

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

Deposition of Jason Cook
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: JASON COOK

ON BEHALF OF: Defendant

DATE: October 27, 2025

TIME: 1:51 p.m. - 2:50 p.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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UNOFFICIAL DOCUMENT

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: Yes, ma'am.

5 JASON COOK,
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 Have you ever done a deposition before?

11 A No, ma'am.

12 Q Okay. So this lady's taking down everything
13 that we're saying, but there's no video on you. So if
14 you say uh-huh and nod, we're all going to know you meant
15 yes, but somebody's going to jump up and say was that a
16 yes, because she can only write down what you said. And
17 U-H-U-H could be uh-huh or huh-uh in five months. So
18 just know somebody's going to jump in and be like that.
19 If you nod, we're going to need you to say it.

20 A Yes, ma'am.

21 Q And let's see. If anything is not clear to
22 you, feel free to just tell us to rephrase the question.
23 And if you're not sure about something, it's okay to
24 qualify things, like say, look, I know it must have been
25 in December because the Christmas lights were up and it

1 was cold out. Other than that I can't tell you what the
2 date was. So you're allowed to, like, qualify things if
3 you're not sure about something, but you can kind of give
4 us an idea.

5 A Yes, ma'am.

6 Q So let's see. Where do you work?

7 A I work for Walton County Board of County
8 Commissioners, County Administration.

9 Q And you are in IT, right?

10 A Not necessarily. I'm in technology.

11 Q Okay.

12 A Yeah.

13 Q So you're in technology. What's your position
14 or title?

15 A Technology and media manager.

16 Q Okay. How long have you been holding that
17 position?

18 A This exact position three to four years.

19 Q Okay. So at the time that this occurred, the
20 facts that gave rise to this case, you were holding the
21 same position?

22 A Yes, ma'am.

23 Q Okay. To my understanding this involved an
24 iPad, right?

25 A Yes, ma'am.

1 Q Can you tell us how you became aware there was
2 something going on with this iPad?

3 A So whenever we hired Jeremy Rowlands, he -- he
4 had a -- an iPad on the shelf, you know, for somebody to
5 use. He wanted to use an iPad, so I was like just grab
6 one off the shelf. He got it and tried to use it. And
7 that's when he noticed that Charles Galloway, Chaz, had
8 been -- he was signed in to the iPad. And this is the
9 iPad you're referring to, correct?

10 Q Yeah, yeah. So signed into the iPad via his
11 iCloud account?

12 A That's right.

13 Q Okay.

14 A And so I was, like, well, we won't use it.
15 And that's -- I'll just stop there.

16 Q Yeah. So based on finding that out, finding
17 out that Chaz Galloway was signed in to his personal
18 iCloud account, what did you do?

19 A I -- I actually sent him a message on Facebook
20 Messenger asking him to -- to sign out of it.

21 Q Okay. And when you were asking him to come
22 sign out of the iPad, did you mean come down to your
23 office or the area where you work?

24 A I didn't actually mean that because I -- I was
25 under the impression that you could just sign out from

1 where you're at. But I believe that in his response he
2 said I'll come down there and sign out.

3 Q Okay. Yeah, that's -- that's -- you brought
4 up something, and I'm going to use mine as a -- I have an
5 iPhone here. So, like, if I go in here and I'm, like --
6 if I want to -- like, my husband's MacBook, I can remove
7 it, erase it, right?

8 A Exactly. And that's what I thought he was
9 going to do.

10 Q Okay. And then -- so he said he would come
11 down and sign out of it?

12 A I believe that's what he said when he
13 responded to me.

14 Q Okay. Did you have to make a couple of
15 different attempts to get him to respond to you?

16 A I can't remember. I just remember the one
17 time.

18 Q Okay.

19 A I don't remember if I did it again.

20 Q Did he ever come down and sign out?

21 A No, ma'am.

22 Q And so what was going on with the iPad if he
23 didn't come down and sign out?

24 A So whenever I asked him to come down -- we put
25 it back on the shelf. He never came. And it was, like

1 -- about one to two weeks later we went to check to see
2 if he signed out. And that's when we noticed that he
3 hadn't signed back out.

4 Q Oh, you were expecting that maybe he would've
5 done it remotely?

6 A Exactly. Like, well, he didn't call me, maybe
7 he did it remotely.

8 Q Okay. Okay. That's good. And did he -- you
9 didn't log in to the iPad for him, did you?

10 A No, ma'am.

11 Q Okay. You didn't, like, access his account
12 and plug in his password or anything like that?

13 A To his iCloud account?

14 Q Yeah.

15 A No, ma'am.

16 Q Okay. So once you realized that he hasn't
17 done this, what do you do from there? Because it's
18 pretty much commandeering an iPad, right? Like, I mean,
19 you can't use it for somebody else.

20 A Right, until he signs out.

21 Q And am I correct in assuming that the reason
22 you didn't just wipe the iPad was because of public
23 records issues, right?

24 A Well, you can't wipe an iPad unless somebody
25 -- unless they sign out of their iCloud account.

1 Q Oh, really?

2 A Uh-huh.

3 Q Okay. So I guess you could've. I mean, was
4 it an option to just wipe the iPad for you or no?

5 A Well, I mean, I didn't try to wipe it.

6 Q Okay.

7 A No, ma'am. But in my experience with iPads,
8 you can't wipe an iPad unless you sign out of it, unless
9 you have a mobile device manager.

10 Q Okay.

11 A And we didn't have one at the time.

12 Q I gotcha. Okay. What's a mobile device
13 manager?

14 A Where you can manage your devices remotely.

15 Q Okay.

16 A Like, you have control over them.

17 Q Gotcha. So like a -- a hub?

18 A You can -- you can erase it then.

19 Q Okay.

20 A Because you're -- they're accessing your
21 mobile device manager.

22 Q So did you allow Jason Rowlands to continue
23 using the iPad with Chaz logged into it?

24 A Jeremy Rowlands, he never -- after we noticed
25 that he -- Jeremy never used it. He put it back on the

1 shelf.

2 Q Uh-huh.

3 A I was, like, well, let's see if he signed out
4 of it. And I went, you know, looking, and that's when I
5 noticed he ain't signed back out of it. Jeremy never
6 used it.

7 Q Oh, okay.

8 A To -- to my knowledge he never used it
9 anymore.

10 Q The reason I'm asking is because I -- I think
11 it was renamed Jeremy Rowlands' iPad, and that's -- but
12 that doesn't necessarily mean he was using it.

13 A Right. I think he might've tried to go to set
14 it up and then he realized that, hey, Chaz was still
15 signed in and that's when he brought it to me.

16 Q Okay. When did you become aware that there
17 was, like, maybe county business being discussed via
18 Chaz's text messages?

19 A When we got the iPad back down to -- and I
20 checked it, I saw the text messages, and then that's when
21 I saw in one of those threads that it had County
22 Administrator Robertson.

23 Q Uh-huh.

24 A Quinn Robertson -- Quinn's name.

25 Q Oh.

1 A And that's how I -- I was like, well, it's got
2 his name, so that's when I took it to Quinn.

3 Q Okay. So there was maybe a text chain between
4 Chaz and Quinn or that his name was in a text message?

5 A His name was in the -- right.

6 Q Okay.

7 A Because I was going back to see if he's still
8 signed in.

9 Q Right.

10 A And that's when I saw that and I -- I took it
11 over -- well, your name's in this text message.

12 Q Okay. So you were basically like I don't know
13 what's going on with this, but he's talking about you?

14 A Exactly.

15 Q Okay. Did you see anything in there that
16 seemed to be like a misuse of county anything or other?

17 A In?

18 Q Or was it just -- was it just his name or did
19 you do any further digging about --

20 A I just saw his name on it. I'm, like, here's
21 the iPad.

22 Q Gotcha. What is your understanding as to how
23 Chaz Galloway became hired for the period of time he was?

24 A My understanding?

25 Q Yeah.

1 A Can you clarify? What do you mean?

2 Q I mean, was this -- did somebody basically put
3 in a -- ask a favor to have him hired, or?

4 A I'm not sure.

5 Q You're not aware?

6 A No, ma'am. I was on the -- I was part of the
7 hiring...

8 Q Committee?

9 A Right.

10 Q Okay.

11 A But I wasn't under any assumption that
12 somebody -- what word did you choose?

13 Q I don't know, like a -- like a -- kind of a
14 crony hire.

15 A I wasn't aware of any of that.

16 Q Maybe that would be a -- a better way of
17 putting it. Do you have any idea when he left?

18 A When he -- when he quit?

19 Q When he stopped working, yeah.

20 A No, ma'am, I don't recall a date or time
21 frame.

22 Q Do you recall if there was ever any
23 investigation into whether he was using county resources
24 for his personal use?

25 A Yes.

1 Q Can you tell me about that?

2 A So when he left, he had a county P-card.

3 Q A who?

4 A A county purchasing card.

5 Q Oh, okay. Thank you.

6 A So -- and for some reason whenever he left --
7 they have to be reconciled.

8 Q Okay.

9 A And he -- I was the one that somehow had to go
10 through it and reconcile it for him. And so whenever I
11 was going through the reconciliation, there was a charge
12 for a -- a service I'd never heard of. And it was called
13 Flocksy. And -- and when I did some research trying to
14 get into it, because you know it was a county P-card, so
15 I actually called the company and, you know, said, Hey,
16 this was purchased with a county P-card. He's no longer
17 here. I need to get in and get an invoice where we can
18 reconcile this county P-card with this service. And
19 whenever they changed it to my name where I could log in,
20 I saw what kind of stuff that he had been doing in it.

21 Q And was that county work?

22 A I'd say like 90 percent of it was county work
23 or maybe more.

24 Q And then -- but 10 percent was what?

25 A There was -- there was a document or a -- a

1 job for them to do that involved like a PowerPoint, and
2 it wasn't for county work. It was for a business.

3 Q Like a -- a business that Chaz owned, or?

4 A I don't know if he owned it or not. I don't
5 even remember the name of the business now. But that was
6 whenever he quit. But it just wasn't county-related.

7 Q Okay.

8 A It was a PowerPoint for some consulting
9 company.

10 Q Okay. And so -- and this account was
11 obviously paid for by the County, right? Because it was
12 on the purchasing card?

13 A Yes, ma'am.

14 Q Was there something that happened on
15 Monday.com too? Do you remember something with
16 Monday.com?

17 A Monday.com was -- from what I can remember,
18 was a service that he wanted the County to use. And I
19 believe that we had like a trial version. And -- but
20 whenever I -- well, that was on the P-card statement as
21 well that I had to reconcile. And so I had to go in
22 there and get my name, I believe, added to that account
23 too.

24 Q Right.

25 A And I believe -- if I recall correctly, he --

1 inside of our county account it was, like, mixed with
2 personal account and he had, like, some personal debit
3 cards attached to it. And so I just logged out -- out of
4 that once I saw that. I believe that was the Monday
5 account.

6 Q Do you know if there was ever any kind of an
7 investigation into that?

8 A Supposedly there was.

9 Q Do you know who did it?

10 A I think it was given to the sheriff's office.

11 Q Do you know if there was ever a full celebrate
12 done of a MacBook Pro that was assigned to Mr. Galloway?

13 A What did you say again?

14 Q A celebrate?

15 A Oh, where they --

16 Q Like a down- -- yeah, a download dump,
17 basically dump --

18 A A MacBook Pro?

19 Q Uh-huh.

20 A That was a county laptop?

21 Q Yes.

22 A If there was, I don't remember that. I know
23 that I took some files that I had from all this stuff in
24 his accounts to the sheriff's office. But I don't
25 remember a MacBook Pro.

1 Q Do you know who -- or how that criminal
2 investigation -- I'm assuming it's a criminal
3 investigation -- how that was initiated? Was that you,
4 or did you bring it to somebody else who brought it to
5 them?

6 A I brought it up to the -- the county -- I
7 brought it to the County, and I can't remember who it
8 was. We've had so many county administrators go in and
9 out lately. I brought it to their attention. And then
10 the chairman got involved, and I believe our legal,
11 county attorneys, got involved. And after I explained
12 everything, they took it, and I believe I took it to the
13 sheriff's office. That's when I got a call later and I
14 had to take all these files over there.

15 Q Gotcha. Do you have records as to -- and I'm
16 just going to go back to this individual iPad. Do you
17 have -- like, for example, I used to work for a state
18 attorney's office that was larger, but you would have to,
19 like, sign for a computer when you took it out.
20 Especially a laptop, like, not one that's sitting on your
21 desk, but something that you could remove from the
22 building. Do you have any paperwork like that where if
23 somebody takes possession of something that is a county
24 device, that they sign it -- they sign for it?

25 A We started something in the last couple of

1 years where if it's -- since I deal with technology and I
2 deal with the -- like, cellular accounts, if it's a -- an
3 iPad or --

4 Q You do the what?

5 A Cellular.

6 Q Oh, okay.

7 A Cellular accounts. There was an iPad or a
8 cell phone that we give out to the employees, we'll have
9 them sign something. But that's only been in the last
10 couple of years. Usually if there's a laptop or a
11 computer that departments get, they might have them sign
12 them out. But it doesn't go through my office.

13 Q Okay. Do you know if this individual iPad was
14 ever assigned to Chaz Galloway?

15 A There's probably not, like, any paper record
16 of it. Because we wasn't doing it back then. Because I
17 believe this iPad, when we first ordered it, was for a
18 commissioner.

19 Q Okay.

20 A And then when he turned it back in, that's
21 when we just put it on a shelf. When he was in
22 administration, I must've just got it and, Hey, do you
23 need an iPad to use or he requested one. And I said we
24 have one here on the shelf. And I must've gave it to
25 him.

1 Q Okay. But there's no, like, who has
2 possession of this iPad and paperwork?

3 A I don't believe he ever signed for it.

4 Q Or who's -- who's -- especially if it's
5 something that's movable.

6 A Uh-huh.

7 Q Nothing like that?

8 A From this iPad, no, ma'am.

9 Q How do you keep track of who has what then?
10 Was that just kind of a -- is it so small that you kind
11 of know?

12 A Well, with it -- what we take care of in my
13 department, we have an online portal that has all of your
14 equipment in there.

15 Q Okay.

16 A And it's assigned to them, and they have a --
17 an actual cell phone number attached to their device.
18 Kind of tracking in the portal because it keeps track
19 of -- like, if Verizon or FirstNet.

20 Q Okay.

21 A And like I said, recently we started having
22 people -- we write down the IMEIs, and we have people
23 sign for it. But that was, like, two or three years ago
24 we started doing that.

25 Q So at the time that Mr. Galloway would've had

1 any kind of possessory interest over this iPad, that
2 would not have been happening?

3 A No, ma'am.

4 Q Okay. Do you recommend that individuals who
5 have a personal iCloud account use that iCloud account on
6 government devices?

7 A No, you shouldn't do that.

8 Q Why not? It's not a trick question. Why not?

9 A Well, you shouldn't have your personal
10 information on county equipment.

11 Q Is it fair to say that there's no privacy
12 rights on county equipment?

13 A I don't know if I'd be the expert in this kind
14 of stuff.

15 Q Yeah.

16 A I don't have an opinion on that.

17 Q Are you aware that there's part of the County
18 handbook that says that no government employee should
19 consider portions -- I know it's 2.23. It's 2.23, and I
20 can -- "E-Mail users have no expectation of privacy in
21 the content of their e-mail. All e-mail, whether
22 personal, transitory, or public record is subject to
23 inspection by the Walton County Board of County
24 Commission Administration." So basically your personal
25 business could end up on the county computer and then

1 we've got Florida Public Records laws.

2 A Oh, yeah, yeah.

3 Q What is your understanding about what you
4 would see in somebody's, like, Find My app here if you
5 were logged in to another device? Would you be able to
6 see it?

7 A So if I was -- can you clarify that?

8 Q Okay, let's say I was Chaz and I logged in
9 with my personal iCloud account in this iPad. Would I be
10 able to tell that on my phone?

11 A You should be able to see every device that
12 your iCloud is signed into.

13 Q Okay. And what I noticed, and I considered
14 doing it, was that you could essentially -- I could
15 remove this MacBook from my account, right, or I could
16 erase it entirely, right?

17 A That's what it's showing right there, yes,
18 ma'am.

19 Q Okay. Do you know if both of those were
20 options for Mr. Galloway?

21 A I didn't look into the Find My app.

22 Q At all?

23 A On the iPad, no, ma'am.

24 Q Okay. No, I was just wondering if both were
25 -- if there's something that would make one or both of

1 those an option for him.

2 A I'm not sure.

3 Q Okay. During the time frame that Charles
4 Galloway was working for the Walton County Commission, do
5 you know if he was using these alternative apps to
6 complete county business? Like, he was using Flocksy to
7 work on county business, right?

8 A Yes.

9 Q Was he outsourcing work that was assigned to
10 him?

11 A Yes.

12 Q Okay. How do you know that?

13 A Well, I didn't find out until after he was
14 gone.

15 Q Sure.

16 A But when I logged into the Flocksy account,
17 you could see all the videos that he had posted on the
18 Facebook -- well, the County Facebook page that they had
19 completed it.

20 Q So he had basically -- he was, what, receiving
21 a salary from Walton County and was then using Walton
22 County's purchase card to pay for a Flocksy account?

23 A Yes.

24 Q That was then doing his work for him?

25 A Yes.

1 Q So was Walton County paying for Flocksy and
2 Chaz at the same time?

3 A That's what it appears.

4 Q Okay. Do you know if anybody authorized that?

5 A I don't know if anybody did.

6 Q Okay. You know -- that's -- that's not your
7 -- authorizing that would not be in your wheelhouse or
8 your duties?

9 A No, ma'am.

10 Q Okay. Do you have any idea who might've
11 authorized it if they did?

12 A No, ma'am.

13 Q Okay. Let's see. Let me just check my notes
14 here. Did Chaz Galloway ever give you his password and
15 tell you to log out for him or anything like that?

16 A I don't -- I don't think so.

17 Q Are you close friends with Mr. Galloway?

18 A No.

19 Q Okay. How -- I mean, work colleagues, or?

20 A I just know him from whenever he used to come
21 to the board meetings and then he got hired.

22 Q Okay.

23 MS. BOGENSCHUTZ: That's pretty much all I've
24 got so far.

25 DIRECT EXAMINATION

1 BY MR. WEBSTER:

2 Q So you attend all the board meetings
3 basically?

4 A Unfortunately, yes.

5 Q Right. From a technology standpoint --

6 A Yes, sir.

7 Q -- I guess you have to be there, right?

8 A Yes.

9 Q Is it -- is it unusual -- and I honestly don't
10 know the answer to this question. Is it unusual for a
11 county employee to log into their Apple account on a
12 county device? I mean, is that something you think
13 happens frequently?

14 A I don't think it happens frequently, but I --
15 I tell them to -- to create an Apple account with their
16 county e-mail address.

17 Q Right. So they have their -- a separate Apple
18 account for the county e-mail address?

19 A Yes, sir.

20 Q Did Mr. Galloway do that to your knowledge?

21 A I'm -- I'm not sure.

22 Q Okay. Now, would you have the password to
23 their county Apple account?

24 A No, sir.

25 Q Would you be able to access it?

1 A No, sir.

2 Q Okay. So what's the purpose of you telling
3 them to do that that way?

4 A That way it's -- I try to tell people to only
5 do work-related things on county equipment.

6 Q Yes, sir. Okay. So if he had created a
7 county Apple account, it wasn't -- it wasn't logged into
8 that account when you accessed that iPad?

9 A Not the -- I can't remember what the iPad
10 account was that was logged in. I -- I don't think it
11 was a county account.

12 Q Yes, sir. But you didn't see two. You didn't
13 see the one that you saw and then a separate one that was
14 for the County?

15 A No, sir.

16 Q Okay. If I understood you -- and I'm not
17 technologically savvy, so -- but if I understood your
18 testimony, and I don't use Apple, but if I understood
19 your testimony, it seems like there may have been two
20 different ways that Mr. Galloway could've got out --
21 logged out of the iPad with his Apple account remotely,
22 right? Is that fair? He could've erased it or removed
23 it altogether?

24 A I don't know if he could've erased it. I was
25 under the assumption, because I've done it before in my

1 own things, that you could remove -- remove it. Like,
2 you could log into your Apple account online and remove a
3 device.

4 Q Okay.

5 A I'm not sure if he could erase it or not.

6 Q So do you remember if you told him to come
7 down or if you told him just get it out and log out?

8 A I told him he just needed to log out. I don't
9 remember specifically telling him to come to the office
10 to do it. I believe he mentioned that.

11 Q Okay. Is it possible that you did tell him to
12 come down because you thought he might want to delete
13 some of the personal stuff off of the -- the county
14 server?

15 A (Witness shakes head.)

16 Q No?

17 A No, sir.

18 Q Okay. Now, you certainly believed you had the
19 authority to look at the -- view the contents of that
20 iPad?

21 A Well, it was a county iPad.

22 Q Okay.

23 A Yes, sir.

24 Q All right. And then when you saw things that
25 you thought involved -- may involve county information,

1 you went to my client. I represent Quinn Robertson. Is
2 that true?

3 A Yes, sir.

4 Q Okay. And you certainly believed that
5 Mr. Robertson at that time, as the county administrator,
6 had the authority to -- was authorized to look at the
7 contents of that iPad, correct?

8 A Yes, sir.

9 Q Okay. I mean, did you feel like you were
10 illegally eavesdropping on Mr. Galloway's private
11 messages and stuff when you were accessing the iPad?

12 A I didn't think I was, no, sir.

13 Q Okay. Did you think my client was when he
14 looked at the contents?

15 A Not whenever I initially gave it to him, no,
16 sir, when I showed him what I saw.

17 Q Okay. Do you feel like you took every
18 reasonable step that you had available to get
19 Mr. Galloway to log out?

20 A Yes, sir.

21 Q Okay. Now, when that data is uploaded to the
22 iPad, is it also synced to, like, a main server or a
23 county server or anything like that, or does it just stay
24 on that device?

25 A Well, what type of data?

1 Q Like, his -- all of his iCloud information.

2 A It would be on the device and the Cloud
3 server. So you could sign into another device and you
4 could have, like, a replica.

5 Q Okay. And, sir -- I mean, are you familiar
6 with Section 2.8, which is titled Communication and
7 Technology in the human resources policy manual?

8 A I mean, somewhat, yes, sir.

9 Q Okay. Are you familiar that it -- basically
10 the employees are informed that the IT department
11 monitors internet activities?

12 A Yes, sir.

13 Q Okay. Would that be your job, or?

14 A No, sir. That's what I meant earlier when I
15 said technology. We have -- there's an IT department
16 that works for the clerk of courts, and they manage all
17 of our IT for the County.

18 Q Okay. And they're warned that any improper
19 use is reported to the employee's department director,
20 correct?

21 A Yes, sir.

22 Q Okay. And then it says, "As an employee of a
23 government organization all messages, web pages, files,
24 and other documents accessed using internet services are
25 subject to public records requests." Correct?

1 A Yes, sir.

2 Q Okay. They're also warned that it's the
3 responsibility of each individual employee to utilize
4 their computers and their electronic devices in an
5 effective, ethical, and lawful manner, correct?

6 A Yes, sir.

7 Q All right. And do you think it was ethical
8 for Mr. Galloway to have all of his Apple account
9 information being synced to the county iPad?

10 A I don't know if I'd say that's unethical.

11 Q Okay. I mean, were you aware that -- that
12 there were possibly some profane kind of images and
13 videos on -- that were synced to the iPad?

14 A No, sir.

15 Q You weren't aware of that?

16 A No, sir.

17 Q Is it true that the county employees are also
18 advised that they are prohibited to use any of their
19 systems to transmit or receive inappropriate messages, to
20 access inappropriate information or to harass or annoy
21 another party?

22 A Yes, sir.

23 Q Okay. And then they're warned inappropriate
24 messages and information include but are not limited to
25 those that are for personal benefit and those involving

1 discriminatory, hostile, suggestive, obscene, or
2 otherwise unsuitable language? You are familiar with
3 that?

4 A Yes, sir.

5 Q Okay. So if there were, let's say,
6 sexual-type videos or images that Mr. Galloway had in his
7 Apple account that were synced to the iPad, would that
8 have been in violation of this policy?

9 A Yes, sir.

10 Q Okay. Would you agree with me that text
11 messages are electronic messages?

12 A Yes, sir.

13 Q Would you agree with me that iMessages are
14 also electronic messages?

15 A Yes, sir.

16 Q So do you believe that the -- the human
17 resources policy manual fairly warned Mr. Galloway that
18 if he put his personal information on the county device
19 that it was going to be subject to view by county --
20 other county administrators?

21 A Yes, sir.

22 Q Okay. Isn't it true, sir, that the human
23 resources policy manual also advises county employees
24 that they are responsible for the periodic deletion of
25 personal and transitory messages so that the e-mail

1 system is not overburdened?

2 A Yes, sir.

3 Q Okay. So if he had information on that device
4 that he knew was not county business, he could delete it
5 himself, and he actually had a duty to do so; is that
6 fair?

7 A Yes, sir.

8 Q If Mr. Galloway had deleted the information in
9 his -- let's say from home, not from the county iPad, but
10 if he deleted the information from his iCloud, would it
11 have been deleted also from the iCloud account that you
12 were accessing here on the iPad?

13 A It should've and if it's synced up and still
14 connected, yes, sir.

15 Q Okay. And so when you first discovered -- I
16 believe the records show that on May 24th you first sent
17 a Facebook message to Mr. Galloway advising him that his
18 -- the iPad he had was still logged into his Apple
19 account.

20 A I'm trusting you on the time. I don't
21 remember the dates.

22 Q That's -- the records show, I believe, it's
23 May 24th, 2023, was your first message.

24 A Yes, sir.

25 Q And you basically said, Hey, you need to come

1 down here and log out, right?

2 A Yes, sir.

3 Q According to the records we have, May 25th,
4 the very next day, 2023, you sent another message because
5 I think he ghosted you.

6 A Okay.

7 Q Does that sound --

8 A I may have done it twice, yes, sir.

9 Q And actually I think -- then you did it again
10 on the 25th because -- or the 26th -- that's what the
11 records we have suggest.

12 A Okay.

13 Q Kind of three days in a row you sent him
14 messages. And at one point you even said, look, give me
15 a date that works good for you to come down and meet.
16 Does that kind of refresh your recollection of what you
17 may have --

18 A Yeah, I forgot, but you saying that I -- I
19 could have, yeah.

20 Q Okay. And then it -- it appears that maybe
21 Mr. Rowlands would occasionally look at the device after
22 that. But you don't -- it doesn't seem like you had much
23 involvement with it until December and that was -- or
24 November, and I believe that's when you discovered the...

25 A Oh, was it that long? That's a long time.

1 Q Okay. But to your knowledge Mr. Galloway
2 didn't take any steps from when you first contacted him
3 about this problem and until when it blew up in the
4 county commission meeting to log his device out, correct?
5 Or his --

6 A Yes, sir.

7 Q Thank you. And then is it -- am I correct
8 that the human resources policy manual also warns the
9 employees that all e-mail, whether personal, transitory,
10 or public record is subject to inspection by the Walton
11 County Board of County Commissioners Administration?

12 A If that's what it says, yes, sir.

13 Q Okay. Sorry, I had to go over the records.
14 There's a lot of paper. Sir, when did you first learn
15 that -- kind of this -- these things had been referred to
16 the sheriff's office for a criminal investigation?

17 A Which part are you talking about?

18 Q The -- the allegation by Mr. Galloway that
19 people basically were hacking or had stolen his iPad or
20 were accessing his Apple account.

21 A I didn't realize that Jared went to the
22 authorities about the iPad.

23 Q I'm showing you what I Bates stamped as
24 QMR-267. This is like a -- a face page for an
25 investigation. Were you aware that you were originally

1 identified kind of as a suspect?

2 A No, sir.

3 Q All right.

4 A For?

5 Q Mr. Galloway's criminal complaint that his
6 iPad had been stolen and that somebody was using --
7 accessing his stolen iPad and basically invading his
8 privacy and taking his personal text messages.

9 A I wasn't aware of that, no sir.

10 Q Okay. All right. I mean, at any point do you
11 feel like you did anything wrong by accessing the county
12 iPad?

13 A No, sir.

14 Q Did you feel like it was your job to do that?

15 A My job?

16 Q Yes, sir. I mean, is it part of your
17 professional duties when you're -- Mr. Rowlands came to
18 you and said, Hey, somebody's...

19 A Right, to -- ask them to sign out, yes, sir.

20 Q Okay. And kind of consistent with that --
21 that criminal complaint, do you recognize kind of this
22 screen here? This is my Bates Page 600.

23 MR. MITCHELL: Is that Defense Exhibit 2 from
24 earlier?

25 MR. WEBSTER: Yes, it probably is. I think it

1 was 1 because I think I did...

2 MS. BOGENSCHUTZ: You did two pages.

3 MR. WEBSTER: It'll be Mr. Cook's.

4 BY MR. WEBSTER:

5 Q Are you kind of familiar with that screenshot,
6 if you will?

7 A Yeah, that's going to be our website.

8 Q Okay. Where you're identified as an employee?

9 A Yes, sir.

10 Q Okay. Were you aware that Mr. Galloway had
11 sent this to the sheriff's office with that note that he
12 put on there?

13 A Was I aware that he reached out to the
14 Sheriff?

15 Q And sent this to the Sheriff with that note?

16 A No, sir.

17 Q Okay. But this note -- it seems like it's
18 pretty consistent with your -- your recollection of what
19 occurred, that you basically told him six months earlier
20 that his system was logged in?

21 A Yes, sir.

22 Q Okay. And this was produced to us by the
23 State in discovery, Mr. Cook. And it's Bates Number 730
24 in my book, but do you -- do you recognize that document?

25 A Yeah, I think that's -- that was in a e-mail

1 or that's where -- that's where we purchased the iPad
2 from T-Mobile.

3 Q Okay. So that was -- when you went back and
4 researched the details of the iPad, you were able to
5 confirm like when it was purchased and everything?

6 A Yes, sir.

7 Q All right. I'm just going to read into the
8 record here that it was -- I mean, what's the difference
9 between SIM and IMEI? Do you know?

10 A The SIM number is going to have -- that's what
11 your phone number is going to be attached to. And the
12 IMEI is the -- the marker for the device.

13 Q So that's more of a serial number, the IMEI?

14 A Yes, sir.

15 Q Okay. So this one has IMEI Number 355803.

16 MR. MITCHELL: Mr. Webster, would you like for
17 me to make a copy of that?

18 MR. WEBSTER: Yeah, I would love that.

19 MR. MITCHELL: And then you can just make that
20 Number 3?

21 MR. WEBSTER: Yes, sir. We'll do that. It
22 will be Exhibit Number 3.

23 MR. MITCHELL: All right. So we'll just go
24 off the record for just a minute.

25 MR. WEBSTER: Thank you.

1 (Exhibit No. 3 was marked for identification.)

2 BY MR. WEBSTER:

3 Q Okay. And I believe that you -- they also
4 produced an e-mail where you, I believe, sent that sheet
5 to Investigator Marthinsen, which is spelled
6 M-A-R-T-H-I-N-S-E-N, with the Walton County Sheriff's
7 Office. Does that sound familiar?

8 A I believe I sent him a couple of documents.

9 Q A couple of documents?

10 A I don't remember exactly what it was. Yes,
11 sir.

12 Q But that may have been --

13 A Yes, sir.

14 Q -- probably one of the ones you would've sent?

15 A Yes, sir.

16 Q Do you -- and I think co-counsel may have
17 asked this question, but do y'all have a log -- like,
18 when you assign an iPad to an employee, is there a log --
19 like, it says this device was assigned --

20 A What we have now is a Walton County Equipment
21 Agreement. It's going to have a bunch of words. And
22 this can be used for public records. A couple of
23 paragraphs. And then we have the IMEI. Then they sign
24 for it now.

25 Q Okay.

1 office?

2 A He had an office, but it was -- they like to
3 move offices around, so it was a different office. But
4 the equipment that was -- like our spare equipment, we
5 just had it on Jeremy's shelf.

6 Q Okay. All right. So after the May time frame
7 you notified Chaz, the iPad stayed in Jeremy's office?

8 A Yes, sir.

9 Q Until when?

10 A I'm guessing it was a lot longer than I
11 thought. It was -- apparently whenever we thought about
12 it again or Jeremy asked to use it again, like, well,
13 let's check it, I guess -- I don't remember the time
14 frame.

15 Q Okay. And that's kind of what I'm trying to
16 find out. Jeremy's the one that said, Hey, let's check
17 it, or was that something you came up with, Hey, let me
18 see, or was it something someone directed you to do?

19 A It was me or Jeremy that came up with, Hey,
20 let's look again to see.

21 Q All right. And when you found out he hadn't
22 logged out and you -- I believe you said that it --
23 Mr. Robertson's name or Quinn popped up on one of the
24 messages and so you thought you needed to provide it to
25 your supervisor?

1 A That's right.

2 Q Okay. After you did that where did the iPad
3 go at that point?

4 A I'm pretty sure it stayed with Mr. Robertson.

5 Q Okay. Did -- did Mr. Robertson say leave the
6 iPad here, or did you say I'm going to leave it? Explain
7 to us how that came to be.

8 A I don't -- I don't remember what was said.

9 Q Okay.

10 A I just remember it stayed with him.

11 Q Okay. Did -- was there anyone else in the
12 room when you presented or showed Mr. Robertson that?

13 A I don't -- I don't believe so.

14 Q Okay. At any point after you initially
15 showing the iPad did the iPad come back into your
16 possession?

17 A He did ask -- he brought it back to us.

18 Q Hang on one second. Who's he?

19 A Mr. Robertson.

20 Q Okay. Mr. Robertson brought it back to who?

21 A He brought it back to me, asking us if we
22 could make a backup of it.

23 Q Okay. Is that something you normally do in
24 your day-to-day operations, you personally?

25 A No, sir.

1 Q All right. Did you ask why or was it this is
2 the county administrator, I'll just tell him I can't and
3 move on?

4 A Oh, we tried to.

5 Q Oh, you tried to?

6 A Yeah, and it didn't -- I can't remember -- it
7 didn't work.

8 Q Okay. Did you ask why you wanted a backup
9 copy or why Mr. Robertson wanted a backup copy?

10 A No, sir.

11 Q Okay. After the backup copy didn't work are
12 you aware of where the iPad went from there?

13 A Back to Quinn.

14 Q Okay. Did you have any information related to
15 whether Quinn was actively reviewing text messages from
16 the iCloud account?

17 A No, sir.

18 Q Okay. Did you ever have any conversations
19 with Mr. Joseph Turner about any of the iCloud account
20 contents that were on that iPad?

21 A Not that I recall.

22 Q Okay. Did anyone from the sheriff's office
23 ever inform you not to be looking at the iCloud contents?

24 A Not that I remember.

25 Q Okay. Did you ever become aware of anyone

1 from the sheriff's office discussing with -- we'll start
2 with Mr. Turner, Joseph Turner -- about not reviewing the
3 contents of the iPad account?

4 A I don't remember anybody saying anything of
5 that nature.

6 Q Okay. Same question for Mr. Robertson. Do
7 you ever recall anybody from the sheriff's office telling
8 them not to review those items?

9 A Not that I recall.

10 Q Okay. Do you recall anyone from the county
11 attorney's office ever giving an opinion as to whether
12 those were public record or private messages?

13 A I don't recall ever talking with the county
14 attorney's office about any of this.

15 Q Do you recall ever having any conversations
16 with Mr. Robertson about whether the county attorney's
17 office had ever told him not to be reviewing them?

18 A No, sir.

19 Q All right. Same thing for Mr. Turner. Did
20 you have any conversations with Mr. Turner about where he
21 may or may not have told you the county office -- or
22 county attorney's office told him to quit reviewing those
23 messages?

24 A No, sir.

25 Q Okay. So in a nutshell you found that the

1 original message, if you will -- we understand it's not
2 the original message, but you found the message that
3 identified Quinn, you presented the iPad to Quinn, Quinn
4 asked you to make a backup copy, and then it went back to
5 Quinn, that's your involvement, if I understand you
6 correctly?

7 A Yeah.

8 Q Okay. And I think you answered this earlier,
9 but I want to -- I want to make sure I'm -- did -- do you
10 call him Chaz or Charles?

11 A Chaz.

12 Q Okay. Did Chaz ever give you any password via
13 text, Facebook message, e-mail, anything like that?

14 A Not that I can recall.

15 Q Okay. All right. I'm not saying he did or
16 didn't. I just want to make sure I know your answer.
17 All right. Is there anything else that any of us three
18 have asked that you think is significant? Anything we
19 haven't asked that you think is significant about the
20 facts of this case or circumstances?

21 A No, sir.

22 Q All right.

23 MR. MITCHELL: Well, that's going to open it
24 back up for them if they have any follow-up. I
25 don't know. They may or may not.

1 THE WITNESS: Okay.

2 REDIRECT EXAMINATION

3 BY MS. BOGENSCHUTZ:

4 Q Just to go back. Are you -- you're familiar
5 with this handbook again, the employee handbook?

6 A Yes, ma'am.

7 Q There should be -- there should not be any
8 expectation of privacy with respect to the use of this
9 equipment, referring to computers. Is -- is it common
10 for the county administrator to go through e-mails sent
11 and received by county employees?

12 A Not that I'm aware.

13 Q Do they have the ability to do that?

14 A I believe so.

15 Q They have the right to do that?

16 A According to our handbook, I think, if it's
17 county business.

18 Q What about if they're trying to -- if there's
19 perhaps an investigation into something similar to what
20 Mr. Galloway was accused of?

21 A I mean, I believe they have the right to go
22 through county e-mails.

23 Q Okay. Do you -- well, I'll -- I'll just ask
24 you straight. I don't mean anything by this. But is
25 Chaz Galloway a -- like a trustworthy person? Do you

1 think that he is -- do you think -- no, let me -- let me
2 rephrase this a little bit better. Would you say that he
3 has a reputation in the Walton County community for being
4 honest?

5 A No.

6 Q Would you think that he has the reputation of
7 being the opposite of that, dishonest?

8 A Yes, he has that reputation.

9 Q Okay. Why would you say that? I mean, I just
10 want to know, like, what dataset you're relying on to say
11 that.

12 A Well, I can't factually point to things --

13 Q Yeah.

14 A -- but in the community -- you know, the
15 social medias, you know. So you take that with a grain
16 of salt. That's where you see --

17 Q Did he ever try --

18 A -- both sides.

19 Q Yeah. Did you ever -- did he ever try to add
20 you to any of these listservs where he's sending out
21 these massive e-mails?

22 A I don't think he ever tried to add me.

23 Q You're lucky. Have you seen some of these
24 e-mails that he sent out or --

25 A I don't believe so.

1 Q -- that he's blogged about or anything like
2 that?

3 A I don't believe so.

4 MS. BOGENSCHUTZ: I think that's all I have.

5 REDIRECT EXAMINATION

6 BY MR. WEBSTER:

7 Q So, Investigator Marthinsen, he kind of did a
8 summary of your sworn interview. Do you recall giving a
9 sworn statement to the -- to the investigator for the
10 Walton County Sheriff's Office?

11 A I guess it was sworn. He -- he kind of asked
12 me and then at the end did the thing. I don't know if
13 that's the way it's supposed to go, but.

14 Q Probably not. According to his summary he
15 said, "I went to the county administration building and
16 interviewed Jason Cook. In that sworn audio recorded
17 interview Cook advised the following: Prior to assigning
18 the iPad to Jeremy Rowlands -- and Rowlands is
19 R-O-W-L-A-N-D-S -- it sat unused in his office. After
20 assigning it to Rowlands, Rowlands made Cook aware that
21 Galloway's personal Apple accounts were linked to the
22 iPad." So far does that sound accurate?

23 A Yes, sir.

24 Q "Rowlands kept possession of the iPad. This
25 was in May. Cook knows this because his Facebook

1 Messenger app shows that he contacted Galloway in May
2 requesting he come in and delete his personal
3 information." Does that seem also kind of consistent
4 with what you recall?

5 A Yeah, I just don't -- I don't remember asking
6 him to come in.

7 Q Okay. "Cook claimed it is known that the
8 Apple account logged into a device must be unlogged from
9 that device in order to completely the device {sic}. It
10 is the reason for Cook's request." Does that seem
11 consistent with your understanding of...

12 A Yes, sir.

13 Q "Cook specifically stated his Messenger
14 account shows that he contacted Galloway and Galloway did
15 not respond. Cook then contacted Galloway again, which
16 Galloway responded requesting a date to meet. Cook
17 responded a third and final time with a possible date.
18 Galloway never responded. Cook e-mailed me a screenshot
19 of the messages. They were dated May 24th, 2023, May
20 25th, 2023, and twice on May 26th, 2023 respectively."

21 I know you don't have a perfect memory of all
22 this, it's been a while --

23 A Yes, sir.

24 Q -- but does that just sound generally kind of
25 how --

1 A Yes, sir.

2 Q -- you recall things occurring? It goes on to
3 say you testified or you told the investigator that
4 Rowlands kept possession of the iPad in his office and
5 would periodically check to see if Galloway had removed
6 his personal information. Approximately a month or two
7 ago, open paren, middle of November, closed paren,
8 Rowlands showed Cook that Galloway's personal messages
9 contained, quote, county information, period, close
10 quote.

11 What would you have meant by county
12 information?

13 A Must've been Quinn's name.

14 Q Okay. But is it possible there was other
15 information you thought might be county -- related to the
16 County?

17 A I -- I can't...

18 Q If you can't remember, it's fine. It's fine.
19 It's fine.

20 A Yeah.

21 Q But in essence, were you -- are you familiar
22 with the duty to preserve public records?

23 A Oh, yeah. Yes, sir.

24 Q Was that one of the reasons why you also
25 wanted the county administrator to be aware of that, in

1 case there were public records contained within those
2 messages?

3 A Yeah, you don't want to delete them until the
4 retention period is up, yes, sir.

5 Q Okay. And the only way to determine whether
6 or not there's public records is to actually go in and
7 review the materials, correct?

8 A Right. And that's usually done by the legal
9 department, yes, sir.

10 Q But the county administrator would have the
11 authority to do that, correct?

12 A Yes, sir.

13 Q Okay. It says, "Cook took possession of the
14 iPad and gave it to Robertson. Robertson asked Cook to
15 show him the information on the iPad that was of concern,
16 which Cook did. Cook stated Turner or Robertson brought
17 the iPad back to Cook and asked him to back up the iPad."
18 Does that sound so far kind of consistent?

19 A Yes.

20 Q Were you -- did you realize that Mr. Robertson
21 and Mr. Turner had questions about whether or not the use
22 of all these apps was appropriate? Were you -- did you
23 understand that?

24 A No, sir.

25 Q Okay. Do you think --

1 A You talking about -- which apps?

2 Q The Flocksy and the -- the Monday and --
3 primarily I think the Flocksy. To do his county business
4 he purchased an app that would do the work for him
5 essentially, correct?

6 A Well -- can you restate that question?

7 Q Yeah, was it -- you testified earlier -- I
8 think it was Flocksy that he made the videos?

9 A Uh-huh. Yeah, I don't -- I don't know when
10 the time frame is where they knew about Flocksy though.

11 Q Okay. All right. You don't know if it was
12 then or later?

13 A Yes, sir.

14 Q Okay. If there were -- if there were public
15 records contained on that, within his Apple Cloud
16 information, the County would have a -- a responsibility
17 to preserve those, wouldn't -- is that true?

18 A If it's county business inside a personal
19 account, unfortunately, yes.

20 Q Yeah. Okay.

21 A That's why I go back to -- that's why I tell
22 people don't put your private stuff on any county iPad
23 because it becomes public record.

24 Q And then it says, "Cook attempted to back up
25 the iPad a couple of times, but the iPad tried to reset

1 itself."

2 A Yes, sir.

3 Q Okay. "And after approximately four attempts
4 to back up the iPad with no success they were able to
5 restore the iPad. The iPad was given back to Robertson
6 or Turner. Cook had no further actions or conversations
7 concerning the iPad and it was not in his possession."
8 Is that fair?

9 A Yes, sir.

10 Q Okay. Were you working with the County in
11 your current role when the investigators came and asked
12 that the iPad be turned over to them so that they -- the
13 sheriff's office could begin their investigation?

14 A I was working in my current role, but I don't
15 know the time frame that they came and got the iPad.

16 Q Were you aware that -- do you recall when
17 Mr. Sunday came -- became the county administrator after
18 Mr. Robertson left?

19 A I don't recall the time frame, but it was
20 after Quinn.

21 Q You recall that?

22 A Yes, sir.

23 Q Okay. Would you be surprised that -- that
24 Mr. Sunday, as the county administrator, would sign a
25 consent form authorizing the sheriff's office to search

1 the device?

2 A I know that --

3 MS. BOGENSCHUTZ: FDLE.

4 A Yeah, FDLE, Mr. Riddick, got up with me and
5 sent the document to me, and I had Stan go sign it to
6 release the iPad to them.

7 BY MR. WEBSTER:

8 Q So you clearly thought that Mr. Sunday was
9 authorized to give that iPad away for a full search?

10 A Yes, sir.

11 Q Okay. And I think the consent form said it
12 was his property. Do you recall that?

13 A Whose property?

14 Q Mr. Sunday had said my property underneath his
15 signature. Were you aware of that?

16 A I don't -- I don't remember it saying that.

17 Q That's fine. I don't expect you to either.

18 MR. WEBSTER: All right. Thank you. I have
19 nothing further.

20 THE WITNESS: Yes, sir.

21 MR. MITCHELL: All right. Appreciate you
22 coming in early, man.

23 THE WITNESS: No problem.

24 MR. MITCHELL: Thank you.

25 THE WITNESS: Yes, sir.

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COURT REPORTER: Did you want to order?

MR. WEBSTER: Yes.

MS. BOGENSCHUTZ: Yep.

COURT REPORTER: Thank you.

(Conclusion of the deposition.)

UNOFFICIAL
DOCUMENT

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, JASON COOK, 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
JASON COOK; 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, FPR
Stenographic Court Reporter
Notary Public-State of Florida

	10:22;26:5;40:2; 43:10;47:25;48:10; 50:17,24	47:6;50:3	20;35:3;37:3,20; 39:15,17,20,21;40:13; 42:4,24;43:4;48:17, 17;49:21,24;50:4,5	43:17;49:3,18
{		apps (3) 21:5;48:22;49:1		C
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