

IN THE DISTRICT COURT OF APPEAL  
THIRD DISTRICT

Stan Fitzgerald,  
Appellant,

VS.

Angie Wong,  
Appellee.

**TRANSCRIPT OF PROCEEDINGS**

# **RECORD ON APPEAL**

FROM THE CIRCUIT COURT OF

MIAMI-DADE COUNTY, FLORIDA

FAMILY DIVISION CASE NO. 2024-019469-FC-04

DISTRICT COURT CASE NO. 3D25-0583

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1 IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT  
2 IN AND FOR MIAMI-DADE COUNTY, FLORIDA

3  
4 CASE NO.: 2024-019469-FC-04

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7 ANGIE WONG,  
8 PETITIONER,

9  
10 VS.

11  
12 STAN FITZGERALD,  
13 RESPONDENT.

14 \_\_\_\_\_ /  
15 TRIAL BEFORE THE HONORABLE YARA LORENZO KLUKAS - VOLUME II

16 DATE: MARCH 3, 2025

17 PLACE: LAWSON E. THOMAS COURT CENTER  
18 175 NORTHWEST 1ST AVENUE  
19 MIAMI, FLORIDA 33128

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STIPULATION

THE TRIAL BEFORE THE HONORABLE JUDGE YARA LORENZO  
KLUKAS TAKEN AT LAWSON E. THOMAS COURT CENTER, 175  
NORTHWEST 1ST AVENUE, MIAMI, FLORIDA 33128, ON MONDAY  
THE 3RD DAY OF MARCH 2025; SAID TRIAL WAS TAKEN  
PURSUANT TO THE FLORIDA RULES OF CIVIL PROCEDURE.

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## 1 PROCEEDINGS

2 JUDGE KLUKAS: All right. We're on the  
3 record. Well, let's -- 1, 2, 3. Test 1, 2, 3. I  
4 don't know why there's still this echo.

5 MR. DEFILIPPO: I have to lower my volume.

6 JUDGE KLUKAS: Yeah, you need to turn it  
7 off.

8 MR. DEFILIPPO: Sorry. There we go.

9 JUDGE KLUKAS: Okay. 1, 2, 3. All right.  
10 All right. This is 2024-019469-FC-04, Wong versus  
11 Fitzgerald. We are set today on the second day of the  
12 special-set hearing. We are continuing from testimony  
13 on the first day where I heard from Ms. Wong and I  
14 heard from one of the petitioner's witnesses. Does  
15 the petitioner wish to call additional witnesses at  
16 this time, or do you want to start with her cross-  
17 examination which we didn't do?

18 MR. DEFILIPPO: We have one additional  
19 witness. His name is Mr. Butch Conz, and I don't see  
20 him in the waiting room, but I believe he might have  
21 to be let in.

22 JUDGE KLUKAS: Lizbeth, do you have anybody  
23 in the waiting room? I'm not seeing anybody. Do you  
24 want to call?

25 MR. DEFILIPPO: I'll give him a call now,

1 Judge.

2 JUDGE KLUKAS: Okay. So you want to start  
3 with --

4 MR. DEFILIPPO: With Mr. Conz, and then we -  
5 - if I could be allowed to ask some questions of my  
6 client as far as the supplemental petition that we  
7 filed, I can give a copy to Your Honor.

8 JUDGE KLUKAS: I have a copy.

9 MR. DEFILIPPO: It's not really alleging  
10 anything new. It's just giving dates and more  
11 specifics as far as the allegations that were made  
12 last time, Your Honor. And then I think we'd be done  
13 with our case in chief at that point.

14 JUDGE KLUKAS: Okay. All right. Well, I  
15 don't see the witness, so why don't you go ahead.  
16 Let's swear the parties in. Let me have both sides  
17 (inaudible).

18 COURT CLERK: Raise your hands please. Do  
19 you swear or affirm to tell the truth, the whole  
20 truth, and nothing but the truth?

21 MS. WONG: Yes.

22 COURT CLERK: Yes, sir?

23 MR. FITZGERALD: I do.

24 COURT CLERK: Thank you.

25 JUDGE KLUKAS: Okay. Just a housekeeping

1 matter. Mr. Fitzgerald, sir, is your email  
2 forgetthegouge@aol.com?

3 MR. FITZGERALD: Yes, it is, Your Honor.

4 JUDGE KLUKAS: Okay. I'm going to ask that  
5 you stop emailing my staff as a CC to any emails that  
6 you're sending.

7 MR. FITZGERALD: Yes, Your Honor.

8 JUDGE KLUKAS: Okay. Go ahead, Mr.  
9 DeFilippo.

10 MR. DEFILIPPO: I just texted Mr. Conz to  
11 appear. He just sent back. He says he's logged in.

12 JUDGE KLUKAS: Liz, do you have him logged  
13 in? Do you have anybody in the --

14 UNIDENTIFIED SPEAKER: Sorry, on what?

15 JUDGE KLUKAS: Do you have somebody in the  
16 chat -- in the wait room?

17 UNIDENTIFIED SPEAKER: Yeah.

18 JUDGE KLUKAS: Why am I -- okay. Can you  
19 make me co-host?

20 UNIDENTIFIED SPEAKER: You are.

21 JUDGE KLUKAS: There we go. Now he's on.

22 MR. DEFILIPPO: Excellent. Thank you, Your  
23 Honor.

24 JUDGE KLUKAS: All right. Good afternoon.  
25 Mr. Conz, can you turn on your camera and unmute your

1 audio please?

2 MR. SMITH: Your Honor, may I cross-examine  
3 Ms. Wong before Mr. Conz testifying?

4 MR. CONZ: Excuse me?

5 JUDGE KLUKAS: I can -- one moment, sir.

6 MR. SMITH: I'm sorry. I misunderstood at  
7 the beginning. I wasn't sure that -- I didn't realize  
8 that we were going to call him before I had an  
9 opportunity to cross-examine Ms. Wong.

10 JUDGE KLUKAS: Okay.

11 MR. DEFILIPPO: Your Honor, I can complete  
12 my questions of Ms. Wong, and then we can go to cross,  
13 and then we can call.

14 JUDGE KLUKAS: Yeah, why don't we do that?

15 MR. DEFILIPPO: Okay.

16 JUDGE KLUKAS: I don't have a problem with  
17 that. Just, Liz, let him know that we are addressing  
18 another witness, and we'll be with him in a moment.

19 Okay?

20 Okay. Go ahead.

21 MR. DEFILIPPO: May I inquire, Your Honor?

22 UNIDENTIFIED SPEAKER: Thank you.

23 JUDGE KLUKAS: Yes.

24 DIRECT EXAMINATION

25 BY MR. DEFILIPPO:

1 Q All right. Ms. Wong, if you could please  
2 tell us who's Mr. Butch Conz? How do you know him?

3 A Mr. Butch Conz is a man in North Carolina.  
4 I don't remember how we met, but Stan Fitzgerald and  
5 Jerry Craig had sold him a state chapter for a fake  
6 Veterans for America First organization.

7 MR. SMITH: Objection.

8 THE WITNESS: -- in which he purchased --

9 JUDGE KLUKAS: One moment, Ms. --

10 MR. SMITH: The -- she's saying that there  
11 was a fake chapter sold, and there's no facts in  
12 evidence that it was a fake chapter.

13 JUDGE KLUKAS: Okay. That'll be sustained.  
14 So why don't you rephrase that? I don't know what you  
15 mean by fake.

16 THE WITNESS: Okay. Mr. Conz told me that  
17 it was a fake chapter and a fake contract, and he got  
18 in touch with me because he saw that Stan Fitzgerald  
19 was after me online with all the online harassment.  
20 And I forget how we were -- got in touch, but somehow,  
21 we got in touch over social media and go --

22 BY MR. DEFILIPPO:

23 Q Let me ask you, you mentioned that Mr. Conz  
24 is aware of some of the harassment you've experienced.  
25 Can you elaborate as to how he knows about the

1 harassment?

2           A     I mean, it was all over the social media.  
3 It was all over the line. He spoke with Stan  
4 Fitzgerald. Mr. Conz thought he was -- that Stan  
5 Fitzgerald wanted to harm me, which is why he got in  
6 touch with me. And once he figured out that Mr.  
7 Fitzgerald is a fraud, he wanted to know my side of  
8 the story after hearing months and months and months  
9 about how I'm the bad guy, how I did all these bad  
10 things, according to Stan Fitzgerald.

11                     He wanted to hear my side of the story, and  
12 then soon enough, he started helping me. He realized  
13 that I was the victim in this case, and he started --  
14 we started finding out more and more about how much of  
15 a fraud this organization was, and we got other state  
16 chapters that Fitzgerald and Jared Craig sold to  
17 others.

18                     MR. DEFILIPPO: Objection. Relevance.

19                     BY MR. DEFILIPPO:

20           Q     And if we could limit the testimony to the  
21 specific instances of harassment and how the witness,  
22 Mr. Conz, is aware of those. What does he -- is he  
23 aware about the press releases?

24           A     I mean, it was everywhere. It was literally  
25 everywhere. Everything that Stan Fitzgerald wrote on

1 his website, on his Facebook, on Twitter, it was all  
2 about me, me, me, me, me and why I'm -- everything  
3 bad. Like, everything that I've been accused of, he  
4 has done himself. Those are the crimes that he has  
5 committed and has put my name onto his crimes. So  
6 Butch realized something was wrong here. Like, why is  
7 -- for over a year --

8 JUDGE KLUKAS: Let me jump in. How do you  
9 know Mr. Conz?

10 THE WITNESS: I know him through -- because  
11 the connection was both of us realizing that this fake  
12 organization existed, and that we were both victims of  
13 this fake fraud of an organization that was collecting  
14 donations, that was making fake endorsements of  
15 candidates -- political candidates. And that's how we  
16 found each other, along with other victims online of  
17 Mr. Fitzgerald. We all created a group and we all  
18 supported each other online.

19 BY MR. DEFILIPPO:

20 Q And so with regard to the specific evidence  
21 that we've introduced today, the press releases, the  
22 accusations of you being a spy for the Communist  
23 Chinese government, and you being prostitute, you  
24 engaging in illegal activities, does Mr. Conz have  
25 firsthand knowledge of these attempts to slander you

1 and to cyber-harass you?

2 A Yes. He initially was very careful when he  
3 approached me. He's been told over and over again  
4 that I'm a Chinese Communist spy.

5 Q When you say he in that sentence, who are  
6 you --

7 A That is Butch Conz and his wife, Eileen  
8 Conz. They did some research on Stan, had a  
9 background -- produced an investigation on Stan. They  
10 hired a private detective to go and do a background  
11 search on Mr. Fitzgerald and found out that he is  
12 complete fraud, and sent me this book that details all  
13 of Fitzgerald's crimes in the 1990s to 2000s, and  
14 crimes that he continues to commit today in the  
15 public.

16 Q Did Mr. Conz initially repeat some of the  
17 allegations that the respondent was making about you,  
18 and then have a change of position as far as the  
19 validity of those allegations?

20 A Yes. The private investigator who created  
21 the report on Stan Fitzgerald and his associates, Stan  
22 Fitzgerald tried to have a huge portion of that  
23 redacted before the Conzes got it. He tried to redact  
24 the entire history of Operation Bullpen from that  
25 report getting to the Conzes.

1 MR. SMITH: Your Honor, I would just object  
2 based on relevance.

3 JUDGE KLUKAS: Sustained.

4 BY MR. DEFILIPPO:

5 Q Okay. Ms. Wong, since our last hearing  
6 date, have you discovered any recent releases or  
7 communications from the respondent about you?

8 MR. SMITH: I would object, Judge. I  
9 haven't seen anything that I would be able to review  
10 today.

11 MR. DEFILIPPO: This (inaudible) this will  
12 be testimony evidence as far as what she saw since the  
13 hearing last for Your Honor to weigh.

14 JUDGE KLUKAS: Okay. Go ahead. I'm not --

15 THE WITNESS: I saw two posts --

16 JUDGE KLUKAS: Kind of it depends on what it  
17 is.

18 THE WITNESS: -- okay. I saw two, I  
19 believe, Twitter posts that were retweeted by Mr.  
20 Fitzgerald from his personal account. One stating  
21 that I'm sleeping with Patrick Collis, the former  
22 witness, which is completely false. And the other one  
23 going after Patrick Collis, the witness that was on  
24 Zoom last -- in our last hearing saying that he  
25 backstabbed him, that Stan Fitzgerald made him, and

1 that he would backstab him for me. Something along  
2 that sort. We have a copy of the two posts.

3 JUDGE KLUKAS: Okay. Show them to Mr.  
4 Smith.

5 BY MR. DEFILIPPO:

6 Q Okay. Did you -- what did we have in his  
7 post?

8 A I don't know. I sent it to you, but it was  
9 a retweet from his private account.

10 Q Okay. Let's table that for one moment.  
11 Okay. With regard -- now, there was -- if you may  
12 recall, the Court requested that we provide a little  
13 more detail about some examinations, and we did so in  
14 a supplemental petition that was filed. There's a  
15 copy of it for you. I just want to ask you some  
16 clarifying questions about these incidents that we've  
17 already --

18 A Sure.

19 Q -- discussed with the Court, we've already  
20 introduced some evidence regarding. So with regard to  
21 -- you may recall, we had -- you testified that the  
22 respondent at one point physically went to the office  
23 of your husband, Swire Properties?

24 A Yes.

25 Q And stated some allegations to the secretary

1 there about you. If you can -- do we now know a more  
2 definitive time as to when that occurred?

3 MR. SMITH: Your Honor, I believe that I  
4 objected to that based on hearsay, because there was  
5 no one here from Swire to testify regarding that. And  
6 so I would raise the same objection, that anything  
7 that she received from Swire would be hearsay.

8 JUDGE KLUKAS: Okay. Let me ask this  
9 question: Do you have an objection to -- aside from  
10 specific objections as you're going to raise them with  
11 respect to the incidents, to the petitioner's request  
12 to supplement her original petition?

13 MR. SMITH: Yes, Judge. I just saw that  
14 this morning and I haven't had a chance to address  
15 those. I'm not even sure what she's referring to in  
16 those -- in that petition.

17 JUDGE KLUKAS: So these are the incidents  
18 that were raised during the hearing.

19 MR. SMITH: Yeah.

20 JUDGE KLUKAS: Which we heard about. Like,  
21 for example, the Swire incident, the tire situation.  
22 Upon my review, there's nothing new here. I think  
23 they were just put into writing.

24 MR. SMITH: If there's nothing new, then,  
25 Judge, I would only have the specific objections.

1           JUDGE KLUKAS: Okay. I think it's -- I will  
2 grant the request, and we knew this was coming.  
3 Petitioner advised us that he may be filing a  
4 supplemental petition. I will grant the request to  
5 amend the initial petition to include these specific  
6 acts, but I will hear the respondent's objections to  
7 the specific incidents, you know, be it lack of  
8 evidence to support it, et cetera. So you can  
9 continue knowing that it's been included in the  
10 record, and that I'll hear from the defense if there  
11 are specific objections to each date.

12           MR. DEFILIPPO: Thank you, Your Honor.

13           BY MR. DEFILIPPO:

14           Q     So we actually introduced to the Court some  
15 emails, eight pages of emails -- sorry, nine pages of  
16 emails to Swire from -- who we believe is Mr.  
17 Fitzgerald, the respondent. We also attempted to  
18 discuss the -- an actual physical visit that happened.  
19 And we didn't really quite know the timetable, but now  
20 we do know. So please tell the Court, well, what  
21 occurred back in September of 2023.

22           A     Right. So around -- on or around September  
23 2023, Mr. Fitzgerald had visited my husband's office.  
24 He had put --

25           MR. SMITH: I would object based on hearsay

1 unless she personally observed Mr. Fitzgerald visit  
2 the office.

3 JUDGE KLUKAS: Okay. I'm going to overrule  
4 it. She has firsthand knowledge about what happened.  
5 I understand it's through what she learned from her  
6 husband. Go ahead.

7 THE WITNESS: Correct. He had put out a lot  
8 of posts -- Mr. Fitzgerald had put out a lot of posts  
9 about coming to visit my home and how I was not home.  
10 And he even said that I didn't live there in my home,  
11 given that he had doxed me with my home address from  
12 my Florida driver's license saying that that's not my  
13 home.

14 Then he visited my husband's office where my  
15 husband was not there, and harassed the front desk  
16 people at his office in Brickell, because that was the  
17 only listed address he could find for me. The other  
18 address he visited was my P.O. box saying, "Well, she  
19 doesn't live there either." So clearly, he was  
20 looking for me. He also went into my husband's social  
21 media accounts and --

22 JUDGE KLUKAS: Let's back up. We're on this  
23 first incident where he shows up to Swire. So tell me  
24 about that.

25 THE WITNESS: He goes to -- so Swire is a

1 very large office in Brickell. He goes up to the  
2 receptionist desk. I forget which floor, three or  
3 four at the time. They have moved since. And  
4 demanded to see David Martin. And it was more than  
5 one person, possibly three men altogether, one that  
6 fits Mr. Fitzgerald's description, salt and pepper  
7 hair, heavy weight, et cetera. They demanded and  
8 harassed the secretary in the front desk asking --

9 MR. SMITH: I would object now, because now  
10 she can't even say definitively that it was Mr.  
11 Fitzgerald. So not only is it third-party hearsay,  
12 but it's also a failure of a foundation because they  
13 can't even say it was him.

14 MR. DEFILIPPO: May I respond, Your Honor?  
15 It's a matter of weight, not admissibility, Your  
16 Honor.

17 JUDGE KLUKAS: Well, I mean, yes and no. So  
18 this allegation in the petition says that "Fitzgerald  
19 physically went to my husband's office." Do you know  
20 that it was him for certain, or do you believe based  
21 on a description that you received that it was him?

22 THE WITNESS: So later on, the office --

23 MR. DEFILIPPO: Answer the Court's question.

24 THE WITNESS: Yeah, I'm answering it by  
25 this. I had shown a picture of Mr. Fitzgerald to my

1 husband, and he had taken it to the senior offices --  
2 the senior members of his office because he had to  
3 explain to his bosses what happened there. And he  
4 took this picture and said, "This is the man who's  
5 after my wife. And he tried visiting. Did anyone see  
6 this man?" And they appeared -- it appeared to have  
7 been Mr. Fitzgerald who had visited the office that  
8 day.

9 JUDGE KLUKAS: But it was the receptionist  
10 that interacted with him. Did she identify him?

11 THE WITNESS: She was part of that  
12 discussion.

13 JUDGE KLUKAS: Okay.

14 MR. SMITH: And I would just renew the same  
15 objection as to hearsay.

16 JUDGE KLUKAS: Understood.

17 BY MR. DEFILIPPO:

18 Q Ms. Wong, the Exhibit 2 that we've  
19 introduced last time -- sorry. Exhibit 3 that we  
20 introduced last time, the email to Swire from the  
21 respondent -- who you believe to be the respondent.  
22 Did that come after the respondent's attempt to  
23 contact your husband at Swire in September 2023?

24 A I don't know if it came before or after. I  
25 do remember that the recipients of that harassment

1 email were people that my husband had taken  
2 photographs with over the years on his social media.  
3 So everyone that he had taken a photograph over the  
4 last two or three years, they were tagged in this  
5 email and given this harassing email saying I'm a  
6 prostitute. I'm a spy. That my family and I are  
7 being investigated by the FBI, which we now know has  
8 been falsely fabricated by Stan Fitzgerald. So --

9 Q Those individuals, were they Swire  
10 coworkers, or maybe supervisor, or any --

11 A They were the entire senior staff of the  
12 Swire properties, management team, as well as all of  
13 their big clients around the world.

14 Q Okay. Last time we discussed a period of  
15 time where you went down to your vehicle and noticed  
16 your vehicle was -- the tires were punctured, and this  
17 was at your apartment complex. We didn't really know  
18 the timetable as far as when that occurred, but now  
19 you do; right?

20 A Yes.

21 Q If you could tell the Court when that  
22 occurred, a little bit more about that allegation.

23 A Right. So after Mr. Fitzgerald started  
24 coming after me in the beginning of June 2023, between  
25 mid-June when I returned from my trip to Switzerland

1 until the end of August, my tires were punctured five  
2 times in my parking garage at my home.

3 JUDGE KLUKAS: At separate times?

4 THE WITNESS: Five separate times over --

5 JUDGE KLUKAS: Five different days?

6 THE WITNESS: -- over the six-week period or  
7 --

8 JUDGE KLUKAS: So you were gone this whole  
9 time?

10 THE WITNESS: I'm sorry?

11 JUDGE KLUKAS: You were gone the whole time?

12 THE WITNESS: No, no, no.

13 JUDGE KLUKAS: Oh.

14 THE WITNESS: I had returned from a trip  
15 around June 15th. That was when I first noticed my  
16 tires were punctured and I would have a repairman  
17 come.

18 JUDGE KLUKAS: Okay. Get it fixed, and then  
19 it get punctured again?

20 THE WITNESS: Five times in a row. Okay.  
21 And it was a very unusual nail. It's not your typical  
22 construction nail or something I would drive over. It  
23 was about that long. And I'm holding up about  
24 probably longer than my fingers, about five inches.  
25 These were specific nails that were put next to my

1 tire. So if I backed up or if I did something, it  
2 would puncture my tire, would go all the way through.

3 So much to the point where the repair guy  
4 kept coming over and over and over and saying, "What  
5 is going on here? This is very unusual. I've never  
6 seen that type of length of nails being driven." Now,  
7 all of this scared me because, one, I couldn't bring  
8 my kids to school.

9 Two, I would call the police, but the police  
10 wouldn't do anything other than take a report. Three,  
11 my management just said, "Well, go buy yourself a  
12 camera." But more importantly, other victims from his  
13 organization who've left his organization have also  
14 experienced vehicular --

15 MR. SMITH: Objection. Hearsay.

16 THE WITNESS: -- accidents.

17 JUDGE KLUKAS: That'll be sustained.

18 THE WITNESS: It's in press releases that  
19 he's released himself.

20 JUDGE KLUKAS: Okay.

21 BY MR. DEFILIPPO:

22 Q As with regard to your tires, Ms. Wong, did  
23 you report that to the police?

24 A Yes.

25 Q Did you report each of the five incidents to

1 the police?

2 A No, because I was bothering them by the time  
3 -- like, three rounds of it happened.

4 Q But our Exhibit 10 that we previously  
5 introduced, that does reflect at least a couple of the  
6 times that you --

7 A Correct.

8 Q -- reported; is that right?

9 A Right. And the police told me that it's --  
10 well, basically that I should get a camera for my car.

11 Q Did you get a camera?

12 A Yes.

13 Q And did the camera pick up any future --

14 A Yes.

15 Q -- or any activities afterwards?

16 A Yeah, the camera stopped after -- like, the  
17 entire incidences stopped after I got it. Like, a  
18 night vision camera for my car.

19 Q All right. Now, back in February 2024, you  
20 testified that -- or I believe you had brought up some  
21 information before that we can now clarify regarding  
22 some of the threatening social media posts that were  
23 made about you. Okay. One of which perhaps contained  
24 a direct threat. Can you elaborate more about those  
25 threats in February 2024?

1           A       Right.  So between the end of May 2023, up  
2 until this period that we're talking about, February  
3 2024, I had received multiple threats from both  
4 Fitzgerald, his lawyer, Jared Craig, and other  
5 associates from Mr. Fitzgerald.  This particular one  
6 was from the lawyer of Mr. Fitzgerald, who had filed a  
7 fraudulent lawsuit against me and now threatened me  
8 online even though he was the lawyer for the lawsuit -  
9 -

10           JUDGE KLUKAS:  Hold on.  Who are we talking  
11 about?  Not Mr. Smith?

12           MR. SMITH:  No, no.  This is -- I believe  
13 she's talking about Jared Craig, and that was going to  
14 be the basis of my objection, is that Jerry Craig is  
15 not a party to this action.

16           JUDGE KLUKAS:  Okay.

17           THE WITNESS:  But he is an associate of Mr.  
18 Fitzgerald, and they work together.  They claim to  
19 have -- they claim to own Veterans for America First  
20 together.

21           JUDGE KLUKAS:  And he's the respondent's  
22 witness, Jared Craig?

23           MR. SMITH:  Yes, Judge.

24           JUDGE KLUKAS:  Okay.  In the waiting room.  
25 Okay.

1           THE WITNESS: Okay. In the social media  
2 post. And the -- and this is one of many, many, he  
3 used a Proud Boys slang "FAFO," which I'm not sure I  
4 can say in the Court what it means. And it was  
5 directed at me that if I didn't sign the NDA, that all  
6 these bad things would happen to me.

7           JUDGE KLUKAS: When was that posted?

8           THE WITNESS: This was posted February 2024.

9           JUDGE KLUKAS: Do you have the post?

10          THE WITNESS: Yes.

11          JUDGE KLUKAS: This is not in evidence.

12          MR. DEFILIPPO: I do not believe so, Your  
13 Honor. And if I may have to print out some of these  
14 posts, Your Honor, to provide at the end of this  
15 questioning if it's possible.

16          JUDGE KLUKAS: Okay. I don't have a -- do  
17 you have a mobile printer?

18          MR. DEFILIPPO: I have it. I'm sure I have  
19 them on my inbox here. I can send them to the Court  
20 digitally, like I send to the opposing counsel  
21 digitally. We can show Your Honor the post, but I  
22 won't be able to print them right now. But if you  
23 could give me time or leave to supplement the record  
24 after the --

25          JUDGE KLUKAS: Okay.

1 MR. SMITH: Your Honor, I would object to  
2 the post to the extent that it is a post -- presumably  
3 I haven't seen it, but presumably from a third-party  
4 to this action. So I would object to it as to  
5 relevance.

6 JUDGE KLUKAS: Well, if it's a post made by  
7 Mr. Jared Craig, who's going to be the -- a defense  
8 witness, a respondent's witness, I do think it's  
9 relevant, but I don't have anything for you to offer  
10 into --

11 MR. SMITH: It will be --

12 JUDGE KLUKAS: -- the record.

13 MR. SMITH: -- it'll be --

14 JUDGE KLUKAS: So until that -- until such  
15 moment, I have nothing, but I do have her testimony  
16 concerning the incident. So Mr. Craig can be  
17 questioned about that.

18 BY MR. DEFILIPPO:

19 Q Now, you said you didn't know if you could  
20 say the term because it contains an expletive.  
21 Without saying the expletive --

22 A Yeah.

23 Q -- what did he say?

24 A He said, "Eff around and find out." And  
25 that is a term, at that time, that was used in a way

1 that was harmful for me. It was an absolute threat.  
2 It meant to me that the lawyer who thinks he's suing  
3 me in a Court that he was sanctioned in is coming  
4 after me and my family.

5 Q Okay. Now, a lot of testimony was discussed  
6 regarding an FBI investigation into you. Okay. As it  
7 stands today, have you ever been, to your knowledge,  
8 investigated by the FBI for anything?

9 A No. To my knowledge, I have not been  
10 investigated by the FBI. The entire FBI harassment  
11 was entirely fabricated by Mr. Fitzgerald. I even got  
12 the US Secret Service to look into this matter, and  
13 they gave me a letter, which I'm happy to produce that  
14 there is nothing, not even a warning on my file. I've  
15 received since our last hearing, a letter from  
16 Congresswoman Maria Salazar, who also looked into this  
17 matter, and she found it very disturbing that someone  
18 would call an American a foreign agent, and that at  
19 least 12 federal laws were broken by this person --

20 MR. SMITH: Judge, I would object.

21 THE WITNESS: -- who had called me.

22 MR. SMITH: I would object based on hearsay.  
23 I don't see a letter from Ms. Salazar.

24 JUDGE KLUKAS: I'll sustain that.

25 MR. DEFILIPPO: We have that letter as well,

1 Your Honor, which we can provide, but the letter  
2 itself does not -- it doesn't go into the content, but  
3 we have evidence that Ms. Salazar did reach out to Ms.  
4 Wong.

5 BY MR. DEFILIPPO:

6 Q And, Ms. Wong, why did she reach out to you?

7 A She offered protective services to me given  
8 what she had heard, and what her office had  
9 investigated about this circumstance.

10 Q Okay. I want to circle back to the stalking  
11 that you may have uncovered -- or I'm sorry, the  
12 hacking --

13 A Yes.

14 Q -- that you may have uncovered as to your  
15 accounts. Last time, we testified as to your Facebook  
16 being hacked by someone who lived in Acworth, Georgia.  
17 Do we know a little bit more detail about that? Like,  
18 the date that happened?

19 A Yes.

20 Q Can you tell the Court a little bit more  
21 about that, please?

22 A Mr. Fitzgerald and Jared Craig started  
23 harassing me at the end of May 2023. I remember it  
24 was Memorial Day weekend, and by June 7, 2023, one  
25 week later, I received a notice from Facebook in the

1 middle of the night saying that someone from Acworth,  
2 Georgia was trying to access my Facebook account. In  
3 this Court I provided a document of the actual alert,  
4 and now I'm providing additional documents stating  
5 that it is from Facebook, given that I had reported  
6 that incident to Facebook.

7 Q So the Court wanted to ensure that it was  
8 actually your Facebook and from Facebook. Now, were  
9 you able to get a screenshot that has Facebook on the  
10 top or your name listed on the screenshot?

11 A Yes. When I had reported it to Meta --  
12 Facebook -- Meta's the parent company -- it clearly  
13 says that the message is going to Facebook.

14 Q Okay. But from -- regards to that alert.

15 A Yeah.

16 Q Take a look. It does -- it doesn't say  
17 Facebook anywhere on it, but is this the most  
18 information you can get from that post?

19 A This is the full shot that I can get. It  
20 says, "Review recent login," and at 12:56 a.m. on a  
21 Chrome Window 10 computer, someone in Acworth, Georgia  
22 logged into my Facebook account.

23 Q Okay. And how do you know the date of that  
24 occurred?

25 A Because I screenshotted it on June 7, 2023.

1           Q     When you screenshotted that, did you save  
2 the picture of that alert into your phone's camera  
3 library?

4           A     Yes.

5           Q     And then when -- how did you find out the  
6 date? Did you go through your camera roll to figure  
7 out when this occurred?

8           A     Since this date, now photos are searchable  
9 on iPhones. I just typed in Acworth, Georgia, and  
10 they popped up.

11          Q     What popped up? What we're looking at here?

12          A     (Crosstalk) --

13          Q     This screenshot?

14          A     The highlighted -- yes, the highlighted  
15 portion popped up.

16               MR. DEFILIPPO: And so I'm moving to  
17 introduce what has been pre-marked as Exhibit 17 into  
18 evidence as Exhibit 17.

19               BY MR. DEFILIPPO:

20          Q     So the date that we see on the top left, is  
21 that something that you wrote? Is that something that  
22 your camera put on there as a -- as the date that you  
23 screenshotted it, so to speak?

24          A     So when I woke up at 7:00 a.m. that morning,  
25 I received an alert on my phone saying that someone in

1 Acworth, Georgia, was trying to break in or had broken  
2 into my Facebook account. And I took an immediate  
3 screenshot when I woke up, and that's what my iPhone  
4 recorded.

5 Q Okay.

6 MR. SMITH: And, Judge, I would object to  
7 that based on it doesn't say Facebook, it doesn't say  
8 that it was Mr. Fitzgerald, and best evidence, it  
9 doesn't direct (inaudible).

10 JUDGE KLUKAS: Okay. I'll admit it over  
11 objection, but give it the weight that I find  
12 appropriate, given again that -- but Mr. Fitzgerald  
13 resides in Acworth; is that correct?

14 (EXHIBIT 17 WAS ADMITTED INTO EVIDENCE.)

15 MR. SMITH: Yeah. Yes, Judge. It is.

16 JUDGE KLUKAS: Okay. Understood.

17 BY MR. DEFILIPPO:

18 Q Okay. Now, counsel made reference to IP  
19 addresses. Okay. I'm looking at here a map and some  
20 IP addresses from an IPinfo.io.

21 A Yep.

22 Q First off, what is IPinfo.io?

23 A It is an IP search function.

24 Q And what IP address are we looking at here  
25 in this exhibit, which is pre-marked as Exhibit 18?

1           A     Which one am I looking at?

2           Q     The IP address here that's listed on the  
3 top.

4           A     This is an IP address that was taken from a  
5 post that Stan Fitzgerald had sent since our last  
6 hearing.

7           Q     How were you able to uncover that at the  
8 address? How does that work?

9           A     After our last hearing, Mr. Fitzgerald sent  
10 around an article claiming that he won victory in this  
11 Court, and that I didn't get my restraining order and  
12 had sent around, I don't know to how many people, an  
13 article about it, which I'm sure we have and we can  
14 produce. This was the IP address that came back and  
15 it's Atlanta, Georgia. We traced it back. We pinned  
16 it. I had the cybersecurity person pin it, and he had  
17 said that it was going to the cop --

18           MR. SMITH: Objection. Hearsay from the  
19 cybersecurity.

20           THE WITNESS: Well, we can --

21           BY MR. DEFILIPPO:

22           Q     What did you learn?

23           A     Well, I had learned that this IP came from  
24 the Cobb County --

25           MR. SMITH: Objection. Calls for response

1 based on hearsay.

2 JUDGE KLUKAS: Okay. I'm going to sustain  
3 it as to that, but I do want to hear about the article  
4 and how you received it.

5 BY MR. DEFILIPPO:

6 Q The article that was made, what did -- this  
7 was an article that was posted after our last -- after  
8 one of the hearings in this very case?

9 A Yes.

10 Q Okay. What was stated in the article?

11 A It was stated that the opposing counsel,  
12 Jason Smith, had argued that I'm some alias that I'm  
13 not, and that he had won in this Court, and that I did  
14 not receive a TRO, something to that effect.

15 JUDGE KLUKAS: Who wrote the article?

16 THE WITNESS: Mr. Fitzgerald.

17 BY MR. DEFILIPPO:

18 Q How do you know it was Mr. Fitzgerald?

19 A Because it was listed in his website that he  
20 owns.

21 JUDGE KLUKAS: What was it --

22 THE WITNESS: Because it was published on  
23 the website that he owns.

24 JUDGE KLUKAS: -- what website is that?

25 THE WITNESS: What?

1 JUDGE KLUKAS: What website?

2 THE WITNESS: L-Strategies.

3 JUDGE KLUKAS: And you have a copy of the  
4 article?

5 BY MR. DEFILIPPO:

6 Q Did you email it to me?

7 A Yes.

8 MR. DEFILIPPO: Yes, we do, Judge.

9 MR. SMITH: I would --

10 MR. DEFILIPPO: Subject to link that I'll  
11 provide to the Court, Your Honor.

12 MR. SMITH: Yes, Judge. I would like to see  
13 that. We haven't seen that.

14 JUDGE KLUKAS: Okay.

15 BY MR. DEFILIPPO:

16 Q Now, I know there was -- you made some --  
17 you told me some information regarding your Google  
18 account potentially being hacked. Okay?

19 A Yeah.

20 Q When did that happen? How do you know that  
21 it's Mr. Fitzgerald who did it? Give us as much  
22 information about that.

23 A Do you have a picture of it so I can  
24 explain?

25 Q It's been pre-marked as Exhibit 19.

1           A       Okay.  So I did notice here that under the  
2 supplement to the original petition that the date here  
3 is actually incorrect.  It should be not June 8th, but  
4 January 2024.  Can we make that correction?

5                   JUDGE KLUKAS:  Where?

6           MR. DEFILIPPO:  Ask the Court to acknowledge  
7 that.

8                   JUDGE KLUKAS:  What paragraph are you on?

9           MR. DEFILIPPO:  Paragraph 6.

10           THE WITNESS:  Paragraph 6 under Google.  
11 It's a second -- a third line down.

12           JUDGE KLUKAS:  It says incident on June 8th  
13 of '23.  It should be January 8th?

14           THE WITNESS:  January 2024.  Okay.

15           BY MR. DEFILIPPO:

16           Q       So all references to June 7 or June 8, 2023,  
17 that's incorrect.  It should be January 2024?

18           A       That's -- it was definitely in 2024.

19           Q       Okay.  So this one here, number 6, talks  
20 about both the Facebook and now what we're talking  
21 about the potential Google hack?

22           A       Correct.

23           Q       This is only referring to the Google hack or  
24 alleged hack; right?

25           A       Correct.  Correct.  So in January 2024 --

1 JUDGE KLUKAS: Hold on.

2 THE WITNESS: Sorry.

3 JUDGE KLUKAS: Paragraph 6 talks about  
4 Facebook stalking incident of June 7, 2023. I don't  
5 see --

6 MR. DEFILIPPO: That's not being changed;  
7 right? The Facebook --

8 THE WITNESS: Facebook is that --

9 MR. DEFILIPPO: -- that was June 7th, that's  
10 accurate. The Acworth, Georgia, that's referring to  
11 Exhibit --

12 JUDGE KLUKAS: Seventeen.

13 MR. DEFILIPPO: -- 17.

14 JUDGE KLUKAS: That is June 7 of '23.

15 BY MR. DEFILIPPO:

16 Q Is that right? June 7, 2023, from Facebook?

17 A If you want, I can go back and just look at  
18 my files to give you the exact date.

19 Q Well, remember it was on the top left based  
20 on the fact that you changed --

21 A For June for the Facebook one?

22 Q Yes.

23 A Yes, that's correct.

24 Q Okay. Now, we're talking about Google.

25 A For Google, I have to just go back and just

1 double-check on those dates, but it was later. It was  
2 not in June of 2023.

3 Q To the best of your ability, when did the  
4 Google attempted hack occur?

5 A The Google attempt happened later that year,  
6 either 2023 or early 2024. And I will get the Court  
7 the exact date.

8 Q Now, perhaps this would tell you the date  
9 here in the exhibit.

10 A Okay. Right. It -- the screenshot was  
11 taken 12/18/23.

12 Q And what's this screenshot of? This is  
13 Plaintiff's Exhibit for identification Number 19.

14 A It's a little bit long-winded, but it -- on  
15 a Google search page, let's say I googled New York  
16 Times crossword puzzles, at the very, very bottom of  
17 your Google search, it shows your location of where  
18 your IP is pointing to. My Google searches pointed to  
19 Paulding County, Georgia, where the defendant has his  
20 office at 31 Sparks Drive in Paulding, Georgia.

21 I've never been to Paulding, Georgia. I  
22 don't know Paulding, Georgia, but that surprised me  
23 that I was being -- that my everything on my screen  
24 was being pointed to Georgia in Paulding County. I  
25 didn't know what that was about. So I had searched

1 and find out what happens when my past activities and  
2 my location is based in his --

3 MR. SMITH: Your Honor, I would object based  
4 on hearsay. It sounds like she's giving expert  
5 computer testimony. And so I would object based on  
6 foundation, hearsay.

7 JUDGE KLUKAS: Okay. Overruled. Is this  
8 what you observed on your personal Google page?

9 THE WITNESS: Yes.

10 JUDGE KLUKAS: You don't know exactly how  
11 Georgia got on there, but you just know it was there?

12 THE WITNESS: I've never been here, ever in  
13 my entire life. And meanwhile, my computer, my  
14 phones, everything, every Google (crosstalk) --

15 JUDGE KLUKAS: How did you discover that?

16 THE WITNESS: I scrolled down. It was just  
17 scrolling all the way to the bottom of the page.  
18 Usually, it says I'm in Miami, Florida or wherever I'm  
19 --

20 JUDGE KLUKAS: So one day you were just  
21 doing a Google search and you came upon that?

22 THE WITNESS: I guess I was looking to flip  
23 to the next page and meaning, like, page 2 of a Google  
24 search. I don't remember exactly, but I found that.

25 JUDGE KLUKAS: And when you went in, did you

1 correct it?

2 THE WITNESS: I don't know how to correct  
3 it.

4 JUDGE KLUKAS: So to this day, does it still  
5 point to Georgia?

6 THE WITNESS: I got rid of all Google  
7 products from that point forward because I knew he was  
8 spying on me because the only person I know in that  
9 county is him at 31 Sparks Drive.

10 JUDGE KLUKAS: Got it. And you discovered  
11 that one?

12 THE WITNESS: And according to this  
13 screenshot, 12/18/23. And from there, I got very  
14 spooked out and just deleted everything, reset my  
15 phones, reset everything, because I didn't know what  
16 information he was gathering from my laptop, from my  
17 phone, from any sort of -- my Gmail, everything. Even  
18 at work, I had to use Google products, and I told them  
19 I can't do it anymore because I'm worried that he is  
20 tracking my location.

21 So that's what I found, that you can see all  
22 location history by doing this. You can spoof my  
23 phone number by doing this, or my emails. You can use  
24 my email and send it around to people. You can use my  
25 phone number and send around whatever message you want

1 based on this and other things, other IP spywares that  
2 was occurring. And that's why people do this.

3 BY MR. DEFILIPPO:

4 Q Now, I know you said you've never been to  
5 Paulding County, but has your Google account ever been  
6 accessed in Paulding County? From my limited  
7 understanding of how this works with Google, it still  
8 may appear if your account was opened in the location,  
9 you may not have been there, but if your account was  
10 logged in at that location, it still may appear. So  
11 has that ever occurred to your knowledge?

12 A I believe that's how it -- that's how this  
13 screenshot appeared. It was opened in a location, and  
14 it was recorded by Google that I had opened my account  
15 on this location.

16 Q Did you actually give authority to someone  
17 in Paulding County to log into your Google account in  
18 Paulding County at any time?

19 A Absolutely not.

20 MR. DEFILIPPO: At this time, we'd like to  
21 introduce what has been pre-marked as Plaintiff 19 as  
22 Petitioner's 19.

23 MR. SMITH: We object as the foundation and  
24 relevance in that she's not able to testify that it  
25 was Mr. Fitzgerald that accessed her Google account in

1 2023.

2 JUDGE KLUKAS: You printed this printout  
3 out?

4 THE WITNESS: I had given it to my attorney,  
5 correct.

6 JUDGE KLUKAS: From your computer?

7 THE WITNESS: That -- yeah, I mean, I have a  
8 big file on all the stalking. That was one of the  
9 files.

10 JUDGE KLUKAS: Okay. This will be admitted  
11 over objection as Petitioner's 19.

12 COURT CLERK: Judge, I think I pre-marked it  
13 as 19, but I think it -- after the last exhibit, will  
14 be 17.

15 JUDGE KLUKAS: No. Seventeen, we've already  
16 admitted. So then it would be 18.

17 COURT CLERK: Oh, 18 then. Thank you.

18 JUDGE KLUKAS: Okay. So I'll make a note  
19 here. It'll be 18.

20 (EXHIBIT 18 WAS ADMITTED INTO EVIDENCE.)

21 COURT CLERK: Thank you.

22 MR. DEFILIPPO: Thank you, Your Honor.

23 BY MR. DEFILIPPO:

24 Q Okay. So in light of all of this that we've  
25 introduced, all the instances of harassment, please

1 tell the Court what you would like the Court to do for  
2 you, Ms. Wong.

3 A I think that the repeat trauma of this daily  
4 occurrence in my life has really disrupted me and my  
5 family tremendously. I would very much like a full  
6 stay-away order, and for his online activities to be  
7 tracked because I'm not the only victim in this. I'm  
8 very lucky to be able to hire a lawyer to represent me  
9 and have this case.

10 And thank you, Your Honor, for allowing the  
11 time to hear this case out. There are many, many  
12 victims out there who are suffering every day because  
13 of this man. He uses online and publishing tools to  
14 taunt and harass many people who have come forward to  
15 me.

16 MR. SMITH: I would object as to --

17 JUDGE KLUKAS: Other people.

18 MR. SMITH: -- it's other people.

19 JUDGE KLUKAS: Understood. Okay.

20 MR. DEFILIPPO: That -- no further questions  
21 for the petitioner, Your Honor.

22 JUDGE KLUKAS: There are two items that you  
23 mentioned that you have in electronic form, but not --

24 MR. DEFILIPPO: Your Honor, yes. The  
25 retweeted posts from after -- during the pendency of

1 this hearing or this proceeding, Your Honor. I will  
2 get that to you. And it was the --

3 JUDGE KLUKAS: L-Strategies article?

4 MR. DEFILIPPO: The --

5 JUDGE KLUKAS: Or an article posted on L-  
6 Strategies?

7 MR. DEFILIPPO: Right. The L-Strategies  
8 article with the FAFO.

9 THE WITNESS: I think you have the --

10 MR. DEFILIPPO: Yeah, I just want --

11 THE WITNESS: No. FAFO is a different one.  
12 You have the screenshots on your phone.

13 JUDGE KLUKAS: Okay.

14 THE WITNESS: That -- for the L-Strategies.

15 MR. DEFILIPPO: Correct. I just want to  
16 write down and specifically, because I have a lot;  
17 right?

18 THE WITNESS: Right.

19 MR. DEFILIPPO: I want to write down  
20 specifically which ones I need to produce to the  
21 Court.

22 JUDGE KLUKAS: Okay. Okay. If you happen  
23 to have physical copies before we conclude, that would  
24 be great.

25 MR. DEFILIPPO: Yes, Your Honor.

1 MR. SMITH: And, Your Honor, we would object  
2 to evidence as it relates to those based on best  
3 evidence because until they are produced and we have a  
4 chance to see.

5 JUDGE KLUKAS: Agreed. I'm not doing  
6 anything or taking any note of them, but would like to  
7 see them if they are available. Okay. I'm going to  
8 allow the respondent to cross-examine. Do you want  
9 her to sit there?

10 MR. SMITH: No.

11 JUDGE KLUKAS: It's fine there. Okay.

12 MR. SMITH: It's okay.

13 JUDGE KLUKAS: All right. Go ahead, Mr.  
14 Smith.

15 CROSS-EXAMINATION

16 BY MR. SMITH:

17 Q Ms. Wong, you had stated earlier that you've  
18 never been to Georgia. Isn't it true that you took a  
19 bus tour for Trump through the state of Georgia?

20 A I did not say that I had never been to  
21 Georgia. I've been to Georgia multiple times.

22 Q Okay. Isn't it true that you went through  
23 the Atlanta area when you were in that bus tour?

24 A I don't know if I was in Atlanta, but I was  
25 in northern Georgia.

1 Q Okay. And isn't it true that Paulding  
2 County is Northern Georgia?

3 A I don't know.

4 Q Okay. Isn't it true that Acworth is  
5 northern Georgia?

6 A I don't think so.

7 Q Okay. And you actually had an attorney in  
8 the Atlanta area. Did you not?

9 A When?

10 Q During the 2023 lawsuit involving L-  
11 Strategies and Veterans for America First?

12 A He does, but he's not in Paulding, Georgia.

13 Q Okay. And you were actually an officer of  
14 L-Strategies at one point; correct?

15 A I've never seen any documents that say that,  
16 but yes.

17 Q Okay. And L-Strategies is headquartered in  
18 Atlanta, Georgia, is it not?

19 A I don't know anymore.

20 Q Okay. It was at the time -- it was a  
21 Georgia corporation at the time that you were involved  
22 with L-Strategies; correct?

23 A I have not seen a single document that says  
24 that.

25 Q Okay. Was it your understanding that it was

1 a Georgia corporation at the time that you were  
2 involved with L-Strategies?

3 A I don't know.

4 Q Okay. Veterans for America First, you were  
5 also involved in the leadership of that organization  
6 as well; correct?

7 A No, that's not correct.

8 Q Okay. So you never were on the board for  
9 Veterans for America First?

10 A Mr. Fitzgerald listed me as a Florida State  
11 Chapter head, and I told him, "Take off my  
12 information." He published my personal information on  
13 his website for his own perusing. When I asked him to  
14 take it all down, I don't -- I'm not a veteran. I'm  
15 not involved in this organization, but he kept CC-ing  
16 my email with all of his Veterans for America First  
17 stuff.

18 Q So you think that it would be a bad thing  
19 for you to be involved in an organization that --

20 A No.

21 Q -- says Veterans? You don't think that  
22 would be bad?

23 A I am more than happy to support my veteran  
24 and law enforcement community, but not a fake one that  
25 Mr. Fitzgerald had told me over and over again

1 himself, that this organization does not exist, only  
2 in name.

3 Q Okay. So at one point you -- in your  
4 background information that you gave at the beginning  
5 of this case, you said you were in business with Mr.  
6 Fitzgerald; correct?

7 A Correct.

8 Q Okay. Can you tell me the timeframe in  
9 which you were in business with Mr. Fitzgerald?

10 A It would be the end of 2022 until the time I  
11 had discovered that they are complete frauds and  
12 criminals around spring of 2023.

13 Q Okay. And during that period of time, you  
14 were involved with both L-Strategies and Veterans for  
15 America First; is that correct?

16 A Again, Veterans for America First was a  
17 complete fabrication.

18 Q Okay.

19 A So no. I was not involved in a fabricated  
20 organization.

21 Q Now, you testified earlier that Mr. Conz  
22 hired a private investigator that did an investigation  
23 on Mr. Fitzgerald; correct?

24 A Yes.

25 Q And that's been recently?

1           A     You would have to ask him.

2           Q     Okay.  Isn't it true that the private  
3 investigator that he hired was actually Patrick  
4 Collis?

5           A     I wouldn't know.

6           Q     Okay.  Has Mr. Conz told you that it was --  
7 who the private investigator was?

8           A     No.

9           Q     Okay.  So you had testified that your tires  
10 were slashed multiple times between June of 2023 and  
11 August of 2023; correct?

12          A     It was immediately after Mr. Fitzgerald and  
13 Jared Craig harassed me and tried to make me sign an  
14 NDA.

15          Q     I'm asking about the timeframe.  Was it June  
16 of 2023 to August of 2023?

17          A     It was immediately after all the harassing  
18 emails.  So yes, it was June of 2023 to around August  
19 of 2023.  I have photos.

20          Q     Okay.  And -- but you never obtained the  
21 camera from the apartment complex; correct?

22          A     I believe the police were investigating  
23 that, so I left it to them to obtain all that footage  
24 because I myself could not.  It would have to go  
25 through Miami PD.

1 Q And this put you under extreme emotional  
2 distress?

3 A Someone was tampering with my life and my  
4 children's life.

5 Q But you did not file for an injunction until  
6 October of 2024?

7 A I did file for an injunction as this Court -  
8 - in this very Court.

9 Q When was that?

10 A If this Court would pull up my records, they  
11 can get the exact date, but it was around the time of  
12 the tire incidents. So yes, I did file.

13 Q And so it was declined?

14 A I don't know. It was under -- because Mr.  
15 Fitzgerald and I were not domestic partners, I believe  
16 was the reason.

17 MR. SMITH: Okay. Now, you -- in -- let's  
18 see. Petitioner's Exhibit 1, there was a email in  
19 which you claim that you were doxed. And, Your Honor,  
20 did -- are the exhibits available, or would you --

21 JUDGE KLUKAS: They're right here. Just  
22 keep them in order.

23 MR. SMITH: May I? Yes.

24 JUDGE KLUKAS: Of course.

25 MR. SMITH: Thank you. I'll see all this.

1 BY MR. SMITH:

2 Q So this has been marked as Petitioner's  
3 Exhibit 1. It is an email from a  
4 angiewongccp@proton.me. And I'm going to show this to  
5 you. Can you look at that? And you had testified  
6 earlier that it -- that this email had published your  
7 home address; is that correct?

8 A Correct.

9 Q And that was very disturbing to you?

10 A That was very disturbing to me that my home  
11 address where my children and I live were published to  
12 thousands of people by Mr. Fitzgerald. Yes, it was.

13 Q And that was -- what was the date again of  
14 that email?

15 A 4/13/24.

16 Q So April of 2024. And next to the address  
17 there, what is the parenthetical statement? What does  
18 it say directly after that address?

19 A It says "False address on DL," which tells  
20 me that Mr. Fitzgerald tried to access my home.

21 Q But the document itself purports that the  
22 address listed is a false address; is that correct?

23 A Only to Mr. Fitzgerald.

24 Q Okay. All right. I can see that back of  
25 the page. And as we sit here today, you still don't

1 know who created the web -- the email address  
2 angiewongccp@proton.me?

3 A We had Miami PD look into this matter, and  
4 it was tied to Mr. Fitzgerald, forgetthegouge@aol.com.

5 MR. SMITH: Objection.

6 THE WITNESS: Well, I'm answering your  
7 question.

8 MR. SMITH: Objection. Calls for a response  
9 based on hearsay.

10 THE WITNESS: I spoke with the detective.

11 BY MR. SMITH:

12 Q Okay. But the detective isn't here today to  
13 testify to that; correct?

14 A We can get him.

15 MR. SMITH: Okay. All right. I'm going to  
16 show you what's been marked Defendant's -- or I'm  
17 sorry, Petitioner's Exhibit 2. Can you --

18 JUDGE KLUKAS: What was that last exhibit?  
19 The email? Mr. Smith?

20 MR. SMITH: It was the email from  
21 angiewongccp --

22 JUDGE KLUKAS: Exhibit number?

23 MR. SMITH: -- @proton.me. It's Number 1.

24 JUDGE KLUKAS: Okay.

25 MR. SMITH: Petitioner's 1.

1 BY MR. SMITH:

2 Q And again, Petitioner's 2 is again from  
3 angiewongccp@proton.me; correct?

4 A The one that Stan Fitzgerald created? Yes.

5 Q I'm asking about Petitioner's Exhibit 2 is  
6 from angiewongccp@proton.me; correct?

7 A That's correct.

8 Q Okay. And again, you were upset because it  
9 listed your home address, the 68 Southeast 6th Street,  
10 Apartment 3904, Miami, Florida. What is the  
11 parenthetical statement after that address in that  
12 email?

13 A "Allegations of money laundering, wire  
14 fraud, embezzlement, filing false FEC reports."

15 Q Ms. Wong, I'm not asking about that. I'm  
16 asking about the parenthetical statement that directly  
17 follows the address, 68 Southeast 6th Street.

18 A I'm reading it after the address. It says,  
19 "Allegations, money laundering, wire fraud,  
20 embezzlement, filing false FEC reports,  
21 misappropriating political action funds, conspiring to  
22 file false FBI reports," things that he himself did,  
23 "and possible prostitution."

24 Q Can I see that please and point out to you  
25 where I'm talking about? If you look at the

1     parenthetical statement directly following your  
2     address or maybe your address -- what is the  
3     parenthetical saying --

4             A     According to Stan Fitzgerald, he's saying --  
5     claiming that this is a false address of mine. Now,  
6     this is a stalking case.

7             Q     Okay.

8             A     I just want to remind you, and you're trying  
9     to get me to clarify that? Where I live with my  
10    children?

11            Q     And what was the date of this email? I'm  
12    sorry. I forgot to ask you that. Can you tell me?

13            A     The date Mr. Fitzgerald created an account  
14    called angiewongccp@proton.me, it was sent at 10:43  
15    a.m., April 15, '24.

16            Q     April 15, 2024. Okay. Thank you. And that  
17    was disturbing to you that he -- allegedly that  
18    someone under angiewongccp@proton.me published your  
19    address; correct?

20            A     It put my life in danger.

21            Q     And then I'm going to show you what's been  
22    marked as Petitioner's Exhibit 3. And again, it's  
23    another email from angiewongccp@proton.me. Can you  
24    tell me what date that was sent?

25            A     April 25, '24. All within days of each

1 other. It was nonstop harassment by Mr. Fitzgerald.

2 Q And is the parenthetical statement following  
3 the address -- does it also say false address on DL?

4 THE WITNESS: Can we be reminded that this  
5 is a stalking case?

6 JUDGE KLUKAS: Ms. Wong, just answer the  
7 question.

8 THE WITNESS: He's trying to say a fantasy  
9 of Mr. Fitzgerald that it's a false address.

10 BY MR. SMITH:

11 Q So does it say -- the parenthetical  
12 statement says false address following the Southeast  
13 6th Street address?

14 A What does this have to do with a -- yeah, I  
15 mean, that's what he wrote.

16 Q And this was an email sent in April of 2024;  
17 correct?

18 A (Inaudible).

19 Q I'm going to show you -- I can mark this as  
20 Respondent's Exhibit 2. Can you tell me what that is?

21 MR. DEFILIPPO: I'm going to object, Your  
22 Honor. Just for the record, I was not given a list of  
23 defendant's exhibits. The exhibits that defendant --  
24 the respondent claimed that they would be admitting  
25 only petitioner's exhibits. This seems to be

1 something brand new.

2 MR. SMITH: So there have been other  
3 exhibits that I haven't received from counsel, but  
4 Your Honor, this is also a matter of public record,  
5 and it is a complaint filed by Ms. Wong.

6 JUDGE KLUKAS: Okay.

7 MR. DEFILIPPO: Objection stand as --

8 JUDGE KLUKAS: Overruled.

9 BY MR. SMITH:

10 Q Ms. Wong, can you tell me what that is?

11 A Again, I haven't looked at it. So I would  
12 have to read this. And given that the defendant has a  
13 long history of forgery and fraud, I have to really  
14 look at this.

15 Q Do --

16 JUDGE KLUKAS: What do you purport it to be,  
17 Mr. Smith?

18 MR. SMITH: It is the complaint for  
19 defamation filed in Palm Beach County in October of  
20 2023 against Mr. Fitzgerald, Mr. Craig, and Mr.  
21 Collis.

22 JUDGE KLUKAS: Okay. Ms. Wong, you filed  
23 the case in Palm Beach County for defamation?

24 THE WITNESS: That is correct.

25 JUDGE KLUKAS: Okay.

1 THE WITNESS: I just want to make sure that  
2 this -- again, with anything coming from that side, I  
3 have to be clear --

4 JUDGE KLUKAS: Okay. Understanding that we  
5 can't verify page by page that that is the exact  
6 complaint, you did file a complaint in --

7 THE WITNESS: Yes.

8 JUDGE KLUKAS: -- Palm Beach County. Okay.

9 THE WITNESS: Okay.

10 MR. SMITH: And --

11 JUDGE KLUKAS: And that you're submitting  
12 that as Respondent's Exhibit --

13 MR. SMITH: Exhibit 2.

14 JUDGE KLUKAS: Okay. That'll be admitted as  
15 Respondent's B; correct?

16 COURT CLERK: Judge, this is the first  
17 exhibit. Will be --

18 JUDGE KLUKAS: No. He admitted something  
19 last time.

20 COURT CLERK: Okay. So this will be B,  
21 okay. Respondent's Exhibit B.

22 JUDGE KLUKAS: Respondent's A.

23 (EXHIBIT A WAS ADMITTED INTO EVIDENCE.)

24 MR. DEFILIPPO: On the record, Judge, over -

25 -

1 JUDGE KLUKAS: Understand it's over  
2 objection.

3 THE WITNESS: Okay.

4 JUDGE KLUKAS: Was something used to cross-  
5 examine --

6 MR. SMITH: Mr. Collis?

7 JUDGE KLUKAS: -- Mr. Collis, but I didn't  
8 make a note. It should be in the file. If we don't  
9 have it, that's --

10 MR. SMITH: It's in the --

11 JUDGE KLUKAS: It's in the stack?

12 MR. SMITH: -- exhibit list, Judge, as the  
13 last three-page Spartan Investigations Incorporated.  
14 It was marked as Defendant's A.

15 JUDGE KLUKAS: Okay. And we admitted it.  
16 It should be in there. Okay.

17 BY MR. SMITH:

18 Q Now, Ms. Wong, attached to your complaint  
19 that you filed in Palm Beach County in October of 2023  
20 is in Exhibit A; correct?

21 A Is in Exhibit A. Can you show me?

22 Q Yes. Your counsel marked it as Exhibit A  
23 and attached it to the complaint.

24 A I'm not sure.

25 Q You -- as you sit here today, you don't know

1 the complaint that you filed in Palm Beach County?

2 A I do know the complaint that I filed, but  
3 I'm not sure if it's Exhibit A.

4 Q Okay. Well, can you turn to page 2 of what  
5 I've just -- the next page?

6 A Yep.

7 Q Do you see the second -- sorry. I guess  
8 it's the third paragraph. That third paragraph there,  
9 does it contain the same address that is in the 2024  
10 emails that upset you?

11 A This is an investigation by Spartan  
12 Investigation. That's Patrick Collis. This is his  
13 report, so what's -- why would -- I'm sorry. I don't  
14 understand your question.

15 Q Well, I guess what I'm trying to say is,  
16 didn't you attach that to your complaint that you  
17 filed in 2023, thereby publishing as a matter of  
18 public record this very same address?

19 A I don't remember if this is Exhibit A at  
20 all.

21 MR. SMITH: I would ask the Court to take  
22 judicial notice of the Palm Beach County complaint  
23 that's on the Palm Beach County docket. That is a  
24 true and accurate representation of what was filed and  
25 so --

1 THE WITNESS: Yeah, it's redacted, so I'm  
2 not sure.

3 BY MR. SMITH:

4 Q Yes, the -- would you agree that those are  
5 the phone numbers redacted; correct?

6 A I can't see it. It's redacted.

7 Q Okay. But the address of 68 Southeast 6th  
8 Street, Apartment 3904 is in fact on that Exhibit A?

9 A It doesn't excuse your client from doxing  
10 me.

11 Q Okay. That's all.

12 A And sending it to thousands of people.

13 MR. SMITH: Would like to tender --

14 JUDGE KLUKAS: Yep.

15 MR. SMITH: -- Respondent's Exhibit B.

16 JUDGE KLUKAS: Grab it.

17 MR. SMITH: I'm not -- Judge, do you want me  
18 to mark them as they're tendered or --

19 JUDGE KLUKAS: As they're admitted.

20 (EXHIBIT B WAS ADMITTED INTO EVIDENCE.)

21 MR. SMITH: As they're admitted. Yes,  
22 Judge.

23 JUDGE KLUKAS: So you want to maybe attach  
24 it with a clip so we keep them in order.

25 BY MR. SMITH:

1 Q So we already established that these 2024  
2 emails were sent in April, May of 2024; correct?

3 A May? I don't remember May.

4 Q So you think -- so they were sent in April  
5 of 2024?

6 A The ones that you had just shown me were all  
7 in April.

8 Q Okay. And you filed for your injunction in  
9 October of 2024?

10 A The second time? Yes.

11 Q Okay. Now, isn't it true that you have a  
12 lot of enemies; correct?

13 MR. DEFILIPPO: Objection.

14 JUDGE KLUKAS: Sustained.

15 THE WITNESS: Well --

16 JUDGE KLUKAS: Be more specific.

17 BY MR. SMITH:

18 Q Isn't it true that there would be other  
19 people who would want to perhaps say bad things about  
20 your life?

21 MR. DEFILIPPO: Objection. Calls for  
22 speculation.

23 JUDGE KLUKAS: Sustained.

24 BY MR. SMITH:

25 Q Okay. Isn't it true that -- do you know a

1 Mr. Gavin Wax?

2 A It's someone that Stan Fitzgerald had turned  
3 against me. Yes.

4 Q Okay. And did Gavin Wax run for political  
5 office?

6 MR. DEFILIPPO: Objection. Relevance.

7 JUDGE KLUKAS: Overruled.

8 THE WITNESS: I have no idea.

9 BY MR. SMITH:

10 Q Okay. Isn't it true that Gavin Wax used to  
11 refer to you as Wong CCP?

12 A I have no idea.

13 Q You don't -- you have absolutely no idea  
14 whatsoever?

15 A I know that Mr. Fitzgerald had a  
16 conversation with Gavin Wax where, with many of my  
17 contacts, he turned them against me and turned them  
18 into my enemies by giving them falsehoods. So he had  
19 a conversation with Mr. Wax to turn him against me and  
20 try to use it as evidence, which was completely false.

21 Q But isn't it true that you knew that Mr. Wax  
22 referred to you as CCP?

23 A How do I know that?

24 MR. SMITH: Okay. May I show the witness?

25 JUDGE KLUKAS: Yes.

1 BY MR. SMITH:

2 Q I'm show you a document here. Do you  
3 remember sending that text message, Ms. Wong?

4 A No.

5 Q You don't remember that text message?

6 A Again, anything -- I haven't seen this.  
7 This was not given to my attorney. I have no idea if  
8 this is entirely fabricated. Again, this -- your  
9 client is the king of forgeries.

10 JUDGE KLUKAS: Ms. Wong, I need you to  
11 respond.

12 THE WITNESS: No.

13 MR. DEFILIPPO: And just to repeat my  
14 client's objection, and I -- no idea what this is. I  
15 don't know if this really is from Ms. Wong or not. Do  
16 you have more question for her?

17 MR. SMITH: Your Honor, I would say that it  
18 is a text message from Ms. Wong. It has her response  
19 to it so I would like to tender that as Respondent's  
20 Exhibit C.

21 JUDGE KLUKAS: Objection for the record,  
22 your response?

23 MR. DEFILIPPO: Hearsay, Judge. I don't  
24 know -- this is an out-of-court statement being  
25 offered for the truth of the matter asserted right

1 now. Objecting to hearsay, also lack of foundation.

2 JUDGE KLUKAS: All right. That's sustained.  
3 Move on, Counsel.

4 BY MR. SMITH:

5 Q So, Ms. Wong, you would say as you sit here  
6 today that you did not know that Gavin Wax referred to  
7 as CCP?

8 A I believe Mr. Fitzgerald had told a lot of  
9 people, thousands of people, and published it to  
10 millions of people that I'm CCP. So yes, a lot of  
11 people right now believe that I'm Chinese Communist  
12 Party because of his constant intimidation,  
13 harassment, and publishing it on Associated Press and  
14 Fox News, and trying to publish it on Newsmax that I'm  
15 CCP. So yes, a lot of people think that because of  
16 your client.

17 Q Okay. So, Ms. Wong, isn't it true that in  
18 2023 and 2024, you were involved in a lawsuit against  
19 Mr. Peter Baker?

20 A It was not a lawsuit.

21 Q Well, you were trying to get an injunction  
22 against Mr. Peter Baker; is that correct?

23 A I was trying -- well, I was successful in  
24 getting an injunction -- a full restraining order on  
25 Peter Baker because Mr. Fitzgerald and Peter Baker

1 were discussing online some sexual tapes about me.

2 Q So you would agree that in 2024, the New  
3 York Court entered a injunction against Mr. Peter  
4 Baker?

5 A I believe all those documents are sealed  
6 because it was a domestic violence case.

7 MR. SMITH: Can I show you a document?

8 JUDGE KLUKAS: Go ahead.

9 THE WITNESS: I'm sorry. What's your  
10 question?

11 BY MR. SMITH:

12 Q My question is, is that an injunction that  
13 you received against Mr. Baker in New York?

14 A I'm just looking for a date on this. Is  
15 there a date?

16 Q Yes.

17 A Is there more to this? Because this looks -  
18 -

19 Q There is a date. If you look just below the  
20 bold line.

21 A Right. So shortly after I discovered that  
22 Mr. Fitzgerald and Peter Baker were having  
23 conversations about suing me and buying sexual tapes  
24 about me from when I was in college, they were  
25 discussing a number. I had filed in a New York

1 domestic violence court to get an injunction on both  
2 these men, if I can call them that. I was successful  
3 with Peter Baker because he was an ex-boyfriend of  
4 mine, but I was not successful with Mr. Fitzgerald  
5 because we were not domestic partners. But I had  
6 filed against both of them.

7 MR. SMITH: Like to tender that as  
8 Respondent's Exhibit -- I think this is C.

9 JUDGE KLUKAS: Okay. Any objection?

10 MR. DEFILIPPO: No objection, Your Honor.

11 JUDGE KLUKAS: All right. It'll be admitted  
12 as Respondent's C without objection.

13 (EXHIBIT C WAS ADMITTED INTO EVIDENCE.)

14 MR. DEFILIPPO: Here's the --

15 JUDGE KLUKAS: Okay. And put the little  
16 (inaudible).

17 MR. DEFILIPPO: Here's the -- I'm sorry.

18 BY MR. SMITH:

19 Q And, Ms. Wong, isn't it true that you are  
20 currently involved in a lawsuit with your mother?

21 A My mother passed away.

22 MR. DEFILIPPO: Object to relevance on this  
23 one.

24 MR. SMITH: Judge, the relevance is that she  
25 is -- claims that she's certain that my client created

1 angiewongccp@proton.me. And so we're trying to  
2 establish that there are many people that would have  
3 been motivated to do so.

4 JUDGE KLUKAS: I understand. When did the  
5 petitioner's mother pass away?

6 MR. DEFILIPPO: When did your mom pass away?

7 THE WITNESS: In 2024.

8 JUDGE KLUKAS: Okay.

9 BY MR. SMITH:

10 Q So isn't it true that prior to your mother's  
11 passing, you had named her on a lawsuit?

12 A I don't see the relevance, but yeah. We  
13 were in the estate case, I'm the estate -- I am the  
14 executor for my father's will.

15 Q And that you had also named your sister and  
16 your brother in a lawsuit?

17 MR. DEFILIPPO: Judge, I want to object  
18 seeing that this was a probate matter.

19 THE WITNESS: Yeah.

20 MR. DEFILIPPO: That has nothing to do with  
21 these allegations. Object to relevance.

22 JUDGE KLUKAS: Okay.

23 MR. DEFILIPPO: And harassment.

24 JUDGE KLUKAS: Okay. I'll overrule that. I  
25 understand what the respondent's counsel is trying to

1 do. And I think it's relevant given that many of the  
2 allegations don't have specific -- don't specifically  
3 point to Mr. Fitzgerald. It's a lot of circumstantial  
4 information. So I will allow it. Go ahead.

5 BY MR. SMITH:

6 Q So isn't it true that you named your sister  
7 and your brother in that lawsuit as well?

8 A It was -- again, I was trying to gain  
9 relevant documents to administer my father's estate,  
10 and they were withholding it from me. My mother does  
11 not even know how to turn on a computer, so it would  
12 not be from her. She's never had an email. And all  
13 IP addresses relate angiewongccp@proton.me to Mr.  
14 Fitzgerald.

15 MR. SMITH: Your Honor --

16 BY MR. SMITH:

17 Q So -- and isn't it true that you also named  
18 in a malpractice action, a law firm in New York; is  
19 that correct?

20 A Again, she --

21 MR. DEFILIPPO: Relevance, Judge.

22 JUDGE KLUKAS: Who did you name?

23 MR. DEFILIPPO: (Crosstalk) --

24 JUDGE KLUKAS: Yeah, who did you name, Mr.  
25 Smith? Who?

1           MR. SMITH: A law firm in New York. There's  
2 also a lawsuit from malpractice against an entire --  
3 an attorney and an entire law firm.

4           JUDGE KLUKAS: Okay. All right. Overruled.  
5 You can answer.

6           THE WITNESS: Again, the detective pointed  
7 all the IP addresses --

8           JUDGE KLUKAS: Ms. Wong, please answer the  
9 question.

10          THE WITNESS: What was the question?

11          BY MR. SMITH:

12          Q     Isn't it true that you also sued an attorney  
13 and an entire law firm in New York?

14          A     I had sued the attorney because I was being  
15 withheld estate documents from administrating the  
16 estate properly. Yes.

17          Q     And that is actually scheduled to go to  
18 trial -- is it next week?

19          A     No.

20          Q     Okay. But it's still pending?

21          A     I think that case is pretty much closed at  
22 this point.

23          Q     Okay. Let's see. Are you familiar with a  
24 Eva Violante?

25          A     No.

1 Q You don't remember being involved in -- I  
2 think it was 2022 in a lawsuit with a Eva Violante?

3 A How do you spell the name?

4 Q V-I-O-L-A-N-T-E, involving a dog.

5 A Oh.

6 MR. DEFILIPPO: Object to relevance, Judge.

7 THE WITNESS: It's crazy.

8 BY MR. SMITH:

9 Q Okay. Well, I mean, were you involved in a  
10 lawsuit in which someone alleged that you kidnapped  
11 their dog and took the dog to Florida?

12 A There was a young woman --

13 JUDGE KLUKAS: It's overruled. You can  
14 answer.

15 THE WITNESS: Okay. There -- I -- this was  
16 a case involving NYPD where a woman accused me of  
17 stealing her dog. At the end of the day, NYPD found  
18 no wrongdoing whatsoever, and she took it to the civil  
19 case, which I won.

20 MR. SMITH: Okay.

21 MR. DEFILIPPO: Judge, the answer -- I'm  
22 going to object again and move to strike that exchange  
23 regarding a dog in New York as to it not being  
24 relevant.

25 JUDGE KLUKAS: Okay. Overruled.

1 BY MR. SMITH:

2 Q And, Ms. Wong, isn't it true that there is  
3 currently a lawsuit pending against you by Ms.  
4 Christie Tasker?

5 A Ms. Christie Tasker, who is a witness of  
6 yours, filed a lawsuit that has no merits two days  
7 before our first hearing.

8 JUDGE KLUKAS: Before this hearing?

9 THE WITNESS: This? No. Our first hearing  
10 on Feb -- he -- she filed it on February 12th before  
11 she knew of 2025.

12 JUDGE KLUKAS: Okay.

13 BY MR. SMITH:

14 Q And I guess, how do you know Ms. Tasker?

15 A I won a race against her in 2024. She was  
16 my opponent.

17 JUDGE KLUKAS: For the REC?

18 THE WITNESS: Correct. And again, I won  
19 against her, and now she is the National Press  
20 Secretary for his fake Veterans for America First.

21 MR. DEFILIPPO: Who's his?

22 THE WITNESS: Mr. Fitzgerald, who is also  
23 here to harass and taunt me locally. I had listed her  
24 name in the petition for this very hearing. She's an  
25 agent for Mr. Fitzgerald.

1 BY MR. SMITH:

2 Q So you believe that Ms. Tasker also taunts  
3 and harasses you?

4 A It's Mr. Fitzgerald using his pawns to  
5 harass me everywhere.

6 Q Isn't it true that you and Ms. Tasker are  
7 co-committee chairpersons?

8 A No. I won the race against her.

9 Q So it is your testimony that she did not win  
10 that race at all?

11 A I don't know. She claims to be the  
12 committee woman, but I haven't seen her.

13 Q Okay.

14 JUDGE KLUKAS: Are you officially the  
15 committee woman or Tasker?

16 THE WITNESS: I am.

17 JUDGE KLUKAS: What suit did she file  
18 against you?

19 THE WITNESS: I have no idea. I haven't  
20 been served yet.

21 JUDGE KLUKAS: Okay.

22 BY MR. SMITH:

23 Q Okay. And in 2023, I showed you the  
24 defamation lawsuit. Isn't it true that you also named  
25 Jared Craig in that lawsuit?

1 A Correct.

2 Q And you also named Patrick Collis in that  
3 lawsuit?

4 A Correct.

5 Q And in fact, you said that both Jared Craig  
6 and Patrick Collis were also harassing you?

7 A Correct.

8 Q Okay. And you had testified in the last  
9 hearing about a Gloria Kins. Did you -- you had said  
10 that you all were dear friends; is that right?

11 A We still are.

12 Q You still are. Did you at one point ask Mr.  
13 Craig to send a cease-and-desist letter to Ms. Kins?

14 A I never did that. Ever.

15 Q You -- so you did not -- your testimony is  
16 that you did not ask -- you don't recall communicating  
17 with Mr. Craig regarding sending Ms. Kin's a cease-  
18 and-desist letter?

19 MR. DEFILIPPO: Object to relevance  
20 (inaudible).

21 JUDGE KLUKAS: I apologize. I'm going to  
22 sustain that. She already answered the question that  
23 she did not.

24 BY MR. SMITH:

25 Q I'm going to show you a document here, Ms.

1 Wong.

2 A Again, everything -- I have not seen this.  
3 My attorney has not seen this prior to. You have  
4 plenty of time to introduce exhibits to me in advance.  
5 I have no idea if this is fraudulent or not.

6 MR. DEFILIPPO: Answer the question. Is  
7 there a question regarding this?

8 BY MR. SMITH:

9 Q Yes. Isn't that a text exchange between you  
10 and Mr. Collis asking him to investigate Ms. Kins?

11 MR. DEFILIPPO: Judge, in light of that  
12 question, I'm going to object to hearsay, lack of  
13 foundation, and it also appears to be material  
14 alterations to this document.

15 JUDGE KLUKAS: What does that document  
16 purport to be, Mr. Smith?

17 MR. SMITH: It's a text exchange between Mr.  
18 Collis and Ms. Wong relating to Ms. Kins.

19 JUDGE KLUKAS: Okay. I'm going to -- no.  
20 I'm going to over -- I'm going to sustain the  
21 objection. Mr. Collis could have been questioned  
22 about that while he was on the stand.

23 MR. DEFILIPPO: Yeah. Evidence. Okay. She  
24 put in evidence.

25 MR. SMITH: If I could have just a second,

1 Judge, that there's actually a text message that is  
2 already in the -- in evidence. There it is.

3 BY MR. SMITH:

4 Q I'm going to show you what's already been  
5 marked as Petitioner's Exhibit 11 that you had  
6 tendered into evidence in the last hearing.

7 A This is something that was produced by Mr.  
8 Fitzgerald. So I don't know where he got that  
9 screenshot. This is not from me. This is submitted  
10 by my lawyer, but this exact screenshot is produced by  
11 the defendant.

12 Q So you --

13 A So he falsifies --

14 MR. DEFILIPPO: Wait for the question.

15 BY MR. SMITH:

16 Q So you're saying that you submitted a  
17 document that the text contained therein is not what  
18 it purports to be?

19 A Mr. Fitzgerald cuts and paste and produces  
20 his own evidence over and over again. He is the one  
21 who pushed out this press release to millions of  
22 people. I did not publish this document. He did.  
23 I'm using it as my exhibit to show the harassment, the  
24 constant harassment that he pushes out online.

25 Q Put back in order. You had testified

1 earlier about the photo of you wearing a beret -- red  
2 beret in front of Mao?

3 A It's an Andy Warhol.

4 Q Say that again.

5 A It's from a very famous artist named Andy  
6 Warhol.

7 Q Okay. The painting of Mao, is that --

8 A A painting by Andy Warhol.

9 Q Okay. Is it -- is that the painting that --  
10 I'm asking you, is it the painting of Mao that you're  
11 referring to as the Andy Warhol -- I'm sorry. I'm not  
12 familiar with Andy Warhol. Is that an Andy-Warhol  
13 portrait?

14 A What's the question?

15 Q I'll show you Petitioner's Exhibit 14. And  
16 you had admitted that, and you had said that Mr.  
17 Fitzgerald actually generated that using AI in the  
18 last hearing, didn't you?

19 A Can I get a transcript from what I said?

20 JUDGE KLUKAS: That's what I have.

21 THE WITNESS: Mr. Fitzgerald portrayed me as  
22 a Chinese spy using a photo of me standing in front of  
23 an Andy Warhol painting.

24 BY MR. SMITH:

25 Q But you stated in your petition that Mr.

1 Fitzgerald has generated photos of you using AI and  
2 that's what you produced.

3 A There was more than one photo that was  
4 generated by AI that was produced by Mr. Fitzgerald.

5 Q Okay. So you're saying now that that is an  
6 authentic photograph?

7 A No, I'm not. Don't put words in my mouth.  
8 This is not me. This is not -- this is an AI-  
9 generated photo of me.

10 JUDGE KLUKAS: So there is an Andy Warhol  
11 painting of Mao?

12 THE WITNESS: Correct.

13 JUDGE KLUKAS: Did you ever take a picture  
14 in front of that painting of Mao?

15 THE WITNESS: It was an AI-generated photo.

16 JUDGE KLUKAS: So the answer is no?

17 THE WITNESS: No. But it's a very famous  
18 painting.

19 BY MR. SMITH:

20 Q Were you ever wearing a red beret posing for  
21 a photo?

22 A I was with Curtis Sliwa, who is running for  
23 New York City mayor. That is his hat that he wears on  
24 the campaign. He's famous for wearing a red beret.  
25 He's part of the Guardian angels that protects New

1 York City subways. He's been wearing that hat since  
2 the 1970s. CCP operatives do not wear hats.

3 Q Okay. And you would agree that that photo  
4 first surfaced in 2021; is that correct?

5 A I have no idea.

6 Q Do you know Mr. Loeb?

7 A I know many Mr. Loeb's.

8 Q Okay. Well, Petitioner's 14 has a date  
9 under the photograph for -- of August 30, 2021. Are  
10 you familiar -- have you seen this before?

11 A Let me see. I failed to see where it says  
12 any names -- Mr. Loeb.

13 Q Down, if you look August --

14 A I see -- Scott Davis NYC.

15 Q Do you know a Scott Davis NYC?

16 A I do. He's a famous PR person. I mean, not  
17 PR. Graphic designer.

18 Q And would you agree that the date on that  
19 photo is 2021?

20 A I don't see any dates, but my eyes are --  
21 2021.

22 Q Okay. Thank you. So if you didn't meet Mr.  
23 Fitzgerald until 2022, it is highly unlikely that he  
24 generated an AI photo of you in 2021; correct?

25 A Well, I know that image that you just showed

1 me is an Issuewire article, and that Mr. Fitzgerald is  
2 known for his forgeries. In fact, he is one of the  
3 top forgers in US history according to Operation  
4 Bullpen. So I don't know if that photo is actually  
5 authentic because it was issued by Issuewire where he  
6 had purchased the PR generator to blast it everywhere.  
7 So he created that entire image that you just showed  
8 me.

9 Q Now, the telephone numbers that were listed  
10 in Petitioner's Exhibit 2, 3, and 4, those were the  
11 emails from angiewongccp. You agree that you had  
12 given those phone numbers to other individuals;  
13 correct?

14 A I don't know which phone numbers you're  
15 referring to.

16 Q Specifically, the phone number ending in  
17 4600.

18 A What's the question?

19 Q Had you given that phone number to other  
20 individuals?

21 A Have I given that phone number to other  
22 individuals?

23 Q Yes.

24 A What does that mean?

25 Q Have you given that phone number to someone

1 other than Stan Fitzgerald?

2 A To hundreds of people that I give phone  
3 numbers to.

4 Q Okay. And then there's also a (305) 336-  
5 1807. Isn't it true that you gave that phone number  
6 as an alternate phone number?

7 A That's my daughter's phone number.

8 Q My question is though, isn't it true that  
9 you've given that phone number as an alternate phone  
10 number?

11 A I don't believe so.

12 Q Is it possible?

13 A I wouldn't give my daughter's phone number  
14 who was ten at the time to people.

15 Q Okay. But you said you don't believe so.  
16 So is it possible?

17 A How about no.

18 Q Okay. Ms. Wong, you had testified earlier  
19 that you were starting a political consulting business  
20 in 2020; is that right?

21 A That's incorrect.

22 Q Okay. When did you start the political  
23 consulting business?

24 A I never did.

25 Q You never did? When did you get involved in

1 political consulting?

2 JUDGE KLUKAS: The -- let's back up for a  
3 second. Your daughter's phone number is the one  
4 ending in what?

5 THE WITNESS: I had gotten rid of it as soon  
6 as Mr. Fitzgerald published it so --

7 JUDGE KLUKAS: It was ending in what?

8 THE WITNESS: I would have to go back and  
9 look.

10 JUDGE KLUKAS: You don't remember?

11 THE WITNESS: I just know it was a 305  
12 number.

13 JUDGE KLUKAS: Okay. That's fine.

14 THE WITNESS: I think it was 18 something,  
15 but I can't remember.

16 JUDGE KLUKAS: Okay. Keep going.

17 THE WITNESS: But she was ten.

18 BY MR. SMITH:

19 Q Okay. So when did you -- and didn't you  
20 testify in the previous hearing that both of those  
21 phone numbers listed in those angiewongccp@proton.me,  
22 that both of those phone numbers were your children's  
23 phone numbers?

24 A Well, I'm the parent, and they're underaged,  
25 yes. Those are phone numbers belonging to my kids.

1 Q But isn't it true that you've used the 4600  
2 number as your business number?

3 A When Stan Fitzgerald tried coming after me  
4 and publishing all these fake documents, I switched my  
5 phone number.

6 MR. SMITH: I'll show you -- I'm going to  
7 show you a document here.

8 JUDGE KLUKAS: How many times have you had  
9 to switch your phone numbers as a result of all of  
10 this?

11 THE WITNESS: I couldn't begin to tell you.  
12 Well, my kids, my husband, all of us, we switched our  
13 phone numbers when we were being harassed, and I've  
14 had to switch my number every couple of months for the  
15 last two years. Under ten. I -- and again, my  
16 attorney has my new number. I only give it to safe --  
17 people that I feel safe with.

18 BY MR. SMITH:

19 Q Ms. Wong, do you remember forming a Restore  
20 Integrity PAC?

21 A I -- yes.

22 Q And isn't it true that when you form a PAC  
23 you have to fill out a form called an FEC Form 1?

24 A I did not fill that form out. It was done  
25 by someone else.

1 Q Do you believe that someone else filled out  
2 this form without your authorization?

3 A No. I gave her my authorization.

4 Q Did you also give her one of those phone  
5 numbers?

6 A She had an old business card of mine, yes.

7 Q Okay. So I'm going to show you document  
8 here. Does that look like the FEC Form 1 for Restore  
9 Integrity PAC?

10 A Yes. A woman in Illinois filled it out for  
11 me using my old information from my old business card.

12 Q And that contains, as a matter of public  
13 record, the phone number 917 -- I think it's (917)  
14 416-4600?

15 A I don't see that anywhere.

16 Q I'm sorry. (917) 346-4600.

17 A Again, it's not here.

18 Q If you'll hand me the document, I'll show  
19 you.

20 A Thank you. I'll make that correction.

21 Q And you would agree that this form is a  
22 matter of public record, is -- it was filed with the  
23 FEC?

24 A Again, it was not filed by me.

25 MR. SMITH: I'd like to tender this as

1 Respondent's Exhibit, I think --

2 JUDGE KLUKAS: You're at C? B, D.

3 MR. SMITH: D. Is Defendant's or  
4 Respondent's Exhibit D.

5 (EXHIBIT D WAS ADMITTED INTO EVIDENCE.)

6 BY MR. SMITH:

7 Q Isn't it true that you formed that political  
8 action --

9 JUDGE KLUKAS: Ms. Wong, you're on the stand  
10 right now.

11 THE WITNESS: Okay.

12 JUDGE KLUKAS: So in fact, why don't you  
13 come take a seat over here.

14 THE WITNESS: Okay. I can't talk to my  
15 attorney?

16 JUDGE KLUKAS: Not while you're on the  
17 stand.

18 THE WITNESS: I'm sorry. Can I bring my  
19 tea?

20 JUDGE KLUKAS: You can bring your tea.  
21 Leave the other things. Thank you.

22 MR. SMITH: And may I approach, Your Honor?

23 JUDGE KLUKAS: Yeah, give it to the bailiff.

24 MR. SMITH: Show you another --

25 MR. DEFILIPPO: Same thing? Can I say first

1 --

2 MR. SMITH: Yeah.

3 MR. DEFILIPPO: Okay. Another going to be  
4 this one?

5 MR. SMITH: Yep.

6 BY MR. SMITH:

7 Q And before we get to that one, Ms. Wong, the  
8 Restore Integrity PAC, you formed in 2024; correct?

9 A Again, it was someone else who formed it for  
10 me. I believe it was 2024.

11 Q Okay. And that's a political action  
12 committee?

13 A Yes.

14 Q Okay. What does that political action  
15 committee do?

16 MR. DEFILIPPO: Object to relevance, Your  
17 Honor.

18 JUDGE KLUKAS: Overruled right now. Let's  
19 see where he is going with this.

20 MR. DEFILIPPO: Counsel, excuse me.

21 JUDGE KLUKAS: You --

22 UNIDENTIFIED SPEAKER: I was giving him  
23 notes -- piece of paper (crosstalk) --

24 MR. SMITH: This -- that hasn't been  
25 tendered yet. I was going to show it to the witness

1 in a moment.

2 JUDGE KLUKAS: Before you move on,  
3 Respondent's D, this is a document that was created  
4 when?

5 MR. SMITH: The Respondent's D, can I see  
6 that?

7 JUDGE KLUKAS: Sure. There's a letter dated  
8 February 14 of '25, and then an attachment to it that  
9 --

10 MR. SMITH: Yes, yes.

11 JUDGE KLUKAS: -- has a different date.

12 MR. SMITH: That is -- the letter I think  
13 may have been just stapled to the back of it, but the  
14 --

15 JUDGE KLUKAS: Which is not supposed to be  
16 there?

17 MR. SMITH: Which is not supposed to be  
18 there.

19 JUDGE KLUKAS: Okay. So let's get that  
20 back. That one goes up. Okay.

21 BY MR. SMITH:

22 Q So can you tell us what the Restore  
23 Integrity PAC does?

24 A It does nothing. I'm going to close it.

25 Q Okay.

1 JUDGE KLUKAS: What was it supposed to do?

2 THE WITNESS: It was supposed to help one  
3 candidate in New Jersey do fundraising, and he had  
4 asked me to help him on his campaign to be the  
5 treasurer and to start this PAC, but it went nowhere.  
6 So I'll close it.

7 JUDGE KLUKAS: Okay.

8 BY MR. SMITH:

9 Q And I'd like to show you another document.  
10 It's the one I just showed you. Ms. Wong, can you  
11 tell me what that document is?

12 A It's an FEC form for Capitol Hill Fight  
13 Club.

14 Q And is that also a political action  
15 committee that you formed in 2024?

16 A Again, this was formed by  
17 juliecho0217@gmail.com.

18 Q Okay. Are you completely unfamiliar with  
19 Capitol Fight Club?

20 A No. I know it, I asked her to form it for  
21 me and -- but I haven't done anything with it.

22 Q Okay. And isn't it true that the phone  
23 number listed for that one is (917) 346-4600?

24 A The phone number listed on that is (312)  
25 296-0627.

1 MR. SMITH: May I approach, Judge?

2 JUDGE KLUKAS: Yeah.

3 BY MR. SMITH:

4 Q Look at -- looking at the -- it is right  
5 here, Ms. Wong.

6 A Again, the person who filed it is -- had an  
7 old business card of mine. We'll have that corrected.

8 Q Okay. So if we were to call (917) 346-4600  
9 right now, would it ring through?

10 A I don't know. Try.

11 MR. DEFILIPPO: Calls -- objection. Calls  
12 for speculation.

13 JUDGE KLUKAS: Overruled. Ms. Wong, is that  
14 your current phone number?

15 THE WITNESS: No. It's not my current phone  
16 number.

17 BY MR. SMITH:

18 Q Have -- you had testified earlier that you  
19 tried to do away with that -- what -- you've had to do  
20 away with your phone numbers many times. Do you have  
21 a phone number?

22 A It's my son's.

23 Q That's your son's?

24 A Yes.

25 Q So you still have it?

1           A     Yes.

2           Q     Okay.  But you testified earlier that you  
3 got rid of it?

4           A     I got rid of it personally and have my own  
5 phone number.

6           Q     So you were receiving harassing phone calls  
7 on the 4600 number, and you gave that phone to your  
8 son?

9           A     It's disabled.  It's just for playing games  
10 and YouTube videos.

11           MR. SMITH:  Okay.  I'm going to show you  
12 another document.  Yes.

13           JUDGE KLUKAS:  Okay.  Did counsel see this?

14           MR. DEFILIPPO:  Yes.

15           JUDGE KLUKAS:  Okay.  Show it to Ms. Wong.

16           BY MR. SMITH:

17           Q     Ms. Wong, that is -- can you tell me what  
18 that document is?

19           A     It's an FEC Statement of Organization.

20           Q     Okay.  And is that a political action  
21 committee that you formed in 2024?

22           A     No.  Juliecho4nth@gmail.com formed it.

23           Q     Okay.  Did she form it with your  
24 authorization?

25           A     Yes.

1 Q And what is the name of that political  
2 action committee?

3 A Operation Bullyproof.

4 Q And is that a play on names regarding Mr.  
5 Fitzgerald or related to Mr. Fitzgerald?

6 A Well, Mr. Fitzgerald was convicted and  
7 incarcerated over Operation Bullypen -- Bullpen.

8 Q Okay.

9 A Operation Bullpen. So yeah, I could say  
10 that's -- it's a play on names for the harassment that  
11 I had faced for two years.

12 Q And you formed that political action  
13 committee in July of 2024?

14 A I don't remember.

15 Q Can you look at the document and see if you  
16 can recall?

17 A It says -- no. It says October 29, 2024.

18 Q Okay. If you look at the organization at  
19 the date on the first page, you'll see there's a date  
20 here.

21 A Yeah. It says July 02, 2024.

22 Q So that was formed in July of 2024?

23 A I guess so.

24 Q And that is a political action committee  
25 that is meant to combat Mr. Fitzgerald?

1           A       I believe it was supposed to be a 501(c)(4)  
2 and not a PAC, but I think this is a PAC, but I have  
3 to just double-check with who formed it. It should be  
4 a 501(c)(4), which is a different filing.

5           JUDGE KLUKAS: Was this used for anything?

6           THE WITNESS: I'm sorry?

7           JUDGE KLUKAS: Was this used for anything?

8           THE WITNESS: It was supposed to be used as  
9 a non-profit to combat online bullying. It was formed  
10 by me and the then -- what's her name? Melinda  
11 Ciattarelli, whose husband is running for governor of  
12 New Jersey. We had formed this to be an anti-bully  
13 nonprofit.

14          JUDGE KLUKAS: And since you formed it, has  
15 it been used for anything?

16          THE WITNESS: Well, it's not very well  
17 organized because she's on the campaign trail for her  
18 husband, so we haven't really had time to do anything  
19 with it.

20          BY MR. SMITH:

21          Q       Okay. But it stood -- would you say that  
22 Operation Bullypen is still in existence?

23          A       We haven't done anything with it since we  
24 formed it.

25          Q       Okay. But it's still in existence?

1           A     I mean, it's on paper.

2           Q     Okay.  And -- let's see.  I don't think we  
3     tendered that.  I think we're at Defendant's Exhibit  
4     D, which was the Capitol Fight Club organizational  
5     statement.

6           JUDGE KLUKAS:  This is E.

7           MR. SMITH:  E.

8           JUDGE KLUKAS:  I don't know if that one was  
9     tendered.  Let me know that one.

10          MR. SMITH:  Not yet.

11          JUDGE KLUKAS:  Okay.  So then this is going  
12     to --

13          MR. SMITH:  So I'd to tender that as  
14     Defendant's Exhibit --

15          MR. DEFILIPPO:  Your Honor, if I just -- if  
16     I may, for the record, we have an objection to the  
17     admission of all of these in light of the fact that  
18     they were not presented to me in any exhibit list,  
19     which we did file with our -- all of our exhibits  
20     months prior.  It's the first time we're seeing all  
21     this, Judge.  So procedurally, we'd like to object for  
22     lack of notice of these exhibits.

23          JUDGE KLUKAS:  Okay.

24          MR. SMITH:  Judge, we would say that they  
25     are rebuttal exhibits, and there were several exhibits

1 that we were not served with prior to that were  
2 tendered last time.

3 JUDGE KLUKAS: This is -- okay. And they'll  
4 be admitted over objection. I understand your  
5 objection, Counsel. This is D, this is E, and this is  
6 F. Okay. Keep going.

7 (EXHIBITS E AND F WERE ADMITTED INTO  
8 EVIDENCE.)

9 MR. DEFILIPPO: Just reading, Your Honor,  
10 since I haven't had an opportunity to before --

11 JUDGE KLUKAS: Take all the time you need.

12 BY MR. SMITH:

13 Q Can you tell me what that is, Ms. Wong?

14 A This is a rebuttal to all the harassment  
15 that I have faced, and repeat traumatization from Mr.  
16 Fitzgerald. Both Melinda Ciattarelli and I have been  
17 abused online repeatedly by our predators as long --  
18 as well as other women. And we formed a group called  
19 Operation Bullyproof for victims of online abuse.

20 Q And so that's a website that you created in  
21 July of 2024?

22 A I did not create this website.

23 Q Okay. Is -- was it created with your  
24 authority?

25 A I gave my bio.

1 Q Can you please tell us what you put in your  
2 bio?

3 A Angie Wong is a graduate of Columbia  
4 University's graduate school of journalism. She's had  
5 a successful 20-year career as a news editor and  
6 columnist in the US and Asia. Angie is now a  
7 political commentary on a number of news programs on  
8 BBC, Fox News, OANN, and other networks. She is also  
9 a columnist for the New York Post.

10 Q So you've been involved in political  
11 journalism for the past 20 years?

12 A Incorrect.

13 Q Okay. Have you been involved in political  
14 journalism in the last three years?

15 A I would say two and a half.

16 Q And would you --

17 JUDGE KLUKAS: I would say what? What was  
18 the answer?

19 THE WITNESS: Two and a half.

20 JUDGE KLUKAS: Two and a half. Okay.

21 BY MR. SMITH:

22 Q And when -- I guess when you started working  
23 for L-Strategies, would you say that you were  
24 politically active at that time? Let me rephrase the  
25 question.

1           Were you taking photographs with multiple  
2 candidates in 2022, 2023?

3           A     Me personally. Not for L-Strategies.

4           Q     Okay. And so you personally were taking  
5 photographs with a lot of political candidates in 2022  
6 and 2023?

7           A     What do you mean by a lot?

8           Q     Well, would you say more than 20?

9           A     I would say about 20.

10          Q     Okay. And isn't it true that in 2022 and  
11 2023, you were frequenting political campaigns and  
12 campaign rallies?

13          A     I attended Trump rallies, if that's what you  
14 mean.

15          Q     Okay. And isn't it true that you actually  
16 worked on campaigns or assisted people with their  
17 campaigns during this period of time?

18          A     I don't remember any of them.

19          Q     Well, you don't remember whether or not you  
20 assisted people with campaigns in 2022?

21          A     What do you mean by assist?

22          Q     Well, I mean, you just mentioned that you  
23 and the wife of the person that's running for governor  
24 of the state of New Jersey formed a political action  
25 committee. You testified earlier that you were a

1 political consultant. You --

2 A You're asking me about 2022?

3 Q Yes.

4 A Those things are not happening in 2022.

5 Q What were you doing in 2022?

6 A In 2022, I was a fan girl of Donald Trump,  
7 and I was going to his rallies.

8 Q Okay. And in 2023 when you met Mr.  
9 Fitzgerald, isn't it true that you met him at a  
10 campaign rally?

11 A No.

12 Q Where'd you meet him?

13 A He contacted me on Facebook. He was a  
14 complete stranger.

15 Q Did you visit the US-Mexican border in 2022?

16 A I was invited by the Washington Examiner to  
17 go to the Southern border to report.

18 Q Okay. So I asked if you were in political  
19 journalism in 2022, and you said no. Now you're  
20 saying that you were invited by a political  
21 publication to go cover a story?

22 A No, to witness. I can hear everything the  
23 way.

24 Q Had you -- say again.

25 A I mean, I can hear the conversations, just

1 so you know.

2 Q Well, isn't it true that you were involved  
3 with BlackPAC prior to 2022?

4 A Not before 2022.

5 Q In 2022, were you involved in BlackPAC?

6 A Yes, I was volunteering at first.

7 Q Okay.

8 A But just as a volunteer.

9 Q Okay. Were you ever in the leadership of  
10 that organization?

11 A I was in leadership for about two or three  
12 months.

13 Q Okay. And that was in 2022?

14 A I have to go back and check. It was '22 or  
15 '23.

16 Q So you were in leadership of a political  
17 action committee in 2022 or 2023; is that right?

18 A Yeah. What does this have to do with my  
19 stalking case?

20 JUDGE KLUKAS: What is BlackPAC?

21 THE WITNESS: It's a political action  
22 committee that was formed by George Farrell and his  
23 wife a long time ago, and I was volunteering for them.

24 JUDGE KLUKAS: And what is the objective of  
25 BlackPAC?

1 THE WITNESS: What is the objection to  
2 BlackPAC?

3 JUDGE KLUKAS: Objective of.

4 THE WITNESS: They helped get out the vote  
5 for Black, Latino, and Asian candidates and the voters  
6 -- Black, Latino, and Asian voters. That's what it  
7 said anyway. That's not exactly what they did.

8 BY MR. SMITH:

9 Q Isn't it true that you were asked to step  
10 down from leadership of BlackPAC?

11 A No.

12 Q Okay. You voluntarily resigned from  
13 leadership of BlackPAC?

14 A When I found out that they were fraudulent  
15 and laundering money, I removed myself within 24 hours  
16 of finding that out.

17 Q Okay.

18 A Again, this has nothing to do with my  
19 stalking case.

20 Q Are you familiar with RocketReach, Ms. Wong?

21 A No.

22 Q You don't know if you have a RocketReach  
23 profile?

24 A I definitely do not have a RocketReach. I  
25 don't even know what RocketReach is.

1 MR. SMITH: Like to show the witness the  
2 document to reflect -- refresh her recollection.

3 JUDGE KLUKAS: Go ahead.

4 MR. DEFILIPPO: So she didn't say she didn't  
5 remember. She outright denied having one. I'm going  
6 to object.

7 THE WITNESS: I've never seen this before in  
8 my life.

9 MR. SMITH: Okay.

10 THE WITNESS: This is probably produced by  
11 Stan Fitzgerald, the master forger.

12 MR. SMITH: Okay. I have --

13 THE WITNESS: I don't even know what  
14 RocketReach is.

15 JUDGE KLUKAS: Okay. And go back to --

16 BY MR. SMITH:

17 Q Now, you had testified in the previous  
18 hearing that you'd been unable to work due to the  
19 things that Mr. Fitzgerald has done to you; is that  
20 correct?

21 A I'd like to see my testimony. I don't  
22 believe that's what I said.

23 Q Well, what is it you think you said?

24 A I think that he was calling up every single  
25 news network that I was working for and harassing them

1 to get me off air.

2 Q Okay. And you don't recall testifying that  
3 it was very difficult for you to work now?

4 MR. DEFILIPPO: Objection.  
5 Mischaracterizing the witness's testimony. Before it  
6 was unable; now difficult. Which one is being  
7 asserted to the witness?

8 JUDGE KLUKAS: All right. That'll be  
9 sustained.

10 BY MR. SMITH:

11 Q So do you recall saying that it was  
12 difficult?

13 A Every time I went on air, Mr. Fitzgerald and  
14 his associates would contact the producers and tell  
15 them that I'm CCP, that I embezzled money, and send  
16 them all these links to websites owned by them, and  
17 also to fake news publications pushed out by them to  
18 get me off air.

19 Q Isn't it true that shortly after the hearing  
20 on February 14th, you appeared on Newsmax?

21 A Why are you stalking me? Why would you  
22 (crosstalk) --

23 JUDGE KLUKAS: Ms. Wong, I need you to  
24 answer the question --

25 THE WITNESS: Yes, I was on Newsmax.

1           JUDGE KLUKAS:  -- unless I instruct you  
2 otherwise.

3           BY MR. SMITH:

4           Q     So you appeared on Newsmax?

5           A     Yes.

6           Q     And that's a television broadcast?

7           A     Yes.  I spoke with the owner who told me  
8 that Mr. Fitzgerald had contacted --

9           MR. SMITH:  Objection, Your Honor.

10          THE WITNESS:  I'm answering your question.

11          MR. SMITH:  That's not the question that I  
12 asked.  I just asked if she was -- appeared on the  
13 television show.

14          MR. DEFILIPPO:  Respondent -- door has been  
15 open.  She may give a full answer to the question.

16          JUDGE KLUKAS:  Correct.  Answer the question  
17 and then you can expand if necessary.

18          THE WITNESS:  Yes.  I was invited on Newsmax  
19 given this hearing because Mr. Fitzgerald had  
20 contacted Newsmax to try to get me off air.  The owner  
21 of Newsmax is a friend of mine who heard about it, and  
22 invited me on to the studio in New York because he did  
23 not believe Mr. Fitzgerald's lies.

24          BY MR. SMITH:

25          Q     And isn't it true that you also appeared on

1 OAN after the February 14th period?

2 A No. That's false.

3 Q Okay. Did you appear on Sky News?

4 A I did appear on Sky News.

5 Q Okay. And did you appear on Real America's  
6 Voice?

7 A No.

8 Q Have you -- let's say from 2023 to the  
9 present, have you appeared on OAN?

10 A I don't believe I have, but I have to go  
11 back and check.

12 Q Would you have appeared on Sky News?

13 A Sky News was after all the harassments.  
14 This is a new relationship I have. Stan Fitzgerald  
15 does not know who to contact at Sky News to harass.

16 Q Would you have appeared on Real America's  
17 Voice?

18 A I don't believe I have.

19 Q And when you do appear on these programs,  
20 are you paying to appear on them?

21 A No.

22 Q So you've never paid at all to appear on --

23 A I did not say that.

24 Q Okay. Well, that's what I'm asking you  
25 then, have you ever paid to appear on a news

1 broadcast?

2 MR. DEFILIPPO: Object. Relevance, Judge.

3 JUDGE KLUKAS: Sustained. Move on.

4 MR. SMITH: You're --

5 THE WITNESS: Can I state, Counsel?

6 JUDGE KLUKAS: No question. No question.

7 MR. DEFILIPPO: In the middle of --

8 THE WITNESS: I'm sorry.

9 MR. SMITH: All right. That's all that I  
10 have for now, Judge. I reserve the right to recall  
11 for rebuttal.

12 MR. DEFILIPPO: Brief redirect, Your Honor?

13 JUDGE KLUKAS: Yes, except --

14 MR. DEFILIPPO: Just on what was --

15 JUDGE KLUKAS: We only have miss -- do you -  
16 - how many witnesses does the respondent have?

17 MR. SMITH: Just Mr. Fitzgerald and Mr.  
18 Craig.

19 JUDGE KLUKAS: Mr. Craig. Okay. So I do  
20 anticipate we can wrap this up today.

21 MR. SMITH: Yes, Judge.

22 JUDGE KLUKAS: Which means that any  
23 questions you have for Ms. Wong --

24 MR. SMITH: Yes.

25 JUDGE KLUKAS: -- need to be asked.

1 MR. SMITH: Yes, Judge.

2 JUDGE KLUKAS: Go ahead with any redirect.

3 MR. DEFILIPPO: Thank you, Your Honor.

4 REDIRECT EXAMINATION

5 BY MR. DEFILIPPO:

6 Q Ms. Wong, why would Mr. Fitzgerald state  
7 that you were a part of Veterans for America First, if  
8 you were not in fact a part of that group?

9 A Because he needs legitimacy for a fake  
10 organization so he puts --

11 MR. SMITH: Objection.

12 THE WITNESS: -- real people.

13 JUDGE KLUKAS: Hold on.

14 THE WITNESS: So he puts --

15 JUDGE KLUKAS: Hold on, ma'am. Ms. Wong,  
16 please wait.

17 MR. SMITH: Relevance.

18 JUDGE KLUKAS: Okay. Overruled.

19 BY MR. DEFILIPPO:

20 Q You may answer the question.

21 A He puts real with the fake. So he will put  
22 real politicians, real newscasters, real people with a  
23 fake organization to make it appear as if it were real  
24 so that he could produce and collect donations, and  
25 look like he is a big player in the political world.

1           Q     Has anyone other than Mr. Fitzgerald made  
2 these types of allegations about you that you were a  
3 CCP spy, conducting criminal activity, engaged in  
4 prostitution? To your knowledge, has anyone else from  
5 any of these interactions in political -- in your  
6 political world made these allegations about you  
7 before?

8           A     Once Mr. Fitzgerald put it out there in the  
9 public realm, people have asked me about it. Most  
10 people don't believe him because of the aggressive  
11 attacks on me. They know that this is a political  
12 attack, but they have asked me about it, to explained  
13 myself because it's all over the internet.

14          Q     Okay. So the content of, for example,  
15 Exhibit 1 and Exhibit 2, the docking screenshots, does  
16 the content of those screenshot, those emails give you  
17 reason to believe that the creator of that  
18 angiewongccp --

19               MR. SMITH: Objection. Leading.

20               JUDGE KLUKAS: Overruled.

21               BY MR. DEFILIPPO:

22          Q     -- does the content of those emails give you  
23 reason to believe that angiewongccp, that email  
24 address, must only be Mr. Fitzgerald?

25          A     Yes, because behavior is the same, whether

1 it's that email or other emails he has produced in the  
2 last two years that I've been following his behavior.  
3 He also lists my driver's license as part of the  
4 doxing program that he's put me on. All this  
5 information only Mr. Fitzgerald had. It's not in the  
6 public domain like his opposing counsel is trying to  
7 put out there. These are my private information that  
8 Mr. Fitzgerald over text messages and emails have  
9 asked me directly for.

10 Q So as a political consultant, were you in  
11 the business of starting PACs or being part of the  
12 process for PACs to be initiated?

13 A Yes. I've started PACs in 2024, and I was  
14 part of the PAC in 20 -- whenever BlackPAC was  
15 started, '23, '22. Whenever -- I don't remember the  
16 exact dates.

17 Q And as part of starting a PAC, do you have  
18 to disclose your phone number?

19 A Again, I've never filed it myself. I hire  
20 people to do it, so I don't know.

21 Q Assuming your phone number had to be  
22 disclosed in the formation documents for these PACs --

23 A Yeah.

24 Q -- does -- and you would have done -- you  
25 would have approved that; right? You would have said

1 okay to that if your phone number had to be part of  
2 it?

3 A Sure. Yes.

4 Q By you approving that, does that also mean  
5 that you approved your number being included in these  
6 doxing emails that were sent to numerous individuals  
7 attached to allegations of criminal activities,  
8 spying, and prostitution?

9 But what I'm getting at, by putting it in  
10 the PAC formation documents, were you also approving  
11 it to be spread in these doxing emails?

12 A Absolutely not. I mean, they're putting it  
13 completely out of context that my phone number was in  
14 the public domain, so therefore he's allowed to use it  
15 in his harassing emails sent out to thousands of  
16 people. That's incorrect. He's not allowed to dox me  
17 and my children.

18 Q Now, Mr. Baker -- there was some testimony  
19 regarding Mr. Baker; was that your ex-boyfriend?

20 A He was my college boyfriend.

21 Q College boyfriend. And was the injunction  
22 that you sought against Mr. Baker, did it have  
23 anything to do with these allegations today that we  
24 were bringing against Mr. Fitzgerald?

25 A Yes.

1 Q What are -- what is the relationship?

2 A The relationship was Mr. Fitzgerald had  
3 contacted Peter Baker online when he was searching all  
4 of my contacts, looking through my Facebook pages,  
5 looking at everyone I followed, and he contacted my  
6 ex-boyfriend for explicit images.

7 Q And the injunction against Mr. Baker, you  
8 were successful in that injunction?

9 A Correct.

10 Q What was the reason why they couldn't enter  
11 it -- the Court couldn't enter it against Mr.  
12 Fitzgerald at that time?

13 A Because Mr. Fitzgerald was never my domestic  
14 partner. They only entertained defendants that were  
15 domestic partners.

16 Q Your suit that you testified to previously  
17 involving your mom, and your sister, and your brother,  
18 does it have anything to do with the allegations that  
19 we're here for today?

20 A Zero.

21 Q The suit for the malpractice against an  
22 attorney in New York, does it have anything to do with  
23 the cyber harassment allegations that we're here for  
24 today?

25 A Absolutely nothing.

1           Q     Now, you mentioned that -- you named Mr.  
2 Collis -- Patrick Collis in a defamation lawsuit.  
3 That was -- was that prior to knowing what you know  
4 now about how Mr. Conz was influenced or manipulated  
5 by Mr. Fitzgerald?

6           A     Mr. Fitzgerald uses -- steals identities,  
7 including my own, angiewongccp, for example, and he  
8 prints it as his. He puts out emails, text messages.  
9 He spoofs my phone number into the public domain as if  
10 a congressman is receiving a text message from me  
11 asking to have sex with him.

12                   I never put out such a text message, but he  
13 does by spoofing me. So he did the same thing with  
14 Patrick Collis. He signed a falsified FBI  
15 investigation saying Patrick Collis was the one who  
16 signed it when Patrick here in this Court testified  
17 that he had nothing to do with it.

18           MR. SMITH: Objection. That misstates Mr.  
19 Collis's testimony. He said he could neither confirm  
20 nor deny.

21           JUDGE KLUKAS: Sustained.

22           BY MR. DEFILIPPO:

23           Q     And this Operation Bullyproof -- through  
24 your efforts with Operation Bullyproof, did you ever  
25 directly correspond with Mr. Fitzgerald during

1 Bullyproof -- Operation Bullyproof, which I believe  
2 was an effort to combat online harassment? Did you  
3 interact with him directly for -- with that?

4 A I never interacted him directly. Again,  
5 this is a group of at least maybe 20 women who have  
6 been harassed by Mr. Fitzgerald. We formed this group  
7 together because we found so many victims online from  
8 Mr. Fitzgerald over the years.

9 MR. DEFILIPPO: Okay. I have no further  
10 questions.

11 JUDGE KLUKAS: Okay. All right. Ms. Wong,  
12 you can step down. You're excused.

13 THE WITNESS: Do you want this?

14 JUDGE KLUKAS: I'll take all the exhibits or  
15 pass them to the bailiff. Okay. All right. Counsel,  
16 call your next witness.

17 MR. DEFILIPPO: Your Honor, at this time we  
18 call Mr. Butch Conz.

19 JUDGE KLUKAS: Okay. Actually, it's 2:42.  
20 Why don't we take a five-minute recess and we'll start  
21 with Mr. Conz?

22 MR. DEFILIPPO: Yes, Your Honor.

23 (A RECESS WAS TAKEN.)

24 JUDGE KLUKAS: You guys are fine. You can  
25 have a seat. Okay. Just up. Yes.

1 MR. DEFILIPPO: I just -- you said these was  
2 ours?

3 (BACKGROUND CONVERSATION.)

4 JUDGE KLUKAS: Yeah, I think he's off now.  
5 Where was that? I don't believe this was tendered.  
6 This Bullyproof was not tendered; correct?

7 MR. SMITH: I believe she did testify to it  
8 so I would like to tender it.

9 JUDGE KLUKAS: Over objection?

10 MR. DEFILIPPO: Not quite other than the  
11 notice objection, Judge, that I had that before.

12 JUDGE KLUKAS: Okay. So it'll be admitted  
13 over objection.

14 MR. SMITH: (Inaudible).

15 JUDGE KLUKAS: Okay. So just add the --

16 MR. DEFILIPPO: Okay. And he says computers  
17 (inaudible) when I try to (inaudible).

18 JUDGE KLUKAS: Okay.

19 MR. DEFILIPPO: Your Honor, Mr. Collis might  
20 not be on right now because he's saying he was -- he's  
21 having computer problems, but he's trying to log back  
22 on right now.

23 JUDGE KLUKAS: Okay. Now would be a good  
24 time for him to log back on.

25 MR. DEFILIPPO: Yeah.

1 JUDGE KLUKAS: Let me --

2 MR. DEFILIPPO: The three things that -- my  
3 computer --

4 JUDGE KLUKAS: If he is not on -- Mr. Conz,  
5 can you turn on your camera, sir?

6 MR. DEFILIPPO: And tell me where it was  
7 that you sent it.

8 UNIDENTIFIED SPEAKER: I'll -- can you give  
9 me the three items?

10 MR. DEFILIPPO: Yes. The retweet.

11 JUDGE KLUKAS: Mr. Conz is -- is he just not  
12 there? Did he step out?

13 MR. DEFILIPPO: I think whoever was  
14 connecting me logged him off. Give me a minute.

15 JUDGE KLUKAS: No. He's logged on.

16 MR. DEFILIPPO: He's logged on?

17 JUDGE KLUKAS: He's logged on.

18 MR. DEFILIPPO: Oh.

19 JUDGE KLUKAS: I see Butch Conz.

20 MR. DEFILIPPO: Okay.

21 JUDGE KLUKAS: Yeah, but he's not -- I'm  
22 asking him to --

23 MR. DEFILIPPO: Okay.

24 JUDGE KLUKAS: -- turn on his camera.

25 MR. DEFILIPPO: He's not responding to you,

1 okay. Please respond.

2 JUDGE KLUKAS: Okay. Why don't we turn to  
3 the respondent's case. Aside from him -- reserving  
4 the right to call him --

5 MR. DEFILIPPO: Yes.

6 JUDGE KLUKAS: -- the petitioner rests?

7 MR. DEFILIPPO: Yes, Your Honor.

8 JUDGE KLUKAS: Okay. So we'll turn to --

9 MR. DEFILIPPO: Well, Your Honor, we do want  
10 to call Mr. Fitzgerald. I apologize.

11 JUDGE KLUKAS: Well, correct. So I -- do  
12 you want to direct your client?

13 MR. SMITH: Actually, Judge, no. We were  
14 going to move for dismissal, and we believe that Ms.  
15 Wong has not carried her burden of proof. And so  
16 before having Mr. Fitzgerald testify, we were going to  
17 move for dismissal.

18 JUDGE KLUKAS: Okay. Do you want to add  
19 anything else additional by way of argument?

20 MR. SMITH: Yes. Yes, Your Honor. If the  
21 Court -- if it pleases the Court, Ms. Wong is not fail  
22 -- has failed to show by clear and convincing evidence  
23 that Mr. Fitzgerald has engaged in any of the --

24 JUDGE KLUKAS: May I have the stack of  
25 exhibits?

1 MR. SMITH: Sorry. They're here.

2 JUDGE KLUKAS: Okay. This is Petitioner.  
3 Thank you. And Respondent -- and this is Respondent.  
4 Okay. I'm with you.

5 MR. SMITH: Yes, ma'am. The case law is  
6 replete that -- and the evidence has been clear that  
7 this -- all of this arose out of political activities.  
8 Ms. Wong is -- has been at all times material hereto  
9 actively involved in politics. And she even stated a  
10 few moments ago on the stand that that these were  
11 "political attacks." And case law has been very clear  
12 in both Florida and the United States Supreme Court  
13 that in these situations, the injunction statute in  
14 cyber stalking is not applicable.

15 That specifically the case of David versus  
16 Textor, which is the District Court of Appeals for the  
17 Fourth District made very clear in 2016. That's 1809  
18 So. 3d 871, that when you're dealing with  
19 sophisticated business people -- and obviously Ms.  
20 Wong testified that she graduated from Columbia, that  
21 she's been involved in journalism for a long time,  
22 that she's been involved in politics for a long -- for  
23 a while at all times material hereto, that when you're  
24 dealing with sophisticated business people, that they  
25 have to develop a thick skin.

1           And certainly, there is a legitimate purpose  
2 when you're talking about the allegations of  
3 embezzlement, allegations quite frankly going both  
4 ways of fiscal impropriety. And so that's exactly  
5 what this was. The other case where the Supreme Court  
6 made very clear -- sorry. This case of Raulerson V.  
7 Font, that was here in this judicial circuit, an  
8 attorney was kind of going overboard and was sending  
9 harassing emails, text messages, contacting another  
10 attorney's employer and things of that nature.

11           This attorney even said that he used a drone  
12 to surveil this young associate. And the Court said  
13 that's not enough for an injunction. That basically  
14 in a case like this, again, there has to -- when  
15 you're dealing with sophisticated business people,  
16 there has to be a thick skin.

17           The -- and the Court said, "Look, the bar  
18 may be an appropriate remedy, but certainly injunctive  
19 relief is not appropriate in this situation." And  
20 that's at 277 So. 3d at 1057. The Court has even gone  
21 so far to say that when you're dealing in a political  
22 context, even false statements are protected by the  
23 First Amendment. And --

24           JUDGE KLUKAS: What statements?

25           MR. SMITH: False statements are protected

1 by the First Amendment.

2 JUDGE KLUKAS: That last one, 277 So. 3d  
3 1057?

4 MR. SMITH: 277 So. 3d 1057.

5 JUDGE KLUKAS: And that's Raulerson?

6 MR. SMITH: That's Raulerson versus Font.

7 JUDGE KLUKAS: That's in a homeowner's  
8 insurance context.

9 MR. SMITH: The one -- I've got a copy of it  
10 for everyone here, Judge.

11 JUDGE KLUKAS: I see. No. He -- you're --  
12 he's -- I'll take a copy if you have copies of the  
13 case law.

14 MR. SMITH: Yes, Judge. I do.

15 JUDGE KLUKAS: Pass it up.

16 JUDGE KLUKAS: Mr. Conz, are you there?  
17 Okay. Stay with me. I'll be right with you.

18 MR. SMITH: And this is the Textor case.

19 JUDGE KLUKAS: Okay. All right.

20 MR. SMITH: So basically also, Judge, the  
21 case of Budlove versus Johnson, which is 377 So. 3d at  
22 206 says that the speech does not lose its protected  
23 character even when the speech involved publicly  
24 listing the names of individuals who did not  
25 participate in a boycott went on to say that the First

1 Amendment protection applied to the distribution of  
2 leaflets when those leaflets accused an individual of  
3 racism and provided personal information about the  
4 person, including his telephone number.

5 And that was the United States Supreme Court  
6 Case, Organization for a Better Austin versus Keefe.  
7 And that is cited by the Florida District Court of  
8 Appeals for the Second District. Budlove. Budlove.  
9 The case of Scott V. Blum, which is 191 So. 3d at 502.  
10 Again, even false statements made are protected by the  
11 First Amendment when made in the context of political  
12 speech. I'm sorry, hang on this. Wrong one.

13 I did receive one case from opposing  
14 counsel, and this is the case of Thoma versus O'Neal  
15 180 So. 3d 1157. And apprising in a Court of all  
16 cases that could be applicable in this situation as a  
17 matter of candor.

18 JUDGE KLUKAS: Which one?

19 MR. SMITH: That is the case of Thoma versus  
20 O'Neal, and that is the Fourth District Court of  
21 Appeals, 180 So. 3d 1157. In that case there was a  
22 pamphlet that was produced, and that pamphlet was  
23 produced by an anti-abortion activist that listed the  
24 name of a nurse that was assisting with individuals  
25 offering alternatives to abortion. And that leaflet

1 was produced, it contained the name and address of the  
2 individual, and it actually was sent directly to that  
3 individual's home address.

4 And it also included a call to action  
5 saying, "Reach out, touch this person. Tell this  
6 person to stop what they're doing." And the Court  
7 found that, you know, the fact that it did reach out  
8 directly to the person's address was in fact, I guess,  
9 a violation of some sort. But it went on to say that  
10 the pamphlet itself, the leaflets itself, that  
11 contained the identifying information and the address  
12 and the -- and things of that nature was protected by  
13 First Amendment protections.

14 MR. DEFILIPPO: It's my case.

15 MR. SMITH: And so, Judge, we would argue  
16 that Ms. Wong's testimony has been that she's been  
17 involved in politics, that these are -- as she stated  
18 in the very, very end of her testimony, these are  
19 political attacks. She's actively involved in  
20 politics. And this is politics, and I don't like it.  
21 I wish that it wasn't the case, but it is. And Ms.  
22 Wong is actually forming a political action committee  
23 months prior to filing for this injunction, which  
24 politicized the very thing that she's claiming here  
25 today, only months before filing this injunction.

1           And so we believe that the evidence would  
2 show that she would benefit -- her political action  
3 committee would benefit from the issuance of an  
4 injunction. And we believe that this is political  
5 speech that is protected by the First Amendment.  
6 There's also insufficient evidence to show that Mr.  
7 Fitzgerald --

8           JUDGE KLUKAS: What specifically do you  
9 think is political speech? Which of the allegations  
10 are -- go to political speech?

11          MR. SMITH: Well, all of the Collis report,  
12 everything that was listed in the CCP Wong email was  
13 about her embezzling from a political action  
14 committee. Now, Mr. Fitzgerald didn't author that  
15 email, but that report --

16          JUDGE KLUKAS: So then it's -- you don't  
17 know if it's political speech or not?

18          MR. SMITH: Well, I mean, he didn't author  
19 it, but the contents of it demonstrate that it's  
20 political, such as embezzlement from a political  
21 action committee, such as if Ms. Wong were a CCP spy,  
22 certainly that would be political in nature. Our  
23 current Department of Intelligence secretary has been  
24 accused of being a Russian spy, and that was very,  
25 very public. And so --

1 JUDGE KLUKAS: So just bringing you back to  
2 the amended petition, the first incident where it's  
3 alleged that Mr. Fitzgerald showed up to her husband's  
4 place of work, is that political speech?

5 MR. SMITH: That is not political speech,  
6 Judge, but we would contend that there's insufficient  
7 evidence to show that he did.

8 JUDGE KLUKAS: Okay, I understand that.  
9 That's of course your argument. These -- tire  
10 sabotage incident where it's alleged that -- right?

11 MR. SMITH: No, Judge, that's not political  
12 speech, however. That's --

13 JUDGE KLUKAS: Okay. Going to the third  
14 item in the petition where it stated that on or about  
15 February of 2024, Respondent's business partner under  
16 his direction posted a direct Facebook and other  
17 social media platforms with the acronym of FAFO.  
18 There's only testimony of that. I have not seen the  
19 actual posting. But do you contend that that would be  
20 political speech?

21 MR. SMITH: That particular -- I haven't  
22 seen the posting, but I believe that it probably is --

23 JUDGE KLUKAS: Okay.

24 MR. SMITH: -- political speech.

25 JUDGE KLUKAS: The FBI investigation claims,

1 so a lot of that falls into Petitioner's 2, 3, and 4,  
2 and the emails sent by angiewongccp.

3 MR. SMITH: Yes.

4 JUDGE KLUKAS: There's a lot of discussion  
5 about an FBI investigation. Would you contend that's  
6 political speech?

7 MR. SMITH: Yes, Judge.

8 JUDGE KLUKAS: Even if there's never  
9 actually been an FBI investigation?

10 MR. SMITH: That would -- I believe that  
11 that would fall under -- first, we believe that there  
12 has, but I believe that that would also fall under the  
13 -- assuming that there wasn't, it would fall under  
14 what the Supreme Court has said. Even false  
15 allegations in a political context are protected by  
16 the First Amendment.

17 JUDGE KLUKAS: In which case was that?

18 MR. SMITH: That was -- this is -- I believe  
19 that it was in the Bud versus -- it was cited as a US  
20 Supreme Court case.

21 JUDGE KLUKAS: Or rather which -- this is  
22 the Fourth. It's not a Florida Supreme Court case.  
23 You're saying they cited two.

24 MR. SMITH: They -- the Florida District  
25 Court of Appeals, that is in the Budlove versus

1 Johnson, Second DCA cited the United States Supreme  
2 Court Opinion Organization for a Better Austin versus  
3 Keefe at 402 US 415 1971. And they -- the Second DCA  
4 said holding that First Amendment protection applied  
5 to the distribution of leaflets when those leaflets  
6 accused the individual of racism and provided personal  
7 information, including telephone number.

8 And I believe it's on further down that it  
9 discusses -- and in those cases that I provided, it  
10 does discuss that even false statements made in a  
11 political context are protected by the First  
12 Amendment.

13 JUDGE KLUKAS: Okay.

14 MR. SMITH: And of course, Judge, we're not  
15 saying -- you know, certainly, we're not saying that  
16 these allegations -- number one, most of what Ms. Wong  
17 has shown didn't come from Mr. Fitzgerald, and he  
18 denies it, and there's really not anything directly  
19 linking him to it. But then number two, even assuming  
20 for a moment, except for the tire-slashing, which is  
21 very, very thin in terms of actual evidence and things  
22 of that nature, it is political in nature.

23 And so we would say that Ms. Wong has failed  
24 to carry her burden, and we would ask that the  
25 petition for injunction be dismissed. There is a

1     defamation action.  And Ms. Wong has availed herself  
2     of that.  That's an avenue why by which she could get  
3     a remedy, but she's now asking for an injunction,  
4     which -- for statements made that would be protected  
5     by the First Amendment.

6             JUDGE KLUKAS:  Okay.  All right.  Thank you,  
7     Mr. Smith.  Counsel, response?

8             MR. DEFILIPPO:  You want to do another  
9     response now, or should I go forward with testimony  
10    from Mr. Conz who's ready?

11            JUDGE KLUKAS:  I don't want to keep  
12    splitting it up.  Let me get a response.  We'll go to  
13    Mr. Conz.

14            MR. DEFILIPPO:  Just -- we believe that Ms.  
15    Wong was the target of a systemic campaign of cyber  
16    harassment, much of which would not be protected under  
17    the First Amendment, Your Honor, because it was  
18    specifically designed to cause substantial harm in Ms.  
19    Wong.  When you look at the doxing and the false  
20    claims, the spreading of her information, her phone  
21    number, her address, that right there goes beyond any  
22    type of political.

23            It's protected First Amendment speech when  
24    you're trying to simulate a response to Ms. Wong,  
25    whether it be physically or in person at her home or

1 to her phone. It goes beyond when you add up the mass  
2 levels and amounts that we've -- that we've seen today  
3 that we've tried to introduce. Just a taste, Your  
4 Honor, you know, since 2023, she would be doxed.

5 Ms. Wong would be the recipient of -- or at  
6 least the subject of numerous press releases and  
7 articles. These articles accuse her of being a spy.  
8 They accuse her of being a prostitute. They accuse  
9 her of committing crimes which are unfounded  
10 completely. They accuse her of being the subject of  
11 an FBI investigation, which is completely unfounded.

12 Mr. Conz himself, whose name was used to  
13 support that FBI allegation, refuted it all in his  
14 testimony. We have testimony that even images were  
15 altered to create the appearance as though she was a  
16 spy to support these false claims. There was contact  
17 not only to Ms. Wong's ex-boyfriend who Mr. Fitzgerald  
18 found an ally in, but we have also contacts to her  
19 husband, physical in nature, coming to his house or to  
20 his place of work, rather.

21 And also, you know, digitally through an  
22 email to Swire -- everyone at Swire repeating these  
23 false claims that go beyond political; right? Spy for  
24 the Chinese Communist government, prostitute,  
25 criminal; right? Beyond political speech. And when

1 you view them in a totality, Your Honor, the conduct  
2 meets the criteria for cyberstalking under 784.048 by  
3 preponderance of the evidence, which I believe is the  
4 standard by which we were held today, not clear and  
5 convincing, which counsel stated earlier.

6 And that statute states that, you know, to  
7 engage -- cyberstalking occurs when the person engages  
8 in a course of conduct to communicate or to cause to  
9 be communicated directly or indirectly, words, images,  
10 or language, by through the use of electronic mail or  
11 electronic communication directed at or pertaining to  
12 a specific person, and to access or attempt to access  
13 the online accounts or internet -- connected home  
14 electronic systems of another person.

15 Judge, I submit to you, we have shown  
16 evidence of both. There's been attempts to hack at  
17 least on one occasion, Facebook and perhaps another  
18 occasion on Google. We know that Mr. Fitzgerald lives  
19 in Acworth, Georgia, and we know the person who  
20 attempted to hack Ms. Wong's Facebook account was from  
21 Acworth, Georgia. We also have potential hacking of  
22 the Google account from his home or from his office  
23 address in Paulding, Georgia.

24 Not to mention element one, which is the  
25 course of conduct to communicate or to cause to be

1 communicated, images, words, or language, which we  
2 have nearly, you know, 16 exhibits to that effect,  
3 Judge. When you also add the fact that Ms. Wong's  
4 race has been implicated.

5 I think that may implicate another statute  
6 that I would love for Your Honor to at least review in  
7 your deliberation, 784.04938, harassment or  
8 intimidation based on religious or ethnic heritage,  
9 which states that a person may not willfully or  
10 maliciously harass or intimidate another person based  
11 on the person's wearing or displaying of any indicia  
12 relating to any religious or ethnic heritage.

13 I submit to Your -- the Court that every  
14 single allegation that Ms. Wong is a Chinese spy could  
15 potentially run afoul with this statute. Not to  
16 mention the distress that it causes Ms. Wong to know  
17 that there could be someone that takes that seriously,  
18 that threat, and when coupling it with her address,  
19 could act upon that and do who knows what to her or  
20 her family.

21 So, Your Honor, when you look at the  
22 totality of all of it, yes, one of these taken out of  
23 context might very well be protected by the First  
24 Amendment. But when you look at it all, I think we've  
25 overcome those protections. And Thoma verse O'Neal is

1 similar in that this was a flyer, essentially, a flyer  
2 that doxed the person and that had a call to action.

3 Now, I believe we could read in a call to  
4 action in many of these exhibits, but if there wasn't  
5 specifically a call to action, per se, like we had in  
6 Thoma, by saying she's a spy, by putting her address  
7 out there, by putting a picture of her with Mao, you  
8 are essentially creating a call to action.

9 You're asking for someone to respond to  
10 that. And when you give them the home address, the  
11 response could be very serious, could be very  
12 concerning. So for those reasons, Your Honor, we ask  
13 that Your Honor issue a permanent injunction to  
14 protect Ms. Wong from any future harassment or  
15 cyberstalking.

16 JUDGE KLUKAS: Okay. At this time, I'm  
17 going to deny a motion to dismiss. I want to hear  
18 from Mr. Fitzgerald. Certainly as the petitioner has  
19 said, maybe one or two of these in isolation could be  
20 viewed as political speech, but taking in the totality  
21 of all the communications here and the incidents that  
22 go beyond political speech, I want to hear from Mr.  
23 Fitzgerald and any other case that you want to put on,  
24 Mr. Smith.

25 We're going to turn to the last witness for

1 the petitioner, and then we'll turn over the  
2 respondent's case.

3 MR. SMITH: And, Judge, I believe that I'm  
4 waiting in the waiting room for --

5 JUDGE KLUKAS: Okay. You're in.

6 MR. SMITH: Thank you.

7 JUDGE KLUKAS: All right, Mr. Conz, can you  
8 hear me, sir? But I can't hear you. All right.  
9 Let's figure out the audio. Can you figure -- you  
10 make sure it's not on your end. My speaker's turned  
11 all the way up. Can you hear me? Can you give me a  
12 thumbs up?

13 MR. CONZ: Can you hear me now?

14 JUDGE KLUKAS: Perfect. Okay.

15 MR. CONZ: Okay. So sorry about that.

16 JUDGE KLUKAS: Okay. No problem. Can you  
17 raise your right hand for me? Do you swear to tell  
18 the truth, the whole truth, and nothing but the truth?

19 MR. CONZ: Yes.

20 JUDGE KLUKAS: Okay. And your name for the  
21 record?

22 THE WITNESS: My name is Edward Mr. Conz,  
23 Jr., and my nickname is Butch.

24 JUDGE KLUKAS: Okay. Mr. Conz, I'm going to  
25 allow you to direct him. I'm going to mute my audio

1 and allow you to unmute yours so that there's no  
2 feedback issues. Try now.

3 THE WITNESS: Thank you. Pardon.

4 JUDGE KLUKAS: Still? No, there's a bad --

5 THE WITNESS: Still something --

6 JUDGE KLUKAS: Do you have yours muted, Mr.  
7 Smith?

8 MR. SMITH: Yes, Judge. Mine is muted.

9 JUDGE KLUKAS: Try now.

10 MR. DEFILIPPO: Testing, testing. Mr. Conz,  
11 can you hear me?

12 JUDGE KLUKAS: Except I silenced him.

13 MR. DEFILIPPO: Now I can't hear Mr. --

14 JUDGE KLUKAS: Okay. This is a little bit  
15 of -- this room is not set up.

16 THE WITNESS: Now --

17 JUDGE KLUKAS: I think what we did last  
18 time. Mute yours.

19 MR. DEFILIPPO: Muting mine.

20 JUDGE KLUKAS: Okay. Try now.

21 MR. DEFILIPPO: Mr. Conz, can you hear me?

22 THE WITNESS: Yes, I can hear you. Can you  
23 hear me?

24 MR. DEFILIPPO: Yes, I can.

25 JUDGE KLUKAS: You're going to have to speak

1 up.

2 MR. DEFILIPPO: Speak up for that. Got it.  
3 Yes, Judge.

4 DIRECT EXAMINATION

5 BY MR. DEFILIPPO:

6 Q Mr. Conz, can you just spell your name for  
7 the record please?

8 A I'm sorry?

9 Q Can you spell your name for the record,  
10 please?

11 A E-D-W-A-R-D, C-O-N-Z.

12 Q Where do you live, Mr. Conz?

13 A I live in the Blue Ridge Mountains in North  
14 Carolina.

15 Q And what do you do for a living?

16 A Well, I own a lubrication company, meaning  
17 to say we specialize in main -- industrial and  
18 automotive stuff -- additives. I own a construction  
19 company. I also own a NASCAR race team.

20 Q Do you have knowledge of the respondent in  
21 this case, Mr. Stan Fitzgerald? Do you know this  
22 person?

23 A I've never met -- personally met him.

24 Q How do you know Mr. Stan Fitzgerald, the  
25 respondent?

1           A     He sold me a chapter for Veterans for  
2 America First and Veterans for Trump. And it turned  
3 out to be false. He didn't own it. He didn't -- he  
4 claims in the contract that they own the trademarks.  
5 They don't; they were denied. That's how I met him.

6           Q     That -- the falsity of that, Mr. Conz, is  
7 that the subject of any lawsuits that you have between  
8 yourself and Mr. Fitzgerald?

9           A     It is. They actually tried to -- they're  
10 trying to sue me in Georgia in their backyard for  
11 breach of contract. And I guess my biggest question  
12 is, how can you have a breach of contract if the  
13 contract was breached before it was ever signed?

14          Q     So tell me briefly about Veterans for  
15 America First. Do you know who the true owner of  
16 Veterans for America first is, Mr. Conz?

17          A     Yes, I do.

18          Q     Who would that be?

19               MR. SMITH: Objection.

20               JUDGE KLUKAS: Hold on.

21               MR. SMITH: I would have object on  
22 relevance.

23               JUDGE KLUKAS: Overruled.

24               BY MR. DEFILIPPO:

25          Q     Do you know if Mr. Fitzgerald, the

1 respondent, was ever the president -- national  
2 president for Veterans for America First?

3 A He claimed to be, but they've never been  
4 incorporated. They've never been registered in any  
5 state at any time, including Georgia where he's from.

6 Q Okay. Is it your belief that he claimed to  
7 do -- to be the president in order to gain any  
8 political influence or secure any donations?

9 A Absolutely.

10 Q Okay.

11 JUDGE KLUKAS: Mr. Conz, how are you the  
12 owner if it doesn't exist?

13 THE WITNESS: Well, ma'am, Your Honor, when  
14 I started not trusting this guy, I started doing an  
15 investigation. And investigating him, I found out  
16 that he was involved in the largest forgery fraud  
17 crime in US history named Operation Bullpen. And I  
18 started digging, then I started looking for  
19 corporation and so forth, and found out that they  
20 weren't incorporated anywhere, so I had already paid  
21 him money.

22 So I incorporated here in North Carolina  
23 start and I have since incorporated -- have  
24 incorporated everywhere else, including Georgia and  
25 including Florida, which if you go to your Secretary

1 of State, you can find that.

2 JUDGE KLUKAS: Okay.

3 BY MR. DEFILIPPO:

4 Q And, Mr. Conz, how do you know the  
5 petitioner, Ms. Angie Wong?

6 A Well, I had heard of Angie when I first got  
7 involved with this group before, you know, everything  
8 broke apart. And what I had heard -- hold on, guys.  
9 Something just came across my screen. Can you hear  
10 me?

11 Q Yes, we can.

12 A Okay. I'm going to keep going, but if  
13 there's something in front of my screen, I'm going to  
14 try to get right up here. Okay. Got it.

15 And Stan was -- Stan had made a lot of  
16 comments on the phone and stuff regarding Angie, and I  
17 just -- I ignored him because I really didn't care.  
18 And then when him and I had a blowout, he started  
19 attacking me. Well, I had watched all along him  
20 attacking, and I heard him attack Angie Wong.

21 So obviously, when I found out he was a  
22 federal felon, him and his wife and his mother were  
23 all federal felons, I tracked Angie down and I  
24 introduced myself and we had some conversations. And  
25 at one point we met -- excuse me, we met her in Miami

1 in April of 2024, and we've since become friends.

2 She's a good lady.

3 Q Okay. Mr. --

4 A She's involved with our Veterans for America  
5 First.

6 Q Okay. Mr. Conz, I'm looking at a document  
7 entitled Sworn Affidavit. It's signed by you and  
8 notarized. In this document, you state that in  
9 January 2024, you had a phone conversation with Stan  
10 Fitzgerald of Acworth, Georgia, in which you were told  
11 how Mr. Fitzgerald -- how much Mr. Fitzgerald hated  
12 Angie Wong of Miami, Florida. Do you recall the phone  
13 conversation in January 2024?

14 A I do.

15 Q And in this affidavit here, you talk about  
16 Mr. Fitzgerald terrorizing Ms. Wong; can you elaborate  
17 as far as what you learned and how he would do that?

18 A Well, that's what I just said. He kept  
19 putting stuff on social media. Any place and every  
20 place he could put on social media, he took out his  
21 own press releases, paid for his own press releases to  
22 trash her. He put it on X. He put it on Facebook.  
23 He put it on their website. It was everywhere.

24 Q How long was that? How long were you aware  
25 that that was ongoing?

1           A     Probably from January on.

2           Q     Of what year?

3           A     2024.

4           Q     Did Mr. Fitzgerald ever talk with you  
5 directly about his plans to give these statements  
6 about Ms. Wong?

7           A     Sorry?

8           Q     Did Mr. Fitzgerald ever talk with you  
9 directly regarding his plans to disseminate this  
10 information about Ms. Wong?

11          A     Do you mean on -- you mean on social media?

12          Q     Yeah. Or through his other methods that you  
13 brought up, press releases or articles or such. Did  
14 you ever have a --

15          A     He never talked to me about them, but he  
16 would have no reason to.

17          Q     Okay. How did you know that these things  
18 were coming from Stan, these press releases and these  
19 certain communications?

20          A     Some of them had his name on it, and they  
21 were put on L-Strategies website, which at the time he  
22 was the president of. They were put on his version of  
23 Veterans for America First website. That's how we  
24 know that where they came from.

25          Q     Are you aware that Mr. Fitzgerald created an

1 email username called angiewongccp?

2 A Yes, I am aware of that.

3 Q How are you aware that he created that email  
4 username?

5 A Well, again, he put things on social media  
6 and angiewongccp, that supposed email, he had sent  
7 some stuff out to -- I don't know, hundreds of people  
8 that were on -- CC-ed on it. And it would be a little  
9 strange. It would be like me putting out something on  
10 Butch Conz and then trashing myself. Nobody in their  
11 right mind is going to have an email and trash  
12 themselves, so it didn't take a genius to figure out,  
13 well, sure it wasn't Angie. And the only one who had  
14 been trashing Angie was Stan Fitzgerald.

15 Q Are you aware of anyone else that was making  
16 the allegation that Ms. Wong was this Chinese spy for  
17 the CCP other than Mr. Fitzgerald?

18 A I do not.

19 Q Has Stan -- has Mr. Fitzgerald ever  
20 expressed violent intentions or made any comments  
21 about harming Angie?

22 A Well, like I put in my affidavit. Okay.  
23 And basically, I have it here. I'll quote it, is that  
24 he'd do whatever he had to do to take her out. Now,  
25 I'll be honest with you, at the time, I didn't think

1 much of it. I just figured he was pissed off and  
2 running his mouth because people do that.

3 But as I see more and more in social media  
4 then -- and then when I found out more about him, you  
5 know, being a federal felon, seeing his personal  
6 release conditions, then it kind of came together and  
7 it dawned on me that this guy wasn't kidding and he  
8 was actually serious. And he's -- in my opinion and  
9 according to his prison release records, he's nuts.

10 MR. DEFILIPPO: I have no further questions  
11 for Mr. Conz. I'll pass the witness.

12 CROSS-EXAMINATION

13 BY MR. SMITH:

14 Q But just briefly. Mr. Conz, can you hear  
15 me?

16 A Yep.

17 Q Ms. Wong testified earlier that you had done  
18 an investigation on Mr. --

19 THE WITNESS: Hold on one second. Can you  
20 turn that up just a little bit? Okay.

21 MR. SMITH: If you --

22 JUDGE KLUKAS: I don't mind.

23 THE WITNESS: Sorry.

24 BY MR. SMITH:

25 Q Mr. -- Ms. Wong testified earlier that you

1 had hired a private investigator to investigate Mr.  
2 Fitzgerald; is that correct?

3 A I had a hired somebody to do a background  
4 check on him, yes.

5 Q Okay. And was that individual that you  
6 hired Mr. Patrick Collis?

7 A It was.

8 Q Okay. And so you and Mr. Collis are in  
9 business together now; is that right?

10 A I'm sorry?

11 Q Are you and Mr. Collis in business together?

12 A No.

13 Q Have you ever been in business together?

14 A No.

15 Q Okay. Have you ever hired him to do any  
16 other investigations?

17 A Yes.

18 Q Okay. How many more would you say?

19 A Numerous. He does background investigations  
20 when I hire people for any one of my three companies.

21 Q Okay. And isn't it true that you have no  
22 direct knowledge that Mr. Fitzgerald created the  
23 angiewongccp web -- email address?

24 A That is true. I understand (inaudible).

25 MR. SMITH: Okay. No further questions.

1 MR. DEFILIPPO: I have no redirect, Judge.  
2 Thank you. Mr. Conz, thank you for your time.

3 THE WITNESS: Well --

4 MR. DEFILIPPO: The Court may have questions  
5 for you. The Court may have questions.

6 JUDGE KLUKAS: Let me just quickly go over.

7 THE WITNESS: May I speak to the Court, one  
8 thing?

9 JUDGE KLUKAS: Just give me a second. Don't  
10 lose your thought.

11 THE WITNESS: Okay.

12 JUDGE KLUKAS: Earlier, you testified that  
13 Mr. Fitzgerald took out press releases, that it was on  
14 X, that there -- it was on websites, that it was  
15 everywhere. What were you referring to?

16 THE WITNESS: Attacks on Angie Wong.

17 JUDGE KLUKAS: Nothing -- no one attack in  
18 particular? Just general statements against her?

19 THE WITNESS: Just -- yeah, just numerous  
20 attacks on Angie Wong.

21 JUDGE KLUKAS: Did you ever receive any of  
22 the emails from him?

23 THE WITNESS: I believe I received one way  
24 back, maybe two.

25 JUDGE KLUKAS: Was that from the

1 angiewongccp email or directly from Mr. Fitzgerald?

2 THE WITNESS: One of them was, yes. One of  
3 them was, yes.

4 JUDGE KLUKAS: Okay. Did you communicate  
5 via email with Mr. Fitzgerald?

6 THE WITNESS: I'm sorry?

7 JUDGE KLUKAS: Did you ever communicate via  
8 email with Mr. Fitzgerald?

9 THE WITNESS: No. By the time we had our  
10 blowout, I just -- at that point, I wanted nothing to  
11 do with him and I've had nothing to do with him since.  
12 And, Your Honor, if I may, one of the things that  
13 really hit me was when he started calling her. They  
14 put out social media calling her CCP before CCP email.  
15 Okay. In --

16 JUDGE KLUKAS: His personal (crosstalk) --

17 THE WITNESS: -- the article that came out  
18 on August 12, 2024, by -- what's it called? Bear with  
19 Me. Mother Jones. I don't know if you've heard of  
20 that news group. It talks about Stan Fitzgerald and  
21 Jared Craig, who are partners in L-Strategies, in L-  
22 Strategies about taking money from a company stationed  
23 out of Canada called New Noah (ph), which is owned by  
24 Miles Gal (ph), a Miles Gal is CCP and he is sitting  
25 in jail awaiting in sentencing right now in Manhattan.

1 And that article talks about that.

2 JUDGE KLUKAS: When you say that there was  
3 social media calling her CCP before the CCP email was  
4 even created, do you recall that on Mr. Fitzgerald's  
5 personal social media or companies or entities that he  
6 controlled?

7 THE WITNESS: Both. Stuff on X, stuff on  
8 Facebook, and then he has some, like you said,  
9 entities that he controls that he puts all kinds of  
10 stuff up. And he attacked me just over the weekend,  
11 my wife and I. I mean, that's the other thing. You  
12 know, Angie's not in it alone. He attacks anybody who  
13 doesn't bow to his wishes.

14 JUDGE KLUKAS: Tell me how you were  
15 attacked.

16 THE WITNESS: And I'm sorry, I'm not bowing  
17 to a criminal's wishes.

18 JUDGE KLUKAS: What posts were made about  
19 you and your wife?

20 THE WITNESS: Well, there was just one made  
21 recently about us. I don't what was the exact --

22 UNIDENTIFIED SPEAKER: He's got something --

23 MR. SMITH: Judge, hold on a second. Your  
24 Honor, I would object. They're communicating with one  
25 another on the stand.

1 MS. CONZ: VFAF News.

2 MR. DEFILIPPO: I believe it's his wife,  
3 Your Honor.

4 MS. CONZ: In --

5 JUDGE KLUKAS: Mr. --

6 MS. CONZ: Says that it's a parody and it's  
7 all -- whatever.

8 THE WITNESS: Here has an X account that  
9 says VFAF News.

10 JUDGE KLUKAS: What is it called?

11 THE WITNESS: He talks about being a parody.

12 JUDGE KLUKAS: Hold on. What is it called?  
13 V?

14 THE WITNESS: VFAF News. (Crosstalk) --

15 JUDGE KLUKAS: Okay. How do you know that  
16 belongs to Mr. Fitzgerald?

17 THE WITNESS: Because he -- if you dig back  
18 far enough on his stuff, which he doesn't realize that  
19 I've had access to, the ones that he controls under  
20 (inaudible) US, he's actually put it up on their  
21 websites and so forth. Now, I'm sure as soon as this  
22 Court hearing is over, he'll immediately take it down  
23 but that's where -- how I know.

24 JUDGE KLUKAS: Okay.

25 THE WITNESS: Because he's actually -- he

1 directs it to those places.

2 JUDGE KLUKAS: So VFAF News is an account on  
3 X that over the weekend posted something disparaging  
4 about you and your wife?

5 THE WITNESS: Correct.

6 JUDGE KLUKAS: And what was the post? What  
7 did the post say?

8 THE WITNESS: I did not --

9 JUDGE KLUKAS: See it -- it was your wife?

10 THE WITNESS: It said, "Take a good look at  
11 this racist Butch guy." Called me a racist of North  
12 Carolina, racist and impersonating veterans. My  
13 wife's reading it to me, behind me.

14 JUDGE KLUKAS: Okay.

15 MR. SMITH: Judge --

16 JUDGE KLUKAS: Okay. I'll sustain the  
17 objection. If you don't have the knowledge of it, I -  
18 - but just in general.

19 THE WITNESS: Well, I do. That's why I was  
20 just reading it to you.

21 JUDGE KLUKAS: Okay. Understood. So you  
22 were called a racist and you were called something  
23 else on a post just this weekend?

24 THE WITNESS: Just -- and for more  
25 information, Butch (inaudible) Conz, it says go to

1 lstrategies.org/articles.

2 JUDGE KLUKAS: Okay. Directing you to the  
3 L-Strategies website. Is that currently a business he  
4 owns as far as you know?

5 THE WITNESS: Yes. Now, he's going to claim  
6 he doesn't, but he's went on and off of it several  
7 times to try to hide from stuff, and yes, he's  
8 definitely one of only two owners, actually.

9 JUDGE KLUKAS: Okay. Okay. Any redirect?  
10 Any other questioning for this witness based on what -  
11 - the information he just provided? Mr. Smith?

12 MR. SMITH: Yes, Judge, if I may. There is  
13 a document I would like to --

14 BY MR. SMITH:

15 Q Mr. Conz, can you see this?

16 A Can I -- I can't really see it now and I  
17 can't hear you.

18 Q Can you see this document?

19 A Yeah.

20 Q And is that a post that you made on your  
21 account?

22 A Actually, I can't see the whole thing, but  
23 that is my account. I don't know if it is or not, to  
24 be honest with you. I can't tell my -- what you're  
25 going on.

1 Q So do you --

2 A He has a tendency to cut and paste a lot of  
3 things and put them on social media so --

4 Q So you've never -- have you ever posted on  
5 your account the N-word, calling someone an N-word?

6 A That's cut and paste, but no, I haven't.

7 Q So you've never called someone an N-word on  
8 one of your accounts?

9 MR. DEFILIPPO: Object to relevance, Judge.

10 JUDGE KLUKAS: That's sustained.

11 THE WITNESS: I didn't say that.

12 JUDGE KLUKAS: That's sustained. That's  
13 fine, Mr. --

14 THE WITNESS: I'm an Italian boy from  
15 Detroit that coached an all-Black high school football  
16 team. So to say I've never used that word (crosstalk)  
17 --

18 MR. DEFILIPPO: Tell him it's been  
19 sustained. He does not have to explain himself.

20 JUDGE KLUKAS: Mr. Conz, it's been  
21 sustained. You don't need to respond. Any other  
22 questions? All right. Thank you, Mr. Conz, for your  
23 testimony, and for your time, and your patience this  
24 afternoon. You're all set. You can disconnect.

25 THE WITNESS: Thank you, Your Honor.

1 JUDGE KLUKAS: Okay.

2 THE WITNESS: How do I disconnect?

3 JUDGE KLUKAS: Okay. So that concludes the  
4 petitioner's case in chief. Let's turn to the  
5 respondent. It's 3:30 p.m. So we're doing good on  
6 time. Do you want to direct your client, Mr.  
7 Fitzgerald? Mr. -- wait, let me remove him. Mr.  
8 Smith? He's fine.

9 MR. SMITH: Yes, Judge. I can -- can we go  
10 ahead first and see if Mr. Craig is online while we  
11 have the Zoom pulled up?

12 JUDGE KLUKAS: Yeah, just let him in. Mr.  
13 Craig, good afternoon, sir. Are you there? Can you  
14 turn on your camera?

15 MR. CRAIG: Yes, Your Honor. Thank you.  
16 Sorry about that.

17 JUDGE KLUKAS: No problem. All right. Good  
18 afternoon, sir. Can you raise your right hand? Do  
19 you swear to tell the truth, the whole truth, and  
20 nothing but the truth?

21 MR. CRAIG: Yes, I do.

22 JUDGE KLUKAS: And your name for the record?

23 THE WITNESS: My name is Jared Craig.

24 JUDGE KLUKAS: Okay. You can lower your  
25 hand. Okay. Do you want to direct your witness?

1 MR. SMITH: Yes.

2 JUDGE KLUKAS: We're going to have the same  
3 issues. I'm going to move my mic, and do you want to  
4 sit in the chair so you're not hovering?

5 MR. SMITH: Thank you.

6 JUDGE KLUKAS: That's totally fine.

7 DIRECT EXAMINATION

8 BY MR. SMITH:

9 Q Mr. Craig, can you tell us what you do for a  
10 living? Can you hear, Mr. Craig? Hello? Can you  
11 hear us?

12 JUDGE KLUKAS: Mr. Craig, I apologize. Can  
13 you hear us?

14 THE WITNESS: Yes, I can now.

15 BY MR. SMITH:

16 Q Okay. Mr. Craig, can you tell us what you  
17 do for a living?

18 A Yes. I'm an attorney in the state of  
19 Georgia, and I handle wide variety of civil actions,  
20 primarily family law, criminal defense, and a few  
21 other things that -- related to estate planning.

22 Q Do you know Ms. Angie Wong?

23 A I do, or I did.

24 Q How do you know her?

25 A When I was affiliated -- well, first off,

1 when I was a candidate to US Congress in 2022, I was  
2 running in some political circles and I was in West  
3 Palm Beach and I met her at an event for BlackPAC. It  
4 was a changing of the presidency of BlackPAC where I  
5 was introduced to her as a fundraiser. I had seen her  
6 on social media and I met her as a fundraiser  
7 associated with BlackPAC.

8 Q When you met her at -- did she give you her  
9 telephone numbers?

10 A Not the first time. Just to jump ahead,  
11 when I had more interactions with her was when I had  
12 lost my election in May of 2022, and I was joining  
13 forces with the Veterans for America First for  
14 Veterans for Trump organization. And at that time, I  
15 was just about to start funding the Trump bus tour  
16 with John Fredericks, and she was involved with that.  
17 And at that time, I was actually on the road with the  
18 bus tour for a period of over three weeks, and she was  
19 in and out of the tour.

20 I was static with the bus tour traveling  
21 every day. And I ended up getting contact information  
22 from Angie at that time. If I had the phone number  
23 beforehand, that's -- I really never communicated with  
24 her before that bus tour. But at that time, we  
25 communicated so we could coordinate where we were

1 going to be on certain dates.

2 Q Do you recall her giving you a phone number,  
3 the last four digits of which were 4600?

4 A I would have to look at my phone to look to  
5 see which number I have in that phone, but I had  
6 several phone numbers for Angie. As we are in modern  
7 day, you know, we look at the names of the number.  
8 But if you wouldn't mind, I can look in my phone now  
9 to see where Angie Wong -- the last four digits to  
10 confirm. Let's see.

11 THE WITNESS: Sorry for the delay, Judge.  
12 Okay. What was the last four digits you're asking  
13 for?

14 BY MR. SMITH:

15 Q 4600.

16 A Yes, I do.

17 Q And did you receive another number from her,  
18 the area code being 305?

19 A Yes.

20 Q And what number was that?

21 A Although I never really used that number,  
22 the 4600 number was primarily the number that I  
23 communicated with her through by phone and text.

24 Q Okay. And what was the other number that  
25 had the 305 area code?

1           A     Let me look in here one moment. I  
2 apologize. I had five-something just a moment ago.  
3 Actually, sorry. (Inaudible). I have taken that  
4 number out of my phone. I can only confirm that I had  
5 received three different phone numbers in the past  
6 that I had from her. So I only communicated with her  
7 at the 4600 number, but I know that I was given the  
8 other two numbers additionally.

9           Q     And was you -- did you at one point work  
10 with Ms. Wong?

11          A     Sort of, yes. We were working with the  
12 America First Legacy PAC, and she was the previous  
13 president, and we were trying to get that up and  
14 running and trying to figure out the proper formation,  
15 were we going to be a simple leadership PAC. We were  
16 going to be a hiring PAC or Super PAC. And in trying  
17 to establish how we're going to move forward, we  
18 worked together to, you know, figure out the pros and  
19 cons of each one of those versions of a PAC --  
20 political action committee.

21                 And in doing so, we learned that she was not  
22 capable of doing any fundraising, although that was  
23 part of the reason why she was in charge. And she was  
24 really put in charge of scheduling our kickoff party,  
25 which was in March of 2023. And when we had that

1 kickoff party at the University club in Washington,  
2 D.C., leading up to that, we determined that she was  
3 not capable of organizing a kid's birthday party, much  
4 less a political action committee and, you know,  
5 kickoff party.

6 And we had to hire outside services for  
7 that. We learned over a short period of time that she  
8 couldn't deliver on the promises that she was making  
9 in fundraising or in organizing an event because it  
10 just seemed to be less than organized. Let me just  
11 put it (inaudible).

12 Q What, if any, fiscal impropriety did you  
13 find in that organization?

14 A Fiscal impropriety --

15 MR. DEFILIPPO: Object to relevance.

16 JUDGE KLUKAS: Overruled.

17 THE WITNESS: Well, concerning Legacy PAC,  
18 we had a bank account that was maintained out of a  
19 bank out of Tennessee. And I had joined Legacy PAC  
20 and was trying to get oversight to see what's going  
21 on. And, you know, as the attorney in the room, I  
22 wanted to see what had been going on before I got  
23 involved.

24 And from November of 2022 or October until  
25 May, I was promised access to these accounts, and I

1 believe it was mid to late April of 2023 I saw that --  
2 or I finally had access to those accounts. And I saw  
3 that the account had been overdrawn, which was a big  
4 red flag because it was the red numbers on the bank  
5 statement, and it was related to the pickup party at  
6 the University club I just referenced that almost fell  
7 apart if we didn't have outside management and  
8 organizing.

9 But specifically on the impropriety was that  
10 the payment was made to the university club, and then  
11 there were two different refunds and the payment  
12 caused the account to bounce when it should not have  
13 bounced whatsoever. So that maybe raised some red  
14 flags in that account.

15 BY MR. SMITH:

16 Q And who was overseeing the Legacy account at  
17 that time?

18 A The only person who had any access to the  
19 Legacy PAC account was Angie Wong until mid to late  
20 April of 2023. When I discovered that the account had  
21 been overdrawn by -- I think it was 6 or \$8,000 which  
22 made, you know, me cringe because we're just starting  
23 off. And it made no sense to me. How could we go in  
24 the red? And then I saw two refunds from the  
25 University Club for the same amount, which seemed very

1 fishy because I knew that Stan Fitzgerald was also hit  
2 up for the cost of that event on his American Express  
3 card.

4 Q And --

5 A So it was -- it's a lot of paying the same  
6 thing.

7 Q And what were you able to find -- what was  
8 your conclusion regarding how the finances were  
9 handled by Ms. Wong?

10 A Well, the beautiful thing of this is it was  
11 so simple. It was only one page of transactions. And  
12 my conclusion is that it was mishandled (inaudible),  
13 and the money that was spent more than what was in the  
14 balance. So just simply stating, she mishandled the  
15 entire account either by not knowing what the account  
16 was, or I'm not sure exactly what her thoughts were.  
17 I don't want to speculate.

18 Q Do you know where those refunds went to?

19 A The refunds that we saw in the statement  
20 were refunded back to the Legacy PAC account, but I  
21 don't know where the second refund went because when  
22 the first refund cured the overage -- or sorry, the  
23 overdraw, I'm not sure exactly where any of the money  
24 went because it didn't end up in America First Legacy  
25 account.

1           MR. DEFILIPPO: Your Honor, I'm going to  
2 object to relevance of this entire line of questioning  
3 regarding the bank account.

4           JUDGE KLUKAS: At this point, I'm going to  
5 sustain that. I think this is too far afoot. So move  
6 on, Counsel.

7           BY MR. SMITH:

8           Q     Okay. So just -- when did Angie Wong cease  
9 being affiliated with Legacy, and why is she no longer  
10 affiliated?

11          A     Sure. Shortly after finding that she had,  
12 I'll just say, mishandled the account and incapable of  
13 managing and organizing the kickoff party, in May of  
14 2023, we had a board meeting for the remaining  
15 members, and we voted her off. I believe it was May  
16 30th. I -- actually, I'm not completely sure exactly  
17 the date of the board meeting, but we voted her out of  
18 both organizations. That one was the American First  
19 Legacy PAC, and the other was the L-Strategies, which  
20 was the corporate firm holding the licenses in which  
21 we operated the name of American -- sorry, Veterans  
22 for Trump and Veterans for American First.

23          Q     And last question, did Mr. Fitzgerald have  
24 any access to these bank accounts?

25          A     No. In fact, I was asked to step in and

1 review those accounts so he would not have any direct  
2 access and connection for that. He didn't have any  
3 interest in managing those things. And because of my  
4 career and doing what I do with family law and seeing  
5 bank statements all the time, it was within my field  
6 of operation. So was basically, Angie had access to  
7 everything related to Legacy PAC until I got a second  
8 eye, and then only I have had access since then.

9 MR. SMITH: Nothing further.

10 JUDGE KLUKAS: Okay. Mr. Craig, who owns L-  
11 Strategies?

12 THE WITNESS: I do.

13 JUDGE KLUKAS: You're the sole owner?

14 THE WITNESS: That's correct.

15 JUDGE KLUKAS: Has Mr. Fitzgerald ever been  
16 a co-owner?

17 THE WITNESS: He has in the past, but when  
18 the -- I'll say we got into the idea of doing  
19 different business ventures, some of which revolve  
20 around consulting and different things that really  
21 never really panned out. We had a few clients, so it  
22 became, I'll say, a little bit of a burden for Stan  
23 Fitzgerald. So I've taken it on and maintained the  
24 operations. The purpose of it right now is really to  
25 maintain the licensure for the Veterans for America

1 First grassroots outreach. It is not really a  
2 business that's functioning to profit, but I'm the  
3 sole owner and of that corporation, and it is an LLC.

4 JUDGE KLUKAS: And when was the last time  
5 Mr. Fitzgerald was an owner of L-Strategies?

6 THE WITNESS: It has been this -- at least  
7 by August of 2023, I believe that is when I took over  
8 complete ownership of L-Strategies.

9 JUDGE KLUKAS: And what does L-Strategies  
10 do?

11 THE WITNESS: L-Strategies is a -- virtually  
12 the holding company that owns the licensing rights for  
13 Veterans for America First and Veterans for Trump. So  
14 we could operate as a political entity, but not as a  
15 non-profit. So we didn't have to jump through the  
16 hurdles of nonprofit compliance. We operated as an  
17 LLC, but we didn't generate any profits almost  
18 intentionally.

19 When we did not see the business operating a  
20 consulting firm for profit, we then move into, you  
21 know, selling airtime to politically minded of -- I'll  
22 say there's one group called NF -- New Federated State  
23 of China, and they're a political organization  
24 promoting democracy in China. And we would sell them  
25 airtime on various networks.

1           That kind of fizzled on for a period of  
2 time, a little over a year until that kind of fizzled  
3 out and they went on to do different things. But we  
4 have not had any interaction with the airtime sales of  
5 consulting in almost a year at this point.

6           JUDGE KLUKAS: And how long have you known  
7 Mr. Fitzgerald?

8           THE WITNESS: I've known Mr. Fitzgerald  
9 since 2022, actually. Probably --

10          JUDGE KLUKAS: How did you meet him?

11          THE WITNESS: -- 2021. I ran into Stan  
12 Fitzgerald intermittently during my campaign for the  
13 2022 cycle. And I do believe I met with him in the  
14 October, November period. Before then, I was not  
15 really involved with him, but I understood he was  
16 helpful in Georgia politics. I reached out to him for  
17 some advice on how to run my campaign.

18          JUDGE KLUKAS: Okay.

19          THE WITNESS: As a grassroots candidate.

20          JUDGE KLUKAS: All right. Thank you, sir.

21 Cross-examination?

22          MR. DEFILIPPO: Yes, Your Honor. Brief.

23          JUDGE KLUKAS: Just speak loud.

24          MR. DEFILIPPO: We'll do my video since it's  
25 not long.

## 1 CROSS-EXAMINATION

2 BY MR. DEFILIPPO:

3 Q Okay. Mr. Craig, you mentioned that you  
4 voted Ms. Wong out of both organizations. Was that in  
5 May 2023?6 A Yeah, I think it's May 30th. That date  
7 comes about in my mind. I'm going straight from  
8 memory here, but I believe it was May 30, 2023.9 Q And that was due to her alleged mishandling  
10 of a bank account or funds in an account?11 A She -- the judge sustained the objection on  
12 the relevance of the account, but yeah, that was the  
13 malfeasance and the inability to actually do the job  
14 that she promised that she'd do, (inaudible) for  
15 setting up the kickoff party and managing the affairs  
16 of that, so --

17 Q Right.

18 A -- she seemed incompetent.

19 Q Would -- and you and Stan were unhappy with  
20 that, with her performance with regard to the account;  
21 is that correct?

22 A Yeah. That's a nice way of putting it.

23 Q Is that why Stan accused her of being a  
24 Chinese spy for the Communist Chinese government?

25 A I don't believe I've ever heard Stan

1 publicly say anything about Ms. Wong being a Chinese  
2 spy or being an agent of the Chinese government.

3 Q But you did hear him privately make those  
4 accusations to you; right?

5 A As a member of our organization, we have a  
6 lot of discussions with vetting people and when people  
7 are vetting others from our organization. I would say  
8 internally between us, we have had conversations  
9 questioning motives, questioning purpose and  
10 affiliation. So with all ideas and brainstorming,  
11 that did come up as a potential.

12 Q Okay. But you're not aware of the multiple  
13 press releases attributed to Mr. Fitzgerald that  
14 accused Ms. Wong of being a spy for China? You're not  
15 aware of those?

16 A I don't think those exist.

17 Q You don't think those exist. What about the  
18 numerous publications of Ms. Wong being a prostitute?  
19 Was that also because of the -- her inability to host  
20 that party for you guys?

21 A Are you asking me why she's a prostitute or  
22 --

23 Q No. I'm asking you why -- if that's why you  
24 made those allegations that she was one due to your  
25 dispute with Ms. Wong over the handling of a business

1 account? Was that the reason behind these allegations  
2 of her being a prostitute?

3 A No. Those are not related at all. I don't  
4 think there was any real allegation that she was a  
5 prostitute. I don't -- I'm not familiar with any  
6 allegation that she was a prostitute.

7 Q Okay. What about the accusation that she  
8 was sleeping with a witness?

9 UNIDENTIFIED SPEAKER: This is it. This is  
10 all from (inaudible).

11 MR. DEFILIPPO: Okay. Where is this?

12 BY MR. DEFILIPPO:

13 Q Okay. What about allegations that she was  
14 using tactics -- she secretly tried for a restraining  
15 order, that Wong, acting pro se, attempted to secure  
16 restraining order. So posts from your organization L-  
17 Strategies regarding this very case. Are you aware of  
18 those posts about Ms. Wong?

19 A Not really sure what you're asking me. Can  
20 you concisely put that together?

21 Q Yeah. You worked for L-Strategies as you  
22 testified before; right, sir? You worked for L-  
23 Strategies; right, sir?

24 A Yes.

25 Q Do you recall a post from your press page of

1 L-Strategies accusing Ms. Wong of many things, but  
2 just for a little sample here, of trying to secretly  
3 get a restraining order -- securing a restraining  
4 order with false evidence and committing perjury  
5 before the Court? Do you recall a recent press  
6 release from your company stating that in reference to  
7 the very hearing that we're in right now?

8 A Stating that she pro se filed this action?

9 Q Yep. And that she used false evidence and  
10 that she was denied already twice by the Court. Are  
11 you aware of that recent press release regarding this  
12 very case that we're talking in right now?

13 A I believe that was -- yes. I mean, she --  
14 that's exactly our defense and our stance on this is  
15 that she's made this allegation falsely with a bunch  
16 of nonsense, that it's not true. And she's grasping  
17 at straws trying to, I guess, find relevance. I'm not  
18 sure.

19 Q Maybe because she's a spy; right?

20 A Not for me to decide.

21 MR. DEFILIPPO: Okay. No further questions  
22 for this gentleman.

23 JUDGE KLUKAS: Mr. Craig, currently, what is  
24 your relationship with Mr. Fitzgerald?

25 THE WITNESS: Mr. Fitzgerald and I are

1 affiliated in the Association of Veterans for America  
2 First. And we are a grassroots organization that  
3 promotes America First candidates through a group of  
4 volunteers of first responders, veterans, advocates  
5 like myself, who are promoting, free of charge,  
6 candidates who are the America First policy and  
7 promoting that policy at every level. We've made  
8 films (crosstalk) --

9 JUDGE KLUKAS: So let me jump in because  
10 we're short on time. So currently, you're both  
11 officers or you're co-owners? What are you guys?

12 THE WITNESS: I'm the Georgia president and  
13 I'm the national vice president. Stan is the  
14 educational guy. He's the one in charge of educating  
15 the public, and he is an officer that assists in  
16 gathering information about candidates and the America  
17 First policy and how to affect the agenda.

18 JUDGE KLUKAS: And so Mr. Fitzgerald is the  
19 education person. And what is the -- is the  
20 organization intended to propel veterans into public  
21 office?

22 THE WITNESS: Some. If they're America  
23 First-minded. And also those candidates will vote to  
24 promote veterans' issues because there's a lot of  
25 veterans who are not Republican or conservative, and

1 there's a lot of good candidates who also promote the  
2 America First agenda that benefits veterans. So it's  
3 kind of a two-piece.

4 JUDGE KLUKAS: Okay. Are you a veteran,  
5 sir?

6 THE WITNESS: I'm not a veteran. I'm an  
7 advocate for veterans and I have made that very clear.

8 JUDGE KLUKAS: Okay. All right. Thank you  
9 very much for your testimony this afternoon. You're  
10 free to disconnect.

11 THE WITNESS: Thank you.

12 JUDGE KLUKAS: Okay.

13 MR. DEFILIPPO: Your Honor, before the  
14 respondent resumes, can I briefly grab my charger? My  
15 cell phone or my laptop charger? Someone bought it  
16 for me from my office.

17 JUDGE KLUKAS: Yes. Sure.

18 MR. DEFILIPPO: Thank you.

19 JUDGE KLUKAS: All right. Mr. Smith, call  
20 your next witness.

21 MR. SMITH: May I?

22 JUDGE KLUKAS: Go ahead.

23 MR. SMITH: I'm sorry, Judge.

24 JUDGE KLUKAS: When you're ready.

25 MR. SMITH: I apologize.

1 JUDGE KLUKAS: No worries.

2 DIRECT EXAMINATION

3 BY MR. SMITH:

4 Q Mr. Fitzgerald, where did you meet Angie  
5 Wong?

6 A That was in 2022 of January at the southern  
7 border in Texas. I had taken a candidate, Mallory  
8 Staples, for Congress to the southern border. Ms.  
9 Wong testified she was there at the invitation of the  
10 Washington Examiner. That would be (inaudible), who's  
11 not an editor. And Wong wanted to interview my  
12 candidate for political endorsement to BlackPAC, and  
13 that's where I first met Wong.

14 Q And what did you understand Ms. Wong to be  
15 involved in when you first met her? What sort of line  
16 of work?

17 A She was the vice president of BlackPAC where  
18 she drew funds as a salary, or she drew funds. I  
19 assumed it was a salary of BlackPAC Political Action  
20 Committee. At the time, she was vice president.

21 Q Okay. And what have you known Ms. Wong to  
22 be involved in from 2022 to 2024 in terms of her  
23 occupation and career?

24 A She wanted to be a commentator on the news.  
25 She had a media booker named Joshua Delano, who booked

1 her on media appearances. So she was deter -- by the  
2 term "a pay-to-play commentator" in that business.  
3 She was not hired or requested. She solicited with  
4 being a customer, and she was involved with working on  
5 political campaigns as well as fundraising.

6 Q And, Mr. Fitzgerald, did you form the  
7 angiewongccp@proton.me email address?

8 A No. It's the first time I've seen it when  
9 she put it on a WordPress document and presented it to  
10 the Court.

11 Q And did you form the Lois Lane email that  
12 was tendered into evidence in this case?

13 A No. This is the first time I seen it when  
14 she put it on a WordPress document and submitted it to  
15 the Court as evidence.

16 Q Have you attempted to access Ms. Wong's  
17 Google account?

18 A No.

19 Q Have you attempted to access Ms. Wong's  
20 Facebook account?

21 A No. I wouldn't even know how.

22 Q And have you ever gone to Ms. Wong's home?

23 A I don't know where she lives and neither do  
24 the processors we hire.

25 Q Okay. Did you ever slash any tires

1 belonging to Ms. Wong?

2 A No.

3 Q Did you --

4 JUDGE KLUKAS: Mr. Fitzgerald, the email  
5 that we received in our office has her address.

6 THE WITNESS: That's not her address  
7 according to process servers, but yes, I sent that  
8 email to your office from my email address, which is  
9 the email I always use, my AOL email address.

10 JUDGE KLUKAS: Right. You just said you  
11 don't know where she lives.

12 THE WITNESS: That's her posted address.  
13 No. I don't know if she lives there or not. That's  
14 what's on her driver's license.

15 JUDGE KLUKAS: Got you.

16 BY MR. SMITH:

17 Q And have you ever gone to the office of  
18 Swire Properties?

19 A No. I don't even know where it is.

20 MR. SMITH: No further questions.

21 MR. DEFILIPPO: May I cross, Your Honor?

22 JUDGE KLUKAS: Go ahead.

23 CROSS-EXAMINATION

24 BY MR. DEFILIPPO:

25 Q Mr. Fitzgerald, please don't take offense by

1 these questions. I have to ask them of all of  
2 deponents in this situation or witnesses in this  
3 situation. But have you been convicted of any felony,  
4 sir?

5 A Yes, I have.

6 Q Were they felonies or were they crimes  
7 involving dishonesty or both?

8 A I was convicted of fraud 20 -- an  
9 investigation that started 25 years ago. On October  
10 13, 1999, the FBI executed a search warrant at my  
11 house, whereafter, they accused me of turning a blind  
12 eye to the fraud that other people were committing.  
13 And 58 months later, I was charged with a crime after  
14 two US attorneys declined to prosecute, and an OPR  
15 investigation into the FBI agent's investigation.  
16 They used a low-level environmental prosecutor who  
17 threatened my mother with jail time over \$20,000 in  
18 tax evasion. So I pled guilty to something I did not  
19 do.

20 Q So that was a felony and a crime involving  
21 dishonesty. They were both -- they were one and the  
22 same?

23 A As far as I know, there's no such criminal  
24 charge as dishonesty.

25 Q Okay. And so you are in charge of the

1 Veterans for America First organization at this time,  
2 are you not?

3 A No. I'm an officer on the National Board.

4 Q Okay.

5 A I'm not in charge.

6 Q You're familiar with pr.com? Right, sir?

7 A PRLog? Yes.

8 Q Okay. And you used it to create numerous  
9 press releases, not necessarily regarding Ms. Wong,  
10 but in general in your day to day with VFAF; is that  
11 right?

12 A We have nine people that have access to  
13 create press releases. Yes, sir.

14 Q And -- but none of those people produced any  
15 of the press releases we saw today in evidence or at  
16 the last hearing regarding Ms. Wong, though; right?

17 A Why don't you ask me a specific question,  
18 Counsel?

19 Q Did you put out those press releases?

20 A Which one?

21 Q The ones from pr dot -- PRLog that you said  
22 you were aware of regarding Ms. Wong.

23 A Which press releases? You presented more  
24 than one PRLog.

25 Q Did you produce any of the ones presented in

1 evidence today to the Court or at -- or the last  
2 hearing?

3 A I've submitted press releases, but none of  
4 them talk about CCP or prostitutes. So I'm not sure  
5 what you're asking me still, because I'm a little  
6 confused because you submitted nine press releases.

7 Q So the press releases that involve  
8 prostitution or CCP spy, those were not from you, but  
9 the other ones were?

10 A They don't exist, sir.

11 Q They don't exist?

12 A There's no press releases that talk about  
13 allegations like that against Ms. Wong.

14 Q Okay. You were also --

15 A Press releases are permanent, by the way.  
16 If they existed, you'd be able to present them.

17 Q Right. So all of the press releases that we  
18 introduced in the Court's file today, none of those  
19 that involved prostitution or being a spy, none of  
20 those were from you; right?

21 A There's no press releases that say that. I  
22 don't know what you're talking about.

23 Q Okay. In September of 2023, you're stating  
24 you did not physically go to the Swire Properties  
25 office here in Miami to confront Ms. Wong's husband?

1 That's your testimony?

2 A I was in Tampa or Jacksonville Beach. Those  
3 are only places in Florida I go.

4 Q So that was not -- the person identified as  
5 salt and pepper hair, would have been heavysset, who  
6 came in asking for Ms. Wong's husband, that person was  
7 not you; right, sir?

8 A Sounds like a description of our process  
9 server when Ms. Wong was ducking process.

10 Q Okay. So again, is it yes or no?

11 A Not me.

12 Q Okay.

13 A No.

14 Q So the email that came either shortly before  
15 or shortly after that visit to multiple people at  
16 Swire that accused Ms. Wong of criminal activity and  
17 of being a CCP spy and of being a prostitute, what is  
18 your knowledge of that? I'm certain you don't know  
19 anything about it.

20 A I've already testified today, actually, the  
21 first time I saw that was in Court here.

22 Q Okay. Sir, you live in Acworth, Georgia;  
23 correct?

24 A I do.

25 Q So when you look at the Exhibit 12, which is

1 an attempt to hack Ms. Wong's Facebook coming out of  
2 Acworth, Georgia, that's just a big coincidence; right  
3 sir?

4 JUDGE KLUKAS: It's Exhibit 9 for the  
5 record.

6 BY MR. DEFILIPPO:

7 Q I'm sorry. Exhibit 9, that's just a big  
8 coincidence?

9 A As a retired police detective who's  
10 testified under oath as far as being an expert in  
11 investigations and evidence, you're presenting a copy-  
12 and-paste piece of evidence that shows nothing. So my  
13 testimony is, no, that's not me. And that's not real.

14 Q So you don't believe at all that anyone  
15 attempted to hack Ms. Wong?

16 A I have no idea who attempted to hack Mrs.  
17 Wong if that's even true.

18 Q Since this hearing started, or since these -  
19 - this proceeding started, you've made some retweets  
20 that discussed the hearing itself. Isn't that right?

21 A That is false. I've been -- haven't said  
22 anything about Ms. Wong since I've been served with  
23 this -- whatever you call this process of this  
24 process.

25 Q So any press releases that came out of L-

1 Strategies press department that discussed this case,  
2 that would not have been from you?

3 A The only person who discussed this case  
4 publicly since it started was Butch Conz.

5 Q So again, any press releases come --

6 A I did not submit any press release about  
7 this case, and there's not on the L-Strategies website  
8 because I was just looking at it when Angie testified  
9 there was.

10 Q So if I were to show you one right now,  
11 would you -- you are going to say that that's not from  
12 your website?

13 A How do you know what I'm going to say  
14 without showing it to me?

15 Q Okay.

16 A Feel free to show it to me. I'll give you  
17 an answer.

18 Q So I apologize for the format. Do you have  
19 any objection of me showing it to you from a cell  
20 phone right now?

21 A Not if I could see the link to the website.

22 Q I think you'll be able to do that.

23 A All right. I'll take a look.

24 Q We see a link to the website right down  
25 there; right?

1           A     Yes.

2           MR. DEFILIPPO:  May I approach your witness?

3           MR. SMITH:  Yes.

4           MR. DEFILIPPO:  Your client.  Hold on.  Let  
5 me just get that off there.  There we go.  Okay.  If  
6 you can, please just keep that open.  Don't  
7 (crosstalk) --

8           THE WITNESS:  I'm -- you're showing me a  
9 screenshot.  You're not showing me a link to a  
10 website.

11          MR. DEFILIPPO:  So --

12          THE WITNESS:  I can't even read it.

13          BY MR. DEFILIPPO:

14          Q     Okay.  I'm going to try to go back to it  
15 because you --

16          A     The website is active.  I looked at it when  
17 you testified --

18          MS. WONG:  Because he removed it.

19          BY MR. DEFILIPPO:

20          Q     Okay.  So this here, if you look at the top,  
21 go ahead and tell me, what does it say there at the  
22 top of the screenshot from the website?

23          A     That looks like the L-Strategies website.

24          Q     Okay.  So I'll give you a chance to read it  
25 without touching or changing the picture.

1           A     Would you like me to read it out loud for  
2 the record --

3           Q     Would I give you a chance to read it  
4 privately and --

5           A     Would you like me to read it for the record  
6 or you want me just to read it myself?

7           Q     I'd like you to read it yourself, and then  
8 answer the question as to whether or not that came  
9 from you during the pendency of this case.

10          A     I got a medical issue. Excuse me for my --

11          Q     Take your time.

12          A     -- hand shaking. I don't recall reading  
13 this ever on our website if it's still there. You  
14 have to ask Jared Craig.

15          Q     So you're saying Jared Craig must have done  
16 it? Not you?

17          A     No. I didn't say that. I said I don't  
18 recall reading it. And you'd have to ask Jared Craig.  
19 That's what I said.

20          Q     Okay. Now, sir, your handle on Twitter is  
21 Stanfitz30101. Is that right?

22          A     No, it's not. It's @realsfitzgerald, and it  
23 has a blue verified check mark.

24          Q     Do you have more than one handle?

25          A     I have @theveteransforamericafirst handle,

1 which is at -- I'm not even sure what that is, but  
2 it's the -- it is a gold check mark verified account.

3 Q So if I showed you an account that says Stan  
4 Fitzgerald with an S, not a Z, but it has your picture  
5 and it's @stanfitz30101, would that be you, sir?

6 A That is not me.

7 Q So if I may, this is someone purporting to  
8 be you; right?

9 A That is someone pretending to be me.

10 Q Okay. Understood. Your office is in  
11 Paulding, Georgia; right, sir?

12 A My wife's business is in Paulding County,  
13 Georgia.

14 Q Do you have an office in Paulding County,  
15 Georgia?

16 A It's a warehouse. It's not an office. My  
17 office is in my home.

18 Q So your wife's warehouse is in Paulding  
19 County or your warehouse is in Paulding County?

20 A There's a warehouse for Something Special,  
21 LLC, in Paulding County, Georgia. 31 Sparks Drive,  
22 Hiram, Georgia 30101.

23 Q Okay. So you're aware of some of the  
24 wrongdoing that Ms. Wong has uncovered at L-Strategies  
25 when she was working at L-Strategies?

1           A     Actually, we caught her embezzling from us  
2 and we sued her. And what she did now was in response  
3 to those allegations.

4           Q     You also caught her being a Chinese spy; is  
5 that right?

6           A     I never said she was a Chinese spy.

7           Q     Okay. So L-Strategies, she uncovered some  
8 wrongdoing. Is it -- is your testimony that yes, she  
9 did, or no, she did not uncover some wrongdoing in L-  
10 Strategies?

11          A     No. She put out paid press that there was  
12 wrongdoing in conjunction with a lawsuit she filed in  
13 Palm Beach County.

14          Q     Had her allegations been true about the  
15 wrongdoing in L-Strategies, that may have implicated  
16 your parole conditions; right, sir?

17          A     You're talking about something from 25 years  
18 ago. You are an attorney; correct?

19          Q     I'm asking you --

20          A     Have you ever heard of anybody on parole for  
21 25 years?

22          Q     Conditions of release, perhaps federal case  
23 of that nature.

24          A     I'm not on any supervised release of parole.  
25 That's fictitious.

1 Q So you were not at all afraid of Ms. Wong  
2 exposing your wrongdoings and us getting you in  
3 trouble again with the law?

4 A Well, first of all, you're testifying for  
5 her. There was no wrongdoings. Again, Jared Craig  
6 and myself discovered wrongdoings from her. And we  
7 have plenty of evidence right on the website that you  
8 referred to, including an admission by Joshua Delano  
9 that she diverted funds, which is embezzlement.

10 Q I know you dispute the merit of her claims  
11 of wrongdoing, but she did make some; right, sir?

12 A Counsel, I've testified hundreds of times.  
13 You're trying to trick me and trap me in something to  
14 confuse me. It's not going to work.

15 Q I'm asking a yes or no question.

16 A Ask it again because I got distracted --

17 Q Okay.

18 A -- answering your methods.

19 Q So I know you disagree with the merit of her  
20 allegations, but she did raise some allegations  
21 regarding wrongdoing of you at L-Strategies when she  
22 worked there; right?

23 A Right.

24 Q So yes?

25 A She also testified that she had no access to

1 the L-Strategies banking. So how would she know?

2 Q Was that a yes, sir, or no?

3 A Did she make allegations?

4 Q Yes.

5 A Yeah, she made allegations.

6 Q Those allegations, if true, could have  
7 caused problems for you; right, sir?

8 A What kind of problems?

9 Q Perhaps with the law, based on your  
10 conviction for fraud. Maybe that.

11 A Not worried about it at all because I didn't  
12 have access to the bank account and we did not take  
13 any money. Angie did.

14 MR. DEFILIPPO: Okay. Do you have any more  
15 questions you want to ask?

16 UNIDENTIFIED SPEAKER: No. Keep going. You  
17 doing great.

18 MR. DEFILIPPO: I have no further questions  
19 for this witness, Your Honor. Thank you.

20 JUDGE KLUKAS: Okay. Any redirect?

21 MR. SMITH: Nothing, Judge.

22 JUDGE KLUKAS: Okay. I don't think I have  
23 any further questions. Does either side wish to put  
24 forward any more testimony or anything else before I  
25 make a ruling?

1 MR. DEFILIPPO: Your Honor, the three items  
2 of evidence that we wanted to introduce before that we  
3 were not able to, I would like to be able to print  
4 them for Your Honor, instead of handing you my screen.  
5 Can I email them to your JA? Is that possible?

6 JUDGE KLUKAS: And have us print it for you?  
7 No, Counsel. You're --

8 MR. DEFILIPPO: I want just, you know,  
9 review --

10 JUDGE KLUKAS: Unless you want me to take  
11 your laptop and put it with the case file --

12 MR. DEFILIPPO: No.

13 JUDGE KLUKAS: -- in the vault.

14 MR. DEFILIPPO: No, no. Thank you, Your  
15 Honor.

16 JUDGE KLUKAS: Okay. And then you can stand  
17 on your testimony.

18 MR. DEFILIPPO: We can stand on our  
19 testimony and the multiple exhibits that we've  
20 introduced already.

21 JUDGE KLUKAS: All right, folks. Give me a  
22 few minutes and I'll be back with everyone.

23 MR. DEFILIPPO: And do you have a copy of  
24 the case law that we were asking for you to look at,  
25 Thoma versus O'Neal?

1 JUDGE KLUKAS: Yes, I do.

2 MR. DEFILIPPO: Okay. Thank you. Do you  
3 know which outlet works in this general region in  
4 these two?

5 JUDGE KLUKAS: Check the wall.

6 (A RECESS WAS TAKEN.)

7 JUDGE KLUKAS: Please take a seat. Okay.  
8 All right. We're on the record in Case 2024-19469-FC-  
9 04, Wong versus Fitzgerald. I've been asked to enter  
10 a final permanent injunction on the basis of stalking.  
11 In order to enter a final permanent injunction, the  
12 law requires a course of conduct, which as both sides  
13 I know are aware is at least two instances of conduct  
14 or more for no legitimate purpose, and that causes  
15 substantial emotional distress to the victim.

16 Florida law has a very high standard for  
17 what substantial emotional distress means. It's not  
18 ordinary annoyance. It is -- as the law says,  
19 Floridians don't suffer emotional distress lightly.  
20 After having heard the evidence throughout the last  
21 two days of hearing, and after reviewing the exhibit  
22 submitted by both sides, I do find that Petitioner has  
23 established a case for stalking in accordance with  
24 Florida law, and I will be entering a final permanent  
25 injunction in her favor. I'm going to give you my

1 findings for the record.

2 With respect to a course of conduct, upon  
3 reviewing the at least 18 exhibits that the petitioner  
4 put forward, including the three that this Court did  
5 not review because they were not provided in printed  
6 copy, but the Court received testimony on those, it is  
7 evident that Mr. Fitzgerald has engaged in a campaign  
8 of harassment towards the petitioner throughout the  
9 last two to three years.

10 If this Court had any doubt with respect to  
11 the allegations being made by the petitioner, they  
12 were corroborated by the emails that chambers received  
13 on December 23rd, on February 2nd, and on February 15  
14 from an email that Mr. Fitzgerald conceded to be his  
15 containing the very same allegations, and the very  
16 same regurgitated falsities that the petitioner put  
17 forward in this case, including that Ms. Wong is a  
18 prostitute, that she is a Chinese spy, that she has  
19 multiple FBI investigations against her and so on and  
20 so forth.

21 None of that was substantiated by Mr.  
22 Fitzgerald, nor was there any evidence put forward of  
23 an actual FBI investigation ever taking place. I do  
24 not find that any of that language is protected  
25 speech. It is not political speech and in totality,

1 amounts to harassment. I also find that the  
2 allegations in the petition establish a course of  
3 conduct in addition to the various emails that have  
4 been sent. Number one, the incident at Swire, I do  
5 find the petitioner put forth substantial competent  
6 evidence that she's a victim of stalking with respect  
7 to that incident.

8           And the -- you know, the standard here is  
9 preponderance of the evidence. She provided testimony  
10 that her husband received a visitor, shortly there --  
11 fitting the respondent's description and shortly  
12 thereafter, her husband, along with every superior at  
13 Swire properties, received an email containing again  
14 the same allegations that the undersigned received on  
15 the dates that I mentioned earlier.

16           The petitioner put forth evidence concerning  
17 -- or her testimony concerning her tire being blown  
18 out on five separate occasions. Again, there was no  
19 direct link with respect to what happened, but all  
20 falling within the same time range as she's having  
21 these incidents, and the emails that are going --  
22 flowing from the respondent.

23           So this Court found that persuasive. With  
24 respect to the incidents in social media, this Court  
25 reviewed numerous posts by accounts either controlled

1 by Mr. Fitzgerald or one directly attributed to Mr.  
2 Fitzgerald, again, showing a pattern of harassment.  
3 The incident that occurred where Ms. Wong received a  
4 message saying that somebody in -- where in Georgia?

5 MR. SMITH: Acworth.

6 JUDGE KLUKAS: Acworth, Georgia, trying to  
7 access her account is far too coincidental given that  
8 Mr. Fitzgerald lives in Acworth, Georgia. Again,  
9 standing alone, perhaps not persuasive, but taking --  
10 taken in the totality of circumstances, I do find that  
11 that further sets a course of conduct.

12 Again, number four, in the petitioner's  
13 amended petition, false FBI investigation claims --  
14 numerous claims of an ongoing FBI investigation.  
15 Again, this Court received zero evidence of an FBI  
16 investigation ever having taken place. And of course,  
17 I received those allegations -- the very same  
18 allegations at chambers.

19 In addition to all of that, I find that both  
20 of the petitioner's witnesses were very credible.  
21 They were both independent and had no affiliations to  
22 the petitioner. They both put forward testimony of  
23 having heard Mr. Fitzgerald make disparaging comments  
24 and engage in a campaign of harassment against Ms.  
25 Wong.

1           Moreover, I do not find that it is  
2 coincidental that both witnesses received threatening  
3 or harassing, I will say, communications prior to  
4 providing testimony in this proceeding, both in the  
5 prior date. And Mr. Conz, who provided testimony  
6 today that he received messages via social media, even  
7 though I understand the respondent denies any  
8 affiliation to the account that posted the messages.

9           None of the evidence put forward by the  
10 petitioner was rebutted by the respondent, not through  
11 his own testimony and certainly not through the  
12 testimony of his sole witness. I do not find the  
13 testimony of Mr. Craig credible. He is a associate of  
14 the respondent. He in fact claimed ownership of the  
15 website responsible for publishing all of the same  
16 allegations, and all of the same disparaging  
17 communications about Ms. Wong.

18           Those are all owned by Mr. Craig. So I  
19 don't find that anything that he said was credible.  
20 In fact, I find them responsible for many -- for  
21 facilitating many of the postings that were made in  
22 this case, and his testimony had no weight in this  
23 case. For all of these reasons, the Court does find  
24 that a final permanent injunction of indefinite  
25 duration is appropriate. And I'll be entering that

1 today. Mr. Fitzgerald, sir?

2 MR. FITZGERALD: Yes, ma'am.

3 JUDGE KLUKAS: That means there's to be no  
4 contact whatsoever with the petitioner.

5 MR. FITZGERALD: Yes.

6 JUDGE KLUKAS: Not directly, not indirectly,  
7 not through third parties, not electronically, not in  
8 person. If you happen to see her coincidentally at a  
9 political event, you cannot go anywhere near her. You  
10 must remain 500 feet away from her at all times. Do  
11 you understand?

12 MR. FITZGERALD: Yes, ma'am.

13 JUDGE KLUKAS: And I didn't mention the  
14 substantial emotional distress. Just for purposes of  
15 the record, I do find that all of this has caused the  
16 petitioner substantial emotional distress. There are  
17 many instances where her children's phone numbers were  
18 published, where her home address was sent out. This  
19 Court received communications containing her home  
20 address or what purports to be her home address.

21 And all of this went to attack her political  
22 credibility as a commentator, as a fundraiser, and as  
23 an operative in the Republican Executive Committee.  
24 So all of these things not only threaten her  
25 livelihood, have made her life very difficult for the

1 last two to three years given the constant campaign of  
2 harassment.

3 So I do find her testimony credible with  
4 respect to that, and I do find that she established a  
5 case for substantial emotional distress. I hadn't put  
6 that on the record. So going back to Mr. Fitzgerald,  
7 the contact cannot be direct and it cannot be  
8 indirect. It cannot be through L-Strategies, it  
9 cannot be through any other website or entity that you  
10 have any affiliation with. You understand that, sir?

11 MR. FITZGERALD: I do.

12 JUDGE KLUKAS: Okay. Is there anything else  
13 I need to address?

14 MR. DEFILIPPO: Nothing from the petitioner,  
15 Your Honor.

16 JUDGE KLUKAS: All right. Thank you very  
17 much. I'm going to ask if you want to receive a copy,  
18 you can wait.

19 MR. SMITH: Okay.

20 JUDGE KLUKAS: But I'll ask the petitioners  
21 to leave first and then Mr. Fitzgerald to follow, and  
22 we will need liaison to serve him.

23 MR. SMITH: Yes.

24 JUDGE KLUKAS: Okay.

25 MR. DEFILIPPO: Thank you, Your Honor.

1 JUDGE KLUKAS: Thank you, everyone.

2 (TRIAL CONCLUDED)

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## 1 CERTIFICATE OF TRANSCRIPTIONIST

2  
3 I, Micah Hodgens, Legal Transcriptionist, do  
4 hereby certify:

5 That the foregoing is a complete and true  
6 transcription of the original digital audio recording  
7 of the testimony and proceedings captured in the  
8 above-entitled matter. As the transcriptionist, I  
9 have reviewed and transcribed the entirety of the  
10 original digital audio recording of the proceeding to  
11 ensure a verbatim record to the best of my ability.

12 I further certify that I am neither attorney  
13 for nor a relative or employee of any of the parties  
14 to the action; further, that I am not a relative or  
15 employee of any attorney employed by the parties  
16 hereto, nor financially or otherwise interested in the  
17 outcome of this matter.

18 IN WITNESS THEREOF, I have hereunto set my  
19 hand this 16th day of April, 2025.

20  
21  
22 *Micah Hodgens*

23 Micah Hodgens  
24  
25