

NEIL HESLIN,  
*Plaintiff,*

v.

ALEX E. JONES, INFOWARS, LLC,  
FREE SPEECH SYSTEMS, LLC, and  
OWEN SHROYER,  
*Defendants*

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IN THE DISTRICT COURT OF  
  
TRAVIS COUNTY, TEXAS  
  
261<sup>st</sup> JUDICIAL DISTRICT

**DEFENDANTS’ SECOND SUPPLEMENT TO MOTION TO DISMISS  
UNDER THE TEXAS CITIZENS PARTICIPATION ACT**

COME NOW, Defendants Alex E. Jones, Infowars, LLC, Free Speech Systems, LLC, and Owen Shroyer (collectively, the “Defendants”), and hereby file this, their Second Supplement to Motion to Dismiss Under the Texas Citizens’ Participation Act and in support thereof would respectfully show this Honorable Court as follows:

In Plaintiff’s Response he attaches the declaration of Fred Zipp on which he relies and argues on page 13 of his Response that it was only *after* the June video when he began to be exposed to ridicule from “conspiracy fanatics.” This is not true.

Mr. Zipp states that *after* the June video, Mr. Heslin was accused of being a fireman who was killed in the 9/11 attack. He says this without any evidence and for good reason. Mr. Heslin had been the subject of this claim *long before the June video*, since at least October of 2015.<sup>1</sup>

Zipp also says that it was *after* the June video that Mr. Heslin was accused of being one of the “illuminate.” However this is again false as the very screenshot that Zipp uses to illustrate this was published immediately after the Kelly interview and *before* the June video.<sup>2</sup>

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<sup>1</sup> See Affidavit of David Jones and the attached Exhibit 1.

<sup>2</sup> See Affidavit of David Jones and the attached Exhibit 2.

Unfortunately, long before Defendants said anything about Mr. Heslin, he was already the subject of conspiracy theory ridicule. Some said they even posted such claims on his own Facebook page.<sup>3</sup>

These and many other claims were posted and circulated by many people and on many websites long before Mr. Heslin was ever mentioned by any of the Defendants. Thus, it is more likely than not that whatever damages and injuries he has suffered from claims of conspiracy theorists were caused long before the actions complained of in this suit. Mr. Heslin has not submitted clear and convincing evidence that his damages and injuries were proximately caused by anything that Defendants are accused of doing.

#### **PRAYER**

WHEREFORE PREMISES CONSIDERED, Defendants respectfully requests that this honorable Court grant Defendants' Motion to Dismiss under the Texas Citizens Participation Act in its entirety and the Court grant them such other and further relief as the Court deems equitable, just and proper.

RESPECTFULLY SUBMITTED,

GLAST, PHILLIPS & MURRAY, P.C.

/s/ Mark C. Enoch

Mark C. Enoch  
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14801 Quorum Drive, Suite 500  
Dallas, Texas 75254-1449  
Telephone: 972-419-8366  
Facsimile: 972-419-8329  
fly63rc@verizon.net

ATTORNEY FOR DEFENDANTS

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<sup>3</sup> See Affidavit of David Jones and the attached Exhibit 3.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of August, 2018, the foregoing was sent via efiletxcourts.gov's e-service system to the following:

Mark Bankston  
Kaster Lynch Farrar & Ball  
1010 Lamar, Suite 1600  
Houston, TX 77002  
713-221-8300  
[mark@fbtrial.com](mailto:mark@fbtrial.com)

*/s/ Mark C. Enoch*  
\_\_\_\_\_  
Mark C. Enoch

NEIL HESLIN,

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ALEX E. JONES, INFOWARS, LLC,  
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*Defendants*

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

261<sup>st</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF DAVID JONES**

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

BEFORE ME, the undersigned notary public, on this day personally appeared David Jones, known to me to be the person whose name is subscribed below, and who on his oath, deposed and stated as follows:

1. My name is David Jones. I am over the age of 21 years, have never been convicted of a felony or crime involving moral turpitude, am of sound mind, and am fully competent to make this affidavit. I have personal knowledge of the facts herein stated and they are true and correct.

2. In preparing for this affidavit, I reviewed internet websites, articles and videos published on the internet and found several that are relevant to the issues in this case.

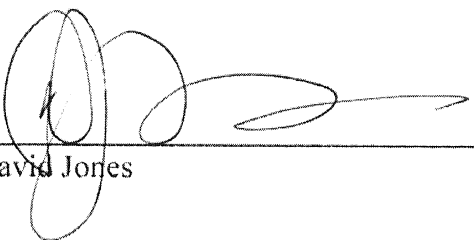
3. This video and these articles/screenshots were downloaded and/or printed directly from the identified internet website. All of the attached exhibits are true and correct copies of the online articles and videos.

4. Attached to this affidavit marked as Exhibit 1 is a true and correct copy of a screen shot of a web page article located at the url address: <https://plus.google.com/+OzzybinOswald/posts/BM9UxYu7bKT>. This is a true and correct copy of that page as of the date of this affidavit.

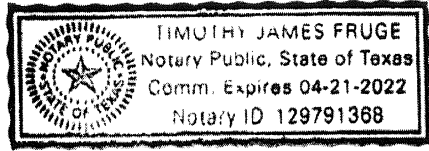
5. Attached hereto marked as Exhibit 2 is a true and correct copy of a screen shot of a web page article located at the url address: <http://theconspiracyzone.podcastpeople.com//posts/comment/31184>. This is a true and correct copy of that page as of the date of this affidavit.

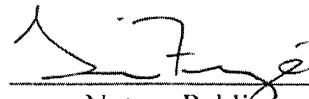
6. Attached hereto marked as Exhibit 3 is a thumb drive containing a true and correct copy of a video posted at the url address: <https://www.youtube.com/watch?v=V4cgKombuGE>. This is a true and correct copy of that video as of the date of this affidavit.

Further Affiant Sayeth Not.

  
\_\_\_\_\_  
David Jones

SWORN TO and SUBSCRIBED before me by David Jones on August 30, 2018.



  
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Notary Public in and for  
the State of Texas

My Commission Expires:

4-21-2022

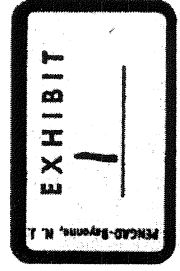
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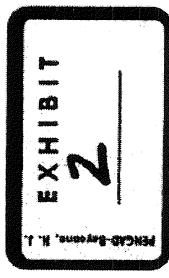
Oct 18, 2011

Two faces of 9/11 victim Thomas Kelly (top and left) vs. 2 faces of grieving Sandy Hook father Neil Heslin (bottom right).




41 2 <

Now let's look at the man Megyn Kelly interviewed this last Sunday and was supposed to be the parent of one of the murdered children at Sandy Hook. His alias is Neil Heslin and he claims his son Jesse was shot in the head and was buried with him at his side. The problem is we've seen him before. He played the part of a firefighter that supposedly died on 9/11 by the name of Thomas Richard Kelly. **THIS MAN IS AN ACTOR!** As a matter of fact, Alex Jones should know this man is an actor! Jones should have exposed this man as an actor but he made no mention of it. Why? Either he knows about it and is covering it up or he knows nothing about it. If he doesn't know, then what good is he? I mean, if we at The Conspiracy Zone know about it, then why doesn't Alex Jones?

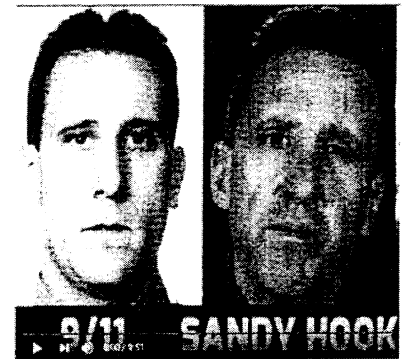


**Thomas Richard Kelly**

- Firefighter **WTC - 9/11**
- Fire Department of New York
- New York
- Age: 39
- Year of Death: 2001



Here is a picture of him as Thomas Richard Kelly and Neil Heslin:



As we know the Illuminists like to mock us when they name these people so let's look at what Neil Heslin says coded.



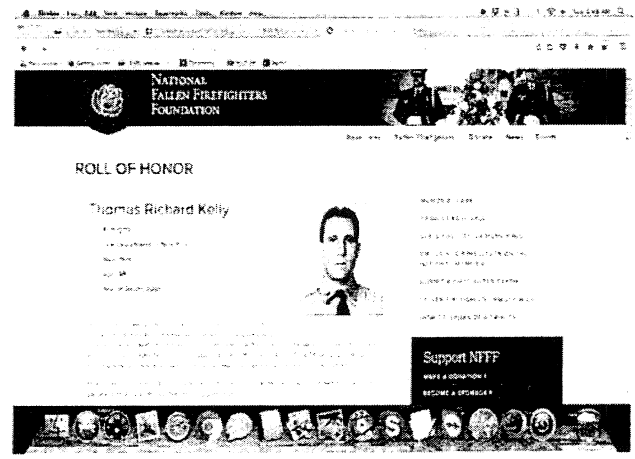


these people so let's look at what Neil Heslin says coded:



Yea, he's LYIN' alright!

Let's look at other pictures to show you that this is in fact an actor playing two parts: Below, he's Thomas Richard Kelly who died on 9/11, 2001.



Now here he is playing the part of the father (Neil Heslin) of a murdered child that was allegedly Killed at Sandy Hook:

