

EXHIBIT 1

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

CASE NO.: 5:13-CV-00143-ACC-PRL

LARRY KLAYMAN,

Plaintiff,

vs.

CITY PAGES, KEN WEINER, a/k/a KEN AVIDOR, AARON
RUPER, PHOENIX NEW TIMES, MATTHEW HANDLEY, and VOICE
MEDIA GROUP,

Defendants.

222 Lakeview Avenue, Suite 1000
West Palm Beach, Florida 33401
September 9, 2014
10:03 a.m. - 1:06 p.m.

DEPOSITION OF LARRY KLAYMAN

Taken before Angela Saxon, Florida
Professional Reporter and Notary Public in and for
the State of Florida at Large, pursuant to Notice of
Taking Deposition filed in the above cause.

1 when you believe in Jesus. I believe that's where
2 the bias comes from, in part.

3 And also the fact, let me add this, that I
4 was being hometowned in that case. I'm not from
5 Cleveland. Cleveland is a very insular city. At
6 one point, the guardian ad litem in this case told
7 me that he would never let me bring my kids to
8 Florida because Florida is a corrupt place which has
9 no ethics and no values. And he would never let
10 these kids come to Florida. I wasn't even seeking
11 that. I was seeking better visitation. There is a
12 lot of bias there.

13 And my former wife happens to be -- her
14 maiden name, Stephanie Luck. Her family is very
15 famous in Cleveland. Her brother is Oliver Luck, a
16 former all American quarterback for West Virginia
17 and her nephew is Andrew Luck who probably is the
18 greatest rookie quarterback in the history of the
19 NFL. So there is a great bias there when Larry
20 Klayman is trying to take a Luck kid away,
21 basically, which I wasn't even trying to do.

22 Q But are you saying that the magistrate did
23 not find that you are engaged in inappropriate
24 touching?

25 A That's what he said, but the way he

1 phrased it, this does not mean Larry Klayman did
2 not. It was very clever. And he wanted to smear
3 me.

4 And unfortunately, Mr. Bohrer, you know,
5 you're an experienced trial lawyer that some judges,
6 not all, we have a really good judge here, thank
7 God, but a lot of judges wear their biases on their
8 sleeves and particularly in family court matters.
9 The Cleveland family court even by virtue of
10 Cleveland Plain Dealer, the newspaper, is a cesspool
11 of corruption. Money even changes hands from time
12 to time in that court.

13 Q The magistrate made a finding of
14 inappropriate touching and you appealed; is that
15 fair to say?

16 A Correct.

17 Q You appealed it to what court initially?

18 A The Ohio appellate court. I forget the
19 name of it.

20 Q And the Ohio appellate court talked
21 about -- it's called the Court of Appeals of Ohio;
22 does that sound right?

23 A Probably.

24 Q 8th Appellate District?

25 A I had an attorney. I had a challenged

1 my civil rights under color of state authority by
2 smearing me with what I alleged to be uncorroborated
3 false information that was leveled against me
4 because of my religion in part.

5 I'm not equating myself with Jesus Christ
6 but they went after him too based on his beliefs.

7 Again, I respect my faith, my background
8 and my religion but the Jewish high priests tried to
9 destroy Jesus Christ because of his beliefs. I'm
10 not Jesus Christ. Something that people do
11 throughout history is try to destroy people. I'm
12 not God.

13 Q If you look at page 85 of this
14 magistrate's decision, on page 85 going to 86, the
15 magistrate goes over what he believes are court
16 decisions criticizing you for your ethics.

17 A I'm not going to characterize what he said
18 or what was in his mind. If you want to read me a
19 particular section, I will respond to.

20 I've been a lawyer for 37 years. That's a
21 long time. I'm been a member of good standing of
22 the Florida Bar, the D.C. Bar and other bars for
23 that period of time except when I didn't pay my dues
24 in Pennsylvania where I went on administrative
25 suspension. It had nothing to do with ethics.

1 Three instances in 37 years are not particularly
2 great.

3 I might add, anybody who watched the O.J.
4 Simpson case, knows that Johnny Cochran who
5 successfully defended O.J. Simpson and Marsha Clark
6 and Chris Darden were sanctioned more than any
7 criticism of me in this case, in one case, okay.
8 The lawyers as you know who take strong positions
9 who zealously represent their clients, sometimes
10 buck up against judges who have certain preconceived
11 notions and biases.

12 I am not defensive of this. I'm proud
13 that I stood up to these judges. That's the reason
14 I started Judicial Watch. I saw among some portions
15 of the bench -- not this judge, thank God, in our
16 case and others -- that judges do wear their biases
17 on their sleeve and do things that harm ordinary
18 folk. I've written about this. I wrote a book.

19 Q Are you denying -- these judges -- I've
20 been a lawyer a long time myself and I've had to
21 taking aggressive stances myself. I haven't had
22 half a dozen judges say these things about me that
23 they say about you. In fact, I've had zero judges
24 say that about me.

25 A I'm glad. Can I take your deposition and