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APPEARANCES

FOR THE PLAINTIFF:

MR. JOHN PHILLIPS

Phillips & Hunt

212 North Laura Street

Jacksonville, FL 32202

Jmp@floridajustice.com

ALSO PRESENT:

Mr. Rick Majewski, videographer

Via Zoom, Ms. Catherine Halsema, Mr. John

Lawless

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PROCEEDINGS

1
2 THE VIDEOGRAPHER: Good morning, we are going
3 on the record at 10:59 a.m. on May 17th, 2023.

4 Please note that microphones are sensitive and
5 may pick up whispering and private conversations. Please
6 mute your phones at this time.

7 Audio and video recording will continue to take
8 place unless all parties agree to go off the record.

9 This is the Media Unit 1 of the video-recorded
10 deposition of Vince Johnson in the matter of Joseph
11 Maldonado versus BMG Rights Management, LLC, et al.,
12 filed in the United States District Court for the
13 Northern District of Florida, Pensacola Division, Case
14 No. 3:22-cv-18229-TKW-ZCB. The location of this
15 deposition is 1220 Main Street, Suite 400, Vancouver,
16 Washington, 98660.

17 My name is Rick Majewski and I'm representing
18 Veritext Court Reporting and I'm the videographer. The
19 court reporter is Teresa Rider from the firm Veritext
20 Court Reporting.

21 I am not authorized to administer oaths. I am
22 not related to any party in this action nor am I
23 financially interested in the outcome. If there are any
24 objections to proceeding, please state them at the time
25 of your appearances.

1 Counsel and all present, including remotely,
2 will now state their appearances and affiliations
3 beginning with the noticing attorney.

4 MR. PHILLIPS: John Phillips on behalf of
5 Joseph Maldonado.

6 THE VIDEOGRAPHER: Will the court reporter
7 please swear in the witness and then counsel may proceed.

8 VINCE JOHNSON,
9 called as a witness in behalf of the Plaintiff, having
10 been duly sworn, was examined and testified as follows:

11

12 EXAMINATION

13 BY MR. PHILLIPS:

14 Q. Would you please state your name for the
15 record.

16 A. Vince Johnson.

17 Q. Mr. Johnson, my name is John Phillips. Good to
18 meet you. Sorry under these circumstances.

19 Let me go through a few of the ground rules for
20 purposes of today. One, this isn't a test of your
21 endurance or any type of -- you know, my intention is to
22 not have this be contentious or dramatic, right?

23 So if you need to take a break for any reason
24 or if you and I don't see eye-to-eye on a question and
25 answer, you know, let's take a break and come back and

1 get through this. My goal is to get through this, you
2 know, as soon as possible.

3 A few things related to a deposition. If an
4 answer is yes or no, try to answer with a yes or no,
5 rather than a head nod or uh-huh or huh-uh, because it's
6 not as clear on the record.

7 And if you answer a question -- if you don't
8 understand a question, please let me know because you're
9 sworn to tell the truth and the last thing I want you to
10 do is answer a question that you didn't understand and
11 then we're trying to figure it out later; is that fair?

12 A. Yep.

13 Q. Okay. I'm going to start off with a little bit
14 of background.

15 Where are you from?

16 A. I was born in Portland. Live here in
17 Vancouver.

18 Q. Okay. We're in Vancouver, Washington. Is the
19 Portland/Vancouver area where you've lived throughout
20 your career?

21 A. Here and Phoenix and Nashville.

22 Q. What is your career?

23 A. Musician, songwriter.

24 Q. How long have you been a songwriter?

25 A. Since Hitler was a corporal. A long time.

1 Q. Since Hitler was a corporal. Talking about
2 Adolph Hitler?

3 A. Yeah.

4 Q. And do you have any other -- related to Joseph
5 Maldonado, other than singer or songwriter, have you
6 provided him any other services?

7 A. You're talking about Joe Exotic, correct?

8 Q. Correct.

9 A. No.

10 Q. How did you come to meet or interact with Joe
11 Exotic?

12 A. He had an ad on Craig's List seeking crew
13 members and so I emailed him. He needed a theme song for
14 your park. I can write you one.

15 Q. So he had an ad -- let me clarify. He had an
16 ad on Craig's List and you were searching national
17 listings --

18 A. I was scouring -- it was in Oklahoma, right? I
19 was scouring work looking for work and I popped him.

20 Q. Have you ever been in the same room as Joe
21 Exotic?

22 A. No.

23 Q. And I assume by that you've never visited his
24 park in Oklahoma.

25 A. No.

1 Q. And when you responded to the ad, was the ad
2 seeking songwriters?

3 A. No.

4 Q. What was it seeking?

5 A. I don't know. Crew members for the videos to
6 film his animals, sound, perhaps cameraman. I don't
7 remember.

8 Q. He was filming some sort of reality show, and
9 was it crew for that, do you recall?

10 A. He didn't specify.

11 Q. Okay. But you said, hey -- were you responding
12 to try to get a job as the crew or did you independently
13 pitch, hey, let me do a song for you?

14 A. Correct.

15 Q. The latter?

16 A. Yeah.

17 Q. And how did that go? What happened next?

18 A. He got right back to me, said, great.

19 Q. Okay. And what happened next?

20 A. Obviously, I asked him what he wanted the song
21 about, and he gave me his spiel about Peter being mean to
22 him, et cetera. And Tigers. He gave me the details of
23 what he wanted me to, perhaps, come up with a song about.

24 Q. Right. And for other clients of yours, you
25 know, how does that creative process work? I assume

1 you've written -- I know for a fact you've written songs
2 for other musicians, correct?

3 A. Other people have done my songs.

4 Q. Right.

5 A. Specifically to writing a song for, you know,
6 Joe Blow, an individual, I've only done that three times.
7 Like, they had a problem with Meineke muffler. I was
8 hired me to write a song. I wrote the Meineke song,
9 clever guy. But anyways, it was paid the next day.

10 And then -- oh, for a movie, Trailer Park
11 Zombies or some bullshit.

12 Q. That's okay.

13 A. Some low budget movie. He gave me the outline.

14 So with exotic, it was kind of like, to me, an
15 exercise to see if I can do it, because I'm pretty good
16 at that, I think.

17 Q. That's what I'm trying to understand.

18 Certainly there would be creativity that you
19 come up with on your own and pitch to somebody or then
20 kind of collaborative idea is, hey, I've got a problem
21 with Meineke mufflers.

22 A. Yeah, two totally different things. If I write
23 a song on my own, I might write about that chair. But if
24 you tell me you have a specific theme for a specific
25 subject matter, you know...

1 Q. Is it fair that's essentially what Joe Exotic
2 had, he wanted songs about tigers and Carole and his
3 life --

4 A. Yes.

5 Q. -- similar to the Meineke muffler?

6 A. Correct.

7 Q. Okay. Related to your deposition, we sent you
8 this document is entitled Amended Notice of Taking
9 Videotape Deposition of Vince Johnson. Page 4 had some
10 documents.

11 Did you bring any documents with you today?

12 A. I don't have any documents.

13 Q. Okay. Did you keep a copy of any of the
14 contracts?

15 A. No.

16 Q. Did you keep a copy of any of the emails?

17 A. No.

18 Q. Do you have access to the email account that
19 you used back then?

20 A. Sure. Same one that I have now. But, see,
21 you're asking for this stuff. This was back in 2020. I
22 never heard of you until eight months ago and you didn't
23 ask for this until three months ago or two months ago, if
24 even that.

25 Q. Okay.

1 A. So to think I have emails from 2020 is -- I
2 don't.

3 Q. Well, I'll even go further back.
4 Some of the emails I'm looking for to see if
5 you have copies of are from May of 2013.

6 A. No.

7 Q. Okay. Is there a folder in your email or like
8 your sent folder that would have emails dating that far
9 back?

10 A. I hired a guy, George Stevens, to try to
11 retrieve all that information. He couldn't do it.

12 Q. Okay. Let me -- in some of the questions I'm
13 going to ask, of course, are going to be a little weirder
14 and wilder than others, but let me get through them. We
15 talked about that you haven't met Joe Exotic in person.
16 Okay?

17 Have you ever met Joe Lowe in person?

18 A. No.

19 Q. James Garretson?

20 A. No.

21 Q. Carole Baskin?

22 A. No.

23 Q. The Tiger Team producers?

24 A. No.

25 Q. Okay. Did you have any role in the -- now I'm

1 going to separate this, and I'll tell you ahead of time
2 what I'm separating. I'm talking about Tiger King the
3 production, and then Tiger King the production that
4 licensed music, right? In the production, I mean
5 filming.

6 Did you have any involvement where or were you
7 filmed or interviewed by Tiger King?

8 A. No.

9 Q. When did you first have contact with somebody
10 about the licensing of music in the documentary Tiger
11 King?

12 A. 2018, maybe.

13 Q. Okay.

14 A. A producer contacted me and asked for, you
15 know, wanted to license some songs. I believe it was
16 2018.

17 Q. Were you compensated for that?

18 A. Yes.

19 Q. How much?

20 A. I plead the Fifth. I've conferred with my
21 attorney and --

22 Q. Now, the Fifth Amendment is what people take
23 under the Bill of Rights when they feel like they are
24 going to incriminate themselves and possibly expose
25 themselves to criminal charges, so respectfully, I don't

1 think the Fifth Amendment would be applicable here. But
2 I understand if you have a contract and you feel that
3 there's a nondisclosure agreement in there.

4 A. I think it is applicable. The court will
5 recognize my pleading the Fifth. I don't think what I
6 was paid or wasn't paid is, you know, your business.

7 Q. Okay. Well, that's an objection to relevance,
8 and we'll handle that and come back to this, then.

9 So how many emails back and forth did you have
10 with Joe Exotic?

11 A. 300, maybe.

12 Q. Okay. How many phone calls?

13 A. I believe four, three or four.

14 Q. Okay. Do you recall anything specific from
15 those phone calls?

16 A. Not really, no. Oh, other than him saying,
17 great work, keep it up, blah, blah, blah.

18 Q. Okay. So I'm going to start my first exhibit,
19 and this is going to be Plaintiff's Exhibit 1. And the
20 court reporter will put a little sticker on it, but this
21 is a copy for you to look at, and I'm going to go kind of
22 page by page.

23 My understanding of what -- well, what this is
24 is through assembling Joe's email, this is Joe's email,
25 your email back to Joe, as I understand it to be, and

1 then, you know, on the left, you'll see dates. At some
2 point, there's -- things other than email that try to put
3 this whole thing in chronological order.

4 A. Okay. Are these the entire emails?

5 Q. This is my understanding these are the entire
6 emails. But I got to start off saying I'm obviously
7 missing -- I think I'm obviously missing some, and I
8 think I'm missing at least the first one, because we
9 start -- it seems to me we start mid-conversation. If
10 you look on the first page, May 24th, 2013, regarding I
11 Saw a Tiger, so clearly there was an email that is
12 missing entitled I Saw a Tiger?

13 A. Yeah, there may be quite a few missing.

14 Q. Yeah, if we have 300, I don't have 300 here.
15 But let's do our best to kind of run through, you know --
16 run through these as quickly as we can.

17 So going back to May 24th, 2013, this says,
18 from Joe Exotic to Vince Johnson. You are freaking
19 awesome. I will get with you after my show and get your
20 PayPal again.

21 Is that referring to the -- him getting you to
22 write I Saw a Tiger, do you recall that?

23 A. I would assume, yes.

24 Q. When you said you were kind of pitching a song
25 for Joe or Joe's show, is the first show, I Saw a Tiger?

1 A. Yes. And it wasn't for his show. He didn't
2 have a show. He specifically told me to play at his gift
3 shop.

4 Q. Okay. Okay. And May 24th, I have a response,
5 is VinceJohnson@q.com, is that your email address?

6 A. Yes.

7 Q. And I you never know what people will like, and
8 you were a bit nervous, glad you liked it.

9 Do you recall that?

10 A. I don't recall, but it sounds like what I might
11 say.

12 Q. Okay. And at this point, you and Joe -- is it
13 fair to say you and Joe were at the early stages of a
14 relationship where he was -- he was purchasing your
15 services?

16 A. Correct.

17 Q. Okay. And those services were songwriting?

18 A. Correct.

19 Q. Okay.

20 A. Should I wait until you ask a question?

21 Q. If you need to clarify, you're welcome to
22 clarify.

23 A. The very first song, I Saw a Tiger, okay, when
24 I talked to Joe on the phone for the very first song, he
25 told me he wanted to use the song -- he had a gift shop

1 at his zoo and he was going to play it and people walking
2 through, they can hear it and they can buy stuff out of
3 his gift shop.

4 He didn't say anything, not word one, about him
5 pretending to perform the song, let alone write it.

6 Q. Okay. Okay.

7 A. I didn't learn that until a couple of months
8 later --

9 Q. Okay.

10 A. -- when I just happened to be on YouTube and I
11 typed in Joe, what's this dude up to? And there he was
12 up on that pickup pretending he was the singer and the
13 songwriter.

14 Q. We'll get into that in the emails.

15 A. Okay.

16 Q. We'll get through that. If there's anything
17 you feel was left out, we'll have a collaborative process
18 through this, because I just want to know the truth.

19 A. Okay. I was duped right from the beginning.

20 Q. You certainly -- there's some emails in here
21 that you address it, and you address it also -- because
22 Danny was pissed?

23 A. To say the least.

24 Q. So like I said, we'll get through it.

25 A. Okay.

1 Q. So moving for May 31st, page 1, Joe said: This
2 is the song I opened my magic show with about my brother.
3 You can change it around, shorten it, to get the point
4 across and make it a sad country song. See what you can
5 do. Don't use the ending message. That is different.

6 Now, was that the GW and Me song that he's
7 talking about there or My First Love?

8 A. About his brother, it has to be about GW.

9 Q. Okay. And do you recall what he submitted to
10 you to change it around?

11 A. No, because -- it should be somewhere in here
12 or on the phone, I told him that I'll do my thing, you
13 know. I'm not going to be changing, like, if he didn't
14 like -- which he never did. He always loved the songs.

15 Q. Right.

16 A. Well, what was your question? I'm sorry.

17 Q. So it looks like he sent you some written
18 materials.

19 A. He emailed me about his brother, GW, who died.

20 Q. Right.

21 A. He wanted me to write a song about it --

22 Q. Okay.

23 A. -- which I caught him in an interview saying he
24 wrote the song.

25 Q. We're going to get into all that.

1 A. Okay.

2 Q. May 31st, I have what we'll mark as Plaintiff's
3 2.

4 (Deposition Exhibit Nos. 1 and 2 were marked
5 for identification.)

6 BY MR. PHILLIPS:

7 Q. So 2, which says Exhibit 1 at the bottom, we're
8 going to go by the yellow sticky, says -- is dated May
9 31st. It says 113, my understanding was 2013. That
10 there was an agreement between Joe Exotic and Vince
11 Johnson -- Vince Johnson, Clinton Johnson Band.

12 Who is The Clinton Johnson Band?

13 A. That's the singer, Danny. Danny has passed
14 away.

15 Q. Right. And the producer has produced a song
16 entitled I Saw a Tiger, says original composition, that
17 was your composition?

18 A. Uh-huh.

19 Q. And was solely composed, produced and recorded
20 by him?

21 A. And --

22 Q. And then the next line: He relinquishes all
23 copyrights, publishing rights and all other rights of
24 said song to include any and all uses to the company.

25 What does that mean?

1 A. I'm sorry. Say that again.

2 Q. Paragraph 2, line 2: He relinquishes all
3 copyrights, publishing rights and all other related
4 rights of said song to include any and all uses to the
5 company.

6 What does that mean?

7 A. Well, see, you're getting ahead of yourself.
8 This was only after the fact. He came up with this after
9 he had made that video and was using the song without my
10 permission.

11 Q. Okay. Okay. So if the date's wrong, then the
12 date's wrong?

13 A. Oh, it's definitely wrong.

14 Q. Okay. But did you sign it?

15 A. I did.

16 Q. Okay. And the company is referenced as Joe
17 Schreibvogel, aka Joe Exotic.

18 So based upon this contract, Vince Johnson and
19 The Clint Johnson Band, the producer, relinquishes all
20 copyrights, publishing rights and all other related
21 rights of said song, which was I Saw a Tiger, to the
22 company, which was Joe Schreibvogel, aka Joe Exotic,
23 true?

24 A. Yes, but again, this was after he had made the
25 video and already claiming that he wrote it.

1 Q. Okay.

2 A. This was -- okay.

3 Q. Okay. And we're going to get into that,
4 because there was more money that was ultimately charged
5 for him to take credit.

6 A. No.

7 Q. Okay. Next line of the second paragraph: All
8 rights of the song I Saw a Tiger will rest with the
9 company in perpetuity.

10 Do you know what in perpetuity means?

11 A. I do.

12 Q. Forever, right?

13 A. Yeah.

14 Q. In all jurisdictions and through all process
15 once this agreement is executed.

16 What's your -- do you contend that this
17 contract, which you're holding in your hand, is invalid?

18 A. I do because it's after the fact. I had no
19 intention of selling him the songs. He stole right from
20 the beginning. It's true. I signed it. No question
21 about that. But here's the thing, he wanted his song,
22 like I told you, to play at his theme park, shopping
23 thing, you know, he sells doodads and whatnots. He told
24 me that's what he wanted, this very first song, I Saw a
25 Tiger for.

1 And then like I say, a while later, I was
2 curious one night. I got on YouTube and there he was up
3 on a pickup truck lip-syncing it, taking credit, like
4 he's the singer/songwriter.

5 Q. Okay. And I get the argument to use the
6 expression cart before the horse, right? I get Joe was
7 holding this out or lip-syncing, to use your words, this
8 song, and you saw it and said, hey, that's not the deal.

9 A. It wasn't. Yeah, exactly.

10 Q. But then you signed the deal.

11 A. After the fact.

12 Q. Okay. Have you -- is there another contract
13 after this that changes this transfer of music rights
14 agreement? In other words, related to I Saw a Tiger, did
15 you have any other contracts?

16 A. No no written contracts. Like I say, it was
17 verbal -- our first verbal contract, he was going to play
18 I Saw a Tiger, which I wrote for him, strictly in his
19 theme park. You see what I'm saying?

20 Q. Uh-huh.

21 A. That's what he told me he wanted the song for.
22 He said nothing about lip-syncing and acting like he
23 wrote it and sang it.

24 Q. All right. But whenever you signed this --

25 A. After the fact.

1 Q. -- after the fact, whenever you signed this you
2 relinquished all copyrights, publishing rights and
3 related right of the song to Joe.

4 A. According to this, yes. And I signed it, I
5 did, yes.

6 Q. And you gave it to him forever, no matter what.

7 A. Right. That was after the fact.

8 Q. Right.

9 A. After he had already written me off. After he
10 was already singing it as a performer. But, yes, I did
11 sign it.

12 Q. If you contend you were ripped off, why would
13 you then sign an agreement saying, okay, you can have
14 this forever?

15 A. Because he was paying me, obviously.

16 Q. Okay. So you got consideration. You got
17 payment for this transfer of music rights agreement.

18 A. Yeah. Not what he promised, yeah, but I did
19 get some payment.

20 Q. I think we get into that in an email. But some
21 were clear, you do contend, and I think it makes sense
22 that the day 5-31-113 is wrong.

23 A. Yes, yes.

24 Q. Going back to Exhibit 1, the chronology,
25 there's an item in degree. And it appears on June 1st,

1 2013, Joe says: I'll transfer two hundred dollars --
2 I'll transfer 200 on Monday, so I don't have to look
3 through tons of emails. What was your PayPal again?

4 What was the \$200 for?

5 A. Okay. Run that by me, again.

6 Q. Looking at the June 1st email. It's gray in
7 yours; it's green in mine. It looks like Joe transferred
8 \$200.

9 Do you recall what that was for?

10 A. Oh, it would have to be for music, for songs.

11 Q. How much originally were you charging Joe per
12 song -- per song written for him?

13 A. That first one, I just -- it was kind of an
14 exercise to me. Like I had done the Meineke song. I
15 wanted to see if someone gave me a specific subject to
16 try. It was only 450 bucks, that first song.

17 Q. Okay. And what I -- I'm going to do it this
18 way. The email address, so I'm not saying it out loud or
19 it will print on the record, the email address on June 1,
20 2013, at the bottom, starting with the word real is that
21 your email address?

22 A. No.

23 Q. Whose email address is that?

24 A. I don't know.

25 Q. Have you ever had, since it's not yours,

1 realmensingloudandstrong@Gmail.com?

2 A. Danny. That's Danny.

3 Q. Okay. That's Danny's email address?

4 A. Correct. Yeah.

5 Q. Did you share a PayPal with Danny?

6 A. No.

7 Q. Was Danny -- how did -- at this point, why was
8 Joe told to pay Danny instead of you?

9 A. Danny was the singer.

10 Q. Okay. June 2nd, looks like Joe emails you
11 about recording in a studio.

12 Is that when Danny went in and recorded one of
13 the songs?

14 A. Sure, I guess.

15 Q. What studio would Danny use?

16 A. Various studios around, garage studios.

17 Q. Was Danny local to here or was he somewhere
18 else?

19 A. No. No, Danny is local.

20 Q. Okay.

21 A. I forgot my glasses. I brought sunglasses.

22 Q. June 12th, 2013, I believe there's an email
23 from Vince Johnson to Joe Exotic: Hi, Joe, just sent you
24 GW and Me, I hope you like it.

25 So when you'd send Joe a song, would you send

1 him the written text or would you send him --

2 A. No, I never sent him the lyrics. You take what
3 I -- you give me the idea; you like it or you don't.

4 Q. Okay. And Joe responded: Got it. What's your
5 PayPal again?

6 So he needed to pay you for that one.

7 A. Right.

8 Q. And: trying to put my thoughts together for a
9 third song. Hope I am not being a pain in butt, but
10 you're awesome.

11 So Joe was obviously happy with your services
12 and went from one song to two songs to three songs?

13 A. Uh-huh.

14 Q. That's a yes?

15 A. Yes.

16 Q. You gave me one of those no-no uh-huhs.

17 A. Yes, sir.

18 Q. That's fair. And then June 12th Joe says: Got
19 some ideas of how to turn it into a music video, so you
20 up to another one?

21 Do you recall that email?

22 A. Where are we at?

23 Q. June 12. It's the one -- yeah, it's that one,
24 top of the page.

25 A. Okay. And your question?

1 Q. Do you recall Joe mentioning that he has some
2 ideas of how to turn it into a music video?

3 A. He's turned them all into videos, yeah.
4 Whatever.

5 Q. Okay. But you knew as of June 12 that Joe
6 intended to turn these songs into music videos.

7 A. Right.

8 Q. Then June 14th, I think he's giving you
9 information about Terry Thompson and the Zanesville stuff
10 and asked for a song.

11 A. I don't have my damn glasses. Is that the one
12 at the bottom?

13 Q. Yes, sir. And if anything I need to read, I
14 can read. He talks about his friend in Ohio.

15 A. Yeah, could you please read it?

16 Q. Yeah. Sure. It's very small: Vince, one more
17 sad song, and I promise the rest will be more positive.
18 Take you time on this one, if you have to. I'm putting a
19 couple of links for you to read. My friend in Ohio, I
20 swear he was killed and did not do this himself or his
21 animals. The animal rights people set this whole thing
22 up to gain control of the exotic animal industry and pass
23 the laws they want. I still believe he would have not
24 let the animals out to be killed. And why would he cut
25 cages there when he had the key? Let me know if you

1 think this is too much. I would like to have a song that
2 would raise the question and clear this man's name to
3 some point or at least make people think.

4 And then he gave you two links.

5 A. Yeah. Okay.

6 Q. Do you recall writing a song about --

7 A. Terry Thompson -- yeah, I remember clicking on
8 those links and reading up.

9 Q. Which one was it? What was the name of it?

10 A. I don't remember my own damn songs.

11 Q. Was that My First Love?

12 A. No.

13 Q. The song says Pretty Woman Lover. I'll show it
14 to you in a second.

15 A. That's pathetic. I can't remember my own damn
16 songs. I have medical issues that stem from my brain.
17 That's embarrassing.

18 Q. We can come back to it.

19 A. I can sing the song, but I can't remember the
20 name.

21 Q. You responded: I remember this story -- June
22 14th, the top of the next page: I don't care for that
23 PETA bunch and others like them to begin with. I'll come
24 up with something.

25 A. They strike me as single-minded radical nuts.

1 Q. Right.

2 A. You, me and a possum could be laying on the
3 ground injured and they would step over us to help the
4 possum.

5 Yeah, okay. Which is true.

6 Q. I think it is true, but that's neither here nor
7 there.

8 And June 14 Joe says: Some other small ones,
9 I'll send you the first 200 tonight.

10 And then it says: If you can come up with
11 similar music as I Saw a Tiger, OMG -- meaning, oh, my
12 God -- that was so awesome. GW and Me was hard to hear,
13 cried every time. You're awesome. Okay?

14 June 14th, 2013, it's the one that looks like
15 this. I skipped a couple of pages. I read all I could
16 on Terry and the situation, and the song just came. I
17 put some venom into it. I think it sounds pretty cool.
18 I'll get the music done next week.

19 So it looks like from that email you had
20 written the Terry Thompson song and sent it to Joe and he
21 loved it.

22 A. Evidently.

23 Q. And the next one is a little confusing to me,
24 because I want to understand the context. Joe says:
25 You're the man -- which is a compliment. Thank you.

1 It says: His poor wife has been through hell
2 with the media and all and I've been basically all she
3 has as a voice. I want to surprise her with a music
4 video in honor of Terry.

5 I assume that's just referring to Joe's
6 relationship with Terry Thompson's wife.

7 A. I would assume so, too, I don't know.

8 Q. Then it looks like June 16th is when we get
9 into the YouTube discovery, because the bottom of that
10 email dated June 16th, 2013, at 7:15 p.m. from you to
11 Joe: Hey, Joe, I just got a call from my singer.

12 I assume that's referring to Danny.

13 A. Uh-huh.

14 Q. He was pretty hot, LOL. You need to understand
15 the ego of singers, they're huge. Anyways, he came
16 across I Saw a Tiger on YouTube.

17 A. Which I told him about.

18 Q. And wants to know about the credits: You are
19 going to credit the Clinton Johnson Band, correct?
20 Thanks, Vince.

21 A. Did I put credited?

22 Q. I'm skipping, you know, kind of typos, for
23 purposes of this. I'm not picking on you about typos.

24 Then Joe responds: Yeah, the guy who put the
25 credits on didn't know your name and has been out of town

1 and he's going to remake it when he gets back out of
2 town. For now I'll do the credit in the description of
3 the YouTube. I know how to do that.

4 And then you respond: Great --

5 A. Which was a lie. Joe was lying.

6 Q. What was the lie?

7 A. He done that on purpose.

8 Q. Okay.

9 A. You know, he took credit for the song on
10 purpose. There was no trying to blame it on somebody
11 else.

12 Q. Okay.

13 A. I talked to Joe on the phone about that.

14 Q. Great. You say: Great, if you can add that,
15 we're good to go.

16 And then we get into another small one,
17 unfortunately. June 16th, 2013: Vince, just called my
18 producers of the show and that does my stuff here. Seems
19 now we are in a pissing war. This is the second email me
20 and you had.

21 And it gets even smaller: Hi, Joe. Well, if
22 they're songs I already have recorded, six new ones and
23 the 15 on the MySpace, \$100 per song to write and record
24 something specific, 250 per song. Thanks, Vince.

25 And then it says: The producer, JT, had that

1 contract you all sent, so we could do it and promote the
2 song to save the tigers --

3 A. I need to read this.

4 Q. Okay. Where are your glasses?

5 A. Home.

6 Q. How far away?

7 A. Eight miles. Is there a Dollar Store around
8 here?

9 Q. I don't know.

10 A. Hi-School Pharmacy --

11 Q. We'll go off the record.

12 THE VIDEOGRAPHER: The time is 11:42 and we are
13 off the record.

14 (Off the record.)

15 THE VIDEOGRAPHER: The time is 11:53 a.m. and
16 we are back on the record.

17 BY MR. PHILLIPS:

18 Q. I think the -- I think if we blow this one up
19 -- this one I've got to go into detail. I want him to be
20 able to see it.

21 So if we could go back off and just blow this
22 one page up or I can give you the small ones -- let's
23 just go off.

24 THE VIDEOGRAPHER: The time is 11:54 a.m. and
25 we are off the record.

1 (Off the record.)

2 THE VIDEOGRAPHER: The time is 12:07 p.m. and
3 we are back on the record.

4 BY MR. PHILLIPS:

5 Q. Okay. Mr. Johnson, where we left was a small
6 print problem and I think the attempted solution is to
7 magnify through copying some of these harder to read
8 emails.

9 The one that I'm last referring to is June
10 16th. It looks like this. Did we not get that one?
11 June 17th. June 16th. Here we go. June 16th. June
12 15th -- oh, wait. I'm in '14. June 16th, '13. For some
13 reason I think we missed the one that we need.

14 A. May not have handed it to him. I apologize.
15 Are you talking about this one?

16 Q. Yes. Can we get one more?

17 THE VIDEOGRAPHER: The time is 12:09 and we are
18 off the record.

19 (Off the record.)

20 THE VIDEOGRAPHER: The time is 12:12 p.m. and
21 we are back on the record.

22 BY MR. PHILLIPS:

23 Q. Okay. Mr. Johnson, I think now we have a large
24 version of the June 16th emails.

25 Do you have one that you can read?

1 A. I do.

2 Q. I want to give you time to read it as needed.

3 Let me know when you're done.

4 A. What was your question?

5 Q. Fair enough. Content that I want to ask about
6 is some of the stuff that's in the second paragraph. Joe
7 references going online and posting bad comments on my
8 YouTube is not cool.

9 After you or Danny discovered that I saw a
10 Tiger was a video on YouTube, did one of you post
11 comments to the YouTube video?

12 A. No. I believe that was just -- that's what we
13 would do.

14 Q. You believe that's what you would do?

15 A. I believe that was a threat that's what could
16 happen, yeah.

17 Q. And then: I can sing and have access to a
18 studio in Dallas to record over if that needs to be done.

19 Is that Joe saying that he can just record over
20 Vince's voice?

21 A. Danny's voice.

22 Q. Sorry. Sorry, Danny's voice.

23 A. Who knows what he's thinking there, which he
24 couldn't.

25 Q. Well, he has the ability to sing, some might

1 not consider it as esthetically pleasing as Danny, fair?
2 Anybody can sing, they just might suck at it.

3 A. Yeah. That's an idle threat on his part.

4 Q. The email from Joe ends that he doesn't want
5 bad blood between us, correct?

6 A. Correct.

7 Q. And then we go to June 17th, the one that
8 starts: Hey, Joe. Danny just called me.

9 A. Okay.

10 Q. Got that?

11 A. Yeah.

12 Q. So June 17th, 1:56:29 p.m., you emailed Joe and
13 said: Hey, Joe. Danny just called and says he wants
14 \$2,000 a song to sell you all rights --

15 A. Wait a minute. You're on June 17th?

16 Q. June 17th. That's a different one. I don't
17 know if this was one that was blown up or not. There's a
18 lot of June 17.

19 Do you have the page before that, June 16?
20 June 16. I got it. All right?

21 Did I give you the right one? Hold on. No, I
22 didn't. June 17th, Danny just called. All right. I'll
23 refer you to this one, right there.

24 A. Okay.

25 Q. I'll read this into the record: Hey, Joe.

1 Danny just called me and he says he wants \$2,000 a song
2 to sell you all rights without credits, meaning you can
3 say you wrote the song, sang it, whatever. Please don't
4 be mad at me. I'm just telling you what the man wants.
5 It's funny you should mention Toby Keith. I had a
6 manager for a minute -- probably, I had a similar
7 manager.

8 A. Yeah.

9 Q. But am I reading that correctly that after you
10 or Danny saw the YouTube, you went back to Joe and told
11 him he could have all rights to the songs without the
12 need for credits and he could say he wrote or sang them
13 for \$2,000 a song?

14 A. Well, I don't know. I mean, there may be
15 something missing here.

16 And keep in mind -- this is obviously what has
17 been said, but this was after the fact that he had
18 already, from the very beginning song, I Saw a Tiger, he
19 ripped me off, tried to.

20 Q. Okay.

21 A. But, yeah, if I said this, I said it.

22 Q. Okay. And that's the order that's important
23 here, right, so you felt like Joe did you wrong?

24 A. He did.

25 Q. You addressed it with him?

1 A. Yes.

2 Q. And then you said, look, to make this right,
3 you pay me \$2,000 a song?

4 A. Something like that.

5 Q. And then you signed a contract that said, all
6 right, you have the rights to these songs after Joe paid
7 you?

8 A. Yes and no. Again, I keep poking on this, that
9 was only after he had ripped me off on I Saw a Tiger. He
10 was supposed to just play that at his trinket store. He
11 wasn't supposed to take credit for it.

12 So in order to -- I like writing songs.

13 Q. Yeah.

14 A. Sure, man, send me whatever. I'll sign it, you
15 know. So, yeah, I guess, you know.

16 Q. But my point is, yeah, you keep referencing
17 that Joe did something wrong and didn't use the song as
18 you thought he would.

19 A. Right, the very first song.

20 Q. And then you caught him?

21 A. Right.

22 Q. And you reached another deal where you guys got
23 paid more to get rid of the rights to that song.

24 A. Correct.

25 Q. But you still think that you have the rights to

1 that song, even though you sold them?

2 A. Yeah, because he didn't -- I hope it's in here.
3 He didn't honor this. Are there parts in here about him
4 going to pay \$7,000 a song? Is there parts in here that
5 says he's got -- going to have a reality show on the
6 Animal Planet? Are there parts in here that he promises,
7 oh, I'm good for blah, blah, blah. I'll make it good for
8 you?

9 Q. Right. And we're going to get into some of
10 that about other songs, but what I'm trying to understand
11 is we have a deal and we have a signed contract. And my
12 understanding is he paid the \$2,000 for I Saw a Tiger.

13 Is any of that wrong? You had a signed
14 contract and he paid the \$2,000 for that song?

15 A. Right. But that was after the fact that he
16 stole it. That was after the fact he lip-sync'd and
17 pretended it was his.

18 Q. Right. And I get that, but if --

19 A. I signed the contract. There's no doubt about
20 that.

21 Q. But if I take your glasses when you're in the
22 bathroom and you walk in here and say, where are my
23 glasses? And the court reporter tells you, John took
24 your glasses. All right? You can at that point call the
25 police because I took your glasses or you can address it

1 with me.

2 And if you address it with me -- and if you
3 address it with me and I said, look, I thought they were
4 my glasses. Let me give you \$500 for your glasses, and
5 you say, okay. Who owns those glasses?

6 A. I see what you're saying, but you shouldn't
7 have stolen my glasses to begin with, should you?

8 Q. Correct, but does that change the fact that if
9 I paid you \$500 for those glasses, they're my glasses?

10 A. In that scenario, you are correct.

11 But if you said I'll give you 500 for those
12 glasses then I'll pay you 500 more down the road then,
13 you know. True, you paid me \$500 for the glasses, but
14 where's the other 500 you said you were going to pay me?

15 Q. And I know there's money, that you guys get
16 into a money argument about other songs.

17 Is that what you're talking about?

18 A. Yes. And about this song.

19 Q. Okay. Okay.

20 All right. Going to the bottom of that same
21 page, the June 17, 2013 at 11:52 a.m.: Vince, we just
22 got over all these tornadoes and floods here, kind of
23 strapped, see if he will cut me a break on this one and
24 take \$1,500, which I have in PayPal right now. The zoo
25 rescue business sucks now, if you know what I mean. It

1 goes from bad weather to 100 degrees in the same week.

2 So is that Joe saying, all right, you offered
3 \$2,000 to sell all rights, but let me lower that price to
4 \$1,500?

5 A. Evidently.

6 Q. All right. And then the next page: Hey, Joe.
7 I just talked to him --

8 A. All right. Hold on.

9 Q. Got that?

10 A. Yeah.

11 Q. Hey, Joe, I just talked to him.

12 Is that referring to Danny?

13 A. I would assume.

14 Q. Deal. You can have JT or whoever write
15 something up saying whatever you like and I'll have him
16 sign it. On the new song I will go in in a day or two,
17 this stuff is throwing me off and get music done.

18 And then the next email from Joe to you:
19 That's cool, no hurry, I will send you over something.
20 Sorry we got stuck in the middle of egos, but could not
21 expect anything less. I will never tell anyone I sang
22 that, as I said, let them guess, makes it a lot funnier
23 than giving them an answer either way. Okay?

24 A. Did you hear that?

25 Q. Just wait. It changes.

1 A. I never told anybody I would sing that. From
2 the get-go, he acted like he was a performer.

3 Q. You sold him all rights.

4 A. We're talking about --

5 Q. I know what he said, but it changes as the
6 emails go.

7 A. Okay.

8 Q. But you also said on June 17th, I'm going to
9 sell you all rights without credits, meaning you can say
10 you wrote the song or sang it. You said that, right?

11 A. Run that by me again.

12 Q. You said you're selling him all rights and you
13 say you can say you sang it or wrote it.

14 A. Okay. You got me there. But that was after
15 the fact he had ripped me off and already pretended to be
16 the singer.

17 Q. And the fact that I stole your sunglasses, I
18 overpaid you for the price of the sunglasses and you
19 can't keep accusing me of stealing.

20 A. No, no, because we agreed. You gave me 500 for
21 those sunglasses.

22 Q. Right.

23 A. We agreed on 1,000. Where is my other 500 you
24 owe me?

25 Q. Okay. And Joe and you agreed for \$1,500, which

1 he paid you.

2 A. I don't know.

3 Q. Okay.

4 A. Are you going to read all of this or just skip
5 around to the ones you like?

6 Q. I'm going to look at them all. And I think
7 I've been pretty fair about -- like I just read the one
8 that wasn't great for me -- for Joe.

9 A. I'm not accusing you of --

10 Q. I'm going to try -- I want the whole story to
11 be on the record.

12 A. Okay.

13 Q. And these are everything that I have, so...

14 A. I think we would have to go in order.

15 Q. Correct. And that's my intention.

16 A. I mean, not skip any of them.

17 Q. Well, some of them, like we're talking about
18 Toby Keith or, you know, some of the BS --

19 A. Okay.

20 Q. Again, I'm here. I'm here until they kick me
21 out.

22 So June 17th, the music for You Can't Believe,
23 the Terry Thompson story, You Can't --

24 A. You're skipping over some.

25 Q. What am I missing? You might have gotten them

1 out of order.

2 A. No.

3 Q. Which one is that?

4 A. Vince, I'm just an old country boy --

5 Q. Hold on.

6 A. And that bullshit. Excuse me.

7 Q. June 17th, 2013, yours had more than mine did.

8 Let me see -- let me see that one. Okay. Here it is.

9 Okay.

10 June 17th, from Joe to Vince: I know you do
11 good work.

12 A. You have done right by me, that's Joe talking.

13 Q. Yeah. I'm mainly doing these songs to make
14 them wonder what the hell I'm up to because they are
15 awesome songs, not like I am going to get rich off of
16 them.

17 So last line: So how about you talk to your
18 group and come up with a price with credits -- sorry --
19 for credits or without?

20 A. Right.

21 Q. That means that Joe is paying 200, 250 a song,
22 and you expected him to credit the band, right?

23 A. The very first song, yeah, I thought it was
24 450, but it could have been 250.

25 Q. Whatever. Less than 500.

1 A. From the very get-go. That's my point in this.
2 He ripped me off right from the very get-go.

3 Q. I understand. But then you seem -- not to go
4 back to the sunglasses point, that at some point you
5 caught him, right?

6 A. I did.

7 Q. And then you renegotiate?

8 A. Fair enough.

9 Q. Okay. And at some point by June 17th at 2013
10 at 6:51 a.m. you say: Give me a price where I've got to
11 credit you and I don't have to credit you.

12 A. Right.

13 Q. And then it looks like if we go to the time,
14 you say: Good deal. I appreciate that.

15 A. Where are we at here?

16 Q. Page with: Hey, Joe, good deal. I appreciate
17 that. Make sure I have them in order. You have the one
18 that says -- oh, no, there it is: I think this is the
19 best way -- now he's not upset any more. That's 5:22.
20 4:13 comes before 5:22. That one was at 6:51 a.m. that
21 we just talked about. The next one will be at 4:13 p.m.
22 from you.

23 Then going to the bottom of -- if you go into
24 this one -- this one (indicating).

25 A. June 17.

1 Q. The bottom email, June 17, 2:56 p.m.

2 A. Okay. Well, it's funny you keep skipping
3 around.

4 Q. Well, it's because -- so 2:56 comes before
5 4:13, so sometime the emails are chronologically,
6 sometimes you scroll up. But regardless, they're from
7 the same day.

8 So there's a line: If Danny is too upset, I
9 would love for him to do the vocals on the mall and give
10 me the opportunity to buy them from him versus sending
11 them myself.

12 Can you read that?

13 A. I believe. I can't really see it, though, but
14 I believe what you're saying.

15 Q. And Joe said that he didn't want to do a
16 five-hour round-trip to Dallas to go to a studio and sing
17 it.

18 A. Put down smirk on face.

19 Q. Fair enough.

20 And then he said he tried to sing it and he
21 couldn't make it through without crying.

22 A. Okay.

23 Q. And then the last line: PS, in this contract,
24 do I need to name Danny or just the band?

25 A. I don't know what he's babbling about there.

1 Q. Okay. Fair enough.

2 The next one, and then I think we can fast
3 forward some, but we can fast forward piecemeal so you
4 make sure you've looked at all of them.

5 The next one is at 5:22, which is the one I'm
6 looking at. This one.

7 A. Okay.

8 Q. From Vince to Joe: Hey, Joe. I think this is
9 the best way. No, he's not upset anymore. He just looks
10 at it as a business deal. We can go one song at a time,
11 if you wish. So this contract would deal with I Saw a
12 Tiger. You would need to include me as the writer.
13 Danny is the vocalist. Stating we have sold all rights
14 to the composition song for \$1,500 and have no claims
15 whatsoever to ownership and we can never use the song,
16 play the song, et cetera, et cetera. In a nutshell, it's
17 Joe's song.

18 Do you recall saying all that?

19 A. Keep reading.

20 Q. Okay. I'm no longer, thank God --

21 A. That's all --

22 Q. That's it? Okay. But you're also pro se
23 today, right?

24 A. (Indicating.)

25 Q. So if I've left anything out, feel free to add

1 it. We will do some great work together.

2 A. But you admitted yourself that these aren't all
3 the emails. I mean, you're kind of cherry picking.

4 Q. These are all the emails that I have from him
5 to you and you to him.

6 A. No, absolutely not. Oh, well, I haven't read
7 them all. But do you have the one where he calls
8 Shaquille O'Neal the biggest nigger that I've ever seen
9 and I don't have a cage big enough to hold him?

10 Do you have the one from Joe asking me if I
11 knew anybody to get rid of Carole?

12 Do you have the ones in here that he called his
13 donors fat, ugly and stupid.

14 Q. To you?

15 A. I don't know. I don't know. I could have sent
16 them to friends or something.

17 Q. Because none of that relates to this, and I've
18 never seen those emails.

19 A. Well, yeah, because whoever done this cherry
20 picked.

21 Q. Well, but --

22 A. Or this can't be all the emails, you admitted
23 that.

24 Q. For purposes I'm talking about, the transfer of
25 music rights agreements. I'm not talking about Carole

1 and Shaq. It doesn't matter.

2 And what I have is you saying I'm going to sell
3 you everything for \$1,500, signing an agreement, and then
4 keep repeatedly going back to how you caught him on the
5 YouTube video.

6 A. Which is true. But the 1,500, that doesn't
7 cover -- that's why something is missing, because we
8 agreed on more than that. And where are the emails of
9 him saying, oh, I'm not that type of person. I'm getting
10 my reality show on Animal Planet. I'll make everything
11 good. You have so much more money coming, blah, blah,
12 blah. I hope these are in there.

13 Q. We'll get through them.

14 Is that in the contract -- is any of that stuff
15 in the contract from the transfer of music rights
16 agreement that you refer to on June 17, 2013?

17 A. No, and you'll notice there's no dollar amount
18 either.

19 Q. Right.

20 A. All right.

21 Q. But the email address addresses the dollar
22 amount of \$1,500.

23 A. That doesn't (indicating).

24 Q. Correct, I agree with you the contract doesn't
25 say it.

1 A. All right. I mean, that's what you initially
2 went to court with. Did I give him those songs because I
3 liked his smile? That whole thing -- what is that
4 saying? You know, there's no dollar amount.

5 Q. But are you denying you sent the email from
6 June 17, 2013, where you say this contract would deal
7 with I Saw a Tiger. You would need to include me as the
8 writer, Danny as the vocalist, stating that we have sold
9 all rights for the composition song for \$1,500 and have
10 no claims whatsoever to ownership and we can never use
11 the song, play the song, et cetera, et cetera, in a
12 nutshell it's Joe's songs. Those were your words?

13 A. Yeah. Yeah. I would have sent -- yeah.

14 Q. And then the next page at 10:31 p.m. on June
15 17th: Hey, Joe. It may sound old and corny --

16 A. Okay. Where are we at?

17 Q. This one (indicating).

18 A. June 17th.

19 Q. Here it is.

20 A man's word should be his bond. Nowadays you
21 shake someone's hand, you've got to count your fingers
22 afterwards. No, we will never post the song. You have
23 my word on that. Danny's last name is Clinton. My last
24 name is Johnson.

25 Did you say that?

1 A. Evidently.

2 Q. And sometime around then, you signed what we've
3 marked as Plaintiff's exhibit, Transfer of Music Rights
4 Agreement.

5 A. Okay. After the fact. After he'd already
6 ripped me off.

7 Q. Whose sunglasses are those?

8 A. I don't know about that analogy you're using
9 there, man.

10 For somebody to steal your work, do you know
11 what that's like? For somebody to post a video -- he was
12 just supposed to play the song in his gift shop. He
13 wasn't supposed to lip-sync and act like he was a singer
14 or writer. Don't you understand when somebody rips you
15 off?

16 Q. The Sun Says was also another song that was
17 subject to the Transfer of Music Rights Agreement, which
18 we'll mark as Plaintiff 3.

19 Do you agree with me?

20 A. Yes.

21 Q. Is that signed by you and Danny?

22 A. Yes. But it's still that same contract. This
23 should be heard in the state of Oklahoma not in Florida,
24 your backyard. Good on you to get that.

25 (Deposition Exhibit No. 3 was marked for

1 identification.)

2 BY MR. PHILLIPS:

3 Q. Plaintiff's 4 refers to My First Love. Was My
4 First Love subject to the Transfer of Music Rights
5 Agreement and Credits Agreement?

6 A. Yes.

7 Q. Is that your signature and Mr. Clinton's?

8 A. Clinton, yeah. This agreement that will be
9 given by the laws in the state of Oklahoma.

10 Q. Fair enough.

11 A. Not Florida.

12 Q. You can make that point every time.

13 (Deposition Exhibit No. 4 was marked for
14 identification.)

15 BY MR. PHILLIPS:

16 Q. Pretty Woman Lover, did you sign an agreement
17 for that song?

18 A. I did.

19 Q. Okay. So we'll mark that as Plaintiff's 5.

20 (Deposition Exhibit No. 5 was marked for
21 identification.)

22 BY MR. PHILLIPS:

23 Q. And then ultimately I'll present to you what
24 we'll mark as Plaintiff's Exhibit 6 in a second. There
25 was an agreement called Compensate Employee

1 Confidentiality Agreement.

2 Did you seen that?

3 A. I did.

4 Q. Okay. And the last paragraph of that: In the
5 event you breach (or your agents) breach this
6 Confidentiality Agreement, you will pay as liquidated
7 damages, and not as a penalty, the sum of \$1 million for
8 each such breach.

9 Is that part of that agreement?

10 A. Evidently.

11 (Deposition Exhibit No. 6 was marked for
12 identification.)

13 BY MR. PHILLIPS:

14 Q. February 17th, 2014, it should be in that
15 stack.

16 A. February what?

17 Q. 17th. Lawyers have numbering, it's called
18 Bates stamping. And sometimes they over-Bates stamp and
19 I wish we --

20 From Joe to Vince and Danny Clinton: Hey,
21 guys, I've really enjoyed working with you both a lot.
22 You're both awesome with what you do. I would love to
23 continue to work with both of you much more in the future
24 but don't want to get caught in between a money argument.
25 For Pretty Woman, I have sent Danny 1250 and Friday will

1 have Vince paid in full 1,250, also which paid the song
2 2,500 so any dispute will need to be worked out between
3 you both as I really don't want to get caught in the
4 middle of who deserves what amount.

5 Do you know what he's talking about where you
6 and Danny were fighting over the amount of money due for
7 songs?

8 A. No.

9 Q. Joe says: For future songs, I will either pay
10 50/50 and you work out the studio amount between each of
11 you or I will pay Vince a set of amount for writing and
12 Danny a set amount to do vocals, studios or instrumentals
13 or however you want to work it out. Makes no difference.
14 We just can't get caught between -- but can't get caught
15 between one gets more than the other or whatever.

16 Again, do you recall what he's talking about?

17 A. I don't know.

18 Q. Okay. And the email below that, 10:28 p.m. on
19 February 17th from Vince to Joe: Your and my agreement
20 is \$1,500 and 1,000 to Danny for My First Love which
21 you've paid in full. And the same for Pretty Woman
22 Lover, which you have paid me two to 400 and you said
23 sending another 400 tonight so I'm owed another 500 on
24 Pretty Woman Lover.

25 At that point did you address Joe owing you for

1 I Saw a Tiger?

2 A. Are you talking about this (indicating)?

3 Q. Yes. It appears you were paid up for I Saw a
4 Tiger, GW and Me and The Sun Says by then; is that
5 correct?

6 A. Yeah, whether I was paid up or not. I was
7 never paid up.

8 Q. What do you mean?

9 A. We were supposed to get -- I was supposed to
10 get -- we were supposed to get \$7,000 a song plus all
11 this money coming when he got his reality show on Animal
12 Planet.

13 Q. Where is that contract --

14 A. Well --

15 Q. -- or email?

16 A. You tell me where the email is. There was no
17 contract. But you said yourself, these aren't all the
18 emails, which I find curious.

19 Q. These are all the emails I have, and I don't
20 see --

21 A. Well, how could you go from -- why wouldn't you
22 have every email, the 300 emails? This is only, what,
23 40, 30? You guys cherry picked.

24 Q. No.

25 A. No?

1 Q. We are just going through what I have.

2 A. Okay.

3 Q. But so far, I don't see any agreement for 7,000
4 a song, by your own words, right?

5 A. Not --

6 Q. As if there were. In 2014 the prices were --
7 1,400 or \$2,500 a song.

8 A. Right. Okay.

9 Q. And you kept an accounting, like on February
10 17, 2014, you kept an accounting with what Joe owed you.
11 You kept telling him you still owe me on this one. You
12 owe me on this one.

13 A. Okay.

14 Q. And then that an email you say: These are my
15 songs, not fucking Danny's. I do all the work.

16 A. Wait a minute, man. Where are you now?

17 Q. Same place.

18 A. Here (indicating)?

19 Q. I think so.

20 A. Oh, okay. Which was true, I do all the work.

21 Q. And who -- what is your understanding of the --
22 did Carole Baskin depose you, of Big Cat Rescue, depose
23 you related to Joe's finances?

24 A. Baskin did, yes, because Joe obviously owed her
25 money and she wanted to know what --

1 Q. What he was spending his money on?

2 A. Right.

3 Q. Going to February 18th. I'll tell you what,
4 I'm glad mine have hole punches, so I don't get mine
5 confused with yours.

6 A. What was the date again?

7 Q. February 18, 2014, here (indicating).

8 From Joe to Vince and Danny: Okay. So, Joe,
9 referring to himself, is stuck between you two fighting
10 over who gets what. Y'all work it out and let me know.
11 As of this Friday, I paid \$2,500 for the song and get
12 emails from both of you saying different figure of who
13 gets what and who gets what for writing and who gets what
14 for singing. And I will pay the studio.

15 And it looks like four hours later you say:
16 You sent me \$200 January 27th, 2014, and then \$400 on
17 January 31st, 2014, and \$400 yesterday. That's \$1,000.
18 Our agreement -- you said are -- our agreement is \$1,500,
19 you owe me 500 more. That's our agreement. I told fat
20 ass off last night.

21 You're referring to Danny?

22 A. (Witness nods head affirmatively.)

23 Q. Okay. That's a yes?

24 A. Yeah.

25 Q. It seems you to me guys are trying to fuck me.

1 What did he contact you with? He's such a nice Christian
2 lad who just tries to be fair. You bought that bullshit.
3 He's a lazy egomaniac leach. You have no idea how many
4 jobs/money I've made that fucking guy. Do you know what
5 he's done for me? Nothing, all caps. And if you don't
6 believe me, ask him. If he can just name one thing he's
7 done for The Clinton Johnson Band, me, I'll fly out to
8 Oklahoma and buttfuck a Chinaman on Main Street at rush
9 hour, so you decide to not only take my money from me but
10 to pay him first. I've told you over and over again
11 these are my fucking songs.

12 Do you remember saying that?

13 A. No, I do not. And you've cherry picked by your
14 own admission. I had 300 emails with him.

15 Q. So you said, but you don't have any of them
16 remaining, correct?

17 A. Not that I know of. And what's the point of --
18 why are you reading that? What are you asking? What's
19 your question on it?

20 Q. You don't recall sending that?

21 A. The email?

22 Q. Yeah.

23 A. Of course I don't recall.

24 Q. Do you dispute sending that?

25 A. It's 2014.

1 Q. Do you dispute sending that one?

2 A. No. I dispute you cherry picking 300 emails
3 and picking 30 of them. You don't have the one about Joe
4 calling go Shaq a nigger, and you don't have a cage big
5 enough to hold him. I don't see that here.

6 Q. Because it doesn't exist.

7 A. Oh, it certainly does.

8 Q. Would you like to produce it? Please produce
9 it.

10 A. I don't know. I don't know if I have it or if
11 I sent it to somebody.

12 So you're saying that I'm making that up?

13 Q. I'm not here to be deposed today, but I don't
14 have it and I've never seen it.

15 A. But you just said it doesn't exist.

16 Q. It doesn't exist. You don't have a copy of it,
17 and I don't have a copy of it.

18 A. On this table.

19 Q. So moving to June 15th, 2014, this one, from
20 Joe to Vince and Danny: Look, first of all, I am far too
21 professional to play fucking games. Is this how you
22 people treat all of your clients or have you had any
23 before? You would think you would have a bit more
24 professional attitude with someone that's spent nearly
25 30,000 with you two.

1 So what is the Carole song and -- so where is
2 the Carole song and the Fun song at? These are the ones
3 I was proposed to, and if they are different lyrics, I
4 suggest someone stop playing games and produce them. I
5 will not buy something sight unseen any longer if these
6 are the games people -- games they're playing at my
7 expense.

8 Is that related to Killer Carole?

9 A. I don't know what he's babbling about.

10 Q. Okay. What is Killer Carole?

11 A. What is it?

12 Q. Yeah.

13 A. It's a song.

14 Q. Who wrote it?

15 A. I did, of course.

16 Q. Did Joe ask you to write it?

17 A. I don't remember. I don't know.

18 Q. June 15th, 2014. That's it. June 15, 2014,
19 the bottom one. No, wait, top right, from Vince to Joe:
20 Small Town -- third line from the bottom -- small Town,
21 Happy Song or fucking Killer Carole, that's just Danny
22 boy playing games. You can write your own songs from now
23 on or have fat boy write them or Minnie Pearl. I don't
24 give a rat's ass.

25 Do you recall saying that to Joe?

1 A. No, I don't.

2 Q. Do you dispute that that came from you?

3 A. I don't see what -- what am I responding to
4 here?

5 Q. Just saying do you dispute that that was an
6 email from you on June 15, 2014?

7 A. Yeah, I do, because I don't know what the hell
8 I would be responding to.

9 Q. And then going further down: All I want is
10 paid for The Happy Song and the Carole song, again, songs
11 you had me write. If you don't see that, then go ahead
12 and not pay me, sue me, whatever, and I'll do whatever I
13 have to do. I don't know how or why you're pissed at me
14 or feeling held hostage. I've done what you've asked,
15 period. And for the 10th time you bought the songs I
16 wrote. I Saw a Tiger, GW and Me, You Can't Believe, The
17 Sun Says, You've Got a Guardian, Harry Reid, sight
18 unseen.

19 And so in that sentence you admit that Joe
20 bought I Saw a Tiger, GW and Me, You Can't Believe, The
21 Sun Says. You've Got a Guardian and Harry Reid, correct?

22 A. Say that again.

23 Q. Joe purchased from you I Saw a Tiger, GW and
24 Me, You Can't Believe, The Sun Says, You've Got a
25 Guardian and Harry Reid as noted in the email on June 15,

1 2014?

2 A. No, I dispute that.

3 Q. Okay. So what did you mean: And for the 10th
4 time you bought the songs I wrote, I Saw a Tiger, GW and
5 Me, You Can't Believe, The Sun Says, You've Got a
6 Guardian, Harry Reid, sight unseen?

7 A. I don't know. I would need Joe's -- what I'm
8 talking about here. You just have what I'm saying. What
9 the hell was he saying?

10 Q. I already -- you say: I already wrote and
11 recorded My First Love and Pretty Woman Lover, which I
12 sent you, and you bought them. The only song of mine I
13 ran by you is Your Love Can Do and that's only because I
14 gave fat boy Do You Ever Wonder and he sent it to you
15 behind my back and you didn't like it so I wrote Your
16 Love Can Do.

17 I think the substance of this is you're telling
18 Joe you don't get editorial control -- you don't get to
19 approve my lyrics. I'm sending you songs and you're
20 paying for them, right?

21 A. Okay.

22 Q. And you're giving examples of songs that you
23 wrote and he paid for, sight unseen, correct?

24 A. That's the way it was, right? Unlike him
25 saying -- which I have 50 articles, all right, different

1 articles, interviews with Exotic claiming he wrote the
2 songs.

3 Q. Which he's allowed to do by your own emails and
4 contract.

5 A. No.

6 Q. Mr. Johnson, on June 17th, 2013, you said, to
7 Joe: So this contract would deal with I Saw a Tiger, you
8 would need to include me as the writer, Danny as the
9 vocalist, stating we have sold all rights to the
10 composition song for \$1,500 and have no claims whatsoever
11 to ownership and we can never use the song, play the
12 song, et cetera, et cetera. In a nutshell it's Joe's
13 song.

14 That was your --

15 A. That's part of it. You haven't got where he
16 hasn't paid full amount.

17 Q. He did for I Saw a Tiger. You even said in the
18 email we just went through that he paid for that
19 completely.

20 A. No, absolutely not. He didn't pay because, for
21 one thing, that shows he lied about, you know, that's
22 where a lot of money was supposed to come from.

23 Q. Which hasn't been referenced in any --

24 A. Not from what you brought.

25 Q. Okay. And not what you brought?

1 A. I don't have anything. You have them all,
2 though. You have every email, and you just cherry picked
3 these.

4 Q. I Saw a Tiger, Contract and Confidentiality
5 Agreement and your email.

6 Is there anything in those that required you to
7 be paid more than the \$1,500 that you said on June 17th,
8 2014?

9 A. Not from what you brought.

10 Q. Okay. Anything that you have in your
11 possession?

12 A. I don't know.

13 May I have some more water?

14 MR. PHILLIPS: We can take a break.

15 THE VIDEOGRAPHER: The time is 1:04 p.m. and we
16 are off the record.

17 (Off the record.)

18 THE VIDEOGRAPHER: The time is 1:08 p.m. and we
19 are back on the record.

20 BY MR. PHILLIPS:

21 Q. June 15th, 2014.

22 A. Okay.

23 Q. 6:34 p.m. from Joe to you: Well, shit, man, he
24 made it sound like those were the ones I was buying. I
25 just -- I'm not worried about that -- I just need the fun

1 song and the Carole song. When he gets them, I will
2 start the payments. Not a problem.

3 Again, the Carole song, is that Killer Carol?

4 A. I have no idea what he's talking about.

5 Q. Okay. Fair enough.

6 A. You know, since these are incomplete, cherry
7 picked, there's 30, 40 out of 300, I don't know if I
8 should be answering these. I think I'm going to talk to
9 my attorney and plead the Fifth from now on.

10 Q. June 16th, and you can -- you are your attorney
11 for purposes of the record today.

12 A. And I just conferred with myself.

13 Q. And the next one I'm going to refer to is this
14 one, June 16th, 2014 (indicating).

15 And it's you sending an email to Joe saying
16 you'll send him Killer Carol once another is 1,250 is
17 paid on that, correct?

18 A. I plead the Fifth.

19 Q. Okay. The Fifth Amendment is only applicable
20 if I'm asking some question that would affect your
21 criminal rights or it's self-incrimination.

22 A. You're saying the court won't respect or I'm
23 not allowed to take the Fifth, is that what you're
24 implying?

25 Q. The Fifth Amendment, if it's your contention

1 that you have criminal wrongdoing related to the song
2 Killer Carol, then I think the Fifth would be applicable.

3 But I'm just asking you if Joe offered to pay
4 you -- if you were telling Joe he needed to pay another
5 \$1,250 for the rights to the song Killer Carol.

6 A. And I'm telling you I plead the Fifth.

7 Q. Okay. What was Killer Carol about?

8 A. I plead the Fifth.

9 Q. Who wrote it?

10 A. I plead the Fifth.

11 Q. It appears you intend to obstruct this
12 deposition, and I have flown all the way across the
13 country at a very significant expense, and I'm going to
14 have to come back to ask these questions.

15 So are you going to continue to plead the Fifth
16 on the rest of my questions?

17 A. I'm not obstructing anything. I have a right
18 as a citizen under the Constitution -- you know more
19 about it than me -- but I'm pleading the Fifth.

20 This is incomplete, by your own words. You're
21 cherry picking things.

22 Q. I have the right to present whatever evidence I
23 want.

24 A. And I have the right to plead the Fifth, which
25 I am.

1 Q. You don't. But I'm not going to argue with you
2 about that.

3 A. You're saying I don't have a Fifth Amendment
4 right?

5 Q. Not in a civil case discussing matters that
6 will not and cannot incriminate you in a criminal court.

7 A. I believe you're wrong. I'm pleading the
8 Fifth.

9 Q. Okay. June 24th, 2014, in an email from you to
10 Joe you state: I should clarify a bit. The Happy Song,
11 the Killer Carol songs are not mine, they're yours. I
12 wrote them because you asked me to. And the last email I
13 got from you was June 15, 2014, and you said that -- and
14 you said get him a song, which I then did. You will get
15 me paid.

16 In that email, aren't you admitting that Killer
17 Carole is Joe Exotic's song?

18 A. I plead the Fifth. But of course not, he never
19 paid what he was supposed to on the song, so...

20 Q. July 1st, 2014, you state from an email from
21 Vince Johnson to Joe Exotic, on July 1st, 2014, at 4:42
22 p.m.: Waiting on Killer Carol which you had me write May
23 28th, 2014, are your songs not mine. New guy? All I
24 want is what was agreed on, pay 1,250 for writing The Fun
25 Song. Once paid I'll send you the Killer Carol song

1 which you'll owe another 1,250. Then I'm done.

2 Do you dispute that you sent that email?

3 A. I'm pleading the Fifth.

4 Q. Joe responds: That's what I'm trying to tell
5 you. Danny says he won't sing your songs. So if you
6 want to sell a song, you're going to have to send it to
7 me so I can -- so I can. But I need to see what the
8 singer -- but I need to see what this singer is paying
9 for. Is this hard to understand? So Danny is out of the
10 picture here. If you want me to buy your song, produce
11 the song, all I'm asking.

12 By July 1st, 2014, did Danny refuse to sing
13 your songs?

14 A. I'm pleading the Fifth.

15 Q. And did in that email Joe say that he will sing
16 his own songs that you write?

17 A. That's comical. He may have said that, but
18 it's comical.

19 Q. Okay. July 8, 2014, 1:26 p.m. in an email from
20 Vince Johnson to Joe Exotic: For whatever reason you've
21 chose to rip me off, Joe, so all songs are mine now until
22 I'm paid 1,250 for Waiting and 1,250 for Killer Carol.

23 Is this you saying now because he hasn't paid
24 you for Killer Carol and Waiting, you are confiscating
25 all the things you previously sold him?

1 A. Run that by me again.

2 Q. The line says: For whatever reason you've
3 chosen to rip me off, Joe, so all songs are mine until
4 I'm paid 1,250 for Waiting and 1,250 for Killer Carol.

5 What did you mean by that?

6 A. What is Waiting?

7 Q. I don't know. I assume it's a song that you
8 were waiting on getting paid for.

9 A. You're not reading the whole email, but I'm
10 pleading the Fifth, man.

11 Q. Okay. Then you say: Wednesday I will send I
12 Saw a Tiger by the Vince Johnson Band to all big cat
13 sanctuaries I can find online, letting them use it as a
14 theme song if they like.

15 Were you attempting to extort Joe Exotic at
16 that point?

17 A. Run that by me again.

18 Q. You said: Wednesday I will send I Saw a Tiger
19 by the Vince Johnson Band to all the big cat sanctuaries
20 I can find online, letting them use it as a theme song if
21 they'd like.

22 Is that your attempt to extort Joe Exotic to
23 obtain payment for Killer Carol?

24 A. Of course not. I plead the Fifth.

25 Q. That would probably be an appropriate Fifth

1 Amendment. We don't have an objection to that one.

2 Then you say: Thursday I will contact Carole
3 Baskin to see if she wants the song you had me write
4 about her.

5 Do you recall that?

6 A. I plead the Fifth.

7 Q. Did you contact Carole Baskin?

8 A. I plead the Fifth.

9 Q. Did you contact Howard Baskin?

10 A. I plead the Fifth.

11 Q. June 11, 2014, do you dispute that Danny
12 Clifton acknowledged that Joe paid him \$450 and that
13 brought his balance outstanding of \$2460?

14 A. I have no idea what you're talking about.

15 Q. And Danny referred to you as a piece of shit.

16 Do you recall that or did you know that?

17 A. I did not know that.

18 Q. Do you know how much --

19 A. We were friends for 15 years, me and Danny. We
20 had a falling out. The man is dead, you know.

21 Q. Do you know how much money in total Joe has
22 paid you and Danny?

23 A. Not near as much as he was supposed to.

24 Q. Okay. At one point you referenced an amount of
25 \$30,000.

1 Is it true that Joe has paid you in excess of
2 \$25,000?

3 A. I plead the Fifth.

4 Q. Who produced the video for Killer Carol?

5 A. I don't know.

6 Q. Who animated the video for Killer Carol?

7 A. I don't know.

8 Q. Who licensed Joe Exotic's image in the video
9 for Killer Carol?

10 A. I don't believe he's in the video, but I don't
11 know. That's all public domain stuff.

12 Q. Who is or is what email address is MelDouglas,
13 M-e-l-d-o-u-g-l-a-s-s, at g.com?

14 A. I plead the Fifth.

15 Q. Are you aware that some of Joe's payments were
16 directed to be sent to Lacey Decillo, L-a-c-e-y,
17 D-e-c-i-l-l-o?

18 A. I plead the Fifth.

19 Q. Did you sing any of the songs -- did you sing
20 in any of the songs that were provided to Joe?

21 A. No, I can't sing a lick, neither can Joe.
22 Danny done all the singing.

23 Q. Did you inform BMG about these transfer of
24 music rights agreements you had with Joe?

25 A. No, because they're phony.

1 Q. What do you mean they're phony?

2 A. I mean, his whole intention on these, the whole
3 intention was to commit fraud. Okay? The whole
4 intention was for him to act as a performer. You're the
5 lawyer. I believe it's recision under the law. This
6 isn't valid because you can't enforce a valid agreement
7 -- you can't enforce a dishonorable -- the intention was
8 for him to commit fraud --

9 Q. Because --

10 A. -- to act as the performer singer.

11 Q. But you were aware and specifically emailed him
12 that you don't care whether he claims if he wrote them or
13 sang them. You don't care whether or not he takes
14 credit.

15 A. If he would have paid me what he was supposed
16 to. I may have had that attitude, if everything he would
17 have said would have panned out.

18 Q. Basically upon everything we've gone through,
19 Joe paid you what he was supposed to for I Saw a Tiger.

20 A. No. Well, what we've gone through it was all
21 cherry picked. There was supposed to be other monies
22 coming. The guy promised more money and a reality show.

23 Q. And you don't have any proof of that, right?

24 A. I don't know.

25 Q. Are you aware of Joe's efforts to record any of

1 these songs or re-record any of these songs in recording
2 studios?

3 A. Exotic?

4 Q. Yes.

5 A. No. He had a video of him doing something in
6 his studio. Trust me, he did not sing any of them, none,
7 just him frauding the public.

8 Q. Did you have any part in writing or producing
9 the music videos?

10 A. Exotic's?

11 Q. Yes.

12 A. No.

13 Q. How many times were you in contact with Carole
14 or Howard Baskin during your dispute with Joe over the
15 music?

16 A. She contacted me about a year ago, in fact.
17 And before that, maybe -- hell, I don't know, two or
18 three times.

19 Q. Okay. When she contacted you what was it for?

20 A. She wanted -- she was talking about an author.
21 He was writing a book about the whole situation. She
22 wanted me to talk to him.

23 Q. Were you compensated for that?

24 A. No, I never talked to the guy. She's as evil
25 as Exotic.

1 Q. Fair enough.

2 Do recall doing a podcast or video interview
3 with a dentist?

4 A. Yes.

5 Q. Did you get compensated with free dental work,
6 in fact, new teeth, for doing that interview?

7 A. Yeah.

8 Q. I tell you what, let me take a break and sort
9 through what I have and then I'm going to try to wrap it
10 up in the next ten minutes or so.

11 THE VIDEOGRAPHER: The time is 1:28 p.m. and we
12 are off the record.

13 (Off the record.)

14 THE VIDEOGRAPHER: The time is 1:32 p.m. and we
15 are back on the record.

16 BY MR. PHILLIPS:

17 Q. What is Tiger King Publishing?

18 A. A business license.

19 Q. Who owns Tiger King Publishing?

20 A. I do.

21 Q. Did you get consent from Mr. Maldonado to use
22 the phrase or name, Tiger King?

23 A. Of course not.

24 Q. What's your affiliation with Tiger King?

25 A. Tiger King Publishing?

1 Q. Sure.

2 A. It's a business license, no more, no less.

3 Q. Do you own it?

4 A. Yeah. It's just a license. It's a -- just a
5 business license.

6 Q. It appears to be some level of publishing --
7 music publishing company, no?

8 A. In name only. I was advised by an attorney to
9 take the name because it's easier to -- it's easier to
10 have a name. He's the one that wanted me to use that, by
11 the way. I had Omega, Table, anything but that.

12 But Tiger King Publishing, you're on the wrong
13 track there like you were with Rip Roaring Records.
14 They're absolutely nothing.

15 Q. Do you feel that you own 100 percent of I Saw a
16 Tiger?

17 A. Yes.

18 Q. Why?

19 A. Because I wrote the song and -- because I wrote
20 the song and all the promises from your client he broke,
21 so, yeah, it's my song. If you ever wrote a song, when
22 you create something, it's yours. And if you make a deal
23 to sell it, I understand, you're a big boy, sell it. You
24 can't deal with a liar, though, man. Everybody has to,
25 you know, meet their end of the bargain.

1 Q. Okay. So you feel because Joe may have told
2 you a lie that the fact that he paid you for I Saw a
3 Tiger was null and void?

4 A. Yes, he paid me some for the song.

5 Q. Did he pay you completely for I Saw a Tiger?

6 A. No, he did not. He never paid me completely
7 for any of the songs. That's what I'm telling you.
8 That's what you're missing in this stuff.

9 Q. Because you contend there's some other
10 agreement years later that he --

11 A. Not years later, during this time period.

12 Q. Okay. All I've seen is you repeatedly in your
13 emails refer to a \$1,500 figure per song that you
14 negotiated and that he paid.

15 A. Fair enough. But there is more to it than
16 that, and if you had every email you would know.

17 Q. How are you not defrauding Joe by claiming you
18 own 100 percent of I Saw a Tiger when he bought it from
19 you?

20 A. Didn't I just answer that? He never paid me
21 what he was supposed to.

22 Q. And what is it he said he'd pay you?

23 A. He said he'd pay seven grand a song. Then he
24 said he had a -- oh, geez -- his exact wording, there's
25 several. It would always change. Man, I'm not like

1 that. When anything ever happens to these songs, I'll
2 make it right to you, brother, and all that bull --
3 nonsense.

4 Q. But you don't have any proof of that, correct?

5 A. I don't know.

6 Q. Who recorded the album Mind Guerilla,
7 G-u-e-r-i-l-l-a?

8 A. Jeff, guy name Jeff Bowen.

9 Q. With your consent?

10 A. Yes.

11 Q. Under the name The Vince Johnson Band?

12 A. Yeah. That was a mistake.

13 Q. What do you mean?

14 A. I mean, he was the artist, you know. But The
15 Vince Johnson Band is semi-recognizable, you know. Jeff
16 was, you know -- it should have been just the Jeff --
17 should have just been Jeff Bowen.

18 Q. Because you didn't sing?

19 A. No. I can't sing. I'm a terrible singer.

20 Q. But Joe shouldn't be able to claim -- it's your
21 opinion that Joe shouldn't be able to claim rights to
22 music he didn't sing, but yet The Vince Johnson Band
23 claimed that the music you didn't sing --

24 A. No, not that Joe didn't sing. He didn't write.
25 As a songwriter, I can do whatever the hell I want with

1 my song. I can have you sing it. Is it your contention
2 that I can't do what I want with my songs?

3 Q. Once you sell them.

4 A. How do you explain songs like My Angel Don't
5 Fly that Exotic's trying to take credit for?

6 Q. That's the subject of this lawsuit. Was there
7 a contract for My Angel Don't Fly?

8 A. No.

9 Q. I believe you told the court that Joe Exotic
10 illegally used your songs without your consent and
11 without any compensation.

12 Do you agree that's a false statement?

13 A. I plead the Fifth.

14 Q. Okay. I believe you told the court, Maldonado
15 never paid money I was promised.

16 Do you agree that's a false statement?

17 A. I plead the Fifth.

18 Q. Have you received any compensation for any --
19 in any way from Carole Baskin, Howard Baskin or Big Cat
20 Rescue?

21 A. Absolutely not.

22 Q. Killer Carol is about Carole Baskin?

23 A. Uh-huh.

24 Q. That's a yes?

25 A. Yes.

1 Q. And it's about the death of Don Lewis?

2 A. Yes.

3 Q. And it's about Carole Baskin causing the death
4 of Don Lewis?

5 A. Presumably.

6 Q. And you wrote it?

7 A. Yes, I wrote it.

8 Q. Do you believe Carole Baskin killed Don Lewis?

9 A. I won't answer that.

10 Q. What happened with -- was there some dispute
11 with a musician in Florida over some of these songs?

12 A. As I told the court, and I'll tell you, I don't
13 know anybody in Florida. I've never been to Florida, so
14 I don't know what in the world you're talking about.

15 Q. In your deposition with -- started by Carole
16 Baskin, didn't you acknowledge the validity of the
17 confidentiality agreement?

18 A. I plead the Fifth.

19 Q. In your deposition there was a question: Did
20 you ever talk -- did Joe ever talk to you about and tell
21 you that you -- that he wanted you to keep quiet about
22 the fact that he's not singing those songs on those
23 recordings?

24 And you said: Yeah, that came up after a
25 while.

1 Do you remember that?

2 A. This is from the Baskin deposition, according
3 to you?

4 Q. Yeah. She talked about Joe wanting the fact
5 that he wasn't the primary singer to remain confidential.

6 A. I plead the Fifth.

7 Q. In your deposition, you said you've talked to
8 Joe twice in your life on the phone.

9 Are you now saying it was three times?

10 A. I believe it was -- it could be two; could be
11 four. I don't know.

12 Q. I believe you said that everything -- okay.
13 You were asked if you still had emails and you said, no,
14 everything from that guy has been deleted when the
15 computer crashed about six months ago.

16 So your computer has crashed and you deleted
17 the email?

18 A. I plead the Fifth.

19 Q. What instruments do you play in The Vince
20 Johnson Band?

21 A. Anything with strings.

22 Q. How much input did Joe Exotic have in the
23 lyrics to Killer Carol?

24 A. Absolutely none.

25 Q. In an email -- your deposition references an

1 email between you and Carole Baskin on December 11, 2017.

2 Do you still have that?

3 A. No.

4 Q. Do you recall emailing Carole Baskin?

5 A. I recall she emailed me about that book I was
6 telling you about. I don't recall emailing her.

7 Q. In your deposition, it says that you said Joe
8 really wants me to record this song I wrote for him,
9 referring to Killer Carol.

10 Do you recall going to Carole Baskin and
11 reporting that Joe wanted to record or have Killer Carol
12 recorded?

13 A. I don't remember. I plead the Fifth on that.

14 Q. Who is Tracy, T-r-a-c-y, Mckeown,
15 M-c-k-e-o-w-n?

16 A. You tell me.

17 Q. Okay. You were asked: When is first time you
18 learned of him taking the song of yours that he didn't
19 have the authority to take?

20 And you said: About a month ago when that
21 dude, Jeff, contacted me.

22 Do you recall being alerted by somebody by the
23 name of Jeff that Joe was using your songs?

24 A. 2017? I knew long before that.

25 Q. Okay. Have you had conversations with either

1 Jeff Johnson or Jeff Lowe about Joe Exotic?

2 A. Yeah, Jeff Johnson. That must be what you were
3 referring to earlier, but you've taken that out of
4 context. That doesn't make sense.

5 Q. You testified that you and Johnson -- you said
6 -- they asked: Can you tell me what you and Mr. Johnson
7 talked about?

8 And you said: His hatred -- your mutual hatred
9 for Joe. I don't know the guy, all right? He just
10 contacted me out of the blue.

11 So you talked to Johnson about how much you
12 hated Joe Exotic?

13 A. About our mutual hatred. I don't know the guy,
14 and he killed himself, evidently.

15 Q. He did. Do you still hate Joe Exotic?

16 A. No, more of a pity thing now. Yeah, I've seen
17 Joe for what he is, a con man.

18 Q. Do you not feel like a con man given that Joe
19 paid you \$1,500 for music and now you're saying you own
20 100 percent of it?

21 A. No, because he never paid what he was supposed
22 to.

23 Q. Do you feel you owe Joe a refund for the
24 amounts that he's paid?

25 A. No, absolutely no, because how much money has

1 he made off my music acting like the performer? How many
2 CDs has he sold?

3 Q. Was that part of the contract?

4 A. What?

5 Q. That you were to receive a royalty on a
6 license --

7 A. Absolutely not, no. But money-wise, if anybody
8 owes anybody, trust me, it's Exotic owes me.

9 Q. Who sang Killer Carol, was that the Jeff guy?

10 A. Uh-huh.

11 Q. What was his last name?

12 A. Bowen.

13 Q. Did he rerecord or sing on the rereleases of I
14 Saw a Tiger and the other ones on that album?

15 A. Yes.

16 Q. Did Joe Exotic give him or you permission to do
17 so?

18 A. Are you serious?

19 Q. Yes.

20 A. No. I don't need his permission to do what I
21 want with my own songs, songs I wrote.

22 Q. Even though you sold them to Joe?

23 A. Even though he never paid me.

24 Q. You said he never paid you. You don't dispute
25 that you've received nearly if not more than \$30,000 from

1 Joe.

2 A. No, I dispute that all right.

3 Q. You dispute that he paid you \$1,500 as
4 requested for I Saw a Tiger?

5 A. I don't know. This is years ago.

6 MR. PHILLIPS: That's all the questions that I
7 have. You are entitled to put on the record anything
8 that you want.

9 THE WITNESS: I would like to put on the record
10 that these emails he brought are inadequate, incomplete.
11 He's cherry picked things favorable to his client and has
12 left out hundreds of emails that would prove what I'm
13 saying, that Exotic never paid the full amount and Exotic
14 lied time after time.

15 Exotic asked me if I knew anybody to get rid of
16 Carole.

17 Exotic told me that his donors are fat, ugly,
18 you know, morons.

19 Exotic said, as I believe you have that in the
20 record that Shaquille O'Neal, the biggest nigger -- his
21 words -- I ever seen. I don't have a cage big enough to
22 hold him.

23 So that just shows the character, you know, he
24 has.

25 And another thing, why this contract -- it's

1 not a contract. It's an agreement, isn't valid, because
2 of his character, for one thing.

3 Another is it's totally based on fraud. This
4 agreement was set up for fraud, so he could pretend he's
5 the singer, writer, whatever. It's set up for fraud. I
6 already said that. I'm sorry.

7 And his own agreement says this shall be
8 governed by the laws in State of Oklahoma, yet for some
9 strange reason, this is being heard in Florida.

10 That's it. Thank you.

11 MR. PHILLIPS: We'll attach the large versions,
12 just for clarification of the record, Plaintiff's 7.

13 BY MR. PHILLIPS:

14 Q. What did you bring with you today, just this?

15 A. Just this.

16 Q. We'll attach that as --

17 A. This is just what you sent me.

18 Q. Okay. We'll attach that as Plaintiff's 8, just
19 so we have what you brought with you.

20 A. No, this is just mine. I didn't bring it for
21 any evidence.

22 Q. So you're refusing to attach that, and you
23 didn't --

24 A. Okay. You can attach it, then, if it makes you
25 happy, but it's just --

1 Q. I'm aware. Plaintiff's 8. And we're done.

2 THE VIDEOGRAPHER: The time is 1:58 p.m. and we
3 are off the record.

4 (Deposition Exhibits No. 7 and 8 were marked
5 for identification.)

6 MR. PHILLIPS: We'll take a copy, no rush.
7 I'll provide you a copy when it's transcribed.

8 THE WITNESS: Okay.

9 MR. PHILLIPS: And we'll take a copy of the
10 video. I think it was included in it.

11 (Deposition concluded at 2:00 p.m.)
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CERTIFICATE

1
2
3 I, Teresa L. Rider, a Certified Court Reporter
4 for Washington, pursuant to RCW 5.28.010 authorized to
5 administer oaths and affirmations in and for the State of
6 Washington, do hereby certify that VINCE JOHNSON
7 personally appeared before me at the time and place set
8 forth in the caption hereof; that at said time and place,
9 I reported in stenotype all testimony adduced and other
10 oral proceedings had in the foregoing matter; that
11 thereafter my notes were reduced to typewriting under my
12 direction pursuant to Washington Administrative Code
13 308-14-135, the transcript preparation format guideline;
14 and that the foregoing transcript, pages 4 to 84, both
15 inclusive, constitutes a full, true and accurate record
16 of all such testimony adduced and oral proceedings had,
17 and of the whole thereof.

18 Witness my hand and CCR stamp at Vancouver,
19 Washington, this 26th day of May 2023.
20
21
22

23 <%11029,Signature%>

Teresa L. Rider, RPR, CCR, CSR

24 CCR No. 2119

25 Expires 12-03-23

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

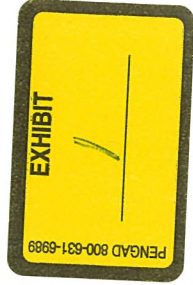
Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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<p>May 24, 2013</p>	<p>From: Joe Exotic Sent: Friday, May 24, 2013 4:07 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>you are freaking awesome. I will get with you after my show and get your pay pal again</p>	
<p>May 24, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, May 24, 2013 6:25 PM Subject: Re: I Saw a Tiger</p> <p>I appreciate that Joe music is so subjective you never know what people will like so I was a bit nervous glad you like it</p>	
<p>May 31, 2013</p>	<p>From: Joe Exotic Sent: Friday, May 31, 2013 7:02 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince This is the song I open my magic show with about my brother, you can change it around, shorten it, to get the point across and make it a sad country song. see what you can do dont use the ending message that is different</p>	
<p>May 31, 2013</p>	<p>Vince Johnson signs I Saw a Tiger Contract</p>	



<p>June 1, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Saturday, June 1, 2013 12:46 AM Subject: Re: I Saw a Tiger</p> <p>Hey Joe Got it-I had to change quite a bit</p> <hr/> <p>but the point is loud and clear so I'm good to go when you are Vince</p>	
<p>June 1, 2013</p>	<p>From: Joe Exotic Sent: Saturday, June 01, 2013 6:34 AM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince I will transfer 200 on monday, so I dont have to look through tons of emails what was your pay pal email again</p>	<p>Joe sends VJ \$200</p>
<p>June 1, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Saturday, June 1, 2013 12:47 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe realmensingloudandstrong@gmail.com Thanks Vince</p>	

<p>June 2, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 02, 2013 8:44 AM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>question, when you made the I saw a tiger did the studio give that to you on cd, could I get a copy or the original on cd as the file you emailed has alot of static?</p> <hr/> <p>just wondering</p>	
<p>June 2, 2013</p>	<p>From: Vince Johnson <vincejohnson@g.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 2, 2013 2:51 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe</p> <p>I just got hold of the studio I'll go in Tuesday and start the music then Danny will come in hopefully Friday for the vocals to answer your question NO there should be no static what so ever that was the mp3 from the studio I sent you when I go in Tuesday I will get you a WAV and a CD and send you if you could wait till the other song is done then I can send both at the same time what would possibly cause static if your just listening on your computer and Danny being a singer he likes his vocals out front which if not mixed right can lead to a bit of static</p> <p>Thanks Vince</p>	
<p>June 2, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 02, 2013 1:29 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>awesome thanks</p> <p>Starting - Joe Exotic</p>	

<p>June 7, 2013</p>	<p>To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, June 7, 2013 12:04 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe You will have your song Wednesday sorry that's as son as we can get in Vince</p>	
<p>June 7, 2013</p>	<p>From: Joe Exotic Sent: Friday, June 07, 2013 10:49 AM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>thats fine, when ever</p>	
<p>June 12, 2013</p>	<p>From: Vince Johnson <vincejohnson@a.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Wednesday, June 12, 2013 5:21 PM Subject: Re: I Saw a Tiger</p> <p>Hi Joe Just sent you G.W And Me I hope you like it Vince</p>	
<p>June 12, 2013</p>	<p>From: Joe Exotic Sent: Wednesday, June 12, 2013 3:33 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>got it, he whats your pay pal again, trying to put my thoughts together for a 3rd one, hope I am not being a pain in the butt. but your awesome.</p>	

<p>June 12, 2013</p>	<p>From: Joe Exotic Sent: Wednesday, June 12, 2013 3:40 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>awesome, got some ideas of how to turn it into a music video so you up to another one</p>	
<p>June 12, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Wednesday, June 12, 2013 5:54 PM Subject: Re: I Saw a Tiger</p> <p>Well I'm glad you like it I don't mind telling you it caused me a few sleepless nights when your writing about someone's life someone with loved one's its uncomfortable but anyways sure I can do another one and if you will give me your address I will get the CDs to you Thanks Vince</p>	
<p>June 14, 2013</p>	<p>From: Joe Exotic Sent: Friday, June 14, 2013 7:50 AM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince One more sad song and I promise the rest will be more positive, take your time on this one if you have to, I am putting a couple links for you to read, my friend in Ohio I swear he was killed and did not do this to himself or his animals, the animal rights people set this whole thing up to gain control of the exotic animal industry and pass the laws they want. I still believe he would not have let the animals out to be killed and why would he cut cages open when he had the key? let me know if you think this is to much? I would like to have a song that would raise question and clear this mans name to some point or at least make people think</p> <p>http://www.cleveland.com/cleveland/exotic-theories/Content?oid=2993303 http://www.gq.com/news-politics/newsmakers/2012/03/terry-thompson-ohio-zoo-massacre-chris-heath-gq-february-2012</p>	

<p style="text-align: center;">June 14, 2013</p>	<p> From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, June 14, 2013 12:15 PM Subject: Re: I Saw a Tiger </p> <p> Hi Joe I remember this story I don't care for that PETA bunch and other's like them to begin with they strike me as single minded radical nuts you me and a possum could be laying in the gutter injured and they would step over us to help the possum anyways I'll come up with something Thanks Vince </p>	
<p style="text-align: center;">June 14, 2013</p>	<p> From: Joe Exotic Sent: Friday, June 14, 2013 11:18 AM </p> <hr/> <p> To: Vince Johnson Subject: Re: I Saw a Tiger </p> <p> I will sent your first 200 tonight if you can come up with simular music as I saw a tiger, OMG, that was so awesome, gw and me was hard to hear, cryed everytime, your awesome guys </p>	

<p>June 14, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, June 14, 2013 2:30 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe</p> <p>Okay but I must tell you I cant lay the vocals down until July 12 my singer just got married is selling a house moving blah blah and we've been asked by Sylvester Stallones people to come up with a few songs what I'm saying Is I can get the song songs wrote to as many songs as you like between now and the 12th and get the music ready but Danny cant sing them till the 12th is this okay with you and as far as the music of I Saw A Tiger I can absolutely get that same type of feel so glad you like GW And Me I just about worried myself sick over that song so I'm very happy you like it</p> <p>Thanks Vince</p>	<p>Joe paid VJ \$200</p>
<p>June 14, 2013</p>	<p>From: Joe Exotic Sent: Friday, June 14, 2013 12:58 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince</p> <p>What ever it takes my man. July 12 is fine. like I said, you guys are awesome. let me think on some others, dont want to over load the animals or zoo thing ya know. but put some thought about a country song about a man with altimers that forgotten his whole life. I have a bad ass video Idea for one of those.</p> <p>sent ya 200</p>	

<p>June 14, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, June 14, 2013 3:59 PM Subject: Re: I Saw a Tiger</p> <hr/> <p>Hi Joe Okay I'll do a little research on Terry over the next couple days then start writing and I will give the alzheimer song some thought Thanks for the dough Vince</p>
<p>June 14, 2013</p>	<p>From: <u>Joe Exotic</u> Sent: Friday, June 14, 2013 2:10 PM To: <u>Vince Johnson</u> Subject: Re: I Saw a Tiger</p> <p>thanks for some of your miracles</p>

<p>June 14, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Friday, June 14, 2013 9:17 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe Done I read all I could on Terry and the situation and the song just came I put some venom into it I think its pretty cool I'll get the music done next week Thanks Vince</p>	
<p>June 14, 2013</p>	<p>From: Joe Exotic Sent: Friday, June 14, 2013 7:22 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>your the man, thank you. His poor wife has been through hell with the media and all, and I have been basically all she has as a voice, want to surprise her with a music video in honor of Terry.</p>	
<p>June 16, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 16, 2013 7:15 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe I just got a call from my singer he was pretty hot lol you need to understand the ego of singers there huge anyways he came across I Saw A Tiger on youtube and wants to know about the credits you are going to credited The Clinton Johnson Band correct Thanks Vince</p>	<p>VJ asks about credits for I Saw a Tiger</p>

June 15, 2014
Part 1

From: Joe Exotic
Sent: Sunday, June 15, 2014 2:11 PM
To: Vince Johnson
Subject: <No Subject>

if you remember right, I paid you for the small town song even though I have not used it., that was on this last balance

I ordered a song that anyone could relate to, fun, to do for youtube and this is not what I ordered?

I Got A Woman
How could this happen to someone like me
I was in a freefall i was in need
Everytime she moves everytime she breaths
I can feel the power rushin in me

Cause i got a woman and i understand
i got a woman and she's got a man
i got a woman and she's got a man

No more lookin no more runnin around
I'm done with the late nights in a lonely town
And i'll never walk alone i know
I got a cute little shadow everywhere i go

Cause i got a woman and i understand
I got a woman and she's got a man
I got a woman and she's got a man

Than I asked for a song about good ole carole. well where did this fit in?

I Got A Hot Little Whore

I got my whore out hookin 82nd and glisan street
And if she comes up short i take a bat right to her knee
Some say the american dream But its all big pimpin to me

Joe paid for
Small Town
Song

<p>June 15, 2014 Part 2</p>	<p>I got a hot little whore and she gives all her money to me I got a drop top caddis crack and a bottle a wine I got a phat diamond watch and the ladies think i'm fine I got gold all through my teeth A mac daddy if you ever seen I got a hot little whore and she gives all her money to me Well i aint worked a lick since 1995 But that crazy little girl still eats up all my jive And when i give her a little punch i say baby that just means love I got a hot little whore and she gives all her money to me Man i got a hot little whore and she gives all her money to me I got a hot little whore and she gives all her money to me Tired of being caught in the middle of you guys problems, so I guess the fun is over for right now. I wrote one last one that danny is doing then I am done. Time to spend some money on people that appreciate their clients. I didnt want to buy songs that anyone had laying around. All the ones i bought and paid for all some some kind of meaning. these last ones do not.</p>	
<p>June 15, 2014</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 15, 2014 4:33 PM Subject: Re: <No Subject></p> <p>What are you talking about Joe I Got A Woman I Got A Hot Little Whore has nothing to do with you those are my songs fatboy was supposed to do but instead he done the kitty song THOSE ARE NOT YOUR SONGS THERE MINE danny knows that he's just trying to start shit you did not pay me for the small town song you paid danny for his after having me write one first but I'm willing to let that slide just to show good faith but I want paid for the happy song and the kill card song you just had me write the fucking songs I have your emails that prove it</p>	<p>VJ Demands to be paid for Happy Song and Killer Carole</p>

June 15, 2014

From: Joe Exotic
Sent: Sunday, June 15, 2014 4:45 PM
To: Vince Johnson
Subject: Re: <No Subject>

so produce the lyrics to the two songs and let me know what the hell I am buying and I will buy them, make it clear than Vince,

Starring : Joe Exotic
A World you can connect with.
WWW.JOEXOTIC.TV.COM
Featured in Hollywood Weekly Magazine
Nat Geo Wild
CNN

From: Vince Johnson <vincejohnson@a.com>
To: Joe Exotic <joe_exotic@yahoo.com>

Page 7 of

June 15, 2014

Sent: Sunday, June 15, 2014 7:04 PM
Subject: Re: <No Subject>

We meaning you and me Joe have never done it that way your trying to change the rules on me if I showed a client songs before hand they could have me write 50 songs before there happy if danny showed you this small town and alisa his songs before hand that's between you and him I don't work that way never have never will you liked Tiger-GW-Thompson-Sun-Guardian-Ried without seeing my lyrics first so lets just keep the deal we have had you pay me the \$1250 then I give the song to danny that's the way you and me have always done it these are 2 more great songs in my humble opinion then like I said after these two I'm done I hope we can part friends again for the life of me I don't know why your pissed at me

From: Vince Johnson <vincejohnson@q.com>
To: Joe Exotic <joe_exotic@yahoo.com>
Sent: Sunday, June 16, 2013 11:08 PM
Subject: Re: I Saw a Tiger

Hey Joe

Well I'll read your email as I go and respond how much does my singer want I don't know he's got a side gig tonight so I can't contact him I can tell you tomorrow what do you have in mind no need to babysit me Joe the internet is a perfect tool for cowards I would never lower myself to that- that was Danny's wife not me I done my research and read this
before i started working with you as I said the internet can and is used by cowards fools slanders and cockroaches
but you have been good to me fair and cool and I have tried my best to write you some great songs
so regardless of what people say about you and or me hell with them
but I do appreciate you taking that into consideration

June 16, 2013

VJ offers to
sell the songs
to Joe
outright

I don't know Joe what may be the best solution is just truly buy the songs outright with no credit expected I Saw A Tiger GW And Me the ones with Danny's voice on so name a price
and yes I write the songs and can do the music without the voice
in fact You Cant Believe The Terry Thompson Story is really good
it don't take much for me to get pissed at the powers that be
anyways payoff credit I don't give a big rats ass
lets just all do whats right man I'm just a lowly songwriter this is giving me a headache lol
Thanks
Vince

From: Vince Johnson <vincejohnson@q.com>
To: Joe Exotic <joe_exotic@yahoo.com>
Sent: Sunday, June 16, 2013 7:56 PM
Subject: Re: I Saw a Tiger

Hey Joe
That last thing I want is bad blood also
as I said my singer called me pissed so I checked out the video
thought it was really cool by the way
and I saw the comments his wife made so I called him
and told him not to get his panties in a bunch
let me talk to Joe and I'll get it straightened out
I just got a email from JT kind of nasty one could say
I explained to him that credit was promised
I love writing songs and I appreciate you hiring me
but everyone wants recognition for there work
weather it be JT the cameraman whoever
so we need to figure something out
Vince

June 16, 2013

<p>June 16, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 16, 2013 5:18 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Yes, the guy who put the credits on the end did not know your name and he has been out of town and is going to remake it when he gets back. for now I can do the credit in the description of the youtube thing, I know how to do that</p>	
<p>June 16, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 16, 2013 7:26 PM Subject: Re: I Saw a Tiger</p> <p>Great if you can ad that were good to go</p>	
<p>June 16, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 16, 2013 5:38 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince just called my producers of my show and that does my stuff here, seems now we are in a pissing war. This is the second email me and you had Hi Joe Well if there songs I already have recorded 6 new ones and the 15 on the myspace \$100 per song to write and record something specific \$250 per song Thanks Vince</p> <p>the producer JJ had that contract you all sent so we could do it and promote the song to save the tigers on my branding not to work his butt off promoting the singer of the song. when you all sell a song is that not what you do is sell the song? just wondering but going online and posting bad comments on my youtube is not cool let me know how you want to proceed from here. I can sing and have access to a studio in dallas to record over if that needs to be done but I was paying more not to have to drive to dallas tx let me know, dont want bad blood between us. Joe</p>	

June 16, 2013

From: Joe Exotic
Sent: Sunday, June 16, 2013 6:37 PM
To: Vince Johnson
Subject: Re: I Saw a Tiger

so how much does the singer want for the first song? and are you the song writer and can you do the music for songs without the voice.

I have no problem giving you credit but on the first song it already has nearly 1000 views and if we change it we have to start from square one with views or is credit in the description of youtube good enough?

I just dont want to babysit comments on youtube from the band. You have done a great job writing songs.

if you notice I just let people think what they want, I have never commented that it was me signing, according to my pr firm in NY that is the best thing to do is let people keep guessing that is what makes them come back to you.

So let me know what would make everyone happy. on the next video we make with GW and Me, I will credit the band. (but trust me on this vince, I have not yet because the minute I do the animal rights people and my haters are going to spread you all over the internet and give you shit so is it worth it?)

this is the bitch right now along with the HSUS that fucks with everyone I do business with she wants control of all the tigers that bad.

do some research <http://911animalabuse.com/> look under her most wanted, I am at the top. I have been in a lawsuit with her for 2 years for slandering me.

and than watch her at work. <http://www.youtube.com/watch?v=Np9ZL8FYgbw>

really think about it, its just a song and is it worth getting tied up in the mess and drama.

Joe

June 17, 2013

From: Vince Johnson <vincejohnson@q.com>
To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com>
Sent: Monday, June 17, 2013, 01:56:29 PM EDT
Subject: Re: I Saw a Tiger

Hey Joe

Danny just called me he says he wants \$2000
a song to sell you all rights without credits
meaning you can say you wrote the song sang it whatever
please don't be mad at me I'm just telling you what the man wants
its funny you should mention Toby Keith I had a manager for a minute

he turned out to be a crook but that's another story
he was pitching my songs to Toby's manager who loved a song of mine called
I'm Glad My Mom Cant See Me but would I change a line so I did
and would I make Toby the co-writer which I said yes because that's the way its done in nashville
anyways they got down to 18 songs to pick from for his CD and mom was 1 of them
but he didn't record it- story of my life
so let me know what you think

Thanks

Vince

From: Joe Exotic
Sent: Monday, June 17, 2013 11:52 AM
To: Vince Johnson
Subject: Re: I Saw a Tiger

Vince

We just got over all these tornadoes and floods here, kinda strapped, see if he will cut me a break on
this one and take 1500.00 which I have in paypal right now.
the zoo rescue business sucks right now if you know what I mean, it goes from bad weather to 100
degrees in the same week.

<p>June 17, 2013</p>	<p>From: <u>Joe Exotic</u> Sent: Monday, June 17, 2013 6:51 AM To: <u>Vince Johnson</u> Subject: Re: I Saw a Tiger</p> <p>Vince</p> <p>Sorry for this to be such a big mess. I know you do good work, ask him if 500 more for I saw a tiger if that would be cool. I just rescue tigers and a poor country boy that everyone fucks with because I try and do the right thing and it pisses the animal rights people off. You have done right by me so I want to do right by you. I am mainly doing these songs to make them wonder just what the hell I am up too and because they are awesome songs, not like I am going to get rich off of them, or me and you would have done been kickin Toby Keiths back side by now, you know what I mean?</p> <p>so how about ya talk to your group and come up with a price for credits or without?</p> <p>Joe</p>	
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<p>June 17, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, June 17, 2013 2:27 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe I just talked to him DEAL, you can have JT or whoever write up something saying whatever you like and I'll have him sign it on the new song I will go in in a day or two this stuff has thrown me off and get the music done Thanks Vince</p>	<p>VJ's agreement to sell Joe I Saw a Tiger without expecting credit for \$1,500</p>
<p>June 17, 2013</p>	<p>From: Joe Exotic Sent: Monday, June 17, 2013 1:52 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>thats cool, no hurry, I will send you over something ok. sorry we both got stuck in the middle of egos, but could not expect anything less. lol I will never tell anyone I sang that as like I said, let them guess, makes it alot funner than giving them an answer either way. Joe</p> <p>Starting - Joe Exotic</p>	

<p>June 17, 2013</p>	<p>From: Vince Johnson <vincejohnson@a.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, June 17, 2013 4:13 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe Good deal I appreciate that the music for You Cant Believe The Terry Thompson Story you've already paid for but I'm unsure of what you want me to do with it just send it to you and you can sing it or wait till the 12th for Danny to do vocals man I'm telling you you can ask anyone in a band or in the music business about who has the biggest egos hands down singers and mines a doozy lol</p> <hr/> <p>it was money or credit for him so I'm glad we got that taking care of I'm with you there should be more mystery in songs/artist I don't really care if Danny or you or Elmer Fudd does my songs I may be a simpleton but its just about the act of writing and recording that floats my boat Thanks Joe Vince</p>	<p>You Can't Believe is paid</p>
<p>June 17, 2013</p>	<p>From: Joe Exotic Sent: Monday, June 17, 2013 2:56 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>you and me must be from the same mold. if Danny is not to upset, I would love for him to do the vocals on them all and give me the opportunity to buy them from him vs singing them myself. Like I said it is a 5 hour round trip to dallas for me and on some like the I saw a tiger it is worth it to just buy it, the GW and me I have not decided yet what to do with it, I tried singing it myself, cant make it through it yet without crying so I may just give him credit on that one, but I am hoping the terry one is a killer song which I am sure it will be so I would like to here Danny sing it. and I may just buy it from you all and do the video, Your awesome Joe PS in this contract do I need to name danny or just the band?</p>	

June 17, 2013

From: Vince Johnson <vincejohnson@q.com>
To: Joe Exotic <joe_exotic@yahoo.com>
Sent: Monday, June 17, 2013 5:22 PM
Subject: Re: I Saw a Tiger

Hey Joe
I think this is the best way no he's not upset anymore
he just looks at it as a business deal
we can just go one song at a time if you wish
so this contract would deal with I Saw A Tiger
you would need to include me as the writer danny as the vocalist
stating we have sold all rights to the composition/song for \$1500
and have no claims what so ever to ownership
and we can never use the song play the song etc etc
in a nutshell its Joes song
I'm no lawyer thank god lol so if I've leavt anything out feel free to ad to it
will do some great work together Joe the Terry song will get you
Thanks
Vince

June 17, 2013

From: Joe Exotic
Sent: Monday, June 17, 2013 7:09 PM
To: Vince Johnson
Subject: Re: I Saw a Tiger

cool, is Dannys name Johnson, and I could care less if you ever play the song. It is a freaking awesome
song, just wouldnt want you to put it online anywhere and confuse people. I am the easicst person you
will ever deal with. I am one of those brought up that your word is your bond, and a hand shake is a
contract.
I will get it to you tomorrow.
you all have great night.

<p>June 17, 2013</p>	<p>----- Forwarded Message ----- From: Vince Johnson <vincejohnson@q.com> To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com> Sent: Monday, June 17, 2013, 10:31:29 PM EDT Subject: Re: I Saw a Tiger</p> <p>Hey Joe Me to it may sound old and corny but a mans word should be his bond now a days you shake someone's hand you better count your fingers afterwards no we will never post the song you have my word on that Danny's last name is Clinton my last name is Johnson Thanks Vince</p>	
<p>June 18, 2013</p>	<p>Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>I Saw a Tiger</i></p>	
<p>July 26, 2013</p>	<p>Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>GW & Me</i></p>	
<p>October 2013</p>	<p>Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>The Sun Says</i></p>	

<p>December 2013</p>	<p>Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>My First Love</i></p>	<p>Joe buys Pretty Woman for \$2,500</p>
<p>February 17, 2014</p>	<p>From: Joe Exotic Sent: Monday, February 17, 2014 7:32 PM To: Vince Johnson ; Danny Clinton Subject: songs</p> <p>Hey guys, I have really enjoyed working with both of you alot, your both awesome at what each of you do, I would love to continue to work with both of you much more in the future but dont want to get caught in between a money argument.</p> <p>For pretty women I have sent Danny 1250.00 and friday will have Vince paid in full 1250.00 also which paid the song 2500.00 so any dispute will need to be worked out between you both as I really don't want to get caught in the middle of who deserves what amount.</p> <p>For future songs I will either pay 50/50 and you work out the studio amount between each of you or I will pay Vince a set amount for writing and Danny a set amount for the vocals, studio and instrumentals or how ever you want to work it out. Makes me no difference but can't get caught between one gets more than the other or what ever.</p> <p>I am copying both of you on this email so we are all on the same page but again I hope to do a total of 10 songs on this cd and would like to do another cd over this summer so I hope an agreement can be worked out on payments to who and how much so there is no confusion and I am not caught in the middle. Hate to see either of you break up I think you both give each other a hell of a talent in your own way.</p> <p>I have vince writing me another song so let me know how you all would like to move on with it so I can start getting payments to you. Joe</p>	<p>Joe buys My First Love for \$2,500</p> <p>In VJ's deposition, the PayPal Exhibit attached has a payment with notes that it was for My First Love and payments</p>
<p>February 17, 2014</p>	<p>From: Vince Johnson <vincejohnson@g.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, February 17, 2014 10:28 PM Subject: Re: songs</p> <p>Your and my agreement is \$1500 and \$1000 to danny for My First Love which you've paid in full and the same for Pretty Woman Lover which you have paid me \$200-\$400-and you said you sent another \$400 tonight so I'm owed another \$500 on Pretty Woman Lover and according to this email you've already paid danny that pisses me off these are MY songs not fucking dannels I do all the work in fact he told me and these are his exact words I want \$1000 a song and you get what you can get so I did seeing how there MY songs so I expect you Joe to honor our agreement</p>	<p>Joe buys My First Love for \$2,500</p> <p>In VJ's deposition, the PayPal Exhibit attached has a payment with notes that it was for My First Love and payments</p>

		to Danny for Pretty Woman Lover Page 62
February 18, 2014	<p>From: Joe.Exotic Sent: Tuesday, February 18, 2014 9:01 AM To: Vince Johnson ; <u>Danny Clinton</u> Subject: Re: songs</p> <p>ok so Joe is stuck between you too fighting over who gets what, ya all work it out and let me know, as of this friday I paid 2500,00 for the song and I get emails from both of you saying different figures of who gets what? and who gets what for writing and who gets what for singing and I will pay the studio.</p>	
February 18, 2014	<p>----- Forwarded Message ----- From: Vince Johnson <vincejohnson@q.com> To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com> Sent: Tuesday, February 18, 2014 at 01:04:27 PM EST Subject: Re: songs</p> <p>You sent me \$200 1-27-14 then \$400 1-31-14 and \$400 yesterday that's \$1000 are agreement is \$1500 you owe me \$500 more that's our agreement I told fatass off last night it seems to me you guys are trying to fuck me what did he contact you with he's such a nice Christian lad who just try's to be fair you bought that bullshit he's a lazy egomaniac leach you have no idea how many jobs/money I've made that fucking guy do you know what he's done for me NOTHING and if you don't believe me ask him if he can name just one thing he's done for the clinton johnson band/me I'll fly out to Oklahoma and buttfuck a chinaman on main street at rush hour so you decide to not only take my money from me but to pay him first I've told you over and over these are MY FUCKING SONGS</p>	VJ confirms what Joe paid him for Pretty Woman Lover
February 22, 2014	<p>Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>Pretty Woman Lover</i></p>	

From: Joe Exotic
Sent: Sunday, June 15, 2014, 3:31 PM
To: Vince Johnson ; Danny Clinton
Subject: Re: <No Subject>

Look, first of all I am far to professional to play fucking games. is this how you people treat all your clients or have you had any before. You would think you would have a bit more professional attitude with someone that spent nearly 30k, with you two. so where is the carole song and the fun song at, these are the ones I was proposed to, and if their are different lyrics, I suggest someone stop playing games and produce them, I will not buy something sight un seen any longer if these are the games people are playing at my expense.

I have contracts for everything I have bought and a confidentiality contract also, Would not bother me one bit to press those issues, but again, I have been on the professional end of this paying the bill while getting stuck in the middle of bulshit., NOT MY PROBLEM.

The whole purpose of me even doing any of this is to give people a reason to hope, smile and enjoy dying and shit, to bad you are not on the same page, I aint making shit doing this. Just like to see people smile. So no skin off my back to take them off line, or anything elsa. but I will NOT be held hostage between two people that cant get along.

So you all decide what the hell is going on, I am working my ass off to pay the bills here and if those are not the words you made for the songs I ordered you work it out, again, I dont know because it is always a secret of what you write before I buy it, so if you have a problem with danny changing it or something maybe you should let the guy who is buying it see it before it is sang.

Joe

June 15, 2014

<p>June 15, 2014</p>	<p>From: <u>Joe Exotic</u> Sent: Sunday, June 15, 2014 5:12 PM To: <u>Vince Johnson</u> Subject: Re: <No Subject></p> <p>Vince look, I dont know who is playing games with these two songs but danny says he only has the ones he sent me, which I sent you, he says you have not given him any others, so what am I buying please tell me. If your gonna bill me for them then I should see them right? whats the problem than. Just being honest</p> <p>Starring : Joe Exotic A World you can connect with.</p>
<p>June 15, 2014</p>	<p>From: <u>Vince Johnson</u> <vincejohnson@iq.com> To: <u>Joe Exotic</u> <joe_exotic@yahoo.com> Sent: Sunday, June 15, 2014 7:34 PM Subject: Re: <No Subject></p> <p>He doesn't have the new ones Joe he has my songs he knows that unless he's gone senile I sent him 3 songs about a month ago I Got A Woman-I Got A Hot Little Whoore-Man On A Ledge but he found time to do that kitty song the ones I've wrote for you he's never seen as I I said in my last email to you-you and me have never worked that way Joe me showing you before hand again the problem is you could have me write 50 songs you should trust me by now if I say these are just as good if not better then the other's I've wrote for you you should believe me</p>
<p>June 15, 2014</p>	<p>From: <u>Joe Exotic</u> Sent: Sunday, June 15, 2014 6:34 PM To: <u>Vince Johnson</u> Subject: Re: <No Subject></p> <p>well shit, man, he made it sound like those where the ones I was buying, I just need the fun song, and the carole song and when he gets them I will start the payments, not a problem</p>

VJ confirms
Joe bought:

I Saw a Tiger

GW and Me

You can't
believe

The Sun Says

You got a
Guardian

Harry Ried

My First
Love

Pretty Woman
Lover

From: Vince Johnson <vsjohn@hawaii.com>
To: Joe Exotic <joe_exotic@hawaii.com>
Sent: Sunday, June 15, 2014 6:06 PM
Subject: Re: <No Subject>

I told you Woman and Whore have nothing what so ever to do with you those are my songs not for you I cant make that any clearer I know it danny knows it and you should be smart enough to know it what the fuck does Woman and Whore have to do with small town-happy song-or fucking killer carol that's just danny boy playing games you can write your own songs from now on or have fatboy write them or minnie pearlie I don't give a rats ass

Page 8 of 1:

June 15, 2014

all I want is paid for the happy song and the carol song again songs YOU had me write if you don't see that then go ahead and not pay me sue me whatever and I'll do what I have to do I don't know how or why your pissed at me or feeling held hostage I've done what you asked period and for the 10th time you bought the songs I wrote I Saw A Tiger-GW And Me-You Cant Believe The Sun Says-You Got A Guardian-Harry Reid sight unseen I already wrote and recorded My First Love and Pretty Woman Lover which I sent you and you bought them the only song of mine I ran by you is Your Love Can Do and that's only because I gave fatboy Do You Ever Wonder and he sent it to you behind my back and you didn't like it so I wrote Your Love Can Do

<p>June 16, 2014</p>	<p>From: Vince Johnson <vincejohnson@a.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, June 16, 2014 1:33 PM Subject: Re: <No Subject></p> <p>I just sent fatboy your new song the fun one seeing how he's your bitch I'm sure he will send it to you my job on this one is done now \$1250 owed once paid I'll send him Killer Carol once another \$1250 is paid on that I'm done</p>
<p>June 16, 2014</p>	<p>From: Joe Exotic Sent: Monday, June 16, 2014 12:33 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>cool, have not heard from him in a few days, will try emailing him tonight</p>
<p>June 23, 2014</p>	<p>From: Vince Johnson <vincejohnson@a.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, June 23, 2014 9:53 AM Subject: Re: <No Subject></p> <p>\$?</p>
<p>June 24, 2014</p>	<p>From: Joe Exotic Sent: Tuesday, June 24, 2014 1:38 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>\$? for what I have not talked to danny in over a week, but he says he refuses to do any of your songs, so what the hell next</p>

<p>June 24, 2014</p>	<p>From: Joe Exotic Sent: Tuesday, June 24, 2014 3:14 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>which one is that so I can get on his ass about it.</p>	
<p>June 24, 2014</p>	<p>From: Vince Johnson <vincejohnson@gmail.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Tuesday, June 24, 2014 5:23 PM Subject: Re: <No Subject></p> <p>Now your talkin the song is called Waiting it's the fun Zac Brown type song I sent it to him several days ago right after you asked me to</p>	
<p>June 24, 2014</p>	<p>From: Joe Exotic Sent: Tuesday, June 24, 2014 3:56 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>I will send him an email about this now</p> <p>Starring : Joe Exotic A World you can connect with. www.joexoticity.com Featured in Hollywood Weekly Magazine Nat Geo Wild CNN InStyle Edition</p>	

<p>June 24, 2014</p>	<hr/> <p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Tuesday, June 24, 2014 4:38 PM Subject: Re: <No Subject></p> <p>I should clarify a bit the happy song the killer carol songs are not mine there yours I wrote them because you asked me to and the last email I got from you was 6-15-20014 and you said get him a song which I did then you will get me paid</p>	
<p>June 24, 2014</p>	<p>From: Joe Exotic Sent: Tuesday, June 24, 2014 2:58 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>well how about me just owning the lyrics and send me them, I will do these ones my self. Need to start my own album anyway since there is so much BS that way I dont have to have anyone over my head.</p> <p>Starring : Joe Exotic</p>	
<p>June 24, 2014</p>	<hr/> <p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Tuesday, June 24, 2014 3:03 PM Subject: Re: <No Subject></p> <p>Perfect Joe But we need to clean up the one I sent to fatboy first ?</p>	

<p>July 1, 2014</p>	<hr/> <p>From: Vince Johnson <vincejohnson@a.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Tuesday, July 1, 2014 9:01 AM Subject: Re: <No Subject></p> <p>Joe I fully expect a payment/payments to start no later than Monday 7-7-2014 for the song Waiting the song you had me write 5-26-2014 Vince</p>	
<p>July 1, 2014</p>	<p>From: Joe Exotic Sent: Tuesday, July 01, 2014 2:24 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>vince here is the deal, first of all I dont like your tone of voice, Danny will not sing for you so I am waiting for your lyrics to be produced to me before I by them. I will not be buying anything site un seen. You use to deliver the lyrics to danny before payment now you are delivering them right to me. The new guy and than payments will be sent. Thank you Joe</p>	

<p>July 1, 2014</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <ja_exotic@yahoo.com> Sent: Tuesday, July 1, 2014 4:42 PM Subject: Re: <No Subject></p> <hr/> <p>I don't need a lecture from you there is no tone just a mater of fact email regarding I want paid for work you had me do on 5-25-2014 I think I've been more then patient you asked me to send danny the lyrics 6-16-2014 which I did then you said you would start payments so what in the world are you talking about send to you I'll send them right now if you like but we've never done it that way before danny is to never sing one of my songs again period Waiting and Killer Carol which you had me write 5-28-2014 are your songs not mine new guy ? all I want is what was agreed on pay \$1250 for waiting the fun song once paid I'll send you the Carol song which you'll owe another \$1250 then I'm done Thank You Vince</p>
<p>July 1, 2014</p>	<p>From: <u>Joe Exotic</u> Sent: Tuesday, July 01, 2014 2:46 PM To: <u>Vince Johnson</u> Subject: Re: <No Subject></p> <p>ok, thats what I am trying to tell you, Danny says he wont sing your songs, so if you want to sell a song your gonna have to send it to me so I can, but I need to see what this singer is paying for, is this hard to understand, so danny is out of the picture here, if you want me to buy your song, produce the song, all I am asking,</p> <p>Starring - Joe Exotic</p>

<p>July 1, 2014</p>	<p>From: Vince Johnson <vincejohnson@ic.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Tuesday, July 1, 2014 4:59 PM Subject: Re: <No Subject></p> <p>Hard to understand of course you keep changing what you tell me Joe as I've told danny in no uncertain terms he's done bummin off me but if he wont sing your songs well that's between you and him or not I don't care who sings my songs I just sent you Waiting if your new singer wants to discuss it get the melody etc tell him he's free to give me a call if he wants there's a guy Chris Loid who you can get a top notch singer for \$100-200 a song just a idea anyways you have the song now and I hope everything is clear I will still expect payments to start before Monday correct ?</p>	
<p>July 2, 2014</p>	<p>From: Joe Exotic Sent: Wednesday, July 02, 2014 1:38 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>I dont need anyone to sing for my next set. doing it myself, this has turned into a nightmare. But I did however order a fast, fun song that did not relate to just a man or women so all ages and sex could enjoy. such as Hunter Hayes did. "Everybody's Got Somebody But Me" YouTube Mash-Up - Hunter Hayes feat. Jason Mraz</p> <p>"Everybody's Got Somebody But Me" YouTube Mash-Up ...</p> <p>View on www.youtube.com Preview by Yahoo</p> <p>The song you sent is about some guy in love with a chick? Vince are you just pulling out old songs you have already written?</p>	

<p>VJ testified in his depositions that he did furnish Joe with the CD of Killer Carole. Page 50. According to the emails, he would not have given this to Joe without payment.</p>	<p>----- Forwarded Message ----- From: Vince Johnson <vincejohnson@q.com> To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com> Sent: Tuesday, July 8, 2014, 01:26:16 PM EDT Subject: Re: <No Subject></p> <p>For whatever reason you've chose to rip me off Joe so all songs are mine now until i'm paid \$1250 for Waiting \$1250 for Killer Carol as you promised if not paid you've broken our contract and again all songs are mine this morning Tuesday- I sent The Ballad Of Harry Reid by The Vince Johnson Band to Hotair.com D Loesch B Oreilly G Beck S Hannily M Malkin A Jones Tparty.org because of the content Son Of A Bitch I know they wont play it but they'll like it Wednesday-I will send I Saw A Tiger by The Vince Johnson Band to all the big cat sanctuary's I can find online letting them use it as a theme song if they like Thursday-I will contact Carol Baskin to see if she want's the song you had me write about her and send You Cant Believe by The Vince Johnson Band to radio stations in Ohio Friday-I will contact guardians of the children and start sending out You Got A Guardian by The Vince Johnson Band to varies child abuse agencies that's this week next week will be much busier</p>	<p>July 8, 2014</p>
	<p>----- Forwarded Message ----- From: Danny Clinton <realmensingloudandstrong@gmail.com> To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com> Sent: Friday, July 11, 2014 at 07:00:09 PM EDT Subject: your new balance is...\$2,460.00</p> <p>Thank you very much Joe for your payment of \$450.00, that brings your new balance to \$2,460.00.</p> <p>Hope you're feeling better...please keep me updated on that if you don't mind.</p> <p>And try not to let Vince... "the piece of shit" get to you, don't let him stress you out.</p> <p>love ya bro, Danny.</p>	<p>July 11, 2014</p>
	<p>In VJ deposition, the attorney attached as Exhibit 3 PayPal records. One entry was a \$2000 payment from Joe to VJ.</p>	<p>November 8, 2014</p>

February 24, 2014	In VJ deposition, the attorney attached as Exhibit 3 PayPal records. Payment of unknown amount to Danny Clinton
February 26, 2014	Vince Johnson executes the Compensated Employee Confidentiality Agreement
March 9, 2014	In VJ deposition, the attorney attached as Exhibit 3 PayPal records. One entry was a \$450 payment from Joe to Danny Clinton.
March 20, 2014	In VJ deposition, the attorney attached as Exhibit 3 PayPal records. One entry was for an unknown amount from Joe to Danny Clinton with "payment for this ole town should make 1040.

August 14, 2016	Receipt of money transfer to Vince Johnson \$300	
January 2018	VJ testified in deposition, that in the 30 day period before his deposition, Jeff Johnson called him and told him Joe had a CD with VJ's songs.	
February 12, 2018	Deposition – Vince Johnson	
March 9, 2018	Deposition – Danny Clinton	
March 23, 2020	Vanity Fair – Tiger King: Inside Joe Exotic's Wild Homemade Music Videos	
March 24, 2020	LA Times – Is Netflix Tiger King star Joe Exotic really a country singer?	
March 27, 2020	Slate – Behind the Music of the Tiger King	
March 29, 2020	TMZ – Tiger King Band Behind Joe Exotic's Songs... Hopes to Strike Gold.	
March 30, 2020	Cosmopolitan - Tiger King's Joe Exotic doesn't actually sing his own songs	
March 30, 2020	People – Everything to Know About Joe Exotic's County Music Career- Including Who Was Really Singing	
April 1, 2020	BMG Contract Agreement	

June 2020	VJ releases Killer Carole	
June 4, 2020	TMZ – Tiger King Star Joe Exotic Band Behind the Tunes New Deal and Song – Killer Carole	
June 4, 2020	New York Post – Joe Exotic’s band inks record deal, set to debut new song – Killer Carole	
June 5, 2020	Chicago Tribune – Band behind Tiger King music lands publishing deal, release new Carole Baskin song	
June 5, 2020	Rolling Stone - Tiger King Songwriter Scores Publishing Deal, Shares New Song Killer Carole	
June 5, 2020	Variety – Tiger King Band Inks Licensing Deal, Releases New Carole Baskin Song	
June 7, 2020	BMG Release – Netflix’s Tiger King songwriter Vince Johnson signs global publishing agreement with BMG	
June 8, 2020	Tampa Bay – The band behind Joe Exotic’s Tiger King music releases new Carole Baskin song	
August 7, 2020	Mind Guerilla – VJ releases album entitled Mind Guerilla. It includes ALL of Joe’s songs – the ones subject of the complaint – and the ones JMP found of JM’s computer. Mind Guerilla streamed on all platforms	

October of 2020	JM trademarked – Joe Exotic and Tiger King	
October 18, 2021	Brad Small sent a Cease and Desist Letter to VJ	
October 25, 2018	VJ Responded	

The GW Zoo

Joe Exotic

25803 N. County Rd 3250

Wynnewood, OK. 73098

TRANSFER OF MUSIC RIGHTS AGREEMENT

This Agreement (the "Agreement") entered into on 5/31/113, together with all attached schedules and exhibits, shall constitute the terms and conditions of the agreement between Joe Schreibvogel aka Joe Exotic ("Company") and Vince Johnson The Clinton Johnson Dancer ("Producer").

The Producer has produced and warrants that the song entitled "I Saw A Tiger" is his original composition and was solely composed, produced and recorded by him. He relinquishes all copyright, publishing rights and all other related rights of the said song to include any and all uses to the company. All rights of the song "I Saw A Tiger" will rest with the company in purpituity in all jurisdications and through all process once this agreement is executed.

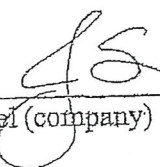
This Agreement is binding upon and shall inure to the benefit of the respective successors and/or assigns of the parties hereto.

This Agreement sets forth the entire agreement between the parties with respect to the subject matter hereof, and may not be modified or amended except by written agreement executed by the parties hereto,

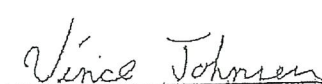
This Agreement shall be governed by the laws of the State of Oklahoma, applicable to agreements made and to be wholly performed therein.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first above written.

AGREED TO & ACCEPTED:



Joe Schreibvogel (company)



Producer

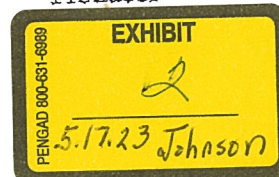


Exhibit 1
Exhibit 2

The GW Zoo

Joe Exotic

25803 N. County Rd 3250

Wynnewood, OK. 73098

TRANSFER OF MUSIC RIGHTS AND CREDITS AGREEMENT

This Agreement (the "Agreement") entered into on ~~11/23/23~~ together with all attached schedules and exhibits, shall constitute the terms and conditions of the agreement between Joe Schreibvogel aka Joe Exotic ("Company") and Vince Johnson and Danny Clinton, ("Producer").

The Producer has produced and warrants that the song entitled "The Sun Says" are his original composition and was solely composed, produced, sung and recorded by he and his band The Clinton Johnson Band. The Producer and band relinquish all copyright, publishing rights, performing rights, credits and any and all other related rights of the said song to include any and all uses to the company in perpetuity. This song covered by this agreement were ghost written and performed for the benefit of the company and solely on a work for hire basis. Furthermore the company can and will be in its sole right to seek reparations should the Producer, the Producers Band or any affiliate of the band seek to claim credit or rights on either/or of the aforementioned songs. All rights and credits to the song "The Sun Says" will rest with the company in perpetuity in all jurisdictions, through out the universe and through all process once this agreement is executed.

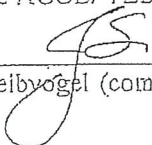
This Agreement is binding upon and shall inure to the benefit of the respective successors and/or assigns of the parties hereto.

This Agreement sets forth the entire agreement between the parties with respect to the subject matter hereof, and may not be modified or amended except by written agreement executed by the parties hereto.


This Agreement shall be governed by the laws of the State of Oklahoma, applicable to agreements made and to be wholly performed therein.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first above written.

AGREED TO & ACCEPTED:



Joe Schreibvogel (company)



Vince Johnson
Producer



The GW Zoo

Joe Exotic

25803 N. County Rd 3250

Wynnewood, OK. 73098

TRANSFER OF MUSIC RIGHTS AND CREDITS AGREEMENT

This Agreement (the "Agreement") entered into on ~~11/1/03~~, together with all attached schedules and exhibits, shall constitute the terms and conditions of the agreement between Joe Schreibvogel aka Joe Exotic ("Company") and Vince Johnson and Danny Clinton, ("Producer").

The Producer has produced and warrants that the song entitled "My First Love" are his original composition and was solely composed, produced, sung and recorded by he and his band The Clinton Johnson Band. The Producer and band relinquish all copyright, publishing rights, performing rights, credits and any and all other related rights of the said song to include any and all uses to the company in perpetuity. This song covered by this agreement were ghost written and performed for the benefit of the company and solely on a work for hire basis. Furthermore the company can and will be in its sole right to seek reparations should the Producer, the Producers Band or any affiliate of the band seek to claim credit or rights on either/or of the aforementioned songs. All rights and credits to the song "My First Love" will rest with the company in perpetuity in all jurisdictions, through out the universe and through all process once this agreement is executed.

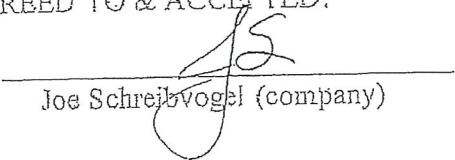
This Agreement is binding upon and shall inure to the benefit of the respective successors and/or assigns of the parties hereto.

This Agreement sets forth the entire agreement between the parties with respect to the subject matter hereof, and may not be modified or amended except by written agreement executed by the parties hereto,

This Agreement shall be governed by the laws of the State of Oklahoma, applicable to agreements made and to be wholly performed therein.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first above written.

AGREED TO & ACCEPTED:


Joe Schreibvogel (company)

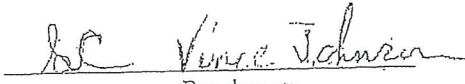

Vince Johnson
Producer



Exhibit 2
Exhibit 2

The GW Zoo
Joe Exotic
25803 N. County Rd 3250
Wynnewood, OK. 73098

TRANSFER OF MUSIC RIGHTS AND CREDITS AGREEMENT

This Agreement (the "Agreement") entered into on 2/22/14, together with all attached schedules and exhibits, shall constitute the terms and conditions of the agreement between Joe Schreibvogel aka Joe Exotic ("Company") and Vince Johnson and Danny Clinton ("Producer").

The Producer has produced and warrants that the song entitled "Pretty women lover" are his original composition and was solely composed, produced, sung and recorded by he and his band The Clinton Johnson Band. The Producer and band relinquish all copyright, publishing rights, performing rights, credits and any and all other related rights of the said song to include any and all uses to the company in perpetuity. This song covered by this agreement were ghost written and performed for the benefit of the company and solely on a work for hire basis. Furthermore the company can and will be in its sole right to seek reparations should the Producer, the Producers Band or any affiliate of the band seek to claim credit or rights on either/or of the aforementioned songs. All rights and credits to the song "Pretty women lover" will rest with the company in perpetuity in all jurisdictions, through-out the universe and through all process once this agreement is executed.

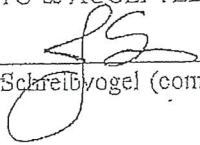
This Agreement is binding upon and shall inure to the benefit of the respective successors and/or assigns of the parties hereto.

This Agreement sets forth the entire agreement between the parties with respect to the subject matter hereof, and may not be modified or amended except by written agreement executed by the parties hereto,

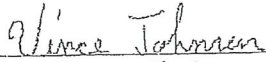
This Agreement shall be governed by the laws of the State of Oklahoma, applicable to agreements made and to be wholly performed therein.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the day and year first above written.

AGREED TO & ACCEPTED:



Joe Schreibvogel (company)



Vince Johnson
Producer

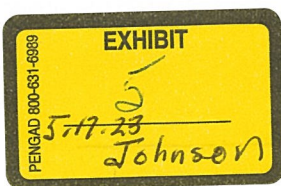


Exhibit 4
Exhibit 2

Compensated Employee Confidentiality Agreement

FOR GOOD CONSIDERATION, and in consideration of being compensated by Joe Schreibvogel/G.W. Zoo/ Tiger King Records/Joe Exotic TV/Reedflashman or any DBA thereof, the undersigned singer, songwriter, band or employee thereof hereby agrees and acknowledges:

1. That during the course of my employ/volunteer there may be disclosed to me certain trade secrets of the Company; said trade secrets consisting but not necessarily limited to:

(a) Technical information: Methods, processes, formulas, compositions, systems, techniques, inventions, machines, computer programs, research projects, songs, music, scripts and trade secrets.

(b) Business information: Customer lists, pricing data, sources of supply, financial data and marketing, diets, policies, procedures, inspections, complaints, accidents, inventory, production, or merchandising systems or plans.

2. I agree that I shall not during, or at any time while my being employed/volunteering with the Company, use for myself or others, or disclose or divulge to others including future employees, government agencies, animal rights groups, parents, friends, or relative any trade secrets, confidential information, or any other proprietary data of the Company in violation of this agreement.

3. That upon the termination of my employment/volunteering from the Company:

(a) I shall return to the Company all documents and property of the Company, including but not necessarily limited to: drawings, blueprints, reports, manuals, correspondence, customer lists, computer programs, keys, pictures, uniforms, audio or video and all other materials and all copies thereof relating in any way to the Company's business, or in any way obtained by me during the course of employ/volunteering. I further agree that I shall not retain copies, notes, or abstracts of the foregoing.

(b) The Company may notify any future or prospective employer or third party of the existence of this agreement, and shall be entitled to full injunctive relief for any breach.

(c) This agreement shall be binding upon me and my personal representatives and successors in interest, and shall inure to the benefit of the Company, its successors and assigns in the United States.

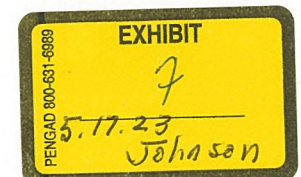
4. In the event of any breach by you (or your agents) of this Confidentiality Agreement, you shall pay as liquidated damages, and not as a penalty, the sum of One Million Dollars (\$1,000,000) for each such breach, which the parties agree represents reasonable compensation for the harm incurred as a result of such breach.

Signed this 2 day of 26, 2014.

JS _____ Vince Johnson _____
Joe Schreibvogel (Compensated Person) Print (Compensated Person) Sign



<p>June 16, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 16, 2013 5:18 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Yes, the guy who put the credits on the end did not know your name and he has been out of town and is going to remake it when he gets back. for now I can do the credit in the description of the youtube thing, I know how to do that</p>	
<p>June 16, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 16, 2013 7:26 PM Subject: Re: I Saw a Tiger</p> <p>Great if you can ad that were good to go</p>	
<p>June 16, 2013</p>	<p>From: Joe Exotic Sent: Sunday, June 16, 2013 5:38 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince just called my producers of my show and that does my stuff here, seems now we are in a pissing war. This is the second email me and you had Hi Joe Well if there songs I already have recorded 6 new ones and the 15 on the myspace \$100 per song to write and record something specific \$250 per song Thanks Vince</p> <p>the producer JT had that contract you all sent so we could do it and promote the song to save the tigers on my branding not to work his butt off promoting the singer of the song. when you all sell a song is that not what you do is sell the song? just wondering. but going online and posting bad comments on my youtube is not cool. let me know how you want to proceed from here. I can sing and have access to a studio in dallas to record over if that needs to be done but I was paying more not to have to drive to dallas tx. let me know. dont want bad blood between us. Joe</p>	



June 16, 2013	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 16, 2013 7:56 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe That last thing I want is bad blood also as I said my singer called me pissed so I checked out the video thought it was really cool by the way and I saw the comments his wife made so I called him and told him not to get his panties in a bunch let me talk to Joe and I'll get it straightened out I just got a email from JT kind of nasty one could say I explained to him that credit was promised I love writing songs and I appreciate you hiring me but everyone wants recognition for there work weather it be JT the cameraman whoever so we need to figure something out Vince</p>	
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<p>June 16, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 16, 2013 11:08 PM Subject: Re: I Saw a Tiger</p> <p>Hey Joe Well I'll read your email as I go and respond how much does my singer want I don't know he's got a side gig tonight so I cant contact him I can tell you tomorrow what do you have in mind no need to babysit me Joe the internet is a perfect tool for cowards I would never lower myself to that- that was Danny's wife not me I done my research and read this before i started working with you as I said the internet can and is used by cowards fools slanders and cockroaches but you have been good to me fair and cool and I have tried my best to write you some great songs so regardless of what people say about you and or me hell with them but I do appreciate you taking that into consideration</p> <hr/> <p>I don't know Joe what may be the best solution is just truly buy the songs outright with no credit expected I Saw A Tiger GW And Me the ones with Dannys voice on so name a price and yes I write the songs and can do the music without the voice in fact You Cant Believe The Terry Thompson Story is really good it don't take much for me to get pissed at the powers that be anyways payoff credit I don't give a big rats ass lets just all do whats right man I'm just a lowly songwriter this is giving me a headache lol Thanks Vince</p>	<p>VJ offers to sell the songs to Joe outright</p>
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June 16, 2013

From: Joe Exotic
Sent: Sunday, June 16, 2013 6:37 PM
To: Vince Johnson
Subject: Re: I Saw a Tiger

so how much does the singer want for the first song? and are you the song writer and can you do the music for songs without the voice.
I have no problem giving you credit but on the first song it already has nearly 1000 views and if we change it we have to start from square one with views or is credit in the description of youtube good enough?
I just dont want to babysit comments on youtube from the band. You have done a great job writing songs.
if you notice I just let people think what they want, I have never commented that it was me signing, according to my pr firm in NY that is the best thing to do is let people keep guessing that is what makes them come back to you.
So let me know what would make everyone happy. on the next video we make with GW and Me, I will credit the band. (but trust me on this vince, I have not yet because the minute I do the animal rights people and my haters are going to spread you all over the internet and give you shit so is it worth it?)
this is the bitch right now along with the HSUS that fucks with everyone I do business with she wants control of all the tigers that bad.
do some research <http://911animalabuse.com/> look under her most wanted, I am at the top. I have been in a lawsuit with her for 2 years for slandering me.
and than watch her at work. <http://www.youtube.com/watch?v=Np9ZJ8FYgbw>
really think about it, its just a song and is it worth getting tied up in the mess and drama.
Joe

<p>June 17, 2013</p>	<p>From: <u>Joe Exotic</u> Sent: Monday, June 17, 2013 6:51 AM To: <u>Vince Johnson</u> Subject: Re: I Saw a Tiger</p> <p>Vince Sorry for this to be such a big mess. I know you do good work, ask him if 500 more for I saw a tiger if that would be cool. I just rescue tigers and a poor country boy that everyone fucks with because I try and do the right thing and it pisses the animal rights people off. You have done right by me so I want to do right by you. I am mainly doing these songs to make them wonder just what the hell I am up too and because they are awesome songs, not like I am going to get rich off of them, or me and you would have done been kickin Toby Keiths back side by now, you know what I mean? so how about ya talk to your group and come up with a price for credits or without? Joe</p>	

<p>June 17, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, June 17, 2013 5:22 PM Subject: Re: I Saw a Tiger</p> <hr/> <p>Hey Joe I think this is the best way no he's not upset anymore he just looks at it as a business deal we can just go one song at a time if you wish so this contract would deal with I Saw A Tiger you would need to include me as the writer danny as the vocalist stating we have sold all rights to the composition/song for \$1500 and have no claims what so ever to ownership and we can never use the song play the song etc etc in a nutshell its Joes song I'm no lawyer thank god lol so if I've leavt anything out feel free to ad to it will do some great work together Joe the Terry song will get you Thanks Vince</p>	
<p>June 17, 2013</p>	<p>From: Joe Exotic Sent: Monday, June 17, 2013 7:09 PM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>cool, is Dannys name Johnson, and I could care less if you ever play the song, It is a freaking awesome song, just wouldnt want you to put it online anywhere and confuse people. I am the easiest person you will ever deal with. I am one of those brought up that your word is your bond, and a hand shake is a contract. I will get it to you tomorrow. you all have great night.</p>	

<p>June 17, 2013</p>	<p>From: Vince Johnson <vincejohnson@q.com> To: "joe_exotic@yahoo.com" <joe_exotic@yahoo.com> Sent: Monday, June 17, 2013, 01:56:29 PM EDT Subject: Re: I Saw a Tiger</p> <p>Hey Joe Danny just called me he says he wants \$2000 a song to sell you all rights without credits meaning you can say you wrote the song sang it whatever please don't be mad at me I'm just telling you what the man wants its funny you should mention Toby Keith I had a manager for a minute</p> <hr/> <p>he turned out to be a crook but that's another story he was pitching my songs to Toby's manager who loved a song of mine called I'm Glad My Mom Cant See Me but would I change a line so I did and would I make Toby the co-writer which I said yes because that's the way its done in nashville anyways they got down to 18 songs to pick from for his CD and mom was 1 of them but he didn't record it- story of my life so let me know what you think Thanks Vince</p>	
	<p>From: Joe Exotic Sent: Monday, June 17, 2013 11:52 AM To: Vince Johnson Subject: Re: I Saw a Tiger</p> <p>Vince We just got over all these tornadoes and floods here, kinda strapped, see if he will cut me a break on this one and take 1500.00 which I have in paypal right now. the zoo rescue business sucks right now if you know what I mean, it goes from bad weather to 100 degrees in the same week.</p>	

December 2013	Danny Clinton and Vince Johnson sign Transfer of Music Rights and Credits Agreement for <i>My First Love</i>	
February 17, 2014	<p>From: Joe Exotic Sent: Monday, February 17, 2014 7:32 PM To: Vince Johnson ; Danny Clinton Subject: songs</p> <p>Hey guys, I have really enjoyed working with both of you alot, your both awesome at what each of you do, I would love to continue to work with both of you much more in the future but dont want to get caught in between a money argument. For pretty women I have sent Danny 1250.00 and friday will have Vince paid in full 1250.00 also which paid the song 2500.00 so any dispute will need to be worked out between you both as I really don't want to get caught in the middle of who deserves what amount.</p> <p>For future songs I will either pay 50/50 and you work out the studio amount between each of you or I will pay Vince a set amount for writing and Danny a set amount for the vocals, studio and instrumentals or how ever you want to work it out. Makes me no difference but can't get caught between one gets more than the other or what ever.</p> <p>I am copying both of you on this email so we are all on the same page but again I hope to do a total of 10 songs on this cd and would like to do another cd over this summer so I hope an agreement can be worked out on payments to who and how much so there is no confusion and I am not caught in the middle. Hate to see either of you break up i think you both give each other a hell of a talent in your own way.</p> <p>I have vince writing me another song so let me know how you all would like to move on with it so I can start getting payments to you. Joe</p>	Joe buys Pretty Woman for \$2,500
February 17, 2014	<p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Monday, February 17, 2014 10:28 PM Subject: Re: songs</p> <p>Your and my agreement is \$1500 and \$1000 to danny for My First Love which you've paid in full and the same for Pretty Woman Lover which you have paid me \$200-\$400-and you said you sent another \$400 tonight so I'm owed another \$500 on Pretty Woman Lover and according to this email you've already paid danny that pisses me off these are MY songs not fucking dannels I do all the work in fact he told me and these are his exact words I want \$1000 a song and you get what you can get so I did seeing how there MY songs so I expect you Joe to honor our agreement</p>	Joe buys My First Love for \$2,500 In VJ's deposition, the PayPal Exhibit attached has a payment with notes that it was for My First Love and payments

<p>June 15, 2014 Part 2</p>	<p>I got a hot little whore and she gives all her money to me</p> <p>I got a drop top caddie crack and a bottle a wine I got a phat diamond watch and the ladys think i'm fine I got gold all through my teeth A mac daddy if you ever seen</p> <p>I got a hot little whore and she gives all her money to me</p> <p>Well i aint worked a lick since 1995 But that crazy little girl still eats up all my jive And when i give her a little punch i say baby that just means love</p> <p>I got a hot little whore and she gives all her money to me Man i got a hot little whore and she gives all her money to me I got a hot little whore and she gives all her money to me</p> <p>Tired of being caught in the middle of you guys problems, so I guess the fun is over for right now. I wrote one last one that danny is doing than I am done. Time to spend some money on people that appreciate their clients. I didnt want to buy songs that anyone had laying around. All the ones I bought and paid for all some some kind of meaning. these last ones do not.</p>	
<p>June 15, 2014</p>	<hr/> <p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com> Sent: Sunday, June 15, 2014 4:33 PM Subject: Re: <No Subject></p> <p>What are you talking about Joe I Got A Woman I Got A Hot Little Whore has nothing to do with you those are my songs fatboy was supposed to do but instead he done the kitty song THOSE ARE NOT YOUR SONGS THERE MINE danny knows that he's just trying to start shit you did not pay me for the small town song you paid danny for his after having me write one first but I'm willing to let that slide just to show good faith but I want paid for the happy song and the kill carol song you just had me write the fucking songs I have your emails that prove it</p>	<p>VJ Demands to be paid for Happy Song and Killer Carole</p>

June 15, 2014

From: Joe Exotic
Sent: Sunday, June 15, 2014 3:31 PM
To: Vince Johnson ; Danny Clinton
Subject: Re: <No Subject>

Look, first of all I am far to professional to play fucking games. is this how you people treat all your clients or have you had any before. You would think you would have a bit more professional attitude with someone that spent nearly 30k, with you two.
so where is the carole song and the fun song at, these are the ones I was proposed to, and if their are different lyrics, I suggest someone stop playing games and produce them, I will not buy something sight un seen any longer if these are the games people are playing at my expense.
I have contracts for everything I have bought and a confidentiality contract also, Would not bother me one bit to press those issues, but again, I have been on the professional end of this paying the bill while getting stuck in the middle of bullshit., NOT MY PROBLEM.

The whole purpose of me even doing any of this is to give people a reason to hope, smile and enjoy dying and shit, to bad you are not on the same page, I aint making shit doing this. Just like to see people smile. So no skin off my back to take them off line, or anything else. but I will NOT be held hostage between two people that cant get along.

So you all decide what the hell is going on, I am working my ass off to pay the bills here and if those are not the words you made for the songs I ordered you work it out, again, I dont know because it is always a secret of what you write before I buy it, so If you have a problem with danny changing it or something maybe you should let the guy who is buying it see it before it is sang.

Joe

<p>June 15, 2014</p>	<p>From: Joe Exotic Sent: Sunday, June 15, 2014 4:45 PM To: Vince Johnson Subject: Re: <No Subject></p> <p>so produce the lyrics to the two songs and let me know what the hell I am buying and I will buy them, make it clear than Vince,</p> <p>Starring : Joe Exotic A World you can connect with. www.joexotic.com Featured in Hollywood Weekly Magazine Nat Geo Wild CNN</p>	
<p>June 15, 2014</p>	<hr/> <p>From: Vince Johnson <vincejohnson@q.com> To: Joe Exotic <joe_exotic@yahoo.com></p> <p style="text-align: center;">Page 7 of</p> <hr/> <p>Sent: Sunday, June 15, 2014 7:04 PM Subject: Re: <No Subject></p> <p>We meaning you and me Joe have never done it that way your trying to change the rules on me if I showed a client songs before hand they could have me write 50 songs before there happy if danny showed you this small town and alisa his songs before hand that's between you and him I don't work that way never have never will you liked Tiger-GW-Thompson-Sun-Guardian-Reid without seeing my lyrics first so lets just keep the deal we have had you pay me the \$1250 then I give the song to danny that's the way you and me have always done it these are 2 more great songs in my humble opinion then like I said after these two I'm done I hope we can part friends again for the life of me I don't know why your pissed at me</p>	

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

JOSEPH MALDONADO,

Plaintiff,

Case No. 3:22-cv-18229-TKW-ZCB

v.

BMG RIGHTS MANAGEMENT LLC,
CREATE MUSIC GROUP, INC.,
TIGER KING PUBLISHING, RIP
ROARING RECORDS LLC, AND
VINCE JOHNSON,

Defendants.

NOTICE OF TAKING
VIDEO TAPED DEPOSITION OF VINCE JOHNSON

TO: VINCE JOHNSON
9307 NE 87TH Street
Vancouver, WA 98662

YOU are hereby notified that at 11:00 a.m., PST / 2:00pm, EST, on Wednesday, May 17, 2023, the attorney for Plaintiff will take the video-taped deposition of VINCE JOHNSON at Veritext Portland, 1000 SW Broadway, Suite 1660, Portland, Oregon 97205.

You must bring with you the following documents, electronically stored information, or objects: See Attached Schedule A.

Said deposition will be taken before a Notary Public or any officer authorized



to administer oaths by the laws of the State of Florida, and a person who is neither a relative or employee of any such attorney or counsel, and who is not financially interested in the action.

Said deposition to be taken pursuant to the Federal Rules of Civil Procedure in such cases provided. The oral examination will continue from hour to hour and from day to day until completed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the forgoing was served on Vince Johnson via electronic mail at vincejohnson@q.com; via regular mail to 9307 NE 87TH Street, Vancouver, Washington 98662; and via process service on this the 17th day of April 2023.

Respectfully submitted,

PHILLIPS, HUNT, WALKER & HANNA

/s/ John M. Phillips

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AMY HANNA, ESQUIRE

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cc: Veritext Portland

Schedule A

1. Any and all contracts, agreements, memorandum, and/or correspondence entered into by you and/or Tiger King Publishing associated with the music compilations at issue with this Complaint. This includes contracts and/or agreements entered into with BMG Rights management, Create Music Group and any other entity not listed herein.
2. Any and all documents, memorandum and/or correspondence supporting your claims to ownership of the subject music compilations.
3. Copies of any and all checks, transfers, income, fees, payments, advances made to you and/or Tiger King Publishing associated with the subject music compilations by any individual or entity.

I dont know - Vollerter
Dont ~~with~~ Any Information
Fraudulent Agreement - That states it shall be
wholly governed by the laws of Oklahoma
I dont know if i have Joe's Emails
Say Stag DONORS Fat ugly Get rid of Carol
BMG - Creat 2020 ~~never heard of Phillips Hunt~~
Joe concocted this Agreement up to 9/20/22
Committ Fraud
Under advise of my Attorney Im pleading
The Fifth
Dont Loss Your cool
Deleted Emails
signed with BMG/Creat ~~2020~~ 2020
Never Heard of you till 8-10 Months Ago
You mentioned ⁴ A Few Months Ago
Emails and such