

1 IN THE CIRCUIT COURT OF SAINT LOUIS COUNTY

2 STATE OF MISSOURI

3

4 MOUNA APPERSON)

5 f/k/a NICHOLAS APPERSON,)

6 Plaintiff,)

7 vs.) No. 19SL-CC00805

8 NATASHA KAMINKSY,)

9 ADRIAN NORMAN and RODNEY)

10 BROWN,)

11 Defendants.)

12

13 VIDEO-RECORDED DEPOSITION OF NATASHA KAMINSKY

14 TAKEN ON BEHALF OF THE PLAINTIFF

15 NOVEMBER 3, 2022

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copy

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11 Defendants.)

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13

14 Deposition of NATASHA KAMINSKY, produced,
15 sworn and examined on the 3rd Day of November, 2022,
16 between the hours of 10:03 a.m. and 2:08 p.m. at the
17 offices of Growe, Eisen, Karlan, Eilerts, 120 S.
18 Central Avenue, in the City of Clayton, State of
19 Missouri, before Rebecca Brewer, Registered
20 Professional Reporter, Certified Realtime Reporter,
21 Missouri Certified Court Reporter, within and for the
22 State of Missouri.

23

24

25

1 IT IS HEREBY STIPULATED AND
2 AGREED by and between counsel that this
3 deposition may be taken in shorthand by Rebecca
4 Brewer, Certified Court Reporter; and the
5 signature of the witness is waived.

6 * * * * *

7 (Starting time of the deposition: 10:03 a.m.)

8 THE VIDEOGRAPHER: This is the video
9 deposition of Natasha Kaminsky. Today's date is
10 November 3rd, 2022. The time is 10:03 a.m. This
11 is the case of Mouna Apperson, formerly known as
12 Nicholas Apperson, versus Natasha Kaminsky, Adrian
13 Norman, and Rodney Brown. This case is pending in
14 the Circuit Court of St. Louis County, State of
15 Missouri, Case No. 19SL-CC00805. Counselors, will
16 you please state your appearance?

17 MR. KERSHMAN: John Kershman for Mouna
18 Apperson.

19 MS. KELLERMAN: Teneil Kellerman on behalf of
20 Natasha Kaminsky.

21 MR. BUTTERFIELD: Michael Butterfield for
22 Adrian Norman.

23 THE VIDEOGRAPHER: My name is Ed Foppe and the
24 court reporter is Rebecca Brewer and she will now
25 swear in the witness.

1 NATASHA KAMINSKY,
2 Of lawful age, produced, sworn and examined on
3 behalf of the PLAINTIFF, deposes and says:

4 EXAMINATION

5 BY MR. KERSHMAN:

6 Q Will you please state your full name?

7 A Natasha Kaminsky.

8 Q And may I refer to you as Tasha?

9 A Yes.

10 Q My name's John Kershman. I represent the
11 plaintiff, Mouna Apperson, in this case. I'm going to
12 be -- first, have you ever had your deposition taken
13 before?

14 A No, never.

15 Q Okay. So I'm going to be asking you a series
16 of questions. If there's a question that you don't
17 understand or you need me to repeat it, you'll let my
18 know. If you answer my question, we're going to presume
19 you understood that, is that fair?

20 A Yes.

21 Q And if you need a break, by all means ask and
22 we'll break. We're not necessarily here to torture you,
23 so -- so, I'm going to start with how long have you
24 lived at your current address?

25 A A year and a half, almost.

1 Q And do you own or rent that property?

2 A I own it.

3 Q And what is the extent of your education?

4 A I have a master's degree.

5 Q From where?

6 A Brandeis University.

7 Q When did you graduate?

8 A 2012.

9 Q And what do you have a degree in?

10 A Near-eastern and Judaic studies.

11 Q Are you currently employed?

12 A I'm in between jobs.

13 Q What did you do before?

14 A I was the director of development for the
15 Asthma and Allergy Foundation of America.

16 Q Where is that located?

17 A The Delmar divide.

18 Q And how long did you work there?

19 A A little less than a year.

20 Q What was your position?

21 A Director of development.

22 Q You said that. Sorry. Who was your
23 supervisor there?

24 A Chris Martinez.

25 Q What was the nature of the work that you did

1 there?

2 A Fundraising for children with asthma.

3 Q I want to direct your attention, first, to
4 Exhibit 9. This exhibit contains messages between you
5 and Blithe De Carona, all of which were provided to me
6 by your attorneys during discovery, so let's look at
7 Page 1, which is entirely redacted, is that correct?

8 A Yes.

9 (Exhibit 9 identified.)

10 Q All right. How do you know Blithe?

11 A I know Blithe because she lived in Radix House
12 and reached out to me.

13 Q She lived in Haddocks House, is that what you
14 house?

15 A Radix House.

16 Q Radix House. And how long did she live there
17 that you're aware of?

18 A I don't know.

19 Q And I'm going to point now to Page 2, where it
20 starts with, "Let's just expose this and be done." You
21 see that up there?

22 A Yes, sir.

23 Q To what are you referring here?

24 A I do not recall.

25 Q And let's go down, take a look at the bottom

1 of Page 2; "gave it to my lawyer." Gave what to your
2 lawyer?

3 A A recording.

4 Q All right. So these redacted messages have to
5 do with this recording?

6 A I don't know.

7 Q It's possible that they do?

8 A I don't know.

9 Q Is it possible that they do?

10 A It's possible.

11 Q All right. Go to Page 3, please. So here you
12 have -- you can see, it says, Also, "Jeffery is being
13 hideous and no one is surprised." Do you see that
14 there?

15 A Yes.

16 Q Who is Jeffery?

17 A Jeffrey's also known as Dhoruba Shakur. I
18 believe his name's Jeffery Hill.

19 Q And how do you know Jeffery Hill?

20 A I really don't.

21 Q Okay. Can you tell me why you think Jeffrey's
22 being hideous?

23 A Jeffery was in possession of a recording that
24 he refused to give to my lawyer and just generally was
25 unpleasant towards me.

1 Q And when did you first have an interaction
2 with Jeffery?

3 A Sometime in the fall of 2018.

4 Q How many interactions did you have with
5 Jeffery?

6 A I do not recall.

7 Q Did you e-mail them?

8 A No, I never e-mailed Jeffery.

9 Q Was it only verbal communication you had with
10 them?

11 A I messaged Jeffery on Facebook.

12 Q In that message on Facebook you asked for
13 video?

14 A I asked for a recording.

15 Q Okay. To which they said no. And to which
16 you described here as they're being hideous. Let's look
17 at Page 3 of the same exhibit. And starting with where
18 it says, "I know they did you dirty, but they want to
19 make the story about Nick and they need to talk to more
20 Radix people," do you see that there?

21 A Yes.

22 Q What all are you -- when you all are referring
23 to Nick, that is the plaintiff, Mouna Apperson, correct?

24 A Yes.

25 Q And who is or who are the "they" that you are

1 referring to?

2 A I'm not sure. That looks like I'm referring
3 to Jeffery.

4 Q To Jeffery. And, again, we have some more
5 redacted messages here. Were these in response to you
6 talking about Jeffery and Mouna?

7 A I don't recall.

8 Q Is it possible that they are?

9 A It's possible.

10 Q And just tell you, Pages 4 through 17 are
11 redacted. Do you recall what you were talking with
12 Blithe about?

13 A I do not recall.

14 Q Now, when you say you do not recall, does that
15 mean you don't know or that you don't remember?

16 A I don't remember.

17 Q So let's take a look at Page 18, the second
18 line. Can you please read that, starting at "when did"?

19 A "When did Nick meet with you at the library or
20 wherever and say I lied?"

21 Q So Blithe mentioned this to you above in the
22 redacted section, is that fair to say?

23 A Yes.

24 Q Why did you have this redacted?

25 A I did not have any control over what was

1 redacted.

2 Q Why do you need to know when they met?

3 A I do not recall.

4 Q So, do you remember what you were planning to
5 do with this information?

6 A I think I was simply curious.

7 Q What did you end up doing with this
8 information?

9 A With this specific information?

10 Q Um-hmm.

11 A I don't recall doing anything with it.

12 Q So when you say that, you're saying you don't
13 remember, right? Let's move ahead and take a look at
14 Page 115. All right. Start at the last visible message
15 from Blithe, which reads, "Right, I know it won't be
16 absolute, but I feel like it's still enough knowledge to
17 get Nick worried." You see that, correct?

18 A Yes.

19 Q All right. Let's look now at Page 114. And
20 there's only one sentence from you that is not redacted
21 on this page, is that correct?

22 A Yes.

23 Q You and Blithe are talking about Mouna in the
24 redacted portions as well, correct?

25 A I do not recall.

1 Q From the last visible line about getting Nick
2 worried on Page 115 to the visible message on 116, "none
3 of this surprises me," you are all talking about
4 something other than the subject of Mouna Apperson?

5 A I'm sorry, I don't understand the question.

6 Q Is it possible that those redacted sections
7 include you all talking about Mouna Apperson?

8 A It's possible.

9 Q Back to the first visible line on 116 by
10 Blithe. You then responded with, "Not to" -- and I'm
11 going to probably mispronounce these names, I
12 apologize -- "Tishaura Jones," "Not to Bruce Franks,"
13 "Not to Jill Stein" and then on top of 117, "Not to Cory
14 Bush." What do you mean when you say "not" to those
15 particular people?

16 A I do not recall.

17 Q And this -- so you were definitely having this
18 conversation about Mouna and you were saying none of
19 this -- none of this surprises -- surprises that person,
20 but then you're alluding to that -- are these folks not
21 supporting your position; that it doesn't surprise or
22 does surprise these folks? I don't know. What are you
23 mentioning? Why are you even talking about those
24 people?

25 A I don't recall.

1 Q And so I just want to make sure you understand
2 that I'm -- purpose here is so I can know what you're
3 going to talk about at trial. So you understand, at
4 trial, you're going to suddenly remember this and I get
5 to refer to this deposition, right? So, as you
6 recall --

7 MS. KELLERMAN: I'm going to object -- I'm
8 going to object. I think this is improper for a
9 deposition. If you have a question for her and an
10 answer, especially based on your client's
11 presentation yesterday where he refused to say, well,
12 I can't remember all that because it's just too much
13 to almost everything he was asked. So if you want to
14 ask her a question and let her answer it, that's
15 fine. Obviously you're about to file a motion
16 regarding redactions. We'll take that up with the
17 court. But if you want to ask my question -- my
18 client a question, she will answer to the best of her
19 ability.

20 Q (By Mr. Kershman) All right. I'll direct
21 your attention back to Page 117, the third line down
22 starting with "the only," do you see that?

23 A Yeah. Yes.

24 Q Can you please read that?

25 A "The only political gift they have ever made."

1 Q How do you -- you're referring to Mouna
2 Apperson, correct?

3 A Yes.

4 Q How do you know whether that was the only
5 political gift they ever made?

6 A I don't recall the context of this
7 conversation, so I'm not able to answer that question.

8 Q Well, there's a statement. You made a
9 statement and the statement -- you're making a statement
10 that that is the only political gift ever. So I'm just
11 asking you how would you know that.

12 A An MEC report.

13 Q A what now?

14 A An MEC report.

15 Q And what is that?

16 A MEC report is what politicians who are running
17 for seats put out to show who has given them money.

18 Q And you reviewed these every single time
19 they're submitted by every single politician?

20 A Only by the politicians I care about.

21 Q And for how long had you done that? From what
22 year to what year?

23 A I've been reviewing them for -- for years. I
24 can't tell you how many years.

25 Q So this is back in 2017? You were reviewing

1 them in 2017?

2 A Yes.

3 Q Were you reviewing them in 2010?

4 A No.

5 Q Do you have copies of all of these that you
6 claim that you reviewed?

7 A No.

8 Q Do you have any other access or know how to
9 access them?

10 A They're all online.

11 Q They're all what? Sorry.

12 A All MEC reports are supposed to be online.

13 Q Okay. So, let's take a look at 117, where it
14 says -- you're saying Nick, meaning Mouna, hasn't
15 actually donated crap to any legally-recognized
16 organization. How do you know whether or not Mouna has
17 donated to any legally-recognized organization?

18 A I don't remember the context of what was going
19 on in this conversation or why I said that.

20 Q Did you have access to all of Mouna's
21 financial records prior to December 1st, 2017?

22 A No.

23 Q Did you have access to all of Mouna's long
24 form tax returns prior to December 2017?

25 A No.

1 Q That's no?

2 A No, sir.

3 Q And I was going to say -- and I'm bad with
4 this, too, which is we have to make sure that we don't
5 talk over each other so she can get this all done. So I
6 apologize if I talk over you. Is it -- is it accurate
7 to say you have no idea whether or not either of those
8 statements about Mouna making donations that you made is
9 true?

10 A I believe at the time I believed it to be
11 true. I don't know why I did that.

12 Q Is it fair to say, as you look at it today,
13 that you misrepresented this information to Blithe?

14 A I did not intentionally misrepresent
15 information to Blithe.

16 Q Continue down that same Page 117, can you read
17 the next line, at 2:31 p.m.?

18 A "If they have wealth, it is through illegal
19 means, which is to say they are hiding wealth from the
20 government."

21 Q And how are they doing that? Or let me start
22 at that next -- what's the next line that you say there?

23 A "And that makes sense because they keep
24 getting charged with tax evasion."

25 Q Are you referring to Mouna Apperson here?

1 A Yes.

2 Q Okay. So here you're representing that Mouna
3 has been charged with tax evasion multiple times, is
4 that correct?

5 A Yes.

6 Q All right. First off, I can represent, as
7 counsel, Mouna's never been charged with tax evasion.
8 So my question to you is what exactly are you basing
9 that statement off?

10 A CaseNet records.

11 Q Okay. And there's a CaseNet record that has
12 to do with tax evasion is what you're saying?

13 A That is my recollection.

14 Q Okay. What if I told you that there was a tax
15 lien filed and there was no findings and there was a
16 satisfactory judgment filed and it was a civil case?
17 One -- so you saw one? Did you see multiple?

18 A I don't recall.

19 Q But that's -- that's what you said; was that
20 you've seen multiple. What was the purpose of you
21 making this statement?

22 A I don't recall.

23 Q You don't remember why you said that to the
24 person you're talking to here?

25 A I don't.

1 Q I'm going to direct your attention now to
2 Exhibit 3. This is a string of messages between you and
3 Benjamin Singer provided to me by your attorney as part
4 of discovery. We're going to look at Page 1. Here
5 again, multiple lines redacted and before the first
6 visible line from Benjamin Singer, can you read that
7 line starting with, "Well, just let me know"?

8 A "Well, just let me know when something is
9 public and I can help pile on by sharing, going in
10 person, et cetera."

11 (Exhibit 3 identified.)

12 Q Let him know about what?

13 A I don't recall.

14 Q Is it possible that those redacted lines above
15 refer to Mouna?

16 A It's possible.

17 Q And the rest of this page is also -- is
18 redacted, also, correct?

19 A Yes.

20 Q But it's possible you're still discussing the
21 subject of Mouna, correct?

22 A It's possible.

23 Q The remainder of Page 1 is redacted, so please
24 refer now to Page 2. There's only one visible line
25 starting with I'd recommend TREX. Can you read that?

1 A "I'd recommend targeting TREX in a firm but
2 polite way. That will allow people to be like, oh, yeah
3 I agree -- I agree this institution I have some respect
4 for should definitely do the right thing, no brainer. I
5 think that approach will make more people feel
6 comfortable sharing it to help it go viral and
7 ultimately put more pressure on them to kick him out.
8 And/or to create a policy around this kind of thing if
9 they lack one."

10 Q That -- Benjamin's referring to Mouna?

11 A I believe so.

12 Q And, then, all of these follow-up messages are
13 also redacted, so it's probable that you were talking
14 about Mouna or responding to that after that?

15 A It's possible.

16 Q Let's go to the next page, please. All of
17 this page is redacted except for the very last line from
18 Benjamin that reads, "Well, we can hold him accountable
19 publicly." Do you see that?

20 A Yes.

21 Q And you're talking about Mouna, correct?

22 A I believe so, yes.

23 Q Can you explain to me why this is redacted?

24 A I did not redact this document. I cannot
25 explain how it was redacted.

1 Q I'm going to jump you ahead to Page 7. Hold
2 on one second. Okay. My eyesight's going. Can you
3 please read the first line there?

4 A "Nick has threatened to kill me and her."

5 Q Who is the "her" that you're referring to?

6 A Adrian.

7 Q And can you read -- please read the next line?

8 A "One of the rape victims was actually run out
9 of town."

10 Q And you're referring to Adrian, correct?

11 A Yes.

12 Q So your testimony, then, is that your
13 expectation that Adrian will testify that she now
14 resides where she does because she was run of town by
15 Mouna Apperson?

16 A I can't say what Adrian said.

17 Q But your understanding of why she left is
18 because she was run out of town by Mouna Apperson?

19 A Yes.

20 Q Further down on Page 7, you state, "But a lot
21 of women are not willing to speak publicly." Do you see
22 that?

23 A Yes.

24 Q When you say "a lot," how many are you
25 referring to?

1 A I don't recall.

2 Q So you made this statement about a lot of
3 woman and you don't remember any of these women that
4 you're referring to?

5 MS. KELLERMAN: Objection. That wasn't --
6 you're misstating -- your question was how many. You
7 didn't ask names. You didn't ask anything like that.
8 You said how many.

9 Q (By Mr. Kershman) So you don't remember
10 how many women you're referring to?

11 A No, I don't.

12 Q And with the phrase -- when you say "a lot,"
13 do you mean more than one?

14 A Yes.

15 Q Can you identify those that you can remember
16 for me?

17 A There was a woman named Caroline. There's a
18 woman named Annalisha. There was a woman named Mara
19 Cruvant. There was a woman named Lilly -- I can't
20 remember her last name. There was a woman named -- I'm
21 trying to look at the date to make sure I have it in
22 order. There was a woman named Alyssa. There's a woman
23 named Nicki -- not Nicki, that's her sister. There's a
24 woman named Telia. There's a woman named -- I can't
25 think of any more names right now.

1 Q Do you have this list of women recorded
2 anywhere?

3 A Yes.

4 Q Where?

5 A I handed over all the names to my lawyer.

6 Q How did you keep that list? How did you
7 record it? Sorry.

8 A I kept track of people who would message me or
9 contact me. And, then, when it was time for me to turn
10 that information over to my lawyer, I did so.

11 Q And do you still have the messages from those
12 individuals?

13 A I've deleted my Facebook but you have access
14 to all of it.

15 Q Let's look to Page 8. The first line,
16 Benjamin says, "OK, is there a public letter that women
17 have signed on to?" Do you see that?

18 A Yes.

19 Q Why did you not respond to that question?

20 A I do not recall.

21 Q Also, on Page 8, can you read, starting with
22 "he gets a real kick"?

23 A "He gets a real kick out of trapping, raping,
24 and abusing Jewish women and women of color."

25 Q And here you're referring to Mouna Apperson?

1 A Yes.

2 Q And read the next line, too, please.

3 A "To Jewish and women of color in particular."

4 Q And the next line reads?

5 A "He does this over and over."

6 Q Taking you back to where you stated to

7 Benjamin that Nick has threatened to kill me and her,

8 did you report this threat to the police?

9 A No.

10 Q Do you know whether or not the "her" was

11 Adrian reported this threat to the police?

12 A I do not know.

13 Q Tasha, do you recall filing an order of

14 protection against Mouna Apperson?

15 A Yes.

16 Q I'm going to have you look at Exhibit 4. So

17 you brought your order of protection November 2017, is

18 that correct?

19 A Yes.

20 (Exhibit 4 identified.)

21 Q I'll direct you now to Page 3. The testimony

22 you provided in this hearing before the court was made

23 under oath, is that correct?

24 A Yes.

25 Q I'm going to now direct your attention to Page

1 35, starting at Line 22. I guess I'll wait for a moment
2 to get there. Starting at Line 22, under
3 cross-examination by Mouna's counsel, she asked, "Okay,
4 and at no point in time did he ever make threats to
5 you?" To which your response was "Correct." Do you see
6 that?

7 A Yes.

8 MS. KELLERMAN: Object as far as if you want
9 to go back, she's specifically talking about a time
10 period. If you go back to Line 10, the questions are
11 between May and September.

12 MR. KERSHMAN: This is my deposition. You can
13 always come back around, if you'd like.

14 Q (By Mr. Kershman) I'm going to now direct
15 your attention to Page 41 of the transcript,
16 beginning on Line 13. Mouna's counsel is referring
17 to the order of protection you filed and on Line 16
18 she states, "Nowhere do you check that he ever
19 sexually assaulted you, correct?" To which you
20 replied, "Correct," right? And, here again, this is
21 referring to Mouna, correct? Is that correct?

22 A Yes.

23 Q Then on Line 19, Mouna's counsel states, "All
24 right. "And nowhere in here do you claim that he
25 actually assaulted you at any point in time, correct?"

1 To which you answered, "Correct." Is that what that
2 says; the transcript?

3 A Yes.

4 Q Next, on Page 42, starting Line 7, Mouna's
5 counsel states, "After the respondent" -- referring to
6 Mouna -- "was made aware of your public announcement, he
7 never contacted you, correct?" To which you responded,
8 "Correct." Do you see that there?

9 A Yes.

10 Q Then Mouna's attorney states, "Never made any
11 threats to you, correct?" To which you answered,
12 "Correct." Do you see that?

13 A Yes.

14 Q Then Mouna's attorney states -- sorry, what
15 was my last question? All right. Mouna's attorney goes
16 on to state, "Never made any threats about you to your
17 friends" to which you answered "Not that I'm aware of,"
18 do you see that there?

19 A Yes.

20 Q And your petition for order of protection
21 against Mouna was denied, is that correct?

22 A Yes.

23 Q Direct your attention now to Page 100 of
24 Exhibit 4, this same exhibit. This is an e-mail from
25 you to Patricia Hagen? One moment. I apologize. I'm

1 sorry. I'll have to come back to that. My bad, I
2 apologize. Do you recall sending an e-mail to Patricia
3 Hagen?

4 A Yes.

5 Q Who is Patricia Hagen?

6 A I believe she's in charge of TREX.

7 Q Do you recall sending her a letter in November
8 of 2018?

9 A No. I don't recall but I believe it's
10 possible.

11 Q Do you recall sending her a letter where you
12 told her that you were raped and abused by Nick Apperson
13 that's renting space -- office space at her
14 organization?

15 A Yes.

16 Q Do you recall saying that since he raped you
17 he has harassed you and raped at least one other woman?

18 A Yes.

19 Q And from the time you testified at the hearing
20 on your order of protection against Mouna to today, has
21 Mouna raped you?

22 A No.

23 Q Since that time, have you observed Mouna rape
24 at least one other woman?

25 A Personally observed?

1 Q Correct.

2 A No.

3 Q Since that time, did Mouna harass you?

4 A Through the court system.

5 Q Did Mouna harass you directly?

6 A Directly through the court system.

7 Q Has he threatened to kill you?

8 A Since when?

9 Q Since the order of protection.

10 A No.

11 Q If I'm representing to you that this was
12 November of 2018, this letter I'm referring to, why
13 would you state this all to her when you already
14 testified under oath that that is not true?

15 A I don't understand your question.

16 Q Well, I don't have this letter in front of you
17 right now. If I'm going to represent to you that that
18 letter is there, and it's from 2018, after the order of
19 protection, why did you state that to Patricia Hagen
20 when you already testified under oath that that is not
21 correct?

22 MS. KELLERMAN: Object as to misstates the
23 previous testimony. As I previously stated, the
24 testimony you pick and choose for the order of
25 protection did not include the time periods the

1 testimony was applicable to.

2 MR. KERSHMAN: That was the first question.

3 The second one was at any point in time, but it --

4 you're free to come back around with that.

5 MS. KELLERMAN: At any point in time what?

6 MR. KERSHMAN: You're free to do this. I

7 don't care for you testifying for her.

8 A I'm sorry, what's the question?

9 Q (By Mr. Kershman) We'll move on. We're
10 going to go to Exhibit 6, Page 8 through 9. Let's
11 start with 9. Do you see, about the middle, 6:31,
12 where you say "They are a serial rapist and abuser
13 and often use identity politics to evade
14 accountability"?

15 A Yes.

16 (Exhibit 6 identified.)

17 Q And this you're talking to Koach --

18 A Koach Baruch Frazier.

19 Q And do you see you had to get a restraining
20 order against them because they have stalked and
21 intimidated you for four years?

22 A Yes.

23 Q And your order of protection was denied,
24 correct?

25 A Yes.

1 Q All right. Do you see where it says the "One
2 big thing that would be supported is speaking up that
3 they would be held accountable by the trans community
4 because they are known to dismiss these claims by saying
5 they can't rape or abuse because they are non-binary"?
6 Do you see that?

7 A Yes, I see that.

8 Q And you said that?

9 A Yes.

10 Q How is it that you believe Mouna Apperson
11 dismisses these claims by saying they cannot rape or
12 abuse because they are non-binary?

13 A I don't understand the question.

14 Q How is it that you -- where is the foundation
15 for your belief of that statement that you made?

16 A My knowledge of the person that they are.

17 Q So you have no evidence that they've used --
18 that they've done anything in that claim you've just
19 made?

20 A Not that I can recall.

21 Q Are you saying that non -- are you saying that
22 non-binary individuals cannot rape or abuse people?

23 A No.

24 Q Are you claiming that Mouna Apperson feels
25 this way?

1 A I don't know what they feel.

2 Q Go to Exhibit 32, please. And this is a
3 string of messages between yourself and Veronica
4 Darlene, is that correct?

5 A Yes.

6 (Exhibit 32 identified.)

7 Q Let's take a look at Page 7, right at the --
8 pretty much at the top there. You're saying I think it
9 is important" -- from there -- in there, and you can
10 read it all out loud, if you want, or take your time to
11 read it. Do you see where it says "Nick has habitually
12 tortured my friends with frivolous lawsuits trying to
13 get me to shut up"?

14 A Yes.

15 Q What evidence do you have that Mouna has
16 habitually tortured you and your friends with frivolous
17 lawsuits?

18 A I'm currently in a frivolous lawsuit.

19 Q How do you define frivolous?

20 A Unnecessary.

21 Q And that's what -- but that's not what you
22 said. You used the term frivolous.

23 A Yes.

24 Q Multiple ones is what you said. Your friends,
25 too, other friends?

1 A Yes.

2 Q Who?

3 A I know that they tried to sue basically
4 everyone who was in Radix.

5 Q And you have evidence to this effect?

6 A It's in CaseNet.

7 Q All right. And those -- those you all claim
8 these are frivolous, these lawsuits that you claim are
9 out there torturing people to get you to shut up?

10 A Yeah. Yes, sir.

11 Q I'm just going to talk generally about some
12 other accusations that you've made against Mouna. Have
13 you ever accused them of being physically abusive to
14 you?

15 A No.

16 Q Have you ever accused them of being verbally
17 abusive toward you?

18 A Yes.

19 Q How were they verbally abusive toward you?

20 A Apperson, with a degree of regularity, would
21 instigate fights with me that would ratchet up to the
22 point where I was frightened for my safety.

23 Q Was this during the relationship that you had
24 with them?

25 A Yes.

1 Q Did you break up with them based on this --
2 these verbal abuse that you're claiming?

3 A Eventually, yes.

4 Q Why not sooner?

5 A I believed I was in love with Apperson and
6 that we would make it work.

7 Q So, when exactly did they verbally abuse you?
8 What time frame?

9 A Starting in the fall of 2012 all the way
10 through August 2014 -- or 2013, excuse me.

11 Q And where did this verbal abuse take place?

12 A In various locations, including restaurants,
13 bar houses, and public.

14 Q Can you give me an example of one of these
15 incidents?

16 A They -- an example would be they told me that
17 their mother feared that they would marry me and that I
18 would be controlling because Jewish women are
19 controlling. When I told them that that was an
20 antisemitic trope they became very, very angry and made
21 themselves frightening to me.

22 Q And how so? In what manner?

23 A Raising their voice, showing off their size.

24 Q And what did they say in response to that?

25 A I don't understand the question.

1 Q When you said that to them and they appeared
2 angry, did Mouna have a verbal response to you when they
3 were angry and raising their voice?

4 A That I had to apologize.

5 Q Why would Mouna ask you to apologize?

6 MS. KELLERMAN: Objection. Calls for
7 speculation. You can answer if you know.

8 Q (By Mr. Kershman) Was Mouna saying this is
9 their personal belief?

10 A They were saying that this was their mother's
11 belief; but what mattered is how they reacted to me.

12 Q I'm going to show you -- go back to Exhibit 1.
13 It's entitled "Organize & Handle It," do you recognize
14 that?

15 A No.

16 (Exhibit 1 identified.)

17 Q Are these messages between you and other
18 individuals?

19 A I don't know.

20 Q All right. This document's provided to us in
21 response to discovery requests. So, you're unfamiliar
22 with this group; "Organize & Handle It"?

23 A I don't recall it.

24 Q You don't remember participating in this at
25 any time? So we can -- I'm just repeating. Let's go

1 down a little bit. You can see some responses from you.
2 Take your time and read it. Does that refresh your
3 recollection?

4 A That does not refresh my recollection.

5 Q From what you're reading, are you discussing
6 Mouna Apperson in this?

7 A Yes.

8 Q Do you remember at all what might be discussed
9 in redacted areas?

10 A No.

11 Q Is it possible that those discussions involve
12 Mouna Apperson?

13 A It's possible.

14 Q Do you recall, if not this particular set of
15 messages, do you recall reaching out to the members of
16 the group?

17 A I do not recall but I realize that it
18 happened.

19 Q Do you remember what your goals were in
20 reaching out to these individuals about Mouna Apperson?

21 A To protect other people.

22 Q Did you contact the police when that allegedly
23 occurred?

24 A I don't understand the question.

25 Q You're describing in here that Mouna -- that

1 what you believe is Mouna Apperson raped you during your
2 relationship. So when did that occur?

3 A Multiple times.

4 Q When did the first incident occur?

5 A April 2013.

6 Q And when you -- you were in a relationship at
7 that time?

8 A Yes.

9 Q Describe what happened.

10 A We were having sex for the first time.
11 Apperson asked me to strip down naked. I asked to keep
12 on my bra. Apperson said that I must take off my bra.
13 I complied. We initiated sex. I had an allergic to the
14 condom and was in so much pain that I begged to stop. I
15 went into the bathroom and cleaned myself off. Apperson
16 came into the bathroom and said once I was washed up we
17 should continue. I said that I thought I was having an
18 allergic reaction to the condom. Apperson said that it
19 would be okay. We went back to having sex even though I
20 continued to say that I was in pain and I thought we
21 should stop. Apperson replied by saying that we should
22 simply change positions. And that continued until
23 Apperson finished.

24 Q Did Apperson prevent you from leaving the
25 room?

1 A No.

2 Q Did you consent to the intercourse in the
3 first place?

4 A Initially, yes.

5 Q Did they exert any force in this -- the
6 intercourse that you participated in?

7 A There was no physical force exerted.

8 Q Did you ever contact the police when that
9 allegedly occurred?

10 A No.

11 Q Did you go to the hospital?

12 A No.

13 Q Did you ask for help?

14 A I don't understand the question.

15 Q Did you ask anybody for help right after this
16 occurred?

17 A I spoke to my friend to ask if it was normal
18 and they said they weren't sure.

19 Q Did you ask for any help after that?

20 A No.

21 Q Do you have any physical evidence that Mouna
22 Apperson raped you?

23 A No.

24 Q I know you claimed this happened frequently
25 but you remained in this relationship with Mouna

1 Apperson, right?

2 A Yes.

3 Q When is the next -- well, let me back up. How
4 many times did you and Mouna Apperson have penetrative
5 intercourse?

6 A I did not keep count.

7 Q So, you are saying it's more than once?

8 A Yes.

9 Q So, tell me about the next time that you claim
10 Mouna raped you.

11 A Apperson was telling me that they had access
12 to extremely secret knowledge that put us both in danger
13 and that something could happen to us, or me, and that
14 it would look like an accident. And I was frightened
15 and I cried.

16 Q Do you recall exactly when this was?

17 A It was sometime in the spring of 2013.

18 Q And they're telling you this before you had
19 sex --

20 A Yes.

21 Q -- to make you have sex?

22 A I don't know.

23 Q How -- then, continue explaining to me how
24 this was Mouna raping you.

25 A I felt too afraid to say no, given the

1 information they had just said that really truly
2 frightened me. I thought that there was something going
3 on mental health wise with Apperson and I did not feel
4 that I could safely exit the room.

5 Q Did you continue your relationship with them?

6 A Yes.

7 Q Did you have penetrative sex with them after
8 that?

9 A Yes.

10 Q And you claim -- are you claiming that there
11 is a subsequent time that you were raped by them?

12 A Yes.

13 Q Can you tell me when that was?

14 A In the spring of 2013.

15 Q Describe for me, please, that incident.

16 A Apperson was at my apartment. They told me
17 that they were unhappy with our sex life, that we were
18 not having enough sex, and if we didn't have more sex
19 soon, they would find sex somewhere else. They began to
20 initiate sex with me and I said I did not want to have
21 sex. They blocked the door of my bedroom with their
22 body and said they wanted to have sex and I felt, for my
23 personal safety, that I had to comply with having sex
24 and so we did.

25 Q Did you break up with Mouna after this

1 incident?

2 A No.

3 Q Did you report it to the police?

4 A No.

5 Q Did you talk to anybody about it --

6 A No.

7 Q -- immediately afterwards?

8 A No.

9 Q What age were you at this time?

10 A 23, I think.

11 Q Had you previously had penetrative sex with
12 any other individuals?

13 A No.

14 Q Did you experience any type of sexual assault
15 or trauma prior to that time?

16 A I was sexually assaulted as a child.

17 Q Had you undergone therapy for that?

18 A No.

19 Q Have you undergone any type of therapy since?

20 A Yes.

21 Q When did you start undergoing therapy?

22 A 2015.

23 Q Are you still seeing a therapist today?

24 A Yes.

25 Q What therapist are you seeing today?

1 A Teresa Strong.

2 Q How long have you been seeing her?

3 A Since June of this year.

4 Q Who have you seen before that?

5 MS. KELLERMAN: Just for purposes of this
6 deposition, object as to patient/counselor or
7 physician privilege. If you're limiting it to your
8 most recent discovery request, which limited it to a
9 claim of PTSD, I am fine for purposes of this lawsuit
10 with her discussing that. Are you limiting it to
11 that? Or are you asking for her entire mental health
12 history? Because I think that's inappropriate. And
13 I would object and direct her not to answer. I'm
14 happy with her answering if you're going to limit it
15 like your discovery request. I'm not trying to be on
16 obstructionist. I'm just trying -- she does not have
17 an affirmative claim in this lawsuit, has not waived
18 privilege, and I understand is limited in your
19 discovery request based on one count, and we can
20 comply with that, but I just need to be clear so that
21 there's no confusion later.

22 MR. BUTTERFIELD: I'll join.

23 MR. KERSHMAN: Fair enough, so then --

24 MS. KELLERMAN: Do you want to limit it or are
25 you --

1 MR. KERSHMAN: At least for now, yes.

2 MS. KELLERMAN: Okay. So the question -- just
3 for the record, the question is limited to therapy
4 related to the PTSD claim alleged in the dismissed
5 civil lawsuit? Is that how --

6 MR. KERSHMAN: Yes.

7 MS. KELLERMAN: Is that -- okay. Thank you.
8 So your answers are related to that.

9 Q (By Mr. Kershman) So, who did you see
10 before the most recent therapist?

11 A I saw a counselor on BetterHelp. I'm blanking
12 on her name right now.

13 Q From BetterHelp? That's a clinic?

14 A BetterHelp's an online service for matching
15 people to therapists.

16 Q So did you meet with this person like
17 telehealth?

18 A Yes.

19 Q They're located in Missouri?

20 A They're in Georgia.

21 Q They're in Georgia. And how long did you
22 treat with that individual?

23 A Approximately two-thirds of a year.

24 Q Anyone before that related to the PTSD?

25 A Yes.

1 Q And who is that?

2 A Valerie Brink.

3 Q And when did you see Valerie Brink?

4 A In 20 -- 2019.

5 Q How long did you see them?

6 A I saw her approximately a year.

7 Q Anyone prior to that?

8 A Pardon?

9 Q Excuse me, anyone prior to that?

10 A Yes.

11 Q Who's that?

12 A Amy Matthews.

13 Q And when did you see Amy Matthews?

14 A 2018 through 2019.

15 Q Anybody prior to that?

16 A Yes.

17 Q And who was that?

18 A Barb Hubbell.

19 Q And how long did you see Barb Hubbell?

20 A Approximately half a year.

21 Q And did you see anybody before that?

22 A I saw Dr. Steven Stromsdorfer.

23 Q Doctor of psychology or psychiatrist?

24 A Psychiatrist.

25 Q Okay. How long did you see that doctor?

1 A I've been seeing him for over six years.

2 Q Okay. And he's provided treatment in
3 conjunction with the therapy that you've been
4 undergoing?

5 A Yes.

6 Q Is there any particular reason why your
7 relationships with the therapists didn't last
8 particularly long?

9 A I traveled a lot for my job.

10 Q Currently you don't travel, correct?

11 A Currently, I do not travel.

12 MR. KERSHMAN: All right. Let's take a quick
13 break.

14 THE VIDEOGRAPHER: We are going off the record
15 at 11 a.m.

16 (Break taken.)

17 THE VIDEOGRAPHER: We are back on the record
18 at 11:06 a.m.

19 Q (By Mr. Kershman) I'm going to show you
20 what has been marked as Exhibit 2. You've used
21 Facebook in the past, correct?

22 A Yes.

23 (Exhibit 2 identified.)

24 Q When did you discontinue Facebook?

25 A When I was sued.

1 Q This particular suit?

2 A Yes.

3 Q Do you or have you used the name Tasha Melisa
4 on Facebook?

5 A Yes.

6 Q Does Exhibit 2 appear to be a screenshot of a
7 post or comment that you made on Facebook?

8 A Yeah, but I have a question -- I'm not allowed
9 to ask. Yes, that's --

10 Q Did you make the following comment: "I will
11 clarify: I classify what happened to me to be sexual
12 coercion. Some people consider that rape, some don't.
13 Nick told a table full of people that they raped me.
14 They used the word rape. I didn't."

15 A Yes.

16 Q I'm going to ask you to clarify something for
17 me. We're going to show you what's marked as Exhibit 5.
18 These are messages that were provided to us during
19 discovery with Chris -- Chris Luft, who is that?

20 A I don't know.

21 (Exhibit 5 identified.)

22 Q Do you see where it reads -- Page 3, I'm
23 sorry. Do you see where it says, "Chris, I'm so sorry
24 that happened to you and your partner." Do you see
25 that, starting in there?

1 A Yes.

2 Q Do you see where it says, "You are on -- you
3 are one on a list that's nearing 30 people that have
4 come forward with accusations ranging from rape to
5 harassment to stalking"? Do you see that?

6 A Yes.

7 Q Are you referring to Mouna Apperson here?

8 A Yes.

9 Q Can you explain what you mean by "a list
10 nearing 30 people"?

11 A I mean that nearly 30 people contacted me with
12 their own stories of abuse concerning Nick Apperson --
13 or concerning Mouna Apperson.

14 Q Earlier we talked about a list that you had.
15 Are all of those folks on that list?

16 A No.

17 Q So, this is a separate list that you have
18 somewhere?

19 A This is just what was running -- the running
20 total in my Facebook account.

21 Q So you have somewhere at least 30 people that
22 have come forward that's on your Facebook somewhere?

23 A Approximately is my recollection.

24 Q Do you have any evidence that any of the
25 allegations made by these people are true?

1 A No. I believe them.

2 Q Are you aware Mouna Apperson owns a home
3 located at 3406 Halliday?

4 A Presently?

5 Q Halliday.

6 MS. KELLERMAN: Presently? You said owns.

7 Q (By Mr. Kershman) Owned, at a time.

8 A Yes.

9 Q When did you become aware that Mouna Apperson
10 owned that home?

11 A In the spring of 2015.

12 Q How did you find out Mouna Apperson owned the
13 home?

14 A I saw a posting on Facebook for someone
15 looking for roommates. And then I realized that it was
16 their house.

17 Q Are you aware of an event called FoodSpark?

18 A Yes.

19 Q When did you first learn about that event?

20 A My friend, Rachel, invited me to join her to
21 go to FoodSpark. I don't recall the date.

22 Q So, you don't know whether that was after you
23 knew that Apperson owned property located at 3406
24 Halliday?

25 A I don't recall.

1 Q Did you ever research these FoodSpark events
2 on Line?

3 A Yeah, I was interested in the organization.

4 Q And you attended one of their events?

5 A I attended one event.

6 Q One event?

7 A One event, yes.

8 Q When -- when was that event that you attended?

9 A I believe it was in the summer of 2016.

10 Q Did you look into prior events?

11 A Yes.

12 Q Do you recall running into Mouna Apperson at
13 the event you went to?

14 A Yes.

15 Q Did you know that Mouna Apperson lived at that
16 time -- where Mouna Apperson lived at that time when you
17 ran into them at this event?

18 A Yes.

19 Q Let's go to Exhibit 7. There's a lot of
20 redaction. Let's go to Page 82. Do you see the last
21 word on Page 82? Do you see where it reads --

22 A My.

23 Q It starts with "my" and then we'll go into the
24 second page there.

25 A Yes.

1 Q "Rapist/stalker has said plenty of antisemitic
2 and sexual things to me and at least six other Jewish
3 women leaving you to think that he gets a special kick
4 out of hurting Jewish girls."

5 A Yes.

6 Q Were you talking about that in the redacted
7 sections above?

8 A I don't recall.

9 Q Is it possible you were?

10 A It's possible.

11 Q And in the redacted sections below possibly
12 you were talking about it?

13 A It's possible.

14 Q What is it that Mouna Apperson has done that
15 leads you to believe that Mouna is antisemitic?

16 A Mouna accused all Israelis of being genocidal.
17 Mouna told me they were embarrassed that I kept kosher.
18 Mouna confronted a Jewish woman at a party and told her
19 that she had Jewish privilege and that she -- the
20 religion of Judaism was a religion of fear. Mouna went
21 on a date with another Jewish woman and admitted to
22 participating in a smear campaign against a rabbi.

23 Q Who was that Jewish woman you're referring to?

24 A I don't understand the question.

25 Q What the name of this other Jewish woman that

1 you are now referring to?

2 A Alyssa Banford.

3 Q How do you know her?

4 A Alyssa Banford and I volunteered together and
5 have been friendly from going to services together.

6 Q Is there any evidence in writing from Mouna
7 Apperson demonstrating they are antisemitic?

8 A I do not know.

9 Q Are you aware that Mouna Apperson's family are
10 Jewish?

11 A Yes, I am.

12 Q Were you aware of that information at the time
13 you made these claims against Mouna Apperson?

14 A Yes.

15 Q So it's your contention that Mouna Apperson is
16 antisemitic, despite the fact that they themselves have
17 Jewish family members?

18 A Yes.

19 Q Let's look at Exhibit 4, Page 9. So you and
20 Mouna Apperson used to live close to one another,
21 correct?

22 A Yes.

23 Q And at one point you lived within about two
24 blocks of one another, is that correct?

25 A Yes.

1 Q And do you recall expressing concern about the
2 fact that Mouna Apperson lived so close to you?

3 A Yes.

4 Q So, looking back at Exhibit 4, at the
5 transcript of that order of protection you filed. Do
6 you recall testifying, during your order of protection
7 hearing, that you were scared Mouna Apperson lived close
8 to you?

9 A Yes.

10 Q And that you tried to break your lease?

11 A Yes.

12 Q And once you were able to move, did you choose
13 to move far away?

14 A Yes.

15 Q Did you choose to live in a place that's six
16 blocks from Mouna Apperson?

17 A No.

18 Q Where did you -- how far away did you move
19 then?

20 A I moved out to Soulard.

21 Q And this was at the time that you learned
22 about living close to Mouna?

23 A I moved in September of 2015, as soon as I
24 could feasibly fiscally break my lease.

25 Q So you ultimately were able to break your

1 lease. Who was the lease with?

2 A I can't remember her name.

3 Q Let me ask you some questions about Cori Bush.
4 Have you spoken with Cori Bush regarding Mouna Apperson?

5 A Yes.

6 Q Can you describe the conversation you had with
7 Cori Bush about Mouna Apperson?

8 A I spoke to Cori Bush on the phone.

9 Q Sorry. Cori Bush. Did I say Cori Apperson --
10 no, Cori Bush about Mouna Apperson, okay.

11 A I'm confused.

12 Q Sorry. I was talking to your attorney. I'll
13 re -- I'll restate that whole question. I was asking
14 you to describe the conversation you had with Cori Bush
15 about Mouna Apperson.

16 A I contacted Cori Bush to let her know that she
17 was keeping the company of somebody who is a rapist -- a
18 rapist and an abuser. She was initially defensive but
19 then became supportive. I spoke to her on the phone as
20 well. I listened to her own survival story. And we
21 ended things amenably.

22 Q When -- when was it that you contacted --

23 A I do not recall.

24 Q Why did you feel it was necessary to have that
25 conversation with Cori Bush?

1 A Adrian had indicated to me that she had tried
2 to warn Cori Bush previously. And I had consulted on
3 Cori Bush's campaign, so I figured I would be a good
4 person to contact.

5 Q Were you consulting on her campaign at that
6 time?

7 A No.

8 Q When you were consulting on the campaign, was
9 it common for individuals to reach out to warn Cori Bush
10 about individuals she's associated with?

11 A I do not know.

12 Q Did Cori Bush describe Mouna Apperson's
13 donations to her campaign as reparations?

14 A Yes.

15 Q Can you explain that? What was the context of
16 that?

17 A I asked Cori if she would please donate the
18 money that Apperson had given to her campaign.
19 Congresswoman Bush said that that money was reparations.

20 Q And this was something she said to you
21 directly?

22 A Yes.

23 Q Was anybody else present?

24 A Yes.

25 Q Who?

1 A Brittany Newton.

2 Q How do you know Brittany Newton?

3 A Brittany Newton is Blithe De Carona. They
4 lived at Radix House.

5 Q Who else was present?

6 A Nobody.

7 Q Do you recall now when that took place?

8 A No.

9 Q Did you have -- did you understand at the time
10 what reparations was for?

11 A No.

12 Q Did you publicly accuse Cori Bush of taking a
13 bribe from Mouna Apperson?

14 A I do not recall.

15 Q And when you say you do not recall, you don't
16 remember?

17 A I don't remember.

18 Q So it's possible that you did say that?

19 A It's possible.

20 Q Did you public accuse Cori Bush of selling
21 women to Mouna Apperson?

22 A I do not recall.

23 Q You do not remember if you said that, so it's
24 possible you said that?

25 A It's possible.

1 Q You think that Cori Bush and other political
2 figures should not accept campaign contributions from
3 Mouna Apperson?

4 A Yes.

5 Q Why?

6 A Because money is a way of exchanging power.

7 Q Is it your testimony that by Mouna Apperson,
8 making donations to politicians, is ultimately abusing
9 for the abuse of power by the politician?

10 A I don't understand the question.

11 Q The politician -- are you familiar -- well,
12 strike that. If a politician supports a platform that
13 you support, you still believe they should not receive a
14 contribution from Mouna Apperson?

15 A Yes.

16 Q And why is that?

17 A Because it gives Mouna Apperson access to
18 people who are vulnerable.

19 Q I don't understand that at all. Can you
20 explain?

21 A Which part should I explain?

22 Q Everything. I really don't understand
23 anything you said.

24 A When people exchange money for political
25 purposes, especially large amounts of money, it gives

1 them access to political figures and it gives them
2 access to communities frequently that are vulnerable and
3 that's my explanation.

4 Q What's a lot of money?

5 A I don't understand the question.

6 Q What's lot of money to you that would rise to
7 the level in a contribution to where you believe
8 somebody would have this access to the politician?

9 A Probably the maximum donation amount.

10 Q And what would that be?

11 A I don't recall off the top of my head what the
12 maximum donation amount is legally.

13 Q Can you take your best guess at it? We won't
14 hold you to it.

15 A I believe the total amount allowed per
16 election -- per -- I know that it works -- you have
17 primary and then you can give again after primary, I
18 believe. And I believe the first minimum is something
19 like 1,250, but I don't know for sure.

20 Q So you believe a campaign contribution of
21 roughly \$1,000 --

22 A Yes.

23 Q -- by anyone gives them the unique access to a
24 politician and to policy?

25 A Especially with local politicians, yes.

1 Q Can you describe how?

2 A Stewardship.

3 Q Can you explain that to me?

4 A Fundraising is based on the concept of
5 cultivation and stewardship. You want people to keep
6 giving you money. You see them, you listen to them, you
7 treat them well.

8 Q Does that mean that -- you're referring to a
9 politician that would do that?

10 A Yes.

11 Q Does that mean, then, that that politician is
12 going to provide access to the person donating to
13 their -- their own political agenda and political
14 policy?

15 A Potentially, yes.

16 Q So, there would be more than Mouna Apperson
17 that you would believe should not be allowed to donate
18 or contribute to a campaign? Is that fair to say?

19 A I'm not familiar with who else is donating or
20 what they've done.

21 Q Is it fair to say that there's at least more
22 people, at least one more person, that you might find --
23 that you personally might find as objectionable as Mouna
24 that are contributing?

25 A It's possible.

1 Q In your experience working with politicians,
2 was this something that you all performed any kind of
3 due diligence on before accepting contributions from
4 them?

5 A I don't understand the question.

6 Q Did you investigate the character of
7 individuals that make maximum donations?

8 A No.

9 Q Why not?

10 A Because I did not recognize their names.

11 MS. KELLERMAN: Can I just ask for
12 clarification? Are you talking about when she worked
13 on campaigns or just as a private --

14 MR. KERSHMAN: Yes. Yeah, her experience.

15 MS. KELLERMAN: But in a campaign setting, not
16 just on her own?

17 THE WITNESS: Oh, I didn't understand the
18 question.

19 Q (By Mr. Kershman) I mean, I was referring
20 to your experience working on campaigns, if you were
21 involved or aware of that process.

22 A No.

23 Q Were you involved at all in making
24 recommendations on ways in which a politician could be
25 proactive in investigating those contributions, the

1 donors themselves?

2 A Professionally, no.

3 Q And you may have testified to this before, you
4 did not have any experience with other folks such as
5 yourself that would make the type of reports that you
6 make?

7 A What type of reports?

8 Q The reason you contacted Cori Bush in the
9 first place.

10 A Can you repeat the question?

11 Q In your experience working there -- and I
12 believe I asked this before, so tell me if I got this
13 wrong -- that you did not have any experience with
14 anyone else making reports about campaign contributions
15 similar to a type of report that you made?

16 A No, I want to clarify that I simply consulted
17 on fundraising in an earlier election of Bush.

18 Q In that experience of consulting on
19 fundraising -- and that is a principal part of your
20 occupation, fundraising?

21 A Yes.

22 Q Did you have any experience with any other
23 individuals making claims about inappropriate conduct by
24 individual donors?

25 A No.

1 Q Have you made any -- let me strike that. In
2 your personal capacity, have you made any public
3 statements that do not necessarily talk about any
4 individual, however, discuss the issue of campaign
5 contributions from inappropriate individuals?

6 A I do not recall.

7 Q What is the source of information from which
8 you base your own opinion on why politicians should not
9 accept campaign contributions from individuals such as
10 Mouna Apperson?

11 A My reasoning was to protect other people from
12 being subjected to what I was subjected to.

13 Q Did you make any public statements expressing
14 your opinion about politicians should not accept
15 campaign contributions from inappropriate individuals?

16 A I do not recall.

17 Q It's possible you did but you don't remember?

18 A Yes.

19 Q But it's -- is it an issue that you feel
20 strongly about?

21 A Locally, yes.

22 Q You have not been involved in any type of
23 scholarly work involved in that conviction of yours?

24 A No.

25 Q Have you made any professional presentations

1 on campaign contributions at a local level?

2 A No.

3 Q Do you know any individuals that share your
4 opinion that have written anything or published anything
5 on the subject?

6 A No.

7 Q I'm going to show you Exhibit 8. I'm going to
8 look at Page 21. This is -- this was provided to us in
9 disclosure. Page 21. Do you see where it says "She
10 absolutely knew about Nick being an abuser and that
11 there were multiple allegations"? You're referring
12 about -- you're referring to Cori Bush?

13 A I do not recall for certain.

14 (Exhibit 8 identified.)

15 Q Who else could these statements be about?

16 A I do not know.

17 Q Whoever it is that you're referring to, are
18 you implying that what they -- what that person did --
19 let me strike that. Did you ever claim that you were
20 afraid of Cori Bush?

21 A No.

22 Q Have you ever claimed that any organizations
23 were bribed to ignore Mouna Apperson's alleged conduct?

24 A Yes.

25 Q Who all or which -- what organizations are you

1 claiming were bribed to ignore Mouna's alleged conduct?

2 A I do not recall the list of organizations off
3 the top of my head. The ones I do recall include Sex
4 Positive STL, FoodSpark.

5 THE STENOGRAPHER: I'm sorry, what was that
6 again?

7 THE WITNESS: FoodSpark. Wendy Hopp. That's
8 all I can recall right now.

9 Q (By Mr. Kershman) Is it your testimony
10 that you believe those organizations are corrupt?

11 A No.

12 Q Do you believe it would be inappropriate to
13 accept a bribe to ignore any alleged inappropriate
14 conduct?

15 A Yes.

16 Q But you believe that these organizations did,
17 in fact, accept bribes from Mouna Apperson to ignore
18 their alleged conduct?

19 A I believe that these organizations received
20 money that made these organizations less likely to be
21 critical of Apperson's behavior.

22 Q How do you know that? Let me ask you a
23 different question. Is that your personal opinion?

24 A Yes.

25 Q So your personal opinion is that if Mouna

1 Apperson donated to an organization, it was for the
2 purpose of bribing them to which that organization
3 accepted the bribe and ignored inappropriate conduct, is
4 that your opinion?

5 A It is my opinion that when a non-profit
6 receives a gift they are beholden to the person they
7 receive the gift from.

8 Q Any denomination?

9 A Any denomination --

10 Q Any financial -- any amount of financial
11 denomination or is it a specific amount?

12 A A larger amount.

13 Q What do you consider to be a large amount?

14 A It depends on the organization that
15 constitutes a large amount.

16 Q Let's pick a couple organizations that you
17 believe Mouna Apperson bribed.

18 A I imagine that over 250 is a lot of money to
19 Sex Positive STL.

20 Q \$250?

21 A Dollars, yeah.

22 Q And that organization, by accepting \$250, is
23 beholden to Mouna Apperson? That's your belief?

24 A Yes.

25 Q Do you have any direct experience working in

1 an organization that this was part of their policy?

2 A To be beholden to their donors?

3 Q Um-hmm.

4 A It's best practice for non-profit
5 organizations to treat their donors extremely well,
6 cultivate them and steward them.

7 Q And extremely well means essentially be party
8 to criminal conduct is what your opinion is, is that
9 correct?

10 A I do not think that these organizations were
11 party to any -- to criminal conduct. However, I do
12 think they unintentionally -- unintentionally
13 facilitated it.

14 Q So, is it fair to say you have no direct
15 evidence that Mouna, with intention, bribed these
16 organizations?

17 A Yes.

18 Q And your opinion would apply to any non-profit
19 organization?

20 A I don't understand the question.

21 Q That any -- any non-profit organization would
22 be beholden to any contributor to them, of a
23 relevant-sized contribution, to inadvertently be party
24 to covering up some alleged allegation by that
25 individual?

1 A I think that it would make the organization
2 less inclined to follow up on concerns that might be
3 reported.

4 Q This is just your personal opinion, right?

5 A Yes.

6 Q Have you ever made comments claiming that
7 Mouna Apperson takes advantage of members of the LGBTQ
8 community to make money?

9 A I do not recall.

10 Q I'm going to show you Exhibit 10, Page 178.
11 These are messages between you and Sawyer Van Eenoo.
12 Did I get that right; that pronunciation?

13 A I do not know.

14 (Exhibit 10 identified.)

15 Q How do you know this person?

16 A This person also goes by the name of Claire
17 Caplan. I know her from the Jewish community.

18 Q All right. Third from the bottom, it begins,
19 "This may seem so silly and petty right now," do you see
20 that section?

21 A Yes.

22 Q Where your sentence is, "Sally is problematic
23 as heck but Nick literally rapes women and uses people
24 of color and queer folks to make money."

25 A Yes.

1 Q Who's Sally?

2 A I don't recall.

3 Q But you are making statements about this
4 Sally, do you know what those -- those are about?

5 A No.

6 Q So you claim Mouna Apperson uses people of
7 color and queer folks to make money. Which people of
8 color are you referring to here?

9 A The people that they have living in Radix
10 House.

11 Q And which queer folks are you referring to
12 here?

13 A The people they have living in Radix House.

14 Q And how is it that you believe Mouna Apperson
15 is using these people to make money?

16 A They collected money from them.

17 Q Pardon me?

18 A They collected money from them.

19 Q Would you -- would you place Mouna Apperson in
20 the community of queer folks?

21 A I don't know.

22 Q If they were, and I'm collecting money from
23 them as their attorney, would you then say I'm using
24 them to make money?

25 A No.

1 Q What makes Mouna different?

2 A Mouna filled a house with vulnerable people of
3 color and people who are queer. That's different than
4 somebody coming to you for help legally.

5 Q And you believe Mouna filled the house with
6 these folks purely for the intention of making a profit
7 off of them?

8 A Not just for that, no.

9 Q But you do believe that is Mouna's intention;
10 is to use those folks to make money?

11 A I believe they wanted to make money off of it,
12 yes.

13 Q How would they make money off of it by using
14 them?

15 A Using them to pay rent. Using them to start
16 their own non-profits and get paid.

17 Q Is it -- is it your testimony that Mouna's
18 efforts with those folks should be 100 percent
19 profitable -- I'm mean, sorry, 100 percent charitable?

20 A Yes.

21 Q Were these folks all financially struggling?

22 A Yes.

23 Q Did these folks all have no way to contribute
24 to their own rent?

25 A I do not know.

1 Q How do you -- where did you get this
2 information in the first place?

3 A Which information?

4 Q The information about any of the money that
5 he's collecting -- I mean, that Mouna's collecting and
6 for whatever purpose that Mouna is using. Let me strike
7 that all together. Is this your opinion that Mouna uses
8 these folks to make money?

9 A It is not just my opinion, no.

10 Q Who else is involved in the information that
11 you're sharing?

12 A Multiple people from the Radix House told me
13 that this was their experience.

14 Q And that -- I want to clarify. Is that based
15 on your view that Mouna should not have charged anybody
16 anything for absolutely any service, whether it's to
17 rent the house or to help them start a foundation?

18 A I do not know.

19 Q But that's what you believe; is that Mouna
20 should not charge anybody for rent nor should they be
21 compensated for any work that they might do for an
22 organization that's started by any of those folks?

23 A I believe if you want to clear up that you
24 should have a lease document.

25 Q After your relationship with Mouna Apperson

1 ended did you ever attempt to contact them?

2 A I responded to their contacting me.

3 Q Did you ever review their dating profiles?

4 A Personally, no.

5 Q Somebody else had and brought it to your
6 attention?

7 A Yes.

8 Q For what purpose?

9 A I do not know.

10 Q Who was the person that brought it to your
11 attention?

12 A Multiple people brought it to my attention.

13 Q What was your reaction to it?

14 A To be perturbed, but otherwise go about my
15 business.

16 Q They didn't tell you at all why they were
17 doing that?

18 A They said they were worried about other women
19 and other victims.

20 Q Have you ever Googled Mouna Apperson?

21 A Yes.

22 Q Have you attempted to review their social
23 media pages?

24 A No.

25 Q Any other affirmative efforts to find out any

1 type of information about them?

2 A No.

3 Q What were you Googling them for?

4 A Primarily curiosity.

5 Q As -- as an ex-intimate -- somebody that you
6 previously had an intimate relationship with, is that
7 the curiosity?

8 A No, as somebody who's suing me.

9 Q What -- what were you looking for?

10 A I wasn't looking for anything specific.

11 Q Did you have any plans to do anything with the
12 information that you might find?

13 A No.

14 Q Have you ever made any threatening statements
15 to or about Mouna Apperson?

16 A No.

17 Q Have you ever been involved in conversations
18 where someone suggested killing Mouna Apperson?

19 A I do not recall.

20 Q You don't remember whether you did or not?

21 A I do not recall if someone said that to me.
22 If they did, I would not have been okay with it.

23 Q So it's your testimony that you've not been in
24 a conversation which alluded to wanting to kill Mouna
25 Apperson?

1 A I do not recall.

2 Q And, again, I just want to clarify, does "not
3 recall" mean you do not remember, so it's possible?

4 A I do not remember a conversation like this
5 occurring. It is possible.

6 Q I'm going to show you Exhibit 11. This is
7 conversations with Emily Kothe, is that how you
8 pronounce her name?

9 A I do not know.

10 (Exhibit 11 identified.)

11 Q Do you know this -- how do you know this Emily
12 Kate Kothe?

13 A I believe she's associated with STL Sex
14 Positive.

15 Q Did you reach out to her?

16 A Yes.

17 Q Why did you reach out to her?

18 A To notify her about what was going on at
19 STL -- STL Sex Positive.

20 Q Take a look at Page 33.

21 MS. KELLERMAN: Is it 33 or 3?

22 MR. KERSHMAN: It might be 3. It's the wrong
23 exhibit. Sorry, one moment. We're experiencing
24 technical difficulties.

25 MS. KELLERMAN: Could we go off the record?

1 MR. KERSHMAN: Yes.

2 THE VIDEOGRAPHER: We are going off the record
3 at 11:49 a.m.

4 (Break taken.)

5 THE VIDEOGRAPHER: We are back on record at
6 1:05 p.m.

7 Q (By Mr. Kershman) Tasha, I'd like to go
8 back for a minute and clarify something with respect
9 to the individuals that were living at Mouna's house
10 that you said were paying rent. Can you tell me who
11 exactly you claim was paying rent to Mouna?

12 A No.

13 Q You don't know the names of any of those
14 individuals?

15 A No.

16 Q How do you know that they were paying rent?

17 A I was told that they were.

18 Q By who?

19 A By Brittany.

20 Q Was Brittany one of the people?

21 A I don't understand the question.

22 Q Was Brittany one of the people who was
23 renting?

24 A Yes.

25 Q Didn't you just say you didn't know anybody?

1 Maybe I need to -- let me ask the question again. You
2 referred to people living in the house and that all the
3 folks were paying rent. Can you identify any of those
4 people who were paying rent?

5 A Yes. I can identify Brittany.

6 Q Brittany. What's her last name?

7 A Newton.

8 Q When did you talk to Brittany?

9 A Brittany contacted me after I posted on
10 Facebook about Radix House.

11 Q And, to your direct knowledge, she is the only
12 one that you are specifically aware of who was paying
13 rent?

14 A Based on the information that I was given, I
15 was under the impression that people in the house were
16 being charged.

17 Q But you do not know that for sure?

18 A No.

19 Q All right. We're going to move on. You are
20 aware that there is a recording of a conversation
21 between Mouna Apperson and some other people, correct?

22 A Yes.

23 Q When was that recording taken?

24 A I do not know.

25 Q And who made the recording?

1 A I believe Dhoruba Shakur made the recording.

2 Q Who?

3 A I believe Dhoruba Shakur made the recording.

4 Q Thank you. What was the purpose of that
5 conversation?

6 A I do not know.

7 Q Who initiated the conversation?

8 A I do not know.

9 Q Why was there a need to record the
10 conversation?

11 A I do not know.

12 Q When did you become aware that this recording
13 existed?

14 A In October of 2018.

15 Q Who made you aware of the existence of the
16 recording?

17 A Brittany Newton.

18 Q And have you shared this recording with
19 anyone?

20 A Yes.

21 Q Who have you shared the recording with?

22 A My lawyers. And I've played it for my
23 husband.

24 Q Did you share that recording with others?

25 A I have shared parts of it with others.

1 Q Why did you share that recording with others?

2 A To prove I was not lying.

3 Q Do you know if anyone made Mouna Apperson
4 aware that they were being recorded?

5 A I do not know.

6 Q Did you ask anyone to have this conversation
7 with Mouna Apperson on your behalf?

8 A I was approached by Claire Caplan if it would
9 be okay if I was brought up in a conversation regarding
10 the allegations from multiple people. I said I was okay
11 with my name coming up.

12 Q Did you use this recording in any way to
13 support your claims that Mouna Apperson raped you?

14 A In the initial filing I believe my lawyer
15 intended for it to be used to substantiate the claim,
16 yes.

17 Q Your initial filing of what?

18 A I -- initially -- once I came into possession
19 of the tape, I filed for legal redress.

20 Q What -- what did you file?

21 A I do not know the contents of -- I do not
22 recall the contents of what was filed. My lawyer filed
23 it for me.

24 Q What became of that?

25 A It was ultimately dismissed without prejudice.

1 Q Why did you not proceed with it if you believe
2 this recording was helpful to you?

3 A My lawyer -- I asked my lawyer what the
4 likelihood of our success would be, and based on her
5 response and the possibility that I would have to pay
6 Apperson's legal fees, I decided to withdraw the -- the
7 filing.

8 Q Have you made statements to others about the
9 recording that -- Dhoruba, is that how -- I pronounced
10 it wrong. Is that -- how did you pronounce it?

11 A I think it is pronounced Dhoruba. I'm not
12 sure.

13 Q When -- have you made statements to others
14 about the recording Dhoruba made of Mouna Apperson and
15 others having a conversation?

16 A Can you repeat the question?

17 Q Yes. Have you made statements to others about
18 the recording that Dhoruba made of Mouna Apperson and
19 others having a conversation?

20 A Yes.

21 Q And you've made statements claiming that you
22 did not know this recording existed?

23 A Yes.

24 Q Have you ever criticized anyone who was in
25 possession of this recording for not sharing it with

1 you?

2 A Yes.

3 Q I'm going to direct you to Exhibit 12, on Page
4 3. These are messages with Julie Sommer. Who is Julie
5 Sommer?

6 A I do not know.

7 (Exhibit 12 identified.)

8 Q Why are you communicating here with her?

9 A I do not recall.

10 Q So you don't remember?

11 A I do not remember.

12 Q Are we -- we're Page 3. Do you see the bottom
13 there, it says, "My lawyer was not my lawyer over a year
14 ago when the tape was created and I petitioned for an
15 order of protection. I didn't know the recording
16 existed, it was withheld." How was it withheld?

17 A It is my understanding that the recording
18 existed prior to my request for the order of protection.
19 If it had been given over to my lawyer, it's altogether
20 possible that there would have been a different outcome
21 in my order of protection.

22 Q But you used the term withheld, which suggests
23 somebody was aware of it and wouldn't -- wouldn't turn
24 it over on purpose.

25 A Yes.

1 Q How do you know that information?

2 A Because I know -- I have been told when the
3 conversation happened by multiple people. I believed
4 them. And I'm --

5 Q So you're telling me your lawyer asked for
6 this tape and the person then had it withheld it from
7 them?

8 A Yes.

9 Q And the lawyer was not otherwise able to get
10 the recording for you?

11 A They eventually received the recording.

12 Q You knew the people involved in taping, is
13 that correct?

14 A I was familiar with some of them.

15 Q So they all withheld it from you as well?

16 A I do not know if they had a copy or not.

17 Q I'm going to go to Exhibit 14, Page 3.
18 There's a conversation. It is -- it is difficult to
19 read -- to follow. However, it was part of a response
20 to a discovery request. Is that you over there on the
21 side where it says, "When I filed a restraining order I
22 didn't know the recording existed," do you see that?

23 A Yes.

24 (Exhibit 14 identified.)

25 Q Did you file a police report against Mouna

1 Apperson?

2 A Yes.

3 Q Do you have a copy of that police report?

4 A No.

5 Q Did you ever have a copy of the police report?

6 A No.

7 Q Did you ever ask for a copy of that police
8 report?

9 A No.

10 Q Did your attorney or any of your attorney --
11 not necessarily this attorney here -- but previous
12 attorneys request a copy of that police report?

13 A I do not know.

14 Q Is there any reason why you didn't get a copy
15 of the police report?

16 A I didn't know it was an option.

17 Q I'm going to show you what's been marked as
18 Exhibit 15. So, I mean, you've said you've never
19 actually seen this report, right?

20 A No.

21 (Exhibit 15 identified.)

22 Q So I'm going to ask you some questions about
23 the information in there. Does it appear to be a
24 photograph of the first page of the report that you
25 filed with the police?

1 A Is that a question?

2 Q Yes.

3 A I don't know.

4 MS. KELLERMAN: Page 1 doesn't -- I'm just
5 saying -- I'm just saying you're asking if it's a
6 police report.

7 Q (By Mr. Kershman) Do you see roughly in
8 the center of the page where it reads date, time of
9 report, 10/11 of 2018?

10 A Yes.

11 Q Do you recall that as being the date and time
12 that you made a report?

13 A That seems correct, yes.

14 Q Let's look at Page 2. And does that appear to
15 be the second page -- it's hard to read -- was filed by
16 or reported by Chelsea Merta, was that a previous
17 attorney of yours?

18 A Yes, sir.

19 Q Let's go to Page 3. Take your time looking at
20 that.

21 A Okay.

22 Q Does that appear to be a representation of
23 what you told the police when you filed this report?

24 A Yes.

25 Q Right. Is it your testimony that you were

1 unaware that a recording existed until shortly before
2 you filed a police report?

3 A Yes.

4 Q So you're saying you did not know that a
5 recording was ever made until then?

6 A I have been told a rumor that there was one.
7 I did not believe it.

8 Q Let's take a look at Exhibit 9, Page 21. This
9 is back to some messages with Blithe. You see that
10 right there, right about the middle, there it is, that
11 we all knew we were being recorded? It's from Blithe.

12 A Yes.

13 Q Is this the first time you were told about the
14 recording?

15 A I do not recall.

16 Q So you don't remember whether or not that was
17 the first time?

18 A No. Like I said, I heard a rumor that one
19 existed. I did not believe the rumor.

20 Q And here you're discussing Mouna Apperson's
21 subject matter here, correct?

22 A I don't know. It looks like it's about
23 Dhoruba Shakur.

24 Q Is it possible, then, that the previous
25 redacted statements or the following redacted statements

1 contain dialogue that relates to Mouna Apperson?

2 A It is possible.

3 Q Let's take a look at Exhibit 10. These are
4 messages with Sawyer, Page -- sorry, let's go to Page
5 146. You see where it says -- where you said "Did you
6 record it"?

7 A Yes.

8 Q And the response was, "Dhoruba did, like all
9 three hours," that was back in November of 2017?

10 A Yes, that's the rumor that I heard that it had
11 been recorded.

12 Q So that's the rumor?

13 A Yeah.

14 Q Just to make sure I understand you correctly,
15 you told the police, October 11, 2018, that you did not
16 know who took this recording?

17 A My recollection is that I said Dhoruba took
18 it, but I could be remembering incorrectly.

19 Q Go to Exhibit 10, please, Page 140. It's one
20 page -- Page 142.

21 MS. KELLERMAN: 140 what?

22 MR. KERSHMAN: Sorry, 142. I am struggling to
23 read this, though. This is tiny print.

24 Q (By Mr. Kershman) Do you see where it you
25 said right there, second one down, "If they aren't

1 at the house, I'm not sure how they get served.
2 I'll ask my lawyer and also let my lawyer know
3 there's a recording"?

4 A Yeah.

5 Q And then you state, "Can I get this
6 recording"?

7 A Yeah.

8 Q And this is back in November 2017?

9 A Yeah.

10 Q And this is when you still believed it was a
11 rumor?

12 A Yes. I never saw a recording. No one ever
13 gave me a recording. I had no reason to believe that it
14 actually existed.

15 Q Let's take a look, Exhibit 16. And these are
16 messages between you and Vladimer Lapunsky that you
17 turned over in discovery. Who is Vladimer?

18 A I do not know.

19 (Exhibit 16 identified.)

20 Q Why are you having a conversation with them?

21 A I believe they reached out to me or made some
22 kind of contact with me.

23 Q About this video recording?

24 A Just about the situation in general.

25 Q Situation in general. You have a response

1 here on Page 16. It says, "Nothing on the tape
2 incriminates him or even says his name." Who are you
3 referring to?

4 A I do not recall.

5 Q What other tape might you be referring to?

6 A Oh, I see what I'm referring to. I'm talking
7 about Dhoruba Shakur who was holding on to the recording
8 and me trying to understand why he withheld the
9 recording, even though there's nothing on the tape that
10 incriminates him or says his name.

11 Q Incriminates who or says his name?

12 A Dhoruba's.

13 Q Dhoruba? Let's go back to page -- Exhibit 9,
14 sorry, Page 29, again with Blithe. Right there, around
15 10:09, do you see that message?

16 A Yes.

17 Q And that's you telling Blithe that you're
18 going to make a post basically saying you thought the
19 recording was long gone and that you were blindsided
20 with recent news about it?

21 A Yes.

22 Q In that the recording, a "man admits to being
23 a serial rapist on it"?

24 A Yes.

25 Q In this exchange, are you explaining to Blithe

1 your plans for posts you'd like to make about Mouna
2 Apperson?

3 A Yes.

4 Q Did you frequently make plans to post about
5 Mouna Apperson?

6 A No.

7 Q Is it fair to say that at least some of your
8 posts had significant planning involved?

9 A No.

10 Q Why did you feel a need to plan out any posts
11 about Mouna Apperson in advance of making them?

12 A I wanted to be articulate and I wanted to warn
13 the appropriate people who needed to be warned.

14 Q But that was the exception to your posts;
15 planning, is that what you're saying?

16 A I oftentime -- yes.

17 Q So, more often the posts were spontaneous?

18 A Yes.

19 Q Have you listened to the recording?

20 A Yes.

21 Q Do you recall Ms. Caplan, stating near the
22 beginning of the recording, "I'm here because Tasha
23 reached out to me personally and we've been keeping in
24 contact and I want everybody to be on the same page"?

25 A Yes.

1 Q Can you describe your knowledge of the nature
2 of this conversation?

3 A All I know is that I was informed that the
4 roommates were going to talk to their fellow roommate
5 Apperson and that they were going to discuss the
6 multiple allegations of abuse and rape. I gave Claire
7 permission to use my name.

8 Q And who is the person who mediated this
9 conversation?

10 A I do not know.

11 Q You were aware that this mediator was
12 participating in this conversation on your behalf?

13 A No.

14 Q So prior to the conversation happening, you're
15 saying that you did not know she was going to have this
16 conversation?

17 A I did not know that it would be a conversation
18 like that, no.

19 Q But that there would be a conversation?

20 A Yes.

21 Q What did you expect it to be?

22 A I expected it to be an opportunity for the
23 people living in the house to express their concerns
24 about their safety.

25 Q So, when you say you didn't expect it to be

1 this type of conversation, what do you mean by that?

2 A I did not expect Apperson to go into detail
3 about our relationship or even acknowledge I existed.

4 Q So, considering you've made various statements
5 at various times regarding your knowledge of the
6 recording, can you clarify when you actually discovered
7 there was a recording?

8 A When I truly understood there really was a
9 recording was at the beginning of October 2018.

10 Q Did you tell several people that Mouna
11 Apperson admits to committing rape on this recording?

12 A Yes.

13 Q Are you aware whether any of the people
14 present during that conversation were armed?

15 A No.

16 Q Did anyone make threats toward Mouna Apperson
17 during this conversation?

18 A No.

19 Q Did anyone tell Mouna Apperson they should
20 kill themselves?

21 A Yes.

22 Q Did anyone tell Mouna Apperson the world would
23 be a better place without them?

24 A Yes.

25 Q And when did you become aware of these

1 statements?

2 A Not until January of 2019.

3 Q Did you know these statements had been made to
4 Mouna Apperson when you spoke public -- publicly about
5 this recording?

6 A I'm sorry, what?

7 Q Did you know these statements had been made to
8 Mouna Apperson when you spoke publicly about the
9 recording?

10 A No.

11 Q Have you ever described this recording as a
12 serial rapist confession?

13 A I do not recall.

14 Q Let's take a look at Exhibit 3, Page 4.
15 Messages with Benjamin Singer. And you see the -- where
16 it's marked up there on the screen?

17 A Yes.

18 Q Can you tell me what that says?

19 A "And it's two hours of a guy acting like
20 describing being a serial rapist is the same as sharing
21 what he ate for breakfast."

22 Q Where does Mouna Apperson state that they have
23 raped anyone?

24 A They say in the recording that by their own
25 standards and how they have changed, they've raped

1 everyone they've been with, including me, prior to their
2 new knowledge of understanding consent.

3 Q Is there anywhere in that recording the words
4 "I raped Tasha"?

5 A I do not recall.

6 Q But you've said those words to people, right?
7 You've stated that in messages to people?

8 A I have stated that Apperson admitted to raping
9 me, yes.

10 Q You used the word -- let's take a look at the
11 Exhibit 19, message between you and Jordan Ault. Again,
12 mostly redacted. Who is Jordan Ault?

13 A A family friend.

14 (Exhibit 19 identified.)

15 Q Page 4. This is your -- let's go to the
16 previous page, you can see where it starts. So this is
17 your -- it's a long message, but right at the end there,
18 that last sentence at the beginning, it says "I raped
19 Tasha." You say he goes on, referring to Mouna, to say
20 the words, quote, I raped Tasha, end quote. So you have
21 stated that specific term to people?

22 A Okay.

23 Q Is that -- that's yes; you agree that's your
24 message?

25 A I agree that is my message.

1 Q And that the recording where you represented,
2 during this conversation, that the recording would
3 reflect a statement by Mouna that says "I raped
4 Tasha" -- I'll rephrase that. Is it your contention
5 today that Mouna Apperson utters the words "I raped
6 Tasha" in the recording?

7 A No.

8 Q Is it fair to say that telling someone that
9 Mouna Apperson said those words when they did not would
10 be a misrepresentation?

11 MS. KELLERMAN: I'm going to object as to
12 calls for a legal conclusion, misrepresentation for
13 purposes of the elements of the allegations in this
14 case. You can answer, subject to that.

15 A Listening to that tape was very traumatic for
16 me. It was possible I did not remember the exact
17 details of what happened in that tape when I was
18 recounting it to Jordan.

19 Q (By Mr. Kershman) But it's fair to say, if
20 you are quoting -- you quote -- you put in quotes, I
21 raped Tasha. It's fair to say that that would be a
22 misrepresentation to this individual?

23 A In the quotes, yes.

24 Q Would you agree that a misrepresentation could
25 harm a person's reputation?

1 A Can you repeat the question in a different
2 way?

3 Q Would you agree that such a statement could be
4 damaging to an individual's reputation?

5 A Yes.

6 Q I'd like you to look again at Exhibit 10, Page
7 136, it's back to these messages with Sawyer.

8 MS. KELLERMAN: What page?

9 MR. KERSHMAN: 136.

10 Q (By Mr. Kershman) You see where you ask,
11 okay, right there, 12:37, "Is there enough stuff on
12 that tape for me to press charges?" That's what
13 you're asking, right?

14 A Yes.

15 Q And the reply there is "Hmrrrrrr, I'd have to
16 give it another listen." Do you see that on Page 135?

17 A Yes, sir.

18 Q And then, right there, at 12:46, "So they
19 didn't just straight up say 'I raped, 'I abused,'"
20 question mark?

21 A Yes.

22 Q That's back in November of 2017.

23 A Yes.

24 Q And the response, "No, we would say, do you
25 think you abused Tasha?" Let's go to Exhibit -- Exhibit

1 20, Page 91. This is your conversation with Rodney
2 McGruder -- Rodney Brown -- right?

3 A Yes.

4 (Exhibit 20 identified.)

5 Q And you say right there, "He literally said 'I
6 raped Tasha,'" October 2018?

7 A Yes.

8 Q Approximately how many people did you reach
9 out to regarding Mr. Apperson?

10 A I do not recall.

11 Q You don't remember exactly how many, is that
12 what you're saying?

13 A Yes.

14 Q Did you reach -- reach out to people who were
15 dating Mouna to try to encourage them to not date Mouna?

16 A No.

17 Q Did you ask people to record -- to report
18 Mouna's dating profile?

19 A I do not recall.

20 Q So you might have?

21 A It's possible.

22 Q Did you seek out to find as much damaging
23 information about Mouna as you could?

24 A No.

25 Q Did you publicly attack people when they

1 refused to help you attack Mr. Apperson?

2 A Publically attack how?

3 Q With similar posts you've made throughout
4 here.

5 A I spoke out against Dhoruba Shakur. I do not
6 recall speaking out against anyone else.

7 Q Did you want to harm Mr. Apperson?

8 A No.

9 Q Did you hope Mouna would lose their job
10 because of your allegations?

11 A No.

12 Q But you reached out to employers?

13 A I reached out to TREX.

14 Q And it was not your desire to see Mouna lose
15 their job?

16 A It was my desire to make sure that people were
17 safe.

18 Q What; that Mouna was going to rape people in
19 the workplace, is that what you believed?

20 A Yes.

21 Q Based on what?

22 A Based on my experiences with Mouna and based
23 on the stories other people had told me.

24 Q Your experience with Mouna, Mouna had --
25 you're claiming Mouna raped you in the workplace?

1 A No.

2 Q But it's just based on your experience and
3 what you've heard from other people, you are -- it was
4 your opinion that that was going to happen?

5 A Yes.

6 Q And that was your responsibility to tell
7 Mouna's employers?

8 A Yes. Only TREX.

9 Q Who all told you that Mouna would rape people
10 at the place of employment?

11 A Nobody told me in specific terms that Mouna
12 would rape anyone at their place of employment.

13 Q All right. But you testified that it was a
14 concern of yours and you felt it an obligation to warn
15 an employer --

16 A Yes.

17 Q -- just in case that might happen?

18 MS. KELLERMAN: Just object. Are you saying
19 that TREX is his employer? You keep using the word
20 "employer."

21 MR. KERSHMAN: Well, I've asked her, so she
22 said no.

23 Q (By Mr. Kershman) So it's no employer?
24 You've not told an employer? Did you tell an
25 employer?

1 A No.

2 Q All right. The TRES was renting space, office
3 space?

4 A Yes.

5 Q Okay. So, to rephrase that question, you felt
6 it was your obligation to warn those folks from who he
7 was renting space, in order to protect the safety of the
8 other -- other inhabitants of the work space?

9 A Yes.

10 Q And you en -- did you encourage people to use
11 the hashtag "occupy Radix" on social media?

12 A I did not encourage it.

13 Q Did you have anything to do with establishing
14 the hashtag?

15 A No.

16 Q Did you make statements supporting those
17 hashtags?

18 A Yes.

19 Q Did you hope Mouna would have to move because
20 of the statements that you made?

21 A No.

22 Q What were you hoping?

23 A I was hoping that the people in that house
24 would be given safe passage out of the house and
25 reasonable accommodation.

1 Q Did you attempt to interfere with Mouna's
2 romantic relationships?

3 A No.

4 Q Was it your hope that any of Mouna's romantic
5 relationships would end?

6 A For their safety, yes.

7 Q So it's your belief that Mouna raped everybody
8 they had a relationship with?

9 A I don't know.

10 Q But it's your hope that any romantic
11 relationship that they had would end for the safety of
12 whoever it is that they're having a romantic
13 relationship with?

14 A It was my hope that the person in a romantic
15 relationship with Apperson would be aware of their past
16 and be able to make an informed decision for themselves.

17 Q And that past involved no actual convictions
18 for any crime for sexual assault, correct?

19 A I am not aware of that, no.

20 Q You have no evidence that Mouna has any
21 convictions for sexual assaults?

22 A No.

23 Q No what?

24 A I do not have any evidence of that.

25 Q But you felt it was your responsibility to

1 warn people of someone's past from which there was no
2 convictions?

3 A Yes.

4 Q Was it your hope that social causes Mouna
5 pursued would be undermined by your allegations?

6 A No.

7 Q What -- what was -- were your -- were you
8 aware that allegations that you made would inhibit
9 Mouna's ability to be involved in social causes?

10 A Yes.

11 Q Earlier you were talking about -- and I don't
12 want to misphrase you so I'm going to say just
13 generally -- about contributions that Mouna may have
14 made to whether it was a charity or other organizations,
15 was your opinion similar here where you felt that any
16 support or causes that Mouna would pursue would be
17 illegitimate, any financial contributions they made?

18 A Can you rephrase the question?

19 Q Did you believe that any participation by
20 Mouna in social causes would be inappropriate?

21 A I believe they would be unsafe.

22 Q Who is "they"?

23 A I believe that the involvement would be
24 unsafe.

25 Q Unsafe for every person in the -- regarding

1 the social causes?

2 A Yes.

3 Q Did you hope Mouna would leave town as a
4 result of your allegation?

5 A I thought it would be a potential outcome but
6 it wasn't a reason why I spoke up.

7 Q Do you feel Mouna should be forced to leave
8 St. Louis?

9 A Presently, no.

10 Q Do you believe Mouna should continue to be
11 ostracized socially and for any of those potential
12 causes that they may support because of your
13 allegations?

14 A For the safety of the people involved, yes.

15 Q Did you coordinate with Rodney Brown to pursue
16 your allegations against Mouna?

17 A I don't understand the question.

18 Q With respect to any of these allegations
19 you've made against Mouna that you've published quite
20 frequently, did you coordinate with Rodney Brown to
21 pursue any of these allegations against Mouna?

22 A I spoke with Rodney about my experience.
23 Rodney shared his experience.

24 Q Have you had conversations with any other
25 parties regarding your allegations against Mouna,

1 parties to this lawsuit?

2 A I have not been in contact with Adrian since I
3 was sued.

4 Q What about Rodney Brown?

5 A Rodney has been in touch with me. I have not
6 responded.

7 Q Did you ever discuss your goals regarding your
8 publication of these allegations prior to this lawsuit
9 with these defendants?

10 A I created a list of outcomes that I would like
11 to see happen, which included education, charity,
12 ownership, and accountability.

13 Q When you say charity, what do you mean by
14 that?

15 A Giving money to causes that were pertinent to
16 the wronged parties.

17 Q I'm sorry, to the what -- to the wronged
18 parties?

19 A Yes.

20 Q In what manner?

21 A I don't understand the question.

22 Q Earlier you thought that it would be
23 inappropriate for Mouna to essentially contribute money
24 to anybody for any cause, so here, part of what you
25 would want to see happen is to have Mouna contribute to

1 the causes for the -- what you're alleging are these
2 injured parties?

3 A Yes.

4 Q In what manner?

5 A Fiscally.

6 Q Pardon me?

7 A Fiscally.

8 Q Explain that to me.

9 A That they should donate to charities that work
10 on the matters of inner partner violence and the
11 antisemitism and racism.

12 Q I just want to make sure I understand your
13 testimony; that it would be -- in your mind --
14 appropriate for Mouna to contribute to those charities?

15 A As an act of restitution, yes.

16 Q And so, back to like what manner -- so, it
17 would be more than just writing a check to them, if I
18 understand you correctly, right?

19 A It would be education as well.

20 Q So if Mouna just wrote a check to these folks
21 and these charities, that would be enough for you?

22 A No.

23 Q Let me strike that. Wrote a check to these
24 organizations and underwent some kind of education?

25 A And took accountability.

1 Q And what do you mean by accountability?

2 A Admit what they did and do the work necessary
3 to offset the harm that was caused to the best of their
4 ability.

5 Q Wasn't your testimony that they did admit this
6 in a recording, that you believe they did; took
7 accountability?

8 A They did not take full accountability for what
9 happened.

10 Q I'll have you take a look at Exhibit 20. It's
11 going to be messages between you and Defendant Brown.
12 Page 141, at the very bottom, can you read that?

13 A "I appreciate you believing me and supporting
14 me. Also, it's really helpful to know that Nick drives
15 a green SUV now."

16 Q Why did you find it helpful to know what kind
17 of car Mouna drives?

18 A Because Mouna has habitually stalked me and I
19 did not know that they had a new car.

20 Q You had an order of protection that was
21 dismissed based on your claims that they stalked you.

22 A Yes.

23 Q How did you plan to use this information about
24 Nick -- I mean, pardon me -- about Mouna's car?

25 A To be aware of my surroundings.

1 Q What did you -- why did you feel the need to
2 speak with Brown about your allegations against Mouna?

3 A Because Brown had been through a lot, too, and
4 I wanted him to know he was not alone.

5 Q With respect to this lawsuit, were you served
6 in this matter before Rodney Brown?

7 A I don't understand the question.

8 Q You were -- when this lawsuit was initiated,
9 were you served with notice of the -- of the litigation
10 against you?

11 A Yes, I was served.

12 Q Do you know whether you were served before
13 Rodney Brown?

14 A I do not recall.

15 Q So you might have been, you just don't
16 remember?

17 A It's possible. I do not know.

18 Q Did you assist Rodney Brown in avoiding
19 service?

20 A No.

21 Q Did you assist Norman?

22 A No.

23 Q Have you ever told any of the other defendants
24 in this case when they might expect to be served?

25 A I do not recall.

1 Q So you might have?

2 A It's possible.

3 Q Have you ever warned them when the court has
4 issued a subsequent alias summons?

5 A I don't know what that means.

6 Q You raise an affirmative defense in your
7 answers to Mouna's petition, is that correct?

8 A I don't understand the question.

9 Q You've -- in your response to the petition,
10 you've raised what's called an affirmative defense,
11 which is based on the contention that you relied on the
12 advice of counsel in pursuing your previous police
13 reports, civil case, and order of protection against
14 Mouna Apperson, is that correct?

15 A Yes.

16 Q Was your current attorney representing you for
17 any of these matters?

18 A No.

19 Q Who was representing you when you filed your
20 police report?

21 A Chelsea Merta.

22 Q Who was representing you during the order of
23 protection?

24 A Elad Gross.

25 Q Pardon me?

1 A Elad Gross.

2 Q Who was representing you for your civil suit
3 suing Mouna Apperson?

4 A Chelsea Merta.

5 Q And you are not currently represented by any
6 of those attorneys who you claimed advised you to pursue
7 those matters?

8 A No.

9 Q But you agree that your defense to this matter
10 is that you previously pursued litigation or otherwise
11 legal action against Mouna Apperson based on the advice
12 you received from your previous attorneys?

13 A Yes.

14 Q Just want to take you back real quick, just a
15 couple more questions about your relationship with
16 Mouna. When did you first meet Mouna?

17 A I met Mouna on OkCupid in August of 2012.

18 Q And when did -- when did your romantic
19 relationship with them begin?

20 A August of 2012.

21 Q And how would you describe your feelings
22 toward Mouna while you were in that relationship?

23 A I loved them and I was afraid of them.

24 Q Would you describe -- strike that. How long
25 was your relationship with Mouna Apperson, start to

1 finish?

2 A From August 2012 to August 2013.

3 Q Would you describe the relationship as
4 consistent or did the two of you take breaks?

5 A It was consistent.

6 Q During the course of your relationship, you
7 developed -- did you develop a desire to break up with
8 Mouna?

9 A Multiple times.

10 Q Did you claim to be disinterested in Mouna?

11 A No.

12 Q Did you ever tell anyone that Mouna felt you
13 were disinterested and was concerned if you still liked
14 being with them?

15 A Yes.

16 Q Do you recall who ultimately made the decision
17 to end your relationship, you or Mouna?

18 A I did.

19 Q How would you describe your relationship with
20 Mouna after you were no longer dating?

21 A I was afraid of them based on the last things
22 they had said to me when we ended our relationship.
23 They continued to contact me against my wishes.

24 Q What was the last thing they said to you?

25 A That I was going to get raped.

1 Q Do you have that in writing?

2 A No.

3 Q Recorded?

4 A No.

5 Q Did they say this to you -- allege this has
6 been said to you more than once?

7 A No, they said -- they said it once to me.

8 Q Is that the last time you spoke to them?

9 A Yes.

10 MS. KELLERMAN: Are you talking verbal?

11 MR. KERSHMAN: Yes.

12 MS. KELLERMAN: Okay. Just to clarify.

13 MR. KERSHMAN: Can we take a break, please?

14 MS. KELLERMAN: Yeah.

15 MR. KERSHMAN: Thanks.

16 THE VIDEOGRAPHER: We are going off the record
17 at 1:57 p.m.

18 (Break taken.)

19 THE VIDEOGRAPHER: We are back on record at
20 2:08 p.m.

21 MR. KERSHMAN: That is all the questions I
22 have for you.

23 MR. BUTTERFIELD: I don't have any questions
24 for you.

25 MS. KELLERMAN: I don't have any questions.

1 Tasha, would you like to review the transcript and
2 sign or would you like to waive reading?

3 THE WITNESS: Waive reading.

4 MS. KELLERMAN: Thank you.

5 THE VIDEOGRAPHER: This is the end of the
6 deposition. The time is 2:08 p m. We are going off
7 the record.

8 (Ending time of the deposition: 2:08 p.m.)

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MR. BUTTERFIELD:
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MS. KELLERMAN:
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