

IN THE CIRCUIT COURT OF THE  
19TH JUDICIAL CIRCUIT IN AND  
FOR INDIAN RIVER COUNTY, FLORIDA

Case No.: 31-2015-CA-00961

THOMAS MIX,  
Counter-defendant/Plaintiff,  
vs.  
JEANETTE TYE RUNYON,  
Counter-claimant/Defendant.

\_\_\_\_\_ /

DEPOSITION OF THOMAS MIX

DATE: January 31, 2017

TIME: 9:25 o'clock a.m.

PLACE: Vero Beach Court Reporters  
3111 Cardinal Drive, Suite B  
Vero Beach, Florida 329634602 Kirby

TAKEN BY: Counter-Claimant/Defendant

REPORTER: Cynthia L. O'Cain

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A P P E A R A N C E S:

FOR COUNTER-DEFENDANT/PLAINTIFF:

ROONEY & ROONEY, P.A.

1517 20th Street, P.A.

Vero Beach, Florida 32960

BY: MATTHEW RANDALL GROOM, ESQ.

FOR COUNTER-CLAIMANT/DEFENDANT:

JEANETTE TYE RUNYON, PRO SE.

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1 AND THEREUPON,

2 THOMAS MIX

3 called as a witness on behalf of the  
4 Counter-Claimant/Defendant, after having been duly sworn,  
5 was examined and testified as follows:

6 DIRECT EXAMINATION

7 BY MS. RUNYON:

8 Q Well, good morning, everybody. Would you care  
9 to state your full legal name.

10 A Thomas Andrew Mix.

11 Q Your address?

12 A 1806 18th Avenue Southwest, Vero Beach, Florida  
13 32962.

14 Q And your date of birth?

15 A 12/20/1985.

16 Q How about some of your aliases?

17 A Meaning as?

18 Q Names that you use when you're not using your  
19 own name.

20 A Legally?

21 Q No. Just legally and by usage.

22 A Then I guess the only one would be Thomas Arzi,  
23 by the way that you're asking.

24 Q You've used other ones, haven't you?

25 MR. GROOM: Object as to form.

1 BY MS. RUNYON:

2 Q You've used other aliases?

3 A As in?

4 Q On the Internet and --

5 A Yes, on the Internet.

6 Q They are?

7 A Well, plenty. I've had to change my handle on  
8 Twitter, for instance, because I've been stalked by you.  
9 But more recently it's been Pariabo. I've used TA Mix  
10 2011. I've used my real name, Thomas Mix. I've used  
11 multitudes of Thomas Arzis that you keep tracking and  
12 stalking. So it's very hard to keep track of everything  
13 I've done. But unlike others, I don't have multiple  
14 accounts. I just keep changing my handle.

15 Q Have you ever been charged with a crime?

16 A No. Oh, yes. Charged, when I was a minor.

17 Q So you've been arrested once at least?

18 A As a minor.

19 Q Have you ever been convicted?

20 A No.

21 Q And your occupation?

22 A Unemployed.

23 Q So you don't have a place of employment then,  
24 you're not employed?

25 A That's what unemployed is, yes.

1 Q So you're claiming I caused monetary damages to  
2 your employment, but you're not employed; is that  
3 correct?

4 MR. GROOM: Object as to form.

5 BY MS. RUNYON:

6 Q All right. We'll just leave that be.

7 So how have you determined your monetary  
8 damages?

9 A How have I determined them?

10 Q Or you and your lawyer.

11 A Well, I determined them based upon the repeated  
12 harassment that you've caused, what you have been writing  
13 on numerous blogs. The way that you even posted about me  
14 this morning is quite shocking. You just keep harassing  
15 me in a really criminalizing kind of way. It's creepy  
16 and it's very offensive, and that's the reason why I had  
17 to bring this suit forward.

18 Q So, therefore, you're essentially saying your  
19 feelings are hurt, and that caused monetary damages?

20 A No. I'm saying you're purposely causing damage  
21 to my reputation. You're purposely doing it knowing that  
22 you're causing --

23 Q We'll get to your reputation momentarily.

24 A I'm just answering question. You want to know  
25 how I'm gathering monetary damages.



1 Q Well, you so far haven't explained how you've  
2 had monetary damages.

3 A Well, you keep interrupting.

4 MR. GROOM: Okay, guys. Both of you need to  
5 slow down just for our stenographer here.

6 MS. RUNYON: Alrighty.

7 MR. GROOM: It's quite a lot that you guys are  
8 both saying.

9 BY MS. RUNYON:

10 Q When did you first become aware of Defendant,  
11 me, Jeanette Runyon?

12 A 2013.

13 Q Was that the result of what exactly?

14 A Kaitlyn Hunt case I believe, yeah.

15 Q All right. Did I ever post that you are a  
16 pedophile? Excuse me, did Jeanette Runyon, the  
17 Defendant, ever posted you are a pedophile?

18 A Yeah.

19 Q Where was that statement made?

20 A Twitter.

21 MS. RUNYON: Now, I have what you did is the  
22 documentation here. Would you like to label this, I  
23 don't know, 1.

24 (Exhibit Number 1 was marked for  
25 identification.)

1 BY MS. RUNYON:

2 Q Let me describe this document. It's a  
3 headshot of you. And it says on the headshot, "Doesn't  
4 see anything wrong with adults having sex with underage  
5 minors. This person supports Free Kate." Now, does it  
6 say "pedophile" anywhere there?

7 A That's your defense. That's not what I have  
8 that I'm going to be using.

9 Q This is what you gave me.

10 (Exhibit Number 2 was marked for  
11 identification.)

12 THE WITNESS: Is that what we gave her?

13 MR. GROOM: I'm not sure offhand.

14 THE WITNESS: I don't know.

15 MS. RUNYON: This is from the documents.

16 MR. GROOM: We've provided a lot of documents.

17 THE WITNESS: Yeah. Just to pull that one  
18 tweet out of many doesn't really do much.

19 BY MS. RUNYON:

20 Q You have to show me you have failed -- this is  
21 just a statement. I have all your documents. There  
22 isn't a single one that says "pedophile" on it.

23 MR. GROOM: You don't have the answer because  
24 it wasn't a question.

25 BY MS. RUNYON:

1 Q That's right. It's just a statement.

2 This is the original tweet. You can see who it  
3 is it by.

4 A Some very weird individuals that were around  
5 you, but you were the first one to post the picture.

6 Q No, I was not. As a matter of fact, I was not.  
7 It is still available. I pulled that down two days ago.

8 A I'm sure you did.

9 Q It's by somebody called Brandon Morales.

10 A Oh, is that his name? Oh, fantastic.

11 Q That's fine.

12 A Brandon Morales? Because I believe he was  
13 connected to you on Facebook.

14 Q I have no idea who that man is actually. The  
15 tweet has remained. Have you made any effort to remove  
16 this tweet?

17 A Oh, yes.

18 Q I did not tweet this. Mr. Brandon Morales  
19 tweeted it.

20 A Okay.

21 Q Now, the date on here, would you care to read  
22 the date?

23 A The date that is on this printed document for  
24 this particular tweet says 3:40 p.m., 30th of June 2013.

25 MR. GROOM: Can we have that document marked?

1 THE WITNESS: Please.

2 MS. RUNYON: Oh, yes. I'm sorry, You're right,  
3 correct. That needs to be marked as well.

4 (Exhibit Number 3 was marked for  
5 identification.)

6 MR. GROOM: Was that marked as Defendant's  
7 Exhibit 3?

8 MS. RUNYON: Here's Exhibit 4.

9 (Exhibit Number 4 was marked for  
10 identification.)

11 BY MS. RUNYON:

12 Q This is your retweet of the same document. Is  
13 that your name? Please read it.

14 A How is this, how could you prove that this is a  
15 retweet of me?

16 Q From a document called Twicsy.

17 A What is that?

18 Q That copies all of your posts, mostly JPEGs  
19 from Twitter.

20 A So is this from Twitter or not from Twitter?

21 Q It's from Twitter. It's a copy from Twitter.

22 A Is this from Twitter?

23 Q No. It's from Twicsy. It's a copy what's from  
24 Twitter.

25 A I'm going to say, no. Because if you don't

1 have it from Twitter, I'm not going to acknowledge if  
2 that is mine or not because I don't know.

3 Q It says, "Thomas Mix." I'm going to read right  
4 there.

5 A It may, but I don't know.

6 Q It's your name that you had admitted to?

7 A Well, of course, I admitted to my name, but I'm  
8 not admitting to that document from Twicsy or whatever  
9 it's called.

10 Q Twicsy is an API that copies everything from  
11 Twitter.

12 A Well, that's dandy, but it's not from Twitter.  
13 I can't confirm it.

14 Q It is from Twitter. It's a copy of Twitter.

15 A Can't confirm. If you could find it on  
16 Twitter, I'd be happy to confirm or deny it.

17 Q Okay. So you're saying I also said you  
18 supported -- that you claim that I said that you -- did  
19 you say the Defendant Jeanette Runyon posted that you  
20 supported pedophilia?

21 A That Jeanette Runyon stated that I supported  
22 pedophilia?

23 Q Yes.

24 A Yes.

25 Q When was this statement made?

1 A My goodness, numerous times.

2 Q But do you have any evidence? Do you have  
3 evidence to that?

4 A Yeah, I have evidence. I'm sorry, apologize to  
5 you. I don't have all the dates. I've been trying not  
6 to obsess about you.

7 Q Alrighty. So once, again -- okay. Now, on  
8 this document here, Number 2, on this 2 it says right  
9 here you support Free Kate. That's Kaitlyn Hunt. Let me  
10 see. I'm running down here. Okay. So you haven't made  
11 any effort to have that removed at all?

12 A I have made an effort to have everything  
13 removed. I'm sorry, I would like to know how you would  
14 know how I would not have that removed? How would you  
15 know if I attempted not to have that remove?

16 Q Because you tend to talk about everything you  
17 do.

18 A Well, not everything, obviously.

19 Q Maybe not everything, but you tend to brag  
20 about your lawsuits.

21 Alrighty. So this is viewable on Twicsy. You  
22 haven't made any effort to have that removed or it's  
23 still up there. This meme was also reposted by somebody  
24 who call themselves US Conservative. It's still on  
25 Twitter. All of these are still publicly available.

1 Have you made any effort to have that removed?

2 A I don't know. Do you have it presently here so  
3 I can view it?

4 MS. RUNYON: Let me check and see if I have it  
5 in my documents. Yes. Here's a retweet, document.  
6 Would you label that, please.

7 (Exhibit Number 5 was marked for  
8 identification.)

9 THE WITNESS: Yeah. It looks like just more  
10 harassment of me is what this looks like. It  
11 doesn't look like -- I don't see a picture of any  
12 kind, do you?

13 BY MS. RUNYON:

14 Q Well, it's a copy of a retweet.

15 A But it doesn't have any information on it. I  
16 can't confirm or deny what that is.

17 Q Now, as we said before, the dates on these  
18 documents are the 30th of June 2013. Are you aware of  
19 statute of limitations?

20 A I am.

21 Q Do you have any documents that are within the  
22 last two years proceeding your lawsuit?

23 A Yeah, this morning and throughout the entire  
24 lawsuit.

25 Q We're talking about defamation.

1 A I am indeed.

2 Q I'm not going to get into that now.

3 So you are a supporter of Kaitlyn Hunt?

4 A In a definite support, no, I'm not a supporter  
5 of her.

6 Q Alrighty now. Just for the Kaitlyn, it was an  
7 adult high school senior who had sex with an underage  
8 minor also in her high school. Just want to make sure  
9 about that.

10 Did you belong to both of Kaitlyn Hunt's  
11 support groups?

12 A Sure did.

13 Q Did you write a blog about Kaitlyn Hunt under  
14 your, how do you pronounce, Periabo?

15 A I wrote a -- I believe the one you're referring  
16 to is the Tumblr where I was trying to defend myself --

17 Q No.

18 A -- against you for Matthew Ross, Robert Stacy  
19 McCain.

20 Q No. I'm talking about a specific blog that you  
21 wrote about Kaitlyn Hunt.

22 A Oh, could you provide it?

23 Q Yes.

24 A Because I probably do not remember.

25 Q Yes.



1 A How do you define a blog?

2 MS. RUNYON: Using a blogger software, just an  
3 article as opposed to a newspaper. It's just a  
4 private.

5 Hang on for a second. Here we go. And you  
6 want to mark that, please.

7 (Exhibit Number 6 was marked for  
8 identification.)

9 BY MS. RUNYON:

10 Q Did you put on that blog parents of the  
11 14-year-old victim was bigoted, disgusting people who use  
12 the laws to express their hatred and rage?

13 A Taken out of context the way that you described  
14 it, but, yes, I did use those words as you have them  
15 highlighted.

16 Q Now, would you be surprised to find out that I,  
17 Jeanette Runyon, actually corrected people who called you  
18 a pedophile?

19 A That would be surprising to me since you  
20 retweeted that I was a pedophile enthusiast.

21 MS. RUNYON: Actually, that's incorrect. I  
22 retweeted that you are a statutory rape enthusiast.

23 This needs to be marked, please.

24 (Exhibit Number 7 was marked for  
25 identification.)

1 MS. RUNYON: Thank you very much.

2 THE WITNESS: Am I supposed to be looking at  
3 that?

4 BY MS. RUNYON:

5 Q If you want.

6 A What is this supposed to be? Oh, sarcasm.

7 Q All right. Let me get my Free Kate stuff.

8 Online there were -- so your first encounter with  
9 Jeanette, myself, Defendant, was involving the Free Kate  
10 case?

11 A On Twitter, that is correct.

12 Q Did you accuse people who supported the rule of  
13 law of being homophobes?

14 A No.

15 Q Let's see. I actually have a screenshot of you  
16 of actually calling people homophobes. Unfortunately --  
17 here we go. Mark that. It's very hard to read,  
18 unfortunately. It's by somebody calling themselves  
19 Fabulist Hunter. I don't know who that is. It says, I'm  
20 talking about your lack of defense for Free Kate  
21 behavior. And one of the things, called them homophobes.

22 A I'm sorry, you said you didn't know who  
23 Fabulist Hunter was?

24 Q No idea who that is.

25 A But you said in your deposition you knew it was

1 Renae Drotar.

2 Q No, I did not.

3 A Yes, you did.

4 Q Did I?

5 A We can go back to that.

6 Q That's the same person? I'm not going to argue  
7 with you.

8 This is three, what, almost four years ago? I  
9 don't remember.

10 A Does it have a date? I would hope so.

11 MS. RUNYON: Would you mark this.

12 (Exhibit Number 8 was marked for  
13 identification.)

14 BY MS. RUNYON:

15 Q I'm going to show a few of people's reaction to  
16 you. If you'll like, I can blow that up and make it more  
17 readable.

18 A No, I think it's quite readable.

19 Q Alrighty. Did people object to you on Twitter  
20 during the Free Kate debacle? Did they object to you  
21 posting malice slander and calling people?

22 MR. GROOM: Object to form.

23 BY MS. RUNYON:

24 Q Let me rephrase that. Did some people on  
25 Twitter object to your posts? Did some people on Twitter

1 object to your name calling?

2 A Of course. Well, I'm sure.

3 MS. RUNYON: Here's your defense of Free Kate.

4 You can mark that.

5 (Exhibit Number 9 was marked for  
6 identification.)

7 MR. GROOM: When you have her mark these, could  
8 you please say it on the record what the exhibit is.

9 MS. RUNYON: This is Exhibit 9. Thank you.

10 BY MS. RUNYON:

11 Q This is from Laura Curtis call Tamix. "I find  
12 it pretty malicious to slander people as bigots and lie  
13 about them.

14 "Your motive is irrelevant to the crime Free  
15 Kate was charged with. 14 years olds cannot legally  
16 consent." I'm not going to read all the rest.

17 Essentially, the objection was that you felt  
18 that the victim could consent to having sex with an  
19 adult.

20 A That's incorrect.

21 MR. GROOM: She didn't ask you a question. You  
22 don't have to answer.

23 BY MS. RUNYON:

24 Q Did you post about -- did you claim you were  
25 going to get the freedom information report about the

1 Free Kate Hunt case?

2 A Yes.

3 MS. RUNYON: This is Exhibit Number 10.

4 (Exhibit Number 10 was marked for

5 identification.)

6 THE WITNESS: I don't know what the point of

7 this is, but okay.

8 BY MS. RUNYON:

9 Q It shows that you, in fact, are a Free Kate  
10 supporter. Let's put these in some kind of order here.  
11 Did somebody on the Free Kate support group complain  
12 about you?

13 A Not that I'm aware.

14 MS. RUNYON: This is Exhibit 11.

15 (Exhibit Number 11 was marked for

16 identification.)

17 BY MS. RUNYON:

18 Q Somebody named Aveline Carter. "There seems to  
19 be one guy on Tweeter, T-A-M-I-X 2011, who does nothing  
20 but smear an insult people who don't agree with him.  
21 He's a supporter like us, but he's making all of us look  
22 bad. He had nothing intelligent or constructive to  
23 encounter what people are saying about Kate. I hope we  
24 can learn to speak with intelligence and kindness and  
25 grace."

1 A What is this? This is from Twitter?

2 MR. GROOM: There's no question asked, so you  
3 don't have to --

4 BY MS. RUNYON:

5 Q So you're not aware that somebody complained  
6 about your behavior on Twitter from the support group?

7 A For my stalkers. That's irrelevant to me.

8 Q That's not a stalker.

9 A I don't know what that is. That's from  
10 Twitter, not from Facebook.

11 Q Did you say that you made a claim that Jeanette  
12 Runyon, the Defendant, had nothing to do with Free Kate  
13 except being a criminal harasser?

14 A That you had nothing to do with it?

15 Q Yes. Nothing to do with Free Kate, nothing  
16 except being a criminal harasser.

17 A Possibly at the beginning.

18 MS. RUNYON: This is Exhibit 12.

19 (Exhibit Number 12 was marked for  
20 identification.)

21 BY MS. RUNYON:

22 Q I'll just give you some examples. Alrighty.  
23 On Kate's journey, that's a secondary Free Kate Facebook,  
24 you're showing here that you got suspended for your  
25 support of Free Kate from Twitter.

1 A I'd have to review that before I can answer.

2 MS. RUNYON: This would be Exhibit 13.

3 (Exhibit Number 13 was marked for

4 identification.)

5 THE WITNESS: What did you say this was in  
6 regards to again?

7 BY MS. RUNYON:

8 Q That you are a supporter of Free Kate.

9 A I thought you said that I was suspended.

10 MR. GROOM: There's no question asked, so you  
11 don't have to answer.

12 BY MS. RUNYON:

13 Q Let's get down here. Did you discuss the  
14 Defendant on Kaitlyn Hunt support group?

15 A You, yes.

16 MS. RUNYON: Here we are. This is Exhibit 14.

17 (Exhibit Number 14 was marked for  
18 identification.)

19 BY MS. RUNYON:

20 Q The reason I'm showing this is you claim --  
21 this is a statement -- you claim that you are being  
22 harassed. But there's numerous people saying, in fact,  
23 you are the harasser. That's the point. You insulted  
24 people. Did you insult people on Twitter who supported  
25 Free Kate?

1 A Yes.

2 MS. RUNYON: Exhibit 15.

3 (Exhibit Number 15 was marked for  
4 identification.)

5 BY MS. RUNYON:

6 Q Did you claim that people who supported who  
7 considered Kaitlyn Hunt a sexual predator who hated gays?

8 A Yes.

9 MS. RUNYON: We have Exhibit 16.

10 (Exhibit Number 16 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q Did you claim that Defendant Jeanette Runyon  
14 posted that you're a pedophile along with your home  
15 address?

16 A Along with my home address?

17 Q Yes. That's what your original suit says.

18 MR. GROOM: Once again, I can't testify. I'm  
19 an attorney.

20 THE WITNESS: I'm going go ahead and say, no.

21 BY MS. RUNYON:

22 Q Did you claim Jeanette Runyon made derogatory  
23 statements specifically about your sexual orientation?

24 A Yes.

25 Q Where and when?



1 A On Twitter?

2 Q Yes. I need a date. You don't have any  
3 documentation, because you've provided me with none.

4 A No, ma'am. You get that through them, not  
5 through me.

6 Q You provided to them.

7 A I know.

8 Q I have so far -- I can't show you the disagreed  
9 because you gave me none. And the documentation, there's  
10 not a single documentation that says any derogatory  
11 statements.

12 A That's your opinion.

13 Q So you have no supporting statement, no  
14 supporting documentation. And do you understand the  
15 difference between having an opinion about certain  
16 behaviors or about marriage is not a personal insult?

17 A I disagree.

18 Q You may disagree, but it's an opinion.

19 A I disagree when it's done repeatedly over and  
20 over and over and over again to cause distress.

21 Q An opinion causes distress?

22 A When it's repeated over and over and over again  
23 with the intention to inflict emotional distress.

24 Q Did Defendant Jeanette Runyon post that you  
25 supported pedophilia because of your sexual orientation?

1 A Yes.

2 Q Can you provide documentation?

3 A I can.

4 Q Have you done so? I have no documentation.

5 A Well, all the documentations have been  
6 provided.

7 Q No, it has not.

8 A It has.

9 Q I can pull it up on the web. It's not there.

10 A I didn't have to because I already had it  
11 printed out. It's already here. You have it. You just  
12 probably don't know what to look for.

13 Q I do not have it.

14 Have I threatened your personal safety?

15 A You have.

16 Q How have I threatened your personal safety?

17 A By posting my home address, by stalking my  
18 sister and my family. You've also endangered my elderly  
19 father.

20 Q So have I actually threatened imminent violence  
21 to you?

22 A No.

23 Q So have I threatened any imminent lawless  
24 action towards you?

25 A Well, hacking.

1 Q You have proof of that?

2 A I do.

3 Q Hacking you?

4 A Yeah. Hacking people that -- yeah.

5 Q No, that's not my question. My question is,  
6 have I hacked you?

7 A Yes. I'm going to go ahead and provide that  
8 documentation for you, ma'am. You obviously need a  
9 refresher.

10 Q Okay. And I did ever post your sister's  
11 address?

12 A Yes.

13 MS. RUNYON: I did, huh? All right. Here's a  
14 single, only post about your sister. Mark this  
15 Exhibit Number 17, please.

16 (Exhibit Number 17 was marked for  
17 identification.)

18 THE WITNESS: See how she pick purposely picked  
19 out the thumbnail.

20 BY MS. RUNYON:

21 Q Picked out the what?

22 A The thumbnail. You purposely picked out the  
23 thumbnail of my sister.

24 Q Where is your sister's address?

25 A My sister's address is my home address at the

1 time when you posted it.

2 Q Where is the address on there? Can you show  
3 me?

4 A Oh, honey.

5 Q Don't, please. I'm asking a question. Where  
6 is the address on that document?

7 A Not on that document.

8 Q That's the only document available.

9 A Oh, honey.

10 Q Okay. No honey me. Where is your sister's  
11 address?

12 A She lived at my address at the time you posted  
13 my address.

14 Q Is your sister's name mentioned here? I'm not  
15 done with you. Is your sister's name mentioned?

16 A In the deposition, yes.

17 Q No, no, no. On this document is your sister's  
18 name mentioned?

19 A Don't raise your voice, please.

20 Q Answer the question.

21 A I'm not raising my voice with you.

22 Q Answer the question.

23 A Don't raise your voice with me.

24 Q Please answer the question.

25 A No, it doesn't appear that you've used my

1 sister's name. You did, however, use her thumbnail.

2 Q Is your name on that document right there?  
3 Because it's the only post about your sister.

4 A Is appears not.

5 THE WITNESS: Oh, David. Can you write that  
6 name down?

7 BY MS. RUNYON:

8 Q Now, I'm going to make this clear. Your name  
9 is not mentioned on that document?

10 A Correct.

11 Q Your sister's name is not mentioned on that  
12 document?

13 A Her picture is, correct.

14 Q And her address or your address is not  
15 mentioned on that document?

16 A On that particular document, correct.

17 Q Are there any other documents where I've  
18 mentioned your sister's name?

19 A Not that I'm aware of.

20 Q Alrighty. And the date on that document?

21 A It says December 24th of 2013.

22 Q Once again, past the statute of limitations.

23 So you're claiming monetary damages because I  
24 posted a newspaper article about your sister winning a  
25 body building contest?

1           A    During the harassment that you were  
2           perpetrating upon me, yeah.  It's kind of weird.

3           Q    Has your sister complained?

4           A    Yeah, to me.

5           Q    To you.  But she's not complained to me?

6           A    Oh, she'll be in court.  Don't worry.

7           Q    Your sister no longer lives with you, does she?

8           A    No longer, no.

9           Q    So you're trying to sue -- if your sister --  
10          let me explain something to you.

11          A    No, you don't need to explain stuff to me.

12          Q    Your sister is a third party.  This is past the  
13          statute of limitations.

14                 Alrighty.  So I posted your home address.  
15          Okay.  Where did that happen?

16          A    Twitter.

17          Q    The date approximately?

18          A    Approximately, my, God.  You had to do it after  
19          Renaë did it, because she's the first one that posted the  
20          My Life that you reposted on your regular Jeanette at  
21          Jeanette Runyon, before that was suspended out of your  
22          many Twitter accounts that were suspended.  So I would  
23          have to say probably, if I was to approximate a date for  
24          you, I'd have to say near the end of 2013, beginning of  
25          2014.

1 MS. RUNYON: Exactly, 2013. Past the statute  
2 of limitations. Let me get this. Please mark this  
3 number Exhibit 18.

4 (Exhibit Number 18 was marked for  
5 identification.)

6 BY MS. RUNYON:

7 Q This is from your Twitter account. It says, "I  
8 notified law enforcement the minute Renae posted my  
9 address." Is that correct?

10 A Yes.

11 Q You posted that?

12 A Yes.

13 MS. RUNYON: We have Document 19.

14 (Exhibit Number 19 was marked for  
15 identification.)

16 BY MS. RUNYON:

17 Q You posted that Defendant Jeanette Runyon doxed  
18 you through Renae. You said that Defendant was Renae's  
19 proxy soldier.

20 A Possibly.

21 Q This is Exhibit 19. It's your post.

22 A Oh. Well --

23 MR. GROOM: There's no question asked. You  
24 don't have to answer.

25 THE WITNESS: She's misspeaking, though.

1 BY MS. RUNYON:

2 Q Do you have any document, do you have any  
3 evidence to support your claim that I'm Renae's proxy  
4 soldier?

5 A If I may, if I may read Exhibit 19. The tweet  
6 says, to Nicole Bonnet. "Well, that wasn't necessary  
7 because hashtag Jeanette Runyon already doxed me through  
8 another proxy soldier." I'm not claiming you were a  
9 proxy soldier. I said through another proxy soldier.

10 Q She's my proxy soldier?

11 A It depends on your -- it's your interpretation  
12 of how you're reading it.

13 Q Okay. Are you aware that public addresses are  
14 a matter of public record?

15 A I am.

16 Q Is your address found on a web search?

17 A Yeah, unfortunately.

18 Q Do you have an opinion piece written in TC Palm  
19 which states why you live in Vero Beach?

20 A I do.

21 MS. RUNYON: This is Exhibit 20.

22 (Exhibit Number 20 was marked for  
23 identification.)

24 BY MS. RUNYON:

25 Q This is for you. Take a peek at it.



1           A    No need. I remember that letter well. It's  
2 the only one I wrote to Bill Posey.

3           Q    All right. Were you ever on a local news and  
4 stated that you lived in Vero Beach?

5           A    Yeah, I was on the news. I like your smile  
6 there, because you like you like my taking picture from  
7 it. Creepy.

8           Q    Actually, I didn't do that. Somebody else did.  
9 I don't get Vero Beach news.

10          A    You definitely got that minutes.

11          Q    Did you tweet that you lived in Vero Beach?

12          A    Probably, yes.

13                MS. RUNYON: We have Exhibit 21.

14                (Exhibit Number 21 was marked for  
15 identification.)

16                BY MS. RUNYON:

17           Q    Do you have a Foursquare account that says you  
18 live in Vero Beach?

19           A    Yeah, I do. I thought I deleted that, though.

20                MS. RUNYON: Exhibit 22.

21                (Exhibit Number 22 was marked for  
22 identification.)

23                BY MS. RUNYON:

24           Q    Have you tweeted that public records are okay  
25 for public posting?

1 A Not sure.

2 MS. RUNYON: Exhibit 23. This is a post you  
3 made on Twitter.

4 (Exhibit Number 23 was marked for  
5 identification.)

6 BY MS. RUNYON:

7 Q Read it here. "LOL public docks not violation,  
8 Stupid."

9 MR. GROOM: No question.

10 MS. RUNYON: No, it's just --

11 MR. GROOM: No question was asked.

12 BY MS. RUNYON:

13 Q Did you tweet, now that I refreshed your  
14 memory, that public records are okay for public posting?

15 A That is apparently correct, yes.

16 Q Did you tweet that it's legitimate to post the  
17 names and addresses and people's places of employment?

18 A Can you repeat that?

19 Q Did you tweet that it's legitimate to post the  
20 names and home addresses as well as where people are  
21 employed?

22 A Are you referring to the Every Trump Voter?

23 Q Yes.

24 A Okay.

25 MS. RUNYON: Exhibit 24.

1  
2 (Exhibit Number 24 was marked for  
3 identification.)

4 BY MS. RUNYON:

5 Q Would you please read what you tweeted.

6 A "Actually your donation to Trump is a public  
7 record for public posting. Enjoy retard." That is due  
8 to every Trump donor, which is using public FEC, which is  
9 not a creation of mine mind you, that reposts the name,  
10 not the address but the city, and the dollar amount they  
11 donated to Donald Trump per FEC regulations.

12 Q Actually, it also posts their address.

13 A Well, they don't post the home address on that  
14 Twitter account.

15 Q They do. They tell us where they work as well.

16 A They say where you work? A lot of people put  
17 retired too.

18 Q Did you post on your Facebook account that  
19 everybody who donated to Donald Trump, the world will  
20 know who you are?

21 A Yeah. Through every Trump voter.

22 MS. RUNYON: So, apparently -- rephrase that.  
23 I'm might catch myself. I'm going to stop. That's  
24 25, please. Mark that 25.

25 (Exhibit Number 25 was marked for

1 identification.)

2 BY MS. RUNYON:

3 Q And did you tweet the names, a screenshot of  
4 the names of the Florida Electoral College with the  
5 words, this is a public document, you cunt?

6 A Yeah.

7 MS. RUNYON: This is Exhibit 26.

8 (Exhibit Number 26 was marked for  
9 identification.)

10 BY MS. RUNYON:

11 Q So you're okay with some public documents being  
12 tweeted or posted?

13 A I'm sorry, is that a question directed at me?

14 Q Are you okay with public documents being --

15 A Lower your voice, please.

16 Q Sorry.

17 A If you're going to yell at me and stuff and be  
18 hostile -- look, I've already dealt with you for three  
19 years harassing me. I don't want you yelling at me at my  
20 face. Now, what your question, ma'am?

21 Q So you have posted publicly that you are okay  
22 with sharing public documents?

23 A I'm okay with sharing public documents like  
24 this, not publications when I was a minor. Trying to  
25 pass it off that I was criminal.

1 Q I'm not speaking about that. We're speaking  
2 about addresses.

3 A You're speaking about addresses or were you  
4 speaking --

5 Q Home addresses.

6 A Home addresses. Where are the home addresses  
7 on there, ma'am?

8 Q This is your --

9 A You're going all over the place. I don't know  
10 exactly where you're going.

11 Q Going on public documents you're perfectly fine  
12 with being posted. You have said so, posted numerous  
13 times.

14 Now, did Defendant Jeanette Runyon post your  
15 sealed juvenile records?

16 A Apparently, it wasn't sealed. But you  
17 definitely used it to harass me online.

18 Q Once. So you know that these are -- so then  
19 you understand -- this is not a question. This is  
20 rhetorical. Juvenile records are not available to the  
21 general public?

22 A Yeah. That should be the key, yeah.

23 Q Have you ever had an order of protection filed  
24 against you?

25 A Oh, man. I was 16.

1 Q Yes.

2 A I would have to refer that document because I  
3 don't remember. I was 16.

4 Q You are aware that that's a public document?

5 A Yeah. I apparently learned that the hard way.

6 Q You're aware that the application can be easily  
7 found as of two days ago on Indian River's Court page?

8 A Yeah. Actually, I found out when you sent the  
9 information. I went and looked at that web page, and I  
10 was quite disturbed that it was actually up there.

11 Q You're aware that that's your mother's  
12 document, not yours?

13 A I'm aware whose document it is.

14 Q Did you publicly admit to having sealed  
15 juvenile records on social media?

16 A That is correct, because I believe it should  
17 have been sealed.

18 Q Did you say that Stacy McCain posted your  
19 public records?

20 A Oh, he did. Yeah, when he went ahead and --  
21 when you posted them on there.

22 MS. RUNYON: All right. This is 27.

23 (Exhibit Number 27 was marked for  
24 identification.)

25 BY MS. RUNYON:

1 Q Now, do you claim that Defendant Jeanette  
2 Runyon ever called you a criminal?

3 A Yes.

4 Q And where did Defendant do that?

5 A Facebook.

6 Q Facebook. I never saw a copy of that.

7 A Twitter.

8 MS. RUNYON: This is the only document where  
9 your mother's application for protective order,  
10 which was denied, was posted ever, anywhere on by  
11 me.

12 This Exhibit 28.

13 (Exhibit Number 28 was marked for  
14 identification.)

15 And this is Exhibit 29.

16 (Exhibit Number 29 was marked for  
17 identification.)

18 BY MS. RUNYON:

19 Q Exhibit 29, this is a from a Stacy McCain's  
20 blog. This is way back in the comment section, so you  
21 have to flip back and see it. I'm not sure where it is  
22 actually. There is it.

23 A Matthew Ross.

24 Q All right. This is a large size. This is  
25 Exhibit 28.

1 A Give me just a moment.

2 Q Sure, no problem. This is the large so you can  
3 get a better view. Does it say, on Exhibit 28 does it  
4 say anywhere that you're a criminal?

5 A Your wording is funny. But, no, not directly.

6 Q This is the only document that I've posted with  
7 that.

8 A That was on Twitter again?

9 Q No. That was on Disqus.

10 A Oh. That was on the Disqus there.

11 Q And the date?

12 A Wait a minute. That was on Disqus? May I see  
13 it again?

14 Q It was on Disqus.

15 A May I see the other? Yes, thank you.

16 Q Please read the date on the top. This is  
17 Exhibit Stacy McCain on the top.

18 A Right there. Thank you.

19 Q Please read the date.

20 A I'm coming to look at something else, so hold  
21 on just a moment. You are correct, no mention of  
22 criminal.

23 Q And the date, please.

24 A I believe it says December 30, 2013.

25 Q Past the statute of limitations. I don't need



1 to deal with this.

2 Now, I got my questions here. Now, try not to  
3 laugh here. How is calling you a special teacup harmed  
4 you?

5 A You're going to try not to laugh. Because you  
6 use it in every derogatory form to insult me and harass  
7 me, up to and including two days ago. You even used it  
8 then.

9 Q Well, it's become a hashtag now.

10 A You're using it since it became a hashtag.

11 Q Yeah, I know that. Now, how exactly have you  
12 been harmed by being called a special teacup?

13 A Because I've been harassed by you for three  
14 years.

15 Q No, you need to be specific.

16 A I am being specific. How more specific can I  
17 be? You post about me constantly. You write about me  
18 all the time. My special little teacup, waving at my  
19 little teacup, doing all this crazy stuff. You're weird.

20 Q So your income has been affected by being  
21 referred to as special little teacup?

22 A No. My income has been affected by what you've  
23 caused in the blogs that you've had written about me.

24 Q Caused, okay. Do you know what the definition  
25 of stalking is?

1           A    Yeah. Do you know the definition of  
2 cyberstalking? That's actually a more important term,  
3 because that's what's this is.

4           Q    That's not my question here.

5           A    Well, you're asking me a direct question.

6           Q    The Florida law defines stalking as repeated  
7 harassment that creates credible threats of harm.

8           A    What is cyber harassing? Because that's what  
9 this is.

10          Q    Have I ever emailed you?

11          A    This is classified under cyber harassment, not  
12 regular stalking. Cyberstalking, cyber harassing.

13          Q    Have I ever met you before today?

14          A    No.

15          Q    I've never called you?

16          A    No.

17          Q    I've never emailed you?

18          A    No.

19          Q    I've never IM'd you?

20          A    No.

21          Q    So therefore, I have never made a contact  
22 directly to you?

23          A    No.

24          Q    Have you ever called the Defendant a  
25 professional stalker?

1 A Yes.

2 Q Of course, you have documentation that I'm a  
3 professional stalker?

4 A Yeah. Your posts constantly and up to this  
5 morning.

6 Q Stalker is a crime, a criminal --

7 A Well, we can debate that in trial.

8 Q Do you have like real documentation as in being  
9 arrested for stalking, convicted?

10 A You?

11 Q Yes.

12 A No.

13 Q So you have no documentation I've been arrested  
14 for stalking. Do you have any documentations I've ever  
15 been convicted for stalking?

16 A No.

17 Q All right. What is your definition of a  
18 professional stalker?

19 A Wall, a professional stalker, in my opinion,  
20 when I was referring it to you, was based upon the way  
21 that you habitually write about me, follow my timeline,  
22 copy my posts, post it on numerous blogs like R.S. McCain  
23 or Barbwire dot com or the Conservative Hideout dot com,  
24 and how you just constantly repeating and repeating and  
25 harassing and harassing on a daily basis for no intents

1 or purposes. Especially lately during this entire  
2 lawsuit how you've been writing, just retweeted my  
3 political tweets saying "special little teacup" here and  
4 there. It's just, I don't understand what your obsession  
5 is with me.

6 MS. RUNYON: All right. This is Exhibit 30.

7 (Exhibit Number 30 was marked for  
8 identification.)

9 BY MS. RUNYON:

10 Q Please read your post.

11 A Uh-huh. "Denny Smith 45, Ptapup 1, Nicole  
12 Bonnet 1, Conch Gunny. She's a criminal and professional  
13 stalker and hashtag R.S. McCain seems to be complicit in  
14 this too," who is Robert Stacy McCain.

15 Q Have you ever posted that I was stalking, or  
16 the Defendant was stalking you in real life?

17 A Well, yeah the Internet is real life.

18 MS. RUNYON: I'm going to use this as evidence.

19 This is 31.

20 (Exhibit Number 31 was marked for  
21 identification.)

22 BY MS. RUNYON:

23 Q Are you forced to read my public posts?

24 A Am I forced to read your public posts?

25 Q Yes. Because you apparently read them.

1           A    No, I don't read them. I've actually given  
2   them.

3           Q    Do you actively search for my public posts?

4           A    Not anymore.

5           Q    Now?

6           A    I had to at the beginning of the lawsuit, of  
7   course. I just want to make that clear and on the record  
8   that, yes, at the beginning of this lawsuit, yes, I did  
9   have to search for stuff you wrote about me.

10          Q    Defendant Jeanette Runyon -- I have a Gab  
11   account. It's marked private, which means nobody should  
12   be able to read it except those who follow me and my  
13   friends. There's about few hundred. Not very many. It  
14   also cannot be searched through Google and it cannot be  
15   searched on Gab, yet you have every single Gab post I  
16   make.

17          A    I know.

18          Q    You are, in fact, going out and looking for my  
19   posts?

20          A    I am not.

21          Q    You have. Excuse me. Never mind.

22                You have a proxy. You have a soldier here --  
23   this would be Exhibit 32 -- who has apparently made  
24   friends with me. I don't really care. Has made friends  
25   with me to pass along my posts that are not public to

1 you.

2 A About me.

3 MR. GROOM: No question was asked.

4 BY MS. RUNYON:

5 Q So is Nicole Bonnet sending you copies of my  
6 posts?

7 A She is.

8 Q You understand that these posts are not public?

9 A They are actually.

10 Q Well, in sense that you can't find them on  
11 Google. Not the Gab posts.

12 A Probably not. Probably not. I'm not sure. I  
13 didn't try to search for your Gab account on Google, so I  
14 don't know.

15 MS. RUNYON: This is information, you cannot  
16 find this anywhere unless you're my friend. You  
17 can't even search for it on Gab. It's completely  
18 private. More or less private considering it's on  
19 the Internet.

20 Let's mark this 32.

21 (Exhibit Number 32 was marked for  
22 identification.)

23 BY MS. RUNYON:

24 Q So do you believe mentioning your name in  
25 context with your public posts is causing you harm?

1 A In the context of how you've done it, yes.

2 Q Do you believe -- have I ever mentioned posts  
3 and actually suggested some harm come to you?

4 A Very fine line.

5 Q So you believe mentioning your name in context  
6 with your public posts is a threat?

7 A I do. How much you do it and how much you  
8 repeatedly do it.

9 Q Do you understand the difference between  
10 posting about somebody and posting to somebody?

11 A I understand the difference between obsessing  
12 over somebody and then reporting and writing a blog about  
13 somebody.

14 Q We'll get to that in a bit.

15 Now, do you believe that liking the Vero Beach  
16 Facebook page is stalking you?

17 A At the time that I was told you did that, I  
18 thought it was very weird, yeah. I said that. I thought  
19 it was kind of weird to like the page of my city. Yeah,  
20 it was weird.

21 Q Especially since I didn't do it.

22 A I think that you did that after the whole North  
23 Carolina KKK thing.

24 MS. RUNYON: Actually, I've never liked that  
25 page. That's a lie.

1           33, please.

2           (Exhibit Number 33 was marked for  
3 identification.)

4           Q   Here you go. You can take a peek at it. So  
5 are you claiming injury because you thought I liked the  
6 Vero Beach Facebook page?

7           A   No. I'm claiming injury based upon how much  
8 you harass and stalk me online and how much emotional  
9 distress you're causing.

10          Q   Do you understand about the First Amendment -  
11 Freedom of Speech?

12          A   I understand about Freedom of Speech.

13          Q   You posted about the Kaitlyn Hunt case,  
14 correct?

15          A   Yes.

16          Q   And you've posted about elected officials?

17          A   Correct.

18          Q   And you've posted about current politics?

19          A   Correct.

20          Q   And all of these matters are public concern,  
21 are they not?

22          A   Public concern?

23          Q   People are interested in these public --

24          A   I'm interested in what I say, yeah.

25          Q   Are you familiar with Twitter's terms of



1 service?

2 A Yeah, I am.

3 Q Here is it.

4 A No need. I've read it plenty of times.

5 MS. RUNYON: Well, we'll just put it in here,  
6 and you can find it if you want to. Exhibit 34.

7 (Exhibit Number 34 was marked for  
8 identification.)

9 BY MS. RUNYON:

10 Q I'm going to read to you just one point. It  
11 reads, "By submitting, posting, or displaying content on  
12 or through services, you grant us," us being Twitter,  
13 "worldwide, nonexclusive royalty-free license to, use,  
14 copy, reproduce, process, adapt, modify, publish,  
15 transmit, display, and distribute such content in any all  
16 media distribution methods." You allow, according to  
17 this, to let others do the same.

18 A Does it explicitly say that?

19 Q Yes, it explicitly says that. You agree to  
20 authorize Twitter to make your tweets available to the  
21 rest of the world and to let others do exactly the same.

22 A Probably, yeah. Most likely. They are public.

23 Q You are aware that anything you post on Twitter  
24 is a public conversation, okay?

25 A More like a public statement.

1 Q It's like putting a billboard up.

2 MR. GROOM: No question.

3 BY MS. RUNYON:

4 Q It's no question. You're aware that once you  
5 post on Twitter, it can be read anywhere, anywhere in the  
6 world, and you don't need a Twitter account.

7 A Yeah.

8 Q So your goal is to stop Jeanette Runyon from  
9 exercising her free speech rights. Is your goal to stop  
10 Jeanette Runyon from exercising her free speech rights?

11 A No.

12 Q It is not?

13 A No, it is not. I'm trying to stop you from  
14 harassing and stalking me. You can talk about other  
15 people if you want who can sue you later, but I want you  
16 to stop bothering me.

17 Q So do you agree that contacting a person's  
18 place of employment, local law enforcement, family  
19 groups, family in a person's community would be  
20 considered stalking, would it not?

21 A Yeah, if it occurred.

22 MS. RUNYON: We have Exhibit 35.

23 (Exhibit Number 35 was marked for  
24 identification.)

25 BY MS. RUNYON:

1 Q This is you and a Twitter anonymous person,  
2 Nicole Bonnet, discussing her alleged trip to my hometown  
3 to contact people.

4 A So she's the one who did it, so you should be  
5 talking with her.

6 Q I'm not finished yet. Now, one of the things  
7 here, you can read this, you are very happy that she was  
8 doing that?

9 A Sure. Why not? You're monstrous to me. Oh,  
10 this is all the way back during Little Hart. Yeah, this  
11 is back in like 2013, 2014. I mean, yeah, you were  
12 monstrous towards me. Of course I was happy.

13 Q All right. Did you post, "Good. Her community  
14 should know what kind of person she is. Let know them  
15 know she's a photographer"?

16 A Yeah.

17 Q So you were comfortable with this person coming  
18 into my town, contacting people I know, weren't you? You  
19 were comfortable, you're okay with that?

20 A I was, you know, could care less to be quite  
21 honest. I cared about as much as you cared about me, you  
22 could say, during that time. Because you got to remember  
23 the timeframe that you're using right there was all the  
24 way at the very beginning.

25 Q We'll get to that.

1 A I just want to make sure for the record --

2 Q We'll get to that.

3 A -- we get the timeframe right.

4 MS. RUNYON: We're going to get to that.

5 Exhibit 36.

6 (Exhibit Number 36 was marked for  
7 identification.)

8 MS. RUNYON: That's 36. When you get a chance,  
9 mark this a 37.

10 (Exhibit Number 37 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q Did you tell Nicole that she should send DVDs  
14 of me stalking someone to people in my community?

15 A That's your interpretation. No.

16 Q Read it. Just read it. Please read it.

17 A Sarcastically, put it in the mail. Of course,  
18 you can't see the little side remarks that are little  
19 emojis, because she printed it out with some unknown  
20 method because it's archived. But, yeah, it's the way  
21 you interpreted, ma'am.

22 Q Did you call my local sheriff in hopes to get  
23 me arrested?

24 A I actually did call your sheriff, but not in  
25 hopes to get you arrested. In hopes to file an actual

1 complaint about your stalking.

2 Q Did you call my local D.A. in hopes of getting  
3 me arrested?

4 A I did call your local D.A. as another avenue to  
5 see which avenues I had available to me.

6 Q Did you call the local FBI in order to get me  
7 arrested?

8 A I certainly did, especially when you were  
9 asking people to hack.

10 MS. RUNYON: This would be 38 and 39.

11 (Exhibit Numbers 38 and 39 were marked for  
12 identification.)

13 BY MS. RUNYON:

14 Q Now, we get to how all this -- did you ever  
15 post Defendant Jeanette Runyon tried to smuggle a baby  
16 into the U.S.?

17 A Yes.

18 MS. RUNYON: This is 40, please.

19 (Exhibit Number 40 was marked for  
20 identification.)

21 BY MS. RUNYON:

22 Q Did you ever post that Jeanette Runyon tried to  
23 traffic an infant?

24 A Yes.

25 MS. RUNYON: That would be document 41, please.

1 (Exhibit Number 41 was marked for  
2 identification.)

3 Q Did you ever post that Jeanette Runyon tried to  
4 raise money to buy another infant from the Ukraine?

5 A Not sure.

6 MS. RUNYON: 42.

7 (Exhibit Number 42 was marked for  
8 identification.)

9 BY MS. RUNYON:

10 Q Here is the document 42. There's your post.  
11 Please read it.

12 A Oh. You have to take that out of context  
13 because it's in response to whatever you wrote on your  
14 Tabitha Martin account. So do you remember what you  
15 wrote on your Tabitha Martin?

16 Q I was raising money for a lawsuit.

17 A Yeah. That's exactly probably why I said it.

18 Q Did you ever post, "She needs money to buy  
19 another baby I'm assuming"?

20 A Probably, yes.

21 MS. RUNYON: This is 43. This is 44.

22 (Exhibit Numbers 43 and 44 were marked for  
23 identification.)

24 BY MS. RUNYON:

25 Q Did you have post to an Anonymous Anti Pedo,

1 "Take a look at this woman. She tried to smuggle a baby  
2 to the U.S."?

3 A Yep. It appears so according to this, and I  
4 linked NOManiacs blog.

5 MS. RUNYON: Exhibit 45.

6 (Exhibit Number 45 was marked for  
7 identification.)

8 BY MS. RUNYON:

9 Q Did you claim that I confessed to smuggling --  
10 to human trafficking? Excuse me. Did you claim I  
11 confessed to human trafficking?

12 A Yeah. According to the NOManiacs blog, you  
13 pleaded guilty.

14 Q To human trafficking?

15 A To passport and Social Security fraud, trying  
16 re-enter into the United States.

17 Q Do you know what a criminal complaint is?

18 A No. I'm not a lawyer.

19 Q Has your lawyer explained to you what a  
20 criminal complaint is?

21 A No. This is a civil proceeding.

22 Q Okay. Going to explain it to you. Criminal  
23 complaint is a court document that accuses somebody of  
24 committing a crime. So you do you know what indictment  
25 is?

1 A Not off the top of my head.

2 Q An indictment is a document authorizing --

3 MR. GROOM: Hold on one second. Did you want  
4 to mark that?

5 MS. RUNYON: I'm sorry. Thank you. 46.

6 (Exhibit Number 46 was marked for  
7 identification.)

8 BY MS. RUNYON:

9 Q This is a criminal complaint.

10 A That was the one posted on NOManiacs?

11 Q Right, the complaint. NOManiacs called that an  
12 indictment. It is not an indictment. An indictment is  
13 authorizing a charge. Usually you go before -- now they  
14 go through, what's the word, a jury and they ask for an  
15 indictment. It would be indictment.

16 Do you have an indictment for me that I've  
17 committed -- have I ever been indicted for human  
18 trafficking?

19 A Apparently, NOManiacs stated you were, so you  
20 would have to go ask them. They were the ones who wrote  
21 it.

22 Q Yes. But the whole thing is available on PACER  
23 public.

24 A PACER public?

25 Q So you do not have it?



1           A    That's not what you showed me. This is from  
2    NOManiacs.

3           Q    That's right. That's the only document.

4           A    And what I sent them was from NOManiacs, which  
5    you claimed in this deposition. So we're not talking  
6    about --

7           Q    So you have no indictment, you have no proof  
8    that --

9           A    Apparently, just NOManiacs.

10          Q    So do you have any documentations that I was  
11    ever convicted of human trafficking?

12          A    Apparently by that indictment.

13          Q    That's not an indictment.

14          A    Well, that's up to you. You need to get that  
15    removed then. I don't know what to tell you.

16          Q    And were you informed by several people that  
17    the Defendant Jeanette Runyon had no felony convictions?

18          A    I was told by you who we were currently  
19    skirmishing with due to the Kaitlyn Hunt. And I was also  
20    told by a bunch of other people who were writing blogs  
21    about me on behalf of you. So I don't really take their  
22    opinions very highly at all because you guys were  
23    harassing me. So why would I believe you?

24          Q    We weren't harassing you.

25          A    You were quite harassing me. That's why we're

1 here.

2 MS. RUNYON: 47 whenever you get a chance.

3 (Exhibit Number 47 was marked for  
4 identification.)

5 MS. RUNYON: This is what I was convicted of.

6 This will be 48.

7 (Exhibit Number 48 was marked for  
8 identification.)

9 BY MS. RUNYON:

10 Q Please read the yellow.

11 A I don't really care what you were convicted of  
12 here. What is that?

13 Q Let me repeat that again.

14 A "Petty/Misdemeanor Offenses."

15 Q You don't care. Did you just say you don't  
16 care?

17 A Let's see here. Pleaded guilty.

18 Q To a petty offense?

19 A That's right. You pleaded guilty, which is  
20 what I stated.

21 Going back to the comment that you were just  
22 referenced of the do not care, I said, "I do not care."

23 Q Right.

24 A You do have that tweet?

25 Q I have it here.

1 A Fantastic.

2 MS. RUNYON: 49, please.

3 (Exhibit Number 49 was marked for  
4 identification.)

5 BY MS. RUNYON:

6 Q Here's your tweet. Please read what it says.

7 The whole thing.

8 A Let's see. Replying to Gotta Laff at  
9 Republican Swine. She's mad because, I meant to say mad,  
10 because she brought to light NOManiacs. She must think I  
11 care if it's true or not.

12 Q I need to repeat that again. You do not care  
13 whether I was actually convicted of human trafficking or  
14 not?

15 A Based upon your honest opinions and the way  
16 that you are coming at me and the way that you try to  
17 resolve it yourself by you telling me, you and the people  
18 who are also talking me were telling me, you guys, no. I  
19 wouldn't leave anything --

20 Q Did you post numerous times over several years  
21 that Defendant Jeanette was a human traffic --

22 A How many times?

23 Q More times than I can count.

24 A More times that you can count?

25 Q Probably over 100 times.

1 A No. Not over 100 times, no.

2 Q You posted one time 15 times in one day.

3 A Probably. Using an automated.

4 Q Did you make any effort to go to Jeanette  
5 Runyon's blog and see that I had a translated letter from  
6 the prosecutor general of the Ukraine?

7 A No. Because I wasn't going to stalk you. I  
8 wanted you out of my life.

9 Q Blog is public.

10 A I wanted you out of my life. I didn't want to  
11 search for you.

12 Q So let me get this straight. You didn't  
13 care --

14 A I only searched for Runyon, Thomas Mix when I  
15 was searching for, because I only cared about what you  
16 wrote about me. I didn't care about anything else about  
17 you except for what you were writing about me.

18 MS. RUNYON: Here is 50.

19 (Exhibit Number 50 was marked for  
20 identification.)

21 BY MS. RUNYON:

22 Q Had it occurred to you that you brought this  
23 attention upon yourself by defaming me by calling me a  
24 convicted human trafficker over and over again? I didn't  
25 know who the hell you were. I do know who you are now.

1 But I didn't care who you were before. You came to my  
2 Twitter and started defaming me, so now I pay attention  
3 to you.

4 A Apparently every day.

5 MR. GROOM: No question was asked.

6 MS. RUNYON: Here it is. This is 50.

7 BY MS. RUNYON:

8 Q This is a certified translation from the  
9 prosecutor general of the Ukraine saying that I had  
10 committed no crime.

11 A Okay.

12 Q So you don't care?

13 A I don't care, no.

14 Q That's good to know.

15 MS. RUNYON: You're hearing this, right,  
16 Counselor?

17 THE WITNESS: It has nothing to do with the way  
18 that you're harassing me.

19 BY MS. RUNYON:

20 Q Have you ever posted to various human traffic  
21 organizations that Defendant is a human trafficker?

22 A Posted to the organizations?

23 Q Yes, you did.

24 A No.

25 Q Here it is. Here's a human trafficking,

1 Traffic In People, Exhibit 50.

2 A Is it on Twitter?

3 Q That one's on Twitter.

4 A Okay. Twitter, yes.

5 MR. GROOM: What is that marked as?

6 THE WITNESS: It's not marked at all.

7 MS. RUNYON: We haven't marked it yet. We need  
8 to mark these. I'm going too fast. I'm sorry.

9 This 51.

10 (Exhibit Number 51 was marked for  
11 identification.)

12 MS. RUNYON: This is 52.

13 (Exhibit Number 52 was marked for  
14 identification.)

15 BY MS. RUNYON:

16 Q This is a repost of one day you were very busy  
17 and posted that I was a human trafficker maybe 12 times,  
18 one right after the other, and it got picked up on  
19 Facebook and reposted as well.

20 A Okay. Well, that's not my fault.

21 Q I just discovered that last week. It's your  
22 post.

23 A Wait a minute. You said, you just claimed in  
24 this deposition that you discovered this last week.

25 Q No, last year. I discovered it last August.

1 A It wasn't my post, though.

2 Q It is your post.

3 A I don't know what to tell you.

4 Q It's been reposted.

5 A We'll, that's not my fault that it was  
6 reposted.

7 Q The defamation is from you.

8 A Purported defamation.

9 MR. GROOM: No question was asked.

10 BY MS. RUNYON:

11 Q So you used the Google shot search, and you  
12 didn't bother, you just searched my name. You managed to  
13 pull up the NOManiacs page; is that correct?

14 MR. GROOM: Objection as to form on that one.

15 THE WITNESS: That's incorrect.

16 BY MS. RUNYON:

17 Q When you did the Google search initially, you  
18 just put Jeanette Runyon?

19 A And my name and anything that you may use as --

20 Q Why would you do that in 2013?

21 A No, I didn't. No, Kaitlyn Hunt's mother found  
22 the name NOManiacs page about, if you recall.

23 Q No, I don't recall actually.

24 A She's the one who found it, and you know that.

25 Q Actually, I do not know that.

1 A Well, now you do.

2 Q Can't read my mind.

3 Alrighty. So here again you have reposted, "I  
4 would believe a pile shit before you."

5 A That's accurate, I would.

6 MS. RUNYON: So this is 53, please.

7 (Exhibit Number 53 was marked for  
8 identification.)

9 MS. RUNYON: All right. 54.

10 (Exhibit Number 54 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q If you had put my name in Google, you would  
14 come up with several international law books discussing  
15 my case.

16 A Again, that would involve --

17 MR. GROOM: There is no question asked.

18 BY MS. RUNYON:

19 Q You have claimed that I have sealed court  
20 documents about the Ukrainian incident. You've posted  
21 that.

22 A Uh-huh.

23 Q Would you be surprised to know there are no  
24 court documents?

25 A Would be unsure because they were sealed.



1 There is some documents on yours that were sealed.

2 Q I'm talking about the Ukrainian incident.

3 A Well, you need to be specific then. You need  
4 to be specific with what I'm talking about.

5 Q Are you surprised to learn that I don't have  
6 any court documents, according to Ukraine?

7 A You need to be specific about what document  
8 that I may be referring to that you say that I'm  
9 referring to.

10 Q You said I have sealed court documents  
11 involving the Ukraine incident.

12 A I believe that you received those sealed  
13 documents, so you should have them in your possession.

14 Q No documents exist.

15 A Well, yeah, they do.

16 Q Not about the Ukraine, and you will get to see.

17 A Sealed documents exist.

18 Q Yes. And you'll get to see some.

19 A And I think, if I remember correctly, I  
20 probably written probably about the Ukraine.

21 MR. GROOM: Are we at that breakpoint yet?

22 MS. RUNYON: We're going to take a break right  
23 now as a matter of fact. I was just thinking about  
24 that, because my throat is dry.

25 (A short break was taken.)

1 BY MS. RUNYON:

2 Q So have you ever posted that I have sealed,  
3 Defendant Jeanette has sealed criminal records?

4 A Yes, I probably have.

5 Q I'm just saying I'm going to pull some of these  
6 out. Have you ever posted, "I say she sealed all her  
7 criminal record for a reason"?

8 A Can't recall.

9 MS. RUNYON: This would be 55.

10 (Exhibit Number 55 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q Have you ever posted Jeanette Runyon has  
14 sealed -- oh, no, I wasn't going to do that one. Have  
15 you ever referred to Jeanette Runyon, "I find it's funny  
16 she has gone through all the trouble to seal all her  
17 legal troubles. She's got a guilty conscious"?

18 A I'm not sure. Do you have a tweet of it?

19 Q Yes, I do.

20 A Thank you.

21 MS. RUNYON: This is Number 56.

22 (Exhibit Number 56 was marked for  
23 identification.)

24 MS. RUNYON: 57.

25 (Exhibit Number 57 was marked for

1 identification.)

2 BY MS. RUNYON:

3 Q Please read. Read out loud.

4 A Oh, you want me to read it?

5 Q Read it out loud.

6 A Oh, okay. "She got someone to seal all her  
7 convictions."

8 Q You didn't read the rest. I'm sorry, read the  
9 whole thing. Never mind. I'll read it. "She got  
10 someone to seal all her convictions. Probably cried on  
11 some conservative Christian forum and got donations."  
12 Now, what evidence do you have that I have sealed  
13 criminal records? Not sealed records, sealed criminal  
14 convictions.

15 A Because I found a sealed portion of your  
16 criminal records on I believe Scribd.

17 Q No. It's PACER has Scribd.

18 A I don't think PACER. Maybe it is. I found it  
19 on some type of --

20 Q There are no sealed criminal records.

21 A I think I provided some for my attorneys. Oh,  
22 you have what I found?

23 Q Of course I do. I printed up an extra copy.

24 A Oh, you have the original or something?

25 Q That's not the original. That's the copy off

1 of PACER.

2 A Oh, no, that's not what I have.

3 Q That is what you have. You just went to a  
4 different -- you went to PlainSite.

5 A Is that what it is?

6 Q Yeah, it's PlainSite.

7 A Because it only says, like, sealed, sealed,  
8 sealed, or whatnot.

9 MS. RUNYON: So this is Exhibit 58.

10 (Exhibit Number 58 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q It has two things that are sealed. I think it  
14 runs backwards. It has a summons. You could see that.

15 THE WITNESS: You would be better interpreting  
16 that than I.

17 BY MS. RUNYON:

18 Q It's just a summons that is sealed. You know  
19 what a summons is, I assume.

20 A Uh-huh.

21 Q And the next page is the other sealed document?

22 A Right here?

23 Q Yes. Now, read what it says, please, out loud.

24 A "Sealed sentencing memorandum. Sealed-attorney  
25 available to Jeanette Tye Runyon, USA. Attachments

1 Number 1 Exhibit A, Number 2 Exhibit B, Number 3 Exhibit  
2 C. Rauscher, Claire. Entered 08/04/2009."

3 Q Does it say anything about criminal?

4 A Not there, in that particular area.

5 Q That's the only two things that are sealed.

6 And here exhibit -- do you know what a sentencing  
7 memorandum is?

8 A No.

9 MS. RUNYON: I'm going to give you a short  
10 term. The lawyer states the background of the case,  
11 what you've been convicted of, and then a bunch of  
12 letters saying please give -- and please be nice to  
13 her or him. That is what's in there.

14 Because I cannot trust you to not share this  
15 with Troll Nicole Bonnet, I'm giving you one letter  
16 that's evident -- there's nine pages of these letters.  
17 So this would be Exhibit 59.

18 (Exhibit Number 59 was marked for  
19 identification.)

20 THE WITNESS: I believe all those will be  
21 public record.

22 BY MS. RUNYON:

23 Q No, they're not public record. They're there  
24 to protect -- they're sealed to protect -- these are  
25 sealed to protect the people who --

1 A If there's an exhibit --

2 MR. GROOM: There's no question.

3 BY MS. RUNYON:

4 Q This is a public record, yes. This will be  
5 public record. Father Keith has allowed me to do that  
6 because he's retired of the Air Force. He's also a  
7 former piece officer. And if he gets harassed, he has a  
8 weapon. I'm not worried about you. I'm worried who you  
9 send this to.

10 A You're assuming I'm going to send this to  
11 somebody.

12 Q Nicole Bonnet. You send everything to her.

13 A No. She actually sends your stuff to me.

14 Q That is simply a letter from my priest saying  
15 wonderful things about me. That is an example of what's  
16 in those sealed records. So have you investigated any  
17 another sealed records?

18 A No. I don't stalk you.

19 Q So then you don't have any evidence that I have  
20 sealed criminal convictions?

21 A I have the sealed document I gave my attorneys  
22 at the beginning of this lawsuit.

23 Q It's the same as this.

24 A That's what you say. I have no idea.

25 Q I just gave you a better copy.

1           A    This is what you're saying. This is what  
2           you're providing me.

3           Q    Those are the only sealed documents available.  
4           So are you aware that a private person cannot get  
5           somebody to seal their records?

6           A    No. I don't really care.

7           Q    You don't care. Are you aware that federal  
8           criminal convictions in North Carolina cannot be sealed?  
9           So you don't care about that either?

10          A    No, I don't know.

11          Q    So you don't care, but you --

12          A    No. The answer to that was, no.

13          Q    No. But you're willing to say that I had  
14          sealed criminal records more than once?

15          A    Well, you never provided anything public to  
16          refute it, except your word. That word wasn't very good.

17          Q    Alrighty. Did you claim that you hoped I would  
18          lose access to the Internet?

19          A    Oh, I think you should.

20          Q    Did you claim you want the judge to order me  
21          not to have access to the Internet?

22          A    I think some judge should take a heavy look at  
23          you and the content you write. Yes, I do.

24                MS. RUNYON: This would be 60 and 61, please.

25                (Exhibit Numbers 60 and 61 were marked for

1 identification.)

2 BY MS. RUNYON:

3 Q Did you have Tumblr blogs devoted to my posts?

4 A Tumblr blogs?

5 Q Yes.

6 A I have a Tumblr blog dedicated to harassment  
7 that you've posted about me, yes.

8 Q All right. Do you claim that Defendant  
9 Jeanette Runyon has hurt your reputation?

10 A Yes.

11 Q Be specific, how have I hurt your reputation?

12 A Well, by plastering my name, city, address all  
13 over the Internet, hashtagging my name, hashtagging  
14 anything that you can associate with me as far as my  
15 gaming tags or any another social media such as LinkedIn  
16 or the Tumblr or any other social media. You've hunted  
17 down practically all my social media, even the  
18 Foursquare, which I've completely forget about. So it  
19 would go to find me -- what was your original question?

20 Q How has that hurt your reputation?

21 A My, God. Search engine.

22 Q How do you compute?

23 A How do I compute?

24 Q Yes. How do you com --

25 A I'm trying to answer your question. Would you



1 like me to answer?

2 Q Okay.

3 A I'm coming to that conclusion based upon the  
4 fact that we're in the information era. Something that  
5 you -- not you stated in particular, so I'll digress from  
6 that. But it was very important, Matthew Ross, who  
7 you've mentioned numerous times in your deposition, who  
8 is also the conservative blogger on Conservative Hideout  
9 dot com --

10 Q Which hasn't existed for two years.

11 A Because he's now a proclaimed priest or  
12 whatever.

13 MR. GROOM: Stay to the question.

14 THE WITNESS: You guys have perpetuated the  
15 fact that, even during the Kaitlyn Hunt case, that  
16 what's going to be online is online forever with the  
17 pure intent to cause harm, extended harm, long-term  
18 harm. That was the intent. And this has been your  
19 intent the entire case, as you've been writing about  
20 me, using my name, getting Robert Stacy McCain back  
21 involved in it even during this court case and  
22 having them email my attorneys. Weird.

23 BY MS. RUNYON:

24 Q So you're claiming that mentioning your name on  
25 the Internet is harmful?

1           A    The way that you've been doing. As the  
2           Defendant Jeanette Runyon has been doing it, yes. That  
3           has been extremely harmful.

4           Q    But calling the Defendant Jeanette Runyon a  
5           convicted human trafficker is not harmful? Is that  
6           harmful?

7           A    I didn't know if it was true or not. I'm going  
8           based upon a NOManiac's page.

9           Q    Even though you were informed it was not true  
10          you --

11          A    By who?

12          Q    Me.

13          A    Again, we're going by the sources. You're not  
14          a good source of information on my behalf. I think the  
15          court will realize that.

16          Q    Did you make any effort to find out if it was  
17          true or not?

18          A    No, because I have no interest in you. You're  
19          the one obsessed with me, which is why I'm suing you.  
20          You're countersuing me for fun, but I'm really suing you.

21          Q    It's not fun. All right. So here we are. So  
22          you think I hurt your reputation. Let me go on.

23                   Does posting that your support for Christian  
24          genocide, does that hurt your reputation?

25          A    I've never supported Christian genocide.

1 MS. RUNYON: As a matter of fact, you have.

2 This is 62.

3 (Exhibit Number 62 was marked for  
4 identification)

5 BY MS. RUNYON:

6 Q Please read your post.

7 A Oh, I'll read this, certainly. You repost this  
8 all the time. The tweet says, "Because Christians want  
9 death to gays, I don't mind Christians being murdered in  
10 other countries for who they don't want to be either."

11 So what I was actually referencing there is the  
12 fact that you, in consideration, are obsessed with this.  
13 Why are you are obsessed with this when it has nothing to  
14 do with about you?

15 Q Because Christian genocide --

16 A You are stalking my accounts. You're so weird.

17 Q That's not my question. Posting to President  
18 Trump that you hope he's assassinated, does that's hurt  
19 your reputation?

20 A That I hope he's assassinated? When did I post  
21 that?

22 MS. RUNYON: Here we go. This would be 63.

23 (Exhibit Number 63 was marked for  
24 identification).

25 BY MS. RUNYON:

1 Q To Director Comey, I hope you're whacked and  
2 burn in hell, does that hurt your reputation?

3 A I don't know. What alias am I using?

4 Q It's just offensive.

5 A What alias am I using? Thomas Arzi, correct?

6 Q Yes.

7 A Yes. Thank you.

8 MR. GROOM: Did you want to mark that?

9 MS. RUNYON: Yes.

10 THE WITNESS: Let's just be clear, I'm not  
11 using my real identity. You are the one telling  
12 people my identity.

13 (Exhibit Number 64 was marked for  
14 identification.)

15 BY MS. RUNYON:

16 Q Does posting your support for people burning  
17 and losing their homes in the Gatlinburg fire, doesn't  
18 that hurt your reputation?

19 A What alias was that under?

20 Q You're Thomas Arzi. You have made no effort to  
21 hide that that's you.

22 A No. I think that Ms. Runyon, the Defendant,  
23 has made every attempt to actually make sure everyone  
24 knows that I am Thomas Arzi. I have proof of that.  
25 Thank you.

1 MS. RUNYON: Alrighty. This will be 65.

2 (Exhibit Number 65 was marked for  
3 identification.)

4 BY MS. RUNYON:

5 Q Does posting that you want Ray Comfort shackled  
6 by hands and feet and whipped so hard the whip cracks on  
7 his back, does that help your reputation any?

8 A I have no idea what that is. May I see it?

9 MS. RUNYON: Yes.

10 (Exhibit Number 66 was marked for  
11 identification.)

12 THE WITNESS: Again, Thomas Arzi is the alias.  
13 And what is this in reference to? Because what  
14 you're doing is you're just pulling random tweets  
15 when they're actually part of a conversation. So  
16 you're just pulling random tweets out and putting  
17 them together with no sense of purpose.

18 BY MS. RUNYON:

19 Q Does telling somebody to go fuck the barrel of  
20 your gun, does that help your reputation?

21 A Was this under Thomas Arzi as well? Yes,  
22 Thomas Arzi.

23 MS. RUNYON: This would be 67.

24 (Exhibit Number 67 was marked for  
25 identification.)

1 THE WITNESS: Again, not describing myself.  
2 You've done a good job on telling people I'm Thomas  
3 Arzi.

4 BY MS. RUNYON:

5 Q Does posting, I hope all white collar men are  
6 jobless, that would make me glee with joy, help your  
7 reputation?

8 A Was that posted Under Thomas Arzi?

9 Q It was.

10 A Thank you.

11 MS. RUNYON: 68.

12 (Exhibit Number 68 was marked for  
13 identification.)

14 BY MS. RUNYON:

15 Q Does posting, "Stupid homo, do you suck Milos  
16 ass," help your reputation any?

17 (Exhibit Number 69 was marked for  
18 identification.)

19 THE WITNESS: Was that posted under Thomas  
20 Arzi? Again, for the record, you have told people I  
21 am Thomas Arzi. Not me.

22 BY MS. RUNYON:

23 Q You have also done the same.

24 A No, I haven't. You need to prove that  
25 statement, ma'am.

1 MS. RUNYON: 70.

2 (Exhibit Number 70 was marked for  
3 identification.)

4 BY MS. RUNYON:

5 Q "Real Donald Trump, you are literally an anus  
6 with lips." Does that help your reputation?

7 A Again, that's under Thomas Arzi.

8 Q I don't think I'm going to use these.

9 A I'm just going to keep going if it says under  
10 Thomas Arzi.

11 Q Do you call Malania Trump a hooker, does that  
12 help your reputation?

13 A I don't believe I called her that.

14 Q "Used to be a hooker. I promised never to say  
15 that she used to be one."

16 A I think you need to re-grammar. I don't  
17 believe that's me saying it.

18 Q Thomas Arzi. You've admitted to being Thomas  
19 Arzi.

20 A No. You've actually claimed that I'm Thomas  
21 Arzi. But I am Thomas Arzi in the court, of course. I'm  
22 telling you you've claimed to other people that I'm  
23 Thomas Arzi. You've told them that my name is Thomas  
24 Mix.

25 MS. RUNYON: This would be 71, please.

1 (Exhibit Number 71 was marked for  
2 identification.)

3 THE WITNESS: The FLOTUS. This is the First  
4 Lady.

5 MS. RUNYON: And this would be 72.

6 (Exhibit Number 72 was marked for  
7 identification.)

8 BY MS. RUNYON:

9 Q This is a post you made of the 45th President  
10 as being an orangutan drinking his own piss. I'm sure  
11 that helps your reputation too.

12 A It's under Thomas Arzi.

13 Q Did you ever post the Defendant Jeanette Runyon  
14 committed Social Security fraud?

15 A According to the NOManiacs you did. In the  
16 statement, yes, I did make that statement based upon  
17 NOManiacs.

18 Q You don't have any evidence to support that  
19 statement?

20 A On NOManiacs. You clearly weren't able to get  
21 the NOManiacs down for some reason.

22 Q That's not the point. Do you have evidence  
23 that I have posted --

24 A The NOManiacs blog, yes.

25 Q That's not the question I'm asking you.



1 A Yes, you are.

2 Q No. I'm asking, do you have evidence that I  
3 have committed Social Security fraud?

4 A A NOManiacs blog.

5 Q That's not evidence.

6 A Well, I'm sorry. That's the answer.

7 Q Do you care that that's evidence?

8 A That's my answer.

9 MS. RUNYON: All right. That's 73, please.

10 (Exhibit Number 73 was marked for  
11 identification.)

12 BY MS. RUNYON:

13 Q Did you ever post that I might have killed my  
14 child?

15 A I hope not. May I see the post?

16 MS. RUNYON: Yes. Let me mark it 74.

17 (Exhibit Number 74 was marked for  
18 identification.)

19 THE WITNESS: Well, who do you know who I'm  
20 talking about here?

21 BY MS. RUNYON:

22 Q You're perseverating at this point. Did you  
23 ever post that I might have killed -- I beat and crippled  
24 my mother?

25 A No.

1 MS. RUNYON: You did, in fact, repost it. This  
2 will be 75.

3 (Exhibit Number 75 was marked for  
4 identification.)

5 THE WITNESS: You asked if I posted it. Not if  
6 I had reposted, Dear. You said if I posted it.

7 BY MS. RUNYON:

8 Q Mr. Mix, you're upset that I repost something.  
9 I can do in kind.

10 A No, I'm just telling you how you sent it to me  
11 in deposition.

12 Q You shared this. Did you ever repost that  
13 she's a pedo and the state knows it, that's what she's  
14 trying to hide?

15 A Am I referencing you in this?

16 Q Yes, you are.

17 A By name? If I'm not mentioning you by name,  
18 no.

19 Q It's a long conversation about me.

20 A Well, then you better get the long conversation  
21 forum.

22 MS. RUNYON: I can do that. This is 76.

23 (Exhibit Number 76 was marked for  
24 identification.)

25 THE WITNESS: Because you've been trying to

1           throw a lot of things that this anonymous Nicole  
2           Bonnet 1 has said on me lyingly. Don't lie.

3 BY MS. RUNYON:

4           Q    Did you ever repost, "She thinks nonstop about  
5 sex with minors. She had a child removed from her  
6 custody. She's a pedo"? That would be 77.

7           A    I didn't tweet that.

8           Q    You retweeted it. You shared it.

9           A    I didn't tweet that.

10          Q    It says so right here.

11          A    I also have on here, retweets do not equal  
12 endorsements. I've always had that on my Twitter  
13 biography. Retweets are not endorsement, ma'am. I've  
14 always had that on my Twitter page.

15          MR. GROOM: What is that marked as?

16          MS. RUNYON: It's 76. He grabbed it.

17          THE WITNESS: In fact, they all say retweets  
18 are not endorsements. So all the retweets that  
19 you're doing --

20          MR. GROOM: There's no question asked.

21          Could you please mark that 77.

22          (Exhibit Number 77 was marked for  
23 identification.)

24 BY MS. RUNYON:

25          Q    All right. And did you retweet, "She's just

1 like this anti-gay pedo, Lisa Biron"?

2 MS. RUNYON: This would be 78.

3 (Exhibit Number 78 was marked for  
4 identification.)

5 BY MS. RUNYON:

6 Q Have you ever posted that Defendant Jeanette  
7 Runyon is a welfare queen?

8 A I don't believe I have.

9 Q You, in fact, have.

10 A Probably. I can't remember. I can't recall.

11 MS. RUNYON: 79, please.

12 (Exhibit Number 79 was marked for  
13 identification.)

14 BY MS. RUNYON:

15 Q Have you ever posted that Defendant is mentally  
16 ill?

17 A Probably. I can't recall.

18 MS. RUNYON: This would be 80. You're posting,  
19 Darn facts.

20 (Exhibit Number 80 was marked for  
21 identification.)

22 BY MS. RUNYON:

23 Q You, apparently, thought I was Twitter persona  
24 Darn Facts. I was not.

25 A That's your assumption.

1 Q I know who Darn Facts is. She'll probably come  
2 to court to testify.

3 A That would be fantastic. But that's your  
4 assumption, not mine.

5 Q Have you ever posted that Jeanette Runyon has  
6 severe mental issues?

7 A With your harassment of, yeah, I probably did.  
8 Because it is kind of nutty.

9 Q But you don't have any -- excuse me, do you  
10 have any evidence that I was severely mentally ill?

11 A Yeah, when I made that comment. You repeatedly  
12 obsessing over me is weird.

13 Q That's not evidence.

14 MS. RUNYON: This would be 81, please.

15 (Exhibit Number 81 was marked for  
16 identification.)

17 THE WITNESS: No evidence to you.

18 MR. GROOM: No question was asked.

19 MS. RUNYON: This would be 82.

20 (Exhibit Number 82 was marked for  
21 identification.)

22 BY MS. RUNYON:

23 Q Have you ever posted that Jeanette Runyon was  
24 ever institutionalized?

25 A Is that a conversation or just a random tweet

1 you just pulled out? Like, who am I referring to there?

2 There's no reference to you at all in that tweet.

3 Q Have you ever posted that I need a 72-hour  
4 evaluation, the Defendant Jeanette Runyon needs a 72-hour  
5 evaluation?

6 A Well, yeah. When you started out stalking me  
7 as much as you did, man, I thought you needed that.

8 Q Have you ever posted that I've been committed?

9 A Not that I recall. I think Nicole Bonnet was  
10 the one who was real insistent on that. I never had any  
11 proof. Didn't care if you were or not. I just wanted  
12 you out of my life.

13 MS. RUNYON: This would be 83.

14 (Exhibit Number was 83 marked for  
15 identification.)

16 BY MS. RUNYON:

17 Q Have you ever posted the Defendant was bipolar?

18 A Perhaps. You definitely acted like it. You  
19 kept on being obsessive over me, so it's quite possible.  
20 I don't know the dates that you're actually pulling these  
21 tweets from. They're really out of chronological order.  
22 Not that they have to be, but, yeah.

23 Q Have you ever posted that Defendant hears  
24 voices?

25 A Not that I recall.

1 Q Maybe this will jog your memory.

2 A It will be helpful if you have it.

3 MS. RUNYON: This will be 84.

4 (Exhibit Number 84 was marked for

5 identification.)

6 THE WITNESS: May I see it?

7 MS. RUNYON: Make this 85.

8 (Exhibit Number 85 was marked for

9 identification.)

10 THE WITNESS: I'm going to read this --

11 MR. GROOM: There's no question asked. There's  
12 no question.

13 THE WITNESS: I know. You're reading it,  
14 though, right?

15 MR. GROOM: Right.

16 BY MS. RUNYON:

17 Q Have you ever posted that Jeanette Runyon, the  
18 Defendant, was institutionalized?

19 A I can't recall.

20 Q This is 85. This is from the Kaitlyn Hunt page  
21 when you were discussing Erika the Short. I'm not sure  
22 what her real name is.

23 A Well, according to your --

24 MR. GROOM: There is no question asked.

25 BY MS. RUNYON:

1 Q This is yes or no, have you ever answered this?  
2 Have you ever posted?

3 A Apparently, by that particular page,  
4 accordingly, I have.

5 MR. GROOM: Objection as to form on that last  
6 one.

7 BY MS. RUNYON:

8 Q Have you ever posted that my husband has left  
9 me?

10 A Not that I'm aware of, nor would I care.

11 (Exhibit Number 86 was marked for  
12 identification.)

13 BY MS. RUNYON:

14 Q Do you have any evidence that my husband has  
15 ever left me?

16 A No, because I don't care.

17 Q So that's why you posted my husband left me,  
18 because you don't care? Why would you post that if you  
19 didn't care?

20 A How do you know I'm talking about you here?  
21 Does it say "Jeanette Runyon" here?

22 Q I can pull it up.

23 A Then you need to pull up stuff instead of just  
24 handing me random tweets that don't even have your name  
25 in it.



1 Q So you're discussing somebody of no name that  
2 has -- who is a convict human trafficker. I get that.

3 Okay. Did you ever post I was the reason why  
4 Russians don't want Americans adopting children?

5 A I can't recall.

6 MS. RUNYON: This would be 87. And show that  
7 to the Plaintiff. And this would be 88.

8 (Exhibit Numbers 87 and 88 were marked for  
9 identification.)

10 BY MS. RUNYON:

11 Q Have you ever posted that I have a dick?

12 A At this point I'd like to see the tweet first  
13 before I answer, because these tweets aren't even  
14 mentioning your name.

15 MS. RUNYON: Mr. Mix, here is the conversation  
16 where I was being called -- a part of the  
17 conversation you were having with Nicole Bonnet  
18 about me, a little bit more in context.

19 This will be 89.

20 (Exhibit Number 89 was marked for  
21 identification.)

22 BY MS. RUNYON:

23 Q Have you ever said that I need a 72-hour  
24 evaluation? Here it is. This is with my name. That  
25 would be 90. You didn't answer that. Yes or no?

1           A    I'm sorry. What was your question again? I  
2 actually answered this earlier. I did actually answer  
3 that earlier in this deposition. She can go back on the  
4 record and find it.

5           MS. RUNYON: You can mark that 90, please.

6           (Exhibit Number 90 was marked for  
7 identification.)

8 BY MS. RUNYON:

9           Q    Have you ever posted young boys were molested  
10 at my house, at Jeanette Runyon's house?

11          A    Not that I'm aware of.

12          MS. RUNYON: Mark this 91.

13          (Exhibit Number 91 was marked for  
14 identification.)

15 BY MS. RUNYON:

16          Q    Why don't you read it. Read it out loud,  
17 please. Sorry, read it out loud. This is your post.  
18 Read it out loud.

19          A    Okay. Not knowing what conversation this has  
20 to do with at all, just another random tweet, Defendant's  
21 Exhibit 91, at Little Hart, at Trubie 2013. "How many  
22 young boys were molested in the name of God?" Referring  
23 to priests in the Catholic church. "A ton. Where is the  
24 West Baptist church at? At Jeanette's house probably."

25          Q    Finally, have you ever called Jeanette Runyon a

1 cunt?

2 A Probably.

3 MS. RUNYON: This would be 92 and 93.

4 (Exhibit Numbers 92 and 93 were marked for  
5 identification.)

6 BY MS. RUNYON:

7 Q Read this out loud, please.

8 A Oh, yes. Before I do read it, this is  
9 Defendant's Exhibit 92, reference for her continuing to  
10 stalk me date. The date on this is January 10th of 2014,  
11 mind you, not so long after we began communicating. At  
12 Tabitha Martin 50, many of your twitter handles.

13 Q Yes.

14 A "Don't mention me you baby-buying cunt." Then  
15 I posted the NOManiacs blog and with the hashtag Op Pedo  
16 Fear, hashtag Human Trafficking, hashtag Criminal,  
17 hashtag Lib Crib, hashtag Unite Blue.

18 Q And have you ever called me a mental retard?

19 A Probably. Not sure. I can't recall.

20 Q Am I stuttering now? I do smell like shit?

21 A That's to be determined. I mean, you need to  
22 let me see the tweets.

23 Q I'm asking you if you remember these.

24 A And I'm telling you I don't recall.

25 MS. RUNYON: This will be the last tweet. This

1 is 94.

2 (Exhibit Number 94 was marked for  
3 identification.)

4 BY MS. RUNYON:

5 Q Mr. Mix, I just have a little comment here and  
6 I'll let -- if you want to leave anything. You came into  
7 my life calling me a convicted human trafficker. I  
8 didn't know you from Adam, and I didn't care who you  
9 were. You posted up to 15 times a day over and over, and  
10 you pass that around.

11 To expect me not to be upset to be falsely  
12 accused is outrageous. I didn't care then. I gave you  
13 multiple opportunities for me to leave you alone. I  
14 said, just delete the lies about me and I will pretend  
15 you didn't exist. You refused to do that. In fact, you  
16 double downed. Then you sued me.

17 Now, I make sure I pay attention to everything  
18 you post because I have to. You had the opportunity to  
19 make this go away, and you double downed. You obviously  
20 don't care what you say about me is true or not. You  
21 just admitted that. Now, you have an opportunity -- here  
22 you go. That's one of your posts.

23 A That one sent because she's claiming that I was  
24 on her Gab.

25 Q All right. Do you want to make a statement?

1 You're more than welcome to do so.

2 MR. GROOM: No. That's all right. I'm going  
3 to ask a few questions.

4 CROSS-EXAMINATION

5 BY MR. GROOM:

6 Q All right. I need to see Exhibit 28, I  
7 believe. Could you please read basically that whole top  
8 of the post.

9 A Yes. "Deplorable Rican, redeemed, three years  
10 ago. FYI Thomas A. Mix who keeps claiming I am violent  
11 criminal was apparently projecting his parents were  
12 afraid."

13 Q Thank you. All right. Do you believe the  
14 Internet is real life?

15 A I do.

16 Q So anything that someone says on the Internet  
17 could potentially harm someone else?

18 A Yes.

19 Q All right.

20 MS. RUNYON: So therefore --

21 MR. GROOM: Hold on. I ask the questions right  
22 now.

23 MS. RUNYON: This my deposition.

24 MR. GROOM: You can follow-up afterwards.

25 MS. RUNYON: All right.

1 MR. GROOM: It's sort of the formalities of  
2 this.

3 BY MR. GROOM:

4 Q So you stated that the Defendant asked for  
5 people to hack your account?

6 A Not in the -- she was soliciting hacking. She  
7 was soliciting hacking for trolls, including me and  
8 Nicole Bonnet.

9 MS. RUNYON: Actually, your name was never  
10 mentioned.

11 MR. GROOM: Hold on.

12 MS. RUNYON: He's lying.

13 MR. GROOM: You can ask him questions  
14 afterwards. Let me ask.

15 MS. RUNYON: Okay.

16 BY MR. GROOM:

17 Q So are you aware if she's done this  
18 solicitation for hacking before?

19 A She's done solicitation for hacking, yes.

20 Q All right. And then she's followed your  
21 Twitter and posted your tweets?

22 A That's correct. She's done it up to this  
23 morning actually. She has two posts on her Gab that  
24 Nicole Bonnet sent to me this morning.

25 Q So when you post on this Gab account --

1 A I don't post on it.

2 Q Well, when she posts on this Gab account, is it  
3 published in the essence that other people see it?

4 A Yes.

5 Q And she's posting on that account about you?

6 A What it seems like, yes.

7 MR. GROOM: Now my questions are done. Now you  
8 can ask questions.

9 REDIRECT EXAMINATION

10 BY MS. RUNYON:

11 Q First of all, I didn't solicit hacking.  
12 There's a difference. I solicited somebody to find out  
13 who Nicole Bonnet was. I never solicited anybody to go  
14 into anybody's computer, which is what hacking it is.  
15 Your name was never mentioned, because I know who you  
16 are. So it doesn't matter. I didn't solicit anybody to  
17 go into anybody's computer. Now, you can do go do that,  
18 but I understand it. And I understand your --

19 And the other thing is you are trying to -- bad  
20 behavior is not a tort. I'm paying attention to you  
21 because -- let me back up a minute. You said that you  
22 think the Internet is real life.

23 A I don't think it. The Internet is real life.

24 MR. GROOM: No question was asked.

25 BY MS. RUNYON:

1 Q In your opinion, the Internet is real life.  
2 Did it occur to you that posting close 100 times that I'm  
3 a convicted human trafficker might affect my real life?

4 A I didn't post it close to 100 times.

5 Q Yes, you did. Yes, you did. Over a space of  
6 four years, yes, you did.

7 A Well, then prove it in court.

8 Q That's not the point. The point is you said  
9 Internet is real life.

10 A That is the point.

11 Q When you post that somebody has committed a  
12 horrific crime, a felony when they had not, don't you  
13 think that would make somebody upset?

14 A I think by the way that you presented that  
15 information to me, you should prove it in court.

16 Q I don't have to prove it in court. It's  
17 already proven if I have a conviction. You don't  
18 understand. I don't know if your lawyer has told you,  
19 you have to prove it in court. I do not. You have to  
20 prove.

21 A Yeah, you have to prove your assumptions about  
22 me, ma'am. I don't have to prove --

23 Q I don't have to prove anything because I have  
24 not committed the crimes that you --

25 A You have to prove your countersuit against me.



1 Q Yes. I do not have any felonies whatsoever  
2 anywhere.

3 A Okay. So what was your question?

4 Q I said, you are saying that the Internet is  
5 reality life. Did it occur to you that lying about  
6 somebody repeatedly that they have committed a  
7 horrendous, horrific crime would affect their real live?

8 MR. GROOM: Objection as to form.

9 BY MS. RUNYON:

10 Q Do you believe posting publicly that somebody  
11 committed a felonous crime would affect their real life?

12 A If I was purposely saying, oh, she committed  
13 this crime, and I'm just saying it because it was my  
14 information and I was the only one providing that  
15 information, yeah, I would say you have a leg to stand  
16 on.

17 Q But somebody more than -- so you made no effort  
18 to find out about if it was true, though?

19 A No. Apparently, you tried to have the  
20 NOManiacs blog removed and you were denied.

21 Q No, that's not exactly what happened.

22 A My answer isn't going to deviate. The  
23 information was received from the NOManiacs blog.

24 Q You don't care whether it was true our not?

25 A You haven't gotten it taken down, so obviously,

1 there must be some truth to it. I don't know what that  
2 truth is.

3 Q That's not how that works.

4 A Well, it must be. Because, you know, I don't  
5 know what to tell. You get it taken down then. I don't  
6 know what to tell you.

7 Q Okay.

8 A I just want you out of my life.

9 Q You had the opportunity, and you refused to do  
10 it.

11 A No. You're stalking me, lady.

12 Q You did not remove defamation of about me. I  
13 was more than willing to settle. You refused. In fact,  
14 you made a big deal about it. I will not settle at this  
15 point.

16 A I'm not going to settle either.

17 Q I figured not. But you have already admitted  
18 you didn't care whether lying about me being a felony  
19 mattered. That's all there is to it.

20 MR. GROOM: No question was asked.

21 MS. RUNYON: I'm done.

22 THE WITNESS: Fantastic.

23 MR. GROOM: All right. So you're finished?

24 MS. RUNYON: I am finished.

25 MR. GROOM: We don't waive reading.

(The deposition concluded at 11:45 a.m.)

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STATE OF FLORIDA    )  
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COUNTY OF ST. LUCIE )

CERTIFICATE

I, Cynthia L. O'Cain, a Notary Public of the  
State of Florida, authorized to administer oaths, certify  
that THOMAS MIX personally appeared before me and was  
first duly sworn to tell the truth.

WITNESS my official seal this 20th day of  
February, 2017.

*Cynthia L. O'Cain*



Cynthia L. O'Cain

My Commission No. FF 187998  
Expires 02/01/2019

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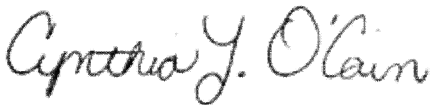
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COUNTY OF ST. LUCIE )

CERTIFICATE

I, Cynthia L. O'Cain, a Shorthand Reporter and Notary Public of the State of Florida at Large, certify that I was authorized to and did stenographically report the deposition of THOMAS MIX; that a review of the transcript was requested, and this transcript is a complete record of my stenographic notes.

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

DATED this 20th day of February, 2017.



\_\_\_\_\_  
Cynthia L. O'Cain

ERRATA SHEET

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PAGE LINE	READS	SHOULD READ

\* \* \*

I hereby certify by the above corrections,  
if any, that the foregoing transcript is a true and  
correct transcription of my deposition taken in the

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above-entitled case at the date and time indicated.

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THOMAS MIX

The foregoing was acknowledged before me by  
THOMAS MIX who is personally known to me or has produced

\_\_\_\_\_ as

identification, and who \_\_\_\_did\_\_\_\_did not take  
an oath, this \_\_\_\_ day of \_\_\_\_\_ 2017.

\_\_\_\_\_

Notary Public

<b>A</b>			
<b>a.m</b> 1:13 99:1	79:18 92:21	97:22	79:7,10,18,19
<b>able</b> 45:12	98:17	<b>answered</b> 88:1	79:21,21,23
80:20	<b>admitting</b> 13:8	90:2	80:12
<b>above-entitled</b>	<b>adopting</b> 89:4	<b>answering</b> 8:24	<b>Arzis</b> 7:11
103:1	<b>adult</b> 16:7 20:19	<b>Anti</b> 54:25	<b>asked</b> 22:2
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