

1 IN THE CHANCERY COURT  
 2 FOR HICKMAN COUNTY,  
 3 AT CENTERVILLE

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4 ANNA DEW KENNEDY, )  
 5 Plaintiff(s), )  
 6 V. ) 24-CV-7939  
 7 MATTHEW DEAN KENNEDY, )  
 8 Defendant(s). )

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12 The Deposition of:  
 14 MATTHEW DEAN KENNEDY  
 15 June 20, 2025

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1 The deposition of MATTHEW KENNEDY  
 2 was taken by agreement, at the Hickman  
 3 County Courthouse, Centerville,  
 4 Tennessee, on June 20, 2025, pursuant to  
 5 the provisions of the Tennessee Rules of  
 6 Civil Procedure.  
 7 All formalities as to notice,  
 8 caption, certificate, reading and signing  
 9 of the deposition are waived. All  
 10 objections, except as to the form of the  
 11 questions, are reserved to the hearing.

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12 **APPEARANCES:**

13 For the Plaintiffs:

14 Hilary H. Duke, Esq.  
 15 210 East College Street  
 16 Dickson, Tennessee 37055

17 For the Defendants:

18 Douglas T. Bates, IV, Esq.  
 19 203 East Public Square  
 20 Centerville, Tennessee 37033

21  
22 Also Present: Anna Kennedy  
 23  
24  
25

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6 EXHIBITS  
 7  
 8 (No exhibits were entered.)  
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1 MATTHEW KENNEDY,  
 2 having been first duly sworn or affirmed,  
 3 testified as follows:  
 4 DIRECT EXAMINATION  
 5 **BY MS. DUKE:**  
 6 **Q** Mr. Kennedy, I'm Hilary Duke. I  
 7 represent Ms. Anna Kennedy today. Have  
 8 you ever given a deposition before?  
 9 **A I don't -- I don't think so.**  
 10 **Q** Okay. Understand that when  
 11 you're answering your questions today,  
 12 instead of saying uh-huh or huh-uh, you  
 13 need to affirmatively state yes or no.  
 14 Don't do your head up and down or side  
 15 to side. You need to affirmatively  
 16 answer the question yes or no. You  
 17 understand that, sir?  
 18 **A Yes.**  
 19 **Q** And you understand that you're  
 20 under oath today and that you've got to  
 21 tell the truth, okay, or you can be  
 22 criminally charged for not telling the  
 23 truth. Do you understand that?  
 24 **A Absolutely.**  
 25 **Q** Okay. So if you would, please,

1 state your full name for the record.  
 2 **A Matthew D. Kennedy.**  
 3 **Q** Would you spell your middle  
 4 name?  
 5 **A D-E-A-N.**  
 6 **Q** Okay. So it's Dean?  
 7 **A Dean.**  
 8 **Q** Okay. And where do you  
 9 currently reside?  
 10 **A I currently reside at a -- I**  
 11 **guess a park. Not really a park, but**  
 12 **a -- my camper is in a -- on a man's**  
 13 **property in Bell Buckle, Tennessee.**  
 14 **Q** Okay. And what is that address?  
 15 **A** [REDACTED]  
 16 **Q** And how long have you been  
 17 there?  
 18 **A Probably eight, nine months.**  
 19 **Q** Okay. And where were you prior  
 20 to that?  
 21 **A Another place in Shelbyville.**  
 22 **Q** What was that address?  
 23 **A** [REDACTED]  
 24 **Q** Is that Shelbyville?  
 25 **A Yes.**

1 **Q** Okay. And how long were you  
 2 there?  
 3 **A Probably about four months.**  
 4 **Q** Okay. And where were you before  
 5 that?  
 6 **A 6702 Piney River Road.**  
 7 **Q** Have you stayed anywhere else  
 8 overnight other than those three places  
 9 in the last year and a half?  
 10 **A Actually stayed with my son when**  
 11 **I first left the marital home.**  
 12 **Q** Okay. Where was that?  
 13 **A It was in Hartselle, Alabama.**  
 14 **Q** What's the address?  
 15 **A I'd have to look it up.**  
 16 **Q** Do you know the street?  
 17 **A No, ma'am, I don't.**  
 18 **Q** Okay. And at any of these  
 19 addresses, has any other person resided  
 20 with you or stayed overnight with you?  
 21 **A No.**  
 22 **Q** Okay. Well, presumably in the  
 23 Hartselle address, your son was there.  
 24 Is that right?  
 25 **A Well, Hartselle, yes. And my --**

1 **my son, my granddaughter, his**  
 2 **stepdaughter and his wife.**  
 3 **Q** Okay. And at any of the other  
 4 addresses, based on what you've just  
 5 said, was there anybody else that stayed  
 6 the night or resided with you at those  
 7 addresses?  
 8 **A No.**  
 9 **Q** Okay. Has anybody come to those  
 10 places aside from yourself?  
 11 **A Just the people that I was**  
 12 **renting from.**  
 13 **Q** Okay. And who were you renting  
 14 from?  
 15 **A I'm trying to think of the first**  
 16 **guy's name. It's been a while.**  
 17 **Q** Is this at the 1314 Highway 30?  
 18 **A Yeah, it's -- it's been a while.**  
 19 **I don't -- I can't pull his name off the**  
 20 **top of my head. Randy -- I don't**  
 21 **remember his last name, I'm sorry. I**  
 22 **can get it.**  
 23 **Q** And how much were you paying for  
 24 rent there?  
 25 **A 700. Actually, 780. He rented**

1 **me a little bit of a storage space in a**  
 2 **barn.**  
 3 **Q** Did you have a lease with him?  
 4 **A No. It was month-to-month.**  
 5 **Q** And you don't remember his last  
 6 name?  
 7 **A I can get it.**  
 8 **Q** Okay. And who are you currently  
 9 leasing from at the [REDACTED]  
 10 **A That would be Lloyd Davis.**  
 11 **Q** Okay. And how much are you  
 12 paying there?  
 13 **A 650.**  
 14 **Q** And is that just to park your  
 15 camper?  
 16 **A Yeah, that's basically just to**  
 17 **park my camper.**  
 18 **Q** Do you have a lease with him?  
 19 **A No. Month-to-month.**  
 20 **Q** Have the police been called to  
 21 any of these residences when you've been  
 22 there?  
 23 **A No.**  
 24 **Q** Okay. Why did you leave the  
 25 [REDACTED] address?

1 **A It was too far out. It was a**  
2 **very hard -- it was a hard drive getting**  
3 **to my work.**

4 **Q** Okay. And so the ~~Wartrace Road~~  
5 address is closer?

6 **A It's, I would say, a little bit**  
7 **closer because I can take the interstate**  
8 **from there.**

9 **Q** How far is that from your work?

10 **A I can be there in about 30, 35**  
11 **minutes.**

12 **Q** Okay. Is there a reason why you  
13 haven't moved closer to your work?

14 **A The biggest reason is, you know,**  
15 **what they're charging for, you know,**  
16 **camper spaces in and around the area.**  
17 **I'm staying as cheap as I possibly can**  
18 **right now.**

19 **Q** Okay. Tell me about this camper  
20 that you've got. Tell me when you  
21 attained that.

22 **A I attained that -- let's see, I**  
23 **left the marital home on March 24th,**  
24 **went down to my son's in Hartselle,**  
25 **Alabama. Spent right at two weeks with**

1 **to go. It was an option. I really**  
2 **needed a truck, and I planned to take**  
3 **the marital truck when I left, but that**  
4 **was taken away from me.**

5 **Q** Okay. We'll get to that in just  
6 a second. Has anybody else besides  
7 yourself ridden in that Dodge Ram?

8 **A My son.**

9 **Q** Okay. Anyone else?

10 **A No.**

11 **Q** Okay. Have you had a  
12 girlfriend?

13 **A No.**

14 **Q** Okay. Have you had any women  
15 around you?

16 **A No.**

17 **Q** Have you spoken to any women on  
18 the phone, besides Ms. Kennedy, since  
19 your separation?

20 **A Other than the women at the**  
21 **bank.**

22 **Q** Not in normal course and scope.  
23 I mean in a love interest way.

24 **A No.**

25 **Q** Okay. Have you been on any

  
see  
p. 63

1 **him, and then I purchased the camper.**

2 **Q** Where did you purchase it?

3 **A Waverly. It was an old man and**  
4 **woman.**

5 **Q** Okay. And how much did you  
6 purchase it for?

7 **A I bought the camper and the**  
8 **truck together. Total price was 45.**

9 **Q** Okay. Is that the Dodge Ram  
10 that you've got right now?

11 **A Yeah. Bighorn.**

12 **Q** And is that paid off?

13 **A Yes.**

14 **Q** So a Dodge Ram and camper was  
15 \$45,000?

16 **A Yes.**

17 **Q** Okay. And do you have a title  
18 to both of those?

19 **A Yes.**

20 **Q** Okay. Did you speak with  
21 Ms. Kennedy about the purchase you were  
22 going to make?

23 **A We had talked about it prior to**  
24 **me leaving the marital home, you know,**  
25 **of trying to figure out a place for me**

1 dating apps?

2 **A No.**

3 **Q** Okay. Have you been on any  
4 dating apps since your marriage date?

5 **A No.**

6 **Q** Okay. Have you been on  
7 Adultfriendfinder.com?

8 **A No.**

9 **Q** Okay. Did you admit to  
10 Ms. Kennedy that you had been on  
11 Adultfriendfinder?

12 **A Prior to our marriage.**

13 **Q** Okay. And your testimony today  
14 is that you did not go back onto that  
15 website since your marriage?

16 **A Since my marriage? No.**

17 **Q** Okay. Have you been on any  
18 other dating websites that you say you  
19 have not been on since marriage?

20 **A No, ma'am.**

21 **Q** Okay. And you still subscribe  
22 to that site; is that correct?

23 **A Which site?**

24 **Q** To the Adultfriendfinders.

25 **A No.**

1 Q Okay. When did your  
 2 subscription stop?  
 3 A Prior to our marriage.  
 4 Q Okay. Was that while you all  
 5 were dating?  
 6 A No.  
 7 Q Okay. When did it stop, sir?  
 8 A I can give you a guesstimated  
 9 date. I probably stopped that, I'd say,  
 10 almost a year before I ever met Anna.  
 11 Q Okay.  
 12 A I saw what it was, I didn't like  
 13 it, I stopped.  
 14 Q How long were you on there for?  
 15 A Maybe a month. Maybe two months  
 16 at most. And that's a guesstimate. It  
 17 wasn't very long, I know that.  
 18 Q Your testimony today is that you  
 19 have not been on it again since the time  
 20 that you say that you were not on it any  
 21 longer?  
 22 A I think that's pretty much what  
 23 I said.  
 24 Q Where are you currently  
 25 employed?

1 A [Redacted]  
 2 Q Okay. And how long have you  
 3 been employed at [Redacted]?  
 4 A 21 years.  
 5 Q Are you salaried or hourly?  
 6 A Hourly.  
 7 Q Okay. How much are you making  
 8 per hour?  
 9 A \$44 an hour.  
 10 Q Do you get overtime?  
 11 A Occasional, but it's rare.  
 12 Q What did you clear in 2024?  
 13 What was your reported income to the  
 14 Internal Revenue Service?  
 15 A Can I look at my notes or my  
 16 paperwork to give you an accurate  
 17 answer?  
 18 Q I don't mind for you to look at  
 19 it.  
 20 A (Witness examines documents.)  
 21 THE WITNESS: Do you have  
 22 those, Doug? Because I thought I  
 23 had them in there, and I don't.  
 24 MR. BATES: If you don't have  
 25 them, you don't have them.

1 MS. DUKE: I haven't gotten  
 2 the 2024 stuff yet, I don't think.  
 3 So if you've got it, I'll --  
 4 MR. BATES: The taxes?  
 5 MS. DUKE: Yeah.  
 6 MR. BATES: I thought you were  
 7 talking about the paystub. The  
 8 only paystub I have -- well, I've  
 9 got --  
 10 MS. DUKE: The taxes is what I  
 11 was needing.  
 12 MR. BATES: Oh, the tax  
 13 returns?  
 14 MS. DUKE: The tax amount,  
 15 yeah.  
 16 MR. BATES: That was the 2023  
 17 taxes. I don't think I've got his  
 18 2024 tax return.  
 19 BY MS. DUKE:  
 20 Q Sir, do you have that with you?  
 21 A I thought I did, but I can't  
 22 find it.  
 23 Q Okay.  
 24 A I don't want to misspeak.  
 25 Q Well, go ahead and give me an

1 estimate, and then if you've got to  
 2 correct it on the record after, we'll do  
 3 that. Okay?  
 4 A It's probably somewhere in the  
 5 neighborhood of (Indiscernible).  
 6 COURT REPORTER: I'm sorry,  
 7 did you say 80 or 85?  
 8 THE WITNESS: 85.  
 9 COURT REPORTER: Thank you.  
 10 BY MS. DUKE:  
 11 Q During any part of 2024, were  
 12 you on disability?  
 13 A Of 2024?  
 14 Q Uh-huh. (Affirmative). Or did  
 15 you --  
 16 A Just the very -- just the very  
 17 first part. I went back to work in  
 18 January of 2024, so it was very early in  
 19 '24.  
 20 Q How much do you currently have  
 21 in your retirement with them?  
 22 A In my...  
 23 Q I understand you've got a  
 24 pension, you've got a retirement, and  
 25 you've got a Roth. So tell me what's in

1 each one of those.

2 **A I'm not 100 percent sure what's**  
3 **in my Roth. My Vanguard, which is my**  
4 **401, should be close to 100,000. And**  
5 **then I had my pension through my work.**  
6 **And the truth is, is every time I've**  
7 **asked the lady that's in charge of that,**  
8 **she never gives me an accurate answer.**  
9 **It works off of an amortization**  
10 **schedule.**

11 **So I think the way it works is**  
12 **you have to have an actual retirement**  
13 **date, and then they can get you really**  
14 **close. But it never seems to be**  
15 **accurate. So I can't honestly answer**  
16 **that question.**

17 **Q Okay. So sitting here today you**  
18 **don't know that, and you don't know --**  
19 **do you know how much you're contributing**  
20 **to your Roth every month?**

21 **A To my Roth? It's not -- it's**  
22 **not a lot.**

23 **Q Well, you agree with me that**  
24 **your gross pay is upwards of \$7,000, but**  
25 **your net pay at the month's end, based**

1 **my -- they handle the Roth, and the**  
2 **401K.**

3 **Q And how much are you putting in**  
4 **there each month?**

5 **A Man, I wish I could tell you --**  
6 **give you a correct answer, because I**  
7 **don't know. They don't -- we don't have**  
8 **paystubs. We have direct deposit. So I**  
9 **don't really look at my paystubs all**  
10 **that often.**

11 **Q Have you increased that amount**  
12 **since you separated from your wife?**

13 **A No, ma'am. I've left everything**  
14 **the same.**

15 **Q Okay. So you're bringing home**  
16 **\$4,000 a month, but you're still living**  
17 **in a camper?**

18 **A It's the cheapest way for me to**  
19 **live.**

20 **Q Okay. But it's not because you**  
21 **can't afford a place to live, right?**

22 **A I mean, I could -- I could**  
23 **probably go get an apartment. I can't**  
24 **go buy the home that I had prior to this**  
25 **marriage. But I could go -- I could**

1 on what you provided, was around 4,000.

2 **A Net. My net -- my net is -- I'm**  
3 **bringing home about 4,000.**

4 **Q Okay. So that means that you're**  
5 **putting a significant amount somewhere.**  
6 **Aside from your insurance, you're**  
7 **putting some money somewhere.**

8 **A Yes. Definitely. You know, I**  
9 **get, I think, it's like 50 a week out of**  
10 **my -- out of my pay that goes into the**  
11 **pension. And then I have insurance, and**  
12 **then I have --**

13 **Q How much is your insurance per**  
14 **month?**

15 **A It's like -- I'm paying**  
16 **100-and-like-30, 35 a week out of my**  
17 **check. So 130 times four.**

18 **Q Are you the only one on that**  
19 **insurance?**

20 **A Yes.**

21 **Q Okay. And what else?**

22 **A That's coming out of my check?**

23 **Q Uh-huh. (Affirmative).**

24 **A I pay the insurance. I pay my**  
25 **insurance. I pay the Vanguard, which is**

1 **probably go get an apartment.**

2 **But then you're stuck -- most**  
3 **places will not let you lease an**  
4 **apartment for less than six months.**  
5 **Then most of them want a year lease.**  
6 **And with this divorce hanging in the --**  
7 **in the air, I don't see that being**  
8 **helpful.**

9 **Q Okay. You invested all your**  
10 **money from the house you sold into your**  
11 **Charles Schwab account; is that correct?**

12 **A Yes. Under -- under Anna's**  
13 **direction, that's what I did.**

14 **Q Okay. And have you checked that**  
15 **account recently to see what's in it?**

16 **A Yes.**

17 **Q How much is in it?**

18 **A 170.**

19 **Q Okay. Have you pulled money out**  
20 **of that account?**

21 **A I've had to.**

22 **Q How much have you pulled out?**

23 **A From 250, I'm down to 170. And**  
24 **that includes buying the camper, the**  
25 **truck, paying for attorneys.**

1 Q Did you ask permission from --  
 2 You did that after the divorce was  
 3 filed; is that correct?  
 4 A Yes. When I left the marital  
 5 home, I had to have a way to survive.  
 6 Q Did you ask permission from  
 7 anyone to do that?  
 8 A No. I wasn't aware that I  
 9 needed to.  
 10 Q Okay. So you've withdrawn  
 11 \$80,000, and you attribute that to the  
 12 \$45,000 camper? What else have you  
 13 spent it on?  
 14 A Camper, truck.  
 15 Q Well, the camper and truck were  
 16 45, right?  
 17 A Right. And then attorney fees.  
 18 Q Okay. How much have you spent  
 19 on attorney's fees?  
 20 A Upwards of 20 grand.  
 21 Q Okay. So on your first  
 22 attorney, how much did you spend on that  
 23 person?  
 24 A 5,000.  
 25 Q Okay. Was that Mr. Holley?

1 A Yes.  
 2 Q Okay. And how much did you  
 3 spend on your next attorney?  
 4 A 5,000.  
 5 Q Okay. And who was that?  
 6 A That would be Adam Zanetis.  
 7 Q And how much did you spend on  
 8 your next attorney?  
 9 A Jill Hudson, 5,000.  
 10 Q How much did you spend on the  
 11 next lawyer?  
 12 A This would be Doug Bates,  
 13 \$8,500.  
 14 Q And sitting here today, did any  
 15 of your retainers get returned?  
 16 A Partial.  
 17 Q Okay. Tell me how much you got  
 18 back from Mr. Holley?  
 19 A Wasn't very much. Maybe 2,000.  
 20 Q Okay. How much did you get back  
 21 from Adam Zanetis?  
 22 A About 2,500.  
 23 Q How much did you get back from  
 24 Jill Hudson?  
 25 A About 2,500. And each time that

1 they were giving that back, I was  
 2 putting it towards the next attorney.  
 3 Q So based on my rough  
 4 calculations, the total amount of fees  
 5 you've spent on lawyers is 16,000. Is  
 6 that accurate?  
 7 A It's pretty close. I don't know  
 8 if you'd call it accurate because I  
 9 don't have accurate numbers to give you.  
 10 Q And tell me, sir, what else have  
 11 you spent your \$80,000 on? Because  
 12 16,000 plus 45 is 61,000. So where did  
 13 the other 19,000 go?  
 14 A 6,000 of it went towards an  
 15 enclosed trailer, so I'd have a way to  
 16 store some of my personal property.  
 17 Q Okay. Have you disclosed that  
 18 in your discovery, that trailer?  
 19 A I believe I have.  
 20 Q Okay. Did you pay for that in  
 21 cash?  
 22 A Yes.  
 23 Q Okay. And where is that  
 24 enclosed trailer right now?  
 25 A With me at the property where

1 I'm at.  
 2 Q So if you --  
 3 A Is there any need for that?  
 4 Q -- failed to disclose the  
 5 enclosed trailer -- When did you obtain  
 6 the enclosed trailer? You can't look to  
 7 him for answers.  
 8 When did you get that trailer?  
 9 You can't look at him for answers, sir.  
 10 When did you get the enclosed  
 11 trailer?  
 12 A I'm sorry, you made me lose my  
 13 train of thought.  
 14 Q When did you get the enclosed --  
 15 THE WITNESS: Could you please  
 16 ask counsel to stop?  
 17 COURT REPORTER: I'm not --  
 18 MS. DUKE: That's not her job,  
 19 sir.  
 20 MR. BATES: Just answer the  
 21 questions, okay?  
 22 THE WITNESS: I'm trying to  
 23 answer the question. She --  
 24 BY MS. DUKE:  
 25 Q When did you get --

1           **THE WITNESS:** I need -- if I  
2 look -- if I look -- If I turn and  
3 look --

4           **MR. BATES:** You look wherever  
5 you want.

6           **THE WITNESS:** But she's got a  
7 problem with me turning my head?

8           **MR. BATES:** I'm not going to  
9 --

10          **THE WITNESS:** I didn't ask for  
11 an answer.

12          **MR. BATES:** I'm not going to  
13 give you the answer.

14          **THE WITNESS:** I just turned my  
15 head.

16          **MR. BATES:** Okay.

17 **BY MS. DUKE:**

18          **Q** When did you get the enclosed  
19 trailer?

20          **A** **When did I get that? What month**  
21 **was that? I think it was in June or**  
22 **July of last year. That's a**  
23 **guesstimate.**

24          **Q** Is it titled? Is it titled? Do  
25 you have to get a tag for it?

1           **A** **In this -- in the State of**  
2 **Tennessee, you really don't have to have**  
3 **a tag for a trailer. I don't have a**  
4 **tag. I've got a bill of sale.**

5           **Q** Okay. And who did you purchase  
6 that trailer from?

7           **A** **A couple from Andrews, North**  
8 **Carolina.**

9           **Q** Did you meet them there to get  
10 it?

11          **A** **Yes, I did.**

12          **Q** Okay. So that leaves -- that  
13 leaves about 13,000 more dollars.  
14 Where's the rest of it?

15          **A** **Probably used as supplements,**  
16 **you know, to help me get things that I**  
17 **needed for around the home, around my**  
18 **camper. You know, there's -- I stayed**  
19 **through the camper -- in the camper**  
20 **through the winter months. So, you**  
21 **know, I had to help winterize the**  
22 **camper.**

23          **Q** Okay. How much does it cost to  
24 winterize that camper?

25          **A** **It depends on where you shop.**

1           **Q** Okay. How much did it cost you,  
2 sir?

3           **A** **Well, I mean, I can't -- I can't**  
4 **sit here and break it down piece by**  
5 **piece for you, but I'm sure it adds up**  
6 **quite a bit.**

7           **Q** Okay. How much, sir?

8           **A** **That it costs to winterize the**  
9 **camper?**

10          **Q** I mean, was it \$13,000?

11          **A** **I don't think it was that much.**

12          **Q** How much was it?

13          **A** **I'd say somewhere in the**  
14 **neighborhood of 500 or \$600.**

15          **Q** Where's the rest of the 12,000  
16 that's left?

17          **A** **Probably somewhere between, you**  
18 **know, getting new attorneys.**

19          **Q** Okay. Well, we've gone through  
20 the attorneys, and we agreed that that  
21 cost about \$16,000. Have you met with  
22 other attorneys and paid consultation  
23 fees maybe?

24          **A** **I have.**

25          **Q** How many consultation fees have

1 you -- You don't have to tell me who you  
2 met with, but how many consultation fees  
3 have you paid?

4           **A** **I paid at least three or four.**

5           **Q** Okay. So that'd be 4- or \$500,  
6 right?

7           **A** **Yeah.**

8           **Q** Okay. So where's the other  
9 \$11,000 that you spent?

10          **A** **The only thing -- the only**  
11 **answer I have for you is it was to, you**  
12 **know, maintain my life. You know, to**  
13 **buy things that I needed, you know, for**  
14 **the camper or for me. Or maybe I'm**  
15 **running a little low on money this week,**  
16 **and I needed some.**

17          **Q** Okay. Have you purchased  
18 anything for anyone else?

19          **A** **No.**

20          **Q** Okay. When you pulled this  
21 money out, did you reflect it on your  
22 income tax return as income?

23          **A** **You know, I don't know if I did**  
24 **or not, honest truth.**

25          **Q** So the \$80,000, you can agree

1 with me, was pulled out in 2024, right?  
 2 The majority of it?  
 3 **A Yes.**  
 4 **Q** Okay. So sitting here today,  
 5 you don't know if you disclosed to the  
 6 Internal Revenue Service that you pulled  
 7 out \$80,000?  
 8 **A I wasn't aware that I needed to,**  
 9 **but okay.**  
 10 **Q** Did you pay taxes on that  
 11 \$80,000?  
 12 **MR. BATES:** Object to form.  
 13 That's not how capital gains works.  
 14 **BY MS. DUKE:**  
 15 **Q** Did you pay taxes on that  
 16 \$80,000?  
 17 **MR. BATES:** Object to form.  
 18 **MS. DUKE:** You can object to  
 19 form. He can still say yes or no.  
 20 **A Yes or no.**  
 21 **BY MS. DUKE:**  
 22 **Q** Did you pay any taxes on the  
 23 money that you pulled out of retirement?  
 24 **A Okay. When you say pulled out**  
 25 **of retirement, which account are you**

1 **referring to?**  
 2 **Q** Okay. Wherever you pulled the  
 3 \$80,000 out.  
 4 **A That -- that was out of my**  
 5 **Schwab account, which is a savings**  
 6 **account.**  
 7 **Q** It's a money market account,  
 8 isn't it, sir?  
 9 **A No, it's a savings account.**  
 10 **Q** Is it gaining any interest?  
 11 **A I don't think it's gaining much.**  
 12 **I mean, I did what my wife told me to**  
 13 **do. She told me to use Charles Schwab.**  
 14 **That's what I did, following her sound**  
 15 **financial advice.**  
 16 **Q** Okay. And you agree she's got  
 17 sound financial advice; is that correct?  
 18 **A Anna is absolutely the smartest**  
 19 **woman I've ever met when it comes to**  
 20 **finances.**  
 21 **Q** Okay. And if she says it's a  
 22 money market, do you not trust her in  
 23 saying that it's a money market?  
 24 **A Okay.**  
 25 **Q** Yes or no?

1 **A You're speaking -- you're**  
 2 **speaking in a different language,**  
 3 **because I don't understand these banking**  
 4 **and the terminologies and stuff that,**  
 5 **you know, Anna is very familiar and**  
 6 **acquainted with.**  
 7 **Q** Okay. So you don't know -- So  
 8 you answered a question that you don't  
 9 know the answer to then; is that  
 10 correct?  
 11 **A This is getting confusing.**  
 12 **Q** Sir, why is it confusing? It's  
 13 your money, right?  
 14 **A Yes. All -- all that I was**  
 15 **aware of is that the money that I put**  
 16 **into Charles Schwab was just a savings**  
 17 **account. That's all I've ever really**  
 18 **knew about that. Anna was helping me,**  
 19 **you know, put the money where she felt**  
 20 **it should go, and I was following her**  
 21 **instructions.**  
 22 **Q** How old are you, sir?  
 23 **A Well, I'll be 55 in December.**  
 24 **Q** Okay. Have you ever managed  
 25 your own finances?

1 **A Of course I have.**  
 2 **Q** Okay.  
 3 **A But I've never dealt in money**  
 4 **markets or dealt with, you know,**  
 5 **anything higher than just my local bank**  
 6 **until Anna. I never had investments. I**  
 7 **never did any, you know, money**  
 8 **transferring or --**  
 9 **Q** So when she --  
 10 **A -- brokerages.**  
 11 **Q** -- suggested you put your money  
 12 in a money market or you put it at  
 13 Charles Schwab, that was sound financial  
 14 advice. Is that fair?  
 15 **A I would -- I was trusting my**  
 16 **wife.**  
 17 **Q** Okay. Have you pulled money out  
 18 of any of your other accounts?  
 19 **A The only other account I have,**  
 20 **you know, that I use -- use any money**  
 21 **for is my Ascend Federal Credit Union**  
 22 **account, which I've been with them since**  
 23 **I started at the base 21 years ago.**  
 24 **Q** So your testimony is you've not  
 25 pulled out anything from your Roth IRA?

1       **A**   **No.**  
 2       **Q**    You've not pulled out anything  
 3    from your 401K?  
 4       **A**   **No. I have not touched any.**  
 5    **And Anna is still my primary beneficiary**  
 6    **on all my stuff.**  
 7       **Q**    You agree that in your responses  
 8    to your discovery, that you disclosed  
 9    that the Charles Schwab One Account was  
 10   an investment account; is that correct?  
 11       **A**   **Did I?**  
 12       **Q**    Yes, sir. Do you want me to  
 13   show it to you?  
 14       **A**   **Yes, would you? (Witness**  
 15   **examines document.)**  
 16       **Q**    So the day you filled that out,  
 17   you knew it was an investment account.  
 18   But today you don't know that?  
 19           **MR. BATES:** Object to form.  
 20   **BY MS. DUKE:**  
 21       **Q**    Yes or no, sir?  
 22       **A**   **I'm reading. Okay. So, I'm**  
 23   **trying to answer your question.**  
 24       **Q**    You agree with me that you set  
 25   the Ascend Federal Credit Union account

1    out as a savings account, and that --  
 2       **A**   **It's my savings and my checking.**  
 3       **Q**    Okay. And your Charles Schwab  
 4    One Account as your investment account;  
 5    is that correct?  
 6       **A**   **Well, it's just -- all it's used**  
 7   **for is savings. I mean, I just put my**  
 8   **money there.**  
 9       **Q**    Is there a reason you didn't put  
 10   the word "savings" on there and you put  
 11   "investment account"?  
 12       **A**   **I mean, that could have been a**  
 13   **blunder on my part. And if I did, it**  
 14   **was just a mistake. Again, I'm not real**  
 15   **versed in finances.**  
 16       **Q**    Now, you answered this discovery  
 17   back on September the 30th, 2024, and  
 18   you answered it and disclosed that you  
 19   were making \$32 per hour at that time.  
 20           Has your hourly rate increased  
 21   by \$12 since September of 2024?  
 22       **A**   **That's -- that sounds about**  
 23   **right.**  
 24       **Q**    Sir, you received disability  
 25   from Standard Insurance; is that

1    correct?  
 2       **A**   **Yes, I did.**  
 3       **Q**    And you received that from  
 4    December the 6th, 2022 through March of  
 5    2024; is that correct?  
 6       **A**   **No, I didn't receive -- I**  
 7   **went -- When I went back to work, the**  
 8   **disability stopped. I went back to work**  
 9   **the first of -- first of January.**  
 10       **Q**    Okay. Well, I'm reading from  
 11   your discovery.  
 12       **A**   **Okay. I mean, did I make a**  
 13   **blunder there? Did I make a mistake?**  
 14       **Q**    Well, you say that your first  
 15   payment was December the 6th of 2022.  
 16   Was it actually in June of 2022?  
 17       **A**   **That would be more -- yeah, that**  
 18   **would be more correct. It was the --**  
 19   **see, they started out with short-term,**  
 20   **and then they -- as it carries on, then**  
 21   **they divvy it over to long-term.**  
 22       **Q**    So did you receive a check in  
 23   March of 2024 from disability?  
 24       **A**   **Of 2024?**  
 25       **Q**    Yes, sir.

1       **A**   **If I did, it was -- I remember**  
 2   **there were two checks that I had to**  
 3   **return because I'd already went back to**  
 4   **work.**  
 5       **Q**    Okay. Did you fail to disclose  
 6   to Standard Insurance that you went back  
 7   to work?  
 8       **A**   **No.**  
 9       **Q**    Okay. Then why were they still  
 10   sending you checks?  
 11       **A**   **I would say a miscalculation on**  
 12   **their part. But they -- again, I sent**  
 13   **the money back.**  
 14       **Q**    Okay. Did they have to demand  
 15   that you return the money?  
 16       **A**   **No.**  
 17       **Q**    And when did you send the  
 18   payments back?  
 19       **A**   **When they sent me the payment, I**  
 20   **sent the payment back.**  
 21       **Q**    And that's your testimony under  
 22   oath?  
 23       **A**   **That's my testimony under oath.**  
 24       **Q**    Now, your date of marriage was  
 25   September the 3rd, 2022; is that

1 correct?

2 **A That's correct.**

3 **Q** And when you got married, you  
4 were receiving disability benefits  
5 already; is that correct?

6 **A That is correct.**

7 **Q** Okay. And in your discovery,  
8 you disclose that you did work on the  
9 residence where you were living; is that  
10 correct?

11 **A Yes, I did.**

12 **Q** What kind of work do you say  
13 that you did on the residence?

14 **A Everything.**

15 **Q** Okay. Well, tell me what  
16 everything encompasses.

17 **A Well, repairing a home that was  
18 in disarray, repairing a property that  
19 was in disarray.**

20 **Q** Okay. So what did you do to  
21 repair it?

22 **A And, please understand, a lot of  
23 this work was started prior to the  
24 marriage. When I sold my home in  
25 December of '21, I was working on the**

1 **home even at that time.**

2 **Q** Okay. I'm asking you what you  
3 did from September 2022 forward.

4 **A Let's see, I helped feed  
5 animals, help take care of animals. I  
6 put up fencing for animals. I helped  
7 install a full home generator. I helped  
8 replace a breaker panel, a whole house  
9 breaker panel, upgrading it from an  
10 antiquated system to a newer system.**

11 **Let's see, I -- well, basically  
12 got a bathroom going that was dead. And  
13 went out and bought a new commode at  
14 Home Depot and installed it. And I had  
15 to replace an upstairs commode and  
16 installed it. I replaced a dishwasher,  
17 a garbage disposal, a sink, an oven  
18 insert or a -- what do you call that?  
19 The eyes of the oven. I did that, along  
20 with --**

21 **Q** How about a stove? Do you mean  
22 the stove?

23 **A Stove -- it was a stove top,  
24 induction stove top. Anna sat on it and  
25 cracked it. So she bought another one,**

1 **and then I installed it.**

2 **Q** Okay. And this is all while you  
3 were on disability?

4 **A I wouldn't say all, but a lot of  
5 it, yeah.**

6 **Q** Okay. What of these things you  
7 just listed were you not on disability  
8 for?

9 **MR. BATES:** Object to form.

10 **BY MS. DUKE:**

11 **Q** You still have to answer, sir.

12 **A I'm just trying to figure out  
13 the question.**

14 **Q** What did you do, of the things  
15 you've just listed, after September of  
16 2022 when the two of you were married?

17 **A Okay, the things that I did.**

18 **Q** That -- that was my question to  
19 begin with. You list all these things,  
20 and now you're backtracking. Tell me  
21 what you did after September of 2022.

22 **A Can you take a deep breath? Can  
23 you calm down?**

24 **MR. BATES:** You just answer  
25 the questions.

1 **BY MS. DUKE:**

2 **Q** Tell me what you did after  
3 September of 2022.

4 **A Well, after September 22.**

5 **Q** Did you install the full home  
6 generator after September of 2022?

7 **A I assisted in the installation,  
8 yes.**

9 **Q** Who did you assist?

10 **A I don't remember the  
11 electrician's name. It had to be by an  
12 electrician, because they had to cut  
13 into the hard line coming into the house  
14 from the power company.**

15 **Q** So you hired an electrician, or  
16 Ms. Kennedy hired an electrician; is  
17 that correct?

18 **A Yep.**

19 **Q** Okay. So the breaker panel, did  
20 you install that?

21 **A I helped install it.**

22 **Q** Okay. The electrician that was  
23 hired did most of it?

24 **A He did a lot of it.**

25 **Q** Okay. And that was after

1 September of 2022, correct?  
 2 **A Yes.**  
 3 **Q** Okay. The fencing for the  
 4 animals, was that after September of  
 5 2022?  
 6 **A That would be prior.**  
 7 **Q** Okay. The bathroom commodes  
 8 times two, was that before or after  
 9 September '22?  
 10 **A That's -- one was before and one**  
 11 **was after.**  
 12 **Q** Did you carry those commodes up  
 13 the stairs?  
 14 **A With help, yes.**  
 15 **Q** Okay. Who helped you?  
 16 **A Anna.**  
 17 **Q** Okay. The dishwasher. You  
 18 replaced it?  
 19 **A That was prior to September '22.**  
 20 **Q** Okay. The sink?  
 21 **A Prior to September '22.**  
 22 **Q** The eyes on the stove top?  
 23 **A After September '22.**  
 24 **Q** Okay. When you were doing these  
 25 home improvements, is there anything

1 working at the home doing labor that you  
 2 told your doctor you could not do. Is  
 3 that accurate?  
 4 **A No, it's not accurate at all.**  
 5 **That's an assumption.**  
 6 **Q** Okay. Well, tell me what you  
 7 told your doctor then.  
 8 **A Exactly what I stated. I had**  
 9 **[REDACTED] symptoms. There were good**  
 10 **days; there were bad days. There were**  
 11 **days that I felt like I could get out**  
 12 **and do something. And then there were**  
 13 **days that I couldn't. There were not**  
 14 **days that were consistent to where I**  
 15 **could -- I'd get up and work this day**  
 16 **and feel just great to go out and work**  
 17 **the next day.**  
 18 **Q** Okay. Did you report that to  
 19 your doctor when you were feeling good?  
 20 **A I -- I met with this doctor once**  
 21 **a month, and I'm still meeting with that**  
 22 **doctor once a month, even today.**  
 23 **Q** Okay. What is that doctor's  
 24 name, sir?  
 25 **A [REDACTED]**

1 else you can think of that you did?  
 2 **A Helping take care of the**  
 3 **animals, helping keep the house clean,**  
 4 **trying to keep the yard maintained,**  
 5 **cleaning up out at the barn. Doing**  
 6 **bushhogging, mowing, weedeating,**  
 7 **basically maintaining the property,**  
 8 **still doing some tree trimming. You**  
 9 **know, trying to get the place cleaned**  
 10 **up.**  
 11 **Q** And this was all after September  
 12 of 2022?  
 13 **A I would say a lot of it, yes.**  
 14 **Q** Okay. Did you disclose that to  
 15 your disability carrier?  
 16 **A They didn't ask.**  
 17 **Q** Okay. But, sir, you told your  
 18 disability carrier that you were  
 19 disabled and could not work; is that  
 20 correct?  
 21 **A I was seen under my -- I was**  
 22 **under my doctor's care.**  
 23 **Q** Okay.  
 24 **A My primary care physician.**  
 25 **Q** I understand that. But you're

1 **Q** Say that last name again.  
 2 **A [REDACTED]**  
 3 **Q** Do you have any problem with  
 4 signing a medical release so that we can  
 5 get copies of your medical records?  
 6 **A I don't have a problem with that**  
 7 **at all.**  
 8 **MR. BATES:** We'd just request  
 9 a protective order.  
 10 **MS. DUKE:** Oh, I don't have  
 11 any -- I'm not going to disseminate  
 12 it. Obviously, my client's  
 13 entitled to see it, but...  
 14 **MR. BATES:** I agree.  
 15 **BY MS. DUKE:**  
 16 **Q** Sir, are you on any medications  
 17 today?  
 18 **A Yeah, my standard medications.**  
 19 **Q** Okay. Tell me about those.  
 20 **A [REDACTED]**  
 21 **[REDACTED] It doesn't come in any**  
 22 **generic form. You have to pay the full**  
 23 **price for that one.**  
 24 **Q** How much is that?  
 25 **A For me, a 30-day supply is \$50 a**

1 month.

2 Q Okay. And what is that for?

3 A ~~Anxiety, depression.~~

4 Q What is the milligram on that?

5 A 20.

6 Q ~~And Dr. Woodley~~ is that the one  
7 that's prescribing that?

8 A He's maintaining it. The  
9 original prescription came from ~~Dr.~~  
10 ~~Dwight King, psychiatrist.~~ I was seeing  
11 him prior to me exiting the home.

12 Q Okay. What else are you taking?

13 A ~~Vitamins, medicine for blood~~  
14 ~~pressure.~~

15 Q What's the medicine for blood  
16 pressure you're taking?

17 A ~~It was Propranolol.~~

18 Q ~~Propinol?~~ [sic]

19 A Yeah, I think it was  
20 ~~Propranolol, Propranolol. I'm trying~~  
21 ~~to say it right.~~

22 Q What else?

23 A ~~Well, he's had -- because it's~~  
24 ~~fluctuating, there's been several~~  
25 ~~different ones that he's had me on. But~~

1 ~~that's the main one that I take. He's~~  
2 ~~had to adjust medications to try to get~~  
3 ~~it, you know, under control.~~

4 Q Okay. So you're taking other  
5 ~~blood pressure medications?~~

6 A I had been, but that's the main  
7 one I've been taking.

8 Q Okay.

9 A They're switching me around  
10 because he just -- you know, this one's  
11 adjusting too much, this one's not  
12 adjusting it enough.

13 Q And the last 48 hours, is  
14 ~~open~~ -- whatever it is --

15 A Yeah.

16 Q -- the only one you've taken?

17 A Yes.

18 Q Okay. What else do you take?

19 A ~~Other than vitamins, I do take~~  
20 ~~maintenance medication, and have for~~  
21 ~~years, for the IBS. I don't remember~~  
22 ~~the name of it, though.~~

23 Q Anything else?

24 A ~~I am prescribed -- oh, what is~~  
25 ~~it? Alprazolam, I get -- I have that~~

1 one.

2 Q What is that for?

3 A ~~Anxiety and depression.~~ And  
4 it's only as needed.

5 Q Anything else?

6 A Other than vitamins, no, ma'am.

7 Q Okay. ~~The Alprazolam is that~~  
8 ~~the Xanax you're taking?~~

9 A ~~I don't take Xanax.~~

10 Q Have you taken ~~Xanax~~ in the  
11 past?

12 A ~~Of course I have.~~

13 Q Okay. When was the last time  
14 you took ~~Xanax~~?

15 A Better than -- I'd say right at  
16 ~~year since I've had a Xanax.~~

17 Q Is there any reason why you  
18 ~~stopped taking Xanax?~~

19 A Yes. Because Anna had pointed  
20 out to me that long-term use of ~~Xanax~~  
21 can create other issues. I felt that  
22 she was right, so I found something  
23 else.

24 Q And what replaced that, which  
25 one of these replaced that?

1 A ~~Alprazolam.~~ I think that's the  
2 name of it. If it's not, it's one  
3 similar.

4 Q Okay. Sir, tell me about your  
5 family. Other than Ms. Anna Kennedy,  
6 tell me what family you've got.

7 A Well, I have my oldest son,  
8 ~~Christopher.~~ I have my daughter, ~~Megan.~~  
9 ~~and I have my youngest son, Tyler.~~ And  
10 then I have a granddaughter with my  
11 oldest son. I have a sibling named  
12 ~~Mark.~~ I have a sibling named ~~Maureen.~~  
13 And that's pretty much what I call my  
14 family, other than friends.

15 Q Okay. Do you maintain contact  
16 with ~~Christopher~~?

17 A Yes.

18 Q Do you maintain contact with  
19 ~~Megan~~?

20 A No.

21 Q Why is that?

22 A Based off her wishes, I leave  
23 her alone.

24 Q Okay. So she's asked for you  
25 not to have contact with her?

1       **A**    Well, she's not came right out  
2   and stated that, but, I mean, I've  
3   reached out to her several times and she  
4   doesn't respond back, so...

5       **Q**    Okay. Why is that, sir?

6       **A**    Long story short, she came to my  
7   home, was very disrespectful. I told  
8   her that if you're going to do that to  
9   me in my own home, that's not going to  
10  work. I said, you know, I'm not going  
11  to be treated that way.

12      **Q**    How did she treat you that you  
13  say was disrespectful?

14      **A**    Just her overall attitude  
15  towards me.

16      **Q**    How was her attitude?

17      **A**    Very accusatory.

18      **Q**    What did she accuse you of?

19      **A**    Basically not being a good  
20  father.

21      **Q**    What did she say?

22      **A**    That I wasn't there for her when  
23  she was younger.

24      **Q**    Did she accuse you of physically  
25  abusing her?

1       **A**    No.

2       **Q**    She's never said that?

3       **A**    Three -- I gave my daughter  
4   three licks with a belt, only on her  
5   behind.

6       **Q**    Okay. Let me stop you there,  
7   just real quick. You say she's never  
8   accused you of physically abusing, but  
9   then you launch into what she has said.  
10  So has she accused you of it or not?

11      **A**    Okay. If you're putting it in  
12  that regard, I guess that would be a  
13  yes.

14      **Q**    Okay. But your testimony today  
15  is you only ever gave her three licks?

16      **A**    Yes.

17      **Q**    Okay. And so when you said  
18  she came to your house and was  
19  disrespectful, she was pointing out that  
20  you had -- or she, in her own words, not  
21  that you have to agree that this is what  
22  happened, but in her words had  
23  physically abused her.

24            And that was enough for you to  
25  say you're being disrespectful, leave my

1       home. Is that how it went?

2       **A**    No.

3       **Q**    Okay. So tell me how it went.

4       **A**    She came -- she came in. She  
5   just had a -- she just was angry. I  
6   don't --

7       **Q**    When was this, let me ask you  
8   that?

9       **A**    Well, it's been about three or  
10  four years ago.

11      **Q**    Was it when you were married to  
12  Ms. Kennedy?

13      **A**    No.

14      **Q**    Okay.

15      **A**    And she just came into the home.  
16  She was already upset and aggravated.  
17  And I -- honestly, I don't know what  
18  about. But she was very disrespectful  
19  towards me and the way she was acting  
20  and treating me. And I told my daughter  
21  that if you're not going to treat me --

22            **THE WITNESS:** Oh, wow, look at  
23  this.

24      **BY MS. DUKE:**

25      **Q**    You can keep answering if I do

1       that. I'm just clarifying something  
2   with my client.

3            So she's upset and aggravated,  
4   but your testimony is you don't know  
5   what it was about? Is that correct?

6       **A**    She was upset, aggravated. I  
7   can't recall the full conversation. I  
8   just told my daughter that if you're not  
9   going to treat me as your father with a  
10  little bit of respect in my own home,  
11  you know, maybe you shouldn't come  
12  around.

13      **Q**    What about your relationship  
14  with [REDACTED]?

15      **A**    Oh, that's a rough one.

16      **Q**    Can you tell me about it?

17      **A**    Well, I've pretty much raised  
18  [REDACTED], up until his teen years. And  
19  when he turned 15, he started acting out  
20  like a lot of boys will. Got a first  
21  girlfriend, and that's all he could  
22  think about. It was like a deer in the  
23  rut. He was -- he was becoming out of  
24  control. Wouldn't listen. His mother  
25  --

1 Q Who's his mother?  
 2 A **Marie Williams**  
 3 Q Okay.  
 4 A **His mother and her family are**  
 5 **pretty much alcoholics and drug addicts**  
 6 **and they noticed and told Tyler that he**  
 7 **would be better off to come live with**  
 8 **them, which he did, instead of living**  
 9 **with me. He was getting in trouble at**  
 10 **school by selling vape cigarettes at his**  
 11 **school, him and another kid. He got**  
 12 **trusted for that. So he went and lived**  
 13 **with his mother.**  
 14 Q And how did that go?  
 15 A For him, it got worse. And  
 16 he -- he started living his life, doing  
 17 whatever he wanted, didn't have any  
 18 parental control whatsoever. No  
 19 structure, no nothing. If he didn't  
 20 want to go to school, she wouldn't make  
 21 him.  
 22 Q And were you seeing him during  
 23 this time?  
 24 A On and off, when he would want  
 25 to see me.

1 Q Did he ever tell you what his  
 2 problem was with you?  
 3 A No, he didn't.  
 4 Q Okay. What's your relationship  
 5 like now with him?  
 6 A We don't have one.  
 7 Q Have you reached out to him like  
 8 you reached out to **Tyler**?  
 9 A Not since -- not since March of  
 10 '24.  
 11 Q Why is that?  
 12 A I'm giving -- giving him what he  
 13 wants, space.  
 14 Q Do you know how he's doing?  
 15 A I don't know for sure. But, you  
 16 know, he keeps in contact with Anna.  
 17 You know, Anna gave him \$1,000 for  
 18 Christmas in 2023.  
 19 Q Well, you and Anna were together  
 20 at that time, right?  
 21 A Yes. But I wasn't aware of that  
 22 fact until later.  
 23 Q Well, did you have a problem  
 24 with him getting a Christmas present  
 25 from you two?

1 A No, I wouldn't have had a  
 2 problem.  
 3 Q Is there a reason you mentioned  
 4 that Anna gave him \$1,000 at Christmas?  
 5 A Well, it's kind of curious, you  
 6 know. Anna dropped -- was supposed to  
 7 have dropped **Tyler**. She put **Tyler** on  
 8 her at Aetna Insurance, and she was  
 9 supposed to have taken him off. But  
 10 instead of taking him off, she took me  
 11 off her insurance.  
 12 And it wasn't until I was in a  
 13 session with **Mr. King** that I was made  
 14 aware of the fact that my insurance from  
 15 Anna had been canceled.  
 16 Q Did you ask Anna about that?  
 17 A I sure did.  
 18 Q What did she say to you?  
 19 A She said they made a mistake, I  
 20 -- I was supposed to have taken **Tyler**  
 21 off, not you. But then again, I deserve  
 22 to be lied to, right?  
 23 Q Sir, I don't answer questions  
 24 today.  
 25 A I didn't ask you a question

1 today.  
 2 MR. BATES: Not a time for  
 3 rhetorical comments. Just answer.  
 4 Okay?  
 5 THE WITNESS: Sure.  
 6 BY MS. DUKE:  
 7 Q So Anna said she made a mistake.  
 8 No doubt she's still got **Tyler** insured;  
 9 is that correct?  
 10 A I'm assuming. I don't know if  
 11 she does or not.  
 12 Q He's able to be insured until  
 13 he's 26. Isn't that right?  
 14 A Yep.  
 15 Q Do you know what **Tyler** is doing  
 16 for a job these days?  
 17 MR. BATES: Do you need to  
 18 take a break?  
 19 THE WITNESS: Yeah. Let's  
 20 take a break. Okay. Thank you.  
 21 MR. BATES: The question is,  
 22 do you know what **Tyler** is doing  
 23 these days? Do you want him to --  
 24 THE WITNESS: Yes, he works --  
 25 MR. BATES: -- answer that?

1       **A**   He works at Walmart, at the  
2   distribution center. I assume he's  
3   doing okay. He's still my son. If he'd  
4   reach out and he needed anything from  
5   me, I'd be there for him. I love my  
6   children. I can't help what they do. I  
7   can pray for them, though. And I do  
8   that well.

9       **MR. BATES:** Okay.

10       **MS. DUKE:** I'm okay with a  
11   break, Doug.

12       **MR. BATES:** Okay. Sounds  
13   good.

14       (A recess was taken.)

15       **BY MS. DUKE:**

16       **Q**   Tell me about your relationship  
17   with **[REDACTED]**.

18       **A**   He's a good guy. Will always  
19   love him. **[REDACTED]** is a hardcore alcoholic,  
20   and he likes to do drugs. And I found  
21   myself for years enabling those actions.  
22   And when it got to the point I could no  
23   longer stand it, I stopped enabling him,  
24   and I removed myself.

25       **Q**   How long ago was that?

1       **A**   It's been about four years ago,  
2   five.

3       **Q**   So you don't have a relationship  
4   with **[REDACTED]**?

5       **A**   I mean, we -- we do Facebook  
6   things, you know, send little stuff  
7   there, you know, every now and then.

8       **Q**   What about **[REDACTED]**? Tell me  
9   about your relationship with her.

10       **A**   You know, she's recently had  
11   some very serious health issues. And  
12   I'd say we've kind of reconciled and  
13   sort of moved on, put the past behind us  
14   and trying to move forward.

15       **Q**   So you're telling me that just  
16   recently you've reconciled with her?

17       **A**   Yes, pretty much. She was  
18   having some serious health issues.

19       **Q**   Okay. Tell me what the issues  
20   were prior to you reconciling with her?

21       **A**   She's always been very  
22   narcissistic.

23       **Q**   Anything else?

24       **A**   She -- It's one of those  
25   situations where, you know, she didn't

1       reach out to me, and I didn't reach out  
2   to her, and just kind of fell to the  
3   wayside. She was busy. I was busy.  
4   That kind of thing.

5       **Q**   Okay. Do you have a good  
6   relationship with **[REDACTED]**?

7       **A**   Yes.

8       **Q**   Okay. Tell me about that  
9   relationship.

10       **A**   Well, he works for **[REDACTED]** down in  
11   Alabama. He's got a really good job,  
12   doing really great. He's got my  
13   grandbaby.

14       **Q**   When's the last time you saw  
15   him?

16       **A**   About a month ago.

17       **Q**   Did you not see any of your  
18   children on Father's Day?

19       **A**   **[REDACTED]** was busy. And, of  
20   course, you already know about **[REDACTED]** and  
21   **[REDACTED]**. So, no, in answer to your  
22   question, I didn't get to see them on  
23   Father's Day.

24       **Q**   How many marriages have you had,  
25   sir?

1       **A**   This is number three.

2       **Q**   Okay. Did the other two end in  
3   divorce?

4       **A**   Yes.

5       **Q**   Whose fault were those?

6       **A**   I don't know that you could --  
7   The first one, I would say it was -- I'm  
8   trying to think of the word. It was a  
9   divorce of "we know this isn't going to  
10   work," so get a divorce.

11       **Q**   Do you have any children from  
12   that?

13       **A**   That's **[REDACTED]**'s mother.

14       **Q**   **[REDACTED]**'s mother?

15       **A**   Yeah.

16       **Q**   Okay. And she's your second  
17   child. Did you have your other child  
18   out of wedlock?

19       **A**   **[REDACTED]**.

20       **Q**   **[REDACTED]** was out of wedlock?

21       **A**   Yes.

22       **Q**   What happened to that  
23   relationship?

24       **A**   As far as?

25       **Q**   Why did you not marry her?

1       **A**    **She found someone else that she**  
2   **liked better than me.**  
3       **Q**    And your second divorce, who was  
4   that?  
5       **A**    **That was Valerie Norrod**  
6       **Q**    Was that Tyler's mom?  
7       **A**    **No. I was not married to**  
8   **Tyler's mom.**  
9       **Q**    And how did Valerie Norrod --  
10 Spell that for the court reporter.  
11       **A**    **V-O-L-E-R-I-E-N-O-R-R-O-D**  
12       **Q**    Okay. How did Valerie Norrod's  
13 marriage end with you?  
14       **A**    **I filed for divorce three weeks**  
15 **after the marriage.**  
16       **Q**    Okay. Why was that?  
17       **A**    **Because I found her going and**  
18 **getting loans in my name, and this was**  
19 **prior to the marriage. I found out that**  
20 **she had been in jail and was using --**  
21 **stealing, like, my coin collection and**  
22 **some checks to try and pay off her fines**  
23 **for where she had been in jail. And I**  
24 **ended that marriage as soon as I found**  
25 **that out.**

1       **Q**    Okay. Your first marriage, how  
2 long did it last?  
3       **A**    **Six years.**  
4       **Q**    And Tyler's mom you were not  
5 married to; is that correct?  
6       **A**    **That's correct.**  
7       **Q**    And that's Tyler's?  
8       **A**    **Yes.**  
9       **Q**    How did that relationship end?  
10       **A**    **She found someone else she liked**  
11 **better than me.**  
12       **Q**    Now, since your marriage to  
13 Ms. Kennedy, have you stayed any other  
14 places than the places that you listed  
15 earlier?  
16       **A**    **No.**  
17       **Q**    You've not stayed in any hotels?  
18       **A**    **Not aware of any.**  
19       **Q**    Have you not gone on any  
20 vacations where you've stayed in hotels?  
21       **A**    **Oh, actually, I take that back.**  
22 **I went down to Fort Lauderdale.**  
23       **Q**    Who did you go down there with?  
24       **A**    **Myself. I took me. I needed a**  
25 **break. I wanted some time away.**

1       **Q**    How long do you spend away?  
2       **A**    **Oh, I think it was four or five**  
3 **days.**  
4       **Q**    Since you've been separated from  
5 Ms. Kennedy, have you spent any money on  
6 anybody else? Whether it be for --  
7 other than Ms. Kennedy, whether it be  
8 for dinner out, or for -- I don't know,  
9 taking someone on a date. Have you done  
10 anything like that?  
11       **A**    **Yeah.**  
12       **Q**    Who have you taken out?  
13       **A**    **Her name was Crystal.**  
14       **Q**    What's her last name, sir?  
15       **A**    **Speegle.**  
16       **Q**    What did you do with her?  
17       **A**    **Had a couple of dates.**  
18       **Q**    How'd you meet her?  
19       **A**    **Facebook.**  
20       **Q**    Okay. Where on Facebook did you  
21 meet her?  
22       **A**    **Friends that you may know.**  
23       **Q**    When's the last time you went  
24 out with her?  
25       **A**    **Probably about two months ago.**



1       **Q**    Where'd you go?  
2       **A**    **Just a local Mexican restaurant.**  
3       **Q**    So when we were looking at your  
4 bank statements and seeing that meals  
5 were \$40 and \$50, those would have been  
6 meals that you had with Ms. Speegle?  
7       **A**    **No, I --**  
8       **Q**    Have you had meals with anybody  
9 else?  
10       **A**    **No, not that I'm aware of.**  
11       **Q**    So if you spent 40 to \$50 on a  
12 meal, it wouldn't have just been you  
13 eating; is that correct?  
14       **A**    **There's been a couple of times**  
15 **I've done that, yes.**  
16       **Q**    Okay. Where have you done that?  
17       **A**    **Done that at, oh, The Chophouse.**  
18 **Let's see, there was another couple of**  
19 **restaurants that I went to that I liked**  
20 **real well.**  
21       **Q**    But you'd agree with me, sir,  
22 that at the Mexican restaurant, if you  
23 were spending 40 or \$50, somebody else  
24 would be there with you. Is that fair?  
25       **A**    **Yeah, that'd be fair.**

- 1       **Q** Okay. And, Ms. Speegle, where  
2 is she living?  
3       **A** **Manchester, Tennessee.**  
4       **Q** Okay. And what does she do for  
5 a living?  
6       **A** **She is a home health nurse.**  
7       **Q** Does she have any children?  
8       **A** **Yes.**  
9       **Q** Did you meet her children?  
10      **A** **A few of them.**  
11      **Q** On what occasion did you meet  
12 them?  
13      **A** **They wanted to just meet up at a**  
14 **Mexican restaurant.**  
15      **Q** Did you pay for that meal?  
16      **A** **I may have.**  
17      **Q** Do you recall how much it was?  
18      **A** **May have been 60, 80 bucks.**  
19      **They -- a couple of them refused and**  
20 **paid for themselves, so...**  
21      **Q** How many children does she have?  
22      **A** **Six.**  
23      **Q** Are they all older?  
24      **A** **Yes.**  
25      **Q** Any minors?

- 1       **A** **I just didn't see it going**  
2 **anywhere.**  
3       **Q** Spell her last name.  
4       **A** **S-P-E-E-G-L-E.**  
5       **Q** G-L-E?  
6       **A** **Yeah.**  
7       **Q** And your testimony today is that  
8 you're the one that ended it?  
9       **A** **Yes, it is.**  
10      **Q** Okay. And you have not kept her  
11 phone number?  
12      **A** **No.**  
13      **Q** Do you recall her address?  
14      **A** **No.**  
15      **Q** Do you remember what street she  
16 lived on?  
17      **A** **No.**  
18      **Q** Do you remember her parents'  
19 names?  
20      **A** **Mary and Mike.**  
21      **Q** Did her children live at the  
22 home with Mary and Mike?  
23      **A** **No.**  
24      **Q** Okay. It was just her?  
25      **A** **Yes.**

- 1       **A** **No.**  
2       **Q** Okay. And did you ever go to  
3 her house?  
4       **A** **I met her parents, if that's**  
5 **what you mean.**  
6       **Q** No, that's not what I mean. Did  
7 you ever go to her house?  
8       **A** **Well, she lived with her**  
9 **parents.**  
10      **Q** So you went to her house? The  
11 answer is yes?  
12      **A** **Yes, because she lives with her**  
13 **parents.**  
14      **Q** And did you ever stay the night  
15 with her?  
16      **A** **No.**  
17      **Q** Did she ever stay the night with  
18 you?  
19      **A** **No.**  
20      **Q** Do you have a phone number for  
21 her?  
22      **A** **No.**  
23      **Q** Why not?  
24      **A** **I ended it.**  
25      **Q** Why did you end it?

- 1       **Q** Did you tell her you're going  
2 through a divorce?  
3       **A** **Yes.**  
4       **Q** Did you kiss her?  
5       **A** **Yes.**  
6       **Q** Hold hands with her?  
7       **A** **Yes.**  
8       **Q** Have any sexual contact?  
9       **A** **No.**  
10      **Q** And how long were you dating  
11 her?  
12      **A** **Not long.**  
13      **Q** How long were you dating her,  
14 sir?  
15      **A** **How about two months.**  
16      **Q** When did you meet her?  
17      **A** **Probably in December.**  
18      **Q** Of 2024?  
19      **A** **Yeah.**  
20      **Q** Did you celebrate the holidays  
21 with her?  
22      **A** **Yeah.**  
23      **Q** Okay. How did you all  
24 celebrate?  
25      **A** **I met up at her parents', had**

1 **dinner with them.**  
 2 **Q** And by your estimation, you  
 3 ended it two months ago, so that would  
 4 have been in April?  
 5 **A I'd say that's about right.**  
 6 **Q** Okay. So when I asked you a  
 7 minute ago how long you were dating her,  
 8 it would have been more like four  
 9 months; is that accurate?  
 10 **A Yeah, yeah, that would be more**  
 11 **accurate.**  
 12 **Q** Is there a reason you didn't  
 13 tell me that to begin with?  
 14 **A I really didn't put that much**  
 15 **thought in it.**  
 16 **Q** Okay. Well, you understand,  
 17 sir, that you're still married, correct?  
 18 **A Correct.**  
 19 **Q** Would you have any problem  
 20 providing me with your Facebook messages  
 21 back and forth with her?  
 22 **MR. BATES:** We're not going to  
 23 do that.  
 24 **MS. DUKE:** I mean, I can do  
 25 supplemental.

1 **MR. BATES:** But we're not  
 2 going to do it. We're going to  
 3 move to quash it.  
 4 **MS. DUKE:** Okay. We'll see  
 5 what the judge says about that.  
 6 **BY MS. DUKE:**  
 7 **Q** What would your Facebook  
 8 messages say with her?  
 9 **A Hey, how are you doing, how's**  
 10 **your day going?**  
 11 **Q** Did you ever say anything  
 12 inappropriate to her?  
 13 **A Lord, no.**  
 14 **Q** Is there any reason why you  
 15 wouldn't provide Facebook messages then?  
 16 **MR. BATES:** Because his  
 17 attorney is telling him not to.  
 18 **THE WITNESS:** Thank you, sir.  
 19 **MS. DUKE:** No, he can answer  
 20 that, Doug.  
 21 **BY MS. DUKE:**  
 22 **Q** Is there any reason why you  
 23 would be embarrassed to provide your  
 24 information about your messages?  
 25 **A I wouldn't be embarrassed about**

1 **it, but I'm taking my attorney's advice.**  
 2 **And I think I should listen to my**  
 3 **attorney, don't you?**  
 4 **Q** I don't answer questions.  
 5 **MR. BATES:** Don't ask her  
 6 questions.  
 7 **BY MS. DUKE:**  
 8 **Q** I don't answer questions today,  
 9 sir.  
 10 So what about Instagram, have  
 11 you communicated with any women over  
 12 Instagram?  
 13 **A Lord, no.**  
 14 **Q** Okay. Have you communicated  
 15 with any other women over Facebook  
 16 Messenger?  
 17 **A No. Nothing other than looking**  
 18 **for items on marketplace.**  
 19 **Q** Okay. What have you been  
 20 looking for on marketplace?  
 21 **A Items for a dog.**  
 22 **Q** You have a dog?  
 23 **A Getting a dog. Okay.**  
 24 **Q** So what have you looked for on  
 25 marketplace?

1 **A Oh, stuff that you would need**  
 2 **for a dog.**  
 3 **Q** Like what?  
 4 **A The normal stuff that you would**  
 5 **use for a dog.**  
 6 **Q** Okay. So what have you looked  
 7 for specifically? This isn't a game.  
 8 I'm just asking questions.  
 9 **A And I'm just answering**  
 10 **questions.**  
 11 **Q** What have you looked for, for  
 12 this dog, sir?  
 13 **A A ball, a crate, a bowl, let's**  
 14 **see...**  
 15 **Q** When are you getting the dog?  
 16 **A Here in a couple of weeks.**  
 17 **Q** Where are you getting the dog  
 18 from?  
 19 **A An individual.**  
 20 **Q** Okay. Who's the individual?  
 21 **A What was their name? I can find**  
 22 **it, if you really need it.**  
 23 **Q** What type of dog is it?  
 24 **A A big one.**  
 25 **Q** It's not a game, sir. What type

1 of dog is it?

2 **A Excuse me, I need a moment.**

3 **It's -- it's kind of a bull -- bulldog**  
4 **breed.**

5 **Q** How much is it?

6 **A Well, let's see, let me think**  
7 **about it a second. It's going to be**  
8 **about 1,500, I think.**

9 **Q** Sir, do you have any outstanding  
10 credit cards right now?

11 **A No, I do not.**

12 **Q** Everything's paid off?

13 **A As far as I know.**

14 **Q** Do you agree, sir, that during  
15 the marriage that Ms. Kennedy put you on  
16 her credit cards?

17 **A I am, and I didn't ask for that.**

18 **Q** And you did not put her on your  
19 credit cards, did you?

20 **A I would have, if she had asked.**

21 **Q** And you agree, sir, that you  
22 incurred some debt on the credit cards  
23 that Ms. Kennedy allowed you to use; is  
24 that correct?

25 **A And paid them off.**

1 **800, \$900, propane charges. When the**  
2 **Lee Company were coming out to help fix**  
3 **the -- the split unit system on the**  
4 **home.**

5 **Q** So you've got records of that,  
6 sir?

7 **A Some of it, yes.**

8 **Q** Okay.

9 **A Not all.**

10 **Q** And you've got records of it  
11 being on your financial side, not on the  
12 credit cards of Ms. Kennedy?

13 **A I believe I do.**

14 **Q** And your son, [REDACTED], lived with  
15 the two of you; is that correct?

16 **A That is correct.**

17 **Q** Okay. And so Ms. Kennedy helped  
18 to support [REDACTED] while he was in your  
19 home, while he was in the home that you  
20 two lived in; is that correct?

21 **A So did I. I don't know what**  
22 **support and --**

23 **Q** So my question, sir, is simply,  
24 did [REDACTED] live with you? So that's yes  
25 or no. Did [REDACTED] live with the two of

1 **Q** Okay. I'm just -- If you'll  
2 answer the question, and then if you  
3 want to add to it, you can.

4 You incurred debt on those  
5 credit cards; is that correct?

6 **A For the farm, yes, I did.**

7 **Q** And those were Ms. Kennedy's  
8 credit cards?

9 **A For Ms. Kennedy's debt.**

10 **Q** Okay.

11 **A I was -- I was contributing to**  
12 **the household.**

13 **Q** Okay. You were not contributing  
14 financially to the household, though,  
15 were you?

16 **A I absolutely was contributing to**  
17 **the household financially.**

18 **Q** Okay. So if Ms. Kennedy says  
19 that you didn't pay any of the bills,  
20 are you telling this Court today that  
21 you were paying some of the bills?

22 **A I absolutely was paying some of**  
23 **the bills.**

24 **Q** What bill did you pay?

25 **A The Combustion Services, 700,**

1 you?

2 **A Yes.**

3 **Q** Okay. And did Ms. Kennedy help  
4 support [REDACTED]? Yes or no?

5 **A I'm assuming she did.**

6 **Q** Okay. Well, I mean, did she  
7 help purchase clothing for him?

8 **A I don't know.**

9 **THE WITNESS:** Did you buy  
10 clothing for him?

11 **BY MS. DUKE:**

12 **Q** You cannot ask her questions.

13 **MR. BATES:** Remember, answers  
14 only.

15 **A I don't know. You know, I'm**  
16 **trying to answer the questions. I**  
17 **don't -- I don't --**

18 **BY MS. DUKE:**

19 **Q** Did she help him out with a  
20 vehicle? Did she help him out -- tell  
21 me what she paid for.

22 **A That I know she paid for? She**  
23 **gave him \$1,000 at Christmas.**

24 **Q** Did she get a horse for him?

25 **MR. BATES:** If you need to

1 take a break, you need to tell  
 2 Ms. Duke you need to take a break.  
 3 **THE WITNESS:** Well, you know,  
 4 I see these two guys talking. I  
 5 mean, we're not allowed to talk?  
 6 **MR. BATES:** You're under oath,  
 7 is the difference.  
 8 **THE WITNESS:** Oh, okay.  
 9 **A** Anyway, go ahead. What was  
 10 that?  
 11 **BY MS. DUKE:**  
 12 **Q** Did she get him a horse?  
 13 **A** Did she get him a horse?  
 14 **Q** Yes.  
 15 **A** No.  
 16 **Q** Okay. Did she take care of  
 17 school expenses, school supplies,  
 18 anything like that for him?  
 19 **A** Not that I'm aware.  
 20 **Q** Groceries?  
 21 **A** Not that I'm aware of.  
 22 **Q** Okay. So did he eat the  
 23 groceries in the house that she paid  
 24 for?  
 25 **A** I'm sure he ate some.

1 **Q** Did he pay rent to her?  
 2 **A** Not that I'm aware of.  
 3 **Q** Did she make sure to maintain  
 4 internet for that child?  
 5 **A** I'm sorry?  
 6 **Q** Did she make sure to maintain  
 7 internet so he could do his schooling?  
 8 **A** Well, we had internet at the  
 9 home. So whether it was for him or  
 10 anybody else, everyone has -- you know,  
 11 could have used it. She had to have  
 12 internet because she works -- does her  
 13 work from home, and she has to have an  
 14 internet connection.  
 15 **Q** But he used it for school also;  
 16 is that correct?  
 17 **A** I'm sure he used it.  
 18 **Q** Okay. Sitting here today, sir,  
 19 how many miles does the Subaru have on  
 20 it now?  
 21 **A** It has 77,000 miles on it.  
 22 **Q** Are you still driving that  
 23 vehicle?  
 24 **A** No.  
 25 **Q** Why not?

1 **A** I don't know what I'm going to  
 2 do with it.  
 3 **Q** Why do you say it that way?  
 4 **A** I don't know whether to keep it  
 5 or sell it. I don't really want to put  
 6 any more miles on it. And since this  
 7 divorce is not finalized, you know,  
 8 Ms. Kennedy may want it back. Who  
 9 knows? It might make a nice addition to  
 10 the Corvette.  
 11 **Q** During your -- Do you have some  
 12 issue with her driving a Corvette today?  
 13 Do you know anything about the Corvette?  
 14 **A** Is there a reason you're asking  
 15 me this question?  
 16 **Q** Because you just mentioned that,  
 17 sir.  
 18 **A** Well, I just brought it up. You  
 19 know, you can't help but notice a  
 20 Corvette going down the road.  
 21 I thought phones weren't  
 22 allowed. That's a distraction.  
 23 **MS. DUKE:** Doug?  
 24 **MR. BATES:** Just answer the  
 25 questions. If you'd like to

1 criticize Ms. Duke, I'll do it to  
 2 her later tonight after drinks.  
 3 **THE WITNESS:** I'll join in.  
 4 **MR. BATES:** No, you won't.  
 5 **MS. DUKE:** Yeah, I don't think  
 6 you're invited to that.  
 7 **THE WITNESS:** A fifth wheel is  
 8 always fun.  
 9 **BY MS. DUKE:**  
 10 **Q** During the marriage, sir, you  
 11 videoed Ms. Kennedy routinely; is that  
 12 correct?  
 13 **A** Did I video her routinely?  
 14 **Q** Yes, sir.  
 15 **A** I did not video her routinely.  
 16 **Q** Well, tell me what you did, sir.  
 17 **A** Well, I just made note of what  
 18 the Ring video cameras had -- had  
 19 caught. The only video that I recorded  
 20 of Ms. Kennedy was our conversation on  
 21 trying to work out some type of  
 22 reconciliation to try to fix the  
 23 marriage, because I absolutely didn't --  
 24 really don't want a divorce.  
 25 **Q** So your testimony is today

1 you've never videoed her without her  
 2 knowing it?  
 3 **A The Ring cameras video --**  
 4 **videoed her, you know, in the areas that**  
 5 **Anna was in. And the only video that I**  
 6 **did record is a video that she knew she**  
 7 **was being recorded in, when I was trying**  
 8 **to salvage this marriage.**  
 9 **Q** Okay. You installed a video  
 10 camera in the bedroom; is that correct?  
 11 **A I didn't install a video camera.**  
 12 **Q** Okay. You put a video camera in  
 13 the bedroom; is that correct?  
 14 **A Yes.**  
 15 **Q** And you hid that video camera?  
 16 **A No, it was sitting right on top**  
 17 **of a dresser.**  
 18 **Q** Why did you do that, sir?  
 19 **A That's when I was working**  
 20 **nights. And -- well, I guess --**  
 21 **Q** When were you working nights --  
 22 **A Well, hang on. I guess it was**  
 23 **more to the fact that, you know, I was**  
 24 **driving two hours one way to work, and**  
 25 **to make sure that, you know, she got up**

1 **on time. You know, I'd call her and**  
 2 **didn't want to aggravate her, you know,**  
 3 **if she was still asleep. She'd talk to**  
 4 **me on my way to work and back home from**  
 5 **work.**  
 6 **Q** Okay. So you were out on  
 7 disability from September -- June of  
 8 2022 until March of 2024 -- or you say,  
 9 January of 2024, right? Yes or no?  
 10 **A Okay. What do -- what -- what**  
 11 **is your point?**  
 12 **MR. BATES:** I've never known  
 13 what her point is. You don't have  
 14 to worry about it, though. You  
 15 just answer questions.  
 16 **THE WITNESS:** Okay.  
 17 **MR. BATES:** Okay? So "what is  
 18 your point" or "why are you asking  
 19 that" is not a response.  
 20 **THE WITNESS:** Oh.  
 21 **MR. BATES:** Okay?  
 22 **THE WITNESS:** So just say yes  
 23 or no.  
 24 **MR. BATES:** Or whatever her  
 25 question is, you answer it.

1 **THE WITNESS:** Okay.  
 2 **BY MS. DUKE:**  
 3 **Q** From September 2022 -- June of  
 4 2022 to March of 2024, according to your  
 5 discovery, you were out of work on  
 6 disability. Yes or no?  
 7 **A June of 2022 to January of 2024**  
 8 **I was out on disability.**  
 9 **Q** Okay. And so during that  
 10 timeframe, you put a camera in the  
 11 bedroom. Yes or no?  
 12 **A You mean to physically just put**  
 13 **a camera in the bedroom that was going**  
 14 **to be affixed there permanently? No, I**  
 15 **did not.**  
 16 **Q** Okay. We talked about a camera  
 17 just a minute ago that you put in the  
 18 bedroom. When did you put that in the  
 19 bedroom?  
 20 **A I don't know. I don't have an**  
 21 **answer.**  
 22 **Q** And you said the reason you did  
 23 it is because you were working nights,  
 24 and you wanted to make sure she was  
 25 getting up on time. I'm trying to

1 figure out --  
 2 **A Let's see, there was -- we had**  
 3 **the -- we had the kind of Ring cameras**  
 4 **you could pick up and set anywhere**  
 5 **around. They -- they weren't locked to**  
 6 **any specific locations.**  
 7 **Q** Okay. My point in asking you  
 8 this is, when did you work during the  
 9 marriage? Because by my calculations,  
 10 you did not work during the marriage.  
 11 **A But I -- but I did bring in**  
 12 **income.**  
 13 **Q** That's not the question. When  
 14 did you work during the marriage that  
 15 you felt you needed to leave a camera up  
 16 in the bedroom so you could call her to  
 17 tell her to get up for work, because you  
 18 were over the road? Do you see how it's  
 19 not -- the timeline's not making sense?  
 20 **A Yeah, I think I -- I'm trying to**  
 21 **catch up here.**  
 22 **Q** So do you want --  
 23 **A We don't -- we don't think**  
 24 **alike.**  
 25 **Q** -- to correct your statement,

1 sir?

2 **A That would probably be a good**

3 **idea.**

4 **Q** Okay. Correct your statement

5 and tell me the truth.

6 **A I told you the truth.**

7 **Q** Was the truth that you worked

8 overnight --

9 **A No.**

10 **Q** -- during the marriage?

11 **A No.**

12 **Q** Okay. Then why did you say

13 that?

14 **A I got the timeline mixed up.**

15 **Q** Okay.

16 **A You're wanting what -- What**

17 **specific time are you wanting to know**

18 **about a camera? Is there a specific**

19 **time that you have in mind that you need**

20 **to know about a camera?**

21 **Q** You told me that you installed

22 the camera during the marriage, and that

23 it was when you were over -- gone at

24 night, working. But the timeline does

25 not add up because you did not work

1 during the marriage. So I'm trying to

2 sort out --

3 **A I -- I was mixed up because we**

4 **were living together prior to the**

5 **marriage. In December of '21, I sold my**

6 **home. I moved in with Anna. We had the**

7 **portable Ring cameras. You could set**

8 **them anywhere.**

9 **There was a time when I had a**

10 **camera in the bedroom, when, you know --**

11 **and I was at work prior to me going out**

12 **on disability. There was a camera in**

13 **the bedroom at that time. That I -- you**

14 **know, she'd get up, and I could -- you**

15 **know, I'd know she was up and I could**

16 **call. But during -- you know, during**

17 **the marriage, was there a camera in the**

18 **bedroom?**

19 **Q** Yes. Was there a camera in the

20 bedroom during the marriage?

21 **A None that was affixed into the**

22 **bedroom. Not any -- not any that was**

23 **mounted to, affixed to anything. It was**

24 **a pick up, set down type of camera.**

25 **Q** I did not say affixed to

1 anything. I asked you if there was a

2 camera in the bedroom during the

3 marriage, and why was it there? Yes or

4 no, number one, on whether or not a

5 camera was there?

6 **A Yes.**

7 **Q** Okay. When did you put that

8 camera in the bedroom?

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

10 **Q** Was it after marriage?

11 **A It could have been.**

12 **Q** Okay. And what did it record?

13 **A I would assume us sleeping.**

14 **Q** Okay. Do you still have the

15 videos from that camera?

16 **A No.**

17 **Q** What was the purpose of the

18 camera?

19 **A Honestly, I think I just**

20 **accidentally left it there. Walking**

21 **through the house, pick up stuff,**

22 **cleaning. What was that?**

23 **Q** Do you need to take --

24 **MS. DUKE:** Can we take a break

25 for just a minute? My pen is about

1 to go down.

2 **MR. BATES:** Let's take a --

3 **THE WITNESS:** Yeah, let's take

4 a break.

5 **MR. BATES:** Let's do.

6 (A recess was taken.)

7 **BY MS. DUKE:**

8 **Q** Let's see, how many speeding

9 tickets have you received in the last

10 two years?

11 **A Two.**

12 **Q** Okay. Which counties were those

13 in?

14 **A Well, you know about the one**

15 **here.**

16 **Q** Answer the question, sir.

17 **A You're asking when was it here?**

18 **Q** What counties did you receive

19 speeding tickets in?

20 **A Okay. That would be Hickman,**

21 **and then there would be the one in East**

22 **Tennessee. I'm thinking that is -- what**

23 **is Maryville? What is that? What is**

24 **that county?**

25 **Q** If -- if you know the city,

1 that's fine.  
 2 **A Maryville.**  
 3 **Q** And you didn't receive any other  
 4 tickets, whether it be here, in Georgia?  
 5 Have you been cited for speeding in  
 6 Georgia?  
 7 **A No, ma'am.**  
 8 **Q** Have you been accused of  
 9 stalking before?  
 10 **A Have I been accused of stalking?**  
 11 **Q** Yes, sir.  
 12 **A I've been accused of it, yes.**  
 13 **Q** Okay. By whom?  
 14 **A My ex-wife.**  
 15 **Q** What's your ex-wife's name?  
 16 **A Christine Gross.**  
 17 **Q** Have you ever been accused of  
 18 stalking by a woman named Nicole?  
 19 **A No, I don't know of her ever**  
 20 **making a statement of that. I'm not**  
 21 **aware of that.**  
 22 **Q** Okay. When you left the home in  
 23 Hickman County, did you remove all of  
 24 the remotes for all the televisions?  
 25 **A No.**

1 **Q** What did you do with the remotes  
 2 for the televisions?  
 3 **A I didn't do -- I did not do**  
 4 **anything with the remotes to the**  
 5 **televisions. It should still be in that**  
 6 **home, or she took them. I didn't take**  
 7 **any TVs, so I don't have -- have a need**  
 8 **for the remotes.**  
 9 **Q** Okay. Did you keep all the keys  
 10 to the Subaru?  
 11 **A Did I keep all the keys to the**  
 12 **Subaru?**  
 13 **Q** Did you take all the keys to the  
 14 Subaru with you when you left the home?  
 15 **A I took the one key that I had,**  
 16 **and the other one was attached to a**  
 17 **magnet on the bottom of my -- of my**  
 18 **lunch box.**  
 19 **Q** Did you take your lunch box with  
 20 you?  
 21 **A Yes. So I ended up with both**  
 22 **keys, is the answer to the question.**  
 23 **Q** Yes, that's what I was asking.  
 24 **A Yes. I'm trying -- trying --**  
 25 **trying to get -- get to the point.**

1 **Q** How much was your mortgage at  
 2 your previous house per month, the one  
 3 that you sold?  
 4 **A It was almost \$800 a month.**  
 5 **Q** \$800 a month. And you realized  
 6 \$250,000 on the house that you sold; is  
 7 that correct?  
 8 **A Yes, ma'am, that's correct.**  
 9 **Q** 253, I think, something like  
 10 that.  
 11 **A Right.**  
 12 **Q** Okay. And, so, you would have a  
 13 down payment for a new home; is that  
 14 correct?  
 15 **A For the -- with the 250,000?**  
 16 **Q** Yes, sir.  
 17 **A If I had 250,000.**  
 18 **Q** Okay. Well, I mean, presumably  
 19 you could sell off everything you've  
 20 bought and get back to that number. Is  
 21 that fair?  
 22 **A No, ma'am.**  
 23 **Q** Okay.  
 24 **A The money that I've invested**  
 25 **with the attorneys, the trailer.**

1 **Q** Okay. But you could get a  
 2 similar house for 300,000. Is that  
 3 right?  
 4 **A No.**  
 5 **Q** Okay. How big was the last  
 6 house?  
 7 **A It was almost 1,800 square feet,**  
 8 **had three acres, and a pond, and had a**  
 9 **nice shop in the back.**  
 10 **Q** Okay. But instead of spending  
 11 your money on rent, you could purchase a  
 12 house with what you got back and pay  
 13 similar, maybe just a little bit more in  
 14 a mortgage, correct?  
 15 **A No.**  
 16 **Q** Okay. Why do you say that?  
 17 **A Because I cannot go get the same**  
 18 **interest rate that I had. I cannot go**  
 19 **get the same payment that I had because**  
 20 **the home prices have gone up, and**  
 21 **interest rates have gone up, and they've**  
 22 **not started to come back down.**  
 23 **Q** Okay. Your interest rate was  
 24 4.8 percent, correct?  
 25 **A It was 4 percent.**

1 Q It wasn't 4.8 percent?  
 2 A I was -- I thought I got it down  
 3 to 4 percent. Is that not correct? I  
 4 thought it was at 4, not 4.8.  
 5 Q Okay. I don't answer questions,  
 6 just you do.  
 7 So, and interest rates are at  
 8 5.99 right now. Have you looked at that  
 9 lately?  
 10 A No one -- I have. And no one  
 11 has mentioned a 5.99 interest rate.  
 12 Q Okay. When was the last time  
 13 you asked, and who did you ask?  
 14 A Well, I asked a realtor, and  
 15 then I went online and Googled it.  
 16 Q Okay. When did you do that?  
 17 A That was last week.  
 18 Q Do you recall the incident in  
 19 2022 with Avery, the bird that you two  
 20 had?  
 21 A An incident?  
 22 Q Uh-huh. (Affirmative).  
 23 A Please define the incident.  
 24 Q Where Avery bit you on the lip.  
 25 A That was no incident. Avery

1 just bit me on the lip.  
 2 Q And what did you do after she  
 3 did that?  
 4 A Nothing.  
 5 Q You didn't beat on her with a  
 6 wire cage brush?  
 7 A No.  
 8 Q Okay. How did she end up with a  
 9 bruise?  
 10 A I have no idea. I didn't know  
 11 that she was bruised.  
 12 Q Okay. Did Ms. Kennedy have to  
 13 remove you from the area in order to get  
 14 you off the bird?  
 15 A I have no idea what you're  
 16 talking about.  
 17 Q Have you done anything to keep  
 18 from -- strike that.  
 19 Have you ever told Ms. Kennedy  
 20 that you threw -- specifically, in June  
 21 of 2022, did you tell Ms. Kennedy that  
 22 you threw the dogs into a brick wall?  
 23 A No.  
 24 Q In looking through your bank  
 25 statements, it looked to me like you

Lie

1 monthly balance in your checking account  
 2 was around 900 to \$1,500 a month,  
 3 average.  
 4 And now, looking at your bank  
 5 accounts, it's closer to 5,000 every  
 6 month. Is that accurate? Is there a  
 7 reason for that?  
 8 A It sounds like you're doing a  
 9 better job keeping up with it than I am.  
 10 No, I don't know that that's actually  
 11 accurate. But anyway, go ahead.  
 12 Q Okay. You understand  
 13 Ms. Kennedy inherited that house; is  
 14 that correct?  
 15 A No.  
 16 Q Okay. What's your understanding  
 17 of how she came to get that house?  
 18 A Can I repeat verbatim? She sold  
 19 her house in Scottsdale, Arizona, and  
 20 used the money from the sale of the home  
 21 in Scottsdale to purchase the home in  
 22 Bon Aqua, Tennessee.  
 23 Q And was that prior to marriage,  
 24 sir?  
 25 A Prior to our marriage.

1 Q Okay. How long prior to your  
 2 marriage was that?  
 3 A I don't know. She says that  
 4 ~~Jeff Elias died in 2010~~. I don't know  
 5 how long they had had the home prior,  
 6 and you're asking me variables that I  
 7 can't answer. I don't know.  
 8 Q In your discovery, you  
 9 highlighted a \$2,500 payment made on  
 10 February the 13th, 2023 to the Capital  
 11 One account that you had made. Do you  
 12 recall highlighting that payment?  
 13 A Sounds right.  
 14 Q Okay. You made that specific  
 15 payment for the Apple phone and the  
 16 watch that you bought at the Apple  
 17 Store. Is that correct?  
 18 A Yes, that would be correct.  
 19 Q Okay. That wasn't monies that  
 20 were put towards the house, was it?  
 21 A No.  
 22 Q Okay. Under your expenses in  
 23 your discovery, you listed a \$6,000  
 24 expense for storage. Was that when you  
 25 bought that trailer?

- 1 **A Yes.**
- 2 **Q** Okay. Is there a reason why you  
3 put the expense of storage but didn't  
4 disclose that it was a trailer that you  
5 had bought?
- 6 **A No particular reason. Maybe,**  
7 **again, not understanding. Maybe I**  
8 **didn't answer it the correct way. It**  
9 **could be a flaw on my part.**
- 10 **Q** Okay. We're going to go back to  
11 those cameras that you placed in the  
12 bedroom. You placed it on top of a  
13 bureau behind a teddy bear; is that  
14 correct?
- 15 **A No.**
- 16 **Q** Okay. Do you have any reason  
17 that you can say on the record today why  
18 it was placed on top of a bureau behind  
19 a teddy bear?
- 20 **A I could not answer that**  
21 **question.**
- 22 **Q** Okay.
- 23 **A Can I explain something, though?**  
24 **Can I add -- add to that?**
- 25 **Q** Absolutely.

- 1 **A Okay. What I'd like to**  
2 **add to that is, these cameras are**  
3 **battery-operated cameras. And when**  
4 **you're walking from one room to another,**  
5 **and the camera's battery is getting low**  
6 **and you need to go put another battery**  
7 **in it, but you've got to go run to**  
8 **somewhere else, and you set -- you set**  
9 **the camera down to go get it, you know,**  
10 **with the intent of going to get a**  
11 **battery, but then you get distracted**  
12 **with something else. So the camera just**  
13 **sits there.**
- 14 **Q** Some of the cameras have got  
15 plugs, though; is that correct?
- 16 **A Some of them did.**
- 17 **Q** And this one in particular had a  
18 plug that was sitting up there?
- 19 **A It did.**
- 20 **Q** Okay. And so, you would recall  
21 plugging it in; is that correct?
- 22 **A I do not recall plugging one in.**
- 23 **Q** Is there a reason why you don't  
24 recall that?
- 25 **A I don't believe that I did. We**

- 1 **had -- we had the ones -- the**  
2 **battery-operated ones. And I remember,**  
3 **specifically, walking through thinking,**  
4 **oh, man, I've got to replace the battery**  
5 **in this. And I set it down on the**  
6 **dresser, and I'm like, well, I got to go**  
7 **do this, you know, and it probably got**  
8 **left there.**
- 9 **Q** You and Ms. Kennedy make the  
10 same amount of income; is that correct?
- 11 **A No.**
- 12 **Q** Okay. What's the difference in  
13 your incomes?
- 14 **A Well, I don't know exactly**  
15 **what she makes now. She got two**  
16 **promotions.**
- 17 **Q** How do you know that, sir?
- 18 **A Because she told me that before**  
19 **I exited the marital home. She was**  
20 **moving to a VP position, and then going**  
21 **to be moved into a director position.**
- 22 **Q** Okay. But you don't think your  
23 incomes are comparable?
- 24 **A I don't think she's reporting**  
25 **her accurate income.**

- 1 **Q** Okay. Has she worked somewhere  
2 other than ~~ConnectWise~~?
- 3 **A I don't know, okay.**
- 4 **Q** Do you think ~~ConnectWise~~ would  
5 lie for her about what income they've  
6 paid her?
- 7 **A They probably wouldn't.**
- 8 **Q** Okay. So why do you think she's  
9 lying about her income then?
- 10 **A Well, that's a good question. I**  
11 **mean, I don't know what she makes.**
- 12 **Q** And --
- 13 **A All I know is she got -- she**  
14 **supposedly got two promotions for her**  
15 **job.**
- 16 **Q** Okay. And you don't know why  
17 you suspect she's lying about her  
18 income?
- 19 **A Well, she just got two**  
20 **promotions for her job. You would**  
21 **expect to go from a -- you know, just a**  
22 **peon down here to a VP position, then**  
23 **move to a director position, that's**  
24 **going to come with a -- with a healthy,**  
25 **you know, raise within those -- you**

1 **know.**  
 2 **Q** But just a minute ago, you said  
 3 you don't think she's disclosed her  
 4 correct income. Why did you say that?  
 5 **A** **Because of her new positions**  
 6 **moving up. Has she disclosed -- has she**  
 7 **went from X-amount of money doing this**  
 8 **for the company, as opposed to, well,**  
 9 **now she's doing this for the company?**  
 10 **And it was supposed to have been a**  
 11 **promotion. So that would have obviously**  
 12 **bumped her up in pay.**  
 13 **Q** Ms. Kennedy traveled during your  
 14 marriage; is that correct?  
 15 **A** **Some.**  
 16 **Q** And there was one time when she  
 17 went to Orlando, Florida on her own in  
 18 November of 2023; is that correct?  
 19 **A** **That is correct.**  
 20 **Q** And you required that while she  
 21 was gone, she had to FaceTime you  
 22 routinely to make sure she wasn't with  
 23 somebody else; is that correct?  
 24 **A** **It wasn't a requirement. I**  
 25 **asked her to FaceTime when she got a**

1 **break. You know, I'd like to see her.**  
 2 **I'd like to talk to her. We were**  
 3 **starting to have some bumps in the road**  
 4 **in this marriage.**  
 5 **Q** Okay.  
 6 **A** **And I wasn't feeling really**  
 7 **comfortable.**  
 8 **Q** And you made her carry an AirTag  
 9 with her on that trip; is that correct?  
 10 **A** **No, I did not make her carry an**  
 11 **AirTag.**  
 12 **Q** Okay. What did you make her  
 13 carry so you could keep up with her?  
 14 **A** **I didn't make her carry**  
 15 **anything.**  
 16 **Q** Okay. Did you ask her to carry  
 17 the AirTag?  
 18 **A** **No, I didn't ask her to carry an**  
 19 **AirTag.**  
 20 **Q** Did she carry an AirTag?  
 21 **A** **I don't know if she did or not.**  
 22 **Q** You've included a gentleman by  
 23 the name of **Allen Dan** on your witness  
 24 list. Who is that?  
 25 **A** **Oh, that's Anna's **cousin**.**

1 **Q** Okay. And why did you include  
 2 his name?  
 3 **A** **Because I feel he would have**  
 4 **some pertinent information for our case.**  
 5 **Q** Okay. What is the pertinent  
 6 information you think he has?  
 7 **A** **That he can attest to how Anna**  
 8 **has been most of her life.**  
 9 **Q** Okay. Did you do that to  
 10 intimidate her?  
 11 **A** **Absolutely not.**  
 12 **Q** Because you know he molested her  
 13 as a child for over a decade?  
 14 **A** **But we don't know that for sure.**  
 15 **Do you have any documentation of that?**  
 16 **Q** I don't answer questions.  
 17 When was the last time you  
 18 talked --  
 19 **A** **You don't do good at asking them**  
 20 **either.**  
 21 **Q** When was the last time you  
 22 talked to **Allen Dan**?  
 23 **A** **I don't know that I ever talked**  
 24 **to **Allen Dan**.**  
 25 **Q** Then why did you put him on your

1 list?  
 2 **A** **Because I felt he had pertinent**  
 3 **information from my case.**  
 4 **Q** Okay. But you don't know what  
 5 he would say?  
 6 **A** **Well, I'm -- I got a feeling I**  
 7 **know what he would say.**  
 8 **Q** Okay. So you put him on your  
 9 list just to kind of harass Ms. Kennedy?  
 10 **A** **Absolutely not.**  
 11 **Q** But you don't know why you put  
 12 him on the list because you've not  
 13 talked to him? Yes or no?  
 14 **A** **Rephrase that question.**  
 15 **Q** Do you know why you put him on  
 16 the list?  
 17 **A** **Yes, I feel he has pertinent**  
 18 **information for this case.**  
 19 **Q** But you don't know what that  
 20 information is, do you?  
 21 **A** **Yeah, I actually do.**  
 22 **Q** How do you know what information  
 23 that is?  
 24 **A** **Well, I think you -- okay. It's**  
 25 **a speculation more than an actual "I**

1 know." And I'm pretty sure what I'm  
2 going to hear, and what everybody else  
3 is going to hear. The statement that he  
4 would -- he would make is, you know,  
5 he -- you know, the truth hasn't been  
6 the most forthcoming in that.

7 Q Okay. And you've known that for  
8 how long?

9 A Well, when I started figuring  
10 out that Anna's been manipulating --  
11 manipulative in this marriage, why would  
12 she not be manipulative with her own  
13 family?

14 Q Okay. So you've said she's been  
15 manipulative, but you've begged her to  
16 get back with you. Is that correct?

17 A I don't think that --

18 Q Yes or no, first.

19 A Well, wait a minute. Back up  
20 the question.

21 Q Have you begged her to get back  
22 with you?

23 A I tried to reconcile the  
24 marriage, but I don't know about  
25 begging.

1 A I'd have to, you know, get a  
2 calendar out and try to figure this out.  
3 But it was in April of '24.

4 Q And did you take any mementos  
5 with you that day? Did you take  
6 anything from the home that day?

7 A Not that I'm aware of. I left  
8 my landscape trailer there, and I went  
9 to work. And she received my answer to  
10 her complaint of divorce, and we were --  
11 I was supposed to have gone back down  
12 there.

13 And then she tells me -- and I  
14 have the text messages to prove that. I  
15 was supposed to have gone back down  
16 there after work, and when she got the  
17 answer to my complaint of divorce, she  
18 changed her mind again.

19 Q And that was the last time, was  
20 in April of 2024?

21 A Yes, ma'am.

22 Q When you help moved her to  
23 [REDACTED] Georgia?

24 A Yes, ma'am.

25 Q And you didn't have any issue

1 Q But she's been so manipulative  
2 of you that you begged her back.

3 A I did not beg her back.

4 Q Okay. Sir, when did you tell  
5 anyone that you last had sex with  
6 Ms. Kennedy?

7 A I'm sorry?

8 Q When did you last have sex with  
9 Ms. Kennedy?

10 A When she told me that she was  
11 interested in reconciling our marriage,  
12 and I moved her from Tennessee to [REDACTED]  
13 Georgia. We had sex in [REDACTED].

14 Q Okay. You moved her to [REDACTED]?

15 A Yes, I did.

16 Q And on what date was that?

17 A That would have been April  
18 something of '24. She had to borrow my  
19 body wash to get cleaned up with.

20 Q And where did you have sex with  
21 her?

22 A I'm sorry?

23 Q Where did you have sex with her?

24 A In her home, in her room.

25 Q And what date was that?

1 with her moving to [REDACTED]; is that  
2 correct?

3 A No, ma'am.

4 Q Was [REDACTED] there when this  
5 happened?

6 A No, ma'am.

7 Q Okay. Who's living with her  
8 right now, do you know?

9 A That's a good question, and I  
10 don't know.

11 Q Okay. Have you been down to  
12 [REDACTED], Georgia to spy on her?

13 A I have not.

14 Q Okay. When was the last time  
15 you went to [REDACTED], Georgia?

16 A Well, I had to go through [REDACTED],  
17 Georgia to get to [REDACTED], Georgia  
18 to pick up my six totes, because that's  
19 all she had of mine. Do you not  
20 remember that? I know, you don't --

21 Q I don't answer --

22 A -- answer questions.

23 Q -- questions.

24 And that's the last time you  
25 testify that you have been to [REDACTED].

1 Georgia?

2 **A** That is the last time I've been

3 to **[REDACTED]**, Georgia.

4 **Q** When, prior to picking up your

5 totes, had you been to **[REDACTED]**, Georgia?

6 **A** I had been to **[REDACTED]**, Georgia a

7 couple of times in helping her relocate

8 to **[REDACTED]**, Georgia.

9 **Q** Say that one more time.

10 **A** When she was -- when I was

11 helping relocate her in April of '24 to

12 -- from Bon Aqua to **[REDACTED]**, that's when I

13 went down there.

14 **Q** And what month did you pick up

15 the totes?

16 **A** That would have been October.

17 **MS. DUKE:** I'm just about

18 done, Doug. I need --

19 **THE WITNESS:** Thank Jesus.

20 **MS. DUKE:** -- to talk with her

21 for just a --

22 **MR. BATES:** All right. My

23 client's going to go warm up.

24 **THE WITNESS:** Yeah.

25 (A recess was taken.)

REPORTER'S CERTIFICATE

I, Tami K. Hornick, LCR #199, Licensed and Certified Court Reporter in and for the State of Tennessee,

DO HEREBY CERTIFY that the above deposition or hearing was reported by me, and that the foregoing transcript is a true and accurate record to the best of my knowledge, skills and ability.

I FURTHER CERTIFY that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I FURTHER CERTIFY that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 11th day of August, 2025.

*Tami K. Hornick*

Tami K. Hornick, CCR, LCR #199  
Certified and Licensed  
Court Reporter for  
the State of Tennessee

1 **MS. DUKE:** That's all I have.

2

3 /Signature Waived/

4 AND FURTHER THIS DEPONENT SAITH NOT

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1 IN THE CHANCERY COURT  
 2 FOR HICKMAN COUNTY,  
 3 AT CENTERVILLE

---

4 ANNA DEW KENNEDY, )  
 5 Plaintiff(s), )  
 6 V. ) 24-CV-7939  
 7 MATTHEW DEAN KENNEDY, )  
 8 Defendant(s). )

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11 The Deposition of:  
 12  
 13  
 14 ANNA DEW KENNEDY  
 15 June 20, 2025

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1 The deposition of ANNA DEW  
 2 KENNEDY was taken by agreement, at the  
 3 Hickman County Courthouse, Centerville,  
 4 Tennessee, on June 20, 2025, pursuant to  
 5 the provisions of the Tennessee Rules of  
 6 Civil Procedure.  
 7 All formalities as to notice,  
 8 caption, certificate, reading and signing  
 9 of the deposition are waived. All  
 10 objections, except as to the form of the  
 11 questions, are reserved to the hearing.

12 **APPEARANCES:**

---

13 For the Plaintiffs:

14 Hilary H. Duke, Esq.  
 15 210 East College Street  
 16 Dickson, Tennessee 37055

17 For the Defendants:

18 Douglas T. Bates, IV, Esq.  
 19 203 East Public Square  
 20 Centerville, Tennessee 37033

21 Also Present: Matthew Kennedy

22  
23  
24  
25

1 INDEX

2 EXAMINATION .....PAGE

3 Mr. Bates ..... 4

---

6 EXHIBITS

7 No. 1-(Late-filed) 2024 Tax 15  
 8 Return.

9 No. 2-(Late-filed) Closing 51  
 10 documents for Bon Aqua home.

11 No. 3-(Last-filed) Audio 60  
 12 Recording.

13  
14  
15  
16  
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18  
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1 ANNA DEW KENNEDY,  
 2 having been first duly sworn or affirmed,  
 3 testified as follows:

4 **DIRECT EXAMINATION**

5 **BY MR. BATES:**

6 **Q** State your full name.  
 7 **A** Anna Dew Kennedy.  
 8 **Q** What do you prefer I call you?  
 9 Ms. Anna? Ms. Kennedy?  
 10 **A** How about just Anna?  
 11 **Q** All right, Anna, I'll take you  
 12 up on it.  
 13 **A** I'm not teaching.  
 14 **Q** Have you ever given a deposition  
 15 before?  
 16 **A** Yes, three decades ago.  
 17 **Q** Okay. I'll refresh your memory  
 18 on them. You've seen one already. It  
 19 went very well. I will ask questions.  
 20 You will answer the questions. If you  
 21 don't understand the question, I'll  
 22 rephrase. If you answer the question, I  
 23 take it to mean you understood it.  
 24 Avoid head nods or huh-uhs. If  
 25 you need to take a break at any time,

1 you can. Either answer the question, or  
 2 we'll come back and the question will be  
 3 posed. The oath you gave is the same  
 4 oath you'll give at trial, which means  
 5 the laws of perjury apply to your  
 6 answers here, just as if it were in  
 7 trial. Any questions about that so far?  
 8 **A None.**  
 9 **Q** You have prepared for today's  
 10 deposition?  
 11 **A As much as reviewing**  
 12 **information, sure.**  
 13 **Q** Okay. And what information have  
 14 you reviewed?  
 15 **A Just numbers, numbers**  
 16 **information, financial information.**  
 17 **Q** Are there any documents you've  
 18 reviewed that have not been exchanged in  
 19 discovery?  
 20 **A No.**  
 21 **Q** Have you reviewed any videos  
 22 that have not been disclosed in  
 23 discovery?  
 24 **A No.**  
 25 **Q** And how old are you?

1 **A 54.**  
 2 **Q** How would you describe your  
 3 physical health?  
 4 **A Overall excellent physical**  
 5 **health. My joints don't seem to agree,**  
 6 **but...**  
 7 **Q** Any other health problems  
 8 besides joints?  
 9 **A No.**  
 10 **Q** Are you under the treating care  
 11 of any physician for a recurring problem  
 12 of any kind?  
 13 **A No.**  
 14 **Q** How's your mental health?  
 15 **A Good.**  
 16 **Q** How often do you drink alcohol?  
 17 **A One or two weekends a month.**  
 18 **Either a Friday or a Saturday.**  
 19 **Q** During the marriage, how much  
 20 did you drink?  
 21 **A Five separate occasions.**  
 22 **Q** Just five separate occasions?  
 23 **A Yeah.**  
 24 **Q** And were you intoxicated at  
 25 those five times?

1 **A Three of them.**  
 2 **Q** Okay. Have you at times, in  
 3 your past, considered yourself an  
 4 alcoholic?  
 5 **A No.**  
 6 **Q** Have you ever been treated for  
 7 any alcohol issues like AA or --  
 8 **A Oh, no.**  
 9 **Q** All right. Do you have any  
 10 STDs?  
 11 **A No.**  
 12 **Q** Have you ever been treated for  
 13 them?  
 14 **A No.**  
 15 **Q** And are you currently -- This  
 16 online company, are you currently  
 17 working for them still?  
 18 **A ConnectWise, yes.**  
 19 **Q** And what do you do for them?  
 20 **A I'm a sales engineer.**  
 21 **Q** You work remotely?  
 22 **A Yes.**  
 23 **Q** What's your income?  
 24 **A My 2024 taxes put it at \$1,370.**  
 25 **Q** And what's your current income?

1 **A Same.**  
 2 **Q** Same?  
 3 **A Yeah.**  
 4 **Q** Any raises at the end of 2024?  
 5 **A No. In this economy? No.**  
 6 **Q** I thought President Trump was  
 7 going to fix that.  
 8 So let me ask you this: We're  
 9 going to talk about the time of meeting  
 10 Mr. Kennedy. We're going to kind of put  
 11 a pin in there and work back. So when  
 12 did you meet Mr. Kennedy?  
 13 **A July of 2021, I believe.**  
 14 **Q** Okay. And how did you meet him?  
 15 **A Facebook Dating.**  
 16 **Q** Was it like a forum where you  
 17 meet people?  
 18 **A There's a -- Facebook has an**  
 19 **add-on app called Facebook Dating where**  
 20 **you can swipe left or swipe right on**  
 21 **people and meet up or not meet up.**  
 22 **Q** Where were you living at the  
 23 time?  
 24 **A In Bon Aqua.**  
 25 **Q** And how long had you lived

1 there?  
 2 **A Since the end of 2017.**  
 3 **Q** And you moved here from Arizona?  
 4 **A Correct.**  
 5 **Q** And were you married when you  
 6 moved here?  
 7 **A No.**  
 8 **Q** You were divorced when you moved  
 9 here?  
 10 **A Yes. I was in a relationship**  
 11 **with Jeff Elias, but not married.**  
 12 **Q** Okay. And then you subsequently  
 13 married him?  
 14 **A No, we were never married.**  
 15 **Q** Okay. How was the home in Bon  
 16 Aqua purchased?  
 17 **A He purchased it.**  
 18 **Q** Okay. ~~Jeff purchased the home?~~  
 19 **A Correct.**  
 20 **Q** Was there a mortgage on it?  
 21 **A Huh-uh. (Negative)**  
 22 **Q** Is that a no?  
 23 **A That -- oh, I'm sorry, no.**  
 24 **There was no mortgage on it. He had**  
 25 **received an inheritance from his**

1 **mother's passing, and he used a portion**  
 2 **of that to pay for the home in Bon Aqua.**  
 3 **Q** Okay. And when did ~~Jeff~~ pass  
 4 away?  
 5 **A** ~~20 -- September 2018~~  
 6 **Q** Okay. And was his estate  
 7 probated?  
 8 **A Yeah.**  
 9 **Q** Who probated it?  
 10 **A Your father.**  
 11 **Q** Okay. And was -- To your  
 12 knowledge, was there a Will that --  
 13 **A There was a Will.**  
 14 **Q** -- left everything to you?  
 15 **A Yeah. Not everything, but**  
 16 **the --**  
 17 **Q** Left the home?  
 18 **A -- house, yes.**  
 19 **Q** And so you received it free and  
 20 clear?  
 21 **A That is correct.**  
 22 **Q** Since the 2018 receipt of  
 23 inherited property, did you encumber it  
 24 by any mortgage?  
 25 **A No.**

1 **Q** Line of credit?  
 2 **A No.**  
 3 **Q** Was a judgment ever recorded  
 4 against it?  
 5 **A No.**  
 6 **Q** Lien, to your knowledge?  
 7 **A No.**  
 8 **Q** All right. At the time of  
 9 meeting Mr. Kennedy, what else was your  
 10 net worth consisting of?  
 11 **A I inherited his retirement**  
 12 **account, which was worth about \$50,000**  
 13 **at the time, a brokerage account**  
 14 **worth -- I think at the time I inherited**  
 15 **it, it was worth \$20,000.**  
 16 **Q** And I assume that's account --  
 17 ~~Charles Schwab account ending 8793?~~  
 18 **A Correct.**  
 19 **Q** And the retirement account, was  
 20 that account 9621?  
 21 **A In Schwab, yes.**  
 22 **Q** Okay. And how much was the 8793  
 23 worth at the time of meeting  
 24 Mr. Kennedy?  
 25 **A About \$50,000.**

1 **Q** Okay. You had your own  
 2 individual retirement account?  
 3 **A Yes.**  
 4 **Q** And how much was in it?  
 5 **A At the time that I met him? Not**  
 6 **much, because I hadn't been working for**  
 7 **ConnectWise all that long. It was**  
 8 **probably -- I can't even guess, 17,**  
 9 **\$0,000 something like that. 17 or**  
 10 **\$0,000.**  
 11 **Q** Okay.  
 12 **A And that is a wild guess, but...**  
 13 **Q** Were you operating a farm or an  
 14 LLC at the time of Mr. Kennedy?  
 15 **A A farm, and I think it was**  
 16 **not -- not an LLC, a PC.**  
 17 **Q** Okay. Did it ever become an  
 18 LLC?  
 19 **A No. ~~No. I owned an LLC that~~**  
 20 **was -- I believe we discontinued it at**  
 21 **the time that he passed.**  
 22 **Q** What was the name of it?  
 23 **A Happy Hooves**  
 24 **Q Happy Hooves**  
 25 **A Happy Hooves yeah.**

1 Q What's the name of the -- You  
 2 claimed a business loss in 2022 and  
 3 2023.  
 4 A Oh, did he? So ~~Scott~~  
 5 Q -- ~~husbands~~  
 6 A ~~Husbands~~ yes, has done our  
 7 taxes forever. And he may have decided  
 8 to keep it open, the LLC open, I don't  
 9 know.  
 10 Q Okay.  
 11 A I hope not, because I haven't  
 12 filed any documents for an LLC.  
 13 Q Have you done your 2024 taxes?  
 14 A Yes, they're right there.  
 15 Q Okay.  
 16 MS. DUKE: Do you need to  
 17 review them, Doug?  
 18 MR. BATES: That'd be great.  
 19 MS. DUKE: I don't mind.  
 20 MR. BATES: We'll just --  
 21 afterwards we'll -- I'll get his.  
 22 THE WITNESS: It's in the back  
 23 part. Actually, the tax return, I  
 24 think, is in back. That's just my  
 25 supporting documents.

1 MS. DUKE: Your notes and  
 2 stuff are not -- oh, okay. But  
 3 it's all tax-related.  
 4 THE WITNESS: It's all  
 5 tax-related.  
 6 BY MR. BATES:  
 7 Q Are these, I guess, updated --  
 8 A Schedules? Yeah.  
 9 Q Correct. From what accounts  
 10 made what income?  
 11 A I guess -- I think -- I could  
 12 send you a copy of that, too, if you  
 13 want.  
 14 Q Okay. I think we'll supplement  
 15 discovery both ways.  
 16 So it's clear, what I'm going to  
 17 do is, when we supplement discovery, I'm  
 18 going to late-filed to the court  
 19 reporter Late-filed Exhibit 1, this  
 20 20 -- I apologize, this isn't 2024.  
 21 This is --  
 22 A Yeah, look in the very back.  
 23 Sorry, in the very back in the folder of  
 24 the -- there you go.  
 25 Q Oh, okay.

1 A That was just -- that's just my  
 2 supporting documents. You've already  
 3 got the 2023.  
 4 Q Correct. So I'm going to file  
 5 the 2024 tax return, because I'll be  
 6 referring to it.  
 7 (2024 Tax Return to be provided  
 8 and later marked as Exhibit 1.)  
 9 BY MR. BATES:  
 10 Q So it appears you have a  
 11 Schedule F as a horse farm.  
 12 A Do they continue that again?  
 13 Q And you have a net loss of  
 14 ~~\$53,000~~  
 15 A Sounds about right.  
 16 Q And is this -- Prior years it  
 17 was ~~Happy Hooves~~  
 18 A I did not establish a new LLC,  
 19 if that's what you're asking.  
 20 Q Okay. So was the LLC just  
 21 dissolved?  
 22 A As far as I know.  
 23 Q Okay. You distributed ~~10,000~~  
 24 from your IRA?  
 25 A As an RMD? Yeah. That

1 inherited IRA has a RMD requirement  
 2 every year.  
 3 Q Beginning at what age?  
 4 A Until I turned 70.  
 5 Q I see. You depreciated assets.  
 6 Let me go over them. What was the date  
 7 of your marriage again?  
 8 A 9/3/2022.  
 9 Q Okay. So there was a four-stall  
 10 pole barn of ~~152,000~~ date-in-service  
 11 6/3/24.  
 12 A Correct.  
 13 Q And that was installed in a  
 14 Tennessee home?  
 15 A No.  
 16 Q Where was it installed?  
 17 A The ~~main~~ home.  
 18 Q In the Georgia home.  
 19 A Yeah. That place had no fencing  
 20 and no barn when I bought it.  
 21 Q Okay. And the other items, I'll  
 22 just go over them, the horse trailer,  
 23 John Deere tractor, tractor implements,  
 24 farm buildings, fencing improvements,  
 25 fencing and fencing improvements, all

1 were purchased prior to the marriage  
 2 with Mr. Kennedy?  
 3 **A The horse trailer, the tractor,**  
 4 **all the implements were purchased prior**  
 5 **to the marriage. The pole barn and the**  
 6 **fencing were purchased in May and June**  
 7 **of 2024.**  
 8 **Q** You're continuing to run a farm?  
 9 **A I guess, yes.**  
 10 **Q** And what is --  
 11 **A It's a hobby farm.**  
 12 **Q** Okay. Have you ever been  
 13 audited for this hobby farm?  
 14 **A No.**  
 15 **Q** All right. Are you aware there  
 16 was a change, I think it was several  
 17 years ago, that kind of tamped down on  
 18 Schedule Fs that showed a loss?  
 19 **A No.**  
 20 **Q** Prior to 2024 and 2023 and 2022,  
 21 these were joint returns, correct?  
 22 **A 2023 was the last joint return,**  
 23 **yes.**  
 24 **Q** And that had a Schedule F with  
 25 Matthew Kennedy as the name of the

1 **A No.**  
 2 **Q** And the computation of how much  
 3 was spent in feed, vet bills,  
 4 depreciation, things of that nature, did  
 5 you compute that, did Matthew, or did  
 6 both of you?  
 7 **A I did.**  
 8 **Q** Okay.  
 9 **A I did. I get an annual roundup**  
 10 **from each of my credit cards.**  
 11 **Q** Automatically generated by the  
 12 credit card?  
 13 **A Yes.**  
 14 **Q** And then you just submit that?  
 15 **A Yes.**  
 16 **Q** Okay. When you met Mr. Kennedy,  
 17 did you think he had what's been  
 18 diagnosed as **generalized anxiety**  
 19 **disorder**?  
 20 **A When I met him? No.**  
 21 **Q** Did he have any signs or  
 22 symptoms of **anxiety**?  
 23 **A Do you mean like -- Give me a**  
 24 **time range. Are you talking about,**  
 25 **like, the day I met him, or in the next**

1 proprietor, correct?  
 2 **A I don't know why he would be the**  
 3 **name of the proprietor, but...**  
 4 **Q** Did you participate in the  
 5 creation of the tax return?  
 6 **A I drop off the papers.**  
 7 **Q** Okay.  
 8 **A That's all I do.**  
 9 **Q** Who gave all the information?  
 10 **A I dropped off the paperwork.**  
 11 **That's all I did. I made the assumption**  
 12 **that his name was first on anything**  
 13 **because we live in a patriarchal**  
 14 **society. Not -- not because he was**  
 15 **responsible for any of that.**  
 16 **Q** Well, did you review the tax  
 17 returns prior to them being filed?  
 18 **A They were filed electronically,**  
 19 **so no.**  
 20 **Q** You never reviewed them?  
 21 **A I looked at them. I didn't see**  
 22 **anything that looked out of whack to me.**  
 23 **Q** Were you aware that the name of  
 24 the sole proprietor on the Schedule F  
 25 was Matthew Kennedy?

1 **week? On the day I met him? No, I**  
 2 **didn't -- I didn't recognize any signs**  
 3 **or symptoms.**  
 4 **Q** From that date until now, have  
 5 you identified symptoms that make you  
 6 think this gentleman has **generalized an**  
 7 **xiety disorder**?  
 8 **A No.**  
 9 **Q** You don't think he ever had an  
 10 **anxiety disorder**?  
 11 **A I don't know if he did or not.**  
 12 **Q** Did he ever exhibit symptoms of  
 13 anxiety to you?  
 14 **A I'm not familiar with the**  
 15 **symptoms of **anxiety**, so I can't -- I**  
 16 **can't say.**  
 17 **Q** Did you refer -- Did you ask him  
 18 to go see a psychiatrist?  
 19 **A Yes.**  
 20 **Q** What made you say that?  
 21 **A He would have intermittent**  
 22 **outbursts of anger that were terrifying.**  
 23 **Q** Okay.  
 24 **A So, to me it appeared like rage,**  
 25 **not **anxiety**.**

1 Q Okay. You thought it was rage.

2 A Uh-huh. (Affirmative).

3 Q Have you since come to know that

4 it was ~~correct~~?

5 A No.

6 Q This was never discussed in the

7 marriage?

8 A Was it discussed in the -- It

9 was discussed in the marriage.

10 Q Okay.

11 A But I'm not sure what the actual

12 underlying cause is.

13 Q All right. My understanding is

14 the ~~50,000, account 8793~~, virtually

15 nothing has happened with that account?

16 A Correct.

17 Q The brokerage account, 8793, is

18 down to approximately ~~260,000~~. Is

19 that --

20 A Probably -- probably right

21 around there, yeah.

22 Q Where has that money gone?

23 A Thanks to President Trump for

24 Nvidia stock tanking, stock tanking.

25 Honestly, I dumped it before it tanked

1 out, and then bought it back again. So

2 I didn't lose a lot, but I lost in one

3 single day, ~~50,000~~.

4 Q Okay. When did you start

5 selling the stock?

6 A It was just Nvidia. And it

7 was -- it was the day that he -- it was

8 the day before tariffs was supposed to

9 start.

10 Q So it was after the filing of

11 the divorce?

12 A Oh, yeah.

13 Q And prior to that time, have you

14 moved any money out of this account

15 other than selling stock?

16 A You mean during the marriage?

17 Q Let me rephrase. When I say

18 "selling stock," when you sell stock, do

19 you reinvest the money back into this

20 account?

21 A And when I -- when I sell stock,

22 typically the money remains in that

23 account until I decide what other

24 entities I'd like to buy, ETFs or

25 stocks.

1 Q In, like, a sweep account?

2 A In, like, a sweep, yeah.

3 Q And my understanding of

4 Mr. Kennedy's ~~Charles Schwab~~ account,

5 the money's all still in this sweep

6 account. No individual stock has been

7 purchased or anything like that. Is

8 that your understanding?

9 A I don't know. I gave him some

10 advice.

11 Q Okay.

12 A He should have followed, but...

13 Q You've gone through the bank

14 accounts?

15 A Yeah.

16 Q And you agree the money's all in

17 sweep accounts. It's not stock or --

18 A Correct.

19 Q -- mutual fund holdings?

20 A As far as I know.

21 Q Okay. So all the money, when

22 you sell stock, it just stays in the

23 sweep account?

24 A Generally, yes.

25 Q Has there been any money since

1 receipt that the money went outside of

2 this brokerage account?

3 A Well, absolutely. So when I

4 sold my house in Bon Aqua, that money

5 was deposited in that brokerage account.

6 The sweep account, though. Not -- it

7 didn't go into stocks. Actually, it did

8 temporarily. I bought a couple of

9 stocks short-term that I sold.

10 Used that money from the sale of

11 the house to buy my house in ~~Mentor~~. And

12 there were other funds that were left

13 over, after I bought the house in ~~Mentor~~

14 that went to the fencing and the barn.

15 Q Any other purchases?

16 A I haven't bought any horses

17 lately. Over what time? Like, when we

18 were married? When we were married, I

19 spent money out of that account.

20 Q Okay. How much did you spend

21 out of that account?

22 A Out of that account while we

23 were -- I don't know. You've got the

24 statements. Quite a lot.

25 Q What would it be monthly?

1 A 6,000 a month, probably, when we  
2 were married.

3 Q And you all would just live on  
4 it?

5 A Yeah.

6 Q Did it purchase any other  
7 assets?

8 A No.

9 Q Has the money been put into any  
10 other type of account?

11 A No. You have an absolute record  
12 of all the accounts I had then and I  
13 have now.

14 Q Okay.

15 A I have a United Community  
16 account that's got \$5,000 in it that I  
17 opened when I moved to Menlo. I'm not  
18 sure if that's included in your  
19 documents, but it's just a minimal  
20 amount.

21 Q Is that a checking account?

22 A Uh-huh. (Affirmative).

23 MR. BATES: I don't believe  
24 those have been provided.

25 MS. DUKE: We'll supplement if

1 checking account attached to that  
2 brokerage account that has the same --  
3 the same account number. So it...

4 Q And you have a debit card with  
5 that as well?

6 A I do not have an active debit  
7 card, no.

8 Q So you have a credit card? You  
9 have credit cards?

10 A Yes.

11 Q And that's the ones that you use  
12 to live on?

13 A I don't purchase anything with a  
14 debit card. I write checks. I wrote  
15 checks for, like, housing-related  
16 things. But I live on my credit cards,  
17 and I pay them off monthly.

18 Q Okay.

19 A Because one day I might get to  
20 travel on all those points.

21 Q And I believe the main one is  
22 the Discover or Capital One?

23 A Capital One would be the one I  
24 use the most.

25 Q And you still use Capital One?

1 they haven't.

2 MR. BATES: Okay.

3 MS. DUKE: It may have been  
4 before we were given this.

5 A Yeah. I think it was after the  
6 request for documents. But I don't know  
7 if I've supplemented that, because I  
8 just put an opening amount in of [redacted]  
9 It's just sitting there.

10 BY MR. BATES:

11 Q But is that the account you live  
12 on?

13 A No.

14 Q What account do you --

15 A No, I live on the [redacted] account  
16 really.

17 Q The brokerage?

18 A My paychecks are deposited there  
19 as well.

20 Q Into the [redacted]?

21 A Yes.

22 Q You're the first person I've  
23 ever known to live on a brokerage  
24 account.

25 A Well, it's not -- So, there's a

1 A Uh-huh. (Affirmative).

2 Q Any objection to supplementing  
3 that forward from the March 13th, 2024  
4 date?

5 A What, my Capital One statements?

6 Q Correct.

7 A No.

8 Q Do you still use the Barclays  
9 card?

10 A Not really.

11 Q Amex, American Express.

12 A Not really.

13 Q Discover?

14 A I don't even -- I don't use that  
15 one at all. I mean, I got a replacement  
16 card because that one expired, but I  
17 haven't even activated it.

18 Q Some of these purchases are  
19 personal. Some of them you write off  
20 under the Schedule F?

21 A Yes.

22 Q That was going on prior to  
23 separation?

24 A Uh-huh. (Affirmative).

25 Q Is that a yes?

1       **A**    Yes. Sorry.

2       **Q**    Okay.

3       **A**    The vast majority of my

4    **purchases are related to keeping the**

5    **animals fed and alive, to be honest.**

6       **Q**    How long did you and Mr. Kennedy

7    date?

8       **A**    Before we got married?

9       **Q**    Yes.

10      **A**    A year, about a year.

11      **Q**    And he was living in the

12    McMinnville area initially?

13      **A**    Yes.

14      **Q**    When did he move into your home

15    in Bon Aqua?

16      **A**    December of '21.

17      **Q**    Prior to the marriage?

18      **A**    Yes.

19      **Q**    Were there discussions about

20    this between the two of you?

21      **A**    About what?

22      **Q**    Him moving into your home?

23      **A**    Yes.

24      **Q**    Describe those discussions,

25    please.

1       **A**    He said we need to live

2    **together. I don't like driving back and**

3    **forth. I don't like you driving back**

4    **and forth. You can't move into my**

5    **house. So I -- I mean, I've got a key,**

6    **it's okay if I probably move into your**

7    **place, right? What are we going to do**

8    **with my stuff? Yeah, those were the**

9    **discussions.**

10      **Q**    How soon after moving in did

11    Mr. Kennedy sell his home?

12      **A**    He sold it before he moved in.

13      **Q**    Were there discussions about you

14    telling him, why don't you sell your

15    home and you can move in with me? Was

16    that communicated to him?

17      **A**    Yeah. I mean, I'm sure it was

18    **communicated as an option.**

19      **Q**    Did he ever ask for his name to

20    be put on the deed in the Bon Aqua home?

21      **A**    Yes.

22      **Q**    What did you tell him?

23      **A**    No.

24      **Q**    Why did you tell him no?

25      **A**    Because my children are the

1       beneficiaries of my estate largely.

2       **What we had discussed was buying a house**

3       **for us. That would be our house. The**

4       **challenge was, he had \$250,000 from his**

5       **home. And I was going to make more from**

6       **that -- more than that from my home.**

7            And so my suggestion was, hey,

8       we'll find a house in the \$500,000 range

9       so we don't have to have a mortgage. Or

10      if we find a house that's more

11      expensive, I'll put 250 in, you'll put

12      250 in, and we'll mortgage the

13      remainder. And then that money will go

14      into an investment account for my

15      children's benefit when I die. And then

16      anything we grew as a couple from there

17      would be "our" money.

18      **Q**    When was that discussion?

19      **A**    Oh, we had -- it was ongoing.

20      **Q**    Both before and after the sale

21    of the home?

22      **A**    Both before and after -- or

23    **actually not -- not after. But both**

24    **before it was listed and after it was**

25    **listed. And we had a very in-depth**

1       **conversation about that with Jason**

2    **[redacted] who was a therapist we saw.**

3       **Q**    After the marriage?

4       **A**    Jason Hancock. Yes.

5       **Q**    Okay. So you told him, you told

6    Mr. Kennedy, you sell your home, we'll

7    sell this Bon Aqua home, we'll buy a

8    home, we'll equally contribute to its

9    purchase.

10      **A**    Not exactly like that. I said,

11    **you sell this, and then we'll talk about**

12    **what the timeline is. We actually had**

13    **discussed the timeline of living in Bon**

14    **Aqua for five years and then selling,**

15    **because the market was so volatile**

16    **after -- like, right after he sold his**

17    **home, the perfect time to sell a home**

18    **was pretty much winding down.**

19            So we had discussed a five-year

20    **timeline, and I had given him investment**

21    **plans. I had given him, like, a**

22    **reserved risk-averse investment plan for**

23    **his money. And I'd given him a risky**

24    **investment plan for his money. He never**

25    **did either of them.**

1 In the one scenario, he would  
2 have, at the time we separated, had  
3 700,000. If he had followed my more  
4 risky scenario at the time we separated,  
5 he would have had 1.6 million, if he had  
6 invested like I told him. But we -- we  
7 could have -- we had a lot of  
8 discussions.

9 Q You said 1.6 million. Are you  
10 saying right now his 200-and --

11 A Not right now.

12 Q No.

13 A When we separated, at the time  
14 we separated, I calculated it.  
15 Actually, at the time that I did that  
16 inventory for you, I pulled back up the  
17 investment advice I had given him and  
18 ran those numbers, because I'm a numbers  
19 girl. And it would have been  
20 1.7 million if he had invested the way I  
21 told him to.

22 Q Was that in writing?

23 A No.

24 Q What did you pull back up?

25 A I -- I remembered what I told

1 listed his home. Correct?

2 A No, actually it wasn't, it was  
3 discussed after we were both living in  
4 the Bon Aqua house.

5 Q Okay. So what was discussed  
6 before? Because your prior testimony  
7 was this was before listing. So what  
8 was discussed before?

9 A Just general, okay, move your  
10 stuff, move in here, and we've got to  
11 figure out where to put your stuff. His  
12 washer and dryer ended up in the living  
13 room forever. I ended up renting pods  
14 to store his things.

15 Q Did you put any conditions on  
16 his ability to move in?

17 A No.

18 Q And this was prior to your  
19 marriage?

20 A Yes.

21 Q All right. Did Mr. Kennedy help  
22 with running of the farm?

23 A Yes.

24 Q What all did he do?

25 A He bushhugged sometimes. He cut

1 him. I -- I told him, in one -- in one  
2 breath to invest in an ETF called QQQ,  
3 which is conservative. It grows between  
4 10 and 22 percent per annum, basically.  
5 And then the other strategy was Nvidia,  
6 MercadoLibre and Shopify.

7 Q Was this an email?

8 A No, we were just talking about  
9 it.

10 Q Okay.

11 A He said -- basically what he  
12 said was, I don't know how to do it. I  
13 need you to do it for me. And I was  
14 like, that is your money. I'm not  
15 putting my hands on it. I'm giving you  
16 options. You can do it or not do it,  
17 either one.

18 We kept all of our funds  
19 separate. His paychecks went into his  
20 Ascend account; my paychecks went into  
21 my account.

22 Q The five-year plan, what I'm  
23 calling the five-year plan, --

24 A Yeah.

25 Q -- was discussed before he

1 the grass and did some weedeating. I  
2 would disagree that he did much feeding  
3 of the animals. I could probably count  
4 on two hands how many times he fed the  
5 animals.

6 Q What else?

7 A General maintenance.

8 Q Describe that term, please.

9 A He did -- he built a small pen  
10 for the chickens, ducks and geese. Used  
11 T-posts and put in some fencing. He put  
12 in an automatic coop door on the chicken  
13 coop.

14 He did replace two toilets in  
15 the house. One before marriage, one  
16 after marriage. He replaced the stove  
17 that I broke, and he replaced the  
18 kitchen sink. But, quite frankly, I  
19 didn't want him to replace the kitchen  
20 sink, but he wanted to.

21 Q Anything else?

22 A That's largely it.

23 Q This was during the time he was  
24 receiving disability payments from a  
25 private insurance?

1 **A** Some of it was. Some of it was  
2 before.

3 **Q** Okay. Did you notice changes in  
4 his health related to why he was on  
5 disability from the private insurance?

6 **A** No.

7 **Q** Did you think he was defrauding  
8 the insurance company?

9 **A** I felt like it was a gray area.  
10 Long Covid was something new. It was  
11 hard to define.

12 **Q** Do you believe in Long Covid?

13 **A** I still don't believe it's --  
14 it's well defined. So, I mean, do I  
15 believe it exists? Yes. Do I  
16 necessarily believe he has it? No.

17 **Q** What makes you say that?

18 **A** Over the course of time, he  
19 evidenced to me that he believed that  
20 you pay into insurance to use it. I  
21 believe that you pay into insurance to  
22 not use it. It's to ensure that you're  
23 okay in the event of a disaster. He --  
24 his statement was, I paid -- they've  
25 made me pay into this for years. Now

1 it's going to pay me.

2 **Q** Okay. When you were -- strike  
3 that.

4 Was there increased farming  
5 activity once Mr. Kennedy moved to the  
6 home?

7 **A** No.

8 **Q** The activity stayed the same, he  
9 was just there to help out?

10 **A** Yes.

11 **Q** And did you all discuss, hey, if  
12 you move here, I do run a farm here,  
13 you're going to have to help out?

14 **A** No.

15 **Q** How many hours a week do you  
16 work this farm, in Tennessee before you  
17 moved?

18 **A** It depended on the week. I've  
19 got a pretty flexible job. Sometimes I  
20 support international clients, and so I  
21 can work before the traditional workday  
22 starts, and then I can do farm work.

23 When he moved in, my farming  
24 activity actually slowed down quite a  
25 bit. I wasn't able to ride my horses as

1 much. So it actually slowed down.

2 **Q** Did you tell Mr. Kennedy that  
3 you were a convicted felon before you  
4 got his marriage?

5 **A** Yeah.

6 **Q** And your discovery answer didn't  
7 exactly clarify that you were convicted  
8 of a felony. Would you agree with that?

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

10 **Q** Question 1, (As Read) Have you  
11 ever been arrested? If so, please state  
12 the nature of the offense, the county in  
13 which the arrest warrant was issued, the  
14 day of the trial and the outcome.  
15 (Reading ends)

16 **A** Uh-huh. (Affirmative).

17 **Q** Your answer was, (As Read) I was  
18 charged with assault in 2008, in  
19 Arizona. I pled guilty, and the charges  
20 have been discharged. (Reading ends)

21 **A** Yeah.

22 **Q** What do you mean by discharged?  
23 Have they been expunged?

24 **A** I completed the requirements of  
25 my punishment.

1 **Q** Okay.

2 **A** That's actually what discharge  
3 means in a -- in the legal language.  
4 I'm fully discharged from any --

5 **Q** Are you able to vote?

6 **A** Yeah.

7 **Q** Are you registered?

8 **A** Yeah.

9 **Q** Where are you registered?

10 **A** Georgia.

11 **Q** Were you registered in  
12 Tennessee?

13 **A** Yes -- no, no, I was not  
14 registered in Tennessee.

15 **Q** Okay.

16 **A** But I am registered in Georgia.

17 **Q** When did you register in  
18 Georgia?

19 **A** When I moved there.

20 **Q** Were you registered to vote in  
21 Arizona?

22 **A** Yes.

23 **Q** After the 2008 --

24 **A** No, no, I wasn't.

25 **Q** Did you ever have your rights

1 restored in an official proceeding?  
 2 **A Yeah.**  
 3 **Q** When were your rights restored?  
 4 **A 2023.**  
 5 **Q** Okay. So while -- during the  
 6 marriage?  
 7 **A I misspoke, it was 2020.**  
 8 **Q** Okay. In Tennessee?  
 9 **A** In Arizona, which is where the  
 10 charges are.  
 11 **Q** Do you have paperwork still  
 12 related to the restoration?  
 13 **A Yeah.**  
 14 **Q** But for that, would you be  
 15 unable to own a firearm?  
 16 **A But for that -- yes.**  
 17 **Q** Unless you restored your rights,  
 18 you wouldn't be able to have a firearm?  
 19 **A Correct.**  
 20 **Q** Was the restoration specifically  
 21 to allow you to have a firearm?  
 22 **A No.**  
 23 **Q** And you were --  
 24 **A** It was more important to me that  
 25 I vote. I'm a horrendous shot with a

1 gun. I don't like them. I don't have  
 2 them. I don't appreciate them in any  
 3 way.  
 4 **Q** Did you vote in the 2020  
 5 election, presidential?  
 6 **A No.**  
 7 **Q** Did you vote in the 2024  
 8 presidential election?  
 9 **A Yeah.**  
 10 **Q** Are you in Marjorie Taylor  
 11 Greene's district?  
 12 **A Don't make fun of me. Yes, I**  
 13 **am.**  
 14 **MS. DUKE:** I'm going to object  
 15 to form.  
 16 **A Yes, I am in Marjorie -- and I**  
 17 **had a Shawn Harris sign in my front**  
 18 **yard, and I have one again. Marjorie**  
 19 **Taylor Greene...**  
 20 **MS. DUKE:** I think we're all  
 21 on the same page on that one.  
 22 **BY MR. BATES:**  
 23 **Q** All right. Was there any  
 24 communications prior to the sale about  
 25 him -- Mr. Kennedy moving in, you and

1 Mr. Kennedy purchasing a home together,  
 2 was any of that in either text messages,  
 3 emails, or recorded documentation?  
 4 **A I need you to explain, because I**  
 5 **didn't -- I didn't follow you all the**  
 6 **way.**  
 7 **MS. DUKE:** Yeah, that was kind  
 8 of a combo question.  
 9 **BY MR. BATES:**  
 10 **Q** Big umbrella.  
 11 **A Yeah.**  
 12 **Q** Discussions about him moving  
 13 into your home, discussions about how to  
 14 manage the funds of his money,  
 15 discussions about purchasing a home?  
 16 **A There were not. And as it**  
 17 **turned out, that was really problematic.**  
 18 **Because I believed that those -- the**  
 19 **funds from the sale of his house were**  
 20 **his funds to deal with as he wanted.**  
 21 **Now, there was some expectation**  
 22 **that if we were going to sell my house**  
 23 **and buy another house -- on my part, if**  
 24 **we were going to sell my house and buy**  
 25 **another house together, that he would**

1 contribute.  
 2 **He, on the other hand, had a**  
 3 **completely separate expectation, that I**  
 4 **would sell my house and use only my**  
 5 **funds to buy a new place that would have**  
 6 **his name on the deed. And I took**  
 7 **incredible offense to that. It felt to**  
 8 **me like a money grab and improper.**  
 9 **Not only that, he would send me**  
 10 **houses to look at that were over a**  
 11 **million dollars in cost. And I was**  
 12 **like, I'm -- I'm sending him, if you**  
 13 **look through the text messages, the**  
 14 **houses I was sending him to look at were**  
 15 **between 5- and 600,000.**  
 16 **Q** And the homes you all were  
 17 looking at was in what area?  
 18 **A Largely in Ocala.**  
 19 **Q** Florida?  
 20 **A -- Florida, uh-huh.**  
 21 **(Affirmative).**  
 22 **Q** Have you been to their horse --  
 23 **A Yes. That is mecca. That is**  
 24 **mecca. I started jumping one of my**  
 25 **horses over 4.2 jumps, and I was like,**

1 **we can get there, we can get there.**  
 2 **Maybe next year.**  
 3 **Q** Did you all travel to Florida  
 4 together to look at homes?  
 5 **A** **We did.**  
 6 **Q** And this -- what timeframe was  
 7 this?  
 8 **A** **I think it was, like, September**  
 9 **of 2023.**  
 10 **Q** And this was in conjunction with  
 11 the plan to each contribute -- in your  
 12 opinion, each contribute equally,  
 13 mortgage the rest if need be?  
 14 **A** **That was -- that was my**  
 15 **expectation, but it was never a plan**  
 16 **that coalesced. And so while we found a**  
 17 **few houses we liked down there, I knew**  
 18 **that wasn't going to work.**  
 19 **Q** All right. Let me ask you this:  
 20 We know in September 2023 you all are  
 21 looking for homes in furtherance of this  
 22 plan, right?  
 23 **A** **Yes.**  
 24 **Q** When did the discussions of that  
 25 plan begin? Prior to Mr. Kennedy

1 **Q** Did you tell him that prior to  
 2 you listing the home?  
 3 **A** **You know, I told him that in**  
 4 **response to -- he had asked me if he**  
 5 **could do something. I was like, this is**  
 6 **your house, do what you want.**  
 7 **Q** But the timing of it. Did you  
 8 tell him before you listed it for sale?  
 9 **A** **Probably, yeah.**  
 10 **Q** Did you discuss with him listing  
 11 the house for sale?  
 12 **A** **Yes.**  
 13 **Q** Did he agree to it?  
 14 **A** **Yes.**  
 15 **Q** And that was -- Would you agree  
 16 with this, it was in furtherance of the  
 17 plan to you all equally contribute to a  
 18 home, a new purchase?  
 19 **A** **Right.**  
 20 **Q** You were going to take the  
 21 balance of the proceeds preserved for  
 22 your children?  
 23 **A** **Correct. I mean, obviously it**  
 24 **was going to stay invested. So, you**  
 25 **know, continue to grow it.**

1 selling his home?  
 2 **A** **No.**  
 3 **Q** When did it again?  
 4 **A** **When I listed my home. So that**  
 5 **would have been July 2023, I believe.**  
 6 **Q** When did you tell Mr. Kennedy  
 7 that you were not going to live in the  
 8 Bon Aqua home forever?  
 9 **A** **Probably when I actually listed**  
 10 **the house. He claimed that the rage**  
 11 **episodes he was having were related to**  
 12 **the fact that he didn't feel like that**  
 13 **was his home, and he didn't feel**  
 14 **comfortable. And I was like -- I was**  
 15 **ready to try anything to maintain and**  
 16 **salvage the marriage, but...**  
 17 **Q** You told him, this is your  
 18 house?  
 19 **A** **I told him that was -- Yeah.**  
 20 **Q** What did you mean by that?  
 21 **A** **You live here. You can do what**  
 22 **you want while you're here. You don't**  
 23 **have to ask me if you can go somewhere.**  
 24 **You don't have to ask me if you can make**  
 25 **something, you know.**

1 **Q** But the home was going to be  
 2 something you and Mr. Kennedy had?  
 3 **A** **Right, a joint asset.**  
 4 **Q** At the time of July 2023, on a  
 5 scale of one to ten, how would you  
 6 assess your marriage? Ten being great,  
 7 zero being bad.  
 8 **MS. DUKE:** I'm going to object  
 9 to the form, but you go ahead and  
 10 answer.  
 11 **A** **Two or three.**  
 12 **BY MR. BATES:**  
 13 **Q** Okay. At the time of the  
 14 marriage, what was your relationship,  
 15 one of ten, with Mr. Kennedy?  
 16 **A** **Eight.**  
 17 **Q** During the marriage, did  
 18 Mr. Kennedy purchase things that  
 19 benefited the household?  
 20 **A** **Food.**  
 21 **Q** Anything else?  
 22 **A** **I -- I don't know what you're**  
 23 **referring to. I'm sure there was some.**  
 24 **I mean, I'm sure he did, yeah.**  
 25

1 Q Did he buy assets?  
 2 A No.  
 3 Q Personal property? Tractors?  
 4 A No.  
 5 Q Buy any mowers?  
 6 A No.  
 7 Q Did he bring any of these things  
 8 into the marriage?  
 9 A He brought a riding mower into  
 10 the marriage that was in disarray when  
 11 he brought it in.  
 12 Q The Scag?  
 13 A Yeah.  
 14 Q And did you sell the Scag?  
 15 A It went with the house.  
 16 Q That was a condition on the  
 17 sale?  
 18 A Yeah.  
 19 Q And how much -- Do you have any  
 20 idea what the Scag was worth when you  
 21 sold it?  
 22 A It was -- it was worth about  
 23 \$3,000. That thing smoked, it leaked  
 24 oil, it leaked fuel, it leaked  
 25 everything. Even when he was in

1 McMinnville, he was always underneath  
 2 that thing.  
 3 Q All right. When did you receive  
 4 the offer to purchase on the Bon Aqua  
 5 homes?  
 6 A I would have to look at the  
 7 records, I don't remember.  
 8 Q What closing agent did you use?  
 9 A Music Title, I think. I've got  
 10 it with me, if you need me to look it  
 11 up.  
 12 Q I'm not going to pass that up.  
 13 MS. DUKE: I don't mind for  
 14 you to get it out either. Just  
 15 because she's looking for that  
 16 doesn't mean you get to inspect any  
 17 of the other stuff. You've asked  
 18 her for something specific.  
 19 Otherwise, we won't let that  
 20 happen.  
 21 MR. BATES: My dad always used  
 22 to -- This is off the record.  
 23 (Off-the-record discussion, after which  
 24 a brief recess was taken.)  
 25

1 A That's the closing for the Bon  
 2 Aqua home, closing documentation.  
 3 BY MR. BATES:  
 4 Q (Counsel examines documents.)  
 5 And so the purchase price was a million  
 6 dollars?  
 7 A Yes.  
 8 Q And the offer was made when? It  
 9 looks like it sold in February of 2024.  
 10 A So that would have been -- I  
 11 think it was actually -- we ended up  
 12 doing a 45-day closing, I'm pretty sure.  
 13 So it was either December or January.  
 14 MR. BATES: So, you all can  
 15 just send that to me, we'll mark it  
 16 as a late -- You'll send it to me,  
 17 I'll send it to the court reporter  
 18 to be marked as a late-filed  
 19 exhibit.  
 20 (Closing documents for Bon Aqua  
 21 home were requested to be  
 22 produced and later marked as  
 23 Exhibit 2.)  
 24 A Yeah. So we closed in February.  
 25 But I had a pregnant horse at the time,

1 didn't want to move her, so we leased it  
 2 back for two months.  
 3 BY MR. BATES:  
 4 Q Correct. So there was some  
 5 offer, then, at the end of 2023 or early  
 6 2024. Leased back, to leave in April of  
 7 2024?  
 8 A Correct.  
 9 Q When do you think your marriage  
 10 ended in terms of "I'm going to get a  
 11 divorce"?  
 12 A I think I -- you know what? I  
 13 contacted Hilary in May of 2023. May of  
 14 2023.  
 15 Q You don't have to tell me what  
 16 you talked about. But was it for the  
 17 purpose of a divorce?  
 18 A Yes, yes.  
 19 Q And from that time forward, did  
 20 you ever change your intent to be  
 21 divorced?  
 22 A You know, we went to counseling.  
 23 I paid for a counselor every week for,  
 24 like, three months. But I think it  
 25 became clear to me in October of 2023,

1 **there was -- there was no return.**  
 2 **Q** Did you tell Mr. Kennedy that?  
 3 **A** **Yes.**  
 4 **Q** When did you tell him that?  
 5 **A** **In October.**  
 6 **Q** Did you all go to Diamond  
 7 National Park after that?  
 8 **A** **Yes.**  
 9 **Q** And did you all continue to have  
 10 sexual relations?  
 11 **A** **Yes.**  
 12 **Q** Do you agree that sends a mixed  
 13 message?  
 14 **A** **Did you listen to those**  
 15 **recordings I sent you?**  
 16 **Q** I did.  
 17 **A** **Yeah, yeah. I said that. I**  
 18 **said exactly that. It sends a mixed**  
 19 **message. We cannot do that.**  
 20 **Q** But you did it, right?  
 21 **A** **Right. I -- I felt like in**  
 22 **October of 2023, there probably wasn't**  
 23 **going to -- we weren't going to be able**  
 24 **to come back. But I still did continue**  
 25 **to make efforts, because I did not want**

1 **to be divorced.**  
 2 **Q** You sent them on YouTube, and it  
 3 looks like you have a YouTube public  
 4 channel. Are the videos that I received  
 5 last night --  
 6 **A** **Those were private. They're**  
 7 **totally private.**  
 8 **Q** Okay.  
 9 **A** **If you don't have the link, you**  
 10 **can't see them.**  
 11 **Q** Okay. And do you have any  
 12 intent to publish them?  
 13 **MS. DUKE:** No, and we can  
 14 enter an agreement on that.  
 15 Absolutely not.  
 16 **THE WITNESS:** Or I can just  
 17 delete them, delete them easily.  
 18 **MR. BATES:** Don't delete them.  
 19 **MS. DUKE:** She could not send  
 20 them by email because they're too  
 21 long.  
 22 **MR. BATES:** That's fine.  
 23 **BY MR. BATES:**  
 24 **Q** When's the last time you had sex  
 25 with Mr. Kennedy?

1 **A** **March, maybe the 22nd, or**  
 2 **something like that.**  
 3 **Q** Is that when the -- That was  
 4 before the police were called?  
 5 **A** **Yes.**  
 6 **Q** There was a night the police  
 7 were called?  
 8 **A** **There was a day the police were**  
 9 **called.**  
 10 **Q** A day?  
 11 **A** **Yeah.**  
 12 **Q** And that's the date you left  
 13 with the Subaru -- I'm sorry, you left  
 14 with the truck?  
 15 **A** **Correct. It's actually a funny**  
 16 **story.**  
 17 **Q** Let's hear it.  
 18 **A** **All right. So he -- I had told**  
 19 **him that he was not to touch me. I was**  
 20 **like, you're not touching me. And he**  
 21 **said, fine, I'm calling my son.**  
 22 **He calls his son, Christopher**  
 23 **And I see him going towards the truck,**  
 24 **and I realize, I've got this pregnant**  
 25 **mare who's going to burst any minute.**

1 **He cannot take that truck. So I got my**  
 2 **happy little behind in the truck and**  
 3 **headed towards Hickman County Sheriff's**  
 4 **Department.**  
 5 **As I'm driving down the road, I**  
 6 **see a Hickman County Sheriff pulled over**  
 7 **in the church parking lot, right off of**  
 8 **48 there. And so I pulled over and**  
 9 **talked to him. And I said, hey, here's**  
 10 **what's going on.**  
 11 **And as I'm talking to him, his**  
 12 **name came across -- Matthew Kennedy came**  
 13 **over the radio. The sheriff didn't**  
 14 **catch it, I did. I heard it. And I**  
 15 **said, hey, that's -- that's my husband**  
 16 **that just called.**  
 17 **And so he calls into dispatch**  
 18 **and asks them. And he had reported a**  
 19 **stolen vehicle. And the sheriff said,**  
 20 **okay -- you know, got the details. And**  
 21 **he said, can you give me the title? And**  
 22 **I went back to the truck. I said, I can**  
 23 **get you the registration, which had both**  
 24 **of our names on it. And he said, you**  
 25 **are fine to go about your business.**

1 This is as much your truck as it is his.  
2 It's as much his as it is -- as it is  
3 yours. Possession is nine-tenths of the  
4 law. He said, so do with it as you  
5 will. And I said, okay, thanks.

6 So I went to a friend of mine's  
7 at that point, because he had called and  
8 reported the car stolen. He wanted me  
9 yanked out, face down on the asphalt.  
10 And so, I went down the street to a  
11 friend of mine's and hung out there for  
12 a little bit before I went back home. A  
13 few minutes later, she dropped me off.

14 Yeah. So that was the  
15 interesting police call. I didn't call  
16 them. He did.

17 Q Why didn't you just take the  
18 Subaru?

19 A Because it won't pull a horse  
20 trailer.

21 Q I see.

22 A And that mare weighed probably  
23 2,300 pounds at the time.

24 Q When did you make an offer on  
25 the Georgia home?

1 MS. DUKE: Doug, can you  
2 instruct your client to stop  
3 shaking his head and doing all  
4 kinds of stuff when she's trying to  
5 answer questions?

6 MR. BATES: Well, your client  
7 did a lot of that also. But just  
8 try to limit the --

9 A But it was -- it was in -- It  
10 was in October. I said, you know, we  
11 need to start making plans of what we're  
12 each going to do.

13 BY MR. BATES:

14 Q Okay. And at that point, the  
15 home had already been listed?

16 A Uh-huh. (Affirmative).

17 Q Okay.

18 (Audio Recording Played.)

19 A On YouTube, just so you know --

20 Q This isn't the YouTube. This  
21 is --

22 A Oh.

23 Q This is the recording we sent  
24 you.

25 A Oh, okay.

1 A March 20th, I think.

2 Q Okay. And was this before or  
3 after this day of police calling?

4 A It was, like, four days before.

5 Q Okay. And had you --

6 A I literally saw it one day and  
7 made an offer the next morning.

8 Q Okay. And you agreed that this  
9 was in contrast to the plan of, you sell  
10 the home, each of you contribute  
11 one-half to the new home?

12 A Divorce was also in contrast to  
13 that plan, so, yes.

14 Q When did you make a  
15 determination you were going to file for  
16 divorce?

17 A October.

18 Q Did you communicate to  
19 Mr. Kennedy that the plan to sell the  
20 home and purchase jointly a home was  
21 over?

22 A Yes.

23 Q When?

24 A It may have even been on that  
25 recording I sent you from October.

1 Q And you just asked on the  
2 recording, I believe, if you'll confirm,  
3 "Are you recording me?" And I can play  
4 it back if need be. Okay.

5 (Audio Recording Played.)

6 A So when was this taken? In  
7 March?

8 Q Per your attorney, you can't ask  
9 me questions.

10 A Oh.

11 (Audio Recording Continues)

12 Q Did you hear that?

13 A No. Oh, "Are you recording?"  
14 Yes.

15 Q Is that your voice?

16 A Yeah, that's me.

17 (Audio Recording Continues)

18 MR. BATES: I'm going to put  
19 this on a zipdrive and make it an  
20 exhibit.

21 (Audio recording to be provided  
22 and later marked as Late-filed  
23 Exhibit 3.)

24 (Audio Recording Continues)

25

1 **BY MR. BATES:**

2 **Q** Do you remember when this was?

3 **A** I -- no. I vaguely remember.

4 **It seems like I was sitting in a rocking**  
5 **chair.**

6 **Q** Okay. Was it before or after  
7 the home in Bon Aqua had been listed for  
8 sale?

9 **A** I would guess after.

10 **Q** Was it before the offer to  
11 purchase had come, been received?

12 **A** I don't know. I don't know.

13 **Q** I'm going to fast forward. I  
14 stopped at minute 1:21. I'm going to  
15 fast forward to minute 15.

16 (Audio Recording Continues)

17 **Q** I'll pause it at 15:28. Why did  
18 you not have a relationship with your  
19 family at this time?

20 **A** Because he assaulted my daughter  
21 in the garage, and my son was there.

22 **Q** When -- when did he do that?

23 **A** April of 2023.

24 **Q** Prior to the effort to find a  
25 home together?

1 promised me if I sold my home, we  
2 wouldn't be in this." At no point did  
3 you correct him, did you?

4 **A** During that recording? No. But  
5 you heard the tenor of that recording.  
6 When I corrected him, he was like, we're  
7 not going to be reactive. There were  
8 several other times that he had said  
9 that. And I was like, no, I didn't  
10 promise you that, nobody makes that  
11 promise.

12 **Q** But you knew you were on the  
13 recording at this recording, correct?

14 **A** Yes.

15 **MS. DUKE:** Objection to form.

16 **BY MR. BATES:**

17 **Q** Well, early on in this same  
18 recording, you said, are you recording  
19 me, and he said yes.

20 **A** Yeah.

21 **Q** All right. Knowing you were on  
22 the recording, he says something that  
23 you disagree with in terms of the  
24 factual statement, and you never  
25 corrected him?

1 **A** Yes.

2 **Q** And when you say "assault," what  
3 do you mean?

4 **A** Oh, he sent her a stupid text  
5 message, and then she came out to the  
6 garage and just said, could you please  
7 stop sending me these kind of messages?  
8 And he got all big and blustery and in  
9 her face and in my face. And we were  
10 both fearful that he was going to be  
11 physically violent.

12 **Q** Was he ever physically violent  
13 to you?

14 **A** He threw bottles at me. He  
15 threw things at me.

16 **Q** Did he ever hit you?

17 **A** No.

18 **Q** Did he ever physically assault  
19 any of your children?

20 **A** No.

21 **Q** Okay.

22 (Audio Continues Playing.)

23 **Q** All right. I'm stopping at  
24 18:40.

25 You heard Mr. Kennedy say, "You

1 **A** If you rewind that to the  
2 beginning of what you were playing,  
3 you'll hear where I did correct him one  
4 time, and he said, whoa, whoa, we're not  
5 going to be reactive. So no, no, I  
6 didn't correct him in that instance.

7 **Q** Okay.

8 **A** It seems to be the case that  
9 when he says something, that means it's  
10 true, whether it's true or not. That  
11 was part of the problem that we had  
12 throughout our relationship. He  
13 believed that if he said it, it made it  
14 true, whether it was true or not.

15 **Q** But then your next statement  
16 was, what's different than in July of  
17 2023.

18 **A** In June.

19 **Q** June is when you all were in  
20 counseling?

21 **A** Uh-huh. (Affirmative).

22 **Q** Correct?

23 **A** Correct.

24 **Q** That was the line you drew?

25 **A** The line I drew?

1 Q Right. Well, we were in  
 2 counseling in June.  
 3 A Yeah, that's not -- that wasn't  
 4 directly confrontational. I was asking  
 5 him a question, what's different now  
 6 than was in June.  
 7 Q Then you went to Georgia. And  
 8 would you agree with me that you had  
 9 Mr. Kennedy help you move? Correct?  
 10 A He -- he did help at the very  
 11 end, yes.  
 12 Q And he brought things down to  
 13 you?  
 14 A Uh-huh. (Affirmative).  
 15 Q Is that a yes?  
 16 A Yes.  
 17 Q And were you still relying on  
 18 him to help you?  
 19 A No. No. At that point, the  
 20 children had been helping me move.  
 21 Neighbors that helped me moved -- move.  
 22 I had actually tapped out my resources.  
 23 The kids didn't have any more time off,  
 24 and I was up against a wire. And he  
 25 said, I'll come help you.

1 Q Were you still telling him in  
 2 April of 2024 that you loved him?  
 3 A I would -- yeah, I'm sure I was.  
 4 Q Still making him think that you  
 5 all would --  
 6 A No.  
 7 Q Hold on -- that your marriage  
 8 was not over?  
 9 A No.  
 10 Q Well, he's moving -- helping you  
 11 move, and you're telling him that you  
 12 appreciate him and love him. Right?  
 13 A Yes.  
 14 Q Telling him where to come to  
 15 your home?  
 16 A Yes.  
 17 Q Had he been served, to your  
 18 knowledge, with the divorce complaint?  
 19 A Yes.  
 20 Q Now, when he shows up, where did  
 21 he spend the night?  
 22 A He stayed there.  
 23 Q And were you all intimate?  
 24 A No.  
 25 Q You were telling him you loved

1 him, though?  
 2 A I still told him in July, this  
 3 past July, that I loved him.  
 4 Q Was an order of reconciliation  
 5 discussed between you and Mr. Kennedy?  
 6 A He discussed it a lot, yes.  
 7 Q Did you respond?  
 8 A I said your -- your attorney can  
 9 do whatever he wants to do, but that's  
 10 not going to happen.  
 11 Q And you had security cameras in  
 12 place, correct?  
 13 A At my ~~Went to~~ house?  
 14 Q Yes.  
 15 A Yes.  
 16 Q Now, when you -- Let me ask  
 17 this: How many nights did Mr. Kennedy  
 18 stay there?  
 19 A One. And not even -- yeah, one.  
 20 Q Okay. I'm going to go through  
 21 some property questions.  
 22 A Okay.  
 23 Q The 2022 Ram Limited Longhorn  
 24 mega cab, --  
 25 A Yes.

1 Q -- that was purchased during the  
 2 marriage?  
 3 A It was purchased one month after  
 4 we were married, yes.  
 5 Q And where is it now?  
 6 A In my garage.  
 7 Q How much do you think it's  
 8 worth?  
 9 A \$57,000. Actually, I've got the  
 10 KBB printout for it. It's worth between  
 11 57 and 63, I believe.  
 12 Q And you want it?  
 13 A Huh?  
 14 Q You want to keep the vehicle?  
 15 At the end of the divorce, you want to  
 16 keep it?  
 17 A I would like to...  
 18 MS. DUKE: That's fine.  
 19 A What I would like to do,  
 20 actually, today, if your client is  
 21 willing, is to have him sign the title  
 22 over. And his son, ~~Went to~~, would like to  
 23 buy that car -- that truck for \$57,000.  
 24 BY MR. BATES:  
 25 Q The 2018 Honda Pioneer. Is that

1 yours?

2 **A It's gone.**

3 **Q** What happened to it?

4 **A The engine, essentially, just**

5 **blew. I was told that the oil was being**

6 **changed on it. And the week after I**

7 **moved to [redacted] -- During the course of**

8 **the marriage, I was told that he was**

9 **changing the oil on it. The week after**

10 **I moved to [redacted], I was unpacking boxes**

11 **and unpacked all three of the oil change**

12 **kits that I had bought over time, and**

13 **realized that I needed to change the**

14 **oil. It was full of shavings, and so I**

15 **traded it.**

16 **Q** What did you trade for?

17 **A A no-name dump bed quad,**

18 **side-by-side.**

19 **Q** 2021 John Deere 4052. You still

20 own that?

21 **A Yes.**

22 **Q** And that was prior to the

23 marriage?

24 **A Yes.**

25 **Q** 2013 Scag Tiger Cat, prior to

1 **the documents. I don't know. It's**

2 **worth about 38,000.**

3 **Q** Pioneer UTV. This is not the --

4 **A That's the same thing that you**

5 **were talking about earlier that got --**

6 **Q** Okay.

7 **A** I'll tell you actually what I

8 **did, was I took it to a service place.**

9 **And he said, you don't want to know**

10 **what's going on here, would you like to**

11 **trade it? And I said, I feel like this**

12 **is shady but, yes, I would like to trade**

13 **it, because I need one.**

14 **Q** Tell me about the Corvette.

15 **A It's a rental. But it sure was**

16 **fun to drive. I'd like to own it.**

17 **Q** And have I covered your [redacted]

18 accounts, the three accounts we

19 discussed?

20 **A I believe that we have discussed**

21 **all of the accounts that I own.**

22 **Q** Okay. Do you have an Ascend

23 Federal Credit Union?

24 **A No, I don't.**

25 **Q** I'm sorry, you have a Charles

1 the marriage?

2 **A That was -- that was Matthew's.**

3 **It went to the house.**

4 **Q** How much do you think it was

5 worth when it was sold?

6 **A 2,500 or 3,000.**

7 **Q** Three-slant horse trailer, prior

8 to the marriage?

9 **A Yes.**

10 **Q** 2023 dovetail equipment trailer.

11 Prior?

12 **A No, that was purchased about two**

13 **months after the marriage.**

14 **Q** Where is it?

15 **A It's in my yard.**

16 **Q** How much is it worth?

17 **A 4,200, I think.**

18 **Q** Landscape trailer?

19 **A It's in my yard.**

20 **Q** The Honda truck -- Hyundai

21 truck.

22 **A Hyundai? That's what I bought**

23 **to replace the Subaru.**

24 **Q** How much did you spend?

25 **A I financed it. You've got all**

1 [redacted]

2 **A I have a Charles Schwab**

3 **investment account, a Charles Schwab**

4 **retirement account, a Fidelity**

5 **retirement account, and a United**

6 **Community account.**

7 **Q** The United Community is the

8 5,000?

9 **A Yeah.**

10 **Q** You don't use it. And the

11 Fidelity, is that the new retirement

12 account?

13 **A Yeah.**

14 **Q** And how much is in it?

15 **A I think I checked after the**

16 **whole tariff debacle the other day, and**

17 **it was, like, at 42.**

18 **Q** Okay. And how much is that --

19 What was the value of it during the

20 marriage?

21 **A You know, it's on that**

22 **spreadsheet that I sent over that**

23 **outlines it. I'm not sure the value.**

24 **Q** Let me ask this: Do you make

25 contributions still?

- 1 **A Yes, I haven't changed them.**  
 2 **Actually, they probably have changed**  
 3 **because annually I set it to just go up**  
 4 **by, like, \$10 biweekly or whatever.**  
 5 **Q** Okay. You took items with you  
 6 to Georgia that Mr. Kennedy brought to  
 7 your home?  
 8 **A Yes.**  
 9 **Q** All right. Mr. Kennedy says  
 10 that your list was not complete. So I'm  
 11 going to go through the list. Was there  
 12 a pet car dryer?  
 13 **MS. DUKE:** A what?  
 14 **MR. BATES:** Pet car dryer?  
 15 **MR. KENNEDY:** Hair.  
 16 **MR. BATES:** Hair. I can't  
 17 spell.  
 18 **BY MR. BATES:**  
 19 **Q** A pet hair dryer?  
 20 **A Maybe.**  
 21 **Q** Let me ask this: Did you sell  
 22 anything of Mr. Kennedy's?  
 23 **A No.**  
 24 **Q** Did you give it away?  
 25 **A No. No. My parents have the**

- 1 **washer and dryer up at their house right**  
 2 **now, but they haven't used it. I just**  
 3 **took it up there. It was taking up**  
 4 **space in my garage. So it's -- it's**  
 5 **stored there now.**  
 6 **Q** Anything else?  
 7 **A No.**  
 8 **Q** Did you allow somebody else to  
 9 sell things of Mr. Kennedy's?  
 10 **A No.**  
 11 **Q** You sure?  
 12 **A The welder that he put in that**  
 13 **print -- in that Facebook message, that**  
 14 **was actually the one that my dad gave to**  
 15 **me. I gave it to Tyler, and he sold it.**  
 16 **Q** Craftsman toolbox with four  
 17 outlet reel?  
 18 **A I don't even know what that is.**  
 19 **Q** Four kitchen drawer cart.  
 20 **A I think it's three drawers --**  
 21 **drawers, but it's still in the bird**  
 22 **room.**  
 23 **Q** In your home?  
 24 **A Uh-huh. (Affirmative).**  
 25 **Q** In Georgia?

- 1 **A Yes.**  
 2 **Q** Espresso machine?  
 3 **A I don't have that. I don't know**  
 4 **where it is. I thought he took it.**  
 5 **Q** Wood coffee cart?  
 6 **A Oh, is that separate from the**  
 7 **kitchen cart?**  
 8 **Q** Is it? Do you have a kitchen  
 9 cart?  
 10 **A Hang on, hold on. There are --**  
 11 **the wood cart was one that I bought for**  
 12 **him for Christmas. It is in the bird**  
 13 **room currently. His bird had chewed it**  
 14 **up historically, so it was really just**  
 15 **trash. But it's still in the bird room,**  
 16 **and I still have it.**  
 17 **The kitchen cart? I'm not sure**  
 18 **what he's referring to. It might be the**  
 19 **silver one with the three drawer pulls.**  
 20 **Three -- like, it's a wire cart. And if**  
 21 **that's it, I still have that, yes.**  
 22 **Q** Ridgid shop vac with car detail  
 23 accessory?  
 24 **A I don't have that.**  
 25 **Q** Did you ever have it?

- 1 **A I thought it was in his storage**  
 2 **unit. Matter of fact, I think I have it**  
 3 **on a picture in his storage unit.**  
 4 **Q** Dyson vacuum?  
 5 **A That was definitely in the**  
 6 **storage unit that he picked up.**  
 7 **Q** P.A. system?  
 8 **A I do actually have that. It's**  
 9 **in my garage.**  
 10 **Q** Why didn't you tell me about it?  
 11 **A Why didn't I tell you about it?**  
 12 **Because I forgot about it. I would have**  
 13 **put it on -- in the storage thing, but**  
 14 **it's heavy. But it's definitely not**  
 15 **worth \$800.**  
 16 **Q** How much do you think it's  
 17 worth?  
 18 **A Well, I just found one on**  
 19 **auction yesterday for 80, so I think**  
 20 **it's worth 80.**  
 21 **Q** Wireless microphone?  
 22 **A That's the same thing.**  
 23 **Q** Wired microphone, microphone  
 24 stand, all part of the same?  
 25 **A Yeah.**

1 **MS. DUKE:** Let me go off the  
 2 record for a second.  
 3 (Off-the-record discussion.)  
 4 **A** **The challenge is it's really**  
 5 **heavy. It's in this, like, weird case**  
 6 **thing. And so I have moved that around**  
 7 **my garage a couple of times. If you**  
 8 **wanted to send some people over to pick**  
 9 **that up and some other stuff...**  
 10 **Q** Is there a welder?  
 11 **A** **I have a welder still, yeah.**  
 12 **Q** Was that for Mr. Kennedy?  
 13 **A** **Uh-huh. (Affirmative).**  
 14 **Q** Why do you have it?  
 15 **A** **Because he didn't take it with**  
 16 **him.**  
 17 **MR. KENNEDY:** How can I?  
 18 **MR. BATES:** I know you enjoyed  
 19 your deposition, but it's over.  
 20 **BY MR. BATES:**  
 21 **Q** All right. This is something he  
 22 brought into the marriage?  
 23 **A** **Yes.**  
 24 **Q** Missing hand tools. Do you have  
 25 things of his, hand tools, things like

1 that?  
 2 **A** **I am certain that there are some**  
 3 **of his hand tools mixed in with the**  
 4 **tools that I use, yes.**  
 5 **Q** Remotes, that's stuff that you  
 6 have. Native American pottery?  
 7 **A** **That was in the totes that he**  
 8 **picked up.**  
 9 **Q** You have nothing left?  
 10 **A** **Not that I know of.**  
 11 **Q** Do you have any objection to  
 12 going back through your home and  
 13 contents to see if anything else of his  
 14 is in there?  
 15 **A** **I don't, but I'm trying to think**  
 16 **of where I haven't looked. I didn't put**  
 17 **any of his stuff in the attic. It was**  
 18 **all in the garage.**  
 19 **Q** Tractor implements?  
 20 **A** **Those are all mine.**  
 21 **Q** Soldering station? Do you have  
 22 a soldering station?  
 23 **A** **It may -- there is a tote in my**  
 24 **garage that has, like, 18 bottles of**  
 25 **WD-40 and some other stuff that I**

1 **believe is probably his. What is a**  
 2 **soldering station? I need to -- I need**  
 3 **clarity. What does that mean?**  
 4 **MS. DUKE:** It's where it welds  
 5 little --  
 6 **THE WITNESS:** Well, I mean, I  
 7 know what a soldering iron is. But  
 8 a soldering station, I don't know  
 9 what that is.  
 10 **BY MR. BATES:**  
 11 **Q** Native American book collection?  
 12 **A** **I don't have that.**  
 13 **Q** Electric mantle fireplace?  
 14 **A** **I do have that, and I would love**  
 15 **to get it out of my house.**  
 16 **Q** You did take it to your house,  
 17 or do you say Mr. Kennedy brought it to  
 18 you?  
 19 **A** **No, he -- he abandoned things at**  
 20 **the house that I had to get out of there**  
 21 **when I moved. I had no choice but to**  
 22 **take them.**  
 23 **Q** 32-inch Vizio smart TV?  
 24 **A** **I do think I still have that.**  
 25 **Q** Assorted electric components.

1 Electrical, electronic components.  
 2 **A** **I don't know about that.**  
 3 **Q** Butcher block top?  
 4 **A** **That was salvaged from my**  
 5 **neighbor's backyard. And, yes, I do**  
 6 **have it. And, no, it is not his.**  
 7 **Q** Mechanics creeper with tool  
 8 drawers?  
 9 **A** **I think he has that.**  
 10 **Q** Did Mr. Kennedy move the  
 11 neighbor out, and in consideration of  
 12 that, received the butcher block top?  
 13 **A** **Not any more than I did. We**  
 14 **both helped her move out.**  
 15 **Q** But the neighbor gave it to you  
 16 all?  
 17 **A** **Yes. She -- she abandoned it**  
 18 **there, and he picked it up.**  
 19 **Q** He picked it up?  
 20 **A** **Yeah.**  
 21 **Q** Okay. But you took it with you?  
 22 **A** **Again, it was abandoned, again,**  
 23 **at the --**  
 24 **Q** Okay.  
 25 **A** **Apparently, it's been abandoned**

1 **several times. It's got issues now.**  
 2 **Q** The landscape trailer?  
 3 **A** Yeah.  
 4 **Q** This was purchased during the  
 5 marriage?  
 6 **A** **No, that he brought that into**  
 7 **the marriage.**  
 8 **Q** Do you still have?  
 9 **A** I do.  
 10 **Q** The blue and gold Macaw.  
 11 **A** Yep.  
 12 **Q** That's what Mr. Kennedy brought  
 13 into the marriage?  
 14 **A** **He didn't bring it. He didn't**  
 15 **technically bring her into the marriage.**  
 16 **We went and rescued her from Indiana**  
 17 **after we were together. He did use his**  
 18 **separate funds to buy that bird.**  
 19 **Q** And you have it?  
 20 **A** I do.  
 21 **Q** Do you want to hold onto it?  
 22 **A** **I don't think he should have a**  
 23 **bird. He did beat her. That did**  
 24 **happen.**  
 25 **Q** US General toolbox?

1 **A** I've got it.  
 2 **Q** Purchased during the marriage,  
 3 or was it gifted?  
 4 **A** **It was -- yes, it was a Father's**  
 5 **Day gift to him.**  
 6 **Q** Are you willing for him to have  
 7 it back?  
 8 **A** **I mean, it looks fine where it**  
 9 **is. I had to move it to where it is.**  
 10 **Let's look at the balance sheet and see**  
 11 **where we end up.**  
 12 **Q** All right, fair enough. DeWalt  
 13 table saw?  
 14 **A** **I have that too.**  
 15 **Q** You have a horse named Lexi?  
 16 **A** I do.  
 17 **Q** How much is it worth?  
 18 **A** **I think he said she was worth 20**  
 19 **to 50,000. And I want to propose that**  
 20 **if he would like to pay me 15,000 for**  
 21 **her, he can have her today. Same thing**  
 22 **goes for his -- his assignment of value**  
 23 **to Luka and Diva. I owned those before**  
 24 **the marriage.**  
 25 **Q** Was Lexi purchased during the

1 marriage?  
 2 **A** **No. Luka was born during the**  
 3 **marriage, but his breeding was paid for**  
 4 **before the marriage.**  
 5 **Q** Luka was born during the  
 6 marriage?  
 7 **A** **Correct.**  
 8 **Q** The breeding was --  
 9 **A** **-- paid for before the marriage.**  
 10 **Q** Was the breeding paid for when  
 11 you and Mr. Kennedy were living  
 12 together?  
 13 **A** **Yes.**  
 14 **Q** And was this during a year that  
 15 you ended up filing a joint tax return?  
 16 **A** **I would have to look. I don't**  
 17 **know.**  
 18 **Q** And part of your --  
 19 **A** **His breeding fee was \$500.**  
 20 **Q** Okay. Thank you. All right.  
 21 **A** **And while I love that horse, if**  
 22 **he can get 120,000 for him, I'll let him**  
 23 **do it.**  
 24 **MR. BATES:** Let me talk to my  
 25 client, please.

1 (A recess was taken.)  
 2 **BY MR. BATES:**  
 3 **Q** The rental car, who did you rent  
 4 it from, what company?  
 5 **A** **Citywide Autos.**  
 6 **Q** And it has a personalized plate?  
 7 **A** **It says Citywide on it.**  
 8 **Q** Okay. Are you in any kind of  
 9 romantic relationship at the time, right  
 10 now?  
 11 **A** **No.**  
 12 **Q** Have you been since the divorce  
 13 was filed?  
 14 **A** **No.**  
 15 **Q** Since the date of the marriage?  
 16 **A** **Nope.**  
 17 **Q** Have you had any kind of  
 18 romantic interlude, however brief?  
 19 **A** **Nope.**  
 20 **Q** Is anybody living with you in  
 21 ~~Atlanta~~ Georgia?  
 22 **A** **No.**  
 23 **Q** Have you stated on social media  
 24 that you're in a relationship?  
 25 **A** **With my bird.**

- 1 Q Okay. That's the bird you're  
2 talking about?
- 3 A With my bird.
- 4 Q Have you ever been diagnosed  
5 with an STD during the marriage or  
6 before?
- 7 A No.
- 8 MS. DUKE: Asked and answered.
- 9 BY MR. BATES:
- 10 Q Have you moved any other money  
11 beyond what we've discussed today from  
12 the large brokerage account? And let me  
13 summarize.
- 14 During the marriage, you would  
15 transfer over from brokerage to checking  
16 approximately --
- 17 A Uh-huh. (Affirmative).
- 18 Q -- \$6,000 a month?
- 19 Okay. The pole barn in Georgia,  
20 the purchase -- the purchase of the home  
21 in Georgia, --
- 22 A Uh-huh. (Affirmative).
- 23 Q -- how much was the purchase of  
24 the home?
- 25 A 675.

- 1 Q And how much was used from the  
2 proceeds?
- 3 A Well, the 675 plus the 1 -- I  
4 think it was 160. It was actually on  
5 the taxes, 160,000.
- 6 Q That was from the proceeds of  
7 the sale?
- 8 A The 160,000 for the barn, and  
9 the -- and the fencing that came from  
10 the proceeds of the sale, yes.
- 11 Q So it was a combined 830,000?
- 12 A Yeah. And then I had huge  
13 capital gains taxes, as you saw.
- 14 Q And so the proceeds -- You sold  
15 the home, the proceeds went into the  
16 brokerage account.
- 17 A Uh-huh. (Affirmative).
- 18 Q And the brokerage account paid  
19 for the [redacted] Georgia home?
- 20 A Correct.
- 21 Q If there was any left over, it  
22 stayed in the brokerage account?
- 23 A Yeah.
- 24 Q Were you contemplating divorce  
25 when you purchased the home in Georgia?

- 1 A Yeah, I'd already filed.
- 2 Q Was it your understanding that  
3 buying out of state provided you any  
4 kind of benefit in this divorce?
- 5 A No, no. It was just -- that  
6 house is an hour from my brother. It's  
7 two hours from my mom and dad right now,  
8 but they're moving to their other house  
9 that's about 45 minutes from me. And  
10 they're in their 80s, so it's good to be  
11 close to them.
- 12 Q What's the value of all the  
13 artwork and prints in your possession?
- 14 A I don't know. I have a couple  
15 of Itzhak Sankowsky artwork. Two of  
16 them that are absolutely horrendous.  
17 They're in my attic right now. But they  
18 are going to [redacted] whenever  
19 she can pick them up.
- 20 The only one that I have really  
21 of any -- that I can ascertain the value  
22 of is the Agam print, and it's worth  
23 about [redacted]. I think the Sankowsky's  
24 are worth a lot more, but they belong in  
25 her family. They were her grandmother's

- 1 prints.
- 2 Q Who is [redacted] again?
- 3 A That's [redacted] daughter.
- 4 Q And you received it from [redacted]?
- 5 A Yeah.
- 6 Q So you're saying if I paid you  
7 \$5,000, I can have all your artworks?
- 8 A No, I can't transfer those  
9 out -- outside of her family. Those are  
10 earmarked for her.
- 11 Q On any legally binding document?
- 12 A No.
- 13 Q Just, you feel compelled to give  
14 it to her.
- 15 A We've been in communication  
16 about it. It's -- I mean, it's her  
17 grandmother's artwork, and her  
18 grandmother acquired it.
- 19 MS. DUKE: I'm going to object  
20 to this line of questioning. I  
21 mean, if it's inherited, it's  
22 inherited.
- 23 BY MR. BATES:
- 24 Q It's inherited by you?
- 25 A Correct.

1 Q I'm just trying to determine the  
 2 value of your separate property as --  
 3 A That has no value. That has --  
 4 that has zero value to me because I  
 5 wouldn't sell it. Period. It goes to  
 6 Stephanie Elias. And if she doesn't  
 7 want it, I will transfer it to Rosalie  
 8 Elias and keep it in their family. It's  
 9 Jewish Israeli artwork.  
 10 MS. DUKE: That's mine.  
 11 MR. BATES: Give it back to  
 12 her.  
 13 MR. KENNEDY: These spin best.  
 14 MS. DUKE: That's mine.  
 15 MR. BATES: Give it back to  
 16 her.  
 17 MR. KENNEDY: But watch --  
 18 MR. BATES: Matthew, give it  
 19 back to her.  
 20 A It's Israeli artwork. So it has  
 21 some very sentimental value to their  
 22 family.  
 23 BY MR. BATES:  
 24 Q How much is it worth, though?  
 25 A \$10,000 to sell it on the open

1 market. Sankowski has gone down in  
 2 value for some reason, I don't know.  
 3 Q Okay. So the value of all your  
 4 artworks, whether you have a moral  
 5 obligation to provide it to the family  
 6 or not, it's worth approximately 15 --  
 7 14 or \$15,000.  
 8 A Yeah, I'm comfortable with that,  
 9 yeah.  
 10 Q Have you taken trips during this  
 11 divorce case?  
 12 A Work trips, yes.  
 13 Q International?  
 14 A No.  
 15 Q Do you travel alone?  
 16 A Yes, I do.  
 17 Q Have you ever been accused of  
 18 having an alcohol abuse disorder of any  
 19 kind?  
 20 A Only by him. After -- after  
 21 [redacted] passed away, I drank a lot. My  
 22 favorite thing to do was get out on the  
 23 tractor on a Friday and drink a six-pack  
 24 of beer and fling the beer bottles into  
 25 the ravine. Favorite thing.

1 You know what? I still like  
 2 getting on the tractor on Friday after a  
 3 hard day at work when it's sunny and  
 4 having a beer.  
 5 But, no, I don't have an alcohol  
 6 problem. I did have a -- a period of  
 7 time where I drank more than I was happy  
 8 about, and I quit. So...  
 9 Q Did you quit prior to dating --  
 10 A Yeah.  
 11 Q -- Mr. Kennedy?  
 12 A Yeah.  
 13 Q Did you ever hide alcohol from  
 14 Mr. Kennedy?  
 15 A No, we hid alcohol when we  
 16 traveled. When we traveled, we hid the  
 17 alcohol. My daughter was staying in the  
 18 house. And that was one of the things  
 19 he threw at me was a tequila bottle,  
 20 because he would have sworn there was  
 21 more in it when -- when we left than  
 22 there was when we got back. And I was  
 23 like, no, there's not, she didn't go in  
 24 our closet.  
 25 Q Did you receive -- strike that.

1 Why would you hide alcohol when  
 2 you traveled? You mean in the home?  
 3 A Yeah.  
 4 Q I see.  
 5 A Yeah.  
 6 Q And your daughter, was it  
 7 because she was underage or because she  
 8 had a drinking problem?  
 9 A No, it was because he had a  
 10 problem with her being in the house.  
 11 Q I see.  
 12 A No, he had a perception problem.  
 13 That was the real challenge, I think.  
 14 Q What was Mr. Kennedy like when  
 15 you all's relationship was an eight out  
 16 of ten?  
 17 A He was kind. I thought he was  
 18 caring. He was helpful. Helpful.  
 19 Q In what ways?  
 20 A Like, if I was carrying  
 21 groceries in, he would come out and help  
 22 me carry groceries in, help me put  
 23 groceries away.  
 24 I will not deny that of the two  
 25 of us, he is cleaner. Like, he is

1 **obsessively clean, which is phenomenal**  
2 **to be around until you're around it for**  
3 **too long. It's -- he's -- he's just --**  
4 **he's a clean person. If he's not having**  
5 **a tantrum, he's easy to be around**  
6 **because he is clean and quiet.**

7 **Q** You agree that, whether there  
8 was an agreement or alliance or not,  
9 Mr. Kennedy did kind of uproot his life  
10 and invest it in you all's life  
11 together?

12 **A** I agree that he did exactly what  
13 **90 percent of women in the U.S. do on a**  
14 **daily basis. I agree that he didn't do**  
15 **anything that I wouldn't have done. If**  
16 **his property had been suited for my**  
17 **animals, I would have sold my house and**  
18 **moved in with him. Because why? It's**  
19 **easier. And then I've got a bunch of**  
20 **cash, and I don't have a bunch of**  
21 **expenses.**

22 **So, I would not necessarily**  
23 **agree that he made a bad decision.**

24 **Q** You would not agree he made a  
25 bad decision?

1 **A** Correct.

2 **Q** Do you think he made a good  
3 decision?

4 **A** I think he sold his house at the  
5 **peak of its value. And, I think if you**  
6 **look at Zillow, it's actually dropped**  
7 **down a little bit from where it was when**  
8 **he sold it, and he made a nice profit.**

9 **Q** Did he sell it in 2021?

10 **A** Uh-huh. (Affirmative).

11 **Q** Yes?

12 **A** Yes. Sorry.

13 **Q** And you agree that interest  
14 rates have significantly increased since  
15 then?

16 **A** I would agree that they are  
17 **higher than his 4.8 percent, yeah.**  
18 **They're about a -- they're -- they're**  
19 **about a point higher.**

20 **Q** Did you ever make any statement  
21 to him that conditioned his ability to  
22 live with you?

23 **A** No.

24 **Q** Did you tell him, you could live  
25 with me?

1 **A** Yeah. The bar is really low for  
2 me, Doug. Just don't be an asshole.  
3 That was my condition. It was never  
4 stated, it was never a stated condition,  
5 because I kind of expected everybody  
6 would know, you know, be a decent human.

7 **Q** What did Mr. Kennedy do wrong  
8 during the marriage to you?

9 **A** Well --

10 **Q** If anything?

11 **A** There were lots of things.  
12 Let's just start with the -- we -- I  
13 think it was October of 2023. I think  
14 it was October 2023, we made a road trip  
15 up to Richmond to pick up Bougie, the  
16 bird, and Nixie. The agreement that was  
17 made was that in exchange for picking  
18 Nixie up, we got all these cages and  
19 accessories and things. And Nixie was  
20 promised to another individual who had  
21 bought him.

22 **And we're driving back, and he's**  
23 **demanding that we keep Nixie. And I was**  
24 **like, we can't, I made an agreement.**  
25 **And he pitched an absolute fit. He**

1 trapped me in the horse trailer that we  
2 had taken up there to bring the cages  
3 back in, calling me a whore. Just  
4 absolutely degrading me. He called --  
5 he accused me of cheating over and over  
6 and over again. I never cheated on the  
7 man. Never.

8 **He tracked my location. In**  
9 **order to get to Hilary's office, to**  
10 **enable myself to file for divorce, to**  
11 **sign, I had to do this whole elaborate**  
12 **operation of telling him that I was**  
13 **going to the Verizon store. I go to the**  
14 **Verizon store, turn off my tracking, go**  
15 **to Hilary's office in order to sign**  
16 **papers. Sneak over to the ATM and get**  
17 **cash so that I could actually pay the**  
18 **filing fees that I didn't realize I had**  
19 **to pay.**


20 **I mean, it was -- it was awful**  
21 **being under his surveillance all the**  
22 **time.**

23 **Q** Did you call Mr. Kennedy crying  
24 after you filed and told him?

25 **A** Not that I recall.

1 Q Did you talk to him about it?  
 2 A After I filed, no, absolutely  
 3 not. All the advice in the world is  
 4 that you don't tell somebody with his  
 5 certain personality traits that you have  
 6 filed when you have done it.  
 7 Q What personality traits does he  
 8 have?  
 9 A Aggressive.  
 10 Q It's your opinion that he never  
 11 showed those traits with you prior to  
 12 marrying him?  
 13 A No, Doug, I wish that were true.  
 14 He did. He did show me one time, and I  
 15 brushed it under the rug. He  
 16 apologized, said he was tired. He was,  
 17 you know, overstressed about something,  
 18 and it would never happen again. Well,  
 19 after we got married, it happened again.  
 20 Q Did you track him using the  
 21 Subaru app at times?  
 22 A After he took it?  
 23 Q Yes.  
 24 A Yes.  
 25 Q Why?

REPORTER'S CERTIFICATE

1  
 2  
 3 I, Tami K. Hornick, LCR #199, Licensed  
 4 and Certified Court Reporter in and for  
 5 the State of Tennessee,  
 6 DO HEREBY CERTIFY that the above  
 7 deposition or hearing was reported by me,  
 8 and that the foregoing transcript is a  
 9 true and accurate record to the best of  
 10 my knowledge, skills and ability.  
 11 I FURTHER CERTIFY that I am not  
 12 related to nor an employee of counsel or  
 13 any of the parties to the action, nor am  
 14 I in any way financially interested in  
 15 the outcome of this case.  
 16 I FURTHER CERTIFY that I am duly  
 17 licensed by the Tennessee Board of Court  
 18 Reporting as a Licensed Court Reporter as  
 19 evidenced by the LCR number following my  
 20 name below.  
 21 IN WITNESS WHEREOF, I have hereunto  
 22 set my hand and affixed my official seal  
 23 this 11TH day of August, 2025.  
 24  
 25   
 Tami K. Hornick, CCR, LCR #199  
 Certified and Licensed  
 Court Reporter for  
 the State of Tennessee

1 A I put -- what I did was I put a  
 2 perimeter around my house, that if he  
 3 came within that perimeter, I got an  
 4 alert. I also had speed alerts on there  
 5 because it was still my asset. Right?  
 6 It was still -- I bought it before we  
 7 were married. It was still my asset,  
 8 and he was devaluing it at a rate that  
 9 seemed really unreasonable.  
 10 Q How many parrots did you sell my  
 11 father?  
 12 A How many what?  
 13 Q Parrots did you sell my father?  
 14 A I didn't sell your father a  
 15 parrot.  
 16 Q I thought that you gave him a  
 17 parrot or something?  
 18 A No.  
 19 MR. BATES: Those are my  
 20 questions.  
 21  
 22 AND FURTHER THIS DEPONENT SAITH NOT  
 23 /Signature Waived/  
 24  
 25