

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA  
CIVIL DIVISION**

Michael T. Flynn,  
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson,  
Defendant.

\_\_\_\_\_ /

**DEFENDANT JIM STEWARTSON'S NOTICE OF FILING PLAINTIFF'S DEPOSITION  
TRANSCRIPT**

Defendant, JIM STEWARTSON, by and through undersigned counsel, hereby gives Notice of Filing the transcript from the deposition of Plaintiff, MICHAEL T. FLYNN, taken on September 29, 2025.

The transcript is redacted pursuant to the Court's Order Finalizing Order Granting in Part Motion for Protective Order [DIN # 238, dated October 27, 2025].

Dated: February 15, 2026

/s/ George A.D. Thurlow  
George A.D. Thurlow, Esquire  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing document was served upon Stephen French, Esquire and Jared Roberts, Esquire via Florida E-Filing Portal on this 15<sup>th</sup> day of February, 2026.

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1 IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
2 IN AND FOR SARASOTA COUNTY, FLORIDA  
3 CIVIL DIVISION  
4 CASE NO.: 2023 CA 004264 NC

5  
6 MICHAEL T. FLYNN,  
7 Plaintiff

8  
9 VS.

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11 JIM STEWARTSON,  
12 Defendant

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19

20 DEPONENT: MICHAEL T. FLYNN  
21 DATE: SEPTEMBER 29, 2025  
22 REPORTER: ZOEY RITCHIE

23  
24  
25

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STIPULATION

The deposition of MICHAEL T. FLYNN was taken at MILESTONE REPORTING COMPANY, 315 EAST ROBINSON STREET, SUITE 510, ORLANDO, FLORIDA 32801, via videoconference in which all participants attended remotely, on MONDAY the 29TH day of SEPTEMBER 2025 at 10:01 a.m. (ET); said deposition was taken pursuant to the FLORIDA Rule of Civil Procedure 1.310(b) (5) It is agreed that ZOEY RITCHIE, being a Notary Public and Court Reporter for the State of FLORIDA, may swear the witness and that the reading and signing of the completed transcript by the witness is not waived.



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## PROCEEDINGS

THE VIDEOGRAPHER: We are on the record. My name is Audrey Smith. I'm the video technician, and Zoey Ritchie is the court reporter, representing Milestone Reporting Landmark Center, 1315 East Robinson, suite or Street, Suite 510, Orlando, Florida 32801. Today is the 29th day of September 2025. The time is 10:01 a.m.

The -- or we are convened by videoconference to take the deposition of Michael T. Flynn in the matter of Michael T. Flynn v. James Stewartson, case number 2023 CA 004264 NC in the Circuit Court of the 12th Judicial Circuit in and for Sarasota County, Florida, Civil Division.

In accordance with Civil Rule 30, I am required to state my name and business address, the date, time and location of the deposition and the witness's name after every break. Would we like to waive that requirement today?

MR. THURLOW: I'm fine waiving that.

THE VIDEOGRAPHER: Okay. Thank you.

And will everyone but the witness please state your appearance, how are you attending, and the location you're attending from, starting with Plaintiff's Counsel?



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1 MR. THURLOW: Yes. My name is George Thurlow.  
2 I'm with the law firm of Rahdert and Mortimer, PLLC,  
3 attending from our offices at 535 Central Avenue,  
4 Saint Petersburg, Florida. Mr. Whisenhunt is also a  
5 counsel on behalf of the plaintiff. He will  
6 announce his presence once he is on. He is wrapping  
7 up another hearing at this time.

8 MR. FRENCH: This is Stephen French with the  
9 Binnall Law Group on behalf of the plaintiff. With  
10 me is Jared Roberts also with the law firm of  
11 Binnall Law Group. We are here in Sarasota County  
12 for this deposition that is being conducted pursuant  
13 to the Court's protective order.

14 And I would like everybody to confirm that  
15 there are no links or anybody else that is able to  
16 join in on this deposition during its process.

17 THE VIDEOGRAPHER: We have a waiting room, so  
18 it should be secure.

19 MR. FRENCH: Okay.

20 THE VIDEOGRAPHER: Okay. And the court  
21 reporter will now swear in the witness.

22 THE REPORTER: The witness was -- or the  
23 witness' ID was confirmed off the record.

24 Mr. Flynn, could you please raise your right  
25 hand for me.



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1 Do you solemnly swear or affirm that the  
2 testimony you're about to give will be the truth,  
3 the whole truth, and nothing but the truth?

4 THE WITNESS: I do.

5 THE REPORTER: Thank you so much. You may  
6 begin.

7 DIRECT EXAMINATION

8 BY MR. THURLOW:

9 Q. Yes. May you please state your name for the  
10 record?

11 A. Michael Thomas Flynn.

12 Q. And how do you like to be addressed?

13 A. General Flynn or Mr. Flynn's fine.

14 Q. All right. Thank you. And have you ever had  
15 your deposition taken before?

16 A. Have I ever had a deposition taken before?

17 Q. Yes.

18 A. I have.

19 Q. How many times have you had your deposition  
20 taken before?

21 A. More than once. I mean, I don't recall as  
22 many -- I don't recall the number of times. Not -- not  
23 that many, but a -- a couple of times.

24 Q. Okay. So I won't -- don't want to bore you  
25 too much with the details of a deposition, but we're



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1 here for a deposition for the purposes of discovery as  
2 well as use at trial.

3 I'll be asking you a series of questions.  
4 You'll have to answer the questions as though you're in  
5 a court of law under oath and telling the truth. If  
6 your attorneys object to a question I ask, there are a  
7 number of recognized objections. They'll state their  
8 objection on the record. We'll proceed from there.

9 Your attorneys have questions at the end to  
10 wrap up. Any questions I ask you to clarify things,  
11 they have the right to ask those questions. Do you  
12 understand how we're going to proceed today?

13 A. I do.

14 Q. All right and General Flynn, what do you do  
15 for a living?

16 A. I am retired from the military, and I provide  
17 some consulting and advising services.

18 Q. And in what year did you retire from the  
19 military?

20 A. 2014.

21 Q. And what were the circumstances regarding your  
22 retirement from the military?

23 MR. FRENCH: Object to form.

24 THE WITNESS: Yeah. I mean, I -- I'm -- I'm  
25 not sure what I what -- what are you talking about?



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1 What are my circumstances?

2 BY MR. THURLOW:

3 Q. What role did you hold when you retired from  
4 the military?

5 A. I was a Lieutenant General from -- in the  
6 United States Army.

7 Q. And am I correct you were also director of the  
8 Defense Intelligence Agency at one point?

9 A. That's right.

10 Q. And was that during your time in the military  
11 or after?

12 A. That was during. That was my last or my final  
13 assignment in the -- in the military.

14 Q. And can you describe what that position  
15 entails?

16 A. I was the senior military intelligence officer  
17 for the Department of Defense and director of -- of one  
18 of the, you know, of a large intelligence agency in the  
19 United States government. Approximately 20,000 people  
20 assigned roughly.

21 Q. All right. And since you retired from the  
22 military, have you been consistently employed providing  
23 consulting and advising services?

24 A. Not consistently, but I have been -- when --  
25 when I am working, I usually work as a consultant or



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1 advisor. And -- and of course, at times, I have also  
2 done some speaking.

3 Q. All right. And let me try to just sort of go  
4 through. So you retired from the military in 2014. What  
5 did you do immediately upon your retirement from the  
6 military professionally?

7 A. Took a long vacation.

8 Q. That's understandable. Well, once you  
9 finished up your vacation, what was your professional  
10 role?

11 A. I -- I, you know, was doing some consulting  
12 and advising.

13 Q. What types of clients do you have in your  
14 consulting or advising businesses?

15 A. Private and -- and public organizations.

16 Q. By public organizations do you mean government  
17 agencies or not-for-profits?

18 A. Mainly not-for-profit and mainly private  
19 actually, not -- not -- not too many -- like I don't  
20 even recall if I had any -- any government but have to  
21 go back and look.

22 Q. And over -- is it fair to say that for the  
23 past decade or so you've done consulting, advising, and  
24 speaking?

25 A. Over the past decade, yes, I have.



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1 Q. And over the past decade, have you held any  
2 positions in government?

3 A. I was the National Security Advisor for the  
4 45th President of the United States.

5 Q. And besides that, have you held any positions  
6 in government, whether paid or unpaid?

7 A. I -- I also am currently on the West Point  
8 Advisory Board as of about, I don't know, April, I  
9 think.

10 Q. And would you consider it an honor to have  
11 been appointed to the West Point Advisory Board?

12 A. Yes.

13 Q. And what does your role on the West Point  
14 Advisory Board entail?

15 A. Provide advisory services to the -- to the --  
16 to what, you know, U.S. Military Academy Leadership, to  
17 the Department of Defense, and to the President of the  
18 United States.

19 Q. And who appointed you to the West Point  
20 Advisory Board?

21 A. The current President of the United States.

22 Q. Did you have to be confirmed by anybody to  
23 serve on the West Point Advisory Board?

24 A. No.

25 Q. So it was a presidential appointment, no



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1 congressional or other approval necessary, correct?

2 A. Correct.

3 Q. And when the president was deciding to appoint  
4 you to the West Point Advisory role, did the tweets of  
5 Jim Stewartson ever come up?

6 MR. FRENCH: Object to form.

7 BY MR. THURLOW:

8 Q. Did Jim Stewartson tweets ever come up when  
9 the president was considering appointing you to the West  
10 Point Advisory Board?

11 MR. FRENCH: Object to form. George, are you  
12 asking about, I mean, what other people looked at?

13 BY MR. THURLOW:

14 Q. Okay. To the best of your knowledge, did you  
15 -- did anyone, when you were being appointed to the West  
16 Point Advisory Board discuss the tweets of Jim  
17 Stewartson with you?

18 A. I mean, which ones?

19 Q. Any?

20 A. Not -- not that I recall, no.

21 Q. So would it be fair to say that the tweets of  
22 Jim Stewartson did not affect your ability to be  
23 appointed to the West Point Advisory Board?

24 MR. FRENCH: Object to form.

25 THE WITNESS: Yeah. I -- I don't know. I



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1 don't know if they did or not. I don't know if that  
2 was brought into the decision making process or not.

3 BY MR. THURLOW:

4 Q. And do you serve on any non-profit boards of  
5 directors?

6 A. I do.

7 Q. What organizations?

8 A. America's Future and the other is Gold  
9 Institute for International Studies.

10 Q. Can you tell me about the mission of America's  
11 Future?

12 A. Our -- our overarching mission is -- is we are  
13 a pro -- pro constitutional nonprofit and our principal  
14 focus is protecting children and really going after the  
15 scourge of child sex trafficking and slave trafficking.  
16 That's one of the things that we do.

17 Q. Okay. And you stated the name of another  
18 organization. Can you repeat the name of that other  
19 organization you serve on the board? I'm not sure I  
20 quite caught it.

21 A. Gold Institute for International Studies. And  
22 their principal mission is to create forums for  
23 discussions between international partnerships and the  
24 United States of America. And -- and it's, you know,  
25 it's a think tank, essentially a think tank based out of



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1 Washington, DC.

2 Q. And are you compensated for serving on either  
3 of these boards of directors?

4 A. I am for America's Future.

5 Q. All right. And how long have you served on  
6 America's Future's board of directors?

7 A. Since about April, I think April of 2021.

8 Q. And when was America's Future founded?

9 A. 1946.

10 Q. And during your service on America's Future's  
11 board of directors, has there been any issues with your  
12 role in the organization as it pertains to Mr.  
13 Stewartson's tweets?

14 MR. FRENCH: Object to form.

15 THE WITNESS: There -- there actually have, I  
16 mean, we have had conversations amongst the members  
17 of the board of directors and others, but there --  
18 there -- so his -- his vitriol has come up.

19 BY MR. THURLOW:

20 Q. And what's the nature of those conversations  
21 been?

22 A. Just people just can't believe that this guy  
23 is out there saying these kinds of things.

24 Q. Has anyone ever --

25 A. And -- and -- and I'd add and -- and I'd add,



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1 and how dangerous they are to not just to me, but to  
2 members of our organization, because we're a very public  
3 organization.

4 Q. And has anyone ever discussed removing you  
5 from your position with America's Future over Mr.  
6 Stewartson's tweets?

7 A. No.

8 Q. And this is a question I always hate to ask,  
9 but is there any reason such as a medical reason or  
10 medication you're on that you cannot provide complete  
11 and accurate testimony today?

12 A. You are going to have to explain your  
13 question. I mean, I don't even what you're asking.

14 Q. Are you under the influence of any medications  
15 or substances that would affect your ability to testify  
16 today?

17 A. No.

18 Q. And are you suffering any health conditions  
19 that would affect your ability to testify today?

20 A. No. Nope.

21 Q. And how frequently do you appear in the  
22 national media?

23 MR. FRENCH: Object to form.

24 THE WITNESS: Weekly. I mean, national media,  
25 you have to -- you have to define it, but I would



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1 say if you're talking about a -- a large media  
2 platform, usually about weekly.

3 BY MR. THURLOW:

4 Q. And what are the nature of when you're covered  
5 by, and I am talking about a large media outlet, say  
6 examples would be CNN, the New York Times, those sorts  
7 of outlets, when they discuss your name or cover you,  
8 what is tends to be the subject matter of the articles?

9 MR. FRENCH: Object to form. It and I'm not  
10 sure -- you're defining a -- you're defining what  
11 you believe to be the large media. You know, in  
12 this day and age of the computer, I mean, you have  
13 probably more followers where somebody has on -- has  
14 a webpage than the New York Times. So if you're  
15 asking about those specific ones, then that's fine.  
16 But we just want to be clear about that.

17 BY MR. THURLOW:

18 Q. Okay. So over the course of the last ten  
19 years, how often has your name appeared in the New York  
20 Times?

21 MR. FRENCH: Object to form.

22 THE WITNESS: Yeah. I mean, that's, I mean,  
23 talk about a general question. Jeez.

24 BY MR. THURLOW:

25 Q. Do you know if your name has ever appeared in



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1 the New York Times over the course of the last ten  
2 years?

3 A. I do, yes. I do know that it's appeared.

4 Q. And under what circumstances, do you know that  
5 your name has appeared in the New York Times?

6 MR. FRENCH: Object to form.

7 THE WITNESS: I mean, you'd have to really be  
8 more specific. I mean, under what circumstances,  
9 what does that mean?

10 BY MR. THURLOW:

11 Q. When the New York Times has written articles  
12 about you, the articles that you know about, what was  
13 the subject matter of those articles that you know  
14 about?

15 MR. FRENCH: Object to form.

16 THE WITNESS: Yeah. I'm not -- I'm not really  
17 sure. I'm -- I'm not really sure what you're  
18 asking.

19 BY MR. THURLOW:

20 Q. I think I -- it's pretty clear. When the New  
21 York Times has written an article about you, an article  
22 that you know about, what has the subject matter of that  
23 article been?

24 MR. FRENCH: Object to form. And George, I  
25 know -- I think I know where you're going, but I



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1 mean, if there -- we can only guess at the number of  
2 times there have been articles about General Flynn.  
3 Are you asking 20 percent of the time it's about  
4 this issue, 40 percent of the time it's about  
5 another issue and then he's supposed to identify  
6 what those issues are and what percentage? You see  
7 the difficulty in trying to respond to that  
8 question?

9 MR. THURLOW: Yes. I'm asking specifically  
10 about the articles he knows about.

11 MR. FRENCH: Okay. Well, that again, what he  
12 knows about and what he may have studied and has,  
13 you know, so forth. It is a very -- if he has even  
14 studied anything from the New York Times. So it's  
15 -- I -- I'm not sure what you're -- what you're  
16 asking here.

17 BY MR. THURLOW:

18 Q. Yeah. We'll preserve on that question. Going  
19 on. Do you know if your name has ever been mentioned on  
20 CNN?

21 A. I do.

22 Q. Do you know how frequently your name has been  
23 mentioned on CNN?

24 A. I don't.

25 Q. When your name has been mentioned on CNN,



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1 would you consider it typically positive or negative?

2 MR. FRENCH: Again, object to form.

3 THE WITNESS: I mean, I think it's -- it  
4 depends on the circumstance. Depending on the  
5 context.

6 BY MR. THURLOW:

7 Q. Has CNN ever covered a story where you have  
8 been covered negatively?

9 MR. FRENCH: Object to form. Negative in whose  
10 perspective?

11 MR. THURLOW: Negative in the eyes of a  
12 reasonable person.

13 MR. FRENCH: All right. And who is that? And  
14 is that person going to be testifying?

15 MR. THURLOW: We'll preserve on that.

16 BY MR. THURLOW:

17 Q. I'm going to share my screen and mark this as  
18 Exhibit 1. Give me one moment. This is the amended  
19 notice of taking Zoom deposition duces tecum.

20 General Flynn, pursuant to this notice of  
21 taking deposition, you are required to bring with you  
22 certain documents. Did you bring with you all documents  
23 and exhibits you tend intend to introduce at trial?

24 (Exhibit 1 was marked for identification.)

25 A. Am I going to be able to read that? And what



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1 does that say?

2 MR. FRENCH: It just says all documents and  
3 exhibits you intend to introduce at trial. If you  
4 know.

5 THE WITNESS: -- following document, all  
6 documents you intend to introduce a trial. Upon the  
7 -- support and allegation that you have suffered  
8 financial losses.

9 MR. FRENCH: Yeah. Focus on number 1 right  
10 now.

11 THE WITNESS: Yeah. I mean, all documents  
12 intended. Yeah. I mean, I so, yeah, whatever I'm  
13 required to bring. Sure. Yes.

14 BY MR. THURLOW:

15 Q. You have those documents with you today?

16 A. I have some, yeah.

17 Q. Please have your attorney e-mail those over to  
18 me.

19 Going on to the next item. "All documents  
20 which you rely upon to support your allegation that you  
21 have suffered financial losses as a result of Defendant  
22 Jim Stewartson." Do you have those documents?

23 A. I have documents that I've I have provided to  
24 my attorney.

25 Q. We will need to see those documents as part of



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1 this deposition. We'll reserve on any questions that  
2 pertain to those documents. Do you have any documents  
3 that support your allegation that you have suffered  
4 mental anguish as a result of Defendant Jim Stewartson?

5 A. I don't have those documents today.

6 Q. Are there any documents that support your  
7 allegations that you have suffered mental anguish as a  
8 result of Defendant Jim Stewartson?

9 A. I do not have any documents that show that  
10 today.

11 Q. Do you have any documents whatsoever that show  
12 that?

13 A. I -- I likely will, yes.

14 Q. What are those documents?

15 A. I don't know off the top of my head.

16 Q. We'll need to see those, and we reserve on  
17 those questions until we see those documents.

18 Do you have any documents with you today that  
19 support your allegation that you have suffered  
20 humiliation as a result of Defendant Jim Stewartson?

21 A. Not with me today.

22 Q. Do those documents exist?

23 A. I do believe they do.

24 Q. Do you know what those documents are?

25 MR. FRENCH: Object to form on that.



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1 THE WITNESS: Yeah, off the top of my head, I  
2 don't. No.

3 BY MR. THURLOW:

4 Q. We'll reserve any questions as it pertains to  
5 that subject matter until we see those documents.

6 And then I'll -- do you have any documents  
7 that support your allegation that you have suffered  
8 damage to your reputation as a result of Defendant Jim  
9 Stewartson?

10 A. I do believe I -- I have documents that can  
11 show that.

12 Q. Have you provided those to your attorney for  
13 today's deposition?

14 A. I have not.

15 Q. We will need to see those documents. Do you  
16 understand that you were required to bring these  
17 documents with you to today's deposition?

18 MR. FRENCH: And I'll say you're also not  
19 including what has already been provided as far as  
20 what is attached to the amended complaint.

21 THE WITNESS: Yeah.

22 MR. FRENCH: You know, all those documents are  
23 included in there and how they're characterized and  
24 whether they are considered along with others that  
25 have already been part of this litigation could



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1 signify as well as accomplish in response to each of  
2 those items.

3 MR. THURLOW: I don't believe so. I don't  
4 recall anything that was a statement of your  
5 client's that had anything to do with any of these  
6 requests in the complaint, but we'll move on, and  
7 we'll reserve the right to ask questions on these.

8 MR. FRENCH: That's fine. We can all read  
9 what's in the pleadings.

10 MR. THURLOW: -- be brought here today.

11 MR. FRENCH: We can all read what's in the  
12 pleadings. That's fine.

13 MR. THURLOW: So going on to the pleadings, I'm  
14 going to mark this as Exhibit 2, which is the second  
15 amended complaint, which is a 60-page document.

16 (Exhibit 2 was marked for identification.)

17 BY MR. THURLOW:

18 Q. General Flynn. Are you familiar with the  
19 second amended complaint?

20 A. I -- I believe I am.

21 Q. And let me just zoom in to make it easier to  
22 read. And for the sake of reference, I'm going to be  
23 referencing certain paragraphs in here, because it's a  
24 long document just to know where we're talking about.  
25 And that's -- I'm going to start with Paragraph 2.



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1           What basis do you have to say that Mr.  
2 Stewartson sought fame through the trend of defaming  
3 prominent conservative figures?

4           A.    Don't highlight it, if you don't mind because  
5 it's harder to read it here.  Yeah.  It's easier when  
6 you don't highlight it.  And the defaming prominent  
7 conservative figures.  Now, ask your question.

8           Q.    What factual basis do you have to assert that?

9           A.    I think it is just through -- through the  
10 constant vitriol that he spews almost on a daily basis  
11 directly attacking me.

12          Q.    How do you know that Mr. Stewartson is seeking  
13 fame?

14               MR. FRENCH:  Object to form.

15               THE WITNESS:  How is what?

16               BY MR. THURLOW:

17          Q.    How do you know that Mr. Stewartson is seeking  
18 fame?

19               MR. FRENCH:  Object to form.

20               THE WITNESS:  Yeah.  I don't know whether he is  
21 seeking fame or not, but he obviously gets it.

22               BY MR. THURLOW:

23          Q.    How do you know that Mr. Stewartson has  
24 received fame?

25               MR. FRENCH:  Object to form.



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1 THE WITNESS: I -- I know I think part of it is  
2 -- is, you know, somebody who's -- who's in the  
3 world of social media and they increase their  
4 follower base. That's for sure.

5 BY MR. THURLOW:

6 Q. Do you consider Mr. Stewartson to be a famous  
7 person?

8 MR. FRENCH: Object to form.

9 THE WITNESS: I don't know about famous, but  
10 certainly infamous. His name comes up in enough --  
11 in enough conversations with people that I'm around  
12 on a, you know, on a fairly routine basis.

13 BY MR. THURLOW:

14 Q. Approximately how many times does Mr.  
15 Stewartson's name come up in conversations with?

16 A. Whenever he -- whenever he posts, some --  
17 some, you know, hate -- hate or vitriol against me.  
18 Somebody will -- somebody will typically send it to me  
19 and say can you delete this guy?

20 Q. Who sent it to you?

21 A. Huh?

22 Q. Who sends Mr. Stewartson's content to you?

23 A. Different people that I know.

24 Q. Can you identify any of them on the record?

25 A. Members of my nonprofits, people that work for



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1 me, people that know me. So I don't know about, you  
2 know, any names, but certainly, you know, it's the  
3 typical, can you believe this guy, when they -- and  
4 they'll send me a -- a -- a -- one of his posts.

5 And it's just a constant barrage of -- of  
6 things that, you know, I -- I just -- I wonder why he  
7 does it. I mean, that's my -- my thing is just, you  
8 know, why is this guy doing this? What did I -- what  
9 did I ever do to him?

10 Q. Do the people who send Mr. Stewartson's tweets  
11 to you believe them?

12 A. I don't know whether they believe them or not.  
13 I don't. I can't say that. I don't -- I don't know  
14 what's in their mind other than sending it to me.

15 Q. And going on to Paragraph 5, what information  
16 do you have to support your allegation that "Stewartson  
17 chooses to defame conservatives in an effort to make a  
18 comfortable living for himself"?

19 A. Ask your question again.

20 Q. What information do you have to support your  
21 allegation that "Stewartson chooses to defame  
22 conservatives in an effort to make a comfortable living  
23 for himself"?

24 A. I think you'd have to define comfortable  
25 living, but he definitely continues to do it. So there



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1 must be some motivation behind why he does it.

2 Q. Do you know what you meant when you or your  
3 attorneys chose the words comfortable living?

4 MR. FRENCH: Object to form.

5 THE WITNESS: Yeah. I, you know, you'd have to  
6 ask, you know, you can address it with the  
7 attorneys, but I mean, you'd have to define that.

8 BY MR. THURLOW:

9 Q. What would you consider to be a comfortable  
10 living?

11 MR. FRENCH: Object to form.

12 THE WITNESS: Being left alone by from -- from  
13 the vitriol of people like Stewartson, who just is  
14 constantly attacking me with, just, what is the  
15 worst type of -- of speech, I guess.

16 And it -- and it's very hurtful and it's not  
17 just to me, but to my family and friends, people I  
18 work with. And so, you know, I -- I just don't  
19 understand. And again, I, you know, I don't -- I  
20 don't know why. I -- I don't understand why.

21 BY MR. THURLOW:

22 Q. Okay. On to Paragraph 15. What amount of  
23 damages are you alleging that Mr. Stewartson has caused  
24 you?

25 A. Paragraph 15.



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1 MR. FRENCH: And I'll object to the extent that  
2 your answer is going to be based upon discussions  
3 you've had with counsel as to what is the intent of  
4 litigation strategy for damages in this case.

5 THE WITNESS: And I -- and I would just add  
6 that, you know, there's a damage and it's called  
7 mental anguish damage, and it's not just to me, but  
8 it's also members of my family who have been through  
9 a -- a significant emotional period of time during  
10 these last ten years that you have highlighted. And  
11 for no reason at all, other than the fact of my  
12 standing up for a particular, you know, candidate  
13 and now president.

14 So I -- I -- so the -- so the -- the mental,  
15 emotional, and physical to a degree is really a big  
16 part of this and -- and, you know, and I want it --  
17 I want it to stop.

18 BY MR. THURLOW:

19 Q. Can you describe the mental anguish that you  
20 have suffered?

21 A. Yeah, it's arguments. It's -- it's feeling of  
22 like, what did I do to, you know, to deserve this from  
23 this guy who I -- who I don't even, you know, I have no  
24 idea who he even is, other than he's just this social  
25 media character.



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1           And he is -- obviously, his voice has grown in  
2 time because there's a lot of other people who are hard  
3 to see in this world of social media who become very,  
4 very dangerous when they hear people like him spewing  
5 hatred about a person like me.

6           And so, they may act out in different ways,  
7 like killing somebody. So my mental anguish is worrying  
8 about my life. My family worries about my life. My --  
9 my close friends worry about my life, and I don't -- and  
10 I don't say that lightly, because of the type of things  
11 that this person says, whether he would do it himself or  
12 it would cause others to do, and that's mental anguish.  
13 So I'm going through mental anguish right now with you.

14           Q.    And have you ever cried as a result of  
15 anything that Defendant Stewartson has said about you?

16           A.    Has he what?

17           Q.    Have you ever cried?

18           A.    Have I ever cried about anything? No, I -- I  
19 don't know whether I've cried about it. I mean, I've  
20 whined about it. I've certainly argued about it. I  
21 have debated about it. I have -- I have -- I've -- I've  
22 had to -- I've discussed it with members of my family  
23 more than once.

24           Q.    And what have those discussions with members  
25 of your family entailed?



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1 A. How horrible of a person Jim Stewartson is,  
2 and how horrible of the kinds of things that he says  
3 are, and how dangerous they -- they are. And -- and  
4 frankly now, in the environment that we're in, it's even  
5 become more dangerous because we've seen the acting out  
6 by people who have been -- who have been basically --  
7 you know, on social media platforms have been brought to  
8 the level of -- of extreme violence.

9 Q. Do you have any knowledge of whether Mr.  
10 Stewartson intends to incite violence?

11 MR. FRENCH: Object to form.

12 THE WITNESS: I -- I don't off the top of my  
13 head. I'd have to go back through and look at every  
14 single one of his -- of his posts, but some of the  
15 ones that I am aware of are pretty bad.

16 BY MR. THURLOW:

17 Q. And you mentioned debate causing mental  
18 anguish. Did you voluntarily get involved in politics?

19 A. Yes.

20 Q. And would you consider debate to be a normal  
21 part of the political process?

22 A. I do.

23 Q. So wouldn't debate be a natural part of just  
24 being part of the political process?

25 A. Debating foreign policy or domestic policy is



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1 -- is -- is a -- you know, is a subject -- debating a  
2 constitutional issue is a good debate. Debating, you  
3 know, the idea that somebody is attacking you in a way  
4 that could become a danger to your -- to your person,  
5 that's another issue, and that's what I'm concerned  
6 about.

7 I'm concerned about, you know, my life, the  
8 life of my family, and the life of my friends that I  
9 have that are in various forums with me at times. And  
10 when I say my life, I'm talking about actually my -- you  
11 know, actually being killed.

12 So that's what I'm worried about. And guys  
13 like Stewartson, him in particular, causes that. So if  
14 I've had debates, it's been -- hadn't been debates about  
15 foreign policy. It's been debates about, you know, what  
16 -- have you been able to do anything about it? Is there  
17 anything to do about it?

18 And I've said, yeah, I'm -- I'm -- I'm going  
19 after this guy. I'm going after him legally, because  
20 I'm trying to get him to -- to understand that what he  
21 says is very, very dangerous to my physical being and my  
22 family's.

23 Q. Have you received any death threats as a  
24 result of Mr. Stewartson statements?

25 MR. FRENCH: Object to form.



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1 THE WITNESS: Yeah. I don't know. I don't  
2 know specifically off the top of my head. Don't  
3 recall.

4 BY MR. THURLOW:

5 Q. Have you received any death threats within the  
6 past five years?

7 A. Yes.

8 Q. How many?

9 A. Don't know off the top of my head.

10 Q. Was it more than one?

11 A. Yes.

12 Q. Was it more than ten?

13 A. No. No, I don't I don't know -- recall the  
14 numbers.

15 Q. Do you know who sent you these threats?

16 A. I don't.

17 Q. Do you know what these threats concerned?

18 A. My life, my family, my existence, my  
19 businesses. I've turned them over to law enforcement.  
20 So, you know, I've done -- done at least the most --  
21 most I can with what I've -- with the kinds of things  
22 that I've had to deal with.

23 Q. Do you know if law enforcement ever made any  
24 arrests as it pertains to these threats?

25 A. I don't know.



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1 Q. And are you aware that you pled a \$75,000  
2 maximum of damages in your original lawsuit?

3 A. I don't think it was quite that much, but it  
4 was around that number.

5 Q. Do you have any way to quantify the damages  
6 that you allege Mr. Stewartson has caused you?

7 MR. FRENCH: Again, I'm going to object to --  
8 on the basis -- if your information in answering  
9 that question comes from conversations with counsel  
10 in preparation for the trial. Otherwise, if you  
11 have an answer, you can answer that.

12 THE WITNESS: Yeah. I -- I -- I think it's  
13 hard to quantify, actually. I think it's hard to  
14 quantify, you know, the idea that you are placing  
15 somebody's life in danger by the kinds of vitriol  
16 that you decide to spew on these platforms, that --  
17 that aren't about specific issues, that are about  
18 you personally. Now, I'm talking about myself, so  
19 it's hard to quantify.

20 BY MR. THURLOW:

21 Q. And have you ever sought any psychological  
22 treatments as a result of Mr. Stewartson?

23 MR. FRENCH: Object to form.

24 THE WITNESS: Yeah. I'm not going to answer  
25 that, actually.



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1 BY MR. THURLOW:

2 Q. You've pled mental anguish in your complaint.  
3 I believe it's highly relevant whether you've sought  
4 psychological treatment.

5 MR. FRENCH: It's a different issue.

6 THE WITNESS: Yeah. But I -- but do you  
7 consider -- do you consider a -- a -- a priest or  
8 pastor in that category?

9 BY MR. THURLOW:

10 Q. Have you discussed Mr. Stewartson's statements  
11 with a priest or pastor?

12 A. Not going to answer that. It's privileged.

13 Q. And as you may be aware in this lawsuit, you  
14 -- the second amended complaint originally alleged -- 14  
15 statements were alleged to be defamatory by Defendant  
16 Stewartson, and then the Court dismissed ten of the 14  
17 statements. How can you isolate your damages just to  
18 the four remaining statements?

19 MR. FRENCH: I'm going to object to form again,  
20 based upon any information you received in  
21 conversations with your Counsel as to how that is  
22 done or what the meaning of which statements  
23 survived and didn't survive dismissal. You know, if  
24 you have anything beyond the legal discussions  
25 you've had with counsel, you can answer.



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1 BY MR. THURLOW:

2 Q. Do you have an answer, General Flynn?

3 A. Say the question again.

4 Q. So as you're aware, ten of the 14 statements  
5 that were alleged to be defamatory that were statements  
6 of Mr. Stewartson have have been dismissed by the Court,  
7 and there are four statements that remain to this case.

8 How can you isolate your claim for damages to  
9 just the four remaining statements in the complaint?

10 MR. FRENCH: And the objection remains,  
11 instruction remains that any communication or  
12 information you were provided in discussion with  
13 counsel regarding damages and how or if possible to  
14 apportion between those dismissed statements as well  
15 as the ones that remain.

16 If you have anything beyond any of those  
17 discussions, you may answer. But if it's all with  
18 counsel, then I recommend and instruct you not to  
19 answer.

20 THE WITNESS: (No verbal response.)

21 MR. FRENCH: I think the silence means he is  
22 not answering.

23 BY MR. THURLOW:

24 Q. For the sake of the record, we, I think, need  
25 something more than silence.



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1 A. What's that?

2 MR. FRENCH: If you don't have any information  
3 on your own, other than what we have discussed in  
4 regard to damages and apportionment of damages  
5 between various statements made and allegations in  
6 the case, if that all comes from discussions with  
7 counsel, then your answer is, you don't have any.  
8 If you have anything beyond that, and you can answer  
9 as you wish.

10 THE WITNESS: Yeah. I mean, I -- I appreciate  
11 the -- the -- the -- the judge's judgment, but I  
12 don't have any other thing -- I don't have anything  
13 else to say.

14 BY MR. THURLOW:

15 Q. And where did you first access the four  
16 statements that are subject to the litigation?

17 MR. FRENCH: Object to form.

18 THE WITNESS: Yeah. I don't know what you're  
19 asking. What are you -- what are you asking there?

20 BY MR. THURLOW:

21 Q. Where geographically were you located when you  
22 first accessed the four statements of Mr. Stewartson  
23 that are subject to the litigation?

24 MR. FRENCH: Object to form.

25 THE WITNESS: No -- no idea. I mean, I don't



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1 -- what are you talking about? Like, where was,  
2 like, physically standing or sitting?

3 BY MR. THURLOW:

4 Q. Yes. In terms of county and state.

5 A. I'm a resident of Florida and the -- and the  
6 county of Sarasota.

7 Q. Did you access Mr. Stewartson materials for  
8 the first time in Sarasota County, Florida?

9 MR. FRENCH: Object to form.

10 THE WITNESS: I -- I don't -- I don't -- you  
11 know, where -- was I physically in Sarasota when I  
12 first read them. I mean, is that what you're  
13 asking?

14 BY MR. THURLOW:

15 Q. Yes, that's the question.

16 A. Yeah, I don't -- I don't know. I don't  
17 remember.

18 Q. And in Paragraph 19 of your complaint, you say  
19 that "General Flynn has become a staunch advocate for  
20 the preservation of American values and election  
21 integrity and the fight against human trafficking.  
22 General Flynn has recently began 'the America Project' a  
23 non-partisan social welfare organization, defending  
24 rights and freedoms, election integrity, and border  
25 security."



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1           So I'm going to ask you a few questions about  
2 this statement. Can you tell me about the America  
3 Project and what it is?

4           A. It was a nonprofit that was stood up in the  
5 winter of 2021 to -- basically to deal with those  
6 issues.

7           Q. And what do you mean by, "American values"?

8           A. What do I mean, by American values? The  
9 values of life, liberty, and the pursuit of happiness.

10          Q. And what do you mean by, "election integrity"?

11          A. Free and -- free and fair and transparent  
12 elections.

13          Q. And what do you mean by, "the fight against  
14 human trafficking"?

15          A. To do all -- to do as much as I can to expose,  
16 raise awareness, and -- and -- and actually to get  
17 involved in -- in legal -- legal actions for those that  
18 are involved in human trafficking, especially the  
19 trafficking and slavery of children.

20          Q. And is the America Project still operating?

21          A. I don't know. I don't -- I don't know. I  
22 don't know if it is.

23          Q. Were you personally involved in the America  
24 Project?

25          A. I was an advisor to the America Project, yes.



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1 Q. For what dates were you an advisor to the  
2 America Project?

3 A. Generally, in, you know, on or about, let's  
4 just say latter part of the winter of 2021 and off and  
5 on for -- 2022, 2023 -- probably until the summer of  
6 2023, roughly. And it's -- I have to go back and look.

7 Q. Does the America Project have any position on  
8 the First Amendment, and particularly freedom of speech?

9 MR. FRENCH: Object to form.

10 THE WITNESS: Yeah. I don't know -- I don't  
11 know what you're talking about or what you're  
12 asking.

13 BY MR. THURLOW:

14 Q. Does the first -- does the America's Project  
15 [sic] get involved with issues concerning free speech?

16 MR. FRENCH: Object to form.

17 THE WITNESS: Yeah. I -- I don't -- I don't  
18 recall, or I don't know. I -- I'm not quite sure  
19 exactly the -- all the issues that were -- that the  
20 America Project got involved in. I advised on some,  
21 not all.

22 BY MR. THURLOW:

23 Q. And did the America Project receive funding  
24 from donors?

25 A. I believe it did, yes.



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1 Q. Were you paid by the America Project?

2 A. I was.

3 Q. Are you alleging that Mr. Stewartson's tweets  
4 caused your paid position at the America Project to end?

5 A. I don't know.

6 Q. Do you have any evidence that supports that  
7 your position at the America Project ended because of  
8 Mr. Stewartson's tweets?

9 MR. FRENCH: Object to form.

10 THE WITNESS: I -- I -- you know, off the top  
11 of my head, I don't recall. I will tell you that --  
12 that the amount of times that I had to, you know,  
13 hear -- hear the kinds of stuff that he would spew  
14 -- it -- it -- it grows, it grows on you. It cause  
15 you to get weary. And are you in -- you know, and  
16 -- and the things that you're involved in. You  
17 know, does it -- does it, you know, it's like you  
18 get tired of it. You just -- you -- you can -- you  
19 can grow weary of it, believe me.

20 So I don't know whether that -- that caused me  
21 to -- to step down from it or not. But sitting here  
22 today, I don't -- I don't recall whether it did, but  
23 -- but I will tell you that it grows on you, and not  
24 in a positive way.

25 BY MR. THURLOW:



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1 Q. You voluntarily stepped down from the America  
2 Project?

3 A. I stepped down, yes. I voluntarily stepped  
4 down. Yep. Yep. Stepped away from it.

5 Q. And in Paragraph 22 of the complaint, you  
6 allege that Mr. Stewartson is digitally tracking your  
7 every move. What evidence do you have to support this  
8 allegation?

9 A. Well, he -- I don't know. Yeah. I mean, I --  
10 I guess in -- in one respect, he showed up to an event  
11 that we were having, and I, you know -- I mean -- so I  
12 don't -- I don't know. I -- you know, I don't know  
13 whether it was because he just wanted to -- he -- he  
14 definitely wasn't invited, and I'd have to go back -- I  
15 have to go back and look at all the different posts that  
16 he had. Maybe there was something that he said.

17 Q. What was the event that you had that Mr.  
18 Stewartson showed up at?

19 A. It was a showing of a -- a documentary at a  
20 private home.

21 Q. And was this event publicly disseminated?

22 A. It was.

23 Q. How many people attended this event?

24 A. Probably 100.

25 Q. Is it common for people who -- just random



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1 people to show up at these types of events?

2 MR. FRENCH: Object to form.

3 THE WITNESS: I mean, he -- he would've been  
4 invited if he had come in in a normal way, but he  
5 didn't. You're going to have to -- you're going to  
6 have to ask your client how he showed up at that  
7 particular event.

8 BY MR. THURLOW:

9 Q. How did my client show up to that event?

10 MR. FRENCH: Object to form.

11 THE WITNESS: I -- I -- yeah. I just recall a  
12 photo of him near the event in a military -- he  
13 appeared in some type of military jacket.

14 BY MR. THURLOW:

15 Q. Were you personally at that event?

16 A. Yes.

17 Q. Do you have any personal recollection of Mr.  
18 Stewartson at this event?

19 A. Yes, I do.

20 Q. Did Mr. Stewartson do or say anything at the  
21 event?

22 A. Not at the event, I don't believe. I'd have  
23 to go back and look, but, you know, we -- we -- my  
24 security certainly brought it to my attention.

25 Q. Did your security know who Mr. Stewartson was?



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[REDACTED]



4 And it's just -- you know, it's heartbreaking,  
5 to be honest with you, because it's like, God, why  
6 can't this guy just shut up?

7 BY MR. THURLOW:

8 Q. Do you have followers on Twitter or X?

9 A. Yes.

10 Q. Do you agree with everything that your  
11 followers post on their own Twitter or X page?

12 A. I don't.

13 Q. Do you think that all of Mr. Stewartson's  
14 followers agree with what he says?

15 A. I don't know what they think.

16 MR. FRENCH: Yeah. Object to form. The last  
17 one. I'm sorry.

18 THE WITNESS: Yeah. I mean, I don't know what  
19 they're thinking. Yeah. Yeah. That's the problem,  
20 though, George. That's the problem. That's the  
21 problem, is that -- you know, is that.

22 BY MR. THURLOW:

23 Q. Do you agree with everything that your  
24 followers post on X?

25 A. I do not.



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1 Q. Do you think Mr. Stewartson agrees with  
2 everything his followers post on X?

3 MR. FRENCH: Object to form.

4 THE WITNESS: I have no idea.

5 BY MR. THURLOW:

6 Q. Do you know what the Thinking Project is?

7 THE WITNESS: What?

8 MR. FRENCH: Thinking.

9 THE WITNESS: Huh?

10 MR. FRENCH: Thinking Project.

11 THE WITNESS: I don't.

12 BY MR. THURLOW:

13 Q. You have no personal knowledge about the  
14 Thinking Project?

15 MR. FRENCH: Object to form.

16 THE WITNESS: I don't spend -- I -- I don't. I  
17 mean, I really don't, you know. I mean, if you're  
18 -- if you're asking me, you know, personal  
19 knowledge, what -- I don't know what that means. Am  
20 I aware of it? I'm aware of it from this, from  
21 Stewartson, but that's it. I don't pay any attention  
22 to it.

23 BY MR. THURLOW:

24 Q. Do you know what the website Urban Dictionary  
25 is?



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1 A. What?

2 MR. FRENCH: Do you know what --

3 BY MR. THURLOW:

4 Q. Paragraph 31 of the complaint, you refer to  
5 the website Urban Dictionary. Do you know what the  
6 website Urban Dictionary is?

7 A. I don't know if I am. I -- you know, I don't  
8 recall. I -- I see a lot of things, and I read a lot,  
9 so -- so I -- I don't know. I mean, I -- I -- I -- I  
10 just don't know.

11 Q. And do you know what the Anti-Defamation  
12 League is?

13 A. I do.

14 Q. What is your understanding of the Anti-  
15 Defamation League?

16 A. They're a -- they are a progressive  
17 organization that gets involved in -- in various issues  
18 that deal with -- deal with, you know, I guess  
19 constitutional issues. And that's about -- that's about  
20 the extent of what I know. I mean, you know, without  
21 going into their website and figuring out what their --  
22 what their mission is.

23 Q. Do you believe that the Anti-Defamation League  
24 is a credible source of information?

25 A. Personally, I do not.



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1 Q. So I -- I'm going to turn to Paragraph 46 of  
2 the complaint, which is spread across two pages. I just  
3 -- let me zoom out a little bit just to --

4 A. Uh-huh.

5 Q. Do you have any information that Mr.  
6 Stewartson made the four of these remaining statements  
7 that are subject of the lawsuit for the purposes of  
8 financial gain?

9 MR. FRENCH: I object. George, I -- and maybe  
10 this is just more of logistics of how to work this.  
11 Maybe you can highlight the ones and ask questions  
12 about them, because it's -- it -- just for us  
13 looking across the room at the big screen, it's hard  
14 to tell which one you're talking about and  
15 everything else. So just trying to help get this  
16 moving.

17 MR. THURLOW: I understand that, so I'm asking  
18 specifically about this first sentence about  
19 Stewartson seeking publicity and financial gain for  
20 this whole list of statements.

21 MR. FRENCH: Right.

22 BY MR. THURLOW:

23 Q. Some of them have been stricken from the  
24 complaint. Some -- there are -- four of it are  
25 remaining. So --



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1 MR. FRENCH: Right.

2 BY MR. THURLOW:

3 Q. -- to the extent that there are four  
4 remaining --

5 MR. FRENCH: Right.

6 BY MR. THURLOW:

7 Q. -- do you have -- what information do you have  
8 that Stewartson has sought financial gain by making  
9 those statements?

10 MR. FRENCH: And this is a -- what you  
11 addressed in the opening part of the complaints?  
12 The same question about that?

13 MR. THURLOW: Fair enough.

14 MR. FRENCH: Just specific as to each one,  
15 whether he has -- as specific as opposed to the  
16 answer he had about the general? In -- generally, I  
17 should mean, not the general sitting next to me.

18 MR. THURLOW: All right. So let's go -- do it  
19 statement by statement. I agree that that's  
20 probably a good logistical way of trying to do this.  
21 So I --

22 MR. FRENCH: I'm just trying to avoid me having  
23 to say objection.

24 MR. THURLOW: I get it.

25 BY MR. THURLOW:



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1 Q. So Paragraph 58, let's see. Has anyone  
2 besides Mr. Stewartson ever called you a Nazi?

3 MR. FRENCH: Object to form.

4 THE WITNESS: I -- I don't recall. He  
5 definitely has.

6 BY MR. THURLOW:

7 Q. What is your understanding of what the term  
8 Nazi means today?

9 A. Today?

10 MR. FRENCH: Yeah. I -- in --

11 THE WITNESS: I mean, what is it --

12 MR. FRENCH: Yeah. Objection to that because I  
13 -- it -- are you saying what his understanding  
14 historically or today, what it gets used for, or  
15 what culturally or somebody else uses it for, or  
16 what your client intended it to mean?

17 BY MR. THURLOW:

18 Q. Let me rephrase. On the date of this tweet,  
19 September 1, 2021, what is your understanding of what  
20 Nazi means on that date?

21 A. Well, what Nazi means is National Socialism.

22 Q. Do you know if the Nazi party still exists?

23 MR. FRENCH: Object to form.

24 THE WITNESS: Yeah, I don't -- I -- I -- I do  
25 believe it exists. Yeah, I do believe that it still



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1 exists, some form or fashion.

2 BY MR. THURLOW:

3 Q. Do you know if the term Nazi is ever used  
4 hyperbolically?

5 A. I don't.

6 Q. How would you prove whether or not someone is  
7 a Nazi?

8 MR. FRENCH: I object to form. I -- and again,  
9 I'm -- I -- I'm sorry, George, but you're asking him  
10 what he would have to undertake to prove if somebody  
11 was or was not a Nazi in somebody's own perception  
12 in his -- in a court or public opinion or what?

13 BY MR. THURLOW:

14 Q. Let me rephrase the question. How would you  
15 determine whether someone is a Nazi?

16 MR. FRENCH: Again, same objection. You can  
17 answer if you -- if you can.

18 THE WITNESS: I mean, they say they are.

19 BY MR. THURLOW:

20 Q. How can you prove that you are not a Nazi?

21 MR. FRENCH: Object to form. You're asking him  
22 to prove a negative.

23 THE WITNESS: Yeah.

24 MR. THURLOW: That is his burden of proof at  
25 trial.



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1 MR. FRENCH: No, that's not.

2 MR. THURLOW: He has to prove that Mr.  
3 Stewartson's statement is false. So he would have  
4 to prove that he is not a Nazi.

5 MR. FRENCH: Well, that's -- it's part of the  
6 element of the defamation. And you know, we can  
7 debate that with the judge and the Court and, you  
8 know, present it to the jury, but you're asking a  
9 question here of a deponent about facts. So I don't  
10 know that that's really a conversation for this  
11 exercise.

12 MR. THURLOW: Our client needs to understand  
13 what facts are available to your client to  
14 understand how to prove his case.

15 MR. FRENCH: Okay.

16 BY MR. THURLOW:

17 Q. So General Flynn, how would you prove that you  
18 are not a Nazi?

19 A. That I've taken the oath of -- of office,  
20 constitutional oath of office multiple times for  
21 different positions in the United States government, and  
22 -- and swore that oath and still live by it.

23 Q. And do you know who -- and let me zoom in real  
24 close because it's in small print and let me go to the  
25 correct page.



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1 Do you know who White Power Wilson is?

2 A. Who? Who? What's it -- say that again?

3 Q. Do you know who White Power Wilson is?

4 A. I do not. I don't believe I do.

5 Q. Are you aware of the phrase "white power" and  
6 what it means?

7 A. I am -- I'm aware of that, of what it means,  
8 yeah. I mean, I guess, yeah. Yeah.

9 Q. What is your understanding of what "white  
10 power" means?

11 MR. FRENCH: Object to form.

12 THE WITNESS: Well, what -- on -- on the  
13 context of what you're looking at there, where --  
14 where is that from? Is that X?

15 BY MR. THURLOW:

16 Q. Yes. This is Paragraph 58 of your complaint.  
17 The statement that you allege is defamatory --

18 A. Yep.

19 Q. It's Mr. Stewartson providing commentary on  
20 this material that looks to be a comment on a link you  
21 tweeted out.

22 A. Okay. That's @RealGenFlynn.

23 Q. Is that -- what is your Twitter handle?

24 A. @GenFlynn.

25 Q. All right.



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1           A.    So -- so Stewartson is reposting something  
2 that's not me, but you -- you get the point. My Twitter  
3 handle is @GenFlynn. There's multiple General Flynn's  
4 that, you know, that are out there, you know, doing  
5 things in -- in a nefarious way.

6           Q.    Yes. And I believe Paragraph 65 is the next  
7 remaining statement. So let me scroll to that.

8           MR. FRENCH: Before we even get there, can we  
9 take a comfort break about five minutes?

10          MR. THURLOW: Yeah, absolutely. Let's take a  
11 ten-minute break.

12          MR. FRENCH: All right. Sounds good.

13          THE VIDEOGRAPHER: Off the record. It is  
14 11:06.

15                (A recess was taken.)

16          THE VIDEOGRAPHER: We are on the record. It is  
17 11:23.

18          BY MR. THURLOW:

19          Q.    All right. I'm going to share my screen back  
20 to what we previously referenced as Exhibit 2, which is  
21 the plaintiff's second amended complaint. And we were  
22 discussing -- it is Paragraph 65.

23                General Flynn, do you recall an event in 2021  
24 where you said, "One nation under God and one religion  
25 under God"?



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1 A. I do.

2 Q. Can you describe the context of that event?

3 A. I was introducing a Christian band at that  
4 time, and it was at a Reawaken America event, and I  
5 forget the -- the -- I forget where we were, what town  
6 or city we were in, but I was up introducing a -- a -- a  
7 Christian band that was about to play.

8 Q. Is it your belief that there should only be  
9 one religion in the United States?

10 A. No.

11 Q. So what did you mean when you said, "One  
12 nation under God and one religion under God"?

13 A. I think I'd have to go back and look at the  
14 context of the -- of introducing that band because  
15 that's pretty much what I was -- what I recall doing,  
16 maybe just a way I stated it.

17 Q. Are you aware that the Ku Klux Klan supported  
18 there being one God in the United States?

19 MR. FRENCH: Object to form.

20 THE WITNESS: I'm not aware of it. Nope.

21 BY MR. THURLOW:

22 Q. Do you see --

23 A. That's not something I pay attention to.

24 Q. Do you see the picture of Mr. Stewartson's  
25 tweet of what appears to be the Ku Klux Klan?



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1 A. I -- I -- I do. It's a little bit, you know,  
2 it's tough because of what we're looking at here, but I  
3 do see it. Yeah. Yeah.

4 Q. So how does your comment differ from that sign  
5 that's being held by the Ku Klux Klan in the picture?

6 MR. FRENCH: Object to form.

7 THE WITNESS: I'm not sure I understand what  
8 you're asking, or what -- what -- what is it that  
9 you -- I mean, and frankly -- frankly, if you  
10 could --

11 BY MR. THURLOW:

12 Q. How --

13 A. If you could expand the -- the picture a  
14 little bit.

15 Q. Sure.

16 A. Can't really see.

17 Q. Yeah. It's not great image quality, but yeah,  
18 I'll --

19 A. Yeah, that's good. That's better.

20 Q. I think I lost the page. Let me just go back.

21 A. Go back. Go back a little. Yeah, that's a  
22 little bit better.

23 Q. Each time I zoom in, it goes to a different  
24 page. Do you see the sign in that picture being held by  
25 people in white robes?



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1 A. I can see the picture, yeah.

2 Q. How does that sign differ than what you said  
3 at this November 2021 event, "one nation under God and  
4 one religion under God"?

5 MR. FRENCH: Object to form. You mean other  
6 than the words and the setting?

7 THE WITNESS: Yeah. I don't -- I don't -- I'm  
8 not sure what you're asking me. I mean, you know, I  
9 -- I think I explained -- I think I gave you -- you  
10 know, the context of when I said it.

11 BY MR. THURLOW:

12 Q. Do you know what the people in that picture  
13 meant when they held that sign?

14 MR. FRENCH: Object to form.

15 THE WITNESS: I don't. I don't really. I -- I  
16 really don't.

17 BY MR. THURLOW:

18 Q. What did you mean when you said, "One nation  
19 under God and one religion under God"?

20 A. I think I meant one nation under God, which  
21 is, you know, out of -- out of our pledge and, you know,  
22 one religion under God, I mean, I think it was in the  
23 context of introducing the -- the -- the -- the band  
24 that was about to play at our event, which was a  
25 Christian band.



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1 Q. Do you believe that it was the stance of Nazis  
2 that there's only should be one religion?

3 MR. FRENCH: Object to form.

4 THE WITNESS: Did I -- say that again? It --  
5 you're what now? I mean, seriously. Go ahead.

6 BY MR. THURLOW:

7 Q. Do you know if it was the position of Nazis  
8 that there should only be one religion?

9 MR. FRENCH: Object to form.

10 THE WITNESS: Yeah, I don't -- I don't know  
11 that. I don't, you know, I'm not sure I understand  
12 your question, but I -- I don't think so. I'm not  
13 sure. I actually think that they didn't want any  
14 kind of God. If I -- if I remember my history, Nazi  
15 socialism, remember.

16 BY MR. THURLOW:

17 Q. And what is your understanding of a second  
18 Holocaust?

19 A. I had no idea.

20 Q. How did Mr. Stewartson defame you by saying,  
21 you want a second Holocaust?

22 A. The -- the amount of -- of hurt. So mentally,  
23 emotionally, and intellectually. When you say something  
24 like that to a guy like me is -- is pretty severe. And  
25 the other element of it is, George, is that by saying



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1 that, and I don't know whether Stewartson would act out  
2 on what he says, but it causes others to act out on  
3 these kinds of -- on these kinds of words.

4 I mean, these are so dangerous. You know, I  
5 mean, like he says in the -- in the third line there,  
6 right, not on our blank watch, rise up. I mean, what's  
7 he -- is he -- is he whistle-blowing, whistle calling to  
8 people that he knows, or just others that are out there  
9 that he wants to -- wants them to do something even more  
10 dangerous than just stating it. I mean, that's the  
11 problem.

12 Q. And do you recall, I guess it was on November  
13 15, 2021, saying, "We have to get rid of these  
14 disgusting politicians. Choose America first leaders"?

15 A. I may have said that. I don't -- I don't  
16 remember it sitting here today, but I may have said  
17 that, yeah. Depends on the -- on the context of what  
18 we're -- of what it was talking about.

19 Q. How does your rhetoric differ from Mr.  
20 Stewartson's rhetoric?

21 MR. FRENCH: Object to form.

22 THE WITNESS: Yeah, I don't -- I mean, I'm not  
23 -- I don't know if -- if -- if my rhetoric goes to  
24 the level of -- of what he's done to go after me  
25 personally. I mean, he -- he's not -- this guy is



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1 known for going after Mike Flynn personally.

2 I'm not -- I'm not known for going after Jim  
3 Stewartson or any one person personally, unless it's  
4 the likes of somebody like Jim Comey or John  
5 Brennan, who, you know, we now know, you know, did  
6 things that they shouldn't have done.

7 But -- but I don't go after like I don't go  
8 after him personally. You know, I don't go after --  
9 I don't pick on somebody online and go after them  
10 personally constantly, with -- with the kind of  
11 rhetoric that he goes -- that he uses at his --  
12 again, I -- I keep saying this, I'll repeat, is  
13 very, very dangerous rhetoric.

14 BY MR. THURLOW:

15 Q. Would you clarify if filing a lawsuit is going  
16 after someone personally?

17 A. You know, I think what I'm -- what I'm getting  
18 at, is that I'm not going after his speech, I'm going  
19 after the lies, right. The lies that he spews, and --  
20 and then -- and then what he might cause with those  
21 lies. Not -- not his speech.

22 You know, he can say what he wants. I guess  
23 if he decided he's -- I'm going to be his principal  
24 target. I mean, I think he's made other people targets  
25 too now, but it's really about the lies and not his



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1 speech. That's kind of where I'm at.

2 Q. And in this particular statement for Mr.  
3 Stewartson, what are the lies?

4 A. That I surround myself with Nazis, I want to  
5 be Hitler, Jesus. I want a second Holocaust. I mean,  
6 those are just -- those are just flat out lies.

7 Q. How would you prove that you do not surround  
8 yourselves with Nazis?

9 A. I mean, you just have to, you know, you'd have  
10 to look at all the people that I -- that I stand on  
11 stages with. I mean, so if you think -- if you think  
12 Kash Patel is a Nazi, I've stood on a stage with Kash  
13 Patel.

14 If you think Eric Trump is a Nazi, I've stood  
15 on stages with Eric Trump. If you think Donald Trump is  
16 a Nazi, I've stood on stages with President Trump. I've  
17 stood on stages with -- with rabbis, with pastors, with  
18 priests, with doctors.

19 You know, so I've stood on -- I've -- I've --  
20 I've surrounded myself with a lot of good, decent, high-  
21 profile people. You know, is that -- is that what he's  
22 talking about? So, you know, I mean, I -- I'm -- I  
23 mean, I -- I think I can -- I think from my perspective,  
24 I, you know, the type of people that I surround myself  
25 with is pretty -- pretty positive and pretty obvious,



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1 and very, very transparent.

2 Q. Have you ever heard of people calling  
3 political leaders they disagree with Nazis before, in  
4 generalities?

5 A. Yeah. I think I probably have heard people  
6 use rhetoric like that. Again, you know, that's --  
7 that's -- that's, you know, that's the speech part of  
8 what I'm trying to get across. It's not about the  
9 speech. It's about the lies. The lies are -- really  
10 hurt and -- and cause -- cause damage, to include the  
11 potential for physical damage.

12 Q. And when you have heard another political  
13 leader referred to as a Nazi, do you actually believe  
14 that they're a Nazi?

15 MR. FRENCH: Object to form.

16 THE WITNESS: It depends on the context.  
17 Honestly, depends on the context. If they've  
18 demonstrated -- or said, you know, or demonstrated  
19 in their actions or their, you know, their -- their  
20 things. I mean, you know, that -- those type of  
21 political leanings, but you know, again, it's not so  
22 much the speech as it -- it is the lies.

23 BY MR. THURLOW:

24 Q. And have you ever heard the term "Nazi" used  
25 hyperbolically?



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1 MR. FRENCH: Object to form.

2 THE WITNESS: I -- you know, I can't say that I  
3 have. I mean, I -- you know, I've heard a lot of  
4 things use hyperbolically.

5 BY MR. THURLOW:

6 Q. Have you ever heard a political leader being  
7 compared to Hitler hyperbolically?

8 MR. FRENCH: Object to form.

9 THE WITNESS: Not -- not as much as I've heard  
10 it out of this guy. I mean, I -- I really -- it's  
11 really -- it -- it's really something.

12 BY MR. THURLOW:

13 Q. Did you ever compare COVID-19 vaccine mandates  
14 to 1930s Germany?

15 A. I don't know.

16 Q. Do you believe that comparisons between COVID-  
17 19 vaccine mandates in 1930s Germany are fair?

18 MR. FRENCH: Object to form.

19 THE WITNESS: Yeah, I don't -- I'm not sure  
20 what you're -- what you're getting at, or what  
21 you're asking. I mean, I'm not -- I don't know.

22 BY MR. THURLOW:

23 Q. And have you ever heard people refer to the  
24 term "something Holocaust" hyperbolically?

25 MR. FRENCH: Object to form.



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1 THE WITNESS: Something Holocaust?

2 BY MR. THURLOW:

3 Q. Yeah. Such as second Holocaust?

4 MR. FRENCH: Object to form.

5 THE WITNESS: Yeah. I -- I don't -- I don't  
6 know. I don't -- I'm not sure I've heard, other  
7 than from Stewartson, the use of that phrase, like  
8 the way he uses it, very purposely, very  
9 intentionally, and -- and it's a lie. It's just a  
10 flat lie.

11 BY MR. THURLOW:

12 Q. I'm now going to direct your attention to  
13 Paragraph 83 of the complaint. Do you know who Jack  
14 Posobiec is?

15 A. I do.

16 Q. How do you know Jack Posobiec?

17 A. I know him from different interviews I've done  
18 with him, and from at least one, maybe two events, that  
19 I have been part of -- or a couple -- probably more than  
20 two, but a couple of events that I've been part of with  
21 Jack Posobiec.

22 Q. Do you know if Jack Posobiec ever served at  
23 Guantanamo Bay?

24 A. I understand that he did because I've heard  
25 him talk about it.



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1 Q. Did you ever visit Guantanamo Bay during your  
2 time in the military?

3 A. I did.

4 Q. Do you know if prisoners were ever tortured at  
5 Guantanamo Bay?

6 MR. FRENCH: Object to form.

7 THE WITNESS: I -- I don't. I don't know that.

8 BY MR. THURLOW:

9 Q. Have you ever heard Jack Posobiec discuss the  
10 activities he engaged in while he was at Guantanamo Bay?

11 A. I have.

12 Q. What is your understanding of those  
13 activities?

14 A. I've heard him talk about them on some of the  
15 shows that I've heard him on, you know, heard him speak  
16 on, and -- and where I -- I think if I remember  
17 correctly, he is a intelligence analyst and he supported  
18 some of the -- some of the -- the -- the questioning of  
19 the prisoners that were being held at Guantanamo Bay.

20 Q. And did you have a superior rank in the  
21 military to Jack Posobiec?

22 A. I did have a -- a -- a -- a superior rank or a  
23 more senior rank to Jack. Yep.

24 Q. Would Jack Posobiec would have to have  
25 followed any orders that you gave him in the military?



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1 A. If I -- yeah, he would've if I had given him  
2 any, sure.

3 Q. As a defense intelligence agency director, did  
4 you provide any direct orders to people under your  
5 command?

6 A. I did.

7 MR. FRENCH: Object to form.

8 THE WITNESS: Yeah. I mean, I did. It was,  
9 you know, like I said earlier, it was probably, you  
10 know, 20,000 plus people.

11 BY MR. THURLOW:

12 Q. And you wouldn't not necessarily know who had  
13 to follow your orders given the large size of the  
14 organization?

15 MR. FRENCH: Object to form.

16 THE WITNESS: Yeah. I mean, that you're --  
17 you're, you know, I mean, I don't -- I don't know  
18 what you're asking. I mean, would people have to  
19 follow my orders if I gave an order as a -- as a  
20 commander or as a director?

21 BY MR. THURLOW:

22 Q. Yes. Would --

23 A. Is that what you're asking?

24 Q. Yes. Would everyone in the military under you  
25 had to follow that order?



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1 MR. FRENCH: Object to form.

2 THE WITNESS: I mean, it -- it depended on --  
3 yeah. I mean, obviously they -- they would if I --  
4 if I issued it.

5 BY MR. THURLOW:

6 Q. Did you issue any orders pertaining to  
7 Guantanamo Bay while Jack Posobiec was stationed there?

8 A. I have no knowledge of that at all. None.

9 Q. Did the DIA conduct any activities at  
10 Guantanamo Bay while you were DIA director?

11 MR. FRENCH: Object to form.

12 THE WITNESS: I'd have to go back and -- and --  
13 and examine what -- what, you know, what things  
14 occurred during that period of time, you know, from  
15 those couple years. But, you know, unknown sitting  
16 here today, certainly don't recall.

17 But if we did, we did, right. I mean, it was  
18 -- it was, you know, again, you know, we're -- DIA  
19 was in 142 countries when I was the director.

20 BY MR. THURLOW:

21 Q. And do you know if Jack Posobiec served in  
22 DIA?

23 A. I am aware that he did.

24 Q. Now, let's turn to Paragraph 84. Have you  
25 ever been affiliated with the QAnon movement?



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1 A. I don't believe I have. I've been accused of  
2 many things, but -- so couldn't tell you what it is.

3 Q. Are you aware of what happened at the United  
4 States Capitol on January 6, 2021?

5 MR. FRENCH: Object to form.

6 THE WITNESS: I -- I am aware of -- of what has  
7 been reported to have happened.

8 BY MR. THURLOW:

9 Q. Were you in Washington DC on January 6, 2021?

10 A. I was.

11 Q. What were you doing in Washington DC on  
12 January 6, 2021?

13 A. Freezing my ass off.

14 Q. Where -- what were you doing? Elaborate more?

15 A. I was -- as -- at the time staying in a hotel,  
16 I ended up going out to watch the -- the various  
17 speeches at the -- at the, you know, in the Capitol lawn  
18 there. Not -- not the Capitol, but the White House  
19 lawn. And then immediately after all of the speeches, I  
20 went back to my hotel room.

21 Q. Did you give a speech on the White House lawn?

22 A. No.

23 Q. Did you help organize the event that was on  
24 the White House lawn?

25 A. Nope.



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1 Q. Did you agree with the speeches you heard on  
2 the White House lawn?

3 MR. FRENCH: Object to form.

4 THE WITNESS: I'd have to hear them again. From  
5 what I recall, I -- I don't know if I was -- I -- I  
6 -- I don't -- I don't know. I -- I'd have to go  
7 back and listen to the speeches again, you know.

8 BY MR. THURLOW:

9 Q. Did you do or say anything to distance  
10 yourself from any of the speeches on the White House  
11 lawn that day?

12 MR. FRENCH: Object to form.

13 THE WITNESS: Yeah, I don't -- I don't recall.  
14 You know, I don't know. I just remember how cold it  
15 was.

16 BY MR. THURLOW:

17 Q. And do you know if any of the people who were  
18 on the White House lawn that day later stormed the  
19 United States Capitol Building?

20 MR. FRENCH: Object to form.

21 THE WITNESS: No idea. It was -- it was a  
22 million people plus.

23 BY MR. THURLOW:

24 Q. Did you ever hear the chant, "Hang Mike  
25 Pence"?



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1 A. I am aware of that, that that chant occurred,  
2 but I am -- I don't -- I don't think that I was ever in  
3 any place where I heard it stated.

4 Q. How do you know that Defendant Stewartson knew  
5 what he posted about you was false?

6 A. Posted which -- what -- I mean, be -- be -- be  
7 specific here. Like, what are you talking about?

8 Q. How do you know that -- what -- the four  
9 statements that are subject of this lawsuit, that  
10 Defendant Stewartson posted about you, how do you know  
11 that those statements are false?

12 A. That when he states that I'm a Nazi or that I  
13 wanted to do -- do something about Mike Pence, or -- or  
14 I wanted a second Holocaust, how do I know they're not  
15 false? Is that what you're asking?

16 Q. How do you know that Defendant Stewartson  
17 knows they are false?

18 A. How do I know he knows they're false?

19 Q. Yes.

20 A. I can't imagine somebody, you know, that --  
21 that would say those kinds of things. So I -- I guess  
22 -- I guess what -- the way I think about your question  
23 is that, so if -- if he's saying them and he thinks that  
24 they're false and he's lying, and he's putting me at  
25 risk and my family at risk, so if he's saying them



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1 knowing that they're not true, then he's lying. If he's  
2 saying them and he believes them, then he is putting  
3 even a bigger target on me because they're not true.

4 And -- and that's -- that's the challenge. I  
5 mean, that's the -- that's the -- that's the problem  
6 here, that this guy is just lying one way or the other,  
7 and, you know, if he -- if he didn't make it personal, I  
8 probably -- probably wouldn't be having this  
9 conversation, but he's made it personal by lying, and  
10 not just using his first amendment right.

11 Q. Are you aware of the actual malice threshold  
12 of -- for defamation of public figures?

13 MR. FRENCH: Object to form. You're asking  
14 him --

15 THE WITNESS: Yeah.

16 MR. FRENCH: -- for a legal conclusion.

17 THE WITNESS: Yeah, right. I mean, that's up  
18 to -- I -- I -- that's -- that's for the -- for you  
19 guys to figure out.

20 BY MR. THURLOW:

21 Q. What are the significant damages that you have  
22 suffered?

23 MR. FRENCH: I object to the form to the extent  
24 that any answer you provide is based upon  
25 discussions you've had with counsel in preparation



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1 of this litigation and trial. If you have any  
2 answer beyond that, you're welcome to answer.

3 THE WITNESS: I mean, strategically, George,  
4 I've already mentioned it a bunch of times. You  
5 know, the -- the -- the -- the mental, the -- the  
6 emotional, the real potential for physical harm, you  
7 know, the -- just the -- the inability -- the -- the  
8 amount of times that I've had to, you know, even  
9 read a post from this character because somebody  
10 sent me something and said, do you believe this guy?

11 Do you -- is this -- you know, I mean, it's  
12 just -- it's like one thing after another and you  
13 kind of go -- and -- and that initially you sort of  
14 go, this is just a -- a one-off. But then after a  
15 while, it's like, no, this guy is very, very serious  
16 and it becomes a very serious issue.

17 And so, you know, significant damages, you --  
18 you know, that can be argued between you and -- and  
19 the -- and the team here. But -- but I -- but I can  
20 tell you it -- it is, you know, my time is very  
21 valuable, George. And here I am at -- at this point  
22 in time because I believe how much harm has been  
23 done to me and, I -- I will always state, my family  
24 because they're -- you know, and this guy reposts a  
25 picture of my wife, puts a target on her.



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1 I mean, the -- I don't know. I don't know what  
2 it -- I don't know what the lying -- you know, it's  
3 not about speech to me. You know, people I -- I've  
4 -- was willing and still am willing to give my life  
5 for the protection of our constitutional rights, but  
6 the lies are what really hurt.

7 BY MR. THURLOW:

8 Q. And how has your reputation been damaged by  
9 Defendant Stewartson's tweets?

10 A. There's still a lot of people out there that  
11 believe the nonsense that guys like -- like Stewartson  
12 tweet. There are just a lot of people out there that  
13 believe I'm a -- I'm a -- I committed treason. I -- you  
14 know, all these different things, right? I -- I -- I,  
15 you know, ran a -- a -- a -- a pedophile ring.

16 I mean, all these crazy, crazy lies that --  
17 that he has put out, there's a lot of people that still  
18 believe that. I still have to deal with that, you know.

19 I can give you an example. I can give you  
20 examples, but it's just -- it's one after another, where  
21 I still have to deal with that. And it's not true. None  
22 of it is true. But because a person like him with the  
23 large number of followers that he has and whatever other  
24 things he's involved in, you know, God help me, people  
25 just believe him, and they're lies.



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1 Q. Can you give any examples of when you have  
2 dealt with someone who has believed what Mr. Stewartson  
3 has said?

4 A. Now, I don't know whether it was directly  
5 related to him, but I -- but I have to believe it. You  
6 know, when I -- I went to a -- an event in -- in -- up  
7 in New England, I believe, where it was like all these  
8 people out there with their protest signs, right,  
9 calling me all kinds of names, names that -- that he's  
10 used, like traitor, treason, puppet, anti-Semite, or  
11 whatever. You know, all -- all the different names,  
12 right? Nazi. And they've got all their signs up, and  
13 I've got to walk through all that to get into a -- an  
14 event, right?

15 That is an event, in this specific example,  
16 that I had invited my mother-in-law to, you know,  
17 because she hadn't got a -- she's older, and she didn't  
18 have a chance to see me at times, so -- and -- and, you  
19 know, it's an event where a couple hundred people showed  
20 up, and they just wanted to hear what I had to say about  
21 what's going on in the country, right? Because I have  
22 an expertise in some of those areas. And you've got to  
23 go through all that, right?

24 Q. When was this event?

25 A. That was, I don't know, probably a year ago,



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1 maybe over a year ago in Cranston, Rhode Island.

2 Q. And are there any photographs of the signs  
3 that you had to face at this event?

4 A. Sure. There's probably some -- probably some  
5 out there. It was carried in the local media.

6 Q. Do you have any photographs in your  
7 possession?

8 A. I don't. I don't believe I do.

9 Q. And you've mentioned that people have accused  
10 you of treason. Are there any reasons that you know of,  
11 besides Mr. Stewartson's tweets, that someone might  
12 allege that you've committed treason?

13 MR. FRENCH: Object to form.

14 THE WITNESS: I'm not aware.

15 BY MR. THURLOW:

16 Q. Have you ever been criminally prosecuted  
17 before?

18 MR. FRENCH: Object to form.

19 THE WITNESS: I have not.

20 BY MR. THURLOW:

21 Q. And how have you been humiliated as a result  
22 of Defendant Stewartson's tweets?

23 A. It's when you walk into public forums or you  
24 go to dinner with your wife, you are shopping in your  
25 grocery store, you are, you know, going to a -- a -- a



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1 -- a baseball game or a basketball game or some -- some  
2 event, you know, and -- and you have -- and just the way  
3 people look at you. You know, you -- you'll -- when  
4 you're -- when you're that kind of a subject of these  
5 kinds of attacks, you just -- you can see it. You can  
6 -- you can hear it in some cases.

7 Q. Can you give some specific examples of what  
8 has happened at these events you mentioned?

9 A. Well, somebody comes up to you and calls you a  
10 traitor.

11 Q. Has that ever happened to you?

12 A. Yes.

13 Q. How many times has that happened to you?

14 A. I don't recall.

15 Q. Was it more than once?

16 A. Yes.

17 Q. More than five times?

18 A. I don't know, George, how many times. Once is  
19 enough when it's a lie.

20 Q. Do you know if those -- do you know if those  
21 people ever read Mr. Stewartson's tweets?

22 A. No idea.

23 Q. How have Mr. Stewartson's statements caused  
24 embarrassment to you?

25 A. It's the same thing, same thing that I just



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1 stated. Same sort of, you know, issues.

2 Q. Do you know if anyone besides Mr. Stewartson  
3 has said anything critical about you on Twitter or X?

4 MR. FRENCH: Object to form.

5 THE WITNESS: Yeah, I don't -- I don't -- I  
6 don't know.

7 MR. THURLOW: I'm now going to pull up another  
8 document. Give me one moment.

9 I'm going to mark this Exhibit 3.

10 And these are Plaintiff Michael T. Flynn's  
11 Objections and Responses to Defendant's First Set of  
12 Interrogatories.

13 (Exhibit 3 was marked for identification.)

14 BY MR. THURLOW:

15 Q. General Flynn, do you recall preparing  
16 responses to these interrogatories?

17 A. I'd have to look at it, George. I -- I mean,  
18 if you can expand it a little bit, would it be helpful?

19 Q. Yeah. I'm zooming in, and it's a 14-page  
20 document.

21 A. Okay. And -- and so ask your question.

22 Q. Do you recall preparing your responses to  
23 these interrogatories?

24 A. I don't recall.

25 Q. All right. And I'll turn your attention to



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1 Interrogatory number 2. Do you recall the case of Flynn  
2 v. Stern that you filed in St. Johns County, Florida?

3 A. I do recall that.

4 Q. What were the claims you made against the  
5 defendant in that case?

6 A. You'd have to talk to my lawyer about it. I  
7 -- I -- you know, I don't recall the exact claims.

8 Q. Do you recall the case of Burke v. Townsend?

9 A. I don't, no.

10 Q. Do you recall if you were a plaintiff or  
11 defendant in this case?

12 A. I -- I'm not -- I -- I don't recall. Yeah,  
13 it's not -- not -- you know, I -- I -- I don't recall.

14 Q. Do you recall anything about the subject  
15 matter of the case?

16 A. I don't.

17 Q. Do you recall the case of Flynn v. Wellman  
18 filed in federal court in the Middle District of  
19 Florida?

20 A. I do not. No.

21 Q. Do you know what the subject matter of that  
22 case was?

23 A. I do not.

24 Q. Do you recall the case of Flynn v. United  
25 States of America filed in the Middle District of



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1 Florida?

2 A. I mean, you want to open up the cases, or do  
3 you want -- I mean, how do you want to do this, George?  
4 Because, I mean, I -- I -- you know, you're asking me  
5 things that -- you know, about some case and -- and, you  
6 know, as you know, cases are going to have -- you know,  
7 they're going to have documents that are going to go  
8 with them.

9 And so, I mean, in general, do I -- do I  
10 recognize these -- these things? I do, generally. I  
11 don't recall the exact issues.

12 Q. And do you recall the case of Flynn v.  
13 Weissman?

14 A. I -- I generally recall it. Yeah.

15 Q. Do you know what the lawsuit was pertaining?

16 A. I don't.

17 Q. Do you recall the case of Flynn v. Stern filed  
18 in the Middle District of Florida?

19 A. I generally do. I, you know, recall the case.  
20 I mean, the specifics, it's been a while.

21 Q. And do you recall the case of Flynn v. Pelosi?

22 A. I generally recall it. Yep.

23 Q. Do you know what the subject matter of that  
24 lawsuit was?

25 A. I don't. I forget.



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1 Q. And do you know if you made claims for  
2 defamation in any of these lawsuits?

3 A. I don't know.

4 Q. Would it surprise you if you made claims for  
5 defamation in any of those lawsuits?

6 A. It would not surprise me.

7 Q. And if you had made claims for defamation in  
8 any of those lawsuits, how would you know -- are you  
9 alleging that those people as well as Mr. Stewartson  
10 damaged your reputation?

11 MR. FRENCH: Object to form. I -- I'm not sure  
12 we understand that.

13 THE WITNESS: Yeah. Say that again.

14 BY MR. THURLOW:

15 Q. If any of these previous lawsuits have  
16 included claims for defamation against the defendants,  
17 how can you determine what damages were caused by Mr.  
18 Stewartson and what damages that you alleged were caused  
19 by these any number of other defendants?

20 MR. FRENCH: I'm going to object again. To the  
21 extent you've had any conversations with counsel  
22 regarding preparation of damages analysis for this  
23 case and preparation for trial, do not answer. But  
24 if you have any independent knowledge about -- that  
25 would provide a response, you can do so.



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1 THE WITNESS: Yeah, I don't know, George.

2 BY MR. THURLOW:

3 Q. All right. And I'm going to turn your  
4 attention to Interrogatory Number 7, where you say,  
5 "Many large companies and organizations that Plaintiff  
6 used to work with until recently will no longer engage  
7 in business with him."

8 Can you identify these large companies?

9 A. Yeah. Many -- many defense contractors, you  
10 know, as an example. So some -- some that are -- that I  
11 used to be able to, you know -- you know, consider  
12 myself maybe getting a -- as an advisor or on a board of  
13 directors or such like that. But those -- those aren't  
14 reaching out anymore because of the defamation and --  
15 and malice directed against me. So they --

16 Q. Can you specifically --

17 A. -- they tend to -- they tend to stay away.

18 Q. Can you specifically identify those companies?

19 A. Yeah, I -- I probably can.

20 Q. What were those companies?

21 A. They would be companies like SAIC, Leidos,  
22 Booz Allen. You know, these are generally defense  
23 contractors, some in the -- some in the -- in the  
24 intelligence community that do things with the U.S.  
25 government that -- that -- you know, they --



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1 they -- you know, they consider me reputational damaged  
2 or damage.

3 Q. And have you ever done business with SAIC  
4 before?

5 A. I have.

6 Q. When was the last time you did business with  
7 SAIC?

8 A. Quite a while ago, actually. After -- after I  
9 retired, certainly, but -- but yeah.

10 Q. Was it before or after 2020 when you last did  
11 business with SAIC?

12 A. It was -- I don't know. I don't -- I don't  
13 recall. I don't recall. I know that I went and did a  
14 speaking engagement with SAIC, and -- and there was some  
15 consideration of having me out as a member of a board,  
16 member of an -- an advisory board, I think.

17 Q. Have you ever done business with Booz Allen  
18 before?

19 A. I don't think I've done business with them in  
20 terms of having a -- you know, a -- a -- a compensation  
21 from them, but I've certainly had conversations with  
22 them.

23 Q. Did you ever discuss a role involving  
24 compensation with Booz Allen?

25 A. I discussed with some of their executives the



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1 types of -- of roles that they had for a guy like me and  
2 what -- what did that mean in terms of compensation. So  
3 yeah, I've had that conversation.

4 Q. When did you have that conversation?

5 A. It's been a while. It's been quite a, you  
6 know, a few years.

7 Q. Was it before or after you served in the first  
8 Donald Trump administration?

9 A. I don't -- I don't know. It's -- it's been --  
10 it's been a few years. It's definitely after -- after I  
11 got out of the military. So I -- I don't -- I mean,  
12 it's been a while.

13 Q. And what organization --

14 A. They certainly -- they certainly haven't  
15 reached back out.

16 Q. All right. And what organizations that you  
17 used to work with are no longer engaging in business  
18 with you?

19 A. A cyber company, Amazon -- no, I'm sorry, not  
20 Amazon. Adobe. Adobe, I used to be on their advisory  
21 board. It never reached back out, you know.

22 Q. When did you serve on Adobe's advisory board?

23 A. I served on that in the 2015 to about 2017  
24 time frame, early 2017 time frame.

25 Q. When did Mr. Stewartson start tweeting about



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1 you?

2 A. I don't know.

3 Q. And have you experienced a loss of income in  
4 recent years?

5 A. I have experienced lost opportunities. I  
6 mean, you know, when you say income, I mean, you know,  
7 I've definitely experienced lost opportunities. And --  
8 and, you know, I mean, it was one of the things I -- you  
9 know, I've been -- I've been debanked. My wife has been  
10 debanked.

11 So, you know, when you get -- when that  
12 happens to you, you know, you -- those are just things  
13 that happen, and -- and you don't know why or -- or  
14 where that's coming from other than their own -- what --  
15 what they're looking at is happening to you. So I  
16 definitely have experienced lost opportunities.

17 Q. Do you file annual tax returns?

18 A. Yes.

19 Q. Do you know what year your last tax return  
20 filed was for?

21 A. I'm going to say 20 -- I'm going to say 2024,  
22 I guess. I mean, I -- I -- I -- yeah, I'm going to just  
23 -- I'll -- I'll say 2024.

24 Q. And was the income on your 2024 tax return  
25 higher than the income on your 2023 tax return?



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1 A. I don't know.

2 Q. In your interrogatories you said, "As  
3 Plaintiff's tax documents will show, Plaintiff has lost  
4 income in recent years." What tax documents support  
5 that loss of income that you allege?

6 A. I'd have to go look at them. I'm not worried  
7 about showing them.

8 Q. I'm going to turn to Interrogatory 15 now.  
9 Now, how do you know that Mr. Stewartson's statements  
10 about you are not his genuine opinion?

11 A. Where are you looking at here, George?

12 Q. I mean, there are lots of places in this one  
13 where you talk about how the defendant has made things  
14 up and is lying about you. And I'm asking if you have  
15 any basis to know that these are not his genuine  
16 opinions, what he has said about you?

17 MR. FRENCH: Object to form.

18 THE WITNESS: Yeah. I -- I think that there is  
19 a -- a pattern and a consistency and a duration that  
20 Stewartson has demonstrated. And in all cases, that  
21 -- that pattern, that duration, and that consistency  
22 of the lies that he has been spewing, you know, they  
23 eventually sink in to some level of audience. And  
24 that -- that is what is so hurtful.

25 And -- and again, for a -- a person who worries



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1 about his life and his family's life, that's where I  
2 -- I had to draw a line, you know, because it's no  
3 longer about his, you know, free -- freely -- free  
4 ability to be able to speak. It's now, you know,  
5 incredible levels of lying for a long period of  
6 time, very -- very consistently in his pattern of  
7 the way he uses his language and the kinds of things  
8 he's -- you know, it's like he doesn't call me one  
9 thing and then calls me another. He's been very  
10 intentional about what he has said, and it is very,  
11 very -- not just hurtful. It's dangerous.

12 BY MR. THURLOW:

13 Q. I'm going to now turn to Interrogatory Number  
14 21. Do you -- did you attend a meeting at the White  
15 House on December 18, 2020?

16 A. I believe I did.

17 Q. Do you recall what was discussed at that  
18 meeting?

19 A. In general.

20 Q. Sure. In generalities, what was discussed at  
21 that meeting?

22 A. The elections of 2020. Election process of  
23 2020.

24 Q. Did you discuss Mike Pence's role in  
25 certifying the 2020 presidential election results at



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1 that meeting?

2 A. I don't recall.

3 MR. THURLOW: I know Craig is going to have  
4 some questions for you, but this might be a good  
5 time to break for lunch.

6 How long -- on Plaintiff's side, how long would  
7 you like for a lunch break?

8 MR. FRENCH: What time is it now?

9 MR. WHISENHUNT: 12:15.

10 MR. FRENCH: How much longer do you all  
11 anticipate going?

12 MR. THURLOW: Craig?

13 MR. WHISENHUNT: So I don't know exactly how  
14 long. I know I got here a little bit late, but I  
15 believe there was some indication we may be  
16 receiving some documents, Stephen.

17 So if you're able to get those to us over the  
18 lunch break, I'd like to try and review them so we  
19 can do all this in one day if we can. But I don't  
20 know to the extent you're going to be able to share  
21 anything or what we may have to ask of that. I  
22 would estimate probably an hour, an hour-and-a-half  
23 total.

24 MR. FRENCH: Okay. Do you want to push through  
25 and --



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1 THE WITNESS: I'd rather just push through.

2 MR. FRENCH: I mean, we -- we're happy to just  
3 take a brief break and then just push through if you  
4 think you're getting done in two hours. I know we  
5 need to send you those documents. We can do that in  
6 a ten- minute break.

7 MR. WHISENHUNT: Yeah. I just also will need  
8 time to look at them, but I'm -- if you can get them  
9 to me within the next ten minutes, let me give a --  
10 like a real quick cursory review of it and see if  
11 it's going to be something we can delve into today.

12 If so, we may take another break so I can  
13 review them more thoroughly and prepare those  
14 questions. If they're voluminous and it's not going  
15 to be possible, then we'll try and coordinate  
16 another time very quickly.

17 MR. FRENCH: Well, I can tell you what it is,  
18 and it -- this is going to issues about kind of  
19 direct costs and dollar monies. Is, one, we have a  
20 transaction report that shows the level --

21 MR. WHISENHUNT: Steve, I don't mean to  
22 interrupt you. Do you want to go off record for  
23 this part? Logistically, we're just -- it's up to  
24 you.

25 MR. FRENCH: I want this off record.



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1 THE VIDEOGRAPHER: Okay. Off the record. It  
2 is 12:15.

3 (A recess was taken.)

4 THE VIDEOGRAPHER: On the record. It is 12:34.

5 EXAMINATION

6 BY MR. WHISENHUNT:

7 Q. All right. Good afternoon. My name is Craig  
8 Whisenhunt, and I'm one of the other attorneys  
9 representing Mr. Stewartson, and I want to kind of go  
10 through more specifically the substance and context  
11 around the four remaining statements that are being  
12 litigated in this case.

13 I know we've spent a lot of time already kind  
14 of nitpicking some of the details and language of the  
15 complaint. I don't intend to really address that going  
16 further.

17 I really want to get to the heart and  
18 substance of the statements you found to be tremendously  
19 offensive and dangerous and the context around them,  
20 okay?

21 A. Absolutely.

22 Q. All right. Would you agree that in our  
23 current kind of political climate, the temperature has  
24 really just ratcheted up and become very divisive?

25 MR. FRENCH: Object to form.



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1 THE WITNESS: I mean, I -- I think it's gotten  
2 worse, yes.

3 BY MR. WHISENHUNT:

4 Q. All right. And to that extent, one of the  
5 things -- are you familiar with a concept called  
6 Godwin's Law in terms of online internet debates? Have  
7 you ever heard that phrase?

8 A. No, I -- I don't believe I have.

9 Q. In a nutshell, it's basically the idea that  
10 any online argument will eventually result in someone  
11 comparing the other person to being Hitler-like or a  
12 Nazi. It just seems to be like every argument ends  
13 there, okay? You frequently post on X or Twitter or  
14 that platform your views and visions and opinions that  
15 you believe are the best for our country; would you  
16 agree?

17 MR. FRENCH: Object to form.

18 THE WITNESS: I post things that I believe in.

19 BY MR. WHISENHUNT:

20 Q. You certainly aren't posting things that you  
21 don't believe in or don't agree with, right?

22 A. I typically don't. No, that's right. I don't  
23 think I -- I don't think -- I'm just trying to reflect  
24 back on things that I've posted. But yeah, I typically  
25 will post things that I believe.



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1 Q. Now, sometimes people on the internet disagree  
2 with you, right? You'll get responses to things you've  
3 posted that take a different point of view, right?

4 A. Sure.

5 Q. And it doesn't appear that very often you  
6 engage with those people commenting on your posts,  
7 although I think from time to time you do because you  
8 want to understand maybe where they're coming from; is  
9 that fair?

10 A. I have.

11 Q. Sometimes I think, and I want to know if you  
12 agree, the division in perspectives, we're not  
13 necessarily always going to find common ground with  
14 those that we disagree with, right?

15 MR. FRENCH: Object to form.

16 THE WITNESS: Okay. I mean, I -- I --

17 BY MR. WHISENHUNT:

18 Q. So --

19 A. I hear what -- I -- I think I understand what  
20 you're saying.

21 Q. Okay. So when you post or share messages  
22 indicating that we're in a fight for the heart and soul  
23 of our country, you believe that, right?

24 A. I do.

25 Q. Okay. Can you tell me what you mean by that?



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1           A.    I think that we have a constant -- I think --  
2 I think the idea of securing freedom, you know, and  
3 protecting and defending our constitution is something  
4 that is a -- a constant in -- in -- certainly in the  
5 history of the United States of America.

6           Q.    How we go about protecting that is up for  
7 discussion and debate, right?

8           A.    Okay.

9           Q.    Okay.  So you have one perspective, your  
10 vision of what you think this country should be and  
11 should pursue.  I may have a different position.  Mr.  
12 Stewartson may have a different position.  Mr. French  
13 may have a different position.  Would you agree the  
14 beauty of this country is we all get to have our  
15 different visions for the country?

16           MR. FRENCH:  Object to form.

17           THE WITNESS:  I mean, I -- I believe that if  
18 you have a vision, that it's -- and it's -- and it's  
19 one that is worth, you know, debating and -- and it  
20 helps shape the -- the future of the country in the  
21 -- in the way it was, you know, intended to be, I do  
22 -- I do agree.

23           I mean, I think if you're -- if you're lying  
24 about somebody and -- and -- and -- and causing  
25 people that you don't know -- you don't -- you know,



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1 you may not be intending to have somebody shoot me  
2 in the head, you know, in terms of your client.  
3 Maybe he doesn't intend to have somebody shoot me in  
4 the head, but the kinds of things that he says can  
5 cause that. And now we -- and we know that.

6 BY MR. WHISENHUNT:

7 Q. Okay. And I think -- certainly, I can't talk  
8 on behalf of everybody, but I think we would all agree  
9 violence as a consequence of opinions is not what any of  
10 us should want or should advocate for, right?

11 MR. FRENCH: Object to form.

12 THE WITNESS: (No verbal response.)

13 BY MR. WHISENHUNT:

14 Q. Your political rhetoric expresses a fairly  
15 rigid perspective of conservatism overall. Would you  
16 consider yourself to be conservative?

17 MR. FRENCH: Object to form. What's the  
18 relevancy of this?

19 THE WITNESS: Yeah. I mean, right. I mean,  
20 I --

21 BY MR. WHISENHUNT:

22 Q. Oh, it's a foundational question, but I'm just  
23 curious. Do you consider yourself to be politically  
24 conservative?

25 MR. FRENCH: You can call it whatever



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1           foundational is. What's the relevance of it?

2           MR. WHISENHUNT: Because it's -- are you  
3           instructing him not to answer my question?

4           MR. FRENCH: No. No.

5           BY MR. WHISENHUNT:

6           Q. Okay. Then please go ahead and answer the  
7           question.

8           A. I actually, if I -- if I, you know, define  
9           myself, I'm a pretty liberal guy, actually.

10          Q. Okay.

11          A. I -- I, you know, served in our military for a  
12          long time with -- with a lot of different people and I'm  
13          very -- I think -- I think my overall views are pretty  
14          liberal, but I don't consider myself a socialist or a  
15          communist.

16          Q. Okay. And those would certainly be extreme  
17          ends of that political wing, right?

18          MR. FRENCH: Object. Object to form.

19          BY MR. WHISENHUNT:

20          Q. You were asked a few minutes ago about in the  
21          aftermath of the 2020 election. Do you recall -- do --  
22          being in a Newsmax interview on December 17th where you  
23          expressed taking military capabilities into swing  
24          states?

25          A. You have the context or the specific words



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1 that I used?

2 Q. You advocated -- the specific phrase was, "We  
3 could basically rerun the election in those states." And  
4 then you went on to describe, "Martial law has been  
5 instituted 64 times." Do you recall talking about that?

6 MR. FRENCH: Object to form.

7 THE WITNESS: I mean, I -- I recall some of  
8 that conversation. I don't have it in front of me  
9 here because I don't want you to take it out of  
10 context. I mean, are you -- are you stating it  
11 verbatim?

12 BY MR. WHISENHUNT:

13 Q. This is the verbatim quote. You were asked,  
14 "What could President Trump do?" And your response was,  
15 "He could take military capabilities, and he could place  
16 those in states and basically rerun an election in each  
17 of those states, it's not unprecedented. Martial law  
18 has been instituted 64 times."

19 A. Okay.

20 MR. FRENCH: Object to form.

21 BY MR. WHISENHUNT:

22 Q. Do you recall making that statement?

23 A. I recall something along those lines. Yeah.  
24 Yep, I do.

25 Q. Okay. Do you believe that the president at



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1 that time could have instituted martial law?

2 MR. FRENCH: Object to form.

3 THE WITNESS: I'd have to go back and -- and,  
4 you know, I mean -- and look at the -- the full  
5 context of everything, but it didn't need -- he  
6 didn't need to do that, though. No.

7 BY MR. WHISENHUNT:

8 Q. Okay. Did you believe he should suspend the  
9 constitution and delay certifying the election?

10 MR. FRENCH: Object to form on many grounds  
11 that there's a should in there. I mean, you're  
12 asking for some kind of -- I don't know what you're  
13 asking for here that relates in any way to this  
14 lawsuit.

15 MR. WHISENHUNT: I appreciate that, are you  
16 instructing --

17 MR. FRENCH: If you want to -- we can open the  
18 history books and talk about these 64 other  
19 incidences that may have been part of the discussion  
20 and why different matters were done differently at  
21 different times and provide context to all these  
22 comments, if that's what you want to do. And that's  
23 a great debate.

24 But when you're asking this type of question, I  
25 mean, what kind of answers are you trying to get



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1 here that are going to be helpful in any way to this  
2 trial?

3 MR. WHISENHUNT: Well, I appreciate your  
4 curiosity, sir, are you instructing your client not  
5 to answer my question?

6 MR. FRENCH: No, I'm not. I'm just trying to  
7 say this is not --

8 BY MR. WHISENHUNT:

9 Q. Okay, great. Then answer.

10 A. Are you -- are you -- are you planning on  
11 using these for other purposes? Any -- any -- any  
12 statements or comments that I make? Are you planning on  
13 using them outside of this forum?

14 Q. No, sir.

15 A. Are you planning on giving them to any media  
16 outlets or are you planning on --

17 Q. No.

18 A. -- sharing them with other lawyers? I mean,  
19 I, you know --

20 Q. No.

21 A. -- what are you -- what's your plan?

22 Q. I'm simply asking you, as a man who committed  
23 himself to serving our country, who swore an oath to our  
24 constitution, in December of 2020, when you repeatedly  
25 posted and went on television, advocated or seemed to be



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1 advocating the suspension of the constitution and the  
2 imposition of martial law --

3 A. I don't think I ever said.

4 Q. -- is that what you meant?

5 A. I don't think I ever said that. No, I don't  
6 think I ever said that.

7 MR. FRENCH: Yeah. See, that's where you're  
8 jumping the balance. You're saying he's suspending  
9 constitution.

10 THE WITNESS: Yeah. Right.

11 MR. FRENCH: You can take those actions within  
12 the constitution. See, you're making assumptions in  
13 your question that are making it very difficult.  
14 And this is the kind of harassment and provocation  
15 that we are trying to address with the Court.

16 THE WITNESS: Right.

17 MR. FRENCH: And you know, this is not helpful  
18 to preparing these matters and these issues for  
19 trial. If you want to keep going into it, that's  
20 fine. And he can keep answering as he's been  
21 answering. But I, you know, we can be here all day.

22 MR. WHISENHUNT: Great. We're going to do that  
23 then.

24 BY MR. WHISENHUNT:

25 Q. Mr. Flynn, you were asked about those exact



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1 same quotes when you were called to testify before the  
2 January 6th Committee. Do you recall testifying before  
3 that committee of the United States Congress?

4 A. You mean the committee that threw out all the  
5 evidence from that -- from that hearing?

6 Q. Do you recall giving sworn testimony to the  
7 United States Congress January 6th committee?

8 A. I do. A subcommittee you mean?

9 Q. It's a subcommittee. Do you recall giving  
10 sworn testimony to that subcommittee?

11 A. I do.

12 Q. When you were asked about those specific  
13 quotes that I just discussed with you, you pled the  
14 Fifth and refused to answer. Do you recall that?

15 A. You mean I took my Fifth Amendment right?

16 Q. Correct. You asserted that you had a Fifth  
17 Amendment right not to answer a question because you  
18 believed the answer could incriminate you. That's the  
19 Fifth Amendment.

20 MR. FRENCH: I am going to object to the extent  
21 you have any answer to that that goes beyond a  
22 decision that was made based upon counsel's advice.

23 THE WITNESS: Right.

24 MR. FRENCH: If you have anything beyond that,  
25 then you can answer. But if it was based upon



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1 counsel's advice, then I direct you not to answer.

2 BY MR. WHISENHUNT:

3 Q. Okay. Today, are you taking the position that  
4 you had a Fifth Amendment interest in a truthful answer  
5 to your question -- to the questions that were asked of  
6 you by the January 6th subcommittee?

7 MR. FRENCH: And I will provide the same  
8 objection and instruction to you. If your answer  
9 would involve any discussions you had with Counsel  
10 at that time in providing those responses and taking  
11 those actions that you not respond.

12 BY MR. WHISENHUNT:

13 Q. You do have to answer in some form or fashion.

14 A. Those were conversations that I had with my  
15 counsel at the time.

16 Q. Okay. So based upon the advice of counsel,  
17 you didn't answer questions because you believed it  
18 could potentially incriminate you or at least had been  
19 told it might. Got it.

20 MR. FRENCH: Again, the instruction is, to the  
21 extent you have any information, independent and  
22 discrete, separate apart from whatever advice you  
23 received from counsel then, now, or at any time,  
24 you're free to answer, but if you don't, then you  
25 have no answer; is that fair?



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1 BY MR. WHISENHUNT:

2 Q. Sir, on December 1, 2020, on your GenFlynn  
3 Twitter or X handle, you shared a post calling for Trump  
4 to declare limited martial law and suspend the  
5 constitution. Is that a position or opinion you  
6 personally held or were you simply repeating the  
7 position held by someone else?

8 MR. FRENCH: Object to form.

9 A. I'd have to see it. Yeah. I'd have to see  
10 it. Do you have it?

11 Q. We'll get to that. At any point in December  
12 of 2020 or January of 2021, did you speak with President  
13 Trump urging him to invoke any emergency powers, or the  
14 Insurrection Act, or martial law?

15 MR. FRENCH: And again, object to form as well  
16 as I'm not sure of any other privilege you may have  
17 involved in that because I don't know this -- the  
18 extent or source of those conversations.

19 THE WITNESS: Yeah. Yeah. I mean, I -- I did  
20 not. Had no conversations with the president about  
21 any of that.

22 BY MR. WHISENHUNT:

23 Q. You've spoken a lot about the consequence of  
24 the things my client has posted online and how others  
25 may act on it. Do you believe you have a similar



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1 responsibility in being careful with the rhetoric you  
2 post on social media and how it may influence others?

3 MR. FRENCH: Object to form.

4 THE WITNESS: Yeah, I do. I mean, I think  
5 about that.

6 BY MR. WHISENHUNT:

7 Q. So if you are sharing posts that suggests the  
8 election may have been stolen, that there needs to be an  
9 action taken to stop Joe Biden being sworn in, you  
10 believe that, right?

11 MR. FRENCH: Object to form. Object to form.

12 THE WITNESS: I believe that the election was  
13 rigged. 2020 election was rigged.

14 BY MR. WHISENHUNT:

15 Q. And because you believe that and you shared --

16 A. And -- and it also had foreign interference,  
17 which has been stated publicly multiple times by, you  
18 know, senior executives inside of the United States  
19 government.

20 Q. Because you believe that --

21 A. Because it's been stated.

22 Q. Right. You shared that perspective to your  
23 many, many followers, right? And many of those people  
24 may have acted based upon you sharing that with them; is  
25 that fair?



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1 MR. FRENCH: Object to form.

2 THE WITNESS: I don't -- I don't know what  
3 you're getting at. I mean, I don't -- you know,  
4 they may have acted in what way if I said that the  
5 election was rigged?

6 BY MR. WHISENHUNT:

7 Q. They might have then adopted your point of  
8 view, right?

9 MR. FRENCH: Object to form.

10 BY MR. WHISENHUNT:

11 Q. At its core, sir, isn't that why you share  
12 your point of view? Is you're hoping the people who  
13 read it will adopt it? That they'll agree with you?

14 A. That's not necessarily, no. You're -- now  
15 you're reading into my mind whether or not I, you know,  
16 want my followers to -- doesn't make any difference. I  
17 -- I don't -- if they follow or not, or if they agree or  
18 not, it doesn't make any difference. It's what I  
19 believe.

20 Q. Certainly, there have been times I'm sure  
21 you --

22 A. I'm not and I don't go after -- and I'm not  
23 going after, you know, Craig and attacking Craig  
24 personally and maybe talking about a specific issue that  
25 I think is important for the country.



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1 Q. You have, though, as you noted before, gone  
2 after other public personalities and high-profile  
3 figures on a personal level, but I agree with you. I  
4 think I've exhaustively reviewed your Twitter or X feed.  
5 I don't recall you going after everyday citizens as an  
6 individual attack. But certainly Hillary Clinton,  
7 you've been highly critical of. Would you agree you  
8 were highly critical of President Biden during his  
9 entire administration?

10 A. I've also been critical of President Trump.

11 Q. I agree. When you have a core set of values  
12 and perspectives and I think you stick to them, okay?  
13 And you share them. Mr. Stewartson also has strong  
14 convictions and beliefs. I don't believe you two see  
15 eye to eye on much of anything, but he shares them, much  
16 as you do, but you believe he's wrong, right?

17 A. I believe he's lying.

18 Q. He believes you lie on your page, right?  
19 That's kind of where we are in the political discourse.  
20 But do you agree that we -- all sides need to be careful  
21 about how they express those disagreements to avoid it  
22 escalating to political violence?

23 MR. FRENCH: Object to form.

24 THE WITNESS: Restate your question. I don't  
25 totally understand what you're asking.



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1 BY MR. WHISENHUNT:

2 Q. Not a problem. Sometimes lawyers ask really  
3 terrible questions. That's okay.

4 Would you agree with me that while you post  
5 what you believe in and Mr. Stewartson and others post  
6 what they believe in, that there is an importance in  
7 making sure that we avoid escalating opinions and  
8 debates from in -- from becoming violent?

9 MR. FRENCH: Object to form.

10 THE WITNESS: I mean, we don't want to raise  
11 the rhetoric to the point where somebody is going to  
12 become violent because of something that you said.  
13 And -- and in Stewartson's case, he has said things  
14 that are so, so dangerous and attacked me so  
15 personally. You know, if I attack a policy issue,  
16 you know, or a -- or a viewpoint from a person who I  
17 -- who I think is, you know, a high-profile person  
18 and in a position to make a decision about things  
19 that are going to affect the entirety of the country  
20 versus somebody who is spewing lies about me  
21 individually, and frankly, my family. That -- that  
22 -- that's -- that's like beyond the pale.

23 BY MR. WHISENHUNT:

24 Q. You mentioned earlier that following your  
25 career in the United States Army, you retired, and you



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1 took a long vacation?

2 A. Yep.

3 Q. At the end of that vacation, were you forced  
4 into public life again? Were you forced to take on a  
5 public, high-profile role, or was that a choice?

6 A. It was a choice.

7 Q. And did you have the benefit, when you chose  
8 to put yourself into that public personality role, of  
9 knowing your family was going to be brought into it with  
10 you?

11 MR. FRENCH: Object to form.

12 THE WITNESS: Yeah. I mean, I -- yes, but now  
13 we know. You know, I didn't choose to be viciously  
14 and brutally attacked, not only by my own  
15 government, which is very evident now. But because  
16 of that, people like Stewartson jumped on that  
17 bandwagon and took on whatever they wanted to take  
18 on and attacked me viciously, and my family, and  
19 caused me great harm.

20 Now, he didn't need to do that. He didn't need  
21 to decide to do that, but he did. His lies, his  
22 lies, not just his speech. You know, his lies have  
23 -- have done great harm and it's still damaging  
24 because he's still out there doing it.

25 BY MR. WHISENHUNT:



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1 Q. When Jim Stewartson posts, "Mike Flynn is a  
2 Nazi," I understand your position is that is a lie?

3 A. Yes.

4 Q. Is that correct?

5 A. Yes.

6 Q. Okay. Do you interpret that statement to mean  
7 that Jim Stewartson is saying that you were a member of  
8 the German National Social Workers Party in the late  
9 1920s through 1940?

10 A. I don't know what's going through his head.

11 Q. Okay. You weren't born at that point, right?

12 A. Right.

13 Q. Okay. So clearly it cannot be intended to  
14 mean you are literally a member of the Nazi Party?

15 MR. FRENCH: Object to form.

16 THE WITNESS: Is that a statement?

17 BY MR. WHISENHUNT:

18 Q. Right. Would you agree with that? He's not  
19 suggesting that before you were born, you were a member  
20 of the Nazi Party?

21 MR. FRENCH: Object to form.

22 THE WITNESS: Yeah. I don't know what he -- I  
23 don't know what he's intending or what he's, you  
24 know, what he's getting at. I really don't. Other  
25 than -- other than he's lying.



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1 BY MR. WHISENHUNT:

2 Q. Okay. You mentioned earlier some familiarity  
3 and I'm sure as a career military officer, you had war  
4 history as a matter you learned and studied. I don't  
5 know if you attended the War College in Carlisle or not,  
6 but I'm sure during the course of your career you  
7 learned extensively about past military campaigns and  
8 the political turmoil that led to and resolved wars; is  
9 that right?

10 A. Sure.

11 MR. FRENCH: Object to form.

12 BY MR. WHISENHUNT:

13 Q. Okay. Part of the history of Nazi Germany was  
14 the seizure of power, the suspension of rights, the  
15 assertion of martial law.

16 Do you believe your comments in the December  
17 of 2020 and January of 2021, seemingly sharing a view,  
18 if not advocating for, at least contemplative of martial  
19 law, could give someone the impression that you were an  
20 advocate for those same types of fascist ideas?

21 MR. FRENCH: Object to form.

22 THE WITNESS: I mean, they have to show me what  
23 I said.

24 BY MR. WHISENHUNT:

25 Q. Okay.



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1 A. In the context of -- of -- of what I -- when I  
2 said it. But if you're asking if I made factual  
3 statements about different things, you know, then I -- I  
4 -- I, you know, problem -- I -- I may have. I probably  
5 did make factual statements about certain things, but  
6 you'd have to show me the context of what you're talking  
7 about because you're -- you're -- you're stating things  
8 that may not be totally accurate.

9 Q. Okay. One of the other things that led to the  
10 rise of the Nazi Party was attacks on the media and  
11 press.

12 A. Uh-huh.

13 Q. Have you ever challenged the legitimacy or  
14 motivations of the mainstream media?

15 MR. FRENCH: Object to form.

16 THE WITNESS: Define mainstream media.

17 BY MR. WHISENHUNT:

18 Q. You have repeatedly, on your X or Twitter  
19 handle, referred to mainstream media. You've frequently  
20 referred to the mainstream media as being fake news.

21 A. Okay.

22 Q. So when you refer to the mainstream media on  
23 your post, what do you mean?

24 A. I mean the -- the major networks, the major  
25 cable networks, other -- other platforms that are part



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1 of those -- those networks.

2 Q. When you suggest that they are fake --

3 A. Uh-huh.

4 Q. -- given the context that the rise of Nazi  
5 power also included efforts to diminish the reliability  
6 of the press to the public, do you think someone could  
7 misinterpret what you're doing for being an example of  
8 fascism?

9 MR. FRENCH: Object to form.

10 THE WITNESS: Yeah. Again, you're -- you're --  
11 you're taking a leap without the context behind it.  
12 I mean, you're -- you're making a statement of some  
13 either belief that you have or something that you're  
14 -- an -- an issue you're getting at without giving  
15 me the context of when I say it's fake news because  
16 it might -- I may have posted something that was  
17 actually, you know, called out and be -- and -- and  
18 was a lie by the mainstream media.

19 BY MR. WHISENHUNT:

20 Q. Okay. Have there been instances where you  
21 believe the mainstream media was dishonest or spreading  
22 information that was false, in your opinion?

23 A. Yes, my opinion, yes.

24 Q. Okay. And when that has occurred, have you  
25 from -- in some instances, said so on your post or at



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1 speeches or otherwise?

2 MR. FRENCH: Object to form.

3 THE WITNESS: I mean, I -- you know, I'd have  
4 to go back and look at all the different events,  
5 but --

6 BY MR. WHISENHUNT:

7 Q. Another aspect of the rise of Nazi power in  
8 Germany was vitriol and criminalization of political  
9 opponents.

10 A. Uh-huh.

11 Q. Okay? So if we go back to your RNC speech on  
12 July 18th of 2016, you led the entire arena in a chant  
13 of, "Lock her up."

14 A. Uh-huh.

15 Q. Who are you referring to?

16 MR. FRENCH: Object to form first of all, I --  
17 as to the discourse leading into your question.

18 BY MR. WHISENHUNT:

19 Q. Do you recall speaking at the RNC National  
20 Convention on July 18th of 2016?

21 A. I do.

22 Q. Okay. Do you recall during your speech  
23 leading a chant of, "Lock her up"?

24 A. I -- I remember the event, yes.

25 Q. Okay. Who were you speaking of?



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1 A. I was speaking of, at the time, Hillary  
2 Clinton.

3 Q. Okay. The political opponent of the  
4 Republican candidate for president?

5 A. Yes.

6 Q. A sense of nationalism is often accompanying  
7 the idea of fascism and oftentimes reflects a sense of  
8 homogeny within a community or culture. The United  
9 States is fairly diverse. Do you think that's a good  
10 thing?

11 MR. FRENCH: Object to form and the entire  
12 discourse leading into this, I --

13 MR. WHISENHUNT: Sure.

14 MR. FRENCH: -- discuss each point. And you're  
15 making statements in a speech without asking the  
16 question related --

17 MR. WHISENHUNT: Yes. I'm asking your --

18 MR. FRENCH: -- to this case.

19 MR. WHISENHUNT: Right.

20 MR. FRENCH: Tell me how whether or not the  
21 historical reference and so forth relates to this  
22 case? I -- where are we going with this?

23 THE WITNESS: Yeah.

24 BY MR. WHISENHUNT:

25 Q. Do you recall posting that fear of Muslims is



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1 rational?

2 MR. FRENCH: Object to form.

3 THE WITNESS: I don't recall it, but I -- but  
4 I'm sure I did. I mean, you -- you tell -- you're  
5 -- you're -- you're telling me things that I've done  
6 so, you know, why don't you keep going ahead and  
7 telling me things that I've done that, you know, and  
8 -- you know, let me know where you're getting at  
9 here.

10 I -- I -- I -- I've been through one of these  
11 before, Craig, and I'm very concerned that -- and I  
12 -- and I -- and I will say it on the record. I'm  
13 very concerned that you're going to use some of this  
14 for -- for some type of media action here.

15 Okay? I just have a feeling that you're --  
16 you're looking for me to answer something that you  
17 can turn over to some of your buddies in, you know,  
18 either in other law firms or in the media. I'm very  
19 concerned about that. So I just want that to be on  
20 the record.

21 MR. FRENCH: Which again, it began with my  
22 statement about the protective order being in place.

23 THE WITNESS: Right.

24 MR. FRENCH: This type of, you know, harassment  
25 and provocation is one of the reasons why it's being



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1 conducted in this manner.

2 THE WITNESS: Right. Exactly.

3 BY MR. WHISENHUNT:

4 Q. The idea that you shared of Muslim -- of fear  
5 of Muslims being rational, do you understand how someone  
6 could interpret that? Whether you intended it this way  
7 or not, but could interpret that as a fascist type of  
8 ideology?

9 A. I don't understand that.

10 MR. FRENCH: Let me, again, objecting to -- on  
11 the same grounds. You're just trying to make some  
12 kind of score here. You're not actually addressing  
13 questions to the issues in the case.

14 THE WITNESS: Right.

15 MR. FRENCH: You know, let's get back on track.

16 MR. WHISENHUNT: This is an issue of the case,  
17 Mr. French, and if you keep interrupting me, we're  
18 going to have a problem.

19 MR. FRENCH: Well, I understand, but this is  
20 exactly why we got to this point and, you know,  
21 you're trying to pick something out here that I  
22 don't know what you intend to do with it. But this  
23 was the concern that we've had all along about it.

24 And --

25 MR. WHISENHUNT: The evidence at trial is going



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1 to include these statements --

2 MR. FRENCH: The issues are whether or not this  
3 gentleman was defamed by your client and what he did  
4 and said and not the world or even Ms. -- General  
5 Flynn's comments and what those actions or those is  
6 not relevant to the case. If you --

7 MR. WHISENHUNT: Mr. French, you're going to  
8 have to -- you're going to have to stop. These  
9 questions go directly to your --

10 MR. FRENCH: -- record of it because this is  
11 exactly what we had told and expected that you would  
12 be trying to do with this discovery process. And in  
13 fact, your client even said that that was his goal.

14 So, you know, I'm fine making it on the record  
15 and allowing the Court to look at this and realize  
16 exactly what's going on as proof of what we  
17 expected. And you know, were afraid you were going  
18 to do.

19 So if you have questions about the case, we're  
20 -- we'll hear, we'll answer the questions about  
21 that. But this type of, I'm going to make speeches  
22 and try and grab some kind of, you know, clickbait  
23 or whatever. That's not what we're here for.

24 MR. WHISENHUNT: No, this is a preview of what  
25 the trial testimony is going to look like.



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1 MR. FRENCH: And --

2 MR. WHISENHUNT: This is --

3 MR. FRENCH: -- we'll have a judge sitting  
4 there telling you to stop. That's the difference.

5 MR. WHISENHUNT: No.

6 MR. FRENCH: And that's what judge made the  
7 point --

8 MR. WHISENHUNT: I promise you --

9 MR. FRENCH: He wasn't available to be here to  
10 sit here and tell you to stop doing this harassment.  
11 That's why we have the protective order. And I'm  
12 going to assert that --

13 MR. WHISENHUNT: Great.

14 MR. FRENCH: -- if you keep going forward into  
15 it. I mean, we're going to answer your questions,  
16 but let's not deal with this. We're not here for  
17 you to make some kind of headline. We're here to  
18 deal with this case. Let's get into that.

19 MR. WHISENHUNT: This is the case, Mr. French,  
20 because this case --

21 MR. FRENCH: Okay.

22 MR. WHISENHUNT: -- involves my client's  
23 reasonable belief that your client's conduct and  
24 statements publicly and repeatedly are a form of  
25 fascism.



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1 MR. FRENCH: And -- and

2 MR. WHISENHUNT: And he's allowed to hold the  
3 opinion that he does.

4 MR. FRENCH: We'll get into your client's  
5 beliefs when we depose him on Thursday.

6 MR. WHISENHUNT: Absolutely.

7 MR. FRENCH: And he can say all of that, but  
8 you're asking this gentleman to provide you some  
9 kind of, what, thought process of your client. That  
10 can't happen. That's never going to be relevant.  
11 It's never going to be entered into the court at a  
12 trial, okay?

13 Your client can talk all he wants about why he  
14 thought he was okay to go ahead and make these lies.  
15 He can explain that all he wants, but you can't ask  
16 this witness why he -- what he thinks why your  
17 client lied.

18 MR. WHISENHUNT: All right. Are you -- are you  
19 done?

20 MR. FRENCH: Yeah, I am. For now.

21 BY MR. WHISENHUNT:

22 Q. All right. Sir, do you recall ever sharing or  
23 posting links concerning Pizzagate? Do you know what  
24 that is?

25 A. I do.



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1 Q. Okay. What do you recall of it?

2 A. Not much, to be honest with you. I just --  
3 sitting here today, had -- it had to do with some type  
4 of child sex trafficking either operation or event.

5 Q. Okay. To the best of your knowledge, did it  
6 ever involve Hillary Clinton?

7 A. I don't know.

8 Q. Okay. Do you recall ever posting anything  
9 suggesting that it did?

10 MR. FRENCH: Object to form.

11 THE WITNESS: Yeah. I -- I don't recall  
12 whether I did or not.

13 BY MR. WHISENHUNT:

14 Q. Do you ever delete any of the things you post?

15 A. I don't know. I mean, I don't -- I don't  
16 recall. I -- I -- I -- if I did, it would be unusual or  
17 rare.

18 Q. Okay. If you posted something and later found  
19 out maybe you were mistaken or your position evolved, is  
20 that a circumstance you might delete something?

21 A. I'm just trying to remember whether -- whether  
22 I -- I know I have deleted things that were -- that were  
23 incorrect, but not much.

24 Q. By bringing a defamation action, you have put  
25 your own character at issue in this case. You've



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1 suggested that your reputation and your character was  
2 harmed because of these four things Mr. Stewartson said  
3 about you on the internet, right?

4 MR. FRENCH: Object to form.

5 BY MR. WHISENHUNT:

6 Q. Do your public statements, whether on social  
7 media or through speaking engagements, express to the  
8 world or the public at large who you are and what your  
9 character is?

10 MR. FRENCH: Object to form.

11 THE WITNESS: I don't know what the world at  
12 large thinks.

13 BY MR. WHISENHUNT:

14 Q. Okay. I guess an easier way to put this there  
15 is are you being your authentic self when you take the  
16 stage and you speak or when you share things on social  
17 media? Is that who you are?

18 MR. FRENCH: Object to form.

19 THE WITNESS: What do -- what do you mean, my  
20 authentic self? What -- what are you talking about?

21 BY MR. WHISENHUNT:

22 Q. Years ago, Stephen Colbert had a show called  
23 the Colbert Report on Comedy Central.

24 A. I didn't watch -- I don't know who Stephen --  
25 the name Stephen Colbert. It's not somebody I watch,



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1 so --

2 Q. Right. He was a parody of a conservative  
3 mentality, right? He said all sorts of things that he  
4 didn't truly believe, right? There's plenty of that all  
5 over the place on the internet. There's lots of money  
6 probably to be made that way.

7 What I'm asking is, are you: When you take the  
8 stand, representing your true actual beliefs, or are  
9 these adopted beliefs for a persona or character or  
10 profit that maybe don't reflect what you truly believe?

11 Are you being true to yourself, or is this a  
12 show?

13 MR. FRENCH: Object to form.

14 THE WITNESS: I don't understand your question.  
15 I don't understand the question at all. May you ask  
16 me -- when I say something, do I -- do I believe  
17 what I say? Yeah, I -- if I say something, I  
18 believe what I say, typically. People know me, that  
19 I'm a -- you know, know me to be a very serious  
20 person, very forthright person, very honest.

21 BY MR. WHISENHUNT:

22 Q. We spoke about this a little bit ago, I don't  
23 know if you had an opportunity to look at it, probably  
24 not, but at that 2021 Reawaken America rally, the full  
25 quote was, "If we are going to have one nation under



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1 God, which we must, we have to have one religion. One  
2 nation under God and one religion under God."

3 Do you recall saying that at that rally?

4 A. I don't recall it, but I -- I know -- I know  
5 about it.

6 Q. Okay. Is that sentiment what you believe?

7 A. It's not really, no. I -- I know that I spoke  
8 out of -- out of -- you know, as I was, you know, again,  
9 introducing a -- a Christian rock band. That was not --  
10 that was not -- you know, it's not what I meant in that  
11 case.

12 You know, I don't believe we need to have one  
13 religion in this country. I don't believe that. I do  
14 believe that our country was founded on -- on Judeo-  
15 Christian principles and values. I've said that many  
16 times.

17 Q. During the lead up to the 2016 presidential  
18 election, there came a point where quite a number of e-  
19 mails from Hillary Clinton's campaign manager and the  
20 Democratic National Committee were leaked. Do you  
21 recall that occurring?

22 A. I --

23 MR. FRENCH: Object to form.

24 THE WITNESS: -- yeah, I don't really --

25 MR. FRENCH: What's the relevance?



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1 THE WITNESS: -- yeah, I mean, I -- don't know.

2 MR. FRENCH: And again, where are we going with  
3 this, other than you have somebody --

4 MR. WHISENHUNT: Okay.

5 MR. FRENCH: -- here that you want to harangue  
6 and harass about things that are political in  
7 nature. What -- again, where are we going with this  
8 as far as in relation to this lawsuit? I think that  
9 would be a real good, you know, explanation the  
10 Court would like to hear.

11 BY MR. WHISENHUNT:

12 Q. And when you have --

13 A. I mean, are you thinking that you're in the  
14 Department of Justice or something? Are you litigating  
15 the -- the Mueller investigation, the Durham  
16 investigation, you know, the current investigations that  
17 are ongoing? Is that what you're trying to do here?

18 I mean, is -- you know, what is it that you're  
19 getting at here, Craig? Because it's, like -- you know,  
20 you're going back into, like -- I -- I just -- I don't  
21 understand this, you know. And so be -- you know,  
22 that's -- that's -- I just feel like you're -- you're  
23 digging into something that -- you know, that you're  
24 going to -- I -- I don't know what you're going to do  
25 with it. You know, take things out of context.



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1 Q. I don't know what the --

2 A. I mean, you -- are you sorry that Jim Comey  
3 got indicted? I mean, I don't know -- you know, how  
4 about if you answer that question, although you're not  
5 -- I guess I'm here to answer the questions, but I mean,  
6 are you sorry that -- that these people got caught  
7 subverting the U.S. Government?

8 Q. I would genuinely enjoy having that  
9 conversation with you when we're done with this. But  
10 for right now, I want to keep us to this, but I think  
11 you and I could have a really interesting discussion  
12 about what happened to you and what's happening to them.

13 MR. FRENCH: Let's do a great job of keeping it  
14 to this, which is the lawsuit -- this case.

15 BY MR. WHISENHUNT:

16 Q. But let's stay to this, because one of the  
17 four statements at issue in this case has strong  
18 overtones to antisemitism and the Holocaust. Right.  
19 And your complaint alleges that any suggestion at all  
20 that you may want a second Holocaust is a lie, right?

21 A. I believe that's a lie, yes.

22 Q. Right. Certainly, you're not -- you don't  
23 believe there should be one, right? No one -- that's  
24 not a belief you've ever held or said out loud, right?

25 A. Right.



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1 Q. Back when all of those e-mails leaked, do you  
2 recall tweeting out, quote, "The USSR is to blame! --  
3 not anymore, Jews, not anymore." And then you ended the  
4 quote. Do you remember posting that?

5 A. I don't.

6 Q. Okay. You gave an interview later after  
7 having deleted it and offered sincere apologies for  
8 sharing that. But as -- and I would like to give you  
9 credit for that part of it, but you don't remember the  
10 original statement?

11 A. I don't.

12 Q. You recently came under some scrutiny because  
13 of other comments you made concerning the Holocaust and  
14 the willingness of mothers put their children on trains  
15 and the failure of concentration camp individuals to  
16 rise up against the few guards that were sometimes  
17 there. Do you recall those comments?

18 MR. FRENCH: Object to form. Again, relevance.

19 THE WITNESS: Yeah. Exactly -- you know, what  
20 were the exact comments?

21 BY MR. WHISENHUNT:

22 Q. Do you remember generally talking -- I mean,  
23 this was, I would imagine, for you apparently a big deal  
24 because it was all over the news for about a week where  
25 they were suggesting that you were an antisemite and I



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1 don't believe that you are, but do you remember giving a  
2 speech where you talked about the Holocaust?

3 MR. FRENCH: Object to form.

4 THE WITNESS: Yeah, I don't -- I don't recall.  
5 I mean, you have to show me the -- the -- whatever  
6 it was in the -- in the context.

7 BY MR. WHISENHUNT:

8 Q. I'm going to skip onto our third of the -- of  
9 those four claims. I feel like we probably have pretty  
10 thoroughly discussed the first and second. Do you  
11 recall when you first met Jack Posobiec?

12 A. I don't.

13 Q. Do you believe it would've occurred while you  
14 were still active duty or sometime thereafter?

15 A. That's a big window.

16 Q. Well, you retired in 2014. Is that -- do I  
17 have that year right?

18 A. That's right.

19 Q. Okay. Do you have any specific recollection  
20 of having -- and I don't mean like an incidental, you  
21 guys both were in the same room sometime, but like  
22 actually meeting him prior to your retirement in 2014?

23 A. I don't recall. No.

24 Q. It appeared that you've gone on his show a  
25 couple of times. It appears that you and he have



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1 developed I don't know if it's a friendship, but at  
2 least a professional association with one another now;  
3 is that accurate?

4 A. It's accurate. Yeah.

5 Q. Okay. And to the extent that there was any  
6 professional I don't even think alignment would be the  
7 word, but professional association of one another. He  
8 was with the Office of Naval Intelligence in 2012, which  
9 is one of the organizations that reports to the Director  
10 of Intelligence, the DIA, that you led; is that correct?

11 MR. FRENCH: Object to form.

12 BY MR. WHISENHUNT:

13 Q. The DIA oversees quite a few. So if can you  
14 tell me a little bit more about the breadth of work the  
15 DIA does?

16 A. Yeah. I mean, you know -- well, ask a  
17 specific question, I mean, because it's -- that's a huge  
18 organization.

19 Q. Sure. And you led it for two years, right?  
20 That was your last duty assignment?

21 A. Yeah.

22 Q. Okay. I've heard it described a number of  
23 ways. Would you describe -- or would you agree that a  
24 description of the DIA is being more or less a  
25 consolidation and clearing house of all of the military



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1 intelligence organizations, like a centralized hub of  
2 all of the military intelligence? Is that an accurate  
3 description of it?

4 MR. FRENCH: Object to form.

5 THE WITNESS: Not necessarily. No, it's not.

6 BY MR. WHISENHUNT:

7 Q. Okay. Okay. Can you tell me where I'm wrong?

8 A. What is -- what's the specific issue that you  
9 have? What's the specific question about Jack Posobiec  
10 and -- and what --

11 Q. Well, I -- you acknowledged earlier that Jack,  
12 while stationed in Guantanamo, would've been under the  
13 auspices of the DIA.

14 A. I acknowledged that I've heard him say that he  
15 was at Guantanamo. And during that time, he was part of  
16 DIA and that's -- but I -- because I've heard him say  
17 that.

18 Q. Okay. Do you know what his duty assignment  
19 entailed? What his mission details were? Anything  
20 related to what his role in Guantanamo was?

21 A. I don't.

22 Q. You never had any direct involvement with what  
23 was ongoing in Guantanamo, outside of maybe analyst side  
24 with DIA, right? You weren't mission command or  
25 anything like that to Joint Task Force Guantanamo?



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1 A. That's -- generally, yeah, that's true, you  
2 know.

3 Q. Right. Earlier in your career, when you were  
4 a -- I believe a full bird colonel in Afghanistan as the  
5 head of our military intelligence in Afghanistan, the  
6 al-Qahtani plan of grabbing high-value detainees, some  
7 of those individuals would later go on to Guantanamo; is  
8 that correct?

9 MR. FRENCH: Object to form.

10 THE WITNESS: I don't know what you're getting  
11 at. I don't know what you're talking about.

12 BY MR. WHISENHUNT:

13 Q. Are you familiar with the al-Qahtani plan for  
14 seizing high-value enemy combatants in Afghanistan?

15 MR. FRENCH: I object. Again, what --

16 THE WITNESS: I'm not.

17 MR. FRENCH: -- what -- what's the purpose of  
18 these questions? How does this relate to your  
19 client's defamatory statements made within the last,  
20 what, four years about events and comments that this  
21 gentleman apparently made in whatever context in,  
22 you know, the few years preceding and now you're  
23 going back to that period of time. What's the  
24 purpose of this? I don't understand what you're  
25 trying to get into. Are you trying to get into



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1 information that is shared within the government  
2 about what occurred in those missions?

3 MR. WHISENHUNT: The very --

4 MR. FRENCH: And that's certainly -- that it's  
5 certainly not relevant at all to this case. And if  
6 you want to hold that and you want to send a -- you  
7 know, and request the judge to allow you to ask  
8 questions about what occurred in Afghanistan during  
9 various missions that this man wasn't even  
10 necessarily involved in, you know, that's fine. We  
11 can hold that over and go ask the judge if you think  
12 you should ask those questions.

13 BY MR. WHISENHUNT:

14 Q. Right. Sir. Your role in Afghanistan in the  
15 early 2000s involved the capturing of enemy combatants  
16 and securing them for intelligence gathering purposes,  
17 correct?

18 MR. FRENCH: Same objection.

19 THE WITNESS: Not really. No.

20 BY MR. WHISENHUNT:

21 Q. So the repeated IG reports and things, you --

22 A. You're making a very -- you're making a very  
23 -- very broad, broad statement. So -- and you're not  
24 asking a question other than saying correct. I mean,  
25 correct about a very broad statement.



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1 Q. Okay. Are you testifying today that you had  
2 no involvement in the capture of enemy combatants and  
3 securing them to sites for investigative and  
4 intelligence purposes?

5 MR. FRENCH: All right. I'm going to object.  
6 Again, he's here to testify about the issues in this  
7 case. Tell me --

8 MR. WHISENHUNT: This is an issue in the case,  
9 Mr. French. Please stop interrupting then.

10 MR. FRENCH: -- what he did -- what he did in  
11 Afghanistan -- you know, you're right. And I've  
12 been very patient. We've all been very patient, but  
13 you are going to areas that have nothing to do about  
14 this case. Now, if you want to --

15 MR. WHISENHUNT: You're -- Mr. French --

16 MR. FRENCH: -- go and ask -- if you want to  
17 ask the Court right now and call the Court and say,  
18 Judge, I want to ask questions about what this  
19 gentleman did in Afghanistan 20 years ago, and I  
20 want to tell you how it's relevant, when it's not  
21 relevant to any of the issues of the statements that  
22 are going to trial on, I'm happy to wait and we can  
23 get the judge on the call. I mean, do that right  
24 now. Otherwise, I am shutting it down. This is  
25 nothing other than more harassment and provocation



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1 on your part. Okay.

2 MR. WHISENHUNT: Mr. French, at issue in this  
3 case is the truthfulness of the statements made by  
4 Mr. Stewartson or the reasonableness of their being  
5 made.

6 MR. FRENCH: Right --

7 MR. WHISENHUNT: And al-Qahtani --

8 MR. FRENCH: -- and the actual statements he  
9 made --

10 MR. WHISENHUNT: Right.

11 MR. FRENCH: -- and that are at issue in this  
12 case. And none of this involve his --

13 MR. WHISENHUNT: The reasonableness of them --

14 MR. FRENCH: -- tour of duty in Afghanistan.

15 MR. WHISENHUNT: Except they do. And if you  
16 were more familiar with the military history or  
17 what's going on in Guantanamo, you would realize  
18 that the individuals that Mr. Flynn took into  
19 custody and extradited through extraordinary  
20 rendition processes throughout the world under his  
21 obligations as the head of military intelligence in  
22 Afghanistan, were repeatedly and brutally tortured.  
23 Not only abroad, but also at Guantanamo, which has  
24 been the subject of tremendous United States Supreme  
25 Court litigation and well-published opinions where



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1 he is specifically named. So that's --

2 MR. FRENCH: All right --

3 THE WITNESS: You're -- you're -- I'm going to  
4 tell you -- you're wrong about that. And now you're  
5 lying because you didn't do your research because I  
6 -- you're lying about that. So be very careful what  
7 you're saying there, Attorney, because you're --  
8 you're -- you're making -- you're making a false  
9 allegation on -- during a deposition and that is a  
10 false -- that is a false claim that you just made.

11 BY MR. WHISENHUNT:

12 Q. So your testimony here today is that you were  
13 not involved in the gathering of individuals or enemy  
14 combatants in securing them for intelligence gathering  
15 purposes while in Afghanistan?

16 A. Well, the -- for the court reporter, read back  
17 exactly what he just said before when he mentioned the  
18 word rendition?

19 I'm going to tell you, you just made a false  
20 allegation and I ain't going to put up with this stuff.  
21 I am not -- I know exactly what my responsibilities were  
22 and what I did -- to -- to --

23 Q. Then tell us.

24 MR. FRENCH: No, no, more importantly. Ask him  
25 questions about the statement at issue of whether or



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1 not he hired Mr. Posobiec --

2 THE WITNESS: Right.

3 MR. FRENCH: -- to conduct torture. That is  
4 the issue. Ask all the questions you want about  
5 that. But whether or not there was other involvement  
6 and what missions were run by the government,  
7 whoever else, and all this fantasy you have, that's  
8 -- you know, that is irrelevant, all right.

9 Ask him about the statement that is issue here,  
10 the defamatory statement about whether or not he  
11 hired this individual to conduct torture. You can  
12 ask him questions about that. All this other  
13 background stuff is just something you want to  
14 harass him about and try and get some kind of  
15 statement and for your client to go out and say,  
16 look, we got him to admit or deny about this, that,  
17 and the other, which is exactly what your client  
18 expressly has said he wanted to do with this  
19 process.

20 And I'm -- I invite you if you want to go into  
21 that area, call the judge and tell him you want to  
22 ask about things that predate so far and don't have  
23 to do with the defamatory statement that is going to  
24 trial. I invite you to call the judge and ask him  
25 that.



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1 MR. WHISENHUNT: Mr. French, are you  
2 instructing then your client not to answer my  
3 question?

4 MR. FRENCH: You can keep asking, but I'm going  
5 to keep giving the same objection if you keep  
6 bringing up irrelevant things, but I'm not shutting  
7 the deposition --

8 MR. WHISENHUNT: I appreciate that you --

9 MR. FRENCH: If you want to ask questions about  
10 things that predate anything to do with the  
11 allegations of this complaint, you're going to have  
12 to get a judge to tell him to answer those  
13 questions, okay?

14 MR. WHISENHUNT: So we'll reserve on that line  
15 of questions.

16 MR. FRENCH: Great.

17 MR. WHISENHUNT: We'll bring it before the  
18 judge.

19 MR. FRENCH: Great, or you could do it now.

20 MR. WHISENHUNT: I don't know that the judge is  
21 available, and I'm fighting a clock because I have  
22 more important matters, I have to get to at 3:30.

23 MR. FRENCH: Okay, well.

24 THE WITNESS: Then get to the questions that  
25 you need to get answered.



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1 MR. FRENCH: Yeah. Get to the ones that are  
2 important to this case.

3 MR. WHISENHUNT: Oh, while you may not  
4 appreciate the defense's theory of the case, I  
5 assure you all of this matters.

6 MR. FRENCH: I fully appreciate the defense  
7 when -- what they're trying to do. I didn't even  
8 have coffee this morning.

9 BY MR. WHISENHUNT:

10 Q. Sir, are you familiar with the phrase, where  
11 we go one, we go all?

12 A. Yes.

13 Q. Okay. And what is that from?

14 A. I understand that's a -- a -- a phrase that  
15 has something to do with JFK.

16 Q. Okay. Are you familiar with any association  
17 of that phrase with QAnon?

18 A. I am generally not, but I understand it is.  
19 People have attached the two.

20 Q. Okay. Have you ever used that phrase?

21 A. Yes, I have.

22 Q. Okay. Are you familiar with the hashtag  
23 TakeTheOath?

24 A. I am.

25 Q. And what does that refer to?



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1 A. Take the oath of office, you know, the -- the  
2 constitutional oath of office.

3 Q. Are you familiar with it being used by QAnon  
4 supporters to advocate for the oath, where we go one, we  
5 go all?

6 A. Not generally, no.

7 Q. After you resigned or were removed as National  
8 Security Advisor for President Trump during his first  
9 administration, you became the focus of a ongoing  
10 criminal investigation, right? On December 1st of 2017,  
11 you plead guilty in federal court to one felony count;  
12 is that true?

13 A. I believe that is. I believe that's the date.

14 Q. Later you received a presidential pardon of  
15 that crime, correct?

16 A. I -- after my case was dismissed, actually.

17 Q. Okay. You also did receive a presidential  
18 pardon?

19 A. Eventually.

20 Q. Okay. And you accepted that presidential  
21 pardon?

22 A. I did.

23 Q. Earlier, you mentioned having had past  
24 business relationships with businesses like Adobe, SAIC.  
25 There were several others.



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1 A. Uh-huh.

2 Q. And the dates you recalled were 2015, 2016,  
3 that timeframe. Does that sound accurate?

4 A. Yeah. For -- for some of those, yes.

5 Q. Okay. Did you do any business with them in  
6 2017 after the guilty plea?

7 A. No.

8 Q. Do you think entering that guilty plea  
9 impacted your reputation?

10 A. I believe it did, yeah. Absolutely.

11 Q. And to be clear, do you think it harmed your  
12 reputation, or did it somehow benefit you?

13 A. It harmed me.

14 Q. Give me just one moment, sir. I'm just trying  
15 to review through the last of my notes, make sure I  
16 didn't forget to ask you anything I wanted to. Oh, Booz  
17 Allen. That was one of the other ones you mentioned,  
18 right, Booz Allen?

19 A. Uh-huh. Palo Alto --

20 Q. And I think --

21 A. -- I don't think I mentioned them. There's a  
22 -- there's some others.

23 Q. Yeah. Booz Allen --

24 A. Speaker -- speakers bureaus that I couldn't  
25 get access to anymore.



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1 Q. Bijan -- is it Kian, Kian? Am I saying that  
2 correctly?

3 A. Right.

4 Q. He was a partner of yours at the Flynn Intel  
5 Group after you retired. He went on to work at Booz  
6 Allen, right, and I guess --

7 A. I --

8 Q. Okay.

9 A. -- I don't know that.

10 Q. Do you recall the last time you worked with  
11 Booz Allen?

12 A. I never really worked with Booz Allen.

13 Q. Okay.

14 A. You know, my -- my time in the military, we  
15 worked with them because they were a contractor in our  
16 organization, but I never actually went to work for Booz  
17 Allen.

18 Q. Got you. Okay. Since your retirement you've  
19 also I think produced a movie?

20 A. A documentary.

21 Q. A documentary?

22 A. Uh-huh.

23 Q. And at least a couple of books, right?

24 A. I have written approximately eight.

25 Q. Okay. That's more than a couple. So eight



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1 books.

2 A. Yeah.

3 Q. You were able to get those published?

4 A. The -- the first one was published before I  
5 went into the administration, and the last one was  
6 published by a publisher just recently, this summer. All  
7 the others I self-published. Well, except a -- a  
8 children's book that I wrote on leadership that was  
9 published by Brave Books, but all the others were self-  
10 published.

11 Q. And what about the movie?

12 A. The movie was done on -- on -- on -- on our  
13 own -- my own -- you know, my own creation, I guess.

14 MR. WHISENHUNT: Okay. Steve, I don't think I  
15 have any other questions. I'm confident there may  
16 be a few things you want to follow up on.

17 MR. FRENCH: Oh, you're talking to me?

18 MR. WHISENHUNT: Yes, sir.

19 MR. FRENCH: Oh, okay. That's Stephen, but --

20 MR. WHISENHUNT: Sorry.

21 MR. FRENCH: -- that's all right. I don't have  
22 any -- Mr. Thurlow, do you have any questions?

23 MR. THURLOW: Not at this time.

24 MR. FRENCH: I have no questions. We will read  
25 as well as the transcript -- are you ordering the



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1 transcript?

2 MR. WHISENHUNT: I mean, we'll probably --

3 MR. FRENCH: Yes? Is that a yes? I'm sorry.

4 You talked over each other.

5 MR. THURLOW: Craig?

6 MR. WHISENHUNT: I'll let you answer, George.

7 MR. THURLOW: Yes, we are ordering.

8 MR. FRENCH: You're going to order? All right.

9 We'll take our copy. Are you expediting? How are

10 you having it delivered? We want it at the same

11 time.

12 MR. THURLOW: How long is regular speed, Madam

13 Court Reporter?

14 THE REPORTER: I believe our policy is seven

15 days.

16 MR. THURLOW: So that would take us to -- I'm

17 just pulling up a calendar because we're up against

18 a trial -- that would be around the 8th of October?

19 Yeah. I think regular speed is fine.

20 MR. FRENCH: Regular speed?

21 MR. THURLOW: Yeah.

22 MR. FRENCH: Okay. Again, I just refer

23 everybody again to the terms of the protective

24 order, that nothing in this deposition is to be

25 discussed, released to anybody else outside of the



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1 Zoom conference until that transcript is provided.

2 And we have the period of time to notify the  
3 Court of all such portions are not to be  
4 disseminated outside of this process and any other  
5 provisions of the protective order that I'm  
6 forgetting at this time.

7 THE VIDEOGRAPHER: Okay. And would anyone like  
8 to order video?

9 MR. THURLOW: Not at this time. I will reserve  
10 on that.

11 MR. FRENCH: Okay. And same. And then if one  
12 is ordered, we need to be provided notice  
13 immediately in order to issue the exact same  
14 instructions according to the protective order.

15 THE VIDEOGRAPHER: Okay. I'll hold on both  
16 videos then. Okay. I think that's all.

17 Off the record. It is 1:38.

18 (Deposition concluded at 1:38 p.m. ET)  
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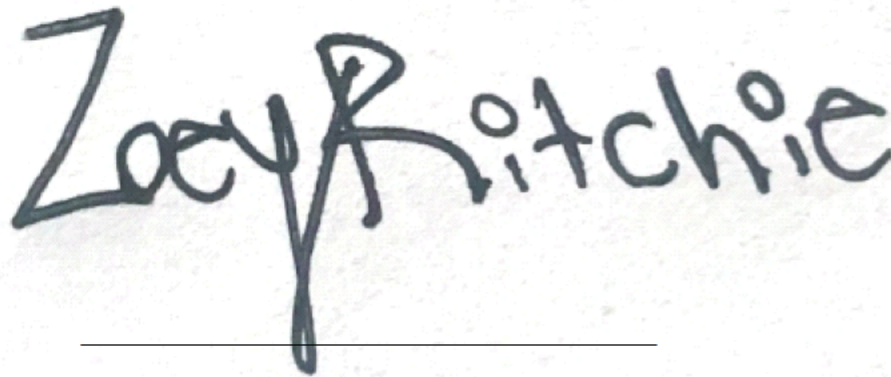
CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF ORANGE

I, the undersigned, certify that the witness in the foregoing transcript personally appeared before me and was duly sworn.

Identification: Produced Identification



ZOEY RITCHIE

Court Reporter, Notary Public

State of Florida

Commission Expires: 06/24/2029

Commission Number: HH 691664



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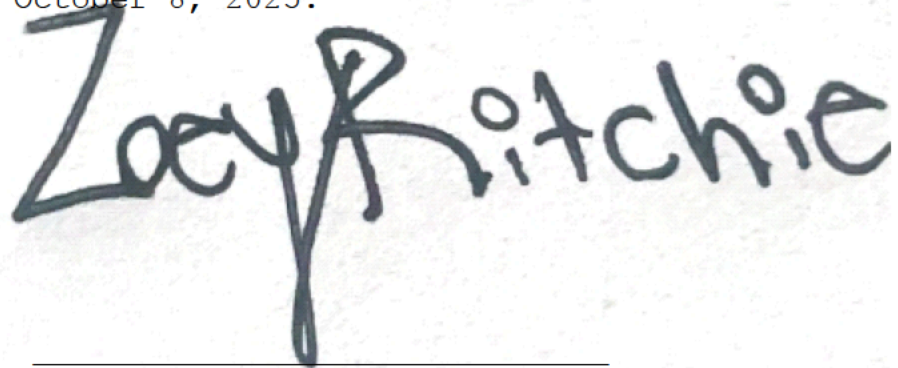
C E R T I F I C A T E

STATE OF FLORIDA)  
COUNTY OF ORANGE)

I, ZOEY RITCHIE, Court Reporter and Notary Public  
for the State of Florida at Large, do hereby certify  
that I was authorized to and did report the foregoing  
proceeding, and that said transcript is a true record of  
the said proceeding.

I FURTHER CERTIFY that I am not of counsel for,  
related to, or employed by any of the parties or  
attorneys involved herein, nor am I financially  
interested in said action.

Submitted on: October 8, 2025.



\_\_\_\_\_  
ZOEY RITCHIE  
Court Reporter, Notary Public



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ERRATA

PAGE	LINE	CHANGE	REASON
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I have read the entire transcript of my deposition taken in the captioned matter or the same has been read to me. I request that the following changes be entered upon the record for the reasons indicated. I have signed my name to the Errata Sheet and authorize you to attach the changes to the original transcript.

_____	_____
Date	NAME





October 08, 2025

Stephen French , Esquire  
Binnall Law Group  
717 King Street  
Suite 200  
Alexandria, VA 22314

RE: Deposition of **Michael T. Flynn** taken on **9/29/2025**  
Michael T. Flynn v Jim Stewartson

Dear Mr. French,

**IMPORTANT NOTICE FOR DEPOSITION TRANSCRIPT READ AND SIGN**

It is suggested that the review of this transcript be completed within 30 days of your receipt of this letter,  
as considered reasonable under Federal Rules\*.

X  **Attorney - Copy of Transcript Enclosed:** Signature of the Deponent is required. Please have the deponent make any corrections/changes necessary on the Errata Sheet ONLY, sign name on the form where indicated. Please return ONLY the original signed Errata Sheet to our offices within 30 days from the date of this memorandum. If you have any questions, please call our offices.

**Attorney - No Copy Ordered:** Since you did not request a copy of the transcript, it will be necessary for the Deponent to call our offices to arrange for an appointment to read and sign the transcript of the Deposition within 30 days of this memorandum.

**Deponent:** At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, attached please find a copy of the transcript and Errata Sheet. Please read the transcript, make any corrections necessary on the Errata Sheet ONLY, sign the bottom of the Errata Sheet, and return it within 30 days from the date of this memorandum. Please call our offices if you have any questions.

**Deponent:** At the time of your deposition, you did not waive your right to read and sign the transcript of your testimony, therefore, it is necessary for you to come to our offices to read and sign same. Please call Milestone Reporting Company to arrange for an appointment at your earliest convenience.

**The errata sheet(s) and Notary Certificates(s) have not been received by our office in the allotted time period. The original transcript has been filed with the appropriate court or counsel.**

Thank you for your attention to this matter.

No. 410449

Reporter:

cc: George A.D. Thurlow, Esquire.  
Craig Whisenhunt, Esquire

Waiver:

I, Michael T. Flynn , hereby waive the reading and signing of my deposition transcript.

\_\_\_\_\_  
Deponent Signature

\_\_\_\_\_  
Date

\*Federal Civil Procedure Rule 30 (e) / Florida Civil Procedure Rule 1.310 (e)

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA  
CIVIL DIVISION**

Michael T. Flynn,  
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson,  
Defendant.

\_\_\_\_\_ /

**DEFENDANT JIM STEWARTSON'S NOTICE OF FILING PLAINTIFF'S DEPOSITION  
TRANSCRIPT**

Defendant, JIM STEWARTSON, by and through undersigned counsel, hereby gives Notice of Filing the transcript from the deposition of Defendant, JIM STEWARTSON, taken on October 2, 2025.

Dated: February 15, 2026

**/s/ George A.D. Thurlow**  
George A.D. Thurlow, Esquire  
FBN 1019960

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing document was served upon Stephen French, Esquire and Jared Roberts, Esquire via Florida E-Filing Portal on this 15<sup>th</sup> day of February, 2026.

**/s/ George A.D. Thurlow**  
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[tmccreary@rahdertlaw.com](mailto:tmccreary@rahdertlaw.com)  
Attorneys for Defendant, STEWARTSON

1           IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
2                    IN AND FOR SARASOTA COUNTY, FLORIDA  
3                            CIVIL DIVISION

4 \_\_\_\_\_  
5 MICHAEL T. FLYNN,

6                    Plaintiff,

7                    v.

Case No.:

8 JIM STEWARTSON, et al.,

2023 CA 004264 NC

9                    Defendants.

10 \_\_\_\_\_

11                            VIDEOTAPED DEPOSITION

12 \_\_\_\_\_

13  
14 WITNESS:                    JAMES ARTHUR STEWARTSON

15 DATE:                        Thursday, October 2, 2025

16 START TIME:                 1:04 p.m., ET

17 END TIME:                    3:13 p.m., ET

18 REMOTE LOCATION:            Remote Legal platform

19 PROCEEDINGS OFFICER:        Audrey Hall, CDR-3539

20 JOB NO.:                     41483

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A P P E A R A N C E S

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By: GEORGE A. D. THURLOW, ESQUIRE

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Appearing for Defendant, Jim Stewartson

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A P P E A R A N C E S (Continued)

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1 P R O C E E D I N G S

2 THE PROCEEDINGS OFFICER: Okay. We are  
3 now on the record. Today's date is October 2, 2025, and  
4 the time is approximately 1:04 p.m., Eastern Time.

5 My name is Audrey Hall, and I'm the  
6 officer designated by Remote Legal, 11 Broadway, Suite  
7 468, New York, New York, to take the record of this  
8 proceeding.

9 This is the deposition of Jim Stewartson,  
10 taken in the matter of Flynn versus Stewartson, et al.,  
11 Case Number 2023 CA 004264 NC, filed in the Circuit  
12 Court of the Twelfth Judicial Circuit in and for  
13 Sarasota County, Florida Civil Division.

14 Would all counsel please identify  
15 themselves for the record and state who they represent  
16 starting with the noticing attorney.

17 MR. ROBERTS: Good afternoon. This is  
18 Jared Roberts on behalf of the plaintiff, Michael Flynn.  
19 With me is Stephen French.

20 THE PROCEEDINGS OFFICER: Okay.

21 MR. THURLOW: Good afternoon. George  
22 Thurlow on behalf of Defendant Jim Stewartson. My co-  
23 counsel, Craig Whisenhunt, is also on.

24 THE PROCEEDINGS OFFICER: Okay. And --  
25 okay. And Mr. Thurlow, your last name, I have it

1 Rayhart (phonetic), but you're Thurlow, so let me make  
2 sure I change that, just after I'm done with the --

3 MR. THURLOW: Yeah. There are two of us  
4 in the --

5 THE PROCEEDINGS OFFICER: Okay. Okay.

6 MR. THURLOW: Yeah. There are two  
7 Georges in my firm, and there's George Rahdert in Maine.  
8 Both of us are counsel of record, but I'm the one here  
9 today.

10 THE PROCEEDINGS OFFICER: Okay. Great.  
11 So I'm just going to make that little change -- one  
12 moment -- so we don't go too far without it. Okay.

13 This is -- this deposition is being taken  
14 remotely on behalf of the plaintiff, and is being  
15 conducted pursuant to the procedural rules and laws  
16 governing this matter.

17 As such, all parties agree to this means  
18 of capturing the official record, which may include  
19 recording by audio, audiovisual, and/or stenographic  
20 means, and agree not to oppose admissibility of the  
21 testimony in this proceeding on the basis of the  
22 personnel or method by which the testimony was captured.

23 Further, all parties agree that the  
24 proceedings officer or person administering the oath may  
25 be authorized to administer the oath under the rules

1 where they reside.

2 Do all parties so stipulate?

3 MR. ROBERTS: Yes, from Plaintiff.

4 MR. THURLOW: Yes, from Defendant.

5 THE PROCEEDINGS OFFICER: Thank you.

6 I will now swear in the witness.

7 But first, Mr. Stewartson, will you  
8 please state and spell your full name for the record.

9 MR. STEWARTSON: My full name is James  
10 Arthur Stewartson, J-A-M-E-S A-R-T-H-U-R S-T-E-W-A-R-T-  
11 S-O-N.

12 THE PROCEEDINGS OFFICER: Thank you.

13 Will you please raise your right hand.

14 Do you swear or affirm the testimony  
15 you're about to give shall be the truth, the whole  
16 truth, and nothing but the truth?

17 MR. STEWARTSON: Yes.

18 WHEREUPON,

19 J A M E S A R T H U R S T E W A R T S O N ,  
20 having been called as a witness, being duly sworn by the  
21 notary public present, testified as follows:

22 THE PROCEEDINGS OFFICER: Thank you.

23 Counsel, you may now begin.

24 EXAMINATION

25 BY MR. ROBERTS:

1           Q     Good afternoon, Mr. Stewartson, or perhaps,  
2     good morning where you are. My name is Jared Roberts.  
3     I'm here today on behalf of the plaintiff, Michael  
4     Flynn. I just want to go over some of the basics of  
5     depositions to begin, starting with, Have you ever been  
6     deposed before?

7           A     No, I have not.

8           Q     All right. So just a few ground rules to go  
9     over first. I'll keep it simple. But first, are you  
10    aware that you are under oath today?

11          A     Yes.

12          Q     And that it's the same oath that would apply  
13    as if you were testifying in court?

14          A     Yes.

15          Q     Are you under the influence of any drugs or  
16    alcohol that would affect your ability to testify  
17    truthfully?

18          A     No.

19          Q     Are there -- are there any other reasons that  
20    would prevent you from recalling events or testifying  
21    truthfully today?

22          A     No.

23          Q     During this deposition, I'll ask you a series  
24    of questions. And I don't want you to guess at any  
25    questions. If you need me to rephrase a question,

1 please just let me know. However, if you answer the  
2 question, I'll assume you understood it; is that fair?

3 A Sure.

4 Q And during today's deposition, if you need to  
5 take any breaks, that's fine. You can just let me know.  
6 I would just ask that if a question is pending, you  
7 answer the question before we take a break; is that  
8 fair?

9 A Sure. Yes.

10 Q Okay. Yeah. And then for purposes of the  
11 record, if you are going to give a yes or no answer, I  
12 would just ask that you verbally say yes or no instead  
13 of uh-huh or shaking your head, just so we have a clear  
14 record. Does that make sense?

15 A Yes.

16 Q Now, in preparing for today's deposition, did  
17 you review any documents?

18 A No -- I mean, sure. Which kind of -- what  
19 kind of documents? Can you rephrase.

20 Q Yeah. Anything that -- any documents that  
21 would help refresh your recollection of -- for the  
22 topics of today's deposition, specifically the four  
23 statements that are at issue.

24 A I reviewed some of my own tweets, if that's  
25 what you mean.

1 Q Yes.

2 A Yeah. Yes.

3 Q Did you review anything else?

4 A Just some of my own writing that I've done  
5 about Flynn to -- to refresh my recollection of my work  
6 over the last five years, but nothing beyond, sort of,  
7 reviewing my own content.

8 Q And what tweets did you review, if you can  
9 recall any?

10 A I -- I've -- I've looked at a lot. I -- I've,  
11 in the last five years, tweeted 120,000 times, so  
12 they're a lot.

13 Q Would you say you just generally went through  
14 your Twitter account?

15 A I -- I did some searches, you know,  
16 surrounding some of the topics that I understand we're  
17 going to talk about to refresh my recollection about the  
18 context and the meaning of the words that I used.

19 Q Can you give us the search terms that you  
20 used.

21 A Flynn, Nazi, Flynn, Pence, the -- the language  
22 that I believe are at -- at issue here.

23 Q And when you were reviewing these posts, did  
24 you save them anywhere?

25 A No. They're already saved. They're public.

1 Q Did you otherwise document which posts you  
2 were reviewing?

3 A No. I mean, I -- I take screenshots of -- of  
4 things sometimes to have, you know, a screenshot record  
5 of things. I don't recall doing that while I was  
6 looking at my tweets yesterday.

7 Q Okay. And do you have anything in front of  
8 you today?

9 A I have my computer.

10 Q Any documents?

11 A I have a -- I have an iPad over here, but I --  
12 I'm not -- there's nothing on it.

13 Q Okay. You don't have any documents printed  
14 out in front of you or anything?

15 A No.

16 Q Do you have anything pulled up on the iPad?

17 A No.

18 Q Did you meet with your attorneys in preparing  
19 for today's deposition?

20 MR. THURLOW: Objection insofar as it  
21 calls for privileged attorney-client communications.

22 BY MR. ROBERTS:

23 Q Yeah. Mr. Stewartson, I'm not -- I don't want  
24 to know about what you discussed with your attorneys,  
25 just simply asking if you did meet with them.

1 MR. THURLOW: You can go ahead and answer  
2 yes or no.

3 THE WITNESS: Yes.

4 BY MR. ROBERTS:

5 Q Okay. Do you recall roughly when you met with  
6 them?

7 A I've been talking with them and emailing with  
8 them, as one does with lawyers. I -- I -- I'm not sure  
9 what question you're -- you're asking me. I talked to -  
10 - I have talked to my lawyers and -- over the last  
11 several days, using a number of normal means of  
12 communication.

13 Q Okay. And were those meetings all in  
14 preparing for today's deposition?

15 MR. THURLOW: Objection insofar as it  
16 calls for privileged attorney-client communications.

17 BY MR. ROBERTS:

18 Q Did you meet with your counsel today?

19 A No.

20 Q Did you meet with your counsel yesterday?

21 A I emailed with my counsel yesterday.

22 Q When's the last time you had a phone call with  
23 your counsel?

24 A The day before that.

25 Q And roughly how long would you say that was?

1           A     Forty minutes. I'm not sure. I can't  
2 remember exactly.

3           Q     Did you meet with anyone other than your  
4 attorneys in preparing for today's deposition?

5           A     No.

6           Q     And are there any persons in the room with you  
7 right now?

8           A     No.

9           Q     All right. So starting with some of your  
10 background, please give me your educational background.

11          A     A high school graduate. Had a little bit of -  
12 - of college, you know, many, many years ago. But my --  
13 I am -- I am an autodidact. I -- I've -- I -- school  
14 was always a little slow for me, to be honest with you,  
15 so I -- I learned on my own.

16          Q     Fair enough. Where did you attend high  
17 school?

18          A     Montgomery Blair High School in -- in Silver  
19 Spring, Maryland.

20          Q     And did you obtain a high school diploma?

21          A     Yes.

22          Q     What year was that?

23          A     1986.

24          Q     And where did you attend college?

25          A     University of Maryland. Went to University of

1 San Francisco for a semester.

2 Q What years were you at the University of  
3 Maryland?

4 A '87, I think. I think it was the year right -  
5 - the year right after high school.

6 Q And what years were you at University of San  
7 Francisco?

8 A I -- I don't remember the exact year.  
9 Somewhere around '92, probably.

10 Q Do you remember what you studied at the  
11 University of Maryland?

12 A Yeah. I was -- it was a first semester. I  
13 was interested in computer science, but I hadn't  
14 declared any major or any of -- anything at that point.

15 Q Got it. Did you declare a major at the  
16 University of San Francisco?

17 A I may have declared computer science because  
18 that's what I was interested in, but I -- I can't  
19 recall. This is a long time.

20 Q Okay. And what is your work history?

21 A How -- can you -- can -- can you be more  
22 specific. Or give me a way to answer your question that  
23 is helpful because I've -- I've had a long work history  
24 over the last 30 years of -- of entrepreneurship,  
25 technology, entertainment.

1 Q Right. Of course. Yeah. And I find it  
2 easiest to work backwards most of the time. So I guess  
3 we can start with, are you currently employed?

4 A No. I'm self-employed.

5 Q Okay. And what does your self-employment  
6 consist of?

7 A Mostly revenue from Substack.

8 Q And how long have you been self-employed?

9 A Well, I've been self-employed many times over  
10 my working career, so. But the last sort of job that I  
11 had was in, I guess, 2021, working for Games AI Company.  
12 Let me make sure I have that date right. Yeah. '21.

13 Q Okay. And what year did you join the Games AI  
14 Company?

15 A '21.

16 Q Okay. And how long were you there for?

17 A About 8 or 9 months, something like that.

18 Q Okay. And where did you work before that?

19 A Before that, I was doing independent  
20 contracting work, creating virtual characters for  
21 translations. So it was -- it was to help people  
22 acclimate to situations using artificial intelligence  
23 and virtual reality.

24 Q How long did you work as an independent  
25 contractor doing that?

1 A About a year and a half, I guess.

2 Q So 2020 into 2021?

3 A Yeah. It's -- or 2019 to 2020.

4 Q Got it. And what did you do before that?

5 A Let me make sure. Forgive me. I -- before  
6 that, I was -- I worked at a company called Talespin,  
7 which did business-based virtual reality technology.

8 Q Okay. And how long were you there for? And  
9 Mr. Stewartson, you don't need to look anything up. If  
10 you don't remember, you can just tell me.

11 A Yeah. I -- I'm sorry. I -- I just want to be  
12 accurate.

13 Q No. Of course. I appreciate that.

14 A Yeah. It was 2018 to 2019. I worked there  
15 for about 18 months.

16 Q Okay. And before that?

17 A Before that, I believe, if you don't want me  
18 to look it up, I worked at -- I had my own company  
19 called "Awesome Rocketship," which built virtual reality  
20 simulators for entertainment.

21 Q Okay. Do you know roughly how long you did  
22 that for?

23 A 3 years.

24 Q 3 years. Okay. And do you recall what you  
25 did before that?

1           A     I think the job that I had before that was at  
2     Google, working for Niantic, which does -- does now  
3     Pokemon Go. So I was there while Pokemon Go was being  
4     built and other things. I -- I had my own alternate  
5     reality game project that I built for Google.

6           Q     Do you know roughly the years you were at  
7     Google for?

8           A     2014 to 2015.

9           Q     Okay. And was your employment before 2014?

10          A     I had a company called "Fourth Wall Studios."  
11     It was a sort of hybrid technology entertainment company  
12     that built experiences that told stories over your  
13     devices, your email, your text messages, et cetera. And  
14     I -- I was CEO of that company for 5 years.

15          Q     Okay. So that takes you into 2009, give or  
16     take?

17          A     Mm-hmm.

18          Q     Okay. And prior to --

19          A     But -- yeah. Sorry.

20          Q     Prior to 2009?

21          A     I was working at -- well, I think it's 2008,  
22     actually as a cut-off, but before that, I was working at  
23     42 Entertainment, which was a pioneering sort of  
24     marketing entertainment hybrid company that worked with  
25     Microsoft and, you know, the Dark Knight and other very

1 large properties to create marketing experiences.

2 Q Got it. And how long were you -- did you do  
3 that for?

4 A 4 years, I think.

5 Q Okay. So starting around 2004?

6 A 2003, I believe, is when that company started.

7 Q Got it. And prior to that -- what was your  
8 employment?

9 A I was CTO of an artificial intelligence,  
10 virtual reality company that built technology to capture  
11 and display 3D animation based on facial recognition.

12 Q And do you remember which years you did that  
13 for?

14 A The previous company was bought in 2000, so I  
15 think that was 2000 to 2003. Pretty sure.

16 Q Okay. And what about before then?

17 A I ran -- I was co-founder and CTO of a company  
18 called "Shout Interactive," which built 3D engines and  
19 content for web browsers online. So we built lots of  
20 high-end 3D gaming experiences through the '90s for  
21 large brands.

22 Q Okay. Roughly which years was that?

23 A '96 to 2000. Something like that.

24 Q Okay. And before '96?

25 A Before '96 --

1 Q I know we're getting back there now.

2 A What's that?

3 Q I know we're getting way back in the years  
4 now.

5 A Well, I would -- well, it's okay. I -- I had  
6 a -- a -- an independent graphic design company called  
7 "Eponymous Press," which I believe was '92 to '95, where  
8 I was building -- you know, in the very early days of  
9 the web, I was building, you know, 3D experiences and  
10 other things.

11 Q And I know you -- we discussed that you went  
12 to San Francisco around 1992. Were you employed while  
13 you were a student there?

14 A Yes. I mean, yeah. I was -- I -- I -- was  
15 employed.

16 Q Okay. And between 1986, when you went to  
17 Maryland, and 1992, with San Francisco, what did you do  
18 during those years?

19 A I worked in Maryland as a -- as a bartender.  
20 I was a musician from my very early youth, so I had a  
21 lot of music activities going on. And then I think it  
22 was '90, I moved to -- so I was bartending and things  
23 like that. And in '90, I moved to San Francisco because  
24 my friends were there, and we wanted to start a band.

25 Q So is it accurate to say you really haven't

1 had many gaps in your employment?

2 A No. I mean, I -- it depends on what you mean  
3 by "gaps." I mean, there were -- there were lots of  
4 years where I wasn't technically employed by anybody.

5 Q Got it.

6 A I've -- I've always been an independent, sort  
7 of, person, sometimes as a business and sometimes on my  
8 own.

9 Q Understood. And prior to this case, have you  
10 ever been a party to a lawsuit?

11 A Only a bank. I think -- I think the only  
12 other lawsuit that there is is a bank credit card  
13 foreclosure at some point.

14 Q Got it. Do you have any criminal convictions?

15 A No.

16 Q Please list for me all social media platforms  
17 that you use, where you have a current account,  
18 including your username on each platform.

19 A Sure. Substack, where the -- I -- I think  
20 it's jimstewartson, just all one word. Twitter or X,  
21 whatever we're calling it now, I have a significant  
22 account. I have a small account on Mastodon and a small  
23 account on Threads, where mostly I just post articles  
24 that I've written on Substack.

25 Q Do you know your username on those -- on those

1 platforms?

2 A I believe on -- oh, also on Bluesky, I have a  
3 account. Sorry. On Bluesky, it's jim-stewartson, and  
4 on the other ones, I believe it's just jimstewartson for  
5 all of them.

6 Q Got it. And can you describe to me what  
7 Substack is.

8 A That's a blogging platform, effectively, where  
9 you can charge for -- charge a subscription.

10 Q Okay. And do you get paid for posting on  
11 Substack or for having subscribers?

12 A I don't charge for any of my articles. I have  
13 a -- I allow people to subscribe for \$7 a month to  
14 support me, but my articles have never been behind a  
15 paywall.

16 Q Do you know roughly how many subscribers you  
17 have?

18 A Yes. About 33,500 on Substack.

19 Q And do they all regularly pay the \$7 a month?

20 A No, no. The -- no. Small fraction.

21 Q Okay. Do you post about General Flynn on  
22 Substack?

23 A Rarely, but yes. He -- he's not a main focus  
24 of my work on Substack, but -- but I certainly write  
25 about him when I feel -- when I have concerns.

1 Q Do you -- what percentage of your Substack  
2 posts would you say involve General Flynn?

3 A Five percent, maybe.

4 Q Okay. And Mr. Stewartson, do you host any  
5 podcasts?

6 A Yes. I -- I am a co-host of a podcast called  
7 "Radicalized Pod: Truth Survives."

8 Q Do you receive any income from that podcast?

9 A No.

10 Q Who are your co-hosts?

11 A Heidi Cuda and Josh Fidel.

12 Q And how long have you operated this podcast  
13 for?

14 A I think we started in 2021 November, I  
15 believe.

16 Q And how frequently do you put out episodes?

17 A We have an interview once a week. I mean,  
18 it's varied because we've changed things over the years,  
19 but usually it's basically an interview with somebody  
20 that we find notable, and -- and then we have a  
21 livestream every week, where we just kind of talk about  
22 it more casually amongst ourselves.

23 Q Do you discuss General Flynn on this podcast?

24 A Occasionally, at about the same percentage as  
25 I do on any other platform.

1 Q Got it. Have you appeared on any other  
2 podcasts in the last two years that aren't your own?

3 A A couple. Yes. There was one Tony -- no.  
4 Not -- can't remember the name of it. It was a  
5 MeidasTouch podcast that I went on. I went on a podcast  
6 with Dean Blundell, we did a brief appearance with Lev  
7 Parnas on Substack, but those were just one-off  
8 appearances.

9 Q Okay. Do you recall whether or not you  
10 discussed General Flynn on these podcasts?

11 A I believe I did on the MeidasTouch podcast,  
12 but -- I -- I can't recall. Certainly, I -- I'm sure I  
13 did with Dean, and, you know, Flynn is -- is a topic.

14 Q Right. Do you remember which topics about  
15 General Flynn that you discussed?

16 A No. I'm sorry. I -- I --

17 Q No, it's okay. Have you ever communicated  
18 about General Flynn with anyone else via text message,  
19 outside of your attorneys?

20 A Only in the sense that Flynn is a -- is a  
21 newsworthy person. I have friends that send me things  
22 like articles about him, et cetera. But I don't discuss  
23 what I do with anyone. I don't -- I don't discuss my  
24 content and my words with anyone before I say them.

25 Q And who is your cell phone carrier?

1 A AT&T, I think. Yes.

2 Q And your cell phone number?

3 A (Answer marked as confidential.)

4 Q Do you have any prior cell phone numbers?

5 A No. I've had that one for nearly 30 years  
6 now.

7 Q Got it. Have you communicated about General  
8 Flynn with anyone via email other than your attorneys?

9 A Probably, but nothing -- but I -- I -- in --  
10 in the general course of things, people are aware that  
11 there is a lawsuit. People are aware of things like  
12 that. And I -- I -- you know, I mean, Flynn is a famous  
13 man doing a lot of things. And so -- and so I'm sure  
14 that -- that there has been -- his name has come up, but  
15 I don't have conversations about anything that I do or  
16 say with anyone else. That's my process.

17 Q Got it. And what current email addresses do  
18 you have?

19 A The -- the only one I really use is  
20 jim@rides.tv (phonetic).

21 Q Okay. Did you have any prior emails that you  
22 regularly used?

23 A Sure. Dozen -- lots of them. I can't recall  
24 them all or --

25 Q Can you -- sorry -- can you give me any of the

1 ones that you recall.

2 A Jim@stewartson.com was one that I used for a  
3 long time before it got, sort of, attacked with spam.

4 Q Okay. All right. So now I kind of want -- I  
5 want to switch gears to the statements at issue in this  
6 case. And let's see if we can get these exhibits to  
7 work here. So I'm going to share the first exhibit.

8 MR. ROBERTS: And we can mark this as  
9 Plaintiff's Exhibit 1.

10 (Plaintiff's Exhibit 1 marked for identification.)

11 BY MR. ROBERTS:

12 Q And Mr. Stewartson, do you see this exhibit on  
13 your screen? You should be able to move it around and  
14 review it. You should be able to scroll on your own.

15 A Yeah.

16 Q And let me know if you have any issues seeing  
17 it or scrolling.

18 A I see it. Yeah.

19 Q Okay. So @jimstewartson, is -- this is your  
20 account, correct?

21 A Yes.

22 Q Okay. And do you recognize this post?

23 A I -- I don't remember it specifically, but I -  
24 - I believe that it's a post of mine.

25 Q Okay. Do you have any reason to think that

1 you didn't post this?

2 A No.

3 Q And in this you wrote, "Mike Flynn is a nazi,"  
4 correct?

5 A Yes.

6 Q Okay. What did you base this assertion on?

7 A Well, there's -- I -- I am quote tweeting his  
8 channel, his Telegram channel, which was full of literal  
9 Nazis, people saying that they want death to Jews and  
10 all of the things that Nazis do. And in my opinion, and  
11 this is just this tweet allowing that and encouraging  
12 this behavior, which is demonstrated on his channel, to  
13 me, that is, if -- if you are encouraging Nazis, then  
14 that makes you a Nazi, in my opinion.

15 Q Is there anything that General Flynn himself  
16 said that made you call him a Nazi?

17 A There are thousands of things that he said  
18 that have made me come to that conclusion.

19 Q Okay. And what are those?

20 A A -- a Nazi is short for national socialist.  
21 National socialism has an ideology. That ideology is  
22 eliminationist. It is anti-Semitic. It is racist. It  
23 is anti-immigrant. And it is authoritarian  
24 dictatorship.

25 Those are -- that is the concept of national

1 socialism. And I have watched Mike Flynn for now five  
2 years promote every one of those ideas, promote the  
3 conspiracy theory, that there is a -- that there is a  
4 cabal of communists and -- and George Soros and -- and  
5 people who are trying to take over the federal  
6 government, and what needs to happen is a war against  
7 that. To me, that is -- that is the definition of Nazi.

8 Q All right. I'm going to close this exhibit  
9 out. And next -- I'm going to pull up the next post  
10 here. Sorry. Technology is not my strong suit.

11 MR. ROBERTS: All right. This next  
12 exhibit we can mark as Plaintiff's Exhibit 2.

13 (Plaintiff's Exhibit 2 marked for identification.)

14 BY MR. ROBERTS:

15 Q Mr. Stewartson, do you recognize this post?

16 A Yes. Or vague -- yes. Yes.

17 Q Did you make this post?

18 A I'm sure I did.

19 Q Do you have any reason to think that you  
20 wouldn't have made this post?

21 A No. I'm sure I did make this post.

22 Q Okay. And in this you wrote, "He wants to be  
23 Hitler. He wants a second holocaust. Truly." Correct?

24 A Yes.

25 Q Were you referring to General Flynn when you

1 said this?

2 A Yes.

3 Q And what did you base this assertion on?

4 A Well, in -- in this particular case, again,  
5 the context is his own output on his Telegram channel,  
6 where he is using Nazi concepts. Nazi -- the -- the  
7 entire channel was full of -- of Nazis. And the end  
8 result of this kind of rhetoric, which he is promoting,  
9 is Holocaust.

10 So -- so, yes. It is based on the -- again,  
11 this is -- when was this? 2021? So I had been, you  
12 know, following Mike Flynn closely for well over a year,  
13 and this was and still is my opinion.

14 Q How would you define "Holocaust"?

15 A A genocide of -- of humans based on fascist  
16 ideology.

17 Q And what would you -- how would you define  
18 "genocide"?

19 A A -- a systematic murder of a specific kind of  
20 person.

21 Q Okay. Close this out.

22 MR. ROBERTS: All right. I'm pulling up  
23 the next post in this -- at issue in this case. We can  
24 mark this as Plaintiff's Exhibit 3, please.

25 (Plaintiff's Exhibit 3 marked for identification.)

1 BY MR. ROBERTS:

2 Q Mr. Stewartson, this appears to be another  
3 post on your X account from March 28, 2023. Do you  
4 recognize this post?

5 A Yes.

6 Q Okay. Did you make this post?

7 A I'm sure I did. Yes.

8 Q Okay. And in it you wrote, "Mike Flynn  
9 employed Jack Posobiec to torture prisoners in  
10 Guantanamo"; is that correct?

11 A Yes.

12 Q And what did you base this assertion on?

13 A Jack Posobiec's words. Jack Posobiec brags  
14 about having, you know, worked under Flynn while he was  
15 at DIA, and he brags about interrogating detainees at  
16 Guantanamo while he was working for Mike Flynn. You can  
17 argue about whether torture happened in Guantanamo or if  
18 you -- if you want, but -- but the ACLU and numerous  
19 humanitarian organizations believe there was a lot of  
20 torture that went on in that facility.

21 So I found it -- I found it to be of interest  
22 to my followers that Jack Posobiec, who has himself  
23 openly said neo-Nazi and fascist things, was working at  
24 Guantanamo, interrogating prisoners while he was working  
25 for Mike Flynn, especially because of the relationship

1 that developed after that, where Posobiec was one of the  
2 primary pushers of Pizzagate and other horrific  
3 conspiracy theories.

4 Q Do you -- are you aware of any specific  
5 statements from Mr. Posobiec that he did torture  
6 prisoners?

7 A I -- I wrote an article that said that he  
8 interrogated prisoners in Guantanamo. And he read my  
9 article and said, No, they're not prisoners. They're  
10 detainees. So -- so he -- he is the one who -- who is -  
11 - who was bragging about it and, you know, correcting my  
12 language about the people that he interrogated at a  
13 black site torture facility.

14 Q Are you aware of any statements that General  
15 Flynn hired Mr. Posobiec to interrogate prisoners or  
16 detainees?

17 A I am aware that Mike Flynn was the head of the  
18 organization that Jack Posobiec was working for.

19 Q Are you aware of any official government  
20 reports discussing torture of prisoners at Guantanamo  
21 Bay?

22 A I'm -- I'm not sure what -- exactly what the  
23 status of -- of investigations of Guantanamo is, but the  
24 government's version of what went on there is not to --  
25 to be terribly relevant in this case.

1 Q All right. I'm going to close this one out.  
2 All right. And the fourth statement at issue in this  
3 case -- and I'll share this.

4 MR. ROBERTS: We can mark this as  
5 Plaintiff's Exhibit 4, please.

6 (Plaintiff's Exhibit 4 marked for identification.)

7 BY MR. ROBERTS:

8 Q Mr. Stewartson, this appears to be another  
9 post from your account on April 5, 2023. Do you  
10 recognize this post?

11 A I -- let me -- probably. I -- I -- I'm sure -  
12 - I'm sure it's mine. I'm not suggesting it's not.

13 Q Okay.

14 A I don't -- I don't recognize this one in  
15 particular, but --

16 Q Do you have any reason to doubt whether you  
17 made this post?

18 A No, no. Nope.

19 Q And in this post, you wrote, "Mike Flynn  
20 literally tried to murder Mike Pence," correct?

21 A With QAnon.

22 Q With QAnon. Okay. Yeah. And what did you  
23 base this assertion on?

24 A Observation. The -- my --

25 Q What were those observations?

1           A     What's that?

2           Q     I'm sorry. I didn't mean to cut you off, Mr.  
3 Stewartson. I was just asking what those observations  
4 were.

5           A     Those observations were Mike Flynn and his  
6 entire coterie around him promoting conspiracy theories  
7 about Mike Pence, leading up to January 6th. His  
8 associate, Ivan Raiklin, who calls himself a loyal  
9 digital soldier for Mike Flynn, created the Pence card,  
10 which was the strategy to pressure Mike Pence into not  
11 validating the election.

12                     And Mike Flynn's associates from Proud Boys,  
13 Oath Keepers, and QAnon were all advocating for hunting  
14 him down and ultimately hanging him. And according to  
15 reports, they came within 100 feet.

16          Q     What were the reports?

17          A     So in my -- in my opinion, and based on the  
18 many, many, the hundreds or thousands of hours that I  
19 watched of Mike Flynn and his rhetoric leading up to  
20 January 6th, it was very, very clear to me that they  
21 wanted to get rid of him.

22          Q     You mentioned reports. Do you recall what  
23 those reports were?

24          A     The -- they're -- I'm -- I'm sorry. Which  
25 reports? I want to make sure I got the question right.

1 Q I believe you mentioned reports in the context  
2 of coming close to killing Mike Pence.

3 A Yes. I -- I can't remember the specific news  
4 reports, but there were reports that the -- that the --  
5 they came very close to getting Mike Pence. I -- I  
6 don't remember the exact -- I don't -- I don't think  
7 that that's a controversial -- it was -- it was a close  
8 call.

9 Q And are you aware of any statements from  
10 General Flynn of him saying he wanted Mike Pence dead?

11 A Not -- no. He's -- not directly, but --  
12 everything but, in my opinion. I mean, he -- he spent  
13 years and years and years attacking Mike Pence with vile  
14 conspiracy theories. His -- his partner, Ivan Raiklin,  
15 has been over and over and over again on many podcasts,  
16 right-wing podcasts, you know, talking about the -- the,  
17 you know, scourge of Mike Pence and how he is a traitor  
18 and how he is trying to -- he tried to overthrow the  
19 government.

20 Mike Pence took the VP spot in 2016 that Mike  
21 Flynn wanted. Mike Pence is the one who said that Mike  
22 Flynn lied to him about talking to the Russian  
23 government. He resents Mike -- Mike Pence, and he has  
24 been very, very clear about that for a long time.

25 Q Are you ever aware of any statements from Ivan

1 Raiklin saying he wanted Mike Pence dead?

2 A I'd have to go look, but it would not surprise  
3 me if he came extremely close. Ivan Raiklin's entire  
4 project is to come as close as he can to murderous  
5 rhetoric.

6 Q All right. I'm going to close this one out.  
7 Mr. Stewartson, do you remember answering  
8 interrogatory questions in this case?

9 A Yes, I think. I'd be -- yes.

10 Q Okay. I'm going to pull these up, and we can  
11 mark them as Plaintiff's Exhibit 5.

12 (Plaintiff's Exhibit 5 marked for identification.)

13 BY MR. ROBERTS:

14 Q And Mr. Stewartson, if you can just  
15 familiarize yourself with this document, and let me know  
16 if you recall answering these interrogatory questions.

17 A Let's see. Yeah.

18 Q Okay. And on page 11, if you can let me know  
19 when you're there.

20 A Uh-huh.

21 Q Is that your signature there, Mr. Stewartson?

22 A Yeah.

23 Q All right. Besides your attorneys, did anyone  
24 assist you in preparing your responses to these  
25 interrogatories?

1           A     No.

2           Q     All right. Starting -- sorry. Back up at the  
3 top, on page 3, starting with the first interrogatory,  
4 if you can let me know when you're there?

5           A     Mm-hmm.

6           Q     Okay. So you wrote that you have based your  
7 conclusions on open-source information and articles  
8 read. Can you give us some background into how you do  
9 your research.

10          A     I use the -- I use the tools of the -- of --  
11 of the internet. I do -- I use artificial intelligence  
12 to do deep searches. I -- I have -- I use technology to  
13 find information that is publicly available on the  
14 internet.

15          Q     Is there a certain publication or publications  
16 that you primarily read, like CNN, New York Times, any  
17 of those?

18          A     Absolutely not. My -- my whole process is to  
19 not rely on any source of information but to draw my own  
20 conclusion from the information available.

21                   THE PROCEEDINGS OFFICER: Please  
22 interject. There have been a couple of times where I  
23 heard "Mm-hmm" as a response, and I just want to remind  
24 you to please say yes or no because I can't interpret  
25 "Mm-hmm" for the record.

1 THE WITNESS: Yes, ma'am. Sorry about  
2 that.

3 THE PROCEEDINGS OFFICER: Thank you.

4 BY MR. ROBERTS:

5 Q Do you have any process for vetting your  
6 sources?

7 A I have a personal process of -- of identifying  
8 sources that I see as trustworthy versus not  
9 trustworthy. But my process is to find the actual  
10 evidence of things through whatever -- sometimes I find  
11 things through right-wing media that I don't believe --  
12 you know, that I -- I don't believe in, but they have  
13 information that is -- that is valuable. I will get  
14 information from wherever, and then I will confirm its  
15 validity myself.

16 Q What steps do you take to confirm the  
17 validity?

18 A I will look for other places where the -- the  
19 -- you know, these things are -- are being discussed to  
20 make sure that -- that this isn't a biased point of  
21 view. There's a huge amount of bias -- I think it's the  
22 one thing that Flynn and I would agree with -- in the  
23 media.

24 And so I -- I have a process for discerning  
25 what's real and what isn't by validating the information

1 myself, by comparing it to everything else I know, and  
2 if it's -- if it doesn't fit, then I find it  
3 interesting.

4 Q What do you mean by "if it doesn't fit"?

5 A If it doesn't make sense to me, if there's a  
6 piece of information that somebody is reporting on that  
7 doesn't align with what I understand to -- to be the --  
8 the, you know, current state, whether it's geopolitics  
9 or domestic politics or whatever it is, it is those  
10 outliers that I find interesting because I -- I want to,  
11 you know, disprove or prove something that I find to be  
12 of interest.

13 Q Okay. And also, in response to Interrogatory  
14 1, you wrote that you do not have direct knowledge at  
15 any time of persons with knowledge of the facts and  
16 circumstances. Is it -- am I correct in stating then  
17 that you did not reach out to any persons who had  
18 knowledge of these events?

19 A I -- I've talked to, you know, a lot of times  
20 just on Twitter in public with a lot of people, you  
21 know, in -- a lot. Hundreds or thousands of people, you  
22 know. It -- it -- but I don't have -- you know, it's --  
23 there is no secret source, if that's what you're looking  
24 for.

25 Q Okay. For example, did you speak with anyone

1 who happened to be at Guantanamo Bay the same time Jack  
2 Posobiec was?

3 A I -- I did not find a colleague of -- of Jack  
4 Posobiec at Guantanamo.

5 Q Okay.

6 A No, I did not.

7 Q All right. Now moving on to Response Number  
8 2. You indicate that you have a GoFundMe and that  
9 friends organized this for you. Which friends organized  
10 this?

11 A Heidi Cuda --

12 MR. THURLOW: Insofar as it calls for  
13 attorney-client communication, as cited in the  
14 interrogatory, it's generally considered confidential  
15 and protected under attorney-client privilege. Who may  
16 be providing financial support for a party's legal fees,  
17 the legal side on that's Tumelaire versus Naples Estates  
18 Homeowners Association, 137 Southern 3rd 596, page 599.  
19 It's the second DCA case from 2014.

20 You can answer this question, but you're  
21 not to disclose anything about who is donating to you,  
22 based on attorney-client privilege.

23 THE WITNESS: Okay.

24 BY MR. ROBERTS:

25 Q So, yeah. Mr. Stewartson, just -- my question

1 is, who set up the GoFundMe for you?

2 A My -- my co-hosts, Heidi Cuda and my friend,  
3 who's a former Biden security member, Jackie -- Jackie  
4 Singh.

5 Q And do you know roughly how much money has  
6 been donated to you to date?

7 A 90 -- somewhere around 90,000.

8 Q All right. Going down to -- do you know any  
9 of the people who donated?

10 A I'm sure I do, but I don't -- I -- I've --  
11 believe it or not, I've actually never looked at the --  
12 that donation page. I -- I -- you know, I've had people  
13 on Twitter say, I donated, and then I say, Thank you.  
14 That's very sweet.

15 Q All right. Have any big names that you would  
16 consider donated? So that's a broad question, but if  
17 you understand it --

18 A No, no. Every single -- to my knowledge,  
19 there -- you know, there -- no. There are no big names  
20 there.

21 Q Okay. And if you can go down to page 7,  
22 please, and let me know when you're there. And I'll be  
23 looking at Interrogatory Number 9.

24 A Mm-hmm.

25 Q Okay. And so starts with a question asking

1 you to identify and describe the steps you took to  
2 confirm or fact check. And then your response continues  
3 onto the eighth page, and it says that you spent more  
4 than 20,000 hours on research; is that correct?

5 A Mm-hmm.

6 Q Okay. What did you do for those 20,000 hours?

7 THE PROCEEDINGS OFFICER: Yes? I heard  
8 "Mm-hmm." He said, Could you please go down to page 7  
9 and look at that interrogatory. He asked you a question  
10 and you said "Mm-hmm."

11 THE WITNESS: Yes.

12 THE PROCEEDINGS OFFICER: Yes? Thank  
13 you.

14 THE WITNESS: Apologies. I -- I don't  
15 think of those as questions, but I realized for you they  
16 are. So apologies.

17 BY MR. ROBERTS:

18 Q This is the pain of deposition, so.

19 A Please -- please repeat the question so that I  
20 can answer.

21 Q Yes, yes. And you're not doing anything that  
22 nobody else does all the time, so don't worry about  
23 that.

24 So what did you do for those 20,000 hours of  
25 research?

1           A     Watched and recorded and wrote about what I  
2 saw as an extremely dangerous movement in America.

3           Q     And was this 20,000 hours just on General  
4 Flynn?

5           A     Absolutely not.

6           Q     Okay. What percentage of it would you say was  
7 on General Flynn?

8           A     Again, you know, overall, 5 percent, maybe a  
9 little more.

10          Q     Did you document your research anywhere other  
11 than your postings online?

12          A     I -- I have a Substack with close to 2,000  
13 articles.

14          Q     Did you take any -- for example, when you're  
15 researching, take any notes that you would use to later  
16 draft Substack articles?

17          A     I mean, I jot things down in notepad, like any  
18 normal person does, you know, getting ready to write  
19 something, but I -- I -- you know, I don't -- there's no  
20 official notepad or anything.

21          Q     Do you still have --

22          A     Sorry?

23          Q     Do you still have any of those notes?

24          A     I'm sure there's a -- I'm sure I do, but  
25 they're -- they're nothing -- I mean, they're literally

1 -- like I put a link in that I wanted to remind myself  
2 about, right? It's not -- I don't have a -- you know,  
3 some repository of my -- my research. I document it in  
4 real time. That is my process. I -- I do not hold  
5 things back as I learn things. I share them with --  
6 with people in ways that I -- I think are effective and  
7 important.

8 Q And say -- if you came across a post that was  
9 relevant to your research, do you save these posts  
10 anywhere?

11 A Yeah. I mean, I -- I have over 100,000  
12 screenshots, I think.

13 Q And have you produced these in discovery?

14 A The -- my entire photo library? No.

15 Q The ones just pertaining to this case?

16 A I don't have -- I -- again, I don't -- there's  
17 there -- none of them are pertaining to this case. They  
18 -- I -- I didn't -- it -- I mean, unless you mean, like,  
19 these specific tweets, like, I -- there may be something  
20 where I -- I reminded myself to comment on the neo-Nazis  
21 and Flynn's telegram channel, but I -- I don't --  
22 there's nothing -- I'm -- I'm trying to be as -- as  
23 productive here as possible. I -- I just don't know  
24 what you're looking for, to be honest.

25 Q Well, I appreciate that. Did you save

1 anything that gave you a basis for the four statements  
2 that are at issue in this case?

3 A No. Nothing in particular. Again, I -- I  
4 write the things down that I conclude as I conclude them  
5 publicly.

6 Q Do you conduct any search through these files  
7 to determine whether anything in those files gave you a  
8 basis for the four statements in this case?

9 A No.

10 Q Okay. Now, the next page, page 9, turning  
11 your attention to Response 12, if you can let me know  
12 when you're there.

13 A Okay.

14 Q Okay. So in this response, you mentioned that  
15 you did not discuss these statements with anyone else;  
16 is that correct?

17 A Correct.

18 Q Okay. And so what steps did you take to look  
19 for any such communications, if any?

20 A I didn't -- I didn't because I -- I never,  
21 period, talked to anybody about something that I am  
22 going to post or write about, ever.

23 Q Okay. Have you deleted any private messages,  
24 emails, DMs involving General Flynn in the past years?

25 A No.

1 Q Okay.

2 A Well, I -- let me be -- I mean, not -- not in  
3 -- in connection with this case or anything. To be  
4 clear, there are conversations, I'm sure, and DMS or  
5 whatever that, you know, have been deleted in the course  
6 of time, but I have not deleted anything to any  
7 communications in regard to this case.

8 Q All right. And on that same page, Response  
9 13, we discussed a little bit about your social media  
10 accounts. I understand you also added that you have a  
11 Bluesky account now. Other than Bluesky, is this a  
12 complete list of your social media accounts?

13 A I think that's right. Yeah. I forgot  
14 Facebook before. Apologies.

15 Q All good. Do you operate or post under any  
16 pseudonyms or pseudonymous accounts?

17 A No.

18 Q Okay. Have you ever deleted any posts about  
19 General Flynn?

20 A I have deleted lots of posts, and I'm sure  
21 some of them were about General Flynn.

22 Q Do you recall any specific examples?

23 A I deleted a post the other day in connection  
24 with this -- this case that, you know, might have been a  
25 little bit -- that -- that I -- I just -- I -- I had

1 second thoughts about, and so I deleted it.

2 Q And what was the post?

3 A It was about Flynn having done a deposition.

4 Q So, yeah. I will close this out.

5 MR. ROBERTS: And we're reaching about an  
6 hour. I was going to suggest a break, and it's actually  
7 perfect timing because I just got the notification that  
8 my laptop needs to be charged. So if we can go off the  
9 record for maybe five minutes.

10 THE WITNESS: Okay with me.

11 MR. ROBERTS: Or 10 minutes. I'm sorry.  
12 If we can, say, maybe come back at 2:15. 9 -- I'm not  
13 sure what time that is for you, Mr. --

14 (Off the record.)

15 THE PROCEEDINGS OFFICER: Okay. We're,  
16 excuse me -- back on the record. The time is 2:17 p.m.,  
17 Eastern Time.

18 BY MR. ROBERTS:

19 Q All right. Mr. Stewartson, we went off the  
20 record, are you aware that you're still under oath?

21 A Yes, I am.

22 Q Okay. Do you recall responding to requests  
23 for production in this case?

24 A I believe -- yes. Yes. As part of the --  
25 yeah -- prep for this.

1 MR. ROBERTS: Okay. I'm going to pull  
2 this up. We can mark it as Plaintiff's Exhibit 6.

3 (Plaintiff's Exhibit 6 marked for identification.)

4 BY MR. ROBERTS:

5 Q Mr. Stewartson, do you -- take a minute to  
6 review this document and let me know if you're familiar  
7 with it.

8 A Uh-huh. Oh, sorry. Yes.

9 Q And on page 6, is that your signature?

10 A Yeah. Yes.

11 Q All right. So Request Number 2, along with --  
12 then it would have been 5, 6, 7, and 8, asked for  
13 documents relating to the specific statements at issue  
14 in this case, and you responded that you have no such  
15 documents. Is it your testimony that you have not  
16 communicated with anyone about these statements?

17 A That's correct.

18 Q And did you conduct any sort of search to look  
19 for documents that these requests would encompass?

20 A I mean, there's nothing really to search.  
21 Again, my -- my work and my research is public.

22 Q And have you ever deleted any messages or  
23 emails that would have pertained to these requests.

24 A No.

25 Q I'm going to close this out. Next, I want to

1 turn to the answer that your attorneys filed in this  
2 case.

3 MR. ROBERTS: And we can mark this as  
4 Plaintiff's Exhibit 7.

5 (Plaintiff's Exhibit 7 marked for identification.)

6 BY MR. ROBERTS:

7 Q Mr. Stewartson, if you can familiarize  
8 yourself with this document, and let me know if you  
9 recognize it.

10 A I do -- I -- I recognize it. Yes. Let me  
11 make sure that I understand exactly what this is. Yes.

12 Q Okay. And starting on page 13, your attorneys  
13 filed some affirmative defenses on your behalf, and so I  
14 just want to ask some general questions pertaining to  
15 these defenses, starting with, what was your purpose in  
16 posting the subject statements about General Flynn?

17 A To warn American citizens of what I see as a  
18 dangerous threat.

19 Q And do you consider the statements you've made  
20 that are at issue here to be factual?

21 A I believe that they're -- that they consist of  
22 my strong opinion, my personal opinion that those are  
23 facts.

24 Q Did you intend for your viewers to view the  
25 statements as facts?

1           A     I intended for them to see them as my opinion  
2 of the fact.

3           Q     You said your purpose in it was to inform  
4 them, so did you want the viewers -- your viewers to  
5 believe them?

6           A     I wanted them to look at my statements and the  
7 information and the context of the statements and decide  
8 for themselves whether they agree.

9           Q     And did you want your statements to reach a  
10 large audience?

11          A     Yes.  Sure.

12          Q     Did you think it was important for your  
13 statements to reach a large audience?

14          A     My purpose and my work is to warn people about  
15 the -- what I see as a dangerous threat.  And so,  
16 therefore, the more people that I can warn of that, the  
17 better it is for my goal.

18          Q     And before making the subject statements, did  
19 you review any contrary information or look for sources  
20 that were contrary to what you were saying?

21          A     Well, depending on the -- on which statement  
22 you're talking about, they're the -- I had looked for --  
23 it is my process to look for contrary information to  
24 anything.  And in -- in my opinion, the more I looked,  
25 the more my opinions became strengthened.  I -- I had no

1     desire to come to these conclusions.  They -- the  
2     conclusions came from a lot of research, as I indicated.

3           Q     What contrary information did you look at  
4     before posting "Mike Flynn is a Nazi"?

5           A     I mean, I -- most of my research on Mike Flynn  
6     is simply listening to Mike Flynn.  So the -- the  
7     contrary -- you know, I -- I don't know of, you know,  
8     anybody who's out there trying to prove that he isn't  
9     one, but I -- I -- it was not my desire to come to this  
10    conclusion.  That came after many, many, many hours of  
11    research.

12          Q     Do you think it's important for others to come  
13    to that same conclusion?

14          A     I think it's -- I think my -- my opinions and  
15    my viewpoint are valid and important, and I want as many  
16    people as possible to know what they are.  And they can  
17    come to conclusions themselves.

18          Q     Did you look at any contrary information  
19    before posting that Mike Flynn wants a second Holocaust?

20          A     Again, the -- the same answer.  Somebody has a  
21    microphone (indiscernible - audio disruption), and I'm  
22    getting crosstalk.

23                   MR. ROBERTS:  George, I think it was when  
24    you unmuted it, it started -- it's kind of -- I see the  
25    --

1 THE WITNESS: Yeah.

2 MR. ROBERTS: It got fixed it.

3 THE WITNESS: There it is. Sorry about  
4 that. Can we -- we go back to where we were?

5 BY MR. ROBERTS:

6 Q Yeah. I'm just asking, did you look up any  
7 contrary information before posting that Mike Flynn  
8 wants a second Holocaust?

9 A Again, I -- I'm not sure what you mean by  
10 "contrary information" other than me reviewing as much  
11 as possible, you know, including family, background, and  
12 everything I could about this man before, you know,  
13 coming to these conclusions.

14 Q And did you review any contrary information  
15 before posting that Mike Flynn literally tried to murder  
16 Mike Pence?

17 A With QAnon.

18 Q With QAnon.

19 A There -- there is no contrary information.

20 Q Did you search for any?

21 A I did not search for "Mike Flynn didn't murder  
22 Mike Pence." I did not do that. But, you know, again,  
23 from my point of view, my -- my goal is not to find out  
24 if Mike Flynn wants this to happen. I -- I don't want  
25 that. I don't want a retired general to do that. But,

1 unfortunately, the -- the evidence, as I continued to  
2 pile it up, led me to that conclusion.

3 Q And what was that evidence?

4 A Watching Mike Flynn, watching his associates,  
5 watching January 6th. I -- I watched it happen. In  
6 fact, I predicted it -- how it would happen step-by-step  
7 well before it happened by watching Mike Flynn.

8 Q Did you view anyone specifically attempt to  
9 murder Mike Pence on January 6th?

10 A I saw a massive crowd of MAGA, QAnon, Oath  
11 Keepers, Proud Boys chanting as loud as they could:  
12 Hang Mike Pence.

13 Q You know if Mike Pence was in that crowd?

14 A Mike Pence is in the Capitol trying to get  
15 away from that crowd.

16 Q And did you review any contrary information  
17 before posting that Mike Flynn hired Jack Posobiec to  
18 torture prisoners at Guantanamo?

19 A Sure. I -- I did, actually. I was -- I -- I  
20 was surprised by this information. And, again, if you  
21 look at the exhibit, Jack Posobiec is the one who says  
22 it.

23 Q And what contrary information was that that  
24 you reviewed?

25 A I -- I've looked for anything that said --

1 that would be contrary to this. Amazing -- to me it was  
2 -- it was -- because to me, Jack Posobiec is extremely  
3 dangerous. And so I found it to be very interesting  
4 that -- that Jack Posobiec was interrogating detainees  
5 in Guantanamo while he was under the command of Mike  
6 Flynn.

7 Q And what -- where did you look for this  
8 contrary information?

9 A On the internet.

10 Q Do you remember any of the sources?

11 A I -- I don't recall the specific things that I  
12 looked at.

13 Q Do you recall any of them?

14 A There were -- there were articles, again, from  
15 the Philly Inquirer, I think was one, that was -- that  
16 quoted Jack Posobiec.

17 Q I just want to then look at the ninth  
18 affirmative defense here on the 14th page where it says:

19 People or entities other than the Defendant  
20 caused or contributed to any damages to -- Plaintiff  
21 claims to have suffered.

22 Are you aware of who these people or entities  
23 are that you claim contributed to any damage to General  
24 Flynn?

25 A I -- I'm sorry. I need you to explain that

1 question to me. I -- I don't --

2 Q Yeah. So you submit that people or entities  
3 other than yourself are the ones who caused or  
4 contributed to General Flynn's harm. And so my question  
5 is, who were those people or entities other than  
6 yourself that contributed or caused harm?

7 MR. THURLOW: Objection. It calls for  
8 (indiscernible - simultaneous speech) conclusion.

9 THE WITNESS: I'm sorry. I don't know  
10 what harm you're talking about.

11 BY MR. ROBERTS:

12 Q So you're not aware of any other person or  
13 entity that caused or contributed to harm General Flynn?

14 A I -- I am not aware of anyone trying to cause  
15 harm to General Flynn.

16 Q All right. And looking at your eighth  
17 affirmative defense, where you say, "Any or all of  
18 Defendant's statements are true," is it true that Mike  
19 Flynn is a Nazi?

20 A Yes, in my opinion.

21 Q Is it true that Mike Flynn wants a second  
22 Holocaust?

23 A Yes, in my opinion.

24 Q Is it true that Mike Flynn literally tried to  
25 murder Mike Pence?

1           A     With QAnon, yes, in my opinion.

2           Q     Is it true that Mike Flynn employed Jack  
3     Posobiec to torture prisoners at Guantanamo?

4           A     Yes. According to what is public, what Jack  
5     Posobiec said himself.

6           Q     Mr. Stewartson, your defense says that these  
7     statements are true, not just in your opinion, but that  
8     they are true. Is there a difference there?

9                     MR. THURLOW: Objection insofar as it  
10    calls for legal conclusions.

11                    You can answer.

12                    THE WITNESS: Can you ask again.

13    BY MR. ROBERTS:

14           Q     Yes. So your affirmative defense says these  
15    statements are true, but now you're saying, They're  
16    true, in my opinion. Is it your testimony that the  
17    statements are not true?

18                    MR. THURLOW: And I'll renew the  
19    objection.

20                    THE WITNESS: No. It is not -- it is my  
21    opinion that these statements are true.

22    BY MR. ROBERTS:

23           Q     Is it -- is there a difference between "in  
24    your opinion" and whether it's outright true?

25                    MR. THURLOW: Objection insofar as it

1 calls for legal conclusions.

2 You can answer.

3 THE WITNESS: Determining what is -- what  
4 is metaphysical fact versus what somebody's opinion is  
5 is a -- is a philosophical question. I -- I believe  
6 that those statements are true. And I believe that any  
7 fact-finding mission would come to the same conclusion.  
8 So, you know, they -- they -- those -- the statements  
9 are my opinions. I also believe that they are facts,  
10 that they are true.

11 BY MR. ROBERTS:

12 Q Okay. So I'm going to close out of these.  
13 And I have a handful of posts that I just want to go  
14 through with you. I actually don't have much further  
15 once we get beyond these posts.

16 MR. ROBERTS: So starting with this.  
17 We'll share this, and we can mark this as Plaintiff's  
18 Exhibit 8.

19 (Plaintiff's Exhibit 8 marked for identification.)

20 BY MR. ROBERTS:

21 Q This appears to be a post from August 10,  
22 2021. Do you recognize this post?

23 A No. But I -- I'm sure it was -- I -- I -- it  
24 could be.

25 Q Is this --

1           A     I have no reason to doubt that -- that I would  
2 tweet that. Joe Flynn harassed me for years.

3           Q     And @jimstewartson is your X/Twitter account?

4           A     Yeah. Yes.

5           Q     Okay. And do you have any reason to believe  
6 that somebody else might have posted this?

7           A     No.

8           Q     And in it you wrote, "Shit. What am I  
9 supposed to do with Joe Flynn's cell phone number?"  
10 Correct?

11          A     Yes.

12          Q     And do you understand Joe Flynn to be General  
13 Flynn's brother?

14          A     I certainly do.

15          Q     Were you in possession of Joe Flynn's cell  
16 phone number?

17          A     I -- I think it was because he texted me, but  
18 I -- I -- again, this is four years ago. I don't recall  
19 this particular incident. But -- but Joe Flynn sent me  
20 over a hundred emails, harassing me. He -- he called me  
21 a bean pole faggot. Was a specific term that he used  
22 for me over and over and over again in his personal  
23 emails to me.

24                   And it may have been that when -- that he  
25 texted me some harassment at this point. But I don't

1 actually recall that. And I have never in my life  
2 published somebody's personal information.

3 MR. ROBERTS: Okay. So close out of this  
4 one. And next one, which we can mark as Plaintiff's  
5 Exhibit 9.

6 (Plaintiff's Exhibit 9 marked for identification.)

7 BY MR. ROBERTS:

8 Q This post appears from August 12, 2021. Do  
9 you recognize this post, Mr. Stewartson?

10 A Same. This -- this is -- seems -- this seems  
11 to be from the same period of time where I was defending  
12 myself from Joseph Flynn and the incredible amounts of  
13 harassment that he was sending my way.

14 Q Do you have any reason to doubt whether you  
15 made this post?

16 A No.

17 Q And in it you wrote, "Any Flynn will do they  
18 all suck," correct?

19 A I did, apparently.

20 MR. ROBERTS: All right. We can move on  
21 to the next one. We can mark this as Plaintiff's  
22 Exhibit 10.

23 (Plaintiff's Exhibit 10 marked for identification.)

24 BY MR. ROBERTS:

25 Q This appears to be a post from August 31,

1 2021. Do you recognize this post, Mr. Stewartson?

2 A Vaguely. Yes. No. I remember -- I remember  
3 this incident when Mike Flynn had his credit cards  
4 turned off.

5 Q And did you make this post?

6 A I'm sure I did.

7 Q Do you have any reason to doubt that you did?

8 A No.

9 MR. ROBERTS: We can move on to the next  
10 one. Here we can mark this as Plaintiff's Exhibit 11.

11 (Plaintiff's Exhibit 11 marked for identification.)

12 BY MR. ROBERTS:

13 Q This appears to be a post from November 8,  
14 2021. Do you recognize this post, Mr. Stewartson?

15 A Yes. I mean, I -- vaguely, but -- but yes.  
16 I'm sure that was mine.

17 Q And did you make this post?

18 A Again, I -- I don't recall it in particular,  
19 but I believe that it is. I have no reason not to  
20 believe that it is my post.

21 MR. ROBERTS: Okay. I'll close this one.  
22 This next one we can mark as Plaintiff's Exhibit 12.

23 (Plaintiff's Exhibit 12 marked for identification.)

24 BY MR. ROBERTS:

25 Q This is from February 8, 2023. Do you

1 recognize this post?

2 A Vaguely.

3 Q Did you make this post?

4 A I'm sure I did. I -- I recall that -- that  
5 when Joe was harassing me, that the subject of his  
6 mother came up.

7 MR. ROBERTS: All right. Close this one  
8 out. This one we can mark as Plaintiff's Exhibit 13.

9 (Plaintiff's Exhibit 13 marked for identification.)

10 BY MR. ROBERTS:

11 Q This appears from April 27, 2023. Do you  
12 recognize this post, Mr. Stewartson?

13 A Vaguely. Yes. I mean, I remember when --  
14 yeah. I -- I recall this incident, and that certainly  
15 seems like something that I would have written and  
16 probably did.

17 Q Okay. And in it you wrote the only correction  
18 was that you said General Flynn was a follower of Satan.  
19 Did you mean that to mean that all other statements  
20 contained in that letter were accurate?

21 A It -- it was a -- it -- it was a -- I -- I was  
22 not representing anything legally at that point. I got  
23 -- I was served with a -- a lawsuit, and I found it  
24 funny that -- that I was being charged with calling Mike  
25 Flynn a follower of Satan, which I wasn't. The -- the

1 other things -- and -- and, again, I -- I'd have to go  
2 and -- and look at all of the language here, but I  
3 believe most of these other things are the -- the  
4 statements that were in the lawsuit question.

5 MR. ROBERTS: Okay. So close this one  
6 out. And another post which we can mark Plaintiff's  
7 Exhibit 14, and this appears from September 10, 2021.

8 (Plaintiff's Exhibit 14 marked for identification.)

9 BY MR. ROBERTS:

10 Q Do you recognize this post, Mr. Stewartson?

11 A Again, same answer. I'm sure -- I'm sure I  
12 did post that.

13 Q Do you have any reason to doubt whether you  
14 posted this?

15 A No.

16 MR. ROBERTS: We can close that. And  
17 another post which we can mark as Plaintiff's Exhibit  
18 15, and this is from January 30, 2024.

19 (Plaintiff's Exhibit 15 marked for identification.)

20 BY MR. ROBERTS:

21 Q Mr. Stewartson, do you recognize this post?

22 A Yes.

23 Q Okay. Is this a post that you made?

24 A I'm sure it is. Again, I was quote tweeting  
25 an update from this case. So I'd have to look into all

1 of this. Yes. So these are the four -- if you look at  
2 the -- the -- what I am quote tweeting, it is the four  
3 statements that are at -- at issue right now.

4 MR. ROBERTS: Okay. I'll close this  
5 document. This next one we can mark as Plaintiff's  
6 Exhibit 16.

7 (Plaintiff's Exhibit 16 marked for identification.)

8 BY MR. ROBERTS:

9 Q And this looks to be the post that you were  
10 quote, tweeting from January 30, 2024. Do you recognize  
11 this post?

12 A Yes.

13 Q Okay. And did you make this post?

14 A I'm sure I did.

15 Q Okay. Close this out. All right.

16 THE PROCEEDINGS OFFICER: If you have any  
17 more attorney, just --

18 MR. ROBERTS: I have -- I have about five  
19 more.

20 THE PROCEEDINGS OFFICER: Okay. I was  
21 just going to say, just before you close it out, I want  
22 to make sure that I'm done marking it.

23 MR. ROBERTS: Oh, my apologies.

24 THE PROCEEDINGS OFFICER: Okay. Thank  
25 you.

1                   MR. ROBERTS: Do you need me to go back  
2 to any of them?

3                   THE PROCEEDINGS OFFICER: No. Some of  
4 them are just going to have big marks because I didn't  
5 have a chance to minimize it, make it smaller. So I  
6 just have to play with it a little bit.

7                   MR. ROBERTS: Okay. Understood. I  
8 appreciate you.

9                   THE PROCEEDINGS OFFICER: Okay. Thank  
10 you.

11                   MR. ROBERTS: All right. So this next  
12 one we can mark as Plaintiff's Exhibit 17.

13                   (Plaintiff's Exhibit 17 marked for identification.)

14 BY MR. ROBERTS:

15           Q       This appears to be a post from September 6,  
16 2024. Do you recognize this post, Mr. Stewartson?

17           A       Vaguely. Again, I'm sure I -- I was quote  
18 tweeting Mike Flynn's statement that, you know, Jews  
19 should have fought harder in World War II.

20           Q       Do you have any reason to doubt whether you  
21 made this post?

22           A       No.

23                   MR. ROBERTS: All right. Close this.  
24 All right. This next one we can mark as Plaintiff's  
25 Exhibit 18.

1 (Plaintiff's Exhibit 18 marked for identification.)

2 BY MR. ROBERTS:

3 Q This is from September 29, 2025. Do you  
4 recognize this post, Mr. Stewartson?

5 A Vaguely. Yes.

6 Q This would have --

7 A It was a couple of days ago. Yeah.

8 Q Yes, sir.

9 A Yeah.

10 Q Okay. Did you make this post?

11 A I'm sure I did.

12 Q Do you have any reason to doubt whether you  
13 did?

14 A No.

15 MR. ROBERTS: All right. Here's a post  
16 we can mark as Plaintiff's Exhibit 19.

17 (Plaintiff's Exhibit 19 marked for identification.)

18 BY MR. ROBERTS:

19 Q This appears -- I apologize. I don't have the  
20 date on there, but it appears to be from December 2023.  
21 Do you recognize this post at all, Mr. Stewartson?

22 A I don't, but I don't believe -- I don't  
23 disbelieve that it was mine.

24 Q Okay. Do you have any reason to doubt whether  
25 you posted this?

1           A     No.  Again, I -- I don't, but I -- I don't  
2  remember it.

3                         MR. ROBERTS:  Okay.  All right.  This  
4  next post, which we can mark as Plaintiff's Exhibit 20.

5           (Plaintiff's Exhibit 20 marked for identification.)

6  BY MR. ROBERTS:

7           Q     And it appears to be a response from you on  
8  September 10, 2025.  Do you recall this post?  Or do you  
9  recognize this post, Mr. Stewartson?

10          A     I do.

11          Q     Okay.  And did you make this post?

12          A     I did.

13                         MR. ROBERTS:  Okay.  Close this out.  Oh,  
14  I'm sorry.  I -- do I need to reopen it?

15                         THE PROCEEDINGS OFFICER:  Don't close it  
16  just yet.

17                         MR. ROBERTS:  Okay.  Sorry.  I was --

18                         THE PROCEEDINGS OFFICER:  Are you -- are  
19  you able to see my markings when I mark it?

20                         MR. ROBERTS:  Yes.

21                         THE PROCEEDINGS OFFICER:  Okay.  So if  
22  it's not there, I'm not quite done.

23                         MR. ROBERTS:  My apologies on that.  You  
24  just told me, and I completely --

25                         THE PROCEEDINGS OFFICER:  Okay.  I'm done

1 with that one now. Thank you.

2 MR. ROBERTS: Thank you so much.

3 And this is the final post I wanted to  
4 show you, which we can mark as Plaintiff's Exhibit 21.

5 (Plaintiff's Exhibit 21 marked for identification.)

6 BY MR. ROBERTS:

7 Q And this appears from September 15, 2025. Do  
8 you recognize this post, Mr. Stewartson?

9 A I do.

10 Q Okay. And did you make this post?

11 A I did.

12 Q Okay.

13 MR. ROBERTS: All right. If we can have  
14 just 10 minutes off the record so I can review my notes.

15 THE WITNESS: Fine with me.

16 THE PROCEEDINGS OFFICER: Off the record.  
17 The time is 2:41 p.m., Eastern Time.

18 (Off the record.)

19 THE PROCEEDINGS OFFICER: Okay. We're  
20 back on the record. The time is 3:01 p.m., Eastern  
21 Time.

22 BY MR. ROBERTS:

23 Q Mr. Stewartson, are you aware that you're  
24 still under oath?

25 A Yes. I am.

1 Q Okay. Is there anyone else that you have ever  
2 publicly stated is a literal Nazi?

3 A Jack Posobiec.

4 Q Anyone else?

5 A It's possible. I'm sure that there are  
6 literal Nazis, but I -- I can't recall them off the top  
7 of my head. But I'm sure I have.

8 MR. ROBERTS: Okay. Well, Mr.  
9 Stewartson, I have no further questions for you today.  
10 Your attorneys may have questions, but as of now, I have  
11 no -- nothing further.

12 EXAMINATION

13 BY MR. THURLOW:

14 Q Yes. I have a few questions for you, Jim.  
15 And I'm going to turn your attention -- I'm going to  
16 share what was marked as Plaintiff's Exhibit 1.

17 A Okay.

18 Q At the time you made the statement, Mr.  
19 Stewartson, did you know this statement to be false?

20 A No.

21 Q And at the time you made the statement, did  
22 you entertain any serious doubts about whether it was  
23 true or false?

24 A No.

25 Q All right. I'm now going to share what was

1 marked as Exhibit 2. I'm having some difficulty  
2 switching from Exhibits 1 to 2. It's --

3 MR. ROBERTS: Did you try closing for --  
4 you have to hit "Close For All," George.

5 MR. THURLOW: Where do you hit that?

6 MR. ROBERTS: Should be a bright red  
7 button below Live Exhibits.

8 MR. THURLOW: I don't have that button.

9 MR. ROBERTS: I might be able to close it  
10 for you. Let's see. Okay. I just closed it for you.

11 MR. THURLOW: Thank you.

12 MR. ROBERTS: Yeah.

13 BY MR. THURLOW:

14 Q Yeah. So our next one is going to be  
15 Plaintiff's Exhibit 2. Mr. Stewartson, at the time you  
16 made this tweet, did you know that this statement was  
17 false?

18 A No.

19 Q And at the time you made this statement, did  
20 you have any serious doubts about whether it was true or  
21 false?

22 A Not at all.

23 Q All right. And I'm going to now have to  
24 switch to Exhibit 3.

25 MR. ROBERTS: Do you need me to close it

1     again, George?

2                     MR. THURLOW:   Yeah.

3                     MR. ROBERTS:   Okay.  I'll just -- you let  
4     me know when you're done, and I'll close.

5                     MR. THURLOW:   All right.

6     BY MR. THURLOW:

7             Q     We're now looking at Exhibit 3.  Mr.  
8     Stewartson, at the time you made the statement, did you  
9     know the statement was false?

10            A     No.

11            Q     And at the time you made the statement, do you  
12     have any serious doubts about whether it was true or  
13     false?

14            A     No.

15                     MR. THURLOW:   All right.  Can you stop  
16     sharing, Jared.

17     BY MR. THURLOW:

18            Q     We're going to go to Exhibit 4.  Mr.  
19     Stewartson, at the time you made the statement, did you  
20     know that the statement was false?

21            A     No.

22            Q     And at the time, did -- you made the  
23     statement, did you entertain any serious doubts about  
24     whether the statement was true or false?

25            A     No.

1 Q Can you stop sharing, please. I'm just trying  
2 to remember what -- (mumbling). Give me a second. I'm  
3 going to share Exhibit 7 with you, Mr. Stewartson. I  
4 believe it's going to be page 13. Let's -- yes.

5 A Get there. Okay.

6 Q Do you see what is labeled "Second Affirmative  
7 Defense", Mr. Stewartson?

8 A Yes. Let me read it.

9 Q Oh, yeah. Please go ahead and read it.

10 A Yes.

11 Q Is it your position that the four statements  
12 that are subject to this litigation are protected  
13 opinion speech?

14 A Yes.

15 MR. ROBERTS: Objection. Form.

16 MR. THURLOW: No further questions.

17 MR. ROBERTS: Just -- could we go off the  
18 record for just five minutes.

19 THE PROCEEDINGS OFFICER: Okay. One  
20 moment. We're off the record. The time is 3:06 p.m.,  
21 Eastern Time.

22 (Off the record.)

23 THE PROCEEDINGS OFFICER: Okay. We're  
24 back on the record. The time is 3:11 p.m., Eastern  
25 Time.



1 MR. THURLOW: Nothing further on our end.

2 THE PROCEEDINGS OFFICER: Witness read  
3 and sign the transcript if ordered?

4 MR. THURLOW: We'll read.

5 THE PROCEEDINGS OFFICER: Okay.

6 And Atty. Roberts, a copy of the  
7 transcript is included with your order. I would like to  
8 confirm if you would like for us to go ahead and produce  
9 that for you.

10 MR. ROBERTS: Yes, please.

11 THE PROCEEDINGS OFFICER: Okay.

12 And Atty. Thurlow, will you be purchasing  
13 a copy of the transcript?

14 MR. THURLOW: Yeah. I'll take a copy.

15 THE PROCEEDINGS OFFICER: Okay. Thank  
16 you. I just -- when we're off the record, I just have a  
17 couple of questions about spellings. Okay? So I'll go  
18 ahead and take us off the record.

19 We're now off the record. The time is  
20 3:13 p.m., Eastern Time.

21 (Proceedings concluded at 3:13 p.m., ET)

22 \* \* \* \* \*

23

24

25

1 CERTIFICATE OF PROCEEDINGS OFFICER

2

3 I, Audrey Hall, hereby certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place therein set forth;

6 That the proceedings were recorded by me and  
7 thereafter formatted into a full, true, and correct  
8 transcript of same;

9 I further certify that I am neither counsel  
10 for nor related to any parties to said action, nor in  
11 any way interested in the outcome thereof.

12

13 DATED, this 16th day of October 2025.

14



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Audrey Hall

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CDR-3539

19

Proceedings Officer

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A C K N O W L E D G M E N T

I do hereby certify that having been first  
duly sworn to testify to the truth, I gave the above  
testimony on October 2, 2025.

I further certify that the foregoing  
transcript is a true and correct transcript of the  
testimony given by me at the time and place specified.

\_\_\_\_\_

JAMES ARTHUR STEWARTSON

Sworn to before me this \_\_\_ day of \_\_\_\_\_, 20\_\_

\_\_\_\_\_

Notary Public



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IN THE TWELFTH JUDICIAL CIRCUIT COURT  
IN AND FOR SARASOTA COUNTY, FLORIDA

MICHAEL T FLYNN,  
Plaintiff,

v.

CASE NO. 2023 CA 004264 NC  
DIVISION C CIRCUIT

JIM STEWARTSON,  
RICK WILSON,  
MEIDASTOUCH LLC,  
Defendant.

---

**ORDER SETTING HEARING**

**YOU ARE NOTIFIED** that a Court hearing is scheduled in this case before the Honorable Hunter W. Carroll, as follows:

**Date & Time:** February 24, 2026 at 09:45 a.m.

**Time Reserved:** 15 minutes

**Matter(s):** Case management conference

**Is hearing evidentiary?** No

Judge Carroll has a “hybrid courtroom,” which will allow participants to either appear “in person” or via Zoom.

- For all non-evidentiary hearings and for evidentiary hearings one hour or less, each participant has the discretion to determine how that participant will appear.
- For evidentiary hearings exceeding one hour, the participants must appear in person unless the Court orders otherwise.

Please do **not** call the Court’s Judicial Assistant to advise how the participant will appear. Instead, Judge Carroll expects the participants to appear on-time, either in person or via Zoom.

**Courthouse location:** Lynn N. Silvertooth Judicial Center - 2002 Ringling Blvd. - Sarasota - FL 34237

**Courtroom:** 6-C

**Zoom Credentials:**            <https://www.zoom.us/> Click “Join A Meeting”  
**Meeting ID:** 353 234 4884  
**Password:** 756433  
**Audio only:** 1.253.215.8782 and use the same Meeting ID

There are no fees for attending this court hearing via the Zoom platform. You may access the Zoom platform at <https://www.zoom.us/>. Please select the “Join A Meeting” link and then enter the Meeting ID and Password to access the hearing. You may also join the court hearing from Judge Carroll’s Zoom Video Conference Access Information page at <https://www.jud12.flcourts.org/Public-Information/Public-Court-Hearings>.

Court proceedings are open to the public. Members of the public may appear live or use the Zoom credentials to access the hearing. Judge Carroll will “host” the videoconference. When you sign on, you be placed in a waiting room. The Court will admit you at the beginning of the hearing. Please name your video feed with your first and last name.

### **Expectations for All Participants Attending Zoom Hearings**

Please see the expectations for all participants on the Twelfth Judicial Court Website: <https://www.jud12.flcourts.org/Public-Information/Public-Court-Hearings>.

### **Court Reporters and Digital Court Recording**

The Court does not provide a court reporter. If a party wishes to have a court reporter present, that party must arrange for the court reporter’s attendance and must notify all other parties before the hearing.

You are advised that the Court may record this proceeding via the Court’s Digital Court Recording Department. Not all hearings are digitally recorded, however. Those hearings before Judge Carroll that generally are recorded using Digital Court Recording include termination of parental rights; certain guardianship proceedings (appointment of a guardian; adjudication, modification, termination, or revocation of adjudication of incapacity; and restoration of rights); Uniform Child Custody Jurisdiction and Enforcement Act hearings; and Temporary Restraining Order hearings.

### **No Recording Proceedings**

By court rule and court order, you are not authorized to make your own audio or visual recording of a court proceeding. No one may take “screenshots” or other audio or visual depictions of a court proceeding. Recording a court proceeding is strictly prohibited unless approved by the Judge. If you violate these rules, you may be held in contempt of court. Members of the media must comply with rule 2.450 and administrative order 2020-23.2 regarding media coverage. Please contact the Court’s Public Information Officer for further information.

### **Late entry or Technical Difficulties**

If you are not logged in when the hearing begins, the judge may not interrupt the proceedings to admit you to the hearing. If you have trouble logging in, and you wish to participate in the hearing, contact the Court's judicial assistant immediately at (941) 861-7946.

### **ADA Notice**


If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Sarasota County Jury Office, P.O. Box 3079, Sarasota, Florida 34230-3079, (941) 861-8000, at least seven (7) days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven (7) days; if you are hearing or voice impaired, call 711.

### **Interpreters**

The Twelfth Judicial Circuit provides spoken language court interpreters to limited-English-proficient persons in accordance with Title VI of the Civil Rights Act of 1964, section 90.606, Florida Statutes, and Rule 2.560, Florida Rules of Judicial Administration. If you require the assistance of an interpreter, please submit your request to: <https://www.jud12.flcourts.org/Programs/Court-Interpreters/Interpreter-Request> or please call 941-749-3659. Please submit your request as early as possible, requests made with less than 5 business days' notice may not be accommodated.

El Duodécimo Circuito Judicial provee intérpretes judiciales de la lengua hablada a personas con dominio limitado del inglés de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la sección 90.606, los Estatutos de la Florida y la Regla 2.560 de las Reglas de Administración Judicial de la Florida. Si requiere la ayuda de un intérprete, por favor envíe su solicitud a <http://www.jud12.flcourts.org/Home/Public/InterpreterRequestForm.aspx> o llame al 941-749-3659. Por favor, envíe su solicitud lo antes posible, las solicitudes hechas con menos de 5 días hábiles no pueden ser garantizadas.

**DONE AND ORDERED** in Sarasota, Sarasota County, Florida, on February 20, 2026.

  
2/20/2026 2:44 PM 2023 CA  
004264 NC  
e-Signed 2/20/2026 2:44 PM 2023 CA 004264 NC

**HUNTER W CARROLL**  
Circuit Judge

### **SERVICE CERTIFICATE**

On February 20, 2026, the Court caused the foregoing document to be served via the Clerk of Court's case management system, which served the following individuals via email (where indicated). On the same date, the Court also served a copy of the foregoing document via First Class U.S. Mail on the individuals who do not have an email address on file with the Clerk of Court.

STEPHEN B FRENCH  
717 KING STREET  
SUITE 200  
ALEXANDRIA, VA 22314  
CRAIG A WHISENHUNT  
8130 66TH ST. N  
SUITE 3  
PINELLAS PARK, FL 33781

JARED J ROBERTS  
717 KING ST STE 200  
ALEXANDRIA, VA 22314

GEORGE A D THURLOW  
535 CENTRAL AVE STE 200  
ST. PETERSBURG, FL 33701

IN THE TWELFTH JUDICIAL CIRCUIT COURT  
IN AND FOR SARASOTA COUNTY, FLORIDA

MICHAEL T FLYNN,  
Plaintiff,

v.

CASE NO. 2023 CA 004264 NC  
DIVISION C CIRCUIT

JIM STEWARTSON,  
RICK WILSON,  
MEIDASTOUCH LLC,  
Defendant.

---


**ORDER FROM CASE MANAGEMENT**

The Court conducted a case management conference in this case on February 24, 2026. Based on that conference—

IT IS ORDERED:

1. The Court reminds that due to the age of this case that this case *will be tried* this upcoming 3-week trial period.
2. The parties shall timely reach out to the provided Sarasota Sheriff's Office contact sooner as opposed to later relating to any security issues that need to be addressed with respect to security concerns either party may have.
3. The Court denies Defendant's request for leave to file a motion for summary judgment.
4. The Court grants Defendant's request for leave to file the second sanctions motion. That motion, although filed, will not be addressed before trial.
5. Mr. Thurlow is to cancel the March 9, 2026, hearing that was set on DIN 245 because the Court addressed that motion at the case management conference.
6. The parties will mediate this case on or before March 11, 2026.

DONE AND ORDERED in Sarasota, Sarasota County, Florida, on February 24, 2026.

  
2/24/2026 10:25 AM 2023 CA  
004264 NC  
e-Signed 2/24/2026 10:25 AM 2023 CA 004264 NC

**HUNTER W CARROLL**  
Circuit Judge

**SERVICE CERTIFICATE**

On February 24, 2026, the Court caused the foregoing document to be served via the Clerk of Court's case management system, which served the following individuals via email (where indicated). On the same date, the Court also served a copy of the foregoing document via First Class U.S. Mail on the individuals who do not have an email address on file with the Clerk of Court.

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ALEXANDRIA, VA 22314

GEORGE A D THURLOW  
535 CENTRAL AVE STE 200  
ST. PETERSBURG, FL 33701

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT IN AND FOR SARASOTA COUNTY, FLORIDA  
 IN THE COUNTY COURT IN AND FOR SARASOTA COUNTY, FLORIDA

### COURT APPEARANCE RECORD

DIVISION: DIVISION C CIRCUIT

CASE NUMBER: 2023 CA 004264 NC

PLAINTIFF(S):  
MICHAEL T FLYNN

VS. DEFENDANT(S):  
JIM STEWARTSON  
RICK WILSON  
MEIDASTOUCH LLC

COURT EVENT: MOTIONS  
JUDGE: HUNTER W CARROLL

DATE: Tuesday, February 24, 2026  
TIME: 09:45 AM

#### APPEARANCE:

##### PLAINTIFF

MICHAEL T FLYNN

DID NOT APPEAR     APPEARED PRO SE     APPEARED WITH ATTORNEY     ATTORNEY ONLY  
ATTORNEY NAME: Jared Roberts, Stephen French

##### DEFENDANT

JIM STEWARTSON

DID NOT APPEAR     APPEARED PRO SE     APPEARED WITH ATTORNEY     ATTORNEY ONLY  
ATTORNEY NAME: George Thurlow, Craig Whisenhunt

RICK WILSON

DID NOT APPEAR     APPEARED PRO SE     APPEARED WITH ATTORNEY     ATTORNEY ONLY  
ATTORNEY NAME: \_\_\_\_\_

MEIDASTOUCH LLC

DID NOT APPEAR     APPEARED PRO SE     APPEARED WITH ATTORNEY     ATTORNEY ONLY  
ATTORNEY NAME: \_\_\_\_\_

COURT REPORTER: Angela Beltran (milestone)

#### PETITIONS / MOTIONS:

PLAINTIFF'S     DEFENDANT'S  
 PETITION     MOTION  
DIN# Case management conference

#### RULINGS:

GRANTED     DENIED     CONTINUED  
 GRANTED / DENIED IN PART     CANCELLED  
 TAKEN UNDER ADVISEMENT  
 OTHER \_\_\_\_\_

PLAINTIFF'S     DEFENDANT'S  
 PETITION     MOTION  
DIN# 245 - For leave to file motion for final summary judgment & second motion

GRANTED     DENIED     CONTINUED  
 GRANTED / DENIED IN PART     CANCELLED  
 TAKEN UNDER ADVISEMENT  
 OTHER \_\_\_\_\_

SUPPLEMENTAL PAGE ATTACHED For sanctions

COURT COMMENTS: 5-day Jury Trial. Counsel to contact Lieutenant Damer with any security issues or questions. The court directs parties to mediation prior to docket sounding, trial to remain as set. Atty Thurlow to cancel 3/9 Hearing.

KAREN E. RUSHING CLERK OF THE CIRCUIT COURT  
BY: T. Antunez, Deputy Clerk  
DATE: February 24, 2026

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA  
CIVIL DIVISION**

Michael T. Flynn,  
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson,  
Defendant.

\_\_\_\_\_ /

**NOTICE OF CANCELLATION OF HYBRID HEARING**

The Defendant, JIM STEWARTSON, hereby gives notice of the cancellation of the hearing scheduled on March 9, 2026 at 10:30 a.m. before the Honorable Hunter Carroll and requests that the Court remove said hearing from the docket.

Dated: February 24, 2026

/s/ George A.D. Thurlow

George A.D. Thurlow, Esquire  
FBN 1019960

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and proper copy of the foregoing document was served upon Jared Roberts, Esquire [jared@binnall.com](mailto:jared@binnall.com), Stephen B. French, Esquire [stephen@binnall.com](mailto:stephen@binnall.com) and Craig a. Whisenhunt, Esquire [craig@rwrlawfirm.com](mailto:craig@rwrlawfirm.com) [efiling@rightingwrongsflorida.com](mailto:efiling@rightingwrongsflorida.com) via Florida E-Filing Portal on this 24<sup>th</sup> day of February 2026.

/s/ George A.D. Thurlow

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