

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

BIG CAT RESCUE CORP., a )  
Florida not-for-profit )  
corporation, )  
 )  
Plaintiff, ) No. 5:13-fj-1-F  
 )  
vs. )  
 )  
BIG CAT RESCUE ENTERTAINMENT )  
GROUP, INC., an Oklahoma )  
corporation, G.W. EXOTIC )  
MEMORIAL ANIMAL FOUNDATION, )  
d/b/a BIG CAT RESCUE )  
ENTERTAINMENT GROUP, an )  
Oklahoma corporation; JOE )  
SCHREIBVOGEL, a/k/a JOE )  
EXOTIC, a/k/a AARRON ALEX, )  
a/k/a CODY RYAN, individually, )  
 )  
Defendants. )  
 )

DEPOSITION OF

VINCE JOHNSON

Taken in behalf of Plaintiff

\* \* \*

February 12, 2018

400 Columbia Street, Suite 140

Vancouver, WA 98660

Janette M. Schmitt, CSR, CCR, RPR

Court Reporter

MALD-PASS\_010075

Exhibit 13

Page 2

1 APPEARANCES:

2 For the Plaintiff:

3 MR. JUSTIN GIVENS

4 Phillips Murrah PC

5 Corporate Tower, 13th Floor

6 101 N. Robinson

7 Oklahoma City, OK 73102

8 405-235-4100

9 jrgivens@phillipsmurrah.com.

10

11 Also Present: Ms. Evelyn Jaimez

12

13

14

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Page 4

1 VANCOUVER, WASHINGTON; MONDAY, FEBRUARY 12, 2018

2 10:55 a.m.

3 \* \* \*

4 VINCE JOHNSON

5 called as a witness in behalf of the Plaintiff,

6 having first been sworn by the Reporter,

7 testifies as follows:

8 EXAMINATION

9 BY MR. GIVENS:

10 Q. Mr. Johnson, good morning.

11 A. Good morning.

12 Q. You and I had a chance to speak for a little

13 bit earlier today. You arrived here on time pursuant

14 to your deposition subpoena; correct?

15 A. Yeah. Give or take a minute.

16 Q. Sure. And we visited a little bit. And you

17 made me aware that you had gone to see the doctor or

18 been to the emergency room last week, on February 7th;

19 is that true?

20 A. Yeah.

21 Q. And you were having some issues at that

22 point?

23 A. I was having mini strokes.

24 Q. Okay. And you brought some records here.

25 Do you want to make those a part of the

Page 3

1

2 INDEX

3 Examination by: Page

4 MR. GIVENS 4

5

6 EXHIBITS

7 Exhibit Description Page

8 Number

9 1 Subpoena to Appear to Testify 6

10 and to Produce Documents,

11 Information, or Objects, or to

12 Permit Inspection of Premises

13 in a Civil Action, Exhibit "A"

14 2 E-Mail dated Dec 11, 2017 52

15 3 Payments to Danny Clinton 57

16 4 Payments to Danny Clinton and 71

17 Victor Sorisio

18 Witness 1 Paragraph on Transient 86

19 Ischemic Attack (TIA)

20

21

22

23

24

25

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1 record this morning? Or do you want to just tell me

2 about them?

3 A. I think portions of it I should -- should

4 be known, you know, because, like I was telling you

5 off the record, my mind's a bit in a fog.

6 Q. Okay. And we discussed that a little bit.

7 And am I correct in understanding that you're okay

8 going ahead and proceeding this morning?

9 A. Absolutely, yes.

10 Q. And we're just going to take it easy?

11 A. Correct.

12 Q. Okay. And if at any time, Mr. Johnson, you

13 begin to not feel well, or think you might be having

14 an episode, or a TIA, or anything like that, you're

15 going to tell me and the court reporter immediately;

16 correct?

17 A. Correct.

18 Q. And if that's the case, then we'll

19 immediately stop and you can go see your doctor and

20 go do what you need to do.

21 Is that fair?

22 A. Absolutely.

23 Q. So throughout this morning, and however

24 long it takes today, we'll take it easy, take a

25 break when you need a break. If you need coffee,

Page 6

1 fresh air, just let me know; all right?  
 2 A. All right. Thank you.  
 3 Q. I'm going to hand you what we'll mark as  
 4 Exhibit 1 to your deposition, Mr. Johnson.  
 5 MR. GIVENS: Are those exhibit sticker  
 6 handy?  
 7 (Deposition Exhibit Number 1 marked for  
 8 identification.)  
 9 Q. (By Mr. Givens) And we may have a few  
 10 exhibits here today. There will be very few. But  
 11 this one is just a copy of what you were served.  
 12 If you'll just take a quick look at that,  
 13 flip through the pages, and let me know when you've  
 14 read through it.  
 15 A. (Witness complies.)  
 16 Q. The very back two pages of this deposition  
 17 subpoena and subpoena duces tecum has an Exhibit A.  
 18 And it asks you -- it lists five paragraphs of  
 19 document descriptions --  
 20 A. Right.  
 21 Q. -- asking you to provide anything that you  
 22 would have in your possession or control responsive  
 23 to those categories.  
 24 Did you search your records to see if you  
 25 had any documents responsive?

Page 7

1 A. I don't have anything.  
 2 Q. Okay. So with respect to paragraphs one,  
 3 two, three, four, and five of Exhibit A to your  
 4 subpoena, you don't have any documents responsive;  
 5 correct?  
 6 A. Correct.  
 7 Q. Okay. And earlier, before the deposition  
 8 started, I gave you a check for your statutory  
 9 witness fee; is that correct?  
 10 A. Correct.  
 11 Q. And you have that?  
 12 A. Yeah.  
 13 Q. Mr. Johnson, I want to talk just a little  
 14 bit about -- very little bit about your background.  
 15 Pretty typical in depositions to get some sense of a  
 16 witness and their background.  
 17 Did you -- where did you -- where were you  
 18 born and raised, Mr. Johnson?  
 19 A. Portland -- Portland, Oregon.  
 20 Q. Out here in the Washington area,  
 21 Oregon-Washington area?  
 22 A. Yeah.  
 23 Q. And did you grow up in this general area?  
 24 A. Yeah.  
 25 Q. Do you have brothers and sisters?

Page 8

1 A. Yeah. They're in Arizona.  
 2 Q. Okay. Are you currently married?  
 3 A. No.  
 4 Q. Okay. Have you ever been married?  
 5 A. No.  
 6 Q. Do you have any children?  
 7 A. Yeah.  
 8 Q. Okay. --And do your children live out -- how  
 9 many children do you have?  
 10 A. Three.  
 11 Q. Okay.  
 12 A. One, he's a -- you know, I prefer not to  
 13 talk about personal stuff, you know.  
 14 Q. Well, I'm just trying to get a sense of  
 15 your background.  
 16 A. I appreciate that.  
 17 Q. Do you have -- other than the name Vince  
 18 Johnson, do you go by any other names?  
 19 A. No.  
 20 Q. Okay. When you were playing music, did you  
 21 have any stage names or aliases you used?  
 22 A. No.  
 23 Q. Now, when you received the subpoena that's  
 24 marked as Exhibit 1, Mr. Johnson, did you do  
 25 anything to prepare for the deposition today?

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1 A. No, not really. I mean --  
 2 Q. Okay.  
 3 A. -- there's nothing to do.  
 4 Q. After you received the subpoena, did you  
 5 call anybody?  
 6 A. No.  
 7 Q. Did -- at some point, did you call Heather  
 8 Hintz in my office?  
 9 A. Oh, yeah. I did call someone.  
 10 Q. Okay. And prior to actually receiving the  
 11 subpoena, did you get a call from anybody telling  
 12 you it was going to be coming?  
 13 A. No.  
 14 Q. Okay. Did Joe Maldonado, or Joe  
 15 Schreibvogel, call you about a notice of subpoena?  
 16 A. No.  
 17 Q. He didn't?  
 18 A. No. No. He mailed the actual -- what he  
 19 had.  
 20 Q. Okay. So he mailed the notice of subpoena  
 21 to you?  
 22 A. Correct. Right.  
 23 Q. And if we say, for today's purposes on the  
 24 record, Mr. Johnson -- if we say, Joe Exotic, or Joe  
 25 Schreibvogel, or Joe Maldonado, or Joe

Page 10

1 Maldonado-Passage, we all know who we're talking  
 2 about?  
 3 A. Yeah. He's a shyster. We can stick that  
 4 in there.  
 5 Q. We'll stick to the legal names for today's  
 6 purposes that he's had. But just so the record is  
 7 clear today, if I say, Joe, unless I designate  
 8 otherwise, or you designate otherwise, we'll  
 9 understand we're talking about Joe Schreibvogel, who  
 10 now goes as Joseph Maldonado-Passage; okay?  
 11 A. Sure.  
 12 Q. So you have not spoken with Joe about the  
 13 subpoena or about this deposition?  
 14 A. No.  
 15 Q. Have you talked to anybody, other than  
 16 Heather or my office, about the subpoena or your  
 17 deposition today?  
 18 A. No.  
 19 Q. On your -- let's discuss, just a little  
 20 bit, your educational background, Mr. Johnson.  
 21 A. I don't want to speak about personal stuff.  
 22 Q. Well, it's just superficial stuff; okay?  
 23 It's just background information; okay?  
 24 Did you graduate high school?  
 25 A. Yeah.

Page 11

1 Q. Okay. Did you go to college?  
 2 A. Yeah.  
 3 Q. Where did you go to college?  
 4 A. Portland State.  
 5 Q. Okay. Did you get a degree --  
 6 A. No.  
 7 Q. -- from Portland State?  
 8 A. No.  
 9 Q. What was your focus of study?  
 10 A. Philosophy. It really paid off.  
 11 Q. Did you study music at Portland State?  
 12 A. No.  
 13 Q. Okay. Have you had any formal music  
 14 training that you call formal?  
 15 A. Not really, no. Self-taught.  
 16 Q. You're like a lot of musicians and folks I  
 17 know in the music business that it seems that it's  
 18 not a lot of formal training, it just kind of comes  
 19 naturally?  
 20 A. Right. Right. And I do feel uncomfortable  
 21 talking about personal stuff.  
 22 Isn't this just about Joe?  
 23 Q. This is just background.  
 24 A. I realize that, but why?  
 25 Q. Well, there's a certain amount of

Page 12

1 information, background, that we always ask of  
 2 witnesses, Mr. Johnson. I'm not trying to make you  
 3 uncomfortable.  
 4 A. I think it's unnecessary, you know. I  
 5 don't...  
 6 Q. Mr. Johnson, over the last --  
 7 A. I don't mean to be difficult about that.  
 8 Q. No. I understand.  
 9 A. Right.  
 10 Q. I'm trying to be differential to get  
 11 through this today without any problems,  
 12 Mr. Johnson.  
 13 A. All right.  
 14 Q. But there's just some things I need to know  
 15 and try to understand; okay?  
 16 A. Okay.  
 17 Q. Okay. Are you currently employed? Do you  
 18 work?  
 19 A. No.  
 20 Q. Okay. Over the last ten years, let's just  
 21 say, have you worked mostly as a musician? Or have  
 22 you had different jobs?  
 23 A. Yes.  
 24 Q. Okay. And some of this is frankly just  
 25 because of my background. I'm interested in music

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1 and people who work with musicians and try to earn a  
 2 living at that.  
 3 So over the last ten years, am I correct in  
 4 understanding that's been your -- pretty much your  
 5 source of supporting yourself?  
 6 A. Correct.  
 7 Q. Okay. Over the last ten years, has there  
 8 been anybody -- any company that you've done work  
 9 for that gives you a W-2, for example?  
 10 A. Yeah. But I don't -- a couple have, but I  
 11 forgot who. Rumblefish, our licensing place.  
 12 There's been a couple, yeah.  
 13 Q. In the music business, what do you -- are  
 14 you a musician primarily, or a songwriter, or both?  
 15 A. Both. Mainly a songwriter.  
 16 Q. Okay. What instruments do you play?  
 17 A. Anything with strings.  
 18 Q. Yeah? Guitar? Banjo?  
 19 A. Correct. Right.  
 20 Q. The -- you've been in some bands over the  
 21 last several years; correct?  
 22 A. I own my own band.  
 23 Q. Is that The Clinton Johnson Band, and also  
 24 The Vince Johnson Band?  
 25 A. Correct. Right.

Page 14

1 Q. Over the last ten years, are those the two  
 2 bands you've played with the most?  
 3 A. Correct. Right.  
 4 Q. Do you do any studio work too?  
 5 A. Yeah. Yeah, pretty much strictly studio.  
 6 Q. Okay. Do you do any vocal work?  
 7 A. No. I sing a little harmony if I'm drunk  
 8 enough. But by and large, no.  
 9 Q. Okay. Fair enough.  
 10 Tell me about the songwriting. When did  
 11 you -- how did you kind of get into the songwriting  
 12 stuff?  
 13 A. Is this really necessary?  
 14 Q. I'm just trying to understand.  
 15 A. Hitler was a corporal. I've been writing  
 16 for a long time.  
 17 Q. Okay.  
 18 A. I like it.  
 19 Q. Have you ever had anything recorded by or  
 20 picked up by a major label or anything?  
 21 A. No.  
 22 Q. Okay. Anything for movies, or TV, or  
 23 anything?  
 24 A. Yeah, it's like 34 movies, and the TV show,  
 25 Justified, has got one of my songs.

Page 15

1 Q. Really?  
 2 A. In fact, Saturday, I was on a Lifetime  
 3 network, a movie called Broken Promise. It's got  
 4 one of my songs.  
 5 Q. Really?  
 6 A. It's usually low budget. It's not Brad  
 7 Pitt films. It's pretty low budget.  
 8 Q. Sure. Sure. Do you have -- do you have,  
 9 currently, any publishing deals?  
 10 A. I self-publish.  
 11 Q. Okay. That's the way to do it, isn't it?  
 12 A. Yeah. You need to get to a major artist,  
 13 you know.  
 14 Q. Okay. Sure.  
 15 A. Major house to get your work out. But,  
 16 yeah, it supposedly pays more.  
 17 Q. Sure. Are you still actively writing and  
 18 pursuing your --  
 19 A. Not since the frigging stroke, man, you  
 20 know. I mean, I've got bits and pieces. I haven't  
 21 finished anything.  
 22 Q. Are you talking about from the 7th, last  
 23 week?  
 24 A. No. From the major stroke in August 2016.  
 25 Q. Okay. I guess I didn't understand about

Page 16

1 that. I thought you were talking about your doctor  
 2 visit last week.  
 3 A. What about it?  
 4 Q. That -- I didn't realize that there was an  
 5 event in August of 2016.  
 6 A. That was the big one. I had brain surgery,  
 7 and they put a stent in, and I couldn't walk for  
 8 four months. I had to learn how to walk.  
 9 Q. Okay.  
 10 A. But this has (indicating) -- this is the  
 11 same symptoms I had leading up to the big -- you  
 12 know, the big boy in 2016.  
 13 Q. Okay.  
 14 A. You know what I'm saying?  
 15 Q. Sure. So when you do your -- in the past  
 16 when you've done your songs, do you handle all of  
 17 your copyright stuff yourself and do all that?  
 18 A. Yeah. I've been lazy about it. I copy  
 19 maybe 50 percent of my songs. 25 percent now  
 20 that...  
 21 Q. That you officially file on?  
 22 A. Correct. Right.  
 23 Q. But you, otherwise, either have those  
 24 recorded in writing, or you've recorded something in  
 25 the studio with them?

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1 A. Well, name a copyright infringement.  
 2 They're so rare, you know. If Toby Keith wants to  
 3 rip me off, God love him. I'll hire you to sue him,  
 4 you know.  
 5 Q. Fair enough. So over the last ten or 15  
 6 years, is it The Vince Johnson Band, and then The  
 7 Johnson Clinton Band that you were in with Danny  
 8 Clinton? Are those the two bands you've been in?  
 9 A. Right.  
 10 Q. Do you play live anymore, Vince?  
 11 A. No.  
 12 Q. When is the last time you played live?  
 13 A. 15, 20 years.  
 14 Q. Did you guys tour around quite a bit?  
 15 A. No, no. I met Danny about ten years ago,  
 16 in fact.  
 17 Q. Okay. Have you ever played live outside of  
 18 this --  
 19 A. No. No.  
 20 Q. Today, let me -- we're having kind of a  
 21 normal conversation, Mr. Johnson, but we need to  
 22 make sure we're not talking over each other --  
 23 A. I'm sorry.  
 24 Q. -- so the court reporters can make a clear  
 25 record; okay?

Page 18

1 A. Okay.

2 Q. And sometimes I'm bad about that because I

3 get conversational with you, and it's easy to talk

4 over each other.

5 A. No. That's my fault. I'm sorry.

6 Q. So I'll state that again so it's clear.

7 Have you ever toured outside of this

8 general Northwest area of the United States?

9 A. No.

10 Q. You've never had a record deal with a

11 label?

12 A. No. I've been offered a few, but, no, I

13 turned them down.

14 Q. In your recordings, Mr. Johnson, do you do

15 any of the sound and engineering --

16 A. No.

17 Q. -- or production work?

18 A. No. The moving the knob and stuff, it's

19 like NASA to me. It's the big picture, I guess.

20 Q. Right. And I guess that was kind of the

21 big question. The sound engineering is one side,

22 the guys running the big recording boards in the

23 studio.

24 But as far as the arrangements of the

25 songs, you do write the music and are involved in

Page 19

1 the arrangements?

2 A. Words and melody, correct, which is a song.

3 Q. Okay. Sure. Do you decide, for example,

4 what instruments are going to be used in the song

5 and where you want, you know, the B-3 organ versus

6 electric guitar riffs?

7 A. Yeah. It's a collaborative, but I have my

8 input, yes.

9 Q. When you say, Collaborative, do you mean

10 whoever you're working with at the time?

11 A. Yes.

12 Q. Have you gotten into or done any work in

13 the production of music videos?

14 A. My ex put some of my songs on YouTube, but,

15 you know, just simple -- just picture. And then

16 some gal in Germany, she was a fan, she, you know,

17 done one of my songs pretty cool. It's a video on

18 YouTube. But, no, I guess, I haven't produced any.

19 Q. Yeah. You've not worked as a video

20 production artist --

21 A. No.

22 Q. -- or anything?

23 A. No.

24 Q. Okay. Mr. Johnson, let's talk a little bit

25 about Joe Schreibvogel; okay?

Page 20

1 When did you first meet or have contact

2 with Joe?

3 A. 2012 or '13.

4 Q. How did that come about?

5 A. I explained to Heather. He had an ad on

6 Craigslist in Oklahoma searching for whatever, a

7 grip or whatever for some television project he was

8 working on. So I just e-mailed the guy and, I am a

9 song writer. Do you need a theme song?

10 You know, I got the ball rolling with Joe.

11 Q. Okay. So you saw an ad from him on

12 Craigslist --

13 A. Right.

14 Q. -- in 2012 or '13?

15 A. Right.

16 Q. You reached out to him in Oklahoma,

17 e-mailed him?

18 A. Yeah, which is not unusual, because I -- 50

19 states -- I'd go through every state looking for

20 work, you know, (indicating).

21 Q. I see. Is that something that you did to

22 try to find projects?

23 A. Correct. Right.

24 Q. All right. So you e-mailed him. Do you

25 remember what e-mail address you used to e-mail him?

Page 21

1 A. His e-mail?

2 Q. Yeah. Do you have any idea what the actual

3 e-mail address was?

4 A. Joe Exotic. That's all I remember.

5 Q. Would you still have a record of those

6 e-mails?

7 A. No. Everything from that guy's been

8 deleted when the computer crashed about six months

9 ago, you know. So it's, Joe Exotic, whatever. I

10 don't know.

11 Q. All right. So what was the next step once

12 you reached out to him? Obviously he got back to

13 you?

14 A. Right. He said, All right. You know, I'm

15 working on a TV show.

16 And then I talked to him. I never heard of

17 the guy, but evidently he had a show on Animal

18 Planet at one time. I talked to my sister, and she

19 knew who the guy was. I'd never heard of him.

20 Q. When you say, The guy, you mean, Joe --

21 A. Joe. Right.

22 Q. -- Schreibvogel? Joe Exotic?

23 A. Yes. So that's how it started.

24 Q. All right. And ultimately, did their --

25 what did that evolve into?

Page 22

1 A. I wrote a song for him.  
 2 Q. For this TV that he was working on?  
 3 A. For this TV show, correct. Yeah.  
 4 Q. Do you remember any details about what he  
 5 said the show was about? I mean, for example, was  
 6 it a documentary? Or was it, like, a reality show?  
 7 A. Yeah. It was a reality show. The Joe --  
 8 Kardashian-type show, you know.  
 9 Q. Okay.  
 10 A. Him and his tigers running around.  
 11 Q. Okay. Did he send you anything in terms of  
 12 giving you any ideas about the type of theme song he  
 13 was looking for?  
 14 A. No. Not on that one, no. It's about  
 15 tigers. Well, yeah, actually, he had about the  
 16 possible extinction of tigers, you know.  
 17 Q. So he told you he wanted a theme song that  
 18 centered around --  
 19 A. Tigers.  
 20 Q. -- tigers or the possible extinction of  
 21 tigers?  
 22 A. Correct. And the hunting of tigers, now  
 23 that I think about it. Yes.  
 24 Q. Okay. And so how did -- I guess how did  
 25 you go from there, Mr. Johnson, when you --

Page 23

1 A. Wrote the song. Called Danny. You know,  
 2 Danny was a singer.  
 3 Q. You said, Danny Clinton?  
 4 A. Correct.  
 5 Q. Okay.  
 6 A. Went in and did the song.  
 7 Q. And at that point, had you and Danny  
 8 Clinton been working on other projects already?  
 9 A. Sure.  
 10 Q. So at that point, you already had an  
 11 established relationship with Danny?  
 12 A. Correct.  
 13 Q. Okay. Did you -- during that initial time  
 14 period, did you communicate with Joe other than by  
 15 e-mail?  
 16 A. I've talked to Joe twice in my life on the  
 17 phone.  
 18 Q. Have you ever met Joe in person?  
 19 A. No. Huh-uh. Never been to Oklahoma.  
 20 Q. You've never been to Oklahoma?  
 21 A. No. I don't know how I missed that. I've  
 22 been to 30-some states, but somehow I didn't get to  
 23 Oklahoma.  
 24 Q. Yeah. Obviously some of your music style  
 25 and stuff I think probably would do well in

Page 24

1 Oklahoma.  
 2 A. Thanks.  
 3 Q. But I'm surprised you haven't been through  
 4 there.  
 5 Okay. So most of your communication was  
 6 e-mail. Over the years, you only spoke to him twice  
 7 on the phone?  
 8 A. Correct. Right.  
 9 Q. Okay. Did you guys ever message each other  
 10 through Facebook?  
 11 A. No.  
 12 Q. Okay. Do you have a Facebook page?  
 13 A. I do, but it's unattended. My ex put it up  
 14 ten years ago, and I've never used it, you know.  
 15 Q. Okay.  
 16 A. The stuff's witchcraft to me. I don't know  
 17 anything about that stuff, you know.  
 18 Q. Sure. Over the years in communicating with  
 19 Joe, Mr. Johnson, did you use the same e-mail  
 20 address?  
 21 A. Yes.  
 22 Q. In other words, was there ever a time when  
 23 Joe contacted you and said, Hey, my e-mail address  
 24 is changing. Use this e-mail address, as opposed to  
 25 what you were using?

Page 25

1 A. No. I don't know.  
 2 Q. Who -- at least at that initial time  
 3 period, was it you who had the primary contact with  
 4 Joe, as opposed to Danny?  
 5 A. Correct.  
 6 Q. Okay. And when Joe talked to you about  
 7 writing that first theme song, do you remember what  
 8 ended up being the name of that song?  
 9 A. I Saw a Tiger.  
 10 Q. The name of the song was, I Saw a Tiger?  
 11 A. Correct.  
 12 Q. Okay. And you wrote all the melody and  
 13 lyrics for it?  
 14 A. Correct.  
 15 Q. Did Joe also talk about getting a group of  
 16 musicians and singers for that song?  
 17 A. No.  
 18 Q. Okay. Was he going to -- I guess how did  
 19 you -- why did you contact Danny?  
 20 A. Because he was my singer.  
 21 Q. Okay. I guess what I'm trying to get at is  
 22 how did you know Joe needed a singer, as opposed to  
 23 writing the song and him singing the song?  
 24 A. I'm sure that was conveyed to me somehow.  
 25 You know, he was looking for a song, a finished

Page 26

1 product.  
 2 Q. Vocals, music, and everything?  
 3 A. Correct. Right.  
 4 Q. Okay. In talking with Joe, did you ever  
 5 get an understanding from him that he would sing the  
 6 song?  
 7 A. No.  
 8 Q. Okay.  
 9 A. No.  
 10 Q. So I guess what I'm getting at is, to the  
 11 extent that Joe has held himself out to the public  
 12 and others that he's the singer on --  
 13 A. He -- I'm sorry.  
 14 Q. -- that he's the singer on that song, that  
 15 would be false; correct?  
 16 A. He's committed fraud all along. He was  
 17 Milli Vanilli, you know.  
 18 Q. Okay.  
 19 A. Yeah. I mean, there's no other way to put  
 20 it. You know, he was selling his -- whatever.  
 21 Q. The songs that you -- we'll just start with  
 22 that first song, I Saw a Tiger. That was the very  
 23 first one that you wrote and recorded for Joe;  
 24 correct?  
 25 A. Uh-huh.

Page 27

1 Q. Is that yes?  
 2 A. Yes.  
 3 Q. Where was that song recorded?  
 4 A. Here in Vancouver.  
 5 Q. Do you remember the name of the studio?  
 6 A. Yeah. I believe it's Quality, Victor  
 7 Sorisio.  
 8 Q. Victor Sorisio?  
 9 A. Yeah.  
 10 Q. I've heard that name.  
 11 A. Okay.  
 12 Q. To your knowledge, did Joe pay for the  
 13 studio time and handle that? Or did you guys pay  
 14 for it?  
 15 A. Correct. Yeah.  
 16 Q. You didn't pay for it, Joe did?  
 17 A. I never -- not a dime. Right.  
 18 Q. Did you have any conversations with  
 19 Mr. Sorisio about Joe's payment for the studio time?  
 20 A. No. Vic didn't complain, so he must have  
 21 got paid.  
 22 Q. And that's really my question, Vince.  
 23 A. Right.  
 24 Q. If you had any conversations with Victor  
 25 Sorisio or anybody at Quality studio for payment of

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1 the studio time for Joe Schreibvogel?  
 2 A. No.  
 3 Q. You have no idea how he paid them?  
 4 A. No.  
 5 Q. Have you ever done any recording or studio  
 6 work for Joe Schreibvogel in a studio outside  
 7 Vancouver, Washington?  
 8 A. No.  
 9 Q. Have you ever heard of a studio in Dallas,  
 10 Texas, called Valley of the Kings?  
 11 A. No.  
 12 Q. Other than Danny Clinton, are there any  
 13 other individuals who were involved in writing and  
 14 producing the -- that first song, I Saw a Tiger?  
 15 A. No.  
 16 Q. The -- did you do all the instruments --  
 17 instrumental work on that?  
 18 A. I didn't do any of it.  
 19 Q. You didn't do any of it?  
 20 A. I didn't do any of it. I just gave the  
 21 song to Danny. It was such a simple song, him and  
 22 Vic done it.  
 23 Q. Who played the instruments?  
 24 A. Him and Vic.  
 25 Q. Victor Sorisio?

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1 A. Yeah.  
 2 Q. And Danny Clinton did all of the instrument  
 3 work?  
 4 A. Correct.  
 5 Q. On that song, I Saw a Tiger, there would  
 6 have been a base guitar; right? A lead guitar?  
 7 A. Basic track. Right.  
 8 Q. Was there any -- I'm trying to understand  
 9 how many instruments were involved.  
 10 A. Maybe five. But Vic plays 15. I mean...  
 11 Q. Got you.  
 12 A. You know, it was a simple song, you know.  
 13 Q. So it's not as though there was a band of  
 14 five or six folks brought in?  
 15 A. There's never been a band. Me, Danny, Vic,  
 16 or whatever studio we're using at the time.  
 17 Q. I got you. Is there any reason you didn't  
 18 do any of the studio work?  
 19 A. Why should I? It's a simple song.  
 20 Q. I was just curious.  
 21 A. No.  
 22 Q. Did you sing any of the harmony vocals on  
 23 that song?  
 24 A. No, no. I just wrote the song. That's it.  
 25 That's my extent of it.



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1 Q. Okay. After the song, I Saw a Tiger, did  
2 you do -- write any more songs for Joe?  
3 A. Yes.  
4 Q. What was the next song that you wrote for  
5 Joe?  
6 A. It was either about his brother, or that  
7 nut in Ohio, that Terry Thompson that let his tigers  
8 and stuff loose.  
9 Q. The Zanesville, Ohio situation?  
10 A. Yeah, yeah, exactly. It was one of the  
11 two. I forget which one.  
12 Q. Let me ask you this: Do you have a list  
13 anywhere of songs that you've written for Joe?  
14 A. Yeah. I'm telling you. It's those three.  
15 Q. There's three?  
16 A. Right.  
17 Q. There's no more than three?  
18 A. Right.  
19 Q. Okay. So there's, I Saw a -- a Tiger?  
20 A. (witness nods head.)  
21 Q. And then the next one was?  
22 A. G.W. and Me, and then the Terry Thompson  
23 story. I'm forgetting the name of it. The Terry  
24 Thompson story. If you give me a second, I'll think  
25 of it.

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1 Q. Yeah. Sure.  
2 A. You got a computer, you can -- it's on  
3 YouTube, I guess.  
4 Q. You'll think of the name here in a minute?  
5 A. Yeah. Yeah.  
6 Q. But those three songs are the only ones  
7 that you wrote for Joe?  
8 A. Right.  
9 Q. And after you wrote I Saw a Tiger, were the  
10 next two songs, G.W. and Me and the one about the  
11 situation in Zanesville Ohio, were those for a  
12 specific project or an album? Or do you know?  
13 A. He just -- you know, he wanted something  
14 for the -- a tribute to his brother, his dead  
15 brother supposedly. He wanted money. He wanted to  
16 play on people's sympathy, I assume. I don't think  
17 it was genuine.  
18 And then his buddy, the kook in Ohio, in  
19 Zanesville.  
20 what was the question?  
21 Q. I guess I'm trying to understand. Did he  
22 talk to you about trying to put a full album of  
23 songs together?  
24 A. Oh, that was never discussed. I didn't  
25 know he had an album out until he released it.

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1 Q. On those three songs, did Joe ever send you  
2 any paperwork to execute, like you would execute  
3 when someone hires you, like for a work for hire?  
4 For example to say, I'm hiring you to do these, but  
5 I retain all rights to the songs?  
6 Do you recall if there was ever any  
7 paperwork like that, Mr. Johnson?  
8 A. Confidentiality agreements, you know. I  
9 don't know.  
10 Q. Well, and I just want to ask you if you  
11 remember if he sent you any paperwork to sign in  
12 doing those songs.  
13 A. I don't remember.  
14 Q. All right. Would there be anything we  
15 could look at that would help refresh your memory on  
16 that? Anyplace we could look or...  
17 A. If I get home, maybe I'll dig around. I  
18 mean, nothing comes to mind.  
19 Q. That's fair.  
20 A. Yeah.  
21 Q. Other than yourself, and Joe, and Danny  
22 Clinton, and Victor Sorisio, would there be, to your  
23 knowledge, anybody else who would have been involved  
24 in those -- the writing and recording of those three  
25 particular songs?

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1 A. No. Not for those songs.  
2 Q. Okay. Were all three of the songs that  
3 wrote recorded here in Vancouver, at Victor  
4 Sorisio's place?  
5 A. Yeah.  
6 Q. Got it. And did you play instruments on  
7 any of them?  
8 A. No. They were so simple, I just, you know,  
9 gave them to Danny, and he went in and done them.  
10 Q. Okay. Okay. When you were -- when you  
11 contacted Joe, and then he got back with you, and  
12 you guys did these songs, or you did the songs, did  
13 he ever talk to you about them being done for him  
14 personally versus G.W. Exotic Animal Park, or G --  
15 or Garold Wayne Interactive zoological Foundation?  
16 A. Repeat that.  
17 Q. Yeah. what I'm getting at is was there  
18 ever any discussion about who was hiring you to do  
19 the songs? Was it just always Joe? Or was it the  
20 zoo?  
21 A. No, it was Joe. Right.  
22 Q. Did -- did Joe ever talk to you about  
23 recording the songs to promote the zoo in Oklahoma?  
24 A. No. But I assumed. I mean, we never had  
25 discussion about, you know -- no. I mean, that

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1 was -- you know, water's wet. I mean, we never  
 2 discussed it.  
 3 Q. I think you may have answered this, but I  
 4 want to make sure our record's clear, Mr. Johnson.  
 5 With respect to when you were initially  
 6 asked by Joe to write these songs, and then  
 7 ultimately Danny Clinton and Victor Sorisio recorded  
 8 them in the studio --  
 9 A. Uh-huh.  
 10 Q. -- at that time did you have an  
 11 understanding that Joe was putting songs together to  
 12 put on an album to pass off as his own music and  
 13 songs?  
 14 A. No. I didn't know that.  
 15 Q. If you had known that at the time, would  
 16 that have changed what you would have done?  
 17 A. No. He can eat them as far as I'm  
 18 concerned, you know. I don't care. They're simple  
 19 little songs.  
 20 Q. Sure.  
 21 A. I had no emotional attachment to them.  
 22 They were about his brother, you know.  
 23 Q. Is it fair for me to say that at that time  
 24 you were just doing the song for him, and what he  
 25 did with them after that was his business?

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1 A. Right. And to me it was like an exercise.  
 2 Can I write about something that doesn't interest  
 3 me? You know, I wanted to see if I could do it.  
 4 It's kind of an exercise.  
 5 You know, what he done with the songs  
 6 after, really, I could care less, man.  
 7 Q. Did Joe ever talk to you about -- or tell  
 8 you that he wanted you to keep quiet about the fact  
 9 that he's not singing those songs on those  
 10 recordings?  
 11 A. Yeah. That came up after a while.  
 12 Q. Okay.  
 13 A. Yeah.  
 14 Q. Okay. Do you remember when that came up?  
 15 A. It was in that period of those three songs,  
 16 you know. Know exact the date, I don't know.  
 17 Q. Can you help me nail down a year?  
 18 A. Oh.  
 19 Q. Are we talking about --  
 20 A. '13.  
 21 Q. Okay. '13?  
 22 A. Right.  
 23 Q. So sometime in '13?  
 24 A. '13, early '14.  
 25 Q. Would it have gotten into the '15 -- 2015?

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1 A. No.  
 2 Q. So in 2013 or 2014, at some point the  
 3 conversation or -- was it a conversation? Or was it  
 4 by e-mail?  
 5 A. E-mail.  
 6 Q. And do you remember, can you tell me just  
 7 what he said, or what the e-mail said?  
 8 A. Okay. Now what's your question?  
 9 Q. About keeping quiet about who is singing  
 10 the songs --  
 11 A. Oh, right.  
 12 Q. -- and who played the music.  
 13 A. Right. That came up with a -- because I  
 14 saw a Tiger, it had 20,000 hits or some bullshit --  
 15 excuse my language, some nonsense on YouTube that --  
 16 I forget the exact wording. But, you know, people  
 17 seem to like me and my voice kind of thing.  
 18 And whatever, man. You want to be Wayne  
 19 Newton, you know.  
 20 Q. I guess that's what I'm getting at.  
 21 A. Right.  
 22 Q. Was there -- in that contact from him, did  
 23 you understand that he was telling you, Don't tell  
 24 anybody that that's not me singing and playing these  
 25 songs?

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1 A. Correct. Right.  
 2 Q. Okay. Do you know why that -- was he  
 3 worried about you trying to take credit for that  
 4 song?  
 5 A. Who knows what goes on inside that brain of  
 6 his, man, you know.  
 7 Q. And that's fair. I guess a better question  
 8 would be, did he tell you specifically why he didn't  
 9 want you talking about it?  
 10 A. As I recall, it was just like I say, that  
 11 the -- he liked the music, and he was getting a  
 12 little few pats on the back from them, and I think  
 13 he thought -- you know, he was saying, Hey, I always  
 14 wanted to be a country music star, here's my chance,  
 15 just keep this idiot quiet. You know, as long as  
 16 nobody spills the beans. To me, it was harmless.  
 17 So what? You know.  
 18 Q. It didn't matter to you?  
 19 A. No.  
 20 Q. Have you ever heard Joe sing?  
 21 A. No. I haven't.  
 22 Q. Okay.  
 23 A. But he's got a terrible speaking voice. If  
 24 you've seen any of his videos, like fingernails on a  
 25 blackboard.

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1 Q. Did you and Mr. -- Danny Clinton, ever talk  
2 about that issue?

3 A. Yeah. And Danny was like, The hell with  
4 it. He really didn't care either, you know.

5 Q. Do you remember any of the specifics of  
6 conversations with you and Danny about that issue,  
7 about keeping quiet about who was singing and  
8 playing those songs?

9 A. Well, just that, you know. I mean, it was  
10 never really discussed. It was just, you know, let  
11 him have his fun.

12 Q. Did -- do you know if Joe reached out to  
13 Danny separately about that issue?

14 A. I'm sure he did.

15 Q. Okay.

16 A. Yeah.

17 Q. And why -- how are you sure that he did?  
18 Did Danny tell you he did?

19 A. Well, it was years ago. But, you know, I  
20 know they were corresponding, so, you know...

21 Q. And I understand, Mr. Johnson -- I know  
22 some of these things I'm asking you have been back  
23 in '13, '14, and we sit here today in February of  
24 2018.

25 A. I spoke --

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1 Q. And I understand you're searching your  
2 memory.

3 A. Okay.

4 Q. And just do the best you can for me, and  
5 that's all I ask; okay?

6 A. No. Absolutely.

7 Q. Mr. Maldonado, Joe, has testified that  
8 there was a written agreement between and among you,  
9 and he, and Danny Clinton of confidentiality about  
10 these songs.

11 A. Hmm.

12 Q. Is that true?

13 A. Well, again, you know, I'll need to check  
14 on that.

15 Q. As we sit here today, do you recall ever  
16 executing, signing, any kind of a written  
17 confidentiality agreement among you, and Danny, and  
18 Joe?

19 A. Maybe. Perhaps.

20 Q. Okay. Where -- where could you look to  
21 determine if that existed?

22 A. I've got stacks of writing paper, I mean,  
23 literally, boxes of -- you know, I never throw away  
24 any of that stuff, so, I mean, if it's there, I'll,  
25 you know, dig it out.

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1 Q. Will you do that for me?

2 A. Absolutely.

3 Q. Will you look in your records --

4 A. Absolutely.

5 Q. -- over the next few days and see if you  
6 can find anything like that?

7 A. I will. And I can send that to you in  
8 sunny Oklahoma.

9 Q. Okay. Other than the possibility that  
10 there might be a written agreement, do you remember  
11 any other written document being executed related to  
12 the writing and recording of these songs that you  
13 were involved with?

14 A. No.

15 Q. As we sit here today, Mr. Johnson, do you  
16 currently have any projects that you're working on  
17 for Joe?

18 A. No. Absolutely not.

19 Q. Do you have any projects that are planned  
20 for the future to do with Joe?

21 A. Fuck no. Excuse me. No, I do not.

22 Q. The songs that you --

23 A. Sorry about that. I was just apologizing  
24 to the ladies.

25 But, no, I have nothing to do with that

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1 guy. Absolutely not.

2 Q. With respect to the songs that you wrote  
3 for Joe, the three that we discussed --

4 A. Uh-huh.

5 Q. -- what's your process? Do you write those  
6 down, actually, physically? Or, you know, I know  
7 some guys just will sing into a tape recorder and --  
8 or they used to. Tape recorder, I guess they don't  
9 use those much anymore.

10 But I guess my point is, do you keep all  
11 the notes and drafts, whether it's on a piece of  
12 paper, or a napkin, or in the middle of the night,  
13 you know, how you wake up and you've got a thought  
14 about a line in a song and you jot that down at  
15 three o'clock in the morning?

16 Do you keep all that stuff?

17 A. Correct. Yes, absolutely, on songs that  
18 mean something to me. And at the time I was writing  
19 those, I did, but, you know, whether I have that  
20 now, I don't know.

21 Q. And that was kind of my question.

22 A. Right.

23 Q. I know -- so some songwriters, they really  
24 protect that as their, sort of, intellectual process  
25 that's really important in how they write songs.

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1 I don't know if you've ever been to the  
 2 Rock & Roll Hall of Fame in Cleveland, Ohio?  
 3 A. I haven't, no.  
 4 Q. If you haven't, you should some day,  
 5 because some of the cool things they have is some of  
 6 the napkin writings or sketches from bands where  
 7 they've written famous songs.  
 8 A. Right.  
 9 Q. So that always struck me, because I know  
 10 songwriters like you do the exact same thing. And  
 11 wherever the idea strikes them, that's where they  
 12 write it down.  
 13 And I guess what I'm getting at is, to the  
 14 extent there is anything that you have that would  
 15 help us nail down specific dates, that would be  
 16 helpful in terms of when a song was written and  
 17 provided.  
 18 A. Oh, yeah. The studio would have all that  
 19 info.  
 20 Q. Okay.  
 21 A. Yeah. I have the songs, I mean, when they  
 22 were sent to me from the studios. I can give you  
 23 specific dates.  
 24 Q. Okay. Perfect.  
 25 Do you still work with Victor Sorisio any?

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1 A. Well, it's been --  
 2 Q. I mean, I understand you've been dealing  
 3 with some health issues, Mr. Johnson, so I don't  
 4 mean in the last few months.  
 5 In other words, you're not on the outs with  
 6 Victor Sorisio?  
 7 A. No. I like Vic. He's a good guy.  
 8 Q. All right. When was the last time where  
 9 you were having a song recorded at his place?  
 10 A. Years ago. I don't recall.  
 11 Q. Okay.  
 12 A. A good three, four years ago, I think.  
 13 Q. To your knowledge, is his studio still up  
 14 and running and still doing work?  
 15 A. Yeah, to my knowledge.  
 16 Q. All right. There's a -- have you, since,  
 17 say, 2014 done any -- excuse me, have you written  
 18 any songs for Joe at his request?  
 19 A. No.  
 20 Q. There's a song that I heard about, I think  
 21 you may have even mentioned it to our client, called  
 22 Killer Carole?  
 23 A. Oh, Oh, yeah. Okay.  
 24 Q. Was that a song you wrote?  
 25 A. Yeah.

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1 Q. Okay. And when did you write that song?  
 2 A. In the beginning, you know.  
 3 Q. In 2013 or '14?  
 4 A. Right.  
 5 Q. Okay. That song, to your knowledge, has  
 6 that been put on a CD or released --  
 7 A. No.  
 8 Q. -- to the public?  
 9 A. No. No.  
 10 Q. Did anybody co-write that with you?  
 11 A. No.  
 12 Q. Tell me how that came about. I mean, I'm  
 13 guessing Joe called you or e-mailed you and said, I  
 14 want you to write this song about this subject  
 15 matter.  
 16 A. Yeah. And then there was an article in  
 17 People magazine or whatnot about her husband.  
 18 Mysteriously, they still haven't found his body.  
 19 Q. Did -- how did you come across that  
 20 article?  
 21 A. He sent it to me.  
 22 Q. Joe did?  
 23 A. Yeah. It was, you know, click here and  
 24 People magazine. I believe it was People. It could  
 25 have been something else.

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1 Q. Did he -- did you ask him why he wanted you  
 2 to write a song -- that song?  
 3 A. Yeah. Somehow, I mean, it came up, you  
 4 know, his hate for Carole. Maybe that was the first  
 5 time I ever heard her name, you know. That --  
 6 Q. Sure.  
 7 A. -- she's on crack, among other things, you  
 8 know, she's evil, she's out to get me.  
 9 Q. That's what Joe was saying?  
 10 A. Yeah. And then he would tell me his side  
 11 of the story. But if you did any research on it,  
 12 you know, he ripped the woman off, you know.  
 13 Q. Well, and -- yeah. You mean the research  
 14 about the lawsuits in Florida --  
 15 A. Correct. Yes.  
 16 Q. -- between the company, Big Cat Rescue, the  
 17 non-profit in Florida?  
 18 A. Right. The PW, Phil Jones, Gootenanny  
 19 (phonetic), or whatever the hell his name is.  
 20 Q. And you understand that Carole Baskin,  
 21 Ms. Baskin is not an individual party to any of  
 22 these lawsuits.  
 23 Do you understand that?  
 24 A. No.  
 25 Q. I mean, you're telling me things that Joe

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1 has told you, but just for the record, you  
2 understand that Big Cat Rescue is the only plaintiff  
3 in these lawsuits? That Ms. Baskin is not an  
4 individual party or plaintiff in the lawsuit?  
5 A. She is Big Cat Rescue.  
6 Q. You understand that's an entity. Just for  
7 the record, so the record's clear, there's not --  
8 Ms. Baskin is not an individual party.  
9 A. You're muddying the water.  
10 Q. I want to make sure the record's clear.  
11 Because you were saying about the first time you  
12 heard her name, and Joe ripped her off.  
13 A. Right.  
14 Q. I just want to make sure the record's clear  
15 that we're talking about the entity, Big Cat  
16 Rescue -- Texas Big Cat Rescue Corp. of Florida, a  
17 not-for-profit corporation.  
18 But, again, I understand that some of this  
19 information is what you were told by Joe at the  
20 time; is that right?  
21 A. Right. Right.  
22 Q. And he contacts you and he tells you, I  
23 want you to write this song about Carole Baskin?  
24 A. Right.  
25 Q. And he sends you this article in Time

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1 magazine?  
2 A. Time, People, whatever. It was in some  
3 magazine.  
4 Q. Did you ask him why he wanted this song  
5 written, or what he was going to do with it?  
6 A. Like I say, he told me he was involved in a  
7 lawsuit, she's a crackhead, taking everything I've  
8 got. She murdered her husband, you know.  
9 Q. These are things he's telling you?  
10 A. Right. And if you read the article, you  
11 know...  
12 Q. Did -- did he indicate whether or not he  
13 wanted you to write that song to try to do personal  
14 harm to Mrs. Baskin?  
15 A. No. He didn't put it like that. Just read  
16 the article, and he would tell me certain -- how  
17 he'd like the story to go, I guess. He gave me a  
18 broadsketch. But, no, he never -- he never said, I  
19 want to do damage to the woman.  
20 Q. Did you ask him what his intent was with  
21 the song? Or what he was going to do with it?  
22 A. I assumed he was going to put it out and  
23 maybe try to get it on stations in her neighborhood.  
24 I guess the big picture, you know, he wanted to hurt  
25 her with, you know -- well, he never told me that.

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1 Q. Well, you -- again --  
2 A. I mean, he didn't want the song for  
3 nothing. He had to have some reason.  
4 Q. And that's what I'm trying to understand,  
5 is how you gained your understanding to make that  
6 assumption that he was going to try to put that song  
7 out publicly?  
8 You say, In her neighborhood. I guess you  
9 mean in Florida and that area?  
10 A. Yeah. But he didn't say that, I'm just  
11 saying that. He wanted the song for some reason.  
12 Maybe he just wanted to stick it on YouTube, I don't  
13 know.  
14 Q. And I just want to make sure we're clear on  
15 the record. Did he ever tell you, I'm going to  
16 specifically do this or that with the song?  
17 A. No. He didn't.  
18 Q. Okay. Did you -- did you ask him, what are  
19 you going to do with this song?  
20 A. No.  
21 Q. The song ultimately did get recorded with  
22 you, but never published; correct?  
23 A. No. That song -- what do you mean?  
24 Q. Did anybody ever go in the studio and  
25 record that song?

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1 A. Yeah. A friend of mine in Nashville. You  
2 know, it was just -- I was -- at that point, that  
3 I'd seen Joe for what he was, all right. It was  
4 right at that point, after writing that song, you  
5 know, and then me and Danny were, you know, kind of  
6 on the outs then.  
7 Q. So wouldn't that have been toward the end  
8 of '14?  
9 A. Yeah.  
10 Q. Okay.  
11 A. Right.  
12 Q. And so Danny -- neither Danny Clinton nor  
13 Victor Sorisio were involved in recording the demo  
14 for that song?  
15 A. No. Absolutely not. That song doesn't  
16 exist, you know.  
17 Q. Where was that song recorded?  
18 A. A friend of mine in Nashville, he's got a  
19 little studio.  
20 Q. An in-home studio?  
21 A. Yeah, exactly.  
22 Q. And what's his name?  
23 A. I'm not getting him involved. The song, it  
24 doesn't exist. I mean, so what?  
25 Q. Well, do you know if it was ever

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1 provided -- if a finished product was ever provided  
 2 to Joe?  
 3 A. It was. Right. No. No, excuse me, no.  
 4 It was never finished. That demo was, right. But,  
 5 no, no finished product was ever provided.  
 6 Q. So --  
 7 A. See, he has to have Danny sing it; correct?  
 8 I mean, he can't have my friend in Nashville singing  
 9 it, because this is Joe singing.  
 10 Q. It's a different voice from Danny's?  
 11 A. Right.  
 12 Q. For the record, we're talking about Danny  
 13 Clinton?  
 14 A. Right. So at that point when I wrote that  
 15 song, I was on the outs with Danny. I haven't  
 16 talked with Danny in years. Maybe Danny doesn't  
 17 want to sing it. So that song doesn't exist.  
 18 Q. Just so we're clear, there was a demo  
 19 recorded at your friend's in-home studio in  
 20 Nashville, but the song recording has never been  
 21 provided to Joe Schreibvogel, Maldonado?  
 22 A. The demo was, but it's absolutely no good.  
 23 Q. So you're saying Joe has the demo from the  
 24 other singer?  
 25 A. Right.

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1 Q. But Joe can't do anything with it, because  
 2 the voice is different than Danny Clinton?  
 3 A. Correct.  
 4 Q. Has Joe reached out to you -- strike that.  
 5 When was the last time Joe reached out to  
 6 you about recording that song?  
 7 A. Years ago.  
 8 Q. Okay. Do you know whether or not he's ever  
 9 talked to Danny Clinton about recording that song?  
 10 A. I doubt it.  
 11 Q. Well, do you know either way?  
 12 A. I don't know for a fact, no. But it would  
 13 have already been cut if -- you know, if he planned  
 14 on doing that. Plus, you know, I think he knows I'd  
 15 raise hell over it, you know. I think that scared  
 16 him off. That song's never going to see the light  
 17 of day.  
 18 Is this pretty boring to you guys?  
 19 MR. GIVENS: Do you need to take a break,  
 20 Mr. Johnson?  
 21 (Recess from 11:49 a.m. to 11:55 a.m.)  
 22 Q. (By Mr. Givens) All right. Mr. Johnson,  
 23 we had a brief break, bathroom break. We were  
 24 talking about when maybe the last time was Joe had  
 25 contacted you about the Killer Carole song.

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1 I'm going to mark as Exhibit 2...  
 2 (Deposition Exhibit Number 2 marked for  
 3 identification.)  
 4 Q. (By Mr. Givens) And see if -- maybe this  
 5 will help. That's an e-mail on December the 11th of  
 6 2017, where you're e-mailing Ms. Baskin. It says,  
 7 Joe really wants me to record this song I wrote for  
 8 him. I had a friend do a rough demo.  
 9 I'm assuming you mean the friend in  
 10 Nashville?  
 11 A. Right.  
 12 Q. But he wants me and the band to keep the  
 13 charade going. And he's willing to pay for it. I  
 14 would much rather help you to get this slimy  
 15 conniving creep.  
 16 A. I've got a way with words.  
 17 Q. You are a lyricist. What is it they say?  
 18 A modern day poet.  
 19 Is this consistent with your memory of when  
 20 Joe last contacted you about wanting that song done?  
 21 A. Yeah. Right. I knew it was in that time  
 22 period.  
 23 Q. Okay.  
 24 A. And let me explain this.  
 25 Q. Sure.

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1 A. Carole contacted me. That's -- you know.  
 2 And I shouldn't have got with her. You know, I feel  
 3 bad about that. You know, the song -- who wants  
 4 some, you know, crummy song about yourself.  
 5 But I was thinking -- again, I apologize  
 6 for this. Well, you know, she knows I'm a  
 7 songwriter, maybe I'll write songs for her.  
 8 Q. Sure.  
 9 A. And I'd write songs about Joe, you know.  
 10 I'd make him jump off a bridge, you know.  
 11 Q. Sure. Is that kind of what you're talking  
 12 about, is -- look, this is your -- this is your  
 13 trade. This is what you do for a living, is you  
 14 write songs?  
 15 A. Right.  
 16 Q. Is that what you mean by, A man has to eat?  
 17 A. Right. I had no personal beef against this  
 18 person.  
 19 Q. Sure.  
 20 A. She could walk in here right now and I  
 21 wouldn't know it.  
 22 Q. Sure. At this time, Mr. Johnson, was Joe  
 23 offering you anything, any money to record this song  
 24 at this point?  
 25 A. No.

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1 Q. Okay. What was the contact? Was it just,  
 2 Hey, I want -- I want to get this song recorded and  
 3 go forward with this?  
 4 A. Yeah. The TV show was always the promise,  
 5 man. That was the pot of gold, yeah.  
 6 Q. Explain that to me a little bit.  
 7 A. His alleged TV show (indicating), you know.  
 8 Q. Even in this late December time frame, he  
 9 was still saying that was a possibility?  
 10 A. Correct. Right.  
 11 Q. Okay. Did he give you any specifics on,  
 12 you know, when production was set to start, or how  
 13 the TV show was progressing?  
 14 A. As I recall it, it already was -- you know,  
 15 the wheels were in motion. I believe he mentioned  
 16 some production company, which I can't remember.  
 17 But my understanding was the wheels were in motion,  
 18 you know.  
 19 Q. Okay.  
 20 A. Like I say, I -- you know, it's the  
 21 offhanded remark to my sister about the guy. Oh,  
 22 I've seen that -- you know, I've seen the guy on the  
 23 Animal channel. So I think at one time he did have  
 24 a show.  
 25 Q. Well, and I know you talked about the --

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1 back in late 2014, I think, the -- he told you about  
 2 the show, and that's why he wanted the first song  
 3 done.  
 4 Is that in your eyes?  
 5 A. No. That's fine. I'll move over.  
 6 Q. So even from 2014 to the end of 2017, three  
 7 years later, he was still talking about this reality  
 8 show to you?  
 9 A. '17? Why would you bring up '17?  
 10 Q. Because that e-mail is from 2017. That  
 11 Exhibit 2, that's an e-mail dated December 11th,  
 12 2017.  
 13 A. Oh, oh. That's the one I just sent Carole.  
 14 Q. Right. Right. Where you're saying that,  
 15 Joe really wants me to do this song.  
 16 A. Right. Yeah. But, no, I hadn't spoke to  
 17 him in a couple of years about --  
 18 Q. Okay. I misunderstood.  
 19 A. Right.  
 20 Q. Let's clarify the record. At the time you  
 21 e-mailed Ms. Baskin on December 11th, 2017, prior to  
 22 December 11th, 2017, do you remember when the last  
 23 time is you had any contact with Joe?  
 24 A. A couple years.  
 25 Q. So it would have been in 2015 or '16?

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1 A. Something like that, yeah.  
 2 Q. Did Joe contact you in 2017 about doing  
 3 this song?  
 4 A. No.  
 5 Q. Is it fair for me to say that this e-mail  
 6 was you reaching out to Ms. Baskin to try to get  
 7 some work from her? Or were you trying to sell this  
 8 particular song to her?  
 9 A. Because -- I apologize for this. A little  
 10 of both. You know, I sent her the song, you know,  
 11 what do you think of this?  
 12 Q. Okay.  
 13 A. And then you can read what I wrote, you  
 14 know (indicating). It's -- I wish I had never done  
 15 that. You can tell her that.  
 16 Q. Never done the song?  
 17 A. The song or contacted her, you know. I  
 18 mean, you can tell her that if you wish. I was  
 19 pretty bitter at this time. I knew I had been  
 20 ripped off by Joe, obviously.  
 21 Q. Sure.  
 22 A. You know, but trying to -- maybe she would  
 23 call me to write songs about him.  
 24 Q. Got you. I'm going to hand you what we'll  
 25 mark as a small grouping of documents, Mr. Johnson.

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1 I just want to ask you a few questions about the  
 2 content in them.  
 3 (Deposition Exhibit Number 3 marked for  
 4 identification.)  
 5 Q. (By Mr. Givens) That would be Exhibit 3.  
 6 And what this is, and it's a little bit -- we'll go  
 7 through it, and I'll kind of explain it to you.  
 8 It's kind of hard to read. But it's little sections  
 9 from some PayPal records. And these writings, I'll  
 10 represent to you that they are documents that have  
 11 been produced to us in the litigation.  
 12 But if we look at the first page, you'll  
 13 see at the top left-hand corner, in a little box,  
 14 there's a letter P, and the numbers 442.  
 15 A. Correct.  
 16 Q. First of all, have you seen any of these  
 17 records prior to me just handing them to you?  
 18 A. No.  
 19 Q. And you'll see that. And then if you go to  
 20 the right, there's the sentence or the phrase that  
 21 says, Here is your 1st payment, or, pmt, payment,  
 22 ready when you are, let's do this Joe.  
 23 And the date is 11/8/2014.  
 24 And then, Mckeown, M-C-K-E-O-W-N, is the  
 25 last name of a person. I believe it's Tracy

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1 McKeown.  
 2 Have you ever heard that name before?  
 3 A. No.  
 4 Q. And then it shows payment of \$2,000.  
 5 Is this consistent in -- in time with when  
 6 Joe was telling you about a reality show that he was  
 7 working on?  
 8 A. What date? Is this from -- yeah.  
 9 Q. November of 2014?  
 10 A. Yeah. For sure.  
 11 Q. Okay.  
 12 A. Of course.  
 13 Q. But you don't know the name McKeown, or  
 14 Tracy McKeown?  
 15 A. Never heard of him, or her.  
 16 Q. Did Joe ever tell you the name of the  
 17 company that he was working with to produce the  
 18 show?  
 19 A. He did. The production company, I -- I  
 20 don't know.  
 21 Q. Do you think you would have that in an  
 22 e-mail or a document anywhere, Mr. Johnson?  
 23 A. On that one, I seriously doubt. You know,  
 24 I think it was just bullshit. You know, he could  
 25 have said whatever.

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1 Q. All right. But -- and again, would you --  
 2 would you agree with me to, over the next week or  
 3 two, review your records and just see if there's  
 4 anything that you might have on this?  
 5 A. Sure. Absolutely, absolutely.  
 6 Q. Thank you.  
 7 And then we go down, you'll see there's  
 8 kind of a dotted line that separates one row from  
 9 the next.  
 10 A. Yes.  
 11 Q. And the next one, there's a 378, and then  
 12 there's the date of, 3/9/2014.  
 13 Do you see that?  
 14 A. Yeah.  
 15 Q. And then that box has, Danny Clinton.  
 16 Do you see that?  
 17 A. Yeah.  
 18 Q. And then it says, Completed, and then there  
 19 shows a payment for \$450.  
 20 Do you see that?  
 21 A. Yeah.  
 22 Q. Mr. Johnson, do you have any information or  
 23 knowledge about payments made from Joe to Danny  
 24 Clinton for any projects?  
 25 A. I have -- I have no idea. I mean, you

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1 know, I'm sure Danny wasn't working for free, or  
 2 he -- you know, he liked to smile. I'm sure he was  
 3 getting paid.  
 4 But, no, I have no -- no knowledge.  
 5 Q. If we go down to the next row, it's -- the  
 6 date is 3/20/2014 -- actually, right above that it  
 7 says P878, and then there's a box.  
 8 A. What are you on? The second page?  
 9 Q. I'm on the first page. I'm sorry.  
 10 A. Okay.  
 11 Q. Do you see the, P878 --  
 12 A. Yeah.  
 13 Q. -- on the left?  
 14 A. Yeah, yeah.  
 15 Q. And then to the right of that there's the,  
 16 Pmt, payment, for this ole town should make 1040.00.  
 17 Do you know what that reference is?  
 18 A. I have no idea.  
 19 Q. Have you written a song for Joe called,  
 20 This Ole Town?  
 21 A. Absolutely not.  
 22 Q. Do you have any knowledge about a song that  
 23 Danny Clinton may have done called This Ole Town?  
 24 A. You'll have to talk to Danny. I mean, you  
 25 know, I don't...

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1 Q. So you don't have any knowledge about it?  
 2 Is that what you're saying?  
 3 A. No.  
 4 Q. Okay.  
 5 A. I mean, the song's out there, you know.  
 6 But, no, I've --  
 7 Q. You didn't write it?  
 8 A. Correct.  
 9 Q. You weren't involved with it?  
 10 A. Correct. Right.  
 11 Q. Go down the page a little bit, you'll see  
 12 in the left-hand side there's a P804.  
 13 A. Okay.  
 14 Q. Still on the first page.  
 15 A. Okay.  
 16 Q. And then in the box, there's the phrase --  
 17 or the writing that says, Should take care of this  
 18 ole town and 50 toward the studio of the next if I  
 19 am on track.  
 20 Do you know what he's referencing there?  
 21 A. I have no idea.  
 22 Q. Then we go down to the next entry. It's on  
 23 2/24/14. It's another Danny Clinton payment.  
 24 And then if you'll flip to the second  
 25 page --



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1 A. (witness complies.)

2 Q. -- and go down in the middle, it says,

3 P1348, payment on My First Love.

4 Do you know of a song called My First Love?

5 A. Yeah.

6 Q. Who wrote that?

7 A. I did. That's my song.

8 Q. And do you know -- was that written for

9 Joe?

10 A. Hell no.

11 Q. It was not written for Joe?

12 A. No, absolutely not.

13 Q. Do you know if Joe put that on an album?

14 A. I -- I don't know.

15 Q. And -- okay. And it says, Paid Vince

16 500.00 you 500.00 leaves balance of 1500.00.

17 So just so the record's clear, is this the

18 first time you've seen anything -- information on

19 this?

20 A. As far as I can remember, yeah.

21 Q. Did --

22 A. I mean, I think he did rip off a couple

23 songs.

24 Q. Do you think this is one that he ripped off

25 from you?

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1 A. Right. Correct.

2 Q. Did -- did Joe pay you for that song? \*

3 A. No.

4 Q. Okay. Do you have any information about

5 whether he paid Danny Clinton for that song?

6 A. No idea.

7 Q. Okay. And --

8 A. Well, you can see below that, I mean, Let's

9 keep this between us. Let's keep this between us.

10 Q. Yeah. And that's what I was getting at.

11 If you go to the third page, Danny this is what is

12 in pay pal, sending it today, should make some money

13 this weekend, I have not sent vince any yet so

14 hush....lol i need to get pretty women -- well,

15 pretty women in the works so I will be paying you

16 first.

17 A. I don't think we have the same thing.

18 Q. I'm sorry. Go to the third page.

19 A. (witness complies.)

20 Q. There you go.

21 A. Okay.

22 Q. If you look at the last entry on the third

23 page --

24 A. Okay.

25 Q. -- it says, I've not sent vince any yet so

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1 hush....lol i need to get pretty women in the works

2 so I'll be paying you first. Know you need the

3 money.

4 Do you know what Pretty Women is

5 referencing?

6 A. Yeah, Pretty Women Lover.

7 Q. And did you write that song?

8 A. Yeah.

9 Q. And did you write that for Joe?

10 A. No.

11 Q. He just used it?

12 A. He used it. Like I say, my frigging memory

13 is messed up, but he used a few of my songs. That's

14 some of the reasons that I'm so pissed at him. He

15 stole them.

16 Q. Just took songs that you wrote for other

17 purposes and put them on an album?

18 A. Correct.

19 Q. Do you know whether or not -- for example,

20 on Pretty Women Lover, did he have Danny go record

21 that again and then put it on his album without

22 telling you?

23 A. I don't know.

24 Q. Did -- have you ever contacted Joe and told

25 him that he didn't have the right to do those songs?

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1 A. Yes. And he quit -- you know, we quit

2 corresponding until he sent me your -- that summons

3 I received. You know, the --

4 Q. When is the first time that you learned of

5 him taking a song of yours that was not -- that he

6 didn't have the authority to take?

7 A. About a month ago, when that Jeff dude

8 contacted me.

9 Q. Okay. And when -- Jeff Johnson?

10 A. Yeah.

11 Q. And when Jeff contacted you and alerted you

12 to that, did you contact Joe?

13 A. I tried to.

14 Q. And did you try to contact him on e-mail or

15 phone?

16 A. Phone. I tried to call him.

17 Q. Okay. And did you leave him a message?

18 A. Oh, yeah. I left him a message.

19 Q. Okay. What was the -- what was the

20 purpose -- the content or the subject of your

21 message?

22 A. You ripped me off, man.

23 Q. Okay. Did you ask him to call you back?

24 A. Absolutely.

25 Q. Did you make a demand for, You need to pay

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1 for those songs?  
 2 A. I don't remember. Probably.  
 3 Q. Okay. And did Joe call you back --  
 4 A. No.  
 5 Q. -- in response to those messages?  
 6 A. No. No.  
 7 Q. When was the next time you heard from Joe?  
 8 A. He sent me that summons.  
 9 Q. When he sent you a notice of the subpoena?  
 10 A. Correct. Right.  
 11 Q. In the notice of the subpoena, did he write  
 12 a note to you?  
 13 A. No -- yeah, he did. He -- now you got to  
 14 deal with Carole. She's a crackhead, she'll -- you  
 15 know, she's coming after you. F you type thing, you  
 16 know.  
 17 Q. Did you keep a copy of what he sent you?  
 18 A. No. Everything from that dude I just throw  
 19 away. It's bad luck to have that.  
 20 Q. So you didn't keep that handwritten note  
 21 from him?  
 22 A. No. No.  
 23 Q. Was it written on the notice? Or was it  
 24 written on a separate sheet of paper?  
 25 A. It was on a separate sheet of paper.

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1 Q. And that would have been something that you  
 2 received from him in the last three weeks?  
 3 A. Correct. Right.  
 4 Q. But he's still never addressed the issue of  
 5 stealing these songs from you?  
 6 A. I think he's just dug in, man. I don't  
 7 think he's going to, you know. So what, I think the  
 8 way -- the way he looks at it.  
 9 He did -- when I called him and -- you  
 10 know, and left a message, and stuff, he did take all  
 11 those songs off YouTube, though.  
 12 Q. Oh, he did?  
 13 A. Yeah, he did. And he took -- and he had a  
 14 sound page and a -- yes. SoundCloud, excuse me. He  
 15 had all the songs on there. He took them off.  
 16 Q. How many of his songs did he -- excuse me.  
 17 How many of your songs did he take without  
 18 your permission?  
 19 A. I don't know. A couple. A couple, anyway.  
 20 Q. Well, we know Pretty Women Lover.  
 21 A. Right, and My First Love.  
 22 Q. My First Love?  
 23 A. Right. And, Then I Saw Me.  
 24 Q. Okay. Then I Saw Me?  
 25 A. Yeah.

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1 Q. Those three?  
 2 A. Yeah.  
 3 Q. Do you know if there's any beyond those  
 4 three?  
 5 A. I don't know.  
 6 Q. Okay.  
 7 A. This -- according to Jeff, that those songs  
 8 were on his CD.  
 9 Q. Jeff Johnson?  
 10 A. Jeff Johnson.  
 11 Q. Do you have any plans to send Joe any  
 12 letter or writing demanding he destroy those CDs, or  
 13 not sell them, or anything?  
 14 A. Well, I called some lawyers there in your  
 15 territory, Oklahoma, and got a hold of one or two.  
 16 Well, it's a conflict here, we represent Joe.  
 17 So I got a hold of this one dude to send a  
 18 cease and desist letter. He said it cost a grand.  
 19 Okay. Man.  
 20 And then he said, well, we just don't like  
 21 to make idle threats. You know, we're going to need  
 22 five grand to see this thing through.  
 23 Q. I understand. You basically told --  
 24 A. Your colleague there.  
 25 Q. Well, I wouldn't say my colleague. You

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1 didn't talk to anybody in my office; right?  
 2 A. I did. But like I say, they wouldn't talk  
 3 to me because there was a conflict of interest.  
 4 Q. So it wasn't my office --  
 5 A. Right.  
 6 Q. -- that said, Five grand to do this or  
 7 that?  
 8 A. Right, yeah.  
 9 Q. But you talked to a lawyer in Oklahoma, and  
 10 the cost to move forward was prohibitive?  
 11 A. Yeah. What's a song worth? To me, they're  
 12 worth a million dollars, or they're garbage. What's  
 13 a song worth?  
 14 Q. No. I understand. I'm just trying to  
 15 understand, from your standpoint, you feel like you  
 16 would -- if you wanted to pursue it and could pursue  
 17 it, you feel like you would have a claim against him  
 18 for copyright infringement and misappropriation of  
 19 your songs?  
 20 A. Fucking A, yes. Absolutely.  
 21 Q. Okay.  
 22 A. Sorry. Absolutely, yes. He flat out stole  
 23 them.  
 24 Q. Mr. Johnson, do you have any records  
 25 similar to Exhibit 3 dealing with Joe's payment to

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1 Victor Sorisio or the studio here in Vancouver?  
 2 A. No, absolutely not.  
 3 Q. Do you have any records relative or showing  
 4 payment by Joe to Danny Clinton for recordings or  
 5 work that he's done?  
 6 A. Absolutely not.  
 7 Q. Mr. Johnson, do you have any records in  
 8 your possession showing any payments from Joe to  
 9 yourself?  
 10 A. No.  
 11 Q. Was Joe supposed to pay you for the three  
 12 songs you had to write for him?  
 13 A. Yes.  
 14 Q. Did he ever pay you?  
 15 A. No.  
 16 Q. We spoke before, but just so the record's  
 17 clear.  
 18 If Joe were to say he did pay you, he's not  
 19 telling the truth; correct?  
 20 A. Correct. And there's a confidentiality  
 21 thing that -- you know, I'm not a lawyer, that I  
 22 don't know about.  
 23 Q. You think there might be a confidentiality  
 24 agreement somewhere?  
 25 A. Right.

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1 Q. And you're going to check your records for  
 2 that?  
 3 A. Right.  
 4 Q. I'm going to hand you what we'll mark just  
 5 collectively as Exhibit 4, Mr. Johnson.  
 6 (Deposition Exhibit Number 4 marked for  
 7 identification.)  
 8 THE WITNESS: And how do you guys have  
 9 access to Danny's -- you know...  
 10 Q. (By Mr. Givens) This -- I'm going to hand  
 11 you Exhibit 4.  
 12 A. No comment?  
 13 Q. If you'll look at that -- and, again, do  
 14 you recognize -- take a look at those two pages.  
 15 A. (Witness complies.)  
 16 Q. Those are dealing with where it looks to be  
 17 Joe saying he paid for studio time.  
 18 Do you have any information or records  
 19 regarding Exhibit 4?  
 20 A. No. Absolutely not.  
 21 Q. Do you have any information about how  
 22 Mr. Maldonado -- how Joe may have paid Victor  
 23 Sorisio?  
 24 A. Well, Vic's a reputable business person.  
 25 Q. I'm just asking you.

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1 A. I have no idea.  
 2 Q. Any information about how those payments  
 3 were made?  
 4 A. None.  
 5 Q. Same question with respect to Danny  
 6 Clinton. Do you have any proof of how Joe paid  
 7 Danny Clinton?  
 8 A. Well, evidently through PayPal; what you've  
 9 shown me.  
 10 Q. Beyond what I've shown you, do you have any  
 11 information?  
 12 A. I have no idea.  
 13 Q. Has Joe contacted you about being involved  
 14 in writing a song for his deceased husband, Travis  
 15 Maldonado?  
 16 A. No.  
 17 Q. Do you know who Travis Maldonado is?  
 18 A. Kind of, yeah.  
 19 Q. Were you aware that he has passed away?  
 20 A. Yeah.  
 21 Q. How did you become aware of that?  
 22 A. Jeff Johnson, yeah.  
 23 Q. And that's been something that Mr. Johnson  
 24 made you aware of in the last 30 days or so?  
 25 A. Correct. Right.

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1 Q. You've never met Joe Schreibvogel,  
 2 Maldonado, in person; correct?  
 3 A. Correct.  
 4 Q. You've never been -- or have you ever been  
 5 to the state of Oklahoma?  
 6 A. No.  
 7 Q. Just to be clear. You were not asked to  
 8 participate in or write a song for Travis Maldonado?  
 9 A. No.  
 10 Q. I know you testified that you've not been  
 11 paid. But with respect to any agreements for  
 12 writing songs, how was it determined what Joe was  
 13 supposed to be paying?  
 14 Was it per song that he was supposed to pay  
 15 you? Or did he just say, Once I get this reality  
 16 show up and going, I'll make it right?  
 17 A. Correct.  
 18 Q. But there was no promise of a set dollar  
 19 amount?  
 20 A. Correct.  
 21 Q. Do you know whether or not he had that same  
 22 agreement with Danny Clinton?  
 23 A. I have no idea.  
 24 Q. What about with Victor Sorisio?  
 25 A. No. He wouldn't have that with Vic. Vic

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1 wants to be paid for using his studio.  
 2 Q. Do you know, during that 2014 -- '14, '15  
 3 time frame, what studio time at Victor Sorisio's  
 4 studio cost per hour?  
 5 A. Boy, that -- he would charge --  
 6 Q. Just if you know.  
 7 A. Right. He would -- it varied. Vic would  
 8 go from 25 to 50 an hour; you know, maybe more; you  
 9 know, depending upon the client, if you've got a  
 10 good client.  
 11 Q. Fair for me to say that it would depend on  
 12 whether you were bringing in just a guy and an  
 13 acoustic guitar, versus a full setup with a drum,  
 14 and an organ, and a keyboard, and a bass, and a lead  
 15 guitar and rhythm guitar.  
 16 The more people, the more setting up mics,  
 17 the more it's going to cost; right?  
 18 A. Yeah.  
 19 Q. I mean, that's generally how studios work;  
 20 right?  
 21 A. Right. And, you know, depending on the  
 22 client.  
 23 Q. If somebody were to contact you this week  
 24 and say, I would like you to write a song about this  
 25 subject matter, is there a set way that you price

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1 your work for doing that?  
 2 A. It would depend on the client and if it  
 3 was, you know, guy next door or whatever.  
 4 Q. Sure.  
 5 A. But a corporation, no. I've got no set  
 6 price.  
 7 Q. Earlier I said Tracy McKeown. I misspoke.  
 8 It's actually Theresa McKeown, McKeown Enterprises,  
 9 LLC. Does that ring a bell at all?  
 10 A. No. Not at all.  
 11 Q. Mr. Johnson, how did -- how did you and  
 12 Mr. Clinton first meet? Mr. -- it seems weird to  
 13 say Mr. Clinton.  
 14 A. Yeah.  
 15 Q. Danny Clinton first meet?  
 16 A. I met this gal, and she -- you know, Hey,  
 17 you got to check out this singer, you know.  
 18 I told her I was looking for a singer, you  
 19 know.  
 20 And put on a CD and they -- just karaoke  
 21 singing, you know. And that's how.  
 22 Q. And do you remember what year that was?  
 23 A. (No response.)  
 24 Q. Let me ask it this way: Do you think that  
 25 was prior to 2010?

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1 A. Oh, yeah. It was prior to 2010.  
 2 Q. Was it prior to 2005?  
 3 A. It seems like it was right around there.  
 4 Q. Okay.  
 5 A. But maybe prior to that.  
 6 Q. Okay. And did you -- were you able to get  
 7 in contact with Danny Clinton?  
 8 A. Yeah.  
 9 Q. And at that time, we'll just say the 2005  
 10 range, was Danny Clinton living here locally --  
 11 A. Yeah.  
 12 Q. -- in Vancouver, Washington area?  
 13 A. Uh-huh.  
 14 Q. Is that a yes?  
 15 A. Yes. Yes.  
 16 Q. And how did you get in contact with him?  
 17 A. She knew him. You know, she bought the CD  
 18 from him. She was a fan. He was singing at some  
 19 bar in Washougal, you know, just...  
 20 Q. In where?  
 21 A. Washougal. It's a little town outside of  
 22 Vancouver.  
 23 Q. Okay. And do you remember her name, the  
 24 name of the woman that introduced you?  
 25 A. No.

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1 Q. Okay. So did you go see him playing at a  
 2 bar?  
 3 A. No. I called him and said, Hey, man, I'm a  
 4 songwriter. You got some tunes, you know, I like  
 5 your voice, do you want to get together?  
 6 Q. Okay.  
 7 A. I don't -- so I met Danny.  
 8 Q. Okay. And did you guys put a band together  
 9 at that point?  
 10 A. Me and him?  
 11 Q. Yeah, you and Danny Clinton put a band  
 12 together?  
 13 A. No. No. There was never a band.  
 14 Q. Okay.  
 15 A. No. It was just always me, and him, and  
 16 whatever studio we were using at the time.  
 17 Q. Okay. I see. So you and Danny Clinton  
 18 never had a band that played live together?  
 19 A. Right. Correct.  
 20 Q. Okay.  
 21 A. It was just trying to --  
 22 Q. I see.  
 23 A. -- play songs in movies, films.  
 24 Q. So it would be like if I went back home and  
 25 said I was going to quit practicing law and start to

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1 being a songwriter, it would be the equivalent of me  
 2 finding a local person whose voice I liked to record  
 3 the songs to get them known?  
 4 A. There you go.  
 5 Q. Got you. And that's the relationship that  
 6 you and Danny had?  
 7 A. Right.  
 8 Q. And how long did that relationship  
 9 continue?  
 10 A. Up until the numbnuts -- excuse me. Up  
 11 until Joe, you know -- up until 2014, '15.  
 12 Q. And I know you've told me this. But on the  
 13 record, do you remember -- well, tell me the last  
 14 time you can recall you and Danny having contact  
 15 with one another.  
 16 A. I just misspoke. I think it was like --  
 17 no. '14, '15.  
 18 Q. Okay.  
 19 A. It couldn't have been any later than that.  
 20 I think it was '14.  
 21 Q. And Mr. Johnson, was there -- was there  
 22 a -- for lack of a better word, a falling out where  
 23 you had a conversation with Danny Clinton and you  
 24 guys --  
 25 A. There was a definite falling out.

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1 Q. And what was that over? Was it over this,  
 2 these songs with Joe?  
 3 A. That's nobody's business.  
 4 Q. Well, let me ask you this. And I do need  
 5 an answer to this. If it had to do with something  
 6 else, then fine.  
 7 But did it have to do with these songs that  
 8 Joe was doing and having him record?  
 9 A. It had to do with a lot of things. That  
 10 was part of it.  
 11 Q. And I know you're saying that 2014 or '15  
 12 is the last time you had contact with Danny. Do you  
 13 have anywhere in your records the last -- could you  
 14 get for me the last address or contact information  
 15 you had for him?  
 16 A. I don't know. He always -- Danny moved.  
 17 He's like Zsa Zsa Gabor. He was married, like,  
 18 seven times, I believe, maybe eight. You know, he's  
 19 kind of a nomad.  
 20 Q. Well, all I'm getting at, Mr. Johnson --  
 21 A. How to track him down.  
 22 Q. That's right.  
 23 A. I don't know.  
 24 Q. Let me ask you this. The last time -- do  
 25 you still have the phone number from the last time

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1 you talked to him was?  
 2 A. No.  
 3 Q. You don't even still have a phone number?  
 4 A. No. Once I'm done with somebody, I'm done.  
 5 Q. So you deleted his phone number or threw it  
 6 away?  
 7 A. Correct.  
 8 Q. Do you have anything with the last address  
 9 you had for him?  
 10 A. No.  
 11 Q. What about the last e-mail you used for  
 12 him?  
 13 A. Nothing. Once I'm done with somebody --  
 14 you know, it's like Joe. I don't want nothing to do  
 15 with him.  
 16 Q. I know. But, I mean --  
 17 A. I'll check around, but -- you know.  
 18 Q. And all I'm asking, Mr. Johnson, is what  
 19 you might still have, either in an old e-mail box or  
 20 an old record somewhere that shows the last time you  
 21 mailed him something, what address you used; the  
 22 last time you called him, what phone number you  
 23 used; or the last time you e-mailed him, what e-mail  
 24 you used.  
 25 A. Excuse me.

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1 Q. If you would please check your records for  
 2 that?  
 3 A. I will.  
 4 Q. And I would appreciate it; all right?  
 5 A. I will. I mean, he's not a master  
 6 criminal. He's not hiding from anybody.  
 7 Q. I understand.  
 8 A. Why can't you guys find him?  
 9 Q. That's a good question.  
 10 A. Right.  
 11 Q. There's people I've lost touch with over  
 12 the years. But if I look back, somewhere I've got  
 13 my last address I had for them or something.  
 14 A. Right.  
 15 Q. And even if it's been three or four years  
 16 ago.  
 17 A. I'll look around.  
 18 Q. I guess when you and Danny were still  
 19 actively doing songs together, did you communicate  
 20 usually by phone? Or by e-mail? Or how?  
 21 A. Phone. Or he would just stop by the house.  
 22 Q. As far as you know, at least the last time  
 23 you knew for sure, was Danny living around this  
 24 Vancouver area?  
 25 A. Yes.

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1 Q. Are there any other songs that you have  
2 written for Joe relative to the subject matter of  
3 this lawsuit, or Mr. or Mrs. Baskin, or Big Cat  
4 Rescue, that have been written, but not recorded as  
5 a demo?  
6 In other words, are there any other songs  
7 out there that you know you've written, but have  
8 never been recorded as a demo or otherwise put  
9 together?  
10 A. For Joe?  
11 Q. Yes, sir.  
12 A. Absolutely not. No way.  
13 Q. I tell you what, Mr. Johnson. Can you give  
14 me about five or ten minutes to look over my notes  
15 and things, if you would?  
16 A. Sure.  
17 Q. Okay.  
18 (Recess from 12:33 p.m. to 12:51 p.m.)  
19 Q. (By Mr. Givens) All right. Let's just go  
20 back on the record for a couple of minutes.  
21 Mr. Johnson, we had a short break there.  
22 There are some things we talked about today with  
23 respect to you're going to search your records for  
24 me --  
25 A. (Witness nods head.)

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1 Q. -- to see if, in fact, there is any kind of  
2 a written agreement with Joe relating to the songs  
3 that you wrote for him; correct?  
4 A. Yes.  
5 Q. You're going to search your records and see  
6 if you, by chance, still have some last contact  
7 information for Danny Clinton; correct?  
8 A. Yes.  
9 Q. If there's something else later, after we  
10 leave here today, that you think of or remember,  
11 will you reach out to me and let me know?  
12 A. I will. I got your number.  
13 Q. Just real quick. I know you've mentioned  
14 the name Jeff Johnson a couple of times today in  
15 your deposition, and having spoken with him in the  
16 last 30 days or so.  
17 Can you just tell me what you and  
18 Mr. Johnson talked about?  
19 A. His hatred -- our mutual hatred for Joe. I  
20 didn't know the guy, all right. He just contacted  
21 me out of the blue, but...  
22 Q. Am I correct in understanding he contacted  
23 and you alerted you to some songs that you had  
24 written and Joe was using without your knowledge?  
25 A. It eventually got to that.

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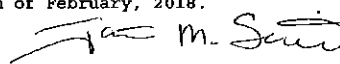
1 Q. Okay.  
2 A. He said he had a CD of Joe.  
3 And just out of curiosity, I said, Well,  
4 what's songs are on it? You know.  
5 Q. Do you have any copies of any of Joe's CDs?  
6 A. No.  
7 Q. Okay. Mr. Johnson, you will have an  
8 opportunity to read the deposition transcript and  
9 sign it. But you need to tell Ms. Schmitt if you  
10 want to read and sign, or if you want to waive your  
11 right to read and sign, and that's just your choice.  
12 Some people like to read it for accuracy to  
13 make sure.  
14 A. Are you talking about everything that's  
15 been said here today?  
16 Q. Yes. It will be put into a transcript for  
17 you.  
18 A. Oh, I trust her. She seems very competent.  
19 Q. You need to tell her if you want to waive  
20 it or read and sign it.  
21 A. Waive it. But I would like to enter --  
22 Q. You want that entered as an exhibit?  
23 A. Yes. I think it's important.  
24 Q. Okay. Do you want her to mark it and  
25 actually enter it? Because that will be attached to

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1 the transcript booklet.  
2 A. Yeah.  
3 Q. Can we make that an attachment as the  
4 witness' Exhibit 1?  
5 A. Well, it just kind of explains my memory.  
6 I had a severe stroke. Did I mention this to you  
7 already?  
8 Q. You mentioned the stroke at the end of  
9 2016.  
10 A. Right.  
11 Q. And then last week you said you had an  
12 episode on February 7th.  
13 A. Several episodes leading up to finally when  
14 I went to the emergency room. And this is what I'm  
15 diagnosed with.  
16 Q. Okay. And is that (indicating) what you'd  
17 like to attach?  
18 A. Yeah, just that.  
19 Q. That page right there (indicating)?  
20 A. Yeah. That section right there.  
21 Q. Okay. That's fine.  
22 A. I mean, I'm not looking for an excuse for  
23 my bad memory.  
24 Q. Sure.  
25 A. My mind's foggy right now. I can't help

1 it.  
2 Q. I understand.  
3 A. I haven't been to a doctor in 30 years, you  
4 know. Doctors, to me, you know -- but now I'm kind  
5 of like, you know, in a daze here, I need them.  
6 Q. I understand.  
7 A. Okay.  
8 Q. Okay.  
9 A. Well, we will conclude your deposition  
10 there, and that will be attached for the record.  
11 And then you will get a copy of the transcript in  
12 the mail from the court reporter.  
13 THE COURT REPORTER: Do you need a  
14 transcript?  
15 MR. GIVENS: Yeah.  
16 (Witness Exhibit Number 1 marked for  
17 identification.)  
18 (Signature waived.)  
19 (Deposition concluded at 12:56 p.m.)  
20  
21  
22  
23  
24  
25

1 C E R T I F I C A T E  
2  
3  
4 I, Janette M. Schmitt, a Certified Court  
5 Reporter for Washington, pursuant to RCW 5.28.010  
6 authorized to administer oaths and affirmations in  
7 and for the State of Washington, do hereby certify  
8 that, VINCE JOHNSON personally appeared before me at  
9 the time and place set forth in the caption hereof;  
10 that at said time and place I reported in Stenotype  
11 all testimony adduced and other oral proceedings had  
12 in the foregoing matter; that thereafter my notes  
13 were reduced to typewriting under my direction  
14 pursuant to Washington Administrative Code  
15 308-14-135, the transcript preparation format  
16 guideline; and that the foregoing transcript, pages  
17 1 to 87, both inclusive, constitutes a full, true  
18 and accurate record of all such testimony adduced  
19 and oral proceedings had, and of the whole thereof.  
20 Witness my hand and CCR stamp at Vancouver,  
21 Washington, this 28th of February, 2018.  
22  
23  
24  
25

  
\_\_\_\_\_  
JANETTE M. SCHMITT  
Certified Court Reporter  
Certificate No. 2252  
Commission Expires: 7/30/2018





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