

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 MIAMI DIVISION
4 CASE NO. 13-20610-CIV

5 LARRY E. KLAYMAN, Miami, Florida
6 Plaintiff, May 30, 2014
7 vs. 2:06 p.m. to 4:21 p.m.
8 JUDICIAL WATCH, INC., Courtroom 12-2
9 Defendant. (Pages 1 to 91)

10 JURY TRIAL EXCERPT - DAY 2
11 BEFORE THE HONORABLE CECILIA M. ALTONAGA,
12 UNITED STATES DISTRICT JUDGE

13 APPEARANCES:

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I N D E X

WITNESSES

WITNESSES FOR THE PLAINTIFF:

	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Orly Taitz	3	58		

WITNESSES FOR THE DEFENDANT:

	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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EXHIBITS MARKED & ADMITTED IN EVIDENCE MARKED ADMITTED

Plaintiff's Exhibit No.1		5	
Defendant's Exhibit No. 6		44	
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1 (The following proceedings excerpt was held at 2:06 p.m.)

2 THE COURT: Please raise your right hand.

3 (Time 2:06 p.m.)

4 ORLY TAITZ,

5 a witness for Plaintiff testified as follows:

6 THE WITNESS: Yes.

7 THE COURT: Please be seated.

8 THE WITNESS: Thank you.

9 DIRECT EXAMINATION

10 BY MR. KLAYMAN:

11 Q. Would you please state your name, Ms. Taitz.

12 A. Orly Taitz.

13 Q. When were you born?

14 A. 1960.

15 Q. Can you run us through your educational background?

16 A. I'm both a licensed attorney and a licensed doctor of
17 dental surgery.

18 Q. You are a highly educated person, correct?

19 A. I have two doctor's (sic) degrees.

20 Q. And your English is very good; is it not?

21 A. I think it is okay. I speak with a accent. I wasn't --
22 clearly, I wasn't born in this country but yes.

23 Q. You understand English?

24 A. Yes, of course.

25 Q. Did there come a point in time when you attended an event

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1 by the California Voters Women's Club of Garden Grove?

2 A. Yes, sir, I did.

3 Q. And was that on or about February 23, 2012?

4 A. No, February 22nd.

5 Q. 22nd, okay. And at that event an individual by the name of
6 Constance Ruffley represented to you that she was there on
7 behalf of Judicial Watch, correct?

8 A. She did not state that.

9 MR. KRESS: Objection, leading.

10 THE COURT: Sustained.

11 MR. KLAYMAN: She is adverse, Your Honor.

12 THE COURT: Please approach.

13 (Sidebar outside the presence of the jury:)

14 MR. KLAYMAN: Your Honor, I am calling her but she is
15 an adverse witness. She's the one who published the
16 declaration of the statements against me.

17 THE COURT: I understand. Is she here from
18 California?

19 MR. KLAYMAN: Yes.

20 THE COURT: Was she subpoenaed?

21 MR. KLAYMAN: No, she is here voluntarily.

22 THE COURT: How is she an adverse witness? You didn't
23 sue her, I mean.

24 MR. KLAYMAN: I will ask it another way if you like.

25 (Sidebar concluded and the following occurred:)

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1 BY MR. KLAYMAN:

2 Q. Ms. Taitz, at that meeting did you approach Constance
3 Ruffley or did she approach you?

4 A. I was approached by Barbara Coe, the organizer of the
5 event, who after I gave my speech to the voters, she approached
6 me, together with Ms. Ruffley. She introduced her as somebody
7 who worked for the Judicial Watch but she did not state that
8 she is there on behalf of the Judicial Watch.

9 Q. I am going to turn your attention to -- you remember
10 publishing on your web site, the world's leading eligibility
11 challenge web site, Ms. Ruffley's statements that she made to
12 you that day?

13 A. Yes.

14 Q. I will turn your attention to Exhibit 1.

15 (Plaintiff's Exhibit No. 1 was marked for identification.)

16 THE WITNESS: I have with me the state -- my -- I
17 printed it out so I have it here.

18 BY MR. KLAYMAN:

19 Q. That's fine. Let's go with the actual court exhibit.

20 A. Yes.

21 Q. Bear with me. Thank you very much.

22 MR. KLAYMAN: Let the record reflect this is a blowup
23 of Exhibit 1.

24 BY MR. KLAYMAN:

25 Q. Can you recognize -- strike that.

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1 After you spoke with Constance Ruffley, you posted

2 Exhibit 1 on your web site; is that true?

3 A. Yes.

4 Q. Okay. And is there anything in Exhibit 1 with regard to
5 what Constance Ruffley told you that you didn't believe to be
6 true at the time?

7 A. No.

8 Q. Okay. So what you -- what you published in Exhibit 1 was
9 an accurate statement of what Constance Ruffley had told you?

10 A. Yes.

11 Q. And I am going to abbreviate here just to move things along
12 quickly. You stated, "Yesterday I gave a two-hour presentation
13 of my platform as a candidate for the U.S. Senate. The
14 preparation was given to some 100 California voters in the
15 Women's Club of Garden Grove. I was told that a representative
16 of the Judicial Watch drove for over an hour from San Marino to
17 hear me speak and talk to me. I got a very warm reception.
18 After my presentation, people stood up and applauded. The
19 member of the Judicial Watch approached me."

20 Is that an accurate statement, The member of the Judicial
21 Watch approached me?

22 A. Yes.

23 Q. Was that Ms. Constance Ruffley?

24 A. Yes, she approached me together with the organizer Barbara
25 Coe, yes.

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1 Q. And Ms. Ruffley gave you her card?

2 A. Yes.

3 Q. Her name is Constance Ruffley and she is an office
4 administrator for the Judicial Watch, that's what Ms. Ruffley
5 told you?

6 A. Yes.

7 Q. In their western regional headquarters at 2540 Huntington
8 Drive, San Marino. "She told me that she used to work for the
9 FBI." Did -- is that an accurate statement?

10 A. Yes.

11 Q. Did she work for the FBI?

12 A. Yes, that's what she told me. I don't have any way of
13 verifying, but that's what she told me.

14 Q. And that she worked for the Judicial Watch for many years,
15 she told you that?

16 A. Yes.

17 Q. You then write, "She actually initiated the discussion
18 about Larry Klayman." Is that an accurate statement?

19 A. Yes.

20 Q. "And she told me that she had heard that he was involved in
21 birther cases." Is that an accurate statement?

22 A. Yes.

23 Q. "I told her that this group, Article II Super PAC was
24 soliciting money, that they sent an E-mail and posted on their
25 cite an advertisement on February 10th, asking for \$25,000."

1 Is that an accurate statement?

2 A. Yes.

3 Q. "Claiming that they need to rise \$25,000 in 96 hours as the
4 cases in Florida and California need to be filed within the
5 week." Is that an accurate statement?

6 A. Yes.

7 Q. "I told her that it was a hard sell. They wrote it -- they
8 wrote, 'It is now or never,' finally saying Obama's team met
9 their match. Dissing four years of my tireless work in the
10 process and in the end nothing was filed by Larry Klayman."
11 That an accurate statement?

12 A. Yes.

13 Q. And then going down to the next paragraph. "Ms. Ruffley
14 actually advised me that Larry Klayman is not licensed in
15 California." Is that an accurate statement?

16 A. You missed one sentence, though. You missed, "It is --

17 Q. I'm going ask you about that but I want to just get to this
18 right now.

19 A. Okay.

20 Q. "Ms. Ruffley actually advised me that Larry Klayman is not
21 licensed in California." Is that an accurate statement?

22 A. Yes.

23 Q. "She told me that he no longer worked with the Judicial
24 Watch and that donors should know about litigation in Ohio
25 where he was convicted just recently of not paying large amount

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1 in child support."

2 Is that an accurate statement?

3 A. Yes.

4 Q. "She provided a lot of other information. I will publish
5 only what is public record. I am not publishing anything that
6 is not public record." Is that an accurate statement?

7 A. Yes.

8 Q. During that conversation with Ms. Ruffley, did she tell you
9 that -- anything about a Florida matter involving Natalia Humm
10 and my representation of her?

11 A. No.

12 Q. She did tell you, however, that I was not licensed in
13 California?

14 A. Yes.

15 Q. Now, you are aware that my not being licensed in California
16 would not preclude me from entering a case there, correct,
17 under *pro hac vice*?

18 A. It will preclude you from becoming an attorney on a case.
19 And if you wanted to be part of a case in California, actually
20 those donors had to find a California attorney who would file a
21 case in California and would file a motion with a judge asking
22 the judge to add Mr. Klayman as an additional attorney on the
23 case. And the judge may or may not allow it.

24 I have seen cases where judges allowed attorneys from out
25 of state to join cases and I have seen cases where judges did

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1 not allow attorneys to join. They review the whole history of
2 an attorney. They review if attorney had any sanctions, any
3 actions against him by the bar of another state. So,
4 actually -- I'm sorry, Mr. Klayman, but I actually wrote in
5 this article that this is something that had to be disclosed
6 when the bloggers were soliciting donations for you to file a
7 case in California because they had to explain to the public
8 that you cannot file a case in California, that it had to be
9 filed by somebody else and there was a question if the judge
10 would allow you to join another attorney.

11 Q. But you don't know one way or the other whether I would be
12 admitted in California, do you?

13 A. I know that you are not admitted.

14 Q. Under *pro hac vice* for that particular case, you didn't
15 know whether I would be admitted or not, did you?

16 A. I know that you could not file a case for sure.

17 Q. Calls for a yes or no.

18 A. I -- I just answered.

19 Q. You are saying, what you basically testified to is that I
20 could be admitted if the judge let me in, correct?

21 A. If the judge would allow another California attorney who
22 filed the case to bring you as an additional --

23 Q. Right.

24 A. -- attorney.

25 Q. And are you aware that I have California lawyers working

1 with me as associates?

2 A. I -- no, I don't know who are your associates but I have
3 seen a case in Arizona where you tried to join and the judge
4 did not allow it.

5 Q. I am not asking about that. I am asking, are you aware
6 that I have lawyers working with me who are California lawyers?

7 A. I don't know who is working with you.

8 Q. You didn't know one way or another?

9 A. I don't know.

10 THE COURT: Don't interrupt the witness.

11 MR. KLAYMAN: Okay.

12 THE COURT: Only one can speak at a time.

13 MR. KLAYMAN: Okay.

14 BY MR. KLAYMAN:

15 Q. Now, with regard to the issue of my being convicted of a
16 crime and giving the information to donors, that's something
17 Ms. Ruffley told you, correct?

18 A. Well, she didn't say that you were convicted of a crime.
19 She said, from what I understand, this is not considered to be
20 a crime. I believe this -- I believe -- I looked up the case
21 and I believe it's considered to be misdemeanor in Ohio but, at
22 any rate, she just told me that you were convicted of
23 nonpayment of child support.

24 Q. Now, you are a lawyer, correct?

25 A. Yes.

1 Q. The word "convicted" deals with a criminal matter; does it
2 not?

3 A. Criminal matter but not necessarily a crime.

4 Q. Well, criminal matter is a crime; is it not, Ms. Taitz?

5 A. There are crimes and there are misdemeanors.

6 Q. If you are convicted, it's a crime.

7 A. For example, you have --

8 Q. It calls for a yes or no.

9 THE COURT: Please, only one of you can speak at a
10 time.

11 MR. KLAYMAN: Okay.

12 THE WITNESS: I do not agree with your statement,
13 Mr. Klayman. I believe that sometimes people are convicted of
14 misdemeanors or when you look at their traffic records, they
15 would say "convictions" but none of those are crimes. Those,
16 actually, not just misdemeanors, some of them are infractions
17 which is even lower than the misdemeanor, so no --

18 BY MR. KLAYMAN:

19 Q. Misdemeanor is not a crime; you are saying that?

20 A. What I am saying that there are crimes than -- that -- than
21 the lower level in misdemeanors and a level which is even lower
22 would be infraction. And when you look at your, for example,
23 at your record from DMV, they will write "convictions" but none
24 of those or usually are crimes. Those infractions which are
25 the lowest convictions and then there are misdemeanors which

1 are higher and extremely rarely would there be a crime.

2 MR. KLAYMAN: Nonresponsive. Move to strike, Your
3 Honor.

4 THE COURT: Denied.

5 BY MR. KLAYMAN:

6 Q. Misdemeanor is a crime; is it not, Ms. Taitz? You are a
7 lawyer.

8 A. I believe it's asked and answered.

9 Q. No, I am asking it again because you didn't answer the
10 question. A misdemeanor is a crime?

11 MR. KRESS: I will object. It has been asked and
12 answered. And it's also calling for a legal conclusion.

13 MR. KLAYMAN: She is a lawyer.

14 THE COURT: She is not testifying as an attorney or a
15 legal expert.

16 MR. KLAYMAN: Yeah, but she's just -- she gave the
17 impression that a misdemeanor --

18 THE COURT: She has given her opinion.

19 MR. KLAYMAN: Yeah.

20 THE COURT: She has answered the question a couple of
21 times.

22 MR. KLAYMAN: Is a misdemeanor a crime or not; can I
23 ask that question, Your Honor?

24 MR. KRESS: I will object. It's been asked and --

25 THE COURT: If you know, Ms. Taitz.

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1 THE WITNESS: I answered twice. In my opinion, when
2 misdemeanor -- well, it's not considered to be a crime. It's
3 considered to be a lower violation than a crime and that's why
4 we do have divisions. We have infractions. We have next level
5 which is higher than infraction: misdemeanors. And the highest
6 level is a crime.

7 So what I am saying that when Ms. Ruffley said that
8 Mr. Klayman was convicted of nonpayment of child support, I did
9 not know what level is it considered in the state of Ohio. And
10 from what I read -- I did read the opinion of Your Honor and
11 from what I understand in Ohio, it is not considered to be a
12 crime.

13 MR. KLAYMAN: Objection, Your Honor.

14 THE COURT: I'm sorry, you asked the question.

15 MR. KLAYMAN: Well, I am talking about her talking and
16 characterizing your opinion, I think that's inappropriate.

17 THE WITNESS: I am not characterizing, I am quoting.

18 BY MR. KLAYMAN:

19 Q. We have a motion.

20 You are aware that the statement that Ms. Ruffley made to
21 you that you just testified was accurate --

22 A. Yes.

23 Q. -- you didn't differentiate between misdemeanor and felony,
24 correct?

25 A. No, but what -- but you misrepresented what she said. She

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1 said that you were convicted of nonpayment of child support and
2 you misrepresented it by saying she said that you were
3 convicted of a crime. And I said, No, she did not say that.
4 She said that you were convicted of nonpayment of child support
5 and Your Honor wrote an opinion when she said -- when she
6 stated that in Ohio it's -- it's a misdemeanor, it is not a
7 crime.

8 Q. Ms. Taitz, that's not my question. You don't know what
9 Ms. Ruffley was referring to, whether it was a misdemeanor or a
10 felony when she made that statement that you published on your
11 web site.

12 A. And I didn't say that it was a felony.

13 Q. Yes or no? Yes or no?

14 A. I did not -- I did not know what she meant and I wrote what
15 she said.

16 Q. Right. And she didn't differentiate between misdemeanor
17 and felony, did she?

18 A. She did not. And --

19 Q. So the reader could have thought it was a felony, correct?

20 MR. KRESS: Objection.

21 THE COURT: Please. Do we need to take a break so I
22 instruct both of you about one speaking at one time only,
23 Mr. Klayman?

24 MR. KLAYMAN: No, Your Honor.

25 THE COURT: Or have I made myself clear?

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1 MR. KLAYMAN: You have made yourself clear.

2 THE COURT: All right. Let that be the last time.
3 Question, pause, answer, pause. Question, pause, answer,
4 pause. Are we clear?

5 MR. KLAYMAN: Yes.

6 BY MR. KLAYMAN:

7 Q. From what you published and Ms. Ruffley said, the reader
8 would not know whether I was convicted of a misdemeanor or a
9 felony, correct?

10 MR. KRESS: Objection, calls for speculation.

11 THE COURT: Overruled.

12 THE WITNESS: I do not know what was her thinking. I
13 do not know what's the thinking of people who read it. I just
14 wrote what she stated. She stated that you were convicted of
15 nonpayment of child support, that's all.

16 BY MR. KLAYMAN:

17 Q. Yeah.

18 Now, after you published that statement, I asked you to
19 correct the statement, didn't I?

20 A. Yes, and I did immediately.

21 Q. Okay. You did three days later, correct?

22 A. That -- right -- when you contacted me, I believe the same
23 day or next day, you didn't contact me on the 23rd. I believe
24 you contacted me on the 25th and I corrected it on the 26th.

25 It was very quickly that I wrote a second article where I

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1 corrected this that Mr. Klayman has contacted me and he said
2 that he was indicted but he was not convicted yet. And I wrote
3 on my web site that I was contacted by Mr. Klayman and he said
4 that he was indicted, he was not convicted yet.

5 Q. I never told you that I was not convicted yet, did I?

6 A. Yes, that's exactly what you told me, that you were not
7 convicted yet.

8 Q. I used the word "yet"?

9 A. That's what I remember -- that's what I remember that, I
10 cannot tell if you used the word "yet."

11 Q. So you are making that up yourself.

12 A. Mr. Klayman has contacted me. From what I recall, he
13 stated that he was indicted but he was not convicted yet;
14 that's what I remember, that's what I posted.

15 Q. You realize you are under oath?

16 A. Yes, I am.

17 Q. No one from Judicial Watch ever contacted you to tell you
18 to correct that statement, did they?

19 A. Not as far as I remember.

20 Q. And before you published Ms. Ruffley's statement that I was
21 convicted for nonpaying child support, no one had ever told you
22 I was convicted of anything, correct? She is the first person
23 who said that?

24 A. Yes.

25 Q. Ms. Taitz, I am going to show you a document which has been

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1 marked and admitted into evidence as Joint Exhibit 17.

2 (Joint Exhibit No. 17 was marked for identification.)

3 Do you recognize that? That's an E-mail from me to you.

4 A. I don't see anything on my screen. It's empty. Now, I do.

5 Yes.

6 Q. Do you remember receiving that E-mail?

7 A. Yes.

8 Q. On February 24th?

9 A. I don't know which day it was, February 24th --

10 Q. It's February 24th.

11 A. 24th in the afternoon, yes.

12 Q. Done on the 24th. And in this E-mail I am asking you to

13 correct what Ms. Ruffley told you --

14 A. Um-hmm.

15 Q. -- that I had been convicted of nonpayment of child support
16 and the information should be given to donors, correct?

17 A. Yes.

18 Q. And that occurred just one day after the publication, which
19 is Exhibit 1, correct?

20 A. Yes, it happened on the 24th and I believe the correction
21 came, I think, on the morning of the 26th. On the 25th, I
22 checked what you said. You sent this to me in the afternoon of
23 the 24th.

24 Q. Yeah, but the publication was on the 23rd, correct?

25 A. The publication was on the 23rd, you have sent this E-mail

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1 on the -- Mr. Klayman sent this E-mail on the 24th -- and in
2 the afternoon -- and, I believe, I was out of town. From what
3 I recall, I was at the Republican party convention. And when I
4 arrived home, which was, I believe, on the 25th -- I don't
5 recall was it the 25th or 26th but as I arrived home and I
6 checked everything, I posted right away a correction which was
7 on the 26th. So within one day of the E-mail, I have posted
8 the correction.

9 Q. Well, the E-mail was dated the 24th; was it not?

10 A. Yes, the E-mail was on the 24th and I also remember that
11 you called me and I was -- and I told you on the phone that I
12 am out of town, that my husband and I are at a convention and
13 when I will arrive back to Southern California, I will make
14 sure to post a correction, which I did.

15 Q. In fact, I called you on the 23rd; did I not?

16 A. I don't believe so.

17 Q. Immediately, correct?

18 A. I don't think so.

19 Q. So when you just testified that it took four days for me to
20 contact you --

21 A. I just.

22 Q. You were lying -- you lied, weren't you?

23 THE COURT: Ladies and gentlemen, we will take a nice
24 afternoon recess. Please don't discuss the case.

25 COURT SECURITY OFFICER: All rise.

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1 (The jury exited the courtroom at 2:28 p.m.)

2 THE COURT: I thought I had made myself clear.

3 MR. KLAYMAN: Your Honor, if I talked over her, it was
4 inadvertent at the end. I will be careful not to do that. I
5 guess I am getting a little excited because it was not
6 truthful.

7 THE WITNESS: May I respond?

8 THE COURT: I just am trying to have a good record and
9 I am trying to make the life of my court reporter bearable for
10 her. I asked more than once that each of you speak one at a
11 time; did I not?

12 MR. KLAYMAN: I agree, Your Honor.

13 THE COURT: How many times did I make that known?

14 MR. KLAYMAN: I think you asked twice.

15 THE COURT: Or three times.

16 MR. KLAYMAN: Or three. And I will be very careful.

17 THE COURT: I don't care how excited you get,
18 Mr. Klayman.

19 MR. KLAYMAN: I agree.

20 THE COURT: It is inexcusable.

21 MR. KLAYMAN: I will be --

22 THE COURT: So let me take a break -- we are going to
23 take a break so everybody's blood pressure can come down,
24 including my own, and you will both mind my clear instruction
25 which is: You ask a question, there is a pause, there is an

1 answer, there is a pause, you ask another question, there is a
2 pause, you answer, pause. Are we clear?

3 MR. KLAYMAN: I do, Your Honor. Can I ask for an
4 instruction? I think this is part of the problem and I do
5 apologize for doing that. It was not intentional. Would you
6 give Ms. Taitz an instruction to answer only the question and
7 not to go off in other directions which have nothing to do with
8 the question?

9 THE COURT: She is allowed to give an explanation.
10 Every witness is allowed to answer.

11 MR. KLAYMAN: No, I agree with that but she is going
12 far afield --

13 THE COURT: And please don't interrupt me, as well.

14 MR. KLAYMAN: I'm sorry.

15 THE COURT: She is allowed to answer your question,
16 yes or no, and give an explanation. If you don't like what --
17 the explanation she is giving --

18 MR. KLAYMAN: Okay. I apologize, Your Honor.

19 THE COURT: -- that is not a basis for you to cut her
20 off mid-sentence.

21 So we are taking a break and I expect the remainder of
22 this examination to go as I have indicated. Any questions?

23 MR. KLAYMAN: No, Your Honor.

24 THE COURT: Any questions, Ms. Taitz?

25 THE WITNESS: No.

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THE COURT: Thank you.

(A recess was taken from 2:30 p.m. to 2:42 p.m.)

THE COURT: Let's bring the jury in, please.

COURT SECURITY OFFICER: All rise.

(The jury entered the courtroom at 2:42 p.m.)

THE COURT: Everyone, please be seated.

BY MR. KLAYMAN:

Q. Ms. Taitz, you previously testified that it took me four days to contact you to ask for a correction, right?

A. No, I never said this. Can the court reporter please read what I said? I did not say four days. Four days? I did not say any specific number of days. I stated that you did not contact me right away, that when you contacted me, I made a correction. I did not say four days.

Q. In fact, I contacted you immediately, correct?

A. Well, it was not immediate. I have talked to Ms. Ruffley in the evening of the 22nd. After our conversation, I went home. I wrote the article. It was at night from the 22nd to the 23rd and this E-mail came in the evening of the 24th, so it was nearly full two days from the time I posted the article until this E-mail arrived. And I have talked to Mr. Klayman on the phone and I told him, I will respond to your E-mail.

I don't know if the jury has seen this E-mail but the E-mail is basically a threat. It says, My clients Pamela Barnett and Mr. Miller -- George Miller are going to sue you.

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1 I am going to sue you. You are posting incorrect information.
2 And I talked to Mr. Klayman on the phone. I told him I am out
3 of town, I am at a convention with my husband. The moment I
4 arrive home, I will post a correction. So this E-mail came in
5 the evening of the 24th and from what I recall, the correction
6 was posted in the morning of the 26th, within one day since
7 Mr. Klayman has sent me this E-mail.

8 And I also talked to Ms. Barnett because the E-mail that
9 Mr. Klayman sent to me on the 24th starts by saying, Dear
10 Ms. Taitz, my clients, which include George Miller and Pamela
11 Barnett, recently contacted you to put you on notice that your
12 web site published to the world contained and continues to
13 contain false and defamatory material concerning my clients and
14 me.

15 So, first of all, I contacted them and actually Ms. Barnett
16 told me that Mr. Klayman is threatening to sue them because
17 they did not forward to him all the money that he believes they
18 collected. And so I wanted to know what was defamatory about
19 them and there was nothing defamatory about his clients.

20 My -- the article that I posted dealt with the fact that
21 the bloggers, Mr. Miller, Ms. Barnett and a number of other
22 bloggers have posted -- have posted an advertisement on
23 February the 10th. And in that advertisement, which was a very
24 intense sale, they were urging the public to donate money
25 within 96 hours -- four days, so that Mr. Klayman will file two

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1 lawsuits in California and in Florida within one week. And
2 they were saying -- and I actually have this advertisement that
3 they posted, so they were saying you have to donate all this
4 money now. And all of those bloggers were pushing people:
5 Donate, donate, donate for Mr. Klayman. And they said, Time is
6 of the essence. They were saying you have to donate now
7 because he needs to file a lawsuit -- two lawsuits against
8 Barack Obama, one in Florida, one in California within one
9 week, which would have been February the 17th.

10 So I posted on my web site a true and correct statement
11 that, as of February 22nd, there were no lawsuits filed on
12 behalf of Mr. Klayman. And, actually, I brought with me those
13 statements that I posted. I said, Well, did anybody see those
14 lawsuits filed by Mr. Klayman on the 17th? Nobody saw them.

15 I posted, again, Well, what happened to all the money that
16 all of the bloggers were collecting for Mr. Klayman? How much
17 money was collected? And what happened to all this money?
18 Then I posted another notation on the 22nd stating that I was
19 contacted by Ms. Barnett and she said that she and Mr. Miller
20 no longer work with this group of bloggers, Article II Super
21 PAC.

22 So there were two groups of people that were collecting
23 money. They were saying that there will be transparency.
24 There was no transparency. Nobody knew how much money was
25 collected. And as a matter of fact, Ms. Barnett said that you

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1 are threatening and you are still threatening to sue them.

2 So I -- when I received the E-mail from Mr. Klayman, first
3 of all, I checked what Mr. Klayman is saying and there are
4 multiple allegations in this E-mail, multiple threats, and the
5 only thing that I was able to find that there was one statement
6 by Ms. Ruffley that was erroneous. She said, He was convicted
7 of nonpayment of child support. In reality, actually, he was
8 found three times in criminal contempt of court of nonpayment
9 of child support in family court and he was indicted in
10 criminal court but he was not convicted in criminal court.

11 So I made a correction. When I -- when I checked the
12 facts, I found there was only one fact that was incorrect and I
13 made a correction on the same blog.

14 But there -- this E-mail it's an extremely threatening
15 E-mail. It threatened me with multiple lawsuits from multiple
16 individuals including Pamela Barnett, George Miller. There was
17 no basis and I had to check what is he talking about.

18 He should -- Your Honor, should I read this E-mail that
19 Mr. Klayman --

20 THE COURT: Why don't you wait for a question,
21 Ms. Taitz.

22 THE WITNESS: Okay. But that's -- what was happening.
23 I received from Mr. Klayman this E-mail. I checked. I
24 contacted Ms. Barnett. I found out that it was just one
25 inconsistency and I found out Mr. Klayman was threatening them

1 just as he was threatening me.

2 BY MR. KLAYMAN:

3 Q. You stated that you got this E-mail in the evening,
4 correct?

5 A. I believe so.

6 Q. In fact, you got it at 4:22 in the afternoon, correct?

7 A. Well, 4:22 is afternoon, it's -- okay.

8 Q. So it wasn't the evening?

9 A. 4:20 -- okay, it was at 4:22 in the afternoon.

10 Q. Okay. Ms. Taitz, you -- before Connie Ruffley ever said
11 what she said to you, you had brought a number of lawsuits
12 challenging the president's eligibility, correct?

13 A. Yes.

14 Q. Where had you brought those lawsuits?

15 A. In multiple states.

16 Q. In California?

17 A. Yes.

18 Q. What other states?

19 A. I -- there were cases that I brought *pro se* and there were
20 cases that I brought where I received *pro hac vice* in other
21 states.

22 Q. Okay. And the reason that your web site is called the
23 world's leading eligibility web site is because you were
24 thought of as the primary person challenging the president's
25 eligibility, correct?

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1 A. It is no longer called this way. It used to be called this
2 way. I changed the name of my web site a while ago. But, yes,
3 I was an attorney that brought a number of cases. But, again,
4 I am looking at this E-mail that you sent and -- excuse me, one
5 second, I am trying to see.

6 Q. It's up on the screen so everybody can see it, Ms. Taitz.

7 A. For example, in your E-mail you are stating that,
8 specifically and without limitation, you have stated that my
9 clients, in effect, are defrauding the public of raising funds
10 for eligibility challenges.

11 I never said this. And if the Court would allow me, I
12 would just read to the jury what I wrote. I never said that
13 they are defrauding the public. I said that they -- there were
14 specific parameters. They said, We need to raise this money by
15 specific date, within four days, so that Mr. Klayman will file
16 a lawsuit by February 17th on that specific date.

17 And that did not happen. Mr. Klayman did not file either
18 one of the lawsuits by February the 17th. So, clearly, when
19 people were donating money for Mr. Klayman to represent those
20 plaintiffs -- to represent plaintiffs in Florida and in
21 California, the public knew that there were supposed to be
22 lawsuits by specific date and those lawsuits were not filed.
23 So I provided true and correct statement on that.

24 Further, you were saying -- "and that I have been convicted
25 of a crime." I did not state that. I stated that Mr. Klayman

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1 was convicted of nonpayment of child support. This is not a
2 crime and it's -- as I stated, it's a misdemeanor.

3 Further, he stated in his E-mail, "Have not done work on
4 the project." I did not -- I did not accuse Mr. Klayman of not
5 doing work on the project. In my E-mail, I posted a true and
6 correct statement from the Supreme Court of Florida, which an
7 article from the newspaper and a statement from the Supreme
8 Court of Florida where they -- it was written about a case
9 where a client has brought a complaint against Mr. Klayman
10 for -- where he collected the same amount, \$25,000, she stated
11 the work was not done. He was supposed to refund the money, he
12 didn't and Florida state bar has sued Mr. Klayman and he was
13 supposed to refund the money. The case was in the Supreme
14 Court of Florida.

15 So I was not defaming him. I was not just saying he -- as
16 he is stating in his E-mail, You accused me of not doing work.
17 I didn't accuse him. I posted -- I posted on my web site a
18 printout from the Supreme Court of Florida. And it says in the
19 Supreme Court of Florida, the Florida bar Supreme Court, case
20 number, complainant, against Larry Elliot Klayman, respondent
21 and complaint and it talks about specific case that was filed
22 by this Florida bar against Mr. Klayman.

23 So he was accusing me, he was threatening me, I'm going to
24 sue you, Barnett will sue you, Miller will sue you on all of
25 those charges because you are defaming me. And I was not

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1 defaming him. I was -- I posted what the Florida bar filed
2 with the Supreme Court. I posted information that the article
3 in regards to his nonpayment of child support, so I was not
4 doing anything defamatory. I was providing facts.

5 Further, in his E-mail he was saying -- and that I cannot
6 participate in cases in California by entering *pro per* or
7 working with my colleague who is licensed in California. I
8 never said this. That was a lie. I never said this. I
9 provided, again, information.

10 I actually, if you look at your exhibits, I put -- in your
11 exhibit you have my post and you have here a link: Article II
12 Super PAC, 25,000 solicitation for Larry Klayman. And when you
13 click on it, this is what you get. This is what those bloggers
14 were advertising. And they stated that a case will be filed by
15 attorney Larry Klayman in Florida and in California and it
16 would be a case on behalf of -- excuse me -- on behalf of
17 specific clients.

18 And I have here, they are specifically stating -- I just
19 put a link to what the bloggers who were representing
20 Mr. Klayman were saying. Excuse me. It says here, We are
21 currently collecting for Florida case to be filed, counsel
22 Klayman; California, Barnett, Newman, et al., counsel Klayman
23 and other complaints.

24 So that's what I posted, their own advertisement where they
25 are saying two cases for counsel, Attorney Larry Klayman to

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1 represent those clients in Florida and California. I never
2 said what he is writing in his E-mail. I never said that
3 Mr. Klayman cannot participate in cases in California by
4 entering *pro per* or working with my colleagues who is licensed
5 in California.

6 I never said this. He was the one who was saying things
7 that were not true. I simply put a link to what those bloggers
8 representing him stated and that was that he, as an attorney,
9 would be filing cases for clients in Florida and California.

10 Q. Ms. Taitz, you are aware that I was entering -- strike
11 that.

12 You were aware that, for the first time, I was entering the
13 realm of challenging the eligibility of the president long
14 after you had brought all these cases?

15 A. Yes.

16 Q. And for that reason you felt very competitive with me,
17 correct?

18 A. I did not feel competitive. I provided the public true and
19 correct statements. It was not competitiveness. I provided
20 the public -- the actual -- the link to actual advertisement
21 that didn't come from me. This is the advertisement that came
22 from a group of bloggers who were representing Mr. Klayman and
23 were collecting moneys from Mr. Klayman.

24 All I did, I told the public, Here is the link, click, look
25 at this advertisement. And according to this advertisement, he

1 was supposed to file two lawsuits on behalf of clients in
2 Florida and California by February 17th. There was no case
3 filed either in Florida and in California. He is not licensed
4 in California. True and correct statements. No -- I was not
5 threatened. I provided true and correct statements.

6 Q. Are you done?

7 A. Yes.

8 Q. Look at Exhibit No. 1, first paragraph on the second page.

9 A. I don't have it.

10 Q. It is going to be up on the screen.

11 MR. KLAYMAN: By the way, Your Honor, I move to strike
12 the entire last response that it was nonresponsive.

13 BY MR. KLAYMAN:

14 Q. Reading the last sentence of the first paragraph on the
15 second page, "I told her -- "you meant Connie Ruffley, right?"

16 A. Excuse me, where is it?

17 Q. Look at the first paragraph on the second page of
18 Exhibit 1.

19 A. I have just one page.

20 Q. It's up on the screen.

21 "I told her."

22 A. Okay. I see it. Yes.

23 Q. It's Connie Ruffley you are referring to.

24 A. Okay. "I told her."

25 Q. "That it was a hard sell."

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1 A. I told her, It was a hard sell.

2 Q. Okay.

3 A. They wrote, "It is now or never," saying, "Finally, Obama's
4 team has -- I don't see here -- has met their match, dissing
5 four years of my tireless work in the process. And in the end,
6 nothing, nothing was filed by Larry Klayman. It is not clear
7 what happened to all of -- I can't see here -- of the moneys
8 that was raised who got it." Absolutely.

9 Q. Okay, let's back up. "Dissing four years of my tireless
10 work in the process."

11 A. Yes.

12 Q. You were very resentful that another lawyer was coming in
13 to bring cases challenging the eligibility of the president?

14 A. No, I was not resentful. As a matter of fact, I felt that
15 it was good to bring another lawyer who would have actually
16 done the work. The issue was that they made this hard sell,
17 multiple individuals were pushing to raise money and the
18 lawsuits were not filed. And based on what Ms. Ruffley told me
19 and then I checked with California bar, Mr. Klayman was not
20 even licensed in California. And according to that
21 advertisement, he was supposed to file a lawsuit on behalf of
22 clients in California.

23 The advertisement did not say that they are looking for an
24 attorney in California to file lawsuits and then motion the
25 judge to add Mr. Klayman. They were raising money specifically

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1 stating Counsel Klayman for Barnett and Newman, those
2 plaintiffs in California. And there had to be an explanation
3 to the public stating that Mr. Klayman is not licensed in
4 California and if he wanted to join cases, they needed to bring
5 an attorney licensed in California.

6 Q. Now, Ms. Taitz, in order for you to bring your lawsuits,
7 you were raising money on your web site to pay for them,
8 correct?

9 A. I did not raise money before bringing the lawsuits. I
10 actually brought lawsuits -- I have done a lot of work pro bono
11 and I did put a PayPal button on my web site and I told the
12 public here, I have ongoing lawsuits and it would be greatly
13 appreciated if the public will help me pay the expenses in
14 ongoing lawsuits.

15 With Mr. Klayman it was different because it was a large
16 group of bloggers who had this advertisement asking for money
17 because they said there will be lawsuits filed by specific
18 date. And the date came and went; lawsuits were not filed.

19 So it was a legitimate issue to bring to the public and to
20 the donors that this money was collected and -- from
21 Mr. Klayman and lawsuits were not filed. And as a matter of
22 fact, I did not state that Mr. Klayman was the one who had the
23 money. I said, There has to be an accounting to find out what
24 happened to the money, who got it.

25 Q. So you were resentful that money donated to me for

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1 eligibility lawsuits wasn't going to go to you, right?

2 A. Absolutely not. No. Actually, I would like to have
3 another attorney join the case and be successful because if
4 there is an attorney who is successful in a specific field, it
5 helps other attorneys working in the field. It's like, you
6 know, asbestos litigation when one attorney won and was
7 successful, then there is a precedent for other attorneys.

8 I simply brought a legitimate concern that so many people
9 were raising money and they were given specific parameters:
10 Two lawsuits will be filed in two states. And they were not
11 filed. I mean, that's -- was a legitimate concern, legitimate
12 statement and as far as I know, until now, nobody knows what
13 happened to all the money.

14 There was no accounting. There was a blogger by name Helen
15 Tansey who had separate funds. She said, Well, here is Article
16 II Super PAC legal defense fund and money will go to attorneys.
17 And here is Article II Super PAC fund for education on
18 eligibility of the president. And here is another fund --
19 general fund, well, here are the three funds and you can donate
20 to either one of those funds. And nobody knows how much money
21 was donated to either one of those funds.

22 And, as a matter of fact, I wrote, if I may, actually a day
23 before and I brought what I wrote on my web site a day before.
24 On February 22nd I wrote, "I received an E-mail from Pamela
25 Barnett, who stated that Attorney Larry Klayman is no longer

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1 associated with Article II Super PAC. If Article II Super PAC,
2 meaning this woman Helen Tansey, and their Article 2 legal fund
3 are not connected with attorney Larry Klayman, they are not
4 connected with me, who are they collecting money for and how
5 much?" So I brought a very important issue that would be
6 important for the donors and for the public.

7 If you were to donate money, wouldn't you want to know that
8 a woman was collecting money supposedly for attorneys is not
9 donating to -- to attorneys for our bringing lawsuits? It is a
10 very legitimate case, a very legitimate matter. And so the
11 gist of the article that I posted that Mr. Klayman is asking me
12 about had nothing to do with Ms. Ruffley and the error that she
13 made about his child support.

14 Most of the article had to do with bloggers. It was posted
15 on the web site that dealt with legal actions that were
16 specific legal actions that were brought and I simply was
17 writing to the public and -- actually, it was a two-page
18 article where I was writing at length about all of those
19 different bloggers collecting the moneys and the public needing
20 to know what happened to all the money. That was the main gist
21 of the article, not Mr. -- not the child support of
22 Mr. Klayman.

23 Q. Ms. Taitz, as part of your activities in challenging the
24 eligibility of the president, you keep abreast of cases around
25 the country that have been filed, correct?

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1 A. Sometimes, not all of them. Some cases I do, other cases I
2 don't. There are other people who do that. There are other
3 web sites where they actually keep track of all the cases. I
4 do not do that.

5 Q. But you obviously were interested as to whether I filed a
6 lawsuit in Florida or not on eligibility?

7 A. Yes.

8 Q. Okay. And you kept track of whether I filed one and that's
9 why you claimed to have stated that I hadn't filed one, right?

10 A. By the date that they -- that you were supposed to file it,
11 you did not file. By the date that I posted the article, you
12 did not file. Later on you joined an ongoing case that was
13 filed by a *pro se* plaintiff, you substituted but that was after
14 I wrote the article and brought to the attention of the public
15 that after all of those solicitations, the cases were not
16 filed. So after the article, you filed a lawsuit, not before.

17 Q. You are sure of that?

18 A. Yes.

19 Q. Okay. I am going to show you what's been marked as
20 Exhibit 12, it's in evidence.

21 MR. KRESS: This is Plaintiff's Exhibit 12?

22 MR. KLAYMAN: Yes.

23 BY MR. KLAYMAN:

24 Q. Ms. Taitz, Exhibit 12 is a docket sheet.

25 A. Um-hmm, yes.

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1 Q. Of the case that I filed in Florida?

2 A. No, it wasn't filed by you. It was filed by a *pro se*
3 plaintiff and you -- you joined the case at a later date.

4 Q. That case was active, correct?

5 A. It -- not by you. You did not join the case,
6 Mr. Klayman -- you did not join the case when the article was
7 written. You joined the case on March the 16th.

8 Q. But the case was ongoing, right?

9 A. Look, the case was brought by a *pro se* plaintiff, not by
10 Mr. Klayman. Mr. Klayman had no affiliation with this case
11 until March the 16th. As a matter of fact, on March -- on
12 February the 22nd -- on February the 22nd I wrote on my web
13 site, So far, the only challenge filed in Florida was a *pro se*
14 challenge filed by a voter. Nothing was filed by Attorney
15 Klayman, even though it was announced that he would file and
16 moneys were solicited by Article II Super PAC and their legal
17 fund for Klayman to file challenges against Obama on the ballot
18 in Florida and California. That was February 22nd.

19 So I wrote a true and correct statement that a *pro se* voter
20 filed a lawsuit, not Mr. Klayman, just a voter filed a lawsuit.
21 And, as a matter of fact, on February the 10th when they
22 started this advertising, that's what they were saying that it
23 is not good for *pro se* voters themselves to file lawsuits.
24 They were writing -- excuse me, one second. This is the
25 advertisement by Mr. Klayman, "Once the ballots are printed in

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1 all 50 states, it will be too late. What would follow is a
2 rigged election and Eric Holder to rubber-stamp the results.
3 The best we can do then is rearguard vote challenge and battle
4 our way up the steps of the inauguration platform.

5 "We are not alone and we have an excellent opportunity to
6 succeed. We are putting together an unbeatable legal team
7 headed by Larry Klayman. He is taking our cases in his private
8 capacity -- that's how important it is to him he told us. For
9 more than three decades, Mr. Klayman was forced to their knees
10 the most corrupt of businesses and politicians, including the
11 president Bill Clinton.

12 "Plaintiffs are lined up in Florida and California and some
13 complaints have already been drawn. What we need for a victory
14 in court is your help to raise money needed to cover legal
15 expenses."

16 And they are further saying -- there is somewhere -- a
17 statement, actually, where they were saying that a person who
18 is bringing a case on his own behalf has a fool for a client,
19 which is a known statement.

20 So the whole point was -- of this advertisement that here
21 there are some cases that were already filed but were filed by
22 regular voters and we need to raise money so that an attorney
23 can substitute.

24 And so what you were trying to say, Mr. Klayman, that you
25 were -- that you already represented clients when I wrote my

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1 article, and that was absolutely not true. You joined this
2 case in Florida on March 16th, three weeks after I wrote this
3 article.

4 Q. And you are aware that I -- you don't know how much work I
5 was doing with Mr. Voeltz up to the point that I joined the
6 case, do you? You don't know?

7 A. Mr. Klayman.

8 Q. You don't know?

9 A. No, I don't know and that's not the issue here. The issue
10 was for you to represent clients and you did not become an
11 attorney for Mr. Voeltz until March the 16th, three weeks after
12 the article.

13 Q. Do you know how much work I have done for Mr. Voeltz since
14 I have entered the case?

15 A. I know that on March the 16th, Mr. Klayman joined the case
16 for Mr. Voeltz. He replaced Mr. Voeltz as a -- until March the
17 16th, four months, Mr. Voeltz was a *pro se* plaintiff; he
18 brought the case on his own behalf. A month later, Mr. Klayman
19 has joined the case and what he did, he substituted for Mr.
20 Voeltz and he substituted his complaint.

21 The original complaint was filed by Mr. Voeltz, *pro se*.
22 And what was -- and actually what happened, this Mr. Voeltz was
23 a paralegal by profession, if I -- if I recall. In his
24 complaint, he had two causes of action, one a declaratory
25 relief to declare that Mr. Obama is not eligible -- not

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1 eligible because of the problems with his IDs because the
2 problems, social security number and so forth.

3 So he had two causes of action, one had declaratory relief
4 and the other was injunctive relief which would stop Mr. Obama
5 from being on the ballot. And, actually, what happened when
6 Mr. Klayman has joined the case on March the 16th, he replaced
7 the original complaint by Mr. Voeltz with his complaint -- a
8 first amended complaint. And I don't know why he decided in
9 his first amended complaint to remove an important cause of
10 action for injunctive relief. And later on, I believe,
11 Mr. Klayman realized that he made a mistake and he filed a
12 motion with a judge asking the judge to allow him to file a
13 second amended complaint and put back the cause of action that
14 Mr. Voeltz had in his complaint to begin with and he took out
15 when he took over and the judge denied this request and the
16 case was dismissed.

17 So if anything, since Mr. Klayman joined the case on
18 March 16th, he did not help Mr. Voeltz, he made things worse.
19 Because for some reason he decided to take out an important
20 cause of action, then he tried to put it back, was not allowed
21 to the judge and subsequently the case was dismissed. And
22 that's what I know about the case.

23 Q. So you followed my activities with regard to representing
24 Mr. Voeltz?

25 A. Yes, I saw -- I saw what happened there, yes.

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1 Q. And you are aware that I filed three cases on behalf of
2 Mr. Voeltz, correct?

3 A. As far as -- technically, it was not three cases. What
4 happened, as I said, first of all Mr. Klayman has joined this
5 action by Mr. Voeltz, as I said, after I wrote the article and
6 after I highlighted the fact that the cases were not brought by
7 February 17th when they were supposed to be brought. Actually,
8 Mr. Voeltz, himself, filed the case sometime February 15th.
9 And what happened there is Mr. Klayman has joined Mr. Voeltz
10 and it was the same case but he -- the judge stated that during
11 the primary election, Mr. Obama is not technically a nominee of
12 the party, so Mr. Klayman has refiled the case later on during
13 the general election.

14 So they were not different cases, it was pretty much the
15 same case. But he refiled during general election and it was
16 dismissed again and he forwarded the same case to the court of
17 appeals. So they were not technically three cases, it was the
18 same case but, as I said, it was refiled during the general
19 election, dismissed again and then it was forwarded to the
20 court of appeals.

21 Q. There were three separate complaints filed, correct?

22 A. It was -- it was the facts of the same case but, as I said,
23 when you refile it during the general election, yeah, you can
24 state it's a different complaint, but it was the same case that
25 was refiled later.

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1 Q. Having followed so closely my activities in Florida, you
2 are aware of how much work I did, that I did a lot of work,
3 right?

4 A. Not to my knowledge.

5 Q. Okay. Well, let's put on the docket sheet of these cases.
6 I'm sure you know, given you followed it that closely.

7 A. I did not follow you that closely but to my knowledge, it
8 was not that much work. And I don't believe it even has
9 anything to do with the case at hand because this is -- we are
10 here in a lawsuit against Judicial Watch that has to do with a
11 statement which was made on February the 22nd. You joined
12 Mr. Voeltz on March the 16th, three weeks later, so all the
13 work you have done with Mr. Voeltz has nothing to do with what
14 happened on February 22nd.

15 Q. So are you saying that the only false statement in your
16 publication, in Exhibit 1, was what Ms. Ruffley told you?

17 A. Yes.

18 Q. That I was convicted for not paying child support?

19 A. Yes.

20 Q. That's the only false statement there?

21 A. Yes.

22 Q. But Ms. Ruffley made that false statement, correct?

23 A. Yes.

24 Q. And she was there on behalf of Judicial Watch, correct?

25 A. No, I told you not. I told you that she approached me, she

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1 stated that she works for Judicial Watch. She gave me her
2 business card but she did not state that she is on behalf of
3 the Judicial Watch. I don't know, maybe she was, maybe she
4 wasn't but she never said, I'm here on behalf of the Judicial
5 Watch. She never said that Judicial Watch told her to talk to
6 me. I do not know that. It may or may not be true. I just do
7 not know that.

8 Q. But she was there manning a table with materials that she
9 was handing out concerning Judicial Watch; do you remember
10 that?

11 A. No, I don't and I told you that, Mr. Klayman.

12 Q. You are aware that there are different types of crimes; are
13 you not?

14 A. Yes.

15 Q. Okay. And one type of crime is a misdemeanor, correct?

16 A. Yes.

17 MR. KRESS: Objection, she is not testifying as a
18 legal expert.

19 BY MR. KLAYMAN:

20 Q. And you don't know whether or not I was indicted for a
21 felony or a misdemeanor, do you?

22 MR. KRESS: Objection.

23 THE COURT: Overruled.

24 THE WITNESS: I read the -- I read the decision by
25 Honorable Judge Altonaga where she stated that in the state of

1 Ohio, nonpayment of child support is not a crime but a
2 misdemeanor, so I am just relying on what the judge wrote in
3 her ruling.

4 MR. KLAYMAN: Your Honor, I object to that and I ask
5 you to strike her characterization of your opinion.

6 THE COURT: That response is stricken, ladies and
7 gentlemen.

8 BY MR. KLAYMAN:

9 Q. Turning your attention to Defendant's Exhibit 6.

10 (Defendant's Exhibit No. 6 was marked for identification.)

11 BY MR. KLAYMAN:

12 Q. In your -- in Exhibit 1, which was your publication that we
13 have been talking about where Ms. Ruffley told you that I had
14 committed -- that I had been convicted for not paying child
15 support.

16 A. Yes.

17 Q. You made reference to the fact that you were only going to
18 publish what's in the public record, right?

19 A. Yes.

20 Q. Okay. I turn your attention to Exhibit -- Defendant's
21 Exhibit 6. This is a press release issued by the prosecutor in
22 Cleveland, Ohio. You have seen this, haven't you?

23 A. Yes, and I actually see that --

24 Q. Yes or no?

25 A. Yes.

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1 Q. Okay. Let me read it to you so we can have a frame of
2 reference. "Larry Klayman indicted for owing \$78,861.78,
3 Cleveland. Cuyahoga County prosecutor Bill Mason announced
4 that 15 defendants were indicted for failure to pay child
5 support."

6 MR. KRESS: I am going to object, it speaks for
7 itself.

8 BY MR. KLAYMAN:

9 Q. "These 15 defendants owe a combined \$410,404.55 in child
10 support. The charge of criminal nonsupport is a fifth-degree
11 felony which carries a maximum sentence of one year in prison."
12 You read that, didn't you?

13 A. No.

14 Q. You just said you read that, didn't you?

15 A. No, I don't have this and I never saw it. All I have is
16 what I received and what I posted on my web site. I never seen
17 this full statement and I wrote on my web site a number of
18 individuals send me this information and they did not send to
19 me this top part. The only thing that I had was actually an
20 excerpt from a publication called politicalforum.com and they
21 send me this and I wrote -- a number of individuals send me
22 this information -- "Larry Klayman, 60, of Los Angeles
23 California was indicted on two counts of criminal nonsupport.
24 He owes \$78,861.76 for his two children, ages 11 and 14. Two
25 hearings were held in domestic relations court between 2009 and

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1 2010. The last voluntary payment was made on August 30, 2011,
2 in the amount of \$1,014.25. Arraignment is scheduled for
3 February 7, 2012." So I wrote to the public, I received this
4 from a number of individuals and I posted, this was an excerpt
5 and the place from where it came I have never seen this full
6 document.

7 Q. Ms. Ruffley, in Exhibit 1, second page, Paragraph 4.

8 MR. KRESS: Is this Plaintiff's Exhibit 1?

9 MR. KLAYMAN: Yes.

10 BY MR. KLAYMAN:

11 Q. I am going to read you the portion in Exhibit 1,
12 Paragraph 4, Page 2. Okay. You write and you publish on your
13 web site, "Larry Klayman, 60, of Los Angeles, California, was
14 indicted on two counts of criminal nonsupport. He owes
15 \$78,861.76 for his two children, ages 11 and 14. Two hearings
16 were held in domestic relations court between 2009 --

17 THE COURT REPORTER: Please read slower, Mr. Klayman.

18 MR. KLAYMAN: I will read it slowly, I apologize.

19 BY MR. KLAYMAN:

20 Q. "Two hearings were held in domestic relations court between
21 2009 and 2010. The last voluntary payment was made on
22 August 30, 2011, in the amount of \$1,014.26. Arraignment is
23 scheduled for February 7, 2012."

24 Now, you took that from the prosecutor's --

25 A. No.

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1 Q. -- press release?

2 A. No, absolutely not.

3 Q. Let me finish the question. The judge has asked that I be
4 allowed to answer -- ask questions and then you have time to
5 answer.

6 You took that from Paragraph 2 of the -- Paragraph 1 of the
7 indictment of the Cleveland prosecutor that we have up on the
8 screen?

9 A. Absolutely not, Mr. Klayman. I have told you this that I
10 have never seen this document and you are telling things that
11 are totally not true. I stated that I have received from a
12 number individuals this excerpt. And this excerpt came from
13 [http://www.politicalforum.com/current-events232994-breaking-](http://www.politicalforum.com/current-events232994-breaking-democrat-files-ballotchallengeobjection-against-Obama-Florida)
14 [democrat-files-ballotchallengeobjection](http://www.politicalforum.com/current-events232994-breaking-democrat-files-ballotchallengeobjection-against-Obama-Florida) against Obama Florida.
15 This came from this article that somebody has sent to me that
16 spoke about the fact that you were, indeed -- that you were
17 indicted on two counts of criminal nonsupport and I have never
18 seen the document that you are showing here. And you are
19 simply saying something that is not true; you are just making
20 up things.

21 Q. In fact, before I even showed you the prosecutor's press
22 release, you testified before this Court under oath just a few
23 minutes before that you had seen the prosecutor's press
24 release, correct?

25 A. No, you are lying. I never said this. Show me where I

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1 said it. Please show.

2 Q. We will get a transcript.

3 A. We have -- Your Honor, can the court reporter please read
4 what I said because this is the second time Mr. Klayman is
5 telling things that are absolutely not true and he is accusing
6 me and challenging my integrity. I'm an attorney and I am
7 asking the court reporter to read back what I said. I have
8 never said that I ever saw this prosecutor's press release.
9 Never. You just made up something and accuse me of telling no
10 truth when you are the one who are not telling the truth.

11 Your Honor, may the court reporter repeat to the jury what
12 I said so the jury can see that I never stated a word about the
13 prosecutor's press release and that just -- Mr. Klayman just
14 made it up?

15 THE COURT: One can have a court reporter read back
16 testimony when it is clear what it is you are asking the court
17 reporter to read back. We would have to sit here and watch
18 Ms. McCarn peruse pages and pages of your testimony which has
19 been quite lengthy to figure out what it is you want her to say
20 you didn't say.

21 All right. Let's move on, please.

22 MR. KLAYMAN: Yes.

23 BY MR. KLAYMAN:

24 Q. I -- so the bottom line is this, the prosecutor's press
25 release said that I was indicted for a felony, correct?

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1 A. I have never seen it. You just post it here. Based on
2 what you provided me here, it says that it's a fifth-degree
3 felony; however, I don't know if Ms. Ruffley knew it's a fifth
4 degree felony. I never knew that. As I stated, a conviction
5 can be a crime, it can be a felony, it can be a misdemeanor, it
6 can be an infraction and this is the first time that I see this
7 document.

8 Q. So you were -- it wasn't correct to say that I was indicted
9 for a misdemeanor, was it?

10 A. I never said that you were indicted for a misdemeanor.
11 Again, you are making up things, Mr. Klayman. When did I say
12 that you were indicted for misdemeanor? I stated in -- here it
13 is, I stated that Ms. Ruffley actually advised me that
14 Mr. Klayman is not licensed in California. She told me that he
15 no longer works for the Judicial Watch and that donors should
16 know about litigation in Ohio where he was convicted just
17 recently of nonpaying large amount in child support. Period.

18 I never said it was a crime. I never said it was a felony.
19 I never said it was a misdemeanor. None of this. I just said
20 nonpayment of child support. I didn't -- and until now, I did
21 not know how specifically it is classified in the state of
22 Ohio.

23 Every state is different. Right now Mr. Klayman showed me
24 something saying it is a fifth degree felony, which I had no
25 knowledge, I am not in the state of Ohio. I know only what

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1 Ms. Ruffley told me that it was nonpayment of child support.

2 Never -- there is nothing here saying that this is either a
3 felony or a misdemeanor and I never said this.

4 Q. Summing up Exhibit 1, everything reported in Exhibit 1 on
5 your web site to the best of your knowledge is accurate;
6 correct?

7 A. It was accurate as far as I knew. Later on I found out
8 that Ms. Ruffley made an error, that she said that you were
9 convicted, and Mr. Klayman was not convicted of nonpayment of
10 child support. He was indicted in criminal court, he was not
11 convicted. He had three criminal contempts of court for
12 nonpayment of child support but he was not convicted in
13 criminal court. And that was one thing that in this two-page
14 article that dealt with -- that dealt with the bloggers that
15 was one word that was incorrect and when I found out, I posted
16 a correction. That was the only thing that was not correct.
17 And when I posted this article, I did not know that it was not
18 correct.

19 Q. I am going to show you what has been marked as Plaintiff's
20 Exhibit 2, which in evidence. Take your time to review that.
21 But the predicate question is this is another posting that you
22 made with your so-called correction, right? On your web site?

23 A. I did my correction February 26th. I cannot see the whole
24 thing. I see only part of it.

25 Q. We are going to show you the whole thing.

1 A. It says, "I received an E-mail from attorney Larry
2 Klayman."

3 THE COURT: I'm sorry, there is no pending question.

4 THE WITNESS: Okay.

5 BY MR. KLAYMAN:

6 Q. Take a look at the entire document.

7 MR. KLAYMAN: May I approach, Your Honor, to show her
8 the physical document? It will make it faster.

9 THE COURT: Yes.

10 MR. KLAYMAN: We can scroll it down so the jury can
11 see it, too.

12 Take your time to read it, Ms. Taitz.

13 THE WITNESS: I need it a little bit larger.

14 THE COURT: Just read it to yourself quietly. We can
15 all read it.

16 THE WITNESS: Make it a bit smaller, excuse me. Can
17 you make it a little smaller?

18 (Witness complies.)

19 Okay. I can go to the next page.

20 (Witness complies.)

21 BY MR. KLAYMAN:

22 Q. Please tell us when you are finished reading it.

23 A. Yes.

24 Q. Third page.

25 A. Where is the third page?

1 Q. We are putting it up.

2 A. Oh. Actually, I don't see the end of the -- of the last
3 page, the last paragraph.

4 Q. Okay. Let her see Page 2 again, please.

5 A. (Witness complies.)

6 Okay. Yes, I finished, I think it is Page 2. Is that
7 Page 3?

8 Q. Look at Page 3, please.

9 A. (Witness complies.)

10 Yes, okay. Yeah. So?

11 Q. Okay, so Exhibit 2 is an accurate copy of what you posted
12 on your web site --

13 A. I believe so.

14 Q. -- on or about February 26, 2012, correct?

15 A. Yes.

16 Q. And as far as you are concerned there is nothing inaccurate
17 on this?

18 A. I believe so.

19 Q. Now, I turn your attention to Paragraph 4 on the second
20 page.

21 A. Okay.

22 Q. "I read the first post I made in regards to Mr. Klayman and
23 I saw that, indeed, there was an error." That's accurate?

24 A. Yes, yes.

25 Q. "I wrote that Ms. Ruffley stated that Mr. Klayman was just

1 recently convicted of nonpayment of child support." That's
2 accurate, correct?

3 A. Yes.

4 Q. "The link and the article right under it stated that he was
5 indicted in two counts of criminal nonsupport, that he owes
6 \$78,861.76. An arraignment was set for February 23rd, 2011"?

7 A. Yes.

8 Q. And then you wrote, "So there was an error." Is that
9 correct?

10 A. Yes.

11 Q. And what you are referring to is Ms. Ruffley told you
12 something that wasn't true?

13 A. Yes, she made an error.

14 Q. Okay. Then it says "Ms. Klayman -- Mr. Klayman was
15 indicted in the state of Ohio on two counts of criminal
16 nonsupport but he was not convicted yet."

17 A. Yes.

18 Q. That's what you wrote?

19 A. Yes. I said --

20 Q. Now, you wrote I was not convicted yet?

21 A. That's right.

22 Q. Now, based on your experience, isn't one innocent until
23 proven guilty?

24 A. That's right.

25 Q. So you are telling the readers that I am going to be

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1 convicted?

2 A. No, I'm not. I am saying he wasn't convicted yet, he was
3 only indicted. And I think that the jury can make its own
4 decision. I said an error was made. Mr. Klayman was indicted
5 but he wasn't convicted yet and anybody can understand this
6 that there will be decision by a jury -- just like now, there
7 will be a decision of the jury and then we will see what
8 happens.

9 Q. So, in effect, you really weren't correcting what I said,
10 you were actually making it worse?

11 A. No, I didn't. I think -- I believe this is something for
12 the jury to decide. I made a correction. I wrote, She stated
13 that he was convicted but here is the correction, he wasn't
14 convicted. He was indicted, there was no conviction yet. So
15 it means there may be a conviction, there may not be a
16 conviction.

17 Q. So what you meant to tell the readers, the people that
18 donate to eligibility cases, because your web site is widely
19 viewed, is that I would ultimately be convicted?

20 A. No. No, I did not state that. It's just --

21 Q. And the reason -- I'm sorry, are you finished? I don't
22 want to interrupt.

23 A. I stated that an error was made because she state -- she
24 stated that Mr. Klayman was convicted. Means somebody was
25 already convicted. And I am saying no, he was not convicted

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1 yet. He wasn't convicted in the case yet, he was just
2 indicted. And anybody understands, well, the person was
3 indicted and that there will be decision by the jury. And
4 later on, from what I understand, two months later Mr. Klayman
5 had settled -- you settled the matter with your ex-wife and she
6 withdrew the complaint and the criminal case against you was
7 withdrawn. But -- and I made a correction that there was only
8 indictment but not -- there was no conviction yet. We don't
9 know what will happen and that's specifically what it says, he
10 was indicted but there was no conviction yet.

11 Q. You never spoke with my ex-wife, did you?

12 A. No.

13 Q. Okay. And you never really researched the reason that the
14 indictment was dismissed, did you?

15 A. As far as I understand --

16 Q. I guess what -- excuse me, are you finished? I don't want
17 to interrupt you. Are you finished?

18 A. No, from what I seen, quickly, there was a statement from
19 your ex-wife -- a statement or declaration from your ex-wife
20 that Judicial Watch has that there was no payment of child
21 support for a period of time. And I don't know what was the
22 settlement at the end; I do not know that.

23 Q. You, yourself, don't know? Okay.

24 In fact, what you were trying to do, Ms. Taitz, because you
25 felt competitive with me on eligibility lawsuits, was to use

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1 the false statement from Ms. Ruffley to harm me, correct?

2 A. No, absolutely not, Mr. Klayman.

3 Q. And to cut off contributions that were being raised by
4 George Miller and others to pay for my work?

5 A. Absolutely not. As a matter of fact, on the same web site
6 after I posted this article on February the 23rd, I posted,
7 actually, a comment from somebody by name Steven Struck. And
8 actually it was an E-mail and I posted it on my web site,
9 Steven Struck to Orly Taitz. Only I read two years ago and it
10 is part of the book, the name of the book by Mr. Klayman.
11 Klayman's book read -- a good book. "Larry Klayman has zero to
12 do with Judicial Watch. He actually sued the organization he
13 started. He now runs Freedom Watch. Larry is a good man and
14 honest. The whole thing is beyond fishy."

15 So, actually, I posted -- after I posted this article, I
16 posted February 23, 2012, 11:24 a.m., actually, an E-mail from
17 somebody who is saying Larry Klayman is a good and honest man
18 so this is fishy. Not only that, if you read the whole article
19 that I posted, most of the article had to do with the fact that
20 those multiple bloggers were collecting moneys. And I was
21 writing, most of the article was that there has to be
22 accountability. And, actually, I was writing the -- one
23 second. I am trying to find it -- that the public needs to
24 donate to a specific -- not to multiple bloggers but to a
25 specific attorney. One second. Let me just find it.

1 (Pause in proceedings.)

2 MR. KLAYMAN: Your Honor, if she is done, we don't
3 have any more questions.

4 THE COURT: Let's move this along, please. It's
5 almost 4:00. Is the witness coming back on Monday?

6 THE WITNESS: But, basically --

7 THE COURT: Is the witness coming back on Monday?

8 MR. KLAYMAN: No, I think we can finish today.

9 THE COURT: All right. Let's try to move this along.

10 MR. KRESS: If she is finished, then I will do a
11 cross.

12 THE WITNESS: Basically, the main part of the article
13 was that there has to be accountability. It is simply
14 unacceptable that there are multiple bloggers who are
15 collecting money and there was no accountability. And I was
16 saying if you want to donate to Mr. Klayman, to his cases,
17 donate directly to Mr. Klayman and then there is
18 accountability.

19 When you donate to multiple bloggers and when you
20 read, you can actually -- I don't know if it is in evidence,
21 the whole article -- please read the whole article and you will
22 see that the whole article writes -- speaks mostly about
23 bloggers, a whole group of bloggers who are collecting moneys
24 and there is no accountability. That was the main point of the
25 article.

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1 And, actually, I believe that it would benefit
2 Mr. Klayman or anybody else that if they want to donate to his
3 case, he has his own foundation which is Freedom Watch, he has
4 a fund, Liberty Fund, where they donate to one place and there
5 is accountability. Because with those bloggers, nobody know
6 how much the bloggers kept for themselves and how much they
7 gave to Mr. Klayman.

8 Please read this article. You have it -- I believe
9 you have the whole article and you will see that I raised an
10 important issue of public concern that had to be raised.

11 MR. KLAYMAN: No further questions until cross, Your
12 Honor.

13 MR. KRESS: Your Honor, may I give the witness a copy
14 of the exhibit book, it might be easier for her to see it.

15 THE COURT: Yes.

16 CROSS-EXAMINATION

17 BY MR. KRESS:

18 Q. Ms. Taitz, good afternoon. My name is Doug Kress and I
19 represent Judicial Watch in this matter. I am going to ask you
20 some questions. I am going to walk you through some documents
21 and try to get done as quickly as possible because you probably
22 want to get back to California, I assume, correct?

23 A. Yes. Yes.

24 Q. You flew out this morning?

25 A. Actually, I flew red-eye. I actually didn't sleep at night

1 and I am flying in the evening, flying back to California.

2 Q. Okay. And Mr. Klayman made arrangements for you to come
3 out here?

4 A. Yes.

5 Q. And how did he do that?

6 A. He asked me to appear in court to testify as to what was
7 told -- what Ms. Ruffley told me and what I posted on my web
8 site. So I came here to authenticate that what I wrote was
9 true, what was told to me.

10 Q. And, Ms. Taitz, let me ask you just, first, a few questions
11 about that February 22nd meeting, because you have testified to
12 a lot of things and I don't want to repeat it.

13 This was a regularly scheduled meeting of the California
14 Coalition of --

15 A. Immigration Reform, yes.

16 Q. Yes, thank you. And you were a speaker there one night,
17 correct?

18 A. Yes.

19 Q. And you were running for a U.S. Senate seat, I believe?

20 A. Yes, yes.

21 Q. And your opponent was there speaking, as well?

22 A. There were a number of people speaking who ran for
23 different positions. I came late, so I am not sure who else
24 spoke.

25 Q. Okay. But there were other speakers besides you?

1 A. Yes.

2 Q. Okay. And so this wasn't an event solely for you,
3 obviously?

4 A. Yes.

5 Q. So after the meeting, Barbara Coe introduced you to Connie
6 Ruffley, correct?

7 A. Yes, she approached me with Connie Ruffley. She told me
8 Ms. Ruffley specifically drove because she wanted to talk to
9 me.

10 Q. Did -- well, Barbara Coe told you that?

11 A. Yes.

12 Q. Okay. Ms. Ruffley didn't tell you that?

13 A. I don't think so.

14 Q. Was this just an informal conversation between the two of
15 you, between you and Connie Ruffley?

16 A. It was not a private conversation. It was a conversation
17 where there were other people around us. People -- you know,
18 Barbara Coe was standing next to us. There were other people
19 around. People were coming asking for autographs. So it was a
20 conversation in a public forum. It was not a private
21 conversation.

22 Q. But it was not broadcast in any way, was it? Like on a
23 microphone?

24 A. No.

25 Q. And this was after your speech, correct?

1 A. Yes.

2 Q. And it wasn't -- it wasn't a formal interview or anything
3 like that?

4 A. No.

5 Q. And so it was -- it was a casual conversation?

6 A. Yes.

7 Q. Okay. And -- it may sound like a strange question to you
8 but were you all standing up somewhere talking?

9 A. Yes, we were standing.

10 Q. Okay. No one was sitting behind a table or anything?

11 A. No, we were standing.

12 Q. Okay. And this wasn't -- you had no plans to speak to
13 Connie Ruffley that night before you got there, did you?

14 A. No.

15 Q. I want to ask you a few questions about Exhibit 1. You
16 have already testified to it but -- and this is not in that
17 book. You have alluded to this but I just want to make sure
18 it's clear. I can't get a very good focus here. You mentioned
19 that just really a small part of this article deals with what
20 Connie Ruffley said, correct?

21 A. Yes, yes.

22 Q. And, I guess, the jury can read it for itself but if we --
23 if we look here -- let me try to focus a little better -- the
24 statement with the information that Connie gave you was
25 essentially this paragraph here where my pen is, correct?

1 A. Yes.

2 Q. And you say down below that, A number of people have sent
3 me this information?

4 A. Yes.

5 Q. And this is the information about the indictment.

6 A. Yes.

7 Q. So people other -- someone besides Connie Ruffley sent you
8 that?

9 A. Yes.

10 Q. And you actually included the site to where you got that
11 information?

12 A. Yes. Where the person who sent it to me got it.

13 Q. Okay.

14 A. Somebody sent me this. I don't recall if it was E-mail or
15 comment on my web site, so I post it because it was yet another
16 source of information.

17 Q. And it truly stated that Mr. Klayman had been indicted,
18 correct?

19 A. Yes.

20 Q. And, incidentally, I think you made it clear a number of
21 times but if we look at the statement that's attribute to --
22 attributed to Connie Ruffley, it says -- it refers to
23 litigation in Ohio where he was convicted just recently of not
24 paying a large amount in child support?

25 A. Yes.

1 Q. So the information you got from Connie Ruffley didn't say
2 anything about a crime one way or another, did it?

3 A. No.

4 MR. KLAYMAN: Objection, Your Honor, it misstates.

5 THE COURT: Overruled.

6 BY MR. KRESS:

7 Q. It just merely says, convicted of -- just recently of not
8 paying a large amount of child support?

9 A. That's right.

10 Q. It refers to litigation. In your mind, does litigation
11 usually refer to civil matters or criminal matters?

12 A. I did not know exactly. I -- actually, I believe that it
13 had to do more with the civil because typically child support
14 is more of a civil matter. And it -- from what I understand
15 with Mr. Klayman, the case was in civil -- in family court and
16 there were three times where he was found in criminal contempt
17 of court for nonpayment of child support in family court, in
18 civil court and then they forwarded this to the criminal court.
19 And it was -- he was indicted in criminal court.

20 But, you know, she did not state whether it was family
21 court or criminal court. I did not differentiate. Basically,
22 spoke only about the fact that there was an issue with him not
23 paying child support for a while and the only reason it had --
24 you know, I think she mentioned this because there was an issue
25 that the lawsuits that were supposed to be filed were not filed

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1 within the specific period of time and had to do with, does
2 Mr. Klayman stand by his obligations?

3 Those two lawsuits which were supposed to be filed in
4 Florida and in California were not filed by February the 17th.
5 I brought another comment that I got from somebody stating that
6 he did not take care of a case here in Florida, and the Florida
7 bar has sued him, and he was supposed to refund the money, and
8 also this issue of nonpayment of child support. All three
9 cases had to do with the fact that there was an issue where --
10 where there was -- when Mr. Klayman did not fulfill specific
11 obligations. But when you read the whole article, that's what
12 it was, about not fulfilling specific obligations. It did not
13 differentiate, it did not state a crime -- he committed a
14 crime; just was convicted of nonpayment of child support.

15 Q. And, Ms. Ruffley.

16 A. No, I'm not Ms. Ruffley.

17 Q. I probably -- I'm terrible with that, I apologize.

18 Ms. Taitz. Or do you prefer Dr. Taitz?

19 A. Either way, it's fine.

20 Q. Okay. If you see where my pen is here, there is a
21 reference to the Florida bar case where it talks about the two
22 -- \$25,000 retainer and then there is a link below that. You
23 got this information from somewhere --

24 A. Yes.

25 Q. -- somewhere other than Connie Ruffley?

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1 A. Yes, somebody has sent me this information, either via
2 E-mail or comment on my web site that there was an issue with
3 Mr. -- with this plaintiff, this client, Natalie Humm, has
4 filed a complaint against Mr. Klayman where she paid him 25,000
5 and he didn't take care of her case. And it went to the
6 Florida bar and the Florida bar filed a lawsuit against
7 Mr. Klayman and he was supposed to refund the money within 90
8 days. And, I believe, it was not refunded within a certain
9 period of time.

10 Q. And if we look at this title here, this is the title of the
11 February 23, 2012, posting. It says, "My yesterday's
12 presentation to CCIR, an update on Article II Super PAC, Larry
13 Klayman, \$25,000 fundraising for nonexistent lawsuit affair --"

14 THE COURT REPORTER: Mr. Kress, you must read slower.

15 MR. KRESS: I'm sorry.

16 BY MR. KRESS:

17 Q. "My yesterday's presentation to CCIR, an update on Article
18 II Super PAC, Larry Klayman, \$25,000 fundraising for
19 nonexistent lawsuit affair." Does the phrase "\$25,000
20 fundraising for nonexistent lawsuit affair" refer to this
21 Florida bar matter?

22 A. No. No, it refers to the fact that all of those bloggers
23 were raising \$25,000 and their advertisement said, We need to
24 raise \$25,000, that's the retainer for Mr. Klayman, to file a
25 lawsuit by February 17th. And it was not filed by Mr. Klayman

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1 by February 17th, as promised. And, as a matter of fact, by
2 February 23rd, there was no lawsuit. That was the main issue
3 that was of concern of people who were reading my blog because
4 those were people who were following those lawsuits.

5 Incidentally, the case with Ms. Natalie Humm also dealt
6 with the same issue. Apparently, that's the retainer that
7 Mr. Klayman charges, \$25,000, and in that case also this woman
8 had filed a complaint because she filed -- she paid the same
9 \$25,000 but the case was not done.

10 MR. KLAYMAN: Move to strike, Your Honor. That is
11 nonresponsive. There is no foundation that I charge \$25,000
12 for retainers.

13 THE WITNESS: It says that in the complaint and in the
14 article.

15 MR. KLAYMAN: Lacks foundation, Your Honor. Move to
16 strike it, she has no knowledge.

17 MR. KRESS: I believe she testified that's what she --

18 THE COURT: Overruled.

19 BY MR. KRESS:

20 Q. Turning your attention now to Joint Exhibit No. 17 which is
21 the E-mail that you received from Larry Klayman. Part -- just
22 part of it is on the screen there --

23 A. Yes.

24 Q. -- and I am going to move it around a little bit.

25 You've already testified to this and you viewed this as a

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1 severe threat from Mr. Klayman, correct?

2 A. Absolutely. Absolutely. And it caused severe emotional
3 distress to me because he is saying defamation -- can you move
4 it a little bit down?

5 Q. Sure.

6 A. Yeah, he is saying subject: Defamation, false light,
7 invasion of privacy, false advertising, tortious interference
8 with business relations and other causes of action. He was
9 really trying to scare me and intimidate me. And he was
10 threatening that Ms. Miller and Ms. -- I'm sorry, that
11 Mr. Miller and Ms. Barnett are going to sue me. But
12 incidentally Ms. Barnett was saying that he was scaring them
13 that he was going to sue them. Yeah, that was clearly a
14 threat.

15 Q. Okay. I just want to refer you down to the bottom of the
16 letter. He -- Mr. Klayman demanded that you remove these
17 comments -- and not -- remove several comments from your web
18 site.

19 A. I think he wanted me to remove the whole article, the whole
20 thing and I just didn't want to -- to be intimidated by a
21 threat, by the threats. You know, I didn't want to take down
22 the whole article. I reviewed what he wrote and I saw that
23 there was just one error and I wrote a clarification and I said
24 there was just one error, here is the correction.

25 Q. Did you intend to make any false statements about Larry

1 Klayman at any time?

2 A. No.

3 Q. Looking down at this last paragraph, I believe it says
4 Mr. Klayman gives you his cell phone number and gives you 48
5 hours, basically, to take care of things. Didn't you take care
6 of things within 48 hours of this E-mail?

7 A. Yes, within 48 hours I posted a correction.

8 Q. And let's talk about that correction for -- just briefly
9 because you have talked about a lot already and I don't want to
10 reiterate too much. But the article is entitled Clarification
11 Regarding Article II Legal Fund and Larry Klayman, correct?

12 A. Yes.

13 Q. And the article actually references some -- or, you know,
14 several points that are raised, correct?

15 A. Yes.

16 Q. And there -- here is 1, 2 and those don't have anything to
17 do with the Connie Ruffley or this child support issue?

18 A. No.

19 Q. This is continuing on to, then 3, this is the Florida bar,
20 and 4 is the one with the correction, and 5 has to do something
21 else with advertising but that's not related to Connie Ruffley,
22 correct?

23 A. Yes.

24 Q. Okay. So let's look at 4. You made the correction but you
25 also note that -- let's try to fix this a little bit. You also

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1 write, "It was also self-evident in the February 23, 2012,
2 article, as I posted the link right underneath and the link
3 stated that he was indicted and arraignment scheduled."

4 A. Yes.

5 Q. Is it true that you believe that the fact that he was not
6 convicted was self-evident from the February 23, 2012, posting?

7 A. I believe so. It was -- there was an error there and there
8 was an -- I posted a link to that article where it said that he
9 was indicted, right.

10 Q. Okay. I am going to, now, walk you through some other
11 documents. It may be easier for you to look -- you can either
12 look in the exhibit book or what I put on the screen, whatever
13 is easier.

14 A. Which number?

15 Q. It is going to be 7 in the Joint Exhibit book. But before
16 I get there, your web site that you used at the time, you
17 posted frequently, correct?

18 A. Yes.

19 Q. I don't know if it was daily but probably at least every
20 two days you were posting something.

21 A. Yes.

22 Q. Take a look at Joint Exhibit 7 for a moment. And I don't
23 need you to write word-for-word -- or read word-for-word yet
24 but does this appear to be a true and correct copy of a posting
25 that you made on your web site and with the comments following?

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1 A. Yes.

2 Q. Okay? Let's --

3 A. And it says, "Great news in Florida."

4 Q. Yeah, that's what I was going to ask you.

5 A. Yeah.

6 MR. KLAYMAN: Your Honor, objection, beyond the scope
7 of direct. I never asked about Exhibit 7.

8 THE WITNESS: He specifically said Exhibit 7.

9 THE COURT: Overruled.

10 MR. KLAYMAN: I did not, Your Honor.

11 THE COURT: I will allow it. This witness is not
12 coming back next week, right?

13 MR. KLAYMAN: Excuse me?

14 THE COURT: She's not coming back next week. Let's be
15 done with her testimony.

16 MR. KLAYMAN: No.

17 BY MR. KRESS:

18 Q. Okay. So on February 11th, you actually posted, "Great
19 news, it has been reported that Larry Klayman, founder of
20 Judicial Watch, will be filing a ballot challenge to Obama in
21 Florida. I think this is great news. More challenges give
22 more visibility to the issue --

23 THE COURT REPORTER: Slower please.

24 MR. KRESS: I'm sorry. Use the microphone and slower.
25 I apologize.

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1 BY MR. KRESS:

2 Q. Let me just paraphrase it then.

3 At first you thought it was great news that Larry Klayman
4 was intending to file --

5 A. Yes.

6 Q. The challenge, correct?

7 A. Yes, it says "It has been reported that Larry Klayman,
8 founder of the Judicial Watch, will be filing a ballot
9 challenge to Obama in Florida. I think this is great news.
10 More challenges will give more visibility to the issue. His
11 challenge is expected in a week."

12 So in opposite to what Mr. Klayman accused me of, I did not
13 write something negative about him because I disliked him or
14 resented him. It's the opposite. Before I wrote this article
15 on February 11th, I wrote, "This is great news that there will
16 be somebody who" -- I thought he was still with the Judicial
17 Watch, actually, but I put "founder of Judicial Watch is filing
18 this case in Florida." So there was no animosity to
19 Mr. Klayman.

20 Q. But if you look to the next page which I have up on the
21 screen here, there is a comment from someone named Paul Jackson
22 and he writes some very negative things about Mr. Klayman,
23 correct? Take a moment to read just that paragraph, if you --

24 A. Let me see. I don't remember all the comments.

25 Yes, I see it. And by the way, I would like to state that

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1 Mr. Miller, who was collecting money for Mr. Klayman, actually,
2 a couple of times E-mailed me and he said, you know, Some of
3 the people who posted negative comments, you know, posted
4 comments that were not nice to Mr. Klayman, would you please
5 take them down? And I actually removed a few comments that
6 were negative about Mr. Klayman that dealt with things that
7 were actually public record of his divorce, statements during
8 divorce. I actually was very nice to Mr. Klayman and I removed
9 those comments, even though they were a public record and I
10 didn't have to do it. But I, actually, was nice to him and I
11 removed those -- a number of them.

12 And, as a matter of fact, I also E-mailed Mr. Klayman and
13 Mr. Miller a number of comments that people tried to post and I
14 did not allow them. You know, I scan, I usually don't have
15 time to look at all the comments but like if I saw something
16 that was really not nice, I showed them, look this came and I
17 never posted it, I never allowed it for moderation.

18 MR. KLAYMAN: Your Honor, I move to strike,
19 nonresponsive.

20 THE COURT: Sustained. The response is stricken.

21 BY MR. KRESS:

22 Q. Let's talk about just some specific things in this
23 particular comment. This individual commented to you that
24 Mr. Klayman had sued his own mother, correct?

25 A. I believe so, yeah. I don't see -- which line? Can you --

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1 Q. Could you just read the whole thing of what --

2 A. Okay. It says Paul Jackson, February 11, 2012, 5:47 a.m.:

3 Perhaps people willing to donate to the cause should think

4 about where their money goes before jumping on the Klayman

5 bandwagon. Maybe not such great news and money that is being

6 taken right out of your pocket, \$25,000 to be exact, if it is

7 raised, for a guy who sued his own mother who was suffering

8 from dementia at the time for reimbursing for caring for her,

9 is under indictment in Ohio for criminal nonsupport of his

10 children. This dead-beat dad was banned for life from a

11 California courtroom; had his law license suspended by the

12 disciplinary board of the Supreme Court of Pennsylvania;

13 accused by Judicial Watch of misappropriating more than

14 \$200,000; and sanctioned and reprimanded by the Supreme Court

15 of Florida on behalf of the Florida bar only six months ago,

16 this stemming from the last time he -- he screwed somebody out

17 of a 25,000 retainer and who, by the way, not licensed in

18 California.

19 Yeah, I see it.

20 And by the way, I have no time to review each and every

21 comment. I didn't even remember this comment. I don't know if

22 I even read it. You know, people post comments on my web site

23 and I don't have time to read each and every comment but, yep,

24 he posted this comment.

25 Q. And this was available for the public to see, anyone who is

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1 looking at your web site, correct?

2 A. Yes, apparently.

3 Q. And there are other comments but I am going to try to move
4 things along. One thing I do want to point out to you on the
5 next page is actually the tenth comment. It looks like there
6 was this posting that someone gave you a link to this Cuyahoga
7 County -- well, they posted this same thing that you later
8 posted on the 23rd about Larry Klayman, 60, of Los Angeles, was
9 indicted on two counts of criminal nonsupport, correct?

10 MR. KLAYMAN: Your Honor, objection. That's three
11 questions, Your Honor, compound.

12 THE COURT: Overruled.

13 THE WITNESS: Well, there was -- yeah, I can see here
14 there is a comment No. 10. People post a lot of comments on
15 the web site, so this was comment No. 10 from somebody who goes
16 by name European and -- February 11th and he did provide a link
17 to -- to this proceeding against Mr. Klayman for nonpayment of
18 child support. And it says -- yeah, he did.

19 BY MR. KRESS:

20 Q. All right.

21 A. But, as I stated, I do not read all the comments. It's
22 impossible. In some articles I get 200 comments and I cannot
23 read all of them. And so many comments I just -- I don't see.

24 Q. Okay. But starting 11 days before you met Connie Ruffley,
25 before you were introduced to her, people were posting things

1 on your web site about Larry Klayman?

2 A. Well, but comments were not posted by me.

3 Q. Right.

4 A. Comments are posted by other people.

5 Q. Correct. That was my point exactly and I apologize if I

6 misstated the question. You made the posting first on

7 February 11, stating that you thought it was great news?

8 A. Yes.

9 Q. And but then people started pouring in negative comments
10 about Mr. Klayman.

11 A. Yes.

12 Q. Including comments about his child support, correct?

13 A. Yes.

14 Q. About him suing his mother, correct?

15 A. Yes.

16 Q. About his bar issues, correct?

17 A. Yes.

18 Q. All right. And if we go to Joint Exhibit 8 and I just want

19 to -- if you could take a look at it in the book and just tell

20 me if that is a true -- appears to be a true and accurate copy

21 of your web site posting from February 22nd?

22 A. February 27th?

23 Q. 22nd.

24 A. 22nd. Yes.

25 Q. It appears to be true and accurate?

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1 A. I don't -- hold on. I see here, I put -- I made the
2 posting, I received the memo from Pamela Barnett -- you know,
3 the only thing is I -- on mine, it does not show comments. I
4 printed out but on this one it says four comments.

5 Q. You have a copy that -- do you have a copy of this
6 particular posting with you?

7 A. I don't have the comments. I have just the -- the name but
8 I don't have the comments. So I don't --

9 Q. What do you show for the main?

10 A. I received -- here, I received an E-mail from Pamela
11 Barnett, who stated that Attorney Larry Klayman is no longer
12 associated with a Article II Super PAC. Actually, I just read
13 this. If Article II Super PAC and their Article II Legal Fund
14 are not connected to attorney Larry Klayman, then they are not
15 connected with me. Who are they collecting money for and how
16 much?

17 Q. So this -- and I believe you testified earlier that you --

18 A. Yeah.

19 Q. Received an E-mail from Pamela Barnett, who -- who
20 indicated that there was no longer a connection between
21 Mr. Klayman and Article II Super PAC. And that came to you
22 before the meeting at the California Coalition on Immigration,
23 correct?

24 A. Yes, it was on the 22nd, before.

25 Q. So before you met Connie Ruffley, a number of people had

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1 given you information about Larry Klayman, correct?

2 MR. KLAYMAN: Objection, repetitive.

3 THE COURT: Overruled.

4 THE WITNESS: Well, they didn't give me information.
5 They posted comments on the web site and as I stated to you,
6 Mr. Kress, I don't read all the comments. So they posted it on
7 the web site but actually I do not read all the comments of
8 every person.

9 BY MR. KRESS:

10 Q. You read some of them, correct?

11 A. I read some of them but when I met Ms. Ruffley, I did not
12 recall seeing any comments about his case in Ohio.

13 Q. But when -- before you made your posting on the 23rd, you
14 indicated that you -- and I can put it back up there for you --
15 that you had obtained information from others; a lot of people
16 had sent you information about his child support, correct?

17 A. No. No. What I said that when I -- actually, when I met
18 Ms. Ruffley, she told me about the issue of nonpayment of child
19 support and I posted it. And then I started looking and I
20 entered this information on Google. I saw that there was
21 information on Google. I started reading E-mails. I get a lot
22 of E-mails which I don't have time to read, so I started
23 reading E-mails and comments and then I saw there are issues,
24 indeed, with Mr. Klayman. And I felt that it was an important
25 issue to post for the public to see here, yes, there is an

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1 issue.

2 Q. So after you talked to Ms. Ruffley, you did some research
3 and then?

4 A. After I spoke with Ms. Ruffley, she alerted me that there
5 is a problem with nonpayment of child support, that he is not
6 licensed in California. As a matter of fact, I went home, I
7 was very surprised. I actually thought that Mr. Klayman was
8 licensed in California. So I went on the web site of the
9 California bar and checked under his last name, Klayman, Larry
10 Klayman and I did not see him as licensed. So I saw that
11 Ms. Ruffley was telling the truth, that indeed he was not
12 licensed in California and I started looking further and I
13 found E-mails and comments saying same things.

14 Q. Okay. And that's where you state here, on the monitor
15 here, "A number of individuals sent me this information"?

16 A. Yes.

17 Q. You are referring to the E-mails you received?

18 A. Either E-mails or comments, yes.

19 Q. Okay. Mr. Klayman has not sued you, has he?

20 A. No.

21 MR. KRESS: Your Honor, procedurally I don't know if I
22 need to do this or not but -- because they are Joint Exhibits,
23 but to the extent they need to be moved to admitted, I would
24 move to admit the Joint Exhibits 7 and 8 which are the
25 postings, the -- Ms. Taitz' web site.

1 THE COURT: They have already been displayed.

2 Admitted.

3 (Joint Exhibit Nos. 7 and 8 were admitted into evidence.)

4 BY MR. KRESS:

5 Q. The meeting that you attended on the 22nd, what time of the
6 day did that happen?

7 A. It was in the evening because I remember I worked I -- as I
8 stated, I am both a doctor of dental surgery and an attorney so
9 I worked in my dental office until 5 o'clock. And I drove to
10 Garden Grove, which is about an hour drive, so I was there at
11 the earliest maybe 6:00, maybe 7:00 in the evening.

12 Q. Did you come to learn that Mr. Klayman also filed or became
13 involved in eligibility litigation in Alabama?

14 A. Yes.

15 Q. And was that after he became involved in the Florida
16 litigation; if you recall?

17 A. Probably, around the same time.

18 Q. Okay.

19 A. They -- they -- no, actually later. No, I'm sorry, it was
20 filed later. Our Obama case was filed at the end of 2012, and
21 actually it was filed by two Alabama attorneys. The case was
22 dismissed, it went on appeal and Mr. Klayman joined that team.
23 They filed an appeal sometime end of 2012 beginning of 2013 and
24 it was dismissed just recently.

25 Q. Okay. Thank you. No further questions.

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MR. KLAYMAN: No further questions, Your Honor.

THE COURT: Thank you, Ms. Taitz. You are excused.


(Witness excused.)

(The proceedings excerpt adjourned at 4:21 p.m.)

C E R T I F I C A T E

I hereby certify that the foregoing is an accurate transcription of the proceedings in the above-entitled matter.

06/03/14
DATE


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(305) 523-5518

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