

THOMAS SCHOENBERGER

December 1, 2015

1 (Pages 1 to 4)

1	<p>1 SUPERIOR COURT OF THE STATE OF CALIFORNIA</p> <p>2 COUNTY OF LOS ANGELES</p> <p>3</p> <p>4 ISABELLE GAUTHIER, an)</p> <p>5 individual,)</p> <p>6)</p> <p>7 Plaintiff,)</p> <p>8)</p> <p>9 vs.) No. BC564759</p> <p>10)</p> <p>11 THOMAS SCHOENBERGER, an)</p> <p>12 individual, et al.,)</p> <p>13)</p> <p>14 Defendants.)</p> <p>15 _____)</p> <p>16</p> <p>17 DEPOSITION OF: THOMAS SCHOENBERGER</p> <p>18 TAKEN ON: DECEMBER 1, 2015</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 REPORTED BY:</p> <p>25 PATRICIA L. HUBBARD, CSR #3400</p>	3
2	<p>1 DEPOSITION OF THOMAS SCHOENBERGER,</p> <p>2 taken on behalf of the Plaintiff,</p> <p>3 at 2665 Main Street, Suite 240B,</p> <p>4 Santa Monica, California,</p> <p>5 commencing at 9:33 A.M. on</p> <p>6 December 1, 2015, before</p> <p>7 PATRICIA L. HUBBARD, CSR #3400, a</p> <p>8 Certified Shorthand Reporter in</p> <p>9 and for the State of California,</p> <p>10 pursuant to Notice.</p> <p>11</p> <p>12 APPEARANCES OF COUNSEL:</p> <p>13</p> <p>14 For the Plaintiff:</p> <p>15</p> <p>16 WITTENBERG LAW, APC</p> <p>17 BY: JEFFREY WITTENBERG, ESQ.</p> <p>18 2665 Main Street</p> <p>19 Suite 240B</p> <p>20 Santa Monica, California 90405</p> <p>21 310.295.2010</p> <p>22 jeffrey@wittenberglawyers.com</p> <p>23</p> <p>24 For the Defendant:</p> <p>25</p> <p>26 LAW OFFICES OF HEYWOOD G. FRIEDMAN</p> <p>27 BY: JAY PARMELEE, ESQ.</p> <p>28 31416 Agoura Road</p> <p>29 Suite 200</p> <p>30 Westlake Village, California 91361</p> <p>31 818.707.1488</p> <p>32 jay@friedmanlawoffices.com</p>	4
1	<p>1 APPEARANCES OF COUNSEL: (Continued)</p> <p>2</p> <p>3 Also Present:</p> <p>4</p> <p>5 Ellana Ellis</p> <p>6</p> <p>7 Isabelle Gauthier</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	3
1	<p>1 I N D E X</p> <p>2</p> <p>3 WITNESS PAGE</p> <p>4 THOMAS SCHOENBERGER</p> <p>5 (By Mr. Wittenberg) 7</p> <p>6</p> <p>7</p> <p>8</p> <p>9 E X H I B I T S</p> <p>10 PAGE</p> <p>11 PLAINTIFF'S DESCRIPTION REFERENCED</p> <p>12</p> <p>13 Exhibit 1 Email chain dated June 17, 137</p> <p>14 2014 from Schoenberger to</p> <p>15 Gauthier</p> <p>16</p> <p>17 Exhibit 2 Thomas Schoenberger LinkedIn Page 161</p> <p>18</p> <p>19 Exhibit 3 Wells Fargo Bank records 175</p> <p>20</p> <p>21 Exhibit 4 Email chain dated June 29, 180</p> <p>22 2014 from Schoenberger to</p> <p>23 Gauthier</p> <p>24</p> <p>25 Exhibit 5 Email chain dated July 4, 205</p> <p>26 2014 from Schoenberger to</p> <p>27 Gauthier</p> <p>28</p> <p>29 Exhibit 6 Email chain dated July 15, 217</p> <p>30 2014 from Sophia Musik to</p> <p>31 Gauthier</p> <p>32</p> <p>33 Exhibit 7 Email chain dated August 26, 265</p> <p>34 2014 from Schoenberger to</p> <p>35 Gauthier</p> <p>36</p> <p>37 Exhibit 8 Email chain dated August 30, 276</p> <p>38 2014 from Schoenberger to</p> <p>39 Gauthier</p> <p>40</p> <p>41</p> <p>42</p>	4

THOMAS SCHOENBERGER
December 1, 2015

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1 **A. Yes.**
 2 Q. Okay. So, when we're done today you
 3 will have a period of time to correct any testimony
 4 given today.
 5 If you make any changes, you understand
 6 that I will have the ability to note those changes
 7 for a jury or a judge at a later date to show that
 8 perhaps there are inconsistencies concerning your
 9 testimony.
 10 Do you understand that?
 11 **A. I understand that.**
 12 Q. Okay. So, let's start with your
 13 background.
 14 Where do you currently reside?
 15 **A. I reside in the City of Paso Robles.**
 16 Q. Okay. And where exactly? What address?
 17 **A. 813 Vista Cerro, C-e-r-r-o, Drive, Paso**
 18 **Robles, 93446.**
 19 Q. Okay. Is that the address listed on
 20 your driver's license?
 21 **A. No.**
 22 Q. Okay. Do you have a copy -- or your
 23 driver's license with you for us to copy?
 24 **A. I had one earlier. I didn't drive down**
 25 **here. The address that I have is old. Fortunately,**

10

1 **I drove -- I'm not driving today, but --**
 2 MR. WITTENBERG: Will you make a copy of
 3 that and bring it back.
 4 MS. ELLIS: Yes.
 5 MR. WITTENBERG: Thank you.
 6 BY MR. WITTENBERG:
 7 Q. So, prior to your current residence
 8 where did you reside?
 9 **A. I resided at 17170 Old Sonoma Highway,**
 10 **Sonoma, California 95476.**
 11 Q. Okay. And how long have you currently
 12 been residing in Paso Robles?
 13 **A. Since July of 2013.**
 14 Q. Okay.
 15 **A. July 9th.**
 16 Q. Okay. And so since July 9, 2013 till
 17 the present day you have always resided at Paso
 18 Robles; is that correct?
 19 **A. Let me be specific. Unless I was on the**
 20 **road, I resided there. So that was my primary**
 21 **residence.**
 22 Q. Okay. Did you ever live in Los Angeles?
 23 **A. No. In my life?**
 24 Q. Well, in the last five years have you
 25 lived in Los Angeles?

11

1 **A. No.**
 2 Q. Okay. Prior to your living -- I guess
 3 you gave us one address at 813 -- and I forget the
 4 street name, but in Paso Robles. And prior to that
 5 it was in Sonoma?
 6 **A. Yes.**
 7 Q. And what prior to that?
 8 **A. Fern Drive, which is on the license.**
 9 Q. Okay.
 10 **A. Is it possible to get that back?**
 11 Q. Yeah. Of course (indicating).
 12 **A. Great. Thank you.**
 13 Q. Thank you.
 14 So, in the past two years have you
 15 worked in Los Angeles?
 16 **A. Can you please define what you mean by**
 17 **"worked"?**
 18 **Have I been paid for efforts in**
 19 **Los Angeles?**
 20 Q. Well, I'm curious if you have been
 21 present in Los Angeles for any work that you
 22 performed in the last two years.
 23 **A. Work that I was compensated for or**
 24 **development? I'm -- I am developing projects.**
 25 Q. Were you presently physically in -- let

12

1 me strike that.
 2 Were you physically in Los Angeles for
 3 work within the last two years?
 4 **A. Yes.**
 5 Q. Okay. When?
 6 **A. Well, once again, Mr. Wittenberg, by**
 7 **work, I have to define it as development. So I**
 8 **can't remember every time. Like probably 20 times.**
 9 Q. So you travel to L.A., have been
 10 physically present in L.A., 20 times within the last
 11 two years?
 12 **A. Yes.**
 13 Q. Okay. Let's move to your work.
 14 Can you describe what your work is now?
 15 **A. Yes, I can. I'm attempting to develop a**
 16 **television deal, and the television deal would aptly**
 17 **be a science fiction drama with roots in the**
 18 **struggles that we see in today's society, i.e., the**
 19 **battle between security and privacy, and what I**
 20 **perceive as a revisitation of the crusades that**
 21 **happened around 1099 where you see different**
 22 **factions, Christians, Muslims, Jews, in a condition**
 23 **of heightened agitation.**
 24 Q. Do you currently work for yourself or
 25 for someone else?

13	<p>1 A. For myself.</p> <p>2 Q. You're self-employed?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And do you have a business that</p> <p>5 you operate out of or do you do it on your own</p> <p>6 individual name?</p> <p>7 A. On my own individual name. I'm</p> <p>8 primarily a composer, so I'm attempting to broaden</p> <p>9 the scope of what I do on this planet to include</p> <p>10 writing, development.</p> <p>11 Q. So, are you the owner of a business that</p> <p>12 is a corporation?</p> <p>13 A. No.</p> <p>14 Q. Are you the owner of a business that is</p> <p>15 formed as a limited liability company?</p> <p>16 A. No.</p> <p>17 Q. Okay. Are you the owner of any business</p> <p>18 formed as any type of organization or entity?</p> <p>19 A. No.</p> <p>20 Q. Okay.</p> <p>21 A. No. Nothing is formed. The goal is</p> <p>22 once you have a project that is optioned by a</p> <p>23 studio, that's where you can create a business, an</p> <p>24 L.L.C., a -- you know --</p> <p>25 Q. How long have you been self-employed?</p>	15	<p>1 deliberate fraud. He stole my business. At the</p> <p>2 same time he started to attack me on the internet.</p> <p>3 Q. Okay. Have you been paid for any work</p> <p>4 you've done in the last year?</p> <p>5 A. No.</p> <p>6 Q. Have you been paid for any work you've</p> <p>7 done in the last two years?</p> <p>8 A. No.</p> <p>9 Q. Have you been paid for any work you've</p> <p>10 done in the last three years?</p> <p>11 A. No.</p> <p>12 Q. Okay. Have you had any income in the</p> <p>13 last three years?</p> <p>14 A. No.</p> <p>15 Q. When was the last time you had income?</p> <p>16 A. Late 2011.</p> <p>17 Q. And how did you earn that income -- let</p> <p>18 me rephrase.</p> <p>19 What was the source of that income?</p> <p>20 A. The source of the income was that I was</p> <p>21 able to act as a facilitator between a purchaser of</p> <p>22 entertainment services and a musical group. So</p> <p>23 essentially I was given a commission.</p> <p>24 The last three years of my life I have</p> <p>25 been trying to develop projects that are large</p>
14	<p>1 A. 1992.</p> <p>2 Q. Okay. Is it correct that you've been a</p> <p>3 composer primarily since 1992?</p> <p>4 A. I was also an owner of an agency.</p> <p>5 Q. Okay. So you were primarily a composer</p> <p>6 since 1992; is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. But you also were an owner of an agency</p> <p>9 since 1992? Or when did that happen?</p> <p>10 A. From 1992 till 2008.</p> <p>11 Q. What was the name of that agency?</p> <p>12 A. North Bay Entertainment.</p> <p>13 Q. Okay. Was that formed as a corporation?</p> <p>14 A. It was not formed as a corporation. It</p> <p>15 was a sole proprietorship.</p> <p>16 Q. It was a company that you were doing</p> <p>17 business as or a dba?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Were there any other owner in</p> <p>20 that business besides you?</p> <p>21 A. There was not. In 2008 a gentleman who</p> <p>22 is now deceased made me an offer to buy in. And</p> <p>23 unfortunately what he did is he put the name of my</p> <p>24 business under his own personal name.</p> <p>25 So it was -- how can I put it? -- a</p>	16	<p>1 scale, too, so --</p> <p>2 Q. So you've had no income from your music</p> <p>3 compositions --</p> <p>4 A. No.</p> <p>5 Q. -- in the last --</p> <p>6 A. No.</p> <p>7 Q. When was the last time you earned --</p> <p>8 Have you ever earned royalties from your</p> <p>9 compositions?</p> <p>10 A. 2010 I had --</p> <p>11 Q. Let me start over on -- just back up</p> <p>12 with the -- your work as a composer.</p> <p>13 What is it that you do in your work as a</p> <p>14 composer?</p> <p>15 A. Well, a composer composes music. What</p> <p>16 I'm attempting to do is create a cryptogramic</p> <p>17 language through music that would be the first time</p> <p>18 anybody has done that long term. In other words,</p> <p>19 using music as an alphabet.</p> <p>20 I don't know if you're aware of --</p> <p>21 Q. So, do you write music?</p> <p>22 A. Yes.</p> <p>23 Q. And do you play music?</p> <p>24 A. Yes.</p> <p>25 Q. And how do you -- on what instrument do</p>

17

1 you play music?
 2 **A. I compose on piano, but it's -- it's up**
 3 **here (indicating).**
 4 Q. Have you in the last, I guess -- when
 5 was the last time you composed new music?
 6 **A. 9 o'clock last night.**
 7 Q. Okay. Have you composed any music in
 8 the last year for any Hollywood movie?
 9 **A. No.**
 10 Q. What about the last two years?
 11 **A. No.**
 12 Q. When was the last time you composed --
 13 let me back up.
 14 Have you ever composed any music for a
 15 Hollywood production?
 16 Let me even broaden it.
 17 Have you ever composed any music for any
 18 film or TV production?
 19 **A. Mr. Wittenberg, you're asking me if I've**
 20 **composed something and I've been paid for it. Is**
 21 **that -- is that correct?**
 22 Q. Well, we already asked that, and you
 23 said not in the last five years or longer.
 24 **A. Yeah. The reason why --**
 25 Q. Now I'm asking you have you in the last

18

1 period of time -- when was the last time that you
 2 actually worked with a Hollywood producer to put
 3 your music into a production?
 4 **A. Last night.**
 5 Q. Okay. And who was that with? Which
 6 Hollywood production?
 7 **A. It's Michael Levine -- Michael Levine is**
 8 **one of the Governors of the Academy of Television**
 9 **Sciences. And we are developing a TV show right now**
 10 **where we've met with people from legendary so on and**
 11 **so forth.**
 12 **But to expound on what you were asking,**
 13 **if you go into the Uffizi Museum in Florence and you**
 14 **go to the Botticelli Room, Sandro Botticelli, if you**
 15 **look in the room where the Birth of Venus and the**
 16 **Annunciation is, they play my music on a lute. I am**
 17 **not compensated for this.**
 18 **But as I said, my music has been, you**
 19 **know, taken, stolen, used, the whole nine yards.**
 20 Q. Okay. And you mentioned Michael Levine.
 21 Do you work with him now on any project?
 22 **A. We are developing a television**
 23 **developmental deal.**
 24 Q. Do you have a contract with him?
 25 **A. Right now we have a verbal contract, but**

19

1 **we're -- until you -- the way that TV works is when**
 2 **you start to land a deal, that's where you put**
 3 **everything into a bilateral contract. So we've**
 4 **agreed to go through his lawyer. His lawyer is**
 5 **aware of everything that we're doing. And we**
 6 **quantify exactly what we're doing through our**
 7 **emails.**
 8 Q. So, just to summarize, since 1992 you've
 9 only worked for yourself as a composer, and then you
 10 operated a dba called --
 11 **A. North Bay Entertainment.**
 12 Q. -- North Bay Entertainment.
 13 And other than those two, I guess, ways
 14 of holding yourself out for business, since 1992
 15 you've held no employment with any company, correct?
 16 **A. Mr. Wittenberg, North Bay Entertainment**
 17 **was the largest agency of its kind in the entire**
 18 **North Bay. We literally -- literally generated 800**
 19 **to 900 contracts a year. So on any given weekend we**
 20 **would be servicing three or four corporate parties,**
 21 **seven or eight social media like weddings,**
 22 **engagements and that stuff. I --**
 23 Q. Where is the North Bay you're referring
 24 to?
 25 **A. North Bay Entertainment would be North**

20

1 **Bay, California. And we were located in Napa**
 2 **Valley. We had the cream of the crop.**
 3 Q. Okay. So this was focused on geography
 4 within Napa?
 5 **A. We did things all over.**
 6 Q. All over what?
 7 **A. Hired Tyra Banks for a party Hitachi PC**
 8 **in New York City. We would procure primarily within**
 9 **a geographic base, but Napa attracted the world.**
 10 **So what we did is that we had corporate**
 11 **accounts such as Silverado Country Club, Meadowood**
 12 **Resort, Auberge Du Soliel, A-u-b-e-r-g-e D-u**
 13 **S-o-l-e-i-l. It's French for Inn of the sun.**
 14 Q. And when did this business end?
 15 **A. 2008 was when the business was stolen**
 16 **by -- from --**
 17 Q. Okay. And who stole it? I just need
 18 his name.
 19 **A. Well, here. It's -- it's important --**
 20 **the gentleman on the left is -- with a gray beard is**
 21 **Steve Leflar. And that's the person. Him and his**
 22 **partner stole it from me.**
 23 **Steve is now deceased. He died on**
 24 **February 3rd of this year.**
 25 Q. And what about the partner?

21	<p>1 A. The partner is still around.</p> <p>2 Q. What's his name?</p> <p>3 A. Eric Symons. Eric --</p> <p>4 Q. Can you spell Symons for us?</p> <p>5 A. S-y-m-o-n-s.</p> <p>6 Q. Do you know where he resides?</p> <p>7 A. Rohnert Park. I don't know the exact</p> <p>8 address.</p> <p>9 Q. Do you have his contact information?</p> <p>10 A. I can get it. I don't have it off the</p> <p>11 top of my head.</p> <p>12 Q. Okay. Do you have Michael Levine's</p> <p>13 contact information?</p> <p>14 A. I have his phone number.</p> <p>15 Q. Okay.</p> <p>16 A. (310) 455-4455.</p> <p>17 Q. Do you know his email address?</p> <p>18 A. No, I don't. I can find it, but --</p> <p>19 Q. Do you email with him often?</p> <p>20 A. Yes.</p> <p>21 Q. Once a day?</p> <p>22 A. Yeah.</p> <p>23 Q. Multiple times a day?</p> <p>24 A. At times, yeah.</p> <p>25 Q. Okay.</p>	23
22	<p>1 A. But, Mr. Wittenberg, what I was going to</p> <p>2 say is you had asked his name. You asked Eric's</p> <p>3 name. They stopped my child. Both of them. They</p> <p>4 gang stocked the family --</p> <p>5 Q. They're not here to defend themselves.</p> <p>6 So, let's move on to this case, if you don't mind.</p> <p>7 The -- your educational background,</p> <p>8 where did you go to high school?</p> <p>9 A. Taft High School.</p> <p>10 Q. Okay. Where is that located?</p> <p>11 A. Woodland Hills, Winnetka and Ventura.</p> <p>12 Q. Okay. And what did you do after high</p> <p>13 school? Did you go to college?</p> <p>14 A. Went to Berkeley, audited classes.</p> <p>15 Q. And that was right after college?</p> <p>16 A. One year after.</p> <p>17 Q. Okay. And how long did you --</p> <p>18 A. Right after high school, you mean?</p> <p>19 Q. Right after high school. Thank you.</p> <p>20 Then what did you do that year after</p> <p>21 high school?</p> <p>22 A. That -- the one year between --</p> <p>23 Q. Before --</p> <p>24 A. -- high school?</p> <p>25 Q. Correct. Before going to Berkeley.</p>	24
21	<p>1 A. Studied music, spent time in libraries.</p> <p>2 Q. Okay. And then were you accepted into</p> <p>3 Berkeley as an undergraduate student?</p> <p>4 A. No. I audited classes.</p> <p>5 Q. And how long did you audit classes</p> <p>6 there?</p> <p>7 A. Two and a half years.</p> <p>8 Q. Did you ever take -- earn a degree from</p> <p>9 Berkeley?</p> <p>10 A. No.</p> <p>11 Q. Okay.</p> <p>12 A. I had an opportunity to work with a man</p> <p>13 named Frederick Scarf. So I came back down to L.A.</p> <p>14 and I worked with him.</p> <p>15 Frederick was a plasma physicist. He</p> <p>16 dealt with something called bowshock, which has to</p> <p>17 do with how gases and temperatures work in outer</p> <p>18 space.</p> <p>19 Q. Did you work -- how long did you work</p> <p>20 with this man?</p> <p>21 A. Two years.</p> <p>22 Q. Okay. And what was your -- what were</p> <p>23 your duties working with this man?</p> <p>24 A. Honestly, errand boy. I dated his</p> <p>25 daughter, but I would -- literally it was him</p>	24
21	<p>1 teaching me. It was him going through this is what</p> <p>2 we do, this is how things work.</p> <p>3 He was the head of the U.S. space</p> <p>4 program for TRW at the time.</p> <p>5 Q. And why did you stop working for him</p> <p>6 after two years?</p> <p>7 A. His daughter and I broke up.</p> <p>8 Q. So, you left Berkeley after two and a</p> <p>9 half years.</p> <p>10 And when -- when did you graduate high</p> <p>11 school? What year?</p> <p>12 A. '70 -- 77, I think.</p> <p>13 Q. Okay. So, approximately 1979 you go to</p> <p>14 Berkeley for a couple years, correct?</p> <p>15 A. Yeah.</p> <p>16 Q. Then you go around 1981 or '2 to -- what</p> <p>17 was the gentleman's name you worked for?</p> <p>18 A. Frederick Scarf.</p> <p>19 Q. You worked for Mr. Scarf for a couple</p> <p>20 years?</p> <p>21 A. Yeah. I was doing other things.</p> <p>22 Q. Did you ever go back to college?</p> <p>23 A. Yes. I think I did. But nothing</p> <p>24 serious.</p> <p>25 At this point in my life I decided that</p>	24

25	<p>1 I was going to be an autodidactic.</p> <p>2 Q. Did you ever earn a degree from college?</p> <p>3 A. No.</p> <p>4 Q. Did you ever earn a degree from any type</p> <p>5 of trade school?</p> <p>6 A. No.</p> <p>7 Q. Other than high school -- well, did you</p> <p>8 earn a degree in high school -- let me rephrase.</p> <p>9 Because it's a diploma in high school.</p> <p>10 Did you graduate high school and receive</p> <p>11 your diploma?</p> <p>12 A. I think I did.</p> <p>13 Q. You're not sure?</p> <p>14 A. No. I took a head blow, so I've got</p> <p>15 fuzziness in certain periods of my life. This is a</p> <p>16 head blow (indicating), just so you know.</p> <p>17 Q. When did you take this head blow?</p> <p>18 A. 1983.</p> <p>19 Q. And is this a medical problem you've had</p> <p>20 since 1983?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Can you tell us the head blow,</p> <p>23 what happened to you?</p> <p>24 A. I was hit in the head with a sharp</p> <p>25 object.</p>	27	<p>1 A. Yeah.</p> <p>2 Q. Okay. Does that impact --</p> <p>3 A. Well --</p> <p>4 Q. Go ahead.</p> <p>5 A. Recently I was given a prescription.</p> <p>6 Dr. Greaves is my lawyer -- or my physician,</p> <p>7 G-r-e-a-v-e-s.</p> <p>8 After I had a diver- -- I have</p> <p>9 diverticulosis. So I did have an attack of</p> <p>10 diverticulitis, which is the active part of it. He</p> <p>11 gave me antibiotics, a ten-day run. This was on</p> <p>12 July 31st.</p> <p>13 Q. Does any of this affect your memory?</p> <p>14 A. No.</p> <p>15 Q. So your memory's clear?</p> <p>16 A. Yeah.</p> <p>17 Q. And it has been for at least a decade?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. So you've never earned a college</p> <p>20 degree, correct?</p> <p>21 A. Uh-huh.</p> <p>22 Q. You never earned a master's degree,</p> <p>23 correct? Never --</p> <p>24 Is that correct?</p> <p>25 A. Yeah.</p>
26	<p>1 Q. Okay. Did you go to the hospital?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. What was the diagnosis by the</p> <p>4 hospital or doctors?</p> <p>5 A. Concussion. I don't remember anything</p> <p>6 more.</p> <p>7 Q. What are the symptoms of this -- let me</p> <p>8 rephrase.</p> <p>9 Is this an ongoing ailment you now have</p> <p>10 due to the head blow?</p> <p>11 A. No. But it was during the period. The</p> <p>12 after-effects, I don't have any grand mal seizures,</p> <p>13 I'm not on Dilantin. But what it does do is looking</p> <p>14 back upon events that preceded the blow to the head,</p> <p>15 it's patchy.</p> <p>16 Q. What about events that were subsequent</p> <p>17 to the blow to the head? Are those patchy, as well?</p> <p>18 A. No.</p> <p>19 Q. Okay. Are those clear to you?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. Do you take medication regularly?</p> <p>22 A. Do I take medication?</p> <p>23 Q. Correct. As of now regularly.</p> <p>24 A. Amlodipine.</p> <p>25 Q. Is that all?</p>	28	<p>1 Q. You've never earned a Ph.D.; is that</p> <p>2 correct?</p> <p>3 A. Yeah.</p> <p>4 Q. And you're not sure if you earned your</p> <p>5 high school diploma?</p> <p>6 A. What I said was I'm pretty sure I did.</p> <p>7 Q. Okay. You're sure you did is not the</p> <p>8 same as you know you did.</p> <p>9 So, did you or did you not?</p> <p>10 A. To be honest with you, I believe that I</p> <p>11 did. I'm not 100 percent sure because the event of</p> <p>12 1983 has caused a patchwork quilt of memories.</p> <p>13 Q. Have you ever gone by a name other than</p> <p>14 Thomas Schoenberger?</p> <p>15 A. Thomas Schoenberger and then</p> <p>16 occasionally Thomas St. Germaine, which is going to</p> <p>17 be my stage name. So, other than that, no.</p> <p>18 Q. When did you stop using Thomas</p> <p>19 St. Germaine?</p> <p>20 A. I haven't used it yet. It's, you</p> <p>21 know --</p> <p>22 Q. And the name prior to that, Thomas</p> <p>23 Schoenberger, when did you start using that?</p> <p>24 A. Thomas Schoenberger is what I tease</p> <p>25 myself about in high school, in the six months</p>

29

1 **during high school, maybe three.**
 2 Q. Okay. So they're not -- are they names
 3 that you've used when you're filling out
 4 applications?
 5 A. No.
 6 Q. Have you ever used them introducing
 7 yourself to people?
 8 A. No.
 9 Q. So are these names that you just have in
 10 your mind that you might call yourself from time to
 11 time?
 12 A. No. This -- people have stage likes
 13 names. Michael Levine is thinking of going by Vine.
 14 But for everything that I've put on the
 15 internet under my YouTube station or in my Facebook
 16 pages -- which I don't use these social media
 17 anymore -- I've always used my name, too.
 18 I have only -- the only "nom de plume"
 19 that I've used, which is more for an entity, is
 20 something called Cicada.
 21 Q. Why did you stop using your social
 22 media?
 23 A. It was hacked.
 24 Q. Okay.
 25 A. I was hacked in the worst way, hacked --

30

1 **we found a program. It's remote access to it called**
 2 **a RAT. Someone had got in, it was a Parisian**
 3 **hacker. They went in, they went in through my**
 4 **emails. They went in to create new emails. They**
 5 **went in through Linda's computer.**
 6 Q. Do you have any evidence of this hack?
 7 A. Well, yeah. I think when you depose
 8 Linda, she can talk to you and will hopefully give
 9 you access Apple. We were on the phone with them
 10 for hours.
 11 Q. This is Linda Barrett?
 12 A. Yes. Apple keeps very good records. So
 13 they cannot only authenticate that there was a hack,
 14 but they can authenticate that there was malware all
 15 over the computer.
 16 Q. Just briefly for now what is your
 17 relationship to Linda Barrett?
 18 A. She's my dear friend.
 19 Q. Okay. When did you first meet Linda
 20 Barrett?
 21 A. 2012.
 22 Q. Okay. The blow to the head, what caused
 23 the blow to the head?
 24 A. Someone hit me.
 25 Q. Okay. What were you hit with?

31

1 A. A piece of wood.
 2 Q. And who hit you?
 3 A. Someone who was attacking a woman.
 4 Q. Do you know the person that hit you?
 5 A. I have no idea.
 6 Q. Okay. Were you ever in the military?
 7 A. What do you mean by military? As in
 8 professional soldier?
 9 Q. Let me rephrase the question.
 10 Did you ever serve in the military?
 11 A. As a professional soldier?
 12 Q. Well, I'm going to let you tell us how
 13 you think you served in the military, if you served
 14 in the military in any capacity.
 15 A. I think it's a broad question.
 16 I think that if you say did I -- did I
 17 serve in any fashion for The Pentagon? Is that what
 18 you're asking?
 19 Q. So, do you understand what the military
 20 is?
 21 A. Yes.
 22 Q. Okay. Have you ever served in the Army?
 23 A. No.
 24 Q. Have you ever served in the Air Force?
 25 A. No. Or the Navy.

32

1 Q. Never served in the Navy, correct?
 2 A. No.
 3 Q. And you've never served in the Marines?
 4 A. No.
 5 Q. Okay. Is there any branch of the
 6 military in which you have served?
 7 A. The military is presided over by The
 8 Pentagon.
 9 I want to make it very clear what you're
 10 asking. I'm wondering if you can rephrase the
 11 question.
 12 Q. Did you -- let's ask about The Pentagon.
 13 Did you work at any time as an employee
 14 in The Pentagon?
 15 MR. PARMELEE: Objection.
 16 THE WITNESS: Not as --
 17 MR. PARMELEE: Vague as to "employee."
 18 You can answer the question.
 19 BY MR. WITTENBERG:
 20 Q. What was your relationship with The
 21 Pentagon, if any?
 22 A. I was charged with putting together a
 23 program that was going to be the basis for
 24 clandestine activities near the border of Iran.
 25 Q. Okay. When did this charge first occur?

33

1 **A. Early 2011.**
 2 Q. And did you have written correspondence
 3 with The Pentagon about this?
 4 **A. Yes.**
 5 Q. Do you have that written correspondence
 6 in your possession, custody or control?
 7 **A. No. I have only one thing that I have**
 8 **given to Mr. Parmelee.**
 9 Q. And what is that?
 10 MR. PARMELEE: It's in your control --
 11 you're not talking -- well, objection as to the
 12 communication to me.
 13 But the document itself he can speak to
 14 because --
 15 MR. WITTENBERG: He gave you the
 16 document --
 17 MR. PARMELEE: -- you're asking about
 18 the document, not what he actually gave to me.
 19 BY MR. WITTENBERG:
 20 Q. So what is the document you gave to your
 21 attorney?
 22 **A. The document explains how myself and**
 23 **another individual were going to go meet with the**
 24 **Governor of the province of a place near the border**
 25 **of Iran with an idea of doing a concert.**

34

1 **But it's more complicated than that.**
 2 **There were 17 nations involved.**
 3 **So if you ask me if I was a professional**
 4 **soldier, Mr. Wittenberg, no. If you ask me if I was**
 5 **involved in operations that had to do with national**
 6 **security, the answer is yes.**
 7 **Furthermore, I will also reveal to you**
 8 **that I didn't get paid and I wasn't looking to get**
 9 **paid.**
 10 Q. Did you ever go to -- on this mission --
 11 this clandestine mission you're describing?
 12 **A. I aborted the mission.**
 13 Q. Okay. And when did you abort the
 14 mission?
 15 **A. June 10, 2011.**
 16 Q. Okay.
 17 **A. 18 days later Taliban hit where we would**
 18 **have been. Six -- two or three with RBG's and then**
 19 **three with grenades.**
 20 Q. And what did you do to abort the
 21 mission?
 22 Let me rephrase.
 23 How did you go about aborting the
 24 mission?
 25 **A. I told my teammates that Tali had -- or**

35

1 **Taliban had found out about us. I was communicating**
 2 **with things -- with people that I knew, and I had**
 3 **figured out that there had been loose lips.**
 4 So, they -- we were going to be
 5 scheduled to stay at the Intercon Hotel in Kabul.
 6 **And that was cancelled.**
 7 And on June 28, 2011, a wedding party
 8 **that had rebooked was blown up by six Taliban.**
 9 Q. What were the names of the team members
 10 you're describing?
 11 **A. I'm not at liberty to divulge that**
 12 **because that's, you know --**
 13 Q. Who is the contact you had at the
 14 Pentagon?
 15 **A. Am I allowed to -- because that's a hard**
 16 **one to do. You know, I think --**
 17 MR. PARMELEE: You are under oath and --
 18 Can we take a quick break? It's up to
 19 you.
 20 THE WITNESS: I'm not trying to be --
 21 MR. WITTENBERG: I don't think we need
 22 to break over this.
 23 BY MR. WITTENBERG:
 24 Q. Either you have a name for me or you
 25 don't.

36

1 Do you -- you're telling a story about a
 2 clandestine mission where you were going to play
 3 music in Afghanistan, but you're not giving a single
 4 name of any person who was involved with you, you
 5 won't tell us or show us the document that you claim
 6 to have.
 7 MR. PARMELEE: The document has been
 8 produced. And you haven't asked him, except for the
 9 one name, for any other names at this point.
 10 It mischaracterizes what's gone on so
 11 far.
 12 THE WITNESS: Mr. Wittenberg, look --
 13 MR. WITTENBERG: You'll have an
 14 opportunity to present evidence any way you want,
 15 and you can go over this with your client later.
 16 I don't have the opportunity to do that
 17 other than now.
 18 BY MR. WITTENBERG:
 19 Q. So this is really relatively
 20 straightforward.
 21 Do you have any contact name at The
 22 Pentagon with whom you were communicating?
 23 **A. The person is no longer at The Pentagon.**
 24 **The person's name is Bijan, B-i-j-a-n, Kian,**
 25 **K-i-a-n.**

37

1 Q. When was the last time you communicated
2 with this individual?
3 **A. 2011.**
4 Q. And did you communicate by telephone or
5 email or both?
6 **A. Telephone.**
7 Q. Did you ever communicate by email?
8 **A. I don't remember.**
9 Q. Other than this clandestine mission
10 you're telling us that you were -- is it correct
11 that you were approached by The Pentagon to go on
12 this clandestine mission you're telling us about?
13 **A. Uh-huh.**
14 Q. Okay. And when did they approach you?
15 Do you recall the date?
16 **A. Early spring in 2011. The --**
17 Q. So, approximately April?
18 **A. Yes. Mr. Wittenberg, here's what I'm**
19 **going to ask you. I am more than happy to give you**
20 **secondary parties of people who are our teammates.**
21 **But if you're going to try to contact**
22 **Mr. Bijan Kian, I think a better approach rather**
23 **than doing that is I had another lawyer at the time**
24 **who has documentation that was -- she was not only a**
25 **witness to what was going on, but she actually**

38

1 **provided legal counsel for a second member of our**
2 **team.**
3 Q. And what is your point? Do you want to
4 give us the name of this attorney?
5 **A. Yes.**
6 Q. Okay. Go ahead.
7 **A. Beverly Saxon Leonard.**
8 Q. And what's her contact information?
9 **A. I don't have her number in front of me.**
10 Q. What firm did she work at?
11 **A. Saxon Leonard Law Firm. I believe it**
12 **could be --**
13 Q. Okay. Did she represent you?
14 **A. Yes. But not for -- not for this.**
15 **But the second team member that she**
16 **talked to was Seval Oz, S-e-v-a-l and then O-z. You**
17 **might know -- her brother is Mehemet Oz, otherwise**
18 **known as Dr. Oz. It's a TV show.**
19 Q. So other than this clandestine operation
20 you were asked to go on in 2011, have you done any
21 other service for the military?
22 **A. Not for the military.**
23 Q. Okay. Have you ever conducted any
24 business outside of the United States?
25 **A. What do you mean "conducted business"?**

39

1 Q. Have you ever gone abroad to perform
2 business services, like a composer?
3 **A. I was attempting to start a business. I**
4 **went into Turkey, and I was attempting to pull**
5 **together former military people who have been**
6 **involved in special ops who would then train Kurdish**
7 **forces in an effort to exterminate and eliminate**
8 **ISIS.**
9 **Because, as Ms. Gauthier can tell you, I**
10 **was concerned that ISIS was metastasizing and would**
11 **end up going into Europe to do soft terrorism and**
12 **then coming into America to do soft terrorism.**
13 Q. And when did you begin this --
14 What would you call this work that
15 you're talking about?
16 Would you call it antiterrorism work
17 that you were doing?
18 **A. Counter-terrorism work. But**
19 **essentially --**
20 Q. Were you doing it for yourself on your
21 own?
22 **A. No. I was attempting to do it as a --**
23 **for humanitarian reasons, but also saying you can't**
24 **just have -- you can't do a 501-C3, you have to have**
25 **a network that will not only pay for weapons and**

40

1 **training, but also I felt that Turkey was doing**
2 **nothing. I was aware that Turkey was supplying ISIS**
3 **with oil. I was looking at --**
4 Q. When did you start this work you're now
5 talking about?
6 **A. 2014.**
7 Q. Approximately what month?
8 **A. January.**
9 Q. So in January 2014 this is an idea you
10 had, correct?
11 **A. Actually even earlier.**
12 Q. Okay.
13 **A. Late 20 -- November 2013.**
14 Q. Okay. And what evidence do you have of
15 any of the work that you were doing on this
16 counter-terrorism project?
17 Do you have any writings?
18 **A. Yeah, I think I have writings on it.**
19 Q. What do you have?
20 **A. Notes.**
21 Q. Your own personal notes that you took?
22 **A. Yeah. I met with -- with Kurdish**
23 **resistance fighters in Turkey.**
24 Q. So you traveled to Turkey in 2014?
25 **A. Yeah.**

41	<p>1 Q. Okay. And when did you travel to Turkey</p> <p>2 in 2014?</p> <p>3 A. September.</p> <p>4 Q. Okay. For how long?</p> <p>5 A. Must have been there for a week.</p> <p>6 Q. Okay. Did you pay for your own</p> <p>7 travel --</p> <p>8 A. Yeah.</p> <p>9 Q. -- to go to Turkey?</p> <p>10 A. Yeah.</p> <p>11 Q. Okay. Outside of this counter-terrorism</p> <p>12 work, did you ever work abroad doing any other kind</p> <p>13 of work?</p> <p>14 A. As of -- recently?</p> <p>15 Q. Have you ever put on a performance</p> <p>16 outside the country?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay. Where?</p> <p>19 A. Years ago.</p> <p>20 Q. Where?</p> <p>21 A. Germany, Vienna.</p> <p>22 Q. When? When was the Germany performance?</p> <p>23 A. '70's, '80's.</p> <p>24 Q. In the 1970's you put on a performance</p> <p>25 in Germany?</p>	43	<p>1 corporate clients and for wedding planners.</p> <p>2 Q. So people would call you if they were</p> <p>3 throwing a party and ask you to provide musical</p> <p>4 entertainment?</p> <p>5 A. Yes. Or mimes, acrobats, ambient</p> <p>6 entertainment.</p> <p>7 Q. How many employees did that company</p> <p>8 have?</p> <p>9 A. We hired independent contractors.</p> <p>10 Q. Okay.</p> <p>11 A. So if you're looking at independent</p> <p>12 contractors, you know, 500 to 1,000.</p> <p>13 Q. But as far as employees of the company</p> <p>14 that made the arrangements, was it just you?</p> <p>15 A. No.</p> <p>16 Q. Okay.</p> <p>17 A. Huh-uh. Three to five, sometimes six.</p> <p>18 Q. So, when is -- were you ever in Iraq?</p> <p>19 A. No.</p> <p>20 Q. Okay. Were you ever in Iran?</p> <p>21 A. No.</p> <p>22 Q. Were you ever in Afghanistan?</p> <p>23 A. No. I planned to be.</p> <p>24 Q. Did you ever work for the U.S.</p> <p>25 Government other than your -- what you've already</p>
42	<p>1 A. Yeah. In the '60's.</p> <p>2 Q. In the 1960's you put on a performance</p> <p>3 in Germany?</p> <p>4 A. I was performing since I was three and a</p> <p>5 half.</p> <p>6 Q. So at three and a half years old you put</p> <p>7 on a performance in Germany; is that right?</p> <p>8 A. No. What I said was I was performing</p> <p>9 since three and a half. Might have been '60's, '68,</p> <p>10 '69, I was playing the organ. I was doing</p> <p>11 performances in the '70's. You know, in the '80's I</p> <p>12 played there.</p> <p>13 Mr. Wittenberg, I've been to Europe 80,</p> <p>14 90 times.</p> <p>15 Q. Okay. Since the '80's have you gone to</p> <p>16 put on a performance?</p> <p>17 A. Since the '80's?</p> <p>18 Q. Yes.</p> <p>19 A. No. In the '90's, from 1992 to 2008</p> <p>20 my -- you cannot even say I was primarily a</p> <p>21 composer, because the work that I did with North Bay</p> <p>22 Entertainment took all my time.</p> <p>23 Q. And what kind of work was that again, if</p> <p>24 you could describe it in a few words?</p> <p>25 A. We would procure entertainment for</p>	44	<p>1 told us about your clandestine mission with The</p> <p>2 Pentagon?</p> <p>3 A. No. The whole point of what I was doing</p> <p>4 with ISIS was going to be brought to the U.S.</p> <p>5 Government saying "This is what I've done." You</p> <p>6 know, I wanted their involvement. But, no.</p> <p>7 Q. Okay. So let me just try to summarize</p> <p>8 this.</p> <p>9 You were never an employee of the U.S.</p> <p>10 Government, an employee being somebody who is paid a</p> <p>11 salary to work, right? As a Pentagon person who</p> <p>12 goes to work there on a daily basis?</p> <p>13 A. Yes.</p> <p>14 Q. You were never employed by the Pentagon;</p> <p>15 is that correct?</p> <p>16 A. To be specific, I was not employed.</p> <p>17 They asked me to volunteer.</p> <p>18 Q. Okay. And that was the only time you</p> <p>19 ever worked with the U.S. Government was the</p> <p>20 clandestine mission in -- regarding, I guess,</p> <p>21 Afghanistan 2011, correct?</p> <p>22 A. Yes. The only time that they've asked</p> <p>23 me to volunteer.</p> <p>24 Q. Okay. Have you ever invented anything?</p> <p>25 A. Yes.</p>

45

1 Q. Okay. What have you invented?
 2 A. Every time you write an original piece
 3 of music, that's an invention. Every time that --
 4 that Mozart wrote a symphony or a piano concerto,
 5 that's an invention.
 6 Are you asking about science or are you
 7 asking --
 8 Q. I'll ask other than composing music,
 9 have you ever invented any -- anything at all?
 10 A. I have invented concepts that I've
 11 wanted to get R and D on -- you know, as Ms.
 12 Gauthier can tell you, this underground drone, I was
 13 in development with it.
 14 Q. Where was this underground drone in
 15 development?
 16 A. Well, I was speaking with a man named
 17 Brian Light. I was asking anybody and everybody and
 18 looking through the internet and going to libraries
 19 to discuss how we can get through a problem that we
 20 had, which is how to get radio frequencies under
 21 100 feet.
 22 I had a conversation with Mr. Hawass,
 23 who was the head of antiquities for Egypt for a
 24 while. I'm sure you've heard of him.
 25 Q. When did you -- did you invent the

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1 underground drone that you're talking about?
 2 A. I invented the concept. There is no
 3 underground drone right now. I'm still trying to
 4 work it out.
 5 But as any inventor -- when a composer
 6 is trying to compose a symphony, he might have a
 7 skeletal structure. When there is an inventor, you
 8 come up with a concept and you try to work out the
 9 bugs. That can take years.
 10 Q. So, was this just an idea that you had?
 11 A. It's one of many, Mr. Wittenberg. I'm
 12 trying to come up with a concept for cloaking
 13 technologies in general.
 14 Q. Did you ever build this underground
 15 drone?
 16 A. I have not built one, because it would
 17 be impossible to build until you are able to attach
 18 to the drone all the technology that you need. The
 19 sensors, you need to know the weight.
 20 Q. Did you ever make an investment in an
 21 underground drone of cash?
 22 A. How can I make an investment in
 23 something that hasn't been invented?
 24 Q. Should I take that as a no?
 25 A. Have I made again an investment in --

47

1 Q. Have you invested money as an investment
 2 in building an underground drone?
 3 A. Have I -- could you rephrase the
 4 question, please?
 5 Q. What about the question did you not
 6 understand?
 7 A. Have I invested money in building an
 8 underground drone?
 9 I don't understand that.
 10 Are you asking me have I invested money
 11 in the development of the concept? And I can say
 12 absolutely yes.
 13 Q. Okay. How much did you invest in the
 14 development of the concept?
 15 A. I don't have that figure in front of me.
 16 I don't know.
 17 Q. Okay. Where did you invest that money?
 18 And let me rephrase.
 19 When you say you invested money in the
 20 concept, describe what you did to invest money.
 21 A. I talked to you about going to Turkey.
 22 Q. Okay.
 23 A. I checked out the subterranean areas
 24 there, figuring that -- I was running into a problem
 25 with the drone, if it had to be at the end of a

48

1 drill bit.
 2 My idea for a drone would be one that
 3 could not only sense out precious metals but could
 4 also sense out potential viruses, spores, et cetera.
 5 Turkey in particular has subterranean
 6 areas. So you can say I killed two birds in one
 7 stone by going to Turkey, by attempting to meet with
 8 the Kurdish rebels and at the same time scope out an
 9 ancient city that happens to have a subterranean
 10 thing.
 11 Mr. Weiner, who you're going -- who
 12 you're giving a deposition, I also met with him and
 13 his business partner. His business partner is, as
 14 Mr. Weiner has told me, has background in
 15 technology. We went over this.
 16 I also met with a man named Brian Light,
 17 who has not gotten back to me. I've tried to reach
 18 him. I only have an old email.
 19 Q. If I can focus you in on the money, to
 20 whom did you give money to invest in building on --
 21 the concept for the underground drone?
 22 A. No -- no monies transferred, no. It's a
 23 concept that -- to put money in, Mr. Wittenberg, you
 24 have to have your plans finalized. You can't say
 25 I've got this concept, how is it going to rate --

49

1 **how can you give a blueprint to research and**
 2 **development and say let's do this?**
 3 Q. Isn't it correct that you've never
 4 invented any product for sale in commerce?
 5 **A. No.**
 6 Q. Okay. What product have you invented
 7 for sale in commerce?
 8 **A. Music.**
 9 Q. Okay. Other than music, have you
 10 developed any product that you've told in commerce?
 11 **A. No.**
 12 Q. Okay. Other than music, have you
 13 developed any technology?
 14 **A. The underground drone.**
 15 Q. Has that been developed, the underground
 16 drone, or is it just an idea in your head?
 17 **A. I have developed it. It's not ready for**
 18 **R and D, but absolutely.**
 19 Q. So it's just writings on paper?
 20 **A. That would be your description of it;**
 21 **not mine, Mr. Wittenberg.**
 22 Q. I'm asking what your description is.
 23 **A. My --**
 24 Q. Is there a physical drone that you've
 25 developed?

50

1 **A. No.**
 2 Q. Okay.
 3 **A. But if I can refer you to the Codexes of**
 4 **DaVinci, would you consider them writings on paper?**
 5 Q. Okay. Let me turn to your -- I believe
 6 there have been, I think, some at least allegations
 7 in the Complaint that you worked with a team of
 8 scientists to replicate the sun.
 9 Have you ever done that?
 10 **A. I did work them. This was a person**
 11 **named Brian Light --**
 12 Q. Okay.
 13 **A. -- who I believe Ms. Gauthier and I met.**
 14 Q. Is Mr. Light a scientist?
 15 **A. He has described himself as a scientist**
 16 **to me. I don't remember. I don't have his contact,**
 17 **but Ms. Gauthier and I met with him and, I believe,**
 18 **his wife.**
 19 Q. So other than Mr. Light, have you met
 20 with anyone regarding the replication of the sun, of
 21 sunlight?
 22 **A. Brian Weiner, I believe.**
 23 **But I want to start out by saying this**
 24 **is not my idea. It never was my idea. This was**
 25 **Brian -- Brian Light, who came up with the idea. He**

51

1 **was a friend of Warren Zide, who I can't seem to**
 2 **find right now. Tried to call him, to no avail.**
 3 **But this was his deal.**
 4 **What I told Brian because he --**
 5 Q. This is Mr. Light, right?
 6 **A. What?**
 7 Q. Mr. Light, Brian Light?
 8 **A. That's right, Mr. Light. And you can**
 9 **find him on a Google search.**
 10 **But let me finish --**
 11 Q. When did you first meet Brian Light?
 12 **A. Summer of 2014. But if I can finish**
 13 **answering --**
 14 Q. Approximately July or August?
 15 **A. I think it would have been August.**
 16 Q. Okay. How did you meet Mr. Light?
 17 **A. Met him through Warren Zide.**
 18 Q. Mr. Zide introduced you personally to
 19 Mr. Light?
 20 **A. Yes.**
 21 Q. Did you meet him personally, Mr. Light?
 22 **A. Yes.**
 23 Q. Did you ever get his phone number and
 24 talk to him over the phone?
 25 **A. Yes, I did. Once or twice.**

52

1 **But, Mr. Wittenberg, I didn't invent it.**
 2 **This was his thing.**
 3 **And just to be really clear, he had**
 4 **talked about this as something to do with the**
 5 **marijuana business, which, you know, I'm not so hot**
 6 **on pot, as they say.**
 7 **What I said is the applications are**
 8 **going to be huge if you can go ahead and you can**
 9 **consider using this in food scarce areas, in areas**
 10 **where -- food scarce areas that are impacted by a**
 11 **lack of sun.**
 12 Q. Okay. So, did you ever work on a
 13 project to replicate sunlight?
 14 **A. No.**
 15 Q. And when is the last time that you
 16 communicated with at all Mr. Light?
 17 **A. August of last year. August 2014.**
 18 Q. Okay.
 19 **A. Maybe September.**
 20 Q. Did you give any money to Mr. Light?
 21 **A. Yeah.**
 22 Q. Okay. For what purpose?
 23 **A. To -- he was selling precious stones.**
 24 **So I gave him money, and he gave a stone to --**
 25 Q. How much money did you give Mr. Light?

53	<p>1 A. Maybe \$1,000, \$1200, something like 2 that. It wasn't a lot. It was a small -- 3 Q. And this was to buy a stone? 4 A. Yeah. 5 Q. And did he give you a receipt? 6 A. Yes. 7 Q. Okay. Do you still have that receipt? 8 A. Ms. Gauthier has it. 9 Q. Okay. Do you have the receipt? 10 A. No. 11 Q. Okay. Was Mr. Light in the business of 12 selling stones, do you know? 13 A. Yes. 14 Q. Okay. Where did he operate -- where did 15 you go to buy the stones from him -- let me 16 rephrase. 17 Where were you, what physical place when 18 you bought this stone from Mr. Light? 19 A. He sent it in the mail. 20 Q. Where were you when you bought this 21 stone from Mr. Light? 22 A. A restaurant with Ms. Gauthier downtown 23 Los Angeles, I believe. 24 Q. Okay. Do you remember the name of the 25 restaurant?</p>	55	<p>1 time in this restaurant; is that correct? 2 A. I bought a stone for -- I don't remember 3 the exact amount. \$1,000, \$1100, \$1200. I'm not 4 sure. He was with me -- 5 Q. You're not sure he was with me? 6 A. No. I'm not sure the amount. 7 Q. Was he with you -- was Mr. Light with 8 you when you bought the stone from him? 9 A. Mr. Light was with me when I gave him a 10 check. 11 And then when he got back to Ohio, I 12 believe it was, he sent -- 13 Q. Okay. Where were you when you gave 14 Mr. Light the check? 15 A. In the restaurant. 16 Q. So he was present with you at the 17 restaurant when you gave him money to buy a stone; 18 is that correct? 19 A. Yes. 20 Q. Okay. And you wrote him a check? 21 A. Yes. 22 Q. And what account did you write that 23 check from? 24 A. The account that I have. 25 Q. And what account is that by title?</p>
54	<p>1 A. No. 2 Q. Do you remember what month it was? 3 A. August. 4 Q. 2014? 5 A. Yes. 6 Q. Was it the beginning or the end of 7 August? 8 A. I don't remember. 9 Q. Did you buy the stone from Mr. Light on 10 the telephone? 11 A. No. Mr. Light said, "I've got these 12 beautiful things." 13 I was interested in developing a 14 relationship with him, because I had assumed that 15 could be very -- you know, his tag was, you know, 16 "sun anywhere." So I was interested in developing a 17 business relationship with him. 18 And I figured Ms. Gauthier would like 19 the stone. He said it was a -- I think it was a 20 ruby. 21 Q. Okay. 22 A. You know, I'm not an expert on gemology. 23 Q. So you bought a stone from him for 24 \$1200. 25 And that was -- he was with you at the</p>	56	<p>1 A. The North Bay Entertainment account. 2 Q. Do you have only one account? 3 A. Yeah. 4 Q. Okay. Have you ever had -- 5 Let's say in the last five years how 6 many bank accounts have you had that you've 7 maintained and had control of? 8 A. I have this one. I have one at -- 9 Q. Let's take one at a time. 10 When you say "this one," what do you 11 mean? 12 A. That I have that are currently 13 maintained? 14 Q. Within the last five years how many 15 accounts did you have that were in your name? 16 A. Okay. Mr. Wittenberg, here's what I 17 heard, that you said how many accounts in the last 18 five years have you had and maintain. 19 Q. Okay. 20 A. So I'm assuming that you mean present 21 tense that are maintained today. 22 Q. Let's start there. 23 A. Okay. I have one account at Wells Fargo 24 that is maintained. All right? There is an account 25 that is in my son's name. It is called a teen</p>

<p style="text-align: right;">57</p> <p>1 account. It has under \$300 in it.</p> <p>2 Q. Okay. Where is that maintained?</p> <p>3 A. At Wells Fargo.</p> <p>4 Q. Do you have control over that account?</p> <p>5 A. Yeah.</p> <p>6 Q. Do you transfer money into that account?</p> <p>7 A. No.</p> <p>8 Q. When was the last time you transferred</p> <p>9 money into that account?</p> <p>10 A. I do not remember, but last year.</p> <p>11 Q. Okay. When was the last time you</p> <p>12 transferred money out of that account?</p> <p>13 A. Six months ago, maybe four months ago.</p> <p>14 Q. Does anybody have access to that account</p> <p>15 besides you?</p> <p>16 A. No. Well, him.</p> <p>17 Q. "Him" is who?</p> <p>18 A. My son.</p> <p>19 Q. How old is your son?</p> <p>20 A. 15. But he has to have a parent there.</p> <p>21 Q. How much money was the most money that's</p> <p>22 ever been at that account?</p> <p>23 A. I think at one point he had \$50,000 in</p> <p>24 it.</p> <p>25 Q. Okay. Did you put that money in there?</p>	<p style="text-align: right;">59</p> <p>1 that's with Michael Levine; is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. What's the name of the TV show?</p> <p>4 A. We don't have a name, but otherwise it's</p> <p>5 just called 3301.</p> <p>6 Q. So other than that TV show you've done</p> <p>7 no work?</p> <p>8 A. No.</p> <p>9 Q. And --</p> <p>10 A. Well, I've composed.</p> <p>11 Q. Have you worked on any animated films?</p> <p>12 A. As in my YouTubes?</p> <p>13 Q. I'm asking you a question. I don't know</p> <p>14 the answer. So I'll ask it, you answer it.</p> <p>15 Have you ever -- in the last five years</p> <p>16 have you composed any music for animated film?</p> <p>17 A. Well, yes.</p> <p>18 Q. Okay. Which film?</p> <p>19 A. Many of them.</p> <p>20 Q. Can you name them, please?</p> <p>21 A. I can't.</p> <p>22 Q. Can you name one of them?</p> <p>23 A. Disney films from the 1930's. You're</p> <p>24 asking me to describe my YouTube channel, which has</p> <p>25 animation all over the place.</p>
<p style="text-align: right;">58</p> <p>1 A. No.</p> <p>2 Q. Okay. What was the source of that</p> <p>3 \$50,000?</p> <p>4 A. \$50,000 was from his godfather.</p> <p>5 Q. Okay. What's his godfather's name?</p> <p>6 A. Nasha Kazemine.</p> <p>7 Q. Okay. Where does he reside?</p> <p>8 A. He is all over the world.</p> <p>9 Q. Okay. Do you know where he resides?</p> <p>10 A. Minneapolis.</p> <p>11 Q. Do you have his contact information?</p> <p>12 A. No, I don't.</p> <p>13 Q. When was the last time you communicated</p> <p>14 with him?</p> <p>15 A. Last year.</p> <p>16 Q. Okay. Why don't you communicate with</p> <p>17 him anymore?</p> <p>18 A. After I got hacked and after I had to go</p> <p>19 through all this, I've laid low from everybody,</p> <p>20 Mr. Wittenberg.</p> <p>21 I'm right now developing this TV show.</p> <p>22 I have no social media. I have no Facebook. I have</p> <p>23 no presence. Someone violently hacked me in May.</p> <p>24 So I'm laying low until I get a deal.</p> <p>25 Q. And this TV show you're working on,</p>	<p style="text-align: right;">60</p> <p>1 Q. That's not what I'm asking.</p> <p>2 A. Okay.</p> <p>3 Q. I'm going to ask you again, in the last</p> <p>4 five years have you composed music for any film?</p> <p>5 A. Are you -- okay. Here is what -- I want</p> <p>6 to answer your question.</p> <p>7 Are you asking have I composed music for</p> <p>8 a film for money as in work? Or just have I</p> <p>9 composed music for films?</p> <p>10 Q. Why don't you just tell us if you've</p> <p>11 composed any music for films in the last five years.</p> <p>12 A. Okay. Yes.</p> <p>13 Q. Okay. Can you name a film that you've</p> <p>14 composed music for in the last five years?</p> <p>15 A. Animated film?</p> <p>16 Q. Let's broaden it to any film that you</p> <p>17 know the name of that you've composed music for in</p> <p>18 the last five years.</p> <p>19 A. Sure. There was a film called "1984,"</p> <p>20 and I was able to take clips from it and I created a</p> <p>21 song called "Dissonance." It's on my YouTube.</p> <p>22 Q. Did you -- did you compose music for the</p> <p>23 film "1984"?</p> <p>24 A. No.</p> <p>25 Q. Did you get paid for this work on</p>

61

1 "1984"?

2 **A. No.**

3 Q. Can you name another film within the

4 last five years that you composed music for?

5 **A. Can't name the names, but I have 191**

6 **videos on my YouTube station.**

7 **And a lot of this has to do with**

8 **animators. I will grab their work, get permission**

9 **when I can get in touch with them, give them credit**

10 **and then compose new music for it. Yes, there are**

11 **other films. Buster -- Buster Keaton, Charlie**

12 **Chaplin.**

13 Q. When did you do those?

14 **A. 2013.**

15 Q. Were you paid for that work?

16 **A. No.**

17 Q. Okay.

18 MR. WITTENBERG: Well, we've been going

19 an hour. If you want, let's take -- we can take a

20 ten-minute break. Start up at 10:50.

21 (Brief recess.)

22 BY MR. WITTENBERG:

23 Q. Welcome back from the break.

24 **A. Thank you, Mr. Wittenberg.**

25 Q. So, do you understand you're still under

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1 oath?

2 **A. Yes.**

3 Q. Okay. Throughout the day we'll take

4 breaks. But when you come back, it's as if you're

5 still under oath under penalty of perjury and as if

6 we're in court.

7 Okay?

8 **A. Okay.**

9 Q. So we're just going to do some clean-up,

10 what I call, to get through what we went through in

11 the first session.

12 For example, the only work you've done

13 was self-employed composing music and as North Bay

14 Entertainment, correct?

15 **A. The only work since?**

16 Q. 1992.

17 **A. I also manufactured CD's. And I did**

18 **that in conjunction with a man named Robert Miller.**

19 Q. Okay. When did you do that?

20 **A. 2000, 2001, 2002.**

21 Q. Okay. You manufactured CD's?

22 **A. Yes.**

23 Q. Okay. Did you own the business of

24 manufacturing CD's?

25 **A. Well, we were able to get licensing**

63

1 **deals. So we manufactured the CD's, but the**

2 **distribution was done through, you know, Target,**

3 **Walmart, that kind of thing.**

4 Q. Okay. Was it a business that you had

5 created with this partner of yours?

6 **A. Yes.**

7 Q. How was the business formed?

8 **A. The business was formed as an L.L.C.**

9 **The name was Intelibaby, with one L,**

10 **I-n-t-e-l-i-b-a-b-y.**

11 Q. Okay. So were you the only two owners

12 of this L.L.C.?

13 **A. Yes.**

14 Q. Did you form the L.L.C. or your partner

15 or both of you together?

16 **A. Partner formed it.**

17 Q. Okay. And what year was that?

18 **A. 2000.**

19 Q. Okay.

20 **A. Perhaps. You know --**

21 Q. So you did that at the same time you

22 were doing the North Bay Entertainment?

23 **A. Yes.**

24 Q. Okay. Now, in 2008 you said you stopped

25 North Bay Entertainment, right?

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1 **A. Yes.**

2 Q. Is that because you sold the company?

3 **A. On February 19, 2008 my son fell. And**

4 **what we found is that he had a bone tumor.**

5 **So during the time that I was in the**

6 **hospital looking after him, my general manager, who**

7 **was in cahoots with a D.J. who worked as an**

8 **independent contractor, they stole the company, the**

9 **two people whose names I gave you earlier, Steve**

10 **Leflar and Eric Symons.**

11 Q. So they stole the company?

12 **A. Yes.**

13 Q. And kicked you out? Is that what

14 happened?

15 **A. No. They registered the company as**

16 **North Bay Entertainment Concord. And if you look at**

17 **the business office in Concord, you can look through**

18 **the City files, it was filed on March 24th, 2008.**

19 **So that would have been a month after my son's**

20 **hospitalization.**

21 **They did not tell me. They lied through**

22 **their teeth. I finally decided "You want this**

23 **company, you have it."**

24 **I walked away from the business. And**

25 **then I found myself the victim of three websites**

65

1 filled with all sorts of lies and character
 2 assassinations.
 3 Q. So you just walked away from the
 4 business, period?
 5 A. I had a son who the doctor's diagnosis
 6 was that he would be in a wheelchair for a year,
 7 Mr. Wittenberg. After that year he would be in a
 8 walker for another six months and a cane for another
 9 three.
 10 Q. So -- and I'm sorry to hear about your
 11 son.
 12 A. Thank you.
 13 Q. But back to North Bay Entertainment, you
 14 never sold that business, then --
 15 A. No.
 16 Q. -- correct?
 17 And other than your work as a composer,
 18 North Bay Entertainment and this CD company, that's
 19 the only work you've done since 1992; is that
 20 correct?
 21 A. No. I'm developing a language through
 22 music. So this goes into encryption.
 23 There's -- do you know what digital
 24 steganography is? Steganography, s-t-e-g-a-n and
 25 then o-g-r-a-p-h-y.

66

1 It's where you can take a look at a
 2 painting, and within the painting there is a code.
 3 There is a hidden message.
 4 So I've worked very specifically in
 5 trying to develop encryptions that would guarantee
 6 privacy.
 7 Q. Okay. Were you paid for that work?
 8 A. No.
 9 Q. Did you work for a company doing that
 10 work?
 11 A. No. I did it on my own. The -- the
 12 intent of this is to develop a company that will be
 13 able to recloak us so we have privacy.
 14 Q. Okay. So you said you've had no income
 15 since 2011; is that correct?
 16 A. That's true.
 17 Q. And how have you been paying living
 18 expenses since that time?
 19 A. I've had to sell assets.
 20 Q. Okay. What assets?
 21 A. I've had archeological objects, I've had
 22 art.
 23 Q. Paintings?
 24 A. Yeah.
 25 Q. What else besides paintings?

67

1 A. As I said, archeological objects,
 2 Sumerian, Egyptian.
 3 Q. Other than selling art, how have you
 4 been paying your living expenses since 2011?
 5 A. Well, I had a fair -- a fair amount of
 6 an art collection. So, you know, there were assets
 7 that were being sold that were, you know, worth tens
 8 of thousands of dollars.
 9 Q. Okay. So, how much in total did you
 10 sell the art collection?
 11 A. I don't have the figure off the top of
 12 my head.
 13 Q. Okay. A hundred thousand dollars?
 14 A. Probably more.
 15 Q. And you've been living off of that for
 16 four years?
 17 A. Yeah.
 18 Q. Have you been living off of any other
 19 money in the last four years than the sale of your
 20 art collection?
 21 A. No.
 22 Q. Okay. We've covered most of your
 23 background.
 24 I just want to cover your family
 25 situation.

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1 Let's start with your son. Was he born
 2 in -- was it 1960?
 3 A. Yeah.
 4 Q. What are the names of your parents?
 5 A. My father was T.L. Schoenberger. He's
 6 deceased.
 7 Q. Okay. When did he pass away?
 8 A. November 10, 2010.
 9 Q. And your mother?
 10 A. Elizabeth Schoenberger. She's 88.
 11 Q. Where does she reside?
 12 A. She's in Napa.
 13 Q. Do you know her telephone number?
 14 A. Not off the top of my head.
 15 Q. Do you call her?
 16 A. Not a whole bunch.
 17 Q. Do you guys have a good relationship?
 18 A. I had a fall-out with my brother, and it
 19 caused a schism in the family.
 20 My brother is a Ph.D. My brother wanted
 21 my father to undergo three surgeries at the age of
 22 87, and I didn't want that. And he won that
 23 decision. And my -- my father died.
 24 Q. Okay. So when is the last time you
 25 talked with your mother?

69

1 MR. PARMELEE: Objection. Relevance to
 2 the whole line of questioning about his father,
 3 mother and brother.
 4 You can answer the question.
 5 THE WITNESS: A couple months.
 6 BY MR. WITTENBERG:
 7 Q. Okay.
 8 A. **We're in touch, but, you know, she's**
 9 **pretty old.**
 10 Q. Do you have her email address? Does she
 11 email?
 12 A. **She doesn't email.**
 13 Q. And what is her address?
 14 A. **I don't know that off the top of my head**
 15 **either. I tried to blank out everything that had to**
 16 **do with Napa.**
 17 **This is where the stalking occurred.**
 18 **This is where my son was serially stalked. So was**
 19 **I.**
 20 Q. Did you ever do the stalking?
 21 A. **No.**
 22 Q. You've never been accused of stalking?
 23 A. **Have I been accused? Yes.**
 24 Q. Okay. So let's focus, though, before we
 25 get there on your mother.

70

1 Does she live in a house now?
 2 A. **Yes.**
 3 Q. And she lived in Napa; is that correct?
 4 A. **Yes.**
 5 Q. And do you know the street name she
 6 lives on?
 7 A. **Old Sonoma Highway.**
 8 Q. Okay. Do you know the approximate
 9 cross-street?
 10 A. **Imola, I-m-o-l-a.**
 11 Q. Now, you mentioned you have a brother,
 12 correct?
 13 A. **Yes.**
 14 Q. What's his name?
 15 A. **Stephen.**
 16 Q. Stephen what?
 17 A. **Schoenberger.**
 18 Q. And how old is he?
 19 A. **22 months younger than me. So, 1961.**
 20 Q. Okay. And when was the last time you
 21 talked to him?
 22 A. **Around the time that my dad died.**
 23 Q. When was that?
 24 A. **Five years ago.**
 25 Q. And where does your brother Stephen

71

1 reside?
 2 A. **San Diego.**
 3 Q. Okay.
 4 A. **I've never been to his house.**
 5 Q. Okay. Other than your brother Stephen,
 6 do you have any other siblings?
 7 A. **I had.**
 8 Q. Okay.
 9 A. **I had a sister who died.**
 10 Q. Okay. What was her name?
 11 A. **Karen.**
 12 Q. When did she pass away?
 13 A. **2002.**
 14 Q. Okay. Other than Karen and Stephen?
 15 A. **(No audible response.)**
 16 Q. No?
 17 Were you ever married?
 18 A. **Yes.**
 19 Q. And who was your wife? What was her
 20 name?
 21 A. **Lori N. Duperon, D-u-p-e-r-o-n.**
 22 Q. When did you marry her?
 23 A. **1988.**
 24 Q. And how long were you married?
 25 A. **Two and a half years. She's an**

72

1 **attorney.**
 2 Q. Okay. And where did you reside -- did
 3 you live with her when you were married?
 4 A. **Yes.**
 5 Q. Okay. Where did the two of you reside?
 6 A. **We lived in Hollywood.**
 7 Q. Where?
 8 A. **62 and a half Delongpre, Hollywood,**
 9 **90036 -- 28.**
 10 Q. So after roughly two years of marriage
 11 you divorced?
 12 A. **Uh-huh.**
 13 Q. And I'll refer to her as your ex-wife.
 14 Do you only have one ex-wife?
 15 A. **No. I have two.**
 16 Q. So after the first marriage ended -- was
 17 it Lori?
 18 A. **Yes.**
 19 Q. Does she still live in L.A.?
 20 A. **She lives in Newport Beach now.**
 21 Q. And do you know what name she goes by
 22 now?
 23 A. **Lori Savit, S-a-v-i-t.**
 24 Q. Do you communicate with her?
 25 A. **Yeah. We're good friends.**

73

1 Q. Do you have children with her?
 2 A. No.
 3 Q. Do you have a contact information?
 4 A. (310) 245-3497.
 5 Q. Okay. And after Lori, you divorced her,
 6 when did you next get married?
 7 A. I think it was 1997.
 8 Q. Okay. And what was the name of your
 9 wife?
 10 A. Fara, F-a-r-a. She goes by Fara --
 11 she's Persian, so it would be Farnak,
 12 F-a-r-a-n-a-k.
 13 Q. Her first name is Farnak?
 14 A. Yes.
 15 Q. And what's her last name?
 16 A. Shahroozi.
 17 Q. Do you know how to spell that?
 18 A. Yeah. S-h-a-h-r-o-o-z-i.
 19 Q. And so you married in 1997, correct?
 20 A. Yeah.
 21 Q. And how long were you married to her
 22 for?
 23 A. Till 2009.
 24 Q. Okay. And you divorced in 2009; is that
 25 correct?

74

1 A. Yeah.
 2 Q. Where did you reside with this second --
 3 I'll call her the second wife?
 4 A. On Fern Drive. You have the license.
 5 Q. Okay.
 6 A. That was the address.
 7 Q. Do you communicate with your second
 8 wife?
 9 A. Sure. I communicate with both my
 10 ex-wives. They're my friends.
 11 Q. Is your second ex-wife the mother of
 12 your child?
 13 A. Yes.
 14 Q. How many children did you have with her?
 15 A. One.
 16 Q. What is your child's name?
 17 A. Wolfgang.
 18 Q. That is his first name?
 19 A. Michael Wolfgang, but he goes by
 20 Wolfgang.
 21 Q. What is his legal name?
 22 A. Michael Wolfgang Schoenberger.
 23 Q. Thank you.
 24 And how old is he now?
 25 A. 15.

75

1 Q. Does your second ex-wife still have
 2 custody with you of your child?
 3 A. Yes.
 4 Q. And when is the last time you saw your
 5 second ex-wife?
 6 A. Last month.
 7 Q. Did you see her here in L.A.?
 8 A. No.
 9 Q. Does she live here in L.A. still?
 10 A. No. She never lived in L.A.
 11 Q. Do you know where she resides now?
 12 A. Yes. Los Gatos.
 13 Q. Okay. Do you know the street address?
 14 A. 216 -- I can't remember the actual name
 15 of the street, but it's Los Gatos.
 16 Q. Okay. I may have asked, but did you
 17 give us her telephone number already?
 18 A. No.
 19 Q. Do you have it?
 20 A. Do you plan to call her, Mr. Wittenberg?
 21 Q. If the need arises.
 22 A. Okay. I just want it on the record this
 23 is my family and this is a minor -- a minor who has
 24 been stalked. And Mr. Parmelee is a witness to it.
 25 The phone number is (408) -- give me a

76

1 second, because I have it on speed dial -- 685-8383.
 2 Q. That is the number for your second
 3 ex-wife, correct?
 4 A. Yes.
 5 Q. What do you mean Mr. Parmelee is a
 6 witness to stalking?
 7 When did he witness stalking?
 8 A. Mr. Symons, who was Steve Leflar's
 9 partner, was so intent upon also calling my son and
 10 also emailing me that at one point I had a meeting
 11 with Mr. Parmelee and Mr. Friedman. And that
 12 meeting was on December 5th, 2014.
 13 During that meeting Eric Symons sent an
 14 email once again to me after I had written a cease
 15 and desist. And then when I got back home, because
 16 I lived 250 miles away, I found it. I forwarded it
 17 to Jay. And Eric Symons's excuse is "Oh, that's a
 18 joke."
 19 Q. So you're talking about an email you
 20 received when you were in a meeting with your
 21 attorney; is that right?
 22 A. It was from a man who had been
 23 contacting my son on his cell phone since the age of
 24 ten.
 25 Q. And this is the man you blame for

77

1 stealing your business in 2008, right?

2 **A. This is the co-conspirator.**

3 Q. And you're saying your attorney

4 witnessed the email come in to your email box?

5 **A. My attorney witnessed the forward that I**

6 **sent to him when I got back.**

7 **And then my attorney contacted Eric**

8 **Symons and said, "Did you send this?"**

9 **And Mr. Symons not only admitted it,**

10 **then he said it was a joke. He also said that he**

11 **called my son up as a joke.**

12 Q. What number did you -- how did -- did

13 you give the number for Mr. Symons to your attorney?

14 **A. Yes.**

15 MR. PARMELEE: Objection as to

16 attorney-client communications.

17 But go ahead and answer.

18 MR. WITTENBERG: Your client's already

19 revealed that.

20 MR. PARMELEE: I'm -- I should note

21 it --

22 MR. WITTENBERG: As they say it's --

23 BY MR. WITTENBERG:

24 Q. What is the number to Mr. Symons's

25 telephone number?

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1 **A. I don't have his number. But they do.**

2 Q. You gave to it your attorney, right?

3 **A. Yeah.**

4 Q. How did you find his number to give to

5 your attorney, Mr. Symons's number to give to your

6 attorney?

7 **A. Because in the email Eric Symons had**

8 **included his contact information.**

9 Q. After your second wife did you ever get

10 married again?

11 **A. No.**

12 Q. Have you had a girlfriend since your

13 second wife?

14 **A. Yeah.**

15 Q. Okay. I don't want to get into all of

16 that.

17 Do you have a girlfriend now?

18 **A. I don't know if I can call Linda a**

19 **girlfriend. We're best friends. I'm not intimate**

20 **with her. And I'm not intimate with others.**

21 Q. And you mean Linda Barrett; is that

22 correct?

23 **A. Yeah.**

24 Q. And are you -- do you have any other

25 partners besides Linda Barrett?

79

1 **A. Partners as in --**

2 Q. You said you don't know if you can call

3 her a girlfriend. So I'm asking is she a partner of

4 yours?

5 **A. Are you asking partner as in business**

6 **partner or sexual partner?**

7 Q. I'm trying to be politically correct.

8 If she's not your girl -- what would you

9 call her?

10 You said best friends?

11 **A. Yeah.**

12 Q. Do you live with her?

13 **A. Yes.**

14 Q. And how long have you lived with her?

15 **A. Since 2013. But to answer your**

16 **question, Mr. Wittenberg, I'll make it easy here, we**

17 **have separate bedrooms.**

18 Q. Were you ever intimate with Ms. -- with

19 Linda Barrett?

20 **A. Yes.**

21 Q. When were you intimate with Ms. Barrett?

22 **A. 2012, 2013 up until around -- I don't**

23 **know -- early 2014.**

24 Q. But you continued to live with

25 Ms. Barrett the entire time from 2013 through today?

80

1 **A. Yeah.**

2 Q. Okay. And at no time since 2013 have

3 you ever lived here in L.A.; is that right?

4 **A. Could you please, Mr. Wittenberg, define**

5 **live?**

6 **Because if you're there for a week, do**

7 **you live in L.A.? I mean that's what I'm trying to**

8 **ask.**

9 Q. Do you think you live in L.A. if you're

10 here for a week?

11 **A. No. But if I live for a month, does**

12 **that make me living in L.A.?**

13 Q. Do you think it does?

14 **A. I think one can make the argument.**

15 Q. Okay.

16 **A. It's semantic.**

17 Q. Okay.

18 **A. But, you know, I --**

19 Q. Have you ever been in L.A. for a month's

20 time in the last two years?

21 **A. Yeah.**

22 Q. Okay. Where did you stay?

23 **A. Various hotels.**

24 Q. Can you name one?

25 **A. Warner Center Marriott.**

<p style="text-align: right;">81</p> <p>1 Q. Where is that located? 2 A. Oxnard and Topanga Canyon. 3 Q. Can you name another? 4 A. The other Marriott which is there; the 5 Hyatt, which is on Canoga, various -- 6 Q. Did you stay at each of these hotels for 7 a month? 8 A. No. But what I'm saying is the combined 9 one -- if you stay in a hotel -- in one particular 10 hotel for a month, you cannot get the deals that the 11 online companies offer. 12 And also it's a matter of occupancy. A 13 lot of these when they're close to occupancy, you 14 pay what is called rack rate. They have a corporate 15 function, team building, whatnot. 16 Q. Were you traveling at this time? Is 17 that why you stayed in Oxnard and then Topanga and 18 other cities? 19 A. I was in Los Angeles attempting to build 20 a vehicle that could get my music into major motion 21 pictures. I had had success with the YouTube, I had 22 had a large following, and I was growing my brand, 23 as they say. 24 Q. When was this period you were doing this 25 traveling you're now talking about?</p>	<p style="text-align: right;">83</p> <p>1 pre-Constantine. 2 Q. What about other gadgets? 3 I think we touched on this again 4 earlier, but I wasn't entirely clear. 5 So, did you ever make any kind of 6 gadget -- 7 Do you know what a gadget means? 8 A. I do. I do. 9 Q. Okay. A device or a physical mechanical 10 object. 11 Have you ever developed anything like 12 that yourself? 13 A. That's not my -- what I would consider 14 as my "meta," as my strong point. It's a 15 theoretical science. It's up to others to actually 16 create the physical manifestation. 17 Q. Okay. But have you ever studied the 18 physical sciences? 19 A. Yeah. 20 Q. When? 21 A. All my life. 22 Q. Okay. So, just on your own? 23 A. My brother is -- is an immunologist. He 24 neutralizes high affinity human monoclonal DNA 25 specific to proteins. It's T-cells. He's seeking</p>
<p style="text-align: right;">82</p> <p>1 A. June to December 2014. 2 But there was a period of time of three 3 weeks where I was in Europe. 4 Q. And when was that? 5 A. That would have been September 2nd or 6 3rd till the very beginning of October. 7 Q. And where were you in Europe? 8 A. I was in Turkey near the Syrian border. 9 I was in Istanbul there. I was in -- 10 Q. Were you ever in Syria? 11 A. The border's porous. 12 Q. Do you know if you were ever in Syria? 13 A. I don't know. I assume I may have been. 14 I was with Kurds. So I'm not sure. 15 I stayed in the Arab side of Istanbul. 16 Because Istanbul is a bifurcated city where the 17 Europeans are on one side and the Arabs are on 18 another. So I was in the Arabic area. 19 Q. Okay. Is that the period of time -- you 20 mentioned Turkey earlier and a drone. 21 Were you testing a drone there at the 22 time? 23 A. No. There was never a physical drone 24 being built. I was going down into the subterranean 25 areas underneath the city that have been there</p>	<p style="text-align: right;">84</p> <p>1 cancer. 2 For myself, what I'm interested in is 3 inventions that can better people's lives, ideas 4 that can work both in military applications and in 5 archeological applications. 6 The idea for the underground drone was 7 because after speaking with people who were involved 8 in the pursuit of archeology in Egypt, I knew that 9 they could not do anything other than lower 10 high-optical cameras to go seek what's in the 11 pyramids. 12 My idea would be to have something that 13 would be mobile that can move like a scarab beetle. 14 And that was the original genesis of thought. 15 Q. So you've never made any gadgets 16 yourself -- 17 A. No. I -- 18 Q. -- have you? 19 One at a time. 20 You've never made any gadgets yourself; 21 is that correct? 22 A. Yeah. 23 Q. And you've never made any tools -- 24 mechanic tools yourself? 25 A. No. I engage in theoretical and pioneer</p>

85

1 science.

2 Q. Have any of your ideas been made in

3 reality by someone else that you worked with?

4 A. Okay. Here's where it gets interesting.

5 Yes. Anytime that my music was printed out on a

6 piece of paper, that's an invention that's made.

7 Q. Okay. Other than music?

8 A. Well, I'm a composer, sir. And I engage

9 in theoretical science. So, no. I was hoping for

10 that break.

11 Q. Okay. Let's just move to -- I want to

12 talk about some lawsuits you've been involved with.

13 First of all, have you ever been sued

14 before this case?

15 MR. PARMELEE: Objection. Relevance,

16 improper character evidence.

17 You can answer.

18 THE WITNESS: Huh?

19 MR. PARMELEE: You can answer.

20 BY MR. WITTENBERG:

21 Q. You can answer.

22 A. Yeah. I think I was sued by a man named

23 Ron Israel.

24 Q. Okay. And what was that suit about?

25 A. That suit was where he claimed that

86

1 there was non-payment on an event.

2 And if I may, I'd like to talk about

3 this.

4 Ron has later said that he's willing to

5 take back that suit. Ron was a partner of Steve

6 Leflar's. Ron himself had his life savings stolen

7 by Steve Leflar. And he also gave me a piece of

8 paper in which he testified that Steve wrote out the

9 complaint.

10 And on the day that I was to be in

11 court, that's where Steve Leflar called and said

12 "Your son's throat is going to be slit. You have a

13 choice of going to Concord to fight the suit and

14 losing your son or you can stay home and guard him."

15 This is what I was dealing with.

16 And I can get you in touch with

17 Mr. Israel who will qualify this.

18 Q. Now, were you a defendant --

19 A. We talked about that.

20 Q. Were you a defendant in that suit by

21 Mr. Israel?

22 A. Yes.

23 Q. And did that go to trial?

24 A. Small claims.

25 Q. Okay. And you appeared and Mr. Israel

87

1 appeared at a Small Claims Court?

2 A. I -- as I was saying before,

3 Mr. Wittenberg, Steve Leflar called me up and

4 threatened to slit my son's throat --

5 Q. I'm asking now about Ron Israel's case

6 against you.

7 A. This is what I'm talking about. Ron

8 Israel was a current partner with Steve Leflar at

9 the time.

10 Q. Did you and Mr. Israel show up at a

11 Small Claims Court?

12 A. I did not.

13 Q. Did you have to -- was there a judgment

14 in that case?

15 A. Yes.

16 Q. Okay. And what was the judgment?

17 A. Judgment was against me.

18 Q. Okay. For what?

19 A. For \$1,000.

20 Q. And what -- it's correct you have three

21 lawsuits with Mr. Leflar, I think you've listed here

22 in a discovery response?

23 A. Yeah.

24 Q. You were the defendant in each of these

25 cases --

88

1 A. Yeah.

2 Q. -- by Mr. Leflar?

3 Did they all concern North Bay

4 Entertainment?

5 A. Yes. I won all three.

6 Q. In trial you won all three?

7 A. He didn't show up. He was a terrorist.

8 He was a stalker.

9 Q. So if I go to look at these cases,

10 that's what they'll show, that the case was

11 dismissed, each of these cases?

12 A. You can look it up online right now.

13 It's online.

14 Q. Is it correct that all three of the

15 cases Mr. Leflar brought against you were dismissed?

16 A. Yes.

17 Q. And that you were never found liable for

18 anything?

19 A. Exactly.

20 Q. And you never had a judgment against you

21 in any of those cases?

22 A. No.

23 Q. Okay. And then what about the people

24 who Thomas Schoenberger -- I don't know if you'll

25 know them by case number, but M, as "Mary," 0427862?

89

1 MR. PARMELEE: Objection as to
 2 relevance. And that will be continuing.
 3 But you can answer.
 4 BY MR. WITTENBERG:
 5 Q. What was that case about?
 6 **A. Mr. Leflar had posted online -- when I**
 7 **was living with my girlfriend he had posted online**
 8 **"This is where they are. Go terrorize them."**
 9 **He had taken a picture of my**
 10 **girlfriend's license plate, posted it on a website.**
 11 **He was urging people to go do harm.**
 12 **He was at the same time taking thousands**
 13 **and thousands of dollars from clients saying "We're**
 14 **going to procure you a band," and then the band**
 15 **would play and then he wouldn't pay the band.**
 16 **So, in the same courtroom,**
 17 **Mr. Wittenberg -- this is important -- the Concord**
 18 **courtroom, you can look at Steve Leflar,**
 19 **L-e-f-l-a-r, and you can see where he was**
 20 **successfully sued and lost.**
 21 Q. Let me focus you on The People versus
 22 Thomas Schoenberger.
 23 That's -- The People is the Government,
 24 correct?
 25 So you were being prosecuted; is that

90

1 correct?
 2 **A. Yes.**
 3 Q. And why were you being prosecuted by the
 4 Government?
 5 Was it the California State Government?
 6 **A. California -- it was Napa.**
 7 Q. Okay. Why were you being prosecuted by
 8 the Government?
 9 **A. Steve Leflar had issued death -- death**
 10 **threats once again, and I was attempting to get --**
 11 **to wake my girlfriend up to the danger.**
 12 Q. And who was your girlfriend?
 13 **A. A lady named Ms. Ross. That's how I**
 14 **describe her.**
 15 Q. What was her full name?
 16 **A. Julie Ross.**
 17 Q. Okay. Go on.
 18 **A. And because he had stalked us and**
 19 **because she had had a prior extremely -- I really**
 20 **can't say much, but she had had problems that**
 21 **occurred to her in her childhood that caused her, in**
 22 **my opinion -- and I am not a psychiatrist -- mental**
 23 **difficulties.**
 24 Q. So this ex-girlfriend of yours,
 25 Ms. Ross, had mental difficulties? Is that what

91

1 you're saying?
 2 **A. In my opinion she did. She was --**
 3 Q. Okay. Let's focus you in just a little
 4 bit.
 5 You were prosecuted by the State of
 6 California. And you were prosecuted --
 7 Do you remember what the claims were
 8 against you?
 9 **A. Claims were that I was stalking her by**
 10 **calling her on the phone.**
 11 Q. You were stalking Ms. Ross?
 12 **A. Yes.**
 13 Q. Okay. So Ms. Ross reported you to the
 14 police for stalking; is that correct?
 15 **A. She did not -- she -- it was not like**
 16 **that. She had a restraining order. She did a**
 17 **restraining order against me and then called me. I**
 18 **was stupid enough to call her back. So I violated a**
 19 **restraining order.**
 20 Q. Now, all three of these cases that you
 21 listed here of The People versus Thomas
 22 Schoenberger, were they all for the same reason,
 23 because of this ex-girlfriend Ms. Ross?
 24 **A. Yeah.**
 25 Q. Was there any other reason you were

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1 being prosecuted other than the stalking that you
 2 were doing of Ms. Ross?
 3 **A. Her best friend made claims that I had**
 4 **called her, and her best friend filed a restraining**
 5 **order against me.**
 6 **The offices of Friedman law, we filed --**
 7 **or they filed on my behalf a complaint of perjury**
 8 **against --**
 9 Q. Okay.
 10 **A. Against --**
 11 Q. Against who?
 12 **A. Ms. Visa.**
 13 Q. What's her full name?
 14 **A. Lisa Visa.**
 15 Q. And that's Ms. Ross's friend?
 16 **A. Yes.**
 17 Q. And did she allege that you were
 18 stalking her as well?
 19 **A. She alleged that I was calling her.**
 20 Q. So one of these cases, People versus
 21 Thomas Schoenberger, is that you were stalking
 22 Ms. Ross. The second case is that you were stalking
 23 Ms. Visa; is that right?
 24 **A. Second case I was calling Ms. Visa. It**
 25 **was not a stalking.**

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1 Q. Let's start with one.
 2 Was there any judgment against you for
 3 criminal activity?
 4 You were accused of a crime, correct?
 5 MR. PARMELEE: Objection. Vague as to
 6 which -- which one?
 7 BY MR. WITTENBERG:
 8 Q. Okay. Let's start with the -- so I have
 9 three cases here. I'll ask you M042786s in Napa.
 10 Is that Ms. Ross, do you know?
 11 A. Yeah. I think that's Ms. Ross.
 12 Q. Was there a judgment against you in that
 13 case?
 14 A. Yes, there was a judgment against me.
 15 Q. What's the judgment?
 16 A. I took a plea. I think it's stalking.
 17 Q. Okay.
 18 A. It goes down in May to a misdemeanor and
 19 then it's expunged.
 20 But, Mr. Wittenberg --
 21 Q. So it's a felony now?
 22 A. Yeah.
 23 Q. Then the second case, the CR155849,
 24 that's -- is that the Ms. Visa case?
 25 A. It's a Ms. Visa case in which the

94

1 sheriffs did an investigation and found out that I
 2 had never called her and that her friend had called
 3 her. So that's was dropped.
 4 Q. So this case you're saying was dropped?
 5 There was no --
 6 A. I'm not sure of the numbers. But if
 7 we're talking about Ms. Visa, not only did we file a
 8 request for a criminal investigation of her, we had
 9 found that she had -- that her dear friend was
 10 calling on her phone and I was getting arrested for
 11 these things that I did not do.
 12 Q. What about this last case, CR156019?
 13 Who is the third case about?
 14 A. It would have to be Ms. Ross. And this
 15 would have to be what was considered a violation of
 16 probation.
 17 And this is because she was investigated
 18 by the State of California. So they had assumed
 19 that I had reported her to the State of California
 20 for possible infractions or -- or liar loans or --
 21 you're a lawyer that is adept at securities law. I
 22 don't know the -- the terms.
 23 Q. Was there a judgment in that third case?
 24 A. In the third case, yes. They --
 25 Q. What was that judgment?

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1 A. The judgment is that they found me
 2 guilty, they said --
 3 Q. Of what?
 4 A. Of violating my probation my interacting
 5 with a State entity.
 6 Q. Okay.
 7 A. Which would be the Department of Real
 8 Estate. I don't know what the name of it is now.
 9 Q. That was all ongoing in 2014; is that
 10 right?
 11 A. Yes.
 12 Q. Do you know the period of time and
 13 months that that was ongoing?
 14 A. That would have been November, a couple
 15 dates.
 16 Q. Okay. Was it throughout the year of
 17 2014?
 18 Because the case starts and then it goes
 19 until the judgment?
 20 A. Yeah. I wasn't going to -- you know,
 21 Mr. Wittenberg, they accused me of making phone
 22 calls that I didn't do, that --
 23 Q. Well, you pled guilty to a crime so you
 24 are --
 25 A. I didn't plead guilty.

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1 Q. You pled no contest?
 2 A. With the original from five years ago?
 3 Q. The point is that you have a felony on
 4 your record, correct?
 5 A. Yes.
 6 Q. And it's because you were either
 7 found -- and I think you pled guilty to the charges
 8 against you or certain charges, correct?
 9 A. My attorney had advised me that I was
 10 going to be looking at \$100,000 to go through a
 11 court trial, and this was very dangerous. My
 12 attorney had also told me that the Napa criminal
 13 injustice system has some serious issues. This is
 14 from my attorney.
 15 Q. So you believe you are innocent of the
 16 charges?
 17 A. Yeah.
 18 Q. But you pled guilty anyway?
 19 A. I pled nolo conteste, which is not
 20 pleading guilty.
 21 Q. You pled no contest?
 22 A. Yes. At the advice of my attorney.
 23 Q. Well, but you decided to do it.
 24 And you were, therefore, convicted of an
 25 crime, a judgment against you, and it was a felony,

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1 correct?

2 **A. Yeah. No jail time.**

3 Q. Okay. Let me just confirm one other

4 thing, and then we'll move on.

5 Do you recall that we asked for your

6 bank account information in discovery requests in

7 this case?

8 **A. Yeah.**

9 Q. Do you recall that you provided us some

10 bank statements to one account at Wells Fargo?

11 **A. I don't remember what I did. I sent you**

12 **what I had. I was down at the bank with Linda, you**

13 **know. I wasn't feeling very well when you asked**

14 **that from me. I was having a lot of pain because of**

15 **diverticulitis.**

16 Q. Okay.

17 **A. That would have been in June, right?**

18 **Maybe May, June.**

19 Q. Do you have any other bank accounts

20 besides that bank account at Wells Fargo that you

21 produced the statements for in this litigation?

22 **A. I have a teen bank account, which is in**

23 **my son's name.**

24 Q. Okay. Other than that one, do you have

25 any other bank accounts since January 2014?

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1 **A. No.**

2 Q. Okay. So, do you recall when you first

3 became in contact with Plaintiff -- we'll call her

4 Plaintiff throughout, but of course we're referring

5 to Isabelle Gauthier. It's easier if we refer to

6 her as Plaintiff.

7 Do you recall when you first came into

8 contact with Plaintiff?

9 **A. Someone friended me named Sam Moore.**

10 Q. What do you mean by friended you?

11 **A. On Facebook. That's what I recall. A**

12 **guy named Sam Moore.**

13 Q. Okay.

14 **A. And I don't remember when that was.**

15 **That could have been late 2013, mid -- you know,**

16 **autumn, 2013.**

17 **And Sam Moore would like -- you know,**

18 **there's a "like" button for Facebook. Sam Moore**

19 **would like my videos and sometimes say things. And**

20 **I got a sense that, you know, Sam was, you know, a**

21 **thoughtful guy.**

22 **And one day Sam said, "Just to let you**

23 **know, I'm not a guy."**

24 Q. Okay. So --

25 **A. Sam was Isabella.**

99

1 Q. Okay. So it's your testimony that you

2 were using Facebook; is that correct?

3 **A. (No audible response.)**

4 Q. In late 2013.

5 And you were -- I guess someone

6 contacted you on Facebook named Sam Moore; is that

7 right?

8 **A. Yeah.**

9 Q. And you believed that Sam Moore was a

10 man?

11 **A. Yes.**

12 Q. Until how long did you believe Sam Moore

13 was a man?

14 **A. I don't remember. I can guesstimate**

15 **that -- two, three months.**

16 Q. Did you have a picture of yourself up on

17 Facebook page that people could see that you were a

18 man or a woman?

19 **A. Yeah. I had many pictures.**

20 Q. Did Sam Moore have a picture up or an

21 icon to see whether Sam Moore was a man or a woman?

22 **A. Well, no. And later she actually told**

23 **me that was on purpose.**

24 Q. And do you recall your communications

25 with -- and we'll call it Plaintiff on Facebook?

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1 What were they about?

2 **A. In particular, they centered around**

3 **music composition, but also the fact that Government**

4 **was encroaching upon our privacy, that we felt -- a**

5 **group of us felt that the effects of Fukushima had**

6 **been far more serious than what the Government had**

7 **led on.**

8 **So a lot of it had to do with the fact**

9 **that we're tearing our planet to shreds.**

10 Q. Did you review these communications

11 prior to your attending this deposition today?

12 **A. No.**

13 Q. Okay. So how do you remember these

14 communications that happened in late 2013?

15 **A. Because 90 percent of the people on**

16 **social media tend to post pictures of their dogs or**

17 **their drink or I'm having a great time. And it**

18 **was -- what separated Sam and others is a social**

19 **consciousness, which is this is a person who**

20 **obviously cared about Mother Earth. And his --**

21 Q. Let's talk about -- since we now know

22 Sam is Plaintiff, let's use the word Plaintiff so

23 that the record reflects we are talking about the

24 same person.

25 **A. I'm sorry.**

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1 **Okay. And with the Plaintiff, I found**
2 **when the Plaintiff would make comments, they were**
3 **intelligent, they were insightful. They showed**
4 **someone who -- you know, who cared about what was**
5 **going on around us.**
6 Q. Do you recall whether Plaintiff shared
7 anything about a personal life with you?
8 **A. Late 2013 or early 2014 Plaintiff sent a**
9 **picture where she said "I'm actually a girl," and**
10 **Plaintiff had a picture of her at a toga party. And**
11 **I don't know when in 2014 that was. That would have**
12 **been early on.**
13 **But I can't recall much more on it other**
14 **than Plaintiff pointing out saying "I'm this**
15 **person."**
16 **And I think my response was "Wow, you're**
17 **beautiful."**
18 Q. Do you still have access to your
19 Facebook account?
20 **A. No.**
21 Q. When did you stop having access to your
22 Facebook account?
23 **A. May this year.**
24 Q. Prior to May you had access to your
25 Facebook account?

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1 **A. Yes.**
2 Q. So you could have printed those
3 communications you're now referring to; is that
4 right?
5 **A. Well, the thing about it is I gave --**
6 **I think you have those, don't you?**
7 Q. You're asking your attorney whether he
8 has your Facebook communications?
9 **A. Yeah. Because I forwarded everything to**
10 **my attorney, everything I have.**
11 Q. So it's correct that you did print out
12 all your Facebook communications with Plaintiff and
13 gave them to your attorney? Is that your testimony?
14 **A. Yeah. It's -- sometimes you delete**
15 **things, but I don't think that I did with Plaintiff.**
16 Q. Okay. Did you review the documents your
17 attorney produced in this case prior to them
18 coming -- being sent to my office?
19 **A. To tell you the truth, he just said**
20 **"Get -- get me everything that you have and let me**
21 **know what I have."**
22 Q. So you did print the pages for him and
23 communications out of Facebook with Plaintiff and
24 gave them to your attorney?
25 **A. I don't think I printed them. I think I**

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1 **literally copied and pasted. Could I use your**
2 **restroom real quick, Mr. Wittenberg? Is that all**
3 **right?**
4 MR. WITTENBERG: Sure. Why don't we
5 take a short break. Then we'll come back, and then
6 in 30 minutes take a lunch break.
7 (Brief recess.)
8 BY MR. WITTENBERG:
9 Q. Okay. Mr. Schoenberger, so we -- you
10 recall that you first had contact with Plaintiff in
11 around late 2013; is that correct?
12 **A. Late 2013, early 2014, yeah.**
13 Q. How would you describe how your
14 relationship developed with Plaintiff after that
15 first contact?
16 **A. I think it was a feeling she was a**
17 **socially conscious person. I think that -- I had**
18 **put up a series of posts and videos that had to do**
19 **with --**
20 Q. I'm sorry. What kind of videos?
21 **A. YouTube videos.**
22 Q. That you posted on Facebook?
23 **A. Yeah. There had been a group of us who**
24 **had been appalled at --**
25 Q. Well, I just want to stay focused on how

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1 you would describe how your relationship developed
2 with Plaintiff after you first came into contact.
3 **A. Okay. I would describe it as friendly,**
4 **seeing that we had lots of things in common. And it**
5 **was -- once again, there was a feeling that we**
6 **shared a lot of the same interests.**
7 Q. So would you describe your -- you
8 developed a fast friendship or would you describe it
9 as something else?
10 **A. Fraternity I think it would be -- you**
11 **know, a feeling of fraternity with this person.**
12 Q. And what caused you to have that
13 feeling?
14 **A. She was -- Plaintiff was completely**
15 **concerned with what was happening with the Pacific**
16 **Ocean. Plaintiff was equally concerned with what**
17 **was going on with climate change.**
18 Q. Okay.
19 **A. Yeah. Plaintiff was also very**
20 **complimentary of my compositions.**
21 Q. Okay. And that made you feel good, it
22 sounds like, right?
23 **A. Yeah. I --**
24 Q. Were you complimentary of Plaintiff?
25 **A. Yes. Complimentary -- complimentary of**

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1 her empathy.
 2 Q. Okay.
 3 A. Complimentary --
 4 Q. How do you -- can you describe what you
 5 mean?
 6 A. She seemed to care about the planet, she
 7 cared -- she seemed to be a very supportive person.
 8 You know, someone who cared about things that were
 9 bigger than herself.
 10 Q. Okay. So you had a quick connection
 11 with Plaintiff?
 12 A. No. I don't think you can call it a
 13 quick connection, because I assumed that she was
 14 male for a number of months.
 15 Q. Okay.
 16 A. But I believe once we started to engage
 17 in personal communications -- there is private
 18 Facebook and then there is what you post publicly.
 19 Yeah. I certainly felt that she was a kindred
 20 spirit.
 21 Q. And when did that start to happen? Do
 22 you remember?
 23 A. May.
 24 Q. Okay.
 25 A. May or June.

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1 Q. So, about May 2014?
 2 A. May, yeah.
 3 Q. Do you recall, say, telling Plaintiff
 4 that you thought she was very pretty?
 5 A. Yes.
 6 Q. Do you recall telling Plaintiff that you
 7 loved her?
 8 A. When? Well, I did.
 9 Q. Let's start with if you recall.
 10 Do you recall telling Plaintiff you
 11 loved her?
 12 A. I said that many times when I was with
 13 her.
 14 Q. And when did you first start telling
 15 Plaintiff that you loved her?
 16 A. 24 hours after I -- she landed, you
 17 know, really -- I really felt that.
 18 Q. Okay. So, you're talking about a time
 19 when she landed.
 20 Do you know when that was?
 21 And what do you mean landed? Let's
 22 start with what you mean and then figure out the
 23 time.
 24 A. Okay. I tell a lot of people that I
 25 love them, but what I told her within maybe 48 hours

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1 of when she landed in August of 2014, I said "I'm
 2 falling in love with you."
 3 Q. Okay.
 4 A. She had said it to me and I said, "Oh,
 5 I'm feeling the same way."
 6 Q. How are you so sure that she landed in
 7 August 2014?
 8 And do you mean L.A., she flew into L.A.
 9 in August 2014?
 10 A. Yes.
 11 Q. And how are you so sure it was August
 12 2014 when she arrived?
 13 A. I picked her up at the airport.
 14 Q. So there's no doubt in your mind that
 15 she arrived in August 2014?
 16 A. Yeah. That's how I remember it.
 17 Q. It could have been a month earlier or a
 18 month later, or it was definitely she arrived in
 19 August?
 20 A. Definitely in August.
 21 Q. And how are you so sure?
 22 A. I picked her up.
 23 Q. You're just convinced it was definitely
 24 August?
 25 A. (No audible response.)

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1 Q. Okay. And that was a yes?
 2 A. Yes. Sorry.
 3 Q. So, did you ever come to think that
 4 Plaintiff was your girlfriend?
 5 A. I don't think I thought in those terms.
 6 I think -- I don't think in terms of girlfriend.
 7 Q. Okay. What do you think in terms of?
 8 A. You meet someone new that's really
 9 exciting, and you can't define it, so you don't know
 10 what it is.
 11 Q. Okay. Did you have a physically
 12 intimate relationship with Plaintiff?
 13 MR. PARMELEE: Objection as to -- it's
 14 vague and ambiguous.
 15 What do you mean by --
 16 BY MR. WITTENBERG:
 17 Q. Do you understand what I mean by
 18 physically intimate?
 19 A. Did we make love? We did not.
 20 Q. Did you have any other physical intimacy
 21 with Plaintiff?
 22 A. Yes.
 23 Q. Okay. When did that begin?
 24 A. The second day after she had landed.
 25 Q. When she came to visit L.A., you mean?

109	<p>1 A. Uh-huh.</p> <p>2 Q. Did you take her to your home when she</p> <p>3 arrived in L.A. --</p> <p>4 A. No.</p> <p>5 Q. -- take Plaintiff to your home when she</p> <p>6 arrived in L.A.?</p> <p>7 A. No.</p> <p>8 Q. Why not?</p> <p>9 A. I was going through a rocky period on</p> <p>10 all levels. I had felt persecuted from things that</p> <p>11 had happened where I was being blamed and arrested</p> <p>12 for phone calls that were later proven by the Napa</p> <p>13 Sheriffs Department that I did not make.</p> <p>14 So I was feeling a fair amount of</p> <p>15 prosecute -- persecution.</p> <p>16 Q. That's why you didn't take Plaintiff to</p> <p>17 your home when she arrived?</p> <p>18 A. No.</p> <p>19 Q. Okay. So why didn't you take Plaintiff</p> <p>20 to your home?</p> <p>21 A. I was planning on moving out of that</p> <p>22 home. And why would I want to introduce her to</p> <p>23 Linda?</p> <p>24 Q. So you didn't take her to your home</p> <p>25 because you were living with Linda Barrett at the</p>	111	<p>1 told -- Plaintiff had told me the name of her</p> <p>2 complication, a gentleman named Patrice, and then a</p> <p>3 gentleman who liked her who was helping her out but</p> <p>4 also was --</p> <p>5 Q. Okay. So you were in a complicated</p> <p>6 relationship with Linda Barrett whom you were living</p> <p>7 with at the time that Plaintiff visited Los Angeles,</p> <p>8 correct?</p> <p>9 A. I would not use the words "complicated."</p> <p>10 I would use the words that it was a relationship</p> <p>11 that was formerly intimate that was going through</p> <p>12 transitions.</p> <p>13 Q. Okay. Did you ever describe yourself as</p> <p>14 being Ms. Barrett's roommate?</p> <p>15 A. To whom?</p> <p>16 Q. Anybody?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay. And how long was she your</p> <p>19 roommate in this description you used?</p> <p>20 A. Since March of 2014.</p> <p>21 Q. Okay. And your son -- does your son</p> <p>22 live with you and Ms. Barrett?</p> <p>23 A. No. My -- my son is in Los Gatos. When</p> <p>24 I see him I -- we do travel. We were down in</p> <p>25 L.A. --</p>
110	<p>1 time?</p> <p>2 A. Yes.</p> <p>3 Q. Who at the time was your girlfriend or</p> <p>4 not?</p> <p>5 A. No. She was my best friend. We had had</p> <p>6 a -- how can I put this?</p> <p>7 Q. Well, you can put it this way. You</p> <p>8 wanted to conceal Linda Barrett's existence from</p> <p>9 Plaintiff, correct?</p> <p>10 MR. PARMELEE: Objection. Misstates</p> <p>11 testimony.</p> <p>12 THE WITNESS: That's not true.</p> <p>13 BY MR. WITTENBERG:</p> <p>14 Q. Okay. When did you first tell Plaintiff</p> <p>15 about Linda Barrett?</p> <p>16 A. Within the first couple days.</p> <p>17 Q. First couple days of what?</p> <p>18 A. Of meeting her.</p> <p>19 Q. You mean in August 2014 when you think</p> <p>20 she arrived?</p> <p>21 A. August of 2014 before we had even kissed</p> <p>22 I told her "I have a complication."</p> <p>23 And she had said, "I have some things,</p> <p>24 but let's not worry about that now."</p> <p>25 So, yes, it was brought up. She had</p>	112	<p>1 Q. Who is your son with in Los Gatos?</p> <p>2 A. With his mother.</p> <p>3 Q. He lives with his mother full time?</p> <p>4 A. Not full time. He's with -- with me.</p> <p>5 We have shared custody.</p> <p>6 Q. Okay.</p> <p>7 A. Right now, because I'm concentrating on</p> <p>8 work here, it's not really feasible to take him down</p> <p>9 to work and then drive up 320 miles to --</p> <p>10 Q. So, when you came -- first started</p> <p>11 communicating with Plaintiff, do you recall that you</p> <p>12 told her you were an inventor? Is that right?</p> <p>13 A. I told her I was working on inventions.</p> <p>14 I told her that I was a composer, and as a composer</p> <p>15 all you do is invent.</p> <p>16 Q. Okay. Did you tell her -- you did say,</p> <p>17 I believe you said, you were working on inventions,</p> <p>18 right?</p> <p>19 A. I -- I had not talked to her before she</p> <p>20 made a donation. Just so you know, we did not</p> <p>21 physically talk on the phone.</p> <p>22 Q. Okay. So the communications were how?</p> <p>23 A. Facebook.</p> <p>24 Q. Is that it?</p> <p>25 A. No. I think Google. I think there were</p>

<p style="text-align: right;">113</p> <p>1 some communications on my Google.</p> <p>2 Q. Google what?</p> <p>3 A. Google is a search engine, but Google</p> <p>4 mail.</p> <p>5 Q. So you use gmail?</p> <p>6 A. Yeah.</p> <p>7 Q. So you're saying you communicated with</p> <p>8 Plaintiff via Facebook messages and email?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And during that time period</p> <p>11 before Plaintiff transferred money to you, isn't it</p> <p>12 correct that you told her you were working on</p> <p>13 inventions with other people?</p> <p>14 A. I didn't say I was working on inventions</p> <p>15 with other people before she transferred money to</p> <p>16 me.</p> <p>17 Q. Okay. Did you ever tell her you were</p> <p>18 working on inventions with other people?</p> <p>19 A. I told her -- she met Brian Light.</p> <p>20 Q. I don't know about Brian Light.</p> <p>21 But if you don't mind, a "yes" or "no,"</p> <p>22 and then you can explain it if it's necessary.</p> <p>23 But did you ever tell her you were</p> <p>24 working on inventions with other people?</p> <p>25 A. In August she met people who wanted to</p>	<p style="text-align: right;">115</p> <p>1 your testimony?</p> <p>2 A. I'm going to say no to I told her I was</p> <p>3 I was working with others. I'm going to sa that we</p> <p>4 mutually went to see someone to listen to his idea,</p> <p>5 and I did become interested.</p> <p>6 So I'm going to say the answer to that</p> <p>7 is no.</p> <p>8 Q. Okay. Now, we've discussed a couple of</p> <p>9 inventions, but I just want to be clear.</p> <p>10 There's the underground drone, then</p> <p>11 there's the replicating sunlight.</p> <p>12 What other inventions did you at any</p> <p>13 time since you've known Plaintiff work on? Besides</p> <p>14 music, underground drones and replicating sunlight.</p> <p>15 A. Creating a -- a methodology of</p> <p>16 communication that has to do with encrypting music.</p> <p>17 So, in broad terms, encryption.</p> <p>18 Q. Okay. Is this a software programming?</p> <p>19 A. It's a music programming. Software</p> <p>20 programming encryptions do not work. You've not</p> <p>21 PGP, stands for pretty good protection, that was</p> <p>22 invented in 1991, supposedly it's unhackable. The</p> <p>23 NSA has gotten into it a long time ago.</p> <p>24 Anything that can be encrypted can be</p> <p>25 hacked. And I'm attempting to solve that problem</p>
<p style="text-align: right;">114</p> <p>1 work and were inventing people -- inventing</p> <p>2 things --</p> <p>3 Q. Did you ever tell her you were working</p> <p>4 on inventions with other people?</p> <p>5 There's -- you know, "yes," "no" or "I</p> <p>6 don't recall" will be fine.</p> <p>7 A. I don't understand your question.</p> <p>8 And can I say something? And maybe it</p> <p>9 can be rephrased. If I'm taking her to a meeting</p> <p>10 with someone who says "I can provide 24-hour light,"</p> <p>11 and I'm saying "I might want to be involved in</p> <p>12 something like this if it can be applied towards</p> <p>13 crops rather than your marijuana plants," then</p> <p>14 technically I am telling Isabella that I want to be</p> <p>15 involved in inventions with other people.</p> <p>16 So in answer to your question, I guess</p> <p>17 it's yes.</p> <p>18 Q. So your testimony is that you took</p> <p>19 Plaintiff while she was visiting here in L.A. to</p> <p>20 meet with some person who was developing light? Is</p> <p>21 that what your testimony is?</p> <p>22 A. We both met him at the same time, yes.</p> <p>23 Q. And therefore, that's -- that's how you</p> <p>24 told her you're working with other people on</p> <p>25 inventions, by taking her to meet someone? That's</p>	<p style="text-align: right;">116</p> <p>1 through music.</p> <p>2 Q. Are you working with anybody you can</p> <p>3 name right now on that product -- project?</p> <p>4 A. Richard Letch.</p> <p>5 Q. Okay. How do you spell that last name?</p> <p>6 A. L-e-t-c-h.</p> <p>7 Q. Do you have his contact information?</p> <p>8 A. (312) 918-6667.</p> <p>9 Q. Where does Mr. Letch reside?</p> <p>10 A. Los Angeles.</p> <p>11 Q. Okay. How did you meet Mr. Letch?</p> <p>12 A. I put out a series of puzzles on the</p> <p>13 internet over the past two or three years, and no</p> <p>14 one's been able to solve them. He was.</p> <p>15 Q. Okay. Where did you put these puzzles</p> <p>16 out on the internet?</p> <p>17 A. 4Chan, that's 4, the number, and then</p> <p>18 C-h-a-n.</p> <p>19 Q. Is that .com?</p> <p>20 A. Yeah. It's .org, I believe.</p> <p>21 Q. Have you ever put any of these on your</p> <p>22 YouTube channel?</p> <p>23 A. Yes. Hints of it.</p> <p>24 Q. What's that?</p> <p>25 A. Sure.</p>

<p style="text-align: right;">117</p> <p>1 Q. Yeah? And what did you call it?</p> <p>2 A. Cicada 3301.</p> <p>3 Q. Okay. Did you ever offer a prize?</p> <p>4 A. Yeah. \$100,000 prize, a piece of</p> <p>5 floorboard from a place where Mozart resided in</p> <p>6 1784.</p> <p>7 Q. So it wasn't \$100,000 in cash that you</p> <p>8 offered?</p> <p>9 A. No.</p> <p>10 Q. And did you give this floorboard to</p> <p>11 Mr. Letch?</p> <p>12 A. He didn't figure it out by June 2014</p> <p>13 which was the cutoff for --</p> <p>14 Q. So other than this encryption and the</p> <p>15 ones we're already asked about, the encryption, the</p> <p>16 underground drone, the replicating sunlight and your</p> <p>17 music, are there any other inventions you've worked</p> <p>18 on since January 2014?</p> <p>19 A. Other than those four things, yeah.</p> <p>20 Q. Okay. Could you name them?</p> <p>21 A. Theoretical. I considered --</p> <p>22 Q. Let's make a distinction between an idea</p> <p>23 that comes into your head and something you've</p> <p>24 actually worked on and have any evidence that --</p> <p>25 worked on in the real world.</p>	<p style="text-align: right;">119</p> <p>1 KitKat, which is one of the top ten earworms.</p> <p>2 So, composers and scientists tend to do</p> <p>3 everything in here (indicating). It's not all</p> <p>4 Edison. A lot of the Nobel prize winners have come</p> <p>5 up with theories that have broken ground.</p> <p>6 Q. So, what were these other inventions</p> <p>7 that you wanted to tell us about?</p> <p>8 A. That I want to tell you about?</p> <p>9 I'm not looking to -- I'm not wanting to</p> <p>10 tell, but since you asked --</p> <p>11 Q. Okay.</p> <p>12 A. -- my idea was that in the Middle East</p> <p>13 you've got sand. What is sand? Sand is silica,</p> <p>14 it's glass essentially. And one can use the</p> <p>15 reflective qualities of glass to glean information</p> <p>16 on things that perhaps satellites or air recon --</p> <p>17 air surveillance can't.</p> <p>18 So the bottom line would be to create a</p> <p>19 type of sand that would blend into a dusty street,</p> <p>20 let's say, in Mosul. Where ISIS is in control and</p> <p>21 all of a sudden you were monitoring everything that</p> <p>22 was going on and they don't know it because all they</p> <p>23 see is dust or sand.</p> <p>24 Q. So other than having this idea in your</p> <p>25 head, is there any evidence that you worked on this</p>
<p style="text-align: right;">118</p> <p>1 Do you understand my distinction?</p> <p>2 A. I think that your distinction means</p> <p>3 something that is physically built as opposed to,</p> <p>4 you know, Toshiant's (phonetic) quote.</p> <p>5 Q. Well, the distinction -- you know, I'm</p> <p>6 sure you have ideas every day. Am I right?</p> <p>7 A. I think we all do.</p> <p>8 Q. And a lot of these ideas are probably</p> <p>9 inventions that come into your mind?</p> <p>10 A. Yeah.</p> <p>11 Q. Now, when I ask you if you've worked on</p> <p>12 any inventions, are you telling me that when an idea</p> <p>13 comes into your mind and you think about it, that</p> <p>14 means you've worked on an invention?</p> <p>15 A. Well, that's kind of a matter of degree.</p> <p>16 An idea that comes in Mozart's mind in the summer of</p> <p>17 1788 was the Jupiter Symphony, you know, one of the</p> <p>18 greatest symphony's ever. So it's hard to say that.</p> <p>19 What I'm saying is that my expertise is</p> <p>20 in music and composing, but my love and where I want</p> <p>21 to go is in theoretical science.</p> <p>22 Mr. Levine, just so you know, what he</p> <p>23 did between these two years (indicating), was make a</p> <p>24 million dollars a year writing the music to Cold</p> <p>25 Case, which was a big show. He wrote the jingle to</p>	<p style="text-align: right;">120</p> <p>1 project?</p> <p>2 A. Conversations with Seval Oz, who was, as</p> <p>3 I said, one of the team members for this project</p> <p>4 that we were on. Seval was in GoogleX, which is the</p> <p>5 experimental part of Google. So they deal with</p> <p>6 theoretical science.</p> <p>7 Q. When was the last time you spoke to</p> <p>8 Mr. Oz?</p> <p>9 A. I haven't spoken to Seval in two years.</p> <p>10 Seval is a female, by the way. She had --</p> <p>11 Q. Okay. Thank you.</p> <p>12 A. It's okay. She had a husband who had</p> <p>13 a -- had a stroke and is incapacitated.</p> <p>14 Q. Okay. Have you worked on any other</p> <p>15 inventions that come to mind now since January 2014?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What's that?</p> <p>18 A. If you were to drive into downtown</p> <p>19 Los Angeles and you saw buildings looking like</p> <p>20 they've been hit by a nuclear blast, that would be a</p> <p>21 psychologically terrible thing to do.</p> <p>22 So the thing that I'm trying to work on</p> <p>23 is to create large holographic images to impose upon</p> <p>24 metropolitan areas for psychological effect. And</p> <p>25 this would not be for New York City or the Homeland.</p>

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1 I'm talking that if it does come down that we are
 2 facing something very dire that would be something
 3 that could hit a large population of the enemy.
 4 So that's something that we're working
 5 on.
 6 Q. Who is "We"?
 7 A. Well, Michael Levine and I work
 8 frequently with ideas.
 9 Oasis was originally going to be a
 10 musical library. I was talking with him a long time
 11 ago about that. Michael is not only a -- a composer
 12 but he is also a writer. He's been a writer since
 13 the '90's.
 14 Q. Is he a very good friend of yours,
 15 Michael Levine?
 16 A. Yeah. He's become a dear friend.
 17 Q. Okay.
 18 A. He's also powerful -- he's the
 19 director -- or one of the governors of the Academy
 20 of Television Sciences.
 21 Q. Does he pay you for any of the work you
 22 perform?
 23 A. No.
 24 Q. Has he ever paid you for any work that
 25 you've done?

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1 A. He's never paid me a penny for any of
 2 the work I've performed.
 3 Q. Has any of the companies he's worked for
 4 ever paid you for any work you've performed?
 5 A. Absolutely not. Not a penny.
 6 Q. Did you ever tell Plaintiff that you're
 7 an international businessman?
 8 A. No. I don't recall saying I'm an
 9 international businessman.
 10 Q. Were you ever an international
 11 businessman?
 12 A. No.
 13 Q. Okay.
 14 A. I thought it was -- I thought you had
 15 asked me if I had done a bunch of business and had
 16 been paid for concerts and all that. No.
 17 I've been an international traveler,
 18 international observer. But specific to say
 19 international businessman? No.
 20 Q. Okay.
 21 A. And, Mr. Wittenberg, I have to use the
 22 restroom one more time. I'm sorry. The coffee's
 23 going right through. I'll just be a minute.
 24 MR. WITTENBERG: All right. We'll go
 25 off the record.

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1 (Brief recess.)
 2 BY MR. WITTENBERG:
 3 Q. Okay. Now, it is correct that you told
 4 Plaintiff that you work with the United States
 5 Government on dealings in Iraq?
 6 A. No.
 7 Q. Okay. Never told Plaintiff that?
 8 A. No. What I told Plaintiff is
 9 Afghanistan.
 10 Q. Okay. Why did you tell Plaintiff you
 11 have dealings with the U.S. Government in
 12 Afghanistan?
 13 A. She had -- Plaintiff had described to me
 14 that her father was known as the Butcher of Vietnam,
 15 and he had been a commando in the French Special
 16 Forces. She had also described that she had been
 17 involved with a man named Patrice, who was a
 18 commando-in-training who had put her in the hospital
 19 and been physically violent with her.
 20 Q. Go on.
 21 A. She had expressed a desire to get into
 22 all sorts of work.
 23 Q. Okay. Do you recall when Plaintiff
 24 first told you her dad was in Special Ops?
 25 A. It would have been the second or third

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1 day.
 2 Q. Second or third day of what?
 3 A. Of when she was in L.A.
 4 Q. Okay. But not before that?
 5 A. Not that I can recall.
 6 Q. So because Plaintiff's father worked for
 7 Special Ops, you thought you would want to share
 8 with her your, I guess, time in Afghanistan?
 9 A. No. She had explained to me that he was
 10 in Vietnam, he was known as the Butcher of Vietnam.
 11 I remember those words.
 12 And then what had come up is that
 13 Plaintiff has -- had explained that she had
 14 experienced -- I don't like talking about this, but
 15 she had some interesting things in her childhood
 16 that I don't want to mention here out of respect for
 17 Plaintiff.
 18 And she had then told me that as an
 19 adult, that there had been a person she was involved
 20 with named Patrice who had physically brutalized
 21 her, put her in the hospital and had an open threat
 22 against her life.
 23 The man, Patrice, lives in Dublin. She
 24 lives a little bit outside of Dublin.
 25 Q. Now, she told you a lot of this stuff --

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1 she mentioned this stuff to you that you just
 2 described prior to her transferring money to you; is
 3 that right?
 4 **A. No.**
 5 Q. None of it?
 6 **A. No.**
 7 Q. All this was after she transferred money
 8 to you?
 9 **A. Yes.**
 10 Q. Okay. When did you first discuss a
 11 business concept with Plaintiff?
 12 MR. PARMELEE: Vague and ambiguous as to
 13 "business concept."
 14 THE WITNESS: Which business concept?
 15 BY MR. WITTENBERG:
 16 Q. Okay. Did you discuss doing business
 17 with Plaintiff at any time?
 18 **A. Oh, yeah.**
 19 Q. Okay. When did you first discuss doing
 20 business with Plaintiff?
 21 **A. Literally two or three days after she**
 22 **landed. She said, "Oh, I just want to take a**
 23 **vacation."**
 24 **I said, "We can do these things. You**
 25 **know, I've got these ideas."**

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1 **She had a great idea, which was to start**
 2 **to network artists everywhere.**
 3 Q. When did she first tell you this idea?
 4 **A. Specifically, three, four days after she**
 5 **landed.**
 6 Q. So did she ever tell you a business idea
 7 that she was interested in before she transferred
 8 you money?
 9 **A. I don't recall, no.**
 10 Q. So it's your testimony that Plaintiff
 11 never told you about a business idea she had until
 12 after she transferred you money; is that correct?
 13 **A. That's correct.**
 14 Q. Okay. And you never told her about
 15 businesses that you were interested in before she
 16 transferred you money; is that correct?
 17 **A. That's correct.**
 18 Q. So you only told her about business
 19 questions after she transferred you money?
 20 **A. No. She knew my business. She knew my**
 21 **business as a composer. I wrote what I had planned**
 22 **to do. I even posted how I was looking at a TV**
 23 **development deal.**
 24 **These are in stone on my YouTube**
 25 **channels. You can look at the dates of where I was**

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1 **going with it.**
 2 Q. So just for the sake of my clarity, when
 3 was the first time you discussed the business
 4 with -- a business that you were going to do with
 5 Plaintiff?
 6 MR. PARMELEE: Objection. And this --
 7 this is probably easy to clarify. Do you mean first
 8 discussed with Plaintiff or a business that they
 9 were going to go into together? Like a business
 10 he's intending that he just discussed or were
 11 discussing about going in together?
 12 MR. WITTENBERG: I'm just trying to draw
 13 that out of him and find out what happened. That's
 14 what I'm trying to find out.
 15 MR. PARMELEE: Well, objection, then,
 16 vague and ambiguous.
 17 You can go ahead and answer the
 18 question.
 19 THE WITNESS: I have nothing to hide.
 20 BY MR. WITTENBERG:
 21 Q. When did you first have a discussion
 22 with Plaintiff about doing a business together?
 23 **A. Between three and four days after she**
 24 **landed.**
 25 Q. And that's after she transferred you

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1 money, correct?
 2 **A. Well over a month. I think she**
 3 **transferred in June. She wrote an email saying no**
 4 **strings attached. She had never spoken to me on the**
 5 **phone before she transferred money. I did not ask**
 6 **for it. She did not know my financial situation.**
 7 Q. So she never knew your -- you never told
 8 her your financial situation before she transferred
 9 you money, right?
 10 **A. Mr. Wittenberg, I didn't even ask for**
 11 **money.**
 12 Q. I understand. But in order to have a
 13 clear record, I need answers to my questions.
 14 **A. Sure.**
 15 Q. You never told her your financial
 16 situation before she sent you money, correct?
 17 **A. Correct.**
 18 Q. And so as far as she knew, you could
 19 have been very wealthy or you could have been broke.
 20 That's what you believe, right?
 21 **A. Correct.**
 22 Q. And you wanted her to believe you were
 23 wealthy, correct?
 24 **A. No.**
 25 Q. But you never told her that you were

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1 broke, correct?
 2 Let me establish this for the record.
 3 Were you broke at the time?
 4 **A. Yeah.**
 5 Q. You didn't have any money?
 6 **A. Not much.**
 7 Q. And you had a lot of debts?
 8 **A. I -- I had some debts. Not -- not a**
 9 **lot. Not --**
 10 Q. But you never told Plaintiff that you
 11 were broke?
 12 **A. No.**
 13 Q. Ever?
 14 **A. No.**
 15 Q. Why not?
 16 **A. Why would you make that kind of**
 17 **declarative statement? I think you'd have to be an**
 18 **idiot to do so.**
 19 Q. Weren't you telling her at the time that
 20 you were off to some big Hollywood movie meeting
 21 that you were involved with?
 22 **A. Sure.**
 23 Q. Okay. Weren't you also telling her that
 24 you were involved in very exciting new invention
 25 projects?

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1 **A. I was. I have been.**
 2 Q. You were involved in all these wonderful
 3 things; meanwhile behind the scenes you're broke,
 4 right?
 5 **A. Brian Weiner --**
 6 Q. It's just a "yes" or "no" question.
 7 **A. Okay. I don't think I was broke.**
 8 Q. Okay.
 9 **A. But I never tried to portray myself as a**
 10 **wealthy individual or an insolvent individual.**
 11 Q. Didn't you portray yourself as a
 12 composer of over 8,000 original pieces of music?
 13 **A. Yes. I have over 9,000 now.**
 14 Q. Didn't you portray yourself as somebody
 15 who composed CD Heaven with over 5 million views on
 16 YouTube?
 17 **A. It's over 15 million.**
 18 Q. Didn't you portray yourself as somebody
 19 who sold North Bay Entertainment Co.?
 20 **A. Yeah.**
 21 Q. Yeah.
 22 **A. Yeah, I did.**
 23 Q. Didn't you portray yourself as someone
 24 who founded Intelibaby with Robert Miller in 2000?
 25 **A. Did I tell her that?**

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1 Q. Did you portray yourself in that way?
 2 **A. No.**
 3 Q. Your Facebook page didn't list that
 4 stuff?
 5 MR. PARMELEE: Objection. Vague as to
 6 time.
 7 THE WITNESS: I don't remember.
 8 BY MR. WITTENBERG:
 9 Q. Didn't you have your Facebook page with
 10 a background about what you've done in your career?
 11 **A. I think that -- that my entire social**
 12 **media would have listed my achievements.**
 13 Q. You drafted your social media, correct?
 14 You put on there what you wanted people to see about
 15 you, right?
 16 **A. Well, I had -- my first wife Lori**
 17 **built --**
 18 Q. Fine. But you authorized -- whatever is
 19 on your social media describing your business, you
 20 authorized it, right?
 21 **A. Yes.**
 22 Q. You knew it was on there?
 23 **A. Absolutely.**
 24 Q. Because you wanted people to think of
 25 you that way, right?

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1 **A. Yeah.**
 2 Q. So, when you describe yourself as
 3 somebody who launched successful music for infant
 4 series of CD's and attained retail traction in 20
 5 countries, you wanted people to think you were a
 6 successful businessman, right?
 7 **A. It was not a misstatement.**
 8 Q. Okay. That you had Target, major other
 9 retailers carrying Thomas Schoenberger compositions
 10 in their aisles; is that true?
 11 **A. Yeah.**
 12 Q. But did you get paid for that?
 13 **A. We were. This was the Intelibaby**
 14 **project that I mentioned earlier, Mr. Wittenberg.**
 15 Q. And we've already mentioned you composed
 16 Heaven and opera and numerous piano CD's, winner of
 17 Dr. Troy top ten CD award? This true, all this
 18 stuff?
 19 **A. Yeah.**
 20 Q. And you wanted it out there to show that
 21 you're a successful businessman?
 22 MR. PARMELEE: Objection. There's no --
 23 no question there.
 24 MR. WITTENBERG: That is the question.
 25 MR. PARMELEE: It's a statement.

133	<p>1 BY MR. WITTENBERG:</p> <p>2 Q. Correct? Is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 MR. WITTENBERG: Okay. Let's take a</p> <p>6 break. Let's grab lunch. It's 12:20.</p> <p>7 If it's okay, we'll start up here at</p> <p>8 1 o'clock.</p> <p>9 We'll go off the record.</p> <p>10 MR. PARMELEE: Sure.</p> <p>11</p> <p>12 (Whereupon at 12:21 P.M. a lunch</p> <p>13 recess was taken.)</p> <p>14 * * *</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	135	<p>1 you discussed with her in some way?</p> <p>2 A. No. What I'm relating it to is that I</p> <p>3 didn't know her.</p> <p>4 Q. Okay. So, prior to her transferring</p> <p>5 money to you on or about June 19th, there was no</p> <p>6 mention of investment together, correct?</p> <p>7 A. No.</p> <p>8 Q. No mention about doing a project called</p> <p>9 Oasis together?</p> <p>10 A. No. There was no mention of us doing</p> <p>11 a --</p> <p>12 Q. No mention of a project between the two</p> <p>13 of you for investment purposes at all; is that</p> <p>14 right?</p> <p>15 A. None.</p> <p>16 Q. And how can you be so sure of that?</p> <p>17 Have you reviewed material prior to</p> <p>18 coming to this deposition?</p> <p>19 A. I reviewed every single communication</p> <p>20 that I had with her. And the only discussions were</p> <p>21 after she had made a large donation to me where she</p> <p>22 had written in her own words "no strings attached."</p> <p>23 I had never spoken to her on the phone.</p> <p>24 She didn't tell me what amount she was sending. And</p> <p>25 I was in a state of immense gratitude.</p>
134	<p>1 SANTA MONICA, CALIFORNIA</p> <p>2 DECEMBER 1, 2015</p> <p>3 * * *</p> <p>4</p> <p>5 (Whereupon at 1:06 P.M. the</p> <p>6 deposition proceedings were</p> <p>7 resumed.)</p> <p>8</p> <p>9 EXAMINATION (Resumed)</p> <p>10 BY MR. WITTENBERG:</p> <p>11 Q. Okay. So, Mr. Schoenberger, I think I'm</p> <p>12 correct -- tell me if you disagree -- that Plaintiff</p> <p>13 transferred money to you, let's say, June 19th.</p> <p>14 Does that sound about right?</p> <p>15 A. It sounds right, yeah.</p> <p>16 Q. And prior to leaving for the break I</p> <p>17 believe you said before Plaintiff transferred money</p> <p>18 to you, you had no discussions with her about doing</p> <p>19 business together?</p> <p>20 A. That's correct. That's correct. I</p> <p>21 only -- I only learned that Plaintiff was a</p> <p>22 female -- I'm guesstimating, but I believe in May.</p> <p>23 So that would have been, you know, less than 50 days</p> <p>24 that --</p> <p>25 Q. Are you relating that to the business</p>	136	<p>1 Q. Okay.</p> <p>2 A. Oasis, Mr. Wittenberg, Oasis was a</p> <p>3 concept that was originally for my music library. I</p> <p>4 had gone to Dubai in the UAE in December of 2012,</p> <p>5 and I was amazed at how we were -- you know, I was</p> <p>6 guest of a -- of Sheikh. And we were amazed at how</p> <p>7 the United Arab Emirates had reclaimed the desert.</p> <p>8 Q. Okay. So, going back to the time period</p> <p>9 before she transferred the money, you say you</p> <p>10 checked your emails from that time period?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Do you recall saying that you</p> <p>13 didn't have access to emails prior to that period</p> <p>14 because somebody accessed your accounts?</p> <p>15 A. No. The hack that took place was in May</p> <p>16 of 2015. That would have been a full year later.</p> <p>17 Q. Okay. Do you recall ever saying that</p> <p>18 Linda Barrett accessed your accounts and maybe made</p> <p>19 some changes?</p> <p>20 A. Linda Barrett accessed my accounts well</p> <p>21 after May 2014.</p> <p>22 Q. So then you should -- so I guess the</p> <p>23 question is was there any -- any reason you weren't</p> <p>24 able to access all of the emails on your computer</p> <p>25 prior to June -- the time Plaintiff transferred you</p>

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1 money?
 2 **A. It's conceivable that I could have been**
 3 **hacked.**
 4 Q. But you don't -- you don't know?
 5 We don't want to speculate. You don't
 6 know --
 7 **A. So, prior to transferring the money, no,**
 8 **I was in full control and --**
 9 Q. So you searched all your emails prior to
 10 the time you were -- Plaintiff transferred you money
 11 on or about June 19th?
 12 **A. Yes.**
 13 Q. And there is no indication at all in
 14 your mind that absolutely not, she -- there was no
 15 discussion about investments that she made with you?
 16 **A. I can say emphatically no.**
 17 Q. Okay.
 18 MR. WITTENBERG: We'll mark this as
 19 Exhibit 1.
 20 (Whereupon the document referred
 21 to was marked Plaintiff's
 22 Exhibit 1 by the Certified
 23 Shorthand Reporter and is attached
 24 hereto.)
 25 MR. WITTENBERG: This can go to

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1 Mr. Schoenberger after you mark it.
 2 THE WITNESS: Thank you.
 3 MR. WITTENBERG: I'm sorry. I don't
 4 have a copy.
 5 MR. PARMELEE: That's okay.
 6 THE WITNESS: Okay. So on this one
 7 dated June 17th --
 8 BY MR. WITTENBERG:
 9 Q. Let me walk -- if you don't mind, I'll
 10 walk you through it so we have some structure.
 11 **A. Sure.**
 12 Q. If you turn to page two of three, there
 13 is an email down from the --
 14 You know, you understand how emails go
 15 in order?
 16 **A. Sure.**
 17 Q. And so the first email is usually at the
 18 bottom of the page and you work your way back up.
 19 There's an email that shows on June 17,
 20 2014 at 5:49 A.M.
 21 Do you see that one?
 22 **A. Yeah.**
 23 Q. It's from isabellegauthier@hotmail, and
 24 she writes,
 25 "I just thought of something. You

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1 are launching a music production
 2 Sophia."
 3 Do you recall that you were launching,
 4 Mr. Schoenberger, a music production company called
 5 "Sophia" at that time?
 6 **A. Yeah. I had -- Sophia is my stage name,**
 7 **is my YouTube -- my YouTube channel is Sophia Musik**
 8 **which was launched in 2013.**
 9 Q. Okay. Did you tell Plaintiff -- the
 10 Plaintiff that was a music production company you
 11 were launching?
 12 **A. Yeah.**
 13 Q. Is it, in fact, a music production
 14 company that you launched?
 15 **A. Yes.**
 16 Q. And what does it do as a music
 17 production company?
 18 **A. Teaches people -- it is kind of a**
 19 **learning tool through my music to send a message**
 20 **that our privacy is being encroached.**
 21 Q. You just said it's a YouTube channel.
 22 **A. Yes.**
 23 Q. So it's a YouTube channel?
 24 **A. It's a YouTube channel that features my**
 25 **music along with graphic narratives.**

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1 Q. Is it formed as a company of your own?
 2 **A. Yeah.**
 3 Q. Is it an L.L.C.?
 4 **A. No.**
 5 Q. Corporation?
 6 **A. No.**
 7 Q. An organization of any type?
 8 **A. It's a -- it's a YouTube channel that**
 9 **does not have any business merit or business -- it's**
 10 **not an L.L.C. it's not a private corporation. It's**
 11 **my music.**
 12 Q. Does it -- is it a company in business
 13 for profit?
 14 **A. It was not for profit. It relied on**
 15 **donations, which I had on my front page which said,**
 16 **you know, feel free to donate.**
 17 Q. Okay. So it sounds like you're saying
 18 to me this music production company you told
 19 Plaintiff you were doing is just you starting a
 20 YouTube website and posting your compositions; is
 21 that right?
 22 **A. It's more than that.**
 23 Q. Okay.
 24 **A. It's -- it's not just that. There were**
 25 **messages within the narrative. These were, you**

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1 **know, mini-movies of sorts. They're meant to teach.**
 2 **They're meant to -- as a call to the people.**
 3 Q. Okay. You go on to say -- as you see
 4 here, Plaintiff writes,
 5 "Building all sorts of wonderful
 6 gadgets and tools."
 7 So you've told Plaintiff that this is
 8 music production company that you're launching and
 9 you're also building all sorts of wonderful gadgets
 10 and tools.
 11 Do you remember telling her that?
 12 **A. No. She wrote this.**
 13 Q. Okay. Do you remember telling her that?
 14 **A. No.**
 15 Q. Do you remember receiving this email?
 16 **A. Now that I read it, yeah.**
 17 Q. Okay. So, when she wrote that, building
 18 all sorts of wonderful gadgets and tools, you knew
 19 that she was writing it to you, but it wasn't true?
 20 **A. No. She wrote all sorts of things.**
 21 **When you read an email --**
 22 Q. Just focus on this one if you can,
 23 building all sorts of gadgets -- wonderful gadgets
 24 and tools.
 25 Did you understand that that was not

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1 true?
 2 **A. No.**
 3 Q. Because right now you're telling us --
 4 MR. PARMELEE: Objection. You're asking
 5 my client to speculate on her state of mind.
 6 MR. WITTENBERG: No. I'm asking your
 7 client --
 8 BY MR. WITTENBERG:
 9 Q. Is it true that you were building all
 10 sorts of wonderful gadgets and tools?
 11 **A. I --**
 12 MR. PARMELEE: Objection. Calls for him
 13 to speculate on her choice of language.
 14 BY MR. WITTENBERG:
 15 Q. I am not. I'm asking you if it's true
 16 that you were building all sorts of wonderful
 17 gadgets and tools? Yes or no?
 18 **A. I was not building all sorts of gadgets**
 19 **and tools.**
 20 Q. You were not -- did you ever tell her
 21 that you're not building all sorts of gadgets and
 22 tools?
 23 **A. I hadn't spoken to her.**
 24 Q. You emailed with her, right?
 25 **A. Yeah. But do you see gadgets and tools?**

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1 Q. Did you ever email her back and say "I
 2 don't know what you're talking about, gadgets and
 3 tools"?
 4 **A. Absolutely not.**
 5 Q. You didn't bother to tell her that she's
 6 not correct about what she assumes you do, which is
 7 building gadgets and tools?
 8 **A. I had never spoken to her,**
 9 **Mr. Wittenberg. She had used gadgets and tools.**
 10 **A gadget and a tool can be as simple as**
 11 **something that we use in a drum machine. A gadget**
 12 **and a tool can also refer to encryption within**
 13 **music, polyphony within music, which is two or more**
 14 **melodies at one time.**
 15 **She's talking about gadgets and tools.**
 16 **As I've already stated, I've never built a tool in**
 17 **my life.**
 18 Q. Or a gadget?
 19 **A. No. But this can be something --**
 20 **people --**
 21 Q. But it's fine with you that she
 22 understood that you were, and you didn't bother to
 23 tell her "I'm not doing that" or "what do you mean
 24 by that," correct?
 25 **A. What I can say is that I don't think you**

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1 **can produce an email for me prior to the receipt of**
 2 **the donation that ever says, quote-unquote, I am**
 3 **building gadgets and -- and tools. It's not even**
 4 **the language that I uses.**
 5 Q. Okay. Clearly when you received this,
 6 you understood that was Plaintiff's understanding of
 7 what you do, correct?
 8 **A. I don't -- I cannot say what her**
 9 **understanding is.**
 10 Q. Okay. And when you received this, you
 11 don't remember thinking one way or another about
 12 gadgets and tools?
 13 Did it just wash over you?
 14 **A. What I don't see, and I'm trying to find**
 15 **this, is my response to what -- hers came in at**
 16 **5:49 A.M. I have 1548 on the 17th. So I don't see**
 17 **a -- a response.**
 18 **What I do see is that she said,**
 19 **"I would like to offer you a humble**
 20 **contribution."**
 21 Q. Right. If you will go on.
 22 "I always wanted to invest" --
 23 **A. "Invest in something worthy."**
 24 Q. "Invest," what does the word "invest"
 25 mean to you, Mr. Schoenberger?

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1 **A. It could be anything. People --**
 2 Q. What did you take it to mean,
 3 Mr. Schoenberger?
 4 MR. PARMELEE: Objection. Calls for the
 5 deponent to speculate as to what she meant by
 6 "invest."
 7 MR. WITTENBERG: Thank you,
 8 Mr. Parmelee. I'm asking him what he understood the
 9 word "invest" to mean.
 10 THE WITNESS: "Invest" has a broad
 11 interpretation. You can invest as an entrepreneur,
 12 as a donator, you can invest in a business, which
 13 would have a bilateral contract attached to it along
 14 with terms.
 15 BY MR. WITTENBERG:
 16 Q. In your mind, what was happening here
 17 when Plaintiff is telling you that she always wanted
 18 to invest in something worthy. She has some money
 19 waiting to be invested in a vase.
 20 What did you understand -- how did you
 21 take this to mean?
 22 **A. I took her last statement where she**
 23 **says,**
 24 **"I live frugally and would like to**
 25 **offer you this draft so you can use**

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1 **it while money has still some**
 2 **value."**
 3 **Now, this has been predicated on things**
 4 **that she had written where she said money's not**
 5 **going to have any value. She felt like things were**
 6 **going to -- to hell. Right?**
 7 **And she said,**
 8 **"Again, this is just a thought."**
 9 **So that's -- that's how she ends her**
 10 **statement.**
 11 Q. Correct. She's proposing to make an
 12 investment with you, right?
 13 **A. Yeah.**
 14 Q. Okay. Now, your response right above it
 15 says --
 16 And again it's Thomas Schoenberger. Is
 17 that your email, thomasschoenbergermusik@gmail.com?
 18 **A. Yes, that is my email.**
 19 Q. Do you recall writing the response here
 20 where you say,
 21 "I would consider it but only if it
 22 is done as Isabelle's project"?
 23 **A. Yeah. I even called her afterwards, and**
 24 **she said, "No, no, no. That's not needed. No."**
 25 Q. What did you mean by when you wrote

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1 "only if it is done as Isabelle's project"?
 2 **A. That was my offer to her. And it was**
 3 **rejected on the phone.**
 4 Q. So in the first email from Plaintiff to
 5 you she says "I want to invest money."
 6 And then you say "Only if it is done as
 7 Isabelle's project."
 8 And what did you mean by that again,
 9 that it was -- that it was going to be Isabelle's
 10 project?
 11 **A. What I said is I want to create**
 12 **something big.**
 13 Q. What did you mean by "only if it is done
 14 as Isabelle's project"?
 15 **A. Oh, that was my counter-proposal to her**
 16 **to say wait, we can make this Isabelle's project.**
 17 **Then she and I had a conversation on the**
 18 **phone, she said "No, no, no." And then she wrote**
 19 **"No strings attached."**
 20 Q. Okay. Let's take this one step at a
 21 time.
 22 **A. Okay.**
 23 Q. Because you don't just write "But only
 24 if it's done as Isabelle's project."
 25 So what you're saying is "I will take

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1 the investment but only if it is yours as an owner,"
 2 right?
 3 **A. Not her -- that it's done under the name**
 4 **of Isabelle's projects. I wanted to have it as**
 5 **Isabella.**
 6 Q. Okay. So you never intended that she
 7 would have ownership of this project?
 8 **A. We hadn't discussed it. She was making**
 9 **a donation. I called her up to clarify this.**
 10 Q. So at the time -- when did you call her
 11 to clarify?
 12 **A. After -- maybe the 21st.**
 13 Q. 21st of what?
 14 **A. Of June.**
 15 Q. So you called her on June 21st?
 16 **A. June --**
 17 Q. 2014?
 18 **A. Right around there, yes.**
 19 Q. So you can get the phone records for
 20 that, I'm sure. You still use the same phone
 21 company?
 22 **A. Well, no, I don't use the same phone**
 23 **company.**
 24 Q. Do you know which company you were using
 25 when you called my client Plaintiff in June 21st --

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1 **A. I have to find out.**
 2 Q. If you can find out, we're going to
 3 sends you a request for your phone records.
 4 Okay?
 5 **A. Okay.**
 6 Q. Going past that, are you telling me that
 7 when you wrote this response to Plaintiff's
 8 suggestion to you that you enter into an investment
 9 together that you never intended her to have
 10 ownership of that?
 11 MR. PARMELEE: Objection.
 12 Mischaracterizes the statement of the document.
 13 But you can answer it.
 14 THE WITNESS: Yeah. No. This was --
 15 BY MR. WITTENBERG:
 16 Q. Okay. This was not a business email?
 17 **A. No.**
 18 Q. Is that your testimony?
 19 **A. "I would consider it, but only if**
 20 **it's done as Isabella's projects.**
 21 **And you would have 100 percent of**
 22 **the return."**
 23 **All right?**
 24 Q. What does "return" mean to you?
 25 **A. This to me is if it's a profit making**

150

1 **model, she would have 100 percent return. She**
 2 **rejected this, Mr. Weiner.**
 3 Q. You can put on your case with your
 4 attorney --
 5 **A. Sure.**
 6 Q. -- and tell us what she rejected later.
 7 **A. Yeah.**
 8 Q. Thank you. It's Mr. Wittenberg --
 9 **A. I'm sorry. Mr. Wittenberg.**
 10 Q. -- Mr. Schoenberger.
 11 **A. Yeah.**
 12 Q. It is very clear that you wrote this in
 13 response to my client's email that she would have
 14 100 percent of the return, correct?
 15 **A. Yeah.**
 16 Q. So the intention before she transferred
 17 you money was that you were talking about a business
 18 relationship, correct?
 19 **A. No.**
 20 Q. No? How am I wrong on that?
 21 **A. This was an offer that -- we were not**
 22 **talking about a business thing. She said "I want to**
 23 **make a donation."**
 24 **This was my response. The response was**
 25 **rejected.**

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1 Q. She didn't use the word "donation," did
 2 she?
 3 **A. Contribution.**
 4 Q. Yeah. Have you ever heard of a
 5 contribution as capital in business?
 6 **A. Have you ever heard of a contribution --**
 7 Q. Yes or no?
 8 **A. Yes.**
 9 Q. Okay. So contribution can be used in a
 10 business investment perspective, correct?
 11 **A. Why would she --**
 12 Q. Yes or no, Mr. Schoenberger?
 13 **A. Yes. Why would she -- why would she**
 14 **write back "no strings attached"?**
 15 Q. You can have your attorney cross-examine
 16 my client at that time.
 17 **A. Okay.**
 18 Q. For now you're here. We have a right to
 19 ask you questions --
 20 **A. Okay.**
 21 Q. -- to get your testimony.
 22 **A. Okay.**
 23 Q. So, are you telling me your response
 24 here on June 17, 1548 -- at 1548 to Plaintiff where
 25 you write "I would consider it but only if it is

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1 done as Isabelle's projects and you would have 100
 2 percent of the return," that is not business-speak?
 3 Is that your testimony?
 4 **A. Oh, no. That's certainly**
 5 **business-speak.**
 6 Q. So you did speak business before she
 7 transferred you funds; is that now your testimony?
 8 **A. We did not discuss. I made her a -- a**
 9 **declarative. I did not get a response to the**
 10 **affirmative, let's do this. She said, "No. No**
 11 **strings attached."**
 12 Q. Okay. Before you said you didn't talk
 13 about any business or investment before she
 14 transferred money.
 15 You remember that?
 16 **A. Yeah.**
 17 Q. Does this change your mind about that?
 18 **A. It's --**
 19 Q. Does this not -- email say you did talk
 20 about business and investment before she transferred
 21 the money?
 22 **A. When you --**
 23 Q. Just yes or no?
 24 **A. No.**
 25 Q. Okay.

<p style="text-align: right;">153</p> <p>1 A. And do you know why? 2 Q. Tell us. 3 A. Okay. Because when you talk about 4 business, it's a two-way street. 5 Do you see a response to what I wrote? 6 So we didn't have a discussion. I wrote 7 an email. There was no response. 8 Q. Okay. So let's go to the next one. 9 If you turn the page to the first page, 10 you have a response on June 17, 2014 dated 4:00 A.M. 11 from Isabelle Gauthier. Okay? 12 And she writes she doesn't care much 13 about profit or return of investments. Okay? 14 "I love you. That's all. And no, 15 that even if I did not love you the 16 way I do, as your friend I would 17 have offered to contribute 18 something to help one way or 19 another." 20 Okay. Now, do you see up top on 21 June 17th the money was to be used -- let me just go 22 back to what we were just talking about. 23 Do you understand that the money is to 24 be used from her first email here at 5:49 A.M. on 25 page two of three that the money is to be used for</p>	<p style="text-align: right;">155</p> <p>1 have a wonderful talented son on his way to the best 2 of all." 3 Q. What do you understand it to be an 4 investment in? 5 A. Me. 6 Q. Investment in you? 7 A. Yeah. 8 Q. Investment in you for what purpose? 9 A. Investment in me for my creativity, for 10 what I was building. 11 Q. So -- 12 A. She put in wonderful gadgets and tools 13 when we didn't create wonderful gadgets and tools. 14 Everything that had been public, there was nothing 15 to demonstrate one gadget or one tool. We were 16 creating a panorama on the internet. 17 So what she says is "I would like to 18 offer you a humble contribution, if you will." This 19 is right after she says you're building this 20 wonderful thing with Costas and so on and so forth. 21 Q. So here you are, what you're telling me 22 today -- you don't even -- you barely know Plaintiff 23 at this time, correct? 24 A. Correct. 25 Q. You haven't had any -- let's say</p>
<p style="text-align: right;">154</p> <p>1 business purposes? Do you understand that? 2 MR. PARMELEE: Objection. Misstates the 3 document. 4 But you can answer if you understand. 5 THE WITNESS: I'm trying to see where 6 Mr. Wittenberg is referring. 7 BY MR. WITTENBERG: 8 Q. Well, for example, you were launching a 9 new music production company, building all sorts of 10 wonderful gadgets and tools. She always wanted to 11 invest in something worthy. 12 Do you see that it's meant for business 13 purposes? 14 MR. PARMELEE: Again misstates the 15 document. 16 THE WITNESS: It says "invest in 17 something worthy." 18 BY MR. WITTENBERG: 19 Q. Correct. 20 A. So it doesn't say business purposes. 21 Q. Okay. 22 A. She -- 23 Q. So what did you understand -- what did 24 you understand it to be? Invest in what? 25 A. Well, she says earlier -- she says "You</p>	<p style="text-align: right;">156</p> <p>1 intimate correspondence by email at this point? Is 2 that your testimony? 3 A. We're calling ourselves darling and, 4 yeah, there was definitely an attraction there. 5 But when you are going into a specific 6 business arrangement, that's not how it goes. 7 What she mentioned was my music, the 8 things that I was building with my team and my son. 9 That to me is pretty clear that she was investing in 10 me. 11 Q. Then your response doesn't say "Thank 12 you for investing in me." It says "Only if it is 13 done in Isabelle's projects," plural, correct? 14 Projects? 15 And do you see -- 16 A. And she -- affirmative. 17 Q. And she will have 100 percent -- I'm 18 just being clear. 19 You understood it was for business. 20 MR. PARMELEE: Objection. 21 BY MR. WITTENBERG: 22 Q. You're saying you'll have 100 percent 23 return -- 24 A. I don't agree with that. But, 25 Mr. Wittenberg --</p>

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1 Q. Okay.

2 A. -- you don't see a reply from her saying

3 "Okay. I accept these terms."

4 In fact, when I did speak to her, she

5 said "No, no, no. There's no strings attached."

6 And then she wrote it in an email.

7 Q. Okay. So you never insisted that she

8 has 100 percent -- that she has any profits from

9 this thing?

10 A. When she came --

11 Q. Do you remember that or not? Did you

12 ever say "I insist you have the profits" --

13 A. Let me explain, if I could. All right?

14 She said no with this. But when she

15 came down here I pushed on it. I wanted her -- I

16 had had this idea of Oasis for a while. I wanted

17 her to be in charge. I wanted to make it a big

18 company.

19 But this is after funds had been

20 transferred.

21 Q. Do you see the top email here that says

22 "From Thomas Schoenberger"?

23 A. Yes.

24 Q. "And again this is just a thought," 17th

25 of June 2014, and you write back "love you,"

158

1 exclamation point.

2 Did you love her at this time?

3 A. Oh, I just thought the world of her.

4 But it was --

5 Q. Were you in love with Plaintiff at the

6 time?

7 A. I hadn't met her.

8 Q. Okay. But so you were telling her you

9 love her.

10 Why were you doing that?

11 A. Because that's a term of endearment that

12 people use all the time. Love you, you know,

13 kisses. People do happy faces all the time.

14 I felt very warm that she was willing to

15 make a donation. She didn't tell me how much.

16 Q. Nowhere in this email does it say

17 "donation"?

18 A. Contribution.

19 Q. No, no, no. That's a different word.

20 A. Yeah.

21 Q. So, please, nowhere does it say

22 "donation," does it?

23 A. "Humble contribution."

24 Q. Tell us, Mr. Schoenberger, where does it

25 say "donation" in this email chain?

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1 A. It says "humble contribution." I just

2 answered your question.

3 Q. Does it say "donation" anywhere in

4 this --

5 MR. PARMELEE: Objection.

6 BY MR. WITTENBERG:

7 Q. -- document?

8 MR. PARMELEE: The document speaks for

9 itself.

10 MR. WITTENBERG: And your client

11 continues to say it's a donation.

12 BY MR. WITTENBERG:

13 Q. Does it say it? Yes or no?

14 No. Does it say -- does it say the word

15 "gift" anywhere?

16 MR. PARMELEE: Mr. Wittenberg, my client

17 just testified that "humble contribution" is where

18 it says donation. That is his answer to your

19 question.

20 BY MR. WITTENBERG:

21 Q. So your answer is that "humble

22 contribution" means a donation to you personally?

23 MR. PARMELEE: The same way you're

24 characterizing the document to say "investment in

25 business" rather than "investment in you."

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1 BY MR. WITTENBERG:

2 Q. Okay. So you understand,

3 Mr. Schoenberger, that "humble contribution" means a

4 gift to you?

5 That's where you get the idea that it's

6 a gift; is that right?

7 A. Yes.

8 Q. Okay. So, here when you wrote on

9 June 17, 2014 after you tell Plaintiff you love her,

10 "I will be making you a profit, and

11 on that I insist."

12 So right here before she transfers you

13 the money -- and remember, at this time you've

14 presented yourself as a very successful businessman

15 on Facebook, right?

16 A. How.

17 Q. On Facebook?

18 A. I didn't present myself as a successful

19 businessman. As a composer.

20 Q. Okay. Do you remember what your

21 Facebook page looked like?

22 A. Sure.

23 Q. Okay.

24 A. And, Mr. Wittenberg, there's something

25 called LinkedIn where people put their resumes and

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1 **their business history.**
 2 MR. WITTENBERG: Can I mark this as
 3 Exhibit 2, please.
 4 (Whereupon the document referred
 5 to was marked Plaintiff's
 6 Exhibit 2 by the Certified
 7 Shorthand Reporter and is attached
 8 hereto.)
 9 MR. WITTENBERG: Thank you.
 10 BY MR. WITTENBERG:
 11 Q. So you'll see that you and your counsel
 12 can identify this as pages from your Facebook?
 13 MR. PARMELEE: Let me see that.
 14 THE WITNESS: Yeah.
 15 BY MR. WITTENBERG:
 16 Q. Okay.
 17 **A. Prolific composer.**
 18 Q. All I need you to do is take a look at
 19 it and tell us if you remember putting this stuff on
 20 the Web on your Facebook page.
 21 **A. Yeah. It's all true.**
 22 Q. And you can flip through each page.
 23 It's all what you've posted and communications
 24 you've had?
 25 **A. Sure. How does it show me as a**

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1 **successful businessman?**
 2 Q. Okay. Thank you.
 3 I just wanted you to authenticate those
 4 are your Facebook profile.
 5 **A. Oh, yeah.**
 6 Q. Okay.
 7 **A. Mr. Wittenberg, can I ask a question, if**
 8 **I could?**
 9 **When I am saying I'll make a profit,**
 10 **I'll do this, she writes back -- Plaintiff writes**
 11 **back,**
 12 **"Darling, I do not need any credit**
 13 **at all. Contributing money is what**
 14 **I can do."**
 15 **And she puts "money" in quotes.**
 16 **"Nothing compared to what you are**
 17 **creating with Costas, I know that,**
 18 **your team. So no worries there."**
 19 **She also wrote back in another email**
 20 **there are no strings attached.**
 21 **So to me, when there's a -- when there's**
 22 **a bilateral agreement or trilateral, whatever it is**
 23 **with business -- and I will say that Plaintiff told**
 24 **me that she was schooled at the Sorbonne, among**
 25 **other universities -- I would assume that if there**

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1 **was going to be a business arrangement, it would**
 2 **have been written out before and that her and I**
 3 **would have spoken on the phone before money was**
 4 **transferred.**
 5 Q. Okay. You do say, though, here,
 6 "I insist I make you money on this
 7 and then you have more to give
 8 others."
 9 When you said that, did you mean it that
 10 you would make her money on projects?
 11 **A. She did not tell me how much she was**
 12 **going to --**
 13 Q. That's not the -- please. We're going
 14 to be here all day long if you won't answer my
 15 questions.
 16 **A. I'm trying to.**
 17 Q. When you wrote this did you intend that
 18 you were going to make her money with the money she
 19 gave you?
 20 **A. I offered that, and she refused.**
 21 Q. That's -- when I ask you if that was
 22 your intention, do you understand what that means?
 23 Because I'll ask it a different way if
 24 you don't.
 25 You're not answering my questions.

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1 When you wrote "I insist I make you
 2 money on this," did you intend to state to Plaintiff
 3 that it is an investment deal that she will make
 4 money on?
 5 MR. PARMELEE: Objection. Vague and
 6 ambiguous as to "investment deal."
 7 You can answer the question.
 8 THE WITNESS: Yeah. I wanted to build a
 9 big company with her so --
 10 BY MR. WITTENBERG:
 11 Q. Did you intend to tell her that she will
 12 make money off the money she gave you? Yes or no?
 13 **A. Let me try to answer this --**
 14 Q. I don't need you to. It's a "yes" or
 15 "no" question.
 16 You wrote the words. I'm asking whether
 17 you intended it to mean she'll make money off the
 18 money she gives you. Yes or no?
 19 **A. I intended to build a company that would**
 20 **be large, and I wanted her in charge of it.**
 21 **Was it specifically this money? No. It**
 22 **had -- it had to do with everything that I was doing**
 23 **in my life.**
 24 Q. You don't write that here, though,
 25 right?

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1 You don't dissuade her of the idea that
2 this money's not going to go toward making money for
3 Plaintiff.
4 Did you ever tell her "I'm going to use
5 this money for gambling purposes"?

6 **A. She went with me gambling.**
7 Q. Did you ever write that?
8 **A. Did I ever write this? No.**
9 Q. Did you ever tell her in an email "The
10 money you're giving me I'm going to use for gambling
11 purposes"?

12 **A. No.**
13 Q. Did you ever tell her you're going to
14 use that money to pay back all of your bad debts?

15 **A. Yes.**
16 Q. Okay. When did you tell her that?
17 **A. First four days, five days.**
18 Q. Well after she transferred the money to
19 you?

20 **A. We had a conversation on the phone on
21 either the 20th or the 21st where I told her "You've
22 saved my life. This is everything that is going
23 on."**
24 **So she knew a fair amount. I said "It's
25 gotten serious."**

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1 Q. Okay. So, just a last question here,
2 and we'll see where we go.
3 If you look at the language in her email
4 that says she has money waiting to be invested in a
5 vase, did you understand she's offering you money to
6 invest in a business?

7 **A. I understood that she was investing in
8 me.**
9 **I had started to feel very attracted to
10 her, and I had hoped that we would be together. But
11 the investment was pretty clear since she mentioned
12 myself, the team people that I put together with
13 YouTube and also my son, that it was an investment
14 in me.**
15 Q. So where she writes in her sentence "I
16 would like to offer you this draft so that you can
17 use it," did you not expect that to be using it in
18 business?

19 Are you saying you didn't think that had
20 any connection to business?

21 **A. Mr. Wittenberg, I don't even know if I'm
22 supposed to say this, but there's communications
23 that you haven't seen.**
24 Q. Why is that?
25 **A. Because you haven't asked for them.**

167

1 Q. Okay. Can you tell me what they are?
2 **A. Facebook communications where Isabella
3 clearly says "no strings attached."**
4 Q. Okay. Are you telling me you haven't
5 produced those in that case?
6 **A. You haven't asked for them. They've
7 been with legal counsel for a while.**
8 MR. PARMELEE: I think that misstates
9 the factual situation, but --
10 THE WITNESS: Sorry.
11 BY MR. WITTENBERG:
12 Q. Why do you think they weren't produced?
13 **A. I've given everything. I know that when
14 we first got the lawsuit I had thought that I had
15 sent them over via email in one thing, and I had --
16 I had made a mistake.**
17 **But we -- we have those. And in those
18 emails there is a pretty clear trend to the point
19 where she says no strings attached.**
20 Q. Okay.
21 MR. PARMELEE: When you're done with the
22 line of questioning can we take a short break?
23 MR. WITTENBERG: We just started. And I
24 really want to try and keep us moving, if that's all
25 right.

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1 I know this is a tricky part of the
2 deposition for your client. If we can just go
3 another 20 minutes, I appreciate it.
4 BY MR. WITTENBERG:
5 Q. So, it's your testimony that you offered
6 her 100 percent of the return of the money she was
7 going to transfer to you, but she rejected your
8 offer; is that right?
9 **A. She -- it wasn't 100 percent return on
10 the money. It was 100 percent return on a project
11 where there would be a company -- a company that
12 would be built out where she would be in charge that
13 I would build a board of directors. And it would be
14 a company that Brian Weiner was going to build out
15 the website.**
16 **Now, my idea for a long time with Oasis,
17 which predates me even knowing Isabella, was as a
18 music library. I have people that I discussed it
19 with prior to 2014.**
20 Q. What does the word "return" mean to you
21 as you're using it here?
22 **A. Return would be worth of a company, a
23 company --**
24 Q. Money, right?
25 **A. Well --**

169

1 Q. Not money?

2 A. Value.

3 Q. Money or not money?

4 A. It's value.

5 Q. Okay. So a return is money stated in

6 value, right?

7 A. A return is value.

8 Q. Are you saying value is not money,

9 Mr. Schoenberger?

10 A. You know, Amazon had a net worth of so

11 much when they didn't make a profit.

12 What I'm trying to say is value is

13 value. You can think of it --

14 Q. Value is in terms of money.

15 So when you say she's going to have

16 100 percent of return, you mean the value of the

17 company that you're going to build with her money,

18 right?

19 A. Valuation is not -- value is not always

20 money. Value can turn into money down the road. If

21 you --

22 Q. I'm asking how you meant it here, just

23 right here, Mr. Schoenberger.

24 A. I was talking about value.

25 Q. I was saying return of what?

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1 100 percent return of what?

2 What was in your mind?

3 A. Let me finish. Isabella had an idea of

4 having some sort of network where -- I'm sorry.

5 Plaintiff had an idea where -- where there would be

6 a -- a network of poets, of artists, of creative

7 people.

8 What I approached her on -- this is

9 after she had transferred the money -- I said, well,

10 you know, I would like to see if there can be

11 something that can add value, because if you simply

12 have" --

13 Q. Okay. Thank you for that long

14 digression.

15 Okay?

16 A. Okay.

17 Q. Mr. Schoenberger, do you know what you

18 meant when you said you would have 100 percent of

19 the return?

20 Do you know what you meant? Yes or no?

21 A. Yes.

22 Q. Okay. 100 percent, that's the whole

23 thing, correct?

24 A. Yeah.

25 Q. And return means a return of money based

171

1 on the money you give me, right?

2 A. Or value.

3 Q. Okay. Value is what?

4 Is value something in the air or is

5 value in terms of money?

6 Why are you so hesitant to say value --

7 that you were promising her 100 percent return of

8 money from a business? Why are you so hesitant to

9 say that?

10 A. Because it's -- it's a different thing

11 to say "I'll build you a company."

12 Q. I'm asking what did you -- you're

13 dancing around this issue about what it means.

14 Are you saying you were going to give

15 her 100 percent return of you because she's giving

16 you the money, invest in you, or are you saying

17 you're going to give her 100 percent return of a

18 business that has value because you're going to use

19 her money in business?

20 A. Wrong.

21 Q. Okay.

22 A. She had made a donation. I had planned

23 to make sure that I was going to donate to her back

24 through building a company that would have at least

25 that valuation. I wanted to build her a three to

172

1 four to five million dollar company.

2 Q. So in your mind when she says "invest,"

3 she means donate, right? Yes or no?

4 A. I didn't even think about it. She could

5 mean anything.

6 Q. When she said invest, you said --

7 contribute money and invest, you think that means

8 donate, correct?

9 A. Contribute, yeah.

10 Q. Okay. And when you say you're going to

11 have 100 percent of return, you mean nothing at all?

12 That's what you're telling us right now,

13 right?

14 A. No. I meant that I wanted to build a

15 company. What she said is "I would like to offer

16 you a humble contribution."

17 Those are not the words of "I've got a

18 business proposal. Let's do it this way."

19 So here she was giving, and here I was

20 saying "I want to build a company, you can have

21 100 percent return."

22 When I met with her I said, "Let's build

23 this thing. It can go 100 times. Seriously."

24 Q. When you said she could have 100 percent

25 of return, was that true when you wrote it? Did you

173

1 mean it?

2 **A. Yeah.**

3 Q. Okay.

4 **A. She rejected it.**

5 **Do you see a reply from her,**

6 **Mr. Wittenberg? Sir?**

7 Q. So, when she transferred you the money,

8 prior to that you say you're going to -- and

9 throughout this other one, you're going to give her

10 profits and you insist that you're going to make her

11 money, right?

12 MR. PARMELEE: Objection. Misstates the

13 document.

14 BY MR. WITTENBERG:

15 Q. You can look at it. It says "I'm going

16 to make you a profit."

17 And this was before the money was

18 transferred, right?

19 **A. June 17th I think it was transferred,**

20 **and it took two days to hit my account.**

21 Q. Okay. You think, right?

22 **A. Yeah. I'm not sure.**

23 Q. But you don't know?

24 **A. I don't.**

25 Q. You're guessing?

174

1 **A. Do you know?**

2 Q. Yes.

3 **A. Okay.**

4 Q. This was before the money as

5 transferred.

6 **A. Okay.**

7 Q. And you told her "I'll be making you a

8 profit on that. I insist."

9 Did you mean that when you said it? Was

10 it true?

11 **A. Yes. But I didn't know what she was**

12 **putting in, Mr. Wittenberg.**

13 Q. Now, you go on to say,

14 "I insist I make you money."

15 Did you mean that when you told

16 Plaintiff that, "I will make you money"?

17 **A. Yes.**

18 Q. Okay.

19 **A. Did I know the amount?**

20 Q. Okay.

21 **A. It could have been \$500. I had no idea.**

22 Q. Let's move on to -- just a last -- when

23 you said "I insist on make you money," you were

24 going to invest the money in business; is that

25 right?

175

1 **A. Yes. But --**

2 Q. Okay. That's fine.

3 **A. I just wanted to say one thing. I had**

4 **no idea what she was going putting in. I could have**

5 **been \$100. It could have been \$500. I had no idea**

6 **of the amount. She had never told me.**

7 Q. Thank you very much.

8 All right. Let's just mark this as

9 Exhibit 3.

10 (Whereupon the document referred

11 to was marked Plaintiff's

12 Exhibit 3 by the Certified

13 Shorthand Reporter and is attached

14 hereto.)

15 THE WITNESS: Thank you.

16 BY MR. WITTENBERG:

17 Q. Okay. You can look through these. I

18 think you'll find that these have the Bates stamp

19 TS 0054 all the way through TS 0016 -- I'm sorry --

20 0164.

21 These are your bank statements. If you

22 flip through them, Mr. Schoenberger, will you tell

23 us if these are, in fact, your bank statements?

24 **A. Yes.**

25 Q. And you see on the even page 54 here,

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1 TS 54, you have Thomas Schoenberger, dba North Bay

2 Entertainment, right?

3 **A. Yes.**

4 Q. And this is the company that you say you

5 no longer had anything to do with as of 2008, right?

6 **A. Yes.**

7 Q. Okay.

8 **A. No. Actually, North Bay Entertainment**

9 **Concord was a different business that was taken by**

10 **the people who had burned me.**

11 Q. But are you still operating North Bay

12 Entertainment on January 1, 2014 as of the date of

13 this statement?

14 **A. No. But I kept the -- I've kept the**

15 **name.**

16 Q. Did you use the name in business?

17 **A. I plan to.**

18 Q. Did you at the time, Mr. Schoenberger?

19 **A. No.**

20 Q. Let's go to page 91. Well, I think we

21 can start with 87.

22 And you see this is a statement from

23 Wells Fargo, June 1 through June 30.

24 Do you see that at the top of page 87?

25 **A. I can't find what page. Oh, 91. All**

177

1 **right. Yep.**
 2 Q. You see the balance, it says in activity
 3 summary balance, balance -- beginning balance on
 4 June 1, \$175.24?
 5 **A. On page 87?**
 6 Q. TS 0087.
 7 **A. Oh, \$175.24, yeah.**
 8 Q. And that was the only bank account you
 9 had in the world at this time besides your son's,
 10 right?
 11 **A. Yeah.**
 12 Q. And all you had in terms of money you
 13 had was \$175.24.
 14 Did you have money anywhere else besides
 15 this account?
 16 **A. No.**
 17 Q. Okay. So, if you turn to page 91,
 18 you'll see there's an entry on date 6/23.
 19 **A. Uh-huh.**
 20 Q. That there was a description of \$300,000
 21 Euros wired into your account. You see a deposit
 22 for \$397,800.
 23 **A. Yeah.**
 24 Q. So you confirmed that you received that
 25 wire from, and you see how it says Isabelle

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1 Gauthier --
 2 **A. Yeah.**
 3 Q. -- on June 23rd into your Wells Fargo
 4 account. Right?
 5 **A. Yes.**
 6 Q. Okay. We'll come back to that one, but
 7 you can put aside for now, that exhibit.
 8 The -- what did you tell Isabelle you
 9 were going to do with the money at the time it was
 10 transferred before or right after?
 11 Not months later or weeks later.
 12 What did you tell her you were going to
 13 do with the money?
 14 **A. I told her that she had helped to save**
 15 **my life. I told her I had demons to fight. I told**
 16 **her that I was dealing with some very personal**
 17 **matters that were -- that had basically put me into**
 18 **a debt situation.**
 19 **She said "I'm so happy that I can help."**
 20 **And I kept on saying how can I show my**
 21 **gratitude again and again.**
 22 Q. The only thing I didn't hear you say is
 23 did you tell her you were going to use the money in
 24 business, for business purposes?
 25 **A. I told her let's start.**

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1 Q. Did you tell her that you were going to
 2 use her money for business purposes? Yes or no?
 3 **A. I asked her "Can we start something?**
 4 **Can we do something?"**
 5 Q. So your answer is no, you never told her
 6 that you were going to use the money for business
 7 purposes? Is that correct?
 8 **A. I don't recall what I said to her on the**
 9 **phone, but if I --**
 10 Q. No, no, no.
 11 **A. Mr. Wittenberg, I'm trying to do my best**
 12 **to answer --**
 13 Q. I know. Let's go slower.
 14 **A. Okay.**
 15 Q. Because I think that there's -- I won't
 16 characterize it, but let's go slower.
 17 **A. Okay.**
 18 Q. Around the time the money came to you,
 19 was transferred from Plaintiff to you, did you tell
 20 her what you intended to do with the money? Yes or
 21 no?
 22 **A. In conversations, yes.**
 23 Q. Okay. Did you tell her you planned to
 24 use it for business purposes? Yes or no?
 25 **A. Yes. I told her I was building out the**

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1 **business.**
 2 MR. WITTENBERG: Okay. Let me mark this
 3 as Exhibit 4, please.
 4 (Whereupon the document referred
 5 to was marked Plaintiff's
 6 Exhibit 4 by the Certified
 7 Shorthand Reporter and is attached
 8 hereto.)
 9 THE WITNESS: Thank you.
 10 BY MR. WITTENBERG:
 11 Q. Now, again we'll start at the bottom and
 12 work our way up.
 13 **A. Okay.**
 14 Q. Okay. At the very bottom on June 29,
 15 2014, 1428, you write to Plaintiff that,
 16 "As you were considering Oasis at
 17 the time I was doing Sophia Musik."
 18 Right?
 19 **A. Yes.**
 20 Q. So clearly there were discussions you
 21 had with Plaintiff about this business concept of
 22 Oasis; is that right?
 23 **A. I had given her the name "Oasis." She**
 24 **did not have a name for what she was doing.**
 25 Q. I didn't ask you who picked the name.

<p style="text-align: right;">181</p> <p>1 A. Okay. 2 Q. You were discussing the business concept 3 called Oasis, correct? 4 A. Yeah. 5 Q. Okay. Now, you're talking about Oasis 6 coming under the umbrella of Sophia Musik. 7 I'm sorry. You say that, 8 "This is the concept of Sophia 9 Musik. It can be under the 10 umbrella of Oasis." 11 What did you mean by that? 12 A. Oasis has been -- it was a concept that 13 I came up with. It was going to be a musical 14 library. 15 I discussed it with a number of people 16 prior, that it was created in December of 2012. 17 When I started talking with Isabella, 18 she told me that she wanted a network of artists. 19 And I said "Like a Oasis?" 20 We had two or three -- 21 Q. And this was before the money was 22 transferred? 23 A. No. It was after. 24 Q. It was after? 25 A. It was within that week. This is the</p>	<p style="text-align: right;">183</p> <p>1 being built with the money she transferred to you, 2 correct? 3 A. No. I did not say that. I never said 4 it's going to come from the Monday directly from the 5 money that you transferred. 6 Q. Okay. Well, how were you intending 7 to -- what money were you intending to use to do 8 these concepts here? 9 A. I was going to go ahead and take the 10 collateral of talent that I know in Hollywood and 11 create a production company. I was attempting -- 12 Q. With the money that she transferred to 13 you, right? Is that the idea or no? 14 A. No. I was attempting to raise 15 \$50 million. Yeah. 16 Q. When were you attempting to raised 17 \$50 million? 18 A. From -- 19 Q. Was it at the time that money was 20 transferred to you from Plaintiff? 21 A. It was after that. It would have been 22 from July into August. And I was attempting -- and 23 Plaintiff knew -- knew about it, too. We were 24 dealing with a gentleman who ended up being 25 unscrupulous and went to jail.</p>
<p style="text-align: right;">182</p> <p>1 29th. I think that we spoke a day or two after the 2 monies came. 3 Q. Okay. 4 A. Yeah. 5 Q. So you're talking about business 6 concepts a day or two after the money's transferred, 7 right? 8 A. Oh, I was so excited. I kept on saying, 9 "What can I do?" 10 And she kept on saying "Nothing. I just 11 wanted to help." 12 And I said "I have an idea." 13 But the money had been transferred. 14 Q. Okay. So, as we go on, you are talking 15 about Sophia Musik, which is a business of yours, 16 right? 17 A. Yes. 18 Q. That's what you describe as your music 19 production company, right? 20 A. Yes. 21 Q. And you were telling Isabella, the 22 Plaintiff, that the music production company would 23 come under the umbrella of Oasis; is that right? 24 A. That's what I wanted. 25 Q. Meaning it would be a business that was</p>	<p style="text-align: right;">184</p> <p>1 Q. Let's move on to what you're saying 2 here. 3 And you go up and you see on June 29th, 4 2014 at 7:04 A.M., Plaintiff responds to you, 5 "Like watching your dream 6 materialize, everything I like, 7 everything just there, oh, baby, 8 you have done an amazing job. Wow, 9 I love it. Thomas, baby, I love 10 you." 11 Okay. Clearly you understood that 12 Plaintiff trusted you, correct? 13 A. Do you understand what her response was 14 for, Mr. Wittenberg? 15 It was because of a song. And as you 16 can see, it says on page two, "persevere." I had 17 written her a piece of music. 18 Q. Okay. So you don't think she's 19 responding to you saying "As you're considering 20 Oasis, we're going to do Sophia Musik under the same 21 umbrella as Oasis"? 22 A. I didn't think she even read the 23 material. She said, 24 "Like watching a dream materialize, 25 everything I like, everything just</p>

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1 **there. Oh, baby, you have done an**
 2 **amazing job. Wow."**
 3 **She was responding to the content of the**
 4 **video that I was working on.**
 5 Q. Okay. Then when you respond -- and of
 6 course we'll let Plaintiff testify to her own mind
 7 set --
 8 **A. Sure.**
 9 Q. -- at a later date. Right?
 10 **A. Yeah.**
 11 Q. You write on June 29th,
 12 "I love you too. Warren Zide is a
 13 huge producer of films. Right?
 14 And he's a gentleman that you said
 15 was a witness to some of these
 16 events."
 17 Right?
 18 **A. Yeah.**
 19 Q. Is he still a witness to some of these
 20 events?
 21 **A. To which events?**
 22 Q. Any events related to this transfer of
 23 money or lawsuit?
 24 **A. Oh, no. He's not a witness to the**
 25 **transfer of money. He's not witness to the lawsuit.**

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1 **We took a couple dinners with -- with him, and the**
 2 **whole idea there was to get him on the board of**
 3 **directors for Oasis.**
 4 Q. Okay. Did you -- do you have emails
 5 with Warren Zide?
 6 **A. They're destroyed. I got hacked.**
 7 Q. You don't have a single -- any email
 8 from anywhere from a Warren Zide?
 9 **A. No.**
 10 Q. Okay. Do you have any -- now, you said
 11 say here in your same email,
 12 "Money is a vehicle. I have Dubai
 13 and London being set up."
 14 What did you mean by "I have Dubai and
 15 London set up"?
 16 **A. When I had North Bay Entertainment I had**
 17 **built cell offices which were usually run by one**
 18 **musician, and then we would -- back in the old days**
 19 **we would basically say we have a Marin office, we**
 20 **have a San Francisco office, so on and so forth. So**
 21 **it was common there.**
 22 **What I wanted to do, and the Plaintiff**
 23 **knew, was to get a Dubai number and have someone**
 24 **there. I had made some contacts when I was over**
 25 **there.**

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1 **As far as London I had some contacts**
 2 **there.**
 3 **And the whole idea was at that time to**
 4 **create a cyber salon.**
 5 Q. Okay. So you say "I have Dubai and
 6 London being set up."
 7 **A. Yeah.**
 8 Q. Is that true when you wrote it?
 9 **A. I had written with Dubai --**
 10 Q. Who in Dubai? Give me a name.
 11 **A. A guy named Saleem Al Olemear. But he**
 12 **was not around --**
 13 Q. Where are the emails?
 14 You said you were writing. Where are
 15 the emails?
 16 **A. All my emails were destroyed in May of**
 17 **2015. I had what was called a RAT hack, which is a**
 18 **remote access tool hack, which basically wiped it**
 19 **out.**
 20 **I used one -- it destroyed my laptop.**
 21 Q. Do you have any other writings, faxes,
 22 text messages with anybody regarding Dubai that you
 23 set up?
 24 **A. I don't. You know what, what we might**
 25 **have is copies of the itinerary from December 2012**

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1 **to Dubai. And I can look for that. I'll try to**
 2 **find that.**
 3 Q. What about London? Did you have any
 4 writings about setting anything up in London?
 5 **A. I had emails that are now gone.**
 6 Q. Now gone.
 7 Text messages?
 8 **A. No texts, no. I don't --**
 9 Q. Do you use any other -- Skype?
 10 **A. I've never used Skype.**
 11 Q. Do you ever used UZAP?
 12 **A. I have never used that.**
 13 Q. Do you have the name of a person in
 14 London who was setting it up for you?
 15 **A. No. What I was doing is I was looking a**
 16 **number there, which would be 404 and then looking**
 17 **through online ads saying does someone want to have**
 18 **a cyber office.**
 19 Q. Now, you're telling me her that you were
 20 doing this stuff because of the money she
 21 transferred to you, correct?
 22 **A. No.**
 23 Q. There's no relation in your mind to
 24 having Warren Zide and setting up Dubai and London,
 25 money is a vehicle, no relation at all?

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1 **A. With Warren Zide, yes, but --**
 2 Q. Hold on. No relation to Plaintiff's
 3 transfer of the money to you?
 4 MR. PARMELEE: Objection. Compound
 5 question.
 6 You can answer.
 7 THE WITNESS: With Warren Zide, yes.
 8 But to have phone numbers in Dubai, to have a
 9 presence in Dubai, to have a presence in London, I
 10 was thinking Paris, too.
 11 I was thinking in -- in the internet,
 12 Mr. Wittenberg, you can go ahead and you can find
 13 people who solely arrive in this --
 14 BY MR. WITTENBERG:
 15 Q. It all relates to money that was
 16 transferred to you by Plaintiff, correct?
 17 **A. No.**
 18 Q. Okay. And we go on and you can tell us,
 19 what does it relate to?
 20 You have Dubai and London being set up.
 21 Money is a vehicle.
 22 Why are you saying this to Plaintiff?
 23 **A. Okay. I'm going to read through it.**
 24 **Let me -- "I love you too." I said -- she was**
 25 **calling -- she was saying "I love you."**

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1 **"I have Dubai and London being set up."**
 2 **That's where I was exploring. Then we have the**
 3 **master company Oasis. This was what I wanted to do.**
 4 **She had given me the money, but this is what I**
 5 **wanted to do.**
 6 **All right?**
 7 Q. You see how you say,
 8 "Then we have the master company
 9 Oasis with you as principal."
 10 Do you see that?
 11 **A. Yeah.**
 12 Q. What did you mean by "you as principal"?
 13 **A. Her as the principal of Oasis. She**
 14 **rejected these --**
 15 Q. What does "principal" mean?
 16 **A. Principal would be the director, would**
 17 **be the head. But --**
 18 Q. It would be the owner, right?
 19 **A. Not necessarily owner.**
 20 Q. Principal versus an agent?
 21 I mean you know the word. I believe you
 22 spelled it correctly.
 23 **A. Uh-huh.**
 24 Q. Did you know -- have a meeting that that
 25 would mean the owners of the business?

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1 **A. If you look at Gibson, Dunn and**
 2 **Crutcher, they have multiple principals.**
 3 Q. So, what about,
 4 "An advisory board that includes
 5 the former director of the
 6 International Bank of Dubai"?
 7 Who were you referring to there?
 8 **A. The gentleman that I know who I could**
 9 **not get ahold of, and that person -- I never**
 10 **approached him on this, because in the summer in**
 11 **Dubai it's 140 degrees.**
 12 **But I want to get back to something**
 13 **here.**
 14 Q. Hold on. Hold on. Is there a name of a
 15 guy you can give us that was a former director of
 16 International Bank in Dubai?
 17 **A. Sheikh Salim.**
 18 Q. Did you have contact with Sheikh Salim
 19 at any time in your life?
 20 **A. Yeah. Brian went over there --**
 21 Q. Hold on.
 22 Did you have contact? Not Brian.
 23 **A. Oh, concerning this, no.**
 24 Q. Did you ever email Sheikh -- what was
 25 his name?

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1 **A. Sheikh Salim.**
 2 Q. Did you ever email Sheikh Salim?
 3 **A. About this?**
 4 Q. About any of this?
 5 **A. Yeah.**
 6 Q. Do you have any email that show you
 7 emailed --
 8 **A. That's what's destroyed.**
 9 Q. Okay. What about the leading educators?
 10 Who were you referring to here, the leading
 11 educators that were going to be part of Oasis, where
 12 Plaintiff was going to be the principal?
 13 **A. I was saying we can go procure leading**
 14 **educators, powerful visionaries and the like. I**
 15 **wasn't naming any specific people.**
 16 Q. So "we" means you and Plaintiff when you
 17 write "when we have the master company," that's you
 18 and the Plaintiff, right?
 19 **A. This is what I wanted.**
 20 Q. Hold on a minute. I know what you
 21 wanted. But we're going to have continue this
 22 deposition because you're not really answering the
 23 questions.
 24 The "we" here is you and Plaintiff, that
 25 we're going to have a master company Oasis; is that

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1 right?

2 **A. This is what I proposed that was**

3 **rejected.**

4 Q. Was it anybody besides you and

5 Plaintiff?

6 **A. Yes.**

7 Q. Okay. Who else is "We"?

8 **A. There was going to be a board of**

9 **directors.**

10 Q. When you say "we have the master company

11 of Oasis with you as principal," that's -- the "we"

12 is you and Plaintiff, right?

13 **A. Uh-huh.**

14 Q. You and Plaintiff have the master

15 company, right?

16 **A. Yeah.**

17 Q. Okay. And you were setting that up,

18 right?

19 And you got Warren Zide -- you're

20 telling her you got Warren Zide who is now in your

21 fold; is that right?

22 **A. I want to be really clear, and I'm not**

23 **trying to frustrate you, Mr. Wittenberg. What I'm**

24 **saying is when I say "we have the company Oasis,"**

25 **I'm not saying Plaintiff and I, we. If you look at**

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1 **the way that it's written, "we have it" as in we**

2 **have three computers on the desk.**

3 Q. Okay. Let's focus you in on when you

4 say "We have Warren Zide in our fold."

5 What did you mean you have him in your

6 fold now? What did you mean by "fold"?

7 **A. By the fold I said I had spoken to him**

8 **and that he would be very good as board -- being on**

9 **the board of directors.**

10 **I had wanted to take this company,**

11 **Oasis --**

12 Q. So, Mr. Zide told you he agreed to being

13 on the board of Oasis? Is that what you're

14 testimony is?

15 **A. He said "Come on by. Let's have dinner.**

16 **I have no problem with this. Sounds good."**

17 Q. Did you go by and have dinner with

18 Mr. Zide?

19 **A. Yes.**

20 Q. And when was that?

21 **A. I think Plaintiff could probably get the**

22 **actual date.**

23 Q. I'm asking you.

24 Do you know or do you not know?

25 **A. I don't have an approximate date, but**

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1 **second week of August.**

2 Q. Okay. Had anybody else agreed to be on

3 the board of this master company Oasis?

4 **A. No.**

5 Q. Okay. So at that point it was just you,

6 Plaintiff as principal, and Mr. Zide you're telling

7 us was on the advisory board at that time?

8 **A. I had wanted Mr. Weiner, but Plaintiff**

9 **did not want him.**

10 Q. Okay. But you agree with what I just

11 said before you went down your own path about

12 Mr. Weiner?

13 **A. Can you please rephrase --**

14 Q. Yes. I need you -- I know I'm saying

15 things that you agree with. But if you don't say

16 "yes, that's correct," I can't get it on the record.

17 **A. Okay.**

18 Q. So I know you may be taking it a step

19 further to tell us something, but it means I have to

20 go over it all again and you get frustrated and I

21 get frustrated.

22 So, is it correct that on June 29th when

23 you wrote this email the only three people that you

24 had involved with the master company Oasis was you,

25 Plaintiff as principal, and Mr. Zide as an advisory

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1 board member?

2 **A. Yes.**

3 Q. Okay. And at that time nobody else was

4 involved with Oasis?

5 **A. No.**

6 Q. Okay. You go on to say,

7 "I have been taking the funds to

8 create, not splurge."

9 What did you mean by that?

10 To create business, I assume; is that

11 correct.

12 **A. Create music, create what I do. It**

13 **doesn't say create business.**

14 Q. What does "splurge" mean, you're not

15 splurging. What does that mean?

16 **A. She was going to come out and she**

17 **said -- Plaintiff said "Let's ditch the bling."**

18 **That was her quote.**

19 **So I said "Okay, great." I had had the**

20 **impression that she had been a five and six star**

21 **person all the way, but then I had written this**

22 **thing to say -- to say I'm creating.**

23 **And it goes in kind of with what the --**

24 **this is a link to a YouTube video. So what I was**

25 **doing was I was putting a lot of money into the**

<p style="text-align: right;">197</p> <p>1 creation of music, the creation of videos, the 2 production of videos, the viralization of it. 3 Q. So, again, I'm trying to get you 4 focused. Because I think -- 5 A. I'm pretty focused. I don't want to 6 frustrate you, sir. 7 Q. You're evading the questions and you're 8 going down a lot of -- a story that -- 9 MR. PARMELEE: Objection. Misstates the 10 testimony on the record. 11 THE WITNESS: I'm not trying to evade 12 it. 13 BY MR. WITTENBERG: 14 Q. Ill go -- you say, 15 "When you get down here we need to 16 meet with an attorney who can set 17 it up. Oasis will be yours." 18 So again, is it correct that you're 19 telling her that this company that you're starting 20 with her money is going to be hers on June 29th? 21 MR. PARMELEE: Objection. 22 Argumentative. 23 THE WITNESS: You can't -- 24 BY MR. WITTENBERG: 25 Q. What are you telling her there then?</p>	<p style="text-align: right;">199</p> <p>1 been very commercially viable. 2 Q. So you go on to say, 3 "This will make you more money." 4 You intended to make her more money. 5 That was what you both intended, isn't it? 6 I mean it's in writing. And again, I 7 don't want to have to interpret it for you. I'm 8 giving you a chance. 9 "This will make you more money," right? 10 A. But you just -- you say "this is what 11 you both intended." 12 Q. Did you not intend that? I'm asking you 13 to tell me. 14 A. Well, you said both of us, including 15 Plaintiff. And -- 16 Q. Okay. 17 A. -- you have to understand that when I 18 was talking with her she was not talking about 19 money. She didn't want to talk about money. She 20 didn't like money. 21 Q. But you always kept telling her it was 22 her company and you were going to make her money. 23 That's where you came from? 24 A. I continually tried to get her to go to 25 business meetings and to build things out.</p>
<p style="text-align: right;">198</p> <p>1 A. There is never any statement that it is 2 with her money. 3 Q. I'm asking what you're telling her here. 4 We're giving you an opportunity. I'm 5 going to ask you over and over again until you tell 6 us, what did you mean "Oasis will be yours"? 7 A. Let me read it so I can answer you 8 succinctly, sir. 9 Absolutely, Oasis would be hers and she 10 would be the owner of it. 11 Q. Okay. And you go on in the next 12 sentence, 13 "If you are a wealthy lady now, 14 save your money. This will make 15 you more money." 16 So you're telling her that she's going 17 to make more money with the business you're doing 18 with Oasis; is that right? Is that a fair 19 understanding of what you're writing? 20 A. If I'm naming her as principal and I am 21 saying "Oasis is yours" and I'm going through the 22 motions of building it up, yes, I wanted her to be 23 enormously wealthy. 24 I believe the idea for Oasis, which was 25 different from what my original deal, could have</p>	<p style="text-align: right;">200</p> <p>1 Q. Okay. And then you say here, 2 "I always give back tenfold." 3 What did you mean by that? 4 A. She told me that she loved me and she 5 had been rejected by someone. 6 And I said when it comes to money and 7 when it comes to anything else, you've been so 8 generous to me I want to be ten times more generous 9 to her. 10 Q. Well, you say "I always give back 11 tenfold." 12 A. Yeah. 13 Q. When have you given back tenfold? 14 A. Your Plaintiff ended up talking to the 15 person who was structuring -- you wanted an answer. 16 Q. That's a digression. 17 A. But -- 18 Q. What is the time period? When have you 19 ever given somebody back tenfold? 20 MR. PARMELEE: Objection. Relevance, 21 vague and ambiguous. 22 THE WITNESS: Excuse me. I need to use 23 the restroom one more time. 24 BY MR. WITTENBERG: 25 Q. Mr. Schoenberger --</p>

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1 **A. Yes.**
 2 Q. -- these are the words that you used,
 3 and they're all in the context of a master company
 4 called Oasis and making her more money on her money.
 5 And I'm asking you, is there ever a time
 6 period when you gave anybody back tenfold of what
 7 they gave you?
 8 MR. PARMELEE: My objection stands.
 9 THE WITNESS: And so within this email
 10 it starts out "I love you too, Isa," and then the
 11 final sentence "I want to know who this person is,
 12 not their last name, but what they can do and why
 13 this person is intent upon hurting the girl that I
 14 love."
 15 I was attempting repeatedly to get her
 16 to build out a business -- Plaintiff, to get
 17 Plaintiff to build out a business with me, because
 18 that's what I wanted. And, you know, it didn't
 19 happen.
 20 I'm not the one who put a knife into the
 21 heart of the business idea. I did not call anybody
 22 in her life and say "you're a fraud."
 23 She did call a person through the
 24 website --
 25 Q. You're on a very nice monologue here,

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1 which I think is, you know, something you're intent
 2 on saying over and over.
 3 But we're avoiding the one question I've
 4 asked you, which is have you ever given somebody
 5 back tenfold.
 6 And let's start with the word "tenfold."
 7 Does that mean ten times? You're giving
 8 somebody back ten times what they give you? Is that
 9 what "tenfold" would be?
 10 **A. Tenfold love, tenfold -- yes. Of**
 11 **course.**
 12 Q. Okay.
 13 **A. It's an expression.**
 14 Q. And it comes right after "This will make
 15 you more money. I always give back tenfold."
 16 So you're promising her a return or her
 17 money again, aren't you?
 18 MR. PARMELEE: Objection. Vague and
 19 ambiguous as to --
 20 THE WITNESS: I'm going to use the
 21 restroom one more time.
 22 MR. PARMELEE: You're supposed to answer
 23 the question. There's a question pending.
 24 I didn't direct you not to answer, so
 25 you're still under an obligation to answer the

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1 question that's pending.
 2 THE WITNESS: Okay.
 3 MR. WITTENBERG: Thank you very much,
 4 Mr. Parmelee. If you need to run out as you just
 5 did --
 6 THE WITNESS: Oh, I don't want to run
 7 out. I don't want to be evasive either.
 8 MR. WITTENBERG: Okay. Go to the
 9 bathroom and we'll wait for you.
 10 THE WITNESS: Okay. Thank you.
 11 MR. WITTENBERG: Why don't we take a ten
 12 minute -- five minutes.
 13 MR. PARMELEE: We'll go again as soon as
 14 he's back.
 15 MR. WITTENBERG: You don't want a break?
 16 MR. PARMELEE: I do not think we need
 17 to.
 18 MR. WITTENBERG: Okay. We're off the
 19 record.
 20 (Brief recess.)
 21 BY MR. WITTENBERG:
 22 Q. Mr. Schoenberger, when Plaintiff
 23 transferred you the monies, close to \$400,000, you
 24 were aware that that was her life savings, were you
 25 not?

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1 **A. No.**
 2 Q. You had no idea?
 3 **A. She had at one point said "That's all I**
 4 **have," but then when we had a conversation she said,**
 5 **"Oh, there's more where that came from."**
 6 **She had also written at some point "It's**
 7 **not millions."**
 8 **And then when I met with her she had**
 9 **told me she had all sorts of jewels or -- you know,**
 10 **jewels and precious metals, gold and whatnot, in**
 11 **Paris.**
 12 Q. So is it your testimony you believed
 13 Plaintiff to be a very wealthy woman?
 14 **A. Never asked her about wealth. She**
 15 **didn't know what my financial situation is. I**
 16 **didn't know what hers was.**
 17 Q. But you have no recollection of -- other
 18 than Plaintiff you just said told you that's all she
 19 had, you just didn't believe her?
 20 **A. She had said in one email that's all**
 21 **there is. But then in a following phone call and**
 22 **then when I was with her she said "Don't worry,**
 23 **Darling. I have jewels. I've got things from my**
 24 **father."**
 25 **She said her father on top of that was a**

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1 jeweler. She also said she had things --
 2 Q. Okay. But nothing in writing?
 3 The only thing in writing perhaps is
 4 when she told you she doesn't have anything that you
 5 mentioned, right?
 6 MR. PARMELEE: Objection. Misstates the
 7 testimony.
 8 But you can answer the question.
 9 BY MR. WITTENBERG:
 10 Q. I think you just told us that she told
 11 you in an email that's all she has, but then in
 12 telephone calls and in person she's telling you she
 13 has all this other money; is that right?
 14 **A. She mentioned that she had exactly what**
 15 **I said. Jewels, furniture. I didn't ask about her**
 16 **financial situation.**
 17 Q. What exhibit are we --
 18 MR. PARMELEE: You've done 1 through 4
 19 or A through D.
 20 THE REPORTER: 5 is the next one.
 21 MR. WITTENBERG: Exhibit 5.
 22 (Whereupon the document referred
 23 to was marked Plaintiff's
 24 Exhibit 5 by the Certified
 25 Shorthand Reporter and is attached

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1 hereto.)
 2 BY MR. WITTENBERG:
 3 Q. While he's looking at that, the master
 4 company you -- we just saw an email where you
 5 referred to the master company as Oasis.
 6 Had you done anything at that point to
 7 set up the company?
 8 **A. I was trying to set it up with Isabella.**
 9 Q. Okay. But had you taken any affirmative
 10 steps to contact a lawyer to set up the company?
 11 **A. I was trying to do that with Isabella.**
 12 Q. Did you do that or not?
 13 I don't want to know what you were
 14 trying to do with Isabella.
 15 Do you understand the difference?
 16 **A. Yeah.**
 17 Q. Between trying to do something with
 18 someone versus actually doing something.
 19 I'm asking if you actually did something
 20 to start the master company Oasis?
 21 **A. Did I make the phone call to an attorney**
 22 **or did I seek --**
 23 Q. That's what I'm asking. I'm asking you
 24 whatever steps you took to set up this master
 25 company you're calling Oasis.

207

1 **A. Okay, Mr. Wittenberg. I started to look**
 2 **through entertainment lawyers, I started to find out**
 3 **what we would need, and then I consulted with**
 4 **Isabella at least three times saying "We should do**
 5 **this. We might want to look at where we**
 6 **incorporate. I want to do this."**
 7 Q. Anything other than looking for
 8 entertainment -- you said attorneys?
 9 **A. Looking for attorneys, we were looking**
 10 **to see what sort of corporation, we were looking at**
 11 **Delaware.**
 12 Q. Who's -- again we? Are you doing this
 13 with someone else? With Isabella or boy yourself?
 14 **A. With the Plaintiff.**
 15 Q. So did you actually contact an attorney?
 16 **A. No.**
 17 Q. You never contacted an attorney to set
 18 up a master -- a company called Oasis?
 19 **A. I felt that it was necessary --**
 20 Q. Yes or no, please. Before you go into
 21 an explanation I need to know the answer. Yes or
 22 no?
 23 **A. Mr. Wittenberg, I'll try to answer the**
 24 **best I can.**
 25 Q. Then yes or no? Did you contact an

208

1 attorney to set up a company called Oasis?
 2 **A. No.**
 3 Q. Okay. At no point, correct?
 4 **A. Because Isabella --**
 5 Q. Is that correct?
 6 **A. -- was not available.**
 7 Q. You can tell us the reasons.
 8 But at no point in time did you ever
 9 contact an attorney to set up a company called
 10 Oasis, correct?
 11 **A. I called around, I spoke to secretaries.**
 12 Q. Okay. No writings at all, just phone
 13 calls that you had calling secretaries?
 14 **A. Looking at Martindale ratings and, you**
 15 **know, that type of thing.**
 16 Q. So let's look at what I just gave you as
 17 Exhibit 5.
 18 So, if we look at Exhibit 5, we'll do
 19 the same thing from the bottom up. We're really
 20 going to look at the bottom of page one.
 21 It's an email that you write on July 4,
 22 2014 at 1610.
 23 Do you see that?
 24 **A. Yeah.**
 25 Q. It says -- and it's an email you wrote

209

1 to Plaintiff, correct?

2 **A. Yes.**

3 Q. And it says,

4 "So I should give you some money

5 back. I did not want to take your

6 money. I have invested much of it

7 so it can keep paying you."

8 Was that true at the time when you said

9 that?

10 **A. Yes.**

11 Q. So, what money did you invest at that

12 time? Remember now it's July 12, 2014?

13 **A. Oh, I'm sorry. I had invested in**

14 **rapidly expanding the YouTube. I had paid for**

15 **musicians. I had paid for promotional things. I**

16 **had a lot of stuff going on before.**

17 **And what she had said before is "Do you**

18 **realize you had never asked me for anything, never**

19 **hinted at anything at all."**

20 **And so this kind of --**

21 Q. When you say -- you're talking about

22 before -- you're going ahead of time. I'm still

23 focused on before.

24 **A. Well, it was a response.**

25 Q. Let's before we --

210

1 **A. Okay.**

2 Q. Again, Mr. Schoenberger, we can do this

3 and we can do another deposition later if we can't

4 get through today.

5 I know you want to put on your case.

6 You'll have a chance with your attorney.

7 **A. I'm not looking --**

8 Q. Now is a chance for me to ask you about

9 things you wrote and what you meant when you wrote

10 them. Okay?

11 Can you just -- okay? Is that all

12 right?

13 **A. Mr. Wittenberg, I agree.**

14 Q. Okay.

15 **A. But when you're asking me about**

16 **something that's in context and you're showing me an**

17 **email thread, sometimes it's pertinent what's**

18 **written because it's a response.**

19 Q. You wrote?

20 "I have invested much of it."

21 She sent you \$400,000. At this time do

22 you know how much you invested?

23 MR. PARMELEE: Objection. Argumentative

24 that the investment refers to the \$400,000. But you

25 can answer.

211

1 BY MR. WITTENBERG:

2 Q. Okay. Let me ask you a question.

3 You write here,

4 "I did not want to take your money.

5 I invested much of it."

6 Are you referring -- does this refer to

7 the roughly 400,000 that was transferred to you by

8 Plaintiff?

9 **A. I don't recall.**

10 Q. Well, as you sit here right now what do

11 you think?

12 **A. This had to do with a conversation, not**

13 **just this -- we were talking at this time. So it**

14 **would -- it would have to include what my memory is**

15 **of the conversation. And I don't recall the exact**

16 **conversation.**

17 Q. So, you don't know the context within

18 which you're talking about taking Plaintiff's money

19 and investing much of it? Is that your testimony?

20 You just don't know what this is about?

21 **A. We had a conversation on or about**

22 **July 4th, 2014 in which we discussed when she can**

23 **come out. Prior to this she had also known that I**

24 **had to pay lawyers, that I was in the fight of my**

25 **life.**

212

1 Q. Okay.

2 **A. But the investment that I had been**

3 **discussing in particular here was an investment in**

4 **Sophia Musik and ultimately, as I put in earlier**

5 **emails, I wanted Sophia Musik to be under the**

6 **umbrella of Oasis.**

7 Q. Okay. So when you say the second part,

8 "so it can keep paying you," aren't you telling

9 Plaintiff that you invested her money so that she

10 can keep making money on her invested money? Is

11 that not what you intended?

12 **A. Can I --**

13 Q. It's really a "yes" or "no."

14 **A. But it really isn't.**

15 Q. Okay.

16 **A. If I can just have one minute. I'm not**

17 **trying -- I'm not trying to be evasive and I'm not**

18 **trying to frustrate you.**

19 **If you take a look at the content of the**

20 **emails, the Plaintiff is discussing love, love,**

21 **love. And I'm trying to say let's get down to a --**

22 **to creating something magical.**

23 Q. So you are telling her you're going to

24 use her money to make her money again, aren't you?

25 **A. I was telling her I was going to use my**

213

1 talents, I was going to tell her -- I told her I was
 2 going to use my connections and my hard work to
 3 build a huge company, that what was I wanted to do.
 4 Q. To keep paying her money, right?
 5 A. Yeah. Keep -- I wanted her to -- to do
 6 well.
 7 Q. You didn't want her broke, right?
 8 A. Yeah.
 9 Q. You wanted her to make money with the
 10 money she gave you, right?
 11 A. No. I'm not saying that. I wanted to
 12 build a company so everybody would make money, put
 13 heart -- heart and soul into this.
 14 Q. You go into the top email Friday,
 15 July 4th, and it says -- this is Ms. Gauthier
 16 Plaintiff telling you it's what she always wanted
 17 Oasis to be, "Thanks to your talent, hard work,
 18 commitment and heart, Oasis will be something."
 19 A. Where are you reading this?
 20 Q. Right above the email --
 21 A. Okay.
 22 Q. -- July 4th --
 23 A. So it says -- okay.
 24 Q. And she says -- she compliments you
 25 towards the end and says that,

214

1 "Multi-talented adaptive skills may
 2 be the biggest wealth one may
 3 have."
 4 So she's not worried and she thanks you
 5 for telling her that you don't want to leave her
 6 broke and that you're going to keep investing the
 7 money so it could keep paying her.
 8 Isn't that what's happening?
 9 A. Well, I really wanted to see Oasis
 10 built. She starts out on this email saying,
 11 "You never even asked for anything.
 12 Never even hinted at anything at
 13 all. I guess I simply felt in my
 14 heart that it was the right thing
 15 to do."
 16 Q. What does that mean to you?
 17 A. This means that it's a donation.
 18 Q. At this point in your mind it was a gift
 19 to you?
 20 A. It was a gift the moment it was
 21 transferred.
 22 The obligation that I felt after the
 23 transfer was like anybody else who had received a
 24 large amount of money. I -- my instinct was I loved
 25 her, I wanted to start something huge. I believe to

215

1 this day that the Oasis model would have been good.
 2 You -- Brian Weiner, who you have
 3 deposed, said it could have been a billion dollar
 4 company. I did not walk away from it, sir. I --
 5 you know --
 6 Q. Didn't do anything to start it either,
 7 did you?
 8 A. I did a lot. If --
 9 Q. What did you do by this point in time
 10 July 4th? What did you do?
 11 You said -- you just told us -- and I
 12 don't want to be argumentative, but I'm trying to
 13 figure out where you're at. You looked at some ads
 14 for lawyers and talked to receptionists about
 15 setting up a company.
 16 You haven't told us anything else you've
 17 done, because nothing else was done, right?
 18 A. If you consider that I was willing to
 19 put Sophia Musik in it, we're talking thousands and
 20 thousands and thousands of hours. We're talking --
 21 Q. So you put in thousands and thousands of
 22 hours into the business with Plaintiff?
 23 A. Into Sophia Musik which --
 24 Q. Does that have a value, Sophia Musik?
 25 A. You cannot determine the value until the

216

1 songs are placed. Then the value will be very good.
 2 Q. Does it make any money?
 3 A. No. But it will.
 4 Q. Okay. Do you see at the top here of the
 5 email chain on July 4th where you just told us that
 6 you thought Isabelle is writing to you again it's a
 7 gift, you know, "I never asked for anything in
 8 return," you write,
 9 "I never ask and I am like you. We
 10 much" -- "we much do Oasis. It is
 11 what it was meant to be. You own
 12 it. I want to be clear. You own
 13 it again."
 14 Two weeks after she transfers you the
 15 money and you're were telling her -- you're telling
 16 us it's a gift. You're saying you own it, the
 17 company, right? Oasis, correct? Okay.
 18 A. Yeah.
 19 Q. And this is the same master company
 20 Oasis that you were talking about in the prior
 21 email, right?
 22 A. This is what I had hoped would be built
 23 out into a huge business.
 24 I'm not the one that put a knife through
 25 its heart.

217

1 Q. Okay. Let's go to the next exhibit.
 2 This will be Exhibit 6.
 3 (Whereupon the document referred
 4 to was marked Plaintiff's
 5 Exhibit 6 by the Certified
 6 Shorthand Reporter and is attached
 7 hereto.)
 8 BY MR. WITTENBERG:
 9 Q. Let me know when you're ready,
 10 Mr. Schoenberger.
 11 A. Sure. Okay. I'm ready.
 12 Q. So, if we just look at the email on top
 13 here, 15 July 2014 at 15:08:46.
 14 Do you see that?
 15 A. Yeah.
 16 Q. And you're using the same email
 17 thomasschoenbergermusik@gmail, right?
 18 A. Uh-huh.
 19 Q. And you email Plaintiff that you used
 20 the funds to make things better, you're setting up
 21 an L.L.C. called Oasis in Delaware.
 22 Okay. Did you ever set up an L.L.C. in
 23 Delaware called Oasis?
 24 A. We had spoken right after this, and I
 25 had said "We Can do all this when you come out

218

1 here." So --
 2 Q. I'm asking you --
 3 A. Did I, yes or no? No.
 4 Q. At the time -- at the time you wrote "I
 5 am setting up."
 6 At the time that was not true; is that
 7 correct?
 8 A. It's not a matter of not true. It
 9 wasn't done. But it doesn't make it false.
 10 Q. Well, you just said we were going to do
 11 it later. But at the time you wrote this you said,
 12 "I'm setting up an L.L.C. in
 13 Delaware for Oasis."
 14 At that time were you in fact setting up
 15 an L.L.C. in Delaware or not?
 16 A. We spoke --
 17 Q. I get that. I don't know -- you spoke
 18 later. That's fine. It doesn't matter.
 19 A. Okay.
 20 Q. You wrote this on July 15th that you're
 21 setting up an L.L.C. called Oasis in Delaware.
 22 And now we know that's not true, right?
 23 A. Mr. Wittenberg, I feel -- and I want to
 24 do this with all social etiquette, I feel you're
 25 being combative -- combative.

219

1 What I'm trying to tell you is the
 2 truth, which is we spoke about this. And then after
 3 I did research on this L.L.C., I realized that she
 4 had to be there with me. So there is nothing that
 5 we could have done.
 6 We had planned -- she was going to stay
 7 till November. We could have had all this done.
 8 She had come out in August, she was going to stay
 9 till November. She cut her trip short.
 10 Q. Okay. Just for closure, you never set
 11 up an L.L.C. in Delaware, correct?
 12 A. Correct.
 13 Q. And it says here, though, on July 15th,
 14 right?
 15 A. Yeah.
 16 Q. Now we're getting into almost a month
 17 after funds are transferred, certainly well after
 18 three weeks, "it has you as the owner of this
 19 company called Oasis," right? It's past tense,
 20 right? "It has you as the owner?"
 21 It's not saying I will make you the
 22 owner. It says "it has you as the owner." Is that
 23 right.
 24 A. Yeah. But it says "I am setting up. It
 25 has you as the owner."

220

1 Q. So, not true?
 2 A. Well, we never did it because she cut
 3 her thing short.
 4 Q. But you certainly didn't do it at the
 5 time you wrote this on July 15th, correct?
 6 A. This is where I did the investigation.
 7 Q. You didn't do this on July 15th when you
 8 wrote the email, correct?
 9 A. Correct.
 10 Q. Now, you say,
 11 "I am just a monk who could tend to
 12 its garden."
 13 Don't you mean by that she owns the
 14 company, she transferred to you the money, and
 15 you're just going to use your talents to grow the
 16 investment into something big?
 17 MR. PARMELEE: Objection.
 18 Argumentative, requires the adoption of a fact.
 19 But you can answer.
 20 BY MR. WITTENBERG:
 21 Q. What did you mean by "just a monk who
 22 could tend to its garden"?
 23 A. I was going to connect her with
 24 everybody which --
 25 Did she ever tell you what Oasis is?

221

1 **And could I use the restroom really**
 2 **quickly? Because I've been waiting for a while.**
 3 MR. PARMELEE: You can't --
 4 BY MR. WITTENBERG:
 5 Q. Hold on. Didn't you just go five
 6 minutes ago?
 7 **A. Yes, I did. I had a lot of coffee this**
 8 **morning.**
 9 Q. Did you use the restroom five or ten
 10 minutes ago? Do you remember?
 11 **A. 15 minutes ago.**
 12 Q. Yeah.
 13 **A. I'll be very quick.**
 14 Q. Okay. Why don't we take break. He can
 15 use the restroom like he said he needed to.
 16 (Brief recess.)
 17 BY MR. WITTENBERG:
 18 Q. Okay. Before we took another break we
 19 were looking at Exhibit 6.
 20 Do you still have that?
 21 **A. Yes.**
 22 Q. Okay. Do you see that it says "I am
 23 just a monk who can tend to its garden"?
 24 **A. Yes.**
 25 Q. You wrote that, correct?

222

1 **A. (No audible response.)**
 2 Q. Yes, you wrote that, correct?
 3 **A. I wrote that.**
 4 Q. And can you tell us what you meant when
 5 you told that to Plaintiff?
 6 **A. We had a conversation where -- we**
 7 **actually had a good conversation. I don't remember**
 8 **exactly the date, but it was within a week before we**
 9 **did this.**
 10 And she was stating that she felt
 11 **lighter than air having given away money.**
 12 And I was basically saying money is
 13 **worthless, it's going to be a race to the bottom for**
 14 **Fiat currencies, and let's build something that**
 15 **brings happiness to artists, you know.**
 16 And I guess, you know, one thing is she
 17 said "Oh, I feel so happy, I feel so light. You
 18 know, I'm glad I -- you know, it was an albatross
 19 around my -- around my neck." I think this was the
 20 **term.**
 21 Q. So you're telling her that you -- again
 22 it's a long explanation and I want to know exactly
 23 maybe if I'm getting it.
 24 So you said,
 25 "I'm just a monk who can tend to

223

1 the garden of an L.L.C. being set
 2 up for Oasis in Delaware where
 3 Plaintiff is the owner."
 4 So -- but why exactly?
 5 **A. Why is what good?**
 6 Q. No. Why exactly are you telling her
 7 you'll tend to a garden of the L.L.C. you're setting
 8 up called Oasis in Delaware where Plaintiff is the
 9 owner?
 10 Why are you telling her you're a monk
 11 that's going to tend to that garden?
 12 **A. Well, basically if you look at the**
 13 **sentence before that, I said "I used the funds to**
 14 **make things better to truly effect change."**
 15 And then it went into a specific where,
 16 **you know, the goal was to set up an L.L.C. And then**
 17 **there was dot-dot-dot, and then "I am just the monk**
 18 **who can tend to its garden."**
 19 **So, in my mind, I wanted to have this**
 20 **cyber salon. I wanted Isabella in charge of it.**
 21 Q. Okay. Because that was -- okay. Let's
 22 move to the email two below. It says July 14, 1451,
 23 you're emailing Plaintiff saying you're working with
 24 a team of scientists to replicate the sun.
 25 Do you remember writing that?

224

1 **A. Uh-huh.**
 2 Q. And we touched on this a bit earlier
 3 today, but can you tell us the team of scientists by
 4 name that you were working with?
 5 **A. Well, I had written this right after I**
 6 **had heard from Warren Zide that got me in touch with**
 7 **a gentleman named Brian Light.**
 8 **Brian had described that he's worked**
 9 **with a team of scientists to come up with these**
 10 **incredibly bright lights that do replicate the sun.**
 11 **He named a team of scientists that he had worked**
 12 **with back East.**
 13 **I am attempting to get ahold of Brian**
 14 **Light right now. I did send him out an email, and I**
 15 **have not had any response.**
 16 Q. So you weren't working with a team
 17 personally; is that right?
 18 **A. He wanted to --**
 19 Q. Is that right? Yes or no? Were you
 20 working personally with a team of scientists at the
 21 time?
 22 MR. PARMELEE: Objection. Vague and
 23 ambiguous as to "team of scientists."
 24 But he can answer the question.
 25 ///

225

1 BY MR. WITTENBERG:
 2 Q. Yeah. You can answer the question.
 3 You were working with Brian Light,
 4 you're telling us, correct? That's it?
 5 **A. Yes. But Brian had introduced the idea**
 6 **of an underground drone to his team of scientists**
 7 **who felt that it was very viable.**
 8 Q. To replicate the sun?
 9 **A. No. This was the team of scientists --**
 10 **I am working with a team of scientists to replicate**
 11 **the sun.**
 12 **What I meant by that is I had dealt with**
 13 **Brian Light, we had been discussing things, and I**
 14 **had said "What about crops?"**
 15 **Brian had said "You can meet the team**
 16 **soon."**
 17 **So, was I working with a team of**
 18 **scientists? No. I had met Brian Light.**
 19 Q. Do you have any writings to show that
 20 you were involved with this team of scientists in
 21 any way?
 22 **A. I have something that Brian created with**
 23 **his partner who -- Brian Weiner, by the way, who is**
 24 **being deposed tomorrow at 1 o'clock. And I**
 25 **believe that Brian was with us with Brian -- with**

226

1 **Brian Light --**
 2 Q. Do you have any writings between you and
 3 Mr. Light regarding this --
 4 **A. I did. This is once again --**
 5 Q. On the --
 6 **A. Yeah.**
 7 Q. None of them exist anymore. Is that
 8 your testimony?
 9 **A. No. May 17th was the last time that I**
 10 **was able to get onto my Facebook.**
 11 Q. Remember, though, this is July 15th when
 12 you're emailing Plaintiff, telling her you're
 13 working with this team of scientists that include
 14 Brian Light.
 15 **A. Yeah.**
 16 Q. But now you're telling us that any
 17 emails you had with Brian Light, which you did email
 18 with Brian Light, are gone --
 19 **A. Yeah.**
 20 Q. -- because you were hacked in May?
 21 **A. May of 2015.**
 22 Q. Oh, May of 2015?
 23 **A. Yeah.**
 24 Q. So you have no emails from before May of
 25 2015?

227

1 **A. They -- they basically put in a virus,**
 2 **they put in malware that not only wiped --**
 3 Q. I don't know what they did and I don't
 4 care.
 5 I want to know do you have access to
 6 emails before May 15, 2015 or not?
 7 **A. No.**
 8 Q. You have no access to any of your
 9 emails --
 10 **A. No.**
 11 Q. -- prior to May 15, 2015?
 12 **A. No. I had a heart worm. It's a --**
 13 Q. So all emails that you've ever sent and
 14 received to -- well, let's back up.
 15 List for me each one of your email
 16 accounts, please. Let's go one at a time.
 17 **A. I only had Thomas Schoenberger -- or**
 18 **thomasschoenbergermusik@gmail.**
 19 Q. Okay. Did you ever have another email
 20 that you used besides thomasschoenberger@gmail?
 21 **A. No. My Facebook, I guess.**
 22 Q. Okay. So other than your Facebook --
 23 MR. PARMELEE: Just to clarify, are you
 24 asking at any time?
 25 MR. WITTENBERG: I think that's --

228

1 MR. PARMELEE: Or the time period here?
 2 I just want to --
 3 BY MR. WITTENBERG:
 4 Q. Look, I'm just trying to understand --
 5 seriously just tell me what emails you've used in
 6 your life, what emails addresses?
 7 MR. PARMELEE: Objection. Overbroad.
 8 But you can --
 9 MR. WITTENBERG: Overbroad.
 10 BY MR. WITTENBERG:
 11 Q. From the beginning of time,
 12 Mr. Schoenberger, tell me what email address you've
 13 used.
 14 **A. Well, I've used AOL email addresses that**
 15 **I don't --**
 16 Q. When did you stop using these AOL email
 17 addresses you're talking about?
 18 **A. 2002.**
 19 Q. Okay. Since 2002 name every email
 20 address that you've ever used, please.
 21 **A. I don't have a recollection for every**
 22 **single email that I've used.**
 23 Q. Tell us the ones you do recollect, Mr.
 24 Schoenberger.
 25 **A. Okay. Thomasschoenbergermusik.**

229	<p>1 Q. When did you use that?</p> <p>2 A. 2013, '14 and '15. And before that --</p> <p>3 Q. Hold on. Let's go slow.</p> <p>4 Thomasschoenberger@musik.com?</p> <p>5 A. No. No, Mr. Wittenberg.</p> <p>6 Thomasschoenbergermusik.</p> <p>7 Q. Oh, the one word,</p> <p>8 thomasschoenbergermusik at what?</p> <p>9 A. Gmail.com.</p> <p>10 Q. When did you use that email? What</p> <p>11 period of time?</p> <p>12 A. 2013 to May -- roughly May 14th or 15th</p> <p>13 of 2017 -- or 2015.</p> <p>14 Q. Is that the email that you're telling us</p> <p>15 was hacked?</p> <p>16 A. (No audible response.)</p> <p>17 Q. Okay. And it's a gmail account,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. Now, all the emails that you had from</p> <p>21 that period of time you just told us are all gone</p> <p>22 because of this virus; is that your testimony?</p> <p>23 A. They ended up wiping out my hard drive.</p> <p>24 I had to get --</p> <p>25 Q. Is it a yes?</p>	231	<p>1 A. Yes.</p> <p>2 Q. How did you find Mr. Parmelee to</p> <p>3 represent you?</p> <p>4 MR. PARMELEE: Objection. Relevance.</p> <p>5 You can answer the question.</p> <p>6 THE WITNESS: Okay. I've known</p> <p>7 Mr. Friedman, who is one of the principals of</p> <p>8 Friedman Law, since the '70's.</p> <p>9 BY MR. WITTENBERG:</p> <p>10 Q. Is he a good friend of yours?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Did you grow up together with</p> <p>13 Mr. Friedman?</p> <p>14 A. Yeah.</p> <p>15 Q. Are you the same age?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So you identified two email</p> <p>18 addresses that you used in the last few years since</p> <p>19 2013?</p> <p>20 A. Yeah.</p> <p>21 Q. Have you used any other email addresses</p> <p>22 besides those two since 2013?</p> <p>23 A. I don't recall. I had another cell</p> <p>24 phone where I had some sort of strange email that I</p> <p>25 don't even remember, because I had the phone for a</p>
230	<p>1 A. Yes.</p> <p>2 Q. You have no access to these gmail</p> <p>3 emails --</p> <p>4 A. None.</p> <p>5 Q. -- from 2013 to 2015?</p> <p>6 A. None.</p> <p>7 Q. Okay. What other email address did you</p> <p>8 use in the last few years besides that one?</p> <p>9 A. Can you please characterize what "few</p> <p>10 years" means?</p> <p>11 Q. Yeah. Go back to 2013.</p> <p>12 A. Just thomasschoenbergermusik@gmail,</p> <p>13 ThomasAndrew54@hotmail, which I no longer use.</p> <p>14 Q. When did you stop using that?</p> <p>15 A. A week ago.</p> <p>16 Q. Okay. How long did you use it?</p> <p>17 A. Two months. And only to communicate</p> <p>18 with my attorneys.</p> <p>19 Q. Oh, you created that solely for the</p> <p>20 purpose of communicating with Mr. Parmelee?</p> <p>21 A. Yeah.</p> <p>22 Q. But you created it only two months ago?</p> <p>23 A. Yeah.</p> <p>24 Q. But you retained Mr. Parmelee well over</p> <p>25 a year ago, right?</p>	232	<p>1 little bit. It bothered me. I threw it away. But</p> <p>2 there's some, you know, temporary email.</p> <p>3 Q. Okay. So when you received a request</p> <p>4 from your attorney that was from us to go through</p> <p>5 your records and find all communications regarding</p> <p>6 the lawsuit, Plaintiff, investments, you couldn't</p> <p>7 get any because they were all gone?</p> <p>8 Is that -- or when -- how did that</p> <p>9 happen?</p> <p>10 When did you first look for all these</p> <p>11 emails?</p> <p>12 A. I was served in November of 2014.</p> <p>13 Q. Uh-huh.</p> <p>14 A. And afterwards I met with</p> <p>15 Mr. Friedman --</p> <p>16 MR. PARMELEE: Don't talk about our</p> <p>17 communications.</p> <p>18 THE WITNESS: Oh, okay. Sorry. All</p> <p>19 right.</p> <p>20 And I was hacked by May of --</p> <p>21 BY MR. WITTENBERG:</p> <p>22 Q. Did you print out any emails for</p> <p>23 Mr. Parmelee prior to the time you were hacked?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Did you print out all of the</p>

233

1 emails related to the investments you made and I
 2 guess relating to Plaintiff before your email was
 3 hacked?
 4 **A. Yes. I believe so.**
 5 Q. Okay. So I'm going to turn your
 6 attention back to Exhibit 6, the same paragraph
 7 under the 15 July 2014 email where you say you're
 8 working with a team of scientists to replicate the
 9 sun.
 10 Down toward four lines down you say,
 11 "This is just one investment."
 12 You were telling -- am I correct you
 13 were telling Plaintiff that this was an investment
 14 you were going to make with her money?
 15 **A. No.**
 16 Q. What are you telling her there?
 17 **A. This is just one investment. It doesn't**
 18 **mention specifically Oasis or Plaintiff.**
 19 Q. What does it mean by "investment"? What
 20 do you intend to say to Plaintiff there?
 21 **A. We had a conversation earlier, and we**
 22 **talked about how we invest our time and how we**
 23 **invest our hours.**
 24 **She said that she invests her name by**
 25 **communicating with nature. She goes with her two**

234

1 **dogs, one was named Koojo.**
 2 Q. I'm asking what you intended by "one
 3 investment"; not what Plaintiff was trying to do
 4 with whatever.
 5 So if you could just tell us, what did
 6 you mean by "one investment"?
 7 Did you -- was it an investment to make
 8 money or was it not?
 9 **A. No. Because I didn't put any investment**
 10 **into this human being other than buying a ruby from**
 11 **him.**
 12 Q. Okay. And we'll go on. There's -- if
 13 you turn the page --
 14 **A. Sure.**
 15 Q. -- you'll see July 14, Monday July 14 at
 16 7:26 A.M., Sophia Musik, Thomas Schoenberger wrote,
 17 "I love you, Baby. I got us
 18 involved in great things."
 19 What are you telling Plaintiff there?
 20 First of all, who is the "us" and what
 21 does "involved" mean?
 22 Well, let's do it one by one. Who is
 23 the "us"?
 24 **A. The "us" would be her and I.**
 25 Q. Plaintiff and you?

235

1 **A. Yes.**
 2 Q. Okay. "Involved," what does that mean?
 3 **A. Involved, I was trying to make her**
 4 **happy. She had seemed really depressed and she had**
 5 **been distant. So when I said "I got us involved in**
 6 **great things," it was right before I had completed**
 7 **another piece of music for her.**
 8 **I was also dealing with a gentleman**
 9 **named Costas.**
 10 Q. Can you spell that for her?
 11 **A. C-o-s-t-a-s. But what I meant by that**
 12 **is right around that time Brian Weiner had told me**
 13 **that he is in contact with people who had gotten**
 14 **funding from a man named Tim Draper, D-r-a-p-e-r,**
 15 **and that Brian felt that he was going to be able to**
 16 **find management for my music.**
 17 **So at this point I was very much in love**
 18 **with Plaintiff and wanted a life with her.**
 19 Q. So when you said "I got us involved in
 20 great things," that didn't -- you did not mean
 21 business or did you mean business?
 22 **A. I was trying to cheer her up and I was**
 23 **trying to say good things are going to come from my**
 24 **music. And since I love you, ergo, that's that.**
 25 Q. Okay. And when you say "more as

236

1 well" -- sorry, this is back down on the first page,
 2 "This is just one investment more,
 3 as well."
 4 In the middle as you can see under your
 5 July 15, 2014 at 1451, you're telling Plaintiff that
 6 there are going to be more investments that you're
 7 going to make, right?
 8 **A. No.**
 9 Q. No?
 10 Okay. What are you telling her?
 11 **A. Telling her that I'm looking at things,**
 12 **that I'm looking at investments.**
 13 Q. Okay.
 14 **A. That I'm looking to expand the business**
 15 **model.**
 16 Q. And why are you telling her she'll be
 17 pleased?
 18 **A. Because she was so encouraging with my**
 19 **music and saying, "Wow, what you're doing is**
 20 **changing the world."**
 21 Q. Okay. So you really wanted Plaintiff to
 22 think you were investing her money, correct?
 23 **A. That's an assumption.**
 24 Q. I'm asking you. Yes or no?
 25 **A. That I was investing her money?**

237

1 Q. You wanted by sending her all these
 2 emails I'm showing, this chain, you wanted Plaintiff
 3 to think you're investing her money; isn't that
 4 right?
 5 A. We had had discussions by this time that
 6 I had had to throw money at lawyers and other
 7 things.
 8 Q. So, you're denying -- again you want to
 9 go on a discussion.
 10 A. Okay.
 11 Q. Yes or no? When you were writing these
 12 did you want Plaintiff to believe you were investing
 13 the money or not?
 14 A. Investing in what?
 15 Q. That's what I'm --
 16 A. That's what I'm saying.
 17 Q. I'm going to break it down for you.
 18 A. I'm going to say "yes," but I was
 19 talking about my music and I was talking about ways
 20 to reach mass audience.
 21 Q. So you're now saying -- in writing these
 22 emails we were just going over, you wanted Plaintiff
 23 to think that you were investing her money?
 24 MR. PARMELEE: Objection. Misstates his
 25 testimony.

238

1 But you can answer.
 2 MR. WITTENBERG: He just said "Yes." So
 3 we're trying to figure out which way he's going to
 4 go.
 5 BY MR. WITTENBERG:
 6 Q. Did you want her to think you were
 7 investing her money in businesses by sending her
 8 these emails?
 9 A. In businesses? I don't understand your
 10 question.
 11 Mr. Wittenberg, I'm not trying to be
 12 difficult, but the way that you phrase it as if I
 13 somehow took her money while it was under donation
 14 and I was throwing it at various investments. I'm
 15 working with a team of scientists.
 16 I was looking at investment
 17 opportunities, but I was looking to expand Sophia
 18 Musik. And what I wanted was I wanted Oasis, and I
 19 wanted her to be the queen of Oasis.
 20 Q. So did you want her to think you were
 21 investing her money in businesses? Yes or no?
 22 A. Yes. But I --
 23 Q. Okay. Now --
 24 A. Can I finish my answer, yes, but?
 25 Q. I think you're going to -- go ahead.

239

1 Finish the but part.
 2 A. Yes. But it also included my music, it
 3 also included intellectual properties.
 4 Q. Intellectual properties like what?
 5 A. Things that I was inventing.
 6 Q. Like what?
 7 A. What we discussed, encryption --
 8 Q. You --
 9 A. Well, encryption within music.
 10 Q. And these were businesses that you were
 11 going to create, right?
 12 So you are saying you wanted her to
 13 think you were investing money in various businesses
 14 including the ones that were your own ideas,
 15 correct?
 16 A. I wanted to cheer her up.
 17 Q. So you were only telling her that it's
 18 just one investment, you're working with a team of
 19 scientists, she's the owner of the L.L.C. Oasis, you
 20 were just trying to cheer her up? You didn't mean
 21 it?
 22 A. Oh, no. I was absolutely serious about
 23 it. That's what I wanted to do.
 24 But did I want her to think that all of
 25 her, quote-unquote, as you put it, investment was

240

1 going into that, that's just not true.
 2 I had discussions with her saying that
 3 "You've saved my life. I've had to put out a whole
 4 bunch of debt." She knew that prior to these
 5 emails.
 6 Q. And you're saying she knew that because
 7 you told her that on the phone or to person?
 8 A. Yes.
 9 Q. But you never told her on any single
 10 writing that ever existed, correct?
 11 A. (No audible response.)
 12 Q. You can easily show -- the answer was
 13 no? You just shook her head "no."
 14 A. No. I'm saying I don't recall.
 15 Q. You never told her that you were using
 16 her money to pay debts, right?
 17 A. I don't think there would be a reason
 18 for me to email her this --
 19 Q. So you're saying no, you never told her
 20 in email or in a Facebook message that you're
 21 raising her money to pay debts, right?
 22 A. Not that I can recall.
 23 Q. And you said you had several phone calls
 24 with Plaintiff?
 25 A. Yes.

241

1 Q. Okay.

2 **A. I never had spoken to her prior to her**

3 **giving me money.**

4 Q. Yeah. And when was the first time you

5 think you spoke with Plaintiff on the telephone?

6 **A. It must have been a day after or the --**

7 **the day.**

8 Q. Okay. And what -- we went over this. I

9 want to be clear with discovery requests I'm going

10 to send -- right? -- that we'll give to your counsel

11 tomorrow.

12 In what period did you have telephone

13 conversations with Plaintiff?

14 **A. This is a guesstimate, but I would**

15 **assume from one day after the money was wired, I**

16 **first sent her a thing saying "Did you mean to send**

17 **this amount or" --**

18 Q. Did you call her number from your home

19 number or from a cell phone?

20 **A. Cell phone.**

21 Q. What's the number of your cell phone?

22 **A. Cell phone number, I think it was -- I**

23 **don't remember the number. That's -- it was --**

24 Q. Have you changed cell phones since?

25 **A. Yeah.**

242

1 Q. Okay. So you don't have the same cell

2 phone number you used when you called Plaintiff in

3 2014 on a number of occasions?

4 **A. I don't even have the same phone.**

5 Q. Okay. And you cancelled that phone

6 service?

7 **A. Yeah.**

8 Q. So there's -- do you think there's any

9 way you can come up with the phone records to show

10 that you in fact called Plaintiff?

11 **A. I can look for it, yeah.**

12 Q. Okay. Who would you look for? Who

13 would you contact?

14 **A. I assume AT&T. I'm not sure.**

15 Q. Why do you assume?

16 **A. Because I think I was with AT&T. I'm**

17 **with T-Mobile now, but during that period it would**

18 **be AT&T.**

19 **And I'm sure Plaintiff will probably**

20 **have copies of that, too.**

21 Q. Don't be so sure. Okay?

22 We don't believe they existed and we

23 don't believe you can prove any of this and we don't

24 believe you have phone records to show they existed.

25 If you do, you'll give them to your counsel and

243

1 we'll have them within 30 days.

2 **A. You don't believe that we spoke on the**

3 **phone before --**

4 Q. You're the one that told us earlier you

5 didn't speak on the phone until she arrived or

6 something on those lines?

7 **A. I actually never said that.**

8 Q. Okay.

9 **A. And let me use the restroom one more**

10 **time. Excuse me. I'm sorry, but too much coffee.**

11 MR. WITTENBERG: Off the record.

12 (Brief recess.)

13 BY MR. WITTENBERG:

14 Q. So, before -- before you walked out of

15 the room, took another break, I want to just make

16 sure I understand.

17 We just looked at emails. You said you

18 were making an investment, more to come.

19 Do you remember that?

20 We can look at the email again if you

21 like.

22 **A. Yeah. We had gone over that, and then**

23 **you had told me that you didn't believe that I had**

24 **ever spoken to Ms. Gauthier --**

25 Q. I believe you would have produced the

244

1 phone records in response to the request we've

2 already made. And I'll have to look and see. But

3 if there's no record, I don't know why -- if there

4 is a record, I don't know why you wouldn't produce

5 that.

6 **A. I think that we're in luck. Because in**

7 **recollecting, I think that I had my T -- T-Mobile,**

8 **which would have been June. So it would have been**

9 **in that thing.**

10 **So I might be able to find texts. I**

11 **just need to call them. I wasn't aware that --**

12 Q. Okay. Very good.

13 **A. Yeah. Absolutely.**

14 Q. I just want to clear up that you said

15 that's just one investment. More as well. I want

16 to just have clarity.

17 Was that an investment of money that

18 you're talking about? Yes or no?

19 Was that an investment of money?

20 **A. Where? Is that on page two?**

21 Q. This is on page one of four of

22 Exhibit 6. It is in the middle of the page under

23 the email that you sent on July 15th at 1451. And

24 it's the email where you say you're working on with

25 a team of scientists to replicate the sun.

245

1 **A. I see.**
 2 Q. And you said this is just one
 3 investment. More as well.
 4 Yes or no, Mr. Schoenberger, were you
 5 referring to an investment of money when you wrote
 6 this to Plaintiff?
 7 **A. Not necessarily. Potential investment.**
 8 **And it could have been my sweat equity.**
 9 Q. You just said "not necessarily." So
 10 that's -- is that yes and no at the same time?
 11 **A. No. This is -- this is showing her --**
 12 **this is one thing that's fallen in my lap. I didn't**
 13 **say, "I put money into this." I said, "I am working**
 14 **with a team," you know. And this is predicated by**
 15 **phone calls that we have had before where I was**
 16 **trying to get my --**
 17 Q. Are you're suggesting that you may
 18 invest money? If you're not saying you already did,
 19 you're suggesting I may invest money into these
 20 things?
 21 **A. Yeah.**
 22 Q. So this is an investment of money you're
 23 talking about?
 24 **A. Yeah.**
 25 Q. Okay. And the money would be the money

246

1 transferred to you by Plaintiff, correct?
 2 **A. Not necessarily.**
 3 Q. At the time, remember, you had no other
 4 money, you told us, right?
 5 **A. We were working on a \$50 million loan**
 6 **with Brian Light.**
 7 Q. Working on -- do you understand the
 8 difference between working on \$50 million and having
 9 it?
 10 **A. Sure.**
 11 Q. So at the time you didn't have it,
 12 right?
 13 We looked at your bank statement that
 14 showed you had a couple hundred dollars almost by
 15 the time Plaintiff wired you almost \$400,000.
 16 So you had no other money at the time,
 17 right?
 18 **A. Do you understand that an investment can**
 19 **mean sweat equity or a lot of other things? It**
 20 **doesn't have to be money.**
 21 Q. But you just told us that it's an
 22 investment of money.
 23 **A. I said it was a potential investment I**
 24 **was looking at.**
 25 Q. Right. And you were going to use

247

1 Plaintiff's money that she transferred to you to
 2 make these investments?
 3 **A. That's an assumption that is not**
 4 **necessarily true.**
 5 Q. So you weren't going to use Plaintiff's
 6 money to make these investments; is that right?
 7 **A. I was looking at investments in a broad**
 8 **scope. I was attempting to get a \$50 million loan**
 9 **for Brian Weiner, and of that he was going to help**
 10 **to build out Oasis.**
 11 I'm sorry that it sounds serpentine.
 12 I'm not trying to frustrate you, Mr. Wine -- or
 13 Mr. Wittenberg. I'm so sorry.
 14 Q. You also say that -- I think here that
 15 you want to use -- make sure I get the right --- oh,
 16 at the very top,
 17 "I used the funds to make things
 18 better, to truly effect change."
 19 What are you -- what are you saying --
 20 to what were you referring there? You used the
 21 funds. What funds are you talking about?
 22 **A. Funds that she had given me that she had**
 23 **donated to me and --**
 24 Q. So the \$400,000 approximately? You're
 25 telling her that you will use the funds, right, her

248

1 money --
 2 **A. I'm telling her "I'll use the funds"**
 3 **or -- I used the funds to make things better. So**
 4 **it's present force -- present tense.**
 5 Q. So you use, I assume you're saying you
 6 will use or will use the funds that Plaintiff
 7 transferred to you to make things better to truly
 8 effecting change?
 9 **A. Actually it's presence, it's not past**
 10 **sense. I used the funds to truly affect change.**
 11 Q. How were you doing that at this time?
 12 **A. Paying lawyers when I was going through**
 13 **a -- what I believe is a corrupt system of**
 14 **government.**
 15 Q. Do you mean paying the lawyers to defend
 16 you against the gentlemen prosecuting you for
 17 stalking?
 18 Is that what you're referring to?
 19 **A. Prosecuting me for phone calls that I**
 20 **never made to a person who lied under oath. All**
 21 **right? And never to affect changes, a much broader**
 22 **effect. I was feeding homeless. I was --**
 23 Q. You used the money to feed homeless?
 24 **A. Hell yeah.**
 25 Q. Do you have receipts for that?

249

1 **A. I gave money to Syrian kids who had**
2 **populated the streets all over Istanbul who had no**
3 **fathers and no mothers and they were five to six**
4 **years old.**
5 Q. So you gave cash?
6 **A. I had to -- yeah.**
7 Q. How much cash did you take with you
8 to -- you said you were in Syria?
9 **A. I was in Istanbul when I gave things**
10 **out.**
11 Q. How much cash did you take with you on
12 that trip?
13 **A. I forgot what the legal amount is. I**
14 **took it to the max. Was it -- I forgot the amount.**
15 **Look it up. I have it written up**
16 **some -- somewhere.**
17 Q. What did you want Plaintiff to think
18 when you were telling her that you used the funds to
19 make things better to truly affect change?
20 **A. Once I can prove that we were having**
21 **conversations, I can then show that we were trying**
22 **to -- both of us, in my mind, to make things better.**
23 **Actually when I was with Plaintiff, we**
24 **literally got out of the car and fed homeless people**
25 **more than once. We gave them money.**

250

1 Q. Okay.
2 **A. Affecting change was raising social**
3 **consciousness. Affecting change was making people**
4 **aware that government is not necessarily your**
5 **friend.**
6 Q. So that's -- so that's how you're using
7 the funds she transferred you.
8 Now, let's -- tell us how exactly did
9 you use the bulk of her funds that she transferred
10 you.
11 **A. The bulk of the donation?**
12 Q. You can keep calling it a donation if
13 you like. We obviously think it was an investment.
14 We can call it a transfer of money.
15 **A. Okay.**
16 Q. And we can just say how did you use
17 that?
18 And we can look through your bank
19 statements one by one to show how it was used, but
20 tell us. Because I think you've responded in
21 discovery response.
22 How much money did you gamble away?
23 **A. A lot. I don't know.**
24 Q. A couple hundred thousand dollars?
25 **A. Yeah.**

251

1 Q. Maybe more?
2 **A. Yeah. Probably a little bit more, sure.**
3 Q. \$300,000?
4 **A. I don't know. I don't have an exact**
5 **amount.**
6 Q. Okay. Could it have been \$350,000 you
7 gambled away?
8 **A. No. I -- I don't know.**
9 Q. How do you not know?
10 **A. Just don't know. I didn't have one of**
11 **those casino cards.**
12 Q. Do you drink a lot when you gamble?
13 **A. I don't drink.**
14 Q. When did you have your last drink?
15 **A. I've had one glass of wine in the last**
16 **year. I just don't drink.**
17 Q. Which casinos did you gamble the money
18 away at?
19 **A. Cache Creek.**
20 Q. Okay. Where is that?
21 **A. That's near Santa Maria, California. I**
22 **forgot the name of that -- it's right near Solvang,**
23 **too. So you can -- you can pretty much check with**
24 **them, too. A lot of the checks that I cashed were**
25 **there.**

252

1 Q. What other casinos besides Cache Creek?
2 **A. That's it.**
3 Q. That's the only casino you gambled at --
4 **A. I only went to one other casino, and**
5 **that was with Plaintiff.**
6 Q. Okay. But can you tell us the name of a
7 person who works at Cache Creek Casino that saw you
8 gambling there?
9 **A. No.**
10 Q. Was there a pit boss that you know?
11 **A. No. Because I was at slots.**
12 Q. So you gambled away hundreds of
13 thousands of dollars playing slots?
14 **A. Yeah.**
15 Q. You didn't play any card games?
16 **A. No.**
17 Q. No craps?
18 **A. No.**
19 Q. Did the casino give you any benefits for
20 gambling away hundreds of thousands of dollars?
21 **A. I didn't use their card, because I**
22 **assume their card was tied in with a system with**
23 **international gaming systems. But, you know, I've**
24 **made --**
25 Q. And why were you afraid of that?

253

1 **A. Because I was an idiot to be a gambler.**
2 **It was an addiction.**
3 Q. How long did you know you had a gambling
4 addiction?
5 **A. I think really from last year. I didn't**
6 **expect it. I had won before in the past.**
7 Q. And when was that?
8 **A. Oh, god. 2004. I won at Horizons**
9 **\$25,000. Just never really got into it. But, you**
10 **know, this is what -- what happened.**
11 Q. So it's one casino Cache Creek?
12 **A. Yeah.**
13 Q. It's up to \$300,000, but you just don't
14 know.
15 Is there any way you can probably -- is
16 there any way you can check to find out exactly how
17 much you lost in gambling?
18 **A. I don't have a card that's a tracking**
19 **card, but what I could do is I could contact them**
20 **and, if I'm right, their ATM withdrawal is probably**
21 **tied into a whole system where you can look at**
22 **checks that were, you know, cashed there or cash**
23 **events.**
24 Q. And Solvang is the only casino with that
25 name and the only one you were at?

254

1 **A. Yeah.**
2 Q. Okay. Do you recall spending the money
3 on anything other than gambling?
4 **A. Hotels, food. I went to Europe and had**
5 **to pay bills, had to pay rent.**
6 Q. How much did you spent on lawyers? Do
7 you know?
8 **A. 10, 15, 20,000.**
9 Q. Is all the money gone now?
10 **A. Yeah.**
11 Q. You don't have any more left?
12 **A. No.**
13 Q. Okay. Are you paying your current
14 attorneys to represent you?
15 MR. PARMELEE: Objection.
16 MR. WITTENBERG: It's not
17 attorney-client privilege.
18 MR. PARMELEE: Well, that's what I'm
19 going to raise, but he can answer. I'm not going
20 to --
21 MR. WITTENBERG: It's not a
22 communication.
23 BY MR. WITTENBERG:
24 Q. Are you paying your current lawyers at
25 the Hayward firm?

255

1 **A. I have paid, but I owe.**
2 Q. Okay. And how much do you owe?
3 **A. He hasn't given me a figure yet.**
4 Q. Okay. Do you have money to pay your
5 current lawyers?
6 **A. No.**
7 Q. Do you have any assets to sell?
8 **A. I don't.**
9 Q. All your assets are sold already or
10 gone?
11 **A. I have got a keyboard.**
12 Q. What did you do with that piece of wood
13 that was worth \$100,000, according to you, that is a
14 Mozart floorboard?
15 **A. That is an asset and, yes, I do have**
16 **that.**
17 Q. Have you ever had it appraised?
18 **A. Yeah. It was appraised out of England.**
19 **There is actually a video on it from one person from**
20 **an auction house.**
21 Q. Okay. And what was the appraised value?
22 **A. He said, you know, that a small block of**
23 **it was worth 2,000 pounds. So I extrapolated that**
24 **from the size of it, so, you know --**
25 Q. So it's correct that you didn't put any

256

1 of the money into a business in exchange for
2 ownership of that business; is that right? I'm
3 being technical so we don't have to quibble over
4 words.
5 I would normally say it is correct you
6 didn't invest any of the money Plaintiff transferred
7 to you into a business for the future, correct?
8 **A. Oh, no. I did.**
9 Q. What's the name of that business?
10 **A. Sophia Musik.**
11 Q. Okay. How much money did you invest in
12 Sophia Musik?
13 **A. 30, 40, 50,000.**
14 Q. What did you do with the money you
15 invested in Sophia Musik?
16 **A. Expanded road music, had other**
17 **musicians, had video art.**
18 Q. One by one, did you use the money to pay
19 people?
20 **A. Yeah.**
21 Q. Or just yourself?
22 **A. Yeah.**
23 Q. You paid yourself?
24 **A. No. I paid --**
25 Q. Who did you pay?

257

1 **A. Costas, Christdoulou.**
2 Q. How much did you pay Costas?
3 **A. \$5,000, \$7,000.**
4 Q. What's Costas' contact information?
5 **A. I have tried to reach him. I cannot**
6 **find him. He's all over my YouTube, but I can't**
7 **find him.**
8 Q. Who else did you pay?
9 **A. Bogdan, B-o -- B-o-g-d-a-n, Scurtu,**
10 **S-c-u-r-t-u, and he's out of Rumania. You know --**
11 Q. How much did you pay him?
12 **A. A couple thousand, I guess.**
13 Q. Did you pay anybody else with the money
14 that Plaintiff transferred to you?
15 **A. Singers. You know, I had a lot of**
16 **people that --**
17 Q. How much in total?
18 **A. In total with all of it?**
19 Q. Yeah.
20 **A. Somewhere between \$25,000 and \$50,000**
21 **just on that. I had people who were doing SCO work.**
22 Q. Okay. Did you give any money to Brian
23 Weiner?
24 **A. Yeah.**
25 Q. How much?

258

1 **A. \$12,500.**
2 Q. Okay. So, let's look at the -- do you
3 have Exhibit 2 in front of you? The bank
4 statements.
5 **A. Yeah.**
6 Q. If you turn to Bates stamp, it's
7 TS 0091.
8 **A. Okay.**
9 Q. Now, you see here that the -- I think we
10 showed -- actually if we go -- it's the very first
11 page.
12 Did you ever gamble at the Chumash
13 Casino?
14 **A. That's Cache Creek.**
15 Q. That's the same one?
16 **A. That's Chumash.**
17 Q. At Chumash. It says the beginning
18 balance is \$175. And this is page TS 87. And then
19 it says that deposits and credits were \$487,000.
20 Now, we know that you received \$397,800
21 from Plaintiff on 6/23, according to TS 91.
22 **A. Uh-huh.**
23 Q. And then where did the remaining
24 \$100,000 come from that was -- roughly 90,000 that
25 was transferred into your account? What was the

259

1 source of that?
2 **A. That was when I had been getting rid of**
3 **assets, when I had been selling assets.**
4 Q. Do you know what you sold to get that?
5 **A. I think I sold a remaining stake in 18th**
6 **century objects that were said to be connected with**
7 **Hagenauer family.**
8 Q. You sold that, you said?
9 **A. Yeah.**
10 Q. Okay. Did -- was that part of a
11 business?
12 **A. Selling it?**
13 Q. Yeah. What was it? What did you sell?
14 **A. I sold objects that were connected with**
15 **the Hagenauer family. The Hagenauers were the --**
16 Q. What was the object?
17 **A. Huh?**
18 Q. What was the object?
19 **A. The objects were paintings, snuff boxes,**
20 **things from the 18th century.**
21 Q. Okay. And who did you sell that to?
22 **A. I sold it to Mr. Kazamine. Him and I**
23 **had gone in together. He said "I'll buy you out,"**
24 **because he --**
25 Q. Was this a business that bought it from

260

1 you?
2 **A. No. It was him personally.**
3 Q. Okay. Did he pay by check? Cash?
4 **A. He paid by wire.**
5 Q. Okay. And have you ever heard of the
6 name of the company Amadeus Investors L.L.C.?
7 **A. That was our thing. He set it up.**
8 Q. That was your thing?
9 **A. That was our thing.**
10 Q. A business you had with him?
11 **A. Yeah. But it's dissolved. It was an**
12 **L.L.C. and --**
13 Q. When did you set up that L.L.C.?
14 **A. 2005.**
15 Q. And you were a partner in that L.L.C.?
16 **A. Yeah.**
17 Q. And you neglected to tell us that
18 earlier when we went over the businesses you were
19 involved with.
20 Do you remember?
21 **A. I'm sorry.**
22 Q. Did you forget about it earlier or --
23 **A. Well, it's ten years ago and, you know,**
24 **I --**
25 Q. Well, you know, with all due respect,

261

1 Mr. Schoenberger, you got a \$90,000 from them,
 2 Amadeus Investors L.L.C., a little over a year ago.
 3 **A. Yes. But --**
 4 Q. This was your own business?
 5 **A. With a business like North Bay**
 6 **Entertainment or Telibaby those are businesses that**
 7 **made money.**
 8 **This thing never made money, you know.**
 9 **So I'm not trying to hide anything here. I'm**
 10 **basically saying this, you know, took all my time**
 11 **and never made me a dime, you know.**
 12 Q. Right. So, the money that we see here,
 13 it looks like if we go through these statements now,
 14 I can point them out to you. You have pretty big
 15 withdrawals. You want to go through them? There's
 16 a number of them that are checks.
 17 Did you bring -- did you keep a
 18 checkbook on this account?
 19 **A. I think I got loose checks with this**
 20 **one. I don't think that I got a regular check.**
 21 Q. Because, for example, on TS 96, you have
 22 a check 102 for \$25,000 and check 2003 for \$30,000.
 23 Did you ask your bank for these checks?
 24 **A. Yes. I'm sure I did.**
 25 Q. Okay. And did they give them to you?

262

1 **A. Yes. They would print them.**
 2 Q. So do you have them in your possession
 3 now?
 4 **A. The checks? No. These are ones that I**
 5 **would have --**
 6 Q. Have you contacted Wells Fargo during
 7 this litigation to say "Please give me the checks
 8 that" --
 9 Do you have a copy of check 1002 in the
 10 amount of \$25,000?
 11 **A. No.**
 12 Q. Okay. Why not?
 13 **A. Because I was given this (indicating).**
 14 **I was sent this. And I didn't hear anything back**
 15 **from -- from you. There was no discovery. And plus**
 16 **it costs a lot of money to go ahead and get copies**
 17 **of every single check.**
 18 Q. But you haven't -- just to be clear,
 19 you've never asked your bank for copies of the
 20 checks that are listed in your statements during
 21 this litigation at all?
 22 **A. No.**
 23 Q. Okay. And that's true for every single
 24 check 1002, 2003, 2004 in the amount of \$12,500, you
 25 don't know who they're written to, correct?

263

1 **A. 12,500 would be written to Brian --**
 2 **Brian Weiner.**
 3 Q. Well, you know who the one for \$25,000
 4 is written to, right?
 5 **A. No. I would assume that's probably for**
 6 **my car.**
 7 Q. You would assume. Do you own a car?
 8 Did you own a car?
 9 **A. I do own a car.**
 10 Q. What kind of car?
 11 **A. It's a Mercedes Benz 2008.**
 12 Q. When did you buy that?
 13 **A. November 2014.**
 14 Q. Okay. And did you use Plaintiff's money
 15 to buy your car?
 16 **A. I'm trying to think of the actual date**
 17 **when I got -- it might have been late October. And**
 18 **I could have very well used the last of that**
 19 **\$90,000. So, you know --**
 20 Q. Okay. So what year was it? 2008
 21 Mercedes?
 22 **A. Yeah.**
 23 Q. What kind?
 24 **A. It's a CLS 550.**
 25 Q. Okay.

264

1 **A. I had had a car crash on the --**
 2 **October 18th, totaled my car. So I got an insurance**
 3 **check from my insurance company, and I bought**
 4 **another car.**
 5 Q. On TS 98 you have amount check 1003 in
 6 the amount of \$25,000.
 7 Do you know who that was made to?
 8 **A. I don't.**
 9 Q. On TS 99 on 7/24 you have a withdrawal
 10 made in the branch much of \$9500.
 11 And that was just cash you took out?
 12 **A. Yeah. What date was that?**
 13 Q. TS 99, 7/24.
 14 Is that just for gambling purposes?
 15 **A. No. Not necessarily. It was probably**
 16 **for money purposes, because I was expecting**
 17 **Plaintiff to arrive.**
 18 Q. Okay.
 19 MR. WITTENBERG: We'll ask you to
 20 contact the bank, get us these checks, because he's
 21 never done it. Okay? And you can hopefully not
 22 make a big deal of it. Just get copies.
 23 THE WITNESS: Do you want a copy of
 24 every single check including the \$5 and \$10 ones?
 25 ///

265

1 BY MR. WITTENBERG:
 2 Q. Well, we've asked you for that before.
 3 And you can get copies of checks pretty easily.
 4 Do you have online banking?
 5 A. No.
 6 Q. Have you ever used online banking?
 7 A. Yes. But I won't.
 8 Q. Okay.
 9 A. As I said, with the May hack, it was
 10 such a bad hack that they literally had to change my
 11 account, because someone fraudulently tried to get
 12 into my account and prompt a password.
 13 Q. Okay. Let's move on to the next exhibit
 14 and mark this -- I think it is 7 or 8.
 15 MR. PARMELEE: It's 7.
 16 THE REPORTER: Correct.
 17 MR. WITTENBERG: Exhibit 7, please.
 18 (Whereupon the document referred
 19 to was marked Plaintiff's
 20 Exhibit 7 by the Certified
 21 Shorthand Reporter and is attached
 22 hereto.)
 23 BY MR. WITTENBERG:
 24 Q. Let me know when you're ready,
 25 Mr. Schoenberger.

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1 Let me know when you're ready,
 2 Mr. Schoenberger.
 3 A. It's just 52 column inches, so I want to
 4 look through it.
 5 Q. Okay.
 6 A. I'm ready.
 7 Q. Okay. We're going to start just with
 8 August 24th on page two of four.
 9 You see an August 24th 10:57 A.M. email
 10 from Isabelle to you -- Isabelle the Plaintiff to
 11 you.
 12 Do you see that?
 13 A. Yes.
 14 Q. She goes on about being heart broken,
 15 but clearly one, two, three, four, five -- six down
 16 she says that she offered you her true love,
 17 believed in you and invested in your projects.
 18 You understood that she always was
 19 making an investment in the projects, business,
 20 right?
 21 A. She was investing in me.
 22 Q. Okay. Not your projects? Just you?
 23 A. My projects are me.
 24 Q. Okay. And so according to you, she made
 25 an investment in you to gamble away \$300,000 of the

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1 \$400,000? Is that what you're saying?
 2 A. No.
 3 Q. Okay. Then what did she invest in?
 4 A. The \$300,000 that you mentioned is -- I
 5 have no way of ascertaining whether it's even close.
 6 But it was in music and the message and where I
 7 wanted to go with things and in a project called
 8 Oasis, which I had dreamed for her to be in charge
 9 and which she stopped.
 10 I didn't walk away from that project,
 11 you know.
 12 Q. Okay. As you go, you know, to the next
 13 page, you see in the middle one, two, three, four,
 14 five -- six down it says,
 15 "Oasis is a worthy project. Let's
 16 maintain a business relationship
 17 for the sake of it, shall we."
 18 See that.
 19 A. Yep.
 20 Q. Okay. And she goes on to ask you for
 21 contact lists of everybody involved in relation to
 22 Oasis.
 23 You see that?
 24 A. Yep.
 25 Q. And she asks you for a list of the

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1 businesses that she's involved with so that she can
 2 forward it to her accountant any revenue generated
 3 by those.
 4 Do you see that?
 5 A. Yes.
 6 Q. Okay. Did you ever provide her with a
 7 list in response to any of those requests?
 8 A. My response to her was in a phone call.
 9 And I think my phone records -- after this one, a
 10 phone call that she didn't pick up.
 11 So I was aware by the tone of the email
 12 that things had completely changed, that -- when she
 13 talked about a donation. And this is from the 26th.
 14 Q. Okay. Let me focus you in.
 15 A. Okay.
 16 Q. If you look at the first page of this
 17 one of four, it's an email from you to Plaintiff,
 18 correct?
 19 A. Yes. On the 26th of August.
 20 Q. Right. And it's at 7:43 IST.
 21 A. Yeah.
 22 Q. And that's after the one that we just
 23 discussed, correct, where she wrote to you that
 24 she's heartbroken?
 25 A. Yeah.

269

1 Q. So this is your response to that email;
 2 isn't that true?
 3 A. Yeah.
 4 Q. It wasn't by phone. I was by email
 5 right here, correct?
 6 A. Yeah.
 7 Q. And as you see, you write that,
 8 "As far as Oasis, it will be hit."
 9 What did you mean by that?
 10 A. At this point I had figured it was going
 11 to be all about music too. Because --
 12 Q. So Oasis wasn't -- when you say "it
 13 would be hit," it was never -- it wasn't started
 14 yet, right? It was no formed company?
 15 A. No.
 16 Q. No, there -- I'm correct there was
 17 nothing formed, right?
 18 A. We were in the process of trying to form
 19 it.
 20 Q. But nothing was formed?
 21 A. No.
 22 Q. And you say down -- if we go one, two,
 23 three, four, five -- six,
 24 "But if you want" -- "but if you do
 25 not want us as a couple, then let's

270

1 keep it business, and I will simply
 2 do the work."
 3 A. Yeah.
 4 Q. So again, and this is August 26th,
 5 months after money was transferred, you're
 6 discussing that you're going to stay in business
 7 together because that was certainly part of the
 8 relationship you had, right?
 9 A. What was -- yes. What was meant by this
 10 is I would do the work to build out Oasis. I had
 11 not -- I was not cognizant that she had already
 12 called Brian right around that time and basically
 13 damaged my reputation.
 14 Q. Well, that's because, you know, you
 15 haven't heard Plaintiff's side of that story, right?
 16 Okay. So that may not have happened,
 17 right?
 18 Okay. So if we look here, it says,
 19 "Let's keep it business."
 20 And you're responding to her saying
 21 let's maintain a business relationship, right.
 22 A. (No audible response.)
 23 Q. And that matches up.
 24 A. I even offered to donate 50 percent of
 25 my music.

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1 Q. So when you say "you will own 50 percent
 2 of your music," what do you -- did she ever own --
 3 did you transfer ownership to her of 50 percent of
 4 your music?
 5 A. No. I said "you can." And then -- you
 6 can't find -- I couldn't get ahold of her.
 7 Q. Okay. But you're emailing her here, so
 8 you knew how to email her, right?
 9 A. And I tried emailing her after.
 10 Q. You said you called her?
 11 A. And I called her.
 12 Q. And you spoke to her.
 13 But now you're telling us you couldn't
 14 get ahold of her?
 15 A. We were in the middle of a tiff here.
 16 And then I had plans to meet her in Europe on
 17 September 8th in Amsterdam.
 18 Q. Okay.
 19 A. I think Plaintiff can -- can quantify
 20 that.
 21 Q. You even go down below and you say, the
 22 second line here in this paragraph,
 23 "If you wish to be strictly
 24 business, then that's fine."
 25 So you were going to continue on with

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1 the business relationship.
 2 And as to this point, you were telling
 3 her you had invested her monies, and that's why
 4 she's asking for it here on this email, saying
 5 "Please give me a list of how you invested the money
 6 so I can have my accountant keep track of it,"
 7 right?
 8 A. Yeah.
 9 Q. Okay. You wanted her to think that's
 10 what you were doing with the money, right?
 11 A. "Oasis, a project dear to my heart,
 12 something we could build together,
 13 we barely even discussed when we
 14 were together."
 15 If you please take a look at the last --
 16 or the next to the last paragraph on page two.
 17 So you can see we barely even discussed
 18 when we were together.
 19 I was trying to get this thing off the
 20 ground, Mr. Wittenberg.
 21 Q. Okay.
 22 A. That's what I wanted.
 23 Q. You didn't actually take any steps to do
 24 it, did you?
 25 A. I was taking enormous steps. The vision

273

1 that I considered for Oasis would be -- the views
 2 and the subscribers that we had with YouTube could
 3 be funneled into a larger thing where we would have
 4 a network that would pair up directors and producers
 5 with talent. This was going to be a cyber salon.
 6 And I think it would have been wonderful.
 7 But, you know, we needed your Plaintiff.
 8 She's the one --
 9 Q. Okay. Does your music have value?
 10 When you say you're going to show on
 11 50 percent of your music, what music are you talking
 12 about?
 13 A. Sure it has value.
 14 Q. What is it worth?
 15 A. There's no -- it has value as soon as it
 16 places. So it's kind of like a gymnast before it's
 17 won a gold medal. It's in the potential.
 18 But are you saying does it have current
 19 monetary value?
 20 Q. Yes.
 21 MR. PARMELEE: Objection. Asks for
 22 expert opinion.
 23 But you can answer.
 24 THE WITNESS: I hope and I think that I
 25 give people pleasure from my music.

274

1 BY MR. WITTENBERG:
 2 Q. And why didn't you ever transfer
 3 50 percent of your music to Plaintiff?
 4 A. Because she wouldn't talk to me. And
 5 then in November she served me.
 6 And as -- as I stand right now, and I'm
 7 under no obligation, I give her 50 percent of my
 8 music right now.
 9 Q. Okay.
 10 A. I hope you got that for the record, too.
 11 Q. Okay. And you'll sign over a document
 12 stating that?
 13 A. Yeah.
 14 Q. And your attorney and I can arrange
 15 that?
 16 A. Yes.
 17 Q. Okay. And whatever value you have to
 18 any of your music that you've created in the past or
 19 in the future, you will ensure that Plaintiff gets
 20 her money back plus interest, correct?
 21 A. Plus interest?
 22 Q. Well, seven-percent interest. Is that
 23 fair?
 24 A. We -- I can discuss an even 50 percent
 25 of my music. I don't want to get into the interest

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1 aspect. But I'd be happy to give her 50 percent of
 2 my publishing for my music, absolutely.
 3 Q. 50 percent of all ownership that you
 4 have --
 5 Do you have 100 percent ownership right
 6 now?
 7 A. Yeah. Of my music, yeah.
 8 Q. So you'll create a list. We'll work on
 9 this afterwards, all right?
 10 A. Yeah.
 11 Q. We can get this done maybe in the next
 12 few weeks.
 13 Is that all right?
 14 A. Yeah.
 15 Q. Does it have any -- again you didn't
 16 answer the question.
 17 Does it have any current value as far as
 18 you know?
 19 A. Mr. Wittenberg, let me kind of -- you'll
 20 want to take this time to hear me out. Okay?
 21 I think everyone will, including the
 22 Plaintiff.
 23 The person that I'm working with right
 24 now, Michael Levine, made \$1 million a year on his
 25 music writing for "Cold Case."

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1 There can be huge money in music. He
 2 has worked for seven years with Hans Zimmer. Hans
 3 Zimmer is worth \$90 million from his music.
 4 And as I said, I'm absolutely willing to
 5 give Plaintiff 50 percent of my music, because it
 6 came out of my mouth.
 7 Q. Okay.
 8 MR. WITTENBERG: We'll mark this as
 9 Exhibit 8.
 10 (Whereupon the document referred
 11 to was marked Plaintiff's
 12 Exhibit 8 by the Certified
 13 Shorthand Reporter and is attached
 14 hereto.)
 15 BY MR. WITTENBERG:
 16 Q. Okay. Have you ever been poisoned,
 17 Mr. Schoenberger?
 18 A. I'm not quite sure what you mean by
 19 "poisoned."
 20 Q. Have you ever had poison in your body?
 21 A. I have a condition.
 22 Q. Okay. What is that?
 23 A. It's called porphyria.
 24 Q. And what does that mean?
 25 A. It means that I cannot be in the sun or

277

1 **I break out and I bleed.**
 2 Q. Okay. Is that -- is that your way of
 3 telling us that's poison?
 4 **A. Well, one can consider that a poisoning,**
 5 **yeah.**
 6 Q. Okay.
 7 **A. It's a blood disorder.**
 8 Q. Other than that, have you ever been
 9 poisoned?
 10 **A. Well, I think we all have. I mean**
 11 **anytime you have E. coli or Salmonella or, you know,**
 12 **you eat a bad piece of fruit or a bad piece of meat,**
 13 **that's poisoning.**
 14 Q. Other than that, you have no
 15 recollection of ever having poison in your body?
 16 **A. Well, once again, I think anybody --**
 17 **okay. I don't drink, but anybody who's gotten drunk**
 18 **has alcohol poisoning.**
 19 Q. Did you ever tell Plaintiff that you
 20 were suffering from poisoning?
 21 **A. I told her I suspected it, yeah.**
 22 Q. What was that poisoning from?
 23 **A. I assumed it was from Steve Leflar.**
 24 Q. Okay. And what was it called, the
 25 poison?

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1 **A. I didn't have a name for it. I had**
 2 **looked up the symptoms. I had looked --**
 3 Q. Do you know the word "dioxin"?
 4 **A. Yeah.**
 5 Q. Did you ever tell her you were poisoned
 6 with dioxin?
 7 **A. Steve Leflar had called me up --**
 8 Q. Did you ever tell Plaintiff that you
 9 were poisoned with dioxin?
 10 **A. I told her I suspected I was poisoned**
 11 **with it. Steve Leflar had made a specific threat to**
 12 **me that that's what he did.**
 13 Q. Okay. So, did you ever go to the doctor
 14 for that suspicion of being poisoned with dioxin?
 15 **A. I don't trust doctors.**
 16 Q. So you did not go to the doctor? Is
 17 that your answer?
 18 **A. I -- I ended up in the hospital in the**
 19 **final week of December 2000. The hospital was --**
 20 Q. 2000, the year 2000?
 21 **A. Yeah. Possible --**
 22 Q. What about in the year 2014?
 23 **A. I had received a -- multiple threats**
 24 **from Steve Leflar, and he had -- he had basically**
 25 **said, "I poisoned you and you don't even know it."**

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1 **He then put a video up on YouTube where**
 2 **he had had --**
 3 Q. Did you go to the doctor in 2014 for
 4 dioxin poisoning?
 5 **A. Did I?**
 6 Q. Yeah.
 7 **A. Didn't go for specifically that. I said**
 8 **"What do you think's happening with me?"**
 9 Q. Did anybody diagnose you with dioxin
 10 poisoning?
 11 **A. No.**
 12 Q. Okay. Anytime prior to 2014 were you
 13 ever diagnosed with dioxin poisoning?
 14 **A. I had suspected, but, no. I had not had**
 15 **that.**
 16 Q. You were never diagnosed with it,
 17 correct?
 18 **A. No.**
 19 Q. All right. Let's look at the Exhibit 8
 20 I just handed you.
 21 If we look -- let's start out at page 38
 22 toward the back.
 23 Now, earlier today you testified you
 24 never went to Iraq, correct?
 25 **A. Yes.**

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1 Q. So it is correct that you were never in
 2 Iraq, right?
 3 **A. Yes.**
 4 Q. Okay. Do you see here on the top of --
 5 well, let's start -- it's actually the bottom of 37.
 6 You see here on September 2, 2014 at
 7 7:56 you write,
 8 "I am off to Iraq. I love you."
 9 There you're telling --
 10 **A. On page seven?**
 11 Q. No. On page 37 at the very bottom to
 12 page 38 at the very top.
 13 **A. Yeah.**
 14 Q. So you're telling Plaintiff that you're
 15 off to Iraq, right?
 16 **A. Yeah.**
 17 Q. But you never went, right?
 18 **A. No. I was in the Middle East, though.**
 19 Q. Did you ever go to Syria?
 20 **A. I think that I answered earlier that I**
 21 **was right where Köy Kobanê was, so I was -- I**
 22 **believe I stepped into Syrian territory.**
 23 Q. That was in September of 2014?
 24 **A. Yes.**
 25 Q. The only time you were ever there?

281	<p>1 A. Yes.</p> <p>2 Q. Were you ever in the Middle East other</p> <p>3 than that time?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. When?</p> <p>6 A. 2012.</p> <p>7 Q. Where did you go?</p> <p>8 A. Oman, United -- well, the UAE.</p> <p>9 Q. Okay. You see on page 37 here above</p> <p>10 where we looked at before is -- Plaintiff gets back</p> <p>11 to you on September 2nd and says,</p> <p>12 "Perhaps you can arrange a meeting</p> <p>13 when you're back from Iraq."</p> <p>14 You wanted her to think you were going</p> <p>15 to Iraq, right?</p> <p>16 A. No. I had planned to go to Iraq.</p> <p>17 Q. Okay. Then you see you've got a</p> <p>18 September 3rd email at 6:37 where you tell Plaintiff</p> <p>19 you only have four days and then you're in Mosul,</p> <p>20 Iraq, where you will die.</p> <p>21 Why did you tell her you're going to die</p> <p>22 there?</p> <p>23 A. I felt that Mosul was about to fall into</p> <p>24 ISIS hands, and it ended up being in ISIS hands. So</p> <p>25 I was trying to warn her.</p>	283	<p>1 contact number that can confirm that we had meetings</p> <p>2 in Istanbul before he went to Köy Kobanê and that we</p> <p>3 talked specifically about this.</p> <p>4 Q. Do you see at the top of page 37 in the</p> <p>5 third full paragraph -- this is an email from</p> <p>6 Plaintiff to you, and she mentions a shared account.</p> <p>7 Did you ever have a shared account with</p> <p>8 Plaintiff, bank account?</p> <p>9 A. Yeah. I set up one with \$5,000. And</p> <p>10 then when I went to look for it, couldn't find it.</p> <p>11 So I figured she had done something with it.</p> <p>12 Q. You didn't have -- you don't have any</p> <p>13 information on that account?</p> <p>14 A. I have nothing. I know that it was set</p> <p>15 up in Woodland Hills and it was at Wells Fargo, but</p> <p>16 it was not the one next to St. Mel's. But it's the</p> <p>17 one on Ventura Boulevard.</p> <p>18 And we had both walked in together and a</p> <p>19 Persian lady who liked Plaintiff very much was the</p> <p>20 one who helped us set it up. That's my</p> <p>21 recollection.</p> <p>22 Q. Why didn't you disclose that bank</p> <p>23 account in the discovery process here and tell your</p> <p>24 lawyer about it?</p> <p>25 A. I -- because when I went there they said</p>
282	<p>1 We had frequent conversations that they</p> <p>2 were going to be taking down large cities, and the</p> <p>3 next thing they were going to go for was Aleppo and</p> <p>4 ultimately Damascus and then Istanbul.</p> <p>5 So it was about a metastasizing evil.</p> <p>6 Q. And you were going voluntarily on your</p> <p>7 own? You wanted to go?</p> <p>8 A. Yeah.</p> <p>9 Q. Not because the Government was sending</p> <p>10 you?</p> <p>11 A. No. I had -- I had contact with Kurdish</p> <p>12 rebels, and the idea was to create something that</p> <p>13 would stop what just happened in Paris.</p> <p>14 Q. Did you have emails with the Kurdish</p> <p>15 rebels?</p> <p>16 A. Yeah. I -- I actually -- I can find</p> <p>17 something on my computer, Mr. Wittenberg, that one</p> <p>18 of the people that I met with can confirm with you</p> <p>19 that we met. And his partner is one of the leaders</p> <p>20 of the Kurdish resistance.</p> <p>21 It's a sensitive thing. And all that I</p> <p>22 ask is I'm happy to give it to you, but you have to</p> <p>23 understand that under Erdogan, he's now killing</p> <p>24 Kurds on a regular basis.</p> <p>25 But I'm happy to supply you with a</p>	284	<p>1 it didn't exist. So I had assumed that Plaintiff</p> <p>2 had simply said "I don't want anything to do with</p> <p>3 this. Take my name off of it."</p> <p>4 Q. So you set up the account and then they</p> <p>5 were telling you --</p> <p>6 A. We set it up, and then I went --</p> <p>7 Q. But you didn't tell anybody -- you</p> <p>8 didn't produce any information or disclose it in</p> <p>9 this litigation, right?</p> <p>10 A. No. She actually had the -- the actual</p> <p>11 card to it. I had no access to it. But it was -- I</p> <p>12 do remember it was on the same day that she bought a</p> <p>13 cell phone and other things.</p> <p>14 Q. Do you remember threatening</p> <p>15 Plaintiff's -- to kill Plaintiff's dog?</p> <p>16 A. I never would.</p> <p>17 Q. Okay.</p> <p>18 A. Kill Plaintiff's dog?</p> <p>19 Q. Do you remember -- did you ever tell</p> <p>20 Plaintiff you bought her a car?</p> <p>21 A. I don't remember.</p> <p>22 Q. So it's possible that you did?</p> <p>23 A. I was about to buy her a car.</p> <p>24 Q. Did you ever buy her a car?</p> <p>25 A. No. Because she --</p>

THOMAS SCHOENBERGER
December 1, 2015

72 (Pages 285 to 288)

<p style="text-align: right;">285</p> <p>1 Q. But you told her you did buy her a car? 2 Let's start over. 3 Do you remember telling Plaintiff you 4 bought her a car? 5 A. I don't remember. 6 Q. Okay. If you look at page 38 -- 7 A. Yep. 8 Q. -- this is an email you wrote on 9 August 29th at 7:46 P.M. 10 A. "You gift me a large amount of 11 money and with" -- 12 Is that -- where? 13 MR. PARMELEE: 38. 14 BY MR. WITTENBERG: 15 Q. If you keep going down and you go to the 16 last paragraph it says, 17 "I bought you a car." 18 So you never bought her a car, but 19 you're saying you did, correct? 20 A. Oh, that -- this is where I was going to 21 go get something different. I was going to give her 22 my car or I was looking at a Mini Cooper, because 23 she loved all these Mini Coopers that were going 24 around. 25 So I probably just mistyped --</p>	<p style="text-align: right;">287</p> <p>1 Where are you looking? 2 A. I'm looking at the big thick one. 3 Q. You're not looking at page 39. You're 4 looking at page ten. 5 A. Yeah. I'm sorry. And this even 6 qualifies, 7 "I went to the bank to put money in 8 our account. You closed it. Why?" 9 That's why it wasn't revealed to you. 10 We weren't trying to pull any wool. 11 Q. Okay. But you didn't produce this email 12 in this litigation, did you? 13 Why not? 14 It's after the time you said that your 15 emails were hacked. It's from the same -- 16 Earlier you didn't even mention you have 17 an email thomasschoenbergersong@gmail. 18 Why didn't you disclose that to you? 19 A. I thought I did. 20 Okay. Thomasschoenbergersong is 21 probably another one that I was using -- 22 Q. You set up a lot of emails from time to 23 time, don't you? 24 A. The only emails were 25 thomasschoenbergmusik and now I look at</p>
<p style="text-align: right;">286</p> <p>1 Q. Okay. So you never bought her a car, 2 but you said you did? 3 A. No, I didn't. 4 Q. Okay. 5 A. Oh, and here -- here's the thing, sir. 6 On page 39 it's where I write to her, 7 "I went to the bank to put more 8 money in your account. You closed 9 it. Why?" 10 So this kind of shows the time line. 11 Do you see that? 12 Q. I do. At 7:46, right? 13 Because the email we were looking at 14 before -- 15 A. Well, on the 3rd of September -- 16 Q. -- is exactly the same -- is exactly the 17 same email. 18 A. Well, this one is September 3rd, and 19 it's me writing to her, 20 "I went to the bank to put more 21 money in" -- 22 Q. Are you looking at page 39? 23 A. Yes. 24 Q. I'm looking at page 39 and I have Friday 25 August 29, 2014.</p>	<p style="text-align: right;">288</p> <p>1 thomasschoenbergersong and -- 2 Q. When did you create 3 thomasschoenbergersong? 4 A. It must have been right around this 5 time, you know. 6 Q. It could have been earlier, though, 7 right? 8 For all we know it could have been 2000? 9 A. I know -- well, I don't think so. And 10 all I can tell you is I haven't had access to either 11 or used either since May. But here's what I can 12 tell -- 13 Q. Well, you have used 14 thomasschoenbergersong after May 20 -- I'm sorry. 15 This is earlier. This is a year ago. 16 But this is a different email. 17 How did this one get hacked? 18 A. They -- 19 Q. Both -- every email you've ever used was 20 hacked? 21 A. They went into my email account, they 22 went into my Facebook account, they went into 23 Linda's. 24 Linda had to be on the phone with Apple. 25 They ended up taking Linda Barrett and putting the</p>

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1 picture of a gravestone on her Facebook. They were
 2 taking emails out. They were sending things from
 3 one person to another. It's called a malicious RAT
 4 attack. "RAT" stands for remote access tool. So it
 5 was pretty brutal.
 6 Q. Okay.
 7 A. And if you -- if you need,
 8 Mr. Wittenberg, she can call Apple and --
 9 Q. Well, let's look at page one of this
 10 Exhibit 8.
 11 Okay?
 12 A. Okay.
 13 Q. On August 30, 2014 you write to
 14 Plaintiff saying on this third paragraph down -- I'm
 15 sorry, fourth paragraph down,
 16 "I did not take a penny from the
 17 account I set up for you."
 18 So, which account are you referring to
 19 here?
 20 A. The account where we had put in \$5,000,
 21 \$10,000, whatever it was. That was the one where we
 22 were both on.
 23 Q. It's your testimony that Plaintiff took
 24 that money out?
 25 A. I can't say that.

290

1 Q. Okay.
 2 A. They -- she could have literally --
 3 Q. You didn't take the money out yourself?
 4 A. No.
 5 Q. You didn't use it --
 6 A. No.
 7 Q. -- cash at the ATM, you didn't take the
 8 money out?
 9 A. No. My assumption is if she said "I
 10 didn't want to be on the account," the account goes
 11 away and it reverts back to whatever is there.
 12 So I'm not making any --
 13 Q. Is it true that you're angry that things
 14 didn't go well with Plaintiff when she was here
 15 visiting in July, August 2014?
 16 A. No. I'm not angry. I think -- I think
 17 she's great. I think that she's as amazing human
 18 being in many ways.
 19 Q. Was it -- were you offended the way it
 20 worked out?
 21 A. No. No. I'm -- I feel embarrassed that
 22 I have a gambling problem.
 23 But even more than that, I feel
 24 embarrassed that things that I expected would go
 25 well, it's like everything that I touch just turned

291

1 to hell.
 2 Do I have any anger towards her? No.
 3 Q. Resentment?
 4 A. No.
 5 Q. You were offended for a time, though,
 6 weren't you?
 7 A. No.
 8 Q. You were never offended?
 9 A. (No audible response.)
 10 Q. Why did you use the word,
 11 "I got offended when I declared you
 12 to be my soul mate but you did not
 13 respond in kind"?
 14 A. That's offended by a sentence rather
 15 than -- you're saying offended by -- when it didn't
 16 work out for us.
 17 Q. That you declared her your soul mate but
 18 she did not respond in kind. That means you were
 19 offended. You write it right here.
 20 But now you're disavowing her a year
 21 later.
 22 Why are you disavowing her?
 23 A. She also hurled a suitcase out the
 24 window of the Warner --
 25 Q. Well, that's what you say.

292

1 But we're talking about why -- you just
 2 told us you weren't offended at the time this
 3 happened, right around the time you started telling
 4 her that it was a gift of the money, that you're
 5 offended that she didn't return this soul mate
 6 declaration that you gave to her.
 7 So it's more likely isn't it,
 8 Mr. Schoenberger, that you stopped telling her --
 9 started telling her that's a gift and it's my money
 10 because you're offended by the way things worked out
 11 when she was here?
 12 A. Mr. Wittenberg, I think I have something
 13 that will really help with our communication.
 14 You know, I think you're -- you're a
 15 good lawyer. When I say I was offended, I was
 16 offended at that sentence at that time.
 17 When you ask me now if I'm offended, no.
 18 I actually only wish her well. And at this meeting
 19 I've offered to give 50 percent of my music.
 20 I don't want her as an enemy. If I end
 21 up making, you know, a ton of money, I'm hoping that
 22 she's open to -- to me reaching out to her and
 23 gifting her one of these days, you know.
 24 I'm not -- I'm not resentful. I wish
 25 her well. I wish her happiness. I was disappointed

293

1 **in the way that things worked out.**
 2 **But in no way did I ever threaten to**
 3 **kill her dog. That's ridiculous. In no way would I**
 4 **ever hurt her. In no way would I --**
 5 Q. Let's look at page 24 of this loan --
 6 Exhibit 8, just another example.
 7 **A. Sure.**
 8 Q. If you look at your email August 31,
 9 2014 at 6:37 P.M., you write to Plaintiff in
 10 different fonts.
 11 Why are you writing in small fonts and
 12 then you're writing in large cap, all cap fonts?
 13 Can you tell us that?
 14 MR. PARMELEE: You said page 24?
 15 MR. WITTENBERG: 24 of 39.
 16 BY MR. WITTENBERG:
 17 Q. And the email is on Sunday, August 31 at
 18 6:37 P.M.
 19 **A. I don't understand why I would do big**
 20 **ones or small ones. You're talking about here where**
 21 **it says,**
 22 **"You say this. Remember, you left**
 23 **me in a hotel room, you left me in**
 24 **a rush. I don't understand that."**
 25 Q. Okay. Well, let's look. I mean are you

294

1 writing here -- let's see, you got the all caps, and
 2 then you keep going down, you've got small caps. It
 3 says,
 4 "I bought you a car."
 5 Again is that you writing "I bought you
 6 a car" here two days later?
 7 Do you know what's going on? Did you
 8 write this?
 9 **A. Is this through -- okay. Then here we**
 10 **go. You know what, this is probably through my**
 11 **gmail which is connected with my cell phone. So of**
 12 **course it could definitely mean I bought you a car**
 13 **or I mean to buy you a car.**
 14 Q. Okay. So it's something you wrote.
 15 So underneath the all caps you say,
 16 "Can you please tell me where you
 17 are. I crashed the car."
 18 Do you remember crashing the car.
 19 **A. Yeah.**
 20 Q. So you were driving the car, you crashed
 21 it?
 22 **A. Yeah.**
 23 Q. Okay. And which car was this?
 24 **A. This was a Mercedes.**
 25 Q. Okay. You crashed the car.

295

1 Was there a police report made?
 2 **A. It didn't do enough damage.**
 3 Q. Okay. So you crashed the car but you
 4 kept driving, no report made, no evidence of the
 5 crash?
 6 **A. Yeah. I had -- I hit a concrete bumper.**
 7 **There was --**
 8 Q. You say,
 9 "Someone tried to kill me."
 10 Right?
 11 You felt like at the time someone was
 12 trying to kill you; is that right.
 13 **A. Yeah. It was because someone had been**
 14 **texting. I didn't mean someone is purposely trying**
 15 **to kill me. There was a lot of weird stuff going**
 16 **on.**
 17 Q. But then you go on, Mr. Schoenberger,
 18 and say,
 19 "I'm hoping to give you all
 20 business info once we sort this
 21 out."
 22 So you're holding it over -- you're
 23 holding this business info over her heard, aren't
 24 you, saying --
 25 **A. No. The business info is where are we**

296

1 **going to go with the music. This was what our**
 2 **business conversation was at the time.**
 3 **She was saying "How do you plan to place**
 4 **your music? What are you going to do with it?"**
 5 **And that's why later in the sentence I**
 6 **said I'm willing to give you, you know, 50 percent.**
 7 **I'm willing to -- open to splitting proceeds from**
 8 **all my music with you.**
 9 Q. Then you say,
 10 "Damn it, I said you were my wife."
 11 **A. Yeah.**
 12 Q. She was never your wife, were you?
 13 Were you suffering from any kind of
 14 mental illness at this time?
 15 **A. I think you might want to ask your**
 16 **Plaintiff. We had a private --**
 17 Q. I want to ask you, were you seeing a
 18 therapist during this time?
 19 **A. No.**
 20 Q. Have you ever seen a therapist for
 21 mental issues?
 22 **A. No.**
 23 Q. Did you believe that Ms. Gauthier
 24 Plaintiff was your wife?
 25 **A. No.**

297

1 Q. Okay. Did you have business info that
2 you could give her?

3 **A. I was trying to explain to her what
4 music publishing was. I planned to spend a whole --**

5 Q. When I says "I'm open to give you all
6 business info," isn't that the info she requested
7 earlier about getting records from investments you
8 made and businesses that you've placed money into?

9 **A. Absolutely not. This was specific to
10 what could you do, how much money can you make with
11 music, which is why in the same paragraph I put down
12 I'm willing to put my music proceeds.**

13 Q. Okay. If you turn to page 25 --

14 Mr. Schoenberger, I understand you're in
15 the room with Plaintiff. Try not to, if you will,
16 inflame anything by making gestures to Plaintiff.
17 Please look at me or your attorney and avoid looking
18 at Plaintiff with the kind of look you just gave
19 her.

20 **A. Okay. Sir, what kind of look did I just
21 give her?**

22 Q. It was something that I thought was
23 intended to inflame. And I'm asking you to just
24 please don't look at Plaintiff anymore?

25 **A. I'm happy not --**

298

1 Q. If you can, please control yourself and
2 just look at me or your -- or your counsel.

3 **A. Okay. And, sir --**

4 Q. Before we go too far afield, I just said
5 to you the business info being requested was info
6 relating to investments.

7 And you said absolutely not, correct?

8 **A. I said in the paragraph it -- that
9 particular one in small caps has to do with music
10 proceeds.**

11 Q. Music proceeds?

12 **A. Yeah.**

13 Q. And it says,
14 "Business info once we sort this
15 out."
16 Now, the email you're responding to
17 below on page 24 which goes to page 25 is what
18 you're responding to from Plaintiff's email and it
19 says,
20 "You say you agree to a business
21 relationship yet refuse me and deny
22 me access to any relevant info
23 whatsoever."
24 So clearly your interpretation today is
25 far different from what was happening back at the

299

1 time the events were unfolding; isn't that true,
2 Mr. Schoenberger?

3 **A. And this is where you allege that there
4 was no suitcases thrown out of a window by
5 Ms. Gauthier when there is a record.**

6 Q. I understand you're trying to change the
7 topic. I understand you don't want to address that.
8 You are talking about and responding by
9 saying,
10 "You can get business info once we
11 sort this out."
12 Meaning you have it, right? But you're
13 not going to give it to her until you're ready to,
14 if ever, in response to her request to you saying
15 "You're denying me access to any relevant info about
16 the business whatsoever" in your business
17 relationship.

18 **A. But --**

19 Q. Why are you ignoring that once again
20 instead of just telling us the truth?

21 **A. I think that she wrote the truth when
22 she said,
23 "We had three weeks together and
24 really didn't do a lot with Oasis."
25 That was her previous statement. And I**

300

1 **agree with it.**

2 Q. Okay. So several times she asked you
3 for paperwork regarding the investments, and you
4 never gave her any; is that correct?

5 **A. She asked for absolutely nothing until
6 she threw me out of the hotel room. She never asked
7 for anything --**

8 Q. I mean we're just talking here --

9 **A. Yeah.**

10 Q. We're showing you one time here at least
11 on page 25, which is an August email, August 30,
12 she's asking you for paperwork for the investments
13 in your business relationship.

14 **A. On what page?**

15 Q. 25. I just showed you the language.
16 I'll point it out again. It goes down to the second
17 full paragraph?

18 **A. Yeah.**

19 **"You gift me a large amount of
20 money, then we fall in love, then
21 we lock horns."**

22 Q. I'm on page 25 of 39.

23 **A. Yep.**

24 Q. I'm in the middle of the page.

25 **A. Yep.**

<p style="text-align: right;">301</p> <p>1 Q. I know you keep saying it's a gift. 2 Again, you and your lawyer can say that all day long 3 when it's your time. 4 A. Okay. 5 Q. But I'm going to have to bring you back 6 here for another deposition because of the evasion 7 that you're putting us through here today? 8 A. There's no evasion. I'm insulted by 9 that. 10 Q. Every time I ask you a question you take 11 me to something else. 12 A. I said -- 13 Q. And I had a discussion with your 14 attorney about this. 15 So, again, just focus where I take you, 16 and we can get through this faster. 17 She's asking you here, right here, on 18 this page in the middle of the page -- right? -- for 19 the lawyer's details. Of course she uses the word 20 solicitor, as a European would, so that all the 21 paperwork is dealt with and establish healthy root 22 in a flourishing business relationship. 23 So she's asking why not? Why won't you 24 give her any of the paperwork regarding these 25 investments?</p>	<p style="text-align: right;">303</p> <p>1 (Whereupon the document referred 2 to was marked Plaintiff's 3 Exhibit 9 by the Certified 4 Shorthand Reporter and is attached 5 hereto.) 6 BY MR. WITTENBERG: 7 Q. Let me know when you're ready. 8 A. Okay. 9 Q. Let's start on page three of three. 10 On September 18th at 2:33 you write 11 Plaintiff, 12 "I should be taking more meetings 13 so when we see each other we have 14 more details worked out. I want 15 Oasis to be a huge success." 16 So you're still telling her that you're 17 working on business meetings so that the investment 18 in Oasis can grow out; is that right. 19 A. "I should be taking more meetings, 20 so when we see each other we have 21 some more details to work out." 22 And then I express the desire for Oasis 23 to be a huge success, yes. 24 Q. Okay. And this is the same master 25 company Oasis that Plaintiff was the owner that you</p>
<p style="text-align: right;">302</p> <p>1 We've shown email after email. You're 2 not giving her anything. 3 It's because nothing existed at the 4 time; is that right? 5 A. I think everything is in my response, 6 Mr. Wittenberg. 7 Q. Now, we've asked you for all paperwork 8 related to any investments that you made in this 9 litigation. 10 What -- 11 A. You asked for all the bank -- 12 Q. What paperwork have you given us 13 regarding any investments you've made? 14 A. None. 15 Q. Okay. Because none ever existed, 16 correct? 17 A. I gave you my bank statements. 18 Q. Okay. Which is not an investment, is 19 it? 20 A. Sure it is. It shows the Brian Weiner 21 thing, it shows Lamont Faust investments. I can 22 give you travel records if you have those printed 23 out. That's an investment. 24 Q. All right. Let's move on. 25 We'll mark this as Exhibit 9, I believe.</p>	<p style="text-align: right;">304</p> <p>1 told her she would own, right? 2 A. This is the same company that at that 3 period of time when we were discussing things, 4 that's how it looked. 5 Q. Okay. Now, if we look at the next 6 email, you have on September 25th where you write at 7 2028, 8 "Linda told me you want your money 9 back. She also said other stuff." 10 Are you referring to Linda Barrett? 11 A. Where? I don't see this. 12 Q. If you look at the very bottom, the 13 bottom of page two of three and the top of page 14 three of three. 15 Do you see that? 16 A. "Linda told me you want your money 17 back. She also said some other 18 stuff." 19 I don't remember writing that. 20 Q. Did Linda Barrett ever tell you she 21 spoke with Plaintiff? 22 A. Yes. 23 Q. Okay. On the telephone? 24 A. Yep. 25 Q. In person?</p>

305

1 **A. Yeah.**
 2 Q. They met in person, as well?
 3 **A. No. They didn't meet in person.**
 4 Q. Okay. Just on the telephone.
 5 So around this time she told you that
 6 they spoke?
 7 Is that -- do you remember any of that
 8 or not?
 9 **A. I think they spoke sometime in**
 10 **mid-September, yeah.**
 11 Q. So let's go to September 25th. It
 12 starts on page one of three, 2:12 P.M., and
 13 Plaintiff writes to you,
 14 "You told me she is a nut."
 15 And that's in response to you saying, of
 16 course, like we just said, Linda Barrett told you
 17 she wants her money back.
 18 Did you ever tell Plaintiff that Linda
 19 Barrett is nuts?
 20 **A. No.**
 21 Q. Did you ever tell anybody that Linda
 22 Barrett's nuts? Here and there?
 23 **A. I told her to her face when she gets,**
 24 **you know --**
 25 Q. But you never told Plaintiff that Linda

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1 Barrett's nuts?
 2 **A. I don't recall that I -- that I did.**
 3 Q. Okay.
 4 **A. Could I have written this? Sure.**
 5 Q. Do you think Linda Barrett's
 6 well-balanced?
 7 **A. Yeah. She's well-balanced. She has a**
 8 **temper.**
 9 Q. Is she an honest person?
 10 **A. Yeah.**
 11 Q. So if she writes something, you can
 12 trust that she's being honest when she says it?
 13 **A. Here's the thing. Okay?**
 14 Q. Well, it's a "yes" or "no" question. I
 15 don't need a thing, Mr. Schoenberger.
 16 **A. Yes. But she also took a police course**
 17 **and she also does -- she investigates things, so she**
 18 **doesn't mind taking a role to find out whatever she**
 19 **feels --**
 20 Q. So then she -- you know her to be
 21 capable of being dishonest? Is that what you're
 22 telling us?
 23 **A. I believe every human being can be**
 24 **dishonest.**
 25 Q. Specifically we're going to talk about

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1 Linda Barrett. And this is where I think you're
 2 trying to be evasive.
 3 We're not talking about every human
 4 being. We're talking about Linda Barrett.
 5 Has she ever been dishonest to you?
 6 **A. I guess when she grabbed my phone --**
 7 Q. Yes or no, has she ever been dishonest
 8 to you?
 9 **A. Yes. But in general, no.**
 10 Q. But there have been times when she's
 11 lied to you, right?
 12 **A. Rarely, yes.**
 13 Q. Okay.
 14 **A. Mr. Wittenberg --**
 15 Q. Here you have an email from Plaintiff to
 16 you, and I'm pointing it out, where Plaintiff's
 17 telling you you told Ms. Barrett she's a liar
 18 because she stole your phone, right?
 19 And you just said she lied to you about
 20 stealing your phone.
 21 Did she steal your phone or did she lie
 22 to you about that?
 23 **A. She took my phone.**
 24 Q. We're talking about Ms. Barrett. Did
 25 Ms. Barrett steal your phone?

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1 **A. She didn't steal it. She grabbed it**
 2 **from me.**
 3 Q. Did she call the cops on you?
 4 **A. Yeah.**
 5 Q. Okay. What did she report?
 6 **A. I forgot what she reported, but they**
 7 **asked me if they wanted me to take her away. So**
 8 **they didn't do anything. It was --**
 9 Q. Which police department?
 10 **A. Paso Robles.**
 11 Q. Okay. And do you remember where that
 12 was?
 13 Is there only one police department
 14 there?
 15 **A. Yeah, there's only one.**
 16 Q. If you go down one, two, three -- four
 17 paragraphs, it says -- and this is Plaintiff
 18 emailing you,
 19 "I would like to clarify any
 20 misunderstanding there may be since
 21 the correspondence you've had about
 22 it did not seem to sync. She kept
 23 her savings as a draft for a while.
 24 It was dedicated to build Oasis.
 25 Due to unfortunate

309	<p>1 circumstances" --</p> <p>2 And she goes on. She states here,</p> <p>3 "I decided to invest into your</p> <p>4 business to provide you what Oasis</p> <p>5 is about with the reading space."</p> <p>6 So here again, this is September, and</p> <p>7 this is following all your emails about your loan</p> <p>8 and your this and your that, it's very clear that</p> <p>9 she believes she's made an investment as a way to</p> <p>10 take advantage of your work.</p> <p>11 A. Take advantage of my work?</p> <p>12 Q. Let me be clear. She says,</p> <p>13 "In order to be make sure that you</p> <p>14 would not think of it as a way to</p> <p>15 take advantage of your work, she</p> <p>16 would make demands as an investor,</p> <p>17 she presented it as a rose, as a</p> <p>18 gift."</p> <p>19 A. Yeah.</p> <p>20 Q. "It's a different way to express?</p> <p>21 that no strings were attached. She</p> <p>22 trusted you and gave you carte</p> <p>23 blanche."</p> <p>24 You understood this, right?</p> <p>25 A. Yes. And let's read this again.</p>	311	<p>1 A. An active investor will be politically</p> <p>2 involved in how a company is formed, run, and what</p> <p>3 their forward-looking vision is.</p> <p>4 A passive investor will expect a certain</p> <p>5 percentage of the company but has -- doesn't have</p> <p>6 majority voting rights, doesn't have a say in how a</p> <p>7 company's future is dictated, doesn't have a say in</p> <p>8 the way that their org chart is formed.</p> <p>9 Q. A passive investor has no say in how the</p> <p>10 company is operated, agreed?</p> <p>11 A. Yeah.</p> <p>12 Q. They're not looking to control the</p> <p>13 company. They're want the person with the talent to</p> <p>14 be able to manage the company without input from the</p> <p>15 passive investor.</p> <p>16 But the money, that's being contributed</p> <p>17 so the active investor can go utilize their talents</p> <p>18 and make more money.</p> <p>19 Is that the way how you understand</p> <p>20 things?</p> <p>21 A. I think that's one type of passive and</p> <p>22 active.</p> <p>23 Q. So let's go on here.</p> <p>24 She says here,</p> <p>25 "Giving the benefit, the fruits of</p>
310	<p>1 "I decided to invest in your</p> <p>2 business to provide you" -- and</p> <p>3 then in parentheses -- "what Oasis</p> <p>4 is about, with a breathing</p> <p>5 space" -- quote-unquote -- "for</p> <p>6 creativity and talent to flourish,</p> <p>7 in order to make sure that you</p> <p>8 would not think of it in a way to</p> <p>9 take advantage of your work, make</p> <p>10 demands as an investor, equity</p> <p>11 control, et cetera. I presented it</p> <p>12 as rose and as a gift."</p> <p>13 This is her words, sir. This is not</p> <p>14 mine.</p> <p>15 Q. Right. Meaning -- have you ever heard</p> <p>16 of a passive investor?</p> <p>17 Do you know what that means?</p> <p>18 A. Yes. A passive investor is an investor</p> <p>19 who will expect a return, who will not put it in</p> <p>20 transitive words like gifting --</p> <p>21 Q. No, no, no. Do you know the difference</p> <p>22 between a passive investor and an active investor?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Can you tell us what the</p> <p>25 difference is?</p>	312	<p>1 \$300,000 investments in Oasis,</p> <p>2 gadgets, et cetera."</p> <p>3 It's constantly coming back to the</p> <p>4 investment.</p> <p>5 On June 17th where she says,</p> <p>6 "I'm investing this money with</p> <p>7 you."</p> <p>8 Did you -- in your mind was it that this</p> <p>9 total stranger that you didn't even know is just</p> <p>10 coming out of the blue and giving you, a person who</p> <p>11 has no money, 400,000 dollars of U.S.D. almost just</p> <p>12 because -- for what? What were you thinking?</p> <p>13 A. Not so unusual.</p> <p>14 Q. Not so unusual? You said "not so</p> <p>15 unusual"?</p> <p>16 Has this happened to you before?</p> <p>17 A. It's happened to people that I -- that</p> <p>18 I've known, that I grew up with. People in Silicon</p> <p>19 Valley were used to getting lots.</p> <p>20 But the way it --</p> <p>21 Q. I'm sorry. What were they used to</p> <p>22 getting?</p> <p>23 A. Used to getting seed money. The person</p> <p>24 that Brian Weiner was involved with got \$2 million</p> <p>25 from Tim Draper --</p>

313

1 Q. That's right. It's called seed money
 2 for investment purposes.
 3 A. This was seed money.
 4 Q. So we agree?
 5 A. Yeah.
 6 Q. Now let's move on to --
 7 A. Never called it a gift.
 8 Can we get a copy of this too?
 9 Q. So then after all that you get back to
 10 her here on this Exhibit 8 -- or is it 9? If I
 11 misspoke -- it's Exhibit 9.
 12 And it's page one of three at the very
 13 top where you write to her on 26 September 2014 at
 14 2926 IST,
 15 "Okay, let's forget Oasis until
 16 2015 or 2016. Or get on a plane
 17 and follow your dream. There's no
 18 time to waste."
 19 So she writes all that to you about the
 20 money, and you just ignore her completely and you
 21 say, "Ehh, forget about it." You don't address,
 22 "Hey, you always understood this was a gift. This
 23 was never any business. You gave this to me."
 24 You never said this. You don't respond
 25 to that, do you?

314

1 A. I had been calling her nonstop and she
 2 wouldn't pick up the phone.
 3 And also there's another email, which I
 4 don't know if you have where she casually said,
 5 "Let's forget Amsterdam. I'm going
 6 to Paris."
 7 I need to use the restroom one more
 8 time. I'm sorry. I had a lot of coffee. And what
 9 is this about today? I'm not trying to be
 10 obnoxious.
 11 MR. PARMELEE: Off the record.
 12 MR. WITTENBERG: Off the record.
 13 (Brief recess.)
 14 MR. WITTENBERG: We'll go back on record
 15 and we'll start with Exhibit 10, if you want to mark
 16 this.
 17 (Whereupon the document referred
 18 to was marked Plaintiff's
 19 Exhibit 10 by the Certified
 20 Shorthand Reporter and is attached
 21 hereto.)
 22 BY MR. WITTENBERG:
 23 Q. Let me know when you're ready,
 24 Mr. Schoenberger.
 25 A. Okay.

315

1 Q. So, first, this is an email from you on
 2 September 30, 2014, to Plaintiff, correct?
 3 A. Uh-huh.
 4 Q. Do you remember -- and that's a yes,
 5 right?
 6 We remember we're on the record, so we
 7 need "yes" or "no."
 8 A. This appears to be an email from me to
 9 her, although I do not recollect writing this.
 10 There is a misspelling with hormonal.
 11 Q. Is that your email address?
 12 A. Yes.
 13 Q. Thomasschoenbergerson@gmail?
 14 A. Yes.
 15 Q. Did Brian ever tell you that Plaintiff
 16 told Brian that you gambled the money away?
 17 A. No.
 18 Q. Brian never told you that?
 19 A. Brian called me up and Brian told me
 20 only that Plaintiff had called up and said "I gave
 21 him all my money. You know, it's fraud."
 22 That is exactly what she did. And I'm
 23 thinking, "What? She called you up and she said
 24 this to you?"
 25 And I felt pretty humiliated --

316

1 Q. And so you wrote this email to
 2 Plaintiff?
 3 A. I don't remember writing it.
 4 Q. But you may have? You may have wrote
 5 it, right?
 6 A. I think that I may not have either.
 7 Q. Okay. You say here,
 8 "What shit."
 9 So if you wrote it, you're saying that
 10 you gambled the money away. You did gamble -- in
 11 fact, you did gamble the money way, right?
 12 A. Yeah.
 13 Q. That's not an issue.
 14 Did you also buy drugs with the money?
 15 A. No.
 16 Q. You have taken no contraband, no
 17 cocaine?
 18 A. I -- I take Amlodipine. I don't do
 19 drugs.
 20 Q. Okay. Then it goes down and says
 21 Brian --
 22 "Brian says you sounded hormonal
 23 and you claimed I took money for
 24 Oasis. 12" -- "12 emails" --
 25 I assume that's emails, right?

317

1 -- "from you show that you have me
 2 the money and had nothing to do
 3 with Oasis."
 4 Do you remember writing this?
 5 **A. No.**
 6 Q. Do you have 12 emails that show that
 7 Plaintiff -- I believe it's probably trying to say
 8 gave you the money?
 9 **A. I don't believe I wrote this email.**
 10 Q. Okay. So let's move past it and move to
 11 the next.
 12 This will be Exhibit 11.
 13 (Whereupon the document referred
 14 to was marked Plaintiff's
 15 Exhibit 11 by the Certified
 16 Shorthand Reporter and is attached
 17 hereto.)
 18 BY MR. WITTENBERG:
 19 Q. Did somebody have access to your account
 20 at the time, this thomasschoenbergerson@gmail
 21 account?
 22 **A. (No audible response.)**
 23 Q. And who was that?
 24 I'm sorry. You shook your head yes,
 25 correct?

318

1 **A. I'm not sure who did. I know I didn't**
 2 **write this.**
 3 Q. Did somebody have access -- remember
 4 we're audible for the record.
 5 Did somebody have access to your
 6 thomasschoenbergerson@gmail.com account?
 7 **A. Not that I'm aware of.**
 8 Q. Okay.
 9 **A. But what I will say for the record is**
 10 **this doesn't even sound like me.**
 11 Q. Okay.
 12 **A. And this is not what Brian said.**
 13 Q. Okay. So we're on to the next exhibit,
 14 Exhibit 11.
 15 I'm waiting for you, Mr. Schoenberger.
 16 **A. Uh-huh.**
 17 Q. Are you ready?
 18 **A. Yeah.**
 19 Q. All right. There's two emails here. At
 20 the very bottom on November 6th it's from Plaintiff
 21 to you. She's asking you to return her money that
 22 she transferred to you, but it says you refused.
 23 Is that correct? You never returned any
 24 money to her, right?
 25 **A. She never asked me to return any money**

319

1 **other than in this email.**
 2 Q. The same question. Have you ever given
 3 her -- returned her her \$398,000 -- almost \$400,000?
 4 **A. I have not returned her almost \$400,000**
 5 **gift.**
 6 Q. Okay. She says,
 7 "I'm the owner of the business as
 8 we agreed."
 9 Is that also something you're going to
 10 say is not true, she was never the owner of the
 11 business as you agreed?
 12 **A. We had not even incorporated. So what**
 13 **business?**
 14 **If it's Oasis, I wanted her to be the**
 15 **owner.**
 16 Q. And you had an agreement that she would
 17 be the owner of Oasis, and that was how you were
 18 going to use funds?
 19 **A. She was going to be the head of Oasis of**
 20 **which funds would come from multiple sources.**
 21 Q. Okay. Now, up top -- well, she does go
 22 on to say business is not going forward, and you had
 23 told her you're not going forward with Oasis.
 24 Do you remember telling her that?
 25 **A. No.**

320

1 Q. No?
 2 I believe you say here in this
 3 Exhibit 9,
 4 "Okay. Let's forget Oasis."
 5 And you say, oh, till 2015 or 2016.
 6 **A. I didn't say forget Oasis.**
 7 Q. At the time it was September 26, 2014.
 8 And you say forget Oasis till 2015 or 2016 as it's
 9 not doing --
 10 **A. I said forget Oasis forever or did I**
 11 **give a date?**
 12 Q. No. I'm using your words, 2015 or 2016.
 13 **A. I was trying to get a response from her.**
 14 **I was trying to reach her.**
 15 Q. So you were trying to get a response by
 16 what? Manipulating her?
 17 **A. I said let's forget Oasis until 2015. I**
 18 **figured that would be the motivation that she would**
 19 **call me.**
 20 Q. And so clearly you're not going forward
 21 with the business at that time, right?
 22 **A. Waiting for her to be in touch so**
 23 **that --**
 24 Q. Wait a minute. You had invested all the
 25 money in gambling. There was no money left, right?

321

1 **A. There was the nucleus of ways to -- ways**
 2 **to get money. At this point --**
 3 Q. Are you agreeing with me that the money
 4 was gone by this time in November of 2014?
 5 **A. A lot of it, yeah.**
 6 Q. Almost all of the \$400,000?
 7 **A. Yeah.**
 8 Q. Okay. And so there was no business
 9 going forward after that with money she transferred
 10 to you, right?
 11 **A. Not -- not with that. But there's --**
 12 **but there's business.**
 13 Q. Okay. So the -- did you get the answer?
 14 (Whereupon the record was read as
 15 follows:
 16 "Question: Okay. And so there
 17 was no business going forward
 18 after that with money she
 19 transferred to you, right?
 20 "Answer: Not -- not with that.
 21 But there's -- but there's
 22 business.")
 23 BY MR. WITTENBERG:
 24 Q. Okay. Then you respond on
 25 November 15th, again, you're saying,

322

1 "Well, you said it was a gift."
 2 Then you have six emails spelling it
 3 out.
 4 Did you write this email?
 5 **A. Yeah. On my own.**
 6 Q. Okay. And it's very similar to the
 7 email that I showed you before that you said wasn't
 8 you on Exhibit 10. You said "I have 12 emails."
 9 Now you say you have six mails.
 10 **A. Where is it on Exhibit 10?**
 11 Q. You just looked at it. You said you
 12 didn't think it was you?
 13 **A. And what do you see as far as a**
 14 **similarity, sir?**
 15 Q. You say you have 15 emails saying it was
 16 a gift. Here you have "I have 12 emails saying the
 17 money had nothing to do with Oasis."
 18 **A. No. This one just says 12 mails from**
 19 **you. And this one I say emails twice. So --**
 20 Q. Typos everywhere. But putting typos
 21 aside, the concept's pretty much the same, isn't it?
 22 **A. Big difference.**
 23 Q. Okay.
 24 **A. And I'll tell you why. That's from an**
 25 **iPhone (indicating), this is not (indicating).**

323

1 Q. Okay. Do you have an iPhone?
 2 **A. I had an iPhone.**
 3 Q. And you used to use an iPhone?
 4 **A. Yeah.**
 5 Q. And you've also sent emails from an
 6 iPad, right?
 7 **A. I may have. But I haven't used an iPad**
 8 **in a long time.**
 9 Q. And you own computers, right?
 10 **A. I own a computer, yeah.**
 11 Q. A laptop or a hard drive?
 12 **A. Laptop. I had to get rid of my last one**
 13 **because of the hack.**
 14 Q. So here on November 15, 2014, which
 15 you've admitted to writing this email, you say that,
 16 "Then because you want to do Oasis,
 17 I spent 12K one you" --
 18 Again a typo. I think you meant to say
 19 "on you."
 20 -- "and then invested the
 21 remainder."
 22 Again, this is months after the money
 23 was transferred to you and you keep telling her you
 24 invested money, but now you're saying you never
 25 invested the money; you spent it on gambling.

324

1 How do you -- how can you explain to us
 2 what you told her here, which is "I invested the
 3 remainder of the gift," meaning "the entire transfer
 4 you gave me of almost \$400,000 minus \$20,000,
 5 invested"?
 6 Where did you invest the remainder of
 7 the gift?
 8 **A. Are you under the assumption that**
 9 **\$350,000 was spent at a casino gambling?**
 10 Q. You told us earlier it could have been
 11 as much as \$300,000 that you've gambled away.
 12 **A. It could have.**
 13 Q. Okay.
 14 **A. I am -- I am absolutely not sure.**
 15 Q. You're the only one with the records.
 16 So if you can't show us one way or the other and
 17 you're telling us it could be \$300,000, then that's
 18 what it is. And that's the way it has to be.
 19 I'm focusing you now on where you're
 20 telling her before this litigation commenced that
 21 you're telling her that you invested 350 or 60 or 70
 22 thousand dollars.
 23 **A. Are you sure this wasn't when I had been**
 24 **served on November 15th?**
 25 Q. Well, we'd have to look at the

325

1 Complaint.
 2 The Complaint was filed on
 3 November 24th. So I'm pretty sure --
 4 **A. Okay.**
 5 Q. Yes, you were not served at this time.
 6 There was no lawsuit at this time.
 7 You're telling her, though, which you
 8 keep evading, that you invested money, probably, you
 9 know, \$360,000 when you subtract the 20 from what
 10 she sent you.
 11 Where was it invested?
 12 **A. First of all, the 20K that I'm referring**
 13 **to here was money that -- she was here for three**
 14 **weeks, expensive hotels, gifts, she bought a lot of**
 15 **things.**
 16 Q. You have no receipts for any of that,
 17 right?
 18 **A. She had the receipts --**
 19 Q. You don't have receipts, right?
 20 Just let's focus -- I know you want to
 21 evade and say she has it.
 22 But again, you know, do you have them or
 23 not?
 24 **A. No. She has them.**
 25 Q. Okay. Thank you.

326

1 **A. You're welcome.**
 2 Q. Now, did you invest any of the money
 3 like you're telling her you did before this lawsuit
 4 started?
 5 **A. Sure.**
 6 Q. Okay. Where did you invest the money?
 7 **A. In growing Sophia Musik.**
 8 Q. Okay.
 9 **A. Creating videos. Brian Weiner was going**
 10 **to do a big website.**
 11 Q. Okay. And the remainder of the gift,
 12 360, roughly, thousand dollars. That's what you're
 13 telling her?
 14 **A. This was -- this was done after she had**
 15 **known what I had to spend on lawyers, what I had to**
 16 **spend with my defense, what I had to spend on being**
 17 **falsely arrested.**
 18 Q. You go down and you say,
 19 "You are the owner of the business,
 20 I agree. But the gift you gave me
 21 willingly has nothing to do with
 22 Oasis."
 23 So she gave you money that you invested,
 24 300 and roughly 80, 90 thousand dollars, and you're
 25 saying that money has nothing to do with the

327

1 business that you -- that you say she owns, right?
 2 There's no connection at all?
 3 **A. I think that --**
 4 **"But the gift you gave to me**
 5 **willingly had nothing to do with**
 6 **Oasis when it started."**
 7 **She gave me a gift to expand my**
 8 **projects, as she put it, gadgets and tools. So I**
 9 **think I was the one talking about Oasis and wanting**
 10 **to make it something huge.**
 11 Q. I didn't understand your response.
 12 **A. Okay.**
 13 Q. I'm asking you if there's any connection
 14 between the money that she gave you that you say you
 15 invested, roughly \$370,000, according to your math
 16 on this Exhibit 11, and then you telling her that
 17 she's the owner of a business, but it has nothing to
 18 do with the money she gave you.
 19 And I'm asking how -- how do you explain
 20 that?
 21 **A. Well, we're in development of a**
 22 **business. She walks away from the table. I didn't**
 23 **say goodbye. I was --**
 24 Q. So in your mind, the money that she
 25 transferred to you was yours, you can spend it any

328

1 way you want, but you're going to start a business
 2 with Plaintiff with no money, because you're using
 3 that \$400,000 any way you want.
 4 But you two are doing business anyway?
 5 **A. Oh, think of it this way. I had a guy**
 6 **who was building out a website. I had that one**
 7 **person, Brian Weiner, and another person, we were**
 8 **engaged in getting a \$50 million loan.**
 9 **I was trying to work contracts -- or**
 10 **contracts all over the place to make it viable.**
 11 **So, yeah. Absolutely. I had a great**
 12 **belief system in Oasis and I had a great belief**
 13 **system in the Plaintiff.**
 14 Q. So let's authenticate this as
 15 Exhibit 12.
 16 (Whereupon the document referred
 17 to was marked Plaintiff's
 18 Exhibit 12 by the Certified
 19 Shorthand Reporter and is attached
 20 hereto.)
 21 BY MR. WITTENBERG:
 22 Q. Let me know when you're ready.
 23 **A. Okay.**
 24 Q. Okay. This was an email from you, if
 25 you see Thomas Schoenberger November 26, 2014, at

329

1 7:01 to Plaintiff.
 2 Do you see that?
 3 **A. It was November what?**
 4 Q. November 26, 2014.
 5 **A. Okay.**
 6 Q. 7:01.
 7 **A. And she had filed on December -- or --**
 8 Q. She filed November 24th. But we don't
 9 know when you were served right now.
 10 The point is do you see the email that
 11 you wrote here?
 12 **A. Yeah.**
 13 Q. Did you write this email?
 14 **A. I believe I did.**
 15 Q. Okay. Now, you say in here,
 16 "Linda stole my identity."
 17 Okay?
 18 Did Linda steal your identity.
 19 **A. Yes.**
 20 MR. PARMELEE: I was just going to say
 21 objection as vague.
 22 But he can answer.
 23 BY MR. WITTENBERG:
 24 Q. So, how did Linda steal your identity?
 25 **A. She grabbed my phone when I was sleeping**

330

1 **and she copied down things that -- I think she sent**
 2 **an email to the Plaintiff and assumed my identity**
 3 **and said "Call me. It's important."**
 4 **And then for whatever other reason,**
 5 **there were emails that were going to her, and I**
 6 **couldn't understand why.**
 7 Q. So the only way you know she stole your
 8 identity was taking your phone; is that right?
 9 **A. Yeah.**
 10 Q. And sending emails as if it's you,
 11 correct?
 12 **A. Yeah.**
 13 Q. Is there any other way she stole your
 14 identity?
 15 **A. Not that I know.**
 16 Q. Then you go on and you say that,
 17 "She" -- meaning Linda Barrett --
 18 "is out of your life for good."
 19 Do you see where you wrote that?
 20 **A. Yeah.**
 21 Q. Okay. Was that true when you wrote this
 22 on November 26, 2014?
 23 **A. Out of my life for good as in sexually.**
 24 Q. Okay. But you were still living
 25 together at the time you wrote this, correct?

331

1 **A. Yeah.**
 2 Q. Okay. So she wasn't out of your life
 3 for good as you represented; is that right?
 4 **A. We haven't been boyfriend and**
 5 **girlfriend. We're not intimate --**
 6 Q. But she's not -- I know you want to
 7 evade the question, but you're living together, so
 8 she's not out of your life, right?
 9 **A. Yeah.**
 10 Q. Okay. And we go on here and it says,
 11 "Here's where we are at now. I
 12 know I said by early 2015
 13 investments would start paying
 14 off."
 15 So you're still in November 2014
 16 representing to Plaintiff that you made investments
 17 with her money, correct?
 18 **A. I didn't say her investment from her**
 19 **money. I said investments.**
 20 Q. Okay.
 21 **A. I was trying to start a big business.**
 22 Q. When you said investments, it didn't
 23 mean money? It didn't mean money?
 24 **A. I hoped that it had meant money, but**
 25 **this was --**

332

1 Q. At the time did you mean money when you
 2 wrote the word "investments"?
 3 **A. I have business value. I'm not trying**
 4 **to be evasive, sir. I'm trying to tell you maybe**
 5 **the way that my brain words.**
 6 Q. Then you go on,
 7 "It looks like mid-December, so
 8 contact me when you fell ready."
 9 So you're telling her that the
 10 investments going to be paying off by December 2014,
 11 and she'd have some money by then.
 12 **A. Yes, sir.**
 13 **Could I have a minute to explain this?**
 14 **Is that all right? It's probably good.**
 15 **Because I had come back from the Middle**
 16 **East, and I had had high hopes from the people that**
 17 **I had met there.**
 18 **And also at the time I had a -- contacts**
 19 **in Naval intelligence, and I was hoping that I could**
 20 **put together people with military backgrounds who**
 21 **could train the Kurds and that our company would act**
 22 **as a third -- as a broker putting together money,**
 23 **talent and fighters.**
 24 **And I had made it very clear to -- to**
 25 **Plaintiff that I wanted her involved in this**

333

1 **business, as well. We spoke about it at length.**
 2 **And this is where a lot of her**
 3 **conversations regarding her ex-boyfriend being**
 4 **military -- a mercenary, as she put it, and her**
 5 **father being a decorated commando in the French**
 6 **Army.**
 7 Q. Are you finished?
 8 A. **Yeah.**
 9 Q. So do you see the next line it says,
 10 "I want to make sure you're okay.
 11 I will arrange to have this
 12 investor wire you directly."
 13 So you're telling her that you're going
 14 to have an investor wire her money, correct?
 15 A. **I had hoped.**
 16 Q. Okay. Because the investments you made
 17 with her money was paying off, so you were going to
 18 be able to give her money, a return back; is that
 19 right?
 20 A. **Not quite.**
 21 Q. Okay.
 22 A. **I want to look at this thing.**
 23 **I didn't mean wire. I meant work with**
 24 **you directly. The person that I was discussing this**
 25 **with, I can get you his contact number.**

334

1 Q. Did you know -- do you know that
 2 investor name in mind when you read this? Is there
 3 someone that you have in mind?
 4 A. **Yeah. A guy named Erdan, a Turkish**
 5 **guy --**
 6 Q. Okay.
 7 A. **-- I was trying to set up a -- I was**
 8 **trying to set up, as I said, a business that would**
 9 **be in the business of confronting ISIS.**
 10 **This person had a textile company that**
 11 **was in both Amsterdam and in Istanbul. So I was**
 12 **trying to set up some -- some things with him where**
 13 **he would manufacture anything that we wanted.**
 14 **So I was attempting to mix business with**
 15 **a -- with a military business.**
 16 Q. Okay. Let me mark this next exhibit as
 17 Exhibit 13.
 18 (Whereupon the document referred
 19 to was marked Plaintiff's
 20 Exhibit 13 by the Certified
 21 Shorthand Reporter and is attached
 22 hereto.)
 23 THE WITNESS: Yep.
 24 BY MR. WITTENBERG:
 25 Q. Okay. This is an email from you on

335

1 October 1, 2014 to Plaintiff; is that correct?
 2 A. **Yes.**
 3 Q. Okay. And when you read this, it says
 4 at the very last sentence,
 5 "Oasis can work still but not if
 6 you do things like this."
 7 So you're --
 8 A. **Well, what else does it say?**
 9 **"But not if you do things like this**
 10 **or throw things out windows."**
 11 Q. So essentially -- and when you say "My
 12 best to Patrice," do you know who Patrice is?
 13 A. **Yeah. Patrice was her old boyfriend.**
 14 Q. Okay. So is this you jealous or
 15 something?
 16 A. **I think if it was jealous, wouldn't I be**
 17 **a little bit more forceful?**
 18 **I had assumed -- I had assumed at that**
 19 **point, sir, since she had left early that she had**
 20 **gone back to -- to him. I think wishing someone the**
 21 **best doesn't show any jealousy, any aggressiveness**
 22 **whatsoever.**
 23 Q. You're telling her that you had amazing
 24 things to show her but somehow you wanted -- she
 25 wanted your contacts. And,

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1 "So it's a veiled threat. Oasis
 2 can work but not if you do things
 3 like this."
 4 Right.
 5 A. **She had thrown things out of a hotel**
 6 **window, and I do have evidence of that.**
 7 Q. That's your version of the story, right?
 8 A. **Well, actually there were witnesses.**
 9 Q. Okay.
 10 A. **So there's -- that can be presented in**
 11 **court.**
 12 Q. I'm sure you'll do that. Okay? If you
 13 actually have some.
 14 Let's go to the next exhibit. And it
 15 will be 14.
 16 (Whereupon the document referred
 17 to was marked Plaintiff's
 18 Exhibit 14 by the Certified
 19 Shorthand Reporter and is attached
 20 hereto.)
 21 BY MR. WITTENBERG:
 22 Q. So this is an email from you on
 23 September 26, 2014, to Plaintiff, correct?
 24 A. **Yeah.**
 25 Q. Okay. And here you're saying you're

337

1 furious, right? You're angry over something, right?
 2 In the second line.
 3 **A. Yeah. But you don't know if I wrote the**
 4 **subject line or if she had an earlier one that she's**
 5 **gotten rid of. All it says is --**
 6 Q. What we do know is that it is a subject
 7 line, and you wrote to her and it says,
 8 "I am furious."
 9 **A. I see that there is a subject line. We**
 10 **don't know if it was a threat, Mr. Wittenberg.**
 11 Q. We can tell -- you can produce any email
 12 you want to show it was somehow not what you wrote.
 13 But for now, this is an email you wrote to Plaintiff
 14 on September 26th.
 15 We can agree to that?
 16 **A. Yeah.**
 17 Q. Okay. And the subject line says "I am
 18 furious."
 19 It does, right?
 20 **A. Uh-huh.**
 21 Q. And it says,
 22 "You agree to a trip, you cancel at
 23 the last minute and you blame me
 24 when I don't send you paperwork."
 25 So clearly it sounds like here you're

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1 upset about something, you're angry, right?
 2 **A. "Oasis is being built and you're**
 3 **ruining it with your detractions.**
 4 **You were supposed to be in**
 5 **Amsterdam for love."**
 6 **This doesn't sound like someone out of**
 7 **control.**
 8 Q. Let's read the rest.
 9 "I guess you found someone else."
 10 This goes back to what I was saying
 11 earlier, Mr. Schoenberger. There's plenty of
 12 evidence where you are writing emails where you are
 13 offended and you're furious about what you believe
 14 was Plaintiff's rejection of your love.
 15 And, so, money's a gift. It's not a
 16 business anymore, right?
 17 **A. Could you find me another one where I**
 18 **say furious? You just said that there's plenty.**
 19 **I'd like to be able to see it.**
 20 Q. I showed you one earlier where you said
 21 you were offended. Now we have one where it says
 22 you're furious. That's two, right?
 23 **A. That's actually one that says offended**
 24 **and one that says furious.**
 25 Q. And they're both saying the same thing;

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1 basically, that you believe she's rejecting you,
 2 she's found someone else, thanks for the money, you
 3 write.
 4 Do you see that?
 5 **A. Exclamation point? Oh, I'm sorry. It's**
 6 **just a period.**
 7 Q. "We'll still do Oasis because my
 8 word is golden, but you set up the
 9 L.L.C."
 10 So you're sort of blackmailing here,
 11 right?
 12 **A. No.**
 13 Q. Either be with me and the money is mine
 14 and, you know, you set up the L.L.C. on your own?
 15 **A. I categorically deny that it's a**
 16 **blackmail of any sort.**
 17 Q. Well, certainly you're saying you're
 18 upset and you're furious, with somebody else, thanks
 19 for the money. That's when we really start to see
 20 you saying "We're not going to do business anymore,
 21 you know, but my word is golden."
 22 What did you mean by that?
 23 **A. Mr. Wittenberg, I just told you even**
 24 **today where I stand that I would give her 50 percent**
 25 **of my music.**

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1 **You asked what's the rock hard value,**
 2 **and I told you the rock hard value can be if it**
 3 **places, you know, rock golden if it places.**
 4 **So I don't think that my word's bad**
 5 **here. I do -- I do respect you, sir, but I think**
 6 **that you're -- let me quote Shakespeare, "Every twig**
 7 **is not a serpent."**
 8 Q. So before you said you were setting up
 9 the L.L.C.
 10 Do you remember that in various emails?
 11 **A. I said I'm ready to set up the L.L.C.**
 12 Q. And now here you're saying for the first
 13 time,
 14 "We'll still do Oasis" --
 15 Because you, I guess, promised you were
 16 going to do Oasis together, right?
 17 **A. Right.**
 18 Q. But she has to set up the L.L.C.?
 19 **A. The business was going to be in her name**
 20 **only. I couldn't do an Oasis with -- an L.L.C. with**
 21 **her without signatures for both of us.**
 22 Q. But you say "Oasis is being set up"
 23 here.
 24 You do see that?
 25 **A. Yeah.**

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1 Q. Okay. What have you done to this point
 2 in September 26th to build up Oasis?
 3 Is it simply paying Brian Weiner \$12,500
 4 to build a website?
 5 **A. No. At this point right now Oasis had**
 6 **also included what we saw was a migrant crisis. I**
 7 **was trying to think of Oasis as a way to feed --**
 8 Q. But what have you done to build -- not
 9 thinking in concept in your head, Mr. Schoenberger.
 10 You say it's being build built up.
 11 What real world steps have you taken to
 12 build up Oasis?
 13 **A. Well, I was in Istanbul literally**
 14 **feeding orphans, feeding children. I was meeting**
 15 **with Kurdish rebels. I was being followed by the**
 16 **Turkish authorities, because that's what they do.**
 17 **Right?**
 18 **So I was boots on the ground.**
 19 Q. You take a trip to Turkey?
 20 **A. Didn't stay in the European area and I**
 21 **didn't just take a trip to Turkey. I was meeting**
 22 **with Kurdish rebels.**
 23 Q. Okay. And that's all you did to build
 24 up Oasis at that point on September 26, 2014, is
 25 take a trip to Turkey and to give some money to

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1 Brian Weiner to build a website?
 2 **A. Oh, and compose a whole bunch of music,**
 3 **put together all sorts of videos. So it's not --**
 4 Q. So what music did you compose for Oasis
 5 at the time?
 6 Because Oasis wouldn't be the owner of
 7 that now, right?
 8 **A. Oasis would be --**
 9 Q. The owner of that music you composed?
 10 **A. I thought what we agreed earlier was**
 11 **that you were going to send him paperwork --**
 12 Q. No. But you just said that to build up
 13 Oasis you had composed a bunch of music.
 14 **A. Yeah. I guess music composed between**
 15 **June 26. But what is Oasis?**
 16 Q. Are these compositions that you have in
 17 your head or you actually wrote it down?
 18 **A. In my head.**
 19 Q. You haven't written anything down?
 20 **A. (No audible response.)**
 21 Q. Okay.
 22 **A. They're --**
 23 Q. So let's go to the next exhibit.
 24 Now, you said earlier you've never
 25 lived in -- I guess in the last two years you've

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1 never lived in L.A. for any regular period of time,
 2 correct?
 3 **A. Yeah.**
 4 Q. Okay. Let's mark this as Exhibit 15.
 5 I'm sorry. Let me just do that, because that's the
 6 one I've got to give you.
 7 (Whereupon the document referred
 8 to was marked Plaintiff's
 9 Exhibit 15 by the Certified
 10 Shorthand Reporter and is attached
 11 hereto.)
 12 (Off-the-record discussion.)
 13 BY MR. WITTENBERG:
 14 Q. It's a short email, so I'll talk while
 15 you're looking at it.
 16 It's from you, an email from you
 17 November 18, 2014 to Plaintiff, correct?
 18 **A. I don't remember writing this.**
 19 Q. Okay. But it is from your email
 20 address, thomasschoenbergersong@gmail.com, right?
 21 **A. Yeah.**
 22 Q. You may not remember writing it, but
 23 that is your phone number, right? (415) 632-7183?
 24 **A. Uh-huh.**
 25 Q. And it says you paid debts with some of

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1 her money, correct?
 2 **A. Well, she knew that.**
 3 Q. And it says you made investments with
 4 some of the money, right?
 5 **A. Yeah. But as a gift. But I did make**
 6 **investments.**
 7 Q. And those investments once again are
 8 your trip to Turkey and some money to Brian Weiner?
 9 **A. Yeah.**
 10 Q. And gambling away a few hundred thousand
 11 dollars?
 12 **A. But what else?**
 13 Q. That's all I really recollect from what
 14 you've been saying today.
 15 **A. Okay. There was more.**
 16 Q. Okay. What is there? Tell us?
 17 **A. Composition of music.**
 18 Q. In your head. So it's stuff you were
 19 thinking about.
 20 Did you pay yourself to think about this
 21 composition of music you're talking about?
 22 **A. If you only write music in your head, it**
 23 **doesn't go out to the world, it doesn't mean**
 24 **anything. I compose music that I put on YouTube.**
 25 **We had tens of thousands of views.**

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1 Q. You used Plaintiff's money to do that?

2 **A. Yeah. With Plaintiff's money?**

3 Q. Do you have receipts for any of the

4 money you spent for any of this?

5 **A. Yeah.**

6 Q. Where is the receipt for your trip to

7 Turkey? Where is the plane ticket evidencing the

8 trip?

9 **A. It's all in the bank statements that you**

10 **got.**

11 Q. We've asked you for evidence of anything

12 you've used Plaintiff's money on, and you haven't

13 produced us a shred of paper showing any trip to

14 Turkey was really taken, you haven't shown us a

15 shred of evidence that you spent money on your

16 YouTube page for the time period at issue.

17 Does that -- do you have evidence that

18 you went to Turkey? Is there a paper ticket?

19 **A. Yeah.**

20 Q. Okay. And you can print that and give

21 it to your attorney, right?

22 **A. I'm sure of it.**

23 Q. Okay.

24 **A. Yeah. There's evidence all through my**

25 **bank statements, Mr. Wittenberg. You might have**

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1 **overlooked them, you know.**

2 Q. You know, you can show me.

3 **A. I have --**

4 Q. You want to show me? We'll take a

5 second.

6 **A. To where?**

7 Q. Your trip to Turkey, did you pay with

8 cash or credit card?

9 How did you pay for your ticket to

10 Turkey?

11 **A. Credit card I'm sure.**

12 Q. Tell us what dates you went.

13 **A. I'm sorry.**

14 Q. I think you've been saying all afternoon

15 that you went in September, right?

16 **A. Yeah.**

17 Q. Do you remember if it was the beginning

18 of the month or late September?

19 **A. Later in September.**

20 Q. You went for how many weeks?

21 **A. I don't know. Two or three.**

22 Q. You don't know if it was two or three?

23 **A. No, I don't. I don't remember.**

24 Q. Okay. Did you fly direct from L.A. to

25 Turkey?

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1 **A. Yeah. Here it is. Eros Tours and**

2 **Travel Los Angeles.**

3 Q. Can you tell me what page and the Bates

4 number in the bottom --

5 **A. Sure. It's 0112.**

6 **So it's end of September. And then --**

7 **yeah, I do have a hotels.com, so I'm sure you can**

8 **find that.**

9 Q. Yeah. Sure. We'll get those from you,

10 as well.

11 **A. Okay.**

12 Q. And that's a credit card purchase on

13 9/26.

14 **A. Yeah.**

15 Q. For Eros Tours. What is Eros?

16 **A. Eros Tours is a plane flight, it's a**

17 **small plane flight.**

18 **So if you want to take a look in**

19 **particular you can turn the --**

20 Q. On 9/29 you were at the Best Western

21 Viejo.

22 **A. Yeah. 0118.**

23 Q. Okay. We're going to back up to 0118.

24 **A. Yeah. So if you look at 0118, there's a**

25 **list of them on 10/7 and --**

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1 Q. 0118?

2 **A. Yeah.**

3 Q. Okay.

4 **A. 10/7.**

5 Q. So now we're in October?

6 **A. Yeah. And if you see the center of it,**

7 **it goes into Istanbul again and again and again,**

8 **right there on 10/8 and, I guess, 10:7.**

9 Q. I see Amsterdam. I see something on

10 that.

11 **A. Yep. And then you looked at Istanbul.**

12 **Okay?**

13 Q. So it looks like you were in London.

14 Were you in London at this time period?

15 **A. No.**

16 Q. Okay. So, were you in Amsterdam during

17 this time period?

18 **A. Yeah. For a little bit. A couple days.**

19 **And then off to Turkey and then to Greece.**

20 **The purpose of Greece was that -- that's**

21 **where I figured it was not going to be an easier**

22 **time to train people to fight ISIS.**

23 Q. Where did you stay in Greece?

24 **A. Here. That's all along 10/14, various**

25 **places.**

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1 Q. Were you on an island in Greece?
 2 A. No.
 3 Q. Where were you in Greece?
 4 A. Near the Plaka, which is the historic
 5 part of town.
 6 Q. Okay. Were you in Athens, Greece?
 7 A. Yes.
 8 Q. For how long?
 9 A. A week.
 10 Q. We'll get more of this information from
 11 you later if we need.
 12 A. Okay.
 13 Q. Do you see on this exhibit we just
 14 marked as -- that single page is 16, is it?
 15 MR. PARMELEE: 14 is the last one I
 16 remember seeing.
 17 MR. WITTENBERG: Oh, Exhibit 15, it was.
 18 BY MR. WITTENBERG:
 19 Q. This is Exhibit 15 here. Somehow it
 20 came back to me.
 21 A. Okay.
 22 Q. Okay. Exhibit 15 I think we were
 23 talking about, you write that you lived in L.A.
 24 We now know that you never lived down in
 25 L.A. in 2014, correct?

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1 A. Yeah. And I wouldn't write this.
 2 Q. Okay. You didn't write it?
 3 A. Well, number one, I wouldn't write it,
 4 because why would I say I paid debts when she
 5 already knew that. I have things in tow. And then
 6 why would I say here's my cell phone, which she
 7 already had from the time that she was in August --
 8 you know, that doesn't sound right.
 9 Q. Do you still -- but we could get into
 10 your email box if we wanted to to see if it came
 11 from your email, correct?
 12 A. I do not recall writing this. And it
 13 seems odd to me with the content.
 14 I'm being completely honest with
 15 everything here.
 16 Q. I'm not surprised. I mean you said you
 17 never lived in L.A. This says you lived in L.A.
 18 I'm not surprised that you're saying that you are
 19 just shocked that it says that.
 20 But who would have written it if not
 21 you?
 22 A. Well, you know, this is --
 23 MR. PARMELEE: Objection. Calls for
 24 speculation.
 25 THE WITNESS: Speculation.

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1 MR. WITTENBERG: If he knows, he knows.
 2 MR. PARMELEE: You can answer.
 3 BY MR. WITTENBERG:
 4 Q. And you can answer.
 5 THE WITNESS: What?
 6 MR. PARMELEE: You can answer.
 7 BY MR. WITTENBERG:
 8 Q. Either you know or you don't know.
 9 A. I don't know for sure.
 10 Q. Okay. Does anybody have access to your
 11 account but you?
 12 And I know you've said Linda Barrett
 13 does.
 14 But is it Linda Barrett again the only
 15 one that had access to your account?
 16 A. The hack --
 17 Q. Am I correct that Linda Barrett has
 18 access to your account?
 19 A. She did.
 20 Q. Okay. Does anybody else -- has anybody
 21 else that you know of ever -- has anybody else that
 22 you know of had access to your email account?
 23 A. With my permission?
 24 Q. At any time, period.
 25 A. Yes. In May I was hacked. I don't know

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1 by who.
 2 Q. With your --
 3 A. May 2015.
 4 Q. Has anybody else had access to your
 5 account that you know of, the person's name?
 6 A. Not since 2007.
 7 Q. Let's mark this as Exhibit 16.
 8 Before you do, we talked earlier about
 9 who was on the board of Oasis.
 10 Am I correct that it was only Warren
 11 Zide? Or was anybody else ever on the board of
 12 Oasis?
 13 A. Nobody was ever on the board of Oasis,
 14 because we haven't formed the company.
 15 Q. Warren Zide has never -- he never agreed
 16 to be on the board of Oasis?
 17 A. He was considered and he had agreed when
 18 we formed the company that he would be on it.
 19 Q. Did anybody else ever agree to be on the
 20 board of Oasis?
 21 A. I had discussed with Plaintiff having
 22 Brian Weiner, and she did not feel that he was --
 23 Q. Okay. But besides Brian Weiner and
 24 Zide, anyone else come to mind?
 25 A. Not that I can think of.

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1 Q. Okay.

2 **A. I wanted to have a big powerful board.**

3 **You know, I put out names out there. But what**

4 **happened --**

5 Q. Do you remember -- you don't remember

6 telling Plaintiff that anybody in particular was on

7 the board?

8 **A. Oh, we had lots of discussions of who we**

9 **wanted, how -- you know, we wanted a super board.**

10 **Yeah. So, you know --**

11 Q. Okay. We'll mark this as Exhibit 16.

12 (Whereupon the document referred

13 to was marked Plaintiff's

14 Exhibit 16 by the Certified

15 Shorthand Reporter and is attached

16 hereto.)

17 THE WITNESS: I know we have to end this

18 as six, but is it possible to take a five-minute

19 break?

20 (Off-the-record discussion.)

21 BY MR. WITTENBERG:

22 Q. Okay. At the very top is an email from

23 you to Plaintiff on June 28, 2014.

24 Did you write that?

25 **A. It looks like me, yeah.**

354

1 Q. Okay. And again, here on June 28th

2 you're just discussing your vision for the business

3 with Plaintiff, correct?

4 **A. Yeah.**

5 Q. You're saying --

6 **A. I had come up with the name of Oasis,**

7 **and I was trying to say --**

8 Q. I know you want credit for that. You

9 said that earlier.

10 But you're saying that here,

11 "My vision is that we use a larger

12 model of having art, music and

13 poems and so forth under Oasis with

14 you as the leader. It is a pool

15 for the" --

16 So again this is June 28th, and it's

17 another email where you're discussing how you're

18 going to do business in Oasis with Plaintiff,

19 correct?

20 **A. Yeah.**

21 Q. Okay. Then we go to June 29th, the next

22 email, and you write again,

23 "As far as all you own and all you

24 have, I am putting you as the

25 executor of my estate."

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1 And of course I skipped some lines. But

2 do you see where it says, second sentence,

3 "In fact I'm putting you as the

4 executor of my estate."

5 **A. Yeah.**

6 Q. Okay. Did you ever do that?

7 **A. No. She ran out on me in late August.**

8 Q. Right. But at the time you said you're

9 putting her as the executor of your estate.

10 You never did, right? Not when you

11 wrote it, not a week later or not two months later

12 after your relationship ended, correct?

13 **A. Our relationship was for three -- three**

14 **weeks in August and she ran out on me. So I guess**

15 **there wasn't time to form Oasis officially or to do**

16 **a --**

17 Q. Your relationship actually began in late

18 2013, didn't it, when you started communicating over

19 Facebook?

20 **A. In -- the relationship?**

21 Q. Yeah. Late 2013?

22 **A. Late 2013 I communicated with someone I**

23 **thought was a man named Sam Moore. The relationship**

24 **when she divulged that she was a woman was in May**

25 **2014.**

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1 Q. Okay. So, your concept here is that by

2 telling her you're putting her as the executor of

3 your estate is that -- you know, trust me, it's a

4 relationship of trust, right? "I'm going to make

5 you the executor of my estate," you're telling her

6 to trust you, you're doing this business together,

7 that's the relationship you were fostering for --

8 you know, from, I guess you could say, all of 2014

9 up until this point, right?

10 **A. I knew I had to meet her physically, but**

11 **I felt like I was falling very deeply in love. And**

12 **I felt that if everything was right, I wanted to**

13 **marry her. And of course if you're going to marry**

14 **someone, you're going to make them the executor of**

15 **your estate.**

16 Q. You understood her to feel the same way

17 about you at the time?

18 **A. I think your -- I'm not a psychiatrist,**

19 **so I can't interpret her words. But I think she**

20 **wrote things to me that show -- show she was**

21 **interested.**

22 Q. So did you believe at the time that she

23 trusted you and loved you?

24 **A. I think she trusted me and I think that**

25 **she loved me, yes.**

<p style="text-align: right;">357</p> <p>1 Q. Okay. And you go down this email on 2 June 29th where you say -- really it's the very last 3 sentence here. You say, 4 "My task is to build Oasis for you 5 so it becomes as equal." 6 So again, you were going to be the 7 active participant in this investment vehicle, this 8 business, right? 9 That was when you were still getting 10 along in June 2014. 11 A. Well, I was thrilled with her. I was 12 thrilled with her into August. There was no fights 13 until -- 14 Q. And you were going to do business 15 together and -- 16 A. Oh, I was going to build her a super 17 company. 18 Q. Right. You're the active guy, you're 19 the businessman, right? 20 A. Not so much the active guy. I was -- 21 Q. Okay. 22 A. -- the monk tending the garden. 23 I think Brian Weiner was going to build 24 the actual website, and I was going to try to bring 25 the pieces together so she had an active board of</p>	<p style="text-align: right;">359</p> <p>1 read, 2 "Let's build the company. Let's 3 get good accountants to worry about 4 the money." 5 So again your premise all along as you 6 say here in countless emails that we're showing 7 today is that you were running a business together, 8 that you were going to take charge to do it, and it 9 was based upon the money she transferred to you just 10 about a week earlier, right? 11 A. I really can't make that clear 12 connection. You say we were running the business 13 together. I had never met her. She hadn't 14 generated a penny. 15 And had I told her when I talked to her 16 that I was putting out debts, that I was dealing 17 with crisis situations. 18 Q. And then you go down to the next email 19 July 1, 2014, and it says -- it's an email from you 20 again to Plaintiff. 21 You see that? 22 A. Uh-huh. 23 Q. Okay. And it says, 24 "This is what it sounds like when 25 we use real strings. Michael</p>
<p style="text-align: right;">358</p> <p>1 directors and it would be -- 2 Q. You were going to build Oasis? You were 3 going to hire Weiner to do this and someone else to 4 do that, but you were the active role? 5 A. I think it was mutual. It was -- 6 Q. But you don't say that in June here, you 7 don't say "together you and I will build this thing 8 together." You say "my task is to build it for 9 you," right? 10 At the time that's what you wrote? 11 A. My task is to build the infrastructure, 12 and then she will run it. 13 Q. Now, it doesn't say that? 14 A. It says let's build the company, which 15 means us, you know. We change the world. The 16 accountant's job is to worry about money. 17 Q. Uh-huh. You say, 18 "I had no use for the material" -- 19 Of course you did, because you had to 20 pay off a lot of debts, you say, right? 21 A. Yeah. 22 Q. And you say, 23 "Of course money is only a 24 vehicle." 25 And then again the paragraph you just</p>	<p style="text-align: right;">360</p> <p>1 Levine is now onboard." 2 And you're talking about being onboard 3 with Oasis, aren't you? 4 A. No. 5 Q. No? What are you talking about? 6 A. Michael Levine is now onboard with my 7 music. He's playing on my music. This is the Jimi 8 Hendrix of the violin. 9 Q. So there's no connection to Mike Levine 10 being onboard Oasis? 11 A. No. 12 Q. That's not what this meant? 13 A. No. 14 Q. Okay. 15 A. Michael Levine knew about Oasis from May 16 when the idea and concept of Oasis was simply my 17 music library. Because Michael has put his music 18 into libraries. 19 Q. So when you wrote "Michael Levine is 20 onboard," and this is just, again, a day or two, 21 three days after the prior email where you say "All 22 is yours. It's your company. I'll build it," and 23 you say "Michael Levine is onboard, who is a huge 24 name in Hollywood," this email has no connections at 25 all about it, in your mind?</p>

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1 **A. No. He was actually playing both violin**
2 **and what they call ciola, which is a viola that**
3 **sounds like a cello. So that had -- so what I was**
4 **doing was sending her actual music where I said "How**
5 **does this sound without synthesizer strings?"**
6 **And she was blown away by it.**
7 **And I can prove that to you because I**
8 **have the actual tapes and the -- and the date of the**
9 **tapes for it.**
10 **This is July 30th -- or July 1st, 2014.**
11 **I can show you tapes in my computer that are from**
12 **July 30th where we're going through everything.**
13 Q. Sure. So switching the topic briefly to
14 Facebook, when you were communicating with Plaintiff
15 and she was under the pseudonym Sam Moore, you said
16 she had no picture next to her name, correct?
17 **A. None that I remember.**
18 Q. To identify her as a woman versus a man?
19 **A. Yeah.**
20 Q. Okay. And you didn't learn she -- do
21 you remember when you learned she isn't a man?
22 **A. May. When I learned that she was a**
23 **woman?**
24 Q. Yes. Thank you.
25 **A. My best recollection is May. My**

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1 **recollection is that we were discussing --**
2 Q. May what?
3 **A. I don't know. But anywhere from the 1st**
4 **to the 31st.**
5 Q. Do you think May 31st?
6 **A. No. Anywhere from the 1st to the 31st.**
7 Q. And not until May. So the whole time
8 before that you thought she was a man.
9 All right. I'll put this on as an
10 exhibit. I think this will be -- I'm sorry.
11 Exhibit --
12 MR. PARMELEE: 17.
13 MR. WITTENBERG: I think 15 --
14 MR. PARMELEE: We just did 16, right.
15 MR. WITTENBERG: Okay. Thank you. This
16 will be Exhibit 17.
17 THE WITNESS: Mr. Wittenberg, after this
18 can we take just a five-minute break?
19 MR. WITTENBERG: Yeah. And then we'll
20 just take another 20 to 30 minutes, and then we'll
21 be done. I think we might be able to conclude the
22 deposition.
23 THE WITNESS: Thank you.
24 MR. WITTENBERG: Okay.
25 (Whereupon the document referred

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1 to was marked Plaintiff's
2 Exhibit 17 by the Certified
3 Shorthand Reporter and is attached
4 hereto.)
5 BY MR. WITTENBERG:
6 Q. Do you recognize the picture of Sam
7 Moore?
8 **A. (No audible response.)**
9 Q. Do you recognize the picture next to
10 your name Thomas Schoenberger?
11 **A. I don't -- well, the picture was just a**
12 **tattooed thing. Yeah.**
13 Q. That's your picture next to Thomas
14 Schoenberger, correct?
15 **A. Yes.**
16 Q. And do you now remember that that's the
17 picture next to Sam Moore's name on Facebook?
18 **A. Yeah.**
19 Q. And it's safe to say that's a feminine
20 picture, isn't it?
21 **A. Not really. It's an eye.**
22 Q. So you thought it might be a man?
23 **A. You never know. The name Sam Moore --**
24 Q. You knew her through Iona Miller,
25 correct?

364

1 **A. I don't remember.**
2 Q. Okay. But you think it wasn't until May
3 that you learned that Sam was Samantha or a woman,
4 right?
5 Is anything refreshing your memory or
6 are you sticking with that?
7 **A. I am -- I don't remember -- I need to**
8 **look through this. I remember when she sent a**
9 **picture --**
10 Q. Okay. That may be fine. But --
11 **A. Here where she says,**
12 **"I love my privacy. Do not share**
13 **my personal info."**
14 **Okay. So here's where she actually does**
15 **it. So when was that? That was May 21st, 2014,**
16 **where she first showed me her picture.**
17 Q. Well, that may be true. But --
18 **A. It's important.**
19 Q. If you see here on December 13th at the
20 very bottom, 6:26 P.M., She tells you to -- she
21 gives you a name, it says "Care of Isabella," does
22 she not?
23 **A. Yeah. Care of Isabella.**
24 Q. Okay.
25 **A. It's a name.**

365

1 Q. So she told you her name that night?

2 A. Yeah. But --

3 Q. Okay. So you --

4 A. No. She didn't tell me her name. She

5 just said care of Isabella.

6 What she did on May 21st, 2014, is that

7 she sent a picture saying "This is me and this is

8 what I look like." I fell in love.

9 Q. Okay. So then we'll move on to --

10 MR. WITTENBERG: Do you want to take a

11 break?

12 THE WITNESS: Yeah.

13 (Brief recess.)

14 BY MR. WITTENBERG:

15 Q. One thing I want to point out to you on

16 Exhibit 18 before we move on, if you have that?

17 MR. PARMELEE: 17?

18 MR. WITTENBERG: I actually have it as

19 18.

20 MR. PARMELEE: She's got it as 17.

21 (Off-the-record discussion.)

22 BY MR. WITTENBERG:

23 Q. If you'll look, Mr. Schoenberger, at

24 Exhibit 17, which is the Facebook pages --

25 A. Yes.

366

1 Q. And you go to the date that's marked

2 June 14th.

3 And just for some background, on June

4 14th you're essentially unemployed; is that right?

5 Or if you prefer the term, self-employed.

6 A. I'm looking at June -- July -- or

7 June 10th.

8 Q. There is -- if you get to the page

9 June 14th, and there's a number of them, but --

10 A. I see it.

11 Q. Why don't I flip it for you.

12 A. Okay.

13 Q. Yeah. We're on the right page. It's

14 the third up from the bottom.

15 And the question I have there is you

16 write a Facebook message to Plaintiff on June 14th

17 at 12:13 A.M. saying you better go because you're

18 off to meet a studio in Hollywood who wants to offer

19 you a deal.

20 And what are you -- is it true that

21 you're intending to have Plaintiff think that you're

22 doing business in Hollywood at this time?

23 A. Yes. And the studio that I was going to

24 see was through Brian Weiner. And it was a

25 gentleman named Jeremy and his business associate

367

1 named Lars, L-a-r-s, who is a tall Danish gentleman.

2 So, Brian had expressed an interest in

3 managing me. So the way that he described him is

4 that they had a studio, and furthermore, he was

5 developing an app, for lack of a better word, call

6 ping tank, P-i-n-g-t-a-n-k.

7 So I was off to Hollywood to -- to meet

8 them. And according to Brian, they could do things

9 for my musical career and make me a deal. I was

10 right up their alley, quote-unquote.

11 And also --

12 Q. Did you ever sign a deal with them, make

13 an offer to you that you signed?

14 A. No. Quite frankly, I found Jeremy to

15 be --

16 Q. Okay.

17 A. -- shifty.

18 Q. Let's go -- let's try and get through

19 some of these.

20 A. Okay. And, Mr. Wittenberg, I wanted to

21 also say one thing, too, is when Isabella said "I

22 want to pay you via PayPal for a CD," she didn't put

23 a last name.

24 And I didn't know, it could have been

25 Mr. Isabella.

368

1 What I'm trying to say is I was not

2 cognizant of what this person did until she sent a

3 picture of herself on May 21, 2014.

4 Q. Okay. Let's look at -- I'm going to try

5 to put these out -- this is an email number -- let's

6 see.

7 So let's put on -- let's just put all

8 these on for now. I think it will be easier. And

9 then we can flip them as necessary.

10 So these are -- I'm going to put it on

11 as Exhibit 18. And it's going to be TS production 1

12 through, I guess, 53.

13 (Whereupon the document referred

14 to was marked Plaintiff's

15 Exhibit 18 by the Certified

16 Shorthand Reporter and is attached

17 hereto.)

18 BY MR. WITTENBERG:

19 Q. Okay. I think we marked this as

20 Exhibit 18. And let's just -- here on page TS 1, at

21 the bottom middle down it's a June 17, 2014 email

22 that you wrote to Plaintiff, right?

23 A. Uh-huh.

24 Q. You're giving her your bank details,

25 correct?

369

1 **A. Uh-huh.**
 2 Q. You see that?
 3 **A. Yeah.**
 4 Q. And if you turn the page, it says,
 5 "I am not the in habit of making
 6 promises or receiving money."
 7 Now, you're making a promise to her in
 8 connection with receiving the money, are you not?
 9 Isn't that what you're saying here.
 10 **A. No. I'm making a statement saying I'm**
 11 **not in the habit of making promises or receiving**
 12 **money.**
 13 Q. Okay.
 14 **A. I have a habit of not promising to**
 15 **people what -- what I can't deliver. So that was**
 16 **kind of a broad --**
 17 Q. But you were in fact receiving money
 18 even though you're not in the habit of it, and then
 19 you see in the same sentence you're saying, "I am
 20 not in the habit of making promises," which you --
 21 which you make, because you see in the next line,
 22 "I love you and promise to do well
 23 by this."
 24 So you are making a promise to do well
 25 by the money, correct.

370

1 **A. I love you and promise to do well by**
 2 **this.**
 3 Q. By the receiving of the money, correct?
 4 **A. Yeah.**
 5 Q. Okay.
 6 **A. Compose, all that, yeah.**
 7 Q. Then if we go to -- I think we already
 8 covered that.
 9 We'll go to page five. And you see at
 10 the bottom you have a June 25th email from you to
 11 Plaintiff. And in the last two sentences at the
 12 bottom of the page on TS 5, you say you're setting
 13 up right now to have equity in your music rights and
 14 in a company's being built.
 15 So here again on June 25th you're
 16 telling Plaintiff that you're -- she's going to have
 17 equity in your music rights and in companies being
 18 built, because that's how you're using her money,
 19 correct?
 20 **A. Well, it's not -- not necessarily how**
 21 **I'm using her money. But I loved her and so, yeah,**
 22 **I went -- I said "I wanted you to have equity in my**
 23 **music rights."**
 24 If you place one song in a major film,
 25 it's six figures, sometimes seven figures. So,

371

1 **absolutely. And companies being built, that can,**
 2 **you know --**
 3 Q. If you go on to the next page, it
 4 says -- and you see in the first paragraph last
 5 sentence,
 6 "I always belief in ROI."
 7 "ROI" is an acronym for return on
 8 investment, isn't it?
 9 **A. Yes.**
 10 Q. So you're again saying "I represent to
 11 you there will be return on investment," correct?
 12 **A. Oh, I felt that if we had run with**
 13 **Oasis, and it had actually been with Plaintiff, it**
 14 **could be big business money.**
 15 Q. And even in the next paragraph you
 16 represent that the money should multiply. That is
 17 what shrewd investment will do?
 18 **A. Yeah.**
 19 Q. So the goal all along for you and
 20 Plaintiff is to invest the money and grow it, right?
 21 **A. This was after she had given it to me as**
 22 **a gift, and I was so blown away by the gift, the**
 23 **first thing that I did was put out fires.**
 24 Q. Again, the representation you make here
 25 is that the money will multiply because that's what

372

1 true investment does.
 2 Now, you represent that right here.
 3 **A. Yeah.**
 4 Q. Was it true in your mind when you made
 5 this representation to Plaintiff?
 6 **A. I expected my music to be huge at that**
 7 **point.**
 8 Q. Not the music, but the true investment?
 9 **A. Well, we're talking about music rights**
 10 **right here. The only reason why it was cut off is**
 11 **that another page --**
 12 **"I am setting up right now to have**
 13 **equity in my music rights."**
 14 **And then I put,**
 15 **"And in companies being built."**
 16 **So that's secondary. So obviously this**
 17 **is the first part of a sentence and it has to do**
 18 **with music rights.**
 19 Q. Well, it doesn't say anything about
 20 music, does it?
 21 **A. Well, it --**
 22 Q. It says "music rights and in companies
 23 being built," right?
 24 **A. Right.**
 25 Q. And that's Oasis and that's in other

373

1 companies that the money is being used for?

2 **A. Oasis was going to be primarily an**

3 **arts -- yeah.**

4 Q. So you're stepping away -- today you're

5 walking -- you're backing away from the

6 representation you made here on June 25th?

7 **A. Actually, no. Mr. Wittenberg, I've even**

8 **said today with -- with a stenographer here that I'd**

9 **be happy to give her --**

10 Q. No, no, no, no.

11 **A. -- 50 percent of my music.**

12 Q. I'm talking about this representation

13 you made on June 25th, 2014, she can have equity in

14 your music and in the companies being built.

15 But that never happened, right?

16 You never built any companies and you

17 never gave her any equity; isn't that right?

18 **A. Every --**

19 Q. Is it?

20 **A. Yes, but --**

21 Q. Did you give -- yes, but no? Is that

22 where we're going again? Okay.

23 **A. You would have to look at her response.**

24 **That's all I'm going to say. She wouldn't respond.**

25 **Every time I was saying I'll do this, I'll do this,**

374

1 **look at her response. She didn't say "That sounds**

2 **good. Let's set up a contract."**

3 Q. Okay. So, again, if we go to page

4 TS number 7, middle of the page, June 24th, another

5 email, soon you write to Isabelle, if you see it's

6 in the second sentence,

7 "You will be principal in something

8 big. You will have triple return."

9 Okay. So again you're representing to

10 her you're going to use her money to have another,

11 you know, triple return, correct?

12 **A. That's what I wrote. And she didn't**

13 **acknowledge it. All she said was "no strings**

14 **attached."**

15 **That's what she continually said to me.**

16 Q. She writes back to you and she doesn't

17 say, you know, anything other than what she says,

18 right?

19 "You are welcome."

20 Okay? That is all she says here, isn't

21 it? Because she's coming to visit you, according to

22 this email, right? But --

23 **A. Yeah.**

24 Q. She doesn't say to you in this email

25 which you keep suggesting, "No, no, Thomas, I'm not

375

1 a principal, I won't be a principal, I don't want

2 triple return," what you talked about? She didn't

3 write that, did she?

4 **A. She didn't write back "That sounds**

5 **agreeable with me."**

6 Q. Okay.

7 **A. You know.**

8 Q. But she did transfer the money to you,

9 right?

10 **A. She gave it to me as a gift, no strings**

11 **attached. She wrote that.**

12 Q. So let's move on and see how many more

13 times.

14 **A. It also says,**

15 **"Because I owned nothing but what I**

16 **have given you."**

17 **That's TS 0013.**

18 Q. Uh-huh. Go on.

19 **A. "And the gift remains the same.**

20 **And I can walk away your friend.**

21 **Who am I, a virtual stranger."**

22 Q. Uh-huh.

23 **A. So, the gift remains the same. So, she**

24 **continually used the word "gift." And that would be**

25 **on TS 0013.**

376

1 Q. Uh-huh. Right.

2 She goes on to say that,

3 "I kept it as a draft not to be

4 tempted to use any of it, but keep

5 it for the Oasis."

6 Correct? You see that?

7 **A. "The gift I made you, Baby, is**

8 **really all I have. Keep it as a**

9 **draft not to be tempted to use" --**

10 Q. She kept it as a draft and she's using

11 it for Oasis, correct?

12 **A. But keep it for the Oasis.**

13 **Yes. But she said "a gift I made you,**

14 **Baby."**

15 **That doesn't sound to me like she's**

16 **seeking a bilateral contract.**

17 Q. Okay.

18 **A. She also said "I think I can make**

19 **flowers appear and bloom."**

20 Q. Uh-huh. Right.

21 So the -- not -- walking away as your

22 friend separates the business relationship from the

23 personal relationship, right?

24 **A. I didn't walk away from Oasis.**

25 Q. I didn't say that. I'm just saying that

377

1 you're quoting language that she wrote you.
 2 And the point here is she's saying she
 3 can walk away your friend, but at least there would
 4 be Oasis, a business relationship, right?
 5 **A. That's on 13?**
 6 Q. Well, that's, yeah, in general what it's
 7 saying, right?
 8 **A. No. I don't think so.**
 9 Q. Okay.
 10 **A. The gift remains the same. And then in**
 11 **parentheses,**
 12 **"Sure papers can be amended to**
 13 **reflect that and I can walk away**
 14 **your friend."**
 15 **So what she's saying is the gift remains**
 16 **the same and I can walk away your friend, not that**
 17 **we still have a business relationship.**
 18 **What you'll see is that while I**
 19 **continually tried to bring up Oasis and continually**
 20 **wanted in all my heart to make it go, I think I was**
 21 **the one saying let's do this.**
 22 Q. One thing we know for sure, can we at
 23 least agree that here on TS 13, she's telling you
 24 that she gave you all she owned, her life savings,
 25 essentially?

378

1 It says,
 2 "I own nothing but what I have
 3 given you."
 4 The second sentence.
 5 **A. "I own nothing but what I have**
 6 **given you."**
 7 **But she was -- I wasn't sure what she**
 8 **meant and I talked to her right after that and we'll**
 9 **be able to get phone records, she also says,**
 10 **"All I have is who I am."**
 11 Q. Correct. And she's giving you
 12 everything -- she gave you everything she owned and
 13 she wanted to keep it for Oasis. That's really what
 14 13 says.
 15 But you're ignoring that part of it?
 16 **A. No, no, no, no. Sir, I'm not ignoring**
 17 **it. When I had met with her she had talked about**
 18 **how she had had jewels and she had had antique**
 19 **furniture and whatnot.**
 20 **But, no. I don't know what she meant by**
 21 **this. But she did write it.**
 22 **And I also do recognize that I did**
 23 **receive this email. So I'm not trying to dodge**
 24 **anything. But you're asking me to interpret her**
 25 **writing.**

379

1 **She also said in the earlier email that**
 2 **she can make flowers bloom.**
 3 **So does that mean that she is a**
 4 **horticulturist or does that mean that she is a**
 5 **delusionist, a conjurer.**
 6 Q. Okay. So the -- TS 20 talks about when
 7 Isabelle Plaintiff came to visit.
 8 Do you recall now when you look at this
 9 TS 20 that she didn't come in August, as you stated
 10 earlier; that she actually came in July?
 11 **A. How does it show that she was here in**
 12 **July?**
 13 Q. You see where it says in the middle of
 14 the page, Monday July 14th at 7:20 A.M., Plaintiff
 15 writes to you,
 16 "Don't worry. Needs to be done at
 17 the latest 72 hours prior to flight
 18 booking."
 19 And she is letting you know that she
 20 needs to get prepared for her flight.
 21 **A. Yeah. Okay,**
 22 **"So I need to provide U.S.**
 23 **authorities with an address in the**
 24 **U.S. if I can use a visa."**
 25 **So that would be on Monday July 14th.**

380

1 **Okay. So, yeah. It looks to me like then she came**
 2 **on the 21st. Is that right? July 21st. All right.**
 3 Q. So your -- okay. So let's move on to
 4 page 21.
 5 **A. Okay.**
 6 Q. On page 21 Plaintiff writes to you at
 7 7:15, July 15, '14,
 8 "Delaware, funny. This is where I
 9 was advised to set up a business
 10 years ago."
 11 She goes on,
 12 "Baby, I know and trust that you
 13 are doing great things."
 14 You see that?
 15 **A. Uh-huh.**
 16 Q. What did you think she meant when she
 17 told you that?
 18 **A. I didn't understand her sentence,**
 19 **because she said,**
 20 **"Baby, I know and trust you are**
 21 **doing great things. Take."**
 22 **And then dot, dot, dot. I told her**
 23 **before anything that contributes to your well-being**
 24 **and happiness has my blessings.**
 25 **When I see -- when I say "be well" and**

381

1 then it appears to be cut off, so I don't think that
 2 we have the full email here, Mr. Wittenberg.
 3 Q. Well, this comes from your records. So
 4 maybe you can produce the full --
 5 A. Yeah.
 6 Q. But, to be clear, you never responded to
 7 her and said,
 8 "No. I'm gambling with the money."
 9 Right? You never disavowed her of her
 10 belief that you were doing great things with the
 11 money, correct?
 12 A. Oh, I think that -- at that point I was
 13 also dodging a dedicated stalker. I think I was
 14 dealing with --
 15 Q. You were also being prosecuted for being
 16 a stalker at this time, right?
 17 A. Well, no. I was being prosecuted at
 18 this time for communicated with a government
 19 official, and I was being prosecuted by a District
 20 Attorney who had accused me of making multiple phone
 21 calls which turned out that I didn't make any.
 22 So there was something pretty funny at
 23 that time.
 24 Q. And if we go down the page, just to keep
 25 moving on with TS 22 --

382

1 A. Sure.
 2 Q. The response we just read from Plaintiff
 3 that "Delaware, funny, that's a business where I was
 4 set up -- was advised years ago" -- that's in
 5 response to the email we looked at earlier where you
 6 told her you're setting up an L.L.C. called Oasis in
 7 Delaware.
 8 You see that?
 9 A. Oh, yeah.
 10 Q. So she is clearly responding to you
 11 saying,
 12 "Yeah, okay. Yeah. You're setting
 13 up that business in Delaware.
 14 That's where I was advised to do it
 15 before. I know you. I trust you.
 16 You're doing great things."
 17 A. Yeah. Mr. Wittenberg, I've been a
 18 composer since I was four. So I was really really
 19 excited to say, wow, we can do absolutely wonderful
 20 things.
 21 So what I was bringing to the table was
 22 all those years of composing music which shall be
 23 timeless which will exist longer -- longer than
 24 everybody in this room, except for Jay.
 25 And, you know, bottom line is I was also

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1 bringing connections and I -- I wanted to play
 2 architect with this thing. And I wanted us to be a
 3 huge business, absolutely. I think it's clear with
 4 every email after every email.
 5 Q. Okay. If we go to TS 27.
 6 A. Yep.
 7 Q. You say on July 20th at 1514, and here
 8 you're using a different email. Before you were
 9 using thomasschoenbergerson@gmail?
 10 A. Yeah.
 11 Q. Now you were using
 12 thomasschoenbergermusik@gmail.
 13 A. Yeah.
 14 Q. Do those go to the same place? Do you
 15 have one forwarded to the next?
 16 A. So.
 17 Q. So you check when you log on two
 18 different accounts? They're not connected at all?
 19 A. They're not connected all and one
 20 doesn't forward to the other so --
 21 Q. You say here in this email,
 22 "I have computers and such. I'm
 23 bringing the laptops."
 24 How many laptops do you recall having?
 25 A. At that point three.

384

1 Q. Okay. Were they all yours?
 2 A. Yeah.
 3 Q. You owned them all?
 4 A. Yeah. One of them was, you know, kind
 5 of old.
 6 Q. When -- do you still have these laptops?
 7 A. I got rid of the one where I was doing
 8 most of my work on because it was hacked to death.
 9 I didn't even want to get on it.
 10 Q. When did that happen?
 11 A. May, 2015.
 12 Q. What about the other two laptops you
 13 had?
 14 A. The other two are kind of dormant. I
 15 have one that I actually never -- never used, and
 16 lately I just use Linda's.
 17 Q. Okay. Have you searched those laptops
 18 for any emails?
 19 A. Yeah.
 20 Q. Okay. And you haven't found any?
 21 A. Yeah. The one that got hacked, it had
 22 gotten to the point where they had captured my PGP
 23 signature. PGP is an encryption signature that has
 24 up to a million bits.
 25 So that was -- that meant that they

385	<p>1 could go into bank accounts and --</p> <p>2 Q. If you look at the next email here a</p> <p>3 couple down on July 20, 2014 at 1458, you wrote,</p> <p>4 "I know you're packing, but could</p> <p>5 you give me three paragraphs about</p> <p>6 Oasis that you want the site to</p> <p>7 do."</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. And so why are you asking her to</p> <p>10 give you paragraphs about Oasis?</p> <p>11 A. Because the -- the thing that -- the</p> <p>12 original idea of Oasis was a music library. So it</p> <p>13 had to do specifically with my music.</p> <p>14 After my conversations were it</p> <p>15 Plaintiff, she had said, "Well, I could imagine</p> <p>16 poetry, I could imagine this and that."</p> <p>17 And then I thought, "Why not make it</p> <p>18 like a cyber salon?" She is from Paris, salon as --</p> <p>19 s-a-l-o-n. She is from Paris. She has indicated to</p> <p>20 me that she's been educated at the finest French</p> <p>21 schools. She's a multi-linguist. We all know</p> <p>22 that --</p> <p>23 Q. Are you a multi-linguist?</p> <p>24 A. I speak some, a little here and there.</p> <p>25 Q. Are you fluent in another language?</p>	387	<p>1 called Oasis, right?</p> <p>2 A. Yeah.</p> <p>3 Q. And the founder and owner of that</p> <p>4 business that you're using the money to start up is</p> <p>5 none other than Plaintiff, right?</p> <p>6 A. Well, yes, but. I want to make it nice</p> <p>7 for you.</p> <p>8 My original theme of Oasis was as a</p> <p>9 music library. That is from late 2012, December</p> <p>10 2012.</p> <p>11 But then when she introduced herself</p> <p>12 and -- you know, the Plaintiff is brilliant. She's</p> <p>13 very sophisticated, very creative. That's where the</p> <p>14 idea of making a cyber salon made sense --</p> <p>15 Q. Let me ask you, did you ever spend money</p> <p>16 to buy a domain name?</p> <p>17 A. For --</p> <p>18 Q. A website.</p> <p>19 A. With Oasis?</p> <p>20 Q. Yeah.</p> <p>21 A. No. Because there's a band called</p> <p>22 Oasis. So that's where we started to --</p> <p>23 Q. It all comes together.</p> <p>24 So you never spent any -- you never had</p> <p>25 a domain name for the company?</p>
386	<p>1 A. Some. But like what --</p> <p>2 Q. Is that a "yes" or a "no"?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. Let's focus on what you say here.</p> <p>5 It says,</p> <p>6 "I paid the best developer."</p> <p>7 Who are you referring to there?</p> <p>8 A. Let's see. I paid the best developer.</p> <p>9 That's Brian.</p> <p>10 Q. Brian Weiner?</p> <p>11 A. Yes.</p> <p>12 Q. Is it Weiner or Weiner?</p> <p>13 A. Weiner.</p> <p>14 Q. Okay. And --</p> <p>15 A. Good one.</p> <p>16 Q. You suggest to -- you say -- you write</p> <p>17 here that,</p> <p>18 "I suggest that you go by Isa as</p> <p>19 owner/founder."</p> <p>20 So again this is another time you're</p> <p>21 clearly conveying a message that you paid somebody</p> <p>22 using -- I think using the money she transferred to</p> <p>23 you, right?</p> <p>24 A. Yeah.</p> <p>25 Q. And you're doing it to set up a business</p>	388	<p>1 A. No.</p> <p>2 Q. If we turn the page -- did you ever have</p> <p>3 Brian Weiner draft any code?</p> <p>4 MR. PARMELEE: Objection. Calls for</p> <p>5 speculation.</p> <p>6 He doesn't know what Brian Weiner's</p> <p>7 staff did.</p> <p>8 BY MR. WITTENBERG:</p> <p>9 Q. Did you ever pay Brian Weiner for code?</p> <p>10 A. I -- when I gave him money originally he</p> <p>11 was in the midst of all sorts of things. So I was</p> <p>12 paying him for work to be performed, but we weren't</p> <p>13 specific about it. But all --</p> <p>14 Q. Because that's -- that happens</p> <p>15 sometimes. You just -- you transfer money and you</p> <p>16 know that he's going to do some work and that's your</p> <p>17 agreement, just an oral agreement, right?</p> <p>18 A. He had actually met with both of us,</p> <p>19 Plaintiff and I --</p> <p>20 Q. Again, focus in, please.</p> <p>21 Did you have a written agreement for</p> <p>22 Brian Weiner -- Weiner to do your code, to build</p> <p>23 your website?</p> <p>24 A. To build us --</p> <p>25 Q. A website?</p>

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1 **A. I wanted him to meet with Isabella --**
2 Q. Did you have a written agreement with
3 Brian Weiner --
4 **A. I signed no written agreement.**
5 Q. But did you have an agreement with him
6 even though you didn't sign a written agreement?
7 **A. We never came up with an agreement.**
8 Q. But you paid him money?
9 **A. Yeah.**
10 Q. Did he give you your money back?
11 **A. No.**
12 Q. Why not?
13 **A. Because when I originally gave him the**
14 **money, his lease was up on his car and his car was**
15 **about to be taken. He was someone that I've known**
16 **since 1970's who was in real hard shape and I said**
17 **we'll make it up some way.**
18 **So I think I gave him money in -- you**
19 **know, in June at some point. And then when -- when**
20 **we came up with this thing saying Oasis can be a**
21 **cyber salon, then Brian actually put a lot of work**
22 **into developing what was going to be a website,**
23 **developing how it works.**
24 **I'm not a tech guy. I'm not a web**
25 **developer.**

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1 Q. Did Brian ever deliver any website pages
2 to you?
3 **A. I think he sent me a cover page.**
4 Q. So you basically -- what you're
5 testifying to now is you gave Brian \$12,500, right?
6 **A. Yeah.**
7 Q. And it was for him to do development of
8 a website for Oasis, correct?
9 **A. (No audible response.)**
10 Q. And -- is that correct?
11 **A. It was not -- to be specific, it was not**
12 **originally for anything. It was to help him out and**
13 **say, look -- because I could have found a web**
14 **developer for \$1,000 to develop a website.**
15 **I was thinking more in terms of let's**
16 **make this bigger.**
17 **The bottom line is I wanted both**
18 **Plaintiff and Mr. Weiner to develop this. My job**
19 **was going to be to go out and get the connective**
20 **tissue, find directors and producers. In fact,**
21 **with --**
22 Q. Are you testifying that you gave the
23 money to Brian Weiner because he's just a good
24 friend of yours, you were trying to help him out of
25 a jam?

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1 **A. No. I would say that I loaned him money**
2 **for work to be performed. And that work was --**
3 **specifically, Mr. Wittenberg, we were working on a**
4 **previous deal in Dubai which had to do with him**
5 **outfitting conference halls for the largest oil**
6 **company in Dubai.**
7 **Secondly, I was coming onboard as the**
8 **executive vice president of business development for**
9 **his company.**
10 Q. You were coming onboard for his company?
11 **A. Yes. He even printed cards.**
12 Q. Okay. So you were getting a job, he was
13 going to pay you a salary?
14 **A. No. He was not going to pay me a**
15 **salary. It was going to be whatever I brought into**
16 **the company as far as business --**
17 Q. So now you said you gave him a loan of
18 \$12,500?
19 **A. I didn't treat it as a loan. I treated**
20 **it as an investment in his company.**
21 **And it's -- you have to understand that**
22 **with Mr. Weiner, he's worked with all the best**
23 **companies in Hollywood, the top ones, whether it was**
24 **Warner Brothers, whatnot.**
25 **So I assumed with his --**

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1 Q. And you said he was on hard times,
2 right?
3 **A. I -- no. What I said was he had a lease**
4 **coming up with his Corvette. And I don't know about**
5 **hard times. I know that he didn't have money then.**
6 **So --**
7 Q. How did you know he didn't have money
8 then?
9 **A. He told me.**
10 Q. Okay. He had no money to pay for his
11 lease at the time?
12 **A. He had the lease coming up, so you get**
13 **the balloon, you know.**
14 Q. So you were nice -- you were being a
15 nice guy, you gave him the money, and you called it
16 a loan/investment?
17 **A. Well, it wasn't like that. It was at**
18 **the same time that I had given him money we had**
19 **things coming together. He -- we were working on**
20 **what we thought was a \$50 million loan.**
21 Q. I thought you were going to get that
22 from him?
23 **A. No. The man who was going to secure**
24 **that loan was Lamont Faust.**
25 Q. Okay. Did Mr. Weiner ever tell you that

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1 he owed money to the I.R.S.?
 2 **A. That he did? No.**
 3 Q. Did you ever tell Plaintiff that
 4 Mr. Weiner owed money to the I.R.S.?
 5 **A. No.**
 6 Q. You don't remember that?
 7 **A. No.**
 8 Q. When did you first meet Mr. Weiner?
 9 **A. 1977. No. Mr. Faust --**
 10 Q. You were childhood friends?
 11 **A. Yeah.**
 12 Q. You did favors for each other like the
 13 one you're describing for \$12,500?
 14 Would you call that a favor you did for
 15 him?
 16 **A. No.**
 17 Q. So it wasn't a loan, it wasn't an
 18 investment. Catch me if I'm wrong.
 19 It wasn't a loan, correct?
 20 **A. No.**
 21 Q. It wasn't an investment, correct?
 22 **A. It was an investment.**
 23 Q. It was an investment. Was it an
 24 investment in his business?
 25 **A. Yeah.**

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1 Q. Okay. Did -- has he ever paid you back?
 2 **A. No.**
 3 Q. Okay. Was there any paperwork to
 4 evidence what you're saying to us right now?
 5 **A. I think he had sent me something that I**
 6 **never signed, because it then went towards Oasis.**
 7 **But, you know, Mr. Wittenberg, now --**
 8 Q. So you made an investment into his
 9 business but never got any paperwork but --
 10 **A. Well, I got business cards.**
 11 Q. Okay. And so that -- that evidenced
 12 your investment?
 13 **A. Can I go back to something that you**
 14 **said? Because I just got a recall.**
 15 **You had said that -- something about the**
 16 **I.R.S. with Mr. Weiner.**
 17 Q. Yep.
 18 **A. And I do remember that Mr. Faust, one of**
 19 **the excuses he gave saying that it was going to take**
 20 **longer and longer to get money was because there**
 21 **were back taxes owed for employee taxes. He didn't**
 22 **specify a number. And he had no documentation to**
 23 **show it up.**
 24 **And I said "That's between you and**
 25 **Brian." Because they were communicating, and I did**

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1 **not want to get in the way of a rather large loan**
 2 **coming to fruition.**
 3 Q. Okay.
 4 **A. That's all that I remember. So it was**
 5 **hearsay and innuendo from Mr. Faust, who we now know**
 6 **is convicted of fraud.**
 7 Q. Let's turn to TS 30, and it goes all the
 8 way to TS 53.
 9 When you look at TS 30, does that look
 10 familiar to you? Have you seen this document?
 11 **A. You know, I don't remember seeing this**
 12 **document. And I believe Mr. Weiner and I had a talk**
 13 **about this, and he said, "Oh, I've sent you**
 14 **something, I've sent you something." And for**
 15 **whatever reason I couldn't get it.**
 16 **So there were issues with emails.**
 17 Q. Okay. Do you know where this document
 18 came from that we're looking at right now?
 19 Did you ever --
 20 **A. Obviously it's IllusionQuest.**
 21 Q. Did it come -- was it ever in your
 22 possession, do you know?
 23 **A. Could it have been sent to me via email?**
 24 **Could have.**
 25 Q. So your testimony here today is you have

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1 no recollection of where this document comes from;
 2 is that right?
 3 **A. My recollection is I've never seen so**
 4 **many pages. I saw him pull up a computer at Lure**
 5 **Restaurant and show both the Plaintiff and I what he**
 6 **was doing online.**
 7 **I don't think that you can find -- and I**
 8 **think this is a good point, Mr. Wittenberg. I think**
 9 **that he -- when he sends something he can tell if an**
 10 **email has been opened. So he can actually give you**
 11 **verifiable proof of whether he sent me this in a**
 12 **link and whether it was opened.**
 13 Q. Okay. You see "TS" at the bottom,
 14 right?
 15 Do you understand what that stands for?
 16 **A. I'm sure Thomas Schoenberger.**
 17 Q. Okay. This is a document that you
 18 produced to us through your attorney in discovery.
 19 That means that it was in your possession before you
 20 produced it to us.
 21 Do you remember that?
 22 **A. Could have been. But did I open it?**
 23 **That's what you asked me, if I -- if I read this.**
 24 Q. Do you see the front cover says "Oasis"
 25 in the picture (indicating)?

<p style="text-align: right;">397</p> <p>1 A. It's in black and white, yes. 2 Q. It's on TS 30? 3 A. Uh-huh. 4 Q. And you see toward the middle of the 5 bottom "Oasis the Online Sanctuary for Creative 6 Genius"?" 7 A. Yes. 8 Q. And you see it's created for Isabelle 9 and Thomas? 10 A. Yeah. 11 Q. On July 25th, '14. 12 A. So she would have been in town for five 13 days. Okay. 14 Q. This is produced by Brian Weiner, is 15 that -- is that correct? 16 A. That is his company, yeah. 17 Q. And is this all you ever received from 18 him in exchange for the \$12,500 you gave him? 19 A. You know, I'm here to keep it absolutely 20 honest. I don't remember even reading this. So if 21 I sent it to my attorneys, I sent it in the form of 22 a link that was never opened. 23 Q. Okay. 24 A. Which happens. You know, I get a lot of 25 emails.</p>	<p style="text-align: right;">399</p> <p>1 speculation as to changes that weren't in his 2 control. 3 BY MR. WITTENBERG: 4 Q. It says "Digital recording of all 5 appropriate sessions in Oasis." 6 But you're telling us now this is the 7 same exact thing he did for a different project for 8 you, correct? 9 A. Not for me. Mr. Wittenberg, what he did 10 is I introduced him to someone, this Sheikh Salim, 11 and he had gone to Dubai, he had had a meeting with 12 a -- the largest oil company, and the idea was to 13 outfit conference rooms with the ability to record 14 and also the ability to transcribe in different 15 languages realtime. So it was pretty -- it's pretty 16 amazing. 17 So I -- I don't know his frame of mind. 18 But he could have been very excited about throwing 19 in his concepts into Oasis. 20 I see there's a lot of pretty pictures 21 here. 22 Q. So let's turn to Exhibit 19, the one I 23 just put in front of you. 24 A. Okay. 25 Q. This is an email, as your attorney looks</p>
<p style="text-align: right;">398</p> <p>1 Q. Okay. 2 A. It's good, though. 3 MR. WITTENBERG: Let me just mark this 4 as Exhibit 19. 5 (Whereupon the document referred 6 to was marked Plaintiff's 7 Exhibit 19 by the Certified 8 Shorthand Reporter and is attached 9 hereto.) 10 THE WITNESS: May I speak? This I 11 remember from -- 12 BY MR. WITTENBERG: 13 Q. Are you ready? 14 Okay. Go ahead. 15 A. Page TS 0047 actually was not part of 16 Oasis. This was what Mr. Weiner had produced for 17 Dubai when he went over there, which was a 18 conference room recording platform. 19 So I think that perhaps Mr. Weiner was 20 incorporating -- 21 Q. So I think what you're saying is this is 22 nothing new for Oasis other than the cover page, and 23 he changed the name here, if you see at the top of 24 the page it's showing on TS 47 -- 25 MR. PARMELEE: Objection. Calls for</p>	<p style="text-align: right;">400</p> <p>1 at it, on March 20, 2015, at the very top, and it's 2 something from you to Jay Parmelee, your attorney. 3 Do you remember why you sent this, 4 called "Drone Project" to your attorney? 5 A. Yes. Because I had been told that there 6 was speculation that I did not compose music, that I 7 didn't have any scientific interest, that I was not 8 trying to invent new things. 9 Q. Okay. And so this is an email, though, 10 you're forwarding to Jay Parmelee your attorney and 11 you're saying, 12 "Brian, we should do both." 13 Why are you calling your attorney Brian? 14 Why are you writing a letter -- 15 A. This was a forward from a screenshot 16 that I had taken. And so this was one thing that I 17 had which was blind cc'd to my son. My son had to 18 go find it. 19 And Light Ventures, Inc. is the email of 20 Brian Light right here (indicating). And so you can 21 see where he says, 22 "Here is a sketch of what a deacon 23 drone would look like. Food for 24 thought. Tracks on bottom." 25 So on and so forth. The company I</p>

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1 approached with this is the Robbins Company. So
 2 this kind of -- I don't have a date on this, but
 3 kind of authenticates what I was saying about
 4 Mr. Brian Light and a team of scientists, because he
 5 actually mentions the manufacturers of these there.
 6 So thank you for this.
 7 Q. So, Mr. Light, this is his email
 8 address, lightventuresinc@gmail.com?
 9 A. It was.
 10 Q. Okay. Is it -- what do you mean it was?
 11 A. I had sent an email to him, and I didn't
 12 get a response on it. However --
 13 Q. Do you have -- let me ask, you produced
 14 this document. You understand that, right?
 15 A. Yeah.
 16 Q. Okay. And so you have the original and
 17 forth between Light Ventures and you, right?
 18 A. No. I have a screenshot of only that.
 19 Q. Okay. If I asked you -- you're
 20 forwarding something to your attorney, calling him
 21 Brian?
 22 A. No. No. That was to Brian Weiner.
 23 Q. Right. But you sent this to your
 24 attorney Jay Parmelee.
 25 To me it looks like you manipulated the

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1 email here. And we don't know what we're looking
 2 at.
 3 A. Yeah.
 4 Q. You had sent the email to your attorney.
 5 You're saying "Brian," and your attorney's name is
 6 not Brian.
 7 And you've got Light Ventures C without,
 8 you know, a gmail -- inc@gmail.com and no dates on
 9 when you sent any of these emails?
 10 A. Yeah. It was a -- it was screenshot.
 11 But the good news about it is Brian Light has a
 12 LinkedIn, so you can actually contact him very
 13 easily.
 14 And I'm more than -- more than happy to,
 15 you know, have you do that, because he can
 16 authenticate the people that he talked to. You have
 17 an email there of the people that he's spoken to.
 18 And you can ask him "Did you speak with these" --
 19 Q. Now, you've said, I think, in discovery
 20 responses that you spent thousands of dollars on
 21 Plaintiff, right?
 22 Do you remember that?
 23 A. Yeah.
 24 Q. Okay. Do you have receipts for any of
 25 that?

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1 A. She carried all the receipts.
 2 Q. Is answer you don't have receipts; is
 3 that correct?
 4 You have no receipts for anything?
 5 A. The answer is no. Plaintiff has
 6 receipts.
 7 Q. Okay. You're speculating that she has
 8 receipts, right? Because --
 9 A. No. I gave her them. That's not
 10 speculation.
 11 Q. So you're saying you had receipts and
 12 you gave her all the receipts?
 13 A. She carried the receipts.
 14 Q. And you gave her all the receipts via
 15 email -- I'm sorry -- in person, right?
 16 A. In person, yes.
 17 Q. You say in discovery responses that you
 18 gave cash and other gifts worth approximately
 19 \$36,000 to Plaintiff when she visited.
 20 How -- where did you -- you gave her
 21 cash of \$28,000, just handed it to her?
 22 A. Oh, we were walking around with loads of
 23 cash. Yeah.
 24 Q. And you just handed her \$28,000?
 25 A. Yeah. She had stuffed it -- she had

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1 stuffed thousands and thousands in her purse. We
 2 actually went up to casinos together. She had
 3 purchased things, which we don't need to mention
 4 now.
 5 Q. Okay.
 6 A. Out of respect to her.
 7 Q. And you say Brian Light is a witness to
 8 you giving her that.
 9 Is that because -- is that the person
 10 you bought the gem from?
 11 A. Yeah.
 12 Q. And it was a ruby?
 13 A. (No audible response.)
 14 Q. Yeah. Do you remember also saying that,
 15 you know, you got her gifts of jewelry of gold,
 16 pearls, rubies?
 17 Do you remember that?
 18 A. Yeah.
 19 Q. Okay. We'll mark this as Exhibit 20.
 20 Sorry. Let's mark that with it (indicating). And
 21 finally that (indicating).
 22 THE REPORTER: You want all three pages
 23 marked as --
 24 MR. WITTENBERG: Yeah, all three pages.
 25 Thank you.

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1 (Whereupon the document referred
2 to was marked Plaintiff's
3 Exhibit 20 by the Certified
4 Shorthand Reporter and is attached
5 hereto.)
6 BY MR. WITTENBERG:
7 Q. So these are photos of jewelry.
8 And do you recognize any of this
9 jewelry?
10 A. I recognize this ring here (indicating).
11 You can't tell what the pearls are. I have really
12 no idea.
13 This little thing here was a trinket. I
14 remember this one was an arm band that she bought.
15 Q. So you do recognize this jewelry?
16 This is the jewelry you're referring to
17 in your discovery responses, right?
18 A. Some. Not a bunch. Like, for instance,
19 this one (indicating), I don't recognize it.
20 Q. Okay.
21 A. I don't recognize this one here
22 (indicating). I don't recognize this one here
23 (indicating). I don't recognize this (indicating).
24 I don't recognize this (indicating).
25 Q. We don't know what you're pointing at.

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1 A. Okay.
2 Q. So I think that the thing is that some
3 of that looks familiar to you that you recognize and
4 some of it doesn't? Is that what you're getting at?
5 A. Yeah. Absolutely.
6 Q. And with respect to that, this is some
7 of the jewelry that you list being the gold, pearls,
8 rubies; is that right?
9 A. No. There's --
10 Q. None of them?
11 A. This was something that was
12 reconstituted at Jean-Pierre Jewelers on Ventura
13 Boulevard at Canoga Avenue.
14 Q. So this is what you're saying was
15 bought?
16 A. No. That one was mine I gave her as a
17 gift. It was refitted -- it was an 18th century
18 ring, and it was refitted to fit her finger, because
19 she wanted to get married, and she described it as
20 a -- as an engagement ring.
21 Q. Is that what you bought from Brian
22 Light?
23 A. No.
24 Q. No?
25 None of these are what you bought from

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1 Brian Light?
2 A. No.
3 Q. So you only recognize -- what else do
4 you recognize besides that ring that you gave her as
5 a gift that you owned --
6 You didn't buy this ring, you're saying?
7 You owned it?
8 A. Okay. Mr. Wittenberg, I don't -- this
9 is not clear enough to see what is -- there is no
10 loose stones. I know that she had loose stones.
11 They are not shown here.
12 I recognize absolutely this ring right
13 here (indicating).
14 Q. And that's the only thing?
15 A. Yeah. I don't recognize --
16 Q. And that ring is the red ruby-ish ring
17 with a gold band?
18 A. Yeah.
19 Q. And you're saying you owned that in your
20 own possession. You did not buy it?
21 A. Yeah.
22 Q. Yes, you didn't buy it?
23 A. I didn't buy it, no.
24 Q. You just had it --
25 A. That was a gift to her.

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1 Q. That you had in your possession before?
2 A. Yeah.
3 Q. Okay. Let's talk about Linda Barrett
4 for a minute.
5 Do you know what email addresses Linda
6 Barrett uses?
7 A. Chiamenu, C-h-i-a-m-e-n-u.
8 Q. At?
9 A. Sbcglobal.net.
10 Q. Okay. Any other email address?
11 A. None that I know of.
12 Q. Now, do you know -- did Ms. Barrett ever
13 tell you that she emailed Plaintiff?
14 A. Yeah.
15 Q. What did she tell you she said to
16 Plaintiff?
17 A. She was furious and she was trying to
18 ferret her out by saying things that would make
19 her -- make Isabella feel like she had a comrade.
20 She wanted to get to the bottom of it. She was
21 insanely jealous.
22 Q. Do you know if she ever used an email
23 address Angel of Mercy?
24 A. She may have.
25 Q. Do you know her to have ever gone by

409	<p>1 that name Angel of Mercy?</p> <p>2 A. She hasn't gone by that name, but that</p> <p>3 name sounds familiar.</p> <p>4 Q. In relation to Linda Barrett?</p> <p>5 A. In relation to Linda Barrett.</p> <p>6 Q. Why is that?</p> <p>7 A. I seem to recall it. It's a vague</p> <p>8 memory.</p> <p>9 Q. Okay. Were you ever with the Department</p> <p>10 of Defense?</p> <p>11 A. Yeah. That's who I served under with</p> <p>12 the operation that was aborted.</p> <p>13 Q. I'm sorry. What?</p> <p>14 A. That's who I was working with with an</p> <p>15 operation -- in the operation that was ultimately</p> <p>16 aborted June 28, 2011.</p> <p>17 Q. You're referring to the Pentagon?</p> <p>18 A. I'm referring to Pentagon and Department</p> <p>19 of Defense.</p> <p>20 Q. Do you still email with Linda Barrett</p> <p>21 at -- is it chiamenu@sbcglobal.net?</p> <p>22 A. No. There's no real reason to email</p> <p>23 her. She's in the same house.</p> <p>24 Q. But do you know if she still uses the</p> <p>25 same email?</p>	411	<p>1 Linda Barrett's email address?</p> <p>2 A. Yeah, it does. You can also tell that</p> <p>3 she's all over the map.</p> <p>4 Q. So she says here that you're into</p> <p>5 cocaine.</p> <p>6 Do you think she was being dishonest</p> <p>7 when she said that?</p> <p>8 A. I'm not into cocaine. So I would say</p> <p>9 that this was not an honest statement.</p> <p>10 Q. It says that you're suffering from</p> <p>11 edema.</p> <p>12 A. I don't.</p> <p>13 Q. You do not suffer from edema?</p> <p>14 A. No.</p> <p>15 Q. So that's a dishonest statement?</p> <p>16 A. It's --</p> <p>17 Q. It is what?</p> <p>18 A. It's not the truth.</p> <p>19 Q. Okay. She says you're nothing but a</p> <p>20 lying drug addict?</p> <p>21 A. As I said, she admitted to me that she</p> <p>22 was attempting to -- to ferret out Ms. Gauthier.</p> <p>23 But during the three weeks that I spent</p> <p>24 with Ms. Gauthier, I think at most she had a couple</p> <p>25 glasses of wine and we weren't on -- there certainly</p>
410	<p>1 A. Yeah.</p> <p>2 Q. And how do you know that?</p> <p>3 A. She makes no secret. She emailed out</p> <p>4 directions, you know, just the other day. So I know</p> <p>5 that she's using it.</p> <p>6 Q. Okay. Let's just mark this as -- it's</p> <p>7 Exhibit 21.</p> <p>8 (Whereupon the document referred</p> <p>9 to was marked Plaintiff's</p> <p>10 Exhibit 21 by the Certified</p> <p>11 Shorthand Reporter and is attached</p> <p>12 hereto.)</p> <p>13 MR. PARMELEE: Mr. Wittenberg, do you</p> <p>14 have expectation of how much longer you've got?</p> <p>15 MR. WITTENBERG: I think -- I think ten</p> <p>16 minutes. All right?</p> <p>17 What time is it.</p> <p>18 MS. ELLIS: 6:42.</p> <p>19 BY MR. WITTENBERG:</p> <p>20 Q. Do you see at the top here that this is</p> <p>21 an email from Menu For Life?</p> <p>22 A. Yeah.</p> <p>23 Q. Chiamenu@sbcglobal.net to Plaintiff?</p> <p>24 A. Yeah.</p> <p>25 Q. Is that -- to you does that look like</p>	412	<p>1 was no cocaine running around --</p> <p>2 Q. She goes on to say that you need to get</p> <p>3 another place before you leave for your romantic</p> <p>4 vacation. She's had enough of you being -- as a</p> <p>5 liar, enough of this liar.</p> <p>6 Have you ever lied to her Ms. Barrett?</p> <p>7 A. I didn't tell her the truth about</p> <p>8 Isabella.</p> <p>9 Q. Okay. You concealed that information</p> <p>10 from her?</p> <p>11 A. Yes.</p> <p>12 Q. What about anything else? Have you ever</p> <p>13 lied to Ms. Barrett before?</p> <p>14 A. No. No.</p> <p>15 Q. It says that you were spending thousands</p> <p>16 of dollars a day gambling.</p> <p>17 A. That's true.</p> <p>18 Q. You have an email below the day before.</p> <p>19 And who were you writing that to? Do</p> <p>20 you remember?</p> <p>21 A. I didn't write this.</p> <p>22 Q. You don't think you did?</p> <p>23 A. No. She had access to my email at this</p> <p>24 time, and it was very easy for her to go ahead and</p> <p>25 write anything.</p>

413

1 **Mr. Wittenberg, here is what I will tell**
2 **you. Ms. Barrett is now on medication to treat her**
3 **depression. She was in a blind rage here. I don't**
4 **know if she was drunk when she was writing this**
5 **stuff, but it's understandable because, you know,**
6 **she was pretty in love with me and I was not**
7 **forthcoming about --**
8 Q. You were unfaithful to her?
9 **A. We weren't intimate. So you can't be**
10 **unfaithful to someone who you're not intimate with.**
11 **I haven't been with anybody since, you know --**
12 Q. What other -- do you know what other --
13 is Ms. Barrett on any other medication besides -- is
14 she on antidepressants?
15 **A. (No audible response.)**
16 Q. How long has she had this depression?
17 **A. I think since 2011.**
18 Q. Okay. Does she act out violently toward
19 you?
20 **A. Not violently. She has -- she has had**
21 **her issues with -- with anger.**
22 Q. And so she'll just say anything to hurt
23 somebody if she feels like, according to what you're
24 saying this email here that we're looking at, she
25 wrote as Exhibit 21, you're saying filled with lies

414

1 about cheating, correct?
2 **A. Well, yeah.**
3 Q. So she has a propensity to say whatever
4 she wants regardless of the truth? That's how you
5 understand her?
6 **A. No. I would say that if you're**
7 **diagnosed with clinical depression, the synapses in**
8 **your brain do not work properly, and you're liable**
9 **to say just about anything.**
10 **Just to show that she's got a propensity**
11 **for lying, I wouldn't characterize that. But I've**
12 **seen her do many kind things and she has been**
13 **generally very honest.**
14 Q. Okay. If you look down below, what's
15 really happening here -- you say you didn't write
16 the email below, the first email on Exhibit 21.
17 But if you look down, it looks like
18 your -- what she did was forward an exchange of
19 emails that she had with you, and she forwarded
20 those to Plaintiff.
21 Do you see that now when you look down
22 the second page in the email chain?
23 **A. Well, here's what I can tell you. You**
24 **may see an occasional misspelled word in mine. In**
25 **this email here every single sentence has a**

415

1 misspelled word.
2 **Secondly, when Plaintiff first**
3 **contacted -- or first was contacted by Ms. Barrett,**
4 **Ms. Barrett was pretending to be me.**
5 Q. I'm sorry. I didn't catch that.
6 **A. Ms. Barrett was pretending to be me.**
7 Q. When?
8 **A. When Ms. Barrett and the Plaintiff first**
9 **spoke, a text was sent to Ms. Gauthier saying,**
10 **"It's me, please call me. It's**
11 **important."**
12 **And so I didn't send that text. So it**
13 **was Ms. Barrett that was pretending to be me.**
14 Q. Okay.
15 MR. WITTENBERG: All right. Why don't
16 we take a five-minute break or less, use the
17 restroom.
18 I'll just confer with my client and wrap
19 this up.
20 Okay?
21 (Brief recess.)
22 BY MR. WITTENBERG:
23 Q. Okay. This individual you keep
24 referring to as Costa; is that right?
25 **A. Costa, yeah.**

416

1 Q. C-o-s-t-a?
2 **A. Yes.**
3 Q. S at the end or no?
4 **A. No.**
5 Q. Just C-o-s-t-a?
6 **A. Yeah.**
7 Q. Is there a last name?
8 **A. Christodoulou,**
9 **C-h-r-i-s-t-o-d-o-u-l-o-u.**
10 Q. And that's the first name?
11 **A. That's the last name.**
12 Q. That's the last name. The first name is
13 Costa?
14 **A. Yeah.**
15 Q. Is this a partner of yours?
16 **A. This was a person who was a collaborator**
17 **musically with me.**
18 Q. Is this a person that was ever your
19 business partner?
20 **A. I wouldn't say business partner. We --**
21 **well, we -- I had been a composer for a long time.**
22 **I was looking for an arranger. He fit the bill. He**
23 **was a composer on his own.**
24 But what ended up happening is he had
25 sophisticated equipment where I could take my

417	<p>1 melodies, and he could add percussion and other 2 production elements. 3 So did we ever have a formal L.L.C.? 4 No, we did not. 5 He lives in Greece and -- 6 Q. So you was a collaborator of music, you 7 described? 8 A. Yes. 9 Q. And he lives in Greece now? 10 A. Yeah. Well, he did live in Greece. 11 Q. Do you have his email address? 12 A. No, I don't. That's -- 13 Q. Do you have his telephone number? 14 A. No, I don't. 15 Q. You have no way to get in touch with 16 him? 17 A. No. Looked everywhere. 18 Q. Do you communicate with him on Facebook? 19 A. Not -- not since May. 20 Q. Do you communicate with him on YouTube? 21 A. I do not communicate with him on any 22 social media. I don't communicate with him, period. 23 Q. The license -- driver's license you gave 24 us at the beginning of the day shows that it's 25 expired.</p>	419	<p>1 test." 2 So ten days ago I had the written test. 3 I passed. And as a matter of just getting the 4 okay -- 5 Q. How long ago did this event occur that 6 your license was taken from you -- 7 Is it correct to say it was suspended? 8 A. Yeah. It was suspended. 9 Q. So it was suspended by the D.M.V.? 10 A. Last January. 11 Q. And it's because you got into a car 12 crash? 13 A. I got into a car crash, yeah. 14 Q. Were you intoxicated? 15 A. No. 16 Q. Was there a police record of the car 17 crash? 18 A. There was, but there was no 19 intoxication. They -- 20 Q. How many car crashes have you been in in 21 the last two years? 22 A. Last two years? Maybe three. You know, 23 in the last two -- two years, maybe three or four, 24 you know. The problem -- 25 Q. Were you ever prosecuted for driving</p>
418	<p>1 A. Yeah. 2 Q. And it expired in 2011? 3 A. Yeah. 4 Q. Do you have a current driver's license? 5 A. I have a license, but I didn't -- didn't 6 bring it. 7 Q. Do you have a current driver's license? 8 A. Do I have a -- no. I don't have a 9 current one, but I'm going to get one within a 10 couple weeks. 11 Q. Okay. You just said that you have a 12 license but you didn't bring it. 13 A. Yeah. 14 Q. What do you mean by that? 15 A. I have a -- a more current one. 16 Q. So you are licensed to drive as we sit 17 here right now? 18 A. Right now, no, I'm not licensed to 19 drive. I have to get through a medical examination, 20 because I had a crash due to -- I have this 21 diverticulitis that I was telling you about. So the 22 doctor who prescribed me the run of antibiotics on 23 July 30th, because I had a crash, the D.M.V. has 24 said, "You need to go through a physical and you 25 need to go through a written test and a driving</p>	420	<p>1 under the influence of drugs or alcohol? 2 A. I was prosecuted in -- for an event that 3 happened in 2012 where actually I wasn't in the 4 vehicle, but I was on anti-anxiety medicine. And 5 because I admitted this to the police officer, he 6 did a cite and release. 7 So he took me to a hospital -- 8 Q. Was this prescription medication? 9 A. Yeah. 10 Q. And what was the name of it? 11 A. Pyrazolone, I guess it is. 12 Q. And you were driving under the influence 13 of that? 14 A. I was not driving. The car was parked. 15 I was waiting for a ride to pick me up. 16 This was in August of 2012, and this was 17 when I had further -- further death threats from 18 Mr. Steve Leflar. 19 At the same time during the same period 20 he had now assumed my son's identity online and had 21 assumed the identity of the woman who we will call 22 Julie. So this was a virulent stalker. 23 Q. Did the police ever arrest him for 24 stalking you? 25 A. I tried. I went --</p>

421

1 Q. So the answer is no, correct?

2 **A. They couldn't find him.**

3 Q. Okay. You reported him to the police?

4 **A. Numerous times.**

5 Q. And the police never took action to

6 arrest him, correct?

7 **A. I went to the Napa Police on December 5,**

8 **2012 with my son and with his wife. They wouldn't**

9 **even take a report.**

10 Q. With your son's wife?

11 **A. With my son and his mother. Sorry.**

12 Q. Okay.

13 **A. They would not even take a report. I**

14 **went to --**

15 Q. Then you were prosecuted for stalking?

16 **A. Yes.**

17 Q. And you were -- well, how did you

18 describe it? For DUI?

19 You were -- you had your license

20 suspended because you were under the influence of

21 drugs?

22 **A. I had -- I suspect restricted -- it was**

23 **a restricted license.**

24 Q. Because you were under the influence of

25 drugs while driving?

422

1 **A. They didn't pull my car over. My car**

2 **was parked. And I was waiting for a ride.**

3 **But because a lady had wanted the car**

4 **parking space, she had started to raise a fuss.**

5 **When I said I'm not going anywhere and I'm waiting**

6 **for a ride and it was free to park here, that's**

7 **where the person next to her was a Highway Patrol**

8 **guy from another state or he was a sheriff from**

9 **another state.**

10 **My attorney, the same one who**

11 **represented me up in Napa -- how can I put this? He**

12 **didn't defend me very well.**

13 Q. So you -- in your mind, you were

14 wrongfully prosecuted, right?

15 **A. On this one? Oh, in Napa? Well, yes.**

16 Q. Were you ever not wrongfully prosecuted,

17 Mr. Schoenberger?

18 **A. Oh, I -- I think I was absolutely**

19 **wrongfully prosecuted. In fact --**

20 Q. Every time you were prosecuted, three

21 times, correct?

22 **A. Well, twice.**

23 Q. There were three cases other than --

24 **A. I don't -- I don't consider the Sonoma**

25 **one a non-prosecution.**

423

1 Q. Okay. So you consider yourself

2 prosecuted twice, correct?

3 **A. Prosecuted by Napa twice, yes, sir.**

4 Q. And both times it was wrongful

5 prosecution, is that what you said?

6 **A. Yes.**

7 Q. Okay. And each time you're innocent,

8 correct?

9 **A. Yes.**

10 Q. And you lost your license even though

11 you shouldn't have, right?

12 **A. No. I had a restricted license.**

13 Q. It was restricted, but it shouldn't have

14 been. It was a mistake by the police officer?

15 **A. No. No.**

16 Q. What are you saying?

17 **A. I'm saying that if anything, it was**

18 **probably a good call by the police officer.**

19 **I may not have physically been behind**

20 **the wheel, but I'm pretty all for, you know, people**

21 **shouldn't be taking pretty much any medications, but**

22 **even more than that, they shouldn't be texting, she**

23 **they shouldn't be using --**

24 Q. Is that a strong medication?

25 **A. It can be. It depends upon how big you**

424

1 **are and how you handle it.**

2 Q. Okay. And how long were you on this

3 medication?

4 **A. Oh, God. Maybe a year and a half to two**

5 **years.**

6 Q. And so this was what period of time?

7 2014, 2015 or 2013?

8 **A. No.**

9 Q. What was the period?

10 **A. It would have been 2010 to 2012. Right**

11 **after my father had died and after the stalking had**

12 **gone through the roof.**

13 Q. Okay. Going to your tax returns, you

14 have a discovery response, it says you had not --

15 and this is back in October. So, I guess just about

16 a month ago. You said you hadn't filed your 2014

17 tax returns yet?

18 **A. No.**

19 Q. Okay. Do you intend to file your 2014

20 tax returns?

21 **A. Yes. But I'd like a conclusion to what**

22 **we're doing here, because there is -- and I've**

23 **talked to both a tax professional and I've called**

24 **the I.R.S. saying what do I do on this? And they**

25 **said, well, you really don't -- a court of law**

425

1 hasn't determined whether it's a contract or a gift.
 2 So you're going to pay a late fee no matter what.
 3 We don't any take any prisoners, but --
 4 Q. So what you're trying to tell me is that
 5 you -- your position is that the roughly \$400,000
 6 Plaintiff transferred you was a gift?
 7 A. Yes.
 8 Q. And you -- but you don't want to declare
 9 it as income on your -- on your tax return, right?
 10 A. No. The I.R.S. professional that I
 11 spoke to said you really can't file until there is a
 12 legal outcome with this. Because how -- you know --
 13 nice guy. He basically said --
 14 Q. What's his name?
 15 A. Oh, I have it written down somewhere.
 16 It was, you know, an I.R.S. agent.
 17 Q. Okay.
 18 A. Okay. So --
 19 Q. What's the tax attorney you spoke with?
 20 What's his name?
 21 A. I can look it up. I've got pages of it.
 22 I was calling attorneys all over the place, not only
 23 for this thing, but also because I filed an appeal
 24 with what happened up in Napa and I filed an appeal
 25 based upon ineffectual counsel by my attorney up

426

1 there.
 2 And he later admitted it to Beverly
 3 Saxon Leonard. This is the lady who I had mentioned
 4 earlier.
 5 Q. Okay. So the -- you're telling me you
 6 have no intention of filing a 2014 tax return?
 7 A. No. I absolutely will.
 8 Q. Let me finish, please.
 9 A. Okay.
 10 Q. You have no intention of filing a 2014
 11 tax return until after this case is concluded; is
 12 that right?
 13 A. I have -- yes.
 14 Q. Okay.
 15 A. Yeah.
 16 Q. Is the question in your mind whether you
 17 file it as income, whether you file on your tax
 18 returns that the 400 roughly thousand dollars that
 19 you were given from Plaintiff -- whether to put it
 20 down as income? Or what's the question?
 21 A. I'm not a tax specialist. So --
 22 Q. What were you advised? Why not just put
 23 down the way you want to treat it and file?
 24 A. Because if you put it down as income,
 25 and let's say you owe that amount and let's say on a

427

1 slim chance you get a judgment here, then not only
 2 am I getting a default against me, I've already paid
 3 taxes on --
 4 Q. Is it -- is it your understanding that
 5 you have to pay taxes for income on the money that
 6 you're calling a gift that Plaintiff gave you?
 7 A. I do not know enough about tax law. And
 8 the person who I was on the phone with I spent three
 9 or four minutes with.
 10 The I.R.S. is understaff. I must have
 11 called them ten times before I got someone to pick
 12 up the phone.
 13 Q. And you had no other income other than
 14 the money that you were given by Plaintiff in 2014?
 15 A. Yeah.
 16 Q. No income from any other source?
 17 A. Other than the selling of assets, no.
 18 Q. Okay. But all the assets are gone, you
 19 said?
 20 A. I still have some paintings.
 21 Q. Does Ms. Barrett pay for your living
 22 expenses now?
 23 A. Does she? She has lately. Because
 24 things have been tough.
 25 But once this project hits fruition, the

428

1 project that I'm working on --
 2 Q. And which one are you working on?
 3 A. I'm working on a television development
 4 deal.
 5 Q. With who?
 6 A. Well, we're shopping it, but with
 7 Michael Levine.
 8 Q. Okay. What does Ms. Barrett do for a
 9 living?
 10 A. Ms. Barrett has had a company where
 11 she's baked breads. She sells Chia seeds, which is
 12 an ancient grain.
 13 Q. She does that now?
 14 A. Yeah. She still has it. She's also
 15 provided hospice or elder care.
 16 Q. Did you ever have an agent --
 17 A. Yeah.
 18 Q. -- that represented you?
 19 A. (No audible response.)
 20 Q. And what was that person's name?
 21 A. Robert Miller.
 22 Q. And when was the last time you spoke
 23 with Robert Miller?
 24 A. Six months ago.
 25 Q. Does he still represent you as an agent?

429	<p>1 A. No. No.</p> <p>2 Q. Why not?</p> <p>3 A. Because I'm moving into an area of music</p> <p>4 that he is not familiar with. He represented me</p> <p>5 intensively when my CD started to go viral.</p> <p>6 People no longer listen to CD's.</p> <p>7 There's no need to place them physically into</p> <p>8 stores. So that market has come and gone.</p> <p>9 Q. Did you have a written agreement with</p> <p>10 Mr. Miller to -- when he was working as your agent?</p> <p>11 A. I did. We had a -- this is what we were</p> <p>12 trying to get to you, but I couldn't get ahold of</p> <p>13 him.</p> <p>14 We had a licensing agreement out of</p> <p>15 Japan for their resale of my CD's. Also there's a</p> <p>16 pet company that is -- for a while we had a product</p> <p>17 called -- stupid name, and I didn't name it, Doggone</p> <p>18 Songs.</p> <p>19 So what had happened is that guide dogs</p> <p>20 for the blind has tested my music and -- in the</p> <p>21 kennels, and they thought somehow it made dogs calm.</p> <p>22 I wasn't convinced of the science. I</p> <p>23 thought it was hucksterism. But CD's were sold and</p> <p>24 we were able to get a license there. And that was a</p> <p>25 signed agreement.</p>	431	<p>1 Q. Okay. And your current business being</p> <p>2 Sophia Musik, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And does it have any customers?</p> <p>5 A. I'm right now shopping a -- a</p> <p>6 television --</p> <p>7 Q. Just yes or no? Does it have any</p> <p>8 customers?</p> <p>9 A. It's potential customers.</p> <p>10 Q. What do you sell on Sophia Musik?</p> <p>11 A. We'll be selling episodes of TV, five</p> <p>12 seasons, 12 episodes per season with a rough budget</p> <p>13 of \$5 million per episode.</p> <p>14 Q. Okay. And what's your stake in that,</p> <p>15 your financial stake?</p> <p>16 A. My time?</p> <p>17 Q. No?</p> <p>18 A. My financial --</p> <p>19 Q. Do you have ownership? Is there a piece</p> <p>20 of paper, a stock certificate? Is there anything</p> <p>21 that shows you as an owner of this project?</p> <p>22 A. We're drawing up papers within two weeks</p> <p>23 through Mr. Levine's attorney. And what it will be</p> <p>24 is we have Richard Letch as part of it, so there's</p> <p>25 three people. So it's a triumvirate. And my stake</p>
430	<p>1 Q. Okay. Do you have a written agreement</p> <p>2 with your agent wherein he's going to represent you</p> <p>3 as an agent?</p> <p>4 A. He -- it wasn't an agent as in for live</p> <p>5 performance.</p> <p>6 I think that you're thinking of an agent</p> <p>7 that would represent an actor or a musician.</p> <p>8 What we did is that we had licensing</p> <p>9 agreements that we all signed. So we had an</p> <p>10 agreement for -- under Intelibaby where we sold CD's</p> <p>11 in, you know, at least 20 countries.</p> <p>12 And this is where I got a lot of the</p> <p>13 awards from Dr. Toy that you saw --</p> <p>14 Q. Just in sum, the money that Plaintiff</p> <p>15 transferred you is all gone, correct?</p> <p>16 A. (No audible response.)</p> <p>17 Q. There is no business that you bought</p> <p>18 into with Plaintiff's money, correct?</p> <p>19 A. There is no business that I --</p> <p>20 Q. Bought into as an investor with</p> <p>21 Plaintiff's money, correct?</p> <p>22 A. I'm composing --</p> <p>23 Q. Just did you use her money to buy in a</p> <p>24 business? Yes or no?</p> <p>25 A. No. I used it to expand mine.</p>	432	<p>1 will be 40 percent.</p> <p>2 So the main goal is to be an executive</p> <p>3 producer and also a story-telling producer.</p> <p>4 Q. And what's going to be the name of this</p> <p>5 ultimate show, TV show?</p> <p>6 A. Well, what else can it be? It is 3301.</p> <p>7 That's the working title. But until you find a</p> <p>8 network or a cable, they decide the name.</p> <p>9 They might come back and decide</p> <p>10 something different. And then you start to get paid</p> <p>11 as soon as you go into preproduction. But the money</p> <p>12 can be significant.</p> <p>13 Q. Do you intend to give Plaintiff back her</p> <p>14 money at any point in time?</p> <p>15 A. It was a gift. When this show --</p> <p>16 Q. Is that a no? You have no intention to</p> <p>17 give her back any money?</p> <p>18 A. I need to finish my statement. It's</p> <p>19 important.</p> <p>20 Q. Again, if you start with a "yes" or</p> <p>21 "no," you can do but, you can change your mind after</p> <p>22 the fact. But I get lost in your long stories.</p> <p>23 A. This will be three --</p> <p>24 Q. Do you intend to give Plaintiff her</p> <p>25 money back in the future or not?</p>

THOMAS SCHOENBERGER



December 1, 2015

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433	<p>1 A. This will be three sentences, if you can</p> <p>2 bear with me.</p> <p>3 If I get this show going, I'd be more</p> <p>4 than happy to gift her \$400,000 plus. Plus.</p> <p>5 MR. WITTENBERG: Okay. I have no</p> <p>6 further questions.</p> <p>7 THE WITNESS: Okay.</p> <p>8 MR. PARMELEE: No questions.</p> <p>9 MR. WITTENBERG: We can go off the</p> <p>10 record.</p> <p>11 (Off-the-record discussion.)</p> <p>12 MR. PARMELEE: We'll stipulate that the</p> <p>13 transcript rather than being returned to the court</p> <p>14 reporter will be sent to the Law Offices of Heywood</p> <p>15 Friedman.</p> <p>16 Mr. Schoenberger will have 30 days to</p> <p>17 make any edits, changes or corrections he believes</p> <p>18 necessary; and Mr. Friedman's office will produce</p> <p>19 the original transcript should it be called upon for</p> <p>20 any reason; if it is lost, destroyed, misplaced,</p> <p>21 then a certified copy will be just as good as the</p> <p>22 original.</p> <p>23 Is that acceptable?</p> <p>24 MR. WITTENBERG: That's acceptable.</p> <p>25 Thank you.</p>	435	<p>1 I, THOMAS SCHOENBERGER, say I have read</p> <p>2 the foregoing deposition and declare under penalty of</p> <p>3 perjury under the laws of the State of California:</p> <p>4 That the foregoing is my deposition under</p> <p>5 oath;</p> <p>6 That I have read same and have made the</p> <p>7 necessary corrections, additions or changes to my</p> <p>8 answers that I deem necessary;</p> <p>9 That my answers as indicated are true and</p> <p>10 correct.</p> <p>11</p> <p>12 Executed at _____,</p> <p>13 California, this _____ day of _____,</p> <p>14 20____.</p> <p>15</p> <p>16 _____</p> <p>17 THOMAS SCHOENBERGER</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
434	<p>1 (Whereupon at 7:12 P.M. the</p> <p>2 deposition proceedings were</p> <p>3 concluded.)</p> <p>4 * * *</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	436	<p>1 REPORTER'S CERTIFICATE</p> <p>2</p> <p>3 I, PATRICIA L. HUBBARD, do hereby certify:</p> <p>4</p> <p>5 That I am a duly qualified Certified</p> <p>6 Shorthand Reporter in and for the State of California,</p> <p>7 holder of Certificate Number 3400, which is in full</p> <p>8 force and effect, and that I am authorized to</p> <p>9 administer oaths and affirmations;</p> <p>10</p> <p>11 That the foregoing deposition testimony of</p> <p>12 the herein named witness, to wit, THOMAS SCHOENBERGER,</p> <p>13 was taken before me at the time and place herein set</p> <p>14 forth;</p> <p>15</p> <p>16 That prior to being examined, THOMAS</p> <p>17 SCHOENBERGER was duly sworn or affirmed by me to</p> <p>18 testify the truth, the whole truth, and nothing but</p> <p>19 the truth;</p> <p>20</p> <p>21 That the testimony of the witness and all</p> <p>22 objections made at the time of examination were</p> <p>23 recorded stenographically by me and were thereafter</p> <p>24 transcribed by me or under my direction and</p> <p>25 supervision;</p>

THOMAS SCHOENBERGER
December 1, 2015

437

1 That the foregoing pages contain a full,
2 true and accurate record of the proceedings and
3 testimony to the best of my skill and ability;
4
5 I further certify that I am not a relative
6 or employee or attorney or counsel of any of the
7 parties, nor am I a relative or employee of such
8 attorney or counsel, nor am I financially interested
9 in the outcome of this action.
10
11 IN WITNESS WHEREOF, I have subscribed my
12 name this 14th day of December, 2015.
13
14 
15 PATRICIA L. HUBBARD, CSE 
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438

1 ERRATA SHEET FOR THE TRANSCRIPT OF:
2 Case Name: GAUTHIER vs SCHOENBERGER
3 Dep. Date: DECEMBER 1, 2015
4 Deponent: THOMAS SCHOENBERGER
5 Page Line Now Reads Should Read Reason
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24 _____
25 Signature of Deponent Date

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