

In The Matter Of:
State of Florida v.
Quinn McCoy Robertson

Deposition of Charles 'Chaz' Galloway
October 27, 2025



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Min-U-Script® with Word Index

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
IN AND FOR WALTON COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.
662025CF000122CFAXMX

QUINN MCCOY ROBERTSON,

Defendant.

_____ /

UNOFFICIAL
DOCUMENT

DEPOSITION OF: CHARLES "CHAZ" GALLOWAY

ON BEHALF OF: Defendant

DATE: October 27, 2025

TIME: 9:14 a.m. - 11:00 a.m. CST

PLACE: Office of the State Attorney
527 Highway 90 East
DeFuniak Springs, Florida 32435

REPORTED BY: RACHEAL L. CALLAHAN, FPR
Stenographic Court Reporter
Notary Public
State of Florida at Large

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1 COURT REPORTER: Do you solemnly swear or
2 affirm to tell the truth, the whole truth, and
3 nothing but the truth?

4 THE WITNESS: I do.

5 CHARLES "CHAZ" GALLOWAY,
6 was called as a witness and, having first been duly
7 sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MS. BOGENSCHUTZ:

10 Q I'm going to start off because Mr. Webster hit
11 some traffic.

12 A Okay.

13 Q Have you ever done a deposition before?

14 A Huh-uh.

15 Q Okay. That's the first one. If you say
16 huh-uh and shake your head, everybody in this room knows
17 you said no.

18 A Okay.

19 Q But she can only write down U-H-U-H, and in
20 five months we're not going to know if it was a yes or a
21 no.

22 A I understand.

23 Q So I'm going to pipe up and say something like
24 is that a yes. And it sounds really rude, but it's
25 because --

1 A I understand.

2 Q -- we want to know what you said. The other
3 thing is nothing we ask in here is personal. We ask a
4 lot of probing questions.

5 A Right.

6 Q So just be prepared for it. It's not a
7 personal attack on you. The other thing is that, like,
8 you know, if you go home tonight and -- I call them
9 shower thoughts or dog-walking thoughts -- and you feel
10 like, oh, I really should've said this, we're just going
11 to ask that you contact the prosecutor and tell him that
12 because if there's any material change in your testimony,
13 we want to know that before we go forward in this case.
14 Does that make sense?

15 A Yes.

16 Q And a lot of times people are really stressed
17 out when they're coming to a depo.

18 A Right.

19 Q It's not fun to do.

20 A Sure.

21 Q So occasionally, you know, our minds kind of
22 narrow down to a little point. Okay?

23 A Okay.

24 Q Yeah?

25 A Yes.

1 Q Okay. So how old are you?

2 A Thirty-eight.

3 Q Okay. And how long have you lived in Walton
4 County?

5 A I was born here and so most of my life. I
6 haven't lived here consistently.

7 Q Where else have you lived?

8 A Tallahassee, Florida, and Pensacola, Florida.

9 Q Okay. And what years were you in Tallahassee?

10 A I went to college there 2005 to 2011.

11 Q Oh, so you took the -- you did the -- the Van
12 Wilder route in college?

13 A I did, yeah. Yes.

14 Q That's not too old for you, right? So -- and
15 then Pensacola from what years?

16 A I would say around '95 to 2005.

17 Q Okay. So you maybe did high school there?

18 A Did high school there, yes.

19 Q Okay. And since graduating from FSU, moved
20 back to Walton County?

21 A I actually -- I lived in -- I forgot to tell
22 you. I lived in Los Angeles for like two years right
23 after college, and then I moved -- yes, moved back to
24 Walton County after that.

25 Q Okay. What was your major at FSU?

1 A Environmental science.

2 Q Okay. And what did you -- what kind of a job
3 did you take when you were out of college in Los Angeles?

4 A Film, film directing, photography, and things
5 like that, and that's -- that's what I did when I came
6 back to Walton County. I was a real estate photographer
7 for a long time.

8 Q Okay. And is that primarily how you've been
9 employed since then, or?

10 A I've always been self-employed. I -- real
11 creative marketing, you know, tech, working with cameras,
12 things like that. But I always freelance.

13 Q Okay. So primarily a freelancer?

14 A Always.

15 Q And --

16 A Except for I worked -- I worked for the County
17 for like three or four months. That was kind of the only
18 job I had that wasn't me working for myself.

19 Q Like a brick and mortar working for another
20 guy kind of job?

21 A Correct.

22 Q Okay. So in addition to the real estate, I
23 guess -- you said photography, right?

24 A Yes.

25 Q Did you also kind of put yourself out as kind

1 of a political consultant?

2 A Yes. Yes. More -- more recently. And I -- I
3 ran for county commissioner at one time.

4 Q Okay.

5 A And -- yeah, I put myself out as a political
6 consultant. I worked this last, what, 20- -- 2024
7 election cycle. I -- I worked for one of the county
8 commissioner candidates as a consultant.

9 Q Okay. And your work as a political
10 consultant, when did that start?

11 A Official- -- it started -- like, I volunteered
12 on some campaigns.

13 Q Okay.

14 A You know? And then the first time I ever
15 really got paid was 2024.

16 Q Okay. So it was more of a hobby as opposed to
17 a --

18 A Yeah, very much a hobby. I was just real into
19 politics and, you know, things like that.

20 Q Do you have any party affiliation?

21 A Republican.

22 Q Okay. And my understanding is that's most of
23 Walton County, right?

24 A Yes, ma'am.

25 Q Okay. When -- when you were working in the

1 2024 election, who were you working for?

2 A Chuck Wilder.

3 Q Wilder?

4 A Chuck Wilder.

5 Q And that's W-I-L-D-E-R?

6 A Uh-huh.

7 Q Okay. What -- what were you -- you said this
8 was the first time you got paid for it.

9 A Uh-huh.

10 Q What were you doing?

11 A Just -- well, I'd -- I'd run for county
12 commissioner two years before that.

13 Q In 2022?

14 A Uh-huh.

15 Q Okay.

16 A So I --

17 MR. MITCHELL: Is that yes? I'm sorry.

18 MS. BOGENSCHUTZ: Yeah.

19 MR. MITCHELL: Is that yes?

20 THE WITNESS: Yes.

21 MS. BOGENSCHUTZ: Thank you.

22 BY MS. BOGENSCHUTZ:

23 Q So he'll catch it, too. And I -- you might
24 think it's rude. We're interrupting each other.

25 A No, no.

1 Q He wants me to do it when he's asking the
2 questions, too.

3 A Yeah. Sure.

4 Q Yeah. So you ran in '22?

5 A Uh-huh. So I -- I knew how --

6 Q Yes? Yes, right?

7 A Yes, I ran in '22. So I -- I knew how
8 campaigns ran. So I got hired in '24 to just kind of
9 handle like the logistics and mostly the -- the marketing
10 outreach, yard signs, things like that.

11 Q What campaigns did you volunteer on prior to
12 you running in '22?

13 A Debbie Heard. And it was -- it was the 2020
14 election cycle.

15 Q Uh-huh.

16 A Debbie Heard and Mike Barker.

17 Q And would it be fair to say that because this
18 county tends to be primarily Republican that most of your
19 work would've been focused on August for the primary?

20 A Correct, yes.

21 Q Because the primaries would pretty much
22 determine the election.

23 A Yes.

24 Q Okay. So you volunteered for them in 2020.
25 What did you do?

1 A Social media type and video production. I'd
2 put the candidate on camera and things like that. And
3 then, you know, social media, like putting them in
4 Facebook groups, get- -- getting it so people see it.

5 Q Okay.

6 A That was kind of my specialty, was I knew how
7 to -- I had a big following on social media. I knew how
8 to get, you know, things seen to the -- the masses.

9 Q Did you have like an e-mail listserv that you
10 used as well to kind of put stuff out to followers?

11 A Sure. The -- the voter rolls are public.

12 Q Sure.

13 A You know, so you -- the first thing you do in
14 a -- in a political campaign is you do the supervisor of
15 elections where you -- there's a -- there's a piece of
16 software called webElect that kind of gives you
17 everything. It gives you all the voter records and -- an
18 e-mail -- e-mail list is -- is a primary way to outreach.

19 Q Okay. Are e-mails included in the voter
20 rolls?

21 A Yes.

22 Q And are the e-mails public record?

23 A Yes.

24 Q Okay. And that is how you obtained all the
25 e-mail addresses?

1 A Yes.

2 Q When did you do a public records request for
3 those?

4 A You use a piece of software. It's a
5 subscription service called webElect.

6 Q Uh-huh.

7 A And they -- it's -- they give them to you. I
8 mean, if you want the website, it's webElect.co or
9 something like that. You can subscribe to it. And they
10 -- they -- you know, once you sign up, it's a dashboard
11 you log into. And you can export a spreadsheet of -- of
12 every voter.

13 Q Okay.

14 A And -- and I will say not every person puts
15 down their e-mail. But the e-mail address that's in
16 there is -- you know, that's where you get them -- that's
17 where you get them from.

18 Q Okay. Do you know when they started
19 collecting e-mail addresses in the voter rolls?

20 A I -- personally, I don't.

21 Q Or when -- when that was a piece of
22 information that the government or election supervisors
23 were actually taking down about voters as opposed to just
24 phone number and address?

25 A Sure. I don't specifically know. Truthfully

1 all I know is webElect. Like, I was taught -- like,
2 everyone was told, oh, you're -- you're running a
3 campaign, you should subscribe to webElect. It's put
4 out -- it's sponsored by the Republican Party.

5 Q Okay.

6 A It's only available to Republican candidates.
7 And so -- and they have a website. You can -- I'm sure
8 all the information about that is on their website.

9 Q To your recollection the first time you used
10 webElect would've been in 2020?

11 A Yes, ma'am.

12 Q Or for that election cycle?

13 A Yes, ma'am.

14 Q Okay. Now -- and my understanding is at some
15 point you began working for the county commission or --

16 A Yes, ma'am.

17 Q -- you were employed by Walton County.

18 A Uh-huh.

19 Q When did that job start?

20 A Like late 2021 and went through to early 2022.

21 And then I -- I resigned to go run for county
22 commissioner.

23 Q Okay. And to your knowledge would you have
24 been allowed to hold that job while you ran?

25 A Huh-uh, I would not.

1 Q Is that a no?

2 A No, I would not have been allowed to.

3 Q Okay. And that was the purpose of you
4 resigning?

5 A Yes, ma'am.

6 Q Okay. When you began that job in 2021, were
7 you given any kinds of, like, county-issued electronics?

8 A Yes. I was given a computer, a laptop Mac
9 computer like yours.

10 Q Was it a MacBook Pro?

11 A It was.

12 Q And was the MacBook Pro because you were doing
13 these -- like, essentially video edits and stuff like
14 that?

15 A I'm just a Mac person. They -- they asked do
16 you like PC or Mac, and they --

17 Q Clearly.

18 A It was ordered specifically for me. It was a
19 brand-new computer.

20 Q Okay. And were you given an iPhone?

21 A Yes, a county iPhone, yes.

22 Q Okay. And do you have a personal iPhone as
23 well?

24 A Yes. And it's the same -- probably the same
25 one I had then.

1 Q Okay. Were you ever given an iPad?

2 A Not that I recall. I was not issued an iPad.
3 Now, there were -- one of my responsibilities was to --
4 to run the video production of the meetings, BCC
5 meetings. And I think there might've been an iPad that
6 we had to use to do something. So I might've logged into
7 an iPad. But I don't personally use an iPad. I wasn't
8 issued an iPad, you know, that -- that I -- that I
9 recall.

10 Q And you had mentioned you were a Mac person.

11 A Yes.

12 Q That means that all your stuff is Mac stuff?

13 A Yes.

14 Q Okay. You're more comfortable on that than
15 you are with a PC?

16 A I never owned one. Wouldn't even know how to
17 work it.

18 Q Okay. So that -- that would've been my next
19 question. It's not like you had Dells for your job or
20 anything?

21 A No, ma'am.

22 Q Okay. Are you familiar with the Find My app?

23 A Oh, Find My iPhone?

24 Q Yeah.

25 A Yes.

1 Q Okay. And you're pretty familiar with Macs
2 and --

3 A Yep.

4 Q And logging an iCloud account into a Mac?

5 A Yes.

6 Q Okay. On your Find My app did you not notice
7 that there was an iPad that was logged into your account?

8 A I did on December 19th, 2023, when my text
9 messages got read out loud in a meeting and brought to my
10 curiosity how -- how does anyone have my text messages,
11 so I went into my settings and I -- it said Jeremy
12 Rowlands' iPad was logged into my account, a guy named
13 Jeremy Rowlands. I didn't know who that was. I googled
14 Jeremy Rowlands -- Jeremy Rowlands Walton County. It
15 popped up. The -- the county staff directory popped up
16 and said that he was the technology support specialist
17 for Walton County. And so it was saying that basically
18 someone in county administration was logged into my
19 account. So I reported that to the sheriff. And from
20 what I understand that's -- they found an iPad that I was
21 logged into, and that's how this whole thing started.

22 Q Okay.

23 A Because there was -- I mean, there's no way I
24 would've -- like I said, this -- there was an incident at
25 the December 19th meeting where my text messages started

1 getting read out and then I -- we had no idea how anyone
2 had those if I hadn't in my settings seen that Jeremy
3 Rowlands' iPad was logged into my iCloud account.

4 Q You have -- do you -- do you have a personal
5 Mac or a -- like a MacBook Air or a MacBook Pro --

6 A Yes.

7 Q -- something like that?

8 A Uh-huh.

9 Q And you mentioned you had a personal iPad at
10 some point.

11 A At some point. I thought originally because,
12 like -- Macs are amazing. They -- Jeremy Rowlands' iPad,
13 it was a white iPad with a -- with a actual button
14 (indicating).

15 Q And you're making a gesture with your hands.
16 Are you gesturing as though it had a fingerprint button
17 on it?

18 A Yes, ma'am, it did.

19 Q Okay.

20 A And I used to have an iPad like that. So my
21 first thought was maybe I left some personal iPad when I
22 worked here. I think I found out that that was
23 incorrect, that the -- the iPad in question was actually
24 a county-issued iPad. I really don't know about that
25 iPad. I just know someone was logged in, and they

1 were -- I mean, this is years after I was a county
2 employee. They were monitoring my text messages
3 basically. So it was kind of -- these were personal text
4 messages that were -- been reading out. It wasn't from a
5 -- a county device or something, you know, so -- you
6 know, and that's just the way iPads work. They -- if
7 they're logged in, it -- it syncs -- syncs up everywhere,
8 so.

9 Q Let me go back to what I was asking. You have
10 a personal MacBook --

11 A Yes.

12 Q -- that's -- that's yours --

13 A Yes.

14 Q You know, that wasn't issued by the County.
15 You bought.

16 A Correct, yeah.

17 Q And you've got a personal iPhone that wasn't
18 issued by the County. Obviously it's sitting right here.

19 A Correct. Right here.

20 Q Do you have AirPods?

21 A Yeah.

22 Q Do you use the Find My app to find your
23 AirPods sometimes when you misplace them?

24 A I have not as of yet, no.

25 Q And you never use your phone to look for your

1 Mac?

2 A I've never -- I've never lost any device.

3 Q Well, that's not a hundred percent true,
4 right? Because you had an iPad that went missing, didn't
5 you?

6 A Yeah, I used it. Yes, I used it so little
7 that I didn't even know it was missing. I mean, that was
8 how much I don't use an iPad.

9 Q Okay.

10 A Yeah.

11 Q So -- but you never went to go look for it on
12 the Find My app?

13 A No.

14 Q Did -- was it added into your Find My app?

15 A Not -- not that I'm aware of. I've -- I've
16 never -- I don't think I've ever even used the Find My
17 app because I've never had to find anything. I'm just
18 aware of what it does.

19 Q Okay. But you looked into it when you saw
20 Jeremy Rowlands' iPad, right?

21 A I know this will help me explain it. What I
22 did was I went into settings (indicating).

23 Q Okay.

24 A Click your account. And it shows you right
25 there everywhere is logged in. So it said Jeremy

1 Rowlands' iPad.

2 Q Right.

3 A Right there (indicating).

4 Q Okay.

5 A So that's -- that's all I did.

6 Q And what was the serial number for the iPad
7 that was missing that was yours?

8 A I have no earthly idea.

9 Q So what -- what I'm confused by here is that
10 you kind of typed out a formal complaint. Do you
11 remember that?

12 A To the sheriff's office?

13 Q Right.

14 A At the time I thought it was my old iPad. And
15 as -- I think -- I mean, since -- since writing that I
16 have -- like, the sheriff and FDLE told me that, no, it
17 wasn't your iPad. So I -- I apologize. I was -- I was
18 incorrect. When I reported it, I thought it was my iPad.
19 Because -- because at the time, like I said, I didn't --
20 I didn't know how it would've been possible that -- the
21 only iPad I ever had was this old white one, you know,
22 and I didn't know how anyone would've been logged into my
23 account, you know, other than me.

24 Q So --

25 A I would've had to have done it. I was --

1 Q What -- what you're saying is it's -- you
2 weren't lying in here. You believed it to be true --

3 A Yeah.

4 Q -- at the time you wrote it?

5 A I believed that that was my iPad.

6 Q Okay. Why would you write the serial numbers
7 can substantiate this claim if you didn't know that to be
8 true?

9 A I would --

10 Q Would you like to see it?

11 A Yeah. No, I know what you're talking about,
12 and I can -- I know what you're saying. I know that
13 every county device that is purchased, because I worked
14 there -- like, if -- if it was a county iPad, they would
15 have registered the serial numbers. So essentially they
16 could prove that it wasn't a county device. And I think
17 that's how they proved that it was a county device. I
18 don't -- I never had any serial numbers of mine. I was
19 saying that they would be able to prove -- like you'd --
20 you'd be able to prove that it was a county device
21 because the County actually keeps track of serial
22 numbers. I mean, I -- I -- I have never kept track of
23 serial numbers.

24 Q Well, why would you say the serial numbers can
25 substantiate this claim when you're referring to a

1 personal iPad you're alleging was stolen?

2 A I guess it -- it was a typo. I mean, I -- I
3 don't -- I don't know spec- -- what I meant was that the
4 County keeps track of serial numbers. So if they don't
5 have -- if they find the iPad and it's not a county iPad
6 -- because they keep track of that -- then they would be
7 able to prove that it's not -- it's not a county device.

8 Q But you -- the way that I'm reading this is
9 you seem to be saying that the serial numbers would be
10 able to substantiate the claim that it was your personal
11 iPad that had been stolen.

12 A I mean, I -- I guess I was incorrect in saying
13 that. I admit that on the record.

14 Q Did you pull up your information when you
15 bought that iPad?

16 A No. I bought that a long, long time ago, like
17 maybe eight, ten years ago. Like, there's -- and I'm not
18 one that keeps track --

19 Q Where did you buy it from?

20 A I think I probably bought it online or
21 something like that. I -- I don't -- and I'm not a
22 person that keeps track of serial numbers, so I --

23 Q Well, Apple does, don't they?

24 A I'm not -- I don't know. Probably.

25 Q Have there been -- how many prior iPads have

1 you had?

2 A One or two, I guess. I don't know. It's not
3 something that I use a lot.

4 Q Okay.

5 A But there's pieces of equipment that I've had
6 from my business that required an iPad for use, so may-
7 -- so I purchased one.

8 Q Did you report the iPad stolen to Apple?

9 A No.

10 Q Did you report the iPad missing?

11 A Missing to -- to who? Like -- you mean like
12 to the -- to the sheriff or something like that?

13 Q To Apple --

14 A Oh, no.

15 Q -- so that when somebody else logged into it,
16 they would get a message that said --

17 A No. No.

18 Q -- Chaz Galloway is missing this iPad?

19 A No, I did not.

20 Q Okay. And so is that personal iPad still
21 logged into your iCloud account?

22 A No, I -- I changed the password, so it's not
23 -- it's no longer -- it's not on there anymore.

24 Q Okay. Did you use that personal iCloud
25 account to log into the MacBook Pro?

1 A Not that I recall. I -- I -- it's been a long
2 time since I've worked for the County, but I -- I think I
3 created a separate -- I did. I created a separate iCloud
4 account with my county e-mail for county business on my
5 county MacBook Pro.

6 Q Okay.

7 A For obvious reasons.

8 Q To segregate --

9 A Separate, yeah.

10 Q Okay. So why would you log in with your
11 personal info on a county iPad?

12 A I'm not even sure if I'm the one that logged
13 in because -- there -- there was -- Jason --

14 Q Do you have any reason to think that somebody
15 else logged in?

16 A Yes.

17 Q What?

18 A Jason Cook, the IT guy, when he was -- after I
19 had worked for the County he reached out and there was
20 something that I was logged into or something like that,
21 and he -- he needed the password. I -- I -- I gave him
22 the password.

23 Q You gave him your password?

24 A From what I recall.

25 Q To your iCloud account?

1 A Uh-huh.

2 Q Is -- is that a yes?

3 A Yes.

4 Q Okay. Sorry. So you gave him the password to
5 your personal iCloud account?

6 A I recall a conversation between me and him,
7 and it's very foggy, but he needed to log into something,
8 and I didn't even work for the County anymore, and I
9 just -- I think I texted him, like, Hey, here it is, you
10 know.

11 Q Via text?

12 A Yes.

13 Q Okay. I'm not asking you to give me your
14 password, but is it your general, I guess -- for example,
15 my mother uses the same password for everything, and it
16 drives me crazy.

17 A Yeah, uh-huh.

18 Q Do you change up your passwords?

19 A No.

20 Q Are they --

21 A No, it's exactly the same.

22 Q Okay.

23 A In fact -- yeah, I always use the same
24 password.

25 Q For everything?

1 A Yeah.

2 Q Okay. And you gave that password to Jason
3 Cook?

4 A Uh-huh. Yes.

5 Q Thanks. And your recollection is you did that
6 via text message or in writing somehow?

7 A Recollection is text. Yes, yeah, I did text.
8 It was a text message, yes.

9 Q Okay.

10 A And it was after I worked for the County.

11 Q After your -- after your employment concluded?

12 A Uh-huh.

13 Q Okay.

14 A Yes.

15 Q Okay. So were you expecting Jason to use that
16 information to log out of the iPad, or what was that
17 discussion like that you recall?

18 A I -- there wasn't one. I just said here's my
19 password. I -- I -- you know, truthfully I never -- I
20 don't really have any -- I don't protect my privacy as
21 much as I should.

22 Q It's -- yeah.

23 A I didn't really worry about it until I started
24 hearing my text messages being read out in a public
25 meeting. And -- and that was -- I mean, truthfully the

1 -- if I recall Jason -- I think I might've wrote that in
2 there. The -- the -- the way I knew there was, like, a
3 device logged in at the County -- about six months before
4 this happened I think Jason --

5 Q But when you say this happened, you mean
6 before the -- the meeting --

7 A December 19th, 2023.

8 Q Okay, before the meeting situation.

9 A Yes. Yeah, he reached out and said that there
10 was a device that was -- I was logged into, and I think
11 he maybe even wanted me to come up here and log out of it
12 because you need the password, and I think I just gave
13 him the password.

14 Q Okay.

15 A So that was how I knew. You know -- I mean,
16 it was a pretty far-fetched thing reporting all this
17 stuff. But the -- the way I knew that there was clearly
18 a device logged in with me and that's how they were
19 getting my text messages, because I remember Jason Cook
20 reaching out and saying there is an iPad up here that
21 you're logged into. Can you come up here and log out of
22 it? And I think I was away, out of town or something. I
23 just -- I couldn't -- I couldn't do it. And so I just
24 said here's the password, log out.

25 Q Okay.

1 A You know, we were -- we were friendly, I mean.
2 And it wasn't -- I'm a trusting guy. And I didn't -- and
3 I had nothing to hide. I just -- I didn't think my
4 personal text messages would, you know, ever be of
5 interest to anybody.

6 Q Okay. And -- I mean, at the time you're
7 saying you trusted Jason Cook?

8 A Yeah.

9 Q Do -- do you think that he used that
10 information to log into the iPad at that time, or?

11 A I am -- I'm not sure what -- what he did with
12 it. I just know that the Walton County Administration
13 was in possession of an iPad that was syncing all my
14 stuff up to it. And that was six months prior to
15 December 19th. So that was --

16 Q Okay.

17 A So that's when it -- it kind of clicked on
18 December 19th when I was saying to myself how in the
19 world are they reading my text messages. It's like, oh,
20 yeah, Jason reached out about some iPad that was syncing
21 all the data.

22 Q Do you recall giving a statement in this case
23 to, like, the Walton Sheriff's office or FDLE?

24 A Uh-huh. Yes.

25 Q Okay. Do you recall saying something to the

1 effect of I didn't come down to log out because I thought
2 it was a setup?

3 A I think I did -- yeah, I did say that, yeah.

4 Q Okay. So your testimony here today is that
5 you gave that password that is your universal password to
6 Jason Cook so you wouldn't have to come down and log out
7 because you thought it was a setup?

8 A In my paranoid brain I thought that there was
9 some device that they had found something on and they
10 were trying to, like, say, like, is this yours or
11 something. So I just didn't -- I don't know -- I did not
12 want to, like, have anything to...

13 Q What would you be afraid of them saying was on
14 the device?

15 A I -- who knows? I mean, Walton County,
16 small-town politics, like, it's -- it's a lot of, you
17 know, backstabbing, things like that. It just wasn't --
18 I was -- I think I was running for county commissioner at
19 the time so it was just -- it wasn't something that I
20 wanted to...

21 Q Okay. How do you know Joseph Turner?

22 A I've never met Joseph Turner. I just know he
23 was a public servant working for the -- for the county
24 administration and, you know -- I mean...

25 Q Have you sent out e-mails with his name in it?

1 A I think we were doing editorials criticizing
2 his -- we had found some things from his past. Like,
3 he's been -- we found some public articles written about
4 him from prior to him working here and we...

5 Q Who's the we?

6 A Well, me.

7 Q The royal we?

8 A I mean, it was me writing them. You know, I
9 mean, it -- I guess -- you know, you have, like,
10 political...

11 Q Which commissioner were you working with?

12 A I was not working with any commissioner.

13 Q Okay. So when you say we, it was just you?

14 A That sent it, yes.

15 Q Who participated in doing the background on
16 Joseph Turner?

17 A A friend of mine named Robert Nelson.

18 Q Okay. And he's deceased, correct?

19 A Correct, yes.

20 Q Okay. He died, what, '24?

21 A Yeah.

22 Q Something like that?

23 A Uh-huh. Yes.

24 Q I'm sorry about that. Was it -- was it
25 cancer?

1 A No. It was a brain -- brain tumor.

2 Q Oh, okay. I didn't --

3 A Yeah.

4 Q But a similar -- yeah, just one of those
5 things.

6 A Yeah.

7 Q So you and Robert Nelson were doing this
8 background on Joseph Turner?

9 A I mean, if you call it background. There were
10 just some articles about him that were very -- I think he
11 had been involved in some kind of extreme political --
12 what seemed like extreme political stuff, and we were
13 pointing out that he knows this -- you know, is this
14 worthy of -- of, you know, the job that he's in?

15 Q Did he discuss that with any of the current
16 county commissioners?

17 A No.

18 Q Did any of them have any input?

19 A No.

20 Q And what was Robert Nelson doing for a living
21 at that time?

22 A He -- he ran a business called Tech Planet
23 right here (indicating). He's a local IT person. He had
24 a brick-and-mortar store right here in downtown.

25 Q And you're gesturing over your shoulder like

1 it's a street over, right?

2 A Very close. Very close to this office, yes.

3 Q Okay. And was he the sole proprietor of that
4 business or --

5 A Yes.

6 Q -- did anybody else --

7 A Yes, he was the sole...

8 Q Did he have a YouTube channel?

9 A Probably, but I'm not -- not that -- not --
10 not that he, like, put his name and face on.

11 Q What does that mean, like a secret one? Or
12 one that he didn't publish as his own?

13 A Correct. I -- I -- I do not know if he had
14 one or not.

15 Q Okay.

16 A I wouldn't be surprised, though, because a few
17 years before this we -- we had a local television show
18 that me and him were on, you know, that he would publish
19 things to YouTube, so.

20 Q Okay.

21 A I would imagine.

22 Q And what account would that have been on?

23 A I have no idea.

24 Q Okay. But certainly one of his YouTube
25 accounts?

1 A Yes.

2 Q Do you have a YouTube account?

3 A Yes, I do.

4 Q Okay. Currently?

5 A I suppose so. I haven't used it in many
6 years, but I'm -- I'm sure if I opened it up, it would --
7 I'd be logged in, yeah.

8 Q Okay. When -- we're going back to this Jeremy
9 Rowlands iPad.

10 A Uh-huh.

11 Q When -- when did you -- did you ever check to
12 see if Jason Cook logged out?

13 A I did not, no.

14 Q You just trusted him to do that with your
15 password?

16 A Yes, I -- like I said, I've never been -- I
17 don't lock the doors of my car or my house either. Yes.

18 Q Okay. And -- now you -- what I'm -- what I'm
19 trying to square here is that you were concerned enough
20 to say I was afraid I was getting set up because I
21 thought there was something on this iPad that they were
22 trying to pin on me, but you'd still give somebody in
23 Walton County government your universal password.

24 A Right.

25 Q And then not check that they did the thing you

1 thought they were going to do.

2 A What -- what is the question again?

3 Q I'm just saying it doesn't quite make sense to
4 me. Can you help me make it make sense?

5 A No, I don't think so.

6 Q Okay. I wasn't sure if there was another
7 explanation that you had.

8 A No.

9 Q Okay.

10 A No.

11 Q And what's your relationship with Teresa
12 Lowery?

13 A She's a friend, good friend of mine.

14 Q How long have you known her?

15 A Since probably 2020.

16 Q Okay. So since you were looking into getting
17 a -- well, since 2020.

18 A Since I became politically active.

19 Q Okay.

20 A She was -- she works for Danny Glidewell. You
21 know, so any -- if you -- you know, if you ever have a
22 meeting with Danny Glidewell, you have to go through her.
23 And her mother --

24 Q She's the gatekeeper?

25 A Correct.

1 Q Okay.

2 A She's -- her mother taught me in kindergarten
3 as well, so.

4 Q Is her mother still around?

5 A Uh-huh. Yes.

6 Q Very nice. So your relationship with Teresa
7 Lowery -- you said you've only known her since 2020,
8 though.

9 A Uh-huh. Yes.

10 Q So you didn't know her in the context of your
11 kindergarten teacher's daughter?

12 A No, but that's -- that's why we've kind of
13 became close because, you know, we -- family history.

14 Q Okay, gotcha. Why did you -- who got you this
15 job with the -- with Walton County?

16 A I applied on the website and went through the
17 interview process.

18 Q Okay.

19 A And it was a very -- very intensive process,
20 interviews, things like that.

21 Q How many interviews were there?

22 A Two, I think, with, you know, a big panel of
23 -- they do it by committee. You know, there's a process
24 to hiring. It's not -- like, one person does not have
25 authority over that. There's a hiring committee.

1 Q Okay. And who was on this hiring committee?

2 A Jason Cook was. I believe Dede Hinote, Mary
3 King, and I think a couple of others, but I don't
4 remember who they were.

5 Q Okay. So Teresa Lowery works for Danny
6 Glidewell?

7 A Yes.

8 Q Do you know if her communications are
9 considered public records?

10 A Her personal?

11 Q Well, I mean, if they're about county
12 business.

13 A I'm not -- I'm not an attorney or I don't know
14 anything about what is public record. I mean, I'm not an
15 expert on that.

16 Q Well, I mean, did you go through any trainings
17 or anything like that when you were a Walton County
18 employee?

19 A No, I should've. They -- they -- they don't
20 train very much there.

21 Q Do you recall signing a statement that you
22 were given a copy of the Walton County Employee Handbook?

23 A I don't recall, but there's a good chance that
24 I did. I mean, that sounds like something normally you
25 would do.

1 Q Okay. Are you aware that there's a statement
2 in there that says you have no expectation of privacy on
3 any county-owned device?

4 A County-owned device? I was not aware of that,
5 no.

6 Q Okay. So you signed the statement for the
7 handbook without reading it?

8 A Yes.

9 Q Okay. Who's Alan Osborne?

10 A Alan is -- how would I describe Alan Osborne?
11 He is a local political -- he's a lot like me. He's an
12 independent citizen who is very involved in politics,
13 does a YouTube channel, things like that.

14 Q Okay. In the summer of 2024 were you
15 arrested?

16 A Yes.

17 Q What were you arrested for?

18 A Criminal mischief. I kicked a political yard
19 sign and --

20 Q Also a DUI too, right?

21 A Correct. That was thrown out.

22 Q And a possession of a controlled substance?

23 A Right. It was a prescription substance. I
24 just didn't have the prescription on me, and they threw
25 them out.

1 Q Okay. Well -- so here -- my question is, you
2 know, that -- I understand why they threw the possession
3 of a controlled substance out. What I don't understand
4 is why they threw the DUI out. Can -- do you understand
5 -- or can you explain that to me?

6 A I wasn't -- it wasn't alcohol. It was -- it
7 was driving under the influence of this ADD medication.

8 Q Okay.

9 A And it's not a -- it's not a -- it's not a
10 drug that makes you belligerent or impairs your driving.
11 I was a little shocked that they charged me with a DUI.
12 And it's -- I would assume that's why they threw it out
13 because it -- I wasn't drinking. I wasn't drinking. I
14 just -- they -- they found my ADD medication on me and I
15 didn't have the bottle with me. When I -- when my
16 attorney produced -- showed that I had a prescription,
17 they threw all that out.

18 Q Well, let me give you an example. Let's
19 hypothetically say I'm prescribed Xanax by my doctor and
20 it's a legitimate prescription. That doesn't mean I get
21 to take ten of them and drive a car, right?

22 A Yeah.

23 Q So me producing that prescription doesn't
24 change whether I was under the influence to the extent my
25 normal faculties were impaired.

1 A Okay. I guess Adderall is a -- you're
2 supposed to take it daily to go about your daily life and
3 drive. I mean, I don't -- I don't think it -- I don't
4 think people look at that as something that you're not
5 allowed to drive on. I mean, I don't -- because you
6 wouldn't be able to -- it's for ADD. I mean, if
7 anything, it's supposed to sharpen what you -- it
8 sharpens your -- I mean, my -- when I told my doctor
9 about it, he said I -- I wouldn't want you to be off of
10 it driving.

11 Q So is it fair to say that you were on the
12 appropriate dose of medication when you were kicking
13 those political signs?

14 A Yes.

15 Q Okay. Why were you kicking political signs?

16 A It was a publicity stunt. It was very
17 childish and immature.

18 Q Okay. Whose signs were they?

19 A Brad Drake's.

20 Q Okay. And is he currently a county
21 commissioner?

22 A Yes.

23 Q Okay. And why were you selecting his signs?

24 A I was very -- he was involved in -- there's a
25 big argument about the -- the beach rights down here and

1 he was -- I -- I -- I disagreed with his political stance
2 very much and...

3 Q Okay. Is there a Barbara --

4 A Barbara Morano?

5 Q Yeah.

6 A Yeah. I kicked them, yeah. It was her signs
7 as well.

8 Q Her signs, okay. Was she running for an
9 office?

10 A Yes.

11 Q What was she running for?

12 A District 5 County Commissioner.

13 Q Did she win or lose?

14 A She lost.

15 Q Okay. And were you kicking the signs prior to
16 her losing or after?

17 A No, it was before.

18 Q So you -- okay. So you -- you were kicking --

19 A It was during an election cycle.

20 Q Okay. But it wasn't -- it wasn't after the
21 actual election. It was during --

22 A It was during the election.

23 Q Okay. Do you send out mass e-mails?

24 A Did I used to? Yes.

25 Q Did you send one out in the summer of '24?

1 A Summer of 2024? Yes.

2 Q How many mass e-mails do you think you've sent
3 out?

4 A I'm not sure.

5 Q More than five?

6 A Yes.

7 Q More than ten?

8 A Yes.

9 Q More than twenty?

10 A Yes.

11 Q More than fifty?

12 A Maybe.

13 Q More than a hundred?

14 A Ever?

15 Q Sure.

16 A I mean, I've been using mass e-mail software
17 since 2020, so yeah.

18 Q Okay. What kind of software do you use for
19 the mass e-mails?

20 A Constant Contact.

21 Q Oh, Constant Contact? Is that --

22 A Yes.

23 Q Okay. Have you received complaints about
24 maybe spamming people with e-mails?

25 A If you spam too many people, Constant Contact

1 shuts you down. They have a very -- like, if someone
2 complains, you'll lose access to Constant Contact.

3 Q How many times has that happened to you?

4 A Once or twice. I don't recall.

5 Q Okay. And that app would have the records of
6 that, I would assume?

7 A Possibly.

8 Q So once or twice in the past five years you've
9 been completely shut down from being able to send mass
10 e-mails because of complaints?

11 A Uh-huh.

12 Q Is that a yes?

13 A Yes.

14 Q I did a public records request from the
15 County, and I received one of these e-mails, and it was a
16 hundred and five pages long. Does that sound right to
17 you?

18 A The e-mail?

19 Q Yes. I think it was a hundred and six
20 actually. Don't -- don't hold me to the exact number.
21 It was over a hundred.

22 A I mean, when you -- you reuse templates
23 essentially. So it's -- a lot of times when you're
24 drafting a new e-mail, you just put the stuff on the top.
25 So everything, you know, from the previous template would

1 be below, so maybe it was that long.

2 Q Okay.

3 A But -- I mean, I -- you know, I don't know how
4 long they were.

5 Q What's the purpose of sending out these mass
6 e-mails?

7 A I had a -- a blog that I sent out. Just like
8 a -- just like a newspaper, if you write a newspaper and
9 then you distribute it to subscribers. I mean, it was...

10 Q And all of these people opted in to be
11 subscribers?

12 A Yes, basically. As far as webElect -- like I
13 said, my subscriber list comes from voter records. And
14 they --

15 Q So they gave the County their e-mail address
16 for the voter roll, and then you took that e-mail address
17 and started sending them mass e-mails?

18 A Yeah.

19 Q Okay. Was there an option to opt out?

20 A Yes. Constant Contact -- by using Constant
21 Contact, you are compliant essentially. That's the way
22 Constant Contact explains it. Because it has all the --
23 if they want to opt out, they can unsubscribe. They can
24 mark it as a spam complaint. And if you're abusing your
25 right, Constant Contact shuts you down. So that's -- you

1 can't really send mass e-mails without using something
2 like Constant Contact.

3 Q When's the first time that you said that you
4 gave Jason Cook your -- your password to log out? Is it
5 today?

6 A When's the first time?

7 Q Yeah, did you ever tell the police that?

8 A I don't remember if I told them that or not.

9 Q Okay. These mass e-mails, you said they were
10 like a blog, like a newsletter?

11 A Yes.

12 Q Is -- did you write an open letter to the FBI
13 on it?

14 A I possibly could've. I mean, we -- a lot of
15 the stuff I do is like satire, very satirical.

16 Q Okay. What is -- it's possible that I'm not
17 understanding, but what's --

18 A I wrote a lot of content. I -- AI, I use it
19 -- AI writes all this stuff nowadays. It's how -- so --

20 Q Did AI write this in 2024 for you?

21 A More than -- yes, more than likely, yes.

22 Q Okay.

23 A Because, I mean -- truthfully I'm not a good
24 typer. There's -- you know, most of -- AI wrote that --
25 that testimony to the sheriff, you know. Like, I mean,

1 it's -- it's just a tool that allows you to write.

2 Q Okay. Part of this is -- and I'll just read
3 it to you, "To whom it may concern, my name is Charles
4 Galloway. I'm an investigative journalist, political
5 activist, and local politician in Walton County, Florida.
6 For nearly five years I've been working on a highly
7 controversial story that has encountered significant
8 corruption within the local Walton County government."
9 Can you tell me about that?

10 A I don't remember that specifically, but it
11 sounds like something that -- I mean --

12 Q Well, it sounds like -- if you've been working
13 on it for five years and you can't tell me about it.

14 A Yeah. I -- I don't know.

15 Q Okay. Let me continue. "As a result of my
16 investigations I've become the target of harassment by
17 government officials and influential local business
18 owners. I have substantial evidence that I was placed
19 under illegal surveillance by the local government. This
20 was confirmed by Officer Keith Riddick of the Florida
21 Department of Law Enforcement, FDLE, who informed me that
22 two Walton County officials are expected to plead guilty
23 to third-degree felonies related to this unlawful
24 surveillance." Did Keith Riddick say that to you?

25 A Yes.

1 Q He told you last summer before there were even
2 arrest warrants typed up that these two were going to
3 plead guilty?

4 A I don't remember the specific words that he
5 used. He says that he expected maybe something like
6 that. But, yeah, it was definitely implied that they --
7 I mean, when I -- when he interviewed me, is what he
8 said.

9 Q Okay. So he implied that he knew that these
10 two gentlemen were going to plead guilty before he even
11 typed up an arrest warrant, before the state attorney
12 even looked at it?

13 A From what I recall he said he expected them
14 to. And, I mean, memory is very foggy, so I want to get
15 that right, but...

16 Q Is it possible you were maybe taking some
17 creative liberties with this --

18 A Absolutely, yes.

19 Q Okay. "Additionally, I have documented
20 approximately two dozen other incidents of harassment and
21 misconduct." Can you tell me about those?

22 A No. There's -- there's no telling what -- at
23 that point in time I was very upset. I was writing a lot
24 of stuff.

25 Q That wasn't true?

1 A I -- I don't know if it was true. In my mind
2 it was.

3 Q Okay. Are you trying to tell me you felt
4 harassed, and thus you wrote you were being harassed?
5 And sitting here today you know you were not?

6 A Well, I mean, when my text messages were read
7 out loud in a meeting, I felt very threatened by that.
8 The local government had access to my personal data.

9 Q Okay. So the two dozen instances, that's not
10 true?

11 A I'm not sure what instances I was referring to
12 at that time.

13 Q Okay.

14 A I mean, this is just a -- it's just a blog
15 article. Or -- I don't -- I don't know.

16 Q "I am seeking an experienced attorney who can
17 represent me in a lawsuit against the Walton County
18 government." Did you get an attorney?

19 A I did. I'm no longer pursuing.

20 Q Okay. "This case involves serious civil
21 rights violations, personal injury claims, damage to my
22 career, and significant mental anguish inflicted upon me
23 and my family." Anything you can tell me about that?
24 What personal injury claims?

25 A I think personal injury is probably the --

1 well, I mean, if mental health is personal injury -- I
2 mean, I was very shaken by the incident on December 19th.
3 They had my -- my text messages and things like that.
4 I mean, I felt very harassed that they were reading my
5 private response.

6 Q Okay. And the next article is, "Should Clay
7 Adkinson and Stan Sunday be fired?" And there was a
8 video embedded.

9 A Was --

10 Q You remember anything about that, a video?

11 A Yes. And I -- part of my style is very
12 satirical. And that was a -- I -- I didn't want them
13 fired. I -- I think I -- I wrote the article to get them
14 to click on the video and then it's a video of me talking
15 about something. And I think I said I liked those guys.

16 Q Okay. So that was satire.

17 A Yeah.

18 Q But the stuff about Keith Riddick telling you
19 these guys were going to plead guilty is not satire.
20 That was truthful?

21 A Yes.

22 Q Okay.

23 A I mean, as far as -- yeah.

24 Q The next headline is, "Is Suzanne Harris the
25 Antichrist?"

1 A That's satire.

2 Q Okay. Is calling Todd Roark a fairy boy
3 satire?

4 A That's just very mean and insensitive. It's
5 satirical, but.

6 Q Okay. Is it true?

7 A No.

8 Q Okay. And the next one is, "Is Dan Curry
9 going to jail?" Who's Dan Curry?

10 A He is a county commissioner now.

11 Q Okay. Was he a county commissioner in the
12 summer of '24?

13 A No.

14 Q Okay. He was running, right?

15 A Yes.

16 Q And you put this out that he might be going to
17 jail in the midst of his campaign?

18 A It appears so.

19 Q Okay. What was the purpose of doing that?

20 A It's just First Amendment -- exercising First
21 Amendment editorial opinions.

22 Q Sure. But surely there was some truth behind
23 you saying he was going to jail, right?

24 A I -- I'm not sure. I really don't remember
25 what my thought process was at the time.

1 Q Okay. The next article is, "How I will prove
2 that Dan Curry's election was a fraud." Can you prove
3 that?

4 A I -- I can't. At the current time -- at the
5 time I thought I could. I -- there were some interesting
6 things with his campaign finances that I found -- I
7 didn't think were legitimate.

8 Q Okay. "Will Dan Curry get removed from
9 office, go to jail, get fined, or all of the above?"
10 Same thing?

11 A Yes.

12 Q "Brad Drake's supporter caught stalking
13 voters." Did you report that to the sheriff's office?

14 A No.

15 Q You know, there's -- there's specific rules
16 about campaigning on behalf of an individual, right?
17 About what somebody campaigning on behalf of a candidate
18 can do and can't do; is that right?

19 A I -- I would assume there are.

20 Q You've been a political consultant. You've
21 been working on campaigns since 2020.

22 A Yeah.

23 Q Do you not know the rules about that?

24 A Not specifically, no.

25 Q Okay. So you just suggested that somebody was

1 being stalked without even knowing what the rules were?

2 A It appears so.

3 Q Is Boots McCormick a racist?

4 A Once again, that was a article that --
5 editorial.

6 Q Let me read you the title. "Northwest Florida
7 Daily News confirms that Boots McCormick is a racist."
8 It seems to be presented as a fact.

9 A Uh-huh.

10 Q Is -- did you have any information on that
11 that you'd like to share with us?

12 A No.

13 Q Okay. So you just put it out there --

14 A Yeah.

15 Q -- without it having any truth to it?

16 A I mean, it is an opinion.

17 Q Okay. And it was an opinion that he's a
18 racist. But there's also some facts in here that say,
19 "He's got a whole arsenal of N-word jokes that he just
20 can't help but share all the time." Is that true?

21 A It's satire written by artificial
22 intelligence.

23 Q So you didn't even write any of this?

24 A No.

25 Q And you were putting this all out as facts?

1 A I don't know if -- I mean...

2 Q "Boots McCormick is officially a racist.
3 Screenshots prove it beyond a shadow of a doubt."

4 A I don't remember -- I don't remember that
5 specifically, but yeah.

6 Q Did -- did AI write that part about Keith
7 Riddick or did you write that?

8 A Well, I mean, like I said, I'm a bad typer, so
9 I mean, I'm sure most everything was -- I was aided by
10 AI.

11 Q Okay. Who's Trey Nick?

12 A He's a -- a friend of mine. Ran for county
13 commissioner.

14 Q In these e-mails did you try to -- did AI try
15 to convince your reader to get Brad Drake to drop the
16 charges against you for those campaign signs?

17 A Not that I recall.

18 Q Did AI ask or try to get Barbara Morano to
19 drop charges? How would AI know about that?

20 A I would've had to have written an editorial
21 about it or something like that using AI.

22 Q Okay. So -- it says, "Now let's turn to
23 Barbara Morano. Her case is no less alarming. Barbara
24 had a political opponent, Chaz Galloway" -- I think
25 you're referring to yourself in the third person --

1 "arrested over a trivial incident, kicking a \$5 yard
2 sign. The arrest report makes it clear she was the one
3 who called the deputy and pressed charges. Once more
4 we're learning that Suzanne Harris pressured her to
5 escalate the situation. It's becoming clear that
6 Morano's actions were politically motivated, intended to
7 silence a journalist who was a vocal critic of her
8 campaign." Who wrote that?

9 A Me and created by artificial intelligence.

10 Q Okay. And are you asking people to put
11 pressure on Barbara Morano to drop the charges against
12 you in this?

13 A I -- I'm not sure. I mean, I was just putting
14 out a piece of content, but.

15 Q I understand it's content, but usually if
16 somebody puts some work into it, there's a purpose behind
17 it.

18 A I mean, I -- yes and no, I disagree. I mean,
19 you know now with social media everybody posts just about
20 everything that's going through their mind. And at that
21 time I was posting everything that went through my head.
22 So, I mean, it just -- like I said, AI makes things so
23 easy to put stuff out so quickly.

24 Q "Barbara Morano and those like her should not
25 only be rejected by voters but also face serious legal

1 scrutiny for their actions. As a community we must ask
2 ourselves do we really want people like this holding
3 power or even walking free among us?" You're suggesting
4 she ought to be prosecuted, right?

5 A Sounds like it.

6 Q Okay. "Suzanne Harris, the disturbing
7 parallels between her tactics and Munchausen syndrome by
8 proxy." Can you explain that to me?

9 A Not specifically.

10 Q Do you know what Munchausen syndrome by proxy
11 is?

12 A I don't recall, no.

13 Q You don't recall?

14 A No.

15 Q So you are just being very irresponsible with
16 what you're e-mailing people.

17 A I...

18 Q You're not even reading things before you send
19 it. Is that what you're telling me?

20 A Possibly.

21 Q Possibly or yes?

22 A Yes.

23 Q Okay. "Suzanne Harris allegedly pressures
24 Barbara Morano not to drop charges against Chaz
25 Galloway." That was AI too?

1 A I mean, I -- I have to tell AI what to write.

2 Q "In a dramatic turn of events it's been
3 reported that Suzanne Harris has allegedly threatened
4 Barbara Morano, urging her not to drop the charges
5 against political opponent Chaz Galloway." Are you
6 accusing her of witness tampering?

7 A I -- I don't know what I'm accusing her of.

8 Q Well, you seem to be accusing her of
9 something. Can you tell me what you're accusing her of?

10 A Not specifically, no.

11 Q "This development comes just hours after
12 sources close to the Morano campaign indicated that
13 Morano was considering dropping the charges."

14 A Yeah. One of her acquaintances had dinner
15 with me and she was talking about dropping the charges.

16 Q "Barbara Morano throws political opponent in
17 jail." Would that be you?

18 A Yes.

19 Q Okay. What was wrong with those messages
20 being read at the county meeting?

21 A I'm not a law enforcement officer, but
22 personally, they were personal text messages from a
23 personal private phone, and I hadn't worked for the
24 County in over two years. And I wasn't a county employee
25 or anything like that, so.

1 Q I understand --

2 A In my opinion that's what I thought was wrong
3 with it.

4 Q Teresa Lowery was a county employee, though,
5 right?

6 A Yes.

7 Q Okay. And were you discussing county
8 business?

9 A I -- I wasn't a county employee at the time,
10 so I don't -- you know, I wasn't -- anything I -- I
11 wasn't discussing county business. Me and her talked a
12 lot. I don't know -- you have to be more specific.

13 Q Well, do you remember what was read?

14 A Pardon?

15 Q Do you remember what was read?

16 A Do I remember what was read?

17 Q At the meeting.

18 A No, it was very short because Donna Johns got
19 cut off from the county attorney and said you can't --
20 you can't read these.

21 Q Okay. But did it have to be with county
22 business or was she just trying to embarrass you?

23 A I don't know. I don't know what she was
24 trying to do.

25 Q Okay. Why would it be read at a county

1 meeting if it wasn't county business? Especially by a
2 commissioner.

3 A Well, I mean, I'm not the one that decides
4 what is county business. I mean, if you're saying that
5 anything in a meeting read out is county business, I
6 don't -- I don't think that would -- I don't think you
7 can just talk about anything and it be county business
8 just because you're in a -- in a meeting.

9 Q Do you have any idea why those messages were
10 selected to be read?

11 A No.

12 Q Okay. You didn't think that Joe Turner
13 should've been employed by Walton County, right?

14 A I questioned some of his past dealings.

15 Q Okay. Did you have a problem with anything
16 that he was doing at the County?

17 A Not specifically.

18 Q Okay. What about Quinn Robertson?

19 A I don't know Quinn at all.

20 Q You don't know him at all?

21 A Huh-uh.

22 Q Is that a no?

23 A No. No, I do not know Quinn Robertson.

24 Q And have you done any research on him?

25 A No.

1 Q Okay.

2 MS. BOGENSCHUTZ: I'm going to defer to
3 Mr. Webster. I may have a couple of more questions,
4 but I'll defer to you. Sorry, I didn't mean to
5 catch you in the middle of texting.

6 MR. WEBSTER: You're fine.

7 DIRECT EXAMINATION

8 BY MR. WEBSTER:

9 Q I'm Stephen Webster. We met out in the lobby.
10 I represent Quinn Robertson. All right. So you use
11 webElect?

12 A Yes.

13 Q Or you did -- do you still use it actively,
14 or?

15 A No.

16 Q All right. Did you have a subscription to the
17 service?

18 A Yes.

19 Q Okay. Now, basically they just update the
20 voter reg- -- the roll information every so often and
21 then make it available to their subscribers, correct?

22 A Correct.

23 Q All right. Now, you weren't assigned a
24 laptop. Or you testified you weren't assigned a laptop
25 or, I mean, a -- an iPad. But we know now that you were,

1 correct?

2 A I don't know specifically. Jason Cook -- I
3 think y'all are deposing him later. He would know more
4 specifics about that because he's the one that issues
5 things. I really don't know. And that's the honest
6 truth. I don't know how that iPad, but Jason would know,
7 I would think.

8 Q Okay. Well, then explain to me your theory on
9 how your Apple account would've been logged into this
10 iPad if you were never assigned one.

11 A Originally I thought -- I mean, as I reported
12 to the sheriff, I thought it was my personal iPad.

13 Q Correct.

14 A I was wrong -- I was wrong about that.
15 Apparently it was a county iPad.

16 Q Right.

17 A And I don't know -- I mean, I do think Jason
18 Cook had my password. I mean, maybe he -- maybe he
19 logged me in or maybe he was just trying to log me out.
20 I'm really not sure.

21 Q Okay. So your testimony -- you don't disagree
22 that Jason Cook sent you messages and Facebook Messenger
23 on May 23rd, 2023, May 24th, 2023, and May 25th, 2023,
24 asking you to log your -- come in and log your Apple
25 account out of the county iPad?

1 A I don't disagree.

2 Q Okay. So your working theory on how your
3 Apple account got logged in to this -- to this county
4 iPad is because Jason Cook had your password?

5 A Yes, working theory, yes.

6 Q Okay. So if that's the case, then I guess
7 your theory is that he logged your Apple account into the
8 county iPad and then contacted you multiple times asking
9 you to log it out?

10 A Yeah.

11 Q I mean, why -- how does that make sense in any
12 world?

13 A I -- it doesn't.

14 Q You said -- you said that Jason Cook was a
15 friend and that's why you trusted him so much that you
16 gave him your password.

17 A Yes, I understand. And all I know is -- all I
18 really truly know is that my account was logged into and
19 people were monitoring it. I don't know how I got the
20 iPad, or I don't know how they got it. I don't know the
21 specifics of how they logged in. It -- it would've made
22 sense if it had been my iPad that I thought I'd lost. It
23 would've all made sense, but I really don't know.

24 Q Okay. So as you sit here today your testimony
25 is that you never logged your Apple account into that

1 county iPad?

2 A Not that I recall.

3 Q Okay.

4 A I mean, I -- I truly do not remember. And
5 like I said, I'm going off because I -- I have a Mac
6 computer and a phone personally. That's how I -- that's
7 my workflow. I don't use iPads.

8 Q All right. And -- so to then your -- I guess
9 your theory is that Jason Cook, I don't know, like,
10 illegally accessed your Apple information, correct?

11 A I -- I -- I mean, he could've, yes. I mean, I
12 -- I mean, he's the -- put it this way. Jason's the
13 custodian of all the tech devices at that place. I don't
14 think Joe and Quinn could've known about, like, this
15 thing being logged into my account without Jason saying,
16 Hey, by the way, there's an iPad over here, you know,
17 with his -- Jason would've been the only one initially
18 that knew that there was an iPad because that's his job
19 to handle all the tech stuff.

20 Q Okay.

21 A So, I mean, would've started -- it would've
22 started with him.

23 Q All right. But you certainly were on notice
24 as of May 23rd, 2023, that your Apple account was logged
25 into an iPad, and the IT personnel were able to see your

1 text messages and your videos?

2 A I knew that I was logged in. I didn't really
3 know how robust syncing happened, you know. And I never
4 have known anyone to, you know, pry into that stuff.
5 But, yes, I -- I knew as of May -- in May that I was
6 logged into.

7 Q I mean, well, Mr. Cook told you --

8 A Yes.

9 Q -- in the messages that you --

10 A From what I -- yeah, from what I recall.

11 Q You have to let me finish asking my question.

12 A Sorry.

13 Q You're going to make her life difficult.
14 Mr. Cook told you in May of 2023 on three separate
15 messages your Apple account is synced up with our county
16 iPad and all of your personal data, text messages,
17 videos, photographs, are being uploaded and viewable on
18 the County's iPad?

19 A Uh-huh.

20 Q That's a --

21 A Yes.

22 Q Okay. And you did nothing to say, well, heck,
23 I don't like the idea of that. Let me take care of that?

24 A I did not do anything.

25 Q You understand -- but you testified -- well,

1 let me ask you this. Could you have just changed your
2 password on your Apple account?

3 A I could've. And usually -- I think that was
4 what I was thinking. Usually I would just change the
5 password and I guess I never -- I never did.

6 Q Okay. But then why would you give him the
7 password for him to change the password if you could've
8 just changed the password?

9 A No, I gave him the password so he could log in
10 and take care of what he needed -- whatever he needed to
11 take care of. Again, I didn't try to get him to change
12 the password.

13 Q So you -- you gave Mr. Cook your Apple account
14 password so he could log in to your Apple account?

15 A Yeah, because he -- he reached out -- he -- he
16 needed -- he needed it for some specific reason. You
17 know, I -- to log me out or something like that. He was
18 trying to get me to come up and do it in person, but I
19 was -- I was unavailable.

20 Q Okay. But you could've just logged -- we just
21 said -- we just --

22 A I should've just change the password, yes.

23 Q Okay. All right. Then why didn't you just do
24 that to try to protect your data?

25 A I -- I don't remember why I did not do that,

1 but I -- I admit that I could have.

2 Q Okay. And when you first learned that your
3 text messages were being published by Commissioner Johns
4 on December 19th, did you log in to your Apple account
5 that same day?

6 A Yes, from this phone. I wanted to know who
7 was -- I wanted to know how in the world did she have
8 those. And like I said, that's when I found the Jeremy
9 Rowlands -- and I -- I mean, at the time I -- I didn't
10 really know, like, Joseph Turner and Quinn Robertson. I
11 mean, Donna -- Donna -- Commissioner Johns is the one
12 that did it, you know, so I -- I -- I -- I wasn't
13 thinking that it was Joe Turner or Quinn Robertson doing
14 this. I just knew someone in the county administration
15 had my iPad, and I knew Jason knew that there was an iPad
16 with my stuff on it, so. And, I mean, I report- -- you
17 know, I reported it to law enforcement. I -- I'm not a
18 law -- I can't go investigate things. I reported it.

19 Q All right. Did you know Mr. Rowlands when you
20 worked at the County?

21 A He wasn't there yet.

22 Q Okay. And did you change your -- did you log
23 into your Apple account on December 19th, 2023, and
24 change your password to make sure there was no further
25 access to your data?

1 A Not that I recall. I don't remember.

2 Q So if this caused you such extraordinary
3 mental anguish, why didn't you immediately take -- I
4 mean, a very quick step to correct the problem and
5 protect your data?

6 A I mean -- I'm -- I'm not sure. I -- or, I
7 mean, I did -- the immediate step was get the iPad. I
8 wanted law enforcement to recover the iPad. If they
9 could recover the iPad, then I knew no one would be
10 stealing it, so.

11 Q But you could do both.

12 A I could've done both, yes.

13 Q Okay. So you found out in May 2023 from three
14 separate messages from Mr. Cook, who's a good friend of
15 yours that you trust --

16 A Yes.

17 Q -- implicitly, I mean, so much so you gave him
18 your password.

19 A Correct.

20 Q He contacts you three separate times saying
21 your Apple account is synced up with this county iPad.
22 You need to come in here and log it out. We can see all
23 of your data, and you took no steps to do that for six
24 months, correct?

25 A Correct.

1 Q Then you find out on December 19, 2023,
2 conclusively find out that not only is your data being
3 accessed but it's now being published in county
4 commission meetings, causing you extraordinary mental
5 anguish. And yet you still don't log into your account
6 that night and change your password to make sure it's
7 protected?

8 A Correct.

9 Q Okay. Do you think Mr. Rowlands was illegally
10 accessing your data?

11 A I don't even know who he is. And the only
12 reason I even know his name is because the name of the
13 device that was logged in was Jeremy Rowlands' iPad.

14 Q Okay. Do you believe that my client illegally
15 accessed your data?

16 A I have no idea. I -- I don't know. That was
17 law enforcement, you know, who told me, you know, did a
18 really lengthy investigation.

19 Q Did you ever review all the investigative
20 materials? Because, I mean, there's a lot.

21 A I have not, no.

22 Q Okay. Nobody ever provided you a copy of all
23 the investigative summaries and all that?

24 A No.

25 Q Okay. Now, I mean, but you -- you don't

1 disagree with me. It is your responsibility to protect
2 your data?

3 A Sure.

4 Q Is that a yes?

5 A I do not disagree.

6 Q Okay. Do you recall -- I mean, and this --
7 look, if you didn't read it, I don't -- I don't know that
8 I would've. But did -- do you recall ever reviewing the
9 personnel handbook, like the employee handbook and all
10 the personnel policies they gave you?

11 A Not specifically.

12 Q Okay. Were you aware that in the -- in the
13 handbook it says that all e-mail accounts will be
14 monitored by IT?

15 A I don't recall specifically. I was there for
16 a very short stint four years ago. And then this --
17 these incidents happened two years later, so -- I mean, I
18 wasn't a county employee -- I wasn't even a county
19 employee when Quinn and Joe worked there, you know. So,
20 I mean, my -- my stint as a county employee was very
21 short, and it was a very long time ago, so.

22 Q Okay. Now, you say your memory is foggy about
23 your conversation with Special Agent Riddick, and I
24 understand.

25 A Yeah.

1 Q But when you documented that in your blog,
2 what he said to you, that would've been closer in time to
3 it occurring, that conversation occurring?

4 A Right.

5 Q Than today, correct?

6 A Right.

7 Q All right. So you probably -- back then you
8 would've had a better recollection of what Special Agent
9 Riddick said?

10 A Yes.

11 Q Okay. I'm sorry. I have to do this for the
12 record.

13 A Yeah, okay.

14 Q Isn't it true that Jason Cook contacted you on
15 May 24th, 2023, via Facebook Messenger and requested that
16 you come into the office to log your Apple account out of
17 the county iPad?

18 A Yes.

19 Q Isn't it true that you did not respond to his
20 request that he sent to you on May 24th, 2023, and come
21 in and log your Apple account out?

22 A Yes.

23 Q Isn't it true that Jason Cook contacted you on
24 May 25th, 2023, via Facebook Messenger and requested that
25 you come into the office to log your Apple account out of

1 the county iPad?

2 A Yes.

3 Q Isn't it true that you did not respond to that
4 request sent to you on May 25th, 2023?

5 A Yes.

6 Q Isn't it true that Jason Cook contacted you on
7 May 26th, 2023, via Facebook Messenger and requested that
8 you come into the office to log your Apple account out of
9 the county iPad?

10 A Yes.

11 Q Isn't it true that you did not respond to that
12 request that was sent to you by Mr. Cook on May 26th,
13 2023?

14 A Yes.

15 Q You said that -- you kind of did your hands
16 when you were testifying, and I believe you testified
17 that you texted Mr. Cook your -- your password, correct?

18 A From my recollection, yes.

19 Q So can you produce a copy of that text
20 message?

21 A No.

22 Q Why not?

23 A It was just a long time ago, and I -- I just
24 don't have it.

25 Q So you deleted --

1 A Just going off memory.

2 Q So you deleted your conversation with Mr. Cook
3 out of your phone?

4 A Yes. Yes, I no longer have it.

5 Q So at some point you would've deleted that?

6 A I mean, I -- I don't delete things. I think
7 things like just kind of -- I don't -- I don't
8 specifically remember deleting it, but I could not find
9 it, if that answers your question. I could not find it.
10 I could not access it. But I'm not -- I don't make a
11 habit of deleting messages or e-mails or anything like
12 that.

13 Q I believe at the beginning of your deposition
14 you testified this is probably the same Apple iPhone that
15 you had when you were working at the County, correct?

16 A Yes.

17 Q So unless you deleted --

18 A Personal -- yeah, personal. They issued me a
19 county phone, and they took that back. And I never even
20 used that.

21 Q So unless you affirmatively deleted that
22 conversation with Mr. Cook, it should be available on
23 your phone that you have with you today, correct?

24 A Correct.

25 Q Okay. Just give me a moment so I can -- now,

1 there were was -- there were some reports that at some
2 point you received data from Nathan Kervin of four
3 hundred and twenty-seven county employees.

4 A When I worked there -- I think we were trying
5 to do something with employees' birthdays or something,
6 like to announce, like, whose birthday it was on social
7 media or something like that.

8 Q I think there's an e-mail with the subject as
9 birthdays that you -- you initiated that, that you wanted
10 to be able to wish people happy birthdays?

11 A Yeah.

12 Q Okay. And so you were provided the data from
13 four hundred and twenty-seven county employees, including
14 their name, hire date, personal phone numbers, personal
15 e-mail addresses, and other descriptive information,
16 correct?

17 A I don't recall what was on the spreadsheet,
18 but he -- he sent me the employee information -- you
19 know, information that I requested.

20 Q Do you know if that included addresses?

21 A Physical addresses? I don't recall if it did
22 or not.

23 Q Okay. Do you know if any of those were law
24 enforcement, sworn law enforcement employees?

25 A They were not, no. It was just county

1 administration.

2 Q And is it your understanding that how webElect
3 works that any information that is put into the public
4 record is basically public record and can be traded,
5 published, and utilized by third parties?

6 A To my understanding, yes.

7 Q Okay.

8 A I mean, the Republican Party funds it, so
9 yeah, I -- I took their word for it.

10 Q Right. And so basically by inserting items
11 and data into the public record, you waive your privacy
12 interest over that data, correct?

13 A I believe so, yes.

14 MS. BOGENSCHUTZ: If you need a minute, I
15 can --

16 MR. WEBSTER: Go ahead.

17 MS. BOGENSCHUTZ: Okay.

18 REDIRECT EXAMINATION

19 BY MS. BOGENSCHUTZ:

20 Q Is it fair to say that when you gave -- I
21 mean, you're claiming you gave Jason Cook the password to
22 your iCloud account. Is it fair to say that you then
23 consented to him accessing anything in your iCloud
24 account?

25 A It's fair to say, yes.

1 Q Okay. And therefore consenting to anything he
2 would've done with it?

3 A Yes.

4 Q Okay. Was there a situation where you
5 e-mailed yourself an Excel document from your Walton
6 County e-mail address when you were working there to your
7 personal e-mail address that contained thirty thousand
8 e-mails in it?

9 A Possibly.

10 Q Okay. When you say possibly, is it -- I mean,
11 how often would you do something like that? Is it you
12 just don't remember or --

13 A I don't remember.

14 Q -- you do it so often that --

15 A I don't remember.

16 Q Okay. Have you made up any additional e-mail
17 addresses to contact county employees?

18 A Have I made -- sorry, say the question again.

19 Q I did a public records request asking for any
20 e-mails you had exchanged with county employees. What
21 e-mail addresses have you created to do that?

22 A I mean, I have lots of e-mail addresses. I
23 don't -- I don't know -- you mean like private
24 communication between a county employee? Like sending
25 e-mails?

1 Q You contacted --

2 A Like, individual e-mails?

3 Q Yes.

4 A Not that I recall. I don't -- I don't send a
5 lot of individual e-mails. I send a lot of mass e-mails.

6 Q Okay. Have you done a public records
7 requests?

8 A No, not many.

9 Q Okay. When I did my public records request,
10 they had multiple e-mails that they thought belonged to
11 you, different e-mail addresses that were kind of
12 colorful language. Do you recall creating those?

13 A No, not specifically.

14 Q Okay. Are you saying that you never created
15 any e-mails that contained some colorful language?

16 A Colorful? Define colorful language.

17 Q It referred to pieces of anatomy.

18 A Oh, that's -- no, I definitely did not do
19 that.

20 Q Did not do that?

21 A Yeah.

22 Q Okay.

23 A Yeah, that's not something I did.

24 Q Okay. And so anything -- did you create any
25 other e-mail addresses that you only used for specific

1 purposes of contacting the county commission?

2 A No.

3 Q Okay. What about for contacting public
4 records?

5 A No. I don't -- I don't make it -- I don't do
6 a lot of public records requests, so I -- I mean, the
7 answer is no.

8 Q What about -- what e-mail addresses have you
9 sent these mass e-mail things from?
10 Laugh@chazgalloway.com?

11 A Yeah, laugh@chazgalloway, yeah.

12 Q Okay. Other than that?

13 A I don't recall. I mean, there could've been
14 some, but I don't recall which one specifically.

15 Q When's the last time you sent one?

16 A The summer of '24.

17 Q When's the last time prior to that?

18 A The last time prior to that?

19 Q Yes.

20 A I mean, I -- I was sending mass e-mails, you
21 know, like the six months leading up to that, you know,
22 using laugh@chazgalloway, whatever. But that was --
23 like, the way Constant Contact works you log in with an
24 e-mail address, and that was -- that was my login to
25 Constant Contact.

1 Q How many other people did you give your iCloud
2 account password to other than Jason Cook?

3 A No one.

4 Q So you were that close of friends with Jason
5 Cook that he is the only person you gave that e-mail
6 address to --

7 A It's the only one --

8 Q Or that -- excuse me -- password to?

9 A He's the only one that's ever asked for it
10 from me. I -- I mean, I -- no one has ever needed it
11 other than him. I can honestly say that.

12 Q Okay.

13 MS. BOGENSCHUTZ: Sorry. You want to...

14 REDIRECT EXAMINATION

15 BY MR. WEBSTER:

16 Q Now, sir, you understood that when you
17 executed your Affidavit of Complaint to -- for the
18 criminal case to be initiated, that that was under the
19 oath of perjury?

20 A I -- not specifically, but I'm sure -- yeah --
21 yes.

22 Q You understood that it was sworn, a sworn
23 statement, correct?

24 A Uh-huh. Yes.

25 Q Okay. And that you had a duty to tell the

1 truth, the complete truth in there, correct?

2 A Right.

3 Q Now, you included in here that it was a
4 personal iPad that was stolen, which we know is not true
5 now.

6 A Which I thought at the time.

7 Q Okay. But we know that wasn't -- we know now
8 that's not true.

9 A From what law enforcement has told me.

10 Q So you think it's still -- maybe -- okay.

11 A I apologize. Yes, we now know that's not
12 true.

13 Q Okay. And you also said that you weren't
14 issued an iPad, but you can't affirmatively testify that
15 that's the case as you sit here today, correct?

16 A Correct.

17 Q Okay. And then at the end -- near the end of
18 your statement you said, "The data in question includes
19 private photos and videos now being circulated that
20 could've only have originated from my iPad." Right?

21 A Correct.

22 Q But we know that's not true.

23 A Well, I meant like -- yeah, I -- I worded that
24 wrong. It could only have originated from an iPad that
25 was logged into my account. Because the photos that were

1 circulating were things from my phone. Somehow --
2 somehow they got there, so it only could've originated
3 from an iPad logged into my account.

4 Q Okay. So when you affirmed under oath of
5 perjury that the data could've only have originated from
6 your personal iPad, that wasn't true, right?

7 A As we know now. Like, I didn't knowingly
8 commit perjury. I thought -- I thought at the time that
9 that was, you know.

10 Q Okay. But -- but you knew for at least six
11 months prior to signing this affidavit that your data was
12 being synced up to the county iPad because your good
13 friend, Jason Cook, who you trust implicitly told you
14 three different times that was happening?

15 A Yes.

16 Q Okay. You just forgot about that when you
17 signed this affidavit?

18 A I don't -- I don't know if I forgot. I just
19 wasn't thinking that and I wanted to get the -- I wanted
20 to find the iPad. And that's how I was going to stop the
21 data leak rather than logging out of it.

22 Q You were trying to have people prosecuted,
23 have their liberties stripped away from them when you
24 came in and signed this criminal complaint, correct?

25 A If that's how you see it. I was reporting my

1 data being taken --

2 Q So you --

3 A -- because I didn't even know who had done it.
4 So, I mean, I'm not -- I didn't have specific motives.
5 I just didn't want my text messages read out in the
6 meetings anymore.

7 Q So you weren't asking law enforcement to
8 investigate and arrest the people who had accessed your
9 data, your private data from your iPad that you allege
10 was stolen?

11 A I mean, I -- I reported it stolen. I don't
12 tell law enforcement how to do their job. I mean, I just
13 said, Hey, here's -- here's a crime that I think is going
14 on. I mean, I -- I didn't -- I don't remember telling
15 them what to do.

16 Q You understand that's kind of like how the
17 sequence works, right? You file a criminal complaint --

18 A Yes, I understand.

19 Q People face potential arrest and prosecution?

20 A Correct.

21 Q Okay. Do you recall sending text messages
22 with Ms. Lowery? I think they were published at that
23 county commission meeting. It said, "Can someone" -- or
24 she asked you, "Can someone please explain to me how one
25 can steal public records?" And you responded, "Not sure.

1 And even if they did, can't imagine that there would be
2 much punishment for it." Do you remember having that
3 exchange?

4 A Not specifically.

5 Q Okay. Do you know what that was in reference
6 to?

7 A There was this big -- there was a big Facebook
8 group that everybody -- the local political people talk
9 in. And there -- it's always been this big conspiracy
10 that I -- instead of using webElect I stole e-mails from
11 the County when I worked there. And it's like -- so
12 they're always -- what she was probably referring to was,
13 well, everything at the County's public records, so, you
14 know, what they're saying is how can you steal something,
15 you know. But, I mean, it's just that she was responding
16 to things that were being said on social media.

17 Q So kind of like if it's in the public record,
18 it's everybody's business basically?

19 A That's what she was probably alluding to.
20 Yeah.

21 Q And you were like, yeah, that makes sense to
22 me, right? That's kind of basically how you responded.

23 A Right.

24 Q Now, were you aware that when this -- when
25 your complaint was filed originally on December 26th,

1 2023, that Jason Cook was considered a person of
2 interest?

3 A I'm sorry, can you repeat the question?

4 Q Were you aware that the day you filed your
5 complaint, December 26th, 2023, Jason Cook was identified
6 as basically a suspect?

7 A I was not aware of that.

8 Q Do you think Jason Cook deserved to be
9 considered a criminal suspect for what occurred here?
10 Your good friend.

11 A Yeah. Yeah, I do. He was the only one
12 that -- I mean, he -- he -- he knew that iPad was there
13 and that it was producing my private data, so.

14 Q How do you know he knew that?

15 A Because when he reached out in May '23, he was
16 saying you need to come log out of this. It's syncing
17 all your data. He told me that he...

18 Q Because you failed to do that for six months,
19 you think he deserved to be named a criminal suspect in
20 public records?

21 A I mean -- I guess when I was wondering, like,
22 who -- you know, how did it get to Donna Johns and all
23 that stuff, you know, I mean, I figured Jason had
24 something to do with it, you know.

25 Q Okay. So now, here, you sent this message.

1 Do you recall sending this to the investigator?

2 A Possibly.

3 Q And you typed a note in there?

4 A Oh, yeah, okay, yeah.

5 Q It's basically Jason Cook's, I guess, face
6 sheet on the Walton County --

7 A Yeah. I was just making notes, yeah.

8 Q And you put a note in there, "Jason Cook
9 reached out to me via text message approximately six
10 months ago informing me that he was in possession of an
11 iPad that was logged in with my Apple ID." Correct?

12 A Correct.

13 Q But your testimony today is he contacted you,
14 and that was the first time -- he didn't have your
15 password before he contacted you, correct?

16 A Correct.

17 Q Okay. So, then I guess it doesn't make sense
18 with your testimony that you believe Jason must've logged
19 in after you gave him his password if you acknowledge
20 that when he first reached out to you he didn't have your
21 password, and you were already logged in.

22 MR. MITCHELL: Is there a question?

23 BY MR. WEBSTER:

24 Q Yeah, like, can you explain that to me? Like,
25 how do you -- what is your thought on how -- I mean, how

1 can I reconcile those two different things?

2 A I really don't know. It was a mystery about
3 how that iPad got logged in or maybe it just got lost in
4 time. Maybe I logged into it when I was a county
5 employee. I -- I just don't -- I don't remember. I
6 don't know.

7 Q And then you sent the investigator this
8 message on -- once again, on Walton County -- from the
9 Walton County website regarding Jeremy Rowlands, correct?

10 A Uh-huh.

11 Q And you put in the note, "This staff member is
12 currently logged into my account." Correct?

13 A Correct.

14 Q But you could've literally -- as soon as you
15 sent this you could've logged into your Apple account,
16 changed your password, and then ended -- ended any
17 further access?

18 A Yes. Hypothetically, yes. Yes.

19 Q What is Trumpr? T-R-U-M-P-R.

20 A Trumpr, that was a mobile app that I built --
21 let me see, what year was it? It was 2020.

22 Q Did you -- did you use county resources to
23 build that app?

24 A No.

25 Q Okay.

1 A That was before I was a county employee.

2 Q Okay. At any point did you work on it using
3 county resources?

4 A Not using county resources, no.

5 Q Okay.

6 A I mean, no.

7 Q What -- what was kind of the purpose of the
8 app? What did it do?

9 A Donald Trump had just been kicked off of
10 social media, so I made an app that was only -- only for
11 Trump supporters to talk about Donald Trump. It was
12 nothing very serious. It was just kind of a little
13 passion project, hobby. Didn't, you know -- I mean,
14 building apps is one of my hobbies.

15 Q I think I'm almost done. Have you ever spoken
16 to anybody at the state attorney's office about this
17 whole matter?

18 A No, not that I know of.

19 MR. WEBSTER: I don't think I have anything
20 further. Thank you for your time, sir, as far as
21 I'm concerned.

22 MS. BOGENSCHUTZ: I have a couple more
23 questions about the Trumpr app. Do you want to go?

24 MR. MITCHELL: I just want to clarify
25 something.

1 CROSS-EXAMINATION

2 BY MR. MITCHELL:

3 Q I spoke to you as you walked in this morning
4 before -- before this deposition, correct?

5 A Correct.

6 Q I introduced who I was?

7 A Yes.

8 Q Okay. So while I think in the spirit of the
9 question you answered it truthfully, you have talked to
10 me prior to this deposition --

11 A Yes.

12 Q -- this morning?

13 MR. WEBSTER: That wasn't -- yeah, that didn't
14 count for what I was asking.

15 MR. MITCHELL: Yeah. Okay.

16 FURTHER REDIRECT EXAMINATION

17 BY MS. BOGENSCHUTZ:

18 Q Did you have any involvement in posting a
19 video from Eagle Springs Golf Course?

20 A No.

21 Q Any idea who did?

22 A I -- I mean, Robert --

23 Q The post.

24 A -- Nelson sent me a link to that.

25 Q What was the link to?

1 A A video of private security footage of Quinn
2 and some employees drinking.

3 Q The county commission -- county commission
4 employees, county employees?

5 A Correct.

6 Q And do you know where Robert Nelson got it?

7 A No.

8 Q Was this video a -- and I don't know if I can
9 explain this. Like, was it downloaded and sent to you as
10 a video or was it maybe somebody taking a video of a
11 video playing?

12 A All I was sent was a link to a YouTube video.

13 Q Right. Was that video that you saw -- did
14 it -- was it --

15 A I know what you're saying.

16 Q Yeah.

17 A I don't recall --

18 Q Was it a video of a video?

19 A Right. I don't recall. I -- I really don't
20 remember.

21 Q Was it taken with your phone?

22 A No.

23 Q Was it taken with your iPad?

24 A No.

25 Q Was it taken with a computer that belonged to

1 you?

2 A No.

3 Q And how many different phones, iPads, and
4 computers have you had since that Eagle Springs video was
5 posted?

6 A I've had one phone.

7 Q Okay. And do you -- because Robert Nelson is
8 deceased do you -- did you ever have any conversations
9 with him about where he got that video?

10 A Huh-uh.

11 Q Is that a no?

12 A That's a no. No.

13 Q When did he send you the link?

14 A When?

15 Q Yes.

16 A I mean, around December of 2023.

17 Q Any -- and do you have any idea if he had any
18 contact with any county commissioners?

19 A I have no -- I have no idea.

20 Q So December of '23 is what you're saying?

21 A I believe so, yeah.

22 Q So --

23 A Or it could've been January of '24. I -- I
24 don't remember.

25 Q Before or after this stuff came out at the

1 meeting?

2 A After. It would've been after.

3 Q Okay. Why would he have sent that to you?

4 A I mean, it was political gossip. There's a
5 lot of -- I mean, political gossip is all over, you
6 know -- I mean, it's -- it's why people go to meetings.
7 There's a big -- I mean, it was just, Hey, look at this.
8 There's a -- there's a county administrator having drinks
9 during working hours. It was a very juicy, gossipy story
10 that got around. And I wasn't the only one that was
11 talking -- you know, had it. I mean, you -- you
12 understand what I mean by that. Like, it's a very small
13 town and, you know, the things that are the talk of the
14 town, that was the talk of the town that week.

15 Q Did you ever outsource any of your jobs at --
16 while you were employed by Walton County to Flocksy or
17 Monday?

18 A Flocksy -- or Monday.com is a piece of
19 software for, like, task management. So that's not
20 outsourcing your job. Flocksy was a subscription service
21 that you can do graphic design and things like that. And
22 that was approved by my superiors to -- you know, to use
23 that.

24 Q And the County paid for that account, right?

25 A Yes.

1 Q Did you ever use it with Trumpr, your personal
2 app?

3 A No, not that I recall.

4 Q That would certainly be a violation if you did
5 that, right?

6 A A violation of being an employee there, yes.

7 Q Okay.

8 A To use -- yeah.

9 Q County --

10 A Yeah.

11 Q -- stuff for your personal use?

12 A Correct.

13 Q At any point in time when you were working
14 there, did you ever use county property for your personal
15 use?

16 A Not intentionally, you know, but, I mean --
17 you know, I had a county vehicle, you know, I might've
18 run a personal errand or something with my county vehicle
19 or something like that.

20 Q Okay. And I just -- really we're beating a
21 dead horse here, but you're trying to say that Jason Cook
22 may have logged into this iPad using your iCloud account
23 and monitored it for six months?

24 A I don't know if he was monitoring it, but I
25 know he logged in it -- into it and had possession of it

1 until December of '23 when the law enforcement seized it.
2 So I don't -- I don't know if he was monitoring it or
3 not.

4 Q Okay. When you allegedly gave him your
5 password, did you ever say don't share this password with
6 anybody?

7 A No, I didn't say that.

8 Q Okay. Do you think that based on everything
9 we've gone through here that you had a reasonable
10 expectation of privacy in your messages? Based on...

11 A Yeah, I -- I would think that I would have a
12 reasonable expectation of privacy just out of human
13 decency. But, I mean, I have to give someone my
14 password. I -- I thought so. I'm -- I'm -- this -- this
15 whole case is -- I'm realizing that I'm probably wrong on
16 that, that I guess I should not have expected to have
17 privacy.

18 MS. BOGENSCHUTZ: I digress.

19 MR. WEBSTER: I just want to put on the record
20 that the exhibits that I showed to Mr. Galloway, the
21 Walton County website printout for Jeremy Rowlands
22 was -- I have Bates numbers on mine, and it was
23 Bates Number 599. And then the screenshot or
24 whatever of the Walton County website information
25 for Jason Cook bears my Bates Number 600.

1 MS. BOGENSCHUTZ: Here, if you want, I'll give
2 you mine if you want to make these exhibits.

3 MR. WEBSTER: Okay. That's perfect.

4 MR. MITCHELL: So that will be Defendant's 1
5 and 2?

6 MS. BOGENSCHUTZ: Yeah. Mine don't have Bates
7 stamps, so.

8 (Exhibit Nos. 1 & 2 were marked for identification.)

9 MR. MITCHELL: Okay. All right. Appreciate
10 you coming in, man. Thank you.

11 THE WITNESS: Thank you.

12 (Conclusion of the deposition.)
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CERTIFICATE OF OATH

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STATE OF FLORIDA)

COUNTY OF WALTON)

In my capacity as a Notary Public of the State of Florida, I certify that on the 27th day of October, 2025, CHARLES "CHAZ" GALLOWAY, personally appeared before me and took an oath or affirmation.

WITNESS my hand and official seal this day, the 9th of November, 2025.

Racheal Callahan

Racheal L. Callahan, FPR
Notary Public - State of Florida
Commission # HH 487945
Expires February 1, 2028

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF WALTON)

I, Racheal Callahan, Stenographic Court Reporter,
certify that I was authorized to and did
stenographically report the foregoing deposition of
CHARLES "CHAZ" GALLOWAY; that the witness did waive
reading and signing; and that the foregoing pages are a
true and complete record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative,
employee, attorney, or counsel of any of the parties,
nor am I a relative or employee of any of the parties'
attorney or counsel connected with the action, nor am I
financially interested in this action.

Dated this, the 9th day of November, 2025.

Racheal Callahan

RACHEAL CALLAHAN, FPR
Stenographic Court Reporter
Notary Public-State of Florida

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