if -- if he could have her number.  
3 I placated him. I did not give the number because the  
4 first time he ever called me, he called me at 1:00 in the  
5 morning asking for my hot nurse friend's phone number  
6 because he was horny. That was the first time I ever  
7 spoke to the guy on the phone. He called me at 1:00 in  
8 the morning and that's what -- he was looking for my --  
9 my -- my friend Fiona (phonetic), and he said he liked hot  
10 nurses.

11       So when he asked me for Nurse Erin's phone number, I  
12 was like, yeah, yeah, yeah, I'll get it for you, and I  
13 never relayed the message because I'm going back to my  
14 reference of ever talking to him, first time on the phone,  
15 it's 1:00 in the morning -- okay -- looking for a booty  
16 call. So I -- I honestly was like, I'm not going to give  
17 her that issue. And I placated him. And then he called  
18 me again and he wanted her phone number again. And at  
19 that point in time, her son was in the hospital, and I  
20 said, listen, her son's in the hospital, it's really not a  
21 good time because, like, what I'm saying is -- I'm  
22 thinking the history of the phone call, her son is sick,  
23 there's no way, I'm not doing that to the woman.

24       Then he had this situation where he -- he came at me  
25 again, and said hey, I want to get her phone number. I

1 want her to be part of this panel. And -- and I thought,  
2 well, you know, I can't make -- if it's a panel and it's  
3 going to be legit, I can't make her decisions for her, so  
4 I called her and said hey, this guy William Braddock, he's  
5 doing a panel for medical things, do you want to talk to  
6 him -- you know -- maybe you can get some truth out there.  
7 She's an advocate. She's a health advocate. And she's  
8 like, well -- well, okay -- maybe -- okay -- well, I'll  
9 talk to him. And then I end up giving -- I -- I believe I  
10 gave her phone number to him and said go ahead and -- and  
11 call her. So that's how that went down.

12 Q Thank you. And thank you for your -- your  
13 candor.

14 A They said the whole truth -- so there you go.  
15 There's the whole truth.

16 Q So I just want to make sure I'm clear on how  
17 many times Mr. Braddock asked for her contact information.  
18 It sounds like it was at least three times --

19 A Yeah.

20 Q -- before you -- you -- you turned it over  
21 and -- and I think -- I think the answer to this next  
22 question is kind of implicit in what you've said already,  
23 but -- but I'd like to -- for you to -- to -- to clearly  
24 state -- you know -- why it was that you were concerned  
25 about putting Mr. Braddock in contact with -- with Ms.

1 Olszewski?

2           A       There's -- there's a blatant lack of respect for  
3 women. Obviously, there's a lack of respect for their  
4 bodies. I -- I mean, you -- you know -- when he called me  
5 and said -- you know -- it was a booty call for a friend  
6 of mine, like, I'm not a pimp, I'm not going to give you  
7 my friend's phone number. But then -- and then I was  
8 like, hey, aren't you married? And he goes, yeah, but  
9 we're on different continents, so we have an  
10 understanding. And I just thought -- you know -- if  
11 you're not going to even protect your own family, like,  
12 it -- there just -- I'm not okay with a lack of respect  
13 for women, the lack of respect for women's' bodies --  
14 that's alarming, because most men aren't like that. So --  
15 I had red flags all over the place, so yeah.

16           Q       Thank you so much. I -- I appreciate -- I know  
17 you've had to be very patient today, and you've been very  
18 candid and I -- I -- I appreciate you taking the time.  
19 Thank you so much.

20           A       Thank you. You're welcome.

21           THE COURT: All right. Any questions in cross-  
22 examination?

23           MR. HAYSLETT: Sure, Judge.

24   CROSS-EXAMINATION

25 BY MR. HAYSLETT:

1 Q When did you first meet Mr. Braddock?

2 A I was at our Patriot meeting that we have, and  
3 he came in and introduced himself to me.

4 Q Do you know when that was? Do you know when  
5 that was?

6 A I -- gosh, I have not thought about that. I  
7 would have to say it was, like, March.

8 Q And when you communicated with him, was that on  
9 text or was it through the Facebook chat, or was it on a  
10 phone?

11 A Well, seeing how I'm a very busy professional,  
12 and I'm married and I have a huge family, he would contact  
13 me. Very rarely have I ever reached out to him. But when  
14 he did contact me, it was via Messenger, via text, or he'd  
15 call me.

16 Q And the Messenger, do you know when you first  
17 had contact with him on Messenger?

18 A If you give me a second, I can go back and look.

19 Q That'd be great.

20 A Yeah, hold on one second. I guess I put his  
21 name wrong. Hold on one second. Well, I don't know what  
22 happened to Messenger. Did he change it?

23 Q Not that I'm aware of.

24 A I don't know. Hold on. Something's not right.  
25 Did he change his name -- did he change his name? Come

1 on. Did he change his name on -- on the chat to hide  
2 himself?

3 Q I have no idea.

4 A Because it's not coming up.

5 Q Do you have any --

6 A Well, it should come up because I did not delete  
7 him or block him, and I was able to see this the other  
8 day.

9 Q Okay. How about your text messages?

10 A Hold on.

11 Q Or any messages you have from him?

12 A Let's see. Let me go back to text messages.

13 Now, I was -- we were talking on Messenger before we were  
14 talking on text.

15 Q Okay.

16 A And the earliest text I have from him is April  
17 28th. But it's weird that he's gone from Messenger now,  
18 because I did not block or delete him, so that's weird.

19 Q Do you have any messages on Messenger at this  
20 point?

21 A Well, I should.

22 Q But -- but I understand. But do you have any  
23 today?

24 A Well, you're going to give me a moment.

25 Q Sure.

1           A     I have to look.

2           Q     Sure. Please.

3           A     Let's see. I should have something. I don't  
4 see anything. Hold on one second. Did he delete his  
5 account? Oh, wait. I do. I do have it. Okay. I found  
6 it. So you can't search him anymore, which is strange,  
7 but you can go all the way back through down to the thread  
8 and find him.

9           Q     Okay.

10          A     Hold on. I have to scroll up.

11          Q     No problem.

12          A     Okay. So the first one I have is March 31st.

13          Q     Any of those messages prior to these ever  
14 mention Ms. Luna or Ms. Olszewski as you scroll through  
15 them?

16          A     Let me look.

17          Q     And while you're doing that, can you give us a  
18 context -- we don't know as we sit here whether you  
19 have --

20          A     Uh-huh.

21          Q     -- one page of messages or 55 pages of messages.  
22 I mean, because we don't know how many times you've  
23 communicated with him.

24          A     Oh, a lot. I mean, it's -- it would take a  
25 while to screenshot it all. So let's see. We are



1 laughing some people. We're laughing at candidates that  
2 don't have nerve to stand up -- to stand up for things.  
3 Talking about Trump. How to run a campaign. Oh, April  
4 1st. He's talking about Fiona -- nurse -- the hot nurse.

5 Q Right. I'm more interested in any other  
6 statements other than these.

7 A Hold on.

8 Q Can I presume this is the only time he ever  
9 referenced Ms. Luna or he never --

10 A No. Let's see. Talking about Marco Rubio,  
11 'cause you said you wanted to know what it was. North  
12 Pinellas Republican Club. So on April 13th, did you see  
13 Luna's event April 20th, it's downtown St. Pete on  
14 Central. I said, no, where did you find that? He said my  
15 PR guy in Tampa just sent me this, I had no clue either  
16 until just now. And he said Log Cabin Republicans of  
17 Tampa, why are they coming over there? I guess they can't  
18 get Luna to speak across the bay. I said, the Log Cabin  
19 group is pretty cool, I like them. He said okay, I need  
20 to find out more. So she was back in April -- April 13th.

21 But I knew that he was running against her way  
22 back -- you know -- in March when we first met.

23 Q 'Cause that's what he told you?

24 A Yeah. Uh-huh. Yeah.

25 Q Help me out -- understand that -- it seems -- I

1 understand if on the statements he made to you -- you  
2 know -- I'm going to take her out.

3 A Right.

4 Q But he references -- but he references Makki and  
5 Tito, and I find that interesting. What was your take on  
6 that?

7 A I believed him, that they were working with him.  
8 It's not uncommon for candidates to run around together --  
9 you know -- and -- and be chums. So I -- I saw them in  
10 public together. I saw them at a meeting at Salty J's in  
11 St. Pete together -- all of them -- so for them to say  
12 they don't know each other, they've never hung out, I have  
13 a photograph of some of them together at that meeting. I  
14 was completely convinced that they were together because I  
15 saw them together myself, and other people have, too, at a  
16 campaign meeting. Like, it -- they were talking about  
17 campaigns.

18 Q I'm trying to figure out, 'cause I -- I'm not  
19 involved in this world like you are --

20 A Uh-huh.

21 Q -- when that happens and people say we're going  
22 to take this person out or take that person out -- you  
23 know -- it -- I -- I don't know if this is, like -- you  
24 know -- Survivor, where they're forming this --

25 A Okay.

1 Q -- sort of -- some sort of -- you know --  
2 compact where they're going to work together to get this  
3 other person out of the race, or is this like a bad video  
4 where they're going to -- you know -- assault her house  
5 and kill her? When you -- when he -- when the comment  
6 is -- you know -- Amanda, or Makki and Tito and I are  
7 going to take her out, I mean, you're in politics more  
8 than anybody else in this room is -- is that something  
9 that is a common thing where people work together to get  
10 the other person "out of the race"? Or is it --

11 A Yeah.

12 Q -- all -- okay.

13 A Yeah. It's called splitting the vote.

14 Q Okay.

15 A So they'll throw some people in there to split  
16 the vote in the primary, which is what they're -- I'm  
17 assuming they're trying to do. And it's not uncommon for  
18 people to work together. But what really bothered me  
19 was -- you know -- you forget Makki, forget Tito. When a  
20 man is calling another woman a grease spot, when he's  
21 disregarding her sanctity of life, and -- and I -- I'm --  
22 like I said, the booty call at 1:00 in the morning,  
23 combined with all of this language, combined with -- you  
24 know -- all this stuff, I was concerned for her.

25 Q Got you.

1           A     This was -- this is not your normal, hey, I'm  
2 going kick their butt, I'm going to win the primary. This  
3 is beyond.

4           Q     Got you. Got you. Other than those --

5           A     And I never saw anything contrary to what he  
6 said, either.

7           Q     Got you.

8           A     All right.

9           Q     Meaning that -- that you always thought this was  
10 him working -- boorish behavior, but working with other  
11 candidates to split the vote?

12          A     Yes. Uh-huh. Yeah.

13          Q     And that seemed the -- the tenor of what you've  
14 just said is kind of what's repeated over and over with  
15 different people -- Makki and Tito are together. We're  
16 going to take her out. We're going to do this.

17          A     Right.

18          Q     And that would not be an unusual politic talk in  
19 a -- in a race to gain an advantage?

20          A     I mean, take her out's a little aggressive.

21          Q     Well, I -- I -- I understand.

22          A     Yeah.

23          Q     Okay.

24          A     Uh-huh.

25               MR. HAYSLETT: Nothing else, Judge.

1 THE COURT: Okay. Any redirect Mr. Perlman?

2 MR. PERLMAN: No, thank you, Judge.

3 THE COURT: All right. Ms. Janes?

4 MS. JANES: None from me, Your Honor. Thank  
5 you.

6 THE COURT: All right. And may this witness be  
7 released?

8 MS. JANES: Yes, Your Honor.

9 THE COURT: Okay. All right.

10 THE WITNESS: So I'd leave the room now?

11 THE COURT: Yeah, hold on. I'll --

12 THE WITNESS: Okay.

13 THE COURT: I can -- I can remove you from  
14 there. All right.

15 THE WITNESS: Okay.

16 MR. PERLMAN: Thank you, Ms. Christian.

17 THE WITNESS: Thank you. Bye.

18 THE COURT: All right. Okay. And I do have a  
19 Amanda in my waiting room. Is that somebody's  
20 witness, or --

21 MR. PERLMAN: Yes. She's next.

22 THE COURT: Okay. Excellent. All right. Hi,  
23 Amanda. Can you turn your video capability on if  
24 possible so I can swear you in?

25 MS. CAPES: Sure. I'm trying. Hold on one

1 second.

2 THE COURT: Okay.

3 MS. CAPES: If I can figure this out.

4 THE COURT: You're -- you're already a step  
5 ahead. All right.

6 MS. CAPES: There we go.

7 THE COURT: Hi. All right. Hold on a second,  
8 let me turn the video back around to me. Hold on.

9 MS. CAPES: Sorry for the informal location.

10 THE COURT: Oh, you -- you wouldn't believe what  
11 I see, so. Ma'am, can you raise your right hand?

12 MS. CAPES: Oh, yes.

13 THEREUPON,

14 AMANDA CAPES,

15 the witness herein, having been duly sworn, was examined  
16 and testified as follows:

17 MS. CAPES: Yes, I do.

18 THE COURT: Okay. All right. Mr. Perlman, you  
19 may -- you can put your hand down. Mr. Perlman, you  
20 may inquire.

21 MR. PERLMAN: Thank you.

22 DIRECT EXAMINATION

23 BY MR. PERLMAN:

24 Q Can you please state your name for the record?

25 A Amanda Capes.

1 Q Ms. Capes, thank you for your patience. I think  
2 all parties in the court really appreciate your  
3 availability for today.

4 A No problem.

5 Q Do you know the respondent in this case, Mr.  
6 Braddock?

7 A I've met him a few times because he came to a  
8 couple of our meetings for our Community Patriots.

9 Q Your -- what -- what is -- can you tell the  
10 Court what Community Patriots Pinellas is?

11 A It's kind of just like a grassroots community of  
12 people just -- you know -- just trying to -- you know --  
13 do things for cause for freedom, and -- you know -- hold  
14 your government accountable, things like that. Just a  
15 community like a volunteer organization.

16 Q Is it limited to members only?

17 A No. We don't have, like, membership. We don't  
18 have, like -- I mean, anyone can come visit if they want.

19 Q Okay. And is that how you know Mr. Braddock,  
20 from your involvement with that community?

21 A Yeah. I don't know if it was on Facebook. I --  
22 I don't know if I knew of him on Facebook first or at the  
23 actual meeting, but, I mean, I don't really know him well,  
24 I just -- you know -- I -- I maybe met him a couple times  
25 there. Maybe once or twice. And then -- you know -- have

1 seen him around on some pages on Facebook.

2 Q Okay. Now, do you have particular  
3 responsibilities with regard to the community page at  
4 Pinellas?

5 A Yeah. I mostly deal with the social media part,  
6 so -- you know -- I'm responsible for -- there's multiple  
7 of us, but I'm one of the main people that's responsible  
8 for -- you know -- approving if things go on our page,  
9 or -- I mean, it's a pretty open forum, but within reason.  
10 I'm responsible for -- you know -- putting up, like,  
11 events that are coming up, and vetting people that come  
12 through on the page. You know, sometimes you have some  
13 kind of -- you know -- strange person wanting to sell  
14 things, or -- you know -- that kind of thing.

15 Q And am I able to log on to that Facebook  
16 messaging for Community Patriots Pinellas?

17 A You are. You would have to request to join, and  
18 then I'd have to approve you -- or one of the other two  
19 people that can approve would have to approve you.

20 Q Okay. So -- so there are approved participants  
21 that have access to the postings for Community Patriot  
22 Pinellas, correct?

23 A Yes. And then when they want to post something,  
24 they also have to be approved to post it.

25 Q Right. And you're involved in the preapproval



1 process?

2 A Yeah. Yeah. Me and two other people. But I --  
3 I would say I do a pretty good amount of it.

4 Q Okay. And do you know Ms. Luna?

5 A Yeah. Uh-huh.

6 Q And how do you know her?

7 A Just basically from, like, her campaign last  
8 year. Met her at a bunch of events she was doing at  
9 conservative grounds and stuff like that, and -- you  
10 know -- just became friendly with her that way, 'cause she  
11 was -- you know -- running for our district, so I -- I  
12 supported her last year, voted for her.

13 Q Is -- is she one of the members of the Community  
14 Patriot Pinellas --

15 A Yeah.

16 Q -- messaging? Yes? Okay.

17 A Yeah, she's in that group.

18 Q Okay. And let me show you what's been marked as  
19 Exhibit 7.

20 A Okay. Do I need to scroll on my phone?

21 Q No. We're going to try and post it. Just --  
22 you're too quick, but thank you.

23 A Oh, okay.

24 Q Can you tell if this is a posting on the  
25 Community Patriots Pinellas messaging board?

1           A       This is actually a post that he did try to post  
2 to that page. It's the same exact post and the same exact  
3 wording and the same exact picture, so I assume that  
4 that's the same one. It just says his name though. It  
5 doesn't have -- you know -- my page on the top -- but I  
6 didn't approve it, so -- because what happens is if  
7 somebody is -- if somebody posts something that's from  
8 their own page that's not public on their own page, when  
9 they post it to a group, the people that are friends with  
10 them can see the pictures. The people that are not  
11 friends with him cannot see the pictures, if that makes  
12 sense.

13           Q       Well, not to me, but as long as it makes sense  
14 to you.

15           A       Yeah.

16           Q       So because he was already part of the community,  
17 was he able to post this on -- on the Community Patriots  
18 Pinellas messaging?

19           A       He was able to post it, but I -- I didn't  
20 approve it through because the pictures were not showing  
21 up because he didn't mark it as public. So then when I  
22 went to his own page, I saw what it was. But I wasn't  
23 going to put it through, because I -- I mean, I hadn't  
24 read it, I didn't know what it was, and the way it was  
25 talking, I just thought it -- you know -- I'll just hold

1 off. I didn't want to get involved in that, so.

2 Q Okay. And do -- do you know if Ms. Luna is --  
3 is, likewise, a member of this Community Patriots Pinellas  
4 messaging?

5 A Yes, she is. Yeah, and he -- he -- he was, too.  
6 We have -- you know -- we have quite a few -- you know --  
7 local candidates that want to be involved in the  
8 Community, so they're on there.

9 Q Okay. And did -- did you take a screenshot of  
10 this Exhibit 7?

11 A I did. Uh-huh.

12 Q And would you say that it's an accurate  
13 depiction of what it purports to represent?

14 A It is.

15 MR. PERLMAN: Judge, I would move into evidence  
16 Exhibit 7.

17 THE COURT: Any objection?

18 MR. HAYSLETT: Judge, I just --

19 THE WITNESS: Yeah, I was going to say, now you  
20 just moved it down there. I was going to say,  
21 there's a couple more pictures. Yep.

22 THE COURT: All right.

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

24 If this is what was presented to the Community  
25 Patriots Pinellas Official, I have no objection

1 'cause she runs that.

2 THE COURT: Okay.

3 MR. HAYSLETT: If this is a screenshot of his --  
4 of what purports to be a Facebook page, then I would  
5 object.

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

7 MR. HAYSLETT: But I think she said it was the  
8 former, not the latter.

9 THE COURT: Okay.

10 THE WITNESS: No, this is exactly what he posted  
11 to Community Patriots. The only difference is, is  
12 that whoever was not friends with him would not be  
13 able to see the photos.

14 MR. HAYSLETT: Got you. Okay.

15 THE WITNESS: So yeah -- I mean, I was able to,  
16 'cause I was Facebook friends with him, so I was able  
17 to see all of it.

18 THE COURT: Okay.

19 MR. HAYSLETT: I -- I guess --

20 THE WITNESS: The wording you would still be  
21 able to see either way, but the pictures -- so like,  
22 if you're on your own page on Facebook --

23 MR. HAYSLETT: Sure.

24 THE WITNESS: -- and you -- and you hit share,  
25 and you share to a page -- let's say I share to

1 Community Patriots or I share to Tampa Bay Times,  
2 whoever I want to share it to -- and I share to it,  
3 people that are not friends with me, if that -- if  
4 that post was initially not marked public, cannot see  
5 the pictures. But anyone that is friends with me can  
6 see the pictures. That's kind of how it works.

7 MR. HAYSLETT: I -- I just was confused. Was  
8 it -- was it approved and posted, or not posted?

9 THE WITNESS: No, I did not approve it.

10 MR. HAYSLETT: Okay. So it was never posted to  
11 that group?

12 THE WITNESS: This one I did not approve, no.

13 MR. HAYSLETT: Okay. Then I have no  
14 questions -- I have no objection, Judge.

15 THE COURT: Okay.

16 THE WITNESS: Okay.

17 THE COURT: So let me just clarify. So this is  
18 the post you receive and you review, and you either  
19 approve it and it goes actually on your Facebook  
20 page, or you reject it or not approve and then it  
21 never gets actually posted out on --

22 THE WITNESS: Right.

23 THE COURT: -- on your, I guess, organization's  
24 page?

25 THE WITNESS: Right. And generally, I don't --

1       you know -- generally we don't try to censor peoples'  
2       opinions or anything, but this was just a little  
3       bit -- I just -- you know -- I didn't want to get  
4       involved, and it was, like -- you know -- it just  
5       seemed a little bit -- you know -- it was abrupt. I  
6       didn't know --

7               THE COURT:   Okay.

8               THE WITNESS:  -- what was going on, so I just --

9               THE COURT:   Okay.

10              THE WITNESS:  I didn't approve it.

11              THE COURT:   All right.

12              THE WITNESS:  And that's why I went and looked  
13       on the actual page, because those things were not  
14       showing on the actual -- you know, to go in -- the --  
15       the pictures weren't showing. So I went and looked,  
16       and on his -- you know, it -- it was showing, so  
17       that's why I screenshotted it.

18              THE COURT:   Okay.

19              THE WITNESS:  So I -- that's what it was.

20              THE COURT:   Okay. But it never went out there  
21       to the community?

22              THE WITNESS:  This, no.

23              THE COURT:   Okay.

24              THE WITNESS:  Uh-uh.

25              THE COURT:   And did you ever share this with Ms.

1 Luna?

2 THE WITNESS: I don't remember. I could've  
3 said, like, is -- is this your handwriting, or is  
4 this -- you know -- did you -- is this true? Or --  
5 I -- I don't know. I don't really remember. I mean,  
6 at some point, yeah, I -- at some point, I would've  
7 asked, like -- you know -- is this true? You know --  
8 is this stuff going on? What's -- what's happening  
9 there?

10 THE COURT: Okay. Any additional questions, Mr.  
11 Hayslett?

12 MR. HAYSLETT: Well, I have cross-examination,  
13 but not -- not on -- cross, but not on --

14 THE COURT: Oh, okay. I'm sorry.

15 MR. HAYSLETT: -- the admission of this. Sorry.

16 THE COURT: All right. So I will move it into  
17 evidence as Exhibit 7. You may continue, Mr.  
18 Perlman.

19 MR. PERLMAN: Thank you, Judge, although, you  
20 know, I have to confess, I'm slightly a little  
21 confused. My -- my understanding was that this  
22 posting went out, but Exhibit 8 is what was declined.  
23 I just want to refresh the witness's recollection if  
24 I could --

25 THE WITNESS: Okay.

1 MR. PERLMAN: -- refer to Exhibit 8?

2 THE WITNESS: Okay. This post that you're  
3 showing is actually his post. So this post that  
4 you're showing is his original post. So that post  
5 did go out on his page. Anyone that was friends with  
6 him could view it. That was fine. But then he  
7 attempted to share it on our page.

8 MR. PERLMAN: Okay.

9 THE WITNESS: So whoever is in -- whoever is in  
10 the admin is who would have seen it.

11 THE COURT: Okay.

12 THE WITNESS: Admins and moderators could have  
13 seen it, but I am the one that looked at it, and it  
14 just -- and I -- since the pictures were blank on  
15 that page, I went and looked and -- and -- you  
16 know -- I'd actually sent him messages before with  
17 blank pictures of things he's posted and said, oh,  
18 hey, look, you posted something, you must've not  
19 marked it public, it wasn't -- you know -- this is --  
20 you know -- before any of this stuff. But -- you  
21 know -- I had -- I had sent him a couple of messages  
22 before saying -- you know -- look, your picture's  
23 coming up blank. You know -- so that's probably the  
24 process I was in in my mind, going and saying, oh,  
25 what did he try to post.



1 Q (By Mr. Perlman) Okay. So this Exhibit 7  
2 posting went out by Mr. Braddock, and with regard to  
3 the --

4 A Yes.

5 Q -- Community Patriots online community, if the  
6 member was also a Facebook friend with Mr. Braddock, the  
7 photos showed up and --

8 A Correct.

9 Q -- and if they weren't, they got the message  
10 without the photos; is that correct?

11 A Correct. Correct. It would say content  
12 available where the photos is, right.

13 Q Okay.

14 MR. PERLMAN: And -- and Judge, just for the  
15 record, this is the document that I believe Mr.  
16 Hayslett referenced in his opening comments in terms  
17 of a posting that -- that Mr. Braddock had made. And  
18 so it's -- I just wanted to let the Court know it's  
19 the same thing that he had referenced early on --  
20 earlier this morning. But that -- that's all I have  
21 for this witness.

22 THE COURT: Okay. All right. Ms. Janes?

23 DIRECT EXAMINATION

24 BY MS. JANES:

25 Q I -- I just want to make sure I understand

1 correctly. So this is a post that was posted to Mr.  
2 Braddock's Facebook page, and -- and -- and it did post  
3 there?

4 A Yeah.

5 Q So anyone friends with Mr. Braddock on Facebook  
6 would have seen this; is that right?

7 A Yes. Correct.

8 Q And then he tried to share it to a second page,  
9 the Community Patriots page that you're an admin of?

10 A Right.

11 Q But because he didn't put his settings  
12 correctly, it did not get approved for posting on the  
13 Community Patriots page. But it -- he did post it out  
14 there for the world to see --

15 A Right.

16 Q -- in terms -- anybody --

17 A So we -- we -- we have a lot of members on  
18 there. Whatever you post we pretty much put through. But  
19 the thing is, is that if on your original post, if -- if  
20 you don't mark it public, then it's -- you know -- it's  
21 the writing will show up, but the pictures will not. So  
22 the -- the five pictures of whatever will say content not  
23 available. And often when someone does that, they don't  
24 mean to do that. They -- they thought that it was marked  
25 public so they could share it, and so I'll just screenshot

1 it sometimes and send it to them and say hey -- you  
2 know -- if you want to do this, mark it public so it will  
3 show. But again, that one I did send to him -- I don't  
4 think I sent that one to him, because it was kind of like  
5 I didn't want to get involved. When I read it, I was,  
6 like, oh, you know, I don't know what's going on. So --  
7 yeah.

8 Q But -- but just to be clear, this is a post that  
9 actually was published on Mr. Braddock's Facebook page?

10 A Yes.

11 Q Okay. Thank you for helping me understand that.

12 I'm --

13 A Correct.

14 Q I -- I try to be tech-savvy, but --

15 A It's hard to understand.

16 Q Yeah. Okay. Thank you so much.

17 MS. JANES: I don't have any further questions  
18 for this witness, Your Honor.

19 THE WITNESS: Okay.

20 THE COURT: All right. Mr. Hayslett?

21 MR. HAYSLETT: Yes. I got two exhibits that  
22 purport to be Community Patriots official. There's  
23 the one that you just -- I don't know if she can see  
24 this. Where can I see it?

25 THE COURT: The one -- one with the injunction

1 document --

2 MR. HAYSLETT: One was the injunction. This  
3 other one's -- it has community -- it says Community  
4 Patriots Pinellas Official.

5 THE COURT: All right. Hold on.

6 THE WITNESS: Yeah.

7 MR. HAYSLETT: Can I presume, Mr. Perlman or Ms.  
8 Janes, you don't enter -- you don't want to introduce  
9 that, right?

10 MR. PERLMAN: We're just trying to move  
11 things -- yeah. I was just making sure I'm not on  
12 mute. Yeah, we're just trying to advance the case.  
13 That's correct.

14 MR. HAYSLETT: So -- so you're not going to  
15 introduce this through her?

16 MR. PERLMAN: That's right.

17 MR. HAYSLETT: Okay. The -- let me ask you some  
18 questions about this first one, then I'll ask you  
19 questions about the second one.

20 MR. PERLMAN: Well, let me -- let me do that.  
21 Let me -- let me get it into the record if you're  
22 going to reference it, if I may.

23 MR. HAYSLETT: Sure.

24 THE COURT: Sure.

25 DIRECT EXAMINATION

1 BY MR. PERLMAN:

2 Q Again, Ms. Capes, I'm going to put on Exhibit 8.

3 A Okay.

4 Q And is the screenshot photograph that you took  
5 on -- on or about June 14th?

6 A Yeah. Uh-huh. Yeah, and this is actually  
7 the -- this is what it -- it appears like originally when  
8 it comes through to approve or not approve.

9 Q Okay. Well, let me just ask you if this Exhibit  
10 8 is an accurate depiction of what it purports to  
11 represent?

12 MR. HAYSLETT: I -- I have no objection, by the  
13 way, Judge.

14 THE COURT: Okay. All right. And what was  
15 the --

16 THE WITNESS: Yeah.

17 THE COURT: What was the date of this one?

18 MR. PERLMAN: June 14th.

19 THE COURT: June 14th. Okay. All right. So  
20 it'll be so admitted.

21 MR. PERLMAN: Okay. All right.

22 Q (By Mr. Perlman) So is this another posting  
23 request by Mr. Braddock with regard to Community Patriots  
24 Pinellas in which you or someone else in your  
25 administrative capacity would approve or decline?

1           A     Yes.

2           Q     Okay.  So if I understand that correctly, it's  
3 his attempt to post something on a social media -- that  
4 being the Community Patriots Pinellas --

5           A     Right.

6           Q     -- which Ms. Luna is a member of, correct?

7           A     Correct.

8           Q     Okay.  And if I also understand your earlier  
9 testimony, I believe in your administrative capacity, you  
10 declined his effort to -- to -- for this post to go out  
11 into the Pinellas Community, correct?

12          A     Right.  Right.  I mean, again, we don't  
13 generally, like -- you know -- censor peoples' opinions,  
14 but this whole thing's was kind of just like shocking.  
15 Like -- you know -- I -- I didn't want to, like, put  
16 inflammatory stuff, or -- you know -- I don't know.  I was  
17 just still trying to figure out what the heck's going on.  
18 And -- you know -- so I -- the way it was worded, again, I  
19 just kind of felt like it was eh, so I declined it.

20          Q     Okay.

21               MR. PERLMAN:  All right.  I don't -- Mr.  
22 Hayslett, thank you for letting me --

23               MR. HAYSLETT:  No problem.

24               MR. PERLMAN:  Okay.  Thank you.

25                               CROSS-EXAMINATION

1 BY MR. HAYSLETT:

2 Q Ma'am, the -- let -- let me go to the first one  
3 we talked about, which was the one that says when someone  
4 is so desperate to win -- not this one, but the past one.  
5 As I understand it with both of these, they were posted on  
6 the Community Patriots Pinellas Official page, but you in  
7 your capacity as an administrator declined them; is that  
8 right?

9 A Right. Right.

10 Q And the first one, part of the reason you did it  
11 is it was on -- it was not on a public setting, meaning  
12 that you couldn't see the pictures because he didn't check  
13 public?

14 A Well, that's why I could see the pictures on  
15 the -- the post -- on the post submitted --

16 Q 'Cause he didn't --

17 A -- but I -- I could go to his page and see it,  
18 that's why I went to his page and looked.

19 Q And that's because you're friends with him?

20 A Right. That's because --

21 Q I understand.

22 A -- I was Facebook friends -- yeah, so I could  
23 view it.

24 Q So -- so -- so we're Facebook literate, this  
25 posting then never got approved -- so it never was ever

1 posted on the Community Patriots page?

2 MR. PERLMAN: Can you -- can you write that --  
3 can you reference which exhibit when you say that  
4 please?

5 THE COURT: 7.

6 MR. HAYSLETT: It's Exhibit 7. Exhibit 7 never  
7 got posted on the Community Patriots Pinellas  
8 Official page. 'Cause what it does, it goes to the  
9 queue -- I've got my own page -- it goes to the  
10 queue, you as the --

11 THE WITNESS: Right.

12 MR. HAYSLETT: -- administrator can either say  
13 approve or decline. It sits in that queue until you  
14 make one of those decisions. Approved, it gets  
15 posted, everybody in that group can see it. Until  
16 you approve it, they can't see it. The only people  
17 that can see it are the people who are  
18 administrators, correct?

19 MR. PERLMAN: Well, Judge, let me interrupt for  
20 a second.

21 THE COURT: Oh.

22 MR. PERLMAN: I just want to make sure the  
23 witness knows the difference between Exhibits 7 and 8  
24 so that she's clear in answering your question.

25 THE COURT: Okay.



1 MR. HAYSLETT: It's this one right here with  
2 the -- with the writing on the bottom with the  
3 restraining order.

4 THE WITNESS: Okay. And what's your question?

5 MR. HAYSLETT: My --

6 THE COURT: Hold on a minute.

7 MR. PERLMAN: Ms. Capes -- Ms. -- Ms. Capes, do  
8 you know which --

9 THE COURT: Hold on a second. I'm not sure  
10 we're even really clarifying it. Both of them were  
11 not posted on -- it's my understanding from the  
12 testimony that neither of them --

13 MR. HAYSLETT: Nothing was posted. That's  
14 correct.

15 THE COURT: -- were posted, so I don't even know  
16 if we need to -- I mean, it is the one where the  
17 injunction was there and there's the issue with the  
18 pictures, but it's my understanding from the  
19 testimony that neither of these attempted posts were  
20 ever published on the -- on the page.

21 MR. HAYSLETT: That's correct. And -- and --  
22 I'm sorry, what's her last name, Judge? I can't see  
23 it from here.

24 MR. PERLMAN: Capes.

25 MR. HAYSLETT: Tip?

1 THE COURT: Capes.

2 MR. HAYSLETT: Cates?

3 THE COURT: C-A-P-E-S.

4 MR. HAYSLETT: Capes. I'm sorry, Ms. Capes, I  
5 couldn't -- I can't see from here that far.

6 Q (By Mr. Hayslett) So neither Exhibit 7 -- or  
7 it's 7, 8, right?

8 THE COURT: Uh-huh.

9 Q (By Mr. Hayslett) Neither 7 and 8 never got  
10 posted on the Community Patriots Pinellas Official page,  
11 correct?

12 A Well, they did get posted, but I just declined  
13 them.

14 Q Well, and let's define what that means. It  
15 means it --

16 A Okay.

17 Q -- it got -- it got posted, but they can't see  
18 it until you check approve?

19 A Right. Right. Only the admins and the -- and  
20 the -- and the moderators can see it, yes.

21 Q So -- so --

22 A Or any of the people that were on -- that were  
23 friends with him could see it because it was on his page.

24 Q But that's a different issue. Let's stick --

25 A Oh, okay. Okay.

1           Q     Yeah. I'll get to that in a second. But on the  
2 page itself, these never got officially posted, meaning if  
3 I'm a member of the Community Patriots Pinellas Official  
4 page, and I'm not an admin, I never saw either of these?

5           A     No, I don't think so. Excuse me. I think I  
6 straight declined them. It -- it -- if on the first one,  
7 if it went through, I would have deleted it quickly. I  
8 don't remember on the first one if it got posted, then I  
9 deleted it, but the second one is straight decline. I  
10 just didn't put it through.

11          Q     So you don't know -- so we don't know whether  
12 either have got posted or it got immediately declined?

13          A     No. I believe -- I believe the first one and  
14 the second one got declined, but if there's -- if there's  
15 any doubt at all, the first one -- if someone else put it  
16 through, then I would have just deleted it.

17          Q     Got you.

18          A     Because see, if -- if -- if it cut -- it  
19 happened both, like, back-to-back. It was relatively  
20 quickly, within -- you know -- I don't know how soon, but  
21 I didn't know what was going on, so --

22          Q     Understand.

23          A     -- you know -- it was kind of like a -- I don't  
24 know -- it was kind of like a thing to spring on the  
25 page -- you know -- it was --

1 Q Understand.

2 A -- I don't know.

3 Q So in order to see either of these posts, you  
4 would have had to be friends with Mr. Braddock on  
5 Facebook?

6 A The second one, no. The second one is -- was  
7 marked public, so the second one anyone could see because  
8 it doesn't say content not available.

9 Q Got you.

10 A The first one, yes, you would have had to been  
11 friends with Mr. Braddock.

12 Q So the second one where -- you're talking about  
13 the second where it says Luna tried to take out all of her  
14 potential opponents -- including myself -- at once. That  
15 one everybody could see?

16 A Yeah.

17 Q Got you.

18 A Yeah. 'Cause he was just posting an article,  
19 was what he was doing, giving his synopsis of it.

20 Q Can I presume when you learned that Luna tried  
21 to take out her political -- her potential primary  
22 opponents, were you concerned for the safety of her  
23 opponents? When she tried to take him --

24 A Say that again?

25 Q When she -- when he posted Luna tried to take

1 out -- we're -- we're -- we're dealing with this word take  
2 people out. When he posted that he -- she tried to take  
3 out her potential primary opponents at once, did you  
4 interpret that she was attempting to do violence to them?

5 MR. PERLMAN: Judge, I -- I think we're outside  
6 the -- the scope of direct.

7 THE WITNESS: Uh.

8 MR. PERLMAN: Excuse me. And I -- I think the  
9 question is improper and argumentative because it's a  
10 statement not by Ms. Luna, but Mr. Braddock.

11 MR. HAYSLETT: I just want her interpretation,  
12 Judge. That's it.

13 THE COURT: Okay, and --

14 MR. PERLMAN: What Ms. -- what Mr. Braddock  
15 said?

16 MR. HAYSLETT: No, no. Her interpretation of  
17 this. She's the moderator of the -- of the page.

18 THE COURT: Right. So I'm going to overrule the  
19 objection because it is a reasonable person standard  
20 that we're going to be arguing when it comes to  
21 substantial emotional distress. So I'm going to  
22 overrule that objection.

23 Q (By Mr. Hayslett) When you read as an  
24 administrator that Mr. Braddock had posted, "Luna tried to  
25 take out all of her potential primary opponents", was --

1 did you interpret that Luna tried to kill them -- have  
2 them eliminated? Was that your take?

3 A I don't think I even went into thinking about  
4 it. I just was -- you know -- I mean, that's seconds  
5 after he posted the other thing --

6 Q I understand.

7 A -- so I was just trying to kind of figure out  
8 what was going on. I wasn't, like, trying to judge the  
9 situation, really, at that second. I was just like, whoa,  
10 whoa, whoa, what's going on? You know, first there was  
11 this -- you know -- this police report -- hand-written  
12 thing posted, and then -- you know -- so from my  
13 perspective, I was just trying to think, okay, don't --  
14 you know -- just don't mess with this. Let's find out  
15 what's going on.

16 Q Got you. So you weren't concerned for their  
17 safety at all?

18 A For whose safety?

19 Q The other opponents.

20 MR. PERLMAN: Objection, Judge. Misstates her  
21 testimony. She said she --

22 A I don't --

23 MR. PERLMAN: -- didn't review it.

24 A I don't think I was -- I wasn't, like, digging  
25 deep into it. I just was, like, okay, he's posting

1 another thing about this. What is going on here? What is  
2 the situation? What's happening? Like, it was something  
3 new happening in our -- you know -- in our community that  
4 he posted about, so I was just kind of like, hold on, hold  
5 on -- you know.

6 Q (By Mr. Hayslett) Makes sense.

7 MR. HAYSLETT: Nothing else. Thank you, Judge.

8 THE COURT: All right. Any redirect?

9 MR. PERLMAN: Real quick. Just so the record's  
10 clear --

11 THE COURT: Sure.

12 REDIRECT EXAMINATION

13 BY MR. PERLMAN:

14 Q Is Exhibit 7, which has the injunction petition  
15 information on the bottom -- it's your testimony that this  
16 screenshot was obtained by a -- a Facebook messaging that  
17 Mr. Braddock posted, correct?

18 A Yes.

19 Q Okay. Thank you.

20 MR. PERLMAN: That's all I have.

21 THE COURT: Okay.

22 THE WITNESS: Okay.

23 MS. JANES: Your Honor, just a -- just a couple  
24 of brief questions.

25 REDIRECT EXAMINATION

1 BY MS. JANES:

2 Q The discussion of whether you approved or  
3 declined Mr. Braddock's post has entirely to do with  
4 whether those posts were shared on the Community Patriots  
5 page. However, your declining them did not do anything to  
6 remove them from Mr. Braddock's Facebook page where they  
7 were available to anybody who was Facebook friends with  
8 him; is that correct?

9 A Yes, that would be correct.

10 Q Okay. And you have no way of knowing what other  
11 groups Mr. Braddock may have also shared his Facebook post  
12 to?

13 MR. HAYSLETT: Judge, I'm going to object to  
14 relevancy as to what other groups this got posted to.  
15 I mean how -- first of all, I don't think she can --  
16 she can testify to what other groups this went to, so  
17 the question was how does she know he didn't post  
18 this to other groups? I don't think she has the  
19 knowledge to--

20 MS. JANES: I'll withdraw -- I'll withdraw the  
21 question.

22 THE COURT: Okay.

23 Q (By Ms. Janes) And then with regard to Mr.  
24 Hayslett's attempts to give your impression regarding what  
25 it means to take someone out, would your interpretation of



1 that phrase depend on the context in which you heard it?

2 A Yeah. Definitely would.

3 Q Thank you.

4 MS. JANES: I -- I don't have anything further.  
5 Thank you so much.

6 THE COURT: All right. May this witness be  
7 released?

8 MS. JANES: Yes, Your Honor.

9 MR. HAYSLETT: Yes, Judge.

10 THE COURT: Okay. All right.

11 THE WITNESS: Thank you.

12 THE COURT: Mr. Perlman as well?

13 MR. PERLMAN: Yes, Judge.

14 THE COURT: Okay. Thank you, ma'am. Have a  
15 good day.

16 THE WITNESS: Thank you. You, too.

17 THE COURT: Okay. All right. Mr. Perlman, do  
18 you have any additional witnesses other than Ms. Luna  
19 potentially?

20 MR. PERLMAN: I -- I do, but I don't want to  
21 delay any further.

22 THE COURT: I can -- I -- I am available to  
23 stay, so I don't -- I don't have a little hourglass  
24 that the sand's run out on me. So --

25 MR. PERLMAN: Judge, may -- may I inquire of

1 counsel if he objects to the introduction of Exhibit  
2 10?

3 THE COURT: All right.

4 MR. HAYSLETT: I'm going to have to see what 10  
5 is. I don't -- what is -- what is 10?

6 THE COURT: On my exhibit list is the -- it's an  
7 article maybe. Oh, wait, no. Braddock postings  
8 regarding Sung.

9 MR. HAYSLETT: Braddock's postings regarding  
10 what? I'm sorry.

11 THE COURT: Sung. S-U-N-G. The gentleman -- he  
12 was here. Mr. Sung.

13 MR. HAYSLETT: Oh. Let me see which one. 10,  
14 3, whatever. I don't see 10 here. Judge, can I look  
15 at your 10 real quick?

16 THE COURT: Sure. Well, I'm not sure. Okay.  
17 'Cause it's still in there. Okay.

18 MR. HAYSLETT: No, I -- I don't, Judge.

19 THE COURT: Okay. So there's no objections from  
20 Mr. Hayslett as to introducing Exhibit Number 10.

21 MR. PERLMAN: Well, that makes things shorter.

22 THE COURT: Okay.

23 MR. PERLMAN: With Exhibit 10 being introduced,  
24 Judge, I just want to publish it for Your Honor.

25 THE COURT: Okay.

1           MR. PERLMAN: Give -- give me a second to pull  
2 it up. And I don't know if Mr. Sung is in the  
3 waiting room, but I'd like to reach out to him and  
4 let him know he's being excused as well.

5           THE COURT: That's fine. He -- I believe -- is  
6 no longer in the waiting room. But he was here at  
7 one point.

8           MR. PERLMAN: No? Okay. Fair enough. The next  
9 exhibit -- hold on. Okay, so Judge, Exhibit 10 is a  
10 message exchange between Mr. Sung and Mr. Braddock,  
11 and this is Mr. Braddock who's circled, and for the  
12 record, he is writing to Mr. Sung, and I'll just read  
13 it aloud. I apologize for the superlative, but,  
14 "Bro, you're so goddamn lucky you don't live near me,  
15 or I'd fucking make your retarded ass disappear."  
16 So --

17           THE RESPONDENT: Mr. Hayslett?

18           MR. PERLMAN: Not --

19           THE RESPONDENT: Your Honor, if I may object to  
20 that. This did not occur in U.S. jurisdiction, so I  
21 just really don't know what relevance this has to the  
22 case?

23           MR. PERLMAN: I'm not sure who's talking, but  
24 Judge, that -- the last page of the exhibit is a  
25 picture of Mr. Braddock brandishing a couple weapons,

1 and I just wanted to -- again -- publish that for  
2 Your Honor.

3 THE COURT: Okay. All right. Well, Mr.  
4 Braddock, your attorney has indicated that he does  
5 not have an objection. So.

6 MR. HAYSLETT: Judge, I guess the issue of  
7 these, I'm going to object. Relevance, number one.  
8 Predicate, number two. Time, number three.  
9 Authentication, number four.

10 THE COURT: All right. So that sounds like you  
11 do need to call Mr. Sung if you want to have these  
12 moved into evidence. I think that Mr. Hayslett  
13 has --

14 MR. HAYSLETT: Just as to the one screenshot.  
15 Not as to these photos.

16 THE COURT: Hold on. There's three pages, I  
17 think, of this exhibit. Right? Oh, no. Hold on a  
18 second.

19 MR. PERLMAN: You're' right.

20 THE COURT: Okay. So I don't know if you  
21 realized that -- that these --

22 MR. HAYSLETT: I -- I just saw the first page.  
23 I didn't see the other two, Judge.

24 THE COURT: Okay. So the other two pages that  
25 deal with -- I guess -- some other posts --

1 MR. PERLMAN: Well, Judge, that's -- I can live  
2 with the first page. We'll -- we'll exclude the  
3 rest.

4 THE COURT: Okay. Well, and here's my question  
5 about the second -- all right. So just the first  
6 page?

7 MR. PERLMAN: Yes, ma'am.

8 THE COURT: And so I guess when I'm looking at  
9 these numbers here, I -- I guess my only question is  
10 do we know when this occurred? 'Cause the second  
11 page says July of 2019, so I'm just trying to find  
12 out if this is a -- a statement that was made in the  
13 timeframe we've been talking about all day, like,  
14 this year, or this was something from 2019?

15 MR. PERLMAN: My understanding, Judge, is that  
16 it predates the -- the timing that we've been talking  
17 about with regard to this case.

18 THE COURT: By like, two years? Or by like --

19 MR. HAYSLETT: Judge --

20 THE COURT: -- six months?

21 MR. HAYSLETT: If it's two years, it's --

22 MR. PERLMAN: I -- I -- I don't know the answer.  
23 The -- the point was, obviously it's -- it's relevant  
24 to the extent your Court -- the Court is concerned  
25 about whether or not -- you know -- this is behavior

1 of Mr. Braddock that he exhibited between -- with  
2 regard to the two petitioners and anybody else. And  
3 on that, I think it's permeative. Whatever weight  
4 you give it -- you know -- Your Honor will determine.  
5 But I -- I don't know -- I don't know the date to be  
6 able to respond more clearly. So for that, I  
7 apologize.

8 THE COURT: All right.

9 MR. HAYSLETT: Well, Judge, I -- I -- if it's  
10 2019, then I would object, Judge.

11 THE COURT: Okay.

12 THE RESPONDENT: Your Honor, not only does it  
13 violate the past two years clause, it's also out of  
14 U.S. jurisdiction.

15 THE COURT: Okay, well --

16 THE RESPONDENT: This is William -- William  
17 Braddock, by the way.

18 THE COURT: Yeah, Mr. Braddock, whether  
19 something was posted on the moon or not doesn't  
20 necessarily mean it can't be brought in -- thanks to  
21 social media and everything. So if something's being  
22 offered to be introduced into evidence, it needs to  
23 just be authenticated, and to be properly  
24 authenticated -- whether a video was taken out of  
25 state or in state -- but what I really need to find

1 out is -- I guess my question is -- I -- I know that  
2 you guys are trying to streamline this and not call  
3 this witness to identify this feed or whatever. But  
4 my question is, is that do we have any information  
5 that Ms. Luna or Ms. Olszewski even ever has seen  
6 this?

7 THE RESPONDENT: Negative. Also, I just moved  
8 back to the United States August 2020 --

9 THE COURT: No, no. Mr. Braddock -- Mr.  
10 Braddock, hold on a second. How would you know if  
11 Ms. Olszewski or Ms. Luna had ever seen this post?  
12 Okay. So let me ask the two attorneys if we know --  
13 like, am I going to hear testimony that one of these  
14 two parties that I am trying to understand their  
15 perspective and sequence of events has ever viewed  
16 this post where apparently there was a banter back  
17 and forth between Will in the U.S.A., and some other  
18 people.

19 So how is this not collateral? Like, how is  
20 this relevant to this situation? I mean, if you can  
21 tell me I'm going to hear testimony that Ms. Luna and  
22 that Ms. Olszewski viewed this and have seen this and  
23 this contributed to the situation, then I -- I'm  
24 considering it. But if you're not -- if I'm not  
25 going to hear anything like that; he could threaten

1 everybody out there and it doesn't necessarily give  
2 Ms. Luna and Ms. Olszewski a basis to get an  
3 injunction. So I guess -- you know -- I hear a lot  
4 of times in injunction hearings, well, after the fact  
5 I found out he's -- you know -- been to prison for  
6 murder, but that really doesn't change that. Or, oh,  
7 he -- I've seen him -- you know -- I've -- you  
8 know -- I heard he threatened other people in the  
9 past or he's threatened other people in the past, but  
10 that doesn't necessarily -- unless Ms. Luna and Ms.  
11 Olszewski are going to tie this in that they had  
12 knowledge of this or -- or saw this, then I'm going  
13 to be excluding it on relevance grounds.

14 MR. PERLMAN: Judge, I can tell you that this  
15 was provided to Ms. Luna. I -- I think it may have  
16 been subsequent to the filing of the petition, but I  
17 think it also contributes to her basis for --

18 THE COURT: Okay, so it sounds like that this  
19 might be able to be tied in through Ms. Luna. So I  
20 don't even know if it matters on Mr. Sung's thing if  
21 Ms. Luna's going to testify as to her -- something  
22 about this, whether it's true or it's not true --  
23 or -- or whatever, then I -- I think that I will  
24 consider that when you move it in for Ms. Luna.

25 MR. PERLMAN: Okay. Fair enough.



1           THE COURT: All right. Anything else that we  
2 could address? Or are we ready for Ms. Luna? Or do  
3 we need another comfort break? How late are you guys  
4 planning on going? Are we -- I mean, it seems  
5 like -- I mean, I go late, but some people have  
6 childcare issues. Some people have timing issues.  
7 Some people have evening commitments. We were only  
8 scheduled till 3:00. I am more than willing to go  
9 later. I just need to know one -- how late we're  
10 going to go if we're going to go, and/or if we're  
11 even going to finish tonight. So I guess -- let me  
12 just ask.

13           It would be my intention to at least get Ms.  
14 Luna's testimony on today, and then -- I don't know  
15 how long that's going to take. I would assume that  
16 the longest witness was probably Ms. Olszewski  
17 because of the amount of information that -- or maybe  
18 I shouldn't assume. But anyways -- so how late are  
19 we going to go? So --

20           MR. PERLMAN: Judge, your -- from my estimate,  
21 your intuition was correct. I don't think Ms. Luna's  
22 going to be nearly as long as Ms. Olszewski.

23           THE COURT: Okay.

24           MR. PERLMAN: And then -- you know -- we have  
25 Mr. Braddock, but I think -- I think we could finish

1           today. I would hope that we could finish before  
2           5:30, and whatever time Your Honor provides is -- is  
3           what we'll work with. Obviously, if someone has a  
4           conflict -- you know -- we'll try and deal with it.  
5           But I know the petitioners are anxious to try and  
6           close the evidence today, and -- you know -- maybe we  
7           have to circle back for legal argument, what have  
8           you.

9           THE COURT: Okay. Well, that is somewhat  
10          compelling; however, I do know that if it gets  
11          continued, the temporaries remain in full force and  
12          effect. So I'm not going to limit the respondent's  
13          case in order to -- to squeeze it in today. So let  
14          me ask Mr. Hayslett -- you know -- it may be that Mr.  
15          Braddock would be a short witness for the  
16          petitioners -- or I don't know. But obviously, I  
17          don't know what you would anticipate, and I don't  
18          know what you anticipate as to cross-examination of  
19          Ms. Luna.

20          MR. HAYSLETT: Judge, I -- I -- I'd pursuit --  
21          I'd prefer to keep going. If we could take about 10  
22          minutes.

23          THE COURT: Well, I'm going to keep -- we're --  
24          we're going to keep going, but --

25          MR. HAYSLETT: Well, I mean, keep -- keep going

1 and -- and -- and maybe look, see where we are at  
2 5:30 or 6.

3 THE COURT: Okay. Okay.

4 MR. HAYSLETT: Can we take about five minutes  
5 before we start Ms. Luna?

6 THE COURT: I have no problem. Is that your  
7 next witness, Mr. Perlman?

8 MR. PERLMAN: Yes -- yes, ma'am.

9 THE COURT: Okay. So we'll come back at 4:25,  
10 and we will start with Ms. Luna, and we'll see how  
11 far we can get today. Obviously, everybody sounds  
12 motivated to keep it short and sweet -- or at least  
13 stay to the point. So we'll see everybody at 4:25.

14 MR. PERLMAN: Thank you, Judge.

15 THE COURT: Thanks.

16 (Recess.)

17 THE COURT: All right. We are back. Let me  
18 see. Ms. Janes, can you hear me? All right. I saw a  
19 nod.

20 MS. JANES: Yes, Your Honor.

21 THE COURT: Mr. Perlman, can you hear me?

22 MR. PERLMAN: Loud and clear, judge.

23 THE COURT: All right. Ms. Pualina, can you  
24 hear me?

25 MS. LUNA: Yes.

1 THE COURT: Okay. Ms. Olzewski, can you hear  
2 me?

3 MS. OLZEWSKI: Yes, I can, Your Honor.

4 THE COURT: All right. Mr. Braddock, can you  
5 hear me?

6 MR. BRADDOCK: Yes, ma'am.

7 THE COURT: All right. All of the people that  
8 need to hear me can hear me.

9 So all right, Mr. Perlman, are you calling Ms.  
10 Luna next?

11 MR. PERLMAN: I am, indeed.

12 THE COURT: Okay. All right. Ms. Luna, could  
13 you raise your right hand.

14 THEREUPON,

15 ANNA PAULINA LUNA,

16 the witness herein, having been duly sworn, was examined  
17 and testified as follows:

18 THE COURT: Okay. You may inquire, Mr. Perlman.

19 MR. PERLMAN: Thank you.

20 DIRECT EXAMINATION

21 BY MR. PERLMAN:

22 Q Can you please state your full name for the  
23 record?

24 A Anna Paulina Luna.

25 Q And are you the petitioner in this case, seeking

1 an injunction against respondent Braddock to prohibit him  
2 from harassing you?

3 A I am.

4 Q Okay. And can you tell the Court a little bit  
5 about yourself? Were you -- did you serve in the  
6 military?

7 A Yes. I'm an Air Force veteran and I'm also  
8 running for congress in Florida's 13th congressional  
9 district. In my private capacity I'm an author and I have  
10 a media consulting company.

11 Q Okay. And you received an honorable discharge  
12 from the Air Force?

13 A Yes.

14 Q Okay. And is my understanding correct that your  
15 husband is an active member of the military at a base in  
16 Florida and is the recipient of the Bronze and Purple  
17 Heart medals?

18 A My husband is a member of the Air National  
19 Guard, so his service is still active. But yes, he is  
20 also a recipient of a Bronze Star and Purple Heart.

21 Q Okay. Well, thank you both for your service.

22 Explain to the Court how you first came into contact  
23 with Mr. Braddock.

24 A I actually first heard about William Braddock  
25 from Audra Christian. I didn't have any direct

1 interaction with him until he stopped me out on two  
2 separate occasions on May 25th.

3 Q And what was going on on May 25th? And was this  
4 2021?

5 A Yes, this was of this year, May 25th of this  
6 year. On that day, earlier that day I had actually been  
7 on a radio segment for local radio and William Braddock  
8 had phoned into that call in order to talk to me directly.

9 Prior to that, Ron Ogdon, who is a radio host, had  
10 actually -- I believe he emailed me earlier that morning  
11 to let me know that I guess William Braddock had called in  
12 to see if that was still happening. And then, later on he  
13 phoned in and then later on that evening is when William  
14 Braddock sought me out at Community Patriots and actually  
15 physically wanted to have some form of interaction with  
16 me. At this point in time, I was really already on edge  
17 around him because of the things that multiple people had  
18 come forward to tell me, warning me about him. And so at  
19 that point in time, I actually broke interaction with him  
20 and tried to avoid the situation completely.

21 Q Okay. Let's go back for a moment at this later  
22 event on the, I think, 25th. Were you a speaker, a  
23 presenter, or an attendee?

24 A I was actually attending, but I did attend with  
25 one of our friends. So my husband was there and one of

1 our other friends as well, who was speaking. And so they  
2 allowed me to introduce him. It was not a candidate forum  
3 at all.

4 I know earlier, during the whole, I guess, initial  
5 introduction to this case, that's what -- I think his  
6 name's Kevin; that's what Kevin had said. It was not a  
7 candidate forum at all.

8 Q Okay. And the -- the physical interaction you  
9 had with Mr. Braddock at that time, can you explain to the  
10 Court, did -- did he sort of block your path where you  
11 were walking from one point to another point? What --  
12 what were the circumstances?

13 A I was walking to the stage and he, I guess, had  
14 saw me coming. I had an idea of what he had looked like  
15 because Audra gave me a heads-up on his description, but  
16 it wasn't until he actually literally blocked my path to  
17 where I was walking and introduced himself and wanted me  
18 to know that he had phoned into the radio station.

19 And I absolutely freaked out at that point. I just  
20 wanted to get away with him. I didn't know what he was  
21 going to do. Frankly, I thought that at this point in  
22 time, he was obviously a very angry, unstable person that  
23 clearly hated my guts and wanted to hurt me. So I  
24 literally got away from him as fast as I could and broke  
25 interaction with him.

1 Q And at this point, had you heard from others, in  
2 addition to Audra, in terms of the communications, if you  
3 will, that we've put into evidence today and the witnesses  
4 testified about, with regard to Mr. Braddock and yourself?

5 A I believe it was Audra and Amanda who initially  
6 started telling me and warning me about him.

7 Q Okay. And prior to filing the petition, you  
8 heard from others as well, consistent with what the  
9 witnesses testified to earlier today, correct?

10 MR. COX: Objection as to leading, Judge.

11 THE COURT: Well, there's -- sustained.

12 Q (By Mr. Perlman) Who -- who else contacted you  
13 with regard to communications they had with Mr. Braddock  
14 that related to you?

15 A I was not --

16 Q Go ahead.

17 A Sorry. I was contacted in total by Audra  
18 Christian, Amanda, R. (phonetic) Mackwell, Brad DeMint,  
19 and Cliff Gaffhardt (phonetic) as well. And then, also  
20 Erin, after the phone call happened.

21 Q Okay. What about Mr. Sung? did Mr. Sung ever  
22 reach out to you?

23 A Yes, Mr. Sung had actually contacted my campaign  
24 and emailed us shortly after William Braddock had posted  
25 the injunction to his Facebook page, which resulted in the



1 Tampa Bay Times writing the first assuming news story,  
2 without having all the facts. And at that time, Sung  
3 actually gave my campaign information in regards to  
4 William Braddock's correspondences with him and he also  
5 submitted that same information, to my understanding, to  
6 the Tampa Bay Times, at which the Tampa Bay Times wrote  
7 and published an article as well.

8 Q Okay. And the -- the exhibit that we talked  
9 about earlier, with regard to Mr. Sung and Mr. Braddock,  
10 do you know if that is an accurate depiction of what it  
11 purports to be?

12 A Yes, it is.

13 Q Okay. Now, you've -- other than the experience  
14 at the radio event, where you explained he intentionally  
15 sought you out, and then the in-person event later that  
16 day, in which he physically interrupted your walking  
17 pattern to introduce himself, you've never spoken to him  
18 outside of those two, correct?

19 A Negative. I've never met him a day in my life,  
20 aside from that.

21 Q Okay. You've never spoken with him or had a  
22 chance exchange with him, correct?

23 A Correct.

24 Q Okay. So as this information is being provided  
25 to you by the various individuals you named, Audra

1 Christian, Brad DeMint, Amanda Capes, and Arthur Mackwell,  
2 what -- what is going on in your mind at that time?

3       A       I mean, I deal with a lot of people every single  
4 day, and so I have a pretty good gauge on when people are  
5 maybe just having bad days or maybe they just don't like  
6 me. But what set this apart was how aggressive and  
7 intentional this man was being to not only seek me out  
8 and, you know, seek people that were affiliated with me  
9 out, but the fact that he was essentially targeting me.

10       So to add onto this, also, I was told during this  
11 time period that he actually contacted members of, like,  
12 staff that I have on my campaign, to include my  
13 consultant, to include people that I've filmed with, to  
14 include him sending in text messages and actual attempts  
15 for him to actually get my contact information to contact  
16 me directly. So I started getting very afraid of him.

17       Ultimately, what ended up happening is I really did  
18 start -- I didn't know what to do with it. I mean, what  
19 are you supposed to do when you receive that type of  
20 information? So I did talk to my husband about it. I was  
21 talking to some close friends about it, in regards to what  
22 I should do. But it was such a confusing time at that  
23 point in time, I just -- I mean, what do you do with that  
24 information? It was horrifying and it still is.  
25 Emotionally, I'm exhausted.

1 Q Understood. And -- and to what degree were you  
2 concerned when these individuals told you that Mr.  
3 Braddock was commenting about where you live and comings  
4 and goings of your residence?

5 A Very concerned, mainly because, I mean, my  
6 husband travels for work. And obviously, you know, I'm  
7 kind of a smaller person. And so for me, I didn't just  
8 take that as someone who you -- is your average Joe just  
9 talking, you know, smack because he doesn't like me. I  
10 took that as an immediate violation of my privacy and  
11 of -- also my home address, for him to be telling it to  
12 people on multiple, different occasions -- people that he  
13 may not have even known had any affiliation with me. I  
14 thought that he was talking himself up to do something  
15 very bad and I later on found out that I was right, when  
16 he was talking about murdering me.

17 Q So earlier, when we introduced Exhibit 6, which  
18 was an exchange between Braddock and Mr. DeMint and  
19 Braddock wrote that he was going to take out Luna, no  
20 questions asked, did that sound like a political campaign  
21 aspiration or as something different?

22 A It sounded different. And what especially made  
23 me feel like he was going to hurt me is because of the  
24 fact that he calls me a cunt in the same text message.  
25 You know, when people are talking about politics -- and I

1 understand that, you know, he might have different  
2 political ideologies than other people -- you don't ever  
3 resort to violent language and you don't ever talk about  
4 people the way that he talks about women in particular,  
5 which I find very disturbing.

6 Q And prior to the June 8th call, which we'll get  
7 into in a second, had you had any formal or informal  
8 authorities with any -- I'm sorry -- any formal or  
9 informal communications with any friends or authorities,  
10 in terms of what you should be doing at this point?

11 A Yes, I spoke to, actually, a couple people. And  
12 because of the fact that this individual was, I think, at  
13 the time a declared candidate leading up to this, I think  
14 he had declared around -- I don't -- it was within a  
15 window of -- like, it was such a fast window.

16 But I told my team in particular because I've never  
17 had to deal with a violent candidate like this, and so I  
18 didn't know what to do. So I actually showed my campaign  
19 manager some of the texts that Audra was sending me. And  
20 I also -- you know, I talked to my mom about it. I  
21 definitely showed my husband because obviously, he spends  
22 the most time with me and I felt like this guy is going to  
23 try to get violent.

24 Q Did you also have discussions with Tara -- Erin  
25 with regard to your safety?

1           A     Erin actually -- and I, leading up into the  
2 phone call really didn't have a very close friendship. We  
3 were acquaintances. And so we weren't really chatting on  
4 a regular basis.

5           Erin called me to kind of give me a heads-up that he  
6 was a little bit weird, but it wasn't until the day of the  
7 phone call that she was, like, you absolutely need to call  
8 the cops. He's going to try to murder you. And at that  
9 point in time, I mean, she was able to go into detail  
10 about some of the stuff that he was saying and in addition  
11 to everything else that I was hearing from multiple  
12 people, at that point in time, I definitely felt in fear  
13 of my life, and that's why I called the cops.

14          Q     And did you have that same fear after this  
15 information was shared with you earlier about Mr. Braddock  
16 knowing where you reside and suggesting he was going to  
17 take you out, no questions asked, and using the derogatory  
18 terminology with regard to you?

19          A     Yes, I did.

20          Q     Okay. So there was a -- I'll just refer to that  
21 as the -- the first incident. There -- there was a second  
22 incident on June 8th, correct?

23          A     In regards to the phone call, I believe. Did  
24 you -- do you mean the first incident as in him trying to  
25 make contact with me twice on the same day as the first

1 incident?

2 Q No. I was referring to -- fair -- fair enough.  
3 So after the double contacts on, I think you said, May  
4 25th that we have these communications through your  
5 friends and colleagues who put you on alert, which you had  
6 said gave you concern for your safety, correct?

7 A Correct.

8 Q Okay. So now, we've got a third incident, which  
9 is the June 8th phone call that Erin testified about,  
10 correct?

11 A Correct.

12 Q Okay. Can you describe to the Court what  
13 transpired that evening? I guess you could start when  
14 Erin had given you a call.

15 A So I was basically asleep and it was about maybe  
16 midnight-thirty, 12:30, when I got a phone call from Erin.  
17 And to be honest with you, she was completely frantic. It  
18 sounded like she was about to cry, and so I had to calm  
19 her down for a minute. And then, obviously, like, me  
20 being, you know, kind of half awake, I was able to kind of  
21 get out of her that she had just gotten off the phone call  
22 with William Braddock and that he was talking about how he  
23 was going to have me murdered and that he had requested --  
24 or that he had access to people that he would call and  
25 that he would request photos of me disappearing --

1 MR. COX: Judge -- Ju-ju-ju-judge --

2 A -- that he had referred to me as a dead --

3 MR. COX: -- objection. I'm -- I'm objecting as  
4 to --

5 THE COURT: All right.

6 A -- some rodent.

7 MR. COX: -- as hearsay. All this is hearsay.  
8 These were statements that Olzewski told her.

9 THE COURT: Okay. I'll overrule it. I think  
10 it's being used for the effect on the listener, not  
11 as to the veracity of them.

12 Okay. Go ahead.

13 A At that point in time, I actually woke up my  
14 husband and then I asked her to kind of repeat it. I  
15 didn't know what to do. And so she told me I needed to  
16 call the cops. I told her to do the same thing. And at  
17 that point in time, I called the St. Petersburg Police  
18 Department.

19 Q And what happened next?

20 A They came to my house. They were at our house  
21 until probably about 4 o'clock in the morning, maybe 4:30  
22 in the morning. They put cops out in front of my house  
23 and we handed over every single piece of evidence that I  
24 had, every single text message that I had received, it  
25 went to them.

1 Q What -- was it ever explained to you during  
2 those communications -- bless you, bless you, whoever that  
3 was -- that -- that Mr. Braddock was only going to kill  
4 you if you were winning in the polls?

5 A Mr. Braddock had stated and I actually didn't  
6 hear the phone call until later on, after law enforcement  
7 had gotten there and af -- actually, the first time, we  
8 actually sat down and heard it was with law enforcement.  
9 He did specify in that phone call that he would kill me --

10 MR. COX: Judge -- Jud -- jud -- Judge -- Ju-  
11 judge --

12 A -- or that he would have me killed. And --

13 THE COURT: Hold on. Hold on a second.

14 MR. COX: Judge, I'm -- I'm going to object. I  
15 guess is this her listening to the tape that -- as I  
16 believe the Court's information was that Ms. Olzewski  
17 could testify about the conversation --

18 THE COURT: Um-hum.

19 MR. COX: -- because she heard it. Now the  
20 testimony is that she listened to it and she's going  
21 to testify to the contents of the tape?

22 MR. PERLMAN: Judge, I think -- let me just  
23 clarify. Can -- limit your testephone -- testimony,  
24 Ms. Luna, to the conversation you had with Ms. Erin  
25 please, okay?



1           A     Erin told me that he was going to murder me and  
2 that I needed to call the cops.

3           Q     Okay. And did she say at that time that Mr.  
4 Braddock was going to kill you only if you were leading in  
5 the polls?

6           A     No.

7           Q     And as silly as that may sound, if someone said  
8 that to you, would it provide any comfort to you with  
9 regard to your concern for your safety and well-being?

10          A     Absolutely not because I'm currently leading the  
11 polls. I've always been leading in the polls. And  
12 especially now, it's even of more concern because of the  
13 fact that I just received an endorsement that is very  
14 important for any race, and it makes me the frontrunner  
15 for a congressional seat. So yes, I find it extremely  
16 disturbing because under no circumstance would I ever be  
17 second in polling.

18          Q     And why did you notify the authorities after  
19 Erin related the phone call June 8th to you?

20          A     Erin called me practically in tears. I -- up  
21 until this point, I knew her, but we weren't close. And I  
22 knew that something bad had happened. I've obviously been  
23 receiving text messages from multiple people about this  
24 guy and ultimately, I didn't at that point know really  
25 what to do. I was still trying to kind of figure that

1 whole thing out. I was trying to google how to handle,  
2 you know, a potential murderer or a potential, you know,  
3 murder plot or someone that's talking about, you know,  
4 watching people leave your house. I mean, I just didn't  
5 know what to do.

6 At that point in time, I kind of didn't care anymore.  
7 I just wanted to get cops involved as soon as possible  
8 because I feel that this man is generally a threat.

9 Q And when you say "a threat", you mean for the  
10 safety of your life?

11 A Yes, I think that he is going to try to hurt me  
12 and I think that he would try to hurt people around me  
13 because I think that he's an evil person.

14 Q Okay. And when -- when the phone call was  
15 relayed to you that evening by Erin and based on these  
16 other events that you testified about, how -- how did that  
17 effect you?

18 A I can tell you that I did not sleep at all that  
19 night and since then, I've actually had significant issues  
20 sleeping. It's very hard to go anywhere by myself. And  
21 although I have the injunction paperwork, I do feel that  
22 William Braddock has not respected that. I think that he,  
23 on multiple occasions, has tried to use social media  
24 outlets in order to contact me and/or made attempts to  
25 publicly defame and intimidate me during this entire

1 process. And I think that he's also had other people do  
2 it as well. And it's caused emotional distress to the  
3 point of I've actually had to pause doing -- sorry, it's  
4 an intense topic. I would have to pause doing --

5 Q Take your time. Take your time. You're doing  
6 well.

7 A This man has put me through emotional hell. I  
8 think that he's evil. I've had to pause doing fertility  
9 treatments with my husband and I think that anyone  
10 defending him is a bad person.

11 Q And how did -- how did it affect you to that  
12 level? What was the cause of that?

13 A I think you're looking at it right now. I think  
14 that he has definitely emotionally terrorized me and  
15 definitely caused significant emotional trauma to my  
16 family. I think that no one in their right mind would  
17 ever hear the statements that he made about their daughter  
18 or their sister or their mother and think that these are a  
19 normal way to treat someone. And I think that it's  
20 especially alarming that his comments are so misogynistic  
21 and destructive and just -- there's no value of life.  
22 It's almost like a sociopathic behavior. It severely  
23 traumatized me.

24 Q Have these multiple actions directed at you  
25 effected your level of stress?

1           A     Significantly.

2           Q     In which direction?

3           A     Which is why -- which is why I had to pause  
4 doing what I was doing. Cortisol levels are very, you  
5 know, important in -- especially medically for what I was  
6 doing and there was no way that we could proceed, given  
7 the circumstances.

8           Q     Now, you testified that it's also effected your  
9 sleeping. What about any eating habits?

10          A     Yeah, I actually lost about, I would say, six  
11 pounds early on. And obviously, you know, even the entire  
12 day today, knowing that I had to talk about this and that  
13 I would likely, you know, have to put something so  
14 personal out there, I haven't even eaten all day today. I  
15 have just been waiting for this to be over.

16          Q     And did you make any changes in terms of your  
17 lifestyle? Did you dial down what you would ordinarily  
18 consider normal activity? Let -- let's start with that.  
19 Did you achie -- did you alter any of your standard  
20 actions as a result of this conduct by Mr. Braddock,  
21 starting on June 9th?

22          A     Yeah, actually. So part of what my day job is  
23 is that I work online. I work in media. And I did not do  
24 that for, I want to say, maybe about two weeks. I've also  
25 paid out of pocket personally to hire private security.

1 I've now made sure that all members of my campaign at our  
2 events coordinate security prior. It's been expensive.  
3 It's been time-consuming. I've made certain strategic  
4 decisions in regards to security at my home. And I can  
5 tell you that it has been an impact not just on myself,  
6 but also my husband as well because his work as a member  
7 of the military has had to be notified and it has impacted  
8 his job as well.

9 Q We had talked about Exhibit 7 with Ms. Capes,  
10 and this was the -- the Facebook posting. Were you tagged  
11 in that posting?

12 A He actually -- if you can just put it up real  
13 quick because I don't have it in front of me.

14 Q Sure, give me a second or -- or two. Okay.  
15 This has been pre-marked as Exhibit 7. Were you tagged in  
16 this Facebook posting by Mr. Braddock?

17 A William Braddock writes my name and he's  
18 actually directly -- if you can see this posting --  
19 talking to me. This was this exact same posting that he  
20 submitted to the Community Patriots, which is a group I'm  
21 a part of.

22 Q So you -- you said he's talking to you because  
23 he writes thanks -- "thanks Luna"? He's talking to you?

24 A He goes "Thanks, Luna the Lunatic. You" --  
25 meaning he's talking to me -- "just solidified the fact

1 that you're mentally not stable enough to serve and helped  
2 my name recognition. Thanks for that". So he's talking  
3 directly to me. He also references my name.

4 Q And he's -- he's attaching your petition for an  
5 injunction filed in this case; is he not?

6 A Correct. And I had actually never even told  
7 anyone outside of the law enforcement. My husband --  
8 obviously Erin knew about and, you know, my team clearly  
9 knew about it because I'm a candidate for congress and  
10 this guy was talking about murdering me.

11 Q And he indicates that -- he alleges that you  
12 filed a false police report, triple exclamation. Do you  
13 see that right above it?

14 A Yes.

15 Q Okay. Ha -- has anyone -- any authority advised  
16 you that the police report was false?

17 A No. I've never filed a false police report.

18 Q Okay. Do you remain today concerned over your  
19 physical safety and well-being with regard to Mr.  
20 Braddock?

21 A Yes, and I think actually during this court  
22 hearing, even seeing what happened to Erin just furthers  
23 my feeling that this man does not respect authority and  
24 that he thinks that this is a joke, in his words childish,  
25 and because of that, I do fear that he still will try to

1 hurt me.

2 MR. PERLMAN: Just give me a second, Judge --

3 THE COURT: Okay.

4 MR. PERLMAN: -- while I just check my notes.

5 Q (By Mr. Perlman) Mr. Mackwell also shared with  
6 you his communications he had with Mr. Braddock, correct?

7 A Correct.

8 Q And what did he tell you?

9 A He told me that he had been approached by  
10 Braddock at a barbeque; that Braddock was with Matt Tito  
11 and that he had told him that Braddock had stated my  
12 address, so where I live street address-wise. And he said  
13 that Braddock had also told him that he observed people  
14 leaving my house. And the reason why Art was telling me  
15 is because he was really disturbed by that. And  
16 obviously, given the context of everything that had  
17 happened, he felt that I should know for my personal  
18 safety because he felt that this pershin -- person was  
19 going to try to hurt me.

20 Q And so from the other text provided by Audra and  
21 now this information from Mr. Mackwell, were you concerned  
22 that Mr. Braddock was somehow surveying your home  
23 residence?

24 A Yes, and also to the thing that really disturbed  
25 me is that my house backs up to an alley and that's really

1 the only way -- we pretty much run into a Popeyes chicken.  
2 I mean, I also live near a 7-Eleven and he didn't state  
3 that. So that part in particular made me feel like he had  
4 driven by my house; that he had watched my house and that  
5 he knew about that alley.

6 Q Is there anything else that you think that the  
7 Court needs to know in connection with your request for  
8 the injunction today?

9 A I would not have filed this if I did not feel  
10 that I was in fear of my life. And part of the reason why  
11 I did not go to authorities sooner is because I honestly  
12 didn't know how to tell authorities that I felt like  
13 someone was going to kill me or that -- even how this  
14 process goes, in regards to the type of things that he was  
15 saying.

16 And so I understand that it might not be up to par  
17 with other people's standards, but again, I don't know  
18 many people that have actually had brave people come  
19 forward like Erin, risking a third degree felony, to say  
20 that this man was going to try to kill me. And so I'm  
21 very thankful that those people that came forward and I  
22 think that he needs to just stay away from me permanently.

23 MR. PERLMAN: Okay. I don't know if Ms. Janes  
24 has anything.

25 THE COURT: Okay. Ms. Janes?



## 1 CROSS-EXAMINATION

2 BY MS. JANES:

3 Q I've got just a few brief questions, Ms. Luna.  
4 And -- and thank you for your -- your patience. I just  
5 want to get a couple things -- discuss a couple things  
6 relating to Ms. Olzewski with you. Because you spoke to  
7 her -- you were the first person to speak to her after her  
8 conversation -- excuse me -- you were the first person to  
9 speak to her after her conversation with Mr. Braddock,  
10 early on the morning of June 9th. And now I want to make  
11 sure we're clear on the record of -- of what your  
12 impression was of her emotional state at that time,  
13 immediately after she spoke to Mr. Braddock.

14 A She was completely distraught. I could tell. I  
15 don't know if she was crying or that she was just so  
16 shaken up that it sounded like she was going to cry, but  
17 she was clearly scared for her life and scared that he was  
18 going to hurt me and that it was only a matter of time --

19 Q And --

20 A -- as well as -- as well as, from what I  
21 gathered, her -- because of her state.

22 Q And did it seem to you that her emotional  
23 distress was just completely genuine?

24 A I think that it was absolutely genuine. And I  
25 think that if anyone ever heard the phone call and all

1 thirty-three minutes of it, I can tell you that I only had  
2 the stomach to hear it once because of how awful it is. I  
3 mean, the man's talking about requesting photos of me  
4 disappearing, he's having -- talking about people shooting  
5 me at close-range proximity. I mean, it's really  
6 disgusting. It's like this guy's fixated on death.

7 I think that if I were her, I would also be scared  
8 out of my mind and I think that in general, it's only a  
9 shame that people came here today because I think that if  
10 you were able to, you would absolutely, no questions  
11 asked, be in our same situation now, asking the Court to  
12 grant permanent restraining orders against this man.

13 MS. JANES: Thank you, Ms. Luna.

14 THE COURT: (Unintelligible) --

15 MR. PERLMAN: Excuse me, Judge; I had a quick  
16 comment. My notes are terrible, but --

17 THE COURT: Um-hum.

18 REDIRECT EXAMINATION

19 BY MR. PERLMAN:

20 Q Ms. Luna, did you do anything right after --  
21 following contacting the authorities, in terms of  
22 remaining in town or not as a result of these threats?

23 A Yeah, I actually left town and I stayed -- I'm  
24 not going to disclose where I went unless they force me  
25 to, but I left town because I felt that this man -- and

1 obviously, he's talking about where I lived and  
2 everything. I felt that he was going to try to hurt me  
3 and also to -- apparently people close to me, which would  
4 be my husband.

5 And so I left, and it's been really difficult.  
6 Especially to see that this individual, regardless of  
7 their restraining order being in -- in effect has, I  
8 believe, on multiple occasions tried to use the media and  
9 other avenues of harassing and intimidating me during this  
10 time period.

11 MR. PERLMAN: Thank you.

12 THE COURT: Is that all the questions?

13 MR. PERLMAN: Yes, Your Honor.

14 THE COURT: Okay. Mr. Hayslett?

15 MR. HAYSLETT: Yes, thank you.

16 CROSS-EXAMINATION

17 BY MR. HAYSLETT:

18 Q Ms. Luna, how are you? Good to see you. Ms.  
19 Luna, can you hear me?

20 A Oh, yes, I can hear you.

21 Q Okay. Great. So let's start a little bit with  
22 a background -- or jump around a little bit. When you  
23 first went over, did you go over to Ms. Olzewski's house  
24 the night of June 8th?

25 A I stated -- I stated to you in my deposition and

1 as well to Mr. Perlman that I was at my own home and I was  
2 never with Ms. Olzewski.

3 Q So help us understand where -- how was it that  
4 Ms. Olzewski played the voice text for you?

5 A What text are you talking about?

6 Q The night of June 8th?

7 A She -- and I don't recall her doing that. I  
8 spoke to her at 12:30. I was also asleep. So I don't  
9 fully remember what avenue that happened in, but it was  
10 definitely not within her presence because I was with my  
11 home -- my husband at home that night.

12 Q I understand, but explain to us how you heard  
13 that voice text.

14 A I don't recall. I believe maybe she sent it to  
15 me, but I don't want to speculate. I really -- I'm not  
16 trying to hide the ball here; I don't recall.

17 Q No. I understand. And obviously, that voice  
18 text was chilling to you. Why don't you tell us what he  
19 said.

20 A Well, I don't recall. I actually am -- like, my  
21 memory of that day, because of everything that happened,  
22 was really just after the phone call.

23 Q So you don't recall listening to a voice text?

24 A I don't recall what the context of the texts  
25 were. I think earlier that evening, Erin had reached out

1 to me and told me that Braddock would like to speak with  
2 her and I told her that he was dangerous and that he  
3 freaked me out and that I would avoid it all together.

4 Q Okay. So I guess --

5 A So I don't recall.

6 Q You don't recall hearing it. Okay.

7 Let's back up for a second. The first time that you  
8 have contact with him I guess was --

9 A With them?

10 Q Excuse me, with Mr. Braddock.

11 A Okay.

12 Q The first time you had contact with Mr. Braddock  
13 was on a radio show?

14 A Yes.

15 Q And the radio show, was that the WTAN?

16 A Tan Talk, I believe.

17 Q Okay. And -- and this time, he called up, was  
18 he harassing you?

19 A He had phoned in to a radio station. I didn't  
20 have control over what calls were taken or how to end that  
21 phone call. And I can tell you that from what I recall on  
22 that segment -- and it was, again, a while ago now, so  
23 I'll just kind of summarize, but he was very aggressive on  
24 the actual radio station.

25 Leading up to that, at this point in time, I had been

1 already made aware, somewhat, of him because of Audra  
2 Christian. And earlier that morning, Ron Ogden had said  
3 that I guess he had inquired to see if I would be on that  
4 show.

5 Q Could you help --

6 A So on that radio station, he did not verbatim  
7 make a physical threat to me there, but he was attempting  
8 to assault my reputation by basically lying. And in  
9 addition to that, I was already on egg shells and  
10 emotionally stressed and pretty much very wary of him  
11 because of what I had received from Audra.

12 Q So and I could understand that. He was  
13 assaulting your reputation. It must be very difficult to  
14 be a candidate because folks are probably firing questions  
15 at you all the time and asking about your experience. It  
16 must be very difficult to take those questions.

17 So as he was assaulting your character that day,  
18 because I -- it must have been very emotional for you.  
19 What -- why don't you describe to us how he assaulted your  
20 character?

21 A Well, Kevin, it's only hard as a candidate when  
22 people lie about you and when people attempt to put words  
23 in your mouth that you never said. But he assaulted my  
24 character by inferring that I had actually done something  
25 that in the military you don't do. It's called stolen

1 valor. And if you've ever served, you would realize that  
2 for a military member, their uniform is sacred. And what  
3 he was implying was he was actually taking the cover of a  
4 magazine on a national publication and implying that I was  
5 claiming to be something that I wasn't, which was a lie.

6 Q Are you referring to the photograph of you  
7 wearing camouflage with a dog?

8 A Yes, that's actually from a photo shoot for  
9 Ballistic Magazine and I was on the front cover.

10 Q And was he alleging that using the DOD  
11 requirements that you can't be in a uniform or something  
12 that purports to be a uniform unless it's a --

13 A No. He was alleging -- he was alleging that I  
14 was claiming to be a combat veteran when I never did. And  
15 actually, just so that you're aware, that uniform is not  
16 actually a military-issued uniform, which is something  
17 that any military service member, at least someone with  
18 good character, would understand.

19 Q You know, I -- I actually asked some people  
20 about that with good character. You know, and they  
21 intimated to me that what you don't do -- and maybe you  
22 can shed some light -- is to give the inference that what  
23 you're wearing is a uniform when it's not. Was that what  
24 you were trying to do in this photograph?

25 A I don't think they would --

1 MR. PERLMAN: Objection.

2 Hol -- hol -- hol -- hold on.

3 I would just object. It's compound. I think it  
4 included his testimony based on evidence that's not  
5 part of this record. I would like him to rephrase.

6 THE COURT: Okay. Can you please rephrase?

7 Q (By Mr. Hayslett) Ms. Luna, was his assault on  
8 your character accusing you of posing for a photograph  
9 wearing what purports to be a uniform, which is in  
10 violation of the DOD restrictions?

11 A You actually have to play that recording to see  
12 what he said to get his inference because I don't want to  
13 speculate as to what he was trying to say. But I can tell  
14 you that the DOD says if you are in uniform you can't wear  
15 it. And that is not a uniform, which is why Ballistic  
16 Magazine was able to publish that and exactly why I have  
17 not been under scrutiny for stolen valor.

18 Q And the idea is you weren't trying to make this  
19 look like a uniform, correct?

20 A No, sir. You can buy that anywhere.

21 Q I understand. And the American flag patch in  
22 the middle, that wasn't to make it look like a uniform,  
23 correct?

24 A No. But if you would like to go to the  
25 significance of that, when you are under threat, you wear



1 something of color to signify that you're a good guy, not  
2 a bad guy.

3 Q I understand. So when you had this photograph  
4 taken and posed for a magazine, you were not trying to  
5 give anybody the impression that you were in a American  
6 Army uniform or an Air Force uniform at the time you did  
7 the photograph, right?

8 A Sir, that's not an Air Force uniform, so no.

9 Q Okay. So he assaulted your character by saying  
10 that what you did in the photoshoot was not appropriate,  
11 and that was the assault?

12 A No. He was implying that I was guilty and had  
13 violated a DOD law that was clearly not true. So he was  
14 actually lying.

15 Q Okay. And -- and did that cause you the  
16 emotional distress that you spoke about?

17 A What caused me the emotional distress is that  
18 leading up into that, he was talking about me in a very  
19 disturbing fashion and that he was seeking me out to have  
20 a direct interaction with me, confirming prior that he  
21 knew I would be on that radio station; that's what  
22 concerned me.

23 Q And that caused you the emotional distress you  
24 speak of?

25 A Yes.

1 Q People accusing you of doing something wrong?

2 A No. It would be your client was making very  
3 vulgar statements and aggressive statements about me  
4 leading up to that event.

5 Q Let's just --

6 A He was directly seeking interaction with me,  
7 which caused me to become stressed out because of the fact  
8 that I believe that your client is a predator.

9 Q Okay. Let's talk about the "vulgar statements"  
10 that he had said to you. What were the "vulgar  
11 statement"?

12 A I said that he made those statements in texts to  
13 other people. I didn't specify that he did that in the  
14 interview.

15 Q What "vulgar statements" had you received prior  
16 to this radio show?

17 A I received many, some of which have been  
18 submitted to the Court as evidence. I don't want to  
19 assume, but I can tell you that for the most part, it was  
20 very evident that William Braddock had an issue with  
21 women, me being one of them, and that he did not like me  
22 and that at this point in time, he was talking about doing  
23 things. And this is, in my view, just the beginning.

24 Q So let's put this in context. So the "vulgar  
25 statements" that you're referencing, who were those from,

1 prior to the radio show?

2 A Audra Christian.

3 Q Okay. And which "vulgar statements"?

4 A I would have to see more of them, but some of  
5 the statements that he sent in general, he's called me a  
6 dumb bitch, he's called me a cunt, he says he knows where  
7 I live, he says that he's going to make me disappear, he  
8 calls me a grease spot. I mean, I could go on, but  
9 leading up into this -- I just don't want to give you a  
10 speculation. I received many text messages, sir.

11 Q So you're on that show. You had received all  
12 those text messages prior to the --

13 A Some of them, yes.

14 Q Some of them prior to the show, so you knew what  
15 the situation was. He -- yeah, I think the word was  
16 assaulted your reputation, correct?

17 A Yes.

18 Q Caused you this emotional distress that you  
19 speak of; is that right?

20 A Correct.

21 Q Okay.

22 A But he did that leading up. He's been doing  
23 this. So how I took this entire thing was, one, I wasn't  
24 actually aware that they would answer a call from him. As  
25 you can see, it's a radio show, so I have no control over

1 who gets on, who gets off; that's not my show. So when he  
2 phoned in, at that point in time, that's when Ron Ogden  
3 had told me later on that it was William Braddock. He  
4 also specified to me that evening, et cetera.

5 Q Did he threaten you on the show?

6 A No. He did not. Not my physical sense.

7 Q But you felt like prior to that you were  
8 threatened?

9 A I felt, leading up to it, because of the fact  
10 that he was at this point in time, I was thinking, maybe a  
11 little bit fixated, I did feel that it was a very odd  
12 circumstance for then -- for him to then also, you know,  
13 be obsessively texting about me and then phone into  
14 something that I was one. So I felt -- yes, definitely  
15 like it was a weird situation at this point in time. And  
16 then I only realized it would get worse.

17 Q Prior to that radio show, had he ever contacted  
18 you through text?

19 A Not that I'm aware of, no.

20 Q Are you aware of the texts that you get?

21 A Yes, I am. But I also sometimes receive, you  
22 know, emails from random people or fake email accounts.

23 Q Sure.

24 A So who knows what he was up to on his free time.

25 Q Are there any texts that you received from

1 random people that you believe were Mr. Braddock?

2 A Not currently, no.

3 Q At any point?

4 A I just answered your question.

5 Q You said "currently" and I said "at any point".

6 At any point did --

7 A I said no. Not currently, no.

8 Q Okay. How about has he attempted to email you?

9 A Not to my knowledge.

10 Q Has he called you on the phone, if ever?

11 A he did seek to find my contact information and  
12 he put that in text message to Audra Christian.

13 Q Did he call you on the phone?

14 A No. But because he would -- would not receive  
15 my contact information.

16 Q Okay.

17 A I do believe that he attempted to get my contact  
18 information so that he could call me.

19 Q Understand. So as I think we were at this radio  
20 show and at any point, he's never emailed you, called you,  
21 or texts you. He assaulted your character on this night.

22 A He also asked to make sure with Ron Ogden,  
23 (unintelligible) there that I was on that show.

24 Q To make sure you were on the show so he could  
25 ask you those questions. Did you know at that point he

1 was considering running for congress?

2 A I don't believe so, at that point. And you  
3 would have to maybe ask Ron Ogden the specifics of what  
4 their conversation was.

5 Q But did you know at that point?

6 A No. Not to my knowledge. I believe that this  
7 was leading up, into it.

8 Q So on the first --

9 A I don't believe he had announced at that point.

10 Q On the first incident in the radio show, as I --  
11 so I'm clear in this, you interpreted that as aggressive,  
12 an assault, and you were emotionally distressed because of  
13 his -- because of his accusations and his questions to  
14 you, correct?

15 A No. I was, during that time, hesitant because  
16 of the fact that he was already, in text message, talking  
17 to Audra Christian about me in a very defamatory way and  
18 he was intentionally seeking to have interaction with me  
19 that, frankly, I thought was weird because of the fact  
20 that your client seems to be fixated on me.

21 Q Don't you think the clie -- that candidates  
22 for -- for offices like congress have to have thick skins?

23 A Absolutely. And in fact, on a regular basis,  
24 part of my job has been to communicate and to debate those  
25 ideas on the public arena. But there is a big difference

1 between having thick skin and someone talking about  
2 murdering you, of which your client did.

3 Q Well, I understand that and we'll get to that in  
4 a second. I'm talking about just asking you a question  
5 about stolen valor, whether or not that photograph was  
6 appropriate.

7 A I'm not saying -- I'm not saying that that in  
8 particular was what was getting me emotionally upset. It  
9 was leading up to what he was doing in order to execute  
10 that. Your client had planned to seek an interaction with  
11 me in order to upset me. That is emotional harassment and  
12 that is exactly evident from these courses of events  
13 leading up to that event.

14 Q Isn't that what happens when you run for office  
15 and you call the other opponent a name? Isn't that your  
16 attempt to harass that person, to belittle that person?  
17 Isn't that the way this --

18 A I wouldn't have ever --

19 Q -- politics works?

20 MR. PERLMAN: No need -- excuse me, excuse me; I  
21 apologize for interrupting.

22 Judge, I -- I don't know if it's asked and  
23 answered or badgering the witness, but she clarified  
24 the basis of her emotional distress. And I don't  
25 know why Counsel keeps on rehashing it, but I don't

1 think it's fair to reask the same questions or argue  
2 with the witness.

3 MR. HAYSLETT: I'm not arguing, Judge. I'm  
4 asking if she is a political candidate, whether or  
5 not she has to have a thick skin, whether or not --

6 THE COURT: I think --

7 MR. PERLMAN: Asked and answered.

8 THE COURT: I think that is asked and answered.

9 MR. HAYSLETT: Okay.

10 Q (By Mr. Perlman) So Ms. -- so Ms. Luna, we have  
11 the radio show incident right here. You're upset about  
12 what happens. That evening is when you see Mr. Braddock  
13 for the first time in your life in person?

14 A That evening is when your client blocked my  
15 pathway when I was at an event where he sought personal  
16 interaction with me for the first time, yes.

17 Q So is this the first time you've ever seen him  
18 in person?

19 A To my knowledge, yes.

20 Q And at this point, this is an event that you are  
21 attending, not speaking at?

22 A I did speak at that event.

23 Q So you were a speaker, okay. You were speaking  
24 at the event and he attempts to contact you?

25 A He did not attempt. He blocked my pathway,



1 introduced himself, and sought direct engagement with me.  
2 Of which at that point in time, I broke interaction  
3 because I feel that your client is unstable, fixated on  
4 me, and wants to hurt me because of the text messages  
5 that -- that I had received. So yes, I broke interaction.  
6 And it is my belief and -- that it was your in -- the  
7 intention of your client to seek a very bad interaction  
8 with me.

9 Q Okay. So you believe that he had the intent to  
10 do you harm in that interaction?

11 A Yes. If I was walking in front of you and you  
12 blocked my path, how would you perceive that?

13 Q Well, I'm going to ask you questions, but you  
14 perceived it as he was going to do you harm?

15 A Yes.

16 Q And you, because of your skilled -- your Air  
17 Force skills were able to disengage and avoid that harm?

18 A Because of my common sense, I was able to read  
19 that as a bad situation and avoid it. So yes, I broke  
20 contact.

21 Q Did he threaten you?

22 A With his body by blocking my pathway, yes. He  
23 sent body language that I would deem, and I think that  
24 most people would deem, as aggressive.

25 Q So him attempting to have contact with you and

1 blocking your path, you deem that as a physical  
2 altercation?

3       A     I thought that he was going to try to, yes.  And  
4 I say that because leading up into this I had received  
5 text messages from Audra Christian and other people,  
6 stating that he was someone that I should stay away from.

7       Q     Okay.  So did you -- were you emotionally  
8 distressed after that?

9       A     Well, I can tell you that it wasn't a good  
10 thing, so yes, I was very upset about it.

11       Q     So now, you had two episodes in a short amount  
12 of time, he's assaulted your character, he's stepped in  
13 front of your path.  You perceive that -- in your mind  
14 that you avoided a physical altercation, dodged a bullet,  
15 if you will, and you were emotionally distressed because  
16 you had seen him twi -- well, talked to him on the same  
17 day, but seen him for the first time and felt that that  
18 was an aggressive stance that he took with you; is that  
19 right?

20       A     Yes.

21       Q     Let's talk about the next time that you saw Mr.  
22 Braddock.  When was that?

23       A     I never saw him in person after that event.

24       Q     Was there any direct contact that you had with  
25 Mr. Braddock in your life that you have knowledge of,

1 other than the radio show, where he assaulted your  
2 character, and the speakers -- whatever this was where you  
3 were speaking and he blocked your path?

4 A Yes, the evening I filed the injunction  
5 paperwork, I guess the day, maybe, after he was served --  
6 because for a while he was dodging law enforcement, so  
7 they weren't able to serve him. At that -- and I don't  
8 think that you were actually on his case at that time, but  
9 that evening, he posted this information online and I  
10 received a message from Amanda, which she's testified that  
11 he was attempting to post the restraining order and that  
12 message to me, directly addressing me online in regards to  
13 my filing.

14 Q So my question --

15 A I took that as he was attempting to communicate  
16 with me at that point in time.

17 Q Well, I guess what I meant to say, did you ever  
18 see him in person after that?

19 A No. I never saw him in person after that.

20 Q So the only time you saw him in person is the  
21 one time and then one time on the radio; that's the only  
22 communication you've ever had with him?

23 A When he phoned into the radio station, when he  
24 blocked my pathway and attempted to talk to me. Also,  
25 that same night, I think it's important to note that

1 William Braddock in the phone call stated -- that I did  
2 hear myself -- that --

3 MR. HAYSLETT: Judge, I'm going to object to her  
4 quoting the phone call.

5 THE COURT: Sustained.

6 Q (By Mr. Hayslett) So Ms. Luna, let's talk about  
7 the other contact that you had. We talked about these two  
8 contacts right here, and I can understand why someone like  
9 you would be emotionally disturbed by this, but let's talk  
10 about the Facebook postings.

11 The first Facebook posting, I think, is Exhibit --

12 MR. HAYSLETT: Is this 8 or 7, Judge?

13 THE COURT: 7.

14 Q (By Mr. Hayslett) 7. This is the one that has  
15 the restraining order in it that was posted. And it shows  
16 William Braddock: "When someone is so desperate to win a  
17 seat in congress, they file a false police report". Now,  
18 this was -- as I understand it, he -- he -- your  
19 interpretation, he tagged you in this and this was sent to  
20 your Facebook account; is that right?

21 A No. That's not what I stated. And I can't see  
22 that, so if you can maybe hold it up to this camera so I  
23 can see it, please. I can't see that, sir.

24 THE COURT: I think there's a camera somewhere  
25 around there.

1           A     Yeah, the camera's over here. Yeah, here,  
2 closer. If you can just hold it up, in front of the  
3 camera?

4           THE COURT: And I'm not sure --

5           A     Yeah, to the left.

6           Q     (By Mr. Hayslett) Oh, here it is.

7           A     Or --

8           Q     Okay. I see it.

9           THE COURT: I don't even know where it is.

10          MR. HAYSLETT: I see it.

11          A     Okay. I can see it. What's your question?

12          Q     (By Mr. Hayslett) My question is, did he send  
13 this directly to you?

14          A     That was a posting that he attempted to submit  
15 to the Community Patriots page. And I wanted to make sure  
16 that I correctly explained this to you because I felt like  
17 you had asked this question.

18                So according to Facebook's terms and conditions and  
19 also to -- according to what they state for how you  
20 communicate on these different groups, when you submit a  
21 posting, it does notify the individual who is a part of  
22 that group. I am a member of the Community Patriots group  
23 and I do believe that it was his intention for me to see  
24 that posting.

25          Q     Let -- let -- let me break this down for a

1 second. Your testimony is if you're a member of a group  
2 and someone attempts to post something that preapproval,  
3 you get notified?

4 A No. That's not what I stated.

5 Q Okay. So help me understand this. He -- he  
6 submits this posting to the group. It goes to an  
7 administrator. They either approve or decline.

8 A Correct.

9 Q My question is, did you see this on your  
10 Facebook page, you yourself?

11 A I did not see that on my Facebook page.  
12 However, I was sent that because William Braddock, your  
13 client, was attempting to post it to the group and had  
14 Amanda approved that posting, which she specified in her  
15 testimony that she does not recall whether or not it has  
16 been posted. It may have been deleted.

17 But regardless, if you are part of a group like  
18 Community Patriots, which is an approval basis community  
19 group, you will receive notifications as a member of that  
20 group according to your settings. As far as I know, I  
21 have my notifications on, thus I would have received a  
22 notification with the intention of your client to submit  
23 that.

24 Q But only if it got posted?

25 A Correct.

1 Q Only if it got approved?

2 A Correct.

3 Q So -- so --

4 A However, Amanda stated that it could have  
5 possibly been posted. I saw it regardless.

6 Q Well -- well -- well, I understand you saw it  
7 because someone sent it to you, but you didn't -- you  
8 never saw this on the Community Patriots page.

9 A So I was not on Facebook that evening and so no.  
10 I did not see it on my personal Facebook page.

11 Q Okay. You never saw it in the group. I mean,  
12 you never -- you're not here to testify that you saw this  
13 in that Facebook group, are you?

14 A I can't really hear you, sorry, it's muffled.

15 Q You're not claiming that you actually saw this  
16 on Facebook at any point, are you?

17 A No. Amanda sent it to me.

18 Q Okay. So as far as this directed to you, it  
19 never got to you through Facebook, did it?

20 A No. Kuddos to Amanda. However, your client did  
21 intend for it to go to me, which is why he writes to me in  
22 that paragraph.

23 Q I understand that, but let's talk about Facebook  
24 for a second. This never came across Facebook. You never  
25 read it on Facebook. It never got sent to you on

1 Facebook. I understand he may have tried to, but it never  
2 got sent to you?

3 A Actually, sir, I haven't checked my Facebook  
4 messages, but I do know after he posted that that many  
5 people had sent me that. And so it's very possible that  
6 it could be in my Inbox on Facebook, so I don't want to  
7 for sure say no because, again, I have not checked my  
8 Facebook messages as I -- and I'm sure you can imagine I  
9 get many.

10 Q I can't imagine. I can't imagine what it's like  
11 to be you.

12 But on this que -- on the second posting right here,  
13 this is the one that says "Community Patriots official  
14 Luna tried to take out all her potential primary  
15 opponents". I assume you never really tried to kill  
16 anybody, did you?

17 A Sir, I hope that you're not joking because I  
18 consider this a very serious matter and I feel like you're  
19 being kind of rude.

20 Q Well, I understand your feelings. My question  
21 is when he posted this, when he used the word Luna tried  
22 to take people out, you never tried to take anybody --

23 A I think that's a question for your client, not  
24 me.

25 Q No. My question's for you. You never tried to



1 take --

2 A Are you asking me if I killed someone?

3 Q Yes. You didn't -- when this was posted, you  
4 didn't interpret that you tried to take anybody out; is  
5 that correct?

6 MR. PERLMAN: Judge, I'm going to object. This  
7 is a statement by Mr. Braddock. This is a posting  
8 that he attempted that the community declined. So  
9 this -- this wasn't even posted on that Community  
10 Patriots Pinellas exchange. But regardless, it's a  
11 statement by Mr. Braddock. Is -- is he asking the  
12 witness to interpret what Mr. Braddock is asserting?  
13 It just seems argumentative and speculative and  
14 irrelevant.

15 Q (By Mr. Hayslett) Well, I think your counsel  
16 answered the question. Ms. Luna, you never saw this post,  
17 then, correct?

18 A I did see that posting because it was sent to  
19 me.

20 Q So you sent it because someone screenshotted it  
21 and sent it to you?

22 A Correct. And people were also sharing that  
23 posting as well, on multiple different platforms.

24 Q So other people, besides Mr. Braddock, put it on  
25 Facebook for you to see?

1           A     In addition to Mr. Braddock.

2           Q     So I guess I'm confused here.  So my  
3 understanding was, through your counsel, this got  
4 submitted to the Community Patriots official site, or  
5 page, rather.  It got declined, so it never got posted,  
6 but it got posted by other people, not Mr. Braddock.

7           A     And -- and also Mr. Braddock.  So if you look at  
8 what you're holding in your hand, it will see -- say his  
9 name.  It says William Braddock.  That means that he  
10 posted it to his page and then shared it.

11          Q     So are you --

12          A     So wheth -- whether or not they -- go ahead.

13          Q     Are you friends with him?

14          A     I actually blocked him, so it's very possible  
15 that he followed me, but I have not accepted his friend  
16 request.

17          Q     Did he --

18          A     I blocked him literally the day that I got the  
19 injunction.

20          Q     So --

21          A     And I blocked him, to answer your question,  
22 because he had mentioned that I was showing up at a Log  
23 Cabin event.  And I had, up until recently and up until  
24 this injunction hearing started and this whole process  
25 took place, I would post events that I would be attending.

1 And in correspondence with Audra, to my interpretation, it  
2 seemed like he was keeping tabs on where I was at.

3 Q So let me go back to this post here. Did you  
4 ever see this on Facebook?

5 A No. That was sent to me by Amanda.

6 Q So his posting, you would have only seen it  
7 organically. And what I mean by that is on Facebook, if  
8 you are friends with him, which you are not?

9 A If you are friends with him or if Community  
10 Patriots approved the posting or if other people shared  
11 it, which is all possible.

12 Q So these two -- these two Facebook foes --  
13 posts, I guess 7 and 8, never came to you through  
14 Facebook. They only came to you from other people who  
15 screenshotted them and sent them to you?

16 A Correct. At that point in time, as I've stated  
17 earlier, I was actually off social media because of the  
18 emotional distress I was under and also because of the  
19 fact that many people, to include associates of your  
20 client, were actually lying about me and saying that I was  
21 making all of this up, which clearly, according to the  
22 evidence, I was not.

23 Q So I understand that you were never put on  
24 notice on these two posts. So the allegations of your  
25 stalking I guess are limited to the times that he

1 assaulted your character on the radio show and the time  
2 that he blocked your path; is that correct?

3 MR. PERLMAN: I'm going to object. I'm going to  
4 object to the extent he's improperly restating her  
5 testimony. The emotional distress associated with  
6 the radio show was the intentional targeting and  
7 seeking her out, not necessarily the content. And  
8 her testimony has been -- been pretty clear to that.

9 Q (By Mr. Hayslett) Ms. Luna, other than these  
10 two ob -- these two -- these two times on the radio and in  
11 person, is there any other time where you actually  
12 interacted with Mr. Braddock or received a message from  
13 him directly?

14 A I never received a message from him directly,  
15 but what is, I guess, really alarming to me, especially as  
16 a person that received this injunction, is one, I never  
17 went to the press with this. And also, two, this was  
18 supposed to cover digital communications as well.

19 And so when you have someone that posts something  
20 like this and then they have their friends contacting you  
21 or harassing you, especially during a time when this was  
22 especially an open investigation and still is, it's a  
23 criminal investigation with the Department of Justice and  
24 the FBI, at that point in time, I would absolutely  
25 consider this interaction or at least attempted

1 interaction.

2 And so I'm not trying to argue with you and I'm not  
3 trying to be disrespectful, but how I perceived this and  
4 in addition to everything else that your client has done  
5 to me and to my family, yes, I perceived this as a direct  
6 attempt for interaction to me.

7 Q Which is the Facebook post?

8 A All of it.

9 Q All of it. Understand.

10 The -- the other third party, the direct  
11 communication, was it Arthur Mac -- Maxwell, is it  
12 Mackwell who contacted you?

13 A Can you specify as to what you're asking, sir?  
14 I don't -- I'm not sure I fully understand.

15 Q Is his name Arthur Mackwell, is that his name?

16 A Arthur Mackwell is one of the witnesses.

17 Q Did he contact you?

18 A He told me that Braddock was creeping him out  
19 and then I stated what he stated.

20 Q And James Sung, when did you talk to James Sung?

21 A James Sung emailed my campaign shortly after  
22 Braddock had posted the restraining order on his Facebook  
23 page and the Tampa Bay Times published the article --

24 Q Did you ever --

25 A -- regarding this case.

1 Q Did you ever speak to Mr. Sung?

2 A I did.

3 Q And what did Mr. Sung tell you?

4 A Are you -- Mr. Sung told me that William  
5 Braddock had worked with him in China and Shanghai, I  
6 think it was. And that he had made some really alarming  
7 comments to him, that he had threatened him, and Mr. Sung  
8 had actually emailed that stuff to my campaign and at that  
9 point in time, he I assume was trying to be helpful,  
10 maybe.

11 Q Was that from the two -- this happened in 2019?

12 A Those questions are for Mr. Sung. I -- I don't  
13 feel comfortable speculating on his testimony. He was  
14 going to testify today, but time got away.

15 Q Mr. DeMint, is he -- did he send you a  
16 screenshot?

17 A Yes.

18 Q Is that the screenshot where he said, or alleged  
19 Mr. Braddock said, "Myself and other candidates and my  
20 team will take out Luna, no questions asked"? What was  
21 your understanding by that statement?

22 A Well, prior to that, he calls me a grease spot  
23 and so I took that that he was violent and that he wanted  
24 to physically eliminate me, mainly meaning that he was  
25 going to kill me, of which later on that was confirmed.

1 Q And he's working with those other candidates to  
2 do it?

3 A That's a question for, I think, your client.

4 Q Okay. So other than these two times, the radio  
5 show and in person, the two Facebook posts that never got  
6 to you, was there any other contact that he ever made or  
7 attempted to make during this entire time?

8 A The Facebook postings did -- so there was the  
9 two radio -- the radio, the in-person incident, the two  
10 Facebook postings, and then he also sought interaction  
11 with my husband, which I took as also somewhat geared at  
12 me because he did threaten to hurt people close to me.

13 Q The interaction with your husband is the --  
14 you -- you're speaking to that night when he said I'm  
15 running against your wife for congress? That interaction?

16 A Yeah, he actually physically sought him out.  
17 And I know my husband's not on testimony today as a  
18 witness, but I can tell you that my husband was disturbed  
19 by that interaction because of the text messages and the  
20 comments that your client had made about me, leading up to  
21 that event and because of the fact that your client sought  
22 me out and was trying to harass me at that point in time.  
23 Which is very different from, I think, normal campaigning  
24 and it has nothing to do with thick skin and everything to  
25 do with common sense.

1 Q Did you ever tell Mr. Braddock not to contact  
2 you?

3 A I had no way of contacting Mr. Braddock, so no.

4 Q The night that you saw him, when he blocked your  
5 way, did you tell him not to contact you and get away?

6 A I actually disengaged in the conversation and I  
7 walked away. I didn't want to talk to your client more  
8 than I had to.

9 Q I understand.

10 MR. HAYSLETT: Judge, I don't have anything  
11 else.

12 THE COURT: Okay. I guess I need to find out  
13 some more details.

14 All right. I have the two incidents on the --  
15 May -- what was it -- 26th, and then prior to May  
16 26th, with the radio show and the evening event, had  
17 you had any text messages or anything related to Mr.  
18 Braddock, any kind of awareness of him?

19 THE WITNESS: Yes, I did. From Audra Christian.

20 THE COURT: Okay. And when -- when was that?

21 THE WITNESS: I believe I started receiving  
22 messages about him maybe a little bit after my  
23 birthday, so early May. Maybe second week in May.

24 THE COURT: And what type of messages did you  
25 receive?



1           THE WITNESS: They were very charged. So an  
2           example of one of them was he was talking about -- I  
3           believe he called me -- I'm not trying to be rude  
4           here to you, but he called me a cunt, I believe, in  
5           one of them. There was some where he was very  
6           aggressive in his nature and clearly, to the point  
7           where Audra and Amanda, leading up into this point,  
8           had told me that he was a little bit bizarre and that  
9           I should probably just stay away from him.

10           At that point in time, I -- like, I didn't fully  
11           know how to handle the situation because it really  
12           kind of took a turn for the worse very quickly, after  
13           the 25th.

14           THE COURT: So are you saying that the type of  
15           messages that you received from Audra were, like,  
16           screenshots or they were forwards of texts? I'm --  
17           I'm trying to understand what types of message, not  
18           what the content of them was, but the types of  
19           messages.

20           THE WITNESS: Okay. The types of them were --  
21           some of them were screenshots of text messages, some  
22           of them were screenshots of, I believe, Facebook  
23           interaction.

24           THE COURT: Okay. And were there any phys --  
25           threats of physical harm towards you?

1 THE WITNESS: At that point in time, no.

2 THE COURT: Okay.

3 THE WITNESS: He didn't start getting, I guess,  
4 aggressive and making that type of threat until, I  
5 believe, it was after the 25th.

6 THE COURT: Okay. And --

7 THE WITNESS: He was just very aggressive in  
8 nature.

9 THE COURT: Okay. And so just kind of name  
10 calling and that kind of unusual behavior for  
11 somebody you didn't know?

12 THE WITNESS: Yes. And if I can, Your Honor, I  
13 know some people are probably not going to like me  
14 because I'm running for office. And part of the  
15 reason why I did not initially know how to handle the  
16 situation is because, you know, there are people that  
17 say, oh, well, are you just doing this for politics.  
18 But clearly, it got very aggressive and he's calling  
19 me a grease spot and talking about, you know,  
20 murdering me and how he's going to do it. And so at  
21 that point in time, I brought it forward to the  
22 appropriate authorities because I just -- I didn't  
23 know what else to do.

24 THE COURT: Okay. But that message wasn't even  
25 sent until June, the grease spot.

1 THE WITNESS: (Unintelligible).

2 THE COURT: Okay. So I'm just trying to find  
3 out what you knew before you actually physically saw  
4 him or had any interaction with him. So Audra sent  
5 you some text messages where he was saying unfriendly  
6 things and then who else sent you messages prior to  
7 the -- the 26th?

8 THE WITNESS: I believe it was Amanda as well.

9 THE COURT: Okay.

10 THE WITNESS: She testified. And from Audra's  
11 interpretation of his interactions regarding me,  
12 leading up to that, Audra did tell me that I should  
13 probably stay away from him.

14 THE COURT: Okay. Okay. And -- and Amanda,  
15 what did Amanda tell you prior to you --

16 THE WITNESS: It goes along the same lines.  
17 Actually, the conversation that I had with them was  
18 that he was weird about women and that he had asked  
19 to have sex with one of their friends and it weirded  
20 them out. And so basically, it was to -- that I  
21 should stay away from him. That was actually the  
22 exact conversation.

23 THE COURT: Okay. All right. And so then,  
24 after that, you have an interaction with him on the  
25 26th?

1           THE WITNESS: I believe the only interactions I  
2 had with him in pers -- well, on the radio show and  
3 then the same day. I think it was the 25th, in the  
4 evening --

5           THE COURT: Okay.

6           THE WITNESS: -- with the Community Patriots  
7 event.

8           THE COURT: Okay. And so other than those two  
9 people prior to the 25th, did you receive any other  
10 messages or anything? Was there anything that Amanda  
11 told you about or any kind of threat specifically  
12 directed at you prior to the 25th that you learned  
13 of?

14          THE WITNESS: No. It wasn't until after the  
15 25th that I started really receiving some more  
16 disturbing stuff.

17          THE COURT: Okay. So then, the 25th happens and  
18 then what happ -- what is the next time you receive  
19 messages, really -- either from third parties or  
20 related to him, prior to Ms. Olzewski contacting you  
21 on the -- on the 8th or 9th?

22          THE WITNESS: I received from that time, so  
23 around the 9th, probably maybe about thirty text  
24 messages or ish, I'm going to estimate, where he was  
25 talking about me in different capacities and talking

1 about where I was going. The Log Cabin Republicans  
2 event would be one of them. Then the call happened  
3 on the 9th. And then, we actually also received more  
4 information about things that he had said to people  
5 after that, i.e. James Sung.

6 THE COURT: Okay. And so aside from talking  
7 about you and talking about your schedule, which you  
8 were posting on social media, did -- was there any  
9 threats of physical violence that you received, any  
10 messages about threats of physical violence?

11 THE WITNESS: He was stating -- and to Audra, I  
12 believe -- and I try not to get the text messages  
13 confused because I received a lot of them -- but he  
14 would use verbiage that he was going to take me out.  
15 He specified -- and I think I'm answering your  
16 question correctly -- that he basically had wanted to  
17 remove me. That, how I was perceiving it, especially  
18 after the 25th with how he acted towards me, I was  
19 perceiving all of those text messages that this man  
20 was going to try to hurt me. And I hope I'm  
21 explaining that correctly because I received a lot.  
22 And it's not that I'm trying to not answer your  
23 question, I just want to make sure that I'm  
24 accurately, I guess, answering the question.

25 THE COURT: So at what point do you perceive

1           that he is attempting or is potentially going to harm  
2           you?

3           THE WITNESS: I thought the minute he called  
4           into the radio station was weird, but when he tried  
5           to seek me out and, like, physically confront me and  
6           block my pathway is when I just was on pins and  
7           needles and I realized that this guy was not a  
8           normal, just, person who has disagreeing opinions.  
9           At that point in time, because of his body language  
10          and because of the fact that I felt like he was  
11          fixated on me and that he was obsessively talking  
12          about me with people that he didn't necessarily maybe  
13          even know knew me, I felt like he was working himself  
14          up to do something very bad.

15          THE COURT: Okay. And did you report any of  
16          this to law enforcement?

17          THE WITNESS: I have a couple of friends that  
18          are in the law enforcement community and I have also  
19          a couple of friends that are attorneys. And so I did  
20          talk to them just off record. And the problem that I  
21          did not want to run into is the fact that -- I think  
22          especially with something like this, I didn't want to  
23          bring it forward and -- and people to tell me that I  
24          was just making it up and to laugh it off.

25          I didn't also really know how to handle the

1 situation, and so I was making sure that I was, like,  
2 doing everything that I could, essentially. That  
3 kind of all went out the window after Erin called me  
4 the night of -- I believe it was the 9th.

5 THE COURT: Okay. I think that's all the  
6 questions I have.

7 Mr. Hayslett, do you have any additional  
8 questions?

9 MR. HAYSLETT: No, Judge, not based upon your  
10 questions. You asked them for me.

11 THE COURT: All right. In all fairness, for the  
12 record, you guys asked questions first, so.

13 All right. And Mr. Perlman, do you have any  
14 additional questions?

15 MR. PERLMAN: Yes, rather briefly if I may,  
16 Judge.

17 THE COURT: Okay.

18 REDIRECT EXAMINATION

19 BY MR. PERLMAN:

20 Q You -- you were just commenting how initially  
21 you contacted friends that may work with certain  
22 authorities, correct?

23 A Correct.

24 Q And did they suggest that you start getting  
25 proper documentation so that when you go to the

1 authorities you have a serious case? Was that their  
2 recommendation to you?

3 A Yes, they said that I should just start kind of  
4 collecting things because unfortunately sometimes,  
5 especially with this type of situation, people don't  
6 really take it seriously.

7 Q And that was intended to avoid the  
8 he-said-she-said, correct?

9 A Yes, sir.

10 Q Okay. And the Court was questioning Exhibit 6,  
11 which is the DeMint exchange with Braddock May 30, where  
12 it stated he was going to -- Braddock was going to "take  
13 you out, no questions asked". Do you recall if Mr. DeMint  
14 called you and told you about that text prior to him  
15 sending it to you in -- in -- I guess I think you said  
16 around June '18 or so.

17 A I was contacted, actually, by a third party  
18 associated with DeMint. And at the time, Brad wanted to  
19 remain anonymous because he was afraid that the media  
20 would basically smear his reputation. So he wanted me to  
21 know that he had received something, but that Braddock was  
22 basically someone I should stay away from and they wanted  
23 to just make me aware of it. And then, he later on came  
24 forward with that.

25 Q Okay. So you knew about that threat from Mr.



1 Braddock of May 30 prior to filing your petition, correct?

2 A I -- I believe I had been made aware of it from  
3 a third party connected to Brad DeMint.

4 Q Okay. Thank you.

5 MR. PERLMAN: That's all I have.

6 THE COURT: Okay. Any questions, Ms. Janes?

7 MS. JANES: No, Your Honor. Thank you.

8 THE COURT: Okay. All right. Mr. Hayslett?

9 MR. HAYSLETT: No, Judge.

10 THE COURT: Okay. All right. All right. It's  
11 5:50. So it does seem like Mr. Braddock is  
12 potentially a witness. There might be argument, I  
13 don't know. But it does seem like we're going to  
14 need to continue this for the remainder of this  
15 hearing. So I can -- I mean, I can do as early as --  
16 let's see -- with the additional holiday this week it  
17 makes it a little bit harder. I could do as early as  
18 Thursday -- or Friday at 12:30.

19 MR. HAYSLETT: Judge, it's --

20 MR. PERLMAN: Judge?

21 MR. HAYSLETT: Go ahead.

22 MR. PERLMAN: I think, you know, we're going to  
23 need a return date no matter what. But I did have a  
24 suggestion for the Court that may save us some time,  
25 if -- if you will let me know when I can present

1           that.

2           THE COURT:  Yeah.

3           MR. PERLMAN:  My -- my understanding, and I  
4           would let Mr. Hayslett confirm on the record, is that  
5           Mr. Braddock is going to assert his Fifth Amendment  
6           right, which is what he did during his deposition.  
7           And so what we would be doing is, instead of calling  
8           him, and trying to save judicial resources and  
9           everybody else's time, which you have been very  
10          generous about, we did a notice of filing of the  
11          deposition transcript.  And I would, within just a  
12          couple minutes, publish some line and page numbers in  
13          terms of the -- the testimony that was provided in  
14          the form of the Fifth Amendment.  And we would be  
15          seeking an adverse inference under Florida law and  
16          the U.S. Supreme Court.  We can argue that another  
17          time, but my point is, based on his assertion of the  
18          Fifth, it seems like we can get his testimony in  
19          rather quickly.

20          THE COURT:  Mr. Hayslett?

21          MR. HAYSLETT:  No objection to that, Judge.

22          THE COURT:  Okay.  All right.  So does it -- so  
23          I guess will we be able to close the evidence in the  
24          case and just be able to go to arguments and caselaw  
25          or anything like that?  Is that what we're saying?

1           MR. HAYSLETT: Well, Judge, I may have questions  
2 for Ms. Olzewski. And -- and I actually want to --  
3 if -- I don't know when you're going to -- I may call  
4 her for the purpose of some other things.

5           MS. JANES: Your Honor, if I could -- if I could  
6 just make a brief point with regard to Mis -- Mr.  
7 Hayslett's desire to call Ms. Olzewski, his -- his  
8 suggestion or -- or his -- his contention earlier was  
9 that he was taken by surprise that Ms. Olzewski had  
10 recorded the voice text. And -- and I was kind of  
11 surprised by that because I thought it had been  
12 discussed in her deposition.

13           And from just a very quick review of her  
14 deposition, I quickly located three different points  
15 in Ms. Olzewski's deposition, which took place on  
16 August 31st, where Ms. Olzewski did testify that she  
17 had recorded the voice texts. Mr. Braddock nor his  
18 counsel never made any discovery requests for those  
19 recordings.

20           So I'm -- to the extent that Mr. Braddock is  
21 claiming some sort of unfair surprise, Mr. Braddock  
22 has been aware of what our exhibits were since at  
23 least July 30th or 31st and he took her deposition,  
24 in which she testified at least three times to having  
25 recorded the voice texts and Mr. Braddock made no

1 request for them.

2 THE COURT: Okay.

3 MS. JANES: So I'm -- I'm a little unsure of --  
4 of what the basis for any such argument would be.

5 MR. HAYSLETT: Well, she --

6 MR. PERLMAN: And -- and Judge, if I can just  
7 add to that because I thought at the beginning, we --  
8 Your Honor established some ground rules and that the  
9 witnesses would be available outside the scope of  
10 direct for this very purposes. And because of that,  
11 we allowed a lot of questions outside the scope of  
12 direct. So I'm just a little confused as to that  
13 procedure that Your Honor instructed us and we all  
14 agreed to, and now wanting to recall a witness after  
15 they -- they more or less completed their  
16 presentation of the evidence.

17 MR. HAYSLETT: I would be calling them in my  
18 case, Judge, not their case. The other thing,  
19 Judge --

20 THE COURT: But -- but --

21 MR. HAYSLETT: -- is -- is that the indication  
22 I've got was the voice text disappeared and there's  
23 no prejudice to have her play the voice text. She  
24 said she has them, she recorded them. As we've  
25 talked about --

1 MS. JANES: Your Honor?

2 MR. HAYSLETT: -- it's not illegal to have those  
3 voice texts. And I think for the purposes of  
4 context, the Court should have the complete  
5 statements of Mr. Braddock that was given to Ms.  
6 Olzewski, the one that she claims that was pa --  
7 played to Ms. Luna and the one that was played and  
8 given to law enforcement. These were not illegally  
9 obtained. They were voice texts. There's no  
10 prejudice to the petitioners. That way, the Court  
11 would have Mr. Braddock's actual voice, exactly what  
12 he said to Ms. Olzewski that night, and she said she  
13 has them on her iPad.

14 MR. PERLMAN: Doe -- doesn't he -- or didn't Mr.  
15 Braddock have these?

16 MR. HAYSLETT: Nope.

17 MR. PERLMAN: He sent them.

18 MR. HAYSLETT: Nope.

19 THE COURT: All right. So --

20 MS. JANES: Your Honor, if I could just -- I  
21 apologize. If I could just clarify the -- and I can  
22 give, if -- if Mr. Hayslett would like, page and  
23 line --

24 THE COURT: Okay. Hold on just a minute.

25 MS. JANES: -- of the three times in the

1 deposition where she specifically indicated that she  
2 had recorded the voice texts.

3 THE COURT: No. Were there any times where she  
4 said that she had the recordings of the voice texts?

5 MS. JANES: Gosh, let me pull up her deposition.

6 MR. HAYSLETT: She said they disappeared. I  
7 thought they were -- didn't exist. That's what she  
8 said --

9 MS. JANES: And that's why she recorded them and  
10 she brought them in her --

11 MR. HAYSLETT: She gave the impression that they  
12 disappeared and she didn't retain them. I mean,  
13 obviously I think the best evidence would be exactly  
14 what Mr. Braddock said that night. It would give  
15 this Court some real clarity to the --

16 THE PETITIONER: Am I able to comment to --

17 THE COURT: Well, I'm -- I'm trying to find  
18 out --

19 THE PETITIONER: Okay.

20 THE COURT: A little bit about this. I mean, I  
21 guess those arguments and inferences can be made  
22 either way, why they're not being produced if they  
23 are so concerning. So --

24 MS. JANES: Your Honor, I -- I'm -- frankly,  
25 it's been -- it's -- it was my decision not to

1 produce any recordings of anything. It was -- being  
2 candid with the Court or being, I guess, open with  
3 the Court, out of concern for the Fifth Amendment  
4 rights that Ms. Olzewski ultimately chose not to  
5 assert --

6 THE COURT: Um-hum.

7 MS. JANES: -- that no recordings of any kind  
8 were produced. Ms. Olzewski I think very  
9 courageously chose not to stand on those rights. She  
10 made that decision well after the time at which we  
11 were required to have exchanged exhibits. So we have  
12 not prepared those as exhibits.

13 THE COURT: Okay. We will readdress these at  
14 the start of the next -- but I guess what I need to  
15 do is have the -- them -- I mean, we're talking about  
16 something that Mr. Hayslett potentially has not even  
17 heard. So I don't even know, if he hears them, he's  
18 even going to be asking to move them into evidence.

19 MR. HAYSLETT: That's true.

20 THE COURT: He might decide that he really  
21 doesn't want me to hear them. I don't know. But I  
22 think that there is some evidentiary value when it  
23 comes to verbiage and context. And -- and I do agree  
24 we're not talking about something that's  
25 inadmissible. We're talking about -- and -- and I've

1 read caselaw where it says about third-party threats.  
2 You know, sometimes it gets into, you know, not only  
3 the words that are said, but how they're said. And  
4 so in the context of the situation.

5 So I do think that they are relevant, but I need  
6 to -- them to be exchanged and then we can have a  
7 discussion about them. Maybe Mr. Hayslett, at this  
8 poi -- that point is not going to be asking for them,  
9 I don't know.

10 MS. JANES: And -- and Your Honor, if I may, I  
11 just received a communication from my client and her  
12 request would be that she just -- she's -- she's  
13 going to go ahead and play them right now, if the  
14 Court would desire.

15 MR. HAYSLETT: That's fine.

16 THE COURT: I mean, that's fine with me.

17 MR. HAYSLETT: Judge, here's the prob -- we're  
18 going to do that, I may have some more questions for  
19 her. It's 6 o'clock right now. My recommendation  
20 would be, if she wants to exchange them we can come  
21 back. It would be very short after that. We can go  
22 into closing argument and make any other decisions  
23 about any other evidence we want to present.

24 THE COURT: I'm fine with that, but the soonest  
25 that I can do that is 12:30 on Friday because of the



1 Court holiday on the 16th. I cannot do it  
2 tomorrow.

3 MR. HAYSLETT: It's -- it's -- it's --

4 MS. JANES: Your Honor, I apologize.

5 THE COURT: Go ahead.

6 MR. HAYSLETT: No. It's -- it's my -- my  
7 youngest goes to West Point. He's got parents  
8 weekend. I've got one weekend to see him this fall.

9 THE COURT: Okay. Are you back on Monday?

10 MR. HAYSLETT: I am back on Monday.

11 THE COURT: All right. Let me see what Monday  
12 looks like. I would be having to ask Judge Gnage to  
13 do me a favor and cover my Monday because --

14 MS. JANES: Your Honor, I apologize. I've got a  
15 hearing in federal court on Monday.

16 THE COURT: Okay.

17 MR. PERLMAN: Is it in the morning, Ms. Janes?

18 MS. JANES: No. It is in the afternoon. So if  
19 we could do first thing in the morning on Monday,  
20 that could work. As long as --

21 MR. PERLMAN: Well, I asked because I've got a  
22 conflict that morning.

23 THE COURT: Oh, okay.

24 MS. JANES: Oh, okay. Sorry.

25 THE COURT: All right. And I know I just

1 rescheduled something for Friday the 24th. However,  
2 I don't see it on my schedule, so let me look and see  
3 if I can -- I think it was pretty early. My  
4 assistant might be in this room.

5 MR. HAYSLETT: We're available the 24th, Judge.

6 THE COURT: All right. Well, let me see. I  
7 have -- let me find out what I have that morning, but  
8 I'm -- click on that.

9 Okay. All right. Suzie (phonetic), I don't  
10 know if you can hear me. Can you look on the -- on  
11 my desk, on the case where the people are in New  
12 Orleans. Can you see what time I scheduled their  
13 arguments for on the 24th?

14 MR. PERLMAN: Who knew your jurisdiction was so  
15 large.

16 THE COURT: Just never know what you're going to  
17 hear.

18 Okay. I'm not sure if she heard me or not. I  
19 might just have to step off the bench briefly. But I  
20 would be looking for -- I have a return hearing set  
21 that morning for -- let me see -- for two hours, so  
22 it would be after 11. Let me just step off briefly.  
23 I think I just have -- I'm sure I set the next  
24 hearing at 11:30. So let me briefly step off and  
25 find out that information and be right back.

1 THE BAILIFF: All rise. Court's in recess.

2 Please follow the Court.

3 (Recess.)

4 THE BAILIFF: All rise. Circuit court's back in  
5 session.

6 THE COURT: All right. I did find that hearing.  
7 It -- that hearing isn't until 1. So I can start at  
8 1 or I can start at 1:30.

9 MR. PERLMAN: Why don't we give Your Honor a  
10 break and start at 1:30.

11 THE COURT: I'm not used to that, so -- but I  
12 will appreciate it. Because sometimes things go  
13 later. So likely, I won't really have a break, it  
14 will just carry over, but all right.

15 So let's do September 24th at 1:30.

16 MR. HAYSLETT: Perfect.

17 THE COURT: In the order of continuance, it's  
18 going to say that the injunction is continued and it  
19 remains in full force and effect until further order  
20 of the Court, just in case there's any additional  
21 things.

22 And then, by Friday, can we send those  
23 recordings to Mr. Hayslett.

24 And then, Mr. Hayslett, if you're not intending  
25 on introducing them, could you just let other counsel

1 know?

2 MR. HAYSLETT: I'll let the counsel know, yeah,  
3 absolutely.

4 THE COURT: And that way they can decide whether  
5 they want to introduce them or not.

6 MR. HAYSLETT: Sure, sure.

7 THE COURT: And then, we'll discuss it then.

8 MR. HAYSLETT: Perfect.

9 MS. JANES: Your Honor, I'm so sorry because I  
10 just -- I realized there is something on my  
11 calendar on the 24th. I thought it was wide open.  
12 But it's not until 3:30, but I will have a hard stop  
13 at 3:30. I mean, I can't imagine that this is going  
14 to take --

15 THE COURT: I mean, that's --

16 MS. JANES: -- past 2:30.

17 THE COURT: -- that's completely fine with me.  
18 I mean, I -- I would rather say, then, let's start at  
19 1 o'clock.

20 MR. HAYSLETT: Yes.

21 THE COURT: Because I would rather do that. So  
22 we'll start at 1 o'clock. Sorry, Suzie.

23 MS. JANES: Hey, I'm sorry. And I -- I just  
24 realized I -- I overlooked that and -- and so I -- I  
25 have to get off at 3:30.

1 THE COURT: Okay. No worries. I would rather  
2 (unintelligible)

3 MS. JANES: But I think that should give us more  
4 than enough time, but --

5 THE COURT: Okay.

6 MR. PERLMAN: Your Honor, real quick  
7 housekeeping. Is it going to be the same Zoom  
8 information?

9 THE COURT: Yes.

10 MR. PERLMAN: Okay. And I wanted to move into  
11 evidence the notice of filing of the depo  
12 transcript.

13 THE COURT: Okay.

14 MR. PERLMAN: We could mark that as new Exhibit  
15 9.

16 THE COURT: Okay. Any objection, Mr. Hayslett?

17 MR. HAYSLETT: No objection.

18 THE COURT: Okay. It will be so received.

19 MR. HAYSLETT: And Judge, I just need a  
20 stipulation on the record from Mr. Hayslett so that  
21 we can dispense with calling Mr. Braddock that if  
22 called Mr. Braddock would assert his Fifth Amendment  
23 right with regard to any question concerning these  
24 matters.

25 MR. HAYSLETT: That's correct.

1 THE COURT: Okay.

2 MR. PERLMAN: All right.

3 THE COURT: There we go. All right. So it will  
4 be the one evidentiary issue related to Ms. Olzewski  
5 and those voice text recordings or we'll just -- if  
6 that become -- that issue resolves itself or -- or  
7 one way or the other, then we'll go straight into  
8 closings.

9 So we'll see everybody back on the 24th at 1  
10 p.m. I'm not sure which courtroom because this judge  
11 will be back, but all -- the Zoom link will be the  
12 same and we won't have as many Zoom issues because  
13 it's --

14 MR. HAYSLETT: Less people.

15 THE COURT: -- a Friday, so we don't use this  
16 Zoom link on Fridays. We use different Zoom links on  
17 Fridays.

18 MR. PERLMAN: Judge, on behalf of all the  
19 parties, thank you so much for the generous time.

20 And Mr. Hayslett, have a excellent trip.

21 MR. HAYSLETT: Thank you.

22 MS. JANES: Absolutely. Thank you, Your Honor.

23 THE COURT: All right. Thank you, everyone.

24 Mr. Braddock, the injunctions are still in --  
25 remaining in full force and effect. If you have any

1           questions, ask your attorney. Okay. Have a good  
2           day.

3                   MR. HAYSLETT: Thank you, Judge.

4                   MR. PERLMAN: Thank you, Judge.

5 (Proceedings concluded.)

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