

Robert Jacobson Deposition Summary

Scarlett Lewis vs. Alex E. Jones, Infowars, LLC, And Free Speech Systems, LLC in the 53rd Judicial District, Travis County, Texas.

DEPOSITION ABSTRACT

Robert Jacobson, a former employee of InfoWars, provided a detailed deposition regarding his time at the company and its coverage of the Sandy Hook incident. Jacobson, who worked at InfoWars for approximately 13 years until 2017, discussed the internal dynamics, journalistic practices, and the evolution of the company from a small operation to a larger media entity with over 60 staff members. He highlighted a shift in journalistic standards over time, particularly criticizing the handling of the Sandy Hook story and the reliance on questionable sources like Wolfgang Halbig. Jacobson expressed his discomfort with the unethical journalistic practices and the spread of conspiracy theories, including the portrayal of Sandy Hook victims as "crisis actors."

Jacobson also addressed his understanding of confidentiality and non-disclosure agreements, clarifying that he believed exposing abusive behavior within InfoWars did not violate these agreements. He recounted his attempts to raise concerns about the Sandy Hook coverage internally, which were met with dismissal or mockery. Jacobson's testimony touched on the technical aspects of video production, disputing claims made by InfoWars about the use of green screens in news coverage.

Furthermore, Jacobson discussed his personal fallout with InfoWars, including filing a complaint with the Equal Employment Opportunity Commission (EEOC) against Alex Jones and InfoWars for abusive behavior and creating a hostile work environment. He emphasized that his grievances and the reality of Jones' behavior towards him and the Sandy Hook parents could coexist, asserting that his bias does not invalidate his claims. Jacobson clarified that he is not seeking compensation from Jones but is involved in the case due to Jones' behavior towards the Sandy Hook parents and himself.

KEY ADMISSIONS

Dispute Over Witness Subpoena and Confidentiality Agreements

- Mr. Enoch questioned Robert Jacobson about a subpoena despite objections from Mr. Bankston regarding Jacobson's non-disclosure and confidentiality agreements. (Robert Jacobson Depo. [4:16 - 21:18](#))

Lack of Early Confidentiality Agreement at InfoWars

- Robert Jacobson was not given a confidentiality agreement during his first six years at InfoWars and was later presented with it as an ultimatum that threatened his livelihood. (Robert Jacobson Depo. [22:22 - 23:5](#))

Exposing Abusive Behavior, Respecting Confidentiality

- Robert Jacobson believes that exposing abusive behavior within InfoWars does not violate the non-disclosure agreement as it does not involve revealing company secrets, but rather the behavior of Mr. Jones and his staff. (Robert Jacobson Depo. [23:17 - 24:16](#))

Robert Jacobson's Initial Aspirations at InfoWars

- Robert Jacobson joined InfoWars with the intention of working on stories related to the occult, esoteric politics, and undisclosed activities of politicians, believing it to be a fringe but honest media outlet. (Robert Jacobson Depo. [25:13 - 25:23](#))
- Robert Jacobson joined InfoWars with the goal of becoming a documentary filmmaker, which he believes is a form of journalism. (Robert Jacobson Depo. [25:24 - 26:7](#))

Robert Jacobson on Importance of Multiple Perspectives in Journalism and His Early Years at InfoWars

- Robert Jacobson emphasizes the importance of good journalism and corroboration of facts by highlighting how multiple witnesses and perspectives provide a more accurate and comprehensive description of events, likening it to observing a cup from different sides. (Robert Jacobson Depo. [27:5 - 27:17](#))
- Robert Jacobson found the films he produced and assisted in producing at InfoWars interesting and believed that Alex presented enough expert testimony to make them credible. (Robert Jacobson Depo. [28:9 - 28:16](#))

Jacobson's Concerns Over InfoWars' Sandy Hook Coverage Ethics

- Robert Jacobson expressed concerns about InfoWars' coverage of the Sandy Hook incident, citing a lack of journalistic ethics and potential damage, but his attempts to communicate his concerns were met with laughter and jokes. (Robert Jacobson Depo. [33:6 - 35:22](#))
- Robert Jacobson criticized Adan Salazar's journalistic ethics at InfoWars regarding the Sandy Hook topic, expressing concerns about Salazar's heavy reliance on one witness, Wolfgang Halbig, and speculative facts without proper investigation, leading to irresponsible accusations and potential harm. (Robert Jacobson Depo. [36:20 - 41:5](#))
- Robert Jacobson criticizes Dan Bidondi's emotional and biased approach to journalism, citing his work at InfoWars and unprofessional behavior during the Boston bombing coverage. (Robert Jacobson Depo. [44:14 - 46:13](#))
- Robert Jacobson was disturbed by the way emotional changes of Sandy Hook parents were interpreted on the InfoWars set and expressed disgust at the lack of understanding for this emotional range. (Robert Jacobson Depo. [49:14 - 51:2](#))

Jacobson's Understanding of 'Crisis Actors'

- Robert Jacobson claimed that he learned about "crisis actors" at InfoWars, and believed they were individuals funded by special interests to stage fake events in order to influence policy changes. (Robert Jacobson Depo. [51:3 - 51:15](#))

Jacobson's Disbelief in 'Crisis Actors' Claims at Sandy Hook

- Robert Jacobson heard the term "crisis actors" in relation to Sandy Hook while working at InfoWars but did not believe there was enough evidence to make such an allegation on air. (Robert Jacobson Depo. [51:16 - 52:1](#))
- Robert Jacobson criticized the unfounded allegations of "crisis actors" being used at Sandy Hook and stressed the importance of having sufficient evidence before making serious claims. (Robert Jacobson Depo. [52:2 - 52:18](#))

Robert Jacobson's Testimony on InfoWars' Green Screen Usage, Sandy Hook Coverage, and Anti-Semitic Workplace Culture

- Robert Jacobson suggests that if Anderson Cooper's nose was cut off in an InfoWars video, it would imply that he and the woman in the video were in different locations, making their interaction on a super-human level and not actually looking at each other. (Robert Jacobson Depo. [57:22 - 60:6](#))
- Robert Jacobson claims that the InfoWars staff was aware of the controversy and public opinion surrounding their Sandy Hook coverage and experienced a rush from the dual opinion. (Robert Jacobson Depo. [62:12 - 62:25](#))
- Robert Jacobson is an experienced video technology specialist who distinguishes between laymen and technical experts in the field. (Robert Jacobson Depo. [69:5 - 70:14](#))

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- Robert Jacobson expressed regret and guilt for not taking action sooner or being more proactive in addressing the Sandy Hook coverage at InfoWars. (Robert Jacobson Depo. [72:2 - 72:12](#))
- Robert Jacobson filed a complaint with the EEOC against InfoWars for a culture of anti-Semitism and abuse, including evidence of himself being Photoshopped onto a Rabbi's face and called the resident Jew on air. (Robert Jacobson Depo. [72:20 - 73:23](#))

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EXAMINATION

Robert Jacobson Introduces Himself During a Deposition

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

Dispute Over the Right to Question Witness Jacobson Due to Lack of Subpoena and Confidentiality Concerns Halts Deposition

<u>Topic</u>	<u>Summary</u>
Subpoena Dispute	Robert Jacobson was asked by Mr. Enoch if he had been served with a subpoena. Mr. Bankston interrupted, stating that Mr. Enoch had no authority to question the witness. Mr. Enoch argued that Jacobson was under a non-disclosure agreement (NDA) and a confidentiality agreement, and without a subpoena, he could not testify. Mr. Bankston countered that he had served a Notice of Deposition on Jacobson and that Mr. Enoch had already informed Jacobson of his obligations under the confidentiality agreements. Mr. Enoch insisted on questioning Jacobson about his receipt of a subpoena. <u>(4:16 - 21:18)</u>

Robert Jacobson Testified About His Employment at Infowars from 2004 to 2017, Initially Hired by Alex Jones for Free Speech Systems, LLC

<u>Topic</u>	<u>Summary</u>
Self-Introduction Confirmed	Robert Jacobson confirmed that he introduced himself for the record. (21:19 - 21:25)
Former Infowars Employee	Robert Jacobson confirmed that he used to work at InfoWars. (22:1 - 22:2)
Hired As Independent Proprietor	Robert Jacobson was hired by Alex Jones in 2004. He believed he was hired by Alex Jones as an independent proprietor. (22:3 - 22:9)
Former Employer Confirmation	Robert Jacobson confirmed that his former employer claims he worked for Free Speech Systems, LLC. (22:10 - 22:14)
Employment Ended In 2017	Robert Jacobson's employment ended on May 1st, 2017. He worked at InfoWars for approximately 13 years. (22:15 - 22:21)

Robert Jacobson Testified About Infowars' Unethical Journalism Practices, Especially Regarding Sandy Hook, and His Attempts to Address These Issues Internally

<u>Topic</u>	<u>Summary</u>
Confidentiality Ultimatum	Robert Jacobson did not have a confidentiality agreement during his first six years of employment at Free Speech Systems, LLC, also known as InfoWars. Around 2010, the concept of confidentiality was introduced in the office but was not presented to Jacobson until years later. When it was, it was presented as an ultimatum that threatened his livelihood. (22:22 - 23:5)
Exhibit 2 Shown After Exhibit 1 Taken	Robert Jacobson was shown an item marked as Exhibit 2 after Exhibit 1 was taken by Mr. Enoch. Mr. Enoch objected and moved to strike. (23:6 - 23:12)
Exhibit 2 Recognition	Robert Jacobson confirmed that he has seen Exhibit 2 before. (23:13 - 23:16)
Confidentiality And Misbehavior	Robert Jacobson understands his obligations under the confidentiality non-disclosure agreements and has abided by them. He interprets the non-disclosure agreement as not covering abusive behavior or misbehavior within the company, which he doesn't consider company secrets. He is present to expose abusive behavior within InfoWars and doesn't believe this violates the non-disclosure agreement. He assures that no company secrets, such as their news production formulas, will be revealed. Instead, he will disclose the behavior of Mr. Jones and his staff. (23:17 - 24:16)
Deposition Order Uncertainty	Robert Jacobson is uncertain about a Travis County judge issuing an order concerning his deposition. (24:17 - 24:22)
Court Order Seen	Robert Jacobson recalls seeing a court order concerning his deposition. (24:23 - 24:25)
Deposition Without Court Order	Robert Jacobson was unsure about his comfort level appearing for deposition without a court order, but felt it was the right thing to do regardless. (25:1 - 25:9)
Infowars Belief	Robert Jacobson mostly believed in InfoWars' mission when he first joined the company. (25:10 - 25:12)
Infowars Misconception	Robert Jacobson initially wanted to work on stories related to the occult, esoteric politics, and undisclosed activities of politicians when he joined InfoWars. He was under the impression that InfoWars was a fringe media outlet that, while off the mainstream, was still honest. (25:13 - 25:23)

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Filmmaking Passion Discovery	Robert Jacobson was passionate about filmmaking and wanted to be a documentary filmmaker when he first joined InfoWars. He believes that this falls under a broader umbrella of journalism, specifically documentary films. (25:24 - 26:7)
Journalistic Intent Confirmed	Robert Jacobson confirmed his intention to do good journalism when he first joined InfoWars. (26:8 - 26:21)
Objective Journalism Definition	Robert Jacobson defined good journalism as the objective reporting of facts, where the journalist removes their emotions and theories as much as possible. He emphasized the importance of reporting empirical evidence to the public with minimal bias. (26:22 - 27:4)
Importance Of Multiple Viewpoints	Robert Jacobson believes that good journalism and corroboration of facts are closely related. He asserts that the more witnesses and perspectives on a reported action or activity, the better. He uses the analogy of observing a cup from different sides to illustrate the importance of multiple viewpoints in providing a comprehensive description of an event. He emphasizes that the more witnesses involved, the more accurate the post-event impressions of what transpired. (27:5 - 27:17)
Journalism Style Comfort	Robert Jacobson was asked about his comfort level with the style of journalism and the stories he worked on during his initial years at InfoWars. An objection was raised regarding the form and leading nature of the question, but Jacobson was advised he could still answer. He requested for the question to be repeated. (27:18 - 28:8)
Infowars Films Were Credible	Robert Jacobson was comfortable with the films he was producing and assisting Alex in producing during his early years at InfoWars. He found the films interesting and believed that Alex presented sufficient expert testimony to make them credible. (28:9 - 28:16)
Sandy Hook Lawsuit Connection	Robert Jacobson understands that the lawsuit being discussed in the deposition is related to Sandy Hook. (28:17 - 28:19)
Company Change Confirmed	Robert Jacobson confirmed that the company had changed by the start of 2013. He agreed to pause before answering questions to avoid disruption from objections during the deposition. (28:20 - 29:17)
Talking Over Each Other	Robert Jacobson acknowledges the difficulty that talking over each other can cause for the court reporter. (29:18 - 29:23)
Infowars Transformation: 2005-2013	Robert Jacobson confirmed that InfoWars, his former employer, had changed significantly from the start of his employment to 2013. Initially, the operation was small with possibly five or less employees, and he worked out of his private office. Alex, presumably the owner, had a small office in south Austin and one known employee, Ryan Schlickeisen. There was also a woman who managed a warehouse in south Austin, but Jacobson was unsure of her name and where Alex was broadcasting from. By 2010, InfoWars had grown into a full-size facility with over 60 staff members and a full-blown studio, marking a dramatic difference in every aspect. (29:24 - 31:1)
Infowars' Journalism Shift	Robert Jacobson felt that InfoWars' approach to journalism had changed, with Alex Jones shifting from a combination of website, films, and radio show to focusing more on the radio show and website, eliminating the film component. Jacobson believed this was a significant loss. He also noticed a change in the process of fact-checking, with Jones relying more on others for research towards the end of Jacobson's employment, and he questioned the qualifications of these individuals. Jacobson contacted Mr. Bankston about the case because he felt complicit in the events that transpired at InfoWars, despite not being directly involved in the dissemination of information about Sandy Hook. (31:2 - 33:5)
Sandy Hook Coverage Concerns	Robert Jacobson, during his employment at InfoWars, was occasionally exposed to the company's coverage of the Sandy Hook incident. He was bothered by the accusations made by

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	<p>the company based on limited information, which he perceived as a lack of journalistic ethics. Jacobson attempted to communicate his concerns to the writers, emphasizing the importance of journalistic ethics and the potential damage of their actions. His attempts were often met with laughter and jokes. He identified two writers who were primarily involved in the Sandy Hook coverage. Jacobson confirmed that he was aware of every staff member at InfoWars until May 2017 and considered some of the Sandy Hook coverage to be reckless.</p> <p>(33:6 - 35:22)</p>
Infowars Reckless Conduct	<p>Robert Jacobson believes that certain individual employees at InfoWars, where he worked until May 2017, engaged in reckless conduct regarding the Sandy Hook story coverage.</p> <p>(35:23 - 36:4)</p>
Opinions On Infowars Employee	<p>Robert Jacobson developed opinions about the work of Rob Dew, an employee at InfoWars, on Sandy Hook.</p> <p>(36:5 - 36:8)</p>
Sandy Hook Conspiracy Enthusiasm	<p>Robert Jacobson believes that Rob Dew was overly eager to accept any suggestion that the Sandy Hook incident might have been a staged act. He observed that Dew would celebrate any hint or whisper of this possibility.</p> <p>(36:9 - 36:17)</p>
Knows Infowars Employee	<p>Robert Jacobson knows Adan Salazar, an employee at InfoWars.</p> <p>(36:18 - 36:19)</p>
Ethical Concerns At Infowars	<p>Robert Jacobson observed Adan Salazar working on the Sandy Hook topic at InfoWars. He expressed his opinion that Salazar was violating journalistic ethics by relying heavily on the word of one witness, Wolfgang Halbig, and a few speculative facts, without conducting proper investigation or corroboration. Jacobson pointed out to Salazar that Halbig could have issues they were not considering and that his accusations were irresponsible and damaging. Despite Jacobson's concerns, Salazar responded with mockery, expressing a desire to print T-shirts and bumper stickers saying "Halbig was right."</p> <p>Jacobson described Halbig as a frequent contributor whenever Sandy Hook was covered on InfoWars. He expressed concerns about Halbig's mental and emotional state, suggesting he could be a lonely man seeking attention. Jacobson criticized the decision to present Halbig's heavy accusations against the parents of Sandy Hook victims without questioning his credibility or considering the ethical implications. He felt that the story should not have been presented to the public without proper journalistic ethics, which he believed were lacking at InfoWars.</p> <p>Jacobson was unsure who Halbig's points of contact at InfoWars were, suggesting it might be those handling the Sandy Hook story. He was familiar with some of the claims made by Halbig.</p> <p>(36:20 - 41:5)</p>
Irresponsible Claim Handling	<p>Robert Jacobson confirmed hearing the claim that Sandy Hook school was closed before the shooting, a claim often associated with Mr. Wolfgang Halbig. He agreed that he observed irresponsible behavior regarding this claim during his time at InfoWars. He identified Mr. Robert Dew and Mr. Adan Salazar as those acting irresponsibly with respect to the claim.</p> <p>(41:6 - 41:24)</p>
No Paramedics Allowed	<p>Robert Jacobson heard the claim that no paramedics were allowed inside the Sandy Hook building, but only as an audience member watching a video. He had no direct exposure to the event.</p> <p>(41:25 - 42:7)</p>
Sandy Hook Photo Allegation	<p>Robert Jacobson has heard the allegation that there are photographs of supposedly dead children from the Sandy Hook incident who are actually alive.</p> <p>(42:8 - 42:11)</p>
Photograph Allegation Dismissed	<p>Robert Jacobson finds the allegation about photographs of supposedly dead children who are actually alive distasteful. He believes that this, along with other allegations set forward by Halbig and others, are individual cross-sections of information that were improperly handled.</p> <p>(42:12 - 42:23)</p>

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Infowars Criticism Voiced	Robert Jacobson voiced criticism of Mr. Halbig to Adan Salazar while at InfoWars. (42:24 - 43:4)
No Halbig Communications	Robert Jacobson is familiar with Leonard Pozner, a Sandy Hook parent. However, he has not seen any written communications or emails from Mr. Halbig. (43:5 - 43:11)
Infowars And Halbig: Unclear Connection	Robert Jacobson does not know if Mr. Halbig ever visited the InfoWars location in Austin, or if anyone from InfoWars visited Mr. Halbig in Florida. He is also unaware of InfoWars helping to raise money for Mr. Halbig. (43:12 - 43:21)
Halbig Not Harassing	Robert Jacobson has never heard of Mr. Halbig engaging in harassing behavior towards people involved in Sandy Hook. (43:22 - 44:1)
Dan Bidondi Recognition	Robert Jacobson knows who Dan Bidondi is. (44:2 - 44:3)
Mr. Bidondi'S Infowars Role	Robert Jacobson stated that Mr. Bidondi served as an on-air reporter and journalist for InfoWars for approximately a year. (44:4 - 44:8)
Bidondi Meeting Confirmed	Robert Jacobson is unsure if Dan Bidondi, a former InfoWars reporter, ever covered the Sandy Hook event in Newtown. However, he confirms that he has met Bidondi. (44:9 - 44:13)
Unsuitable Journalist Character	Robert Jacobson would not choose Dan Bidondi to treat the Sandy Hook story with respect and sensitivity due to Bidondi's emotional and belief-based approach. Jacobson views Bidondi as more of a character than a journalist, prone to bias and over-emotion, particularly in conspiracy scenarios. Jacobson cites Bidondi's work at InfoWars, which often involved the occult and conspiracy theories. He mentions Bidondi's unprofessional behavior during the Boston bombing coverage, where he made an accusation instead of asking a question, leading to his removal from the building. This incident, however, made Bidondi a celebrity at InfoWars. (44:14 - 46:13)
Public Agitation Vs. Reporting	Robert Jacobson stated that public agitation, such as making accusations at public events, was beneficial for an employee's career at InfoWars. He cited several instances where staff members engaged in such behavior, which he criticized as being more akin to public disruption than reporting. Jacobson provided an example of this, mentioning an incident involving Ms. Millie Weaver, an InfoWars staff member. According to Jacobson, Weaver attended a Hillary Clinton book signing event wearing Trump gear and asked abrasive questions about Clinton. He argued that this behavior was not journalism but agitation, and was indicative of InfoWars' practice of conflating the two. (46:14 - 48:6)
Infowars Interview Emotions	Robert Jacobson has never been involved in planning to elicit negative emotional reactions during interviews at InfoWars. He hasn't worked closely with Millie Weaver or Owen Schroeder, but believes Schroeder, who often attends political events wearing Trump hats, should understand the difference between a journalist and an agitator. Jacobson has never participated in discussions about causing fights, but believes that wearing politically charged gear to events, as Schroeder does, is obviously intended to affect people's emotions. (48:7 - 49:8)
Infowars Sandy Hook Comments	Robert Jacobson heard no one at InfoWars express negative feelings about the Sandy Hook parents, except for Alex's live on-air comments. (49:9 - 49:13)
Sandy Hook Comments Discomfort	Robert Jacobson was uncomfortable with Alex Jones' comments on air about the Sandy Hook parents. He was disturbed by the way Mr. Pozner's emotional changes were interpreted on the InfoWars set, particularly the shift from laughter to seriousness. Jacobson attempted to clarify to others, including Mr. Salazar, that emotional fluctuations are common after a traumatic event and that a brief moment of laughter does not negate the impact of a tragedy. He expressed

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	disgust at the lack of understanding for this emotional range. (49:14 - 51:2)
Crisis Actors" Theory	Robert Jacobson stated that he had heard the term "crisis actors" during his time at InfoWars. He understood the term to refer to individuals, possibly from Special Forces or a similar group, who are part of a nefarious organization either within or outside the government. These individuals, according to Jacobson, are funded by special interest money to stage fake events, such as faking their own deaths, with the aim of influencing policy changes. (51:3 - 51:15)
Crisis Actors Mentioned	Robert Jacobson confirmed hearing the term "crisis actors" in relation to the Sandy Hook event while working at InfoWars. However, he stated that he did not believe he would ever see evidence sufficient to responsibly make such an allegation on air. (51:16 - 52:1)

Robert Jacobson Discussed His Shock at the Lack of Research Into Sandy Hook "crisis Actor" Claims and His Ethical Concerns with Infowars' Coverage

<u>Topic</u>	<u>Summary</u>
Crisis Actor Allegations	Robert Jacobson found it shocking that allegations of "crisis actors" being used at Sandy Hook were made without thorough research. He emphasized that such serious claims should only be made if there is sufficient evidence, akin to what would be required to prove a case in court. (52:2 - 52:18)
Alex'S Sidekick: Paul Watson	Robert Jacobson identifies Paul Watson as Alex's alternate host and describes him as Alex's sidekick. (52:19 - 52:22)
Paul Watson'S Opinions Unknown	Robert Jacobson is not aware of Paul Watson's opinions about the Sandy Hook hoax allegations. (52:23 - 53:1)
Infowars Sandy Hook Objections	Robert Jacobson independently voiced objections about the Sandy Hook coverage at InfoWars and discussed it with others. (53:2 - 53:8)
Private Conversations At Infowars	Robert Jacobson confirmed having private conversations with his coworkers at InfoWars about concerns regarding the Sandy Hook coverage. He specifically mentioned speaking with Ashley Beckford, Adan Salazar, Kit Daniels, and others he couldn't recall. (53:9 - 53:20)
Kit Daniels - Infowars Writer	Robert Jacobson identified Kit Daniels as a writer at InfoWars. (53:21 - 53:22)
Infowars Writer'S Involvement Uncertain	Robert Jacobson is unsure if Kit Daniels, a writer at InfoWars, was ever involved in the Sandy Hook coverage. (53:23 - 53:25)
Blue Screen Allegation	Robert Jacobson is familiar with an allegation concerning a supposed blue screen video interview with Anderson Cooper. (54:1 - 54:4)
Infowars Video Tech	Robert Jacobson worked in video technology while at InfoWars. (54:5 - 54:7)
Audio And Film Production Experience	Robert Jacobson started his career in New York City, working for several audio recording studios, including The Hit Factory. He then moved to Austin, Texas, where he worked for a music studio and the Austin Music Network for about three and a half years. After that, he worked for Alex for 13 years, producing approximately ten feature-length documentaries. (54:8 - 54:22)
Blue Screen Compositing	Robert Jacobson explained that blue screen compositing allows a person to stand in front of a blue screen and add any desired background behind them. (54:23 - 55:2)
Exhibit 3 Shown	Robert Jacobson was shown a video clip, marked as Exhibit 3, during his deposition. (55:3 - 55:11)

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Exhibit 3 Viewing	Robert Jacobson agreed to watch a video clip from an InfoWars episode, which was presented as Exhibit 3 in the deposition. (55:12 - 55:18)
Video Expert Doubts Blue Screen	Robert Jacobson, with his extensive experience in video technology, stated that the video clip from an InfoWars episode was not clearly a blue screen. He also mentioned that anyone with competent video experience would not immediately identify it as a blue screen. However, he felt that such individuals might have serious doubts and questions about whether it was a blue screen. He expressed a desire to further explain his perspective. (55:19 - 56:15)
Video Error Cause Unclear	Robert Jacobson stated that there is nothing in the video clip from an InfoWars episode that clearly indicates to him that it was a blue screen event. He disagreed with the assertion that anyone claiming to see telltale signs of blue screen in the video is acting responsibly. Jacobson suggested that the error in the video could have been caused by a number of different reasons, including a natural glitch that often occurs on YouTube where pixels smudge. He emphasized that without knowing what happened behind the scenes, it's not clear what caused the error. (56:16 - 57:21)
Green Screen Analysis	Robert Jacobson stated that the only way the video from an InfoWars episode could be using green screen is if Anderson Cooper was not standing next to the woman in the video. He clarified that he was not making an opinion, but if Cooper's nose was cut off, it would suggest that he stepped out of the green screen bounds, implying that he and the woman were in different locations. Jacobson further explained that if this was the case, the woman would not be visible on the screen. He also stated that if the setup he described was true, the woman in the interview would not be actually looking at Anderson Cooper. According to Jacobson, the interaction between the two would be remarkably responsive on a super-human level as they would not be in the same place at the same time. (57:22 - 60:6)
Green Screen Reflections	Robert Jacobson stated that the green screen background being composited in a scenario where two individuals are in different locations might sometimes show up in the reflection of their glasses. This depends on the lighting conditions and the proximity of the individuals to the screen. If the lights are bright and directed at the green screen, the green screen would be visible. However, if a background is being added to the green screen, it only appears in the computer and not live on the green screen itself. (60:7 - 61:10)
Green Screen Glasses Effect	Robert Jacobson stated that if a person is filmed against a green screen while wearing glasses, the projected image added in post-production will not appear in their glasses. (61:11 - 61:16)
Green Screen Video Allegation	Robert Jacobson did not specifically raise complaints about the video allegation that Anderson Cooper used a green screen during the Sandy Hook interview. He considered this point as silly and was surprised that Alex was emphasizing it, knowing that YouTube pixels can smudge. (61:17 - 62:3)
Infowars Complaint Awareness	Robert Jacobson was not immediately aware of parents' complaints about InfoWars' coverage of Sandy Hook during his time there past 2013. He became aware of the complaints sometime later when he saw a PBS special on the subject. (62:4 - 62:11)
Infowars' Sandy Hook Awareness	Robert Jacobson believes that the InfoWars staff, which he was a part of past 2013, was aware of the public controversy they were causing with their Sandy Hook allegations. He also believes that they were aware of the public opinion about their Sandy Hook coverage, and that they experienced a rush from the dual opinion. (62:12 - 62:25)
Infowars Employment Status	Robert Jacobson was not employed at InfoWars when Alex Jones was interviewed by Megyn Kelly. (63:1 - 63:4)

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Sandy Hook Harassment Awareness	Robert Jacobson became aware that parents of Sandy Hook victims were being harassed by believers in the Sandy Hook hoax conspiracy theory around 2014 or 2015, after watching a PBS documentary. At the time, he was employed at InfoWars. (63:5 - 63:14)
Harassment Affects Coverage	Robert Jacobson confirmed that the harassment he became aware of led him to form opinions about the level of caution required in covering Sandy Hook. He stated that he had repeatedly tried to emphasize to the writers their ethical responsibility. (63:15 - 63:24)
Infowars Unresponsive, Harassment	Robert Jacobson stated that he does not believe InfoWars was responsive to criticisms about their Sandy Hook coverage and the harassment of parents by believers in the Sandy Hook hoax conspiracy theory. He also acknowledged that his deposition was scheduled for two to two and a half hours, and agreed to a 15-minute break after an hour of questioning. (63:25 - 65:6)
Infowars Writing Room Central	Robert Jacobson confirmed that the writing room at InfoWars was the center of the writing process until the last three years he worked there. (65:7 - 65:13)
Infowars Writing Process Concerns	Robert Jacobson was concerned about the writing process for the coverage of Sandy Hook at InfoWars because they accepted Halbig's word as fact and used it as the basis for their articles. (65:14 - 65:21)
Infowars' Sandy Hook Coverage	Robert Jacobson rated the conduct of people at InfoWars in their coverage of Sandy Hook as extremely outrageous (a ten on a scale of one to ten). He believed it was outrageous because despite being repeatedly informed that they were making a mistake, they not only ignored the corrections but also laughed about the damage they were causing to people outside of their zone. (65:22 - 66:20)
Jones' Former Employee	Robert Jacobson has known Mr. Jones since he was employed by him in 2004. (66:21 - 66:24)
Jones' Rationality Evidence	Robert Jacobson believes that Alex Jones, who employed him in 2004, is capable of rational actions. He cites the growth of Jones' business as evidence of his rationality, stating that Jones made conscious decisions to run the business, micromanaged it, and successfully expanded it from a small operation to its current size. (66:25 - 67:17)
Jones' Moral Comprehension	Robert Jacobson confirmed that he has an opinion on whether Alex Jones, who employed him in 2004, can understand right from wrong. (67:18 - 67:23)

Jacobson Believes Mr. Jones Understands Right from Wrong, Evidenced by His Public Discussions on Morality

<u>Topic</u>	<u>Summary</u>
Jones' Moral Awareness	Robert Jacobson believes that Mr. Jones can distinguish right from wrong. He supports this by stating that Mr. Jones frequently discusses morality on air, demonstrating his understanding and conscious decision-making. Jacobson asserts that Mr. Jones' ability to articulate these concepts indicates his awareness and thoughtfulness about them. (67:24 - 68:12)

Robert Jacobson, with Extensive Experience in Video Technology and Graphics, Expresses Guilt Over Infowars' Sandy Hook Coverage and Has Filed an EEOC Complaint Against the Company

<u>Topic</u>	<u>Summary</u>
Compositing Experience Confirmed	Robert Jacobson has experience in compositing live shots onto backgrounds, having been asked to do it and having produced such videos. (68:13 - 68:19)
Graphics Work Focus	Robert Jacobson primarily performed graphics work for InfoWars, in addition to video editing. He did more graphics than video compositing for the films. (68:20 - 68:25)

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Green Screen Compositing Confirmed	Robert Jacobson confirmed that during his employment at InfoWars, the studio performed green screen or blue green compositing at the facility. (69:1 - 69:4)
Video Technology Specialist	Robert Jacobson confirms that he works in video technology, which he defines as using technology designed to work on video as tools to create a product for his clients. He considers himself to have specialized knowledge or skill in this technical field. Jacobson has 17 years of experience in video technology and over 20 years in media technology in general. He understands the difference between a layman and a technical person. (69:5 - 70:14)
Video Production Expert	Robert Jacobson considers himself as someone who has technical expertise in video production and video technology. (70:15 - 70:21)
Media'S Impact On Society	Robert Jacobson believes that media, including alternative media, can be a force for good if it adheres to established journalistic standards. However, if these standards are not followed, he thinks it can lead to confusion and harm. He asserts that there should always be a professional standard of journalism, and independent journalism should respect this. (70:22 - 71:15)
Journalism Professionalism Uncertain	Robert Jacobson does not have a comment on whether professionalism in journalism went right or wrong regarding Sandy Hook, stating he is not sure. (71:16 - 72:1)
Infowars Guilt	Robert Jacobson expressed guilt about the Sandy Hook coverage that came out of InfoWars, where he worked. He felt he should have acted faster, possibly quit, caught the story faster, or been better at explaining. (72:2 - 72:12)
Infowars Termination	Robert Jacobson is no longer on friendly terms with InfoWars, the media organization he previously worked for. He was terminated from his position there. (72:13 - 72:17)
Eeoc Complaint Filed	Robert Jacobson filed a complaint with the Equal Employment Opportunity Commission. (72:18 - 72:19)
Infowars' Racist Environment	Robert Jacobson filed a complaint with the Equal Opportunity Employment Commission (EEOC) due to Alex's abusive behavior, the unethical and racist behavior of his staff, and the generally racist and abusive environment at InfoWars. He submitted evidence to the EEOC of himself being Photoshopped onto a Rabbi's face and passed around the office, and of Owen Schroeder and Rob Dew calling him the resident Jew on air. He stated that there was a culture of anti-Semitism and abuse at InfoWars, propagated mostly by Alex Jones. Jacobson also mentioned that he knows of several people who have filed similar complaints against Alex Jones and InfoWars. (72:20 - 73:23)
Perceived Bias Acknowledged	Robert Jacobson acknowledges that people might perceive him as biased due to his EEOC claim against Alex Jones and InfoWars. He argues that his complaint and the reality of Jones' abusive behavior towards him and others, as well as Jones' actions towards the Sandy Hook parents, can both be true simultaneously. Jacobson asserts that his bias does not invalidate his claims, and that Jones' abusive behavior is well-documented and public knowledge. He insists that everything he is saying is true, despite potential perceptions of bias. (73:24 - 75:9)
Sandy Hook Lawsuit Benefit	Robert Jacobson stated that he would not benefit in any way if the Sandy Hook parents, who are suing Alex Jones, were awarded money from Alex Jones. (75:10 - 75:13)
Compensation At Risk	Robert Jacobson stated that if the Sandy Hook parents are awarded a significant amount of money from Alex Jones, it could potentially jeopardize his own compensation if the EEOC rules in his favor. (75:14 - 75:20)

Jacobson Testifies Against Alex Jones for Harmful Actions, Not Seeking Compensation; Legal Objections and Procedural Disputes Follow

<u>Topic</u>	<u>Summary</u>
Jones' Disgraceful Behavior	Robert Jacobson stated that he is not seeking compensation from Alex Jones, but is involved in the case due to Jones' disgraceful behavior towards the Sandy Hook parents and himself. Jacobson criticized Jones for his potentially misleading broadcasts, which he believes mobilize a large audience in irrational thinking. Jacobson confirmed that all his answers were based on his personal knowledge. After his testimony, there was a discussion between the lawyers about the deposition process and whether Jacobson would be questioned further. (75:21 - 85:10)

Transcript

<u>Citation</u>	<u>Question / Answer</u>
4:13 - 4:15	Q Good afternoon, Mr. Jacobson. Can you introduce yourself for our record? A I am Robert Jacobson. Summary
4:16 - 21:18	Q Okay. MR. ENOCH: Mark, I'd like to ask a couple of questions and make a comment real quickly. MR. BANKSTON: I don't think you've been given any orders from the Court to do any discovery. So, no, Mr. Enoch, you're not asking this witness any questions. MR. ENOCH: Mr. Jacobson -- MR. BANKSTON: Mr. Enoch -- MR. ENOCH: -- were you served with a subpoena? MR. BANKSTON: Mr. Enoch, please point me to the order in which you've been allowed to do any discovery or take any questions of any witness. Point me to it, Mr. Enoch. MR. ENOCH: Please do not -- MR. BANKSTON: Right now, point me to it. MR. ENOCH: Please do not interrupt. MR. BANKSTON: Then you're going to -- Mr. Enoch, stop talking to the witness. MR. ENOCH: Mr. Jacobson -- MR. BANKSTON: Mr. Enoch, this deposition will be suspended; and I will seek sanctions if you speak one more time to this witness. MR. ENOCH: Mr. Jacobson, have you been served with a deposition subpoena? MR. BANKSTON: Mr. Enoch, we're going off the record. We're done. The deposition's done. MR. ENOCH: We are not going off the record. MR. BANKSTON: The deposition is suspended. MR. ENOCH: We are not going off the record. MR. BANKSTON: You have no ability to take any testimony, Mr. Enoch. None. Zero. MR. ENOCH: Mr. Bankston, I suggest instead of getting emotional about it, if you'd let me ask this question -- MR. BANKSTON: No, we're not going to allow you any questions, Mr. Enoch. MR. ENOCH: Please don't interrupt me again. MR. BANKSTON: Mr. Enoch, you have no right to ask your questions. Before you ask that question -- a single question to that witness again, direct me to what authority you think you have to -- MR. ENOCH: Did you serve a subpoena on this witness? MR. BANKSTON: I don't -- I served a Notice of Deposition on this witness. MR. ENOCH: Sir, if you didn't serve a subpoena, he's under an NDA and a confidentiality agreement. He is not excused from that. You did not provide him with an order from this Court. He cannot testify today. You should have served him with a subpoena, and you did not. MR. BANKSTON: Do you want to take this up with the judge -- MR. ENOCH: No, sir. MR. BANKSTON: -- or are you going to let him testify today? MR. ENOCH: That's what I want to talk with this witness about. MR. BANKSTON: You're not going to talk to him about it. MR. ENOCH: Well -- MR. BANKSTON: You don't have the ability to do discovery. I'm going to ask this witness questions. If you -- MR. ENOCH: Mr. Bankston -- MR. BANKSTON: If you instruct him not to answer and try to prevent this deposition from happening, I will take it up to the Court. MR. ENOCH: Mr. Bankston, you are the one preventing me from asking any questions. MR. BANKSTON: I am. MR. ENOCH: Then do what you need to do, sir. MR. BANKSTON: That's what we're gonna do. MR. ENOCH: I'm going to make sure this witness knows of his obligations under the non-disclosure agreement and confidentiality agreement that he signed. Are you going to -- MR. BANKSTON: You sent him a letter telling him what his confidentiality agreements are, telling him to observe them. You have already had these communications with this witness. You have no reason to ask this witness any questions today. The Court has not granted your client any discovery whatsoever, and you will stop interfering with this deposition. You have no reason

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	<p>to be asking this client about confidentiality when you have already informed him of his obligations. MR. ENOCH: Mr. Bankston, I'm going to ask the question; and if you instruct him not to answer -- MR. BANKSTON: I don't represent this witness. MR. ENOCH: Mr. Jacobson, did you receive</p> <p>Summary</p>
21:19 - 21:25	<p>Q (BY MR. BANKSTON) Mr. Jacobson, I'm really sorry about all that. A Yes, sir. Q I believe the only -- I'm not sure if we got this question out. Did you introduce yourself for the record? A Yes, sir. I am Robert Jacobson.</p> <p>Summary</p>
22:1 - 22:2	<p>Q Okay. Did you used to work at InfoWars? A Yes, sir.</p> <p>Summary</p>
22:3 - 22:9	<p>Q When were you hired by InfoWars? A I was hired in 2004 by Alex Jones. Q Do you know what corporate entity you were hired by? A At the time I felt I was hired by Alex Jones, and he was an independent proprietor. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
22:10 - 22:14	<p>Q (BY MR. BANKSTON) Do you know today what entity your former employer claims you worked for? A Yes. Q What entity is that? A Free Speech Systems, LLC.</p> <p>Summary</p>
22:15 - 22:21	<p>Q Okay. When did your employment end? A My employment ended on May 1st of 2017 -- or April 30th. Q So am I right that that's over a decade that you were at InfoWars? A I was there for around 13 years, approximately.</p> <p>Summary</p>
22:22 - 23:5	<p>Q As an employee, did you have a confidentiality agreement of any kind? A Not for the first six years or so. Q Okay. So does that mean around 2010 or so the idea of confidentiality came up? A Confidentiality was passed around the office but was never given to me until years after; and it was more of a -- you know, sort of an ultimatum, sort of suggested, putting my livelihood at risk.</p> <p>Summary</p>
23:6 - 23:12	<p>Q Apparently -- I wanted to show you something I wanted to mark as Exhibit 1, but I believe Mr. Enoch has already highjacked that exhibit. So I am going to mark this as Exhibit 2. MR. ENOCH: Object to the sidebar. Move to strike. (Exhibit 2 marked.)</p> <p>Summary</p>
23:13 - 23:16	<p>Q (BY MR. BANKSTON) Mr. Jacobson, I've handed you what's been marked as Exhibit 2. Have you ever seen a copy of that before, or do you remember seeing that? A Yes.</p> <p>Summary</p>
23:17 - 24:16	<p>Q I want to direct you to the second page. I'm going to read the paragraph that appears on this page 2. "You are reminded that you have important continuing obligations under your confidentiality non-disclosure agreements with my client. You are expected to strictly observe those duties and obligations." Do you feel like you understand what obligations are being referred to here? A I do. Q Have you abided by those obligations? A Yes, sir. In fact, may I add something? My understanding of the non-disclosure is not to reveal any company secrets. I don't think abuse or abusive behavior inside the company constitutes company secrets. I don't think misbehavior inside the company by an adult who runs the business constitutes</p>

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	<p>company secrets. In fact, I'm here to try to bring light to the truth of abusive behavior inside the walls of InfoWars; and I don't think anything I say today violates the NDA, which would be constituting of company secrets, their formulas in how they produce the news. Nothing like that is going to be revealed today. What will be revealed is abusive behavior and the behavior of Mr. Jones and his staff. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
24:17 - 24:22	<p>Q (BY MR. BANKSTON) Did you understand that there was a judge here in Travis County who issued an order concerning this deposition today going forward?</p> <p>A No -- not sure, actually.</p> <p>Q Okay.</p> <p>A Fuzzy.</p> <p>Summary</p>
24:23 - 24:25	<p>Q Sitting here today, do you recall seeing a court order concerning your deposition?</p> <p>A Yes.</p> <p>Summary</p>
25:1 - 25:9	<p>Q Okay. Did you feel comfortable appearing for deposition without a court order? MR. ENOCH: Objection to form. Assumes facts not in evidence. Leading. You can go ahead and answer subject to those objections.</p> <p>A Again, I'm not sure of that. I mean, with or without a court order, I just feel it's the right thing to do.</p> <p>Summary</p>
25:10 - 25:12	<p>Q (BY MR. BANKSTON) When you first joined InfoWars, did you believe in its mission?</p> <p>A For the most part, yes.</p> <p>Summary</p>
25:13 - 25:23	<p>Q Tell me about the kinds of stories or things that you wanted to be working on when you first came to InfoWars.</p> <p>A When I first -- MR. ENOCH: Objection, form. A When I first arrived at InfoWars, my understanding of InfoWars and Alex's subject matter was the occult, esoteric politics, let's say, what's going on behind the curtain, things that politicians don't tell us in exposé, in that fashion. Fringe media, off the mainstream, but still honest was my impression.</p> <p>Summary</p>
25:24 - 26:7	<p>Q (BY MR. BANKSTON) Were you passionate about journalism at that time? MR. ENOCH: Objection to form.</p> <p>A I was passionate about filmmaking, and I wanted to be a documentary filmmaker. So in that aspect, yes, that does, I believe, fall under a broader umbrella of journalism. So when it comes to documentary films, I was on board. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
26:8 - 26:21	<p>Q (BY MR. BANKSTON) Did you want to do good journalism?</p> <p>A I did. MR. ENOCH: Objection, form. MR. BANKSTON: What's the form? MR. ENOCH: Well, under the Rules, I'm not sure it's -- I think you're leading the witness; and I think -- I'm not sure if I'm supposed to say objection, leading or form. I think I'm supposed to say both. So that's my objection. You're leading the witness. MR. BANKSTON: Okay. Can you scroll up to my last question? (Reporter complies.)</p> <p>Summary</p>
26:22 - 27:4	<p>Q (BY MR. BANKSTON) Mr. Jacobson, what does good journalism mean to you?</p> <p>A Good journalism means an objective reporting of facts. Somebody who can -- or if the journalist can remove his emotion and theory as much as possible from reporting what he sees or she sees with their own eyes and ears, empirical evidence reported to the public with very little bias.</p> <p>Summary</p>
27:5 - 27:17	<p>Q In your mind, what is the relationship between good journalism and corroboration of facts?</p> <p>A I think good journalism, if you're going to have a corroboration of facts, I believe the more witnesses and points of view of the same action or activity that is being reported on, the better. And, for example, just theoretically thinking, one person can't see both sides of the cup at once. So when two people are observing it at the same time, you get a better description of the object in question. And so</p>

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	<p>the more witnesses that have viewed it, the more impressions we can get after the fact of what has actually happened with the object that we're observing.</p> <p>Summary</p>
27:18 - 28:8	<p>Q In your first few years at InfoWars were you comfortable with the style of journalism and the stories you were working on? MR. ENOCH: Objection, form and leading. Anytime I make an objection like that, sir, you can go ahead and answer. THE WITNESS: Okay. MR. ENOCH: Let me say one thing. I may ask you not to answer based on a privilege. That's your choice. That's my client trying to protect a privilege; but when I object, say "Objection, form or leading," you can go ahead and answer. THE WITNESS: Okay.</p> <p>Q (BY MR. BANKSTON) Would you like me to ask that question again?</p> <p>A Yes, please.</p> <p>Summary</p>
28:9 - 28:16	<p>Q In those first few years at InfoWars, were you comfortable with the style of journalism and the stories you were working on? MR. ENOCH: Same objections.</p> <p>A I was comfortable with the films I was producing and helping Alex produce. I found them interesting; and I found that Alex did present enough expert testimony that it held water, in my mind.</p> <p>Summary</p>
28:17 - 28:19	<p>Q (BY MR. BANKSTON) All right, Mr. Jacobson. You understand this lawsuit has to do with Sandy Hook?</p> <p>A Yes, sir.</p> <p>Summary</p>
28:20 - 29:17	<p>Q I want to direct your attention then to that event, which is end of 2012, very beginning of 2013.</p> <p>A Okay.</p> <p>Q For that time period, the start of 2013, by that time, had the company changed, in your mind?</p> <p>A Absolutely. MR. ENOCH: Objection, form. Leading. A Absolutely.</p> <p>Q (BY MR. BANKSTON) Okay. Mr. Jacobson, I have a feeling that Mr. Enoch is going to object to just about every question I ask.</p> <p>A Okay.</p> <p>Q So what I would like you to do to accommodate this, because otherwise it's going to be super-disruptive on the deposition, take a couple-of-second pause before you answer my questions because he's going to step on your answers. Okay?</p> <p>A Okay.</p> <p>Q If you can, just take a second pause. And what I'm going to do is ask you that question again because it got kind of disrupted, and I think Mr. Enoch's going to object again.</p> <p>A Okay.</p> <p>Summary</p>
29:18 - 29:23	<p>Q And just for reminders, we may in typical conversations tend to try to finish each other sentences or talk over each other, not to interrupt each other, but to help us get to the point faster. It makes it very difficult on her.</p> <p>A Right.</p> <p>Summary</p>
29:24 - 31:1	<p>Q She has trouble writing down when two people are speaking at the same time. So this is why, if you can, if you can take a pause -- you might even want to check and look over to your former employer's counsel to see if there is going to be an objection -- that way we can keep the record clear.</p> <p>A (Witness nods head.)</p> <p>Q At the start of 2013, around that time period, in your mind, had the company changed? MR. ENOCH: Objection to form, leading.</p> <p>A Yes.</p> <p>Q (BY MR. BANKSTON) Tell me about that.</p> <p>A When I first started working for InfoWars, it was an operation with just a handful of employees as far as I know, possibly five or less; maybe a few more than I'm aware of. But I was working out of my own private office. Alex had a tiny office in the far south of Austin. He had one employee that I knew of, Ryan Schlickeisen; another employee who I'm not sure of her name. I can't really recall. But she</p>

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	<p>was a woman who tended his warehouse, which was in the far south side of Austin. And I'm not even sure where Alex was broadcasting out of. In 2010 he had a full-size facility. He had, as far as I know, over 60 people on his staff, if not more; and he had a full-blown studio. So it wasn't just different. It was dramatically different in every way, shape, and form.</p> <p>Summary</p>
31:2 - 33:5	<p>Q One of the aspects I want to direct your attention to is whether you, in your mind, felt that anything had changed in the company with regards to how it performed journalism.</p> <p>A I do.</p> <p>Q What are your thoughts about that?</p> <p>A I -- MR. ENOCH: Objection, form and -- yeah, objection, form. Excuse me. Go ahead. A I feel that Alex's formula definitely changed. He changed his formula from a complement of the website and films to no films anymore and more or less the radio -- the website, radio show, and films was the original form. He took the film part out, which I felt -- I felt the films were part of his kind of thing; and he went more radio show. And that's it -- website, as far as I know. So in that form of media, I kind of just felt like he just ditched an important part of his media. That's all. THE VIDEOGRAPHER: Would you mind clipping it just a little bit higher? Thank you.</p> <p>Q (BY MR. BANKSTON) Mr. Jacobson, in terms of InfoWars' consistency or process for corroborating facts, in your mind, had that changed between the start of your employment and the end of your employment? MR. ENOCH: Objection to form and -- object to form.</p> <p>A I feel that from the beginning, when I first started working there, the fact collection was mostly Alex and -- mostly himself was the researcher. By the end, Alex let a lot of others do research for him; and I don't know if these people were specifically qualified or experienced enough to do that kind of work.</p> <p>Q (BY MR. BANKSTON) A few months back do you remember calling me about this case?</p> <p>A Yes, sir.</p> <p>Q Why'd you do that?</p> <p>A I was concerned. I wanted to make sure -- I felt I was part of something, just being in that building, when all this was going down. I felt terrible what happened, even though I, myself, know I wasn't directly involved in, you know, putting this out there directly, just being in the building, I feel complicit. I feel I have to right a wrong that I was involved in. Even though I was part of that wrong, I want to at least stack a couple of correct decisions up with some of the mistakes that I have made in the past.</p> <p>Q When you say that you weren't directly involved in putting this out there, what is "this"?</p> <p>A "This" would be Sandy Hook. Anything that InfoWars put out concerning Sandy Hook, I had absolutely no involvement in.</p> <p>Summary</p>
33:6 - 35:22	<p>Q During your employment, were you exposed to InfoWars' coverage of Sandy Hook?</p> <p>A During my employment, I had other assignments to do; and I wouldn't much pay attention to the show. However, when I did and I heard about Sandy Hook, it actually bothered me.</p> <p>Q Tell me what you mean by that. What did you hear that bothered you?</p> <p>A I heard them making accusations based on extremely narrow cross-sections of information, that I did my best to make the writers and the staff aware that what they were doing was speculation based on not enough information. It bothered me. That bothered me that I felt they had no concept of journalist ethics. Q Did you tell anyone at InfoWars your feelings about the Sandy Hook coverage?</p> <p>A I attempted to make it as clear as possible to the writers that there is something called journalist ethics and how what they were doing was in a direct violation of that anytime I caught wind of the Sandy Hook story on InfoWars. Now, mind you, I would like to add that it's not something I was thinking about all the time, considering I had other things to do. I'd be working on other projects. But when it would come on the screen, I would make it my business to go in to the writers and explain to them as clearly as possible that there is journalist ethics; and I tried to demonstrate what those ethics are and why they are violating them and what the damage could possibly be. In fact, I remember -- I must have been in that room four to five times, at least, and only to be received with laughter and jokes. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say "the room," is there a specific room you're talking about?</p>

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	<p>A The room I'm talking about is the room in which the writers worked. Q About how many writers are we talking about involved in working on Sandy Hook? MR. ENOCH: Objection to form.</p> <p>A I believe that there were two -- one primary writer and perhaps one other that were definitely involved in Sandy Hook. MR. BANKSTON: Just so I can possibly clear up that objection, what is the objection to how many writers worked on Sandy Hook? MR. ENOCH: You haven't established he has personal knowledge, sir. MR. BANKSTON: Okay. Q (BY MR. BANKSTON) Just to help clear up this issue -- and I believe this has been asked if; so you have to answer it again, I'm sorry -- but you were exposed to InfoWars' coverage of Sandy Hook?</p> <p>A Yes. Q You would know how many people are working on Sandy Hook -- MR. ENOCH: Objection --</p> <p>Q -- inside InfoWars? MR. ENOCH: Objection to form and leading.</p> <p>A I'm aware of every staff member that worked at InfoWars as of up to May of 2017.</p> <p>Q (BY MR. BANKSTON) When it came to coverage of Sandy Hook and the work that was being done by the writers, did you see things that you would consider reckless?</p> <p>A Yes.</p> <p>Summary</p>
35:23 - 36:4	<p>Q Can you tell me, are there any individual employees that you believed engaged in reckless conduct regarding Sandy Hook?</p> <p>A Yes. MR. ENOCH: Objection to form and leading. A Yes, I do.</p> <p>Summary</p>
36:5 - 36:8	<p>Q (BY MR. BANKSTON) Okay. Tell me who the employees are that you developed opinions about their work on Sandy Hook.</p> <p>A First and foremost would be Rob Dew.</p> <p>Summary</p>
36:9 - 36:17	<p>Q Okay. Let's start with Mr. Dew. What is your observations about Mr. Dew's journalistic integrity as it respects Sandy Hook allegations? MR. ENOCH: Objection to form.</p> <p>A I feel that Mr. Dew was overzealous to receive any type of hint that perhaps this might have been a phony act, a staged act. Any type of whisper that came through to him, he would celebrate. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
36:18 - 36:19	<p>Q (BY MR. BANKSTON) Do you know Adan Salazar?</p> <p>A Yes, sir.</p> <p>Summary</p>
36:20 - 41:5	<p>Q Have you seen or did you ever observe any work being done by Adan Salazar on Sandy Hook?</p> <p>A Yes. Q Do you have an opinion as to whether that work was done responsibly by Mr. Salazar? MR. ENOCH: Objection to form.</p> <p>A I do have an opinion of that. Q (BY MR. BANKSTON) Can you tell me what facts and observations you may have seen that would inform that opinion of Mr. Salazar? MR. ENOCH: Objection to form.</p> <p>A Like I've stated already, whenever the subject came up, I would immediately clarify to the writers that there is a journalistic ethics that they're violating; and what I've pointed out to Adan specifically is that you're taking the word of one witness primarily and a couple of speculative other facts and calling it the truth without actually going down and investigating it ourselves or actually going with our own reporters and corroborating what these people are saying. I made it aware to Adan that Wolfgang Halbig could have a lot of issues that we're not considering, that by taking the word of this one man so heavily with such a great accusation that he's accusing people of is so irresponsible, so damaging. I asked him to consider the size of the audience. And Adan Salazar responded with -- and I'm going to quote him because he said it to me many times -- "I want to print up a T-shirt that says, 'Halbig was right.' I want bumper stickers that say, 'Halbig was right,'" to a laughing room. MR. ENOCH: Objection, nonresponsive. Q (BY MR. BANKSTON) Do you feel that Mr. Salazar ever mocked your concerns about Sandy Hook coverage?</p> <p>A Absolutely. MR. ENOCH: Objection to form. A Absolutely.</p> <p>Q (BY MR. BANKSTON) Let's talk about -- you mentioned the name Mr. Halbig, correct?</p>

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	<p>A Yes, sir. Q Can you briefly describe who Mr. Wolfgang Halbig is?</p> <p>A As far as I can recall, whenever Sandy Hook was on the air or Alex or whoever was hosting was covering Sandy Hook, it was always accompanied by Mr. Halbig. And when I took a look at Mr. Halbig and considering he was the one and only person and the claims -- or as far as I know, he was the one and only person because whenever I would tune in, he was always on. So based on that impression, I would say he was the one and only person. And every time I saw him, I saw somebody that if he was amongst a group, a large group of people, okay; but a one and only person, I felt that this person may have mental problems. This person may have a lot of emotional problems. He could be a lonely man. He could be somebody looking for attention. There could be a lot of questions to be asked before we present forward as a news organization such a heavy accusation as accusing the parents of slaughtered children of being liars. I think that perhaps we should have asked the question "what is Wolfgang Halbig's story" before we put this story to the public. This story should never have been put forward to the public at all without -- and if they knew ethics in journalism, they would have known that immediately; but they have absolutely no ethics experience, in my opinion. Therefore, the story went forward; and the damage was caused. MR. ENOCH: Objection, nonresponsive. Q (BY MR. BANKSTON) Mr. Jacobson, I think it's fair to say you have strong opinions about Mr. Halbig?</p> <p>A I do. I have strong opinions about his validity as a sole witness.</p> <p>Q Okay. MR. ENOCH: Objection to form -- same objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Who is Halbig's points of contact at InfoWars? Who did he talk to? MR. ENOCH: Object to form.</p> <p>A I don't know. As far as I know, it's the people handling who were handling the Sandy Hook story. MR. ENOCH: Objection, nonresponsive. MR. BANKSTON: What's the form to asking him who Halbig's point of contact is? MR. ENOCH: Speculation, sir. Mr. Bankston, when I -- when you ask me a question, the Rules require that I respond to you clearly. I did so. MR. BANKSTON: You did. MR. ENOCH: No reason to chuckle, sir. MR. BANKSTON: It's funny, Mr. Enoch. I'm sorry if the things that happen in this deposition are funny. MR. ENOCH: I think it's unprofessional, sir. MR. BANKSTON: I think it's unprofessional for a witness to talk about having information from CIA kill teams about Las Vegas, and that's why I chuckle at it. I think it's unprofessional for you to make constant objections even when they have no legal basis. That's why occasionally, yes, you will see the corners of my mouth turn and smile. I'm obviously asking about his personal knowledge. That's what I'm asking him about. So that is why I smile.</p> <p>Q (BY MR. BANKSTON) Are you familiar with the types of claims made by Mr. Halbig?</p> <p>A Some of them.</p> <p>Summary</p>
41:6 - 41:24	<p>Q I want to ask you about some claims and if you know what they are. Have you ever heard the claim from Mr. Halbig or repeated from Mr. Halbig by somebody else that the school was actually closed before the shooting? MR. ENOCH: Objection to form.</p> <p>A I have heard, yes.</p> <p>Q (BY MR. BANKSTON) Did you see anything in your time at InfoWars that would make you think that people were acting irresponsibly as it concerns that particular claim? MR. ENOCH: Objection to form. You may answer.</p> <p>A Yes.</p> <p>Q (BY MR. BANKSTON) What kinds of things did you see -- excuse me. Scratch that. Who did you see acting irresponsibly with respect to that claim? MR. ENOCH: Objection to form.</p> <p>A Mr. Robert Dew and Mr. Adan Salazar.</p> <p>Summary</p>
41:25 - 42:7	<p>Q (BY MR. BANKSTON) Are you familiar with the claim that no paramedics were allowed inside of the building?</p> <p>A I mean, I've heard it.</p> <p>Q Okay. It's not something you had direct exposure to?</p> <p>A No, outside of me just briefly watching it on a video as if I was audience.</p> <p>Summary</p>

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42:8 - 42:11	<p>Q Have you ever heard the allegation that there are photographs of children who are supposedly dead who are actually alive?</p> <p>A Yes, I've heard that allegation.</p> <p>Summary</p>
42:12 - 42:23	<p>Q Do you -- from what you have seen inside of InfoWars, have you seen anything that has caused you to form an opinion about that allegation? MR. ENOCH: Objection to form.</p> <p>A I mean, you know, my opinion is it's so distasteful -- and it happened a while ago, that -- you know, it happened a while ago. So it was just all these things seem to -- all of the little allegations that Halbig and all these other people set forward, I sort of see it as individual cross-sections of information that each one was improperly handled. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
42:24 - 43:4	<p>Q (BY MR. BANKSTON) Did you ever voice any criticism of Mr. Halbig specifically while you were at InfoWars?</p> <p>A Yes, I did.</p> <p>Q Who did you voice that criticism to?</p> <p>A Adan Salazar.</p> <p>Summary</p>
43:5 - 43:11	<p>Q Are you familiar with the Sandy Hook parent Leonard Pozner? Have you heard that name?</p> <p>A I have heard the name.</p> <p>Q Okay. Have you ever seen written communications, like e-mails, from Mr. Halbig? Have you seen what his e-mails look like?</p> <p>A No, I haven't.</p> <p>Summary</p>
43:12 - 43:21	<p>Q Okay. Do you know if Mr. Halbig ever came to InfoWars? Did he ever come to the Austin location?</p> <p>A I'm not aware of that. Q Okay. Do you happen to know whether anybody ever from InfoWars went to visit Mr. Halbig in Florida?</p> <p>A Again, I'm not sure.</p> <p>Q Okay. Do you know anything about InfoWars helping raise money for Mr. Halbig? MR. ENOCH: Objection to form.</p> <p>A I'm unaware of anything like that.</p> <p>Summary</p>
43:22 - 44:1	<p>Q (BY MR. BANKSTON) Okay. Are you aware of Mr. Halbig ever engaging in any sort of harassing behavior towards people involved in Sandy Hook?</p> <p>A I've never heard of Halbig himself engaging in that kind of behavior.</p> <p>Summary</p>
44:2 - 44:3	<p>Q Okay. Do you know who Dan Bidondi is?</p> <p>A Yes, sir.</p> <p>Summary</p>
44:4 - 44:8	<p>Q Can you describe what Mr. Bidondi has ever done for InfoWars?</p> <p>A Mr. Bidondi worked for InfoWars briefly, for about a year or so; and he served as an on-air reporter and journalist.</p> <p>Summary</p>
44:9 - 44:13	<p>Q Okay. Are you aware if Mr. Bidondi ever went to Newtown to cover Sandy Hook?</p> <p>A I'm not sure. I don't know.</p> <p>Q Have you ever met Mr. Bidondi?</p> <p>A Yes, sir.</p> <p>Summary</p>
44:14 - 46:13	<p>Q Okay. If you were going to pick someone to treat this story with respect and sensitivity, would you pick Mr. Bidondi?</p> <p>A No, sir. MR. ENOCH: Objection to form and leading. A No, I wouldn't.</p> <p>Q (BY MR. BANKSTON) Can you explain why not? MR. ENOCH: Same objections.</p> <p>A Because Mr. Bidondi is very emotional and when -- and he's also very belief based and I always viewed him as more of somebody who could be a character than more of a journalist. And to send</p>

	<p>somebody like that with such a serious accusation to cover that, especially to talk and conversate with Mr. Halbig, knowing Bidondi, how impassioned he gets over these things and how impressionable he is with these kinds of scenarios, especially with conspiracy kinds of situations -- Mr. Bidondi gloms onto conspiracy kind of situations; he really magnates towards them -- no, I wouldn't because he would, I think, bias the situation and not fairly report it and be over-emotional. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say that Mr. Bidondi tends to glom onto conspiracy scenarios, can you tell me what you mean by that? MR. ENOCH: Objection to form.</p> <p>A I mean that he really -- you know, a lot of his programming when he was working at InfoWars had to do with the occult and all this stuff; but a lot of it also has to do with, for example, a big claim to fame for Dan Bidondi would be the Boston -- his appearance as a reporter for the Boston bombing. He made a national spectacle of himself and in an unprofessional way, which, of course, made him a celebrity at InfoWars. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) When you say that him making a spectacle made him a celebrity at InfoWars, can you tell me what you mean by that? MR. ENOCH: Objection to form, leading.</p> <p>A He basically accused -- instead of asking a question at the Boston bombing situation, he made an accusation in which case he was escorted out of the building in typical, you know, journalist activist style, which has been popularized by InfoWars; and because he did that, he was much celebrated by the people at InfoWars. And for a moment there, you know, he was on the top of his game, I suppose, inside that office. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
46:14 - 48:6	<p>Q (BY MR. BANKSTON) When you were at InfoWars, in general, if a person did something in public that was agitating, was that good for their career at InfoWars or bad for their career at InfoWars?</p> <p>A It was -- MR. ENOCH: Objection to form. A It was excellent for their career. I can point to several examples where it's not reporting at all; it's pure agitation by many members of the staff. And I have also been very critical of that. It's been pure -- in fact, some of it is so agitating it's almost to the level of public disruption, so -- including -- can I go on?</p> <p>Q (BY MR. BANKSTON) Please. MR. ENOCH: Objection, nonresponsive so far. Q (BY MR. BANKSTON) Let me ask you another question. Can you give me an example of some of the things you're talking about when you say "agitation"?</p> <p>A Yes. Ms. Millie Weaver last year or the year before that -- I'm not sure when; but it was in the last, perhaps, twelve months, I believe, because it was after I left -- she showed up at a Hillary Clinton book signing event that was at BookPeople. These people were not there to protest. These people were not there to...Hillary. This was far after the election. Nobody was campaigning. But Ms. Millie Weaver decided to show up with a lot of Trump gear, which obviously is going to be -- as we follow the news, we know it's agitating towards -- in a very political way, you know. And so, in my opinion, just by looking at that, I noticed that reporters don't show up sponsoring politicians. So for her to go there and say -- and, in fact, the name of this video on YouTube is called Journalists Harassed or something. She identifies herself as a journalist while she shows up wearing political gear directly aiming at the opposite end of the spectrum, asking abrasive questions about Hillary Clinton. Now, that's not journalism. That's agitation; and that is a clear-cut case example of them swapping out the words "agitation" for "journalism" and vice versa. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
48:7 - 49:8	<p>Q (BY MR. BANKSTON) Have you ever seen anyone at InfoWars engaged in conduct that you believed was designed to elicit a negative emotional reaction from the subject being interviewed? MR. ENOCH: Objection to form and leading.</p> <p>A I've never been involved in, let's say, people planning such things. However, I've never worked with Millie Weaver closely or Owen Schroeder closely. These guys show up -- both of them show up -- Owen, I don't find to be -- I think he's very -- in my opinion, he's a very smart guy. So he must know what he's doing by showing up at these political events wearing Trump hats and whatnot. He must know the difference between a journalist and an agitator, how a journalist has to appear neutral in his stance and how an agitator appears politically motivated on one side or the another at the moment, present in the spot. So I don't know about Millie, but I do know that Owen Schroeder should definitely</p>

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	<p>know the difference. So that being said, I mean, I've never been involved in, let's say, let's go down there and cause a fight kind of discussion; but I do know that they should know better, showing up at these places with these kinds of -- you know, this kind of gear that will affect people's emotions is pretty obvious. MR. ENOCH: Object, nonresponsive.</p> <p>Summary</p>
49:9 - 49:13	<p>Q (BY MR. BANKSTON) While you were at InfoWars, did you ever hear anybody inside the organization express negative feelings about the Sandy Hook parents? MR. ENOCH: Objection to form.</p> <p>A No, except for what Alex said live on the air.</p> <p>Summary</p>
49:14 - 51:2	<p>Q (BY MR. BANKSTON) Were you uncomfortable with the things that Mr. Jones said on the air?</p> <p>A Yes, I was. MR. ENOCH: Objection to form and leading. I'm sorry. Would you just hesitate, please, before you give your answer? THE WITNESS: Yes, sir. MR. ENOCH: Thank you.</p> <p>Q (BY MR. BANKSTON) Specifically as it regards to comments about the Sandy Hook parents, were you ever disturbed by anything you saw at the set on InfoWars? MR. ENOCH: Objection to form.</p> <p>A I was disturbed by the way they said Mr. Pozner changed; he went from a laughing stance to a serious stance when the camera was on him briefly before he was asked to call. I wanted to -- you know, again, this is another thing I attempted to clarify with Mr. Salazar and others that when you go through an extreme tragedy, your emotions are all over the place. And this is a known fact. Just because somebody laughs at a joke somebody tries to -- you know, you're not immune to humor even if you went through a massive tragedy. For a brief moment somebody could say something; and it's, "Oh, ha, ha." You know, you don't have any really control over if somebody makes you laugh. You don't have that control. And I tried -- just because somebody went through a massive tragedy doesn't mean that you have to jump on the guy for smiling right before the camera was on him. In fact, a lot of people who experience this level -- well, I don't know about this level -- but tragedy in their life, they don't begin to even mourn until days after. They go through shock. So I was disgusted and I did attempt to clarify to everybody that people go through a range of emotions after a traumatic event. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
51:3 - 51:15	<p>Q (BY MR. BANKSTON) Have you ever while working at InfoWars heard the term "crisis actors"?</p> <p>A Yes. Q What do you understand that term to mean?</p> <p>A I believe it means that there are people from Special Forces, let's -- per se, or something like that. They are people from a nefarious group run through the government or outside for special -- special interest money, let's say, who will then attempt to cause a phony event to -- like, for example, crisis actors faking their death or things like that to change a shift in policy or things like that. That's what I understand a crisis actor to be.</p> <p>Summary</p>
51:16 - 52:1	<p>Q Have you ever heard while at InfoWars the term crisis actors or a similar allegation being attached to the Sandy Hook event? MR. ENOCH: Objection to form.</p> <p>A Yes, I have. Q (BY MR. BANKSTON) While you were at InfoWars did you feel that you would ever see evidence which you would consider sufficient to responsibly make that allegation on the air? MR. ENOCH: Objection to form.</p> <p>A No.</p> <p>Summary</p>
52:2 - 52:18	<p>Q (BY MR. BANKSTON) What is your personal feeling, sitting here today, about an allegation that there were crisis actors in use at Sandy Hook? MR. ENOCH: Objection to form.</p> <p>A I mean, my opinion is -- my personal feeling is it was shocking to hear -- well, it wasn't shocking that they went down that line because they went down that line of thought before; but the weight of the accusation in this particular case, it was shocking that they didn't do more research. They didn't go further into it. They didn't -- I mean, what I constantly tried to clarify is a story of this level should not be brought forward unless they are -- I tried to make it clear that they need as much evidence in this story as if they were going to court to prove their case; and if they didn't have that, they didn't have a</p>

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	story. MR. ENOCH: Objection, nonresponsive. Summary
52:19 - 52:22	Q (BY MR. BANKSTON) Can you tell us who Paul Watson is? A Paul Watson is sort of Alex's alternate host. He's basically like Alex's sidekick. Summary
52:23 - 53:1	Q Okay. Have you ever been aware of Mr. Watson's opinions about the Sandy Hook hoax allegations? A No. Summary
53:2 - 53:8	Q Do you know of anyone else at InfoWars who ever voiced an objection regarding any element of the Sandy Hook coverage or the coverage as a whole? A I don't know if -- I mean, I did it independently on my own; and then I would have talk to others about it. MR. ENOCH: Objection, nonresponsive. Summary
53:9 - 53:20	Q (BY MR. BANKSTON) Have you ever had any private conversations with any of your coworkers at InfoWars about negative reservations about the Sandy Hook coverage? MR. ENOCH: Objection to form. A Yes. Q (BY MR. BANKSTON) And what coworkers would that be? A I spoke with Ashley Beckford. I spoke with... I spoke with Adan Salazar. I spoke with Kit Daniels. I spoke with... I must have spoken -- and others I don't recall. I have spoken quite a bit. Summary
53:21 - 53:22	Q Can you tell us: Who is Kit Daniels? A Kit Daniels is a writer at InfoWars. Summary
53:23 - 53:25	Q Was Kit Daniels ever involved in any of the Sandy Hook coverage? A I'm unsure. Summary
54:1 - 54:4	Q Okay. Are you familiar with an allegation concerning an alleged blue screen video interview with Anderson Cooper? A I am. Summary
54:5 - 54:7	Q When you were at InfoWars, did you ever work in video technology? A Yes, I did. Summary
54:8 - 54:22	Q Okay. Can you explain to us kind of your background and your training and experience in video technology? A My background began in New York City. I was working for several audio recording studios, including The Hit Factory in New York City, which is a legendary studio. I moved to Austin shortly after that. I worked for the Austin Music Network -- before that I worked for a music studio here, in Austin, Texas. I then worked for the Austin Music Network for about three and a half years, where I got even better. Then I moved from there and I worked for Alex for 13 years producing roughly ten of his feature-length documentaries. MR. ENOCH: Objection to form -- objection, nonresponsive. Summary
54:23 - 55:2	Q (BY MR. BANKSTON) Can you explain to us: What is blue screen compositing? A Blue screen compositing is when you can stand in front of a blue screen and you can add any background you'd like behind you, so. Summary
55:3 - 55:11	Q Okay. Mr. Jacobson, I am going to play you a video clip that is going to be Exhibit 2 to this deposition. MR. ENOCH: I think it's Exhibit 3. MR. BANKSTON: Oh, it will be, yeah. Change that number. (Exhibit 3 marked.) MR. BANKSTON: Let me ask that question again, Mr. Jacobson. Summary
55:12 - 55:18	Q (BY MR. BANKSTON) Mr. Jacobson, I'm going to show you a video clip that is going to be Exhibit 3 to this deposition. That is a video clip from a part of an InfoWars episode. So I'd like you to

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	<p>watch it, and I'm going to ask you some questions about it. Okay?</p> <p>A Okay. (Video playing.)</p> <p>Summary</p>
55:19 - 56:15	<p>Q (BY MR. BANKSTON) First, Mr. Jacobson, based on your training and experience in video technology, was what we just saw clearly blue screen?</p> <p>A It was -- MR. ENOCH: Objection to form. A It was not clearly blue screen.</p> <p>Q (BY MR. BANKSTON) Okay. Would anybody with competent video experience think this was blue screen? MR. ENOCH: Objection to form.</p> <p>A Not at first view.</p> <p>Q (BY MR. BANKSTON) Would anybody with competent video experience have serious doubts about saying this was blue screen? MR. ENOCH: Objection to form.</p> <p>A I feel they would. They would be on the fence. If they saw this video, they would have questions.</p> <p>Q (BY MR. BANKSTON) Okay.</p> <p>A Can I go further and explain that?</p> <p>Q Actually, let me ask you a question on that. Okay?</p> <p>A Okay.</p> <p>Summary</p>
56:16 - 57:21	<p>Q Your opinion about whether or not it could be fairly asserted that this is clearly blue screen, in forming your opinion on whether that could be asserted, can you tell me about any of the things you see in this video or any of your experience that would inform that opinion?</p> <p>A There's nothing -- MR. ENOCH: Objection -- I'm sorry. Objection to form. Please continue. A There's nothing in that video that will clearly indicate to me that that was a blue screen event.</p> <p>Q (BY MR. BANKSTON) Okay. And so if a witness -- if anyone was to say, "I can look at that video. I work with blue screen. It's got all the telltale signs. That's clearly blue screen," in your opinion, is that person acting responsibly? MR. ENOCH: Objection to form.</p> <p>A No, I don't. I think that, based on what we see on that screen, that could be -- that error in the nose would have been caused by a number of different reasons; and none of them are clear from what we see there without knowing what happened behind the scenes with the operating room controllers, so on and so forth. That could have been a natural glitch that happens all the time on YouTube. We see it all the time where pixels smudge. There is no secret about that. There must be a million videos or more where pixels smudge all the time. In order for that -- should I continue?</p> <p>Summary</p>
57:22 - 60:6	<p>Q If you do have more facts that you are basing your opinion on.</p> <p>A The only thing I can tell you about that is the only way that that is possibly green screen is if Anderson Cooper is not standing next to that woman. MR. ENOCH: Objection, nonresponsive to the entire answer, including after the continuation of the question "if you have more facts."</p> <p>Q (BY MR. BANKSTON) When you say, "That means Anderson Cooper wasn't standing next to that woman," are you making an opinion about whether the woman in the video was actually on location? MR. ENOCH: Objection to form, leading.</p> <p>A I'm not making opinion on anything. What I'm saying is: If his nose was cutting off, that means he stepped out of the green screen or the blue screen bounds; and his nose was cut off, which would suggest she was somewhere else. He was standing in one room, she's standing somewhere else. That's what it would mean. If he stepped outside the -- and she's not outside the green screen bounds, how could he have stepped outside the green screen bounds if she is -- she would be disappeared. She wouldn't even be on the screen. We would see -- if that was green screen, we would see -- she would either -- it would be a cut-out. See, what they're suggesting is Anderson Cooper, okay, would be in this screen. Everything else would be green. He would be -- they would composite behind him the town hall scene that you see behind him. He would step outside, and his nose would get cut off. She would also be outside that box. If the box is only this big and he steps outside, she would also be outside that box, part of the composite, which would mean that she would have to be on location while he was somewhere else. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Would it be accurate to say if this theory of how -- if the setup that you're describing is true, would it be accurate to say then that the woman in the interview would not be</p>

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	<p>actually looking at Anderson Cooper? A That's what it would mean. MR. ENOCH: Objection to form and leading. A It would mean that what you see in there is two people who are acting remarkably responsive to each other on a super-human level, in my opinion, because, you know, they wouldn't be looking at each other. She would be in one location. He would potentially be, according to this theory, in a CNN studio around the corner, down the block, miles away, if not on the other side of the globe. So they would not be in the same place at the same time to have that interaction if he stepped outside the bounds of the green screen and his nose got cut off. MR. ENOCH: Objection, nonresponsive. Q (BY MR. BANKSTON) Now, if somebody is wearing glasses in a green screen shot -- A Uh-huh. Summary</p>
60:7 - 61:10	<p>Q -- will the green screen background that's being composited, will that show up in the reflection of their glasses? MR. ENOCH: Objection to form. A Sometimes. Q (BY MR. BANKSTON) If there's a projection being used? MR. ENOCH: Objection to form. A Depending how the lights are. If the lights are blasting against that green screen, yes. If the lighting guy takes that into accounts, they can -- you know, depending on the lights. If the lights are bright and blasting at them, yes, you would see green screen. Also depending on his proximity to the screen. Q (BY MR. BANKSTON) Okay. Maybe -- I think maybe I didn't ask -- the question was a little inartful there. Let's come back up here. If there's lights being shined on the green screen -- A Uh-huh. Q -- then it might be possible to see green in some glasses? A Yes. MR. ENOCH: Objection to form. Q (BY MR. BANKSTON) My question is: If there's a background being put on that green screen, does it show up live there on the green screen; or is that just in the computer? MR. ENOCH: Objection to form. A It's just in the computer. Summary</p>
61:11 - 61:16	<p>Q (BY MR. BANKSTON) If a person's wearing glasses and they're being filmed against a green screen, will the projected image that's in the computer of the town hall, or whatever, appear in their glasses? MR. ENOCH: Objection to form. A Absolutely not. Summary</p>
61:17 - 62:3	<p>Q (BY MR. BANKSTON) Okay. Did you -- as a part of your discussions with people at InfoWars about Sandy Hook, have you raised complaints about this video allegation? MR. ENOCH: Objection to form, leading. A Not -- no. I mean, it was one of those things. I just kind of mixed it in with all the rest of it. It wasn't -- it was just one of those points that was just so silly. It's just I can't -- I couldn't believe that Alex was jumping all over that when he knows perfectly well YouTube pixels smudge. MR. ENOCH: Objection, nonresponsive. Summary</p>
62:4 - 62:11	<p>Q (BY MR. BANKSTON) Was any -- were you -- at any time during your time at InfoWars past 2013, were you aware that parents had been complaining about this coverage? A No, not immediately. I really became aware of it sometime afterwards when I saw, actually, I think, a PBS special on what was going on; and it really hit home at that point. I was like, this is... Summary</p>
62:12 - 62:25	<p>Q Well, you understand -- what is your understanding -- scratch that. Was the InfoWars staff aware of the public controversy they were causing with Sandy Hook allegations? MR. ENOCH: Object to form. A I believe they were. Q (BY MR. BANKSTON) Was the staff aware of the public opinion about their Sandy Hook coverage? MR. ENOCH: Object to form. A I believe they were. I believe that they were aware of a dual opinion at the same time, and they got a</p>

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	<p>rush out of it. MR. ENOCH: Objection, nonresponsive. Summary</p>
63:1 - 63:4	<p>Q (BY MR. BANKSTON) Were you still employed at InfoWars at the time that Mr. Jones was interviewed by Megyn Kelly? A No. Summary</p>
63:5 - 63:14	<p>Q Did you ever become aware that parents were being harassed by believers in the Sandy Hook hoax conspiracy theory? A Yes, I became aware of that. Q When do you think you became aware of that? A Somewhere around 2014, 2015. Maybe 2015. Like I said, when I saw that PBS documentary. Q So the PBS documentary you saw, that was when you were employed at InfoWars? A I was still employed there. Summary</p>
63:15 - 63:24	<p>Q In light of the harassment that you became aware of, did it cause you to form any opinions about the level of caution that would be required in covering Sandy Hook from then on out? MR. ENOCH: Objection to form, leading. A Absolutely. Like I've already stated, I marched into the writers' room several times and attempted to point out that they have an ethical responsibility to abide by. MR. ENOCH: Objection, nonresponsive. Summary</p>
63:25 - 65:6	<p>Q (BY MR. BANKSTON) Do you feel, based on your personal knowledge inside the company, that InfoWars was responsive to those criticisms and began to act appropriately? MR. ENOCH: Objection to form. A No, I don't. Q (BY MR. BANKSTON) Okay, Mr. Jacobson. We are about an hour in. A Uh-huh. Q As you know, your deposition was ordered for, I believe it was two or two and a half hours today. A Uh-huh. Q I'm not going to keep you that long, but I am going to take a short break. A Uh-huh. Q And we do have some more to cover. A Okay. Q We might get near two hours -- I don't know -- but I'm going to try to get you out as soon as I can today. But why don't we for the moment -- we'll take a 15-minute break. A Uh-huh. Q And then we'll come back and resume after our break. Thank you. MR. OGDEN: Hey, Mark. Will you call my cell phone? MR. BANKSTON: Absolutely. THE VIDEOGRAPHER: We are off the record at 1:12 p.m. (Off the record from 1:12 to 1:30 p.m.) THE VIDEOGRAPHER: We're back on the record at 1:30 p.m. Summary</p>
65:7 - 65:13	<p>Q (BY MR. BANKSTON) Mr. Jacobson, earlier we had talked about a writing room; and I want to ask you questions about that room itself. That room was the center of the writing process at InfoWars; is that right? A Yes, up until the last three years that I worked there. Summary</p>
65:14 - 65:21	<p>Q Okay. From your personal knowledge and observations of the writers, can you tell me, as it concerns the writing process for coverage of Sandy Hook, what, if anything, concerned you about that process? MR. ENOCH: Objection to form. A The fact that they took Halbig's word for it, and that was the article. The article was: Whatever came out of Halbig's mouth was news. Summary</p>
65:22 - 66:20	<p>Q (BY MR. BANKSTON) When you were, as you mentioned earlier, communicating your thoughts to people at InfoWars about the Sandy Hook coverage, can you describe to me on a scale of one, being</p>

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	<p>not outrageous at all and ten, being extremely outrageous, on that one-to-ten scale, what is the level of outrageousness of this conduct that you were trying to impart? MR. ENOCH: Objection, leading and form.</p> <p>A It was a ten.</p> <p>Q (BY MR. BANKSTON) Tell me why you thought that. MR. ENOCH: Same objections.</p> <p>A I mean, it's one thing to make a mistake. It's another thing to have somebody come in -- and I don't even -- I'm not aware if I was the only person or not, but I know I was doing it -- to come in and say, "Hey, this is wrong. You're making a mistake." It's one thing, you know, to actually have a mistake and something else to have it pointed out to you, not just once but over and over and over again, and to not only hear the damage that you're doing to people outside of your zone but to actually laugh about it, I thought that's a ten. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
66:21 - 66:24	<p>Q (BY MR. BANKSTON) How long have you known Mr. Jones?</p> <p>A I've known Mr. Jones since he employed me in 2004.</p> <p>Summary</p>
66:25 - 67:17	<p>Q In your 15 years of knowing Mr. Jones, have you arrived at any kind of opinion about whether Mr. Jones is capable of rational action or whether he is too mentally unwell to even be capable of rational action? MR. ENOCH: Objection to form and leading.</p> <p>A In my 15 years of knowing Alex, I feel he is very capable of rational actions, and I think the growth of his business is evidence of that. Like, while his opinions may be tasteless, he definitely made conscious decisions to run a business. He flipped the switches himself. In fact, he micromanages that place; and, obviously, some of the decisions he made were successful. He took a business from a few handful of people to what it is today. So based on that evidence, I do feel that he's more than rational in his decisions. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
67:18 - 67:23	<p>Q (BY MR. BANKSTON) Based on your conversations and years with Mr. Jones, do you have an opinion on whether or not Mr. Jones can understand right from wrong? MR. ENOCH: Objection to form.</p> <p>A Yes.</p> <p>Summary</p>
67:24 - 68:12	<p>Q (BY MR. BANKSTON) Okay. What is your opinion?</p> <p>A I think he -- MR. ENOCH: Objection to form. A I think he knows right from wrong, and he can definitely distinguish it. And, again, it's not just my opinion on this. He goes on the air and proselytizes morality all the time, which, clearly, he knows what's going on; and he's making a conscious decision. If he can proselytize it and verbalize it and actually articulate it that well to everybody, then, he's definitely thinking about it; and he's aware of what's going on. MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
68:13 - 68:19	<p>Q (BY MR. BANKSTON) With respect to your background, have you -- what is your level of experience and exposure to compositing live shots onto backgrounds?</p> <p>A I mean, in my experience, I've been asked to do it; and I've done it.</p> <p>Q Okay.</p> <p>A I've produced those videos.</p> <p>Summary</p>
68:20 - 68:25	<p>Q The films and things that you would make for InfoWars, did you perform any graphics work or compositing work while working on those videos?</p> <p>A Mostly graphics works. I mean, aside from my video editing, I would do graphics much more than video compositing for the films.</p> <p>Summary</p>
69:1 - 69:4	<p>Q Does InfoWars in it's studio -- during the years you were there, did it perform any green screen or blue green compositing there at the facility?</p> <p>A Yes.</p> <p>Summary</p>

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69:5 - 70:14	<p>Q When it comes to video technology, does that remain your profession today? A Yes. MR. ENOCH: Objection to form. A Yes. MR. BANKSTON: What's the basis on that? MR. ENOCH: I don't know what you mean by "video technology." It's vague and ambiguous. Q (BY MR. BANKSTON) Do you know what video technology is? A Yes, sir. Q When I ask you the question, you work in video technology, can you tell me what you mean by video technology? A I take technology designed to work on video as my tools and create a product for my clients. Q When it comes to video technology, are you someone who considers himself to have specialized knowledge or skill in that technical field? MR. ENOCH: Object to form. Speculating, form, and leading. A Yes. Q (BY MR. BANKSTON) Okay. Can you tell me how many years experience you have in working with video production and video technology? MR. ENOCH: Objection to form. A I have 17 years in video technology, and I have over 20 years -- over 20 years in media technology in general. Q (BY MR. BANKSTON) You understand the difference between a layman and a technical person? Do you understand those terms? A Yes, sir. MR. ENOCH: Objection to form. A Yes, sir. Summary</p>
70:15 - 70:21	<p>Q (BY MR. BANKSTON) When it comes to video production and video technology, do you consider yourself a layman; or do you consider yourself as someone who has technical expertise? MR. ENOCH: Objection to form. A I consider myself as somebody who has technical expertise. Summary</p>
70:22 - 71:15	<p>Q (BY MR. BANKSTON) Okay. Do you still have an opinion as to whether or not alternative media can be a force for good if done correctly? MR. ENOCH: Objection to form. A I feel that alternative media -- I think the subject is much bigger than that. I think that media in itself or journalism is when you cross the ethical boundary, then it will be a force for good; but if people are independent and refuse to abide by standards that are journalist standards that have been established for decades already and followed, or maybe even centuries by some standards, you know, if they refuse to do that, then no, it won't be a force for good. It will be a force for people to be confused and tear each other down. If they can figure out that, hey, who's going to be the standard of that. So I do think that there will always be a professional standard of journalism, and independent journalism should be put in its place. MR. ENOCH: Objection, nonresponsive. Summary</p>
71:16 - 72:1	<p>Q (BY MR. BANKSTON) When it comes to professionalism in journalism, do you have an opinion -- or let me scratch that. When it comes to professionalism in journalism, have you been exposed to events, perceived things with your own eyes and ears, that gives you an opinion on whether it went right or whether it went wrong as it regards Sandy Hook? MR. ENOCH: Objection, form. A I don't really have a comment on that. I'm not really sure. Summary</p>
72:2 - 72:12	<p>Q (BY MR. BANKSTON) Okay. Do you today have any sense of guilt about the coverage about Sandy Hook that came out of InfoWars? MR. ENOCH: Objection to form, leading. A Yes. As I mentioned in my statements previously, the reason why I'm here is because of a tremendous amount of guilt that I didn't act faster. Maybe I should have quit. Maybe I could have caught the story faster or been better at explaining; but, yes, I do. MR. ENOCH: Objection, nonresponsive. Summary</p>
72:13 - 72:17	<p>Q (BY MR. BANKSTON) Are you still on friendly terms with InfoWars? A No. Q Were you terminated? A Yes. Summary</p>

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72:18 - 72:19	<p>Q Have you filed a complaint with the EEOC?</p> <p>A Yes.</p> <p>Summary</p>
72:20 - 73:23	<p>Q And just for the record, I want to make it clear because I've used an abbreviation. You filed a complaint with the Equal Opportunity Employment Commission?</p> <p>A Yes, sir.</p> <p>Q Tell me why you filed a complaint.</p> <p>A Alex's abusive behavior and the unethical and racist behavior of his staff and the environment that's racist and abusive in general at InfoWars. MR. ENOCH: Objection, nonresponsive. Move to strike. A There was evidence against me that I submitted to the EEOC of myself being Photoshopped onto a Rabbi's face and passed around the office. There was Owen Schroeder sitting on the air calling me the resident Jew, as well as Rob Dew. There was a culture of anti-Semitism inside InfoWars. And so I went to the EEOC with that and a culture of abuse propagated mostly by Alex Jones himself. MR. ENOCH: Objection, nonresponsive.</p> <p>Q (BY MR. BANKSTON) Do you know, sitting here today, if you're the only person who's brought such a complaint or if there's anybody else who's brought similar complaints? MR. ENOCH: Objection to form.</p> <p>A I know of several people who have brought exactly the same complaint or similar, very similar complaints about Alex Jones and the office of InfoWars, many of which are public.</p> <p>Summary</p>
73:24 - 75:9	<p>Q (BY MR. BANKSTON) Do you feel that people might look at your EEOC claim and think you're biased?</p> <p>A I feel, yes, people will look at my EEOC complaint and claim that I'm biased. Should I continue?</p> <p>Q No. I have a question for you.</p> <p>A Okay.</p> <p>Q If you've got an EEOC claim and you've got bad blood with InfoWars, why should people believe you?</p> <p>A Because people should understand just because Alex -- I have a complaint with Alex doesn't make Alex an angel. Myself and others have all witnessed it. I am doing my due diligence in bringing forth abuse that Alex had against me as others have brought forth Alex -- abuse that Alex has against them as well as the fact that does not negate the fact that this stuff about Sandy Hook didn't happen, either. What happened to me is real. What Alex did to the Sandy Hook parents is also real at the same time. Just because one is true doesn't make the other untrue. They're both true at the same time. Alex is an abusive man. Alex -- and every testimony that you see in public, whether it is, you know, on the record -- you know, we have videos and specials all over the place, news articles written about this. It's no secret of Alex's behavior. It's no secret. Therefore, you know, just because I mounted a complaint because of Alex's bad behavior doesn't mean he behaved badly for Sandy Hook. People should understand just because one is true, the other -- it doesn't mean the other's automatically untrue. MR. ENOCH: Objection -- A Are they going to feel that I'm biased? Yes, but that doesn't mean -- you know, everything is true that I am saying. And again... MR. ENOCH: Objection, nonresponsive.</p> <p>Summary</p>
75:10 - 75:13	<p>Q (BY MR. BANKSTON) If the Sandy Hook parents who brought these suits were awarded money from Alex Jones, would it benefit you in any way?</p> <p>A No.</p> <p>Summary</p>
75:14 - 75:20	<p>Q If the Sandy Hook parents who brought these suits are awarded money from Mr. Jones, let's say, a significant amount of money, do you know of any way that could be a detriment to you?</p> <p>A The one way is if the EEOC rules in my favor, it might jeopardized a potential compensation for myself farther down the line.</p> <p>Summary</p>
75:21 - 85:10	<p>Q So you -- do you feel that if the Sandy Hook parents are ultimately compensated by Mr. Jones, do you have any opinion about whether that could potentially threaten your ability to get compensation for your injuries?</p>

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A I'm not doing any of this for compensation. I'm doing this because Alex is disgracing himself so badly in the way he has made the parents suffer, as well as myself. He's still on the air to this day saying things that are arguably true or arguably not true; we don't know. But we do know that he affects his audience in a way that angers and mobilizes them; and it's unclear if anything he's saying is fact or fiction, opinion or speculation. But what he does do is mobilize a large amount of people in irrational thinking because there's no way to tell whether what Alex is saying on the air is news or not, true or false, speculation, or opinion, jokes or not; but he advertises it all as news. He is the InfoWars. MR. ENOCH: Objection, nonresponsive.

Q (BY MR. BANKSTON) Mr. Jacobson, have -- all of your answers today, have they been based on your personal knowledge? MR. ENOCH: Objection to form.

A As far as I know.

Q (BY MR. BANKSTON) Okay. Mr. Jacobson, that's all I believe I have for you at this time. MR. ENOCH: Go ahead. I'm sorry. I didn't mean to interrupt you. MR. BANKSTON: Sure. That's all I have for you in terms of questions. I have a few things I need to put on the record. MR. OGDEN: Mark, can you check your e-mail? MR. BANKSTON: Yeah, sure. They don't need to concern you. If you would like to be excused while I put this on the record, I can do that. MR. ENOCH: And I would like to ask questions. Are you going to prevent me from doing that, Mark? MR. BANKSTON: We're going to talk about that on the record in just a minute. MR. ENOCH: Well, that's what I'm asking you. MR. BANKSTON: Yeah, so we're going to let Mr. Jacobson go because we're not going to have this discussion in front of a witness. MR. ENOCH: No, sir, we're not gonna -- MR. BANKSTON: We're not going to let him leave the building, Mark. We're going to let Mr. Jacobson go to the bathroom, and then I'm going to put something on the record. And if you have some things to say about it, you can say whatever you want on the record. And then Mr. Jacobson will be in the building. MR. ENOCH: Are you going to permit me to ask questions, yes or no? MR. BANKSTON: I don't think I can stop you. I literally don't think I can. I think I would have to, like, go over there and physically restrain you because you won't abide by rules; but Mr. Jacobson is just going to go to the bathroom. Now, he's going to come back; and he's going to sit down in that chair. And whether he wants to sit around and listen to anything you say is not my choice, but I'm not releasing him from the building right now. Mr. Jacobson, would you like to step out of the room, maybe, for a moment? You can use the restroom if you need to; otherwise, just wait in the front room for us. (Witness leaves the conference room.) MR. ENOCH: What is it you would like to say outside of his presence? MR. BANKSTON: Okay. I have a few things I need to put on the record. First of all, just to read it really quick, there is an order entered in this case concerning this deposition. In Paragraph 3 of the Judge's Discovery Order, it allows that Plaintiff's Motion is granted and that Plaintiff may take the deposition of Robert Jacobson. It does not say that the parties may take the deposition of Robert Jacobson. It says the Plaintiff may take the deposition of Robert Jacobson. The Civil Remedies Code provides that limited discovery will be allowed if the party shows good cause for that discovery and gets an order from the Court on that limited discovery. Plaintiff has gotten an order from the Court showing good cause. Defendants have never attempted to show good cause and, in fact, under the case law is extremely questionable and I see no authority for an idea that a defendant would ever be granted discovery on its own motion. The discovery is granted for the Plaintiff to meet the burdens, the onerous burdens caused by the TCPA. Nonetheless, Mr. Enoch has attempted right from the start to interrupt and hijack my deposition, which I have properly noticed, and start asking the witness questions, questions which the witness was visibly uncomfortable with. This witness agreed to appear voluntarily at this deposition with the understanding that he would be questioned by the Plaintiff's counsel. He has appeared without his own personal counsel and was suddenly ambushed by a barrage of questions from his former employer, questions he was not expecting. I need to put this on the record for we are now on our the third deposition of this case; and in the first deposition of Mr. Jones, which Mr. Enoch was not defending but was merely an observer, his name appeared in all caps where's he's speaking and interjecting into the record 28 times during the testimony of Mr. Jones; and that's taking out the times that it appeared for housekeeping matters, like getting the witness water or talking about the PO at the end of the deposition. And I don't want to be tag-teamed and it was ridiculous and improper but I normally wouldn't call it out on the record but I reviewed the transcript -- and I've done this to confirm this -- that there were questions on

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the floor about what a certain building was and whether it was the school or not. And as part of his interruption, Mr. Enoch blurted out to

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