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DISTRICT COURT SEVENTH JUDICIAL DISTRICT  
BONNEVILLE COUNTY IDAHO

CHAD CHRISTENSEN,

Plaintiff/Counterdefendant,

vs.

GREGORY GRAF,

Defendant/Counterclaimant/Third-  
Party Plaintiff,

vs.

GREG PRUETT, an individual; DUSTIN  
HURST, an individual; and EMMALEE  
ROBINSON, an individual,

Third-Party Defendants.

Case No.: CV10-21-1197

DECLARATION OF JARED W. ALLEN

I, Jared W. Allen, having first been duly sworn, hereby declare and state:

1. I am over the age of eighteen, am competent to testify, and do so from personal knowledge.
2. I am an attorney at Beard St. Clair Gaffney PA, counsel of record for the Defendant, Gregory Graf (“Graf”).
3. Attached as Exhibit A is a true copy of the deposition of EmmaLee Robinson, dated April 13, 2021, including specified exhibits thereto.

4. Attached as Exhibit B is a true copy of the deposition of Chad Christensen, dated August 1, 2023, including specified exhibits thereto.

5. Attached as Exhibit C is a true copy of the deposition of Greg Pruett, dated August 1, 2023, including specified exhibits thereto.

6. Attached as Exhibit D is a true copy of the deposition of Dustin Hurst, dated August 2, 2023, including specified exhibits thereto.

I certify subject to the penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

Dated: August 30, 2023.

/s/ Jared W. Allen

Jared W. Allen

Beard St. Clair Gaffney PA

Attorney for Gregory Graf

## CERTIFICATE OF SERVICE

I certify I am a licensed attorney in the state of Idaho, I have my office in Idaho Falls, Idaho, and on August 30, 2023, I filed the foregoing *DECLARATION OF JARED W. ALLEN* using the iCOURT system and caused the same to be served upon the following by electronic means:

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/s/ Jared W. Allen  
Jared W. Allen  
Beard St. Clair Gaffney PA  
Attorney for Gregory Graf

**In The Matter Of:**  
*CHRISTENSEN vs.*  
*GRAF*

---

*EMMALEE ROBINSON*  
*April 13, 2021*

---

*T&T Reporting, LLC*  
*477 Shoup Avenue, Suite 105*  
*Idaho Falls, Idaho 83402*

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1 DISTRICT COURT SEVENTH JUDICIAL DISTRICT  
2 BONNEVILLE COUNTY IDAHO  
3  
4 CHAD CHRISTENSEN, )  
5 Plaintiff, ) Case No.  
6 vs. ) CV10-21-1197  
7 )  
8 GREGORY GRAF, )  
9 Defendant. )

10 DEPOSITION OF EMMALEE ROBINSON  
11 Tuesday, April 13, 2021, 9:00 a.m.  
12 Idaho Falls, Idaho

13  
14  
15 BE IT REMEMBERED that the deposition of  
16 EmmaLee Robinson was taken by the attorney for the  
17 defendant at the office of Beard St. Clair Gaffney  
18 PA, located at 955 Pier View Drive, Idaho Falls,  
19 Idaho, before Sheila T. Fish, Court Reporter and  
20 Notary Public, in and for the State of Idaho, in the  
21 above-entitled matter.  
22  
23  
24  
25 Reported by: Sheila T. Fish, CSR NO. 906, RPR, CRR

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1 A P P E A R A N C E S  
2  
3 For the Defendant:  
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22 BY: BRYAN SMITH  
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24 Idaho Falls, Idaho 83402  
25 (208) 524-0731

Also Present:  
Gregory Graf

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1 (The deposition proceeded at 9:07 a.m.  
2 as follows:)  
3 EMMALEE ROBINSON,  
4 produced as a witness at the instance of the  
5 defendant, having been first duly sworn, was examined  
6 and testified as follows:  
7  
8 EXAMINATION  
9 BY MR. ALLEN:  
10 Q. Just for the record, this is the time  
11 and place for the deposition of EmmaLee Robinson.  
12 A. Yes.  
13 Q. And it's being taken pursuant to the  
14 Idaho Rules of Civil Procedure.  
15 Do you mind if I call you EmmaLee?  
16 A. Yes. Please.  
17 Q. Thank you. The reporter checked the  
18 spelling on your name before we started so I won't  
19 have you spell that for her.  
20 Have you ever been deposed before?  
21 A. No.  
22 Q. Okay. Have you ever attended a  
23 deposition before?  
24 A. No.  
25 Q. Okay. Has the process of a deposition

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1 been explained to you?  
 2 A. Yes.  
 3 Q. Okay. Just to get us started and make  
 4 sure that we're creating a clean record, let me go  
 5 over a couple of rules with you.  
 6 A. Uh-huh.  
 7 Q. Before I do that, I'm going to grab  
 8 everybody some water.  
 9 So a couple of rules. The first one  
 10 you're already doing really well on. And that is  
 11 that we don't talk over each other. So just kind of  
 12 wait for my question, and I'll do my best to wait for  
 13 your answer. In at least American conversation we  
 14 tend to talk over each other a lot. We tend to  
 15 anticipate questions, anticipate answers. That makes  
 16 it really hard for her because she's trying to take  
 17 down everything we're saying. So I'll do my best to  
 18 not start a question before you've answered and ask  
 19 you to do the same.  
 20 Also, your answers have to be either yes  
 21 or no, affirmative, negative. You can't use, uh-huhs  
 22 and uh-uhs?  
 23 A. Uh-huh.  
 24 Q. It's really hard for her to transcribe.  
 25 And I'm terrible about that so you may catch me and

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1 I'll do my best also.  
 2 MR. SMITH: I'll let him know.  
 3 MR. ALLEN: He will, in fact, remind me.  
 4 Q. BY MR. ALLEN: It's not a marathon.  
 5 It's not a race. So any time you want to take a  
 6 break let me know. We can do that at any time.  
 7 We're not testing your endurance. The only thing I  
 8 would ask is if I've asked a question we get the  
 9 answer to that question before we break. Because  
 10 this is about your knowledge, your memory, your  
 11 testimony, not what someone might remind you of off  
 12 the record.  
 13 Is there any reason that you can't fully  
 14 and completely answer any questions I present to you  
 15 today?  
 16 A. Not that I know of.  
 17 Q. Okay. I mean, obviously, you may not  
 18 know the answer.  
 19 A. Uh-huh.  
 20 Q. But not under the influence of any  
 21 medication or anything that would prevent you from  
 22 accurately recalling events?  
 23 A. No.  
 24 Q. Okay. Let me get just a little personal  
 25 background on you. Where do you reside?

Page 7

1 A. Full address?  
 2 Q. I don't need the full address just --  
 3 A. Idaho Falls.  
 4 Q. Okay. You reside here in Idaho Falls.  
 5 How long have you lived here?  
 6 A. I've lived here for four -- almost five  
 7 years.  
 8 Q. Okay. Where were you before that?  
 9 A. I was in Reston, Virginia.  
 10 Q. What did you do there?  
 11 A. When did I what?  
 12 Q. What did you do there?  
 13 A. I was an insurance agent.  
 14 Q. So you were in insurance there as well?  
 15 A. Uh-huh. Yes.  
 16 Q. And that is your current occupation now,  
 17 correct?  
 18 A. Yes.  
 19 Q. How long have you been in insurance?  
 20 A. 20 years.  
 21 Q. Okay. Is that your full career?  
 22 A. Yes.  
 23 Q. Okay. I won't pry into prior  
 24 occupations then. How about education? Where did  
 25 you go to school?

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1 A. I went to school at ISU and Ricks  
 2 College.  
 3 Q. Okay.  
 4 A. When it was Ricks.  
 5 Q. Okay. So you were here before Virginia?  
 6 A. Yeah, I was.  
 7 Q. Okay. Did you grow up here?  
 8 A. I did.  
 9 Q. Okay. When did you leave here?  
 10 A. I left here shortly after graduation.  
 11 Q. From high school?  
 12 A. For various things, uh-huh. Yes.  
 13 Q. All right. I understand that you're on  
 14 the board of White Pine?  
 15 A. Yes. I am.  
 16 Q. How did you come about being on the  
 17 board of White Pine?  
 18 A. I was elected.  
 19 Q. Okay. Did you pursue that opportunity  
 20 or did somebody pursue you? How did that come about?  
 21 MR. SMITH: Does that really matter for this  
 22 case?  
 23 MR. ALLEN: I'm just trying to get some  
 24 background on the witness.  
 25 MR. SMITH: Well, you know where she lives,

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1 you know -- I mean, what does White Pine have to do  
2 with background?  
3 **MR. ALLEN:** Trying to get familiar with the  
4 witness. Is there a reason we can't explore the  
5 question?  
6 **MR. SMITH:** It's not my deposition, but I'm  
7 just questioning why you want to know about White  
8 Pine.  
9 **MR. ALLEN:** Okay. I just want to get  
10 familiar with the witness.  
11 **THE WITNESS:** I was asked to run.  
12 **Q. BY MR. ALLEN:** Okay.  
13 A. Yes.  
14 **Q. Do you -- are you involved in any other**  
15 **voluntary service?**  
16 A. I'm involved in NAIFA.  
17 **Q. What is NAIFA?**  
18 A. National Association of Insurance and  
19 Financial Advisers.  
20 **Q. NAIFA. What's your involvement in**  
21 **NAIFA?**  
22 A. I am the chairman for the PAC of Idaho  
23 and also the grassroots chair.  
24 **Q. Enlighten me. What's the difference**  
25 **between the grassroots chair and the chairman for the**

Page 10

1 **PAC?**  
2 A. Chairman for the PAC you're involved in  
3 getting donations, getting people to contribute to  
4 the PAC.  
5 **Q. Okay.**  
6 A. Work more with national on the PAC side  
7 versus the grassroots chair.  
8 **Q. Okay. What does the grassroots chair**  
9 **do?**  
10 A. Build relationships.  
11 **Q. Okay.**  
12 A. Spend money.  
13 **Q. That's probably more fun than trying to**  
14 **get money?**  
15 A. A lot more fun.  
16 **Q. All right. Who knows you are here**  
17 **today?**  
18 A. My husband does.  
19 **Q. Okay.**  
20 A. Chad knows I'm here today. My office  
21 manager knows I'm here today. My friend Vicky knows  
22 I'm here today. I think that's about it.  
23 **Q. Who is your office manager?**  
24 A. Danell Tanner.  
25 **Q. For the reporter's benefit, how do you**

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1 **spell her first name?**  
2 A. D-a-n-e-l-l.  
3 **Q. And your said your friend Vicky?**  
4 A. Uh-huh.  
5 **Q. What's her last name?**  
6 A. Sayers. S-a-y-e-r-s.  
7 **Q. How do you spell her first name?**  
8 A. Vicky. I believe it's Victoria,  
9 technically.  
10 **Q. And what's your husband's name?**  
11 A. Mark, M-a-r-k. Same last name.  
12 **Q. Okay. And you said Chad. I assume**  
13 **you're referring to Chad Christensen?**  
14 A. Yes.  
15 **Q. Did you discuss this deposition with**  
16 **your husband?**  
17 A. Not that much.  
18 **Q. Okay. At all?**  
19 A. I told him I was coming.  
20 **Q. Okay.**  
21 A. Uh-huh.  
22 **Q. Anything else?**  
23 A. Not really, no.  
24 **Q. How about Danell? Did you discuss it**  
25 **with Danell?**

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1 A. No. That I would be busy.  
2 **Q. You told her you would be occupied?**  
3 A. Uh-huh.  
4 **Q. Okay. How about Vicky?**  
5 A. Vicky, I told her I couldn't talk to her  
6 this morning.  
7 **Q. Told her why?**  
8 A. Yeah.  
9 **Q. You didn't have a conversation about it**  
10 **at all?**  
11 A. No.  
12 **Q. Okay. How about with Chad? Have you**  
13 **discussed it with Chad?**  
14 A. Not very much.  
15 **Q. Okay. What discussions have you had**  
16 **with Chad?**  
17 A. What?  
18 **Q. What discussions have you had with Chad**  
19 **about the deposition?**  
20 A. Today?  
21 **Q. At all.**  
22 A. At all. None today. He sent me a  
23 picture of a mug last night.  
24 **Q. Okay.**  
25 A. That was about it. He said his attorney

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1 would be here.  
 2 **Q. And he is. That's it? No other**  
 3 **conversations about it?**  
 4 A. Not that I recall.  
 5 **MR. ALLEN:** Okay. Let's go ahead and mark  
 6 this as an exhibit.  
 7 ([Exhibit 1](#) marked.)  
 8 **Q. BY MR. ALLEN:** I'll hand you what's been  
 9 marked as [Exhibit 1](#).  
 10 **Have you seen that before?**  
 11 A. Yes.  
 12 **Q. Okay. Normally this would have been**  
 13 **served on you but Mr. Smith was courteous enough to**  
 14 **accept that on your behalf. So I wasn't sure whether**  
 15 **you had actually reviewed a copy.**  
 16 **This has some document requests in it.**  
 17 **So let me have you turn to page 2.**  
 18 A. Uh-huh.  
 19 **Q. We'll just go through those relatively**  
 20 **quickly. First request asks for true and correct**  
 21 **copies of all communications between you and Chad**  
 22 **Christensen relating to Gregory Graf.**  
 23 A. Uh-huh.  
 24 **Q. Have you brought any responsive**  
 25 **documents to that request today?**

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1 A. Yes.  
 2 **Q. Okay. Second question is communications**  
 3 **between you and Greg Pruett related to Gregory Graf.**  
 4 **Do you have any documents responsive to that request**  
 5 **today?**  
 6 A. I have those, yes.  
 7 **Q. Okay. Third is communications with Keep**  
 8 **Idaho Free relating to Gregory Graf. Any of those**  
 9 **documents in your --**  
 10 A. Yes.  
 11 **MR. SMITH:** Which one are you reading from on  
 12 that one?  
 13 **MR. ALLEN:** What's that?  
 14 **MR. SMITH:** Which one did you read from on  
 15 that?  
 16 **MR. ALLEN:** That was C.  
 17 **MR. SMITH:** Oh, there it is. Okay.  
 18 **Q. BY MR. ALLEN:** True and correct copies  
 19 **of any and all documents or information provided to**  
 20 **you by Chad Christensen relating to Gregory Graf. Do**  
 21 **you have those today?**  
 22 A. Yes.  
 23 **Q. Okay. Are there -- let's shorten this**  
 24 **up a bit. Take a look through that list. Are there**  
 25 **any requests there for which you do not have any**

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1 **responsive documents?**  
 2 A. You have all of them.  
 3 **MR. ALLEN:** Okay. Can I get those and take a  
 4 look at them and --  
 5 **MR. SMITH:** Sure.  
 6 **MR. ALLEN:** That might tell us where we're  
 7 going to go here today.  
 8 **MR. SMITH:** Let me see what happened here.  
 9 Oh, okay. I'm not sure how my secretary did this  
 10 this morning. She was supposed to make me four  
 11 copies but I don't know what I've got now. Oh, okay.  
 12 So what I've got -- do you want to go off the record  
 13 for this?  
 14 **MR. ALLEN:** Let's go off the record.  
 15 (A discussion was held off the record.)  
 16 ([Exhibit 2](#) marked.)  
 17 **Q. BY MR. ALLEN:** Take a look at [Exhibit 2](#)  
 18 **there. Can you identify that for me?**  
 19 A. Yes. This is text messages between  
 20 myself and Chad Christensen.  
 21 **Q. Okay. What time period does this cover?**  
 22 **MR. SMITH:** Is this [Exhibit 2](#)?  
 23 **MR. ALLEN:** Yes.  
 24 **THE WITNESS:** [Exhibit 2](#), yeah.  
 25 Time period covers between when -- I

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1 don't recall, honestly.  
 2 **Q. BY MR. ALLEN:** Okay.  
 3 A. It had to have been after the phone  
 4 conversation with Mr. Graf.  
 5 **Q. Okay. So these are -- what are the -- I**  
 6 **guess, what were the limiting factors in the texts**  
 7 **that you decided to provide. Is it just texts that**  
 8 **specifically reference Mr. Graf?**  
 9 A. Yes.  
 10 **Q. Okay. I'll probably come back to that**  
 11 **with some questions after I've had a chance to look**  
 12 **over it. We'll take a break at some point in time**  
 13 **and I'll do that.**  
 14 **Let's mark the next --**  
 15 **MR. SMITH:** What's this one I'm giving him?  
 16 This is --  
 17 **THE WITNESS:** That was just something I  
 18 provided for you. It's where I met Graf -- Greg.  
 19 **MR. SMITH:** Okay.  
 20 **THE WITNESS:** Uh-huh.  
 21 **MR. ALLEN:** Is there a note on there we need  
 22 to -- oh, it's on a sticky.  
 23 ([Exhibit 3](#) marked.)  
 24 **Q. BY MR. ALLEN:** Okay. Tell me what  
 25 [Exhibit 3](#) is.



1 A. [Exhibit 3](#) is a conversation on East  
 2 Idaho News where I guess I had my first  
 3 correspondence with Mr. Graf.  
 4 Q. Okay. Mr. Graf appears to be responding  
 5 to you on this post. It looks like he's actually  
 6 tagged your name. Do you recall had you posted  
 7 something on this particular comment thread?  
 8 A. He said that Chad Christensen had  
 9 threatened him with a gun and I asked him if that  
 10 really happened.  
 11 Q. Okay.  
 12 A. And posted pictures of a card Chad sent  
 13 him afterwards.  
 14 Q. So this comment here from Greg Graf was  
 15 in response to your inquiry about whether that really  
 16 happened?  
 17 A. Uh-huh.  
 18 Q. Okay. Is your inquiry still on  
 19 Facebook?  
 20 A. No. I believe I deleted it.  
 21 Q. Okay. We'll see whether or not we come  
 22 back to that one.  
 23 MR. ALLEN: What's our next one?  
 24 MR. SMITH: These are Facebook Messenger  
 25 correspondence with Greg Graf.

1 Q. So that's a post from East Idaho News.  
 2 It looks like they posted an article. Did you read  
 3 that article?  
 4 A. Yes. I did.  
 5 Q. Okay.  
 6 MR. ALLEN: What's our next one over there?  
 7 MR. SMITH: These are Greg Pruett texts.  
 8 ([Exhibit 6](#) marked.)  
 9 Q. BY MR. ALLEN: Okay. So this is text  
 10 communications between you and Greg Pruett?  
 11 A. Yes.  
 12 Q. It looks like the first text on this  
 13 thread is dated October 31st?  
 14 A. Yes.  
 15 Q. Is that your first communication with  
 16 Greg Pruett?  
 17 A. Yes.  
 18 Q. You hadn't had any communication with  
 19 him prior to that day?  
 20 A. I'll have to look at my phone. I don't  
 21 recall. We talked on the phone on a Saturday.  
 22 Q. Okay. This text was sent Saturday,  
 23 October 31st. Would that have been the same day,  
 24 same Saturday?  
 25 A. I can check in my phone for sure.

1 ([Exhibit 4](#) and [Exhibit 5](#) marked.)  
 2 Q. BY MR. ALLEN: Before we get to [4](#), this  
 3 is [Exhibit 5](#).  
 4 A. Uh-huh.  
 5 Q. Do you recognize this as the original  
 6 Facebook post that resulted in the comments that are  
 7 reflected in [Exhibit 3](#)?  
 8 A. Yes.  
 9 Q. Okay. All right. Let's take a look at  
 10 [Exhibit 4](#). Can you identify for me what Exhibit 4  
 11 is?  
 12 A. This is message requests -- it was a  
 13 message sent to Greg Graf after he friended me on  
 14 Facebook.  
 15 Q. Okay. So it's your testimony that Greg  
 16 sent you a Facebook friend request --  
 17 A. Yes.  
 18 Q. -- and then this is some Facebook  
 19 Messenger communication between the two of you?  
 20 A. Yes.  
 21 Q. It's very likely that I'll have  
 22 questions about that. Let's mark this one next.  
 23 Well, actually, let's not yet.  
 24 Take a look again at [Exhibit 5](#).  
 25 A. Uh-huh.

1 Q. Okay.  
 2 A. It would have been Saturday the 24th.  
 3 Q. Saturday the 24th of October?  
 4 A. Yes.  
 5 Q. Okay. Tell me about that call.  
 6 A. I had just found out that he wanted  
 7 to -- that he had the recording, honestly. And --  
 8 Q. Okay. So on Saturday you found out that  
 9 he had the recording?  
 10 A. Yes.  
 11 Q. How did you find out that he had the  
 12 recording?  
 13 A. Chad had told me.  
 14 Q. And do you know how Greg came about  
 15 having the recording?  
 16 A. No. I do not.  
 17 Q. You don't know who gave it to him?  
 18 A. No.  
 19 Q. Okay. Go ahead. Tell me about the  
 20 conversation then.  
 21 A. It was very brief. He just told me he  
 22 was going to be doing an article on it.  
 23 Q. Did he call you or did you call him?  
 24 A. I called him.  
 25 Q. Okay. And what was the purpose of the

Page 21

1 **call, from your perspective?**  
 2 A. I didn't know who he was. I needed to  
 3 know who was writing an article.  
 4 **Q. Okay. What did you ask him when you**  
 5 **called him?**  
 6 A. Who he was.  
 7 **Q. What did he tell you?**  
 8 A. He explained -- his name. He explained  
 9 what Idaho Dispatch was.  
 10 **Q. Okay. And what else?**  
 11 A. I don't recall.  
 12 **Q. Did you ask him anything else besides**  
 13 **who he was?**  
 14 A. I wanted to know what his intentions  
 15 were.  
 16 **Q. Okay. Did he tell you his intentions?**  
 17 A. My opinion, no.  
 18 **Q. Okay. What did he tell you?**  
 19 A. He told me that this feud had been going  
 20 on for a little while and I really didn't care after  
 21 that, so I cut him off.  
 22 **Q. Okay. Anything else that you can recall**  
 23 **from that conversation?**  
 24 A. I asked him to keep names out of it,  
 25 people's names out of it. I didn't want other names

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1 to be released. There was a lot of name dropping  
 2 going on.  
 3 **Q. Okay. Any particular names that you**  
 4 **recall asking him to keep out of it?**  
 5 A. I asked him to keep Tony Lima's name  
 6 out.  
 7 **Q. Okay.**  
 8 A. And that was about it. I think just  
 9 other names. I didn't want names at all. I didn't  
 10 want Rod Furniss' name to be in it, but it was.  
 11 **Q. Okay. How did Tony's name come up?**  
 12 A. Because I know him from the school board  
 13 and in the recording Greg works with him.  
 14 **Q. Okay. Did you ask him to keep Rod**  
 15 **Furniss' name out of it?**  
 16 A. Yes.  
 17 **Q. Okay.**  
 18 A. I wanted all names left out.  
 19 **Q. So it looks like this communication**  
 20 **relates, at least in part, to a letter -- referring**  
 21 **to Exhibit 6 -- to a letter that you received from**  
 22 **me; is that correct?**  
 23 **MR. SMITH:** I didn't hear that. A letter  
 24 what?  
 25 **MR. ALLEN:** A letter that she received from

Page 23

1 me.  
 2 **THE WITNESS:** Yes.  
 3 **Q. BY MR. ALLEN: Okay. You reference**  
 4 **another lawsuit. Are you involved in litigation**  
 5 **right now?**  
 6 A. Yes. I am.  
 7 **Q. What kind of litigation is that?**  
 8 A. White Pine Charter School.  
 9 **Q. Okay. Is White Pine the plaintiff or**  
 10 **the defendant?**  
 11 A. They are the plaintiff.  
 12 **Q. Who is the defendant in that case?**  
 13 A. Jeremy Clarke.  
 14 **Q. Is he the former principal?**  
 15 A. Yes.  
 16 **Q. Take a look at the first page of**  
 17 **Exhibit 6, just your first text there. I'm having a**  
 18 **little trouble with that. It looks like maybe some**  
 19 **auto corrects or something.**  
 20 A. Yeah.  
 21 **Q. Can you decipher that first sentence --**  
 22 **excuse me, the second sentence there?**  
 23 A. I don't have confidence that Chad knew  
 24 how I feel -- felt, and he didn't have my permission  
 25 to use the recording.

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1 **Q. Okay. So you are telling Greg here that**  
 2 **he does not have permission to share what you**  
 3 **recorded?**  
 4 A. Yes.  
 5 **Q. Okay. All right. What's next?**  
 6 **MR. SMITH:** We have here some fabulous  
 7 e-mails from Stephanie Mickelsen.  
 8 ([Exhibit 7](#) marked.)  
 9 **Q. BY MR. ALLEN: Can you identify**  
 10 **Exhibit 7 for us?**  
 11 A. Yes. This is e-mail correspondence  
 12 between myself and the chairmans of the Board of the  
 13 Federation and I believe the director of sales for  
 14 Farm Bureau for the state of Idaho and Stephanie  
 15 Mickelsen.  
 16 **Q. So it looks like you addressed it to**  
 17 **Stephanie, the original correspondence?**  
 18 A. Uh-huh. Yes.  
 19 **Q. On October 23rd you addressed to**  
 20 **Stephanie and then copied a number of other people**  
 21 **from --**  
 22 A. Yes. I did.  
 23 **Q. Who is Bryan Searle?**  
 24 A. I'll have to look up from Farm Bureau.  
 25 I don't remember.

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1 Q. Okay. So he's a Farm Bureau employee of  
2 some kind?  
3 A. Yes.  
4 Q. The rest of these we can tell that from  
5 the e-mail addresses but his was not there. So I  
6 just wanted to clarify that. And then it looks like  
7 Stephanie responded to you three days later.  
8 A. Yes. From a different e-mail address.  
9 Q. And you responded to her the following  
10 day?  
11 A. Yes.  
12 Q. All right. Take a look at that last  
13 page. Tell me what that is.  
14 A. Her name had always sounded familiar to  
15 me. And I recalled why after corresponding with her.  
16 She shared the article about the school.  
17 Q. Okay.  
18 A. Shortly within a few minutes after it  
19 came out.  
20 Q. So this Idaho Ed News article that she  
21 had posted here --  
22 A. Uh-huh.  
23 Q. -- was this somehow attached to the  
24 correspondence?  
25 A. No. But I referenced it.

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1 Q. Okay. So you've attached it here --  
2 A. Uh-huh.  
3 Q. -- because you referenced it in the  
4 e-mail?  
5 A. Uh-huh. Yes.  
6 Q. All right. Thank you. I just wanted to  
7 clarify and understand where and why that was  
8 included. So this was just printed from Stephanie's  
9 Facebook feed?  
10 A. Yes.  
11 Q. I don't think I've seen that article.  
12 Is that about Jeremy?  
13 A. Yes.  
14 MR. ALLEN: Okay. What's next?  
15 MR. SMITH: We have some Messenger documents  
16 with Chad.  
17 THE WITNESS: This is from his disabled  
18 Facebook account.  
19 MR. ALLEN: Okay.  
20 THE WITNESS: So you'll only see one side.  
21 (Exhibit 8 marked.)  
22 Q. BY MR. ALLEN: So tell me what I'm  
23 seeing here. The side that I can see, is that your  
24 correspondence or his correspondence?  
25 A. That would be my correspondence.

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1 Q. All right. So that's your communication  
2 to him and what we can't see are his responses?  
3 A. Yes.  
4 Q. And you indicated that the account is  
5 disabled?  
6 A. Yes.  
7 Q. Okay. Do you know if that account has  
8 been deleted?  
9 A. No clue.  
10 Q. You don't know? Okay.  
11 MR. ALLEN: I want to take a minute to look  
12 through that one before I have any specific  
13 questions. What's next?  
14 MR. SMITH: We have some more messaging on  
15 Signal between her and Chad.  
16 THE WITNESS: This is when I joined Signal.  
17 (Exhibit 9 marked.)  
18 Q. BY MR. ALLEN: Okay. Tell me what this  
19 is.  
20 A. Just when I joined Signal.  
21 Q. What is Signal?  
22 A. I have no clue. It's a messaging app.  
23 Q. Okay. I'm not familiar with Signal.  
24 So...  
25 A. Neither am I.

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1 Q. So you joined Signal, it looks like, on  
2 December 8th?  
3 A. Uh-huh.  
4 Q. Still use the app?  
5 A. Not very often.  
6 Q. Okay. And I take it from this then you  
7 don't have any Signal communication --  
8 A. No. I do not.  
9 Q. -- with Chad --  
10 A. And the call there was a butt dial.  
11 Sorry, I should clarify. I didn't even know you  
12 could call on there.  
13 Q. So it says there about two-thirds of the  
14 way down the page: Chad Christensen set disappearing  
15 message time to 30 minutes?  
16 A. Yes.  
17 Q. Do you know what that means?  
18 A. It means that they disappear after  
19 30 minutes.  
20 Q. All messages?  
21 A. I believe so.  
22 Q. Okay. So --  
23 A. I'm not as -- I'm not familiar with  
24 Signal though.  
25 Q. So if he or you had sent a message by

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1 **Signal after that occurrence, that message would have**  
 2 **disappeared?**  
 3 A. From what I understand.  
 4 **Q. Okay. Do you have any recollection**  
 5 **whether Chad sent you any messages by Signal after**  
 6 **that date?**  
 7 A. Yes.  
 8 **Q. Okay. What's your recollection?**  
 9 A. It usually had to do --  
 10 **Q. He did?**  
 11 A. Yes, he did.  
 12 **Q. Okay. Do you recall whether he sent you**  
 13 **any messages related to Mr. Graf by Signal after that**  
 14 **date?**  
 15 A. There's probably been a few.  
 16 **Q. Okay. Do you have any specific**  
 17 **recollection of any of them?**  
 18 A. Specific would probably be just the  
 19 whole situation, frustration more than anything.  
 20 **Q. Okay. Frustration by virtue of what?**  
 21 A. That I'm even involved in this.  
 22 **Q. Okay.**  
 23 **MR. ALLEN:** All right. What's next?  
 24 **MR. SMITH:** We have an ever illuminating page  
 25 of Keep Idaho Free.

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1 **THE WITNESS:** I've never communicated with  
 2 them.  
 3 **MR. ALLEN:** Okay.  
 4 **MR. SMITH:** What's that?  
 5 **THE WITNESS:** Never communicated with them.  
 6 ([Exhibit 10](#) marked.)  
 7 **Q. BY MR. ALLEN: Is this a page from**  
 8 **Facebook Messenger?**  
 9 A. Yes.  
 10 **Q. Okay. So this is just indicating that**  
 11 **you haven't had any communication with Keep Idaho**  
 12 **Free by Facebook Messenger?**  
 13 A. Yes.  
 14 **Q. Okay. And do I understand your**  
 15 **testimony correctly that you haven't had any**  
 16 **communication with Keep Idaho Free?**  
 17 A. No.  
 18 **MR. ALLEN:** Is that it or one more?  
 19 **MR. SMITH:** One more. This appears to be  
 20 some messaging on Facebook between her and Greg  
 21 Pruett.  
 22 ([Exhibit 11](#) marked.)  
 23 **Q. BY MR. ALLEN: So Mr. Smith identified**  
 24 **this but he's not our witness. So can you tell me**  
 25 **what this is?**

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1 A. It is messaging between me and  
 2 Mr. Pruett.  
 3 **Q. Okay. All on Facebook Messenger?**  
 4 A. Uh-huh.  
 5 **Q. Okay. Is that first -- I'm trying to**  
 6 **decipher. Is that first block a screen grab of a --**  
 7 A. Yes.  
 8 **Q. Okay. What is your understanding of**  
 9 **what Idaho Dispatch is?**  
 10 A. A news outlet.  
 11 **Q. Okay. Do you know who is behind that**  
 12 **news outlet?**  
 13 A. Who is what?  
 14 **Q. Who is behind that news outlet? Who**  
 15 **runs it?**  
 16 A. I was told Greg Pruett.  
 17 **Q. Okay. The message below that, is that**  
 18 **your message or is that Greg's message?**  
 19 A. That would be my message.  
 20 **Q. Okay. That's all of the correspondence**  
 21 **you brought with you today?**  
 22 A. That is.  
 23 **Q. Okay. Do you have a copy -- do you**  
 24 **still have a copy of the recording that you made of a**  
 25 **conversation with Mr. Graf?**

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1 A. I believe I do.  
 2 **Q. Okay.**  
 3 A. I switched phones recently.  
 4 **Q. Okay. But you didn't bring a copy of**  
 5 **that with you today?**  
 6 A. No. I was told you have one.  
 7 **Q. Okay. Do you have a transcript of that**  
 8 **recording?**  
 9 A. No. I do not.  
 10 **Q. Okay. Do you have any recorded**  
 11 **conversations with Jennifer Ellis?**  
 12 A. No.  
 13 **Q. Okay. Do you have any recorded**  
 14 **conversations with Stephanie Mickelsen?**  
 15 A. No.  
 16 **Q. Okay. Have you ever held political**  
 17 **office?**  
 18 A. No.  
 19 **Q. Do you have plans or aspirations to run**  
 20 **for political office?**  
 21 A. No.  
 22 **Q. Aside from your involvement with**  
 23 **NAIFA -- I think that's how you said it?**  
 24 A. Yes.  
 25 **Q. The PAC and the grassroots -- is that a**

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1 separate organization, the grassroots portion of  
2 that?  
3 A. Organization or chair?  
4 Q. Yes, is there --  
5 A. It's a chair.  
6 Q. I mean, you're the chair but is there --  
7 you know, is there a separate organization that NAIFA  
8 has created that is the grassroots portion of the  
9 movement, the efforts?  
10 A. Not that I recall.  
11 Q. Okay. Aside from your involvement with  
12 NAIFA, do you have any involvement with politics?  
13 A. State Farm asks me to help with  
14 grassroots.  
15 Q. Okay. What type of grassroots effort is  
16 that on behalf of State Farm?  
17 A. To be involved.  
18 Q. Okay. In anything in particular?  
19 A. No.  
20 Q. With respect to NAIFA, what does the --  
21 what type of work does the grassroots efforts  
22 involve?  
23 A. Building relationships and spending  
24 money.  
25 Q. Building relationships with anyone in

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1 particular?  
2 A. No.  
3 Q. Okay. Let's talk about Mr. Christensen.  
4 How do you know Mr. Christensen?  
5 A. I'm confused with that.  
6 Q. Well, how do you know Chad?  
7 A. Of him? Introduced?  
8 Q. Yeah. How did you get to know him?  
9 A. Our sons played baseball together.  
10 Q. Okay. Is that your first introduction  
11 to Mr. Christensen is through your son's baseball?  
12 A. I don't recall.  
13 Q. Okay. How long have you known him?  
14 A. Just baseball last year.  
15 Q. Okay. So just a year now?  
16 A. Yes.  
17 Q. Or a year and change, whenever baseball  
18 started. Do you recall when the season started?  
19 A. Probably a year ago.  
20 Q. Okay. How would you describe your  
21 relationship with Chad?  
22 A. Friends.  
23 Q. Okay.  
24 A. Enemies, politically.  
25 Q. Depends on the day?

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1 A. We don't align.  
2 Q. Okay.  
3 A. Always. He opposes my bills.  
4 Q. What's that?  
5 A. He opposes my bills.  
6 Q. Oh, all right.  
7 Did you have a bill that you were  
8 promoting?  
9 A. Several.  
10 Q. Okay. Let's back up for just a second  
11 and talk about that. What bills have you been  
12 involved in promoting?  
13 A. I was involved in the no insurance auto  
14 insurance bill. I've been involved -- you're asking  
15 a lot. I've been involved in the annuity bill. I've  
16 been involved in the bill for -- you want all of  
17 them?  
18 Q. To the best of your recollection.  
19 A. I've been involved with a bill, data  
20 security for insurance advisers. I liked the  
21 education bill for online schools that -- for funding  
22 for online schools during COVID.  
23 Q. Okay. Those are the ones you can  
24 remember right now?  
25 A. There was one that didn't go off the

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1 ground about the state treasurer doing investment  
2 accounts for those that did not have it individually  
3 available through work.  
4 Q. Okay.  
5 A. Briefly.  
6 Q. So of these that you've been involved  
7 with promoting, did Chad oppose all of them?  
8 A. Pretty close.  
9 Q. Okay. Do you recall the results on most  
10 of them? Have they passed? Have they become law?  
11 Or they just -- did they fail?  
12 A. The no insurance became law and the  
13 annuity has become law. I don't recall about the  
14 rest.  
15 Q. Okay. It would be fair to say that most  
16 of your interest in promoting legislation has been  
17 work related?  
18 A. And education.  
19 Q. And education.  
20 A. I'm very passionate about education.  
21 Q. You'd have to be to be on a charter  
22 school board. Explain to me the employment  
23 relationship with Chad. Does he work for you or does  
24 he just -- I've heard conflicting descriptions. Is  
25 he your employee?

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1 A. Yes. He is.  
 2 **Q. So he's employed by your entity?**  
 3 A. Yes.  
 4 **Q. What's the name of that entity?**  
 5 A. EmmaLee Robinson.  
 6 **Q. Is that a corporation --**  
 7 A. No. It's not.  
 8 **Q. -- an LLC?**  
 9 **It's not incorporated?**  
 10 A. No.  
 11 **Q. Okay. And that is a State Farm agency?**  
 12 A. Yes.  
 13 **Q. What kind of products does your agency**  
 14 **offer?**  
 15 A. Auto, home, business, farm, life  
 16 annuity, mutual funds, investments, liability  
 17 umbrella, business auto. How many do you want? We  
 18 sell over 100 products.  
 19 **Q. Okay.**  
 20 A. Long-term -- no, we don't do -- we do  
 21 long-term care through universal life. We do all  
 22 types of life insurance: Whole life, universal life,  
 23 term life insurance. We do disability insurance; we  
 24 do health insurance; we do Medicare supplements. We  
 25 do -- do you want more?

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1 **Q. You do a lot?**  
 2 A. Yeah.  
 3 **Q. Okay. I am not an expert on the**  
 4 **insurance business by any stretch but I have some**  
 5 **vague understanding that certain agents do certain**  
 6 **things, other agents do other things. Are there --**  
 7 **are there licensing requirements with respect to the**  
 8 **different products?**  
 9 A. Yes. There are.  
 10 **Q. So that a person that can do home and**  
 11 **auto, for example, might not be able to do life?**  
 12 A. That is correct.  
 13 **Q. Okay. What is -- what is the nature of**  
 14 **Chad's business as an agent? In other words, what**  
 15 **products is he qualified to offer?**  
 16 A. He can offer home, commercial, farm and  
 17 ranch, auto, and he's had health that he's referred  
 18 to me and life that he's referred to me.  
 19 **Q. Okay. Do you know anything about Chad's**  
 20 **association with Greg Pruett?**  
 21 A. No.  
 22 **Q. Okay. Do you know anything about Chad's**  
 23 **association with the Idaho Freedom Foundation?**  
 24 A. A little bit.  
 25 **Q. What do you know about Chad's**

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1 **association with the Idaho Freedom Foundation?**  
 2 A. I thought it was a membership club. I  
 3 am so sorry. And I thought he was a member of it and  
 4 he clarified that.  
 5 **Q. Okay.**  
 6 A. Very naive.  
 7 **Q. All right. So what is your**  
 8 **understanding of what Idaho Freedom Foundation is**  
 9 **now?**  
 10 A. Honestly, they remind me of an  
 11 organization to keep their values that Idaho is  
 12 founded on: Freedom, constitutional rights, and  
 13 keeping them the way they are.  
 14 **Q. Okay. Okay. You said you thought Chad**  
 15 **was a member?**  
 16 A. Yes.  
 17 **Q. And he corrected you?**  
 18 A. I didn't know he didn't have membership.  
 19 **Q. What -- what did he tell you when he**  
 20 **corrected your perception?**  
 21 A. He said it isn't a membership club.  
 22 **Q. Okay. Anything beyond that?**  
 23 A. Not really. I had to ask clarifying  
 24 questions.  
 25 **Q. Okay. Do you know if Chad has any**

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1 **association with keepidahofree.org?**  
 2 A. Meaning?  
 3 **Q. Do you know if he has any involvement**  
 4 **with that website? Just yes or no. Do you know? If**  
 5 **you don't know, that's okay. I'm just --**  
 6 A. None that I know of.  
 7 **Q. Okay. Do you know Eric Parker?**  
 8 A. Personally?  
 9 **Q. Yes.**  
 10 A. No.  
 11 **Q. Okay. Do you know of Eric Parker?**  
 12 A. Yes.  
 13 **Q. What do you know of Eric Parker?**  
 14 A. First came on about Eric Parker was  
 15 through Greg Graf.  
 16 **Q. Okay.**  
 17 A. And I had no clue who he was. I had no  
 18 clue what the Ammon Bundy standoff -- I couldn't  
 19 remember what it was. And so I started doing  
 20 research about it. Greg Graf sent me an article by  
 21 NPR and I read the article from NPR. I listened to  
 22 the podcast about him. Do you want the name of the  
 23 podcast that I listened to?  
 24 **Q. Sure.**  
 25 A. What's Happening, Idaho? I listened to

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1 that podcast of him.  
 2 **Q. Okay.**  
 3 A. I Googled what the Ammon Bundy standoff  
 4 was because I couldn't remember and I read about him  
 5 there.  
 6 **Q. Okay. Have you talked with Chad about**  
 7 **Eric Parker at all?**  
 8 A. Yes.  
 9 **Q. Okay. Tell me about those**  
 10 **conversations.**  
 11 A. I asked him who Eric Parker was. I  
 12 asked him -- I can't remember the name, but Mr. Graf  
 13 told me about a group that they are involved in, and  
 14 I asked what that was.  
 15 **Q. You asked Mr. Graf --**  
 16 A. I can't remember the name of the group.  
 17 **Q. -- or you asked --**  
 18 A. I asked Chad what that group was.  
 19 **Q. Was that the Real Three Percenters or**  
 20 **Three Percenters of Idaho or the --**  
 21 A. Yeah, that's it. Yeah.  
 22 **Q. Okay. What did Chad tell you that was?**  
 23 A. He told me -- I asked him if it was a  
 24 militia. He said no.  
 25 **Q. Okay. Did you talk about it all beyond**

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1 **that?**  
 2 A. He said it's a group of people. I  
 3 Googled it because the name was weird. He told me  
 4 what the name meant.  
 5 **Q. Okay. What did he tell you it meant?**  
 6 A. It has to do with the Revolutionary War  
 7 and 3 percent of it -- something about 3 percent in  
 8 Revolutionary War.  
 9 **Q. Okay.**  
 10 A. I found it interesting because I had, I  
 11 believe, over 50 relatives that fought in the war,  
 12 that war.  
 13 **Q. Do you know Dustin Hurst?**  
 14 A. No, I do not. The name sounds familiar.  
 15 **Q. Okay. But you don't know him?**  
 16 A. I've never met him that I recall. But  
 17 the name sounds familiar.  
 18 **Q. Any recollection of ever discussing**  
 19 **Dustin with Chad?**  
 20 A. Can you tell me who he's involved with?  
 21 **Q. I think he is involved with the Idaho**  
 22 **Freedom Foundation.**  
 23 A. If I ever had a correspondence or  
 24 discussion with Chad about it, it would have had to  
 25 do with the rating on the annuity bill.

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1 **Q. Okay. Do you recall what the rating on**  
 2 **the annuity bill was?**  
 3 A. Negative 3.  
 4 **Q. Okay. All right. So we've established**  
 5 **that you know who Mr. Graf is?**  
 6 A. Yes.  
 7 **Q. We've talked about him a little bit and**  
 8 **indicated that he sent you some information related**  
 9 **to Eric Parker.**  
 10 **Let me show you exhibit -- well, you've**  
 11 **got it there.**  
 12 **Can you take a look at [Exhibit 3](#)?**  
 13 A. Yes.  
 14 **Q. So Greg's comment there, which was**  
 15 **apparently, I think you said, in response to an**  
 16 **inquiry about "did this really happen"?**  
 17 A. Yes.  
 18 **Q. This references Eric and the Idaho Three**  
 19 **Percent Militia?**  
 20 A. Uh-huh.  
 21 **Q. I assume that's the same Three Percent**  
 22 **organization that we were just discussing, at least**  
 23 **as far as you know; is that correct?**  
 24 A. Yes.  
 25 **Q. Okay. Is there communication between**

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1 **you and Mr. Graf related to Eric or the Three Percent**  
 2 **Militia or the Three Percent -- they have a name. I**  
 3 **can't remember what it is. That's not it. But is**  
 4 **there communication with Mr. Graf related to either**  
 5 **of them besides this comment here? In other words,**  
 6 **did he send you anything else? I think you said he**  
 7 **sent you a podcast?**  
 8 A. Yes.  
 9 **Q. Do you recall how he sent that to you?**  
 10 A. He tagged me on Facebook.  
 11 **Q. Okay.**  
 12 A. I believe.  
 13 **Q. Okay.**  
 14 A. I don't recall.  
 15 **Q. Okay.**  
 16 A. He could have sent it to me.  
 17 **Q. So there wasn't separate correspondence?**  
 18 **There was just a social media tag?**  
 19 A. Uh-huh. Uh-huh.  
 20 **Q. Okay. And the reason for that question**  
 21 **is because I didn't see that, that reference in this**  
 22 **correspondence here so I wanted to make sure I --**  
 23 A. Or he sent it to me or tagged it.  
 24 **Q. -- didn't miss something.**  
 25 A. Who knows.

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1 Q. Okay. When you -- looking still at  
2 [Exhibit 3](#).  
3 A. Three?  
4 Q. Yeah. When you had that brief exchange  
5 in Facebook comments with Mr. Graf, was that your  
6 first interaction with Mr. Graf?  
7 A. That I recall, yes.  
8 Q. Is that the first time you became aware  
9 of Mr. Graf?  
10 A. No.  
11 Q. You didn't know of him or --  
12 A. No.  
13 Q. -- who he was prior to that exchange?  
14 A. No.  
15 MR. ALLEN: Okay. After -- well, let's back  
16 up. Let's mark this next.  
17 ([Exhibit 12](#) marked.)  
18 Q. BY MR. ALLEN: So you've been handed  
19 [Exhibit 12](#).  
20 A. Uh-huh.  
21 Q. Do you recognize these comments?  
22 A. Yes. Very much so.  
23 Q. The first one here is I think the exact  
24 same comment that is reflected on [Exhibit 3](#); is it  
25 not?

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1 A. Yes.  
2 Q. And then the second one is another  
3 comment from Mr. Graf to you. And he says:  
4 Respectfully, are you asking for yourself or for  
5 Chad?  
6 Do you recall what your comment was that  
7 he was responding to there?  
8 A. Did Chad threaten you with a gun?  
9 Q. Okay. So same -- same comment?  
10 A. Yeah.  
11 Q. Okay.  
12 A. I -- yeah.  
13 Q. All right.  
14 A. I said: Did Chad really threaten you  
15 with a gun?  
16 Q. Okay. Mr. Graf says: I'm happy to have  
17 a detailed conversation with you about this offline  
18 that would be fair to Chad.  
19 Is that what precipitated the Facebook  
20 Messenger communication that's reflected in  
21 [Exhibit 4](#)?  
22 A. Yes.  
23 Q. Okay. Let's take a look at [Exhibit 4](#).  
24 So the first -- the first post there says: Okay, I  
25 was just sending you a message.

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1 Can you tell me what that means?  
2 A. He friended me and I had just found him  
3 and I was sending him a message.  
4 Q. Okay. So --  
5 A. Because he requested it.  
6 Q. So you were simultaneously --  
7 A. Yes.  
8 Q. -- trying to connect via Messenger?  
9 A. Uh-huh.  
10 Q. Okay. Take a look at page 2.  
11 A. Yes.  
12 Q. Before you reached out to Mr. Graf by  
13 Messenger -- let me back up.  
14 [Exhibit 12](#), we were just looking at the  
15 two comments from --  
16 A. Yes.  
17 Q. Those are not dated. Do you recall what  
18 date those comments were posted?  
19 A. It would have been October 19th.  
20 Q. Okay. So it was the same day?  
21 A. Yeah.  
22 Q. Okay.  
23 A. Minutes before.  
24 Q. Okay.  
25 A. That -- this one right here.

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1 Q. Minutes before the October 19, 3:33  
2 message?  
3 A. Yeah.  
4 Q. Okay. Within how many minutes?  
5 A. About 30.  
6 Q. Okay.  
7 A. Yes.  
8 Q. All right. Prior to reaching out to --  
9 well, let me back up.  
10 Where were you when you exchanged the  
11 comments on the article?  
12 A. I was in my office behind closed door.  
13 Q. Okay. Was Mr. Christensen in the office  
14 that day?  
15 A. Yes.  
16 Q. Prior to --  
17 A. In the basement.  
18 Q. Prior to communicating with Mr. Graf by  
19 Messenger, did you have any communication with Chad  
20 about the comments on the article?  
21 A. Prior to what?  
22 Q. Prior to initiating the communication by  
23 Messenger --  
24 A. No.  
25 Q. -- was there any communication about



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1 those comments with Mr. Christensen?  
 2 A. No.  
 3 Q. Okay. Let's take a look at page 2.  
 4 A. Yes.  
 5 Q. It's about the third message. Your --  
 6 actually, your second message. It said: No, this  
 7 isn't for Chad. I hired him a few weeks ago. Our  
 8 boys play baseball together.  
 9 A. Yes.  
 10 Q. I'm starting to see some red flags and  
 11 your comment concerned me.  
 12 Can you tell me what you're referring to  
 13 there?  
 14 A. It was mostly comments from other people  
 15 warning me of him.  
 16 Q. Do you recall any of those comments,  
 17 specifically?  
 18 A. Yes.  
 19 Q. Okay. Tell me what you recall.  
 20 A. It was Tony Lima. He and I were talking  
 21 about the school. And I told him that Chad was now  
 22 working and he started warning me about him.  
 23 Q. Okay. What did Tony say?  
 24 A. He said: Be very careful around him.  
 25 Dangerous. That he is involved with things that I

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1 probably don't want to be involved in and just  
 2 extensive warning to be careful around him.  
 3 Q. Any specific things that he said he was  
 4 involved with?  
 5 A. Things that I wouldn't want to be  
 6 involved with is how he left it.  
 7 Q. That's how he put it?  
 8 A. Yes.  
 9 Q. He didn't tell you what those things  
 10 were?  
 11 A. No.  
 12 Q. Okay. Anything else? He said he was  
 13 dangerous. Did he say how he was dangerous?  
 14 A. No.  
 15 Q. Okay. Anything else that you can recall  
 16 from that communication with Tony?  
 17 A. No.  
 18 Q. Okay. Your "red flag" comment here, did  
 19 it refer to anything else besides your communication  
 20 with Tony Lima?  
 21 A. Yes.  
 22 Q. Okay. What else?  
 23 A. Rod Furniss reached out to me.  
 24 Q. Okay. Rod contacted you?  
 25 A. Uh-huh.

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1 Q. Do you recall when Rod contacted you?  
 2 A. I could have contacted him. He could  
 3 have contacted me.  
 4 Q. Okay. Do you recall when Tony contacted  
 5 you or when you had the communication with Tony?  
 6 A. It would have been shortly between this  
 7 conversation and October 1st.  
 8 Q. So after October 1st --  
 9 A. Yes.  
 10 Q. -- and before October 19th?  
 11 A. And Rod's was the same, yes.  
 12 Q. Okay. Was October 1 when you hired  
 13 Chad?  
 14 A. Yes.  
 15 Q. Your communication with Tony, was that  
 16 in person or by phone?  
 17 A. By phone.  
 18 Q. Okay. How about your communication with  
 19 Rod?  
 20 A. By phone.  
 21 Q. To your recollection, did he call you or  
 22 did you call him?  
 23 A. Don't recall.  
 24 Q. Do you recall if it was before or after  
 25 you talked to Tony?

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1 A. Would have been after.  
 2 Q. Okay. And what did -- what did Rod say?  
 3 A. He said he's never had problems with him  
 4 but he's heard a lot of negative things --  
 5 Q. Okay.  
 6 A. -- and told me to be careful. But did  
 7 specify he's never had any problems with Chad.  
 8 Q. Okay. Did he -- did he specify what he  
 9 had heard negative?  
 10 A. I don't recall if it were he or Tony,  
 11 but one of them made comments of him "and women"  
 12 comments, comments about women.  
 13 Q. What specifically did they say about  
 14 women?  
 15 A. That he was not women friendly or too  
 16 women friendly.  
 17 Q. Are those the words they used to the  
 18 best of your recollection or is that your --  
 19 A. No. That would be --  
 20 Q. -- characterization?  
 21 A. -- my interpretation.  
 22 Q. Okay. What was your understanding of  
 23 what they meant by those comments?  
 24 A. I didn't want to clarify. I didn't know  
 25 if he was sexist or if he liked women. I didn't

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1 know. But I could tell it was not -- one of those  
2 two things.  
3 **Q. When you say "liked women," can you**  
4 **describe --**  
5 A. Womanizer.  
6 **Q. Okay. So your conclusion, if I'm**  
7 **understanding correctly, was that whichever one of**  
8 **them said this, Tony or Rod --**  
9 A. Uh-huh.  
10 **Q. -- was suggesting that Chad was either**  
11 **sexist or a womanizer?**  
12 A. Yeah. I didn't want to clarify.  
13 **Q. Okay. Anything else besides your**  
14 **conversations with Tony Lima and Rod Furniss that is**  
15 **reflected in this statement about seeing some red**  
16 **flags?**  
17 A. To this date, besides his political  
18 history, not being insurance friendly, no.  
19 **Q. Okay. So those -- when you say you're**  
20 **seeing some red flags, you are referring specifically**  
21 **to --**  
22 A. Comments.  
23 **Q. -- comments from Tony Lima and Rod**  
24 **Furniss --**  
25 A. Uh-huh.

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1 **Q. -- and then your interpretation of**  
2 **Chad's political position on certain issues?**  
3 A. Yeah. He opposed my car bill, nicknamed  
4 it Obamacar.  
5 **Q. Nicknamed it what?**  
6 A. Obamacar.  
7 **Q. Obamacar.**  
8 **So page 3 then, next page.**  
9 A. Uh-huh.  
10 **Q. About two-thirds of the way down you**  
11 **have got another comment there, another message that**  
12 **says: He just seemed to get aggressive about things**  
13 **that are out of my control as an agent. It's not**  
14 **what I was used to.**  
15 **Can you describe for me what you're**  
16 **talking about there?**  
17 A. It had to probably do with State Farm's  
18 name.  
19 **Q. Okay.**  
20 A. At the beginning of working there, we  
21 had some computer issues, which is frustrating. I  
22 was frustrated with it too.  
23 **Q. Okay.**  
24 A. Very frustrated. State Farm requires a  
25 lot of training.

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1 **Q. Okay. When you say "he seemed to get**  
2 **aggressive," what do you mean?**  
3 A. Frustrated with them.  
4 **Q. Okay.**  
5 A. And I didn't know how to read it because  
6 I didn't know him very well.  
7 **Q. Okay.**  
8 A. Uh-huh.  
9 **Q. So you could perceive his frustration or**  
10 **annoyance --**  
11 A. Uh-huh.  
12 **Q. -- and -- okay.**  
13 A. Can't control computers. Can't control  
14 training.  
15 **Q. Okay.**  
16 A. It was also at that point in time access  
17 to -- before you can get access to quote things, you  
18 have to complete -- and it was taking a lot of time,  
19 more than normal.  
20 **Q. Okay.**  
21 A. A lot longer than normal.  
22 **Q. That first communication with Chad --**  
23 **with Greg on Messenger was on October 19th, do you**  
24 **recall what day that was? If you don't, I --**  
25 A. Excuse me?

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1 **Q. Do you recall what day October 19th was?**  
2 A. Meaning?  
3 **Q. The day of the week.**  
4 A. No.  
5 **Q. Okay. I'm looking here at the calendar.**  
6 **It looks like it was a Monday?**  
7 A. Okay.  
8 **Q. Right before that comment about being**  
9 **aggressive, you had exchanged a -- you had provided**  
10 **Greg your phone number?**  
11 A. Uh-huh.  
12 **Q. And then he says: I'll call in 10.**  
13 **And the next message is from Wednesday?**  
14 A. Uh-huh.  
15 **Q. So did you have a phone conversation**  
16 **with Greg on Monday?**  
17 A. Yes.  
18 **Q. Okay. Is that the conversation that was**  
19 **recorded?**  
20 A. Yes.  
21 **Q. Between the message with your phone**  
22 **number and your actual telephone call with Greg, who**  
23 **did you discuss this with?**  
24 A. I discussed it with Chad.  
25 **Q. Okay. What discussion did you have with**

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1 **Chad?**  
 2 A. I told him that I can't have people  
 3 threatening -- I can't have my employees threatening  
 4 people with guns, and I was going to look into the  
 5 accusations.  
 6 **Q. Okay. Anything else?**  
 7 A. I was on the phone with our school  
 8 lawyer when I briefly out of frustration brought it  
 9 up to him.  
 10 **Q. Okay.**  
 11 A. I texted a friend in Virginia.  
 12 **Q. About this?**  
 13 A. Yeah, I didn't text her. I called her  
 14 really fast. I lied to you.  
 15 **Q. What did you -- what did you discuss**  
 16 **with your friend in Virginia?**  
 17 A. What should I do?  
 18 **Q. Okay. Who is that friend in Virginia?**  
 19 A. Jenny Cozart.  
 20 **Q. So between communication with Greg on**  
 21 **Monday and the phone call you talked to Chad about a**  
 22 **concern about guns and threats?**  
 23 A. Yes. I did.  
 24 **Q. Okay. Any other discussion with Chad at**  
 25 **that point in time?**

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1 A. No.  
 2 **Q. Okay. Did you tell Chad you were going**  
 3 **to call Greg or Greg was going to call you?**  
 4 A. Yes. I did.  
 5 **Q. Okay. What did Chad say about that?**  
 6 A. He -- he wasn't concerned.  
 7 **Q. Okay. Did he say anything?**  
 8 A. Kind of rolled his eyes.  
 9 **Q. Did he say anything about that call at**  
 10 **all besides rolling his eyes?**  
 11 A. He said: He's someone who has hated me  
 12 for a long time politically.  
 13 **Q. Anything else?**  
 14 A. No.  
 15 **Q. Okay. Did he ask you to record the**  
 16 **call?**  
 17 A. No. I told him I was going to record  
 18 the call.  
 19 **Q. Okay. What did he say when you told him**  
 20 **you were going to record the call?**  
 21 A. He didn't seem concerned. I thought he  
 22 would be. Confused me.  
 23 **Q. Okay. Looking again at [Exhibit 4](#), so**  
 24 **this is two days later -- off the record.**  
 25 **(A discussion was held off the record.)**

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1 **Q. BY MR. ALLEN: At the top of page 4, I**  
 2 **think it is?**  
 3 A. Yes.  
 4 **Q. There's a message there with a reference**  
 5 **to Adam and Jennifer. It says: I talked to Adam and**  
 6 **Jennifer.**  
 7 A. Yes.  
 8 **Q. Adam told me the story. Jennifer made**  
 9 **me very concerned.**  
 10 **Adam who?**  
 11 A. Frugoli.  
 12 **Q. Okay. How did you come to have a**  
 13 **conversation with Adam?**  
 14 A. Greg told me to.  
 15 **Q. Okay. So Greg said something --**  
 16 A. Greg Graf. I should specify.  
 17 **Q. So Greg said something in your phone**  
 18 **call --**  
 19 A. Yes.  
 20 **Q. -- that precipitated your conversation**  
 21 **with Adam?**  
 22 A. Uh-huh.  
 23 **Q. Okay. Tell me about your communication**  
 24 **with Adam.**  
 25 A. I reached out to Adam about Chad being a

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1 womanizer and if Adam thought it would be good or bad  
 2 that I worked with Chad.  
 3 **Q. Okay. And what did Adam say?**  
 4 A. He laughed.  
 5 **Q. Okay. What else did he say?**  
 6 A. He said Chad and I working together is  
 7 probably the best combo he's ever heard of.  
 8 **Q. And what did you understand him to mean**  
 9 **by that?**  
 10 A. I was confused.  
 11 **Q. Okay. Did you try to clarify?**  
 12 A. Mr. Graf said that Adam had all of this  
 13 negative thing -- all of these negative things on  
 14 Chad and that Chad was a womanizer and Adam knows me  
 15 pretty well -- not really well, but pretty well, and  
 16 he said Chad and I would be a great combo. I didn't  
 17 think Adam would put me in harm's way if he was a  
 18 womanizer.  
 19 **Q. Okay. Did he say anything else about**  
 20 **any of these accusations that you've said Mr. Graf**  
 21 **made?**  
 22 A. He said that -- now I've got to think.  
 23 You're making me go back.  
 24 He brought up that he had talked to Graf  
 25 about I wanted -- Graf told me to get messages from

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1 him, text messages. I was confused. And he had  
 2 brought up to Graf that he had seen a text message  
 3 about Chad and another woman but didn't have any text  
 4 messages and that since Graf wouldn't denounce Smith  
 5 and Beck that he's been after them. And he  
 6 blackmailed them, basically, is what it sounded like.  
 7 **Q. So Adam told you that he had talked to**  
 8 **Greg Graf --**  
 9 A. Uh-huh.  
 10 **Q. -- about a text message relating to Chad**  
 11 **and another woman?**  
 12 A. Yeah.  
 13 **Q. Did he tell you when he talked to Greg**  
 14 **Graf about that text message?**  
 15 A. It had to have been sometime in the  
 16 election, the primary election.  
 17 **Q. Okay. Did he tell you anything more**  
 18 **about that message?**  
 19 A. He told me it was between Chad and some  
 20 woman. Flirting, it sounded like.  
 21 **Q. Did he tell you who the woman was?**  
 22 A. Yes.  
 23 **Q. Who did he tell you the woman was?**  
 24 A. I don't recall.  
 25 **Q. Okay.**

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1 A. I didn't think it mattered.  
 2 **Q. Okay. Was it just one woman?**  
 3 A. Yes.  
 4 **Q. Okay. Did you know the woman?**  
 5 A. No.  
 6 **Q. Okay. Did he tell you anything else**  
 7 **about that message?**  
 8 A. No.  
 9 **Q. Did he tell you whether or not he had**  
 10 **seen the message?**  
 11 A. Yes.  
 12 **Q. Had he seen it?**  
 13 A. He said he saw a message.  
 14 **Q. Okay. Did he tell you where he had seen**  
 15 **it?**  
 16 A. No.  
 17 **Q. Did he tell you whether or not he had a**  
 18 **copy of it?**  
 19 A. Yes. I asked him.  
 20 **Q. What did he say?**  
 21 A. No, he did not, and he's never had one.  
 22 **Q. Okay. And he did not tell you where he**  
 23 **saw it?**  
 24 A. No. He did not.  
 25 **Q. Okay. Anything else about that**

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1 **conversation you can remember?**  
 2 A. I asked him: Having an office of all  
 3 women, should I be worried about Chad?  
 4 **Q. Okay.**  
 5 A. And he said no. I -- he's told me -- he  
 6 did tell me that he had thought about hiring Chad  
 7 when the Farm Bureau fiasco happened, but he was  
 8 really happy that Chad and I were working together.  
 9 I said we should go to lunch sometime. He said that  
 10 would be nice.  
 11 **Q. Okay. So he had -- he had considered**  
 12 **hiring Chad?**  
 13 A. Yeah.  
 14 **Q. What does Adam do?**  
 15 A. He's an insurance agent. He did say he  
 16 thought it was a smart business move on my end to  
 17 hire him.  
 18 **Q. You referenced a Farm Bureau fiasco.**  
 19 A. Uh-huh.  
 20 **Q. What is the Farm Bureau fiasco?**  
 21 A. I have no -- accusations by Graf about  
 22 Chad being let go for fraud, insurance fraud, and  
 23 that he heard from Stephanie Mickelsen. Chad being  
 24 brought on by Farm Bureau.  
 25 I had talked to Chad about it at a

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1 baseball game because he asked me. I said Farm  
 2 Bureau is a great company. And then Farm Bureau  
 3 letting him go for political reasons or fraud, who  
 4 knows why they let it go. That type of thing.  
 5 **Q. Okay. So Chad was let go by Farm Bureau**  
 6 **at some point in time?**  
 7 A. Yes.  
 8 **Q. Do you know when that happened?**  
 9 A. Before October 1st.  
 10 **Q. And if I understand what you're saying**  
 11 **correctly, you don't know why?**  
 12 A. No. I've heard a lot of rumors.  
 13 **Q. Okay.**  
 14 A. Farm Bureau has never told me.  
 15 **Q. And one of those rumors that you've**  
 16 **heard is that Chad was involved in fraud, and you**  
 17 **heard that from Mr. Graf; is that what I understand?**  
 18 A. Yes, I did.  
 19 **Q. Okay. I just want to clarify. You're**  
 20 **not saying that Mr. Graf got him fired. You're**  
 21 **saying that Mr. Graf told you --**  
 22 A. That's what Mr. Graf told me.  
 23 **Q. -- that his understanding was that he**  
 24 **was fired as a result of some kind of fraud?**  
 25 A. And also clients not wanting to be in

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1 his book of business were his two reasons.  
 2 **Q. Okay. "His two" meaning Mr. Graf's**  
 3 **reasons?**  
 4 A. Yes.  
 5 **Q. Okay. Have you ever asked Chad why he**  
 6 **was fired?**  
 7 A. Yes.  
 8 **Q. What did he say?**  
 9 A. He said he was fired because of his  
 10 political beliefs and he showed me text messages.  
 11 **Q. Who were those text messages from?**  
 12 A. His direct -- the person who hired him  
 13 or direct report at Farm Bureau. I don't know.  
 14 **Q. His direct supervisor?**  
 15 A. Yeah.  
 16 **Q. Why did he show you those texts?**  
 17 A. To show that it wasn't for the reasons  
 18 Mr. Graf said.  
 19 **Q. Okay. What did those texts say?**  
 20 A. It was -- it said that it was about some  
 21 meeting they were going to have after he went to  
 22 northern Idaho for -- to sing songs or something.  
 23 **Q. So the text related to a meeting that**  
 24 **Chad was going to have with his supervisor?**  
 25 A. And some other gentleman.

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1 **Q. Okay. Was that before or after he was**  
 2 **let go?**  
 3 A. It was before.  
 4 **Q. Okay. Do you recall anything else about**  
 5 **what those text messages said?**  
 6 A. No.  
 7 **Q. Did Chad tell you anything about what**  
 8 **the meeting was about?**  
 9 A. They let him go.  
 10 **Q. Okay. So the texts were to --**  
 11 A. Uh-huh.  
 12 **Q. -- schedule the meeting when he was**  
 13 **going to be let go?**  
 14 A. Uh-huh.  
 15 **Q. Okay. Did he tell you anything else**  
 16 **about why he was let go?**  
 17 A. He said he was let go because of his  
 18 political affiliation.  
 19 **Q. Did he explain what he meant by that?**  
 20 A. No.  
 21 **Q. Do you have any understanding of what he**  
 22 **meant by that?**  
 23 A. They didn't like his political beliefs.  
 24 **Q. Okay. Did he say anything about what**  
 25 **political beliefs specifically they had an issue**

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1 **with?**  
 2 A. Something happened in northern Idaho the  
 3 weekend before.  
 4 **Q. Do you have any idea of what that was**  
 5 **that happened in northern Idaho?**  
 6 A. All I know was that there were hymns  
 7 being sung. I don't recall the rest.  
 8 **Q. So there was some kind of event or**  
 9 **occurrence --**  
 10 A. Uh-huh.  
 11 **Q. -- in northern Idaho?**  
 12 A. Yeah.  
 13 **Q. I think your message said something**  
 14 **about a meeting after -- I think you said after he**  
 15 **returned from northern Idaho. Was that Chad**  
 16 **returning from northern Idaho?**  
 17 A. Uh-huh. Yes.  
 18 **Q. Not the supervisor?**  
 19 A. Yes.  
 20 **Q. Okay. All right. Anything else that**  
 21 **you can recall from that discussion with Chad?**  
 22 A. No.  
 23 **Q. Okay.**  
 24 A. He had mentioned Stephanie Mickelsen.  
 25 Sorry.

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1 **Q. Chad mentioned Stephanie Mickelsen?**  
 2 A. Uh-huh.  
 3 **Q. What did he said about Stephanie**  
 4 **Mickelsen?**  
 5 A. That she didn't like him.  
 6 **Q. Okay. Anything else?**  
 7 A. That she's kind of been after him and he  
 8 didn't know why.  
 9 **Q. Did he suggest that Stephanie was behind**  
 10 **his getting fired?**  
 11 A. Yes. Not to me but on Facebook I read  
 12 it.  
 13 **Q. Okay. So he didn't tell you that. You**  
 14 **just saw it -- saw that somewhere on Facebook?**  
 15 A. Uh-huh.  
 16 **Q. Was that a post that he had made on**  
 17 **Facebook?**  
 18 A. Yeah.  
 19 **Q. Okay. All right. Your next -- well,**  
 20 **it's actually the same message. You reference**  
 21 **Jennifer. Who is Jennifer?**  
 22 A. Jennifer Ellis.  
 23 **Q. Okay. So you had a conversation with**  
 24 **Jennifer Ellis?**  
 25 A. Yes.

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1 **Q. When did that conversation take place?**  
 2 A. I believe it was the day after I spoke  
 3 to Mr. Graf.  
 4 **Q. Okay.**  
 5 A. I could not -- I don't recall  
 6 completely. But a day, day or two.  
 7 **Q. Okay. Was that by phone?**  
 8 A. Yes.  
 9 **Q. Did you record your communication with**  
 10 **Adam, your conversation with Adam?**  
 11 A. No.  
 12 **Q. Did you record your conversation with**  
 13 **Jennifer?**  
 14 A. No.  
 15 **Q. Tell me about your conversation with**  
 16 **Jennifer.**  
 17 A. I told her I didn't want to have this  
 18 conversation while I was at work. She said: It's  
 19 okay. They knew Chad wasn't at work at my office  
 20 that day. I don't know how they knew. It was a  
 21 little creepy. She recounted the stories that  
 22 Mr. Graf said but not as negative. She told me when  
 23 she first met Chad with his wife and how she didn't  
 24 have a good, warm feeling around him. She said she  
 25 was uncomfortable as a woman being around him. She

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1 mentioned militia groups. I believe she mentioned  
 2 the person that Chad beat -- I don't recall his name  
 3 though -- when he first ran.  
 4 **Q. Okay. Anything else?**  
 5 A. There was a lot but from what I recall,  
 6 that was about it.  
 7 **Q. Okay. In his next -- in his next**  
 8 **communication back to you, Greg asked the**  
 9 **questions -- excuse me, the question: Did Jen give**  
 10 **you the idea about requiring masks at your office and**  
 11 **no guns at work policy?**  
 12 A. No.  
 13 **Q. Jen did not --**  
 14 A. No.  
 15 **Q. -- communicate that idea to you?**  
 16 A. But can we go back to the prior  
 17 question?  
 18 **Q. Sure.**  
 19 A. I am so sorry. I forgot about this  
 20 part. She explained where they gave him the nickname  
 21 Maxi Chad or what is it? I don't know what the  
 22 nickname is that they gave him. It was quite  
 23 degrading, in my opinion. And she said she had a  
 24 whole file she was going to send me. I'm so sorry.  
 25 I did forget about that.

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1 **Q. Did she send you the file?**  
 2 A. No.  
 3 **Q. Did you ever have any follow-up**  
 4 **communication with her after that?**  
 5 A. No.  
 6 **Q. Okay.**  
 7 A. And then to the next question about the  
 8 guns, no, she did not discuss that with me.  
 9 **Q. Okay. First comment on the next page.**  
 10 **You say: Last night I had to work on school board**  
 11 **items. I was there until almost 9:00. I had a lot**  
 12 **to work on. He was there the whole time. Maybe I'm**  
 13 **just paranoid.**  
 14 A. Yes.  
 15 **Q. What are you talking about there?**  
 16 A. Chad stayed the whole time.  
 17 **Q. Okay. What did you mean by "maybe I'm**  
 18 **just paranoid"?**  
 19 A. I didn't know why he stayed the whole  
 20 time.  
 21 **Q. Okay.**  
 22 A. And I didn't know why -- I work alone a  
 23 lot at night.  
 24 **Q. Is there a reason why you're sharing**  
 25 **that with Mr. Graf?**

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1 A. Because that was -- I didn't know if  
 2 that was a red flag or not. I didn't know if I was  
 3 being paranoid about it.  
 4 **Q. Okay. So if I'm understanding you, at**  
 5 **this point in time in your communication with**  
 6 **Mr. Graf, you are at least on some level still**  
 7 **concerned?**  
 8 A. Yes. I was.  
 9 **Q. And you're still pursuing information**  
 10 **related to whether or not having Chad in your office**  
 11 **is a good idea?**  
 12 A. Yeah.  
 13 **Q. Okay. Go to the -- I can't tell what**  
 14 **page number I'm on. Go to page 7 --**  
 15 A. Yes.  
 16 **Q. -- of your exhibit.**  
 17 A. Looks like the very top.  
 18 **Q. It starts with: Cool. I really like**  
 19 **him.**  
 20 A. Yes. Uh-huh.  
 21 **Q. It looks like "I really like him" is a**  
 22 **reference to Vernon Summers or is it a reference to**  
 23 **Mike Simpson? I can't tell for sure.**  
 24 A. It would have been Mike Simpson. He's  
 25 very polite when I've been to D.C. to visit him.

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1 Q. Have you ever discussed the messages  
2 that Adam talked to you about with Chad?  
3 A. Yes.  
4 Q. What did Chad say about those messages?  
5 A. He said that he liked the person and she  
6 liked him. And it didn't go anywhere from there.  
7 Q. Okay. Do you know if he was married at  
8 the time?  
9 A. He was not, I recall. That I recall,  
10 no. But I don't recall. Didn't ask him.  
11 Q. Is Chad married right now?  
12 A. No. Not that I know of.  
13 Q. Okay. Do you know how long he's been  
14 single?  
15 A. He told me at the time. I don't -- like  
16 a year and a half maybe, two years.  
17 Q. Okay. Have you met his ex-wife?  
18 A. No.  
19 Q. Okay. Is she the mother of the son that  
20 plays ball with your son?  
21 A. No. She's not.  
22 Q. Okay. Have you met the son's mother  
23 that plays ball with your son?  
24 A. Yes.  
25 Q. What's her name?

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1 A. I don't recall.  
2 Q. Okay.  
3 A. I'm not great with names.  
4 Q. Were she and Chad married when they had  
5 their son?  
6 A. I don't believe they were.  
7 Q. Okay. Do you know how many times Chad's  
8 been married?  
9 A. I believe twice.  
10 Q. Okay. Do you know either of his -- have  
11 you met either of his wives?  
12 A. No. I have not.  
13 Q. Okay. All right. Let's go to page 8,  
14 top of the next page, sorry.  
15 A. Uh-huh.  
16 Q. The first message at the top of the next  
17 page. It says: Okay. No, her won't?  
18 A. It's probably "he." I shouldn't type on  
19 my phone.  
20 Q. He told me what they were though. I'll  
21 go for the mask/gun thing. Thanks, I wouldn't have  
22 thought of it. Second or third sentence there: He  
23 told me what they were though.  
24 What's that in reference to?  
25 A. The what?

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1 Q. He told me what they were though. What  
2 is he talking -- what are you talking about there?  
3 A. Oh, the images from Adam.  
4 Q. Okay. What did Chad tell you those  
5 images were?  
6 A. I didn't ask Chad. He didn't know about  
7 them.  
8 Q. So when you say "he told me what they  
9 were though," you mean Adam told you what they were?  
10 A. Uh-huh.  
11 Q. Okay. Gotcha. And "I'll go for the  
12 mask/gun thing," what does that mean?  
13 A. They told me to say -- not have guns and  
14 masks.  
15 Q. Who told you that?  
16 A. Greg.  
17 Q. Why did Greg tell you that?  
18 A. I don't know. Greg Graf. I should use  
19 last names.  
20 Q. So Greg Graf told you to not have guns  
21 and masks?  
22 A. Yeah.  
23 Q. And you don't know why he told you that?  
24 A. To get rid of Chad is what he said. Why  
25 he really told me, I don't know.

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1 Q. At the point in time that Greg said  
2 that, were you still concerned?  
3 A. I was -- after I talked to Adam, I  
4 wasn't as concerned.  
5 Q. Okay.  
6 A. Adam wouldn't put me in harm's way. I  
7 trust that.  
8 Q. But you told Greg that you would go with  
9 the mask/gun thing. What were you trying to convey  
10 to him?  
11 A. I didn't know what to do at that point.  
12 I was really confused.  
13 Q. Okay. Flip back three pages. Your long  
14 message there in the middle, starting in the middle  
15 of the page. You say: Okay. I want to share this  
16 but please don't tell anyone. My office has always  
17 been a safe place for women.  
18 A. Uh-huh.  
19 Q. One of my employees had to move out  
20 while her husband was at work because the abuse was  
21 so bad. I have another woman in my office who was  
22 sexually assaulted. I've always kept women safe.  
23 Now I feel like the very thing I've protected them  
24 from I've brought into the office.  
25 A. Yes.

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1 Q. Is that a reference to Chad?  
 2 A. And accusations that were made --  
 3 Q. Okay.  
 4 A. -- between he and Jennifer.  
 5 Q. So at least at this point in time, you  
 6 are communicating to Mr. Graf that you have concerns  
 7 about Chad being --  
 8 A. Yes.  
 9 Q. -- in the office?  
 10 A. Uh-huh.  
 11 MR. ALLEN: Okay. All right. I think that's  
 12 probably all of the questions that I have about  
 13 [Exhibit 4](#) and this is probably a good time to take a  
 14 break.  
 15 (A recess was taken from 11:03 a.m. to  
 16 11:19 a.m.)  
 17 MR. ALLEN: Back on the record.  
 18 Q. BY MR. ALLEN: All right. We talked  
 19 about conversations that you had with Tony Lima and  
 20 Rod Furniss back when you hired Chad. Have you had  
 21 any subsequent conversations with either Tony or Rod?  
 22 A. Yes.  
 23 Q. Okay. When have you talked with Tony  
 24 and Rod?  
 25 A. I talked to Tony shortly either before

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1 or after I talked to Adam.  
 2 Q. Okay.  
 3 A. After Graf told me to.  
 4 Q. Okay.  
 5 A. After that first conversation.  
 6 Q. Okay. Tell me about that conversation.  
 7 A. I asked if he knew him.  
 8 Q. Okay.  
 9 A. And he said he was a really good friend.  
 10 Q. You asked Tony if he knew Greg?  
 11 A. Yes.  
 12 Q. Okay. Any other -- any other discussion  
 13 with Tony at that time?  
 14 A. I don't recall.  
 15 Q. Okay. And what about Rod?  
 16 A. Rod, I told him an article was coming  
 17 out.  
 18 Q. Okay.  
 19 A. Because his name was mentioned.  
 20 Q. How did you become aware that the  
 21 article was coming out?  
 22 A. Chad told me.  
 23 Q. Okay. Do you recall when Chad told you?  
 24 A. Sometime around my first conversation  
 25 that I had with Pruett.

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1 Q. Okay. Do you recall what Chad said?  
 2 A. No.  
 3 Q. Okay. Do you recall at all what you  
 4 said to him?  
 5 A. Yes. I was worried about who all had  
 6 heard the recording.  
 7 Q. Did you ask?  
 8 A. Probably. If not that time, another.  
 9 Q. Do you recall what you were told?  
 10 A. No. I was probably told it got out. A  
 11 lot of people have.  
 12 Q. Okay.  
 13 A. Anxiety hit me.  
 14 Q. This is probably as good of time as any.  
 15 I'm going play a little bit of the recording because  
 16 I have some questions about the beginning of the  
 17 recording.  
 18 (An audio recording was played.)  
 19 MR. ALLEN: Let's plan to make the recording  
 20 [Exhibit 13](#).  
 21 ([Exhibit 13](#) marked.)  
 22 MR. ALLEN: And I will get a copy to you.  
 23 Q. BY MR. ALLEN: Can you tell me where you  
 24 were as you started the recording?  
 25 A. I believe I was at Bank of Commerce on

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1 Northgate Mile going through the drive-through.  
 2 Pretty good.  
 3 Q. Does Obamacar somehow play into this  
 4 driving while multitasking?  
 5 (An audio recording was played.)  
 6 Q. BY MR. ALLEN: Whose voice is that?  
 7 A. It's Chad's.  
 8 Q. Okay. Can you tell what he said there?  
 9 A. Play it again.  
 10 (An audio recording was played.)  
 11 THE WITNESS: I have no clue what he says.  
 12 Q. BY MR. ALLEN: All right. So you said:  
 13 This time kept it on record.  
 14 Do you know what you are referring to  
 15 when you said "this time"; was there another time  
 16 that you recorded something?  
 17 A. Yeah, I told him I was going to record  
 18 the conversation when I went down to talk to him.  
 19 Q. Okay.  
 20 A. And he says: How are you doing that?  
 21 Q. Okay.  
 22 A. And I said: I don't know yet.  
 23 Q. Okay.  
 24 A. And I knew he did PI work. I said: How  
 25 do you do it?



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1 Q. Okay. What did he tell you?  
 2 A. He wasn't concerned about me recording  
 3 it.  
 4 Q. But did he tell you --  
 5 A. No. He just said there's apps.  
 6 Q. -- how he did it? Okay.  
 7 A. No. He said there's apps.  
 8 Q. Okay.  
 9 A. So he showed me how to work an app.  
 10 Q. Okay. Do you recall what the app was?  
 11 A. Yeah, I still have it on my phone.  
 12 Q. There's an app for that.  
 13 A. TapeACall Pro.  
 14 Q. Say that again?  
 15 A. TapeACall Pro.  
 16 Q. Did you have that app before you talked  
 17 to Chad?  
 18 A. No. I didn't know it existed.  
 19 Q. Is that the app that you used?  
 20 A. Yes.  
 21 Q. So sometime between communicating with  
 22 Chad and the call with Mr. Graf, you downloaded that  
 23 app?  
 24 A. Yeah.  
 25 Q. Okay. Just trying to get a time frame.

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1 (An audio recording was played.)  
 2 Q. BY MR. ALLEN: Okay. Whose voice was  
 3 that?  
 4 A. Greg Graf's.  
 5 Q. I don't think so. Let's back that up  
 6 and let's let it play for a second.  
 7 A. Was it the bank?  
 8 Q. Okay. So there's that little voice and  
 9 then that silence for a minute and then you can hear  
 10 the conversation with Greg start up. Do you know who  
 11 that was?  
 12 A. It could have been the guy at the teller  
 13 of the bank but I thought it was Greg.  
 14 Q. Okay.  
 15 A. No one else was with me.  
 16 Q. Okay. You were in your car?  
 17 A. Uh-huh.  
 18 Q. And you were alone?  
 19 A. Yeah.  
 20 Q. All right. Okay. Where is your office  
 21 located?  
 22 A. 780 North Holmes Avenue.  
 23 Q. Where is that at? 780?  
 24 A. If you have the golf course and you come  
 25 down that hill, I'm at the very base of that hill.

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1 Q. The golf course, Pinecrest?  
 2 A. Yeah.  
 3 Q. Is that an office building there? Is it  
 4 a converted home? What kind of -- what kind of  
 5 structure is it?  
 6 A. It's an office building. I assume at  
 7 one point it was probably a home.  
 8 Q. Okay. And you said that -- you said  
 9 that Chad was in the basement?  
 10 A. Yeah.  
 11 Q. Okay. Is that just office space in the  
 12 basement --  
 13 A. Yes.  
 14 Q. -- and office space upstairs? His  
 15 happens to be in the basement?  
 16 A. Yeah.  
 17 Q. Aside from the conversation you just  
 18 described with Chad before you made the recording,  
 19 did you discuss recording your conversation with Greg  
 20 with anybody else?  
 21 A. My friend Jenny.  
 22 Q. Okay. What did you and Jenny discuss  
 23 about making a recording?  
 24 A. She said it would be a good idea.  
 25 Q. Okay. What was it at the time about

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1 your communication with Greg that caused you to think  
 2 recording his conversation would be a good idea but  
 3 you didn't record any of the others?  
 4 A. Because he claimed my employee  
 5 threatened him with a gun.  
 6 Q. Okay.  
 7 A. I was concerned.  
 8 Q. So it was just Greg's comment on  
 9 Facebook about Chad and Eric Parker bringing guns to  
 10 the courthouse that precipitated your --  
 11 A. That's not what was said.  
 12 Q. Okay.  
 13 A. It was specifically --  
 14 Q. Do you have that comment that Greg  
 15 posted?  
 16 A. I probably do.  
 17 Q. Okay. Do you know why you deleted your  
 18 comments?  
 19 A. I was creeped out.  
 20 Q. What do you mean by that?  
 21 A. The whole thing was creepy. I didn't  
 22 want to be involved in it. The conversation, it was  
 23 creepy. Didn't feel good about it.  
 24 Q. So why did you reach out to Greg the  
 25 next day -- actually, the same day, on Messenger?

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1 A. I don't recall I did.  
 2 **Q. Well, I think it was your testimony that**  
 3 **within 30 minutes after those comments on Facebook**  
 4 **you reached out to him on Messenger.**  
 5 A. Oh, that day?  
 6 **Q. Yeah.**  
 7 A. Oh, I thought you said the next day.  
 8 I'm so sorry.  
 9 **Q. No.**  
 10 A. Oh, that day.  
 11 **Q. You're saying that you deleted the**  
 12 **comments because you were creeped out. When -- I**  
 13 **guess maybe the better question is: When did you**  
 14 **delete the comments?**  
 15 A. Within a few days.  
 16 **Q. Okay. Your conversation with Chad**  
 17 **before making the recording, you said you went down**  
 18 **to the basement and talked to him. Was anybody else**  
 19 **present there?**  
 20 A. No.  
 21 **Q. Okay. And we were talking about your**  
 22 **friend Jenny. What did you and Jenny discuss about**  
 23 **making this recording?**  
 24 A. I had talked to her before but I --  
 25 about hiring Chad and I said I got a weird message

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1 that Chad had threatened this gentleman with a gun.  
 2 **Q. Okay. And what else?**  
 3 A. She said: That's weird.  
 4 **Q. Okay.**  
 5 A. And she said: I'd record it.  
 6 **Q. So she suggested that you should record**  
 7 **it?**  
 8 A. Yes.  
 9 **Q. Is that when you decided to record it?**  
 10 A. Yes.  
 11 **Q. Okay. After you made the recording, did**  
 12 **you let anyone else listen to it?**  
 13 A. After?  
 14 **Q. Yeah.**  
 15 A. Yes.  
 16 **Q. So you made the recording. Who did you**  
 17 **let listen to it?**  
 18 A. I let Chad listen to it.  
 19 **Q. Okay. When did you let Chad listen to**  
 20 **it?**  
 21 A. I believe it was two days later. Maybe  
 22 three. I don't recall for sure.  
 23 **Q. Did you make -- I just want to make sure**  
 24 **I have a clear record here, that I'm clear on it.**  
 25 **Your communication on Messenger with Greg Graf**

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1 **started on October 19th?**  
 2 A. Yes.  
 3 **Q. Was the phone call that same day?**  
 4 A. Yes.  
 5 **Q. Okay. Did you discuss it with Chad**  
 6 **after the phone call?**  
 7 A. After the phone call?  
 8 **Q. Right. That's --**  
 9 A. Yes.  
 10 **Q. You had a phone conversation with Greg.**  
 11 **What did you do after the phone conversation? Did**  
 12 **you go back to the office?**  
 13 A. And worked on things, yes.  
 14 **Q. Okay. Did you discuss the phone**  
 15 **conversation with Chad that day?**  
 16 A. Yes. He asked me how it was.  
 17 **Q. Okay. What did you tell him?**  
 18 A. It was weird.  
 19 **Q. Okay. What else?**  
 20 A. That I was supposed to talk to Adam.  
 21 **Q. Okay. Anything else?**  
 22 A. Not very much.  
 23 **Q. Did you tell him what Greg had said?**  
 24 A. Not very much, no.  
 25 **Q. Okay. Did you at that point in time let**

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1 **Chad listen to it?**  
 2 A. No.  
 3 **Q. Did you discuss it with anybody else**  
 4 **that day, the 19th?**  
 5 A. Adam.  
 6 **Q. Okay. So you discussed the phone**  
 7 **conversation with Greg. Did you tell Adam that you**  
 8 **had recorded the conversation with Greg?**  
 9 A. No, I did not.  
 10 **Q. So you presumably did not share the**  
 11 **recording with Adam?**  
 12 A. No. I did not share it with Adam.  
 13 **Q. Did you discuss it with anybody else**  
 14 **besides Chad and Adam?**  
 15 A. Tony.  
 16 **Q. You discussed it with Tony that day?**  
 17 A. I don't recall. It was either that day  
 18 or the following morning.  
 19 **Q. Okay. And what did Tony say?**  
 20 A. We discussed that earlier, that he and  
 21 Greg are good friends.  
 22 **Q. Okay. What did you tell Tony about the**  
 23 **conversation?**  
 24 A. I asked him if he knew it. I had  
 25 someone reach out to me about Chad. I told him his

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1 name.  
 2 **Q. Okay.**  
 3 A. And he says: Yeah, I do know him. He's  
 4 a really good friend of mine.  
 5 **Q. Okay.**  
 6 A. One of my best friends, I believe he  
 7 said.  
 8 **Q. And you told him you had a phone**  
 9 **conversation with Greg?**  
 10 A. Uh-huh.  
 11 **Q. Did you tell him you recorded the**  
 12 **conversation?**  
 13 A. No, I did not.  
 14 **Q. Did you discuss the conversation with**  
 15 **anybody else at that point in time?**  
 16 A. Not at that point in time. I might have  
 17 discussed it with the women who work in my office.  
 18 **Q. Okay. Do you specifically recall**  
 19 **discussing it with anyone on your staff?**  
 20 A. I discussed it with everyone on my  
 21 staff.  
 22 **Q. Okay. The same day that you made the**  
 23 **recording or at a later time?**  
 24 A. Later time.  
 25 **Q. How much later?**

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1 A. A day or two.  
 2 **Q. How many people are on your staff?**  
 3 A. I discussed it with Rebecca and I  
 4 discussed it with Danell. I did not discuss it with  
 5 Brayden, because he is autistic.  
 6 **Q. Okay. What is Rebecca's last name?**  
 7 A. Freund.  
 8 **Q. Can you spell that for the reporter?**  
 9 A. F-r-e-u-n-d.  
 10 **Q. And we've already talked about Danell.**  
 11 **Anybody else worked for you there that you talked to**  
 12 **about it?**  
 13 A. No.  
 14 **Q. Okay.**  
 15 A. I didn't discuss it with Tammy.  
 16 **Q. Who is Tammy?**  
 17 A. My other employee.  
 18 **Q. Do you recall what you and Danell**  
 19 **discussed about it?**  
 20 A. I asked them how they felt around Chad.  
 21 **Q. Okay. And did that conversation --**  
 22 A. Danell and Rebecca trained him.  
 23 **Q. Okay.**  
 24 A. So I asked them: Any red flags? How do  
 25 you feel around him?

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1 **Q. And that's a conversation you had with**  
 2 **both of them?**  
 3 A. Yes.  
 4 **Q. Was that conversation both of them**  
 5 **together or two independent conversations?**  
 6 A. No. It was both of them together.  
 7 **Q. Okay. And then you said you shared the**  
 8 **recording with Chad two days later?**  
 9 A. Uh-huh.  
 10 **Q. Did you share it with anybody else at**  
 11 **that point in time?**  
 12 A. No. I did not.  
 13 **Q. Okay. Did you give Chad a copy of it?**  
 14 A. Yes, I e-mailed it to him.  
 15 **Q. Okay. Is there a reason you didn't**  
 16 **bring a copy of that e-mail with you today?**  
 17 A. Because I didn't think of it.  
 18 **Q. Okay.**  
 19 A. Would you like a copy of it?  
 20 **Q. I would like a copy of it, please.**  
 21 **Are there any other e-mails between you**  
 22 **and Chad related to the recording or related to**  
 23 **Mr. Graf that you didn't think of?**  
 24 A. No. That would have been the only one.  
 25 I don't typically e-mail him.

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1 **Q. Okay. I'll ask you to get a copy of**  
 2 **that to Mr. Smith and he can provide it to me. But**  
 3 **while we're sitting here since you have your --**  
 4 A. Uh-huh.  
 5 **Q. -- handheld super computer, would you**  
 6 **mind checking and seeing what date that recording was**  
 7 **e-mailed to Chad?**  
 8 A. Yes. Definitely.  
 9 It would be easier if I knew his e-mail  
 10 address. Does anybody have it?  
 11 **MR. DINDINGER:** Yeah, it's seilegal@gmail.  
 12 **THE WITNESS:** Thank you. I forget.  
 13 Sorry, I have a lot of e-mails and it  
 14 won't let me search with my sent folder.  
 15 I don't have an e-mail to him.  
 16 **Q. BY MR. ALLEN: Okay.**  
 17 A. I don't know if I sent it to his deleted  
 18 Facebook during that time but I do not have an  
 19 e-mail. The only e-mail correspondence I have to him  
 20 during that time is a trophy club, something about  
 21 trophy club training. And it's a training that I  
 22 signed him up for for work.  
 23 **Q. Okay. But it's your testimony that you**  
 24 **provided --**  
 25 A. I did provide.

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1 Q. -- a copy of the recording to Chad?  
 2 A. I thought I e-mailed it. I must not  
 3 have. I apologize.  
 4 Q. No, that's okay. And do I understand  
 5 you correctly that you have not provided a copy of  
 6 that recording to anyone other than Chad?  
 7 A. That is incorrect.  
 8 Q. That is incorrect. Okay.  
 9 A. I provided it to one other person.  
 10 Q. Okay. Who else did you provide a copy  
 11 of the recording to?  
 12 A. I gave it to Katie Hart.  
 13 Q. Okay. When did you give a copy to Katie  
 14 Hart?  
 15 A. I gave a copy to Katie Hart on the 30th  
 16 of October.  
 17 Q. Did you know Katie Hart?  
 18 A. Yes. I do.  
 19 Q. Okay. How do you know Katie?  
 20 A. We are in the same neighborhood.  
 21 Q. Okay. And why did you decide to give a  
 22 copy to Katie?  
 23 A. Because I felt that it would be nice if  
 24 she had a prior warning. She asked me for it. She  
 25 said: Can I have a copy of that?

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1 Q. Okay. How did she know about it?  
 2 A. Because an article was coming out and I  
 3 told her about it.  
 4 Q. Okay. So you heard about the article  
 5 and you told Katie the article was coming out?  
 6 A. Yes. I did.  
 7 Q. All right. And then she asked you for a  
 8 copy of the recording?  
 9 A. Yeah.  
 10 Q. And you provided it to her?  
 11 A. Uh-huh.  
 12 Q. Anybody else?  
 13 A. No. Those are the only two.  
 14 Q. Chad and Katie?  
 15 A. Uh-huh.  
 16 Q. Did you discuss the making of the  
 17 recording with Katie?  
 18 A. No.  
 19 Q. Okay.  
 20 A. Besides she knew I had it.  
 21 Q. Okay. Did she ask you about how you  
 22 came to have it or anything like that?  
 23 A. I'm --  
 24 Q. Did she ask you about creating the  
 25 recording?

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1 A. No. I told her.  
 2 Q. Okay. You just told her that you had  
 3 had a conversation and you recorded it?  
 4 A. Yes.  
 5 Q. Did she ask you about the substance of  
 6 the recording?  
 7 A. No.  
 8 Q. Did you discuss it at all with her?  
 9 A. Not really, no.  
 10 Q. You just gave it to her and said --  
 11 A. Knock yourself out.  
 12 Q. Here you go. Do with it what you will?  
 13 A. Yeah.  
 14 Q. Okay. Did you discuss the recording  
 15 with Greg Pruett?  
 16 A. The recording? Yes.  
 17 Q. Yes. Okay. What was your conversation  
 18 with Greg Pruett about the recording?  
 19 A. I didn't want names used.  
 20 Q. Okay. Anything else?  
 21 A. I didn't want him to use it. I didn't  
 22 give him permission to use it.  
 23 Q. Okay. You told him you didn't want him  
 24 to use it?  
 25 A. In a text, yeah.

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1 Q. Okay. And you told him you didn't want  
 2 names used?  
 3 A. Uh-huh.  
 4 Q. Did you specify names? I seem to recall  
 5 in those messages he said something about not  
 6 realizing --  
 7 A. They had --  
 8 Q. -- Tony Lima's was a name you wanted  
 9 left out. Did you discuss specific names with him?  
 10 A. Yeah. I said: You told me no names.  
 11 Q. Okay.  
 12 A. No names.  
 13 Q. Okay. Any other discussion you had with  
 14 Greg about it?  
 15 A. Yes.  
 16 Q. Besides just asking him not to  
 17 use names.  
 18 A. The recording specifically?  
 19 Q. Yeah.  
 20 A. Nope. That was it.  
 21 Q. Okay. Any other discussion about Greg  
 22 Graf with Greg Pruett?  
 23 A. Yes.  
 24 Q. Okay. What did you discuss with Greg  
 25 Pruett?

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1 A. That Greg Graf had a vendetta against  
2 many people.  
3 **Q. Okay. Is that --**  
4 A. That he's not very nice.  
5 **Q. Is that what you said or is that what**  
6 **Mr. Pruett said?**  
7 A. That's what Mr. Pruett said.  
8 **Q. Okay. Did he say anything else?**  
9 A. That he's a bully.  
10 **Q. Okay. Anything else?**  
11 A. No.  
12 **Q. And did you say anything to him about**  
13 **Greg Graf?**  
14 A. I said the whole conversation creeped me  
15 out.  
16 **Q. Okay.**  
17 A. I said I didn't feel good about it.  
18 **Q. Okay. I think you said you didn't know**  
19 **Dustin Hurst; is that right?**  
20 A. No. I do not.  
21 **Q. Okay. Did you discuss the recording**  
22 **with Tony?**  
23 A. No.  
24 **Q. Did you -- have you ever discussed the**  
25 **recording with Tony?**

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1 A. Not that I recall.  
2 **Q. Okay. Have you discussed the recording**  
3 **with Rod Furniss?**  
4 A. Yes.  
5 **Q. Okay. When did you discuss the**  
6 **recording with Rod?**  
7 A. When I told him that an article was  
8 coming out.  
9 **Q. Okay. So you called him to warn him**  
10 **that --**  
11 A. Yes.  
12 **Q. -- the article was coming out? Okay.**  
13 **Presumably that conversation would have taken place**  
14 **in late October then as well?**  
15 A. Yes.  
16 **Q. Okay. What did you tell Rod?**  
17 A. I told him about a conversation and  
18 because of warnings I was concerned and I recorded  
19 it. Some people got a recording and they were doing  
20 the article.  
21 **Q. Okay. Anything else?**  
22 A. Not really.  
23 **Q. Okay. What did Rod say in response?**  
24 A. He said that he really just didn't want  
25 to be involved.

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1 I said: Neither do I --  
2 **Q. Okay.**  
3 A. -- I just thought it was a professional  
4 courtesy to let you know.  
5 And he said thank you.  
6 **Q. And that was the extent of the**  
7 **conversation?**  
8 A. That was the extent, uh-huh.  
9 **Q. Okay. Have you ever discussed the**  
10 **recording with Neal Larsen?**  
11 A. No. Who is Neal Larsen?  
12 **Q. He is a radio host.**  
13 A. Oh. No. I've never discussed it with  
14 him.  
15 **Q. Okay. Have you ever discussed it with**  
16 **Stephanie Lucas?**  
17 A. Yes.  
18 **Q. Okay. When did you discuss it with**  
19 **Stephanie Lucas?**  
20 A. She said that Fox News wanted to do  
21 something on it.  
22 **Q. She contacted you?**  
23 A. Yes.  
24 **Q. When was that contact?**  
25 A. I have no clue. After she did her radio

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1 thing.  
2 **Q. She called you?**  
3 A. Yes. No, she came into my office. I am  
4 sorry. She came into my office.  
5 **Q. And that was after her radio story?**  
6 A. Yes.  
7 **Q. To your knowledge had she heard the**  
8 **recording?**  
9 A. Yes.  
10 **Q. Okay. And she told you Fox News wanted**  
11 **to do a story?**  
12 A. Uh-huh.  
13 **MR. SMITH:** Is that a yes?  
14 **THE WITNESS:** Yes. Oh. You've got to check  
15 me. I'm getting lazy.  
16 **Q. BY MR. ALLEN: What else did she tell**  
17 **you?**  
18 A. She said that she had seen Greg's truck  
19 outside of her office, what appeared to looked like  
20 his truck.  
21 **Q. Greg Graf's?**  
22 A. Yes.  
23 **Q. How long was Stephanie there?**  
24 A. Ten minutes.  
25 **Q. Okay. Aside from telling you that Fox**

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1 wanted to do a story and that Greg's truck had been  
 2 outside her office, what else did she tell you?  
 3 A. That was about it.  
 4 Q. Okay. Did you discuss anything else  
 5 with her?  
 6 A. No.  
 7 Q. What did you say in response to learning  
 8 that Fox wanted to do a story?  
 9 A. I didn't want to be involved.  
 10 Q. Anything else at all about that  
 11 conversation with Stephanie Lucas that you can  
 12 recall?  
 13 A. Not that I recall.  
 14 Q. Okay. Have you had any interaction or  
 15 communication with her since that time?  
 16 A. Yes.  
 17 Q. Okay. When was your next communication  
 18 with her?  
 19 A. I don't recall.  
 20 Q. Okay. Did it relate to this matter at  
 21 all or the recording?  
 22 A. No.  
 23 Q. Okay. Have you had any discussion that  
 24 did relate to Chad or Greg or Greg Pruett or the  
 25 recording at any time since that conversation?

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1 A. Yes. I have.  
 2 Q. Okay. Do you recall when?  
 3 A. It was -- she had me on her show the  
 4 other day.  
 5 Q. She had you on her show the other day?  
 6 A. Yes. Uh-huh.  
 7 Q. What day was that?  
 8 A. I don't have my calendar in front of me.  
 9 It was last week.  
 10 Q. Okay. What was the reason for being on  
 11 her show?  
 12 A. I was named one of the top 100 people in  
 13 the country for modern governance.  
 14 Q. What does that mean, exactly?  
 15 A. It means that someone nominated me for  
 16 my modern governance and I won.  
 17 Q. Who -- what organization is behind that  
 18 recognition?  
 19 A. I believe it is Diligent and then they  
 20 had a post on it in Business Wire and --  
 21 Q. Is that an insurance industry --  
 22 A. No.  
 23 Q. No. So she had you on about that  
 24 recognition?  
 25 A. Yeah.

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1 Q. Okay. Did you at that time discuss  
 2 Mr. Graf?  
 3 A. No.  
 4 Q. Okay. Did you discuss Chad?  
 5 A. Yes.  
 6 Q. What did you discuss about Chad?  
 7 A. She wants to have Chad and I on the show  
 8 to talk about some political things because she  
 9 thinks our banter together is hilarious and very,  
 10 very good mixture of people.  
 11 Q. Okay.  
 12 A. Uh-huh.  
 13 Q. Did you discuss Greg Pruett with her?  
 14 A. No.  
 15 Q. Did you discuss the recording at all  
 16 with her at that time?  
 17 A. No.  
 18 Q. Have you had any other conversations  
 19 with her since the initial conversation that related  
 20 to Greg or Chad or the recording?  
 21 A. That relates to those things?  
 22 Q. Yes.  
 23 A. No.  
 24 Q. Okay. Have you ever had a conversation  
 25 with Heath Druzin about the recording?

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1 A. About who?  
 2 Q. Heath Druzin?  
 3 A. I don't know who that is.  
 4 Q. He's a reporter.  
 5 A. With what organization?  
 6 Q. That's a good question. I don't know.  
 7 A. Then I would have to say no.  
 8 Q. Have you had any conversations with  
 9 anyone from the press, whether it be radio,  
 10 television, newspaper, about the recording?  
 11 A. Yes.  
 12 Q. Okay. Who?  
 13 A. Stephanie Lucas.  
 14 Q. Anybody else?  
 15 A. No.  
 16 Q. Have you --  
 17 A. I take that back. Yes, I have.  
 18 Q. Okay.  
 19 A. My State Farm PR person.  
 20 Q. Who is that?  
 21 A. I don't remember their name.  
 22 Q. Where are they located?  
 23 A. I believe Washington state.  
 24 Q. Did you contact them or did they contact  
 25 you?

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1 A. I contacted them.  
 2 **Q. Is that a man or a woman?**  
 3 A. Man.  
 4 **Q. And you don't recall his name?**  
 5 A. No.  
 6 **Q. But you contacted him?**  
 7 A. Yes.  
 8 **Q. Do you recall when you contacted him?**  
 9 A. It was shortly after I found out about  
 10 the article.  
 11 **Q. By telephone?**  
 12 A. Yes.  
 13 **Q. And what did you contact him about?**  
 14 A. I just wanted to give him a heads-up  
 15 that an article was coming out and that to my  
 16 knowledge State Farm wasn't going to be mentioned.  
 17 **Q. Okay.**  
 18 A. But I thought it was a professional  
 19 courtesy to let him know.  
 20 **Q. Have you ever discussed the substance of**  
 21 **the recording with Chad?**  
 22 A. Yes.  
 23 **Q. Okay. When?**  
 24 A. A few days after it happened.  
 25 **Q. Did you listen to it together?**

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1 A. No.  
 2 **Q. Okay.**  
 3 A. I had my list of questions from it for  
 4 him.  
 5 **Q. Okay. Do you still have the -- was that**  
 6 **a written list?**  
 7 A. Yes.  
 8 **Q. Okay. Do you still have the list?**  
 9 A. No.  
 10 **Q. Do you recall what questions were on**  
 11 **that list?**  
 12 A. That group, if they were a militia or  
 13 not. I wanted to know about his involvement with  
 14 Ammon Bundy. I wanted to know his involvement with  
 15 Eric Parker and more details about the whole thing.  
 16 It was confusing to me. I needed to know about if he  
 17 had an affair, what the texts were that Adam saw, if  
 18 he knew, any idea. We were all confused. I wanted  
 19 to know what his attitude towards women was. I  
 20 wanted to know more detail about the Idaho Freedom  
 21 Foundation. There's some -- he goes to Visits a  
 22 Grave. I didn't understand any of that. So I wanted  
 23 to know more about --  
 24 **Q. Say that again?**  
 25 A. Visits a Grave. He mentioned it.

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1 Anyway, so I needed to know about that organization.  
 2 So I wanted to know what organizations he was  
 3 involved in. Attitude towards women was a big one  
 4 for me.  
 5 **Q. Okay. Any others that you can think of?**  
 6 A. I wanted to know why he stayed at night  
 7 while I was working but not -- that had nothing to do  
 8 with the recording, I guess, but the conversation  
 9 here. That's about it. Oh, I did make a crack about  
 10 the free tampons and that.  
 11 **Q. Okay.**  
 12 A. Besides that...  
 13 **Q. Did you discuss campaign finance or**  
 14 **election donations with Chad?**  
 15 A. Oh, I did bring that up, yes.  
 16 **Q. Okay.**  
 17 A. And some Young Conservatives group.  
 18 **Q. Young Conservatives?**  
 19 A. I have no clue what they are called. It  
 20 was brought up in the recording.  
 21 **Q. Okay.**  
 22 A. Young Republicans. I don't know.  
 23 **Q. All right. Did you talk to Chad about**  
 24 **his law enforcement career?**  
 25 A. No.

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1 **Q. To the best of your recollection, what**  
 2 **did Chad say about his affiliation with Ammon Bundy?**  
 3 A. Ammon Bundy, he said that he had met him  
 4 a few times and that he really hadn't had a lot to do  
 5 with him as of lately.  
 6 **Q. Okay. Anything else about Ammon Bundy?**  
 7 A. He said he was a spiritual man, really  
 8 spiritual and you could feel it when you were around  
 9 him.  
 10 **Q. Okay.**  
 11 A. But he hadn't had anything to do with  
 12 him, I want to say, for, like, the last six months,  
 13 year. I can't remember. But he said he hadn't been  
 14 doing stuff with him.  
 15 **Q. Okay. I think you said -- I think you**  
 16 **said "that group," but I think you were probably**  
 17 **referring to the Real Three Percent?**  
 18 A. Yes. That group.  
 19 **Q. Okay. What did he say about the Real**  
 20 **Three Percent?**  
 21 A. He laughed at the accusations it was a  
 22 militia. He told me to look it up and kind of come  
 23 to my conclusions of what I thought it was.  
 24 **Q. Okay. Did he say anything else about**  
 25 **it?**

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1 A. He said that there was a Facebook page  
2 that got shut down. He said that because people had  
3 said some bad, negative things on the Facebook page  
4 that were not good.  
5 **Q. Did he tell you what had been said**  
6 **that --**  
7 A. No. I don't recall. I didn't really  
8 care, honestly.  
9 **Q. Okay.**  
10 A. I just wanted to know if they were  
11 militia or not.  
12 **Q. Okay. Do you recall anything else they**  
13 **said about the Real Three Percent?**  
14 A. He told me what the meaning, where it  
15 came from.  
16 **Q. Okay. And we discussed this a little**  
17 **bit earlier. Was that the same conversation that --**  
18 A. Yeah.  
19 **Q. Okay.**  
20 A. Yeah, it was.  
21 **Q. All right. What did he say about Eric**  
22 **Parker, his affiliation with Eric Parker?**  
23 A. He told me he was about -- no, I read  
24 this from the article but I had questions about the  
25 famous picture at the Bundy standoff.

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1 **Q. Uh-huh.**  
2 A. He had to remind me what the Bundy  
3 standoff was because I didn't remember.  
4 **Q. Okay. Do you recall what he said it**  
5 **was?**  
6 A. No. No. I questioned him about the  
7 picture a little bit.  
8 **Q. Okay.**  
9 A. I said it doesn't look like he's aiming  
10 a gun at anyone. I asked him if he knows Eric  
11 Parker. I said I really, really was impressed with  
12 the NPR article about Parker. I thought it was  
13 really awesome about what he did with the police  
14 officers. And so I -- I said he sounds like he's a  
15 pretty decent guy --  
16 **Q. Okay.**  
17 A. -- from reading that article.  
18 **Q. Okay. Anything else that Chad said**  
19 **about it?**  
20 A. He said he is a good guy. He's like:  
21 He's very nice.  
22 **Q. Okay.**  
23 A. Really helpful. That's about it.  
24 **Q. Did he say in what way he was helpful?**  
25 A. No. He just said he was a nice guy.

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1 **Q. Okay. You mentioned asking him about an**  
2 **affair. Did you -- what did he say about that?**  
3 A. He hadn't -- he didn't have an affair.  
4 **Q. Okay. Is there anything else about the**  
5 **texts that Adam saw that you've discussed with Chad**  
6 **that you haven't already shared with me?**  
7 A. Anything else?  
8 **Q. That you and Chad discussed about those**  
9 **text messages that we haven't already talked about**  
10 **today?**  
11 A. He discussed Adam a little bit, just,  
12 you know.  
13 **Q. What did he say about Adam?**  
14 A. That he would have -- he had no clue  
15 what Adam was -- had.  
16 **Q. Okay. Anything else?**  
17 A. That he discussed about Adam?  
18 **Q. Yes. Or the texts that we haven't**  
19 **already talked about?**  
20 A. No.  
21 **Q. Okay. You mentioned that you discussed**  
22 **the Idaho Freedom Foundation --**  
23 A. Yes.  
24 **Q. -- with Chad. What was that discussion?**  
25 A. He told me it wasn't a membership group.

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1 **Q. Okay. We've talked about that. Was**  
2 **there anything else that Chad shared with you about**  
3 **the Idaho Freedom Foundation?**  
4 A. He explained to me what it was.  
5 **Q. What did he say it was when he explained**  
6 **what it was?**  
7 A. I think I said it earlier, like, it --  
8 described it as, like, keeping the beliefs of Idaho.  
9 **Q. Okay.**  
10 A. Yeah. So, you know, conservative.  
11 **Q. Okay. What did you ask him about his**  
12 **attitude towards women?**  
13 A. I asked him if he had problems with  
14 women, direct and blunt.  
15 **Q. That was your question: Do you have**  
16 **problems with women?**  
17 A. Yeah: What are your issues with women?  
18 **Q. Okay. What did he say?**  
19 A. He said: I don't have issues with  
20 women.  
21 **Q. Okay. Anything else about that?**  
22 A. Yes. Uh-huh. I said -- I said: You  
23 know, is there going to be problems with -- and he  
24 said: I have no issues with women. And he kind of  
25 reminded me of that. It went into the conversation



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1 about -- it kind of came out why -- he explained why  
 2 he was staying late because he didn't think it was a  
 3 safe neighborhood for me to be there by myself.  
 4 **Q. Okay.**  
 5 A. We discussed a comment that he made in  
 6 the office.  
 7 **Q. What was that comment?**  
 8 A. Someone came in and they had made a  
 9 comment that it was nice to see a man around here.  
 10 And he shut them down and said that -- and I found  
 11 this out through Rebecca, but he shut them down and  
 12 said: You know, I came here to learn from some of  
 13 the very best. These women are some of the best in  
 14 the industry.  
 15 **Q. Okay. Any other discussion about his,**  
 16 **quote/unquote, attitude towards women?**  
 17 A. No. No.  
 18 **Q. Okay. You mentioned Visits a Grave.**  
 19 **I --**  
 20 A. I -- that was above my --  
 21 **Q. Did you discuss that with him?**  
 22 A. Yeah.  
 23 **Q. Do you recall what he said?**  
 24 A. He said I should read about it. There's  
 25 some society.

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1 **Q. Okay.**  
 2 A. And he said I should look it up and read  
 3 about it.  
 4 **Q. Okay. Did he tell you about it at all?**  
 5 A. No. He says he --  
 6 **Q. Learn about it on your own?**  
 7 A. Yeah. He says: Learn about it. He  
 8 says: It's not -- he said: Read about it. I like  
 9 that.  
 10 **Q. Okay. Did you ask him -- you mentioned**  
 11 **asking him about what other organizations he belonged**  
 12 **to.**  
 13 A. Uh-huh.  
 14 **Q. Do you recall what organizations he**  
 15 **mentioned belonging to?**  
 16 A. He said -- he explained that he was a  
 17 constitutionalist and what that meant. I don't know  
 18 if that's an organization. He explained where his  
 19 passions came from. He kind of explained his why.  
 20 **Q. What did he say about his why?**  
 21 A. That he believes that our Constitution,  
 22 we need to be true to our Constitution and what's in  
 23 it.  
 24 **Q. Okay.**  
 25 A. And we need to hold people accountable

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1 who are trying to change that.  
 2 **Q. Okay. Anything else about**  
 3 **organizations?**  
 4 A. That was about it.  
 5 **Q. Okay. Did he say anything about**  
 6 **campaign finance?**  
 7 A. About what?  
 8 **Q. Campaign finance?**  
 9 A. He said it didn't happen, the  
 10 allegations didn't happen.  
 11 **Q. And you also mentioned an organization**  
 12 **called Young Conservatives.**  
 13 A. Yeah.  
 14 **Q. What did he say about that?**  
 15 A. He told me: I'm actually going to go  
 16 speak at something later in the -- later this year.  
 17 **Q. And it was associated with this**  
 18 **organization or something?**  
 19 A. Yeah. How he met them, yeah.  
 20 **Q. Okay.**  
 21 A. If that's the name. I don't recall the  
 22 name.  
 23 **Q. Okay. Do you know if he actually did go**  
 24 **and speak?**  
 25 A. Yes. I know he did.

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1 **Q. Do you recall when that was?**  
 2 A. No.  
 3 **Q. Do you have any information about where**  
 4 **that was?**  
 5 A. It was in Florida.  
 6 **Q. Have you discussed your communication**  
 7 **with Jennifer Ellis with anybody that we have not**  
 8 **already talked about?**  
 9 A. My husband.  
 10 **Q. What did you and your husband discuss**  
 11 **about Jennifer Ellis?**  
 12 A. Just that she called me.  
 13 **Q. Okay.**  
 14 A. I also discussed it with Nate Baldwin.  
 15 **Q. Who is Nate Baldwin?**  
 16 A. A business friend. He's an agent in  
 17 Blackfoot.  
 18 **Q. Okay. And what did you and Nate discuss**  
 19 **about it?**  
 20 A. I asked him if he had ever heard of her.  
 21 **Q. Okay. Had he?**  
 22 A. No.  
 23 **Q. Okay. Probably pretty short**  
 24 **conversation then, right?**  
 25 A. It was very short.

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1 **Q. Did you tell him about what she had**  
2 **said?**  
3 A. I just said I got a weird phone call  
4 from her about Chad. And I just wanted to know if he  
5 knew her, knew of her.  
6 **Q. Okay. Anybody else?**  
7 A. No.  
8 **Q. Aside from the people that were copied**  
9 **on your communication with Stephanie Mickelsen, have**  
10 **you discussed that communication with anybody else?**  
11 A. Yes, I have.  
12 **Q. Who?**  
13 A. I discussed it with my AAL, I believe is  
14 the exact title.  
15 **Q. What is that?**  
16 A. It would be kind of a sidestep of a boss  
17 of mine who is over more, like, the paperwork side of  
18 my business.  
19 **Q. Is that someone with State Farm?**  
20 A. Yeah.  
21 **Q. Okay. And you said AAL?**  
22 A. I think that's the title. I don't talk  
23 to him very often.  
24 **Q. If he's in charge of paperwork, that's**  
25 **probably a good thing.**

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1 **Have you had a chance to review or read**  
2 **the articles that Greg Pruett wrote?**  
3 A. I read the first one.  
4 **Q. Is that the only one you've read?**  
5 A. I believe I read the second one.  
6 **MR. ALLEN:** Okay. Let's mark this as 14.  
7 ([Exhibit 14](#) marked.)  
8 **Q. BY MR. ALLEN: This is a Facebook**  
9 **post -- excuse me, a Twitter. Yes, this is a tweet**  
10 **from Twitter. I've got to look at these more**  
11 **closely -- from Dustin Hurst, who I believe you said**  
12 **you don't know?**  
13 A. Nope.  
14 **Q. The date on this is October 20th, which**  
15 **is the day after your conversation with Greg.**  
16 A. Uh-huh. Day after?  
17 **Q. Day after.**  
18 A. I don't think I knew Greg at this point.  
19 **Q. Your conversation was October 19th?**  
20 A. Was it?  
21 **Q. Your Messenger conversation at a minimum**  
22 **was on October 19th and I believe you said that you**  
23 **had the --**  
24 A. It was October 24th.  
25 **Q. With Greg Graf?**

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1 A. Oh, Graf.  
2 **Q. Yes.**  
3 A. Sorry. Too many Gregs.  
4 **Q. Yes. Too many Gregs indeed.**  
5 A. Yes, 19th.  
6 **Q. So this is the day after and Dustin says**  
7 **to Greg Graf: My man, you are about to exposed for**  
8 **who you really are. The world will know and you**  
9 **won't be able to lie your way out of this one.**  
10 **Indisputable proof. Soon, buddy. Soon.**  
11 **Do you have any idea what he would be**  
12 **referencing?**  
13 A. No clue.  
14 **Q. Okay. This was the day after your phone**  
15 **call?**  
16 A. Yeah.  
17 (A recess was taken from 12:19 p.m. to  
18 1:35 p.m.)  
19 **Q. BY MR. ALLEN: You mentioned a name of**  
20 **an employee and we didn't get the last name. You**  
21 **said something about him being autistic.**  
22 A. Brayden.  
23 **Q. Brayden. What's the last name?**  
24 A. Smith.  
25 **Q. Smith. Okay. A couple of quick**

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1 **follow-up questions on the recording.**  
2 A. Uh-huh.  
3 **Q. You gave a copy to Chad --**  
4 A. Yes.  
5 **Q. -- and you gave a copy to Katie?**  
6 A. Yes.  
7 **Q. And if I recall correctly, you did not**  
8 **give a copy to anybody else?**  
9 A. No one else.  
10 **Q. Okay. Have you discussed with Katie**  
11 **whether or not she gave a copy to anyone?**  
12 A. No.  
13 **Q. Okay. You don't have any knowledge?**  
14 A. No knowledge at all.  
15 **Q. Have you discussed with Chad whether or**  
16 **not he gave a copy to anyone?**  
17 A. He had to have, I'm assuming.  
18 **Q. To your knowledge, did Chad give the**  
19 **copy to Greg Pruett?**  
20 A. I don't know how it went out.  
21 **Q. Okay.**  
22 A. Or how Greg Pruett got a copy, honestly.  
23 I've never asked him.  
24 **Q. You just don't have any idea?**  
25 A. No. I know Chad gave it to David Lyon,

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1 and that's the extent of what I know. David Lyon.  
 2 Is that his first name?  
 3 **Q. You know that because Chad told you**  
 4 **that?**  
 5 A. Yes.  
 6 **Q. Okay.**  
 7 A. Uh-huh.  
 8 **Q. All right. Do you recall Rod Furniss**  
 9 **asking you why you created the recording?**  
 10 A. Rod never asked me that.  
 11 **Q. Okay. Do you recall telling Rod Furniss**  
 12 **that Greg is a bad guy, Greg Graf is a bad guy?**  
 13 A. No.  
 14 **MR. ALLEN:** Okay. Let's mark this one next.  
 15 ([Exhibit 15](#) marked.)  
 16 **Q. BY MR. ALLEN: Do you recognize this?**  
 17 A. Yes.  
 18 **Q. What is this?**  
 19 A. This is an article by Greg Pruett.  
 20 **Q. Okay. Is this the article that came as**  
 21 **a result of the recording that you made with Greg**  
 22 **Graf?**  
 23 A. Yes.  
 24 **Q. Okay. Have you looked at this online?**  
 25 A. Yes, I have.

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1 **Q. And to your knowledge, are each of these**  
 2 **multimedia snippets, for example, on page 3 --**  
 3 A. Page 3?  
 4 **Q. Yeah. On page 3, is that a link to a**  
 5 **part of a recording?**  
 6 A. I wouldn't know. I didn't listen to it.  
 7 **Q. Okay. Did you read the story?**  
 8 A. I glanced over it quickly.  
 9 **Q. Okay. Let me direct your attention to**  
 10 **page 7.**  
 11 A. Uh-huh.  
 12 **Q. There at the bottom it says: Note,**  
 13 **Chad's employer will sound as though she agrees with**  
 14 **Graf during the phone call but her intention was only**  
 15 **to agree with Graf in order to get him to reveal his**  
 16 **alleged claims.**  
 17 A. Uh-huh.  
 18 **Q. Is that an accurate statement of your**  
 19 **intention?**  
 20 A. That is not an accurate statement.  
 21 **Q. Okay. Did you have any discussion with**  
 22 **Greg Pruett about anything like this?**  
 23 A. He made claims of that and I didn't say  
 24 anything.  
 25 **Q. Okay. So he made claims that that's how**

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1 **you approached this and you didn't -- you didn't**  
 2 **dispute it?**  
 3 A. He said that his wife heard the  
 4 recording and she had said something like that, but I  
 5 didn't know the guy. So I didn't really want to talk  
 6 to him about it.  
 7 **Q. Okay.**  
 8 A. He talked a lot and I said very few  
 9 words, honestly.  
 10 **Q. Okay. Do you recall anything else that**  
 11 **he had to say besides that his wife listened to it?**  
 12 A. He had a conversation with Frank about  
 13 something in the past, Frank VanderSloot. He talked  
 14 about that.  
 15 **Q. Did he tell you what that conversation**  
 16 **was?**  
 17 A. It was something in the past. I don't  
 18 recall a time frame at all. There had to do with  
 19 loss of job if he continued this -- if Greg Graf  
 20 continued this behavior.  
 21 **Q. Okay.**  
 22 A. Frank apologized to Greg Pruett and I  
 23 don't know the extent of anything. I wasn't aware of  
 24 anything, history here.  
 25 **Q. Okay.**

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1 A. And so it was very foreign to me.  
 2 **Q. Do you recall anything else that Greg**  
 3 **Pruett said in that conversation or said to you at**  
 4 **any time about any of this?**  
 5 A. He had made a comment about me just  
 6 being a State Farm agent and not being -- really  
 7 being anybody.  
 8 **Q. Okay.**  
 9 A. And taking down Greg Graf. Again, all  
 10 that was foreign to me.  
 11 **Q. Okay. So he expressed to you an**  
 12 **intention of taking down Greg Graf?**  
 13 A. That this was the result of my call.  
 14 **Q. Okay.**  
 15 A. A result. Not intention, result.  
 16 **Q. At any rate, his statement that it was**  
 17 **your intention to agree with Greg to get him to**  
 18 **reveal his claims is not a true statement?**  
 19 A. No, that is not a true statement.  
 20 **Q. Was what was your intention in agreeing**  
 21 **with Greg in the course of your conversations with**  
 22 **him?**  
 23 A. Honestly, about halfway through I was  
 24 kind of annoyed. And people who know me could tell,  
 25 how I say yes, those types of things, they could tell

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1 I was annoyed.  
 2 **Q. Okay.**  
 3 A. My intention was to find out if Chad  
 4 really threatened him with a gun.  
 5 **Q. Okay.**  
 6 A. My intention was finding out who I had  
 7 working for me. Were the women in my office safe?  
 8 **MR. ALLEN:** Okay. Let's mark this one 16. I  
 9 think this will be our last. Pretty sure.  
 10 **(Exhibit 16 marked.)**  
 11 **Q. BY MR. ALLEN: Let me direct your**  
 12 **attention to that second Facebook comment on that**  
 13 **page.**  
 14 A. Uh-huh.  
 15 **Q. Give you a minute to look at that and**  
 16 **read it.**  
 17 **Is this Facebook comment that Greg Graf**  
 18 **posted that initiated your engagement with him on the**  
 19 **East Idaho News article?**  
 20 A. No. It is not.  
 21 **Q. Okay. Do you recall seeing this**  
 22 **particular comment on that --**  
 23 A. Yes.  
 24 **Q. -- string?**  
 25 A. It was later in the thread. Yes.

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1 **Q. Okay. Do you know CoDele Lurker?**  
 2 A. Yes, I do.  
 3 **Q. Take a look at Exhibit 5.**  
 4 A. Yes.  
 5 **Q. I'll give you a minute to just take a**  
 6 **look through there and see if you can find the Graf**  
 7 **comment that instigated your questions.**  
 8 A. It's not there. As you look on page 4,  
 9 there's 12 replies that are hidden.  
 10 **Q. Okay. So it was in that portion of the**  
 11 **thread, to your recollection?**  
 12 A. Yes.  
 13 **Q. CoDele Lurker's comment that Chad is a,**  
 14 **quote, solid constitutionalist?**  
 15 A. That was not the comment that got my  
 16 attention but --  
 17 **Q. I'm sure. But you're saying that that's**  
 18 **where I want to find --**  
 19 A. Yes.  
 20 **Q. That's the portion of the thread I need**  
 21 **to be looking at? Okay.**  
 22 A. Yes.  
 23 **Q. Do you recall how long after this**  
 24 **exchange it was that you deleted your comments?**  
 25 A. It was about the same time that I

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1 blocked Greg Graf.  
 2 **Q. Okay. Do you recall when that was?**  
 3 A. It was a few days. No, I don't recall  
 4 the date.  
 5 **Q. Okay. "A few days," meaning a few days**  
 6 **after this exchange and your recording the phone**  
 7 **call?**  
 8 A. Yes. Yes.  
 9 **Q. Okay. All right. Do you have Exhibit 2**  
 10 **there?**  
 11 A. Yes.  
 12 **Q. First page there, right at the middle of**  
 13 **the page you state: I'm not mad or anything --**  
 14 A. Uh-huh.  
 15 **Q. -- I'm just done. I told Pruett he**  
 16 **doesn't have my permission to use my recording.**  
 17 A. Yes.  
 18 **Q. Okay. So that is something you**  
 19 **communicated to Greg Pruett?**  
 20 A. You have a copy of that, yes.  
 21 **Q. And what did Greg say? What was his**  
 22 **response to you telling him that?**  
 23 A. He asked to talk to me.  
 24 **Q. Okay. Did you at some point in time**  
 25 **change your position on that and give him permission**

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1 **to use your recording?**  
 2 A. No.  
 3 **Q. Okay. Take a look at page 2 in the same**  
 4 **exhibit. Very top comment: They think Graf is**  
 5 **fired. Who is "they"; do you know?**  
 6 A. What?  
 7 **Q. The very top comment on page 2, it says:**  
 8 **They think Graf is fired. Do you --**  
 9 A. From what I assumed, it was Pruett.  
 10 **Q. Okay. So you don't know who Chad is**  
 11 **referring to when he says "they"?**  
 12 A. No.  
 13 **Q. Okay. Take a look at page 3.**  
 14 A. Yes.  
 15 **Q. Just below the middle of the page. Chad**  
 16 **says: Oh brother, he got karma. He was part of**  
 17 **getting me fired at Farm Bureau and then he tried to**  
 18 **get me fired with you. You know he was part of it at**  
 19 **Farm Bureau.**  
 20 A. Uh-huh.  
 21 **Q. Did Chad ever tell you anything beyond**  
 22 **these statements here about his belief that Greg Graf**  
 23 **tried to get him fired at Farm Bureau?**  
 24 A. Not that I recall.  
 25 **Q. Okay. So you don't have any knowledge**

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1 what Chad might be referring to here then?  
 2 A. Besides the relationship between Graf  
 3 and Stephanie, no.  
 4 Q. Okay. Let's go to [Exhibit 8](#). This is  
 5 your communication with Chad where we don't have his  
 6 side of the conversation so this may be a little  
 7 challenging.  
 8 A. Uh-huh.  
 9 Q. Page 3, your first comment there or your  
 10 first message. It ends: I might actually vote  
 11 Biden. It's not like my vote matters here. I just  
 12 want them to see they are losing power in Idaho  
 13 Falls.  
 14 But my question is related to that last  
 15 sentence: "Them" and "they." Who are you referring  
 16 to? Who is "them" and who are "they"?  
 17 A. All of the nasty people that are  
 18 fighting back and forth.  
 19 Q. Okay.  
 20 A. This whole garbage.  
 21 Q. Okay. So that could be a reference to  
 22 any number of these people?  
 23 A. Graf. Everybody. I think that's --  
 24 yeah. Everybody.  
 25 Q. Okay.

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1 A. I also said I was voting for Kanye for a  
 2 while too so...  
 3 Q. All right. Same exhibit. Let's see, go  
 4 to page 5.  
 5 A. I didn't count.  
 6 Q. It's got the big -- this one.  
 7 A. Okay. Wonderful.  
 8 Q. All right. They are. That is why I  
 9 have always leaned to that side. I am kind of over  
 10 those two.  
 11 Do you know who you're talking about  
 12 there?  
 13 A. I'm talking about Graf, I believe, and  
 14 Stephanie Mickelsen.  
 15 Q. Okay. Next sentence: I don't have  
 16 proof but I know he leaked the White Pine stuff to  
 17 the news.  
 18 What are you referring to there?  
 19 A. There was an article that came out  
 20 about -- that I gave you a copy of.  
 21 Q. Is that the one that was attached to  
 22 Stephanie's --  
 23 A. Yes. It was.  
 24 Q. -- e-mail?  
 25 A. Exhibit -- whatever. Oh, right in front

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1 of me. [Exhibit 7](#).  
 2 Q. This one?  
 3 A. Yes.  
 4 Q. Okay. And what is the basis for your  
 5 conclusion that Mr. Graf leaked that to the news?  
 6 A. My basis is that Graf told me he was the  
 7 one who took Adam Frugoli down. And the biggest  
 8 thing that happened to Adam right before was the  
 9 article. Devin Bodkin reported for Idaho Ed News,  
 10 did the article. He told me he would call me five  
 11 minutes or text me five minutes before the article  
 12 went live. I got that text and within a few seconds  
 13 Stephanie Mickelsen shared that.  
 14 Q. Okay.  
 15 A. Within a few seconds.  
 16 Q. Okay.  
 17 A. So my conclusion was that they were  
 18 behind that from what he said.  
 19 Q. Would it surprise you to learn that they  
 20 weren't behind that?  
 21 A. What?  
 22 Q. Would it surprise you to learn that they  
 23 were not behind that and did not leak that  
 24 information to Idaho Ed News?  
 25 A. Would it surprise me?

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1 Q. Yes.  
 2 A. Probably not.  
 3 Q. Okay. Did you ever ask the author of  
 4 the article who told him?  
 5 A. No.  
 6 Q. Same exhibit, last page. Your second to  
 7 last message here: Doyle is going to sue Graf. He  
 8 has listened to it.  
 9 I think the first sentence, its fair to  
 10 say, is self-explanatory.  
 11 A. Second to last page or last page?  
 12 Q. Last page, second to last comment.  
 13 Unless I'm missing a page?  
 14 A. You might be missing a page.  
 15 Q. Yeah, your last page looks different  
 16 than my last page.  
 17 A. Oh, that's second to last page.  
 18 Q. Okay.  
 19 A. Okay.  
 20 Q. Can I take a look at that? Since I  
 21 haven't seen the last page, just to make sure that I  
 22 don't have any questions about it.  
 23 MR. SMITH: So are you missing the last page?  
 24 Is that the issue?  
 25 MR. ALLEN: Yeah. Unless maybe they're just

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1 out of order. I've got it. I don't know if mine is  
 2 out of order or hers is out of order. But they're  
 3 all there anyway. Thanks to Messenger and the dates  
 4 it's impossible to tell which message was sent when.  
 5 **Q. BY MR. ALLEN: He has listened to it.**  
 6 **I assume by "he" you mean Doyle?**  
 7 A. I don't know Doyle.  
 8 **Q. Well, this is your message. So I'm**  
 9 **trying to figure out --**  
 10 A. I would -- I would -- I believe it was  
 11 probably Smith right here.  
 12 **Q. Do you know Doyle Beck?**  
 13 A. No. I don't know Doyle Beck.  
 14 **Q. Okay. Do you know if Doyle Beck**  
 15 **listened to the recording?**  
 16 A. I was told he had heard it.  
 17 **Q. Okay. Do you know how he heard it?**  
 18 A. No clue.  
 19 **Q. You don't know who provided it to him?**  
 20 A. No.  
 21 **Q. Okay. So your last page, first**  
 22 **comment --**  
 23 A. Uh-huh.  
 24 **Q. -- my second to last page: He wants**  
 25 **Graf to lose his job.**

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1 A. Yep.  
 2 **Q. Do you know who "he" is in that**  
 3 **reference?**  
 4 A. That would be Greg Pruett.  
 5 **Q. Okay. You're pretty sure on that one**  
 6 **that that's Greg Pruett. Why are you so sure?**  
 7 A. Because it was after my conversation  
 8 with Greg.  
 9 **Q. With Greg Pruett?**  
 10 A. Uh-huh.  
 11 **Q. Okay. So Greg Pruett told you that he**  
 12 **wanted Greg Graf to lose his job?**  
 13 A. Yes.  
 14 **Q. Okay. Let's look at [Exhibit 7](#). This is**  
 15 **your correspondence with Stephanie, correct?**  
 16 A. Yes.  
 17 **Q. Stephanie Mickelsen?**  
 18 A. Yes.  
 19 **Q. Okay. I want you to look at page 3 of**  
 20 **the exhibit, which would be your original or initial**  
 21 **communication to Stephanie.**  
 22 A. Yep.  
 23 **Q. First paragraph you reference: There**  
 24 **have been a few things that now affect all of us.**  
 25 **Is that a reference to the recording?**

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1 A. What paragraph was that? I'm so sorry.  
 2 **Q. First paragraph. The first clause in**  
 3 **the last sentence.**  
 4 A. No. That would not be the recording.  
 5 **Q. Okay. What are you referring to there?**  
 6 **There have been a few things that now affect all of**  
 7 **us.**  
 8 A. That would be the conversation with  
 9 Greg.  
 10 **Q. The conversation that was recorded?**  
 11 A. Yes.  
 12 **Q. Okay.**  
 13 A. Not the recording particularly but that  
 14 conversation and the hiring of Chad.  
 15 **Q. Gotcha. Okay.**  
 16 A. Uh-huh.  
 17 **Q. I had some specific questions about this**  
 18 **exhibit and now I can't find my references. Last**  
 19 **paragraph.**  
 20 A. What page?  
 21 **Q. Page 3 still.**  
 22 A. Okay.  
 23 **Q. First sentence: After speaking to my**  
 24 **legal counsel I just wanted to let you know that**  
 25 **these rumors about all of you are going around the**

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1 **political arena and in the insurance community.**  
 2 **What rumors are you referring to there?**  
 3 A. About why they let Chad go.  
 4 **Q. Okay.**  
 5 A. The stuff that I stated, both, in the  
 6 above paragraph.  
 7 **Q. Okay. Did you hear any of that**  
 8 **information from anyone besides Mr. Graf?**  
 9 A. Jennifer Ellis. No, it was mainly  
 10 Mr. Graf.  
 11 **Q. Okay. Let's take a look at the same**  
 12 **page, same paragraph second to last sentence: It**  
 13 **appears to other people that you are using someone's**  
 14 **personnel record to the public for political gain or**  
 15 **advantage.**  
 16 **Who are you referring to when you**  
 17 **say "other people"?**  
 18 A. Myself, comments that Danell and Rebecca  
 19 made in my office.  
 20 **Q. What comments did they make?**  
 21 A. That it appears that they are using it  
 22 for political gain.  
 23 **Q. Okay.**  
 24 A. Comments Graf made.  
 25 **Q. Okay. Did any of them identify any**

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1 other people?  
 2 A. No.  
 3 Q. Okay. Let's take a look at page 1,  
 4 second paragraph, first sentence.  
 5 A. Yes.  
 6 Q. When I have been told by a few people  
 7 that you shared personnel files with them, it did  
 8 seem very off.  
 9 Who are you referring to there?  
 10 A. Gregory Graf, Jennifer Ellis.  
 11 Q. Just those two?  
 12 A. Yes.  
 13 Q. Okay. Third -- fourth paragraph, excuse  
 14 me, first sentence: The information that was  
 15 received about your PAC was given to me and me alone.  
 16 What information are you referring to  
 17 there?  
 18 A. Let me look over it again.  
 19 I believe it was information -- Gregory  
 20 Graf.  
 21 Q. Okay. And then you state you only told  
 22 Chad about it on Friday.  
 23 A. Uh-huh.  
 24 Q. Only told --  
 25 A. All of the information I received.

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1 Q. Okay.  
 2 A. Uh-huh.  
 3 Q. So looking at our time line then you  
 4 talked to Greg on Monday, the 19th of October.  
 5 A. Uh-huh.  
 6 Q. And you talked to Chad on Friday the  
 7 23rd of October?  
 8 A. Yes.  
 9 Do you mind if I send a message really  
 10 fast? I have a 2:00 that I am obviously not going to  
 11 make. I didn't look at my clock.  
 12 Okay. Continue. Sorry about that.  
 13 Q. And I really am just about done here.  
 14 Okay. Sorry. Back up on the second  
 15 paragraph.  
 16 A. Front page?  
 17 Q. Yeah.  
 18 A. Okay.  
 19 Q. Sorry, I saw some things on his page but  
 20 never looked into it. When we talked it had more to  
 21 do with future goals and aspirations, not the past.  
 22 Do you know what you're referring to: I  
 23 saw some things on his page? First of all, do you  
 24 know whose page you're talking about?  
 25 A. I'm assuming his Facebook page.

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1 Q. Whose Facebook page?  
 2 A. Chad's.  
 3 Q. Okay. And you don't have any real  
 4 recollection as we sit here today what you're  
 5 referring to there?  
 6 A. Yeah. About his history with Farm  
 7 Bureau.  
 8 Q. Okay. Do you recall what it was, what  
 9 it said about his history with Farm Bureau?  
 10 A. That he was let go for political  
 11 reasons.  
 12 Q. Okay. And then beginning the next  
 13 paragraph: When concerns were brought to me I went  
 14 to my all-female office to see if they had anything,  
 15 seen anything off -- you say "when concerns were  
 16 brought to me." Is that a reference to concerns that  
 17 were raised by Mr. Graf?  
 18 A. Yes.  
 19 Q. Concerns that were raised by Mr. Lima?  
 20 A. No. It was basically Graf's.  
 21 Q. Okay.  
 22 A. Uh-huh.  
 23 Q. So at this point in time, you just  
 24 glossed over the concerns raised by Mr. Lima and  
 25 Mr. Furniss?

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1 A. No. It was just the concerns were  
 2 Graf's.  
 3 Q. Okay.  
 4 A. Yeah.  
 5 MR. ALLEN: Okay. Let's take a five-minute  
 6 break and I will consult with my client and I think  
 7 I'm done.  
 8 (A recess was taken from 2:13 p.m. to  
 9 2:16 p.m.)  
 10 MR. ALLEN: Could you go back and read the  
 11 question that I had asked?  
 12 (Requested portion of record read.)  
 13 Q. BY MR. ALLEN: Is that correct?  
 14 A. Yeah.  
 15 Q. Would that have been when you had the  
 16 conversation with Chad that you had the list that you  
 17 went over with him?  
 18 A. We went over it a few different times  
 19 because he told me to go look at it, read about it.  
 20 Q. Well, I'm just trying to get a handle on  
 21 the time line. So you had the communication with  
 22 Greg Graf on Monday?  
 23 A. Uh-huh.  
 24 Q. And to your recollection was it two days  
 25 later that you provided a copy of the recording to

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1 Chad?  
 2 A. Two or three, yeah.  
 3 Q. You said you thought you e-mailed it and  
 4 then you determined there wasn't an e-mail.  
 5 A. No.  
 6 Q. Do you know how else you might have sent  
 7 that to him?  
 8 A. I had to send it over Messenger would be  
 9 my guess.  
 10 Q. Would that have been to his old and  
 11 now-deleted account?  
 12 A. Yes. It would have been.  
 13 Q. Okay. Does Chad provide you with  
 14 details on his comings and goings in terms of his  
 15 work schedule and travel plans, et cetera?  
 16 A. High level.  
 17 Q. What do you mean by "high level"?  
 18 A. I don't care about when he comes and  
 19 goes.  
 20 Q. Okay.  
 21 A. Or when he's working on it.  
 22 Q. Do you know --  
 23 A. So if he's going to be gone for a while,  
 24 he tells me but...  
 25 Q. Okay. Does he tell you where he's

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1 going?  
 2 A. Sometimes.  
 3 Q. Do you know where he was on January 6th  
 4 of this year?  
 5 A. I don't have my calendar in front of me.  
 6 Q. Okay. You don't recall?  
 7 A. So no. No, I don't recall. Is that  
 8 when session started?  
 9 Q. No.  
 10 MR. SMITH: That's when there was a riot at  
 11 the United States capitol. He was probably there.  
 12 MR. ALLEN: Certainly goes to the heart of  
 13 the issue.  
 14 THE WITNESS: January 6th?  
 15 Q. BY MR. ALLEN: January 6th.  
 16 A. Was that when that was?  
 17 Q. That's when that was.  
 18 MR. SMITH: That's why he's asking you.  
 19 THE WITNESS: He wasn't there. He was in the  
 20 office that day.  
 21 Q. BY MR. ALLEN: Well, you just told me  
 22 you don't know.  
 23 A. Yeah, I can tell you he was in the  
 24 office that day.  
 25 Q. You're certain he was in the office that

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1 day?  
 2 A. I'm pretty confident he was in the  
 3 office that day. Yes.  
 4 Q. Very good.  
 5 A. I can double-check on my calendar if  
 6 you'd like, but I'm pretty confident he was in the  
 7 office that day.  
 8 Q. Yeah, that would be great if you'd  
 9 double-check and let Mr. Smith know, confirm that.  
 10 MR. ALLEN: To me it's not funny because we  
 11 know that there were people from Idaho back there, so  
 12 it's a relevant question. It's pertinent. I hope he  
 13 wasn't there.  
 14 MR. SMITH: Well, I didn't instruct her not  
 15 to answer.  
 16 MR. ALLEN: No, you didn't. Why would you?  
 17 THE WITNESS: I'm glad you knew the date. I  
 18 didn't know the date.  
 19 MR. ALLEN: It's pretty engrained in my mind.  
 20 It's one of the saddest days in my recollection in  
 21 American history. But I don't have any further  
 22 questions.  
 23 MR. SMITH: Any other questions today?  
 24 MR. DINDINGER: I'd like to cross briefly.  
 25 THE WITNESS: Yes.

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1 EXAMINATION  
 2 BY MR. DINDINGER:  
 3 Q. You mentioned that when Rod Furniss  
 4 warned you about Chad that you took his warnings to  
 5 either be sexist or womanizer -- it could have  
 6 indicated kind of sexism or womanizing; is that  
 7 accurate?  
 8 A. Uh-huh. Yeah.  
 9 Q. Would it make sense to you for a sexist  
 10 to take employment at an all-woman office?  
 11 A. I was really surprised by that.  
 12 Q. Would it also surprise you that a sexist  
 13 would take a job working for -- directly under a  
 14 woman?  
 15 A. Especially me, uh-huh.  
 16 Q. And why especially you?  
 17 A. Because I am not quiet or passive. My  
 18 business training was on the east coast. So I'm  
 19 pretty direct and that is something people have a  
 20 struggle with. I don't use the normal female nice  
 21 words here. I'm straight-on East.  
 22 Q. Understood. I think you also mentioned  
 23 that Rod Furniss told you that he had never had  
 24 direct problems with Chad Christensen himself?  
 25 A. Yeah.



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1 Q. But he had heard --  
 2 A. Uh-huh.  
 3 Q. -- from other people; is that accurate?  
 4 A. Yes. Yes, that is accurate.  
 5 Q. Okay. Did he mention who he had heard?  
 6 A. No. He did not.  
 7 Q. Okay.  
 8 A. No.  
 9 Q. Okay. We had some discussion earlier  
 10 that Jen, who I believe we identified as Jennifer  
 11 Ellis, Mr. Graf had asked you if Jen had given you  
 12 the idea about guns and masks.  
 13 A. Uh-huh.  
 14 Q. And specifically -- I just want to be  
 15 super clear. The idea would be that you would  
 16 institute an office policy: No guns, masks at all  
 17 times; is that what you understood?  
 18 A. Yes.  
 19 Q. Okay. And I think you said that you  
 20 thought the purpose of that was to get rid of Chad?  
 21 A. Uh-huh. I believe that's what he had  
 22 said in the comment.  
 23 Q. Okay. And why -- as best you  
 24 understand -- would that get rid of Chad or why could  
 25 that get rid of Chad?

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1 A. Because he likes guns and he doesn't  
 2 like masks.  
 3 Q. And as far as you are aware, Chad  
 4 Christensen carries guns in a legal manner; isn't  
 5 that correct?  
 6 A. Very legal manner. I've observed --  
 7 I've observed how he carries his guns. I watch.  
 8 Q. And as you sit here today, do you have  
 9 any indication that Chad Christensen has ever engaged  
 10 in any kind of misconduct with guns?  
 11 A. No. We had a good conversation about  
 12 it. He is very responsible with guns. Very, very  
 13 responsible.  
 14 Q. Thank you. Did Mr. Graf ever indicate  
 15 to you that he is connected to the FBI, the Federal  
 16 Bureau of Investigation, in some way?  
 17 A. Yes. He did.  
 18 Q. And as best as you can recollect, what  
 19 did he indicate about that connection or  
 20 relationship?  
 21 A. He said that he was basically the main  
 22 point of contact for information on the militias in  
 23 Idaho.  
 24 Q. And why do you think he would have told  
 25 you that in that conversation?

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1 MR. ALLEN: Objection. Speculation.  
 2 MR. DINDINGER: Thank you.  
 3 Q. BY MR. DINDINGER: Go ahead.  
 4 A. It would be to gain trust would be my  
 5 guess on it.  
 6 Q. Do you have any legally privileged  
 7 relationship with Greg Graf as far as you understand?  
 8 A. Legally privileged?  
 9 Q. Well, let's -- let me ask you this: Are  
 10 you an accountant?  
 11 A. No.  
 12 Q. But I think your firm does deal in some  
 13 financial products; is that right?  
 14 A. Very much. Very much so.  
 15 Q. But you're not an accountant and you've  
 16 never been Mr. Graf's accountant; is that right?  
 17 A. Never.  
 18 Q. Okay. Are you a member of the clergy at  
 19 his church?  
 20 A. No.  
 21 Q. Okay. Are you his attorney?  
 22 A. No.  
 23 Q. Are you a licensed physician or  
 24 psychotherapist?  
 25 A. No.

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1 Q. And I assume that it's safe to say  
 2 you've never been married to Mr. Graf?  
 3 A. Yeah, never been married.  
 4 Q. Okay. Are you a school counselor?  
 5 A. No.  
 6 Q. Are you licensed social worker?  
 7 A. No.  
 8 Q. Are you employed by a hospital or  
 9 medical society?  
 10 A. No.  
 11 Q. And you're not a member of a medical  
 12 malpractice screening panel; is that right?  
 13 A. No. I am not.  
 14 Q. Okay. Did you ask for or receive from  
 15 Chad Christensen any form of consent for Mr. Graf to  
 16 make defamatory statements about Chad Christensen?  
 17 A. No.  
 18 Q. Okay. Did Chad Christensen at any point  
 19 in time ask you to procure any statements from  
 20 Mr. Graf regarding him?  
 21 A. No.  
 22 Q. Did he ask you to procure any statements  
 23 from Mr. Graf at all?  
 24 A. No.  
 25 Q. Okay. Did Chad Christensen ever ask you

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1 to record any conversation?  
 2 A. No. He did not.  
 3 Q. Thank you. What is, as best you  
 4 understand, Chad Christensen's reputation in the  
 5 community?  
 6 A. He has some people that don't like him  
 7 and then he has a lot of people that really like him.  
 8 Really, really like him.  
 9 Q. If you perceived as an employer that a  
 10 perspective employee had an overall negative  
 11 reputation in the community, would that have impacted  
 12 your hiring decision?  
 13 A. Yes.  
 14 Q. I'm going to ask you a few questions  
 15 about some statements that were made on the recorded  
 16 phone call we've been discussing today.  
 17 A. Uh-huh.  
 18 Q. Did Mr. Graf indicate to you that Chad  
 19 Christensen is involved in, and I quote: Organized  
 20 criminal activity?  
 21 A. Yes.  
 22 Q. Did Mr. Graf indicate to you that  
 23 Mr. Christensen is involved in, and I quote:  
 24 Campaign finance criminal activity?  
 25 A. Yes.

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1 Q. Did Mr. Graf tell you, and I quote: I  
 2 say this with evidence, Chad is a sexual predator?  
 3 A. Yes.  
 4 Q. Did Mr. Graf represent to you that Adam  
 5 Frugoli had stated that Chad had sent inappropriate  
 6 pictures via text message?  
 7 A. Yes. Or messages. I can't remember.  
 8 Q. Okay. Did Mr. Graf represent to you  
 9 that Chad Christensen's behavior toward women is,  
 10 quote, dangerous, and, quote, he, meaning Chad  
 11 Christensen, is not a safe person when it comes to  
 12 that?  
 13 A. Yes.  
 14 Q. Was this before or after you had  
 15 indicated to Mr. Graf that you have an all-women  
 16 office?  
 17 A. That was before, I believe. Could have  
 18 been.  
 19 Q. Okay.  
 20 A. Yeah.  
 21 Q. Did Mr. Graf indicate to you that Chad  
 22 Christensen used his position as a state legislator  
 23 to get a girlfriend out of jail?  
 24 A. Yes.  
 25 Q. Did Mr. Graf indicate to you that Chad

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1 Christensen is involved in insurance fraud?  
 2 A. Yes.  
 3 Q. Did Mr. Graf indicate to you that Chad  
 4 Christensen failed to report campaign donations in  
 5 violation of Idaho law?  
 6 A. Yes.  
 7 Q. Did Mr. Graf say to you that Chad  
 8 Christensen is, quote: One of those guys that  
 9 desperately wants to be a cop and no one will hire  
 10 him to be a cop because he is not stable?  
 11 A. Yes.  
 12 Q. Thank you. Now, for all of those  
 13 statements I just mentioned, were there any that you  
 14 perceived to be a statement of opinion as opposed to  
 15 a statement of fact?  
 16 A. None at all.  
 17 Q. In other words, all of those you  
 18 perceived to be statements of fact?  
 19 A. He presented them as statements of  
 20 facts.  
 21 Q. Thank you. Since that conversation has  
 22 Mr. Graf provided any evidence that any of those  
 23 statements were true?  
 24 A. No.  
 25 Q. And I think it's an accurate summation

Page 152

1 of your testimony that Mr. Graf made several  
 2 references to Mr. Christensen's employment in your  
 3 office during that phone call?  
 4 A. Yes.  
 5 Q. Okay. If you found out that these  
 6 statements that Mr. Graf made to you were true, would  
 7 that impact Mr. Christensen's employment in your  
 8 office?  
 9 A. Yes.  
 10 Q. In your experience as a business owner  
 11 and employer in the area, if Mr. Graf's statements  
 12 about Chad Christensen were true or widely believed  
 13 to be true, would that impact his employment in this  
 14 area generally?  
 15 A. Yes, it would.  
 16 Q. To your knowledge, has Mr. Graf repeated  
 17 any of these statements to anyone else?  
 18 A. Yes.  
 19 Q. Who would that be?  
 20 A. Things that I heard Tony say, warnings  
 21 were similar to things that Greg has said. Things  
 22 that I went back in the past and started looking at  
 23 online, the comment about East Idaho News that he  
 24 threatened him with a gun, a lot of comments online.  
 25 A lot of comments online.





### Comment

43m Like Reply



**CoDele Lurker**

Gregory Graf all I know is you founded a fake conservative Facebook page where you block anyone who questions if it's actually conservative. And you came out of the gate on this article to attack a true conservative. Weird.

34m Like Reply



Top Fan

**Gregory Graf**

[EmmaLee Hammon Robinson](#) Eric Parker (famous for being the Bundy bridge sniper), the leader of the Idaho III% militia was there with Chad that day. I was informed by a state legislator that Parker's group was waiting for me in the parking lot to confront me. The Facebook live video they made while being confronted by the police proved that they were armed. The video is no longer online as Facebook removed the III% page (Chad was an admin) when they pulled down dangerous militia pages. I spoke with the FBI about this incident. This was connected to Federal agents confronting Eric Parker for threats he appeared to make online towards a Deputy US Attorney in Nevada that same weekend... See More

Just now Like Reply



Write a reply...





Gregory Graf



# Gregory Graf

Facebook

You're friends on Facebook

Lives in Idaho Falls, Idaho

OCT 19, 3:33 PM

Okay I wash just sending you a message.

If you have questions about this incident or my history with Chad I am happy to answer your questions honestly.



No problem happy to help

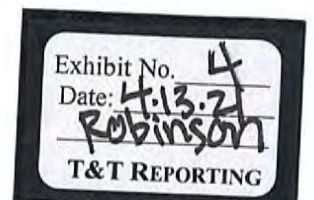
No this isn't for Chad. I hired him a few weeks ago. Our boys played baseball together. I am starting to see some flag and your



You've Blocked Gregory Graf's Facebook Account  
You can't message or call them in this chat, and you won't receive their messages or calls.

**Unblock**

**Something's Wrong**





**Gregory Graf**  
Active 48m ago



Okay I wash just sending you a message.

If you have questions about this incident or my history with Chad I am happy to answer your questions honestly.



No problem happy to help

No this isn't for Chad. I hired him a few weeks ago. Our boys played baseball together. I am starting to see some red flag and your comment concerned me.

I had a few people warn me when I hired him but nothing substantial.



You are wise to be concerned.

At first there was nothing but I am seeing some red flags. I have an all women's office except for him.

I'm not sure how much you want to know, there is a lot to unpack here. Chad came on my radar two years ago when one of his followers made a death threat towards me onli. ↓ since then I've received more threats to my life

1:22 ↗

Exhibit A



**Gregory Graf**

Active 48m ago



I'm not sure how much you want to know, there is a lot to unpack here. Chad came on my radar two years ago when one of his followers made a death threat towards me online, since then I've received more threats to my life from his circle of friends. Perhaps a phone call would be a better way to share this. For the record I am friends with Stephanie Mickelsen and am very aware of what really happened when his contract was terminated.



Yes let's talk. I want to leave my office first. I don't want to have this conversation here.

Can you give me 10 minutes.  
[208-970-5959](tel:208-970-5959)

He just seemed to get aggressive about things that our out of my control as an agent. It was not what I was use to.



Ok I'll call in 10

WED 7:40 AM



Sorry for the early morning



Aa



**Gregory Graf**

Active 48m ago



Sorry for the early morning message. I haven't been able to sleep much the past two night. Maybe we can talk again later. I talked to Adam and Jennifer. Adam told me the story but then played it off like I would be fine with Chad in my office. Jennifer made me very concerned.

WED 8:02 AM

Adam is closely connected to them, he really wants to run again. Did Jen give you the idea about requiring masks at your office and no guns at work policy? Where I work that is the policy, no weapons and masks at all times.



Nobody can fault you for taking safety seriously



No she didn't.

That's a great idea.

Last night I had to work on school board items. I was there until almost 9. 🙄 I had a lot to work on. He was there the whole time. Maybe I'm just paranoid.



Aa





1:22 ↗

Exhibit A



**Gregory Graf**

Active 48m ago



Last night I had to work on school board items. I was there until almost 9. 😞 I had a lot to work on. He was there the whole time. Maybe I'm just paranoid.

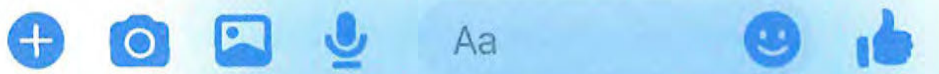
He would have seen the Facebook comments, his buddy David Lyon (super creepy guy) was commenting on the thread. I don't think you are paranoid.



Yes David has been in a lot.

Okay I want to share this but please don't tell anyone. My office has always been a safe place for women. One of my employees had to move out while her husband was at work because the abuse was so bad. I have another woman in my office who was sexually assaulted. I've always kept women safe. Now I feel like the very thing I've protected them from I've brought into the office.

I am so sorry. I completely understand and empathize. I respect what you said and will never share this.



1:22 ↖

Exhibit A



**Gregory Graf**

Active 48m ago



I am so sorry. I completely understand and empathize. I respect what you've said and will never share this.



Thanks maybe we can talk later. Jennifer shared an absolutely disgusting comment he made over free product in a woman's bathroom.

Oh the BSU bathroom drama. That actually made statewide news.



I have a meeting at 10 and then lunch with Mike Simpson. I might have a little time after lunch. Thanks so much.

No problem. Mike is great! Brennan Summers is a good friend (works for Mike)



WED 8:40 AM

Cool. I really like him. I guess just to be direct. You said you had messages of him being sexually explicit with women or they have shared with you. Is there anyway you can share some them? Adam really down played it. I just don't



Aa





**Gregory Graf**  
Active 48m ago



Cool. I really like him. I guess just to be direct. You said you had messages of him being sexually explicit with women or they have shared with you. Is there anyway you can show me them? Adam really down played it. I just done want to be alone in the office with a predator or any of my team.



I'm just looking for peace of mind. Sorry I bumped the thumbs up on my phone. I do that all the time. They need to move it.



I don't have the images, Adam had those, he described them to me but never sent them to me.



When he called me about them it was before he ran for office and was embedded with Bryan and Doyle. He won't cross them now.

Okay. No her won't. He told me what they were though. I'll go for the mask gun thing. Thanks I wouldn't have thought of it.



He won't



**Gregory Graf**  
Active 48m ago



Okay. No her won't. He told me what they were though. I'll go for the mask gun thing. Thanks I wouldn't have thought of it.

He won't

You could approach this a you wanting to be more aligned with what larger companies in Idaho Falls are doing and you want to take covid and safety seriously. Regardless of the situation, it's still not a bad thing to do anyway.



Also have you considered requiring employees to sign a NDA and non disparagement agreement? Considering how Farm B got trashed online, you would not want the same threat to your business.



WED 4:08 PM

9:30

📶 LTE 🔋



**Chad Christensen for Idaho**  
Yesterday at 8:57 PM · 🌐



20h Like Reply



👤 Author

**Chad Christensen for Idaho**  
Jen, sorry it definitely wasn't emotion first. T: s don't need to supply ↓ e hygiene products. s guess you think taxpayers should pay for



Aa





**Gregory Graf**

Active 48m ago



9:30

LTE



**Chad Christensen for Idaho**

Yesterday at 8:57 PM

20h Like Reply



Author

**Chad Christensen for Idaho**  
Jen, sorry it definitely wasn't emotion first. Taxpayers don't need to supply feminine hygiene products. I guess you think taxpayers should pay for all toiletries in public restrooms? I know a woman that has been surprised by her menstrual cycle. She waded up a bunch of toilet paper until she could get a feminine hygiene product. She didn't like it, but she dealt with it. Somehow, there is an entitlement here....."we demand tampons or pads be bad by taxpayers for public restrooms."

20h Like Reply



Jen asked me to send this to you.

WED 4:53 PM

Wow!!! Thanks.

Rep. Chad Christensen is growing more unstable.  
The LDS church actually defines Gadianton robbers as a gang of murderous thieves.  
As far as I know, Stephanie Michelsen is not part of an ancient MURDER CULT as Chad may be suggesting once again.  
[#idpol](#) [#idleg](#) [#MadChad](#)



Chad Christensen for Idaho  
Yesterday at 2:29 PM

Here is your so-called conservative, Ste Mickelsen. She is on the Farm Bureau board, directors and on the board of the College of Eastern Idaho. She is actually the vice-chair of the college.



Aa





**Gregory Graf**

Active 48m ago

bad by taxpayers for public restrooms."

20h Like Reply



Jen asked me to send this to you.

WED 4:53 PM

Wow!!! Thanks.

Rep. Chad Christensen is growing more unstable.

The LDS church actually defines Gadianton robbers as a gang of murderous thieves.

As far as I know, Stephanie Michelsen is not part of an ancient MURDER CULT as Chad may be suggesting once again.

[#idpol #idleg #MadChad](#)

**Chad Christensen for Idaho**  
Yesterday at 2:25 PM · 🌐

Here is your so-called conservative, Stephanie Mickelsen. She is on the Farm Bureau board of directors and on the board of the College of Eastern Idaho. She is actually the vice-chair of the college board. They have some nice extreme left curriculum, as you will see.

I've used the term Gadianton robber before. Those of my faith know what I mean. One pretends to be one thing in the public eye, then does this kind of stuff behind the scenes...opposite of how they portray themselves.

Click the link and see:

<https://www.thecollegefix.com/mandatory-class-at-idaho-college-tells-students-to-list-examples-of-white-and-male-privilege/>



And he loves to call people he does not like "Gadianton Robbers"



For the record that was my tweet.



Aa



Exhibit A

facebook

Sign Up

Email or Phone

jaredallen@me.com

Password

\*\*\*\*\*

Log In



East Idaho News

October 19, 2020 · 🌐

The seat includes Oneida, Teton, Caribou, Bear Lake, Franklin and part of Bonneville County.



EASTIDAHONEWS.COM

Bill Leake challenging incumbent Chad Christensen in Legislative District 32 Seat B - East Idaho News

👍👍👍 56

102 Comments 10 Shares

🔗 Share

Most Relevant ▾



Ame Murphy Christensen has always come across extremely arrogant and douchey. The freedom foundation isn't anything more than a far right extremist group. I haven't lived in Oneida County for many years, but if I did, I'd be voting Leake.

24w



Most Relevant is selected, so some replies may have been filtered out.



Kelsey Jo My politeness does not excuse another person's behavior. If you feel so inclined to post the entire conversation, then please do it. It will show your ineptness and it will also show the true context of the screenshots above, like the one in which I th... See More

24w · Edited



Ben Porter Hey, Chad and I don't always agree, and we've had some disagreements on Facebook. I will say that during my interactions, Chad was respectful and consistent. I still disagree with him on those issues but I admire his focus on freedom.

24w · Edited



👑 Top Fan

Marian Fisher Ruzicka Oh, I see, you make decisions based on one contact. Well how bout doing a little research on Bill Leake and what he did to his own county neighbors when he was a commish? I've followed Chad for several years now and there is no way in hell that I would

Related Pages



A Little Town Called Rigby, Idaho City



Clothing Revival Idaho Falls Women's Clothing Store



The Dealio - Idaho Falls Advertising Agency



Idaho Road and Weather Conditions Community Service



Mike Price Journalist



Intermountain Farm & Ranch Newspaper



Gephardt Approved News & Media Website



D91 Proud - Idaho Falls School District Interest



MINIDOKA MEMORIAL HOSPITAL Hospital



Idaho Falls Community Hospital Emergency Room



South Fremont Boys Basketball Sports Team



Blackfoot Bronco Girls Basketball Sports Team

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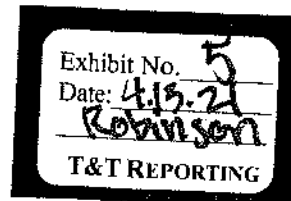


Robert Patten

See more of East Idaho News on Facebook



OR



# Exhibit A

district but I am 100% behind him.

24w · Edited



Most Relevant is selected, so some replies may have been filtered out.

Top Fan

**Marian Fisher Ruzicka** I DO live in Leake's district and attended all the commish meetings then. It was misery on a daily basis. He tried to overpower me when I spoke at meetings. Is that what you want?

24w

**Mimi Mortell Morgan Taylor Bill is a great guy!** :D

24w



Most Relevant is selected, so some replies may have been filtered out.



**Katie Anderson** Good. Chad is a psycho. Anyone else would be an improvement!

24w

Top Fan

**Marian Fisher Ruzicka** Do you folks have a psychology degree? I do, and the man is fair and passionate about citizen rights. And since when is name calling a valid campaign message.

24w



**Ashli Nelson** Katie Danger Anderson Absolute sociopath!

24w · Edited



**Richard Kremer** Christensen is an IFF tool, send him back to their shed. You can do better folks.

24w



**Richard Kremer** Marian Fisher Ruzicka So now I know how you feel.

24w

Top Fan

**Marian Fisher Ruzicka** Richard Kremer - well what doesnt differ is that the court agreed with us against what Leake pushed for and made statue. Further, although I am no scientist, I think there were issues about how he managed INEEL. And we experienced his rule over us....have you?

24w

**Richard Kremer** Marian Fisher Ruzicka opinions differ.

24w

Top Fan

**Marian Fisher Ruzicka** Chad Christensen has well represented us in the past couple of years...not at all like Leake who passed an illegal tax on Teton County residents. We won in the lawsuit citizens stood up for.

24w



**Cassidy Turner** Doesn't sound like Christensen is interested in legislating at all. He just wants to fight the culture war, which he

## Recent Post by Page



**East Idaho News**  
Today at 2:17 PM

House lawmakers had previous proposed a statewide ban on mask mandat... See More

35

4 Comments 1 Share

Share



**East Idaho News**  
Today at 2:36 PM

Under the potential law, the governor would still be able to declare... See More

13

Share



**East Idaho News**  
Today at 1:27 PM

President Joe Biden released a \$1.5 trillion wish list for his first... See More

30

19 Comments 1 Share

Share

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or





# Exhibit A



Top Fan

Marian Fisher Ruzicka I see you folks are trying to bully chad. Is that a wise campaign strategy? Chad had a overwhelming victory the last time...and that is because he represents the voice of the people.

24w



Ron Folsom Please vote for Bill Leake! Put someone with a rational mind back in this seat! #VOTELEAKE

24w



Kim Jardine-Dickerson Bill Leake is honest an intelligent. He is a great candidate

24w



JJ Johnson I hope Bill wins! Chad is an arrogant, lying, self serving pos. He needs to go

24w



David M Smith I have known Bill Leake for many years, and I believe he would be an outstanding legislator. Whereas, I am embarrassed to admit I voted for Christensen. He is not a true Republican and should go find his own party. He gives real Republicans a bad name.

24w



Top Fan

Marian Fisher Ruzicka David Smith - Chad is a true Republican and I am proud of the things he stands for. He is a welcomed return to Republican values instead of rino ones.

24w



David M Smith David Hoffman I also pack

24w



Dustin Parkinson Dan Roberts amen! Well said! And I second your comment!

24w



David Hoffman Dan Roberts I am not an expert on these men. I have been in Christensen's State House Office. He has an AR-15 pic on the wall and he is definitely packing which is how it should be.

24w



Top Fan

Linda Carter Beck David M Smith dang you voted for Chad before

24w



Dan Roberts David M Smith you mean like the higher tax hiking, don't believe in the second amendment, capitulate to pro choice groups types of republicans?

No thanks I'll take a firebrand any day over the weak sauce Rhinos we have had in the past.

24w

See more of East Idaho News on Facebook



or



# Exhibit A



**David Lyboit** We must VOTE CHRISTENSEN OUT.

24w



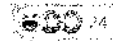
**Michael Ricks** Go KKrumpK

24w



**CoDele Lurker** Chad Christensen is a solid Constitutionalist. He's courageous and will stand when others disguise their true identities. He is transparent and doesn't hide behind fake profiles and fake conservative groups like the Idaho Conservatives. But Gregory Graf could tell everyone all about that. I'm grateful Chad continues to represent actual conservatives.

24w



^ Hide 12 Replies

Most relevant is selected, so some replies may have been filtered out.



**Marla Stuart** oh please, get a new cult

24w



**Marla Stuart** Dustin L. Searle We need 9 more just like her.

24w



**Marla Stuart** Dustin L. Searle Since you don't have any?

24w



**Marla Stuart** Dustin L. Searle conservative morals or ideals? Such as?

24w



Top Fan

**Gregory Graf** EmmaLee Hammon Robinson Respectfully are you asking for yourself or for Chad? I'm happy to have a detailed conversation with you about this offline, that would be fair to Chad.

24w · Edited



Top Fan

**Gregory Graf** EmmaLee Hammon Robinson Eric Parker (famous for being the Bundy bridge sniper), the leader of the Idaho 11% militia was there with Chad that day. I was informed by a state legislator that Parker's group was waiting for me in the parking lot to confron... See More

24w · Edited



**CoDele Lurker** Gregory Graf all I know is you founded a fake conservative Facebook page where you block anyone who questions if it's actually conservative. And you came out of the gate on this article to attack a true conservative. Weird.

24w · Edited



**Melissa Webster** Amen

24w



**Gregory Graf** CoDele Lurker also I'll tell you what's creepy and stalky... Chad showing up with his militia buddies at

See more of East Idaho News on Facebook



or



# Exhibit A



24w · Edited

**Gregory Graf CoDele Lurker** I started that page three years ago. They do excellent work and have published multiple well researched and factual articles exposing the far right network in Idaho. Nothing fake about telling the truth, I'm not sure why you have a proble... See More

24w · Edited

**CoDele Lurker** Gregory Graf obsession is your creepy and coordinated attack/stalking of Chad Christensen. Scroll up. So are you not affiliated with the Facebook page Idaho Conservatives?

24w

**Gregory Graf CoDele Lurker** It's interesting that you attack a private citizen who has nothing to do with this race and lie about me being a "fake conservative".

I don't know you, and your obsession with me is more than a little creepy.

24w

Most Relevant is selected, so some replies may have been filtered out.

**Cheryl Smith O'Connell** I am not from Teton county but I do know that his interest is Teton County! He is a very invested member of the community!

24w

**Mindy Winterhawk** I CAN AND WILL BE VOTING FOR CHAD!!

24w

**Justin Bissette** Chad Christensen all day everyday...

24w

**Summer Ockander** #chadchristensen\_ETW

24w

**KevinLori Fredrickson** Chad 100%

24w

↳ 1 Reply

**Troy Killpack** Scary

24w

**43rd State Blues** Wow, Bill Leake is a quality candidate and a veteran. A flea bitten chihuahua with a palsy condition would be more qualified than MaxiChad Christensen. He's come a long way since those criminal charges in North Dakota for illegally pumping fracking waste. That guy can't pour water out of a boot

See more of East Idaho News on Facebook



or



# Exhibit A

1 Reply



Top Fan

Marian Fisher Ruzicka Bill Leake enacted an illegal tax on Teton County residents...plain and simple. Chad Christensen didnt. Isnt it just this simple? And when up for re-election, Harley Wilcox won by a landslide. That is pretty simple too to understand. The people had spoken and Leake didnt listen.

24w · Edited



Clarence Clearwater If Covid hasn't effected voters IQ, it shouldn't be much of a challenge given what Democrats have promised to perpetrate on our society.

24w



Gregory Graf Few people are more intolerable and dishonest than Rep. Christensen.

He is a leader of Idaho's anti-government III% militia.

Let's not forget that members of Michigan's III% militia were caught plotting to kidnap their Governor and kill police. I have yet to hear Chad disavow the actions of his far right militia brothers in arms who like him repeatedly called their Governor a "tyrant".

It's no surprise Chad is very close friends with Ammon Bundy.



24w



Gregory Graf Dustin L. Searle Quote from one of many news sources in this: "The affidavit alleged the Wolverine Watchmen collaborated with the "Michigan III%ers," a group described by the Anti-Defamation League as "anti-government extremists who are part of the militia movement." The group takes it... See More



BRIDGEM.COM

Whitmer Kidnap Case | Five men set to stand trial in the case

24w



Gregory Graf Gregory Graf Chad is proudly wearing his Idaho III% militia shirt while cuddling with alleged domestic terrorist Ammon Bundy.

24w



Gregory Graf Just a reminder to all that Chad Christensen is a member of the Idaho III% militia. This is the kind of dangerous anti-law enforcement posts his group would make on Facebook.

See more of East Idaho News on Facebook



or



# Exhibit A

home security from Wisconsin's kitchen sink



24w



↳ 5 Replies



**Roxane Jones** Maxi Chad is a poor representative, unless you yourself are some type of fringe lunatic. He is narcissistic and just drives around looking for crap to gripe about so he can be the center of attention. Lousy representative!

24w



**Russell Boyer** Real classy Chad Christensen to post text messages on here between you and someone else. I consider that a private conversation. Did you ask Kelsey Jo for her permission to post that? I guess nothing is sacred to you? Just like you have to post about people's insurance business.

24w



↳ 1 Reply



**Mike Bondio**



24w



↳ 1 Reply

Most Relevant is selected, so some comments may have been filtered out.

See more of East Idaho News on Facebook



or



1:39

Exhibit A

LTE

New Message

Cancel

To: Greg Pruett

Text Message  
Sat, Oct 31, 4:32 PM

Hi Greg this is EmmaLee. I don't have confidence that Chad my feels. You don't have permission to she what I recorded.

Sun, Nov 1, 1:48 PM

Hey EmmaLee, sorry for the delay in responding. We had a rally at the capitol yesterday, in law's are in town, and then Halloween stuff.

Was gonna give you a call tomorrow and chat with you. I do want to apologize about the Tony Lima thing. I didn't realize he was one of the names you had wanted to be bleeped out. That was my fault and I apologize.

No it's good. We can chat tomorrow. I don't know you very well. I have another lawsuit going on right now and it's been a little too much.

I don't know you as well. I do trust Chad. You and I were both named



Text Message



Exhibit No. 6  
Date: 4.13.21  
Robinson  
T&T REPORTING

New Message

Cancel

To: Greg Pruett

No it's good. We can chat tomorrow. I don't know you very well. I have another lawsuit going on right now and it's been a little too much.

I don't know you as well. I do trust Chad. You and I were both named on the c&d. Normally if I'm named on a c&d I'd like to know the person and their intentions.

I'm over the insurance and financial advisors PAC and grassroots position. I have to keep relationships beyond this. My other lawsuit is will have Tony and Adam as whitenesses. I have a lot going on. Let's talk tomorrow.

Sun, Nov 1, 3:46 PM

Totally understand. Let me know what time is good for you and we can chat. I wouldn't worry about this C&D. Graf has no case and would be a complete idiot to even try.

The discovery of his laptop in that case would make it much worse for



Text Message



Apple Pay



New Message

Cancel

To: Greg Pruett

Sun, Nov 1, 3:46 PM

Totally understand. Let me know what time is good for you and we can chat. I wouldn't worry about this C&D. Graf has no case and would be a complete idiot to even try.

The discovery of his laptop in that case would make it much worse for him.

Bryan told me he will defend either of us for free and told me two days ago there isn't a chance Graf will do it.

He is likely already been fired or given a severance. Just based on what I am hearing. Frank VanderSloot will protect his company name and he should. Graf trying to come after us only makes that worse.

Anyway, let me know a time and I will call. Have a good day.



Text Message





## Exhibit A

**EmmaLee Robinson**

---

**From:** EmmaLee Robinson  
**Sent:** Tuesday, October 27, 2020 8:46 PM  
**To:** 'Stephanie Mickelsen'  
**Subject:** RE: Chad Christensen



Hi,

I have heard so much wonderful things about you too. I think we have similar friends. This is why I wanted to reach out to you and your organization.

When I have been told by a few people that you shared personnel files with them, it did seem very off. Honestly I didn't want to get into any past or blame game. I just felt it was the right thing to do to let you know your name and organizations name was being used. I didn't want to get into the rest. Chad and I really haven't talked about you or past history. Sorry, I saw some things on his page, but never looked into it. When we talked it had more to do with future goals and aspirations not the past.

When concerns were brought to me, I went to my all female office to see if they had seen anything off. I like my office to be a safe spot for my employees, and have several with sensitive pasts. They work with him more than I do. They have loved working with him. He never has made them uncomfortable. My office manager even told me a time when our client was trying to be funny about finally having a man in here to get us inline. She was so impressed that Chad stopped him and told him he chose to come here to learn from the best in the industry and sex has nothing to do with our ability to do a job. They were very upset by the accusations, not all from you or your organization but others. They have loved having him here and have felt nothing but safe around him.

The information that was received about your PAC was given to me and me alone. I only told Chad about it on Friday. He was not very emotional, angry or sad, from what I said. He just said he has people that won't stop to try and hurt him. He never went into details of what that was. The PAC I serve on probably wouldn't support him either. Chad and I have joked about this a lot. I am sorry I don't have the same experiences you have had, and I am not one who focuses on the negative. There is too much good that needs to be done, and I believe that it starts with how I handle day to day things. Yes he fought against my bill. The best four letter words in business and politics is NEXT. I moved onto other things. It is okay with me that everyone doesn't agree with me.

I completely understand talking to close personal friends. We have to have our tribe. I really appreciate you telling me this. It came to me as facts from the person who knew the "true" story why Chad got fired. Now I see that suppositions are not truth, and could have been taken the wrong way. That is why I took the recording to my legal counsel and followed the steps they gave me. When I have been told I hired a sexual predator, I was very concerned.

I really didn't mean to bring up hard feelings from the past. When I spoke to Chad about it and he gave me a one sentence response, I didn't realize this was a long and uncomfortable situation for both of you. I am truly sorry to bring something up that is obviously hard for you. I just wanted to let you know, because that is something I would have wanted if things were said about me. I didn't know or understand the all the details.

I also try to live and serve in my community every day. I moved back to Idaho Falls four years ago. My parents have owned several successful businesses in the area and taught me the importance of leaving a positive impact in the community where I live and serve. This philosophy of service has really shaped me into the person and business owner I am today. When your name was brought up by your friends, I recognized it but didn't know from where. I am actually the board chair who inherited the very difficult White Pine School situation. I had saw you had shared the article that came out about it, but I didn't know your connection to the school so your name had stuck with me. Obviously you

## Exhibit A

probably know my name but didn't put two and two together. I would love to meet you in person someday. It seems like we align a lot on our community involvement.

Again, I am so sorry for causing hard feeling. I didn't know the full past.

In Your Service,

---

**EmmaLee Robinson**  


**From:** Stephanie Mickelsen [mailto:sjwmick@gmail.com]  
**Sent:** Monday, October 26, 2020 7:57 PM  
**To:** EmmaLee Robinson <emmalee.robinson.eu22@statefarm.com>  
**Subject:** [EXTERNAL] Re: Chad Christensen

EmmaLee,

I serve on the State Farm Bureau Board and I'm not directly involved with hiring or firing of employees. Chad has politically had it in for me. He received some inside information about a Political Action Committee (PAC) that I serve on that was supposed to be confidential. The PAC had originally not given him money and he was told I was to blame. He posted several things about me at that time. I don't think any credible organization should be giving money to a candidate that doesn't feel the rule of law is important or that women should be valued. The decision that was made was by a group of about 20 people of which I am only 1 vote.

How I got brought into his online rants or received the blame for him being discharged boggles my mind. Chad belongs to a group of people that believe they corner the market on being "true conservatives". They try to cause as much disruption as possible and feel the law only applies to them if it fits their needs.

Chad needs to take a hard look in the mirror and take responsibility for his social media posts and rants about tearing down tyranny, getting the governor recalled, supplying women with feminine products, etc., etc., etc. I have never ever seen his personnel file and can only imagine what really got him fired. Any personal comments I made to a few of my personal friends were suppositions on my part.

I try to live my life each and every day to serve my community. My actions speak volumes as do Chad's. I've worked hard with my husband of 33 years to make our farming business a success. I've raised 4 children and have 10 grandchildren that inspire me to try to make my community a better place. Chad can do and say whatever he pleases. His beef with me is more a figment of his imagination rather than any actual action on my part.

I hear you are a wonderful person and I truly wish you the best.

Sincerely,

Stephanie Mickelsen  
(208)709-1295

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---

## Exhibit A

**From:** EmmaLee Robinson <[emmalee.robinson.eu22@statefarm.com](mailto:emmalee.robinson.eu22@statefarm.com)>

**Sent:** Friday, October 23, 2020 2:14 PM

**To:** Stephanie Mickelsen

**Cc:** Bryan Searle; [ddurrant@idahofb.org](mailto:ddurrant@idahofb.org); [brent.hunter@idfbins.com](mailto:brent.hunter@idfbins.com); [todd.argall@idfbins.com](mailto:todd.argall@idfbins.com)

**Subject:** Chad Christensen

Hi,

I would like you to know that I am the person who hired Chad after you guys let him go. I don't want any ill feelings or difficult situations. I am just going to be direct and blunt about a few things. There have been a few things that now affect all of us, and not to cast blame I thought I would email everyone giving them the benefit of the doubt.

I am the PAC and Grassroots seat for NAIFA Idaho, but I try to leave political things out of my personal office. Chad's son and my son played on the same baseball team this summer. It would be safe to say that he and I do not always align politically. We both chose to not let it affect the time we spent together cheering on our sons. During this time we became friends and started joking about our political differences. He told me he was thinking about going into insurance. I shared how much I have loved this occupation. I had nothing but wonderful things to say about Farm Bureau. My parents were long time clients while I was living in another state. When Chad relationship didn't work out with you, I offered to let him try State Farm.

There are a few things that have been very concerning over the past few days. Instead of making assumptions that everything I have been told is true, I felt it was best to go right to the source. I had a conversation with Greg Graf and Jennifer Ellis about Chad. They reached out to me about the dangerous employee I hired. They never wanted me to fire him, but just to let me be aware. This later turned to giving me strategies to get him out of my office. I do need to let you know that one of the conversations was recorded where you, Stephanie was discussed sharing his personnel record. During these conversations they explained to me that they are very close to you Stephanie, and you have shared with them the real reason Chad was fired. I was told that he was let go for two reasons. First because of his construction company and a post that was made during the hail storm. I guess he said that he could get denied claims over turned. Since now he is an agent, that would be considered fraud or easy to commit fraud. Well I got almost 10 over turned where mistakes were made. I am very confident I didn't commit fraud. The second reason was because you tried to transfers someone into his book of business, because as we all know you cannot build a book and be successful from with no book. This individual was very upset and didn't want to be in Chad's book. I started without a book and have built a large book over the past four years. I have had clients that didn't align with me either. The best four letter word in business is NEXT. You move on.

After speaking to my legal counsel, I just wanted to let you know that these rumors about all of you are going around the political arena and in the insurance community. I don't need to know if this is true or not. I do not want to know the reason he was let go. I just felt it would be a professional courtesy to come to you personally. It appears to other people that you are using someone's personnel record to the public for political gain or advantage. I honestly don't want any problems, and felt it would be best to address you all personally.

In Your Service,

---

**EmmaLee Robinson**

780 N Holmes Ave

Idaho Falls ID 83401

business: 208-522-7773 | fax: 208-522-7783

[emmalee@emmaleerobinson.com](mailto:emmalee@emmaleerobinson.com)

[emmaleerobinson.com](http://emmaleerobinson.com)

If this communication is securities related, see the [additional disclosures](#).



Exhibit A

State Farm Mutual Insurance Company, 100 State Street, Hartford, CT 06183

Dear Mr. [Name]:

I am writing to you regarding the [Subject] matter. The information provided to me indicates that [Details]. It is important that we resolve this matter as quickly as possible to avoid any further complications.

I have reviewed the documents and the facts of the case. It appears that there may be a misunderstanding or a clerical error. I am confident that we can reach a mutually agreeable resolution.

Please contact me at [Phone Number] or [Email Address] if you have any questions or need further information. I am available during business hours, Monday through Friday.

Sincerely,  
[Name]  
[Title]

On this [Date], I received your letter regarding the [Subject] matter. I appreciate your prompt response and the information provided. I am currently reviewing the details and will get back to you as soon as possible.

The information you provided is being reviewed by the appropriate departments. I will ensure that all necessary steps are taken to address your concerns. Your patience is appreciated.

I am committed to providing you with the best possible service and resolution. I will contact you again once a final decision has been reached.

Thank you for your understanding and cooperation.

Sincerely,  
[Name]  
[Title]

I am sorry that I cannot provide a more definitive answer at this time. The complexity of the situation requires further investigation. I will keep you updated on any developments.

Your feedback is valuable, and I will take it into consideration as we work towards a resolution. I am confident that a fair and equitable solution will be reached.

Please do not hesitate to reach out if you have any additional questions or concerns. I am here to assist you.

Very truly yours,  
[Name]  
[Title]

I am writing to you regarding the [Subject] matter. The information provided to me indicates that [Details]. It is important that we resolve this matter as quickly as possible to avoid any further complications.

I have reviewed the documents and the facts of the case. It appears that there may be a misunderstanding or a clerical error. I am confident that we can reach a mutually agreeable resolution.

Please contact me at [Phone Number] or [Email Address] if you have any questions or need further information. I am available during business hours, Monday through Friday.

Sincerely,  
[Name]  
[Title]



Stephanie Jo Mickelsen

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Stephanie Jo Mickelsen

May 5 · 🌐



For a great man with integrity vote for Kevin Cook Senate District 30.



# Exhibit A

**In The Matter Of:**  
*CHRISTENSEN vs.*  
*GRAF, et al.*

---

*CHAD CHRISTENSEN*  
*August 01, 2023*

---

*T&T Reporting, LLC*  
*477 Shoup Avenue, Suite 105*  
*Idaho Falls, Idaho 83402*  
*(208) 529-5491*

Page 1

1 DISTRICT COURT SEVENTH JUDICIAL DISTRICT  
2 BONNEVILLE COUNTY IDAHO  
3  
4 CHAD CHRISTENSEN, )  
5 Plaintiff/Counterdefendant, ) Case No.  
6 vs. ) CV10-21-1197  
7 )  
8 GREGORY GRAF, )  
9 Defendant/Counterclaimant/  
10 Third-Party Plaintiff, )  
11 vs. )  
12 GREG PRUETT, an individual; DUSTIN  
13 HURST, an individual; and EMMALEE  
14 ROBINSON, an individual, )  
15 Third-Party Defendants. )

15 DEPOSITION OF CHAD CHRISTENSEN  
16 Tuesday, August 1, 2023, 1:37 p.m.  
17 Idaho Falls, Idaho

19 BE IT REMEMBERED that the deposition of Chad  
20 Christensen was taken by the attorney for the  
21 defendant at the office of Beard St. Clair Gaffney,  
22 located at 955 Pier View Drive, Idaho Falls, Idaho,  
23 before Sheila T. Fish, Court Reporter and Notary  
24 Public, in and for the State of Idaho, in the  
25 above-entitled matter.

25 Reported by: Sheila T. Fish, CSR #906, RPR, CRR

Page 2

1 A P P E A R A N C E S  
2  
3 For the Defendant Gregory Graf:  
4 BEARD ST. CLAIR GAFFNEY  
5 BY: JARED W. ALLEN  
6 955 Pier View Drive  
7 Idaho Falls, Idaho 83402  
8 (208) 523-5171  
9 Allen@beardstclair.com  
10  
11 For the Plaintiffs:  
12 DINDINGER & KOHLER, PLLC  
13 BY: EDWARD W. DINDINGER  
14 1020 West Main Street, Suite 400  
15 Boise, Idaho 83702  
16 (208) 616-5459  
17 Service@dklawboise.com  
18  
19 For the Third-Party Defendant EmmaLee Robinson:  
20 COOPER & LARSEN, CHARTERED  
21 BY: J.D. OBORN  
22 151 North Third Avenue, #210  
23 Post Office Box 4229  
24 Pocatello, Idaho 83405  
25 (208) 235-1145  
26 jd@cooper-larsen.com  
27  
28 For the Third-Party Defendant Dustin Hurst:  
29 SMITH, DRISCOLL & ASSOCIATES, PLLC  
30 BY: BRYAN D. SMITH  
31 414 Shoup Avenue  
32 Post Office Box 50731  
33 Idaho Falls, Idaho 83405  
34 (208) 524-0731  
35 Filing@eidaholaw.com  
36  
37 Also Present:  
38 Greg Pruett  
39 EmmaLee Robinson

Page 3

1 E X A M I N A T I O N  
2  
3 CHAD CHRISTENSEN Page  
4 BY MR. ALLEN..... 4  
5 BY MR. OBORN..... 72  
6 BY MR. DINDINGER..... 73  
7 BY MR. ALLEN..... 76  
8  
9  
10  
11 E X H I B I T S  
12 No. Page  
13 Exhibit 18 Complaint ..... 9  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 4

1 (The deposition proceeded at 1:37 p.m.  
2 as follows:)  
3 CHAD CHRISTENSEN,  
4 produced as a witness at the instance of the  
5 defendant, having been first duly sworn, was examined  
6 and testified as follows:  
7  
8 EXAMINATION  
9 BY MR. ALLEN:  
10 Q. Good afternoon, Mr. Christensen.  
11 A. Hi.  
12 Q. Your last name is a bit of a mouthful.  
13 Do you mind if I refer to you as Chad --  
14 A. Yes.  
15 Q. -- during the course of the deposition?  
16 A. That's fine.  
17 Q. So let the record reflect that this is  
18 the time and place for the deposition of Chad  
19 Christensen, being taken pursuant to Idaho Rules of  
20 Civil Procedure and notice. We'll note for the  
21 record that Mr. Smith, who represents Dustin Hurst,  
22 is not present. It's my understanding that he may  
23 have suggested to counsel that he would not be here.  
24 So we're going to proceed without him at this time.  
25 Mr. Christensen, will you state your



Page 5

1 name and spell your last name for the reporter?  
 2 A. Chad Christensen, C-h-r-i-s-t-e-n-s-e-n.  
 3 Q. Have you ever been deposed before?  
 4 A. Yes.  
 5 Q. When have you been deposed?  
 6 A. Many times. I don't -- I don't remember  
 7 all of the dates. But several times.  
 8 Q. Do you recall the last time?  
 9 A. I believe it was a case regarding an oil  
 10 company in 2018.  
 11 Q. Were you a party in that case?  
 12 A. No.  
 13 Q. Just a witness?  
 14 A. Yes.  
 15 Q. Okay. Do you recall the last deposition  
 16 that you were in prior to that?  
 17 A. Probably 2012.  
 18 Q. Okay. What kind of case was that?  
 19 A. Car accident.  
 20 Q. Were you a party in that case?  
 21 A. Yes.  
 22 Q. Where did that case take place?  
 23 A. Here in Idaho Falls.  
 24 Q. Okay. Sounds like you're fairly  
 25 experienced with the process. Just a quick

Page 6

1 reminder -- and you're doing great so far -- make  
 2 sure that your answers are "yes" or "no," instead of  
 3 "uh-huh" or "uh-uh." That's for her benefit; fair  
 4 enough?  
 5 A. Yes.  
 6 Q. And likewise, you and I need to be  
 7 careful about not talking over each other so that we  
 8 create a clear record. She can't record both of us  
 9 at the same time.  
 10 Okay. If you need a break, let me know.  
 11 We'll take a break anytime you need it, as long as  
 12 there's not a question pending on the table.  
 13 Is there any reason that you cannot  
 14 answer my questions fully and accurately to the best  
 15 of your ability today?  
 16 A. No.  
 17 Q. Are you on any medication or other  
 18 substance that would inhibit your ability to recall  
 19 correctly or give truthful answers?  
 20 A. No.  
 21 Q. Who knows that you're here being deposed  
 22 today?  
 23 A. My wife.  
 24 Q. Anyone else?  
 25 A. No.

Page 7

1 Q. Did you discuss it with your wife?  
 2 A. A little bit, yes.  
 3 Q. What did you talk about?  
 4 A. Last night, talked to --  
 5 MR. DINDINGER: I'm just going to object as  
 6 to spousal privilege.  
 7 But you can go ahead and answer it.  
 8 MR. ALLEN: No, that's fair. I don't want  
 9 to -- I'll respect the privilege. That's totally  
 10 appropriate.  
 11 Q. BY MR. ALLEN: Anybody else you  
 12 discussed it with?  
 13 A. Just told my father that I was being  
 14 deposed. That was all I told.  
 15 Q. Okay. Did you discuss the deposition at  
 16 all with Dustin Hurst?  
 17 A. Yes.  
 18 Q. Okay. When did you and Dustin discuss  
 19 it?  
 20 A. Like I say, I sent a message last --  
 21 during the deposition yesterday.  
 22 Q. Okay. And what did you guys discuss?  
 23 A. Regarding Mr. Graf's outburst.  
 24 Q. Did you discuss this deposition today at  
 25 all?

Page 8

1 A. No.  
 2 Q. Okay. Did you discuss this deposition  
 3 today at all with EmmaLee Robinson?  
 4 A. No.  
 5 Q. And how about with Greg Pruett?  
 6 A. No.  
 7 Q. Okay. Did you review any documents to  
 8 prepare for the deposition?  
 9 A. I have in the past, yes.  
 10 Q. Okay. Tell me what documents you've  
 11 reviewed to prepare for the deposition.  
 12 A. Discovery with messages, and that's  
 13 about it.  
 14 Q. Do you remember specifically what any of  
 15 them were?  
 16 A. Facebook messages between Mr. Graf and  
 17 EmmaLee Robinson.  
 18 Q. Anything else?  
 19 A. No.  
 20 Q. Is that the only one that you  
 21 specifically remember?  
 22 A. Yes.  
 23 Q. Was that the exchange between them in  
 24 Facebook comments or the Facebook Messenger messages?  
 25 A. Messenger.

Page 9

1 Q. Okay. When was it that you reviewed  
2 those?  
3 A. Yesterday during the deposition.  
4 MR. ALLEN: Okay. All right. Let's mark  
5 this next.  
6 (Exhibit 18 marked.)  
7 Q. BY MR. ALLEN: All right. You've been  
8 handed what's been marked as Exhibit 18. Do you  
9 recognize that?  
10 A. Yes.  
11 Q. And what is that?  
12 A. That would be my complaint against  
13 Mr. Graf.  
14 Q. Okay. Turn to the last page, if you  
15 would. There's a verification page. Is that your  
16 signature?  
17 A. Yes.  
18 Q. Okay. Let me have you turn to page 2 of  
19 the document. And starting at paragraph 8 going  
20 through paragraph 16, you lay out some allegations  
21 about Mr. Graf making defamatory statements about  
22 you.  
23 What I would like to have you do is read  
24 through those, and tell me if there is anything else  
25 outside of what is alleged in your complaint that you

Page 10

1 are claiming Mr. Graf said about you that was  
2 defamatory.  
3 MR. DINDINGER: Object as to form and object  
4 as to the extent it requires him to state a legal  
5 conclusion.  
6 But you can go ahead.  
7 THE WITNESS: I can't think of anything else.  
8 Q. BY MR. ALLEN: So as far as you know,  
9 that's everything that you're relying on to support  
10 your claim for defamation?  
11 MR. DINDINGER: Object to the extent it calls  
12 for a legal conclusion.  
13 THE WITNESS: Yes.  
14 Q. BY MR. ALLEN: Okay. That will help  
15 significantly in framing the deposition and my  
16 questions.  
17 Let's jump back now and talk about your  
18 background. Where do you presently reside?  
19 A. Ammon.  
20 Q. How long have you lived in Ammon?  
21 A. I live just outside of Ammon. 16 years.  
22 Q. You say just outside of Ammon. So  
23 Bonneville County?  
24 A. Yeah, just south of Ammon. Foothills  
25 area.

Page 11

1 Q. All right. And where did you reside  
2 prior to that?  
3 A. Idaho Falls.  
4 Q. How long were you in Idaho Falls?  
5 A. All my life except for an LDS mission.  
6 Q. Where did you serve your mission?  
7 A. San Diego.  
8 Q. What years were you there?  
9 A. '92 to '94.  
10 Q. Okay. So you grew up here in Idaho  
11 Falls?  
12 A. Yes.  
13 Q. Born here?  
14 A. Yes.  
15 Q. What -- what do you currently do for  
16 work, for a living?  
17 A. Insurance agent.  
18 Q. Sorry. Say that again?  
19 A. Insurance agent.  
20 Q. Okay. And where do you work?  
21 A. Goosehead Insurance.  
22 Q. Say that again?  
23 A. Goosehead Insurance.  
24 Q. How long have you been with Goosehead  
25 Insurance?

Page 12

1 A. It will be a year and four months.  
2 Q. So 16 months, roughly?  
3 A. Yes.  
4 Q. Who owns Goosehead Insurance?  
5 A. They're out of Texas. I don't -- Jim.  
6 I can't remember his last name.  
7 Q. And where did you work prior to  
8 Goosehead Insurance?  
9 A. EmmaLee Robinson's insurance agency.  
10 Q. Okay.  
11 A. And the State of Idaho.  
12 Q. When did you leave EmmaLee Robinson's  
13 insurance agency?  
14 A. That would have been May of '22.  
15 Q. Why did you leave?  
16 A. To pursue my own agency.  
17 Q. So is your relationship with Goosehead  
18 Insurance as an operator of your own agency?  
19 A. Yes.  
20 Q. Okay. Is that under an entity? Have  
21 you formed an entity to operate that, or an LLC?  
22 A. Yes.  
23 Q. What is that?  
24 A. Insurify LLC.  
25 Q. Can you spell that for us?

Page 13

1 A. I-n-s-u-r-i-f-y.  
 2 **Q. Is that an Idaho LLC?**  
 3 A. Yes.  
 4 **Q. Do you recall when it was organized?**  
 5 A. I believe in May of '22.  
 6 **Q. And you indicated that you work for the**  
 7 **State of Idaho?**  
 8 A. Yes.  
 9 **Q. What capacity did you work for the State**  
 10 **of Idaho?**  
 11 A. A state legislator.  
 12 **Q. When did your relationship with EmmaLee**  
 13 **Robinson Insurance start?**  
 14 A. I believe it was the spring of 2020 --  
 15 or '21. '21, I believe.  
 16 **Q. Okay. So you worked there for about a**  
 17 **year?**  
 18 A. Year and a half, I think.  
 19 **Q. And where did you work prior to that?**  
 20 A. Farm Bureau Insurance.  
 21 **Q. How long did you work there?**  
 22 A. A month.  
 23 **Q. Where did you work prior to Farm Bureau?**  
 24 A. I worked -- subcontracted with a  
 25 construction company called Keystone Construction.

Page 14

1 **Q. When did you -- when did you become an**  
 2 **insurance agent?**  
 3 A. August of 2020.  
 4 **MR. DINDINGER:** I'm going to object to that  
 5 just to the extent that the term "insurance agent"  
 6 may be ambiguous. Are you talking about a holder of  
 7 a producer's license or...  
 8 **MR. ALLEN:** Okay. We can clarify that.  
 9 **Q. BY MR. ALLEN: Are you a licensed**  
 10 **insurance agent?**  
 11 A. Yes.  
 12 **Q. What is your license?**  
 13 A. I'm not sure exactly what the -- what  
 14 you mean by -- so you mean my business -- my business  
 15 license?  
 16 **Q. Do you hold a producer's license?**  
 17 A. Yes.  
 18 **Q. Okay. How long have you held that**  
 19 **producer's license?**  
 20 A. Since August of 2020.  
 21 **Q. All right. Is that when you went to**  
 22 **work for the Farm Bureau?**  
 23 A. Yes.  
 24 **Q. And did you go to Farm -- or did you go**  
 25 **from Farm Bureau to working for EmmaLee Robinson?**

Page 15

1 A. Yes.  
 2 **Q. Okay. You said you worked as a**  
 3 **subcontractor to Keystone Construction?**  
 4 A. Yes.  
 5 **Q. What kind of work were you doing?**  
 6 A. Construction repairs, roofing and  
 7 siding, windows. That's about it.  
 8 **Q. Who is Keystone Construction?**  
 9 A. Who are they?  
 10 **Q. Yeah. Is that an -- is that an entity?**  
 11 A. Yes. They're a -- Dan Roberts, that  
 12 owns Lost -- Lost River Log Cabins, I think it's  
 13 called, owns Keystone Construction.  
 14 **Q. Okay. And how long did you subcontract**  
 15 **with them?**  
 16 A. I believe it was a little over two  
 17 years. Since May of '18.  
 18 **Q. May of '18?**  
 19 A. Yes.  
 20 **Q. Are you doing any construction work**  
 21 **presently?**  
 22 A. No.  
 23 **Q. Did you do construction work before**  
 24 **Keystone?**  
 25 A. No.

Page 16

1 **Q. Okay. Is that your first construction**  
 2 **job?**  
 3 A. Yes.  
 4 **Q. Okay. Did you do that work in an**  
 5 **individual capacity, or did you form an entity that**  
 6 **you were working through?**  
 7 A. I formed one but never did any work.  
 8 **Q. You formed one?**  
 9 A. But didn't do any work.  
 10 **Q. What was the name of that entity?**  
 11 A. Iron Rod, LLC. Iron Rod Construction.  
 12 **Q. Okay. When was that entity created?**  
 13 A. I believe in June or July of '20.  
 14 **Q. 2020?**  
 15 A. Yes -- no. Yes, '20.  
 16 **Q. Is that a sole member LLC?**  
 17 A. I believe I put a friend on the LLC.  
 18 **Q. You put a friend on what?**  
 19 A. As a partner on there, because she was  
 20 a -- in construction and knew a lot about it, so...  
 21 **Q. Who was that?**  
 22 A. Melissa -- I can't remember her last  
 23 name right now.  
 24 **Q. She was already in the construction**  
 25 **industry?**

Page 17

1 A. Yes.

2 **Q. What did she do?**

3 A. They build homes, they did insulation,

4 concrete.

5 **Q. When you say "they," who is they?**

6 A. Her and her company. Her father was

7 part of it. I believe her husband was part of it.

8 **Q. What was the name of that company?**

9 A. I don't recall.

10 **Q. So was the intention behind starting**

11 **Iron Rod Construction that the two of you would start**

12 **a construction company doing similar-type work?**

13 A. Yes.

14 **Q. Okay. And you say that it never did any**

15 **business?**

16 A. No.

17 **Q. Okay. Have you started any other**

18 **businesses besides Insurify, LLC, and Iron Rod**

19 **Construction, LLC?**

20 A. I've had my private investigation

21 businesses since 2011.

22 **Q. What's the name of that business?**

23 A. Southeast Idaho Investigations.

24 **Q. Is that still an operating entity?**

25 A. Yes.

Page 18

1 **Q. Any other businesses?**

2 A. No.

3 **Q. What kind of entity is Southeast Idaho?**

4 **Is that an LLC also?**

5 A. Yes.

6 **Q. Okay. From 2011 to 2018, when you went**

7 **to work with Keystone --**

8 A. I'm sorry. What was the date you said?

9 **Q. 2011 is when you said that you started**

10 **Southeast Idaho Investigations?**

11 A. Oh, yes.

12 **Q. From then until 2018, was Southeast**

13 **Idaho Investigations your only line of work, or did**

14 **you do something else?**

15 A. Oh, I did a lot of other things, but

16 that was the main source of income, yes.

17 **Q. Okay. What else did you do during that**

18 **time?**

19 A. Some PSR work, psychosocial

20 rehabilitation. Oil field. That's all I can think

21 of right now.

22 **Q. Where did you do your oil field work?**

23 A. North Dakota.

24 **Q. What kind of work were you doing there?**

25 A. Drove an oil and water truck. Water

Page 19

1 diesel, semi-truck, tanker.

2 **Q. Was that your own truck, or were you**

3 **driving for somebody else?**

4 A. A friend's truck one time, and then MBI

5 for a -- for a part of the time I was there.

6 **Q. For who?**

7 A. MBI Trucking.

8 **Q. MBI?**

9 A. Uh-huh. Missouri Basin something. I

10 was also in the Wyoming oil field for a little bit.

11 **Q. Okay. Prior to 2011, when you started**

12 **Southeast Idaho Investigation, what were you doing**

13 **for work?**

14 A. Working for the state welfare fraud

15 investigations.

16 **Q. Is that the State of Idaho?**

17 A. Yes.

18 **Q. How long did you work there?**

19 A. Four years.

20 **Q. Okay. So that should take us until**

21 **about 2007.**

22 **Do you recall what you were doing prior**

23 **to the state welfare fraud investigations?**

24 A. State Probation & Parole.

25 **Q. How long did you work there?**

Page 20

1 A. Four years.

2 **Q. That gets us back to '03. Do you recall**

3 **what you were doing before Probation & Parole?**

4 A. Jefferson County Probation.

5 **Q. Do you recall who or when you started**

6 **there?**

7 A. It was the first part of '01, like, I

8 think, March.

9 **Q. So you were there for about three years**

10 **or about two years?**

11 A. Yeah. Two. Yes.

12 **Q. And where were you before that?**

13 A. Behavioral Health Center at EIRMC.

14 **Q. What did you do for BHC?**

15 A. Worked with state-committed adolescents.

16 I was one of the group leaders.

17 **Q. How long did you do that?**

18 A. I believe two years as well.

19 **Q. Okay. And what did you do before that?**

20 A. I worked at -- was going to college,

21 worked at Challenger Pallet Supply during that time.

22 **Q. Was your position at BHC your first**

23 **post-college job?**

24 A. I would say so, yes.

25 **Q. Okay. Where did you go to college?**

Page 21

1 A. Ricks College and ISU.  
 2 **Q. What years were you at Ricks College?**  
 3 A. First semester '91, first semester. And  
 4 then '92 to '94. I mean, no, I'm sorry, no. '94 to  
 5 '96.  
 6 **Q. And you said ISU?**  
 7 A. Yes.  
 8 **Q. Did you get a degree from Ricks?**  
 9 A. Yes.  
 10 **Q. Associate's in?**  
 11 A. Criminal justice.  
 12 **Q. And from ISU?**  
 13 A. Yes, bachelor's in political science,  
 14 prelaw.  
 15 **Q. You graduated from Rick's in '96?**  
 16 A. Yes.  
 17 **Q. And when did you graduate from ISU?**  
 18 A. About -- I believe it was '99.  
 19 **Q. Okay. You said that you were working**  
 20 **for Challenger Pallets --**  
 21 A. Yes.  
 22 **Q. -- during college?**  
 23 A. Challenger Pallet Supply.  
 24 **Q. Okay. All right. Let's work back the**  
 25 **other direction now.**

Page 22

1 **So you finished college and you went to**  
 2 **work for EIRMC. Do you recall who your supervisor**  
 3 **was at EIRMC?**  
 4 A. I don't.  
 5 **Q. Okay. Do you recall why you left EIRMC?**  
 6 A. To do probation, pursue law enforcement  
 7 more.  
 8 **Q. Okay. How about at Jefferson County?**  
 9 **Do you recall who your supervisor was?**  
 10 A. Tammy Adkins.  
 11 **Q. Tammy Adkins?**  
 12 A. Yes. I guess you should put in this  
 13 employment period Army Reserve as well, but that's...  
 14 **Q. Do you recall why you left Jefferson**  
 15 **County Probation?**  
 16 A. To go to -- to keep pursuing my career  
 17 and advance to State Probation & Parole.  
 18 **Q. Okay. Who was your supervisor at State**  
 19 **Probation & Parole?**  
 20 A. Terry Kirkham.  
 21 **Q. And why did you leave that position?**  
 22 A. I was terminated.  
 23 **Q. What was the reason for that**  
 24 **termination?**  
 25 A. I was in charge of Fugitive Recovery

Page 23

1 Unit and they deemed that I was too -- I guess,  
 2 "mean" was the word for it -- to the fugitive. Too  
 3 "harsh," I guess, was the official word that they  
 4 used.  
 5 **Q. Tell me what happened that resulted in**  
 6 **that termination.**  
 7 A. So I was trained by the previous guy in  
 8 charge of fugitive recovery. And he would tell me to  
 9 frustrate the fugitive in all ways possible,  
 10 including calling their cell phones that they are  
 11 using for -- the drug phones we believe were drug  
 12 phones that were used to do drug deals. And I would  
 13 leave messages, just play music, whatever, just tie  
 14 it up. And apparently one of the songs was a -- was  
 15 a song they deemed a violent song. I just played the  
 16 radio when I was out doing work, so it just came on.  
 17 I didn't intentionally use that song. But a fugitive  
 18 used that song to say I threatened his life. I  
 19 didn't threaten his life. But then the department  
 20 decided that it was too aggressive or too...  
 21 **Q. Okay. So they let you go. You went to**  
 22 **work to the state welfare fraud investigations firm?**  
 23 A. Yes.  
 24 **Q. Okay. Who was your supervisor there?**  
 25 A. I can't remember her name at first. I

Page 24

1 wasn't there very long. But the one above her was  
 2 named Monie (phonetic), and he was gone soon too.  
 3 And after that was Ben Johnson for the -- most of  
 4 time that I was there.  
 5 **Q. Okay. And why did you leave there?**  
 6 A. What's that?  
 7 **Q. Why did you leave there?**  
 8 A. I resigned.  
 9 **Q. Why did you resign?**  
 10 A. I knew that I didn't want to be there.  
 11 I felt like I couldn't do my job as I -- I found  
 12 internal fraud, and they didn't want to deal with it.  
 13 And, of course, they started to come down on me, I  
 14 believe, so I didn't want to be there anymore.  
 15 **Q. Okay. How quickly after leaving state**  
 16 **welfare did you go to the oil fields?**  
 17 A. I left in '11. So I went to oil fields  
 18 in '13. Two years.  
 19 **Q. So when you left state welfare, did you**  
 20 **immediately start your PI business?**  
 21 A. Yes.  
 22 **Q. Okay. And that's a going concern today,**  
 23 **right? Did I understand that correctly, that you're**  
 24 **still doing that business?**  
 25 A. Yes.

Page 25

1 **Q. How much of your time is spent, would**  
 2 **you say, between that and your insurance business at**  
 3 **the present?**  
 4 A. Probably 30 percent PI work, 70 percent  
 5 insurance.  
 6 **Q. Okay. Is that a business where -- the**  
 7 **PI business, is that a business where you have a**  
 8 **particular set of customers that you work with, or is**  
 9 **it just whoever happens to call?**  
 10 A. Whoever happens to call. I do get law  
 11 firms, mostly.  
 12 **Q. Okay. Is that mostly domestic-related**  
 13 **investigations or mostly other stuff?**  
 14 A. Mostly -- I would say mostly that and  
 15 auto insurance, fraud stuff for workmen's comp.  
 16 **Q. Now, you said that you were also in the**  
 17 **Guard during this time frame; is that correct?**  
 18 A. Reserves. Same thing, a little  
 19 different.  
 20 **Q. Reserves. Army Reserves?**  
 21 A. Yes.  
 22 **Q. Okay. When did you join the Army**  
 23 **Reserves?**  
 24 A. It would be March of '01.  
 25 **Q. Was that after a period of active duty?**

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1 A. No.  
 2 **Q. So you joined as a reservist?**  
 3 A. Yes.  
 4 **Q. Okay. And you were there -- you started**  
 5 **in '01?**  
 6 A. Yes.  
 7 **Q. How long did you continue as a**  
 8 **reservist?**  
 9 A. I left in June of '13.  
 10 **Q. And why did you leave the Reserves?**  
 11 A. Medical reasons.  
 12 **Q. Was that a service-related injury?**  
 13 A. No.  
 14 **Q. Okay. All right. Are you currently --**  
 15 **well, you said that you talked to your wife about the**  
 16 **deposition. So you are currently married. Who is**  
 17 **your wife?**  
 18 A. Lana Christensen.  
 19 **Q. And how long have you and Lana been**  
 20 **married?**  
 21 A. November of last year.  
 22 **Q. November of '22?**  
 23 A. Yes.  
 24 **Q. Were you previously married before Lana?**  
 25 A. Yes.

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1 **Q. How many times?**  
 2 A. Twice.  
 3 **Q. And who were your prior spouses?**  
 4 A. Do you want their maiden names or  
 5 their --  
 6 **Q. Preferably whatever their current name**  
 7 **is.**  
 8 A. Current name is Stephanie Reed.  
 9 **Q. Is she your first wife?**  
 10 A. Second.  
 11 **Q. Second.**  
 12 A. First wife is Lisa Ezell.  
 13 **Q. Spell that last name?**  
 14 A. E-z-e-l-l.  
 15 **Q. When were you married to Lisa?**  
 16 A. December of '96 to March of '05.  
 17 **Q. And she was your first wife, correct?**  
 18 A. Yes.  
 19 **Q. Okay. And why did the two of you get**  
 20 **divorced?**  
 21 A. Just fell apart, I guess. Just no -- no  
 22 real big reason.  
 23 **Q. Who filed?**  
 24 A. She did.  
 25 **Q. Okay. And when were you married to**

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1 **Stephanie?**  
 2 A. July of '16 to January of '20.  
 3 **Q. And why did you and Stephanie get**  
 4 **divorced?**  
 5 A. Well, she lived in Texas and we planned  
 6 to get united eventually, but that didn't work out.  
 7 So that just kind of ended.  
 8 **Q. You didn't want to go there, she didn't**  
 9 **want to come here?**  
 10 A. Pretty much.  
 11 **Q. Okay. Do you have children?**  
 12 A. Yes.  
 13 **Q. How many?**  
 14 A. Two.  
 15 **Q. What are their names and ages?**  
 16 A. Ryan Christensen. He is 23. Cooper --  
 17 Cooper Christensen is 15.  
 18 **Q. Ryan is 23?**  
 19 A. Yes.  
 20 **Q. Cooper is 15?**  
 21 A. And I have stepkids too.  
 22 **Q. Okay. Who is Ryan's mother?**  
 23 A. Lisa Ezell.  
 24 **Q. And who is Cooper's mother?**  
 25 A. Her name is Heidi Diamond.

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1 Q. Let's see. You said that he's 15. So  
2 he would have been born in '08?  
3 A. '07.  
4 Q. '07. He's almost 16?  
5 A. Yes.  
6 Q. So he was born between the relationship  
7 or between your marriage to Lisa and your marriage to  
8 Stephanie?  
9 A. Yes.  
10 Q. Okay. Was Heidi a girlfriend at the  
11 time?  
12 A. Yes.  
13 Q. Did you have any other girlfriends  
14 either -- well, let's say between Lisa and Stephanie,  
15 besides Heidi Diamond?  
16 MR. DINDINGER: Objection as to relevance.  
17 Not reasonably calculated to lead to the discovery of  
18 admissible evidence.  
19 Go ahead, Chad.  
20 THE WITNESS: Melanie -- Melanie Fowler was  
21 her name.  
22 Q. BY MR. ALLEN: When did your  
23 relationship with Heidi Diamond start?  
24 A. It would be June of '05.  
25 Q. So right after your divorce?

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1 A. Yes.  
2 Q. How about your relationship with Melanie  
3 Fowler?  
4 A. Sometime in 2012.  
5 Q. That's when it started?  
6 A. Yes.  
7 Q. Okay. When did it end?  
8 A. Two years later, approximately.  
9 Q. And your relationship with Heidi Diamond  
10 ended when?  
11 A. That would be August of 2010.  
12 Q. Any girlfriends, significant others,  
13 between Heidi and Melanie?  
14 A. I don't recall right -- I don't think  
15 so.  
16 Q. Okay. How about between Stephanie and  
17 your marriage to Lana?  
18 A. I mean, I dated but no -- nobody  
19 significant.  
20 Q. Okay. None that you would call  
21 significant relationships?  
22 A. No.  
23 Q. Did you have a dating relationship with  
24 Melissa who owned -- or who owned Iron Rod  
25 Construction with you?

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1 A. For about a month, yes.  
2 Q. When was that?  
3 A. She told me she was getting divorced, I  
4 believe, in June of '20. I told her that I wanted to  
5 wait until she was divorced, and she affirmed she --  
6 it was.  
7 Q. So that was about the same time that you  
8 were starting the business?  
9 A. Yes.  
10 Q. Why did that relationship end?  
11 A. Because I found out she wasn't actually  
12 divorced yet. So I stopped it.  
13 Q. Of these relationships that you've  
14 identified, two marriages, were any of these  
15 relationships not sexual in nature?  
16 A. Melissa.  
17 Q. Okay. Okay. And during this same time  
18 frame, starting from your relationship with Lisa in  
19 December of '96, I think that you said, through the  
20 present, are there any other women with whom you've  
21 had sexual relationships?  
22 MR. DINDINGER: Objection as to relevance,  
23 vexatious and harassing.  
24 Go ahead, Chad.  
25 THE WITNESS: Probably four or five.

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1 Q. BY MR. ALLEN: Can you tell me who they  
2 are?  
3 A. One is named Lorie. Her maiden name is  
4 Quilling. I don't know her current name.  
5 Q. Quilling?  
6 A. Yes. Jamie Marboe. I can't recall her  
7 name.  
8 Q. Those are the only two that you can  
9 specifically recall their names?  
10 A. Yes.  
11 Q. And there were two or three others?  
12 A. Yes.  
13 Q. Okay. How long did your relationship  
14 with Lorie Quilling last?  
15 A. Probably three months.  
16 Q. How about your relationship with Jamie  
17 Marboe?  
18 A. About the same.  
19 Q. Did either of your prior wives ever  
20 accuse you of infidelity?  
21 A. No.  
22 Q. Were you ever unfaithful?  
23 A. No.  
24 Q. All right. Let's shift gears a little  
25 bit.

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1           **You mentioned being employed by the**  
2 **state as a state legislator. When were you first**  
3 **elected to the state legislature?**  
4       A. November of '18.  
5       **Q. How did you first become involved in**  
6 **politics?**  
7       A. When I ran for sheriff in 2012. That's  
8 basically the first time I got started.  
9       **Q. So in terms of your law enforcement**  
10 **experience, you were with state probation -- or**  
11 **excuse me, Jefferson County Probation and State**  
12 **Probation & Parole.**  
13       **Would you characterize your state**  
14 **welfare fraud investigations position as a law**  
15 **enforcement position?**  
16       A. Yes.  
17       **Q. Have you ever applied for any other law**  
18 **enforcement positions?**  
19       A. Blackfoot Police and Idaho Falls Police.  
20       **Q. When did you apply for Blackfoot PD?**  
21       A. That would be soon -- soon that I  
22 applied -- let me think of the year. It would be '07  
23 or -- the first of '07 or end of '06. One of those.  
24 It was after I was terminated from probation and  
25 parole, looking for jobs.

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1       **Q. Was it -- okay. You said it was around**  
2 **2007. Were both of those around that same time?**  
3       A. Yes.  
4       **Q. And did you interview for positions with**  
5 **either of them?**  
6       A. Yes.  
7       **Q. Did you obtain an offer from either of**  
8 **them?**  
9       A. Blackfoot said no. Idaho Falls was  
10 going to -- I believe they were, but I decided to go  
11 with the state again to keep my retirement going.  
12       **Q. Did you interview with Blackfoot?**  
13       A. Yes.  
14       **Q. And they just turned you down?**  
15       A. Yes.  
16       **Q. Did they tell you why?**  
17       A. Because they saw my probation and parole  
18 file, and they didn't like what they saw, they said.  
19       **Q. Did they tell you that or just --**  
20       A. That's what they told me, yes.  
21       **Q. Okay. Did they tell you what it was**  
22 **they didn't like?**  
23       A. I told them the whole story of how I got  
24 terminated, and they said that they saw something to  
25 do with that process. They didn't say exactly what

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1 it was.  
2       **Q. Okay. So you ran for sheriff in 2012?**  
3       A. Yes.  
4       **Q. Do you recall who your opponent was?**  
5       A. Paul Wheeler. And there was two others.  
6 Randy Neal, current prosecutor, and Terry something.  
7 I don't remember his last name. There were four  
8 candidates.  
9       **Q. Yeah. I kind of vaguely recall that**  
10 **election.**  
11       **Okay. After running for sheriff in**  
12 **2012, did you run for any other public office before**  
13 **running for the legislature in '18?**  
14       A. I did a write-in campaign that same year  
15 of 2012 for sheriff, just to get my name out there.  
16       **Q. Any other campaigns?**  
17       A. No.  
18       **Q. What made you decide to run for the**  
19 **legislature?**  
20       A. My current legislator was -- the  
21 legislator was blocking some pro-gun bills I was very  
22 concerned about. So I was getting frustrated with  
23 him, and I mentioned it to Greg Pruett that I might  
24 take -- challenge this guy, because I was tired of  
25 his politics. And we kind of talked about it a

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1 little bit.  
2       **Q. What -- who was that legislator?**  
3       A. Tom Loertscher.  
4       **Q. So you told Greg Pruett about your**  
5 **frustrations with Tom?**  
6       A. Yes.  
7       **Q. Did Greg then encourage you to run?**  
8       A. No. Greg said there's somebody in Bear  
9 Lake that was going to run. So I said, okay, I'll  
10 let him go. And later Greg called me. I think, in  
11 February of '18 and said, "Hey, are you still  
12 interested?" Asked me if I was still interested in  
13 running. And I said, "Well, let me think about it  
14 and get back to you."  
15       **Q. And you thought about it?**  
16       A. And said yes, apparently.  
17       **Q. Okay. Did you have an opponent in the**  
18 **primary during the 2018 election?**  
19       A. Yes. Tom Loertscher.  
20       **Q. Tom is still running for the position.**  
21 **And how about in the general election?**  
22       A. Tom Loertscher as a write-in.  
23       **Q. Anybody else?**  
24       A. There was a write-in too, another  
25 write-in -- I don't recall his name. There was



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1 another write-in with Tom.  
 2 **Q. Okay. How long was that first term?**  
 3 A. Two years.  
 4 **Q. And then you ran for a second term again**  
 5 **in 2020?**  
 6 A. Yes.  
 7 **Q. And you won in 2020, correct?**  
 8 A. Yes.  
 9 **Q. All right. And then you ran again last**  
 10 **year, and lost to --**  
 11 A. Josh Wheeler.  
 12 **Q. Josh Wheeler. Okay.**  
 13 **Do you anticipate running for political**  
 14 **office again?**  
 15 A. Yes.  
 16 **Q. Okay. Do you have any specific plans or**  
 17 **just general plans?**  
 18 A. Maybe next year, if the legislature --  
 19 it's not definite yet, but there's -- yeah, maybe  
 20 next year.  
 21 **Q. All right. Are you currently a member**  
 22 **of Oath Keepers?**  
 23 A. No.  
 24 **Q. Have you ever been?**  
 25 A. Yes.

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1 **MR. DINDINGER:** Object to lack of foundation.  
 2 Go ahead.  
 3 **Q. BY MR. ALLEN: When were you a member of**  
 4 **Oath Keepers?**  
 5 A. Probably 2012 to '21, I think.  
 6 **Q. Okay.**  
 7 A. Or whenever it said on there.  
 8 **Q. Are you familiar with the organization**  
 9 **Real Three Percenters of Idaho?**  
 10 A. Yes.  
 11 **Q. Are you a member of that organization?**  
 12 A. I don't consider I am now, but...  
 13 **Q. Were you in the past?**  
 14 A. Yes.  
 15 **Q. When were you a member of the Real Three**  
 16 **Percenters of Idaho?**  
 17 A. 2017 or '18 till '20, '21.  
 18 **Q. Was there ever a time when you had**  
 19 **administrative access to their Facebook page?**  
 20 A. Yes.  
 21 **Q. All right. When was that?**  
 22 A. Probably '18 to '19.  
 23 **Q. How did that come about?**  
 24 A. I was a zone leader, so they gave me  
 25 access to post meetings, times, and places.

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1 **Q. Zone leader?**  
 2 A. Yes.  
 3 **Q. What is the responsibility of a zone**  
 4 **leader in that organization?**  
 5 A. Just organize the local chapter and do  
 6 activities.  
 7 **Q. What kind of activities?**  
 8 A. Survival stuff, shooting, service.  
 9 **Q. Do you recall any of the activities that**  
 10 **you organized?**  
 11 A. Yes. Those things.  
 12 **Q. Okay. What does the zone entail? You**  
 13 **said local. What is "local"? Define that.**  
 14 A. People from Bonneville County,  
 15 Jefferson, Bannock -- I mean, not Bannock. Bingham.  
 16 I think some from Teton County, Fremont County.  
 17 **Q. Madison?**  
 18 A. That was part of the zone. But I don't  
 19 recall anybody from there, but...  
 20 **Q. Okay. Is that all of the zone to**  
 21 **Bingham, Bonneville, Jefferson, Fremont, Teton,**  
 22 **Madison?**  
 23 A. Probably Butte and Lemhi. I can't  
 24 remember the exact areas, but I think that was  
 25 basically it.

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1 **Q. Okay. And how long were you the zone**  
 2 **leader?**  
 3 A. I'd say two years.  
 4 **Q. Okay. Are you or have you been**  
 5 **affiliated with any other organizations similar to**  
 6 **the Real Three Percenters of Idaho?**  
 7 **MR. DINDINGER:** Object to the extent that the  
 8 phrase "similar to" is ambiguous.  
 9 But go ahead, Chad.  
 10 **THE WITNESS:** I don't know. I don't think  
 11 so.  
 12 **Q. BY MR. ALLEN: Have you been affiliated**  
 13 **with any militia groups?**  
 14 **MR. DINDINGER:** Object to the extent the term  
 15 "militia" is ambiguous.  
 16 Go ahead, Chad.  
 17 **THE WITNESS:** If you consider the Three  
 18 Percent, I guess that's up to you to decide, I guess.  
 19 **Q. BY MR. ALLEN: Okay. Any others?**  
 20 A. No.  
 21 **Q. Do you consider the Three Percent to be**  
 22 **a militia group?**  
 23 A. No.  
 24 **Q. What would your definition of a militia**  
 25 **group be?**

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1 A. Organized military activity, platoons,  
2 companies.  
3 **Q. Okay. Are you a member of the John**  
4 **Birch Society?**  
5 A. Yes.  
6 **Q. How long have you been a member of the**  
7 **John Birch Society?**  
8 A. 2018 to just recently. I didn't renew,  
9 but I plan to.  
10 **Q. I'm sorry. Did you say that you didn't**  
11 **renew but you plan to?**  
12 A. Yes.  
13 **Q. Okay. Are you affiliated in any way**  
14 **with the Constitutional Sheriffs and Peace Officers**  
15 **Association?**  
16 A. Have been, yes.  
17 **MR. OBORN:** I'm sorry. What was your answer  
18 to that?  
19 **THE WITNESS:** I have been, yes. Not now.  
20 **Q. BY MR. ALLEN: During what time frame**  
21 **were you affiliated with that group?**  
22 A. 2012-ish. Two thousand- -- around that  
23 time. Maybe '13, maybe '14.  
24 **Q. So it was a short or a somewhat short**  
25 **period of time?**

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1 A. Yes.  
2 **Q. Year or two?**  
3 A. Yes.  
4 **Q. Okay. When did you first become aware**  
5 **of Mr. Graf?**  
6 A. 2018, after I won the primary election.  
7 **Q. How did you first become aware of him?**  
8 A. I believe it was Facebook. I saw his  
9 post or a comment or something from him, or a post or  
10 something.  
11 **Q. Do you remember what it was or the --**  
12 **A. No. I have no idea.**  
13 **Q. -- or the context or the content?**  
14 A. I have no idea.  
15 **Q. But it was enough to draw your attention**  
16 **to his name?**  
17 A. Yes.  
18 **Q. Do you remember why, why it was**  
19 **significant to you?**  
20 A. I thought he used my name somehow, I  
21 believe.  
22 **Q. Okay. But you don't remember what it**  
23 **was about?**  
24 A. No.  
25 **Q. Do you recall having any interaction**

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1 **with him at that time?**  
2 A. I think we -- he responded, I think, to  
3 one of my comments. And that was about it, I think.  
4 **Q. And that was in 2018?**  
5 A. Yes.  
6 **Q. Okay. Do you recall your next**  
7 **interaction with Mr. Graf?**  
8 A. Yes.  
9 **Q. What was that?**  
10 A. I believe it was on my political  
11 Facebook page, somebody -- he was on there. I think  
12 somebody else in Soda Springs -- and I think that  
13 person got a little foggy, I mean, threatening to  
14 hurt Mr. Graf, I believe, which I didn't condone.  
15 I -- I messaged that person, told him not to do  
16 such -- those things, and I -- I didn't know the  
17 person personally, but he was just -- just somebody  
18 on my page, supporting.  
19 **Q. So was this on your -- on your personal**  
20 **page?**  
21 A. Face -- no. Political page.  
22 **Q. Okay.**  
23 A. And I think me and Mr. Graf started  
24 conversing on that post, and I said: Let's take this  
25 to a phone call instead of doing it on the -- on the

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1 post.  
2 **Q. Do you recall about when this was?**  
3 A. I believe it was right before the  
4 general election, I think.  
5 **Q. In 2018?**  
6 A. Yes.  
7 **Q. So just to make sure I'm understanding**  
8 **you correctly, someone else made a comment or a post**  
9 **on your political page in some way threatening**  
10 **towards Mr. Graf?**  
11 A. Right.  
12 **Q. Okay. And then you reached out to**  
13 **Mr. Graf via that comment thread?**  
14 A. Right. I messaged that person first to  
15 knock it off. And then I told him -- and then I  
16 commented to him, and we started to go back and  
17 forth.  
18 I think that Mr. Graf said: I view it  
19 as a threat from you.  
20 And I said: It's not a threat from me.  
21 It's just from my -- somebody I don't even know.  
22 **Q. Okay.**  
23 A. So I said: Let's take this to a phone  
24 call.  
25 **Q. And that was somebody in Soda Springs?**

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1 A. I believe so.  
 2 **Q. Did you, in fact, have a phone call?**  
 3 A. Yes.  
 4 **Q. Tell me about that phone call.**  
 5 A. I remember Mr. Graf being very arrogant,  
 6 saying, "Do you know who I am?" I said no. And then  
 7 he said, "I'm the one that took out Ron Nate."  
 8 **MR. DINDINGER:** Excuse me. He took -- he  
 9 what Ron Nate?  
 10 **THE WITNESS:** "Took out Ron Nate," is how he  
 11 phrased it. He threatened me if I -- not physically.  
 12 He said if I vote like the likes of Heather Scott and  
 13 Priscilla Giddings, he would come after me and make  
 14 sure that I wouldn't get a second term, or something  
 15 like that.  
 16 **Q. BY MR. ALLEN: Anything else that you**  
 17 **recall from that conversation?**  
 18 A. That's the gist of what I -- what I can  
 19 remember.  
 20 **Q. Is there anything about that**  
 21 **conversation that you interpreted as a -- like a**  
 22 **physical threat by Mr. Graf?**  
 23 A. No.  
 24 **Q. So when he said he would come after you,**  
 25 **you understood that to mean politically?**

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1 A. Yes.  
 2 **Q. Do you recall your next interaction with**  
 3 **Mr. Graf after that phone call?**  
 4 A. No. I really don't. But I think that  
 5 there were some online exchanges here and there for a  
 6 couple of years. Then I -- then I recall at the  
 7 courthouse.  
 8 **Q. What about the courthouse?**  
 9 A. He was doing a training -- a legislator  
 10 training, a candidate training, and I decided to go  
 11 to that.  
 12 **Q. That was a training at the courthouse**  
 13 **here in Bonneville County?**  
 14 A. Yes.  
 15 **Q. Let's see. Were you present when**  
 16 **Mr. Graf testified about that yesterday?**  
 17 A. Yes.  
 18 **Q. About Ann Rydalch inviting him to that?**  
 19 A. Yes.  
 20 **Q. Was that the same event that you're**  
 21 **talking about here?**  
 22 A. Yes.  
 23 **Q. Were you there for the whole training?**  
 24 A. I believe -- I think I came late, but...  
 25 **Q. Did you have anybody with you?**

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1 A. Nobody came with me, no.  
 2 **Q. Do you recall Eric Parker being there?**  
 3 A. Yes.  
 4 **Q. And he wasn't with you?**  
 5 A. He came on his own accord.  
 6 **Q. Do you know how Mr. Parker knew about**  
 7 **the event?**  
 8 A. I have no idea.  
 9 **Q. You didn't tell him about it?**  
 10 A. We might have discussed it.  
 11 **Q. Do you recall if Mr. Parker had anybody**  
 12 **else with him?**  
 13 A. I don't think he did.  
 14 **Q. Do you recall if the two of you arrived**  
 15 **at the same time?**  
 16 A. No. He was there before I was.  
 17 **Q. Do you recall if the two of you left at**  
 18 **the same time?**  
 19 A. Yes.  
 20 **Q. When you left, was the event over?**  
 21 A. I believe so, yes.  
 22 **Q. What's your recollection of that event?**  
 23 A. Mr. Graf speaking about how to campaign.  
 24 And I believe there were other people there speaking  
 25 too, not just him.

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1 **Q. Do you recall who the other people**  
 2 **speaking were?**  
 3 A. No.  
 4 **Q. Do you recall anything about what**  
 5 **Mr. Graf spoke about?**  
 6 A. Just candidate training. That's all I  
 7 recall.  
 8 **Q. What's that?**  
 9 A. Just candidate training. That's all I  
 10 know.  
 11 **Q. Okay.**  
 12 A. Or strategies to win a campaign.  
 13 **Q. Do you recall the date of that training?**  
 14 A. No. I believe it was in '19, maybe,  
 15 spring. I don't -- spring or fall. I don't know.  
 16 **Q. Do you recall what happened after you**  
 17 **left?**  
 18 A. Yeah. A deputy showed up in the parking  
 19 lot, because me and Eric Parker and David Lyon were  
 20 speaking with each other. And he approached us,  
 21 asking about a gun.  
 22 **Q. At the time that that happened, were you**  
 23 **still involved with the Three Percenters?**  
 24 **MR. DINDINGER:** Objection as to relevance.  
 25 **THE WITNESS:** I believe so.

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1 Q. BY MR. ALLEN: And was Eric also  
2 affiliated with the Three Percenters?  
3 A. I believe so.  
4 Q. How about David Lyon?  
5 A. Yes.  
6 Q. Was anybody else there with you at the  
7 time, besides those two, in the parking lot?  
8 A. I don't think so.  
9 Q. And you were approached by a deputy?  
10 A. Not me, but I believe David was.  
11 Q. Okay. Did you have any exchange with  
12 the deputy?  
13 A. No. He came and I left.  
14 Q. Okay. So you don't know what happened  
15 once law enforcement arrived?  
16 A. I believe he talked to David and then  
17 left is what I understand.  
18 Q. Okay. But you weren't there for it?  
19 A. Part of it, and then I left.  
20 Q. What do you recall from the part that  
21 you were there for?  
22 A. I just remember him asking about if he  
23 was carrying a gun, and David said no.  
24 Q. Do you recall if anybody had a gun on  
25 them at the time that the deputies arrived?

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1 A. No.  
2 Q. No, you don't recall, or no, no one did?  
3 A. I can't confirm. I don't know what's  
4 underneath their clothes, so I can't confirm that.  
5 But I never did see or saw a gun.  
6 Q. Okay. Did you ever see a video that was  
7 made about that event?  
8 A. I vaguely recall something.  
9 Q. Okay. Did you have any other  
10 interactions with Mr. Graf that you specifically  
11 recall, other than the exchange after the 2018  
12 primary phone call leading up to the 2018 general  
13 election, and then this 2019 candidate training?  
14 A. I don't think so.  
15 Q. During the candidate training, did you  
16 have any exchange with Mr. Graf during his  
17 presentation?  
18 A. No.  
19 Q. Did Eric Parker?  
20 A. I think so. I think Eric asked -- asked  
21 some questions, I think.  
22 Q. How about David Lyon?  
23 A. I don't think so.  
24 Q. And you don't recall any other specific  
25 interactions with Mr. Graf outside of that --

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1 A. I don't, no.  
2 Q. -- or since then?  
3 Any additional online exchanges over the  
4 years since spring of 2019?  
5 A. I don't think so.  
6 Q. Okay. You went to work -- you went to  
7 work for Ms. Robinson's agency in 2021; is that  
8 correct?  
9 A. No, it would be September of '20.  
10 Q. September of '20. Okay.  
11 Do you recall the first time you and  
12 Mrs. Robinson -- Ms. Robinson talked about Mr. Graf?  
13 A. It was the day of the recording, I  
14 believe.  
15 Q. Tell me how that came up.  
16 A. She came -- I had an office downstairs  
17 and she came down and said there's a -- I've been  
18 online looking at an article on East Idaho News, and  
19 Mr. Graf -- Greg Graf is accusing you of these  
20 domestic terrorist things, and I've been talking to  
21 him. And I think that's how it started.  
22 Q. Okay. So she came downstairs and told  
23 you about the online conversation that she had been  
24 having with him?  
25 A. Yes.

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1 Q. What else do you remember from that  
2 conversation?  
3 A. I guess that he was making some  
4 accusations against you, he wants to call me, and I'm  
5 going to record it. And I said, "Please do record  
6 it." And she said that she didn't know how to use  
7 her cell phone. She didn't want to do it in the  
8 office. So she wanted to leave the office and she  
9 asked me about how to record her on a cell phone.  
10 And I said that I know about recording apps because  
11 I'm a PI, so I could help her get that app.  
12 Q. To the best of your recollection, what  
13 happened next?  
14 A. She got the app --  
15 Q. Do you recall what the app was?  
16 A. I have no idea.  
17 Q. Okay.  
18 A. She left and then she called me from a  
19 cell phone to the office -- or to my cell phone. She  
20 said, "I don't know if this app is working. I'm  
21 testing it." And all of a sudden, she said, "Oh,  
22 he's calling right now. I've got to get off." And  
23 that's all.  
24 Q. So she called you to test the app, to  
25 make sure that it was recording?

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1 A. I think so.  
 2 **Q. What do you recall next about that?**  
 3 A. Her coming back and listening to the  
 4 phone call.  
 5 **Q. Did you listen that phone call**  
 6 **immediately after she got back?**  
 7 A. No. Probably a few hours after she let  
 8 me listen to it, I think.  
 9 **Q. Okay. Was that on her phone?**  
 10 A. I believe so. I don't recall how I  
 11 listened to it.  
 12 **Q. Do you recall how you came into**  
 13 **possession of the recording itself?**  
 14 A. I believe she e-mailed it to me.  
 15 **Q. Do you still have that e-mail?**  
 16 A. I'm sure I do.  
 17 **Q. Would you be willing to provide that to**  
 18 **us?**  
 19 A. Yes.  
 20 **Q. I would ask you to look for that, and if**  
 21 **you can locate it, please give it to Mr. Dindinger**  
 22 **and he can get it to us.**  
 23 A. Yes.  
 24 **Q. What did you do next?**  
 25 A. I think that I was telling David Lyon

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1 about the recording, and I let him listen to it -- or  
 2 sent it to him and listened to it.  
 3 **Q. So you sent it to him?**  
 4 A. Yes.  
 5 **Q. Did you and David discuss it at all?**  
 6 A. I'm sure that we did. I can't recall  
 7 anything about that conversation.  
 8 **Q. How did you send it to David?**  
 9 A. E-mail, I believe.  
 10 **Q. Would you still have that e-mail?**  
 11 A. Probably.  
 12 **Q. Would you be willing to provide that**  
 13 **one?**  
 14 A. Yes.  
 15 **Q. I would ask that you do the same with**  
 16 **that one and check it, see if you can locate it, and**  
 17 **please provide it to your counsel to get to us.**  
 18 **What did you do next?**  
 19 A. That's all I recall. I don't recall  
 20 anything after that.  
 21 **Q. You don't recall your conversation with**  
 22 **David about it at all?**  
 23 A. I don't.  
 24 **Q. Okay.**  
 25 A. Just that if it -- I think maybe the

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1 conversation consisted of -- this guy is accusing me  
 2 of all kinds of crazy criminal things and  
 3 he's -- he's -- I thought it was...  
 4 **Q. Okay. Was that the same day you talked**  
 5 **to David Lyon about it?**  
 6 A. Yes.  
 7 **Q. What's your next recollection related to**  
 8 **the recording?**  
 9 A. I think David sent it to Dustin Hurst, I  
 10 believe. Dustin, I think, contacted me.  
 11 **Q. When did Dustin contact you?**  
 12 A. I think that evening, same day.  
 13 **Q. Did he call you?**  
 14 A. I don't remember. I think it was -- I  
 15 don't recall how he contacted me.  
 16 **MR. OBORN:** Could I ask that you speak up  
 17 just a little.  
 18 **THE WITNESS:** I don't recall how he contacted  
 19 me. Sorry. I know I get low and quiet.  
 20 **MR. OBORN:** It's just when the air gets  
 21 turned on, it's just enough. Thank you.  
 22 **Q. BY MR. ALLEN: Do you recall having a**  
 23 **conversation with Dustin about it?**  
 24 A. I think that he wanted to give it to  
 25 Greg Pruett is what he mentioned or something.

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1 **Q. So I'll represent to you that Mr. Pruett**  
 2 **testified this morning that he received it from you.**  
 3 **Do you recall sending it to him?**  
 4 A. I might have. I don't recall.  
 5 **Q. Okay. Obviously you already knew**  
 6 **Mr. Pruett?**  
 7 A. Yes.  
 8 **Q. If you had sent it to him, would that**  
 9 **have been by e-mail?**  
 10 A. I'm sure.  
 11 **Q. Probably know where I'm going next:**  
 12 **Would you still have that e-mail?**  
 13 A. I -- if it exists, I'll look for it,  
 14 yeah.  
 15 **Q. All right. Same request with respect to**  
 16 **that one as the two prior.**  
 17 **Did you, at any point in time, have a**  
 18 **conversation with Mr. Pruett about it?**  
 19 A. I think so.  
 20 **Q. Do you recall having that conversation?**  
 21 A. I think he was mentioning that they  
 22 would do an article and Dustin would write most of  
 23 it, I believe is what he said.  
 24 **Q. Anything else that you recall about that**  
 25 **conversation?**

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1 A. Just kind of probably talking about the  
2 crazy allegations, I think. Just kind of went off.  
3 **Q. Anything else that you remember from**  
4 **that conversation?**  
5 A. No.  
6 **Q. You sent it to David Lyon. You may have**  
7 **sent it to Greg Pruett. Do you recall whether or not**  
8 **you sent it to Dustin? I think that you said that**  
9 **maybe David did?**  
10 A. I think David did, but maybe I did too.  
11 I can look for that too.  
12 **Q. Okay. Aside from those three and your**  
13 **employer at the time, did you have any discussions**  
14 **with it -- about it with anyone at that time?**  
15 A. Do you mean that same day, or what time  
16 frame are you talking about?  
17 **Q. No, just general time frame around the**  
18 **time that you received the recording. Did you**  
19 **discuss it with anybody else?**  
20 A. I think Bryan Smith. Maybe Tammy  
21 Nichols. I can't think of anybody else right now.  
22 **Q. You believe you talked to Tammy Nichols**  
23 **about it?**  
24 A. I believe so.  
25 **Q. And do you recall what you talked about?**

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1 A. Just the same. Just crazy allegations  
2 that we were kind of laughing about.  
3 **Q. Okay. So you shared with her at least**  
4 **what the substance of it was?**  
5 A. Yes.  
6 **Q. Okay. And then you talked to Mr. Smith**  
7 **about it?**  
8 A. I believe so.  
9 **Q. Was he representing you at the time?**  
10 A. No.  
11 **Q. What did you and Mr. Smith discuss about**  
12 **it?**  
13 A. I believe his opinion about what I could  
14 do with it. And it...  
15 **Q. Do you remember what that opinion was?**  
16 A. I don't.  
17 **Q. Okay. Anybody else that you recall**  
18 **discussing it with?**  
19 A. Not right now, I don't.  
20 **Q. Okay. Aside from David Lyon, maybe**  
21 **Mr. Pruett, and maybe Mr. Hurst, is there anybody**  
22 **else that you sent a copy to?**  
23 A. I don't think so. Well, I gave Tammy a  
24 copy.  
25 **Q. Would that have been by e-mail?**

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1 A. Most likely. I believe it was.  
2 **Q. Would you be willing to check and see if**  
3 **you have that e-mail, and get us a copy if you do?**  
4 A. Yes.  
5 **Q. Are you aware of anybody -- any of those**  
6 **people to whom you sent copies, are you aware of**  
7 **whether they sent copies to anyone else?**  
8 A. No. I'm not aware.  
9 **Q. Okay. Do you know whether Ms. Robinson**  
10 **sent a copy to anyone else?**  
11 A. I'm not aware of that.  
12 **Q. Did you ever discuss the recording with**  
13 **Frank VanderSloot?**  
14 A. I don't think so.  
15 **Q. Okay. Did you attempt to discuss the**  
16 **recording with Frank VanderSloot?**  
17 A. I'm pretty sure I didn't.  
18 **Q. Okay. Was it Dustin or Greg that**  
19 **mentioned doing an article?**  
20 A. I think both of them did.  
21 **Q. Okay. Did either of them talk to you**  
22 **about the article, what they thought they would do**  
23 **with it?**  
24 A. I think Greg mentioned they would do a  
25 paragraph, break it up, do a paragraph, and then a

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1 recording, and then a paragraph, kind of format.  
2 Play the sound byte of -- that pertained to that  
3 paragraph. Something like that.  
4 **Q. Did you express any objection to them**  
5 **about doing the article?**  
6 A. No.  
7 **Q. Did they ask you any -- did they ask you**  
8 **about any of the content to verify or deny any of**  
9 **what was said?**  
10 A. I think Greg asked about, I don't know,  
11 sexual stuff, if there was any truth to his  
12 allegation of sexual stuff.  
13 **Q. Okay. Did you ever discuss that, that**  
14 **particular topic from the recording with Adam**  
15 **Frugoli?**  
16 A. No.  
17 **Q. Have you had any conversations with Adam**  
18 **Frugoli since the recording?**  
19 A. Yeah. In political passing, I believe,  
20 yes.  
21 **Q. Any conversations with Adam about the**  
22 **recording?**  
23 A. No.  
24 **Q. Do you know if either Dustin Hurst or**  
25 **Greg Pruett have discussed it with Adam Frugoli?**

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1 A. I don't know.

2 **MR. ALLEN:** All right. We've been going

3 about an hour and a half. Why don't we take a break

4 and see where we go from here.

5 (A recess was taken from 3:08 p.m. to

6 3:27 p.m.)

7 **Q. BY MR. ALLEN:** All right. I'll have you

8 take a look again at the exhibit in front of you,

9 probably 18.

10 **MR. DINDINGER:** Yeah, 18.

11 **Q. BY MR. ALLEN:** All right. Turn to

12 page 4, if you will. Page 4, paragraph 17, you

13 allege, quote: "Plaintiff believes that Defendant

14 Graf may have communicated these or other defamatory

15 statements to other person" -- "persons," excuse me.

16 "Plaintiff hereby gives notice of his intent to seek

17 leave to amend this verified complaint once discovery

18 has been undertaken."

19 Did I read that correctly?

20 A. Yeah. I read the same thing.

21 **Q. Okay. Are you aware of anyone with whom**

22 **Mr. Graf has communicated about these alleged**

23 **defamatory statements?**

24 A. No, I'm not.

25 **Q. Okay.**

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1 A. Besides EmmaLee.

2 **Q. Right. So your employer contacted him**

3 **asking for information, and to your knowledge, that**

4 **information --**

5 A. That's not how I see it, but okay.

6 **Q. Beyond her, that information was only**

7 **distributed by you or her.**

8 A. Of what I know, yes, right now.

9 **Q. Did you ever work for an organization**

10 **called Elite Security?**

11 A. Yeah. I've done sales with them, yes.

12 **Q. You've done what?**

13 A. I've done sales with them on the side,

14 yes.

15 **Q. What is Elite Security?**

16 A. Security cameras, systems.

17 **Q. When did you work for them?**

18 A. I still do a little bit on the side. I

19 want to say I started helping them once in a while

20 probably '19 or '20, probably '20, summer, or

21 something like that.

22 **Q. Okay. Is that like home security?**

23 A. Yes.

24 **Q. That would be commercial, business,**

25 **commercial security cameras, alarm systems?**

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1 A. Yes.

2 **Q. Okay. Would that be similar, like, to**

3 **an ADT system?**

4 A. Right.

5 **Q. Okay.**

6 A. Correct.

7 **Q. In terms of your private investigation**

8 **business, do you ever conduct investigations on your**

9 **own behalf?**

10 A. Do I do investigations for myself?

11 **Q. Yeah.**

12 A. Of something that I want to look into?

13 **Q. Yeah.**

14 A. I don't think so.

15 **Q. Have you ever investigated Mr. Graf in**

16 **any way?**

17 A. No.

18 **Q. Have you ever investigated me in any**

19 **way?**

20 A. No.

21 **Q. Okay. I don't think that I warrant**

22 **investigation, but...**

23 Do you recall sending Mr. Graf a thank

24 you card after the Bonneville County candidate --

25 A. Yes.

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1 **Q. -- presentation?**

2 **How did you get his address?**

3 A. I believe I did pull it up. So that was

4 kind of an investigation, I guess. I pulled it up on

5 the system that I use.

6 **Q. Okay. What's the name of that system?**

7 A. Intelius.

8 **Q. Intelius? I-n-t --**

9 A. Intelius. It's e-l-i-u-s ---

10 **Q. I-n-t-e-l-i-u-s?**

11 A. E-n -- Intelius, I think.

12 **Q. Okay. So beyond looking up his address**

13 **to send him a card, you haven't conducted any**

14 **investigation into him?**

15 A. No.

16 **Q. Have you ever been charged with a crime?**

17 A. Yes.

18 **Q. More than once?**

19 A. Yes.

20 **Q. What crimes have you been charged with?**

21 A. '95, striking an unattended vehicle.

22 **Q. Any others?**

23 A. 2013 -- I'm not sure what they're called

24 exactly. Discharge of foreign material, something

25 like that. I don't -- I had a spill from my truck or

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1 a bad valve -- a malfunctioning valve.  
 2 **Q. This is in the oil fields?**  
 3 A. Yes.  
 4 **Q. Do you recall what you were hauling at**  
 5 **the time?**  
 6 A. A combination of invert mud and salt  
 7 water, production water.  
 8 **Q. Just part of the fracking process?**  
 9 A. The drilling process.  
 10 **Q. Okay. What kind of charge was that?**  
 11 A. It was a misdemeanor at first, and then  
 12 I show up at court and they raised it to a felony.  
 13 **Q. How was that resolved?**  
 14 A. What do you call it? Withheld judgment.  
 15 Sealed -- sealed case.  
 16 **Q. Okay. Did you enter a guilty plea or an**  
 17 **Alfred plea or some kind of -- or did it go to trial?**  
 18 A. No. It didn't go to trial. I did a  
 19 withheld judgment to avoid trial and --  
 20 **Q. Okay. So you entered a plea agreement**  
 21 **that they offered you a withheld judgment on it?**  
 22 A. Yes.  
 23 **Q. What about the striking vehicle charge?**  
 24 **How was that resolved?**  
 25 A. I think that I paid a fine.

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1 **Q. Was that just an infraction?**  
 2 A. I think it was a misdemeanor.  
 3 **Q. Misdemeanor. I mean, you were what, 18,**  
 4 **19 years old?**  
 5 A. No. I was 21 or something, 22.  
 6 **Q. Okay.**  
 7 A. Yeah.  
 8 **Q. Any other criminal charges besides those**  
 9 **two?**  
 10 A. No.  
 11 **Q. Okay.**  
 12 A. Oh, I did get charged for trespass.  
 13 **Q. When was that?**  
 14 A. '96.  
 15 **Q. Where was that?**  
 16 A. The buttes in Madison County.  
 17 **Q. Out there by Menan?**  
 18 A. Yes. Menan Buttes.  
 19 **Q. What was the circumstances there?**  
 20 A. I was off-roading with my Jeep. Came  
 21 down and the sheriff told me I was trespassing and  
 22 charged me.  
 23 **Q. How was that resolved?**  
 24 A. I went out and got footage of the signs  
 25 and proved it wasn't posted, and the prosecutor

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1 dismissed the charge.  
 2 **Q. Okay. So you mentioned that you were**  
 3 **let go from your position with State Probation &**  
 4 **Parole. Have you had any other workplace discipline**  
 5 **that was not termination-related?**  
 6 A. I --  
 7 **MR. DINDINGER:** Object as to relevance.  
 8 Go ahead, Chad.  
 9 **THE WITNESS:** I got written up, welfare  
 10 fraud, for leaving a car running unattended. That's  
 11 all. I don't recall anything else.  
 12 **Q. BY MR. ALLEN: No other write-ups?**  
 13 A. I terminated my contract at Farm Bureau.  
 14 **Q. How did that happen?**  
 15 A. They wouldn't give me a reason. They  
 16 said that we were not -- they told me that we were  
 17 not -- what was the word they used?  
 18 **Q. It was one of those not-a-good-fit**  
 19 **terminations?**  
 20 A. Yeah. That's exactly what he said.  
 21 "Not a good fit."  
 22 **Q. Okay. Did you ever try to look into why**  
 23 **it happened?**  
 24 A. I accused the vice president of  
 25 political reasons during that -- during that

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1 terminated contract meeting. But, no, I didn't find  
 2 anything else.  
 3 **Q. Who was the vice president?**  
 4 A. The vice president of sales was who it  
 5 was. I don't recall his name. My manager, my  
 6 regional manager was Vance -- I can't remember his  
 7 last name now.  
 8 **Q. Did you have reasons to think that the**  
 9 **VP was opposed to you politically or something? Is**  
 10 **that --**  
 11 A. Since I started working there, I was  
 12 made aware -- like in the first week, I was made  
 13 aware that Stephanie Mickelson didn't like me and she  
 14 wanted me gone.  
 15 **Q. Who told you that?**  
 16 A. Vance.  
 17 **Q. What did you say his last name was?**  
 18 A. Don't recall right now.  
 19 **Q. I'm just checking a lot of stuff in my**  
 20 **head that we've already covered, so I'm trying to**  
 21 **save us some time.**  
 22 **Did you ever share a post or content**  
 23 **about Mr. Graf on any social media platform?**  
 24 A. "Share a post comment"?  
 25 **Q. Share or post content about Mr. Graf.**



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1 A. I think so.  
 2 **Q. You do think so? What content do you**  
 3 **recall posting about Mr. Graf?**  
 4 A. Probably an article that he -- that the  
 5 Post Register -- something to do with that, maybe  
 6 some --  
 7 **Q. Which article is that?**  
 8 A. The Post Register put out an article  
 9 that he was interviewed in. I think that I posted  
 10 about that.  
 11 **Q. What did that article have to do with?**  
 12 A. This lawsuit.  
 13 **Q. Okay. Anything else?**  
 14 A. I don't have anything specific. Just  
 15 probably things that he was harassing me about.  
 16 **Q. Did you post any links to the Keep Idaho**  
 17 **Free articles?**  
 18 A. Probably. I think did. Yes.  
 19 **Q. Anything else?**  
 20 A. Not that I can recall.  
 21 **Q. Okay. Would it be fair to say that most**  
 22 **of your online activity that relates to Mr. Graf has**  
 23 **been exchanges between the two of you?**  
 24 A. Probably.  
 25 **MR. ALLEN:** I'm getting really close to being

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1 finished. Why don't we take another short break, and  
 2 then we'll see if I have anything left.  
 3 (A recess was taken from 3:44 p.m. to  
 4 3:49 p.m.)  
 5 **MR. ALLEN:** All right. Let's go back.  
 6 **Q. BY MR. ALLEN: What losses do you claim**  
 7 **that you've sustained as a consequence of Mr. Graf's**  
 8 **actions?**  
 9 **MR. DINDINGER:** Objection to the extent it  
 10 calls for a legal conclusion and calls for  
 11 speculation.  
 12 Go ahead, Chad.  
 13 **THE WITNESS:** Attempting to get me terminated  
 14 I believe was harmful to my career.  
 15 **Q. BY MR. ALLEN: Did you get terminated?**  
 16 A. No.  
 17 **Q. Okay. You left a year later,**  
 18 **voluntarily, right?**  
 19 A. Yes.  
 20 **Q. To start up a new business?**  
 21 A. Yes.  
 22 **Q. Did you have to acquire a franchise with**  
 23 **Goosehead?**  
 24 A. Yes.  
 25 **Q. How much was that?**

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1 A. 25,000.  
 2 **Q. Okay. Can you identify any business**  
 3 **that you lost as a consequence of Mr. Graf's**  
 4 **conversation with EmmaLee Robinson?**  
 5 A. Not readily, no.  
 6 **Q. Can you identify anyone that is even**  
 7 **aware of it, other than Ms. Robinson, that learned of**  
 8 **it from Mr. Graf?**  
 9 A. I'm not aware, no.  
 10 **Q. Did you ever conduct an investigation of**  
 11 **Mr. Graf for anyone other than yourself?**  
 12 A. Have I -- I'm sorry.  
 13 **Q. Have you conducted an investigation into**  
 14 **Mr. Graf for anyone other than yourself? I asked you**  
 15 **before if you had done it for yourself.**  
 16 A. Right. No, I don't think so.  
 17 **Q. Okay. So you don't have an**  
 18 **investigative file on Mr. Graf?**  
 19 A. No.  
 20 **Q. Okay.**  
 21 **MR. ALLEN:** Okay. I think that's all I've  
 22 got.  
 23 **MR. OBORN:** I have a few questions.  
 24  
 25

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1 **THE WITNESS:** Oh.  
 2 **EXAMINATION**  
 3 **BY MR. OBORN:**  
 4 **Q. Mr. Christensen, my name is J.D. Oborn,**  
 5 **and I represent EmmaLee Robinson.**  
 6 **You've talked today about the date the**  
 7 **recording of the conversation between Mr. Graf and**  
 8 **Ms. Robinson was made. Do you recall that day?**  
 9 A. Yes. Vaguely, but yes.  
 10 **Q. You had mentioned that at some point in**  
 11 **time Ms. Robinson came into your office and told you**  
 12 **that she had been in communication with Mr. Graf**  
 13 **online, correct?**  
 14 A. Yes.  
 15 **Q. Prior to her coming into that online**  
 16 **conversation, had you asked her to reach out to**  
 17 **Mr. Graf?**  
 18 A. No.  
 19 **Q. Had you asked her to record any**  
 20 **conversation with Mr. Graf?**  
 21 A. No.  
 22 **Q. When she came in and told you that**  
 23 **Mr. Graf was going to call her, did you ask her to**  
 24 **record the conversation?**  
 25 A. No. She -- she said that she was going

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1 to record it.  
 2 **Q. Did you -- did you and Ms. Robinson**  
 3 **enter into any type of agreement or plan to impact**  
 4 **Mr. Graf's employment at all?**  
 5 A. No.  
 6 **Q. Did you, Ms. Robinson, Mr. Pruett, and**  
 7 **Mr. Hurst have any type of agreement to pursue any**  
 8 **type of claims or -- against Mr. Graf prior to the**  
 9 **recorded conversation?**  
 10 A. Oh, no.  
 11 **Q. Did you have an agreement to try and go**  
 12 **after Mr. Graf politically as a group?**  
 13 A. Public -- I know -- beforehand, you're  
 14 saying?  
 15 **Q. Before this conversation, recorded**  
 16 **conversation.**  
 17 A. No. No.  
 18 **MR. OBORN:** I don't have any other questions.  
 19 **MR. ALLEN:** Greg, do you have anything?  
 20 **MR. PRUETT:** I'm good.  
 21 **MR. ALLEN:** Okay.  
 22 **EXAMINATION**  
 23 **BY MR. DINDINGER:**  
 24 **Q. Chad, you were present for Mr. Graf's**  
 25 **deposition yesterday regarding the articles that were**

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1 **published regarding the phone call that's the subject**  
 2 **of this case; is that accurate?**  
 3 A. Yes. Yes.  
 4 **Q. And to the best of your understanding,**  
 5 **were those articles published on the Keep Idaho Free**  
 6 **website?**  
 7 A. Yes.  
 8 **Q. And is that website, to the best of your**  
 9 **knowledge, controlled by Greg Pruett?**  
 10 A. As far as I know, yes.  
 11 **Q. Have you ever had any ownership of that**  
 12 **website?**  
 13 A. No.  
 14 **Q. Have you ever exercised any management**  
 15 **of any website?**  
 16 A. No.  
 17 **Q. Have you ever contributed content to**  
 18 **that website?**  
 19 A. I might have wrote an op-ed once, but  
 20 I'm not sure if that -- no. I think that was with  
 21 the Dispatch. So, no, I don't think so.  
 22 **Q. Okay. And have you ever exercised any**  
 23 **editorial control over that website?**  
 24 A. No.  
 25 **Q. Did Mr. Pruett and -- excuse me, did**

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1 **Mr. Pruett ever ask you permission to publish those**  
 2 **articles?**  
 3 A. No.  
 4 **Q. Did Mr. Hurst ever ask you permission to**  
 5 **publish those articles?**  
 6 A. No.  
 7 **Q. Did you contribute to the writing of**  
 8 **those articles at all?**  
 9 A. No.  
 10 **Q. A little bit earlier Mr. Allen was**  
 11 **asking you some questions about your work with Elite**  
 12 **Security.**  
 13 A. Uh-huh.  
 14 **Q. Do you recall that?**  
 15 A. Yes.  
 16 **Q. And I just want to clarify: Were you an**  
 17 **employee of Elite Security?**  
 18 A. No. Subcontractor -- contracted with  
 19 them.  
 20 **Q. Like a 1099 independent contractor**  
 21 **relationship?**  
 22 A. Yes. Yes.  
 23 **Q. Do you recall Mr. Allen asking you about**  
 24 **some criminal charges that were filed against you in**  
 25 **the past?**

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1 A. Yes.  
 2 **Q. Just to be absolutely clear for the**  
 3 **record, were any of the allegations which led to**  
 4 **those charges sexual in nature?**  
 5 A. No.  
 6 **MR. DINDINGER:** Okay. That's all I have.  
 7 **MR. OBORN:** I think we're done then, unless  
 8 you have more.  
 9 **MR. ALLEN:** Give me just a second.  
 10 **FURTHER EXAMINATION**  
 11 **BY MR. ALLEN:**  
 12 **Q. Would it be fair to say that but for**  
 13 **your decision to send the recording to Mr. Pruett or**  
 14 **Mr. Hurst and/or Mr. Lyon, that the articles on Keep**  
 15 **Idaho Free would not exist?**  
 16 **MR. DINDINGER:** Object as to form. Compound.  
 17 **THE WITNESS:** Was it my understanding that --  
 18 **MR. DINDINGER:** Calls for the -- oh.  
 19 **THE WITNESS:** Sorry.  
 20 **MR. DINDINGER:** And to the extent that it  
 21 calls for a legal conclusion.  
 22 Go ahead, Chad.  
 23 **THE WITNESS:** So you're asking if -- if I  
 24 knew those would exist if I sent them?  
 25 **Q. BY MR. ALLEN: No. Would it be fair to**

1 say that if you hadn't sent them, they would not have  
2 had the content to write the articles?

3 A. My opinion would be yes.

4 Q. Yes, they would not have had the content  
5 to write the articles?

6 A. Yes.

7 MR. ALLEN: Okay. No further questions.

8 THE COURT REPORTER: Read and sign?

9 MR. DINDINGER: I would like the hard copy of  
10 this one in addition to the electronic.

11 (The deposition concluded at 3:57 p.m.)  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 REPORTER'S CERTIFICATE  
2

3 STATE OF IDAHO }  
4 COUNTY OF BONNEVILLE } ss.  
5  
6

7 I, Sheila T. Fish, CSR, RPR, CRR, and Notary  
8 Public in and for the State of Idaho, do hereby  
9 certify:

10 That prior to being examined Chad Christensen,  
11 the witness named in the foregoing deposition, was by  
12 me duly sworn to testify to the truth, the whole  
13 truth, and nothing but the truth;

14 That said deposition was taken down by me in  
15 shorthand at the time and place therein named and  
16 thereafter reduced to typewriting under my direction,  
17 and that the foregoing transcript contains a full,  
18 true, and verbatim record of said deposition.

19 I further certify that I have no interest in the  
20 event of the action.

21 WITNESS my hand and seal this 15th day of August  
22 2023.  
23  
24  
25

Sheila T. Fish  
Idaho CSR No. 906,  
Notary Public in and for  
the State of Idaho

**In The Matter Of:**  
*CHRISTENSEN vs.*  
*GRAF, et al.*

---

*GREG PRUETT*  
*August 01, 2023*

---

*T&T Reporting, LLC*  
*477 Shoup Avenue, Suite 105*  
*Idaho Falls, Idaho 83402*  
*(208) 529-5491*

Page 1

1 DISTRICT COURT SEVENTH JUDICIAL DISTRICT  
 2 BONNEVILLE COUNTY IDAHO  
 3  
 4 CHAD CHRISTENSEN, )  
 5 Plaintiff/Counterdefendant, ) Case No.  
 6 vs. ) CV10-21-1197  
 7 )  
 8 GREGORY GRAF, )  
 9 Defendant/Counterclaimant/  
 10 Third-Party Plaintiff, )  
 11 vs. )  
 12 GREG PRUETT, an individual; DUSTIN  
 13 HURST, an individual; and EMMALEE  
 14 ROBINSON, an individual, )  
 15 Third-Party Defendants. )

15 DEPOSITION OF GREG PRUETT  
 16 Tuesday, August 1, 2023, 9:03 a.m.  
 17 Idaho Falls, Idaho

21 BE IT REMEMBERED that the deposition of Greg  
 22 Pruett was taken by the attorney for the defendant at  
 23 the office of Beard St. Clair Gaffney, located at 955  
 24 Pier View Drive, Idaho Falls, Idaho, before Sheila T.  
 25 Fish, Court Reporter and Notary Public, in and for  
 the State of Idaho, in the above-entitled matter.

25 Reported by: Sheila T. Fish, CSR #906, RPR, CRR

Page 2

1 A P P E A R A N C E S  
 2  
 3 For the Defendant Gregory Graf:  
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 31 Post Office Box 50731  
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 33 (208) 524-0731  
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 35  
 36 For the Witness:  
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 38 BY: ANDREW M. WAYMENT  
 39 1906 Jennie Lee Drive  
 40 Idaho Falls, Idaho 83404  
 41 (208) 271-4403  
 42 Andrewmwayment@gmail.com

Page 3

1 A P P E A R A N C E S  
 2 (Continued)  
 3  
 4 Also Present:  
 5 EmmaLee Robinson  
 6  
 7  
 8  
 9  
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1 E X A M I N A T I O N  
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11 E X H I B I T S  
 12 No. Page  
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 14 [Exhibit 12](#) "With Lies and 'Gun-Free Zones' ... 61  
 15 [Exhibit 13](#) "Organized Crime?" (Part 3)" ..... 74  
 16 [Exhibit 14](#) "Doyle Beck (Part 4)" Article ..... 77  
 17 [Exhibit 15](#) Greg Pruett Facebook Post ..... 80  
 18 [Exhibit 16](#) Greg Pruett for Idaho Facebook .... 82  
 19 Post  
 20 [Exhibit 17](#) Greg Pruett for Idaho Facebook .... 83  
 21 Post  
 22  
 23  
 24  
 25

Page 5

1 (The deposition proceeded at 9:03 a.m.  
2 as follows:)  
3  
4 GREG PRUETT,  
5 produced as a witness at the instance of the  
6 defendant, having been first duly sworn, was examined  
7 and testified as follows:  
8  
9 EXAMINATION  
10 BY MR. ALLEN:  
11 Q. So the record should reflect that this  
12 is the time and the place for the deposition of Greg  
13 Pruett, being taken pursuant to the Idaho Rules of  
14 Civil Procedure and notice. I want to note for the  
15 record that Mr. Bryan Smith apparently went to the  
16 wrong location but called this morning and authorized  
17 us to begin the deposition without him present. We  
18 expect that he'll arrive any minute now.  
19 Will you state your name and spell your  
20 name for the reporter?  
21 A. Greg, G-r-e-g; A, middle initial;  
22 Pruett, P-r-u-e-t-t.  
23 Q. Mr. Pruett, have you ever been deposed  
24 before?  
25 A. No, sir.

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1 Q. Okay. Let me cover some ground rules  
2 with you then. Some of it you probably observed  
3 yesterday because you were present for the deposition  
4 of Mr. Graf.  
5 The big one obviously is that we can't  
6 talk over each other.  
7 A. Sure.  
8 Q. She's doing her best to write down every  
9 word we say, and if you and I start to talk over each  
10 other, that gets very challenging for her; is that  
11 fair?  
12 A. Okay.  
13 Q. Second is you probably noticed also  
14 yesterday that Mr. Graf had a tendency to say  
15 "uh-huh" or "uh-uh," and was frequently corrected by  
16 Mr. Dindinger and Mr. Smith, you know, "Is that a  
17 yes?" To the best you can, use "yes" or "no" or some  
18 other actual word to respond, other than "uh-huh" or  
19 "uh-uh," because it's very hard to transcribe and get  
20 an accurate record.  
21 I don't think I'm quite as good as they  
22 are at catching that, so I'll be a little bit  
23 dependant upon you to -- to try to use actual words.  
24 But I will try to correct you if so, and I'm not  
25 trying to be rude. I just want to make sure that we

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1 have an accurate record; is that fair?  
2 A. Fair.  
3 Q. Okay. Breaks, if you need a break at  
4 any time, we can take a break. This is not an  
5 endurance test. I don't want to overtax you in any  
6 way. The only thing that I would ask is if there is  
7 a question on the table, that you respond to that  
8 question before we break. Fair?  
9 A. Fair.  
10 Q. Is there any reason today that you  
11 cannot fully and fairly respond to or participate in  
12 this deposition?  
13 A. Not that I'm aware of.  
14 Q. Are you under the influence of any  
15 medication that would influence your ability to  
16 recall or your ability to be truthful?  
17 A. No, sir.  
18 Q. Okay. Great.  
19 Who -- other than, obviously, the people  
20 in this room, who knows you're here today?  
21 A. My wife, my kids, the third -- the other  
22 third-party defendants, the attorneys in this room,  
23 Christy Zito, my parents, and I assume most of  
24 Twitter, since your client posted that online, that I  
25 was being deposed.

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1 Q. Okay. Or at least most of Twitter who  
2 pays attention to his tweets. And Twitter is much  
3 bigger than that, but --  
4 A. Correct.  
5 Q. Who is Christy Zito?  
6 A. She's the political director for the  
7 Idaho Second Amendment Alliance.  
8 Q. And while we're there, why don't you  
9 tell me what the Idaho Second Amendment Alliance is?  
10 A. A nonprofit organization that fights for  
11 the right to keep and bear arms.  
12 Q. Is that a 501(c)(3)?  
13 A. (c)(4).  
14 Q. (c)(4).  
15 Did you discuss the deposition with her?  
16 A. Yesterday?  
17 Q. Anytime. No. Did you discuss this  
18 deposition with her?  
19 A. She knew -- I just said I'm being  
20 deposed at 9 o'clock on August 1st.  
21 Q. Okay. So you didn't have any  
22 substantive conversations about it?  
23 A. No. No.  
24 Q. Okay. Aside from the people that you've  
25 already told me that know you're here, have you

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1 **discussed the deposition with anybody else?**  
2 A. Possibly. I'm -- I'm -- I can't recall  
3 who else I may have mentioned in passing that I was  
4 being deposed today.  
5 **Q. Okay.**  
6 A. But that's possible.  
7 **Q. Of the people you named, excluding your**  
8 **attorney, obviously, did you have any substantive**  
9 **discussions about this deposition with anybody?**  
10 A. About today's deposition, I -- nothing  
11 concrete, you know.  
12 **Q. Did you have any discussions with**  
13 **anybody about the facts of the case in order to**  
14 **prepare for this deposition?**  
15 A. I -- I've talked to Dustin on the phone  
16 several times.  
17 **Q. That's Dustin Hurst?**  
18 A. Yes, sir.  
19 **Q. When was the last time you talked to**  
20 **Mr. Hurst about the case?**  
21 A. Yesterday.  
22 **Q. Okay. What did you talk about**  
23 **yesterday?**  
24 A. We talked briefly about what happened in  
25 the deposition yesterday.

Page 10

1 **Q. Anything else?**  
2 A. I told him I was on a trip to  
3 St. Anthony for a gun rally, and that was it.  
4 **Q. Okay. What other conversations have you**  
5 **had with Dustin about the case?**  
6 A. I'm just trying to remember. We  
7 don't -- we don't talk about it very often. I think  
8 once the -- if I remember correctly, once the  
9 depositions were announced, we kind of talked about  
10 it, and, you know, who was which days, because I  
11 remember I wanted to attend all of the depositions  
12 and he wasn't sure if he could. In fact, that's why  
13 he's not here. I think he's camping. But outside  
14 of, you know, going into details about the case, we  
15 just -- we didn't talk about it much.  
16 **Q. So you didn't discuss the details of the**  
17 **case, or you did discuss the details of the case?**  
18 A. Just not in depth.  
19 **Q. Okay.**  
20 A. Not in depth. I'm -- you know, I may  
21 have called up and briefly talked about, you know,  
22 what happened or how -- how the phone call or the  
23 recording came about and stuff like that, but nothing  
24 concrete. Nothing in depth, I should say.  
25 **Q. Okay. Did you review any documents or**

Page 11

1 **any records, whether they be physical copies or**  
2 **electronic copies, in preparation for the deposition?**  
3 A. Mostly what you guys had requested in  
4 discovery, trying -- and trying to find anything for  
5 discovery.  
6 **Q. Okay.**  
7 A. So...  
8 **Q. Do you -- do you recall any specific**  
9 **documents that you looked at?**  
10 A. Some of them would be social media posts  
11 that I had on my computer, which we'll have for  
12 discovery. The e-mail, original e-mail that came  
13 from Chad to me with the audio recording. Other  
14 e-mails, you know, that I had forwarded the e-mail to  
15 Dustin. I went through, obviously, the actual  
16 discovery request.  
17 You know, I'm trying to think of  
18 anything else that might -- might be in there in  
19 terms of documents outside of just what was in the  
20 discovery requests, but...  
21 **Q. So just because we're on the topic, when**  
22 **you say "the recording," you're referring to the**  
23 **recording that was made by EmmaLee Robinson, the**  
24 **conversation with Greg Graf; is that correct?**  
25 A. Correct, yeah. I -- I haven't listened

Page 12

1 to it recently, but I -- I found the e-mail where I  
2 had received the recording.  
3 **Q. Okay. And -- and just so we're clear on**  
4 **our record, you received that from Chad Christensen?**  
5 A. Correct.  
6 **Q. Okay. And then you sent that by e-mail**  
7 **to Dustin Hurst?**  
8 A. Correct.  
9 **Q. Okay. And you have those e-mails?**  
10 A. Correct.  
11 **Q. All right. Do you have those with you**  
12 **today, by any chance?**  
13 A. Yes and no. They're on the -- he's got  
14 a thumb drive that has a lot of the discovery  
15 requests you guys have asked for.  
16 **Q. Okay.**  
17 A. But obviously I would have him download  
18 all that first and go through it, and then we can  
19 give it to you guys.  
20 **Q. Okay. I'll probably leave your**  
21 **deposition open when we get done, just in case I have**  
22 **follow-up questions on any discovery after it's**  
23 **tendered. I don't know if I will or not, but I don't**  
24 **want to close the deposition and not be able to**  
25 **inquire on those documents after they're produced.**

1 While we're on the topic, though, do you  
 2 recall what Chad said in that e-mail when he sent the  
 3 recording to you, just as best as you can recall?  
 4 A. Yeah. From what I recall, he didn't add  
 5 anything to the e-mail --  
 6 **Q. Okay.**  
 7 A. -- in terms of his own -- his own words.  
 8 It was just an attachment that he had.  
 9 **Q. He just forwarded an attachment?**  
 10 A. Correct. That -- that I remember.  
 11 **Q. At that time -- and maybe we should**  
 12 **define "that time." Do you recall when that was?**  
 13 A. If I recall from last night, my  
 14 recollection was October -- 20th?  
 15 **Q. Okay.**  
 16 A. It was 2020.  
 17 **Q. Okay. So at the time when it arrived,**  
 18 **did you know what it was?**  
 19 A. I only knew that it was a conversation  
 20 between Mr. Christensen -- or, excuse me,  
 21 Mrs. Robinson and Mr. Graf.  
 22 **Q. And how did you know that?**  
 23 A. I found out about the recording because  
 24 Dustin Hurst had contacted me to let me know that it  
 25 existed. I contacted Chad and said: I heard that

1 **Q. Okay. And what did you and Chad talk**  
 2 **about in that call?**  
 3 A. The -- the only thing that I remember is  
 4 that he told me there was a recording. And I asked  
 5 him if -- if he had it, and he said, "I -- I will  
 6 eventually." And then -- I want to say later --  
 7 later on October 20th, from what I recall, he sent me  
 8 the recording. But I didn't talk to him about the  
 9 details of the recording at that time.  
 10 **Q. Okay. So at the time you talked to him,**  
 11 **he didn't yet have a copy?**  
 12 A. I -- I don't believe so.  
 13 **Q. Okay.**  
 14 A. But I didn't have the copy.  
 15 **Q. All right. We got a little ahead of**  
 16 **ourselves. So let me just get some -- some**  
 17 **background information about you.**  
 18 **Where do you currently reside?**  
 19 A. Full address?  
 20 **Q. That would be fine. Yeah, that would be**  
 21 **great, actually.**  
 22 A. 3 North 3710 East, Rigby 83442.  
 23 **Q. And how long have you been at that**  
 24 **address?**  
 25 A. Just over two years.

1 there's some sort of recording out there between your  
 2 employer and Mr. Graf. And then he sent that to me.  
 3 **Q. Okay. Did Dustin tell you how he knew**  
 4 **about the recording?**  
 5 A. He did not.  
 6 **Q. Do you recall when he contacted you?**  
 7 A. I don't recall the specific day. I  
 8 can't even tell you if it was the same day that the  
 9 recording eventually ended up in my e-mail or if it  
 10 was the day before. I -- I don't remember.  
 11 **Q. So Dustin then called you, you then**  
 12 **called Chad?**  
 13 A. Correct.  
 14 **Q. Did you and Dustin have a conversation**  
 15 **about it at all at that time?**  
 16 A. At which time? Sorry.  
 17 **Q. When he called you and told you the**  
 18 **recording existed?**  
 19 A. No. Because he didn't know what was on  
 20 it. I didn't know what was on it.  
 21 **Q. Okay. He just told you there was a**  
 22 **recording?**  
 23 A. Correct. Yeah.  
 24 **Q. And so then you called Chad?**  
 25 A. Correct.

1 **Q. Where did you live prior to moving to**  
 2 **that address in Rigby?**  
 3 A. Caldwell, Idaho.  
 4 **Q. And how long did you live in Caldwell?**  
 5 A. We've moved so many times. I'll have to  
 6 remember. I want to say about four years prior to  
 7 that.  
 8 **Q. Where did you live before that?**  
 9 A. In Wisconsin.  
 10 **Q. Okay. Where are you originally from?**  
 11 A. I was born in Wyoming and grew up in  
 12 Pocatello.  
 13 **Q. What took you to Wisconsin?**  
 14 A. I was helping a new gun rights  
 15 organization get launched there.  
 16 **Q. What was that organization?**  
 17 A. Wisconsin Firearms Coalition.  
 18 **Q. How long were you out there, helping**  
 19 **them?**  
 20 A. About 18 months.  
 21 **Q. Do you have any other experience setting**  
 22 **up firearms coalitions or firearms organizations?**  
 23 A. Yes. I helped -- helped start the  
 24 Washington Gun Rights, and also kind of worked with  
 25 the Utah Firearms Coalition too.



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1 **Q. Tell me what Washington Gun Rights is.**  
 2 A. At the time I started it, it was an LLC  
 3 in Washington. It is currently a -- a nonprofit,  
 4 though, (c)(4).  
 5 **Q. Okay. So is it effectively a gun rights**  
 6 **lobbying organization?**  
 7 A. Correct.  
 8 **Q. Is that how you characterize it?**  
 9 A. Correct.  
 10 **Q. Is that the same for the Wisconsin**  
 11 **Firearms Coalition?**  
 12 A. Correct.  
 13 **Q. And the Utah Firearms Coalition?**  
 14 A. Correct.  
 15 **Q. Any other gun rights organizations that**  
 16 **you helped organize besides those three?**  
 17 A. Not at this time, no.  
 18 **Q. Were you involved with the organization**  
 19 **of the Idaho Second Amendment Alliance?**  
 20 **THE WITNESS:** I'm sorry. Can you repeat that  
 21 for me?  
 22 (Requested portion of record read.)  
 23 **THE WITNESS:** Am I involved with?  
 24 **Q. BY MR. ALLEN: Were you involved with**  
 25 **organizing?**

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1 A. Oh. Yes, sir.  
 2 **Q. And is that also a gun rights lobbying**  
 3 **organization?**  
 4 A. Correct.  
 5 **Q. When was it organized?**  
 6 A. I started it on -- excuse me, August the  
 7 21st, 2012. And it didn't -- it didn't become a  
 8 nonprofit until the end of 2015. Reorganized it  
 9 then.  
 10 **Q. Okay. What do you do for a living?**  
 11 A. I lobby for gun rights.  
 12 **Q. And how long have you done that?**  
 13 A. Since 2012.  
 14 **Q. Is lobbying for gun rights your sole**  
 15 **source of income?**  
 16 A. I guess I don't know how you would  
 17 define income. So I have a -- I have medical  
 18 disability from the VA, so --  
 19 **Q. Okay.**  
 20 A. So I don't know how that's technically  
 21 defined, if that's income or not. And I'm also  
 22 retired medically from the military.  
 23 **Q. Okay. When did you retire from the**  
 24 **military?**  
 25 A. 2015.

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1 **Q. What -- tell me about your service.**  
 2 **When did it start?**  
 3 A. December of 1998.  
 4 **Q. How old were you then?**  
 5 A. 17.  
 6 **Q. Fresh out of high school?**  
 7 A. I was still in high school, actually.  
 8 **Q. Okay. Did you graduate from high**  
 9 **school?**  
 10 A. Yes, sir.  
 11 **Q. What high school?**  
 12 A. Pocatello High School.  
 13 **Q. And what branch in the military did you**  
 14 **join?**  
 15 A. Idaho Army National Guard.  
 16 **Q. So you served in the Guard from December**  
 17 **of '98 until 2015?**  
 18 A. The -- the short answer is no. So in  
 19 the military they give you a two-year IRR, is what  
 20 it's called, so that you can serve a mission or --  
 21 **Q. Okay.**  
 22 A. -- if you have some sort of medical --  
 23 medical issue.  
 24 **Q. Okay.**  
 25 A. So I took two years off, went to Japan

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1 as a missionary, came back. I got out of the  
 2 military for two or three years, somewhere in there,  
 3 and then rejoined again in 2009. So I want to say  
 4 from sometime in 2006 to the spring of 2009 I was not  
 5 in the military, but I reenlisted and then served  
 6 until 2015.  
 7 **Q. And was that still with the Idaho Army**  
 8 **National Guard?**  
 9 A. Correct.  
 10 **Q. Okay. Did you have a service-related**  
 11 **injury that caused your medical retirement?**  
 12 A. Yeah. So their -- well, other than just  
 13 being tall, we did a year in Iraq, and just sitting  
 14 in an up-armored Humvee, hunched over like this,  
 15 going over potholes, destroyed my lower back, so...  
 16 **Q. Oh, gotcha. So you served in Iraq for a**  
 17 **year?**  
 18 A. Yes, sir.  
 19 **Q. What year was that?**  
 20 A. November of 2004 to November 2005.  
 21 **Q. Okay. Do you have any post-high school**  
 22 **education?**  
 23 A. Yes, sir. I have a bachelor's in  
 24 criminal justice from Boise State. I have a master's  
 25 in safety and occupational health from Columbia

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1 Southern University.  
 2 **Q. What did you say that was in? Sorry.**  
 3 A. Columbia Southern University.  
 4 **Q. No, I got the university. I didn't**  
 5 **catch --**  
 6 A. Oh, sorry.  
 7 **Q. No, you're good.**  
 8 A. Sorry. Safety and occupational health.  
 9 **Q. Okay. Who pays you to do lobbying for**  
 10 **gun rights?**  
 11 A. The Idaho Second Amendment Alliance.  
 12 **Q. Anyone else?**  
 13 A. No, sir.  
 14 **Q. And where does the Idaho Second**  
 15 **Amendment Alliance get its money?**  
 16 A. From donations.  
 17 **Q. Okay. Aside from your military service**  
 18 **and your lobbying efforts, have you had any other**  
 19 **employment that we haven't talked about?**  
 20 A. That I'm currently making?  
 21 **Q. No. No, no, no. Ever. Let's just go**  
 22 **ever.**  
 23 A. Yes.  
 24 **Q. Okay. How recently?**  
 25 A. I ran the Idaho Dispatch until September

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1 of last year.  
 2 **Q. Tell me what that is.**  
 3 A. A news organization.  
 4 **Q. Is that an online news source?**  
 5 A. It is. We did do, at the time I was  
 6 there, one paper copy for paying subscribers.  
 7 **Q. Okay.**  
 8 A. But it was mostly just online.  
 9 **Q. Okay. So I take it, based on the name,**  
 10 **that's like an Idaho-based news?**  
 11 A. Correct.  
 12 **Q. Okay. What was your position there?**  
 13 A. The owner, CEO.  
 14 **Q. Okay. So you owned it?**  
 15 A. Correct.  
 16 **Q. Is it still in business?**  
 17 A. It is.  
 18 **Q. Who's operating it now?**  
 19 A. Miste Karl -- or, sorry, Miste Gardner  
 20 is her legal name.  
 21 **Q. Does she own it?**  
 22 A. Yes.  
 23 **Q. Did you sell it to her, or was there an**  
 24 **intervening owner?**  
 25 A. I sold it to her, yeah.

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1 **Q. Okay. Have you ever held local office?**  
 2 A. No.  
 3 **Q. Have you run for political office?**  
 4 A. Yes.  
 5 **Q. When did you run for office?**  
 6 A. I'm going to say 2016. I don't recall.  
 7 It was against -- I was a write-in candidate  
 8 against -- I can't remember her name.  
 9 **Q. Okay.**  
 10 A. And then --  
 11 **Q. What office were you running for; do you**  
 12 **recall?**  
 13 A. It would have been state representative.  
 14 **MR. SMITH:** What was it?  
 15 **THE WITNESS:** State representative. Sorry.  
 16 I'll speak louder.  
 17 **Q. BY MR. ALLEN: Do you recall what**  
 18 **district?**  
 19 A. 11.  
 20 **Q. Is that in the Caldwell area?**  
 21 A. Middleton. The -- at least under the  
 22 old district.  
 23 **Q. Okay. At the time it was --**  
 24 A. Correct.  
 25 **Q. Okay. Is that the only time you've run**

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1 **for office?**  
 2 A. Christy Perry was her name.  
 3 **Q. Okay.**  
 4 A. I just remembered.  
 5 I ran for precinct committeeman; does  
 6 that count?  
 7 **Q. Sure.**  
 8 A. That would have been in 2020.  
 9 **Q. Where was that at?**  
 10 A. When I was in Caldwell.  
 11 **Q. Okay. Do you have any plans to run for**  
 12 **office again?**  
 13 A. Not anytime soon.  
 14 **Q. Okay. Do you have any other involvement**  
 15 **in politics, aside from your lobbying efforts and**  
 16 **these two times you've run for office?**  
 17 A. I am a -- I am the state vice chair  
 18 currently of the Constitution Party of Idaho. I also  
 19 run a -- are you good? I don't want to --  
 20 **Q. Yeah.**  
 21 A. I also run a website that I just  
 22 reacquired called Second Amendment Daily News.  
 23 **Q. You say that you just acquired that?**  
 24 A. Reacquired.  
 25 **Q. When did you reacquire that?**

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1 A. Approximately two weeks ago, maybe.  
 2 **Q. Based on your use of the word**  
 3 **"reacquired," I take it that you owned it previously?**  
 4 A. Yes.  
 5 **Q. Okay. When did you own it previously?**  
 6 A. I want to say September of either 2021  
 7 or 2022. I can -- I can look that up, but I -- I  
 8 don't recall. I know it was in September.  
 9 **Q. That's when you stopped owning it?**  
 10 A. That's when I first started.  
 11 **Q. That's when you started. Okay.**  
 12 **So is it a -- is it an entity?**  
 13 A. I don't think we've officially filed  
 14 a -- you know, d/b/a or filed for an EIN or anything  
 15 like that. It was just kind of a website that we had  
 16 started to --  
 17 **Q. Basically a domain with content?**  
 18 A. Correct, that I can recall.  
 19 **Q. Okay. Okay. And you started it?**  
 20 A. Yes.  
 21 **Q. And then at some point in time you --**  
 22 **did you sell it?**  
 23 A. No. I didn't sell it. I just stopped  
 24 putting content on it. And I -- I don't remember the  
 25 name of the individual, but he works for Aaron Dorr,

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1 who is a friend of mine, and that individual kept  
 2 posting content on the website, but I kind of -- I  
 3 stopped paying attention to it and just was doing  
 4 other things.  
 5 **Q. Okay. And you said Aaron --**  
 6 A. Dorr, D-o-r-r.  
 7 **Q. Who is Aaron Dorr?**  
 8 A. A friend of mine.  
 9 **Q. Okay. And it was an associate of his**  
 10 **that kept posting content?**  
 11 A. Correct.  
 12 **Q. Is he still posting content now that**  
 13 **you've taken it over again?**  
 14 A. No. And I don't believe that individual  
 15 has since October of last year.  
 16 **Q. Okay.**  
 17 A. So it must have been 2021 when I started  
 18 it, that I can recall. But it was actually still  
 19 my -- my name was listed as an author in the  
 20 drop-down box, and he was still using my name, and I  
 21 actually didn't realize that at the time, so...  
 22 **Q. Okay. Would you be able to get his**  
 23 **name?**  
 24 A. Yeah.  
 25 **Q. Can you get that to your attorney and he**

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1 **can pass it along to us?**  
 2 A. Okay.  
 3 **Q. How did you first meet Mr. Christensen?**  
 4 A. Can you define "meet"?  
 5 **Q. How long have you known him?**  
 6 A. Since 20-- -- approximately 2015 or '16.  
 7 I don't recall exactly.  
 8 **Q. Is that about the time you had your**  
 9 **first interaction with him?**  
 10 A. Yeah. He -- he was running as a  
 11 candidate against Tom Loertscher in, I believe, 2016,  
 12 but I -- I likely knew his name before then but I  
 13 didn't -- I didn't know him. I probably had heard  
 14 his name. But I don't know that I met him until well  
 15 after that, just because I lived in Boise and didn't  
 16 come down there, so...  
 17 **Q. Okay. And that's really -- when I**  
 18 **say "known him," I'm talking about when you actually**  
 19 **met him and he would have said he knew you. Do you**  
 20 **recall when that was?**  
 21 A. I -- I don't recall when we first  
 22 actually met in person.  
 23 **Q. Okay. How would you describe your**  
 24 **relationship with Chad?**  
 25 A. We're -- you know, I would say a friend,

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1 but I would say a more accurate description would be  
 2 a close political acquaintance. I have been down  
 3 here for two years, and I think Chad and I went out  
 4 to lunch once. You know, so we don't -- we don't  
 5 hang out. We actually don't talk very often at all.  
 6 **Q. Are you affiliated in any way with the**  
 7 **Idaho Freedom Foundation?**  
 8 A. No.  
 9 **Q. Do you know if Chad is?**  
 10 A. I don't know.  
 11 **Q. Okay. I guess for purposes of**  
 12 **foundation, I'll ask the question even though I know**  
 13 **the answer: But are you familiar with Greg Graf?**  
 14 A. Yes.  
 15 **Q. Okay. When did you first become aware**  
 16 **of Mr. Graf?**  
 17 A. I don't recall a specific date or maybe  
 18 even year. I -- if I was ballparking it, maybe 2014  
 19 or '15 I heard his name.  
 20 **Q. Do you recall in what context?**  
 21 A. I don't.  
 22 **Q. Do you recall your first contact with**  
 23 **Mr. Graf?**  
 24 A. I don't remember when that would have  
 25 been.

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1 **Q. Okay. Do you recall anything about it?**  
 2 A. I don't -- I don't remember what our  
 3 first contact was or when it was.  
 4 **Q. Okay. Have you had any direct**  
 5 **interaction with Greg?**  
 6 A. Yes.  
 7 **Q. Okay. What do you recall about your**  
 8 **direct interaction with Greg?**  
 9 A. I don't recall a lot of specifics other  
 10 than either him commenting on things that I have said  
 11 before or me commenting on things that he has said  
 12 before. But this is my first time actually seeing  
 13 him in person.  
 14 **Q. Okay. When you say "commenting," are**  
 15 **you referring to online comments?**  
 16 A. Correct.  
 17 **Q. Okay. Where would that commenting have**  
 18 **taken place?**  
 19 A. Either on Facebook or Twitter, I would  
 20 presume.  
 21 **Q. Can you think of any other online**  
 22 **sources where either of you would have commented on**  
 23 **each other's content?**  
 24 A. Possibly on -- I -- I won't  
 25 say "possibly," because I can't think of anything

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1 else. But possibly on the Keep Idaho Free articles,  
 2 he may have posted something. I don't recall at this  
 3 time.  
 4 **Q. Okay.**  
 5 A. If he's using his real name, then I -- I  
 6 don't remember seeing anything on YouTube, and I  
 7 can't think of anywhere else off the top of my head.  
 8 **Q. What about on a site that Greg was**  
 9 **running called Idaho Conservatives? Do you recall**  
 10 **ever posting anything in response to articles that**  
 11 **were on Idaho Conservatives?**  
 12 A. I know I commented on the Facebook page.  
 13 I -- I don't recall if I posted on -- on the -- his  
 14 website directly. As he mentioned in deposition  
 15 yesterday, he saves everything that I say, it sounds  
 16 like. So he may be able to answer that better than  
 17 me.  
 18 **Q. Okay. How would you characterize the**  
 19 **exchanges between yourself and Mr. Graf online?**  
 20 A. Argumentative.  
 21 **Q. Okay. So would it be fair to say that**  
 22 **it's been fairly adversarial?**  
 23 A. We don't agree on much.  
 24 **Q. All right. We've talked a little bit**  
 25 **about the recording that's the main issue that brings**

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1 **us here today, or at least the -- the beginning of**  
 2 **what brings us here today. You've already told me**  
 3 **about how you came into possession of the recording.**  
 4 **You already told me that you gave a copy to Dustin.**  
 5 **Did you give a copy to anyone else?**  
 6 A. Yes.  
 7 **Q. Who else did you give a copy to?**  
 8 A. Parrish Miller.  
 9 **Q. I'm sorry?**  
 10 A. Parrish Miller.  
 11 **Q. Who is Parrish Miller?**  
 12 A. A friend.  
 13 **Q. Just a personal friend?**  
 14 A. I guess I -- what -- what else do --  
 15 what do you mean?  
 16 **Q. A professional friend.**  
 17 A. Yeah. He helps me with website content.  
 18 **Q. Okay. Where does he live?**  
 19 A. I think technically in Boise, the Boise  
 20 area.  
 21 **Q. Boise area. Okay.**  
 22 **What websites does he help you with**  
 23 **content for?**  
 24 A. The Second Amendment Daily News.  
 25 **Q. And that's the one you just reacquired,**

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1 **correct?**  
 2 A. Yeah. That's the one that he's  
 3 currently helping me on.  
 4 **Q. Aside from Second Amendment Daily News,**  
 5 **does he help you with website content from any other**  
 6 **websites?**  
 7 A. Correct.  
 8 **Q. What others?**  
 9 A. So currently GregPruett.com and  
 10 KeepIdahoFree.org. And then -- let's see.  
 11 PruetHikingAdventures.com, my kids' website.  
 12 **Q. Pruet Hiking Adventures?**  
 13 A. Yes, sir.  
 14 **Q. Is it safe to assume that that is not a**  
 15 **site that promotes political issues?**  
 16 A. That's a safe bet.  
 17 **Q. All right. So you said Second Amendment**  
 18 **Daily News, GregPruett.com, KeepIdahoFree.org. Any**  
 19 **others that Parrish Miller is involved with?**  
 20 A. Those are the current ones. He's helped  
 21 me with others previously.  
 22 **Q. Okay. What others has he helped you**  
 23 **with previously?**  
 24 A. So there would be Northwest Gun News.  
 25 Most of this is in discovery.

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1       **MR. WAYMENT:** Do you want to look at the  
2 discovery responses? They are in there, but...

3       **MR. ALLEN:** I'm fine if he wants to take a  
4 look at something that refreshes his recollection.

5       **MR. WAYMENT:** It's just his previous  
6 discovery responses.

7       **THE WITNESS:** I can either recall it from  
8 memory, but am I going to forget one? That's a  
9 possibility. Idaho Dispatch. There's one.

10       **Q. BY MR. ALLEN:** He did help you with the  
11 Idaho Dispatch?  
12       A. Yeah.

13       **MR. WAYMENT:** That's the copy that was  
14 served.

15       **THE WITNESS:** And I know that you had listed  
16 a -- a bunch that were by me and some that weren't by  
17 me in here. And that's all in the discovery that  
18 you'll have, but -- wait, no. This is -- this is  
19 Dustin's -- this is Dustin's with my name on it.

20       **MR. WAYMENT:** Oh.

21       **THE WITNESS:** This says Idaho Freedom stuff.  
22 But it has my name on it. Is this -- is that from my  
23 confusion that --

24       **Q. BY MR. ALLEN:** Here, maybe I can --  
25 maybe I can shorten this up. KeepIdahoFree.org.

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1       **That's your website, correct?**  
2       A. Correct.

3       **Q. Okay. Has that always been your**  
4 **website?**  
5       A. Yeah, essentially.

6       **Q. And you indicated that Parrish helps**  
7 **with that website?**  
8       A. Correct.

9       **Q. Okay. Is there a separate website**  
10 **called KeepIdahoFree.com?**  
11       A. We may have bought both -- I may have  
12 bought both domains at the time, or he did.

13       **Q. Okay.**  
14       A. But it's -- it's the same thing. Like  
15 it would redirect to dot-org if we didn't buy it.

16       **MR. WAYMENT:** Here's the list. This is from  
17 your discovery requests here.

18       **THE WITNESS:** Okay. Just see what you're  
19 looking at here.

20       **Q. BY MR. ALLEN:** So let's just -- let's  
21 just -- rather than -- I mean, you can keep that in  
22 front of you --  
23       A. Sure.

24       **Q. -- if you want, that's fine. But**  
25 **I'll -- we'll walk through them all.**

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1       **Idaho Second Amendment or IdahoSAA.org?**  
2       A. He does not.

3       **Q. Is that a website that you own?**  
4       A. I -- no. I --

5       **Q. Is that a website that you started?**  
6       A. Yes. The organization started that  
7 website.

8       **Q. Okay. So Idaho Second Amendment**  
9 **Alliance?**  
10       A. Yes, sir.

11       **Q. And that is an entity, correct?**  
12       A. Yes, sir.

13       **Q. You said that was a 501(c)(4)?**  
14       A. Correct.

15       **Q. And what's your role at that entity?**  
16       A. I am the president.

17       **Q. Okay. And you said you started it; is**  
18 **that correct?**  
19       A. That's correct.

20       **Q. Okay. And then I've got ISAAaction.org.**  
21 **Is that a website that you have anything to do with?**  
22       A. Okay. So I wanted to -- are we also  
23 talking about Parrish's involvement with the --  
24 that's what we were on, so I just want to --

25       **Q. Yeah. Let's just backtrack and let's**

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1       **just talk about you for a minute.**  
2       A. Sure. Okay.

3       **Q. So is that one that you have any**  
4 **interest in or involvement with?**  
5       A. So this will be in the discovery  
6 because -- so oftentimes with -- with -- especially  
7 with our gun websites, we'll purchase other domains  
8 that redirect. So, for instance, with the gun  
9 rallies, I have IdahoGunRallies.com that just  
10 redirects to our website and to specific content.

11       **Q. Okay.**  
12       A. So I don't remember purchasing  
13 ISAAaction.org, but our web gal may have purchased  
14 that for me at some point to use specifically, so...

15       **Q. Okay.**  
16       A. I don't recall.

17       **Q. And you said "web gal," is that just**  
18 **someone that does work for you to set up websites?**  
19       A. With the Idaho Second Amendment  
20 Alliance.

21       **Q. Okay. Solely with the Second Amendment**  
22 **Alliance?**  
23       A. She has other work, I assume, but we  
24 hire her to.

25       **Q. Okay. What's her name?**

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1 A. Deb -- Debra. I actually don't know. I  
2 call her Deb, and then Elliot.  
3 **Q. Okay.**  
4 A. I don't know how to spell --  
5 E-l-l-i-o-t.  
6 **Q. Okay. So we've got IdahoDispatch.com.**  
7 **That is -- I think you said that you had sold that?**  
8 A. Correct.  
9 **Q. Okay. Was that just a website, an**  
10 **entity?**  
11 A. That was an entity.  
12 **Q. Remind me when you said that you sold**  
13 **that?**  
14 A. September of last year.  
15 Let me correct that. August 31st, I  
16 think. She took over September 1st.  
17 **Q. Okay. NorthwestGunNews.com. Is that a**  
18 **website that you have an involvement with?**  
19 A. I -- I did have that website. It does  
20 not exist.  
21 **Q. Okay. And we covered GregPruett.com.**  
22 **You still have that. Parrish helps with that?**  
23 A. Correct.  
24 **Q. Okay. I mean, some of these are pretty**  
25 **self-explanatory, but what is the GregPruett.com**

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1 **website? What's it about?**  
2 A. For the most part I try to put anything  
3 that's, you know -- I try to keep the gun stuff,  
4 about what's happening with the Second Amendment  
5 Alliance. And so I have GregPruett.com, and started  
6 that primarily to talk about issues outside of guns.  
7 **Q. Okay. Idahoans For Liberty?**  
8 A. Yeah, no association with that.  
9 **Q. Okay. Have you ever had an association**  
10 **with that?**  
11 A. No.  
12 **Q. Do you know anything about it?**  
13 A. I don't.  
14 **Q. Okay. And IdahoansForLiberty.net, I**  
15 **assume the same?**  
16 A. Yeah, I don't. I didn't even know -- I  
17 think they have a Twitter account, but I don't -- I  
18 don't follow their stuff.  
19 **Q. Okay. WashingtonGunRights.org?**  
20 A. I did, when I started the Washington gun  
21 group a long time ago, but I no longer own or control  
22 that website.  
23 **Q. Can you tell me approximately when you**  
24 **stopped owning or controlling that website?**  
25 A. I -- the best that I can probably do

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1 right now is say a couple of years ago.  
2 **Q. Okay.**  
3 A. It's been a while.  
4 **Q. What about Protect43.com?**  
5 A. I have no association with that website.  
6 **Q. Okay. Are you familiar with it at all?**  
7 A. Yes.  
8 **Q. What is it?**  
9 A. I want to say the probably one or two  
10 times I went, they had a -- a voter guide posted on  
11 the website.  
12 **Q. Okay.**  
13 A. I think that they were endorsing  
14 candidates, and I checked that out some.  
15 **Q. Okay. But you don't have any personal**  
16 **affiliation with them?**  
17 A. No.  
18 **Q. Are there any other websites that you**  
19 **have created or are currently involved with that are**  
20 **not included in the list that we just discussed?**  
21 A. You want just political? I have a  
22 couple of other nonpolitical ones, if you want those  
23 too.  
24 **Q. Yeah, why don't you give me all of them**  
25 **and I'll decide which ones I want.**

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1 A. Sure. I have KristenPruett.com. That's  
2 my wife's -- she's a musician. That is her website.  
3 **Q. Okay.**  
4 A. And I do own the main -- I do own the  
5 domain for GregPruettArt.com.  
6 **Q. And is that it?**  
7 A. That is all that I can recall.  
8 **Q. Was there ever a website like "Greg**  
9 **Pruett for Idaho" when you were a candidate for**  
10 **office?**  
11 A. I believe I just used GregPruett.com to  
12 post content there.  
13 **Q. Okay.**  
14 A. Now, I may have purchased the domain but  
15 had it redirected to --  
16 **Q. Okay.**  
17 A. -- to my regular website.  
18 **Q. I want to explore a little bit -- just a**  
19 **second.**  
20 **How many of these websites have a**  
21 **separate presence on Facebook?**  
22 A. Currently Keep Idaho Free does, the  
23 Second Amendment Alliance does, Idaho Dispatch does,  
24 Northwest Gun News did. And for my own website, I  
25 do. I don't remember -- I think it's -- it could be

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1 Pruet for something else. Actually, for my personal  
 2 website, I think I just -- I may have just turned  
 3 that into my art thing, get my mind off politics a  
 4 little more. WashingtonGunRights.org does have a  
 5 Facebook page. 2A Daily News has one. My kids'  
 6 hiking channel has one. And Keep -- I think I said  
 7 Keep Idaho Free, but that's on there.  
 8 **Q. Does 2A Daily News have a separate**  
 9 **website as well?**  
 10 A. Yes.  
 11 **Q. What is the website for that one?**  
 12 A. 2ADailyNews.com.  
 13 **Q. It's a dot-com?**  
 14 A. Yes, sir.  
 15 **Q. And it does have a Facebook.**  
 16 **Are you the administrator over all those**  
 17 **Facebooks, or an administrator?**  
 18 A. Currently for the Second Amendment  
 19 Alliance, I am an administrator. For 2A Daily News,  
 20 Keep Idaho Free, my wife's page, my art page, my  
 21 hiking page. I have -- this is a little harder to  
 22 explain, but I'm not on Washington Gun Rights anymore  
 23 in terms of being an administrator. Years ago it was  
 24 put into a -- I'm not even sure how to explain this,  
 25 but it was put into -- there was a Facebook business

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1 side of it. And because I had owned it at the time  
 2 and owned ISAA, they were kind of lumped together.  
 3 And I've removed myself from Washington Gun Rights  
 4 because I don't -- I don't ever post on there, but it  
 5 still shows up in my --  
 6 **Q. Sure.**  
 7 A. -- in there, because it's tied to the  
 8 business. And I've actually been trying to work on  
 9 removing that from there.  
 10 **Q. Good luck.**  
 11 A. That's pretty much what I've been  
 12 running into.  
 13 **Q. Any other admins for Keep Idaho Free**  
 14 **besides yourself?**  
 15 A. I don't recall. Parrish Miller may be  
 16 an admin on there. Yeah. I -- I don't recall if he  
 17 is.  
 18 **Q. Okay. What about Idaho Second Amendment**  
 19 **Alliance?**  
 20 A. It's -- am I an admin on there?  
 21 **Q. No. Are there other admins besides**  
 22 **yourself?**  
 23 A. Yes. I...  
 24 **Q. Do you recall who any of them are?**  
 25 A. I believe Emily Fort. I believe

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1 Madeline Dorr. There's -- there's probably six or  
 2 seven. But I -- I don't remember definitively who is  
 3 and who is not on there. I -- but I can look it up.  
 4 **Q. Okay. Other admins for Second**  
 5 **Amendment -- or, excuse me, 2ADailyNews.com?**  
 6 A. That one, I believe, is just currently  
 7 me.  
 8 **Q. All right. Let's go back to the --**  
 9 **let's go back to the recording. So you gave a copy**  
 10 **to Dustin. You gave a copy to Parrish. Why did**  
 11 **you -- why did you give a copy to Parrish?**  
 12 A. I don't recall the exact reason why I  
 13 gave him the recording.  
 14 **Q. Okay. Did you anticipate that he would**  
 15 **help you generate any content related to the**  
 16 **recording?**  
 17 A. I don't recall why I gave him the  
 18 recording.  
 19 **Q. Okay. Did he help you generate any**  
 20 **content related to the recording?**  
 21 A. No.  
 22 **Q. Did you discuss it -- did you give it to**  
 23 **anybody else besides Dustin and Parrish?**  
 24 A. Yes.  
 25 **Q. Who else?**

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1 A. With the e-mails, I'm trying to recall.  
 2 I believe Neal Larsen and --  
 3 **THE WITNESS: I need to ask you a question.**  
 4 **Q. BY MR. ALLEN: Yeah, we can take a**  
 5 **break. I mean, we are kind of mid-question, but...**  
 6 A. I -- I don't recall outside of that.  
 7 **Q. Is it a concern related potentially to**  
 8 **attorney/client communications?**  
 9 A. Correct.  
 10 **Q. All right. If you gave it to an**  
 11 **attorney with respect to representation, I don't need**  
 12 **to know about that.**  
 13 A. Okay. Then that's...  
 14 **Q. All right. Anybody besides Dustin,**  
 15 **Parrish, and Neal Larsen?**  
 16 A. Not that I can recall at this time.  
 17 I've been combing through e-mails trying to see if I  
 18 forwarded it to Dustin.  
 19 **Q. Okay. What was your reason for giving**  
 20 **it to Neal Larsen?**  
 21 A. I don't know that I recall the exact  
 22 reason. But I -- you know, it -- to me, it was an  
 23 important story that he may have been interested in  
 24 covering.  
 25 **Q. Okay. Did you have a conversation with**

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1 **Neal Larsen at the time?**  
 2 A. I was trying to remember that last  
 3 night, if we ever even talked on the phone about it.  
 4 I -- I vaguely remember that we may have had a phone  
 5 call about it, but I -- I don't even know that he had  
 6 listened to it or not listened to it. Perhaps he had  
 7 just called me to ask what -- what was on it. But I  
 8 don't remember.  
 9 **Q. Okay. Do you recall if there was any**  
 10 **content in your e-mail when you sent it to Neal?**  
 11 A. That -- that e-mail will be turned over.  
 12 I don't remember if I --  
 13 **Q. You don't recall --**  
 14 A. -- added anything other than just  
 15 forwarding the audio.  
 16 **Q. Okay. Outside of the individual --**  
 17 **well -- yeah. Outside of the individuals that you've**  
 18 **identified that you disclosed it to or turned it over**  
 19 **to, did you discuss it with anyone else?**  
 20 A. At -- at the time most likely I probably  
 21 had phone conversations with people, but I don't --  
 22 **Q. Do you recall meeting them?**  
 23 A. -- remember.  
 24 I probably had a conversation with  
 25 Christy Zito, but that's just it, I guess. Yeah.

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1 A. Yeah. I want to say the first time we  
 2 talked -- I don't even remember -- I don't remember  
 3 when that was. After the recording that -- I  
 4 don't -- she didn't -- I didn't know her. So she was  
 5 trying to learn about who I was.  
 6 **Q. Okay. Anybody else that you can recall**  
 7 **discussing it with?**  
 8 A. Probably my wife.  
 9 **Q. Is that just a guess?**  
 10 A. That's -- I -- I am 99.9 percent sure I  
 11 talked to her about it.  
 12 **Q. Okay. Do you recall anything that you**  
 13 **discussed with her about it?**  
 14 A. I think I went over his, you know,  
 15 allegation that Chad was a sexual predator, his claim  
 16 to being an FBI agent, his attack on me in the phone  
 17 call, or talking about the NPR piece. Yeah, I  
 18 probably brought up some of the main points from  
 19 that --  
 20 **Q. Okay.**  
 21 A. -- from the recording.  
 22 **Q. Okay. Have you ever discussed the**  
 23 **specific allegations in the recording with Chad?**  
 24 A. Yes.  
 25 **Q. Okay. Have you discussed the --**

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1 And other than -- I assume other than the third --  
 2 the third-party defendants or -- you know.  
 3 **Q. Yeah. Did you discuss it with Chad?**  
 4 A. After he sent it?  
 5 **Q. After he sent it, yeah.**  
 6 A. I presume so.  
 7 **Q. You don't specifically recall what you**  
 8 **talked about?**  
 9 A. I don't.  
 10 **Q. Okay. Do you recall what you and Dustin**  
 11 **talked about?**  
 12 A. I don't specifically. I -- other than  
 13 maybe the FBI claim and the phone call was a  
 14 conversation that we were curious about. But, again,  
 15 that would be a presumption on my part that that was  
 16 something we had talked about.  
 17 **Q. Do you recall discussing it with EmmaLee**  
 18 **Robinson?**  
 19 A. We have talked about it, but I don't  
 20 recall the first time that we spoke on the phone  
 21 specifically about what was in -- or said on the --  
 22 on the recording.  
 23 **Q. Okay. So you recall that you did**  
 24 **discuss it. You just don't recall what you**  
 25 **discussed?**

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1 **specifically the text messages about -- the**  
 2 **allegation of text messages with inappropriate**  
 3 **advances with Chad?**  
 4 A. I believe I asked him if that stuff  
 5 existed.  
 6 **Q. Okay.**  
 7 A. I -- if I recall correctly, he denied  
 8 that that was there. I -- I didn't know.  
 9 **Q. Okay. Is that all that you remember**  
 10 **discussing about the text messages was just asking**  
 11 **him --**  
 12 A. Yeah, because we were -- we were trying  
 13 to put together an article.  
 14 **Q. Okay.**  
 15 A. And so obviously it's -- it's a very  
 16 long phone call, and there's a lot of allegations.  
 17 And so I was trying to find out from Chad what some  
 18 of the bases of the allegations were or if they were  
 19 baseless. So I don't know if we sat and -- I think  
 20 that I remember asking him, do you have -- do you run  
 21 the Idaho Three Percent. That was something that  
 22 Graf had alluded to in some context, so I asked Chad,  
 23 "Do you run the Idaho Three Percent?" And he said,  
 24 "No, I don't." I didn't think that was true, but --  
 25 **Q. Okay. Did he say anything about Adam**



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1 **Frugoli in that context?**  
 2 A. Yeah. I believe I asked him about Adam  
 3 Frugoli. I don't remember the exact questions, but  
 4 I -- I likely asked him about Adam Frugoli and if  
 5 there was -- like, I didn't really know Adam Frugoli.  
 6 I know I had heard the name, but I didn't know who he  
 7 was. I was actually told he was a friend of Graf's  
 8 at some point, that they were close. And so I just  
 9 said, "Who is Adam Frugoli and, you know, what does  
 10 he have on you, if anything?"  
 11 **Q. Did you ever talk to Adam?**  
 12 A. I've talked to him at some point since  
 13 then, but I could not -- I don't recall. I don't  
 14 believe I talked to him at all right after. It would  
 15 have been quite a while after, that I can remember.  
 16 **Q. Have you ever talked to him specifically**  
 17 **about the allegations of text messages?**  
 18 A. I don't know if it was that. I, again,  
 19 vaguely remember talking to him about his  
 20 relationship with Graf, more than his relationship  
 21 with Chad or -- or what was in there. But from what  
 22 I recall, Adam had denied that he had, I believe,  
 23 pictures or some sort of text messages with pictures  
 24 in them.  
 25 **Q. Okay. What did he tell you about his**

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1 **relationship with Graf?**  
 2 A. I -- I don't remember really. Just --  
 3 just that they were no longer friends or  
 4 acquaintances or whatever.  
 5 **Q. Okay. Do you recall anything else that**  
 6 **you and Chad discussed about the recording?**  
 7 A. Not -- not at this time.  
 8 **Q. Did you ask him at all about his career**  
 9 **in law enforcement?**  
 10 A. Not after the recording. I think when  
 11 he was running for office, I don't know if he -- I  
 12 don't remember if he was sheriff deputy or was in law  
 13 enforcement. I may have asked him at the time just  
 14 getting to know who he was. But as far as the call  
 15 on the recording, not that I know of.  
 16 **Q. Okay. Did you ask him about his**  
 17 **construction business?**  
 18 A. I asked him, I believe, about the  
 19 allegation that Graf made in the recording, but I  
 20 don't recall what Chad said.  
 21 **Q. Okay. Did you ask him about campaign**  
 22 **finance issues?**  
 23 A. I don't think we covered that one.  
 24 **Q. What -- what is your Twitter handle?**  
 25 A. Do you mean X? It's called X.

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1 **Q. Yeah. I'm aware that Elon Musk has an**  
 2 **obsession with X.**  
 3 A. I just -- I want the record to  
 4 reflect -- it is -- okay. I just had my -- so  
 5 GregAPruett.  
 6 **Q. And do you have any other Twitter**  
 7 **handles that you use?**  
 8 A. Not personally. I have -- the Second  
 9 Amendment Daily News has a Twitter account.  
 10 **Q. Do you post on that at all?**  
 11 A. Yes, sir.  
 12 **Q. Okay. What other Twitter -- Twitter**  
 13 **handles, X handles?**  
 14 A. Idaho Second Amendment Alliance, I post  
 15 our content on there, and then also Keep Idaho Free.  
 16 **Q. Are those all of the Twitter handles**  
 17 **that you currently use?**  
 18 A. Yes.  
 19 **Q. Do you have any others that you**  
 20 **previously used?**  
 21 A. I believe so. I don't know which ones  
 22 yet, but I assume that I had some before. I used  
 23 Facebook a lot more than I did Twitter. Idaho  
 24 Dispatch has one, but I obviously don't use that  
 25 anymore. I don't recall, like, if Northwest Gun

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1 News -- if I had one or if it didn't have one. I  
 2 don't remember.  
 3 **Q. Okay. How about Facebook accounts?**  
 4 **Obviously, you've got your personal Facebook account?**  
 5 A. Uh-huh.  
 6 **Q. Do you have any others? We've talked**  
 7 **about a few, so we'll check those off the list. Keep**  
 8 **Idaho Free, Idaho Second Amendment Alliance, Idaho**  
 9 **Dispatch, Northwest Gun News.**  
 10 **Was there a Greg Pruett for Idaho**  
 11 **Facebook page?**  
 12 A. Yeah. I believe earlier I had mentioned  
 13 that I changed the name of that page and just turned  
 14 it into my art page.  
 15 **Q. Okay.**  
 16 A. But there -- there was.  
 17 **Q. So the art page is the same account as**  
 18 **the former Greg Pruett for Idaho?**  
 19 A. Yeah. So Facebook started censoring  
 20 really hard, and my old page just -- I mean, it died.  
 21 It wasn't reaching anybody. And I believe that I  
 22 ended up deleting it quite a while ago, and then  
 23 tried to restart it again and just didn't feel like  
 24 maintaining my own personal political page. So I  
 25 turned it into my art page. So there wasn't --

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1 there's only like 400 people on there.  
 2 **Q. Okay.**  
 3 A. 477.  
 4 **Q. Okay. Any other Facebook pages that you**  
 5 **use that we haven't already talked about?**  
 6 A. No. I am an admin on the Rigby Trojans  
 7 Boys Soccer.  
 8 **MR. ALLEN:** Okay. All right. Let's get  
 9 into -- let's get into the articles now that were  
 10 generated as a response to Mr. Graf's conversation  
 11 with EmmaLee Robinson. Let's mark this as 11.  
 12 ([Exhibit 11](#) marked.)  
 13 (A recess was taken from 10:19 a.m. to  
 14 10:27 a.m.)  
 15 **Q. BY MR. ALLEN: All right. So you've**  
 16 **been handed what's been marked as [Exhibit 11](#). And I**  
 17 **noticed that there's a couple of blank pages in here.**  
 18 **I don't know if there's a function of the website**  
 19 **formatting or the way I've got my printer settings on**  
 20 **my computer. But do you recognize this?**  
 21 A. Yes, sir.  
 22 **Q. All right. Tell me what this is.**  
 23 A. An article about Mr. Graf and an audio  
 24 recording.  
 25 **Q. All right. So this is an article about**

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1 attorneys.  
 2 **Q. Anybody else?**  
 3 A. No, not that I -- not that I recall. It  
 4 was just me and Dustin.  
 5 **Q. Okay. I'm going to put in front of you**  
 6 **some of the exhibits from yesterday. Sorry about**  
 7 **that.**  
 8 A. No.  
 9 **Q. Take a look at Exhibit No. 3 there.**  
 10 A. Okay.  
 11 **Q. I think that it was represented**  
 12 **yesterday or suggested that this was the first**  
 13 **article. Does it look to you to be the same content**  
 14 **as is reflected in [Exhibit 11](#)?**  
 15 A. Yes. I see some of the same content  
 16 here.  
 17 **Q. Okay. Can you explain to me what the**  
 18 **difference is between Exhibit 3 and [Exhibit 11](#)?**  
 19 **Like, what -- what is this format? This is the**  
 20 **format that came from the web page. What is the**  
 21 **format that exists in Exhibit 3?**  
 22 A. I don't know the difference. I don't  
 23 know if this was -- was a draft or not a draft. I  
 24 don't know where this -- where did this come from?  
 25 **Q. It was produced yesterday by -- I think**

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1 **Mr. Graf and the recording that EmmaLee Robinson**  
 2 **made?**  
 3 A. The recording that EmmaLee Robinson  
 4 made, yes, sir.  
 5 **Q. All right. And who authored this**  
 6 **article?**  
 7 A. It's published by me on the website.  
 8 **Q. Okay. Did you write the content?**  
 9 A. I -- Dustin wrote the articles. I  
 10 believe that we both did editing. So I may have  
 11 wrote some of it. I couldn't tell you which parts I  
 12 had maybe edited and changed things or whatever. But  
 13 Dustin wrote the crux of the article, and then we  
 14 both kind of did some editing after that.  
 15 **Q. Okay. So it was a team effort?**  
 16 A. That --  
 17 **Q. Would that be fair?**  
 18 A. Yes. That would be fair.  
 19 **Q. And this was published on Keep Idaho**  
 20 **Free?**  
 21 A. Yes, sir.  
 22 **Q. Okay. Aside from yourself and**  
 23 **Mr. Hurst, did anybody else have any involvement in**  
 24 **the creation of this particular article?**  
 25 A. The article was reviewed by two

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1 **it was Mr. Smith that had that.**  
 2 A. Okay. I don't -- I don't know how he  
 3 produced it.  
 4 **Q. Okay.**  
 5 A. So, for instance, like on here, this has  
 6 got the YouTube link, it looks like, in here. So I  
 7 don't know what format he used to -- to produce that.  
 8 This looks like it was actually downloaded off the  
 9 web page versus potentially a draft. But I don't  
 10 know.  
 11 **Q. Okay. And I think that was produced in**  
 12 **Mr. Hurst's discovery response, so maybe that's a**  
 13 **better question for him.**  
 14 A. Okay.  
 15 **Q. Is it possible, though, that that's the**  
 16 **draft that you and Mr. Hurst were working on**  
 17 **exchanging with each other before you uploaded it to**  
 18 **the web?**  
 19 A. Potentially, just because where it says,  
 20 "Insert audio here," obviously that's not on the  
 21 website.  
 22 **Q. Right.**  
 23 A. It's the actual audio or the --  
 24 **Q. Right.**  
 25 A. -- videos or whatever you want to call

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1 it. But -- so that -- that would lead me to believe  
 2 it was a draft version, but -- yeah.  
 3 **Q. Does it look like a document that you**  
 4 **would have exchanged with Mr. Hurst?**  
 5 A. Potentially.  
 6 **Q. Okay.**  
 7 A. Potentially. I don't -- I look for  
 8 drafts. I didn't -- I couldn't find any of the  
 9 drafts. I found outlines that would be in discovery.  
 10 **Q. Okay.**  
 11 A. Outlines that I had made because I  
 12 listened to the audio, mostly outlined kind of what  
 13 was said and outlined what potentially was in the  
 14 article, so...  
 15 **Q. Okay.**  
 16 A. Yeah.  
 17 **Q. All right. As you look at this, do --**  
 18 **do you have any ability to discern what content is**  
 19 **your -- referring to Exhibit 11, do you have any**  
 20 **ability to discern what is your content versus Dustin**  
 21 **Hurst's content? Take your time to look it over.**  
 22 A. Can I mark on this if I need to?  
 23 **Q. Yes.**  
 24 A. Or not. I believe.  
 25 **Q. Actually, if you would, that would be**

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1 **great.**  
 2 A. Sure. Okay. Do you want me to go  
 3 through it page by page?  
 4 **Q. Yeah. Let's do page by page.**  
 5 A. Okay. So on the front page, update,  
 6 Mr. VanderSloot has sent me the following message,  
 7 that did come -- I wrote that, which obviously you  
 8 don't have it in here because this is the -- from the  
 9 website.  
 10 **Q. Right.**  
 11 A. "Update. Speaker Bedke sent me the  
 12 following message." I would've wrote that.  
 13 **Q. Okay. Let me stop you there for just a**  
 14 **second. It says "update" on both of those. Would**  
 15 **those have been inserted after the -- after the**  
 16 **article was first published?**  
 17 A. Correct. I -- yeah. Yeah, I -- the --  
 18 yeah. An update would apply. That came after. I  
 19 don't remember exactly.  
 20 **Q. Okay.**  
 21 A. But if I wrote "update," it likely came  
 22 after it was published.  
 23 **Q. Okay.**  
 24 A. Sorry.  
 25 **Q. No, you're good. Go ahead.**

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1 A. The third page, where it says "note," I  
 2 believe I wrote that.  
 3 **Q. Okay.**  
 4 A. Four, five -- I think this is page 6.  
 5 Page 6, this first paragraph looks more like my  
 6 writing. I believe I wrote this, because I was the  
 7 one that went to the Boise FBI office. But I -- I  
 8 have a question mark there, because I believe that  
 9 was me, but I don't know 100 percent.  
 10 **Q. Okay.**  
 11 A. Seven, eight -- page 9. Page 9, the --  
 12 the top line, "Keep Idaho Free reached out to Bedke,"  
 13 was most likely me, and I -- I presume, since I am  
 14 the one that reached out to them, that I wrote that  
 15 particular sentence.  
 16 **Q. Okay.**  
 17 A. The very last page, the note, I believe,  
 18 was also me.  
 19 **Q. Okay.**  
 20 A. And that's kind of what I've got.  
 21 **Q. Why did you write that note?**  
 22 A. Based on -- just based on my opinion on  
 23 listening to the phone call. I -- it was my opinion  
 24 that she wasn't being sincere in how she was talking  
 25 to -- she didn't do very much talking on the phone

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1 call, but from what little she did, it didn't sound  
 2 like maybe she believed Graf, but that's -- that was  
 3 just my opinion.  
 4 **Q. Okay. Will you take a look at Exhibit 4**  
 5 **real quick? Does that look like it's also still part**  
 6 **of Exhibit 11, the first article?**  
 7 A. Yeah. I think it's on page 10 or 11.  
 8 I'm not sure what page that is, but...  
 9 **Q. Okay.**  
 10 A. At least -- at least part of it is.  
 11 Hold on. Yeah, when you printed this off, it doesn't  
 12 look like some of this is in there. This whole one  
 13 is in here, right? And this here, but some of this  
 14 is not here.  
 15 **MR. WAYMENT:** It's cut off when you printed  
 16 it.  
 17 **THE WITNESS:** Yeah, when they printed it,  
 18 yeah, they printed it somewhere.  
 19 **Q. BY MR. ALLEN: Okay. So some of it is**  
 20 **the same content and some of it does not appear to**  
 21 **be?**  
 22 A. Yeah. When you printed it, it looks  
 23 like it cut off some of Mr. VanderSloot's quote.  
 24 **Q. Okay.**  
 25 A. It starts about here, but this part up

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1 here looks like it's missing from up there.  
2 **MR. WAYMENT:** And it doesn't look like it has  
3 any introduction either. I didn't see the  
4 introduction.  
5 **THE WITNESS:** Correct. Yeah. And that's not  
6 in this, and that's what I meant right in here.  
7 **MR. WAYMENT:** That "in fact."  
8 **THE WITNESS:** Yeah.  
9 **MR. WAYMENT:** Okay.  
10 **MR. ALLEN:** Okay. All right. Let's mark  
11 this one 12.  
12 ([Exhibit 12](#) marked.)  
13 **Q. BY MR. ALLEN:** Can you tell me what this  
14 one is?  
15 A. It's the second article in the four-part  
16 series.  
17 **Q. Okay. Sorry, I -- back to -- back to 11**  
18 **for just a quick second. You said that the paragraph**  
19 **referencing the FBI office in Boise was yours,**  
20 **correct?**  
21 A. I believe I --  
22 **Q. Or you believe it was?**  
23 A. -- said it was, yeah.  
24 **Q. Do you recall having a conversation with**  
25 **the Boise FBI office staffer?**

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1 A. We had a conversation through an  
2 intercom.  
3 **Q. Okay.**  
4 A. But yes.  
5 **Q. Have you had any -- any conversations**  
6 **with anybody else regarding Mr. Graf's**  
7 **representations about his communications with the**  
8 **FBI?**  
9 A. Yeah. So when I went to the Boise FBI  
10 field office to ask if Mr. Graf was employed or  
11 whatever, they basically told me to call the FBI tip  
12 line and -- and talk to them. And so I did that.  
13 **Q. Okay. And what did they tell you?**  
14 A. They -- not much.  
15 **Q. Okay.**  
16 A. They -- you know, "We'll look into it."  
17 Never heard back, I never followed up.  
18 **Q. Okay. So would it be fair to say that**  
19 **you don't have any actual knowledge about any**  
20 **communications that Greg has or has not had with any**  
21 **agents with the FBI?**  
22 A. Just what he mentioned in deposition  
23 yesterday.  
24 **Q. Okay. And I'm not referring to what he**  
25 **knows or what he believes. You personally, you don't**

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1 **have any knowledge --**  
2 A. I do not.  
3 **Q. -- about the subject matter?**  
4 **Okay. All right. So what is -- what is**  
5 **[Exhibit 12](#)?**  
6 A. That is Part 2.  
7 **Q. Part 2 of the article that was created**  
8 **related to the recording?**  
9 A. Yes, sir.  
10 **Q. And do you know who authored this**  
11 **Part 2?**  
12 A. Same as Part 1. Dustin wrote the  
13 articles. I likely did some editing, and then we  
14 published it.  
15 **Q. All right. So let me have you do the**  
16 **same exercise with this one and go through and mark**  
17 **each paragraph that was authored by you.**  
18 A. Okay. So I guess we have a problem  
19 because I -- maybe I should have caught that in here,  
20 but, like, the -- the whole thing isn't here because  
21 of the form -- how it came out for -- you see, like,  
22 all sorts of send, save, and then it goes to the next  
23 page, and you can kind of see now to the rest of the  
24 story. So I'm not -- there is no content.  
25 **Q. All right. The way it printed out?**

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1 A. Yeah.  
2 **Q. Why don't we do this. Why don't we take**  
3 **a break. I'll see if I can get copies that are**  
4 **complete, and then we'll go through this again.**  
5 A. Okay.  
6 **Q. And we may replace the existing exhibits**  
7 **if we can get a better printout.**  
8 A. Sure.  
9 (A recess was taken from 10:46 a.m. to  
10 11:12 a.m.)  
11 **MR. ALLEN:** All right. Let's go back on the  
12 record.  
13 **Q. BY MR. ALLEN:** So while we were off the  
14 **record, you went through and marked up a new**  
15 **[Exhibit 11](#) that we reprinted to correct some printing**  
16 **deficiencies from the original [Exhibit 11](#).**  
17 **In the process of remarking the new**  
18 **[Exhibit 11](#), did you find anything new that would have**  
19 **been your authorship versus Mr. Hurst's authorship?**  
20 A. Not that I saw.  
21 **Q. Did you take the opportunity -- or do**  
22 **you want to take the opportunity to see -- will you**  
23 **take the opportunity to see if there's anything that**  
24 **was not included in the badly printed [Exhibit 11](#) that**  
25 **is now this one that is your authorship?**

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1 A. Yes. Do you want me to read off the  
2 ones that we've remarked and which pages?  
3 **Q. First take a minute to just make sure**  
4 **there's not anything else --**  
5 A. Okay.  
6 **Q. -- and then we'll go through it.**  
7 A. Okay.  
8 **Q. Okay. Let's walk back through and just**  
9 **identify each one as -- from front to back.**  
10 A. Page 1, the update line.  
11 **Q. Okay.**  
12 A. I'm going to add that I would have been  
13 the one that inserted the quotes from other people.  
14 I didn't write the quotes.  
15 **Q. Okay.**  
16 A. The box that you see --  
17 **Q. The boxed?**  
18 A. The boxes.  
19 **Q. -- quotes?**  
20 A. Yeah. Okay. So both of those on page 2  
21 and then also the update in between those boxed  
22 quotes.  
23 **Q. Okay.**  
24 A. Note on the bottom of page 3.  
25 **Q. Okay.**

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1 A. Question mark on the last paragraph on  
2 page 4. I believe that was me, but I'm not  
3 100 percent sure.  
4 **Q. Okay.**  
5 A. The second to last paragraph on page 5,  
6 a question mark. And I believe I wrote that but not  
7 100 percent.  
8 Page 7, again, a question mark on "in  
9 fact," the fourth paragraph down.  
10 **Q. "In fact, in June of 2019, VanderSloot**  
11 **assured me he had urged Graf to remove himself from**  
12 **IdahoConservatives.com. Here's what VanderSloot**  
13 **wrote then." That paragraph?**  
14 A. Correct, I believe that was me. I'm not  
15 100 percent sure, but I believe it was.  
16 **Q. Okay.**  
17 A. I would have inserted that quote.  
18 **Q. Okay.**  
19 A. Same thing on page 8, I would have  
20 inserted the quote. And, yeah, the note on the  
21 bottom I believe was me. Question mark there. I  
22 believe that I wrote that, but -- and I think that's  
23 the rest of it, of the actual article.  
24 **Q. Okay.**  
25 A. Yeah.

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1 **Q. Let's keep that one in front of you for**  
2 **a minute.**  
3 A. Okay.  
4 **Q. Does it appear to you now to reflect a**  
5 **complete copy of the article?**  
6 A. This does appear to reflect a complete  
7 copy.  
8 **Q. All right. Let me have you turn to**  
9 **page 9 of the exhibit.**  
10 A. Okay.  
11 **Q. At the top -- near the top it**  
12 **says "tagged," and then there were several names,**  
13 **organizations, et cetera.**  
14 A. Sure.  
15 **Q. Are those tags that are created by you**  
16 **when you post the article?**  
17 A. When you are in -- publishing the  
18 article, there's a box for tags. So you have to  
19 type -- type those in there.  
20 **Q. Okay. So would you have created these**  
21 **tags?**  
22 A. Yeah, the tags would have -- would have  
23 been me as well.  
24 **Q. Okay. So other than the tags, the other**  
25 **items that you checked, and the handful that you put**

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1 **question marks next to, is all of this content Dustin**  
2 **Hurst's in origin?**  
3 A. As far as on the written portions?  
4 **Q. Yes.**  
5 A. As far as I know. I told my attorney  
6 that if I plugged Dustin's draft in there and the  
7 word "the" was missing an "E," I would have probably  
8 corrected that. But I -- I have no recollection of  
9 any potential grammatical changes.  
10 **Q. Okay. Is there a reason that Dustin was**  
11 **not given credit for authorship when it was posted?**  
12 A. I don't know why I chose to put my name  
13 on there instead of him.  
14 **Q. Okay. Turn to page 10, if you will.**  
15 **It appears that this reflects some**  
16 **comments that were made that your website is set up**  
17 **to allow people to leave replies; is that accurate?**  
18 **Is that what these are?**  
19 A. The website does allow people to leave  
20 comments, but I haven't reviewed -- I don't even know  
21 that I -- they're -- the way I have it set up is  
22 they'll automatically be posted.  
23 **Q. Okay.**  
24 A. So I don't go and filter them or  
25 whatever. So -- but it -- I assume these are posted

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1 on the article, but I haven't verified that.  
 2 **Q. Okay. It looks like most of the people**  
 3 **posting comments use either a pseudonym or just a**  
 4 **first name. As you look as these, can you identify**  
 5 **who any of these people are?**  
 6 A. I recognize the name David Lyon. I  
 7 don't know if that's the David Lyon that I --  
 8 **Q. Sure. Somebody using his name**  
 9 **potentially, yeah?**  
 10 A. -- that I know, yeah. Other than that,  
 11 I don't know that I know of any of these. Other  
 12 than -- all of the rest of these look like one first  
 13 name or fake names.  
 14 **Q. And would your website enable you to see**  
 15 **who it was that actually posted this content?**  
 16 A. I -- you know, I don't know. Possibly.  
 17 I know -- I don't know. Your client may know that  
 18 question better than me, honestly. I could -- I  
 19 could look but I don't know if it -- because I know  
 20 that I can delete the comment if I want. But I don't  
 21 know that there's any associated e-mail address or  
 22 anything like that.  
 23 **Q. Okay.**  
 24 A. I'd have to look.  
 25 **Q. Okay. Would you be willing to take a**

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1 **look at that and see, let your attorney know?**  
 2 A. Yeah.  
 3 **MR. WAYMENT:** Are you asking that he do it  
 4 right now, or are you asking --  
 5 **Q. BY MR. ALLEN: No, no, no, no, no.**  
 6 A. Oh, sorry.  
 7 **Q. Just --**  
 8 A. Yes.  
 9 **Q. -- when you get a chance, take a look**  
 10 **and let Mr. Wayment and Mr. Tolson know if, in fact,**  
 11 **you're able to identify who those people are, and**  
 12 **then who they are, if you are able to.**  
 13 A. Sure.  
 14 **Q. All right. I'll pass this one down now.**  
 15 **It's [Exhibit 12](#).**  
 16 **So we have [Exhibit 12](#) in front of you**  
 17 **now. Can you identify what that is?**  
 18 A. It is Part 2 of the articles based on  
 19 the recording.  
 20 **Q. Will you take a look and make sure that**  
 21 **it appears to be a complete copy of Part 2?**  
 22 A. I believe so.  
 23 **Q. Okay. Will you take a minute now and go**  
 24 **through and identify that portion of this document**  
 25 **that is your authorship?**

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1 A. It's all right. On page 7, the last  
 2 paragraph, I'm not seeing a continuation of -- or  
 3 maybe I'm just missing it. Sorry, I don't want to  
 4 be -- do you see what I'm saying?  
 5 **Q. I do.**  
 6 A. Like, clearly the sentence got cut  
 7 somewhere.  
 8 **Q. Why don't you take a look at Part 3 and**  
 9 **Part 4 and see if there's anything missing from that?**  
 10 A. You just want me to check for -- and see  
 11 if it's missing or if it's full?  
 12 **Q. Yeah.**  
 13 A. Okay. So these ones were good, right?  
 14 So I think 3 and 4 are good.  
 15 **MR. ALLEN:** All right. Let's go off the  
 16 record again for just a minute.  
 17 (A recess was taken from 11:33 a.m. to  
 18 11:49 a.m.)  
 19 **MR. ALLEN:** Let's go back on the record.  
 20 **Q. BY MR. ALLEN: All right. You now have**  
 21 **in front of you what's been marked as [Exhibit 12](#).**  
 22 **Does that appear now to be a complete copy of the**  
 23 **second article?**  
 24 A. It appears that way, yes.  
 25 **Q. Okay. And have you taken the**

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1 **opportunity to go through that and mark what you**  
 2 **authored?**  
 3 A. I did.  
 4 **Q. Will you tell us what you authored?**  
 5 **THE WITNESS:** Is everybody ready? I'll speak  
 6 loud for the hearing-impaired.  
 7 **MR. SMITH:** Thank you.  
 8 **THE WITNESS:** On page 2, the bold: "Claim 1:  
 9 Graf accuses the state legislator from District 32 of  
 10 being a sexual predator." That is mine. I would  
 11 have also inserted the YouTube video.  
 12 Page 3, the bold: "Claim 2: Graf  
 13 claims Chad Christensen runs an Idaho Three Percent  
 14 militia group," would have been mine. The one line  
 15 above the YouTube video, I believe, is also mine.  
 16 And I also inserted the YouTube video.  
 17 Page 4, the first paragraph, second  
 18 sentence, may have been me. That one's a question  
 19 mark.  
 20 **MR. DINDINGER:** Can you read the sentence?  
 21 Just --  
 22 **THE WITNESS:** Yeah, sorry. "Christensen has  
 23 confirmed to KIF he does not nor has he ever ran any  
 24 Three Percent group." The, "Claim 3," bold, "Graf  
 25 insinuates the legislator from District 32 is a

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1 racist." That, I believe, is mine. The bold,  
 2 "Claim 4: Does Graf intimate that Christensen's  
 3 beliefs and rhetoric will lead to Little's  
 4 kidnapping," question mark. I believe that is mine.  
 5 Page 5, I inserted the YouTube link.  
 6 The bold: "Claim 5: Graf claims that Christensen is  
 7 not stable." I believe that is mine.  
 8 Page 6, I inserted the YouTube link.  
 9 Page 7, the red box at the top: "Did  
 10 Jen -- Jennifer Ellis -- give you the idea?" That --  
 11 that paragraph, I inserted that quote. The bold text  
 12 in between: "Graf then follows that text message up  
 13 with an additional text," paragraph, that I believe  
 14 is mine. The red paragraph underneath that, that  
 15 quote, I would have inserted.  
 16 On page 8, the YouTube link or video,  
 17 whatever, I would have inserted. Bottom on the  
 18 notes, I definitely did note 3. The other two notes  
 19 are question marks. It looks like it's potentially  
 20 mine, but I don't -- I don't remember.  
 21 Page 9 and 10 is the letter that we got  
 22 from Mr. Allen. And I would have inserted those into  
 23 the article.  
 24 And then page 11, the tags in -- I would  
 25 have put the tags in. I think that is all.

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1 (A discussion was held off the record.)  
 2 MR. ALLEN: Back on the record.  
 3 Q. BY MR. ALLEN: Mr. Pruet, you just  
 4 identified what you authored or you believe you  
 5 authored, and you stated that everything else was  
 6 authored by Mr. Hurst?  
 7 A. To the best of my knowledge.  
 8 Q. Would anybody else have had input into  
 9 the content of Part 2 of the articles?  
 10 A. I had two attorneys review Part 2.  
 11 Q. Okay. Anybody else?  
 12 A. No.  
 13 Q. All right.  
 14 A. Not that I recall.  
 15 MR. ALLEN: Let's mark this as 13.  
 16 (Exhibit 13 marked.)  
 17 Q. BY MR. ALLEN: All right. You've been  
 18 handed what is marked as Exhibit 13. What does this  
 19 document appear to be?  
 20 A. This is Part 3 of the four-part series  
 21 based on the audio recording.  
 22 Q. Okay.  
 23 MR. SMITH: Are we missing one of these?  
 24 THE WITNESS: We should be on No. 3.  
 25 MR. SMITH: Okay. All right. So this is 13?

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1 Q. BY MR. ALLEN: Okay. Let me have you go  
 2 through the same exercise with respect to this  
 3 article.  
 4 A. Okay.  
 5 Q. And identify what you wrote versus what  
 6 Mr. Hurst wrote.  
 7 A. Okay.  
 8 Q. All right. Go ahead and tell us what  
 9 you authored in this particular part of the article.  
 10 A. Okay. Starting on page 2, the top line:  
 11 "Update: Representative Tammy Nichols" line would  
 12 have been me, most likely. I would have inserted the  
 13 quote directly beneath that, which is from her.  
 14 I don't know, maybe the fourth  
 15 paragraph -- I'm not sure how to describe it -- where  
 16 it says: "To review, read Part 1 here." The "read  
 17 Part 1 here" is probably mine, because it would have  
 18 been a hyperlink back to a different article. So I  
 19 presume that I would have added that in between  
 20 there.  
 21 Q. Okay.  
 22 A. Same thing in the next paragraph down in  
 23 Part 2, I would have added the hyperlink. I -- I  
 24 don't recall if I wrote -- actually wrote "read  
 25 Part 1 here," or whatever, but I know that I would

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1 have added the hyperlinks back to the previous  
 2 articles.  
 3 Page 3, I believe the top one is mine.  
 4 And I would have inserted the YouTube video.  
 5 Page 4, I would have inserted the  
 6 YouTube video.  
 7 Page 5, the bold paragraph, the second  
 8 paragraph: "Graf bizarrely claims that he and his  
 9 crew over at IdahoConservatives.com," that paragraph  
 10 is a question mark. That -- it may have been me. I  
 11 don't recall.  
 12 MR. SMITH: Excuse me, did you say page 3,  
 13 that bottom? Is that something you wrote?  
 14 THE WITNESS: I -- I don't believe so.  
 15 MR. SMITH: Okay.  
 16 THE WITNESS: Back on page 5, second to last  
 17 paragraph or whatever you want to call it, the bold:  
 18 "You can read the rest here," was probably me linking  
 19 to the -- I believe the Idaho Freedom Foundation, how  
 20 they rate a bill, whatever all those questions were.  
 21 Page 6, I believe -- I believe this is a  
 22 question mark that the last paragraph was mine. And  
 23 then I would have added the tags at the bottom of  
 24 page 6.  
 25 Q. BY MR. ALLEN: Okay. Let's go through

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1 the same exercise now with respect to Part 4. Take a  
 2 look at that and tell me if it looks like a complete  
 3 copy of Part 4.  
 4 (Exhibit 14 marked.)  
 5 THE WITNESS: I believe this is a full copy.  
 6 Q. BY MR. ALLEN: All right. Will you  
 7 mark, please, what you authored?  
 8 A. Okay.  
 9 Q. All right. Let us know what you  
 10 authored here.  
 11 A. Okay. Page 2, I inserted the YouTube  
 12 video.  
 13 Page 3, the bold: "Here's what Beck  
 14 told Keep Idaho Free," line, that is likely mine. I  
 15 also inserted the quote directly before that -- or,  
 16 excuse me, after. The bottom of page 3, a paragraph:  
 17 "In a deposition, Graf had to admit" -- that one, I'm  
 18 not sure if that was Dustin or mine.  
 19 The top of -- the top paragraph on  
 20 page 4: "However, Graf tells Christensen's private  
 21 employer," that paragraph is also a question mark and  
 22 not entirely sure whose that one was. I inserted the  
 23 YouTube video on page 4. The bottom paragraph on  
 24 page 4, the bold: "One commenter named John  
 25 Henager," paragraph, I'm not sure on that one.

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1 Between me and Dustin -- I inserted the  
 2 image right after that on page 5.  
 3 And then page 6, the paragraph -- I  
 4 guess fourth: "After listening to this audio  
 5 numerous times and trying to piece together all of  
 6 Graf's lies," that one, I'm not sure if it's mine or  
 7 Dustin's. It may be mine.  
 8 The next paragraph after that: "We hope  
 9 that you have learned as much as we have," paragraph,  
 10 that one's also a question mark. I'm not sure if  
 11 that was mine or Dustin's. And then the tags at the  
 12 bottom would have been in -- put in by me.  
 13 Q. All right. And would Dustin have been  
 14 the author of anything you didn't write?  
 15 A. Yes.  
 16 Q. Anybody else have any input into this  
 17 one?  
 18 A. I had two attorneys review the article.  
 19 Q. Okay. Tell me what the purpose of the  
 20 tags is.  
 21 A. I believe the purpose of tags is so  
 22 that, like, for instance, if I -- in order to find  
 23 the articles on my phone, I can type in "Greg Graf"  
 24 or "Doyle Beck" or "Greg Pruett" or whatever, and I  
 25 believe that helps -- helps them show up so I can --

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1 I can find them.  
 2 Like, if you go to the Keep Idaho Free  
 3 and you wanted to know any article written that has  
 4 Mr. Graf's name in it, you could type that in the  
 5 search, and I believe that that would pull up any  
 6 article that is on our site about -- or that may  
 7 contain his name.  
 8 Q. How much time did you put into the  
 9 creation of these articles?  
 10 A. I don't know.  
 11 Q. Okay. Any idea?  
 12 A. I guess, can you clarify? When you  
 13 say "creation of the articles" ...  
 14 Q. Well, from the time that you received  
 15 the recording to the time that these were published,  
 16 how much time did you invest in this project?  
 17 A. I -- I mean, I'm going to take a wild  
 18 guess and say a dozen hours, maybe.  
 19 Q. Okay.  
 20 A. I don't know.  
 21 Q. Okay. So more than ten?  
 22 A. Yeah. I would say more than ten.  
 23 Q. Okay. Less than 20?  
 24 A. Probably less than 20.  
 25 Q. All right. That gives us a range.

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1 A. Sure.  
 2 Q. And you've authored other articles about  
 3 Mr. Graf as well, right, or been involved in the  
 4 creation of?  
 5 A. Yeah. There's other articles on Keep  
 6 Idaho Free and maybe even GregPruett.com that have  
 7 either contained his name or -- I don't know if  
 8 there's any specific -- like this, but --  
 9 Q. I mean, these are very focused on him.  
 10 A. Correct. Yeah.  
 11 Q. All right. Are you familiar with the  
 12 Twitter handle "Greasy Greg Graf"?  
 13 A. A Twitter handle?  
 14 Q. Yeah. A Twitter profile that uses that  
 15 name.  
 16 A. I have never had a Twitter profile where  
 17 the handle was "Greasy Greg Graf."  
 18 Q. Are you familiar with one, though? Have  
 19 you ever seen one?  
 20 A. Not that I remember. I know a number of  
 21 people have used that name, but I don't remember a  
 22 specific Twitter handle where there could've been --  
 23 sure.  
 24 MR. ALLEN: Okay. Let's mark this as 15.  
 25 (Exhibit 15 marked.)



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1 **Q. BY MR. ALLEN: Can you tell me what this**  
 2 **is?**  
 3 A. It looks like a Facebook post.  
 4 **Q. Okay. Is this from your Facebook page?**  
 5 A. This I believe is from a -- it looks --  
 6 probably from my Facebook profile, not the page. But  
 7 I could be wrong.  
 8 **Q. Okay.**  
 9 A. I don't -- I don't recall.  
 10 **Q. Okay. Do you recall posting this?**  
 11 A. I -- it looks like mine.  
 12 **Q. Okay. Is this related in any way to the**  
 13 **articles we just reviewed?**  
 14 A. Yeah, this is probably right before or  
 15 as we were talking to Stephanie Mickelsen on KID.  
 16 **Q. Okay. And what was the purpose of this**  
 17 **post?**  
 18 A. We were talking to Stephanie Mickelsen  
 19 about the articles in question.  
 20 **Q. Okay.**  
 21 A. So I let whoever was on my profile -- if  
 22 it -- if it was for my profile, then I was letting  
 23 them know I was talking about Mr. Graf.  
 24 **Q. Just so we get a clear record: Would**  
 25 **that have been Stephanie Lucas?**

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1 probably where the -- so the post on Keep Idaho Free  
 2 and then, yeah, it looks like it's a share to my  
 3 page.  
 4 **Q. Okay. So you're cross-promoting this**  
 5 **across multiple streams?**  
 6 A. I shared it from one public page to  
 7 another public page. So if you mean on the same  
 8 platform, then, yeah, that's on the same platform.  
 9 **Q. Okay. Let's mark this as next.**  
 10 **(Exhibit 17 marked.)**  
 11 **Q. BY MR. ALLEN: All right. Do you**  
 12 **recognize this one?**  
 13 A. Yes. Yeah. It looks like mine, my  
 14 page.  
 15 **Q. So with respect to this and the prior**  
 16 **Exhibit 17, would you have you been the person that**  
 17 **published or posted the article to the Keep Idaho**  
 18 **Free Facebook page?**  
 19 **MR. WAYMENT: I think that you meant the**  
 20 **prior Exhibit 16, right?**  
 21 **Q. BY MR. ALLEN: With respect to both,**  
 22 **yes, the prior Exhibit 16, Exhibit 16 and 17, would**  
 23 **you have been the person that posted the article to**  
 24 **the Keep Idaho Free Facebook page?**  
 25 A. Yeah.

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1 A. Oh, yeah. What did I say?  
 2 **Q. Stephanie Mickelsen?**  
 3 A. Sorry. Correct. Yes.  
 4 **Q. That's okay.**  
 5 **Stephanie was referenced in the last**  
 6 **article that you -- Stephanie Mickelsen was**  
 7 **referenced in the last article that you referenced.**  
 8 **MR. ALLEN: Let's mark this as next.**  
 9 **(Exhibit 16 marked.)**  
 10 **Q. BY MR. ALLEN: Do you recognize this?**  
 11 A. Yes.  
 12 **Q. Tell me what this is.**  
 13 A. This looks like a post from when I had  
 14 a -- so the Greg Pruett for Idaho would have been the  
 15 Facebook page; Keep Idaho Free is a Facebook page.  
 16 **Q. Okay.**  
 17 A. Sharing, it looks like, Part 4.  
 18 **Q. Okay. And what would the point of this**  
 19 **post have been?**  
 20 A. To share the latest article that we had  
 21 put together.  
 22 **Q. Okay. And it looks like you posted both**  
 23 **from Keep Idaho Free and then shared that again from**  
 24 **Greg Pruett for Idaho; is that accurate?**  
 25 A. Yeah, it looks like underneath is

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1 **Q. Okay. Would you also have been the**  
 2 **person who posted it to the Greg Pruett for Idaho**  
 3 **Facebook page?**  
 4 A. Yes.  
 5 **Q. Okay. Did you promote the articles by**  
 6 **publishing them in -- or posting about them anywhere**  
 7 **other than Keep Idaho Free and Greg Pruett for Idaho?**  
 8 A. I -- yeah, I presume so. I -- do I  
 9 remember all of them? He -- he probably does.  
 10 **Q. Okay. Do you remember -- do you**  
 11 **remember any?**  
 12 A. Yeah. Well, it's possible that I posted  
 13 them on Twitter. But I -- I don't -- I don't recall  
 14 if I did. If I did have a Twitter handle, then I  
 15 probably did at that time. Facebook, Twitter, those  
 16 would have been the two social media platforms that I  
 17 would have posted on if I did.  
 18 **Q. Okay. Did you also post about this**  
 19 **article on YouTube?**  
 20 A. I don't remember if I posted about the  
 21 article. But I posted -- as you saw in the -- in the  
 22 articles, there's YouTube, the audio -- the audio  
 23 that came from the -- the full audio, those clips are  
 24 all -- were all posted on YouTube. I don't remember  
 25 if I, you know, did a video where I was talking about

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1 it. I may have or I may not. I -- I don't remember.  
 2 **Q. Okay. Do you recall anything else that**  
 3 **you did to promote this story?**  
 4 A. I think it was sent out in a couple of  
 5 e-mails that I remember.  
 6 **Q. Did you -- you mentioned Stephanie**  
 7 **Mickelsen inadvertently. But did you talk to**  
 8 **Stephanie Mickelsen at all about the -- the recording**  
 9 **or the articles?**  
 10 A. I did not, no.  
 11 **Q. What about Jennifer Ellis? Did you talk**  
 12 **to Jennifer Ellis at all?**  
 13 A. I -- I did -- not about the -- I've gone  
 14 back and forth with her on -- when -- when it was the  
 15 Idaho Conservatives page, I know I've had  
 16 communication with her. But I don't think we had any  
 17 communication about the articles, but I -- not that I  
 18 recall.  
 19 **Q. As you were in the process of creating**  
 20 **them, did you have any communication with Doyle Beck**  
 21 **about them?**  
 22 A. Yeah. Yeah. Because one of the  
 23 articles I had to get a quote about the accusation  
 24 that Mr. Graf had made against him.  
 25 **Q. Did you contact him, or did he contact**

Page 86

1 **you?**  
 2 A. I believe I reached out to him to ask  
 3 him about...  
 4 **Q. Do you recall the substance of that**  
 5 **conversation?**  
 6 A. We talked about the accusation of -- I  
 7 can't remember, it was something about a tomato plant  
 8 and some money that had been moved around or  
 9 allegedly moved around somehow. We talked about  
 10 that. And that's why -- I think in the -- whichever  
 11 article had this stuff about Doyle Beck, there was  
 12 also something about his previous deposition and  
 13 stuff. And I don't remember if that came up with me  
 14 or if Dustin had talked to -- to Doyle. I don't  
 15 remember on that. But we definitely talked about the  
 16 tomato plant accusation, whatever it is.  
 17 **MR. ALLEN:** Okay. I'm going to suspend this  
 18 one for the rest of the day until we can get the  
 19 discovery, because I don't want to not have time for  
 20 Mr. Christensen.  
 21 **THE WITNESS:** Sure.  
 22 **MR. ALLEN:** So I'm going let you go at this  
 23 point in time, but reserving the right to recall you  
 24 once we have the e-mails, et cetera, that's coming in  
 25 the discovery responses.

Page 87

1 **THE WITNESS:** Okay.  
 2 **MR. ALLEN:** Okay?  
 3 **MR. WAYMENT:** We're working on those. We'll  
 4 try to get them to you by the end of the week.  
 5 **MR. ALLEN:** Okay. Excellent.  
 6 **THE WITNESS:** And they're not asking me  
 7 questions, I assume?  
 8 **MR. ALLEN:** They can if they want to.  
 9 **MR. OBORN:** Yeah. I'd like to ask a few  
 10 questions.  
 11 **EXAMINATION**  
 12 **BY MR. OBORN:**  
 13 **Q. So, Mr. Pruett -- well, let's start with**  
 14 **Exhibit 11.**  
 15 **So page 8 --**  
 16 A. Okay.  
 17 **Q. -- at the bottom, I think you said you**  
 18 **inserted that note there; is that correct?**  
 19 A. I believe I did. I put a question mark.  
 20 I believe that was me.  
 21 **Q. Okay. Did you have any communication**  
 22 **with EmmaLee Robinson about that before you inserted**  
 23 **that into the article?**  
 24 A. No. No. Not at all.  
 25 **Q. When -- did you know EmmaLee Robinson**

Page 88

1 **before this recording was made?**  
 2 A. I did not.  
 3 **Q. Did you ever have any communication with**  
 4 **EmmaLee Robinson before the recording of the phone**  
 5 **call with Gregory Graf about her recording the phone**  
 6 **call with Gregory Graf?**  
 7 A. No.  
 8 **Q. Okay. Did -- did you have any**  
 9 **conversations with Dustin Hurst or Chad Christensen**  
 10 **about EmmaLee Robinson recording her conversation**  
 11 **with Gregory Graf before she recorded the**  
 12 **conversation with Gregory Graf?**  
 13 A. None.  
 14 **Q. Before -- did you know that EmmaLee**  
 15 **Robinson was going to have a conversation with**  
 16 **Gregory Graf before the recording was made?**  
 17 A. I did not.  
 18 **Q. Did EmmaLee Robinson provide any**  
 19 **content -- other than the recording itself, did**  
 20 **EmmaLee Robinson provide directly to you any**  
 21 **information or anything else that was used in the**  
 22 **articles?**  
 23 A. No.  
 24 **Q. Did she have any editorial authority**  
 25 **over the content of the articles?**

Page 89

1 A. No.

2 **Q. Did you seek her approval before the**

3 **articles were posted?**

4 A. I did not.

5 **Q. The -- are -- is any of the opinions**

6 **about the content of the recording there in the**

7 **articles, are those opinions or statements taken from**

8 **EmmaLee Robinson?**

9 A. No. You mean like the note at the end

10 here?

11 **Q. No, like the actual content of the**

12 **articles itself, where it evaluates the -- what was**

13 **said in the recording.**

14 A. Sorry. Can you repeat the -- the

15 original question just so I'm clear?

16 (Requested portion of record read.)

17 **THE WITNESS:** Oh. No.

18 **Q. BY MR. OBORN: So the opinions in the**

19 **article are either your opinions for the portions**

20 **that you drafted or opinions by Mr. Hurst?**

21 A. Correct. Yeah.

22 **MR. OBORN:** I don't have any other questions.

23 **MR. SMITH:** I have no questions.

24

25

Page 90

1 **MR. DINDINGER:** I just have a couple.

2 **EXAMINATION**

3 **BY MR. DINDINGER:**

4 **Q. Greg, did you have any communications**

5 **with Chad Christensen about anyone making a recording**

6 **of Mr. Graf prior to the publication of these**

7 **articles?**

8 A. No.

9 **Q. Or prior to you coming into possession**

10 **of the recording? Maybe I should say that.**

11 A. No.

12 **Q. Okay. Does Chad Christensen have or did**

13 **he ever have any ownership or control over the Keep**

14 **Idaho Free website?**

15 A. No.

16 **Q. Okay. Did Chad play any role in**

17 **authoring these articles that we've just discussed?**

18 A. No.

19 **Q. Did Chad play any role in publishing**

20 **these articles that we've just discussed?**

21 A. No.

22 **Q. Okay. And did you seek Chad**

23 **Christensen's consent or approval for each or any of**

24 **the articles prior to publishing them?**

25 A. No.

Page 91

1 **MR. DINDINGER:** Okay. That's all I have --

2 **Q. BY MR. DINDINGER: Oh, actually, I do**

3 **have one more. I apologize.**

4 **Mr. Pruett, you were in the deposition**

5 **of Mr. Graf yesterday, weren't you?**

6 A. Yes.

7 **Q. All right. Do you recall Mr. Graf's**

8 **testimony -- I believe it was an accusation that you**

9 **had published an unflattering photo of him. Do you**

10 **recall that testimony?**

11 A. I -- I remember discussion about -- that

12 he had talked about the -- the ownership of this

13 photo. But I don't remember -- I don't remember the

14 unflattering photo comment.

15 **Q. And the only reason I ask is I was just**

16 **wondering if -- and I see there's several different**

17 **permutations of this photo here. But if this photo**

18 **that's prominently featured on the first page of**

19 **Exhibit 11 might have been the one that Mr. Graf was**

20 **discussing. Do you have any idea?**

21 A. To my knowledge, that was the only photo

22 I think that we ever knew existed of him. And that

23 was why that one was used.

24 **MR. DINDINGER:** That's all I've got. Thank

25 you.

Page 92

1 **MR. ALLEN:** I've just got one more follow-up

2 question.

3 **FURTHER EXAMINATION**

4 **BY MR. ALLEN:**

5 **Q. Do you still have Exhibit 11 there in**

6 **front of you?**

7 A. Yes, sir.

8 **Q. So at the bottom of page 3, there's a**

9 **note that you indicated you put in, correct?**

10 A. Yes.

11 **Q. And it says: "Note: A previous version**

12 **of this audio was edited to remove the name of an**

13 **individual who works for Melaleuca and is not part of**

14 **this story."**

15 **Did I read that correctly?**

16 A. Correct.

17 **Q. Do you recall who that individual was?**

18 A. I believe from the audio it was Tony

19 something. Tony -- Tony -- some guy that works high

20 up in Melaleuca, I believe, but his name was Tony.

21 And I didn't really feel like his -- his name being

22 in there -- in the article and published -- or excuse

23 me, in that video was -- so I think that we had just

24 bleeped it out or cut it when his name was mentioned

25 so that he wasn't part of that.

1 Q. And, in fact, EmmaLee Robinson  
2 specifically asked you to not include Tony's name in  
3 the article, correct?

4 A. I don't remember.

5 Q. You don't remember?

6 A. I don't recall, yeah. Yeah.

7 MR. ALLEN: All right. That's all.

8 THE COURT REPORTER: I just need to know if  
9 we're doing a read and sign and if we're doing the  
10 same orders as yesterday.

11 THE WITNESS: Sure. Yeah.

12 MR. WAYMENT: Send it to Aaron.

13 MR. DINDINGER: Electronic only with the  
14 exhibits on this one.

15 MR. ALLEN: Same as yesterday.

16 MR. OBORN: Same order for me.

17 MR. SMITH: Same as yesterday. No order.

18 MR. WAYMENT: If we can get an electronic  
19 copy, that would be helpful.

20 (The deposition concluded at 12:32 p.m.)

21  
22  
23  
24  
25

1 REPORTER'S CERTIFICATE

2  
3  
4  
5  
6

STATE OF IDAHO                    }  
COUNTY OF BONNEVILLE        }    ss.

7 I, Sheila T. Fish, CSR, RPR, CRR, and Notary  
8 Public in and for the State of Idaho, do hereby  
9 certify:

10 That prior to being examined Greg Pruett, the  
11 witness named in the foregoing deposition, was by me  
12 duly sworn to testify to the truth, the whole truth,  
13 and nothing but the truth;

14 That said deposition was taken down by me in  
15 shorthand at the time and place therein named and  
16 thereafter reduced to typewriting under my direction,  
17 and that the foregoing transcript contains a full,  
18 true, and verbatim record of said deposition.

19 I further certify that I have no interest in the  
20 event of the action.

21 WITNESS my hand and seal this 15th day of August  
22 2023.

23  
24  
25

Sheila T. Fish  
Idaho CSR No. 906,  
Notary Public in and for  
the State of Idaho

# Keep Idaho Free

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## legislator fired. (Part 1)

OCTOBER 30, 2020 GREG PRUETT



262

✓

Exhibit No.	11
Date:	8/1/23
T&T REPORTING	

Hi Greg. Thanks for the heads up. That's nice of you to let us know. I appreciate that. I have been somewhat aware of Greg's political antics in the past. I am not aware of anything that he's done in the last several months. We have warned Greg to leave Melaleuca out of his personal endeavors. He is entitled to his own feelings. But they are different than mine and different than Melaleuca's. I do not agree with Greg's approach. And he is not allowed to suggest to anyone that either I or Melaleuca condone or agree with his political position or activities.



I do not know Mr. Graff nor have I ever met him. If he is using my name or making references to me being involved in the aforementioned group, he is doing it without my knowledge or permission. I am not affiliated with the group.



A member of Melaleuca's executive team went to unusual lengths to punish a political foe, an audio file handed over to Keep Idaho Free reveals.

The audio file, a recorded phone conversation between Melaleuca's Greg Graf and state Representative Chad Christensen's employer, reveals just how far Graf is willing to go to harm liberty-minded state lawmakers.

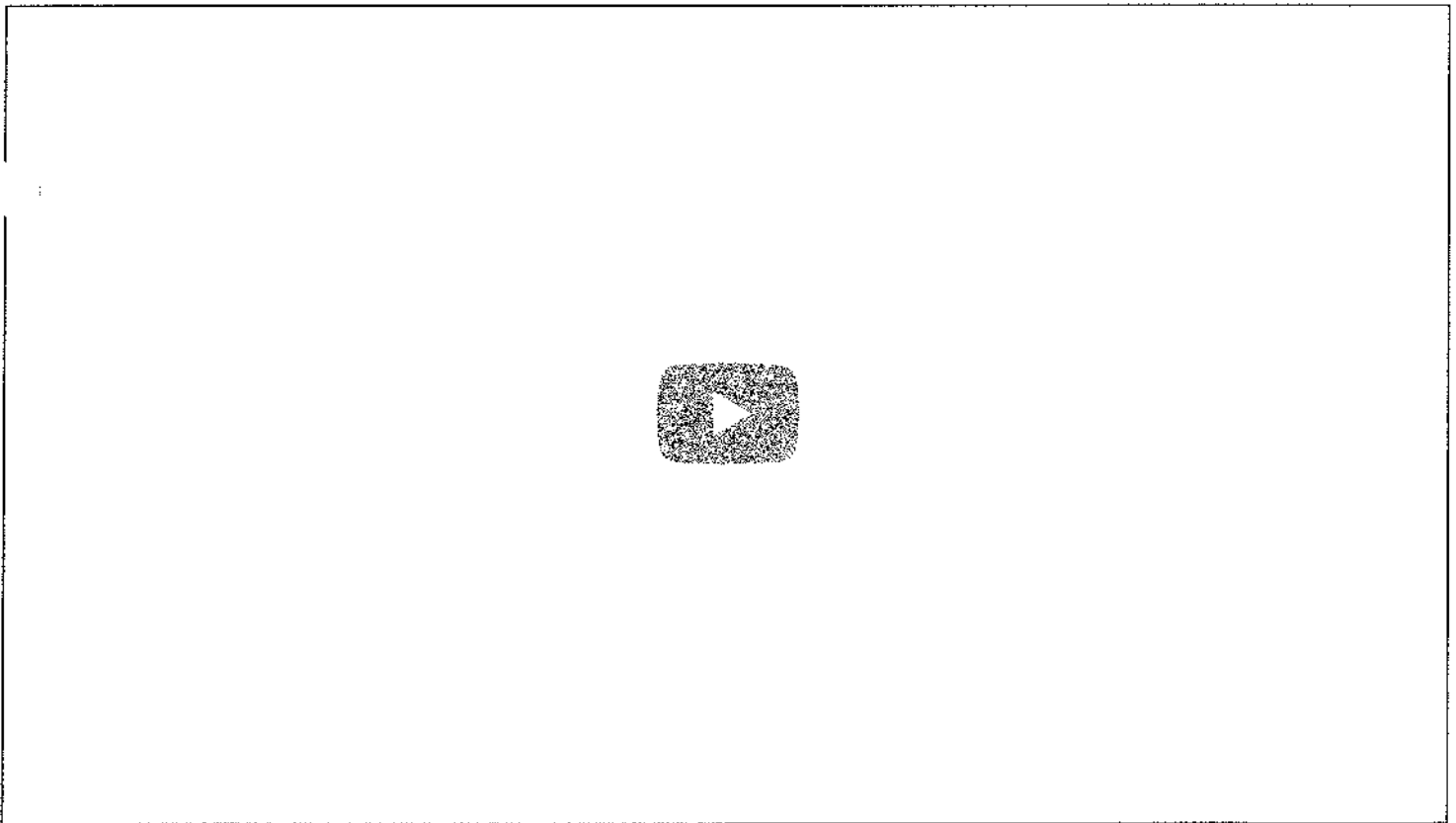
In the recorded call, Graf lobbs several salacious accusations at Christensen and even discusses a scheme the employer might deploy to oust Christensen from his employment.

It's important to put Graf's efforts in proper context. We'll do that in this article, and then detail in the next article just how Graf attempted to smear Christensen, a Republican lawmaker from District 32.

On his carefully manicured social media pages, Graf looks the part of a corporate professional. His LinkedIn page lists him as the "Online Reputation Management & Global SEO Expert" for Melaleuca, a multi-level marketing firm based in Idaho Falls. That firm is owned by Frank VanderSloot, Idaho's only billionaire.

It is in the shadows, in my opinion, that Graf reveals himself as something far darker. He represents the worst of American politics and incivility. In my opinion, he's a political mercenary whose sights and skills are used to smear conservatives who disagree with Graf's moderate political philosophy.

**According to his LinkedIn page, Graf specializes in reputation management, competitive intelligence, search engine optimization, and more. In the call with Christensen's employer, Graf touts his title, and boasts that he is a member of Melaleuca's executive office.**



https://www.youtube.com/watch?v=...  
...  
... ✓

It's unclear if Graf's claim to executive status is real or imagined to gain favor with Christensen's employer.

To be sure, complaining to a state lawmaker's employer about the legislator's politics isn't a heinous offense. It's happened in the past and will continue far into the future.

What shocked the senses is just how far Graf is willing to go, and how many lies he is willing to tell, to harm Christensen and others.

**For example, Graf tells Christensen's employer that when the Federal Bureau of Investigation needs to know something in Idaho, he is the agency's main point of contact.**



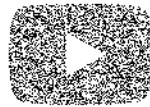
Keep Idaho Free visited the Boise FBI office and shared with an employee there Graf's story. The staffer couldn't comment directly on Graf's claim, but said that the claim sounds like a scam.



The Boise staffer suggested Keep Idaho Free refer the matter to an FBI tip line. KIF did submit the matter to the agency's reporting line, but the federal bureau has not responded as of this writing.

Graf likely inserted that nugget, regardless of its veracity, to further build his clout with Christensen's employer.

**He wasn't done there, though. No, Graf claimed his organization has close ties to several of Idaho's political leaders, including House Speaker Scott Bedke and Governor Brad Little.**



Keep Idaho Free reached out to Bedke and Little to verify the claims, but neither has responded. 2

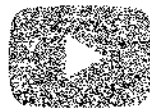
In the next article, we will meticulously detail why Graf felt the need to gain the trust of Christensen's employer. In short, Graf needed to earn that trust to persuade the employer to end Christensen's employment. More on that in the next article.

## Exhibit C

For now, what's important to understand is that this unethical tactic serves as nothing more than another front for Graf's political operation, an apparatus built to destroy the Idaho second Amendment Alliance, the Idaho Freedom Foundation, and any lawmakers who don't bow to Graf's political bullying and harassment.

And to be clear, Graf isn't alone in the years-long offensive on those who want to limit government and protect Idaho's way of life.

After starting a website called "IdahoConservatives.com" he quickly enlisted the help of his allies in the offensive, Stephanie Mickelsen and Jennifer Ellis. The two establishment Republicans live in Bonneville and Bingham County respectively. IdahoConservatives.com is a landing page for Graf's unique brand of hatred, harassment, gaslighting, and manipulation.



Throughout the phone call, Graf bizarrely and falsely claims that IdahoConservatives.com somehow discredited the Idaho Freedom Foundation's legislator scorecard, the Freedom dex. Graf also admits that the site's purpose is to attack lawmakers he labels as "far-right."

That list includes Rep. Christensen, Rep. Tammy Nichols of Middleton, Rep. Bryan Zollinger of Idaho Falls, Rep. Christy Zito of Hammett, Rep. Julianne Young of Blackfoot, and others.

Graf reaffirms on the call that Ellis, too, has close ties to Bedke and Little.

To be clear, Keep Idaho Free does not claim here that Bedke, Little, Melaleuca, or VanderSloot have anything to do with Graf's unethical assault on his political foes.

**In fact, in June of 2019, VanderSloot assured me that he had urged Graf to remove himself from IdahoConservatives.com. Here's what VanderSloot wrote then:**

However, several months ago we learned of Greg's involvement with the organization called Idaho conservatives. Since we use Greg on some of our social media endeavors we asked him to cease his involvement with that organization because we were concerned that someone might confuse his personal endeavors with our own views. Several months ago Greg committed to us that he would cease his active involvement with Idaho Conservatives. We believe he has done that. That was difficult for him since he was a founder of that organization. But he has promised us that he would no longer be involved with providing content to that site. I believe he has honored that commitment.

When asked for clarification on the timeframe of VanderSloot asking for Graf's pledge to step away from the dishonest attack website, he delivered more detail:

According to our records the exact date of our asking Greg to cease any involvement with Idaho Conservatives was January 24th, 2019. Greg came back and asked us for 30 days to unwind his involvement with them. We gave him those 30 days. That would mean his involvement should have stopped at the end of February 2019. He has consistently represented to us that he faithfully kept that commitment. I have not been paying attention to Idaho Conservatives' site nor to your site, nor to any similar or affiliated sites so I cannot speak to some of your other comments. But, to date, we have had no reason to disbelieve Greg's promise to us that he has not been involved with Idaho Conservatives since the end of February.

From the audio, Graf indicates that he helped write an article titled the "Foundation of Fear" which was released on April 24th, 2019. The article has the name of "Jennifer Ellis" as the author but the audio we obtained suggests Graf had at least some part in putting that article together.

The audio shared with Keep Idaho Free also indicates that Graf has not honored his pledge to step away from IdahoConservatives.com. He mentions that he is the "behind the scenes intelligence gatherer" while Ellis runs the "day to day" operations and that it is "his" organization. It's unclear if VanderSloot, who was trying to protect his company's brand in 2019, has given his blessing for Graf's return to political shenanigans.

There's far more to reveal here. Graf makes several salacious, bizarre, and untrue claims about Christensen in the call. Unbelievably and without corroborating evidence, Graf alleged that Christensen is a sexual predator. We'll write about that in Part 2 of this series, which Keep Idaho Free plans to publish soon.

NEWS

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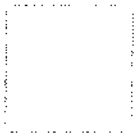
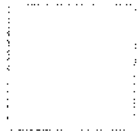
Idaho Supreme Court Gun Case is Monumental

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# THOUGHTS ON "REVEALED: HOW ONE MELALEUCA "EXECUTIVE" TRIED TO GET AN IDAHO LEGISLATOR FIRED. (PART 1)"



1/1/23

1. The first thing I noticed when I read the article was that it was a very well-written and detailed account of the events that transpired. The author did a great job of providing context and background information, which made the story much more interesting and easy to follow.

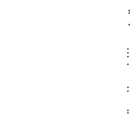
2. I was also impressed by the way in which the author presented the evidence. The article was well-organized and easy to read, and the author did a great job of providing a clear and concise summary of the events that transpired.



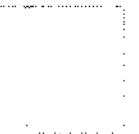
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Exhibit C



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# Exhibit C

## TOPICS

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# Exhibit C

## Keep Idaho Free

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### with Lies and "Gun-Free Zones" (Part 2)

NOVEMBER 2, 2020 GREG PRUETT



109

Idaho's political sphere is chock full of backbiting, gossip, and all other sorts of treachery, deflection, and deception.



### Exhibit C

No one takes the game farther, in my opinion than one Gregory Graf. And, my guess is, you won't believe how far this master manipulator is willing to go to punish a political enemy.

In part 1 of this series, we outlined the first step Graf, an online reputation manager for Melaleuca, took to harass state Rep. Chad Christensen: Graf called Christensen's employer and immediately sought to build rapport with the employer; and Graf made all sorts of sensational claims, all without evidence, to gain trust with the boss.

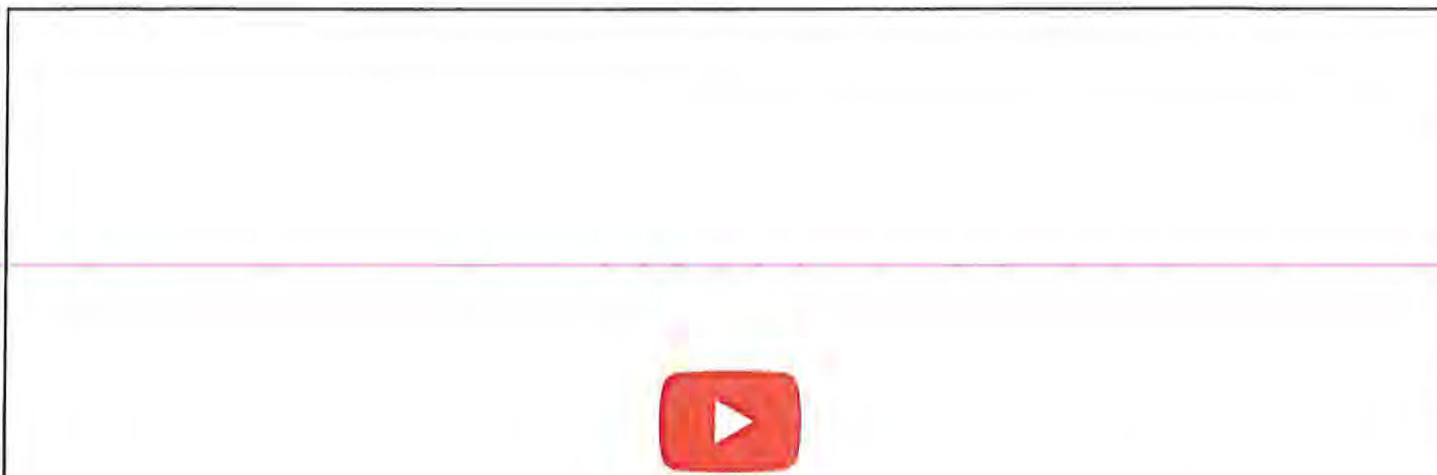
For example, Graf claimed a tight connection with House Speaker Scott Bedke of Oakley. Bedke told Keep Idaho Free that he's never heard of Graf. Read Part 1 for a detailed rundown of Graf's rapport-building claims.

Now, to the rest of the story.

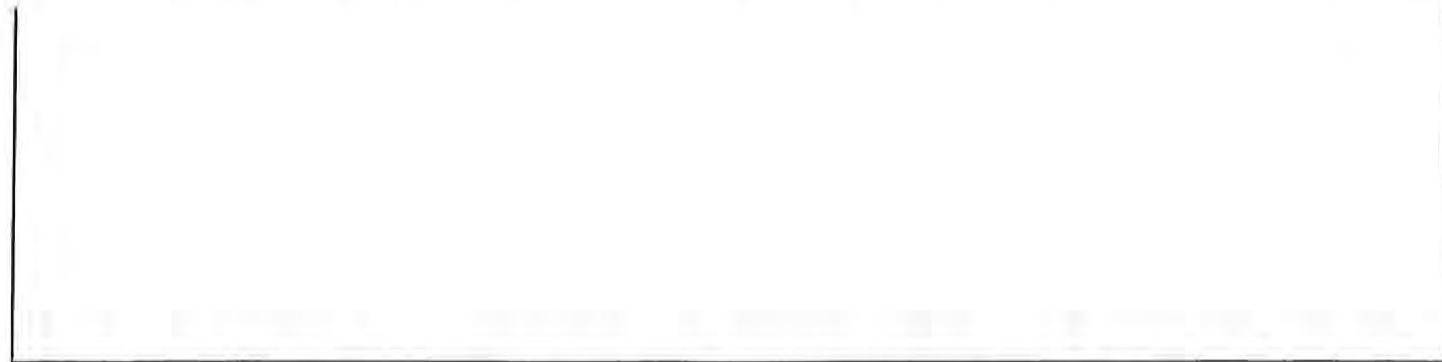
In this article, we'll look at how Graf violated ethical and moral norms to attempt to get Christensen fired. There are several salacious and false claims put forth by Graf. Here we go.

#### **Claim 1: Graf accuses the state legislator from District 32 of being a sexual predator.** ✓

No, it really happened. During the recorded call, Graf told Christensen's boss that her employee is a sexual predator. He pretends this is true, and benevolently offers a bogus story to the employer as a warning. Their office, as KIF understands it, is all-female, except for Christensen. Graf understands that, too. So, he plays the role of savior to the females with this false claim.



## Exhibit C



At this point, you might wonder if Graf knows something you don't. *Is that state lawmaker dangerous?*

That's a fair question. Let us answer it: No. How do we know?

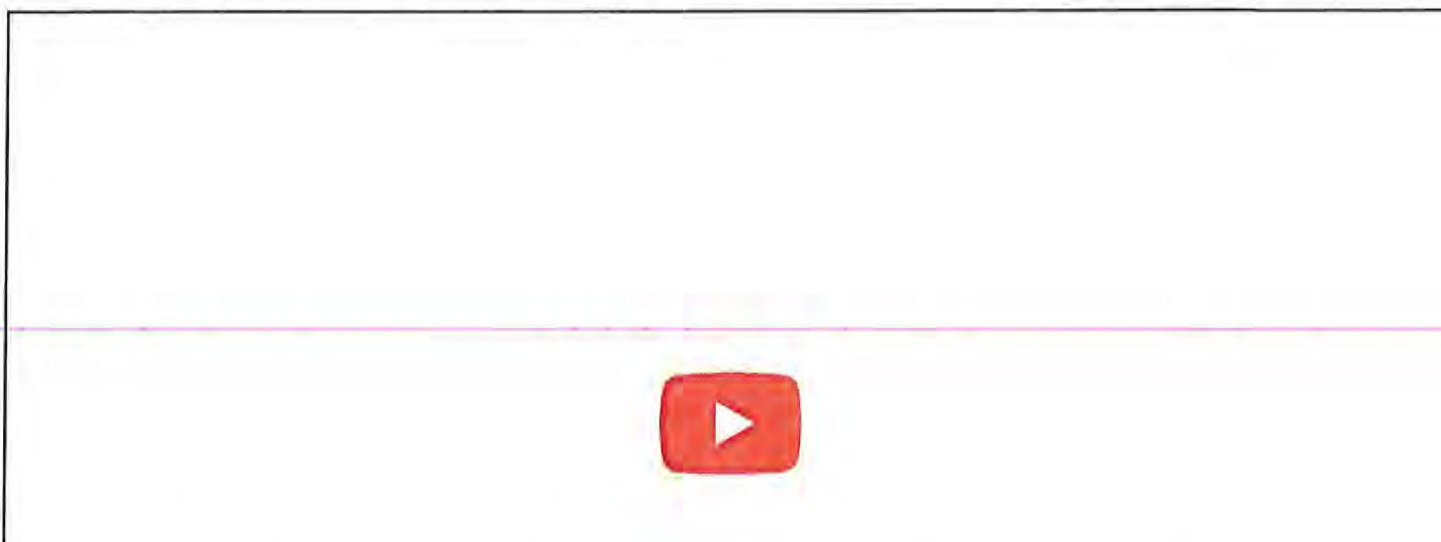
Graf himself later admits that he doesn't actually have any evidence to back up his claim.

This is when Graf and Jennifer Ellis hatch a new plot to get Christensen fired. More on that in a moment.

### **Claim 2: Graf claims Chad Christensen runs an Idaho 3% militia group. ✓**

Let us first say there would be nothing wrong with Christensen aligning with the 3%. For the most part, Three Percenters, as they are known, are patriotic, humble people who care deeply about America's future. Of course, there are some bad eggs in the basket, but that's true of any group.

Listen to the link below to Graf's claim that Christensen runs a "militia" group: ✓



## Exhibit C

The problem with this claim is that it's simply not true. Christensen has confirmed to KIF he does not, nor has he ever ran any 3% group. ?

### **Claim 3: Graf insinuates the legislator from District 32 is a racist** ✓

Ah, the old race card. Usually, people on the left pull this one. Maybe that Graf pulls this card says more about him than it does about Christensen. Unlike Graf, though, we won't speculate!

Graf, again lacking evidence, insinuates Christensen is a racist.

Graf spends a lot of the phone call making wild accusations against what he calls the "far-right network" and discusses the Aryan Nations and Idaho 3% groups containing "racists" in their organizations.

Graf's goal, in my opinion, was to convince Christensen's employer that groups who have racists in them, or actual racist groups like the Aryan Nations are the type of groups Christensen wants to be a part of. While he makes no direct accusation of Christensen being a "racist" on the phone call, the insinuation is very obvious in addition to the many other direct attacks on Christensen.

### **Claim 4: Does Graf intimate that Christensen's beliefs and rhetoric will lead to Little's kidnapping?** ✓

First, a question: Is there anything Graf won't say?

But seriously, this intimation is flatly false. Yes, Christensen has been a vocal opponent of Gov. Brad Little and his administration's handling of the Covid-19 response. Still, Christensen has used his voice and platform to encourage civic action and engagement. That's it.

## Exhibit C

Graf offers no evidence at all that Christensen has ever made such a threat against Gov. Brad Little or anyone else for that matter. It was simply another false claim that Graf tried to use to convince Christensen's employer to fire him.

Prior to insinuating that Christensen's rhetoric and beliefs will lead to kidnappings of people like Governor Little, Graf leads Christensen's employer into the claim by discussing a variety of other individuals and the assumption being that Christensen is just like them? You decide. Take a listen.



For the record, Christensen denied Graf's silly intimation.

### **Claim 5: Graf claims that Christensen is not stable** ✓

At this point, Graf has made so many claims against Christensen that it is hard to keep track of everything he is spreading about the state lawmaker to his employer.

Insinuating someone is a racist or that they may kidnap the governor is already pretty outlandish without some sort of hard evidence to back up your claim.

## Exhibit C

Graf then says that Chad is "not stable" directly to the employer.



Who makes this type of claim without some evidence to back it up?

That's it for Graf's most outlandish and false claims against Christensen. But, there's still more to this plot, as we alluded to in the beginning of this article.

After Graf's failure to provide any evidence that the legislator from District 32 is a "sexual predator," Graf and his friend Jennifer Ellis of "Idaho Conservatives" encourage Christensen's boss to implement a "gun-free zone" at the office, knowing that Christensen, a principled Second Amendment supporter, would likely violate such a ban.

Graf and Ellis also suggest that the employer mandate facemasks at the office, which would also help set up Christensen for termination by his employer.

---

Here is what Graf tells Christensen's boss in a text:

Exhibit C

Did Jen [Jennifer Ellis] give you the idea about requiring masks at your office and no guns at work policy? Where I work [Melaleuca] that is the policy, no weapons and masks at all times. Nobody can fault you for taking safety seriously.

**Graf then follows that text message up with an additional text about giving Christensen's boss cover for implementing a "gun-free zone":**

You could approach this a[s] you to be more aligned with what larger companies in Idaho Falls are doing and you want to take covid and safety seriously. Regardless of the situation, it's still not a bad thing to do anyway.

This plan is not only disgusting but is certainly not something a conservative or Republican would ever push.

Another shocking revelation from the phone call is when Graf also admits that someone from the Idaho Conservatives group may have been at least partially responsible for getting Chad fired from his previous job at Farm Bureau.

Stephanie Mickelson, who was named in our previous article as a member of the Idaho Conservatives group, is a board member at Farm Bureau. Graf claims on the phone call that Stephanie raised "red flags" about Chad when he was hired on to the Farm Bureau team. It is unclear at this time what role Mickelson may have played in Christensen's termination from Farm Bureau.



## Exhibit C



✓

Fast forward to today and now the group is targeting Chad's new employer. Will this "Idaho Conservatives" group ever let Christensen live his life or do they intend to get him fired from every job he gets and will they do even more to try and make it happen?

Despite these outlandish claims against Rep. Christensen, Graf wasn't done yet with his attacks on those he calls the "far-right." He also says that 22 Idaho legislators are like a "mafia" and that they are part of a dangerous and organized crime network. He also names a number of legislators and other candidates for public office he says he "advised." We detail all of that in Part 3.

## Notes:

1. On the call, Graf claims to be a Melaleuca executive, likely in an attempt to build clout with the employer. Frank VanderSloot, Idaho's only billionaire, told KIF that he was not aware of Graf's actions and does not endorse them. 2
2. Idaho House Speaker Scott Bedke has also denied knowing Greg Graf and has also denied that he has any involvement in the "Idaho Conservatives" group. 2
3. Graf's attorney sent Keep Idaho Free (to me personally) a cease-and-desist letter and the same letter to Christensen's employer. You can see that here. KIF remains committed to revealing the truth about Graf's unethical behavior. Harassment or intimidation via legal channels will not deter us. ✓

Exhibit C



Jared W. Allen  
2105 Coronado Street • Idaho Falls, ID 83404  
Phone (208) 557-5218 • Fax (208) 529-9732  
allenj@beardstclair.com

VIA FAX and EMAIL

October 30, 2020

[Redacted]  
[Redacted]  
[Redacted]

Greg Pruett  
president@idahosaa.org

Fax: [Redacted]  
email: [Redacted]

**Re: Gregory Graf; Defamation and Fraud  
Cease and Desist**

Dear [Redacted] and Mr. Pruett:

It has come to our attention that communications between [Redacted] and our client, Greg Graf, surreptitiously recorded by [Redacted] under false pretenses, are now in the possession of Mr. Pruett. It has also come to our attention that Mr. Pruett intends to publish portions of those communications, undoubtedly in a way that will portray Mr. Graf in a false light, a deliberate attempt to smear and defame our client. We will not sit idly by and allow this entrapment scheme to unfold without consequences. The purpose of this letter is to demand that you cease and desist the use of [Redacted] recording to spread mis-information, and that you refrain from engaging in the publication of defamatory representations about our client.

[Redacted] contacted our client representing that she was concerned about things she had heard about Chad Christensen (Chad) and inquiring whether Mr. Graf had information about Chad. She specifically represented that the purpose of her inquiry was to confirm rumors she had already heard and address whether Chad, as her employee, was a potential threat to staff. I want to be very clear, because I have reviewed [Redacted] prior correspondence in which you try to spin it that Mr. Graf came to you. The evidence clearly establishes that [Redacted], not Mr. Graf initiated the contact. It further establishes that [Redacted] created the appearance of concern and specifically requested information about Chad's history and character. It now appears that such concern was merely false pretense.

Even assuming, arguendo, that [Redacted]'s initial concerns were genuine, which appears increasingly unlikely, Mr. Pruett has or should have knowledge that: (a) [Redacted] initiated the contact with Mr. Graf; (b) [Redacted] solicited information about Chad's history and

Attorneys licensed in  
Idaho Colorado Montana New York North Dakota Washington Wyoming Utah

Exhibit C

Jared W. Allen	John M. Avondet	Michael W. Brown	Jeffrey D. Brunson	Gregory C. Calder
Dan C. Dummer	Joseph D. Faifrank	Jain D. Hammer	Herbert J. Heimerl III	Melissa O. Heimerl
Thomas J. Holmes	Megan J. Hopfer	Lindsay M. Lotgran	Kristopher D. Meek	Lance J. Schuster
Michael D. Gaffney of Counsel	F. Scott Lee of Counsel	Jack H. Robinson of Counsel	John G. St. Clair of Counsel	Julie Stomper of Counsel

October 30, 2020 – Page 2

character; and (c) Mr. Graf merely provided information in response to ██████████'s inquiry. ██████████'s subsequent emails, coupled with Mr. Pruett's publication about "Idaho's October Surprise!" strongly suggests you intend to spin this situation to suggest that Mr. Graf contacted ██████████ for political purposes and to somehow harm Chad. Any such suggestion is patently false and defamatory.

In addition to the foregoing, we have serious concerns about the impact your actions may have on Mr. Graf's relationship with his employer. Your actions may prove to be detrimental to his employment relationship, in which case you may be liable for interference with that relationship.

✓

In the event you publish information relating to the exchange between Mr. Graf and ██████████ in such a way that portrays Mr. Graf in a false light or otherwise sullies his reputation, you can expect to be hailed into court to answer for ██████████'s fraud and Mr. Pruett's defamation. Should Mr. Graf's employment be compromised, you can anticipate a claim for tortious interference with contract. Rest assured that in the process of pursuing those claims we will engage in vigorous discovery to uncover the full scope of this entrapment scheme, including Chad's involvement.

Govern yourselves accordingly.

Sincerely,

Jared W. Allen

Enclosures as stated

cc:

NEWS

CHAD CHRISTENSEN FARM BUREAU FRANK VANDERSLOOT GOVERNOR BRAD LITTLE  
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MICKELSON ✓

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## "Organized Crime?" (Part 3)

NOVEMBER 11, 2020 · GREG PRUETT



### 22 Idaho Legislators - Organized Crime?

**Update: Rep. Tammy Nichols has sent us the following message about this article:** ✓

I was not present at the events at the Capitol regarding the caucus meeting concerning Rep. Green, as Mr. Graf implies in his phone conversation. I was out of the state at the time this occurred. I also am not part of any "organized crime", nor "dangerous", nor "far-right" (whatever that means), nor any of his other legations that he states, and find his accusations of myself and others insulting and defamatory. ✓

In recent articles, Keep Idaho Free has exposed one Gregory Graf, a political operative, for his use of — at the very least — questionable tactics to punish his political enemies.

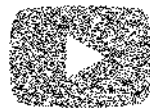
To review, read part 1 here, where KIF details how Graf made several big, and likely false, claims about his connection to Gov. Brad Little, the Federal Bureau of Investigation, and Idaho House Speaker Scott Bedke, a Republican from Oakley.

In part 2, KIF dropped a bombshell that details how far Graf will go to inflict pain on his adversaries. In short, Graf will stop at almost nothing to harm politicians with which he disagrees. If you read any other piece in this series, make it this one. You won't believe the lines Graf crosses to try to destroy state Rep. Chad Christensen, R-Ammon.

In this installment, KIF will show that Christensen, while Graf's main obsession, is hardly the political hit man's only target. And, we'll look at Graf's allies in the war against principled state lawmakers.



**In our research, we've found that Graf claims he has advised or worked for Rep. Britt Raybould, Rep. Doug Ricks, Rep. Rod Furniss, David Radford, and Senator-elect Kevin Cook.** ✓



With the exception of Radford, each of the aforementioned politicians has waged war on conservatives in the past few years. Perhaps most famously, Rep. Doug Ricks, R-Rexburg, unseated Ron Nate from a District 34 House seat two years ago. Nate then defeated Raybould in the May primary and will return to the Idaho House in January.

Furniss, too, left a mark on Idaho's political sphere with his antics and an all-out assault on gun owners and the Idaho Freedom Foundation. During the 2020 legislative session, Furniss went after the Idaho Second Amendment Alliance and couldn't accurately portray his position on Red Flag laws. He also picked a fight with the Idaho Freedom Foundation, and was admonished on the floor for his overheated rhetoric.

**Graf boasts a similar style, at least rhetorically. Of Nate, Graf, in a private phone call recorded a few weeks ago, suggests that Nate is part of a "far-right" network that somehow facilitates "organized crime."**

And it isn't just Nate he suggests is part of this "organized crime" network. Graf also suggests that 22 of Idaho's legislators are part of this "network." That's a serious accusation against 22 Idaho lawmakers to suggest that they are part of "organized crime."



Graf says these legislators can be identified by simply using the Idaho Freedom Index scores and starting at the top of the list and moving your way down.

That list of legislators could include Christy Zito, Sage Dixon, Vito Barbieri, Tony Wisniewski, Priscilla Giddings, Dorothy Moon, Tammy Nichols, Steven Harris, Jason Monks, Randy Armstrong, Julianne Young, Bryan Zollinger, Barbara Ehardt, Heather Scott, and others.

Graf boasts a rather low opinion of state Rep. Heather Scott, whom he dubbed a "domestic terrorist."

Scott, you might remember, is a hero of the conservative class in Idaho because she won't flinch in the face of political pressure.

The hatred from Graf doesn't end there, though. He's particularly obsessed with the Idaho Freedom Foundation Freedom Index scores, that detail which lawmakers support limited government and which don't. The scorecard, modeled after the American Conservative Union's report card, earns the name of "obedience score" from the enraged Graf.

**Graf bizarrely claims that he and his crew over at IdahoConservatives.com debunked the Freedom Index score, a false claim.**

In fact, the Idaho Freedom Foundation continues to publish the scorecard, which serves to educate lawmakers and average Idahoans alike about what's going on in the Statehouse.

In essence, Graf used much of his phone calls to bash Christensen, Scott, and Nate, and take shots at gun owners and IFF. But, curiously, he doesn't define "far-right," or explain why that's a bad thing.

Let's use the metric that Graf hates most, the Idaho Freedom Index, to examine why he is disgusted with people who score high on that report card each year. The Idaho Freedom Foundation has been running the scorecard since 2013. The organization rates more than 100 bills each year. When IFF analysts rate a bill, they ask 12 questions about it. Here is a sample of the questions:

- Does [the bill] create, expand, or enlarge any agency, board, program, function, or activity of government?
- Does [the bill] directly or indirectly create or increase any taxes, fees, or other assessments?
- Does it violate the spirit or the letter of either the United States Constitution or the Idaho Constitution?

**You can read the rest here.** 

This begs the question that Graf hasn't answered: Why does he hate and despise people who, among other things, won't increase the size of government, won't hike taxes, and won't violate the Constitution? What is so objectionable to Graf about holding tight to principles?

And keep in mind this isn't just adherence to the Idaho Freedom Foundation, as Graf so wrongly suggests. Take a few minutes to examine the Idaho Republican Party's platform, which outlines how GOP members ought to govern the state. You'll see a remarkable overlap between the GOP platform and the Index. Why shouldn't every state lawmaker score in the Index's upper echelon?

KIF won't make up stuff about Graf or pretend to know what's going through his mind. But, we wonder a few things about his hatred of principled conservatives.

- Why are principled lawmakers a problem for him?
- What's his agenda?
- Is his agenda in line with the Idaho GOP platform? If not, why not? Where does it differ?
- What, in terms of money, power, and prestige, is Graf not getting because principled conservatives won't bow to his bullying, political harassment, and intimidation?

These are useful, important questions, but our sense is that Graf won't answer them anytime soon. Take from that what you will.

In our next article, we will detail yet another very serious accusation Graf levels against Doyle Beck of Idaho Falls. Beck is a well known political activist whom Graf accuses directly of funneling hundreds of thousands of dollars illegally during the May Primary election to an unnamed individual in California who then gave the money to Young Americans for Liberty. 2

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August 1, 2023

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## Doyle Beck (Part 4)

NOVEMBER 12, 2020

GREG PRUETT





Gregory Graf, a top political mercenary and self-proclaimed FBI informant, spins a lot of tall tales in his own mind.

For example, Graf believes he has close ties with Idaho House Speaker Scott Bedke, a Republican from Oakley. Bedke says otherwise.

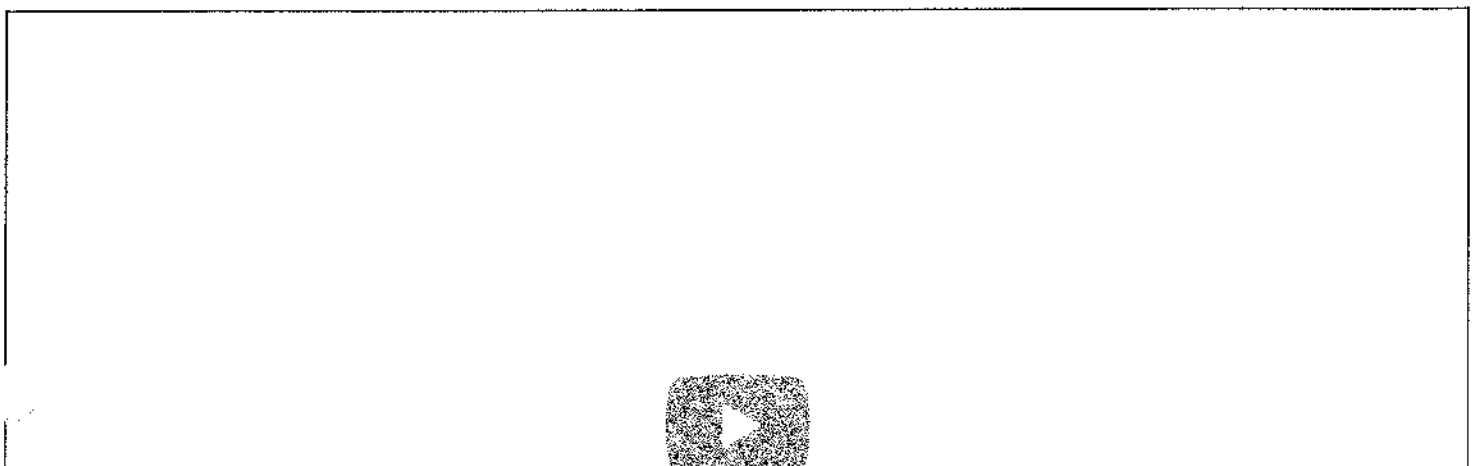
Graf also says state Rep. Chad Christensen is a sexual predator. Graf provides no evidence to back up this allegation and Christensen vigorously denies it.

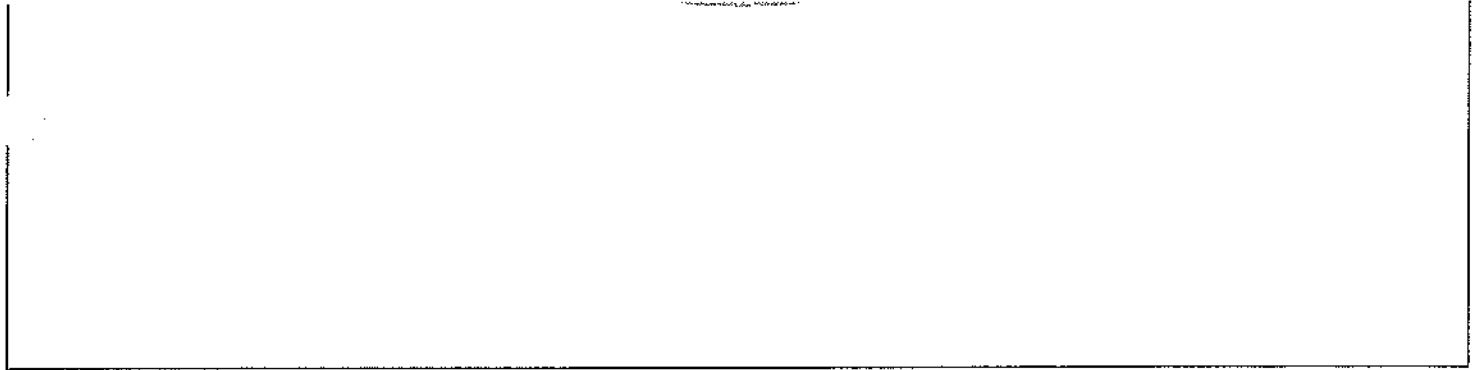
**On top of that, Graf says that more than 20 Idaho conservative lawmakers are part of a far-right network that participates in some form of "organized crime." Once again Graf provides no evidence for this serious allegation and lawmakers we have spoken to deny they have committed any crimes.**

So, it's little surprise that Graf spewed a very serious allegation against Doyle Beck, a top activist, and donor.

In a phone call with state Rep. Chad Christensen's private employer, Graf falsely claims that Beck funneled nearly \$250,000 to the owner of a tomato paste production company in California. That guy, Graf alleges, then gave the money to Young Americans for Liberty.

If it happened, that would be a felony. Here is Graf making this allegation:





The problem for Graf is that, well, it didn't. Beck never moved the money or made such a donation.

**Here's what Beck told Keep Idaho Free:** ✓

I've had nothing to do with providing money to a third party who somehow directed that money to support Chad Christensen or his campaign. I don't know what Mr. Graf is even talking about. Mr. Graf's accusation against me accuses me of a crime. This accusation against me is not only false but also defamatory per se. I am having my attorneys consider legal options for clearing my good name. ✓

So, another day, another lie for Gregory Graf, who goes to extraordinary lengths to try to punish his political enemies.

This smear by Graf is just the latest salvo in the war between Beck and Graf. A few years ago, Beck filed a lawsuit against five "John Does" trying to determine who was running IdahoConservatives.com that had the article defaming him.

At the time no one knew exactly who ran the site because everything was anonymous. Beck decided to file the lawsuit and suspected Graf was behind it all.

In a deposition, Graf had to admit that he was behind the article and the website. Afterward, Beck said that once they knew who was officially behind IdahoConservatives.com they dropped the suit without prejudice retaining their right to sue in the future.. 2

However, Graf tells Christensen's private employer that Beck lost the challenge and that he defeated Beck in court. Of course, that's not what actually happened. Here's Graf's telling of that story:



Perhaps Graf is upset with Beck because Graf believes principled conservatives are loyal to Beck and not Idaho's political establishment — of which Graf ordains himself a member.

It wasn't the first time that Graf was caught in a lie about his involvement with IdahoConservatives.com.

**One commenter named John Henager actually called out Graf on the "Idaho Conservatives" Facebook page asked Graf if it was him commenting as "Idaho Conservatives." Graf then takes a shot at himself by calling himself an "asshole."**

## Replies



**John Henager**

This you, Mr. Graff? I gave you my statement regarding that matter when you inquired prior to the forum. Mr. Ricks was not denied the opportunity to give a statement. He was provided the opportunity to speak with his constituents and take their questions and he declined to attend. Had Mr. Ricks shown up, even just to read a statement, he would have been allowed to do so as was Rep. Wendy Horman who had prior requirements preventing her from participating fully.



0w Edited Like Reply



**Idaho Conservatives**

Are you referring to Gregory Graf? We know him. He is that ASSHOLE who threatened to expose our web designer on behalf of the Labrador campaign if we did not name our editor. Sorry for our language but he is the worst.

0w Like Reply

"He is the worst." Well, at least Graf told the truth about something.

Returning to Young Americans for Liberty, Graf claims that YAL doesn't "play in primaries" meaning when there is a primary election in the state, YAL doesn't get involved. Graf claims they only get involved during the general election to support Republicans.

**Yet this lie falls apart when you learn what YAL had really done.**

YAL started getting involved in primaries in 2018 and has been involved in primaries the last two election cycles in 30 states! They have helped more than 100 candidates in the last two election cycles during the primaries.

After listening to this audio numerous times and trying to piece together all of Graf's lies, I had to wonder if there was anything in this phone call that was true. Perhaps Graf was just going all-in to toot his own horn to get Christensen fired and smear his other political opponents.

We hope that you have learned as much as we have through this four-part series on how someone with the high level of narcissism as Graf has that they will go to great lengths to destroy conservatives. Jennifer Ellis and Graf's plot to get Christensen fired through a gun-free zone shows you to what depths some in the political establishment will go to try and take someone down.

So, the next time you see yet another smear from Graf, Jennifer Ellis, Stephanie Mickelson, or anyone associated with "IdahoConservatives.com" you know it is false, desperate, and the work of people who like liberals, not conservatives.

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# Exhibit C





Greg Pruett

1h ·



**Live on KID radio in Idaho Falls talking about the Gregory Graf effort to destroy Chad Christensen.**

5

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Greg Pruetts for Idaho

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...

That's a lot of Idaho's legislators that Greasy Graf is accusing of being part of an "organized crime" network.



Keep Idaho Free

1h · 🌐

In the third part of our series exposing the shenanigans of Gregory Graf (IdahoConservatives.com) he makes serious allegations that 22 Idaho legislators are par... See More



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Revealed: Graf Accuses 22 Idaho Legislators as Part of "Organized Crime?" (Part 3) - Keep Idaho Free

👍👍 5

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Pruett  
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**In The Matter Of:**  
*CHRISTENSEN vs.*  
*GRAF, et al.*

---

*DUSTIN HURST*  
*August 02, 2023*

---

*T&T Reporting, LLC*  
*477 Shoup Avenue, Suite 105*  
*Idaho Falls, Idaho 83402*  
*(208) 529-5491*

Page 1

1 DISTRICT COURT SEVENTH JUDICIAL DISTRICT  
2 BONNEVILLE COUNTY IDAHO  
3  
4 CHAD CHRISTENSEN, )  
5 Plaintiff/Counterdefendant, ) Case No.  
6 vs. ) CV10-21-1197  
7 )  
8 GREGORY GRAF, )  
9 Defendant/Counterclaimant/  
10 Third-Party Plaintiff, )  
11 vs. )  
12 GREG PRUETT, an individual; DUSTIN  
13 HURST, an individual; and EMMALEE  
14 ROBINSON, an individual, )  
15 Third-Party Defendants. )

DEPOSITION OF DUSTIN HURST  
Wednesday, August 2, 2023, 8:57 a.m.  
Idaho Falls, Idaho

BE IT REMEMBERED that the deposition of  
Dustin Hurst was taken by the attorney for the  
defendant at the office of Beard St. Clair Gaffney,  
located at 955 Pier View Drive, Idaho Falls, Idaho,  
before Sheila T. Fish, Court Reporter and Notary  
Public, in and for the State of Idaho, in the  
above-entitled matter.

Reported by: Sheila T. Fish, CSR #906, RPR, CRR

Page 2

A P P E A R A N C E S

For the Defendant Gregory Graf:  
BEARD ST. CLAIR GAFFNEY  
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Idaho Falls, Idaho 83402  
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Allen@beardstclair.com

For the Plaintiffs:  
DINDINGER & KOHLER, PLLC  
BY: EDWARD W. DINDINGER  
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Boise, Idaho 83702  
(208) 616-5459  
Service@dklawboise.com

For the Third-Party Defendant EmmaLee Robinson:  
COOPER & LARSEN, CHARTERED  
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Pocatello, Idaho 83405  
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For the Third-Party Defendant Dustin Hurst:  
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BY: BRYAN D. SMITH  
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Post Office Box 50731  
Idaho Falls, Idaho 83405  
(208) 524-0731  
Filing@eidaholaw.com

Also Present:  
Greg Pruett  
EmmaLee Robinson

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E X A M I N A T I O N

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<a href="#">Exhibit 20</a> Dustin Hurst Tweets. Bates Nos. .. 31 DH-0022 - 0096	
<a href="#">Exhibit 21</a> Article. Bates Nos. DH-0002 - .... 38 0011	

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(The deposition proceeded at 8:57 a.m.  
as follows:)

DUSTIN HURST,

produced as a witness at the instance of the  
defendant, having been first duly sworn, was examined  
and testified as follows:

EXAMINATION

BY MR. ALLEN:

Q. All right. Good morning, Mr. Hurst.  
Let the record reflect that this is the time and  
place for the deposition of Mr. Dustin Hurst.  
Will you state your name and spell your  
last name for the reporter?

A. Yeah. Dustin Harold Hurst. H-u-r-s-t  
is the last name.

Q. Have you ever been deposed before,  
Mr. Hurst?

A. No, sir.

Q. Okay. Let me cover some ground rules  
with you then.

You and I need to be really careful  
about talking over each other. Culturally we have a  
tendency in our conversations to anticipate what

Page 5

1 somebody else is saying, anticipate what they're  
 2 asking. It makes it very difficult for her to write  
 3 down what I'm saying. So I'll try to let you finish  
 4 your answers before starting my next question. I'll  
 5 ask that you let me finish my question before you  
 6 start to answer. Try not to anticipate. Does that  
 7 sound fair?  
 8 A. Yes, sir.  
 9 Q. Okay. Great answer.  
 10 The next touchpoint is all of your  
 11 answers that are either "yes" or "no" need to be  
 12 "yes" or "no" or some other version of an actual  
 13 word, affirmative, negative, and not "uh-huh" and  
 14 "uh-uh." Again, very difficult for her to  
 15 transcribe.  
 16 A. Yes.  
 17 Q. Fair enough?  
 18 A. Yes, sir.  
 19 Q. If you need a break at any time, just  
 20 let me know. My only rule on that is I'm not going  
 21 let you take a break if I've asked a question that  
 22 you have not yet answered. So if there's a question  
 23 on the table, no break. But any time that you need a  
 24 break, 15 minutes from now, hours from now, whatever.  
 25 All right. Is there any reason that you

Page 6

1 cannot today answer my questions fully and fairly?  
 2 A. No, sir.  
 3 Q. Are you on -- under the influence of any  
 4 substance that would impair your ability to respond  
 5 accurately or -- yes. Yes. Accurately or honestly  
 6 or recall things well?  
 7 A. No, sir.  
 8 Q. Okay. Does anybody know that you're  
 9 here being deposed today besides the people in this  
 10 room and the other parties in the case?  
 11 A. Yes, sir.  
 12 Q. Who have you discussed the deposition  
 13 with?  
 14 A. My wife.  
 15 Q. Okay.  
 16 A. My kids. Chad, who is -- Chad  
 17 Christensen, who is not in the room today. My  
 18 employer, and that's it.  
 19 Q. Okay. What did you and your wife talk  
 20 about?  
 21 A. Just the generalities of the case.  
 22 Q. Okay. Like the facts of the case?  
 23 A. Just -- you know, we talked about how  
 24 I'm going to come in here and approach the whole --  
 25 the whole thing.

Page 7

1 Q. Okay. So what you're going to go  
 2 through today, basically?  
 3 A. Yes, sir.  
 4 Q. All right. What did you and your  
 5 employer talk about?  
 6 A. I told her I needed the day off for a  
 7 deposition.  
 8 Q. Okay. And who -- who specifically was  
 9 that?  
 10 A. Her name is Heather Lauer. She's the  
 11 CEO of People United for Privacy Foundation and my  
 12 supervising director.  
 13 Q. Heather Lauer?  
 14 A. Yes, sir.  
 15 Q. Can you spell that for us?  
 16 A. Yes. L-a-u-e-r.  
 17 Q. And what was the organization?  
 18 A. People United for Privacy Foundation.  
 19 Q. Okay. How long have you worked for  
 20 People United for Privacy?  
 21 A. As an employee, seven complete months.  
 22 Q. Okay. What is People United for  
 23 Privacy?  
 24 A. It's a 501(c)(3) nonprofit that does  
 25 policy, education, and advocacy.

Page 8

1 Q. Is there a particular focus?  
 2 A. Donor privacy.  
 3 Q. Donor privacy?  
 4 A. Yes, sir.  
 5 Q. Okay. What did you and Chad talk about  
 6 with respect to the deposition?  
 7 A. I -- I understand that he was deposed  
 8 yesterday, and I just wanted to know -- we talked  
 9 about what types of questions were asked and how that  
 10 went down. And we also talked about Mr. Pruet's  
 11 deposition, just general -- generalities about how it  
 12 goes. I've never been through it before and wanted  
 13 to know how it goes.  
 14 Q. Okay. Anybody else that we haven't  
 15 covered?  
 16 A. My wife -- oh, wait, we talked about  
 17 her.  
 18 Q. And your kids, whatever.  
 19 A. Yeah.  
 20 Q. Okay. Where do you currently reside?  
 21 A. Do you need full address or just a city?  
 22 Q. City is fine.  
 23 A. Boise, Idaho.  
 24 Q. And how long have you lived in Boise?  
 25 A. 12 years, I think. I don't know. But

Page 9

1 it's been a long time.  
 2 **Q. How old are you?**  
 3 A. 37.  
 4 **Q. So most of your adult life you've been**  
 5 **in Boise?**  
 6 A. Yeah.  
 7 **Q. Okay. Where did you graduate from high**  
 8 **school?**  
 9 A. Carbon High School in Price, Utah.  
 10 **Q. Did you go to college?**  
 11 A. Yes, sir.  
 12 **Q. Did you grow up in Price?**  
 13 A. I spent eight years in Price in my  
 14 youth.  
 15 **Q. Okay. Where did you go to college?**  
 16 A. I attended North Idaho College in Coeur  
 17 d'Alene for the first 2.5 years. It took me a little  
 18 longer than it should have. And then I finished my  
 19 four-year degree at Boise State University.  
 20 **Q. Did you get an associate's degree from**  
 21 **North Idaho?**  
 22 A. Yes, sir.  
 23 **Q. In what?**  
 24 A. General studies, I think.  
 25 **Q. Okay. And a degree from BSU. What**

Page 10

1 **degree was that in?**  
 2 A. Communication, with a minor in political  
 3 science.  
 4 **Q. Okay. When did you graduate from Boise**  
 5 **State?**  
 6 A. 2009, I think. It's been so long.  
 7 **Q. Did you leave Boise for a time after**  
 8 **graduation, after you moved back there?**  
 9 A. Yes, sir.  
 10 **Q. Where did you go?**  
 11 A. I went to Helena, Montana, for an  
 12 assignment for an employer.  
 13 **Q. Who was that employer?**  
 14 A. It's the Franklin Center for Government  
 15 and Public Integrity.  
 16 **Q. Has most of your career since graduation**  
 17 **from college been related to politics, government, or**  
 18 **policy?**  
 19 A. About 98 percent of it, yes.  
 20 **Q. Okay. So let's -- let's talk through**  
 21 **that. Most recently I think that you said People**  
 22 **United for Privacy?**  
 23 A. Yes, sir.  
 24 **Q. And that's been for seven months?**  
 25 A. Yes, sir.

Page 11

1 **Q. Who was your employer before that?**  
 2 A. Excuse me, Idaho Freedom Foundation and  
 3 Idaho Freedom Action.  
 4 **Q. And how long did you work for them?**  
 5 A. Oh, a good nine-ish years.  
 6 **Q. Okay. Why did you leave there?**  
 7 A. I wanted a new challenge at my current  
 8 job. Different role, different challenge.  
 9 Fundraising is not easy, and I wanted to learn.  
 10 **Q. So is that what you're doing for People**  
 11 **United for Privacy? Fundraising?**  
 12 A. Yes, sir.  
 13 **Q. What did you do for Idaho Freedom**  
 14 **Foundation?**  
 15 A. Communications and low-dollar  
 16 fundraising.  
 17 **Q. Where were you before Idaho Freedom**  
 18 **Foundation?**  
 19 A. The Franklin Center for Government and  
 20 Public Integrity.  
 21 **Q. Okay. And that was right out of**  
 22 **college?**  
 23 A. No.  
 24 **Q. Okay.**  
 25 A. So that was from 2012 to 2015-ish, I

Page 12

1 worked for those guys.  
 2 **Q. Okay. What was your position there?**  
 3 A. I started as a reporter and then took on  
 4 social media responsibilities. So I was a national  
 5 media reporter and social media specialist, if you  
 6 will.  
 7 **Q. And where did you work before Franklin**  
 8 **Center?**  
 9 A. Idaho Freedom Foundation.  
 10 **Q. Okay. So you were there, you left**  
 11 **there, and you went back there?**  
 12 A. Uh-huh.  
 13 **Q. Do you have any involvement with Idaho**  
 14 **Freedom Foundation now, nonemployee?**  
 15 A. Define "involvement," will you?  
 16 **Q. Are you still supporting the**  
 17 **organization in some formal capacity that doesn't**  
 18 **involve being an employee?**  
 19 A. I donated a small amount earlier this  
 20 year.  
 21 **Q. How long did you work for them the first**  
 22 **time around?**  
 23 A. About two and a half years.  
 24 **Q. How long have you known Mr. Christensen?**  
 25 A. I don't have a specific date. As long

Page 13

1 as he's been a candidate or involved in politics,  
 2 I've known him.  
 3 **Q. Is that how you first became familiar**  
 4 **with him?**  
 5 A. Yes, sir.  
 6 **Q. Tell me how that came about.**  
 7 A. I literally don't know. I don't know.  
 8 **Q. You don't recall how you first met him?**  
 9 A. No.  
 10 **Q. Okay. Any recollection of who first**  
 11 **introduced you?**  
 12 A. No, sir.  
 13 **Q. Okay. Were you in any way involved in**  
 14 **supporting his campaign, his first campaign?**  
 15 A. Can you define "supporting"?  
 16 **Q. Advising?**  
 17 A. No, sir.  
 18 **Q. Donating money?**  
 19 A. No, sir.  
 20 **Q. Campaigning on behalf of?**  
 21 A. Within the bounds of law.  
 22 **MR. SMITH:** I have a question about this,  
 23 Jared. Are you talking about him personally or one  
 24 of his employers?  
 25 **THE WITNESS:** That's a good question.

Page 14

1 **MR. ALLEN:** I'm asking about him personally.  
 2 **THE WITNESS:** Oh. No, sir.  
 3 **Q. BY MR. ALLEN: Okay. How about any of**  
 4 **your employers?**  
 5 A. Can I ask you a question?  
 6 **MR. SMITH:** Yeah. Can we just take a break  
 7 for a second.  
 8 **Q. BY MR. ALLEN: Yeah, I mean, it sounds**  
 9 **like the answer is "yes," but you want to clarify**  
 10 **something with Bryan?**  
 11 A. There's -- there's -- election law is  
 12 tricky, and I want to be clear about how I answer  
 13 this.  
 14 **Q. Okay. That's fair.**  
 15 A. Okay. Do you mind restating the  
 16 question, sir?  
 17 **MR. ALLEN:** I'll just restate the question.  
 18 **Q. BY MR. ALLEN: Have any of your**  
 19 **employers been involved in supporting Mr. Christensen**  
 20 **in his campaigns?**  
 21 A. Can you define "supporting"?  
 22 **Q. Funding, campaigning on behalf of,**  
 23 **advising, any of those.**  
 24 A. Thank you. No, sir.  
 25 **Q. Okay. Has Idaho Freedom Action in any**

Page 15

1 **way supported Mr. Christensen's efforts to be**  
 2 **elected?**  
 3 A. Can you define "supporting"?  
 4 **Q. Anything?**  
 5 A. No, sir.  
 6 **Q. Okay. They haven't done anything to**  
 7 **advance the cause of his elections?**  
 8 A. No, sir.  
 9 **Q. Okay. Haven't advocated on his behalf?**  
 10 A. Can you define "advocate"?  
 11 **Q. Anything?**  
 12 A. I'm sorry. These are just very specific  
 13 things that you are asking.  
 14 **Q. What role, if any, has Idaho Freedom had**  
 15 **in response to Chad Christensen's actions?**  
 16 A. None.  
 17 **Q. Have you ever personally spoken out on**  
 18 **behalf of Chad Christensen in his efforts to be**  
 19 **elected?**  
 20 A. I don't recall.  
 21 **Q. What is the Idaho Freedom PAC?**  
 22 A. That is a state PAC that is built and  
 23 funded to elect good conservative legislators and  
 24 other officials to state and public office.  
 25 **Q. Who operates that PAC?**

Page 16

1 A. I serve as the treasurer, and a  
 2 wonderful lady named Tina Deboer served as chair.  
 3 **Q. Can you spell her last name?**  
 4 A. Yes. It's D-e-b-o-e-r.  
 5 **Q. Okay. Has the Idaho Freedom PAC ever**  
 6 **supported Mr. Christensen's efforts to get elected?**  
 7 A. Yes, sir.  
 8 **Q. How about Ron Nate? Has the Idaho**  
 9 **Freedom PAC supported Ron Nate?**  
 10 A. Yes, sir.  
 11 **Q. What about Barbara Ehardt?**  
 12 A. To the best of my memory, yes, sir.  
 13 **Q. How would you describe your relationship**  
 14 **with Mr. Christensen?**  
 15 A. We're friends.  
 16 **Q. Okay. When did you first become aware**  
 17 **of Mr. Graf?**  
 18 A. I do not recall.  
 19 **Q. So you don't recall how either?**  
 20 A. Oh, I know how. I don't recall when.  
 21 **Q. How did you first become aware of**  
 22 **Mr. Graf?**  
 23 A. Mr. Graf frequently inserts himself into  
 24 political discussions about Idaho politics and  
 25 policy. So likely a Twitter post, a -- one of his



Page 17

1 many websites, maybe his podcast. Some sort of media  
 2 produced by Mr. Graf attacking me, Idaho Freedom  
 3 Foundation, Idaho Freedom Action, likely is how I  
 4 became aware of Mr. Graf.  
 5 **Q. Okay. So he's spoken out publicly**  
 6 **against you or the Idaho Freedom Foundation?**  
 7 A. And -- yeah. Yeah.  
 8 **Q. And that -- to the best of your**  
 9 **recollection, that's how you first became aware of**  
 10 **him?**  
 11 A. Yeah. That's -- yeah.  
 12 **Q. Okay. You're not suggesting that that's**  
 13 **inappropriate, are you?**  
 14 A. Oh, no. Absolutely not.  
 15 **Q. His right to speak out?**  
 16 A. I -- no.  
 17 **Q. All right. Do you recall your first**  
 18 **personal contact with Mr. Graf?**  
 19 A. Yes.  
 20 **Q. When was that?**  
 21 A. About 30 minutes ago.  
 22 **Q. All right. First direct contact, not**  
 23 **face-to-face in-person?**  
 24 A. No, sir.  
 25 **Q. You don't recall?**

Page 18

1 A. No, sir.  
 2 **Q. Have you had direct contact with him?**  
 3 A. I -- I don't know.  
 4 **Q. Have you conversed with him online at**  
 5 **all?**  
 6 A. Yes.  
 7 **Q. Okay. Do you recall the first time that**  
 8 **you conversed with him online?**  
 9 A. No, sir.  
 10 **Q. Is that just because it was too long**  
 11 **ago?**  
 12 A. Yes, sir.  
 13 **Q. And maybe too frequent?**  
 14 A. Can you define -- I guess the question  
 15 is can you define "converse"? Is that trading  
 16 tweets? Is that him texting me?  
 17 **Q. Sure. Any communication between the two**  
 18 **of you.**  
 19 A. Yeah, it's been a lot. And the first  
 20 one happened a long time ago, so I don't recall.  
 21 **Q. Okay. Pretty extensive?**  
 22 A. Yeah.  
 23 **Q. All right. Let's -- let's get into the**  
 24 **recording that is kind of the center of the subject**  
 25 **matter of this litigation.**

Page 19

1 **Do you recall how you first learned**  
 2 **about the recording?**  
 3 A. I don't.  
 4 **Q. No recollection at all?**  
 5 A. Nope.  
 6 **Q. Okay. Would you have learned about it**  
 7 **from David Lyon?**  
 8 A. No.  
 9 **Q. Okay. Would you have learned about it**  
 10 **from Mr. Christensen?**  
 11 A. It's entirely possible.  
 12 **Q. Okay. I'll represent to you that**  
 13 **Mr. Pruett testified two days ago that you called him**  
 14 **and told him about the recording.**  
 15 A. Right.  
 16 **Q. That that's how he learned about it.**  
 17 **Does that sound accurate to you?**  
 18 A. What I'll -- I'll tell you what I told  
 19 him, which is I don't remember how we came into  
 20 possession of it. But what I do know is I trust Greg  
 21 completely so -- meaning Mr. Pruett. So I trust him.  
 22 **Q. Okay. You just don't have any idea how**  
 23 **the two of you came into possession of it?**  
 24 A. No, sir.  
 25 **Q. Did you give copies to anyone?**

Page 20

1 A. Not according to my memory. It was a  
 2 Dustin and Greg Pruett project.  
 3 **Q. Okay. You didn't give a copy to Neal**  
 4 **Larsen?**  
 5 A. To who?  
 6 **Q. Neal Larsen?**  
 7 A. No.  
 8 **Q. Do you have any idea who did?**  
 9 A. I -- no.  
 10 **Q. Okay. You didn't give a copy to**  
 11 **Stephanie Lucas?**  
 12 A. No.  
 13 **Q. Do you have any idea who did?**  
 14 A. No.  
 15 **Q. Okay. Did you discuss it with anyone?**  
 16 A. Mr. Pruett.  
 17 **Q. Did you discuss it with anyone else?**  
 18 A. Not to the -- not to my memory, no.  
 19 **Q. What about Chad?**  
 20 A. At some point after the recording was  
 21 made, I'm sure that I discussed it with him.  
 22 **Q. Do you have any recollection today of**  
 23 **what you and Mr. Pruett talked about when you**  
 24 **discussed the recording?**  
 25 A. Yes. So we talked about the recording,

Page 21

1 what to do with it, what would be the best course of  
 2 action. And we decided who would author the articles  
 3 and how they would get published to Keep Idaho Free.  
 4 **Q. Do you recall what you and Chad talked**  
 5 **about with respect to the recording?**  
 6 A. No, sir.  
 7 **Q. Did you ever discuss it with EmmaLee**  
 8 **Robinson?**  
 9 A. No.  
 10 **Q. Do you know how much time passed between**  
 11 **when the recording was made and when you received it?**  
 12 A. I have no idea.  
 13 **Q. Would it surprise you to learn that it**  
 14 **was less than 24 hours?**  
 15 A. Again, I have no idea, so I can't  
 16 comment on that.  
 17 **Q. Okay. Do you recall tweeting to**  
 18 **Mr. Graf that he was about to be exposed?**  
 19 A. I probably did. But I don't recall  
 20 that.  
 21 **Q. Okay. After the recording was made,**  
 22 **Ms. Robinson had some subsequent Messenger**  
 23 **communication via Facebook Messenger with Mr. Graf.**  
 24 **Were you provided a copy of that communication?**  
 25 A. No.

Page 22

1 **Q. Okay. Do you recall having seen that**  
 2 **communication at any point in time?**  
 3 A. I -- I don't recall seeing that at all.  
 4 **MR. ALLEN:** Let's have this exhibit marked  
 5 next.  
 6 ([Exhibit 19](#) marked.)  
 7 **Q. BY MR. ALLEN: Do you recognize this?**  
 8 A. Yes, sir.  
 9 **Q. This is something that you produced in**  
 10 **discovery. And I'm not entirely clear on what is**  
 11 **what here. So this first page appears to be probably**  
 12 **some text communication. Can you confirm whether or**  
 13 **not that's correct?**  
 14 A. Yes, sir.  
 15 **Q. Okay. Who are the communicants in this**  
 16 **text communication?**  
 17 A. Are we talking about all of the pages or  
 18 just the first page?  
 19 **Q. The first page.**  
 20 A. It looks like it's between me and  
 21 Mr. Pruett.  
 22 **MR. SMITH:** Are you asking if he knows that,  
 23 or are you asking -- because it doesn't really say on  
 24 here.  
 25 **MR. ALLEN:** Yeah, I'm asking -- it's his

Page 23

1 communication. I'm asking him who it was. I mean,  
 2 if he doesn't know, I guess he can tell me that he  
 3 doesn't know, but...  
 4 **THE WITNESS:** Yeah. These are between me and  
 5 Mr. Pruett.  
 6 **Q. BY MR. ALLEN: Okay. How about page 2?**  
 7 A. I'm pretty sure it's me and Mr. Pruett.  
 8 **Q. There's a text at the bottom referring**  
 9 **to Mr. Graf or Mr. Graf says, "Notice Graf hasn't**  
 10 **done anything in forever." Is that, in fact, a**  
 11 **reference to Mr. Greg Graf?**  
 12 A. Yes, sir.  
 13 **Q. Okay. And who do you -- I'm sure it's**  
 14 **difficult to tell from this, but can you tell which**  
 15 **of you sent that text?**  
 16 A. That would be -- that would have to be  
 17 Mr. Pruett, because the -- the dark boxes are mine.  
 18 **Q. Okay. Do you have any idea what he's**  
 19 **talking about there?**  
 20 A. I really don't.  
 21 **Q. Okay. Next page. Is this still between**  
 22 **you and Mr. Pruett?**  
 23 A. Yes, sir.  
 24 **Q. So can you tell, looking at these -- and**  
 25 **these are the order that they were produced in. If**

Page 24

1 **you look at the bottom right corner and the upper**  
 2 **left corner, it says DH-0014 on page 1.**  
 3 A. Yes, sir.  
 4 **Q. And it says DH-0016 on page 3.**  
 5 **Can you tell if these are in the order**  
 6 **that they would have been sent and received?**  
 7 A. I cannot tell that, no.  
 8 **Q. Okay. Do you have any idea when the**  
 9 **texts on page 1 or page 2 would have been sent?**  
 10 A. No.  
 11 **Q. Okay. Do you and Mr. Pruett text**  
 12 **frequently?**  
 13 A. Regularly.  
 14 **Q. Define "regularly."**  
 15 A. Several times per week.  
 16 **Q. Okay. So page 3 now, it looks like**  
 17 **we've now got a date point of reference for at least**  
 18 **the tweets at the bottom, July 12th, 2022?**  
 19 A. Yes, sir.  
 20 **Q. There's a reference below that where**  
 21 **your thoughts on Graf's counter-lawsuit against**  
 22 **you -- did I read that correctly?**  
 23 A. Yes, sir.  
 24 **Q. Is that a reference to Mr. Graf's claim**  
 25 **in this case?**

Page 25

1 A. I believe so.

2 **Q. Do you know what article Mr. Pruett's**  
3 **referring to, that inquiry?**

4 A. I don't recall exactly. My -- yeah, I  
5 don't recall exactly.

6 **Q. But something he would have written in**  
7 **the summer of last year?**

8 A. Yeah. Probably.

9 **Q. Okay. Page 4, still text communication**  
10 **between you and Mr. Pruett?**

11 A. Yes, sir.

12 **Q. It looks like there's a screenshot at**  
13 **the upper right-hand side with reference to the Idaho**  
14 **State Department of Education and then your tweet --**  
15 **or your text, excuse me: "Wut?" W-u-t. Can you**  
16 **tell me what you're referring to there?**

17 A. I honestly do not know.

18 **Q. Okay. No recollection?**

19 A. No.

20 **Q. And then June 10th, we have another text**  
21 **from Mr. Pruett posing the same question that he**  
22 **poses a month later in July, with a couple of**  
23 **additional questions. Do you recall receiving this**  
24 **text?**

25 A. No.

Page 26

1 **Q. Did you -- the two of you have any**  
2 **conversation wherein -- I mean, clearly you didn't**  
3 **respond to it here, or at least if you did, you**  
4 **didn't provide those texts.**

5 **So did you have a conversation wherein**  
6 **you answered those questions?**

7 A. I don't recall.

8 **Q. Okay. Do you have any idea what article**  
9 **he was working on?**

10 A. I don't.

11 **Q. Okay. Next page. Is this still**  
12 **communication between you and Mr. Pruett?**

13 A. It is.

14 **Q. So I believe that we asked for all of**  
15 **your communications with Mr. Pruett regarding**  
16 **Mr. Graf. This is everything you provided.**

17 **Would it be fair then for me to assume**  
18 **that the two of you did not discuss Mr. Graf at all**  
19 **between January 27th -- at all via text, excuse me,**  
20 **between January 27, 2022, and June of 2022?**

21 A. I performed a keyword search during  
22 discovery for Mr. Graf's name in a few variations,  
23 and this is what I came up with. And that's what I  
24 provided to discovery, or for discovery, excuse me.

25 **Q. Okay. Can you tell me what your keyword**

Page 27

1 **search was?**

2 A. "Graf," "Gregory Graf," "Greg." Those  
3 were the three keywords that I used.

4 **Q. Okay. Let's go to the next page, JH-19.**  
5 **It looks again like there's a screenshot at the top**  
6 **from Idaho Dispatch. It looks like you sent it. But**  
7 **do you have any idea what this is a reference to?**

8 A. I have no idea.

9 **Q. You don't know what the urgent message**  
10 **was?**

11 A. I actually don't know why I sent this.  
12 So I don't know.

13 **Q. Okay. Is this still communication**  
14 **between yourself and Mr. Pruett?**

15 A. Yes.

16 **Q. And down at the bottom, it says: "Yeah,**  
17 **Twitter was being weird with that." Do you have any**  
18 **idea what that is in reference to?**

19 A. I don't.

20 **Q. It looks like at the bottom you tweeted**  
21 **or texted at some point in time: "Steph Lucas Live!**  
22 **Launches tonight." Do you know what that's in**  
23 **reference to?**

24 A. Yes.

25 **Q. What's that a reference to?**

Page 28

1 A. When in my capacity for Idaho Freedom  
2 Foundation, I worked with Steph Lucas on a video  
3 show, a weekly video show, and I wanted my friends to  
4 know about it.

5 **Q. Okay. The -- take a look at page 20.**  
6 **The top tweet here refers to Mr. Graf, the top text.**  
7 **Is there any correlation in time between**  
8 **the Steph Lucas reference and the Mr. Graf reference?**

9 A. Absolutely not.

10 **Q. Okay. Who is Clinton Daniel?**

11 A. Clinton Daniel is a friend of mine.

12 **Q. So if we're looking at page 20 now, is**  
13 **this a -- is this some kind of a group thread?**

14 A. We have -- I have a group thread with  
15 me, Mr. Pruett, and Mr. Daniel.

16 **Q. Okay. Just the three of you?**

17 A. Yes, sir.

18 **Q. What does Clinton Daniel do?**

19 A. He is a -- I don't know if it's a  
20 field -- "field agent" in the wrong term. But field  
21 officer for Congressman Russ Fulcher.

22 **Q. So is it -- if I'm looking at this**  
23 **correctly, it appears that Mr. Daniel is the one that**  
24 **texted: "Greg Pruett at Melaleuca," quote -- or**  
25 **question mark. Is that accurate?**

Page 29

1 A. Yes.

2 **Q. And then: "Yes and no, working for**

3 **Melaleuca, but also heading up non-Melaleuca**

4 **political stuff for him. And it's direct to him. It**

5 **was intriguing."**

6 **Did I read that correctly?**

7 A. Yes, sir.

8 **Q. And that's all from Clinton Daniel?**

9 A. Yes, sir.

10 **Q. And what is he referring to?**

11 A. Mr. Clinton was offered a job from

12 Mr. VanderSloot who is the -- I assume -- owner of

13 Melaleuca, to do the work that Mr. Daniel described

14 in this text.

15 **Q. What was the time frame of this**

16 **communication?**

17 A. I don't know specific dates. But it was

18 recent.

19 **Q. Recent, in the last six months?**

20 A. Yes.

21 **Q. In the last three months?**

22 A. Probably.

23 **Q. In the last month?**

24 A. Entirely possible. I can't confirm.

25 **Q. Okay. Do you know if Mr. Daniel took**

Page 30

1 **the job?**

2 A. He did not.

3 **Q. Do you know why not?**

4 A. Yes.

5 **Q. Why not?**

6 A. I don't know that I -- I'm at liberty to

7 speak for Mr. Daniel on this.

8 **Q. Well, you're at liberty to speak about**

9 **what you know.**

10 A. He wanted to stay in Lewiston, didn't

11 want to uproot his kids. Just didn't want to --

12 didn't want to move on to that opportunity.

13 **Q. Okay. All right. Last page. Can you**

14 **tell me what this is?**

15 A. Occasionally friends -- like me and

16 Mr. Pruett -- joke around with our political

17 frustrations. And as you might guess, Mr. Graf is a

18 political frustration. So when we had to submit

19 discovery, I had a little fun.

20 **Q. Okay. So this is a text communication**

21 **between you and Mr. Pruett --**

22 A. Yes, sir.

23 **Q. -- joking about the discovery process?**

24 A. Yes, sir.

25 **Q. I mean, nothing you say here about**

Page 31

1 **Mr. Graf is unusual. This is the subject that you**

2 **put on Twitter all the time, right?**

3 A. More or less.

4 **Q. So it wasn't going to be a surprise to**

5 **me to see this to me in discovery, right?**

6 A. It -- it was a moment of frustration.

7 **Q. All right.**

8 **MR. SMITH:** Are we talking about the text on

9 page 21? Is that what that is?

10 **MR. ALLEN:** We are.

11 **Q. BY MR. ALLEN: All right. Let's go on**

12 **to -- there wasn't a response there from Mr. Pruett.**

13 **Do you recall that he responded to that at all?**

14 A. No.

15 **MR. ALLEN:** Okay. Let's mark this as 20.

16 ([Exhibit 20](#) marked.)

17 **Q. BY MR. ALLEN: Do you recognize this**

18 **stack of papers?**

19 A. Never had them printed out before, but

20 yes, sir. Sorry to waste so much paper.

21 **Q. So tell me what this is.**

22 A. These are tweets about -- in reference

23 to Mr. Gregory Graf in general.

24 **Q. Tweets by you?**

25 A. Yes.

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1 **Q. Okay. And what is the time frame of**

2 **this -- because I know there are other tweets that**

3 **you have tweeted about Mr. Graf that I have seen. So**

4 **this doesn't cover everything. So what's the time**

5 **frame here?**

6 A. I did a search that started -- I did a

7 search from my timeline and went back as far as I

8 could.

9 **Q. Okay.**

10 A. That's what I know.

11 **Q. So would the first page represent the**

12 **most recent stuff, or would the last page represent**

13 **the most recent stuff? Or are they in chronological**

14 **order?**

15 A. I don't know that they are in

16 chronological order.

17 **Q. All right. Take a look at the -- let's**

18 **see. All right. Take a look at that first tweet --**

19 A. Yeah.

20 **Q. -- on page DH-0022. Do you recall**

21 **tweeting that particular tweet?**

22 A. No.

23 **Q. So you don't have any recollection of**

24 **when that would have been?**

25 A. I mean, I send a lot of tweets. I

Page 33

1 don't --

2 **Q. You do indeed.**

3 A. I don't necessarily, you know, write

4 down in my journal when I -- when I tweet. It's not

5 something I remember often.

6 **Q. Okay. So if we look down to the Brandon**

7 **Durst tweet below it, it looks like that was tweeted**

8 **on the 21st of August of 2022. Would that have been**

9 **in reply to your tweet?**

10 A. I mean, it does say replying to my --

11 **Q. It appears to be --**

12 A. It -- it appears to be, yes. Yeah.

13 **Q. All right. So that gives us at least a**

14 **time frame that it had to have been before the 24th**

15 **of August, 2022?**

16 A. Right.

17 **Q. Okay. Let's go to page DH-00 --**

18 **MR. SMITH:** Did you say 58?

19 **MR. ALLEN:** No, DH-0035.

20 **Q. BY MR. ALLEN:** The 17th of

21 **November 2022, there's a tweet there from you,**

22 **saying: "Someone tracked fake accounts he had on**

23 **Facebook at one point. This person suggested Graf**

24 **likely had at least 40 accounts."**

25 **Where did you get that information?**

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1 A. From a friend.

2 **Q. Who was the friend?**

3 A. Adam Frugoli.

4 **Q. Did Adam tell you who tracked the fake**

5 **accounts?**

6 A. He did not.

7 **Q. Did he suggest to you that it was him**

8 **that tracked the fake accounts?**

9 A. No.

10 **Q. Did he tell you anything else about**

11 **these alleged fake accounts?**

12 A. No.

13 **Q. How many accounts other than Hurst for**

14 **Idaho do you have on Twitter?**

15 A. Three -- can I check real quick?

16 **Q. Sure.**

17 A. Now, when -- I will say this: When you

18 say "have," what do you mean?

19 **Q. Currently. How many Twitter accounts do**

20 **you use to post content?**

21 A. Three.

22 **Q. Okay. What are the three?**

23 A. Hurst for Idaho, Freedom Bros Pod, and

24 Idaho Freedom PAC, although I don't know if that's

25 the actual handle. It could be IF PAC or something,

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1 but generally the Twitter handle associated with

2 Idaho Freedom PAC.

3 **Q. And Freedom Bros Pod, is that related to**

4 **the podcast you have with Mr. Pruett?**

5 A. Yes, sir.

6 **Q. Okay. How many other accounts have you**

7 **had in the last year?**

8 A. I don't know.

9 **Q. Okay.**

10 A. I -- I don't know.

11 **Q. Do you know if you have had others?**

12 A. I don't recall. This came up in

13 deposition a couple -- like, during one of these, and

14 I went back and checked my e-mail, and I can't find

15 record of any.

16 **Q. So you don't recall having any other**

17 **Twitter handles that you use to post content --**

18 A. I don't recall.

19 **Q. -- about Mr. Graf?**

20 A. No.

21 **Q. Do you recall creating a Twitter handle,**

22 **Greasy Greg Graf?**

23 A. So this is the one that came up in

24 discovery. I went back and checked my records, and I

25 could not find any record of it. And usually when

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1 you form one, Twitter sends you an e-mail.

2 **Q. Okay. Let's move on to our next**

3 **exhibit. What do we have here? Do you know how many**

4 **pages that is?**

5 A. What?

6 **MR. ALLEN:** Sorry. I started talking about

7 the exhibit and then I got to thinking about this

8 exhibit.

9 **Q. BY MR. ALLEN:** So you've got about 74

10 **pages of tweets there; does that look right to you?**

11 A. That looks about right.

12 **Q. Explain to me again how you generated**

13 **that particular document for production?**

14 A. I went back and did a search on -- for

15 keywords related to Mr. Graf or his handle. And I

16 just went through and did screenshots and uploaded

17 them to Drive and shared them with Mr. Smith's

18 office.

19 **Q. Okay. So did you use the same keywords**

20 **that you used with respect to the text messages?**

21 A. No.

22 **Q. What keywords did you use here?**

23 A. I used Mr. Graf's handle, which is, I

24 believe, @gsgraf, and then I used his last name.

25 **Q. Just those two?**

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1 A. Those are the best ones for that, yes.  
 2 **Q. Okay. And take a look at page 2 --**  
 3 **well, no, page 2 is not a good example. Sorry. What**  
 4 **I'm wondering is if this -- this whole document would**  
 5 **represent two distinct and separate search results.**  
 6 **Did you conduct two search results?**  
 7 A. I believe so, yeah.  
 8 **Q. So somewhere in the middle here is going**  
 9 **to be a break between the documents related to the**  
 10 **search for just his last name and the search for just**  
 11 **his handle?**  
 12 A. They might be mixed together.  
 13 **Q. Okay.**  
 14 A. I just wanted to get this done. I knew  
 15 that this was going to take a while. So I just --  
 16 again, just went through them and got what I could.  
 17 **Q. Yeah. And what I'm trying to figure**  
 18 **out -- because I know there are tweets that are not**  
 19 **in here --**  
 20 A. Right.  
 21 **Q. -- that relate to Mr. Graf. So I'm**  
 22 **trying to figure out how they were left out. I guess**  
 23 **that's not something you can answer.**  
 24 **Would you agree that there are**  
 25 **additional tweets, that you didn't capture all of**

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1 **them?**  
 2 A. Probably, yes.  
 3 **MR. ALLEN:** All right. Let's move on to 21.  
 4 ([Exhibit 21](#) marked.)  
 5 **Q. BY MR. ALLEN:** All right. Tell me what  
 6 **this exhibit is.**  
 7 A. I believe -- at least the first page is  
 8 one of the articles that Mr. Pruett and I authored  
 9 about Mr. Graf.  
 10 **Q. Take a look through the whole document.**  
 11 A. Okay.  
 12 **Q. Okay. So explain to me from your point**  
 13 **of view what this represents.**  
 14 A. These are the articles that Mr. Pruett  
 15 and I authored about Mr. Graf.  
 16 **Q. Where did this specific version come**  
 17 **from for you to produce it to us?**  
 18 A. There was a Google Docs that Mr. Pruett  
 19 and I used to edit or to -- to write and to produce  
 20 the articles.  
 21 **Q. Okay. So this came from Google Docs?**  
 22 A. Yes, sir.  
 23 **Q. All right. So was this a single Google**  
 24 **Docs files, or were there multiple Google Docs files?**  
 25 A. There were four Google Docs files.

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1 **Q. Can you, looking at this, tell me where**  
 2 **the breaks are in the Google Docs files? It came to**  
 3 **me like this. I don't have any idea what's what.**  
 4 A. So pages 002 -- or can I just say "2"?  
 5 **Q. Sure.**  
 6 A. So pages 2 through 4 are one article.  
 7 Pages 5 through 8, another article.  
 8 **Q. Is that article 2? Do you know?**  
 9 A. I don't know the order of them. They're  
 10 just -- yeah. Pages 9 through 11 are another  
 11 article.  
 12 **Q. Okay. So that gives me three. There**  
 13 **were four articles. Do you know where the rest is?**  
 14 A. That's -- this is what I found in my  
 15 Google Drive when I did the search.  
 16 **Q. All right. Tell me how you searched for**  
 17 **that.**  
 18 A. I searched Graf's name and -- again, the  
 19 variations, "Gregory Graf," "Graf," "Greg Graf."  
 20 **Q. Okay. So if I understand your testimony**  
 21 **correctly, this document or this set of documents**  
 22 **represents a collaborative effort made by you and**  
 23 **Mr. Pruett to generate the articles?**  
 24 A. Correct.  
 25 **Q. And to the extent the documents that**

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1 **were actually published on Keep Idaho Free differ**  
 2 **from these, would that have been Mr. Pruett's work?**  
 3 A. They shouldn't differ. These are the  
 4 final drafts.  
 5 **Q. Well, I've only got three here, so we**  
 6 **know that they differ to some degree --**  
 7 A. Right.  
 8 **Q. -- unequivocally, but I think that**  
 9 **there's some substantive variations in terms of the**  
 10 **actual content as well.**  
 11 A. Right. So these are -- these are the  
 12 files that I have that were asked for in discovery.  
 13 So I can't speak to what Mr. Pruett did. These are  
 14 the files that we worked on together.  
 15 **Q. Okay. But in terms of putting it up on**  
 16 **Keep Idaho Free, that was all his work. You weren't**  
 17 **involved in the actual process of taking the content**  
 18 **from a Google Doc to a web page?**  
 19 A. No, sir.  
 20 **Q. Okay. All right. Let me have you turn**  
 21 **to page -- so it's 0003, the second page of the**  
 22 **exhibit.**  
 23 A. Yes, sir.  
 24 **Q. Third paragraph down, you write: "No,**  
 25 **Graf claims close ties to several of Idaho's**

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1 political leaders, including House Speaker Scott  
 2 Bedke and Governor Brad Little."  
 3 Did I read that correctly?  
 4 A. Yes, sir.  
 5 Q. That isn't what Mr. Graf actually  
 6 claimed, is it?  
 7 A. I don't recall what was in the audio  
 8 that made that claim.  
 9 Q. He never said that he personally had a  
 10 relationship with Mr. Bedke or Mr. Little, did he?  
 11 A. I didn't --  
 12 MR. SMITH: Objection. Argumentative. He  
 13 said he didn't know what was in there.  
 14 Q. BY MR. ALLEN: You can answer.  
 15 A. I don't remember what was in the audio.  
 16 Q. Okay. But the audio will speak for  
 17 itself, correct?  
 18 A. I can't say.  
 19 Q. Let's take a look at -- let's go to just  
 20 the next page, 4, third paragraph from the bottom:  
 21 "From the audio, Graf indicates that he helped write  
 22 an article titled 'The Foundation of Fear,' which was  
 23 released on April 24th, 2019. The article has the  
 24 author name of Jennifer Ellis as the author, but the  
 25 audio we obtained indicates Graf had at least some

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1 part in putting the article together."  
 2 Did I read that correctly?  
 3 A. Yes, sir.  
 4 Q. What's the point of that paragraph?  
 5 A. I don't know.  
 6 Q. Well, you wrote it. What were you  
 7 trying to say?  
 8 A. I mean, isn't it pretty clear that --  
 9 suggesting that Mr. Graf has some sort of involvement  
 10 in writing an article about -- called "The Foundation  
 11 of Fear."  
 12 Q. So are you trying to criticize Mr. Graf  
 13 for participating in that article and not putting his  
 14 name on it?  
 15 A. No.  
 16 Q. Why didn't you put your name on this  
 17 article?  
 18 A. It was Mr. Pruet's website, and I  
 19 wanted to help Greg -- Mr. Pruet. Not Graf.  
 20 Q. And based on Mr. Pruet's testimony,  
 21 it's almost entirely your authorship. And I think  
 22 that's your discovery response as well --  
 23 A. Correct.  
 24 Q. -- correct?  
 25 A. Uh-huh.

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1 Q. Let's go to the next page. Third  
 2 paragraph: "Graf also says State Rep. Chad  
 3 Christensen is a sexual predator. Graf provides no  
 4 evidence to back up this allegation, and Christensen  
 5 vigorously denies it."  
 6 When did Christensen vigorously deny it?  
 7 A. I don't recall.  
 8 Q. Do you recall that he told you that he  
 9 denied that?  
 10 A. This was years ago. I don't recall.  
 11 Q. Okay. You wrote it?  
 12 A. Uh-huh.  
 13 Q. Can I safely assume that he, in fact,  
 14 said it?  
 15 A. I don't recall.  
 16 Q. So you might have just made that up?  
 17 A. Oh, no. Definitely not. I -- what I'm  
 18 saying is I don't know how I came into that fact of  
 19 this article.  
 20 Q. Okay. Did you do anything to try to  
 21 confirm whether or not Mr. Christensen had tendencies  
 22 of a sexual predator?  
 23 A. No.  
 24 Q. You didn't ask him about it?  
 25 A. I don't recall.

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1 Q. You don't recall?  
 2 A. Again, this was years ago. I don't  
 3 remember exactly the research and -- and prep work  
 4 that I did for this article.  
 5 Q. Were you aware at the time you wrote the  
 6 article that part of the basis for the recording that  
 7 was made was Ms. Robinson's representations that  
 8 others had suggested to her that Mr. Christensen  
 9 might be a womanizer?  
 10 A. I was not aware of that.  
 11 Q. Had no idea?  
 12 A. No.  
 13 Q. Okay. Were you aware that  
 14 Mr. Christensen has had enough sexual partners that  
 15 he can't even remember the names of some of them?  
 16 A. I'm not familiar with Chad Christensen's  
 17 sexual history.  
 18 Q. Okay.  
 19 A. So I'm sorry.  
 20 Q. All right.  
 21 A. It's just not something that I want to  
 22 be involved with.  
 23 Q. Let's go to the next paragraph: "On top  
 24 of that, Graf says that more than 20 Idaho  
 25 conservative lawmakers are part of a far-right

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1 network that participates in some form of organized  
 2 crime."  
 3 Did I read that correctly?  
 4 A. Yes, sir.  
 5 Q. It's true, is it not, that when Mr. Graf  
 6 was speaking in the recording, he actually  
 7 specifically referenced campaign finance violations  
 8 as the crimes that he was referring to, correct?  
 9 A. I don't recall what's in the audio.  
 10 Q. You don't recall?  
 11 A. I haven't listened to the audio in  
 12 years.  
 13 Q. It's fair to say that multiple people  
 14 who are affiliated with Mr. Christensen in some  
 15 capacity have, in fact, been involved with campaign  
 16 finance violations, correct?  
 17 A. I don't know.  
 18 Q. Including yourself?  
 19 A. I don't know.  
 20 Q. You don't know if you've been implicated  
 21 in campaign finance violations?  
 22 A. I do know that, yes.  
 23 Q. Right. Right. Okay.  
 24 I've got a quote here from Doyle Beck,  
 25 page 5 still. Do you see that there?

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1 A. Yes, sir.  
 2 Q. Do you have any recollection of how you  
 3 obtained that quote?  
 4 A. No.  
 5 MR. ALLEN: Okay. Let's take a quick break.  
 6 (A recess was taken from 10:01 a.m. to  
 7 10:07 a.m.)  
 8 Q. BY MR. ALLEN: Referring back to that  
 9 last exhibit, you've got the quote there from  
 10 Mr. Beck?  
 11 A. Yes.  
 12 Q. And you don't recall how you got that  
 13 quote?  
 14 A. I don't.  
 15 Q. Would you have had written communication  
 16 with Mr. Beck about the article?  
 17 A. No.  
 18 Q. And you don't recall whether it was you  
 19 or Mr. Pruett that obtained that quote?  
 20 A. I don't. It could have been either of  
 21 us.  
 22 Q. Okay. How many hours do you suppose  
 23 you've spent working on the articles?  
 24 A. Probably less than ten. It's not --  
 25 these aren't super-long articles.

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1 Q. And Mr. Pruett said probably more than a  
 2 dozen but less than 20. So we're talking somewhere  
 3 between 20 and 30 hours of --  
 4 A. Yeah, that sounds about right.  
 5 Q. And then I've got a stack of almost 80  
 6 pages of tweets that you've tweeted out about  
 7 Mr. Graf?  
 8 A. Yes, sir.  
 9 Q. And that's an incomplete stack?  
 10 A. Yes, sir.  
 11 Q. So here's my question: What is it about  
 12 Mr. Graf that you're so afraid of?  
 13 A. I'm not answering that. I'm not  
 14 answering that.  
 15 MR. SMITH: I'm going to object as to form,  
 16 that -- because it implies he's afraid of Mr. Graf,  
 17 which hasn't been established.  
 18 Q. BY MR. ALLEN: You've dumped untold  
 19 hours, time, and effort into demeaning and  
 20 discrediting Mr. Graf, somebody who your counsel  
 21 defined two days ago as, quote/unquote, nobody. So  
 22 what is it that you're concerned about?  
 23 MR. SMITH: I object also. That  
 24 misrepresents. I said in reality he's nobody. I  
 25 didn't call him nobody.

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1 MR. ALLEN: You said, "Isn't that true,  
 2 Mr. Graf, you're a nobody?"  
 3 MR. SMITH: I asked him if that's true.  
 4 MR. ALLEN: Yes.  
 5 MR. SMITH: And in my opinion, he is a  
 6 nobody. But you're now asking questions that assume  
 7 facts not in evidence. And those are -- those are  
 8 objectionable.  
 9 MR. ALLEN: You can answer.  
 10 THE WITNESS: I'm going to follow  
 11 my attorney's --  
 12 MR. SMITH: You can answer the question the  
 13 best you can. Maybe we can -- maybe we can read it  
 14 back so we can hear what the last question is.  
 15 THE WITNESS: No, that's --  
 16 MR. SMITH: I'm not sure, because I'm not  
 17 sure what the pending question is at this point.  
 18 (Requested portion of record read.)  
 19 THE WITNESS: That's the one I'm not  
 20 answering. I think there was another question after  
 21 that, where you -- the attorney rephrased.  
 22 MR. SMITH: You can answer his question. I  
 23 just posed an objection that assumes the fact that  
 24 you're afraid of him.  
 25 THE COURT REPORTER: There is another



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1 question, actually.  
 2 (Requested portion of record read.)  
 3 **MR. SMITH:** And I object as to the form.  
 4 You can answer that the best you can, if  
 5 you want to.  
 6 **THE WITNESS:** Okay. Sure. Sure. I think it  
 7 is my personal opinion that Mr. Graf is dishonest,  
 8 that he has spent more untold hours attacking me,  
 9 attacking my organizations, attacking my friends,  
 10 with dishonest tweets. And I just -- I'm not a fan  
 11 of that. That's it.  
 12 **Q. BY MR. ALLEN: You're not a fan of it,**  
 13 **but you're willing to engage in it?**  
 14 A. Sometimes you've got to get your hands  
 15 dirty to -- to make sure that the truth is out there.  
 16 **Q. Okay. But it's not just you. It's**  
 17 **not -- I mean, various individuals that have been**  
 18 **supported by your PAC have also gone to efforts to**  
 19 **silence Mr. Graf, correct?**  
 20 A. I can't speak to that.  
 21 **Q. I mean, Ron Nate contacted Melaleuca,**  
 22 **Barbara Ehardt contacted Melaleuca, trying to shut**  
 23 **him down.**  
 24 A. I can't speak to that.  
 25 **Q. Okay. Were you aware that Ms. Robinson**

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1 **leaked the recording to her personal relationship at**  
 2 **the office of general counsel at Melaleuca?**  
 3 A. I don't know who that is, and I don't  
 4 know what she did with it.  
 5 **Q. Would you agree that a lot of effort has**  
 6 **gone into trying to shut Mr. Graf down?**  
 7 A. I don't know what "a lot of effort"  
 8 means. What I do know is that Mr. Graf has made it  
 9 his life's mission to, in my opinion, attack good  
 10 conservative people and generally good people. And  
 11 it should be no surprise when they fight back.  
 12 **Q. Okay. So I've had the chance to visit**  
 13 **with Ms. Robinson, Mr. Pruett, Mr. Christensen, and**  
 14 **yourself now.**  
 15 A. Uh-huh.  
 16 **Q. I'll try to summarize the history of**  
 17 **this article as best I can, based on what each of you**  
 18 **has told me. And you tell me where you think I'm**  
 19 **incorrect.**  
 20 **Ms. Robinson contacted Mr. Graf via**  
 21 **Facebook to ask him about Chad, correct?**  
 22 A. I don't know.  
 23 **Q. You don't have any idea?**  
 24 A. No clue.  
 25 **Q. So to the extent that her testimony**

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1 **reflects that or the documents reflect that, you**  
 2 **don't have any basis for disputing that?**  
 3 A. I am not aware of that at all --  
 4 **Q. Okay.**  
 5 A. -- so I can't speak to that.  
 6 **Q. Are you aware then that Mr. Graf**  
 7 **declined to have a conversation with her about Chad**  
 8 **in a public forum and asked to move it to a private**  
 9 **forum?**  
 10 A. I am not aware of that.  
 11 **Q. So to the extent that the record**  
 12 **reflects that, you have no basis for disputing that?**  
 13 A. I can't speak to that.  
 14 **Q. Okay. And then she spoke with Mr. Graf**  
 15 **via Messenger, asking for his discretion, his**  
 16 **confidence, while simultaneously planning to record a**  
 17 **conversation with him that she would have by phone?**  
 18 **MR. OBORN:** And I'm going to object to form.  
 19 It misstates the record and the facts.  
 20 **MR. ALLEN:** The record and the facts will  
 21 speak for themselves. I think it's pretty clearly  
 22 established by the testimony.  
 23 **MR. OBORN:** I -- I am going to raise an  
 24 objection to that too. You're commenting on the  
 25 evidence.

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1 **MR. ALLEN:** As were you.  
 2 **MR. OBORN:** I was raising an objection, which  
 3 I'm entitled to do.  
 4 **MR. SMITH:** Are you asking if my client has  
 5 known about that?  
 6 **Q. BY MR. ALLEN: I'm asking if you know**  
 7 **anything about that.**  
 8 A. I can't speak to that. I don't know.  
 9 **Q. So to the extent the record reflects**  
 10 **that, you don't have any basis for that?**  
 11 **MR. OBORN:** Same objection.  
 12 **THE WITNESS:** I can't speak to the record. I  
 13 was not here during deposition, and I was not aware  
 14 that that had happened.  
 15 **Q. BY MR. ALLEN: Okay. Were you aware**  
 16 **that Ms. Robinson went to Mr. Christensen and asked**  
 17 **for his help in recording the call?**  
 18 A. No.  
 19 **Q. So to the extent that the record**  
 20 **reflects that, you have no basis for disputing that?**  
 21 A. I can't speak to that. I don't know how  
 22 the call was recorded or how they -- how others may  
 23 or may not have decided or set up technology to  
 24 record the call. Quite frankly, I don't even know  
 25 how to record a call on my phone.

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1 Q. Were you aware that when she asked or  
 2 when she told Mr. Christensen that she was going to  
 3 record the call, he said, "Please do"?  
 4 A. I can't speak to that.  
 5 Q. So, again, another fact you can't  
 6 dispute?  
 7 A. I -- it's not that I can't dispute it.  
 8 It's that I cannot speak to it because I'm not aware  
 9 of that knowledge.  
 10 Q. Well, if you can't speak to it, you  
 11 can't dispute it.  
 12 A. I want to be -- I want to be clear about  
 13 the answers, yeah.  
 14 Q. Are you aware that after she had the  
 15 conversation with Greg and recorded it, Greg Graf,  
 16 she turned it over to Chad?  
 17 A. I don't know how those two dealt with  
 18 the data. I can't speak to that.  
 19 Q. So, again, that's one that you don't  
 20 have any knowledge about?  
 21 A. No clue.  
 22 Q. Okay. Were you aware that Chad gave it  
 23 to David Lyon?  
 24 A. No.  
 25 Q. And you don't know how you got it?

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1 A. I don't recall. I -- others have their  
 2 recollection of events. But I honestly have searched  
 3 my memory. I have no idea how I came into possession  
 4 of the call or -- or how I came into possession of  
 5 the knowledge that this happened.  
 6 Q. Do you have any evidence at all that  
 7 would suggest that it was not in your possession  
 8 within 24 hours of when it was created?  
 9 A. I do not know the timeline. I didn't  
 10 track it. I have no idea how it happened.  
 11 Q. So that's a "no"?  
 12 A. Or -- yeah, I don't know the time.  
 13 Q. Were you aware that Ms. Robinson had a  
 14 phone conversation with Mr. Pruett wherein she asked  
 15 him to leave specific names out of the articles?  
 16 A. Vaguely, yes.  
 17 Q. Okay. So you don't dispute that that  
 18 happened?  
 19 A. I'm -- I'm vaguely aware of it. That's  
 20 all I can say.  
 21 Q. Okay.  
 22 A. I'm sorry. I'm trying to search my  
 23 memory and make sure that I get the best answers.  
 24 Q. And as I understand it, at least one of  
 25 the two of you had a conversation with

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1 Mr. Christensen about the articles so that he could  
 2 provide his, quote/unquote, vigorous denial?  
 3 A. That had to have happened, yes.  
 4 Q. Okay.  
 5 A. But I don't recall. Again, this was  
 6 years ago.  
 7 Q. Okay. And then you authored the vast  
 8 majority of the content?  
 9 A. Yes.  
 10 Q. And then Mr. Pruett published it to Keep  
 11 Idaho Free?  
 12 A. Yes.  
 13 Q. And then several of you went out and  
 14 actively promoted those articles via social media?  
 15 A. Yeah.  
 16 Q. Including yourself?  
 17 A. Uh-huh.  
 18 Q. Mr. Pruett?  
 19 A. Yes, sir.  
 20 Q. Mr. Christensen?  
 21 A. Can't speak to that.  
 22 Q. You didn't see any of his tweets  
 23 promoting --  
 24 A. I may have. I don't recall.  
 25 Q. Or, excuse me, Facebook posts?

Page 56

1 A. I may have. I don't recall.  
 2 Q. And Doyle Beck?  
 3 A. Again, I -- I don't even know if I'm  
 4 friends with him on Facebook, so I don't know.  
 5 MR. ALLEN: Okay. That's all I've got.  
 6 MR. SMITH: Okay. I have no questions.  
 7 MR. OBORN: I can go first.  
 8 EXAMINATION  
 9 BY MR. OBORN:  
 10 Q. Mr. Hurst, did you know that  
 11 Ms. Robinson was going to make a recording of the  
 12 phone call with Mr. Graf before the recording was  
 13 made?  
 14 A. No.  
 15 Q. Did you ask her to make a recording of  
 16 Mr. -- a conversation with Mr. Graf?  
 17 A. No.  
 18 Q. When you -- other than the recording  
 19 itself, did -- did Ms. Robinson have any input or  
 20 editorial control over the content of the articles  
 21 that were published?  
 22 A. No.  
 23 MR. OBORN: No further questions.  
 24  
 25

Page 57

1           **MR. PRUETT:** Should I go next?  
2                           **EXAMINATION**  
3 **BY MR. PRUETT:**  
4           **Q.** All right. Mr. Hurst, if you wouldn't  
5 mind calling me "Mr. Pruett" so we can delineate  
6 between --  
7           **MR. ALLEN:** For the record, I want to get my  
8 objection on the record of Mr. Pruett's participation  
9 as an advocate. He's represented by counsel.  
10           **MR. PRUETT:** Sure.  
11           **MR. ALLEN:** So it's on the record.  
12           **MR. PRUETT:** Yeah.  
13           **Q. BY MR. PRUETT:** The -- to your  
14 knowledge, the vast -- to your knowledge, when you  
15 and I are communicating, are we communicating mostly  
16 in a group setting with Clinton Daniel?  
17           A. What -- can you restate that question  
18 one more time.  
19           **Q.** Most of the time when we are texting  
20 back and forth, are we doing it in a group setting  
21 with Clinton Daniel?  
22           A. Yes.  
23           **Q.** Page 4 of Exhibit 18?  
24           A. 19?  
25           **Q.** 18. Whatever the first one was. I

Page 58

1 think it was 18.  
2           A. 19.  
3           **Q.** Was it 19? I'm sorry.  
4                           Do you recall the what questions for  
5 this particular article were when I was the editor  
6 for the Idaho Dispatch, and I was thinking about  
7 writing an article regarding this current lawsuit?  
8           A. That seems right. But, again, I don't  
9 recall exactly what came of these -- these questions.  
10 But I do know you were the editor of Idaho Dispatch  
11 at this time.  
12           **Q.** Okay. You mentioned earlier that we  
13 speak several times a week. How often do you believe  
14 that we speak about Greg Graf?  
15           A. Rarely.  
16           **Q.** Okay.  
17           A. It's not my favorite topic.  
18           **Q.** And my last one is -- is most of the  
19 time, are our conversations on Signal -- sorry, I  
20 left that --  
21           A. That was the question?  
22           **Q.** That was the -- I didn't do a very good  
23 job there.  
24           A. Nice work. Yes.  
25           **MR. PRUETT:** Okay. I think that's all I

Page 59

1 have.  
2                           **EXAMINATION**  
3 **BY MR. DINDINGER:**  
4           **Q.** Dustin, to the best of your  
5 recollection, did you ever have an agreement with  
6 Mr. Christensen to attempt to injure Mr. Graf's  
7 employment?  
8           A. No.  
9           **Q.** Did you ever have an agreement with  
10 Mr. Christensen to obtain any of Mr. Graf's property?  
11           A. I -- he has a nice race car, but I don't  
12 want it. So, no.  
13           **Q.** Okay. Did you and Mr. Christensen have  
14 any agreement to attempt to injure Mr. Graf in any  
15 way?  
16           A. No.  
17           **Q.** Okay. Did Mr. Christensen participate  
18 in the authorship of the articles?  
19           A. No.  
20           **Q.** Did Mr. Christensen exercise any form of  
21 editorial control over those articles?  
22           A. No.  
23           **Q.** Did you ask Mr. Christensen's permission  
24 before you wrote the articles?  
25           A. No.

Page 60

1           **Q.** Did you ask Mr. Christensen's permission  
2 to use the audio snippets that were included in the  
3 articles?  
4           A. No.  
5           **MR. DINDINGER:** I think those are all of the  
6 questions I have. Thank you.  
7           **MR. ALLEN:** No follow-up.  
8           **THE COURT REPORTER:** I just need to know if  
9 we're doing the same orders.  
10           **MR. ALLEN:** Yep.  
11           **MR. DINDINGER:** Just electronic with exhibits  
12 for me, please.  
13           **MR. OBORN:** Same for me.  
14           **THE COURT REPORTER:** Are you not ordering?  
15           **MR. SMITH:** No order. Read and sign.  
16           (The deposition concluded at 10:23 a.m.)  
17  
18  
19  
20  
21  
22  
23  
24  
25



DH-0022

2:58



← Tweet



**Dustin Hurst**  
@HurstforIdaho

Man. Abortion will be mostly illegal in Idaho tomorrow. What a blessing.

Wanna kill precious babies? Do it elsewhere!

Who will cry the most?

Jane

Emily

Brian Holmes

Graf

Geoff Schroeder

Or

Morgan Romero

6:36 PM · 24 Aug 22

View Tweet activity

2 Retweets 1 Quote 13 Likes



**Branden Durst, MPA, EdS** · 24 Aug 22

Replying to @HurstforIdaho

You forgot about all the pro-abortion "journalists".



DH-0023

2:58

🔍 📧 📧 📧

← Tweet



Dustin Hurst  
@HurstforIdaho

Not even the right receipt, Greasy Graf.  
Wow.

9:43

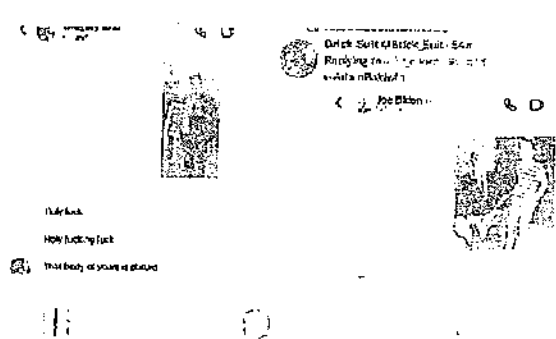
🔍 📧 📧 📧

← Tweet



Gregory Graf  
@gsgraf

Josh Gibbons, Dustin Hurst,  
and Brian Lenney all shared  
this homophobic image posted  
by Davy Reilly (yes he actually  
calls himself Davy Crockett and  
MAGAmans online). Gibbons even  
tried suggesting it was a real  
image. Here is proof they lied.  
#ipdol #receptps



DH-0024

2:58

News

← Tweet



Dustin Hurst  
@HurstforIdaho

That was easy. #ideology

Sorry Graf.



@HurstTruth

**Account suspended**

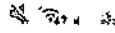
Twitter suspends accounts that violate the  
Twitter Rules. [Learn more](#)



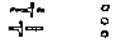
Exhibit D

DH-0025

2:58



from:@HurstforIdaho graf



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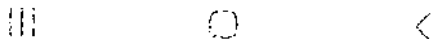
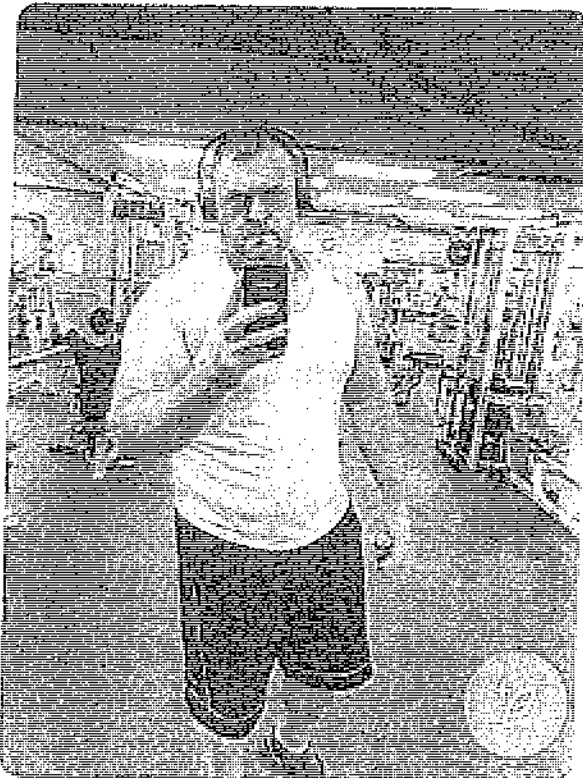


Dustin Hurst @HurstforIda... · 29 Sep 22  
For the lefties:

A lot of you have been concerned about my weight. I hear you! I'm in the gym. No need to worry.

Oh...and graf.....

(I should probably get the tanning option for an extra \$5 a month)



DH-0025



Exhibit D

DH-0026

2:59

🔍 📷 🗨

← from:@HurstforIdaho graf

🔍 📷 🗨

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🗨 7 ↻ 1 ❤️ 6 📷 🗨



**Dustin Hurst** @HurstforIdaho · 23 Sep 22  
Why is Graf obsessed with conservative men? Anyone?

🗨 4 ↻ 1 ❤️ 2 📷 🗨



**Dustin Hurst** @HurstforIda... · 09 Nov 22  
My guy @gsgraf did everything he could to put pro-abortion Arkoosh in office. He failed miserably.

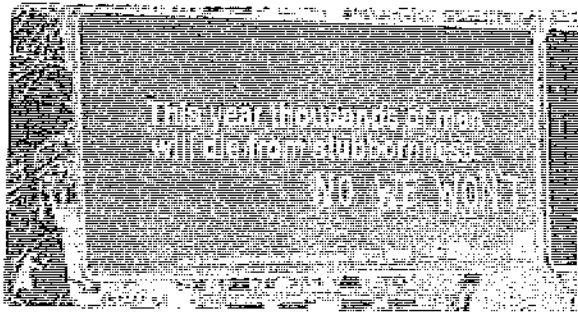
Again.

**Graf** is a loser and always will be.

🗨 3 ↻ 6 ❤️ 14 📷 🗨



**GeekyBase** . @Geeky\_Base  
Everyone knows that what can go wrong, will go wrong - we just didn't know it would go wrong quite like this.



[geekybase.com](http://geekybase.com)

Images That Prove the Universe Has a

📷 🗨 🗨

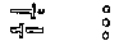
Exhibit D

DH-0027

2:59



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 17 Nov 22

**Graf** out here with yet another parody account of me? That's 5 now, I think?

Dude is obsessed.



**Dustin Hurst** @HurstforIda... · 04 Oct 22

It very much appears like **Greg Graf** will be voting for a Democrat for AG.

Amazing.

**Graf** will likely be supporting a pro-abortion Democrat this fall.

So sad to see.



**Dustin Hurst** @HurstforIda... · 22 Sep 22

**Graf** and the dumb socialist want IFF's attention. They are practically begging for it.

They want us to elevate them. Pathetic.

We dont punch down.



**Dustin Hurst** @HurstforIdaho · 23 Sep 22

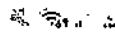
I wonder if **Graf** and Brock smoke weed



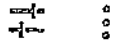
Exhibit D

DH-0028

2:59



← from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 23 Sep 22

I wonder if Graf and Brock smoke weed together. There's no other explanation for this.

This quoted Tweet is unavailable.

5 2 9



Predictagram @Predictagram\_

Our top predictors correctly predicted the \$SPY market bottom on Friday.

Click the link to follow their moves and you won't miss out next time



predictagram.com  
Predictagram

16 10 122 1.3M

Promoted



Dustin Hurst @HurstforIdaho · 18 Nov

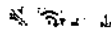
Is Graf suing me because we exposed him and he got his feels hurt?

11 0 <

Exhibit D

DH-0029

2:59



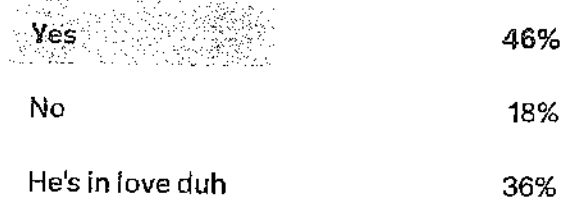
← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 18 Nov 22  
Is Graf suing me because we exposed him and he got his feels hurt?



39 votes · Final results



**Dustin Hurst** @HurstforIda... · 25 Sep 22  
I offered to box Greasy Graf, sell tickets, and donate proceeds to charity. Sad he didn't take me up on it.

Offer is still open.



**Dustin Hurst** @HurstforIdaho · 17 Nov 22  
In case it's not clear, this is not me.

It's likely Graf, who is absolutely obsessed with me.

This quoted Tweet is unavailable.



Dustin Hurst @HurstforIda... 02 Aug 22

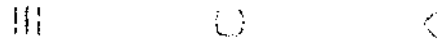


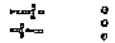
Exhibit D

DH-0030

2:59



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIda... · 02 Aug 22  
Jane, Emily, Mike, graf, & socialist think they have the numbers to change anything in Idaho.

How cute.

Meanwhile, conservatives are about to elect Dan Foreman, Scott Herndon, Glenneda Zuiderveld, Tammy Nichols, Brian Lenney, & others.

This will be an epic tantrum. #idleg



Dustin Hurst @HurstforIdaho · 07 Oct 22  
Idaho's top campaign guy just savagely destroyed Graf.

You.  
Love.  
To  
See.  
It.

This quoted Tweet is unavailable.



Dustin Hurst @HurstforIda... · 08 D  
He tweets just like Graf. Not shocking



Exhibit D

DH-0031

2:59



← from:@HurstforIdaho graf



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Dustin Hurst @HurstforIda... · 08 Dec 22  
He tweets just like Graf. Not shocking.

#likely

**RNC Research** @RNC... · 08 Dec 22

NEWLY UNEARTHED tweets from  
Election Denier Hakeem Jeffries.

Hakeem Jeffries @RepJeffries  
The real hoax is likely your so-called election victory #Rustianhacking

Donald Trump @realDonaldTrump · Dec 22, 2021  
The Alaska Pipeline controversy, like the 450,000 jobs lost, were the result of a well-planned and executed, media campaign in favor of Democrat #Hoax

6:20 AM · Dec 22, 2021

Hakeem Jeffries @RepJeffries  
45's Election Integrity Commission is the real FRAUD. They should investigate his so-called victory

5:08 PM · Dec 22, 2021

Hakeem Jeffries @RepJeffries  
CIA concludes Russia released stolen docs to hurt HRC & help Trump. Apparently it pays to play footsie with Putin #Biggas

5:05 PM · Dec 20, 2021

Hakeem Jeffries @RepJeffries  
Climate Change is NOT a hoax. But 45's election may have been #Rustianhacking #Collusion #FollowTheFacts

4:22 AM · Dec 2, 2021



Dustin Hurst @HurstforIdaho · 13 Oct 22  
Notorious crybully.

That is Graf.

@stevivoiceover @s... · 13 Oct 22

Taylor Lorenz, The One Woman Wrecking Crew...

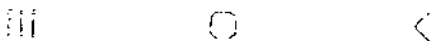


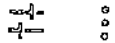
Exhibit D

DH-0032

2:59



from:@HurstforIdaho graf



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You Retweeted



Dustin Hurst @HurstforIda... · 08 Nov 22

Hearing that someone who sounds like @gsgraf is calling the IFF looking for us to endorse candidates.

IFF doesn't endorse candidates and our game is tight.

Nice try, mysterious person who totally isn't Graf.

#idleg #idpol



Dustin Hurst @HurstforIdaho · 17 Nov 22

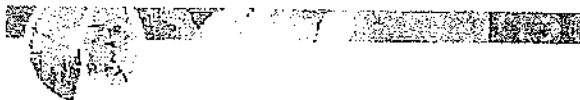
Remember that one time graf tried to impersonate me and I shut that down so quickly?



Dustin Hurst @HurstforI... · 17 Nov 22

That was easy. #ideology

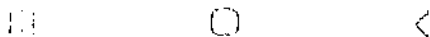
Sorry Graf.



@HurstTruth



Account suspended

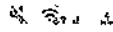


DH-0032

Exhibit D

DH-0033

2:59



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 10 Nov 22  
Amazing to watch @FLVanderSloot distance himself from toxic @gsgraf.

Sounds very much like **Graf** was a problem employee. Frank said **Graf** had to be put on strict guidelines because of his ugly political antics.

**Graf?** A problem employee? I'm stunned.

#idpol

4 3 6



**Dustin Hurst** @HurstforIda... · 08 Nov 22  
Do I need to send tissues to **Graf** and the silly socialist?

**Dustin Hurst** @Hurstfor... · 08 Nov 22

Here's a solid prediction:

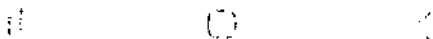
By the end of the day, we will see that Labrador is more popular than Little.

2 1 2



**Dustin Hurst** @HurstforIda... · 30 Sep 22  
See??? Idaho Food Bank could use the

Cmon, **Graf**. It will be fun!



DH-0033



Exhibit D

DH-0034

3:00



from: @HurstforIdaho graf



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**Dustin Hurst** @HurstforIda... · 30 Sep 22  
See??? Idaho Food Bank could use the funds.

Cmon, Graf. It will be fun!



**Senator Treg A. Bernt** ... · 30 Sep 22  
Replying to @HurstforIdaho

I would pay to see you and @gsgraf box for charity. I would even purchase all the tickets in the 1st row, provide all the popcorn, drinks, and cigars...! 🍷🍷



2



**Carter Braxton Worth** @CarterBWorth  
Join Worth Charting today to learn to read stock charts, calmly, confidently...identifying key inflection points when a stock is poised to break out, or break down. Get an edge on the market from Carter's 32 years of insight and experience. Live technical analysis videos nightly



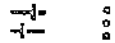
Exhibit D

DH-0035

3:00



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIda... · 29 Sep 22  
Maybe I need to create a hologram of myself and give it to Graf. Maybe that would end the obsession with me.

Hmmmmm

This quoted Tweet is unavailable.

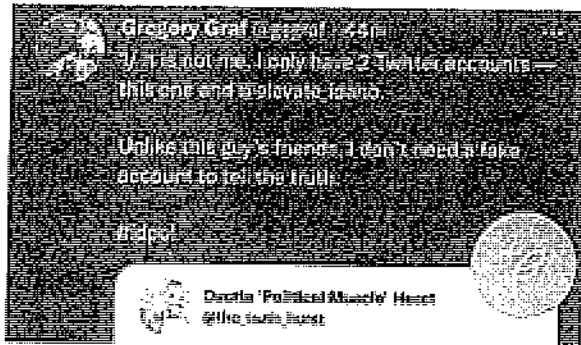
2 2 3



Dustin Hurst @HurstforIdaho · 17 Nov 22  
Someone tracked fake accounts he had on Facebook at one point. This person suggested Graf likely had at least 40 accounts.

leftpotato2018 @leftpot... · 17 Nov 22  
Replying to @HurstforIdaho

Tell me you're not obsessed with me by telling me your not obsessed with me.  
What a



11 0 <

DH-0035

DH-0036

3:00



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 08 Oct 22  
Uh....beta boy graf backs down easily here.

This is fascinating.

This quoted Tweet is unavailable.



Dustin Hurst @HurstforIdaho · 31 Oct 22  
Replying to @rightidahoan @RobbieBurnett  
and @gsgraf

It's a fake controversy designed to get me to  
be quiet about Graf's evil behavior.



Miahcombat @Miahcombat\_co  
Grandpa And Grandson.  
[miahcombat.com/collection/fat...](https://miahcombat.com/collection/fat...)

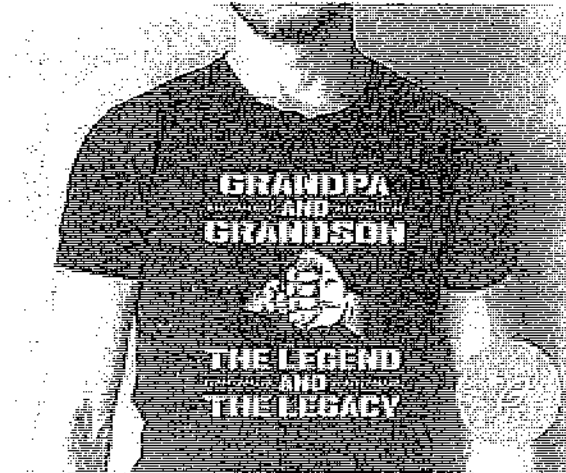



Exhibit D

DH-0037


3:00 [icons]


← from:@HurstforIdaho graf [icons]

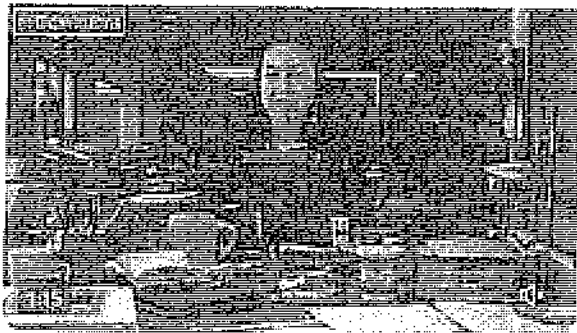
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 **Dustin Hurst** @HurstforIdaho · 22 Jul 22  
 Replying to @PuttingRight @tylerhurstID and @MagnumKhan1  
 Tried that with Graf. He wussed out. Maybe Tyler wont.


[icons]

 **Dustin Hurst** @HurstforIdaho · 13 Oct 22  
 Omg. Graf and @TaylorLorenz are the same person.

 **@stevenvoiceover** @s... · 13 Oct 22  
 Taylor Lorenz, The One Woman Wrecking Crew...



[icons]

 **Dustin Hurst** @HurstforIdaho · 11 Oct 22  
 Replying to @HurstforIdaho  
 For example, @gsgraf is likely voting for abortion-loving Arkoosh.

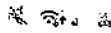
That's not the conservative thing to do.

[icons]

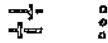
Exhibit D

DH-0038

3:00



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 11 Oct 22

Replying to @HurstforIdaho

For example, @gsgraf is likely voting for abortion-loving Arkoosh.

That's not the conservative thing to do.

But Graf isn't a conservative.

#idpol



1



2



8



Dustin Hurst @HurstforIda... · 25 Nov 22

Replying to @tammy\_is\_scum

@nicholsforidaho and 6 others

Writes just like Graf.

It's graf.



2



1



Travlerz2 @Travlerz2

Thanks to these maps, we can now better understand things that were previously difficult to comprehend. 🤔

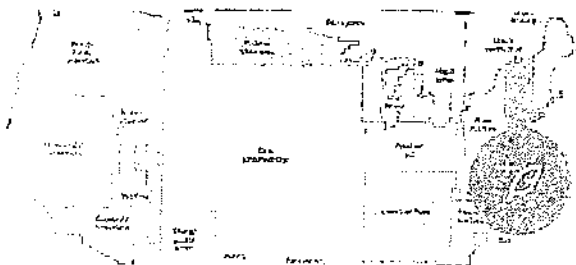
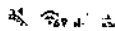


Exhibit D

DH-0039

3:00



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 23 Jul 22

Replying to @danielwinvw and @DanielWinlander

But...why should Republicans help a news source funded by the left? Maybe Graf can explain.



**Dustin Hurst** @HurstforIdaho · 11 Nov 22

Replying to @tylerhurstID @BjornHandeen and 3 others

Start with your besty graf.



**Dustin Hurst** @HurstforIdaho · 01 Aug 22

Replying to @abrittain\_11 @nicholsforidaho and @idus\_pat

You know it's weird that you never accused me of having a crush on Greg Graf, even though I went back and forth with him. So, what gives?



**Dustin Hurst** @HurstforIdaho · 23 Sep 22

Replying to @EileenCordin

I mean @Josh\_Gibbons is a hotty and @brian\_tenney has a killer beard.

Wait....I'm turning onto Graf. Whoops.



DH-0039

Exhibit D

DH-0040

3:01

🔍 📧 📧 📧

← from:@HurstforIdaho graf

📧 📧

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**Dustin Hurst** @HurstforIdaho · 23 Sep 22

Replying to @EileenCordin

I mean @Josh\_Gibbons is a hotty and @brian\_lenney has a killer beard.

Wait....I'm turning onto Graf. Whoops.

🗨️ 1 ↻ 📍 1 📷 📧



**Dustin Hurst** @HurstforIda... · 20 Aug 22

Replying to @gsgraf @KTVBBrian and 2 others

Graf gets it wrong again. As usual.

🗨️ ↻ 📍 📷 📧



**Dustin Hurst** @HurstforIdaho · 22 Oct 22

Replying to @MstlyPeacefulEP

@roemercathy and 2 others

It's odd that Tyler isn't condemning Lori Otter, Greg Graf, Pattie Anne Lodge and others.

I wonder why that is. 😏

🗨️ 1 ↻ 📍 📷 📧



**Dustin Hurst** @HurstforIdaho · 18 Nov 22

Replying to @leftpotato2018

And Wayne doesn't pay me to harass Graf.

He pays me to win. So I do.



Holding Graf accountable is just one perk of

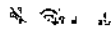
📷 🗨️ 1 ↻

DH-0040

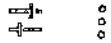
Exhibit D

DH-0041

3:01



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 18 Nov 22

Replying to @leftpotato2018

And Wayne doesn't pay me to harass Graf.

He pays me to win. So I do.

Holding Graf accountable is just one perk of being in this space as a person.



**Dustin Hurst** @HurstforIdaho · 21 Aug 22

Replying to @brockforidaho

No one is bringing in your family. Stop listening to your boyfriend Graf.

Maybe that's what you mean by family.

Take your L.



**Dustin Hurst** @HurstforIda... · 02 Aug 22

Replying to @abrittain\_11

It's creepy, Ashley. It's graf-like.



**Dustin Hurst** @HurstforIdaho · 31 Dec 22

Cry harder, graf



**Dustin Hurst** @HurstforIdaho · 08 Oct 22





Exhibit D

DH-0042

3:01

← from:@HurstforIdaho graf

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**Dustin Hurst** @HurstforIdaho · 31 Dec 22  
Cry harder, graf

🗨️ 🔄 ❤️ 📊 59 🌐



**Dustin Hurst** @HurstforIdaho · 08 Oct 22  
Replying to @EileenCordin  
Graf is shook, as the kids say.

🗨️ 🔄 ❤️ 1 📊 🌐



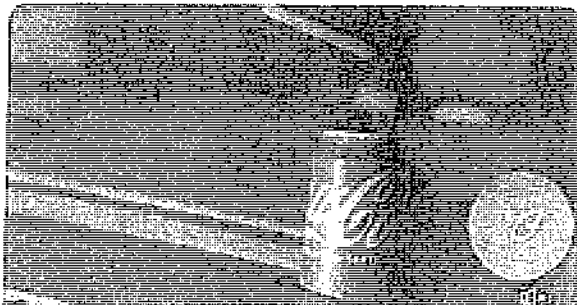
**Dustin Hurst** @HurstforIdaho · 31 Oct 22  
Replying to @HurstforIdaho and @abelightoller  
Oh. Fake account. I see it now.

Hi Greasy Graf!

🗨️ 🔄 ❤️ 📊 🌐



**Maverik, Inc.** @Maverik  
Maverik & Coke teamed up to give away a tricked-out 2022 Mercedes Benz Sprinter and \$20,000 in the Happy Camper sweepstakes.



📊 🗨️

Exhibit D

DH-0043

3:01

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← from:@HurstforIdaho graf

🔍 ⋮

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**Dustin Hurst** @HurstforIdaho · 23 Jul 22

Replying to @danielwinvw and @DanielWinlander

Meaning: Of course graf and Tyler were going to make hay of the pizza thing. They are political operators (tho one is much smarter than the other). That's to be expected. As I said, their sin isn't talking a reporter, but talking to a lefty.

💬 2 🔄 ❤️ 1 📄 🔗



**Dustin Hurst** @HurstforIdaho · 23 Sep 22

Replying to @gsgraf and @brian\_jenney

Graf's employer? He means the FBI, right?

💬 1 🔄 ❤️ 1 📄 🔗



**Dustin Hurst** @HurstforIdaho · 18 Nov 22

Replying to @TheJonGrubb and @leftpotato2018

@leftpotato2018

Smart. Just don't let graf sue you.

💬 🔄 ❤️ 1 📄 🔗



**Dustin Hurst** @HurstforIdaho · 17 Nov 22

Replying to @leftpotato2018

Done and done. Working with Twitter support now.

Can I sue graf for this?



What amazes me is that he woke up this

morning and did not think. Then he went to

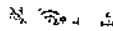
📄 🔄 <

DH-0043

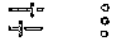
Exhibit D

DH-0044

3:01



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 17 Nov 22

Replying to @leftpotato2018

Done and done. Working with Twitter support now.

Can I sue graf for this?

What amazes me is that he woke up this morning and dreamt this up. Then he put his dumb plan into action.

He should hit the gym instead of doing stupid stuff.



**Dustin Hurst** @HurstforIda... · 08 Nov 22

Replying to @PuttingRight and @gsgraf

We told not Graf to put some pants on and leave mom's basement. Sunlight is good for the soul.



**Cal** @imcalshort

AI is a liar.

For article writers, this is a huge problem.

So I built Reword, an article editor that fact-checking and citations built in.






We did what ChatGPT couldn't



Exhibit D

DH-0045

3:01   



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 21 Aug 22

Replying to @brockforidaho

No one is bringing in your family. Stop listening to your boyfriend Graf.

Maybe that's what you mean by family.

Take your L.



2



**Dustin Hurst** @HurstforIda... · 20 Aug 22

Replying to @gsgraf @KTVBBrian and 2 others

Graf gets it wrong again. As usual.



**Dustin Hurst** @HurstforIda... · 02 Aug 22

Jane, Emily, Mike, graf, & socialist think they have the numbers to change anything in Idaho.

How cute.

Meanwhile, conservatives are about to elect Dan Foreman, Scott Herndon, Glenneda Zuiderveld, Tammy Nichols, Brian Lenney, & others.

This will be an epic tantrum. #idleg

3



7



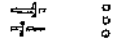
Exhibit D

DH-0046

3:02



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 23 Jul 22

Replying to @danielwinvw and @DanielWinlander

But...why should Republicans help a news source funded by the left? Maybe Graf can explain.



Dustin Hurst @HurstforIdaho · 23 Jul 22

Replying to @danielwinvw and @DanielWinlander

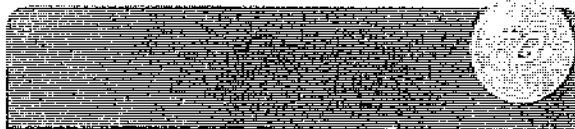
Meaning: Of course graf and Tyler were going to make hay of the pizza thing. They are political operators (tho one is much smarter than the other). That's to be expected. As I said, their sin isn't talking a reporter, but talking to a lefty.



PowerA Gaming @PowerA

4-in-1 Modular Design  
Mappable Advanced Gaming Buttons  
Up to 60 hours of playtime on a single charge

For playing how you want, whenever you want



DH-0046

Exhibit D

DH-0047

3:02

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← from:@HurstforIdaho graf

🔍 📧 📷

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**Dustin Hurst** @HurstforIdaho · 22 Jul 22  
Replying to @PuttingRight @tylerhurstID and @MagnumKhan1  
Tried that with **Graf**. He wussed out. Maybe Tyler wont.

🗨️ ↻️ ❤️ 1 📷 📧



**Dustin Hurst** @HurstforIdaho · 22 Jul 22  
Replying to @HurstforIdaho  
6. Conservatives, you can't take the high ground if you can't call out your own. RINOs never take responsibility for their stuff. We should be better than that.

7. **Graf** is still a scumbag.

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**Dustin Hurst** @HurstforIdaho · 22 Jul 22  
Replying to @HurstforIdaho  
3. Their sin is talking with a leftist reporter. Goodness how stupid are they?  
  
4. **Graf** wants to make this whole stupid thing about me and my brother because this reveals his operation.  
  
5. I respect Tyler like crazy even if I think he is dead wrong on lots of stuff.

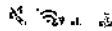
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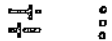
Exhibit D

DH-0048

3:02



← from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 22 Jul 22

Replying to @HurstforIdaho

3. Their sin is talking with a leftist reporter. Goodness how stupid are they?

4. Graf wants to make this whole stupid thing about me and my brother because this reveals his operation.

5. I respect Tyler like crazy even if I think he is dead wrong on lots of stuff.



Dustin Hurst @HurstforIdaho · 22 Jul 22

Omg so much stupid tonight.

Let's clear some stuff up:

1. The RINOs like Graf and Tyler didn't cook up this scandal. Reilly probably did it and he should apologize.

2. Graf and Tyler certainly helped spread the scandal. These guys wants to punish their foes. So?



Baltimore Ravens · @Ravens

"I love Coach Todd." @ZayFlowers



Go inside Minicamp in Wired

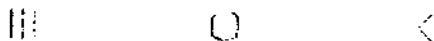


Exhibit D

DH-0049

3:02



← from:@HurstforIdaho graf




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Dustin Hurst @HurstforIdaho · 22 Jul 22  
Well.

Graf and Schroeder are democrats.  
Tyler isn't, but he like to be in the mix.

Conservatives have no real reason to talk to  
leftist media outlets. None.

 Jake Melder @jake\_melder · 21 Jul 22  
Replying to @IdahoTribune

Hardline conservatives: "We refuse to talk  
to the media!"  
Also hardline conservatives: "Look! The  
media talks with everyone who isn't us.  
CoLLuSion!!"...

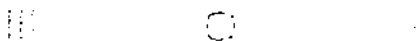
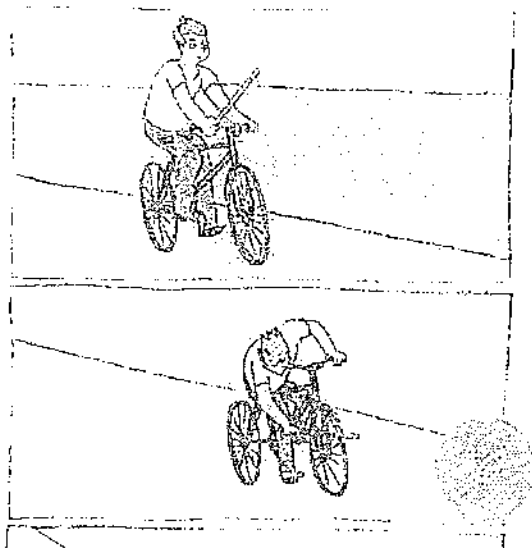




Exhibit D

DH-0050

3:02 [icons]

← from:@HurstforIdaho graf [icons]

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**Dustin Hurst** @HurstforIdaho · 16 Jul 22  
Don't take advice from commies like Graf.

This quoted Tweet is unavailable.

[icons]



**Dustin Hurst** @HurstforIdaho · 16 Jul 22  
Replying to @RealBearSmith  
@KelcieMMorris and @gsgraf  
They spread because dishonest bitches like  
Graf want to ruin me.

[icons]



**Dustin Hurst** @HurstforIdaho · 16 Jul 22  
Greasy  
Greg  
Graf

[icons]



**Morning Brew** @MorningBrew  
Experience the insightful exploration of the  
vital connection between compliance and  
infoSec in the rapidly growing digital health  
industry. Catch the on-demand event,  
sponsored by @thoropass!

[trib.al/E9t6ZfY](https://trib.al/E9t6ZfY)



[navigation icons]

DH-0050

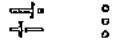
Exhibit D

DH-0051

3:02



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 16 Jul 22

Also, Greg Graf doesn't care about the homeless. At all.

Where are his previous tweets on that issue?

There are none.

He is also using homeless people as political pawns to show how virtuous he is. It's just as disgusting as the pizza stunt.



Dustin Hurst @HurstforIdaho · 16 Jul 22

Replying to @gsgraf

Notice the language here.

'Claims he didn't do it.'

Not: He didn't do it.

I provided proof. And Graf saw it.

This guy is completely unhinged.

Losing constantly does that to you, I bet.



Dustin Hurst @HurstforIdaho · 15 Jul 22

This is textbook @gsgraf. Something happens and he speculates that IFF did it "I



Exhibit D

DH-0052

3:02

🔍 📧 🗑️

← from:@HurstforIdaho graf

🔍 📧 🗑️

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**Dustin Hurst** @HurstforIdaho · 15 Jul 22  
This is textbook @gsgraf. Something bad happens and he speculates that IFF did it. "I have questions."

He has no proof. He never does. He just spews his bullshit, and dummies pick it up. **Graf** is a master manipulator.

Grow up. (In the meantime, I'll save screenshots.)

#idleg

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**Dustin Hurst** @HurstforIdaho · 15 Jul 22  
Replying to @abrittain\_11  
And acting liking **Graf** isn't a good look.

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**Dustin Hurst** @HurstforIdaho · 13 Jul 22  
**Graf** pals around with socialists?

Literally no one is shocked.

Love me a nice screenshot.

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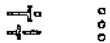
Exhibit D

DH-0053

3:02



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 07 Jul 22  
Holy cow @CKomatsoulis...your story on Chad is horribly incomplete. You failed to note that bogus-lawsuit-filer @gsgraf defamed Chad and tried to get him fired a couple of years back. There's an ongoing legal battle over it. This is simply Graf's suit with others involved.



**Dustin Hurst** @HurstforIdaho · 30 Jun 22  
Replying to @IDstoryteller and @gsgraf  
Graf is obsessed with ruining me and Greg Pruett because his ideas and tactics aren't successful in Idaho politics. He started obsessing over us years ago. I mean, look at the dude's profile pic.



**Dustin Hurst** @HurstforIdaho · 30 Jun 22  
[youtu.be/EHBMbZdCpSk](https://youtu.be/EHBMbZdCpSk)

In case you were curious, maniac @gsgraf can't cancel me.

A sign of things to come. Twitter sided with me just like the judge will in Graf's bogus lawsuit.

I love winning.



DH-0053

Exhibit D

DH-0054

3:02

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← from:@HurstforIdaho graf

🔍 ⋮

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Dustin Hurst @HurstforIdaho · 29 Jun 22

Replying to @gsgraf

Ever heard of satire graf? You are a walking joke, so you should be intimately familiar.

🗨️ 1 ↻ ❤️ 📄 📧



Dustin Hurst @HurstforIdaho · 28 Jun 22

Replying to @gsgraf and @tucker\_id

Didn't happen, Greasy Graf.

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Dustin Hurst @HurstforIdaho · 27 Jun 22

Next genius Graf will blame Daybell and Vallow on IFF. You watch. It's coming.

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Dustin Hurst @HurstforIdaho · 23 Jun 22

Replying to @BerntForIdaho and @gsgraf

Two things:

1. You can unfollow us.
2. Graf started this war. He can certainly end it. He knows how.

🗨️ 1 ↻ ❤️ 📄 📧



unbottled @un\_bottled

What if I didn't add cream? What if I did no cheese pizza? What if I served hamburgers over cheeseburgers? Sometimes...

📄 🗨️ ↻ <

Exhibit D

DH-0055

3:03



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 22 Jun 22

Replying to @gsgraf

Where? I would love your proof on that. Graf, don't make me sue you. I hear you didn't do well in deposition today.



**Dustin Hurst** @HurstforIdaho · 15 Jun 22

Another question: is Greg Graf planning to open a NAMBLA chapter in Idaho?

More questions than answers at this point.



**Dustin Hurst** @HurstforIdaho · 14 Jun 22

Given that Graf issued a violent threat against me a few weeks ago, I'm wondering if I need to take extra precautions at the GOP convention next month. Who knows what that maniac is capable of.



**Dustin Hurst** @HurstforIdaho · 14 Jun 22

Replying to @gsgraf and @Deadpool\_Slaps

I'm accusing you of nothing.

I'm simply asking questions Greg Graf style.

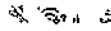
I learned from the smartest guy on th



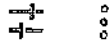
DH-0055

DH-0056

3:03



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 14 Jun 22  
Replying to @gsgraf and @Deadpool\_Slaps  
I'm accusing you of nothing.

I'm simply asking questions Greg Graf style.

I learned from the smartest guy on the net.



UNITED FOR  
PATENT REFORM

**United4PatentReform** @U4PatentR...  
Thousands of businesses were threatened by  
an NPE and told to pay \$1000 for using a  
function that was built into scanners they'd  
already purchased. The scanner  
manufacturers challenged the patent at the  
USPTO and it was invalidated.  
#StandWithMainStreet

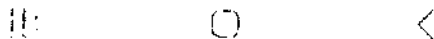


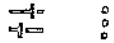
Exhibit D

DH-0057

3:03



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 14 Jun 22  
Does Greg Graf attend NAMBLA events?

The world deserves to know!



Dustin Hurst @HurstforIdaho · 14 Jun 22  
Replying to @danielwinvw @DanielWinlander  
and @gsgraf

Actually in the Central Time Zone.....

Gotta check nutcase like Graf and the media  
because no one else will.



Dustin Hurst @HurstforIdaho · 14 Jun 22  
Replying to @danielwinvw @DanielWinlander  
and @gsgraf

Two things....

1. Why are you awake?
2. This ends when Graf stops mentioning me  
and my organization with his dishonest and  
false tweets.



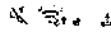
Dustin Hurst @HurstforIdaho · 13 Jun 22  
Is @gsgraf a member of Patriot Front?  
does he know so much about their  
operations? Is he their Idaho contact?



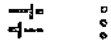


DH-0058

3:03



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
Is @gsgraf a member of Patriot Front? How does he know so much about their operations? Is he their Idaho contact?

I know Graf is the FBI's guy in Idaho....so it makes sense.



**Fast Company** @FastCompany  
4 takeaways from @Deloitte panel on the opportunities and challenges of #artificialintelligence. Takeaways 1 and 2. #AI will transform knowledge work, but it still needs human assistance. @vjkaruna @DangTechNickel #ad



fastcompany.com  
Artificial intelligence and the evolution of trust



Promoted



Exhibit D

DH-0059

3:03

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← from:@HurstforIdaho graf

🔍 🗨️ 📧

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Dustin Hurst @HurstforIdaho · 13 Jun 22  
Greg Graf seems to know everything about IFF.

Is he secretly an IFF staffer????

🗨️ ↻️ ❤️ 2 📊 🔊



Dustin Hurst @HurstforIdaho · 13 Jun 22  
It looks like one of the drag queens might have exposed itself to a kid in CDA.

Does Greg Graf support this behavior??

🗨️ 2 ↻️ ❤️ 1 📊 🔊



Dustin Hurst @HurstforIdaho · 13 Jun 22  
Would Graf have attended the PRIDE event to support Satanists and groomers?

We deserve answers, @gsgraf!

🗨️ ↻️ ❤️ 📊 🔊



Dustin Hurst @HurstforIdaho · 13 Jun 22  
Would Graf have attended to PRIDE event to support Satanists and groomers?

We deserve answers, @gsgraf!

🗨️ 1 ↻️ ❤️ 📊 🔊



Dustin Hurst @HurstforIdaho · 13 Jun 22  
Graf is a bully. He thinks he can say what he wants without accountability or pushback. Then he

📊 🗨️ 🔊

Exhibit D

DH-0060

3:03



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
Graf is a bully. He thinks he can say whatever without accountability or pushback. Then he cries like a baby and plays victim when someone beats him at his own game.

Dude needs serious help.



**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
Is Greg Graf Donating thousands to NAMBLA?

Answers! We need answers.

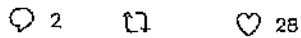


**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
Replying to @gsgraf  
Jusr asking questions the way you do, Greasy Graf.

If I'm unhinged, I'm only following your lead.

Don't like it? Stop bring an idiot or file a lawsuit.

And cry harder.



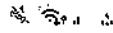
**Gregory Graf** @gsgraf · 19h



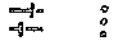
DH-0060

DH-0061

3:03



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 13 Jun 22

Replying to @gsgraf

Jusr asking questions the way you do, Greasy Graf.

If I'm unhinged, I'm only following your lead.

Don't like it? Stop bring an idiot or file a lawsuit.

And cry harder.

... (truncated text)

2 28



Gregory Graf @gsgraf · 19h

Is the Idaho Freedom Foundation chairman the one fronting Patriot Front in CDA? #idpol



Exhibit D

DH-0062

3:03

🔍 📧 📌

← from:@HurstforIdaho graf

🔍 📧 📌

Top Latest People Photos Videos



Dustin Hurst @HurstforIdaho · 13 Jun 22  
Replying to @AntifaWhisperer and @gsgraf  
So, by your weak logic.....Is Graf fronting  
Patriot Front in CDA??

🗨️ 2 🔄 📌 28 🔗



Gregory Graf @gsgraf · 19h  
Is the Idaho Freedom Foundation  
chairman the one fronting Patriot Front  
in CDA? #idpoi



🗨️ 1 🔄 📌 📌 🔗



Dustin Hurst @HurstforIdaho · 13 Jun 22  
Replying to @HurstforIdaho and @gs  
Is Greg Graf doing cocaine every wee



🔍 📧 📌

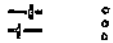
Exhibit D

DH-0063

3:03



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
Replying to @HurstforIdaho and @gsgraf  
Is Greg Graf doing cocaine every weekend?

Is Greg Graf a closeted . . . Democrat?

Is Greg Graf giving big money to fund the  
Idaho 97%, the ACLU, and NAMBLA?

IMPORTANT, TOTALLY SERIOUS QUESTIONS  
THAT NEED ANSWERS. #idleg



**Dustin Hurst** @HurstforIdaho · 13 Jun 22  
What never ceases to amaze me is that  
political hack & bogus-lawsuit-filer @gsgraf  
can say literally whatever nonsensical  
bullshit that comes to mind as long as he  
puts a questions mark behind it.

It's his game.

Like this: Is Greg Graf secretly on Idaho Dems  
payroll?

#idleg



**Dustin Hurst** @HurstforIda... · 19 M  
Replying to @AJFrugoli and  
@AmericanVeritas



DH-0064

3:03

🔍 📧 🗑️



from:@HurstforIdaho graf

🔍 ⋮

Top Latest People Photos Videos



**Dustin Hurst** @HurstforIda... · 19 May 22

Replying to @AJFrugoli and @AmericanVeritas

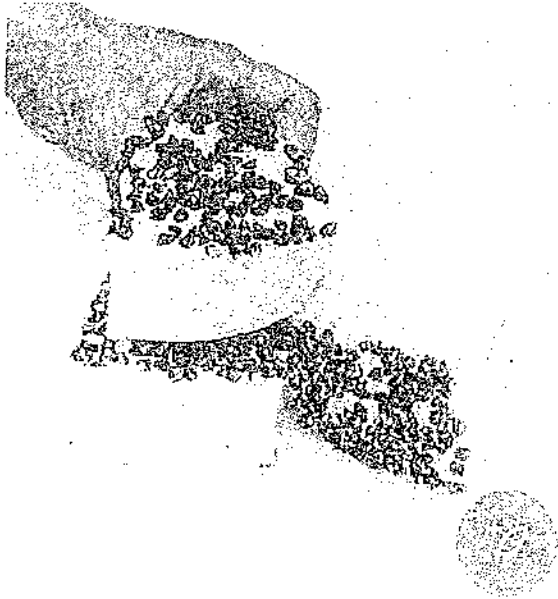
Huh. Well, when i started using it, i was unaware of **Graf's** minority status. I rightly described how he operates. So, the moniker continues.

💬 🔄 ❤️ 📄 🔊



**Annie Frannies** @AnnieFrannies

If you've been thinking of trying our gourmet marshmallows. We are offering Buy 3 Get 1 Free. Plus we are tripling the quantity of marshmallows for each flavor. Example: buy a 3pc receive a 9pc.



📄 🗑️ 🔍

Exhibit D

DH-0065

3:04



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 17 May 22  
Replying to @PuttingRight @gsgraf and @FBI  
Oh I forgot that greasy Graf is the FBI's top  
guy in Idaho!



Dustin Hurst @HurstforIdaho · 17 May 22  
Greasy  
Greg  
Graf



Dustin Hurst @HurstforIdaho · 17 May 22  
Will @gsgraf's pathetic minion be able to  
serve me today for his frivolous, baseless  
lawsuit?

We will see, but things arent look up for  
Greasy Greg Graf.



Dustin Hurst @HurstforIda... · 16 May 22  
I point out Graf's dangerous, violent threat  
and he responds 9 mins later.

Yup. I was right. It was a violent threat. Else,  
he wouldnt have needed to cover his ass.

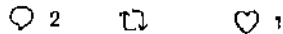




Exhibit D

DH-0066

3:04



from:@HurstforIdaho graf



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**Dustin Hurst @HurstforIda...** · 16 May 22

I point out Graf's dangerous, violent threat and he responds 9 mins later.

Yup. I was right. It was a violent threat. Else, he wouldnt have needed to cover his ass.



**Gregory Graf**  
@gsgraf

... in court.

3:24 PM · 12 May 22 · Twitter for iPhone

1 Like



**Dustin Hurst @Hurstfor...** · 12 May 22

Im told this TV character murdered several people in Yellowstone.

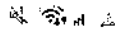


DH-0066

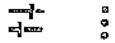
Exhibit D

DH-0067

3:04



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIda... · 12 May 22  
Officially reported to @BonnevilleCSO. Graf is unhinged and dangerous.

**Dustin Hurst** @Hurstfor... · 12 May 22  
Im told this TV character murdered several people in Yellowstone.

This is a violent threat, @BonnevilleCSO. Graf is obsessed enough to physically h...



**Dustin Hurst** @HurstforIda... · 12 May 22  
There's no feud.

Just a whiny little bitch nipping at my heels. Graf is a keyboard cowboy and nothing more.



**Dustin Hurst** @HurstforIda... · 12 May 22  
Im told this TV character murdered several people in Yellowstone.

This is a violent threat, @BonnevilleCSO. Graf is obsessed enough to physically harm me and Greg Pruett. He deserves a visit.

#idpol #idleg



**Dustin Hurst** @Hurstfor... · 12 May 22



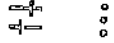
Exhibit D

DH-0068

3:04



from:@Hurstforidaho graf



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Dustin Hurst @HurstforIda... · 12 May 22  
Im told this TV character murdered several people in Yellowstone.

This is a violent threat, @BonnevilleCSO. Graf is obsessed enough to physically harm me and Greg Pruett. He deserves a visit.

#idpol #idleg



Dustin Hurst @Hurstfor... · 12 May 22  
Wondering if Greasy Greg Graf is issuing a violent threat. Sure looks like it.

@BonnevilleCSO, you might check on this lunatic before he does something d...



@gsgraf

Current mood. #idpol #idleg  
#idgap



Exhibit D

DH-0069

3:04

🔍 📧 📧 📧

← from:@HurstforIdaho graf


🔍 ⋮

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**Dustin Hurst** @HurstforIda... · 12 May 22  
Wondering if Greasy Greg Graf is issuing a violent threat. Sure looks like it.

@BonnevilleCSO, you might check on this lunatic before he does something deadiy.

 @gsgraf

Current mood. #idpol #idleg  
#idgop



1:53 PM · 12 May 22 · Twitter for iPhone

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**PPTA** @PlasmaProteins  
#ICYMI The Albumin Learning Network is

☰ ○ <

Exhibit D

DH-0070

3:04

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from:@HurstforIdaho graf



Top Latest People Photos Videos



**Dustin Hurst** @HurstforIdaho · 11 May 22

Replying to @HurstforIdaho @eric\_mcgilp and @gsgraf

Truthfully, Graf is nothing more than a cowardly keyboard cowboy. That bitch doesn't have the guts to stand in the same room with real conservatives.



♥ 1



**Dustin Hurst** @HurstforIdaho · 11 May 22

Replying to @TyroneWallingha and @gsgraf

We hurt Graf's feelings, so he lawyered up like a bitch.



**Dustin Hurst** @HurstforIdaho · 28 Apr 22

Greasy Greg Graf



**Dustin Hurst** @HurstforIdaho · 19 Apr 22

Greasy

Greg

Graf



**Dustin Hurst** @HurstforIdaho · 18 Apr 22

Oh darn. Graf, Walton, and Satz have very little influence.

Who could have seen that?



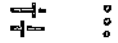
Exhibit D

DH-0071

3:04



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 18 Apr 22  
Oh darn. Graf, Walton, and Satz have very little influence.

Who could have seen that?

These folks are nothing more than noisy clowns. #idleg #idpol

This quoted Tweet is unavailable.



**Dustin Hurst** @HurstforIdaho · 16 Mar 22  
Greasy.  
Greg.  
Graf.



**Dustin Hurst** @HurstforIdaho · 11 Mar 22  
Graf is a professional victim.

Tweets Tweets & replies Media Likes



**Gregory Graf** @gsgraf · 6h  
No discussion about how things are going should start with, "are you safe?"



Show this thread



**Gregory Graf** @gsgraf · 6h



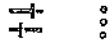
Exhibit D

DH-0072

3:04



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 11 Mar 22  
Graf is a professional victim.

Tweets Tweets & replies Media Like



Gregory Graf @gsgraf · 6h  
No discussion about how things are going should start with, "are you safe?"

Reply Retweet 5 Like

Show this thread



Gregory Graf @gsgraf · 6h  
I never expected conversations with friends would include body armor recommendations for me and my EDC defense competency. I guess it's come to that now.

For the record, I'm loving the new Sig 365 with Romeo red dot. #idpol

Reply Retweet 3 Like

Show this thread

2 Reply Like Retweet Like



Dustin Hurst @HurstforIdaho · 28 Feb 22  
Goodnight, Graf. Keep trying to win one. You'll get there someday, you pathetic troll.

1 Reply 1 Like Retweet



Dustin Hurst @HurstforIdaho · 28 Feb 22

Retweet Reply Like

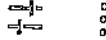
Exhibit D

DH-0073

3:05



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 28 Feb 22

Goodnight, Graf. Keep trying to win one. You'll get there someday, you pathetic troll.



Dustin Hurst @HurstforIdaho · 28 Feb 22

Replying to @gsgraf  
Projection is a thing, Graf.



Dustin Hurst @HurstforIdaho · 28 Feb 22

Replying to @gsgraf  
What's important to understand is that this unethical tactic serves as nothing more than another front for Graf's political operation, an apparatus built to destroy the Idaho Second Amendment Alliance, the IFF, and any lawmakers who don't bow to Graf's ...bullying.



Dustin Hurst @HurstforIdaho · 28 Feb 22

Replying to @gsgraf  
"It is in the shadows, in my opinion, that Graf reveals himself as something far darker. He represents the worst of American politics and incivility."



Dustin Hurst @HurstforIdaho · 28 Feb 22



DH-0073

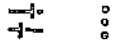


DH-0074

3:05



from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 28 Feb 22

Should I block Greasy Graf?

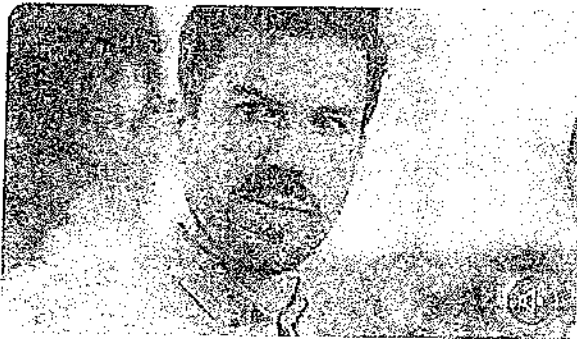


16 votes · Final results



Stellar ... @StellarOrg

Argentines now have an easy and accessible way to protect themselves from the devaluation of the peso with Vibrant, powered by Stellar. Learn how it works and how users are gaining their financial freedom.



stellar.org  
Vibrant: Built On Stellar



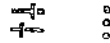
Exhibit D

DH-0075

3:05



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 28 Feb 22

Replying to @gsgraf

We have the audio Graf. It's your voice on there. Unless there is some sort of conspiracy here. Did we fake your voice, too?

You probably can't answer, as you are the FBI's guy here in Idaho.

Rofl

#greasygraf



**Dustin Hurst** @HurstforIdaho · 27 Feb 22

Replying to @gsgraf and @ChristaHazel

Take a look in the mirror, Greasy Graf.



**Dustin Hurst** @HurstforIdaho · 27 Feb 22

Replying to @gsgraf and @ChristaHazel

Literally a fact, Greasy Graf



**Dustin Hurst** @HurstforIdaho · 27 Feb 22

Greasy Graf: Man! I just spent hours finding this obscure thing IFF said years ago. I've got them this time!

Dustin: inconvenient facts that graf missed or ignored



DH-0076

3:05

🔒 🌐 📧



from:@HurstforIdaho graf

🔒 ⋮

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**Dustin Hurst** @HurstforIdaho · 27 Feb 22  
Greasy Graf: Man! I just spent hours finding this obscure thing IFF said years ago. I've got them this time!

Dustin: inconvenient facts that graf missed or ignored

Greasy Graf: RACIST!!!

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**Alliance for Automotive Innovation** ...  
Never leave your child behind in a car. Never. Prevent heatstroke death and injuries. #LookBeforeYouLock



autosinnovate.org  
#LookBeforeYouLock

🗨️ 🔄 1 ❤️ 📄 43.8K 🔊

📌 Promoted



**Dustin Hurst** @HurstforIdaho · 27 Feb  
Retweeting to @esgraf and @ChristaHazel

📄 🗨️ 🔄

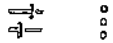
Exhibit D

DH-0077

3:05



from:@HurstforIdaho graf



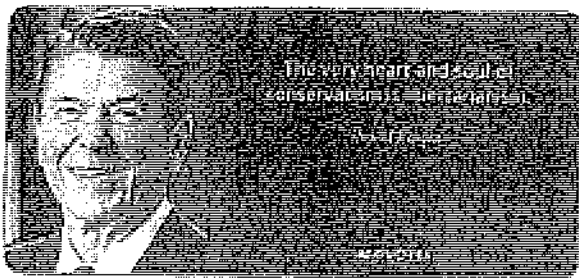
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Dustin Hurst @HurstforIdaho · 27 Feb 22

Replying to @gsgraf and @ChristaHazel

Take a look, Greasy Graf:



Dustin Hurst @HurstforIdaho · 26 Feb 22

Replying to @gsgraf @WayneHoff and @idahofreedom

Greasy Graf: Wayne is a big boy! He can support the candidate he wants, you twit. I can't even vote in the gop primary, so I don't care. Leave me alone, Greasy guy



Dustin Hurst @HurstforIdaho · 26 Feb 22

Replying to @gsgraf @WayneHoff and @idahofreedom

Quit being a Greasy slimeball, Graf.



Dustin Hurst @HurstforIdaho · 26 Feb 22  
Replying to @gsgraf @WayneHoff and @idahofreedom



Exhibit D

DH-0078

3:05

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← from:@HurstforIdaho graf

🔍 ⋮

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**Dustin Hurst** @HurstforIdaho · 26 Feb 22

Replying to @gsgraf @WayneHoff and @idahofreedom

Don't care what she does. Am I supposed to? Graf, this is why you are greasy.

💬 2 🔄 📌 1 📊 🌐



**Dying Light** @DyingLightGame

Save up to 50% off Dying Light 2 Stay Human during the Steam Summer Sale! Hordes of infected await 🧟



[dyinglightgame.com](http://dyinglightgame.com)

Get up to 50% off during the Steam Summer Sale!

💬 1 🔄 1 📌 18 📊 31K 🌐

📌 Promoted



**Dustin Hurst** @HurstforIdaho · 23 Feb

Graf, a sleazeball, wrote that stupid smear IFF and harm liberty candidates primary. He and the other morons spent

📊 🗨️ <

DH-0078

Exhibit D

DH-0079

3:05

🔍 📷 🗨️

← from:@HurstforIdaho graf

🔍 ⋮

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**Dustin Hurst** @HurstforIdaho · 23 Feb 22  
Graf, a sleazeball, wrote that stupid article to smear IFF and harm liberty candidates in the primary. He and the other morons spent thousands to promote it.

Then conservatives won more seats than ever.

Great work, Graf. #idleg #idpol

🗨️ 1 🔄 ❤️ 📷 🔊



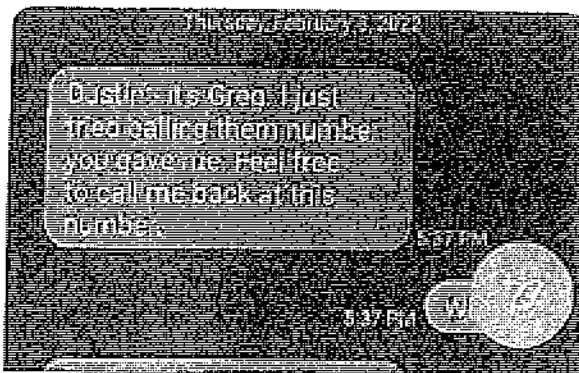
**Dustin Hurst** @HurstforIdaho · 03 Feb 22  
Replying to @idaho\_Liberty76 and @MarianaTe

Greasy Graf is an unhinged, dangerous dude.

🗨️ 🔄 ❤️ 1 📷 🔊



**Dustin Hurst** @HurstforIdaho · 03 Feb 22  
Replying to @ramone\_rita and @gsgraf  
Posting this before Greasy Graf does.



🔍 🗨️ 📷

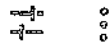
DH-0079

DH-0080

3:05



← from: @HurstforIdaho graf



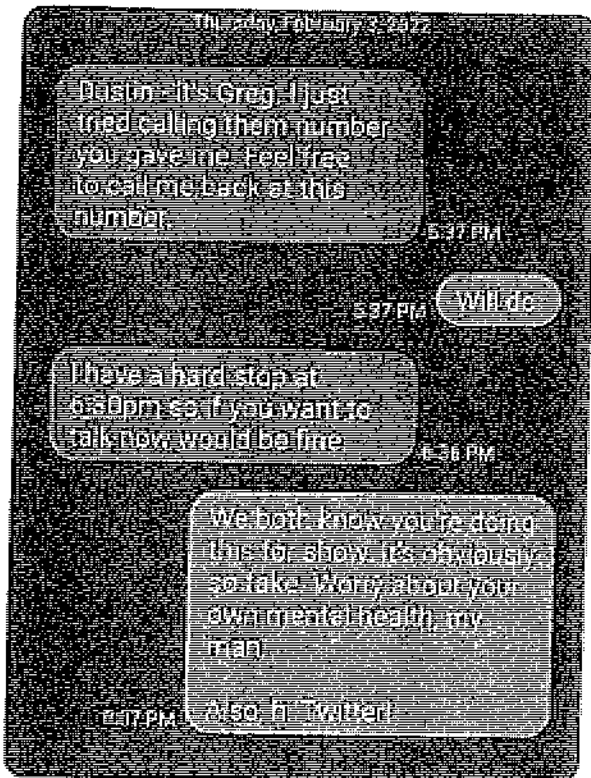
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Dustin Hurst @HurstforIdaho · 03 Feb 22

Replying to @ramone\_rita and @gsgraf

Posting this before Greasy Graf does.



Dustin Hurst @HurstforIdaho · 03 Feb 22

Replying to @ramone\_rita and @gsgraf

Working. Want me to livestream my li



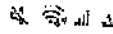
Plus, this is a fake attempt by Graf. He



Exhibit D

DH-0081

3:06



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 03 Feb 22

Replying to @ramone\_rita and @gsgraf

Working. Want me to livestream my life?

Plus, this is a fake attempt by Graf. He started this war. He well endure it.

Or maybe he needs a hobby now that he is unemployed.



**Dustin Hurst** @HurstforIdaho · 03 Feb 22

Unemployment hasn't been kind to you, Greasy Graf.

Luckily, McDonalds is paying \$15 an hour to start.

You started this war. You can't complain when I adopt your tactics, chump.

Go get a job.

This quoted Tweet is unavailable.



**Dustin Hurst** @HurstforIdaho · 02 Feb 22

Greasy Greg Graf.

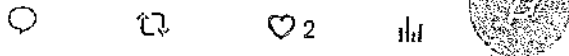




Exhibit D

DH-0082

3:06



← from:@HurstforIdaho graf



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Dustin Hurst @HurstforIdaho · 02 Feb 22  
Greasy Greg Graf.



Dustin Hurst @HurstforIdaho · 29 Jan 22  
Great Graf is whining again.

Dude never quits.



Dustin Hurst @HurstforIdaho · 24 Jan 22  
Replying to @EmmaLeeRobinso4 and @gsgraf  
Greasy = slimeball.

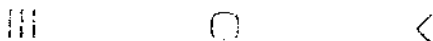
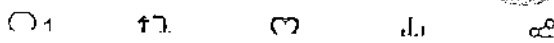
Graf knows that, but he wants to score fake political points.



Dustin Hurst @HurstforIdaho · 24 Jan 22  
Replying to @gsgraf  
Greasy Graf is throwing a tantrum. You hate to see it.



Dustin Hurst @HurstforIdaho · 24 Jan 22  
Replying to @gsgraf and @EmmaLeeRobinso4  
Sure Greasy graf



DH-0082

DH-0083

3:06

🔍 📧 🗨️

← from:@HurstforIdaho graf

🔍 📧 🗨️

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Dustin Hurst @HurstforIdaho · 24 Jan 22

Replying to @gsgraf and @EmmaLeeRobinso4

Sure Greasy graf

🗨️ 1 🔄 ❤️ 📌 🌐



Dustin Hurst @HurstforIdaho · 24 Jan 22

Replying to @gsgraf and @EmmaLeeRobinso4

Ok, Greasy Graf. Big whoop



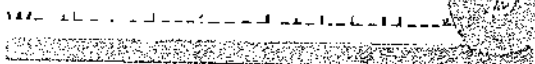
**We are initiating a formal and public Vote of No Confidence in director EmmaLee Robinson.**

132 have signed. Let's get to 200!



**At 200 signatures, this petition is more likely to be featured in recommendations!**

Lisa Bartholomew started this petition to Stakeholders and 4 others



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Exhibit D

DH-0084

3:06

🔍 📧 📧



from:@HurstforIdaho graf



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**Dustin Hurst @HurstforIdaho** · 24 Jan 22  
I know my boy @gsgraf aka Greasy Graf will attend.

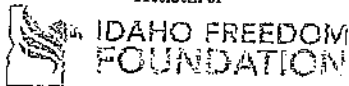
He will learn a thing or two about winning.

**Idaho Freedom Foun...** · 24 Jan 22  
Idaho Falls. Rexburg. Ammon. Ririe. Rigby.  
Rexburg. Roberts. Lewisville. Blackfoot.  
Don't miss this!

Details below! ...



**Wayne Hoffman**  
President of



January 26, 2022  
6:00pm (doors open at 5:30pm)



Idaho Freedom Foundation's mission is to make Idaho into a Laboratory of Liberty by exposing, debating, and replacing the state's socialist public policies.



Sink River Event Center (Shilo Inn)  
780 Lindsay Blvd  
Idaho Falls, ID 83403

Event: [idfreedom.org/shilo](http://idfreedom.org/shilo)

Exhibit D

DH-0085

3:06



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 10 Jan 22  
Replying to @gsgraf @slfisher and 4 others  
Greasy Graf is so mad again.



**Dustin Hurst** @HurstforIdaho · 28 Dec 21  
Greasy Graf.



**Dustin Hurst** @HurstforIdaho · 17 Dec 21  
Replying to @gsgraf and @mexinorseman  
Night Greasy graf

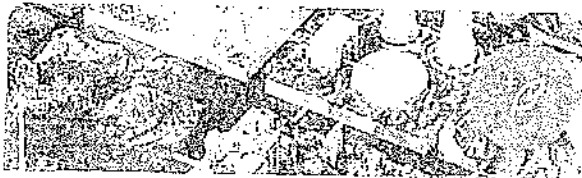


**Dustin Hurst** @HurstforIdaho · 17 Dec 21  
Replying to @gsgraf and @mexinorseman  
Night Greasy graf



**WIRED** @WIRED

AI technology plays a big part in Vistra Corp.'s plans to cut carbon production 60% by 2030. AI-enabled intelligence will also have broad implications for the future of our energy networks.

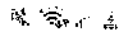


DH-0085

Exhibit D

DH-0086

3:06



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 17 Dec 21

Replying to @gsgraf

Have a great weekend, Greasy Graf!



**Dustin Hurst** @HurstforIdaho · 17 Dec 21

Greasy Graf



**Dustin Hurst** @HurstforIdaho · 17 Dec 21

Replying to @gsgraf

I heard the audio, Greasy Graf. Every single word.

Didn't your boss suspend you for what you did?



**Dustin Hurst** @HurstforIdaho · 17 Dec 21

Greasy Greg Graf wants me to stop talking about how slimy, shady, and Greasy he is.

Not going to happen



.../ads/roosy

**Hankook Tire USA** @HankookTireUSA

Electrify your driving experience

Exclusive EV Tire

ION

Hankook Tire

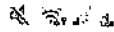


DH-0086

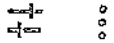
Exhibit D

DH-0087

3:06



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 17 Dec 21  
Greasy Greg Graf!



**Dustin Hurst** @HurstforIdaho · 17 Dec 21  
Yes, I wrote the articles about your attempt to get Chad fired.

I enjoyed every second.

You're an unhinged maniac.

Greasy Greg Graf

This quoted Tweet is unavailable.



**Dustin Hurst** @HurstforIdaho · 16 Dec 21  
Greasy Greg Graf



**Dustin Hurst** @HurstforIdaho · 11 Dec 21  
Mike Satz.....Emily Walton.....Greg Graf.....Jane Gordon.....pretty accurate. All nasty, miserable people who readily share their misery.

**Dr. Debra Soh** @DrDebra... · 11 Dec 21  
People on the extreme-left always so miserable,



Exhibit D

DH-0088

3:06

🔍 📧 📧



from:@HurstforIdaho graf

🔍 📧 📧

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**Dustin Hurst** @HurstforIdaho · 01 Dec 21

Replying to @gsgraf

Ok. Have a good day, **Graf**. You are completely unhinged.

🗨️ 🔄 ❤️ 📊 🔗



**Dustin Hurst** @HurstforIdaho · 01 Dec 21

#JussieSmollett and Greg **Graf** are the same person. These dudes will say anything to be the victim. I mean, **Graf** literally concocted some bogus story to try to get Christensen fired and now **Graf** plays victim in the whole affair.

🗨️ 🔄 ❤️ 📊 🔗



**Dustin Hurst** @HurstforIdaho · 30 Nov 21

Two possible answers:

1. I want to show **Graf** how to win. He's not well-versed in that.
2. Totally forgot to remove this hack from our main list.

Maybe it's both. Either way, it makes for good entertainment. I love watching Greasy **Graf** get triggered over the smallest things.

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🗨️ 1 🔄 ❤️ 📊



**Dustin Hurst** @HurstforIdaho · 30 Nov 21

**Graf** put these notes like he doesn't know

🗨️ 🔄 ❤️ 📊

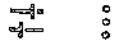
Exhibit D

DH-0089

3:06



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 01 Dec 21

Replying to @gsgraf

Ok. Have a good day, **Graf**. You are completely unhinged.



**Dustin Hurst** @HurstforIdaho · 01 Dec 21

#JussieSmollett and Greg **Graf** are the same person. These dudes will say anything to be the victim. I mean, **Graf** literally concocted some bogus story to try to get Christensen fired and now **Graf** plays victim in the whole affair.



**Dustin Hurst** @HurstforIdaho · 30 Nov 21

Two possible answers:

1. I want to show **Graf** how to win. He's not well-versed in that.
2. Totally forgot to remove this hack from our main list.

Maybe it's both. Either way, it makes for good entertainment. I love watching Greasy **Graf** get triggered over the smallest things.

This quoted Tweet is unavailable.



**Dustin Hurst** @HurstforIdaho · 30 Nov 21

Confout there acting like he doesn't know

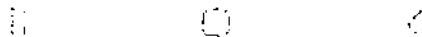




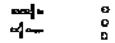
Exhibit D

DH-0090

3:06



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 30 Nov 21  
Graf out there acting like he doesn't know how fundraising works. What a moron.

This quoted Tweet is unavailable.



**Dustin Hurst** @HurstforIdaho · 19 Sep 21  
Greg Graf is a silly, unserious person.



**Dustin Hurst** @HurstforIda... · 05 Nov 20  
It looks as though Greg Graf has deleted his LinkedIn profile.

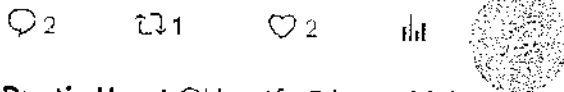
Or, maybe he blocked me somehow. Who knows?

Read into this development what you will. I have no clue what to make of it.

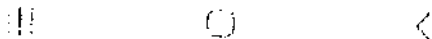


**Dustin Hurst** @HurstforIdaho · 13 Oct 20  
And now Graf is triggered again.

Of course, that happens on every day that ends in Y.



**Dustin Hurst** @HurstforIda... · 28 Sep 20



DH-0091

3:07



from:@HurstforIdaho graf



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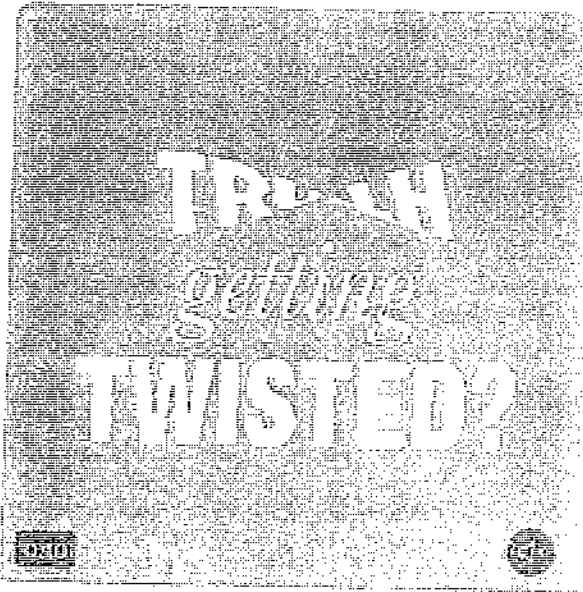


Dustin Hurst @HurstforIda... · 28 Sep 20  
Graf knows nothing and can't tell the truth.  
Not worth your time.



The Free Press @TheFP  
We don't let ideology stand in the way of the truth.

Join The Free Press today.



thefp.com  
Join The Free Press Today

48 107 587 1.3K

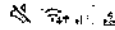
Promoted



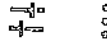
Exhibit D

DH-0092

3:07



← from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIda... · 25 Aug 20  
Replying to @gsgraf and @DanielWinlander  
Shut up, **Graf**. Be helpful or keep your mouth shut. You're nothing more than a narcissistic bully.



**Dustin Hurst** @HurstforIdaho · 10 Jun 20  
Replying to @gsgraf  
Be quiet, **Graf**.



**Dustin Hurst** @HurstforIdaho · 19 Apr 20  
Replying to @MattPrehm and @247Sports  
Yo. Typo in this **graf**:

McClendon replaces Jovon Bouknight who mutually agreed to part ways with the Ducks in early March after just on practice of Spring camp. Bouknight was with the Ducks for just one season after replacing Michael Johnson in 2019.



**Dustin Hurst** @HurstforIdaho · 24 Feb 20  
Replying to @tylerhurstID  
Sad that you are loving unhinged **Graf**.

And you know better than this. Ron d that.

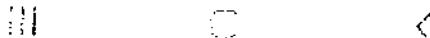


Exhibit D

DH-0093

3:07

🔍 📧 📌

← from:@HurstforIdaho graf

🔍 📧 📌

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Dustin Hurst @HurstforIdaho · 24 Feb 20

Replying to @tylerhurstID

Sad that you are loving unhinged Graf.

And you know better than this. Ron didn't say that.

🗨️ 2 ↻ 📌 ❤️ 📺 🔊



The Players' Tribune @PlayersTribune

.@TobinHeath is determined to reimagine the way women are seen and experienced in sports through @re\_inc.

In partnership with @QuickBooks.  
#BackWomenOwned #SmallBizSuccess



🗨️ 5 ↻ 164 ❤️ 843 📺 526K 🔊

📌 Promoted



Dustin Hurst @HurstforIdaho · 13 Feb

Graf is out of his mind. I have no idea going on with that guy. He needs help though.

🗨️ 📺 🔊

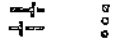
Exhibit D

DH-0094

3:07



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 13 Feb 20  
Graf is out of his mind. I have no idea what's going on with that guy. He needs help though.



**Dustin Hurst** @HurstforIdaho · 13 Feb 20  
First time Ive ever been called a Nazi. Big surprise it comes from Graf, who is completely obsessed with me.

 @gsgraf

Replying to @DustintheFree and @clarkcorbin

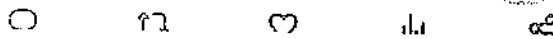
Grammar nazi or just regular nazi? It's hard to tell with Dustin sometimes.

11:55 AM · 12 Feb 20 · Twitter for iPhone

3 Likes

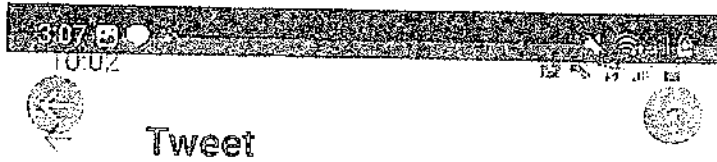


**Dustin Hurst** @DustintheFree · 2s  
Replying to @gsgraf and @clarkcorbin  
Ah. Obsessed Graf is back!



DH-0094

DH-0095



Tweet



**Gregory Graf**  
@gsgraf

Replying to @DustintheFree and @clarkcorbin

Grammar nazi or just regular nazi? It's hard to tell with Dustin sometimes.

11:55 AM · 12 Feb 20 · Twitter for iPhone

3 Likes



**Dustin Hurst @DustintheFree** · 2s  
Replying to @gsgraf and @clarkcorbin  
Ah. Obsessed Graf is back!



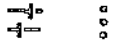
DH-0095

DH-0096

3:07



from:@HurstforIdaho graf



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**Dustin Hurst** @HurstforIdaho · 13 Feb 20

Replying to @gsgraf and @clarkcorbin

Ok, Graf. Whatever.



**Dustin Hurst** @HurstforIdaho · 12 Feb 20

Replying to @gsgraf and @clarkcorbin

Ah. Obsessed Graf is back!



**Adweek** @Adweek

Strategize new ways to engage with your customers, promote DEI in your campaigns and drive business growth at Adweek's Commerceweek, July 11-12.

