STATE OF MAINE
PENOBSCOT, SS.

OTTO SNOW,

Plaintiff,

vs.

ANDREW DAVIS,

and

DORA SMITH FAMILY REAL
ESTATE COMPANY, LLC c/o
BARBARA NICHOLAS and DEBRA
CONLEY,

Defendants.

SUPERIOR COURT
Civil Action
DOCKET NO. CV-2021-20

## REMOTE DEPOSITION OF:

## OTTO SNOW

Taken before Tammy M. Smith, Notary Public, in and for the State of Maine, pursuant to notice given, on **September 27**, **2022**, commencing at 1:04 p.m.

1	APPEARANCES
2	For the Plaintiff:
3	Christopher R. Largay, Esq. LARGAY LAW OFFICES, P.A. 293 State Street
4	Bangor, Maine 04401 207.947.4529
5	chris@LargayLaw.com
6	For the Defendant Andrew Davis: Kady S. Huff, Esq.
7	EATON PEABODY 80 Exchange Street
8	P.O. Box 1210 Bangor, Maine 04402-1210
9	207.947.0111 khuff@eatonpeabody.com
10	For the Defendant Dora Smith:
11	Samuel G. Johnson, Esq. NORMAN HANSON & DETROY
12	Two Canal Plaza P.O. Box 4600
13	Portland, Maine 04112 207.774.7000
14	sjohnson@nhdlaw.com
15	For the Defendant Debra Conley: Matthew K. Libby, Esq.
16	MONAGHAN LEAHY 95 Exchange Street
17	Portland, Maine 04101 207.774.3906
18	MLibby@monaghanleahy.com
19	
20	
21	
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1	STIPULATION	
2	(The attorneys participating in this	
3	deposition acknowledge that I am not	
4	physically present in the deposition room and	
5	that I will be reporting this deposition	
6	remotely. The parties and their counsel	
7	consent to this arrangement and waive any	
8	objections to this manner of reporting.)	
9	* * * *	
10	(It is hereby agreed by and between the	
11	parties that signature is not waived.)	
12	TRANSCRIPT OF PROCEEDINGS	
13	* * * *	
14	OTTO SNOW, having been duly sworn by the Notary	
15	Public, was deposed and testified as follows:	
16	EXAMINATION	
17	BY MR. LIBBY:	
18	Q. Good afternoon, Mr. Snow.	
19	A. Hi.	
20	Q. Can you state your full name for the record?	
21	A. Otto E. Snow.	
22	Q. Do you prefer that I call you Otto, Mr. Snow,	
23	or something else?	
24	A. Just call me Otto, that would be fine.	
25	Q. Okay. So, Otto, my name is Matt Libby, and I	

1	represent
2	MR. LARGAY: Matt, I'm sorry. There's a
3	witness here. I was expecting to ask him to
4	stay in the other room, it's just dawned on
5	me. Do you want me to do that?
6	MR. LIBBY: So John Huhn is there?
7	MR. LARGAY: Rob.
8	MR. LIBBY: Rob is a witness?
9	MR. LARGAY: Yes.
10	MR. LIBBY: Who's Rob?
11	MR. LARGAY: Last name how do you
12	spell your last name?
13	MR. SADLOWSKI: Sadlowski,
14	S-a-d-l-o-w-s-k-i.
15	MR. LARGAY: S-a-d-l-o-w-s-k-i.
16	Excuse me for just a second, Matt.
17	MR. LIBBY: Okay.
18	(Mr. Sadlowski left the deposition room.)
19	MR. LARGAY: Sorry about that. I was
20	literally paying attention to this computer,
21	and he's been so quiet, he didn't say a word.
22	I forgot he was still in the room.
23	MR. LIBBY: Yeah, no problem. So he's
24	now out of the room and the only people in the
25	room are you and Otto?

- 1 MR. LARGAY: That's correct.
- 2 BY MR. LIBBY:
- 3 Q. So, Otto, my name is Matt Libby, and I
- 4 represent one of the defendants in this case.
- 5 Her name is Debra Conley. Okay?
- 6 A. Okay.
- 7 Q. And you understand that I'm here to take your
- 8 deposition in relation to this lawsuit?
- 9 A. Yes.
- 10 Q. And you understand that you filed a complaint
- 11 against two other parties. Andrew Davis is
- one of those other parties, correct?
- 13 A. Correct.
- 14 Q. And the other part is Smith Family Real Estate
- 15 Company, LLC?
- 16 A. Correct.
- 17 Q. This lawsuit that you filed stems from a dog
- bite injury on or about April 15, 2018; is
- 19 that right?
- 20 A. Yes, that's correct.
- 21  $\mid$  Q. This happened at 31 Earle Avenue in Bangor?
- 22 | A. I speculate, yeah. I didn't check the
- 23 address. Chris has that.
- 24 | Q. All right. But it did happen in Bangor?
- 25 A. Yes, it did.

- 1 Q. So before I ask more questions about the lawsuit and your injuries, I just want to go 2 over a few ground rules. Chris may have 3 mentioned a few of those to you, but I want to 4 clarify what my rules are. And the first rule 5 6 that I have for you is to make sure that you 7 understand my questions before you try to give 8 a response. Okay?
- 9 A. Okay.
- Q. And if you don't understand my question, for whatever reason, will you tell me that?
- 12 A. Okay. Yeah.
- Q. Yes, okay. That will give me an opportunity to ask a question that you do understand.

  Okay?
- 16 A. All right.
- Q. The second rule that I have is to make sure
  you use verbal responses and not head nods or
  head shakes because everything we say is being
  typed down by the court reporter, Tammy.
- 21 A. Okay.
- Q. All right. So just make sure you give verbal responses so that it's clear for the record.
- 24 A. All right, yep.
- 25 Q. The final rule that I have is to be patient.

And sometimes I'm thinking of questions as I

speak, so it can take a little while to get

them out. Even if you think you know where

I'm going with a question, just try to let me

finish. Be patient and then provide an

answer, if you have one, so we're not speaking

over one another.

- 8 A. All right.
- 9 Q. If at any point in time you need to take a
  10 break, that's fine. You can let me know. The
  11 only thing I would ask is that you answer any
  12 pending questions, if there is a question
  13 pending. Does that work?
- 14 A. Yeah, yeah.
- Q. Any reason that you can't give truthful responses to my questions today?
- 17 A. No.
- Q. Are you on any medications that would impair your ability to give truthful answers?
- 20 A. No.
- Q. Are you taking any prescription medications today?
- 23 A. I'm taking my blood pressure pill.
- Q. Do you take any other prescription medications besides the blood pressure medication?

- 1 A. Let me see. Diazepam, two milligrams, when I
- 2 need them, so I don't wind up in the ER; also,
- 3 Zoloft concentrate.
- 4 Q. What is the diazepam for?
- 5 A. Panic attacks, PTSD, meltdowns.
- 6 Q. Did you say meltdowns?
- 7 A. Yeah, like, I get too overloaded. So I
- 8 don't -- because I don't want to have to wind
- 9 up in the ER.
- 10 | Q. How long have you been prescribed diazepam?
- 11 A. Let me see. I guess possibly for a year or
- 12 two. I can get the dates for you, the exact
- 13 dates.
- 14 Q. What about the Zoloft concentrate, what's that
- 15 prescribed for?
- 16 A. Depression and constipation.
- 17 Q. How long have you been prescribed Zoloft?
- 18 A. Oh, I've been taking it now for, oh, about a
- month.
- 20 Q. You said it's concentrate. What does that
- 21 mean? What kind of form does that come in?
- 22 | A. It's a liquid so I can add it to, oh, a
- 23 beverage.
- 24 Q. Is there a reason you just don't take the pill
- 25 form?

- 1 Α. Yeah, I'm really sensitive to medications. 2 It's a nightmare trying to figure out doses.
- Do you know when you were first diagnosed with 3 Q.
- depression? 4
- 5 Oh, I don't know. I think it probably goes Α. along with the PTSD, but I think more 6 7 recently. I'm not sure. I'd have to look at 8 my records, but it pretty much goes along with 9 my PTSD.
- Were you ever diagnosed with PTSD? 10
- 11 Α. Yeah, about 30 years ago.
- 12 So would it be fair to say you've been Q. 13 suffering with depression since you were diagnosed with PTSD? 14
- I'm not sure. I'll have to check my records, 15 Α. 16 but I think it was in June that I had an 17 evaluation done, and instead of it being just 18 PTSD, it's chronic severe PTSD with 19 depression. But prior to that, it had been 20 just the diagnosis of the PTSD.
- 21 So you think that you're diagnosis of PTSD was 22 elevated in June of this year?
- No. That's when I had a whole evaluation of 23 Α. 24 all -- a majority of my documentation done so 25 we'd have kind of a synopsis to look at.

- Q. When you say we would have a synopsis to look at, who are you -- who are you referring to?
- 3 A. Everyone. It's going public.
- Q. Your PTSD and the information about your medical treatment is going public?
- 6 A. Yes, it is.
- 7 Q. What do you mean by that?
- 8 A. It's going to be going up online. I'm going to be giving talks on it.
- 10 Q. Why are you going to be giving talks on it?
- 11 A. After the dog attack, it opened up my traumas,
- and it hasn't stopped since then. And they're
- coming out in a stream. Every night at 2:00,
- they start coming out, and we can't stop it.
- So I'm going public with all this, all my
- trauma, all the people involved, everything.
- 17 Q. Okay. What are all your traumas?
- 18 A. You'll have a link to it. I'm not going over 19 it here right now.
- 20 MR. LARGAY: You've got to answer his
- 21 questions if they're -- that's a fair
- 22 question.
- 23 THE WITNESS: What? Are we going to be
- 24 here for five hours?
- 25 A. I survived an explosion at  $1\frac{1}{2}$  years old, two

1 of my friends were burned alive in front of 2 me. Let me see. Would --3 MR. LARGAY: Take your time. THE WITNESS: Okay. 4 5 MR. LARGAY: If I may coach him, I'm just 6 trying to make sure you get an answer to the 7 question, Matt. MR. LIBBY: Sure. 8 9 MR. LARGAY: So take your time and 10 just go one -- through one. His question was 11 about the traumas, I believe. 12 In 1983, the infamous B.D. Hughes, M.D.; the Α. 13 infamous M.J. Fontana, M.D., drugging and 14 sexually assaulting women across the city. BY MR. LIBBY: 15 16 Otto, you're going to have to slow down here. Q. 17 So let's just take one at a time. 18 Α. Okay. 19 You mentioned that something traumatic Q. 20 happened when you were 1½ years old. What was 21 that again? 22 A. A gas explosion. 23 Q. Were family members hurt in that? 24 A. I was standing next to the building and it 25 exploded.

- Q. <u>Was -- were you hurt?</u>
- 2 A. I was knocked to the ground.
- 3 | Q. Okay. Was any member of your family hurt?
- A. Someone -- my mom raced across the yard and scooped me up. It was the -- the windows and
- 6 doors blew out of the building.
- 7 Q. Okay. So did you suffer any injuries that 8 required hospitalization?
- 9 A. No, but every trauma I get, it opens these

  10 things up, and it takes -- it took about a

  11 decade to calm them down, every time I get a

  12 trauma.
- 13 Q. Okay.

- A. I get horrendous nightmares of friends burning alive.
- Q. You were 1½ years old at the time of the

  explosion. Is it your testimony that you have

  actual memories from the time period that you

  were 1½ years old?
- 20 A. I even have video.
- 21 | Q. No -- well --
- 22 A. I remember -- oh, excuse me.
- Q. So just -- I want you to pay attention to my question. You might -- you might have video; so that's a fair point.

Putting aside, like, pictures and video, 1 do you have an actual recollection of 2 experiencing that moment? 3 A. Yeah. I have, oh, memories of before that, 4 going in the building, being with the people, 5 my friends, having cookies with them. 6 7 Q. You mentioned that you saw two friends burned alive. When did that happen? 8 <u>Let me see. Jul</u>y 1, 1958. 9 Q. How did those two friends burn alive? 10 A. Well, with fire. They were engulfed in 11 12 flames. One of them died, and the other one 13 was, oh, hospitalized for months. Q. And that other friend who was hospitalized for 14 months died, too? 15 No, she didn't. 16 Α. 17 Okay. So one friend died? 18 Α. Yep. How old were you? 19 Q. 20 One and a half. Α. 21 Was it the same gas explosion? Q. 22 Α. Yeah, yep. 23 How old was that one friend who died? How old Q. was that friend? 2.4 25 They were in the their sixties. One of them Α.

- had just had a heart attack, and they were in the cottage next door to where I lived with my grandma.
  - Q. Then you mentioned 1983 with several acronyms that I wasn't following.
- 6 A. Okay.

- 7 Q. What are you speaking of, generally?
  - A. I witnessed the brutal torture of my mother, the drugging and torture of her. Other women were being drugged and sexually assaulted, and the authorities wouldn't do anything about it.

    And my mother was crippled. So I have -- the practitioners in Florida were very, very cautious when I'd go into medical environments.
  - Q. Were the people who perpetuated those acts put in jail?
  - A. One of them was arrested for kiting over
    \$10 million in money and then was later
    arrested, and he was convicted of that. Then
    he was arrested for counterfeiting money, and
    he was convicted. He served time on both of
    them. B.D. Hughes was arrested for multiple
    counts of sexual assault, finally, and he was
    dead before court.

- Q. All right. So -- and did your mom survive this incident?
- $3 \mid A$ . Yes, she did, but she was -- it crippled her.
- Q. Literally, she was -- she became physically incapacitated somehow?
- A. Oh, four-point restraints, given drugs against
  her will, given electric shocks against her
  will.
- 9 Q. What is her -- yeah, what is her name?
- 10 A. Marie Snow.
- 11 Q. Is she still alive?
- 12 A. No, she isn't.
- 13 Q. When did she pass?
- 14 A. Oh, I think it was 2007.
- 15  $\mid$  Q. Where was she living when she passed?
- 16 A. In Florida; Spring Hill, Florida.
- Q. When you were diagnosed with PTSD roughly

  30 years ago, was that the basis that you were

  put on social security disability?
- A. It was, oh, a trauma in 1985. And I didn't

  know what PTSD was at the time, but I think it

  was in 19 -- 1994 that I was finally given a

  diagnosis. But I also do have a diagnosis
- back from, oh, I think, oh, 19 -- 1986, I
  think. And all these documents can be

- 1 provided to you.
- 2 Q. What was the reason for the -- or the trauma
- 3 in 1985 that ultimately led to your PTSD
- 4 diagnosis?
- 5 A. It was a home invasion. It was a shakedown
- 6 for money. Myself and my family were
- 7 terrorized.
- 8 Q. Were you hurt?
- 9 A. Yeah, I was totally shattered. I couldn't do
- 10 anything.
- 11 | Q. Were you physically hurt?
- 12 A. No, no, but it was really horrendous.
- 13 Q. Have you ever served in the military?
- 14 A. No.
- 15 Q. Have you ever given testimony, like we're
- doing today, under oath?
- 17 A. No.
- 18 | Q. Did you graduate from high school?
- 19 A. Yep.
- 20 Q. Where?
- 21 A. Bishop Guertin in Nashua, New Hampshire.
- 22 | Q. Did you attend college?
- 23 A. Rivier College and also UNH.
- 24 Q. Did you graduate?
- 25 A. No.

Q. Why not?

- 2 A. I get severe allergies, and I call it my
- 3 insomnia season. It's allergetic rhinitis.
- 4 So I just went into MIT libraries and UNH
- 5 libraries and read and studied and taught
- 6 myself chemistry.
- 7 Q. Did you work at all before going on to social
- 8 security disability?
- 9 A. Yep. I worked in several places before that.
- 10 Q. So you had employers where you were an
- employee?
- 12 A. Yep.
- 13 Q. And what kind of jobs did you hold?
- 14 A. Let me see. I worked in the hydraulics
- industry. Let me see. What else? I worked
- in the electronics industry, also, oh,
- defense, defense of a company, weapons
- 18 systems.
- 19 Q. So were you working on an assembly line doing
- 20 manufacturing?
- 21 A. No. Generally, I did stockroom.
- 22 | O. Stockroom?
- 23 A. Yep, and hydraulics, I did deliveries.
- 24 | Q. So you went on social security disability in
- 25 1994?

A. Yep.

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- 2 Q. And --
- 3 A. It was -- it was SSI they gave me.
  - Q. Okay. So that's different. Did you get supplemental security or it's -- SSI and SSDI are two totally different things. Is it your
- 7 recollection that you were given SSI?
- 8 A. Yeah. I have full documents. Chris can provide you with all of it.
- Q. All right. So you said in your answers to the interrogatories served by the landlord -- and I'll refer to the landlord as Dora Family -- or Dora Smith Family Real Estate Company. Do you understand that?
- 15 A. Yes.
- Q. So when I say landlord, that's the party that
  I'm referring to.
- In answers to interrogatories that were
  served by the landlord, you said you lost your
  disability benefits in 2008 because of an
  inheritance from your mother?
- 22 A. That's correct, yep.
- 23 Q. Okay. So how much did you inherit?
- A. Oh, I'm not sure. I'd have to check. I can't remember. Several hundred thousand dollars,

- 1 and then I put it in the market.
- Q. Was it more or less than \$500,000?
- A. I'm not exactly sure. Probably right around there, probably right around there.
  - Q. Did you have any training in investments or securities when you put that money in the market?
- 8 A. No, none at all.

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- 9 Q. Is any of that money left?
- 10 A. No, because after the dog attack, everything
  11 pretty much came apart.
- 12 Q. What do you mean it came apart?
- A. Well, I'm getting horrendous nightmares, sleep

  problems. The traumas just keep running and

  running and running. So trying to get

  anything going, I've got to kind battle with

  all of that stuff. And --
- 18 Q. So -- sorry, go ahead.
- A. And, you know, it's just streaming out of me now, the traumas.
- Q. How is that impacting the money that was left to you by your mom and invested in the market?
  - A. Because I was taking the money and I was, oh -- restored the late Judge Woodcock's
- 25 house. And it was being set up -- one room

was going to be my lab, in another room, I had my library. And pulling all of this together, I have to have folks around me and try to get things done, and it just became so much of a challenge. And then trying to get medical care and -- you get so much on your plate, you can't handle any of it.

- Q. You mentioned the late Judge Woodcock. Were you -- who were you referring to?
- A. He was a judge in Bangor and he had passed away, and his grandkids or his kids, I guess, inherited the house. And it was the perfect location, and I thought, well, let's get the prototype here, let's do it here, this is a beautiful area, the State wants tech, the area needs tech. So I thought this is perfect right here.
- Q. And Judge Woodcock was hiring you to do a renovation to a house that he owned?
- A. No. He passed away, and his children and I guess his grandchildren or something inherited the house, and they sold it to me.
- Q. All right. What's the address of the house?
- A. Leighton, L-e-i-g-h-t-o-n, Street, and that's in Bangor.

- 1 Q. Do you still own the house?
- 2 A. Yes, I do.
- 3 | Q. How much did you buy it for?
- $4 \mid A$ . Oh, I think I paid, oh, 99 for it, 99K.
- 5 Q. Do you currently live there?
- 6 A. Yes, I do.
- 7 | Q. Do you live alone?
- 8 A. Yes, I do.
- 9 Q. Have you ever been married?
- 10 A. No.
- 11 | Q. Do you have any children?
- 12 A. No.
- 13 Q. Do you have any siblings?
- 14 A. No.
- 15 | Q. You were an only child?
- 16 A. Yep.
- 17 Q. Do you own any other properties besides the
- one at \ Leighton Street?
- 19 A. No, that's it.
- 20 Q. Did you pay cash for that property?
- 21 A. Yes, I did.
- 22 | Q. Did you have to divest some of your stocks or
- 23 did you have that money in the bank?
- 24 A. Let me see. Well, it took several years, you
- 25 know, to, oh, put into the project. So at

- times, I would sell stocks, and then I flew
  into Florida and sold that house and then put
  that money that I sold the house in Florida
  into the house up here.
  - Q. So getting back to the benefits, you were informed that your benefits would be terminated after you inherited money from your mother?
- 9 A. Yep, and my publishing business was doing a profit; so between both of them, the SSI was terminated.
- Q. So it's your understanding that you were not receiving SSDI, which is social security disability income?
- 15 A. Yep.

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- 16 Q. That means you were not getting that, right?
- 17 A. No, I was getting SSI.
- Q. Okay. Understood. Have you ever received SSDI in your life?
- A. No. We challenged it, and they put down
  adjustment disorder. I guess that's a sham
  that's regularly done when people have PTSD so
  they can screw us out of SSDI. I've got the
  documentations. You folks can look it up if
  you want.

- 1 Q. What's the name of your publishing business?
- 2 A. It was Thoth Press, T-h-o-t-h Press.
- 3 Q. When did you start the business?
- 4 A. I'm just trying to think. Maybe 1998.
- 5 Q. Is it still active?
- 6 A. No. I closed it to come up here and was going
- 7 to reopen it.
- 8 Q. What do you receive currently for income?
- 9 A. Nothing.
- 10 Q. What government benefits do you receive?
- 11 A. None. Medicare.
- 12 Q. Any other benefits?
- 13 A. No.
- 14 | Q. So what -- how are you surviving day-to-day in
- terms of paying for food and homeowners
- insurance and things like that?
- 17 A. I had to take an equity loan from the bank.
- 18 Q. How much?
- 19 A. I'm not sure. I think it's maybe one-twelve,
- 20 something like that.
- 21 | Q. When did you take the loan out?
- 22 | A. Oh, I'm not sure. I think it was a couple
- years ago.
- 24 | Q. What's the value your stock portfolio?
- 25 A. Probably about 3,000 bucks.

- 1 | Q. How much money do you have in the bank?
- 2 A. Oh, I owe money.
- 3 Q. Do you have any checking or savings accounts?
- 4 A. Yeah. I think there's, like, three grand,
- 5 maybe, because I had to borrow money from a
- friend.
- 7 | Q. You allege in your answers to the
- 8 interrogatories served by the landlord that
- 9 you made about \$36,000 a year from stock
- market investing between 2008 and 2018; is
- 11 that right?
- 12 A. Yep, approximately, yeah.
- 13 Q. What happened after 2018?
- 14 A. Well, I had to sell it out, and I can't get
- anything going here.
- 16 Q. You had to divest your stock investment after
- 17 2018?
- 18 A. Yeah, yeah.
- 19 Q. Why?
- 20 A. Well, that's the money I was using to try to
- 21 get stuff going here.
- $22 \mid Q$ . In 2018, what was the value of your portfolio,
- 23 roughly?
- 24 A. I'd have to look, I would have to look.
- Q. Was it more or less than \$100,000, if you can

26 1 say? 2 Less, less. Α. More or less than \$50,000? 3 Ο. Oh, it was under \$50,000. I'd say it's 4 Α. under probably about 30 at that point. 5 All right. So what was your plan to sustain 6 Q. 7 yourself financially once that money ran out? Well, I wasn't looking at it this way. I was 8 Α. 9 trying to get the businesses going here. And instead -- you know, it was, like, multiple 10 11 things I had to deal with. You know, you 12 can't find medical up here. I had to scurry 13 to go all the way to Portland, work with 14 medical folks outside the State of Maine. You know, I finally had so many things that I was 15 16 trying to handle, I just said, you know, this 17 is it, you know, I've got to pack up 18 everything and get to a place that's more receptive because I don't want to have to 19 20 travel, oh, two hours to see a specialist or 21 wait, you know, months to see a doctor.

- 22 Q. Where were you living in 2018?
  - A. Up here in Bangor.

- 24 Q. What was your address?
- 25 A. XXXXX Leighton.

- 1 Q. Sorry, can you remind me again when you bought
  2 that property?
- A. Oh, let me see. I'm not exactly sure. When was it? I think it was 2016.
- Q. Have you ever been diagnosed with a mental health condition other than PTSD and depression?
- A. Yeah, I was diagnosed with -- what is it -
  gutism, high-functioning autism. I had

  defensive diagnoses being done up here, and

  they were gaslighting me.
- Q. What were these defensive diagnoses that were being made?
- 14 A. Schizoaffective.
- Q. So one of your providers diagnosed you with schizoaffective disorder?
- A. Yeah. Medical here is a crap bucket. It's

  cut-and-paste fraud, and I can spot it and I

  see it, and I'm not going to tolerate it.
- Q. So to -- sorry -- to answer my question,
  someone -- a provider in Maine did diagnose
  you with schizoaffective disorder, right?
- A. Yep, and she's going, oh, before the board

  of -- what is it -- occupational -- Office of

  Professional and Occupational Regulation.

- 1 Q. Yes. Okay. What's her name?
- 2 A. What is it? Wiktor, M.D. No, Wiktor, PhD.
- 3 | Q. Do you know how to spell that?
- 4 A. W-i-k-t-o-r.
- 5 Q. Is she out of Bangor?
- 6 A. No, near Portland.
- 7 | Q. Do you know what practice she's at?
- 8 A. No. I think she runs her own.
- 9 Q. <u>So you disagree, obviously, with her diagnosis</u>
  10 of schizoaffective disorder, right?
- 11 A. Oh, most definitely.

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- Q. Are there any other diagnoses that have been made by medical providers that you disagree with?
- A. Oh, there's a slew of them. Psychiatry is not a well-defined science. So -- but I can have, oh, Mr. Largay provide you with all of that.
  - Q. Okay. From -- as you as you sit here today, from your own memory, can you list off the diagnoses that have been made that you disagree with?
- 22 A. I don't know. I've had so many. You can go
  23 to one doctor and get -- oh, it's like -24 MR. LARGAY: Try to answer his question

more directly if you can. Okay?

1 THE WITNESS: Okay. 2 Let me see. BY MR. LIBBY: 3 You don't have to remember them all, but just 4 Ο. 5 maybe a few of them that you can recall? 6 Α. Okay. 7 MR. LARGAY: Matt, I'm going to back the 8 camera up so you guys can see me, too. I resist coaching, and I want you to be able to 9 see what I'm trying to help focus --10 11 MR. LIBBY: Yeah, I mean, I'd actually 12 prefer -- I have no problem with what you're 13 doing right now, Chris. And I'd like to keep it closer just, yeah, so I can see him. 14 MR. LARGAY: Any time I'm going to say 15 16 anything, I'm just speaking up, that's all. 17 MR. LIBBY: Sure. 18 MR. LARGAY: It's just kind of odd that I'm not on camera, but I want to assure you 19 20 I'm not coaching him, I'm just trying to help 21 Mr. Snow understand and get a response to your 22 questions. And, I -- you know, sometimes

other people don't want me to even -- you

know, prefer I wouldn't be in the room.

people would like me to interfere and do more,

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1 anyways, it's your deposition, you do it how 2 you want, and I'll help you any way I can. 3 And if shutting up does that, then that's what I'll do. Okay? 4 5 MR. LIBBY: Yeah, no, thanks. Ι 6 appreciate that. 7 MR. LARGAY: Okay. BY MR. LIBBY: 8 9 So, Otto, do you remember any other diagnoses besides schizoaffective disorder that you 10 11 disagree with? 12 Depression, I think, possibly. I mean, Α. 13 there's quite a slew of them. Oh, what's that -- oh, borderline, that's a good one. 14 That tends to be tossed at folks that don't 15 16 agree with these people. Let me see. What 17 are some other ones? 18 Q. Is that borderline schizophrenic? 19 I guess borderline, if you don't agree Α. 20 with them, you're a borderline. 21 So I'm going to transition here. 22 Α. Oh, anxiety. 23 All right. Q. 24 Α. Several -- several of them spotted the 25 dyslexia, too, but I don't have an actual

diagnosis in medical records.

- Q. Are you claiming that anything related to the injury from the dog interferes with your ability to sustain yourself financially, in other words, make money?
- A. Oh, yeah, opening up these traumas is opening up Pandora's box. It took several decades to get them manageable.
- Q. All right. So we talked a little bit about those, and we can talk about them more. Let me ask a different question.

Is there anything from this incident with the dog that physically interferes with your ability to make money, so a physical injury?

A. Yeah, all of these things attack my muscles.

I can't sleep at night. At 2:00 in the

I can't sleep at night. At 2:00 in the morning, I wake up -- for two years -- with the screaming nightmares; so I'm not sleeping good. It attacks my muscles in such a way that I go into a fetal position. For two years I have to put a pillow between my legs and two straps because I tighten up so bad. I have to have people bend me back into shape from this. I have to take real hot tubs and put myself with a hot compress, wet compress

- to loosen parts of the kinetic chain. I get

  spasms where I shake, and I have to have

  someone hold me to stop shaking it gets so

  bad. It's intense, it's real intense.
  - Q. And all of these things that you're talking about, they stem from the trauma, right?

- A. Oh, yeah. As far as my face, it's constantly pulling on my face any time that I try to eat or talk or move my mouth. You know, it's always there, and that doesn't help because it opens up traumas again because I think of the attack.
- Q. You have some ongoing symptoms from the facial injury even though the laceration is healed?
  - A. Oh, yeah. It's -- two inches of my lip were torn off from the muscle.
- Q. What are those ongoing symptoms that you have around your mouth?
  - A. Well, they -- Dr. Campbell did the surgery on my face, and he had to remove -- there was a piece of my lip and muscle, and that had to be removed because it was just hanging off of my face, and he also mentioned that there was another piece that was missing. And so it's constantly tight, it's constantly tight. It

- constantly pulls. I mean, all the time I can

  feel it. When I eat and I try to close my

  mouth, it pulls to the right. I don't have

  the strength in the right side of my mouth.

  I'm concerned now about giving talks, how

  that's going to affect me. I have a lisp. My

  smile, my whole face is crooked.
- Q. Do you mind removing your mask for two seconds?
- A. No, I'm not going to remove it. I'm not going to remove it unless I have a PhD psychologist here with me at this point.
- 13 Q. Okay.
- 14 A. You'll be provided with the medical records.

  15 I have serious PTSD.
- 16 Q. Right.

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- A. This is rough for me coming in here. So I

  appreciate -- Chris will provide you with any

  photographs you need. I have to be around -
  you know, in an environment where I feel very,

  very comfortable.
  - Q. So I just want to make sure I'm understanding your objection. Is removing the mask going to cause PTSD because you'll have to see your facial injuries?

34 1 Α.  $N \circ .$ Whatever --2 MR. LARGAY: Excuse me. Listen carefully to Matt's questions. These are all legitimate 3 questions. 4 5 THE WITNESS: Great, great. Yeah, I'm 6 trying to work with you guys. 7 MR. LARGAY: I understand, okay, but just listen to the question, if you can, and then 8 9 try to answer the question. Okay? THE WITNESS: Yeah. Okay. 10 11 Psychologically, I'm very sensitive to it Α. 12 right now, and I don't feel comfortable with that and -- but Chris -- I can understand that 13

right now, and I don't feel comfortable with that and -- but Chris -- I can understand that you do want photographs of this, but -- which I -- I can understand and I can respect that.

I just would feel a little bit more comfortable if it -- someone were to take the photographs, and then afterwards, I could get away from all this because it's a little intense on me. Okay?

21 BY MR. LIBBY:

- Q. Sure. I can understand and appreciate that.
- 23 A. Yeah.

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Q. Do you have -- I was just trying to figure out, do you have the mask on right now for

purposes of COVID safety requirements or --

- A. I was also exposed to COVID. So -- but I'm still very sensitive as far as my mouth. I can appreciate what you're saying, and I will make sure that Chris gets some good photographs for you.
- Q. Okay. Great. I appreciate that.

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Is it fair to say that you're not having
any pain in your -- in the area of the
laceration?

- A. Well, it constantly pulls. It's constantly tugging on my face.
- Q. Sure. And I understand that you testified to that, but I'm trying to figure out whether or not it causes actual pain where it hurts.
  - A. No, I do not have actual pain.
  - Q. You said that it causes you to speak with a lisp. Have you been speaking with a lisp at all during this deposition?
- A. Well, I can hear it, you know, because it

  just -- I can hear it in there, and some other

  people have noticed it and brought it to my

  attention. So I figure that, you know, I'd

  mention that.
  - Q. You want to go out and give talks. Have you

ever given talks before?

- A. Yes, I have, yeah. And I was hoping to come up here and give talks, and I think that's going to be bad for a while until I can, you know, get a little more attention onto, you know, how it's affected my speech and how it's also -- my face is all crooked, how it's affected that. You know, Dr. Campbell, when I mentioned it to him, he says that there's no way that -- he says we just can't return to the flesh and the muscle that was torn from my mouth. And he did a very good job. I guess he's considered one of the best cosmetic surgeons in the area.
- Q. It looks like you have a long beard; is that right?
- 17 A. Yes, I do.

- 18 Q. Do you also have hair over your upper lip?
- 19 A. Yes, I do.
- Q. So is it fair to say that you can't really
  see -- if there is a scar, you can't really
  see it because of your facial hair?
  - A. Yeah, I don't feel very comfortable showing this right now. I'd have to talk with, oh, a coach, psychologist, someone who could give me

a little bit of support before I go and -- and talk with Mr. Largay. I'm very sensitive about it. I'm just very, very sensitive at this point.

MR. LARGAY: Matt, if I can jump in for a moment.

MR. LIBBY: Sure.

MR. LARGAY: Otto, would you feel comfortable if after the deposition today I took some photos on my camera phone and then sent them?

THE WITNESS: That would be fair.

MR. LARGAY: Okay.

THE WITNESS: I've just got to de-stress

for a while because it will be -- all these

traumas will spin in my head until I can get

away from it.

18 BY MR. LIBBY:

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- Q. So let's transition to the actual incident where you got hurt by this dog called Piper, right?
- A. Yeah, the pit bull.
- Q. Okay. So in your own words, just walk me through how it happened.
  - A. Okay. Let me see. I have a map so I could

1 see if I could get this thing --MR. LARGAY: You didn't show it to me. 2 So let me look at it. 3 THE WITNESS: It's just a layout. 4 MR. LARGAY: For all counsel, it appears 5 6 to be a printout, dated September 26, 2022, 7 1:46 p.m.; so it was yesterday afternoon. And 8 it looks like a single page of Google Maps 9 with the -- let me see. Is Earle Street on here? 10 11 THE WITNESS: Yep. 12 MR. LARGAY: So basically I'll show it to the camera so you guys know exactly what he's 13 looking at or what he's referring to. 14 15 Don't look at it until they ask you to, if they do. Okay? 16 17 THE WITNESS: Okay. 18 MR. LARGAY: This is a -- it's just a printed 8½-by-11 off Google Maps and, let me 19 20 see, this is Earle Avenue here, and this is 21 Broadway. So Tri City Pizza is right there, 22 and the old redemption center, and then the 23 house is one of these. That one, I think. 24 (Exhibit 1, Google Maps Printout, was 25 introduced.)

MR. LIBBY: Yeah, sure. Okay. If we're going to -- if he's going to be referring to it, why don't we just go ahead and mark that as Deposition Exhibit Number 1.

MR. LARGAY: Okay.

MR. LIBBY: All right. And, Chris, you can email that to Tammy and everybody afterwards.

MR. LARGAY: Okay.

## BY MR. LIBBY:

- Q. So you can use the map if you want if it helps you tell your version of the incident. Or you don't have to use it. It's up to you. But walk me through what happened that day and how you got hurt.
- A. Okay. I just need it so I know the referenced streets. My friend, John, and I were walking on Warwick -- Warwick Street, which goes into Earle Avenue, and then we were walking on Earle Avenue to go get a pizza at Tri City Pizza. And as we were walking along, we were probably -- oh, I think it was Princeton Street, approximately Princeton Street. We were walking on Earle, and there was Princeton. We could see a dog running in the

1 street in front of us coming out of a driveway. It didn't have a leash on. 2 3 And John and I were walking in the street. Little City (technical interference) 4 people going for walks, walking in the street, 5 instead of on the sidewalk so we can talk with 6 7 each other. 8 MR. LARGAY: Little City is like a 9 neighborhood area, it's so-called Little City 10 in Bangor. 11 MR. LIBBY: Okay. Tammy, did you get 12 everything that you needed on that? 13 THE REPORTER: There was a little part that he -- when he moved forward, he kind of 14 broke up a little bit. 15 MR. LIBBY: Yeah. 16 17 THE REPORTER: In between John and I were 18 walking in the street, it got a little 19 distorted, and people going for walks, walking 20 in the street instead of walking on the 21 sidewalk, it got a little distorted. So I 22 don't know what he said in between that. 23 THE WITNESS: Do you want me to repeat 24 that? 25 MR. LIBBY: If you want to. I mean, we

can just have him state it over again, Tammy, if that's easier, rather than trying to fill in the blanks there.

THE REPORTER: Yeah, we might want to do that.

6 BY MR. LIBBY:

- Q. So, yeah, just say that again -- state that again, please.
- A. We walk in the streets instead of the sidewalk because the sidewalks are kind of small, and if we're going to talk, it's easier walk in the streets. So, generally, a lot of the people in Little City walk in the street. And we were walking towards, oh, the residence of Mr. Davis, and the dog was running into the street without a leash and running back in and then running in the yard without its leash.

And we stopped and just small talk with Mr. Davis, you know, That's a nice dog, you know, How old is the dog; and from there, we kept walking. I glanced back, and it looked like he was putting the dog on a leash. He was in the driveway, and we kept walking. And I turned around and I thought he was in the street with the dog, taking the dog for a walk

or -- the dog was really excited. Even in the driveway, it was very excited. So John and I just kept walking. We were going to go get some pizza. John stopped and he turned, looking back. And I stopped and I turned, and I got hit by the dog.

The dog lunged at me and hit my face so hard I thought I got hit by a baseball bat.

The blood came gushing out of my face. I was screaming. I staggered and fell onto the yard as we were in the street. I covered my face.

I could see the blood all over my hands, and I was screaming. And then I heard someone say to me, My dog never did that before, my sister is a nurse.

And at that point, I stood up and yelled at him, oh, Wet compress, crushed ice now.

And he ran into the house. He came back out, a woman came out and ran back in and then came running out with a wet face towel with crushed ice. Then I pressed it on to my -- oh, where the dog had ripped my lip off, and I said, Get me to the hospital now. And I was -- it was incredible.

She went in and got her keys, and I got

into the car. John was next to me, and we started going over there. He says, We're going to St. Joseph's Hospital, and I said to her -- I said to him, John, do you have a gun?

And he says, We're in Bangor, we're in Bangor, we're in Bangor, right.

And I got into the hospital, and I was just covered in blood. And Mr. Davis was sitting in a chair, and I thanked him. I said, Thank you for bringing me over here.

And he said to me, he said -- what was it? I don't -- I don't know if I should have helped you. And I says, What? And he says, I'm not sure if you're on my side. And I says, You've got to remember, it was your dog on my face.

And any time I tried talking with the police or the doctors, he kept on, oh, interjecting and interrupting us and, It was an accident, it was an accident. And I'm concerned about the meat hanging off of my face, the blood. I didn't even see, you know, what the -- what it had done. I just knew that I had been severely damaged.

And they got me into the doctor and

1 started working on me. They snipped a piece 2 of my face off because it was just hanging 3 there. They cleaned the blood off of me. And I asked Mr. Davis to take some photographs and 4 5 I asked John to take photographs. And one of 6 the doctors said to me that they had called 7 Dr. Campbell in because they were going to 8 rush me over to EMMC for surgery, and they 9 were reassuring me that he was a very, very 10 good surgeon. It was -- oh, it was 11 horrendous.

- Q. Can I stop you there, Otto?
- 13 | A. Yep, yep.

- Q. So I want to drill down on some of the things
  you told me here. And you testified that you
  and John were walking in the street when you
  initially saw the dog, Piper, right?
- 18 A. Yep.
- Q. And we understand that this dog is owned by Mr. Davis; is that right?
- 21 A. Yeah. It was -- it says in the literature 22 that he -- that I read that it is his dog.
- Q. All right. And did you see anybody else with
  Mr. Davis when you --
- 25 A. No, I did not. No, I did not.

- Q. All right. I just --
- A. I just saw who he said was his sister or his
  mother or he said it was his sister who was
- 4 the nurse.

- Q. But in terms of when you were interacting with him, no one else was with him, it was just him
- 7 and the dog?
- 8 A. Yes, that's correct.
- 9 Q. And then after you got hurt, you saw another 10 person, a woman come out to help?
- 11 A. Yes, that's correct.
- Q. So you testified that you stopped and had some small talk with Mr. Davis?
- 14 A. Yes, yes, that's correct.
- Q. When you had some small talk with him, were you still on the street or were you --
- 17 A. Yes.
- Q. Okay. Then it's your testimony that you kept
  walking down the Street, right?
- 20 A. Yes, that's correct.
- 21 Q. And when you were having the small talk with
- Mr. Davis, was the dog on a leash?
- 23 A. No, it was not.
- 24  $\mid$  Q. Was Mr. Davis holding the dog in any way?
- 25 A. It was running around him.

- Q. But is it fair to say the dog was under voice control at that time?
- A. I have no idea. All I know is that the dog was running around him.
  - Q. So you continued -- after the small talk, you and John continued walking down the street?
- 7 A. Yes.

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- Q. And about how far down the street did you make
  it until you were injured?
- 10 A. Oh, I'm not exactly sure, 20, 25 feet,
  11 something like that.
- Q. When the -- and you said you had turned around
  and you thought you might have saw or seen

  Mr. Davis putting the leash on the dog?
  - A. It looked like that. He was in the driveway.

    You know, I wasn't sure -- it looked like he
    was putting something on his collar. He was
    doing something with his collar. So --
- Q. When the you turned and you were struck by the dog, was the dog on a leash?
- 21 | A. I have no idea.
- 22 Q. Did you see Mr. Davis at that time?
- A. I thought he was on the street behind me, but

  it wouldn't make any sense because if he was,

  oh, behind the dog and the dog lunged at me,

- common sense, you'd pull -- you'd pull the
  leash. So I don't know exactly where he was.

  I thought he was behind the dog, but maybe the
  dog got out of his control. I have no idea.

  All I know is when I turned around, I got
  nailed by that dog. I did not bend down or
  anything.
  - Q. When you were, as you say, nailed by that dog, you were in the public street, right?
- 10 A. That's correct.

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- 11 Q. You were not on the property owned by the landlord?
- 13 A. No, I was not.
- Q. When you were hit by the dog, do you know if you were bit or was it more like a pressure wound?
- A. I had no idea. It felt like a baseball bat hitting my face and blood gushing out. I wasn't trying to figure anything out. I was staggering and fell into the front yard.
  - Q. What about when you visited the hospital and treated with your doctors in the days after the incident, did they ever tell you it looked more like a bite or a pressure cut?
  - A. The dog bit me and ripped the flesh off of my

1 lip and took the muscle around my mouth. 2 Q. And what makes you say it bit you as opposed to maybe just like head-butting you or 3 something like that? 4 Because the -- my lip was torn right off of my 5 Α. 6 face. 7 Q. Let me -- you understand that Mr. Davis has given testimony under oath, right? 8 9 Α. Yes. 10 All right. So I'm going to represent to you Q. what Mr. Davis testified to and ask you to 11 12 answer questions, assuming that I've 13 accurately represented his testimony, and subsequently --14 15 MR. LARGAY: Matt, we've been going for 16 about an hour. I'm going to ask for maybe a 17 five-minute break. MR. LIBBY: Yeah, sure, we can do five 18 minutes. If you want longer, we can do a 19 20 little longer. It's up to you. 21 MR. LARGAY: Do you smoke? 22 THE WITNESS: Yeah. 23 MR. LARGAY: Yeah, okay. Is ten minutes 24 okay? 25 MR. LIBBY: Yeah, we'll do ten minutes.

1 MR. LARGAY: Okay. Yeah, I just didn't want to have you start asking questions and 2 then interrupt in the middle of them. But I 3 promised him that I would ask for various 4 breaks and --5 MR. LIBBY: Sure, no problem. 6 7 (A break was taken from 2:06 p.m. until 8 2:21 p.m.) 9 BY MR. LIBBY: You've just finished giving some information 10 11 about how you recollect the incident with 12 Piper happening. Do you -- do you recall 13 telling Mr. Davis that Piper was a pretty dog? Yeah. I tried to be sociable. In Little 14 City, how you meet people (technical 15 interference) --16 17 Wait, hold up. We're -- your audio was 0. 18 cutting out. So can you hear me now? 19 I can hear you. Can you hear me? Α. 20 Q. Yep, we just had a little bit of an 21 interruption there. 22 So I had asked you if you recall telling

Mr. Davis if Piper was pretty, and I think you

said yes, you try to be social, and then you

cut off after that.

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- 1 In Little City, there are many people who own Α. dogs, and everyone told me the way to meet 2 3 people is to either buy a dog and have it -train the dog and then go through the 4 neighborhood, and people seem to socialize 5 6 with their dogs. So anyone that I see with a 7 dog, I always say, You have a nice dog, and, you know, What type of dog is it, just small 8 9 talk, and then it opens up the conversation to socialize more. 10
  - Q. Okay. So do you recall Andrew offering to introduce you to Piper after you said the dog was pretty?

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- A. We were in front of the driveway and he had said something like that. I cannot -- I remember him saying that -- he said the dog wasn't on a leash, and I didn't pay too much attention at that point. We just kept walking.
- Q. Do you recall Mr. Davis asking you if you wanted to meet the dog?
  - A. I can't, oh, remember that, like, as you say.

    You know, it was just small talk. You know,
    there was nothing serious. You know, I wasn't
    paying much attention.

1 MR. LIBBY: Tammy, could you enable screen sharing? 2 3 THE REPORTER: There you go. MR. LIBBY: Thanks. 4 5 (Exhibit 2, Deposition of Andrew Davis, was introduced.) 6 7 BY MR. LIBBY: Otto, I just shared my screen with you, and do 8 Q. 9 you see -- I'll blow it up a little bit here. 10 Do you say the caption of this, Otto Snow versus Andrew Davis, and the other the 11 12 parties, in the left corner? 13 Yes, I do. Α. And you can see here -- I'm highlighting it --14 Q. it's the deposition of Andrew Davis? 15 16 Yes, I do. Α. 17 All right. So I'll mark this as Snow Ο. 18 Deposition Exhibit Number 2, and I'll scroll 19 down to a portion of the testimony by Mr. Davis on page 9. Actually, we'll start at 20 21 page 8. And these are questions by Tom 22 Marjerison to Mr. Davis. And you can see 23 we're on page 8 here? And I'm going to refer 24 you to line 9. 25 Do you see that, where I've highlighted?

MS. HUFF: Matt, I'm going to have to just play with the computer screens a little bit because the Zoom screens are the same.

Let me -- just give me just a moment, if you would, please. The video screens of counsel and the court reporter are now covering the right side of the deposition transcript. So I'm going to try to change my screen a little bit, if I can.

MR. LIBBY: Okay.

MR. LARGAY: I just I don't want to lose the connection or anything. The screen is now showing both sides of the transcript.

MR. LIBBY: Okay.

BY MR. LIBBY:

- Q. So to give you some context here, Otto, I'll represent to you that Mr. Davis is my client's son and my client, Debra Conley, was renting an apartment at this property owned by the landlord. Okay? Do you have any reason to dispute any of that?
- A. No, I don't.
- Q. Okay. I'll also represent to you that
  Mr. Davis went to the apartment that day,
  picked up Piper, and then went outside with

the dog off leash. Okay?

A. Okay.

- 3 Q. All right.
- 4 A. Okay.
  - Q. So then we'll pick up here. All right? So on line 9, I'll read the question to Mr. Davis. It says, When did you put Piper on a leash after you left the apartment, question mark. Then the answer is as follows, Piper and I left the apartment, period. Piper ran to the edge of the property, comma, I called Piper back to me because I saw there were people, period. Piper came back to me, comma, she sat down, comma, and then I put her on leash,
- 16 A. From what I see here, yes.
- Q. Do you have any -- do you have any recollection of hearing Mr. Davis call Piper back to him after you saw Piper in the road or by the road?

period. Did I read all that correctly?

A. No, I don't. I was talking with John, and we saw the dog running into the street and then going back to Mr. Davis, who was at the top of the driveway near the garage doors, and we saw the dog running out into the yard without a

- 1 leash and then the dog running around
  2 Mr. Davis.
- Okay. I'm going to go to page 9 here, and at 3 Q. the very end, line 25, there's a question. 4 5 says, When she came back to you, what did you 6 do, question mark. The answer is, I put Piper 7 on leash, period. Otto commented on how I had 8 a pretty dog, comma, and I responded with, Her 9 name is Piper, would you like to meet her, 10 question mark. Did I read that correctly?
- 11 A. Where is this now?
- Q. So it starts on page 9, line 25. Do you see where I'm highlighting?
- 14 A. Okay. Yep, I see that.
- Q. So that's the question I read, and then this is the answer that I just read. You can take -- you can read through those and just make sure that I read them correctly.
- MR. LARGAY: Would it be easier to read on there? You don't have to --
- 21 THE WITNESS: Nope. No, I see it.
- 22 A. Well, what you're reading is correct on here.
- 23 BY MR. LIBBY:
- 24 Q. Right.
- 25 A. But when John and I were at the end of the

- driveway, I didn't see him putting the dog on a leash at that time. It was when we started walking that I glanced back, and it looked like he was putting the dog on a leash on a collar in the driveway.
- Q. So you don't recall -- or you would dispute
  Andrew's testimony that he put Piper on a
  leash shortly before he -- you commented on
  how pretty the dog was?
- 10 A. Yeah. The dog wasn't on a leash when I was
  11 talking with Mr. Davis. It was running
  12 around.
- 13 Q. All right.
- A. And I says, That's a nice dog. You know, any time I see someone with a dog, I'll make it -- a few times, I'll make a comment, you know, I like your dog and --
- Q. Okay. So I'll just -- and then you can see
  here that he does say that, Otto commented on
  how I had a pretty dog, and he said he
  responded with, Her name is Piper. Any reason
  to dispute that?
- A. I didn't catch the dog's name. We had just kept walking. So --
- Q. Okay. Do you dispute whether or not Mr. Davis

asked you if you wanted to meet the dog? Do you dispute that?

- A. Well, I can't recollect him saying that to me.

  He could have said that to me. I really

  wasn't paying that much attention.
- Q. All right. So I'm going to skip over here to page 12 and then we're going to line 10. In here the question by Attorney Marjerison is as follows, I interrupted you, period. You called, dash, you left off with Piper came back to you, comma, you put Piper on a leash, semicolon, correct, question mark. And he responded, Yes, sir. Did I read that correctly?
- A. Let me see. Yes, I can see the text here.

  Yes, you have read that correctly.
  - Q. Okay. And then you'll see on line 17 or line 16 that Attorney Marjerison asks

    Mr. Davis to describe what happened next, and I'll read that to you. Starting at line 17, it says, I, dash, Otto asked me at, dash, commented on how pretty my dog was, period. I asked if he would like to meet her, period. He said yes, period. I proceeded across the yard, and as I did I that, I informed him to

be careful, comma, she likes to jump, comma, and we proceeded across the yard, period.

Piper leaped up to see Otto, comma, Otto looked down to see Piper, comma, and they butted heads, period.

Now, I know you might take issue with some of that but, did I read that correctly to you?

A. Yes, you did.

- Q. All right. So do you recall telling Mr. Davis that you wanted to meet the dog when asked?
- A. I just remember small talk when I was at the end of the driveway. I don't know where he's saying that this occurred. And he says that when I proceeded across the yard. I thought he was in the road, but I just looked back and he was behind me.

I wasn't paying that much attention. I was trying to listen to John, and I had pizza on my mind at that point. And I didn't -- and he says -- oh, let me see. I don't know any of this, but all I know is that John was to my right, John stopped and turned his head, I stopped, I turned my head, and that dog lunged at me from somewhere, whether it was the yard,

- the street or -- I did not bend over. I don't know what he means by butting heads. It bit me right on my lip and tore my lip. So --
- Q. When you had small talk with Mr. Davis and the dog, you had stopped walking at that point, right?
- 7 A. Yes.
- 8 Q. All right. How long did that small talk last?
- 9 A. Oh, I don't know. Probably, oh, less than a minute.
- Q. Okay. So how far away were you from Mr. Davis and the dog during that small talk?
- A. I'm just saying approximately four feet into
  the street, and Mr. Davis was at the top of
  the -- or at the other end of the driveway.
- Q. So how many feet -- how many feet separated you from Mr. Davis, roughly?
- A. Oh, I don't -- I'm not sure. How long is the driveway, 15 feet, 20 feet?
- Q. How many car lengths, if you could do it that way?
- A. Oh, one, two. Maybe about one and a half, two, something like that.
- Q. Do you dispute that before you had this small talk with Mr. Davis and the dog that Mr. Davis

- told you that Piper liked to jump or something to that effect?
- 3 A. I can't recall any of this.
- 4 Q. Okay. So you don't recall?

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- A. No, I can't. I was primarily talking with

  John, and, you know, I was just trying to be

  nice, you know, You have a nice dog, et

  cetera, et cetera. So --
- 9 Q. But you don't recall him telling you that
  10 Piper liked to jump, but it's possible that he
  11 made that comment, you just don't remember?
  - A. I guess, but, you know, he could have said a bunch of things. And, you know, I was talking with John.
- Q. Well, you were talking with Mr. Davis, though,
  too. Like, you said, you were having small
  talk?
  - A. Yes, I was, at the end of the driveway. And I can't recall that he said anything about the dog jumping while I was at the end of the driveway.
  - Q. So I've shared my screen or I'm sharing my screen. Do you see my screen? And there's a document at the top that says, Free Form Narrative.

1 (Exhibit 3, Bangor Police Department LAW Incident Table, was introduced.)

A. Yep.

BY MR. LIBBY:

Q. Okay. I'll represent to you that this is a document that was produced by your attorney in response to document requests submitted by the landlord and owner of this property. I'll scroll up, and you can see it's in response to Request for Production Number 10. I'll mark this exhibit, or this document, as Exhibit Number 3 of the deposition. And just for simplicity's sake and completeness, I'll just include all of the documents that were produced by your attorney, Otto, in response to Number 10. And you can see there's this first page, it says, Bangor Police Department, right?

A. Yep.

Q. And I'm going to scroll down, and the next page says, Free Form Narrative, dated
April 15, 2018. Do you see that?

A. Yes.

24 Q. It says, Reporting Officer, Eric Lund?

25 A. Yep.

- Q. Do you remember speaking with Officer Lund at the hospital?
- A. Yes, I do, and Mr. Davis kept interrupting.

  And I was very concerned about my face.
- 5 Q. All right.
- 6 A. And --
- Q. Let me read part of his report, and I'll ask you to comment on it.
- 9 A. Okay.
- 10 So the first paragraph, it states, On the 11 above date and time I was dispatched to 12 St. Joe's Hospital ER at 297 Center Street for 13 an animal problem that took place at -- and 14 then this part of the report is redacted -period. Then it says, Dispatch advised that a 15 16 subject was there getting treated for a dog 17 bite, comma, and the dog's owner was present, 18 period. Did I read that correctly so far?
- 19 A. Okay, let me see. Yes, that's correct.
- Q. Then it says, Upon my arrival, met with victim, redaction, open parens, DOB, redaction, closed parens, and the dog owner.
- 23 Have I read that correctly so far?
- 24 A. Yep.
- 25 Q. I know it's hard to decipher this because

there are redactions, but is it fair to presume that you are the victim in this report and the dog owner is Mr. Davis?

A. Yes, yes.

Q. All right. So the next sentence starts off with a redaction. Blank stated that he was on blank Avenue taking a walk when blank dog, Piper, came running to him, period.

Is it fair to say that, according to the report, you were telling the officer that you were taking a walk on a certain avenue when the dog came running up to you?

- A. Well, when it bit me, I guess it must have came running up to me because it couldn't bite me if it was on the other side of the yard.
- Q. Okay. Well, I don't think he's -- he's there yet. I think he's referring to the very first time that you saw or interacted with Piper.

  He's not talking about the bite yet.
- A. Okay. No, that did not take place. The dog did not come running up to me. It was running into the street and it ran back into the driveway where Mr. Davis was.
- Q. All right. So let's keep reading.
- 25 A. Okay.

Q. And that he advised that blank called Piper back to him and she came.

Now, I'm assuming that when he says, He advised, he's referencing you, and the blank there, the redaction is referring to

Mr. Davis. Do you recall telling the officer that you heard Mr. Davis call Piper back to him and that Piper complied?

- A. I don't know. I guess, but, you know, my face was opened up and there was blood all over, and I was just trying to get my face stitched up. So I really can't remember exactly verbatim what I was saying. It was, like, a dog attacked me and opened my face. So, you know, I'm not sure if I saw the dog running back to Mr. Davis.
- Q. So let's keep reading. It's -- the next sentence says, Redaction commented on Piper and redaction asked if redaction wanted to meet her.

So this seems to indicate that you told the officer that you made a comment on Piper and Mr. Davis asked if you wanted to meet her. Any reason to dispute that interpretation?

A. Yes. This -- well, no. This could have taken

- place while we were at the end of the
  driveway. And Mr. Davis was quite busy with
  the dog; so we just kept walking.
  - Q. Okay. The next paragraph, it says, Blank said he would, and Piper came to greet him.

Now, that indicates -- and we'll be able to get the unredacted version of this eventually, but would you agree that the report seems to indicate that you said you would like to meet Piper? Would you disagree with that?

- A. I don't -- in here it says, Redacted <u>said he</u>

  would, and <u>Piper came up to greet him. That's</u>

  incorrect.
- Q. Okay. And how is it incorrect?

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- A. Well, I was at the end of the driveway

  talking, you know, small talk with Mr. Davis,

  and the dog didn't come over to greet me. We

  kept walking.
- Q. All right. So you don't -- if Mr. Davis were to testify that he actually put the dog on the leash and walked to you so you could meet the dog, you would disagree with that?
- 24  $\mid$  A. I don't know what Mr. Davis was doing.
- 25 Q. Well, let me ask that again. If Mr. Davis

testified that he leashed the dog and then
walked the dog over to you and John so you
could meet the dog, you would disagree with
that?

5 MR. LARGAY: Objection as to form.

6 BY MR. LIBBY:

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- Q. Would you disagree with that?
- 8 A. I'm confused by it.

9 MR. LARGAY: You can answer.

- 10 A. Okay. I guess he was coming over to show us
  11 the dog or he was taking the dog for a walk.
- 12 <u>I'm not sure what he was doing. He was behind</u>
  13 us.
- 14 BY MR. LIBBY:
- 15 Q. Okay.
- A. And we just kept going. You know, if he's

  taking the dog for a walk or he's going to

  show us, you know, I have no idea is what I'm

  saying. He's just behind us.
  - Q. I'll represent to you -- and I think we just read the deposition, but Mr. Davis testified that the dog was on the leash at the time that you suffered your injury. Do you have any reason to dispute his testimony that the dog was on the leash?

- 1 A. Why wouldn't he pull the leash if the dog was
  2 lunging at me?
- Q. You understand that my client, Debra Conley,
  does not own Piper and never owned Piper,
  right?
- A. I have -- I'm just reading that, oh, Mr. Davis owns the dog.
- Q. All right. And my client was never in possession of the dog at the time you were hurt, right?
- 11 A. I have no idea.
- Q. Okay. Well, we confirmed that when you were hurt, my client was not visible, you didn't see her outside at all, right?
- A. I said there was a woman who came out and gave me a ride. I don't know who she was.
- 17 Q. Right. But that was after you were hurt?
- 18 | A. Yeah.
- Q. Right. So before you were hurt, did you ever see anybody other than Mr. Davis in the yard or close to the street with the dog?
- 22 A. No, I did not.
- Q. Did you consume any alcohol that day prior to the incident?
- 25 A. No, I did not.

- 1 Q. Do you know if John Huhn consumed any alcohol
  2 prior to that incident?
- 3 A. While he was with me, he didn't consume any.
- Q. You're claiming that you had property damage as a result of the incident because some clothing was damaged?
- 7 A. I was covered in blood.
- Q. Are you seeking compensation for that property damage?
- 10 A. No. I figure that's chump change.
- Q. Okay. And you are claiming that you have a scar and a permanent disfigurement?
- 13 A. Oh, yeah, definitely.
- Q. Are you making a claim for loss of income because of the injury?
- A. Oh, I went out of my mind, I went out of my mind.
- Q. Well, that's not necessarily an answer to my question. Are you --
- 20 A. Oh, yeah. Oh, big time, yeah.
- Q. Big time. So are you claiming that any of the defendants in this case owe you money for loss of wages or loss of income from the incident?
- A. Well, someone's got to take accountability for a dog opening up my face and my mind.

- Q. So do you have any idea how much you think you're owed for loss of wages or loss of income because of the injury?
- A. I'm going to have to get help for quite sometime. It opened up traumas, real dangerous traumas.

## Q. Okay.

A. I don't know the exact figures or any of this stuff, but I've got to get some help here.

MR. LIBBY: All right. So what I'd like to do, Chris, is I'm going to haul out Kady and Sam, but I would like to keep the deposition open as to the loss of wage claim because that has not been developed and articulated enough for me to ask meaningful questions. And that's one component of leaving the depo -- (technical interference).

MR. LIBBY: I think we got cut off,
Chris, as I was just asking to keep the
deposition open as it relates to any medical
or mental health records that we currently
don't have that might be relevant to the
claim.

(A discussion was held off the record.)

MR. LARGAY: Yeah. So as long as it's

1 limited to what has not already been asked and answered, in other words, new medical records 2 3 or information about lost wages, I have no problem with that. 4 5 MR. LIBBY: Okay. All right. With that 6 reservation, I'm happy to turn it over to Sam 7 or Kady. 8 MS. HUFF: I do have some questions. 9 Sam, do you have a preference on who goes first here? 10 11 MR. JOHNSON: No. My questions are very 12 narrow and very limited. So I'm happy to go 13 last or I'm happy to go now and see if that prompts anything, whatever you prefer. 14 MS. HUFF: Perfect. Well, I'm happy to 15 16 proceed. I have a fairly brief list here. 17 are we ready to proceed? 18 THE WITNESS: Sure, sure, yeah. MS. HUFF: Perfect. 19 20 EXAMINATION BY MS. HUFF: 21 22 Q. Good afternoon, Mr. Snow. My name is Kady 23 Huff, and I represent Andrew Davis, one of the 24 defendants in your case.

Can you hear me and see me fine?

A. Yes, I can.

- 2 Q. Perfect. Well, I want to ask you a few
- 3 questions to follow up here, and I wanted to
- 4 start by talking about the June 2022
- 5 evaluation that you had performed. Do you
- 6 recall testifying about that a few moments ago
- 7 here today?
- 8 A. Not -- you'd have to recollect me on that.
- 9 What was that about again?
- 10 | Q. So at the outset of the deposition, you
- indicated that you recently had a mental
- 12 health examination or evaluation completed --
- 13 A. Yes.
- 14 | Q. -- in June of this year. Who conducted that
- 15 evaluation?
- 16 A. Dr. Elliott Rosenbaum.
- 17 Q. And where does Dr. Rosenbaum practice?
- 18 A. Out of -- where is it now -- Jacksonville,
- 19 Florida.
- 20 Q. And was that an evaluation that you requested?
- 21 | A. Yes, yes.
- 22 | Q. And why did you request that evaluation?
- 23 A. Because my traumas are coming out and we
- 24 needed a synopsis of what goes on because when
- 25 they started coming out, I was being, oh,

- invalidated and gaslit up here, and I said
  we're going to put a stop to that immediately.
- Q. And you're referring to we. Who are you referring to when you say we?
- 5 A. Me.
- 6 Q. So you, yourself?
- 7 A. Yeah.
- Q. And so you requested this doctor in Jacksonville perform the evaluation?
- Yes. I had spoken with another, oh -- another 10 Α. 11 psychologist, and he had suggested that I find 12 someone who was very good to do this because 13 it was a little too much for him. He was a professor, and he had a family. And he says 14 it's just a little too much for him. 15 So he 16 suggested that I find someone who, you know, 17 was very qualified to do this.
- Q. And your primary residence is in Bangor, correct?
- 20 A. Yes, it is.
- Q. And how much of your time do you spend in Florida?
- 23 | A. None.
- Q. And so you went to Florida specifically for this evaluation?

- A. No. We did it through Zoom, and he has access
  to, oh, my medical records, news clips, videos
  of all the things that I've been through, my
  books, pretty much everything. We've still
  got more we might put on.
  - Q. Okay. And do you treat with any local practitioners, therapist, counselors, LCSWs in the Bangor area?
- 9 A. I go over to Mabel Wadsworth. I primarily try
  10 to stay away from the GPs here and the local
  11 doctors.
- 12 Q. And what is Mabel Wadsworth?
- 13 A. It's a women's health center.
- 14 Q. Where is that located?

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- A. In Bangor. But that's -- it's just -- that's
  the level of GP. I'm not dealing with psych
  anymore here. I do see a psychiatrist out of
  the Portland area, but he's just providing me
  with diazepam as my traumas unfold. We're not
  discussing anything.
- 21 Q. Who is your Portland practitioner?
- 22 | A. Let me see. Dr. Bilotti.
- 23 Q. And where is Dr. Bilotti out of?
- 24 A. Somewhere in Portland.
- 25 Q. And you said the only purpose of that

treatment is to receive medication?

- A. Yeah, I'm not discussing this anymore. I'm releasing the information on this. I may very -- I'll discuss it with maybe a couple of experts, but I'm not playing this psych game anymore.
- Q. And what experts are you referring to?
- 8 A. Folks that are very familiar with 9 posttraumatic stress disorder.
- Q. Okay. And you understand throughout this deposition you've indicated that you're -you've been suffering from your past trauma, correct? You've been talking about that?
- 14 A. Oh, yeah, big time.

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- Q. And nightmares that you've been suffering from, correct?
  - A. Oh, yeah. The nightmares have tamed down, but
    I'm still having real bad sleep issues, and
    traumas are being organized in the videos so
    that they can be easily looked at and
    reviewed.
- Q. Are you treating with any practitioners relating to the lack of sleep or the nightmares that you're experiencing?
- 25 A. No. I found them to be argumentative, and

most of them have little experience with severe PTSD. What I need for a medication, I tell them what I can tolerate. So I just -- and then I'll go into, oh, herbal supplements or whatever I need. And, also, I tell them, you know, I need some facilitation to meet people because if I don't have people around me, I go out of my mind. So -- and a psychiatrist can't really prescribe.

- Q. Okay. So I just want to confirm that you are not treating with a professional with respect to the past traumas, the nightmares, or the lack of sleep. Is that a correct understanding?
- A. I'm not discussing this with anyone. It will be coming out.
- Q. And when you say it will be coming out, what do you mean by that?
  - A. It's going public, what I've gone through,

    it's going to be up online. I'm going to be

    giving talks on it. I'm not talking with

    psychiatrists just to go around in circles.
    - Q. Okay. So let's talk about -- when you say it's going up online, where would somebody find the information you're putting online?

- A. Well, I'm looking at quite a few different servers, and then it will go through the -- oh, the search engines.
  - Q. Okay. So can you just walk us through sort of the process you might go through to put your information up online?
- 7 A. I don't know. I'm not an expert with that. I have other people handling it.
- 9 Q. Do you coordinate with those other people?
- 10 A. I'm just sending them stuff and we're pulling it together now.
- 12 Q. And how do you send them information?
- 13 A. Oh, just a click on my computer.

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- 14 Q. Okay. So do you use email, for example?
- A. Email, before -- years ago, transferring
  information was done -- I can't remember what
  it was. We'd upload it into servers, and then
  from there -- so later on, it's going to be
  transferred that way.
- 20 Q. And do you have quite a bit of information 21 that you're relaying to these individuals?
- A. Oh, yeah. It's been nonstop since the dog bite.
- Q. So it must take a lot of effort and time to upload those documents and to organize them;

would you agree?

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I have people with me doing it because I was Α. going out of my mind. I'm not going to have people saying to me that it was delusional, it didn't happen. I was standing next to the goddamn building when it blew up and I saw my friend was burned alive. I'm not tolerating this from these doctors around here. It opened this thing up. It's not shutting down, it's coming out. I have no choice in this matter. I'm just trying to manage this thing, and a few folks have been helpful. Law enforcement knows something about it. They've been sitting with me for years. They're wonderful. I tell them I've seen wicked. These folks have never seen the wicked that I've gone through, and they understand. And they say, Any time you need us, we'll come sit with you.

I'm just letting it come out. It's taken all -- it's just opened up. It took decades to get this under control. I couldn't even walk into medical buildings without shaking all over. And I told these folks to be really careful of me, I'm not going to be pushed

- around. People coming into my family's house and terrorizing us for money, doctors drugging women and sexually assaulting them, and you contact the government and it doesn't do a damn thing. All this is coming out now. I'm trying to just keep a tight grip on it.
  - Q. So I want to make sure we stay focused. I don't want to interrupt you, but I want to just keep focused on the questions that are being asked.
- 11 A. Okay.

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- Q. And so we were discussing the sort of technical process of organizing your information, uploading it, transporting it to someone else, and the time commitment that you've put into undertaking that obligation that you have, right?
- 18 A. Right.
- Q. And you're working with a professional out of Florida?
- 21 A. Yeah.
- Q. Do you have a time frame on when you
  anticipate uploading this information or going
  public?
- 25 A. No, I don't. We're keeping it private right

now so that experts that are doing the review,
reviews and looking at this, will have the
ability to look at it.

- Q. Okay. And at what point will you start doing the talks that you've proposed?
- A. I don't know. Everything seems to happen when it happens. I'm just moving forward with that.
  - Q. And what kind of talks? Are they sort of inspirational talks? Can you explain a little bit further?
- 12 A. <u>Exposés --</u>
- 13 Q. Okay.

A. -- on the names of people who are involved and who wanted to cover up things and how certain government agencies were very helpful, whereas others, they didn't have jurisdictions and the things that people have to go through when, you know, you really need some help.

And I was hoping to get the books -- I

want to get the books back into print, but,

you know, everything's been coming apart. I

had people who were going to try to help me

but instead have been helping me with

paperwork.

Q. Let me ask you a couple more questions about the talks before we move on to the books, because I do have some questions about the books.

With respect to the talks, do you know who your target audience will be?

- A. Probably college students.
- Q. Okay. Will these be live talks or will they be prerecorded?
- 10 A. I'm not sure right now.

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- 11 Q. Okay. Do you know how long the talks will be?
- A. Until we get a patient rights bill in this

  nation and people start standing up for us.
  - Q. So I apologize, that was a poorly worded question. I'm talking more of the duration.

    Will be it, you know, like a one-hour seminar?

    Will it be a half-day program? Have you thought --
- A. I have no idea. I'll let other folks kind of
  manage that, because when it comes out of me,
  it just comes as a stream, it doesn't stop.
  - Q. Okay. So I want to talk to you about your books. So one of your claims from your complaint is that you've lost income as a result of your injury. Is it safe to say

1		that's your claim?
2	Α.	Oh, yes, definitely.
3	Q.	And if you recall in your answers to
4		interrogatories, you talk about lost income
5		with respect to your books. So I want to talk
6		to you about the books that you've published.
7		Okay? And so let's talk about those.
8		You have a series of books that you have
9		published, correct?
10	Α.	Yes.
11	Q.	How many books would you say that you've
12		published?
13	Α.	You mean individual titles or how many books?
14	Q.	Let's say individual titles.
15	Α.	I think it was six or seven.
16	Q.	Okay. Well, I want to talk to you a little
17		bit about your books. I don't want to get,
18		you know, too deep into the premise of the
19		books, but
20		MS. HUFF: Tammy, if it's acceptable, I'd
21		like to share my screen, if that's possible.
22		THE REPORTER: Yep.
23		(Exhibit 4, Various Books Listed by Otto
24		Snow listed on Amazon, was introduced.)
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BY MR. LIBBY:

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Q. Mr. Snow, I'm going to share my screen, and you should be able to see it now. And I apologize, I'm going to be facing another way.

My setup doesn't quite work for this.

But can you see the screen that I'm sharing here? You should see the title of a book, "LSD."

- 9 A. Yes.
- 10 | Q. Do you see that?
- 11 A. Yep.
- 12 Q. That book, that was authored by you?
- 13 A. Yes it is.
- Q. And it's titled "LSD." Would it be safe to presume that the topic of that book covers
- 16 LSD?
- 17 A. Yes.
- 18 | Q. And have you ever utilized LSD before?
- 19 A. When I was 15 I had, oh, horrendous migraine
- headaches, and I went for some sessions, and
- 21 <u>it cured the migraines.</u>
- 22 Q. And since that time, have you used LSD again
- to treat migraines or other pains?
- 24 A. I think -- oh, let me think. Oh, a couple
- 25 times when I was a teenager. The doctors had

- me on oxycodone, hydrocodone, phenobarbital,
  ergot alkaloids, and belladonna alkaloids. I

  couldn't walk, I was staggering, I couldn't

  play sports. So it was a defense intelligence

  community, and that's what people took for

  migraine headaches instead of getting all, oh,
  messed up on narcotics and all that stuff.
  - Q. Okay. So you listed this book for sale on Amazon; is that right?
  - A. Originally, but I haven't -- they're not in print anymore. So I want to get them back into print because they're selling for a very high price.
- Q. And so let me ask you, in 2018, prior to the injuries you sustained, were these book in print?
- A. I had -- I think I closed my company -- I'll have to look. I think I closed it in 2016,

  and I was --
- Q. I'm sorry. And so your company had closed prior to 2018?
- 22 A. Yes.

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Q. Okay. So this book, "LSD," your name is on the title here as the author, it's currently being sold for \$877; is that right?

A. I guess. I can see it here.

for a bit.

- Q. And how -- what is your lifetime sales of this book, if you recall?
  - A. Oh, I don't know. They go -- I do runs. I'm

    2,000 book run

    not exactly sure. It could have been \$2,000,

    5,000 book run

    it could have been \$5,000, something like

    that. I'd have to look or think about this
- 9 Q. And do you maintain records of the books that sell?
- 11 A. The distributors maintain the records.
- Q. Okay. And you would have access to those, correct, as the author?
- 14 A. I have no idea. I'm not doing publishing right now.
- Q. When you would sell a book, is it safe to say you would report the income you earned from that sale?
- 19 A. Yes.

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- 20 Q. And would you report that in a tax return?
- 21 A. Yes.
- Q. And so there would be a historical record of
  every dollar you earned from the sales of your
  book, safe to say?
- 25 A. I have no idea. I let my accountant handle

1 this stuff.

- Q. Oh, okay. Who is your accountant?
- 3 A. I'll have to dig it out, but I can provide it.
  - Q. And so do you work with a local accountant?
- 5 A. Well, when I was doing publishing, it was in Florida.
- Q. Okay. And you would have access to your historical financial records, correct?
- 9 A. I generally throw them out.
- Q. But your accountant should maintain a record, safe to say?
- 12 A. Yeah, yep.
- 13 So I want to talk to you about a couple of Q. your other books. So we have "LSD." And I'm 14 going to try to rotate here so that we're 15 16 looking at this in the right direction. We 17 have "Amphetamine Syntheses Overview and 18 Reference Guide for Professionals." Is that another book authored by you, sir? 19
- 20 A. Yes, it is.
- Q. And can you give us the "Reader's Digest" version of the premise of this book?
- A. It's, oh, primarily the syntheses of -- and empathogens
  pathogens and entactogens which are being
  funded by NIH today.

- Q. Okay. And this is a book that's listed for sale at \$500 for the paperback. Do you see
- 4 A. Yeah.

that?

- Q. How many sales to date have you received on this title?
- A. Oh, I'm not sure. Again, I think it -- I'll

  do, like, 2,000 runs. I think this book went

  into two printings. So it would be -- I think

  4,000 books

  it would be something like \$4,000.
- 11 Q. Okay. And did you sell those for the retail price of \$500 each?
- A. No. The books hadn't hit at that point. It
  was, like, the early stages or the beginning
  of all this funding on the entactogens and
  empathogens
  pathogens. So that's why I wanted to get it
  back into print.
- Q. Okay. And, again, this was something that was not in the process prior to 2018, correct?
- 20 A. Oh, I closed the company in 20 -- I think it was 2016.
- Q. Okay. So I want to talk to you about a couple titles. You have the book "Oxy." That's a book that was authored by you; is that correct?

A. Yeah.

- 2 | Q. And that's out of print, correct?
- 3 A. Yeah, that wasn't going to go back into print.
- 4 Q. Okay.
- 5 A. I had no -- I wasn't interested. That one I
- 6 didn't want to go back into print, either.
- 7 Q. This is "THC & Tropacocaine, First Edition."
- 8 This is authored by you, correct?
- 9 A. Yep, but I didn't want to put it back in --
- 10 Q. So this would be a book that you never
- intended to put back into print?
- 12 A. No, no, it's pretty boring?
- 13 Q. The final one is "LSD-25 & Tryptamine
- 14 Synthesis."
- 15 A. No, that wasn't going to go back into print.
- 16 Q. Okay. So that's out of print. And these were
- all written in the late '90s, early 2000s; is
- 18 that safe to say?
- 19 A. Yes, it is.
- 20 Q. Have you authored any books since, let's see,
- 21 2006?
- 22 | A. I'd have to check. I think I did -- the
- 23 "Amphetamine Syntheses," I know it went into a
- 24 second printing, and I think that was, like,
- 25 2000 -- it could have been 2007.

- Q. Okay. So the first printing would have been 1998 with a second in 2007?
  - A. Something like that, yeah.

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Q. I'm going to stop my screen share here.

And so you indicated in your answers to interrogatories that due to the injury you have sustained as a result of the dog in this case that you've been unable to sort of market your books and things like that; is that correct?

- A. Oh, I can't do anything.
- Q. And you haven't taken any efforts to market
  your books since 2018, correct?
  - A. I'm lucky if I can cook a meal and try to
    figure out which doctor to go see that I won't
    get in a fight with and if there's any places
    I can go where people are friendly here. And,
    you know, you've got to hire someone to keep
    calling people back. You know, I'm just
    overwhelmed by everything, and the traumas are
    coming out. I can't do anything.
  - Q. So I would like to ask you, Mr. Snow -- I've never published a book so I don't know what goes into it, but if you were to market or want to market your book, what types of things

might you do under dual circumstances?

A. Well, it would have to be how I would look at it. It depends on the lens that I use. Since the traumas are coming out, what I would have to do is when the traumas go online and I give talks, then sell the books that way.

If these traumas weren't coming out, what I would have had is someone to, oh, do cognitive redirects and bend me back into shape and, you know, handle logistics so that I could get the books ready to go to the printer and then try to find a printer and have them put out.

And, you know, it involves quite a bit.

You've got to have certain sized boxes so that
you can tell how many books shipped here and
there. It involves, you know, calculating
things out. So you've got to have your wits
about you. You can't be all over the place
because if you order wrong or do something
wrong, you're stuck with a bunch of bad books
that you've got to get rid of.

So I was hoping to get these -- I had -- we had set up the computers, we're setting everything up, trying to get the software and

- just -- it all came part. It just all came
  apart.
  - Q. Okay. Well, I want to touch base -- we talked pretty -- in some depth about your past traumas, and I think I have an understanding of some of the ones you mentioned. But you did indicate that when you were a year and a half, you were a witness to an explosion and impacted by that. Do you recall that testimony?
- 11 A. Yes.

- 12 Q. Where did that explosion take place?
- 13 A. On Lake Attitash in Merrimac, Massachusetts.
- Q. And did you ever come to find out what caused that explosion?
  - A. It was gas that filled the basement to the building. It was a water heater that was broken and the owner of the property wanted to repair it themselves to save money, which was stupid; so it filled the basement full of gas.

    And the person -- the man went downstairs because the flue was out and he lit a match and the building blew up. So it was a big gas explosion.
    - Q. And did your family ever pursue legal recourse

- as a result of that incident?
- A. What sort of legal recourse would they have?

  It wasn't their house.
  - Q. Was there any lawsuit filed with respect to,
    you know, the trauma that you experienced from
    that incident?
- A. No. Back in those days, you just buried

  stuff, you know, shame, you don't talk about

  it. I think my grandparents got some money

  because it burned their cottage or something.

  It was ungodly. Oh, my God, terrible.
- Q. And have you ever, Mr. Snow, suffered any trauma related to dogs in your past?
- 14 A. No, I haven't.
- Q. Have you ever had any other experiences with dogs that are not favorable or satisfactory to you?
- A. You'll have to rephrase that because I rescue dogs, and I don't like the way that -- you know, you have to be good to dogs.
- Q. So you've never been bit by a dog in the past?
- 22 A. No, no.
- Q. You have no traumas related to dogs?
- 24 A. No.

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25 | Q. Okay. Well, I want to talk to you a little

bit, you know, about how you've been impacted from the injury. And you're wearing a mask now; so we, on this -- in this deposition can't see you physically. But do you have a scar that's visible, you know, to a person who were to look at you without a mask?

A. Yeah, yes, I do.

- Q. Okay. Can you sort of describe what that scar looks like to us?
- A. It looks like pieces of my face were stitched back to together, like something was torn from my face and stitched back together, and my mouth is crooked.
- Q. And you're wearing your mask today. Do you typically wear a mask?
  - A. At times. I don't feel comfortable right now, but I will provide you folks with photographs.
    - Q. Yep, and that's understood, but I'm not asking you to you remove your mask by any means, I'm just trying to get a sense, you know, when you feel it's necessary to wear it.

So let me ask the follow up question, you know, if you were going to the grocery store, for example, do you feel it necessary to wear your mask in that setting?

A. Sometimes, sometimes.

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- Q. Okay. Can you give me a breakdown of how frequently you wear a mask, if you had to give a percentage?
  - A. I have no idea. If I'm just not feeling too good, I might put it on. You know, I'm trying to overcome this; so, you know, I try not to wear it that often. You know, I'm trying to get beyond this thing. With the hair on my face, people can't see this. And people don't smile to each other here anyways.
- 12 Q. Do you have any criminal history?
- 13 A. What do you mean?
- 14 Q. Have you ever been arrested, for example?
- 15 A. Oh, yeah, a few times.
- 16 Q. And can you describe those occasions for us?
- A. Let me see. My early twenties, I had -- AT&T

  was a little ticked off at me. I had a blue

  box, and they were hunting for one of these

  things and -- but, unfortunately, I didn't

  have it at the time. So -- but that pretty

  much blew over.

Let me see. The home invasion in '85
when my family and I were terrorized for
money, that was done under a guise of a

- - previously when you testified about the home invasion, I understood it as third parties entering your home to sort of take your belongings.

Was this a government agency that entered the home or a state agency?

- A. It was orchestrated by two Maine state -former Maine state troopers who were fired
  after the FBI investigation.
- Q. And what is your understanding of why they wanted to enter your family's home?
- 16 A. It was a shakedown for money.
- 17 Q. What do you mean by that?

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- 18 A. It was a shakedown. They came in for money.
- Q. So they came in to physically take money from the home?
- 21 A. Yeah, under the guise that it was a drug lab.
- Q. Okay. So I want to just be clear. So the

  state troopers who entered your home believed

  there was a drug lab in the home and used that

  as an excuse to enter and remove money?

- A. Yeah, they were criminals. I had to keep a gun next to the door because if they came back, I was going to open fire on them.
- 4 Q. How old were you at that time?
- 5 A. Twenty-seven.
- 6 Q. And who were you living with?
- 7 A. My parents.
- Q. Okay. And was there any type of drug lab in the home or anything like that?
- 10 A. No, there wasn't.
- Q. So you've been arrested a couple times. Have you ever been convicted of a crime?
- 13 A. I don't think so, no.
- 14 Q. So I want to talk to you a little bit about
  15 the incident, and I apologize for jumping all
  16 over the place here. But you indicated to
  17 Attorney Libby that you make it a practice
  18 when you're walking in Little City to comment
  19 on people's dogs. Do you recall that
  20 testimony?
- 21 A. Yes, I do.
- Q. And I believe you testified that the reason
  you do that is because it's hard to meet
  people and there's a lot of people with dogs
  in Little City. Is that a fair classification

of your testimony?

A. Yes.

- Q. And so when you spotted Mr. Davis' dog, Piper,
  you made a comment, small talk to him,
  correct?
- 6 A. Correct.
  - Q. But then you testified that rather than engaging in the conversation, you and your friend kept walking; is that right?
- 10 A. Yes.
  - Q. And so despite making the effort to make the small talk and despite your understanding that people in Little City like their dogs, you didn't take the opportunity to speak with Mr. Davis and to greet Piper?
  - A. The dog was very excited. It was running around, it was running in the yard, it was running around Mr. Davis. He was very preoccupied with the dog. I was told to meet people here in, oh, Bangor and stuff, you make little small talk with them and just keep going, not to -- I guess not to irritate them or bother them. And we were just going to go for a pizza. So I wasn't going to, you know, wait for him to figure out what he was doing

with his dog. We just kept moving along.

- Q. I want to make sure I cover everything here.

  So jumping a little bit all over the place again, I understand that another way you have historically earned income is what you referred to as playing the stock market in your answers to interrogatories. Do you recall that?
- 9 A. Yes.

- Q. And when you say playing the stock market, what do you mean by that?
  - A. You put money in and follow, oh, trends and stuff and you see which ones have the most chance of moving upward, because I don't short stocks. I'm interested in -- that's too -- I'm not a brainiac, you know. So it's just, you know, to survive and make money. But you have to be focused with this. You can't be all over the place because you can lose all your money. It's a gamble.
  - Q. So you would consider it to be gambling?
    - A. Well, anything -- I mean, put it this way, anything that you put money into that has risk -- you know, even a business is gambling, I guess. But usually the stocks, if you put

- it in a good company, you're going to make

  money, you just keep it in there long enough.

  So blue chips always make money if you put it

  in long enough.
  - Q. And did you work historically with some type of brokerage firm or management company that would manage funds that you chose to invest in?
- 9 A. I got away from it -- I think it was maybe two
  10 firms that I was working with -- because they
  11 didn't seem very helpful. So --
- Q. And who were those firms that you were working with, if you recall?
- 14 A. I don't know. I'd have to dig in my records.
- 15 Q. Were they located in Bangor?
- 16 A. Florida.

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- 17 Q. Florida, okay.
- And do you currently have an active brokerage or stock account?
- 20 A. I have, like, probably two or three grand in the market now.
- 22 Q. And who manages that account?
- A. Well, it's just put in, oh, stocks, but I'm
  the one who does everything with it. I don't
  know what you mean by manage.

- Q. Okay. So you don't have, for example, a Fidelity account where you can --
- 3 A. Yeah, a Fidelity account.
- Q. Okay. And is anybody else named on that account or is that in your name?
- 6 A. Just my name.
- Q. And have you used this account we're speaking of historically for all of your investing?
- 9 A. Oh, I can't remember when I started the
  10 account, but I can dig it out if you folks
  11 really need this information.
- Q. Okay. With respect to your historic earnings from trading stock, did you report any earned income on your taxes?
- A. I'm not sure. I'd have to look on the account, you know, on -- work with my accountant or something, you know.
- Q. Okay. And then another thing you stated
  earlier is that because of the dog injury that
  you sustained that you had to take out a home
  equity line of credit on your primary
  residence. Do you recall talking about that?
- 23 A. Yes.
- Q. And can you remind me how much you took out or how big your line of credit is?

- Α. I think it was 112.
- 2 Okay. And how much is remaining on that line Q. 3 of credit?
- Oh, zip. It's gone. 4 Α.
- 5 So does that mean your line of credit is maxed Q. out? 6
- 7 Α. Yeah, yep.

- And what types of things have you used that 8 Q. 9 line of credit for?
- 10 Oh, let me -- one would be to get in to see a Α. 11 doctor in, oh, Portland, that would be one. 12 The other is to have the other doctor go 13 through my paperwork because I couldn't get any doctors up here that could go through 14 paperwork. My God. And the heating for the 15 16 house, the food. I had to pay people to be 17 around me -- after the attack, I was right out of my mind -- to try to get things together,
- but that's not going to happen. 19
- 20 Q. I want to break down what you're saying a little bit. 21
- 22 Α. Okay.

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23 I don't want to get too far ahead here. Q. 24 you said you had to pay for some doctors in 25 Portland. I believe I understood from your

answers to interrogatories that after 2021, you qualified for Medicare; is that right?

- A. I think so, yeah. I can find the exact dates.
- Q. And wouldn't it be possible to find medical providers that would be covered by Medicare?
- A. Yes, but I have to go down there. I have to go down there, I have to look around, I have to buy food, I have to have someone with me.
- Q. Okay. And when you say someone -- sorry to interrupt there. When you say someone with you, who is the people that you're referring to? What are their names?
- A. I'd have to go through these things, but I think John went with me one time. But after the attack, I have to have someone with me.

  So I have to pay people. I guess Bangor is one of those few places where --
  - Q. And I just want to be clear. I mean, are you using an agency that provides support people or are you talking about your friend, John, that you pay money to to sit with you? Can you elaborate?
  - A. John went with me to Portland, but after the attack, <u>I had assistants that I had hired.</u>

    And to be honest, these folks were more

concerned about my mental health and what was

going on than us getting anything done. We

spent a lot of time looking around to find

qualified doctors, and it was -- it was a bit

challenging. So they were more concerned

about my mental health than --

- Q. So I do have a couple follow-up questions for you. So the home equity line, do you recall approximately when you went ahead and requested that?
- 11 A. I think it was, like, two or three years ago.
- Q. Okay. Who was the bank that you went through to finance that?
- 14 A. Let me see. That was Camden National.

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- Q. Okay. Do you have a contact person that you worked with at Camden National?
- A. Well, she's been transferred to another bank,
  who was handling the loan and things like
  that.
- Q. So when you realized, Mr. Snow, that you wanted to take out a home equity line of credit, did you fill out an application online?
- A. I don't think so. I think I just wrote -wrote one out.

- Q. When you say that -- so you filled out an application and then gave it to the bank?
- A. I think so.

- Q. And did you have any communications with the bank about the application and, you know, when the fund might be available?
- 7 A. Well, they got back to me and told me that they okayed it.
  - Q. So you were able to communicate clearly with the bank for that purpose, safe to say?
    - A. Yeah, but one of -- the bank person

      afterwards, she had mentioned -- because I had

      someone move in to help me, and she didn't

      think that they were on -- after I had kicked

      this guy out -- and she said that she didn't

      think that he was on the level. And I said to

      her, Well, why didn't you tell me that before?

      But that's the way I guess people are around

      here.
  - Q. So I'm going to need some clarification. I
    think I missed the first part. You said he
    wasn't on a level or can you repeat that? I
    didn't quite understand what you were saying.
- 24 A. Well, he stole three of my credit cards.
  - Q. And when did that occur?

- A. Oh, I think that was prior -- about a year ago.
- $3 \mid Q$ . And what was --

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- 4 A. (Indiscernible, simultaneous speaking.)
- 5 Q. Sorry to interrupt. What was his name?
- A. Oh, I'm not discussing that right now. I'm going to discuss that with Chris first.
  - Q. Okay. So one of your complaints in this lawsuit is that you've maxed out this line of credit that you've had to use for your personal expenses related to the injury and you have indicated that a third party has taken a portion of that money or your credit cards. And so I'm just trying to figure out --
- 16 A. Yes. He took, I think it was, \$1,500 from me.
- Q. Okay. And did you make a claim with your credit card company?
- A. Yes. I took him to court. If you want the papers, I'm going to give them to Chris and you can look at it.
- MR. LARGAY: If I can inquire, Kady, for just a moment.
- Was it a small claims case that you filed or something?

1	THE WITNESS: Well, he took three of my
2	credit cards and he went to Diamonds with
3	them.
4	MR. LARGAY: Okay. Did you file a court
5	case?
6	THE WITNESS: That would be the DA
7	handled it.
8	MR. LARGAY: Did you file a civil case
9	for collection of that money?
10	THE WITNESS: No, no.
11	MR. LARGAY: Okay. And, Kady, was your
12	question as to who was that person?
13	MS. HUFF: Yes.
14	MR. LARGAY: Can you tell them that?
15	A. Oh, let me see. Daniel was his first name.
16	I'll have to dig it out. I'm kind of stressed
17	here, but I'll get it to you folks.
18	BY MR. LIBBY:
19	Q. And then I just have one final topic for you.
20	In your answers to interrogatories, you
21	indicate that you have \$20,000 worth of lab
22	equipment to turn out supplements. Do you
23	recall answering that interrogatory?
24	A. Yeah. It's probably I don't know exactly
25	how much it's worth now, but 20 or \$30,000

1 worth.

- 2 | Q. And when did you purchase that lab equipment?
- 3 A. When I was in Florida.
- 4 | Q. And when was that?
- 5 A. Oh, over the past decade, I'd say.
- 6 Q. So was it before or after 2018?
- 7 A. Before.

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- Q. And so you have had this \$20,000 in lab equipment for a substantial period of time; is that safe to say?
- 11 A. I guess, yeah.
- Q. And what kind of lab equipment are we talking about?
- A. Oh, rotary evaporators, Buchi rotary
  evaporators, vacuum pumps, circulators,
  reaction equipment, controllers.
- Q. Okay. And why did you purchase this lab equipment?
  - A. Because I want to set up a company. One of the molecules I'm really interested in, it tells, I think, five types of cancer to shut off. One of the types of cancer killed my father. And it's approved for treatments in -- it's FDA approved to treat -- I think it's basal skin carcinoma. So I wanted to get

- - Q. And so you were going to manufacture an FDA-approved drug in your home; was that your plan?
  - A. No. We were going to test the equipment there and see if we could get some accommodations and cooperation in the area to get something going. My late buddy, Dr. Young, was going to be oversight.
  - Q. Okay. Do you have any formal lab training?
  - A. Well, I went to college for organic chemistry and taught myself organic chemistry and worked in industrial chemistry for about three days because I found it was so nasty. So it's easier to hire a chemist. It's, like, you know, they know how to do it, I know what I want.
  - Q. Okay. And so the supplements or the drug that you were intending to manufacture you have not previously sold; is that safe to say?
- 24 A. No.

25 | Q. And you have no history of selling supplements

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        or other products; is that fair to say?
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        No, but it looks like a really good area to
    Α.
3
        get into. I got into publishing, I didn't
        know anything about publishing. A few of my
4
5
        friends didn't know anything about publishing.
        You just move ahead and deal with it. So it
6
7
        looks like it will be -- it's an exciting
8
        area.
9
        Okay. So I think that's all I have. I'm just
10
        going to skim my notes here to make sure I
11
        didn't miss anything.
12
             Do you have any social media accounts?
13
        No, I don't.
    Α.
        Do you have any -- do you have an email
14
    Q.
        address that you use?
15
16
        Yes, I do.
    Α.
17
        Okay. And aside from email, do you use any
    Ο.
18
        other platforms online?
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    Α.
        No.
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             MS. HUFF: That's all I have. I'm happy
21
        to turn it over to Sam if he has any
22
        questions.
23
             MR. JOHNSON: Thank you, just briefly.
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## EXAMINATION

BY MR. JOHNSON:

Q. My name is Sam Johnson, and I represent -- my firm represents the Smith family Real Estate Company who we've been referring to as the landlord today.

One of the benefits of going third is that much of what I would have asked is has already been covered; so this should be very brief.

With respect to my client, the landlord, prior to this incident with the dog occurring that we're talking about today, had you ever spoken with anyone employed by Smith Family Real Estate Company, LLC?

- A. Not that I know of.
- Q. And since this incident involving the dog,
  Piper, we're talking about today, have you
  spoken with anyone at Smith Family Real Estate
  Company, LLC?
- 21 A. Not that I know of.
- Q. Have you ever maintained a social media account?
- 24 A. Yes, I have.
- 25 Q. And what social media accounts did you have

109 1 and --I'm not discussing that. 2 MR. JOHNSON: Chris, is there a basis for 3 an objection or an instruction not to answer? 4 5 MR. LARGAY: I'm not instructing him not 6 to answer. The question is just what other --7 was it social media or email? MR. JOHNSON: So just, what social media 8 9 accounts did you have? MR. LARGAY: If you could tell him which 10 11 ones you had. 12 THE WITNESS: Okay. I had a Facebook. 13 Α. BY MR. JOHNSON: 14 What time period did you have Facebook for? 15 Q. I'm not sure. Probably when I was going crazy 16 Α. 17 after the dog bite. 18 Q.

- So did you create a Facebook because of this
- incident? 19 insular
- 20 Oh, well, Bangor is an insulated community. 21 People are very un-welcoming here. So I set 22 up the account hoping I would meet some people
- 23 here, but --
- 24 Q. So I guess to kind of be a little more pointed 25 in my question, do you recall about when you

1 set up your Facebook account, the date? I'm not exactly sure. I'm just thinking, you 2 know, between when the dog attacked me and 3 probably about a year ago maybe. 4 5 MR. LARGAY: Hold on a second. Sam, were 6 you -- did anyone else see him frozen? 7 THE REPORTER: He was frozen. MR. LARGAY: I think we missed some of 8 9 the question. 10 MR. JOHNSON: Sure. I apologize. I'll 11 ask the question again. BY MR. JOHNSON: 12 So with respect to the Facebook account we're 13 discussing, on what date did you set it up 14 initially? 15 I have no idea. I'd say after the dog attack 16 Α. 17 and probably up to maybe six months, a year 18 ago. 19 Okay. And was there a particular reason you Q. 20 deactivated the Facebook account? 21 Oh, people suck out there. You know, it's Α. 22 really a hostile format, and a lot of

people -- you know, to be honest, it's better

to go out hiking and meet people, you know, in

the real world. You know, honestly, I don't

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- think that it's very good for the body or the
  mind. You know, if I'm out there, I want to
  be in servers, reading, or PubMed, or doing
  something productive, not, you know -- but
  each to their own.
- Q. Was that Facebook account just under your full name, Otto Snow, or --
- 8 A. Yes.

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- 9 Q. And do you recall -- it sounds like -- at some
  10 point in or around or after this incident
  11 involving the dog and when you created the
  12 account, did you post about that incident
  13 online?
  - A. I think I might have put up a photo, but I took it down because people were offended.

    You know, people are easily offended. And folks thought, you know, it's better to try to do positive stuff than, you know -- so I pulled it down.
- Q. And when you say you posted a photo, was it a photo of your injury?
- 22 A. Yeah.
- Q. And is that a photo that you still have access to if you needed to get it?
  - A. Yeah. It was one of the photos that I think

Mr. Davis gave me. 1 Okay. Well, I believe 2 MR. JOHNSON: that's all for me, given all the other 3 questions that have been asked and answered. 4 So I don't know if that's prompted anything 5 6 from either of the other attorneys, but that 7 is all for me. So thank you. 8 MR. LARGAY: As Plaintiff's counsel, I 9 don't have any questions for Mr. Snow today. And I will get you guys the photo. 10 11 MR. LIBBY: Yeah, I just have a couple 12 quick follow-ups here. 13 FURTHER EXAMINATION BY MR. LIBBY: 14 15 Otto, when you were treated in the hospital 16 for the laceration from the dog --17 You're breaking up. Α. 18 Q. Okay. Sorry. Can you hear me now? 19 Α. Yep. 20 Q. When you were treated for the laceration to 21 your mouth from the dog incident, did you ever 22 make comments to some of the providers that 23 you wanted to, you know, shoot yourself with a 24 shotgun? 25 Oh, yeah. I got very, very suicidal after the Α.

1 dog attack. The police -- I get along with law enforcement. I grew up with law 2 3 enforcement. They came over and got me into the emergency room for a low-dose Valium. 4 5 I've never heard that before. And they were really good. They knew what it was like to 6 7 experience traumas. And then afterwards, I had to go to Portland to find someone who was 8 9 qualified to prescribe these medications and was familiar with it and severe trauma. 10

- Q. Okay. Did you ever make any type of threats like this before the dog --
- 13 A. No.

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- Q. <u>Have you ever had suicidal ideation before</u>
  this incident with the dog?
  - A. Well, my entire family died in Florida. So, you know, at times -- you know, I'm alone, but at that point, law enforcement had to intervene because I was, like, really out of it. But before that, you know, I -- I was just -- you know, you see your family die off one by one, you know, at times you say, what the hell?
- Q. So is it fair to say you did have thoughts of suicide prior to the incident with the dog?

A. Well, put it this way, I would mention it, but, you know, as far as I'm concerned, you know, a shotgun in my mouth to blow my brains out in the middle of a church and cover the place with blood, maybe these people would understand the hell that I've gone through.

That's why I've got to get, you know, some help by people who are really qualified, because I've never had that before, let me tell you.

I've got to be around folks that

understand trauma and, you know, connect me

with people who aren't going to poke at me or

gaslight me because of their, oh, politics.

So that's why I connected with Dr. Rosenbaum,

and I'll connect with folks who have plenty of

experience with it.

So if we're looking at suicide, I would say after that dog attack, I started thinking about taking a shotgun and blowing my head off in front of crowds of people so they'd know the suffering that I'm going through, what it opened up inside my mind. It's hell on earth at times, it really is. It took decades to get this stuff under control, decades.

- Q. So leading up to the incident with the dog,

  it's your testimony that all of this

  substantial emotional trauma was well

  controlled?
  - A. Yes, it was. I wasn't, like, screaming where
    I had to have law enforcement bring me to the hospital.
- 8 Q. When did that happen?

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- 9 A. Oh, I can get the dates on it, but it was
  10 right after the dog attack. I was -- you
  11 know.
- 12 Q. So, you know, we established that you have trauma going back to 1½ years of age, right?
- 14 A. Well, I don't know. We have the reports.
- I've seen wicked. We do know that the PTSD was started following the home invasion.
- Q. Okay. So that's at least 30 years ago, right?
- 18 A. Yeah, but the recent diagnosis is chronic
  19 severe PTSD.
- Q. Okay. And it wasn't chronic severe PTSD prior to the dog incident?
- 22 A. I have no record saying that.
- Q. Well, regardless of what the records say, what is your belief on that?
- 25 A. After the home invasion, I kept a handgun next

to my bed and one next to a door in case those law enforcement officers came back in. I was going to open fire on them. You've got to defend yourself. It took about a decade to get things under control. After the dog attack, I put a piece next my bed again. I have friends who talk with me and stuff; so it's calmed down quite a bit. I get along with law enforcement. They talk with me when I need them. So it's calmed down quite a bit.

- Q. When was the incident where you had to have weapons at your bedroom door and you thought you were going to have to shoot the police if they came in?
- A. That was in October of 1985.
- Q. You testified that your mom passed away in 2008, you got a huge inheritance, and you thought it was \$500,000, right?
- A. I'm not exactly sure. It could have been anywheres from 3 to 500. from \$300k to \$500k
- 21 Q. Okay.

- 22 A. I think it was 2007.
- Q. All right. So you have about \$3,000, maybe,
  left in the stock market. What happened to
  all that money? Where did it go?

A. I don't know. This place -- you can call places and you try to get assistance with things, and all you do is waste your time.

And I had to hire people to help me out because I just can't, you know, pull this thing together. And, you know, it's going -- money just vanishes. Instead of being put to something to get substantial, you know, it just vanishes as you're trying to get something done, dealing with doctors who, you know, would be better off to go back to medical school. You know, it vanishes, it just vanished.

And, you know, if I would have had some sort of focus, I would have had the publishing going and at least, you know, get some sort of production happening, but, you know, I'm all over the place now. It's incredible. I've never had this like this. That's why I felt comfortable with law enforcement. I said, I've never had traumas stream out of me like this, and they're not stopping. So they would sit with me.

So I'm just going to keep moving forward with it. I'm not going to tolerate being

pushed around and saying something didn't

happen when it did, and then folks -- you

know, this isn't right.

- Q. So you don't know what happened to those thousands and thousands of dollars that you had invested in the stock market?
- A. No, I don't. I put money into the house to try to get it ready. And I have been hiring people to try to help me do something, and a couple of them, they said that they wanted me to get some help with all the traumas that were going on. So we're trying to find doctors. Two of them were -- I had one going with me into the doctor's office because I was being treated so poorly, but a few of the docs came out and they said it's just too complex for them.
- Q. Right. Well --

2.4

19 A. That's where the money went, I guess.

20 MR. LIBBY: Okay. Thank you, Otto. I
21 appreciate your time today. Those are all the
22 questions I have for you.

MR. LARGAY: Anyone else?

We didn't discuss this, but you have the right to read the deposition transcript and

1	correct any it's usually a typographic
2	errors, not substantive testimony. Do you
3	want do that first or do you need to read
4	it quick and get it back to me within, say, a
5	week of my getting it. Or do you want to
6	waive that right, accept the transcript as it
7	will be transcribed, and
8	THE WITNESS: Let me just glance at it.
9	Any way I could get a video of this?
10	MR. LARGAY: No.
11	THE WITNESS: No?
12	MR. LARGAY: No.
13	THE WITNESS: Well, does someone have a
14	copy of it?
15	MR. LARGAY: It's only being audio
16	recorded and I'm sorry, Ms. Smith, it's not
17	video recorded, is it?
18	THE REPORTER: No. I get rid of the
19	video recording, I just do the audio.
20	MR. LARGAY: Right. Okay. So it's
21	destroyed; so nobody videos. So Ms. Smith
22	will type up what she has now taken down
23	through stenography.
24	THE WITNESS: Okay.
25	MR. LARGAY: Okay. So I just want know

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if you're going to read the transcript.
1
              THE WITNESS: Yeah, I'll glance through
2
3
         it.
              MR. LARGAY: We'll read and sign.
 4
              (The proceeding ended at 4:00 p.m.)
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## STATE OF MAINE

I, Tammy M. Smith, a Notary Public in and for the State of Maine, do hereby certify that pursuant to notice there came before me on September 27, 2022, the following-named person to wit: OTTO SNOW, who was duly sworn to testify to the truth and nothing but the truth; that he was thereupon carefully examined upon his oath and his examination reduced to writing under my supervision; that this deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney nor counsel for, nor related to, nor employed by any of the parties to the action in which this deposition is taken, and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in this action.

IN WITNESS WHEREOF, I have hereunto set my hand this 9th day of October, 2022.

Tammy M. Smith

Notary Public/Court Reporter

My Commission Expires: January 12, 2026

Christopher R. Largay, Esq. LARGAY LAW OFFICES, P.A. 293 State Street Bangor, Maine 04401

RE:

OTTO SNOW

VS.

DORA SMITH FAMILY REAL ESTATE COMPANY, LLC c/o BARBARA NICHOLAS and DEBRA CONLEY

Enclosed please find your copy of the deposition of **OTTO SNOW** taken in the above-mentioned action on 27th day of September, 2022. Also enclosed is the original signature page and a sheet for corrections.

Please have **OTTO SNOW** read your copy of the deposition and sign the original signature page before a Notary Public. If there are any corrections he wishes to make, they should be made on the enclosed correction sheet. **DO NOT MARK ON THE DEPOSITION**.

Please send a copy of the signed original signature page and correction sheet to other counsel within 30 days.

Thank you.

DATE	ĺ	OTTO SNO	W	
At	in	said Co	unty of	, this
day of		, 2022	personal	ly
appeared <b>OTTO</b>	SNOW, and	he made	oath to	the truth
of the foregoi	.ng answer	s by him	subscrib	ed.
Before me,				, a
Notary Public				
My Commission	Expires:			

'aqe	Line	Change	from	this	То	this

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