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CAUSE NO. DF-13-06713
1
 2
     IN THE INTEREST OF
                              § IN THE DISTRICT COURT
 3
 4
     L.L.C.
                               § 256TH JUDICIAL DISTRICT
 5
                                §
6
     MINOR CHILD
                       § DALLAS COUNTY, TEXAS
7
           ORAL AND VIDEO-RECORDED DEPOSITION OF
                  LAURISTON CROCKETT, III
8
                       Volume 1 of 1
9
                     November 8, 2022
10
11
       ORAL AND VIDEO-RECORDED DEPOSITION OF LAURISTON
12 CROCKETT, III, produced as a witness at the instance
13 of the Respondent, DIEM "NIKKI" NGO, and duly sworn,
14 was taken in the above-styled and -numbered cause on
15 November 8, 2022, from 9:21 a.m. to 4:50 p.m. before
16 Amy Sturgess, CSR No. 6993 in and for the State of
17 Texas, reported by Stenographic method, at the Law
18 Office of Brian Bagley, 701 East 15th Street, Suite
19 216, Plano, Texas 75074, pursuant to the Texas Rules
20 of Civil Procedure, Notice, and any provisions stated
21 on the record.
22
23
24
25 Job No. 39166
```

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21
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23
24
25
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PROCEEDINGS
1
2
                 THE VIDEOGRAPHER: This is Tape 1 in
3 the Video Deposition of Lauriston Crockett, III.
4 Today is Tuesday, November 8th, 2022. We are now on
  record at 9:21 a.m. The witness will now be sworn in.
6
                 THE REPORTER: Mr. Crockett, do you
7 understand that the testimony you give today will have
  the same force and effect as if you were in a court
9 before a judge and jury?
10
                 THE WITNESS: Yes, I do.
11
                 THE REPORTER: Will you raise your
12 right hand, please, and be sworn.
13
                 Do you solemnly swear, or affirm, the
14 testimony you shall give in this case will be the
15 truth, the whole truth, and nothing but the truth, so
16 help you God?
17
                 THE WITNESS: I swear.
18
                 THE REPORTER: Thank you.
19
                 Any agreements for the record?
20
                 MS. HAYES: Just by the Rules.
21
                 MS. LEWIS: Correct.
22
                 LAURISTON CROCKETT, III,
23 having been first duly sworn, testified as follows:
24
                        EXAMINATION
25 BY MS. HAYES:
```

1 Will you state your full name again. Q. 2 Lauriston Crockett. Α. 3 And what was the name you were given at Ο. 4 birth? 5 Lauriston Lee Crockett, Jr. 6 Ο. And do you -- my understanding is that you have a petition pending for a name change; is that 8 correct? That is correct. 9 Α. 10 And do you know how long ago that was filed? To the best of my -- no, I don't. I 11 12 believe --That's okay. And I was going to kind of 13 Q. 14 launch in with these questions, but let me kind of 15 give you some instructions before also. 16 Have you ever given your deposition 17 before? 18 Α. No, I have not. 19 It's kind of an informal conversation kind 0. 20 of like you and I are having. And if at any time you 21 don't understand my question, you're more than welcome 22 to ask me to rephrase it, try to present it in another 23 way. 24 From time to time, you're going to hear 25 your attorney lodge objections. And you are still

able to answer my question subject to her objection --2 Mm-hmm. Α. -- unless she specifically directs you not 3 Ο. to answer my question. Do you understand that? 4 5 Yes. Thank you. Α. 6 Ο. And it's hard for the court reporter to take 7 down uh-huhs and uh-uhs, although some court reporters tell me they can. Can we agree that you'll answer my 9 questions with yes or no if appropriate? 10 Α. Yes. Thank you. And I will try to not interrupt 11 12 you if you will do the same to me. I know sometimes 13 you can anticipate my question and want to jump to 14 answer. But if we can agree just to allow each other 15 to finish before the next person speaks, I think that 16 would help her out a lot. Would you be willing to 17 agree to that? 18 I totally agree. Α. 19 Okay. All right. And so we were just Ο. talking about your name change. What are you changing your name from and to? 21 22 Well, I'm changing my name from Lauriston Α. 23 Crockett, Jr., which was changed to William Lawrence 24 McQueary, which was changed back to Lauriston Lee

25 Crockett, Jr., by mistake. So we're taking care of a

```
mistake that was -- that happened --
2
            Okay. And --
       0.
3
       Α.
            -- by --
             -- how long ago did that mistake happen?
       Ο.
5
            That happened back in 1977, without my
       Α.
6 knowledge.
7
       Ο.
            Okay. And why was your name changed to
  William Lawrence McQueary?
            Well, my parents were divorced when I was
9
       Α.
10 three, and my father -- basically fathers didn't have
11 a lot of rights back then. So my father left when I
12 was approximately three and a half years old. My
13 mother remarried when I was around four, and she
14 married a gentleman by the name of William McQueary,
15 who is my stepfather. So we grew up in this
16 household.
17
                 At about around the age of 12 and a
18 half, my stepfather wanted us to take on his name.
19 And we were basically -- my sister, who was Lisa
20 Catherine Crockett, was pressured to take on a
21 different name. And being a young age, after enough
22 time you finally just kind of give in.
23 understand what it means to have a name changed.
24
                  So my mother came and spoke to me and
25 said, to keep peace in the house, would I consider
```

```
1 changing my name? So it was changed to William
2 Lawrence McQueary, McQueary being spelled
3 M-C-O-U-E-A-R-Y.
                  My father found us again when I was
  approximately 16 years old --
5
6
                  MS. HAYES: I'm going to object to
7 nonresponsive at that point.
8
       Α.
            Oh, I'm sorry. I wanted you -- I was trying
  to answer the -- the name, but that's fine.
10
                  MS. HAYES: Objection, sidebar.
            What -- did Mr. McQueary adopt you legally?
11
       0.
12
       Α.
            Yes, he did.
13
       Q.
            Okay. And in what year was that?
14
            Oh, my gosh. I don't remember. I was 13
       Α.
15 years old, maybe 14.
16
            And was the name change to William McQueary
17 as a result of that adoption?
18
            William Lawrence McQueary, yes.
       Α.
19
            And did you choose the name William?
       Ο.
20
            No. I was pretty much pressured into it.
21
            Okay. And at some point you resumed using
       0.
  the name Lauriston Crockett; is that correct?
22
23
       Α.
            Yes.
24
       0.
            What year was that?
25
       Α.
            That would have been approximately 1976,
```

```
1 1977.
2
            And under what circumstances did you resume
       Ο.
3 using the name Lauriston Crockett in 1976 to 1977?
            Well, my father, Lauriston Crockett, found
5 my sister and I again and made contact; and we made a
6 decision that I was going to go live with my father.
7 And of course with my being back with my father, I
8 wanted my original name back.
9
                  My father informed me, at that time
10 when I was born, that he wanted to name me Lauriston
11 Lee Crockett the -- the Third.
12
                  MS. HAYES: Objection, nonresponsive.
            What -- did you get legally adopted again
13
       Q.
14 after 1976 to 1977 by somebody else?
15
            I was legally adopted by my father,
       Α.
16 readopted by my father.
17
            Okay. There was a legal adopt -- there was
18 a formal adoption proceeding subsequent to 1977 to
19 initiate that?
20
       Α.
            Yes.
21
            And where was that out of?
       0.
22
            Fort Lauderdale, Florida.
       Α.
23
            What year was that, you said?
       Q.
            I believe, '76 or '77. It was right on the
24
       Α.
25 cusp, I believe.
```

1 So what years did you use the name William Q. McQueary? From the time I was 13 until the time I was 3 Α. 4 16. 5 And what years did you use the name 6 Lauriston Crockett, Jr.? 7 From the time I was one until the time I was Α. 8 13. And what -- when did you begin using the 9 Q. 10 name Lauriston Crockett, III? 11 When I was 16. Α. 12 Ο. And have you used that name since that time? Yes, I have. 13 Α. 14 Why are you just now initiating a proceeding Ο. 15 to legally change it to that? Well, when my father readopted me, our 16 17 attorney was Edward Stephany. Mr. Stephany came over 18 to the house, initiated the adoption. My father had a 19 copy of my old birth certificate. We discussed 20 changing, of course, my name not from Junior, which we 21 never wanted it to be, but to the Third. 22 Mr. Stephany made a mistake just by 23 taking the old birth certificate and -- and did that. 24 I really didn't find out much about that until my 25 father passed and I got another copy back of his birth

```
certificate.
1
2
             And when did your father pass?
3
             My dad passed about six years ago.
             Do you maintain a relationship with
       0.
5
  Mr. McQueary?
6
       Α.
             No. He's passed.
7
             When did he pass?
        Ο.
8
             You know, Kris, to the best of my knowledge,
  seven or eight years ago.
10
             Did you maintain a relationship with him at
11 the time of his death?
12
       Α.
             I -- I did, only because my mother was still
13 married with him. It was cordial, but -- at best.
14
       Ο.
             And the adoption proceeding where
15 Mr. McQueary adopted you, what -- what state or what
16 county was that out of?
17
             We lived in Dallas, Texas.
18
             So it's your understanding that there should
       Q.
19 be two adoption proceedings for you, one in Dallas for
20 Mr. McQueary and one in Fort Lauderdale for your legal
  father to readopt you?
21
22
       Α.
             Yes.
23
             Where do you currently reside?
        Q.
24
       Α.
             Plano, Texas.
25
             And how long have you resided there?
       Ο.
```

```
1
            Around eight -- around eight and a half
       Α.
2
  years.
3
            Can you tell us your address?
        Ο.
             2608 Wakefield Drive, Plano.
       Α.
5
            And how long have you resided at that
       0.
6
  address?
7
            Going on three years.
       Α.
8
        Ο.
            And where did you reside prior to that?
            Oh, my gosh. It's about a mile and a half
9
       Α.
10 away. I'm sorry, I'm trying to think of the street.
11 I totally blanked out on the street we lived on.
12 was a lease house.
13
       Q. Okay. And if we just leave a blank in the
14 transcript, when you review, will you be -- you be
15 able to fill that address in for us?
16
            Oh, absolutely I will.
17
                  (Request for Information to be filled
18 in on the Changes and Signature page at the end.)
19
            And you said you moved to Wakefield address
       0.
  approximately three years ago; is that right?
21
       Α.
            Yes.
22
        Q.
            And did you purchase that house, or are you
23 leasing that house?
24
       Α.
            Purchase.
25
       0.
            And who lives in that house with you?
```

Trang and Maxton Lee Crockett, I. 1 Α. 2 Okay. And who is Trang? Ο. 3 Trang is -- I guess you call her my partner, Α. 4 my future fiancée. What does future fiancée mean? 5 Ο. 6 Well, right now we've got two households 7 we're working with. We're planning on getting married, but we haven't made it official yet. 9 Q. Okay. And how long have you been involved 10 in a relationship with Trang? 11 A little over two years. 12 Ο. And she currently resides in your home? 13 Yes. Α. 14 And your son Maxton, I believe you said; is Ο. that correct? 15 16 Α. Yes. 17 And how old is Maxton? Ο. Maxton is approximately four and a half 18 Α. 19 weeks old. He was born on October 7th. 20 MS. LEWIS: (Coughs.) Pardon me. 21 MS. HAYES: Of course. What is your current telephone number? 22 Q. 23 214-682-1065. Α. 24 Have you utilized any other telephone number 25 in the last four years?

- A. No, ma'am.

 O. And what i
 - Q. And what is your date of birth?
- 3 A. April 12th, 1959.
- Q. And tell me about your educational
- 5 background; where did you go to school?
- 6 A. Graduated high school from Northeast High
- 7 School in Fort Lauderdale, Florida. Went to Broward
- 8 Community College, transferred up to University of
- 9 Florida, and I left there my sophomore year.
- I also have multiple certifications in
- 11 fitness from the Cooper Aerobics Center, Parker
- 12 College of Chiropractic, and also the Anglican School
- 13 of Theology.
- 14 O. And from -- you indicated that you left
- 15 college your sophomore year; is that right?
- 16 A. I did.
- 17 Q. Okay. And at the time that you resumed your
- 18 relationship with Lauriston Crockett, your father,
- 19 where were you residing?
- 20 A. Dallas, Texas.
- 21 Q. So explain to me, how were you living with
- 22 your father in Dallas, Texas; but you went to high
- 23 school in Fort Lauderdale?
- 24 A. Well, I finished high school in
- 25 Fort Lauderdale. I thought you wanted to know where I

```
1 graduated high school from.
2
                  When I was here in Dallas, I was
3 attending Florence Elementary School in Mesquite.
4 Then I went to Hill Junior High in Dallas and then
5 went on to Bryan Adams until my sophomore going to
6 my -- or excuse me -- my junior year.
7
            Of high school?
       Ο.
8
            Bryan Adams till my junior year; then I
  transferred to Fort Lauderdale.
10
            Okay. Let's back up a little bit. I've
11 obviously got something wrong in the timeline.
12
       Α.
            Okay.
            So you resided with your mother and
13
       Q.
14 Mr. McQueary until, you said, you were 16; is that
15 right?
16
            Approximately my junior year, yes.
17
            Okay. And that was in Fort Lauderdale?
       Q.
18
            No, ma'am. Dallas.
       Α.
19
            Okay. So Mr. McQueary and your mother were
       Ο.
  residing in Dallas at that time?
21
       Α.
            Yes, ma'am.
22
            But the adoption was out of Florida; is that
       Q.
23 right?
24
       Α.
            That is correct.
25
            Were you living in Florida at the time that
       Ο.
```

```
1 you were adopted by Mr. McQueary?
2
             I wasn't adopted. I was adopted back again
       Α.
3 by my father, Lauriston Crockett.
            I understand that. But the original
  adoption, you indicated, was by Mr. McQueary, correct?
5
6
       Α.
            When I was 13.
7
            Okay. And is -- that was in Fort
       Ο.
  Lauderdale, you indicated?
9
       Α.
            No, ma'am. Dallas.
10
            That was in Dallas, okay. Were both
11 adoption proceedings out of Dallas?
12
       Α.
            No, ma'am.
13
            Which one occurred out of Fort Lauderdale?
       Q.
14
            The one with my father, Lauriston Crockett.
       Α.
15
            Okay. So you began residing with Lauriston
       Ο.
16 Crockett again in Florida when you were 16; is that
17 right?
18
       Α.
            Yes.
19
            Okay. And who resided in that home with you
20
  and your father?
21
            My mother, Linda Crockett.
       Α.
22
            Okay. You indicated that your mother was
       Q.
23 still married to Mr. McQueary. Can you help me
24 understand that?
25
       Α.
             I have a very close relationship to my
```

```
1 stepmother, so I still call her my mother.
2
             Okay. So the woman your father was married
       Ο.
3 to at his passing, Lauriston Crockett, was not your
4 biological mother; is that right?
             That is correct.
5
       Α.
6
        O.
             Okay. Do you have any science background
  from your time in college?
8
       Α.
             Only basic courses.
9
             Have you ever been married?
       Q.
10
       Α.
             No.
11
            Have you ever been engaged?
       Ο.
12
       Α.
             Yes.
13
       Q.
            How many times?
14
             Two times.
       Α.
15
             And who were those women?
       Ο.
             Rhonda Sergeant and Lisa Fascenda.
16
17
             And do you maintain relationships with
       Q.
18 either of these women?
19
       Α.
             Yes.
20
        Ο.
             Which of these women do you still maintain
21 relationships with?
22
       Α.
             Both.
23
             Now, your current significant other, what is
       Q.
24 her last name?
25
       Α.
             Vo.
```

Can you spell that? 1 Q. 2 Α. V-O. 3 Okay. And is her first name T-R-A-N-G? Ο. 4 Yes, ma'am. Α. 5 And how old is Trang? Q. 6 Α. Trang just turned 41 in September. 7 Did you-all plan to have a child together? 0. 8 Α. No. 9 Does she speak English? Q. 10 Α. Yes. 11 Does she speak English fluently? Q. 12 Α. I believe so. We have no problem communicating. 13 14 Is her first language English? Ο. 15 Α. No. Is she a US citizen? 16 Ο. 17 Yes. Α. 18 Q. And how did you meet Trang? I met her on social media. 19 Α. 20 Which website? Ο. 21 Α. Facebook. 22 And did you post an ad, or did she? Q. 23 She did. Α. 24 Okay. And where did she post an ad on 25 Facebook?

- A. She already had a presence on Facebook, but I found an ad in Facebook Dating.
 - Q. And what was she looking for in her ad?
- A. Just friendship and a relationship. There
 wasn't even a picture on her -- on the Facebook. I

 just really happened to like what I read, and she
 seemed like a very sweet person. So I reached out to
- 8 her and said, I like what you had to say. I would
- 9 really like to meet you.
- 10 Q. And that was approximately two years ago?
- 11 A. Two and a half, two and a quarter, something
- 12 like that.

3

- Q. And does Trang have any other children?
- 14 A. Yeah, she does.
- 15 Q. How old are her other children?
- 16 A. Sydney is 19, and Amber is 13.
- 17 Q. Okay. And where do those two children
- 18 reside?
- 19 A. Well, sometimes at my home. And Trang also
- 20 has a home in McKinney, Texas, and where her mother
- 21 also lives.
- 22 Q. So let's talk about the 19-year-old. Does
- 23 she reside at home with her mother?
- 24 A. Yes.
- 25 Q. And what is her name again?

```
1
             Sydney.
       Α.
2
        Ο.
             Sydney.
3
       Α.
             Sydney.
             What is her last name?
4
        Ο.
5
       Α.
             Vo.
6
        Ο.
             Okay. And --
7
             To the best of my knowledge, it's Vo.
       Α.
8
        Ο.
             Okay. And the 13-year-old, what is her --
  his or her name?
10
             Her name is Amber.
       Α.
11
             Amber. And is her last name Vo as well?
        Ο.
12
       Α.
             To the best of my knowledge, it is.
13
             Okay. Does Amber spend time with her
        Q.
14 father, or do you know?
             Yes, she does.
15
       Α.
             And how often does Amber spend with her
16
17 father, if you know?
18
       Α.
             I -- I couldn't tell you.
             Has Amber resided or -- in your home at any
19
        Ο.
  time in the last 12 months?
20
21
       Α.
             Yes.
22
             And you're not aware of whether or not she
        Q.
23 goes to visit her father when she's residing in your
24 home?
25
             It's not a conversation we have. I do know
```

```
1 that I've asked about Amber, and she's out to dinner
2 with her father or spending with weekend with her.
3 But it's not something that we talk about other than,
4 Did you have a great time? It's good to see you.
5
            Okay. So you're not aware of whether or not
6 there's a schedule or a court order regarding Amber
  and her possession schedule with her father?
8
       Α.
             It really wasn't any of my business to ask.
9
            And you've indicated that Trang's mother
       Q.
10 lives in McKinney; is that right?
11
       Α.
            That is correct.
12
       Ο.
            And does Amber live predominantly with her
13 mother?
14
                 MS. LEWIS: Objection, form.
15
                  MS. HAYES:
                              That's fair.
16
       Ο.
            Let me rephrase that. Does Amber live
17 primarily with Trang?
18
       Α.
            Yes.
19
            Okay. Does Amber spend most of her time
  staying with Trang's mother?
            Well, we have different schedules. So Amber
21
       Α.
22 attends school in McKinney. And to answer your
23 question, Sydney goes to college, Collin County
24 College; and so Sydney spends definitely weekends and
25 also during the time -- she'll come visit during the
```

week also and weekends with us. 2 Ο. Where does Amber go to school in McKinney? I couldn't tell you. 3 Α. Does Trang work --4 Ο. 5 Α. Yes. 6 Ο. -- outside the home? 7 Yes, she does. Α. 8 Ο. What does she do? She has her own nail salon. 9 Α. And what's the name of it? 10 Ο. I've only been there once. Escape. 11 Α. And where is that located? 12 Ο. 13 Α. Sherman, Texas. 14 Ο. And is she currently working outside the 15 home? 16 Well, since we've just had a child on the 17 7th, we've decided that she's going to stay home for 18 six weeks; and then she'll be going back to work. 19 Okay. So she has approximately another week Ο. and a half home with the child? 21 Α. Yes. 22 Q. Okay. And are you currently supporting her 23 financially while she's taking this leave of absence 24 from work? 25 A. No, it's really not that way. I wouldn't

```
1 say financially supporting her. She makes a very good
2 living, herself.
3
          Have you given any monies to Trang for the
4 payment of her mortgage in the last 12 months?
5
       Α.
            Oh, no.
6
       Ο.
            Have you given any monies to Trang for the
7 payment of her vehicle in the last 12 months?
8
       Α.
            No.
9
            Has Trang given any monies to you to support
       Q.
10 your mortgage in the last 12 months?
11
       Α.
            No.
12
                  And please don't take my -- my smile as
13 anything other than, Trang is a wonderful person
14 and -- and very proud and hard worker. So when you --
15 when you ask these questions, it -- it doesn't -- it
16 doesn't compute with her.
17
                  MS. HAYES: Objection, sidebar.
18
       Q.
            So -- and I understand. I'm just trying to
  get to the basics of the information, so --
19
20
            Mm-hmm.
       Α.
21
            -- nonetheless.
       Ο.
22
                  What boards are you currently on?
23
             What boards am I currently on?
       Α.
24
       Ο.
            Mm-hmm.
25
       Α.
             I sit on the Plano Independent School
```

```
1 District Health Committee.
2
       Ο.
            Anything else?
3
            I've resigned from two other boards.
4 this time, to answer your question, I sit on the Plano
  Independent School District. I also sit on the Board
6 of Holy Nativity Church in Plano, Texas.
7
            What two boards have you recently retired
       Ο.
  from or resigned from?
            The Plano Parks and Recreation Planning
9
       Α.
10 Commission, and then there was a board where we
11 actually -- oh, my gosh, I've forgotten the name of
12 it -- where we actually went school to school and were
13 making decisions on how school funds were being used.
14 But I had to resign because of the time schedule and
15 having a baby on the way.
16
       Ο.
            How -- do you have any -- are you affiliated
17 with any political groups?
18
       Α.
            I'm registered as a Republican.
19
            Do you attend any regular meetings for
  Republicans in your county?
21
       Α.
            Not at this time.
22
            Did you previously dabble in politics
       Q.
23 locally?
24
       Α.
             I don't understand your question.
25
            Okay. Did you have political aspirations of
       O.
```

```
1 your own in the last five years?
2
       Α.
             I was presented it, and I gave it some
3 thought.
            Did you participate in any groups or
        Ο.
  affiliate yourself with any political groups to
6 further those aspirations?
7
       Α.
            Ms. Hayes, I'm sorry. I don't understand
  the question.
9
            Okay, fair enough.
       Q.
10
       Α.
             I do belong to the Golden Corridor.
            Are you in the Masons?
11
        Ο.
12
       Α.
             I was -- had my application in, but I put
13 that on hold at the time.
14
       Ο.
             Okay. How long ago did you put that on
15 hold?
16
       Α.
            About a year and a half.
17
            A year and a half ago?
       Q.
18
       Α.
            Mm-hmm.
19
            Okay. And how long had your application
        0.
20 been pending with the Masons at the time you put it on
21 hold?
22
            Well, there are two different Mason groups.
       Α.
23 You have Freemasons, and then you have York Masons. I
24 was putting my application in first with the York
25 Masons and then decided to put my application in and
```

```
1 start -- or excuse me -- start the application process
2 with the Freemasons here in Plano, Texas.
3
            Were you ever accepted into any Mason group?
       Ο.
            No. I didn't continue through the
5 initiations yet.
            Okay. And how long ago did you first
6
       Ο.
7 initiate a relationship with either of these Mason
  groups?
8
9
       Α.
            Oh, my gosh. Let me think. Three years
10 ago? Approximately. I -- to the best of my
11 knowledge.
12
       Ο.
            Have you done any -- well, let's talk about
13 your work for a second. How are you employed?
14
            I work for Genostim Performance Labs.
       Α.
15
                 THE REPORTER: Repeat that.
16
                 THE WITNESS: Genostim,
17 G-E-N-O-S-T-I-M, Performance Labs.
18
       Q.
            And how long have you been employed by
  Genostim Performance Labs?
19
20
          Since 2006.
       Α.
21
           Are you employed anywhere other than
       0.
22 Genostim Performance Lab?
23
            I am a Fox Radio and TV contributor for pet
       Α.
24 health and longevity, and I'm also the standing
25 bishop's chaplain and senior verger of Holy Nativity
```

```
1 Church here in Plano, Texas.
2
            Do you receive income as your role as a
3 bishop at Holy Nativity Church?
            I'm not a bishop. I'm a bishop's chaplain
5 and senior verger. And, no, I -- I won't -- won't
6 take any pay from the Church.
7
            Have they offered you pay?
       Ο.
8
       Α.
            No, because I made it very clear before I
9 took the position that --
                 MS. HAYES: Objection, nonresponsive
10
11 after no.
12
       0.
            Do you receive any income as your role as a
13 Fox Radio contributor?
14
       Α.
            No, ma'am.
15
            What is your primary source of income then,
       Ο.
16 just Genostim?
17
       Α.
            Yes.
18
            Is there any other resources from which you
       Q.
19 receive income?
20
       Α.
            No.
21
            And what is your salary at Genostim?
       Q.
22
            Right at 75,000.
       Α.
23
            And how long has that been your salary at
       Q.
24 Genostim?
       A. As of this year.
25
```

1 Was it more or less in prior year -- the Q. prior year? 3 Α. It was more. And what were you making last year? 5 Right at a hundred thousand, to the best of Α. 6 my knowledge. 7 In the last ten years, have you been paid Ο. anything over a hundred thousand dollars a year by 9 Genostim? 10 Α. Yes. What year do you recall making over a 11 12 hundred thousand dollars from Genostim? 13 I think in Year 2019, maybe 148,000; '20, a Α. 14 hundred and forty-nine. 15 Can you recall a year, let's say in the last 16 ten years, that you received over 149,000 in a year 17 from -- from Genostim? 18 Α. No, ma'am. 19 Now, what's your current child support that 0. you pay for Logan -- excuse me -- Lauriston Crockett? 21 \$1,250 a month. Α. 22 Do you -- have you ever been arrested? Q. 23 Α. No. 24 0. You've never been arrested in any state? 25 MS. LEWIS: Objection, form.

1 You can answer the question. Q. 2 Arrested? No, ma'am. Α. 3 Okay. Do you have any current medical Ο. conditions? 5 Α. Maybe not getting enough sleep. (Laughter.) 6 Ο. Other than that? 7 No. I'm in good health. Α. 8 Ο. Do you take medications? 9 Α. Only as needed. 10 You don't take any medications regularly? Ο. 11 No. Α. 12 Ο. Have you been prescribed any medications to 13 take regularly? 14 I've been prescribed medication to take as Α. 15 needed but not regularly. What medications have you been prescribed to 16 Ο. 17 take as needed? 18 Α. Alpralozam (phonetic). 19 O. Is that Xanax? 20 I think it's the generic, yes. 21 Okay. And anything else that you've been Ο. 22 prescribed to take as needed? 23 Α. Currently, no. 24 No blood pressure medication or cholesterol 25 medication or anything related?

- 1 A. No, no.
- Q. Okay.
- 3 A. No, I -- I don't take medications.
- Q. Okay. Anything that you can think of that
- 5 might affect your ability to testify truthfully today?
- 6 A. No, ma'am.
- 7 Q. Now, when you moved from your prior
- 8 residence to Wakefield, why did you move?
- 9 A. Hartford Drive. I believe that was -- that
- 10 was the address before that. Then we moved to Plano.
- 11 I'm sorry, it just -- it just came to me.
- 12 Q. Okay. So when you moved from Hartford Drive
- 13 to Wakefield, why did you move?
- 14 A. Why did we move? Well, rent was going up
- 15 through the roof, so it was the right thing to do.
- 16 Q. And when you said we, who was living with at
- 17 the time that you moved?
- 18 A. Lauriston Crockett, IV.
- 19 Q. So just to be clear, at the time you moved
- 20 from Hartford to Wakefield, you had Lauriston
- 21 Crockett, IV --
- 22 A. From Hartford to the new address. This
- 23 is -- I'm still drawing a blank of the address between
- 24 the two. Sorry. It'll come to me in a moment.
- 25 It's -- it's just a brain fog, so --

- 1 Q. Okay. No problem. I just --
- 2 A. But -- but, no, Lauriston wasn't with me
- 3 when I moved from my other address into the Wakefield
- 4 address.
- 5 Q. Okay. Let me ask it a different way.
- 6 A. Sure.
- 7 Q. Prior to your current address on Wakefield,
- 8 had you owned the home you were residing in?
- 9 A. No.
- 10 | Q. You pur- -- you indicated you purchased the
- 11 home on Wakefield; is that correct?
- 12 A. Yes.
- 13 Q. Why did you decide to purchase a home at
- 14 that time?
- 15 A. It just seemed like the right thing to do.
- 16 It was the perfect time to do it. Rent was going
- 17 through the roof, and it was easier to make a mortgage
- 18 payment than it was to pay the rent.
- 19 Q. At the time that you purchased your house,
- 20 Lauriston Crockett, IV, was not residing in the home
- 21 with you, you testified; is that right?
- A. He was not with me at the time, yes.
- 23 Q. Okay. Why did you decide to purchase a home
- 24 in Plano rather than closer to Lauriston Crockett at
- 25 that time?

- 1 A. I don't understand your question.
- Q. Where is the house on Wakefield; what city
- 3 is that in?
 - A. It's in Plano.
- Q. Okay. And where was Lauriston Crockett, IV,
- 6 residing at the time that you purchased that home?
- 7 A. I believe he was in an apartment in Highland
- 8 Park.
- 9 Q. My question is, why did you decide to
- 10 purchase a home in Plano rather than not -- purchasing
- 11 one closer to your son in Dallas?
- 12 A. Because Plano is my city to live in, and I
- 13 also hope to bring Lauriston back to the Plano School
- 14 District.
- 15 Q. Do you work for Genostim outside of the
- 16 home?
- 17 A. I have no idea what you just asked me.
- 18 Q. Do you have an office you go to every day?
- 19 A. No. We -- we -- I work, actually, in the
- 20 house.
- 21 Q. And you indicated in your testimony just a
- 22 few minutes ago that Plano is the city that -- for you
- 23 to live in. Can you tell me why it's the city for you
- 24 to live in?
- 25 A. Plano has excellent school systems, low

```
1 crime, and we have plenty of friends. And my church
2 is in this city, so this is just a choice that I made.
       Q. Have you done a comparison of the Plano
3
4 School District versus the Highland Park School
  District?
5
6
       Α.
            Yes, I have.
7
            Are you aware of which of those two schools
  has a better rating?
9
            They both have A ratings.
       Α.
10
            Are you aware of which of those two schools
11 has a better rating?
12
                 MS. LEWIS: Objection, form.
            Which schools?
13
       Α.
14
            Are you aware of whether Plano or Highland
15 Park has a better rating?
                 MS. LEWIS: Objection, form.
16
             I do not know the difference of the rating.
17
18 I do know that they both have Blue Ribbon AA
19 rating -- or A ratings, so...
                 MS. HAYES: Objection, nonresponsive
20
21 after, I don't know.
22
            What was the purchase price of your
       Ο.
23 Wakefield home?
24
       A. 513,000.
25
       Q. And you indicated that you were making just
```

```
under $150,000 at that time; is that right?
2
       Α.
             Mm-hmm.
3
             Is that yes?
        Ο.
             Yes. Oh, that's right. Yes.
       Α.
5
             And you testified that you -- you think in
       Ο.
6
  2019 you made $149,000; is that right?
7
       Α.
             I believe it was one forty-eight.
8
                  MS. HAYES: Let me get organized here.
9
             And while I'm looking for these exhibits, I
       Q.
10 also want to let you know that if at any time you need
11 to take a break to go to the restroom, just let me
12 know and we can take a break.
13
             Thank you.
       Α.
14
             Okay. So tell me again, and I apologize.
15 What -- what did you tell me the amount was for the
16 house at Wakefield?
17
             I believe it was 513,000.
       Α.
18
                  (Exhibit 12 marked.)
19
             I'm showing you what I have marked as
        Ο.
  Exhibit 12. Sorry to reach across.
20
21
                  Do you recognize this?
             Can't say that I do.
22
       Α.
23
             Do you recall filling out a loan application
24 for the purchase of that home?
25
       Α.
             Yes.
```

1 Okay. Q. 2 With the help of my CPA. Α. 3 Your CPA assisted you in completing a Ο. residential loan application? 5 Α. Yes. 6 Ο. Okay. And is that Ms. Taylor? 7 Yes, it is. Α. 8 Ο. And in what capacity did she assist you in completing a residential loan application? 10 MS. LEWIS: Objection, form. 11 I don't understand your question. 12 Ο. Well, what information did she put on this 13 residential loan application form for you? We just went through it line by line, 14 Α. covering it. 15 Okay. And it says at the top of this 16 Ο. 17 document that the amount that you were seeking was 18 \$410,000; is that right? 19 Α. It is. 20 Okay. Is it fair to assume that you had 21 other funds available for the down payment to make up 22 the difference in the purchase price? 23 MS. LEWIS: Objection, form. 24 Could you please ask your question again. 25 Sure. I'm going to ask you -- I understand Ο.

```
1 that you're looking at your phone. Is there something
2 going on that you need to take a break?
            No, ma'am. I just have it here just because
3
4 I have an infant at home and just in case Mom needs
5 anything. That's all. I'm not trying to take
6 anything off of what's going on. There's nothing
7 on -- other than just watching to make sure everything
  is okay at home.
            The $410,000 was the amount that you were
9
       Q.
10 seeking, or was that the purchase price of the
11 property?
12
       Α.
            No, that was not the purchase price of the
13 property.
14
       Ο.
            What was the purchase price?
15
            513,000, to the best of my knowledge, ma'am.
       Α.
            So the hundred thousand dollars that is not
16
17 reflected in this number, did you have those funds
18 available as a down payment?
19
                 MS. LEWIS: Objection, form.
20
       Α.
            They were borrowed.
21
            Okay. And who were they borrowed from?
       Ο.
22
            Because the corporation is involved and I'm
       Α.
23
  only an employee, I can give no more information about
24 that.
25
       Q. You're refusing to answer my question about
```

```
1 who you borrowed funds from?
2
            Since the corporation is involved, I'm
       Α.
3 refusing to answer any questions because I don't have
  the authority.
5
            You understand that the corporation is a
       0.
6
  participant and a party in this lawsuit, right?
7
             In which lawsuit?
       Α.
8
                  MS. LEWIS: Objection, form.
9
            Do you understand that the corporation has
       Q.
10 been brought in as a party and has answered in this
11 custody case?
12
       Α.
            Well, ma'am, to the best of my knowledge,
13 you brought two lawsuits against the corporation.
14
                  MS. HAYES: Objection, nonresponsive.
15
       0.
            It's just a yes or no, Mr. Crockett.
16 you aware that they're a party in this custody matter?
17
       Α.
            Yes.
18
            Okay. And so again, are -- is your
       Q.
19 statement to this Court that you borrowed a hundred
20 thousand dollars from some party in this lawsuit;
21 you're refusing to tell me who it is?
22
                  MS. LEWIS: Objection, form.
23
            My answer is -- is, the corporation is
24 involved. I'm only an employee of the corporation.
25 And if you need any other information, I would suggest
```

```
that you contact the -- the Board or the attorney
2 representing the corporation.
3
                  MS. HAYES: Objection, nonresponsive.
            Your testimony is that you're just a
4
  employee of the corporation?
5
6
       Α.
            Yes, ma'am.
7
        Ο.
            And you're -- the corporation you're
  referring to is Genostim?
            Genostim Performance Labs.
9
       Α.
            And do you recall listing yourself as the
10
11 owner of Genostim in the last three years?
12
       Α.
            No.
13
        Ο.
            You were previously the owner of Genostim;
14 isn't that right?
15
                  MS. LEWIS: Objection, form.
16
             I was the owner of an LLC.
17
            Your testimony is that you were not -- you
18 are not the owner of Genostim Performance Labs; is
19
  that right?
20
                  MS. LEWIS: Objection, form.
21
            My testimony is, I'm not the owner of
       Α.
22 Genostim Performance Labs.
23
             If you'll put that document back in front of
24 you, please, and turn to the second page and look up
25 at the top, you see that it lists Genostim Performance
```

```
1 Lab -- do you see that -- as your employment
2 information?
3
            I'm sorry, what page?
            The top of Page 2. Do you see that?
       Ο.
5
            (Shakes head side to side.)
       Α.
6
       Ο.
            You see that? And do you see that you
7 listed yourself as owner of Genostim Performance Lab
  and have been for 14 years?
9
       Α.
            No, ma'am. I'm trying to see where you're
10 talking about. Employment information.
11
            I'm giving you an opportunity to look at it,
12 Mr. Crockett. There's not a lot of information on
  that page. Do you see it?
13
14
             I'm -- I'm just looking for --
       Α.
15
                  MS. LEWIS: Objection, form.
16
       Α.
             -- I'm looking where it says...
17
            So I'm going to ask you again, are you the
  owner of Genostim Performance Lab?
18
19
            No, ma'am, I am not.
       Α.
20
       Ο.
            Okay. So if you stated that on a loan
21 application, that would be incorrect?
22
            I'm still trying to find where it is. I'm
       Α.
23 looking right here --
24
                  MS. HAYES: Can you point to your
25 client where this is, the top --
```

```
1
                  MS. LEWIS:
                              Top left.
2
                  MS. HAYES: -- of the document?
3
            Oh.
                  Sorry, I'm looking over here.
       Α.
                  Let's look at the date of this
5
  document.
6
       Ο.
            So just to be clear, in 2020 you applied for
7 a loan and indicated that you were the owner of
  Genostim Performance Lab, right?
9
                  MS. LEWIS: Objection, form.
10
                  MS. HAYES: What's your objection?
11
                  MS. LEWIS: Relevance, argumentive,
12 hearsay.
13
                  MS. HAYES: Hearsay is not an objection
14 for purposes of a deposition, so do you have an
15
  objection to the form of the question?
16
                  MS. LEWIS: I already listed them.
17
            You can answer the question.
       Q.
18
            What was your question again?
       Α.
19
            My question is, in 2020 you applied for a
       Ο.
  loan, a residential loan, indicating that you were the
  owner of Genostim Performance Lab; is that right?
21
22
            This is what the document says.
       Α.
23
            Okay. And so it also indicates that your
24 base income at that time was approximately $11,666 per
25 month; is that correct?
```

This is what the document says. 1 Α. 2 Okay. And previously you had told the Court Ο. 3 in this case that you didn't make more than \$50,000 in 2019; isn't that right? 5 Α. Yes. 6 Ο. Even though today you've testified that you made approximately \$140,000 in 2019? 8 Α. Well, these are different years, ma'am. 9 All right. Perhaps you didn't understand my Q. 10 question. 11 You testified in 2019 that you had only 12 earned \$50,000. Do you recall that testimony? 13 Α. No, ma'am, I do not. 14 Ο. Are you currently involved in any lawsuits other than this custody case? 15 MS. LEWIS: Objection, form. 16 17 Only the one that you've brought. Α. 18 MS. HAYES: Objection, nonresponsive. 19 Are you involved in any lawsuits other than Ο. this custody case? 20 21 MS. LEWIS: Objection, form. 22 Α. Yes. 23 Okay. And what lawsuits are those? Q. 24 Α. This --25 MS. LEWIS: Objection, form.

- 1 Q. You can still answer.
- 2 A. This has to do with a company who put in a
- 3 door, into the house.
- Q. Okay. Are you involved in any domestic
- 5 litigation, family -- other family law matters
- 6 currently other than this custody case?
- 7 A. I don't believe I understand your question.
- 8 Q. Are you involved in any litigation regarding
- 9 your son Maxton?
- 10 A. No.
- 11 Q. Are you involved in any other litigation,
- 12 other than this custody case and the door litigation
- 13 that you're involved in?
- 14 A. No.
- 15 Q. Now, you had previously filed a civil suit
- 16 in Collin County against several of the parties in
- 17 this case; is that right?
- MS. LEWIS: Objection, form.
- 19 A. I'm trying to remember what you're referring
- 20 to.
- 21 Q. Do you recall filing a lawsuit against Rob
- 22 Cottingham and Nikki Ngo, Catholic Dioces, and both of
- 23 Nikki Ngo's brothers last year in Collin County?
- 24 A. Yes.
- 25 O. And what was the basis of that lawsuit?

Abuse against a child. 1 Α. 2 And who is the subject child that you allege abuse occurred against? Lauriston Crockett, IV. 5 And at the time that you filed that lawsuit, the child had not been in your primary care for over two years; isn't that correct? 8 Α. Yes. Ultimately you decided to non-suit that 9 Q. 10 lawsuit; is that correct? 11 Α. I did. 12 Ο. And that was the second time that you had 13 filed a lawsuit outside of this custody case against 14 Nikki Ngo and Rob Cottingham; isn't that right? 15 Ma'am, I'm trying to remember. Α. Okay, no problem. We'll walk through it. 16 Ο. 17 Do you recall filing a case in Dallas 18 County, in civil court, against Rob Cottingham and 19 Nikki Ngo? 20 MS. LEWIS: Objection, form. 21 There has been so much that's taken place. Α. 22 If you can... 23 Do you recall filing a civil suit in Dallas

WENDY WARD ROBERTS & ASSOCIATES, INC. 972.494.2000

24 County against me individually and the lawyers in my

25 law firm?

```
1
                  MS. LEWIS: Objection, form.
2
       Α.
            No.
3
            You don't recall a case in Dallas County
       Ο.
4 against Rob Cottingham, Nikki Ngo, Justin Whiddon, and
  Kris Balekian Hayes?
5
6
                  MS. LEWIS: Objection, form.
7
            Oh, are you talking about the massage and
       Α.
  extract information from a child collusion?
9
                  MS. HAYES: Objection, nonresponsive.
            Do you recall filing the lawsuit or not?
10
11
                  MS. LEWIS: Objection, form.
12
       Α.
             I remember discussing it. I don't remember
13 it as being filed.
14
            Okay. Who is your civil attorney; who
       Ο.
  handles civil matters for you?
15
16
       Α.
            Drew Siegel.
17
            And is that the only lawyer that you use for
       Ο.
18
  civil matters at this time?
19
            Brian Bagley and Courtney Lewis.
       Α.
20
                  MS. LEWIS: Whenever it's convenient
21 for you, I could use a restroom break.
22
                  MS. HAYES: Okay. Give me just a
23 couple of minutes.
                  MS. LEWIS:
24
                              Thanks.
25
            And what do you allege was the basis of the
       Ο.
```

```
1 lawsuit that you filed in Dallas County against Nikki,
2 Rob, and the lawyers in my office?
                  MS. LEWIS: Objection, form.
3
             What is the basis of it?
4
5
             Sure. What was the -- what was the basis of
       0.
6
  your lawsuit?
7
                  MS. LEWIS: Objection, form.
8
       Α.
             I would have to say collusion.
             Collusion of what?
9
       Q.
10
             Evidence from an email that was written by
11 your partner, Mr. Whiddon, which was an exhibit put
12 linto court:
13
                  Sorry for the delayed response --
14
                  MS. HAYES: Objection, nonresponsive.
15
             What was --
       0.
16
       Α.
               The situation is very concerning --
             Mr. Crockett, you cannot --
17
       Q.
18
       Α.
               -- considered LC --
19
             Mr. Crockett, you can't --
        Ο.
20
       Α.
               -- in saying that Logan does not
21
                  actually fall off the bike.
22
             Mr. Crockett?
       Q.
               When is the next session with Rochelle
23
       Α.
24
                  Ritzi? You may have Logan talk to
25
                  Rochelle Ritzi or Vickie so they may
```

```
extract or massage out the information.
1
2
                  I do not advise that we seek any
3
                  emergency relief until we get the
                  additional information.
4
5
             Mr. Crockett, did you -- were you instructed
6
  to read that document into evidence today?
7
             No, ma'am.
       Α.
8
        Ο.
             Okay. And you heard my objection, right?
9
       Α.
             No.
10
             You didn't hear me object to nonresponsive
11 seven times during the course of that reading?
12
       Α.
             Ma'am, I was concentrating on reading.
             Is that a -- is that a no or a yes,
13
       Q.
14 Mr. Crockett?
15
       Α.
             That's a no.
16
             Okay. And you understand that when I lodge
17 an objection, you need to stop speaking so I can make
18 my objection on the record? Do you understand that?
19
       Α.
             I do now.
20
        Ο.
             Okay. And you've heard that several times
21 in a courtroom, have you not?
22
       Α.
             Sure.
23
             Okay. And as we sit here today, you're once
24 again trying to deliberately speak over somebody who
25 is trying to object, right?
```

1 Α. No. 2 MS. LEWIS: Objection, form. And you have been reprimanded in the past by 3 Ο. the Court for doing that exact thing; isn't that true? 4 5 MS. LEWIS: Objection, form. 6 Not to the best of my knowledge, I have not. 7 Can we agree that you will not do that again Ο. today; and when I lodge an objection, you will stop 9 speaking? 10 Yes, we can agree upon that. So again my question to you is, what was the 11 12 legal bases of your filing; what were your causes of 13 action, Mr. Crockett? 14 MS. LEWIS: Objection, form. 15 Mr. Cottingham and Nikki took Lauriston to Α. 16 the Highland Park Police Department trying to file 17 false charges on me of child abuse, that I hurt my 18 child. 19 And you believe that was the basis of the lawsuit that you filed in Dallas County? 20 21 I'm -- I'm sorry --Α. 22 MS. LEWIS: Objection, form. 23 -- I wasn't finished. Α. 24 Ο. My apologies. Please continue. 25 Α. Okay. Of course, Lauriston was taken aside

```
1 and interviewed by the Highland Park Police
2 Department.
3
                  MS. HAYES: Objection, nonresponsive.
            Do you understand what the legal basis is?
  The cause of action you have alleged, do you know what
5
6
  that means?
7
             I'm not an attorney, ma'am. I'd have to
  have my attorney explain it to me.
9
            And it's okay if you don't. I'm just trying
       Q.
  to get an understanding of, do you know what it means?
11
            I can't say that I have the correct
12 definition.
13
       Q.
           Okay. Do you recall filing a lawsuit in
14 Dallas County?
15
                 MS. LEWIS: Objection, form.
16
            Do you recall filing a lawsuit against
  Mr. Cottingham and Nikki Ngo in Dallas County, a
17
  separate lawsuit in a civil court?
18
19
            You would have to refresh my memory.
       Α.
20
       Ο.
            Is that a no?
21
            There's been -- there's been so much going
22 on in these cases, and I'll say it right now: I don't
23 know which one you're talking about.
24
            Okay. But you recall that you've sued Nikki
25 Ngo and Rob Cottingham at least twice outside of the
```

```
custody case in the last three years, right?
2
                  MS. LEWIS: Objection, form.
3
       Α.
             In the last three years?
             Correct.
4
        0.
5
             I'm sorry, ma'am, you would have to re- --
       Α.
6
  show me the documents.
7
             Is that a no, you don't recall that?
        Q.
8
       Α.
             I'm saying right now, I don't recall --
9
             Okay.
        Q.
10
             -- to the best of my memory, which -- which
       Α.
11 ones you're talking about.
12
        Ο.
             Okay. Do you currently have any living
13 family members?
14
       Α.
             Yes.
15
             Who are they?
        Ο.
16
       Α.
             My sister.
17
             What's her name?
        Q.
18
       Α.
             Lisa Catherine Garber.
             And where does she reside?
19
        0.
20
             In Garland, Texas.
       Α.
21
             Any other living family members?
        Q.
22
             My sister Courtney Christine Crockett.
       Α.
23
             And where does she reside?
        Q.
24
        Α.
             Seattle, Washington.
             Excuse me. Any other living family members?
25
        Ο.
```

1 My aunt, Nancy Crockett. Α. And where does she reside? 2 Ο. Boca Raton, Florida. 3 Any others that you can think of, any other 0. living family members? 5 6 Α. Elizabeth Crockett, Fort Lauderdale. 7 Okay. Anyone else? Ο. 8 Α. David Pulliam, my cousin who lives in Plano. Michael Pulliam, my cousin. I believe she lives in 10 Dallas. So that's my family. 11 Okay. And do you maintain a --Ο. 12 Α. Of ---- well, strike that. 13 Q. 14 Α. -- course, my -- my sons, Lauriston and 15 Maxton. Do you see any of the relatives that you had 16 Ο. 17 listed off, your living family members, let's say on a 18 monthly basis currently? 19 Α. Yes. And who would -- who do you currently see of 20 Ο. your living family members on a monthly basis? 21 22 My sister and my cousin David. Α. 23 Which sister do you see on a monthly basis? 24 Well, Lisa I see on a -- I speak to her two,

25 three times a day to see her. And then Courtney

```
1 Christine, we FaceTime.
2
            And how long have you been speaking to Lisa
3 consistently?
            Since 1959.
       Α.
5
            Your testimony is that there was not a
6 period of time where you and your sister did not have
7 a relationship since this litigation began?
8
       Α.
            Yes, we -- we did have a falling out at one
9 time when she was verbally attacked by Nikki Ngo.
10
                 MS. HAYES: Objection, nonresponsive
11 after yes and after period of time.
12
       Ο.
            What period of time did you not speak to
13 your sister Lisa?
14
             I don't recall really. A couple of years
       Α.
15 maybe, off and on, we wouldn't speak as often.
16
       Ο.
            And what year did you resume or rekindle
17 your relationship with your sister Lisa?
18
       Α.
            Well, my sister never -- and I never lost
19 contact.
20
            You just told this Court that you didn't
       0.
21 speak to each other for a couple of years. At what
22 point did you --
23
            No, I said we didn't speak on a daily basis
24 for a couple of years.
```

Q. Did you have a relationship with your sister

25

at the beginning of the litigation in this case? 2 Α. Yes. 3 And what was that relationship? Ο. She's my big sister. I don't understand Α. 5 your question. 6 Ο. How -- how close were you and your sister when this litigation began? 8 Α. We --9 Your sister Lisa. Q. 10 We had a falling out. Α. What does that mean, Mr. Crockett? 11 0. 12 Α. That means that my sister was verbally 13 abused by Nikki Ngo, and her feelings were hurt; and 14 she decided to distance herself a little bit. But we 15 stayed in contact. 16 Ο. Okay. So --17 And we -- and we both also took care of my Α. 18 mother together. 19 So when you had your falling out with your 20 sister Lisa, how frequently did the two of you 21 communicate? 22 Well, we had to communicate on a weekly Α. 23 basis because of my mother. 24 You previously testified in this case some 0. 25 pretty ugly things about your sister Lisa. Do you

```
1 recall that?
2
                 MS. LEWIS: Objection, form.
3
            No, ma'am, I don't recall that, to the best
       Α.
4 of my knowledge.
5
            Okay. Fair to say, you were unhappy with
       Ο.
6 your sister Lisa when this litigation commenced?
7
            And what year are you talking about now?
       Α.
8
       Ο.
            When this litigation commenced,
  Mr. Crockett.
9
10
            Which one?
       Α.
11
                  MS. LEWIS: Objection, form.
            We've been -- we've been doing this now for
12
       Α.
13 going on eight years.
14
       Ο.
            Well, you filed the lawsuit in this case.
15 Do you remember?
16
       Α.
            Mm-hmm.
17
            Okay. What year did you file that lawsuit,
       0.
18 Mr. Crockett?
19
            I believe it was Two Thousand -- is it five
       Α.
20 now? I don't recall when it started, it's been so
21 long.
22
            In 2017 when you filed your last
       Q.
23 modification in this case, what was your relationship
24 like with your sister Lisa?
            It was rebuilding itself because of the harm
25
       Α.
```

```
1 done.
2
             Great. And during that period of
       Ο.
3 rebuilding, how frequently did you and Lisa speak?
             Twice a week.
       Α.
5
             Your sister Courtney, do you, the two of
       0.
6 you, have what you consider to be a close
  relationship?
8
       Α.
             She's my little sister.
9
                  MS. HAYES: Objection, nonresponsive.
10
             Do you consider what -- your relationship
11 with Courtney to be a close relationship?
12
             Spoke to her on social media yesterday.
       Α.
13
                  MS. HAYES: Objection, nonresponsive.
14
        Ο.
             It's just a yes or --
15
       Α.
             Yes. Yes, I love my sister dearly.
16 loves me.
17
             Okay. And you indicated that there's one
       Ο.
  cousin that you speak to on a regular basis currently;
18
19 is that correct?
20
       Α.
             Yes.
21
            And who is that?
        Ο.
22
             David Pulliam.
       Α.
23
             And where does -- did you indicate that
       Q.
24 David resided?
25
             I -- I indicated that he lives in Plano.
```

And how far does David Pulliam live from 1 Q. 2 you? 3 Maybe 15 minutes. Α. What's the longest period of time that you went without seeing your sister Lisa in the last --5 6 MS. LEWIS: Objection, form. 7 0. -- ten years? 8 Α. I couldn't tell you. 9 Was it years? Q. 10 Α. No. Your sister came to a couple of hearings in 11 0. 12 this custody case; is that correct? 13 Yes. Α. 14 Did you ask your sister to come to the 15 hearings in this case? 16 No. She wanted to come. Did you ever ask your sister to testify in 17 Q. 18 any of the hearings in this case? 19 MS. LEWIS: Objection, form. Ask her to testify. We spoke about it, and 20 Α. 21 she said she's available to testify. 22 Q. Does that mean you asked her to come, and 23 she agreed that she would be available for you? 24 Α. Yes. 25 MS. LEWIS: Objection, form.

```
And she was asked to leave the courtroom the
1
       Q.
  last time she appeared in the courtroom; isn't that
3
  true?
            No, ma'am, that is not correct.
       Α.
5
             In fact, she was escorted out of the
       Ο.
6
  courtroom by a bailiff; isn't that correct?
7
       Α.
            No, ma'am --
8
                  MS. LEWIS: Objection, form.
9
             -- that is not correct.
       Α.
10
            At some point you filed a pleading asking
  that she supervise your access with Lauriston
11
12
  Crockett, IV; is that right?
13
                  MS. LEWIS: Objection, form.
14
       Α.
            Don't understand your question.
15
            Sure. In the last two years, you've filed
       0.
  several pleadings in this custody case asking that she
17 supervise your access with Lauriston Crockett, IV;
18 isn't that right?
19
       Α.
             Yes.
20
       Ο.
            Okay. And when did you decide that Lisa
21 would be an appropriate supervisor for your time with
22 Logan -- excuse me -- Lauriston Crockett, IV?
23
            Well, my sister is above reproach. She's
24 worked for the Garland Police Department for 30 years.
25 Her husband, Ted, was a lieutenant in the Garland
```

```
Police Department.
                  MS. HAYES: Objection, nonresponsive.
2
3
             I just need a date, Mr. Crockett.
       Q.
             I -- I don't have a date for you, ma'am.
4
       Α.
5
       Q.
            Okay.
6
       Α.
            I don't recall.
7
                  MS. HAYES: Okay, Courtney, I'll give
8
  you your break.
9
                  MS. LEWIS:
                              Thank you.
                  THE VIDEOGRAPHER: We're off record at
10
11 10:19 a.m.
12
                  (Recess from 10:18 a.m. to 10:31 a.m.)
                  THE VIDEOGRAPHER: We're back on record
13
14 at 10:31 a.m.
15
       Q. Okay. Mr. Crockett, when we left off, we
16 were talking about your sister. Are you still asking
17 that, if the Court orders supervised access, that you
18 would want her to supervise?
19
            Yes.
       Α.
20
            Is she willing to supervise?
21
            Yes.
       Α.
22
       Q.
            Now, have you in the past been diagnosed
23 with agoraphobia?
24
       Α.
            No.
25
            Have you seen any documents in this case
       0.
```

```
that indicate you were diagnosed with agoraphobia?
2
       Α.
            No.
3
            Did you do a psychological evaluation
4 previously where you went -- were diagnosed with
  agoraphobia?
5
6
       Α.
            To the best of my knowledge, no.
7
            Do you know what agoraphobia is?
        Ο.
8
       Α.
            Yes.
9
            Do you know remember Dr. Arauzo?
       Q.
10
       Α.
            Yes, I do.
11
            Do you recall him diagnosing you with
       Q.
12 agoraphobia?
13
       Α.
            No, I don't.
14
       O. Can you -- well, strike that.
15
                  Were you at the birth of your son,
16 Lauriston Crockett, IV?
17
             I was at the hospital.
       Α.
18
            Okay. And you were unable to go to the
       Q.
19 eighth floor; isn't that correct?
             It was the seventh floor. And, no, ma'am.
20
       Α.
21 I could go to the seventh floor.
22
            If you were able to go to the seventh floor
       Q.
23 of the hospital to see the birth of your son, why
24 didn't you do so?
25
       Α.
            Basically, I was uninvited.
```

- 1 Q. And you were uninvited by whom?
- 2 A. Nikki.
- Q. And you and Nikki were in a relationship at
- 4 the time?
- 5 A. Yes.
- 6 Q. Okay. But your testimony is that she didn't
- 7 want you at the birth of your son Lauriston Crockett,
- 8 IV?
- 9 A. Yes.
- 10 Q. Why did you tell Jennifer Frendle that you
- 11 were not present at the birth of your son Lauriston
- 12 Crockett, IV?
- 13 A. I don't recall.
- 14 Q. Have you ever taken a position about why you
- 15 weren't present for his birth other than the fact that
- 16 Nikki didn't invite you?
- 17 A. Yes.
- 18 Q. What was that position?
- 19 A. Nikki had basically asked me to move out,
- 20 and I was in the position of moving out at that time.
- 21 Q. Okay. Have you told anybody in this case,
- 22 any of the experts in this case, a reason why you
- 23 weren't at the birth of your son other than the fact
- 24 that Nikki didn't want you there?
- 25 A. To the best of my knowledge, no.

```
1
            Have you ever taken your son on vacation
       Q.
2 outside the state of Texas?
            We were heading out of the state; but, no,
3
4 we didn't make it.
5
                 MS. HAYES: Objection, nonresponsive
6 other than no.
7
            When was the last time you traveled outside
  the state of Texas?
9
            13 years ago.
       Α.
10
            You understand your son Lauriston Crockett,
11 IV, is on a travel hockey team, right?
12
            I do.
       Α.
          Okay. And are you able to take him to his
13
       Q.
14 various tournaments out of the state of Texas?
15
       Α.
          I am.
          Why haven't you left the state of Texas in
16
17 the last 13 years?
18
       Α.
           It's been a choice.
19
            And 13 years ago when you left the state of
  Texas, where did you go?
21
       Α.
            New Orleans.
22
            And how did you get there?
       Q.
23
            I drove.
       Α.
24
       O. You drove?
25
       Α.
           Mm-hmm.
```

- 1 And who was with you 13 years ago when you Q. went to New Orleans? Scotty Scott, Norman Scott. 3 Did you have your son at the time that you went to New Orleans? 5 6 Α. He wasn't born yet. 7 Ο. Now, Lauriston versus Logan -- there was a lawsuit in 2015 to determine whether the child would be called Lauriston or Logan; is that right? 10 Α. A lawsuit. Correct. There was a separate modification 11 0. 12 that was filed in 2015 for the sole purpose of 13 figuring out what this child was going to be called. 14 Do you remember that? I rem- -- I don't remember a separate 15 Α.
- Q. Do you remember the Court hearing the issue
- 18 of whether the child should be called Lauriston or
- 19 Logan?
- 20 A. In front of Judge Moore, yes.
- 21 Q. Okay. And do you believe that hearing was a
- 22 part of this modification, or do you know whether it
- 23 was a part of another modification?
- 24 A. I don't know.

16 lawsuit; no, I don't.

25 Q. Okay. What was your understanding of what

```
the Court ruled in regards to your son's name?
2
            That the child should be called whatever
       Α.
3 he'd like to be called.
            Does it bother you that sometimes your son
  is referred to as Logan?
5
6
       Α.
            Does it bother me?
7
             (Nods head up and down.)
8
       Α.
            I think whatever makes Lauriston happy, he
  should be -- be called that. It's in his best
10 interest. It doesn't matter about what I think.
11 in the best interest of what makes him comfortable.
12
       Ο.
            Okay. Has Lauriston Crockett, IV, told you
  that he wants to be called Lauriston?
14
       Α.
            No.
15
            But yet you call him Lauriston, don't you?
       Ο.
16
       Α.
            Yes.
17
            And he's told you he wants to be called
       0.
18 Logan, hasn't he?
19
       Α.
            Never.
20
            He has never told you he wants to be called
21 Logan?
22
       Α.
            No, ma'am.
23
            You've reviewed the notes in this case from
24 the expert witnesses regarding his preference of name,
25 have you not?
```

```
Yes, I have.
1
       Α.
2
            And is it your understanding that he has
  told the experts in this case he wants to be called
4 Logan?
5
                  MS. LEWIS: Objection, form.
6
            No, that's false.
7
            Okay. Who do you believe -- well, strike
       0.
8
  that.
9
                  Who did he tell he wants to be called
10 Lauriston to?
11
                  MS. LEWIS: Objection, form.
12
       Ο.
            You can answer.
13
       Α.
            Oh, thank you. Vickie Alexander, Jennifer
14 Frendle, Rochelle Ritzi, the staff at church, his
15 friends, his family.
16
       Q. So just to --
17
          And --
       Α.
18
            Sorry.
       Q.
19
            -- I believe, Dr. Threats.
       Α.
20
            So just to be clear, those are all the
       Q.
21 people that he's told that he want -- he prefers the
22 name Lauriston?
23
                  MS. LEWIS: Objection, form.
            Ma'am, it's -- it's in the record.
24
25
            I'm just trying to get some clarification,
       Q.
```

```
1 Mr. Crockett. You've indicated that he has told all
2 these people something. What has he told them? What
3 have you heard him tell them?
            I haven't heard --
       Α.
5
                  MS. LEWIS: Objection, form.
            As far as Jennifer Frendle, Vickie
6
       Α.
7 Alexander, and Rochelle Ritzi, it's actually in their
8 documented notes, when they asked him what he
9 preferred to be called, he said, I want to be called
10 Lauriston.
            So that's your understanding, that is your
11
12 son's preference; is that right?
            It's -- well, yes.
13
       Α.
14
            Okay. Do you know what he is called at
15 school?
            Which school?
16
       Α.
17
            The school your son currently attends.
       Q.
18
            He's -- he's called Logan at that school but
       Α.
19 never before.
20
       Ο.
            Okay. How long has your son been using the
21 name Logan at school?
22
            Approximately three and a half years.
       Α.
23
            And have you and your son discussed in the
24 last three and a half years what he would like to be
25 called?
```

1 No, we have not. Α. 2 Have you purchased hockey items for your son 3 in the last three and a half years that have the name 4 Lauriston --5 Α. (Coughing.) Excuse me. I apologize. 6 O. That's okay. 7 -- that have the name Lauriston on 8 them? I'm sorry, could you ask your question Α. 10 again? I was -- I was coughing. I apologize. 11 Sure, no problem. Have you ever purchased 12 any hockey items for your son that have Lauriston on 13 them? 14 Α. No. 15 Have you purchased any hockey items for your Ο. 16 son that have the name Logan on them? 17 Α. No. 18 In the past you've claimed that the use of Q. 19 Lauriston versus Logan is confusing to your son; is 20 that right? I believe it could be. 21 Α. 22 Okay. Do you believe that's still an Q. 23 ongoing concern for your son? 24 Α. I don't quite understand your question. Do you believe -- are you still concerned 25 0.

```
1 about him being confused by being called two different
2 names?
3
             I don't believe so anymore.
            Who is L IV?
       0.
5
            That would be Lauriston's nickname.
       Α.
6
       Ο.
            Does that stand for Lauriston, IV?
7
            Yes.
       Α.
8
       Ο.
            So just so I'm clear, do we have an ongoing
  problem in this case regarding what the -- name the
10 child should be called; or do you -- are you
11 comfortable with each person calling the name what --
12 the child what he decides to be called?
13
                  Terrible question. Let me try it
14 again.
15
             I believe I understand your question. It's
16 a good question.
17
       Q.
            Okay.
18
            It's a good question.
       Α.
19
                  As Lauriston's father, he is growing up
20 to be a fine young man, so I believe that it is up to
21 him and his -- whatever is in his best interest, what
22 he prefers, then I will support him.
23
            Do you recall a therapist in this case by
24 the name of Becky Bergthold?
25
       Α.
            Bergthold.
```

Do you recall the last time you had any 1 Q. 2 interaction with Ms. Bergthold? 3 Α. No. And the primary reason that Lauriston, IV, saw her was over this same issue; is that right? 5 6 Α. No. Not to the best of my knowledge, no. 7 That was a very small thing. 8 Ο. Okay. Did you ever see Ms. Bergthold for 9 anything personal for you, any sort of personal 10 therapy for you? 11 Α. No. 12 Ο. Were you ever diagnosed with obsessive 13 compulsive disorder? 14 Α. No. 15 Did Mr. Arauzo ever diagnose you with Ο. 16 obsessive compulsive disorder? 17 Α. No. 18 When did you last see Dr. Arauzo? Q. 19 I spoke to Dr. Arauzo probably on Zoom three Α. 20 months ago. 21 What do you recall Dr. Arauzo diagnosing you Ο. 22 with? 23 Dr. Arauzo had a possible suggestion; but it Α. 24 is my recollection, he said that he was incorrect. 25 MS. HAYES: Objection, nonresponsive.

What did Dr. Arauzo diagnose you with? 1 Q. 2 I don't believe he has ever diagnosed me Α. 3 with anything. Is he still your treating physician? 0. 5 Yes. I speak to him every six months. 6 Ο. And for what purpose do you speak to him every six months? 8 Α. For a prescription refill. 9 And what prescription does he refill for you Q. 10 every six months? 11 That would be Alpralozam [sic.] Α. 12 Ο. Is that the only prescription Dr. Arauzo 13 prescribes for you? 14 Α. Yes, ma'am. 15 Are you aware of whether you have updated Ο. 16 your records regarding your medical treatment by 17 Dr. Arauzo? 18 Α. They are updated every six months. 19 And have you delivered those to your 0. 20 attorney to supplement in this case? 21 Α. I -- no. 22 Dr. Guy Chandler, can you tell me who he Q. 23 was? 24 He was a child therapist that was seeing 25 Lauriston.

At any time did you also see Dr. Guy 1 Q. Chandler for therapy? 3 Α. No. Was he a child counselor, or was he a Ο. counselor for adults? 5 6 Α. To the best of my knowledge, he's a play 7 therapist for children. 8 Ο. And you don't recall ever having any therapy 9 sessions of your own with Dr. Guy Chandler? 10 For my personal or for finding information 11 about working with Lauriston? I don't understand your 12 question. 13 Q. Sure. 14 MS. HAYES: Objection, nonresponsive. 15 Let me ask that question a different way. Q. Do you recall having any one-on-one 16 17 sessions with just you and Dr. Guy Chandler? 18 Α. Yes. 19 For what purpose did you have those 20 sessions? 21 A. Discussing Lauriston. 22 At any time did you address any presenting Q. 23 issues you had during a one-on-one session with 24 Dr. Guy Chandler? 25 Α. No.

Do you recall telling Dr. Guy Chandler what 1 Q. the presenting issues were with your son? 3 I'm sorry. Could you rephrase that for --Α. Ο. Sure. 5 -- me, please? Α. 6 For what purpose did you take your son to 7 see Guy Chandler? 8 Α. We were discussing Lauriston's anxiety and 9 trying to gain knowledge as his father, trying to get 10 insight on how -- how to deal with Lauriston's 11 anxiety, being separated between two homes. 12 O. And do you -- when was the last time you spoke to Dr. Guy Chandler? 14 I don't recall. Α. 15 Was it within the last two years? Ο. I believe it was longer than that. 16 17 Okay. Now, Dr. Ritzi has been seeing Logan, Ο. or Lauriston, for almost three years; is that right? 18 I believe we're going on four. 19 Α. 20 Ο. Okay. And do you know what the therapy goals were between Logan and Dr. Ritzi? 22 I can't tell you that I do. Α. 23 Do you think your son has made progress as a 24 young man in seeing Dr. Ritzi over the last three or 25 four years?

1 Α. No. 2 What do you think -- you indicated earlier 3 when you testified that you believe your son is a fine 4 young man that's doing well. Can you tell me in what ways he is not progressing with Dr. Ritzi? I couldn't tell you. I basically have zero 6 Α. contact with Dr. Ritzi. 8 Ο. And why is that? 9 MS. LEWIS: Objection, form. 10 Why do you have zero contact with Dr. Ritzi? Dr. Ritzi has said that she is afraid of me, 11 12 number one. Number two, Lauriston has come to me 13 saying, Daddy, I -- Dr. Ritzi is on Mama's side. 14 Dr. Ritzi just recently, in her last 15 testimony, when we were in front of Judge Moore, said 16 again that she was afraid of me. And this leads to 17 countertransference of fear, when you have an adult 18 who can give no reason that I've ever been rude to 19 her. I've never raised my voice to her, I've never 20 threatened her in any way, but yet she still says that 21 she's afraid of me. 22 Dr. Threats and Dr. Arauzo and Forrest 23 Macfarlane have --24 MS. HAYES: I'm going to object as 25 nonresponsive at this point.

Why have you not reached out to Dr. Ritzi to 1 Q. 2 discuss your son's success in counseling? 3 Α. I have. Okay. When was the last time you reached out to Dr. Ritzi to discuss your son's success in 6 counseling? 7 Can't remember. Α. Q. Was it within the last two years that you reached out to Dr. Ritzi to discuss your son's 10 success? 11 Α. Yes. 12 Ο. And what was her response to you when you 13 reached out? 14 A. Dr. Ritzi --15 MS. LEWIS: Objection, form. -- is refusing to exchange emails, and she 16 17 only wants to do a Zoom call. 18 I did have contact with Dr. Ritzi when 19 we were seeing Dr. Threats for reunification because 20 of alienation. And Dr. Ritzi was in her office on 21 three different occasions, and so we had conversations 22 at that time. 23 0. Is the last time you spoke to Dr. Ritzi when 24 she was in Dr. Threats' office for reunification 25 therapy?

1 Personally, yes. Α. 2 Have you attempted to email Dr. Ritzi since the time that you were in Dr. Threats' office for reunification therapy with her? 5 Α. No, ma'am. 6 Ο. You originally filed this modification case back in 2017; is that right? 8 Α. Yes. 9 Okay. And that was based on CPS reports Q. that you had filed against Ms. Ngo and Mr. Cottingham; 11 is that right? 12 That is incorrect. Α. 13 How many times did you contact CPS in the Q. 14 year 2017 to file a complaint against Nikki Ngo or Robert Cottingham? 15 16 Ma'am, I can't answer that question, because 17 that's not what happened. 18 Do you recall contacting CPS to file a Q. complaint against Ms. Ngo or Mr. Cottingham in 2017? 19 20 Α. After speaking to -- let me rephrase that. 21 Lauriston made an outcry --22 MS. HAYES: Objection, nonresponsive. 23 It's just a yes or no, Mr. Crockett. Q. 24 Α. Ask the question again, please. 25 Sure. Do you recall filing a report with Ο.

```
1 CPS against either Nikki Ngo or Mr. Cottingham in
2 2017?
3
       Α.
            Yes.
            How many time -- how many reports did you
  file against either Nikki Ngo or Mr. Cottingham since
6 2017?
7
             I don't recall.
       Α.
8
            Do you remember what it is you reported in
  2017 to CPS regarding either Nikki Ngo or
10 Mr. Cottingham?
11
             I reported the findings of CPS.
12
                  MS. HAYES: Objection, nonresponsive.
             It's just a yes or no. Do you remember what
13
       Q.
14 you reported?
15
            To CPS?
       Α.
16
       O.
            Correct.
17
            Ma'am, you're asking a question that can't
18 be answered. I didn't report anything to CPS.
19
            Okay. Mr. Crockett, you just testified to
       0.
20 this Court that you filed a complaint with CPS against
21 Nikki Ngo or Mr. Cottingham in 2017. Do you remember
22 that testimony?
23
             Yes, ma'am, under the direction of CPS.
24
       0.
            Okay.
                  MS. HAYES: Objection, nonresponsive
25
```

```
1 after, yes, ma'am.
2
            When you called CPS in 2017 about Mr. Ngo --
  excuse me -- Mrs. Ngo or Mr. Cottingham, what did you
  say you were complaining about?
5
            Ma'am, this is where you are confused.
       Α.
6
                  MS. HAYES: Objection, nonresponsive.
7
                  (Exhibit 11 marked.)
8
       Ο.
             I'm going to show you what I have marked as
  Exhibit 11. You've had an opportunity to review the
10 CPS records in this case, have you not?
11
       Α.
            Yes.
12
       O.
            Okay. And you don't deny that you filed a
  CPS report against Mr. Cottingham, do you?
14
            Absolutely.
       Α.
            You deny contacting CPS regarding
15
       Ο.
16 Mr. Cottingham?
17
       Α.
            Yes.
18
            Okay. Do you --
       Q.
19
            No, I don't deny it. I did contact them on
       Α.
20 Mr. Cottingham.
21
            Okay. And you also contacted CPS regarding
       Ο.
22 Nikki Ngo's brother; is that correct?
23
            Which one?
       Α.
24
       0.
            Either.
25
       Α.
            Buck and Eddie Ngo?
```

```
1
       Q.
            That's correct. Did you contact CPS
  regarding either of her brothers?
3
            After Lauriston made an outcry, I did
  contact them again.
5
            Is that a yes?
       Ο.
6
       Α.
            Yes.
7
                  MS. HAYES: Objection, nonresponsive
8
  other than yes.
            And which brother of Nikki Ngo's did you
       Q.
  contact CPS to make a report about?
10
11
       Α.
            Both.
            And did you file a complaint against Nikki
12
       Ο.
13 Ngo with CPS?
14
       Α.
            Yes.
15
            So there's at least four CPS reports that
       0.
16 we've discussed. Is there any other individuals in
17 Nikki Ngo's life that you can think of that you've
18 filed a CPS complaint against since 2017?
19
            No, I believe that's...
       Α.
20
            And long and short of it is, there are
       Ο.
21 various times you made allegations that somebody was
22 sexually abusing your son; is that right?
23
            No.
       Α.
24
                  MS. LEWIS: Objection, form.
25
       Α.
            No, I did not.
```

```
Okay. What -- what was the basis of your
1
       Q.
2 allegations against Rob Cottingham?
3
            Lauriston, at the age of five and a half,
4 going on six, was coming home telling me that he was
5 sleeping in Rob Cottingham's bed and that Rob
6 Cottingham has a big, fat, stinky pee-pee. And, yes,
7 that was quite upsetting and very disturbing for any
  father to hear.
9
            And an investigation occurred, did it not?
       Q.
10
       Α.
            Yes.
            And all of those ruling -- all of those
11
12 allegations were ruled out, weren't they?
13
       Α.
            No.
14
            You're not aware of the disposition of the
  CPS cases, Mr. Crockett?
15
            It wasn't ruled out that Lauriston was
16
17 sleeping in his bed.
18
       Q.
           Okay. Any allegations of abuse/neglect were
19 ruled out; isn't that true?
20
       A. At the final hearing, I would have to say
21 yes. But, of course --
22
                 MS. HAYES: Objection, nonresponsive
23 after yes.
24
       Q. And what were the bases of your allegations
25 against Buck Ngo?
```

When we used to leave karate and I would

- A. Lauriston's outcry.
 - Q. And what was that outcry?
- 4 take Lauriston over to the house where he was living 5 with his parents -- and Nikki were living there
- with his parenes and winni were fiving energ
- 6 also -- Lauriston would go into screaming, crying
- 7 fits, not wanting to go into the house. I didn't
- 8 understand why.

2

3

- 9 Lauriston finally told me that Uncle
- 10 Buck was biting him, holding him upside down by his
- 11 ankles and throwing him on the couch. Lauriston said
- 12 that this was bad fun, because everyone else thought
- 13 it was funny; but it hurt him.
- He also said that his uncle was scaring
- 15 him and acting like he was going to throw him out of
- 16 the window. And Buck was also pulling his pants down,
- 17 laughing at him and embarrassing my child and
- 18 degrading the child and then saying, Oh, it wasn't me,
- 19 it wasn't me.
- 20 Q. Is that what you reported to CPS?
- 21 A. Yes.
- 22 Q. And an investigation occurred, didn't it?
- 23 A. Yes, it did.
- Q. And those allegations were all ruled out,
- 25 weren't they?

- A. No, they were not.
- Q. Do you recall seeing the disposition
- 3 paperwork in that case wherein all the allegations
- 4 against Buck were ruled out?
 - A. I don't recall.
- 6 Q. Okay. And I'm going to ask you the same
- 7 about Eddie. What allegations did you make against
- 8 Eddie to CPS?

1

5

- 9 A. Exposing himself to a child, getting into
- 10 the bathtub with my child, with -- my child told me
- 11 that he screamed, No, no, I don't want to do this.
- He also said that his uncle touched his
- 13 bottom and his pee-pee with his soapy hand. Then he
- 14 also said that his uncle got out of the bathtub and
- 15 exposed himself to my child.
- Q. And an investigation ensued, did it not?
- 17 A. Yes, it did.
- 18 Q. And -- and once again all of the allegations
- 19 were ruled out; isn't that true?
- 20 A. Not officially, no.
- 21 Q. Mr. Crockett, did you receive a copy of the
- 22 CPS findings of the investigation in the mail?
- A. In the mail? No, ma'am, I don't recall
- 24 doing that.
- 25 Q. Do you recall seeing the disposition report

```
1 of those cases indicating that those findings had been
2 ruled out?
             They had not been ruled out, to the best of
3
4 my knowledge.
5
            Okay. Have you seen now that they've been
       Ο.
6 ruled out?
7
            No, I have not.
       Α.
8
       Ο.
            Well, you understand the child is -- there's
  no injunctions regarding any family member of
10 Ms. Crockett -- excuse me -- of Ms. Ngo, right?
11
            At this time.
12
       Ο.
            Okay. And do you recall CPS testifying
13 about how you incessantly contacted them to report
14 offenses that allegedly occurred to your son?
15
                  MS. LEWIS: Objection, form.
16
       Α.
            No, ma'am, I don't recall that.
17
             In fact, they used the words, multiple phone
  calls to where their phone was ringing off the hook,
18
19 was their exact words. Do you recall that testimony?
20
       Α.
            No, I --
21
                  MS. LEWIS: Objection, form.
22
             -- I do not.
       Α.
23
                  MS. LEWIS: Please give me time to make
24 my objections.
25
                  THE WITNESS: Oh, okay.
```

```
Despite all of these cases, or at least the
1
       Q.
2 four we've discussed today being ruled out, you -- do
3 you continue to believe your child has been the
4 subject of some abuse?
5
       Α.
            Yes.
6
       Ο.
            Do you believe that to be physical abuse?
7
            I have proof of it, yes.
       Α.
8
       Ο.
            Okay. And do you believe that to be sexual
9 abuse?
            Never said it was sexual, but it was a
10
       Α.
11 question.
12
       Ο.
            But you -- sexual abuse was definitely
13 something that was investigated by CPS; would you
14 agree?
15
            I believe so.
       Α.
           And your son was subject to a forensic
16
17 examination as a result of these allegations; isn't
18 that correct?
19
       Α.
            Yes, he was.
20
            So as we sit here today, you believe your
21 son is being physically abused in his current
22 environment?
23
             I don't have the knowledge of that.
24
                  I'd like to rephrase that question,
25 please.
```

```
Your lawyer can take that up.
1
       Q.
2
                  Do you recall --
             Because I -- I need to recant that. That --
3
       Α.
  that is a wrong answer to your question.
5
            Okay. Well, you'll get an opportunity at
6 the conclusion of this deposition to review your
7 transcript, and any information that you think is
8 incorrect in that you'll have an opportunity to
9 rectify.
10
       Α.
            Well, sleeping with his mother at 11 and a
11 half years old --
12
                  MS. HAYES: Objection, nonresponsive.
13
            -- is abusive.
       Α.
14
                  MS. HAYES: Objection, nonresponsive.
15
            Again, Mr. Crockett, you can't just speak
       Ο.
  out of turn. When a question is asked, you can answer
  that question, okay? Do you understand?
17
18
       Α.
            Yes, ma'am.
19
            Okay. What is -- do you have any personal
       Ο.
  relationship with Mr. Cottingham?
21
       Α.
            No.
22
            When was the last time you spoke to
       Q.
23 Mr. Cottingham?
24
       Α.
            Spoke?
25
       Q. Correct. Either in person or on the
```

```
telephone.
1
2
            Mr. Cottingham and I had coffee one time
  five years ago.
            Would you say that the two of you have
  spoken in the last three years?
5
6
       Α.
            He verbally attacked me at a hockey game.
7
            Is that a yes?
       Ο.
8
       Α.
            Yes.
9
            And is that the only conversation you
       Q.
10 recall -- or interaction you recall having with
11 Mr. Cottingham in the last three years?
12
       Α.
             To the best of my knowledge, yes.
13
            Okay. And when he verbally attacked you at
       Q.
14 a hockey game, what were you doing at the hockey game?
15
            Just coming to see Lauriston play hockey.
       Α.
16
       Ο.
            And what did Mr. Cottingham say to you when
17 you came to see your son play hockey?
18
                  MS. LEWIS: Objection, form.
19
            He started screaming. We -- we were having
       Α.
20 a private conversation. I was trying to get to
21 Lauriston to say hello, letting him know that Daddy
22 was here. Mr. Cottingham cut me off before I could
23 get to Lauriston and stood in my way.
24
                  And I said, Excuse me, I'd like to
25 speak to my child.
```

```
Mr. Cottingham then starts screaming,
1
2 You called my wife a whore, you called my wife a
3 whore.
                  I immediately put my hands up and
5 backed up. I said, What are you talking about? I
6 haven't even spoken to Nikki, and made a complete
7 spectacle.
8
                 I immediately retreated and walked down
9 the ice, to the end of the ice rink. Mr. Cottingham
10 aggressively pursued me, and the -- forget his name.
11 I think it's Blake -- no. His first name was Brad.
12 He was head of the hockey rink. Stopped
13 Mr. Cottingham from physically --
14
                 MS. HAYES: Objection, nonresponsive at
15 this point.
16
            Well, no, ma'am. He kept screaming at me
17 and -- and was trying to physically abuse me.
18
            Sir, you don't get to decide or discern my
       Q.
19 objections. Do you understand?
20
       Α.
            Yes, ma'am.
21
           My question to you is, what did he say to
       0.
22 you, Mr. Cottingham say to you?
23
            Okay. Well, at the end of that, then he
       Α.
24 started screaming, You shouldn't be here, you
25 shouldn't be here, get out of here.
```

```
1
                  And that was the last conversation that
2
  we had.
3
            Okay. And did you call his wife a whore?
       Ο.
            No, ma'am.
4
       Α.
5
            And his wife is the mother of Lauriston
       Ο.
6
  Crockett, IV; is that right?
7
       Α.
            Correct.
8
            What was your intention in attending the
  hockey game on that particular event that you referred
  to where Mr. Cottingham yelled at you?
11
            Coming to watch Lauriston play hockey.
12
       Ο.
            Had you ever come to watch Lauriston play
13 hockey prior to that event where Mr. Cottingham yelled
14 at you?
15
       Α.
            No.
            What was special about the day that you came
16
17 to see Lauriston play hockey on that particular day?
18
            Well, they -- he was playing in Plano, and I
19 was going on a regular basis to watch Lauriston's
20 practices at the time. And overnight -- I went two
21 more times. He wasn't there on his regular hockey
22 team.
23
                  Come to find out they took him to
24 another rink, would not tell me where Lauriston was
25 playing, and it took me months to be able to find out
```

```
1 where my child was playing hockey.
2
                  MS. HAYES: Objection, nonresponsive.
             What was special about the day that you went
3
       0.
4 for the first time to see your son play in this hockey
  game where Mr. Crockett -- excuse me -- Mr. Cottingham
6 yelled at you?
7
             I was able to find him again to go watch
8
  hockey.
             Isn't it true that when you and
9
       Q.
10 Mr. Cottingham first met, that you threatened that he
  should never come near the school?
11
12
       Α.
            Ma'am, can you please restate your question?
            Sure. When you and Mr. Cottingham first
13
       Ο.
14 met --
15
            Mm-hmm.
       Α.
            -- when Nikki and Rob first began talking,
16
17 you called Mr. Cottingham and told him that he was not
18 allowed to come to the Prince of Peace School. Do you
19 recall that?
20
       Α.
             I delivered a message from Father Tom.
21
                  MS. HAYES: Objection, nonresponsive.
22
       Q.
             It's just a yes or no, Mr. Crockett. Do you
23 recall contacting Mr. Cottingham and telling him that
24 he is not allowed to come to the Prince of Peace
25 School?
```

1 Α. Yes. 2 Do you believe that conversation was threatening in nature? Α. No. 5 Did you follow up and send him some texts 0. 6 later that day regarding the same issue? 7 I don't remember. Α. 8 Ο. Isn't it true that you sent him text messages saying that he is not to go near school or 10 church for your son? 11 I don't know how I would have his phone 12 number. 13 MS. HAYES: Objection, nonresponsive. It's just a yes or no if you know. 14 Ο. 15 I don't remember. Α. Okay. Did Father Tom talk to you earlier 16 Ο. 17 that day about Rob and Nikki coming to see him at 18 school? 19 MS. LEWIS: Objection, form. 20 Α. Yes. 21 And what was the scope of -- well, strike Q. 22 that. 23 What did Father Tom tell you that Nikki 24 and Rob had come to see him on that day about? 25 MS. LEWIS: Objection, form.

That day? 1 Α. 2 O. Correct. It was prior to that day. 3 Okay. What did Dr. Fa- -- what did Father Ο. Tom tell you about why Nikki and Rob came to see him? 5 6 MS. LEWIS: Objection, form. 7 To change Lauriston's name from Lauriston to Α. Logan and request that the School use the name Logan. And nine days after that conversation 9 Q. 10 occurred is when you filed your CPS report against 11 Rob; isn't that true? 12 I don't remember. Α. 13 Q. Okay. Do you own any stock in Genostim 14 right now? 15 Α. No. 16 Ο. What officers at the company own stock; do 17 you know? 18 MS. LEWIS: Objection, form. 19 I can't talk about anything having to do Α. 20 with the corporation, ma'am. 21 Ο. Well, we've already established that you've 22 indicated you're the owner on a loan document. Are 23 you the owner? 24 Α. No. 25 Do you have any -- do you own any interest O.

```
1 in the entity?
2
                  MS. LEWIS: Objection, form.
3
            No, ma'am, not at this time --
       Α.
4
       0.
            Okay.
5
             -- I do not.
       Α.
6
       Ο.
            When this litigation commenced, you were
  also the owner. Do you recall that?
8
                  MS. LEWIS: Objection, form.
9
             I was a stockholder.
       Α.
            Do you recall testifying in five hearings in
10
  this case that you were the owner of Genostim?
11
12
       Α.
             I recall, the best of my knowledge, that I
13 was a stockholder.
14
       Ο.
            Okay. And what hours do you work?
15
            My day starts at 8:00 o'clock in the morning
16 and can continue off and on until 11:00 o'clock at
17 night.
18
            What's your title at the -- Genostim?
       Q.
19
            President.
       Α.
20
       0.
            And what does the president -- what do you
21 do as the president of Genostim; what's your job
22 description?
23
            Ma'am, I'm not going to talk about anything
24 having to do with the corporation. I have not been
25 given the right to talk about anything that has to do
```

```
1 with Genostim Corporation.
2
            Mr. Crockett, are you refusing to tell the
       Ο.
  Court what you do at Genostim as their employee?
             I take care of daily affairs.
4
5
            And what does that entail?
       0.
6
       Α.
            Phone conversations, creativity, and
  marketing.
8
        Ο.
            What does Genostim do?
9
            Ma'am, I'm not going to talk about anything
       Α.
10
  that has to do with corporation.
11
            Okay. So just to be clear, you're refusing
12 to tell the Court what your employer does.
13
                  MS. LEWIS: Objection, form.
14
       Α.
            Ma'am, I'm not going to talk about anything
15
  having to do with the corporation.
16
       Ο.
            It's a yes or no, Mr. Crockett. Are you
17 refusing to tell the Court what Genostim does?
18
       Α.
            Yes.
19
        Ο.
            And who owns Genostim?
20
       Α.
            Ma'am, I can't give you information having
  to do anything with the corporation.
21
22
            You're refusing to tell the Court who owns
       Q.
23
  the company that you work for; is that right?
            Yes, ma'am.
24
       Α.
25
            Okay. What is L IV Performance?
       Ο.
```

1 It is a corporation name. Α. And what does L IV Performance do? 2 Ο. 3 Ma'am, I can't talk about anything having to 4 do with the corporation. (Exhibit 14 marked.) 5 6 I'm showing you what I've marked as Exhibit 14. 8 Α. Mm-hmm. 9 You filed a franchise tax report indicating Q. 10 that you're the director of L IV Performance; is that 11 right? 12 What is the date of this document? Α. 13 It's down at the bottom, sir. 2021. Q. 14 Right, 2021. Α. 15 Okay. And you indicate that you're the 0. 16 president and the sole director of that entity; is 17 that right? 18 Α. No, ma'am. 19 That's not what this document purports to 0. 20 show? 21 That was in 2021. Α. 22 Okay. And has that changed? Q. 23 Yes. Α. 24 So in 2021 you were the sole director and 25 president of L IV Performance, but you're no longer;

```
1 is that right?
2
            I am no longer a director.
            Okay. And when did that occur -- when did
3
       Ο.
4 that change?
5
       Α.
            Ma'am, I can't talk about anything having to
6 do with the corporation.
7
            Mr. Crockett, I'm going to file a motion for
       0.
8 contempt if you refuse to give this information. I'm
9 asking you this information. You're here today to
10 give your testimony.
11
                 When did you no longer become the
12 director of L IV Performance?
13
       A. To the best of my knowledge, it would be on
14 the 25th of 2021.
15
       Q. So the day after you filed the franchise
16 report on August the 24th of 2021, you changed your
17 status from director of that entity; is that right?
18
       Α.
            Ma'am, to the best of my -- I don't
19 remember.
20
       0.
            Okay. Under what circumstances were you no
21 longer the director of L IV Performance?
22
                 MS. LEWIS: Objection, form.
23
            Ma'am, I'm not going to give you the
24 information about the corporation's --
25
       Q. Were you --
```

-- affairs. 1 Α. 2 Were you terminated by L IV Performance? Ο. MS. LEWIS: Objection, form. 3 Ma'am, I'm not going to give you any Α. information about the corporation. 5 6 Ο. Okay. Sir, I'm not asking for information about the corporation. I'm asking for information 8 about you. 9 You're asking if I was terminated? Α. 10 Ο. Correct. 11 MS. LEWIS: Objection, form. 12 Α. The position was taken, yes. 13 Q. Okay. Were you paid any resources or paid any monies as severance from L IV Performance? 15 Α. No. 16 Did you receive any funds whatsoever from 17 L IV Performance at the time of your departure? 18 Α. Ma'am, to the best of my knowledge, no. 19 You don't recall if you got any money from 0. L IV Performance last year? 21 MS. LEWIS: Objection, form. 22 I received a salary. Α. 23 Did you receive any funds from L IV 24 Performance at the time of your departure in 2021? 25 MS. LEWIS: Objection, form.

- 1 A. I don't really understand the question.
- Q. It's not a difficult one. Did you get --
- MS. LEWIS: Objection, form.
- 4 Q. -- money when you left L IV Performance?
- 5 You said you were no longer the director in 2021.
- 6 A. Was I -- so I want to make sure that I
- 7 understand the question.
- 8 O. Mm-hmm?
- 9 A. Are you saying, was I paid?
- 10 Q. I'm saying, at the time that you parted ways
- 11 with L IV Performance or the position was terminated
- 12 or whatever circumstances you're refusing to disclose
- 13 to this Court, were you given any resources in
- 14 exchange for that?
- MS. LEWIS: Objection, form.
- A. Well, ma'am, the reason why it's difficult
- 17 to answer the question, because I don't believe you
- 18 know what you're talking about.
- 19 MS. HAYES: Objection, nonresponsive;
- 20 objection, sidebar.
- 21 Q. You've indicated to this Court that your
- 22 position with L IV ceased in 2021, right?
- 23 A. Ma'am, L IV Performance Lab Corporation is a
- 24 corporation, and Genostim Performance Labs is a legal
- 25 DBA that is L IV Performance Lab Corporation.

```
MS. HAYES: Objection, nonresponsive.
1
2
             In 2021 you told, when you filed the
        Ο.
  franchise tax report --
             I received a loan.
       Α.
5
             -- that you were the director of L IV
6
  Performance. We agreed to that --
7
                  MS. LEWIS: Objection --
8
       Ο.
             -- right?
9
                  MS. LEWIS: Objection, form.
10
       Ο.
             And this has your signature at the bottom of
  this document, does it not?
11
12
       Α.
             Which, this document right here?
13
            Mm-hmm, Exhibit 14.
       Q.
14
             This document right here?
       Α.
15
             That's right, sir.
       Ο.
             You know, I'd have to ask the CPA, because
16
17 she filled out this information.
18
       Q.
           Okay. So let me -- let me simplify this.
19
                  Mr. Crockett, we've had numerous
  hearings in this case, right?
21
       Α.
             Yes.
22
             And several times prior to 2019, you
        0.
23 indicated that you were the director of L IV
24 Performance, right?
25
             No. This is where the confusion comes in.
       Α.
```

```
1
                 MS. HAYES: Objection, nonresponsive
2
  after no.
            So I'll have to say no.
3
            Fair enough. Do you -- you don't recall
  that testimony previously in this case? It's okay if
5
6 you don't. Just yes or no.
7
            Ma'am, I don't recall the -- I'll just say I
  don't recall.
9
       Q. Okay. And are you currently the director of
10 any entity?
11
       Α.
            I am not.
12
       Ο.
            You're not of any entity?
13
            To the best of my knowledge, no.
       Α.
14
            Okay. What is Bunker Studios?
       Ο.
15
            Ma'am, it's -- I can't talk about Bunker
       Α.
            It's -- it's connected with Genostim
16 Studios.
17 Performance Labs.
18
                  (Exhibit 6 marked.)
19
            I'm showing you what's been marked as
       Ο.
20 Exhibit 6. You filed a certificate of formation in
21 2017 for Bunker Studios, didn't you?
22
                 MS. LEWIS: Objection, form.
23
             I believe Drew Siegel did.
            Okay. Well, if you turn to the last page,
24
25 it has your signature on the document, says it was
```

```
executed by you. You see that?
2
       Α.
             I see the signature.
3
            Is -- your testimony is, that's not your
        Ο.
4 signature?
            No, ma'am.
5
       Α.
6
       Ο.
            That's not your signature?
7
            No, ma'am.
       Α.
8
       Ο.
            Whose signature is it?
9
       Α.
            I can't tell you.
            You don't know who registered an entity in
10
11 Bunker Studios, Inc., for Lauriston Crockett, III, in
12 2017?
13
       Α.
            I would say that you'd probably have to
14 refer back to the attorney.
15
       Ο.
            Do you remember previously testifying that
16 you set up this business?
17
            No, ma'am, I do not.
       Α.
18
            So just to be clear, are you concerned that
       Q.
19 there's a government document that's been filed with a
20 fraudulent signature that's representing themselves to
21 be you?
22
                  MS. LEWIS: Objection, form.
23
            No, I'm -- no. No, I'm not.
       Α.
24
        Ο.
            You're not concerned about it?
25
       Α.
            No, not at this time.
```

Okay. So if I were to reach out to the 1 Q. 2 Secretary of State today and indicate that there's a 3 fraud on this entity filing, would that concern you? No, ma'am. Α. 5 Okay. Do you recall in the hearing in 2018 Ο. 6 indicating that you were the director of numerous 7 entities? 8 No, ma'am, I do not. 9 Do you have a copy of all the transcripts in Q. 10 this case, Mr. Crockett? 11 I can't -- I can say, no, I don't believe I 12 do. 13 Q. Have you -- did you review any transcripts 14 in coming into this deposition today? 15 No, ma'am, I did not. Α. 16 Ο. Fair to say you don't recall what you 17 testified to in 2017 and 2018? 18 Α. Ma'am, how can a question like that be 19 answered? 20 Q. It could be answered yes or no, 21 Mr. Crockett. Then I would say, no, I do not remember all 22 Α. 23 the testimony. 24 Q. Okay. And do you recall that -- give me 25 just a second.

```
(Exhibit 3 marked.)
1
2
                  I'm showing you what's been marked as
3 Exhibit 3. Do you recall producing this document,
4 2019?
5
            Ma'am, this is a corporate document. I do
6 not have the right to talk about or discuss anything
7 on this document.
8
       0.
            Okay. Mr. Crockett, do you recall that you
9 produced this document to my office in 2019?
10
       Α.
            Ma'am, I would have to have my CPA here to
11 actually go through this document to see if this is a
12 true and correct copy.
13
       Q. So your testimony is, you don't recall the
14 Court ordering you to produce this document in 2019?
15
            No, ma'am, I -- I don't actually remember
       Α.
16 that.
17
            Okay. Do you remember a hearing where Drew
       Ο.
18 Siegel appeared, and I believe a Ramon, on your behalf
19 representing the entities?
20
       Α.
            Ramon?
21
            I believe his name is Ramon. Could be
       0.
22 wrong.
23
            Attorney Ray Rodriguez?
       Α.
24
       0.
           Potentially.
25
       Α.
            Raymond Rodriguez.
```

1 Q. Okay. 2 Α. Yes. 3 Do you recall a hearing where Raymond 4 Rodriguez and Drew Siegel appeared on behalf of the entities? 5 6 A. Ma'am, you're talking about a corporate entity. I don't believe I was involved in that. 8 Ο. Okay. Well, Mr. Crockett, my question to you is, do you recall being present at that hearing? 10 Α. No, ma'am, I do not. 11 Do you recall the Court ordering that the 12 entity turn over these documents? 13 MS. LEWIS: Objection, form. 14 No, ma'am, I don't recall. Α. 15 Do you recall the Court ordering that L IV Ο. 16 Performance turn over these documents? 17 MS. LEWIS: Objection, form. 18 No, ma'am, I don't recall. Α. 19 Okay. And if we look through this document 0. 20 here, the tax return for L IV Performance, it 21 indicates that it does online sales for peptides; is 22 that right? 23 MS. LEWIS: Objection, form. 24 Ma'am, I can't talk about anything having to 25 do with the corporation.

```
1
            Okay. You're refusing to tell the Court
       Q.
  what this entity does?
3
                 MS. LEWIS: Objection, form.
4
       Q.
            Is that a yes?
            I'm going to refer back to my last answer.
5
       Α.
                 MS. HAYES: Objection, nonresponsive.
6
7
             Is that a yes? Are you refusing to tell
       Ο.
  this Court what this entity does?
9
                 MS. LEWIS: Objection, form.
10
            Yes, ma'am.
       Α.
            Okay. And if we turn to the tax returns, it
11
12 lists you as the sole officer of L IV Performance.
13 Would you agree with me?
14
                 MS. LEWIS: What page specifically are
15 you talking about?
16
                 MS. HAYES:
                              There's no page numbers on
17 it, but it's got L 25-E at the top left corner.
18
                 MS. LEWIS: What page would that be?
19
                 MS. HAYES: L 25-E is at the top left
20 corner. I can count them. It's actually the 11th
21 page of that document, yeah.
22
       Α.
            So it's not the 25th page; it's the 11th
23 page?
24
            It is the 11th page of this document. And
25 on the top left corner, it says, L 25-E. The title of
```

```
the document is, Compensation of Officers, on
2 Exhibit 3.
3
                  Do you see that document?
            Yes, I do.
4
       Α.
5
            And it purports to show that you're the only
6 officer that's compensated for this L IV Performance
  in 2019; is that correct?
8
       Α.
             In 2019, yes.
            And it indicates that you own 40 percent of
9
        Q.
10
  the common stock; is that right?
11
                  MS. LEWIS: Objection, form.
12
       Ο.
            On the same page, sir.
13
       Α.
            Oh, let me go back to that one.
14
                  Yes.
            Okay. And it doesn't list where the other
15
        Ο.
  60 percent of this entity is held; is that right?
17
             I don't see it on this document.
18
            Okay. And would you agree with me that on
       Q.
  prior returns that you produced for this entity, you
20
  owned more than 40 percent of stock --
21
                  MS. LEWIS: Objection, form.
22
             -- in L IV Performance?
        Q.
23
             I can't agree with that. I haven't seen the
       Α.
24 document.
25
            Okay. Do you recall owning more than
       Ο.
```

```
1 40 percent of L IV Performance since the time this
2 litigation began?
3
             I -- I don't remember the percentages.
            Okay. Did you work for L IV Performance in
       0.
5
  2018?
6
       Α.
            Yes, ma'am.
7
            Okay. Did you work for L IV Performance in
8
  2017?
9
            Yes, ma'am.
       Α.
10
            Okay. And do you know what guideline child
11 support is?
12
       Α.
            No, ma'am.
13
        Q.
            Do you recall your dep- -- the deposition of
14 your accountant being taken?
15
                  MS. LEWIS: Objection, form.
16
       Α.
             I vaguely remember.
17
            Let me ask it a different way.
       Q.
18
                  Do you recall the deposition of Martha
19 Taylor?
20
             I vaguely remember.
21
            Okay. Martha Taylor is the -- your
       0.
22 accountant, your personal accountant; is that correct?
23
       Α.
            Yes.
24
            Okay. And at the time we took her
25 deposition, she was also the accountant for the
```

```
1 various entities in which you had an interest; is that
2 right?
3
       Α.
             Yes.
            And she discussed in her deposition how you
  would utilize the corporation to run your personal
6 bills through; is that right?
7
             I don't know.
       Α.
8
       0.
            You don't know?
9
            I don't remember her saying that at all.
       Α.
10
            Okay. In fact, she indicated that a portion
11 of your salary was paid directly to your personal
12 bills in lieu of receiving compensation physically.
13 Do you recall that testimony?
14
             I --
       Α.
15
                  MS. LEWIS: Objection, form.
16
             I do not recall that.
17
            Okay. If we turn to the last page of that
18 Exhibit 3 that I gave you, it shows on the last page
19 of the expenses -- you see that, the deductions? Do
20 you see that?
21
            The last page here?
       Α.
22
       Q.
            Yes. Yeah, that's the correct page.
23
                  Do you see where these are your
24 deductions that are listed for the entity of L IV
25 Performance for 2019?
```

```
1
       Α.
             Yes.
2
             Okay. And do you see that on legal
  professional it has $56,000? Do you see that?
4
                  MS. LEWIS: Objection, form.
5
             Legal professions?
       Α.
             Sure. About halfway down this box --
6
       Ο.
7
             Oh, yeah --
       Α.
8
       Ο.
             -- there's a line --
9
             -- legal professional.
       Α.
10
             -- legal professional, with a total of
       Ο.
11 $56,776.
            Do you see that?
12
       Α.
             Mm-hmm.
13
             And are those -- any of those fees your
        Q.
14 personal attorneys' fees that's been paid in this
15 custody case?
             Ma'am, I don't know.
16
17
             Okay. And what about down there at the
        Q.
18 very, very bottom where it says, Bunker Studio? Do
19 you see that it totals $96,644?
20
             I do.
       Α.
21
             Okay. And as the sole employee of L IV
22 Performance in 2019, can you tell me why you were
23 paying $96,644 to Bunker Studios?
24
                  MS. LEWIS: Objection, form.
25
       Α.
             No, I can't.
```

Okay. And what is Bunker Studios? 1 Q. 2 Bunker Studios is a subsidiary of Genostim Α. 3 Performance Labs, so I can't speak about it. Okay. Well, you're the -- the owner of it, 5 right? 6 Α. No. 7 You're the sole director of it? 0. 8 Α. No. 9 And were you at some point in 2019 the sole Q. 10 director of it? 11 MS. LEWIS: Objection, form. 12 Α. No. When was the last time you were the sole 13 Q. 14 director of Bunker Studios? 15 Α. Never. 16 So when you -- do you -- do you know what 17 Bunker Studios is? 18 Α. Yes. 19 Okay. Do you agree with me, it's an entity 20 that's been filed with the Secretary of State? 21 I believe so, yes. Α. And at any time since its origination in 22 Q. 23 2017, were you a director of Bunker Studios? 24 Α. Yes. 25 Okay. At what point in time were you a Q.

```
1 director of Bunker Studios?
 2
            Ma'am, I don't remember.
       Α.
 3
           Well, you've indicated you -- you remember
        0.
 4 it wasn't in 2019, right?
 5
       Α.
            Mm-hmm.
 6
       Ο.
            And you said it didn't occur ever in 2017.
 7 So help me understand, when were you a director of
  Bunker Studio?
       A. I don't remember.
9
10
                  THE WITNESS: You guys mind if I take a
11 restroom break? I didn't take one earlier.
12
                  MS. HAYES: No, we can take a short
13 break.
14
                  THE WITNESS: Thank you.
15
                  MS. HAYES: Mm-hmm.
                  THE VIDEOGRAPHER: We're off record at
16
17 11:25 a.m.
18
                  (Recess from 11:24 a.m. to 11:31 a.m.)
19
                  THE VIDEOGRAPHER: We're back on record
20 at 11:32 a.m.
21
                  MS. HAYES: Thank you.
22
                  (Exhibit 1 marked.)
23
             I'm presenting you with Exhibit 1.
                  Actually, before we move on to
24
25 Exhibit 1, how many vehicles do you own in your name,
```

```
Mr. Crockett?
1
2
       Α.
             One.
             And what vehicle is that?
3
        Ο.
             It is a 2020 Ram pickup truck.
4
       Α.
5
             Okay. And how many vehicles do you drive
       0.
6
  that are owned by Genostim?
7
       Α.
             One.
8
       Ο.
             And what vehicle is that?
             It is a 2003 H2 Hummer.
9
       Α.
10
       0.
             And is that the vehicle that's out front of
  this building today?
11
12
       Α.
             Yes, ma'am.
             And it's got a Genostim license plate?
13
       Q.
14
       Α.
             Yes, ma'am.
15
             Okay. Have you previously driven other cars
        0.
16 that contain a Genostim license plate in the last five
17 years?
18
       Α.
             Yes.
19
             Okay. What vehicles did you previously
20 drive with a Genostim license plate?
21
           A 2018 Ram truck, the 2020 Ram truck, the
       Α.
22 Hummer. To the best of my knowledge, those are the
23 only three vehicles.
24
       0.
             And at some point -- well, at what point did
25 you begin driving the Genostim Hummer?
```

```
1
       Α.
             Well, it's -- it's not my car.
                                              It's a
  company car.
3
                              Objection, nonresponsive.
                  MS. HAYES:
4
       Q.
             Just what year.
5
             I don't recall.
       Α.
             Okay. Well, how long have you been driving
6
       Ο.
  the Hummer?
8
       Α.
             I don't remember.
9
             Okay. At some point, is this the same
       Q.
10 Hummer that had your child's face on it?
11
       Α.
             Yes.
12
       Ο.
             And does it still have your child's face on
13 it?
14
             No, it does not.
       Α.
15
             When did you take that off?
       Ο.
16
       Α.
             I believe, a year ago.
17
       Q.
             Okay.
             I don't remember.
18
       Α.
19
             Okay. And why did you have a picture of
        0.
  your son on your corporate vehicle?
21
             I don't really understand the question.
       Α.
             Well, why did you put a picture of your
22
        Q.
23 child -- why did your company that you're an employee
24 of put a picture of your child on their car?
25
       Α.
             We chose to. I gave permission to.
```

Who did you give permission to? 1 Q. The Board of Directors. 2 Α. And who is that? 3 Ο. Can't give you that information, ma'am. 4 Α. 5 Because you're refusing to give that Q. 6 information? 7 I cannot. I'm only an employee. Α. 8 MS. HAYES: Okay. Objection, 9 nonresponsive. 10 Do you know the information, sir? Ma'am? 11 12 Ο. Do you know who is the Board of Directors 13 for Genostim? 14 Yes, I do. Α. 15 Okay. So you're just refusing to give that Ο. 16 information to the Court; is that right? 17 I do not have the right to give you that Α. 18 information. 19 MS. HAYES: Objection, nonresponsive. 20 Q. It's just a yes or no, Mr. Crockett. 21 Α. Yes. 22 Okay. And do you recall driving a Lexus Q. 23 GX 460 with the license plate Genostim? 24 Α. Oh, yes. Thank you. 25 Do you remember having a Corvette, an old O.

```
Corvette?
1
2
       Α.
             Yes.
3
             Do you still have that old Corvette?
        Ο.
4
       Α.
             No.
5
             What happened to it?
        Q.
             It was sold.
6
       Α.
7
        Ο.
             Did you sell it? Was it in your name?
8
       Α.
             No. It was -- it was a corporate car,
  and -- and so it was sold.
10
             But it was purchased during the period of
  time where you were the sole owner of Genostim, right?
11
12
             I don't recall.
       Α.
13
             Do you recall previously testifying to that?
        Q.
14
       Α.
             No, never.
15
             Okay. Do you recall an old Mercedes that
        Ο.
16 you would drive in this case?
17
             Yes.
       Α.
18
             Okay. And who was that owned by?
        Q.
19
             I -- it was a corporate vehicle.
        Α.
20
             Okay. And was it purchased during the
        Ο.
  period of time that you were the sole owner of
22 Genostim?
23
             I don't remember.
        Α.
             Okay. Do you recall driving vehicles with a
24
25 license plate other than Genostim in the last -- since
```

```
this litigation started?
2
       Α.
            Yes.
3
            Do you have any vehicles that have license
  plate maybe affiliated with L IV Performance?
            The 2020 Ram truck and the H2 Hummer.
5
6
       Ο.
            Both of those have Genostim or L IV
  Performance on the plate?
            Genostim. A derivative of Genostim that --
8
       Α.
9
            Okay. And anything -- is there any vehicles
       Q.
  that you've driven in the last few years that have had
11 L IV Performance or something associated with that?
12
       Α.
            No.
13
       Ο.
            So the only vehicles that you can think of
14 that you've driven in the last few years have either
15 been your personal vehicle or one that has a Genostim
16 plate; is that correct?
17
       Α.
             Yes.
18
            And the -- the picture of your son that was
       Q.
  on the Hummer, why did you decide to remove it?
20
       Α.
             It has to do with Corporate making
21 decisions, so...
22
            Okay. And do you -- do you know who made
       Q.
23 that decision to remove it from your vehicle?
24
                  MS. LEWIS: Objection, form.
25
       Α.
             Yes.
```

```
1
            Okay. And will you tell the Court who
       Q.
2 instructed you to remove your son's picture from your
3 vehicle?
            No, ma'am, I will not.
       Α.
5
            Okay. Do you know how many vehicles are
       Ο.
6 currently owned by Genostim?
7
                 MS. LEWIS: Objection, form.
8
       Α.
            Ma'am, I can't give you information about
9 corporate affairs.
10
       Ο.
          Okay. That's not what my question was,
11 so --
12
                 MS. HAYES: -- object to nonresponsive.
13
       Q. Do you know how many vehicles are owned by
14 Genostim?
15
                 MS. LEWIS: Objection, form.
16
       Α.
            Ma'am, it comes back to corporate affairs,
17 and so my --
18
                 MS. HAYES: Objection, non- --
19
           -- answer is, I'm not going to answer the
20 question.
21
                 MS. HAYES: Objection, nonresponsive.
22
       Q.
            It's just a yes or no. Do you know the
23 information about how many vehicles are owned by
24 Genostim?
25
                 MS. LEWIS: Objection, form.
```

```
1
                 MS. HAYES: What's your objection?
2
                 MS. LEWIS: Relevance.
3
            Okay. You can answer. Do you know the
       0.
  information?
4
5
       Α.
            I've -- I've already answered.
6
       Ο.
            No, sir, you haven't.
7
            Yes, I have.
       Α.
8
       Ο.
            Okay.
9
            I'm not going to talk about corporate
       Α.
10 affairs or -- or any -- any ownership or anything they
11 have. I'm a -- I'm just an employee.
12
       Q. So just for the record, you're refusing to
13 answer the question about whether you know if -- how
14 many vehicles are owned by Genostim?
15
            Ma'am, I'm going to refer back to my -- my
       Α.
16 last answer.
            It's just a yes -- Mr. Crockett, you have to
17
       0.
18 answer the question on the record. Are you refusing
19 to give this Court the information about whether you
20 know if Genostim -- well, how many vehicles Genostim
21 owns? Are you refusing to give the Court that
22 information?
23
             I don't have the right to give that, so yes.
24
            Okay. Now, looking at Exhibit 1 that I
25 handed you a few minutes ago --
```

```
Mm-hmm.
1
       Α.
           -- if we refer to this document, do you
2
3 recall agreeing to fund a trust for Lauriston
4 Crockett, IV?
5
                 Trying to find the exact page for you.
6 Do you recall?
7
       Α.
            I recall the conversation but not under the
8 guidelines presented.
       Q. Okay. Explain that response to me. What
10 do -- what do you mean, under the guidelines
11 presented?
12
       A. Well, it's very disturbing and grotesque, in
13 my opinion.
14
       O. Okay. What quidelines are you referring to,
15 sir?
16
       A. Ms. Ngo stating that if a trust is set up,
17 and that even if Lauriston has a family and he dies in
18 some nature, that she or her family would receive the
19 funds from the trust, not his children or his wife if
20 they existed at that time.
21
       Q. Okay.
22
            I never agreed upon that, and I find that
23 disturbing and grotesque.
24
                 MS. HAYES: Objection, nonresponsive
25 prior to, I never agreed upon that.
```

- A. Yes, but it is correct.
- Q. So is it fair to say that you do recall
- 3 agreeing to create a trust for your son?
 - A. Not under these guidelines.
- Q. Okay. What was your understanding of the
- 6 trust you were supposed to create for your son?
- 7 A. Ma'am, that was so long ago I don't remember
- 8 the details without...
- 9 Q. Well, you understand there's been a civil
- 10 cause of action filed in this case regarding breach of
- 11 your agreement to create that trust, right?
- 12 A. Yes.

1

- 13 Q. Okay. And so, are you telling this Court
- 14 that you don't recall what your obligations were to
- 15 fund the trust?
- 16 A. I don't remember, to tell you the truth. It
- 17 was so long ago.
- 18 Q. Okay. You would agree with me that the
- 19 point of the trust was to create some sort of benefit
- 20 for your son, right?
- 21 A. A benefit for him, yes.
- 22 Q. Okay. And do -- did you purchase life
- 23 insurance to -- for the benefit of your son as well?
- 24 A. I have life insurance.
- 25 Q. Okay. And whose -- how many policies do you

```
1 have?
2
             I have one.
       Α.
3
             Okay. And who is the beneficiary of that
        Ο.
4 policy?
5
       Α.
             Lauriston Crockett, IV, and Maxton Lee
6
  Crockett, I.
7
             Okay. And how much is that policy?
        Ο.
             250,000.
8
       Α.
9
             And when did you purchase that policy,
       Q.
10 approximately?
11
       Α.
             Ms. Hayes, I -- I -- years ago. I don't
12 remember.
13
             Okay. Well, you've indicated that Maxton is
       Q.
14 on the policy. Did you just add Maxton to the policy?
15
             Yes, ma'am, I did.
       Α.
             Okay. And you indicated he's only four and
16
17 a half weeks old, so when did you add Maxton to the
18 policy?
19
             Probably a week after he was born.
       Α.
                  MS. HAYES: I'll find it on a break.
20
21
       Q.
             Pardon?
22
             A week after he was born.
       Α.
23
             Okay. And --
       Q.
24
       Α.
             Same --
25
       Ο.
             I'm sorry. Go ahead.
```

Same time I put him on the health insurance. 1 Α. 2 Ο. Okay. And do -- who do you have health insurance through? Oh. American -- US American, I believe. 4 Α. 5 Okay. And is that through your employer? Q. 6 Α. No. 7 Is that a -- that's a private policy? 0. 8 Α. Yes. 9 Are you a 1099 employee with Genostim? Q. 10 Α. Ma'am, I -- I don't know exactly how 11 Martha's got things set up, to tell you the truth. 12 Ο. Okay. Well, do you receive a W-2 or a 1099 13 from your employer every year? 14 Again, have to ask Martha. I don't recall. Α. 15 Okay. Do you receive tax documents from Ο. 16 your employer every year? 17 Yes, I do. Α. 18 Have you filed your taxes for 2020? Q. 19 I -- I believe so, without referring back to Α. 20 Martha. I'd have to talk to her. 21 Do you think you've filed --0. 22 I believe that --Α. 23 -- your taxes for 2021? Q. Well, I believe we are, because I owe the 24 25 IRS over \$30,000 in back taxes.

For what year do you owe the IRS? 1 Q. 2 Ma'am, again, without the documentation and Α. 3 speaking to Martha, I wasn't -- I'm not prepared to 4 give an answer because I don't -- I don't know. 5 Okay. Well, you understand that the court 6 order requires you to supplement your income 7 information in this case, right? 8 Α. Ms. Hayes, I can assure you that if you requested that, that it would have been taken care of. 10 I was not aware of that. 11 MS. HAYES: Objection, nonresponsive. 12 Ο. Do you have a copy of your 2020 return 13 and 2021 -- excuse me -- 2020 and 2021 tax return 14 available to you? 15 I'm sure I can get it upon request. 16 Ο. Okay. And can you request that and get that 17 to your attorney? 18 Α. If she requests it from me, I'm sure that I 19 can. 20 Ο. Okay. And can you also include with that 21 any tax reporting documents that you have like a W-2 22 or a 1099? 23 Ma'am, if my attorney requests it, then I'll 24 turn over any documents that she requests.

Okay. Sir, you understand there's an

25

Ο.

```
1 outstanding court order in this case requiring you to
  turn over these documents already?
3
       Α.
            No, ma'am.
            Do you recall that?
4
       Ο.
5
            No, ma'am.
       Α.
6
            Do you remember the Court compelling you and
  sanctioning you for not turning over income-reporting
8
  documents?
9
       A. No, ma'am, I don't remember that.
10
                 MS. HAYES: I know what the problem is.
11 Can we go off the record for one second?
12
                 THE VIDEOGRAPHER: We're off record at
13 11:46 a.m.
14
                 (Discussion off the record.)
15
                 THE VIDEOGRAPHER: We're back on record
16 at 11:46 a.m.
17
       Q. Okay. Do you recall how much you -- and you
18 don't have to. I'll bring you the document this
19 afternoon. But do you recall how much you were
20 ordered in a life insurance policy to maintain for the
21 benefit of your son?
22
       A. I was ordered?
23
       Q.
            Correct.
            I don't ever remember being ordered to have
24
25 any life insurance. I remember what Judge Lopez said.
```

```
1 There was no order. Matter of fact, he said he did
2 not have the right to order me to do any --
3
                  MS. HAYES: Objection, nonresponsive.
             -- any insurance at all.
4
       Α.
5
                  MS. HAYES: Objection, nonresponsive.
6
       Ο.
             Do you remember how we agreed, when I lodged
  an objection, that you would stop talking?
8
       Α.
            Yes, ma'am.
9
            Okay. What current monthly expenses do you
       Q.
10 have?
11
            House payment, car payment, child support,
12 insurance, electric, water, Internet.
13
            Do you pay your own mortgage payment?
       Q.
14
            Ma'am, my house is leased. And because
       Α.
  corporation is involved, I'm not willing to make a
15
16 comment on that.
17
                  MS. HAYES: Objection, nonresponsive.
18
            Sir, you just testified to this Court
       Q.
19 earlier today that you purchased the house on
20 Wakefield, and we saw the loan application. Do you
21 remember that?
22
            Mm-hmm.
       Α.
23
            Now you're telling the Court that it's
       Q.
24 leased?
25
       Α.
            Yes.
```

1 Okay. And so do you make a mortgage payment Q. to your mortgage provider? 3 Α. Yes. Okay. How much is the mortgage payment that Ο. you make to your mortgage provider? 5 6 Α. Approximately 2,300. 7 Okay. And that's exactly what the rent was Ο. at your old house, wasn't it? 9 Α. No. 10 0. It's not. Okay. So if we look back on that 11 application right there in front of you, you told --12 on the loan application, you indicated that your rent 13 payment was \$2,300. Do you remember that? 14 Α. At the end of the lease, yes. 15 Okay. And so does your mortgage payment get Ο. 16 paid from your personal bank account? 17 Α. No. 18 Where is your personal bank account; where Q. 19 do you hold the account? 20 Frost Bank. Α. 21 And how long has it been with Frost Bank? Ο. 22 Α. Maybe five or six years. 23 Okay. And how many personal bank accounts Q. 24 do you -- do you hold an interest in? 25 Α. One.

1 And is that a checking or a savings account? Q. 2 Well, excuse me. Α. Two. Okay. And is that a checking and a savings? 3 Ο. It is a savings and a checking account. 4 Α. 5 Okay. And you have not produced any statements in this case since 2018 for your personal bank accounts; isn't that true? I can't -- I don't know. 8 Α. 9 Okay. Well, do you have access to your Q. 10 personal bank account statements? 11 Α. Yes. 12 Ο. Okay. And can you obtain the statements 13 from that account from 2018 forward and produce those 14 to your lawyer? From what dates? 15 Α. 16 Ο. 2018. Say January 1st of 2018 forward and 17 produce those to your lawyer? 18 Α. Ma'am, if my attorney asks me to do, yes. Okay. And you understand the Court has 19 Ο. already ordered you to do this, right, Mr. Crockett? 21 Α. No, ma'am. 22 Okay. And if I look at your personal bank Q. 23 statements, we won't see that a mortgage payment is 24 being made; is that right? 25 Α. Mortgage payment is being made.

1 Is it being made from your personal bank Q. account? 3 Α. No. How will I see it on your personal bank statements if it's not being made from your personal 6 bank account? 7 MS. LEWIS: Objection, form. 8 Ο. You just indicated to the Court that the bank statements, when you turn them over, will show 10 that you're making a mortgage payment; is that right? No, ma'am. You asked me what expenses I 11 12 had. I answered the question. 13 Q. Okay. Specifically, Mr. Crockett, I just 14 asked you, if we look at your personal bank 15 statements, are we going to see that a mortgage 16 payment is paid from that account? 17 You didn't say personally. You asked me Α. 18 what my expenses were. 19 MS. HAYES: Objection, nonresponsive. 20 Let's make it real clear for the Court. 0. 21 If I look at your personal bank 22 statements, am I going to see that your mortgage 23 payment is being made from that account? 24 From my personal account? 25 Ο. Correct.

1 Α. No. 2 Ο. Okay. Who pays your mortgage payment? 3 Α. A lessee. A lessee? 4 Ο. 5 Α. Mm-hmm. 6 Ο. And you have a lease on your home currently? 7 Yes. Α. 8 Ο. And who do you have a lease with on your 9 home? 10 Α. Ma'am, the corporation is involved, so I 11 can't give that answer. 12 You have a lease contract with the Ο. 13 corporation for your home? 14 For using the home for officing, shipping, Α. 15 whatever other things they have, yeah. Q. Do you -- are you aware of whether or not 16 17 there's a restriction on your mortgage about whether 18 or not you can sublet your home without the consent of 19 the lienholder? 20 Α. No, ma'am. 21 MS. LEWIS: Objection, form. 22 So it's your testimony, though, that a Q. 23 lessee pay -- pays your mortgage for you, because you 24 don't pay it, right? 25 Α. Yes.

```
1
            Okay. And do they also pay your utilities
       Q.
  for you?
3
       Α.
            Yes.
            And do they pay your car payment for you?
       Ο.
5
       Α.
            Yes.
6
       Ο.
            Okay. And who do you have a lease agreement
7 with?
            Genostim Performance Labs.
8
       Α.
9
            And when did you enter into a lease
       Q.
10 agreement with Genostim Performance Labs for your
11 Wakefield home?
             I don't correct -- I don't remember the
12
       Α.
13 date.
14
            Was it within the last two years?
       Ο.
15
            Yes.
       Α.
             Is Genostim Performance Lab aware of the
16
17 fact that your girlfriend is now residing in that
18 home?
19
       A. Residing --
20
                  MS. LEWIS: Objection, form.
21
       Ο.
             Is Genostim Performance Lab aware that your
22 girlfriend is residing in the Wakefield home that they
23 are leasing?
24
                  MS. LEWIS: Objection, form.
25
       Α.
            Ma'am, with the corporation involved, I'm
```

```
1 not going to make a comment.
2
             Have you alerted Genostim Performance Lab
       Ο.
  that your girlfriend is living in the home?
       Α.
             Yes.
5
             Okay. And have you updated your lease with
        Ο.
  Genostim Performance Lab to ensure that they -- that
  that is reflected in your lease agreement with them?
8
       Α.
             No.
9
             Are you a member of a country club?
       Q.
10
       Α.
             Am I a member of a country club?
11
             That's correct.
       Ο.
12
       Α.
             Yes.
13
       Q.
             Okay. And what -- where are you a member of
14 a country club?
15
             Prestonwood Country Club.
       Α.
16
             Do you personally make the payment to
17 Countrywood -- to Prestonwood Country Club?
18
       Α.
             No, I do not.
19
             Does Genostim make that payment for your
        0.
20
  membership?
21
             Yes, because it's in their behalf.
       Α.
22
             Okay. So is the country club membership in
       Q.
23 your name or the name of an entity?
24
             I believe it's in both, to the best of my
25 knowledge.
```

```
So it's your understanding that there are
1
       Q.
  two separate memberships at Prestonwood Country Club,
3 one for you and one for an entity?
            No, ma'am. That's not what I said.
5
            Okay. Well, are you a member, you
  personally, Lauriston Crockett, a member at
  Prestonwood Country Club?
8
       Α.
            I believe, to the best of my knowledge...
9
                  Ma'am, I'm going to have to refer back
10 to -- is my name on the lease? Yes. I mean on the
11 country club?
                 Yes.
12
                  As far as anything having to do with
  Genostim, I'm not going to comment.
13
14
       Ο.
            Well, you don't pay for it, right?
15
       Α.
            No.
                  MS. LEWIS: Objection, form.
16
17
            Do you have an employment contract with
       Q.
18
  Genostim?
19
       Α.
             Yes.
20
       Ο.
            Okay. And when was that employment contract
21
  entered into?
22
             I don't remember the date.
       Α.
23
            Was it in the last three years?
       Q.
            I don't remember the date.
24
       Α.
25
            Okay. Can you produce that employment
       Ο.
```

```
contract to your attorney?
2
             If she requests it, yes.
3
            You understand again, Mr. Crockett, all of
       0.
4 these documents have already been compelled by the
  Court. You understand that?
5
6
       Α.
            No, ma'am, I do not.
7
       Ο.
            Okay. How many attorneys have you had in
  this case, seven or eight?
9
       Α.
            No.
10
       Ο.
            That's not true? How many do you think
11 you've had?
12
       Α.
            Are you talking about the case starting from
13 2015?
14
            That's -- I'm -- since 2017 when you filed
       0.
15 your modification, how many attorneys have you had
16 represent you?
17
            I believe, five.
       Α.
18
            Okay. Who are they?
       Q.
19
            Randy Essenburg, Mary McKnight, Tom McElyea.
       Α.
20 Julie Johnson second -- sat in as a second, and then
21 Brian.
            Those are the only five you remember?
22
       Q.
23
             Sitting here right now, yes.
       Α.
24
            Okay. How much have you paid in this case
25 in attorneys' fees since 2017?
```

```
1
                  MS. LEWIS: Objection, form.
             I don't know.
2
       Α.
3
            You have no idea how much you've paid in
        Ο.
  legal fees towards this custody case --
5
       Α.
             I --
6
       Ο.
            -- since 2017?
7
       Α.
            I don't.
8
                  MS. LEWIS: Objection, form.
9
                              What's your objection?
                  MS. HAYES:
10
                  MS. LEWIS: Pardon me?
11
                  MS. HAYES: Watts your objection?
12
                  MS. LEWIS: Relevance.
13
                  MS. HAYES: He's asking for attorneys'
14 fees. I get to ask about it.
            I don't have that information in front me.
15
       Α.
            Okay. Well, is it a hundred thousand
16
        Ο.
17 dollars, or is it more or less?
18
       Α.
            I'm not going to speculate.
19
            Okay. Well, you understand that you filed a
        0.
  claim for attorneys' fees in this case, right?
       Α.
21
            Yes, ma'am.
22
            And you're asking the Court to award you
       Q.
23 attorneys' fees --
24
       Α.
            Mm-hmm.
25
       Q. -- right?
```

1 Α. Mm-hmm. So I'm asking you, what does that number 2 3 look like? How much money have you paid? I would have to refer back to my attorneys. 5 I don't have those numbers. I don't remember the 6 numbers, and I don't have them in front of me. I'm 7 not going to speculate. 8 Q. Well, how much of a retainer did you give Mr. Bagley? 10 Α. \$5,000. How much of a retainer did you give 11 12 Ms. McKnight? 13 Α. 25,000. How much of a retainer did you give 14 0. Mr. McElyea? 15 16 Α. 5,000, I believe. 17 Okay. And what about Theresa Creevy; do you 18 remember her? 19 Yes. She was second chair. Α. 20 And who was she a second chair to? 0. 21 She was going to be second chair to Brian. Α. 22 Q. Did you pay her a retainer? 23 You know, I don't -- she only worked on Α. 24 this case for such a short period of time, I don't 25 remember. I'll have to go and check my records. I

```
1 believe so, but I don't remember the amount.
2
       Q. Okay. When you paid Mr. Bagley his
3 retainer, did you pay it by -- from your bank account
4 or by credit card?
5
       Α.
            I believe -- I don't remember.
6
       Ο.
            Okay. Well, did you pay your attorneys'
7 fees to Mr. Bagley, or did some entity pay it for you?
8
       Α.
            No, I did.
9
            Okay. And did you pay your attorneys' fees
       Q.
10 to Ms. McKnight, or did an entity do it?
11
            No, I did. I believe it's through credit
12 cards.
13
       Q.
            Okay.
14
       Α.
            To the best of my knowledge. I don't
15 remember.
            That's fair. And what credit cards do you
16
       0.
17 hold?
18
            American Express, Citicorp, Discover,
       Α.
19 SunTrust Mastercard, Chase, Home Depot, Lowe's,
20 PayPal, and Amazon.
21
       Q. Okay. And you haven't turned over any
22 statements for any credit cards since 2018; isn't that
23 true?
24
       A. Ma'am, I -- I don't know.
25
            Okay. And will you agree, assuming that you
       Q.
```

```
1 identify the court order that compels you to produce
2 those, that you will turn over all statements since
3 2018 to your lawyer for production in this case?
             If my attorney has requested it.
5
                  And my attorneys in the past, I
6
  expected them to protect me and do what the Court has
  ordered.
8
                  MS. HAYES: Objection, nonresponsive.
9
            Will you agree to produce those records from
       Q.
10 2018 forward to your current lawyer so that those can
  be produced in this case?
11
12
       Α.
            Yes.
13
       Q.
            Okay.
14
       Α.
             If she requires me to.
15
            Okay. Now, have you been able to get a copy
       0.
16 of your legal file from each of these lawyers that
17 we've discussed here today?
18
       Α.
            No.
19
            Are you aware of the court order compelling
20 you to turn over a list of 28 documents to all -- 28
  categories of documents to my office?
21
22
            No, ma'am, I am not aware of that at all.
       Α.
23
            Okay. Under your employment contract with
24 Genostim, how much does it say you're going to get
25 paid?
```

- A. This year I'll make 75,000.
- Q. But what's -- what does the contract say
- 3 that you signed?
- $4 \mid \qquad$ A. It's not a contract of a certain amount. It
- 5 has to do with percentages and profitability of the
- 6 corporation.

1

- 7 Q. Okay. So you receive a percentage based on
- 8 their success?
- 9 A. Yes.
- 10 Q. Okay. And does it include terms for them
- 11 renting your home or paying for your utilities or your
- 12 membership at the country club?
- 13 A. No.
- 14 O. So are those oral agreements that you have
- 15 with the entity?
- 16 A. I don't understand the question.
- 17 Q. Sir, you just indicated those things are not
- 18 in your employment contract. Is there a separate
- 19 contract that governs the payment of your expenses by
- 20 Genostim?
- 21 A. These aren't my expenses. These are
- 22 corporate expenses, so I can't make a comment on that.
- 23 Q. You understand that the mortgage of your
- 24 house is in your name alone, right?
- 25 A. Yes, I do.

```
Okay. And you understand that your mortgage
1
       Q.
  company likely has a restriction precluding you from
  subletting your home without their consent?
                 MS. LEWIS: Objection, form.
4
5
            I have no knowledge of that.
       Α.
6
       Ο.
            Have you done any investigation into that?
7
            I have no knowledge of that.
       Α.
8
       Ο.
            Who is the lienholder on your house?
9
            Oh, it just switched. I don't remember the
       Α.
10 name of it.
11
          Okay. I'm going to leave a blank in the
       0.
12 deposition. Can you go back and look and provide the
13 name of your current lienholder on your house?
14
       Α.
            Yes.
15
                  (Request for Information to be filled
16 in on the Changes and Signature page at the end.)
17
            And just so I'm clear, Genostim made --
       0.
18 make -- pays that payment directly to this lienholder;
19 is that right?
20
            It has to do with corporate affairs, ma'am.
21 I'm not going to answer the question.
22
       Q.
            Okay. Well, does it come through you, and
23 you send the payment?
24
       Α.
            It doesn't come through my personal bank
25 account.
```

```
Okay. Do they send you a physical check
1
       Q.
2 which you forward on to your mortgage provider?
3
            Ma'am, I'm not going to talk about
4 corporate.
5
       Q. Mr. Crockett, I'm not asking you about
6 corporate. I'm asking you about you.
7
                  Do you get a physical check from
8 Genostim in the mail for -- which you forward to your
9 mortgage company?
10
       Α.
            No.
11
            Okay. Who's the lawyer for Genostim; do you
       Q.
12 know?
13
            Yes.
       Α.
14
            Is that Drew Siegel?
       O.
15
       Α.
            Yes.
16
       Ο.
            So your personal civil lawyer is the same
17 lawyer that Genostim uses?
18
            Along with Raymond Rodriguez.
       Α.
19
            Okay. How frequently do you get paid by
       0.
20
  Genostim?
21
            How frequently?
       Α.
            Correct. Do you get paid once a month, once
22
       Q.
23 every other week; what's your pay cycle?
24
            I believe it's once a month.
       Α.
25
            You're not aware of when you get a deposit
       Q.
```

```
into your account?
2
             I -- my CPA handles all of that.
3
            But it'll be reflected on your bank -- do
        Ο.
  you get a direct deposit from your company?
5
       Α.
            No.
6
            How do you get paid from Genostim?
7
             I'll have to rely back to my CPA. She
       Α.
  handles all my financial affairs.
            Mr. Crockett, you don't need a CPA to tell
9
       Q.
10 you how you get paid.
11
                  Do you get a deposit into your account?
12
                  MS. LEWIS: Objection, form.
13
       Α.
            No.
14
            Okay. Then how does money get from you --
       Ο.
  from Genostim to your wallet?
15
             The CPA handles all this.
16
17
            You don't know how money gets into your own
       Q.
18 wallet?
19
                  MS. LEWIS: Objection, form.
20
       Α.
            Yes, ma'am. A small for -- amount is put
21 into my personal account.
22
            Okay. So when we look at your bank
       Q.
23 statements that you're going to produce, it's going to
24 show less than your salaried amount goes into your
25 personal account?
```

```
1
       Α.
            Yes.
2
            Okay. And do you plan -- do you put your
3 money in some other account, the remainder of your
4 funds?
5
                 MS. LEWIS: Objection, form.
6
                 MS. HAYES: That was a bad question,
7 yeah.
       Ο.
            The remainder of your salary, other than the
  amount -- the small amount that goes in your personal
10 account, where does that go?
11
            Small amounts go into a savings account.
12
       Ο.
            And is that the savings account also held at
13 Frost?
14
       Α.
            Yes.
15
            How many outstanding loans do you have
       Ο.
16 currently other than your mortgage?
17
            Credit card debt?
       Α.
18
            No. I'm sorry. That's -- that's fair. Not
       Q.
19 lines of credit or credit cards and not your mortgage
20 company. Do you have any other loans outstanding to
21 any entity or any person?
22
            Other than -- because you --
       Α.
23
            Sure. Other than your credit cards that
24 you've put on the record and your mortgage for your
25 house --
```

Mm-hmm. 1 Α. 2 -- do you have any other loans that you -that -- that you're paying back currently to any other 4 person? Yes. Credit Union of Texas. 5 Α. 6 Ο. Okay. Anybody else? 7 Α. Yes. 8 Ο. And who is that? 9 Genostim Performance Labs. Α. 10 Ο. Okay. Anybody else? 11 No. Α. 12 Ο. How much do you owe Genostim Performance 13 Labs? I don't have that information in front of 14 Α. 15 me. Are you still currently taking ongoing loans 16 Ο. 17 from Genostim Performance Labs? 18 Α. No. 19 Okay. You understand Ms. Taylor testified that you would take a monthly loan draw from Genostim 21 Performance Labs in her deposition, right? 22 I don't remember. Α. 23 MS. LEWIS: Objection, form. 24 Ο. You don't remember? No. That was what, five years ago? I don't 25 Α.

```
1 recall.
2
            When did you last take a loan from Genostim
       Ο.
3 Performance Lab?
             I don't have that information in front of
5
  me.
                  And did you ask me if I'm still able to
6
  get loans from Genostim Performance Labs?
8
                  MS. HAYES: Objection, nonresponsive.
             I'm -- I'm --
9
       Α.
            My question is -- is, when did you last take
10
11 a loan from Genostim Performance Labs?
12
             I don't have that information in front of
       Α.
13 me.
14
            Was it in the last 12 months?
       Ο.
15
            Yes.
       Α.
             In the last 12 months, have you made any
16
17 payments from your personal account to Genostim
18 Performance Labs for repayment on those loans?
19
       Α.
            Yes.
20
            How much -- do you pay it on a consistent
21 basis?
22
            Ma'am, I don't have that information, so I
       Α.
23 couldn't tell you. I'd have to refer back to the CPA.
24
       Q. Well, what are the terms of your loan
25 agreement? Do you have to make a payment every month?
```

1 Α. Yes. 2 Okay. And how much do you pay every month? Ο. It's different percentages. 3 Α. So a percentage of repayment is taken from 4 0. your account by Genostim; is that right? 5 6 Α. Yes. 7 And who decides what amount that is to be 8 sent? That would be the Board and the CPA. 9 Α. 10 Okay. But I mean for you personally. Do 11 they -- do they send you a bill every month telling 12 you how much you need to pay them? Ma'am, we're talking about corporate 13 Α. 14 affairs. I -- I'm not going to answer that. 15 0. No, we're not, Mr. Crockett. I'm talking 16 about you. Do you get -- how do you get notification 17 of how much you are supposed to pay? 18 Α. Through the CPA. 19 Okay. Ms. Taylor contacts you and tells you Ο. 20 how much you need to pay? 21 Α. Yes. 22 Okay. And how does she contact you, by Q. 23 phone or by written correspondence? 24 Α. By phone. 25 Okay. And do you have a list of all the Q.

```
1 payments that you've made to Genostim Performance Labs
  from your personal account?
3
            Do I have a list?
       Α.
            Sure. Is it like --
 4
        Ο.
5
            Yes, yes, it's documented.
       Α.
6
        Ο.
            You had Mr. Siegel draft a document stating
  that you were considering personal bankruptcy. Do you
8
  remember that?
9
       Α.
            Yes.
10
            Okay. And what year was that?
11
            Within the last year and a half, I -- I --
12
  to the best of my knowledge.
13
        Q.
            You think a year and a half ago, you were
  contemplating personal bankruptcy?
15
            I don't remember.
       Α.
16
        Ο.
            Well, you tell me. When was the last time
17 you contemplated personal bankruptcy?
18
             I'm filing bankruptcy at this time.
       Α.
19
            You're currently in the process of filing
20
  bankruptcy?
21
            Yes, ma'am.
       Α.
22
            Okay. And have you filed a petition for
        Q.
23 bankruptcy, for dissolution, currently? Or what have
24 you filed? Let me ask that.
25
       Α.
            Attorney Holly Berguler (phonetic) is --
```

```
is -- or Berger is the attorney.
2
       0.
             Okay. Holly -- can you spell the last name?
3
             I have to get it off my phone.
                  Let me just find it up here. I have it
  here. After a million baby pictures.
5
6
                  Please bear with me.
7
             Okay. Well, I'm not going to waste time.
       0.
  I'm going to leave a blank in the deposition, and you
  can come back and fill in her information, okay?
10
       Α.
             Yes.
11
                  (Request for Information to be filled
12 in on the Changes and Signature page at the end.)
            Okay. But who does Holly work for; does she
13
       Q.
14 work for Drew?
15
       Α.
             No.
16
       Ο.
             Is she at a separate law firm?
17
             Solo.
       Α.
18
       Q.
             She's a solo?
19
       Α.
             Mm-hmm.
20
       Q.
             Is that a yes?
21
       Α.
             Yes.
22
             And is that in Dallas or Plano?
       Q.
23
             That is in Dallas.
       Α.
24
             Okay. And you've hired her, already paid
25 her to file bankruptcy on your behalf?
```

```
1
       Α.
            Yes.
2
                  Law Office of Holly Guelich,
3 G-U-E-L-I-C-H.
            Okay. And how much did you pay her to file
       Ο.
  for bankruptcy?
5
6
       Α.
             $1,000.
7
            And when did you pay that?
       Ο.
8
       Α.
            Four months ago, five months ago. I don't
  recall.
9
            Okay. And what -- have you listed any -- is
10
       Ο.
11 Genostim a creditor in your bankruptcy?
12
       Α.
             In my personal bankruptcy?
13
       Q.
            Correct.
14
       Α.
            Yes.
15
            Is there anybody involved in this
       Ο.
16 litigation, this custody case, that's a creditor in
17 your bankruptcy?
18
       Α.
            I'm -- I'm sorry. I don't understand the
19 question.
            All right, fair enough. Do you -- do you
20
       0.
21 know if Holly has already filed on your behalf?
22
            She has acquired all the information, and I
       Α.
23 believe she's filing in the next week. I have a
24 conference with her this week to be caught up on
25 everything.
```

```
1
            Do -- are you aware that a potential
       Q.
2 bankruptcy could stay this litigation from proceeding
3 to trial?
            No, I had no knowledge of that.
       Α.
5
            Okay. Now, when this case started in
       0.
6 2017 --
7
            Ma'am, can -- can we stop? I -- I need to
       Α.
8 use the restroom. I've been drinking too much water.
9 Can we take a quick break for me to use the restroom?
            Just so I'm clear, you continue to look at
10
       Ο.
11 your phone during the course of this deposition --
12
       Α.
            I -- I picked up Holly's name on here. I
13 can show you what I was looking at.
14
       Ο.
            I understand, Mr. Crockett, if you'll just
15 allow me to put my sentence on the record.
16
       Α.
            Sure.
17
            You understand that you're not allowed to
       Ο.
18 communicate during the course of this deposition,
19 right?
20
       Α.
            Yes.
21
            Okay. And we can't take breaks for the sole
       0.
22 purpose of you contacting someone else. You
23 understand that?
24
       Α.
            Yes.
25
            Okay. And so it's your testimony that you
       O.
```

```
1 need to take a two-minute break to use the restroom?
          Yes, ma'am. I'll leave the phone right
2
       Α.
3 here.
       Q. Okay.
5
                 MS. HAYES: I have no problem going off
6 the record for two minutes.
7
                 THE WITNESS: Okay. Thank you.
8
                 THE VIDEOGRAPHER: We're off record at
9 12:12 p.m.
10
                 (Recess from 12:11 p.m. to 12:15 p.m.)
11
                 THE VIDEOGRAPHER: Back on record at
12 12:15 p.m.
       Q. Okay. Mr. Crockett, in 20, let's say, 7 --
13
14 excuse me -- 2018, Vickie Alexander was appointed as
15 the amicus attorney; is that right?
16
       Α.
          I -- I don't know the date, but I know
17 she --
18
            There was --
       Q.
19
            -- was appointed.
       Α.
20
       Q.
            There was an amicus attorney appointed prior
21 to her as well; is that correct?
22
            Mr. Cobb.
       Α.
23
            And actually one -- one additional; is that
       Q.
24 correct?
      A. Ms. Turton.
25
```

```
Correct. And so I guess Ms. Ami- -- excuse
1
       Q.
2 me -- Ms. Alexander must be the third amicus that was
3 appointed on this case. Does that sound right?
            To the best of my knowledge, yes.
5
            Okay. And she's currently being paid for by
       Ο.
6
  the court; is that correct?
7
       Α.
            Yes.
       0.
            And at that time that that court order was
  entered, it was entered as a result of both parties
10 having insufficient income; is that correct?
11
            I don't remember.
12
       Ο.
            Okay. And at the time, do you recall
13 testifying that your salary was somewhere around
14 $50,000?
            55, I believe.
15
       Α.
16
            Okay. And obviously last year it was a
17 hundred and -- almost a hundred and fifty; is that
18 right?
19
       Α.
            Yes.
20
            Okay. And it sounds like Genostim also pays
21 for your personal expenses at home and your utilities;
22 is that right?
23
            Partial.
       Α.
            Okay. Well, you indicated they -- that
24
25 brings up a point.
```

```
1
                  Does Genostim lease -- pay less for the
2 mortgage than the mortgage note? Meaning, do you have
3 to pay out of pocket any portion of your mortgage
4 payment?
5
       Α.
            Yes.
6
       Ο.
            Okay. What portion do you have to pay out
  of pocket?
8
       Α.
            It'll be taxes.
9
            Okay. I'm talking about the mortgage
       Q.
10 payment.
            Do you escrow your taxes and insurance?
11
            Only insurance, not taxes.
12
       O.
            Okay. So in your monthly mortgage payment,
13 do you have to come out of pocket at all on a monthly
14 basis to pay your mortgage payment?
15
       Α.
            No.
16
       Ο.
            Okay. So you're receiving -- you said your
17 mortgage payment, you think, is $2,300 a month?
18
       Α.
            Approximately.
19
            And then what approximately are utilities a
20 month?
21
            Well, there's -- there's a second mortgage,
       Α.
22 too, so...
23
            Does -- do you pay the second mortgage
       Q.
24 yourself?
25
            No. It's all in the lease.
       Α.
```

1 Okay. And so what is the amount of the Q. second mortgage that you have in your name? 3 Α. \$323. Okay. So approximately 2,600 and change is Ο. your mortgage payment, total? 5 6 Α. Mortgage payment, yes. 7 Okay. And then approximately how much are Ο. utilities? 9 Α. Gas is maybe \$46. Electricity is maybe 120. 10 Ο. Do you have cable and Internet? Yes. 11 Α. And how much is that bill? 12 Ο. 13 Α. \$63. 14 You pay \$63 in cable and Internet? Ο. 15 Mm-hmm. Α. Okay. Who is your provider? 16 Ο. 17 Frontier. Α. 18 Okay. And so the only utilities that you Q. 19 think are at the residence are gas, electric, and 20 cable and Internet? 21 Lawn care. Α. 22 Is the lawn care paid by you individually? Q. 23 Α. Yes. 24 Is your cell phone bill paid by you 25 individually?

```
1
       Α.
            No.
2
            How much is your cell phone bill on a
3 monthly basis?
            $136, I believe, to the best of my
5 knowledge.
6
       Q. Okay. So approximately $350 a month are
7 being paid -- utilities are being paid under this
  lease; is that right?
9
            Approximately.
       Α.
10
            Okay. And approximately another $2,600 for
11 your mortgage payment is being paid under this lease;
12 is that right?
13
       Α.
            Approximately.
14
            So you're receiving a benefit of about
15 $3,000 a month as a result of the lease?
            Benefits?
16
       Α.
17
            Right. You're receiving a benefit. You're
       Q.
18 not having to pay that, right?
19
       Α.
            No.
20
            Okay. No, that's not correct or...
21
            No, you asked me a question, was I able --
       Α.
22 was I paying that; and I said no.
23
            Okay. So -- but again, $3,000 is
24 approximately the value of what you're receiving under
25 this lease -- is that correct -- on a monthly basis?
```

1 Approximately. Α. 2 Okay. And that's in addition to the Ο. \$150,000 that you were earning in 2021, right? I don't believe -- I don't understand the 5 question. 6 Ο. Okay. Well, even at \$150,000, you understand your child support currently being --8 that's been ordered is well under guidelines, right? 9 MS. LEWIS: Objection, form. No, I don't. 10 Α. 11 Do you know how much you're supposed to pay 12 for one child in the state of Texas for quideline 13 child support? 14 No, I don't. Α. 15 Okay. Do you know how much you're supposed Ο. 16 to pay for two children for guideline support in the 17 state of Texas? 18 MS. LEWIS: Objection, form. 19 No, I don't. Α. 20 Ο. You told the Court that you were unable to pay any funds directly to Ms. Alexander in your prior 22 testimony; is that right? 23 When? Α. 24 At any point in this liti- -- several times 25 throughout this litigation.

```
No, ma'am, I don't recall that at all.
1
       Α.
2
       Ο.
            Do you have the resources now to pay funds
  to Ms. Alexander?
             I -- I don't know how to answer the
5
  question.
6
       Q. Okay. Let me ask it a different way.
7
                  Other than your lawn care -- oh, let me
  back up.
8
9
                  You also have your lease payment --
10 excuse me -- your vehicle paid for by Genostim, you
11 indicated, right?
12
       Α.
            It is a -- yes.
13
            Okay. But the truck that you own in your
       Q.
14 name alone, is that also paid by Genostim?
15
            Yes. I have a -- I have an allowance for
       Α.
16 that.
17
            Okay. And what's that allowance?
       Q.
18
       Α.
            $626.
19
            Does that include your insurance for that
       Ο.
20 vehicle?
21
       Α.
            No.
22
       Q.
            Does -- do you pay insurance on that
23 vehicle?
24
       Α.
            Ma'am, I'm going to take my watch off.
25
       Q.
            Okay.
```

```
1
       Α.
            I don't want to be -- anybody saying that
2 I'm disturbing.
3
                 MS. HAYES: Objection, nonresponsive;
4 objection, sidebar.
5
            Do you pay insurance for that vehicle?
       0.
6
            No. It's used in corporate.
7
            Do you know how much the insurance is for
       Ο.
  your personal vehicle?
9
            No, I don't remember it right -- right at
       Α.
10 this moment.
11
       Ο.
            Okay. Do you have an individual policy for
12 your vehicle?
13
       Α.
            Yes.
14
            And the corporation, or some corporation --
15
            It's -- it's -- both names, I believe, are
       Α.
16 on the -- on the -- on the insurance policy.
17
            Your testimony is that Genostim and your
       0.
18 individual name are on your individual policy for
19 your --
20
            To the --
       Α.
            -- individual vehicle?
21
       Ο.
22
            To the -- to the best of my knowledge. I
       Α.
23 can't tell you the last time I looked at it.
24
            Okay. Have you ever taken your son on a
25 vacation?
```

1 Α. Lauriston? 2 Q. Correct. 3 Α. No. You clarified when I --Ο. 5 Well -- well, vacation, would you like to 6 define vacation? 7 Ο. Sure. 8 MS. HAYES: Objection, nonresponsive 9 after no. Q. You clarified when I asked you about your 10 11 son. Have you taken Maxton somewhere in the last four 12 and a half weeks on vacation? 13 I've taken him home. Α. 14 0. Is that a no? Have you taken your son 15 outside the -- your -- your new son outside the state 16 in the last four and a half weeks? No, ma'am. 17 Α. 18 Okay. Have you taken Lauriston, IV, out of Q. 19 state on vacation? 20 Α. No. 21 You understand that Lauriston has traveled Ο. 22 with his mother on various trips, right? 23 Okay. I don't know where they go. I'm not Α. 24 informed usually. 25 Q. Okay. Do you recall a cruise that your son

```
1 went on with his mother?
            I recall two, I believe.
2
       Α.
3
            Okay. And do you recall one of them, you
4 contacted the cruise's ship director and reported that
5 your son was too ill to be on the ship?
6
       Α.
            I asked them to check on him because he was
7 ill.
8
       Ο.
            Is that a yes, you remember making that
  phone call?
10
       Α.
            I do.
11
            Okay. Do you remember what year that was?
       0.
            No, I'm -- I'm afraid I don't.
12
       Α.
13
       Q. And in fact, you asked him to not allow your
14 son to travel; isn't that right?
15
       A. From the doctor's orders and the
16 pharmacist's orders, yes, I sure did.
17
                 MS. HAYES: Objection, nonresponsive
18 other than yes.
19
            Yes. Yes, ma'am, I did.
       Α.
20
                  MS. HAYES: I'm going to stop here. I
  think it's a good place before I launch into a whole
22
  'nother topic.
23
                  MS. LEWIS:
                              Okay.
24
                 THE VIDEOGRAPHER: We're off record at
25 12:24 p.m.
```

```
1
                  (Recess from 12:24 p.m. to 1:28 p.m.)
2
                 THE VIDEOGRAPHER: We're back on record
3 at 1:29 p.m.
       Q. Okay. Mr. Crockett, we've just come back
5 from lunch; and when we left off, we were talking
6 about a cruise that your son went on with his mother.
7 Do you remember that testimony?
            Yes.
8
       Α.
9
            Okay. And do you also recall that you told
       Q.
10 the cruise director that your -- that Ms. Ngo did not
11 have legal custody of your son?
12
       Α.
            I don't recall saying that.
13
       Q.
            Okay. And was the goal of your conversation
14 or your communications with the cruise director to get
15 your son to return back home?
16
       Α.
            No. It was just to -- to check on his
17 health.
18
       Ο.
            So, rather than contact his mother to check
19 on his health, you contacted the cruise director of
20 the ship?
21
       A. Well, it would have been nice to talk to his
22 mother, but she basically stole the child to go on
23 this cruise.
            Okay. How did she steal her child?
24
       Ο.
25
            Well, Lauriston was sick, and he was having
       Α.
```

```
1 spasms and would have to go to the restroom,
2 seriously, every 10 to 15 minutes. Dr. Lee, our
3 physician, said he should be at home because she was
4 putting him on a new medication; and we didn't know
5 how he would react to this medication.
6
                 So Lauriston was home and in my bed.
7 We had him tucked in and spoke to Nikki about it and
8 told her maybe she should rethink about going back on
9 another cruise because our child was sick and because
10 of the medication. We didn't know the reaction he was
11 going to have from it. Plus having to be by the
12 bathroom every 15 minutes with a spastic -- it
13 wasn't -- he was having a spasm in his urinary tract.
14
                 And Nikki said, Oh, my gosh, I agree
15 with you. Let me come over and see him.
                 And I said okay. And so she said -- so
16
17 she came over, and we were both in my bedroom; and she
18 was comforting Lauriston. And -- and she says, You
19 know, you're right. You're absolutely right.
20 see that -- that he's sick and with this medication.
21 She said, So I'm just going to take him home. We're
22 just going to stay home this weekend.
23
                 And I said, Okay, great. Let's make
24 sure we take care of him, find out what's going on.
25 Because we were supposed to go to the doctor next week
```

```
1 to check on him again.
2
                  And she said, Oh, yeah, I totally agree
3 with you. I totally agree.
                  And so we took him out to the car, I
5 put him in his car seat, and off he went. And I went
6 to check on him later on that evening with no reply.
7
                  And to the best of my knowledge, the
8 way I remember it is that she texted me when they left
9 port and told me that he was on the cruise.
10
                  Even knowing he was sick, even knowing
11 Dr. Lee giving suggestions that he does not go on a
12 cruise, even though the pharmacist is saying he could
13 have reactions to his medication, she still decided to
14 take our child on a cruise.
15
       Q.
            Okay.
16
            So as his father, I reached out to the
17 physician --
18
                  MS. HAYES: Objection, nonresponsive at
19
  this point.
20
       Ο.
            You would agree it was her period of
21 possession with the child, right?
22
       Α.
            Yes.
23
            Okay. So when you told this Court just now
24 that she stole the child, she was entitled to the
25 child under the --
```

We had --1 Α. 2 -- the prior possession order; isn't that 3 right? Kind of a gray area when both parents agree that the child should not be going out of the country 6 and he was sick. 7 MS. HAYES: Objection, nonresponsive. 8 Α. No, I am being responsive, ma'am. We had an 9 agreement --10 MS. HAYES: Objection. 11 -- and she --12 Ο. Mr. Crockett --13 Α. -- she broke the agreement and left. 14 Mr. Crockett, we've talked about this now Ο. 15 several times. I would ask that you respect the 16 Court, respect my time. Ma'am, I do respect your time, but I also --17 Α. 18 I'm here as his -- as a father talking about the 19 protection of my child and the abuse my child has 20 suffered under his mother's care. 21 Q. Mr. Crockett, I'm over here. Okay? We're 22 not putting on a performance for this camera. You can 23 speak to me, okay? 24 Α. Yes, ma'am. 25 My question to you is, how is it you're O.

```
telling this Court she took the child, she stole your
  child when it was --
            Didn't say steal. We had an agreement.
3
4 broke the agreement knowing he was sick.
5
                  MS. HAYES: Objection, nonresponsive.
6
            Just listen to my question. Isn't it true
  that you -- she didn't steal the child, because it was
  her period of possession under the court order?
9
            The question you are asking, I would have to
       Α.
10
  say yes.
11
                  MS. HAYES: Objection, nonresponsive
12 other than yes.
13
            So it's your testimony -- well, strike that.
       Q.
14
                  And so you thought you would take it
15 upon yourself to try and mess up this child's trip by
  contacting the ship's director and trying to have your
17 son taken off the ship?
18
       Α.
            That is incorrect.
19
            Do you think it would have been in your
  son's best interest to have him removed from that
21
  trip?
22
            Not after speaking with the physician.
       Α.
23
            And in fact, after that you tried to request
24 an injunction in the court to preclude Nikki from
25 taking him on any more vacations; isn't that true?
```

- I don't recall that. 1 Α. 2 Do you like that Lauriston gets to experience vacations with his mother? When he's healthy, absolutely. 4 Α. 5 Do you think it's --Ο. 6 Α. I think it's in his best interest for him to 7 be able to travel and do all these things if he's 8 healthy. Q. Okay. And are you going to decide if he's 10 healthy, or can his mother make that call as well? 11 I think the parents should be able to do 12 that, but a parent has to be competent enough to make 13 that decision. 14 Okay. Is your statement that Ms. Ngo is not Ο. 15 competent? I'm saying it's in question. 16 17 Okay. So you don't believe -- let's talk Ο. 18 about that for a second. You don't believe Ms. Ngo is competent to take care of your son? 19 20 Α. Well, ma'am, Lauriston made an outcry. 21 MS. HAYES: Objection, nonresponsive.
- Q. It's just a yes or no. Are you telling this
 Court that you don't believe Ms. Ngo is competent to
 take care of your son?
- 25 A. I believe it's in question.

1 Okay. You would agree with me, she has been Q. the sole provider --I disagree completely. 3 Well, I haven't got through my question, so you can disagree when I get to the end. 5 6 And you agree with me that since this Court entered an order in August of 2019, she has been the sole conservator for this child? 9 No, ma'am, she has not. Α. 10 Okay. And are you saying no, ma'am, because 11 you believe Rob Cottingham has assisted in that? 12 Α. I have knowledge that that's partaken even from Jennifer Frendle, who is doing the family study. 14 Ο. Is that a yes or a no, Mr. Crockett? 15 That is a yes. Α. 16 Ο. Okay. So would you agree with me then that 17 Rob and Nikki have been the sole providers for Lauriston, IV, since August of 2019? 18 19 To the best of my knowledge, yes. Α. Okay. And you would agree with me, he is 20 Ο. 21 doing good in school, right? 22 To the best of my knowledge. I wouldn't Α. 23 know because I've been cut out of all of his 24 education. 25 Q. Okay. So you don't have a Skyward account,

```
Mr. Crockett?
1
2
            Ma'am?
       Α.
3
            You don't have a Skyward account?
        Ο.
            Yes. I get information from his teachers.
5
            Okay. So when you say that you've been cut
       0.
6 out from all of his school information, you do receive
7 school information through Skyward, do you not?
8
       Α.
            Well, there's more to school other than just
9 grades, ma'am.
10
                  MS. HAYES: Objection, nonresponsive.
11
            You just told this Court that you've been
12 cut out of school information; but you receive his
13 school information on Skyward, don't you?
14
       Α.
            Yes.
15
                  Would you like me to define that for
16 you?
17
                  MS. HAYES: Objection after yes.
18 Objection, nonresponsive after yes.
19
            Have you seen your son's grades on Skyward
       0.
  in this school year?
21
            Yes. He's doing very well.
       Α.
22
        Q.
            And did you see your son's grades on Skyward
23 for last year, his fifth grade year?
24
       Α.
            Yes. He's done very well.
25
       Ο.
            Okay.
```

- A. He's a very smart boy.

 And in fact, can you s
- Q. And in fact, can you see his grades on Skyward for -- through his time in Highland Park Independent School District?
 - A. I suppose, if I go back and look, I can.
- Q. Okay. And so you also on Skyward can get access to any trouble or corrective behavior, disciplinary behaviors that have occurred for your
- 9 son; isn't that true?

5

- 10 A. Trouble, for sure.
- Q. And you would agree with me that he's stayed out of trouble and behaves in school, right?
- A. He has, but he's been bullied in school.
- 14 MS. HAYES: Objection after, He has.
- 15 Objection, nonresponsive.
- Q. And your son hasn't been disciplined in his is sixth grade school year, has he?
- 18 A. No. Only in his fifth after being bullied.
- MS. HAYES: Objection, nonresponsive as
- 20 to only in the sixth.
- Q. And you would agree with me that there was no discipline to your son after his fifth grade year?
- A. To the best of my knowledge, no.
- Q. Okay. So -- and you would agree with me
- 25 that he's growing at a healthy rate; isn't that

```
correct?
1
2
            Physically, sure.
       Α.
3
            Okay. And he appears, when you see him, to
       Ο.
4 be in good health; is that -- is that true?
5
       Α.
            Yes.
6
       Ο.
            Okay. So let me ask you this. If -- if
7 he's doing well in school --
8
       Α.
            Mm-hmm.
9
          -- and he's not getting in trouble and he
       Q.
10 appears to be healthy and he's growing appropriately,
11 are you still telling this Court that Ms. Ngo is not
12 competent to take care of him and take care of your
13 son?
14
       Α.
            Ma'am, what I told you is, it is in
15 question.
16
            Okay. And the person that has it in
       Ο.
17 question -- you question it? Is that your testimony?
18
       Α.
            I believe Jennifer Frendle's questioned it
19 also. I believe Dr. Frye will question it also. I
20 don't speak for them --
21
                 MS. HAYES: Objection --
22
            -- but I do have information from Jennifer
       Α.
23 Frendle.
24
                  MS. HAYES: Objection, nonresponsive.
25
       Α.
            Yes.
```

```
1
                  MS. HAYES: Objection, nonresponsive
2 other than yes.
            You believe it's important for Logan, or
3
4 Lauriston, IV, to be in a supportive environment in
  his life, right?
6
       Α.
            Yes.
7
            Okay. And you believe it's important for
       Ο.
8 him to be supported by all people in his life that
9 love him, right?
10
       Α.
            All people in his life.
11
            Okay. And you're aware that in 2019, the
12 Court restricted your access to your son, correct?
13
            Yes.
       Α.
14
                  (Exhibit 30 marked.)
15
            And I'm showing you what I thought was
       Ο.
16 marked -- I'm just going to mark as Exhibit 30, just
17 to be safe.
18
                  MS. HAYES: It's just the AJ.
19
  there's the second page. Sorry.
20
       Q.
            Do you recognize that?
21
            Not really, but -- (reads to self.)
       Α.
22
                  Yes, I had no legal counsel on this
23 day.
24
                  MS. HAYES: Objection, nonresponsive
25 after yes.
```

And you recall that the Court restricted 1 Q. your access to only supervised access, right? 3 Α. Yes. And the Court ordered that you could have access at either FLP or at that time Hannah's House or 6 another agreed supervisor; is that correct? 7 The beginning, it was Hannah's House. Α. 8 Ο. Okay. But the Court ordered that you could 9 use any of those three, correct? I don't recall that. I recall it was 10 Α. 11 Hannah's House. And after not seeing Lauriston for 56 12 days, they -- they gave me --13 MS. HAYES: Objection, nonresponsive 14 after --15 A. -- told me to go directly to Hannah's House 16 and I did. 17 Sir, we've had this conversation now ten 18 times. When I object, you stop speaking. Do you 19 understand? 20 I hear what you're saying. 21 Okay. Do you understand what I'm saying? 0. 22 Α. I do understand what you're saying. 23 MS. HAYES: Okay. And so I'll object 24 to nonresponsive after, I don't know. 25 Q. And I'm asking you to look at that document

```
1 right in front of you and tell me, does it list three
2 super -- three facilities in which you may have your
3 access?
            FLP, Hannah's House, or other agreeable
       Α.
5 supervisor.
6
       Ο.
            Okay. And so your choice, based on those
7 three, was Hannah's House; is that right?
8
       Α.
            If I call -- recall correctly, Judge Moore
9 gave us a direction into Hannah's House, and we were
10 able to get into Hannah's House immediately because --
11 so that's what I recall.
       Q. Okay. Regardless of how it is, we started
12
13 access -- you started access under that order at
14 Hannah's House, right?
            Yes, we did.
15
       Α.
            Okay. And those visits were occurring at
16
17 the country club; is that right?
18
       Α.
            That is incorrect.
19
            Where were they occurring?
20
       Α.
            They were happening at a Lutheran church in
21 Plano, Texas.
22
            And how long did you visit your son at the
       Ο.
23 Lutheran church in Plano, Texas?
24
       Α.
            Maybe over a year.
25
       Q. Okay. And every one of those visits,
```

```
1 Hannah's House was present?
2
       Α.
            Yes.
3
            Okay. At some point did you have access to
       Ο.
4 your son supervised by Hannah's House at other
  locations?
5
6
       Α.
            Yes.
7
            What other locations did you have access to
       Ο.
  your son supervised by Hannah's House?
9
       Α.
            I believe it was a country club or also
10 parks. But it was a country club. We -- we got
11 access at the country club.
12
       Ο.
            Okay. And at some point Hannah's House was
13 removed as a supervisor; is that right?
14
       Α.
            Yes. It was quite comical, but yes.
15
                  MS. HAYES: Objection, nonresponsive
16 after yes.
17
       O. And so under that court order in front of
18 you, there were two options for access with your son;
19 is that right?
20
            FLP and other agreeable supervisors.
21
            Okay. And did you commence access at FLP
       Ο.
22 with your son at some point?
23
            Yes, until we were terminated. Suspended.
       Α.
24
            Okay. And do you recall approximately how
25 long you had access with your son at FLP before it was
```

```
1 suspended or terminated?
2
            You know, it seems like an eternity when
       Α.
3 you're in a situation like that, but I don't remember
4 exact times. I do know that we were suspended on
5 three different times because of alienation techniques
6 being used against -- with the child.
7
                 MS. HAYES: Objection, nonresponsive
8 after, I don't know.
       Q. Let's talk about the three suspensions at
10 FLP. Can you tell me what the first time was that you
11 were suspended from FLP?
12
       Α.
            The first time -- and if I may, ma'am, I'd
13 like to just turn my phone off. Thank you.
14
                 The first time we were suspended is,
15 Lauriston was refusing to come in. And Rob Cottingham
16 taped the staff when they were doing an interview for
17 Lauriston to come in, outside the facility, which are
18 completely against the rules which we all signed and
19
  agreed to. So we were suspended.
20
       Ο.
            Okay. And when was that; do you remember?
            I do not recall the date.
21
       Α.
22
            Do you recall sending a letter to Rob
       Q.
23 regarding issues at FLP?
            You know, I don't recall.
24
       Α.
25
                 (Exhibit 5 marked.)
```

```
1
            I'm going to show you what's been marked as
2 Exhibit 5. Oh. Excuse me. This is regarding
3 Hannah's House.
            This is Hannah's House, ma'am.
       Α.
5
            Yeah, you're right.
       Ο.
6
                 Do you recall this letter?
7
              Rob, Hannah's House is not your
       Α.
8
                 messenger.
9
            Yes. I'm quoting them directly in this
10 email.
11
                 MS. HAYES: Objection, nonresponsive
12 other than yes.
13
            I'd like to finish reading it, if I may.
14
                 MS. HAYES: Objection, sidebar.
15
       Α.
            Make sure you're giving me a true and
16 correct copy.
17
                 MS. HAYES: Objection, sidebar.
18
       Α.
            Yes. Yes, I remember this. This is
19 Lauriston's -- my project that Lauriston -- I was
20 helping him with one of his cartoon projects, yes.
21
       Q. Just to be clear, did you just tell the
22 Court that Lauriston is your project? Is that what
23 you just testified to, sir?
            Word project? No, this is a project
24
       Α.
25 Lauriston and I were working on with one of his
```

```
cartoons.
2
            Okay. Now, just so we're clear, Hannah's
3 House was removed because of your inappropriate
4 relationship with the supervisors; isn't that true?
5
                 MS. LEWIS: Objection, form.
6
       Α.
            No, ma'am, that's not true at all.
7
             Is it true that Hannah's House was removed
       Ο.
  as a supervisor because of your improper contact with
  Hannah's House that violated their rules?
10
            No, ma'am, that is completely incorrect.
            Okay. Now, the second time you were
11
12 suspended from FLP, do you recall that?
13
       Α.
            Yes, I do.
14
            And why do you -- what do you recall
15 about -- what do you recall about the second time that
16 you were terminated by FLP?
            Ma'am, I wasn't the one who was terminated.
17
18 Lauriston was terminated for them, using their
19 facilities. And I don't re- -- I know exactly what
20 happened.
21
                 On three different occasions, Lauriston
22 would come to the door with me waiting inside with
23 food and other activities that we were going to do.
24 And on three different occasions -- excuse me. On six
25 different occasions.
```

```
But on the first time you're talking
1
2 about, he came to the door and said, I know how the
3 systems work, and I'm not going in today to see my
4 daddy. I'm going to go play hockey.
5
                 So the child was coached, which is an
6 alienation, which is considered family abuse.
7 again, because it happened three times in a row, we
  were suspended for a second time.
            Because your son didn't want to see you
9
       Q.
10 three times in a row, you were suspended.
11 your testimony?
12
       Α.
            No, ma'am, that is not my testimony.
            Okay. Well, because your son indicated to
13
       Q.
14 someone at the facility that he didn't want to see
15 you? Is that what your testimony is?
            No, ma'am, that is not -- not the reason
16
       Α.
17 why. I was very clear in what I said. Lauriston was
18 coached to say, I know how the system works, and I'm
19 hot coming in today because I can go play hockey.
20
                 MS. HAYES: Objection, nonresponsive
21 after no.
22
       Α.
            So hockey is used as a reward --
23
       Q.
            Again --
24
       Α.
            -- not to come in.
25
            Mr. Crockett, we're going to do this again?
       O.
```

```
We're going to tell the truth today,
1
       Α.
  Ms. Hayes.
3
            Okay. Well, let's start, Mr. Crockett.
       Ο.
4 That'd be fantastic.
5
       Α.
            Yes, ma'am.
6
       Ο.
            When --
7
                  MS. LEWIS: Objection, sidebar.
8
                 MS. HAYES: Objection, nonresponsive
9 after no.
10
       Ο.
            Isn't it true that FLP sent out a letter
11 saying, after successful attempts to facilitate visits
12 between you and your son, they can no longer schedule
13 services?
14
            Which time, ma'am? There were three.
       Α.
            The first two.
15
       Ο.
16
       Α.
            Yes.
17
            And I'm going to show you -- let me just
       Q.
18 mark it. And this is the only copy I have, for some
19 reason. I'm going to let y'all see it. I'm going to
20 mark it as Exhibit 31. Oh, excuse me. I'm going to
21 withdraw that. I'm going to mark it as Exhibit 15.
22
                  (Exhibit 15 marked.)
23
            There you go.
       Q.
24
                  MS. HAYES: There you are.
25
            In fact, what FLP said was:
       Ο.
```

After a series of unsuccessful attempts 1 to facilitate visits between 2 Mr. Crockett and Lauriston Crockett, FLP 3 regrets that we can no longer schedule 4 5 services for your family. Due to the 6 continued child's refusal, it appears as 7 though FLP is not an environment in 8 which the current issues presenting in 9 your case can adequately be addressed. 10 Says it all right there. Α. Okay. And it's very clear that it's the 11 12 child's refusal to see you that's the problem; isn't 13 that true? 14 Well, ma'am, if you go back into the 15 records, you'll find out that Lauriston was being 16 coached to say --17 MS. HAYES: Objection, nonresponsive 18 after -- no. Objection, nonresponsive. 19 It's just a yes or no. Your child refused 20 to see you at the facility and they cancelled 21 services, right? 22 A. After being rewarded to go to hockey, yes. 23 MS. HAYES: Objection, nonresponsive 24 other than yes. 25 Q. And so what you're trying to tell this Court

```
1 is that you believe there's some alienation involved
2 in this or some sort of coaching; is that right?
3
       Α.
            I'm not telling it. I'm quoting as a state
4 fact.
5
                  MS. HAYES: Objection, nonresponsive.
6
       Α.
            Yes.
7
            Just a yes or no. Is that what you're
       0.
  trying to tell this Court, is that you believe your
  child has been coached?
10
       Α.
            Yes.
11
            Okay. And you're laughing, Mr. Crockett.
       0.
12 Can you tell the Court --
13
       Α.
            I'm laughing because your --
14
       Ο.
          -- why you're laughing?
15
            -- your question is so absurd. You know
  exactly what is happening.
17
                  MS. HAYES: Objection, nonresponsive.
18
            And this child has been harmed, so, yes.
       Α.
19
                  MS. HAYES: Objection --
20
       Α.
            To answer your question --
21
                  MS. HAYES: Objection --
22
            -- do I believe the child's been coached?
       Α.
23 Do I believe he's been alienated --
24
                  MS. LEWIS: Objection --
            -- and harmed? Yes.
25
       Α.
```

```
1
                  MS. LEWIS: -- nonresponsive.
2
                  THE WITNESS: Ma'am?
3
                  MS. HAYES: Objection, nonresponsive;
4 objection, sidebar.
5
            Now, at some point you were able to resume
  services with FLP; isn't that right?
7
       Α.
            No.
8
       Ο.
            You weren't able to go back to FLP after
9
  that?
10
       Α.
            Not after the third time, no.
11
            Okay. But after the second time, you were
       Q.
12 able to go back at some point; is that correct?
13
       Α.
            Yes.
14
            Okay. And it finally -- just recently FLP
15 has come to the determination that your family no
16 longer applies under their charter; is that right?
17
            Recently?
       Α.
18
                  MS. LEWIS: Objection, form.
19
            Yes. Within the last 60 days.
       0.
20
       Α.
            FLP?
21
       Ο.
            Correct.
22
            No, ma'am. It's been months.
       Α.
23
            Okay. And when -- when did you understand
24 that FLP told the parties that they were no longer
25 eligible under their charter?
```

- August 17th, 2021. 1 Α. 2 Okay. And just to be clear, the letter that 3 you have in front of you, Exhibit 15, this is 4 regarding the child's refusal. 5 There was a subsequent letter from FLP 6 regarding termination based on the fact that there was 7 no family violence reported in the modification. Did you receive that information from FLP? I don't recall. 9 Α. Okay. It would have been within the last 60 10 Ο. 11 days. 12 I don't believe that I received it. 13 Okay. And so at that point the only remedy Q. 14 under that court order would have been for you-all to 15 agree on a supervisor; is that right? 16 Α. Yes. 17 Okay. And at some point somebody in this Ο. 18 case mentioned B & E. Do you recall that? 19 You know, I remember it that we could -- I Α. 20 remember it, but I never -- I never actually saw an 21 order.
- A. I'm sorry. I do not.

22

Q.

23 in this case?

Q. Okay. Have you ever been to B & E

Okay. Do you remember who recommended B & E

```
1 Visitation Center?
2
            Are you talking about the facility in Grand
3
  Prairie?
            I am. Have you ever been there?
       0.
5
       Α.
            No.
6
       Ο.
            Did you -- how did you accomplish intake
  through B & E?
            I contacted the director.
8
       Α.
            Okay. And who is the director?
9
       Q.
10
       Α.
            Anna Kaiser.
11
            And it was several months after the court
12 recommended B & E that you contacted Anna; is that
13 right?
14
            I don't believe so. I believe I contacted
       A.
15 her very quickly.
            Now, there was a court hearing in this case
16
       Ο.
17 a couple weeks ago where the Court gave you the option
18 to now utilize B & E off-site; is that right?
19
            That is correct.
       Α.
20
            Okay. And between the time that FLP
21 terminated and the time that the Court entered that
22 order last week, you did not see your son outside of
23 reunification therapy; is that right?
            That is correct.
24
       Α.
25
       0.
            Can you tell the Court why you decided not
```

```
to see your son for that one-year period of time at
2 B & E?
            After taking counseling from Dr. Linda
4 Threats, after speaking with Forrest Macfarlane, after
5 speaking with Dr. Arauzo and a Melanie Domen who does
6 alienation -- par- -- par- -- working with parents who
7 have children that have been alienated from them, they
8 said it would do more harm.
9
                 We've already been to Hannah's House,
10 and for the most ridiculous reason, that I was able to
11 hypnotize the staff. Then going to FLP, this is our
12 second place which there were police officers there
13 with guns and metal detectors and a reinforcement that
14 Daddy is a danger to him. And matter of fact,
15 Lauriston was screaming this out: I'm afraid of you.
16 I can't be alone with you.
17
                 This would only reinforce -- going to a
18 third location, being locked into a room again,
19 reinforcing that there was some kind of danger.
20 there was no way out, and this was doing more harm.
21 Not coming from my own opinion, but coming from some
22 of the best experts that I had accessed for
23 counseling.
24
            Well, today I'm not asking for you to tell
25 us about what you think these experts thought.
```

```
1 asking you to tell me what you thought. Just you,
2 Mr. Crockett.
3
                  So why did you decide not to see your
4
  son for a year?
5
                  MS. LEWIS: Objection, form.
6
            Because it was harmful to him.
7
       Ο.
            Okay. And you made the decision that seeing
  your son at the B & E facility would be harmful to
9 him?
            After counseling, yes.
10
       Α.
            Okay. And just so I'm clear, you thought it
11
12 was better, it was in the best interest of your son to
13 hot see you rather than to see you at B & E facility?
14
       Α.
            When your child is on the phone to you
15 saying, Can you --
16
                  MS. HAYES: Objection, nonresponsive.
17
            It's just a yes or no. You believe the
18 decision you made not to see your son was in his best
19 interest?
20
       Α.
            Yes.
21
            Okay. Now, at some point you began having
       0.
22 Anna meet you off-site in the last year; is that true?
23
            That is correct.
       Α.
24
            And you did so knowing that your son would
25 not be appearing; isn't that correct?
```

I did not. 1 Α. 2 You were not aware that your son was not 3 appearing? Well, we had access through the court order that we could still have access off location, so we 5 6 requested it. All I can do is request. 7 MS. HAYES: Objection, nonresponsive. 8 Ο. Nikki would send you Our Family Wizard 9 messages explaining to both you and/or Anna that she 10 was not going to come to an off-site location. 11 that true? 12 MS. LEWIS: Objection, form. Doesn't really matter what Nikki said. It 13 Α. 14 matters what the court order gave permission to do, so 15 I followed the court order, ma'am. MS. HAYES: Objection, nonresponsive. 16 17 Mr. Crockett, do you understand my question? 18 Let me try to --19 I understand you're gaslighting. Α. 20 MS. HAYES: Objection --21 And not asking a true question or the truth. Α. 22 MS. HAYES: Objection, sidebar; 23 objection, nonresponsive. 24 Q. You don't like being out of control, do you, 25 Mr. Crockett?

```
1
            Ma'am, control is an illusion. No one has
       Α.
  control.
3
                  MS. HAYES: Objection, nonresponsive.
            Are you capable of answering a yes/no
4
5
  question yes or no?
6
       Α.
            Yes.
7
            Do you understand? Okay.
        Ο.
8
       Α.
            Yes.
9
            I just want to make sure the directions are
       Q.
10 clear.
11
                  So isn't it true that Nikki would tell
12 you that she would not be appearing at the park to
13 see -- for -- for Lauriston to see you outside of
14 B & E?
15
                  MS. LEWIS: Objection, form.
16
       Α.
            Yes.
17
            Okay. And isn't it true you would go to
18 these parks anyway with Anna and wait so that you
19 could document her non-appearance?
20
       Α.
            Hoping that my child would -- would show,
21 yes.
22
       Q.
            Okay. And you paid Anna for this time, did
23 you not?
24
       Α.
            Yes.
25
       Q. And how much do you pay Anna?
```

A. A hundred dollars.

1

- Q. And would you -- how long would Anna wait
- 3 with you at this location for that hundred dollars?
 - A. Up to 40 minutes.
- 5 Q. And did you text with Anna -- well, strike
- 6 that. What form of communication did you use with
- 7 Anna to schedule these visits?
- 8 A. Phone calls and -- phone calls, if I recall.
- 9 Maybe a text message or two.
- 10 Q. And were you -- did you explain to Anna that
- 11 you did not anticipate that your son would arrive but
- 12 that you'd like to have these visits anyway?
- 13 A. No, ma'am. That wasn't in our conversation.
- 14 O. Okay. Did Anna explain to you that Nikki
- 15 had indicated to her that she wouldn't be coming?
- 16 A. Yes.
- 17 Q. And did you and Anna ever have any
- 18 conversations about the ethics involved in her
- 19 paying -- that you're -- you're paying her to stand
- 20 with you at these visits?
- 21 A. I'm sorry. I don't understand your
- 22 question.
- 23 Q. Sure. Did you and Anna ever have any
- 24 discussions about kind of the perception of how it
- 25 appears or the optics of her being paid to come stand

```
there at a visit with you?
2
       Α.
            No, ma'am. That was never in any of our
3 conversations.
            Anna never told you she had concerns about
       Ο.
5 you paying her to show up at these visits knowing the
6 child wasn't coming?
7
            We never had a conversation about that, to
       Α.
  the best of my knowledge.
       Q. But she did report to you that Nikki wasn't
9
10 coming? Or at least that Nikki indicated to her she
11 wasn't coming, right?
12
                  MS. LEWIS: Objection, form.
13
       Α.
            Yes.
14
            Okay. And how many times do you recall
15
  showing up for these visits and paying Anna to attend?
             I recall six times.
16
       Α.
            Have you ever given Anna -- Anna any gifts?
17
       Q.
18
       Α.
            Gifts?
19
       Ο.
            Correct.
20
       Α.
            No.
21
            No Genostim product or supplements or
       Q.
22 vitamins or anything of that nature?
23
       Α.
            No.
24
            Have you given Anna any compensation other
25 than the $600 you purport to have paid her?
```

- 1 A. I don't understand the question.
- Q. Well, have you given anything to Anna other
- 3 than the \$600 you testified to?
 - A. No.
- Q. Did you ask Anna to document the fact that
- 6 Nikki did not appear for these visits?
 - A. I didn't have to ask her.
- 8 0. Is that a no?
- 9 A. To the best of my knowledge, no. She did it
- 10 on her own.

7

- 11 Q. Is it your belief that she documented the
- 12 fact that you two were at a park and that your child
- 13 didn't appear?
- 14 A. I think she was required to, to the best of
- 15 my knowledge, yes.
- 16 Q. Okay. Do you believe those were filed in
- 17 this court?
- 18 A. I -- I believe -- yes. Yes. Yes.
- 19 Q. Okay. Now, you've used the word
- 20 "alienation" numerous times today. Tell me what
- 21 that -- what is alienation to you?
- 22 A. Well, alienation is family -- family abuse
- 23 by using techniques to turn a child against another
- 24 parent and to break a relationship, a loving bond and
- 25 relationship.

Do you believe --1 Q. 2 Α. That's a really elementary way of putting 3 it, but that's how I would describe it. Okay. Do you believe that you and your son had a loving bond prior to 2019? 5 6 Α. I think I could -- well, I'll say yes. 7 Okay. Now, you understand that the child Ο. was seeing a counselor to address concerns about that bond in 2019, right? 10 Which counselor would that be? 11 Several counselors. This child has seen 12 several counselors --13 Α. Mm-hmm. 14 Ο. -- right? Yes? 15 Yes, yes. Α. 16 Ο. Okay. 17 I remember Dr. Guy Chandler very well. Α. 18 And there was so much concern about you Q. 19 being the alienating parent that the Court implemented 20 this supervision order; isn't that true? 21 MS. LEWIS: Objection, form. 22 No. I don't believe that's why that was Α. 23 done. 24 And don't you bel- -- do you recall Jennifer 25 Frendle recommending that you only have supervised

```
1 access based on your alienating behavior?
2
                 MS. LEWIS: Objection, form.
3
            Do I remember her saying that? Could you
4 repeat that again, please?
5
            Sure. Isn't it true that in the child
       0.
6 custody evaluation for which this order resulted --
7
       Α.
            Mm-hmm.
           -- Jennifer Frendle indicated that she had
  concerns about you being unsupervised with the child
10 due to alienation tactics that you were utilizing?
11
            I don't remember alienation tactics. I
12 remember her making a psychological evaluation that
13 she didn't have the license to do, that I was a
14 dangerous narcissist and to take away my guns, which
15 were --
16
                 MS. HAYES: Objection, nonresponsive
17 after, I don't remember.
18
       Q. Did you review the 2019 child custody
19 evaluation, Mr. Crockett?
20
            Yes. I had it reviewed by a forensic
       Α.
21 psychologist, yes.
22
                 MS. HAYES: Objection, nonresponsive
23 after yes.
24
       Q. And there were significant concerns about
25 you speaking ill of the mother to the child. Do you
```

```
1 recall that?
2
            I remember there were concerns on both
3 sides.
                  MS. HAYES: Objection, nonresponsive.
5
             I'm asking about concerns that the child
6 custody evaluator had about you, okay? Let's just
  talk about you for a minute.
8
       Α.
            Okay.
            Do you recall there being concerns about you
9
       Q.
10 speaking ill of the mother to the child?
11
            I don't remember exactly what she said, but
12 there were concerns of possible alienation.
13
            Okay. And some of this had to do with the
       Q.
14 accident that Ms. Ngo was involved in; is that right?
15
            I don't recall -- I -- I do recall what she
       Α.
16 said about that.
17
            Okay. And there is a discrepancy between
       Ο.
18 you and Ms. Ngo about what caused this accident where
  she was run over by a vehicle; is that right?
19
20
       Α.
            Yes.
21
            Is it funny to talk about?
       0.
22
            I find it totally ludicrous.
       Α.
23
       Q.
            Okay.
            Since I wasn't there.
24
       Α.
25
            Oh. Your testimony now is that you weren't
       O.
```

```
there when she was run over by this vehicle?
2
       Α.
            My two polygraphs prove that also.
3
                 MS. HAYES: Objection, nonresponsive.
            Yes, ma'am, my -- my testimony is, I was not
       Α.
5
  there.
6
            Okay. Is that new testimony, Mr. Crockett?
7 Did you --
8
       Α.
           No, ma'am --
9
            -- just start testifying to that?
       Q.
10
       Α.
          -- it is not.
11
       Q.
            Okay.
12
       Α.
            I was in the house with the nanny. I have a
13 witness of where I was.
14
            Okay. And just to be clear, you told the
       O.
15 child that the mother was trying to kill herself and
16 ran herself over; isn't that true?
17
            That is -- no.
       Α.
18
       Q.
            That's not correct?
19
            That is incorrect.
       Α.
20
       Q.
            Well, you've heard a recording of the child
21 saying that, right?
22
            I've heard a recording of the child saying a
       Α.
23 lot of things. That doesn't mean it's correct.
24
                 MS. HAYES: Objection, nonresponsive.
25
       0.
            You've heard a recording where the child
```

```
1 indicated you told him that his mother was trying to
2 kill himself?
3
                 MS. LEWIS: Objection, form.
            No, I have not heard that recording.
4
5
            Okay. Did you read a transcript of the
       Ο.
6 recording where the child reported you told him that
7 his mother was trying to kill himself -- kill herself?
8
                 MS. LEWIS: Objection, form.
9
       Α.
            Not the way that you're -- not the way that
10 you're putting it, no.
11
            Well, is there any other way to talk to a
12 child about his mother trying to commit suicide?
13
            I don't know, ma'am. I never had the
       Α.
14 conversation.
15
            What did you tell your child about that
       Ο.
16 accident where Ms. Ngo was run over by a vehicle?
17
            Ma'am, I never really had a conversation
       Α.
18 with Lauriston about that.
19
       0.
            Your testimony is, you've never spoken to
20 your son about that accident?
21
       A. He's brought it up. I said, Mama had a
22 accident. And that's about as far as I've gone into
23 it.
            Okay. So the word suicide or, Mommy tried
24
25 to commit suicide, never came out of your mouth to
```

```
your child?
2
       Α.
            Never.
3
            Okay. Now, there's been discussions about
       Ο.
4 your having narcissistic personality disorder.
  you read a report regarding that diagnoses?
6
                  MS. LEWIS: Objection, form.
7
            Are you talking about from -- yes.
       Α.
8
       Ο.
            Okay. Have you ever been diagnosed with
  narcissistic personality disorder?
10
       Α.
            No.
11
            Do you know what narcissistic personality
12 disorder is?
13
            I think I have an idea. I did take a
       Α.
14 psychological evaluation from Dr. James Davidson, and
15 I tested with no personality disorders.
16
       0.
           And can you tell me what somebody with a
17 marcissistic personality disorder would look like?
18
       Α.
             I think that someone with narcissistic
  personality disorder -- ma'am, I'm not a -- I'm not a
20
  psychologist, so...
21
            What's your understanding of what it is?
       Ο.
22
            I believe that the world revolves around
       Α.
23 them.
24
            Do they look into the camera a lot and try
25 to put on a show?
```

```
MS. LEWIS: Objection, sidebar and
1
2
  form.
3
        Ο.
             You can answer.
             I wouldn't say so. I don't believe that
  qualifies as narcissism.
5
6
                  MS. HAYES:
                              Object as nonresponsive.
7
             Do you remember the incident where Nikki was
        Ο.
  run over by a vehicle?
9
             Yes, I do remember this day.
       Α.
10
        Ο.
             And you called the police; is that right?
11
       Α.
             Yes.
12
       Ο.
             Okay. And your testimony is -- well, let me
13 back up.
14
                  Were you and Ms. Ngo in an argument
15 when that accident occurred?
             We were in an argument before the accident
16
17 occurred.
18
       Q.
             But it's your testimony, you didn't follow
  her out to the car and pull her out of the vehicle?
19
20
       Α.
             It's my testimony and witness testimony.
21
                  MS. HAYES: Objection, nonresponsive.
22
             I'm just talking about you, Mr. Crockett.
       Q.
23
             Yes, ma'am. No, I did not follow her out to
       Α.
24 the car.
25
             Okay. Now, during this 2021 problem at FLP,
       Ο.
```

```
1 did it ever occur to you that perhaps your son just
2 didn't want to see you?
            After two years of him going through what he
3
4 had to go through to see me, after alienation
  techniques --
5
6
                  MS. HAYES: Objection, nonresponsive.
7
            -- that were being used --
       Α.
8
                  MS. HAYES: Objection, nonresponsive.
9
            It's just a yes or no.
       Q.
10
       Α.
            What was your question?
11
            Sure. Could you contemplate -- in 2021 when
12 he was refusing to see you, did -- did you contemplate
  the fact that maybe he just didn't want to see you?
13
            With everything that happened, yes.
14
       Α.
15
            Okay.
       Q.
                 MS. HAYES: Objection, nonresponsive
16
17 other than yes.
18
       Q.
            Do you believe you could've had any role or
19 played any role in your child not wanting to see you?
20
       Α.
            Ma'am, I've been under supervision for three
21 years. Everything that I have said or done with this
22 child is documented, so I'll let the evidence speak
23 for itself and say no.
24
                 MS. HAYES: Objection, nonresponsive
25 other than no.
```

```
So for whatever reason your child has
1
       Q.
2 indicated that he didn't want to see you, it's
3 somebody else's fault other than your own. Is that
4 your testimony?
5
       Α.
            Yes.
6
       Ο.
            Okay. Did you -- you understand that Logan
7 told the supervisors at Hannah's House he didn't want
8
  to see you, right?
9
                 MS. LEWIS: Objection, form.
            I was never informed of that.
10
            You were never informed by anyone, from
11
12 Scott at Hannah's House that Logan indicated he didn't
13 want to see you?
14
                 MS. LEWIS: Objection, form.
15
       Α.
            To the best of my knowledge, I don't
16 remember any of that.
17
            Do you remember Scott indicating that
       Ο.
18 children cannot dictate or -- or end visits for any
19 reason?
20
       A. I -- I know that happens to be Hannah's
21 House policies.
22
                 (Exhibit 10 marked.)
23
            Okay. I'm showing you what I've marked as
24 Exhibit 10. You've seen this produced previously in a
25 hearing. Do you recall when Scott testified regarding
```

```
the interaction with him and my client, about Logan
  trying to terminate access with you?
            Ma'am, I don't remember this.
3
            Okay. Would it surprise you if Logan wanted
  to terminate access with you during his period of time
6 at Hannah's House?
7
            Well, no.
       Α.
8
       Ο.
            Okay. So just to be clear, the first
9 supervisor that you utilized after the entry of this
10 court order, it doesn't surprise you that your son
11 didn't want to see you?
12
       Α.
            Well, no, with the --
13
       Q.
            Okay.
14
       Α.
            -- knowledge I -- I know -- I have now, no.
15
                  MS. HAYES: Objection, nonresponsive
16 after no.
17
            And he also told FLP that he didn't want to
       Ο.
18 see you, right? We've talked about that?
                 MS. LEWIS: Objection, form.
19
20
            Mm-hmm.
       Α.
21
            Okay. And you understand he told Vickie at
  some point that he didn't want to see you, right?
22
23
                 MS. LEWIS: Objection, form.
24
            No. Vickie has never told me anything about
25 that.
```

```
Okay. Well, you've heard Vickie testify or
1
       Q.
2 give her statements in court occasionally during
3 hearings in court, right?
            (Laughter.) Yes, I have.
5
            Can you tell me what's funny about that,
       0.
6 Mr. Crockett?
7
            Yes. It's -- it's very funny how you two
       Α.
8 have -- she's basically been your side chair this
9 whole time, and you two work off of each other and the
10 Court to eat up my attorneys' time.
11
                 Also, she's had absolutely zero contact
12 with me in over two years trying to keep Lauriston
13 with me on the holidays or anything else. So I think
14 Mary McKnight, Attorney Mary McKnight, said it best
15 that -- what a conspiracy you two are.
16
       Q. And the conspiracy is between me and
17 Ms. Alexander?
18
       Α.
            I think the evidence speaks for itself,
19 ma'am.
20
                 MS. HAYES: Objection, nonresponsive.
21
            Just to be clear, you're telling the Court
       0.
22 you think there's a conspiracy between me and
23 Ms. Alexander?
24
            No, ma'am. What I told you is that my
25 attorney Mary McKnight --
```

```
1
                 MS. HAYES: Objection, nonresponsive
  after, No, ma'am.
            -- made the statement.
3
            Mr. Crockett.
4
       0.
5
                 MS. HAYES: Objection, nonresponsive
6 after, No, ma'am.
7
            You understand your son told Jennifer
  Frendle he didn't want to see you, right?
9
                 MS. LEWIS: Objection, form.
10
                 MS. HAYES: What's your question?
                             The question contains
11
                 MS. LEWIS:
12 hearsay.
13
                 MS. HAYES: That is not an objection
14 for a form objection.
15
            So are you aware that your son told Jennifer
16 Frendle he didn't want to see you?
17
            Yes. I witnessed it.
       Α.
18
            Okay. So if -- just hear me out. If your
       Q.
19 son told Hannah's House, FLP, Vickie, and Jennifer
  Frendle that he didn't want to see you --
20
21
       Α.
           Mm-hmm.
       Q. -- could it be possible that he was telling
22
23 the truth?
24
       A. I would have to say no.
25
       Q. Okay. You also understand he told Rochelle
```

```
1 Ritzi he didn't want to see you, right?
2
            I -- I really don't know if he told her that
       Α.
3 or not.
            Okay. And you're laughing again. Is there
       Ο.
  something funny about Rochelle Ritzi?
5
            Well, yes, there is.
6
       Α.
7
            Is she in the conspiracy as well?
       Ο.
8
       Α.
            Well, ma'am, I think if we read the email
9 again, she was part of it. And she did move forward
10 the next day to try to massage and extract information
11 from Lauriston.
                 THE WITNESS (to Ms. Alexander): Where
12
13 you should have protected him as the amicus.
14
                 MS. HAYES: Objection, nonresponsive
15 after -- well, objection, nonresponsive.
16
       Q. So again, just my question would be, so you
17 believe now Ms. Alexander and myself and Dr. Ritzi are
18 in a conspiracy against you?
19
            Ma'am, I didn't say that. I think the email
       Α.
20 speaks for itself that the child should have been
21 protected.
22
                 MS. HAYES: Objection, nonresponsive
23 after, Ma'am, I didn't say that.
24
       0.
            So just to be clear, you believe, if your
25 child has made these statements to these individuals,
```

```
that he wasn't telling the truth?
             I believe that Lauriston has been alienated
2
       Α.
  and harmed by his mother and also by Rob Cottingham.
            Okay. And we'll come back to Rob.
       Ο.
5
                  You would agree with me that hockey is
6
  something that this child loves, right?
7
       Α.
            No.
8
            You don't think he loves hockey?
            I know what he told me before he was taken,
9
       Α.
10 so I only have this reference. I know that he
11 performs to get affection through hockey. I know that
12 he only basically gets out of the house when he's
13 taken to hockey. So this is his only type of
14 entertainment, to the best of my knowledge. This is
15 what I know. I also know what the child and I had
16 discussions about before this started.
17
                 MS. HAYES: Objection, nonresponsive
18 after no.
19
       Α.
            Okay.
            Have you -- well, you indicated earlier that
20
21 you went to one hockey game years ago for your son; is
22 that right?
23
            No. I just went this last week -- two weeks
       Α.
24 ago.
25
            Okay. Is that the second game you've
       Q.
```

```
1 attended for your son?
2
             I've been to many practices and have been
       Α.
  to, God, three games, I believe.
            Okay. And do you know how long your son has
5
  been playing hockey?
6
       Α.
            He's been playing -- he's been on the ice, I
7 believe, since he was five. Five or six.
8
       Ο.
            And he is 11 now; is that right?
            11 and a half.
9
       Α.
10
       Ο.
            So five or six seasons he's been playing
11 hockey?
12
       Α.
            To the best of my knowledge, yes.
            And you've attended three games?
13
       Q.
14
            Yes, because I haven't been allowed to come.
       Α.
15
                  MS. HAYES: Objection, nonresponsive
16 after yes.
17
            What hockey equipment have you bought your
       Q.
18 son?
19
             I bought him skates. I bought him his
20 protection gear for legs.
21
                  I'm a football player, so I don't have
22 the exact terminology.
23
                  I bought him shoulder pads, I bought
24 him a helmet, and I bought him a hockey stick.
25
       Q. When did buy him these things?
```

```
Right when Rochelle Ritzi said -- since I
1
       Α.
2 asked Rob if we could share the hockey equipment and
3 work together and they said no, Rochelle Ritzi gave me
  the advice to go buy my own.
5
                 MS. HAYES: Objection, nonresponsive.
6
       Ο.
            Just when? Give me a -- a year.
7
            Ma'am, I don't remember. He was six, I
8
  guess.
9
            So the last time you bought --
       Q.
10
       Α.
            Six or seven.
11
            -- hockey equipment for your son was five
       Q.
12 years ago? Does that sound about right?
13
       Α.
            Yeah.
14
       Ο.
            Okay.
15
       Α.
            Yes.
16
       Ο.
            Have you ever offered to take your son to a
17 hockey game?
18
       Α.
            I have gone -- I have done everything I can
19 to try to see him in hockey.
            Okay. My question is, have you ever offered
20
       Q.
21 to maybe take him on a supervised visit at a hockey
22 game?
            Well, I couldn't.
23
       Α.
24
                  MS. HAYES: Objection, nonresponsive.
25
            It's just a yes or no, Mr. Crockett.
       Ο.
```

Then the answer is no. 1 Α. 2 In the last two weeks, have you suggested O. that maybe you should take your son to a hockey game? It's actually harmful for Lauriston when I'm there. 5 6 Ο. Because he doesn't want you there, right? 7 No. Because of alienation. Α. 8 MS. HAYES: Objection, nonresponsive 9 after no. 10 Ο. Do you know what team your son plays on? 11 The Heat. Α. 12 Ο. Okay. And how long has he been on that 13 team? 14 Well, it's -- it's confusing because he Α. 15 was -- he made a team in Plano. And we were on the 16 phone speaking, and I told him I was going to start 17 coming and watching his games. And within a week he 18 was transferred to The Heat in Euless, Texas. So I 19 don't have those dates. 20 MS. HAYES: Objection, nonresponsive 21 other than, I don't have those dates. 22 You receive a team schedule every season for Q. 23 your son, right? 24 Α. No. 25 Do you review the -- the posts on Our Family O.

```
Wizard so that you have your son's schedule?
2
             I rec- -- excuse me?
       Α.
3
             Sure. Do you receive the schedule, your
       Ο.
  son's schedule, on Our Family Wizard?
4
            Schedule for school or hockey?
5
       Α.
6
       Ο.
            For hockey.
7
             I'm only told about a few games that are
       Α.
  being played maybe when he's traveling. I only
9 received a schedule after Judge Moore put it in an
10 order that Nikki had to turn it over to B & E within
11 seven days. And I received that one, and that turned
12 out to be a wrong schedule.
13
                  MS. HAYES: Objection, nonresponsive.
14
            Do you receive a copy of the hockey schedule
       Ο.
15
  each year from Nikki on Our Family Wizard?
            I received one last week, and I get periodic
16
17 games he's playing; but I don't recall getting a full
18 schedule.
19
            Okay. Are you aware of the next upcoming
  out-of-town tournament that your son is playing in?
21
            I believe he's playing in Houston. But I
       Α.
22 could be wrong, because I'm -- I'm referring back to
23 when I was sent the schedule of the 10 UA from Nikki.
24 Which he doesn't play on the 10 UA. He plays on the
25 | 12 UA. So apparently she doesn't even know what team
```

```
1 he's in.
                  MS. HAYES: Objection, nonresponsive.
2
3
            It's just a yes-or-no question,
       0.
4 Mr. Crockett.
5
            Ask the question again, please.
       Α.
6
             Sure. Do you know where your son's next
  out-of-town tournament is?
8
       Α.
            I am not sure.
9
            Okay. You were asked to take your son to
       Q.
10 his hockey tryouts, weren't you?
11
       Α.
            Never.
12
       Ο.
            Never happened?
            I don't recall ever.
13
       Α.
14
            And you -- if you don't agree that hockey is
       Ο.
15 his favorite activity, what do you think his favorite
16 activity is?
17
            Ma'am, I think that Lauriston, one of his
       Α.
18 favorite activities is -- is hockey. I also know that
19 he acquired a red belt in karate and enjoys karate. I
20 also know that Lauriston likes horseback riding. He
21 loves to go fishing with me and -- he and I together.
22 It was amazing to watch him catch his first fish.
23
                 He loves playing with the other
24 children in the neighborhood. He loves visiting and
25 laughing with family. He loves to go to movies. He
```

```
1 is amazing with his skills of drawing cartoons and his
2 imagination and everything.
3
                  So he has many, many things that he
4 likes that we've discussed and we did together.
5
            And all of these things that you've just
6 listed off, you had a year of an opportunity to spend
  time doing things with him, didn't you?
8
       Α.
            No.
9
            All you had to do was go to B & E facility
       Q.
10 and exercise your possession; isn't that true?
11
                         There was none of these -- you
            No, ma'am.
12 can ask me again. You -- you can't do that in FLP.
13 You can't do that at B & E. You can't do that at
14 Hannah's House, barely.
15
                  You are in a stirile-- sterile
16 environment that you can only speak about what is
17 going on in that room at that time, at that moment.
18
                  You can't speak about what he had for
19 lunch. You cannot speak about what he did yesterday
20 or the day before or what's happening tomorrow.
21
  can --
22
                  MS. HAYES:
                              Objection, nonresponsive.
23
             -- only speak about what's taking place --
24
                  MS. HAYES:
                              Objection.
             -- there at the time.
25
       Α.
```

```
Mr. Crockett, for the fiftieth time today,
1
       Q.
  when I object, stop speaking.
3
                 MS. HAYES: Objection, nonresponsive.
            Do you agree it's in your son's best
5 interest to continue playing hockey?
6
       Α.
            If that's what Lauriston wants to do,
7 absolutely, with all the support from all of his
8 family and his friends to support this child in what
9 he'd like to do. Absolutely, I agree.
10
                 MS. HAYES: Objection, nonresponsive
11 other than absolutely.
12
       Ο.
            Do you believe it's in your son's best
13 interest to attend all of his games?
14
            If this is what he wants to do, yes.
       Α.
15
            Do you believe it's in your son's best
       0.
16 interest to attend his tournaments, his out-of-town
17 tournaments for hockey?
18
       Α.
            With his mother attending, yes.
19
            Would you be interested in taking him to his
       Ο.
  out-of-town tournaments?
21
            If we can get past the alienation and the
       Α.
22 harm and the fear and the anxiety, yes.
23
                 MS. HAYES: Objection, nonresponsive
24 other than yes.
25
       Q. It's really pretty simple. If you -- if he
```

```
1 has an out-of-town or out-of-state tournament, would
2 you like to take your son to it?
            If that's what he would like me to do, yes.
3
            Okay. Are you willing to take your son to
  an out-of-state tournament?
5
6
       Α.
            If that's what he'd like me to do, yes.
7
       0.
            Have you asked your son if he wants you to
  take him?
9
       Α.
            Yes.
10
            And what did he tell you?
           He says, You're not allowed to come to
11
12 hockey. You're a danger. Don't come here. My mama
13 said. My mom is the only one that tells the truth.
14 You cannot come.
15
            That's contrary to what you testified to in
       Ο.
16 court two weeks ago, isn't it?
17
            I don't understand what you're talking
       Α.
18 about, ma'am.
19
       Q. Okay. Well, we'll come back to it.
20
                 Do you know who your son's best friends
21 are on his hockey team?
            No, I don't.
22
       Α.
23
            Do you know who your son's best friends are
24 at his school?
25
       A. Lauriston has basically told me that friends
```

```
1 are not important. The only friends that I know of is
2 a child who just moved here from Australia, and I
3 believe his name was Harry.
                  MS. HAYES: Objection, nonresponsive.
5
            Do you know who your child's best friends
6 are at school right now?
7
            You're using friends, as in plural. I only
       Α.
8 know of one friend that he talks about, because he
9 says he's been bullied.
10
            Okay. So your son -- when did your son tell
11 you he's being bullied at school?
12
       Α.
            Two years ago.
13
                  He's also told Dr. Frye and Jennifer
14 Frendle, to the --
15
       0.
            So --
16
            -- best of my knowledge.
            So -- well, you weren't present when he
17
       Ο.
18 allegedly told Jennifer Frendle, right?
19
            I only know what she's spoken with me about.
       Α.
20
       Ο.
            Okay. So I'm only asking about what you
  know personally, what you've heard personally.
21
22
       Α.
            Mm-hmm.
            And so your testimony is that Lauriston told
23
24 you when he was in fourth grade that he was bullied,
25 and he's now told Dr. Frye the -- excuse me -- Kristi
```

```
Frye the same thing. Is that your testimony?
2
       Α.
            Yes.
3
            Okay. And has he made any complaints about
       Ο.
4 bullying in fifth or sixth grade?
5
            In fifth grade. So far this year when I've
6 spoken to him very lightly, How are things going?
7 you having fun? And he talks about, he has one
8 friend. And then we talk about his grades, and I talk
9 about how proud he is. So again, to answer your
10 question, not this year.
            Okay. Don't you think those are things that
11
12 you would be discussing with your son on your phone
13 calls weekly?
14
             I would love to do that, but Lauriston cuts
       Α.
15 the conversations off. He's also being monitored at
16 all times and has actually said, Can you please make
17 it that I never have to speak to you again?
18
                 MS. HAYES: Objection, nonresponsive.
19
            Do you think that you should be discussing
       0.
  with your son on your weekly phone calls who his
21
  friends are and how things are going in his life?
22
            Yes, I do and -- and I try.
       Α.
23
            Okay. And is your testimony to the Court
24 that your son does not want to respond to these
25 questions when you elicit this information from him?
```

```
You know, over the last, I would have to
1
       Α.
2 say, six mo- -- after seeing Dr. Frye, things started
3 changing drastically. And -- and --
                 MS. HAYES: Objection, nonresponsive.
5
            -- now we have major, wonderful
6 conversations.
7
                 MS. HAYES: Objection, nonresponsive.
8
       Ο.
            It's just a yes or no. Do you think --
9 well, let me ask it a different way.
10
                 When you say, Hey, Lauriston, who did
11 you hang out with today at lunch, what is his response
12 to you?
       A. We usually -- I haven't asked him that
13
14 question. I usually talk about how was recess. And
15 then he wanted to tell me about a girlfriend that he
16 had a crush on.
17
            Was this two years ago, in fourth grade?
       Q.
18
            No. This was actually this year.
       Α.
19
            Okay. Who's the girlfriend he had a crush
       Ο.
20 on?
21
           You know, I don't remember what sh- -- last
       Α.
22 year it was a girl with red hair. Year before that,
23 it was a little girl with brunette and freckles and
24 glasses.
25
                 This year he said a girl said hello to
```

```
1 him. And I said, Remember, always be kind and -- and
2 wave back.
3
                  I don't remember her name.
                  MS. HAYES: Objection, nonresponsive --
4
5
             I don't even know if he gave me the name.
6
                  MS. HAYES: Objection, nonresponsive
7 other than, I don't remember her name.
8
       Ο.
            Who does your son tell you he plays with at
  recess?
10
       Α.
            He tells me that the other boys want to play
11 football. Some don't want to play with him, so he'll
12 usually go play with the teachers and -- and some of
13 the other students that are new to the school.
            Okay. What is your son's favorite subject?
14
       Ο.
            Social Studies.
15
       Α.
            And who is his teacher?
16
       Ο.
            Oh, my gosh. I get emails from her. I can
17
       Α.
18 go through my attorney and give it to you. I get all
19 the emails.
20
            Okay. What house is your son in at the
       Ο.
21 school?
22
            Ma'am?
       Α.
23
            What house is he in at the school?
       Q.
24
            Well, we just changed houses, and I don't
25 remember right now.
```

```
1
            You mean you changed houses from fifth grade
       Q.
  to sixth grade?
3
       Α.
            Yes.
       Ο.
            Okay.
5
            And -- and this is -- this is very
6 different, because I've never been to schools where we
7 had houses before. We had classes and grades.
8
       Ο.
          Sure.
9
            So -- so Highland Park has something that
       Α.
10 I've never experienced before to -- so, to remember
11 his house he's in right now, ma'am, I don't remember
12 right now. I know that I read every email.
           Okay. Do you know who his school counselor
13
       Q.
14 is?
15
            This year?
       Α.
16
       Ο.
            Correct.
17
            No, I've had no correspondence with her at
       Α.
18 all.
19
            Okay.
       0.
20
            I did have correspondence with his counselor
21 from last year.
22
                 MS. HAYES: Objection, nonresponsive
23 after no.
24
            What do you think you are doing,
25 Mr. Crockett, to pay -- play an active role in your
```

1 son's life?

10

- A. Everything that I can do to see him, spend time with him, talk about his interests, what are his passions, and being able to sit back as a dad and listen and reassure him that he's loved by his family and his friends and that he's supported.
- Q. Okay. And give me an idea of what you talk about with him that fills any one of those buckets that you just listed off.
 - A. On which occasion, ma'am?
- Q. Well, you said that it's important to talk about things that he cares about.
- A. Oh, my gosh. Well, the last time he
 finally -- he came home, he now wants to start playing
 golf. He's very proud of his grades. He likes
 hockey, but he wants to start racing boats in the
 pool; and he wants to start racing RC cars. He has
 different interests now in little race -- or electric
 race cars.
- We talk about his friends. But most of his friends, he said, are in his hockey. He doesn't have a lot of friends in school. We talk about the favorite things that he likes to eat. We talk about his artwork.
- 25 He likes to share with me about how

```
1 fast he is and how we run and how we play and -- and
2 things. And so the last couple of weeks, we -- we
3 talk just about -- about anything that he wants to
4 talk about. And of course I reassure him that he's
5 loved and supported, and he's just the coolest kid I
6 know.
            But yet in the past when he tries to talk to
       0.
8 you about hockey, you tell him that football is
9 better; isn't that true?
10
            No, ma'am, that is not true --
11
       0.
           And --
12
       Α.
           -- matter of fact, that's the opposite.
13
                 MS. HAYES: Objection, nonresponsive
14 after, No, ma'am.
15
       Q. Isn't it true you've actually told him
16 you're tired of hearing about hockey?
            No, ma'am. To the best of my knowledge,
17
       Α.
18 I've never said that.
19
           You've never told your child you're tired of
       Ο.
20 hearing about hockey?
21
            To the best of my knowledge, I've never said
       Α.
22 that to him.
23
       Q.
          Okay. And have you reviewed the notes from
24 Rochelle Ritzi?
25
       A. No, ma'am, I have not.
```

```
(Exhibit 8 marked.)
1
2
             Okay. I'm showing you what I have marked as
       Ο.
3 Exhibit 8. This is an Our Family Wizard message that
4 you sent to Nikki; is that right?
5
             (No response.)
       Α.
6
             It's a yes or no, Mr. Crockett. Do you
7 remember sending this message?
8
       Α.
             No. But I'm still reading it, if you don't
9 mind waiting for me to finish it.
10
                  Yes, I discussed with Nikki about
                It's very clear.
11 alienation.
12
       Ο.
             Okay. And you said:
13
                  The only thing that this child can talk
14
                  about is hockey, other than staying in
15
                  the house with you all day.
             Right?
16
17
             Yes.
       Α.
18
             And you accused her of somehow brainwashing
       Q.
  the child because all he can talk about is hockey,
20
  right?
             Accused her of brainwash?
21
       Α.
22
             Correct.
       Q.
23
             Is the word "brainwash" in here?
       Α.
24
       0.
             Sure is.
25
       Α.
             Yeah, Lauriston -- it was during the
```

```
1 summertime. He says the only thing he does is stay in
2 the house with his mother, and only when Rob gets home
3 does he get to go out and play hockey.
                  MS. HAYES: Objection, nonresponsive.
5
            Mr. Crockett, you're accusing his mother of
6 brainwashing him because all he talks about is hockey,
7 right?
8
       Α.
            Ma'am, we're talking about --
9
                  MS. HAYES: Objection, nonresponsive.
10
       Α.
            We're talking about parental alienation and
11 Stockholm syndrome.
12
                  MS. HAYES: Objection, nonresponsive.
13
            Mr. Crockett, you -- you went over your
       Q.
14 educational background earlier, remember?
15
                  Remember?
16
       Α.
            Yes, ma'am.
17
            Okay. And you left college when you were a
       Ο.
18 sophomore in college. Do you remember that?
19
            I do.
       Α.
20
       Q.
            And you have no master's degree in
  psychology or any other social sciences, right?
21
22
       Α.
            No.
23
       Q.
            Okay. And you're not an expert in this
24 case, right?
25
       A.
            No, ma'am.
```

```
1
            Okay. You're just a father, and you have
       Q.
  your opinions, right?
3
            I have my opinions, yes.
            Okay. And so when you continue to word --
5 use the word "alienation," you understand that that is
6 speaking derogatory regarding this child's mother,
7 right?
8
           You could state it that way.
9
            Okay. When your child told you that he felt
       Q.
10 safe at FLP, you told his mother that she was
  brainwashing him, right?
11
            You're taking it out of context, I believe.
12
       Α.
13
                 MS. HAYES: Objection, nonresponsive.
14
            You're -- let's try it a different way.
       Ο.
15
            Ma'am, it is what it is. The child has been
       Α.
16 alienated. It's been proven.
17
                 MS. HAYES: Objection, nonresponsive;
18 objection, sidebar.
19
            Your child told you he feels safe in these
  supervised facilities, didn't he?
21
            About seven minutes into it, yes.
       Α.
22
                 MS. HAYES: Objection, nonresponsive
23 other than yes.
24
            And because your child told you he feels
       0.
25 safe at these facilities, you're accusing the mother
```

```
1 of causing it, right?
2
       A. Accusing the mother of doing -- no, ma'am.
3 I mean, we're put into reunification counseling. It
4 is not because of me.
5
                 MS. HAYES: Objection, nonresponsive
6 after no.
       Q. You don't believe you play ha- -- you play
  any role in the fact that your relationship with your
9 son is strained?
10
       Α.
            Ma'am, I -- I have been --
11
                 MS. HAYES: Objection, nonresponsive.
12
       Ο.
            It's a yes or no, Mr. Crockett. Do you
13 believe you play a role in a strained relationship
14 with your son?
15
       Α.
            No.
16
       Ο.
            Okay. So when you look at this message and
17 you tell his mother --
18
       Α.
            What is the date of this, ma'am? 3 --
19 this -- this isn't the date. This isn't the correct
20 date up here.
21
                 MS. HAYES: Objection, nonresponsive;
22 objection, sidebar.
23
       Q. When you tell his mother, This is
24 inexcusable, what you have done to our child, do you
25 think that is blaming his mother?
```

1 Α. I believe that she's a part of it. 2 MS. HAYES: Objection, nonresponsive. 3 Would you agree with me that a statement, Ο. 4 This is inexcusable, what you have done to our child, is blaming his mother? 5 6 Α. For alienation? 7 For his behavior. Ο. 8 Α. Yes. 9 And then you go on to state your opinion Q. 10 again that now your child has Stockholm syndrome or is 11 being parent -- alienated, essentially; is that right? Α. Possible. 12 Okay. And in fact, every time your son 13 Q. 14 says, I don't want to see you, I don't want to talk to 15 you, I feel safe in these enclosed environments, you 16 accuse the mother of somehow causing it, right? 17 Α. No. 18 But you've told this Court and that camera Q. 19 fifteen times today that you believe Nikki is 20 alienating the child from you; is that right? Yes. 21 Α. 22 Q. Okay. 23 THE REPORTER: Can we take a break? 24 MS. HAYES: Sure. THE VIDEOGRAPHER: We're off record at 25

```
2:40 p.m.
2
                  (Recess from 2:40 p.m. to 2:49 p.m.)
3
                  THE VIDEOGRAPHER: We're back on record
4 at 2:50 p.m.
5
             Now, at one point you had -- you were
       Ο.
6 attending practices for Logan at hockey; is that
7 right?
8
       Α.
            Yes.
9
             Okay. Where were those practices at?
       Q.
             Plano, Texas.
10
       Α.
11
             And -- and at some point you waited by the
12 curb when the child was driving out with Rob. Do you
13 remember that?
14
             Waited by the curb when Rob was...
       Α.
15
             Sure. Do you -- let me rephrase.
       Ο.
16
                  Do you remember waiting by the curb and
17 waving to Logan and Rob as they were leaving practice
18
  one day?
19
             Yes.
       Α.
20
        Q.
             Okay. Why were you there?
21
             Just support.
       Α.
22
             Okay. And why did you wait by the curb to
       Q.
23 wave to them when they left?
24
             Because I wasn't allowed in the rink.
       Α.
25
             And why weren't you allowed in the rink?
       Ο.
```

```
Because Lauriston told me that I wasn't
1
       Α.
2 allowed there.
3
            Okay. Did any Court tell you, you weren't
       0.
4 allowed there?
5
       Α.
            No. But it was -- it seemed really
6 important to him.
7
            Okay. So Logan didn't want you there, but
       0.
8 yet you showed up and waved to him anyway. Is that
9 your testimony?
10
            To show him that I supported him in hockey,
       Α.
11 yes.
12
       Ο.
            Okay. Do you mind that he's using the name
13 Logan in his hockey games or hockey tournaments?
            Do I mind?
14
       Α.
15
            Yeah, does it bother you?
       Ο.
            No. Whatever makes him happy.
16
       Α.
17
            Isn't it --
       Q.
18
       Α.
            It's not -- it's not about me. It's about
19 whatever he wants.
20
       0.
             Isn't it true that when you saw the name
21 Logan on his hockey helmet, you purchased a sticker to
22 go over it that says Lauriston instead?
23
       Α.
            No.
24
       0.
            That's not true?
            No, that's not true.
25
       Α.
```

You didn't purchase a red sticker with 1 Q. Lauriston on it so go on his hockey helmet? 3 Α. No, ma'am. Okay. Did you ask someone to cover his name Ο. Logan with the name Lauriston on his hockey helmet? 5 6 Α. I -- I don't know what -- no. 7 Okay. Do you remember using the expression Ο. 8 "town bicycle" about Nikki? 9 Α. No. 10 You don't remember ever saying that? Ο. 11 I've never said that. Α. 12 O. Do you know what that means? It had to be explained to me. 13 Α. 14 Okay. So your testimony is that you didn't Ο. say that to Rob Cottingham at hockey practice? 15 No, I never did. 16 Α. 17 Okay. Have you told your son that you hate Q. 18 his mother? 19 Α. No. 20 0. Have you told your son you don't like his 21 mother? 22 Α. No. Have you told your son that, This is what 23 Q. 24 your mom and Rob are doing to you, making them not 25 like me?

I -- I don't --1 Α. 2 Let me ask that a dif- --Ο. -- understand the question. 3 Α. Sure. That's a terrible question. 4 Ο. 5 Have you blamed Rob and Nikki for the 6 way Logan treats you? 7 Α. No. 8 Ο. To Logan? No. 9 Α. 10 Do you think you've shown any alienating 11 behavior towards Logan about Nikki and Rob? 12 Α. No. So when Jennifer Frendle found that there 13 Ο. 14 was concerns about you being an alienating parent back 15 in 2019, you disagree with her? 16 Α. Yes. 17 Do you think the calls that you're currently 0. 18 having with your son are going well? 19 Yes, yes. I'm -- Dr. Frye is amazing, yes. Α. 20 MS. HAYES: Objection, nonresponsive 21 after yes. 22 0. And how frequently are you having phone 23 calls with your son right now? 24 Α. Tuesday nights at 4:00 o'clock. As a matter 25 of fact, I was -- I may have to text and say I won't

```
1 be able to take the call at 4:00.
2
            I'm sure we can work around that. If you'll
       0.
3 remind me as we get close, if we need to take a break,
4 we can do that.
5
       Α.
            Okay.
6
            And so Tuesday is the only night you speak
  to him, at 4:00 p.m.?
8
       Α.
            Yes.
9
            Okay. And then you're currently seeing him
       Q.
10 on the -- which week -- every weekend; is that right?
11
            Well, we're supposed to, but I wasn't able
12
  to see him this last weekend.
13
       Q.
            And why was that?
14
          He was out of town.
       Α.
15
            Where was he?
       Ο.
16
       Α.
            Tennessee.
17
            And why didn't you go to Tennessee to take
       Ο.
18 him if it was your period of possession?
19
            I'm not allowed to yet.
       Α.
20
       Ο.
            Okay. Why aren't you allowed to?
21
            Well, the Court order that I have states
       Α.
22 that I don't have unsupervised visitation until
23 January 1st.
       O. Okay. Well, couldn't you take Anna and take
24
25 him on a trip, conceivably, to a game?
```

```
Well, I don't believe so. I don't believe
1
       Α.
  that's within the court order.
       O. Okay. So -- well, we'll come back to the
3
4 court order. I don't want to get too offline.
5
                 So are you scheduled to have your son
6 this weekend?
7
       A. As far as I know, we are supposed to have a
8 visitation; but we're still waiting to hear back if
9 it's either Saturday or Sunday.
10
       Ο.
            And is that because of his hockey schedule?
11
       A. Yes.
12
       O.
            Okay. Are you currently -- well, you're not
13 currently seeing your son at -- at Dr. Frye's office;
14 is that right?
15
       A. Not currently. We're right now -- no, no,
16 we're not, not currently.
       Q. Okay. When was the last time you saw your
17
18 son at Dr. Frye's office?
19
       A. Nikki stopped taking him there over four
20 months ago.
21
                 MS. HAYES: Objection, nonresponsive
22 other than --
23
       A. Four months.
24
                 MS. HAYES: -- four months ago.
25
       Q. And how many sessions do you --
```

```
1 approximately how many sessions did you have with your
2 son with Dr. Frye?
3
       A. Oh, my gosh. Let me think. Two, four, six,
4 eight, ten. Maybe ten or -- maybe ten or twelve.
5
       Ο.
            Okay.
6
            I don't recall exactly because it was every
7 other week, and then some of the times were missed.
  So I'm -- I'm speculating, I think, guessing.
            And that's fair enough. Whichever, the ten,
       Q.
10 twelve, somewhere in that neighborhood, you think?
11
            To the best of my knowledge, yes. I -- I
12 can get the exact amount if you'd like it.
13
            Okay. And do you think that you and your
       Q.
14 son made sufficient progress in your relationship in
  those ten to twelve sessions?
15
16
       Α.
17
            What do you think changed in those ten to
       Ο.
18 twelve sessions?
19
            Oh, my gosh. In the beginning he would walk
       Α.
20 in and wouldn't even talk to me. He would go hide in
21 the corner. He would draw. He would make hand
22 gestures when I would try to have conversations with
23 him. So using the skills that Dr. Frye and
24 Dr. Threats gave me, I believe we were able to break
25 through.
```

```
He would still leave messages. Because
1
2 Lauriston is an excellent artist. He's amazing.
                                                      I'm
3 so proud of him.
                  MS. HAYES: Objection, nonresponsive.
5
            Just tell me how the relationship has
6 improved.
7
             So it went from leaving messages with me on
  cartoons without speaking to me to asking me to play
9 foosball with him, to running down, knocking on the
10 door and wanting in and running and jumping to my arms
11 with, I love you, Daddy, and kisses and, Let's play.
12 So things turned around fairly quickly.
            So two questions. Number one, you're
13
       Q.
14 11-year-old son, almost 12-year-old son, calls you
15 Daddy?
16
            Mm-hmm.
17
            Okay. And he jumps into your arms and gives
       Ο.
18 you kisses?
19
       Α.
            Yes.
20
       Ο.
            Okay. And then number two, you're telling
21 me that your relationship with your son changed
22 drastically in those ten to twelve weeks, but you
23 don't think he has improved independently at all in
24 four years with Rochelle Ritzi?
       Α.
25
            No.
```

```
1
            Okay. Isn't it true that your son
       Q.
2 repeatedly has told you on the phone over the last
3 year that he did not want to come to your house?
       Α.
            No.
5
             Isn't it true that every time you would talk
       Ο.
6 about him coming to your house, he would shut down and
7 want to end the conversation?
8
       Α.
            After looking off camera and looking back,
  then he'd say he wanted to get off the phone. So to
10 me, he was being coached.
11
                  MS. HAYES: Objection, nonresponsive.
12
       O.
             Isn't it true that every time you talked
13 about him coming to your house, he would shut down and
14 want to end the call?
15
       Α.
            Every time, no.
16
       Ο.
            Okay. Most of the time?
17
       Α.
            No.
18
            Okay. How often do you think your son would
       Q.
19 want to end the call with you after you talked about
  him coming to your house?
20
21
            Over what period of time?
       Α.
22
       Q.
            The last two years.
23
            We didn't really have that many conver- --
       Α.
24 40 percent.
25
            Okay. So if 40 percent of the time your son
       Ο.
```

```
1 is shutting down after you initiate this conversation,
2 why would you ever initiate it one more time?
3
            Through counseling.
       Α.
            Okay. So you think it's healthy to keep
       Ο.
  pushing that boundary?
5
6
       Α.
            Wasn't pushing it. I was taking advice from
  the doctors that were put --
8
                  MS. HAYES: Objection, nonresponsive.
9
            Do you think it's healthy to be pushing his
       Q.
10 boundaries?
11
            Well, that's a different question.
12
       Ο.
            Okay. And you would agree with me that the
13 point of Dr. Ritzi is to help Logan establish
14 boundaries, right?
15
            I don't believe she's capable.
16
                  MS. HAYES: Objection, nonresponsive.
            Do you agree that is the purpose of
17
18 Dr. Ritzi, is to help Logan establish boundaries?
19
             I can't answer the question.
       Α.
20
       Ο.
            You don't know why your son's going to
21
  counseling?
22
            He started off as play therapy, so...
       Α.
23
            Okay. Well, you understand that in the
24 beginning of this case, there were concerns that you
25 would violate his boundaries, right?
```

I've never understood that. No. I didn't 1 Α. understand it to be that. 3 Ο. Okay. And it was never brought up to me. 4 5 MS. HAYES: Objection, nonresponsive 6 after no. 7 Would you agree that over the last two to three years, Logan has learned to set and maintain his own boundaries? 10 I don't have enough knowledge and time spent 11 with him to answer the question. 12 0. Okay. Do you remember the word "enmeshment" 13 being discussed in this case? 14 Ameshment? Α. 15 Mm-hmm, enmeshment. Ο. 16 Α. No. 17 Okay. Do you remember that there were 18 concerns that the child would say and do whatever he had to, to please you, at the beginning of this case? 19 20 I remember that it would --Α. 21 MS. HAYES: Objection, nonresponsive. 22 Q. It's just a yes or no, Mr. Crockett. Do you 23 remember that being a concern? Just with me? 24 Α. 25 I'm asking about you. Do you remember those 0.

```
1 concerns being discussed in court?
2
            Ma'am, I vaguely believe that, I think, in
       Α.
3 the beginning.
            Okay. And you understand that, at least
5 back then, the child reported he was afraid of you,
6 right?
7
       Α.
            No.
8
        Ο.
            Okay. Well, your son drew pictures about
9 you grabbing him and yelling at him if he made the
10 least amount of mistake -- if he made the least,
11 smallest mistake; isn't that true?
12
       Α.
             I've never seen these pictures.
            You haven't seen those photographs in
13
       Q.
14 discovery?
15
       Α.
            No.
16
        Ο.
            Okay. Would it surprise you that your son
17 reported that you would grab him whenever you got
18 angry with him?
19
       Α.
            Yes.
20
        Ο.
            Okay. Does it surprise you that your son
21 reported that you would yell at him if he made any
22 mistake?
23
       Α.
             Yes.
24
            Okay. Do you agree that, at least
25 historically, you expected your son to behave
```

```
1 perfectly?
2
       Α.
            No.
            And in fact, you put him on a radio show
3
  that you hosted and had him try to behave like you;
  isn't that true?
5
6
       Α.
            That's incorrect.
7
            You were sleeping with your son in the bed
       Ο.
  up till, gosh, since he was taken away from you; isn't
  that true?
10
       Α.
            No.
             There were concerns about the fact that you
11
12 would kind of force your views on your son; isn't that
13 true?
14
       Α.
            No.
15
            All right. And the Court ordered that the
16 child start seeing a counselor so he could learn to
17 set his own boundaries. Do you remember that?
18
       Α.
            I do not remember that.
19
            Okay. What did you think your son was going
       0.
  to counseling for?
21
             I believe that he was stuck in the middle.
       Α.
22 Co-parenting was not working. I believe also that
23 sometimes children will take this on themselves and
24 blame themselves.
25
                  So to me, he was going to counseling to
```

```
1 understand that this wasn't about him, he's an
2 innocent child, and that he's loved. And if he did
3 have an expression, that he'd be able to do it through
4 play therapy.
5
            Okay. On a recent call you told Logan that
       Ο.
6 Rob and Nikki were lying about you. Do you remember
  that?
8
       Α.
            No.
            You don't remember it?
9
       Q.
10
       Α.
            No.
11
            And you told Logan that the reason he didn't
12 want to talk to you was because they had told him lies
13 about you; isn't that true?
14
            That is incorrect.
       Α.
15
            Do you remember a point in time back in 2018
       Ο.
16 where both the amicus and the child's counselor
17 recommended parallel parenting in this case?
18
       Α.
            Yes.
19
            Okay. And they suggested that you and Nikki
20 not be at the same places at the same time for the
21 benefit of your son; is that right?
22
       Α.
            Yes.
23
            And then just a couple weeks later, you
24 refused to not attend any of the child's school
25 activities so that Nikki could go; isn't that true?
```

```
No, that is not correct.
1
       Α.
2
            Okay. Well, do you remember Vickie asking
       Ο.
3 you to split up Field Day, for example, so that you
4 each could take a shift and you refusing to comply
5 with that request?
6
       Α.
            No, I did comply with that request. I sit
7 on the PTA. Vickie told me to go in the morning so I
8 can fill my requirement on the PTA, because I think it
9 was the bike rodeo; so I did.
10
                 MS. HAYES: Objection, nonresponsive
11 after no.
12
       0.
            Do you believe it would be healthy for your
13 son for you and Nikki to parallel parent this child?
14
            Do I think it would be healthy if Nikki and
       Α.
15 I parallel parented?
16
       Ο.
            Yeah, do you think that's the healthiest
17 thing for your son?
18
       Α.
            I think that would be the healthiest.
19
            Okay. And meaning that you and Nikki never
       Ο.
20 be the same place the same time with your son; is that
21 right?
22
            That's not what parallel parenting is.
       Α.
23
            Okay. What do you understand parallel
       Q.
24 parenting to be?
25
       Α.
            Parallel parenting is very simple.
```

```
Well, explain it to me.
1
       Q.
2
            When the child is one ho- -- in one home,
       Α.
3 what -- the activities they do in that home and the
4 parenting skills that are used in that home are in
  that home. When they're in the other home, the same
6 things apply.
7
                  But under no circumstances should the
8 child ever feel that he is put in the middle or feel
9 quilty in any way. If the two parties cannot get
10 along in the way that they are parenting the child,
11 then co-parenting would not be a fit. Parallel
12 parenting would.
13
       Q.
            Okay. So you don't believe it has anything
  to do with possession and access of the child?
15
            In parallel parenting?
       Α.
16
       Ο.
            Correct.
17
            In absolutely everything? It's impossible.
       Α.
18
                  MS. HAYES: Objection, nonresponsive.
19
             I don't understand your question.
       Α.
20
       Ο.
            Okay. That's fair enough.
21
            Could you -- could you ask the question
       Α.
22 again?
23
            Sure. And anytime you don't understand my
24 question, feel free to ask me to explain it in a
25 different way --
```

```
1
       Α.
            Okay.
2
       Ο.
             -- so we can get some clarification.
3
       Α.
             Thank you.
            My question is, you don't believe -- when I
       Ο.
  use the term "parallel parenting," you don't believe
6 there was any -- that has nothing to do with
7 possession and access of the child? That's my
8
  question.
9
       Α.
            In -- in most cases I -- I would agree with
10 you.
11
            Okay. Now, when we talk about alienation,
12 you would agree with me that you've posted quite a bit
  of stuff about Nikki on Facebook, right?
14
             I have never mentioned Nikki on Facebook.
       Α.
15
            Have you talked about Nikki on Facebook?
       Ο.
             I have never mentioned Nikki on Facebook.
16
       Α.
17
                  MS. HAYES: Objection, nonresponsive.
18
       Q.
            Have you talked about Nikki on Facebook?
19
       Α.
            No.
20
       Q.
             Okay. So when you post pictures about
21 alienation on Facebook, who are you referring to?
22
       Α.
            Oh, my gosh. Five other fathers right now
23 that are going through the same thing, and we discuss
24 alienation.
25
                  (Exhibit 20 marked.)
```

```
1
             I'm going to show you what I've marked as
        Q.
  Deposition Exhibit 20.
3
             Yes. I didn't create this.
             Okay. So -- but you posted this:
4
        Ο.
5
                  A child will never reject a parent.
6
                  Only a child that was brainwashed and
7
                  conditioned by an adult will reject a
8
                  parent.
9
             Right?
10
       Α.
             Yes.
             And is that what you really believe?
11
        Q.
12
       Α.
             Yes.
13
        Q.
             You don't believe it's possible that a child
14 would ever reject a parent?
15
             I didn't say possible.
       Α.
             It says, A child will never --
16
        Ο.
17
             Mm-hmm.
       Α.
18
             -- reject a parent. That's an absolute,
       Q.
19 yeah?
20
             Yeah, this comes from a dads group online.
21
             Okay. And I'm just -- my question is -- is,
        0.
22 you say at the top, This is a simple truth, yes?
23
             Mm-hmm.
       Α.
24
             Okay. And were you referring to your
25 situation with your child?
```

```
No. I, matter of fact, speak to three or
1
       Α.
2 four other fathers about the same situations that
3 they're going through.
            Okay.
       Q.
5
            So when -- when I post those --
       Α.
6
                 MS. HAYES: Objection, nonresponsive
  after no.
8
       O.
            So if you'll turn to the second page.
9
            Mm-hmm.
       Α.
10
       0.
            Where it says:
11
                 Hang in there, son. Daddy will have you
12
                 home soon --
13
          Mm-hmm.
       Α.
14
       O. -- well, that's obviously referring to your
15 son, right? There's a picture of him.
16
       Α.
            Yes.
17
            Okay. And you weren't there to take this
       Q.
18 picture, right?
19
            No. I haven't been allowed to.
       Α.
20
                 MS. HAYES: Okay. Objection,
21 nonresponsive after no.
22
            In fact, Nikki took this first-day-of-school
       Q.
23 picture and sent it to you so you would have it,
24 right?
25
       Α.
            Yes.
```

```
And in return you posted it on Facebook with
1
       Q.
  alienation-is-family-abuse hashtag; isn't that right?
3
            Ma'am, I don't remember these two being
4 together.
5
            These are -- these are separate posts,
       0.
6 Mr. Crockett. The second page --
7
            Yeah, they are separate posts. You're
       Α.
8 acting like these were put together. I don't
9 believe -- so this was not put over the top of this
10 one.
11
            Understood.
                         These are --
       0.
12
       Α.
            These are -- these are separate posts.
                 MS. HAYES: Objection, nonresponsive.
13
14
       Ο.
            Yes, and I'm asking you about the second
15
  post --
16
       Α.
            Okay.
            -- that you put up. And I guess my question
17
18 to you is: When Ms. Ngo was nice enough to send you a
19 first-day-of-school picture of your son, you rewarded
20 her by posting it on Facebook and talking about how
21 alienation is family abuse; isn't that right?
22
            Ma'am, this has nothing to do about reaching
       Α.
23 out to Nikki Ngo Cottingham. I'm making --
24
                 MS. HAYES: Objection, nonresponsive.
25
       A. -- I'm making a statement.
```

Okay. You would agree with me, Nikki sent 1 Q. you this picture on the first day of school, right? 3 Mm-hmm. Α. Okay. And then you posted it and put this Ο. 5 hashtag: Alienation is family abuse. Right? 6 Α. Yes. 7 Okay. And were you referring to her when Ο. you put that on? 9 Α. No. I was just referring to fathers in 10 general. 11 Okay. So you were not concerned about 0. 12 alienation in this, when you posted this photograph? 13 Perjury is a crime, and alienation is Α. 14 family abuse. 15 Yeah. Q. 16 Α. Mm-hmm. 17 Why did you put that there? Q. Because I'm an advocate for fathers. 18 Α. 19 Okay. And you thought putting a picture of Ο. 20 your own son and putting those two posts was 21 appropriate? 22 Α. Yes. 23 Okay. And if we turn to the third picture Q. 24 where it says: 25 Is the woman who keeps her child from a

```
loving father,
1
2
            you posted this photograph on Facebook also,
3 right?
            Yes.
       Α.
5
       Ο.
            And down at the bottom you have a response
6
  and it says:
7
                  Well, when you're mentally ill, that's
8
                  what happens.
            Mm-hmm.
9
       Α.
10
       Ο.
             Is your implication that Nikki is mentally
11 ill?
12
       Α.
            Wasn't implying anything about Nikki.
13
            This -- this didn't have anything to do with
       Q.
14 Nikki?
            No. There's mental illness everywhere.
15
       Α.
16 did not mention Nikki and wasn't implying her.
17
            Okay. So you don't think Nikki has any
18 mental illness, right?
19
       Α.
             I'm not in a position to make a yes or a no
20 comment on that.
21
            Okay. Well, you've talked a lot about
       0.
22 alienation today, and I'm asking you for your opinion
23 about this. Do you believe Ms. Ngo has a mental
24 illness?
25
       Α.
            Yes, I -- I have some concerns.
```

```
1
            Okay. Is that why you're asking for a
       Q.
  psychological evaluation of her?
3
                  MS. LEWIS: Objection, form.
            Ma'am, Judge Moore asked for it.
4
       Α.
5
                  MS. HAYES: Objection, nonresponsive.
             You understand you filed a request for a
6
       Ο.
  psychological evaluation, right?
8
       Α.
            Yes.
9
            Okay. And are you asking for that because
       Q.
10 you have some mental health concerns for Ms. Ngo?
11
       Α.
            Yes.
12
       Ο.
            Okay. Now, you understand that the Court
13 ordered that Dr. Davidson perform that mental health
14 evaluation, right?
15
       Α.
            I am.
16
            Okay. And you understand that you've
17 previously already designated him as your expert in
18
  this case, right?
19
             I wasn't aware of that until just recently.
20
       Ο.
            Okay. So you would agree with me, it's not
21 appropriate for your expert to do a psychological
22 evaluation --
23
                  MS. LEWIS: Objection, form.
24
             -- of another party?
25
       Α.
            No, ma'am. I think you're -- you're totally
```

```
1 off center.
2
            Okay. Do you know the rules of procedure
3 and evidence, sir?
            No, ma'am, I don't.
       Α.
5
            Okay. And would it surprise you to learn
       0.
  that it precludes your own personal expert from being
  ordered to take --
8
       Α.
            I never asked --
9
            -- a psychological evaluation?
       Q.
10
            -- Dr. Davidson to be my expert. So if it
11 was -- I -- I had no idea. I can't answer the
12 question because I didn't ask.
13
       Q. Okay. Let me ask it a different way.
14
                  You designated Mr. Davidson as your
15
  expert in this case. Were you aware of that?
16
       Α.
            No.
17
            Okay. Now, Mr. -- well, before we move on,
       Ο.
18 I'm going to show you what I have marked as Exhibit 9.
19
                  (Exhibit 9 marked.)
20
                  Do you recognize that?
21
       Α.
            Yes.
22
            Okay. And this is where you posted about a
       Q.
23 book you were writing against the 256th District
24 Court; is that right?
25
       Α.
            Not against. This is a book that will be
```

```
1 written on the experience that I -- I've been through
2 and other fathers have been through, too. So this is
3 a suggested name of the book.
            You indicated that family court is nothing
5 but a $60 billion a year child scam; is that right?
6
       Α.
             I copied and pasted that from Dads -- or
7 Fathers -- I forgot. What is it? It's called Dads.
8
                  MS. HAYES: Objection, nonresponsive.
9
             So, yes, I copied and pasted that, yes.
       Α.
10
       Ο.
            Okay.
                  And hope my new book, "A Father's Hell
11
12
                  in the 256th," will be out by December.
13
             Is that right?
14
       Α.
            Yes.
15
            You didn't write that book, did you?
       Ο.
16
       Α.
             It's not written yet.
17
            Okay. But you're intending to write a book
       Q.
18 about Judge Lopez and the 2 -- your experience in the
19 256th?
20
             I -- I am planning on writing a book, yes.
21
            About your experience in the 256th, right?
       0.
22
            About my experience in family court.
       Α.
23
             Okay. And you reached out to the campaign
       Q.
24 rival, Sandre Streete; isn't that correct?
       Α.
25
             Yes.
```

```
Okay. And you offered to perform some
1
        Q.
2 services for her in order to support her in that
3 campaign; is that right?
       Α.
             Yes.
5
             Okay. And as a result of that, she told you
       Ο.
6 it was going to warrant her recusal in this case,
7 right?
8
             Only after upon meeting her.
9
             Okay. And she has explained to you, she is
        Q.
10 how going to recuse herself from this case as a result
11 of that, right?
12
             This is what she stated.
       Α.
13
             Okay. And you would agree with me that
        Q.
14 you've posted a litany of bad things on Facebook about
  Judge Lopez, right?
15
             A litany of things?
16
       Α.
17
             Mm-hmm.
       Q.
18
       Α.
             No.
19
             You've told many people that you were going
        Ο.
  to have him removed from the bench, right?
20
             I don't believe I said that.
21
       Α.
22
             You talked about how he was a fraud and
        Ο.
23 would constantly overturn Judge Moore, right?
             Never used the word "fraud."
24
        Α.
             Okay. You didn't use the word "fraud"?
25
        Ο.
```

```
I don't recall using the word "fraud."
1
       Α.
2
             Okay. Do you recall talking about how you
        Ο.
3 couldn't -- how much you disliked Judge Lopez?
             I think Judge Lopez's reputation speaks for
5 itself on social media without me adding to it too
6 much.
7
                  MS. HAYES: Objection, nonresponsive.
8
       Ο.
             Do you recall talk -- talking baldly about
  Judge Lopez on Facebook?
10
             I don't recall if I did or not.
       Α.
11
             Okay. You filed a motion to recuse him,
12 right?
13
       Α.
             Yes.
14
             Okay. And that was denied by the presiding
       Ο.
15 judge; is that correct?
16
       Α.
             Yes.
17
             You threatened Rochelle Ritzi and told her
        Q.
18 you were going to file a complaint against her, didn't
19 you?
20
       Α.
             No.
21
                  MS. LEWIS: Objection, form.
22
             You threatened Jennifer Frendle and told her
       Q.
23 you were going to file a complaint against her, didn't
24 you?
25
       Α.
             No.
```

```
MS. LEWIS: Objection, form.
1
2
            You threatened Ms. Alexander and indicated
       Ο.
  that you were going to file a complaint against her,
  didn't you?
5
                  MS. LEWIS: Objection, form.
6
                  MS. HAYES: What's your objection?
7
                  MS. LEWIS: Argumentive.
8
       Ο.
            Okay. You can answer.
            I asked Ms. Alexander for her resignation.
9
       Α.
10
                  MS. HAYES: Objection, nonresponsive.
11
            You've threatened to file a complaint
12 against three of the experts in this case, haven't
13 you?
14
       Α.
            No.
15
            Do you recall, when Jennifer Frendle came to
  testify in court, she had to bring extra security
17 because she was afraid you would hurt her?
18
       Α.
            That is not true.
19
            Okay. Do you recall that your picture was
       0.
  posted in the courthouse, and extra security was
  brought in when you were brought into the courtroom?
22
            No, ma'am. I've never heard of that before.
       Α.
23
            Do you recall Jennifer Frendle testifying to
       Q.
24 that when she was on the stand in this case?
25
       Α.
            Testifying to what?
```

Her fear of you and the -- the need for 1 Q. extra security. She didn't testify to that. 3 MS. HAYES: Objection, nonresponsive. 4 5 Α. No. 6 0. Isn't it true, Mr. Crockett, that every time you don't get what you want, you threaten the person? 8 Α. No. 9 MS. LEWIS: Objection, form. 10 Who's Frank Bonner? 11 Frank Bonner is someone I've known since we 12 were 13 years old. 13 Q. And he was going to be a witness in this 14 case, wasn't he? 15 In my behalf, yes. Α. 16 Okay. And at some point he had a 17 conversation with Nikki that upset you; isn't that 18 true? 19 I'm not sure if he did or what was actually 20 taking place. 21 I know that Frank is mentally impaired. 22 Your friend from childhood is mentally Q. 23 impaired? 24 Α. Yes. 25 Q. Okay. And he lived with you in your home,

```
1 didn't he?
2
            Yes. That's why I had to ask him to leave.
       Α.
3
       0.
            You -- you asked Frank to leave?
       Α.
            Yes.
5
            And you threatened him in this case and told
       Ο.
6 him that if he was a witness, you'd ruin his life;
7 isn't that true?
8
                 MS. LEWIS: Objection, form.
9
       Α.
            Mmmm...
            In fact, your exact words were, If you
10
11 testify in this case, I will ruin your life. Isn't
12 that true?
13
      A. I think, after he threatened to kill me,
14 yes.
15
                 MS. HAYES: Objection, nonresponsive
16 other than yes.
17
                 (Exhibit 16 marked.)
18
       Q. I'm showing you what I've marked as
19 Exhibit 16.
20
       Α.
          Yeah.
21
           Do you recall this statement?
       Ο.
22
            Yes, I recall this.
       Α.
23
            Okay. And you told -- you ended with, See
       Q.
24 you in court. Right?
25
       Α.
            Mm-hmm.
```

```
Okay. And you told him that you were going
1
       Q.
2 to bring charges against him with the Masons; is that
3 right?
            We discussed the Masons. Both he and I
       Α.
5
  were --
6
                 MS. HAYES: Objection, nonresponsive.
7
            Yes, yes.
       Α.
8
       Ο.
            You see that here?
9
       Α.
            Yes.
10
            Okay. And you testified earlier that you're
11 not a member of the Masons, nor have you ever been,
12 right?
            At that time I was entering the Masons and
13
       Α.
14 still had access to the Masons to be able to bring
15 this --
                 MS. HAYES: Objection, nonresponsive.
16
17
       Α.
            Yes.
18
            You testified earlier you have not been a
       Q.
19 member and are not a member of the Masons, right?
20
       Α.
            Correct.
21
            Okay. You indicated to him that you
  contacted the authorities. Did you actually do that?
22
23
       Α.
            Yes.
24
       Ο.
            Where -- who did you contact?
25
       Α.
            It was the chapter or the lodge. After he
```

```
1 threatened my life, I contacted the lodge. I believe
2 it was in Garland, but I don't remember the lodge
3 number.
            Okay. I'm talking about the authorities.
       0.
  Did you ever call the authorities, Mr. Crockett?
5
6
                  MS. LEWIS: Objection, form.
7
            Well, the authorities would be the Masons.
       Α.
8
       Ο.
            Okay.
9
            Authority -- authority of --
       Α.
10
            Did you contact the police at any time about
11 Mr. Bonner and file a report?
12
       Α.
             I spoke to an officer and -- and told them I
13 had concerns about Frank Bonner coming back over to my
14 house --
15
                  MS. HAYES: Objection, nonresponsive.
16
            -- after threatening me. Yes, I did call
17 the police.
18
            Okay. Did you file a police report on Frank
       Q.
19
  Bonner?
20
       Α.
            No.
21
            You indicate also:
       Ο.
22
                  I have five witnesses coming forward
23
                  plus your family members to talk about
24
                  your character and lies about me, not to
25
                  mention your cons.
```

```
1
             Do you see that?
2
       Α.
             Yes.
3
             Okay. And that was people that you had
        Ο.
  intended to bring in this case; isn't that true?
             And -- and in another case.
5
       Α.
6
       Ο.
             Okay. And you indicate --
7
             There were two cases.
       Α.
8
       Ο.
             And you indicated that he put Lauriston,
9
  presumably your son, in harm's way; is that right?
10
       Α.
             Yes.
11
             How did he do that?
        Ο.
             Frank was on two different medications.
12
       Α.
13 was also put in a psych ward two times.
14
                  MS. HAYES: Objection, nonresponsive.
15
             How did he put your son in danger?
       0.
             He was talking to Lauriston about Nikki.
16
17
             Okay. So your testimony is that Frank
        Ο.
18 Bonner was the one who talked to Lauriston about
19 Nikki?
20
       Α.
             Yes.
             And what did he tell the child about Nikki?
21
       0.
22
             He said that his mother was a liar.
       Α.
23
             Okay. Were you present for that
       Q.
24
  conversation?
             I walked in on the conversation.
25
       Α.
```

Okay. And what did you do in response? 1 Q. 2 I told Lauriston, I said, Hey, bud, let's go 3 play in the next room. And I told Frank we don't talk 4 like that. 5 Q. And so he put your son in danger by calling 6 Nikki a liar? 7 A. Frank was --8 MS. HAYES: Objection, nonresponsive. 9 Yes. No, no, not -- not because of that. Α. 10 There was other things that happened. 11 Okay. All I want to hear about is the 12 danger. Tell me, how was Lauriston in danger? A. Frank was on two psych meds. 13 14 MS. HAYES: Objection, nonresponsive. 15 I don't know how to answer other than, he Α. 16 was carrying a gun --17 Did he -- did he --Q. 18 -- carrying a gun around my home. 19 Okay. There we go. So he carried a gun 0. 20 around your home. 21 Do you know whether he had a gun 22 license? 23 I know that he did not. Α. 24 Q. Okay. And you carry guns around your home, 25 don't you?

Around my home? 1 Α. 2 Correct. Ο. No. They're in the safe. 3 Α. How many guns do you have? 4 Q. 5 Three pistols, two BB guns, and two rifles. Α. 6 Ο. You have two automatic -- semi-automatic weapons, yeah? 8 Α. Yes. 9 Okay. And those were a concern in the Q. 10 social study as well -- is that right -- the 11 semi-automatic weapons? 12 Α. I don't know why they were a concern. I'm a 13 licensed carrier. 14 Well, in fact, one of them, I quess it is an O. 15 automatic weapon you've actually created a trust for, 16 correct? 17 An automatic weapon, no, ma'am. Α. 18 Mm-hmm. And in fact, that's how you know Q. 19 Mr. Macfarlane. Isn't that correct, that you guys are 20 in the same gun club? 21 Α. No. 22 Okay. How did you meet Dr. Macfarlane? Q. 23 He's an LPC. Α. 24 Ο. Okay. And are you in the same gun club?

I don't know that he's in a gun club.

25

Α.

```
MS. HAYES: Objection, nonresponsive.
1
2
             Are you in a gun club together?
       0.
3
       Α.
             No.
             Are you in any club together?
4
       0.
5
       Α.
             No.
6
       Ο.
             You're in no memberships together?
7
             No. He's my LPC.
       Α.
8
       Ο.
             Okay. And did you -- how did you -- how did
  you discover him?
             I actually just went on the Web and looked
10
11 up LPC, because I was given an order by Judge Moore to
  seek counseling for anxiety or anger.
13
             And did you complete counseling with him?
        Q.
14
             I'm still seeing him.
       Α.
             You still see Mr. Macfar- -- Dr. Macfarlane?
15
       Ο.
             He's not a doctor. He's an LPC.
16
       Α.
17
             Okay. And you're still seeing him?
       Q.
18
       Α.
             I do.
19
       0.
             How frequently?
20
             Anywhere from two to three times a month.
       Α.
21
             Okay. And you were ordered to turn over
        Ο.
  those counseling records, and you have failed to turn
23 over any counseling records since 2018; isn't that
24 true?
25
       Α.
            No, ma'am.
```

```
You've turned over your counseling records?
1
        Q.
2
            First of all, I didn't know they were re- --
       Α.
3 were -- they were requested, number one. And number
4 two, if there's any documentation, I've already signed
  it with Dr. Ritzi and Forrest and anyone else that I
6 need to sign any documentation to release that.
7
            Who is Forrest?
       Ο.
8
            Forrest Macfarlane.
9
            Forrest Macfarlane, okay. And are you --
       Q.
10 you guys are in the same -- excuse me. You're both
11 members of the same gun trust, are you not?
12
            No. I don't --
       Α.
13
            Okay.
       Q.
14
       Α.
            -- understand your question.
15
            Okay. Fair enough. I'll talk to him about
       Q.
16 lit.
17
       Α.
            Okay.
18
            Do you still participate or work with the
       Q.
19
  FBI?
20
             I've never worked with the FBI.
       Α.
21
            Why did you tell Kristi -- or Jennifer
        Ο.
  Frendle that you were an informant for the FBI?
22
23
             I did not.
       Α.
24
            What role did you tell her you had with the
25 FBI?
```

```
I did not ever mention the FBI.
1
       Α.
2
        Ο.
             Okay. Do you work with other police
3 agencies?
             I have worked with other agencies in the
       Α.
5
  past.
6
        Ο.
             In what capacity?
7
             I worked with the DEA.
       Α.
8
        Ο.
             And what -- what did you do for the DEA?
9
       Α.
             I was a paid informant.
10
       Ο.
             And what years were you a paid informant?
11
             '83 to '84, if I recall correctly.
       Α.
12
        Ο.
             Okay. And have you had any interactions
13 with the DEA since 1984?
14
       Α.
             No.
15
             What name were you using in 1983 or 1984?
       Q.
             Lauriston Crockett.
16
       Α.
17
             The Third?
       Q.
18
       Α.
             Yes.
19
             Okay. Currently are you enjoying -- well,
        Ο.
  do you like Dr. Frye?
21
       Α.
             Do I like Dr. Frye?
22
             Mm-hmm.
       Q.
23
             I think she's extremely informative.
       Α.
24
       Ο.
             Okay. Did you like her when you first met
25 her?
```

```
1
             I -- I suppose.
       Α.
2
            Well, you didn't want a different
3 reunification counselor when Dr. Frye came into the
4 picture?
5
       Α.
            No. I -- I found her very enlightening.
6
       Ο.
            Okay. Did it surprise you to learn that
7 Logan reported to Dr. Ritzi that you and Dr. Frye
  presented an order to him in session?
9
       Α.
            Am I surprised? No.
            Why aren't you surprised that your son would
10
11 tell his counselor that you showed him the court
12 orders?
13
            Because the child is alienated.
       Α.
14
            You think Dr. Ritzi is somehow in a
       Ο.
  conspiracy to assist in alienation of this child?
15
             I think we can refer back to the --
16
17
                  MS. HAYES: Objection, nonresponsive.
18
       Α.
            -- email.
19
                 Do I think that she -- ask the question
20 again, please.
21
            Sure. Do you think that Dr. Ritzi is
       Ο.
  some -- in some sort of conspiracy to alienate your
23 child from you?
24
            I think Dr. Ritzi has her own opinions.
25
                 MS. HAYES: Objection, nonresponsive.
```

1 Q. It's a yes-or-no question. 2 Α. Yes. Okay. So when Dr. Ritzi -- so there's no 3 Ο. 4 notes or sessions of notes that you would believe from Dr. Ritzi; is that correct? 6 Α. I would question them. 7 Okay. So if Dr. Ritzi is saying, Logan is Ο. telling me one thing completely different, you won't -- you don't believe her; is that right? 10 That she said that Lauriston told her that? Α. 11 Ο. Correct. 12 Α. An alienated child, yes, I would -- I could 13 believe that could happen. 14 MS. HAYES: Objection, nonresponsive 15 other than yes. 16 Does it cross your mind that maybe Lauriston 17 is playing both sides of this case? 18 Α. I've been told that he is. 19 You've been told by whom? 20 Α. Dr. Linda Threats, Forrest Macfarlane; and I 21 believe that Dr. Frye and I had a discussion about 22 alienated children. And when they feel like they're 23 put in the middle, they can take on that role. 24 Okay. So you -- so let me understand this. 25 If you believe that Lauriston is playing both sides of

```
1 you and Nikki, why is it so hard for you to believe
  that he would say these things to Dr. Ritzi?
             I -- I just told you I'm not surprised.
3
       Ο.
            Okay. Maybe I misunderstood. I apologize
  for that.
5
6
       Α.
            And could we -- I'm sorry, I drank too much
7 water. Can we take a two-minute break, please?
8
       Ο.
            Give me just -- let me get through the end
  of this --
9
10
       Α.
            Okay.
            -- and then, absolutely.
11
       0.
12
                  So currently do you believe it's
13 possible that Logan, or Lauriston, is going back to
14 his mom and telling her, I don't want to see my dad;
15 please help me?
16
            I don't know.
            Do you think it's possible?
17
18
            I think anything is possible. But I -- I
       Α.
19 don't have that knowledge, and nothing's been
20 presented to me by that.
21
            Don't you think it would have been prudent
       0.
22 for you and Nikki to have that conversation so that
23 Lauriston wouldn't be capable of playing y'all against
24 each other?
25
       A.
            Well, there's no having a conversation with
```

```
1 Nikki.
2
            Okay. Because when you refer to Nikki, you
       Ο.
  blame her for everything the child says; isn't that
  true?
4
5
       Α.
            No.
6
       Ο.
            You can take your break.
7
       Α.
            Thank you.
8
                  THE VIDEOGRAPHER: We're off record at
9 3:30 p.m.
10
                  (Recess from 3:30 p.m. to 3:40 p.m.)
11
                  THE VIDEOGRAPHER: We're back on record
12 at 3:40 p.m.
13
            Okay. Mr. Crockett, when we left off before
       Q.
14 break, we were talking about the possibility that
15 maybe the child was kind of playing both sides against
16 each other. You indicated that Macfarlane,
17 Dr. Macfarlane, also thought the child was doing that;
18 is that right?
19
       Α.
            Can you please ask that again?
20
                  And a -- Forrest is an LPC. He's not a
21 doctor.
22
            I'm sorry. You've told me that twice, and
       Q.
23 I'll -- I'll make a note so I don't make that mistake
24 again.
25
                  My question is, you've indicated that
```

```
1 Macfarlane was one of the people that told you that
2 the child might potentially be playing both sides
3 against each other; is that right?
            He -- in a session we discussed that
  children could do that.
5
6
       Ο.
            Okay. Has he ever met your son?
7
       Α.
            No.
8
       Ο.
            Now, and Dr. Frye -- have you and Dr. Frye
9 discussed the possibility that this child may be
10 playing both sides?
11
       Α.
            No.
12
       Ο.
            Have you -- do you have concerns that the
13 child might be playing both sides?
14
            From what -- from what I've been taught,
       Α.
15 then I would -- I would say there could be a
16 possibility.
17
       Q. Okay. When you -- when you were in session
18 with Logan and the orders came up regarding this case,
19 did you have a physical copy of the orders with you?
20
       Α.
            No.
21
            Have you ever showed a physical copy of the
       Ο.
22 orders to the child?
23
       Α.
            No.
            Did you and Dr. Frye discuss that court
24
25 order and what's contained in it with the child?
```

```
No. Lauriston discussed it.
1
       Α.
2
            Okay. When you say Lauriston discussed it,
3 what does that mean; what did he say?
            You're a bad person. Well, the conversation
  started off -- we thought it would be a happy moment.
6 It was --
7
                 MS. HAYES: Objection, nonresponsive.
8
       Ο.
            Just what did Lauriston say as it pertains
  to the court order in session with --
10
       Α.
            Oh.
            -- Dr. Frye?
11
       Ο.
12
       Α.
            He had complete knowledge of jury trials.
13 We're going to jury trial. Why am I dragging his
14 mother and Rob back into a jury trial? You ran over
15 my mother. You're a horrible person. You shouldn't
16 be having children. And what is a jury trial?
17
                 And -- and I stood up and looked at
18 Dr. Frye for direction. I said, Son -- and I looked
19 at Dr. Frye, and she took over the conversation.
20
       Q.
            Okay. And that was in August of 2022,
21 right?
22
            I -- I believe so.
       Α.
23
            Okay. And that was at the end of your time
       Q.
24 with Dr. Frye?
25
       Α.
            Well, it was at the end -- it was one of the
```

```
1 last times that Nikki brought Lauriston to Dr. Frye.
2
       Ο.
            Okay. And you told this Court earlier today
3 that your relationship with Lauriston had so greatly
4 improved that he was running and jumping into your
  arms and kissing you. Do you remember that?
6
       Α.
            Yes, yes.
7
            But at the same session, he was telling that
8 you -- that you're a horrible person because of these
  court orders?
            At the end of the session, he was back --
10
       Α.
11 well, he -- I left some things out.
12
                 MS. HAYES: Objection, nonresponsive.
13
       Q.
            It's just a yes or no.
            To the -- at the end of the -- that
14
       Α.
15 relation -- that meeting that time --
16
       O.
            Mm-hmm.
            -- yes, he was back in my arms. Daddy, I
17
       Α.
18 love you. Yes, I do want to have a little brother.
19 want to teach him how to read and write. Dr.
20
                  MS. HAYES: Objection, nonresponsive --
21
             -- Frye was able to switch --
       Α.
22
                  MS. HAYES: -- after yes.
23
             So just to be clear, he would show up at the
24 session upset with you. And then your testimony is
25 that you guys would work that out in session?
```

That session? 1 Α. 2 Ο. Correct. 3 Α. Yes. Okay. And in that court order that you have there in front of you, there's no mention of jury 5 6 trial, is there? 7 Α. No. 8 0. Okay. The court order only discusses possession and access; is that right? And -- and 10 counseling for you; is that right? 11 Which -- which one? We've had so many. 12 Ο. The court -- the court order that we have 13 here today. 14 MS. LEWIS: We have more than one. 15 Α. There's been more than one, so which one are 16 you talking about? 17 The only AJ report -- the only court order Q. 18 we have today is the --19 The last one that was issued? Α. 20 Q. -- the August, mm-hmm --21 Okay. Α. 22 -- of '19. Q. 23 Α. Well, that came after that meeting, so --24 Ο. Okay. 25 MS. LEWIS: We have Exhibit 1 here,

```
too.
1
2
                  MS. HAYES: Oh, you're right. Okay.
3 My apologies.
            It's the associate judge's report from
5 August of 2019 where you were given supervised access.
6 Did you have a copy of that court order with you in
7 that session?
8
       Α.
            No.
9
            Did you discuss the terms of that court
       Q.
10 order with the child in that session?
11
       Α.
            No.
12
       Ο.
            Did you and the child discuss where you
13 could and could not have access with the child in that
14 session?
15
       Α.
            No.
16
       Ο.
            What did the child tell you about where you
17 could or could not have access during that session?
18
       Α.
            We -- I don't believe we discussed that.
19
                  (Exhibit 22 marked.)
20
       Q.
            Okay. So I'm showing you Deposition
21 Exhibit 22.
22
                  MS. HAYES: Oh, crud. Sorry, y'all.
23
                  MS. LEWIS:
                              No worries.
24
                  MS. HAYES: I should have stapled these
25 instead of -- we have a back page as well.
```

```
And Dr. Ritzi testified regarding statements
1
       Q.
  the child made in session regarding this court order.
  Do you recall that?
            Yes. I remember the ruling on that, too.
5
                 MS. HAYES: Objection, nonresponsive
6
  after yes.
7
       Α.
            Yes.
8
            And he indicated you and Dr. Frye confronted
  him about the court order. But it's your testimony
10 that that's not true, right?
11
            That was not true.
12
       Ο.
            Okay. Do you think it's a possibility that
13 he went to Dr. Ritzi and said that you did it anyway?
14
            That would be hearsay testimony. I -- I
       Α.
15 have no idea.
                 MS. HAYES: Objection, nonresponsive.
16
17
            I have no idea. I don't know.
18
            Okay. This is a child that you tell me you
       Q.
19 now have a wonderful relationship with as a result of
20 your twelve sessions --
21
       Α.
           Mm-hmm.
22
            -- in reunification therapy. And you're
       Ο.
23 telling me you don't know if he's the kind of child
24 that would go and tell lies about you. Is that your
25 testimony?
```

Α. Yes. 1 Okay. In fact, he -- she -- he said: 2 Ο. 3 Do you know if Dr. Frye is lying, or did my dad trick her? My dad swore to me he 4 5 wasn't lying. But if he wasn't lying, 6 my mom and Rob would be in trouble. 7 MS. LEWIS: Objection, form. 8 MS. HAYES: What's your objection? 9 MS. LEWIS: So were you saying that he 10 said that to Lauriston? 11 MS. HAYES: I'm just reading directly 12 from the document that's now in evidence. 13 MS. LEWIS: So your -- your question is 14 whether he said that to Dr. Ritzi? 15 MS. HAYES: I haven't gotten to my 16 question yet. 17 MS. LEWIS: Okay. 18 Q. So: 19 My dad swore to me he wasn't lying. But 20 if he wasn't lying, my mom and Rob would 21 be in trouble. 22 Did you hear that? I heard what you just read. 23 24 Okay. Do you know what he's referring to in 25 this statement?

```
1
             I believe I do. Could you please read that
       Α.
  to me again?
3
       0.
            Sure.
                  My dad swore to me he wasn't lying. But
 4
5
                  if he wasn't lying, then my mom and Rob
6
                  would be in trouble.
7
             Do you remember a conversation with your son
  in session on July the 12th where you talked about
9 lying?
10
       Α.
            Not about lying.
11
       Q.
            Okay.
            But Lauriston said --
12
       Α.
13
                  MS. HAYES: Objection, nonresponsive
14 after, Not about lying.
15
            I thought you asking me what the child asked
16 during the session.
17
            Lauriston then went on to tell Dr. Ritzi:
       0.
18
                  I wish you could do the reunification
19
                  therapy, but I think my dad hates you.
20
            Have you ever told the child that you hated
  Dr. Ritzi?
21
22
            No. No. As a matter of fact, the opposite.
       Α.
23
            But you don't like her, right? You told us
24 here today that you don't like her, right?
25
       Α.
            I think Dr. Ritzi is --
```

```
MS. HAYES: Objection, nonresponsive.
1
2
            You don't like Dr. Ritzi, do you?
       Ο.
             I'm -- I'm not favorable for her, no.
3
            Right. And do you think it's just a
  coincidence that your son happens to know you don't
5
6 like her?
7
            He is the one who told me.
8
       Ο.
            He told you that you don't like her?
            He told me that Dr. Ritzi didn't like me.
9
       Α.
10 I've never reciprocated in any way any feelings that I
11 have towards her at all.
12
       Ο.
            Okay. So it is just a coincidence that he
13 thinks that you don't like her; you haven't told him
14 that?
15
            Well, ma'am, matter of fact, I told her that
16 she was on an email and said hello to me and was very
17 hice. The last conversation we ever had about
18 Dr. Ritzi --
19
                  MS. HAYES: Objection, nonresponsive.
20
       Q.
               Dr. Frye said your dad is telling you
21
                  the truth about everything.
22
            Did that happen in session? Did Dr. Frye
23
  say that in session?
24
            About everything? No.
25
               I was confused, but now I'm mad; and
       Ο.
```

```
he's messing with my head, referring to
1
2
                  his father.
3
            Does it concern you that the child thinks
  you're messing with his head?
            I think the child is confused.
5
       Α.
6
       Ο.
            Have you addressed that statement with him?
7
             I -- this is the first time I've heard it.
8
       Ο.
            Okay. Well, you -- you ha- -- you had these
  records admitted --
10
       Α.
             T --
            -- in court at the last hearing. Did you
11
12 have an opportunity to review them?
            No, ma'am. I've never seen these before.
13
       Α.
14
       Ο.
            Okay. And also, you've told us several
15 times here today how excited you think Logan is to be
16 a big brother; is that right?
17
            This is what he's told me.
       Α.
18
            Okay. Would it surprise you that he tells
       Q.
19 other people different things?
20
            Again that would show a child that's pretty
21 confused.
22
            Okay. Could it possibly just show a child
       0.
23 that just wants to tell you what you want to hear so
24 that you'll be happy with him?
25
       Α.
            Maybe he's doing that to all of us.
```

```
1
                  MS. HAYES: Objection, nonresponsive.
2
       Ο.
            Is that a yes?
3
            Ask your question again.
            Sure. Could that just be an indication the
       Ο.
  child is telling you what you want to hear so that
6 you'll be happy with him?
7
            No, I disagree because of the way he holds
       Α.
8 his brother and loves him and he kisses him and holds
9 on to him and wants to help changing his diaper and
10 feeding him a bottle. His --
11
                  MS. HAYES: Objection, non- --
12
       Α.
             -- his actions speak louder --
13
                  MS. HAYES: Objection, non- --
14
             -- than -- than words.
       Α.
15
                  MS. HAYES -- nonresponsive after, I
16 disagree.
17
            So in your heart of hearts, you believe
18 Logan really wanted to be a big brother?
19
       Α.
            Yes.
20
            Did you think he wanted to be a big brother
21 before you had this child?
22
            Since the time he was five.
       Α.
23
            Is that a yes?
       Q.
24
       Α.
            Yes.
25
            Is that why you went off and had a child
       0.
```

```
1 with this woman, because you wanted to try to convince
2 your son to come back to you?
3
                  MS. LEWIS: Objection, form.
             I find that insulting.
4
       Α.
5
                  MS. HAYES: Objection, nonresponsive.
6
       Ο.
            Was it a plan for you to have this child --
7
       Α.
            No, this was not a plan.
8
       Ο.
             -- as another effort to manipulate your son?
9
            No, this was not planned.
       Α.
10
            Do you know that he has referred to other
11 people, including Dr. Ritzi, that it's gross that you
12 have a young son?
             I've never heard that before.
13
       Α.
14
            Okay. Is it concerning to you that the
15
  child has reported that he feels like you like this
16 new child more than you've ever liked him?
17
                  MS. HAYES: Sorry.
18
            Could you ask the question again?
       Α.
19
             Sure. Is it concerning to you that your son
        Ο.
20 has reported to his counselor that he is afraid or --
  or sad that you might like this new child more than
22 you ever liked him?
             I think that's -- I think that's normal.
23
       Α.
            You think that's normal behavior?
24
       0.
             I've been told that that's normal behavior.
25
       Α.
```

- 1 Q. Okay. And --
- A. This is above my pay scale, though. I've just been told this.
- Q. Do you think since the baby has been born, that you've tried to do other things with Logan, other than talk about the baby?
- 7 A. Yes.
- Q. Okay. And -- and what -- what things have you taken Logan to do with just you and him and a supervisor other than be around the baby?
- A. Well, we haven't been able to go anywhere.

 But at home, racing boats in the pool, playing

 foosball, playing virtual reality Beat Saver, playing

 billiards, playing on the slot machine.
- Q. Are all these things at your house?
- 16 A. Yes.
- Q. Okay. And what is your understanding of the order right now about your possession with your son?
- A. My understanding is, I am under supervised visitation. I have to complete three in a row, which I have completed. And after the fourth one, at the end of this month, starting in December I get to be able to pick him up on Wednesdays or Thursdays, what other -- what doesn't interfere with hockey, for three hours, from 5:00 to 8:00.

```
1
                 And then I get to pick him up on
2 Saturday and Sunday, which does -- either Saturday or
3 Sunday, if his hockey is not involved, from 12:00 to
4 6:00. And we're unsupervised; we can go do anything
5 we want.
6
                 And then starting January 1st, first,
7 third, and fifth weekend and every Wednesday or
8 Thursday where hockey is not involved, I can pick him
9 up and --
10
       Ο.
            What --
            -- take him to dinner or whatever.
11
       Α.
            Sorry. What -- what is --
12
       Ο.
            Standard visitation, I believe it's called.
13
       Α.
14
       Ο.
            What is your understanding of right now
15 where you can -- where you can have your access, what
16 locations?
17
       A. It's not up to me. It's up to B & E who
18 makes this. So we could be at the B & E facility, or
19 we can be wherever B & E wants to have the meeting
20 between Lauriston and I getting together and spending
21 time.
22
            So how many vis- -- you've indicated you've
       Q.
23 now had three visits with your son under this current
24 order; is that right?
       Α.
25
            Well, technically, only two. The court
```

```
1 order states that if the child is not presented on my
2 day of possession, that it would still count as one of
3 the days. So because he wasn't presented to me on
4 Saturday or Sunday, then it still count -- so right
5 now we're at three. And this next weekend will be our
6 fourth, for completion.
7
            So it's your belief that even though you
       0.
  didn't actually have a visit, that it should count as
9 a visit?
10
       Α.
            This is what Judge Moore wrote in her order.
11
                 MS. HAYES: Objection, nonresponsive.
12
       Α.
            Yes.
13
       Q.
            Okay. And so -- but it's your understanding
14 that B & E gets to decide the location of these visits
15
  currently?
16
       Α.
            Yes.
            And where have all these visits -- where has
17
       Ο.
18 B & E chosen to have these visits?
            At home.
19
       Α.
20
       0.
            At your home?
21
            In my home.
       Α.
22
       Q.
            Okay. And have you inquired with B & E
23 about taking the child anyplace else other than your
24 home?
25
       A. We've discussed it. But Anna says that he's
```

```
1 having so much fun right now that, in her opinion,
  that my home is the perfect place for us to be.
3
            Okay. And when did you have this
       0.
4 conversation with Anna?
5
            I would probably say at the -- at the end of
6
  the first visit.
7
            Okay. And since that time, you've seen her
       Ο.
  one other occasion to supervise?
9
       Α.
            Yes.
            Before I forget, did you execute a release
10
11 of information with Dr. Frye?
12
       Α.
            To the best of my knowledge, yes.
13
       Q.
            Did Dr. Frye ask you to sign a release
14 regarding your visits in session?
15
            I believe Dr. Frye had me sign a release of
       Α.
16 everything in the very beginning. I don't recall.
17 But to -- to the best of my memory, I thought I signed
18 every document that she gave me from the beginning;
19 and I thought that was one of them.
20
       Ο.
            Okay. Do you recall whether she asked you
  to release information to the child's counselor and to
  the amicus attorneys?
22
23
             I don't recall.
       Α.
24
            Okay. Would you -- would you have any
25 opposition to that information being released to the
```

```
amicus attorney and the child's counselor?
2
       Α.
             No.
3
             Okay. If things are going so well in
        Ο.
  session, you would agree it would be helpful for them
  to know that information, right?
5
6
       Α.
             Yes.
7
             And do you have any objection to releasing
  this information to Nikki?
9
             Not at all.
       Α.
10
             You believe it might be helpful for y'all's
11 relationship if she knew that things were improving in
12 session?
13
             I would believe so.
       Α.
14
             Okay. And you understand that kind of
        Ο.
15 complete and utter transparency right now might be
16 helpful to everyone to determine if the child is
17 playing both sides, right?
18
       Α.
             I don't have enough knowledge. I -- I would
  say I would hope so, yes.
19
20
       Q.
             Okay.
21
             I mean, getting down to the truth, yes.
22
             Isn't it true that over this last year and a
        Ο.
23 half, Nikki has encouraged you to attend Logan's
24 practices?
25
       Α.
             No.
```

```
Other than the two games that you attended
1
       Q.
2 for Logan, the two hockey games, why didn't you attend
  the others?
            Well, I attend -- Dr. Frye -- well, first of
       Α.
5 all, Lauriston told me that I could not come. Because
6 I questioned him, asked him, because I wanted to come
7 see him and also see him practice.
8
                  He says, No, you cannot come.
9
                  And I said, Why?
                  He said, Because you're not safe.
10
11
                  I go, You're worried about Daddy's
12 safety?
13
                 He goes, No. You're not safe.
14
                  I said, Well, why would you say that?
15
                  He goes, Because my mama told me, and
16 she's the only one that tells the truth.
17
                 MS. HAYES: Objection, nonresponsive
18 after, the child told me I could not come.
19
            Okay. Secondly, the -- Dr. Frye told me,
  I -- I want you to go to a hockey game.
21
                  And I said, Sure, I'll -- I'll go.
22
                  So again for -- for my own safety, I
23 took Chris Graissaffe and Tom Lima with me. And we
24 sat there, and Lauriston apparently didn't see us in
25 the stands. But when I spoke to him on a Tuesday
```

```
1 night and he was talking about the game, I said, I
2 know. You were --
3
                  MS. HAYES: Objection, nonresponsive.
4
       Α.
             -- amazing.
5
                  MS. HAYES: Objection, narrative.
6
       Ο.
             At this point -- well, let me back up.
7
                  Who is Tom Lima?
8
       Α.
             A friend of mine.
9
             I mean, are -- do y'all work together?
       Q.
10
       Α.
             Yes.
11
             And does he work for Genostim, or does he
12 work for another company?
13
       Α.
             Both.
14
             Okay. What company does he work for other
  than Genostim; do you know?
15
            He works for attorneys. He does -- working
16
17 with attorneys, he does digital videos of people that
18 have been hurt in accidents. I believe that's what he
19 does for them.
20
       Q.
             Okay.
21
             I -- you know, I don't -- I know other
22 people -- he has his own business that does that.
23
             And you've designated him as a person with
24 ownership interest in Genostim; is that right?
25
       Α.
             No.
```

1 Is he a person with ownership interest in Q. Genostim? 3 I can't give that information. Α. You -- you don't know? Do you know? 4 0. 5 I do. I'm not --Α. Well, you indicated earlier he works for 6 Ο. Genostim, right? 8 Α. Mm-hmm. 9 Is that a yes? Q. 10 You -- you're asking me if I ga- --11 allocated him ownership, and I can't give that 12 information. Well, do you remember previously testifying 13 Q. 14 in this case that you had assigned your interest to 15 Tom Lima? I don't recall that. 16 17 Okay. But your relationship with Tom is Q. that you're just friends. Is that your testimony? 18 19 We are friends. Α. 20 Ο. Okay. And he has appeared in court throughout this case as an agent for Genostim; isn't 22 that true? 23 Throughout this whole case? Α. 24 Ο. Correct. No, ma'am. In another case when Nikki was 25 Α.

```
1 stealing information from the corporation and --
2
                  MS. HAYES: Objection, nonresponsive
3 after no.
            Do you recall Tom Lima coming to hearings in
       Ο.
5
  this case?
6
       Α.
            I believe Tom has shown up as -- as -- as
  support.
8
       Q.
            Okay.
9
       Α.
            Emotional support.
10
       Ο.
            And you brought him to your son's hockey
11 game; is that right?
12
       Α.
            Yes.
13
            And that -- he was your protection; is that
       Q.
14 right?
15
            Say my protection apart of being harmed, but
16 protection making sure that false allegations weren't
17 made against me again.
18
       Q.
            Have you and Mr. Lima ever been involved in
  anything more than a friendship?
20
             I don't understand the question.
       Α.
21
            Have you ever been involved romantically?
       Ο.
22
       Α.
            No.
23
            Okay. Do -- have y'all lived together at
       Q.
24 some point in time?
25
       Α.
            No.
```

```
1
            Did he rent a room or stay at your house for
       Q.
  an extended period of time?
            Tom Lima is married and has children.
3
4
       Ο.
            Okay.
5
                  (Exhibit 7 marked.)
6
                  I'm going to show you what I've marked
7 as Deposition Exhibit 7. Do you recognize this?
8
       Α.
            Yes. I don't remember when this was taken,
  though; but I remember taking pictures.
10
       Q. Okay. Well, you've only been to two games,
11 so can you recall whether these pictures were taken at
12 the first or second time?
13
            This was taken out at Valley R- -- this was
       Α.
14 taken out -- no, it was the old rink that he -- he
15 played at. It's not Grand Prairie. It's Farmers
16 Branch. To the best of my knowledge, only having --
17 looking at this picture of the rink --
18
       Q.
            Mm-hmm?
19
            -- I think this is where this was taken.
       Α.
20
       Ο.
            Okay. Have you attended any of his
  practices in the last two weeks?
21
22
            No. I haven't been allowed to.
       Α.
23
            And why do you say you're not allowed to?
       Q.
24
            Because it makes Lauriston extremely angry,
25 and he told me I'm not allowed to.
```

1 Okay. Well, we can both agree in this room Q. that an 11-year-old boy doesn't make the rules, right? 3 Α. Yes. Okay. And did you ask your son why he --Ο. you weren't allowed to? 5 6 Α. I have in the past. 7 Okay. And you indicated that it makes your Ο. son very angry. Does he tell you that it makes him angry when you come to his games? He told me that his mother told me I wasn't 10 11 allowed to come, and so she --12 MS. HAYES: Objection, nonresponsive. The question was, does your son tell you it 13 Q. 14 makes him angry when you come to his games? 15 He only told me the one time when he found Α. 16 out I was there in the stands that he was mad at me 17 and -- since I can't do what I'm suppo- -- what I'm told to do. And then he hung up on me. 18 19 Okay. Well, you said that you went to a Ο. game last week or the week before, right? 21 Uh-huh, the week before last. Α. 22 Q. Okay. And how many games has your son had 23 in the last two weeks? 24 To the best of my knowledge, he's had one 25 game and one tournament.

```
1
            Okay. And the tournament that you're
       Q.
  referring to is the one in Tennessee?
3
       Α.
            Yes.
                              I'm going to stop for a
                 MS. HAYES:
5
  second. Do you need to switch?
6
                 MS. LEWIS: Mm-hmm.
7
                 MS. HAYES: Okay, let's go off the
8
  record for a second.
9
                 THE VIDEOGRAPHER: We're off the record
10 at 4:03 p.m.
11
                  (Recess from 4:03 p.m. to 4:12 p.m.)
12
                  (REPORTER'S NOTE: At this time Brian
13 Bagley appeared for the witness, and Ms. Lewis left
14 the conference room.)
15
                 THE VIDEOGRAPHER: We're back on record
16 at 4:12 p.m.
17
                 MS. HAYES: Thank you.
18
            Okay. And, Mr. Crockett, when we took a
       Q.
19 break, we were talking about your son's hockey
20 schedule for the last two weeks. And you indicated
21 you believe he's only had one game and one tournament
22 in the last two weeks; is that correct?
23
            To the best of my knowledge, in getting the
       Α.
24 wrong schedule and doing our own research, this is
25 what -- only knowledge that I have.
```

```
And would you agree with me, you now have
1
       Q.
  received an updated schedule that purports --
3
       Α.
            No.
            You -- you haven't received an updated
       0.
5
  schedule for the child?
6
       Α.
            No.
7
            Okay. Were you aware if -- whether or not
       Ο.
  Anna received an updated schedule?
            You would have to ask her.
9
       Α.
            Okay. But your testimony is that neither
10
11 Anna nor Nikki has given you one; is that right?
12
       Α.
            At this time, yes.
13
            Okay. Do you have any idea about the
       Q.
14 win/loss record for Logan's team is?
15
            I just looked at it a couple of days ago, if
       Α.
16 it's the right schedule. Because I was given the
17 wrong schedule. And I think they've had one draw and
18 approximately maybe two wins; and the other are
19 losses, I believe.
20
       Ο.
            Are you --
21
            But this is -- I don't even know if I'm
       Α.
22 looking at the right schedule.
23
       Q.
            Okay. Are you familiar with what LiveBarn
24 is?
25
       Α.
            Yes.
```

1 And you can watch your son's hockey games on Q. LiveBarn? 3 Α. I have. Okay. And how many have you watched on Ο. 5 LiveBarn? 6 Α. Oh, probably a good five. Nikki would text 7 me, and -- and we'd comment back and forth while the game was going on. So you -- five games in -- over what period Q. 10 of time? 11 Well, that was last year. 12 Ο. Okay. Have you watched any games on 13 LiveBarn this year? 14 No. I didn't know if he was -- still could Α. 15 play on LiveBarn this year. I wasn't informed about 16 it. Well, you're aware of what team he's on. 17 Q. 18 You told us earlier about it, right? 19 Yes, but I -- I don't -- I'm not a hockey Α. 20 player, so I don't know if his team is being 21 broadcasted by LiveBarn. 22 Q. Well, isn't it true that on Our Family 23 Wizard in the last two weeks, she's indicated to you 24 that you can watch the games on LiveBarn? Right? 25 A. Not that I recall. I can go back and look,

```
1 but...
            Okay. But fair to say, you haven't watched
       Ο.
3 any games this year for your son other than the one
4 that you reported earlier; is that right?
5
            Well, no, because I just thought the season
6 just barely started. So the -- the answer is, no, I
7 wasn't aware of them.
8
                MS. HAYES: Objection, nonresponsive
9 after no.
10
       Q. And do you know how many goals your son has
11 scored this season?
12
            If I'm correct, he's had four assists and
13 one goal.
14
            And when did you last talk to him about his
       Ο.
15 record in hockey this season?
            Our last conversation.
16
17
            And when was that, last week?
       Q.
18
       Α.
           Mm-hmm, Tuesday. We talk about hockey every
19 Tuesday.
20
       Q. And this weekend did you tell him about the
21 games that you've watched and that you're following
22 his schedule?
23
            This last weekend?
       Α.
            I'm sorry. The last period of possession
24
25 that you had. Forgive me.
```

```
Yeah, we -- we discussed the game I was -- I
1
       Α.
  was at the time before and how fast he was and --
3
            And is --
       Ο.
             -- what a great defense man he is.
5
             Is that the game where he was upset you
6 didn't tell him that you were there?
7
            No. That happened last year.
       Α.
8
       Ο.
            Okay. So just so I'm clear for the
9 record -- I don't think I've made it clear -- you've
10 attended two games. One was this season, just last
11 week --
12
            Week before last.
       Α.
13
       Q. -- and one was what year?
14
       Α.
            Last year.
15
            Okay. And those are the only two games that
       Ο.
16 you recall attending; is that right?
17
            It's the only games I've been allowed to go
       Α.
18 to.
19
                  MS. HAYES: Objection, nonresponsive.
20
       Q.
            Those are the only two games you recall
21 attending; is that right?
22
       Α.
            Yes.
23
            Okay. And when Logan tells you about his
24 games on these FaceTime calls, why do you change the
25 subject?
```

- 1 A. I don't.
- Q. Would it surprise you that the child reports
- 3 you always change the subject when he -- whenever he
 - broaches the conversation of hockey?
 - A. Would I find that --
- 6 Q. Do you find that surprising, that he reports
- 7 that you always change the subject?
- 8 A. Yes.
- 9 Q. Okay.
- 10 A. Because I actually talk more about hockey
- 11 and practicing and being on -- on the ice and off the
- 12 ice, what training he's going through and how fast is
- 13 he doing -- he's doing -- he is and how proud I am of
- 14 him, of all the hard work that he does. So I support
- 15 him.

5

- 16 Q. And even recently you've encouraged him to
- 17 start playing football; is that right?
- 18 A. No. He's brought that up.
- 19 Q. He's brought up playing football?
- 20 A. Yes.
- 21 Q. When your son was in Tennessee at his recent
- 22 tournament, did you watch those -- the tournament on
- 23 LiveBarn?
- A. No. I didn't know that I could. And again,
- 25 I had the wrong schedule. I didn't know where he was

```
1 playing or what was going on.
2
            Well, you knew your son was in Nashville
3 last weekend, because you just told the Court about
4 it, right?
5
       Α.
            I found out after the fact.
            So where did you think your son was last
6
       Ο.
7 weekend when you didn't have your period of
  possession?
8
9
       A. I wasn't sure.
10
            Okay. Did you have conversations with
11 either the amicus attorney or the mother regarding
12 where the child is?
       A. Vickie mentioned a possibility of him going
13
14 out of the state, but she didn't mention where.
15
       Q. Okay. And in fact, once you found out your
16 son was leaving the state for his tournament, you
17 still contacted him and asked him to come over for a
18 one month birthday party you were having for his
19 brother; is that right?
20
       Α.
            No.
21
       Q. You didn't ask him to come over knowing he
22 was out of state?
23
       Α.
            No.
            Okay. And do you recall sending a message
24
25 to Vickie -- excuse me -- to Nikki about how Logan
```

```
1 indicated to you on the phone he would want to come to
2 the birthday party and was upset that he couldn't
3 come?
             I -- I never told her that he was upset.
5 With the schedule that was sent to me --
6
                  MS. HAYES: Objection, nonresponsive.
7
            -- I opened -- could you ask the question
       Α.
8
  again?
            Sure. Isn't it true that last week you sent
9
       Q.
10 an Our Family Wizard message to Nikki indicating that
11 the child was upset because you had asked him to come
12 to your home for Maxton's birthday party and he
13 indicated he wanted to come, and you wanted to see if
14 she would reconsider? Do you remember that?
15
            I asked her what was her opinion.
       Α.
16
       Ο.
            Okay. So, yes, you remember sending that
17 message?
18
            Not that he was upset, no.
       Α.
19
            Okay. Do you remember some communications
       0.
20 back and forth in the last few days about how it would
21 be upsetting to the child to try to kind of boost up
22 or talk about how great this birthday party would be
23 for Maxton when the child wouldn't be able to attend?
            Conversations with whom?
24
       Α.
25
            The lawyers in the case, Mr. Crockett.
       Ο.
```

```
1
                   I got a insulting email from Vickie
       Α.
            Yes.
  Alexander.
3
            Okay. And what was insulting about that
       0.
4 message?
5
            Saying that I would be cruel to my child.
       Α.
6
       Ο.
            Okay. Do you think it would be cruel to try
7 to deliberately upset your child or make him feel like
  he's missing out?
9
            Deliberately, for any parent to do that,
       Α.
10 yes, that could be considered cruel.
11
            Okay. But that -- you don't think that's
12 what you did --
13
            No, ma'am.
       Α.
14
            -- when you asked your child to come over
15 and tell him about all the things he would be missing
16 out on if he doesn't?
17
            Let's talk about that. First of all --
       Α.
18
                  MS. HAYES: Objection, nonresponsive.
19
            Ask the question again.
       Α.
20
       Ο.
            Sure. You don't think you were cruel when
21 you talked to your son about all the things that he
22 would be missing out on by missing this little boy's
23 birthday party if he didn't come over?
            No, because the schedule I had, he wasn't
24
25 out of town.
```

```
1
                 MS. HAYES: Objection, nonresponsive
2
  after no.
3
            So the answer is no.
                 MS. HAYES: Objection, nonresponsive
5 after no.
6
       Q. You had already been told that Logan was
7 going to be out of town for hockey and would not be
8 able to attend the birthday party, weren't you --
9 hadn't you?
            I was told there was a possibility.
10
11 the schedule was sent to me. And I opened up the
12 schedule, and he was not out of town.
13
                 MS. HAYES: Objection, nonresponsive.
            You had already been told the child would be
14
       Ο.
  out of town for a hockey tournament, hadn't you?
15
16
            No. Possibility.
17
                 MS. HAYES: Objection, nonresponsive
18 after no.
19
            Did it ever cross your mind that talking
20 about that birthday party and telling this child what
21 he was missing out on could upset him?
22
            I don't understand your question, ma'am.
       Α.
23
                 MS. HAYES: Objection, nonresponsive.
24
            You agree you told your son about what was
25 going to happen at Maxton's one-month-old birthday
```

```
1 party, right?
2
            Yes. And I had rights to possession that
       Α.
3 day.
                  MS. HAYES: Objection, nonresponsive
5 after yes.
6
       Ο.
            My question is, did it cross your mind that
7 it would upset him to tell him everything he would be
8 missing out on knowing he wouldn't be able to come?
9 Did that ever cross your mind?
10
       Α.
            Your -- your question doesn't make any
11 sense.
12
                  MS. HAYES: Objection, nonresponsive.
             It's a yes or no, Mr. Crockett. Did it
13
       Q.
14 cross your mind that you might be hurting your child?
15
       Α.
            No.
            Now, you were talking earlier about all
16
       Ο.
17 these stomach issues that your son used to have,
18 right?
19
       Α.
            Yes.
20
            Okay. And that was all the times that he
21 was in your care; you would take him to the doctor for
22 these stomach issues, right?
23
       Α.
            No.
24
            Does it surprise you that since this Court
25 stopped possession -- unsupervised possession, your
```

```
1 stomach -- your son hasn't had any problems with
2 stomach problems?
3
            I don't believe that's true.
4
       Ο.
            Okay.
5
       Α.
            I don't know.
6
       Ο.
            Okay. Well, you have the right to consult
  with his doctors, right?
8
       Α.
            I saw Dr. Lee just last week.
9
                  MS. HAYES: Objection, nonresponsive.
            It's yes or no. You have to --
10
       Ο.
11
            Yes, mm-hmm.
12
       Ο.
            Okay. And you would agree with me that your
13 son has not had problems with his stomach since the
14 Court entered an order for supervised possession for
15 you?
16
       A. No, I disagree. Before.
17
                 MS. HAYES: Objection, nonresponsive
18 after no.
19
            Does it make you happy that his stomach
20 aches are gone?
21
       Α.
            Yes.
22
            And do you think it's just a coincidence
       Q.
23 that that's coincided with the fact that you now have
24 supervised possession?
25
       Α.
            That's not a -- that's not a true question.
```

```
MS. HAYES: Objection, nonresponsive.
1
2
       Ο.
             If you start having unsupervised access with
3 your son, do you intend to take him to his hockey
4 practices and games?
5
             I think that's something that Lauriston and
6 I need to discuss. He's talking about other
7 activities. If that -- if that's --
8
                  MS. HAYES: Objection, nonresponsive.
9
            -- if -- if that's something he wants to do,
       Α.
10
  then I will say yes.
11
                  MS. HAYES: Objection, nonresponsive.
12
       Ο.
            Just yes or no. If you have possession of
13 your son on a weekend and he has hockey activities, do
14 you intend to take him to those activities?
15
       Α.
            At this time, no.
16
            Okay. And if your son -- if you have
17 standard possession and your son has an out-of-town
  tournament, do you intend to take him to his
18
  out-of-town tournaments?
19
20
            At this time, no.
21
            And the same question would be, if there's
       0.
22 an out-of-state tournament, do you also not intend to
  take him to those?
23
24
       Α.
            At this time, no.
25
            Okay. Have you told Lauriston, or Logan,
       Ο.
```

```
1 Lauriston, IV, that if he's with you, that he won't be
2 able to go to his hockey activities?
3
       Α.
            No.
            Do you think that that will affect his
       Ο.
  desire to come spend time with you?
5
6
                 MR. BAGLEY: Objection to form.
7
             I -- I don't really understand your
       Α.
  question.
9
            Okay. Well, do you think that Logan -- if
       Q.
10 Logan knew that you weren't going to take him to his
11 activities --
12
       Α.
            Ma'am, are you -- are you going to call him
13 Logan or Lauriston? You're -- you're flipping,
14 flopping. I'm just trying to understand.
15
                 MS. HAYES: Objection, sidebar;
16 objection, nonresponsive.
17
            Do you think your -- if your son knew that
18 you were not going to take him to his activities, that
19 he would still want to spend any time with you?
20
                 MR. BAGLEY: Objection, form.
21
       Α.
            Yes.
22
            Okay. So why are you afraid to tell him
       Q.
23 that you're not intending to take him to his
24 activities?
25
            I haven't said I wasn't intending. I said,
```

```
1 at this time.
2
       Q. Okay. Well, when are you going to tell your
3 son that if it's your period of possession, you're not
4 going to take him to his activities?
5
                 MR. BAGLEY: Objection, form.
6
       Α.
            When? I think that would be a discussion
7 that would be best done in Dr. Frye's office.
8
       Ο.
            Okay. Well, let's just assume for a second
9 that you don't have any sessions with Dr. Frye between
10 how and the time that you have unsupervised access
11 with your son. Do you intend to let him know that
12 you -- as of right now, you don't intend to take him
13 to his activities?
14
            If that comes up, we'll -- we will have a
  conversation; and I'll let him know, yes, at this
15
16 time. At this time.
17
       Q.
            Okay.
18
            Not forever. At this time.
       Α.
19
            Okay. What is different about this time
       Ο.
20 versus forever?
21
            Because hockey has been used as a alienation
       Α.
22 force, I will not participate in alienation to
23 reinforce alienation with my child and put him in a
24 mode of anxiety, having to perform either for Rob
25 Cottingham, Nikki Ngo, or myself. I will not
```

```
1 participate in that type of psychological harm with
2 him.
3
            Did it ever cross your mind that it might be
       Ο.
4 an amazing bonding experience for you to actually take
5 an active participation -- participant role in
6 something that your child purports to love?
7
            Absolutely. Actually, we did in karate.
       Α.
8 His mother came once. He achieved the level of red
9 belt, and then he was jerked out of something that he
10 loved. So I've actually experienced that.
11
            Okay. So is this retaliation; are you
12 trying to do the same thing --
13
       Α.
            No, ma'am. I'm just following -- taking
14 Dr. Threats' suggestions, Forrest's suggestions, and
15 Dr. Frye.
                 MS. HAYES: Objection, nonresponsive.
16
17
            Mr. Crockett, I'm not --
       Q.
18
       Α.
            Is this retaliation? No, ma'am.
19
            I'm not interested in hearing about what
       0.
20 anybody else told you. I'm -- I'm curious about what
21 your opinions are, okay?
22
       Α.
            Yes, ma'am.
23
            So when I ask these questions, I'm just
24 asking you about your opinions, Lauriston Crockett.
25
       Α.
            Mm-hmm.
```

- Q. Do you think it might help your relationship
 with your son if you take a role and encourage the
 things that he tells you he loves?
 - A. To that question, yes.
- Q. Okay. So why aren't you going to take him to his activities right now when he tells you he loves them and wants to go?
- A. Well, number one, he hasn't told me. Number two, Rob Cottingham is assistant coach, and it puts
 Lauriston in a very precarious situation, a situation for anxiety and alienation. So I will not participate with it at this time.
- Q. Mr. Crockett, earlier we reviewed an exhibit
 where you sent Nikki a message on Our Family Wizard
 saying all this child can talk about is hockey, and
 you're sick of it. Remember that? You remember that?
 - A. I remember a large part of the email.
- Q. Okay. And so now you're telling this Court that your child has not told you he loves hockey and wants to go to his activities. Is that what you're telling the Court?
- 22 A. No, ma'am.

17

- Q. No, that's not what you're telling me?
- A. I didn't say that he didn't say love -- he didn't love hockey.

1 Okay. Q. 2 I'm --Α. 3 You understand he wants to go, right? Ο. 4 Α. Yes. 5 Okay. So why would you deliberately hurt 0. 6 your son by not taking him to the things he loves? 7 I'm deliberately loving my child and Α. protecting him until we work through that hockey is 9 not used as an alienation. 10 O. Okay. Tell me which expert -- now I'm 11 specifically asking for which expert, and I just want 12 the name -- told you that it was a good idea for you 13 not to take your son to his activities? 14 I can't. Α. 15 Q. Okay. 16 A. Because we're --17 MS. HAYES: Objection, nonresponsive 18 after, I can't. 19 You said activities. No one's ever said Α. 20 activities. 21 Is there -- are you -- is there an expert 0. 22 that has told you not to take your son to his hockey 23 activities during your periods of possession? 24 Α. Yes. 25 Q. Who is that expert?

Dr. Threats. 1 Α. You understand Dr. Threats was removed in 2 this case and is no longer the therapist, right? Α. Yes. 5 Okay. And you're telling this Court that 6 you're still taking the advice of a therapist that was removed by this Court, right? 8 Α. I'm telling the Court that I'm taking 9 knowledge that was gained. 10 Dr. Frye and I -- I also had a 11 conversation about this. 12 MS. HAYES: Objection, nonresponsive. You're taking the advice of a therapist that 13 Q. 14 is no -- that was removed by this Court; is that 15 right? 16 Α. Multiple therapists. 17 MS. HAYES: Objection, nonresponsive. 18 It's just a yes or no. Q. 19 Α. Yes. 20 Ο. Okay. And it's your testimony that you 21 don't believe it's hurtful to your child to stop him 22 from going to his hockey activities, right? 23 No, I believe it would be hurtful to stop 24 him from playing hockey at this time. 25 Q. Okay. But you intend to do it anyway by

```
refusing to take him to his activities; is that right?
2
            No, I didn't say that.
       Α.
3
            Are you going to allow his mother to take
       Ο.
4 him during your periods of possession?
5
            At this time, yes, because that's in
6 Lauriston's best interest.
7
            Okay. Do you owe any outstanding attorneys'
       Ο.
  fees to any of your attorneys?
9
       Α.
            No, I don't believe so.
10
            Okay. And you indicated that Genostim is
11 renting your -- your residence and that they're paying
12 your utilities and that they pay your car payment.
13 But you've also indicated to the Court that you're in
14 the process of filing bankruptcy, right?
15
            Personal bankruptcy.
       Α.
16
       Ο.
            Okay. What is it you're trying to
17 discharge; what debts do you have that you're trying
  to discharge in bankruptcy?
18
19
            Personally?
       Α.
20
       0.
            Correct.
21
            Credit card debt.
       Α.
22
            Okay. So all the credit cards you listed
       Q.
23 off, what -- what's the total amount of credit card
24 debt you have?
25
       Α.
             I don't have the number in front of me, but
```

```
1 it's a very large number.
2
             Is it over a hundred thousand dollars?
       Ο.
3
            Probably close to.
            Okay. And so -- but other than those credit
  card debts, your testimony earlier, other than, I
6 believe, Credit One, you don't have any outstanding
7 debts; is that right?
            I'm sorry?
8
       Α.
9
             I believe you testified earlier -- and
       Q.
10 correct me if I'm wrong -- that you had your mortgage
11 and your vehicle and that you had one other line of
12 credit with some credit agency, and then you had your
13 various credit cards; is that right?
14
       Α.
            Yeah, and I do have a -- a personal -- I've
15 just thought about this, too. I do have a personal
16 line of credit with Frost Bank that is in arrears
17 right now, too.
18
       Q.
            Okay. And how much is that line of credit?
19
       Α.
            5,000.
20
       Ο.
            $5,000?
21
            Line of cred- -- personal line of credit,
       Α.
22 yeah.
23
            So credit cards and this $5,000 loan are the
       0.
24 reason that you're filing for bankruptcy?
            And other loans that I've -- I've taken.
25
       Α.
```

```
Okay. Does it have anything to do with the
1
       Q.
  civil claims that have been filed in this case?
3
       Α.
            No.
            Okay. Were you aware there are civil claims
       0.
  filed in this case?
5
6
       Α.
            Yes.
7
            Okay. So I just want to kind of go through,
       Ο.
8 who is your current treating physician, primary
9 physician?
       A. I only have really one physician that I've
10
11 seen in the last two years; and that would be
12 Dr. Trang, my urologist.
13
       Q.
            Okay. So you don't have someone that you go
14 in for a regular physical with?
15
       A. No. Dr. Trang is -- is pretty much all I
16 really -- I -- I'm pretty healthy, so --
            Okay. And so you indicated that you see
17
18 Mr. Macfarlane for therapy -- is that right --
19 individual therapy?
            Yeah, counseling, have someone to talk to.
20
21
            Okay. And then you see Dr. Arauzo still as
       0.
22 your psychiatrist, your treating psychiatrist?
23
            You can say psychi- -- I -- I talk to him
       Α.
24 every six months.
25
            Okay. But he prescribes your medication,
       O.
```

```
right?
1
2
       Α.
            Yes.
3
            Okay. And is there any other physicians
4 that you're current -- oh, other than Dr. Frye, is
  there any other physicians you're seeing on a regular
6 basis?
7
       Α.
            No.
            And can you tell me, do you believe that
  you've changed since 2017 as a result of these various
10 therapies?
11
       Α.
            Oh, yes.
12
       Ο.
            Do you believe that you're more supportive
  of your son today than you were in 2017?
14
            Yes. And the whole situation.
       Α.
15
            You're more supportive of the whole
       Ο.
16 situation with his mother?
17
            Well, I took different courses and got
18 greater understanding through time and wisdom and
19 reading and -- and the difference between parallel
20 parenting and co-parenting and -- and to always make
21 sure that the child is not put in the middle. And to
22 always make sure that he's loved by everyone and
23 support the child.
24
                  You know, at -- at the end of the day,
25 it doesn't matter what I think or anybody else does.
```

```
1 It matters what's in the best interest of Lauriston.
2
            And how long do you and Lauriston talk on
       Ο.
3 the phone during your phone calls together?
            Well, in the last couple of years, sometimes
5 maybe two, three minutes, maybe four or five minutes.
6 And now recently we're on the phone for almost 20, 30
7 minutes, until -- he gets called on the way there, so
8 we're -- he's in the car eating and he's on his way to
9 hockey every time I -- I speak to him, so --
10
                  But our conversations are running
11 longer and longer and longer. And then it's, when he
12 pulls into the parking lot, he doesn't want to get off
13 the phone. He wants to keep talking, so probably
14 we're having a good time.
15
            Okay. So approximately 20 minutes you think
       Ο.
16 your conversations last?
            Maybe sometimes a little bit longer.
17
       Α.
18
       Q.
            Okay.
19
                  (Exhibit 19 marked.)
20
                  I'm showing you Deposition Exhibit 19.
21 I just want to ask you, had you ever seen that before?
22
       Α.
            I -- I can't say that I've never s- -- I've
23 never seen this.
            Okay. And -- and earlier I had referenced
24
       0.
25 this letter, and it sounded like you hadn't seen it;
```

```
1 so I just wanted to present you with a copy and -- and
2 make sure that --
3
                  In September, when this letter went out
4 by FLP, it looks like this one was addressed to
  Ms. Cottingham. But you didn't get one from FLP?
6
       Α.
            No, ma'am.
7
            Okay. But it does seem to indicate here
       Ο.
  that this is no longer -- under their corporate
  charter and their mandate, they're no longer allowed
10 to provide services in this case; is that right?
11
       Α.
            Yes.
12
       Ο.
            And let me just review to make sure there's
13 nothing else before we...
14
                  Do you have the resources to fund the
15 trust for your son currently?
16
       Α.
            What trust?
17
            The trust that you agreed to fund in the
       Q.
18 agreed order in 2014.
19
             There is a Crockett Family Trust in place.
       Α.
20
       0.
            Okay. And where -- who -- who owns that
  trust; do you -- who manages that trust?
21
22
            Ma'am, you would have to contact the -- one
       Α.
23
  of the -- the attorney.
24
            Who is the attorney?
25
       A. Drew Siegel.
```

1 Dr. Siegel is the ... Q. One of the trustees. 2 Α. 3 He's the trustee of the trust for your son, 0. 4 and he's the lawyer --5 Α. He's one. He's one. 6 Ο. Okay. Who is the other one? 7 You -- you'll have to talk to him. I'm not Α. going to talk about the Crockett Family Trust. 9 Mr. Crockett --Q. I'm not -- I'm not a trustee. 10 Α. 11 -- you're under oath here today. 0. 12 Α. Mm-hmm. 13 Q. You've refused to answer about 50 of my 14 questions. 15 I am asking you, who is the trustee for 16 the trust for your son that you agreed in this case to 17 have? 18 Α. There are more than one trustees. 19 Great. Who are they? Ο. 20 Lisa Garber. Α. 21 Ο. Is that your sister? 22 Α. Yes. 23 Okay. And who else? Q. Linda Stapler. 24 Α. 25 Ο. Okay. Anyone else?

1 Tom -- Tom Lima. Α. 2 Mm-hmm? Ο. 3 Α. And Drew Siegel. Okay. So you have four trustees listed on Ο. 5 your son's trust? 6 Α. Yes. 7 And -- and Lauriston Crockett is the only beneficiary of that trust? 9 Α. No. As of a week and a half ago, Maxton is 10 now on the trust. 11 Okay. And what's contained within the 12 trust; what's -- what's the corpus of the trust? 13 Α. I don't understand your question. What's -- what's in the trust? What -- what 14 Ο. 15 property or monies are in the trust? 16 Α. Ma'am, I'm not going to discuss that. 17 Okay. Sir, you don't get the option. I'm Q. 18 asking you a question. 19 Α. Mm-hmm. 20 Ο. What have you put into the trust for the 21 benefit of your son? 22 And from counsel --Α. 23 MS. HAYES: Objection, nonresponsive. 24 I'm -- I'm -- I'm -- I'm not going to -- I 25 don't have the list in front of me, and I'm not going

```
to estimate what's here and what's there. So at this
  time I'm just --
3
             Okay.
        Ο.
             -- not going to be able to answer.
5
             You understand you've been sued for fail --
6 for breaching the contract -- or the agreement to
  provide the trust for your son, right?
8
       Α.
             Yes.
9
             Okay. And so you're telling me, Nope, I
       Q.
10 didn't do it. I've got a trust for my son, right?
11
             Not that trust.
12
       Ο.
             So this isn't the trust that you set up for
  the support of Lauriston Crockett?
14
             Yes, it is.
       Α.
15
             Okay, great.
       Q.
             But not under the guidelines of that other
16
17 document.
18
       Q.
             So you con- --
19
             That perverted document.
       Α.
20
        Ο.
             So you concede you haven't complied with the
21 agreement of the parties to create the trust as set
22 forth therein?
23
             Nor will I.
       Α.
24
             Okay. And -- and again, you don't know
25 what's being held in the trust currently for the
```

```
1 benefit of Lauriston Crockett and Maxton Crockett; is
  that right?
3
             You can reach out to the attorney, I'm sure.
                  MS. HAYES: Objection, nonresponsive.
 4
5
             Do you know or not? Do you know what's
6
  inside this trust or not?
7
             Everything that's inside the trust, no.
       Α.
8
       Ο.
             Okay. And Maxton, is that a family name?
9
       Α.
             No.
10
       Ο.
             Is your dog's name Max?
11
       Α.
             Yes.
12
       Ο.
             Has there ever been a time that you can
13 remember that you grabbed your son and injured him?
14
       Α.
             Never.
15
             Do you spank your son?
       Ο.
16
       Α.
             No.
17
             Did you spank your son when he was in your
       Q.
18 possession?
19
             Lauriston has been --
       Α.
20
                  MS. HAYES: Objection, nonresponsive.
21
             It's just a yes or no.
       Q.
22
       Α.
             Spanking, no.
23
             At some point Jennifer Frendle changed her
24 recommendation and requested a psychological
25 evaluation of Ms. Ngo. Do you remember that?
```

A. Yes.

1

- Q. Okay. And she testified in court that it was based on concerns raised by the father. Do you remember that?
- A. I don't recall that. It was from her own concerns, is what I recall.
- Q. Can you tell the Court, what issues did you raise with Jennifer Frendle regarding concerns for the mother's mental health?
- 10 A. You know, it was a very brief conversation.

 11 I had concerns about Lauriston speaking to Dr. Frye

 12 that his mother makes him sleep with her. They use

 13 the same bathroom. They use the same closet. He's

 14 embarrassed if his friends find out that he rooms with
- 15 his mother and that he likes Rob more than he loves 16 his mother.
- Q. And are these conversations that you allegedly had with the child either on one of your phone calls or your supervised possession periods?
- A. Dr. Frye was there. I wouldn't continue on with the conversation. I just sat back and listened.

 I find it's better to listen.
- Q. Okay. So you heard these things reported to Dr. Frye by the child?
- A. No. I'm -- I'm sorry. Dr. Frye -- I heard

```
1 about -- the part about, You ran over my mother, and
2 things of that nature.
3
                 Dr. Frye told me that Lauriston had
4 this conversation with her. And so, yes, it did
5 concern me; so I voiced my concern to Jennifer
6 Frendle.
7
            Did you ever reach out to Nikki and inquire
8 as to the truthfulness of any of these statements
9 before contacting Jennifer Frendle?
10
       Α.
            No.
            Don't you think that would have been a
11
12 better choice for the benefit of your son?
13
            It would have been a wonderful choice if we
       Α.
14 were able to communicate and co-parent or even have a
15 conversation. But most of the conversations on Wizard
16 is not written by Nikki Ngo. It's written by Rob
17 Cottingham.
18
       Q. Okay. You have zero personal knowledge of
  that, do you?
19
20
       Α.
            I have Nikki admitting it.
21
            You -- your -- Nikki's admitted to you
       Ο.
22
  that --
23
            Mm-hmm.
       Α.
24
           -- Rob writes all of her My Family Wizard
25 messages?
```

1 Α. You might want to read with us. 2 MS. HAYES: Objection, nonresponsive. 3 Α. Yes. Your testimony --4 Ο. 5 Nikki has admitted it. Α. 6 Ο. Okay. And so when did she admit that to you 7 in writing? 8 Α. Yeah, like last month. 9 Okay. And so your testimony is, if I go Q. 10 back and review all the Our Family Wizard messages, 11 there will be an admission from Nikki saying, You're 12 right, I don't really --13 Rob helps me write, yeah. 14 Okay. Rob helps me write. That was the 15 statement? 16 Well, another statement she has is -- during 17 her deposition, it was brought --18 MS. HAYES: Objection, nonresponsive. 19 We're just talking about the Wizard, Ο. 20 Mr. Crockett. You said last month there was an admission on Our Family Wizard about --22 Yeah, Nikki admits that Rob helps her write. Α. 23 Okay. Anything else that you can think of? Q. Not at this time. 24 Α. 25 Okay. You understand that Rob plays a Ο.

```
1 really big role in your son's life right now, right?
2
            Yeah. I believe Jennifer Frendle made that
       Α.
3 perfectly clear.
            And don't you think it would be helpful to
5 have Rob's input as it pertains to your son?
6
       Α.
            Rob Cottingham created a false police report
7 about me harming my child.
8
                  MS. HAYES: Objection, nonresponsive.
9
             So, no, I do not. I believe that Rob
       Α.
10 Cottingham has a criminal record and has continued
11 with his conduct.
12
                  MS. HAYES: Objection, nonresponsive.
13
            No, I do not.
       Α.
14
       Ο.
            You -- you understand he's your -- he helps
  your son with hockey, right?
15
            He, in my knowledge, spends probably almost
16
17 90 percent of his time taking care of Lauriston.
18
       Q.
            Does that make you jealous?
19
            No. It concerns me.
       Α.
20
       Q.
            It concerns you why?
21
            Why isn't his mother participating?
       Α.
22
            Okay. But you -- and you started this
       Q.
23 deposition off telling me that a child should have
  support and love from everybody in his life, right?
24
25
       Α.
            Mm-hmm.
```

```
Why wouldn't you be thrilled that there's
1
        Q.
2 another man in your child's life that is supporting
3 him and loving him?
             Well, ma'am, when you look at the character
  of Rob Cottingham, then I have to question.
5
6
        Ο.
             So you have concerns with Rob's character --
7
       Α.
            Absolutely.
8
       Ο.
             -- in supporting your son?
9
       Α.
             Absolutely.
10
       Ο.
             Okay. And is there any instances that you
11 can think of where Rob Cottingham has been
12 disrespectful to your face?
13
       Α.
             Yes.
14
             Okay. When was that?
             At the hockey game with a false claim of
15
16 some absurd thing that I've never heard of before.
17
       Q.
             Okay.
18
             Going to the Highland Park Police Department
19 and making a false police report. Also stating that
20 Nikki and I were married and that I abused her, and
21
22
                  MS. HAYES: Objection, nonresponsive.
23
             -- and I abused my child.
       Α.
24
        Ο.
             My question was to you --
25
       Α.
             Mm-hmm?
```

```
1
             -- when was Mr. Cottingham ugly to you, to
        Q.
2
  your --
3
            Oh, I thought we were talking about his
       Α.
4 character in general towards me.
5
             I'm talking about what you have personal
       0.
6 knowledge of, Mr. Crockett.
7
                  You indicated that you -- that he was
8 ugly to you at the -- at the hockey game when you --
9 when he said that you called his wife a whore.
10 there any other time that you can think of that
11 Mr. Cottingham was ugly to you?
            Well...
12
       Α.
13
       Q.
            The answer is no, right, you can't think of
14 any?
15
            Yes, I -- I can.
       Α.
16
        Ο.
            Okay. Tell me about it.
            Well, first of all, the Police Department.
17
       Α.
18 I spoke to the Police Department personally, but --
19 but --
20
                  MS. HAYES: Objection, nonresponsive.
21
             -- we'll get -- we'll get past this.
       Α.
22 understand your question.
23
                  MS. HAYES: Objection, nonresponsive.
24
       Α.
            Okay.
                  MS. HAYES: Objection, sidebar.
25
```

- 1 Q. The answer is no?
- 2 A. No. The answer is yes.
- Q. Okay. Tell me about it.
- 4 A. I would say recently it was last time we
- 5 were even in Dr. Frye's office.
- 6 Q. Mm-hmm?
- 7 A. Rob Cottingham picks Lauriston up 90 percent
- 8 of the time. And standing at the window waving
- 9 goodbye to Lauriston, and Rob Cottingham seems to find
- 10 it humorous to turn around, smile at me and wave, and
- 11 then -- and, you know, that's pretty hurtful.
- 12 Q. Do you think it's possible that maybe Rob's
- 13 just a friendly guy and wants to try to make things
- 14 smooth over a little bit?
- 15 A. No, ma'am. And if you don't take my
- 16 opinion, take Dr. Frye's.
- MS. HAYES: Objection, nonresponsive.
- 18 A. No, I do not.
- 19 Q. Okay. Mr. Crockett, you've spent a lot of
- 20 time today relying on the words of other people. I'm
- 21 only interested in your opinions, okay?
- 22 A. Yes.
- Q. Do you think it's a possibility that maybe
- 24 Rob's just waving hi because he wants to try to get
- 25 along for the sake of your son?

```
No, ma'am.
1
       Α.
2
            Okay. Do you think it's -- well, strike
3
  that.
                  So the only thing you can think of is
5 where he got upset because he thought you'd called his
6 wife a whore. That's the only thing you can give me
7 here today regarding times Rob's been ugly to you?
8
       Α.
            Let me give it some -- I mean, don't really
9 have a lot of contact with him.
10
                  Yeah. Well, at hockey Kevin Rachel was
11 with me, and Rob would -- when I was trying to watch
12 Lauriston play, we were standing by the ice. He would
13 skate over with a couple of the other hockey coaches
14 and stand and skate in front of us.
15
                  We'd move over. Then they'd skate in
16 front of us again to try to keep us from looking --
17 from being able to wave or look at Lauriston with
18 Kevin Rachel. So it's not something I'm just making
  up. There's a witness to the fact.
19
20
                  MS. HAYES: Objection, non --
21
            Little -- little quirks like that.
       Α.
22
                 MS. HAYES: Objection, sidebar.
23
       Α.
             I'm sorry, ma'am. When you say sidebar, I'm
24 not trying to rude --
25
       Ο.
            I understand.
```

```
1
             -- or anything. I'm just -- this isn't --
       Α.
  I'm doing the best that I can.
            I understand, Mr. Crockett. There's no
3
4 question before you right now. When my objection is
  lodged, you can stop talking.
6
            Ma'am? I'm sorry, I didn't hear you.
7
             I said, When my objection is lodged, you can
        Ο.
8
  stop talking.
9
       Α.
            Okay.
10
             I guess the long and short of it,
11 Mr. Crockett, is, we sit here today and you have told
12 me not one thing that you think you have done wrong to
13 make the strained relationship between you and your
14 son, right?
15
            Not at all.
       Α.
16
        Ο.
            You think you're a perfect parent, right?
17
       Α.
            No.
18
            It's all Nikki's fault, and it's all Rob's
       Q.
  fault, right?
19
20
             I have never said that.
21
            Well, you -- you actually did. You said all
        Ο.
22 of these problems with you and your son were created
23 by Nikki and Rob, right?
24
       Α.
            Ma'am, I have been under --
25
                  MS. HAYES: Objection, nonresponsive.
```

```
-- supervised visitation --
1
       Α.
2
                  MS. HAYES: Objection, nonresponsive.
3
       Α.
             To answer --
4
       0.
            Do --
5
       Α.
            -- your question, no.
6
            Do you take any responsibility in this case
  for what has happened and the fact that you've spent
8
  two years away from your son?
9
                  MR. BAGLEY: Objection, form.
             I think I have to.
10
       Α.
            Okay. And do you take any responsibility
11
12 for the fact that ultimately your son tells everybody
13 in his life he does not want to see you?
14
                  MR. BAGLEY: Objection, form.
15
            Do I take responsibility for that?
       Α.
16
        Ο.
            Correct.
17
                  I believe the child's been alienated
       Α.
            No.
18 and harmed.
19
                  MS. HAYES: Okay. Pass the witness.
20
                  MR. BAGLEY: I reserve.
21
                  MS. ALEXANDER: I reserve.
22
                  THE VIDEOGRAPHER: Before we go off,
23 would you guys like a copy of the video?
24
                  MS. HAYES: I do. I want a copy of
25 both.
```

```
1
                  MR. BAGLEY: Please. What format do
 2 you send -- oh, well, I'll wait.
 3
                  THE WITNESS: Same thing I asked him.
 4
                  THE VIDEOGRAPHER: We're off record at
5 4:49 p.m.
6
                 MR. BAGLEY: It's more for the
7 transcript. Let me double-check in what format I need
8 it.
9
                  THE REPORTER: Okay.
10
                  (Proceedings concluded at 4:50 p.m.)
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		Page	341
1	CHANGES AND SIGNATURE		
	TO THE ORAL DEPOSITION OF		
2	LAURISTON CROCKETT, III		
	Volume 1 of 1		
3	November 8, 2022		
4	PAGE LINE CHANGE REASON		
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1	I, LAURISTON CROCKETT, III, have read the	
2	regoing deposition and hereby affix my signature	
3	that same is true and correct, except as noted above.	
4		
5		
	LAURISTON CROCKETT, III	
6		
	STATE OF)	
7	COUNTY OF)	
8	Before me,, on this	
	day personally appeared LAURISTON CROCKETT, III, known	
9	to me (or proved to me under oath or through	
	(description of identity card or other	
10	document) to be the person whose name is subscribed to	
	the foregoing instrument and acknowledged to me that	
11	they executed the same for the purposes and	
	consideration therein expressed.	
12	(Seal) Given under my hand and seal of office	
	this day of,	
13		
14		
15		
	Notary Public in and for the	
16	State of	
17		
18		
19		
20		
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22		
23		
24		
25		

1	NO. DF-13-06713		
2	IN THE INTEREST OF § IN THE DISTRICT COURT		
	§		
3	§		
	L.L.C. § 256TH JUDICIAL DISTRICT		
4	8		
	§		
5	§		
	MINOR CHILD § DALLAS COUNTY, TEXAS		
6			
7			
8	REPORTER'S CERTIFICATION		
	DEPOSITION OF LAURISTON CROCKETT, III		
9	November 8, 2022		
10			
11			
12	I, Amy Sturgess, Certified Shorthand Reporter in		
	and for the State of Texas, hereby certify to the		
	following:		
15	That the witness, LAURISTON CROCKETT, III, was		
	duly sworn by the officer and that the transcript of		
	the oral deposition is a true record of the testimony		
	given by the witness;		
19	That the deposition transcript was submitted on		
20	to the witness or to the attorney for		
	the witness for examination, signature, and return to		
22 23	me by;		
	That the amount of time used by each party at the		
2 4 25	deposition is as follows:		
د ی	COURTNEY LEWIS/BRIAN BAGLEY - 0:00		

```
1
       KRIS HAYES
                            - 5:34
       VICKIE M. ALEXANDER - 0:00
2
3
       That pursuant to information given to the
4 deposition officer at the time said testimony was
5
  taken, the following includes counsel for all parties
6 of record:
7 COURTNEY LEWIS AND BRIAN BAGLEY FOR THE PETITIONER,
  LAURISTON CROCKETT, III;
8 KRIS HAYES FOR THE RESPONDENT, DIEM "NIKKI" NGO;
  VICKIE M. ALEXANDER, AMICUS.
9
10
        I further certify that I am neither counsel for,
11 related to, nor employed by any of the parties or
12 attorneys in the action in which this proceeding was
13 taken, and further, that I am not financially or
14 otherwise interested in the outcome of the action.
15
       Further certification requirements pursuant to
16 Rule 203 of TRCP will be certified to after they have
  occurred.
17
18
       Certified to by me November 21, 2022.
19
20
21
                       Amy Sturgess, CSR No. 6993
22
                       Expiration Date: 7.31.24
                       WENDY WARD ROBERTS & ASSOCIATES
23
                       Firm Registration No. 216
                       1205 Main Street
24
                       Garland, Texas 75040
                       972.494.2000
25
                       Job No. 39166
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1	FURTHER CERTIFICATION BY COURT REPORTING FIRM
	UNDER RULE 203 TRCP
2	
3	The original deposition was was not
4	returned to the deposition officer;
5	If returned, the attached Changes and Signature
6	page contains any changes and the reasons therefor;
7	If returned, the original deposition was
8	delivered to KRIS HAYES, Custodial Attorney;
9	That \$ is the deposition officer's
10	charges to the Respondent, DIEM "NIKKI" NGO, for
11	preparing the original deposition transcript and any
12	copies of exhibits;
13	That the deposition was delivered in accordance
14	with Rule 203.3, and that a copy of this certificate
15	was served on all parties shown herein and filed with
16	the Clerk.
17	Certified to by me this day of,
18	2022.
19	
20	
21	
22	
	WENDY WARD ROBERTS & ASSOCIATES
23	Firm Registration No. 216
	1205 Main Street
24	Garland, Texas 75040
	972.494.2000
25	Job No. 39166