

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AARON RICH,)
)
 Plaintiff,)
)
 vs.) Case No. Civil Action
) 1:18-cv-00681-RJL
 EDWARD BUTOWSKY,)
 MATTHEW COUCH, and)
 AMERICA FIRST MEDIA,)
)
 Defendants.)
 _____)

Videotaped Deposition of THOMAS ANDREW SCHOENBERGER,
taken on behalf of Plaintiff, at 725 South
Figueroa Street, 31st Floor, Los Angeles, California
90017, beginning at 10:18 a.m., and ending at 5:40
p.m., on Thursday, June 27, 2019, before Marceline F.
Noble, RPR, CRR, Certified Shorthand Reporter
No. 3024.

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Reported by: Marceline F. Noble, CSR No. 3024

Job No. 489984

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7

8

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9

(No appearance)

10

11

12 Also Present:

13 RYAN MURPHY, Videographer
Magna Video Services

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INSTRUCTION NOT TO ANSWER
(None)

1 Los Angeles, California, Thursday, June 27, 2019

2 10:18 a.m. - 5:40 p.m.

3

4 THE VIDEOGRAPHER: We are now on the record.

5 This begins videotape No. 1 in the
6 deposition of Thomas Schoenberger in the matter of
7 Aaron Rich versus...

8 Stand by.

9 (Off record.)

10 THE VIDEOGRAPHER: We are now on record.

11 This begins the video No. 1 of Thomas
12 Schoenberger in the matter of Aaron Rich versus
13 Edward Butowsky, in the United States District Court,
14 for the District Court of Columbia.

15 Today is June 27th, 2019. And the time is
16 10:18 a.m.

17 This dep [sic] is being taken at 725 South
18 Figueroa Street, Los Angeles, California.

19 The videographer today is Ryan Murphy of
20 Magna Video Services.

21 And the court reporter is Marceline Noble of
22 Magna Legal Services.

23 Will counsel and all parties present state
24 their appearance and whom they represent.

25 MR. RILEY: Joshua Riley from Boies Schiller

1 Flexner, representing the plaintiff Aaron Rich.

2 MS. HOUDRE: Chloe Houdre from
3 Boies Schiller Flexner, representing the plaintiff
4 Aaron Rich.

5 THE VIDEOGRAPHER: Will the court reporter
6 please swear in the witness.

7

8 THOMAS ANDREW SCHOENBERGER,
9 having been first duly sworn, was examined and
10 testified as follows:

11

12

EXAMINATION

13 BY MR. RILEY:

14 Q. Good morning --

15 A. Sorry.

16 Q. -- Mr. Schoenberger.

17 A. Good morning, Mr. Riley.

18 Q. Thank you for being here today.

19 You understand that you're -- you're under
20 oath? And --

21 A. I do.

22 Q. And -- and what's your understanding of what
23 that -- your understanding what that means, to be
24 under oath?

25 A. Well, there's penalty of perjury, if I lie.

1 Q. Right.

2 So you have to -- you understand that you
3 have to tell the truth today and answer my -- my
4 questions honestly --

5 A. Yes.

6 Q. -- completely.

7 And you understand --

8 A. I'm sorry.

9 Q. It's okay.

10 A. I have pneumonia.

11 Q. Do you need a break?

12 A. No.

13 Q. Are you okay? Let me know --

14 A. Maybe for a quick --

15 MR. RILEY: Sure. Why don't we -- why don't
16 we go off the record for just a moment until
17 Mr. Schoenberger --

18 THE VIDEOGRAPHER: Stand by.

19 We are going off the record at 10:20 a.m.

20 (Short recess.)

21 THE WITNESS: Okay. I think I'm ready.

22 THE VIDEOGRAPHER: All right. Stand by.

23 We are back on the record at 10:22 a.m.

24 BY MR. RILEY:

25 Q. Mr. Schoenberger, before we went off the

1 record, I -- I -- I asked you: Is it your
2 understanding that you're under oath today?

3 A. Yes.

4 Q. And what it means to be under oath, is that
5 you need to answer my questions honestly and
6 completely.

7 You understand that --

8 A. Yes.

9 Q. -- correct?

10 And you understand that testifying here
11 under oath at this deposition, is the same as
12 testifying in a courtroom in front of a judge or a
13 jury, in the sense that you need to give testimony
14 that's honest here just as you would there; correct?

15 A. Absolutely.

16 Q. Okay. And is there any reason today that
17 you would not be able to answer my questions
18 truthfully and completely?

19 A. No.

20 Q. Great.

21 Do you have an attorney with you here today?

22 A. No.

23 Q. Okay. And you do understand, though, that
24 you had an opportunity to have counsel with you
25 today; correct?

1 A. Yeah.

2 Q. And you were advised of your right to have
3 counsel with you here today --

4 A. Yes.

5 Q. -- correct?

6 And you understand that my law firm,
7 Boies Schiller Flexner, and none of the lawyers at
8 Boies Schiller Flexner, are your attorneys; correct?

9 A. Correct. You're here to represent Mr. Rich.

10 Q. Right.

11 And you understand that my cocounsel at
12 Wilke Farr and Gallagher, neither Wilke Farr and
13 Gallagher, nor any of their attorneys are your
14 counsel. That's your understanding; correct?

15 A. Correct?

16 Q. Correct?

17 A. Yes, correct.

18 Q. Okay. And you understand that the lawsuit
19 that we're here to talk about today is a lawsuit
20 where a gentleman named Aaron Rich is the plaintiff.

21 Is that your understanding?

22 A. Yes.

23 Q. And is it also your understanding that in
24 the lawsuit that we're here to talk about today, the
25 defendants are Edward Butowsky, Matthew Couch and

1 America First Media?

2 A. Yes.

3 Q. Okay. And do you have a further
4 understanding about what this lawsuit's about?

5 A. I believe it is about defamation of
6 character and invasion of privacy.

7 Sorry.

8 Q. Take your time.

9 Are you okay?

10 A. Yes.

11 Q. Okay.

12 A. Sorry.

13 Q. Take your time.

14 A. Yeah, spit --

15 Q. Are you okay?

16 A. -- nonstop.

17 Yeah, I am.

18 MR. RILEY: Okay. I'm going to mark as an
19 exhibit --

20 And can we use letters for the exhibit? Is
21 that okay?

22 THE REPORTER: Whatever you want.

23 MR. RILEY: I'm going to mark this as
24 Exhibit A, as in "alpha."

25 ///

1 (Deposition Exhibit A was marked for
2 identification by the court reporter.)

3 BY MR. RILEY:

4 Q. I'm going to hand you what the court
5 reporter is marking as Exhibit A, as in "alpha."

6 A. Great.

7 Q. Take a moment and look at that document,
8 please, and let me know --

9 A. Okay.

10 Q. Let me know once you've had a chance -- let
11 me know once you've had a chance to review it.

12 A. Great.

13 (Witness complies.)

14 Reviewed.

15 Q. And, sir --

16 A. I'm really sorry.

17 Q. It's okay. Take your time.

18 Sir, do you recognize that document?

19 A. Yes, I do.

20 Q. Great.

21 And is it your understanding, sir, that that
22 document that I've given you, marked as Exhibit A, as
23 in "alpha," is a subpoena for you to testify --

24 A. Yes.

25 Q. -- today?

1 And if you turn to the third page of the
2 document, please.

3 A. Yes.

4 Q. Do you see at the top, it says it's a
5 subpoena to testify at a deposition in a civil
6 action, and then it says "Thomas Schoenberger"?

7 A. Yes.

8 Q. All right. And that's you?

9 A. That's me.

10 Q. And it says -- down to the left, it says
11 "place," and it says the loca- -- it says, 725 South
12 Figueroa Street, 31st Floor, Los Angeles, California.

13 A. Absolutely --

14 Q. You see that?

15 A. -- yes.

16 Q. And that's where we are; right?

17 A. Yes.

18 Q. Okay. You see the date and time is
19 June 27th, 2019, at 10:00 a.m.

20 You see that?

21 A. Yes.

22 Q. And that is, in fact, around the time
23 that -- that is, in fact, the date today; right?

24 A. Yes.

25 Q. And that is around the time that this

1 deposition started; yes?

2 A. Correct.

3 MR. RILEY: Okay, great.

4 I'm going to note, for the record, that no
5 other parties are present here, including none of the
6 defendants and none of defendants' counsel, are here
7 at this deposition.

8 I'm also going to introduce into the record
9 and mark as Exhibit B, as in "bravo," this document.

10 Q. I don't have any questions for you on that,
11 but I just want to introduce this into the -- into
12 the record.

13 (Discussion off the record.)

14 MR. RILEY: Okay. Sorry about that
15 confusion.

16 So I'm going to introduce this -- this is
17 all one document.

18 A. Okay.

19 Q. And I'm going to mark this as Exhibit B, as
20 in "bravo."

21 (Deposition Exhibit B was marked for
22 identification by the court reporter.)

23 BY MR. RILEY:

24 Q. I don't have any questions for you on that
25 document. I just want it to be in the record to show

1 that the defendants in this case were provided notice
2 of today's deposition.

3 A. Three weeks ago.

4 Q. Mr. Schoenberger -- you can set that
5 document aside.

6 A. Okay.

7 Q. Mr. Schoenberger, have you ever been a party
8 to a lawsuit? And by that, I mean have you ever been
9 a plaintiff or the defendant in a lawsuit?

10 A. I have.

11 Q. Okay. And how many times have you been a
12 party to a lawsuit?

13 A. Twice.

14 Q. Okay. And can you tell me about those two
15 cases?

16 A. Yeah. I tried to take a restraining order
17 out on a woman who was a landlord. I was granted a
18 civil Temporary Restraining Order. She then violated
19 it.

20 I went to the judge, and the judge says
21 there's no repercussions. It was civil.

22 Q. Okay.

23 A. So --

24 Q. Is that -- is that one -- what you described
25 us one of the two cases or --

1 A. One.

2 And then there was another one with a man
3 named Ron Israel. And this concerned a thousand
4 dollars which I did not owe. I was being stalked at
5 the time. And the stalker who had threatened
6 violence against my family, his name was Steve
7 Lefler, L-e-f-l-e-r. Was a business dispute.

8 Q. Okay.

9 A. He said, if you go to court, I'll come up
10 and hurt your family.

11 And Mr. Israel has since said, I'll take it
12 back --

13 Q. Okay.

14 A. -- I'll -- I'll clear your name.

15 Q. Okay. Great.

16 And so in either of those cases, or in any
17 other -- in any other context or litigation, have you
18 ever testified in a deposition before?

19 A. No, I have not.

20 Q. Okay. So this is your first deposition.

21 A. (No audible response.)

22 Q. Okay. So I'm just going to go over some --
23 some instructions and some guides for how we can do
24 this for the rest of the day most productively.

25 I'm going to ask you, throughout the course

1 of the day, a series of questions. And I'm going to
2 ask you to answer those. As we've already
3 established, you'll answer those questions honestly.

4 If I ask you a question and you don't
5 understand part of it, just ask me for clarification.

6 A. Okay.

7 Q. Okay?

8 A. Sure.

9 Q. And otherwise, I'll assume that you
10 understood what the question was.

11 Is that --

12 A. Okay.

13 Q. -- fair?

14 A. Absolutely. Yeah.

15 Q. Okay. When I ask you questions and I'm
16 asking you to -- to testify truthfully, I'm not
17 asking you to speculate as to things that you don't
18 have personal knowledge of.

19 Do you understand that?

20 A. Absolutely.

21 Q. Okay. There may be situations where I ask
22 you to speculate. But if I do that, I'll be express
23 about it; okay?

24 A. Okay. Sure.

25 Q. During the course of the day, I sometimes

1 fall out of this habit, but we should both try to
2 speak slowly for the benefit of the court reporter
3 who's here.

4 Okay?

5 A. Sure.

6 Q. And I trust that she will let us know if, at
7 any point, we're speaking too quickly.

8 As I'm asking you questions -- also for the
9 benefit for the court reporter, and to make sure we
10 have a clear record -- wait till I'm done with the
11 question, and then I'll pause, and then you can
12 answer.

13 Okay?

14 A. Sure.

15 Q. Perfect.

16 Throughout the course of the day, I want you
17 to be comfortable. I know that you're recovering
18 from a cold and are a bit under the weather.

19 So if, at any point during the day, you want
20 to take a break, to get a cup of coffee, to get some
21 water, to take a rest, just let me know, and we'd be
22 absolutely happy to do that.

23 A. Sure.

24 Q. Okay?

25 A. Sure.

1 Q. At the end of the day -- I have a series of
2 questions that I want to ask you about various
3 events. And at the end of the day, I'll give you an
4 opportunity -- I'll give you a opportunity to
5 elaborate on answers or to provide any additional
6 information that you would like the parties to have.

7 But during the course of the day, what I'd
8 ask, is that you do your best to answer the question
9 that's directly presented to you.

10 Is that okay?

11 A. Absolutely.

12 Q. Great.

13 Mr. Schoenberger, where do you currently
14 reside? You can just give me the name of the city.

15 A. Venice.

16 Q. Okay. And for how long have you lived in
17 Venice?

18 A. Only a month.

19 Q. And before that, where were you living?

20 A. I was in Woodland Hills.

21 Q. Okay. And that's also in the Los Angeles
22 area?

23 A. It is.

24 Q. Right.

25 And how long were you in -- in

1 Woodland Hills?

2 A. A year.

3 Q. Okay. And before that, were you also in the
4 Los Angeles area?

5 A. I was in San Luis Obispo County.

6 Q. Okay. And how long did you live there?

7 A. From 2013 to 2018.

8 Q. Okay. And are you currently employed?

9 A. Self-employed, yes.

10 Q. Okay. And what -- what do you do? What is
11 your occupation?

12 A. I'm both a composer, classical music,
13 symphonies, operas, concerto -- concerto I hear
14 [sic]. And also, I'm working with a rather large
15 producer. We're -- we've -- we have a television
16 development deal so -- in the works.

17 Q. And do you mean by that, you're developing a
18 TV show?

19 A. We are -- yes. It's going to be a five-year
20 TV show.

21 Q. Oh, great.

22 What's -- what's the TV show about? If
23 you're able to say.

24 A. I can say.

25 It's basically a very complex 3-D puzzle.

1 The puzzle gets into arcane history, classical music,
2 prime numbers, higher mathematics. It's kind of an
3 intellectual pursuit.

4 Q. I take it the TV show doesn't have anything
5 to do with the issues involved in this -- the Rich
6 versus Butowsky litigation.

7 A. As a matter of fact, now that you brought it
8 up, Mr. Butowsky has a relationship with
9 Manuel Chavez, the Third.

10 Q. Mm-hmm.

11 A. Manuel Chavez, the Third, has actively
12 stalked me, attempted to break my rice bowl, stalked
13 my family --

14 (Reporter clarification.)

15 THE WITNESS: -- break my rice bowl. It's a
16 euphemism.

17 -- and called Sony to crush the deal with
18 Sony, which would've been six figures to me within a
19 couple years.

20 He also -- Manuel Chavez also stalked my
21 business partner. And I brought evidence of -- of
22 this today, if you wish to see it.

23 Q. Okay. We'll get to that later.

24 In terms of -- in fact, is -- when you say
25 "rice bowl," do you mean literally a rice bowl? Or

1 is that a -- a phrase that refers to something else?

2 A. It's a phrase concerning financial
3 prospects.

4 Q. In terms of the actual substance of the TV
5 show, or the production that you're developing, I
6 take it that that television show doesn't refer to
7 the issues in this lawsuit itself.

8 Does it?

9 A. Not at all.

10 Q. Are you -- are you familiar with a company
11 called "Shadowbox"?

12 A. I am.

13 Q. And what is Shadowbox?

14 A. Shadowbox is a defunct company. The
15 creators were myself and Beth Blackburn Bogaerts.

16 B-e-o- -- or o-e-g-a-r-t-s [sic].

17 The other two principals were Manuel Chavez,
18 the Third, and Trevor Fitzgibbon.

19 The company was dreamed up in July of 2017
20 and made active by October of 2017.

21 Q. And when you say "dreamed up," who -- who
22 dreamed up the concept of a company called
23 "Shadowbox"?

24 A. Me.

25 Q. Okay. And can you talk a little bit about

1 that? What was your conception for the --

2 A. Sure.

3 Q. -- for the company? What was --

4 A. Sure.

5 Q. What was it your --

6 Let me ask it this way.

7 What were you hoping to accomplish by
8 creating a company called "Shadowbox"?

9 THE WITNESS: If I can -- can we time out
10 for one second, please.

11 BY MR. RILEY:

12 Q. So are you -- just --

13 A. I'm going to get a lozenge.

14 Q. So I'm going to ask --

15 Oh, sorry. I thought you were --

16 A. No.

17 Q. -- looking for documents.

18 Okay. I get it.

19 A. I'm not going to do that to you.

20 Q. No, that's all fine.

21 A. I'll give you a good description.

22 I'm so sorry for this.

23 Q. I -- we'd be happy to take a break, if you
24 need it.

25 A. I'm just wondering. Do we -- do you have

1 honey tea or --

2 Q. We can -- we can find something.

3 Why don't we do -- why don't we do this.

4 Since there's a question pending --

5 A. Yeah.

6 Q. -- I just ask you to answer it --

7 A. Yeah.

8 Q. -- if you -- if you can, to answer the
9 question. And then we'll take a -- we'll take a --

10 A. Okay.

11 Q. -- break.

12 And the question -- let me restate the --

13 The -- the question was: Can you talk a
14 little bit about your conception of what Shadowbox
15 would be back in the summer of 2017.

16 A. I had fallen in love with a girl named Beth.

17 Q. Okay.

18 A. She had fallen in love back. She was
19 lending financial support to Trevor Fitzgibbon, who
20 had been accused of rape and then cleared by the
21 U.S. Attorney.

22 I had mixed feelings about Trevor because I
23 thought he was a -- well, I shouldn't speculate --
24 but the idea for me, I told Beth, there are people
25 being stalked online.

1 At that point maybe 40 percent of the world
2 was online. There are people of high net worth who
3 are being stalked, so why not identify who the
4 stalkers are, find out what their motivations are,
5 and then hook them up with defamation lawyers after
6 collecting the evidence.

7 So also, offer defense to -- to, you know,
8 to -- to show the stalkers and the attackers you've
9 got friends.

10 Q. Mm-hmm.

11 A. And they're going to say, no, don't do this.

12 Q. And -- and when you developed this idea for
13 a company, what did you do? Did you take it to other
14 people and -- and pitch them with the idea?

15 How did -- how did Shadowbox come into
16 existence?

17 A. Very interestingly. Trevor was told within
18 days of creating this concept -- Tara Fitzgibbon by
19 the way -- and he immediately got us in touch with
20 Ed Butowsky.

21 Ed Butowsky, at the time, was complaining
22 about being attacked by a huge, as he put it, DNC
23 machine, which included David Fokenflick of --

24 (Reporter clarification.)

25 THE WITNESS: Fokenflick.

1 F-o-k-e-n-f-l-i-c-k, I believe.

2 -- of NPR. He identified Chris Cuomo of CNN
3 as one of his detractors, saying deleterious things
4 about him in public.

5 And he complained, in general, that he was
6 being associated with Donald Trump as a personal
7 friend of Donald Trump's, and he said that wasn't
8 true.

9 We interacted with Ed. He agreed to hire us
10 as a client for \$20,000. It took five and a half
11 weeks for him to pay us.

12 BY MR. RILEY:

13 Q. Was -- so am I correct, then,
14 Mr. Fitzgibbons [sic] is the person who connected you
15 with Mr. Butowsky?

16 A. Exactly.

17 Q. And what's your understanding of how
18 Mr. Fitzgibbons had come to know Mr. Butowsky?

19 A. That is an unknown to me, Mr. Riley.

20 Mr. Fitzgibbon only said that he had some
21 sort of connection to him.

22 Q. Uh-huh.

23 A. So...

24 Q. Did anybody ever ask, how do you -- for
25 example, how do you know Mr. Butowsky? Or did

1 anybody try to get some background on the nature of
2 the relationship between Mr. Fitzgibbons and
3 Mr. Butowsky?

4 A. I did. I asked Trevor, and Trevor --
5 (Reporter clarification.)

6 THE WITNESS: Well, I asked Trevor
7 Fitzgibbon, how do you know him?

8 And his response was, I had a large PR
9 company. I know everybody.

10 BY MR. RILEY:

11 Q. Okay. And around -- and what was the time
12 period? Do you remember exactly when Mr. Fitzgibbons
13 introduced you to Mr. Butowsky?

14 A. Roughly last week of July 2017.

15 Q. Okay. At the time -- at that time, who were
16 the people who comprised Shadowbox?

17 A. That would have been Manuel Chavez, Trevor
18 Fitzgibbon, Beth Blackburn and myself.

19 We were also in touch with Hall Powell, who
20 is a New York writer, and he's produced things, and
21 Michael Levine -- Michael A. Levine, who is my
22 business partner with a -- with a television
23 development product.

24 These were not people who were formally with
25 the company at that point. It was the first

1 trimester.

2 Q. Were -- were you -- was Shadowbox formally
3 incorporated, in any sense, at that point?

4 A. We went through the process. And that was
5 achieved in October.

6 Q. Okay. Did -- did Shadowbox have any formal
7 employees at that point?

8 A. No.

9 Q. Okay. And so at that point, Shadowbox was
10 comprised of -- or strike that.

11 At that point, the people who were
12 associated with Shadowbox were you, Manuel Chavez,
13 Beth Blackburn, Hall Powell, and Michael Levine;
14 correct?

15 A. And Trevor Fitzgibbon.

16 Q. And Trevor Fitzgibbon.

17 Okay. I'm going to introduce a document as
18 Exhibit C, as in "Charlie."

19 (Deposition Exhibit C was marked for
20 identification by the court reporter.)

21 BY MR. RILEY:

22 Q. And let me know once you've had a chance to
23 review that document --

24 A. Yeah.

25 Q. -- Mr. Schoenberger.

1 A. This is one of a number of -- we were -- we
2 were attempting to get a mission statement.

3 This is one version of many. And for this
4 particular one -- and you can check with Hall. I
5 will give you Hall's thing.

6 Hall and I did not like some of the verbiage
7 in here. But as you can see -- like the sentence,
8 "We use targeted chaos to confuse your opponents,"
9 that seemed a little iffy.

10 There are -- I no longer have the ProtonMail
11 account associated with this, but he has everything.
12 And so we were -- and so does Michael. So I can get
13 you that.

14 But most of it is -- is correct.

15 Q. Okay. So -- so just to be clear, for the
16 record, this -- you -- you do recognize this --

17 A. I do.

18 Q. -- document.

19 Do you know when this document was created?

20 A. I think it would've been between August and
21 September of 2017.

22 Q. Okay. And who created this document?

23 A. This was -- a number of people created it.
24 We were all -- as I said, this was the birth of a
25 company, Hall Powell, who is also a writer and has

1 done a lot of -- lot of PR work in New York, he was
2 part of it.

3 Trevor Fitzgibbon had actually done the
4 original part.

5 I had added things in; Beth had added things
6 in; Michael Levine had added things in.

7 And so I believe that what -- I can ask
8 either Michael or Hall to forward me that whole
9 conversation with everybody.

10 Q. Okay. With respect to your knowledge,
11 sitting here today, I'm going to ask you about a
12 couple sentences --

13 A. Sure.

14 Q. -- in -- in the document.

15 So in the third paragraph, it says under --
16 there's a heading that says, "THIS IS WAR."

17 And it says:

18 "Shadowbox is your army. We solve your
19 problems and expose truth. We unleash a
20 multifaceted, strategic battle plan through
21 integrated research, earned media, legal, and digital
22 chaos."

23 Is that a -- a fair description of what
24 Shadowbox was intended to do as a company?

25 A. It -- it's exactly what it's not supposed to

1 do. I didn't like this. This is the problem that I
2 had. It was warlike.

3 It's one thing to say, you're under assault.
4 But as soon as you say "This is war" -- that was my
5 problem with it, and Hall and Michael.

6 You're basically saying we're going to be a
7 bad guy, too. Not smart.

8 Q. So what would've been -- how would you -- at
9 the time that Shadowbox was conceived in the summer
10 of 2017, how would you have described your mission
11 for the company?

12 A. Any interaction that we would've done with
13 adversarial components, would've been done telling
14 the truth, not creating digital chaos as it -- as
15 it's put.

16 Of course, there's going to be a chaotic
17 element when you're on social media, anyway. But
18 that was my problem with it.

19 And, you know, you have to understand from
20 Trevor's point of view. He'd been accused of rape in
21 December of 2015. And at the same time, he had four
22 employees accuse him of being overly forward with
23 women.

24 And he had, then, been attacked -- or called
25 out, I should say -- because I do believe what they

1 said about him. I don't believe the rape, but I do
2 believe he was -- treated women in a horrible
3 fashion.

4 And we'll get more into that in a second, if
5 you like.

6 I didn't like the -- the warlike language
7 that came from Trevor. Trevor had been under
8 assault. He was angry. He felt that his reputation
9 was ruined.

10 Q. Is -- was your concern with the type of
11 language that we're talking about here, that a
12 prospective customer of Shadowbox, would read this
13 and be left with the impression that they could hire
14 Shadowbox to generate a false narrative about one of
15 their targets?

16 A. Yes. Even though the word "truth" is in
17 there, this document could be perceived that, as
18 Ed put it, Ed wanted a militia for hire --

19 Q. Mm-hmm.

20 A. -- Kevin referring to us a "militia."

21 Q. And when did Mr. Butowsky make that
22 statement?

23 A. Multiple times, both on September 20th, I
24 believe, 2017, and then repeatedly from February 2nd
25 or 3rd, 2018, up until May 11th or May 12th, 2018.

1 Q. Okay. And we'll ask -- I'm going to have a
2 number of questions for you about those --

3 A. Sure.

4 Q. -- specific conversations in a bit.

5 So just so I'm clear about what your view of
6 this document is, is it if this document was
7 presented, as it's written here, to a prospective
8 customer, that it would leave [sic] that prospective
9 customer to believe that they could hire Shadowbox to
10 generate a false and aggressive campaign against one
11 of their targets?

12 A. Possibly. It's only a couple sentences
13 within a larger framework --

14 Q. Mm-hmm.

15 A. -- too. And, you know, this was a work in
16 progress. This was not going out to the public.

17 Q. Do you know if this document was ever
18 presented to Mr. Butowsky?

19 A. I did not present it to him. If anybody
20 did, that would've been Trevor.

21 Q. Okay. Is this document consistent with how
22 Shadowbox held itself out to prospective customers?

23 A. No.

24 Q. Did Mr. Fitzgibbons, at least, hold
25 Shadowbox out as providing the type of services

1 described in this document?

2 A. I certainly hope not.

3 Q. But he may have?

4 A. He could've. Sure. Absolutely.

5 Q. There's a -- and then, in the next sentence
6 down, it says:

7 "Where your enemies have lived to paint the
8 company as the bad actor, we sow the seeds of doubt
9 and present the counternarrative."

10 And then the sentence goes on.

11 That phrase "present the counternarrative,"
12 I take it that is something that Shadowbox was
13 designed to do, present the counternarrative for
14 people.

15 A. The way that Beth and I discussed this, was
16 those who would destroy us with lies will be
17 confronted by truth and, perhaps, not do well.

18 But -- but the whole idea was not -- was not
19 to bring down your enemies. It was actually to make
20 statements on social media that would age well and
21 that I -- while we're collecting and documenting
22 everything for future reference.

23 Q. Mm-hmm.

24 A. So the -- the point of the matter, really,
25 was not to go down the rabbit hole, but to develop

1 what is needed for a good defamation case.

2 For instance, in California, as you know,
3 with defamation, all you need to do is show
4 negligence, I believe. It's different from showing
5 animus.

6 So, you know, it -- it would be a
7 case-by-case basis. But literally, it was to go
8 ahead and say that's not true, you were lying --
9 that's not true, here is where you're falsifying
10 information. At the same time, screen-shot, collect,
11 you know, everything that you need to do. And then
12 we were --

13 You know, the company was new. We were
14 going to have a network of defamation lawyers --

15 Q. Mm-hmm.

16 A. -- too, people to refer business to. And I
17 thought it would've been a good model.

18 Q. So -- so if there was a narrative out in the
19 world, and a potential client wanted to present a
20 counternarrative, they could come to Shadowbox to
21 help generate that counternarrative; correct?

22 A. Yes. Within -- within reason.

23 Mr. Riley, it -- it was a new company. And
24 from the get-go, we were butting heads with each
25 other.

1 Q. Mm-hmm.

2 A. So the vision that -- that Ms. Blackburn and
3 I had was a lot different from Manuel Chavez and --
4 and from Trevor.

5 Q. And is that because of the vision that
6 Manuel Chavez and Trevor Fitzgibbons had was more in
7 line with the warlike mentality that's described in
8 this document?

9 A. Yes.

10 Q. Okay.

11 A. Absolutely.

12 Q. I'm going to show you another document.

13 And mark this as Exhibit D, as in "delta."

14 (Deposition Exhibit D was marked for
15 identification by the court reporter.)

16 THE WITNESS: Mr. Riley, can I add one more
17 thing?

18 BY MR. RILEY:

19 Q. Of course, yeah.

20 A. There was such friction developing with the
21 mission statement, that at this time, Ms. Blackburn
22 and I believed that Trevor and Mr. Chavez started a
23 company behind our back called Silent Partner IO,
24 without telling us.

25 Q. Can you talk -- what led you to have that

1 suspicion?

2 A. Ms. Blackburn told me, and she knew. She
3 had been supporting Trevor financially for a while.
4 She's independently wealthy. And she caught him in
5 some sort of lie. And then I -- I guess he confessed
6 to this.

7 Q. He -- he confessed to having established a
8 separate company called Silent Partner?

9 A. IO. Yes.

10 Q. And do you have an understanding of what
11 Silent Partner IO was doing? What their business
12 was?

13 A. He had said it was not with Manuel Chavez.
14 And I guess it was a PR company that he wanted to run
15 clandestinely, because his name had caught so much
16 flack.

17 Q. Mm-hmm.

18 A. So there was a woman -- I don't remember her
19 name. Perhaps you could ask Beth or --

20 Q. Mm-hmm.

21 A. -- or Trevor about this.

22 But there was a woman who introduced
23 herself, and she wanted to write this. So that was
24 part of the process.

25 As I said, let me go ask Michael or Hall. I

1 no longer have access to it. But I'll get it to
2 Mr. Gottlieb and --

3 (Reporter clarification.)

4 THE WITNESS: I'm going to get whatever I
5 can find with this woman and get it to your law firm.

6 BY MR. RILEY:

7 Q. Do you know whether Silent Partner IO had
8 business with Mr. Butowsky?

9 A. I don't know.

10 MR. RILEY: Okay. I'm going to --

11 THE WITNESS: That's a good question.

12 MR. RILEY: I'm going to mark -- mark this
13 as Exhibit D, as in "delta."

14 And, separately, my LiveNotes just went out.
15 It looks like the power source, here.

16 (Off record.)

17 BY MR. RILEY:

18 Q. Have you had a chance to review this
19 document, Mr. Schoenberger?

20 A. Yes.

21 Could I say one more regarding --

22 Q. Of course. Yeah.

23 A. There is a person named Arturo Tafiosky
24 (phonetic), who uploaded a video that was a reupload
25 from an interview that Beth Blackburn did with a man

1 named Nathan Stoltman, a YouTuber, where she even
2 mentions in audio that Manuel Chavez and this other
3 person, meaning Trevor, started this company.

4 And I -- I will find that and get that to
5 Mr. Gottlieb and Mr. Hall.

6 BY MR. RILEY:

7 Q. The document that you have in front of you
8 is Exhibit D, as in "delta."

9 Have you had a chance to look at this
10 document?

11 A. Yes.

12 Q. And do you recognize this document?

13 A. I don't.

14 Q. Okay. This appears to be another mission
15 statement for Shadowbox.

16 Is that your understanding of what this
17 document is?

18 A. Yeah. It looks better -- better written.
19 But we probably had five, six, seven, eight of these.
20 So I may not recognize this one, but it looks like it
21 was created around the same time.

22 Q. Do you know whether some version of
23 Shadowbox's mission statement was, at any point,
24 provided to Mr. Butowsky?

25 A. I don't know. I know I didn't provide

1 anything to him.

2 Q. Okay. About halfway down this page in the
3 fifth -- there's a series of lines. And in the fifth
4 line, it says "Ability to create campaigns."

5 Do you see that?

6 A. Yes.

7 Q. That is a fair statement of what Shadowbox
8 was intended to do; right?

9 A. No. Because it says "unfair practices."
10 That's not something that I would use. You know,
11 ability to create campaigns to protect clients, sure.

12 But unfair practices, that seems to be very
13 specific.

14 Q. Well, let me ask you: Was -- was one of the
15 services that Shadowbox was offering the ability to
16 create campaigns online?

17 A. Yes.

18 Q. Okay. And one -- and one of the services
19 that Shadowbox was offering was the ability to
20 generate counternarratives.

21 A. Yeah.

22 Q. Okay. In the next line down it says, "We
23 collaborate with legal" --

24 The next line down says, "We collaborate
25 with" --

1 The next line down says, "We elaborate with
2 legal teams for operations and defamation."

3 A. Yeah.

4 Q. Do you see that?

5 Do you have an understanding of what that
6 means?

7 A. No. It's so poorly written.

8 Can we do a time-out?

9 Q. Sure.

10 THE VIDEOGRAPHER: We are going off the
11 record at 11 o'clock.

12 (Short recess.)

13 THE VIDEOGRAPHER: We are back on the record
14 at 11:02 a.m.

15 BY MR. RILEY:

16 Q. We're back on the record.

17 Mr. Schoenberger, you understand you're
18 still under oath?

19 A. Yes.

20 Q. Okay. And we did not talk about the
21 substance of your testimony, at all, when we were off
22 the record; correct?

23 A. You did not.

24 Q. Right.

25 Before we took a short break, I asked you

1 about the sentence in the document that's marked as
2 Exhibit D, as in "delta."

3 "We collaborate with legal teams for
4 operations and defamation," what's your understanding
5 of what that phrase is a reference to?

6 A. That is probably a phrase written by Trevor
7 or someone else. It's not what I would have ever
8 written.

9 My vision in regard to the company, was to
10 collect evidence for future reference and to identify
11 defamation lawyers within the geographic locale of
12 the client for, you know, litigation.

13 Q. Yeah. And -- and one of the reasons you
14 wouldn't have written the sentence that way, is that
15 somebody could read that sentence and be left with
16 the impression that they could hire Shadowbox to
17 defame other people; right?

18 A. Exactly. Take a look at how it's written.
19 It's...

20 Q. Right. So --

21 A. It's horrible.

22 Q. So if I -- if -- if -- if Shadowbox's
23 mission had been presented to a potential customer by
24 saying that, "We collaborate with legal teams for
25 operations and defamation," a potential client could

1 look at that and think, I can hire Shadowbox to
2 defame my enemies; right?

3 A. Yeah.

4 I mean, it's -- you can make a lot out of
5 that sentence.

6 Q. Right. Right.

7 A. It's just so poorly written.

8 Q. Right.

9 And one of the interpretations is that
10 Shadowbox provides services to defame opponents.

11 A. Yeah.

12 Q. Right.

13 So you've mentioned a gentleman named
14 Mr. Ed Butowsky.

15 And just for the record, you're familiar
16 with Mr. Butowsky; correct?

17 A. Yes.

18 Q. Okay. And I understand that you came to
19 know Mr. Butowsky in the summer of 2017.

20 Correct?

21 A. Yes. Late summer.

22 Q. Okay. Do -- do you remember a precise date,
23 by any chance?

24 A. Spoke to him on the phone and also in video
25 conferencing, and then met him on September 19th,

1 2017.

2 Q. Okay.

3 A. So that's pretty late in the summer.

4 Q. Okay. So I want to -- and the -- and
5 September 19th is significant because --

6 Why is September 19th a significant date
7 that stands out for you?

8 A. He had provided airfare through Virgin Air
9 for myself out of, I believe, San Francisco.

10 Beth Blackburn already lived in Texas, in
11 the Sugar Land-Houston area. He flew Manuel Chavez
12 out of Arizona. And I believe that Trevor Fitzgibbon
13 was in Virginia.

14 Q. Okay. So I want to talk to you a bit about
15 the period of time from when you first came into
16 contact with Mr. Butowsky, to this meeting that
17 you're describing in Texas.

18 Can you talk a bit about your first
19 conversation with Mr. Butowsky.

20 Sorry. That's -- let me ask you this.

21 How did your first conversation with
22 Mr. Butowsky get arranged?

23 A. Through Trevor Fitzgibbon. I believe it was
24 a Zoom meeting.

25 Would you like to know my impressions of

1 him?

2 Q. Sure.

3 A. I believe he cried in the first meeting. I
4 think he went up and down. And I was left with the
5 impression that this man had been traumatized. I
6 felt sorry for him. He told me how unfair everything
7 was, how innocent he was, and I bought it.

8 So -- well, I can't speak for anybody else.

9 But, you know, he -- and -- looked, you
10 know, with his blue eyes and that face and said, you
11 know, they tore me to pieces on CNN. I'm being
12 attacked right and left. I'm getting death threats
13 for my family. My beautiful children are being
14 threatened. My -- my wife can't sleep at night.

15 So he definitely painted a picture of things
16 are desperate for him. Not financially.

17 He said I want to hire you guys. He said, I
18 like what I hear.

19 And that would've been -- Mr. Riley, I would
20 assume that would've been around the first of August.

21 It took -- it took weeks and weeks, maybe
22 five or six weeks, for him to pay.

23 Q. Mm-hmm.

24 A. We had other Zoom meetings during this
25 period.

1 Would you like to know my second impression?

2 Q. Sure.

3 A. The second impression, I saw anger. He
4 flashed anger, and he was very upset with things.

5 And then I started to mention the Seth Rich
6 family. And he talked about how Joel Rich had
7 rejected him.

8 And he said, all I was trying to do was help
9 this nice Jewish kid who got killed. I'm Jewish.
10 You know, trying to do the right thing. And, you
11 know, "The road to hell is paved with good
12 intentions." I remember that line, too.

13 But what I sensed about him is his physical
14 health was not good. And as far as his mental
15 health, I figured he was, as they say, triggered,
16 that he had been traumatized. And so in actuality,
17 it made me want to help him, too. He convinced me.

18 Q. The impressions that you're describing of
19 him from that phone call, sitting here today, do
20 you -- did you believe that those impressions that
21 you had then are accurate?

22 A. I think he's an actor. I think he's highly
23 intelligent. But I find him -- I don't trust him at
24 all.

25 Q. And so do you believe that your initial

1 impressions of him, from that phone call that you're
2 describing, were -- were incorrect?

3 A. Absolutely.

4 Q. I just want to talk through, sir, very
5 methodically here, how that conversation came into
6 existence and what was said during that conversation.

7 So how did -- so did Mr. Fitz- --
8 Fitzgibbons set up the -- the introduction to
9 Mr. Butowsky?

10 A. Yes.

11 Q. And what did Mr. Fitzgibbons tell you the
12 purpose of that initial conversation was going to be?

13 A. We were going to land a big client, and he
14 was the one bringing him to the table.

15 Q. Okay. And so this initial --

16 And so this initial meeting with
17 Mr. Butowsky was, in a sense, Shadowbox's opportunity
18 to pitch Mr. Butowsky for work.

19 A. Exactly.

20 Q. And Mr. Butowsky was a prospective client?

21 A. Exactly.

22 Q. And this was an opportunity for Shadowbox to
23 tell Mr. Butowsky what Shadowbox could offer him.

24 A. Exactly.

25 Q. Okay. And what -- what did you know about

1 Mr. Butowsky, going into that pitch meeting?

2 A. I -- Trevor had told me -- and I'm sure told
3 Beth and Manuel that -- Ed was a financial manager
4 for sports celebrities, that he was extremely wealthy
5 and extremely well-connected.

6 And he said, this is a pittance, you know,
7 what we're charging him. He said, we should charge
8 him 30,000.

9 And, you know, it seemed like \$20,000 was
10 well -- you know, a lot of money for what we would
11 provide.

12 And it ended up, when we received the money,
13 the first thing that Manuel Chavez is, he left to go
14 to festivals for 11 days, didn't do any other work.

15 Trevor disappeared. It was Beth and I who
16 worked 16 to 18 hours a day for that entire month.

17 Q. Mm-hmm.

18 A. I'm sure you'll subpoena her and get the
19 same answer.

20 Q. During -- the initial conversation with
21 Mr. Butowsky was conducted through Zoom?

22 A. Yes.

23 Q. Okay. And who was in that conversation?

24 A. Trevor Fitzgibbon, Beth Blackburn, Manuel
25 Chavez, myself.

1 Q. And Mr. Butowsky.

2 A. And Mr. Butowsky.

3 Q. Okay. How did the conversation start?

4 A. Trevor introducing Ed to us and Ed -- you
5 know, charm offensive; right? Joking, asking
6 questions, making sure that each one of us felt
7 special.

8 Q. Mm-hmm.

9 And -- and then, did Mr. Butowsky explain to
10 you the problems with which he was seeking help? Or
11 did somebody from Shadowbox give a pitch of the
12 services Shadowbox could offer?

13 How did that conversation start, in earnest?

14 A. He said, here's what I want you to do. I
15 want you to stop these people who are attacking me.
16 Made it very clear.

17 And I said, we can certainly do a
18 counteroffensive.

19 Both Beth and I were really clear in the
20 conversation that anything that goes out there, if
21 it's a lie, can hurt him in any future litigation as
22 a plaintiff.

23 Q. So -- so Mr. Butowsky said that he was
24 seeking help to stop the people who are attacking
25 him; correct?

1 A. Correct.

2 Q. And who is that? Did he explain anything
3 more about that?

4 A. He mentioned David Fokenflick from NPR. He
5 mentioned CNN.

6 And he said every day that he wakes up,
7 there's another liberal writer attacking him.

8 And then he said, I'm going to call
9 Chris Cuomo up and deal with him.

10 Which I guess he did, again, after the
11 interview that he had.

12 Q. Did Mr. Butowsky explain to you --

13 Did Mr. Butowsky explain to you why these
14 various people were attacking him?

15 A. In his words, he had tried to do the right
16 thing as a father, and that they had attacked him
17 because he had been a Fox commentator.

18 And he mentioned someone named Doug Wigdor,
19 who I believe is an attorney in New York.

20 And he said, Doug Wigdor is trying to take
21 down Fox.

22 So because he has been a contributor on Fox,
23 this is part of a [sic] overreaching plan to crush
24 all the Republicans.

25 Q. Did he explain -- did Mr. Butowsky explain

1 during that phone call that he was being attacked
2 because Mr. Butowsky had made false allegations
3 against Seth Rich and Aaron Rich?

4 A. He did not.

5 Q. Did he talk about -- well, so -- so was
6 Mr. Butowsky conveying to you, then, that he needed
7 help fending off attacks --

8 A. Yes.

9 Q. -- from liberals who wanted to take down
10 him [sic] because he was a contributor on Fox News?

11 A. Correct.

12 However, when we had the big meeting on
13 September 20th, he did make mention that Aaron and
14 Seth Rich had received \$50,000 from WikiLeaks, when
15 they had given a tease Dropbox, which is a partial
16 amount of the files.

17 And I asked him, how did you know this?

18 And he said, I have connections.

19 He then mentioned Sy Hersch and said
20 Sy Hersch had something to do with it.

21 Q. Okay. Did he disclose at that time that
22 Sy Hirsch had subsequently denied making the
23 statements that Mr. Butowsky was making?

24 A. No.

25 Q. So I want to go -- I want to go -- we're

1 going to get to that meeting in September. I want to
2 go --

3 A. Sure.

4 Q. -- back to this initial conversation.

5 So am I understanding correctly that during
6 that initial conversation, Mr. Butowsky said that he
7 needed help defending himself from attacks?

8 A. Yes.

9 Q. And Mr. Butowsky said that he was being
10 attacked by CNN and David Fokenflick and liberals.

11 A. Liberals and -- want to get the right
12 phrase -- and "a bunch of clowns on Twitter,"
13 quote-unquote.

14 Q. Okay. And the motive that Mr. Butowsky
15 ascribed to his attackers is that they -- was what,
16 exactly?

17 A. Was that their -- that they want to put him
18 out of business and that he was losing clients. He
19 said that.

20 So he said, I don't know how long I can keep
21 in business the way that it's going.

22 And he said, I had an unblemished track
23 record before this.

24 He then said his father was an important
25 figure with the SEC. And I think he was in charge of

1 either compliance or enforcement for the SEC.

2 Which I confirmed.

3 Q. And -- and did Mr. Butowsky explain why
4 these people, supposedly, had it out for him?

5 A. No.

6 What he said was that Rod Wheeler was,
7 quote-unquote, "an asshole."

8 He said, this guy is a out-of-work bum. He
9 couldn't get employment anywhere. I helped him out,
10 and he screwed me.

11 So this is that meeting on September 20th,
12 Mr. Riley.

13 Q. Mm-hmm.

14 A. It was a lot of, I've been screwed by
15 everybody, people stabbed me in the back, that kind
16 of feeling.

17 Q. So during this initial conversation,
18 Mr. Butowsky described that -- what we've been
19 talking about, Mr. Butowsky described that as the
20 problem he was looking for help with.

21 A. Exactly.

22 Q. Okay. And did he -- did -- when he was
23 describing the problem he was looking for help
24 addressing, did he mention Seth Rich?

25 A. A number of times.

1 Q. Okay. And what did he -- what did he say
2 about Seth Rich?

3 A. He said that Seth Rich and Aaron Rich leaked
4 the files to the WikiLeaks. He said they were paid
5 \$50,000. He said that it was a game changer for the
6 elections; that we dodged a bullet. That that evil
7 witch, Hillary, you know, would've ruined this
8 country.

9 And then he said, I'm glad Trump won. But
10 by the way, I don't know him.

11 He would rattle off how he was happy that
12 Trump won. But then he would say, but I've been
13 accused of being a family friend with Trumps, and I'm
14 not.

15 Q. Mm-hmm.

16 A. So...

17 Q. So Mr. Butowsky told you, during that first
18 phone call, that Seth Rich and Aaron Rich had been
19 involved in hacking the DNC emails?

20 A. Yes.

21 Q. Did he provide any evidence to support that
22 claim?

23 A. No.

24 Q. Did anybody ask him to provide evidence to
25 support that claim?

1 A. I did.

2 Q. And -- and what did you ask him, exactly?

3 A. I said, can you prove it?

4 He said not over the -- the phone, not on
5 Zoom.

6 Q. Did Mr. Butowsky explain that his -- the
7 people who supposedly were attacking him, were doing
8 so because Mr. Butowsky had made those allegations
9 publicly against Seth and Aaron Rich?

10 A. He did not, at all.

11 Q. Okay. So how did the topic of Seth and
12 Aaron Rich and their alleged involvement in the DNC
13 hacking come up during the course of this initial
14 conversation?

15 A. He had started to go into the Rod Wheeler
16 thing. And I caught that it had now deviated from
17 Fox News, that they were getting in because of
18 Fox News, suddenly they were going after him because
19 of -- of Seth Rich.

20 So that's -- he had mentioned, oh, well,
21 Aaron Rich is with Northrop Grumman and -- you know,
22 a defense company. And then he said he's got Deep
23 State ties.

24 Q. Did he -- did Mr. Butowsky offer any
25 evidence to support the proposition that Aaron Rich

1 had Deep State ties?

2 A. No.

3 Q. Did Mr. Butowsky say anything during this
4 initial conversation about a Fox News article that
5 had been retracted earlier that summer?

6 A. "Was it an article written by Melia
7 Zimmerman?"

8 I remember that.

9 Q. Okay.

10 A. Yeah. Yeah.

11 Q. What's your recollection of what
12 Mr. Butowsky said during this telephone call about a
13 Fox News article by Melia Zimmerman, describing
14 Seth Rich's alleged involvement in the DNC hacking
15 and the retraction of that article?

16 A. In that initial conversation, he only
17 brushed on it.

18 But in future conversations, he said she got
19 a raw deal. And he said it goes to the very, very
20 top. It goes to Murdock's sons.

21 Rupert Murdock.

22 And then...

23 Q. And when did Mr. Butowsky say that it went
24 all the way to the top?

25 A. It would've been in subsequent conversations

1 we had over the next six weeks.

2 Q. All right.

3 A. Mr. Riley, he had become a client of ours
4 from around August 1st. I met him for the first time
5 on September 19th, I think, late at night, when I
6 flew in.

7 But for six weeks -- we had actually been
8 paid for the first month. But we gave him two weeks
9 extra for free because the idea was he was flying us
10 to Dallas to open up his Rolodex so we'd have
11 clients.

12 Q. The -- he became a client on August 1st?
13 Yes?

14 A. August 1st, yeah. August 1st, August 2nd,
15 right around that time.

16 Q. And -- and sorry if I've asked you this
17 before.

18 But do you remember the precise date of this
19 initial Zoom conversation?

20 A. I don't.

21 Q. Was it -- how long before he became a client
22 did this initial Zoom conversation happen?

23 A. I think it happened right away. I think
24 he -- it could've even been earlier. It could've
25 been mid-July. I'm trying to recollect, as best as I

1 can.

2 Q. So it was in the last two weeks of July?

3 A. Yeah.

4 Q. Okay. So during that initial conversation,
5 am I understanding you correctly, that Mr. Butowsky
6 described the problem that he was looking for help
7 with as him being attacked by various people?

8 A. Yes.

9 Q. And did he -- what -- what happened after
10 that?

11 A. We were invited to come out to Dallas. He
12 said he wanted to meet us face-to-face. He did fly
13 us out there. And when we met him, we had a large
14 lunch in his living room and --

15 Would you like me to name some of the people
16 there?

17 Q. Yeah. I want to get -- I want to get to --
18 to that meeting.

19 But first, I just -- I want to understand
20 fully what happened in that first conversation.

21 So he -- Mr. Butowsky described the problem
22 that he was having. And then -- and then during that
23 conversation, what happened next?

24 For example, did -- did Shadowbox then say,
25 here's how we can help you solve the problem? Or --

1 A. Yes.

2 Q. -- did Mr. Butowsky say, here are the types
3 of services I'm looking for?

4 I'm basically asking you to walk me through
5 everything that happened during that first
6 conversation and everything that was said.

7 A. He said, I have an unblemished record. He
8 said, you know, these allegations against me need to
9 be countered.

10 Both Beth and I said, we can definitely help
11 you out with social media. And we can also put good
12 things about you. And can you please provide us with
13 endorsements from some of your celebrity clients.

14 That's what we asked him to do.

15 Meanwhile, Trevor Fitzgibbon said, you know,
16 let's go get those bastards.

17 Manuel Chavez said at the -- we should hit
18 these guys hard.

19 And what else did he say?

20 You've got -- Manuel Chavez says, you got
21 the entire DNC, who's weaponized against you. And he
22 said, I'll find out all the players, and we'll get
23 'em real mixed up.

24 Q. When Mr. Butowsky said that there were
25 allegations against him that needed to -- sorry.

1 Am I correct in understanding your
2 testimony, that Mr. Butowsky said that there were
3 allegations against him that needed to be countered?

4 A. Yes.

5 Q. And what -- did he describe what, exactly,
6 what those allegations were?

7 A. He said the allegations are that he's some
8 secret proxy for Donald Trump.

9 He said that there -- that -- that he's been
10 accused of trying to -- he was accused for -- for
11 being a good guy and trying to find the truth about
12 Mr. Green's murder. And so he said, they don't want
13 the truth. They want it hidden.

14 Q. Oh.

15 A. So...

16 Q. By "Mr. Green," you meant --

17 A. Seth.

18 Q. Mr. -- Mr. Rich.

19 A. Or Mr. Rich. I'm -- I'm sorry.

20 Q. And -- and then -- then -- so folks from
21 Shadowbox said, here -- here's some things we can do
22 to help.

23 You and Beth said, we can help you on social
24 media.

25 Mr. Fitzgibbons said, let's go get those

1 bastards.

2 Manuel Chavez said, we have to hit these
3 guys hard.

4 A. Yeah.

5 Q. Am I understanding that correctly?

6 A. Correct.

7 Q. Okay. And then -- and then, what happened
8 in that conver- -- during that conversation, what
9 happened next?

10 A. Then he said, okay, great. I -- I like what
11 I hear.

12 And I think it ended quickly. I think he
13 had to go -- during the Zoom conversations, he was
14 taking phone calls. So --

15 He's a busy guy.

16 Q. Do you remember who he was taking phone
17 calls from?

18 A. I didn't hear, and I didn't try to hear.

19 Q. Yeah. Is there a recording on that Zoom
20 conversation?

21 A. I do not have one.

22 Q. Okay.

23 A. You might want to ask Ed. I had heard later
24 that he records everything.

25 Q. Uh-huh.

1 How -- how long did the conversation last?

2 A. 10, 15 minutes.

3 Q. Okay.

4 A. Could've been longer.

5 Q. Do you remember what time of day it was?

6 A. No.

7 Q. Okay. Were all of the participants in the
8 meeting in different physical locations?

9 A. Yes.

10 Q. All right. And where were you during that
11 meeting?

12 A. Paso Robles.

13 Q. Okay. And is your understanding that
14 Mr. Butowsky was in Texas?

15 A. Yes.

16 Q. So -- so that meeting ended with
17 Mr. Butowsky saying he liked what he heard.

18 And was there a discussion about next steps
19 at that point?

20 A. He said he was going to hire us. And we
21 were excited. We got off the phone. And I think the
22 first thing that we did is, Beth and Trevor and I
23 talked in a conference. And we were excited. We
24 just landed our first client.

25 Trevor was going to be in charge of getting

1 the payment information from Ed, too.

2 And Trevor said that he'll probably be with
3 us for at least three months at \$20,000 a month.

4 Q. Had you discussed the terms of the
5 engagement during that Zoom call?

6 A. I don't remember. I think, perhaps, not.
7 It was, perhaps, Trevor's job to go there.

8 And by the way, can we do a timeout? Just
9 want to use the restroom really quickly.

10 MR. RILEY: Sure. Yeah. We can do it.

11 THE VIDEOGRAPHER: We are going off the
12 record at 11:32 a.m.

13 (Short recess.)

14 MR. RILEY: Are we ready?

15 THE WITNESS: We are ready.

16 THE VIDEOGRAPHER: Stand by.

17 Okay. We are going back on the record at
18 11:43 a.m.

19 BY MR. RILEY:

20 Q. Mr. Schoenberger, you understand that you're
21 still under oath; yes?

22 A. Yes.

23 Q. Yeah.

24 Before we went off the record -- before --

25 A. I'm sorry.

1 Q. It's all right.

2 Before we went off the record, we were
3 talking about the first conversation that you had
4 with Mr. Butowsky.

5 And during that first conversation, did
6 Mr. Butowsky mention Matt Couch?

7 A. I don't remember.

8 Q. Okay. During that first conversation, did
9 Mr. Butowsky mention Melia Zimmerman?

10 A. I don't think so.

11 Q. Okay. During that first conversation that
12 you had with Mr. Butowsky, did he mention somebody
13 named Admiral Lyons?

14 A. Yes.

15 Q. During the first conversation you had with
16 him, he mentioned Admiral Lyons?

17 A. It -- I'm not sure if it was the first
18 conversation. But he mentioned -- this was on --
19 this wouldn't have been the Zoom. This would've been
20 something afterwards.

21 And what he said is that he wrote something
22 for him and had him publish it. And that the old man
23 is a little soft in the head.

24 And he -- he -- he would've been -- I think
25 he said he's 90 or -- or -- or in his late 80s -- and

1 that he wrote something. I'm trying to think what it
2 was.

3 But he wrote an opinion piece for him. And
4 he said he has an arrangement with Admiral Lyons;
5 that whatever Ed writes, Admiral Lyons will -- will
6 say or publish.

7 Q. And when did this -- when did Mr. Butowsky
8 tell you these things?

9 A. I think he said it in a phone call to me
10 sometime in August. And then he said it again on the
11 20th at the meeting. And I think he showed me a copy
12 of it.

13 And I -- I looked at it, and I said,
14 powerfully written.

15 And he said, well, I wrote it for
16 Admiral Lyons.

17 Q. So you saw an article that Mr. Butowsky told
18 you he had written under Admiral Lyons' name; is that
19 correct?

20 A. Correct.

21 Q. Okay. How confident are you in your
22 recollection that you saw that article --

23 Sorry. Strike that.

24 And can -- do you specifically recall when
25 you saw that article?

1 A. It would've been on the day of the big
2 meeting, and that would've been September 20th, 2017.

3 Q. Okay.

4 A. I'm a hundred percent sure.

5 Q. Okay. And at that point, do you have an
6 understanding as to whether the article had actually
7 been published?

8 A. I think he said it had been published. You
9 know, I'm -- that's to the best of my recollection.

10 All I know is that he showed it to me, and
11 then he said, Admiral Lyons is a big name, he's a big
12 shot.

13 And then, he admitted that he wrote the
14 article.

15 And he said, I have an arrangement with him,
16 if I write something, he'll put his name on it.

17 So he was bragging about being the
18 ghostwriter.

19 Q. And so at that point, Mr. Butowsky had
20 ghostwritten an article under Mr. Lyons' -- or
21 sorry -- Admiral Lyons' name.

22 A. Yes.

23 Q. Okay. But you don't know whether the
24 article, at that point, had actually been published
25 anywhere; correct?

1 A. I don't. I have a faint recollection that
2 he showed me a Xerox copy, which led me to believe it
3 could possibly have been published.

4 Q. Okay. But it's also possible that what he
5 showed you was a draft of the article that would
6 subsequently be published.

7 A. Absolutely.

8 Q. What do you remember about that article?

9 A. Nothing, to be honest.

10 I remember it was well-written. And I
11 remember when he told me that he had written it, he
12 told me that the man was very old.

13 And I said, does he still have his marbles.

14 And he said, oh, he's not all there.

15 And I kept quiet. I remember thinking, you
16 know, this is a weird form of elder abuse, you know.
17 It was one of the small bricks of losing credibility
18 that Ed was going with me, too.

19 So I remember having a deleterious feeling
20 about it.

21 Q. Mm-hmm.

22 And -- and so the -- the first -- I just
23 want to make sure I'm understanding the sequencing on
24 this right.

25 So the first time -- when was the first time

1 you remember Mr. Butowsky telling you about
2 Admiral Lyons?

3 A. I think it was in the first or second Zoom,
4 he mentioned that he was championing Ed's cause. And
5 he had said that in a flurry of, I'm friends with
6 this person. He mentioned sports figures. You know,
7 he -- he was putting out there that he was a man of
8 influence.

9 Q. And then, Mr. Butowsky told you during the
10 course of one of these conversations that he had an
11 arrangement with Admiral Lyons, whereby Mr. Butowsky
12 would write material, and Admiral Lyons would put his
13 name on it.

14 A. He only mentioned Admiral Lyons' name on the
15 phone, in person. This is what he told me. I
16 remember his face. I remember he had the kind of
17 animated sneaky, did this (indicating). I remember
18 his face.

19 So he only mentioned Admiral Lyons in the
20 Zoom phone call. But in person, he told me, this is
21 what I do. And he said, we have an arrangement.

22 And my response to him was, are you sure
23 he's -- you know, is he all there? You know, is he
24 compos mentis?

25 Right?

1 He said, well, you know, he's a little soft.

2 And he kinda winked at me, too. And that
3 was where I had just a feeling that Ed is sneaky.
4 So...

5 Q. That conversation that you're describing
6 where Mr. Butowsky talked about his arrangement with
7 Admiral Lyons, and you had asked about Admiral Lyons'
8 mental capacities, am I -- am I correct that that
9 conversation occurred on September 20th of 2017, in
10 person in Texas?

11 A. To the best of my recollection --
12 recollection, it was absolutely that date.

13 Q. Okay. And was anybody else present for that
14 conversation?

15 A. I think there was a room there.

16 Q. Uh-huh.

17 A. It depends who was within earshot and
18 whether there were competing conversations going in
19 different areas.

20 There were at least seven or eight other
21 people in the room.

22 Q. There were seven or eight other people in
23 the room when Mr. Butowsky told you about his
24 arrangement with Admiral Lyons, whereby Mr. Butowsky
25 ghostwrite articles under Admiral Lyons' name?

1 A. Correct.

2 Q. And at that time...

3 Well, strike that.

4 So I'm going to -- I'm going to come back to
5 this meeting in September. I want to -- I want to
6 get a record of what happened --

7 A. Sure.

8 Q. -- between this initial Zoom meeting and
9 that meeting. I'll have more questions for you --
10 for you about -- about those specific events.

11 During that initial -- going back to that
12 initial Zoom conversation with Mr. Butowsky, did he
13 mention Sean Spicer?

14 A. No. I don't remember that name.

15 Q. Did he mention Steve Bannon?

16 A. He did list Steve Bannon as someone that he
17 knew.

18 Q. Mm-hmm.

19 During that initial conversation?

20 A. Yeah.

21 Q. Okay. After that initial conversation with
22 Mr. Butowsky -- so Mr. Butowsky, during that
23 conversation, said that he was going to hire you --

24 A. Us.

25 Q. -- hire Shadowbox?

1 And then what happened after that?

2 A. We started work immediately, and it took a
3 while to get paid. I remember that.

4 We were checking in with him. And he did
5 not like emails. I had a conversation with him one
6 day where I called him on the phone, and he said to
7 me, I don't like being a snail and leaving my slime
8 everywhere.

9 And he said, I'm a very, very private guy.

10 So I said, okay.

11 He would end up FaceTiming me. And it was
12 very important for him, when he was talking to me, to
13 see my face. And so we would have these
14 conversations. I suspected he was recording us, too.

15 And it -- it felt like he was a man who had
16 become overly paranoid, and that he suffered from
17 some sort of persecution complex.

18 Q. When you say that you're -- you suspected
19 that those FaceTimes were being recorded, what was
20 the basis of that?

21 A. He had said in other conversations, I record
22 everything, I capture everything.

23 So I figured that would have applied to our
24 conversations.

25 Q. How frequently -- I'm talking about the time

1 period from that initial Zoom call to the meeting in
2 Texas in September of 2017.

3 During that window, how frequently did you
4 communicate with Mr. Butowsky?

5 A. Trevor was the main source of
6 communications. I -- I would say, for myself, maybe
7 four or five times.

8 Q. Four or five times, total, during that
9 period?

10 A. Total. I think with Trevor, 20, 30, 40.

11 Q. Okay.

12 A. Trevor was the point man.

13 Q. I see.

14 And the conversations that you had with
15 Mr. Butowsky were all conducted over -- how were
16 those conversations conducted?

17 A. There were some phone calls that I remember.
18 There was -- if I remember, there was a Zoom, maybe a
19 week after we had started.

20 And he was saying, where's Manny?

21 "Manny," being Manuel Chavez.

22 Manny had taken off to a festival for
23 11 days after he got paid. So that would've been --
24 three weeks after, that would've put -- put us right
25 around August 20th or so.

1 Q. Okay.

2 A. So he was upset that Manny was not around.

3 Q. Mm-hmm.

4 A. Which we were, too, but we didn't want to
5 say anything.

6 Q. Do you have an understanding as to how
7 Mr. Fitzgibbons communicated with Mr. Butowsky
8 during -- during that time?

9 A. Encrypted conversations using Signal --

10 Q. Uh-huh.

11 A. -- too.

12 Q. And -- and why did they use Signal for those
13 communications?

14 A. That's a good question. It's a very good
15 question.

16 I think Ed wanted everything encrypted. And
17 Trevor, also, was very secretive --

18 Q. Mm-hmm.

19 A. -- too.

20 And so they wanted everything clandestine --

21 Q. Mm-hmm.

22 A. -- which struck me as weird, Mr. Riley.

23 Because here was Ed, on the other hand,
24 FaceTiming me. And so how can you be, you know,
25 seeking protection on one end, and then using an

1 app that is famous for being hacked?

2 (Reporter clarification.)

3 THE WITNESS: On -- on one hand, how could
4 you demand encrypted communications, and, on the
5 other hand, use applications that are easily
6 breached.

7 BY MR. RILEY:

8 Q. Generally your understanding is that
9 Mr. Butowsky desired to have all of his
10 communications encrypted and kept secret; yes?

11 A. Exactly.

12 Q. When you're referencing applications that
13 are easily hacked, was that reference to FaceTime?

14 A. Yeah.

15 Q. Okay. Do you have an understanding as to
16 whether FaceTime uses anti-encryption?

17 A. FaceTime does not. That's my understanding.

18 Q. Were there communications during this
19 period -- from that first Zoom meeting in late July
20 through the in-person meeting in Texas, during that
21 time frame, were there communications with
22 Mr. Butowsky conducted over e-mail?

23 A. I don't recall that. It -- although it
24 could've, Mr. Riley, I -- I will have to check.

25 The problem is, I no longer can access my

1 ProtonMail account. So I'll have to look into that.

2 But if it is, it's there.

3 Q. Okay. At the end of this first
4 conversation, in late July or early August of 2017,
5 did Shadowbox have an understanding as to what its
6 charge was from Mr. Butowsky?

7 Do you understand that question?

8 A. I do. I do.

9 Not completely. The reason being, is that
10 Mr. Butowsky was an emotional wreck, was going
11 through some physical issues as well; bad back, among
12 other things. And he wouldn't seem to be balanced.

13 As I said, there were times where he'd be
14 crying, and then other times where he was vengeful
15 and angry, and wanted to deliver vengeance to all his
16 perceived enemies, "if it's the last thing," quote,
17 "he does."

18 Q. Mm-hmm.

19 A. So...

20 Q. Did he say that at some point, that he
21 wanted to deliver vengeance to his enemies?

22 A. He told that to me.

23 He said, all these bastards are going down.

24 He would use colorful language.

25 He would fantasize about getting David

1 Fokenflick.

2 You know, he -- he wanted someone to visit
3 his office and scare him, traumatize him. So that
4 was a favorite theme of his, which is payback.

5 Q. Did he have -- did Mr. Butowsky ever talk
6 with you about exacting vengeance against the Rich
7 family?

8 A. Yes. Joel Rich. He was angry at Joel Rich,
9 and I never understood why.

10 But he said he got the ultimate insult, and
11 he was cutting Joel Rich down. He thought -- he
12 described Aaron Rich as a creep. And I think
13 described some interview where Aaron was smiling. I
14 don't know what that is about.

15 He saved a special place for Joel Rich.
16 There seemed to be a lot of anger.

17 And he would say, talk about ingratitude,
18 again and again and again. Talk about ingratitude.
19 You know, here I am, I -- I'm out of pocket. I spend
20 my own money, hire a detective, you know, getting to
21 the bottom of this. Because he was a nice Jewish kid
22 who gets killed, and look what happens to me. I'm
23 going through the ringer.

24 It was like a Rodney Dangerfield routine.

25 Q. And when did Mr. Butowsky say those things

1 to you? Do you remember?

2 A. He said these things to me on the 20th. And
3 then, in particular, after I moved there, which
4 would've been February 2nd or 3rd, 2018.

5 Q. So Ed -- when Mr. Butowsky said that -- so
6 am I getting this correct, Mr. Butowsky told you, at
7 some point, that Joel Rich demonstrated a lack of
8 gratitude toward Mr. Butowsky?

9 A. Exactly.

10 Q. And that upset Mr. Butowsky.

11 A. Yes.

12 Q. And Mr. Butowsky's view was that Joel Rich
13 should have been grateful to Mr. Butowsky because
14 Mr. Butowsky had hired a detective to investigate the
15 murder of Seth Rich; is that right?

16 A. Correct.

17 Q. Did Mr. Butowsky ever explain why, in his
18 view, Joel Rich was not, in fact, grateful for that?

19 A. No.

20 And I remember when I pressed him on it, he
21 said, I don't want to talk about I now.

22 But there was a sense that Joel Rich had
23 told him to go away.

24 Q. Did Mr. Butowsky ever tell you that
25 Joel Rich had instructed Mr. Butowsky to go away?

1 A. Could you ask the question again, please.

2 Q. Sure.

3 Did Mr. Butowsky ever report to you that
4 Joel Rich had instructed Mr. Butowsky to go away?

5 A. Yes. That's -- he -- he -- that's who he
6 was saying; that Joel Rich had cut communication and
7 wanted nothing to do with him.

8 He then said that he's going to find out
9 what's going on with Joel. And he said, the way to
10 track down a Jew -- and he is Jewish -- is, he said,
11 through synagogue.

12 And so I remember that statement, thinking
13 that's an unusual statement to make.

14 He did a [sic] interview at some point with
15 Cassandra Fairbanks, when she was with big league
16 politics. And there is a YouTube video where I think
17 he repeats something similar to that.

18 Q. Mm-hmm.

19 A. So...

20 Q. Did Mr. Butowsky ever explain to you that
21 the reason Joel Rich had asked Mr. Butowsky to stop
22 engaging with the Rich family was because
23 Mr. Butowsky was making false accusations against
24 Seth Rich and Aaron Rich?

25 A. He never explained that to me, but he has

1 made false accusations against me.

2 So I understand that fully. We can get into
3 that later, I'm sure.

4 But, no, he -- he never explained that. He
5 was a person who wanted to present to us that he was
6 an absolute victim, and he was an innocent victim.

7 Q. So Mr. Butowsky never explained to you that
8 the reason the Rich family wanted Mr. Butowsky to
9 stop interacting with them, was because Mr. Butowsky
10 had made false allegations against Seth Rich and
11 Aaron Rich.

12 A. That was never explained.

13 Q. Mr. Butowsky led you to believe that the
14 Rich family was simply ungrateful for genuine
15 assistance that Mr. Butowsky allegedly was providing
16 to the Rich family.

17 A. Even more than that, he had said that
18 they're hiding something.

19 So he said, not only are they ingrates, but
20 they're hiding things from me.

21 And I remember that in particular.

22 And I said, what do you think they're
23 hiding?

24 And he says, I'm gonna find out.

25 Q. Did he explain, at any point, why he thought

1 they were hiding something from him?

2 A. He said that he had gotten too close to the
3 truth. And so part of the hatred towards Joel Rich,
4 that I could see, was because he felt they were
5 hiding the truth, and he had paid to find out the
6 truth.

7 It seemed rather disjointed.

8 Q. Do you recall when this conver- -- these
9 conversations occurred?

10 A. This would've been on the 20th. And then,
11 there would've been subsequent conversations along
12 the same vein from February 3rd, on.

13 Q. Did Mr. Butowsky ever explain what he
14 thought the, quote-unquote, "truth" was that the Rich
15 family was hiding from him?

16 A. He did not. He just felt that they were
17 hiding something from him, and he had to find out.

18 He -- he told me, he said, I'm going to get
19 to it, no matter what.

20 Q. All right. I'm going to show you a
21 document --

22 What exhibit are we on?

23 I'm going to show you -- I'm going to show
24 you this document.

25 Are we at Exhibit E, as in "echo"?

1 THE REPORTER: Yes.

2 (Deposition Exhibit E was marked for
3 identification by the court reporter.)

4 BY MR. RILEY:

5 Q. And let me know when you've had a chance to
6 look at the -- review the document, Mr. Schoenberger.

7 A. Yes.

8 Q. So on the sec- -- is -- is it -- on the
9 second page, toward the bottom, there's a email
10 August 17, at 9:25 a.m.

11 Do you see that?

12 A. Yes.

13 Q. And it says it's from a T-H-S-T-G. Do you
14 see that?

15 A. Yeah. It's me.

16 Q. Is that you?

17 A. Yes.

18 Q. Okay. And the email provides a link for a
19 BuzzFeed article.

20 Do you see that?

21 A. Yes.

22 Q. And then, below that it says "stupid
23 BuzzFeed"?

24 A. Yep.

25 Q. Is this an email that you sent on

1 August 3rd?

2 A. Yes.

3 Q. Okay. And do you remember the circumstances
4 around you sending this email?

5 A. We were developing a collection of
6 everything negative on Butowsky.

7 Q. Right.

8 A. And the reason why it says "stupid Buzz-" --
9 "BuzzFeed," is that I had seen something inaccurate
10 with them in the past.

11 Q. Was there --

12 A. Not about Ed.

13 Q. I see.

14 A. Yeah.

15 Q. So there's nothing in the -- the BuzzFeed --
16 well, so attached to this email -- or enclosed with
17 exhibit, rather, is a -- a BuzzFeed article.

18 And is -- is this the BuzzFeed article that
19 was linked in -- in your email?

20 A. Yes.

21 Q. Okay. So there was nothing in this -- it --
22 was there anything in this particular article that
23 you thought was inaccurate, if you recall?

24 A. No.

25 Q. Okay. In the email chain, if you go up a

1 little bit further, about a quarter of the way down
2 the page, there's an email from you time-stamped at
3 10:37 a.m.

4 Do you see that?

5 A. The fact that he is -- slightly means
6 nothing --

7 (Reporter clarification.)

8 THE WITNESS: Yes.

9 BY MR. RILEY:

10 Q. You see that email, the 10:37 email?

11 A. Yes.

12 Q. Okay. And then the second line in that
13 email says:

14 "The fact that he is a target for trying to
15 help us, our family, is everything."

16 Do you see that?

17 A. Mm-hmm.

18 Q. And, "us, our family," is that the Rich
19 family?

20 A. Yes.

21 Q. Okay. And what did you mean by that, at
22 that point?

23 A. This is August 3rd, 2017. He was a
24 brand-new client. He basically said he was being
25 attacked in the media. So we were trying to figure

1 out, how do we help him.

2 So as you can see, the Bannon thing, I
3 recognize that. The -- what I didn't -- what I
4 missed in this article, was he called him a -- a good
5 friend.

6 Q. Who called who a good friend?

7 A. Ed Butowsky called Steve Bannon a good
8 friend, you know --

9 Q. And you didn't -- you -- you didn't -- that
10 didn't come to your attention at the -- back at this
11 point. You missed that?

12 A. I had missed that part of it.

13 But Ed had described before, you know, that
14 he -- that he knows Steve, not well.

15 That was in -- it probably would've been in
16 the Zoom or a -- or I had asked Trevor how well he
17 knows Steve Bannon, because I had a pretty creepy
18 impression of Steve Bannon.

19 Q. In the next passage up in this email, it
20 says:

21 "My buddy Randy, who I trust, speaks highly
22 of his work"?

23 A. Yeah.

24 Q. What's that a reference to? Who's Randy?

25 A. Randy is Randy Goldring. And that was a

1 quick thing where -- Randy Goldring is -- was with
2 Smith Barney. He's with Morgan Stanley now.

3 And he had just done a quick thing.

4 And he said, oh, well, you know, there's
5 nothing negative on him.

6 So that was -- you know, that was that.

7 But that was not an in-depth investigation
8 into him.

9 Q. And so at -- at this point -- is it --

10 Does this email confirm your recollection,
11 that by early August of 2017, Shadowbox had been
12 engaged by Mr. Butowsky --

13 A. Yes.

14 Q. -- as a client?

15 Yes?

16 A. Yes.

17 Q. Okay. At that point -- at that point were
18 you aware that Fox News had, a few months prior,
19 retracted an article by Melia Zimmerman, alleging
20 that Seth Rich had been involved in hacking the DNC
21 emails and transferring those to WikiLeaks?

22 Were you aware, at this point, that that
23 article had been retracted?

24 A. Probably not, Mr. Riley.

25 But within a month, I was aware.

1 Q. Okay.

2 A. And what I was told by Ed is that
3 Ms. Zimmerman was still getting paid, but that there
4 had been a retraction. And as Ed put it, because the
5 Murdock sons were involved.

6 Q. You said within a month, you became aware of
7 the retraction of the Melia Zimmerman article.

8 A. Mm-hmm.

9 Q. How did that come to your attention?

10 A. Ed mentioned it. And he talked about it
11 with me over the phone at some point. And then
12 roughly three, four weeks after that, I met Melia.
13 She was at the meeting in -- in the room on the 20th.

14 And she told Beth and I that she had been
15 given a timeout, and that the article had been
16 retracted.

17 Q. And when you said Ms. Zimmerman was still
18 getting paid, what was -- what did you mean by that?

19 A. That Fox News was still paying her salary,
20 but that she was not getting any active assignments.
21 That was her complaint.

22 And she said at that point, that she might
23 moved to OANN -- which is One America News Network.
24 And evidently Ed knew the founder or the -- or the
25 CEO of One America News.

1 Q. Okay. I'm going to come back to your
2 conversation with Melia Zimmerman on September 20th
3 in a few minutes.

4 But first, you said that Mr. Butowsky told
5 you about the retraction of the Melia Zimmerman
6 article during a telephone call.

7 Do you recall when that telephone call
8 happened?

9 A. It would've been maybe the first part of
10 September.

11 Q. All right.

12 A. It was after he became happy with the work
13 that Beth and I did.

14 Q. Okay.

15 A. And so we had had some sort of impact, a
16 good impact. And so he gravitated towards us.

17 He was not really happy with Manuel Chavez,
18 because Manuel Chavez had taken off for the first 11
19 days when the job started.

20 Q. And what did Mr. Butowsky tell you during
21 that telephone conversation about the Melia Zimmerman
22 article?

23 A. He said oh, Melia and I are the best of
24 friends. He said the Murdock sons, Rupert -- Rupert
25 Murdock's sons, were behind the move.

1 And then he said, Rupert Murdoch's sons are
2 liberals. They're wolves in sheeps' clothing.

3 And that's that.

4 Q. Did he say that Rupert Murdoch's sons were
5 behind the move to retract Melia Zimmerman's article?

6 A. No. He didn't tell me who was behind it.

7 But he said they're the ones who are keeping
8 her out of the game. They're the ones who are
9 keeping her from writing.

10 Q. What was the context in which -- what was
11 the context in which Mr. Butowsky told you about the
12 Melia Zimmerman article?

13 A. Because he was very irate at Fox. He felt
14 that they had abandoned him in some way.

15 He said, I've been a contributor for years
16 and years and years. And he said, it's Rupert's sons
17 who are behind this.

18 Q. And why was he telling you all of this? Was
19 he looking for your help in some way?

20 A. Just ranting.

21 Q. All right. Did he say whether he had any
22 involvement with the Fox News article that had been
23 retracted?

24 A. I don't recall.

25 Q. Uh-huh.

1 He -- and -- and how did he describe his
2 relationship with Melia Zimmerman?

3 A. I take that back. I do recall.

4 Q. Yeah?

5 A. It's coming back.

6 Yes. He said he interacted with her. And I
7 guess she had also interviewed Rod Wheeler. That's
8 what I remember.

9 Q. Did Mr. Butowsky say that he had provided
10 Ms. Zimmerman with information for her to use in the
11 article?

12 A. Yeah.

13 Q. Okay.

14 A. And I'm going to have a -- I'm going to ask
15 a big favor.

16 Q. Yeah. Sure.

17 A. Can we take like a five-, ten-minute break?

18 Q. Sure.

19 A. Is that okay?

20 Q. Yeah, of course. Yeah.

21 A. Okay.

22 Q. Yeah.

23 THE VIDEOGRAPHER: Okay. So we're going off
24 the record at 2:20.

25 THE REPORTER: At 2:20?

1 THE VIDEOGRAPHER: I'm sorry. 12:20.

2 (Short recess.)

3 THE VIDEOGRAPHER: Ready?

4 MR. RILEY: Yes.

5 THE VIDEOGRAPHER: We are back on the record
6 at 12:28.

7 BY MR. RILEY:

8 Q. Mr. Schoenberger, you understand you're
9 still under oath.

10 A. Yes.

11 Q. And just for the record, I'm -- am I correct
12 that during the breaks that we've taken today, you've
13 not discussed your testimony with anybody, including
14 the -- the folks who are present here?

15 A. I've made no phone calls, and I will
16 continue to no communication.

17 Q. And -- and to be clear, we haven't discussed
18 the substance of your testimony, at all, today --

19 A. Not at all.

20 Q. -- off the record; right?

21 I'm going to introduce the next exhibit. I
22 think we're at F, as in "foxtrot"; is that right?

23 THE VIDEOGRAPHER: Yes.

24 Last one was E.

25 ///

1 (Deposition Exhibit F was marked for
2 identification by the court reporter.)

3 BY MR. RILEY:

4 Q. Mr. Schoenberger, let me know once you've
5 had a chance to review that document. I have only
6 just a couple questions about it.

7 A. (Witness complies.)

8 Yep.

9 Q. Do you see the -- the last email on this
10 thread is -- the subject says, "My talk this
11 afternoon is dated August 9th, 2017," at 4:08 p.m.

12 Do you see that email?

13 A. (No audible response.)

14 Q. It's on the second-to-last -- it starts on
15 the second-to-last page.

16 A. And it's from a Hall Powell, who is using
17 Coyote Rio.

18 Q. So that was my first question. Coyote Rio
19 is an email handle that's used by Hall?

20 A. Yes.

21 Q. What was Hall's last name, again?

22 A. Powell. P-o-w-e-l-l.

23 Q. And you see in the -- the email above that,
24 the next one up in the chain --

25 A. Uh-huh.

1 Q. -- it's -- it says it's -- it's dated
2 August 9, 2017, at 4:35 -- or sorry -- 4:32 p.m.

3 Do you see that?

4 A. Mm-hmm.

5 Q. And it's from Defango?

6 A. Mm-hmm.

7 Q. Who's Defango?

8 A. Defango is Manuel Chavez.

9 Q. And he writes:

10 "Protecting yourself is going to be key.
11 Any contact needs to be done over ProtonMail. Never
12 use a phone other than a landline for calls. It's
13 best to run a cell phone out of signal."

14 You see that?

15 A. Yeah.

16 Q. Okay. And does that confirm your
17 understanding that Mr. Butowsky instructed Shadowbox
18 to use only encrypted and private communications for
19 work that Shadowbox was doing for Mr. Butowsky?

20 A. Yes. And he called it "dark ops," to be
21 invisible.

22 Q. Okay. And -- and in the email above the one
23 we were just looking at, it's -- it's dated August 9,
24 2017, at 7:56 p.m. It's from TStGermain@ProtonMail.

25 Is that you?

1 A. That's me.

2 Q. Okay. You wrote:

3 "I agree with everything Manny just said.
4 Manny and I will be running dark ops."

5 Do you see that?

6 A. Yes.

7 Q. And what is dark ops a reference to?

8 A. Dark ops is being invisible and watching --
9 you -- you go dark. So it's dark operations which
10 are observable. You -- you lurk, essentially. You
11 watch; you don't engage.

12 Q. And what did you mean when you said, "Manny
13 and I will be running dark ops"?

14 A. Because what we would be doing would be
15 scraping the Internet, looking for anything negative.
16 If there was a campaign of people speaking poorly
17 about Ed, we would be invisible. We would watch and
18 wait. We wouldn't engage with them.

19 So dark ops is anything that's invisible
20 and. It's like a listening post.

21 Q. And what's the benefit of doing that?

22 A. When you engage with someone, they're
23 obviously going to know who you are. And they're --
24 and what I wanted to do, was get enough evidence of
25 defamation and stalking so that could be something

1 that could be taken to an attorney and a lawsuit
2 initiated.

3 Q. And you were looking for defamatory
4 statements made about Mr. Butowsky?

5 A. Yes.

6 Q. Did you find any such statements?

7 A. No. What's troubling me about it is, people
8 were stating an opinion. It's their Fourth Amendment
9 right and First Amendment, right of free speech. And
10 then you had journalists who were allowed to do what
11 they were doing.

12 So we didn't -- I personally didn't see
13 anything that really -- it was enough to get people
14 upset. But it wasn't anything that crossed the line
15 into stalking. There was no threats of, I'm going to
16 kill you, which Ed had said repeatedly he's getting
17 death threats. That's what we were looking for.

18 We were looking for something that would be
19 legally actionable, that we can get the police
20 involved, or something that crossed lines and became
21 absolute defamation of character.

22 Q. And then your email:

23 "Manny and Beth both mentioned prepping Ed
24 for a short video that we can script and edit."

25 Do you have a recollection of what that's a

1 reference to?

2 A. Yeah. We felt that Ed was not doing himself
3 a favor, breaking down and crying during phone calls.
4 And we wanted him to be clear and to basically say,
5 this is me, I've got -- I -- I was at Morgan Stanley
6 prior to starting my own firm. I was trying to help,
7 and I'm being attacked.

8 So we wanted to put a PR effort. And that's
9 why we were talking with -- with -- with Hall,
10 because Hall is a brand strategy expert.

11 And so we didn't like the way -- at least I
12 didn't like the way that Ed would, by that time,
13 become weepy and then angry.

14 We felt an evenness was -- was needed.

15 Q. Was it your understanding at the time that
16 Mr. Butowsky was, in fact, just simply trying to help
17 the Rich family uncover who had murdered their son?

18 A. Yes.

19 Q. Were you aware at that time that -- that
20 Rod Wheeler had filed --

21 Or I'm sorry.

22 Let me ask this: Were you aware at the time
23 of these emails about the Fox -- that the Fox News
24 article by Melia Zimmerman had been retracted?

25 A. No.

1 Q. All right. Were you aware at the time of
2 these emails, that Rod Wheeler had filed a lawsuit --

3 A. No.

4 Q. -- against Fox News or Melia Zimmerman?

5 A. No. I only learned that in September.

6 Q. All right. So at the time of this -- at the
7 time of -- at the time that Mr. Butowsky engaged
8 Shadowbox, at the time you guys began working for
9 Mr. Butowsky in early August, you were under the
10 impression that Mr. Butowsky was simply trying to
11 help the Rich family --

12 A. Yes.

13 Q. -- solve their son's murder?

14 A. Yes.

15 Q. Okay. At some point, that understanding
16 changed for you?

17 A. Yes.

18 Q. And what point was that?

19 A. When he started to express personal animus
20 towards Joel Rich. And my feeling was this is the
21 father of a murdered son. And it seemed disingenuous
22 of Ed to be complaining, on one hand, that his family
23 is being harassed, and then he's mocking this man for
24 feeling the same way.

25 Q. At some point did you come to understand

1 that what Mr. Butowsky's agenda actually was, was to
2 promote the allegations that Seth Rich and Aaron Rich
3 had been involved in hacking the DNC emails?

4 A. That was a constant. He said it repeatedly.
5 He would not say how he knew. And I asked him a
6 number of times.

7 But he told the same story, which was that
8 they were paid \$50,000 after Dropboxing a teaser.

9 And when I asked him, what is a teaser, he
10 said, just enough to whet their appetite. And so
11 that was that. He mentioned specifically \$50,000.

12 And then -- I'm recalling other things right
13 now. You're going to like this. Strike that.

14 He said, is there any way to get into their
15 bank accounts?

16 Q. Umm.

17 A. He said, could you -- you know, is there any
18 way to do that?

19 Q. And when did he say that?

20 A. That would've been on September 20th.

21 Q. Okay.

22 A. Absolutely.

23 Q. How did that -- how did that specific
24 request or inquiry arise?

25 A. It arose when we were having a conversation,

1 you know, with a big table. And he was asking us
2 questions. And he asked that question to Manuel and
3 I and possibly Beth. It was in that part of the
4 table.

5 And I said, no. I said, you know, the banks
6 protect this. And I said, that's a crime.

7 And so along with the other refusals I did
8 that day, he ended up calling me Dudley Do-Right in a
9 very derogatory fashion.

10 Q. Because what he wanted -- am I correct that
11 Mr. Butowsky wanted the people that he had hired to
12 break into Aaron Rich's bank account?

13 A. Yes.

14 Q. So this -- the exhibit that's in front of
15 you --

16 A. Yes.

17 Q. -- Exhibit F, it says -- it talks about --
18 it talks about Matt Couch.

19 You see that?

20 A. In which area?

21 Q. So on the second page, there's an email that
22 says subject: "Follow this guy."

23 About halfway down on the second page,
24 there's an -- there's an email. The subject line is
25 "Follow this guy," August 9th?

1 A. Yeah. And that's from Trevor, VoxVeritas.

2 Q. VoxVeritas is Trevor.

3 Had you heard about Matt Couch before this?

4 A. No.

5 Q. Do you know why Trevor Fitzgibbons was
6 instructing the others at Shadowbox to follow
7 Matt Couch?

8 A. No. Not when he wrote it. But then, he --
9 we were talking frequently at that time. And he
10 called me up, and he told me that Matt Couch is the
11 lead investigator now for Seth Rich.

12 And I think right around the same time is
13 when I started talking to Matt. However, my
14 conversations with Matt were always him waiting for
15 money from Ed, too.

16 He would talk about Seth Rich and frankly,
17 Mr. Riley, warned me of what I -- you know -- I just
18 felt that he was on a one-track mind with -- with
19 Seth Rich; that that was his entire life, too.

20 So he had started -- he was a -- he was a
21 Trumpster.

22 And we had some philosophical conversations
23 where, you know, I -- I told him I'm libertarian.
24 I -- I don't necessarily pick any side.

25 He seemed to be very, very bright. We had

1 discussed possible other business ventures outside of
2 the Seth Rich thing, which -- with Shadowbox we
3 didn't -- at least I didn't envision it, nor did
4 Beth, as being reputation defense. We wanted to do
5 other things. We were talking, at that point, about
6 doing positive things, and which we ended up doing
7 for the last two clients.

8 Already we were helping Ed and working
9 pretty tirelessly, but starting to formulate what
10 could be our market. And that's something that's
11 pretty natural in startups.

12 Q. When you referenced two clients, were those
13 two clients Fitzgibbons and Butowsky?

14 A. No.

15 Q. Who were the two clients?

16 A. It was Rabbi Andrew Paley --

17 (Reporter clarification.)

18 THE WITNESS: Rabbi Andrew Paley.

19 Rabbi Paley -- would you like me to look in my phone
20 to get you his email?

21 BY MR. RILEY:

22 Q. No, not -- not now. But we -- we may ask
23 you to do that --

24 A. Okay.

25 Q. -- as part of a formal document request.

1 A. Okay.

2 Rabbi Paley, I had -- we -- we were
3 introduced through Ed. And what he wanted, he was
4 not happy in his synagogue. And he wanted a greater
5 reach online where he had a website called "Ask Rabbi
6 Paley," I believe.

7 So it was to broaden his reach interfaith.

8 Q. Mm-hmm.

9 A. He wanted to reach out to the Christian
10 community and to the Muslim community. He was the
11 rabbi for the Dallas Police Department.

12 Q. Mm-hmm.

13 And the -- so Rabbi Paley was one client,
14 and Ed Butowsky was your other client?

15 A. No, no.

16 Ed was our first client.

17 Q. Mm-hmm.

18 A. Bo Dietl was our second client. Our third
19 client was Rabbi Paley. And then our fourth client,
20 Marty...

21 I'll have to remember his last name.

22 Q. You said -- when you're describing the
23 conversations you had with Matt Couch, you said that
24 Matt Couch was always waiting for money from Ed.

25 Do you remember saying that?

1 A. Yeah. He --

2 Q. What did you mean by that?

3 A. That Ed had made a promise of money to Matt.

4 And Matt kept on saying, I don't know if
5 this guy's real.

6 And I said --

7 And this went on for a while. I think by
8 end of August, we had been paid, so I told him that.

9 And then, he would call up and was
10 frustrated.

11 He would say, you know, this guy hasn't paid
12 me.

13 Q. So am I correct that in August of 2017, you
14 had conversations with Matt Couch in which Matt Couch
15 said that he was waiting for money from Ed Butowsky?

16 A. Yeah.

17 Q. Do you have an understanding as to what
18 Ed Butowsky was paying Matt Couch to do?

19 A. I think to investigate the Seth Rich murder.
20 I think that Matt Couch had replaced Rod Wheeler.

21 Q. What's your basis for that understanding?

22 A. He had said that to me.

23 Q. Mr. Couch told you that?

24 A. No. Ed.

25 Q. Mr. Butowsky.

1 What exactly did Mr. Butowsky tell you about
2 his relationship with Matt Couch in August of 2017?

3 A. He said, Matt is going to take it to the
4 finish line.

5 And then this was later in August, and he
6 had cut down Rod Wheeler.

7 He said Rod wasn't for prime time. Man has
8 personal problems.

9 I seem to recall that he might even have
10 said, well, maybe he has a drinking or a drug
11 problem.

12 And he said, when Rod Wheeler came to me, he
13 was flat broke and dialing for dollars.

14 Q. Did Mr. Butowsky say that he was paying
15 Matt Couch to replace Rod Wheeler?

16 A. Yes.

17 Q. Did Matt Couch tell you anything about the
18 details of his relationship with Ed Butowsky at that
19 point?

20 A. He told me that he had talked back to Ed and
21 put him in his place. He told me that he's
22 autonomous and that he's not going to let Ed trick
23 him.

24 Q. But Matt Couch was receiving money from
25 Ed Butowsky?

1 A. Matt Couch had not received money yet. He
2 hadn't received any money. That was his frustration.

3 Q. At some point, though, Matt Couch did
4 receive money from Ed Butowsky?

5 A. I don't know.

6 Q. Was your understanding that Ed Butowsky had
7 offered to pay Matt Couch to, quote-unquote,
8 investigate Seth Rich's murder?

9 A. I can't say that, Mr. Riley.

10 What I can say is that -- that Matt Couch
11 said he had been promised money by -- by Ed.

12 Q. Okay. This is -- this is what I'm -- this
13 is what I'm getting at.

14 So -- so Matt Couch told you that he had
15 been promised money by Ed Butowsky to investigate the
16 Seth Rich murder.

17 A. Yes.

18 Q. Okay. And -- and Matt Couch told you that
19 in August of 2017.

20 A. Yes. And there's more.

21 Ed, at that point, has said, I want you guys
22 all part of my team.

23 At one point there was a wounded veterans
24 organization that wanted to sell coins, you know,
25 the -- the -- I forgot what you call it. But it's

1 part of a fund-raising thing.

2 So Matt and I had engaged with a potential
3 customer there that had nothing to do with Seth Rich.
4 It didn't work out.

5 But at this point, Ed was opening up his
6 Rolodex and saying, maybe you guys can do this.
7 Maybe you guys can -- can do that.

8 So Matt would definitely remember those
9 interactions. Matt had told me that he had worked, I
10 believe, at Walmart with distribution, getting retail
11 traction into the other Walmarts.

12 And it's a little fuzzy, Mr. Riley, but I
13 definitely remember we spoke, and we even spoke with
14 a potential client, too.

15 And I remember that it took Matt five days
16 to get back to this client. And then his heart was
17 not in it.

18 Q. Do you know how much money Matt Couch had
19 been promised by Mr. Butowsky to continue to
20 investigate the Seth Rich murder?

21 A. I don't. I seem to recall \$5,000.

22 Q. When did Mr. Couch -- or the -- in the
23 conversation where Mr. Couch told you that he had
24 been promised money by Ed Butowsky to, quote-unquote,
25 investigate Seth Rich's murder, was that -- was that

1 conversation by telephone --

2 A. Yes.

3 Q. -- or --

4 It was by the telephone call?

5 A. Yeah. More than one.

6 Q. Okay. And who -- was it just you and him on
7 those phone calls?

8 A. Yes.

9 Q. Okay. And what was the con- -- why were you
10 having phone calls with Matt Couch at that point?

11 A. Matt Couch was going through what seemed to
12 be a financial crunch. He was saying he really
13 needed the money from Ed. He had kids to feed, too.

14 I liked Matt. I -- I -- I thought Matt was
15 funny. You know, he -- he never, ever -- Matt never,
16 ever indicated he would do anything illegal. He made
17 that clear.

18 He said, you know, I don't break the law.

19 We had that conversation. So I -- I've --
20 I've him.

21 You know, he was asking me, what do you
22 think of Ed?

23 And this was later in August. And I was
24 starting to feel that Ed maybe, you know, wasn't
25 telling the whole truth. So...

1 Q. What was it that gave you the impression
2 that Ed was not telling the whole truth?

3 A. I think the anger that he started to show
4 towards Joel Rich; the fact that his main complaint
5 was that his family is being victimized, but somehow
6 he lacked the empathy for Joel Rich's family, you
7 know, to go -- to go through what they've been
8 through.

9 And it just seemed like he didn't want his
10 privacy invaded, but he had no problem with Joel Rich
11 having his privacy invaded.

12 Q. Did you come to a point where your
13 understanding was that Ed Butowsky's real motivation
14 was not to help the Rich family solve Seth Rich's
15 murder, but, rather, to promote allegations that
16 Seth Rich and Aaron Rich had hacked the DNC emails?

17 A. That's exactly what I felt with the
18 September 28th meeting.

19 What -- what -- it showed us that he had an
20 agenda.

21 Q. So let's talk about this September 20th
22 meeting.

23 A. Great.

24 Q. How did this meeting come to pass?

25 A. Ed had said he wanted to meet us in person.

1 And so he arranged the flights. I think it was
2 either Virgin or Alaska Air. He used his frequent
3 flier miles to fly us out there.

4 And when we met -- I think I flew in last.

5 My vague recollection is that I showed up
6 at -- I -- maybe at a restaurant or Ed's country
7 club, and I was late.

8 My interest that evening was Beth, for
9 obvious reasons.

10 And so we circled back to the hotel. And
11 then we prepared to meet Ed the next day.

12 When we met Ed the next day, I think we met
13 right around 11 o'clock a.m. I believe that Ed drove
14 Manuel Chavez and my -- me to his house --

15 Or no. Maybe he drove me. Trying to think.
16 No, he drove us.

17 Manuel drove out to Texas in late January.
18 But at that meeting, we all took airplanes.

19 Q. Mm-hmm.

20 A. So I think -- I think he drove us.

21 Q. Okay.

22 A. Yeah.

23 Q. Drove you -- drove you to his home?

24 A. Yes. From the hotel.

25 Q. Okay. So you flew in on the 19th, stayed

1 over. And then Mr. Butowsky picked you up on the
2 20th?

3 A. Yes.

4 Q. From the hotel?

5 A. Yes.

6 Q. To take you to his house.

7 A. Yes.

8 Q. Around 11 o'clock in the morning.

9 A. Yes.

10 Q. Okay. In advance of that meeting, had there
11 been conversations with respect to the purpose of the
12 meeting, the agenda for the meeting, the participants
13 in the meeting, or any other logistical --

14 A. No.

15 Q. -- issues?

16 A. No.

17 Q. Mr. Butowsky just told you that he wanted to
18 have a meeting in person?

19 A. Mm-hmm.

20 He did say he wanted to open up his Rolodex.

21 He said, I want to meet you in person, and
22 then I want to see this company, you know, turned to
23 a billion-dollar company.

24 Q. And by "this company," you meant Shadowbox?

25 A. Yes.

1 Q. Okay. Did Mr. Butowsky tell you, in advance
2 of the meeting, that there would be other
3 participants aside from Shadowbox members?

4 A. No.

5 Q. Okay. So you get to Mr. Butowsky's house at
6 around 11 o'clock in the morning of September 20th?

7 A. Yes.

8 Q. Okay. And then you walk me through what
9 happens from there.

10 A. We sit down in the living room. There are
11 other people there. Matt Couch is there. That's a
12 surprise to me.

13 We introduce each other. There's a woman,
14 who is Melia Zimmerman. There's a man named
15 Dave Stossel. Dave Stossel came there with
16 Joe Berkell [sic] -- B-e-r-k-e-l-l, I believe that's
17 the spelling. It might -- it could be B-i-r-k-e-l-l.

18 Joe Berkell [sic] is the husband of
19 Lara Logan, the 60 Minutes reporter.

20 And so here we are: Trevor, Manuel Chavez,
21 myself, Beth, Melia, Matt, a man named Josh who came
22 with Matt, Dave Stossel and Ed.

23 Danny (phonetic), who is Ed's wife, was, I
24 think, busy preparing some foods [sic], there, too.

25 So we all started to discuss things. And it

1 became bifurcated, where there were small discussions
2 here, small there.

3 But it was Ed who was holding court. And so
4 he would take a fork and go to a wine glass and says
5 okay, I have a speech.

6 And that's where he started to say, my life
7 has been turned upside down ever since I tried to
8 help a kid named Seth Rich. And he said, you know,
9 I've gone through horrible stuff, it's been horrible
10 for my family.

11 He played the victim card at that point.

12 And we had lunch. Joe Berkell was talking
13 about an application that can track who you associate
14 with on social media.

15 Dave Stossel was a veteran. And he was with
16 Bravo -- Bravo 13. He was a ranger.

17 And so, you know, I -- I've had an
18 association with -- with the Department of Defense,
19 you know, in an earlier incarnation. So we talked
20 about conflict. Seemed like a nice guy.

21 Ed then brought up -- I was at -- at one end
22 of the table. And Defango was there. I think Trevor
23 was two over.

24 And Ed brought up, here's what I want you
25 guys to do.

1 And he said, I want to outfit a van. I'll
2 pay for everything. I want it outfitted with a
3 StingRay. He said, I want you guys to have ability
4 to listen in on phone calls, to listen on
5 conversations, and to listen to whatever devices I
6 have to get into their emails.

7 And I stopped him cold, and I said, that's
8 wiretapping. It's federal. We don't break laws.

9 And Manny says, I break laws.

10 And Ed didn't like my answer and then
11 started talking to Manny. And he ignored me.

12 Manny said, yeah, we can do it. I can get
13 it to the point where -- where every keystroke, I'll
14 know what's going on with them.

15 And he says, I'm -- I'm down for a ride.
16 Let's go to Omaha.

17 So he's very, very specific in telling Ed he
18 can do it. He said he had the capabilities to do it.

19 This is a man who, until recently, was
20 denying that there was even a meeting.

21 Manuel Chavez livestreams everything. So he
22 was gung ho on it, hundred percent.

23 Q. Did Mr. Butowsky say why he wanted you to go
24 in a spy van to survey the -- to surveil the Rich
25 family?

1 A. He said, I'm going to get down to the bottom
2 of this. They're holding back on me.

3 Q. What did he think they were -- what did he
4 say he thought they were holding back?

5 A. That, only he can tell you. He never told
6 me other than, they're holding secrets from me.

7 And my -- I had -- I had two big problems
8 with it.

9 Number one, I'm a privacy freak, which --
10 which it seemed to me offensive.

11 But number two, it's beyond illegal. No one
12 had a private eye license; right? Which you can do a
13 certain amount of this stuff.

14 You can't -- you know, you can't eavesdrop
15 on phone calls. You can't, you know, listen in on
16 conversations at home. This is -- law enforcement
17 can if they suspect a crime; right? You -- you see
18 that.

19 But a private citizen doing this to another
20 private citizen is offensive as could be.

21 Q. How did that conversation end? In terms of
22 Mr. Butowsky was requesting that you would outfit a
23 spy van and surveil the Rich family, what was the
24 result of that conversation?

25 A. He ignores me mostly for the rest of the

1 day. And then, finally, he looks over at me, and he
2 says, you can't stomach -- stomach this, Dudley -- as
3 in Dudley Do-Right.

4 And he says, Manny and I will go handle it.

5 Q. Do you know whether this operation that
6 you're describing ended up taking place?

7 A. I have heard from Stuart Blaugrund.

8 (Reporter clarification.)

9 THE WITNESS: Blaugrund, B-l-a-u, as in the
10 German for blue, and then grund, g-r-u-n-d.

11 I heard from Stuart Blaugrund that
12 Matt Couch was in Omaha.

13 I didn't have any personal knowledge of
14 that, but he told me that.

15 I want to tell you another small thing that
16 happened in that room.

17 After Ed basically shooed me away,
18 Matt Couch looked over at Defango, and said, you are
19 really good. You just hacked my computer.

20 So right there, when they were standing next
21 to us --

22 Sorry. Got a piece of plastic.

23 Right when they were next to each other,
24 Matt declared to everybody, wow, Manny, you've got
25 chops. You just hacked my computer.

1 And Ed looked around and said, you're who I
2 want, and pointed a finger at Manny.

3 So Manny was doing it to show off to Ed to
4 show that he had the skill set.

5 Q. Is it your understanding that Mr. Chavez
6 had, in fact, hacked into Mr. Couch's computer at
7 that time?

8 A. I believe it.

9 Manuel Chavez has publicly stated that he's
10 hacked into my emails. And I believe he does have
11 those capabilities.

12 Q. During -- so -- I want to just take a step
13 back.

14 The -- when the meeting -- when the meeting
15 started, was everybody sitting around a room?
16 Sitting around a table? What was the -- the
17 configuration?

18 A. It was sitting around at a lunch table.

19 Q. Okay.

20 A. Where lunch was served maybe 20 minutes, 30
21 minutes in.

22 Q. Okay. And then Mr. Butowsky started the
23 meeting by giving a short speech about how --

24 A. Yes.

25 Q. -- he had been a victim?

1 A. How he had been a victim; how his life had
2 been torn asunder; how it's affected his family's
3 emotional state; how he's -- he -- he wakes up
4 crying; that all he wants to do is protect his wife
5 and kids from these constant attacks.

6 Oh. And that his son had bought guns to
7 protect the house.

8 Q. Did Mr. Butowsky explain why he felt like he
9 had come under attack?

10 A. He said it's an attack by the DNC. It's an
11 attack by Hillary. It's an attack by media matters,
12 David Brock.

13 And he said, they're out to silence all of
14 us.

15 Q. And what was the -- did he -- did
16 Mr. Butowsky say what the message was that he wanted
17 to get out, that was being silenced by the DNC and
18 others?

19 A. He didn't put it like that.

20 What he said is he's being persecuted
21 because he was the only honest guy to look into the
22 Seth Rich murder.

23 He said the fact that Doug Wigdor wants to
24 take down Fox News only adds to the fire. He said
25 there is a conspiracy to destroy him and destroy his

1 life and destroy his family.

2 Q. And that's -- did Mr. Butowsky say -- did
3 Mr. Butowsky say that what he was trying to
4 accomplish was --

5 Sorry. Strike that.

6 Did Mr. Butowsky say that one of his
7 objectives of convening the people at this meeting,
8 was to promote allegations that Seth Rich and
9 Aaron Rich had hacked the DNC emails and transmitted
10 them to WikiLeaks?

11 A. He did not state that that was his purpose,
12 to go public.

13 What he said was he was going to bring the
14 battle to the enemy. He said he had been hurt for
15 asking to find the truth. And he said no matter
16 what, he's going to get to the truth. And that's why
17 he was doing the planned surveillance operation with
18 Omaha and the Rich family.

19 Q. Did he say what he thought -- did he say
20 what the, quote-unquote, "truth" was, in his view?

21 A. He said, we already know they took 50 grand,
22 and they put a Dropbox with some of the material.

23 I can't recall beyond that.

24 Q. So Mr. Butowsky -- am I correct that -- am I
25 correct that your understanding is that Mr. Butowsky

1 convened to this meeting so that he could advance the
2 narrative that Seth Rich and Aaron Rich had been paid
3 \$50,000 to hack the DNC emails?

4 A. As part of the truth he wanted to put out,
5 as he put it.

6 Q. Okay. And how did he put it?

7 A. He talked about it. He said this is what
8 they did. And then he said, how do we get into their
9 bank accounts? How do we get into Aaron Rich's bank
10 accounts?

11 He said that. Absolutely.

12 Q. And did he provide any evidence,
13 whatsoever --

14 A. No.

15 Q. -- for the proposition --

16 A. No.

17 Q. -- that either Seth Rich or Aaron Rich had
18 any involvement in the DNC email hacking?

19 A. He provided no evidence.

20 Q. And so I'm going to ask you the question
21 again, and just to make sure there's a clear record.
22 So I'll -- I'll just ask you to wait till I've -- I
23 finish the question.

24 During this meeting, did Mr. Butowsky
25 provide any evidence, whatsoever, for the proposition

1 that either Seth Rich or Aaron Rich had any
2 involvement in hacking the DNC emails?

3 A. He provided no evidence.

4 Q. Did anybody, during the meeting, ask him
5 what his evidence was to support his allegation that
6 either Seth Rich or Aaron Rich were involved in
7 hacking the DNC emails?

8 A. Yes. I did.

9 Q. And what did you ask him?

10 A. I asked him, where is your evidence? How do
11 you know this?

12 His response was, I have a source and the
13 source is credible.

14 Q. Did anybody ask him who the source was?

15 A. I did.

16 And he said, someone connected to the
17 government.

18 My response was, as in IC?

19 (Reporter clarification.)

20 THE WITNESS: Intelligence community.
21 Clandestine services.

22 So, you know, I wanted to know if it was
23 FBI, CIA, whatnot, pick your alphabet.

24 And he said, that's not for discussion here
25 and now.

1 BY MR. RILEY:

2 Q. So did -- Mr. Butowsky was asking everybody
3 at this meeting to take it at face value that -- that
4 his allegations were credible against Seth Rich and
5 Aaron Rich.

6 A. Yes.

7 Q. Do you remember, did Mr. Butowsky say
8 anything at this meeting about a -- the Fox News
9 article by Melia Zimmerman having been retracted?

10 A. Yes. At that meeting.

11 Q. And what was said?

12 A. What was said was that they retracted it.
13 That it was Rupert Murdoch's sons who had a lot to do
14 with it; that she's been given a time-out; and that
15 she's not being given any new writing assignments,
16 because Fox News is now part of the coverup of the
17 Seth Rich murder and subsequent coverup.

18 He said that the D.C. police are complicit,
19 too; that the coroner is complicit.

20 And he said, I'm going to get down to the
21 bottom of it, no matter what. And then he said, we
22 gotta get the info from the Riches; they're holding
23 back.

24 And then he mentioned this guy Brad who we
25 had heard about before. I'm trying to think how.

1 And he said, he's media matters. You know,
2 he's with David Brock.

3 Brad Bauman.

4 (Reporter clarification.)

5 THE WITNESS: I believe B-a-u-m-a-n.

6 BY MR. RILEY:

7 Q. Did -- and did Melia Zimmerman say anything
8 during this meeting?

9 A. Melia did. We had a nice talk.

10 She seemed like a very nice person. She
11 said she's been given a time out at Fox, and she
12 can't do any stories. But she said that she's
13 getting paid during that period.

14 And she said that she's considering working
15 for One America News Network, and that she's
16 itching -- itching to go.

17 She communicated very well with Beth. They
18 became friends.

19 Mr. Riley, it's 1:10 right now.

20 MR. RILEY: Yep. We -- we can -- why don't
21 we take a break for 30 minutes to get lunch?

22 THE WITNESS: Yeah. Is there a place in the
23 building, too?

24 MR. RILEY: Yeah. We've -- why don't we go
25 off the record.

1 We'll take a 30-minute lunch break.

2 THE VIDEOGRAPHER: Okay. We're going off
3 the record at 1:11 p.m.

4 (Lunch recess.)

5 THE VIDEOGRAPHER: We are now back on the
6 record.

7 The time is 1:47.

8 BY MR. RILEY:

9 Q. Mr. Schoenberger, you understand that you're
10 still under oath?

11 A. Yes.

12 Q. And when we were off the record, we did not
13 discuss the -- we did not discuss your testimony;
14 correct?

15 A. Correct.

16 Q. Right.

17 Before we took a break, you were describing
18 a meeting that happened at Mr. Butowsky's house on
19 September 20th, 2017.

20 You remember that conversation?

21 A. Yes.

22 Q. Okay. During that conversation -- or during
23 that meeting, did Mr. Butowsky speak, at all, about
24 the connection, or any alleged connection between
25 Seth Rich -- between Seth Rich's murder and

1 accusations that President Trump's campaign had
2 conspired with the Russians to hack the DNC emails?

3 A. He said the Russian connection's fake. He
4 said, that's how they're trying to take down Trump
5 and delegitimize him as a president. "DNC dirty
6 tricks," is what he called it --

7 Q. Mm-hmm.

8 A. -- too.

9 Q. Did he say that one way to legitimize the
10 president, or support the president, would be to show
11 that Seth Rich and Aaron Rich had hacked the emails
12 and not the Russians?

13 A. No.

14 Q. How did the -- in what context did he talk
15 about the president and the president being
16 delegitimized?

17 A. He said, they're throwing the kitchen sink
18 at him. He said, the Russia thing is a fake.

19 And I said, okay, who?

20 And he said, the entire DNC, but also the
21 British.

22 I said, who?

23 And he said, MI6 and the whole machine.

24 And I said, well, they always interfere with
25 our politics. All the covert agencies do. That's

1 the way of the world.

2 And then he said, not Israel.

3 And I said okay. I thought it was a pretty
4 naive statement to make. Everybody spies on
5 everybody. It's the way it is.

6 Q. Was it your understanding that Mr. Butowsky
7 wanted to support -- was it your understanding that
8 Mr. Butowsky's efforts directed at the Rich family
9 were intended to support the president?

10 A. I didn't make that connection. He seemed
11 outside -- of any mention of Trump, he seemed furious
12 that information was being held back from him; that
13 he felt he had a right to.

14 Q. Did he say, at any point, specifically, what
15 information he believed that was being held back from
16 him?

17 A. No. That's the curious thing. When I asked
18 him, what do you think is being held back?

19 He looked at me. He said, whatever it is,
20 I'm gonna find out.

21 Q. Right.

22 And you talked about some conversations that
23 happened during the September 20th meeting involving
24 outfitting a -- a spy van.

25 A. Yes. He had stated that he wanted us to

1 drive to Omaha; to have a van that would have the
2 capability of eavesdropping. And our conversations,
3 no matter what room in the house it was, he wanted
4 the phones tapped, the computers tapped, the cell
5 phones tapped.

6 He said he wanted to be able to hear a pin
7 drop in the kitchen.

8 And I said to him, what if it's linoleum.

9 And he said, even that.

10 And I said, that's a big mistake. This is
11 breaking federal law, and we won't break laws with
12 Shadowbox.

13 Q. Did -- did he say what he was hoping or what
14 he wanted to obtain by spying on the Rich family in
15 that manner?

16 A. He said he was going to find out the truth.
17 And he said nothing's going to stop him. I remember
18 that statement.

19 Q. Did Mr. Butowsky -- Mr. Butowsky had taken
20 the position that he was just trying to help the Rich
21 family solve Seth Rich's murder previously; correct?

22 A. Yes.

23 Q. Did anybody raise with him a concern as to
24 why he was trying to spy on a family that he,
25 supposedly, was trying to help?

1 A. I did.

2 Q. And what did he --

3 A. I told him --

4 Q. What did he say?

5 A. He called me Dudley Do-Right. He -- he
6 brushed me aside for the rest of the meeting.

7 You know, he bonded with Manuel Chavez, too.
8 And so, you know, he --

9 He said, your hands are too clean for me.
10 That's what he said. And then he said, my buddy,
11 Matt here, has a CIA guy named Ty something.

12 And then he said, I'll work with Defango.
13 You know, he understands the job I want done.

14 Q. And then -- forgive me if I asked you this
15 previously.

16 But do you know, one way or the other,
17 whether a spying operation actually was conducted
18 against the Rich family in Omaha?

19 A. I did not know, at all, until
20 Stuart Blaugrund and I had a conversation, maybe a
21 month ago, where he stated that Matt Couch was down
22 there weeks later in Omaha.

23 I think he also wrote something in a text
24 message from me that I could try to find out.

25 Q. Mr. Blaugrund sent you a text message?

1 A. Yeah.

2 Q. And Mr. Blaugrund reported to you that
3 Mr. Couch had been in Omaha?

4 A. Yes.

5 Q. And when was Mr. Couch in Omaha?

6 A. I think a week or two after our meeting.

7 Q. Okay. During the meeting on September 20th,
8 you said Melia Zimmerman was also there?

9 A. Yes.

10 Q. Okay. And you talked earlier about how
11 Melia Zimmerman had reported that she had been placed
12 on paid leave, I believe, by Fox News?

13 A. Yes.

14 Q. Okay.

15 A. Exactly right.

16 Q. Are you looking for information on your
17 phone?

18 A. Yes. On Friday, May 3rd, he sent me three
19 Twitters. This is from Stuart Blaugrund.

20 And I think, if I click on one -- if you can
21 give me a second, bear with me, this is the evidence
22 that he showed me that showed that Matt was, indeed,
23 in Omaha.

24 Q. Okay. Okay. And I'll ask you to --
25 we'll -- we may ask you to produce documents through

1 a formal request at --

2 A. Sure.

3 Q. -- at some point.

4 For now, if you don't mind, you can just set
5 your phone aside.

6 A. Okay. Yeah. I've -- I've given you
7 90 percent of what I have, at least.

8 Q. Is -- aside from -- going back to Melia --
9 Melia Zimmerman for a moment.

10 What was her role at this meeting on
11 September 20th?

12 A. She described herself as a friend. She
13 also --

14 Q. A friend of Matt -- a friend of
15 Mr. Butowsky's?

16 A. Yeah, friend of Mr. Butowsky's.

17 And she didn't seem to have any active role.
18 She sounded like she had her wings clipped at work.

19 And I surmised that because Ed knew the CEO
20 of One America News Network, which was climbing up as
21 far as the conservative- -- you know,
22 conservatively-based news platform -- I assumed that
23 she was hoping that Ed would make the introductions,
24 and she could possibly get a job there.

25 Q. Was this -- the meeting on September 20th,

1 was it -- was it a structured conversation that was
2 run by Mr. Butowsky? Or was it, instead, in the
3 nature of basically a gathering with a bunch of kinda
4 separate conversations?

5 Can you explain that to me?

6 A. Quasi, both.

7 Q. Uh-huh.

8 A. At one point, Joe Berkell and Dave Stossel
9 produced diagrams to show how they could track
10 anybody and their relations to other people on
11 Twitter by taking advantage of their API, which is
12 a -- it's a technical term.

13 It -- Ed had them present, and then, once
14 again, held court. So it was -- it wasn't very well
15 organized because they were -- there was this many
16 giving speeches. And then, people went off into
17 their own conversations.

18 Q. So was it -- was it a series -- was it, at
19 least at first, intended to be a series of
20 conversations from various people who had been
21 convened at the meeting?

22 A. Yeah.

23 Q. And so Mr. Butowsky spoke at first. And
24 then presentations were given?

25 A. Then everybody was to introduce themselves

1 and say what they do.

2 Q. I see.

3 A. Yeah.

4 Q. And during the course of those
5 introductions, how did Melia Zimmerman introduce
6 herself and describe her role?

7 A. That she had been an investigative reporter.
8 And that she was happy to meet everybody.

9 She did not describe any sort of role,
10 whatsoever.

11 Q. Yeah.

12 And did Matt Couch introduce himself?

13 A. He did. He said he was a founder of America
14 First.

15 And he said, I'm an investigative reporter.
16 Right now, we're currently very involved with the
17 Seth Rich case. But I'm here to make America great
18 again.

19 Q. Mm-hmm.

20 A. That's what he said.

21 So he's very much like in that Trump model,
22 red hat, the whole nine yards.

23 Q. Mm-hmm.

24 And was -- you -- you said earlier that he
25 was accompanied by somebody named Josh at the

1 meeting?

2 A. Believe it was Josh.

3 Q. Was it -- do you remember if that was
4 Josh Flipppo?

5 A. I don't remember the last name.

6 Q. Was he a consultant --

7 Did -- did Josh introduce himself?

8 A. Josh did. And Josh was -- Josh was a
9 ranger, too. I think Dave Stossel and Josh were --
10 were both military. Both Army, in particular.

11 Q. Okay. During the course of the meeting on
12 September 20th, do you recall whether Mr. Butowsky
13 and Mr. Couch had any direct conversations?

14 A. They had a lot of them.

15 Q. And can you describe what they spoke about?

16 A. Okay. First off, you have Ed at the head of
17 the table. Matt would've been right next to this
18 young lady. And then Matt moved down next to him.

19 Manuel Chavez would've been the next one
20 over, sitting next to Matt Couch.

21 And that's why Matt Couch said, you hacked
22 my computer.

23 I think Melia would've been the next one
24 over, sitting right next to Ed. And then I guess I
25 was over here, across from Beth.

1 Q. Mm-hmm.

2 A. The conversations were we were -- we're --
3 we're going to get down to the bottom of this
4 Seth Rich thing. And my team -- he kept on saying,
5 my team's the best in the business.

6 Q. Matt Couch kept --

7 A. Matt.

8 Q. -- saying his team was the best in the
9 business?

10 A. Yeah.

11 Q. Did he say -- did he describe what that team
12 was? Or who was on it?

13 A. He mentioned this guy Ty, as well. He said
14 he had -- he said that he had former LEOs.

15 So "LEO" is an expression for law
16 enforcement.

17 My impression of Matt was that he -- that he
18 had no background in law enforcement investigation or
19 the military, and that he was surrounding himself
20 with people who had experience.

21 Q. And Matt Couch described himself as an
22 investigative reporter?

23 A. Yes.

24 Q. Did he explain to what extent he had any
25 actual investigative reporting experience?

1 A. He had none.

2 Q. Okay.

3 A. Yeah. He told me where he'd worked prior.
4 He -- he worked at Walmart. He was, you know, I
5 think, in fulfillment.

6 Q. Mm-hmm.

7 Did -- and did -- tell me more about the
8 conversations you heard between Mr. Butowsky and
9 Mr. Couch, to the extent there's more to ex- -- to
10 report.

11 A. There's not a whole bunch, other than him
12 trying to talk about how adept his services are.

13 He said something very strange to me.

14 He said, so how is Operation Spring Forward?

15 And I wondered how he knew that.

16 Operation Spring Forward was an operation I
17 was involved in in 2011. It was aborted because the
18 Taliban had drawn a bead on us.

19 It was going to be at Harrah, 50 miles from
20 the Iranian border. And (unintelligible). I speak
21 Farsi so --

22 (Reporter clarification.)

23 THE WITNESS: And I speak Farsi, and I
24 was -- I was chosen to be a part of it.

25 It's a -- it's a military humanitarian

1 thing. And somehow he knew about that, even though
2 it hasn't been debriefed.

3 Q. Mm-hmm.

4 A. So that was -- so he had some -- some people
5 with some -- some skills.

6 Q. I see.

7 A. Yeah.

8 Q. Did Matt Couch, at any point, talk about
9 Seth Rich or Aaron Rich?

10 A. He certainly talked about Seth Rich. I
11 don't remember any conversation about Aaron. But he
12 kept on saying, his name was Seth Rich. And he said,
13 we're farther along in our investigation than anybody
14 around.

15 And he was disdainful of other
16 investigators --

17 Q. Mm-hmm.

18 A. -- there.

19 But he spoke with respect with -- with Seth.
20 And he just said he was going to get to the bottom of
21 it and figure it all out.

22 Q. Uh-huh.

23 Did Matt Couch, at any point, ask
24 Mr. Butowsky any questions about Mr. Butowsky's basis
25 for alleging that Seth Rich and Aaron Rich were

1 involved in the DNC hack?

2 A. I heard nothing.

3 Q. Did anybody, during the course of the
4 meeting on September 20th, at any point, ask
5 Mr. Butowsky or Mr. Couch to discuss any of the
6 evidence contradicting their allegations that
7 Seth Rich and Aaron Rich were involved in the DNC
8 hack?

9 A. No.

10 Q. Was there -- aside from what you've
11 described in terms of the questions you asked, did
12 anybody, during the course of this meeting, express
13 any skepticism, whatsoever, with respect to
14 Mr. Butowsky's allegations that Seth Rich and
15 Aaron Rich were involved in the DNC hack?

16 A. Me.

17 Q. Other -- other than you, did anybody
18 express --

19 A. Nobody.

20 Q. Is it fair to say everybody just took it at
21 face value that the -- the narrative should be that
22 Seth Rich and Aaron Rich were involved in hacking the
23 DNC emails?

24 A. Mm-hmm. Yeah. I would say that I even
25 believed it at the time.

1 I don't now, but I did at that point.

2 And so did Beth, who has been a WikiLeaks
3 researcher for a number of years.

4 It was -- was the narrative that was being
5 put out there, and not just from Ed.

6 Q. Mm-hmm.

7 Was there any discussion, during the meeting
8 on September 20th, as to how people could monetize or
9 make money from the allegations against -- the
10 allegations against Seth Rich and Aaron Rich?

11 A. I didn't hear any. Matt was looking for
12 people to donate. That was his fixation, but it was
13 done in terms of a donation --

14 Oh.

15 Manuel Chavez, you know. Manuel Chavez
16 said -- said, this will be a good paying job, right,
17 Ed?

18 And Ed said yeah.

19 So Manuel was definitely looking to make
20 money.

21 Q. Was there a conversation at the meeting on
22 September 20th about Mr. Butowsky paying other
23 participants in the meeting to engage in a campaign
24 to push allegations against Seth Rich and Aaron Rich?

25 A. Only Manuel. I think he was the only one

1 that acknowledged, saying, you know, he'll be taken
2 care of. Which I took it to mean financially.

3 Q. And I'm -- I think you testified earlier
4 that Mr. Butowsky had paid for travel and lodging for
5 everybody to participate in this meeting?

6 A. Exactly right. He -- for whatever reason,
7 he did not -- I believe he did not pay for Beth's
8 room. And Beth had to pay for her own. That
9 could've been 'cause she's from Texas.

10 Q. But your understanding is that Mr. Butowsky
11 paid Matt Couch's freight to get to Texas?

12 A. I don't know about that. I only know what
13 happened with Shadowbox.

14 Q. During the meeting on September 20th, was
15 this a discussion about Rod Wheeler?

16 A. That's where he started to cut Rod down. He
17 said Rod had nothing going on in his life. He was a
18 loser. Kept on calling him a loser.

19 And he said that he came in and tried to
20 help him, and the guy turned on him.

21 And he said, you know, the guy's a complete
22 loser.

23 There's something else that I'm not
24 remembering. It's important. I just -- I can't
25 figure out what it is.

1 Q. There's something else that you're
2 remembering now from the meeting?

3 A. Yeah. Something about how...

4 Now I know what it was.

5 There were emails that were spoofed. And
6 that had to do with Rod Wheeler and had to do with
7 Melia. And so some were saying that -- that the
8 emails were faked. They were talking about the case
9 with Wheeler.

10 Q. And what case -- the -- was this a reference
11 to a lawsuit that Mr. Wheeler had filed against
12 Ms. Zimmerman and others?

13 A. I think he filed it against Ed and Melia;
14 right? So that started to come into the
15 conversation.

16 Q. And what emails were -- what was the
17 reference to emails being spoofed?

18 A. Think it was emails or texts.

19 And Ed said, I've got the real stuff here
20 and they tried to fake things.

21 Yeah, I think he made that allegation with
22 Sy Hersch, saying, these are not the real emails.
23 Look at what they did.

24 So he was trying to point out that Sy and
25 Rod had manipulated communications.

1 Q. So Mr. Butowsky was alleging that
2 Mr. Wheeler had doctored or faked or spoofed
3 communications between Mr. Wheeler and Mr. Butowsky?

4 A. Yes.

5 And I think between Melia Zimmerman and
6 Mr. Wheeler.

7 Q. Did he show you any emails?

8 A. He pointed at something. And I'm trying to
9 think where he did it. It could've been on his
10 computer.

11 I'm sorry, Mr. Riley. It's just -- it's
12 jumble. I have to think about it some more.

13 Q. Yeah. That -- that's fine. If it comes to
14 me, let me --

15 A. Yeah.

16 Q. -- let me know.

17 A. I want to answer honestly with everything
18 I'm remembering.

19 Q. Yeah. No, I appreciate that.

20 A. Sure.

21 Q. Was there any discussion during the
22 September 20th meeting...

23 Was the point made at the -- did
24 Mr. Butowsky make the point at the September 20th
25 meeting, that Rod Wheeler previously had been

1 Mr. Butowsky's mouthpiece for Mr. Butowsky's
2 allegations against Seth and Aaron Rich; and that now
3 that Mr. Wheeler had proved unable or unwilling to
4 continue serving in that role, that he was looking
5 for a new team to amplify and promote and to continue
6 the allegations that Mr. Butowsky was making against
7 Seth Rich and Aaron Rich?

8 A. He did not put it in those terms.

9 The way that he put it is, that Rod Wheeler
10 was an investigator who went rogue. So he didn't
11 talk about Rod Wheeler being a mouthpiece, at all.

12 Q. He -- he's -- he described Mr. Wheeler as an
13 investigator who went rogue?

14 A. An invest- -- a investigative -- well, a
15 homicide cop who went rogue. And that he had hired
16 him for his PI skills --

17 Q. Yeah.

18 A. -- and that the guy started out, he seemed
19 like a nice guy, but he's a loser.

20 Right? This is Ed talking. He's a
21 crackpot. No wonder he didn't last so long with
22 either D.C. or the Capitol police.

23 Q. And so Mr. Butowsky reported that he had
24 lost confidence in Mr. Wheeler, essentially?

25 A. Yes.

1 Q. And did Mr. Butowsky convey that because he
2 had lost confidence in Mr. Wheeler, he was now
3 looking for new partners to essentially fill the role
4 that Mr. Wheeler previously had held?

5 A. Not to fill the role.

6 He wanted us to be his militia. He kept on
7 saying that.

8 Q. Hmm.

9 A. And so we kept on saying, we're not your
10 militia.

11 And during that meeting, I said, what do you
12 want from us? You know, are you looking for equity
13 in the company?

14 He said, no, I don't want anything. Kept
15 saying, I don't want anything.

16 Q. Did you get -- did -- did you have the
17 understanding from this meeting, that Mr. Butowsky
18 was looking to -- he was looking to fill the void
19 that Mr. Wheeler left after Mr. Wheeler no longer had
20 Mr. Butowsky's confidence?

21 A. In an investigative sense, yes, to
22 investigate. And my hackles went up, as you know.

23 So I remember, I believe I told Beth, we
24 don't want anything to do with this. We can deal
25 with other clients. I don't want to touch this.

1 Q. Mm-hmm.

2 A. The reason being, is that I felt that
3 legally we could be liable because we had overheard
4 his conversation. If we get involved, they can go
5 back to that conversation and say, you were present
6 when a crime was -- was being discussed --

7 Q. Uh-huh.

8 A. -- was being plotted.

9 And so I wanted nothing to do with the Seth
10 Rich thing, no matter what he wanted to pay, from
11 that meeting forward --

12 Q. Mm-hmm.

13 A. -- and we kept to our -- to our bond.

14 Q. You said that he was looking for -- if I
15 understood your testimony correctly, you said that
16 Mr. Butowsky was looking for somebody to fill the
17 void that Mr. Wheeler left in an investigative
18 capacity.

19 Is that -- am I understanding your testimony
20 correctly? And if I am, is that the role that
21 Matt Couch was perceived to be playing?

22 A. Yes. Even wanted us to combine forces with
23 Matt.

24 Q. What do you mean by that?

25 A. That Shadowbox and Matt could merge.

1 Q. To basically replace Mr. Wheeler as the
2 investigator.

3 A. Yeah.

4 Q. You mentioned, earlier this morning, a
5 conversation that you had with Mr. Butowsky during
6 the September 20th meeting where Mr. Butowsky talked
7 about Admiral Lyons.

8 You remember that?

9 A. Yes.

10 Q. And -- and can you explain again, or -- or
11 just remind me, how that conversation arose with
12 Mr. Butowsky about Mr. -- Admiral Lyons.

13 A. He had some sort of folder in front of him,
14 and he pulled out a copy of this thing.

15 And he said, what do you think of this?

16 I read it, and I said, you know, powerful
17 writing.

18 And he said do you recognize the name?

19 And I didn't know who Admiral -- I still
20 don't, to this day.

21 Q. Mm-hmm.

22 A. And so he said, he's an icon. He's famous.
23 And he said, and that's what he wrote -- he said,
24 actually I wrote it, you know. That's where he -- he
25 admitted it.

1 And I didn't have much comment. Because
2 he's a new client. I'm trying to keep him from
3 rattling off too much. But half of the things that
4 he says would just be nonsense.

5 Q. Do you -- so -- so Mr. Butowsky showed you
6 an article that had "Admiral Lyons" in the byline --

7 A. Yes.

8 Q. -- but -- but Mr. Butowsky said that he had
9 actually written the article.

10 A. Exactly.

11 Q. And do you remember what the article was
12 about?

13 A. I remember it mentioned Israel.

14 Q. Mentioned Israel.

15 A. Yeah.

16 Q. Okay.

17 A. I don't remember the -- the -- the content.

18 Q. Yeah.

19 Do you -- do you remember -- do you remember
20 Mr. Butowsky talking about ghostwriting an article
21 for Admiral Lyons about Seth Rich and Aaron Rich?

22 A. Yes.

23 Q. And did that happen some months later?

24 A. I don't remember when. But I remember -- I
25 remember that.

1 And when he did, I said, oh, that's the guy
2 he put words in his hands, not his mouth. So --
3 I'm trying to think.

4 You guys are going to kill me, but I need
5 like another five-minute break.

6 Q. Yeah. If you need it, absolutely.

7 Yeah. Let's go off the record.

8 THE VIDEOGRAPHER: We are going off the
9 record at 2:18 p.m.

10 (Short recess.)

11 THE VIDEOGRAPHER: We are back on the record
12 at 2:30 p.m.

13 BY MR. RILEY:

14 Q. Mr. Schoenberger, you understand that you're
15 still under oath?

16 A. Yes.

17 Q. And during the break, we did not talk about
18 your testimony; correct?

19 A. Correct.

20 Q. Before we took a break, I was asking you
21 some questions about Mr. Butowsky's relationship with
22 Admiral Lyons. Remember that?

23 A. Yeah.

24 Q. And am I correct that Mr. Butowsky had an
25 arrangement with Admiral Lyons, whereby Mr. Butowsky

1 would write articles and put them under
2 Admiral Lyons' name?

3 A. Yes.

4 Q. And do you recall whether Mr. Butowsky wrote
5 an article --

6 Oh. I'm -- I'm going to ask you just to set
7 your phone aside while you're here.

8 Thanks.

9 Do -- do you recall whether -- do you -- do
10 you recall whether Mr. Butowsky, at any point, wrote
11 an article alleging that Seth Rich and Aaron Rich
12 were involved in hacking the DNC emails, and put that
13 article under Admiral Lyons' name?

14 A. I don't remember that.

15 Q. Okay.

16 A. I don't. I know that he explained the
17 relationship, and he said, I can write anything. And
18 Admiral Lyons loves me, and he'll put his name on it.

19 Q. Okay. Are you familiar with an article that
20 has Admiral Lyons in the byline that was published in
21 the WASHINGTON TIMES in the spring of 2018, that
22 alleged that Aaron Rich and Seth Rich were involved
23 in hacking the DNC emails?

24 A. I am aware. And the reason why I became
25 aware, is that that was made public. And the reason

1 why I'm aware of it is, the WASHINGTON TIMES
2 offered -- or made a retraction on their article.

3 I remember that was the one takeaway that I
4 got from it.

5 I didn't read too closely, but I remember
6 thinking, why would the WASHINGTON TIMES pull their
7 story.

8 Q. Do you have any reason to believe that
9 Mr. Butowsky was the actual author of the article
10 that was published in the WASHINGTON TIMES?

11 A. I think it's obvious. I think that
12 Admiral Lyons is a very old man and probably not even
13 followed the Seth Rich stories.

14 And I remember Googling Admiral Lyons and
15 seeing things that he had written about. And it
16 seemed like it was a -- you know, a singular event.
17 So clearly, to me, he was doing the -- he -- he was
18 playing front man, you know.

19 Ed was a ghostwriter for that.

20 Q. And -- and during the September 20th, 2017
21 meeting in Texas, Mr. Butowsky told you that he
22 ghostwrote articles for Admiral Lyons.

23 A. That's exactly what he said.

24 Q. And he showed you one example of an article
25 that he ghostwrote for Admiral Lyons.

1 A. Exactly.

2 Q. And he told you that Mr. Butowsky could
3 essentially write anything and Admiral Lyons would
4 put his name to it.

5 A. His name on it, yeah.

6 Q. I'm going to show you this document.
7 I can't remember what exhibit we're up to,
8 for exhibits.

9 THE REPORTER: G.

10 MR. RILEY: G? I'm going to mark that as
11 Exhibit G, as in "golf."

12 (Deposition Exhibit G was marked for
13 identification by the court reporter.)

14 BY MR. RILEY:

15 Q. Let me know once you've had a chance to look
16 at this document.

17 A. (Reviewing document.)

18 Okay.

19 Q. And the -- the -- the first page -- the
20 first page of this document appears to be an email of
21 March 3rd, 2018, at 9:40 a.m., from Th Stg.

22 Do you see that?

23 A. Mm-hmm.

24 Q. And Th Stg --

25 A. Is me.

1 Q. -- is you.

2 And did you, in fact, send this email?

3 A. Yes.

4 Q. Okay. And in the first email on March 3rd,
5 you send a link to an article, a zerohedge.com
6 article.

7 You see that?

8 A. Mm-hmm.

9 Q. And the article that you sent is provided in
10 the pages that follow; correct?

11 A. Yes.

12 Q. Okay. And the -- and in that article, in
13 the second line, reference is made to "a Friday op-ed
14 in the WASHINGTON TIMES," by retired U.S. Navy
15 Admiral James Lyons.

16 You see that?

17 A. Yes.

18 Q. Okay. And it says that the op-ed, "Asks a
19 simple, yet monumentally significant question: Why
20 haven't Congressional Investigators or Special
21 Counsel Robert Muller addressed the murder of DNC
22 staffer Seth Rich..."

23 You see that?

24 A. Yes.

25 Q. Do you see that that article is written

1 by -- it says Tyler Durden?

2 A. Which is a just nom de plume. Tyler Durden
3 is --

4 (Reporter clarification.)

5 THE WITNESS: A nom de plume, a French word.

6 It's a -- from what I understand, Tyler

7 Durden is -- was the character in the Fight Club.

8 And it could be five or six anonymous writers.

9 BY MR. RILEY:

10 Q. Do you know who actually wrote this article?

11 A. No.

12 Q. No, right.

13 Does this document refresh your recollection
14 as to whether you had conversations with Mr. Butowsky
15 about the publication of Admiral Lyons op-ed in the
16 WASHINGTON TIMES?

17 A. No. The reason why I sent it over, is it
18 had a mention of CrowdStrike.

19 Q. Mm-hmm.

20 A. And if you can see, Manuel Chavez is not
21 included. Manuel Chavez was rumored to be a part of
22 CrowdStrike.

23 So Ed was asking questions about Manuel,
24 saying, I want to make sure he's not an operative.

25 Q. Mm-hmm.

1 A. So it -- it mentions Seth Rich. And then,
2 it also at Kim Dotcom. And Kim Dotcom had been in
3 communication with Ed. So I -- I figured there was
4 enough there to send the article and see what
5 reaction he would do. And the reaction was, is Manny
6 up. Because he wanted to, you know, talk -- he
7 always wanted to talk to Manny. I was pretty
8 secondary.

9 Q. Mm-hmm.

10 You said Mr. Butowsky had been in contact
11 with Kim Dotcom?

12 A. Yes.

13 Q. What's your basis for that?

14 A. He told me.

15 Q. What did he tell you?

16 A. He said that he communicates with Kim Dotcom
17 a lot. Manuel Chavez says that he's communicated
18 with Kim Dotcom, as well.

19 Q. Didn't he tell you who Kim Dotcom is?

20 A. No. But I know that he's a German person
21 currently living in New Zealand. And that he had
22 started something called Megaupload.

23 And I think it got into trouble, legal
24 trouble, criminal trouble.

25 Q. Going back to the September 20th, 2017

1 meeting.

2 I think you testified that Mr. Butowsky
3 spoke, and then, there may have been a series of
4 introductions and some presentations, and then people
5 broke off into various conversations.

6 How did that con- -- how did that meeting
7 conclude?

8 A. I think we just broke up. And we had
9 planned to meet for dinner at, I think, Ed's club.
10 So I think it -- it probably concluded around 1:30 or
11 2:00.

12 Q. Okay. And it started at what time?

13 A. 11:00.

14 Q. So it was about a two to two-and-a-half-hour
15 meeting?

16 A. Yeah.

17 Q. Okay. Was there -- was there any
18 conversation about next steps for the group that was
19 there?

20 A. We were going to meet for dinner that
21 evening.

22 Q. Uh-huh.

23 A. So -- and I'm not exactly sure, just to be
24 honest, but I seem to recall we were either going to
25 meet for dinner, or we were going to fly back.

1 That's what I'm trying to figure out.

2 I -- I just remember that meeting bothered
3 me. Not only was it he's saying -- asking us to do
4 something highly illegal, but I also had, you know,
5 basically insurrection from someone that was
6 supposedly a -- you know, a principal in it.

7 And thirdly, I felt that -- you know, Ed had
8 basically said, I'm working closely with Manny.

9 And -- and frankly, I was really offended he
10 would ask us to -- to break the law.

11 I mean, he didn't even know us. Talk about
12 presumption.

13 Q. So how did the -- how did the meeting
14 actually end?

15 A. I think we all kind of said goodbye.

16 Q. Yeah.

17 A. Here is another thing that I do remember.

18 Beth and I, we were romantically linked. We
19 were having some sort of fight. I don't remember
20 what about. But it was tension between her and I.

21 Q. Mm-hmm.

22 A. Which happens a lot.

23 Q. So at the end, did -- did everybody say
24 goodbye to each other? Did Mr. Butowsky give any
25 sort of closing statement, or anything like that?

1 A. Thank you for all coming. And we have an
2 exciting future together.

3 That kind of thing.

4 Q. Did you have any conversations directly with
5 Matt Couch during the -- during that meeting on the
6 20th?

7 A. No.

8 Q. I want to go back to something we were
9 talking about earlier this morning, which was the
10 time period of August of 2017. So before --

11 A. Yeah.

12 Q. -- this meeting. And I think you said that
13 you had --

14 Well, let me just ask you this question:
15 When was the first time you spoke with Matt Couch?

16 A. Right around that time. I think right after
17 Trevor had sent his Twitter. I think it was his
18 Twitter to us, and I reached out to him saying I
19 want -- I'd like to talk to you.

20 And so that's when we started talking.

21 Q. Okay. And during those conversations, am I
22 correct that Matt Couch reported to you that
23 Mr. Butowsky had agreed to pay Mr. Couch?

24 A. Yes.

25 Q. And what did Mr. Couch say that that money

1 was for?

2 A. He didn't. I assumed it was to help Ed with
3 the Seth Rich thing. Because, you know, Matt was a
4 big Seth Rich writer. Matt and then a woman named
5 Cassandra Fairbanks. Those were the two preeminent
6 conservative voices researching Seth Rich.

7 Q. And Cassandra Fairbanks was not at the
8 meeting on September 20th? Or she was?

9 A. No, she wasn't.

10 Q. Okay.

11 A. But she knows that they're quite close.

12 Q. Yeah. Have you had conversations with
13 Cassandra Fairbanks?

14 A. On Twitter, a couple interactions, but
15 nothing regarding Seth Rich.

16 Q. Mm-hmm.

17 A. Once when she was being attacked, there was
18 someone being very sexist and very crude with her.

19 Q. Mm-hmm.

20 A. So I said, is this guy bothering you?

21 And she said yes, and so I blasted him and
22 he went away.

23 Q. What's your understanding of Cassandra
24 Fairbanks' relationship with Ed Butowsky?

25 A. Very close. He said, she's my number one

1 girl after Melia. So that's what he said.

2 He said she's great.

3 I had a sense that he had paid her.

4 Q. And what was your sense based on?

5 A. Just a feeling.

6 Q. Mm-hmm.

7 A. It's speculative [sic], but I got a sense
8 that she was in his pocket. So...

9 Q. Did Mr. Butowsky report to you that he had
10 been -- that he was paying Matt Couch?

11 A. No. He didn't say anything.

12 Q. Uh-huh.

13 But -- but Matt Couch did report to you that
14 Mr. Butowsky owed him money?

15 A. Yes.

16 Q. Okay. And can you tell me about those
17 convers- -- the initial conversations you had with
18 Matt Couch in August of 2017 about his relationship
19 with Mr. Butowsky?

20 A. Yeah. He was going back and forth, saying,
21 I don't know if this guy's for real. He says things
22 that don't seem genuine. He's promising money. He
23 hasn't given me anything.

24 I said, we got paid, the first thing was to
25 say, we've gotten paid.

1 And he said, well, you're getting paid. I'm
2 not.

3 And then, Ed had made some kind of comment
4 saying, you should join forces with Matt.

5 And, you know, you have to understand, I'm
6 apolitical.

7 Beth is a burner.

8 Manuel loves Hillary; and Trevor, who knows.

9 So -- and then here we are with someone who
10 is, obviously, a Trumpster.

11 So it was s really interesting thing.

12 I was probably the most conservative member
13 of Shadowbox. But, you know, you wouldn't rank me as
14 a conservative. I'm libertarian. It's different.

15 Q. Yeah.

16 (Reporter clarification.)

17 THE WITNESS: You wouldn't consider me a
18 normal conservative. I'm a libertarian.

19 So I can have -- can actually be liberal
20 about a number of things and conservative about
21 others.

22 Definitely a fiscal conservative.

23 BY MR. RILEY:

24 Q. And I think you said earlier, Mr. Butowsky
25 was known to be a supporter of President Trump.

1 A. Yeah.

2 Q. So am I correct, then, that in -- as of
3 August of 2017, Mr. Couch and Mr. Butowsky had
4 entered into a financial arrangement with each other?

5 A. Yes.

6 Q. And the purpose of that financial
7 arrangement was for Mr. Couch to pursue allegations
8 that Seth Rich and Aaron Rich were involved in
9 hacking the DNC emails.

10 A. Yes.

11 Q. And the reason Mr. Butowsky was paying
12 Matt Couch to pursue allegations that Aaron Rich and
13 Seth Rich were involved in hacking the DNC emails,
14 was because Rod Wheeler had proven unreliable to
15 Mr. Butowsky.

16 A. I think it was even more than that. I think
17 that Ed liked the idea that Matt had a team. So I
18 guess Matt was going to be his militia.

19 Q. So -- so Ed Butow- -- and -- and -- as of,
20 at least, August 2017, and perhaps earlier, but no
21 later than August of 2017, Mr. Butowsky paid
22 Matt Couch to serve as Mr. Butowsky's militia with
23 respect to Mr. Butowsky's allegations that Aaron Rich
24 and Seth Rich had hacked the DNC emails.

25 A. I think that Matt Couch was complaining in

1 August of 2017. But I think, obviously, he was at
2 that meeting for September 20th --

3 Q. Mm-hmm.

4 A. -- so he got paid.

5 Q. Yeah. But -- so that -- just so the --
6 there was an arrangement as of at least September --
7 as -- sorry.

8 As of at least Octo- -- sorry.

9 As of at least August of 2017, there was an
10 arrange- -- a financial arrangement between Ed
11 Couch -- between Ed Butowsky and Matt Couch --

12 A. Yeah.

13 Q. -- whereby Ed Butowsky --

14 A. Put --

15 Q. -- paid Matt Couch to be Ed Butowsky's,
16 quote-unquote, "militia," with respect to
17 Mr. Butowsky's allegations against Aaron Rich and
18 Seth Rich.

19 A. Yes.

20 Q. Okay. And did Matt Couch have conversations
21 with you about whether there was any actual evidence
22 supporting Mr. Butowsky's allegations that Aaron Rich
23 or Seth Rich were involved in hacking the DNC emails?

24 A. He never did.

25 You know, part of my conversation with him

1 was, I told him, if I hear the name "Seth Rich" one
2 more time, I'm going to blow up.

3 So we talked about other things.

4 Q. Did Matt Couch ever tell you whether he
5 actually believed that Aaron Rich or Seth Rich had
6 anything to do with hacking the DNC emails?

7 A. He didn't. It was -- forgot about this. He
8 was enamored of who I was as a -- as a person. So it
9 was more, you know, always complimenting me, you
10 know, always asking, you know, you've done things all
11 over the world, that kind of thing. So...

12 It was more that he was asking me, you know,
13 where did you learn all these languages? Where did
14 you do this? How do you -- how did you know Bruce
15 Cooper Clarke, the --

16 Bruce Cooper Clarke who was a former deputy
17 director of the CIA. He's a close friend. He's the
18 one who cleaned up the CIA. It dirty again, by the
19 way.

20 (Reporter clarification.)

21 THE WITNESS: It's -- he's -- he's the one
22 under Admiral Turner, that cleaned up the CIA and
23 booted over 800 agents because they were corrupt.
24 So...

25 Bruce was a great guy.

1 Q. Sorry. I want to go -- there's one question
2 I actually had about the September 20th meeting that
3 I failed to ask you.

4 During that meeting, Mr. Butowsky -- you've
5 testified that Mr. Butowsky inquired as to the
6 feasibility of a surveillance operation against the
7 Rich family in Nebraska.

8 Right?

9 A. Yes.

10 Q. Was there any discussion about having a
11 surveillance operation targeted at Aaron Rich?

12 A. Yes. That's -- Ed asked Defango that. And
13 I kept quiet.

14 And Defango started to say, well, we
15 could --

16 And then Ed shut him up because he looked
17 over at me; he said, we'll talk later.

18 So he had -- actually, it came out of his
19 mouth -- out of his mouth.

20 And Defango says, oh, sure. We can do this
21 and this.

22 And then Ed caught himself and noticed that
23 I was watching every move, and he said, okay, let's
24 talk about this later.

25 Q. What exactly did Mr. Butowsky or Mr. Chavez

1 say about potentially surveying -- surveilling
2 Aaron Rich?

3 A. Ed had only asked -- he said, could you do
4 the same with Aaron Rich?

5 And then he said, absolutely, 100 percent.

6 And then after the meeting, I talked to
7 Defango.

8 Defango said, I got this handled. I'm Ed's
9 point man. I can handle both of these jobs in my
10 sleep.

11 And I told him, this is not going to be on
12 Shadowbox. I want nothing to do with this.

13 And he said, don't you worry.

14 Q. Do you know whether a surveillance operation
15 was, in fact, conducted against Aaron Rich?

16 A. That's what Manuel Chavez told me later. He
17 said -- yeah.

18 He said, I -- I'm on it, and the wheels are
19 in motion.

20 Q. Mm-hmm.

21 A. So then, when I was -- February 3rd, I moved
22 in, in Dallas.

23 Defango -- Manuel Chavez, he goes by the
24 name "Defango" -- was there a couple days before. So
25 perhaps, five or six days in, we were having lunch at

1 a Mediterranean place around the corner.

2 And I said, so, you know, did you do all
3 that dirty work for Ed?

4 And he said, yep, and I've got more coming.

5 So I --

6 You know, I -- I said really? You think
7 this is the right thing to do?

8 And he says, leave no fingerprints.

9 And he just looked at me. I just thought
10 really.

11 And so I said, the brother, too?

12 He said, all of it. I told you I'd handle
13 it.

14 Q. Did he say anything further about what
15 exactly he had done?

16 A. I asked him.

17 I -- I said, you know, what have you done?

18 He said, I got my peeps -- you know, as in
19 people.

20 Q. Mm-hmm.

21 A. And -- and he said, all I have to do is make
22 one phone call and magic happens.

23 Q. Mm-hmm.

24 A. Remember that, that statement.

25 So and then, I asked him again. I said, so

1 what exactly did -- did -- did you do?

2 And he said, you don't want to know.

3 Q. Mm-hmm.

4 A. And we left it at that.

5 Q. Did you consider, at that point or after the
6 September 20th meeting, reporting any of this to the
7 police or law enforcement?

8 A. Here's the thing. A day or two later, I
9 went back to him.

10 I said, if you actually did something, you
11 can be in deep trouble. I should just report this to
12 the police. We're having a fight.

13 He -- he said, go ahead, they can never
14 connect it to me.

15 Q. Mm-hmm.

16 A. Cops are dumb. He said, most of them have a
17 high school education and an IQ of 105. He said,
18 I've got a 137 IQ.

19 I remember that number, 137.

20 Q. Mm-hmm.

21 So you did -- you ultimately did not report
22 it to law enforcement?

23 A. No. When I made that threat, and he said,
24 no fingerprints, I said, why don't I go report it?

25 And he's, aha, psych.

1 Q. Mm-hmm.

2 A. And that's a way of saying, I'm kidding.

3 So --

4 Q. Yeah.

5 A. -- his -- he saw I was pretty serious.

6 Q. Okay. Around the time -- I -- I'm going
7 back now to the period of August 2017, when you were
8 having initial conversations with Matt Couch.

9 A. Yep.

10 Q. Do you have a recollection as to an event in
11 mid-August of 2017, where Mr. Butowsky appeared on a
12 Periscope that Mr. Couch was broadcasting, about
13 Seth Rich?

14 A. No.

15 Q. You have no recollection of that?

16 A. None. I'm sure it happened.

17 Q. Do you have an understanding as to how often
18 Mr. Couch and Mr. Butowsky communicated with each
19 other?

20 A. Yeah. He -- Matt Couch told me, daily. And
21 then when he couldn't reach Ed for four days, he
22 called me. And I left a message for Ed.

23 Q. Mm-hmm.

24 A. Manuel Chavez also said that he was going to
25 do YouTubes on Ed -- which he ended up doing.

1 So I think between Cassandra, Matt and
2 Defango, they were operating as kind of a publicity
3 wing.

4 Q. Uh-huh.

5 When did Matt Couch tell you that he was
6 having daily communications with Mr. Butowsky?

7 A. That would've been mid-August.

8 Q. Uh-huh.

9 And did he -- did Mr. Couch say how those
10 communications were being conducted? Via email,
11 telephone, for example?

12 A. I think Signal.

13 Q. Uh-huh.

14 A. Yeah.

15 Ed was not much of an email guy.

16 Q. Did Mr. Couch tell you what he -- he and
17 Mr. Butowsky were talking about?

18 A. Seth Rich.

19 Q. Can you elaborate on that?

20 A. Mr. Riley, I was not interested in the Seth
21 Rich thing. I had seen Kim Dotcom and others talk
22 about it ad nauseam. And I was trying to start a
23 business.

24 So when Matt would say "Matt Couch," I'd
25 say, next -- or -- or "Seth Rich," I would say, next

1 subject.

2 Q. You referred to Matt Couch and Cassandra
3 Fairbanks and --

4 A. Defango.

5 Q. -- Defango as --

6 A. As publicity wing.

7 Q. Yeah. And how -- what do you -- what do you
8 mean by that?

9 A. Well, he stated he was very, very close to
10 Cassandra. He was able to get her to do something
11 with big league politics.

12 He had a friendship with Gateway Pundit. He
13 seemed to know the media types.

14 He loved what was going on with Trevor,
15 'cause Trevor had all these ties, until Trevor hit
16 him up for money; and had his computer open, and
17 said, look I have a negative balance.

18 And that turned Ed off. He actually got
19 really cold to Trevor.

20 Q. When was that?

21 A. Morning of the 21st of -- of September,
22 2017.

23 Q. The day after the meeting?

24 A. Yeah.

25 Q. Okay. Do you know whether Mr. Butowsky was

1 paying Cassandra Fairbanks?

2 A. I don't.

3 Q. All right. So after the meeting on the
4 20th, it sounded like you guys stayed over, the next
5 day?

6 A. Yeah.

7 Q. Okay. And was there follow-up meetings?

8 A. I seem to recall that we were going to fly
9 out that night. And we had lunch with Joe Berkell,
10 Beth, myself, Manuel Chavez, Ed -- and maybe one
11 other person.

12 Q. Lunch on the 21st?

13 A. Yeah.

14 Q. Do you remember where that was?

15 A. No.

16 Q. Do you know what kind of restaurant it was?

17 A. I don't.

18 Q. Was it --

19 A. I remember where I was sitting.

20 Q. Yeah. You do remember where you were
21 sitting?

22 A. I was sitting right next to Joe, and Beth
23 was next to me.

24 Q. Uh-huh.

25 And what was the conversation during that

1 lunch?

2 A. That Joe had been talking about a certain
3 application him and Dave had been doing for a while.
4 So he started to rattle on about that. It was pretty
5 boring.

6 Q. Mm-hmm.

7 Was there a conversation about Seth or
8 Aaron Rich --

9 A. No.

10 Q. -- during that lunch?

11 A. No.

12 Q. There wasn't.

13 Was there any conversation during that lunch
14 about the spy van?

15 A. No.

16 Q. No?

17 Was Matt Couch at that lunch?

18 A. I don't think so, no.

19 Q. Okay. After the -- after the meeting in
20 August -- at some -- am I correct that at some point
21 after the meeting in August of 2017 --

22 Well, sorry. Strike that.

23 After the meeting in August of 2017,
24 Shadowbox continued to do work for Mr. Butowsky; is
25 that right?

1 A. Yeah. We did some work.

2 Q. And what was the nature of the work that
3 Shadowbox was doing?

4 A. Scraping the Internet, seeing what negative
5 things were being said.

6 Q. Uh-huh.

7 And was Mr. Butowsky still paying Shadowbox
8 at that point?

9 A. No. He made a one-time pay- -- payment of
10 20 grand.

11 Q. Okay. And was -- for the period after the
12 August -- or sorry -- the September of 2017 meeting,
13 was there continued coordination between Matt Couch
14 and Ed Butowsky, that you observed?

15 A. Yes. I believe so.

16 Q. And can you tell me a little bit about that?

17 A. I'm trying to remember.

18 Ed had turned us on to some sort of client.
19 It was giving trophy coins. It was tied in with the
20 vets.

21 (Reporter clarification.)

22 THE WITNESS: Or trying to -- yeah.

23 Challenge coins, I think they're called. And he
24 wanted -- Ed wanted Matt and I to try to secure this
25 client and do that.

1 So understand that at that point, Ed knew
2 that I would not be involved in any of these dark,
3 illegal situations.

4 MR. RILEY: Mm-hmm.

5 THE WITNESS: So I was happy doing dark ops,
6 which is observing.

7 MR. RILEY: Mm-hmm.

8 THE WITNESS: I was not happy with any
9 hacking, any -- anything that's -- that's illegal or
10 anything that you need a PR -- a PI license.

11 MR. RILEY: Mm-hmm.

12 Q. Did you have conversation -- conversations
13 directly with Matt Couch after the September 2017
14 meeting?

15 A. Very little.

16 Q. Uh-huh?

17 A. Very little. I think he had blocked Beth,
18 and so I pulled back from -- from him.

19 Q. Mm-hmm.

20 Do you need a break for a couple of minutes?

21 A. Is that okay?

22 Q. Yeah, of course it is. Yeah.

23 THE VIDEOGRAPHER: Okay. We are going off
24 the record at 3:03 p.m.

25 (Short recess.)

1 MR. RILEY: Are we ready?

2 THE VIDEOGRAPHER: We are back on the record
3 at 3:17 p.m.

4 BY MR. RILEY:

5 Q. Mr. Schoenberger, you understand that you're
6 still under oath?

7 A. Yes.

8 Q. Okay. And we did not discuss your testimony
9 while we were off the record; is that right?

10 A. That's correct.

11 MR. RILEY: I'm going to mark this as the
12 next exhibit.

13 Are we on -- what number are we on? Or
14 letter are we on?

15 THE VIDEOGRAPHER: G, I believe.

16 MR. RILEY: I think it's H.

17 THE VIDEOGRAPHER: Oh, no. H.

18 (Deposition Exhibit H was marked for
19 identification by the court reporter.)

20 BY MR. RILEY:

21 Q. And let me know once you've had a minute to
22 read that document.

23 A. (Reviewing document.)

24 Q. Have you had a chance to review that
25 document?

1 A. Yes.

2 Q. And the first -- the first email in this
3 chain appears to be a December 23rd, 2017 email at
4 1:05 p.m., from WellTraveledFox.

5 Do you see that?

6 A. Yes.

7 Q. Do you know whose email that is,
8 WellTraveledFox?

9 A. Beth Blackburn Bogaerts.

10 Q. Right.

11 And in her email, she says:

12 "Hi, Ed, I hope all is well." It says:
13 "Matt has been in touch with us as per your
14 suggestion."

15 Do you see that?

16 A. Yes.

17 Q. Is -- is "Matt" in that sentence Matt Couch?

18 A. Absolutely.

19 Q. And do you have an understanding of what
20 she's referencing there when she says, "Matt's been
21 in touch with us, as per your suggestion"?

22 A. Yes. Ed had told Beth that he wanted us to
23 be close with Matt and work with Matt.

24 Q. Work with Matt doing what?

25 A. I -- we couldn't figure it out.

1 Q. Uh-huh.

2 A. At least, I couldn't.

3 Q. Uh-huh.

4 Do you know -- do you have an understanding
5 of the type of work Matt was -- Matt Couch was doing
6 for Ed Butowsky at around this time?

7 A. No. I assume that he was his personal
8 investigator.

9 Q. Uh-huh.

10 Matt Couch was -- this -- this e-mail's in
11 December of 2017.

12 A. Yeah.

13 Q. At that point, Matt Couch was filling the
14 role Fred Butowsky -- that Rod Wheeler previously had
15 served; is that right?

16 A. Yes.

17 Q. And what's the basis for your understanding
18 that that was the case?

19 A. That Matt had basically told me he was Ed's
20 personal investigative team.

21 Q. Yeah.

22 So is it fair to say, then, that Matt Couch
23 and Ed Butowsky had entered into an arrangement with
24 each other?

25 A. Yes, by that time.

1 I want to also point out where it says the
2 company's reorganizing, this was after Beth
3 discovered that Trevor and Manuel Chavez had secretly
4 formed a company called Silent Partner IO.

5 Q. Right.

6 A. And they were attempting to gut us or go
7 behind our back.

8 Q. I see. I'll get to that in just a second.
9 I wanted -- on this -- the prior sentence, "Matt's
10 been in touch with us as per your suggestion."

11 So your understanding was that Matt Couch
12 and Ed Butowsky had entered into an arrangement with
13 each other, whereby Matt Couch would amplify
14 Mr. Butowsky's allegations against Seth Rich and
15 Aaron Rich with respect to the DNC emails.

16 A. Yes.

17 Q. Okay. And then, you just talked about this
18 a little bit, the reorganizing -- the reference to
19 reorganization of the company. That's reference to a
20 reorganization of Shadowbox; yes?

21 A. Not in a typical sense.

22 Q. Uh-huh.

23 A. Beth is not a businessperson. So it wasn't
24 a Chapter 12 or 13 --

25 Q. Mm-hmm.

1 A. -- or 11 or 13.

2 This was after she had caught Trevor
3 red-handed with Manuel. And I wanted to get rid of
4 both of them.

5 She said, well, hang onto Manuel because
6 he's so close to Ed.

7 Q. Mm-hmm.

8 A. And with Trevor, he was cut loose.

9 Q. And what was your understanding why --

10 And "Manuel" is a reference to
11 Manuel Chavez?

12 A. Yes.

13 Q. Who also goes by "Defango"?

14 A. Yes.

15 Q. And what was your understanding as to why
16 Manuel Chavez and Mr. Butowsky were so close?

17 A. They clicked. Ed took to him. Ed just
18 loved him.

19 Q. And is that because Mr. Chavez had expressed
20 a willingness to engage in nefarious activities on
21 Mr. Butowsky's behalf?

22 A. Exactly.

23 Q. And -- and so Mr. Chavez and Mr. Fitzgibbons
24 formed a new company?

25 A. Yes.

1 Q. And what was that company called again?

2 A. Silent Partner I don't.

3 Q. And did you have an understanding as to the
4 work that Silent Partner I don't was doing? And in
5 particular, whether they were doing work for
6 Mr. Butowsky?

7 A. I'm unaware of whether they were doing work
8 for Ed Butowsky, but I suspected so.

9 The work would be rather like Shadowbox, but
10 willing to go the extra mile. So from --

11 When I confronted Trevor Fitzgibbon, he got
12 very angry at me, and I fired him.

13 Q. And you confronted him -- you -- you
14 confronted Mr. Fitz- -- Fitzgibbon about -- about
15 what exactly?

16 A. About going behind our backs to form a
17 company that would cannibalize Shadowbox. And I
18 asked him why.

19 And he said something about Beth. He had
20 liked Beth, Beth liked me.

21 I told him, this is insubordination. And I
22 said, you're fired, and I'm firing Manny next.

23 And that's where I was ready to fire Manny.

24 And Beth told me, you don't want to do this.
25 We have an ongoing client. Sometimes there's a

1 necessary evil, or something along those lines.

2 So I bit my tongue.

3 Q. So Shadowbox maintained its relationship
4 with Manuel Chavez at that point, because
5 Manuel Chavez was close with Mr. Butowsky, who was a
6 very important client for Shadowbox?

7 A. Yeah.

8 Q. Uh-huh.

9 In the next sentence in this email, it says:

10 "Matt tells us you have had some good chats
11 with him."

12 You see that?

13 A. Yes.

14 Q. And do you have an understanding as to what
15 that's a reference to?

16 A. That would've been Matt informing or
17 reporting to us that he's had great chats with Ed,
18 and that he's getting closer and closer to Ed.

19 Q. And do you remember those conversations with
20 Mr. Couch where he reported the good chats that he'd
21 had with Mr. Butowsky?

22 A. Yes.

23 Q. And what did Mr. Couch tell you?

24 A. He said that he was working closely with Ed,
25 and that they now understand each other, and that

1 he's not going to let Ed hoodwink him.

2 Q. What did he -- what did -- what did you
3 understand him to mean by that, getting hoodwinked?

4 A. That Ed would pull a fast one on anybody, if
5 he could. So Matt was expressing that he might be a
6 country boy, but, you know, he's not a dumb country
7 boy.

8 Q. Did Mr. Couch, around this time, tell you
9 anything about how his, quote-unquote,
10 "investigation" into the Seth Rich murder was going?

11 A. No. He knew better than to talk to me about
12 it.

13 Q. Yeah.

14 Did Mr. Couch tell you anything about
15 whether Mr. Butowsky was Mr. Couch's source for
16 Mr. Couch's allegations about Seth Rich and
17 Aaron Rich?

18 A. No, he didn't.

19 Mr. Riley, we had gotten to the point where
20 he knew better than to even mention the Rich family
21 to me.

22 Q. And remind me why that was that he -- that
23 you and he -- that you and Mr. Couch stopped talking
24 about the Rich situation?

25 A. Because I told him I have no interest in the

1 case. I felt that there was no value for our
2 company. He -- even though Mr. Butowsky was obsessed
3 with it, he was running to Cassandra, Kim Dotcom,
4 Matt Couch, Defango.

5 And I felt that our best bet as could be,
6 would be to concentrate on other clients, which you
7 see one now, Atlas Media. That had to do with a
8 movie that had come out, and they wanted to gray-mark
9 it.

10 So I had gotten Matt in touch with Atlas
11 Media. And he said he could create distribution
12 channels. But it never got off the ground.

13 Q. Who said that they could create
14 distribution --

15 A. Matt Couch, because he had worked with
16 Walmart which, you know, has a thousand boxes; right?

17 Q. What was Atlas -- Atlas Media was a movie?

18 A. Atlas Media was a company that was tasked
19 with finding distribution channels for a movie that
20 had -- a military movie.

21 Q. Had there ever been conversations involving
22 either Mr. Couch or Mr. Butowsky with respect to
23 potential book or movie deals relating to the murder
24 of Seth Rich?

25 A. Ed had mentioned something to me where he

1 said, when my story comes out, it'll be an American
2 classic, and it'll be required reading in schools.

3 Q. Mm-hmm.

4 A. So he had thought in the future and thought
5 he -- he -- he wanted a book.

6 Manuel Chavez had approached me, and he
7 said, I'm going to have Ed underwrite a crypto
8 currency, a Seth Rich crypto currency.

9 And then he had bragged to me. He said, Ed
10 thinks you're too straight. That's what he told me.
11 He said, you're too square.

12 And then maybe a week and a half to two
13 weeks into our -- this would've been February 20th or
14 so -- Ed started going over -- or Defango started
15 going over to Ed's house to, you know, work on his
16 computers. He had done that once before when we
17 first met.

18 So he -- when I asked him, what are you
19 doing? He said, outfitting things for surveillance
20 campaigns.

21 Q. Mr. Chavez said that he was going to
22 Mr. Butowsky's house to out- -- to -- to build
23 surveillance campaigns?

24 A. To build surveillance campaigns and also to
25 order the right equipment to surveil people,

1 including -- he mentioned some very expensive \$5,000
2 piece of equipment, too, which he said Ed was going
3 to get for him.

4 Q. And what kind of equipment was this?

5 A. This was a device that would allow someone
6 to figure out all the connections you have on social
7 media platforms. It was very much what -- what
8 Dave Stossel was talking about.

9 Q. Going back to this email, there's the next
10 sentence. And again, this is two days before
11 Christmas in 2017.

12 The next sentence says:

13 "Thomas is preparing to move to Dallas
14 around the 1st, and we believe that since Matt is
15 only five hours away, he should be there two days a
16 week to help codevelop strategies."

17 You see that?

18 A. Yes.

19 Q. And am I correct that you did, in fact, move
20 to Texas shortly after this?

21 A. February 3rd.

22 Q. And did Mr. Couch, in fact, come to Texas --

23 A. No.

24 Q. -- at the --

25 Do you know why not?

1 A. I have no idea.

2 Q. Do you have an understanding of what the
3 reference to codeveloping strategies is here?

4 A. I had put my foot down after what happened
5 in September and then finding Trevor Fitzgibbon and
6 Defango in cahoots.

7 And so I basically said, we're not going to
8 go ahead and be a company that gets into this stuff.
9 I want to build things. I want to create things.

10 So that's why with this movie thing, it was
11 attracted to me. It's why we took on the rabbi to
12 expand his footprint. It's why with this Marty
13 person, you know, he -- he wanted -- he was a
14 philosopher on top of being an insurance guy -- he
15 wanted to make a bunch of videos.

16 Q. Mm-hmm.

17 In the next sentence in this email, in
18 Exhibit H, as in "hotel," it says:

19 "Meanwhile Twitter has begun purging
20 (started December 18th) so the models we are
21 developing will have to include the code word idea
22 you came up with."

23 Do -- do you understand what this is a
24 reference to --

25 A. No.

1 Q. -- the code word idea?

2 A. She must -- he must have told her that
3 directly.

4 Q. And or -- do you know what -- what were the
5 models you were developing?

6 A. We were developing models where --
7 linguistic algorithms, which means that if Ed was
8 being mentioned anywhere, we could find it.

9 Q. I see.

10 A. And Ed had repeatedly told us that he wanted
11 these big, huge influencers; that he wanted people
12 with 100,000, 200,000 followers.

13 So that's why he liked Matt, and that's why
14 he was pushing Defango to get bigger and bigger and
15 bigger.

16 He admitted at that time that he had paid
17 for his followers, on Twitter.

18 Q. So Mr. Butowsky was interested in procuring
19 the support of social media influencers.

20 A. Yes.

21 Q. And social media influencers are people who
22 have large followings on social media.

23 A. And engagement, yes.

24 Q. And Matt Couch was considered by
25 Mr. Butowsky to be a social media influencer?

1 A. As was Cassandra Fairbanks.

2 Q. And Matt Couch was, too?

3 A. Yes.

4 Q. And the --

5 A. As was Kim Dotcom.

6 Q. Kim Dotcom.

7 And the reason that Mr. Butowsky wanted to
8 procure the support of social media influencers was
9 because he wanted to amplify his allegations that
10 Seth Rich and Aaron Rich had been involved in -- were
11 involved in hacking the DNC emails.

12 A. I think it was for him to be the whole face
13 of the Seth Rich investigation. That it -- it
14 could've been even beyond that. It could've been
15 narcissism, pure and simple.

16 Q. Your understanding was Mr. Butowsky wanted
17 to be known for...

18 Was it your understanding that Mr. Butowsky
19 wanted to be known as the person who was front and
20 center in pushing the allegations that Seth Rich and
21 Aaron Rich had been involved with the DNC emails?

22 A. I think that was part of it. I think that
23 he wanted to definitely finger them as the ones who
24 dropped the DNC emails, because he believed he was
25 fighting Russiagate.

1 So it was -- that narrative was very
2 important to promote.

3 Q. Okay. So the -- I want to understand this
4 some more.

5 So am I understanding your testimony
6 correctly, that it was your understanding that
7 Mr. Butowsky wanted to lead the charge on the
8 allegations against Seth Rich and Aaron Rich, because
9 that was a counternarrative to the Russia narrative?

10 A. Yes.

11 Q. And what's the basis of that understanding
12 that you have?

13 A. He said it. It came out of his mouth
14 multiple times. He would say, the Russian thing is
15 fake. He would say, that's being pushed and promoted
16 through John Brennan. He had it in for John Brennan,
17 big time. Didn't like him. Couldn't stand Obama.

18 He felt that by pointing the finger at
19 Seth Rich as the leaker, that that would take away
20 the engine power, the horsepower of the Russian
21 collusion argument.

22 Q. Yeah.

23 So in other words, if -- if -- if
24 Mr. Butowsky could get people to believe that
25 Seth Rich and Aaron Rich had been involved in hacking

1 the DNC emails, then that would provide a
2 counternarrative to the public reporting that Russia
3 had hacked the emails.

4 A. Yes.

5 Q. And you said Mr. Butowsky conveyed that to
6 you a number of times.

7 A. Yes.

8 Q. And when -- when did he first convey that to
9 you?

10 A. On the 20th of September, he later conveyed
11 it at -- during lunches at his country club. We must
12 have had three, four, maybe five lunches there. And
13 it was a constant narrative.

14 As was his disdain and anger at Joel Rich.

15 Q. Uh-huh.

16 Did he say why it was so important to him to
17 undermine the allegation that the Russians had hacked
18 the DNC emails?

19 A. No. But I could only surmise that he
20 could've been working for Sheldon Adelson, who is the
21 billionaire owner of Las Vegas Sands, among other
22 things.

23 He had mentioned -- Ed had mentioned that
24 Sheldon was his biggest client. He could've been
25 working for Steve Bannon. So we don't know.

1 Q. Did Mr. Butowsky, at any point, tell you
2 that he'd had conversations with anybody in the
3 White House about Russia's involvement in hacking the
4 DNC emails, or his allegations that Seth Rich and
5 Aaron Rich were involved?

6 A. Spicer. Yeah. I think he said he had a
7 conversation or a meeting with Spicer.

8 Is it Sean Spicer?

9 Q. Do you -- you have a recollection of
10 Mr. Butowsky telling you about a meeting he had with
11 Sean Spicer?

12 A. Yes.

13 Q. And what do you remember Mr. Butowsky
14 telling you about that?

15 A. That he was very open to what was going on.
16 That Sean Spicer was.

17 Wow. I just remembered this.

18 Q. So -- and when did Mr. Butowsky tell you
19 about his meeting with Mr. Spicer?

20 A. It must have been in September. Must have
21 been.

22 Q. At the meeting at his house?

23 A. Yeah.

24 Q. And do you recall what Mr. Butowsky said
25 about the meeting?

1 A. He said Sean was a very professional guy,
2 and that he had met him with someone else. He
3 might've gone there with record Wheeler.

4 Q. Gone where?

5 A. Gone to meet Sean Spicer at the White House.

6 Q. At the White House?

7 A. Yeah.

8 Q. Do you -- did Mr. Butowsky tell you when
9 that meeting took place?

10 A. I don't remember.

11 Q. But you --

12 A. I -- I just remember this part.

13 Q. Yeah. And you --

14 A. Yeah.

15 Q. But you do remember -- so you remember
16 Mr. Butowsky telling you that he and somebody else,
17 perhaps record Wheeler, met with Sean Spicer in the
18 White House to discuss Seth Rich and Aaron Rich's --

19 A. Yes.

20 Q. -- alleged involvement in hacking the DNC
21 emails?

22 A. Exactly.

23 Q. If we wanted to understand more about the
24 conversation between Mr. Butowsky and Mr. Spicer, how
25 could we do that?

1 A. I suppose that there would be logs at the
2 White House that would indicate the date.

3 Mr. Spicer would probably have to fill out
4 some sort of short form. And so you do a Freedom of
5 Information Act.

6 Q. We would probably -- we'd probably need to
7 depose Mr. -- take Mr. Spicer's deposition; right?

8 A. Yeah.

9 Q. What else do you remember about -- did --
10 did Mr. Butowsky -- on how many occasions did
11 Mr. Butowsky tell you about his conversation with
12 Mr. Spicer?

13 A. Just once.

14 Q. Uh-huh.

15 A. So it's good that I remembered it.

16 Q. So I think you -- your testimony was that
17 Mr. Butowsky had said, on a number of occasions, that
18 he wanted to undermine the public narrative that
19 Russia had hacked the DNC emails --

20 A. Exactly.

21 Q. -- is that right?

22 Yeah.

23 A. He had a special animus towards
24 Rachel Maddow and CNN.

25 And so he said, they're all in lockstep with

1 the Russian collusion thing, and it's to basically
2 unelect Trump.

3 Is it okay to use the restroom really
4 quickly?

5 MR. RILEY: We can take a break. Sure.

6 THE VIDEOGRAPHER: Okay. We're going off
7 the record at 3:41.

8 (Short recess.)

9 MR. RILEY: Are we good to go?

10 THE VIDEOGRAPHER: We are back on the record
11 at 3:47 p.m.

12 BY MR. RILEY:

13 Q. Mr. Schoenberger, you understand that you're
14 still under oath?

15 A. Yes.

16 Q. And we didn't speak while we were off the
17 record about your testimony, at all; correct?

18 A. Correct.

19 Q. Okay. Before we went off the record, you
20 were explaining that Mr. Butowsky had said on a
21 number of occasions, that he was concerned about
22 allegations that Russia and the president had
23 colluded to hack the DNC emails.

24 Correct?

25 A. Yes.

1 Q. Okay. And am I correct that Mr. Butowsky
2 told you that if -- if it were, instead, the case
3 that Seth Rich and Aaron Rich had hacked the DNC
4 emails, that it would undermine the Russia collusion
5 story?

6 A. Here's the thing. He never said -- he never
7 made that connection. It's obvious now.

8 Q. And why do you say it's obvious now?

9 A. I think any fifth grader could figure that
10 out. He's a man who was -- he was telling people he
11 was dedicated to finding the truth.

12 But every statement he would repeat to
13 strangers, you know, these guys leaked it to
14 WikiLeaks, and we're getting to the bottom of it with
15 Joel Rich.

16 Q. Uh-huh.

17 A. So even the fact that he would try to
18 commence these surveillance operations, even if it
19 wasn't successful, it had the allure to get people
20 interested. And then he can tell his narrative again
21 and again and again.

22 Q. Because telling people that he had a basis
23 to believe that Seth Rich and Aaron Rich were
24 involved in hacking the DNC emails, would have the
25 effect of undermining the Russia collusion narrative.

1 A. Yes.

2 Q. Right.

3 We talked earlier about an Admiral Lyons?

4 A. Yes.

5 Q. Aside from the conversation -- well, do you
6 know -- do -- strike that.

7 Do you have an understanding as to when
8 Mr. Butowsky came to know Admiral Lyons?

9 A. No. I have no knowledge of his background.

10 Q. Okay. And when was the first time that
11 Mr. Butowsky told you about Admiral Lyons?

12 A. That would've been on the 20th.

13 Q. Okay.

14 A. At that meeting.

15 Q. Yeah.

16 And did Mr. Butowsky say anything to you on
17 September 20th about Admiral Lyons and a potential
18 article involve- -- about Seth Rich and Aaron Rich?

19 A. Not at that time, he didn't.

20 What he made clear was that he was the
21 ghostwriter for whatever he was putting in front of
22 me.

23 Q. Mm-hmm.

24 A. Yeah.

25 Q. And the thing that he put in front of you at

1 that point was an article about Israel?

2 A. I don't know if it was about Israel. I
3 think it was something that had to do with
4 patriotism. And it may have mentioned Israel.

5 Q. Okay.

6 A. And it sounded like he was, you know, kind
7 of parroting what's out there. You know, Israel is
8 our greatest ally, you know, so on and so forth.

9 Q. Mm-hmm.

10 The article that he showed you wasn't about
11 Seth Rich and Aaron Rich at that point?

12 A. I don't think it was.

13 Q. Right.

14 Subsequently did Mr. -- subsequent to the
15 September 20th meeting, did Mr. Butowsky ever tell
16 you anything about an article under Admiral Lyons'
17 name about the Riches?

18 A. No, he didn't.

19 Q. Okay.

20 I'm going to show you --

21 Mark --

22 I'm going to mark this as the next exhibit.

23 THE REPORTER: Exhibit I.

24 MR. RILEY: I?

25 ///

1 (Deposition Exhibit I was marked for
2 identification by the court reporter.)

3 BY MR. RILEY:

4 Q. Have you -- Mr. Schoenberger, have you ever
5 seen this document?

6 A. As a matter of fact, I did see this. I did
7 see this.

8 Q. Does this refresh your recollection --

9 A. Yes, it does.

10 Q. -- as to --

11 Well, why don't you just -- why don't you
12 tell me. What's your -- what's your understanding of
13 what this document is?

14 A. He showed this when we -- when he took us
15 for breakfast at his country club.

16 And he started cutting down Brad Bewman
17 [sic]. And he was asking us to find out as much as
18 we could about Brad Bewman.

19 He was full of anger and full of hate at
20 Brad Bewman.

21 Q. Mm-hmm.

22 A. So I do remember this.

23 Q. Do you mean Brad Bauman?

24 A. Bauman, yeah.

25 Q. So you remember -- so this is an article --

1 let's just establish what this is.

2 So this -- so this is an article titled
3 "More cover-up questions. The curious murder of
4 Seth Rich poses questions that just won't stay under
5 the official rug."

6 Do you see that?

7 A. Yes.

8 Q. And you see the finalize by James A. Lyons?

9 A. Yes.

10 Q. And that's Admiral Lyons about whom we've
11 been talking today; yes?

12 A. Yes.

13 Q. And it's dated Thursday, March 1st, 2018?

14 A. Yep.

15 Q. Okay. So do you have a recollection of any
16 conversations that you had with Mr. Butowsky about
17 this article?

18 A. I do. He showed it to me at the country
19 club.

20 Q. Do you remember when he showed it to you?

21 A. First week of March? Maybe even March 2nd,
22 March 3rd.

23 Q. So after it had been published?

24 A. Yes.

25 Q. Did Mr. Butowsky ever show you a copy of

1 this article before March 1st?

2 A. No.

3 Q. Did Mr. Butowsky say anything as to whether
4 he was, in fact, the author of this article?

5 A. No. I wish he did, but no.

6 Q. Did he say that -- what did he tell you
7 about this article?

8 A. He said, take a look at this, things are
9 heating up, and they're about to get a lot hotter.

10 Q. And just to be clear, Mr. Butowsky didn't
11 deny that he had written this article; right?

12 A. He didn't deny.

13 Q. He didn't say, one way or the other, whether
14 he had written this article; correct?

15 A. That's my recollection. Yeah.

16 Q. All right. And previously, Mr. Butowsky had
17 told you that he had an arrangement with
18 Admiral Lyons, whereby Mr. Butowsky would write
19 articles for Admiral Lyons.

20 A. Exactly.

21 Q. And is this -- is this of the nature -- is
22 this of the type of article that Mr. Butowsky said he
23 had written for Admiral Lyons?

24 A. Oh, absolutely.

25 Q. Okay.

1 A. If I could make a suggestion, you could use
2 an algo to go through both Lyons' earlier works, 10,
3 20 years ago and look at the transitive verbs, and
4 whatnot here, and compare it with Ed's financial
5 writing, which he's -- he has been a writer. And I
6 think you'll find a bullseye.

7 Q. So in other words, we could use algorithms
8 to determine whether this article is written in
9 Admiral Lyons's voice or in --

10 A. Yes.

11 Q. -- Mr. Butowsky's?

12 A. Absolutely. Yeah.

13 Q. It's actually a good idea.

14 A. Always happy to help.

15 And when he showed it to me, he basically --
16 the one big comment that he made is, we need to get
17 rid of the agree, and get someone in there as to do
18 the job.

19 Q. And you said you remember being -- what else
20 do you remember him saying about this article? He
21 said, things are going to get hotter?

22 A. Yeah. He said things are heating up, and
23 they're about to get hotter.

24 And I said, what do you mean?

25 He said, I made some plans. Yeah. And he

1 said, you know, I work with Gateway Pundit. I work
2 with Cassandra Fairbanks, I can make a noise when I
3 need to.

4 Q. He said he could make noise when he needed
5 to?

6 A. Yeah.

7 Q. And was the point that he was using this
8 article to make noise about Seth Rich and
9 Aaron Rich's --

10 A. Yeah.

11 Q. -- alleged involvement --

12 A. Yeah.

13 Q. -- with the DNC emails?

14 A. Yeah. He said it's all coming out.

15 I said, things need to be real.

16 And he said, what do you mean?

17 I said, you have a Dallas magazine article
18 that claims you've got 3 billion under management. I
19 said, try half a million.

20 And he got really angry with me.

21 Q. Is that --

22 A. How did you find that out?

23 Q. That was during this -- the
24 conversation around this?

25 A. Mm-hmm.

1 Q. Is it your understanding that Mr. Butowsky
2 has misrepresented the amount of assets he has under
3 management?

4 A. Exactly.

5 Q. What's the -- your basis for that?

6 A. Had a friend do some research.

7 Q. Mm-hmm.

8 A. And the friend is connected and credible.

9 And when I mentioned that to the him, he said --
10 first he got angry.

11 Then he said, well, there's a bunch of
12 assholes at those magazines. They -- they don't like
13 me anymore.

14 So he had a problem with, you know, Dallas
15 magazine.

16 Q. I want to show you another document.

17 Oh. Before I do that, the -- the article
18 that we were just looking at, did you ever have any
19 conversations with Matt Couch about that article?

20 A. No.

21 THE WITNESS: Thank you.

22 THE REPORTER: Exhibit J.

23 (Deposition Exhibit J was marked for
24 identification by the court reporter.)

25 ///

1 BY MR. RILEY:

2 Q. Do you see in this Exhibit J on the bottom
3 of the first page, there's an email from Th Stg,
4 dated June 5th at 8:10 a.m.

5 Do you see that?

6 A. Yes.

7 Q. And is that -- this is an email that you
8 sent?

9 A. Absolutely.

10 Q. Okay. And you see, on the -- if you flip
11 over to the second page toward the bottom of the
12 email that you sent --

13 A. Wow, this is great.

14 Q. Yeah.

15 And toward -- so toward the bottom, it says,
16 "As I told you last October, Manuel Chavez was
17 plotting with others at the direction of Ed to hack
18 and stalk the Seth Rich family."

19 Do you see that?

20 A. Mm-hmm.

21 Q. Is that a reference to the September 20th,
22 2017 meeting we were talking about?

23 A. Exactly.

24 Q. Okay. And can you explain what you were
25 describing in that sentence?

1 A. That this is exactly what I was saying with
2 the spy van -- oh, this is good.

3 I'm really happy. All right. I -- I was
4 looking everywhere for this.

5 This is...

6 So yeah. It's exactly what I was saying,
7 which is at Ed's direction, Manny Chavez was going to
8 go do this. Oh, this is beautiful.

9 Q. And so this -- this is an accurate
10 description of what happened during that meeting on
11 September 20th?

12 A. Yeah.

13 Q. Okay. And then --

14 A. Hundred percent.

15 Q. And then in the next -- in the -- if you go
16 up an email in the -- in the exchange, there's a
17 email June 5th, 2018, at 8:20 a.m.

18 Do you see that? It's on the first page,
19 the -- it's the second email.

20 A. Okay.

21 Q. At 8:20 a.m.

22 Do you see that?

23 A. Yes.

24 Q. Okay. And that's -- this is also an
25 email --

1 A. Yes.

2 Q. -- that you wrote?

3 A. Yes.

4 Q. And do you see the fifth line down, it says:

5 "Sorry it's coming to this, but I was there
6 with Manny and Ed and Matt when they discussed
7 getting a spy van and driving to Nebraska and hacking
8 Joel Rich."

9 You see that?

10 A. Yeah.

11 Q. And Matt in that sentence is referencing
12 Matt Couch?

13 A. Matt was present when it was being
14 discussed.

15 Q. Matt Couch?

16 A. Matt Couch.

17 Q. And Ed is a reference to Ed Butowsky?

18 A. Yes.

19 Q. And Manny is Manuel Chavez?

20 A. Yes.

21 Q. And that's an accurate description of what
22 happened during the September 20th meeting?

23 A. Exactly.

24 Q. And then down, the last paragraph, the last
25 sentence, it says:

1 "It was first discussed in a room with you,
2 me, Trevor, Joe, Matt, his friend and Ed."

3 Do you see that?

4 A. Yes.

5 Q. And again, that's an accurate description of
6 what happened during the meeting on September 20th of
7 2017?

8 A. Yes.

9 Q. Okay. Gonna show you another document.

10 Does that -- as you're reading that
11 document, does it refresh your recollection as to any
12 additional events or occurrences during the
13 September 20th meeting that we've not discussed so
14 far today?

15 A. No. But I'm really -- I'm really pleased
16 that this has came [sic] up, you know.

17 Q. Why is that?

18 A. Because it's the exact same story that I've
19 been telling from the very beginning. This is
20 June 5th, 2018. This was -- on June 5th, 2018, was
21 when I -- I had gotten back from Mexico where I had
22 pneumonia last year. This is reoccurring.

23 I had no communications in Mexico. I only
24 had my phone, and it didn't work. And on June 5th,
25 2018, I also sent an email to Stuart Blaugrund. I

1 had been in Mexico for three weeks. And a day or two
2 before that, Ed had asked me to falsely accuse
3 Stuart Blaugrund of rape.

4 I had written him an email stating, this is
5 what's going on.

6 So this is really good news. It's good news
7 for you guys.

8 Q. Okay. Why don't -- so we're going -- we're
9 going to have some questions about this Stuart
10 Blaugrund situation that we'll come back to in a bit.

11 I want to ask you first about the document I
12 just put in front of you --

13 I think is marked as Exhibit K, as in
14 "kilo"?

15 THE REPORTER: Yes.

16 (Deposition Exhibit K was marked for
17 identification by the court reporter.)

18 BY MR. RILEY:

19 Q. And you take a moment to look at that
20 document. Let me know once you've had a chance to
21 review it.

22 A. Yeah.

23 (Reviewing document.)

24 God, so help me, I thought I'd lost all
25 this.

1 Q. Have you had a chance to review the --

2 A. Yeah.

3 Q. -- document?

4 Is -- is the description in this document an
5 accurate description of what happened during the
6 meeting on September 20th of 2017?

7 A. Yes. The only problem is -- is that I had
8 it recorded. I can't find the recording. I -- I had
9 a little tiny micro recorder, and I looked
10 everywhere.

11 Now, I believe that Defango stole it from me
12 in Texas, along with \$300 and with a Buffalo nickel,
13 too. But I had 14 minutes of the meeting recorded.

14 Q. And how did you record -- how did you record
15 the meeting?

16 A. A tiny 45-dollar micro recorder.

17 Q. Uh-huh.

18 And what was it that prompted you to record
19 a portion of the meeting?

20 A. When I started to feel like what was being
21 discussed was going south, Ed had basically started
22 to show anger at Josh and -- or not Josh -- at -- at
23 Joel Rich. And then he had said something that
24 triggered me, and I thought, okay, this is not right.

25 So I reached in, I did this (indicating) --

1 Q. Uh-huh.

2 A. -- did the recording, muffled at times. And
3 then when I was outside with Beth, I showed her the
4 recorder --

5 Q. Uh-huh.

6 A. -- too.

7 We had a cigarette on the outside.

8 Q. Do you remember what it was that triggered
9 you to start recording the conversation?

10 A. He had said, I would like to find someone
11 who -- who could kill Chris Cuomo.

12 And so I thought, okay. That's pretty
13 weird.

14 And then Joe Berkell had basically mentioned
15 Eric Prince as his employer, or something like that.
16 So I thought this is nothing like the meeting that I
17 expected.

18 Betsy DeVoss, Eric Prince's sister, tied in
19 with that.

20 So, you know, I've had meetings with
21 Pentagon, and I've always -- they were always
22 recorded. I noticed nobody was recording there. And
23 I felt that for my own safety and for that for the
24 girl I loved, I better record it.

25 So I had 13 minutes, 52 seconds on that

1 recorder. And that recorder was missing along with
2 \$300, along with a Buffalo head nickel that I'd
3 gotten in change that I was going to give my son.
4 And the only one in the room there was Defango.

5 Q. Did you -- what -- what was that -- is it
6 your standard practice to carry recording devices
7 with you to meetings?

8 A. There was enough weirdness with Trevor.
9 I -- it's not my standard of practice.

10 Q. Mm-hmm.

11 A. But I felt I wanted to do that. Plus I
12 didn't bring it to necessarily surveil.

13 Q. Mm-hmm.

14 A. That wasn't it.

15 It was to go ahead and get notes while we
16 were developing ideas and go, okay, we're going to do
17 this and that. Because it was a first time that
18 we're meeting. The first time that I met Trevor,
19 first time I'd met Beth, first time I had met Ed,
20 too.

21 Q. Had -- was it your practice to use a
22 recording device as a -- essentially a note-taking
23 mechanism in other meetings?

24 A. I ran a company called North Bay
25 Entertainment. And I used -- so I got a bunch of

1 these things. And I would dictate letters, I would
2 give it to a secretary, and she would write it up.
3 So it's kinda what I'm used to.

4 Q. And at that meeting on September 20th, when
5 you had the recording device, where on your person
6 were you keeping the recording device?

7 A. Right here (indicating). I had a jacket on.

8 MR. RILEY: And for the record, the witness
9 is pointing to the breast pocket.

10 THE WITNESS: Left breast.

11 BY MR. RILEY:

12 Q. And so were you -- so a reference was made
13 to a potential assassination attempt?

14 A. He said it. He said, I need someone to
15 whack Chris Cuomo.

16 And -- and here I am. I'm looking at the
17 guy who looks like Rodney Dangerfield. And I'm
18 thinking, oh, shit.

19 And so I look over at -- at Beth. I'm
20 trying to get her attention. We're in a fight;
21 right? So I click it over -- I know. I know. I
22 know.

23 So here's the thing. I -- I must have
24 played that thing over and over 20, 30 times. And it
25 was -- and it -- it was muffled but -- and she

1 thought I was kidding. I -- I -- I'm not.

2 Q. So you -- you shared the -- you shared
3 the -- the recording.

4 And when it says 14-minute video, it's
5 actually a reference to a recording.

6 A. It's a reference to the recording.

7 And then, one time, I said, hold on, Beth,
8 let me play for it.

9 I go like this, up to the phone, I'm playing
10 it, and when I get done with it, she's not on the
11 line. She had hung up.

12 Q. And what's your recollection of what was on
13 the recording?

14 A. I can tell you what was on there.

15 It was Ed basically -- it's everything that
16 I've been saying. It was Ed saying, this is what
17 we're doing. We have Manny saying, great, I'm up to
18 it, let's definitely do this.

19 You know, look. Yeah, the shady stuff, and
20 I want no part of it. I'm a privacy freak, and this
21 is illegal.

22 Q. Mm-hmm.

23 A. I also said, I'm cicada, for God's sake.
24 That's another --

25 Cicada's a puzzle that I invented.

1 And then, here. Matt is heard saying, I
2 don't know, Ed. Seems like my team could get into
3 hot water, but I will check with" -- and it -- it was
4 "I," and that could've been "Ty."

5 Q. Mm-hmm.

6 A. But that was later in the recording.

7 This was the last thing on it.

8 Q. Do you know if the -- the -- you've
9 referenced somebody named Ty a number of times today.

10 Is that a -- do you know if that's
11 Ty Clevenger?

12 A. That's the guy.

13 Q. Yeah?

14 A. Was he CIA? Or a lawyer?

15 Q. Is --

16 A. Both.

17 Q. Is -- is the -- is the Ty Clevenger that --
18 or is the person's whose named Ty, who you've
19 referenced a number of times today, somebody who is
20 either a lawyer a former --

21 A. Or CIA.

22 Q. Uh-huh.

23 A. You know, I couldn't figure it out.

24 But Ed mentioned that name.

25 Q. And the name was -- was Ty Clevenger?

1 A. Yeah.

2 Q. And he was either a lawyer or an
3 intelligence community --

4 A. Yeah.

5 Q. -- officer?

6 A. Exactly.

7 Q. And so Matt Couch said, I don't know, Ed, it
8 seems like my team could get in hot water, but I will
9 check with Ty?

10 A. Yeah. But this is after -- here's the way
11 that the recording went.

12 You have it absolutely clear with Manny.
13 And then you have about, literally, ten minutes of,
14 shhhhh, you know, all of -- all that crap and muffle
15 stuff.

16 And then the next thing that comes up is
17 Matt saying, I don't know, it seems like I could get
18 in hot water. Let me check with, and shhhhh, like
19 that. And then the thing ended.

20 It was -- it was almost 14 minutes. It was
21 13 minutes and 52 seconds.

22 Q. Uh-huh.

23 And where did -- was the recording on an
24 actual, like, physical cassette? Or was it --

25 A. It was on a little, tiny micro, too. And it

1 was a device that I had bought at Office Depot a long
2 time ago --

3 Q. Uh-huh.

4 A. -- for, like, \$45.

5 Q. And you don't have a backup of the
6 recording?

7 A. No.

8 Q. Uh-huh.

9 Do you -- and you said you shared the
10 recording with Beth?

11 A. I started to play the recording. I played
12 her the whole thing. She had hung up at some point.
13 She could've hung up at the very beginning. But I
14 told her repeatedly. I told her five times that I
15 had this thing.

16 Q. Did you ever play the recording for anybody
17 else?

18 A. No.

19 Q. And where did you store the recording?

20 A. It was with me at all times. And I also
21 recorded Linda Barrett screaming --

22 Can I check my computer?

23 Q. Right now, I just want to ask you based on
24 your current recollection. But there's documents --
25 or let me ask you this.

1 Do you think you have documents that would
2 refresh your recollection as to your testimony?

3 A. Yeah. I -- I might have the recording.

4 Q. The 14-minute recording.

5 A. Yeah.

6 Q. On your computer?

7 A. Yeah. 'Cause I record it on the same one
8 that I recorded Linda going crazy.

9 Q. Okay.

10 A. And I think I --

11 Can I look?

12 Q. Yeah. Why don't we --

13 A. 'Cause if I can nail this, it'll be good.
14 Just take a sec.

15 Q. I'm just trying to think for a second.

16 Is -- for you to find the recording, is it
17 just a matter of going through your files?

18 A. It's really quick.

19 Q. Okay. I'm going to stay on the record for
20 this.

21 A. 'Cause what I -- on the recording, I
22 recorded everything that would've been dangerous or
23 deleterious --

24 Q. Uh-huh.

25 A. -- to me.

1 So I've got Linda -- I -- I had a crazy
2 landlord.

3 (Recording playing.)

4 THE WITNESS: Okay. This is Linda. This is
5 my landlord.

6 BY MR. RILEY:

7 Q. Is this the 14-minute?

8 A. No.

9 Q. Do you -- do you have that one?

10 A. That's what I'm going to look.

11 (Recording playing.)

12 THE WITNESS: It's the same recording
13 device. This is when she tried to kill herself.

14 (Recording playing.)

15 THE WITNESS: I think I can get this for
16 you.

17 BY MR. RILEY:

18 Q. The 14-minute recording?

19 A. Yeah.

20 (Recording playing.)

21 THE WITNESS: She's mad at me for smoking.
22 Okay. This could be that.

23 (Recording playing.)

24 THE WITNESS: Yeah. No, that's her again.
25 Hmm. Oh, man. All right.

1 (Recording playing.)

2 THE WITNESS: This is a Shadowbox thing,
3 so...

4 MR. RILEY: Okay.

5 Q. Is --

6 (Recording playing.)

7 THE WITNESS: Yeah.

8 (Recording playing.)

9 THE WITNESS: John Bolton's number. So I
10 was recording them.

11 BY MR. RILEY:

12 Q. So -- so did -- are -- is --

13 I just want -- just pause for a second.

14 Are -- is it your -- are you now recalling
15 that you had backed up recordings from this device
16 onto your laptop?

17 A. I was recording on my phone and on the
18 device. I have to look for it. I may not have put
19 that on there. But what I did is...

20 (Recording playing.)

21 THE WITNESS: Okay. That's another one with
22 her.

23 I hope I can find it. I'd love to give it
24 to you.

25 ///

1 BY MR. RILEY:

2 Q. Why don't -- let -- let's do this, then.

3 So is it -- what -- what you're doing is
4 searching your records for a potential backup of the
5 14-minute recording that's referenced in Exhibit K?

6 A. Yeah.

7 Q. Yes?

8 Why don't we go off -- how long do you think
9 it would take you to -- to search for this?

10 A. It would be here. It could be on another
11 computer.

12 Q. Okay.

13 A. Rather Apple.

14 Q. Okay.

15 A. I just gotta check it --

16 Q. Okay. But --

17 A. -- to --

18 Q. But your recollection is that you backed
19 up -- that you may have backed up the recording --

20 A. Yes.

21 (Recording playing.)

22 BY MR. RILEY:

23 Q. -- that's referenced in Exhibit K.

24 A. Yeah.

25 Q. Okay.

1 A. This could be good.

2 Q. When we take a -- when we take a break, why
3 don't you check and see if you can find the backup of
4 the recording.

5 A. I'm going to -- I just checked this one. I
6 have one from him where he's got John Bolton's
7 number.

8 Q. Uh-huh.

9 A. He's calling John Bolton.

10 Q. Who is "he"?

11 A. Ed.

12 Q. And do -- do you remember what Mr. Butowsky
13 was calling Mr. Bolton about?

14 A. To prove that he knew him.

15 Q. Oh. So you -- you recorded Mr. Butowsky
16 calling Mr. Bolton?

17 A. Yeah. He just -- he left a message --

18 Q. Mm-hmm.

19 A. -- too.

20 But I'm going to have to look at another
21 computer.

22 I may have backed it up. There's a
23 50 percent chance that I've got the whole -- and it's
24 13 minutes and 52 seconds.

25 Q. Okay.

1 A. Can it be used in court, if they didn't know
2 they were being recorded?

3 Q. I'm going to show you another document.
4 Going mark that as -- I think that's Exhibit L, as in
5 "Lima."

6 (Deposition Exhibit L was marked for
7 identification by the court reporter.)

8 THE WITNESS: Okay. Yep, I stand by
9 every -- every single word.

10 BY MR. RILEY:

11 Q. Okay. That's -- my question is --
12 essentially is -- is what -- well, let's establish
13 what this is.

14 At the bottom of the document, there's an
15 email from June 1st, 2018, at 8:30 a.m. from
16 TStGermain@ProtonMail.com.

17 A. That's me.

18 Q. And this is an email that you sent; correct?

19 A. Yes.

20 Q. And is the -- what's written in the email an
21 accurate description of what happened at the
22 September 20th, 2017 meeting?

23 A. Yes. Well, Ed was meeting with Manny and I.
24 He would tell us we are his private militia.

25 No. That is not September 20th. That is

1 going into February and March.

2 Q. Right.

3 On the second page, it says:

4 "He also wanted to hire me to spy on the
5 Seth Rich family, and he said that to Manny and me.
6 I refused to do that. Beth, we were brought to
7 Dallas, given a hotel room and told to do illegal
8 shit. Manny was game. I was not. Manny and
9 Matt Couch were going to head to Nebraska and use a
10 remote tool to do this."

11 You see that?

12 A. Yeah.

13 Q. And all of that is an accurate description?

14 A. Yep.

15 Q. Okay. I'm going to show you one more.

16 And does -- does reading this email refresh
17 your recollection as to any additional events from
18 the September 20th meeting or afterwards?

19 A. I know as a fact that Beth was there and
20 heard it. I know as a fact that her and I had
21 multiple discussions about it. She was cognizant of
22 it. So she heard it, too, and we both agreed we
23 wanted no part of it.

24 So it's -- it's June 2019. Everything I put
25 in here going back to 2018 is consistent.

1 Q. And what was it that prompted you to write
2 these emails in June of 2018?

3 A. June 1st, she had told me to go down to
4 Mexico. And there was a person named Arturo
5 Tafiosky, who had two years of medical school, and he
6 would heal me; that -- that he would care for me
7 right now.

8 That was because on May 13th, Ed, when I
9 refused to set Stuart up with child porn or fake rape
10 charges, he threw me out of the hotel, sick as a dog.

11 So with Beth, we were dating. And she said,
12 I've set it up for you to go down there.

13 I went down there and --

14 (Reporter clarification.)

15 THE WITNESS: She said, I want you to go
16 down. Arturo will take care of you.

17 Arturo ended to be an absolute monster. The
18 first thing he did when I got there is, he said he
19 had immediate debts. I had to give him \$200. Found
20 out he was an intravenous drug user. He was a heroin
21 addict. All he cared about were the drugs. It
22 was -- it was horrible.

23 On June 1st, I actually -- was the first
24 time that I had any Internet, because it was so
25 spotty.

1 Q. Yeah.

2 A. And I -- I wrote this. And on June 5th, I
3 went ahead and followed through with what I said I
4 was going to do, contact Stu Blaugrund --

5 Q. Mm-hmm.

6 A. -- Stuart Blaugrund, and telling him
7 everything.

8 So this was -- I want to get the timing
9 right.

10 May 13th, Ed asked me to set Stuart
11 Blaugrund up. I take off. I can't even speak. I
12 was like, "hello," you know, godfather; right?

13 I go off -- because Ed throws me out of the
14 hotel. I go to Mexico. I'm there till June 2nd. On
15 June 1st, my -- my -- my phone, I can finally get a
16 hot spot, sent out this email.

17 Did I use Arturo's computer? I forgot
18 which.

19 But the bottom line is, I sent it out. I
20 said, here's what going on.

21 What pissed me off about Beth is in an
22 effort to be left alone, she hasn't told the truth.
23 She was in there; we discussed it. Now, all of a
24 sudden, she says it never happened.

25 Q. Mm-hmm.

1 A. You know. And the bottom line is, it did.

2 Q. And by -- and by "it never happened," you're
3 referencing the plans --

4 A. September 20th plot to surveil --

5 Q. Yeah.

6 A. -- the Rich family in Omaha, Nebraska, the
7 plot to get into Aaron Rich's bank records.

8 Q. Mm-hmm.

9 A. So this stuff happened.

10 Q. Mm-hmm.

11 A. And --

12 Q. And you -- you talking about the
13 circumstances leading to -- is it --

14 Well, let me back up.

15 So at some point in early 2018, you
16 relocated to Texas to work for Mr. Butowsky?

17 A. Yes. That would've been February 3rd. We
18 were supposed to be there for three months.

19 Q. Uh-huh.

20 A. So we went through February. We went
21 through March.

22 On April 2nd, Manuel Chavez left after
23 having these covert meetings with Ed.

24 Meanwhile, I had been developing a program
25 to make Rabbi Paley --

1 Q. Mm-hmm.

2 A. -- popular.

3 And I had another person, Marty -- I forgot
4 his last name -- down in Florida that was a friend of
5 Rabbi Paley.

6 So the company was starting to go in the
7 direction that I wanted it to go, which is peace,
8 creativity, nice stuff. Not all this, you know,
9 utterly crap.

10 Q. And -- and would -- so describe your -- your
11 day-to -- were you staying at a hotel when you were
12 in Texas --

13 A. Yes.

14 Q. -- at that point?

15 Were -- were you in a room with Mr. Chavez?

16 A. I was in a room with Mr. Chavez. Mr. Chavez
17 would livestream all night. He was constantly on the
18 hunt for drugs. He ended up scoring drugs from -- I
19 think marijuana, from a lady named Laurie Smith, who
20 goes by the name "Majestic Angel" online.

21 We -- we clashed, because I was up early in
22 the morning with a suit, ready to meet clients. He
23 didn't want to meet people on time.

24 We met with one client who had a beverage,
25 like a water with electrolytes. He told that client

1 that he invented Bitcoin.

2 Q. Mm-hmm.

3 A. And Blockchain.

4 So here I am, completely embarrassed that
5 this guy is blatantly lying.

6 Q. Was Mr. Chavez, during that period,
7 having -- continuing to have meetings with
8 Mr. Butowsky?

9 A. Yes.

10 Q. And do you know -- were you also having
11 meetings with Mr. Butowsky?

12 A. Probably one to every four that he did.

13 Q. Uh-huh.

14 And when you were meeting with Mr. Butowsky,
15 what -- what were those meetings about?

16 A. About Rabbi Paley, about what we could do
17 for this movie. He would talk to me about, you know,
18 nonsurveillance stuff.

19 So he had, basically, created a demarcation
20 where he talked to me about the white hat things.
21 And he talked to Manuel about, you know, all the
22 shady stuff they were going to do.

23 Q. Did you have conversations, during that
24 period of time, with Mr. Butowsky about Seth Rich and
25 Aaron Rich?

1 A. No. I had really started to concentrate on
2 his rabbi, on trying to develop business models that
3 he said were boring, but I felt would be good for the
4 company.

5 And I said, what does it matter if it's a
6 revenue-producing company?

7 Q. Yeah.

8 A. And he said, well, it was supposed to be
9 militia, you know.

10 Q. Was it your understanding that Mr. Butowsky
11 and Mr. Chavez were having conversations about
12 Seth Rich and Aaron Rich during that time?

13 A. Yes. Manuel came back. And he basically
14 said as much.

15 Q. And what did he say?

16 A. He said, we're doing the men's work.

17 Q. The what -- the --

18 A. The men's work. You know, you -- you get to
19 go ahead and do the "fairy work." That was his
20 words.

21 Q. Did -- did Mr. Chavez, during that period,
22 ever talk to you about the article that we looked at
23 earlier by Admiral Lyons?

24 A. No.

25 He said Ed -- Ed was going to make him very

1 famous. He said Ed was getting him some very
2 expensive equipment.

3 He said that he had worked on all of Ed's
4 computers and had it set up. And he said that he's
5 teaching Ed about surveillance and hacking.

6 Q. Mm-hmm.

7 A. Then he told me he had hacked me.

8 Q. Had they, in fact, hacked you?

9 A. Yeah.

10 Q. How do you know that?

11 A. Because he showed me emails that he -- that
12 taunted when he -- when I threatened to expose what
13 him and Ed were doing, he basically read off some
14 things that were private between Beth and I. And
15 then, he basically said, we're going to ruin your
16 life, boy.

17 And then, he proceeded to do it. He did
18 over 75 videos on me.

19 He -- there was a guy named Isaac Kappy, who
20 died May --

21 (Reporter clarification.)

22 THE WITNESS: Kappy, K-a-p-p-y.

23 -- who died mysteriously on May 13th. He
24 has put out that I am the murderer. He has tried to
25 stalk my child.

1 It's pretty -- pretty sick stuff.

2 And he told me -- way back in April, he
3 said, Ed and I are going to do a number on you.
4 We're going to dox Beth. We're going to dox you.

5 And she became suicidal. So it's --

6 Q. Dox, what -- it was --

7 A. "Dox" is to expose with either factual or
8 incorrect information.

9 Q. Mm-hmm.

10 A. So if I was to dox someone, I could say
11 anything I want but make it public.

12 Q. Mm-hmm.

13 A. And it's -- it's a form of cyberbullying.

14 Q. Mm-hmm.

15 A. So that was that.

16 And the whole point was to intimidate. And
17 what he didn't want is, he didn't want me going to
18 the police to tell them about the Riches.

19 Q. And so were they -- they were using
20 information that they had acquired about you and the
21 conversations you were having with Beth to deter you
22 from going to law enforcement?

23 A. Yes. I've given Mr. Gottlieb a -- what they
24 call a streamable, which is Beth having an interview
25 with this guy, Nathan Stolpman, where she even says,

1 this is what he was trying to do.

2 Q. Mm-hmm.

3 A. He terrified her.

4 He later made another video on
5 December 16th, 2018, where he said he was going to
6 hunt her and her family down, including her husband
7 and her small children.

8 Q. Mm-hmm.

9 A. He has mentioned her name as of yesterday,
10 where he mentioned mine. He mentions my name
11 publicly every day.

12 Q. Mm-hmm.

13 A. And this is all because I -- it's really
14 ratcheted up because I'm now submitting to depositions
15 with --

16 Q. Mm-hmm.

17 A. -- lawyers.

18 Q. I'm going to show you -- show you another
19 document.

20 A. Sure.

21 MR. RILEY: We'll mark this as Exhibit M, I
22 think, as in "Mike."

23 THE REPORTER: Yes.

24 (Deposition Exhibit M was marked for
25 identification by the court reporter.)

1 BY MR. RILEY:

2 Q. And let me know once you've had a chance to
3 review this.

4 A. (Reviewing document.)

5 Oh, God. This is great. Perfect.

6 Q. At the -- at the bottom of the first page is
7 an email, a long email, from Th Stg.

8 That's you; right?

9 A. Yes.

10 Q. It's dated June 15th, 2018, at 8:20 a.m.

11 Do you see that?

12 A. Yes.

13 Q. And it's addressed to Ed Butowsky?

14 A. Yes.

15 Q. And also Andrew Paley?

16 A. Yep.

17 Q. And Andrew Paley is who, again?

18 A. The rabbi.

19 Q. Right.

20 And this is an email that you did, in fact,
21 send; yes?

22 A. Yes, I sent it. I'm good for every word.

23 Q. Yep.

24 And on -- and -- and is this email an
25 accurate description of the events described in it?

1 A. Absolutely.

2 Q. And on the second page, in the second
3 paragraph, it says:

4 "You had tried to organize getting Manuel
5 and Matt Couch to Nebraska to remote-hack Joel Rich,
6 and you plotted this illegal act with five witnesses
7 in the room."

8 Do you see that?

9 A. Yep.

10 Q. And is that a reference to the
11 September 20th, 2017 meeting?

12 A. Correct.

13 Q. And is that an accurate description of the
14 meeting?

15 A. Yes. There were more witnesses than that,
16 but...

17 Q. Mm-hmm.

18 And then -- and does reading this email
19 refresh your recollection as to any other events that
20 occurred during that September 2017 meeting or any
21 other interactions you had with Mr. Butowsky?

22 A. No.

23 But there is something that I think you'll
24 find of interest.

25 Manuel Chavez publicly stated that I tried

1 to extort Ed of \$300,000. This is within three, four
2 days ago.

3 Q. Mm-hmm.

4 A. So you're also -- I'm going to tell you
5 another thing, too.

6 Do you see how on the top one, dated
7 November 23rd, atanya1111?

8 Q. Mm-hmm.

9 A. That's Steven Biss's wife, Tanya Cornwell.

10 Steve Biss represents Ed Butowsky in this
11 case against Charles Schwab and is pro per with his
12 own case.

13 Tanya approached me six weeks ago, and said,
14 Ed says that you owe \$5,000 to Rabbi Paley.

15 So we only took a 50 percent deposit, and we
16 paid Manuel, and then everything had to be paid back.

17 So Ed was obviously lying to Tanya about
18 that.

19 And then here's Beth telling me, you tried
20 to extort \$300,000 from Ed.

21 And of course, I did what an honest person
22 will to.

23 I went directly to Ed and said, that's
24 detritus.

25 And now, Manuel Chavez, in continuing the --

1 the intimidation train, puts it out there again.

2 So they throw enough of this stuff against
3 the wall to see what will stick.

4 Q. Mm-hmm.

5 A. So you've got Ed in two lies. Number one,
6 he cannot produce evidence that I ever tried to
7 extort him, because I didn't.

8 Number two, he told Tanya, his attorney's
9 wife, that I owe \$5,000 to Rabbi Paley.

10 Q. Mm-hmm.

11 A. So these are all lies that are meant to keep
12 me from cooperating with you guys.

13 Q. Mm-hmm.

14 Is -- on this e- -- on the email, the
15 November 23rd, 2018 email here, who -- there's a
16 JUNO3313.

17 Who's that?

18 A. JUNO is a guy named Joao. He -- it's
19 Brazilian for "John." J-o-a-o.

20 And he was -- he's not someone that I know
21 real well. I haven't talked to him in months.

22 Michael Levine is my business partner.
23 Mai Duspiared (phonetic) was the secretary for Tanya.

24 Q. Okay. I'm going to show you another
25 document.

1 Mark this as -- I think that's Exhibit N, as
2 in "November."

3 THE REPORTER: Yes.

4 THE WITNESS: Yep.

5 (Deposition Exhibit N was marked for
6 identification by the court reporter.)

7 BY MR. RILEY:

8 Q. This is an email, again, from -- this is
9 from you; correct?

10 A. This is a hack. This -- this was Manuel.

11 Q. Are you familiar with this document?

12 A. Never.

13 Q. You've never seen this document before?

14 A. I wouldn't have done this.

15 Q. And what -- so you say that this is -- what
16 do you mean when you say, this is a hack?

17 A. Manuel Chavez on this phone call to me,
18 April 2nd or April 3rd, referenced this. And this is
19 the first time I -- I've seen this. But he was
20 laughing.

21 He was saying, uh-huh, well, you know, I
22 already put it into -- into Beth's head that -- you
23 know, that you guys are -- are worthless.

24 I said, how did you do that?

25 He said, I'm all over your computer. I

1 hacked it. 'Cause if I need it -- I have
2 credentials, if I need it. So here's the evidence.

3 Q. So your understanding is this, that email
4 was actually generated by Manuel Chavez under your
5 Gmail account --

6 A. Yes.

7 Q. -- and sent to Beth.

8 A. Yes.

9 Q. Mm-hmm. Okay.

10 There was -- you referenced a period from, I
11 think, March until May, where you had relocated to
12 Texas and you were living in a hotel.

13 Is that right?

14 A. February -- February 3rd to May 13th.

15 Q. Of 2018?

16 A. '18, yeah.

17 Q. During that period of time, do you have a
18 recollection of any conversations around the period
19 of late March of 2018 --

20 Sorry. Strike that.

21 Around the period of late March of 2018, do
22 you have a recollection of any conversations about a
23 lawsuit that Aaron Rich filed against Edward
24 Butowsky?

25 A. I do.

1 Q. And what's your recollection of those
2 conversations?

3 A. The recollection is that Ed was in a real
4 bad mood, and he was scared of it.

5 And at one point, he took us to breakfast.
6 He was bitching about Schwab and bitching about
7 Aaron.

8 And -- no, he didn't take us to breakfast.

9 He met us in the lobby, and he was bitching
10 about all the stuff coming out.

11 And he said, and where's my militia. I need
12 you guys to be big-timer stuff.

13 And I told him, you can't do that the way
14 that Twitter is set up. You know, he wanted a bought
15 army.

16 I told him the way that Twitter is set up,
17 that doesn't work the Catchbox. There's Linkbox and
18 Helpbox. There's various types. And it's, you know,
19 elementary AI machine learning. They were catching
20 it by that time.

21 And I remember he said, okay, great. Manny,
22 why don't we meet later. I got some work for you.

23 And Manuel went over there.

24 And then he gave Manuel tickets to Bon Jovi,
25 like six tickets. And that was for Manuel's

1 birthday --

2 Q. Mm-hmm.

3 A. -- which would be March 21st.

4 Q. Specifically with reference to the lawsuit
5 that Aaron Rich filed against Mr. Butowsky, what --
6 did you have a recollection what Mr. --

7 Sorry. Strike that.

8 Do you have a recollection of specifically
9 what Mr. Butowsky said about the lawsuit that
10 Aaron Rich had filed against him?

11 A. Oh. He said it's complete and utter
12 bullshit. He said, I'm going to destroy him. And he
13 said --

14 Q. By "him," Aaron Rich?

15 A. Aaron Rich.

16 Q. Mm-hmm.

17 A. He said, I'm going to destroy him.

18 And then he brought a knife to a gunfight;
19 right? And there was a lot bravadero [sic], and all
20 that.

21 And then he said, oh, that creepy kid. He's
22 the one who was smiling after his brother died.

23 So I went on camera in a reference to some
24 sort of --

25 (Reporter clarification.)

1 THE WITNESS: He said, that creepy kid, he
2 was the one who was smiling while his parents were
3 grief stricken.

4 BY MR. RILEY:

5 Q. Is that all he said about the lawsuit?

6 A. That's all I remember.

7 MR. RILEY: Can we take a five-minute break?

8 THE WITNESS: Sure.

9 THE VIDEOGRAPHER: We are going off the
10 record at 4:41 p.m.

11 (Short recess.)

12 MR. RILEY: Ready.

13 THE VIDEOGRAPHER: We are back on the record
14 at 4:53 p.m.

15 BY MR. RILEY:

16 Q. Mr. Schoenberger, you understand you're
17 still under oath?

18 A. Yes.

19 Q. And we did not talk about your testimony
20 during any of the breaks today; correct?

21 A. Correct.

22 Q. Okay. I just want to go back and summarize
23 some of your testimony, make sure I'm understanding
24 it correctly.

25 Am I correct that you started a company

1 called Shadowbox around July of 2017?

2 A. Yes.

3 Q. And around that time, Trevor Fitzgibbons
4 connected you with Ed Butowsky; correct?

5 A. Yes.

6 Q. And in the summer of 2017, you had a Zoom
7 meeting with Mr. Butowsky; correct?

8 A. Yes.

9 Q. And during the course of that Zoom meeting,
10 Shadowbox pitched Mr. Butowsky for work that
11 Shadowbox could do for Mr. Butowsky --

12 A. Yes.

13 Q. -- correct?

14 A. (No audible response.)

15 Q. Correct?

16 A. Yes.

17 Q. And Mr. Butowsky said, during that meeting,
18 that he was looking for support to fight back against
19 people who had accused him of exploiting Seth Rich's
20 murder for personal gain; correct?

21 A. Mm-hmm.

22 Q. Is that correct?

23 A. Yes.

24 Q. And Mr. Butowsky hired Shadowbox for
25 \$20,000 --

1 A. Mm-hmm.

2 Q. -- correct?

3 A. (No audible response.)

4 Q. Correct?

5 A. Yes.

6 Q. And Mr. Butowsky said, during the course of
7 your engagement with him, that record Wheeler had
8 proven unreliable in, quote-unquote, investigating
9 Seth Rich's murder --

10 A. Yes.

11 Q. -- correct?

12 Correct?

13 A. Yes.

14 Q. And Mr. Butowsky said that in light of his
15 loss of confidence in Mr. Wheeler, that Mr. Butowsky
16 needed a militia to pursue allegations that Seth Rich
17 had hacked the DNC; right?

18 A. Yes.

19 Q. Right.

20 And in August of 2017, Mr. Butowsky
21 connected you with Matt Couch; correct?

22 A. Yes.

23 Q. And at that point in August of 2017,
24 Mr. Butowsky and Mr. Couch had already developed a
25 relationship with one another; correct?

1 A. Yes. And we -- just to be forensic, it was
2 Trevor Fitzgibbon at the request of Ed, who urged us
3 to follow Matt Couch on Twitter and then to contact
4 him.

5 Q. Okay. So Mr. Butowsky instructed
6 Mr. Fitzgibbons to have Shadowbox connect with
7 Mr. Couch.

8 A. Yes.

9 Q. Okay. And Mr. Butowsky and Mr. Couch, as of
10 at least August of 2017, had a relationship with each
11 other; correct?

12 A. Yes.

13 Q. And Mr. Butowsky had promised Matt Couch
14 money in exchange for Matt Couch speaking publicly
15 about Seth Rich's murder; correct?

16 A. Yes.

17 Q. And Mr. Butowsky was interested in having a
18 relationship with Matt Couch, because Matt Couch was
19 perceived to be a social media influencer; correct?

20 A. Yes.

21 Q. And Mr. Butowsky was drawn to Matt Couch,
22 because Matt Couch had many followers on social
23 media; correct?

24 A. Yes.

25 Q. And Mr. Butowsky looked to Matt Couch to

1 fill the void that record Wheeler had left when
2 Mr. Butowsky lost confidence in Mr. Wheeler's ability
3 to pursue allegations against Seth Rich; correct?

4 A. Correct.

5 Q. And Matt Couch was -- at the time had
6 reported to you that he was in a very difficult
7 financial situation; correct?

8 A. Yes.

9 Q. And so Matt Couch agreed to accept money
10 from Mr. Butowsky to amplify Mr. Butowsky's
11 allegations against Seth Rich; correct?

12 A. He agreed to be the lead investigator for
13 Ed Butowsky. And -- and, yes, to amplify Ed's
14 message.

15 Q. Okay. So Mr. Couch agreed to accept money
16 from Mr. Butowsky to speak -- to speak on social
17 media about the allegations against Seth Rich.

18 A. Yes.

19 Q. Okay. And so it was your understanding,
20 based on your own personal observations and direct
21 knowledge, that Mr. Couch and Mr. Butowsky had an
22 agreement to spread messages on social media,
23 alleging that Seth Rich and Aaron Rich had hacked the
24 DNC emails.

25 A. Yes. And he -- and it was also to find out

1 who murdered Seth Rich.

2 Q. Right.

3 And Mr. Butowsky convened a meeting at his
4 home in Texas on September 20th of 2017; correct?

5 A. Yes.

6 Q. And you attended that meeting --

7 A. Yes.

8 Q. -- correct?

9 And Matt Couch attended that meeting.

10 A. Yes.

11 Q. And Joe -- Josh Flipppo attended that
12 meeting.

13 A. Yes.

14 Q. And Melia Zimmerman attended that meeting.

15 A. Yes.

16 Q. As did Joe Berkell?

17 A. Yes.

18 Q. And Dave Strossel [sic]?

19 A. Yes.

20 Q. And remind me who Dave Strossel was?

21 A. Dave Stossel -- Dave was an associate of
22 Joe Berkell.

23 Q. Okay. And Trevor Fitzgibbon attended?

24 A. Yes.

25 Q. Manuel Chavez attended?

1 A. Yes.

2 Q. And Beth --

3 A. Blackburn --

4 Q. -- Blackburn attended.

5 A. Yes.

6 Q. Okay. And during that meeting, Mr. Butowsky
7 expressed displeasure with the Russian collusion
8 narrative.

9 A. Yes.

10 Q. And by the Russian collusion narrative, what
11 he meant was public allegations or suspicion that the
12 Trump campaign had colluded with Russia to hack the
13 DNC emails.

14 A. Yes.

15 Q. And Mr. Butowsky was unhappy about --
16 Mr. Butowsky was unhappy about the Russian collusion
17 narrative because he said that it delegitimized the
18 president; right?

19 A. Yes.

20 Q. And during the meeting on September 20th,
21 2017, Mr. Butowsky expressed a desire to amplify and
22 promote allegations that, instead, Seth Rich and his
23 brother Aaron Rich were responsible for hacking the
24 DNC emails; correct?

25 A. Yes.

1 Q. Yes?

2 A. Yes.

3 Q. And during the meeting on September 20th,
4 2017, Mr. Butowsky told you that he had an
5 arrangement with Admiral Lyons; correct?

6 A. Yes.

7 Q. And the arrangement that Mr. Butowsky
8 described with Admiral Lyons was one in which
9 Mr. Butowsky ghostwrote articles for Admiral Lyons;
10 correct?

11 A. That's correct.

12 Q. And Mr. Butowsky showed you an example of an
13 article that he had ghostwritten for Admiral Lyons;
14 correct?

15 A. That's correct.

16 Q. And that article involved issues dealing
17 with Israel, to the best of your recollection;
18 correct?

19 A. Israel and America and patriotism, yes.

20 Q. Right.

21 And during the meeting of September 20th of
22 2017, Melia Zimmerman spoke about the fact that she
23 had been suspended with pay from Fox News; correct?

24 A. Yes.

25 Q. And Melia Zimmerman said that she had been

1 suspended with pay from Fox News because she had
2 published an article that subsequently was retracted;
3 correct?

4 A. Yes.

5 Q. And the article that was subsequently
6 retracted made allegations that Seth Rich was
7 involved in hacking the DNC --

8 A. Yes.

9 Q. -- emails.

10 And during the course of the September --
11 during the course of the September 20th, 2017
12 meeting, Mr. Butowsky, Mr. Couch and Mr. Chavez
13 reached an agreement to conduct a surveillance
14 operation targeting Joel and Mary Rich in Nebraska;
15 correct?

16 A. I did not see Matt Couch say anything. But
17 I certainly observed back and forth between
18 Manuel Chavez and Ed Butowsky, to go forward with a
19 surveillance operation that included wiretapping and
20 a listening post, to listen to every conversation
21 within that household. Yes.

22 Q. And Mr. Butowsky -- to be clear,
23 Mr. Butowsky requested that Manuel Chavez conduct a
24 surveillance operation against Joel and Mary Rich in
25 Nebraska; correct?

1 A. Yes.

2 Q. And Mr. Butowsky asked Manuel Chavez to
3 outfit what he called a spy van to conduct that
4 operation; correct?

5 A. Yes. And he used the term "StingRay."

6 Q. And what it -- what was a StingRay reference
7 to?

8 A. StingRay is a device that the FBI use that
9 can capture all communications, emails and the whole
10 nine yards.

11 Q. And Mr. Butowsky asked Mr. Chavez to deploy
12 a StingRay against the Rich family in Nebraska;
13 correct?

14 A. That was only part of it.

15 They wanted it to the point where they can
16 listen to every room and hear discussions.

17 So StingRay will only capture electronic
18 communications. They literally wanted ears in every
19 room.

20 Q. And -- and Mr. Butowsky also asked
21 Mr. Chavez to conduct a surveillance operation
22 against Aaron Rich.

23 A. Yes.

24 Q. Was there -- do you have any recollection as
25 to -- was there any discussion as to where Aaron Rich

1 was located at that time?

2 A. The discussion was he worked for
3 Northrop Grumman. I don't remember a location. But
4 they said --

5 Ed Butowsky said, I can get you his bank
6 account.

7 Turning to Manuel Chavez, he said, can you
8 get in there?

9 He said, we'll find a way.

10 Q. Uh-huh.

11 At no point in the -- your entire -- the
12 history of your entire relationship with
13 Mr. Butowsky, at any point, has he ever provided any
14 actual evidence supporting his allegation that
15 Aaron Rich and Seth Rich were involved in hacking the
16 DNC emails?

17 A. He has no supporting evidence. And I've
18 asked him three times.

19 Q. I want to ask you about -- we've had a bit
20 of a discussion today about some documents that you
21 may or -- or may not have in connection with your
22 testimony today.

23 You okay?

24 A. Yeah. Sorry.

25 Q. That's okay.

1 Do you want to take a break?

2 A. No.

3 Q. Okay.

4 A. We're good.

5 Q. You -- you had, previous to today, collected
6 and -- and transmitted to my cocounsel and to my law
7 firm, some documents; is that correct?

8 A. Yeah. Many.

9 Q. And you did that voluntarily --

10 A. Yes.

11 Q. -- correct? Yeah.

12 If you were asked to search for additional
13 relevant documents, how would you go about conducting
14 that search?

15 A. I -- I could do a forensic search on my
16 computer. I know there's nothing on the current
17 computer. It's a possibility that I -- and a strong
18 possibility that I transferred to another computer
19 13 minutes and 52 seconds, a -- a voice recording.

20 As you can see, I've got evidence of
21 rerecording my landlord, because she was getting
22 physically violent with me, which led to me taking a
23 temporary restraining order out on her.

24 That shows that I record when I feel that
25 there's trouble --

1 Q. Mm-hmm.

2 A. -- which I do. It's not a usual thing I
3 take in any business meetings. But I definitely felt
4 it was important with that meeting with Ed. I turned
5 on the recorder.

6 I'd originally brought the recorder so we
7 could share creative ideas.

8 Q. Yeah.

9 A. And it became apparent to me that -- that --
10 that things were not what they seemed.

11 Q. Yeah.

12 And -- and the -- the moment when you
13 triggered the recording at the meeting on
14 September 20th was in connection with Mr. Butowsky
15 referencing potential acts of violence against
16 Chris Cuomo?

17 A. Yeah. He said, can someone put a hit out on
18 Chris Cuomo?

19 And I think Manuel Chavez laughed.

20 And I looked over at Beth, and she seemed to
21 not notice.

22 So I went like this (indicating), went in
23 there, clicked it. Felt it to see if it was running.
24 It didn't feel like it was running. Pulled it out,
25 it was running.

1 And then 40 seconds later -- 40 to 45
2 seconds later, he started in. And the first thing
3 was, okay, guys, here's what we're going to do.

4 He said, I need you guys to go and get into
5 Omaha, Nebraska. I want you casing Joel Rich. I
6 want a van outfitted with the latest surveillance
7 tech- -- technology.

8 Manny, do you know how to get into every one
9 of their computers? Can you hack their phones?
10 Right?

11 And Manuel Chavez, says I'm down with that,
12 man. You know, you're going to pay us; right?

13 And he basically said, of course. You're
14 going to be taken care of.

15 And that is where my voice comes in there.
16 And I say, I'm not going to break law. And you
17 should know better. I'm a privacy freak.

18 And at the very end, I said, I'm cicada,
19 which has to do with Cicada 3301.

20 Then there was a whole bunch of interference
21 in the tape.

22 And at the very end, it's Matt Couch's voice
23 saying, well, I don't know, this could get us in hot
24 water.

25 Let me go check. It was shhhhh; right?

1 Which -- it sounded like "I." But I'm pretty sure it
2 was "Ty."

3 Q. When Mr. Butowsky referenced a potential hit
4 on Chris Cuomo, do -- was it understood that that --
5 he -- did -- did you take him seriously? Or was that
6 a joke?

7 A. He looked like this (indicating), and he
8 looked hard.

9 And so at first, I was shocked. And then
10 when he laughed, he laughed like a maniac. And he
11 had said a couple other off things earlier in the
12 day.

13 But when he started talking about that, he
14 had said earlier, I want you guys to be my militia,
15 and I want you guys to do the ops that I can't do
16 because I have a reputation to -- to uphold.

17 So, you know, I was feeling uneasy and
18 uncomfortable with it.

19 Q. What did he say -- did he give you any
20 background as to what his issue was with Chris Cuomo?

21 A. Yes. He said that he had done an interview
22 on CNN, and that Chris had blindsided him; and that
23 it was a prepared hit. And that Ed was the nicest
24 guy in the world, and he just wanted to come up and
25 tell his truth.

1 And then he said Cuomo was a trained
2 rhetorician.

3 I probably said that word.

4 But trained it to be through Yale, I guess.

5 Q. Mm-hmm.

6 A. One of the Ivy Leagues.

7 Q. Mm-hmm.

8 Just going back for a second to the -- to
9 Matt Couch's arrangement with Ed Butowsky, you had
10 referenced a conversa- -- you had referenced a
11 conversation where Matt Couch said that he was
12 waiting for money from Mr. Butowsky?

13 A. He was complaining.

14 Q. That he hadn't received the money yet?

15 A. Yeah. He was saying, I hope I'm not being
16 played.

17 Q. Uh-huh.

18 And was that a reference to an explicit
19 agreement that Mr. Couch and Mr. Butowsky had entered
20 into previously?

21 A. Mr. Couch had said, Ed promised me.

22 Q. What'd he say exactly?

23 A. He said, Ed promised me money. I hope he's
24 not trying to weasel out.

25 Q. Uh-huh.

1 Did he say what Mr. Butowsky had promised
2 him money for?

3 A. Seth Rich. But, you know -- I didn't want
4 to discuss Seth. And I --

5 We were waiting for our money at that point.

6 Q. Mm-hmm.

7 A. And so I said, I don't know what to say,
8 let's see what happens. There is a normal course, 30
9 days.

10 And so three, four days later, money did
11 come in.

12 And I called Matt, and I said, ours came in;
13 yours will, too.

14 Q. Did you subsequently have conversations with
15 Mr. Couch about financial transactions as between
16 Mr. Couch and Mr. Butowsky?

17 A. Never again.

18 Q. Mm-hmm.

19 With respect to your own personal
20 background, for the record, you -- can you describe
21 your educational background?

22 A. I had a father who was a psychiatrist, who
23 beat me every day in my life.

24 Q. I'm sorry.

25 A. It's okay.

1 I left home early. I educated myself under
2 pseudo names.

3 Q. Mm-hmm.

4 A. I was at Cal Berkeley, and I was at UCLA. I
5 started plasma physics. I studied history. You
6 know -- so I'm an autodidactic.

7 Q. And did you at any of those institutions
8 complete a formal degree program?

9 A. Yeah.

10 Q. And which -- which one was that?

11 A. Master's at -- at Berkeley.

12 Q. Berkeley?

13 And then after you obtained your master's
14 from Berkeley, did you go into the work force?

15 A. I did it under an assumed name. But, yeah,
16 I -- I worked for Dr. Fredrick Scarf, plasma physics.

17 Q. Mm-hmm.

18 A. I became a vice president of a messenger
19 service. I did historical work.

20 I composed music under assumed names that
21 would sell my music to people --

22 Q. Mm-hmm.

23 A. -- you know. It's...

24 Q. Gotcha.

25 And -- and I think you mentioned before,

1 before Shadowbox, what was your -- what -- what --
2 what was your occupation immediately before
3 Shadowbox?

4 A. I started something called North Bay
5 Entertainment, which became the largest music agency
6 north of the gate. Very successful.

7 I had Intellibaby, which was the selling of
8 my CDs. I created polyphonic music geared towards
9 infants, too.

10 I started to teach people different
11 languages, ancient languages, various --

12 (Speaking a foreign language.)

13 I speak a bunch of languages.

14 Yep. How to explain it, you know.

15 Q. Yeah. Yeah.

16 A. Yeah.

17 Q. I think I get the -- I get the picture.

18 A. Yeah.

19 MR. RILEY: Let's go off the record for one
20 minute.

21 I think we just have one more round of
22 questions, and then we'll be done.

23 THE VIDEOGRAPHER: Okay. We are going off
24 the record at 5:14 p.m.

25 (Short recess.)

1 THE VIDEOGRAPHER: Ready when you are,
2 Counsel?

3 MS. HOUDRE: We're ready.

4 THE VIDEOGRAPHER: Okay. We are back on the
5 record at 5:18 p.m.

6

7

EXAMINATION

8 BY MS. HOUDRE:

9 Q. Mr. Schoenberger, you know that you're still
10 under oath?

11 A. Yes.

12 Q. And we did not discuss the substance of your
13 testimony during our short break?

14 A. Correct.

15 Q. You said to Mr. Riley earlier that
16 Mr. Butowsky asked you to set up Stuart Blaugrund.

17 A. Yes.

18 Q. Is that correct?

19 A. Yes.

20 Q. Could you please take a look at what's
21 labeled Exhibit L.

22 A. Yeah.

23 Q. At the very bottom, Mr. Riley went through
24 this with you earlier, the email dated June 1, 2018,
25 sent by TStGermain.

1 That's you?

2 A. That's me.

3 Q. The second paragraph says -- I'll start from
4 the beginning.

5 "Ed was meeting with Manny and I. He would
6 tell us we are his private militia. Then he would
7 call me and lie. Then he asked me to set up Stuart
8 Blaugrund on child porn, because Stu had upset his
9 wife."

10 He -- in that sentence, "Then he asked me to
11 set up Stuart Blaugrund on child porn," is referring
12 to Mr. Butowsky?

13 A. Yes.

14 Q. And Stuart Blaugund [sic] is Stuart
15 Blaugrund --

16 A. Yes.

17 Q. -- correct?

18 A. Just a typo.

19 Q. Okay. And in what context did Mr. Butowsky
20 ask you to set Mr. Blaugrund up?

21 A. He hated Stuart Blaugrund. He'd actually
22 made an MP4 for us, where he had suggested putting
23 out Stuart Blaugrund's private information on his
24 Facebook and out into the ether, so anybody could
25 take a look at who he was and then attack him.

1 So I have that MP4, and I've turned it over
2 to counsel.

3 They had been friends at one point. They
4 used to go to dinner together. They became mortal
5 enemies. And Ed was upset because Stuart outed him
6 for the creep he is.

7 And so Stuart was in touch with Doug Wigdor
8 and probably with David Fokenflick and others.

9 And so Ed wanted him taken down. He not
10 only suggested child porn, he said maybe rape. He
11 wanted me to assume the identity of a anonymous
12 female online.

13 Q. Okay.

14 A. Yeah.

15 Q. So let's -- before we get into the specific
16 allegation, let's -- let's come back to a few things
17 you said.

18 You said Mr. Butowsky hated Mr. Blaugrund.

19 Why is that? Or why is that your
20 understanding?

21 A. Ed said it. And Ed said they had some sort
22 of falling out. He would not give me the details.
23 But it sounded visceral. And then when this came
24 around, this was -- he asked me on May 13th, 2018 --

25 Q. When you refer to "this," what are you

1 referring to?

2 A. To the request or the demand of me that I go
3 ahead and make a false allegation against Stuart
4 Blaugrund online in order to destroy him.

5 Q. So if I understand you correctly, you're
6 saying that Mr. Butowsky and Mr. Blaugrund had a
7 falling out.

8 A. Yes.

9 Q. Do you know when that was?

10 A. Prior to us meeting him.

11 Q. Prior to you meeting whom?

12 A. Ed Butowsky.

13 Q. On September 20th, 2017?

14 A. Yes. Prior to any communication I've ever
15 had with Ed Butowsky, which began July -- late July,
16 2017.

17 Q. And you said that Mr. Butowsky wanted to,
18 quote, "destroy Mr. Blaugrund," including because of
19 communications he had with Wigdor LLP, the law firm?

20 A. Yes.

21 Q. What do you mean by that?

22 A. He made an MP4 for us, which counsel has.
23 And in it, he references emails that he has, which
24 include emails to Wigdor and others. I don't know
25 how he got them.

1 But I've given the MP4 to Michael Gottlieb
2 and to Hall, as well.

3 And then if I can tell you, this is
4 June 1st, 2018. This is the day before I leave
5 Mexico where I have very shoddy communications.

6 I was suffering from pneumonia at the time.
7 I started to feel better on June 5th, 2018, when I
8 contacted Stuart Blaugrund to tell him what was going
9 on. So that would've been, roughly, three weeks
10 after Ed Butowsky requested this from me.

11 So it was three weeks spent in a third world
12 country with, you know, bad communication
13 capabilities.

14 Q. Okay. So you -- you referenced that Ed --
15 Ed Butowsky wasn't happy with Stuart Blaugrund
16 because of emails that Mr. Blaugrund sent to Wigdor
17 LLP; correct?

18 A. Yes. And there's more.

19 He also said at that point -- on May 13th,
20 he drove up in an SUV.

21 Q. Who -- who was "he"?

22 A. Ed Butowsky.

23 Sorry. These people.

24 (Telephone interruption.)

25 THE WITNESS: Yeah. Ed Butowsky drove to

1 the Marriott Hotel, where I was staying, and I
2 believe that was in Dallas.

3 Early in the morning, he texted me saying,
4 come downstairs.

5 He was in a black Suburban and pulled up at
6 the lobby, and he had a hard look in his eyes.

7 And he says, this time you're not going to
8 disappoint me.

9 And I said, excuse me?

10 I could barely speak. I had pneumonia.

11 And he said, here's what you're going to do.

12 And he said, you're going to go ahead and you're
13 going to assume the identity of a young female.

14 You're going to go ahead, and you're gonna make it
15 look like it's -- like he's a child molester or has
16 child porn or he's a rapist.

17 And I said -- I -- I shook my head, and I
18 said, no.

19 And he got very frustrated with me.

20 And he -- he said, then you're getting the
21 fuck out of the hotel within the next hour.

22 And I said, I'm a pretty sick man.

23 And he said, I don't give a fuck,
24 quote-unquote.

25 And that was that. He called the hotel, and

1 he put the pressure on it, and -- and I left.

2 Q. So looking -- looking back to the --
3 Exhibit L, the -- the same email in the last couple
4 of lines, say:

5 "I swear to you he would come by the hotel,
6 call me, wait for me to come out to his car, tell me
7 what he wanted, demand it. I kept refusing. I
8 refused to do anything legal."

9 Is what you just summarized the same
10 incident that is reflected in this --

11 A. Yes.

12 Q. -- in these sentences I just read?

13 A. Yeah.

14 Q. So all of this is one insurance- --
15 instance --

16 A. Yeah.

17 Q. -- one instance where he asked you to set
18 Stuart up?

19 A. Yeah.

20 Can I make one more statement?

21 Q. Sure.

22 A. At the same time this was going on,
23 Manuel Chavez --

24 And this was my birthday, by the way.

25 -- Manuel Chavez was at my home,

1 livestreaming to everybody, threatening me, saying,
2 you better shut up, you better shut up. You better
3 not say anything.

4 He's scared of me going to the authorities.

5 He put all sorts of horrible things over the
6 Internet about myself.

7 Did the same thing to Beth at the same time.
8 He was doxing her, exposing her, all the -- all the
9 threats he said. He said he was going to destroy my
10 relationship with her. He said he was going to
11 destroy my relationship with my son. He said he was
12 going to leave me homeless. And then he said I was
13 going to be killed.

14 So I said -- and -- and he called me with
15 this, as well.

16 And I said, who's going to kill you?

17 And he said, Ed knows everybody. You don't
18 think he's got the connections? If he doesn't, I do.

19 So these were -- and I went to the police.
20 I've got police reports.

21 I have a police report from Beth, as well.
22 I have a police report from Michael Levine.

23 Q. Returning back to -- before we get into --
24 I -- I do want to get into what Mr. Butowsky
25 specifically asked you to do, before we get to that.

1 So you said that Mr. Butowsky was unpleased
2 with Mr. Wheeler because of emails -- I'm sorry --
3 with Mr. Blaugrund because of emails Mr. Blaugrund
4 sent to Wigdor LLP; correct?

5 A. Yes.

6 Q. Was this in relation to Mr. Wheeler's
7 lawsuit against Mr. Butowsky?

8 A. Yes.

9 Q. Et al.?

10 A. Yeah.

11 Q. Do you know -- do you know the content of
12 those emails?

13 A. They were right there in the MP4 --

14 Q. Okay.

15 A. -- that Mr. Butowsky sent.

16 Q. Okay. Do you know if another motivation of
17 Mr. Butowsky is for why he asked you to set up
18 Mr. Blaugrund, was because Mr. Blaugrund had upset
19 Mr. Butowsky's wife?

20 A. Yeah. I didn't get into the details of it,
21 but he -- that was it.

22 The problem that I had with Ed Butowsky is
23 that I believe he's a congenital liar, and he will
24 make things up on the spot.

25 There's no consistency with anything that he

1 does other than choosing a victim and stalking them.

2 Q. And I'd like to get into what exactly
3 Mr. Butowsky asked you to do.

4 So when he came to your -- he came -- you
5 were in your hotel in Dallas, Texas. Mr. Butowsky
6 drove over.

7 And how exactly did he ask you to set up
8 Mr. Blaugrund? How did he initiate that --

9 A. He --

10 Q. -- request?

11 A. He texts me. And he says -- it's around
12 7 a.m.

13 He says, come on downstairs.

14 So I said, give me a couple minutes.

15 I came downstairs. He's in a black
16 Suburban, white shirt, and looking harsh.

17 And he -- and -- and he says, don't
18 disappoint me, or something along those lines.

19 Q. Mm-hmm.

20 A. And he said, this is what I need you to do.

21 And he described how -- he said, whatever
22 you think is going to have maximum impact. He said,
23 whether --

24 (Reporter clarification.)

25 THE WITNESS: Whatever you think will have

1 maximum impact. He said, I don't care if you pose
2 him as a rapist or as someone who's got child porn on
3 his computer, or a child molester.

4 He said, you can do it anonymously.

5 And he said, but I want him to feel the
6 pain.

7 And so my response to it was, I told you
8 before, I don't do this.

9 And that's where he said, then get the fuck
10 out.

11 And he said, you've got an hour.

12 Q. Okay. I'm going to show you another
13 exhibit.

14 What letter are we on?

15 THE REPORTER: O.

16 MS. HOUDRE: O.

17 (Deposition Exhibit O was marked for
18 identification by the court reporter.)

19 BY MS. HOUDRE:

20 Q. This is Exhibit -- this is Exhibit O.

21 Is this an email?

22 A. (No audible response.)

23 Q. Please take a few minutes to -- to look it
24 over.

25 A. It's not an email. It is the -- it's a

1 description for a YouTube video.

2 Q. And the YouTube video was uploaded
3 June 22nd, 2019?

4 A. Sounds right.

5 Q. And who is Parody Lives?

6 A. Me.

7 Q. That's you?

8 A. Yeah.

9 Q. And does this description accurately
10 reflect --

11 A. Yeah.

12 Q. -- the contents as you recall them?

13 A. Hundred percent.

14 Q. Okay. Looking at the second line, it says:

15 "Ed Butowsky scheming to attack Dallas
16 attorney, Stuart Blaugrund. This Zoom conference was
17 with Defango, myself, Trevor and one other person.
18 Ed wanted to ruin Stuart's life. Defango was very
19 eager to create ways to destroy Stuart, provided Ed
20 paid him well."

21 A. Mm-hmm.

22 Q. Is this referring to what you just told us
23 about Mr. Butowsky, asking you to set up
24 Mr. Blaugrund?

25 A. Oh, no. This is a whole different thing.

1 This is a month and a half prior. This is
2 in March where Ed met us for breakfast. And he spoke
3 directly to Manuel Chavez. And he was going off on
4 Stuart.

5 He was saying, I want you to just annihilate
6 the guy, too.

7 So when he came to me a month and a half
8 later, right, we're -- we're going from the Ides of
9 March to May 13th.

10 Manuel -- you know, Defango had already left
11 Texas on April 1st or 2nd. I think the 2nd. And
12 with that, he had gone through going into hospitals
13 at times, admittedly being on prescription drugs.

14 Q. What do you mean? Mr. Chavez had -- went to
15 the hospital with Mr. Butowsky?

16 A. Well, no. Mr. Chavez left Texas to go back
17 to Arizona. I think he was in California for a short
18 amount of time.

19 But what had happened is, Ed would get into
20 these moods. We would see him and he'd be in a very
21 bad mood or very good mood.

22 For this particular meeting -- and it
23 would've been March 18th, 19th or 20th -- he was in a
24 very bad mood.

25 And he basically said, I want action on

1 this.

2 And this is where Manny said, oh, we could
3 do all sorts of things.

4 Q. And so this was a Zoom meeting; correct?

5 A. No. This was a --

6 Q. No.

7 A. -- in-person meeting.

8 Q. This is an in-person meeting.

9 A. Yeah.

10 Q. What is the "Zoom conference" in the third
11 line referring to?

12 A. Zoom conference was where I had a -- where
13 we had a Zoom conference, and Ed Butowsky gave a MP4,
14 which is -- in this thing.

15 Q. Okay.

16 A. Yeah.

17 Q. And at the in-person meeting in
18 approximately March --

19 A. Middle March, yeah.

20 Q. -- mid-March 2018, what did Mr. Butowsky
21 mean when he asked you and Mr. Chavez to annihilate
22 Mr. Blaugrund?

23 A. He wanted to annihilate the reputation.
24 He -- it -- Stuart Blaugrund had a practice.

25 Q. Mm-hmm.

1 A. And Ed explained he thought that Stuart was
2 ruining his -- his business. He wanted Stuart's book
3 of business destroyed.

4 Q. At this meeting, Mr. Butowsky -- at this
5 meeting, did Mr. Butowsky ask you to set
6 Mr. Blaugrund up for rape or --

7 A. No. He was --

8 Q. -- child porn?

9 A. -- waiting for suggestions.

10 And I shut him down for the 60th time --

11 Q. Okay.

12 A. -- and I said, I don't do this.

13 And once again, Manuel Chavez said, let's go
14 talk privately.

15 Which they did. Manuel Chavez then went
16 over to his house.

17 Q. Okay. So just -- just to summarize, the
18 May 13th -- May 13th was the -- was the first time
19 Mr. Butowsky asked you to set up Mr. Blaugrund?

20 A. No.

21 March was probably the second time when he
22 met with Manuel Chavez and I. That's two months
23 before May 13th.

24 And then even prior to that, he brought it
25 up with -- in a Zoom with Beth and I and Manuel.

1 And that is what I have a video of that's
2 unlisted.

3 And so --

4 Q. Maybe I misunderstood you. I thought you
5 said that the March meeting did not discuss --

6 A. No. The -- the March did.

7 Q. And so the May 13th meeting was another --

8 A. May 13th was a meeting with just --

9 Q. With you?

10 A. Yes. When he came to the hotel --

11 Q. Okay.

12 A. -- and I had no voice. And he literally was
13 demanding --

14 Q. Okay.

15 A. -- and then threw me out of the hotel within
16 an hour when I said no.

17 But he had discussed -- he had a meeting, I
18 think it was for coffee, with Manuel and I.

19 Q. Okay.

20 A. And he had said, I want you to annihilate.

21 And that's where Manuel had basically said,
22 we'll work this out on our own.

23 And later on that day, he went to his place.

24 So that would've been around May 15th or
25 May 16.

1 Q. And did you ever follow through on
2 Mr. Butowsky's request that you set up Mr. Blaugrund
3 for child porn or rape --

4 A. No.

5 Q. -- or any other crime?

6 A. No.

7 Q. Do you know --

8 A. I followed through on contacting Stuart
9 Blaugrund as soon as I got back to the country.

10 Q. Do you know if Mr. Chavez ever followed
11 through on Mr. Butowsky's request to accept- --
12 falsely accuse Mr. Blaugrund of rape or setting him
13 up on child porn or another crime?

14 A. Four days ago, Manuel Chavez publicly said,
15 oh, wow, Stuart Blaugrund has a record.

16 So he said that. He's got 20,000 followers
17 on YouTube. So that was done four days ago.

18 I could find -- I could find it, if you guys
19 want it.

20 Q. Okay. And a final couple of questions for
21 you.

22 A. Thank you.

23 You guys are great.

24 Q. Are you familiar with the term "QAnon"?

25 A. Yeah.

1 Q. And what's your understanding of QAnon?

2 A. QAnon is a Trump-centric conspiracy where it
3 is probable, in my mind, that 30 to 40 million
4 Americans were psy-oped into being cheerleaders for
5 war with Iran.

6 QAnon is a huge movement. They stole Tropes
7 from Cicada -- us, and Manuel Chavez has falsely
8 stated that he created QAnon. And then, when things
9 got crazy, he pointed at me and said I created it.

10 I did not.

11 Q. Okay.

12 We don't have any further questions.

13 A. We're good?

14 Okay. So --

15 Q. Thank you.

16 A. You're welcome.

17 I'm sure you want to get P to Z at some
18 point. So we're going to do this again; right?

19 MR. RILEY: Well, sorry. What are you --
20 we're --

21 THE WITNESS: We're on Exhibit P.

22 MR. RILEY: Oh. No. There's no further --
23 don't -- we have no further questions now.

24 And those are the exhibits we have for you.

25 We can go off -- off the record.

1 THE WITNESS: Can we go off the record?

2 THE VIDEOGRAPHER: Stipulation?

3 MR. RILEY: Yeah. We'll read it.

4 THE VIDEOGRAPHER: Okay. Copy --

5 We are going off the record at 5:40, and
6 that ends today's deposition.

7 THE REPORTER: So we have Exhibits A
8 through O.

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DECLARATION UNDER PENALTY OF PERJURY

I, THOMAS ANDREW SCHOENBERGER, do hereby
certify under penalty of perjury that I have read the
foregoing transcript of my deposition taken on
June 27, 2019; that I have made such corrections as
appear noted herein in ink, initialed by me; that my
testimony as contained herein, as corrected, is true
and correct.

DATED this ____ day of _____, 20____,
at _____, California.

THOMAS ANDREW SCHOENBERGER

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REPORTER'S CERTIFICATION

I, Marceline F. Noble, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn; that the deposition was then taken before me at the time and place herein set forth; that the testimony and proceedings were reported stenographically by me and later transcribed into typewriting under my direction; that the foregoing is a true record of the testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this 9th day of July, 2019.

Marceline F. Noble, CSR No. 3024

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