

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

<p>CHET MICHAEL WILSON, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>FREEWAY INSURANCE SERVICES OF AMERICA, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 6:25-cv-1869-MC</p> <p>DECLARATION OF RYAN D. WATSTEIN IN SUPPORT OF DEFENDANT FREEWAY INSURANCE SERVICES OF AMERICA, LLC’S MOTION TO DENY CLASS CERTIFICATION</p>
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**DECLARATION OF RYAN D. WATSTEIN IN SUPPORT OF
DEFENDANT FREEWAY INSURANCE SERVICES OF AMERICA, LLC’S
MOTION TO DENY CLASS CERTIFICATION**

1. My name is Ryan D. Watstein. I am an attorney and co-founder of Watstein Terepka, LLP, an approximately 25-lawyer firm based at 75 14th Street NE, Suite 2600, Atlanta, Georgia 30309. I am over the age of 18, of sound mind, and competent to make this Declaration. I make this Declaration based on my personal knowledge.

2. I am counsel of record for Defendant Freeway Insurance Services of America, LLC (“Freeway”) in this action. Based on my active participation and supervision of all material aspects of the defense of this action and others, I have personal knowledge of the matters set forth herein.

3. As noted below, I have defended around 700 class actions in 30+ jurisdictions across the country as lead counsel. My firm and I also prosecute select class actions for plaintiffs.

Plaintiff’s Litigation History and Deposition Testimony

4. Attached hereto as Exhibit A is a true and correct copy of the Table of Cases Filed by Chet Wilson, which our team prepared based on our review of publicly available federal court dockets.

5. As reflected in that table, Plaintiff has filed nearly 100 putative TCPA class action complaints in federal courts across the country in less than two years.

6. At least 43 of those cases have already been settled or otherwise resolved before any class was certified.

7. I am not aware of a single Wilson case in which he has sought or obtained contested class certification. And my understanding, based on a conversation with Plaintiff's counsel, is that he has only obtained one class settlement.

8. Attached hereto as Exhibit B is a true and correct copy of the deposition transcript of Chet Michael Wilson, taken on December 12, 2025, in *Wilson v. Skopos Financial, LLC*, No. 6:25-cv-376 (D. Or.).

9. Attached hereto as Exhibit C is a true and correct copy of Wilson Dep. Exhibit 9.

10. Attached hereto as Exhibit D is a true and correct copy of Wilson Dep. Exhibit 10.

Plaintiff's Settlements

11. Over the course of my practice, I have defended somewhere around 700 class actions nationwide, probably around 600 of which were TCPA class actions. I have also handled well over a thousand non-class TCPA claims.

12. Based on that extensive experience, I know that, in the case of an individual settlement, plaintiff's counsel takes the vast majority of the recovery—often more than 90% and in some cases more than 99%. By definition, nothing goes to any class member in any such settlement.

13. Individual settlements in cases styled as TCPA “class actions” average \$50,000 or more each, depending on who the plaintiff's counsel is and a variety of other factors. It is not uncommon to see individual TCPA settlements over \$100,000 and some cases settle individually

for many multiples of that. In almost all instances, individual settlements are vastly in excess of the maximum statutory damages. This is what is known as the “extortion premium.”

Plaintiff’s Public Statements

14. On or about May 6, 2026, Plaintiff published a public video on Facebook captioned “Got some holes need filled boys & I need to know who’s with me on this one.”

15. In that video, Plaintiff made violent antisemitic statements, including referring to Jewish people as “parasites,” calling them “Bolshevik fu**ing jews,” and stating that he has “holes fu**ing dug already” for them.

16. The video was previously available at the following address:
https://www.facebook.com/story.php?story_fbid=27325585293726458&id=100001050671199.

After I told Plaintiff’s counsel that we would be including it in this motion, it was removed from the internet, as noted below.

17. Attached hereto as Exhibit E is a true and correct copy of a screenshot of that post.

18. Plaintiff has had posts removed from Facebook on more than a dozen occasions for “incitement to violence,” “hate speech,” “bullying,” and “harassment.” That is according to his own Instagram post, which actually shows the removed posts and that he has been suspended from Facebook for that reason.

19. He refers to Facebook derisively as “f*ggbook”—a homophobic slur—and has bragged publicly about being removed from the platform.

20. Attached hereto as Exhibit F is a true and correct copy of relevant Instagram posts reflecting these statements.

21. In a separate public Instagram post discussing his genetic ancestry results, Plaintiff bragged about not having “a fkn trace of knuckle dragger” in his genetic results.

22. Attached hereto as Exhibit G is a true and correct copy of that post.

23. According to a Google search I conducted, that term is a racist epithet used to evoke simian imagery against Black individuals.

24. That's not the worst of it. Talking about reparations to families of former slaves, Wilson said this on October 30, 2025:

So all you motherf***ers can suck a d*ck. F*** you mother***ers. Whining about how we owe you some f***ing sh*t ... F*** you dude. You lazy piece of sh*t. Get the f*** up and go get a job ... You were a slave before you got sold off. Your own f***ing people sold you off. How the f*** do I owe you sh*t? You mother f***ers didn't pick a Goddamn nothing off my f***ing trees. F*** you. I don't owe you sh*t. I don't owe you motherf***in sh*t. If anything, we gave you something better dude. You'd f***ing be named W*ngT*ng f***ing something in the f***ing, in a mud hut chucking spears in the brush motherf***er ... There ain't no white privilege. If anything, it's black privilege ... I ain't slaving my life away to feed you f***ing knuckle-dragging piece of sh*t. F*** you.

25. Attached hereto as Exhibit H is a true and correct copy of that post. The video is available at <https://www.instagram.com/p/DQcJsJBCY3k/?hl=en> (last accessed on May 15, 2026).

26. His vitriol and violent rhetoric also extends to the LGBTQ+ community. Speaking to parents of transgender people on October 23, he stated "I would love to punch some motherfuckers in the head. I would love it. But I'm smart. I ain't gonna fucking do stupid shit with witnesses. But, the time will come."

27. Attached hereto as Exhibit I is a true and correct copy of that post. The video is available at <https://www.instagram.com/p/DQKQERdDyvl/?hl=en> (last accessed on May 15, 2026).

28. Plaintiff also publicly operates and promotes a group devoted to helping people "circumvent[] taxation" and avoid what he characterizes as enslavement by the federal government.

29. Attached hereto as Exhibit J is a true and correct copy of a post reflecting those statements.

30. Wilson posts his 999-9999 number online, including on social media, and invites people to contact him on it.

31. Attached hereto as Exhibit K is a true and correct copy of an Instagram post reflecting an example of such a statement.

The Heidarpour Law Firm's Role in Plaintiff's Litigation

32. The Heidarpour Law Firm, PLLC ("Heidarpour") is a law firm based in the District of Columbia whose principal is Andrew Heidarpour.

33. Based on my firm's personal experience in dozens of Wilson cases and demand letters, Heidarpour plays a recurring behind-the-scenes role in originating and profiting from Plaintiff's TCPA lawsuits, even when other attorneys appear as counsel of record.

34. My firm has personally received demand letters from Heidarpour threatening Wilson TCPA claims against approximately one dozen of my clients that have not yet resulted in filed lawsuits.

35. Despite the Heidarpour Law Firm's financial interest in the outcome of Wilson's cases, it has almost never been disclosed as an interested entity in the Certificates of Interested Persons filed in those cases, or in similar certificates in cases in other districts. *See, e.g., Kotlarsz v. Platinum Choice Healthcare LLC*, 9:24-cv-80835, ECF No. 4 (S.D. Fla. July 9, 2024) (failing to disclose Heidarpour as an interested party, despite the fact that he originated the case); *Lyman v. Quinstreet*, 23-5056, ECF No. 3 (N.D. Cal. Oct. 3, 2023) (same); *see also* Ex. A.

Background on the Heidarpour Law Firm and Family's Litigation Practice

36. Public records show that Farideh Heidarpour, an employee of the Heidarpour Law Firm and the mother of Andrew Heidarpour, pleaded guilty in the Western District of Oklahoma to healthcare fraud. *See United States v. Heidarpour*, Case No. CR-11-109-M, ECF No. 146 (W.D. Okla. Aug. 14, 2012).

37. She admitted to executing a scheme that defrauded multiple federal agencies by willfully and intentionally billing for medical services that were never performed. *Id.*

38. She was sentenced to over a year in federal prison and was prohibited from participating in any provider that bills federal health benefit programs. *Id.*, ECF No. 194.

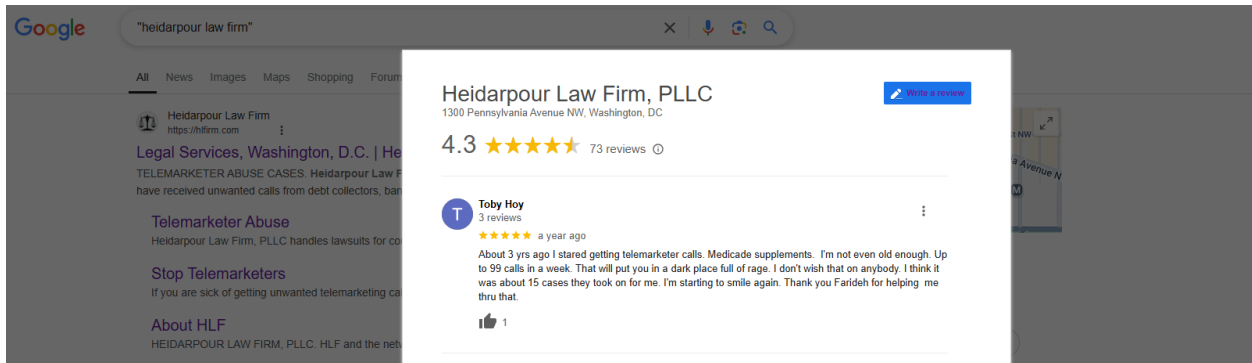
39. Farideh Heidarpour and a co-conspirator, also a member of the Heidarpour family, paid nearly \$1.7 million to resolve an accompanying False Claims Act civil case. *See United States ex rel. Lammers v. Heidarpour*, Case No. CV 08-3411 WHA (N.D. Cal.).

40. After Farideh Heidarpour's release from prison, the family entered the TCPA litigation business.

41. Fred Heidarpour—Andrew's father—converted Abante Rooter & Plumbing, Inc., a family-owned plumbing company, into what functioned as a TCPA claim mill. According to public federal court filings, Abante Rooter acquired over 20 telephone lines and filed more than 70 putative TCPA class actions in the Northern District of California alone, represented by the same plaintiff's counsel in each case. *See Abante Rooter v. Signify Health*, 2024 WL 1421279 (N.D. Cal. Apr. 2, 2024).

42. As mentioned above, Farideh Heidarpour now works at the Heidarpour Law Firm and, according to public reviews, appears to carry out much of the work of generating TCPA lawsuits associated with Heidarpour Law PLLC.

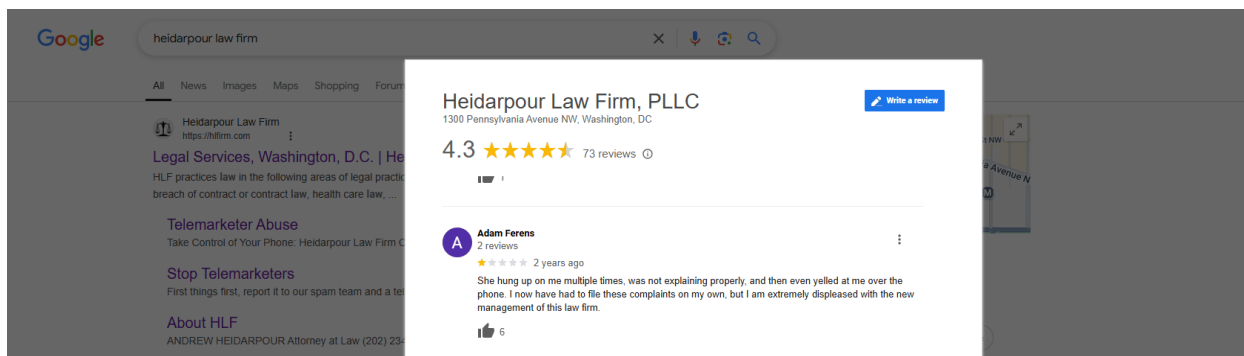
43. As demonstrated by the screenshots of Google reviews below, Ms. Heidarpour assists potential clients with their cases:



44. Neither Mr. Heidarpour's website, nor any other site located to date, identifies any other assistant, secretary, or intake coordinator, besides Ms. Heidarpour, nor any other female employee. No other female employee is mentioned by name in any of the more than 100 reviews we were able to find online.

45. Google reviews discuss additional conversations with a female employee that, given the lack of other female employees, appears to be Ms. Heidarpour:





Evidence of Manufactured Claims Referred by the Heidarpour Law Firm

46. Everything in this section of this declaration is based on public information or facts that have already been shared with opposing counsel. None of this waives any privilege or work product protection over our investigative files. With that said, based on my personal experience defending dozens of TCPA claims originated by the Heidarpour Law Firm on behalf of Wilson and other plaintiffs, I have observed a consistent pattern: false or meritless claims are packaged and referred to outside litigation counsel who may not know the claims' true provenance, and the claims are abandoned only when the underlying fraud is directly exposed.

47. Over the course of my practice, my firm has defended dozens of claims originated by the Heidarpour Law Firm. On numerous occasions, we discovered evidence that the lead forms underlying those claims appeared to have been filled out by the plaintiff himself or by someone with a financial interest in the litigation—in some instances through IP address evidence tracing the form submissions to the plaintiff's geographic location, including in at least one case a remote town with only a few thousand residents. When confronted with this evidence, outside litigation counsel—to whom the Heidarpour Law Firm had referred the cases—dismissed with prejudice in an attempt to avoid sanctions.

48. In addition to filed cases, my firm has received dozens of pre-suit demand letters from the Heidarpour Law Firm threatening TCPA class actions against my clients on behalf of Wilson and other plaintiffs. On multiple occasions, after we responded in writing, suggesting that we had evidence the claims were manufactured and describing what we believed to be an ongoing fraudulent scheme, the Heidarpour Law Firm abandoned the claim without any response. It disappeared entirely. To my knowledge, none of those abandoned claims were subsequently filed or referred to other counsel. Ever since we let the Heidarpour Law Firm know that we suspected fraud, not a single demand letter that we responded to (and thus that the Heidarpour Law Firm knew we were on the other side of) has resulted in a lawsuit. That was a marked change from before we told them about the suspected fraud, when they used to refer cases we responded to out to litigation counsel all the time.

49. More recently, the undersigned represented several defendants in cases brought by another serial plaintiff, Sara Taylor. The parallels to this case are shocking. After obtaining a new telephone number in 2024 and connecting with the Heidarpour Law Firm, Taylor became the named plaintiff in at least ten TCPA class action lawsuits in less than a year—after her number was submitted to dozens of companies through hundreds of lead forms designed to appear as though they came from Missie Gosset, a felon with multiple federal fraud convictions living roughly 100 miles away with a similar phone number. VPNs and remote-access tools were used to make the leads appear to originate from Gosset's hometown and IP address, though Gosset denied submitting the leads. When we shared those findings and the other information about the Heidarpour Law Firm described above, outside counsel dismissed both cases with no payment. Despite filing 25 back-to-back class actions before we revealed the suspected fraud, she never filed another case—her last filing was in August, 2025.

50. The Wilson cases are following this same pattern. Recently, the Heidarpour Law Firm sent one of the undersigned's clients a demand letter claiming Wilson received text messages in violation of the TCPA. But this instance proved that someone was not accidentally inputting Wilson's 999-9999 number into lead forms to avoid calls. That's because the *sole reason* someone would have entered their name into this lead form was to receive free timely stock alerts. Why would someone go to the trouble of putting a fake number into a lead form where the only point was to get texts? Proving the answer to our question, when confronted with this information, the outside counsel to which Heidarpour had farmed the claim dropped the claim completely.

51. The instances described above are representative of a broader pattern I have observed across dozens of matters. In case after case, claims originated by the Heidarpour Law Firm are abandoned with prejudice when the underlying facts are investigated and defense counsel shares its suspicion of fraud with opposing counsel.

Discovery Efforts to Investigate the Disputed Lead in this Case

52. To determine who submitted the contact request form, Freeway has served or will shortly serve targeted written discovery seeking information about Plaintiff's devices, phone records, IP addresses, iCloud access, communications with Heidarpour, Plaintiff's history of submitting contact request forms, and his broader TCPA litigation history. Freeway has also requested or will soon request a forensic inspection of every electronic device Plaintiff used during the relevant period, noticed Plaintiff's deposition, and served third-party discovery on Apple, Inc. and Plaintiff's phone carrier.

53. Freeway also attempted to locate Dorianne Plageman, whose name appeared on the contact request form. After conventional investigative means failed, Freeway retained a former FBI agent with approximately two decades of investigative experience. Drawing on that

experience, the investigator could not locate her remotely. He then traveled to both Orland and Oroville, California, spoke with multiple people associated with nearby addresses—including the manager of a mobile home park where Ms. Plageman reportedly lived—and still could not locate anyone who had heard of her.

54. Additional third-party subpoenas to the Heidarpour Law Firm (for records relating to how it originated and referred this claim and others) are forthcoming.

Plaintiff's Counsel's Response to this Motion

55. On April 8, 2026, I conferred with Plaintiff's counsel Andrew Perrong via Zoom regarding the relief sought in this motion—specifically, the denial of class certification on adequacy and predominance grounds. Mr. Perrong rejected the proposal. He claimed, inaccurately, that this Court had already found Wilson to be an adequate class representative. And as recently as this morning, Plaintiff's counsel intended to add claims and another defendant to this action.

56. On May 15, 2026, I again spoke with Mr. Perrong to confer about Plaintiff's request to add a new claim and a new defendant to this case. Mr. Perrong was again dismissive and was not interested in engaging in a discussion about his proposed amendment. Before we got off the call, I repeatedly asked him if he knew his client had posted hate speech online. He repeatedly refused to answer the question. He instead became furious and ended the call.

57. I then called Mr. Perrong's co-counsel, Anthony Paronich, who I know well. I told Mr. Paronich about the significant hate speech we had discovered online. I also told him that we were about to file our motion to deny class certification and that we would be addressing the Heidarpour Law Firm's and Wilson's involvement in what we believe is litigation fraud, and that we would be seeking discovery directly from the Heidarpour Law Firm to prove it. This

conversation occurred less than 24 hours after Freeway served dozens of discovery requests specifically aimed at investigating the suspected fraud.

58. In response, Mr. Perrong immediately emailed, offering to dismiss this case with prejudice, apparently trying to play their sudden about-face off as related to Plaintiff's hate speech, which had been occurring for years. Given that purported reason, we responded with something along the lines of "Great, since that's your concern, you will dismiss all of Mr. Wilson's cases then, right?" We also asked whether Plaintiff would agree to pay the expenses Freeway incurred preparing the motion to deny class certification that Mr. Perrong refused to agree to more than a month ago. Mr. Perrong immediately declined, presumably without ever speaking with his client about it. The email chain is here:

Plaintiff's counsel:

Counsel,

As I understand from Ryan's conversation with Anthony, attached is a proposed stipulation of dismissal with prejudice for this litigation that we are willing to file today. Otherwise, we intend to file a motion to dismiss the case with prejudice.

Defense counsel:

Will you be dismissing all Wilson cases and conceding he is inadequate to serve as a class representative?

Plaintiff's counsel:

We will not. If you will not sign the stipulation, we will file a motion.

Defense counsel:

We have to talk with our client. One more question though: will Plaintiff agree to pay our fees and expenses—including most importantly those we spent preparing our motion to deny class certification after you flippantly rejected our arguments when we conferred over a month ago?

Plaintiff's counsel:

You mean the meet and confer in which you used multiple *ad hominem* insults against me, and without your local counsel present? We will not agree to pay any fees or expenses.

Plaintiff's counsel:

Following up here. We intend to file the motion by close of business Eastern today.

Defense counsel:

I'll ignore the false statements below that I understand you are making out of desperation. We told you about our motion several months ago. In fact, I think we conferred twice, if I'm not mistaken. Now you have entirely changed your mind—after we incurred the enormous expense of briefing the issue—and want an answer on a few-hour turnaround on a Friday afternoon. That's reasonable. We will get back to you when we are able.

59. Almost immediately thereafter, Mr. Perrong filed a motion to dismiss Plaintiff's own case with prejudice. When I pointed out that it contained several false representations about the above exchange, he hurriedly withdrew that motion without prejudice, indicating they would re-file it after they heard back definitively from us on whether we would agree to let them dismiss the case with prejudice.

Plaintiff's Attempt to Delete or Hide Evidence

60. In the meantime, the undersigned continued to ready this motion for filing. When we went to insert links to Plaintiff's hate speech, we discovered that multiple links had been taken down, including the video where Plaintiff threatened Jewish people with violence. The link now says "This content isn't available right now." See https://www.facebook.com/story.php?story_fbid=27325585293726458&id=100001050671199 (last accessed May 15, 2026).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 16, 2026 in Atlanta, Georgia.

/s/ Ryan D. Watstein
Ryan D. Watstein

EXHIBIT A

Case Caption	Date Filed	Court	Disposition	Plaintiff's Attorney	Certificate of Interested Parties
Wilson v. Atria Grp. Distr. Co., No. 1:24-cv-1917	2024-10-09	E.D. Va	Notice of Settlement 05/13/2025	Anthony Paronich, Dana Oliver, Avi Kaufman	
Wilson v. Prof. Credit Serv., No. 6:24-cv-1826	2024-10-31	D. Or.	Stip of Dismissal 05/29/2025	Anthony Paronich, Andrew Perrong	
Wilson v. Elevate Patient Fin. Sols., LLC, No. 4:24-cv-4285	2024-11-04	S.D. Tex.	Notice of Settlement 05/07/2025	Anthony Paronich	CIP NOT FILED, even though there was court order to file
Wilson v. Avid Ratings, Inc., No. 3:24-cv-782	2024-11-04	W.D. Wis.	Stip of Dismissal 06/02/2025	Anthony Paronich	
Wilson v. Nationstar Mortg. LLC, No. 6:24-cv-1855	2024-11-07	D. Or.	In discovery as of 02/23/2026	Anthony Paronich, Andrew Perrong, Dana Oliver	
Wilson v. PacifiCorp, No. 6:24-cv-1956	2024-11-21	D. Or.	Notice of Settlement 02/13/2026	Anthony Paronich, Dana Oliver, Avi Kaufman, James Stranch, IV, Nathan Ring, Alex Phillips	
Wilson v. Credit Suite Inc., No. 8:24-cv-2711	2024-11-21	M.D. Fla.	Stip of Dismissal 07/14/2025	Avi and Rachel Kaufman	
Wilson v. The Savings Bank Mutual Life Ins. Co. of Mass., No. 1:24-cv-12950	2024-11-26	D. Mass.	Notice of Settlement 09/11/2025	Anthony Paronich	
Wilson v. Disability Help Grp., No. 0:24-cv-62319	2024-12-07	S.D. Fla.	Stip of Dismissal 03/03/2026	Avi and Rachel Kaufman, Dana Oliver	
Wilson v. S. Or. Credit Serv., Inc., No. 1:24-cv-2087	2024-12-17	D. Or.	Still pending as of 02/23/2026	Anthony Paronich, Andrew Perrong	
Wilson v. Lower, No. 1:24-cv-3665	2024-12-18	D. Md.	Notice of Settlement 05/02/2025 Transferred to W.D. Tenn. 03/26/2025 Stipulation of Dismissal 12/23/2025	Anthony Paronich, John Thomas McGowan, Jr.	CIP NOT FILED
Johnson & Wilson v. Am. Home Shield Corp., No. 1:24-cv-2339	2024-12-20	E.D. Va. / W.D. Tenn		Anthony Paronich, William Robinson, III	
Wilson v. Fairway Independent Mortg. Corp., No. 3:24-cv-924	2024-12-27	W.D. Wis.	Stip of Dismissal 07/30/2025	Anthony Paronich	
Wilson v. Icon Creative Consulting, Inc., No. 1:24-cv-25119	2024-12-30	S.D. Fla.	Notice of VD 02/19/2025	Avi and Rachel Kaufman	
Wilson v. Club 1 Hotels, LLC, No. 1:25-cv-3	2025-01-02	N.D. Ill.	Notice of VD 04/23/2025	Anthony Paronich	
Wilson v. AUM Ins. Servs. LLC, No. 3:25-cv-260	2025-01-07	N.D. Cal.	Notice of VD 08/10/2025	Anthony Paronich, Dana Oliver	CIP NOT FILED
Wilson v. Zillow, No. 2:25-cv-48	2025-01-08	W.D. Wash.	Notice of Resolution 05/19/2025	Avi Kaufman, Eric Draluck	
Wilson v. Cent. Med. Grp. E., LLC, No. 6:25-cv-43	2025-01-09	D. Or.	Still pending as of 02/23/2026	Anthony Paronich, Andrew Perrong, Dana Oliver	
Wilson v. KUIU, LLC, No. 2:25-cv-212	2025-01-15	E.D. Cal.	Notice of VD 08/22/2025 Transferred to N.D. Ohio 03/17/2025	Anthony Paronich, Dana Oliver	
Wilson v. LeafFilter N., LLC, No. 2:25-cv-39	2025-01-16	S.D. Ohio	Stip of Dismissal 05/07/2025 (settled)	Anthony Paronich, Brian Giles	
Wilson v. Easy Spirit, LLC, No. 3:25-cv-112	2025-01-22	D. Conn.	Seeking appeal	Anthony Paronich	
Wilson v. Blendjet Inc., No. 2:25-cv-278	2025-01-23	E.D. Cal.	Notice of VD 03/07/2025 (w/o prejudice)	Anthony Paronich, Dana Oliver	
Wilson v. Kaiser Found. Health Plan, Inc., No. 3:25-cv-802	2025-01-23	N.D. Cal.	Stip of Dismissal 01/26/2026	Rachel Kaufman, Dana Oliver	CIP FILED, Heidarpour not listed
Wilson v. Trajectory Inc., No. 1:25-cv-23	2025-01-23	N.D. Fla.	Notice of Settlement 06/26/2025	Avi Kaufman	
Wilson v. Hard Eight Nutrition LLC, No. 6:25-cv-144	2025-01-28	D. Or.	Stip of Dismissal 02/10/2026	Anthony Paronich, Andrew Perrong	
Wilson v. CMRE Fin. Servs., Inc., No. 6:25-cv-152	2025-01-28	D. Or.	Still pending as of 02/23/2026	Anthony Paronich, Andrew Perrong	
Wilson v. Fleet Fin., Inc., No. 1:25-cv-340	2025-01-31	D. Colo.	Stip of Dismissal 02/10/2026	Anthony Paronich	
Wilson v. Finmax Smart Cap. LLC, No. 6:25-cv-173	2025-01-31	D. Or.	Notice of Settlement 01/26/2026	Anthony Paronich, Andrew Perrong	
Wilson v. Pharmacerent LLC, No. 0:25-cv-60212	2025-02-06	S.D. Fla.	Notice of Settlement 01/22/2026	Avi and Rachel Kaufman	
Wilson v. Blue Moon Fabrics, No. 6:25-cv-333	2025-02-27	D. Or.	Notice of Settlement 04/25/2025	Anthony Paronich, Andrew Perrong	
Wilson v. Consumer Cellular Inc., No. 2:25-cv-745	2025-03-04	D. Ariz.	Settled 04/02/2026	Avi Kaufman	
Wilson v. Skopos Fin. LLC, No. 6:25-cv-376	2025-03-04	D. Or.	MSJ denied	Neal Weingart, Patrick Peluso	
Wilson v. Norco, Inc., No. 6:25-cv-410	2025-03-09	D. Or.	Notice of VD 02/08/2025	Anthony Paronich, Andrew Perrong	
Wilson v. Roman Health Ventures Inc., No. 1:25-cv-3479	2025-04-27	S.D.N.Y.	Notice of Settlement 09/19/2025	Anthony Paronich	
Wilson v. Mountinside Fitness Acquisition LLC, No. 2:25-cv-1481	2025-05-01	D. Ariz.	Discovery	Anthony Paronich, Gupta Wessler	
Wilson v. Craftie Fox, Inc., No. 1:25-cv-22069	2025-05-08	S.D. Fla.	Notice of VD 07/24/2025	Avi and Rachel Kaufman	
Wilson v. Medvidi Inc., No. 5:25-cv-3996	2025-05-19	N.D. Cal.	Settled 03/06/2026	Anthony Paronich, Dana Oliver	CIP FILED, Heidarpour not listed
Wilson v. MAH Grp., Inc., No. 6:25-cv-855	2025-07-02	D. Or.	Discovery	Anthony Paronich, Andrew Perrong	
Wilson v. Inogen, Inc.	2025-07-06	D. Or.	Stip of Dismissal 11/20/2025	Anthony Paronich, Andrew Perrong	
Wilson v. Better Mortg. Corp., No. 1:25-cv-5503	2025-07-06	S.D.N.Y.	Notice of VD 02/24/2025	Anthony Paronich	
Wilson v. Atlanta Med. Day Spa & Surgery Ctr., LLC, No. 25-4023	2025-07-21	N.D. Ga.	Discovery		CIP FILED, Heidarpour listed
Wilson v. AMP FIT, Inc., No. 3:25-cv-1741	2025-07-21	D. Or.	Discovery	Anthony Paronich, Valerie Chinn	
Wilson v. Home Warranty of Am., Inc., No. 6:25-cv-1331	2025-07-29	D. Or.	Notice of Settlement 12/19/2025	Anthony Paronich, Andrew Perrong	
Wilson v. Roof Max Techs., No. 2:25-cv-872	2025-08-06	S.D. Ohio	Notice of Settlement 10/15/2025	Anthony Paronich, Brian Giles	
Wilson v. Nat'l Gen. Ins. Co., No. 1:25-cv-719	2025-08-07	M.D.N.C.	Discovery	Anthony Paronich, Ryan Duffey	
Wilson v. Tabak Law LLC, No. 2:25-cv-1197	2025-08-11	E.D. Wis.	Notice of VD 10/29/2025	Anthony Paronich	
Wilson v. Liberty Home Guard LLC, No. 1:25-cv-1075	2025-08-11	N.D.N.Y.	Stip of Dismissal 01/09/2026	Anthony Paronich	
Wilson v. Monarch Recovery Mgmt., Inc., No. 2:25-cv-4845	2025-08-24	E.D. Pa.	Discovery	Andrew Perrong	
Taylor & Wilson v. Savvy Ins. Sols., LLC, No. 1:25-cv-12393	2025-08-29	D. Mass.	Notice of Settlement 01/20/2026	Anthony Paronich	
Wilson v. Lifestation, Inc., No. 1:25-cv-7246	2025-08-30	S.D.N.Y.	Discovery	Anthony Paronich	
Wilson v. Inbox Health Corp., No. 3:25-cv-1417	2025-09-02	D. Conn.	Notice of Resolution 11/24/2026	Anthony Paronich	
Wilson v. Disability Servs. of Am., LLC, No. 1:25-cv-10578	2025-09-03	N.D. Ill.	Notice of VD 12/1/2025	Anthony Paronich	
Wilson v. McNeil & Meyers Rec. Mgmt. Grp., LLC, No. 2:25-cv-1810	2025-09-04	E.D. La.	Notice of VD 01/23/2026	Anthony Paronich, Joseph David Address	No CIP filed
Wilson v. Vozzcom, Inc., No. 0:25-cv-61793	2025-09-05	S.D. Fla.	Class Cert Motion to be filed 04/16/2026 Still pending as of 02/23/2026; motion to stay class discovery filed 02/13/2026 based on P's many filings	Avi and Rachel Kaufman	
Wilson v. MIA Aesthetic Holdings, LLC, No. 1:25-cv-24103	2025-09-09	S.D. Fla.		Avi and Rachel Kaufman	
Wilson v. TRA Med. Imaging Found., No. 3:25-cv-5808	2025-09-10	W.D. Wash.	Discovery	Avi Kaufman, Eric Draluck	
Wilson v. Nissan N. Am., Inc., No. 3:25-cv-1042	2025-09-16	M.D. Tenn.	Discovery	Avi Kaufman, Susan S. Lafferty	
Wilson v. Get Away Today, Inc., No. 6:25-cv-1716	2025-09-23	D. Or.	Notice of VD 10/21/2025	Andrew Perrong	
Wilson v. TPH Paralegal Prof. Corp., No. 6:25-cv-1703	2025-09-23	D. Or.	Discovery	Andrew Perrong	
Wilson v. Lumen Techs. Inc., No. 3:25-cv-1471	2025-10-02	W.D. La.	Notice of Settlement 01/23/2026	Anthony Paronich, Joseph David Address	No CIP filed
Wilson v. Freeway Ins. Servs. Am., LLC, No. 6:25-cv-1869	2025-10-12	D. Or.	Discovery	Andrew Perrong	
Wilson v. GameChanger247, LLC, No. 6:25-cv-1870	2025-10-12	D. Or.	Discovery	Anthony Paronich, Andrew Perrong	
Wilson v. Salespromis, LLC, No. 9:25-cv-81268	2025-10-14	S.D. Fla.	Discovery	Avi and Rachel Kaufman	
Wilson v. Cirkul Inc., No. 6:25-cv-2036	2025-11-02	D. Or.	Objections to MTD	Anthony Paronich, Andrew Perrong	
Wilson v. Cont'l Tire the Ams., LLC, No. 6:25-cv-2052	2025-11-04	D. Or.	Stip of Dismissal 02/18/2026 (w/o prejudice)	Anthony Paronich	
Wilson v. Coverright Ins. Servs. Inc., No. 1:25-cv-6357	2025-11-17	E.D.N.Y.	Stip of Dismissal 02/18/2026 (w/o prejudice)	Anthony Paronich	
Wilson v. Mortg. One, Inc., No. 3:25-cv-3648	2025-12-17	S.D. Cal.	MTD pending	Anthony Paronich, Dana Oliver	
Wilson v. Dealmed Med. Supplies, LLC, No. 1:26-cv-9	2026-01-02	E.D.N.Y.	Discovery	Anthony Paronich	
Wilson v. Autoweb, Inc., No. 4:26-cv-39	2026-01-04	N.D. Cal.	Settled 03/25/2026	Anthony Paronich, Dana Oliver	CIP FILED, Heidarpour not listed
Wilson v. The HELOC Co., No. 8:26-cv-25	2026-01-05	D. Md.	Discovery	Andrew Perrong, John Thomas McGowan, Jr.	No CIP filed
Wilson v. AnyTime Fitness Franchisor, LLC, No. 6:26-cv-19	2026-01-06	D. Or.	Voluntary dismissal	Andrew Perrong	
Wilson v. Yakima Valley Farm Workers Clinic, No. 1:26-cv-3003	2026-01-07	E.D. Wash.	Discovery	Anthony Paronich, Samuel Strauss	
Wilson v. Gen. Audit Corp., No. 3:26-cv-207	2026-01-27	N.D. Ohio	Discovery	Anthony Paronich, Brian Giles	
Wilson v. Pyxis Sols., No. 6:26-cv-344	2026-02-22	D. Or.	Discovery	Andrew Perrong	
Wilson v. HomeLand Ins. LLC, No. 6:26-cv-345	2026-02-22	D. Or.	Discovery	Andrew Perrong	
Wilson v. Wayfair Inc.	2026-03-24	D. Mass.	Discovery	Anthony Paronich	
Wilson v. AMS Moving Inc.	2026-03-25	S.D. Fla.	Dismissed with prejudice	Avi Kaufman	
Wilson v. Staples, Inc.	2026-03-29	D. Mass.	Pre-Answer	Anthony Paronich	
Wilson v. Umpqua Health Alliance, LLC	2026-04-03	D. Or.	Pre-Answer	Andrew Perrong	
Wilson v. Cascades Ins. LLC	2026-04-03	D. Or.	Pre-Answer	Andrew Perrong	
Wilson v. Med. Air Servs. Assoc., No. 6:26-cv-666	2026-04-03	D. Or.	Pre-Answer	Andrew Perrong	

EXHIBIT B

December 12, 2025

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

EUGENE DIVISION

CHET WILSON, individually and on behalf of all others similarly situated,

Plaintiff,

v.

Case No.: 6:25-cv-00376

SKOPOS FINANCIAL, LLC d/b/a REPRISE FINANCIAL,

Defendant.

AND ALL RELATED CROSS-ACTIONS.

VIDEOCONFERENCE DEPOSITION OF CHET MICHAEL WILSON

FRIDAY, DECEMBER 12, 2025

9:02 AM

APPEARING REMOTELY FROM

EUGENE, OREGON

REPORTED BY:

Cheryl L. Haase
NCRA RPR No. 12443/WA CCR No. 3503
(541)409-2190 - cheryl.haase@gmail.com

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A-P-P-E-A-R-A-N-C-E-S

For the Plaintiff:

PELUSO LAW, LLC
865 Albion Street, Suite 250
Denver, Colorado 80220
(720) 805-2008

By: Patrick Peluso
ppeluso@pelusolawfirm.com
(Pro Hac Vice)

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Heath, Texas 75032
(972) 345-2626

By: Dunham Biles
dunham@bileswilson.com
(Pro Hac Vice)

Also Present
Julia Coons, Paralegal

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1 REPORTED REMOTELY FROM LINN COUNTY, OREGON

2 FRIDAY, DECEMBER 12, 2025

3 9:02 AM

4

5 CHET MICHAEL WILSON,

6 called as a witness,

7 having been first duly affirmed,

8 was examined and testified as follows:

9

10 EXAMINATION

11 BY MR. BILES:

12 Q. Good morning, Mr. Wilson.

13 A. Good morning.

14 Q. Could you please state your full name for the
15 record?

16 A. Chet Michael Wilson.

17 Q. And Mr. Wilson, have you ever had your deposition
18 taken before?

19 A. Yes, sir.

20 Q. Okay. How many times?

21 A. For these matters, this will be the third time, I
22 believe.

23 Q. And when you say "these matters," what do you
24 mean?

25 A. The TCPA.

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1 Q. When was the last time you had your deposition
2 taken in a TCPA case?

3 A. Roughly a week ago.

4 Q. Okay. And what case was that?

5 A. It was -- I forget the exact name of the company,
6 it was a mortgage company, I believe.

7 Q. Were you working with any other plaintiffs in that
8 case?

9 A. I believe there was one other plaintiff on that
10 case with me.

11 Q. Okay. Is that Sara Taylor?

12 A. Yes, sir.

13 Q. Who is Sara Taylor?

14 A. What's that?

15 Q. Who is Sara Taylor?

16 A. She was a co-plaintiff, if that's the correct
17 wording for it.

18 Q. She's a co-plaintiff on several cases with you,
19 right?

20 A. I am not certain. I deal --

21 Q. Sorry. Go ahead.

22 A. I deal with numerous of these cases, so it's hard
23 to, you know, get the names exactly with them, so --

24 Q. Who is Antwane Johnson?

25 A. I know the name's really familiar, but I -- I'm

1 not certain.

2 Q. He's a co-plaintiff with you on cases, isn't that
3 correct?

4 A. I just -- I recognize the name. I can't specify
5 exactly.

6 Q. You have so many cases you don't recognize all the
7 ones you have with Antwane, is that right?

8 A. Yeah, I have a lot going on, so --

9 Q. How many TCPA cases do you have going on?

10 A. I'm not sure which are pending or still active,
11 but there's upwards of somewhere around 70, 69, 70,
12 something like that.

13 Q. So that 70 would be ones, that's you think the
14 grand total of number of cases you've ever filed under the
15 TCPA including ones that are active and ones that are no
16 longer active?

17 A. I believe that's fairly accurate, yes.

18 Q. Approximately how many of those are currently
19 active?

20 A. I am not certain.

21 Q. When did you first file your TCPA case?

22 A. It was around a year ago, I think.

23 Q. So in a year you've filed approximately 70 TCPA
24 cases as a plaintiff, is that correct?

25 A. I -- I think that's -- that's fairly accurate.

1 Q. Okay. How many of those have been concluded in
2 one way or another?

3 A. I think somewhere around 20 or so. I don't have
4 the exact number.

5 Q. And were those all concluded by settlement?

6 A. I -- I think there was a few that were dismissed,
7 but yeah, that's -- that's correct.

8 Q. Approximately how many do you believe were
9 settled?

10 A. Some in the 20 area, somewhere -- something like
11 that.

12 Q. How much did you get paid?

13 MR. PELUSO: Objection. I'm going to object
14 to the relevance of that, you know, a lot of these
15 settlements obviously are going to be confidential.

16 BY MR. BILES:

17 Q. Sir, would you answer the question, please?

18 A. Will you repeat it so I get it accurately again?

19 Q. Yeah. How much have you received in settlement
20 cases on TCPA cases?

21 MR. PELUSO: Same objection.

22 A. I am not certain to an accurate number, so --

23 BY MR. BILES:

24 Q. Is it more than a hundred thousand?

25 A. I don't believe so, no.

1 Q. Is it more than 10,000?

2 A. Yes.

3 Q. Okay. More than 50,000?

4 A. I think we're getting close to somewhere in there.
5 I'm not certain.

6 Q. Okay. And what are the terms of the agreement
7 with your counsel in this case should you -- should this
8 case be concluded?

9 A. I -- I believe we're going off of the claim
10 standards as far as TCPA actions, so I'm not certain the
11 entirety of it, but --

12 Q. What does that mean to you?

13 A. From my understanding it's -- it's 500 per
14 infringement, and then if it's -- if it's intentional, it's
15 \$1,500 per incident, so --

16 Q. What I -- well, let me ask you: Are you paying
17 your attorney on an hourly basis?

18 A. No, sir.

19 Q. So it's a contingency fee, correct?

20 A. Yes. Yes. I -- yes.

21 Q. What percentage does your lawyer get?

22 MR. PELUSO: Objection to the relevancy.

23 I -- I think we've turned over the retainer agreement, so
24 you already have the terms.

25

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1 MR. BILES: I don't think I have it, but --

2 MR. PELUSO: If not, I'm happy to turn it
3 over.

4 MR. BILES: Okay. That will be sufficient.
5 BY MR. BILES:

6 Q. And, sir, just to back up and talk about
7 depositions for a minute, you understand you're under oath
8 today, correct?

9 A. Yes, sir.

10 Q. And what I'm going to ask of you for the benefit
11 of our court reporter, actually, is that I will ask
12 questions and if you would let me finish the question before
13 you respond, and then you'll respond and I will do my best
14 not to interrupt you.

15 Your -- your lawyer may object at some point,
16 and the reason why we need to do this is our court reporter
17 is trying to get literally every single word we say down.

18 And so if we speak over each other, we make
19 our court reporter's job impossible and annoying. So can we
20 agree to do our best not to speak over each other?

21 A. Yes, sir.

22 Q. And then I'd ask you that if I ask you a question
23 and you don't understand it, will you let me know?

24 A. Yes, sir.

25 Q. If you don't say you don't understand it, can we

1 agree that that means you did understand the question?

2 A. Yes, sir.

3 Q. Okay. And then the way this works, of course,
4 today is -- at any point if you'd like a break, just let me
5 know. We all have to use the restroom, we all may need
6 food, whatever.

7 Let me know and I'll do my best to grant it
8 right then. The exceptions to that are like if I literally
9 have a question pending to you, I'm going to need you to
10 answer it before we take a break, and it may be a situation
11 where I have a few more questions I want to finish in a line
12 before I agree to take a break.

13 Does that work for you?

14 A. Yes, sir.

15 Q. Now, what if anything did you do to prepare for
16 this deposition today?

17 A. I just -- I reviewed the documents with the texts
18 again that were from the defendant and just previously went
19 over things.

20 Q. What documents did you review?

21 A. The complaints, the dismissal, that paperwork that
22 was overturned, and I believe that there's a few documents
23 in there, I don't remember the exact titles of them, so --

24 Q. And when you say you briefly went over things,
25 what did you mean?

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1 A. Well, I briefly went over them with Mr. Peluso.

2 Q. Okay. Now, let's be -- let's be clear about this
3 today. I may ask you if you met with your counselor, so
4 forth, but there's almost no chance I want to know anything
5 about what your counsel told you or what you told your
6 counsel. So let's -- you understand?

7 A. Yes. Yes.

8 Q. When did you meet with Mr. Peluso --

9 A. I spoke --

10 Q. -- about the deposition?

11 A. I spoke with him briefly this morning.

12 Q. Did you otherwise speak with Mr. Peluso about your
13 deposition before some time this morning?

14 A. We also had a brief conversation yesterday. Just
15 basically going over the same stuff, just making sure I
16 was --

17 Q. I don't -- I don't -- honestly, I promise you I
18 don't need to know about your communications with your --
19 I'm just asking you when you met with him, and I'll ask you
20 how long you met with him. I'm not going to ask you what
21 you discussed with him. Okay?

22 A. Okay.

23 Q. That's -- I don't want to know.

24 A. Okay.

25 Q. Okay. So how long did you speak to Mr. Peluso

1 yesterday?

2 A. I'd say 15, 20 minutes, maybe.

3 Q. Okay. Did you speak with your attorney or anyone
4 else in preparation for your deposition other than the
5 conversation you had yesterday and the one you had this
6 morning?

7 A. I don't believe so.

8 Q. Did you speak with any of your other lawyers who
9 are not part of this case about this deposition?

10 A. I don't believe so.

11 Q. Of those 70 cases, does Mr. Peluso represent you
12 in any of those other than this one?

13 A. I believe this is the first time I've worked with
14 Mr. Peluso.

15 Q. How did you come to contact Mr. Peluso?

16 A. Excuse me?

17 Q. How did you come to contact Mr. Peluso about this
18 case?

19 A. I was -- he was referred to do the litigation from
20 my -- the law firm that I deal with, mostly, so Heidarpour.

21 Q. How do you get in contact with Heidarpour? I
22 forget how to pronounce them, but that law firm initially?

23 A. I did a web search for TCPA and that's who it
24 pulled up, so --

25 Q. Now, are they the law firm that you've given

1 access to your cell phone to go back five years and searched
2 for all the text messages?

3 A. Sir, to be accurate, I have -- there's several
4 attorneys that I deal with on these cases, so I just don't
5 want to be inaccurate. I'm not certain who specifically
6 I've dealt with on all these, but it's -- I have -- there's
7 a group of attorneys that are all under the kind of same
8 umbrella.

9 Q. Who are those attorneys under that umbrella?

10 A. So we have -- we have Anthony Paronich. We have
11 Andrew Heidarpour. I know -- and then I'd -- I think
12 there's a guy, Mr. Berrong that I was dealing with, too.
13 Yeah, they're all underneath kind of the same group, they
14 all work together, so --

15 Q. And do all of them have access to your Cloud
16 account for your phone number (541) 999-9999?

17 A. I -- I'm not certain on how that works, so --

18 Q. Okay. Can you tell me every cell phone number
19 you've had since January 1, 2024?

20 A. It's been this phone number.

21 Q. You don't have any other phone numbers?

22 A. No, sir.

23 Q. Where is that cell phone right now?

24 A. It is in my bathroom.

25 Q. When is the last time you called somebody on it?

1 A. I spoke with Mr. Peluso this morning.

2 Q. Is there a reason why you haven't given me your
3 cell phone records so I could verify that you actually use
4 that phone?

5 A. Is there a reason why I hadn't given it to you?

6 Q. Yeah. I've requested them, right?

7 Let me ask you this: Did you see the
8 document request that I sent?

9 A. For my cell phone?

10 Q. For documents in this case, I sent what we call a
11 Request for Production of Documents. Did you review that
12 document?

13 A. I'm assuming so. I -- I didn't -- I don't
14 remember that exact detail though so.

15 MR. BILES: Okay. Julia, will you pull that
16 document up, please? Go ahead and give us Exhibit 1.

17 MS. COONS: Yes, sir. One moment.

18 BY MR. BILES:

19 Q. While she's doing that, sir, is it correct that
20 you received something like 50 to 70 texts a day that you
21 consider violations of the TCPA?

22 A. I can't --

23 MR. PELUSO: Objection to the extent it calls
24 for a legal conclusion. Go ahead.

25 A. I can't answer to the exact number. You know,

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1 because it varies. It's kind of random. But I'd say I get
2 at least probably 15 to 20 a day and some serious days
3 potentially upward of, you know, 50, 60, 70, you know. But
4 I'd say that's more of a --

5 MR. BILES: Julia, you can hang on now. You
6 can hang off. That's fine. We can have it up there.

7 BY MR. PELUSO:

8 Q. Let's just finish this question, then we'll put it
9 up there. Okay. So when you receive one of those texts, as
10 I understand it your lawyers already know about it, because
11 they have access to your account just the same as you do,
12 right?

13 MR. PELUSO: Objection to the form. It's
14 leading, lacks foundation.

15 BY MR. BILES:

16 Q. You can answer, sir.

17 A. I -- I don't know the process of how that works
18 exactly.

19 Q. Well, do you contact your lawyers and say, Look, I
20 just received another text, sue somebody?

21 MR. PELUSO: Objection to the extent
22 attorney-client privilege, you've already told him you don't
23 want to hear what he says to his lawyers.

24 BY MR. BILES:

25 Q. I'll -- do you initiate contact with your

1 attorneys when you receive a text that you consider to
2 violate the law?

3 A. Yes, I send screenshots of my -- of my messages.

4 Q. And in regards to -- let's make sure. I believe
5 you -- you have sued over four texts in this case, correct?

6 A. Yes, sir. Well, I -- I believe at least four,
7 yes.

8 Q. Out of more than four?

9 A. I'm not certain.

10 Q. Okay. There's no voicemails, though, right?

11 A. Not to my memory, no.

12 Q. There were no phone calls either, correct?

13 A. I can't speculate to that.

14 Q. Are you suing Reprise based on them having called
15 you?

16 A. I don't believe so.

17 Q. You're suing them only because of the text
18 messages that you've alleged in the lawsuit, correct?

19 A. From my understanding.

20 Q. Someone other than you have a better understanding
21 of what you're claiming?

22 A. Well, I know at times I received more in the
23 process of litigation, so at this time I'm not certain.

24 Q. Julia, why don't you put up the doc request now.

25 Okay. Mr. Wilson, this is, as you'll see

1 towards the top right, it says, "Defendant's First Request
2 for Production to Plaintiff."

3 A. Yes.

4 MR. BILES: I will mark this as Exhibit 1.
5 (Deposition Exhibit No. 1 was
6 marked for identification.)

7 BY MR. BILES:

8 Q. And I'm happy to have Julia walk you, scroll
9 through this document. But my -- my question really is only
10 have you ever seen this document?

11 A. Yes, it looks familiar.

12 Q. Okay. Do you have an issue with producing to me
13 your phone records from September of 2024 to present?

14 MR. PELUSO: Objection to the form.

15 A. I leave -- I leave all, you know, legal stuff like
16 that, I'd have to correspond with my representation (sic).

17 BY MR. BILES:

18 Q. Okay. What kind of -- who's your carrier
19 currently? Your cell phone carrier, just to be clear?

20 A. Verizon.

21 Q. And who was your carrier at the time that you
22 received the texts that this lawsuit is based on?

23 A. I've used Verizon as long as I can remember.

24 Q. And what type of account do you have with Verizon,
25 by which I mean what do you, how are you being charged?

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1 A. I have a prepaid account.

2 Q. Okay. What -- what does a prepaid account mean?

3 A. It's just without the contract. And it ends up, I
4 think it's cheaper with the same benefits, so --

5 Q. And I assume like -- like me, you have unlimited
6 text messaging?

7 A. Yes, sir.

8 Q. And you're not paying per phone call, right?

9 A. Nothing specifically, it's all included, all
10 inclusive.

11 Q. And so you're not paying for each text message
12 received, correct?

13 A. That's accurate.

14 MR. BILES: Julia, would you put up the --
15 what we'll mark as Exhibit 2, Plaintiff's Responses and
16 Objections to Defendant's First Set of Requests to Produce.

17 (Deposition Exhibit No. 2 was
18 marked for identification.)

19 MS. COONS: Yes, sir, one moment.

20 BY MR. BILES:

21 Q. All right, sir, can you see this document is
22 titled "Plaintiff's Responses and Objections to Defendant's
23 First Set of Requests to Produce"?

24 A. Yes. I'm reading it now.

25 Q. Yeah. Have you seen this document before today?

1 A. I believe so, yes. It looks familiar.

2 MR. BILES: Julia, if we go to Page 5 of that
3 document -- can you go to Page 5 of that document, and can
4 you make this big enough that everybody can read it?

5 And maybe they can, I don't know. I need to
6 make mine bigger. Oh, now, I can. I had my screen too
7 small.

8 BY MR. BILES:

9 Q. All right, sir. If we look at Request No. 7, it
10 says, "All documents that evidence" -- whoa.

11 Okay. "All documents that evidence, refer or
12 relate to any opt-out messages, (e.g., 'STOP'), consumer
13 complaints, carrier complaints, or regulatory submissions
14 made by Plaintiff regarding the alleged messages, and any
15 responses or outcomes."

16 And then the response says, "Plaintiff
17 possesses no responsive documents." Is it correct that you
18 have no responsive documents?

19 A. To clarify, that would be of any action I had
20 taken to opt out of the messages, is that correct?

21 Q. That is one of the things requested, yes.

22 A. And we're talking specifically about the Request
23 No. 7, correct?

24 Q. We're -- and we're specifically talking about
25 Reprise and Reprise -- we're only talking about this

1 lawsuit, not your other --

2 A. Yes.

3 Q. So is it correct that you did not respond to those
4 messages at all?

5 A. Yes, that is true. And --

6 Q. Go ahead?

7 A. I -- I've found in the past that when I do respond
8 it's more of click bait, and a lot of these companies,
9 they'll wait until they find an actual person to respond,
10 and then you get inundated with ten times as much stuff.

11 So, you know, from my past experience, it
12 doesn't -- it's a very rare occasion when actually replying
13 "Stop" works.

14 Q. Did you apply to Reprise, "Stop"?

15 A. If --

16 Q. Did you apply "Stop" to Reprise's text messages?

17 A. No, sir, I did not.

18 Q. And at that point in time how many TCPA lawsuits
19 had you filed?

20 A. Once again, I'm not certain, exact number.

21 Q. Approximately how many?

22 A. Upwards of 70.

23 Q. Okay. Based on your knowledge, how many text
24 messages would it take from Reprise before you could
25 possibly sue them?

1 MR. PELUSO: Objection, calls for a legal
2 conclusion.

3 MR. BILES: I'm just asking his -- his
4 knowledge based on 70 cases.

5 A. I believe it's more than one.

6 BY MR. BILES:

7 Q. Okay. And you already told us this, but remind us
8 again how statute damages are calculated in the TCPA case.

9 A. From my understanding is if they are intentional,
10 it's \$1,500. If they are found not intentional, it's 500.

11 Q. So if you'd applied "Stop" on the first text you
12 received from Reprise, and if Reprise didn't send another
13 text, you wouldn't have a lawsuit, would you?

14 MR. PELUSO: Objection, calls for a legal
15 conclusion. Go ahead.

16 A. If -- if you're -- I mean, if it's actually how it
17 works. You know, a lot of these companies I've seen
18 completely the opposite, so I can't speculate on what would
19 happen. So --

20 BY MR. BILES:

21 Q. And for each text they send you, you think you get
22 more money, right?

23 A. Yes, depending on the terms.

24 Q. So to be clear, you didn't respond "Stop" because
25 you wanted a lawsuit and you wanted more money, correct?

1 MR. PELUSO: Objection, mischaracterizes
2 testimony, leading.

3 BY MR. BILES:

4 Q. You may answer, sir.

5 A. It's -- I don't believe that's accurate at all,
6 because I've taken every step that I can to try to get rid
7 of these telemarketer phone calls. And that's what has
8 brought me here, prior to me knowing anything about TCPA
9 action.

10 Q. You said you took every step possible to stop text
11 messages from Reprise and other lenders, correct?

12 A. From anyone harassing me on my phone that's not --
13 that I'm not expecting to contact me, yes. This has been
14 five years plus I've been dealing with this. And just now
15 I've finally come to a situation where it's -- something's
16 being done about it.

17 Q. What steps did you take to stop text messages that
18 you are complaining of from coming in?

19 A. When I first received the phone, I started
20 blocking every phone number that called me that wasn't
21 somebody that I recognized, and I just got overwhelmed with
22 that.

23 At that point, I -- I called, made sure that
24 the phone number was on the Do Not Call registry and which
25 it was and it still is.

1 And then after a matter of years of dealing
2 with this, you know, feels like parasites harassing me all
3 day long, every day, I can't answer phone calls, I can't
4 text people, I can't listen to music without my phone going
5 off.

6 So I did a web search, and -- and I think we
7 went over this fact, it -- it led me to this law firm that's
8 now helping me fix the situation, so to speak.

9 Q. You said when you received the phone. That's not
10 really accurate, is it?

11 A. When I received the phone number, yes.

12 Q. Yeah. You bought it, right?

13 A. I --

14 MR. PELUSO: Objection to the form.

15 BY MR. BILES:

16 Q. Did you buy the phone number, sir?

17 A. I did not buy the phone number.

18 Q. You traded a title to a vehicle for it, correct?

19 A. Yes, because for one, it was probably the only way
20 I'd ever get compensation for the vehicle, because there had
21 been no payments made. And the specific person had a
22 problem paying his bills is why I gave him the title for the
23 number.

24 And I thought that it was a neat number that,
25 you know, my friends, family and people in my life would be

1 able to recognize easily. So I was -- I was attracted to it
2 for that reason.

3 Q. When did you acquire the number, sir?

4 A. On or about 2019, 2018, 2019, somewhere in there.

5 Q. And from whom did you acquire it?

6 A. It was an acquaintance of mine, a friend named
7 Warren Brownlee.

8 Q. And where does Mr. Brownlee live?

9 A. I'm not certain, I haven't heard from him for
10 years.

11 Q. Where did he live at the time?

12 A. He lived in Florence, Oregon, where I lived.

13 Q. Do you know Mr. Brownley's date of birth?

14 A. No, sir.

15 Q. Can you spell his name for the record, please?

16 A. I -- I believe this is correct, it's W-A-R-R-E-N,
17 and last name is Brownlee, B-R-O-W-N-L-E-E.

18 Q. So when you say you -- well, let's back up. How
19 exactly did you exchange title for the phone number? How
20 did that transaction happen?

21 A. Okay. He called me. Actually the number showed
22 up on my phone, I didn't have it in my contacts. And I
23 almost didn't answer it, I thought it was fake. So I
24 answered the phone and Warren was like, Hey, what's up, man?

25 And I said, What's going on with this phone

1 number? How are you calling me from this? Is it fake or
2 what?

3 And he said, No, it's not fake, it just got
4 generated to him. Because he didn't pay his bill, got a new
5 phone. And so it got generated to him, so I was thinking
6 about it.

7 I told him, I said, Hey, you owe me on the --
8 on the car. If you give me, if you port the number over to
9 me, I'll just give you the title to that car that you owe me
10 on and we can be done with this.

11 And he agreed and that was the end of it.

12 Q. How much did he owe you on the car?

13 A. It was somewhere around a thousand, I believe.
14 Give or take.

15 Q. I'm sorry, what was your friend's last name?

16 A. Brownlee.

17 Q. Did Mr. Brownlee tell you anything about that
18 phone number?

19 A. He didn't tell me anything, no.

20 Q. Did he complain about receiving solicitations?

21 A. No, sir.

22 Q. When did you register the (541) 999-9999 number on
23 the Do Not Call Registry?

24 A. I -- I don't have a specific date. I'm not
25 certain. I'd have to look back at the records. I think I

1 do have that information somewhere.

2 Q. What year?

3 A. I believe, I mean, it's between 2019 and 2021, so
4 I'm not sure the exact time when, you know, how long I took
5 after blocking all the numbers didn't work, so --

6 Q. When -- when did you -- when did you first become
7 concerned that you were receiving text messages that you
8 didn't want to receive?

9 A. Almost instantly.

10 Q. Since you acquired the phone number, approximately
11 how many text messages do you think you receive on a daily
12 basis, that you object to?

13 A. I'd say at the very least ten, so --

14 Q. So -- go ahead.

15 A. Anywhere from ten to, you know, 50, 60 a day, you
16 know, so it varies.

17 Q. So those ten to 50 to 60 a day, you -- you find to
18 be unauthorized solicitations, is that right?

19 A. That's accurate.

20 Q. So for approximately six years you've been
21 receiving ten to 60 text messages a day that you consider
22 inappropriate solicitations, correct?

23 A. That's accurate.

24 Q. And yet you didn't change your phone number,
25 correct?

1 A. That's correct, for various reasons.

2 Q. Okay. What various reasons did you choose not to
3 change your cell phone number for?

4 A. For one, my life is driven by networking and my --
5 my collection of people that -- and resources. So between
6 that, my family, and everybody that's important to me, it's,
7 you know, in a way it's a special phone number because all
8 my family, my children, everybody can remember my phone
9 number, without having to look it up.

10 And so that's, you know, the main benefit to
11 me is, you know, I have this collection of people I care
12 about that depend on access to me. Some of which I might
13 not even have their contact, just in passing, and so I think
14 that I'd -- yeah, at this point the number's a part of -- a
15 part of my life, so --

16 Q. Any other reasons?

17 A. No, sir.

18 Q. Let's go back. You just mentioned networking is a
19 part of your life, is that correct?

20 A. That's true.

21 Q. And you've been convicted of distribution of
22 cocaine, correct?

23 MR. PELUSO: Objection to the relevance.

24 A. I believe everything is in documents that you've
25 been provided.

1 BY MR. BILES:

2 Q. No, that would be incorrect. I -- I may have the
3 documents, it's not because you gave them to me, you
4 objected to them. But have you been convicted of a felony?

5 Well, in the last ten years have you been
6 convicted of a felony?

7 A. No, sir.

8 Q. Have you been convicted of any crimes in the last
9 ten years?

10 A. Just traffic.

11 MR. PELUSO: Objection again to the
12 relevance.

13 BY MR. BILES:

14 Q. Go ahead, sir.

15 A. I don't know if it's considered a crime, but only
16 traffic stuff.

17 Q. So you haven't been convicted of possession of
18 marijuana?

19 A. In the last -- no, sir, in the last ten years? I
20 don't believe so.

21 Q. How is networking part of your life today?

22 A. For one, I'm a holistic healer. I get people off
23 pharmaceuticals, help them deal with cancer and all kinds of
24 different things.

25 I know some world healers that have helped me

1 along that path of knowledge. I, yeah, just a lot of all my
2 food is sourced through farms and through people that have
3 ranches and I try to circumvent commercial food and sources.
4 I just, yeah, there's a lot, lot of different reasons why
5 networking is important, so I'm being self reliant, not
6 depending on everybody else or anyone else for what I need,
7 so --

8 Q. What if anything is your current job?

9 A. I do not have a current job. I have an online
10 health food, health store. But that's more education than
11 anything else, so I just -- I like sharing stuff with
12 people, it's not about monetary.

13 Q. When is the last time you were employed?

14 A. I had -- I owned a moving company that I ended up
15 dissolving around 2020.

16 Q. What was the name of the moving company?

17 A. It's called Barter Movers.

18 Q. And how long were you affiliated with Barter
19 Movers?

20 A. I had -- it was about, I'd say about five years.

21 Q. Why did you dissolve it?

22 A. For one, the COVID thing messed up a lot of my
23 work. And multiple injuries, it was hard for me to do that
24 hard of manual labor so I got ride of my equipment.

25 Q. Where do I find your online health store? What's

1 the web site?

2 A. It is tank, T-A-N-K, dot, cultureforgood.com.

3 Q. And are you able to earn any money from that

4 online health store?

5 A. I've say -- maybe made, I've made under a hundred

6 dollars probably for the whole time. I usually just order

7 the stuff and then just resell it to my friends personally,

8 so --

9 Q. What does -- what does the term "tank" mean to you

10 in the sense of why do you use "tank?"

11 A. A while back I bought a bunch of military stuff.

12 I trade, barter and trade military equipment, like

13 decommissioned military stuff, like auction stuff. And so

14 everybody -- I'm a bigger guy and everybody just started

15 calling me Tank, so --

16 Q. Where do you live currently?

17 A. I live in Eugene, Oregon.

18 Q. What's the address?

19 A. It is 29798 Willow Creek Road.

20 Q. Is that a house, apartment, condo?

21 A. Townhouse.

22 Q. Townhouse. And do you own the townhouse?

23 A. No, sir. I just rent.

24 Q. How much is your monthly rent?

25 A. Roughly 2600.

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1 Q. And are you married?

2 A. No, sir.

3 Q. Do you have any kids?

4 A. I have six children.

5 Q. And do those six kids live with you?

6 A. I have three full time.

7 Q. And how old are the three?

8 A. Thirteen, eight and five.

9 Q. And the other three that you do not have
10 full time, where are they?

11 A. One is 19 and then the other two are with their
12 mothers.

13 Q. Are they with their mothers full time?

14 A. Yes, during the school year, yes. During the
15 summer, I have them full time also.

16 Q. I assume you have to pay child support, correct?

17 A. Yes, I'm actually working with my ex right now,
18 we're getting it all dissolved, so -- and, yeah.

19 Q. So how do you earn sufficient money to pay for
20 your rent, children, your other needs?

21 A. I was --

22 MR. PELUSO: Objection to the relevance.

23 A. Yeah, I have -- I have, you know, multiple assets
24 that I can liquidate at any time. Many resources that I've
25 collected over the years and kind of squirreled away for

1 myself and so, yeah, I'm doing pretty well for myself.

2 BY MR. BILES:

3 Q. Do you have any income besides selling assets?

4 A. No, sir.

5 Q. When is the last time you had an income, other
6 than from selling off assets?

7 A. The moving company.

8 Q. Okay. Before -- before the moving company, what
9 was your last employment before that?

10 A. I had -- it's kind of always been the same thing,
11 just networking, barter, trading. You know, I lived a lot
12 of my life without needing any kind of money or anything
13 because of my collection of people. I have everything I
14 need at my fingertips, so --

15 Q. Between -- after you shut down the moving company,
16 we know you generate money from selling assets, correct?

17 A. Yes.

18 Q. Settling TCPA cases?

19 A. Come again?

20 Q. You also generate income from settling TCPA cases,
21 right?

22 A. If that's considered an income, I guess, yes.

23 Q. Okay. You -- you have money come in to you by
24 selling assets and settling TCPA cases, correct?

25 A. Correct.

1 Q. Anything else?

2 A. No, sir.

3 Q. Let's go back and just do some basic background.

4 Where did you go to high school?

5 A. Siuslaw, Florence, Oregon.

6 Q. Did you graduate?

7 A. Yes, sir.

8 Q. When did you graduate?

9 A. 2000.

10 Q. And what did you do after you graduated? Did you
11 go to college, did you get a job, join the military, what?

12 A. I did -- I worked with concrete a lot, pumping
13 concrete, forms, foundations, construction stuff.

14 Q. Okay. And how long did you do that for?

15 A. Maybe a couple years max.

16 Q. And then what did you do after that?

17 A. Then I started throwing events, charity events,
18 festivals, gatherings. And I kind of got into the holistic
19 medicine scene.

20 Q. How -- where is the money coming from for you to
21 be able to throw events?

22 A. I -- I've always just kind of bartered and traded
23 up so, you know, vehicles I trade for better stuff or, you
24 know, so I've really done amazingly well, even in my younger
25 years straight out of high school, just, you know, trading

1 vehicles and stuff like that, like the Barter Kings.

2 Q. You've mentioned holistic medicine a few times
3 now. So do you have any degrees, certificates, other things
4 that -- in regard to holistic medicine?

5 A. No, I think western medicine has missed -- missed
6 the target for a long time now, and I've just done a lot of
7 my own research and I know some world healers that have
8 taught me a lot of stuff about the simplicity of how your
9 body works, and how to escalate your level of existence so,
10 with natural stuff.

11 Q. So I've asked you about sources of money, income,
12 what have you. You haven't listed holistic medicine. Is
13 that because you're not generating money from holistic
14 medicine?

15 A. That's accurate.

16 Q. So in -- in what way are you practicing holistic
17 medicine?

18 A. Through education. And giving folks the resource
19 after they get the knowledge to make the choice on what kind
20 of fuel they would like to put in their body to -- to, you
21 know, get rid of deficiencies, which I believe are the basis
22 of most disease is based on a deficiency.

23 Q. Are you charging for that?

24 A. No. My compensation is watching people be healed
25 and learn about themselves.

1 Q. All right. So I'm just trying to get your work
2 history. So from -- you graduated in 2000, for a couple
3 years you did construction?

4 A. Yes.

5 Q. And then you got into throwing events, is that
6 right?

7 A. Yes, sir.

8 Q. Did that financially support you in some way?

9 A. Yeah, I made -- I made some pretty good money
10 doing that.

11 Q. What kind of -- okay. And how, for what period of
12 time did you financially support yourself through throwing
13 events?

14 A. I mean it's hit and miss because that's an
15 industry you can't really depend on always making money on,
16 but, you know, on and off for a decade after high school.

17 Q. I'm going to give you a chance to just -- because
18 this is just background stuff, I'll give you a chance just
19 to give me a narrative. Between 2000 when you graduated and
20 today --

21 A. Mm-hmm.

22 Q. -- other than what we've covered, what jobs,
23 professions, et cetera, were you involved in to earn a
24 living?

25 A. Very few. I've always been dependent on myself,

1 followed a different route rather than the nine to five, and
2 it's -- I don't know, it's set me up in a situation where
3 I'm not dependent on the government. I'm not dependent on
4 anyone else to provide for my family, because like I said
5 before, it's -- my network provides everything for me. Just
6 a phone call away.

7 Q. I understand being independent. But, I mean,
8 there are many ways to be independent. You can own a
9 business, you can -- what have you, but how are you
10 generating the ability to take care of yourself other than
11 there was a period of time where you did construction?

12 A. Yes.

13 Q. You did some events which is according to you hit
14 and miss and whether that works out well.

15 A. Mm-hmm.

16 Q. Then you -- you're buying and selling collectibles
17 or other things.

18 A. Yeah.

19 Q. And you settled some lawsuits. Is there anything
20 else that you were doing to make money?

21 A. That's -- I think that's -- I'm sure there's more,
22 but that's about -- that's all that I can think of.

23 Q. Okay. Are you on any medications today?

24 A. No, sir.

25 Q. Is there any reason that you would not be able to

1 testify truthfully today?

2 A. No, sir.

3 Q. Have you been diagnosed with any mental, emotional
4 issues?

5 A. No, sir.

6 Q. Do you know Brian [REDACTED]?

7 A. I do not know Brian [REDACTED].

8 Q. Have you ever communicated with Brian [REDACTED]?

9 A. Absolutely not.

10 Q. Do you know anybody who does know Brian [REDACTED]?

11 A. Who does know Brian [REDACTED]? Nope, not to my
12 knowledge.

13 Q. Because you paused for a minute when I asked you
14 if you knew Brian [REDACTED]?

15 A. I don't -- I wasn't trying to, I think I didn't
16 hear you correctly.

17 Q. Have you ever indirectly communicated with
18 Mr. [REDACTED]?

19 A. No, sir.

20 Q. Do you know any of his family members?

21 A. No, sir.

22 Q. Do you have -- strike that.

23 A. I believe the first time I heard of Brian [REDACTED],
24 the full name, was in -- yeah, in this situation, in this
25 case, so --

1 Q. You said full name. Were you familiar with less
2 than his full name prior to this case?

3 A. Whose full name?

4 Q. You said the first time you heard of Brian [REDACTED],
5 you became familiar with his full name was in regard to this
6 litigation. Did you somehow know of his name separate and
7 apart of this litigation?

8 A. Well, in the text messages from the defendant, it
9 stated Brian, so --

10 Q. So when you received those text messages you knew
11 they weren't intended for you, correct?

12 A. Yes, sir.

13 Q. And you didn't respond "Stop," correct?

14 A. Like I said, I believed it was click bait.

15 Q. It was yes or no. Did you or did you not respond
16 with "Stop"?

17 A. I did not respond with "Stop."

18 Q. Did you respond saying, Hey, you got the wrong
19 person?

20 A. There was no response.

21 Q. And in this lawsuit you've alleged that Reprise is
22 an auto lender, correct?

23 A. Reprise is an auto lender?

24 Q. Yeah.

25 A. I don't know if that's all that they lend, I'm not

1 certain.

2 Q. Do you know if they lend on autos at all?

3 A. I -- I'm not certain if what they -- what all they
4 lend on.

5 Q. Did you review the complaint before it was filed?

6 A. Yes.

7 MR. BILES: Julia, let's go ahead and mark
8 Exhibit 3 and let's go through some issues with the
9 complaint.

10 (Deposition Exhibit No. 3 was
11 marked for identification.)

12 BY MR. BILES:

13 Q. All right. Mr. Wilson, do you recognize this
14 document?

15 A. Yes.

16 Q. And you reviewed it before it was filed?

17 A. Yes, sir.

18 Q. So if we go to Page 3, Paragraph 8, do you see
19 that you allege that "Reprise is an auto-loan lender based
20 in Texas"?

21 A. Yeah. Yes, sir.

22 Q. What's your basis for that assertion?

23 A. Well, it's -- I believe that -- was had to do with
24 the investigation on my attorney's part.

25 Q. So you don't have any knowledge, personal

1 knowledge of what Reprise is in the business of doing, is
2 that correct?

3 A. No, sir.

4 Q. This is the problem with double negatives. When
5 you say, "No, sir," let me ask you, do you have personal
6 knowledge about what Reprise is in the business of doing?

7 A. Just lending. I believe that's all.

8 Q. But you don't know what type of lending?

9 A. I think it's just one of those databases connected
10 with like Lending Tree that connects with a bunch of
11 different people to give a loan. I'm not certain what all
12 they do loans for but, you know.

13 Q. Let's go down to Paragraph 11. I'm sorry, I got
14 the wrong number. 14, please.

15 Sir, if you can look at Paragraph 14, I'll
16 read it first, "Unfortunately for consumers, Defendant casts
17 its marketing net too wide. That is, in an attempt to
18 promote its business, Defendant conducted (and continues to
19 conduct) a wide-scale telemarketing campaign that repeatedly
20 sends unsolicited telemarketing text messages to consumers'
21 cellular telephones, including to those whose numbers are on
22 the National Do Not Call Registry who did not provide prior
23 express invitation or permission to receive such messages."

24 A. Yes, sir.

25 Q. Did I read that correctly?

1 A. Yes, sir.

2 Q. What's the basis of your personal knowledge in
3 regard to that paragraph?

4 A. That the process of the way the defendant uses had
5 the telemarketing campaign is too broad to where it includes
6 people that are not involved whatsoever with their company,
7 or not requesting any kind of interaction.

8 Q. But what factual basis do you have to make that
9 allegation? How do you know that?

10 A. Well, because I never -- I never contacted the
11 business, and I never asked for this contact, and I'm the
12 one that's forced to deal with it, so --

13 Q. But as far as you know, have personal knowledge
14 of, you're the only person that happened to, right?

15 A. Yes, that's as far as my personal knowledge, but I
16 would assume there's more.

17 Q. Okay. So it's just an assumption, correct?

18 A. That's correct.

19 Q. You're aware that Brian [REDACTED] consented to
20 receive text messages, correct?

21 A. I'm not certain if he consented to text messages.
22 I do understand that he was the one that -- that put my
23 phone number into the database thinking it was fake.

24 Q. So why are you suing Reprise for Mr. [REDACTED] having
25 entered your number?

1 A. Because I was the one that had my privacy violated
2 because of it and -- yeah.

3 Q. Any other reasons for it?

4 A. It's -- it's just a hassle. You know, it's -- you
5 know, hopefully in the end of this we can change the way
6 that the defendant operates, and more people won't be
7 bothered by similar situations.

8 MR. BILES: Okay. Well, Julia, why don't you
9 pull up the four text messages with the Wilson Bates number
10 on them.

11 We have a better copy, don't we? Or, yeah,
12 maybe not. Maybe that's the right one. All right. I'm
13 sorry, Court Reporter. I forget, are we now on Exhibit 4, I
14 think?

15 MR. PELUSO: Yeah.

16 THE REPORTER: I can look.

17 MR. BILES: You're on mute.

18 THE REPORTER: Sorry. My automatic -- my
19 automatic counter is not working, so --

20 MR. BILES: That's okay. I think -- I think
21 Patrick and I agree we're on 4.

22 MR. PELUSO: Yeah, I think you're on --
23 you're on 4. You did sort of two versions of the request to
24 produce, one that you served, one was the responses, then
25 the complaint, now this, that's 4.

1 MS. COONS: And I'm on No. 4 as well.

2 MR. BILES: Julia, it's most important
3 because you have to keep track of this, because you, after
4 this is all over you have to send the court reporter the --

5 MS. COONS: Yes. Yes, sir, and Madam Court
6 Reporter, if you wouldn't mind putting the email in the chat
7 so I know where to send, at your earliest convenience.

8 Thank you.

9 BY MR. BILES:

10 Q. All right. So, Mr. Wilson, this is a document
11 that has a Bates label at the end that's Wilson a bunch of
12 zeroes and then a six. Do you see that?

13 A. Yes.

14 Q. Do you understand that's a Bates label meaning
15 that it was produced -- well, in this -- it was produced in
16 this case?

17 A. For the court, right, or for this litigation here.

18 THE REPORTER: I can't hear you all of a
19 sudden. Can you speak up, Mr. Wilson?

20 THE WITNESS: Yes. Can you hear me?

21 THE REPORTER: Yeah. You need to speak up.
22 For some reason you went really quiet.

23 THE WITNESS: Okay. Yeah, I -- I just
24 assumed that number is, you know, attached for litigation
25 for the document.

1 BY MR. BILES:

2 Q. Yes. Mr. Wilson, do agree that these are the four
3 text messages that you are suing over?

4 A. That looks accurate.

5 Q. Okay. Do you see that the very first one says,
6 "TXT STOP to Stop messages from this number"?

7 A. I see that.

8 Q. And that's in the second text message as well?

9 A. Yes.

10 Q. Third text message as well?

11 A. Yes.

12 Q. And the fourth one?

13 A. Yes.

14 Q. Now, by the way, I showed you the document
15 requests earlier and your responses. Can you tell me what
16 if anything you did to locate documents to produce in this
17 case?

18 (Deposition Exhibit No. 4 was
19 marked for identification.)

20 A. I believe that's a screenshot from my phone that I
21 sent, and I'm assuming I sent the link attached to it. I
22 don't know if that answers --

23 BY MR. BILES:

24 Q. Well, you produced some other documents, and so
25 what did you do to go try to find documents that you have

1 that were to be produced by you through your lawyer?

2 A. I usually -- I usually just when I find a text
3 like that, I usually do a search on my phone to see what
4 other interactions there are, and I produce all documents to
5 the law firm.

6 Q. Okay. Did you -- did you -- did you search your
7 emails for any communications with Brian [REDACTED]?

8 A. I don't know Brian [REDACTED]. No.

9 Q. Did you search your Facebook for any of your posts
10 that were relevant to this case?

11 A. No, sir. I don't believe there's any relevant to
12 this case.

13 Q. Okay. You did offer to sell your -- your cell
14 phone number, correct?

15 MR. PELUSO: Objection to the form.

16 A. Yes, years ago there was a brief period of time I
17 was in correspondence with someone interested in purchasing
18 it.

19 BY MR. BILES:

20 Q. When was that?

21 A. I -- I can't remember the exact dates.

22 Q. It was on Facebook Marketplace, is that correct?

23 A. Yes, I did -- I did put it on Facebook Marketplace
24 for a period of time.

25 Q. And you said you were willing to accept nothing

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1 less than \$20,000, correct?

2 A. I don't -- I'm not sure if that's the wording, but
3 that's -- I was offered 20,000 but it never panned out.

4 MR. BILES: Julia, can you pull up that
5 document, please.

6 BY MR. BILES:

7 Q. Mr. Wilson? You're Chet Wilson; right?

8 A. That is me.

9 Q. And that's your phone number, correct?

10 A. Correct.

11 MR. BILES: We'll mark this -- we'll mark
12 this as Exhibit 5.

13 (Deposition Exhibit No. 5 was
14 marked for identification.)

15 BY MR. BILES:

16 Q. And you posted this; correct?

17 A. Yes, sir.

18 Q. Okay. And you said it was "a once in a lifetime
19 opportunity to own the coolest number ever," right?

20 A. Yes, sir.

21 Q. You said you "gave a car title up for the number,"
22 correct?

23 A. That's correct.

24 Q. We covered that, is that correct?

25 A. Yes.

1 Q. So you were owed about a thousand dollars on the
2 car, so you swapped the debt and title in exchange for a
3 number, for this number, correct?

4 A. Yes, I believed I would never get payment any
5 other way, so that was -- yeah.

6 Q. And then you say, "I passed up 20,000 already so
7 unless it sells over that, I'm in no hurry to part with it."
8 Is that correct?

9 A. That's correct.

10 Q. And do you know what year this was?

11 A. It was not -- it wasn't long after I had acquired
12 the number. Within the year probably. Yeah.

13 Q. Would you sell the number today?

14 A. Would I sell it?

15 Q. Yeah.

16 A. Well, at that point I hadn't connected that phone
17 number with as many people, so it didn't have a personal
18 value to me. But no, I -- I wouldn't sell it at this point.
19 I have too many people connected to it.

20 Q. And you make too much money off of it, right?

21 MR. PELUSO: Objection to the form.

22 A. To tell you the truth, if -- if I could use my
23 phone, I'm fine without this money. If I could use my phone
24 without being harassed every day, I'd be more than happy to
25 have a regular cell phone that's -- so, yeah, I don't think

1 that has any bearing on my keeping the phone number.

2 BY MR. BILES:

3 Q. Did you review your Facebook post before this
4 deposition?

5 A. Yes, I believe those are attached in one of the
6 documents.

7 Q. I have no idea what that means, attached to what
8 documents?

9 A. I know that there's some Facebook posts. Well, I
10 have, I believe there was a couple Facebook posts that were
11 attached to this litigation.

12 Q. Attached to what in this litigation?

13 A. As part of the discovery? I don't know the legal
14 stuff, but I remember seeing a couple pictures of my
15 Facebook stuff attached, what I believe, I think it was this
16 particular litigation. As you know, I have many.

17 Q. Yes, I do. Now, you keep -- let me ask you this:
18 You don't actually call anybody based on memorizing their
19 phone number these days, do you?

20 A. Very few.

21 Q. Because it's easier and faster to go to your phone
22 and select the number, right?

23 A. Unless you have a phone number like mine.

24 Q. You think people just dial your number, don't go
25 to their phone?

1 A. Yeah.

2 Q. With their contacts?

3 A. Lot of time.

4 Q. Mm-hmm. Wouldn't be very hard for the rest of us
5 to call anyone else just using our phones right, we don't
6 memorize phone numbers anymore?

7 A. No, I -- but like --

8 MR. PELUSO: Objection to the form.

9 A. You know, my --

10 BY MR. BILES:

11 Q. Go ahead.

12 A. I know there's a lot of times people don't have
13 their phones with them, especially my children or family
14 members or whatever, and it's been very helpful. I've, you
15 know, I've encountered some situations where someone
16 memorizing my number has helped them a great deal, so --

17 Q. How many phone numbers do you have memorized?

18 A. Maybe ten, 15 numbers.

19 Q. That's nine more than me, but, okay. Or 14 more
20 than me.

21 A. That's how we used to have to do it all the time.

22 Q. I know, especially people my age. So for the --
23 for the fact that a few people have your number memorized,
24 you wouldn't sell it for 20,000?

25 A. You know, money isn't as value to me as -- as

1 having those connections and, you know, like I said, I --
2 you know, I've lived my life without having to worry about
3 exchanging cash, you know. A lot of my life surrounds just
4 barter and trade and having people that I've helped out that
5 are willing to help me out and vice versa.

6 It's just -- it's really nice not having to
7 deal with the structured society a lot of the time.

8 Q. What social media accounts do you have, sir?

9 A. I have two Facebooks, an Instagram, and that's the
10 majority, that's my social media.

11 Q. So what are the two Facebook pages?

12 A. It's the Chet Tank Wilson and there's another one
13 that's Tank tha Dank, T-H-A --

14 Q. Wait. It's just T-I-N-K T-H-E T-A-N-K?

15 A. T-H-A is the Tank Tha Dank, with an A., not E.

16 Q. And what's your Instagram page?

17 A. Bunker Plot.

18 Q. Any other social media?

19 A. That's all I use.

20 Q. Do you communicate with other people about
21 bringing TCPA suits besides your own lawyers?

22 A. No, I've referred some people towards the process.
23 Other people that were being harassed. And with no details
24 of any specific case or anything of that nature.

25 Q. And you've referred them to your own lawyers, is

1 that correct?

2 A. No, not -- just in general, the process. You
3 know, so --

4 Q. Who if anybody have you spoken to about your
5 lawsuit against Reprise besides your lawyers?

6 A. Absolutely no one.

7 Q. Not Sara -- it's not Sara Taylor?

8 A. I have no direct communication with Sara Taylor
9 whatsoever.

10 Q. Ever?

11 A. Not that I --

12 Q. You have never heard of Sara Taylor in your life?

13 A. I don't believe so.

14 Q. You never communicated with Sara Taylor in your
15 life?

16 A. Uh -- no, I don't think so.

17 Q. How about Antwane Johnson? You ever communicated
18 with Antwane?

19 MR. PELUSO: Objection, the relevance of
20 this. Neither one of those people is a plaintiff in this
21 case.

22 BY MR. PELUSO:

23 Q. I might make them a witness depending on what
24 Mr. Wilson told them. Those would be admissions.

25 A. I've never spoken to any one of those people

1 whatsoever about this case or any matter to my recollection.

2 Q. Never spoken to your own kids about your case?

3 A. I mean, there's no reason why I'd ever talk to
4 them about details of this case. They wouldn't even be
5 interested.

6 Q. Okay. So you've never spoken to anybody other
7 than your lawyers in any way, and I see you -- let's back
8 up.

9 You've never communicated with anybody,
10 literally anybody besides your lawyers about your case
11 against Reprise?

12 A. Not to my knowledge, no.

13 Q. How much money are you looking for from Reprise?

14 A. Whatever the statutes direct, you know, whatever
15 the Judge thinks fair.

16 MR. BILES: Can we take like a ten-minute
17 break? I've got to use the restroom.

18 MR. PELUSO: Sure.

19 (Recess.)

20 MR. BILES: Julia, would you put up D11?

21 MS. COONS: Yes. One moment. Which will be
22 Exhibit 6. You said E11?

23 MR. BILES: The conviction table.

24 MS. COONS: Okay. Got It. Thank you. Yes,
25 sir.

1 (Deposition Exhibit No. 6 was
2 marked for identification.)

3 BY MR. BILES:

4 Q. All right. Mr. Wilson, I've gone through your
5 criminal history and I've attempted to limit it down to
6 actual convictions.

7 A. Okay.

8 Q. Can you review this and tell me, one, if there's
9 any of these that is wrong, and then two, if there's any I
10 left out.

11 MR. PELUSO: Just going to lodge a standing
12 objection. I'm not going to keep jumping in every time with
13 a relevance objection. It will be too choppy, but to all
14 the questions related to criminal history, I object as to
15 the relevance.

16 MR. BILES: Understood.

17 A. I mean, it looks all accurate.

18 BY MR. BILES:

19 Q. So --

20 A. I don't believe there's anything missing.

21 Q. So we go down below -- so we go to 6, we get,
22 "Possession of Marijuana," correct?

23 A. Yes, sir.

24 Q. And then 7 is "Manufactured/delivery of a
25 controlled substance, Schedule 1. Do you see that?

1 A. Yes.

2 Q. Can you tell me what that was?

3 A. I'm not sure what the exact thing was. This was
4 all -- actually all that -- there was evidence planted on me
5 for that one. I don't know if that's relevant. But, yeah,
6 I don't know -- I don't now what the exact 7 or 8 are.

7 Q. Okay. For the items that are listed at 7 and 8,
8 though, you were convicted, correct?

9 A. Correct.

10 Q. Do you agree that all 1 through 16 are things that
11 you were convicted for?

12 A. Looks accurate.

13 Q. Okay. Now, Mr. Wilson, earlier we showed you the
14 four text messages -- actually, Julia, why don't you just
15 put those back up.

16 This has got to be Exhibit 3 if my
17 recollection is right. No, it's -- well, it doesn't matter.

18 MS. COONS: I have it as Exhibit 4.

19 MR. BILES: As what?

20 MS. COONS: Exhibit 4.

21 MR. BILES: Yeah, that's what I thought. I
22 had it wrong.

23 BY MR. BILES:

24 Q. All right. Mr. Wilson, I'm showing you again
25 which is Exhibit 4, which is the four text messages at issue

1 with Bates label Wilson ending in 06. Do you see that?

2 A. Yes, sir.

3 Q. When the text at the top came in, did you even
4 read it?

5 A. I don't recall if I read the first one or if I
6 noticed after there was several or more than one.

7 Q. Did you read the second text at the time?

8 A. I've read -- I've read all the texts.

9 Q. I understand that. When that text came in, did
10 you read it?

11 A. I don't recall if I did directly at that time or
12 not.

13 Q. Did you read the third text, and we're numbering
14 them from top to bottom, the third text, did you read that
15 when it came in?

16 A. I don't recall.

17 Q. The fourth text, the bottom text, did you read
18 that when it came in?

19 A. I don't recall. I just constantly have an
20 inundation of similar messages, so hard to remember if I did
21 at the exact time.

22 Q. And you didn't respond to any of those, right?

23 A. No, sir.

24 Q. So to the best of your recollection the first time
25 you dealt with these texts, you took an image of it and sent

1 it to your lawyers; is that right?

2 MR. PELUSO: Objection to the form.

3 A. I don't recall.

4 BY MR. BILES:

5 Q. Before sending this to lawyers, how much of your
6 life did this take up?

7 MR. PELUSO: Objection to the form again.

8 BY MR. BILES:

9 Q. None, right? You didn't even -- you don't even
10 remember reading them?

11 A. I don't remember the time that I read them, but I
12 do remember reading them, yes.

13 Q. Sure. You know that you read them when you took
14 an image of it and sent it to your lawyers; right?

15 MR. PELUSO: Objection to the form.

16 A. At the very latest date. I assume I had read them
17 earlier, too.

18 BY MR. BILES:

19 Q. How, if at all, do you claim receipt of those four
20 texts hindered you?

21 MR. PELUSO: Objection. Calls for a legal
22 conclusion.

23 A. I didn't even understand your question.

24 BY MR. BILES:

25 Q. Do you contend that you suffered an injury because

1 you received those four texts?

2 A. Absolutely. This added to my harassment that I
3 deal with every day, so, yeah, it definitely did.

4 Q. Well, if you're receiving ten to 60 a day, it's
5 not that much a big of a deal to receive one more, right?

6 MR. PELUSO: Object to form.

7 A. Every one -- honestly every one is a huge
8 harassment to me. And, you know, it's all these together
9 that cause a huge problem to me. And this is definitely,
10 you, it's not helping the issue whatsoever.

11 BY MR. BILES:

12 Q. How did -- just tell me, how did the very first
13 text skip all the others? How did that first text cause you
14 to be harassed, if at all?

15 A. It's -- I mean, it's been a matter of time. I
16 don't understand, I don't remember the exact frustration
17 that I had in the moment that I had read those, but I
18 don't -- I don't like any of these texts.

19 Q. That's not true, sir. But we'll get to that. But
20 you love these?

21 MR. PELUSO: Objection.

22 BY MR. BILES:

23 Q. You said so on line, right, sir? You've said you
24 love this.

25 MR. PELUSO: Objection, harassment, form,

1 relevance.

2 A. I don't -- I don't believe that's accurate at all.

3 BY MR. BILES:

4 Q. This is how you make money right, sir?

5 MR. PELUSO: Objection. Same objections,
6 plus asked and answered. We've already extensively gone
7 over them.

8 BY MR. BILES:

9 Q. Sir, you want these text messages -- sir, you want
10 these text messages, don't you?

11 MR. PELUSO: Object to form. Objection.
12 Harassment.

13 BY MR. BILES:

14 Q. You can answer.

15 A. We've -- we've been over this. I absolutely do
16 not want these, as I stated earlier on the record under
17 oath.

18 Q. How did receiving the first text -- well, do you,
19 let's make sure I understand everything you're saying.
20 You're claiming that you're injured because this harassed
21 you, is that correct?

22 A. It's a huge -- it's a huge burden to me, yes.

23 Q. Anything else?

24 A. No.

25 Q. Okay. How is it a huge burden when you received

1 the first text that you didn't read or that you don't recall
2 reading until after you sent it to your lawyers?

3 A. Oh, this is an ongoing burden that these text
4 messages has led me to. You know, I had to go buy a
5 computer so that I could do this, I had to sit here and do
6 all this, I had to go over all these documents.

7 I'd rather just have not gotten the messages
8 in the first place and never dealt with this, honestly. I
9 don't need the money from it, but I'm going to hold these
10 people accountable if I'm being harassed, because I
11 guarantee I'm not the only person.

12 And that's my main goal here is to stop these
13 and create a situation where these people can respect
14 consumers and not harass them as a class, as for everybody.
15 Not for myself only.

16 Q. You've never had a class certified, though, have
17 you, sir?

18 A. Excuse me?

19 Q. You've never had a class certified, have you?

20 A. I'm not sure what that means.

21 Q. How many cases have you settled?

22 A. Upwards of 20. I don't know. I'm not certain
23 exactly.

24 Q. Did anybody besides your -- you or your attorneys
25 receive anything from those settlements?

1 A. I assume so, yeah. I think so.

2 Q. On what basis do you assume so, sir?

3 A. Well, I know there's at least one incidence where
4 I've been a co-plaintiff and I believe the case was settled,
5 so --

6 Q. Okay. Fair enough. Did anybody besides you, a
7 named co-plaintiff, your attorney and any named
8 co-plaintiffs receive any money?

9 A. I can't -- I can't speculate on how funds are
10 disbursed, you know, but, yeah, I don't -- I don't know all
11 the -- that's all -- my attorneys do all of that stuff,
12 so --

13 Q. Did you ever get a class any relief whatsoever?

14 A. I don't understand the question.

15 Q. Sir, you've filed 70 potential class actions,
16 right?

17 A. Somewhere around there.

18 Q. And you understand as a result there's a
19 difference between you receiving money, and the class
20 receiving money, correct?

21 A. I believe the same standards of compensation are
22 for everybody. I don't -- I don't necessarily understand
23 how that's distributed. And I -- I don't actually
24 understand the -- how the difference, how the class -- I --
25 I don't understand all the little -- the verbiage as far as

1 how it goes.

2 Q. Okay. Okay. Do you know whether you ever got a
3 class certified?

4 A. I don't believe that it's moved to a class
5 certification on this case as of yet. But I believe.

6 Q. How about the other cases?

7 A. I don't -- I don't recall exactly, no.

8 Q. You do, you recall that you have not had a class
9 certified, don't you?

10 A. I don't know what the class certified, I don't
11 know what that means.

12 Q. Sir, I think you'd remember if you got a class
13 certified, don't you think so?

14 A. I don't -- I don't know -- I don't know what class
15 certified, actually the --

16 Q. So you brought 70 class actions, you don't know
17 what a class, getting a class certified is?

18 A. I've never been told that term directly like that,
19 class certified, no.

20 Q. Okay. Now, I understand that what you say is
21 receiving all these texts from all these lenders in
22 conglomeration, you say that's a burden, a huge burden.

23 But that's not my question. My question is
24 how, if at all, do you claim that receiving the four texts
25 that are currently up on the screen burdened you, or

1 otherwise harmed you in any way?

2 A. Every time I get a text it's -- it just irritates
3 me. It's irritating, it's like a little gnat just bothering
4 me. So every single time that I get one of these texts
5 that's not meant for me, it upsets me, and I don't enjoy it
6 and that's why we're here.

7 Q. Well, we're here because you want money, right,
8 sir?

9 MR. PELUSO: Objection to the form.
10 Objection, harassment.

11 A. I'd be -- oh, go ahead.

12 BY MR. BILES:

13 Q. Go ahead.

14 A. I'm -- I'm content without any money just as long
15 as this stuff stops. I mean, I'd -- I don't -- you know, I
16 think I should be compensated for what's been done so far,
17 and I think the biggest thing to me is making sure that if
18 anybody else is in this situation that they're compensated
19 even over myself -- that's the least of my worries is my own
20 personal compensation.

21 Q. Yet you care so much that you can't tell me
22 whether you ever got a class certified, right?

23 MR. PELUSO: Objection, asked and answered.

24 A. I just don't know what that means. So it's not me
25 avoiding anything, I just don't understand what that all

1 pertains to.

2 MR. BILES: Okay. Julia, can we go back to
3 the complaint? Can we go to the prayer, Page 9?

4 BY MR. BILES:

5 Q. All right. Mr. Wilson, do you see Paragraph B
6 there?

7 A. Yes.

8 Q. So you're asking for, An award of statutory
9 damages in the amount of \$500 for each violation, whichever
10 is -- which is greater -- what -- oh, whichever is greater
11 all to be paid into a common fund for the benefit of the
12 plaintiff and the class members, correct?

13 A. Yes, sir.

14 Q. All right. So for you personally, how much money
15 is that?

16 A. That would be \$2,000 if -- as long as they weren't
17 found to be intentional.

18 Q. Well, you haven't pleaded intentional, right?

19 A. What's that?

20 Q. You haven't requested the \$1,500 version, correct?

21 MR. PELUSO: Objection to the extent it calls
22 for a legal conclusion.

23 A. Yeah, I believe we're waiting on a legal
24 conclusion before.

25

1 BY MR. BILES:

2 Q. Do you know why you haven't pleaded for \$1,500 per
3 violation?

4 A. I believe that's, you know, I give that to my
5 attorneys to kind of find out what standards that -- yeah.

6 Q. Okay. So -- and to be frank, you also asked for
7 attorney's fees if we went down -- Julia, scroll down. He's
8 asking for attorney's fees, too.

9 And you want attorney's fees, correct?

10 A. I believe that's how it's written out in the
11 statute.

12 Q. So on your best day you personally would get,
13 according to you, \$2000 plus attorney's fees, correct?

14 A. Uh --

15 MR. PELUSO: Objection. That
16 mischaracterizes the testimony. Also calls for a legal
17 conclusion.

18 A. Yeah, I don't understand if these have only been
19 found to be nonintentional or if they -- more information
20 is, could possibly change that, so I'm not certain.

21 BY MR. BILES:

22 Q. I'll help you out. You haven't pleaded
23 intentional because then you could never get a class, and so
24 you're not asking for \$1,500 because then you're -- your
25 lawyers have made -- made a decision about this that you've

1 agreed to. So how much is it that you want from my client
2 to have this case go away?

3 A. I guess according to this, probably 2,000 and
4 attorney fees, I'm assuming, at least.

5 Q. Would you settle on that?

6 A. I'm not certain I'd have to talk with my counsel.

7 Q. Okay. That's fair enough.

8 MR. BILES: Julia, let's start pulling the
9 Facebook ones. Let's -- I'll tell you which one in a
10 second, Julia.

11 MS. COONS: Okay.

12 BY MR. BILES:

13 Q. All right. Let's go with tab 10.

14 Mr. Wilson, I think you covered this already,
15 but Chet Tank Wilson is one of your Facebook pages; right?

16 A. Mm-hmm.

17 Q. Did you make this post?

18 A. I did.

19 Q. Okay.

20 A. Yes. Shows my frustration in getting all these
21 calls.

22 Q. You got no calls from Reprise, though, right?

23 A. I'm not certain at this point. That was quite
24 some time ago.

25 Q. All right. So, and so, but you were saying you're

1 getting 30 to 70 telemarketer calls a day, is that correct?

2 A. I don't recall how accurate that is, but that
3 seems to be the case.

4 Q. You wouldn't post something that was inaccurate,
5 would you?

6 A. No, but it's five years ago, so hard to remember
7 details.

8 Q. How do you know this was five years ago?

9 A. Because it says at the bottom. Five years ago.
10 The screenshot or whatever it is.

11 Q. Oh, I see. Okay. Thank you.

12 MR. BILES: Julia, let's go with tab 9.

13 MS. COONS: Are we marking this one?

14 MR. BILES: Oh, I'm sorry, yeah. Let's mark
15 this as Exhibit -- I think we're on 7 now.

16 MS. COONS: Yes, sir. Okay. And you said 9?

17 MR. BILES: 9.

18 (Deposition Exhibit No. 7 was
19 marked for identification.)

20 (Deposition Exhibit No. 8 was
21 marked for identification.)

22 BY MR. BILES:

23 Q. All right. So now we're at Exhibit 8.

24 Mr. Wilson, this is posted by you, is that
25 correct?

1 A. Yes.

2 Q. Well, top one is posted by you and then there's
3 other people communicating, and then we go down a little bit
4 later and we get you responding to Liz Anderson, is that
5 correct?

6 A. Yes, sir.

7 Q. So this post you originally posted on December --
8 well, 2022, right?

9 A. Yes, sir.

10 Q. And at that time you were receiving, what, 30 to
11 70 solicitations a day?

12 A. I mean, I'm sure there's a variance, but, you
13 know, it's random, but, yes, somewhere in that vicinity.

14 Q. Okay. And then you tell Liz Anderson, "I
15 literally got to say all the 9's. Definitely once in a
16 lifetime. The universe loves me."

17 That's what you told her, right?

18 A. Yes. That's what I said.

19 Q. Okay.

20 A. I do think it's important you read the rest of
21 that comment, though, because it's -- I'm an optimist, so
22 I'm going to turn anything negative hopefully into something
23 positive.

24 Q. Move to strike, nonresponsive.

25 MR. BILES: Let's go to tab 6, Julia, so this

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1 will be the next exhibit, 8, I think.

2 (Deposition Exhibit No. 9 was
3 marked for identification.)

4 BY MR. BILES:

5 Q. All right. So Mr. Wilson, do you see, first of
6 all, you see where it says Chet Tank Wilson?

7 A. Yes, sir.

8 Q. And then you're responding to a Celeste Gable, is
9 that correct?

10 A. Yes, sir.

11 Q. And did you in fact make this post?

12 A. Yes.

13 Q. Did you refer her to one of your attorneys?

14 A. I don't believe she ever followed through with
15 anything, or we spoke anymore other than this post.

16 Q. And in this message you then -- you go on to say,
17 "What I did is just gave her tech guy my iCloud and they
18 stay on top of it. They are going back five years, the
19 biggest thing is keeping all the voicemails." Did I read
20 that correctly?

21 A. Yes, sir.

22 Q. And do you know when you posted this?

23 A. It says one year, but I'm not certain how long
24 it's been. Yeah, probably, that's probably accurate because
25 that's right about when I started learning about how to do

1 these cases, so, yeah.

2 So I didn't have the exact accurate details
3 to give her, it was just kind of -- obviously I was in the
4 introductory stages of learning this process.

5 Q. So you gave the tech guys at one of your law firms
6 access to your iCloud so they could stay on top of the text
7 messages you were receiving, is that right?

8 A. I don't believe -- it's not necessarily stay on
9 top of it, but to -- I had five years of all this stuff
10 gathered, and it was nearly impossible for me to go through
11 all of it and get all the details and stuff without some
12 kind of technical, somebody to help me go through it all.

13 Q. Okay. So you were -- you wanted to go back and
14 find every lawsuit you could bring under TCPA, right?

15 A. Yeah, you know, after years of being harassed, I
16 definitely wanted compensation for all that. I've spent so
17 much of my personal time trying to resolve this situation,
18 prior to them even acknowledging there was any kind of claim
19 or TCPA action, you know.

20 And I, as in the last document you showed me,
21 I said I'm going to keep this number and that's prior to me
22 ever knowing there was money involved in it, so it just goes
23 to show, and documents and supports everything I'm saying
24 here, so, yeah.

25 Q. So I mean you've got to have help going back

1 through all your text messages because you didn't really pay
2 that much attention to all of them, so now you got to go
3 back and find the ones that you want to sue over, right?

4 MR. PELUSO: Object to the form.

5 A. I don't think that's accurate whatsoever. I
6 believe that when you deal with such a volume of harassment,
7 it's -- it's hard to decipher which is what.

8 So you have to, you know, you have to
9 organize that to where you can acknowledge who's all at
10 fault for all these period of years that I have been
11 harassed. Before I knew there was any kind of compensation.

12 BY MR. BILES:

13 Q. And when you have a large volume of text messages
14 coming in, you don't really read every one of them, right?

15 MR. PELUSO: Object to the form, leading.

16 A. I go through them all.

17 MR. BILES: Go ahead, sir. You may answer.

18 A. I usually go through the majority of my texts and
19 calls, yes, I do.

20 BY MR. BILES:

21 Q. Every single text that comes in, as it comes in
22 you read it?

23 A. Well, it pops up on my screen usually when I'm
24 trying to do something else, and I get the -- I get the text
25 message and I read it and then, you know, and then sometimes

1 I get multiple and then I'm like, Wow, okay. This person is
2 really harassing me, so let me send this, so --

3 Q. So you're claiming that unbelievably, unlike the
4 rest of us, you read the text messages that come in as they
5 come in, every single one of them?

6 A. I did not say that.

7 Q. Even though you can tell -- even though you can
8 tell the second you see it that it's not something you want
9 to deal with.

10 MR. PELUSO: Objection to the form.

11 A. Well, when it -- when it pops up in a notification
12 I'm forced to read it right there, usually, and so yes, I
13 do, the majority of them while I'm awake anyways, I -- I --
14 I read them.

15 BY MR. BILES:

16 Q. Why?

17 A. To see what they're about.

18 Q. Why?

19 A. Because I have to weed through all this stuff to
20 find out what has to do with me and what could be connected
21 to something I'm doing, or if I have a bill or whatever
22 because I do have a lot of different things attached to my
23 private phone number. So if I'm getting something, I'm
24 going to make sure it's not something important that I have
25 to -- that I'm going to overlook.

1 Q. How long would that take you? Tenth of a second?

2 A. I mean it doesn't matter. When they all add up,
3 it's a waste of my life.

4 Q. I didn't ask you that question. I asked you how
5 long did it take per text?

6 A. Every text is different, sometimes there's links,
7 so, you know, that's not -- that's not -- that's not
8 something I can answer accurately.

9 MR. BILES: Julia, let's go to tab 5.

10 MS. COONS: Okay. We're marking this one as
11 Exhibit 9, correct?

12 MR. BILES: Yes.

13 MS. COONS: Okay.

14 MR. BILES: Better mark this one that's
15 coming up as the next exhibit.

16 MS. COONS: Okay. Tab five.

17 (Deposition Exhibit No. 10 was
18 marked for identification.)

19 BY MR. BILES:

20 Q. Sir, this is a post you made on your Chet Tank
21 Wilson Facebook account on -- I need my glasses -- on
22 December 10th, 2024, correct?

23 A. Yes, sir.

24 Q. And on that day you said you had "36 class action
25 lawsuits so far, and this is my first offer." Correct?

1 A. Yes, sir.

2 Q. How much was the offer?

3 A. I don't remember.

4 Q. Did you settle it?

5 A. I don't recall.

6 Q. What case was it?

7 A. I don't recall.

8 Q. You don't remember the very first time you got a
9 settlement offer, you can't tell me what case it was in?

10 A. I don't know.

11 Q. I mean, you're a professional. You have 70 of
12 these. You don't remember which one?

13 A. That's why I don't.

14 MR. PELUSO: Object to the form.

15 A. That's why I don't remember, because there's a lot
16 of them.

17 BY MR. BILES:

18 Q. Too many to keep track of, right, sir?

19 A. Accurately, yes, without looking at documents.

20 Q. Because as you said right there, "I sign several
21 new claims each week so looks like my phone number is gonna
22 be another line of steady income for me," exclamation point.
23 Correct, sir?

24 A. That's what I wrote.

25 Q. So these lawsuits including the lawsuit against

1 Reprise under the TCPA are a line of steady income for you,
2 correct, sir?

3 A. Yes, that's what I wrote.

4 Q. And it' true?

5 A. Yes, that's true because after all this harassment
6 it's like a light at the end of the tunnel, I was excited.
7 Yeah, I was excited that I'm finally going to be compensated
8 for all this time that I've wasted in my life dealing with
9 people that I don't even know.

10 Q. And you kind of enjoy these lawsuits, right?

11 A. I don't --

12 MR. PELUSO: Objection to the form.

13 A. I don't enjoy any part of this, to tell you the
14 truth.

15 BY MR. BILES:

16 Q. You're out there posting telling other people how
17 to do it, right?

18 A. To help other people. Just why I'm -- why I'm
19 trying to bring these class actions. Exactly.

20 Q. Um-hmm. Do you know how -- I'm going to ask you
21 this again: Do you know how much you've received in
22 settlement under TCPA?

23 A. I thought we went over this.

24 Q. Do you know if your lawyers in other cases have
25 settled for six figures?

1 A. On larger cases I believe that wouldn't be that
2 far off.

3 Q. So how much did you get?

4 A. Without looking at documents, I can't --

5 Q. What documents would we need to see in order for
6 us to determine how steady of a line of income this is for
7 you, sir?

8 A. Will you repeat that one more time?

9 Q. What documents would I need to review in order to
10 determine how steady of a line of income TCPA lawsuits are
11 for you?

12 A. It would have to be something that you'd received
13 from my attorneys, or, you know, I mean, I sign every
14 document, so I don't know.

15 Q. So I asked for every document in every lawsuit,
16 right, you saw that in the doc requests?

17 A. Yes, I believe so.

18 Q. And you know that you said that that was overly
19 burdensome and too hard for you to do, right?

20 MR. PELUSO: Objection. Calls for a legal
21 conclusion and these were legal objections.

22 A. This is all -- this is all things that I would
23 refer to my attorneys to produce. I'm not very tech savvy.

24 BY MR. BILES:

25 Q. You don't have to be, but in order to say it's

1 harass -- it's too much for you to do you'd have to know
2 that it's too much for you to do. How hard is it for you to
3 produce the files that your lawyers have, sir?

4 A. Accurately without missing anything, I wouldn't
5 feel comfortable that I'm good enough at doing computer work
6 and stuff.

7 Q. Wouldn't be hard for them to produce the
8 settlement agreements, though. You'd agree with that,
9 right?

10 A. I'm not certain. That's a question for them.

11 Q. That's a question for you, then, you could produce
12 them, is that right?

13 A. So --

14 MR. PELUSO: Objection to form.

15 A. I try not to add any more burden to this than I
16 have to. That's why I have attorneys.

17 BY MR. BILES:

18 Q. Yeah, so you get to sue people and add burden to
19 them, but you won't produce basic documents, sir. Is that
20 your position?

21 MR. PELUSO: Objection to form. Harassing.

22 A. It's -- I don't know how that's in my hands.
23 That's why I have attorneys.

24 MR. BILES: Oh. Julia, let's go to tab four
25 which we'll mark as the next exhibit number, which -- what

1 are we on, 11 now? It will be 11?

2 MS. COONS: It will be 11. Tab 4.

3 (Deposition Exhibit No. 11 was

4 marked for identification.)

5 BY MR. BILES:

6 Q. Sir, do you recognize -- can you just tell us what

7 this is?

8 A. This is my Facebook account.

9 Q. And a post that's down there under Chet Tank
10 Wilson, you posted that, right?

11 A. Yes, I did.

12 Q. So in there you claim you got -- started getting
13 blown up years ago with robot calls and prerecorded
14 nonsense, right?

15 A. Will you repeat that? I was read -- I was trying
16 to read it.

17 Q. It says, "I've been getting blown up for years
18 with robot calls and prerecorded nonsense." Did I read that
19 portion of that sentence correctly?

20 A. Yes.

21 Q. And when did you make that post?

22 A. I'm not certain. There should be a date on it,
23 but it doesn't, it was just -- I don't know. Within the
24 last year.

25 Q. How do you know it's within the last year?

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1 A. Because I just started the TCPA actions, I just
2 got knowledge of the TCPA actions a year ago when I
3 contacted the law firm to help me decipher all this.

4 Q. So you contacted --

5 A. So has to be within the year.

6 Q. Okay. So in a year you filed 70 lawsuits?

7 A. Roughly.

8 Q. And do you see there you just -- it says, "I just
9 signed two more class actions this morning and I have been
10 signing 1 - 3 per day since I started a month ago."

11 A. Yes, sir. Lots of work to be done.

12 Q. And you've mentioned there at that point you had
13 brought 30 suits so far, is that correct?

14 A. That looks accurate. I'm sure I wasn't
15 exaggerating. I think this outlines my stance from the
16 get-go is that, you know, I was finally excited that this
17 burden is actually bringing me some compensation, because
18 I'd been frustrated for years.

19 It's absolutely, yeah, it's insane for what
20 I've had to go through to get to this point.

21 Q. Just to be clear, for years you were being,
22 receiving 30 to 70 text messages a day you thought were
23 violations of the TCPA, right?

24 A. Yes, sir.

25 Q. Okay. And not one time did you respond to any of

1 those with "Stop," correct?

2 A. Yeah, I did with multiple, and I told you earlier
3 in the previous comments that I believe I found it's click
4 bait. And the majority of the time when you do respond in
5 any form whether its "Stop" or what have you, it just
6 entices them to realize there's somebody real on the other
7 end and it makes it worse.

8 Q. When is the last time you responded "Stop"?

9 A. I'd have to look back through my texts, but at
10 least, you know, it's -- I just had -- I just had some the
11 other day that I found that I pushed "Stop" and it was,
12 there were multiple messages afterwards.

13 Then I said "Stop" again and there's more
14 multiple messages, and so, yeah, I do have documents but it
15 would take me some time to track them down.

16 Q. So you did -- okay.

17 A. I have proof of when I typed "Stop," it's not
18 working. So at least, you know, at least one occasion that
19 is in my memory. So --

20 Q. You didn't give Reprise that chance, though,
21 right?

22 A. After over and over and not working, it -- yeah,
23 there's -- I mean it just seems like it could make that
24 situation worse, so it's just more time I'd have to invest
25 in something that would never come to fruition.

1 Q. But just to be clear, you did not send "Stop" in
2 response to Reprise text messages, right?

3 A. I did not because I thought it would be
4 detrimental.

5 Q. Earlier you said you had to invest in doing these
6 lawsuits and you bought a computer, is that right?

7 A. I'd invested, yeah, I had to buy a computer and
8 then -- I mean, my time is far more valuable than that.

9 Q. So why did you buy a computer to do these
10 lawsuits?

11 A. Because it was my understanding I needed an actual
12 PC rather than my iPad that I already had, and I believe it
13 was at the request of the defendant, so that's -- that's
14 why. Otherwise I wouldn't spend a penny on this.

15 Q. What were you using -- what are you using the
16 computer to do in regard to the lawsuits?

17 A. I believe it was the connection with the Zoom and
18 having a steady camera, and that's my understanding. I
19 don't -- I don't -- I'm absolutely the least technical savvy
20 person you'll ever meet. So I just, yeah, I was told that
21 that's what's needed, so I went and got a computer. And
22 here I am.

23 Q. What else have you done to invest in these
24 lawsuits?

25 A. Mostly my time, you know, it takes a lot of time

1 and, yeah, you know, I've -- I've learned a lot over the
2 last year.

3 Q. How much time do you -- how much time do you
4 invest in this on a weekly basis?

5 A. I don't know. Maybe five to ten hours, depending
6 on how -- how much harassment I get a week. And that's just
7 on -- actually more than that because -- I don't know, I'd
8 say potentially upwards of 20 hours a week.

9 Q. And what are you doing for those 20 hours you
10 invest into litigation?

11 A. Gathering information, sending documents that I
12 think would pertain to TCPA actions, forwarding voicemails,
13 transcripts of voicemails, you know, going through
14 documents, preparing for depositions.

15 Just paperwork and paperwork and paperwork,
16 all, you know, looking in my emails all the time.
17 There's -- it's a lot to it. It's, you know, it's a -- it's
18 a job. A job I never -- I never asked for, so --

19 Q. Well, no one is making you file these lawsuits,
20 right?

21 A. Nobody's making me.

22 Q. And I assume the law firm didn't ask you to file
23 them, you went to the law firm, right?

24 A. Yes, sir.

25 Q. Are you sure you found the law firm you're using,

1 not Mr. Peluso, the law firm that referred you to Mr.
2 Mr. Peluso by Googling them?

3 A. Yes. I believe in a previous discovery we even
4 produced that. My search -- not with this case in
5 particular, but I believe the search, there is search
6 history of me looking for representation.

7 Q. They're not the easiest firm to find on the
8 internet, are they?

9 A. I believe I clicked one of the first options so I
10 had never heard of them prior, that's for sure.

11 MR. BILES: I'm pretty much done, so we'll
12 take a five-minute break and then I'll make sure we're done?

13 MR. PELUSO: Okay.

14 (Recess taken.)

15 BY MR. BILES:

16 Q. Mr. Wilson, I just want to understand one issue.
17 You say in order to make ends meet you're doing that by
18 selling things. What are you selling?

19 A. I have multiple pieces of equipment. I collect
20 decommissioned military equipment, semi-trucks, transport
21 buses, Unimogs, 6 by 6 cranes, you know, many different
22 military things. And, you know, cars, trucks, what have
23 you.

24 And I do a lot of bartering and trading and
25 it works really well. I'm really good at it.

1 Q. In order to barter or trade, you have to already
2 own stuff which requires money. I'm still trying to figure
3 out where the money is coming from for these lawsuits. So
4 you haven't had an income in forever, right?

5 A. About five years.

6 Q. Okay.

7 A. I made really good money moving people with my
8 moving company that I owned.

9 Q. How much did you make?

10 A. I'm not certain exactly, but --

11 Q. Well, you're the one who said really good money,
12 so what does really good money mean to you?

13 A. Well, a lot of the things is barter movers, so to
14 put into clarification, a lot of these elderly people that
15 are moving into retirement facilities, they'd give me
16 basically all their assets that wouldn't fit in their place,
17 in trade for doing the move.

18 So then I'd, in return I'd put them online
19 or, you know, sell whatever kind of stuff that I get out of
20 it, furniture, what have you. And, you know, so I had an
21 accumulation of many, many things that I acquired while
22 doing this moving, and, you know.

23 So I'd say a lot of my assets come from like
24 kind of a residual based on the work I put in years ago.

25 So, you know.

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1 Q. Okay. Well, how much were those items of the
2 estates -- that's not right, they're still alive, but of the
3 materials, equipment, stuff they gave you, how much was it
4 worth at the time because you'd have to know that in order
5 to fill out your tax returns?

6 A. I had a CPA so he handled all that stuff. I mean
7 it would be something I'd have to like go back into
8 documents about, so, yeah. I always have different little,
9 facets of, you know, things trickling in because of my
10 network and, you know, I just -- it's kind of neat.

11 MR. BILES: Okay. I'll pass the witness.

12 MR. PELUSO: I don't have anything.

13 THE REPORTER: Are you going to order,
14 Mr. Biles?

15 MR. BILES: Yes, I am.

16 THE REPORTER: Did you want to order, Mr.
17 Peluso?

18 MR. PELUSO: Yes, please.

19 THE REPORTER: Do you want him to read and
20 sign?

21 MR. PELUSO: Yeah, we'll read.

22 THE REPORTER: And you'll handle that?

23 MR. PELUSO: Yes.

24 (Whereupon the deposition concluded

25 at 11:27 AM)

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E-R-R-A-T-A

Deponent: CHET MICHAEL WILSON
Case: Wilson v. Skopos Financial
Date Taken: December 12, 2025

Page / Line Correction

I declare under penalty of perjury that the foregoing 84 pages are true and correct except for such corrections as I may have noted above.

Executed this _____ day of _____, 2025.

CHET MICHAEL WILSON

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C-E-R-T-I-F-I-C-A-T-E

I, CHERYL L. HAASE, a NCRA Registered Professional Reporter and Certified Court Reporter for the State of Washington, do hereby certify that the above and named witness, CHET MICHAEL WILSON, was first duly affirmed to testify the truth; that said witness did thereupon testify as is set forth; that the answers of said witness to the oral interrogatories propounded by counsel were taken by me in stenotype and thereafter reduced to typewriting under my personal direction and supervision.

I further certify that the facts stated in the caption hereto are true; and that all of the proceedings in the course of the hearing of said deposition are correctly and accurately set forth herein.

I further certify that I am not counsel, attorney or relative of either party, nor financially or otherwise interested in the event of this suit.

IN WITNESS WHEREOF, I have hereunto set my hand as such Registered Professional Reporter on this the 16th day of December, 2025, at Lebanon, Oregon.

Cheryl L Haase

Cheryl L. Haase, RPR, CCR
NCRA RPR No. 12443/WA CCR No. 3503

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EXHIBIT C



All comments ▾



Rhett Wells
Right on pard

1y Like Reply



Celeste Gable
How do I report all these robo callers? I'm on the DNCR but I still get them!! And I don't want to have to answer each call and document every LITTLE detail just to make it a report 😞😞!!!

1y Like Reply



Chet Tank Wilson
Celeste Gable I can help you and maybe my atty would be into talking more cases then what I did is I just gave her tech guy my iCloud and they stay on top of it. They are going back 5yrs. The biggest thing is keeping all the voicemails.

1y Like Reply Edited



Brian Walker
Chet Tank Wilson can you send me that info as well man

1y Like Reply



Chet Tank Wilson
Brian Walker will do I'll ask my atty about it

1y Like Reply



Brian Walker
Chet Tank Wilson ty bro

1y Like Reply



Lutefisk Kov ✓
Chet Tank Wilson Me to

51w Like Reply



Write a comment...

EXHIBIT D



All comments ▾



Rhett Wells
Right on pard

1y Like Reply



Celeste Gable
How do I report all these robo callers? I'm on the DNCR but I still get them!! And I don't want to have to answer each call and document every LITTLE detail just to make it a report 😞😞!!!

1y Like Reply



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1y Like Reply Edited



Brian Walker
Chet Tank Wilson can you send me that info as well man

1y Like Reply



Chet Tank Wilson
Brian Walker will do I'll ask my atty about it

1y Like Reply



Brian Walker
Chet Tank Wilson ty bro

1y Like Reply



Lutefisk Kov ✓
Chet Tank Wilson Me to

51w Like Reply



Write a comment...

EXHIBIT E

Chet Tank Wilson's Post



Chet Tank Wilson

May 6 at 11:06 AM · 🌐



Got some holes need filled boys & I need to know who's with me on this one! 🇺🇸👊😎



Play



1:12 / 1:53



101

37 comments 2 shares 3.2K views



Write a comment...



EXHIBIT F

Why this happened

The post may contain something that could encourage violence and lead to risk of physical harm, or a direct threat to public safety.



Chet Tank Wilson

Feb 15, 2026

Get em ALL!

You shared this on your profile

This goes against our Community Standards on violence and incitement.



See rule

What you need to know



How to prevent further restrictions



How we made this decision



bunkerplot · Follow



bunkerplot Kicked off of Faggbook again! That was a good run though! 😊

12w



Be the first to like this
February 17



Add a comment...

Post




Why do you want another review?

You misunderstood this post

What should we know about your post?

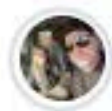
It's about an important issue

What we'll do

-  We'll update you within a few days.
-  Your case will be looked at again by our technology or a reviewer. We'll use the additional info you gave us to improve our systems.
-  We aim to respect your free expression while keeping the community safe.



bunkerplot · Follow



bunkerplot Kicked off of Faggbook again! That was a good run though! 😊

12w



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February 17



Add a comment...

Post



bunkerplot · Follow



bunkerplot Kicked off of Faggbook again! That was a good run though! 🙄

12w

Feb 16, 2026

You'll hear back from us soon

Thanks for requesting a review. We'll let you know when it's complete. If we find we made a mistake, we will change the original decision.

Most people hear back in less than 4 days, but it can take longer.



What you need to know



About this review



How reviews work



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February 17



Add a comment...

Post



Updates on this decision



You'll hear back from us soon

In review • Feb 16, 2026



Why this happened

The post may contain something that could encourage violence and lead to risk of physical harm, or a direct threat to public safety.



Chet Tank Wilson

Feb 15, 2026

Get em ALL!

You shared this on your profile

This goes against our Community Standards on violence and incitement.



See rule



What you need to know.....



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bunkerplot Kicked off of Faggbook again! That was a good run though! 🤔

12w



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February 17



Add a comment...

Post

What this means

Everything you manage, including all of your profiles, Pages and groups, is restricted.



You can't post or comment

Ends on Mar 18, 2026



You can't start or join calls

Ends on Mar 18, 2026



You can't use groups

Ends on Mar 18, 2026



Why this happened

We restricted your account as a safety measure because your activity may not follow our rules.



Violence and incitement

Post removed

Feb 16, 2026 · In review



Violence and incitement

Post removed

Nov 12, 2025



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bunkerplot Kicked off of Faggbook again! That was a good run though! 😊

12w











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February 17



Add a comment...

Post

-  **Violence and incitement**
Post removed
Feb 16, 2026 · In review
-  **Violence and incitement**
Post removed
Nov 12, 2025
-  **Hateful conduct**
Post removed
Oct 5, 2025
-  **Violence and incitement**
Comment removed
Sep 29, 2025
-  **Bullying and harassment**
Comment removed
Sep 29, 2025
-  **Bullying and harassment**
Comment removed
Sep 29, 2025
-  **Bullying and harassment**
Comment removed
Sep 29, 2025
-  **Violence and incitement**
Comment removed

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 bunkerplot Kicked off of Faggbook again! That was a good run though! 😊
12w









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February 17


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 **Violence and incitement**
Post removed
Sep 29, 2025


 **Hateful conduct**
Post removed
Sep 29, 2025

 **Hateful conduct**
Comment removed
Jul 28, 2025 · Review complete

 **Hateful conduct**
Post removed
May 17, 2025

 **Bullying and harassment**
Post removed
Apr 7, 2025

 **Bullying and harassment**
Post removed
Apr 3, 2025

 **Bullying and harassment**
Post removed
Apr 2, 2025

 **Hateful conduct**
Comment removed

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 **bunkerplot** Kicked off of Faggbook again! That was a good run though! 😊
12w

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EXHIBIT G

England

-  Southeastern England & Northwestern Europe 39% >
-  East Midlands 9% >
-  Devon & Somerset 4% >

Celtic & Gaelic

-  Central Scotland & Northern Ireland 18% >
-  North East Scotland 3% >
-  Connacht, Ireland 2% >
-  Donegal, Ireland 1% >

Western Europe

-  Southern Germanic Europe 9% >
-  Northwestern Germany 2% >


Nordic

-  Denmark 8% >

Central & Eastern Europe

-  North Central Europe 3% >

Italy

-  Central Italy 2% >



bunkerplot · Follow



bunkerplot Not a fkn trace of knuckle dagger in my bloodline and proud! 😎

10w



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February 27



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EXHIBIT H



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Original audio



bunkerplot This is surely gonna stir the pot, but I'm done accepting this reverse discrimination B.S. Pay your own way or get the fuck out of this country! Ain't nobody else's obligation to feed your lazy fkn ass!

28w



This reel has 20 comments from Facebook.



54 likes

October 30, 2025



Add a comment...

Post

EXHIBIT I



bunkerplot · Follow

Original audio



bunkerplot Raise leaders, not lil weak ass bitch queefs!

29w



sahaliendabrat 🙏🙏🙏🙏

28w Reply



This reel has 8 comments from Facebook.



60 likes

October 23, 2025



Add a comment...

Post



EXHIBIT J

Tank's B-Day Bash

*Filthy
Delicious*



21+ Only
Call or Text
Info Line for
Address



(541)999-9999



bunkerplot • Follow



bunkerplot Hit me up for details...
21w



4 likes
December 19, 2025

Add a comment...

Post

EXHIBIT K



Chet Tank Wilson

July 10, 2014 ·



Hey guys... scope this group I just made and add your friends... this is one of the most important things we could do to keep the gov't out of our pockets and out of our business...



Chet Tank Wilson ▸ **NW HOUR SHARE**

July 10, 2014 ·

This is a page that we can share our skills and trade work for others returned work instead of dealing with monetary exchange. This nearly doubles the value of each of our work. It circumvents taxation, and builds a strong community independent of our government which has come to the point of enslaving it's own people and stealing their money every chance they can get running each if us through the gauntlet of their corrupt bureaucracy... this page will take a minute to grow into a fully operational group so make sure to add anyone that is on the same page with us that would be willing to be proactive with this idea... **See less**

Like

Comment

Share