

1 Q. Yes, sir.

2 A. Yes. It had risen quite a bit then.

3 Q. And you would not have been able to get back  
4 across to your house on foot by then, correct?

5 A. Correct.

6 Q. Okay. Is it true that at some point between  
7 2:21 and 3:00 a.m., your wife evacuated the house you  
8 were staying in with your children?

9 A. That's not true.

10 Q. Why is that not true?

11 A. She evacuated later than that.

12 A. What time?

13 Q. She sent me her last text at 3:15.

14 Q. Okay.

15 A. Asking me to move.

16 Q. What do you mean "asking me to move"?

17 A. "Should I move?," is what she said.

18 Q. What did you tell her?

19 A. I didn't respond.

20 Q. Okay. Why not?

21 A. Because I was evacuating campers.

22 Q. Okay. So, your wife asked you if she should  
23 move at 3:15. Did she, in fact, move?

24 A. Yes, she did.

25 Q. Okay. What happened?

1           A.     She took my four children to my mother's  
2 house nearby.

3           Q.     And then they got your mother out?

4           A.     Yes.

5           Q.     And then what happened?

6           A.     Um, I don't want -- I mean, you want me to  
7 tell you her story?

8           Q.     I want to know what you know.

9                     Maybe I can say it again. Your mother  
10 left her house, correct?

11          A.     My -- my mother and my wife and my children  
12 and one other staff member were in the living room of  
13 her house when her double doors burst open.

14          Q.     Okay.

15          A.     And they had to break a separate window to  
16 climb out, and then they walked across the staff  
17 parking lot with all the cars floating around them.

18          Q.     Okay. And at some point they met your  
19 brother Brit --

20          A.     Yes.

21          Q.     -- correct?

22                     And he picked them up in the truck?

23          A.     This is -- yes, this is what I've heard.

24          Q.     And where do you understand they went from  
25 there?

1           A.     They went to his house and to, I don't know  
2 the exact order, but they went to his house and up to  
3 the cabin close to James Hall.

4           Q.     Okay. So, they evacuated to higher ground?

5           A.     Yes.

6           Q.     And they all survived?

7           A.     Yes, they did.

8           Q.     Okay. Thank you.

9                     All right. Let's go back and talk about  
10 a few other things before we get into some of the  
11 things Mr. Watts was going over.

12                    Can we show Exhibit 4.

13                    On July 11th, 2025, one of the families  
14 sent a request for preservation of evidence to Camp  
15 Mystic Legal Department. Who was running the legal  
16 department for y'all at that time? Is that your  
17 brother?

18           A.     I don't know.

19           Q.     You know that at some point the camp got this  
20 letter, correct?

21           A.     Yes, I do remember it.

22           Q.     Okay. You also know that, on the morning of  
23 July 4th, we were involved with a disaster scene and  
24 recovery effort, correct?

25           A.     That who was involved?

1 Q. Okay. So, let me stop you. You improvised  
2 and created a plan that night. Correct?

3 A. No, we have done this before.

4 Q. You've had to evacuate campers before?

5 A. I haven't, but my father had.

6 Q. Where is that written plan?

7 A. I don't know.

8 Q. Did you train campers about it before  
9 July 4th?

10 A. Train the campers? No.

11 Q. Sure.

12 Did you train counselors?

13 A. We trained counselors on keeping their girls  
14 away from the floodwaters.

15 Q. Okay. If there was a written evacuation plan  
16 in existence on July 4th, where would I find it?

17 A. Sorry?

18 Q. If there was a written evacuation plan in  
19 existence on July 4, 2025, where is it? Where can I  
20 find it?

21 A. I don't know.

22 Q. Tell us what it said.

23 A. It wasn't -- I don't -- everything was  
24 destroyed. I don't know if there was a written one or  
25 not.

1 Q. Okay. As you sit here today you still don't  
2 know?

3 A. I don't.

4 Q. Can you tell the judge what you think it  
5 said?

6 A. No, I don't want to guess.

7 Q. Did it identify an evacuation safe site or a  
8 muster site?

9 A. I believe Rec Hall was the plan.

10 Q. Not the one you decided on July 4th, I want  
11 to know before the flood on July 4th.

12 A. Correct.

13 Q. Where was the identified muster site?

14 A. Rec Hall.

15 Q. Where does it say that?

16 A. I don't know. I don't have that.

17 Q. There is no such plan, there never was, was  
18 there, ever?

19 A. There's not true.

20 Q. You never trained a single counselor about  
21 that, did you, ever.

22 A. We -- I don't know.

23 Q. Sir, you were the director of the camp that  
24 day, correct?

25 A. Yes, I was.

1 Q. And you, as you sit here eight months later,  
2 having reviewed all of this, you can't even tell us  
3 whether there was a written plan at all, right? Right?

4 A. I don't know.

5 Q. You don't know but you want to be in charge  
6 of reopening the camp?

7 A. Do I want to be in charge of Camp Mystic  
8 Cypress Lake?

9 Q. Any of them. Let me --

10 A. I don't know how to answer that.

11 Q. Let me help you. Before you set off in  
12 trying to reopen a camp, don't you think we ought to  
13 figure out what happened at your camp on July 4th?  
14 Isn't that fair?

15 A. I'm sorry, can you repeat that again?

16 Q. Sure. We'll come back.

17 A. I'm really having trouble keeping up with  
18 you.

19 Q. Okay. I understand.

20 Let's look at it a different way. Let's  
21 talk about evacuations.

22 Can you back out of that, Mike, and show  
23 me fire.

24 Your dad created this document, right?  
25 Most likely?

1 A. They have their own office at Cypress Lake.

2 Q. Isn't it true that about 90 percent of the  
3 operations for Cypress Lake also occurred here at the  
4 Main Office?

5 A. What operations?

6 Q. Whatever you do in the business,  
7 recordkeeping, bookkeeping for employees, logs, pay  
8 records, that type of thing.

9 A. We do a lot of -- lot of the, I mean, we used  
10 to do a lot of the, I guess you could say, bookkeeping  
11 in the Guadalupe office for both camps.

12 Q. Okay. So, when we were -- let's go to  
13 July 3rd, for example. Just a normal day. If  
14 announcements are going to be made to campers, that  
15 happens there from the Main Office, correct?

16 A. Yes, sir. Just for Guadalupe.

17 Q. Okay. So, at any point in time if you wanted  
18 to give notice to campers about any issues, you could  
19 get on the PA and the speakers around camp would  
20 broadcast whatever you tell them, correct?

21 A. At any point in time?

22 Q. Yes. As long as you have power.

23 A. You could, yes, sir.

24 Q. Okay. Did the campers have walkie-talkies in  
25 their cabins?

1           A.     No, not -- they -- we've given them to  
2 counselors for certain activities, when they go hiking  
3 and things like that, but not in their cabins.

4           Q.     So, when children went to bed with their  
5 counselors in the cabins, there were no walkie-talkies.  
6 You couldn't communicate with them that way. Correct?

7           A.     Correct.

8           Q.     Okay. The only way you would be able to  
9 communicate with them is either through making an  
10 announcement on the loud speaker or physically going to  
11 the cabin and having a discussion with them, correct?

12          A.     Yes, I believe so.

13          Q.     Okay. So, do the two camps share the same  
14 employees?

15          A.     Most -- most employees, no. You know, we're  
16 right next door to each other, so we can -- we can, you  
17 know, run things over. But it's, for the most part, a  
18 completely independent camp.

19          Q.     Okay. Well, you share maintenance crew,  
20 correct?

21          A.     Yes. Some are more dedicated to one side  
22 than the other.

23          Q.     But not exclusively?

24          A.     No, no, sir.

25          Q.     Okay. There's no border?

1 A. Yes.

2 Q. Okay. So, just to be clear, you had security  
3 cameras around the camp, but those cameras didn't  
4 provide a feed to y'all in the office so you could  
5 monitor actually what was going on?

6 A. You could.

7 Q. Okay.

8 A. The way -- so, you had the hard-drive is  
9 saving the videos, but you could watch the live feed  
10 from any computer within the camp if you knew how to  
11 log in correctly .

12 Q. Okay. So, take me to July 3rd, the night of  
13 July 3rd, say ten o'clock, onto the morning of  
14 July 4th. Was somebody watching those camera feeds in  
15 the office?

16 A. There was always a live camera feed of the  
17 front gate in the office, but it --

18 Q. Who was monitoring it?

19 A. Who was monitoring?

20 Q. Yes.

21 A. Nobody was in the office at that point, in  
22 the back office.

23 Q. So, you had the ability to monitor what was  
24 happening around the camp, if water was rising or  
25 causing a problem, but nobody was actually doing that?

1           A.     I don't believe you could monitor the flood  
2 with the security cameras.

3           Q.     Well, could you see what the cameras would  
4 show?

5           A.     Yes, the -- yes, could you see what the  
6 cameras would show.

7           Q.     Okay. But no one was actually monitoring  
8 that, to your knowledge?

9           A.     No, sir.

10          Q.     No, sir, I'm correct, nobody was actually  
11 monitoring it?

12          A.     Not in the -- not at night in the office, no,  
13 sir.

14          Q.     Okay. What about in one of the homes?

15          A.     No.

16          Q.     Why not?

17          A.     Was somebody watching the live feed?

18          Q.     Yes.

19          A.     I -- I actually tried to look at it  
20 when -- when I got the call from the gatekeeper, but I  
21 couldn't pull it up.

22          Q.     Where were you?

23          A.     I was in the office.

24          Q.     What time was that?

25          A.     That would have been right before 2:00 a.m.,