## Robert Jacobson Deposition Summary

Scarlett Lewis v. Alex E. Jones, Infowars, LLC, and Free Speech Systems, LLC

### **DEPOSITION ABSTRACT**

Robert Jacobson, a former employee of InfoWars from 2004 to 2017, provided testimony in a deposition related to the Sandy Hook lawsuits against Alex Jones and InfoWars. Jacobson discussed his experience at InfoWars, including changes in the company's size and journalistic approach over the years. He expressed concerns about the lack of proper fact-checking and the irresponsible handling of the Sandy Hook coverage by InfoWars writers, particularly their reliance on Wolfgang Halbig's claims without adequate evidence. Jacobson criticized the use of the term "crisis actors" in relation to Sandy Hook and the lack of evidence to support such allegations. He also described instances of what he considered "agitation" by InfoWars staff, which he believed was not true journalism. Jacobson shared his personal objections to the Sandy Hook coverage with his coworkers and felt guilty about not taking more decisive action against it. He confirmed his technical expertise in video technology and discussed a video clip from an InfoWars episode, explaining that it did not clearly indicate a blue screen event. Jacobson also mentioned his EEOC complaint against Alex Jones and InfoWars for abusive behavior and a racist and anti-Semitic work environment. Jacobson stated that he does not stand to benefit from the Sandy Hook parents' lawsuits against Alex Jones and that his testimony is based on his personal experiences and the truth. He expressed discomfort with the deposition process, feeling that he was being "tag-teamed" with unexpected questions.

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### **EXAMINATION**

#### Robert Jacobson Introduces Himself in a Deposition Testimony

<u>Topic</u>	<u>Summary</u>
- Introducing Himself	Robert Jacobson introduced himself. (4:13 - 4:15)

During a Deposition, There Was a Dispute Between Mr. Bankston and Mr. Enoch About Questioning Witness Robert Jacobson

Topic Summary
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	Robert Jacobson was questioned by Mark Enoch about whether he had received a subpoena, as
	Enoch believed Jacobson was bound by a non-disclosure and confidentiality agreement and
	could not testify without one. Mark Bankston disputed this, asserting that Enoch had no court
- Dispute over	orders to question any witness and threatened to suspend the deposition and seek sanctions if
Subpoena and	Enoch continued to interact with Jacobson. Bankston confirmed that he had served a Notice of
Confidentiality	Deposition on Jacobson, but Enoch maintained that Jacobson could not testify without a
Agreement	subpoena due to his non-disclosure and confidentiality agreement. Bankston accused Enoch of
	disrupting the deposition and stated that Enoch had no grounds to question Jacobson about
	confidentiality as he had already informed him of his obligations. Despite this, Enoch persisted
	in asking Jacobson about his receipt of a subpoena. (4:16 - 21:18)

# Robert Jacobson Testified About His Time at Infowars, Criticizing Its Journalistic Practices, Handling of the Sandy Hook Story, and Use of Green Screen Technology

<u>Topic</u>	<u>Summary</u>
- Identity	Robert Jacobson confirmed his identity for the record. (21:19 - 21:25)
Confirmation	
- Previous InfoWars	Robert Jacobson confirmed his previous employment at InfoWars. (22:1 - 22:2)
Employment	
- Hired by Alex Jones	Robert Jacobson stated that he was employed by InfoWars in 2004, and that he was hired by
as independent	Alex Jones. He further mentioned that at the time of his hiring, he believed he was employed by
proprietor.	Alex Jones, whom he perceived as an independent proprietor. (22:3 - 22:9)
- Knowledge of Free	Robert Jacobson knows the entity, Free Speech Systems, LLC, that his former employer claims
Speech Systems,	he worked for. (22:10 - 22:14)
LLC	
- End of InfoWars	Robert Jacobson stated that his employment concluded on either April 30th or May 1st of 2017.
Employment	He confirmed his employment at InfoWars spanned approximately 13 years. (22:15 - 22:21)
- Employee	Robert Jacobson worked at InfoWars from 2004 to 2017 and did not have a confidentiality
threatened with	agreement for the first six years of his employment. Around 2010, the concept of confidentiality
ultimatum for	was introduced, but Jacobson did not receive the agreement until years later. He characterized
confidentiality	the presentation of the confidentiality agreement as an ultimatum that threatened his livelihood.
agreement.	(22:22 - 23:5)
- Exhibit 2	Robert Jacobson was presented with an item labeled as Exhibit 2. Despite an objection and a
Objection/Motion to	motion to strike from Mr. Enoch, Exhibit 2 was still marked. (23:6 - 23:12)
Strike	
- Familiarity with	Robert Jacobson confirmed his prior familiarity with a copy of Exhibit 2. (23:13 - 23:16)
Exhibit 2.	
	Robert Jacobson confirmed his understanding and adherence to the confidentiality non-
	disclosure agreements with Alex Jones or Free Speech Systems, LLC. He interpreted the
	agreement as a prohibition against revealing company secrets, but did not consider abusive
- Exposing InfoWars	behavior or misbehavior within the company as such secrets. Jacobson was present to discuss the
Abuses	truth about abusive behavior within InfoWars, and did not believe his testimony would breach
	the non-disclosure agreement. He assured he would not disclose any company secrets or news
	production methods, but intended to expose the behavior of Mr. Jones and his staff. (23:17 -
	24:16)
TT 1 O 1 1	Robert Jacobson expressed uncertainty regarding whether a judge in Travis County had issued
- Uncertain Order in	an order related to his deposition, describing his understanding of the situation as "fuzzy". (24:17)
Travis County	- 24:22)
- Observing Court	Robert Jacobson remembers observing a court order related to his deposition. (24:23 - 24:25)
Order	
TT	Robert Jacobson was unsure about his comfort level in appearing for the deposition without a
- Uncertain	court order. However, he held the belief that his participation in the deposition was the
Participation	appropriate action to take. (25:1 - 25:9)



- Belief in Mission	Robert Jacobson stated that he initially believed in the mission of InfoWars when he first joined
- Defici ili Missioli	the company. (25:10 - 25:12)
- Fringe Media Honesty.	Robert Jacobson shared that his initial perception of InfoWars, when he began his employment there, was that the company and its subject matter, led by Alex, concentrated on the occult, esoteric politics, and undisclosed activities of politicians. He characterized it as fringe media that deviated from mainstream narratives, yet maintained honesty. (25:13 - 25:23)
- Passion for Documentary Filmmaking	Robert Jacobson expressed that in his early days with InfoWars, he was driven by a passion for filmmaking, with a specific aspiration to become a documentary filmmaker. He held the belief that this ambition was part of the wider field of journalism, especially in the context of documentary films. (25:24 - 26:7)
- High-quality journalism at InfoWars	Robert Jacobson intended to engage in high-quality journalism when he first joined InfoWars. (26:8 - 26:21)
- Objective Fact- Based Journalism	Robert Jacobson defined "good journalism" as the objective reporting of facts, emphasizing the importance of empirical evidence and minimal bias. He further explained that it requires a journalist to remove their emotions and theories as much as possible from their reporting, focusing on firsthand observations. (26:22 - 27:4)
- Multiple perspectives for accurate reporting	Robert Jacobson expressed his belief that good journalism is closely related to the corroboration of facts. He argued that the more witnesses and perspectives there are on a reported action or activity, the more accurate the reporting will be. He used the analogy of a single person being unable to see both sides of a cup at once to illustrate the importance of multiple observers in providing a comprehensive description of an event. Jacobson concluded by stating that the more witnesses there are, the more impressions can be gathered about what actually happened. (27:5 - 27:17)
- Belief in InfoWars mission and interest in occult, esoteric politics.	Robert Jacobson stated that he joined InfoWars due to his belief in its mission and his interest in working on stories related to the occult, esoteric politics, and undisclosed information by politicians. He defined journalism as an objective reporting of facts with minimal bias. When questioned about his comfort level with the style of journalism and the stories he was working on during his initial years at InfoWars, an objection was raised by Mark Enoch, the defendants' counsel. Enoch clarified that Jacobson could answer despite the objection unless it was based on a privilege. Jacobson agreed to this and requested the question to be repeated. (27:18 - 28:8)
- Early InfoWars Years: Comfortable Journalism & Interesting Films.	During his early years at InfoWars, Robert Jacobson was comfortable with the journalistic style and the stories he worked on. He found the films he produced and helped Alex produce to be interesting. Jacobson also believed that Alex provided sufficient expert testimony to lend credibility to the stories. (28:9 - 28:16)
- Sandy Hook Lawsuit	Robert Jacobson confirmed his understanding that the lawsuit being discussed in the deposition pertains to Sandy Hook. (28:17 - 28:19)
- Company changes in 2013 and pause for objections.	Robert Jacobson confirmed that there were changes in the company by the beginning of 2013. He also agreed to Mr. Bankston's request to pause before answering questions to prevent disruption from Mr. Enoch's objections. (28:20 - 29:17)
- Importance of Conversation Etiquette	Robert Jacobson acknowledged the importance of not talking over each other or finishing each other's sentences during conversations, as it could potentially complicate the task for an unidentified third party, possibly the court reporter. (29:18 - 29:23)
- InfoWars' Dramatic Transformation	Robert Jacobson stated that InfoWars, where he was employed, underwent significant changes since he joined. He noted that it was initially a small operation with about five employees, including himself, working from his private office. The owner, Alex Jones, had a small office in south Austin with one known employee, Ryan Schlickeisen, and another female employee, whose name Jacobson couldn't remember, managed a warehouse in the same area. Jacobson was uncertain about Jones's broadcasting location at that time. By 2010, InfoWars had expanded into a large operation with a full-size facility, a comprehensive studio, and over 60 staff members. Jacobson characterized this transformation as dramatic. (29:24 - 31:1)
- Shift in InfoWars' Journalism and Fact- Checking	Robert Jacobson noticed a shift in InfoWars' journalistic approach during his tenure, with the company's founder, Alex Jones, moving from a mix of website content, films, and radio shows to a focus on the radio show and website. Jacobson considered the removal of films from the media



- Troubled by Speculative Coverage - Sandy Hook Incident: InfoWars	mix a significant change. He also noted a change in the company's fact-checking process, with Jones initially being the primary researcher but later delegating this task to others, whose qualifications Jacobson questioned. Jacobson reached out to the plaintiff's counsel, Mark D. Bankston, about the case, feeling complicit in the company's actions, even though he was not directly involved in the dissemination of content related to the Sandy Hook incident. He clarified that he had no involvement in any of InfoWars' content concerning Sandy Hook. (31:2 - 33:5)  Robert Jacobson, while working at InfoWars, had limited exposure to the company's coverage of Sandy Hook due to his other responsibilities. When he did come across it, he was troubled by the accusations made from very limited information. Jacobson tried to inform the writers and staff that their actions were speculative and lacked adequate information. He was upset by what he saw as a disregard for journalistic ethics. (33:6 - 33:19)  Robert Jacobson communicated his concerns about InfoWars' coverage of the Sandy Hook incident to the company's writers, emphasizing the violation of journalistic ethics. He did not constantly focus on this issue due to other work responsibilities, but addressed it whenever the
Writers' Room Laughter	Sandy Hook story appeared on InfoWars. Despite his four to five visits to the writers' room to discuss the matter, his concerns were met with laughter and jokes. The room he referred to is where the writers worked. (33:20 - 34:17)
- Sandy Hook coverage by InfoWars.	Robert Jacobson stated that InfoWars' coverage of Sandy Hook involved two writers, with one serving as the primary writer and another possibly involved. (34:18 - 35:4)
- Sandy Hook Coverage Exposure	Robert Jacobson had exposure to InfoWars' coverage of Sandy Hook. (35:5 - 35:9)
- Awareness of Reckless Sandy Hook Coverage at InfoWars	Robert Jacobson was aware of every staff member that worked at InfoWars until May 2017. He observed actions he considered reckless in the coverage of Sandy Hook by the writers at InfoWars. (35:10 - 35:22)
- Reckless Conduct at InfoWars Regarding Sandy Hook	Robert Jacobson believed that until May of 2017, there were individual employees at InfoWars who engaged in reckless conduct regarding Sandy Hook. (35:23 - 36:4)
- Views on Rob Dew's Sandy Hook Work	Robert Jacobson formed views regarding the work on Sandy Hook by Rob Dew, an InfoWars employee until May 2017. (36:5 - 36:8)
- Excessive enthusiasm for Sandy Hook conspiracy.	Robert Jacobson noted that Mr. Dew showed excessive enthusiasm for any suggestion that the Sandy Hook incident could have been a staged act, and would celebrate any hint of this possibility. (36:9 - 36:17)
- Acquaintance with InfoWars employee	Robert Jacobson confirmed his acquaintance with Adan Salazar, an employee at InfoWars. (36:18 - 36:19)
- Sandy Hook Worker	Robert Jacobson observed Adan Salazar working on Sandy Hook. (36:20 - 36:22)
- Opinion on Adan Salazar's Work on Sandy Hook	Robert Jacobson holds an opinion on whether Adan Salazar's work on Sandy Hook was carried out responsibly. (36:23 - 37:1)
- Journalistic Ethics Breach	Robert Jacobson clarified to the writers, including Adan Salazar, that they were breaching journalistic ethics by accepting the word of one witness and a few speculative facts as truth without conducting their own investigation or corroborating the information. He specifically cautioned Salazar about the potential damage and irresponsibility of heavily relying on Wolfgang Halbig's word due to the serious nature of his accusations. Jacobson also advised Salazar to consider the size of their audience. Salazar, however, responded by expressing his wish to print T-shirts and bumper stickers saying "Halbig was right," a suggestion that was met with laughter in the room. (37:2 - 38:1)
- Colleague disregarded ethical concerns on Sandy Hook coverage.	Robert Jacobson expressed his belief that Adan Salazar, a colleague at InfoWars, completely disregarded his concerns regarding violations of journalistic ethics and irresponsible reporting on the Sandy Hook coverage. He also acknowledged that he brought up the name Mr. Halbig. (38:2 - 38:10)



- Frequent contributor's unverified accusations damage Sandy Hook story.	Robert Jacobson identified Wolfgang Halbig as a frequent contributor whenever Sandy Hook was discussed on air, and believed Halbig was the primary individual making claims about the event. Jacobson raised concerns about Halbig's mental and emotional wellbeing, suggesting he might be seeking attention due to loneliness. He criticized the decision to air Halbig's accusations - that the parents of children killed at Sandy Hook were lying - without first verifying Halbig's credibility. Jacobson insisted that the story should not have been publicized without adhering to proper journalistic ethics, which he felt were not observed. He concluded that the publication of the story resulted in damage. (38:11 - 39:15)
- Doubts about Halbig's Credibility	Robert Jacobson expressed strong doubts about the credibility of Mr. Wolfgang Halbig as the only witness. He was uncertain about Halbig's contacts at InfoWars, but speculated that it might be the individuals managing the Sandy Hook story. Jacobson also acknowledged his familiarity with some of the assertions made by Halbig. (39:16 - 41:5)
- Sandy Hook school closure claim and irresponsible behavior.	Robert Jacobson confirmed that he heard the assertion from Mr. Halbig, or someone else repeating it, that Sandy Hook school was closed prior to the shooting. He also agreed that he saw individuals behaving irresponsibly regarding this assertion during his tenure at InfoWars. He specifically named Mr. Robert Dew and Mr. Adan Salazar as those who acted irresponsibly in relation to the claim. (41:6 - 41:24)
- Paramedics Denied Entry	Robert Jacobson has knowledge of the claim that no paramedics were allowed inside of the building. His familiarity with this claim is not from direct exposure, but from briefly watching it on a video as an audience member. (41:25 - 42:7)
- Awareness of Claim of Photos of Allegedly Dead Children Being Alive	Robert Jacobson confirmed his awareness of the claim, purportedly made or repeated by Mr. Halbig, that there exist photographs of children who are allegedly dead but are in fact alive. (42:8 - 42:11)
- Distasteful Allegations Improperly Handled	Robert Jacobson found the allegations distasteful and believed they were improperly handled. He mentioned that these allegations were made a while ago and he viewed them as individual cross-sections of information. (42:12 - 42:23)
- Jacobson's criticism of InfoWars' Sandy Hook story.	Robert Jacobson criticized Mr. Halbig's points of contact at InfoWars and their handling of the Sandy Hook story during his time at InfoWars. He conveyed this criticism to Adan Salazar.  (42:24 - 43:4)
- Parent of Sandy Hook and Leonard Pozner acquaintance.	Robert Jacobson knows Leonard Pozner, a parent from Sandy Hook, but he has not seen any written communications or emails from Mr. Halbig. (43:5 - 43:11)
- Awareness of Halbig's Austin Visit	Robert Jacobson was not aware if Mr. Halbig ever visited the InfoWars location in Austin. (43:12 - 43:14)
- Uncertainty of InfoWars Involvement with Halbig	Robert Jacobson was uncertain about whether anyone from his previous employer, InfoWars, had ever visited Mr. Halbig in Florida. He also professed ignorance regarding InfoWars' potential involvement in fundraising for Mr. Halbig. (43:15 - 43:21)
- Harassment-Free Behavior Towards Sandy Hook Participants	Robert Jacobson has never heard of Mr. Halbig engaging in any sort of harassing behavior towards people involved in Sandy Hook, including the parent Leonard Pozner. (43:22 - 44:1)
- Knowledge of Dan Bidondi	Robert Jacobson confirmed his knowledge of Dan Bidondi. (44:2 - 44:3)
- On-air reporter and journalist at InfoWars.	Robert Jacobson stated that Mr. Bidondi was employed at InfoWars for about a year, in the capacity of an on-air reporter and journalist. (44:4 - 44:8)
- Uncertainty of Bidondi's Newtown Visit	Robert Jacobson was uncertain if Dan Bidondi, a former on-air reporter and journalist for InfoWars, had ever traveled to Newtown to report on the Sandy Hook event. Jacobson also verified that he has met Mr. Bidondi. (44:9 - 44:13)
- Unprofessional, Confrontational,	Robert Jacobson would not select Dan Bidondi to handle the Sandy Hook story with sensitivity and respect due to his emotional and belief-based approach. Jacobson views Bidondi more as a character than a journalist, and is concerned that his impassioned and impressionable nature



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Conspiracy-Driven	could lead to biased, over-emotional, and unfair reporting, particularly in conspiracy situations.
Reporting	Jacobson noted that Bidondi is drawn to conspiracy scenarios, as evidenced by his work at
	InfoWars, which often involves the occult and conspiracy theories. He cited Bidondi's
	unprofessional conduct during the Boston bombing reporting, where he made a spectacle of
	himself, contributing to his popularity at InfoWars. Jacobson also pointed out that Bidondi's
	confrontational style, which involved making accusations rather than asking questions during the
	Boston bombing situation, was celebrated at InfoWars. (44:14 - 46:13)
	Robert Jacobson shared his experience at InfoWars, stating that public agitation was beneficial
- Agitating Career at	for a person's career there. He provided several instances where the staff's actions were not
InfoWars	related to reporting but were purely agitating. Jacobson criticized this behavior, indicating that
	some of it was so disruptive that it nearly amounted to public disruption. (46:14 - 47:4)
	Robert Jacobson described an instance of what he termed "agitation" by InfoWars staff. He
	recounted an event where Ms. Millie Weaver attended a Hillary Clinton book signing at
	BookPeople, not to protest or campaign, but dressed in Trump gear. Jacobson believed this was a
- InfoWars Agitation	deliberate attempt to politically agitate. He found it unusual that Weaver, identifying herself as a
at BookPeople	
	journalist, was wearing political gear and asking abrasive questions about Hillary Clinton.
	Jacobson concluded that this was not journalism but agitation, and he perceived it as InfoWars
	substituting the term "agitation" for "journalism" and vice versa. (47:5 - 48:6)
	Robert Jacobson stated he was never part of planning conduct intended to provoke negative
	emotional reactions from interview subjects at InfoWars. He had not worked closely with Millie
	Weaver or Owen Schroeder, but believed Schroeder, being intelligent, should know the
- Inciting Emotional	difference between a journalist and an agitator. Jacobson suggested that Schroeder's decision to
Responses	wear Trump hats at political events could be interpreted as an attempt to incite emotional
	responses. He clarified he was never involved in discussions about instigating fights, but
	believed Schroeder and others should be more cautious about wearing items that could
	potentially stir people's emotions. (48:7 - 49:8)
- Sandy Hook Parent	During his tenure at InfoWars, Robert Jacobson did not hear anyone within the organization
Sentiments at	express negative sentiments about the Sandy Hook parents, apart from what Alex publicly stated
InfoWars	on air. (49:9 - 49:13)
	Robert Jacobson confirmed his discomfort with Alex Jones' on-air comments, particularly those
	about the Sandy Hook parents on the InfoWars set. He was disturbed by the discussion of Mr.
- Disturbing	Pozner's emotional changes during a broadcast, which ranged from laughter to seriousness.
Discussion of Sandy	Jacobson tried to explain to others, including Mr. Salazar, that it's not unusual for someone to
Hook Parent's	display a range of emotions, including laughter and smiles, after a tragedy. He expressed his
Emotions	disgust and attempted to clarify that people's emotions can fluctuate widely following a
	traumatic event. (49:14 - 51:2)
- "InfoWars Crisis	Robert Jacobson heard the term "crisis actors" during his time at InfoWars. (51:3 - 51:5)
Actors"	Robert Jacobson heard the term crisis actors adding his time at hirowars. (51.5-51.5)
Actors	Robert Jacobson interprets the term "crisis actors" as individuals possibly from Special Forces or
- Government-funded	
	similar groups, potentially managed by the government or financed by special interest money.
false events.	He believes these individuals may orchestrate false events, such as pretending their own deaths,
#G 1 TT 1 G : :	with the intention of swaying policy changes. (51:6 - 51:15)
- "Sandy Hook Crisis	Robert Jacobson confirmed that while he was at InfoWars, he heard the term "crisis actors" or
Actors Allegations"	similar allegations being associated with the Sandy Hook event. (51:16 - 51:20)
- Sandy Hook "Crisis	During his tenure at InfoWars, Robert Jacobson did not observe any evidence that he deemed
Actors"	adequate to responsibly label the Sandy Hook event with the term "crisis actors" or a similar
Unsubstantiated	allegation on air. (51:21 - 52:1)
	Robert Jacobson shared his personal sentiments regarding the claim of crisis actors being used at
- Lack of Evidence	Sandy Hook, expressing shock at the lack of thorough research before making such an
for Crisis Actors at	accusation. He stressed the importance of having sufficient evidence before presenting a story of
Sandy Hook	such gravity, likening it to the preparation required for a court case. Jacobson asserted that
	without such evidence, there is no story. (52:2 - 52:18)
A1 1 '11'1	Robert Jacobson identified Paul Watson as the alternate host for Alex, essentially describing him
	,
- Alex's sidekick	as Alex's sidekick. (52:19 - 52:22)



- Unaware of Hoax	Robert Jacobson was not aware of Paul Watson's opinions about the Sandy Hook hoax
Allegations	allegations. (52:23 - 53:1)
- Objections to Sandy	Robert Jacobson independently voiced objections regarding elements of the Sandy Hook
Hook Coverage at	coverage at InfoWars and discussed these objections with others. However, he did not confirm if
InfoWars	anyone else at InfoWars also voiced similar objections. (53:2 - 53:8)
- Negative	Robert Jacobson confirmed having private conversations with his coworkers at InfoWars,
reservations about	expressing negative reservations about the Sandy Hook coverage. He specifically mentioned
Sandy Hook coverage	discussing these concerns with Ashley Beckford, Adan Salazar, Kit Daniels, and others whose
at InfoWars	names he could not remember. (53:9 - 53:20)
- Writer at InfoWars	Robert Jacobson identified Kit Daniels as a writer at InfoWars. (53:21 - 53:22)
- Uncertainty about	Robert Jacobson expressed uncertainty regarding Kit Daniels, an InfoWars writer, and his
Kit Daniels' Sandy	involvement in the Sandy Hook coverage. (53:23 - 53:25)
Hook coverage	
- Claim of Anderson	Robert Jacobson is aware of a claim regarding a supposed blue screen video interview with
Cooper Blue Screen	Anderson Cooper. (54:1 - 54:4)
Interview	
- Video Technology	Robert Jacobson stated that he was employed in the field of video technology while he was at
at InfoWars	InfoWars. (54:5 - 54:7)
	Robert Jacobson began his career in New York City, employed by several audio recording
- Audio Recording to	studios, one of which was The Hit Factory. He later relocated to Austin, Texas, initially working
Documentary	for a music studio and then joining the Austin Music Network for approximately three and a half
Production.	years, during which his experience significantly improved. Following this, Jacobson was
	employed by Alex for 13 years, producing around ten feature-length documentaries. (54:8 -
	<u>54:22)</u>
- Blue Screen	Robert Jacobson explained the process of blue screen compositing, which allows an individual to
Compositing	stand in front of a blue screen and have any desired background added behind them. (54:23 -
- Viewing Exhibit 3	55:2)  Robert Jacobson viewed a video clip that was designated as Exhibit 3 in the deposition. (55:3 -
Video Clip	55:11)
- Viewing InfoWars	Robert Jacobson consented to view a video clip from an InfoWars episode, labeled as Exhibit 3
Video Clip	in the deposition, and committed to answering questions regarding it. (55:12 - 55:18)
•	Robert Jacobson, having a broad background in video technology, indicated that the video clip
	from an InfoWars episode was not obviously a blue screen. He added that a person with
- Uncertain blue	proficient video experience might not instantly recognize it as a blue screen at first glance. Yet,
screen	he also suggested that such individuals could have significant doubts and queries about whether
	it was a blue screen, implying they might be unsure or "on the fence." Jacobson also showed an
	interest in offering more clarification on the subject. (55:19 - 56:15)
	Robert Jacobson stated that the video, Exhibit 3, did not clearly indicate a blue screen event to
	him. He disagreed with the idea that it was responsible to claim to see signs of a blue screen in
- Video Exhibit 3	the video. Jacobson explained that the error in the video could have been due to various reasons,
Error Explanation	which were not clear without knowledge of behind-the-scenes events. He suggested the
	possibility of a natural glitch often seen on YouTube, where pixels smudge, a phenomenon he
	stated is not uncommon. (56:16 - 57:21)
	Robert Jacobson explained that the only way the video from an InfoWars episode could be a
	green screen is if Anderson Cooper was not physically present with the woman in the video. He
	suggested that if Cooper's nose was cut off in the video, it could indicate that they were in
- Green Screen	different locations. If this was the case, the woman would not appear on the screen. Jacobson
Theory for InfoWars	added that if Cooper was outside the green screen bounds, the woman would also need to be
Episode	outside those bounds, implying that she would be on location while Cooper was elsewhere. He
1	also stated that if this theory was correct, the woman in the interview would not actually be
	looking at Anderson Cooper. Jacobson further noted that the interaction between the two would
	appear remarkably responsive on a super-human level, as they would not be in the same place at
	the same time. (57:22 - 60:6)



	Robert Jacobson stated that the reflection of a green screen background can sometimes be visible
	in someone's glasses during a composite shot, depending on the lighting conditions and the
- Reflection of Green	person's proximity to the screen. He confirmed that if lights are shining brightly against the
Screen in Glasses	green screen, the green color may be reflected in the glasses. However, he clarified that if a
	background is being added to the green screen, it does not show up live on the screen, but only in
	the computer. (60:7 - 61:10)
G G	Robert Jacobson stated that when a person is filmed against a green screen while wearing
- Green Screen	glasses, the projected background image, such as a town hall, that is in the computer will not
Glasses Effect	appear in the individual's glasses. (61:11 - 61:16)
	Robert Jacobson did not voice any particular objections about the Sandy Hook-related video
- Focus on Anderson	during his conversations with InfoWars staff. He found the focus on the video featuring
Cooper Video	Anderson Cooper and a woman to be nonsensical and was taken aback that Alex was
	concentrating on it, given his awareness that YouTube pixels can blur. (61:17 - 62:3)
- Sandy Hook	Robert Jacobson did not know about the complaints from parents regarding the Sandy Hook
Coverage Complaints	coverage during his tenure at InfoWars. He only learned about it later when he watched a PBS
Unknown	special on the subject. (62:4 - 62:11)
- Sandy Hook	Robert Jacobson stated that the InfoWars staff knew about the public controversy their Sandy
Controversy and Dual	Hook allegations were causing. He also said that they were aware of the public's opinion on their
Opinion	coverage of Sandy Hook, and found the existence of a dual opinion exhilarating. (62:12 - 62:25)
- Unemployed at	Robert Jacobson stated that he was not employed at InfoWars when Alex Jones was interviewed
InfoWars during	by Megyn Kelly. (63:1 - 63:4)
Kelly-Jones	
Interview	
- Harassment of	Robert Jacobson learned that parents of Sandy Hook victims were being harassed by believers in
Sandy Hook Parents	the Sandy Hook hoax conspiracy theory around 2014 or 2015. He gained this knowledge from
by Hoax Believers	viewing a PBS documentary while he was still working at InfoWars. (63:5 - 63:14)
0 1 11 1 11	Robert Jacobson became aware of the harassment parents were facing from believers in the
- Sandy Hook Hoax	Sandy Hook hoax conspiracy theory around 2014 or 2015. This led him to form opinions about
Harassment	the level of caution required in covering Sandy Hook. He confirmed that he had entered the
	writers' room several times to emphasize their ethical responsibility. (63:15 - 63:24)
	Robert Jacobson expressed his belief that InfoWars did not appropriately respond to criticisms
- InfoWars' Sandy	regarding their coverage of Sandy Hook, based on his personal knowledge of the company. He
Hook Response	was informed that his deposition was expected to last between two to two and a half hours, but
Criticized	was assured that the questioning would not take the full duration. After approximately an hour of
	questioning, a short break was taken with the intention to resume and discuss more topics. This
	break lasted from 1:12 p.m. to 1:30 p.m. (63:25 - 65:6)
- Writing Room Hub	Robert Jacobson confirmed that until the last three years of his employment, the writing room
	was the center of the writing process at InfoWars. (65:7 - 65:13)  Robert Jacobson expressed his unease regarding the process of writing for the Sandy Hook
- Unease with	coverage at InfoWars. He was specifically disturbed by the acceptance of Halbig's statements as
Halbig's Sandy Hook	truth, and the fact that the content of the article was essentially a reflection of Halbig's words.
Coverage	(65:14 - 65:21)
	(UJ.17 - UJ.21)

# Robert Jacobson, Ex-infowars Employee, Testified About His Guilt Over Sandy Hook Coverage and Potential Impact on His EEOC Complaint Payout

<b>Topic</b>	<u>Summary</u>
- Outrageous Sandy Hook Coverage	Robert Jacobson described the writing process for InfoWars' coverage of Sandy Hook as extremely outrageous, rating it a ten on a scale of one to ten. He justified his rating by expressing his disapproval of the team's refusal to correct their mistakes even after they were repeatedly pointed out. Jacobson also noted that the InfoWars team was aware of the harm they were causing to individuals outside their circle and found their laughter about the situation to be particularly outrageous. (65:22 - 66:20)



Robert Jacobson has been acquainted with Mr. Jones since his employment under him in 2004.
Robert Jacobson has known Alex Jones for 15 years and believes Jones is capable of rational actions. He used the growth of Jones' business as evidence of his rationality. Despite finding Jones' opinions tasteless, Jacobson confirmed that Jones consciously decided to run his business, even micromanaging it. Jacobson observed that Jones successfully expanded his business from a small team to its current size, leading him to conclude that Jones is more than rational in his decisions. (66:25 - 67:17)
Robert Jacobson conveyed that, due to his interactions and years of experience with Alex Jones, who hired him in 2004, he has formed an opinion on whether Alex Jones can discern right from wrong. (67:18 - 67:23)
Robert Jacobson expressed his belief that his former employer, Alex Jones, has the ability to distinguish right from wrong. This belief is not solely based on his personal opinion, but also on Jones's frequent discussions about morality on-air. Jacobson inferred that Jones's articulation of moral issues to his audience demonstrates a conscious decision-making process and an awareness of his actions. (67:24 - 68:12)
Robert Jacobson has been involved in compositing live shots onto backgrounds, as he has been requested to do so and has created such videos. (68:13 - 68:19)
Robert Jacobson primarily performed graphics work for InfoWars, in addition to his video editing duties. He did more graphics work than video compositing for the films. (68:20 - 68:25)
Robert Jacobson confirmed that green screen or blue green compositing was performed at InfoWars during his tenure there. (69:1 - 69:4)
Robert Jacobson confirmed that he is currently working in the field of video technology. Despite objections from Mr. Enoch about the term "video technology" being vague, Jacobson affirmed his understanding of the term. (69:5 - 69:15)
Robert Jacobson works in video technology, where he uses technology specifically designed for video to create a product for his clients. (69:16 - 69:20)
Robert Jacobson considers himself to possess specialized knowledge or skill in the field of video technology. (69:21 - 70:1)
Robert Jacobson possesses 17 years of expertise in video technology and more than 20 years of experience in media technology overall. He is knowledgeable about the distinction between a layman and a technical individual. (70:2 - 70:14)
Robert Jacobson identifies himself as an individual with technical expertise in the fields of video production and video technology. (70:15 - 70:21)
Robert Jacobson conveyed his view that alternative media has the potential to be beneficial, provided it follows recognized journalistic standards. He warned that deviation from these standards can lead to media becoming a cause of confusion and discord. He underscored the necessity of upholding professional standards in journalism, even in the realm of independent journalism. (70:22 - 71:15)
Robert Jacobson expressed uncertainty and chose not to comment on the issue of whether professionalism in journalism was upheld or violated in relation to the Sandy Hook incident. (71:16 - 72:1)
Robert Jacobson expressed guilt over the Sandy Hook coverage that was aired on InfoWars, his former place of employment. He questioned whether he should have acted more quickly, either by resigning or catching the story sooner, or if he should have been more effective in explaining the situation. (72:2 - 72:12)
Robert Jacobson confirmed that he is no longer on friendly terms with his former employer, InfoWars, and that he was terminated from the company. (72:13 - 72:17)
Robert Jacobson lodged a complaint with the Equal Employment Opportunity Commission. (72:18 - 72:19)
Robert Jacobson confirmed filing a complaint with the Equal Opportunity Employment Commission due to Alex Jones' abusive behavior, the unethical and racist behavior of his staff,



anti-Semitism and	and the generally racist and abusive environment at InfoWars. He provided evidence of being
abuse.	Photoshopped onto a Rabbi's face and circulated around the office, and of Owen Schroeder and
	Rob Dew referring to him as the resident Jew on air. Jacobson stated that InfoWars had a culture
	of anti-Semitism and abuse, primarily propagated by Alex Jones. He was aware of several other
	people who have lodged similar complaints against Alex Jones and InfoWars. (72:20 - 73:23)
	Robert Jacobson acknowledged the potential perception of bias due to his EEOC complaint
	against Alex Jones and InfoWars. He argued that his personal dispute with Jones does not
- Perceived Bias and	invalidate his claims or Jones' actions towards the Sandy Hook parents. Jacobson emphasized the
Well-Documented	reality of both his experiences and the Sandy Hook incident, stating they are independent truths.
Abuse	He highlighted Jones' abusive behavior as well-documented and public knowledge. Despite
	admitting that his complaint might lead to perceived bias, Jacobson insisted on the truthfulness
	of his statements. (73:24 - 75:9)
- Victims' Parents	Robert Jacobson would not benefit in any way if the parents of the Sandy Hook shooting
Suing Alex	victims, who have filed lawsuits against Alex Jones and InfoWars, were to receive money from
Jones/InfoWars	Alex Jones. (75:10 - 75:13)
	Robert Jacobson expressed concern that if the parents of Sandy Hook, who have filed lawsuits,
- EEOC ruling impact	receive a substantial monetary award from Alex Jones, it could negatively impact him. He
on compensation	further explained that a ruling in his favor by the Equal Opportunity Employment Commission
	(EEOC) could potentially jeopardize his future compensation. (75:14 - 75:20)

# Jacobson Testifies His Actions Against Jones Are Due to Harmful Influence, Not Compensation, and Criticizes Enoch's Disruptive Conduct

<b>Topic</b>	<u>Summary</u>
- Jacobson's Disapproval of Jones' Actions	Robert Jacobson is not seeking compensation from the lawsuit. He disapproves of Alex Jones' actions, which he believes have caused harm to the Sandy Hook parents and himself. Jacobson criticized Jones for broadcasting potentially misleading information that incites his audience and for promoting his content as news, despite its uncertain truthfulness. He confirmed that his deposition responses were based on his personal experiences. After answering questions from Mr. Bankston, Jacobson temporarily left the room. During his absence, Mr. Bankston accused Mr. Enoch of attempting to hijack the deposition and make Jacobson uncomfortable with unexpected questions. He also noted Mr. Enoch's frequent interjections during the first deposition of Mr. Jones. Upon returning, Jacobson stated he was asked about the identity of a building and whether it was a school. He expressed dissatisfaction with the deposition, describing it as "ridiculous and improper", and felt he was being "tag-teamed". He confirmed that he reviewed the transcript to verify these incidents. (75:21 - 85:10)