

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

NO. 2922

IN THE INTEREST OF) IN THE DISTRICT COURT
)
TERESA JEFFS,) SCHLEICHER COUNTY, TEXAS
)
A CHILD) 51ST JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF
WILLIE JESSOP
JANUARY 29TH, 2009

ORAL AND VIDEOTAPED DEPOSITION OF WILLIE JESSOP,
produced as a witness at the instance of the Attorney Ad
Litem for Teresa Jeffs, and duly sworn, was taken in the
above-styled and numbered cause on JANUARY 29TH, 2009,
from 9:39 a.m. to 12:29 p.m., before Tim Fails, CSR in
and for the State of Texas, reported by machine
shorthand, at the San Angelo County Courthouse, City of
San Angelo, County of Schleicher, State of Texas,
pursuant to the Texas Rules of Civil Procedure.

1 A P P E A R A N C E S

2

3 COUNSEL FOR THE WITNESS

4 MR. KENT A. SCHAFFER
BIRES & SCHAFFER
5 JPMorganChase Bank Building
712 Main Street, 31st Floor
6 Houston, Texas 77002
713.228.8500
7 ZACKYMAX@AOL.COM

8 AND

9 CO-COUNSEL WITH MR. SCHAFFER

10 MR. BRIAN W. WICE
ATTORNEY AT LAW
11 The Lyric Centre
440 Louisiana, Suite 900
12 Houston, Texas 77002-1635
713.524.9922
13 wicelaw@worldnet.att.net

14

15 ATTORNEY AD LITEM FOR TERESA JEFFS

16 MS. NATALIE E. MALONIS
REIB Law
17 1173 Bent Oaks
Suite 200
18 Denton, Texas 76210
940.591.0600
19 Natalie@reiblaw.com

20 AND

21 CO-COUNSEL WITH MS. MALONIS

22 MS. ANGELA N. BASKERVILLE
ATTORNEY AT LAW
23 2019 Broadway
Suite B
24 Lubbock, Texas 79401
806.687.2002

25

1 (APPEARANCES CONTINUED)

2

3 COUNSEL FOR JOSEPH JEFFS

4 MR. JONATHAN R. DAVIS
5 MR. BRANDON S. ARCHER
6 Shannon Porter & Johnson
7 317 West Concho Street
8 San Angelo, Texas 76902
9 325.653.4274
10 Jdavis@shannonporter.com

8

COUNSEL FOR ANNETTE JEFFS

9

10 MS. MINDY MONTFORD
11 270 One Northpoint Central
12 6836 Austin Center Boulevard
13 Austin, Texas 78731
14 512.478.1657
15 Mindy@montfordlaw.com

13

TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES

14

15 MR. TREVOR A. WOODRUFF
16 Appellate Attorney
17 2401 Ridgepoint Drive
18 Building H-2
19 Austin, Texas 78754
20 512.929.6830
21 Cell 512.788.2553
22 Trevor.Woodruff@dfps.state.tx.com

19

ALSO PRESENT:

20

21 THE HONORABLE BARBARA WALTHERS (By Telephone)
22 MS. ANNETTE JEFFS
23 MS. CONNIE GAUWAIN, CASA/GAL
24 MS. SHIRLEY DAVIS
25 Ms. MELODYE MCCARTY, CPS
MR. JAMES DEEL, Videographer

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

PAGE

Appearances..... 2

WITNESS:

WILLIE JESSOP

EXAMINATION:

BY MS. MALONIS 7
BY MR. DAVIS 93
BY MS. WOODRUFF 96

Signature and Changes..... 98

Reporter's Certificate..... 100

EXHIBITS

NO. DESCRIPTION PAGE

(Exhibits retained by Counsel and the Court)

CERTIFIED QUESTIONS

PAGE NUMBER LINE NUMBER

QUESTION NO. 1: Page 8, Line 5

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(CERTIFIED QUESTIONS CONTINUED)

QUESTION NO. 1: Page 8, Line 18

QUESTION NO. 1: Page 11, Line 9

(All questions directed specifically certified and/or
questions involving the assertion of privileges)

1 P R O C E E D I N G S

2 VIDEO TECHNICIAN: Here begins the
3 videotaped deposition of William R. Jessop. Today's date
4 is January 26th, 2009. The time is 9:39 a.m. We are on
5 the record.

6 Will counsel please introduce themselves
7 for the record.

8 MS. MALONIS: Natalie Malonis, attorney
9 ad litem for Teresa Jeffs, and Angela Baskerville,
10 co-counsel.

11 MR. DAVIS: Jonathan Davis, attorney for
12 Joseph Jeffs, attorney ad litem.

13 MR. ARCHER: Brandon Archer, co-counsel
14 for Jonathan Davis.

15 MR. WOODRUFF: Trevor Woodruff, counsel
16 for The Department.

17 MS. MONTFORD: Mindy Montford, counsel for
18 Annette Jeffs.

19 MR. SCHAFFER: Kent Schaffer. I represent
20 Willie Jessop.

21 MR. WICE: Brian Wice, co-counsel with
22 Mr. Schaffer on behalf of Mr. Jessop.

23 THE REPORTER: Do you ladies and gentlemen
24 have any particular agreements before I swear the
25 witness?

1 MS. MALONIS: Any particular agreements?
2 I mean, normally we reserve objections to trial other
3 than form, nonresponsive, and leading.

4 MR. SCHAFFER: We are not a party, so --

5 THE REPORTER: Shall I swear the witness?

6 MS. MALONIS: You may.

7 WILLIE JESSOP,
8 having been first duly sworn, testified as follows:

9 EXAMINATION

10 BY MS. MALONIS:

11 Q. Would you go ahead and state your full name for
12 the record?

13 A. William Jessop.

14 Q. Do you have a middle name?

15 A. Roy.

16 Q. I'm sorry?

17 A. Roy.

18 Q. Roy?

19 Do you -- do you sometimes -- is your middle
20 name sometimes referred to as Royce?

21 A. No.

22 Q. No? That's a mistake?

23 If I saw that somewhere that would not be you,
24 or it would be a mistake?

25 A. I answered your question.

1 Q. Can you answer the question, please?

2 A. I gave my name.

3 Q. Are you refusing to answer the question?

4 A. My name is William Roy Jessop.

5 Q. If I saw William Royce Jessop somewhere would
6 that not be referring to you or would it be a mistake?

7 A. I answered your question.

8 MS. MALONIS: Okay. Can you certify that
9 question, please.

10 Q. (By Ms. Malonis) And are you here today
11 pursuant to a subpoena that was received on you?

12 I'm going to hand you what's been marked as
13 Exhibit 1.

14 A. I was here to respond to a subpoena, yes.

15 Q. Okay. Is what I just handed you, does that
16 appear to be that subpoena that was served on you?

17 A. It appears to be.

18 Q. Okay. Are you associated with the FLDS
19 religious organization?

20 MR. SCHAFFER: At this point, upon advice
21 of counsel Mr. Jessop will refuse to answer and invoke
22 his rights guaranteed by the Fifth Amendment of the
23 United States Constitution and remain silent -- he's --
24 as well as the Texas Constitution, but he's doing so
25 based on the fact that there are ongoing criminal

1 investigations being conducted by the state and federal
2 government.

3 MS. MALONIS: Okay. Are you instructing
4 him not to answer?

5 MR. SCHAFFER: I'm instructing him not to
6 answer.

7 Q. (By Ms. Malonis) Okay. Are you not going to
8 answer the question?

9 A. I will follow the legal advice of my counsel.

10 Q. Okay. Are you -- do you fear that answering
11 that question directly would incriminate you?

12 A. That's attorney/client privileges.

13 Q. Can you answer the question, please?

14 MR. SCHAFFER: Upon advice of counsel, for
15 the reason I just stated he will not answer that
16 question.

17 MS. MALONIS: He's asserting a Fifth
18 Amendment privilege. I want him to tell me that he's in
19 fear of incrimination, not his counsel. It's got to be
20 his testimony.

21 MR. SCHAFFER: Then he can invoke his
22 right under the Fifth Amendment.

23 Q. (By Ms. Malonis) Can you tell me why you are
24 invoking the -- the Fifth Amendment?

25 MR. SCHAFFER: That calls for an

1 attorney/client privilege. He will not answer that
2 question.

3 MS. MALONIS: Okay.

4 Q. (By Ms. Malonis) By the way, I hear Counsel
5 mentioning the Texas Constitution. From this point
6 forward if you invoke the Fifth we will -- we have an
7 understanding that it's the U.S. Constitution and the
8 Texas Constitution, okay?

9 MS. MALONIS: So there's not a need to --
10 to say that every time.

11 Q. (By Ms. Malonis) Okay. So are you refusing to
12 answer my question?

13 A. I believe your question was answered by my
14 legal counsel.

15 Q. Are you refusing to answer my question? Are
16 you refusing to answer my question?

17 A. Your question was answered -- answered by my
18 legal counsel.

19 MS. MALONIS: Certify that question,
20 please, and note that 15 seconds elapsed without an
21 answer.

22 Q. (By Ms. Malonis) Okay. What is the meaning of
23 an elder within the FLDS organization?

24 MR. SCHAFFER: Upon advice of counsel my
25 client will refuse to answer that question. He has a

1 right to remain silent, which he will invoke pursuant to
2 the United States and Texas Constitutions. Since this is
3 a matter currently under investigation by the state and
4 federal governments he will not respond.

5 Also, I point out that he was subpoenaed
6 in an individual capacity and not as a representative of
7 the church.

8 MS. MALONIS: Okay.

9 Q. (By Ms. Malonis) Are you -- do you fear that
10 answering that question would incriminate you?

11 MR. SCHAFFER: Upon advice of counsel he
12 will refuse to answer that question as well. That calls
13 for not only invoking the Fifth Amendment privilege but
14 also it invades the attorney/client privilege.

15 Q. (By Ms. Malonis) Are you refusing to answer my
16 question? Well, strike that.

17 MS. MALONIS: Let me ask Counsel, are you
18 instructing him not to answer whether he fears -- whether
19 he fears incrimination?

20 MR. SCHAFFER: I just said -- instructed
21 him not to -- not to answer the question and he will not
22 answer it.

23 MS. MALONIS: Okay.

24 Q. (By Ms. Malonis) Are you not going to answer my
25 question? There's a question pending.

1 Will you answer my question or are you refusing
2 to answer my question?

3 MR. SCHAFFER: I've already told you upon
4 advice of counsel --

5 MS. MALONIS: I'm asking your -- I'm
6 asking your witness --

7 MR. SCHAFFER: I've already told you twice
8 upon advice of counsel he will be not be answering the
9 question. You can sit there and ask the same question
10 over and over and over and you are going to get the same
11 answer.

12 MS. MALONIS: Can we not have speaking
13 objections, please?

14 MR. SCHAFFER: Well, if we could move
15 along to something relevant and germane, absolutely.

16 MS. MALONIS: Okay. I object to the
17 sidebar comment.

18 Will you certify that question as well.

19 Q. (By Ms. Malonis) I'm going to hand you what's
20 been marked as Exhibit 2 and ask if you have -- it's
21 entitled El Dorado Investigation. It is dated
22 December 22nd, 2008.

23 I'm going to ask the witness if he has
24 previously seen that report.

25 MR. SCHAFFER: Upon advice of counsel my

1 client will not answer that question. He will invoke his
2 right to remain silent as guaranteed under both the
3 United States and Texas Constitutions. This is based on
4 the fact that there are state and federal investigations
5 that are ongoing at this time.

6 Q. (By Ms. Malonis) Will you answer the question?
7 Can you identify that document?

8 MR. SCHAFFER: Based upon the advice of
9 counsel my client --

10 MS. MALONIS: Excuse me. I'm asking your
11 witness -- I understand your objection. I'm asking your
12 witness.

13 Q. (By Ms. Malonis) Do you -- are you following
14 the advice of counsel?

15 MR. SCHAFFER: You can answer.

16 A. I think that's obvious. I'll be following my
17 advice of legal counsel.

18 Q. (By Ms. Malonis) Is that -- is that a yes?

19 MS. MALONIS: I object to nonresponsive.

20 Q. (By Ms. Malonis) Are you following the advice
21 of counsel?

22 A. Yes, I'll be following the advice of legal
23 counsel.

24 Q. Thank you.

25 VIDEO TECHNICIAN: Excuse me. Could I get

1 you to put the microphone on?

2 MR. SCHAFFER: Sure.

3 Q. (By Ms. Malonis) Are you currently under
4 indictment?

5 MR. SCHAFFER: You can answer.

6 A. No.

7 Q. (By Ms. Malonis) Okay.

8 MS. MALONIS: And can we please not have
9 attorney/client conferences while a question is pending?

10 MR. SCHAFFER: Pursuant to the Rules you
11 can have attorney/client conferences if it involves a
12 matter of invocation of a privilege.

13 MS. MALONIS: Okay. I'm going to have you
14 certify probably all of the questions. We've got a
15 hearing this afternoon so I don't know how quickly you
16 can do that.

17 Okay. May I have the witness look at the
18 document, please.

19 Q. (By Ms. Malonis) Okay. Actually I'm going to
20 take that back from you for a second.

21 MS. BASKERVILLE: Just a second, Judge.

22 MS. MALONIS: Okay. Judge, this is
23 Natalie Malonis. We're -- we're on the record. I'm
24 going to put you on speakerphone if you don't mind, okay?
25 And we've got present -- we've got Willie Jessop and his

1 counsel, Mindy Montford, Annette Jeffs as the Respondent;
2 various members of CASA, Trevor Woodruff from the
3 Department, John Davis, ad litem for Joseph Jeffs and
4 Brandon Archer, his co-counsel, and Angela Baskerville,
5 my co-counsel. And I'm going to put you on speakerphone
6 now. Just hold on.

7 Okay. Can -- can you hear us?

8 THE JUDGE: I can hear you.

9 MS. MALONIS: We have begun the deposition
10 of Willie Jessop and I wanted to get a couple of
11 clarifying matters.

12 No. 1, would you like me to proceed in the
13 same manner as -- as we did with the deposition of Merril
14 Jessop and ask the questions that I want to ask, or would
15 you like me to call you for rulings to compel individual
16 questions?

17 THE JUDGE: Well, I think since we are
18 going to have a hearing this afternoon that it would
19 probably be most efficient if we just -- you went through
20 and asked the questions, let them make their objections,
21 and then I visit with everyone at 2:00.

22 MS. MALONIS: Okay.

23 THE JUDGE: Is that agreeable? Can that
24 work for everybody's schedule?

25 MS. MALONIS: That's agreeable to me if we

1 can have an instruction that Counsel produce the
2 witnesses at the hearing.

3 THE JUDGE: Is there a problem with that?

4 MS. MALONIS: I believe there is. Counsel
5 stated that he would produce the witness if the court
6 ordered him to.

7 MR. SCHAFFER: Well, Your Honor, this is
8 Kent Schaffer for Mr. Jessop. I was told just this
9 morning by Ms. Malonis that there was a hearing at
10 2:00 and I said, Well, if we're ordered to be there, of
11 course we will be there. And so I didn't realize that
12 there was already a hearing set up for Mr. Jessop prior
13 to the time that he was deposed. However, if you are
14 telling us to be there we will, of course, be there.

15 THE JUDGE: Well, Mr. Schaffer, you are
16 technically correct. We didn't have a hearing already
17 scheduled, but I had indicated and I had cleared the rest
18 of my docket that if the witnesses felt the need to take
19 a Fifth Amendment privilege claim, that rather than try
20 to conduct some sort of telephonic hearing that I would
21 prefer that we do it in person at 2:00 today. So --

22 MR. SCHAFFER: Okay.

23 THE JUDGE: -- that would work best for
24 the Court's schedule. I'm in trial or in -- in one of my
25 other out counties at the moment, and is -- is there a

1 reason that you could not come on up to San Angelo for
2 the 2:00 hearing today?

3 MR. SCHAFFER: No, not at all. We are in
4 San Angelo right now. I -- we don't have --

5 THE JUDGE: Oh, you are?

6 MR. SCHAFFER: We don't have a problem
7 being there at 2:00.

8 THE JUDGE: Okay. Okay. Very good.

9 MS. MALONIS: Your Honor, along the same
10 lines, Ms. Hennington is not here today, and as you know
11 she has previously entered an appearance on behalf of
12 Mr. Jessop. I think she was kind of filling in for his
13 counsel, not quite aware of her schedule. She -- I have
14 asked her to confirm that she would have Mr. Merril
15 Jessop at the hearing and have not been able to confirm
16 that.

17 Is there a way for the Court to
18 communicate that to her, to -- to compel Mr. Merril
19 Jessop's attendance at the hearing as well?

20 Your Honor?

21 THE JUDGE: Well, Ms. Malonis, I'm trying
22 to think.

23 MS. MALONIS: Okay.

24 THE JUDGE: This is something that I had
25 not anticipated and, of course, had no way of knowing

1 about it. And since she's not there right now I don't --
2 I don't know exactly what I can do.

3 Is she in trial in Sutton County?

4 MS. MALONIS: I don't know. I don't
5 believe she is. I think that that case pled.

6 THE JUDGE: Okay. You know, I take --
7 I -- I -- did she give you any indication on Friday that
8 they would not attend this afternoon?

9 MS. MALONIS: The only indication I have
10 is that I've asked her to confirm that she would have the
11 witness there and she will not confirm that.

12 THE JUDGE: Well, you know, I can't give
13 an anticipatory ruling on this, so let's -- let's see
14 what happens at 2:00, all right?

15 MS. MALONIS: Yes, ma'am. Thank you.

16 THE JUDGE: Thank you.

17 Q. (By Ms. Malonis) Okay. Was there -- was there
18 a question pending or --

19 THE REPORTER: No. The witness was
20 looking at a document.

21 MS. MALONIS: Okay. Okay. Thank you.

22 Q. (By Ms. Malonis) All right. Have you --
23 Mr. Jessop, have you made media appearances and spoken
24 about an El Dorado investigation?

25 MR. SCHAFFER: Upon advice of counsel my

1 client will refuse to answer and invoke his
2 Fifth Amendment rights as well as his rights under the
3 Texas Constitution. He will refuse to answer based upon
4 the fact that there are pending criminal -- criminal
5 investigations by both the state and federal government.

6 Q. (By Ms. Malonis) Okay. Mr. Jessop, is it your
7 understanding that you are under investigation?

8 MR. SCHAFFER: Upon advice of counsel my
9 client will refuse to answer that question. He's
10 guaranteed these rights under the United States and Texas
11 Constitutions. In light of the fact that there are
12 investigations being conducted by the state and federal
13 government he will not be answering.

14 MS. MALONIS: Okay. To Counsel, are you
15 going to allow him to answer any questions?

16 MR. SCHAFFER: If you ask a question that
17 I don't feel he needs to raise the Fifth Amendment
18 objection to then I may.

19 MS. MALONIS: Okay.

20 Q. (By Ms. Malonis) So you cannot -- you cannot
21 answer whether you have been in the media and spoken
22 about an El Dorado investigation?

23 MR. SCHAFFER: My client will not be
24 answering that question based on the advice of counsel in
25 recognition of his rights under the state and federal

1 constitution. As I have stated before, since there are
2 ongoing investigations in the state and federal
3 government he will not be answering.

4 Q. (By Ms. Malonis) Okay. Are you following the
5 advice of your counsel and refusing to answer?

6 A. Yes, ma'am, I'll be following the advice of my
7 legal counsel.

8 Q. Thank you.

9 I'm going to hand you what has been marked as
10 Exhibit 4 and ask if you can identify that.

11 MR. SCHAFFER: Based upon the advice of
12 counsel my client will not be answering that question and
13 will invoke his right to remain silent as guaranteed by
14 the state and federal constitutions. This is based on
15 the fact that there are pending criminal investigations
16 by both the state and federal government.

17 Q. (By Ms. Malonis) And are you following the
18 advice of counsel and not -- and refusing to answer that
19 question?

20 A. Yes, ma'am.

21 Q. Okay. I'm turning to the last page of the
22 document that I just showed you and I'm going to ask if
23 that is your signature.

24 MR. SCHAFFER: Upon the advice of counsel
25 my client will not be answering that question. These

1 rights are guaranteed -- his right to remain silent is
2 guaranteed to him under the state and federal
3 constitution, and he is invoking his rights since there
4 are state and federal investigations ongoing at this
5 time.

6 MS. MALONIS: Okay.

7 Q. (By Ms. Malonis) Are you refusing to answer the
8 question on the advice of counsel?

9 A. Yes, ma'am.

10 Q. Okay. Based on the document that I just showed
11 you I'll ask you, do you believe that the YFZ raid was
12 never justified?

13 MR. SCHAFFER: Based upon the advice of
14 counsel -- based upon the advice of counsel my client
15 will not be answering that question. He is guaranteed
16 the right to remain silent under the Fifth Amendment of
17 the United States Constitution as well as the Texas
18 Constitution. Since there are ongoing criminal
19 investigations in the state and federal government he
20 will not be answering.

21 In addition, that question calls for a
22 legal conclusion that he is not qualified to give.

23 Q. (By Ms. Malonis) Are you refusing to answer
24 based on the advice of counsel?

25 A. Yes, ma'am.

1 Q. Okay. Was the FLDS community self sustaining
2 prior to the raid?

3 MR. SCHAFFER: Upon advice of counsel my
4 client will refuse to answer and invoke his right to
5 remain silent under the Fifth Amendment of the United
6 States Constitution as well as the Texas Constitution.
7 This is based upon ongoing criminal investigations by
8 both state and federal government.

9 Q. (By Ms. Malonis) Are you refusing to answer
10 based on the advice of counsel?

11 A. Yes. I'll maintain advice of counsel.

12 Q. Thank you.

13 Have the property taxes been paid on the YFZ
14 Ranch property?

15 MR. SCHAFFER: My client will not be
16 answering that question based on the advice of counsel.
17 He is refusing to answer based upon the rights guaranteed
18 under the Fifth Amendment of the U.S. Constitution as
19 well as the Texas Constitution, and he is basing this
20 upon the ongoing criminal investigations by the state and
21 federal government.

22 Q. (By Ms. Malonis) Are you refusing to answer
23 based on the advice of counsel?

24 A. Yes, ma'am.

25 Q. Thank you.

1 What is your address, your home address?

2 MR. SCHAFFER: My client wants to confer
3 about whether or not the privilege should be invoked.

4 MS. MALONIS: Okay.

5 (Discussion off the record.)

6 A. 525 Westfield Avenue, Hildale, Utah.

7 Q. (By Ms. Malonis) Do you maintain any other
8 residences?

9 MR. SCHAFFER: Upon advice of counsel my
10 client will refuse to answer and invoke his right under
11 the Fifth Amendment of the United States Constitution as
12 well as the Texas Constitution. This is based upon
13 ongoing criminal investigations by both the state and
14 federal government.

15 MS. MALONIS: Okay.

16 Q. (By Ms. Malonis) Are you refusing to answer
17 based on the advice of counsel?

18 A. Yes, ma'am.

19 Q. Do you have a residence on the YFZ Ranch?

20 MR. SCHAFFER: Upon advice of counsel my
21 client will refuse to answer that question and invokes
22 his right to remain silent as guaranteed by the Fifth
23 Amendment of the United States Constitution as well as
24 the Texas Constitution. He is doing so based upon the
25 ongoing criminal investigations that are being conducted

1 by the federal and state government.

2 Q. (By Ms. Malonis) Are you refusing to answer
3 based on advice of counsel?

4 A. Yes, ma'am.

5 Q. I'm going to hand you what's been marked as
6 Exhibit 3 and ask if you have previously seen that
7 document. I would like for the witness to actually look
8 through the document.

9 MR. SCHAFFER: Upon advice of counsel
10 Mr. Jessop will not answer that question and will invoke
11 his right to remain silent under the Fifth Amendment of
12 the United States Constitution as well as the Texas
13 Constitution. He is invoking these rights because
14 there's ongoing federal and state criminal
15 investigations.

16 MS. MALONIS: Okay. Are you refusing to
17 answer based on the advice of counsel?

18 A. Yes, ma'am.

19 Q. (By Ms. Malonis) Okay. I'm going to tender the
20 document back to you and ask you if you can -- looking
21 through that if you can verify or deny the truth of
22 anything contained in that report?

23 MR. SCHAFFER: Upon advice of counsel
24 Mr. Jessop will refuse to answer and invoke his Fifth
25 Amendment right to remain silent under the Fifth

1 Amendment of the United States Constitution as well as
2 the Texas Constitution. This is based upon criminal
3 investigations that are ongoing by the state and federal
4 government.

5 In addition, he would not have knowledge
6 of the facts contained in that report to know if they are
7 true or not.

8 Q. (By Ms. Malonis) Okay. So is it -- is it your
9 testimony that you don't have knowledge of the -- you
10 cannot verify this, or are you asserting a privilege?

11 MR. SCHAFFER: He's asserting a privilege,
12 as I just told you.

13 MS. MALONIS: Okay.

14 Q. (By Ms. Malonis) Okay. Do you have knowledge
15 of any of the facts in here as your counsel represented?

16 A. I'll follow the advice of legal counsel.

17 Q. Well, I'm confused about Counsel's advice.

18 Would you look through the document and tell me
19 whether or not you have knowledge of anything in that --
20 contained in that report?

21 MR. SCHAFFER: Upon advice of counsel
22 Mr. Jessop will refuse to answer and invoke his right to
23 remain silent under the Fifth Amendment of the United
24 States Constitution as the well as the Texas
25 Constitution. This is based upon the ongoing criminal

1 investigations by the state and federal government.

2 MS. MALONIS: Do you want to withdraw your
3 comment that he would have no knowledge of what's in that
4 report?

5 MR. SCHAFFER: I think you need to rely --
6 I'll withdraw it.

7 MS. MALONIS: Okay. Thank you.

8 MR. SCHAFFER: I think you need to rely on
9 the people who wrote it. Ask them if it's valid.

10 Q. (By Ms. Malonis) Are you refusing to answer
11 based on the advice of counsel?

12 A. Yes, ma'am.

13 Q. Okay. Do you know Teresa Jeffs?

14 MR. SCHAFFER: On advice of counsel
15 Mr. Jessop will refuse to answer and invoke his right to
16 remain silent under the Fifth Amendment as well as the
17 Texas Constitution. This is based upon ongoing criminal
18 investigations being conducted by the state and federal
19 government.

20 Q. (By Ms. Malonis) Are you refusing to answer
21 based on advice of counsel?

22 A. Yes, ma'am.

23 Q. Okay. I'm turning to page -- to the fourth
24 page back in the document in Exhibit No. 3 that I just
25 showed you. It's a picture of two people.

1 Can you identify either of those people?

2 MR. SCHAFFER: Upon advice of counsel
3 Mr. Jessop will refuse to answer and invoke his right to
4 remain silent under the Fifth Amendment of the United
5 States Constitution as well as the Texas Constitution.
6 This is based upon ongoing criminal investigations by
7 both the state and federal government.

8 Q. (By Ms. Malonis) Okay. Are you refusing to
9 answer based on the advice of counsel?

10 A. Yes, ma'am.

11 Q. Do you know a person by the name of Warren
12 Jeffs?

13 MR. SCHAFFER: On advice of counsel
14 Mr. Jessop will refuse to answer and invoke his right to
15 remain silent under the Fifth Amendment of the United
16 States Constitution as well as the Texas Constitution.
17 This is based upon criminal investigations being
18 conducted by both state and federal government.

19 Q. (By Ms. Malonis) Are you refusing to answer
20 based on your counsel's instruction?

21 A. Yes, ma'am.

22 Q. Okay. What is your association with a company
23 by the name of R&W Excavating, Inc.?

24 MR. SCHAFFER: On advice of counsel
25 Mr. Jessop will refuse to answer and invoke his right to

1 remain silent under the Fifth Amendment of the United
2 States Constitution as well as the Texas Constitution.
3 This is based upon ongoing criminal investigations by
4 both the state and federal government.

5 Q. (By Ms. Malonis) What's your date of birth?

6 A. October 12th of 1968.

7 Q. Okay. I'm going to hand you Exhibit 7 and ask
8 if you can -- I'll ask you first if you recognize that,
9 if you've ever seen it.

10 MR. SCHAFFER: Upon advice of counsel
11 Mr. Jessop will not be answering that question and
12 invokes his right to remain silent under the Fifth
13 Amendment of the United States Constitution as well as
14 the Texas Constitution. He is invoking these rights
15 because of ongoing criminal investigations within the
16 state and federal government.

17 Q. (By Ms. Malonis) Okay. Are you refusing to
18 answer based on your counsel's instruction?

19 A. Yes, ma'am.

20 Q. Okay. Do you own property in the State of
21 Utah?

22 MR. SCHAFFER: Upon advice of counsel
23 Mr. Jessop will not be answering that question and will
24 refuse to answer based upon the guarantees provided for
25 under the Fifth Amendment of the United States

1 Constitution as well as the Texas Constitution. He is
2 doing so because of ongoing criminal investigations by
3 the federal and state government.

4 Q. (By Ms. Malonis) Mr. Jessop, have you been
5 informed by any law enforcement or agent of law
6 enforcement that you're under investigation?

7 MR. SCHAFFER: Mr. Jessop will not be
8 answering that question based upon his rights guaranteed
9 under the Fifth Amendment of the United States
10 Constitution as well as the Texas Constitution. This is
11 based upon the fact that there are ongoing criminal
12 investigations being conducted by both the state and
13 federal government.

14 Q. (By Ms. Malonis) Are you refusing to answer
15 based on your counsel's instruction?

16 A. Yes, ma'am.

17 Q. Okay. Are you involved in negotiations
18 regarding litigation of the United Effort Plan?

19 MR. SCHAFFER: Mr. Jessop will not answer
20 that question based upon his rights guaranteed under
21 Fifth Amendment of the United States Constitution as well
22 as the Texas Constitution. This is based upon criminal
23 investigations being conducted by the state and federal
24 government.

25 Q. (By Ms. Malonis) Are you refusing to answer

1 based on your counsel's instruction?

2 A. Yes, ma'am.

3 Q. Okay. Are you familiar with an entity known as
4 the United Effort Plan?

5 MR. SCHAFFER: Upon advice of counsel
6 Mr. Jessop will not be answering that question and will
7 invoke his right to remain silent under the Fifth
8 Amendment of the United States as well as the Texas
9 Constitution. This is based upon the fact that there are
10 criminal investigations by the federal and state
11 government that are ongoing at this time.

12 Q. (By Ms. Malonis) Are you refusing to answer
13 based on your counsel's instruction?

14 A. Yes, ma'am.

15 Q. Okay. Have you held yourself out to be the
16 spokesman for the women and children of the YFZ Ranch?

17 MR. SCHAFFER: Upon advice of counsel
18 Mr. Jessop will not be answering that question and will
19 invoke his right to remain silent as guaranteed by the
20 Fifth Amendment of the United States Constitution as well
21 as the Texas Constitution. This is based upon ongoing
22 criminal investigations by the federal and state
23 government.

24 Q. (By Ms. Malonis) Are you refusing to answer
25 based on the instruction of your counsel?

1 A. Yes, ma'am.

2 Q. When was the last time you communicated with
3 Warren Jeffs?

4 MR. SCHAFFER: Upon advice of counsel
5 Mr. Jessop will refuse to answer that question and invoke
6 his right to remain silent under the Fifth Amendment of
7 the United States Constitution as well as the Texas
8 Constitution. He's basing the invocation of these rights
9 upon the fact that there are currently federal and state
10 criminal investigations.

11 Q. (By Ms. Malonis) Are you refusing to answer
12 based on the instruction of your counsel?

13 A. Yes, ma'am.

14 Q. When you identify yourself as spokesman -- I'm
15 sorry. Scratch that.

16 In your dealings with litigation involving the
17 UEP who do you represent?

18 MR. SCHAFFER: Upon advice of counsel
19 Mr. Jessop will refuse to answer and invoke his right
20 remain silent under the Fifth Amendment of the United
21 States Constitution as well as the Texas Constitution.
22 This is based upon the fact that there are ongoing
23 criminal investigations being conducted by both the state
24 and federal government.

25 Q. (By Ms. Malonis) Are you refusing to answer

1 based on the instruction of counsel?

2 A. Yes, ma'am.

3 Q. Who gave you the authority to represent anyone
4 in UEP litigation?

5 MR. SCHAFFER: Upon advice of counsel
6 Mr. Jessop will refuse to answer that question and invoke
7 his right to remain silent under the Fifth Amendment of
8 the United States Constitution as well as the Texas
9 Constitution. This is based upon ongoing criminal
10 investigations which are being conducted by both the
11 state and federal government.

12 Q. (By Ms. Malonis) Are you refusing to answer
13 based on instruction of counsel?

14 A. Yes, ma'am.

15 Q. Okay. Are you asking for affirmative relief in
16 litigation concerning the UEP?

17 MR. SCHAFFER: Upon advice of counsel
18 Mr. Jessop will refuse to answer that question and invoke
19 his right to remain silent under the Fifth Amendment of
20 the United States Constitution as well as the Texas
21 Constitution. This is based upon ongoing criminal
22 investigations by the federal and state government.

23 Q. (By Ms. Malonis) Are you refusing to answer
24 based on the instruction of counsel?

25 A. Yes, ma'am.

1 Q. Are you a member of the beneficiary class of
2 the UEP trust?

3 MR. SCHAFFER: Upon on advice of counsel
4 Mr. Jessop will refuse to answer and invoke his right to
5 remain silent under Fifth Amendment of the United States
6 Constitution as well as the Texas Constitution. This is
7 based upon ongoing criminal investigations by federal and
8 state authorities.

9 Q. (By Ms. Malonis) Are you refusing to answer
10 based on the instruction of counsel?

11 A. Yes, ma'am.

12 Q. Okay. Do you know how to identify who is a
13 member of the beneficiary class of the UEP trust?

14 MR. SCHAFFER: Upon advice of counsel
15 Mr. Jessop will refuse to answer and invokes his right to
16 remain silent under the Fifth Amendment of the United
17 States Constitution as well as the Texas Constitution.
18 He is doing so because of ongoing criminal investigations
19 by both federal and state government.

20 Q. (By Ms. Malonis) Are you refusing to answer
21 based on the instruction of counsel?

22 A. Yes, ma'am.

23 Q. Okay. Has any -- has any particular person
24 given you authority to represent them in litigation
25 involving the UEP trust?

1 MR. SCHAFFER: Upon advice of counsel
2 Mr. Jessop will refuse to answer and invoke his right to
3 remain silent under the Fifth Amendment of the United
4 States Constitution as well as the Texas Constitution.
5 This is based upon criminal investigations by federal and
6 state government.

7 Q. (By Ms. Malonis) Are you refusing to answer
8 based on instruction of counsel?

9 A. Yes, ma'am.

10 Q. Has Teresa Jeffs authorized you to represent
11 her in UEP litigation?

12 MR. SCHAFFER: Upon advice of counsel
13 Mr. Jessop will refuse to answer and invoke his right to
14 remain silent under the Fifth Amendment of the United
15 States Constitution as well as the Texas Constitution.
16 This is based upon ongoing criminal investigations by the
17 state and federal government.

18 Q. (By Ms. Malonis) Are you refusing to answer
19 based on instruction of counsel?

20 A. Yes, ma'am.

21 Q. Okay. Do you recognize the woman sitting in
22 the blue dress at this table?

23 MR. SCHAFFER: I will confer with my
24 client regarding whether he should exercise privilege in
25 regard to that question.

1 (Discussion off the record.)

2 Q. (By Ms. Malonis) Can you answer the question?

3 A. Would you please restate the question?

4 MS. MALONIS: If the court reporter could
5 read back the question, please.

6 (The record was read as requested)

7 A. Yes, I do.

8 Q. (By Ms. Malonis) Okay. And how do you
9 recognize her?

10 A. By the blue dress.

11 Q. How is it that you recognize her?

12 Where do you know her from, or is it your
13 testimony that you recognize the blue dress?

14 A. What was your question, ma'am?

15 Q. How do you recognize the woman in the blue
16 dress?

17 A. The same way I would recognize anyone.

18 MS. MALONIS: Objection; nonresponsive.

19 A. How do I recognize you? I mean --

20 Q. (By Ms. Malonis) Mr. Jessop --

21 A. -- the same way I would know her.

22 MS. MALONIS: Objection; nonresponsive.

23 Q. (By Ms. Malonis) Can you answer the question,
24 please?

25 A. I recognize the individual.

1 MS. MALONIS: Objection; nonresponsive.

2 Q. (By Ms. Malonis) Are you refusing to answer the
3 question?

4 A. I answered your question.

5 Q. Okay. How do you know the woman in the blue
6 dress?

7 A. The question is vague. I don't know what --
8 what individual you are looking -- I recognize you in a
9 black dress. I recognize --

10 MS. MALONIS: Objection; nonresponsive.

11 Q. (By Ms. Malonis) Did you not understand my
12 question? I can clarify it if you need me to.

13 A. Great.

14 Q. The woman in the blue dress -- there is only
15 one woman in a blue dress at this table -- how do you
16 know her?

17 A. Are you asking if I know her name, or what?

18 MS. MALONIS: Objection; nonresponsive.

19 Q. (By Ms. Malonis) Can you answer the question,
20 please?

21 A. I asked for clarification.

22 Q. Mr. Jessop, how do you know the woman in the --
23 in the blue dress? There is no way to clarify that
24 question. It's clear.

25 A. Are you asking if I know her name?

1 MS. MALONIS: Objection; nonresponsive.

2 Q. (By Ms. Malonis) Are you refusing to answer the
3 question?

4 A. No.

5 Q. Then --

6 A. I've answered your question. You won't give me
7 clarification.

8 MS. MALONIS: Objection; nonresponsive.

9 Q. (By Ms. Malonis) Are you going to answer the
10 question?

11 A. The vagueness of your question is un -- unable
12 to be -- the same way I would recognize you.

13 How do I recognize you?

14 MS. MALONIS: Objection nonresponsive.

15 Q. (By Ms. Malonis) Mr. Jessop, do you have a
16 problem understanding con -- conversant English?

17 A. Well, maybe you could give me some
18 clarification.

19 How do you know Mr. Schaffer?

20 MS. MALONIS: Objection; nonresponsive.

21 Q. (By Ms. Malonis) Mr. Jessop, are you impaired
22 mentally in any way today?

23 MR. SCHAFFER: I'm going to object to
24 harassment of the witness.

25 Q. (By Ms. Malonis) Can you answer the question?

1 I can clarify that further.

2 Have you taken any medications today?

3 A. No, I haven't taken medications.

4 Q. Okay. Is there a reason there was such a long
5 pause to answer that question?

6 A. Just because of the harassment factor from
7 yourself.

8 MS. MALONIS: Objection; nonresponsive.

9 Q. (By Ms. Malonis) Did you have trouble recalling
10 whether or not you took medication today?

11 A. Ma'am, if anybody needs meds it's you.

12 MS. MALONIS: Objection; nonresponsive.

13 Q. (By Ms. Malonis) Would you answer the question,
14 please?

15 A. I did.

16 MS. MALONIS: Could you read back the
17 question, please.

18 (The record was read as requested.)

19 Q. (By Ms. Malonis) Okay. Have you had any other
20 mind-altering substances either ingested or imbibed in
21 any -- that would affect your cognitive abilities?

22 A. This is harassment.

23 MR. SCHAFFER: Answer the question.

24 A. No. I'm not on any meds.

25 Q. (By Ms. Malonis) Okay. Do you have a problem

1 with your memory?

2 A. Just harassment.

3 MR. SCHAFFER: Just answer the question.

4 A. No, I don't.

5 Q. (By Ms. Malonis) Okay. I'm going to ask you
6 again, how do you know the woman in the blue dress?

7 A. Are you asking her name? What are you wanting
8 to know about her? I recognize her because of the
9 person, the same way I would recognize you.

10 MS. MALONIS: Objection; nonresponsive.

11 Q. (By Ms. Malonis) Okay. I'm -- I'm going to --
12 I'm going to take the nonresponsiveness as a refusal to
13 answer and ask another question.

14 Did you know the woman in the blue dress
15 prior to today?

16 A. Yes, I did.

17 Q. Okay. How long have you known her?

18 A. I don't recall the -- from the time frame.

19 Q. Okay. Have you known her for longer than a
20 year?

21 A. Yes, ma'am.

22 Q. Have you known her for longer than two years?

23 A. Yes, ma'am.

24 Q. Have you known her for longer than five years?

25 A. Yes, ma'am.

1 Q. Have you known her since you were a child?

2 A. Yes, ma'am.

3 Q. Okay. And how old are you?

4 A. 40.

5 Q. Okay. And how is it that you came to know the

6 woman in the blue dress --

7 A. I don't recall --

8 Q. -- if you recall?

9 A. -- the circumstances.

10 Q. Okay. Are you -- and is -- do you know her

11 name?

12 A. I do.

13 Q. What's her name?

14 A. Annette.

15 Q. What's her last name?

16 A. Jeffs.

17 Q. Okay. Are you and Annette Jeffs associated in

18 any groups together?

19 MR. SCHAFFER: Upon advice of counsel

20 Mr. Jessop will refuse to answer that question and invoke

21 his right to remain silent under the United States

22 Constitution as well as the Texas Constitution. This is

23 based upon the fact there are ongoing criminal

24 investigations by federal and state government.

25 Q. (By Ms. Malonis) Okay. Are you refusing to

1 answer based on the instruction of counsel?

2 A. Yes, ma'am.

3 Q. Okay. Prior to today when was the last time
4 you spoke with Ms. Annette Jeffs?

5 MR. SCHAFFER: Upon advice of counsel
6 Mr. Jessop will refuse to answer that question and invoke
7 his right to remain silent under the Fifth Amendment of
8 the Texas -- of the United States Constitution as well as
9 the Texas Constitution. This is based upon the fact
10 there are ongoing criminal investigations being conducted
11 by both the state and federal government.

12 Q. (By Ms. Malonis) Okay. Are you refusing to
13 answer based on instruction of counsel?

14 A. Yes, ma'am.

15 Q. Okay. Do you know Ms. Annette Jeff's children?

16 MR. SCHAFFER: Upon advice of counsel
17 Mr. Jessop will refuse to answer that question and invoke
18 his right to remain silent under the Fifth Amendment of
19 the United States Constitution as well as the Texas
20 Constitution. This is based upon ongoing criminal
21 investigations that are being conducted by both the state
22 and federal government.

23 Q. (By Ms. Malonis) Are you refusing to answer
24 based on instruction of counsel?

25 A. Yes, ma'am.

1 Q. Okay. Do you know Teresa Jeffs?

2 MR. SCHAFFER: Upon advice of counsel
3 Mr. Jessop will refuse to answer that question and invoke
4 his right to remain silent under the Fifth Amendment of
5 the United States Constitution as well as the Texas
6 Constitution. He is doing so because of the ongoing
7 state and federal criminal investigations.

8 Q. (By Ms. Malonis) Are you refusing to answer
9 based on your counsel's instruction?

10 A. Yes, ma'am.

11 Q. Did you file an application for a restraining
12 order against an individual named Sam Brower?

13 MR. SCHAFFER: Upon advice of counsel
14 Mr. Jessop will refuse to answer that question and invoke
15 his right to remain silent under the Fifth Amendment of
16 the United States Constitution as well as the Texas
17 Constitution. This is based upon ongoing criminal
18 investigations by both the federal and state government.

19 Q. (By Ms. Malonis) Are you refusing to answer
20 based on the instruction of counsel?

21 A. Yes, ma'am.

22 Q. Okay. I'm going to hand you what's been marked
23 as Exhibit 12 and ask if you recognize that. I'm sorry.
24 This is the other part of Exhibit 12 (indicating).

25 MR. SCHAFFER: What is the question?

1 MS. MALONIS: Do you recognize that?

2 And if the record can reflect a lengthy
3 conference between the witness and counsel.

4 A. It appears to be a photocopy of some work done
5 by my attorney, Rob Parker.

6 Q. (By Ms. Malonis) And turning to a few pages
7 back where there is a page that says verification on the
8 top do you -- is that your signature where it says
9 William R. Jessop?

10 A. No. I haven't signed that paper.

11 Q. Is that -- did you sign an original of this
12 (indicating)?

13 A. I believe so.

14 Q. Okay. Does this appear to be an accurate
15 photocopy of what was the original?

16 A. Without the original here I don't know.

17 Q. Okay. Can you look through that and tell me if
18 you see any alterations or --

19 A. Without the originals here I wouldn't know what
20 would have been altered or what hasn't.

21 Q. Okay. Can you look through it and tell me if
22 you -- if you note any?

23 A. Without having the original here I wouldn't be
24 able to verify it.

25 Q. Would you look through the document and tell me

1 if there is anything in the document that is not true?

2 A. You just want us to take this a while and read
3 it or what do you --

4 MS. MALONIS: Yeah, why don't we do that.
5 Let's -- let's go off the record and take a break while
6 Mr. Jessop reads this and reconvene in about 15 minutes.

7 VIDEO TECHNICIAN: The -- the time is
8 10:27 a.m. and we're off the record.

9 (Recess from 10:27 to 10:52)

10 VIDEO TECHNICIAN: The time is 10:52 a.m.
11 and we are back on the record.

12 MS. MALONIS: Okay. And I believe there
13 was a question pending if the court reporter could read
14 that back, please.

15 (The record was read as requested)

16 MR. SCHAFFER: On advice of counsel
17 Mr. Jessop will refuse to answer the question and invoke
18 his right to remain silent as guaranteed by the Fifth
19 Amendment of the United States Constitution as well as
20 the Texas Constitution. He will do so based on the fact
21 there are ongoing criminal investigations being conducted
22 the state and federal government.

23 Q. (By Ms. Malonis) Okay. Are you refusing to
24 answer based on the instruction of counsel?

25 A. Yes, ma'am.

1 Q. Okay. And you previously identified your
2 signature on the verification page.

3 Do you have an understanding of what
4 verification means?

5 A. I believe so.

6 Q. What is your understanding in the context of
7 signing the verification on this document you just
8 identified? If you would like to review it you may.

9 Okay. Can you answer the question?

10 MR. SCHAFFER: You can answer.

11 A. Basically that that was a complaint that was
12 complained against Sam Brower.

13 Q. (By Ms. Malonis) Okay. Did you read the
14 verification page that I've just handed you? I'm asking
15 you about the verification.

16 Do you have an understanding of what the
17 verification means?

18 A. Yes.

19 Q. Okay. And what does that mean?

20 A. It means that I verified it.

21 Q. Okay. So is it -- do you understand that you
22 are swearing that the contents are true, or is that your
23 understanding?

24 A. There was a document prepared for me by my
25 attorney to -- to sign and the facts of the case is

1 things that he's worked on and -- is that what you asked?

2 Q. I'm asking, when you signed this verification
3 was it -- did you understand that you were signing a
4 sworn statement that the contents of the pleading are
5 true?

6 A. I believe so.

7 Q. Okay. And are you now not able to -- to verify
8 as we sit here today that the contents are true?

9 MR. SCHAFFER: Upon the advice of counsel
10 Mr. Jessop will refuse to answer that question and invoke
11 his right to remain silent under the Fifth Amendment of
12 the United States Constitution as well as the Texas
13 Constitution. He is basing this upon the fact that there
14 are state and federal criminal investigations ongoing at
15 this time.

16 Q. (By Ms. Malonis) Are you refusing to answer
17 based on your counsel's instruction?

18 A. We are -- we're following legal advice, yes.

19 Q. Okay. Who is question we?

20 A. Myself. Excuse me.

21 Q. Okay.

22 A. Sorry.

23 Q. Okay. This -- this complaint that you just
24 identified, or this pleading, what's the status of this
25 in the courts?

1 A. I believe it's ongoing.

2 Q. Okay. Have there been any hearings?

3 A. Yes, there's been one.

4 Q. Okay. What was the outcome of that hearing?

5 A. That they scheduled another one.

6 Q. Okay. Were there any other results of that
7 hearing?

8 A. In what form?

9 Q. You had -- is it true that you had applied for
10 a restraint -- a temporary restraining order?

11 A. That is correct.

12 Q. And did the hearing -- the hearing that was
13 held, was that to determine whether to extend the
14 temporary restraining order into a temporary injunction?

15 A. I'm not sure how it -- the structure of it, but
16 I know the conclusion of it was is Mr. Brower agreed to
17 not violate the terms of that restraining order and it
18 was scheduled to go forward with the trial.

19 Q. Okay. And that's the conclusion of the hearing
20 that you already had?

21 A. Is my understanding.

22 Q. Okay. And did the -- did the court deny your
23 request for a temporary injunction?

24 A. I would need to consult with Mr. Parker on the
25 exacts of what the legal conclusion of what that

1 entailed.

2 Q. Okay. As you sit here today do you have an
3 opinion about whether or not Sam Brower is restrained
4 from any of the acts that you requested that he be
5 restrained from?

6 A. It's my understanding that he has made an
7 agreement with this court and with the attorneys that he
8 wouldn't harass or bother my family.

9 MS. MALONIS: Objection; nonresponsive.
10 Can you repeat the question?

11 (The record was read as requested)

12 A. So I'm a little confused to why I didn't
13 respond to it. I responded as best I could.

14 Q. (By Ms. Malonis) Okay. And maybe -- maybe I
15 didn't understand your answer.

16 You had asked for a restraining order,
17 correct?

18 A. Yes.

19 Q. Okay. And at the conclusion of the hearing was
20 the restraining -- was your request for a restraining
21 order granted or denied?

22 A. I would need to talk with Mr. Parker, but it
23 was my understanding that Mr. Brower agreed to the court
24 and to counsel that he would not be photographing or
25 bothering my family.

1 Q. Okay. Do you -- do you not recall the court's
2 ruling one way or the other?

3 A. I recall that the --

4 Q. Irrespective of what Mr Brower said or did do
5 you recall what the court's ruling was?

6 A. The court's ruling that I -- as I recall it was
7 is it was scheduled for more evidence and a continuation.

8 Q. Okay. And in the interim is there a
9 restraining order in place?

10 A. There was an internal agreement that he
11 wouldn't bother my family.

12 MS. MALONIS: Objection; nonresponsive.

13 Q. (By Ms. Malonis) I'm --

14 A. Well --

15 Q. I have to make the objections.

16 I'm asking -- I understand your answer but what
17 I'm asking you, is there a restraining order in place
18 until you have your next hearing, or do you know?

19 A. It was my understanding that there was an
20 agreement that Mr. Brower made to the court and to the
21 lawyers that there would not be a continuation of his
22 conduct.

23 Q. Okay. Do you know what a restraining order is?

24 A. I believe so.

25 Q. Okay. Can you express what -- your

1 understanding of -- of a restraining order?

2 A. So you are asking for a legal con -- or
3 legal --

4 Q. I'm asking --

5 A. -- the legal definition? I mean, I would be
6 glad to do that.

7 Q. No. I'm asking your understanding, since you
8 just said you have an understanding.

9 A. Well, my understanding was is that a
10 restraining order would protect Mr. Brower from bothering
11 my family in my absence.

12 Q. Okay.

13 A. It's a court order that he can't do.

14 Q. Okay. So it is your understanding that there
15 is a court order that he not do certain things?

16 A. That's what a restraining order was. I thought
17 that was your question, was what is a restraining
18 order --

19 Q. Okay.

20 A. -- in that context.

21 Q. That was my question.

22 Okay. Is there a restraining order in place?

23 A. I don't believe there is an actual signed one.
24 I think there was an agreed upon -- he agreed that he was
25 a licensed PI or something and that he wouldn't violate

1 certain ethics, and I think that was the conclusion
2 pending further investigation.

3 Q. Okay. Isn't it true that your request for a
4 temporary injunction or restraining order was denied at
5 that hearing?

6 A. Without consulting with Mr. Parker I don't know
7 what the exact legal conclusion of that hearing was.

8 Q. Okay. Did you give an oral deposition on
9 September 22nd of '08?

10 A. In regards to what?

11 Q. In regards to anything.

12 Have you given -- did you give --

13 A. I don't recall where I was September, no.

14 Q. Okay. Do you recall whether you gave a
15 deposition in September?

16 A. In regards to a particular case --

17 Q. Here.

18 A. -- or something?

19 Q. Let me hand you Exhibit 5 and see if that
20 refreshes your recollection and if you recognize that as
21 being what appears to be a transcript of your deposition
22 from September 22nd, 2008.

23 A. It appears to be, yes.

24 Q. Okay. May I have that back?

25 A. Okay.

1 Q. And as necessary, you know, I'll allow you and
2 counsel to review it as well.

3 Do you recall -- did you claim any Fifth
4 Amendment privileges during the course of this deposition
5 in September --

6 A. I don't recall.

7 Q. -- just off the top of your head?

8 Okay. You don't recall either way?

9 A. I --

10 Q. Okay.

11 A. I don't recall.

12 Q. All right.

13 A. We had attorneys at that one as well, so I'm
14 not sure what the advice of that was.

15 Q. Okay. Do you recall if you were asked
16 questions about the UEP trust in this deposition?

17 A. There could have been questions on that, yes.

18 Q. Does that generally sound like one of the
19 topics that you-all discussed?

20 Do you have any recollection of that?

21 A. There was a lot of things discussed. That
22 could very likely --

23 Q. Okay.

24 A. -- be.

25 Q. Do you want to look through this for -- for a

1 couple of minutes to refresh your memory about your
2 deposition?

3 MS. MALONIS: If you-all need some time to
4 look through that we can go off the record.

5 MR. SCHAFFER: Yeah, we should. This is a
6 pretty length deposition.

7 MS. MALONIS: Okay. It's lengthy. All
8 right. Let's take -- it's 11:00. Why don't we take
9 30 minutes and if you need -- not that long?

10 MR. SCHAFFER: Ten minutes.

11 MS. MALONIS: Okay. All right. Say
12 15 minutes, okay?

13 VIDEO TECHNICIAN: The time is 11:03 a.m.
14 and we are off the record.

15 (Recess from 11:03 to 11:17)

16 VIDEO TECHNICIAN: The time is 11:17 a.m.
17 and we are back on the record.

18 Q. (By Ms. Malonis) Okay. While we are having
19 that exhibit copied did you and your counsel have a
20 chance to review it generally?

21 A. Yes.

22 Q. Okay. And I believe the question was, in your
23 deposition in September of '08 did you -- did you assert
24 a Fifth Amendment privilege?

25 A. I don't know what all the privileges were or

1 are, but I know there was privileges involved.

2 Q. Okay. In reviewing it did you see any
3 assertions of Fifth Amendment privilege? And if you need
4 to look at it again when it comes -- when it comes back
5 that's -- we can --

6 A. I think it's 3 or 400 pages and I think the
7 document speaks for itself. I don't -- I don't know what
8 the --

9 Q. Okay.

10 A. I don't know what privileges were invoked, but
11 I know that there was some privileges invoked and I think
12 the document speaks for itself.

13 Q. Okay. And having reviewed it, is it true that
14 you did answer most of the questions?

15 A. It appears to be answered all that we could on
16 advice of counsel, yes.

17 Q. Okay. And having reviewed it generally what
18 were the subject matters that were -- that were discussed
19 in that deposition?

20 MR. SCHAFFER: I'm going to object to that
21 in that these are harassing, abusive questions that have
22 nothing to do with the subject matter of this lawsuit.

23 And furthermore, my client will refuse to
24 answer based upon his rights guaranteed under the Fifth
25 Amendment of the United States Constitution as well as

1 the Texas Constitution due to the fact that there are
2 ongoing criminal investigations in both state and federal
3 court.

4 Q. (By Ms. Malonis) Okay. And are you going to
5 refuse to answer based on your counsel's instruction?

6 A. That's what we've got these lawyers for.

7 Q. Okay. Is that a yes?

8 A. That is a yes.

9 Q. Thank you.

10 What was that dep -- was that deposition taken
11 in connection with a lawsuit or do you -- what was the
12 occasion?

13 MR. SCHAFFER: I will object on the
14 grounds that these are harassing and abusive questions
15 that have no bearing on the subject matter of this
16 litigation.

17 And in addition, my client will not answer
18 these questions because to do so would be a violation of
19 his Fifth Amendment rights and his rights guaranteed to
20 remain silent under the Texas Constitution due to the
21 fact that there is ongoing criminal investigations being
22 conducted by both the state and federal government.

23 Q. (By Ms. Malonis) Are you refusing to answer the
24 question based on the instruction of counsel?

25 A. Yes, ma'am.

1 Q. Okay. In that deposition were you being
2 deposed as an individual or in a representative capacity?

3 MR. SCHAFFER: I will object on the
4 grounds again that this is harassing. It is also abusive
5 for my client to be questioned about litigation that has
6 no bearing on this case.

7 Also, that question calls for a legal
8 conclusion he is not qualified to give, and in addition,
9 he will invoke his right to remain silent under the Fifth
10 Amendment of the United States Constitution and the Texas
11 Constitution based on the fact there is criminal
12 investigation being conducted by both the state
13 government and federal government.

14 MS. MALONIS: Excuse me.

15 Q. (By Ms. Malonis) Okay. Are you refusing to
16 answer based on the instruction of counsel?

17 A. Yes, ma'am.

18 Q. Have you ever given a deposition in a
19 representative capacity -- well, strike that.

20 Do you understand what -- what it means to be
21 in a representative capacity?

22 A. Not exactly. I mean --

23 Q. Okay.

24 A. -- if you can clarify it.

25 Q. Okay. Do you understand that, for instance, a

1 president of a corporation who's having his deposition
2 taken as the president of the corporation is there on
3 behalf of the corporation and not individually
4 necessarily?

5 Do you understand that?

6 A. I think so.

7 Q. So he's a representative of the corporation --

8 A. Uh-huh.

9 Q. -- or a -- or a -- a guardian of a child would
10 be a representative of the child.

11 Do you understand that?

12 A. I think so.

13 Q. Okay. So with that understanding have you ever
14 given a deposition in a representative capacity?

15 MR. SCHAFFER: Go ahead.

16 A. Not that I'm aware of --

17 Q. (By Ms. Malonis) Okay.

18 A. -- but I don't know.

19 Q. Okay.

20 A. I haven't --

21 Q. All right. Thank you.

22 MS. MALONIS: Are we still waiting on
23 copies?

24 MR. DAVIS: Uh-huh.

25 MS. MALONIS: Okay. All right.

1 Q. (By Ms. Malonis) Do you -- are you involved --
2 are you involved in any of the custody litigation or
3 have -- strike that.

4 Have you been involved or are you involved in
5 an ongoing basis in any of the custody litigation arising
6 out of the investigation of activities on the YFZ Ranch?

7 MR. SCHAFFER: On the advice of counsel
8 Mr. Jessop will refuse to answer this question and invoke
9 his right to remain silent as guaranteed by the Fifth
10 Amendment of the United States Constitution as well as
11 the Texas Constitution. He is doing so because there are
12 ongoing investigations being conducted by the state and
13 federal government.

14 Q. (By Ms. Malonis) Are you refusing to answer
15 based on -- on instruction of counsel?

16 A. Yes, ma'am.

17 Q. Okay. Have you participated in any
18 negotiations among parties in any of the custody suits
19 arising out of activities at the YFZ Ranch?

20 MR. SCHAFFER: On advice of counsel
21 Mr. Jessop will refuse to answer this question and invoke
22 his right to remain silent as guaranteed by the Fifth
23 Amendment of the United States Constitution as well as
24 the Texas Constitution. He is doing so because there are
25 ongoing criminal investigations being conducted by the

1 state and federal government.

2 MS. MONTFORD: And on behalf of Annette
3 Jeffs I object to the form of the question.

4 MS. MALONIS: Okay. On -- what are your
5 grounds for --

6 MS. MONTFORD: It assumes facts not in
7 evidence; it goes to attorney/client privilege; and it's
8 vague, overbroad, and too general. It's also confusing
9 and compound.

10 MS. MALONIS: That was confusing and
11 compound.

12 Can you read back the question?

13 (The record was read as requested)

14 MS. MALONIS: Okay. That was confusing
15 and compound. Let me restate that.

16 Q. (By Ms. Malonis) Have you participated in any
17 negotiations involving the custody litigation?

18 MR. SCHAFFER: On the advice of counsel
19 Mr. Jessop will refuse to answer that question and invoke
20 his right to remain silent as guaranteed by the Fifth
21 Amendment to the United States Constitution as well as
22 the Texas Constitution. He is doing so because there are
23 ongoing criminal investigations being conducted by both
24 the state and federal government.

25 MS. MONTFORD: And also object on the

1 grounds that -- to form and that it is assuming facts not
2 in evidence, and I believe it's vague.

3 MS. MALONIS: Okay.

4 Q. (By Ms. Malonis) And are you refusing to answer
5 based on the instruction of counsel?

6 A. Yes, ma'am.

7 Q. Okay. Are you familiar with a young lady by
8 the name of Teresa Steed?

9 A. I am familiar with several individuals with
10 that name.

11 Q. Okay. Are you familiar with an individual by
12 the name of Teresa Steed who is subject to custody
13 litigation in Texas?

14 MR. SCHAFFER: On advice of counsel
15 Mr. Jessop will refuse to answer and invoke his right to
16 remain silent under the Fifth Amendment to the United
17 States Constitution as well as the Texas Constitution.
18 He is doing so because there are currently criminal
19 investigations being conducted by both the state and
20 federal government.

21 Q. (By Ms. Malonis) Are you refusing to answer
22 on -- based on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Okay. Have you participated in any aspect of
25 Teresa Steed's custody case?

1 MR. SCHAFFER: On advice of counsel
2 Mr. Jessop will refuse to answer that question and invoke
3 his right to remain silent under the Fifth Amendment to
4 the United States Constitution as well as the Texas
5 Constitution. He is doing so because there are currently
6 criminal investigations being conducted by both the state
7 and federal government.

8 MS. MONTFORD: And I'll object to form.

9 MS. MALONIS: On what grounds?

10 MS. MONTFORD: On the grounds that it
11 assumes facts not in evidence.

12 MS. MALONIS: Okay.

13 Q. (By Ms. Malonis) Are you refusing to answer
14 based on the instruction of counsel?

15 A. I am.

16 Q. Okay. Are you aware -- strike that.

17 Have you made comments in the media about any
18 aspect of Teresa Steed's custody case?

19 MR. SCHAFFER: On advice of counsel
20 Mr. Jessop will refuse to answer that question and invoke
21 his right to remain silent as guaranteed by the Fifth
22 Amendment of the United States Constitution as well as
23 the Texas Constitution. This is based upon ongoing
24 criminal investigations by federal and state governments.

25 Q. (By Ms. Malonis) Are you refusing to answer

1 based on the instruction of counsel?

2 A. Yes, ma'am.

3 Q. Okay. Are you aware of whether a search
4 warrant was served on Teresa Steed?

5 A. I'm sorry about that, ma'am.

6 Could you please --

7 Q. Are you aware of a search warrant having been
8 served on Teresa Steed?

9 MR. SCHAFFER: On advice of counsel
10 Mr. Jessop will refuse to answer that question and invoke
11 his right to remain silent under the Fifth Amendment to
12 the United States Constitution as well as the Texas
13 Constitution. He doing so because there are currently
14 criminal investigations pending before the state and
15 federal government.

16 Q. (By Ms. Malonis) Are you refusing to answer
17 based on the instruction of counsel?

18 A. Yes, ma'am.

19 Q. Okay. Did you make comments in the media about
20 a search warrant having been served on Teresa Steed?

21 MR. SCHAFFER: Upon advice of counsel
22 Mr. Jessop will refuse to answer that question and invoke
23 his right to remain silent under the Fifth Amendment of
24 the United States Constitution as well as the Texas
25 Constitution. This is based upon criminal investigations

1 being conducted by the state and federal government.

2 Q. (By Ms. Malonis) Are you refusing to answer
3 based on the instruction of counsel?

4 A. Yes.

5 Q. Okay. Are you aware of whether a search
6 warrant was executed with respect to Teresa Steed?

7 MR. SCHAFFER: Well, we are going to
8 object that that's already been asked and the privilege
9 was invoked, but again, upon the advice of counsel
10 Mr. Jessop will refuse to answer that question and invoke
11 his right to remain silent under the Fifth Amendment of
12 the United States Constitution as well as the Texas
13 Constitution. He is doing so because of pending
14 investigations being conducted criminally by the state
15 and federal government.

16 Q. (By Ms. Malonis) Okay. Just to clarify, the
17 prior question was a search warrant was -- whether he was
18 aware that a search warrant was served, and then the next
19 question was whether a search warrant was executed, okay?

20 MR. SCHAFFER: It would be the same
21 objection --

22 MS. MALONIS: Okay.

23 MR. SCHAFFER: -- to both questions.

24 MS. MALONIS: Okay. You seem to think
25 that I asked the same question. I just wanted to

1 clarify.

2 Q. (By Ms. Malonis) Okay. Are you refusing to
3 answer based on the instruction of counsel?

4 A. Yes, ma'am.

5 Q. Okay. Are you aware of a meeting that was --
6 that took place between Teresa Steed and members of
7 what's known as CPS in the last two months?

8 MR. SCHAFFER: On advice of counsel
9 Mr. Jessop will refuse to answer that question and invoke
10 his right to remain silent under the Fifth Amendment of
11 the United States Constitution as well as the Texas
12 Constitution. This is based upon ongoing criminal
13 investigations being conducted by both the state and
14 federal government.

15 MS. MONTFORD: And on behalf of Annette
16 Jeffs I object to the form of the question. It was too
17 vague.

18 MS. MALONIS: Okay.

19 Q. (By Ms. Malonis) Are you refusing to answer
20 based on the instruction of counsel?

21 A. Yes, ma'am.

22 Q. Did you understand the question?

23 A. It seemed pretty vague, but --

24 Q. Okay. Let me restate the question.

25 MS. MALONIS: I'm sorry. Court reporter,

1 could you please read it back. I forgot what it was.

2 (The record was read as requested)

3 MS. MALONIS: Okay. I'll strike that
4 question and ask another.

5 Q. (By Ms. Malonis) Have you been present for any
6 meeting between Teresa Steed and members of CPS in the
7 last two months?

8 MR. SCHAFFER: I'll confer with my client
9 about whether or not he should invoke the privilege to
10 that question.

11 (Off the record discussion)

12 MR. SCHAFFER: Upon the advice of counsel
13 Mr. Jessop will refuse to answer that question. He's
14 doing so based upon his rights guaranteed under the Fifth
15 Amendment of the United States Constitution as well as
16 the Texas Constitution and because there's ongoing
17 criminal investigations being conducted by both the state
18 and federal government.

19 Q. (By Ms. Malonis) Are you refusing to answer
20 based on the instruction of counsel?

21 A. Yes, ma'am.

22 Q. Has Teresa Steed given you authority to
23 negotiate on her behalf in the custody suit?

24 MR. SCHAFFER: Upon advice of counsel
25 Mr. Jessop will not answer that question and invoke his

1 right to remain silent under the Fifth Amendment of the
2 United States Constitution as well as the Texas
3 Constitution. He is doing so because of ongoing state
4 and federal criminal investigations.

5 Q. (By Ms. Malonis) Are you refusing to answer
6 based on the instruction of counsel?

7 A. Yes, ma'am.

8 Q. Has anyone other than Teresa Steed given you
9 authority to negotiate on Teresa Steed's behalf in the
10 custody case?

11 MR. SCHAFFER: On advice of counsel
12 Mr. Jessop will refuse to answer that question and invoke
13 his right to remain silent under the Fifth Amendment of
14 the United States Constitution as well as the Texas
15 Constitution. He is doing because of ongoing criminal
16 investigations by both the state and federal government.

17 Q. (By Ms. Malonis) Okay. Are you aware of DNA
18 having been taken from Teresa Steed's child?

19 MR. SCHAFFER: On advice of counsel
20 Mr. Jessop will refuse to answer that question and invoke
21 his right to remain silent under the Fifth Amendment of
22 the United States Constitution as well as the Texas
23 Constitution. This is based upon ongoing criminal
24 investigations being conducted by the state and federal
25 government.

1 MS. MONTFORD: And on behalf of Annette
2 Jeffs I object to the form in that it assumes facts not
3 in evidence.

4 MS. MALONIS: Okay.

5 Q. (By Ms. Malonis) Are you refusing to answer
6 based on the instruction of counsel?

7 A. Yes, ma'am.

8 Q. Okay. Are you aware of whether any results
9 from a DNA test of Teresa Steed's child have been
10 returned to law enforcement or CPS?

11 MR. SCHAFFER: Upon advice of counsel
12 Mr. Jessop will refuse to answer that question and invoke
13 his right to remain silent under the Fifth Amendment of
14 the United States Constitution as well as the Texas
15 Constitution. This is based upon criminal investigations
16 being conducted by both the state and federal government.

17 Q. (By Ms. Malonis) Are you refusing to answer
18 based on the instruction of counsel?

19 A. Yes, ma'am.

20 Q. Are you aware of an order ordering Teresa Steed
21 to produce her child for CPS?

22 MR. SCHAFFER: On advice of counsel
23 Mr. Jessop will refuse to answer this question and invoke
24 his right to remain silent under the Fifth Amendment of
25 the United States Constitution as well as the Texas

1 Constitution. This is based upon ongoing criminal
2 investigations by both the state and federal government.

3 Q. (By Ms. Malonis) Are you refusing to answer
4 based on the instruction of counsel?

5 A. Yes, ma'am.

6 Q. Are you aware of whether Teresa Steed produced
7 her own biological child pursuant to the order of the
8 court?

9 MR. SCHAFFER: Upon advice of counsel
10 Mr. Jessop will refuse to answer this question and invoke
11 his right to remain silent under the Fifth Amendment of
12 the United States Constitution as well as the Texas
13 Constitution. He is doing so based upon the fact there
14 are ongoing criminal investigations being conducted by
15 the federal and state governments.

16 MS. MONTFORD: And on behalf of Annette
17 Jeffs I object to the form of the question.

18 MS. MALONIS: And what are your grounds?

19 MS. MONTFORD: Vague and too general.

20 MS. MALONIS: Okay.

21 Q. (By Ms. Malonis) Are you refusing to answer the
22 question based on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Okay. And did you understand the question?

25 A. It was -- I mean, it just seemed like it was

1 confusing on what your question was, but we'll stick with
2 the legal.

3 Q. Okay. So you're -- you're refusal to answer is
4 based on your counsel's instruction?

5 A. Yes, ma'am.

6 Q. Okay. Did you personally have anything do with
7 the decision about which child to produce pursuant to the
8 court's order to Teresa Steed to produce her child to
9 CPA?

10 MR. SCHAFFER: On advice of counsel
11 Mr. Jessop will refuse to answer that question and invoke
12 his right to remain silent under the Fifth Amendment of
13 the United States Constitution as well as the Texas
14 Constitution. This is based upon ongoing criminal
15 investigations being conducted by the state and federal
16 government.

17 MS. MONTFORD: And on behalf of Annette
18 Jeffs I object to the form, that it assumes facts not in
19 evidence and facts that are not in dispute.

20 MS. MALONIS: Okay.

21 Q. (By Ms. Malonis) And are you refusing to answer
22 based on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Okay. All right. Turning back to Exhibit 5,
25 which was your deposition from September, we now have

1 copies that we can both refer to. If you will turn to
2 what's marked as Page -- Page 30 of your deposition
3 transcript and I'm going to ask you, do you remember my
4 question this morning about -- any questions about the
5 UEP trust, not the specific questions but that I asked
6 you questions about that?

7 A. What was the question again, ma'am?

8 Q. Do you -- do you recall me asking you questions
9 this morning about the UEP trust --

10 A. You -- yes.

11 Q. -- generally?

12 A. Uh-huh.

13 Q. Okay. Now, on Page 30 of your deposition that
14 you gave in -- in September of '08 there's a discussion
15 about a trust.

16 Is that the UEP trust that you are talking
17 about?

18 MR. SCHAFFER: At this point Mr. Jessop
19 will refuse to answer that question based upon his Fifth
20 Amendment rights under the United States Constitution as
21 well as his rights under the Texas Constitution. And he
22 bases this upon the fact that there are ongoing criminal
23 investigations being conducted by the state and federal
24 governments.

25 In addition, questions about Mr. Jessop's

1 involvement with the UEP trust, if any, are abusive and
2 harassing because it has no connection to the facts
3 alleged in this case.

4 Q. (By Ms. Malonis) Are you refusing to answer
5 based on the instruction of counsel?

6 A. Yes, ma'am.

7 Q. Do you have an understanding of whether or not
8 Teresa Jeffs is a member of the beneficiary class of the
9 UEP trust?

10 MR. SCHAFFER: Upon advice of counsel
11 Mr. Jessop will refuse to answer and invoke his right to
12 remain silent under the Fifth Amendment of the United
13 States Constitution as well as the Texas Constitution.
14 This is based upon ongoing criminal investigations by the
15 federal and state government.

16 In addition, it is abusive and harassing
17 in that the UEP trust is not a party in this case and it
18 goes so far outside the subject matter that it results in
19 Mr. Jessop being harassed and abused by the questions
20 being posed to him.

21 Q. (By Ms. Malonis) Are you refusing to answer
22 based on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Okay. Mr. Jessop, do you have an understanding
25 of the relevance of the UEP trust in Teresa Jeff's

1 custody case?

2 MR. SCHAFFER: We object because it calls
3 for a legal conclusion, and also Mr. Jessop will refuse
4 to answer based on his right to invoke -- to remain
5 silent based upon the Fifth Amendment of the United
6 Constitution as well as the Texas Constitution. And we
7 are basing that upon the fact that there are criminal
8 investigations currently being conducted by both the
9 state and federal government.

10 Q. (By Ms. Malonis) Are you refusing to answer
11 based on the instruction of counsel?

12 A. Yes, ma'am.

13 Q. Okay. Do you have an understanding of whether
14 the UEP trust is relevant to Teresa Jeff's custody
15 litigation?

16 MR. SCHAFFER: Again, it calls for a legal
17 conclusion.

18 Secondly, Mr. Jessop is not qualified to
19 answer that.

20 Secondly, upon advice of counsel
21 Mr. Jessop will refuse to answer that question and invoke
22 the right to remain silent pursuant to the Fifth
23 Amendment of the United States Constitution as well as
24 the Texas Constitution, and he's basing this on the fact
25 that there are ongoing state and federal criminal

1 investigations.

2 Q. (By Ms. Malonis) Are you refusing to answer
3 based on the instruction of counsel?

4 A. Yes, ma'am.

5 Q. Okay. Do you make any decisions about how UEP
6 property is used?

7 MR. SCHAFFER: Upon advice of counsel
8 Mr. Jessop will refuse to answer that question and invoke
9 his right to remain silent under the Fifth Amendment of
10 the United States Constitution as well as the Texas
11 Constitution. He's basing this upon the fact that there
12 are ongoing state and federal criminal investigations.

13 Q. (By Ms. Malonis) Okay. Are you refusing to
14 answer based on the instruction of counsel?

15 A. Yes, ma'am.

16 Q. Do you have an understanding of who makes
17 decisions about UEP property --

18 MR. SCHAFFER: On the --

19 Q. (By Ms. Malonis) -- generally?

20 MR. SCHAFFER: -- advice of counsel
21 Mr. Jessop will refuse to answer this question and invoke
22 his right to remain silent under Fifth Amendment of the
23 United States Constitution as well as the Texas
24 Constitution. This is based on the fact there are
25 ongoing criminal investigations by both state and federal

1 governments.

2 Q. (By Ms. Malonis) Are you refusing to answer
3 based on the instruction of counsel?

4 A. Yes, ma'am.

5 Q. Okay. Do you -- do you know how it is
6 determined who is entitled to distributions from the UEP
7 trust?

8 MR. SCHAFFER: Upon advice of counsel
9 Mr. Jessop will refuse to answer this question and rely
10 upon his rights guaranteed under the Fifth Amendment of
11 the United States Constitution as well as the Texas
12 Constitution. We are basing this on the fact that there
13 are both federal and state criminal investigations
14 ongoing at this time.

15 Q. (By Ms. Malonis) Are you refusing to answer
16 based on the instruction of counsel?

17 A. Yes, ma'am.

18 Q. Is your involvement in UEP litigation on your
19 own behalf?

20 MR. SCHAFFER: Upon advice of counsel
21 Mr. Jessop will refuse to answer this question and invoke
22 his right to remain silent under the Fifth Amendment of
23 the United States Constitution as well as the Texas
24 Constitution. This is based on the fact there are
25 criminal investigations pending in both state and federal

1 government.

2 And in addition, these types of questions
3 are abusive and harassing in nature and we would object
4 on those bases.

5 MS. MALONIS: Okay.

6 Q. (By Ms. Malonis) Are you refusing to answer
7 based on the instruction of counsel?

8 A. Yes, ma'am.

9 Q. Okay. Has -- and I'm not sure if I have asked
10 this or not.

11 Has Teresa Jeff authorized you to represent her
12 interests in UEP trust litigation?

13 MR. SCHAFFER: Object on the grounds the
14 question has been asked and answered as well as the fact
15 that Mr. Jessop will refuse to answer based on the fact
16 that -- his guarantee by the Fifth amendment of the
17 United States Constitution and the Texas Constitution he
18 has the right to remain silent, and he invokes it at this
19 time. This is also based on the fact that there are
20 pending state and federal criminal investigations ongoing
21 at this time.

22 Q. (By Ms. Malonis) Are you refusing to answer
23 based on the instruction of counsel?

24 A. Yes, ma'am.

25 Q. Okay. Please -- strike that.

1 How many members of the beneficiary class of
2 the UEP trust have authorized you to speak on their
3 behalf?

4 MR. SCHAFFER: On advice of counsel
5 Mr. Jessop will refuse answer that question and invoke
6 his right to remain silent under the Fifth Amendment of
7 the United States Constitution and the Texas
8 Constitution. This is based upon the fact there are
9 ongoing criminal investigations in both the state and
10 federal government.

11 Q. (By Ms. Malonis) Okay. Do you refuse to answer
12 based on the instruction of counsel?

13 A. Yes, ma'am.

14 Q. Are you aware of whether there are any trust
15 entities established in Texas for the benefit of -- of
16 FLDS members?

17 MR. SCHAFFER: On advice of counsel
18 Mr. Jessop will refuse to answer that question and invoke
19 his right to remain silent under the Fifth Amendment of
20 the United States Constitution as well as the Texas
21 Constitution. This is based upon the fact that there are
22 ongoing criminal investigations being conducted by both
23 the state and federal government.

24 Q. (By Ms. Malonis) Okay. Are you refusing to
25 answer based on the instruction of counsel?

1 A. Yes, ma'am.

2 Q. Do you know who Bruce Wizen is?

3 A. I know who the individual is, yes.

4 Q. Okay. Does -- do you have an understanding of
5 his connection to the UEP trust? Let me clarify.

6 Do you know if he holds a particular position
7 with respect to the UEP trust?

8 A. I think he asserts some sort of position with
9 the trust.

10 Q. Okay. Do you -- do you have an understanding
11 of what that is, just in laymen's terms?

12 A. He's asserting some sort of control over the
13 trust.

14 Q. Okay. Do you -- do you deny that he has some
15 sort of control over the trust, or what is -- I don't
16 understand your answer that -- about what he is
17 asserting. I mean -- let me ask you, is that -- is it in
18 dispute whether he has control?

19 MR. SCHAFFER: Do you know?

20 A. I think -- I believe there is some legal
21 dispute over to what -- what he's trying to control and
22 does control.

23 Q. (By Ms. Malonis) So that may be in dispute?

24 A. Well, you are asking for a legal conclusion. I
25 can just give you my version of it, but --

1 Q. Well --

2 A. -- my version is, yes, there is some dispute.

3 Q. And I don't -- I don't -- I'm not -- I don't
4 mean legal conclusions. I just mean your opinion.

5 A. Oh. Well, my opinion is there's some dispute,
6 yes.

7 Q. Okay. All right. In your opinion, who has --
8 who controls the trust or who has the authority to
9 control the trust?

10 MR. SCHAFFER: Upon advice of counsel
11 Mr. Jessop will refuse to answer that question and invoke
12 his right to remain silent under Fifth Amendment of the
13 United States Constitution as well as the Texas
14 Constitution. He is doing so because of pending criminal
15 investigations by both state and federal government.

16 Q. (By Ms. Malonis) Are you refusing to answer
17 based on instruction of counsel?

18 A. Yes, ma'am.

19 Q. Okay. If you will hypothetically assume with
20 me that Teresa Jeffs is a member of the beneficiary class
21 of the UEP, what would be the process for making a claim
22 against the trust if you know?

23 MR. SCHAFFER: Mr. Jessop will refuse to
24 answer that question upon the advice of counsel and
25 invoke his right to remain silent under the Fifth

1 Amendment to the United States Constitution as well as
2 the Texas Constitution. This is based upon the fact that
3 there are ongoing criminal investigations by the federal
4 and state government.

5 Q. (By Ms. Malonis) Are you refusing to answer
6 based on the instruction of counsel?

7 A. I am.

8 Q. Okay. Do you have an understanding of whether
9 there is a process for beneficiaries of the trust to --
10 to make claims for distributions?

11 MR. SCHAFFER: Upon advice of counsel
12 Mr. Jessop will refuse to answer this question and invoke
13 his right to remain silent pursuant to the Fifth
14 Amendment of the United States Constitution as well as
15 the Texas Constitution. He is doing so because of
16 ongoing criminal investigations being conducted by the
17 state and federal government.

18 Furthermore, we object on the grounds that
19 this is another question regarding the UEP trust that is
20 abusive and harassing as it pertains to Mr. Jessop.

21 Q. (By Ms. Malonis) Okay. Are you refusing to
22 answer on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Can you tell me what a stewardship means?

25 MR. SCHAFFER: Upon advice of counsel

1 Mr. Jessop will refuse to answer this question and invoke
2 his right to remain silent under the Fifth Amendment of
3 the United States Constitution as well as the Texas
4 Constitution. This is based upon the criminal
5 investigations that are being conducted by both state and
6 federal government.

7 Q. (By Ms. Malonis) Okay. Are you refusing to
8 answer based on instruction of counsel?

9 A. Yes, ma'am.

10 Q. Okay. And Mr. Jessop, isn't true that in your
11 deposition in September you did discuss stewardships
12 without invoking a Fifth Amendment privilege?

13 MR. SCHAFFER: Upon advice of counsel
14 Mr. Jessop will refuse to answer this question and invoke
15 his right to remain silent under the Fifth Amendment of
16 the United States Constitution as well as the Texas
17 Constitution. This is based upon ongoing criminal
18 investigations by both the federal and state government.

19 Q. (By Ms. Malonis) Okay. Mr. Jessop, your
20 invocation of Fifth Amendment privileges recites by your
21 counsel an ongoing criminal investigation.

22 Which ongoing criminal investigation is that?

23 MR. SCHAFFER: At this time Mr. Jessop
24 will refuse to answer that question based upon his Fifth
25 Amendment privilege as well -- under the federal

1 constitution as well as the state constitution. As
2 counsel propounding these questions knows there are
3 federal investigations involving money laundering, mail
4 fraud, wire fraud, Mann Act violations in federal court,
5 in addition to any allegations being investigated by the
6 state authorities.

7 MS. MALONIS: For the record, this counsel
8 is not aware of that.

9 MR. SCHAFFER: You are now.

10 MS. MALONIS: Okay.

11 Q. (By Ms. Malonis) Mr. Jessop, based on what your
12 attorney said, are those investigations that began with
13 the raid of the ranch?

14 MR. SCHAFFER: Upon advice of counsel
15 Mr. Jessop will refuse to answer that question and invoke
16 his Fifth Amendment right under the United States
17 Constitution as well as his rights under Texas
18 Constitution. This is based upon ongoing criminal
19 investigations by both state and federal government.

20 Q. (By Ms. Malonis) Okay. Do you refuse to answer
21 based on instruction of counsel?

22 A. Yes, ma'am.

23 Q. Okay. Are you aware of any investigations that
24 have begun since September 22nd, 2008?

25 MR. SCHAFFER: Upon advice of counsel

1 Mr. Jessop will refuse to answer that question and invoke
2 his right to remain silent under the Fifth Amendment of
3 the United States Constitution as well as the
4 Constitution of the State of Texas. This is based upon
5 ongoing criminal investigations by federal and state
6 government.

7 Q. (By Ms. Malonis) Are you refusing to answer
8 based on instruction of counsel?

9 A. Yes, ma'am.

10 Q. Okay. Can you explain to me why you were able
11 to answer questions in September that you now must claim
12 a privilege?

13 MR. SCHAFFER: Upon advice of counsel
14 Mr. Jessop will refuse to answer based on his right under
15 Fifth Amendment of the United States Constitution as well
16 as the Constitution of the State of Texas. This is based
17 upon criminal investigations being conducted by federal
18 and state government. We also object on the grounds of
19 attorney/client privilege.

20 MS. MALONIS: Okay.

21 Q. (By Ms. Malonis) Are you refusing to answer
22 based on the instruction of counsel?

23 A. I am, yes.

24 Q. Okay. Are -- do you have any children who were
25 subject to a custody suit in Texas?

1 MR. SCHAFFER: Upon advice of counsel
2 Mr. Jessop will refuse to answer and invoke his right to
3 remain silent under the Fifth Amendment of the United
4 States Constitution as well as the Texas Constitution.
5 This is based upon ongoing criminal investigations by
6 both state and federal government.

7 Q. (By Ms. Malonis) Okay. Do you refuse to answer
8 based on the instruction of counsel?

9 A. Yes, ma'am.

10 Q. Okay. Were you ever a party to the custody
11 litigation in Texas in any of the cases? For instance,
12 Annette Jeffs is a party in -- in a case.

13 MR. SCHAFFER: Mr. Jeffs -- Mr. Jessop and
14 I will confer to discuss the invocation of privilege.

15 MS. MALONIS: Okay.

16 (Discussion off the record.)

17 Q. (By Ms. Malonis) Okay.

18 A. Could you ask the question again for me?

19 Q. Sure.

20 Have -- have you been a party in any of the
21 custody suits in Texas?

22 A. As far as any children involved or what --

23 Q. Yes.

24 A. I haven't had any children involved in the
25 custody of Texas.

1 Q. Okay. Do you know who the bishop of the FLDS
2 group in Texas is?

3 MR. SCHAFFER: On advice of counsel
4 Mr. Jessop will refuse to answer that question and invoke
5 his right to remain silent under the Fifth Amendment of
6 the United States Constitution as well as the Texas
7 Constitution. This is based upon ongoing criminal
8 investigations by the state and federal government.

9 MS. MALONIS: Okay.

10 Q. (By Ms. Malonis) Do you refuse to answer based
11 on the instruction of counsel?

12 A. I do, ma'am.

13 Q. Okay. What kind of authority over the FLDS
14 group does -- would a bishop of the group have?

15 MR. SCHAFFER: Upon advice of counsel
16 Mr. Jessop will invoke his right to remain silent under
17 Fifth Amendment of the United States Constitution as well
18 as the Texas Constitution. This is based upon ongoing
19 criminal investigations by both the state and federal
20 government.

21 MS. MALONIS: Okay.

22 Q. (By Ms. Malonis) Do you refuse to answer based
23 on the instruction of counsel?

24 A. Yes, ma'am.

25 Q. Okay. Do you hold a position of authority

1 within the FLDS community?

2 MR. SCHAFFER: On advice of counsel
3 Mr. Jessop will refuse to answer that question and invoke
4 his right to remain silent under Fifth Amendment of the
5 United States Constitution as well as the Texas
6 Constitution. This is based upon ongoing criminal
7 investigations by both the state and federal government.

8 MS. MALONIS: Okay.

9 Q. (By Ms. Malonis) Do you refuse to answer based
10 on the instruction of counsel?

11 A. Yes, ma'am.

12 Q. Do you have any decision-making power within --
13 over the FLDS group in Texas?

14 MR. SCHAFFER: On advice of counsel
15 Mr. Jessop will refuse to answer that question and invoke
16 his right to remain silent pursuant to the Fifth
17 Amendment of the United States Constitution as well as
18 the Texas Constitution. This is based upon ongoing
19 criminal investigations by both state and federal
20 government.

21 Q. (By Ms. Malonis) Okay. Do you refuse to answer
22 based on the instruction of counsel?

23 A. Yes, ma'am.

24 Q. Who is the prophet of the FLDS religious group?

25 MR. SCHAFFER: On the advice of counsel

1 Mr. Jessop will refuse to answer that question and invoke
2 his right to remain silent under the Fifth Amendment of
3 the United States Constitution as well as the Texas
4 Constitution. This is based upon ongoing criminal
5 investigations by both state and federal government.

6 Q. Okay. Do you refuse to answer based on the
7 instruction of counsel?

8 A. Yes, ma'am.

9 Q. Have you made statements in the media about the
10 policy of under-age marriage in the FLDS group?

11 MR. SCHAFFER: On advice of counsel
12 Mr. Jessop will refuse to answer that question and invoke
13 his right to remain silent under the Fifth Amendment of
14 the United States Constitution as well as the Texas
15 Constitution. That is based upon the fact there are
16 ongoing criminal investigations by the federal and state
17 government.

18 Q. (By Ms. Malonis) Okay. Do you refuse to answer
19 based on the instruction of counsel?

20 A. Yes, ma'am.

21 Q. What is the current policy of under-age
22 marriage in the FLDS group?

23 MR. SCHAFFER: Upon advice of counsel
24 Mr. Jessop will refuse to answer that question and invoke
25 his right to remain silent under the United States

1 Constitution and the Texas Constitution. This is based
2 upon the fact that there are ongoing criminal
3 investigations by the state and federal government.

4 MS. MALONIS: Okay.

5 Q. (By Ms. Malonis) Do you refuse to answer based
6 on the instruction of counsel?

7 A. Yes, ma'am.

8 Q. Okay. Were your statements that you made in
9 the media about under-age marriage true?

10 MR. SCHAFFER: Upon advice of counsel
11 Mr. Jessop will refuse to answer that question and invoke
12 his right to remain silent under the Fifth Amendment of
13 the United States Constitution as well as the Texas
14 Constitution. This is based upon ongoing criminal
15 investigations by both the state and federal government.

16 MS. MALONIS: Okay.

17 Q. (By Ms. Malonis) Do you refuse to answer based
18 on the instruction of counsel?

19 A. Yes, ma'am.

20 Q. Okay. Who within the FLDS group has the
21 authority to conduct a marriage?

22 MR. SCHAFFER: Upon the advice of counsel
23 Mr. Jessop will refuse answer that question and invoke
24 his right to remain silent under the Fifth Amendment of
25 the United States Constitution as well as the

1 Constitution of the State of Texas. This is based upon
2 ongoing criminal investigations by both federal and state
3 government.

4 Q. (By Ms. Malonis) Okay. Do you refuse to answer
5 based on the instruction of counsel?

6 A. Yes, ma'am.

7 Q. Okay. Have any marriages taken place within
8 the FLDS group in Texas since Warren Jeffs has been
9 incarcerated?

10 MR. SCHAFFER: Upon the advice of counsel
11 Mr. Jessop will refuse to answer that question. He will
12 invoke his right to remain silent under the Fifth
13 Amendment of the United States Constitution as well as
14 the Texas Constitution. This is based upon ongoing
15 criminal investigations by federal and state government.

16 Q. Okay. Do you refuse to answer based on the
17 instruction of counsel?

18 A. Yes, ma'am.

19 Q. Okay. Is Warren Jeffs the prophet of the FLDS
20 religious group?

21 MR. SCHAFFER: Upon advice of counsel
22 Mr. Jessop will refuse to answer this question and invoke
23 his right to remain silent under the Fifth Amendment of
24 the United States Constitution as well as the Texas
25 Constitution. This is based upon ongoing criminal

1 investigations by both federal and state government.

2 Q. (By Ms. Malonis) Do you refuse to answer based
3 on instruction of counsel?

4 A. Yes, ma'am.

5 Q. What -- what position within the FLDS does
6 Frederick Merrill Jessop hold?

7 MR. SCHAFFER: Upon the advice of counsel
8 Mr. Jessop will refuse to answer this question and invoke
9 his right to remain silent under the Fifth Amendment of
10 the United States Constitution as well as the
11 Constitution of the State of Texas. This is based upon
12 ongoing criminal investigations by both the federal and
13 state government.

14 Q. (By Ms. Malonis) Do you refuse to answer based
15 on instruction of counsel?

16 A. Yes, ma'am.

17 Q. Do you know Frederick Merrill Jessop?

18 MR. SCHAFFER: Upon advice of counsel
19 Mr. Jessop will refuse to answer this question and invoke
20 his right to remain silent under the Fifth Amendment of
21 the United Constitution as well as the Texas
22 Constitution. This is based upon ongoing criminal
23 investigations by both the federal and state government.

24 Q. (By Ms. Malonis) Do you refuse to answer based
25 on the instruction of counsel?

1 A. Yes, ma'am.

2 Q. Do you have an understanding of what a house of
3 hiding is?

4 MR. SCHAFFER: Upon advice of counsel
5 Mr. Jessop will refuse answer this question and invoke
6 his right to remain silent as guaranteed by the Fifth
7 Amendment of the United States Constitution as well as
8 the Texas Constitution. This is based upon ongoing
9 criminal investigations by the state and federal
10 government.

11 MS. MALONIS: Okay.

12 Q. (By Ms. Malonis) Do you refuse to answer based
13 on the instruction of counsel?

14 A. Yes, ma'am.

15 Q. Okay. Did anyone give you the authority to
16 make statements about the policy of under-age marriage in
17 the FLDS?

18 MR. SCHAFFER: Upon advice of counsel
19 Mr. Jessop will refuse to answer and invoke his right to
20 remain silent under the Fifth Amendment of the United
21 States Constitution as well as the Texas Constitution.
22 This is based upon ongoing criminal investigations by
23 both the state and federal government.

24 Q. (By Ms. Malonis) Okay. Are you involved in
25 negotiations of what's been termed a global settlement

1 with the UEP trust?

2 MR. SCHAFFER: Upon advice of counsel
3 Mr. Jessop will refuse to answer and invoke his right to
4 remain silent under the Fifth Amendment of the United
5 States Constitution as well as the Texas Constitution.
6 This is based upon the fact that there are ongoing
7 criminal investigations being conducted by both the state
8 and federal government.

9 In addition, questions about Mr. Jessop's
10 possible involvement with the UEP trust are abusive; they
11 are harassing; and they have no bearing on the underlying
12 litigation in this case.

13 (Witness sneezing)

14 Q. (By Ms. Malonis) Bless you.

15 A. Thank you.

16 Q. DO you refuse to answer based on the
17 instruction of counsel?

18 A. Yes.

19 Q. Is Rodney Parker one of your attorneys?

20 A. Yes. He was previous counsel.

21 Q. Okay. Is -- he's -- is he no longer counsel on
22 any ongoing matters?

23 A. It's a little bit complicated.

24 Q. Litigation, in any litigation. I mean, I
25 understand you might have an attorney just --

1 A. He's still doing -- he still does legal work
2 for me, yes.

3 Q. Okay. Let me clarify it further.

4 Does he represent you as a party in any ongoing
5 litigation where you are actually a party to a
6 litigation? Scratch that. I'll withdraw the question.
7 I'll withdraw it.

8 MS. MALONIS: Let's -- it's 12:00. Let's
9 go off the record for about 15 minutes and I might be
10 about done.

11 Let me just get my thoughts together,
12 okay?

13 A. Okay.

14 VIDEO TECHNICIAN: The time is 12:03 p.m.
15 and we are off the record.

16 (Recess from 12:03 to 12:25)

17 VIDEO TECHNICIAN: The time is 12:25 p.m.
18 and we are back on the record.

19 MS. MALONIS: Okay. I'm going to pass the
20 witness, but I want to just do a little housekeeping. We
21 had talked about how to certify questions for the hearing
22 this afternoon and we -- I think we have decided on the
23 court reporter reading the questions that we are going to
24 try to compel. If that's not -- if that's not the
25 procedure we are going to do, then I want to certify all

1 of the questions that he asserted a privilege on in
2 addition to any that I specifically asked to certify, and
3 with that I will pass the witness.

4 MR. DAVIS: Mr. Schaffer, I would like to
5 have an agreement at the outset that we can limit the
6 Fifth Amendment invocation to: I -- I plead the Fifth or
7 I invoke the Fifth. That's fine with me. And it would
8 be all -- all inclusive -- all inclusive of that what you
9 have said so far.

10 MR. SCHAFFER: Okay.

11 MR. DAVIS: Does that sound all right to
12 you?

13 MR. SCHAFFER: Fine.

14 MR. DAVIS: Okay.

15 EXAMINATION

16 BY MR. DAVIS:

17 Q. Mr. Jessop, my name is Jonathan Davis and I
18 represent Joseph Jeffs. I'm the attorney ad litem for
19 Joseph.

20 Do you know Joseph?

21 A. I -- I don't. I mean, I -- I know of him only
22 through just knowing that -- his list on children taken,
23 but that's all.

24 Q. You haven't spoken to him in the last month?

25 MR. SCHAFFER: Objection on the grounds of

1 the Fifth Amendment.

2 Q. (By Mr. Davis) How many times have you been
3 deposed?

4 A. I don't know.

5 Q. More than five and less than ten, or more than
6 ten and less than twenty?

7 A. Because I don't understand the legal parameters
8 of that, what do you mean by deposed? I've had a lot of
9 people fire a lot of questions off.

10 I mean, are you talking --

11 Q. Yes, sir --

12 A. -- depositions or --

13 Q. -- depositions where -- where you're not in a
14 courtroom but you are giving testimony under oath before
15 a court reporter.

16 A. Boy, not very many times. A couple.

17 Q. Less than five?

18 A. Probably -- probably be somewhere in that
19 neighborhood.

20 Q. Okay. Do you have the use of a house here in
21 San Angelo?

22 MR. SCHAFFER: Object on Fifth Amendment
23 grounds.

24 Q. (By Mr. Davis) Where is that house?

25 MR. SCHAFFER: Object on Fifth Amendment

1 grounds.

2 Q. (By Mr. Davis) Do you have the address of that
3 house?

4 MR. SCHAFFER: Object on Fifth Amendment
5 grounds.

6 Q. (By Mr. Davis) Do you rent or do you own that
7 house?

8 MR. SCHAFFER: Object on Fifth Amendment
9 grounds.

10 Q. (By Mr. Davis) How is that house paid for?

11 MR. SCHAFFER: Object on Fifth Amendment
12 grounds.

13 Furthermore, that's abusive and harassing
14 in that Mr. Jessop is not a party to this litigation.
15 He --

16 (Someone coughs)

17 THE REPORTER: I'm sorry. What -- what
18 was that, sir?

19 MR. SCHAFFER: I said he objects on Fifth
20 Amendment grounds.

21 Furthermore, that goes to the personal
22 affairs of this witness and we believe that it's abusive
23 and harassing.

24 Q. (By Mr. Davis) Have you visited Annette Jeffs'
25 house in New Braunfels?

1 MR. SCHAFFER: Object on Fifth Amendment
2 grounds.

3 Q. (By Mr. Davis) Do you know who pays for that
4 house?

5 MR. SCHAFFER: Object on Fifth Amendment
6 grounds.

7 Q. (By Mr. Davis) Do you know who supports Annette
8 Jeffs financially?

9 MR. SCHAFFER: Object on fifth Amendment
10 grounds.

11 MR. DAVIS: I'll pass the witness.

12 MS. MALONIS: Trevor?

13 EXAMINATION

14 BY MR. WOODRUFF:

15 Q. Mr. Jessop, my name is Trevor Woodruff. I'm an
16 attorney for the Department here today. Sir, I just have
17 one question for you.

18 At this time point in time do you know where
19 Teresa Steed's biological child is physically located?

20 MR. SCHAFFER: Object on Fifth Amendment
21 grounds.

22 Q. (By Mr. Davis) Are you asserting the Fifth
23 pursuant to your attorney's instructions?

24 A. Are you talking Teresa Jeffs?

25 Q. Teresa Steed.

1 Do you want me to reask the question?

2 MR. SCHAFFER: Object on Fifth Amendment
3 grounds.

4 Q. (By Mr. Woodruff) Well, just so we get it
5 straight for the record, Mr. Jessop, at this point in
6 time do you know where Teresa Steed's biological child is
7 physically located?

8 MR. SCHAFFER: Object on Fifth Amendment
9 grounds.

10 Q. (By Mr. Woodruff) So I'll ask you one more
11 question, Mr. Jessop.

12 Are you asserting the Fifth Amendment to that
13 question pursuant to your attorney's instructions?

14 A. Yes, sir.

15 MR. WOODRUFF: Pass the witness.

16 MS. MALONIS: Nothing further for the
17 witness.

18 Mindy?

19 MS. MONTFORD: I have no questions.

20 MS. MALONIS: Counsel?

21 MR. SCHAFFER: Nothing further.

22 MR. DAVIS: No, ma'am.

23 VIDEO TECHNICIAN: The time is 12:29 p.m.
24 and we are off the record.

25 (Deposition concluded at 12:29 p.m.)

1 CHANGES AND SIGNATURE

2 WITNESS NAME: WILLIE JESSOP DEPOSITION DATE: 1/29/09

3 PAGE LINE CHANGE REASON

4 -----

5 -----

6 -----

7 -----

8 -----

9 -----

10 -----

11 -----

12 -----

13 -----

14 -----

15 -----

16 -----

17 -----

18 -----

19 -----

20 -----

21 -----

22 -----

23 -----

24 -----

25 -----

1 I, WILLIE JESSOP, have read the foregoing deposition
2 and hereby affix my signature that same is true and
3 correct, except as noted above.

4

5 -----
6 WILLIE JESSOP

7 THE STATE OF -----)

8 COUNTY OF -----)

9

10 Before me, -----, on this day
11 personally appeared WILLIE JESSOP, known to me (or proved
12 to me on the oath of or through _____)
13 (description of identity card or other document)) to be
14 the person whose name is subscribed to the foregoing
15 instrument and acknowledged to me that he/she executed
16 the same for the purpose and consideration therein
17 expressed.

18 Given under my hand and seal of office on this
19 ----- day of -----, -----.

20

21 -----
22 NOTARY PUBLIC IN AND FOR
23 THE STATE OF -----

24 My Commission Expires: -----

25

26

1 NO. 2922

2 IN THE INTEREST OF) IN THE DISTRICT COURT

3 TERESA JEFFS,)) SCHLEICHER COUNTY, TEXAS

4 A CHILD)) 51ST JUDICIAL DISTRICT

5 REPORTER'S CERTIFICATION

6 ORAL VIDEOTAPED DEPOSITION OF WILLIE JESSOP

7 JANUARY 29, 2009

8 I, Tim Fails, Certified Shorthand Reporter in and

9 for the State of Texas, hereby certify to the following:

10 That the witness, WILLIE JESSOP, was duly sworn and

11 that the transcript of the deposition is a true record of

12 the testimony given by the witness;

13 That the deposition transcript was duly submitted on

14 ----- to the witness or to the attorney

15 for the witness for examination, signature, and return to

16 me by -----.

17 That the amount of time used by each party at the

18 deposition is as follows:

- 19 COUNSEL FOR THE WITNESS
- 20 MR. KENT A. SCHAFFER (0:00)
- 21 ATTORNEY AD LITEM FOR TERESA JEFFS
- 22 MS. NATALIE E. MALONIS (1:46)
- 23 COUNSEL FOR JOSEPH JEFFS
- 24 MR. JONATHAN R. DAVIS (0:02)
- 25 COUNSEL FOR ANNETTE JEFFS
- MS. MINDY MONTFORD (0:00)
- TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES
- MR. TREVOR A. WOODRUFF (0:01)

That pursuant to information given to the deposition

1 officer at the time said testimony was taken, the
2 following includes counsel for all parties of record:

- 3 COUNSEL FOR THE WITNESS
- 4 MR. KENT A. SCHAFFER
- 4 CO-COUNSEL WITH MR. SCHAFFER
- 5 MR. BRIAN W. WICE
- 5 ATTORNEY AD LITEM FOR TERESA JEFFS
- 6 MS. NATALIE E. MALONIS
- 6 CO-COUNSEL WITH MS. MALONIS
- 7 MS. ANGELA N. BASKERVILLE
- 7 COUNSEL FOR JOSEPH JEFFS
- 8 MR. JONATHAN R. DAVIS
- 8 MR. BRANDON S. ARCHER
- 9 COUNSEL FOR ANNETTE JEFFS
- 9 MS. MINDY MONTFORD
- 10 TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES
- 10 MR. TREVOR A. WOODRUFF

11 I further certify that I am neither counsel for,
12 related to, nor employed by any of the parties or
13 attorneys in the action in which this proceeding was
14 taken, and further that I am not financially or otherwise
15 interested in the outcome of this action.

16 Further certification requirements pursuant to
17 Rule 203 of TRCP will be certified to after they have
18 occurred.

19 Certified to by me on this ----- day of
20 -----, -----.

21
22
23
24
25

 Tim Fails, CSR
 Texas CSR 2931
 Firm Certificate #345
 2929 Carlisle Street, Suite 150
 Dallas, Texas 75204
 214.954.0352
 CSR Expiration Date: 12/31/10

1 FURTHER CERTIFICATION UNDER TRCP RULE 203 TRCP

2 The original deposition was/was not returned to the
3 deposition officer on -----.

4 If returned, the attached Changes and Signature
5 page(s) contain(s) any changes and the reasons therefor;

6 If returned, the original deposition was delivered
7 to Natalie Malonis, Custodial Attorney.

8 That \$----- is the deposition officer's
9 charges to the Attorney Ad Litem for Teresa Jeffs for
10 preparing the original deposition and any copies of
11 exhibits;

12 That the deposition was delivered in accordance with
13 Rule 203.3, and that a copy of this certificate was
14 served on all parties shown herein and filed with the
15 Clerk.

16 Certified to by me on this ----- day of
17 -----, -----.

18

19

20

Tim Fails, CSR
Texas CSR 2931
Firm Certificate #345
2929 Carlisle Street, Suite 150
Dallas, Texas 75204
214.954.0352
CSR Expiration Date: 12/31/10

21

22

23

24

25

