

Deposition of ANGRY GAY POPE ANONORANGE v. CHURCH OF SCIENTOLOGY

Taken on
September 17, 2010

APPEARANCES OF COUNSEL:

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This video was transcribed by volunteers of the Angry Gay Pope. The names of some protesters have been replaced with their Anonymous code names. Ordinarily such transcripts are provided by the court reporter as a courtesy to the deposed person's lawyer. In this case the hired transcriptionist was [Hutchings Court Reporters](#). Unfortunately cult lawyer Kendrick Moxon did not allow this and, as mentioned, the document you are about to read was transcribed by volunteers.

Also Present: Barbara Westmore, Videographer
Floyd Patterson - Scientologist whose real name is Phillippe Pedersen yet he continues to lie in deposition videos about his name. He says he is Floyd Patterson on video then later he goes to the transcript and changes his name. This transcript of the video strives for accuracy. The video of the incident is literal. They both agree (except for the nicknames "Angry Gay Pope" and "Anonorange"). What will not agree is the Hutchings version of this transcript. This will no doubt identify him by the name his boss Kendrick Moxon calls him: **Philippe Pedersen**. I have not read the Hutchings version of this deposition because it would require me to go to their offices on the other side of LA and read it without taking a copy. In other words, cult lawyer Kendrick Moxon is using legal harassment to prevent me from commenting on my own deposition transcript.

The portion of the transcript between 10:45:11 A.M. and 10:46:23 A.M. is to remain confidential.

Questions the witness refuses to answer are indicated in the transcript by a "[QUES]" identifier at the end of the question and are located at the following times:

10:32:03
10:35:19
10:35:46
10:36:07
10:36:43
10:36:54
10:37:27
10:38:13
10:38:40
11:23:10

Words not clearly heard or understood are labeled "[INAUDIBLE]". It was not always possible to identify off-camera speakers:

10:28:52 [WOMAN'S VOICE]: Please raise your right hand. Do you solemnly state, under penalty of perjury, that the testimony you will give in the cause now pending will be the truth, the whole truth, and nothing but the truth?

10:29:01 [WOMAN'S VOICE]: Thank you.

10:31:27 [MAN'S VOICE]: It's up.

10:31:38 [MAN'S VOICE]: [INAUDIBLE]

10:34:00 [WOMAN'S VOICE]: [INAUDIBLE]

11:07:00 [MAN'S VOICE]: We off the record?

11:54:01 MAN'S VOICE: [whispering] [INAUDIBLE]

11:54:03 MAN'S VOICE: [whispering] Yeah. Yeah.

11:54:25 MAN'S VOICE: [INAUDIBLE]

11:54:33 MAN'S VOICE: Please.

11:54:34 MAN'S VOICE: [whispering] Sorry.

10:27:46 AGP: -- a --

10:27:46 THE VIDEOGRAPHER: -- for five minutes --

10:27:46 MR. MOXON: No scre-- No screaming.

10:27:51 THE VIDEOGRAPHER: Good morning. We are on the record. My name is Barbara Westmore. I'm a video technician with Hutchings Management Corporation, located at 6055 East Washington Boulevard in Los Angeles, California.

This is the videotaped deposition OF Angry Gay Pope, beginning at 10:28 A.M. on [INAUDIBLE] [September] 17th, 2010, in the matter of AnonOrange versus the Church of Scientology, Case Number RIC 538634, taken at 1325 Spruce Street in Riverside, California.

May we have introductions beginning with counsel, please.

10:28:29 MR. BERRY: Graham Berry, appearing for the witness. We're not on any indirect feed, are we? Outside feed?

10:28:37 MR. BERRY: Okay.

10:28:39 MR. MOXON: Kendrick Moxon for defendants.

10:28:41 MR. CANTRELL: David Cantrell for the defendants.

10:28:45 MR. PATTERSON: Floyd --

10:28:45 [WOMAN'S VOICE]: [INAUDIBLE]

10:28:47 MR. PATTERSON: Floyd Patterson, Church of Scientology International.

10:28:52 [WOMAN'S VOICE]: Please raise your right hand. Do you solemnly state, under penalty of perjury, that the testimony you will give in the cause now pending will be the truth, the whole truth, and nothing but the truth?

10:29:00 AGP: Yes.

10:29:01 [WOMAN'S VOICE]: Thank you.

10:29:07 MR. MOXON: Angry Gay Pope, I'm give you a few general admonitions, so we understand the, uh, the rules of the -- of the game here.

10:29:16 AGP: Like the last time, yeah.

10:29:20 MR. MOXON: No, it's -- not exactly. First of all, you're under oath. You understand what that means?

10:29:27 AGP: Yes, I'm telling the truth.

10:29:29 MR. MOXON: And you understand it's a -- it could be a criminal penalty for you to not tell the truth?

10:29:34 AGP: Yes.

10:29:35 MR. MOXON: That you could be prosecuted --

10:29:34 AGP: I completely understand that. Yes.

10:29:37 MR. MOXON: All right. [clears his throat] If I, uh, ask a question that you don't fully understand, you have me clarify it for you before you answer, all right?

10:29:46 AGP: Right

10:29:46 MR. MOXON: We'll assume that you understand every question that I ask you.

10:29:49 AGP: Unless I say otherwise, yes.

10:29:51 MR. MOXON: Okay. Good enough. We'll proceed.

10:29:56 AGP: Great.

10:30:00 MR. MOXON: Are you under the influence of any drugs or medication?

10:30:04 MR. BERRY: Objection to the form of the question. You may ask him if he's taken anything that may affect his ability to recall or testify truthfully, during the last twenty-four hours.

10:30:15 MR. MOXON: Are you under the influence of any drugs or medication?

10:30:20 AGP: Uh --

10:30:21 MR. BERRY: Objection, umm, to the form of the question. You had asked the standard admonition and related question as to whether he is, uh, able to testify truthfully and recall accurately.

10:30:35 MR. MOXON: Mr. Berry, the, uh, [exhales] I don't want to spend all day arguing with you over objections. If you -- If you wish to make an objection for the record, make the objection. Uh, speaking objection or telling me how I should ask the question is inappropriate. If you -- So you can make an objection, you can instruct the witness if it's a matter of, uh, privilege, otherwise, uh, I'll ask the questions the way I see fit. If you wish to make an objection, make the o-- objection, but, please don't coach the witness or -- or make speeches or -- or tell me how the question should be reframed.

My question to you, Angry Gay Pope, is: Are you under the influence of any drugs or medication?

10:31:16 MR. BERRY: Objection. Privacy and speculation.

10:31:22 AGP: Wa-- you want to know about every drug I take. You want me to tell you every drug that I take.

10:31:25 MR. BERRY: Objection.

10:31:27 [MAN'S VOICE]: It's up.

10:31:32 MR. BERRY: There's an objection pending. Do you want to rephrase the question?

10:31:38 [MAN'S VOICE]: [INAUDIBLE]

10:31:39 MR. MOXON: Yeah. No. I want you to tell me if you are under the influence of any --

10:31:45 AGP: What --

10:31:45 MR. MOXON: -- any drugs or medication. Yes, tell me what drugs you are taking.

10:31:47 MR. BERRY: Calls for speculation. [INAUDIBLE]

10:31:48 MR. MOXON: All right. Well, tell me what drugs you are taking that are--

10:31:50 MR. BERRY: Objection. Privacy. Irrelevant.

10:31:54 MR. MOXON: Answer.

10:31:56 AGP: W-- you mean, like my blood pressure medication?

10:31:59 MR. MOXON: Okay, --

10:32:00 AGP: Uh-huh.

10:33:00 MR. MOXON: that's--

10:32:00 MR. BERRY: Objection.

10:32:01 AGP: Huh, huh.

10:32:01 MR. BERRY: Privacy.

10:32:01 MR. MOXON: That's a good start

10:32:01 MR. BERRY: Instruct the witness not to answer.

10:32:03 MR. MOXON: Are you-- [QUES]

10:32:04 AGP: I'm not gonna answer. That's a private medical question between me and my doctor. If -- If --

10:32:10 MR. MOXON: Well, many drugs have effects on the mind. In fact, practically every drug does. And, uh, combinations of drugs have effects. I want to make sure I have the best testimony. I'm just providing you this information so that -- so there'll be no -- no question about it when I come back and make another motion to compel. You've already been ordered to --

10:32:29 AGP: Mm-hmm.

10:32:29 MR. MOXON: -- appear for this deposition. One of the reasons why you said you couldn't pay is because you're taking s-- You know, you have to pay so much for medications -- for some alleged condition. So I want to make sure, Mr. Berry, that I have the best testimony of this witness. If he's -- If he's got some kind of condition that could even arguably affect his ability to testify, we need to know what it is.

10:32:55 AGP: Uh, well, those--

10:32:56 MR. BERRY: Ob-- Objection.

10:32:57 MR. MOXON: So--

10:32:57 MR. BERRY: Privacy.

10:32:58 MR. MOXON: I haven't asked a question. I'm just -- I'm just trying to, uh, have some influence, Mr. Berry, upon you so I don't have to come back here again and file another motion to compel.

10:33:10 MR. BERRY: But there has been no previous motion to compel his -- his que-- his responses.

10:33:15 MR. MOXON: No, he was ordered to come back and answer our questions.

10:33:18 MR. BERRY: Yes, and he's -- he's asserting his privacy rights. You may ask him if he's under the influence of any medication which may affect his ability to recall or testify truthfully. You are not entitled to his medical history as a independent third-party witness on matters unrelated to this litigation. He's not giving --

10:33:39 MR. MOXON: So --

10:33:39 MR. BERRY: -- up his rights to privacy, absent a court order. So -- you can keep talking around in circles, but that's the position. Ask an acceptable question, he'll give you the answer. But ask him about the details of his medical history and he's asserting privacy until the court orders otherwise.

10:34:00 [WOMAN'S VOICE]: [INAUDIBLE]

10:34:02 MR. MOXON: You are taking blood pressure medication?

10:34:05 MR. BERRY: Objection. Privacy. Instruct the witness not to answer.

10:34:09 MR. MOXON: Well, he already said he was, Mr. Berry. You're asserting privacy for something he already answered?

10:34:17 MR. BERRY: He's said enough on that issue without -- He's -- He did not --

10:34:20 MR. MOXON: What --

10:34:20 MR. BERRY: -- intend to, uh, waive the privilege --

10:34:23 MR. MOXON: What --

10:34:23 MR. BERRY: -- and waive the protection. Now, if you wish to proceed further down this, uh, down this path, we'll just leave. This -- This is obviously going nowhere. You're obviously not conducting this in good faith. We know you have a drug -- anti-drug agenda. This is not the place to --

10:34:40 MR. MOXON: Mr. --

10:34:40 MR. BERRY: to -- to bring it out.

10:34:46 MR. MOXON: All right. All right. Are you instructing him not to answer what blood pressure medication he's on? That's all I want to know.

10:34:55 MR. BERRY: Is that your one question in this area?

10:34:57 MR. MOXON: No! Will you please conduct this deposition in a proper manner, Mr. Berry? The --

10:35:02 MR. BERRY: The que--

10:35:03 MR. MOXON: -- question -- I ask a question -- This is how it works: I ask a question, you make an objection, you give an instruction if you wish, and we go on to the next question. That's the only way it works.

10:35:12 MR. BERRY: As -- As he's instructed not to answer on the grounds of medical privacy.

10:35:15 MR. MOXON: Okay. Are you following that instruction?

10:35:17 AGP: Yes.

10:35:19 MR. MOXON: Uh, other than the blood pressure medication, are you taking any other medication presently? [QUES]

10:35:23 AGP: I'm not gonna answer.

10:35:26 MR. MOXON: [INAUDIBLE]

10:35:28 MR. BERRY: I instruct him not to answer on the grounds of privacy. I've told you the question which he will answer, which from all my years of experience with you is generally the one you generally ask the witness.

10:35:37 MR. MOXON: Mr. Berry, just fine. I don't need any more --

10:35:39 MR. BERRY: This is --

10:35:39 MR. MOXON: -- speeches. No more speeches.

10:35:46 MR. MOXON: [to Angry Gay Pope] Are you under the effect of any medication which has any effect of any kind upon the mind? [QUES]

10:35:53 MR. BERRY: Objection

10:35:53 MR. MOXON: On the brain?

10:35:54 MR. BERRY: Objection. Calls for speculation. Vague and tel-- unintelligible and ambiguous. Confusing.

10:36:00 MR. MOXON: Answer it.

10:36:01 MR. BERRY: And calls for expert testimony.

10:36:02 MR. MOXON: Answer.

10:36:04 MR. BERRY: I instruct the witness not to answer.

10:36:06 AGP: I'm not going to answer.

10:36:07 MR. MOXON: Are you under the effect of any psychotropic medications? [QUES]

10:36:13 MR. BERRY: Objection. Calls for speculation. Invades his privacy.

10:36:16 MR. MOXON: Answer.

10:36:17 AGP: I'm not going to answer.

10:36:19 MR. MOXON: You haven't been instructed not to answer.

10:36:23 AGP: These are personal questions and --

10:36:28 MR. MOXON: You refuse to answer?

10:36:28 AGP: -- they're not relevant.

10:36:29 MR. MOXON: You refuse to answer?

10:36:30 AGP: I refuse to answer.

10:36:32 MR. MOXON: Uh, are you on any antidepressants?

10:36:37 AGP: These are all impertinent.

10:36:40 MR. MOXON: Answer.

10:36:41 AGP: I'm not gonna answer.

10:36:43 MR. MOXON: Any anti-psychotics? [QUES]

10:36:45 AGP: I'm not gonna answer.

10:36:48 MR. MOXON: You refuse to answer?

10:36:50 AGP: I refuse to answer.

10:36:54 MR. MOXON: Now, Mr. Berry indicated that you would answer a question relating to whether or not you are under the effect of any medication that affects your ability to think. Do you -- Are you under the effect of any medication that -- that -- that you understand is intended to address thought processes? [QUES]

10:37:14 AGP: I am under no medication that would prevent me from remembering or thinking properly.

10:37:19 MR. MOXON: That's not -- That's not what I asked you.

10:37:21 AGP: That's all I can say.

10:37:23 MR. MOXON: You refuse to answer?

10:37:24 AGP: I refuse to answer anything further.

10:37:27 MR. MOXON: Do you have any prescriptions? Presently have any prescriptions for medications? [QUES]

10:37:32 AGP: I'm not gonna answer that.

10:37:37 MR. MOXON: Then you --

10:37:38 MR. BERRY: [Motions toward Mr. Moxon with right hand to stop]

[to Angry Gay Pope] You can answer that you have prescriptions, but you're not -- you can choose whether or not you give details.

10:37:44 AGP: Mm-hmm. Okay. Like -- Like almost all Americans, yes, I am on prescription drugs.

10:37:50 MR. MOXON: How many?

10:37:57 AGP: Seven. Seven or eight.

10:38:01 MR. MOXON: At the same time?

10:38:04 AGP: Yes.

10:38:06 MR. MOXON: Is it --

10:38:06 AGP: I'm HIV positive alone.

10:38:13 MR. MOXON: Except for drugs that you're taking for, uh, HIV, can you please identify what other drugs you are taking? Excluding any HIV. [QUES]

10:38:26 AGP: No, that's a --

10:38:26 MR. BERRY: Objection.

10:38:26 AGP: -- personal question.

10:38:28 MR. BERRY: Privacy.

10:38:29 AGP: Medical privacy.

10:38:29 MR. BERRY: Instruct the witness not to answer.

10:38:30 AGP: Medical privacy issues you're bringing up here. You know, I thought I was here to talk about, uh, what happened to AnonOrange. François Orange.

10:38:40 MR. MOXON: Were you, uh, taking any drugs -- Well, how -- How long have you -- have you been -- taking prescription medication? [QUES]

10:38:53 AGP: That's a --

10:38:53 MR. BERRY: Objection. Irrelevant.

10:38:55 AGP: Irrelevant.

10:38:55 MR. BERRY: If you're gonna --

10:38:56 MR. MOXON: Have you been --

10:38:56 MR. BERRY: If this is the purpose of your deposition --

10:38:59 MR. MOXON: Mr. Berry ---

10:38:59 MR. BERRY: -- to -- to --

10:39:00 MR. MOXON: No speech is necessary. You can instruct him if you wish.

10:39:02 MR. BERRY: I instruct him not to answer.

10:39:03 MR. MOXON: Okay.

10:39:03 MR. BERRY: I'm just telling you --

10:39:04 MR. MOXON: Since the time --

10:39:04 MR. BERRY: -- that we're about to leave if you're not going to move on to something that's relevant to this deposition.

10:39:08 MR. MOXON: Since the time you met François Orange and have appeared with him --

10:39:13 AGP: Yes.

10:39:13 MR. MOXON: -- at many of these raids.

10:39:15 AGP: Yes.

10:39:15 MR. MOXON: -- that he's addressed, have you been under the influence of medications that could affect the way you think?

10:39:23 MR. BERRY: Objection. Calls for speculation. Invades his privacy. If this line of questioning --

10:39:30 MR. MOXON: Let's go off the record --

10:39:30 MR. BERRY: -- is not going to cease --

10:39:30 MR. MOXON: [INAUDIBLE] the record a minute. Okay.

10:39:33 THE VIDEOGRAPHER: The time is 10:39 A.M. We're off record.

10:39:36 MR. BERRY: Okay.

10:39:36 - 10:45:06 [NO RECORDING]

10:45:06 MR. MOXON: [INAUDIBLE]

10:45:08 THE VIDEOGRAPHER: The time is 10:45 A.M. We are on the record.

10:45:11 MR. MOXON: Are you under the effect of any psychotropic medication?

10:45:14 MR. BERRY: First of all, counsel, we have a stipulation. We have agreed that this portion of the deposition relating to his medical information will be deemed confidential and not broadcast in any manner and availa-- and used only for the purposes of this litigation, within the context of this litigation -- meaning in another deposition or in the court.

10:45:39 MR. MOXON: [INAUDIBLE]

10:45:41 AGP: I take venlafaxine hydrochloride, which is the generic form of Effexor XR from Wyatt Laboratories for anxiety, and it helps me to stay on an even keel, to remember things, to not get nervous in raid situations, [INAUDIBLE].

10:46:03 MR. MOXON: Anything else?

10:46:05 AGP: No. No other prescribed brand medications like you said, no. Just Effexor.

10:46:12 MR. MOXON: So that Effexor is the only psychotropic medication you take?

10:46:16 AGP: Yes.

10:46:16 MR. MOXON: How long have you been taking it?

10:46:19 AGP: Uh, at least 8 years.

10:46:23 MR. MOXON: Okay, this ends the confidential portion of the transcript.

10:46:33 MR. MOXON: During the time that you started, as of February of 2008, when you started a -- a -- a relationship with AnonOrange, around or about February of 2008, were you taking any medications that, uh -- affect your thought processes?

10:46:55 AGP: Uh --

10:46:55 MR. BERRY: Objection. Calls for speculation as to what the effects of the medications are. And expert testimony.

10:47:01 MR. MOXON: Answer [INAUDIBLE].

10:47:03 AGP: Uh, I've been taking Effexor for eight years and that's all I've been taking. And, also, I didn't meet AnonOrange until months later. It was later than February.

10:47:14 MR. MOXON: As I had indicated, that confidential portion ended, Mr. Berry. So [INAUDIBLE] he's decided to testify on the record outside the confidential portion of it.

10:47:29 MR. MOXON: When you, uh -- Do you take any medication to control rage?

10:47:39 AGP: [laughs, shakes his head] If I were to take medication that controls rage, that -- Rage is controlled by the brain and that would be a brain medication, correct? And I already told you about that. You're lingering on this question and you're just trying to harass me, I feel.

10:47:59 MR. MOXON: Do you take any medication to --

10:48:02 MR. BERRY: Excuse me, counsel --

10:48:02 MR. MOXON: -- assist your memory?

10:48:02 MR. BERRY: -- before you ask.

[to Angry Gay Pope] Remember what I told you. [INAUDIBLE]

10:48:09 MR. MOXON: Do you take any medication to control rage?

10:48:13 AGP: No!

10:48:16 MR. MOXON: Do you take any, uh, medication to assist your memory?

10:48:22 [distracting noise]

10:48:25 AGP: No.

10:48:32 MR. MOXON: Do you have any, uh, medical disability?

10:48:36 AGP: Uh, other than HIV? I don't think.

10:48:40 MR. MOXON: Do you have any -- Has -- Has anyone told you that you have any, uh, mental disability?

10:48:46 AGP: Do you mean a -- a-- a medical professional?

10:48:50 MR. MOXON: We'll start with medical professionals, yes. Has any medical professional suggested to you that you have a mental disorder?

10:48:58 AGP: Uh, it was -- I went to a psychiatrist, years ago, who put me on, uh, that, uh, medication we discussed, and he told me that the reason I had high anxiety was that I was hyperactive

10:49:14 MR. MOXON: So you -- you -- you're a hyperactive. Is that a mental disorder?

10:49:18 MR. BERRY: Objection. Calls for speculation and expert testimony.

10:49:21 AGP: I think -- [shakes his head] No.

10:49:25 AGP: [to Mr. Berry] Sh--, I forgot.

10:49:25 MR. BERRY: [to Angry Gay Pope] You're volunteering stuff.

10:49:30 MR. MOXON: Are you under the influence of this medication as we -- sit here today?

10:49:36 AGP: Yes.

10:49:39 MR. MOXON: Are you employed?

10:49:41 AGP: I am self-employed.

10:49:46 MR. MOXON: Where?

10:49:05 AGP: In my home.

10:49:48 MR. MOXON: Do you have a business?

10:49:50 AGP: Yes, I have a small business.

10:49:52 MR. MOXON: What is it?

10:49:53 AGP: [coughs] I am a freelance movie artist.

10:50:01 MR. MOXON: Do you have a company?

10:50:02 AGP: It's called -- Yes I do.

10:50:01 MR. MOXON: What is it?

10:50:06 AGP: The name of the company?

10:50:06 MR. MOXON: Yes.

10:50:07 AGP: It's called P - I - X - S - E - L - L -- PIXSELL.

10:50:12 MR. MOXON: Are there any employees?

10:50:14 AGP: It's a sole proprietorship.

10:50:16 MR. MOXON: Just you?

10:50:17 AGP: That's what a sole proprietorship is.

10:50:22 MR. MOXON: You have no employees?

10:50:24 AGP: No.

10:50:26 MR. MOXON: [clears his throat] When did you last have a, uh, job -- as an employee?

10:50:32 AGP: Uh, October 2008.

10:50:36 MR. MOXON: With who was that?

10:50:39 AGP: Flash Film Works.

10:50:41 MR. MOXON: Were you fired?

10:50:42 AGP: No. We finished our work.

10:50:49 MR. MOXON: You have a web page called angrygaypope.com, --

10:50:52 AGP: Yes, I do.

10:50:53 MR. MOXON: -- right? And you're responsible for -- posting information on that page, correct?

10:50:57 AGP: Yes.

10:51:01 MR. BERRY: [to Angry Gay Pope] Much better answers.

10:51:01 MR. MOXON: You were never a -- member of the Church of Scientology, were you?

10:51:07 AGP: No, I have never been a Scientologist.

10:51:11 MR. MOXON: Do you have any family member or relative that was a member of, uh, Scientology?

10:51:15 AGP: No.

10:51:20 MR. MOXON: Did you have any prior relationship at all with Scientology before you started attacking it in -- circa February 2008?

10:51:27 AGP: I've never attacked anyone. That's -- I don't think that is the right way to term that question.

10:51:34 MR. MOXON: Before you started appearing at the Church and --

10:51:37 AGP: Protesting.

10:51:37 MR. MOXON: -- screaming at people in February --

10:51:40 AGP: I thought we agreed last time that you were gonna say "protesting", not "attacking". That's what you said last time.

10:51:45 MR. MOXON: Before February 2008, when you started appearing at churches, screaming at people, did you have any relationship with Scientology?

10:51:53 AGP: No, I had no relationship with the Church of Scientology International.

10:51:56 MR. MOXON: How did you first get with any Scientology entity?

10:52:01 AGP: Um, say that again?

10:52:02 MR. BERRY: Objection. Vague and ambiguous. Confusing.

10:52:03 MR. MOXON: Did you have any relationship with any Scientology entity before you started your screaming at -- at members circa February 2008?

10:52:13 MR. BERRY: Objection to the form of the question.

10:52:15 MR. MOXON: Answer.

10:52:17 AGP: Scientology has so many entities that there is no way for me to know how many there are or where these front groups are, so there's no way that I could accurately tell you in a blanket statement like that.

10:52:26 MR. MOXON: As far as you know. As far as you know.

10:52:29 AGP: As far as I know, no, I had no contact with Scientology.

10:52:34 MR. MOXON: [clears his throat] How did you first get involved in attacking Scientology?

10:52:40 AGP: You're using the word "attack" again. I'm not an attacker.

10:52:47 MR. MOXON: Let's say, before you began participating in what you've called "raids" against churches of Scientology.

10:52:52 AGP: Oh, okay.

10:52:53 MR. MOXON: Okay? So before you started, uh, participating in "raids" against churches of Scientology, uh, how did -- Well, how did you get involved in that?

10:53:05 AGP: How did I get involved before I got involved? I -- I don't understand the question.

10:53:09 MR. MOXON: Okay. How did you get involved these "raids"? Why did you do it?

10:53:12 AGP: Oh, okay. Well, uh, I had heard that, uh, this group called Anonymous was going to have public raids against the Church of Scientology. That was always something I had been interested in protesting. But I didn't get involved in the first one. I wanted to see what would happen and, when a lot of people showed up, I felt it was safe to go to the second one, which was in March.

10:53:40 MR. MOXON: But for what reason? Why did you care?

10:53:44 AGP: Why did I care?

10:53:45 MR. MOXON: Yeah.

10:53:46 AGP: Because the Church of Scientology is an anti-homosexual organization and I'm homosexual. Right?

10:53:56 MR. MOXON: No, it's not true. It's not a anti-homosexual organization, if you're asking me, but that's your reason anyway.

10:54:01 AGP: Yes.

10:54:02 MR. MOXON: Because you -- you believe that?

10:54:04 AGP: Yes. I read it in "Dianetics". Page 125 of "Dianetics".

10:54:09 MR. MOXON: So you -- Is it your intent to try to destroy Scientology?

10:54:14 AGP: No, the goal of Anonymous was the, uh, the dismantling of the Church of Scientology in its present form.

10:54:18 MR. MOXON: And you -- participated in that goal?

10:54:25 AGP: Yes.

10:54:36 MR. MOXON: Were you involved with, uh, the Anonymous group before you began participating in the "raids" against Scientology?

10:54:44 AGP: No.

10:54:46 MR. MOXON: Is, uh -- When did you first meet AnonOrange?

10:54:51 AGP: [exhales] I think it was some months -- it looks like probably three months, four months after I began protesting.

10:54:58 MR. MOXON: You met him at a "raid" -- against the Church of Scientology?

10:55:02 AGP: I believe, yes, I did. I don't remember which one, though. There were so many at that time.

10:55:10 MR. MOXON: How many have you been to?

10:55:13 AGP: Uh, how -- how many what have I been to?

10:55:15 MR. MOXON: How many times have you "raided" Scientology -- or churches of Scientology?

10:55:21 AGP: Many times.

10:55:22 MR. MOXON: More than fifty?

10:55:27 MR. BERRY: Counsel, point of clarification, as the term "raid".

10:55:33 MR. MOXON: It's his term. He's been using it.

10:55:35 MR. BERRY: Well, I don't --

10:55:35 AGP: I keep --

10:55:36 MR. BERRY: -- understand it. I -- I presume you're referring to a protest --

10:55:39 MR. MOXON: Mr. --

10:55:39 MR. BERRY: or a picket.

10:55:40 MR. MOXON: Mr. --

10:55:40 MR. BERRY: Is that what --

10:55:41 MR. MOXON: Mr. --

10:55:41 MR. BERRY: Is that how you're using it?

10:55:42 MR. MOXON: Mr. Berry, is this an objection?

10:55:44 MR. BERRY: Well, it's objection, vague, ambiguous, unintelligible as to the word "raid" -
-

10:55:48 AGP: Mm-hmm.

10:55:48 MR. BERRY: --until we can clarify what you mean by it.

10:55:50 MR. MOXON: Uh, actually, it's a coaching, uh, statement. Why, there's not even a question pending.

10:55:55 MR. BERRY: Well, then if there's no [INAUDIBLE] question pending, then I guess I'm not coaching.

10:56:04 MR. BERRY: So by the word "raid", do you mean a protest or do you mean something else? Can we have that understood for the purpose of the deposition and any subsequent use of the deposition?

10:56:23 MR. MOXON: So when did you first meet AnonOrange?

10:56:25 AGP: I think that it was about three or four months after my first public protest, which I believe was in --

10:56:32 MR. MOXON: See what I mean?

10:56:33 AGP: -- March --

10:56:33 MR. MOXON: He just changed it. Th-- he calls it "raids". Now you make a speaking objection and he changes it -- the name to try to --

10:56:38 AGP: I've been --

10:56:39 MR. MOXON: -- Angry Gay Pope --

10:56:39 MR. BERRY: Well now, we can at least -- we can at least --

10:56:39 AGP: I've been trying to get you to say "protest" from the beginning.

10:56:41 MR. BERRY: -- understand what we're talking about.

10:56:42 AGP: I've been trying to get you to say "protest" from the beginning and you refuse. Why can't you just say "protest"?

10:56:47 MR. MOXON: You call 'em "raids", right?

10:56:49 AGP: I want to call them "protests". There are different kinds of raids just like there are different kinds of orgs and ideal orgs and missions.

10:56:56 MR. MOXON: Were you involved in any, uh, computer attacks against Scientology?

10:57:00 AGP: No.

10:57:02 MR. MOXON: Any DDOS attacks?

10:57:03 AGP: No, I -- I'm a c-- Mm-mm.

10:57:07 MR. MOXON: What aliases have you used to post messages, uh, concerning Scientology?

10:57:14 AGP: A--

10:57:14 MR. BERRY: Lacks foundation.

10:57:15 MR. MOXON: Answer.

10:57:16 MR. BERRY: Objection.

10:57:19 MR. MOXON: Answer.

10:57:20 AGP: What aliases have I used?

10:57:22 MR. MOXON: Yeah.

10:57:23 AGP: I only use one. Angry Gay Pope.

10:57:27 MR. MOXON: Or AGP?

10:57:29 AGP: No, that's a jack-- that's an acronym. I just call myself "Angry Gay Pope" or, if that name has been taken, or if something happened to that name, I call myself "AngryGayPope1".

10:57:40 MR. MOXON: What does "Angry Gay Pope" mean, by the way?

10:57:44 AGP: "Angry Gay Pope" is a code name and that was the name that people gave me at raids.

10:57:54 MR. MOXON: Because you're angry?

10:57:56 AGP: I guess I was angry at those early raids and I was wearing a Pope hat and I was openly gay. As you know, a Pope is someone who is starting a religion of their own.

10:58:16 AGP: [yawns]

10:58:18 MR. MOXON: So --

10:58:28 MR. MOXON: Tell me where you've posted messages concerning Scientology. What websites or discussion groups.

10:58:36 AGP: Well --

10:58:36 MR. BERRY: Objection. Relevance.

10:58:45 MR. MOXON: Answer.

10:58:47 MR. BERRY: [to Angry Gay Pope] You answer [INAUDIBLE].

10:58:49 AGP: Uh, I have posted on whyweprotest.net. I have posted on Ex-Scientologist Message Board. I have posted on YouTube. And I have posted on, uh, ARS, the alt religion scientology.

Oh, and I -- I just remembered the alias I use on YouTube was AngryGayPope and now I use TheEndOfScientology. So all of my aliases are either Angry Gay Pope, AngryGayPope1, or TheEndOfScientology.

10:59:26 MR. MOXON: Have you ever been suspended from YouTube for, uh, putting up messages violating the rights of Scientologists?

10:59:34 AGP: No. Do you mean text messages?

10:59:38 MR. MOXON: No. Videos.

10:59:40 AGP: Uh, I was, uh, kicked off of YouTube for posting, uh, modest videos that, later, I posted again and YouTube has allowed, under a different account.

10:59:53 MR. MOXON: So you were kicked off of YouTube for violating the privacy rights of Scientologists. Is that correct?

10:59:58 AGP: No, Scientology colluded to get me kicked off of YouTube, because they didn't like my videos. And you can't do that any more, because you would've thrown those videos off again, and you haven't.

11:00:12 MR. MOXON: Why did YouTube tell you they were kicking you off?

11:00:16 AGP: Uh, because, uh, people had flagged my videos as spam.

11:00:27 MR. MOXON: That's your sworn testimony?

11:00:29 AGP: And --

11:00:29 MR. MOXON: Flagged as spam and that's why you were taken off?

11:00:32 AGP: They've -- They've -- They were flagged as spam or they were, uh, said to be, uh -- I can't remember the reason now. But, uh, eventually, after three videos are thrown off, then your account is, uh, suspended.

11:00:59 MR. MOXON: So you opened a new account and put You -- the videos back up again?

11:01:04 AGP: Uh, yes.

11:01:06 MR. MOXON: And that's TheEndOfScientology?

11:01:08 AGP: Yes.

11:01:08 MR. MOXON: The same videos back up?

11:01:10 AGP: Yes and they are there today. And right there, on my account -- is where they are.

11:01:21 MR. MOXON: Do you have a vimeo channel?

11:01:23 AGP: Yes, I have a vimeo channel.

11:01:24 MR. MOXON: What's the name of it?

11:01:26 AGP: I -- I'm sure it's Angry Gay Pope.

11:01:29 MR. MOXON: Do you have, uh, any other video channels anywhere?

11:01:32 AGP: I have a rutube account. A long time ago, I posted some videos there. In Russia.

11:01:38 MR. MOXON: Russia?

11:01:38 AGP: Yes.

11:01:39 MR. MOXON: That's -- What's the name of it?

11:01:41 AGP: rutube.ru

11:01:44 MR. MOXON: r-u-tube?

11:01:46 AGP: Yes. r-u-t-u-b-e dot r-u. r-u is the code for the S-- the country of Russia.

11:01:54 MR. MOXON: Any other video channel?

11:01:57 AGP: No.

11:02:01 MR. MOXON: And you post where?

11:02:05 AGP: Uh, what do you mean by post --

11:02:07 MR. BERRY: Objection. Asked and answered.

11:02:08 MR. MOXON: Where do put postings? Messages. Text messages.

11:02:13 AGP: Only on YouTube.

11:02:15 MR. MOXON: How about whyweprotest.com? Do you post there?

11:02:17 AGP: dot net.

11:02:18 MR. MOXON: dot net.

11:02:18 AGP: whyweprotest.net.

11:02:20 MR. MOXON: Do you post there?

11:02:20 AGP: No. I'm banned from there.

11:02:23 MR. MOXON: Do you post under --

11:02:23 MR. BERRY: Excuse me.

11:02:25 MR. BERRY: [to Angry Gay Pope] Remember what I said.

11:02:25 AGP: Mm.

11:02:27 MR. MOXON: Do you post under any anonymous name?

11:02:29 AGP: No.

11:02:31 MR. MOXON: How about Exscn.net? Do you post there?

11:02:35 AGP: No.

11:02:36 MR. MOXON: How about exscientologykids.com? Do you post there?

11:02:40 AGP: I may have, a very long time ago.

11:02:50 MR. MOXON: Do you know what, uh, user names or screen names AnonOrange has used in any postings?

11:02:59 AGP: He has a YouTube account where his YouTube name is g-n-s-s-e-n-g-r, I think, and another one where his YouTube name is AnonOrange.

11:03:11 MR. MOXON: Any others?

11:03:11 MR. BERRY: [to Angry Gay Pope] [INAUDIBLE]

11:03:14 AGP: No. No. No, I don't think so.

11:03:23 MR. MOXON: Have you ever made any postings on any chan page, like 4chan's, 7chan's, 777chan?

11:03:28 AGP: No.

11:03:45 MR. MOXON: Is the purpose of the, uh -- these Anonymous raids that -- we've been discussing, uh, to dismantle Scientology, or is it -- does -- does it have an additional purpose?

11:03:57 MR. BERRY: Objection. Calls for speculation.

11:04:01 AGP: No.

11:04:01 MR. MOXON: Is that part of your purpose?

11:04:05 AGP: The goal --

11:04:05 MR. MOXON: To attending these raids?

11:04:07 AGP: The goal of Anonymous is the, uh -- I just told you earlier.

11:04:12 MR. MOXON: Dismantling of Scientology?

11:04:14 AGP: In its present form.

11:04:16 MR. MOXON: Uh, do you try to stop people from buying Scientology books? Have you ever done that?

11:04:25 AGP: There's no one to stop. No one buys them.

11:04:31 MR. MOXON: Angry Gay Pope, have you ever tried to stop --

11:04:32 AGP: No. No.

11:04:35 MR. MOXON: Have you ever, uh, well, it's -- So you -- these -- These raids that you've been to --

11:04:36 [loud snapping sound]

11:04:40 MR. MOXON: Well -- it's -- So you -- These --

11:04:45 AGP: [clears his throat]

11:04:45 MR. MOXON: These raids that you've been --

11:04:46 AGP: Excuse me, --

11:04:46 MR. MOXON: -- to --

11:04:47 AGP: -- just one second. [coughs]

11:04:49 MR. MOXON: These raids that you've been to at churches of Scientology, we haven't really gotten a number, but do you think it's more than fifty times?

11:04:56 AGP: No.

11:04:57 MR. MOXON: Less than fifty?

11:04:58 AGP: Yes.

11:04:59 MR. MOXON: How many times have you appeared at a church or mission of Scientology?

11:05:06 AGP: I would say between forty and fifty.

11:05:10 MR. MOXON: In the past two years, two and a half years?

11:05:12 AGP: Yeah. Yes.

11:05:19 MR. MOXON: And one of the places where you've been is the, uh, churches of Scientology in the Hollywood area at L. Ron Hubbard Way and Sunset Boulevard, correct?

11:05:33 AGP: Uh, yes, correct.

11:05:35 MR. MOXON: And you've been there more than twenty times, right?

11:05:40 AGP: Yes.

11:05:42 MR. MOXON: When you go, you sometimes walk around the different buildings, kind of roam around the buildings, right?

11:05:50 AGP: Yes.

11:05:51 MR. MOXON: And you yell in the proximity of the churches, yell loudly, correct?

11:05:59 AGP: Yes.

11:06:00 MR. MOXON: [INAUDIBLE] Do you look for windows, open windows, to yell into, to yell inside?

11:06:07 AGP: Yes.

11:06:08 MR. MOXON: Do you look for when doors open, you yell?

11:06:10 AGP: Yes.

11:06:10 MR. MOXON: Inside the door to [INAUDIBLE] of the churches like the Advanced Organization of Los Angeles -- that's one of them -- at the corner of L. Ron Hubbard Way and Fountain?

11:06:21 AGP: Yes.

11:06:22 MR. MOXON: And the American Saint Hill Organization on L. Ron Hubbard Way?

11:06:27 AGP: Is that what -- where the lion statue is?

11:06:29 MR. MOXON: That's correct.

11:06:30 AGP: Yes.

11:06:32 MR. MOXON: And the Church of Scientology of Los Angeles, which is the farthest north church on L. Ron Hubbard Way?

11:06:40 AGP: Do you mean the ideal org?

11:06:41 MR. MOXON: That's right, yes.

11:06:43 AGP: Well, uh, that's clo-- that's on your property, so I never get close to there.

11:06:49 MR. MOXON: [INAUDIBLE]

11:06:50 MR. BERRY: Let's take a two-minute break.

11:06:55 THE VIDEOGRAPHER: Okay.

11:06:55 MR. BERRY: How long have we been going?

11:06:59 MR. MOXON: [clears his throat] Sorry?

11:07:00 [MAN's VOICE]: We off the record?

11:07:00 MR. MOXON: No, we're on the record.

11:07:02 MR. BERRY: Let's take a break. I'm going to go to the bathroom for a moment.

11:07:04 MR. MOXON: Okay. Yes.

11:07:07 THE VIDEOGRAPHER: Now it's 11:07 A.M. we are off the record.

11:07:08 MR. BERRY: Thank you.

11:07:08 - 11:10:25 [NO RECORDING]

11:10:25 MR. BERRY: [laughs]

11:10:28 THE VIDEOGRAPHER: And it's 11:10 A.M. We are on the record.

11:10:37 MR. MOXON: Do you yell into the doors and windows of the -- the churches on L. Ron Hubbard Way because you want people to hear you?

11:10:47 AGP: Yes.

11:10:49 MR. MOXON: You want them to hear you from inside the churches, right?

11:10:54 AGP: Yes.

11:10:59 MR. MOXON: You know that there are Scientology classes ongoing in those buildings?

11:11:08 AGP: No, I don't.

11:11:09 MR. MOXON: Do you know that people study Scientology in those buildings?

11:11:15 AGP: I thought it w-- I thought it was a church.

11:11:19 MR. MOXON: It is a church. What do you think happens in the buildings?

11:11:22 MR. BERRY: Objection. Calls for speculation.

11:11:25 MR. MOXON: --t sure of what your understanding of what happens inside the church buildings.

11:11:28 MR. BERRY: Objection. Irrelevant.

11:11:30 MR. MOXON: Answer.

11:11:31 AGP: I'm not a Scientologist. I don't know.

11:11:33 MR. MOXON: What do you -- What's your understanding, I'm just saying, that goes on in the buildings?

11:11:36 MR. BERRY: Objection. Irrelevant. Calls for speculation. Lacks foundation. Nothing to do with this lawsuit.

11:11:46 MR. MOXON: Answer.

11:11:47 AGP: Uh, when I s-- look in there, I don't see anyone, almost at all. So I don't know.

11:11:54 MR. MOXON: What do you think goes on inside a Church of Scientology? What do you --

11:11:56 MR. BERRY: Now --

11:11:57 MR. MOXON: -- think people are doing in there?

11:12:02 AGP: When I went to -- Well -- So the Pasadena ideal org is a Church of Scientology, right?

11:12:08 MR. MOXON: That's right.

11:12:09 AGP: And I did go in there. And all I saw was people trying to sell me things and no customers.

11:12:16 MR. MOXON: Did you go on the second floor, where all the course rooms were?

11:12:21 AGP: Uh, no, but I never saw anyone --

11:12:22 MR. MOXON: Did you go --

11:12:22 AGP: -- go up there.

11:12:23 MR. MOXON: Did you go on the third floor, where all the auditing rooms?

11:12:25 AGP: No.

11:12:27 MR. MOXON: You've heard of Scientology courses? Have you ever heard of that term?

11:12:30 MR. BERRY: Objection, Mr. Moxon. This has got nothing to do with this lawsuit. This is obviously got something to do with something else and some other agenda you have. But if we don't get to the Orange lawsuit soon, we will be departing.

11:12:41 AGP: Mm-hmm.

11:12:43 MR. MOXON: S-- Will you just stop threatening to leave --

11:12:45 MR. BERRY: I'm not -- Well --

11:12:45 MR. MOXON: every -- every several minutes, Mr. Berry?

11:12:47 MR. BERRY: This is the second time --

11:12:48 MR. MOXON: You can make an objection. If you wish to make an objection, make an objection.

11:12:50 MR. BERRY: I made the obj-- objection, and if you don't get on to the Orange lawsuit shortly, we will be leaving and assuming you've got no questions to ask about the Orange lawsuit.

11:13:00 MR. MOXON: You --

11:13:00 MR. CANTRELL: Why he's doing this and -- and what he thinks he's doing certainly goes to the bias of the witness, what-- which we're entitled to inquire to. And if he's gonna to leave for that, that's gonna be a slam dunk motion to compel to get him back here again.

11:13:13 MR. MOXON: Let me also note that I'll ask you this and, hopefully, this'll edify your attorney a little bit, AnonOrange. You, uh -- I mean, Angry Gay Pope -- you're often there with AnonOrange, aren't you? At these churches when you're doing these raids or protests.

11:13:30 AGP: No.

11:13:31 MR. MOXON: You some-- You're occasionally there with AnonOrange, aren't you?

11:13:34 AGP: Yes.

11:13:35 MR. MOXON: Okay. And occasionally you walk around AnonOrange and similarly yell into the -- the doors or at the buildings or into the windows of the churches, right?

11:13:45 AGP: Yes.

11:13:52 MR. MOXON: Do you want the people inside to hear you when you do that?

11:13:56 AGP: Yes.

11:14:04 MR. MOXON: Do you think the, uh, people inside will be, uh, upset by some man screaming outside into their church?

11:14:12 MR. BERRY: Objection. Calls for speculation.

11:14:16 AGP: When I say things like, "You deserve a living wage," how's that supposed to upset them?

11:14:20 THE VIDEOGRAPHER: Was it using?

11:14:20 AGP: "You deserve a living wage."

11:14:25 MR. MOXON: Can you answer my question? So you -- you have no intention of just -- of upsetting anyone when you yell at them?

11:14:31 AGP: I want to educate people.

11:14:34 MR. MOXON: Mm-hmm. So when you'd say -- Is it an education to tell someone, "Run away, you coward"? Would that be an educational speech?

11:14:45 MR. BERRY: Objection. Calls for speculation.

11:14:47 MR. MOXON: Answer.

11:14:49 MR. BERRY: Lacks foundation.

11:14:52 AGP: Debbie Cook thought it was the right thing to do.

11:14:53 MR. MOXON: Can -- Angry Gay Pope, can you answer my question? When you say, "Run away, you cowards," would that be educational?

11:14:59 MR. BERRY: Objection. Calls for speculation.

11:15:03 AGP: Educational would be, uh, David Miscavige --

11:15:04 MR. MOXON: No! Answer my question! You're answering -- You're asking a -- I'll give you a different question. Are all -- When you say to people, "Run away. You're all cowards," would that -- Is that an educational statement? Is that what you're saying now?

11:15:18 MR. BERRY: Objection. Lacks foundation.

11:15:21 AGP: Okay. Let's play the video. [INAUDIBLE]

11:15:28 AGP: Finally!

11:15:28 MR. MOXON: While he's getting it, do you recall appearing, uh, with AnonOrange on July 31st, 2010 at L. Ron Hubbard Way?

11:15:38 AGP: Yes.

11:15:42 MR. MOXON: And you put up on YouTube, in fact, a -- a video of the incident.

11:15:48 AGP: Yes. And when I shouted at those --

11:15:50 MR. MOXON: Isn't that correct?

11:15:51 AGP: Yes, I put it up. Yes.

11:15:52 MR. MOXON: [INAUDIBLE] okay.

11:16:00 MR. MOXON: I'm going to, uh, play a portion of a video for you. I'd like you to look at.

11:16:05 AGP: Sure.

11:16:06 MR. MOXON: And if we can --

11:16:10 THE VIDEOGRAPHER: [INAUDIBLE] laptop?

11:16:10 MR. MOXON: You don't need to transcribe it, but we'll include it in the video portion.

11:16:27 [VIDEO APPEARS ON A MURAL SCREEN]

11:16:41 MR. MOXON: Uh, don't play yet. So that -- The video that you posted had a -- had a title that you put over it, right?

11:16:47 AGP: Yes.

11:16:48 MR. MOXON: And the title that you put on the video of, uh, the incident at July 31st, 2010 at the churches of Scientology there is, quote "Scientology Protesters Interrupt Horse-Based IAS Ceremony in L.A."?

11:17:05 AGP: Yes.

11:17:06 MR. MOXON: And IAS stands for International Association of Scientologists?

11:17:08 AGP: Yes.

11:17:11 MR. MOXON: Did you write that title?

11:17:13 AGP: Yes.

11:17:14 MR. MOXON: And you posted the video on YouTube?

11:17:16 AGP: Yes.

11:17:17 MR. MOXON: Uh, I just want to play this for you.

11:17:25 [PLAYS VIDEO]

11:20:15 [VIDEO ENDS]

11:20:23 MR. MOXON: We'll mark that, uh, exhibit as -- What's the next [INAUDIBLE]?

11:20:28 MR. CANTRELL: It's Exhibit Thirty-Six. [INAUDIBLE]

11:20:34 MR. MOXON: Oh, it's exhibit Number Thirty-Six. It's already, uh, in the, uh -- marked in the Orange deposition.

11:20:42 MR. MOXON: So that, uh, that video that we've just played, which is Exhibit Number Thirty-Six, the Orange deposition, was created by you?

11:20:50 AGP: Yes.

11:20:50 MR. MOXON: And AnonOrange?

11:20:54 AGP: Created? No.

11:20:56 MR. MOXON: Was Mis-- Did AnonOrange video part of that also?

11:20:58 AGP: No.

11:20:59 MR. MOXON: That was all your video?

11:21:02 AGP: Of the location.

11:21:04 MR. MOXON: That whole video was -- was recorded by you.

11:21:08 AGP: Did I? No.

11:21:09 MR. MOXON: Who also recorded it?

11:21:11 AGP: Whoever shot that horseman.

11:21:14 MR. MOXON: The video that you posted on the internet.

11:21:17 AGP: Yes.

11:21:17 MR. MOXON: Was that recorded only by you?

11:21:19 AGP: No.

11:21:20 MR. MOXON: Who else?

11:21:21 AGP: The Church of Scientology created part of it.

11:21:23 MR. MOXON: Okay. The first part of it, you took off some promotional --

11:21:26 AGP: Yes.

11:21:28 MR. MOXON: So you -- So you copied it off a Church of Scientology promotional --

11:21:32 AGP: Yes.

11:21:32 MR. MOXON: The first part of it. And the rest of it -- of the incident where you and Orange were at the church there, on L. Ron Hubbard Way, was that all shot by you?

11:21:42 AGP: Yes

11:21:43 MR. MOXON: Did AnonOrange video part of it also? Do you know if he did a video?

11:21:47 MR. BERRY: Objection. Calls for speculation.

11:21:49 AGP: I don't know.

11:21:58 MR. MOXON: It appeared that you, uh, broke up the gathering that was there, didn't it?

11:22:03 MR. BERRY: Objection. Calls for speculation.

11:22:07 MR. MOXON: The gathering broke up when you yelled at the people, right?

11:22:11 MR. BERRY: Objection.

11:22:12 MR. MOXON: Answer.

11:22:14 MR. BERRY: The video speaks for itself.

11:22:15 AGP: Yes. You saw what happened.

11:22:19 MR. MOXON: Was your intention to -- disrupt the gathering?

11:22:23 AGP: That's what protests do. Enturbulation. Not disruption. Enturbulation.

11:22:28 MR. MOXON: And how would you define enturbulation?

11:22:30 AGP: Enturbulation is the creation of turbulence.

11:22:33 MR. MOXON: To upset people? Could we generically say enturbulation would be to upset someone?

11:22:39 AGP: Uh, well LRH's definition of enturbulation is the creation of turbulence. My definition might be that enturbulation is more than annoying, but it's less than harassment.

11:22:53 MR. MOXON: That's what you were intending to do?

11:22:54 AGP: Enturbulate.

11:22:56 MR. MOXON: And to break up the -- the gathering of Scientologists.

11:22:59 MR. BERRY: Objection. Asked and answered.

11:23:02 MR. MOXON: Correct?

11:23:04 AGP: Mm. [Shakes his head.] What he said.

11:23:10 MR. MOXON: Answer the question. Part of your purpose was to break up the gathering of Scientologists and make them run inside. [QUES]

11:23:17 MR. BERRY: Objection. Calls for speculation.

11:23:21 MR. MOXON: You can answer.

11:23:22 MR. BERRY: Video speaks for itself.

11:23:23 AGP: Yes, exactly.

11:23:25 MR. MOXON: Answer the question or refuse to answer it.

11:23:28 AGP: I refuse to answer it because the answer is self-evident.

11:23:31 MR. MOXON: Well, it's not an appropriate objection to a question is that the answer is self-evident. As I understand it, the self-evidence of it is that you intended to break up the gathering. Am I correct?

11:23:42 AGP: We intended to protest.

11:23:44 MR. MOXON: That's not what I asked you. Did you intend to break up the group of people? Yes or no?

11:23:48 MR. BERRY: Objection. Asked and answered. You apparently are not getting the answer you want, Mr. Moxon, but that doesn't mean you have to keep asking the same question.

11:23:57 AGP: Answer.

11:24:00 MR. BERRY: Objection. Asked and answered.

11:24:02 MR. MOXON: Mr. Berry, "asked and answered" is not a, uh -- a recognized --

11:24:07 AGP: [Makes blah-blah hand gesture]

11:24:10 MR. MOXON: -- objection. It's not an objection in any rules of evidence. Uh, it's a -- It's a way to coach someone, perhaps, to avoid answering a question you don't want them to answer, but it's not an appropriate objection.

11:24:23 MR. BERRY: Neither it is --

11:24:24 MR. MOXON: Now --

11:24:24 MR. BERRY: -- is it appropriate, Mr. Moxon, to keep asking --

11:24:26 MR. MOXON: I don't wanna -- I don't wanna --

11:24:27 MR. BERRY: -- the same question.

11:24:27 MR. MOXON: I don't wanna a-- argue with you, Mr. Berry

11:24:29 MR. BERRY: Thank you.

11:24:30 MR. MOXON: When you said, "You --" "All you people are about to run away," what did you mean by that?

11:24:35 AGP: I meant that they were not dauntless and defiant.

11:24:38 MR. MOXON: And that they were about to leave their gathering and run inside the church?

11:24:43 AGP: Yes.

11:24:45 MR. MOXON: Because you were out there yelling at them, right?

11:24:49 MR. BERRY: Objection. Calls for speculation.

11:24:55 AGP: You're speculating.

11:24:57 MR. MOXON: Answer.

11:24:59 MR. BERRY: Objection.

11:24:59 AGP: Yes.

11:25:18 MR. MOXON: What's the next number? For the -- his deposition?

11:25:21 THE VIDEOGRAPHER: [INAUDIBLE]

11:25:22 MR. MOXON: Do we mark any for the --

11:25:22 MR. CANTRELL: We don't have any --

11:25:23 MR. MOXON: Okay.

11:25:22 MR. CANTRELL: -- deposition.

11:25:24 MR. MOXON: So I'm marking as Exhibit One to this deposition.

11:25:38 MR. MOXON: The, uh, screenshot of that video on YouTube -- [hands a sheet of paper to Angry Gay Pope]

11:25:41 AGP: Mm-hmm.

11:25:48 MR. MOXON: There's, uh, text that's included with this, uh, this video which says, "We were tipped off by a spy inside Scientology who told us about this IAS horse-related event. So thanks for making this possible, mystery person. Protester AnonOrange and I take two entire minutes to clear the street, L. Ron Hubbard Way, of Scientologists." Did you write that text?

11:26:18 AGP: Yes, I did.

11:26:20 MR. MOXON: And this is your YouTube site, TheEndOfScientology?

11:26:23 AGP: Yes.

11:26:28 MR. MOXON: In fact, were you tipped off by a s-- by a quote "spy" inside Scientology who told you about the, uh, event?

11:26:34 AGP: No.

11:26:36 MR. MOXON: You just made that up.

11:26:38 AGP: Yes.

11:26:50 MR. BERRY: Mr. Moxon, it's nearly an hour and there's not been one question about anything to do with Gilman Hot Springs, Hemet, or AnonOrange's incident that is the basis of this lawsuit.

11:27:01 MR. MOXON: How did you know this -- event was taking place?

11:27:04 AGP: I didn't.

11:27:09 MR. MOXON: Just a random raid?

11:27:12 AGP: Yes.

11:27:35 MR. MOXON: Do you know if AnonOrange takes any medications?

11:27:38 AGP: No.

11:27:38 MR. BERRY: Objection. Calls for speculation.

11:27:44 MR. MOXON: Mr. Berry, I'm really objecting to your coaching objections. When I ask him if he knows something and you tell him it calls for speculation, that's -- that's coaching the witness, because it's a completely non sequitur objection. So your purpose is to disrupt the deposition and coach him. If I ask --

11:28:02 MR. BERRY: I --

11:28:02 MR. MOXON: -- if someone knows, obviously, it's not speculation for him to answer whether or not he knows. So I'd appreciate it if you would stop that. I am going to seek sanctions against you for wasting our time in this deposition --

11:28:15 AGP: [laughs]

11:28:15 MR. MOXON: -- and extending the time --

11:28:16 MR. BERRY: Mr. Moxon, --

11:28:17 MR. MOXON: -- with your pointless objections.

11:28:17 MR. BERRY: -- I don't have any intent to disrupt anything, but I would like to see this deposition move to something that's relevant to the actual lawsuit, and not some other agenda that you have against this witness.

11:28:28 MR. MOXON: Do you know if AnonOrange takes any medications?

11:28:32 AGP: No, I do not know.

11:28:34 MR. MOXON: Has he ever told you at any time that he was taking any medications?

11:28:37 AGP: No, he has not.

11:28:40 MR. MOXON: Has he ever mentioned to you that he was taking lithium?

11:28:43 AGP: No.

11:28:44 MR. MOXON: Do you know if he's seen a psychiatrist?

11:28:47 AGP: No.

11:28:47 MR. MOXON: Do you know --

11:28:48 AGP: I don't know.

11:28:48 MR. MOXON: -- if he's getting any mental health treatment at all?

11:28:50 AGP: No, I don't know.

11:28:58 MR. MOXON: Do you know if AnonOrange, uh, dances? Goes dancing?

11:29:04 AGP: Yes, I -- I think he -- he does. Or he did.

11:29:07 MR. MOXON: Do you know where?

11:29:09 AGP: No.

11:29:10 MR. MOXON: How do you know that?

11:29:11 AGP: Because he had trouble, uh, when he was barred from Gold Base to go to his dance lessons, and he asked the judge in the -- in the courtroom, "Can I have, like, a -- a waiver to drive past Gold Base to go to my dance lessons?" And I was in the courtroom that day, so I heard him say it.

11:29:27 MR. MOXON: Are those the dance lessons he was taking at the casino?

11:29:30 AGP: I don't -- I don't know where he was taking them, but they were somewhere where he had to go past Gold Base, and he couldn't do that because of the, uh, temporary restraining order.

11:29:39 MR. MOXON: Do you know how long he was taking the dance lessons after that incident?

11:29:43 AGP: No. I only recall that mentioning -- that being mentioned once.

11:29:51 MR. MOXON: And the basis of your knowledge is discussions with AnonOrange? And your observing of what happened in court?

11:29:58 AGP: I don't understand the question. Is this just regarding the dance lessons?

11:30:01 MR. MOXON: Yes.

11:30:02 AGP: Uh, my only knowledge of the dance lessons is what I heard, uh, in court.

11:30:06 MR. MOXON: And he told you that's where he was going, to dance lessons?

11:30:09 AGP: No, he -- he told the commissioner and I was just sitting there and I heard it.

11:30:14 MR. MOXON: [clears his throat] But -- Right. Did he -- Did he tell YOU that that's where he was going, to dance lessons?

11:30:19 MR. BERRY: Objection. Asked and answered.

11:30:22 AGP: No, I don't -- I do not recall. To the best of my knowledge, I don't recall.

11:30:26 MR. MOXON: You don't recall how you got that information?

11:30:28 AGP: No, I reca--

11:30:29 MR. BERRY: Objection. Asked and answered. He's said it twice. Three times.

11:30:33 MR. MOXON: You don't recall where you got the information that he was going to dance lessons?

11:30:37 AGP: Oh, I do recall. I just told you that the commissioner said -- He said it to the commissioner, and I was in the room, so I heard it.

11:30:42 MR. MOXON: Really? Okay. I only say this to see if I can refresh your recollection that I was sitting there too and he didn't mention dance lessons.

11:30:50 MR. BERRY: Are you testifying, --

11:30:51 MR. MOXON: So --

11:30:51 MR. BERRY: -- counsel, or is Mr. --

11:30:52 MR. MOXON: Mr. -- Mr. Berry, will you please mind your manners and let me ask the question? So what I ask you -- Do you recall where else you may have learned that it was dance lessons, other than hearing it in court?

11:31:06 AGP: I remember specifically hearing it in court. It's possible that he may have discussed it, but it was such a minor issue that I promptly forgot it.

11:31:13 MR. MOXON: Okay.

11:31:14 AGP: It's possible. To the best of my recollection.

11:31:19 MR. MOXON: Have you ever seen AnonOrange get angry?

11:31:24 AGP: Get angry.

11:31:25 MR. MOXON: Yes.

11:31:27 AGP: Uh, yes.

11:31:29 MR. MOXON: In fact, he gets in -- he got in trouble with other Anonymous members because he has such a short temper, right?

11:31:36 AGP: Uh --

11:31:36 MR. BERRY: Objection. Calls for speculation.

11:31:38 AGP: You would have to --

11:31:39 MR. BERRY: Lacks foundation.

11:31:39 AGP: -- talk to other members of Anonymous. I don't --

11:31:42 MR. MOXON: I'm -- Now I'm only asking what you observed. That other -- other members of Anonymous were upset with him because he was acting in such an angry fashion during these raids.

11:31:53 MR. BERRY: Is that a question to be answered?

11:31:55 MR. MOXON: Answer.

11:31:56 AGP: I never saw that happen.

11:31:58 MR. MOXON: You never saw him act angry during raids?

11:32:00 AGP: No. I never at-- I thought you -- Was your -- Is your question, "Have I seen him angry at raids?" or is your question, "Have I seen other Anonymous members critical of him at the raid?" Which -- Which question is that?

11:32:14 MR. MOXON: Oh, the first. Have you seen him very angry at raids?

11:32:17 AGP: Uh, yes.

11:32:22 MR. MOXON: Have you ever HEARD of other Anonymous members critical of him because he's so angry and wild at raids?

11:32:28 AGP: Uh, I read things online.

11:32:31 MR. MOXON: The answer is yes?

11:32:32 AGP: Yes.

11:32:35 MR. MOXON: Have you -- Have you ever seen him act kind of crazy?

11:32:40 MR. BERRY: Objection.

11:32:40 AGP: No! [laughs]

11:32:41 MR. BERRY: Calls for --

11:32:42 MR. MOXON: Have you seen him --

11:32:43 AGP: What does "crazy" mean?

11:32:44 MR. BERRY: -- speculation.

11:32:44 AGP: "Crazy" is of -- just a total -- could mean anything.

11:32:47 MR. MOXON: To some people, perhaps.

11:32:49 AGP: To some people -- Some people would say LRH was crazy.

11:32:52 MR. MOXON: Mm-hmm.

11:32:52 AGP: Scientology says LRH is perfect. It's a very -- "Crazy", that's not a medical term.

11:32:58 MR. MOXON: Have you ever been 5150?

11:33:01 AGP: I --

11:33:02 MR. BERRY: Objection. Vague, ambiguous, confusing.

11:33:07 AGP: I don't understand the question.

11:33:10 MR. MOXON: Since you've been, uh, performing these raids and dealing with Mr., uh, Orange, have you ever been required under section 5150 to be held for observation?

11:33:25 MR. BERRY: Ah!

11:33:26 MR. MOXON: Say, for a two-hour hold?

11:33:28 AGP: No!

11:33:32 MR. MOXON: Have you ever been held for mental observation in the past two years?

11:33:36 AGP: No.

11:33:38 MR. MOXON: Have you ever been institutionalized in the past two years?

11:33:41 AGP: Uh, what -- what do you mean by institutionalized?

11:33:44 MR. MOXON: Been in a psychiatric institution.

11:33:46 AGP: Oh, no.

11:33:54 MR. MOXON: Do you know if part of AnonOranges's goal is to, uh, enturbulate Church members? Similar to what you described earlier?

11:34:03 AGP: Yes.

11:34:06 MR. MOXON: Yeah, you know, I -- I -- I asked the question in a vague way. So gee. [short exhaling laugh] Do you know if AnonOrange's goal is to enturbulate Church members?

11:34:16 AGP: Yes.

11:34:17 MR. MOXON: Okay. Has he told you he wants to enturbulate Church members?

11:34:23 AGP: No. The -- The goal -- The goal of protesters is to enturbulate. He is a protester, therefore his goal is to enturbulate.

11:34:31 MR. MOXON: Do you ever talk to him about it?

11:34:33 AGP: About whether we should enturbulate or not?

11:34:35 MR. MOXON: Yes.

11:34:36 AGP: No.

11:34:37 MR. MOXON: Because you assume that that's what you're doing?

11:34:40 AGP: Yes.

11:34:42 MR. MOXON: Has Orange ever told you he'd like to hurt anyone?

11:34:46 AGP: No!

11:34:48 MR. MOXON: Do you know if he possesses any weapons?

11:34:51 AGP: No, I do not know.

11:34:54 MR. MOXON: Have you ever heard him talk about hurting himself?

11:34:58 AGP: No!

11:34:59 MR. MOXON: Taking his life?

11:35:00 AGP: No.

11:35:03 MR. MOXON: Does Orange have a girlfriend?

11:35:06 AGP: I don't know.

11:35:08 MR. MOXON: Have you ever seen him with her? A girl, a date?

11:35:13 AGP: On a date?

11:35:13 MR. MOXON: Yeah.

11:35:14 AGP: No.

11:35:17 MR. MOXON: What's your relationship with Orange?

11:35:20 AGP: He's a fellow protester.

11:35:22 MR. MOXON: Any other relationship?

11:35:24 AGP: No.

11:35:26 MR. MOXON: Have you ever been to his RV?

11:35:28 AGP: No.

11:35:29 MR. MOXON: Has he ever been to your home?

11:35:30 AGP: Yes.

11:35:32 MR. MOXON: When?

11:35:35 AGP: Uh, the last time was July 31st, I believe.

11:35:41 MR. MOXON: After the incident at L. Ron Hubbard Way, you both went to your home?

11:35:45 AGP: Uh, yes.

11:35:46 MR. MOXON: Did he help you to edit the videos that you put on the internet?

11:35:51 AGP: No, I edit them myself.

11:35:58 MR. MOXON: Did AnonOrange seem to, uh, enjoy that incident of the, uh, what you call it, "Scientology Protesters Interrupt Horse-Based IAS Ceremony"?

11:36:08 AGP: Yes.

11:36:12 MR. MOXON: Did -- Did you feel it was a successful raid?

11:36:16 AGP: Yes.

11:36:17 MR. MOXON: Did he feel it was a successful raid?

11:36:19 AGP: Yes.

11:36:31 MR. BERRY: [whispering to Angry Gay Pope] Watch him go.

11:36:33 MR. MOXON: Did it -- Did it matter to you that the, uh, Church's ceremony, IAS ceremony, was broken up?

11:36:43 AGP: Yes.

11:36:45 MR. MOXON: How so?

11:36:48 AGP: Because it was a pep rally, not a ceremony. And we wanted to let those people know what's going on. It was a very educational moment for them if they didn't that David Miscavige beats his staff. It was all an attempt to educate them. And to demonstrate to them that they are not dauntless and defiant.

11:37:09 MR. MOXON: You wanted them to know that they are not doubtless -- dauntless and they are not defiant because they --

11:37:13 AGP: Of their behavior.

11:37:13 MR. MOXON: -- because they ran away when you yelled at them?

11:37:17 AGP: They could have debated.

11:37:31 MR. MOXON: Sometimes when you, uh, [clears his throat] go to L. Ron Hubbard Way, you approach Scientologists, correct?

11:37:42 AGP: Yes.

11:37:42 MR. MOXON: I mean, in fact, that's your modus operandi, is to approach Scientologists that you see on L. Ron Hubbard Way, correct?

11:37:50 AGP: Not necessarily.

11:37:53 MR. MOXON: And they generally try to avoid you, don't they?

11:37:55 AGP: If you watch the end of that video, people walked right past me and I didn't say anything to them. Right. There were several c-- people I did that. If I was -- If -- If-- If it were -- If my behavior was what you're describing, then I would be talking to every single person.

11:38:08 MR. MOXON: Okay. As a general rule, the Scientologists on L. Ron Hubbard Way or other churches of Scientology, uh, seek to avoid you, correct?

11:38:19 MR. BERRY: Objection. Calls for speculation.

11:38:22 AGP: Each Scientologist is different. That's not correct.

11:38:27 MR. MOXON: As a general rule, they seek to avoid you, right?

11:38:29 MR. BERRY: Objection. Calls for speculation.

11:38:32 MR. MOXON: Get away from you.

11:38:33 AGP: Uh --

11:38:33 MR. BERRY: Same objection.

11:38:35 AGP: Your bicycle guards are Scientologists, correct?

11:38:38 MR. MOXON: Can you answer my question?

11:38:39 AGP: Your bicycle guards don't try to get away from me and they are Scientologists. As a general rule, they try and follow me.

11:38:45 MR. MOXON: Okay. Other than the guards. The parishioners of the Church.

11:38:48 AGP: Uh-huh.

11:38:48 MR. MOXON: They try to get away from you, don't they?

11:38:50 AGP: Well, your handlers are parishioners and your handlers follow me everywhere. So you've got guards following me, you've got handlers following me. You know, they are Scientologists. So it's very complex behavior. Scientologists are very complex.

11:39:13 MR. MOXON: Did you ever chalk -- talk to Orange about, uh, whether or not there are services ongoing inside the churches of Scientology where you're performing these raids?

11:39:25 AGP: No.

11:39:29 MR. MOXON: Does Orange think it's funny that Scientologists run away when you yell at them?

11:39:36 AGP: I don't know.

11:39:37 MR. MOXON: Has he expressed to you that it's funny? Have you seen him laughing about it?

11:39:42 AGP: He has expressed both laughter and sadness.

11:39:47 MR. MOXON: Sadness and laughter that they run away from him?

11:39:50 AGP: Laughter that they are acting like children, sad that they act like children.

11:39:55 MR. MOXON: When they run away from him. Yes?

11:39:57 AGP: Or-- Or when they act like children in multiple situations, but running away is -- like at Twin Peaks, the RTC --

11:40:05 MR. MOXON: So [INAUDIBLE]

11:40:05 AGP: -- at Twin Peaks.

11:40:06 MR. MOXON: -- the answer is yes or no? Lemme give you the question again.

11:40:10 AGP: Okay.

11:40:10 MR. MOXON: We don't need a stream of consciousness, --

11:40:12 AGP: Mm-hmm.

11:40:12 MR. MOXON: Angry Gay Pope.

11:40:13 AGP: Okay.

11:40:13 MR. MOXON: And the only reason I'm here is because I have some specific questions for you. If you answer my questions, we'll be done quickly. If you don't, it could take several days.

11:40:21 AGP: Mm-hmm.

11:40:21 MR. MOXON: All right?

11:40:23 AGP: [nods]

11:40:24 MR. MOXON: Does AnonOrange expressed that he is happy or amused when Scientologists run away from him?

11:40:38 AGP: Yes.

11:40:44 MR. MOXON: Has Orange ever told you that, uh, he felt someone was gonna punch him? At any time? Any -- Any Scientologist or any guard of -- at a Church of Scientology?

11:40:55 AGP: No. Was going to?

11:40:58 MR. MOXON: Yeah.

11:40:58 AGP: No.

11:40:59 MR. MOXON: Did he -- Has he ever had any concern about being punched by a guard or Scientologist?

11:41:05 AGP: He didn't have a concern, he WAS punched by guards.

11:41:08 MR. MOXON: Did you answer my question? Please.

11:41:10 AGP: He never said anything to me about being concerned that that would happen. It did happen.

11:40:16 MR. MOXON: Did he ever express any concern to you after it happened?

11:41:18 AGP: Yes.

11:41:21 MR. MOXON: And he often approaches guards and kind of baits them, doesn't he? Have you seen him do that?

11:41:28 AGP: Baits them to punch him?

11:41:29 MR. MOXON: No, just baits them -- baits them generally, get -- tries to get a rise out of them.

11:41:33 AGP: That's enturbulation.

11:41:35 MR. MOXON: So that's what he does, try to enturbulate the guards?

11:41:37 AGP: Yes, he's enturbulating the guards.

11:41:39 MR. MOXON: And that's what -- You do the same thing, right?

11:41:42 AGP: I want them to be not at cause over life.

11:41:46 MR. MOXON: You want them to be enturbulated?

11:41:47 AGP: I want them to be enturbulated.

11:41:54 [loud snapping sound]

11:41:55 AGP: What keeps making that noise? Mm.

11:42:01 MR. MOXON: Did Orange, uh, [clears his throat] Well, after the incident in October of 2008, when Orange was arrested, did he, uh, ever express to you that he was glad that happened?

11:42:18 AGP: No!

11:42:19 MR. MOXON: Did he say, "Now -- Now I've got 'em" or something like that? "Now I've got 'em in a good position."

11:42:24 AGP: No.

11:42:27 MR. MOXON: Did you ever talk to him about whether or not he should sue? Over that incident?

11:42:34 AGP: I don't recall. For the most part, we were m-- concerned because he had been charged by the police.

11:42:39 MR. MOXON: Mm.

11:42:41 AGP: For a long while, that was our only concern. Until charges were dropped.

11:42:47 MR. MOXON: Then did you talk to him about filing a lawsuit?

11:42:51 AGP: Yes.

11:42:51 MR. MOXON: He did.

11:42:52 AGP: Mm-hmm.

11:42:53 MR. MOXON: Yes?

11:42:54 AGP: Yes.

11:42:56 MR. MOXON: You suggested to him that would be a good idea to get back at Scientology?

11:43:01 AGP: Not to get back at Scientology, to get justice.

11:43:09 MR. MOXON: He told you he was hoping something like that would happen?

11:43:14 AGP: Hoping something like what would happen?

11:43:16 MR. MOXON: Like that he would be arrested so he'd have a claim he could bring.

11:43:19 AGP: No. -- No.

11:43:38 MR. MOXON: [whispering offside] Can I have a [INAUDIBLE]?

11:43:43 MR. MOXON: On July 31st, 2010, prior to the disruption of the IAS ceremony and --

11:43:53 AGP: Horse-based ceremony.

11:43:56 MR. MOXON: All right. [whispering aside] Okay. [to Angry Gay Pope] -- in Los Angeles, you and Orange were at the Church of Scientology in Pasadena, correct?

11:44:05 AGP: Yes, the ideal org at Pasadena.

11:44:09 MR. MOXON: The two of you were posing as tourists? Is that right?

11:44:15 AGP: Yes.

11:44:20 MR. MOXON: You went into the church in Pasadena, uh, and pretended you were interested in Scientology?

11:44:25 AGP: Yes.

11:44:32 MR. MOXON: You knew that, if people knew who -- who you were, that you saw though they -- wouldn't let you in, right?

11:44:39 AGP: Yes.

11:44:44 MR. MOXON: During the, uh, during the incident in Pasadena -- Well, let me -- Let me play a -- a, uh, a composite of the DVD. You -- You put three videos up on your, uh, website, didn't you, concerning this incident?

11:44:59 [sound of video]

11:44:59 MR. MOXON: Just a minute. [clears his throat] During this incident on July 31st in Pasadena --

11:45:03 AGP: Yes.

11:45:06 [camera swivels toward the mural screen]

11:45:06 AGP: Oh no, point the camera at me!

11:45:12 [Video begins and is paused.]

11:45:14 MR. MOXON: I'm going to play a composite of these three, just some selected portions --

11:45:22 AGP: Oh, uh-huh.

11:45:22 MR. MOXON: -- that I put together. If you could please watch them and identify. This is video that you took. Okay?

11:45:30 MR. BERRY: This is video that YOU edited, is it, counsel?

11:45:34 MR. MOXON: That's correct, from his three --

11:45:36 MR. BERRY: But you personally edited it.

11:45:37 MR. MOXON: That's corr-- Well, no, I had it edited my m-- office.

11:45:42 [PLAYS VIDEO]

11:47:21 MR. BERRY: [while video is playing] Is there a question pending or something, counsel?

11:47:28 AGP: [while video is playing] I AM familiar with the content of the video already.

11:47:33 MR. MOXON: [while video is playing] Okay, stop it for a moment.

11:47:41 MR. MOXON: This video that you, uh, posted on angrygaypope.com is a compilation of video taken by both you and AnonOrange?

11:47:53 AGP: Yes.

11:47:54 MR. MOXON: Did he give you his video and you put them together?

11:47:58 AGP: Yes. Remember earlier when I said that the last time he was at my house was July 31st?

11:48:03 MR. MOXON: Yes.

11:48:04 AGP: Uh, he was there because he came inside to copy his camera chip into my computer. And then I took all the footage and combined it.

11:48:11 MR. MOXON: So you have the entirety of -- of the footage that he took that day?

11:48:16 AGP: Uh, yes.

11:48:17 MR. MOXON: Do you still possess it?

11:48:19 AGP: Yes, I do.

11:48:23 MR. MOXON: Uh, that should've been produced to us, Mr. Berry. Will you produce that -- all that footage to us?

11:48:28 AGP: No, I'm not. I've already given you twenty-seven gigs.

11:48:37 MR. BERRY: [whispering to Angry Gay Pope] This is afterwards.

11:48:38 AGP: Hmm. [to Mr. Moxon] July 31st, that was, like, after I had been deposed.

11:48:44 MR. BERRY: Yeah, we'll produce that, assuming that the -- I think your current --
[sound of papers being shuffled] September 2.

11:49:01 MR. MOXON: The deposition was re-noticed.

11:49:05 MR. BERRY: Yes, but with no further notice to produce for the documents.

11:49:08 MR. MOXON: No, that's not true. We had a -- There was correspondence indicating that,
if he's produced all records responsive to it, then you don't need to produce any more of the other
records --

11:49:18 MR. BERRY: Responsive --

11:49:18 MR. MOXON: [INAUDIBLE]

11:49:18 MR. BERRY: -- to the previous --

11:49:20 AGP: Yes.

11:49:20 MR. BERRY: -- request.

11:49:21 MR. MOXON: Okay, I -- I'll --

11:49:23 MR. BERRY: But, uh --

11:49:23 MR. MOXON: I'll get another subpoena then and subpoena him --

11:49:25 MR. BERRY: Well, no, no, no --

11:49:25 MR. MOXON: -- for next week, if you want to do that.

11:49:27 MR. BERRY: We are willing clar-- to clarify. This video was created subsequent to the
previous demand. Even though there's no current demand covering it, we will produce it
voluntarily.

11:49:45 MR. MOXON: Okay. Well, thank you, I appreciate that. I dispute that it's not currently
demanded, but if you'll produce all the video that you took during July 31st at Pasadena and at L.
Ron Hubbard Way, and all the video in your possession that AnonOrange took at Pasadena and L.
Ron Hubbard Way.

11:50:06 AGP: What about the Religious Technology Center?

11:50:09 MR. MOXON: On July 31st?

11:50:10 AGP: Yes.

11:50:12 MR. MOXON: Okay, that too. So you'll produce all that?

11:50:18 MR. BERRY: All the July 31 Scientology-related footage, wherever it was taken.

11:50:23 MR. MOXON: Both taken by Angry Gay Pope and AnonOrange.

11:50:27 MR. BERRY: That's in Angry Gay Pope's custody.

11:50:29 AGP: Yes, that I have.

11:50:30 MR. MOXON: All right.

11:50:31 AGP: Most of which is already online.

11:50:42 MR. MOXON: Okay, so you went back to your house after, uh, the incidents on July 31st. AnonOrange gave you the chips out of his camera and you created some videos to post online, right?

11:50:58 AGP: Yes. AnonOrange gave me his memory chip and I copied it into my computer. And then I edited it.

11:51:04 MR. MOXON: [clears his throat] Do you know how many minutes were on his -- memory chip?

11:51:08 AGP: Oh, no. I don't remember.

11:51:11 MR. MOXON: Roughly?

11:51:12 AGP: I -- I couldn't even guess.

11:51:15 MR. MOXON: Now, when you went into Pasadena, uh, you were whispering when you first went in. Why were you whispering?

11:51:25 AGP: We were whispering because we were talking to each other and we didn't want anyone else to hear.

11:51:30 MR. MOXON: Didn't want anyone else to know that you were there under some other pretense?

11:51:36 AGP: Yes.

11:51:39 MR. MOXON: And the -- A couple of times, I can play further for you --

11:51:44 AGP: Sure.

11:51:44 MR. MOXON: -- if you like.

11:51:44 AGP: Sure.

11:51:45 MR. MOXON: But you, uh, you asked someone if you could take some photographs and you clicked and made a photograph, for example, of L. Ron Hubbard's office. Do you remember that?

11:51:53 AGP: Oh, yes.

11:51:55 MR. MOXON: Why did you ask her if you could take a picture of L. Ron Hubbard's office when you were already filming it?

11:52:00 AGP: Because I wanted to verify with her that indoor photography was allowed. Mm.

11:52:05 MR. MOXON: And up at that point -- Up to that point, she would have been under the understanding that you weren't taking any pictures, right?

11:52:12 AGP: Yes, she would have -- She would have thought we were not taking pictures.

11:52:18 MR. MOXON: There were several other men that were being filmed, in fact a number of people that were being filmed inside. Did you tell any of them you were filming them?

11:52:28 AGP: No.

11:52:34 MR. MOXON: Let's play the rest of this. Just a few more minutes.

11:52:39 MR. BERRY: Is there a question pending, counsel?

11:52:41 MR. MOXON: I'm going to ask him some questions based on this.

11:52:44 [PLAYS VIDEO]

11:53:51 MR. MOXON: [while video is playing] Stop the video a moment, please. Stop it for a moment, please.

11:54:01 MAN'S VOICE: [whispering] [INAUDIBLE]

11:54:03 MAN'S VOICE: [whispering] Yeah. Yeah.

11:54:07 MR. MOXON: [clears his throat] There're a number of staff members that were gathering or were having a discussion. Was that video taken by you or AnonOrange?

11:54:14 AGP: That was mine.

11:54:17 MR. MOXON: You didn't tell any of those people you were, uh, videoing their discussions, were you?

11:54:23 AGP: No.

11:54:25 MAN'S VOICE: [INAUDIBLE]

11:54:30 MR. MOXON: Continue. Oh. Uh. Yeah.

11:54:33 MAN'S VOICE: Please.

11:54:34 MAN'S VOICE: [whispering] Sorry.

11:54:36 [PLAYS VIDEO]

11:55:23 MR. MOXON: [while video is playing] Stop the video a moment.

11:55:25 [video stopped]

11:54:27 MR. MOXON: Uh, you just told the, uh, the lady that you were speaking to in this video, the Italian girl, that you just hap--

11:55:33 AGP: Oh, she was Italian.

11:55:34 MR. MOXON: -- you just happened to be walking, uh, down Colorado Boulevard and you happened to see this building. And that was not true, was it?

11:55:42 AGP: No, that was a lie.

11:55:45 MR. MOXON: Had you and AnonOrange planned to go to the, uh, Pasadena church?

11:55:48 AGP: Yes.

11:55:50 MR. MOXON: How did you -- How did you -- do that plan? How did you communicate, orally or did you do it in -- by email?

11:55:57 AGP: Probably both. Uh, he asked me if I wanted to raid that day and I said yes. And we thought about what to do and one of the things on our list was the Pasadena ideal org.

11:56:15 MR. MOXON: [exhales] Continue.

11:56:17 [PLAYS VIDEO]

11:56:16 MR. BERRY: [whispering to Angry Gay Pope while video is playing] Don't [INAUDIBLE], just -- You keep putting your foot in your mouth. It's a lie. [INAUDIBLE]

11:57:58 MR. MOXON: [while video is playing] Stop the video a moment.

11:58:00 [video stopped]

11:58:02 MR. MOXON: Now, one of the things we just saw here in this video at Pasadena is AnonOrange and the way he's dressed, with sunglasses and kind of a Australian hat or something, and -- and in shorts. Where -- Were you trying to dress as tourists? To look like tourists?

11:58:22 AGP: No, we were trying to dress in a way that would hide his face and hair.

11:58:27 MR. MOXON: I see. So that no one would recognize him?

11:58:30 AGP: Yes.

11:58:31 MR. MOXON: Okay, continue.

11:58:33 [PLAYS VIDEO]

11:59:08 MR. MOXON: [while video is playing] Stop the video a moment.

11:59:10 [video stopped]

11:59:11 MR. MOXON: Uh, what we've just seen in the video is you and AnonOrange talking to a man about Scientology, about Scientology practice, correct?

11:59:22 AGP: Yes.

11:59:23 MR. MOXON: And, uh, for the purposes of the video, it's a man who looks like he's, I don't know, in his fifties, perhaps, and you superimposed on it, "Yet he has no grey hair."

11:59:32 AGP: Yes.

11:59:33 MR. MOXON: Uh, was this man informed that he was being recorded?

11:59:37 AGP: No.

11:59:38 MR. MOXON: Okay, continue.

11:59:41 [PLAYS VIDEO]

11:59:49 MR. MOXON: [while video is playing] Stop the video a moment.

11:59:51 [video stopped]

11:59:52 MR. MOXON: You superimposed on the screen, "Workers are being sent upstairs." Correct?

11:59:59 AGP: Yes.

11:59:59 MR. MOXON: Why did you do that?

12:00:00 AGP: Because I saw them all going upstairs.

12:00:04 MR. MOXON: You thought at that point you had been, uh, discovered? Or possibly had been discovered?

12:00:09 AGP: I was curious the minute, uh, the Italian lady was pulled away.

12:00:15 MR. MOXON: Suspicious?

12:00:18 AGP: Yes.

12:00:18 MR. MOXON: So you thought perhaps you had been discovered?

12:00:21 AGP: Yes.

12:00:24 MR. MOXON: Is the -- the video that we're seeing right now -- is that taken by you or Orange -- of this -- the man describing Scientology, just after you believe you were discovered?

12:00:34 AGP: Could you just go back a little bit and pl-- play just, like, ten seconds?

12:00:52 [PLAYS VIDEO]

12:01:08 AGP: [while video is playing] That's mine.

12:01:10 [video stopped]

12:01:11 AGP: The other shot was AnonOrange's.

12:01:14 MR. MOXON: So you're going back and forth between his view and your view.

12:01:18 AGP: Yes.

12:01:21 MR. MOXON: Okay, continue.

12:01:23 [PLAYS VIDEO]

12:01:56 MR. MOXON: [while video is playing] Stop the video a moment.

12:01:57 [video stopped]

12:01:58 MR. MOXON: Now, you've superimposed on the screen as we're watching the words, "Security is coming."

12:02:05 AGP: Yes.

12:02:06 MR. MOXON: Why did you do that?

12:02:08 AGP: Because, within a moment or two, security arrives. And I wanted to alert the viewer ahead of time.

12:02:15 MR. MOXON: Uh, did you -- Did you perceive that security was coming?

12:02:17 AGP: No. No.

12:02:18 MR. MOXON: This is post hoc?

12:02:20 AGP: Yes.

12:02:21 MR. MOXON: All right. Continue?

12:02:23 [PLAYS VIDEO]

12:03:17 AGP: [while video is playing] growth

12:03:18 MR. MOXON: [while video is playing] Stop it for a moment.

12:03:19 AGP: [while video is playing] Scientology

12:03:20 [video stopped]

12:03:23 MR. MOXON: Now, you and AnonOrange were both basically screaming inside the church after you were discovered?

12:03:28 AGP: Yes.

12:03:30 MR. MOXON: Was that planned or was that a spontaneous act by you?

12:03:35 AGP: It was planned.

12:03:37 MR. MOXON: Between you and AnonOrange?

12:03:39 AGP: Yes.

12:03:40 MR. MOXON: How so? How was that planned?

12:03:42 AGP: He didn't want to go in, but I said, "Let's go in. And if we're discovered, we should yell pro-LRH things."

12:03:57 MR. MOXON: So you planned in advance to do this yelling.

12:04:00 AGP: Only if we were discovered.

12:04:06 MR. MOXON: Did you intend for people inside to hear you?

12:04:09 AGP: Yes.

12:04:12 MR. MOXON: Is that why you were yelling so loudly?

12:04:14 AGP: Yes.

12:04:16 MR. MOXON: Is that why Orange was yelling so loudly?

12:04:18 AGP: Yes.

12:04:21 MR. MOXON: Did you care if you disrupted, uh, activities within the church?

12:04:25 AGP: We saw no activities.

12:04:28 MR. MOXON: Did you care if you disrupted activities within the church?

12:04:34 AGP: No.

12:04:39 MR. BERRY: Counsel, when are we --

12:04:39 MR. MOXON: When did you --

12:04:40 MR. BERRY: Counsel --

12:00:40 MR. MOXON: -- plan --

12:04:40 MR. BERRY: When are we going to get to something to do with the Orange case, instead of something that happened two years later, which we're dealing with now?

12:04:46 MR. MOXON: When did --

12:04:46 MR. BERRY: And have dealt with most of the morning.

12:04:48 MR. MOXON: When did you plan this raid? The July 31st raid.

12:04:54 AGP: We planned the July 31st raid on July 31st, 2010.

12:04:58 MR. MOXON: That morning.

12:04:59 AGP: Yes.

12:05:03 MR. MOXON: Do you still have the emails between yourself and, uh, AnonOrange?

12:05:07 AGP: No, they've been deleted.

12:05:09 MR. MOXON: Why?

12:05:10 AGP: Because I always delete all my emails. I don't back anything up.

12:05:18 MR. MOXON: You said in the video that, uh, you were raised Catholic.

12:05:22 AGP: Correct.

12:05:23 MR. MOXON: Is that right? I assume you're not a practicing Catholic now.

12:05:26 AGP: No.

12:05:27 MR. MOXON: In fact, do you also -- Do you harass members of Catholic church at their church sometime?

12:05:33 AGP: I've never harassed any Catholic church. I've protested.

12:05:40 MR. MOXON: Do you hate all religion or just Catholicism and Scientology?

12:05:44 MR. BERRY: Objection. Lacks foundation.

12:05:45 AGP: Hate? [shakes his head]

12:05:46 MR. MOXON: Sorry?

12:05:47 AGP: So you're trying to put the word "hate" in my mouth. Yes. Yes, you are. I think that all religions are equal and I don't believe any of them.

12:06:09 MR. MOXON: Later on, uh, after this incident, you were yelling at the doors to a cr-- Well, let's play a little more.

12:06:17 [PLAYS VIDEO]

12:07:02 MR. MOXON: [while video is playing] Stop a second.

12:07:03 [video stopped]

12:07:05 MR. MOXON: You, uh, yell in the video as you're -- you're screaming at the front door. The front door is open. "You people are too stupid to close the door." Why did you do -- say that?

12:07:17 AGP: Because I felt that they should shut the door when there's a protest outside, and they didn't seem to understand that. You were not at cause over MEST.

12:07:26 MR. MOXON: And you superimposed on the screen, "I want them to shut the door." Correct?

12:07:29 AGP: Yes.

12:07:29 MR. MOXON: Why do you want them to shut the door?

12:07:31 AGP: Because it would make it even less likely for people to go inside if the door is closed.

12:07:36 MR. MOXON: Okay, continue.

12:07:37 MR. BERRY: Counsel, it's nearly an hour and a half since this deposition started.

12:07:40 [PLAYS VIDEO]

12:07:40 MR. BERRY: [while video is playing] There hasn't been a single question about --

12:07:43 AGP: [while video is playing] Gold Base.

12:07:43 MR. BERRY: [while video is playing] -- the Orange case

12:07:44 AGP: [while video is playing] Mm-hmm.

12:07:44 MR. BERRY: [while video is playing] If nothing is asked before the lunch break, we will not be returning this afternoon.

12:08:56 MR. MOXON: [while video is playing] Stop the video.

12:08:57 [video stopped]

12:08:58 MR. MOXON: Now, we just saw another portion of this, uh, day in Pasadena --

12:09:02 AGP: Yes.

12:09:02 MR. MOXON: July 31st, when there were a number of staff members sitting at a table at the side entrance, correct?

12:09:09 AGP: Yes.

12:09:09 MR. MOXON: And you and AnonOrange were yelling at them?

12:09:12 AGP: Yes.

12:09:13 MR. MOXON: They -- stop what they were doing, they stop their gathering, ga-- all gathered up, went inside and closed the door, right?

12:09:21 AGP: Yes.

12:09:22 MR. MOXON: Was that your intention, to have them do that?

12:09:24 AGP: Yes.

12:09:27 MR. MOXON: When you were yelling at that side door, was it your intention for people inside the church to hear you?

12:09:32 AGP: Yes.

12:09:35 MR. MOXON: Okay. Did AnonOrange tell you why he wanted to go to the Pasadena church that day?

12:09:49 AGP: No, he didn't say why he wanted to go.

12:09:14 MR. MOXON: That video that we were just playing was marked as Exhibit Number Thirty-Six in the Orange deposition and, as you've indicated, it was you that put that video, those videos, up on, uh, the internet, correct?

12:10:30 AGP: Yes.

12:10:31 MR. MOXON: All right. I'm going to show you what was marked in the Orange deposition as Exhibit Number Thirty-One. It's a, uh -- [hands a sheet to Angry Gay Pope] Do you recognize that photograph?

12:10:44 AGP: Yes.

12:10:45 MR. MOXON: That's a photograph of AnonOrange wearing fishnet stockings and holding a sign saying, "I am a Scientologist."

12:10:52 AGP: Yes.

12:10:54 MR. MOXON: Were you with him that day?

12:10:56 AGP: Yes.

12:10:56 MR. MOXON: Did you take that photograph?

12:10:59 AGP: I don't think so.

12:11:01 MR. MOXON: Did you take --

12:11:01 AGP: I could be wrong.

12:11:02 MR. MOXON: Did you take any video or photographs that day?

12:11:06 AGP: Uuh, that was our Hemet raid, yes.

12:11:11 MR. MOXON: I didn't see any of those produced in what you gave us. Did you delete that -- material?

12:11:17 AGP: That would've been in the same raid from Gold Base as, uh -- He was not allowed to go to Gold Base and I may not have taken footage of the Hemet raid. I remember being there, but I don't remember recording anything.

12:11:32 MR. MOXON: Do you know --

12:11:32 AGP: I will --

12:11:32 MR. MOXON: -- why ---

12:11:32 AGP: -- dou -- I'll double-check and see if I have that. Do you know what date this was?

12:11:38 MR. MOXON: Uh, offhand, I don't.

12:10:39 AGP: Hm.

12:10:40 MR. MOXON: But I have a listing of the -- of the videos that you produced. We have the, uh, the whole list. You can look at it --

12:11:49 AGP: What I really need --

12:11:49 MR. MOXON: -- over the lunch break if you like.

12:11:51 AGP: What I really need is the date that this was taken and I can go home and check.

12:11:54 MR. MOXON: Okay. Do you know why AnonOrange was dressed that way?

12:11:58 AGP: Yes.

12:11:59 MR. MOXON: Why?

12:12:00 AGP: He wanted Scien-- He wanted deliberately look stupid and tell people he was a Scientologist, therefore implying that Scientologists are stupid.

12:12:07 MR. MOXON: So basically, repulse people against Scientology?

12:12:10 AGP: Yes.

12:12:11 MR. MOXON: Was this -- This -- Was -- This was one of the days you and AnonOrange were at Golden Era?

12:12:18 AGP: No. I believe he was banned from there.

12:12:21 MR. MOXON: So it was after he was banned from Golden Era?

12:12:24 AGP: Yes. That's why it's in Hemet, not Golden Era.

12:12:26 MR. MOXON: So it was after the criminal case was filed.

12:12:28 AGP: I can't remember. I -- I would assume so.

12:12:49 MR. MOXON: Were you with AnonOrange any of the times at Golden Era when he was warned by the police to stay off the property?

12:13:01 AGP: There was one incident, uh, when the CHiPs were patrolling.

12:13:09 MR. MOXON: Highway Patrol?

12:13:10 AGP: Yes. California Highway Patrol.

12:13:14 MR. MOXON: Was that September 20th --

12:13:16 AGP: I can't remember --

12:13:17 MR. MOXON: 2008?

12:13:17 AGP: -- the date. I can't remember the date, but it was 2008.

12:13:20 MR. MOXON: Okay. You were with AnonOrange at Golden Era and some Highway Patrol approached you?

12:13:26 AGP: Yes.

12:13:28 MR. MOXON: Uh, approximately when was that, do you know?

12:13:31 AGP: It was in mid-afternoon.

12:13:33 MR. MOXON: Of what month? What year?

12:13:35 AGP: Oh. It was 2008, uh, before he was attacked, uh, so it must have been before October.

12:13:44 MR. MOXON: What happened?

12:13:45 AGP: Uh, we were protesting there and there was no local police and, for some reason, the California Highway Patrol was babysitting us.

12:13:55 MR. MOXON: Where were you located when you were approached by the Highway Patrol?

12:13:58 AGP: I was walking up and down on the berm of the road.

12:14:03 MR. MOXON: Um, north side or south side?

12:14:05 AGP: Both.

12:14:07 MR. MOXON: You were with AnonOrange?

12:14:09 AGP: Uh, we weren't side by side. I was there at the same time.

12:14:13 MR. MOXON: Did the Highway Patrol stop you and talk to you?

12:14:16 AGP: Yes.

12:14:17 MR. MOXON: What did they say?

12:14:19 AGP: They made a lot of threats that they were going to arrest me for not walking correctly, for not walking on the right side of the street, for walking on the curb, or for walking on the road. For, essentially, just being there. But they didn't, because that would've been illegal.

12:14:35 MR. MOXON: Did they tell you where the Golden Era property was and to stay off the property?

12:14:39 AGP: They didn't seem to know anything about the easements.

12:14:42 MR. MOXON: Did they tell you to stay off the Golden Era property?

12:14:45 AGP: Yes.

12:14:48 MR. MOXON: Did Mr. -- Was AnonOrange there when they told you to stay off the Golden Era property?

12:14:53 AGP: They told us that, but we weren't ever on their property.

12:14:57 MR. MOXON: Okay, but they -- but AnonOrange heard them say that?

12:15:00 AGP: Yes and we never went on the property.

12:15:03 MR. MOXON: So you stayed off the Golden Era property because they told you you'd be arrested if you went on the property?

12:15:08 AGP: No, they didn't threaten us with arrest, --

12:15:11 MR. MOXON: Did they --

12:15:11 AGP: -- but they th-- they threatened us -- uh, they threatened me with arrest for not -- or tick-- they threatened me with being ticketed for not walking on the correct side of the road, uh, when I was walking up the hill.

12:15:27 MR. MOXON: Did they tell you -- suggest to you that it was illegal to trespass on the Golden Era property?

12:15:34 AGP: They told me not to step onto the -- They told me always walk in the road, which is dangerous.

12:15:40 MR. MOXON: You did not go on the property.

12:15:43 AGP: Yes.

12:15:45 MR. MOXON: And where were the-- where were you and AnonOrange when they told you that?

12:15:49 AGP: Right at the side of the road, well within the easement.

12:15:52 MR. MOXON: Did you talk to AnonOrange about that afterwards?

12:15:55 AGP: No, he -- I saw that he was being -- Well, actually, I did. I said, "What were you talking to the police about?" and he said that they were giving him jaywalking issues, and so I put that photograph on my website. [motions with hand to simulate a caption] "Jaywalking issues".

12:16:05 MR. MOXON: But did you talk to him about the issue of not walking on Golden Era property?

12:16:09 AGP: No.

12:16:11 MR. MOXON: Did -- Do you know if he disagreed with whether or not he was on Golden Era property?

12:16:18 AGP: No.

12:16:19 MR. MOXON: Okay. We'll take a lunch break now. We'll, uh, off the record.

12:16:24 THE VIDEOGRAPHER: The time is 12:16 P.M. We are off the record.

12:16:27 MR. MOXON: How much time –

13:27:58 [WOMAN'S VOICE]: Yes, I understand. I'm talking about the fashion now. Do you intend to go into churches or missions of Scientology and yell to people to get your point across?

13:32:46 WOMAN'S VOICE: [INAUDIBLE]

14:03:20 WOMAN'S VOICE: I'm sorry, what was that?

14:29:18 MAN'S VOICE: [INAUDIBLE]

14:31:43 WOMAN'S VOICE: I'm sorry, say it again.

14:33:19 MAN'S VOICE: [INAUDIBLE]

14:33:36 MAN'S VOICE: [INAUDIBLE]

14:33:39 MAN'S VOICE: [INAUDIBLE]

14:43:53 MAN'S VOICE: Oops.

13:03:44 THE VIDEOGRAPHER: The time is 1:03 P.M. We are on the record.

13:03:47 MR. BERRY: Before we proceed, I think the witness had a clarification to make --

13:03:50 AGP: A brief clarification. Uh, Mr. Moxon, you asked me, uh, what I did for a living and I told you, uh, my main job is as a freelance, uh, movie animator, uh, but my other job is as a citizen-journalist, uh, exposing and exploring Scientology, and if people want to make donations to me, then they do. So that is my other role. So please continue.

13:04:18 MR. MOXON: [clears his throat] Have people paid you for this, uh, purported citizen journalism?

13:04:28 AGP: There is a donation link on my website and mostly ex-Scientologists make donations via PayPal.

13:04:35 MR. MOXON: So people have -- You're -- Are you claiming you're, uh performing some journalistic job that people pay you for? Is that what you're saying?

13:04:44 AGP: Uh, yes, I don't expect to get paid, but if someone donates, --

13:04:49 MR. MOXON: Who --

13:04:49 AGP: -- it's helpful.

13:04:49 MR. MOXON: Who's -- Who's paid you to do this? [QUES]

13:04:51 AGP: I'm not gonna say that.

13:04:58 AGP: I mean, really.

13:04:59 MR. MOXON: I mean, really, give me an answer or --

13:05:01 AGP: No, I will not --

13:05:01 MR. MOXON: -- refuse to answer.

13:05:02 AGP: I -- I refuse to answer any questions about who my donors are.

13:05:06 MR. MOXON: So these are -- You're claiming people are giving you donations. They're not paying you to -- You're not a journalist. People give you donations to harass Scientologists?

13:05:15 AGP: I'm a journalist.

13:05:16 MR. MOXON: [clears his throat] Oh, and who pays you --

13:05:17 AGP: I'm a citizen journalist.

13:05:19 MR. MOXON: Who pays you to do that?

13:05:21 AGP: People who donate to my website.

13:05:22 MR. MOXON: Who?

13:05:23 AGP: I'm not going to tell you. That's -- That is privileged information, --

13:05:28 MR. MOXON: That's not --

13:05:28 AGP: -- which you will use to harass people.

13:05:30 MR. MOXON: That's not privileged. Answer the question.

13:05:31 AGP: No, I won't.

13:05:35 AGP: What's that got to do with AnonOrange being beaten? Nothing. What's that got to do with hurting me? Everything.

13:05:43 MR. MOXON: Well, apparently, it's to set up some sort of defense that you work -- cooked up with Mr. Berry, so I want to find out if you're claiming you're a journalist and tell me who pays you. If you refuse to tell me, then -- then we'll throw your defense where [INAUDIBLE].

13:05:58 AGP: I'm sorry, say that again.

13:06:00 MR. BERRY: He's clarified his previous answer. If you've got some further questions, fine. He's made it clear that he's a journalist who receives donations. He's also asserted some form of privacy objection to the source of contributions, even if they were relevant to this case. So proceed.

13:06:29 MR. MOXON: Is part of your, quote, "journalistic" work to, uh, enturbulate Scientologists?

13:06:34 AGP: Yes, educating them.

13:06:40 MR. MOXON: Is part of your, quote, "journalistic" work disrupting, uh, their ceremonies?

13:06:46 AGP: I've never disrupted a religious ceremony of Scientology.

13:06:51 MR. MOXON: Uh, because you dispute that the -- that Scientology has ceremonies?

13:06:56 AGP: Uh, I've never -- When I was at the ideal org, you had a ceremony and everyone was quiet.

13:07:04 MR. MOXON: How do you know?

13:07:06 AGP: 'cause the police told us to be quiet, and we were.

13:07:13 MR. MOXON: When you were screaming inside the, uh, Pasadena organization [clears his throat], did you care if you were disrupting, uh, services inside the building?

13:07:28 AGP: I saw no services.

13:07:29 MR. MOXON: Did you -- That's not what I asked you. Did you care if you were disrupting the services inside the building?

13:07:34 AGP: I only cared about educating the people in the building.

13:07:38 MR. MOXON: Okay.

13:07:44 MR. MOXON: You noticed when you were inside that there's an atrium that goes up to the second, third, and fourth floors, correct?

13:07:51 AGP: Yes.

13:07:53 MR. MOXON: [clears his throat] Which is right off the lobby, right?

13:07:56 AGP: Yes.

13:08:03 MR. MOXON: Did you care --

13:08:04 MR. BERRY: Mr. Moxon, --

13:08:05 MR. MOXON: Did you --

13:08:05 MR. BERRY: We have spent nearly half a day on the Pasadena org. What has that got to do with the Orange case?

13:08:12 MR. MOXON: I'm just following up on the comments you told him to make over the lunch break. [clears his throat]

13:08:17 MR. BERRY: Well, that gratuitous comment lacks foundation.

13:08:31 MR. MOXON: For the record, uh, Angry Gay Pope is drawing with sweat or spit on the table.

13:08:38 MR. BERRY: What?

13:08:38 MR. MOXON: Is it sw-- Is it sweat or spit you're drawing with?

13:08:42 AGP: I have sweaty hands.

13:08:44 MR. BERRY: Counsel --

13:08:44 AGP: It's one of the side effects of hyperactivity.

13:08:46 MR. BERRY: Counsel, I see no sweat or spit here, no moisture here, what are you trying -
-

13:08:51 AGP: Totally dry.

13:08:52 MR. BERRY: What are you trying to assert and why are you polluting this transcript?

13:08:56 MR. MOXON: Phew! The only pollution is on the table from what --

13:08:59 MR. BERRY: There is no --

13:09:00 MR. MOXON: -- Mr. --

13:09:00 MR. BERRY: -- no -- no -- not a s-- not a piece of moisture on this tabletop.

13:09:05 [Sound of Angry Gay Pope's cell phone ringtone]

13:09:06 MR. BERRY: So what are you suggesting?

13:09:06 AGP: Oh, shoot, sorry. [Angry Gay Pope shuts down his cell phone.]

13:09:08 MR. MOXON: Mr. Berry, I -- I don't -- I don't know you why you're trying misrepresent what's on the record. I stopped --

13:09:12 MR. BERRY: Well, [INAUDIBLE] --

13:09:12 MR. MOXON: -- because he was --

13:09:13 MR. BERRY: So bring the court reporter -- Bring the camera right over here and take a full shot of this tabletop then, if you're asserting that he's doing something he shouldn't be, because it is not --

13:09:21 MR. MOXON: I am --

13:09:21 MR. BERRY: -- my understand --

13:09:21 MR. MOXON: I'm asserting that he was drawing with sweat, and I asked him if it was sweat or spit, and he said it was sweat. Is that --

13:09:28 MR. BERRY: Would you --

13:09:29 MR. MOXON: Mr. Barry [phonetic spelling], let me --

13:09:30 MR. BERRY: Would you please --

13:09:30 MR. MOXON: Go ahead.

13:09:30 MR. BERRY: -- have the cameraman, or camerawoman, photograph the tabletop to see that there is absolutely nothing as you suggest on that --

13:09:36 MR. MOXON: Since you're disputing it, what were you -- what were you doing on the table there, Angry Gay Pope?

13:09:40 AGP: I was drying my hand.

13:09:43 MR. MOXON: Drying your hand on the table? Is that what you said?

13:09:47 AGP: Mm.

13:09:48 MR. MOXON: Yes?

13:09:49 AGP: Yes. Could I have a -- [reaches for a tissue] Oh, thank you so much. [dries his hands on the tissue, reaches for other tissues, and dries his hands]

13:10:19 MR. MOXON: Were you ever at any raid with Orange in Orange County when the police told you or AnonOrange to stay off Church property?

13:10:29 MR. BERRY: Objection. Asked and answered. We dealt with that this morning, counsel.

13:10:34 MR. MOXON: Answer.

13:10:36 AGP: We dealt with that this morning, counsel.

13:10:37 MR. MOXON: Answer or refuse to answer. If you refuse to answer, I'll make a motion to compel.

13:10:43 MR. BERRY: Counsel, it's already been asked and answered. You went over it just before the break.

13:10:48 AGP: It's redundant.

13:10:50 MR. MOXON: Are you instructing him not to answer my question?

13:10:52 MR. BERRY: No, but -- It's either a yes or no answer, but he's already given you a half-hour series of answers on what happened at Gold Base with the police and the berm.

13:11:02 MR. MOXON: Let -- Let me just repeat question because I don't think you're listening.

13:11:06 AGP: Mm-hmm.

13:11:08 MR. MOXON: Did you or AnonOrange, during any raid in Orange County -- Were you ever told by the police to stay off Church property?

13:11:18 AGP: In Orange County, not Riverside County?

13:11:21 MR. MOXON: That's right.

13:11:22 AGP: Uh, I -- I don't remember where Tustin is. Where's Tustin?

13:11:28 MR. MOXON: Orange County.

13:11:29 AGP: Okay. Uh, I remember raiding a couple of times at the Tustin org. I don't remember the police telling him to stay off the property.

13:11:46 MR. MOXON: How many different, um, raids that you attended at Golden Era were you told by the police to stay off Church property?

13:11:55 AGP: Uh, -- I can think of at least two.

13:12:04 MR. MOXON: And --

13:12:04 AGP: Oh no, I'm sorry, three.

13:12:06 MR. MOXON: Okay. The one you told me about this morning, was that the first?

13:12:09 AGP: The first one was CHIPS.

13:12:11 MR. MOXON: Mm-hmm.

13:12:11 AGP: Um, the second one was, uh, the pansy stomping, and the third one was the, uh, first huge raid they had there. Uh, uh, where I took the pictures of the ultrabarrier(TM). That was the first global raid at Gold Base.

13:12:26 MR. MOXON: Okay. So the one you discussed this morning, where the California Highway Patrol told you and AnonOrange to stay off the -- off the Church's property was approximately when?

13:12:36 AGP: I'm sorry, say that again.

13:12:37 MR. MOXON: When was that?

13:12:39 AGP: Oh, that was befo-- that was, like, 2008, I would say, uh, September or possibly October, uh, before, uh, the beating.

13:12:53 MR. MOXON: Okay. And the second incident when you were told by the police to stay off the Church property was approximately when?

13:13:01 AGP: Um, that was the pansy stomping -- Oh, there was one fourth episode. Uh, I -- I'm confused. It wasn't the pansy stomping. It was the one where, uh, Mark Bunker and Mark Lowell were arrested. Because Officer [David S.] Kurylowicz, I believe was his name, told us to stay off of their property. And stay off the street.

13:13:24 MR. MOXON: Okay. So let's just --

13:13:27 AGP: So there were --

13:13:27 MR. MOXON: Get these organized.

13:13:27 AGP: -- three --

13:13:29 MR. MOXON: [clears his throat] So the --

13:13:30 AGP: [INAUDIBLE]

13:13:30 MR. MOXON: There was a time when Mark Bunker and -- you say Mark Lowell?

13:13:36 AGP: He -- He goes by different names. I don't know what his real name is, Mark --

13:13:39 MR. MOXON: You're talking about --

13:13:39 AGP: -- Lowell.

13:13:40 MR. MOXON: -- Owens?

13:13:40 AGP: Mark, uh, Doug Owens.

13:13:42 MR. MOXON: [INAUDIBLE]

13:13:42 AGP: He goes by Mark Lowell and Doug Owens. Is Doug Owens his real name?

13:13:46 MR. MOXON: Yes.

13:13:46 AGP: I -- I don't know, because they're anonymous protesters and so I don't know their names. Yes, so it was CHIPS, uh, the --

13:13:54 MR. MOXON: Okay, got it. Lemme ask you a question. So the incident where you say Mark Bunker and, uh, Doug Owen was arrested, that was Golden Era?

13:14:06 AGP: Yes.

13:14:07 MR. MOXON: Were they actually arrested and taken away by the police?

13:14:10 AGP: Yes.

13:14:11 MR. MOXON: When was that?

13:14:13 AGP: [inhales and exhales] That was in, um, 2009 and that was in April, but I can't remember the exact date.

13:14:24 MR. MOXON: Was Orange there too?

13:14:26 AGP: No, he's banned from there, couldn't go there.

13:14:31 MR. MOXON: But to -- So that was -- The incident with Bunker and Owens, you're saying was after Orange was arrested?

13:14:37 AGP: Yes.

13:14:39 MR. MOXON: Okay. And then you say there was another incident which you described as the first huge raid at Golden Era?

13:14:45 AGP: Yes.

13:14:46 MR. MOXON: When was that?

13:14:47 AGP: Oh, I believe -- M-- You know, I -- Maybe that was in the Spring of two thou-- or early 2009, uh, I'm not sure of the exact date.

13:15:01 MR. MOXON: Well, if it was a big raid at Golden Era, the big raids were in 2008, weren't they?

13:15:05 AGP: It was either late 2008 or early 2009.

13:15:08 MR. MOXON: Was Orange there?

13:15:10 AGP: Uh, no. He -- He was banned, so it had to have been after, uh, the Oc-- It had to have been after October 2008.

13:15:22 MR. MOXON: And you described a, uh, pansy-stomping incident.

13:15:25 AGP: Mm-hmm.

13:15:25 MR. MOXON: Is that -- th-- th-- Is that the incident when you were, uh, arrested for vandalism?

13:15:33 AGP: Y-- I wasn't arrested. No. No, I was not arrested.

13:15:39 MR. MOXON: You were cited?

13:15:39 AGP: Yes, I was cited

13:15:40 MR. MOXON: And you were prosecuted, correct?

13:15:43 AGP: Yes.

13:15:45 MR. MOXON: For vandalism at Golden Era when you were, as you put it, stomping on flowers?

13:15:52 AGP: Yes.

13:15:52 MR. MOXON: [clears his throat] You were doing that intentionally to destroy the flower beds, the plants, right?

13:15:58 AGP: No.

13:15:59 MR. MOXON: You were intentionally stepping on individual plants, weren't you?

13:16:03 AGP: Yes.

13:16:05 MR. MOXON: Twisting your foot, trying -- basically killing those plants?

13:16:09 AGP: Yes.

13:16:10 MR. MOXON: [clears his throat] Why were you doing that?

13:16:14 AGP: Because the police refused to show up and I was forced to engage in civil disobedience to make them arrive and enforce Ordinance 884, which is of high importance to the politicians in Riverside.

13:16:27 MR. MOXON: And so you knew you were violating the law?

13:16:39 AGP: Yes.

13:16:32 MR. MOXON: Is that why you pleaded guilty to that vandalism offense?

13:16:36 AGP: No.

13:16:37 MR. MOXON: Why'd you plead guilty?

13:16:39 AGP: Because you offered me a plea bargain.

13:16:42 MR. MOXON: So rather than go to jail, you accepted the plea bargain?

13:16:46 AGP: No. I wanted to go to court.

13:16:51 MR. MOXON: [clears his throat] Do you know the difference between right and wrong?

13:16:55 AGP: Yes.

13:16:57 MR. MOXON: What is the difference?

13:16:58 AGP: The difference between right and wrong? That's a --

13:17:02 MR. BERRY: O-- Objection.

13:17:03 AGP: [laughs]

13:17:03 MR. MOXON: That's fine.

13:17:04 MR. BERRY: Objection.

13:17:04 MR. MOXON: You don't need to --

13:17:05 AGP: [laughs]

13:17:05 MR. MOXON: Lemme -- I'll withdraw the question. So why didn't you contest the criminal case against you? [QUES]

13:17:12 AGP: Uh --

13:17:12 MR. BERRY: Objection. Irrelevant.

13:17:13 AGP: Hm. Why didn't I contest it?

13:17:17 MR. MOXON: Yeah.

13:17:18 MR. BERRY: Calls for attorney-client communications. And discussions.

13:17:24 MR. MOXON: I'm excluding any communications you may have had with any, uh, attorney.

13:17:29 AGP: I fail to see how this is relevant to Orange, if he was not there.

13:17:34 MR. MOXON: Because you're a -- you're a key witness in this case and your credibility and your conduct is at issue also.

13:17:42 AGP: Mm-hmm. I'm not a key witness. I wasn't there.

13:17:48 MR. MOXON: Answer the question.

13:17:50 AGP: No.

13:17:51 MR. MOXON: [clears his throat] You refuse?

13:17:53 AGP: I refuse.

13:17:55 MR. BERRY: [clears his throat] Restate the question please.

13:17:59 MR. MOXON: Why didn't you contest the criminal case against you? [clears his throat]

13:18:04 MR. BERRY: Objection. Calls for attorney-client privileged communications.

13:18:09 MR. MOXON: Now, y-- you said that once and I told you it -- I'm excluding attorney-client privileged communications and I repeat the question. Why didn't you contest the criminal case?

13:18:18 MR. BERRY: Objection. He cannot --

13:18:22 AGP: [shakes his head]

13:18:22 MR. BERRY: -- answer the question adequately without disclosing my communications with him.

13:18:26 AGP: Correct.

13:18:37 MR. MOXON: Do you know where the Church of Scientology Mission in Melrose is?

13:18:41 AGP: Yes.

13:18:44 MR. MOXON: That's approximately Melrose and Citrus Streets in Los Angeles?

13:18:49 AGP: Approximately.

13:18:53 MR. MOXON: You've been there several times?

13:18:54 AGP: Yes.

13:18:55 MR. MOXON: You've been there with AnonOrange also, right?

13:18:57 AGP: Once.

13:18:58 MR. MOXON: [clears his throat] You and AnonOrange went inside the mission right?

13:19:05 AGP: Yes.

13:19:07 MR. MOXON: And, uh, once inside, you yelled, screamed inside the mission?

13:19:15 AGP: Uh, yes.

13:19:19 MR. MOXON: Did you care if you were disrupting services inside?

13:19:23 AGP: I cared about educating the people inside.

13:19:27 MR. MOXON: Did you care if you were disrupting services?

13:19:29 AGP: I saw no evidence of services.

13:19:33 MR. MOXON: Um, did you look in all the rooms of the mission?

13:19:35 AGP: I didn't go back.

13:19:37 MR. MOXON: [clears his throat] When you were screaming, did you want people to hear you inside the mission?

13:19:42 AGP: Yes.

13:19:44 MR. MOXON: That's why you were screaming?

13:19:47 AGP: Yes.

13:19:51 MR. MOXON: Did you care if you disrupted their services?

13:19:55 AGP: I cared about educating them about their situation.

13:19:59 MR. MOXON: Did you care if you disrupted their services?

13:20:01 AGP: They didn't say I was disrupting their services.

13:20:03 MR. MOXON: Did you care if you disrupted their services?

13:20:06 AGP: I saw no services to disrupt.

13:20:09 MR. MOXON: Did you care if you disrupted their services?

13:20:11 MR. BERRY: Objection. Asked and answered. Vague, ambiguous, irrelevant. Nothing to do with this lawsuit.

13:20:17 AGP: [makes blah-blah hand gesture.]

13:20:18 MR. CANTRELL: It's never been answered.

13:20:20 MR. MOXON: Answer.

13:20:20 MR. BERRY: He's answered, obviously, to the best of his ability. It's got noth--

13:20:23 MR. MOXON: [scoffs] Mr. Berry, please. Did you care if you disrupted their services or not?

13:20:30 AGP: Yes, I care. If I didn't care about Scientologists, I would not be in here.

13:20:37 MR. MOXON: So you wanted to disrupt their services?

13:20:39 MR. BERRY: Objection. Mischaracterizes --

13:20:40 AGP: I didn't say that.

13:20:40 MR. BERRY: -- his testimony.

13:20:41 AGP: I did not say that.

13:20:43 MR. MOXON: Did you want to disrupt their services?

13:20:45 AGP: I wanted to educate them.

13:20:47 MR. MOXON: Did you want to disrupt their services?

13:20:50 AGP: What services?

13:20:53 MR. MOXON: Services ongoing inside the mission at the time that you were screaming there.

13:20:57 AGP: I saw no services.

13:20:59 MR. MOXON: And we're going round and round.

13:21:01 MR. BERRY: Exactly, counsel, so why don't you move on?

13:21:10 MR. MOXON: Angry Gay Pope, did you care whether or not you disrupted the services, whether or not you saw them?

13:21:17 AGP: Did I care whether I disrupted the services? I don't understand the question. It's like -- I don't get up in the morning to motivate myself about disrupting services.

13:21:28 MR. MOXON: Okay. Well, you went inside a church --

13:21:31 AGP: That's --

13:21:32 MR. MOXON: -- and you're --

13:21:32 AGP: That's an org.

13:21:33 MR. MOXON: Okay, and you were screaming.

13:21:37 AGP: After they asked us to leave. While -- While we were leaving.

13:21:40 MR. MOXON: Screamed to the top of your lungs?

13:21:42 AGP: Yes.

13:21:49 MR. MOXON: Did you know people were studying Scientology materials, uh, inside that small mission?

13:21:56 AGP: No, I don't know.

13:21:58 MR. MOXON: Nor did you care, right?

13:22:00 AGP: I was there [clears his throat] to educate them. I can't call up and ask them, "Can I come in and educate you?" I just have to go in and do it.

13:22:12 MR. MOXON: Okay. There is another incident when you went to the mission and, uh, spoke to a woman you recorded your conversation, correct?

13:22:22 AGP: The Melrose mission.

13:22:24 MR. MOXON: Yes.

13:22:25 AGP: Uh --

13:22:25 MR. MOXON: Recall that?

13:22:27 AGP: I believe I may have recall-- I may have recorded that using my cell phone and then I deleted it.

13:22:33 MR. MOXON: She asked you to leave, right?

13:22:35 AGP: Yes.

13:22:36 MR. MOXON: And you --

13:22:36 AGP: And then I left.

13:22:36 MR. MOXON: -- sat down on the couch before you left and said no?

13:22:40 AGP: I don't recall that. I'd need to -- I'd need to watch a video of what happened.

13:22:45 [loud snapping sound]

13:22:49 MR. MOXON: So you don't know whether th-- whether you did or didn't -- do that?

13:22:52 MR. BERRY: Objection. Asked and answered.

13:22:56 MR. MOXON: Is that correct?

13:22:57 AGP: I left.

13:22:58 MR. MOXON: You don't know whether or not you sat down on the couch and refused to leave for a time after she's -- told you to leave?

13:23:03 MR. BERRY: Counsel, asked and answered. M-- Why don't you move on?

13:23:06 MR. MOXON: Answer.

13:23:07 AGP: I can't recall. It was such a long time ago. I --

13:23:11 MR. MOXON: Okay.

13:23:11 AGP: I barely remember that one.

13:23:14 MR. MOXON: Were you on drugs at that time?

13:23:16 AGP: No.

13:23:18 MR. MOXON: Medication?

13:23:20 AGP: Now we're right back to where we were. I -- I told you I've taken Effexor for eight years, so I was on Effexor at that time.

13:23:29 MR. MOXON: Uh, you know one of the side effects of Effexor is, uh, suicidal ideation? You aware of that?

13:23:37 AGP: Uh, it has many potentially harmful side effects, of which suicidal ideation could be one.

13:23:41 MR. MOXON: Is that one of the side effects that you have?

13:23:43 AGP: No.

13:23:45 MR. BERRY: Apparently not, counsel, he's still here.

13:23:48 AGP: [laughs]

13:23:48 MR. BERRY: And the legend goes on.

13:23:51 AGP: [holds up both wrists] No wrist slash marks.

13:23:54 MR. MOXON: One of the other side effects of Effexor is a, uh, --

13:23:57 AGP: [reaches for tissues]

13:24:00 MR. MOXON: -- homicidal ideations or desire to -- to harm others. Have you experienced that?

13:24:06 AGP: No. It causes me problems with my prostate and I don't ejaculate properly.

13:24:14 MR. MOXON: The Effexor does?

13:24:15 AGP: Yes. That's the main side effect.

13:24:19 MR. MOXON: Does it cause you to want to, uh, harm others?

13:24:23 AGP: No.

13:24:24 MR. MOXON: Have you ever had any desire to, uh, punch a Scientologist?

13:24:28 AGP: No.

13:24:29 MR. MOXON: Harm them? Trip them? Do anything to them?

13:24:31 AGP: No.

13:24:32 MR. MOXON: Hurt them in any way?

13:24:33 AGP: No.

13:24:34 MR. MOXON: Have you any desire to hurt yourself?

13:24:37 AGP: I'm sorry, say that again.

13:24:38 MR. MOXON: Have you had any desire to hurt yourself?

13:24:40 AGP: No. You mean, like self-mutilation?

13:24:42 MR. MOXON: That would be one way.

13:24:43 AGP: No.

13:24:46 MR. MOXON: [clears his throat] Uh, do you know where the Church of Scientology mission of Los Feliz is, correct?

13:24:56 AGP: Yes.

13:24:58 MR. MOXON: And you've also been there several times?

13:25:00 AGP: Yes.

13:25:02 MR. MOXON: And -- One time, you went in. You pretended you were interested in a -- in a book? Interested in reading -- Interested in getting information about Scientology?

13:25:14 AGP: Yes.

13:25:15 MR. MOXON: That wasn't really accurate, was it?

13:25:19 AGP: Uh, no, I was infiltrating.

13:25:22 MR. MOXON: And, uh, when you were outed, when someone discovered who you were, or someone else realized who you were, you -- uh, screamed inside the mission there, right?

13:25:34 AGP: Yes.

13:25:36 MR. MOXON: So people would hear you yelling?

13:25:38 AGP: Yes.

13:25:39 MR. MOXON: Did you care whether or not you disrupted services that were ongoing in that mission?

13:25:44 AGP: I saw no services.

13:25:45 MR. MOXON: That's not what I asked you. Services aren't performed in the lobby, they're in rooms offs-- off the lobby.

13:25:51 AGP: The rooms had glass walls. As I recall.

13:25:56 MR. MOXON: That's not true.

13:25:57 AGP: Oh, I seem to recall being able to see different places. Perhaps the doors were all open.

13:26:02 MR. MOXON: Did you care whether or not you were disrupting services that were ongoing in the mission?

13:26:06 AGP: I cared only about communicating with the Scientologists, because LRH says that communication is the universal solvent.

13:26:14 MR. MOXON: Whether or not they wanted to hear you?

13:26:17 AGP: Yes, that's the nature of protests. Is it not?

13:26:37 MR. MOXON: Do you intend to continue to do that?

13:26:39 AGP: To continue to do what?

13:26:41 MR. MOXON: Uh, go into churches of Scientology or missions of Scientology and loudly yell to get your point across, whatever it is?

13:26:50 MR. BERRY: Objection. Calls for speculation.

13:26:54 AGP: I can th-- I plan to continue communicating with Scientologists.

13:26:58 MR. MOXON: In that fashion?

13:26:59 AGP: I plan to continue communicating with Scientologists.

13:27:03 MR. MOXON: Yes, I understand. I'm -- I'm talking about the fashion now. Do you intend to go into churches or missions of Scientology and -- and -- and yell to people to get your point across?

13:27:13 MR. BERRY: Objection. Calls for speculation.

13:27:17 AGP: I intend to obey the letter of the law and not to trespass.

13:27:24 MR. MOXON: Angry Gay Pope, I -- If you'll listen to my question and --

13:27:27 AGP: Mm-hmm.

13:27:27 MR. MOXON: -- answer my question, we'll move on. But w-- But how it's gonna work, as you've seen, is I'll continue to repeat my question until you answer it, and we just get into arguments, and Mr. Berry pipes in, and it --

13:27:37 AGP: Mm-hmm.

13:27:37 MR. MOXON: -- and it extends the length of the deposition exponentially.

13:27:41 AGP: Mm-hmm.

13:27:42 MR. MOXON: So I'm going to ask --

13:27:45 MR. BERRY: So, counsel, --

13:27:45 MR. MOXON: -- you --

13:27:45 MR. BERRY: -- ask him a question he can answer and we'll get along much faster and much better.

13:27:50 MR. MOXON: Could you read the question back?

13:27:58 [WOMAN'S VOICE]: Yes, I understand. I'm talking about the fashion now. Do you intend to go into churches or missions of Scientology and yell to people to get your point across?

13:28:07 MR. BERRY: Calls for speculation.

13:28:11 AGP: Calls for speculation.

13:28:12 MR. MOXON: [laughs]

13:28:21 AGP: I --

13:28:21 MR. MOXON: Do you intend -- Do you intend to continue to do what you calling protests and raids, right? Yes?

13:28:26 AGP: Yes.

13:28:26 MR. MOXON: Okay. And in these -- in these protests or raids that you intend to do in the future, do you intend to loudly yell to Scientologists that are inside churches or missions of Scientology?

13:28:41 AGP: Yes.

13:28:42 MR. MOXON: Okay.

13:28:47 MR. MOXON: Do you intend to take AnonOrange with you if he's willing to go?

13:28:51 AGP: No.

13:28:52 MR. MOXON: Why?

13:28:53 AGP: Because his lawyer told him not to protest, and if I do, I'll have to give you the video.

13:29:10 MR. MOXON: You also went to, uh, Citizens Commission on Human Rights.

13:29:16 AGP: Yes.

13:29:17 MR. MOXON: But do you know -- Did he tell you why his lawyer, uh, AnonOrange's lawyer, told him not to protest any more?

13:29:24 AGP: No.

13:29:29 MR. MOXON: Did you try to dissuade him from --

13:29:33 AGP: No, I think he should--

13:29:33 MR. MOXON: -- stopping his --

13:29:34 AGP: -- do -- He told me his lawyer told him not to protest and I said you should do whatever your lawyer says.

13:29:43 MR. MOXON: Okay, you've also, uh, gone to, uh, the Citizens Commission on Human Rights, correct?

13:29:47 AGP: Yes.

13:29:49 MR. MOXON: You went there with AnonOrange?

13:29:52 AGP: Yes, that was about -- That was in 2009, I believe.

13:29:56 MR. MOXON: Okay.

13:29:56 AGP: Some time ago.

13:29:57 MR. MOXON: I think that's right. And, uh, why did you go there?

13:30:02 AGP: We wanted to enturbulate.

13:30:05 MR. MOXON: And that's because you -- it's your understanding that that organization is, uh, staffed with Scientologists?

13:30:12 AGP: It's my understanding that that organization is, uh, an anti-psychiatry museum that is anti-psych drugs and it is staffed by Scientologists.

13:30:22 MR. MOXON: Um, you went inside the lobby of CCHR with AnonOrange, right?

13:30:26 AGP: Yes.

13:30:27 MR. MOXON: And you were initially pretending you were interested in looking at the museum?

13:30:31 AGP: Yes.

13:30:32 MR. MOXON: And when you were told the museum was closed, you and Orange loudly screamed inside the, uh, CCHR lobby, right?

13:30:38 AGP: That's not entirely correct.

13:30:41 MR. MOXON: No [INAUDIBLE]. Fix it.

13:30:45 AGP: We went inside pretending to be interested and we spoke to the young man at the front desk. He told us that the museum was closing, and then we started asking him about body thetans. And he got very uncomfortable asking about body thetans. And eventually he said that we had to leave. And so we began to shout educational slogans as we left.

13:31:06 MR. MOXON: You were screaming inside the lobby?

13:31:08 AGP: Yes.

13:31:09 MR. MOXON: I see.

13:31:10 AGP: Screaming inside the lobby of the anti-psychiatric museum.

13:31:14 MR. MOXON: And you've, uh -- By the way, do you know where, uh, Delphi Academy is in Santa Monica?

13:31:24 AGP: Yes.

13:31:25 MR. MOXON: You've been there several times too, correct?

13:31:28 AGP: Yes.

13:31:29 MR. MOXON: [clears his throat] Why did -- did you go there?

13:31:34 AGP: To educate the Scientologists who run the Delphi Academy.

13:31:38 MR. MOXON: And the children?

13:31:41 AGP: No, the children wouldn't understand.

13:31:44 MR. MOXON: You were also screaming there, correct? When the children were out in the courtyard playing?

13:31:50 AGP: I'm afraid the Delphi Academy is something I'm not going to talk about, because that's pending.

13:31:56 MR. MOXON: Pending?

13:31:56 AGP: It has nothing to do with AnonOrange.

13:31:59 MR. MOXON: What do you mean, "pending"?

13:32:02 AGP: Well, we'll deal with that later. And I'm not gonna talk about it at all. And you can pull any little stunt you want, 'cause it -- I'm not gonna talk about it right now. It has no application to the Orange case. None whatsoever. Makes you look like you're on a fishing expedition. And you're vexatious.

13:32:27 MR. MOXON: When you went to the Delphi Academy to yell at the staff and the -- and the children, did you understand they were Scientologists? Is that why you went there?

13:32:41 AGP: Yes.

13:32:43 MR. BERRY: [to Angry Gay Pope] [motions with his right hand] Let's go --

13:32:44 AGP: Mm-hmm.

13:32:45 MR. BERRY: One minute.

13:32:45 [Mr. Berry and Angry Gay Pope stand to leave.]

13:32:46 WOMAN'S VOICE: [INAUDIBLE]

13:32:47 AGP: Oops! [Unplugs his microphone]

13:32:50 MR. BERRY: There's no question pending, is there? No.

13:32:55 MR. MOXON: Off the record.

13:32:57 THE VIDEOGRAPHER: The time is 1:32 P.M. We are off the record.

13:32:58 - 13:33:52 [NO RECORDING]

13:33:55 THE VIDEOGRAPHER: The time is 1:33 P.M. We are on the record.

13:34:01 MR. MOXON: When you went to, uh, Delphi Academy in Santa Monica, did you care whether or not you were disrupting their, uh, educational activities at that school with -- by screaming?

13:34:15 AGP: I cared about communicating with the Scientologists.

13:34:23 MR. MOXON: There were children present when you were screaming?

13:34:26 AGP: Yes.

13:34:28 MR. MOXON: Small children, like 4 or 5 years old?

13:34:31 AGP: Yes.

13:34:33 MR. MOXON: Do you think that would scare the children?

13:34:35 AGP: No.

13:34:37 MR. MOXON: To have a -- someone who looks like you screaming at them?

13:34:42 AGP: No, that's why I wore a rainbow shirt and I was talking to the grown-ups only.

13:34:49 MR. MOXON: You were screaming to the children not to believe their, uh, teachers, right?

13:34:53 AGP: Oh, yes, I did tell the children, "Don't let the teachers spy on your parents." I felt it was very important to alert the children of this.

13:35:03 MR. MOXON: You told them their teachers were evil, right?

13:35:06 AGP: Their teachers were spying on them.

13:35:08 MR. MOXON: You told them their teachers were evil?

13:35:10 AGP: I don't remember. And I don't have access to that footage.

13:35:15 MR. MOXON: Did you -- Did you take any footage of that event? Any of those events?

13:35:20 AGP: I have access to the footage from August. I don't have access to the footage from September.

13:35:32 MR. MOXON: So you recorded your, uh, screaming at the staff and children at Delphi in August of 2010?

13:35:40 AGP: Yes.

13:35:42 MR. MOXON: [clears his throat] Do you intend to continue to, uh, do that?

13:35:50 AGP: No.

13:35:51 MR. MOXON: Why?

13:35:53 AGP: She told me not to. The headmistress lady told me not to and I had already, uh -- She told me not to in front of the cops. So I certainly will respect that decision.

13:36:05 MR. MOXON: Did the cops tell you not to come back again?

13:36:09 AGP: The cops said, "Listen to this woman." And she said, "We don't want you to come back." And the cops said, "She doesn't want you to come back."

13:36:19 MR. MOXON: Did the cops tell you not to come back?

13:36:22 AGP: I can't remember.

13:36:23 MR. MOXON: So you have no intention of going back again? Is that what you were [INAUDIBLE]?

13:36:26 AGP: Yes, I have no intention of going back.

13:36:28 MR. MOXON: Is that because you were arrested there last week?

13:36:30 AGP: No.

13:36:31 MR. MOXON: You were arrested, weren't you, last week?

13:36:33 AGP: Yes.

13:36:36 MR. MOXON: Do you know -- Are you -- Have you been charged with a crime?

13:36:40 AGP: I have been charged with misdemeanor, uh -- what was it? -- loitering and disturbing the peace.

13:36:46 MR. MOXON: [clears his throat] Did you have any concern for, uh, scaring these four-year-old children by screaming at, uh, -- screaming near them that their teachers were evil, Scientology was evil, etcetera?

13:37:00 AGP: Yes, things like this have to be handled delicately. That's why, when the children were present, in August, I made it a very kid-friendly protest and said, [waves his right hand] "Good-bye, everybody!" when I was leaving.

13:37:13 MR. MOXON: After you screamed at them you said good-bye very nicely?

13:37:16 AGP: Yes. And the children all said, [waves right hand] "Good-bye!" And the teacher also said, [waves right hand and smiles] "Good-bye!"

13:37:25 MR. MOXON: What's wrong with you?

13:37:27 AGP: What's wrong with me?

13:37:30 MR. BERRY: Do you --

13:37:30 AGP: That's not a question.

13:37:31 MR. MOXON: Do you have a question, counsel? And you're just sitting there smirking and laughing away, you know. Let's move on.

13:37:40 MR. MOXON: Did AnonOrange tell you that, uh, the week before the arrest, that the police threatened to have him arrested if he went on the property of Golden Era?

13:37:56 AGP: Um, w-- what time are we -- What time frame is this?

13:37:59 MR. MOXON: This would be in September of 2008.

13:38:02 AGP: Could you repeat the question?

13:38:03 MR. MOXON: Yeah. Did AnonOrange tell you that the police had warned him again to stay off the property or he'd be arrested?

13:38:08 AGP: No, I don't recall that at all.

13:38:23 MR. MOXON: Did you have any discussion with Orange during 2008 about what the rules were for staying off the property? Rules for these raids.

13:38:33 AGP: W-- I don't recall discussing rules. This was pr--

13:38:36 MR. MOXON: Um, just --

13:38:36 AGP: This was what period?

13:38:37 MR. MOXON: -- kind of an understanding between you --

13:38:38 AGP: Which period is this? Uh --

13:38:39 MR. MOXON: Before the arrest.

13:38:40 AGP: Oh, before the arrest. No.

13:38:47 MR. MOXON: Was there any understanding between you, Anonymous people, as to what the general rules were for staying on or off the property?

13:38:55 AGP: No.

13:39:01 MR. MOXON: But on September 27th, you were at Golden Era, engaged in a raid there, eh?

13:39:06 AGP: Uh --

13:39:07 MR. BERRY: Clarification, counsel. Which year?

13:39:09 MR. MOXON: 2008.

13:39:10 AGP: September 27th, 2008.

13:39:13 MR. MOXON: [whispering] [INAUDIBLE]

13:39:15 AGP: Uh. Uh, I'm not sure about the exact date. I assume you're probably correct.

13:39:22 MR. MOXON: Yeah. Uh, AnonOrange posted a video of a communication he had with the police with the caption "September 27th, 2008 Scientology Operation Creep-Out Second Police Warning", remember that?

13:39:39 AGP: I think he gave it that name. What police was he talking about?

13:39:44 MR. MOXON: Uh, I don't know.

13:39:45 AGP: If it was CHIPS, that was the time I talked about. Um, I -- Do you have a video of that event that I can see to refresh my memory?

13:39:57 MR. MOXON: Yes.

13:40:11 MR. MOXON: Yes. I'll show you, uh, the video.

13:40:25 MR. MOXON: Actually, before I show you the video, let me show you this. This is the screenshots from YouTube and, uh, within the screenshot, on the side, this Operation Creep-Out.

The -- The -- The screenshot says "Scientology Operation Creep-Out Second Police Warning" and, uh, part of it shows a photograph of you, if you look at the second page.

13:40:51 AGP: Let's see, maybe this w-- [looks at photographs] That's a -- foot.

13:41:09 AGP: I think this was CHIPS.

13:41:13 MR. MOXON: Anyway, let's p-- let's play --

13:41:13 AGP: I'm not sure. It's just a foot. Uh --

13:41:17 MR. BERRY: I mean --

13:41:17 AGP: Huh.

13:41:17 MR. BERRY: Can you -- I'm confused, counsel, you're asking me -- asking the witness whether that is his foot in the photograph? Is that what you're asking?

13:41:25 MR. MOXON: [laughs] No.

13:41:27 MR. BERRY: Because I can't see any other indication that he's in the photograph.

13:41:30 MR. MOXON: No. Here, gimme this. [Mr. Berry hands photographs to Mr. Moxon] As I said, on the second page, there's a photograph of you.

13:41:36 AGP: Oh.

13:41:37 MR. BERRY: Ah, the third one down on the right, the second page, okay.

13:41:45 AGP: Well, this is a list of similar videos. This is a list of related videos. Um, so that means that -- Uh, why don't you just show me the video that's there?

13:41:59 [brief sound of a video]

13:42:01 MR. MOXON: All right, we'll play this video, see if you recall, uh, AnonOrange talking to you about this.

13:42:06 AGP: Is this a Orange video?

13:42:08 MR. MOXON: Yes.

13:42:10 [PLAYS VIDEO]

13:43:32 MR. MOXON: [while video is playing] Stop it for a moment.

13:43:34 [video stopped]

13:43:34 AGP: I'm looking to see the police car and I don't see the police car. Does the police car appear?

13:43:39 MR. MOXON: No. So do you remember Orange talking to you about, uh, communicating with a police officer who told him not to trespass on Church property dur-- on September 27th?

13:43:54 AGP: I don't recall that. All I recall is that -- taking that picture on my website that says "Jaywalking Issues". And maybe this was the same -- maybe this was the same incident. I don't know.

13:44:05 MR. MOXON: What did Orange tell you that the police had told him?

13:44:08 MR. BERRY: Objection. Vague as to time.

13:44:12 MR. MOXON: On the incident where you had indicated that the Highway Patrol had said that -- to stay off the property.

13:44:18 AGP: He said that, uh, the police were harassing us and he felt that, uh, Scientology had put the police up to it. And it's all rather academic, because the police have no idea where the easement is.

13:44:30 MR. MOXON: And they were harassing you by keeping you off Scientology property?

13:44:36 AGP: They were trying to force us to walk into the street and then yell at us for being in the street. And we couldn't stand on the curb, and the CHIPS officers kept threatening us with tickets and moving -- CHIPS officer-type harassment, that's all involving traffic and laws regarding how you walk up and down a street regarding which way the traffic is going.

13:45:02 MR. MOXON: And you say th-- they were harassing you because they wouldn't allow you to stand on the curb. You mean they wouldn't let you stand on the Church property?

13:45:10 AGP: Yes, they didn't want us standing on the curb, as I recall, and then when we walked in the street, they said that -- th-- now you're endangering. You can't walk on the street either. The exact same thing happened with Officer Kurylowicz in the pansy stomping. He demanded that we stand on the street or on the curb. Actually, he demanded that we not stand anywhere, which is impossible.

13:45:39 MR. MOXON: So this officer just said in the portion of the video that we played that walking on their property is not acceptable and that, uh, it's trespassing to walk on their property. Did you just hear that?

13:45:50 AGP: Yes.

13:45:51 MR. MOXON: Did you have any discussion with AnonOrange about those issues that day?

13:45:55 AGP: Yes, we discussed how unfair it was that the side of the road is not their property, that's the public easement, and yet we were yelled just for being there, yelled at just for being there.

13:46:04 MR. MOXON: Mm-hmm. So did you decide to just ignore what the police told you and go ahead and g-- go on the property anyway?

13:46:17 AGP: We didn't go on the property. We stood on the, uh, berm and on the, uh, the, uh, curb. And they -- they made all these threats that were empty. We never got ticketed. It was all a big -- It was an attempt to, uh, deny us our right to publicly protest.

13:46:33 MR. MOXON: It wasn't till the next week that, uh, Orange was arrested?

13:46:37 AGP: I think so. But I can't be sure unless I saw a timeline.

13:46:42 MR. MOXON: After the arrest, did you talk to Orange?

13:46:46 AGP: After the arr--

13:46:48 MR. MOXON: You mean --

13:46:48 AGP: Well --

13:46:49 MR. MOXON: Right after the arrest, --

13:46:50 AGP: Oh.

13:46:50 MR. MOXON: -- did you talk to him?

13:46:52 AGP: Lemme think back. No.

13:46:55 MR. BERRY: Is that, --

13:46:56 AGP: He was in jail.

13:46:56 MR. BERRY: -- counsel, are we talking about the arrest that is the actual subject of the Orange lawsuit? That arrest?

13:47:03 MR. MOXON: The arrest at Golden Era.

13:47:04 AGP: Right, because he's been arrested several times and not charged. The Golden Era arrest. I didn't talk to him immediately. He was in jail. And then, after he got out, he called me.

13:47:15 MR. MOXON: What did he tell you?

13:47:16 AGP: He told me what prison was like.

13:47:23 MR. MOXON: Did he tell you he'd been arrested for going on their property? Trespassing?

13:47:28 AGP: No. We didn't believe he was trespassing. We had -- But we weren't certain, and later we found out he wasn't.

13:47:35 MR. MOXON: What do you mean, you weren't certain? Why not?

13:47:37 AGP: Because the easement is a complex issue there.

13:47:40 MR. MOXON: Mm-hmm. So you were debating whether or not it was Church property?

13:47:47 AGP: No, we were angry that he had been attacked in an open field.

13:47:53 MR. MOXON: But -- When you talk about the easement, you had a dis-- you allegedly had a discussion with him immediately after he was arrested about the easement?

13:47:59 AGP: No.

13:48:00 MR. BERRY: Objection.

13:48:01 MR. MOXON: Did you have dis--

13:48:01 MR. BERRY: Mischaracterizes his testimony.

13:48:03 MR. MOXON: I'm asking, did you have a discussion with Orange after his arrest concerning whether or not there is some easement?

13:48:13 AGP: No, because immediately after his arrest, he was in jail and I couldn't talk to him.

13:48:16 MR. MOXON: I know, but you did talk to him. I'm talking about the conversation you had with him.

13:48:20 AGP: Oh, after he got out of jail?

13:48:22 MR. MOXON: I don't -- I don't know whether it was got after jail or after he called you, but he -- yes, after he got out of jail. You had --

13:48:27 AGP: He --

13:48:27 MR. MOXON: You said you had a discussion with him about the easement, correct?

13:48:29 AGP: Yes. In the weeks following, we had discussions about the easement.

13:48:33 MR. MOXON: Mm-hmm. And did he assert to you that he didn't feel the arrest was appropriate because, even though he was on Church property, there is an easement?

13:48:46 AGP: We assumed he was not on Church property, and your "No Trespassing" signs were illegal.

13:48:52 MR. MOXON: So he -- he said there were trespassing signs, but they were illegal because there's an easement?

13:48:57 AGP: "No Trespassing" signs are illegal because they are too small, the lettering is too small, and they do not cite the trespassing ordinance that they are purported to, you know, warn about.

13:49:06 MR. MOXON: Which trespa-- "No Trespassing" signs did he talk to you about?

13:49:11 AGP: All of your "No Trespassing" signs are illegal, as I determined --

13:49:13 MR. MOXON: No, --

13:49:13 AGP: -- myself.

13:49:13 MR. MOXON: -- I mean, which ones did he talk to you about?

13:49:16 AGP: The "No Trespassing" signs on the area where he was.

13:49:21 MR. MOXON: So he -- Did he describe them to you?

13:49:23 AGP: No, I've seen them myself many times and photographed them.

13:49:27 MR. MOXON: Prior to this incident?

13:49:28 AGP: Yes.

13:49:30 MR. MOXON: Did you ever talk to Orange about the "No Trespassing" signs that were there prior to the incident, prior to the arrest?

13:49:38 AGP: Yes, we discussed the fact that they were illegal, and he told me why they were illegal.

13:49:42 MR. MOXON: What did he say?

13:49:43 AGP: He told me what I just told you.

13:49:45 MR. MOXON: That the s-- That the lettering was too small, they didn't have a correct ordinance on them, something like that?

13:49:49 AGP: Yes, and they have to be -- they have to be a s-- The entire sign has to be a certain size, the letters have to be a certain size, and they have to have the legal ordinance mentioned. None of yours do that, and some of them are even illegible.

13:50:01 MR. MOXON: And therefore Orange told you, "We don't have to abide by these 'No Trespassing' signs"?

13:50:07 AGP: No.

13:50:07 MR. MOXON: Because they're illegal?

13:50:08 AGP: He never -- He never said that.

13:50:12 MR. MOXON: What's -- What's the upshot of his assertion to you that the signs were, uh, illegal?

13:50:18 AGP: The upshot was that you were deliberately trying to, uh, conceal the area in case drunken teenagers got any ideas from legal trespas-- "No Trespassing" signs.

13:50:36 MR. MOXON: Did you have any of these discussions, uh, in writing?

13:50:40 AGP: No.

13:50:40 MR. MOXON: By email?

13:50:41 AGP: No.

13:50:42 MR. MOXON: Just oral?

13:50:43 AGP: Yes.

13:50:44 MR. MOXON: Anyone else involved in these discussions about the "No Trespassing" signs?

13:50:51 AGP: Anyone who read my website, because I had an exhibit on it.

13:50:55 MR. MOXON: I'm talking about before the, uh, arrest.

13:50:59 AGP: I don't think so. No. To the best of my knowledge, I don't recollect that.

13:51:03 MR. MOXON: Where were you when you and Orange were having this discussion about the "No Trespassing" signs before the arrest?

13:51:11 AGP: Uh, I don't know. At mo-- We had probably more than one, talking on the phone.

13:51:18 MR. MOXON: Any, uh -- Any discussions while you were at Golden Era, you know, prior -- one of the prior p-- raids?

13:51:25 AGP: Possibly, but unless that was recorded on video, I -- To the best of my recollection, I can't recall a sp-- specific incident.

13:51:34 MR. MOXON: Do you have any, uh, recollection of you and Orange looking at the "No Trespassing" signs and him saying, "See, this is what I mean. They're -- They're not the right lettering" or something like that?

13:51:44 AGP: No. I remember photographing them all, because they were all different.

13:51:50 MR. MOXON: When, uh, did you take the photographs?

13:51:53 AGP: Uh, the first couple of Gold Base raids.

13:51:57 MR. MOXON: So this would've --

13:51:57 AGP: But --

13:51:57 MR. MOXON: -- been early 2008 or --

13:51:59 AGP: Uh --

13:52:00 MR. MOXON: -- Summer of 2008?

13:52:01 AGP: It -- It -- It was Fall 2008. Uh --

13:52:04 MR. MOXON: Prior to the arrest?

13:52:05 AGP: Yes.

13:52:07 MR. MOXON: Did you provide those photographs to us?

13:52:10 AGP: I believe I did. If --

13:52:11 MR. MOXON: The hard drive?

13:52:12 AGP: If -- If it was a raid that he was at, I sh-- should have provided them all. If not, they're right on my website.

13:52:20 MR. MOXON: Where?

13:52:21 AGP: Under the, uh, Gold Base Gallery. Gold Base Security Gallery. Or Gold Base Raid Gallery.

13:52:32 MR. MOXON: [clears his throat] Why were you talking about the "No Trespassing" signs with AnonOrange before his arrest?

13:52:40 AGP: Because there were so many of them and they didn't look like "No Trespassing" signs I had seen before.

13:52:45 MR. MOXON: You mean they were -- they were different than the type you had seen before?

13:52:49 AGP: Yes.

13:52:52 MR. MOXON: And so, AnonOrange did some research, did he, on "No Trespassing" signs or -- or what?

13:52:57 AGP: Yes.

13:52:58 MR. MOXON: And he -- What -- And he -- And he elucidated to you that he didn't think the lettering was appropriate and whatnot?

13:53:06 AGP: Yes, he told me they were all illegal.

13:53:08 MR. MOXON: Mm-hmm. Did you suggest to him, "You better abide by them anyway"?

13:53:16 AGP: I didn't say one thing about it.

13:53:20 MR. MOXON: Did he say --

13:53:20 AGP: No, I did not.

13:53:21 MR. MOXON: Did he say, "I can ignore these signs" or something like that?

13:53:26 AGP: No.

13:53:37 MR. MOXON: Did you talk to Mr. Berry about this, uh, uh, alleged easement issue?

13:53:45 AGP: He's my --

13:53:45 MR. BERRY: Objection.

13:53:45 AGP: -- attorney.

13:53:46 MR. BERRY: Objection. Attorney-client --

13:53:47 AGP: Attorney-client privilege.

13:53:48 MR. BERRY: -- privilege. He may call -- He may ask -- answer yes or no, but not as to the content of the communications.

13:53:54 MR. MOXON: Take the answer, yes or no.

13:53:56 AGP: Repeat the question please.

13:53:57 MR. MOXON: Did you talk to Mr. Berry about these easement issues?

13:54:00 AGP: Yes.

13:54:01 MR. MOXON: Okay. Is Mr. Berry representing you with respect to easement issues? Or AnonOrange?

13:54:09 AGP: Uh, he --

13:54:09 MR. BERRY: O-- Objection. Attorney-client privilege.

13:54:16 MR. MOXON: When did --

13:54:16 MR. BERRY: Communications in the course of an attorney-client relationship.

13:54:19 MR. MOXON: Are you instructing?

13:54:24 MR. BERRY: The privilege is his to claim or not to claim. I'm ins-- I'm giving the objection. Uh, if he wants to waive the privilege, fine, but I would -- I would advise him --

13:54:32 AGP: No, --

13:54:32 MR. BERRY: -- against it.

13:54:33 AGP: -- I do not want to --

13:54:33 MR. BERRY: [laughs]

13:54:33 AGP: -- waive the privilege

13:54:35 MR. MOXON: When did --

13:54:36 AGP: Mr. Berry --

13:54:36 MR. MOXON: -- you --

13:54:36 AGP: -- represents us both. Mr. Berry has at times represented us both.

13:54:39 MR. MOXON: When did you hire Mr. Berry?

13:54:43 AGP: Uh, that was during Operation -- after Operation "Barney and Friends", when, uh, you subpoenaed me. Or, I mean, what was that called when you had the process server ser--? When you served me. When you served me.

13:55:01 MR. MOXON: Oh, you mean the -- Lissa Uvizl case [Anti-Shirtless Lady]?

13:55:04 AGP: Yes.

13:55:05 MR. MOXON: When you were --

13:55:06 AGP: Lissa.

13:55:07 MR. MOXON: You were --

13:55:07 AGP: Lissa Uvizl [Anti-Shirtless Lady].

13:55:09 MR. MOXON: You were restrained from, uh, stalking or coming near Lissa Uvizl [Anti-Shirtless Lady]?

13:55:14 AGP: Stalking?

13:55:15 MR. MOXON: Right.

13:55:17 AGP: Uh, I have a restraining order, uh, that I do not go near her, her place of work, or her home, within fifty yards.

13:55:34 [loud snapping sound]

13:55:40 MR. MOXON: Now, after the, uh, arrest of AnonOrange at Golden Era, you came into possession of his camera, correct?

13:55:52 AGP: Uh, after the arrest of AnonOrange at Golden Era, I wasn't there at the time.

13:55:58 MR. MOXON: Did someone -- Someone gave you his camera and his, uh, video footage of the arrest?

13:56:05 AGP: As we said -- We said this in the earlier deposition, that, uh, various people gave me footage and I compiled it.

13:56:12 MR. MOXON: Okay, who gave you footage?

13:56:15 AGP: Glib -- I -- I answered this question the last time.

13:56:19 MR. MOXON: Who gave you footage?

13:56:20 AGP: Glib, SockPuppy, Orange, and I think that's all.

13:56:32 MR. MOXON: And [clears his throat] these are, uh, Anonymous pseudo names?

13:56:37 AGP: Anonymous pseudonyms. Yes.

13:56:40 MR. MOXON: Who's Glib?

13:56:42 AGP: As I mentioned the last time, Glib is, uh, -- Oh no, my mind just went blank.

13:56:48 MR. MOXON: Susan Elliott?

13:56:48 AGP: Yes. Susan Elliott is Glib. And I don't know who SockPuppy is.

13:56:56 MR. MOXON: And Orange is AnonOrange?

13:56:57 AGP: Fr-- AnonOrange, François Orange.

13:57:04 MR. MOXON: How did Susan Elliott -- Oh, we -- Didn't you also get the footage from, uh, Orange's camera?

13:57:12 AGP: Isn't he one of the people I mentioned?

13:57:13 MR. MOXON: No. Oh, --

13:57:14 AGP: No.

13:57:14 MR. MOXON: -- Orange, okay. Yeah, got his. All right, how did you get his footage?

13:57:17 AGP: I believe he gave it to me later on, uh, a CD.

13:57:22 MR. MOXON: So he didn't give you the, uh, chip out of his camera?

13:57:25 AGP: I can't remember. Uh, I can't remember the exact mechanics of it. And some of it, I think I downloaded off the internet.

13:57:35 MR. MOXON: [clears his throat] Well, how did you physically get the -- this footage?

13:57:40 AGP: The footage from AnonOrange or the --

13:57:41 MR. MOXON: Yes.

13:57:41 AGP: -- foota-- How I physically got it, I don't recall. He may have given it to me physically, I may have copied it off -- I -- I -- He probably gave it to me on a DVD. That is -- That's something you'll have to ask AnonOrange because I don't remember now.

13:57:54 MR. MOXON: You sure Mr. Berry didn't give it to you?

13:57:56 AGP: It's possible.

13:57:58 MR. MOXON: Sure Mr. Berry didn't give you the chip out of his -- Orange's camera?

13:58:02 AGP: I can't recall. It was such a long time ago and I've edited so many videos.

13:58:09 MR. MOXON: What did you do with the, uh, DVD or chip from Orange?

13:58:16 AGP: I copied it to my computer.

13:58:19 MR. MOXON: And what'd you do with the DVD or chip?

13:58:22 AGP: Uh, if it was a chip, I gave it back. If it's a DVD, I might still have it. Maybe not. I don't know.

13:58:31 MR. MOXON: And Orange told you to edit the video and put it up on the internet?

13:58:34 AGP: No, I volunteered. I told you that last time. This is all a r-- a com-- complete duplication of what we did last time. I've answered these questions before.

13:58:46 MR. MOXON: You cut some of the, uh, cut some of the footage out of the actual arrest and just prior to the arrest, correct? When you put it up --

13:58:55 AGP: Yes.

13:58:55 MR. MOXON: -- on the internet? And you told me that you did that because there -- he was swearing?

13:59:01 AGP: Yes.

13:59:02 MR. MOXON: Did he ask you to cut that out or was that your decision?

13:59:06 AGP: We decided that it should be cut out because it would be -- We were afraid it would be deleted from YouTube, because you were so aggressively deleting videos at that time.

13:59:23 MR. MOXON: So the decision to, uh, cut that out was made by you jointly? Cut out some of the swearing by Orange?

13:59:31 AGP: Yes.

13:59:32 MR. MOXON: That's when he was -- when the guards told him he was trespassing and he said, "Fuck you", right?

13:59:36 AGP: Yes.

13:59:40 MR. MOXON: Did you provide him with, uh, footage to give to the prosecutors?

13:59:46 AGP: Did I provide him?

13:59:48 MR. MOXON: Yeah.

13:59:48 AGP: I edited a YouTube video for the purposes of YouTube and, to be helpful, he personally gave that footage to the prosecutors without them having asked for it.

13:59:57 MR. MOXON: The one off YouTube?

13:59:58 AGP: Yes.

14:00:00 MR. MOXON: But that was edited to take out some of the, uh, swearing, right?

14:00:06 AGP: Yes, that was edited to take out some of the swearing because that's YouTube, and YouTube is not a court of law. When the police demanded the evidence of him, both he and I had delivered that video to you and, although I couldn't find it on that list, I told you which video that was. I sent an email to [points with his left thumb] him telling you which file that was. And that file has been provided to you uned-- It was provided to the police, unedited, when the police requested it.

14:00:33 MR. MOXON: The police subpoenaed you for evidence?

14:00:35 AGP: What?

14:00:35 MR. MOXON: Did the police subpoena you for evidence?

14:00:38 AGP: No, but, uh, you asked for, uh, -- You subpoenaed me for evidence.

14:00:44 MR. MOXON: Okay. Did the police subpoena you for evidence?

14:00:46 AGP: I must've misspoken. When you wanted the twenty-seven gigs of information, --

14:00:51 MR. MOXON: I'm talk-- My question is did the --

14:00:52 AGP: No.

14:00:52 MR. MOXON: -- police

14:00:52 AGP: No.

14:00:52 MR. MOXON: -- subpoena you?

14:00:53 AGP: No.

14:00:54 MR. MOXON: So what was given to the police, however, was the YouTube video that you edited, right?

14:00:59 MR. BERRY: Calls for speculation.

14:01:01 AGP: What was -- What was given to the police was the full edit-- f-- f-- full unedited footage which it --

14:01:07 MR. MOXON: How do you know?

14:01:08 AGP: Because, uh, Orange told me that he gave them the unedited footage when they demanded it, and I've -- I've done the same thing.

14:01:14 MR. MOXON: You gave the police footage?

14:01:16 AGP: No, I gave you the unedited footage.

14:01:18 MR. MOXON: Did you give anything to the police?

14:01:20 AGP: No. Orange did.

14:01:34 MR. MOXON: And you got, uh, the chip from SockPuppy's camera?

14:01:39 AGP: Uh, I got the video file.

14:01:42 MR. MOXON: How did you get that?

14:01:43 AGP: Uh, I may have downloaded it from the internet. I -- Or, uh, he may have given it to Orange, who gave it to me.

14:01:50 MR. MOXON: In what --

14:01:50 AGP: One w-- In one way --

14:01:51 MR. MOXON: In what form?

14:01:51 AGP: -- or the other, I got them.

14:01:52 MR. MOXON: In what form?

14:01:53 AGP: It was such a long time ago, I can't remember.

14:01:57 MR. MOXON: Did you talk to SockPuppy?

14:01:59 AGP: No.

14:02:00 MR. MOXON: Did Mr. Berry give it to you?

14:02:02 AGP: I don't recall.

14:02:03 MR. MOXON: Did you have any arrangement with Mr. Berry that you would collect the evidence?

14:02:07 AGP: No!

14:02:11 MR. MOXON: Did you have any discussion with Mr. Berry about collecting evidence of this, uh, arrest?

14:02:17 AGP: No.

14:02:19 MR. MOXON: Did you talk to SockPuppy about giving you the footage?

14:02:24 AGP: Uh, I can't recall talking to SockPuppy, but, uh, I believe, uh, no.

14:02:32 MR. MOXON: Do you have SockPuppy's phone number?

14:02:34 AGP: No.

14:02:36 MR. MOXON: How do you communicate with him?

14:02:37 AGP: I don't.

14:02:45 MR. MOXON: But you did communicate with him about getting this footage?

14:02:49 AGP: I believe it was probably through an intermediary.

14:02:52 MR. MOXON: So you don't have -- You've never had any communication with SockPuppy?

14:02:55 AGP: I have met SockPuppy. In person.

14:02:59 MR. MOXON: At -- At a raid?

14:03:01 AGP: Yes.

14:03:05 MR. MOXON: Have you talked to SockPuppy since the arrest?

14:03:11 AGP: I think I was at one raid with him.

14:03:16 MR. MOXON: You claim you don't know his name?

14:03:18 AGP: No.

14:03:18 MR. MOXON: Do you know where he lives?

14:03:20 AGP: No.

14:03:20 WOMAN'S VOICE: I'm sorry, what was that?

14:03:21 MR. MOXON: Where he lives. Do you know anything about him?

14:03:25 AGP: He's a middle-aged white man.

14:03:31 MR. MOXON: How did you get Susan Elliott's footage?

14:03:34 AGP: I believe, uh, she mailed me a DVD. I still have that DVD. I think -- I believe I still have that DVD, to the best of my recollection. [reaches for tissues and dries his hands].

14:03:57 MR. MOXON: Have you talked to, uh, Susan Elliott about this event?

14:04:02 AGP: Yes.

14:04:03 MR. MOXON: The arrest.

14:04:08 MR. MOXON: Did you talk to her about the "No Trespassing" signs?

14:04:12 AGP: To the best of my recollection, no.

14:04:20 MR. MOXON: Since the arrest, have you talked to Orange about the trespassing signs? "No Trespassing"?

14:04:26 MR. BERRY: Objection. Asked and answered.

14:04:30 AGP: Uh, I can't -- To the best of my recollection, I'm not sure. I probably have. It's likely.

14:04:46 MR. MOXON: Did you get any video from Patricia Curtis?

14:04:50 AGP: I don't think so. Resistance. It's possible, but I don't -- Since I wasn't there, I'd have to check the footage, but I -- I don't think so.

14:05:01 MR. MOXON: Did you get any footage from, uh, Barbara Graham?

14:05:07 AGP: Xenubarb, no she didn't have a camera that day.

14:05:13 MR. MOXON: Have any of your videos that you've received from any of these persons been deleted?

14:05:19 AGP: Uh, --

14:05:20 MR. MOXON: From your system?

14:05:22 AGP: No. Uh, whatever was on my system, you now have a clone of that. So whatever I gave you was the conglomerated, uh, evidence.

14:05:38 MR. MOXON: Who took the, uh, -- Who took the video of Orange being arrested?

14:05:45 AGP: Uh, I believe that was SockPuppy and, uh, Glib. O-- Either one or both. I believe th-- I know th-- SockPuppy, for sure.

14:06:00 MR. MOXON: So when the guard told Orange to leave and that he was trespassing, his response was, "Fuck you", correct?

14:06:08 AGP: Uh, yes.

14:06:09 MR. MOXON: And that's -- that's a pretty typical response by Orange, isn't it?

14:06:16 AGP: I don't what you mean by "a typical response". If someone --

14:06:18 MR. MOXON: He says that to security guards pretty often. Curses at security guards. Church security guards.

14:06:25 AGP: I've only been with him on some raids. I --

14:06:28 MR. MOXON: Have you seen him curse at Church security guards?

14:06:30 AGP: Yes.

14:06:32 MR. MOXON: Why does he do that?

14:06:34 AGP: You'd have to ask him.

14:06:38 MR. MOXON: So did it seem --

14:06:38 [loud snapping sound]

14:06:38 MR. MOXON: -- seem to you like he's kinda baiting them or sus-- or what?

14:06:44 AGP: I -- I don't know. It would just be supposition from my part.

14:06:50 MR. MOXON: Did he ever talk to you about why he does that?

14:06:53 AGP: Uh, he s-- at best has said that he, uh, should not do that, and he regrets it.

14:07:01 MR. MOXON: Why?

14:07:03 AGP: Because it, uh, is rude.

14:07:07 MR. MOXON: Doesn't he want to enturbulate them?

14:07:09 AGP: Remember w-- um, what my definition of enturbulation was? It's like, more than annoying, but it's less than harassment. So I just enturbulate. So I keep it -- keep it clean.

14:07:26 MR. MOXON: He goes beyond your level, though, doesn't he? He -- He gets in people's face more than you? In the sense --

14:07:32 AGP: That's a --

14:07:32 MR. MOXON: -- of trying to upset them more than you do.

14:07:35 AGP: I don't know. That would be a judgment call. You'd need to ask the people we talked to.

14:07:38 MR. MOXON: Yeah, I'm asking you for your judgment. Does it seem to you like he tries to annoy them even more than you do?

14:07:46 MR. BERRY: Objection. Calls for speculation.

14:07:49 AGP: I don't know of an annoyance sort of tone scale that we can measure levels of enturbulation on, uh.

14:07:56 MR. MOXON: Well, do you -- do you consider that this cussing or swearing is, uh, -- goes into the level of harassment, above annoyance, into the level of harassment?

14:08:06 MR. BERRY: Objection. Calls for a legal conclusion.

14:08:09 MR. MOXON: Legal? [scoffs]

14:08:10 MR. BERRY: Yes.

14:08:11 MR. MOXON: [laughs]

14:08:12 MR. BERRY: What is harassment and what constitutes harassment is a -- is a legal exercise and a legal conclusion for a judge to make.

14:08:20 MR. MOXON: Aw, I'm just using his terminology.

14:08:22 AGP: Um, you -- you'd need to talk to the Scientologists that met him.

14:08:26 MR. MOXON: I'm -- I'm asking you, 'cause you say you try to enturbulate, which is annoying, but not --

14:08:32 AGP: Mm-hmm.

14:08:32 MR. MOXON: -- harassing, right?

14:08:32 AGP: Yes.

14:08:33 MR. MOXON: Okay. So when you're swearing at people, telling them "Fuck you", for example, would you consider that to be more than annoying and into the level of harassment?

14:08:45 AGP: Yes.

14:08:47 MR. MOXON: I mean, that's kind of fighting words sometimes, isn't it?

14:08:50 MR. BERRY: Objection.

14:08:51 AGP: [claps his hands] Fighting is --

14:08:52 MR. BERRY: Calls for speculation.

14:08:53 AGP: He's the one who's been punched. [reaches for a tissue] And you're saying he has fighting words?

14:09:01 MR. BERRY: [to Angry Gay Pope] [whispering] Don't debate with him.

14:09:02 MR. MOXON: We'll take a break for a moment.

14:09:05 THE VIDEOGRAPHER: The time is 2:09 P.M. We are off the record.

14:09:08 - 14:22:47 [NO RECORDING]

14:22:48 THE VIDEOGRAPHER: The time is 2:22 P.M. We are on the record.

14:22:59 MR. MOXON: Do you know if, after all the warnings that, uh, Orange received about trespassing, prior to his arrest, he must've thought he'd be arrested eventually, right?

14:23:11 MR. BERRY: Objection. Calls for speculation.

14:23:13 AGP: Speculation.

14:23:14 MR. MOXON: Do you know?

14:23:15 AGP: No, I have no idea.

14:23:16 MR. MOXON: Did he ever --

14:23:16 AGP: No way to know.

14:23:17 MR. MOXON: Did he ever tell you he was concerned about getting arrested at -- someday?

14:23:22 AGP: No.

14:23:23 MR. MOXON: Did he ever tell you he hoped he'd get arrested?

14:23:26 AGP: No.

14:23:30 MR. MOXON: Did he ever tell you he thought the security guards would never arrest him?

14:23:33 AGP: Nn--

14:23:34 MR. MOXON: They'd be afraid to arrest him?

14:23:35 AGP: No.

14:23:38 MR. MOXON: Did he say the security guards are afraid to come after him?

14:23:42 AGP: No.

14:23:45 MR. MOXON: I mean, did he think the security guards didn't have the courage to -- to deal with him?

14:23:50 AGP: No.

14:23:53 MR. MOXON: Orange doesn't like, uh, Danny, does he?

14:23:56 AGP: Danny Dunagin?

14:23:57 MR. MOXON: Right.

14:23:58 AGP: Mm, a lot of people apparently don't like Danny Done-It-Again.

14:24:01 MR. MOXON: That's not what I asked you.

14:24:03 AGP: I would assume that he doesn't like him.

14:24:05 MR. MOXON: 'cause he told you that?

14:24:07 AGP: No, but I would assume it.

14:24:10 MR. MOXON: Do you know if --

14:24:10 MR. BERRY: Objection.

14:24:11 MR. MOXON: Was --

14:24:11 MR. BERRY: Speculation.

14:24:12 MR. MOXON: Do you know if Orange was, uh, trying to enturbulate the security guards before he was arrested?

14:24:20 AGP: I don't think so. Not from what I saw on the video. He was trying to defend their car.

14:24:45 MR. MOXON: Have you received any, uh, money from Orange?

14:24:50 AGP: Mmmm. Only when he would buy me dinner.

14:24:55 MR. MOXON: Anything else? Did he ever buy anything else for you?

14:24:58 AGP: Mm, no.

14:24:59 MR. MOXON: Have you given him any money?

14:25:03 AGP: No, none, unless it was for gas.

14:25:14 MR. MOXON: Have you given any donations to Orange for his legal actions?

14:25:18 AGP: No.

14:25:21 MR. MOXON: Is there anyone who is providing funding for, uh, legal defense for you or Orange? You and Orange?

14:25:29 AGP: Now you're getting into questions about my donors, and I'm not gonna answer questions about my donors.

14:25:37 MR. MOXON: I'm just talking about legal defense. Has someone provided money to you and Orange for your legal defense?

14:25:43 AGP: No, not -- no one has provided money to me specifically for my legal defense.

14:25:50 MR. MOXON: Has anyone give you money to, uh, participate in raids?

14:25:55 AGP: People give me money to protest Scientology.

14:25:58 MR. MOXON: Really? Who? [QUES]

14:26:03 MR. MOXON: Who?

14:26:04 AGP: I'm not going to tell you. That is privileged -- That is a, like a journalistic privilege.

14:26:11 MR. MOXON: That's the privilege you're asserting to refuse to answer?

14:26:14 AGP: Yes.

14:26:21 MR. MOXON: I've seen some criticism of you in the internet, saying that you took donations to pursue actions against Scientology or defend yourself in actions, legal actions, but used the money for personal purposes. You aware of those criticisms?

14:26:37 AGP: [scoffs] Those criticisms are probably written by you. Uh, anonym-- You want me to comment on anonymous internet postings about me. Could you please repeat the question?

14:26:54 MR. MOXON: Well, you answered it. You said you're aware of them.

14:26:57 AGP: Yes.

14:26:58 MR. MOXON: Are they accurate?

14:27:00 AGP: No. R--

14:27:02 MR. MOXON: So you don't --

14:27:02 AGP: Repeat the question.

14:27:03 MR. MOXON: So the donations that are given to you for legal purposes are not used by you for personal use? [QUES]

14:27:08 MR. BERRY: Objection. Mischaracterizes his testimony. Irrelevant. Privacy.

14:27:14 AGP: Mm-hmm.

14:27:15 MR. BERRY: Uh, not intended to -- not -- not leading to any admissible evidence --

14:27:20 AGP: Yes.

14:27:20 MR. BERRY: -- in the Orange trial. It may in some future case you seem to be trying to build here against this witness, but irrelevant to the Orange trial, which is the reason we are here.

14:27:31 MR. MOXON: Answer.

14:27:32 AGP: No. I'm not gonna answer.

14:27:34 MR. MOXON: You refuse?

14:27:34 AGP: I refuse to answer any questions about my donors.

14:27:44 MR. MOXON: Does Mr. Berry represent you in the, uh, Santa Monica criminal matter?

14:27:48 AGP: Yes.

14:27:51 MR. MOXON: Are you out on bail now?

14:27:53 AGP: I didn't have to post bail.

14:27:57 MR. MOXON: So you're out on personal recognizance?

14:28:00 AGP: They let me leave.

14:28:03 MR. MOXON: Were you booked?

14:28:04 AGP: Yes.

14:28:08 MR. MOXON: [clears his throat] Do you have a return date to go back to, uh, court?

14:28:11 AGP: October 7th.

14:28:22 MR. MOXON: There was no bail?

14:28:23 AGP: There was no bail.

14:28:51 MR. MOXON: There is a video that you posted called, quote, "Angry Gay Pope Clears Streets of Scientologists". Do you remember that?

14:28:59 AGP: Yes.

14:29:02 MR. MOXON: And, uh, in that video, you say -- [aside] Do you have a -- Do you have a screen shot of that?

14:29:18 MAN'S VOICE: [INAUDIBLE]

14:29:28 MR. MOXON: [whispering] So just in the video?

14:29:29 AGP: [yawns]

14:29:30 MR. MOXON: [aside] [INAUDIBLE] [whispering] Let's play it.

14:29:38 MR. MOXON: Let me, uh, [clears his throat] play this video for you, which we'll mark as Exhibit Two, right?

14:30:11 [A list of video titles appears on the mural screen.]

14:30:23 MR. BERRY: Looks like a page from "TV Guide".

14:30:27 MR. MOXON: Yeah, that's it.

14:30:30 [PLAYS VIDEO]

14:30:58 AGP: [while video is playing] [sings along with the song on the video soundtrack, "Wild Child" by Enya] "what a day to take to / what a way / what a way / to make it through / what a day / what a day to take to / a wild child" "da-da-da da-da-da da-da da, etc."

14:31:30 MR. MOXON: [while video is playing] That's enough.

14:31:33 [video stopped]

14:31:34 MR. MOXON: So that's a video that you took?

14:31:35 AGP: Yes, in 2008.

14:31:37 MR. MOXON: And those are your words?

14:31:39 AGP: Those were my words.

14:31:40 MR. MOXON: You concluded that the -- "the might OSA building has been trapped --"

14:31:43 WOMAN'S VOICE: I'm sorry, say it again.

14:31:44 MR. MOXON: "The mighty OSA, O - S - A, Building has been trapped for two hours, and another hour and a half earlier today, I've shut down this entire organization. The street is clear." Correct?

14:31:55 MR. BERRY: Objection. Uh, fails to fully state, uh, to fully set forth his statement. Why don't you say the full statement he made? You're omitting material portions of the statement, such as --

14:32:09 MR. MOXON: [scoffs] I didn't memorize the whole statement, --

14:32:11 MR. BERRY: Well, --

14:32:11 MR. MOXON: -- Mr. Berry.

14:32:11 MR. BERRY: Why don't we put the -- the whole statement in, --

14:32:12 MR. MOXON: I could --

14:32:13 MR. BERRY: -- which is that he shut it down with a copy of a magazine and some music. Which is what he said.

14:32:22 MR. MOXON: Oh, that's what you're --

14:32:22 AGP: Uh, --

14:32:22 MR. MOXON: That's what you want it to be as.

14:32:23 MR. BERRY: Oh, yes. Let's put -- Let's put the -- If you're gonna quote him, --

14:32:26 MR. MOXON: That's fine.

14:32:26 MR. BERRY: Quote him accurately.

14:32:27 MR. MOXON: That's fine.

14:32:27 MR. BERRY: [laughs]

14:32:32 MR. MOXON: [INAUDIBLE]

14:32:33 MR. CANTRELL: [INAUDIBLE]

14:32:34 AGP: No yelling.

14:32:36 MR. MOXON: So, uh, --

14:32:41 AGP: [makes a mocking face and hand gesture]

14:32:42 MR. BERRY: In fact, you might mention the magazine was Maxim magazine.

14:32:49 MR. CANTRELL: So you'd like to add to the statement that he made?

14:32:50 MR. BERRY: No, but if you sh-- if you show the picture of the magazine, you'll see it's Maxim.

14:32:55 MR. MOXON: So, uh, anyway, you put up the video saying you cleared the street of Scientologists, correct?

14:33:01 AGP: Correct.

14:33:01 MR. MOXON: All right. That was your intention?

14:33:05 AGP: Uh, my intention was to enturbulate, and then the street cleared.

14:33:11 MR. MOXON: Okay. [clears his throat] Next, Philippe.

14:33:19 MAN'S VOICE: [INAUDIBLE]

14:33:24 MR. MOXON: And this is a, uh, -- This Exhibit Two is a composite of several different videos of yours. We'll -- I'll play several others as well.

14:33:36 MAN'S VOICE: [INAUDIBLE]

14:33:38 MR. MOXON: That's -- Yeah, that's Exhibit Two.

14:33:39 MAN'S VOICE: [INAUDIBLE]

14:33:46 MR. MOXON: The next one listed on this video is, quote, "Angry Gay Pope Hassles Scientology Stress Test, Hollywood".

14:34:00 [PLAYS VIDEO]

14:35:25 [video stopped]

14:35:28 MR. MOXON: So I've just played that for you. Uh, is that, uh, -- Those are your -- your videos? Video?

14:35:35 AGP: Yes.

14:35:36 MR. MOXON: You took the video and those were your words?

14:35:38 AGP: Yes.

14:35:44 MR. MOXON: What do you mean by "Hassle Scientology Stress Test"? You -- Is that --

14:35:49 AGP: You know, that was --

14:35:49 MR. MOXON: -- self-des-- descriptive?

14:35:52 AGP: Yes. I should've said "enturbation".

14:35:54 MR. MOXON: Same --

14:35:54 AGP: [INAUDIBLE]

14:35:54 MR. MOXON: -- thing as "hassles"?

14:35:56 AGP: Uh, well, let's see. A "hassle" would have to be less than harassment, which it is, and "hassle" would have to be, uh, more than annoying. I would say hassling would be low-level enturbulation. After --

14:36:11 MR. MOXON: How?

14:36:11 AGP: -- this video, I use the word "enturbulation" all the time.

14:36:14 MR. MOXON: [clears his throat] Do you know that -- Do you know what that woman was doing out on the -- at that car table out on the street?

14:36:20 AGP: The lady in blue?

14:36:21 MR. MOXON: Yes.

14:36:22 AGP: She was diagnosing stress without a medical license.

14:36:25 MR. MOXON: And she was selling Dianetics books to people, right?

14:36:29 AGP: I didn't see her sell any.

14:36:31 MR. MOXON: Well, not where you were there. That's what her goal is, right? That's what she was trying to do is sell Dianetics books to people?

14:36:36 AGP: Yes, that is the goal of the stress test table.

14:36:38 MR. MOXON: And you basically shut that down, right? She left after that?

14:36:43 AGP: I don't think that they left that time. No, I don't think -- I don't think she shut it down. If -- If she had shut it down, I would have put that in the video.

14:36:56 MR. MOXON: You've gotten them to shut down these things on other occasions?

14:37:00 AGP: Yes.

14:37:04 MR. MOXON: Okay.

14:37:14 MR. MOXON: The next one is, uh, "Barney and Gay Pope Enturbulating".

14:37:22 MR. MOXON: Uh, --

14:37:23 [PLAYS VIDEO]

14:38:17 AGP: [while video is playing] [laughs]

14:38:29 MR. MOXON: [while video is playing] [INAUDIBLE]

14:38:35 [video stopped]

14:38:35 MR. MOXON: So this is an incident of you and --

14:38:38 - 14:38:42 [RECORDING MISSING]

14:38:42 MR. MOXON: -- in Hollywood?

14:38:43 AGP: Uh, that was the Hollywood Guarantee Building.

14:38:47 MR. MOXON: All right, that's, uh, the Church of Scientology International's --

14:38:49 AGP: It's where they've --

14:38:50 MR. MOXON: It's right in front of the L. Ron Hubbard Life Exhibition?

14:38:52 AGP: Yes.

14:38:54 MR. MOXON: [clears his throat] Uh, what were you doing there?

14:38:58 AGP: We were looking for evidence of OT powers among the guards.

14:39:01 MR. MOXON: So you were, quote "enturbulating" the guards to see if they could overpower you?

14:39:07 AGP: No, we wanted to see them exhibit OT powers and we wanted to communicate with them.

14:39:12 MR. MOXON: But you were just baiting them and harassing them, right?

14:39:16 AGP: We were enturbulating. Enturbation is not harassment.

14:39:23 MR. MOXON: Mm-hmm. When you were talking about this s-- "stupid badge" and who his wife is, and things like that, that doesn't -- Is that -- Was that your message, just to -- just to hassle him, right?

14:39:39 AGP: Enturbation, uh, involves various techniques. Uh, we were hoping that he would use OT powers, --

14:39:45 MR. MOXON: Were you --

14:39:45 AGP: -- such --

14:39:46 MR. MOXON: -- hoping he would punch you?

14:39:47 AGP: No!

14:39:48 MR. BERRY: Objection. Argumentative.

14:39:49 AGP: Mm-hmm.

14:39:50 AGP: OT powers are -- You don't need to punch people when you have OT powers.

14:39:54 MR. MOXON: So you were hoping he would overcome you with his mind? Is that what you're saying?

14:39:56 AGP: Yes.

14:39:58 MR. MOXON: I see. Okay. Uh, and that was a video that you took and you posted on the internet?

14:40:07 AGP: Yes.

14:40:12 MR. MOXON: Next one, video in this exhibit, is "Barney and Gay Pope for Four Hours Like This". Uh, Barney is Orange? Is that right?

14:40:27 AGP: Yes.

14:40:28 MR. MOXON: Okay.

14:40:29 [PLAYS VIDEO]

14:40:38 AGP: [while video is playing] [laughs]

14:41:54 MR. MOXON: [while video is playing] Okay.

14:41:56 [video stopped]

14:41:58 MR. MOXON: [clears his throat] So was that, uh, -- That was another video that you put up on the internet?

14:42:04 AGP: Yes, that was one of the earliest videos.

14:42:06 MR. MOXON: And you were taunting the security guards?

14:42:08 AGP: We were enturbulating them.

14:42:10 MR. MOXON: And you said, "Look at 'em run away"?

14:42:12 AGP: Yes, we were proving that they were not at cause over life.

14:42:17 MR. MOXON: I see.

14:42:23 MR. MOXON: Next one -- in this exhibit is "Los Angeles Protest 3/15", I guess that's March 15th, "The Gay Pope".

14:42:44 [PLAYS VIDEO]

14:42:54 MR. MOXON: [while video is playing] Philippe.

14:42:55 [video stopped]

14:42:58 MR. MOXON: [whispering] [INAUDIBLE]

14:43:14 AGP: Graham.

14:43:14 MR. BERRY: Mm.

14:43:15 AGP: When he said his name, he said his name was Floyd Patterson, but he just called him Philippe. Why is that?

14:43:21 MR. BERRY: Because they're using two different names for him.

14:43:23 AGP: And why is that?

14:43:24 MR. CANTRELL: You're not asking the questions. You're having your deposition taken.

14:43:27 AGP: Okay.

14:43:28 MR. MOXON: Did you post this video?

14:43:29 AGP: No.

14:43:33 MR. MOXON: Okay, next one is, uh, -- "Endless Giggles From the Angry Gay Pope".

14:43:44 [Message appears on mural screen: "Skipping over damaged area."]

14:43:47 AGP: Skipping over damaged area.

14:43:53 MAN'S VOICE: Oops.

14:43:56 AGP: Looks like the LRH tech has problems.

14:44:06 MR. MOXON: Is this a posting you put up on the internet?

14:44:08 [PLAYS VIDEO]

14:44:08 AGP: [while video is playing] Yes.

14:45:32 MR. MOXON: [while video is playing] Were you --

14:45:33 [video stopped]

14:45:33 MR. MOXON: -- on some speed or something when you, uh, recorded this video?

14:45:39 AGP: No.

14:45:39 MR. MOXON: Do you take meth?

14:45:42 AGP: Uh, meth --

14:45:43 MR. BERRY: Objection. Vague and ambiguous.

14:45:45 MR. MOXON: Do you do --

14:45:45 AGP: No.

14:45:45 MR. MOXON: -- crystal

14:45:45 AGP: No.

14:45:46 MR. MOXON: -- meth?

14:45:46 AGP: No, no, I don't do crystal meth. Chrystal meth makes people hyperactive and, as I explained earlier, the psychiatrist said I'm hyperactive.

14:45:53 [Sound of Mr. Berry's cell phone ringtone]

14:45:55 MR. BERRY: Excuse me.

14:45:55 MR. MOXON: Were you on some other drug this day?

14:45:58 MR. BERRY: [answering his cell phone] Hello.

14:45:58 AGP: No, Effexor.

14:46:00 MR. MOXON: That's just --

14:46:00 AGP: Just Effexor.

14:46:01 MR. BERRY: [speaking on his cell phone] Fine. I'm --

14:46:01 MR. MOXON: That's just you?

14:46:01 MR. BERRY: [speaking on his cell phone] [INAUDIBLE]

14:46:02 MR. MOXON: That's just the way you are?

14:46:02 MR. BERRY: [speaking on his cell phone] [INAUDIBLE]

14:46:02 AGP: I was --

14:46:03 MR. BERRY: [speaking on his cell phone] [INAUDIBLE]

14:46:03 AGP: I was very, uh, amped up.

14:46:05 MR. BERRY: Just a moment. [speaking on his cell phone] No, I haven't. Um, just one second. Can we take a half -- a one-minute break? [speaking on his cell phone] Okay, I'll go double-check on [INAUDIBLE]

14:46:13 THE VIDEOGRAPHER: The time is 2:46 P.M. We are off the record.

14:52:12 THE VIDEOGRAPHER: This commences Tape Number Two. The time is now 2:52 P.M. We are on record.

14:52:23 MR. MOXON: The next one on, uh, Exhibit Two that I want to play for you is "Operation Barney - Anti-Shirtless Lady".

14:52:42 [PLAYS VIDEO]

14:53:02 MR. MOXON: [while video is playing] [whispering] Find it.

14:53:08 MR. MOXON: [while video is playing] [whispering] I thought that was the composite, the one that he put out? Just to be safe. Is this the whole long [INAUDIBLE]? Yeah. It's [INAUDIBLE].

14:53:22 [video stopped]

14:53:23 MR. MOXON: [clears his throat] That was, uh, Orange inside that costume?

14:53:28 AGP: Yes.

14:53:29 MR. MOXON: And that was a video that you took?

14:53:31 AGP: Yes.

14:53:32 MR. MOXON: So you were with Orange that day?

14:53:34 AGP: Yes.

14:53:34 MR. MOXON: That you, uh, you approached Lissa Uvizl [Anti-Shirtless Lady]?

14:53:41 AGP: Lissa -- Lissa Uvizl, yeah. Uh-huh.

14:54:16 MR. MOXON: [aside] Is that [INAUDIBLE]

14:54:24 [PLAYS VIDEO]

14:54:25 MR. MOXON: [while video is playing] Uh, stop. [to Angry Gay Pope] You, uh, put up a later video of Lissa Uvizl entitled "Anti-Shirtless Lady Palooza"?

14:54:41 AGP: Yes.

14:54:41 MR. MOXON: Is that correct?

14:54:47 MR. MOXON: It says, "The clip with the funny title and the sad ending"?

14:54:50 AGP: Yes.

14:54:53 MR. MOXON: Okay, play this. Paul, mark this as Exhibit Three.

14:54:59 [PLAYS VIDEO]

14:58:40 [video ends]

14:58:40 MR. MOXON: [exhales] [clears his throat] You put that video up on the internet, right?

14:58:44 AGP: Yes, I did.

14:58:45 MR. MOXON: And you put all the subtitles on it and overlays?

14:58:48 AGP: Yes, I did.

14:58:49 MR. MOXON: Including writing her name on it, correct?

14:58:54 AGP: Uh, I believe so, yes. But par-- part of those videos was your material.

14:59:01 MR. MOXON: That -- that you -- spliced and interspersed in your own video, right?

14:59:06 AGP: Yes.

14:59:08 MR. MOXON: Why did you do that?

14:59:10 AGP: Because I was able to a--, uh, get that video --

14:59:13 MR. MOXON: No! Why did you --

14:59:13 AGP: -- from the court.

14:59:13 MR. MOXON: -- put that on the internet?

14:59:15 AGP: Why did I put it on the internet? Because I wanted people to see what Scientology is like.

14:59:24 MR. MOXON: A man, a large man, following this young girl with his shirt off. That's tat-- That's what Scientology's like?

14:59:32 AGP: No. Lissa Uvizl is a Scientologist.

14:59:37 MR. MOXON: Are you --

14:59:37 AGP: I wanted to --

14:59:37 MR. MOXON: -- obsessed with her?

14:59:38 AGP: Not at all.

14:59:40 MR. MOXON: What would you like to do to her?

14:59:42 AGP: Nothing.

14:59:48 MR. MOXON: I mean, would you like to get her alone somewhere?

14:59:50 AGP: [laughs]

14:59:50 MR. MOXON: Or what?

14:59:51 AGP: [laughs]

14:59:52 MR. BERRY: Counsel, --

14:59:53 AGP: This is silly. No. Mm.

14:59:55 MR. MOXON: Silly? She doesn't think it's silly.

14:59:58 AGP: No. I have no interest in Miss Uvizl [Anti-Shirtless Lady].

15:00:02 MR. MOXON: You -- Do you understand why she might be terrified of you?

15:00:05 AGP: Not really, since she said she wasn't scared. She said she wasn't scared. "I'm not afraid of you," she said. So why would I think she's terrified?

15:00:17 MR. MOXON: Maybe because you said you were stalking her.

15:00:20 AGP: She appeared --

15:00:20 MR. BERRY: Objection.

15:00:20 AGP: -- to have an attitude --

15:00:21 MR. BERRY: Argumentative. You're arguing with the witness, counsel.

15:00:25 AGP: Also, this issue's been settled.

15:00:28 MR. MOXON: Settled? Because there is a restraining order against you that's still pending? So that --

15:00:31 AGP: Yes.

15:00:32 MR. MOXON: That settles it -- in your mind?

15:00:34 AGP: We're here about the Orange case.

15:00:37 MR. MOXON: Uh, Orange was with you this day that you stalked this lady, right?

15:00:41 AGP: I didn't stalk her.

15:00:44 MR. MOXON: I saw a video on YouTube put up by Orange not long after this, saying he was attracted to Miss Uvizi [Anti-Shirtless Lady]. Did you ever see that?

15:00:54 AGP: Uh, I'm not sure.

15:00:57 MR. MOXON: It was taken down shortly after. He said he wanted to go out with her, was really attracted to her.

15:01:04 AGP: I don't recall seeing that video.

15:01:06 MR. MOXON: Did you ever -- Did he ever talk to you about that, his desire to have some relationship with Miss Uvizi?

15:01:14 AGP: He said he thought she was beautiful and vivacious.

15:01:19 MR. MOXON: And what did he want to do about that?

15:01:21 AGP: Nothing.

15:01:25 MR. MOXON: Hmm.

15:01:29 AGP: As -- As far as I can recall, he commented that he found her attractive and interesting, but o-- obviously we joked that she's not dating -- she's not going to date members of Anonymous, and she's married and the Sea Org doesn't allow dating.

15:01:46 MR. MOXON: Has he, uh, taken any pictures of her surreptitiously?

15:01:51 AGP: Not that I'm aware of.

15:01:53 MR. MOXON: Have you seen him go up and try to -- photograph her or anything?

15:01:58 AGP: They chatted during the, uh, Hollywood Christmas Parade -- 2008. I believe that was November 30th, 2008. They chatted briefly in the video when she discussed with him that she doesn't work on Christmas.

15:02:14 MR. MOXON: Did she tell him, "You should get a life and stop --", and leave her alone?

15:02:19 AGP: I just remember her talking about they don't work on Christmas.

15:02:25 MR. BERRY: [whispering to Angry Gay Pope] Yes or no. Yes or no.

15:02:37 MR. MOXON: You and Orange went to the, uh, L. Ron Hubbard Life Exhibit on May 15th of this year, correct?

15:02:46 AGP: We never went inside the L. Ron Hubbard Life Exhibit.

15:02:48 MR. MOXON: You drove up to the front it?

15:02:50 AGP: We were, uh, out -- What date was this?

15:02:53 MR. MOXON: May 15th.

15:02:54 AGP: 2008?

15:02:55 MR. MOXON: Ten.

15:02:56 AGP: Say it again.

15:02:56 MR. MOXON: 2010.

15:02:59 AGP: Oh! We drove past.

15:03:05 MR. MOXON: Right. And you yelled out the window, -- stopped -- stopped at the curb and screamed out the window.

15:03:12 AGP: Uh, I don't believe we stopped at the curb. [shakes his head] I yelled out the window because there was a protest going on at the time.

15:03:19 MR. MOXON: You were -- That was a violation of the restraining order, wasn't it, to be within fifty yards of Miss Uvizi's [Anti-Shirtless Lady's] office?

15:03:24 AGP: Not when I'm driving by in a car.

15:03:28 MR. MOXON: We-- You stopped, you pulled up to the curb, and you were screaming at the window.

15:03:30 MR. BERRY: Objection.

15:03:31 AGP: No.

15:03:31 MR. BERRY: Mischaracterizes the testimony.

15:03:37 MR. MOXON: And Orange was driving you, right?

15:03:39 AGP: Yes.

15:03:45 MR. MOXON: So you figured if you drive by and scream out the window that's not a violation of the restraining order?

15:03:50 MR. BERRY: Objection. Mischaracterizes his testimony. Argumentative.

15:03:53 MR. MOXON: Answer.

15:03:54 AGP: We were driving by. We were not st-- We did not stop there.

15:03:59 MR. MOXON: So do you consider that's not a violation of the restraining order?

15:04:02 AGP: No.

15:04:02 MR. MOXON: If you drive by and scream out the window.

15:04:04 AGP: I didn't comment about her. I said things like, "You deserve a living wage."

15:04:10 MR. MOXON: At her office, right?

15:04:12 AGP: At the Ivar Street location of the Regal Shoes Building and the Hollywood Guarantee Building.

15:04:23 MR. MOXON: Which you're -- Which you're prohibited by court order from -- coming to within fifty yards, right?

15:04:29 AGP: That's why we drove by.

15:04:31 MR. MOXON: Whose idea was it to drive by there, yours or Orange's?

15:04:34 AGP: I don't remember.

15:04:36 MR. MOXON: Did you tell him to stay away from there because you've got an order that you can't come within fifty yards of that building?

15:04:43 AGP: No.

15:04:47 MR. MOXON: Uh, you knew it was a violation of restraining order, right?

15:04:50 AGP: I was t--

15:04:51 MR. BERRY: Objection. Calls for a legal conclusion.

15:04:54 MR. MOXON: Answer.

15:04:55 AGP: No. I thought that when you're driving around in a car and you don't stop, that's not a violation of a restraining order.

15:05:24 MAN'S VOICE: [whispering to Mr. Moxon] [INAUDIBLE]

15:05:26 MR. MOXON: [INAUDIBLE]

15:05:27 MAN'S VOICE: [INAUDIBLE]

15:05:29 MR. MOXON: Oh, this is a different video. [clears his throat] I'm marking as Exhibit Four -- uh, another composite video that's got several different clips on it, the first of which is "Operation Barney - Kirstie Alley Diet".

15:06:28 [PLAYS VIDEO]

15:06:28 MR. MOXON: [while video is playing] Which I'll -- play for you.

15:07:02 MR. MOXON: [while video is playing] [whispering] That's good.

15:07:06 [video stopped]

15:07:06 MR. MOXON: So you -- you were following -- This is a video that you put up on YouTube, right?

15:07:11 AGP: Yes.

15:07:12 MR. MOXON: And you were walking next to and following a, uh, a staff member, Scientology staff member that was overweight?

15:07:21 AGP: We were walking back and forth in front of the Hollywood Guarantee Building, and that woman walked by.

15:07:26 MR. MOXON: And you were, uh, her -- hassling her 'cause she -- saying she was fat, basically?

15:07:31 AGP: I was enturbulating. She is not at cause over MEST if she has flaws like that.

15:07:37 MR. MOXON: Like being overweight?

15:07:38 AGP: Or wearing glasses or having a bald head.

15:07:42 MR. MOXON: She didn't have a bald head, did she?

15:07:44 AGP: N-- No, but flaws like that are an indication that you're, like, low on the tone scale.

15:07:49 MR. MOXON: So you have a lady that's overweight and you're walking next to her, telling her she should go on a diet, a Kirstie Alley diet. And she walks in and the doors close, and you and Orange loudly laugh, right?

15:08:05 AGP: Yes.

15:08:06 MR. MOXON: Basically making fun of this lady 'cause she's fat?

15:08:09 AGP: Because she is not at cause over MEST if she can't stop eating. And, according to Scientology teachings, that's her fault.

15:08:19 MR. MOXON: Hmm. Guess you were just trying to communicate to this girl, is that it?

15:08:27 AGP: Yes.

15:08:28 MR. MOXON: That's your form of enturbation?

15:08:30 AGP: Yes. Kirstie Alley is a very prominent Scientologist. If Kirstie Alley can't lose weight, goodness!

15:08:38 MR. MOXON: So any -- any Scientologist then is susceptible to being, uh, taunted by you because she's overweight?

15:08:47 AGP: Only i-- if they are -- if -- That would be a character flaw according to Scientology. Personally, I have no problem with, uh, what someone weighs. I have no problem with people who

wear glasses and I have no problem with receding hairlines. However, Scientology scripture is very specific on these things and Scientology is here to fix them and, if they're not fixed, someone is not progressing up the Bridge.

15:09:14 MR. MOXON: So you should -- So you should go after them, video them, laugh at them, and -- and put pictures of them up on YouTube, where you're taunting them, right?

15:09:21 AGP: It's enturbulation. I'm not taunting them, I'm enturbulating them.

15:09:26 MR. MOXON: [clears his throat] I see.

15:09:50 MR. MOXON: No, not the [INAUDIBLE].

15:09:58 MR. MOXON: The next one on this video I'm gonna play for you is -- got the title "Call Cops Lady".

15:10:24 [PLAYS VIDEO]

15:11:02 [video stopped]

15:11:05 MR. MOXON: So it appears -- This is a video that you put up, "Call Cops Lady", right?

15:11:09 AGP: Yes.

15:11:10 MR. MOXON: You put this on YouTube?

15:11:12 AGP: Yes.

15:11:12 MR. MOXON: And it looks like, at the beginning of the video, you see someone open a door on the Ivar Street entrance to the, uh, Church of Scientology International Building and you run down the sidewalk, correct?

15:11:25 AGP: It looks like I was walking quickly.

15:11:28 MR. MOXON: And you tell her to call the cops if she doesn't like it?

15:11:31 AGP: Yes.

15:11:40 MR. MOXON: Okay. The next one is -- "Cop Takes Names". And I want to show it to you from Exhibit Four.

15:11:57 [PLAYS VIDEO]

15:12:19 AGP: [while video is playing] [in the video, Angry Gay Pope says his hands sweat too much] You see?

15:13:46 [video stopped]

15:13:49 MR. MOXON: [clears his throat] You put this, uh, video "Cop Takes Names" up on the internet?

15:13:53 AGP: Yes.

15:13:54 MR. MOXON: And that's you and Orange, correct?

15:13:56 AGP: Yes.

15:13:58 MR. MOXON: And in the video, Officer Nelson of the LAPD tells you that you were stepping over the property line, right?

15:14:05 AGP: I believe so, yes.

15:14:06 MR. MOXON: And Orange acknowledges possibly one foot here or there?

15:14:09 AGP: De minimis issues, yes.

15:14:11 MR. MOXON: Mm-hmm.

15:14:12 WOMAN'S VOICE: I'm sorry, can you --

15:14:13 AGP: De minimis issues.

15:14:16 MR. MOXON: And the, uh, the officer says, "If it continues, they have the right to place you under private person's arrest." Right?

15:14:22 AGP: Yes.

15:14:24 MR. MOXON: And he said, "If at this point you step inside the property line, I request they film it. You guys all have cameras. That's their option." Right?

15:14:33 AGP: Yes.

15:14:35 MR. MOXON: Ahem. Did you and Orange endeavor to stay outside of the property line so you wouldn't be arrested?

15:14:44 AGP: Yes.

15:14:46 MR. MOXON: And you knew -- You and Orange both knew that if you stepped over the line, you would be subject to citizen's arrest?

15:14:53 AGP: At the HGB Building, yes.

15:14:55 MR. MOXON: Okay.

15:14:59 MR. MOXON: So the citizen's arrest could be made where somebody steps over the line intentionally after they are warned?

15:15:07 AGP: Uh --

15:15:07 MR. BERRY: Objection. Calls for a legal conclusion.

15:15:10 MR. MOXON: I mean, --

15:15:10 MR. BERRY: The video --

15:15:10 MR. MOXON: -- that's what he was --

15:15:10 MR. BERRY: The video speaks for itself as to --

15:15:12 MR. MOXON: That's what he was telling you --

15:15:12 MR. BERRY: -- what was said.

15:15:13 MR. MOXON: That's what he was telling you, you and Orange, right?

15:15:16 AGP: Could you --

15:15:16 MR. BERRY: Objection. The video speaks for itself.

15:15:22 AGP: Repeat the question.

15:15:23 MR. MOXON: I Just want to make sure I understood -- you understood that if you stepped over the property line that you could be subject to a private person's arrest?

15:15:30 AGP: Yes.

15:15:35 MR. MOXON: The next -- video I want to show you in Exhibit Four is "I know you're a closeted".

15:16:01 [PLAYS VIDEO]

15:16:16 [video stopped]

15:16:17 MR. MOXON: That's a video you put up on YouTube?

15:16:19 AGP: Yes.

15:16:20 MR. MOXON: And you were trying to communicate to a -- a Church staff member?

15:16:25 AGP: Yes.

15:16:26 MR. MOXON: You said, "I know you're a closeted homosexual"?

15:16:29 AGP: Yes.

15:16:30 MR. MOXON: Why were you saying that to him?

15:16:32 AGP: Because of the way his voice had an accent.

15:16:35 MR. MOXON: Why were you -- taunting him in that fashion?

15:16:38 AGP: Because page 125 of "Dianetics" says that homosexuals, lesbians, and sado-masochists, uh, are evil and a detriment to society. And yet here he is helping out that very same organization.

15:16:55 MR. MOXON: Hmm.

15:16:57 AGP: Self-loathing is so common among homosexuals.

15:17:01 MR. MOXON: Self-loading?

15:17:03 AGP: Self-loathing.

15:17:04 MR. MOXON: Is that -- Is that what your problem is?

15:17:07 MR. BERRY: Objection. Argumentative.

15:17:09 AGP: Yeah, it's like you're trying to insult me. I've -- I --

15:17:12 MR. MOXON: I don't know what you're trying to say.

15:17:14 AGP: I have no self-worth issues. I am neither a perfect person nor a horribly flawed person.

15:17:23 MR. BERRY: [whispering to Angry Gay Pope] One theory and you're in control.

15:17:32 MR. MOXON: [whispering] Do you have the [INAUDIBLE]?

15:17:58 MR. MOXON: [whispering] This [INAUDIBLE]?

15:18:04 MR. MOXON: I've marked as Exhibit Five another composite video containing some of - what I represent to be, or believe to be some videos that you've put up on the m-- internet

15:19:01 MR. MOXON: Last one.

15:19:07 [PLAYS VIDEO]

15:19:37 [video stopped]

15:19:41 MR. MOXON: That's, uh, "Gay Gate Guy". That's a video you put up on the internet?

15:19:48 AGP: Yes.

15:19:49 MR. MOXON: And that was a Scientology staff member. You say, "You're gay, you're gay, you faggot"?

15:19:55 AGP: Yes.

15:20:09 MR. MOXON: You telling him that to educate him?

15:20:11 AGP: Yes.

15:20:13 MR. MOXON: Mm. Okay. Let's, uh --

15:20:32 MR. MOXON: The next, uh, video I want to play for you is "Guard Police First Time".

15:20:46 [PLAYS VIDEO]

15:21:45 MR. MOXON: [while video is playing] [video shows a man in a "Barney" costume] Is that Orange in the costume?

15:21:48 AGP: [while video is playing] Yes.

15:21:55 MR. MOXON: [while video is playing] [whispers] Stop a second.

15:21:59 [video stopped]

15:22:01 MR. MOXON: The guard's telling you to step where you're trespassing, right?

15:22:04 AGP: Yes, he did.

15:22:07 MR. MOXON: And you're arguing with him about it?

15:22:10 AGP: We were on public property, as I recall, to the best of my knowledge. I don't see where -- We were not -- shooting people's feet.

15:22:19 MR. MOXON: And this was August 10th, 2008?

15:22:23 AGP: I can't remember, but -- but probably correct.

15:22:27 MR. MOXON: Obviously, the Church security guards didn't want you trespassing, right?

15:22:32 AGP: Yes.

15:22:32 MR. MOXON: And you and Orange were arguing with him about whether or not you were trespassing?

15:22:35 AGP: No, we were enturbulating him.

15:22:38 MR. MOXON: Okay. Play the rest.

15:22:41 [PLAYS VIDEO]

15:23:08 MR. MOXON: [while video is playing] Stop that a sec.

15:23:10 [video stopped]

15:23:13 MR. MOXON: So in your, uh, -- You tell the security guard if, uh, basically, if there's a dispute about the property line, go call LAPD?

15:23:24 AGP: Yes, I --

15:23:25 MR. MOXON: Right?

15:23:25 AGP: -- did.

15:23:27 MR. MOXON: And you stepped outside what he'd said was the property line, right?

15:23:31 AGP: To the best of my recollection, yes.

15:23:33 MR. MOXON: Why did you step outside what he said was the property line?

15:23:37 AGP: Because the line on the ground is where you don't step.

15:23:40 MR. MOXON: Because you what? Didn't want to be trespassing?

15:23:43 AGP: Yes, correct.

15:23:43 MR. MOXON: Orange did the same thing?

15:23:45 AGP: To the best of my recollection, yes.

15:23:48 MR. MOXON: And then the -- You were making reference to Ava Paquette, the -- the attorney, my partner?

15:23:52 AGP: Yes.

15:23:53 MR. MOXON: And you say she's a lesbian?

15:23:55 AGP: Yes, I did say that.

15:23:57 MR. MOXON: Mm-hmm. You s-- You say that for the purpose of enturbulating or, uh, or what?

15:24:01 AGP: Yes.

15:24:02 MR. MOXON: Just to upset people?

15:24:04 AGP: But something I suspect about her.

15:24:07 MR. MOXON: Mm. Is that you -- Is that part of your, quote, "educational activities", to educate her that you suspect she's a lesbian, therefore you can come and tell people that she's a lesbian?

15:24:18 MR. BERRY: Objection. Argumentative.

15:24:20 AGP: No. My purpose is to educate her that she is in an anti-homosexual group, and she does not --

15:24:27 MR. MOXON: Educate? This -- The -- You didn't say that. You said -- You told a security guard, "Tell my lesbian friend to come down." That's all you said, right?

15:24:34 MR. BERRY: Counsel, you are arguing with the witness.

15:24:36 MR. MOXON: Correct?

15:24:36 MR. BERRY: He testified as to what he testified.

15:24:39 MR. MOXON: Correct?

15:24:39 MR. BERRY: Either accept it --

15:24:41 AGP: You s-- Yes --

15:24:41 MR. BERRY: -- or ask another question, but don't argue with him.

15:24:44 AGP: Yes, you saw the video.

15:24:46 MR. MOXON: No.

15:24:48 AGP: What I say in the video is what I say in the video.

15:24:51 MR. BERRY: [whispering to Angry Gay Pope] [INAUDIBLE]

15:24:51 MR. MOXON: Okay, continue.

15:24:54 [PLAYS VIDEO]

15:25:27 MR. MOXON: [while video is playing] Stop the video a sec.

15:25:29 [video stopped]

15:25:30 MR. MOXON: Are you -- When you're telling the, uh, security guard that he's an idiot, is that part of your education of him?

15:25:35 AGP: That was part of my enturbulation

15:25:39 MR. MOXON: To -- to enturbulate the, uh, security guard?

15:25:42 AGP: Yes.

15:25:44 MR. MOXON: Why do want to enturbulate the security guard?

15:25:46 AGP: Because he's a Scientologist and, as a Scientology protester, enturbulation is what I do.

15:25:53 MR. MOXON: Are you concerned he might hit you?

15:25:56 MR. BERRY: I beg -- Restate the question --

15:25:57 MR. MOXON: Are you concerned he might hit you?

15:26:00 AGP: No.

15:26:04 MR. MOXON: Do you like it when people, uh, harass and annoy you?

15:26:09 MR. BERRY: Objection. Irrelevant.

15:26:10 MR. MOXON: Answer.

15:26:14 AGP: Uh, when people harass and annoy me?

15:26:16 MR. MOXON: Yeah.

15:26:16 AGP: No, I would not like it.

15:26:18 MR. MOXON: Continue.

15:26:21 [PLAYS VIDEO]

15:27:21 MR. MOXON: [while video is playing] Stop that for a sec.

15:27:24 [video stopped]

15:27:24 MR. MOXON: So did Orange -- Is that Orange speaking to the officer?

15:27:27 AGP: Yes.

15:27:28 MR. MOXON: He says, uh, "We're trying to put them out of business"?

15:27:33 MR. BERRY: Objection.

15:27:34 MR. MOXON: Writing.

15:27:35 MR. BERRY: The video speaks for itself. Whatever it says, it says.

15:27:38 MR. MOXON: It's not in the written record. That's what it said, right?

15:27:40 AGP: Yes.

15:27:41 MR. MOXON: Okay. Continue.

15:27:45 [PLAYS VIDEO]

15:29:00 MR. MOXON: [while video is playing] Stop a sec.

15:29:02 [video stopped]

15:29:02 MR. MOXON: You tell the police officer, "We're trying to disrupt them by preventing them from walking back and forth." Correct?

15:29:09 AGP: You'd have to play that back.

15:29:10 MR. MOXON: Okay, back up a little bit.

15:29:22 [PLAYS VIDEO]

15:31:14 MR. MOXON: [while video is playing] Okay.

15:31:15 [video stopped]

15:31:15 MR. MOXON: Do you hear that? You said, "We're trying to disrupt them by preventing them from walking back and forth"?

15:31:20 AGP: Yes.

15:31:21 MR. MOXON: Okay, continue.

15:31:22 [PLAYS VIDEO]

15:31:28 MR. BERRY: [while video is playing] [to Angry Gay Pope] -- scheme on the clip.

15:32:23 MR. MOXON: [while video is playing] Stop.

15:32:24 [video stopped]

15:32:25 MR. MOXON: Orange says, "We want to make their life difficult"?

15:32:28 AGP: Yes.

15:32:29 MR. MOXON: Okay, continue.

15:32:31 [PLAYS VIDEO]

15:33:30 MR. MOXON: [while video is playing] Stop.

15:33:31 [video stopped]

15:33:32 MR. MOXON: So you s-- You say that, uh -- You claim to the police officer that somebody was photographing you at Best Buy and you're just giving it back to Scientology? Just getting --

15:33:44 AGP: Yes.

15:33:44 MR. MOXON: Basically just getting 'em back for --

15:33:47 AGP: Yes. That's --

15:33:47 MR. MOXON: -- photographing you.

15:33:47 AGP: -- what I said.

15:33:48 MR. MOXON: So that's sort of a -- vengeance kind of a thing?

15:33:52 AGP: No, it was a return of fair game.

15:33:56 MR. MOXON: You'd say. Okay. [whispering] That's all.

15:34:07 MR. MOXON: Now, do you have any idea who SockPuppy is?

15:34:10 AGP: No, I --

15:34:10 MR. BERRY: Objection. Asked and answered numerous times.

15:34:12 AGP: Yes.

15:34:13 MR. MOXON: Do you have any idea?

15:34:15 AGP: I've told three times that I don't know who he is.

15:34:18 MR. MOXON: Have you seen him in the last year?

15:34:23 AGP: What's -- What's -- September -- I don't think I've seen him in 2010, but I can't be su-- I can't be certain.

15:34:43 MR. MOXON: Do you know where he lives?

15:34:45 AGP: No.

15:34:50 MR. MOXON: Are you part of Skeptics?

15:34:53 AGP: What's Skeptics?

15:34:55 MR. MOXON: Skeptic organization that Orange's involved in?

15:34:58 AGP: No.

15:35:13 MR. MOXON: Now, at the time of the arrest, you -- We're going back to the arrest at Golden Era. Uh, when you talked to Orange about it, did he tell you that he -- he tried to fight back with the security guards, but he was overwhelmed?

15:35:30 AGP: Uh, he told me that they dogpiled him and he bit one.

15:35:35 MR. MOXON: Mm-hmm. And was he kind of fighting back? Is that the idea?

15:35:42 AGP: Uh, I'm not sure what you mean. Could you rephrase the question?

15:35:47 MR. MOXON: Well, I mean, was he -- Yeah. I mean -- Was he -- Was he resisting, kind of fighting back? On the -- Resisting them, uh, holding him down?

15:36:01 MR. BERRY: Objection.

15:36:02 MR. MOXON: What do mean --

15:36:02 MR. BERRY: Objection.

15:36:02 MR. MOXON: -- when you say --

15:36:03 MR. BERRY: The witness lacks any percipient knowledge --

15:36:06 MR. MOXON: No, I'm asking what Orange told you.

15:36:09 AGP: Uh, you're asking me what did Orange tell me about the attack. Is that what your question is?

15:36:14 MR. MOXON: That's right.

15:36:15 AGP: Is that your question?

15:36:15 MR. MOXON: That's my question.

15:36:16 MR. BERRY: Objection. Calls for a narrative.

15:36:21 AGP: Uh, he told me that he had been dogpiled and they bit him, and everything else I know is from o--

15:36:29 MR. MOXON: He bit. He bit.

15:36:30 AGP: Yes, he bit --

15:36:30 MR. MOXON: Danny, right?

15:36:31 AGP: He bit one of the guards and they stepped on his throat. He said that they stepped on his throat for some time and he was held down on the ground for several minutes.

15:36:43 MR. MOXON: And when he told you he bit one of 'em, was he laughing?

15:36:46 AGP: No.

15:36:47 MR. MOXON: Did he say he got somebody pretty good? Bit him pretty good?

15:36:50 AGP: No, he said he couldn't breathe and he had to bite him.

15:36:59 MR. MOXON: Did he say Danny was an idiot to let himself get bitten?

15:37:03 AGP: I don't recall him even talking about who he bit.

15:37:06 MR. MOXON: Did he tell you he almost got away?

15:37:08 AGP: He almost what?

15:37:09 MR. MOXON: He almost got away from the guards.

15:37:11 AGP: No.

15:37:23 MR. MOXON: Orange tell you he won't let anybody push him around?

15:37:26 AGP: No.

15:37:27 MR. MOXON: Did he tell you that, anybody messes with him, he'll -- they'll have to pay for it?

15:37:31 AGP: No.

15:37:35 MR. MOXON: [clears his throat] Did you hear him comment that, uh, he was hoping to get a chance to go after a guard?

15:37:40 AGP: No, I never heard him comment that.

15:37:41 MR. MOXON: By the way, have you ever, uh, worked out with Orange, like in a gym or something?

15:37:46 AGP: No.

15:37:47 MR. MOXON: Do you know if he lifts weights?

15:37:51 AGP: [holds up picture of AnonOrange shirtless at his Feb. 28, 2009 Hemet protest] No, I don't think he lifts weights [slight laugh].

15:37:58 MR. MOXON: Do you know if he still dances?

15:38:01 AGP: No, I don't know.

15:38:19 MR. MOXON: Do you know if he has any source of income? Orange.

15:38:24 AGP: No, I don't know.

15:38:26 MR. MOXON: Did he tell you anybody's providing him money?

15:38:29 AGP: No.

15:38:30 MR. MOXON: Do you know if anyone is?

15:38:31 AGP: No.

15:38:32 MR. MOXON: Do you know if he's wanted anywhere?

15:38:34 MR. BERRY: [laughs] Ob-- Ob-- Objection. Vague. Ambiguous.

15:38:38 MR. MOXON: Wanted by the authorities?

15:38:40 AGP: No, he's never said anything about that.

15:38:44 MR. MOXON: Do you know how he survives, how he acquires income?

15:38:47 AGP: Uh, --

15:38:48 MR. BERRY: Objection. Calls for speculation.

15:38:52 AGP: He's told me that, uh, he relies on, uh, his savings of, is it a CD or something? I'm not -- I don't really know, other than that.

15:39:06 AGP: But he did not -- He told me he doesn't work.

15:39:11 MR. MOXON: -- take a break for a minute.

15:39:14 THE VIDEOGRAPHER: That is 3:39 P.M. We are off the record.

15:39:18 - 15:51:49 [NO RECORDING]

15:39:14 THE VIDEOGRAPHER: That is 3:51 P.M. We are on the record.

15:51:55 MR. MOXON: Mr. Miles -- Angry Gay Pope, there is a, uh, a directory on the drive that you gave us --

15:52:02 AGP: Mm-hmm.

15:52:03 MR. MOXON: -- which was full of pornographic materials, pornographic videos. It was in a recycled file. Was that an error or did you intend to give that to us?

15:52:13 AGP: Everthi-- I deleted everything that was on that previously.

15:52:17 MR. MOXON: There is a -- This is a whole folder full of pornographic --

15:52:23 AGP: You must've --

15:52:23 MR. MOXON: -- stuff.

15:52:24 AGP: You must've undeleted something.

15:52:24 MR. MOXON: Undeleted?

15:52:28 AGP: Yes, undeleted, because I erased everything on that disk, deleted all the files and then I put new files on.

15:52:34 MR. MOXON: So you had a bunch of pornography on there, you deleted it, and put this -
- put the new materials on this drive?

15:52:40 AGP: Yes.

15:52:41 MR. MOXON: All right. Well, we'll just delete it better.

15:52:46 AGP: Oh, good.

15:52:49 MR. MOXON: I guess.

15:52:52 MR. MOXON: Uh, okay, no further questions at this time, subject to a motion to compel.

15:52:58 MR. BERRY: Which I'm sure you'll meet and confer about first.

15:53:03 MR. MOXON: The, uh, court reporter will prepare this transcript and will make it, uh,
available per the Code. We'll just handle it per the Code. You can come to the court reporter's
office to, uh, --

15:53:20 AGP: Why can't you give it --

15:53:20 MR. MOXON: -- to review.

15:53:21 AGP: Why can't you send it to my lawyer?

15:53:24 MR. MOXON: Any questions, [INAUDIBLE].

15:53:28 AGP: I find it -- I find it difficult to get to the Hutchings court reporter place because I
don't own a car and then I'm forced to only look at it there and I -- if I don't remember everything
and can't take notes, then, uh, it's very difficult for me to -- to process it. Why can't you send a
copy to my lawyer? Isn't that the regular s-- Isn't that the way it usually works?

15:53:51 MR. BERRY: The answer is yes, but he's not extending you --

15:53:54 MR. MOXON: [INAUDIBLE]

15:53:54 MR. BERRY: -- the usual courtesies.

15:53:55 MR. MOXON: [clears his throat]

15:53:56 AGP: I see, you're not extending me the usual courtesies. Why -- Why is that?

15:53:59 MR. BERRY: [to Angry Gay Pope] [taps Angry Gay Pope on right shoulder]
[INAUDIBLE]

15:54:00 AGP: Okay, that's fine, I will go to [Hutchings](#) again.

15:54:03 MR. BERRY: We will deal with it. Sauce for the goose is sauce for the gander.

15:54:09 AGP: But --

15:54:10 MR. MOXON: End of deposition.

15:54:10 AGP: Mmm.

15:54:12 THE VIDEOGRAPHER: This concludes today's videotaped deposition of Angry Gay Pope. The time is 3:54 P.M. We are off the record.

15:54:18 [END OF RECORDING]