

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF APPEARANCES

JOHN D. KERSHMAN FOR THE PLAINTIFF
AHEARN KERSHMAN, LLC
230 S. BEMISTON AVENUE
SUITE 1005
CLAYTON, MISSOURI 63105
314-373-7135

TENEIL LEE KELLERMAN FOR THE DEFENDANT
GROWE, EISEN, NATASHA KAMINSKY
KARLEN & EILERTS VIA ZOOM
120 SOUTH CENTRAL AVENUE
SUITE 150
CLAYTON, MISSOURI 63105
314-725-1912

MICHAEL S. BUTTERFIELD FOR THE DEFENDANT
BRINKER & DOYEN ADRIANE NORMAN
34 NORTH MERAMEC AVENUE VIA ZOOM
CLAYTON, MISSOURI 63105
314-863-6311

MELISSA KING VIDEOGRAPHER
ARCHWAY LEGAL SERVICES VIA ZOOM
1513 FAIROAKS DRIVE
TROY, ILLINOIS 62294
618-530-6225

MOUNA APPERSON ALSO PRESENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF EXAMINATIONS

DIRECT EXAMINATION BY MR. KERSHMAN.....PAGE 7

CERTIFIED QUESTIONS

PAGE 90, LINE 24, THROUGH PAGE 91, LINE 17

PAGE 93, LINE 3, THROUGH PAGE 93, LINE 17

PLAINTIFF'S INDEX OF EXHIBITS*

EXH	DESCRIPTION	IDENTIFIED
8:	TEXT MESSAGE	75
10:	TEXT MESSAGES	85
44:	TEXT MESSAGES	86
52:	TEXT MESSAGES	16
53:	SCREENSHOT OF FACEBOOK POSTS	74
55:	444 PAGES OF EMAILS	6

*ORIGINAL EXHIBITS RETAINED BY COUNSEL FOR PLAINTIFF.

1 THE VIDEOGRAPHER: This is the Zoom
2 video-recorded deposition of Adriane Norman.
3 Today's date is November 4th, 2022. The time is
4 10:10 a.m. Central Standard Time.

5 This is the case of Mouna Apperson,
6 formerly known as Nicholas Apperson, v. Natasha
7 Kaminsky, Adriane Norman, and Rodney Brown, Case
8 Number 19SL-CC00805, Division 9. This case is
9 pending in the Circuit Court of St. Louis County,
10 State of Missouri.

11 My name is Melissa King and I am
12 representing Archway Legal Services.

13 Counselors, will you please state your
14 appearance?

15 MR. KERSHMAN: John Kershman for the
16 plaintiff.

17 MR. BUTTERFIELD: Michael Butterfield
18 for defendant, Adriane Norman.

19 MS. KELLERMAN: Teneil Kellerman for
20 defendant, Natasha Kaminsky.

21 THE VIDEOGRAPHER: The court reporter is
22 Julie Stelfox with Metro Court Reporting, and she
23 will now swear in the witness.

24 ADRIANE NORMAN,
25 being produced, sworn, and examined on behalf of

1 the Plaintiff, deposeth and saith:

2 MR. BUTTERFIELD: Mr. Kershman, if I may
3 briefly, I'd like to make a record of the fact
4 that we were provided with 444 pages of purported
5 emails between Adriane Norman and plaintiff for
6 the first time minutes before plaintiff's
7 deposition on November 2nd of this year despite
8 the fact that defendant's written discovery had
9 requested any such purported emails years ago and
10 the fact that they purport to be written
11 statements made by a party concerning the
12 litigation at issue.

13 No emails were ever provided by
14 plaintiff or even identified in these discovery
15 responses. These are clearly discoverable and
16 they should have been produced years ago and
17 instead were provided on a thumb drive minutes
18 before the deposition two days ago.

19 Given the unfair surprise and the
20 prejudice to Miss Norman, I'm going to move to
21 strike any and all questions and answers relating
22 to -- regarding or even premised upon Plaintiff's
23 Exhibit 55, those 444 pages of emails.

24 I'm also giving notice of my intent to
25 seek leave to depose plaintiff on those emails,

1 including but not limited to when they were found
2 and provided to their attorney. I just want to
3 make that record. So...

4 MR. KERSHMAN: All right. So any other
5 questions on there, we'll, you know, we'll make
6 that record. You make that objection and we'll go
7 from there.

8 MR. BUTTERFIELD: Okay. Will you give
9 me a continuing objection so I don't have to --

10 MR. KERSHMAN: Yes, yes.

11 MR. BUTTERFIELD: -- keep interrupting?

12 MR. KERSHMAN: Yes.

13 MR. BUTTERFIELD: All right. Thank you.

14 MR. KERSHMAN: All right.

15 DIRECT EXAMINATION

16 BY MR. KERSHMAN:

17 Q. Would you please state your full name
18 for the record.

19 A. Adriane Norman.

20 Q. Adriane, my name is John Kershman. I'm
21 an attorney. I represent Mouna Apperson. Have
22 you ever had your deposition taken before?

23 A. No.

24 Q. All right. So there's a court reporter,
25 of course, here. I know that you can't

1 necessarily see them. They're there; they're
2 going to make a record. So I'd ask that you
3 please make sure you're answering the questions
4 out loud so they can hear you.

5 We have to agree, too, that we don't
6 talk over each other. I can be bad about that at
7 times, so we'll have to give each other that. I
8 ask the question, I let you answer, and we don't
9 talk over each other.

10 If I ask you a question you don't
11 understand, that you'll please ask me to repeat it
12 or rephrase it. If you answer my question, we're
13 all going to presume you understood that question.

14 Is that fair?

15 A. Yes.

16 Q. And also you can take a break any time
17 you want, at any point, if that's something you
18 need to do, all right?

19 A. Okay.

20 Q. Okay. What is your date of birth?

21 A. November 18th, 1989.

22 Q. And where do you presently live?

23 A. Orlando, Florida.

24 Q. And how long have you lived there?

25 A. Um, I'm sorry, um, I -- I lived here and

1 then I moved away and then I lived here again, so
2 that's why I am struggling, but I originally lived
3 here since I was 16. Then I lived in St. Louis
4 for four years and then I moved back, so like
5 around 12 years total, I guess.

6 Q. How long have you been where you are
7 right now? I wasn't following you completely.
8 Without the back and forth. Just how long have
9 you been where -- in the house that you're in
10 right now?

11 A. Hm -- oh, okay. About two years.

12 Q. All right. Do you own that property or
13 rent?

14 A. I own it.

15 Q. All right. And you mentioned you used
16 to live in St. Louis, correct?

17 A. Right.

18 Q. What brought you to Florida?

19 A. Do you mean like originally or, um...

20 Q. Right now. What brought you to where
21 you are right now? Why did you move there?

22 A. Like my mom. I moved to Florida because
23 to be next to my mom and my stepdad.

24 Q. All right. Are you currently employed?

25 A. Yes.

1 Q. And where do you work?

2 A. I work at Wal-Mart Specialty Pharmacy.

3 Q. And what is it that you do there?

4 A. I am a pharmacist.

5 Q. How long have you been a pharmacist?

6 A. Since -- well, I graduated school in May
7 of 2018. I got my license I think around January
8 2019.

9 Q. Where did you go to school?

10 A. St. Louis College of Pharmacy.

11 Q. Where did you go to undergraduate
12 school?

13 A. University of Central Florida.

14 Q. Miss Norman, how do you know the
15 plaintiff?

16 A. I dated him.

17 Q. When did you first meet them?

18 A. I met them in -- around -- I think
19 around April -- I'm not exactly sure. I don't
20 want to guess, but I believe I met them around
21 April of 2016.

22 Q. And when did you -- I mean, you were in
23 a romantic relationship with them, is that
24 correct?

25 A. Right.

1 Q. And when did that relationship begin?

2 A. Around April of 2016.

3 Q. And how would you describe your feelings
4 towards Mouna while you were in the relationship?

5 MR. BUTTERFIELD: Just object. I think
6 it's a little overbroad, but go ahead.

7 A. Okay. I had a lot of different
8 feelings, depending on the time of the
9 relationship, but I guess -- I guess at one -- at
10 some point I would say that I thought that I loved
11 -- well, at that time Nick was the name. I don't
12 know if I'm supposed to refer -- because when I
13 dated them, they were Nick. (Inaudible.)

14 Q. All right. That's fair.

15 A. So now we call him Mouna.

16 Q. Sorry to talk over. That's fair. If at
17 any point you reference Nick, we'll know that
18 that's Mouna that you're referring to, agreed?

19 A. Okay.

20 Q. All right. And how long was your
21 romantic relationship with Mouna Apperson?

22 A. It was roughly a year in length.

23 Q. Can you tell me when that relationship
24 ended?

25 A. I believe roughly around March of 2017.

1 Q. Would you describe your relationship as
2 consistent or did the two of you take breaks?

3 A. I would say it was breaks. There were
4 some off and on between dating and not dating.

5 Q. Do you recall why your relationship with
6 Mouna Apperson ultimately ended?

7 A. There -- I guess this is a yes or no.
8 Yes.

9 MR. BUTTERFIELD: Could you repeat the
10 question perhaps, John? Sorry.

11 Q. Did she recall why her -- why your
12 relationship with Mouna ultimately ended?

13 A. Yes.

14 Q. Can you tell me why?

15 A. It ultimately ended when I moved out and
16 told him that he had been abusive.

17 Q. Were you ever jealous of Mouna Apperson
18 when they were in contact or otherwise engaged
19 with other individuals?

20 A. Um, I guess -- sorry, just --

21 MR. BUTTERFIELD: I'll object to the
22 form. Go ahead.

23 A. I guess, yes, if you -- I guess I could
24 say yes.

25 Q. Did you ever express any concerns to

1 Mouna Apperson during your relationship about them
2 talking to or otherwise engaging with other
3 individuals?

4 A. Yes.

5 Q. Have you engaged in any kind of sexual
6 conduct with Mouna Apperson?

7 A. Yes.

8 Q. Was that consensual?

9 A. There was some consensual sexual contact
10 and there was some that I did not consent to.

11 Q. When you and Mouna Apperson engaged in
12 sexual conduct, were you ever incapacitated?

13 A. I was not.

14 Q. Were you capable of giving consent?

15 A. I actually at one point specifically
16 told him that I could not consent.

17 Q. You say there was a -- one time that you
18 said that?

19 A. I actually pleaded with him multiple
20 times, telling him that, due to the pressure he
21 was putting on me, I could not consent, and I
22 asked him not to.

23 Q. You say "multiple times."

24 A. Yes.

25 Q. How many times are you referring to?

1 A. I don't remember exactly because it was
2 a -- it was a period of time and I don't remember
3 how many times it happened.

4 Q. Why had you not discontinued your
5 relationship with Mouna?

6 MR. BUTTERFIELD: Are you talking about
7 then?

8 MR. KERSHMAN: Yes.

9 A. I -- I didn't discontinue the
10 relationship because I wanted to be with him.

11 Q. Did Mouna Apperson ever physically force
12 you to engage in sexual conduct with him?

13 A. Can you repeat that question?

14 Q. Did Mouna Apperson ever physically force
15 you to engage in sexual conduct with him?

16 A. He didn't ask. He just -- I guess I
17 don't know. I didn't fight it, but he didn't -- I
18 don't -- I don't -- I'm not sure on that.

19 MR. BUTTERFIELD: Could you rephrase the
20 question, or do you need him to rephrase the
21 question?

22 A. He -- physically force, I -- he did it
23 and I didn't -- I guess I was not completely
24 restrained, so I don't know.

25 Q. Maybe we can break that down a little

1 more. So if I understood, the answer was you
2 believe that you were physically forced but you
3 weren't restrained? Was that the answer?

4 And I apologize, I'm not trying to trick
5 you or be rude. I just want to make sure that we
6 are able to get your whole story, that I'm able to
7 know what you're going to tell the jury.

8 A. Did -- so the question that you're
9 asking me is did he ever physically force -- force
10 himself on me, right?

11 Q. That's correct.

12 A. Is that the question?

13 Q. That is the question.

14 A. I guess I wasn't choked or anything, if
15 like that's what you're asking. Like I wasn't
16 incapacitated. So I don't know. I don't know how
17 to answer that, but I'm having difficulty with the
18 question.

19 MR. BUTTERFIELD: I think there's a
20 disconnect between what is actually meant by
21 "physically forced." If you want to maybe ask it
22 in a different way or break it down a little bit
23 more.

24 MR. KERSHMAN: No, maybe later. We can
25 move on for now.

1 MR. BUTTERFIELD: Well, I'll object to
2 the form then.

3 MR. KERSHMAN: All right.

4 Q. Moving along, let's take a look at some
5 exhibits. Have you ever told Mouna Apperson that
6 you wanted to engage in sexual activities with
7 them?

8 A. Yes.

9 Q. Okay. Let's take a look at Exhibit 52.
10 Here -- there's a lot of pages here of texts,
11 okay? We've got several thousands, so we'll have
12 to --

13 MR. BUTTERFIELD: How many pages?

14 MR. KERSHMAN: There's several thousand
15 of them. I'm not going to -- obviously not going
16 to go through all of them, but, um --

17 MR. BUTTERFIELD: Well, I just don't
18 recall seeing several thousands of pages of text
19 messages being produced in discovery. That's why
20 I'm asking.

21 MR. KERSHMAN: I don't have any other --
22 any knowledge that they weren't produced, but we
23 can -- we'll talk about that later. My --

24 MR. BUTTERFIELD: Yeah, I don't want to
25 interrupt you, I'm sorry. Go ahead.

1 MR. KERSHMAN: Yeah. My understanding
2 was these -- this was -- these were produced by
3 prior counsel.

4 Q. So you did -- did you and Mouna text one
5 another? Yes?

6 A. Yes.

7 Q. Okay. And so you're aware, too, I don't
8 have any photographs in here. I don't have any
9 actual recordings. It's just purely line by line.

10 A. Okay.

11 Q. So let's go to page 23. It's going to
12 be page 23. The date on there is 4/25 of '16.
13 It's going to be at -- the time would be 10:45:26.
14 It's pretty hard to see that. I don't know what
15 it's like on your end.

16 MR. KERSHMAN: Are you able to locate
17 that?

18 THE VIDEOGRAPHER: I'm not sure what she
19 -- oh, I see. Page 23? I have nine pages for
20 this particular exhibit. Do you know which one
21 it's on?

22 MR. KERSHMAN: The text, Exhibit 52 with
23 the text.

24 THE VIDEOGRAPHER: (Inaudible.) 23. I
25 apologize.

1 THE REPORTER: Can you understand
2 everything she's saying?

3 MR. KERSHMAN: She was just saying that
4 she had to get the correct exhibit. That's all.
5 Being the -- yeah.

6 Q. Are we able to see that? I'll apologize
7 because I'm -- besides that my eyesight is
8 terrible, it's pretty -- pretty rough to see, but
9 do you -- have you been able to identify the text
10 from 4/25 of '16 at 10:45:26?

11 A. Yes.

12 Q. And there Mouna texted you, right, where
13 they says, "I really like that you look at things
14 like this critically with an open mind. I
15 certainly feel that the sex we have is healthy"?
16 You see that, right?

17 A. I do.

18 Q. And what is your response after that?
19 Can you read that, please?

20 A. It says, "Yeah, I think the more
21 assertive I am in telling you what I want/like and
22 the more receptive you are, the better it is. Our
23 sex is good stuff."

24 Q. Let's go on to page 29, and so we're on
25 page 29 because I'm going to -- I don't have the

1 exact time right in front of me. I've got to find
2 it, but it starts with "Also I appreciate you
3 making a special effort." I don't know if it's
4 easy to find on there. It's at 18:58:48.

5 THE VIDEOGRAPHER: Got it.

6 Q. Do you see that?

7 A. Uh-huh.

8 Q. Can you please read that?

9 A. Yes. It says, "Also I appreciate you
10 making a special effort to focus on pleasing me
11 last night. I enjoyed hearing your personal
12 stories this morning. I like having more
13 background information on how you came to be the
14 wonderful person you are."

15 MR. KERSHMAN: Do all of you hear any
16 kind of feedback or background noise? Off the
17 record a second.

18 MR. BUTTERFIELD: Yeah, just a little
19 bit.

20 MR. KERSHMAN: Okay.

21 THE VIDEOGRAPHER: Are you saying you
22 want me to go off the record?

23 MR. KERSHMAN: Yeah, just for a moment.
24 I just was asking if anybody else noticed the
25 background noises. I just wanted to make sure it

1 just wasn't me.

2 MS. KELLERMAN: I can hear it a little
3 bit. I don't think I -- I was muted, so I don't
4 think it's coming from my space.

5 MR. KERSHMAN: All right. All right.
6 As long as it's not interfering, if everybody can
7 hear otherwise, okay, right?

8 MR. BUTTERFIELD: Hey, Adriane, can you
9 hear all right?

10 THE WITNESS: I can -- I can hear okay.

11 MR. BUTTERFIELD: Okay.

12 Q. All right. We're going to keep going
13 here on this Exhibit 52, page 36. It's going to
14 be a May 7 of 2016 at the time of 11:55:22. Do
15 you see that? It starts with "I want to see."

16 A. I see it -- are you talking to me?

17 Q. Yes, I am.

18 A. I don't see where it says, "I want to
19 see."

20 Q. 11:55:22, let's see if I can find it.
21 Let's go on to page 92 through 93.

22 MR. BUTTERFIELD: What was that, John?

23 MR. KERSHMAN: 92. We're going to look
24 at 92 and 93.

25 MR. BUTTERFIELD: Thanks.

1 Q. Adriane, in the meantime I'm going to
2 ask you, you do recognize these as being a fair
3 and accurate representation of the text messages
4 between you and Mouna Apperson, the ones that
5 you've seen so far?

6 A. Yes, the ones that I've seen so far do
7 look accurate.

8 Q. All right. So we're at 92, 93 at 23:55.
9 It would be June 5th.

10 THE VIDEOGRAPHER: Are you asking me to
11 pull up a specific time?

12 MR. KERSHMAN: Yeah, let's go to June
13 5th at 23:55.

14 THE WITNESS: Has someone asked a
15 question? I didn't hear anything.

16 MR. BUTTERFIELD: I don't think so.

17 THE WITNESS: Okay.

18 MR. KERSHMAN: All right. We're going
19 to need to take a break. I don't know why I don't
20 have anything syncing up at the moment.

21 THE VIDEOGRAPHER: We are going off the
22 record. The time is 10:39 a.m. Central Standard
23 Time.

24 (Temporary recess was held.)

25 THE VIDEOGRAPHER: All right. Are we

1 ready to jump back on?

2 MR. BUTTERFIELD: I am if everyone else
3 is.

4 MR. KERSHMAN: Yeah, I guess give me
5 just one second.

6 THE VIDEOGRAPHER: Okay.

7 MR. KERSHMAN: All right. Sorry,
8 everybody, I'm ready to go back.

9 MR. BUTTERFIELD: (Inaudible.)

10 THE VIDEOGRAPHER: All right. Stand by.
11 We are back on the record. The time is
12 10:52 a.m. Central Standard Time.

13 Q. All right. We were talking about these
14 text messages, and there was quite a few in here
15 that are you-all having intimate conversations.

16 I'll -- I'm going to point one out to
17 you now. I'm not going to ask you to read it but
18 you can look at it, and it's going to be page 249,
19 9- -- September 7th of '16. It's going to be at
20 9:59:13.

21 I'm going to have you -- do you see
22 those, Adriane?

23 A. I see it, yes.

24 Q. Yeah, it's, up there, it starts with the
25 "I feel the need to validate us sexually," right?

1 A. Mm-hmm.

2 Q. Okay. And is it fair to say you-all had
3 quite a few of these types of text messages back
4 and forth?

5 A. I guess so.

6 Q. Are those -- is that, what you're
7 looking at, that string there, is that a -- does
8 that look like a fair and accurate representation
9 of the text messages you exchanged with Mouna?

10 A. So, yes, this is a text -- this is an
11 example of a text message that does look accurate.
12 If I'm being asked does this represent all of our
13 communication, I would say no.

14 Q. No, I'm asking you if this -- what this
15 is right here is with respect to just text
16 messages. If that's, what you are seeing, if
17 that's a fair and accurate representation?

18 A. Yes, this -- this text is accurate and
19 fair.

20 Q. All right. Have you ever told Mouna
21 Apperson that you wanted to marry them?

22 A. Yeah, I think so. I'm not -- I don't
23 remember one hundred percent, but I definitely
24 could have.

25 Q. And have you ever told Mouna Apperson

1 that you wanted to have children with them?

2 A. I think -- I think so.

3 Q. During the course of your relationship
4 did you ever accuse Mouna Apperson directly of any
5 sexual misconduct?

6 A. Can I have clarity on that question or
7 something more specific?

8 Q. Did you -- you had discussed earlier
9 that you can identify what you thought were times
10 when there wasn't consent on your part.

11 So while you were in your relationship
12 with Mouna Apperson, did you ever accuse them
13 directly, in other words, talking to them directly
14 or on the phone or through text, accuse them of
15 sexual misconduct directed towards you?

16 A. I guess to answer if it's directly
17 explicitly while I was in the relationship, if I
18 ever said a -- "You're raping me or you're
19 sexually assaulting me," the answer to that is no.

20 Q. When did you accuse Mouna Apperson of
21 the sexual misconduct?

22 A. It was, what I remember, it was after I
23 moved out of Radix House.

24 Q. And after your relationship, of course,
25 right?

1 A. Right.

2 Q. Do you recall about how long afterward?

3 A. I believe so. I believe it was the
4 morning -- I moved out in the evening and then it
5 was, I believe, it was the morning after I moved
6 out that I told him.

7 Q. How did you do that? Was it in writing?
8 Was it email? Was it text?

9 A. I believe it was writing. I don't
10 remember if it was text, but I think it probably
11 was text.

12 Q. Do you have records of those
13 accusations?

14 A. I do not.

15 Q. You don't have the ability to get any of
16 the text messages that you had between yourself
17 and Mouna Apperson?

18 A. Unfortunately, I don't.

19 Q. Can you tell me why?

20 A. I do not have the phone that I had at
21 that time.

22 Q. Do you have the same phone service?

23 A. I do not.

24 Q. And what phone service did you have at
25 that time?

1 A. I believe I had AT&T.

2 Q. And it didn't seem like you were
3 completely sure whether it was text. Is it
4 possible it could have been by email?

5 A. It's possible.

6 Q. So discussing the end of your
7 relationship, did Mouna break up with you on May
8 22nd of 2016?

9 A. I would say no.

10 Q. No, that -- okay. So no to the date, no
11 to Mouna breaking up with you?

12 A. I would say no to breaking up with me.

13 Q. All right. Why don't you tell me what
14 your understanding was concerning the end of your
15 relationship with Mouna?

16 A. So, I mean, it was an on again/off again
17 kind of relationship, but it was deteriorating
18 towards the end. I remember that I had asked to
19 see other people because I was feeling trapped,
20 and then Nick had said he didn't think that there
21 was going to be a long-term with us.

22 Q. There was -- I'm sorry, I didn't hear
23 that. There's going to be what with us?

24 A. A long-term, like a long-term future,
25 like marriage, kids, things like that, but he was

1 telling me, "Oh, but, you know, don't -- like I
2 still want you to be here. You know, I still want
3 to be with you, but it's just not long-term,"
4 which it does sound like a breakup, but he was
5 telling me to stay still.

6 And then eventually I started feeling
7 that I had been abused and that I had been gaslit
8 and I moved out, and then the next day I told him
9 about it.

10 Q. And you told him about it. Did you say
11 you told him about it the next day? I'm sorry, I
12 couldn't hear you particularly well.

13 A. Sorry. Yes, I did say the next day
14 after I moved out.

15 Q. Can you describe for me what you mean by
16 did you say gaslit?

17 A. I did say that.

18 Q. What do you mean by that?

19 A. So by gaslit, I mean that he had, over
20 time, undermined me and my thought process and my
21 -- things that I would say or believe in and make
22 me unsure of basically if I could trust what I
23 thought because, with his reality, he was telling
24 me something else, and so made me almost -- made
25 me think like maybe I'm crazy.

1 Q. Do you -- did he -- did Mouna do that
2 with other people or just with you, about you?

3 MR. BUTTERFIELD: Objection. Calls for
4 speculation. Go ahead.

5 A. I just want to understand the question.
6 Can you -- you're saying did he do that, are you
7 asking me if he --

8 Q. The --

9 A. Sorry. Go ahead.

10 Q. The description you were giving of how
11 he gaslit you, was that just to you personally or
12 in front of other people or both?

13 A. So you're asking if he gaslit me in
14 front of other people or if he only did it in --
15 to me in front of me?

16 Q. That is correct.

17 A. A lot of the times we hung out was
18 private, just the two of us, so we really didn't
19 hang out with other people very often. So I don't
20 -- I don't remember if he did that in front of
21 other people.

22 Q. And could you give me an example of
23 something that they would do that would fall into
24 the category of being gaslit that you described?

25 A. So, for example, if I told them, you

1 know, I didn't like some way that they talked to
2 me or treated me, one thing that -- I mean, it was
3 -- would just kind of confuse me.

4 Like he would say something like, "Well,
5 you know, that's not fair. I'm not even a man,"
6 and then I would feel bad and I would say, "You're
7 right, I'm sorry." Like, you know, and he would
8 get me to apologize because he would just -- he
9 would just change things, what I was talking
10 about.

11 I'm sorry, I'm not really making sense,
12 but I guess he -- he told me like I guess what --
13 in the end, when I was upset at him for, you know,
14 emotionally abusing me, he said that, "Well, maybe
15 you're just splitting."

16 Basically -- I mean, he basically was
17 telling me I can't trust myself or my thoughts and
18 that I'm crazy.

19 Q. Did they use those words expressly to
20 you?

21 A. Did he tell me? Yes, he used the word
22 "splitting."

23 Q. And thought that your -- gave you
24 feedback that your views were crazy?

25 A. I don't -- I don't know that he used the

1 word "crazy," but he just over time with many --
2 like slowly over time with many conversations
3 would just tell me I'm wrong sometimes about like
4 little things and then bigger things and just get
5 me to not trust myself.

6 Q. Did you accuse Mouna Apperson of bad
7 sexual behavior in response to being broken up
8 with?

9 MR. BUTTERFIELD: Objection. Form,
10 foundation.

11 A. I was taking a second to break down that
12 question in my head. So you're asking me did I
13 accuse him of sexual misconduct because --

14 Q. No.

15 A. Okay. Sorry.

16 Q. No. Let's take a look at Exhibit 52 at
17 page 54.

18 A. Okay.

19 Q. It will be May 23rd, 9:24:31. Can you
20 read that, please?

21 A. It says, "No, that's not why you're not
22 asking me for that support anymore. You're not
23 asking me for it because you are sexually
24 frustrated and not happy with how that affects the
25 way you act.

1 "And, no, you can't be in a healthy,
2 monogamous relationship if you can't handle
3 someone not wanting to sleep with you once in a
4 while. You say it's about how I handled it, but
5 that's not the case. It's about how you handled
6 it.

7 "Even when I checked in with you, you
8 found problems because you were upset in the first
9 place. I've never had someone react the way you
10 did to me not wanting to have sex. And it was not
11 even like I don't have a sex drive or that you
12 were very deprived because we normally did have
13 sex. It was disrespectful of me, really, entitled
14 behavior, and just rude."

15 Q. And this is a text message from you to
16 Mouna after you broke up, is that correct?

17 A. No. I'm sorry, wait. That says 2016,
18 so I think that would have been early on because
19 we started dating in April of 2016. So, but it
20 was off and on.

21 I'm sorry, what was the question?

22 MR. BUTTERFIELD: I think you answered
23 it.

24 THE WITNESS: Okay.

25 Q. I'll have you take a look at 55.

1 MR. BUTTERFIELD: Again, just reiterate
2 my objection, to which I think you agreed, that it
3 would be a continuing objection.

4 Q. So on 55, look at the time of 10:53:19,
5 please.

6 MR. BUTTERFIELD: You mean Exhibit 50 --
7 I think 55 is the emails.

8 MR. KERSHMAN: My bad. I apologize.
9 It's Exhibit 52.

10 MR. BUTTERFIELD: I'll make sure for the
11 record.

12 MR. KERSHMAN: I think we're on the
13 right one. It's just the page.

14 Q. Adriane, can you go ahead and read that
15 message?

16 A. Yeah. It says, "I'm upset that you
17 broke up with me and that it was over sex. And
18 I'm upset that I didn't do it first. I wish I
19 didn't put in any effort and didn't give a" -- can
20 I curse on here?

21 Q. You sure can.

22 MR. BUTTERFIELD: Yeah.

23 A. Okay. "And didn't give a shit and broke
24 up with you right away when you first got upset
25 about it."

1 Q. So does -- from this -- is this an
2 accurate text from your exchanges between yourself
3 and Mouna Apperson?

4 A. Yes.

5 Q. Is this referring to a time where your
6 relationship ended but you might have gotten back
7 together or is this the end of -- end-end of the
8 relationship?

9 A. So this is May of 2016, so it was
10 actually towards the beginning of -- of things
11 because then we dated into 2017.

12 Q. So I just want to ask you, too, for
13 clarification on these -- on this particular text,
14 to be clear, you're saying that Mouna Apperson was
15 sexually frustrated?

16 A. Yes.

17 Q. Also, for clarity, you're saying that
18 you made your lack of interest known?

19 A. When I didn't want it, yes, I did. I
20 mean, you can see I said, in the other texts I
21 think that you pulled up, I even stated, you know,
22 I didn't want sex all the time, and he was upset
23 about it.

24 Q. But Mouna Apperson didn't force anything
25 on you?

1 A. Over that --

2 MR. BUTTERFIELD: Objection. Form.

3 A. Over that relationship, through the
4 course of the relationship, yes, he did.

5 Q. At this time that we're talking about
6 here, where you're all talking about Mouna being
7 sexually frustrated, you telling them that you
8 weren't interested all the time.

9 At that time was -- did Mouna Apperson
10 force anything with you?

11 A. I don't -- I don't think so at that time
12 because that was pretty early on.

13 Q. All right. A little bit further down
14 the same page at 11:02:17 do you see where you
15 say, "Yeah, I wish I broke up with you first"?

16 A. Yes.

17 Q. And then -- now, soon thereafter did you
18 drop off Mouna Apperson's stuff in their front
19 yard?

20 A. I don't remember.

21 Q. Is it possible that you did?

22 A. It's possible.

23 Q. Well, let's just look -- we can look at
24 these texts. It's the next page.

25 A. Okay.

1 Q. At 11:16:23. Do you see that? "I'm
2 dropping off your sled right now. I don't want to
3 hold anything of yours"?

4 A. Yes.

5 Q. Do you recall now that time?

6 A. Yes, I see it. Yes. It looks accurate.

7 Q. Okay. So that was something that you
8 dropped off in their front yard?

9 A. I believe so, yes.

10 Q. Do you think that you overreacted to
11 being broken up with at that time?

12 MR. BUTTERFIELD: Object to form,
13 foundation. I don't think she ever said that he
14 broke up with her. Go ahead.

15 Q. Well, she says it in the text, but go
16 ahead.

17 A. Okay. So I guess I -- dropping off the
18 sled, like is that the overreaction? What else
19 did I -- I guess, no, I don't think I did.

20 Q. All right. So do you think it could be
21 -- do you think it could scare someone to dump
22 their things in their front yard?

23 A. I didn't dump it. I dropped it off. It
24 was his. I would think he would want it back.

25 Eventually, he would have to get it

1 somehow, so I brought it to his place. So I don't
2 see why -- no.

3 Q. What if it were the other way around?
4 What if Mouna had dropped things of yours into
5 your front lawn? Would that be concerning to you?

6 A. During the time that we were dating I
7 had my own property and I broke up with him and he
8 dropped off my stuff. I don't think so, no.

9 Q. It didn't -- you're saying it did not
10 bother you to --

11 A. No, I don't -- I don't think it would.

12 Q. Give me a second. I'm trying to see if
13 I have a piece of an exhibit that I want you to
14 look at.

15 Is it fair to say you were upset at this
16 point with this breakup?

17 A. Yes.

18 Q. Why were you upset about the breakup?

19 A. I felt -- I guess I just felt that -- I
20 felt like he was breaking up with me because he
21 wasn't getting enough sex and so I just felt like
22 really hurt by that.

23 Q. It was -- was that a relationship you
24 wanted to continue, though, if you were saying you
25 were not interested in it?

1 A. I -- I didn't want to be forced to have
2 sex that I didn't want, but I did want to be with
3 Nick.

4 Q. So you're pretty upset at Nick. You
5 could see in those string of texts around where
6 you were talking about where the sled is in the
7 yard. It's the May 23rd.

8 A. Mm-hmm.

9 Q. And you could see 11:38:07 you text
10 "Fuck you and your sexual needs"?

11 A. Oh, yeah, mm-hmm.

12 Q. Did you subsequently ask for emotional
13 support from Mouna the next day after dropping off
14 their sled in the front yard?

15 A. Um, I could have. I'm guessing, since
16 you're asking me, it's probably there in the text.
17 So if you want to show it to me, I probably did
18 say that since you're asking me. I don't remember
19 exactly, but...

20 Q. You continue to engage with Mouna
21 Apperson after this breakup here?

22 A. I did, yes.

23 Q. But you were -- were you still angry
24 with Mouna for breaking up with you?

25 A. I don't remember how long I was upset,

1 but when -- eventually I wasn't upset with it and
2 got over it.

3 Q. Do you recall being angry and expressing
4 it verbally in these texts after?

5 A. Yeah, I can see here that I -- the texts
6 that's highlighted right now -- was upset and I
7 did express it.

8 Q. Do you recall about how long you
9 continued to be upset at them and continued to
10 express that to them?

11 A. I don't.

12 Q. Was it more than a month?

13 A. I wouldn't think so, but I don't
14 remember exactly how long it was.

15 Q. Did you ever tell Mouna Apperson that
16 you wanted to get back together?

17 A. I don't remember. Maybe I did. If it's
18 there -- like I don't remember all that saying...

19 Q. Did you and Mouna Apperson ever get back
20 together?

21 A. Yes, we did.

22 Q. When?

23 A. I don't remember the exact date, but I
24 know that this is only May and we were dating all
25 the way through March, so it was some point we got

1 back together.

2 Q. Did you continue to show sexual interest
3 in Mouna Apperson?

4 A. I did.

5 Q. And when again did your relationship
6 with Mouna Apperson ultimately end for good?

7 A. So I think I mentioned it was -- it did
8 deteriorate. It was off and on, off and on, and
9 deteriorated, and then I would say like the final
10 ending point would be where I packed my things, I
11 moved out, and then I told him he had been
12 abusive.

13 Q. Did you tell them that you were upset
14 that they didn't want to be with you long-term?

15 A. I did.

16 Q. Did you have any desire for Mouna --
17 that Mouna Apperson would suffer consequences for
18 ending the relationship with you?

19 A. No.

20 Q. Did Mouna Apperson ask you to return the
21 key to their home when the relationship ended?

22 A. Yes.

23 Q. Did you return the key to Mouna's home
24 right away?

25 A. I believe I did not.

1 Q. Why not?

2 A. I just, I didn't. I don't know -- have
3 any -- any real reason.

4 Q. Would you find it problematic if someone
5 kept a key to your home without consent?

6 A. Yes.

7 Q. I'm going to move ahead and ask you some
8 questions about accusations you made against Mouna
9 publicly. So have you made any accusations of
10 misconduct against Mouna Apperson?

11 A. To -- publicly, is that what you're
12 asking? If I made public accusations against --

13 Q. Yes.

14 A. No.

15 Q. Have you made accusations of misconduct
16 against Mouna Apperson to other people that you
17 know?

18 A. Yes.

19 Q. Can you tell me those people that you
20 made those accusations to?

21 A. I can. Oh, I made the accusations to --
22 to -- I'm sorry I'm taking so long. To Rodney
23 Brown, to (inaudible).

24 THE REPORTER: I'm sorry?

25 Q. We just need you to speak up a little

1 bit clearer, please.

2 A. Yes, yes. I have -- to Laura Calding,
3 to Mary Bifocal, Jessie Simones, Isaiah Qualls,
4 Tasha Kaminsky, Jessie Sequiera, April Wright.
5 That's what I'm remembering right now.

6 Q. All right. Thank you for going through
7 that with us. How all did you communicate --
8 strike that.

9 In what manner did you communicate that
10 to those folks that you just listed?

11 A. So verbally and as well as text.

12 Q. Any -- did you make any posts on public
13 -- let me rephrase that.

14 Do you recall making any posts to
15 message boards or groups, whether it's on
16 Facebook, Twitter, to these folks about your
17 allegations of sexual misconduct by Mouna Apperson
18 against you?

19 A. I did not make any posts saying Mouna
20 Apperson sexually assaulted me or abused me.

21 Q. Have you claimed that Mouna Apperson
22 raped you at least twice a day?

23 A. No.

24 Q. Is the claim that Mouna Apperson raped
25 you, is that based on your perception that they

1 asked you to have sex often?

2 A. No. I wouldn't say asking to have sex
3 often is rape.

4 Q. And that's -- you're saying that that's
5 not the basis for your claims against Mouna?

6 A. Correct.

7 Q. I'm going to jump around in exhibits,
8 but -- on pages, but let's first start at page 22.
9 Go back to page 22 of the same exhibit that we
10 were on.

11 MR. BUTTERFIELD: Of 52?

12 MR. KERSHMAN: Yes.

13 MR. BUTTERFIELD: Okay.

14 Q. The message of April 25th at 10:44:03,
15 it's near the bottom of the page on 22, and it
16 will continue into the next page.

17 Adriane, take your time, take a look at
18 that, and let me know when you finish reading
19 that.

20 A. Okay. I've read it.

21 Q. All right. So you're -- you're -- there
22 -- is it fair to say there you're describing a
23 prior experiences prior -- experiences prior to
24 Mouna that you had interpreted as rape? Is that
25 fair to say?

1 A. Actually, it looks like I wrote that I
2 did -- I didn't consider it rape.

3 Q. And then, too, at the very last sentence
4 -- or the second one there you said, "However, I
5 don't think it's always rape," and then you say,
6 "and I don't think that -- I don't think the sex
7 with you and I have is rape," and you're saying
8 that about Mouna Apperson, right?

9 A. Yes, and I would just add to that that
10 this is April of 2016, so this is when we first
11 started dating, and this was brought up by Nick
12 having concerns. He wanted me to reassure him
13 because he had felt like he had raped people
14 before.

15 Q. And you say that in there? Is that
16 contained in these -- in the text anywhere over
17 there?

18 A. I didn't see it in the text, no.

19 Q. So finish what you're saying. The
20 context of -- I believe you were saying that you
21 believe they had communicated to you that they had
22 raped somebody before and wanted to make sure they
23 weren't doing it to you? I don't understand.

24 A. So this thing here, PIV, is something
25 that I hadn't heard of. Nick, when I first

1 started dating him, was really stressing to me
2 that I understand through a fundamist lens.

3 He wanted to make sure I understand
4 consent and things like that, and he brought up
5 the idea that -- I've never heard of PIV, which is
6 a term I never heard of, and he was saying like,
7 well, there's some fundamists that think PIV is
8 always rape, and so he asked me to look into it.

9 I did, and then I was basically telling
10 him like, no, I don't think that PIV is always
11 rape, and so this whole conversation was kind of
12 brought up by Nick and his concerns that I
13 understand sex basically and his concerns he had.

14 Q. So let me just make sure I understand
15 you. From --

16 A. Mm-hmm.

17 Q. From my point of view listening to you,
18 it sounds as if Nick was concerned, Nick being
19 Mouna Apperson, was concerned about your feelings
20 and your perception and was having a conversation
21 with you about it to ensure that their interaction
22 with you in the relationship was inside the scope
23 of consent by your deposition -- definition.

24 You don't think that's fair to say?

25 A. I could see how you would interpret it

1 that way, but I don't.

2 Q. Then what are you interpreting this as?

3 A. I think he's -- it was a step in his
4 process basically to basically clear himself and
5 basically say, "Well, look somebody said that I'm
6 not raping them" because he had a --

7 Q. So is that your --

8 A. Hm-hm, go ahead.

9 Q. So this is your testimony here right now
10 that Mouna had put this much thought into their
11 process of raping you by demonstrating empathy and
12 concern for you?

13 MR. BUTTERFIELD: Objection.
14 Mischaracterizes her prior testimony. Foundation.
15 Form. Go ahead.

16 A. I don't think that it came from empathy
17 or concern. I think it came from a guilty
18 conscious. I think that he had previous people
19 complain about their experience with him, and he
20 wanted to get somebody that he dated to basically,
21 very early on, say, no, this is -- this isn't
22 rape.

23 Q. Okay. Now, just help me understand how
24 you came to this conclusion. What is it based on?

25 A. Nick had told me that he had haters and

1 he was trying to -- working with someone to try to
2 handle the -- the haters that he had.

3 Q. He told you that haters and he was
4 working with someone?

5 A. He was very cryptic. He didn't share me
6 -- he didn't give me details on things. He was
7 very private, but he did just -- he did share that
8 he said he had a fan club and then he said he also
9 has haters, and he was working with some people to
10 handle the haters.

11 Q. Is it fair to say that you were well
12 aware, during your relationship with Mouna
13 Apperson, that they generally preferred to be with
14 more than one person at a time, right?

15 A. When I met Nick or Mouna -- Nick at the
16 time -- they did say they're polyamorous and they
17 said that's their identity, so it's who they are
18 as a person.

19 Q. So you understood that about them going
20 into this relationship, right?

21 A. I did.

22 Q. And did you expect them to change
23 because you were in a relationship with them?

24 A. I would say Nick also was aware that I
25 was monogamous. I made that very clear at the

1 beginning as well, and we still decided to date.

2 I didn't want -- and I wouldn't consider
3 us serious unless we weren't seeing other people,
4 from my perspective.

5 Q. So at this time, with this message that
6 we have highlighted right there, in the
7 relationship that you are in with Mouna, did you
8 think any of your sexual relationships with them
9 was anything but consensual and part of the
10 relationship that you-all had?

11 A. I -- and, again, this is very early on
12 in the relationship, and he did treat me
13 differently as it went on. It didn't start out
14 bad, but I would say that, up until this point, I
15 didn't think it was rape, but I didn't think that
16 we were having nonconsensual sex.

17 Q. But if I'm understanding you correctly,
18 after you've broken up, you can look back here and
19 then now you will say that you were experiencing
20 being raped during your relationship with Mouna?

21 A. Yes, there were -- yes, there was rape
22 during this relationship, yes.

23 Q. Can you give me an example?

24 A. Um, well, I can.

25 Q. Please go ahead.

1 A. Um, so there was a time when Nick had
2 come with me to Florida, and we were driving. I
3 believe Nick -- Nick was driving; I was in the
4 passenger seat of the car. It was nighttime, and
5 he -- he pulled into a parking lot, and I really
6 wasn't sure what he was doing but I was -- I was
7 going with him, and I was a little confused but I
8 was trusting him, and then he's like, "Come on."

9 He didn't tell me like what he was
10 doing, and so I followed him from the parking lot
11 to like a wooded area, and he started kissing me
12 and things like that, and he got behind me, and I
13 realized what he was going to do and I didn't want
14 it so I said, "Stop."

15 Then he -- he paused. He paused. He
16 kissed me, and then he -- he went ahead and did
17 it, and so -- so that -- that's what happened.

18 Q. After he kissed you and proceeded, did
19 you reiterate, "No, I don't want to do this"?

20 A. I didn't say it again, no.

21 Q. Have you ever had a spontaneous
22 intercourse with people that you have dated in
23 your experience dating people and having
24 intercourse with them?

25 A. I have.

1 Q. Will you classify all those times as you
2 being raped?

3 A. I wouldn't.

4 Q. Why are you classifying this particular
5 example as rape?

6 A. Because I had said stop and because I
7 didn't want it. I didn't -- I didn't enjoy it. I
8 didn't want it.

9 Q. But you made no other effort than the
10 very first instance of it -- well, let me back up.

11 You would agree that it's not a typical
12 place for people to have intercourse, is that fair
13 to say?

14 A. Yes.

15 Q. Is it -- are you sensitive to having sex
16 with anyone in any other place but a bedroom?

17 A. I mean, is it -- that's a tough
18 question. I would say that, if it's not in the
19 bedroom, then -- yeah, it varies, if it's not in
20 the bedroom, that if I would be comfortable having
21 sex or not.

22 Q. Have there been other times that you've
23 been in a location with other people that you
24 weren't necessarily comfortable with having sex
25 and proceeded to have sex?

1 MR. BUTTERFIELD: I'm just going to
2 object to this line of questioning. I think it's
3 irrelevant, but go ahead.

4 Q. I'll tell you why I'm going -- I'm going
5 to tell you why it's relevant. You're accusing
6 Mouna Apperson of raping you, okay?

7 MR. KERSHMAN: "Rape" is an
8 extraordinarily serious word to use, and that's
9 what I'm asking her about, and I want her to
10 explain her definition of "rape" and explain --

11 MR. BUTTERFIELD: Well, I think -- I
12 think she did explain this situation pretty
13 adequately --

14 MR. KERSHMAN: -- to me how this is rape
15 and how there's no other time she was raped.

16 MR. BUTTERFIELD: Nick was driving, she
17 was a passenger, it was nighttime --

18 THE REPORTER: Sir, sir, you're going --

19 MR. KERSHMAN: This isn't -- you don't
20 get to testify.

21 THE REPORTER: You're going to have to
22 start over.

23 MR. BUTTERFIELD: I'm not, but you're --
24 you're not asking the question right --

25 THE REPORTER: Stop.

1 MR. BUTTERFIELD: -- so that's why I'm
2 explaining this.

3 (Discussion was held off the record.)

4 MR. BUTTERFIELD: But I said go ahead
5 and answer subject to the objection, so...

6 MR. KERSHMAN: And I apologize, Michael,
7 for getting a little agitated. You have your
8 objection --

9 THE REPORTER: Which I --

10 MR. BUTTERFIELD: I apologize as well.

11 THE REPORTER: -- don't have on the
12 record.

13 MR. KERSHMAN: Yeah, why don't -- you
14 can go ahead and state your objection, Michael. I
15 apologize for interrupting you.

16 MR. BUTTERFIELD: I apologize as well,
17 John. I just wanted to object to the form and
18 foundation of the question, but, Adriane, if
19 you're able to answer, please do so.

20 THE WITNESS: Can you repeat the
21 question, please?

22 Q. I'm asking you about other times that
23 you've had spontaneous sex with other sexual
24 partners in a location that you weren't
25 particularly comfortable with, if you now consider

1 that to have been raped by that individual at that
2 time.

3 MR. BUTTERFIELD: I'll object to the
4 form of the question. Foundation. Go ahead.

5 A. Is this -- the reason I'm taking a while
6 is because it's -- I feel like there's a lot of
7 things in that question, but I feel like the
8 question is assuming that I've had sex with
9 someone in a place where I was not -- someone else
10 in a place where I was not comfortable.

11 So my answer to the question -- which
12 your question was would I consider it rape in
13 instances where I've had sex with somebody else in
14 a place that I'm not comfortable with?

15 If that -- because if that were -- the
16 foundation for rape basically is -- is not the
17 location. What makes it rape is I didn't want it,
18 and I would say that's what it is: Is that I
19 didn't want it.

20 Q. You didn't want it. Have there -- have
21 there been any other times with other of your
22 sexual partners that you didn't initiate sex and
23 maybe weren't even in the mood for sex but that
24 you had sex with those individuals?

25 A. Yes.

1 Q. Is it your testimony then that, every
2 one of those times, that you were raped?

3 A. No.

4 Q. Why not?

5 A. So I guess for -- I wasn't initially in
6 the mood and then I changed my mind and this was
7 like, "Okay, you know, we can have sex," to me
8 that's not -- that's not rape if I changed my mind
9 and then said, you know, like, "Okay, that's fine,
10 we can -- we can go ahead and do it," if I wasn't
11 in the mood initially.

12 Q. Have you been, by your own perception,
13 raped by other individuals than Mouna Apperson?

14 A. Um, I have.

15 Q. How many times have you been raped by
16 other individuals than Mouna Apperson?

17 A. I don't remember how many times, but
18 with Mouna, just because it was -- he was pretty
19 consistent.

20 Q. I'm asking you about other people. You
21 said you had been raped -- I asked you if you had
22 been raped by other individuals that you had sex
23 with.

24 A. Mm-hmm.

25 Q. You said yes.

1 A. I have. Yes, I have.

2 Q. How many times?

3 A. Um, at least one.

4 Q. Can you tell me who that was with?

5 A. Yeah. It was, um -- you want the

6 person's name?

7 Q. Yes, please.

8 A. His name was -- it was Joey.

9 Q. What was his last name?

10 A. Wright.

11 Q. Where were you located when you were

12 with Joey Wright? Where were you living --

13 A. His room.

14 Q. -- at the time? I'm sorry, I talked

15 over you. Where were you living at the time?

16 A. Where was I living?

17 Q. Yes.

18 A. Oh, I was living with my parents.

19 Q. In Florida?

20 A. Yes.

21 Q. So this is a relationship you had with

22 an individual in Florida. When?

23 A. I think it was 2008 or 2009.

24 Q. What part of Florida was this?

25 A. Orlando.

1 Q. Can you describe that incident for me,
2 please?

3 A. I can. Joey was my boyfriend, and we
4 had not had sex before and I had told him I was
5 not ready to do that yet, and we were in his room
6 and he, um -- oh, I don't know. Can you hear me?
7 Can you hear me okay?

8 Q. Yes.

9 MR. BUTTERFIELD: Yes.

10 A. Oh, okay. Sorry. And basically we were
11 in his room, we were kissing, and he, basically,
12 he basically did -- did it and I had felt and I
13 was really upset and then he said, "Sorry."

14 Q. Were there any other times that,
15 contemplating this all now, that you would contend
16 you've been raped?

17 A. Um --

18 Q. Are you currently in a relationship?

19 A. I am.

20 Q. Excuse me?

21 A. Yes.

22 Q. You are in a relationship right now?

23 A. I am.

24 Q. Are you married?

25 A. I am.

1 Q. And who are you married to?

2 A. His name is Homolo.

3 Q. His last name?

4 A. Gonzalez.

5 Q. When were you-all married?

6 A. We got married May 21st of 2018.

7 Q. Do you have -- have you had any sexual
8 experience with your husband where your husband
9 has initiated it spontaneously without getting
10 your permission first?

11 MR. BUTTERFIELD: I'm going to object.
12 I think this is improper inquiry. This is spousal
13 matters that have no relevance to this case in
14 that I think she testified that she had verbally
15 told Mr. -- I'm sorry -- Mouna that she did not
16 want to have sex, and so I think this location and
17 this spontaneity is only an aspect of that, I
18 guess, idea that this is rape or that was rape.

19 So I just -- and I just think this is
20 private matters, John. I'm not trying to be
21 obstructionist. It's just --

22 MR. KERSHMAN: Fair enough. I'll move
23 on from that.

24 MR. BUTTERFIELD: -- it's spousal
25 matters.

1 MR. KERSHMAN: Fair enough. All right.
2 Why don't we all break for lunch. It's noon. Do
3 you want to just go ahead and do that now?

4 MR. BUTTERFIELD: Yeah, that would be
5 great. Sorry, John, I just --

6 MR. KERSHMAN: Fair enough. You're
7 doing your job. Okay. So let's, yeah, let's go
8 ahead and take a break and we'll -- we all will
9 meet back 1 o'clock Central Time?

10 MR. BUTTERFIELD: Perfect.

11 MS. KELLERMAN: Do we have to keep the
12 Zoom open or do we leave Zoom and come back, or
13 does it matter?

14 THE VIDEOGRAPHER: Mine will be open so
15 I can readmit you if you want to close it.

16 MS. KELLERMAN: Okay.

17 THE VIDEOGRAPHER: We are going off the
18 record. The time is 12:01 p.m. Central Standard
19 Time.

20 (Lunch recess was held from 12:01 p.m.
21 to 1:02 p.m.)

22 THE VIDEOGRAPHER: We are back on the
23 record. The time is 1:02 p.m. Central Standard
24 Time.

25 Q. All right. Adriane, I'm going to try to

1 pick up where we left off.

2 I'm going to turn back to the
3 accusations against Mouna Apperson, and you gave a
4 list of some folks that you told about -- about
5 those accusations. I might ask some repetitive
6 but just to confirm whether I have those folks
7 right.

8 There was a Stephanie Aria. Is that
9 somebody that you --

10 A. Uh --

11 Q. Sorry. Go ahead.

12 A. So that's not somebody that I listed,
13 but I do know her, or I did know her. I haven't
14 spoken with her in a long time. I don't recall
15 directly speaking with her. She may have heard
16 about it, but I don't -- I don't remember sharing
17 -- reaching out to her and sharing about it.

18 Q. What about Suzy Ann?

19 A. I don't know who Suzy Ann is.

20 Q. A Jessie S.?

21 MR. BUTTERFIELD: Sorry?

22 Q. Jessie S., like Jessie last initial
23 being S.

24 A. Jessie Sequiera?

25 Q. That could very well be. You're

1 familiar with that individual?

2 A. Yes.

3 Q. Okay. Is that somebody you had told
4 about your accusations?

5 A. Yes.

6 Q. And Julia -- Julie, sorry, Julie Setele,
7 S-e-t-e-l-e?

8 A. Yes.

9 Q. Justine Collum, Column, C-o-l-l-u-m?

10 A. Yes.

11 Q. Cori Bush?

12 A. Hm, I don't remember reaching out to
13 Cori Bush directly. She may have heard, but I
14 don't recall reaching out to her.

15 Q. And April Wright?

16 A. Yes.

17 Q. Are you aware that Mouna Apperson' house
18 is/was known as the Radix House?

19 A. Yes.

20 Q. Are you -- were you familiar with the
21 hashtag Occupy Radix?

22 A. Yes.

23 Q. Have you posted on social media using
24 the hashtag Occupy Radix?

25 A. Yes.

1 Q. Why did you do that?

2 A. I posted that to show solidarity for
3 that -- that movement.

4 Q. What was your understanding of that
5 movement?

6 A. So my understanding was that Radix House
7 was supposed to be -- belong to the activist
8 community in its conception. So my understanding
9 was that basically, um, that that movement was to
10 make the house a house for the activist community.

11 Q. All right. But you're aware that Mouna
12 Apperson owned the home, right?

13 A. I apologize. I had a -- my audio just
14 changed, my headset. Give me one second. My
15 headset just went off. Can you hear me?

16 MR. BUTTERFIELD: Yep. Yeah, take your
17 time.

18 MR. KERSHMAN: Yeah.

19 MR. BUTTERFIELD: Sorry, John.

20 MR. KERSHMAN: No worries.

21 THE WITNESS: Can -- can I get a headset
22 or would you want me to answer the question first?

23 MR. KERSHMAN: You can go ahead and get
24 -- get a headset. We can take a short break here
25 for you to do that.

1 THE WITNESS: Okay. Give me one moment.

2 MR. BUTTERFIELD: Okay.

3 MR. KERSHMAN: Mm-hmm.

4 THE VIDEOGRAPHER: You want me to take
5 it off the record?

6 MR. KERSHMAN: Sure.

7 THE VIDEOGRAPHER: All right. We're
8 going off the record. The time is 1:07 p.m.
9 Central Standard Time.

10 (Discussion was held off the record.)

11 THE VIDEOGRAPHER: All right. Ready to
12 go back on the record?

13 MR. KERSHMAN: Yes.

14 THE VIDEOGRAPHER: Stand by. We are
15 back on the record. The time is 1:08 p.m. Central
16 Standard Time.

17 Q. Adriane, back to the hashtag Occupy
18 Radix, were you aware that the people occupying
19 Radix is Mouna Apperson's home that they owned?
20 Are you aware of that?

21 A. I was aware that Mouna Apperson owns
22 Radix House.

23 Q. And you were aware that Mouna Apperson
24 lived in that house?

25 A. I was aware, yes.

1 Q. So you were -- you were essentially
2 supporting this group that excluded Mouna Apperson
3 from their own home?

4 A. Yes.

5 Q. And tell me why you thought that was
6 appropriate to remove the owner of a home from
7 their own home.

8 A. So the post that I made that had Occupy
9 Radix -- hashtag at Occupy Radix on it was a
10 posting in solidarity with that movement. When
11 Nick created Radix House, it was his idea. Like
12 he named it Radix House and said that it would
13 belong to the community.

14 When I posted that, it -- it was
15 basically just being in solidarity with that
16 movement that would make Radix House a house for
17 the St. Louis activist community.

18 Q. Right. And so, I mean, back to my
19 question --

20 A. Yeah.

21 Q. -- that -- explain to me how it is
22 appropriate to support the physical removal of
23 someone from the home that they own.

24 A. Well, I would not say that I support the
25 physical removal of someone from a home or

1 anything like that.

2 Q. Was --

3 A. My understanding -- mm-hmm, go ahead.

4 Q. Because it was -- you were aware that
5 that is exactly what was happening, though, is
6 that correct?

7 A. No, that's not correct. I wasn't aware
8 that somebody was physically removing Mouna from
9 their home.

10 Q. Were you aware -- but you were aware
11 that Mouna effectively could not enter back into
12 their own home because of this movement?

13 A. No, I didn't know that.

14 Q. And nowhere did -- at no time did you
15 believe that Mouna would be effectively excluded
16 from their own personal property?

17 A. I didn't know if -- if they would be or
18 not. Yeah, I didn't -- I didn't have any way to
19 know that.

20 Q. But did you -- did you believe that
21 Mouna's property should be -- or should
22 essentially belong to the community?

23 A. That's what I understood was the concept
24 of Radix House, from its conception when Mouna
25 created it, is that it would belong to the

1 activist community. He said he didn't believe in
2 private property ownership.

3 Q. Were you aware of Mouna giving ownership
4 to the community in any way?

5 A. I was aware that Mouna told the people,
6 who lived there when I did, that the house would
7 belong to them, and that, even though they were
8 paying monthly amounts, that was -- you could
9 consider rent, he was saying that it's just going
10 to bettering the house and that this house is --
11 is for the community.

12 Q. And who all was paying rent, that you're
13 aware of?

14 A. The people who were living there when I
15 was there were Mary Bifocal, Laura Calding, Rodney
16 Brown, and -- who am I missing? Jessie Simones
17 was living there. Isaiah Qualls also lived there;
18 although, I'm not sure how he and Rodney split
19 their rent because they were a couple sharing a
20 room. So I'm not sure how they did that.

21 Q. Are you -- is your testimony that you
22 knew that all of those people you mentioned above
23 were paying rent?

24 A. I -- I guess I can't say I know for
25 sure, no. That -- that, I don't want to make that

1 assumption.

2 That's what I thought they were doing,
3 but I don't have any -- like I can't say I know
4 one hundred percent.

5 Q. So is it possible that none of those
6 people you mentioned were paying rent at all?

7 A. No, that would not be possible, because
8 I lived there. I saw them with the rent checks.
9 So, I mean, I don't know every single one of them
10 always paid rent or something like that, but I did
11 see that.

12 Q. Did you tell people that Mouna Apperson
13 pressured you to have sex with them at least twice
14 a day and put you through hell if you refused
15 them?

16 A. So -- yes, I -- I did tell people that
17 he -- he wanted sex twice a day; he was really
18 upset when he didn't get it.

19 Q. And why did you -- why did you tell
20 people this?

21 A. Because it's the truth.

22 Q. Do you talk to people about your
23 personal sexual relations with your husband now
24 because it's the truth?

25 A. No.

1 Q. Did you tell anyone that Mouna Apperson
2 used an Order of Protection to try to silence you?

3 A. Yes.

4 Q. Why?

5 A. Because it says on there itself "I won't
6 speak to anyone I know," and that's what I believe
7 to be true.

8 Q. And it's your contention that Mouna
9 Apperson had no basis to seek to have you-all stop
10 telling everybody about potentially damaging
11 things to their reputation?

12 A. What I said was the truth, so I don't
13 think there's any reason to tell me that I -- I
14 can't share the truth of what I experienced.

15 Q. All right. So you -- you believe -- do
16 you believe -- or, rather, do you contend that
17 it's appropriate for anyone that has an experience
18 like yours -- or rather perceives an experience
19 like yours to make statements publicly about
20 those?

21 A. Well, I just want to clarify that I
22 didn't make public statements, but if somebody has
23 been abused or raped by someone and -- then I
24 would say, sure, I mean, you're allowed to tell
25 the truth, as far as I'm aware.

1 Q. Is it fair to say that another -- the
2 individual who might be accused of that should
3 have the ability or right as well to defend
4 against claims such as that?

5 A. I suppose so if you think -- if they're
6 saying -- if they feel that they didn't do that,
7 then they would defend themselves.

8 Q. And that would be okay, right?

9 A. If they're being honest.

10 Q. How is it that you can tell, with other
11 people that you don't know and that you didn't
12 experience what they experienced, whether
13 anybody's telling the truth?

14 A. If you don't know them, it's really --
15 it's really hard to know who's telling the truth.

16 Q. But you can't, essentially, you cannot
17 tell yourself, right? I mean, if somebody else
18 makes a post about somebody else, there's no way
19 for you to know the truth unless you experienced
20 it with them side by side.

21 A. Yeah, I guess. How would you know?

22 Q. Is it -- did you presume, because you
23 have perceived the experience the way you have,
24 that anyone else -- anyone else at all -- that
25 were to make any kind of a statement saying

1 something similar about the same person, that that
2 would automatically be true?

3 A. Um, I'm more inclined to believe someone
4 who says they've had a experience similar to mine
5 because that's my experience. So if they have the
6 same -- saying the same thing happened to them, it
7 makes sense to me because why would I be the only
8 one.

9 Q. Why couldn't you be the only one?

10 A. Because I think it's a pattern of
11 behavior how you treat people. I don't think I
12 would be singularly targeted to be the only person
13 to have been treated that way.

14 Q. Why couldn't you be?

15 A. I could. I suppose I could. I don't
16 see why.

17 Q. Well, is it -- is it unusual -- let me
18 strike that.

19 Did it -- does it occur to you at all
20 that there's something unusual about somebody that
21 a bunch of folks are claiming is raping them;
22 however, there's no police intervention, there's
23 no prosecution, there's no criminal convictions?

24 A. I would say that most victims don't file
25 reports, as far as I'm aware. I mean, I don't

1 know. I can't claim to know everybody, but I
2 think that it's less common for people to file a
3 report than it is for them to file one.

4 Q. So, I mean, even so, essentially, you're
5 part of advocating for a crowd justice, right,
6 circumvent the judicial system of the United
7 States? Is that fair to say?

8 MR. BUTTERFIELD: Object to form and
9 foundation of the question. You may answer if you
10 can, Adriane.

11 A. No, I'm definitely not advocating for
12 crowd justice or anything like that or trying to
13 circumvent a judicial system.

14 Q. Well, I mean, I'm going to give you a
15 very ridiculous hypothetical, but you're familiar
16 with the Salem witch trials in our history of our
17 country?

18 A. Very vaguely.

19 Q. All right. Are you aware that there
20 were numerous folks up there in the northeast that
21 were executed because people circumvented the
22 justice system and presumed they had done
23 something illegal?

24 A. Yes.

25 Q. Would that -- what -- what if that was a

1 result for Mr. Apperson?

2 MS. KELLERMAN: Excuse me. I, just for
3 the record, I'd object to the -- I don't even know
4 what to call that -- illegal hypothetical given
5 the fact that there was actually a judicial system
6 that ordered those executions, but regardless.

7 MR. KERSHMAN: All right.

8 MR. BUTTERFIELD: I'll join in the
9 objection because I like the objection.

10 MR. KERSHMAN: Is that your objection?

11 MS. KELLERMAN: That was literally a
12 judge that ordered the executions, but, okay.

13 MR. BUTTERFIELD: I need to brush up on
14 my history.

15 MS. KELLERMAN: Sorry, I was just in
16 Salem around -- for Halloween, or before
17 Halloween.

18 Q. But, essentially, if you're advocating
19 for the -- our justice system as -- and,
20 generally, so would you agree that the premise of
21 being innocent until proven guilty is consistent
22 with the American legal system?

23 A. Yes, according to the legal system, you
24 are supposed to be innocent until proven guilty.

25 Q. But you're saying you don't advocate

1 that that's appropriate at all times?

2 A. I do --

3 MR. BUTTERFIELD: I'll object. It
4 mischaracterizes her prior testimony. Go ahead,
5 Adriane.

6 A. I do think that the legal system is
7 appropriate, that you should be innocent until
8 founded guilty.

9 Q. But here you took part in a group of
10 individuals that all claim that Mouna has done
11 horrific things on a grand scale, is that fair to
12 say?

13 A. As far as I took part, I made one
14 Facebook post with the hashtag Occupy Radix.
15 That's it.

16 Q. So, with that said, do you find it
17 inappropriate that many folks have made multiple
18 assertions publicly, that have made multiple
19 contacts with different people about what they
20 claim Mouna Apperson had done to them?

21 A. You're -- can you repeat the question?
22 I'm sorry.

23 Q. It's okay. We can move on.

24 Have you ever asked others for
25 assistance in vindicating yourself with respect to

1 the accusations?

2 A. No.

3 Q. Did you tell anyone that Mouna Apperson
4 tried to control you?

5 A. I -- I think -- maybe not in those exact
6 words, but, yes.

7 Q. And why?

8 A. Like I'm -- because I felt like that's
9 what -- that's what happened in our relationship.

10 Q. Did you tell anyone that Mouna Apperson
11 -- well, sorry, I already said that one. I
12 apologize.

13 Did you tell people that you wanted to
14 shoot Mouna Apperson in the head with a gun?

15 A. No.

16 Q. Did you talk about chopping Mouna
17 Apperson's head off and showing it in the streets?

18 A. There was a text that I sent to Mouna
19 that had something relating to that in it.

20 Q. What was the context of that?

21 A. The context was I was referencing a
22 Turkish woman who had been -- it was in the news,
23 and she had been abused, raped specifically, and
24 she had cut off her abuser's head and dragged it
25 into the public square for regaining her honor.

1 Q. And this is something that you told to
2 Mouna that you wanted to do to them?

3 A. I did not say I wanted to do that, no.

4 Q. Can you see how that might be scary to
5 somebody who was on the receiving end of something
6 like that?

7 A. Yes.

8 Q. Did you talk about coming to Mouna
9 Apperson's house without their consent?

10 A. No.

11 Q. Did you talk to anyone about refusing to
12 give back your key to Mouna Apperson's home?

13 A. No.

14 Q. Was Natasha Kaminsky working on your
15 behalf?

16 MR. BUTTERFIELD: Object.

17 A. She was --

18 MR. BUTTERFIELD: Form. Go ahead.

19 A. She was -- she was aware -- I mean, she
20 was aware of what I had said about what had
21 happened with -- in my relationship with Nick.
22 So, um, I think a -- I think -- I can't -- I can't
23 speculate, um, but, um, so I guess I'll say I
24 don't know.

25 Q. Do you have a Facebook account?

1 A. I did.

2 Q. You no longer have the Facebook account?

3 A. Correct.

4 Q. Why do you not have a Facebook account?

5 A. I -- I deleted my account back in I want
6 to say around December of 2017, and it was because
7 I was -- it was too much.

8 Like the Occupy Radix movement,
9 everything with Nick, it was bringing back too
10 many memories that I didn't want to have, and it
11 was stressful, so I got rid of it on my -- my
12 Facebook so nobody could contact me.

13 Q. I want to refer you now to Exhibit 53.
14 This appears to be a screenshot of Facebook posts
15 or comments that you've made.

16 Do you see where you wrote on 12/19 of
17 2017? It's a -- let's see, one, two, three --
18 it's about the fourth one down. Okay. She's got
19 it. Can you read that?

20 A. Yeah, I see it.

21 Q. Can you read that?

22 A. Yeah. It says, "Tasha has been working
23 patiently for months, quietly asking for support,
24 very polite, careful in everything she's done.

25 There's a better way to do this. I

1 truly don't know how that would happen. It's a
2 simple ask and she's not hurting anyone. It would
3 be really nice to listen to her and talk with her.
4 She's been working on my behalf as well as many
5 other women."

6 Q. And is this in relation to your
7 allegations against Mouna Apperson?

8 A. I don't -- I don't remember. I mean,
9 can you tell -- can you show me what the post --
10 original post was?

11 Q. If you don't recall, then that's your
12 testimony. I'm not -- I'm not trying to trick
13 you. If you don't recognize it, it doesn't ring a
14 bell, or you don't remember.

15 A. I mean, this -- this is my comment here.
16 Let me -- so, can you ask me the question one more
17 time?

18 Q. What you are referring to here, is that
19 relating to Mouna Apperson?

20 A. So most likely, yes.

21 Q. I'm going to refer you now to Exhibit 8
22 and page 25. Do you see the -- what Tasha is
23 saying? Well, let's start at the end of 24,
24 right?

25 You there -- up there you -- on the end

1 of 24 it says, "Nick -- Tasha's telling Nick has
2 been banned from Food Spark," and then after that
3 -- excuse me -- it says, "Thanks, Tasha."

4 Do you recognize that at all as being a
5 message that you were involved in?

6 A. Yeah, that -- that could have been me
7 saying that.

8 Q. Okay.

9 A. It doesn't have my name on it. That's
10 kind of weird.

11 Q. Well, if we look above it, then let's go
12 back to the last page, the previous page. Sorry
13 about my voice is gone.

14 MR. BUTTERFIELD: It's okay. You need a
15 sec?

16 Q. Okay. That -- do you see all the
17 redacted pages there?

18 A. I see that.

19 Q. And we could -- I mean, we could go back
20 to 22. Well, let's see, 20 -- 23's all redacted,
21 mostly redacted. 22's redacted.

22 Is it possible that your messages are in
23 those redacted sections?

24 A. That's a possibility.

25 Q. And on page 23 at the bottom where it

1 reads "I didn't get far before Nick issued a
2 restraining order asking me not to talk to anybody
3 that knows him."

4 A. Yeah.

5 Q. Do you recognize that as being your
6 message?

7 A. Yeah, that was -- that had to have been
8 me, yeah.

9 Q. One moment, sorry. All right. On page
10 20, let's go to page 20, please. All the way at
11 the bottom. It says, "I'm not" -- do you see what
12 that reads? You can read that. "I'm not sure if
13 Roya" --

14 A. What? I'm sorry, yes, I can read that.
15 It says, "I'm not sure if Roya Massoudnia, who
16 works for Cori, spoke with Cori Bush about me or
17 not, but the response Roya gave me was that Nick
18 had too much influence and money so they couldn't
19 do anything about it."

20 Q. And then above there, before Tasha's
21 comment there, it says, "Because I asked Roya to
22 try to get Nick out of Cori's campaign," is that
23 something from you?

24 A. Yes.

25 Q. What -- tell me about your conversations

1 with Roya.

2 A. I mean, I didn't have a ton of
3 conversations with her, but I basically explained
4 with her, you know, what had happened in my
5 relationship with Nick and -- and so I didn't
6 think like he should be a part of Cori's campaign.

7 So I told Roya about it, you know, to
8 warn Cori, but as far as I know, she didn't think
9 like that was possible.

10 Q. Why did you speak to Roya to get Nick
11 out of Cori's campaign?

12 A. Well, Roya was a friend and basically I
13 didn't think Nick was -- was a safe person, and
14 Cori was somebody -- she -- I don't remember what
15 she was running -- running for, but basically she
16 was an activist, so she was somebody that was
17 standing up for women's rights and things like
18 that, and so I just didn't think that -- that
19 Nick, really, that they would want like, if they
20 knew what Nick had done, that they would want Nick
21 working there.

22 Q. Well, what was your understanding of
23 Nick's -- Nick -- Nick, Mouna's, involvement, with
24 the campaign?

25 A. I don't know exactly all what Nick was

1 doing with the campaign. I know -- I believed he
2 gave money --

3 Q. Did you know anything --

4 A. Yeah.

5 Q. I'm sorry, I interrupted you. You said
6 you know what?

7 A. I said I believe he gave them money, but
8 I don't know what else.

9 Q. All right. I'm going to ask you to
10 presume that's all Nick did was give them money.
11 And when you say "give them money," you're
12 referring to a campaign contribution, correct?

13 A. Yes. Mm-hmm, excuse me.

14 Q. So what are you -- what are you asking
15 the campaign to do with respect to a campaign
16 contribution that might have been provided by
17 Mouna Apperson?

18 A. Return it.

19 Q. Why?

20 A. Because you don't want to accept money
21 from people who are problematic or doing things
22 that you don't agree with.

23 Q. Do you have any idea whether that
24 campaign had any system in place to conduct any
25 type of due diligence on anyone that would provide

1 it, its campaign, any kind of a contribution?

2 A. I have no idea.

3 Q. Do you think it's inappropriate for the
4 political campaign and a politician to receive a
5 contribution from an individual that -- such as
6 what you believe Apperson did?

7 A. Sorry, that question, so do I believe
8 it's appropriate for a campaign to receive a
9 donation from somebody who has been emotionally
10 abusive and has raped women? I would say no.

11 Q. So did you -- this particular campaign,
12 Cori Bush's campaign, did you support that
13 campaign, that politician? Did you believe in the
14 things that that person was advocating?

15 A. Up to -- I don't -- I don't remember
16 everything that they were advocating for, but in
17 general I did support the campaign, but I don't
18 remember everything that they advocated for.

19 Q. Why would it matter to you what money
20 they had to support their campaign?

21 A. That doesn't matter to me. That's not
22 my concern.

23 Q. You just said it was. You just said
24 they shouldn't take the money.

25 A. Well, I was saying that in response to

1 your question of is it appropriate to take money
2 from somebody.

3 Like if it were my campaign and I
4 believed that somebody was donating to me, for
5 example, and I believed this person wasn't --
6 wasn't treating women well, then I would decline
7 the money in solidarity with, you know, the women
8 who had been victimized.

9 Q. And I may have asked you this or you may
10 have answered in a different manner. Do you
11 believe that the politician is inappropriately
12 influenced or under-influenced by anyone that
13 makes a campaign contribution to them?

14 A. So I think politicians can be influenced
15 by money. Was that the question?

16 Q. Not exactly, but let me -- let me go
17 with that. You think that. Why do you think
18 that?

19 A. I think, for example, lobbyists, you
20 know, they pay politicians to support their
21 causes.

22 Q. So some -- Mouna Apperson making a
23 campaign contribution as a regular person, is it
24 your testimony that they are then asserting
25 influence over this politician?

1 A. I don't -- I don't know what kind of
2 influence they had over -- over the politician, if
3 any.

4 Q. Let's take a look at page 4 of this
5 exhibit, same exhibit. On here there's "Speaker
6 Redacted," and do you see up there it says, "I was
7 told by someone who has power in her campaign that
8 Nick's money was more important than my life and
9 body, so it's hard for me to hear that Cori didn't
10 know and she's upset. She looked the other way to
11 line her pockets."

12 This was your statement, is that
13 correct?

14 A. Yes. I didn't -- I didn't remember
15 that, but, yes, that looks like that's me.

16 Q. Okay. So the next line there, that's
17 also your statement, correct?

18 MR. BUTTERFIELD: Which line? I'm
19 sorry, John. "So it's hard for me" --

20 MR. KERSHMAN: The very next one
21 starting "I'm 80 percent sure."

22 Q. That's your statement?

23 A. Yes. Yeah, I'm sorry, I was just
24 reading it, but, yes.

25 Q. So after trying -- and you're trying to

1 get Nick out of the campaign, to the extent you've
2 already testified -- and you're saying here that
3 they told you that Nick, Mouna Apperson, "had too
4 much money and influence to kick out."

5 A. Yeah, that's what it -- that's, yeah,
6 that's what it says.

7 Q. As you're sitting here today, is that
8 really what someone said to you?

9 A. Not -- maybe not those exact words, but
10 -- but the general gist, yes.

11 Q. Okay. But, nevertheless, you have a
12 statement there that has exact words in it, right?

13 A. Yes.

14 Q. So if someone else, say this person you
15 spoke to in the campaign, if I were to show that
16 to them, do you think they might be upset that
17 that was how you recall the conversation you had
18 with them?

19 MR. BUTTERFIELD: Objection. Calls for
20 speculation, foundation, form. Go ahead, Adriane.

21 A. I don't know. I don't know how she
22 would feel about that.

23 Q. Do you know anyone else at all that is
24 of any position of authority in any type of
25 organization that has stated those precise words

1 to you?

2 A. That exact words that Nick "has too much
3 influence and money to kick out"? No, I don't --
4 I don't remember if they -- what her exact words
5 were.

6 So, I mean, people in politics tend to
7 say things in a more subtle way. So I don't
8 remember exactly how she told it to me, but that
9 was the -- that was the gist that I got.

10 Q. And, again, that's just your
11 interpretation of it?

12 A. Right.

13 Q. Is it fair to say, if I were to ask this
14 person under oath, that that's not going to be
15 what they communicate to me?

16 MR. BUTTERFIELD: Objection. Form,
17 foundation. Go ahead, Adriane.

18 A. There's no way for me to know what --
19 what she would tell you.

20 Q. All right. Let's take a look at Exhibit
21 10, please. I just got it open myself. Sorry.
22 Okay. And give me a moment here while I find what
23 I think is the page.

24 Let's go to page 101, please, and so
25 here at the bottom Tasha is -- at the very bottom

1 there you can see Tasha Kaminsky's already running
2 with your statement.

3 And on the next page there it says --
4 the next page being 102. At the top there you
5 said, "Adriane is adamant she told Roya back in
6 April."

7 Now look at Natasha's statement from
8 10:52, at 10:52 a.m. So before that she said,
9 "Adriane told someone high in the campaign.
10 Instead, it became an intense debacle, and I have
11 no trust for her to actually handle this. I have
12 empathy and I don't want to cause her pain, but I
13 have very little trust. People in her campaign
14 knew."

15 Is Defendant Kaminsky's statement here
16 true?

17 MR. BUTTERFIELD: Objection. Form,
18 foundation.

19 A. Um, so which statement -- because you
20 have two highlighted there. What -- or three --
21 four statements. What statement are we
22 referencing?

23 Q. The one from 10:52.

24 A. So all of those are at 10:52. There's
25 like five sentences.

1 Q. Okay. Yeah, my bad. Okay. The -- we
2 already know you told someone. I mean, well, she
3 says "high in the campaign."

4 The person you spoke -- you spoke to
5 Roya?

6 A. Roya, right.

7 Q. And I don't want to get your previous
8 testimony wrong, but was it that you weren't --
9 you weren't sure what their role was or -- I'll
10 let you answer that. What was Roya's role?

11 A. To be honest, I don't remember what her
12 role was.

13 Q. Do you -- can you say that they were
14 high in the campaign?

15 A. I felt -- I felt that she had a close
16 working relationship with Cori Bush, but I don't
17 know what -- how high that was or what that means
18 like exactly.

19 Q. All right. I'm going to bounce around a
20 little bit. I'm going to take you to Exhibit 44.
21 This is a bunch of messages from Roya, and bear
22 with me a moment while I get my own exhibit here.
23 Okay. Let's take a look at 44, please.

24 THE VIDEOGRAPHER: You mean page 44 of
25 Exhibit 44 or Exhibit --

1 MR. KERSHMAN: I'm sorry. Page 40 of
2 Exhibit 44. It just so happens to be 44 pages
3 total of Exhibit 44.

4 MR. BUTTERFIELD: That's not confusing.

5 MR. KERSHMAN: Yeah.

6 MR. BUTTERFIELD: Or like the 10:52 p.m.

7 MR. KERSHMAN: Yeah.

8 Q. So let's take a look at the second to
9 last message there from Roya. There Roya says
10 "And she was very angry."

11 Tasha says, "'She' being Adriane?"

12 The next page there, let's look. It
13 says, "I'm not sure, I think she wanted to expose
14 him or something."

15 And I'm just going to give you a little
16 background on this. Okay. Now, back up to the
17 previous page, on 40. It's the -- I believe it's
18 the second nonredacted message down where it says,
19 "She was actually upset at me that I didn't do
20 something as far as ruining his reputation but I
21 just wasn't comfortable with that."

22 Does it appear to you, with the
23 conversations that I showed you, that "she" that
24 Roya is referring to is you?

25 A. Yes.

1 Q. Were you angry that people you told
2 about your allegations did not do anything about
3 it?

4 A. Um, I, mm-hmm, I mean, it's frustrating
5 to not be like -- if -- if somebody's basically
6 like, "Oh, no, you know, I'm not sure, or I don't
7 -- I don't believe you or I don't care." So, I
8 mean, you can say that I was upset.

9 Q. And is that something Roya said to you:
10 "I don't believe you or I don't care"?

11 A. No, actually she didn't -- she didn't
12 say any -- she didn't say that.

13 Q. But that's how you -- is it fair to say
14 that's how you interpreted it at the time?

15 A. I -- I -- I wasn't sure. I wasn't sure
16 what she -- what she was thinking or feeling about
17 it.

18 Q. What were you -- why were you angry at
19 her?

20 A. So, I mean, I wanted support basically.
21 I -- what I would have liked, since I thought she
22 was a friend, is I would have liked, when I shared
23 what happened, for her to be, "Oh, my gosh, I'm so
24 sorry," and, you know, like, "Of course, I'll be
25 there for you, like whatever you need," and I felt

1 like I was met with maybe a little bit of
2 skepticism instead, which I thought -- I didn't
3 think I would get that.

4 Q. All right. Moving on, did you tell
5 anyone that Mouna Apperson gave you Stockholm
6 Syndrome?

7 A. I believe I told Mouna that. I don't --
8 I don't know if I told anyone else that.

9 Q. Did you reach out to Julie S-e-t-e-l-e?

10 A. Yes.

11 Q. That's when you were served with an
12 Order of Protection against you by Mouna Apperson?

13 A. Yes.

14 Q. And why did you reach out?

15 A. Because I was scared. I needed support.
16 Julie was a friend.

17 Q. What -- well, first off, is Mouna
18 Apperson the person who introduced you to Julie?

19 A. Yes.

20 Q. Who is Julie?

21 A. Julie is a woman who lives in St. Louis.
22 She's -- I believe she's a professor. She met
23 Nick on a dating website actually, but then he
24 told me that he thought she would be a good friend
25 for me, and he encouraged me to make friends with

1 her, and I did.

2 Q. And so after you were served with this
3 Order of Protection, you reached out to her, and
4 for what purpose?

5 A. For support.

6 Q. Support in what way?

7 A. Emotionally, as well as what do I do?
8 I've never had any kind of experience like this,
9 and I didn't know what to do.

10 Q. Is Julie a lawyer?

11 A. She's not.

12 Q. So you were served with court documents,
13 correct?

14 A. Mm-hmm.

15 Q. And the first thing that didn't occur to
16 you about what to do is to contact an attorney?

17 A. I've never been served with -- with
18 anything before. I didn't -- I didn't have --
19 I've never had an attorney before, so I just
20 reached out to my friend.

21 Q. At this time are you undergoing any type
22 of therapy?

23 A. I am not.

24 Q. Have you undergone therapy for the
25 issues that you allege came out of your

1 experiences with Mouna Apperson?

2 A. Yes.

3 Q. And when did you do that?

4 MR. BUTTERFIELD: I'm going to object to
5 this line of inquiry. This calls for confidential
6 medical information of a party who has not placed
7 his or her mental or physical matters in
8 controversy in this case, and it's pretty
9 clear-cut.

10 I believe that this stuff is not
11 discoverable. So I'm going to direct Adriane not
12 to answer questions relating to any treatment that
13 she's had or any injuries or conditions.

14 But -- oh, go ahead.

15 MR. KERSHMAN: I'll just -- I'm going to
16 certify this question.

17 MR. BUTTERFIELD: Okay.

18 Q. Let me ask you this. You reached out,
19 in the relatively -- well, I guess it probably
20 feels like a long time, but I'll tell you -- I'll
21 say it's a relatively short time that I've been
22 talking to you -- that you've reached out to a lot
23 of people for support relating to your experiences
24 with Mouna Apperson, is that fair to say?

25 A. Sure.

1 Q. At what point in time did you reach out
2 for support from a professional, a mental health
3 professional?

4 THE WITNESS: Am I supposed to still
5 answer this? I'm not sure because of the
6 objection.

7 MR. BUTTERFIELD: Yeah, I --

8 THE WITNESS: You had told me not to
9 answer certain --

10 Q. Well, let's -- I'll clarify. I'm not
11 asking at all about who you -- who you treated
12 with. I'm just asking --

13 A. Okay.

14 Q. -- when you first treated.

15 MR. BUTTERFIELD: I think this is a fair
16 question.

17 THE WITNESS: Okay.

18 MR. BUTTERFIELD: If you feel
19 comfortable answering it.

20 THE WITNESS: Okay. That's fine. I
21 just wanted to make sure I'm doing what I'm
22 supposed to do.

23 MR. BUTTERFIELD: Uh-huh.

24 A. So at what point -- what point I reached
25 out? I -- while I was dating Nick, I had a

1 therapist that I was speaking with and continued
2 to speak with after I left Nick.

3 Q. The therapist that you were speaking
4 with while you were with Nick, was that related to
5 your relationship with Nick?

6 MR. BUTTERFIELD: Objection. I'm going
7 to -- I'm going to direct Adriane not to answer
8 because this calls for privileged, you know,
9 physician/patient/counselor/therapist/patient
10 privileged information and communications.

11 So, Adriane, I'm going to direct you not
12 to answer this question.

13 Sorry, John.

14 MR. KERSHMAN: No worries. I know
15 you're doing your job. I'll certify that
16 question.

17 Q. Adriane, was a group convened to help
18 you related to the Order of Protection?

19 A. There were some mediators that were
20 helping me with that.

21 Q. If you can, help me understand what
22 you're referring to. Not only what you mean by
23 mediators but what this group was doing for you.

24 A. So there were, I believe, two people who
25 I didn't know before this. I believe I met them

1 through Justine or through Julie, but they were
2 basically talking to Nick and asking like, "Hey,
3 what do you want? Like how can we resolve this
4 without bringing Adriane to court?"

5 And so they were basically trying to get
6 this issue like resolved without it having to go
7 to court.

8 Q. Let me ask you this. Was Julie, Justine
9 Collum, Veronica Darlene, Ashley Johns, Niles Z.,
10 were those all part of that group?

11 A. I don't -- I don't recall ever speaking
12 with the Ashley Johns or a Niles Z. I don't know
13 if they ever spoke with Nick. Julie, yes. And
14 who's the other person? Julie S., and I think
15 there was some -- one other person you mentioned.

16 Q. Veronica Darlene.

17 A. Yes. Yes, I spoke with her.

18 Q. And who among them is specifically a
19 mediator?

20 A. As far as I remember, I believe a
21 mediator was -- there was two people that I
22 remember, but I think it was Veronica Darlene.

23 Q. What was your understanding about what
24 type of mediator they were?

25 A. My understanding was that they were

1 going to find out, you know, what -- what Nick
2 wanted and basically --

3 Q. Yeah, I'm sorry to interrupt you.

4 A. Yeah.

5 Q. When you say "mediator," and it's --

6 A. Yeah.

7 Q. I want to kind of get an idea of what
8 your understanding of that is. So when I hear
9 "mediator," for example -- for example, I'm a
10 mediator, maybe some of these other attorneys are
11 mediators.

12 It requires a continuing education,
13 ongoing education, to maintain the designation in
14 order to practice mediation. It doesn't mean you
15 have to be an attorney, but there are
16 qualifications associated with it in order to call
17 yourself a mediator.

18 Do you know whether or not that
19 designation, in the way that I described, was
20 associated with any of the people that you
21 described?

22 A. I don't know for sure if they -- if they
23 have that qualification or not.

24 Q. And I'm not -- and by all means, I'm not
25 saying you did anything wrong. Alternative

1 dispute resolution is -- is a perfectly noble way
2 to go.

3 A. Okay.

4 Q. What did you tell that group regarding
5 Mouna Apperson?

6 MR. BUTTERFIELD: I'll just object to
7 the form of the question, "the group," but go
8 ahead.

9 A. So I described my relationship with
10 Mouna Apperson, including sexual and emotional
11 abuse.

12 Q. Did you claim that Mouna was trying to
13 silence you for speaking up about rape with this
14 Order of Protection?

15 A. I -- that is how I felt, so I may have
16 said that.

17 Q. Do you recall if they provided any type
18 of response to that statement to you?

19 A. So I don't -- I don't -- I don't
20 remember.

21 Q. Did you let that group know that you had
22 refused to give back your house key to Mouna's
23 house?

24 A. I don't remember if that question was
25 asked or -- or not.

1 Q. Just bear with me on this. Why would
2 anyone have a reason to ask you something that
3 they, like that, that they could not have known?

4 A. Maybe if, since they were speaking with
5 Nick as well, if Nick had brought it up to them.
6 Maybe they would have known --

7 Q. Okay. So the question is --

8 A. -- and I don't know if they knew.

9 Q. So you didn't -- you did not proactively
10 tell them that in advance of talking to Nick,
11 Mouna, is that correct?

12 A. I don't -- I don't remember that. So,
13 yeah, I mean, I don't think I would have just
14 said, "Hey, you know, I didn't give back a key to
15 Nick's house." I don't remember.

16 Q. Have you ever reached out to any of
17 Mouna Apperson's employers?

18 A. I have not.

19 Q. Have you reached out to any other
20 associations apart from -- we discussed this
21 politician.

22 Did you reach out to any other
23 associations or -- whether it's political
24 affiliations, charitable organizations, that Mouna
25 was associated with?

1 A. No.

2 Q. So I just want to make sure I understand
3 a couple other things real, real quick here and
4 we'll move on.

5 That you believe Mouna Apperson raped
6 you during your relationship, correct?

7 A. Yes.

8 Q. And did you contact -- ever contact the
9 police when that allegedly occurred?

10 A. No, I did not.

11 Q. Did you ever go to the hospital?

12 A. I did not.

13 Q. Did you ask anyone for help?

14 A. Um, I guess --

15 Q. Sorry, did you ask anyone for help
16 during your relationship at around those -- the
17 time that you allege you were raped by Mouna?

18 A. I -- I'm not supposed to talk about my
19 medical, um, so I'm not sure how to answer that.

20 MR. BUTTERFIELD: Therapist?

21 THE WITNESS: Right.

22 MR. BUTTERFIELD: John, if you want to
23 reask that question, I think it's fair for her to
24 answer if you want to make a clear record of that
25 rather than me saying that. It's up to you.

1 Q. All right. During your -- during the
2 time of your relationship, had you reached out to
3 a -- to your therapist at the time about the
4 allegations you had of rape by Mouna during that
5 relationship?

6 A. Yes.

7 Q. And just confirming, you at no time
8 after that reached out to the police?

9 A. Right.

10 Q. Then, despite those allegations, you
11 told Mouna that you wanted to resume your
12 relationship after it ended things, correct?

13 A. I don't remember what exactly I told
14 him, but I may have said something along those
15 lines.

16 Q. Adriane, are you aware that there's a
17 recording of a conversation between Mouna and some
18 other people concerning the allegations against
19 them? "Them" being Mouna.

20 A. I am aware.

21 Q. Okay. Do you know when was that
22 recording taken?

23 A. I don't know.

24 Q. How did you become aware?

25 A. I was told about it after the fact.

1 Q. After the fact? When after the fact?

2 A. I was told about it I believe in --
3 sometime around maybe -- I think they told me
4 around November or December.

5 Q. Of when?

6 A. Of 2017.

7 Q. So do you know -- do you know who made
8 the recording?

9 A. I do not know.

10 Q. Do you know what was the purpose of the
11 conversation?

12 A. From what I was told, it looks -- it
13 seems like they were asking Nick to admit that --
14 that he had abused Tasha and myself.

15 Q. And why was there a need to record that
16 conversation, to the extent you're aware?

17 A. I don't know that.

18 Q. Are you in possession of a copy of that
19 recording?

20 A. I'm not.

21 Q. Do you know if Mouna was aware that they
22 were being recorded?

23 A. I don't know that.

24 Q. Have you ever been in possession of a
25 nude video of Mouna?

1 A. I have.

2 Q. Are you currently in possession of such
3 video or videos?

4 A. No.

5 Q. Have you ever sent nude videos of Mouna
6 to anyone?

7 A. I did.

8 Q. And who did you send them to?

9 MR. BUTTERFIELD: I'm just going to
10 object to the form of the plural of the videos. I
11 think they're -- subject to that, Adriane, you may
12 answer.

13 THE WITNESS: Okay.

14 A. So, um --

15 Q. Well, let me back up. I'll rephrase it.

16 Have you ever sent at least one nude
17 video of Mouna to someone?

18 A. Yes, there was only one.

19 Q. Okay.

20 A. Um -- go ahead.

21 Q. And who did you send that video to?

22 A. I sent it to Mouna, as well as my
23 cousin, Elika, and one of my friends named Diana.

24 Q. Why did you share those videos?

25 A. It was only the one video.

1 MR. BUTTERFIELD: Objection. Form.

2 MR. KERSHMAN: Sorry, sorry. That's my
3 bad.

4 Q. Why did you send that, that one video?

5 MR. BUTTERFIELD: Yeah.

6 A. So I sent it at the time because I
7 thought it was cute.

8 Q. Did you obtain consent from Mouna before
9 sending that video to these people?

10 A. I did not ask Mouna before I sent it.

11 Q. And why did you not obtain consent?

12 A. I didn't think to. I didn't think to
13 ask.

14 Q. Was Mouna aware that you were sharing
15 these videos prior to you doing so?

16 MR. BUTTERFIELD: Objection. Form.
17 Video.

18 Q. Video. Again, my bad. I'll rephrase
19 that.

20 Was Mouna aware that you were sharing
21 that video prior to you doing so?

22 A. Oh, Mouna was aware right after because
23 I took the video, sent it, and then I -- I told
24 him right after. So, but, no, not -- not before.

25 Q. I have a hypothetical for you. If Mouna

1 had a video of you nude and shared it with someone
2 without your prior consent, what -- how would you
3 react to something like that?

4 A. Um, I don't -- I think I'd be upset.

5 Q. As we sit here today, is it fair to say
6 that you understand that that is wrong to do
7 something like that?

8 MR. BUTTERFIELD: Objection. Form,
9 foundation.

10 A. What I would say is that I had -- I had
11 no ill intent in doing that, and I didn't think he
12 would be upset just based on how I -- I knew him
13 and so --

14 Q. Is that because at the time you viewed
15 him as a man and, because it's relating to a man,
16 it's okay to do that?

17 A. I don't think it's because it's a man.
18 I think I thought it was just a cute video. I
19 didn't -- I didn't really think of it as very --
20 like something scandalous or something like that,
21 and so I really -- I didn't think he would be -- I
22 didn't think he would be upset about it, and he
23 never told me that he was.

24 Q. Have you had conversation with any of
25 the other parties to this matter regarding your

1 allegations against Mouna?

2 A. Can you repeat that question?

3 Q. Yes. Have you had any conversations
4 with any other parties to this matter regarding
5 your allegations against Mouna?

6 A. So you're asking if I --

7 MR. BUTTERFIELD: Prior to the lawsuit.

8 THE REPORTER: What did he say?

9 MR. KERSHMAN: He said "Prior to the
10 lawsuit."

11 Q. I'm asking just -- I'm asking a general
12 open, essentially, ever.

13 MR. BUTTERFIELD: Ever.

14 A. Okay. Have I -- have I spoken with any
15 party about this lawsuit, meaning like myself --
16 or obviously not myself, but Tasha or Rodney?

17 Q. I'll ask it again --

18 MR. BUTTERFIELD: I think (inaudible) --

19 MR. KERSHMAN: (Inaudible.)

20 MR. BUTTERFIELD: -- of an accusation.

21 Sorry.

22 THE REPORTER: I didn't hear what -- I
23 didn't hear what you said.

24 MR. KERSHMAN: I'll read -- I'll just do
25 it -- I'll strike all of that. We'll have another

1 question.

2 Q. Okay. We looked at a couple of exhibits
3 here where there's some -- at least some type of
4 messaging with at least Tasha, okay?

5 So I'm asking you a global question
6 whether or not you had conversations with what
7 would be Rodney or Tasha, who are the other
8 parties to this particular matter, and those
9 conversations were regarding your allegations
10 against Mouna.

11 A. So the way that I am interpreting that
12 question is that -- make sure I'm understanding.

13 You're asking me if I spoke with Rodney
14 or Tasha about what I experienced with Nick or
15 what you're calling allegations with Nick, right?

16 Q. Yes.

17 A. Then the answer is yes.

18 Q. Did you ever discuss your goals
19 regarding reaching out to various, whether it's
20 people or organizations or the posts that we have,
21 of these allegations?

22 A. I'm so sorry, I'm not trying to be
23 difficult. Can you repeat that one more time?

24 Q. Yes. Did you ever discuss your goals
25 regarding reaching out to the organizations that

1 you had, making the posts, or whether it's a
2 support Radix House, whether it was reach out to
3 anyone such as the campaign, what your goals were?
4 Did you discuss that with the other defendants?

5 MR. BUTTERFIELD: Object to the form,
6 foundation. Go ahead, Adriane.

7 A. As far as -- well, I hadn't reached out
8 to I guess -- I hadn't reached out to any
9 organizations except if you want to consider Roya
10 the one person. I haven't reached out to any
11 organizations, and then my goals, I guess I never
12 really like sat down and wrote like these are my
13 goals or this is an agenda.

14 I really -- I didn't have -- it wasn't
15 organized. I didn't have anything like that, so I
16 don't -- I don't think I said like, you know, this
17 is what needs to happen or this is what I want or
18 anything like that, but I did discuss my
19 relationship with them.

20 Q. Did Tasha Kaminsky discuss her goals
21 with you?

22 A. I mean, I don't know what -- what goals
23 like -- I don't -- I don't remember that, so I
24 don't remember her saying like, "Oh, these are my
25 goals" or anything like that.

1 I mean, I know that like I believe that
2 ultimately the idea was -- the reason to say
3 something is to prevent other people from being
4 hurt. So, but I don't know what, if any, if there
5 were like specific goals or -- or anything like
6 that.

7 Q. Will you be satisfied if Mouna lost
8 social, professional, or other prestige as a
9 result of the allegations you have made against
10 them?

11 MR. BUTTERFIELD: Objection. Form.

12 A. To be one hundred percent honest, like
13 after December, when I deleted my Facebook, that
14 was to move on with my life because it was -- I
15 was stressed with reliving my past.

16 I don't have anything to Mouna. I don't
17 wish anything. I thought I would move on with my
18 -- with my life and just recover. I didn't think
19 that this would be continuing, and so I don't have
20 anything for Mouna. I only wish to not be in
21 contact.

22 MR. KERSHMAN: All right. I'm going to
23 ask that we take maybe a 15-minute break, and I
24 can assess where I'm going from here and get back
25 to you guys.

1 MR. BUTTERFIELD: Okay.

2 MR. KERSHMAN: How about -- what time is
3 it?

4 MR. BUTTERFIELD: 2:45.

5 MR. KERSHMAN: 2:45. Thank you,
6 Michael.

7 MR. BUTTERFIELD: Okay.

8 THE VIDEOGRAPHER: We are going off the
9 record. The time is 2:30 p.m. Central Standard
10 Time.

11 (Temporary recess was held.)

12 MR. KERSHMAN: I am ready.

13 THE VIDEOGRAPHER: Okay. Stand by. We
14 are back on the record. The time is 2:49 p.m.
15 Central Standard Time.

16 Q. All right. The good news is we're
17 almost done. I just have a couple of wrap-up
18 questions here for you.

19 The first is let's go to the Exhibit 52,
20 and we're going to go all the way to page 482, the
21 top of 482, and the top of 482, April 1st, 2017,
22 18:54:56. Let's take a look there.

23 I mean, the first thing I want to ask
24 you, though, is April 1st, 2017, this is after the
25 time in which you had reported that Mouna had

1 abused you, is that correct?

2 Adriane, can you hear me?

3 THE REPORTER: Can anybody hear us?

4 MR. BUTTERFIELD: I can hear you.

5 MS. KELLERMAN: I can hear you.

6 MR. KERSHMAN: Adriane?

7 THE REPORTER: Is Adriane there? We
8 don't have a picture --

9 THE VIDEOGRAPHER: Yeah, no, Adriane, we
10 can't hear you right now. Did your headphones go
11 off maybe?

12 MS. KELLERMAN: Yeah, I can see her. I
13 just can't hear her.

14 MR. BUTTERFIELD: Same.

15 THE VIDEOGRAPHER: There's not a lot of
16 background noise. You sounded --

17 THE WITNESS: Can you hear me now?

18 THE VIDEOGRAPHER: Yeah.

19 MR. BUTTERFIELD: Yes.

20 MS. KELLERMAN: Yes.

21 MR. KERSHMAN: Yes.

22 THE WITNESS: I'm sorry.

23 MR. BUTTERFIELD: It's okay.

24 Q. Adriane, did you hear the part about me
25 saying we're almost done, a couple more questions?

1 A. I did. I did.

2 Q. Okay. So we're looking at this Exhibit
3 52, the April -- top there, the text, April 1st,
4 2017. The question I had is is that after you
5 have come out with the allegations you've made of
6 abuse to you by Mouna, is that correct?

7 A. Yes.

8 Q. Okay. So right at the top there you say
9 "Do hope we can be friends," right?

10 A. Mm-hmm.

11 Q. A couple of -- couple texts down there,
12 "Can you come over and give me a hug?"

13 A. Mm-hmm, yes.

14 Q. And Mouna's response there is it makes
15 them uncomfortable. They love you, but "I don't
16 think this would be a good idea." And then is
17 that Mouna offering some options of folks that
18 could be present with you-all?

19 A. Yes.

20 Q. But you wanted to meet alone?

21 A. Unfortunately, I did want -- I did want
22 support from Mouna.

23 Q. I'm -- a couple other questions. So,
24 first, did Mouna ever threaten to kill you?

25 A. Mouna told me that -- that he had

1 connections and that he could have someone killed
2 and it would not go back to him.

3 Q. When did Mouna say this to you?

4 A. It's some -- I believe it was earlier on
5 in the relationship. Sometime in 2016.

6 Q. And this was specifically directed to
7 you?

8 A. He -- he told me he had that capability.
9 I don't know exactly what his intent was.

10 Q. So is it fair to say he did not make a
11 statement to you specifically that they could have
12 you killed or that they would have you killed?

13 A. Yeah, he didn't tell me that he would
14 have me killed, but he let me know that he had the
15 capability to have people killed.

16 Q. Did you dispute -- well, sorry, let me
17 take things back.

18 At the beginning of the lawsuit, when it
19 was first filed and we entered, you recall being
20 served with the petition for this lawsuit? Yes?

21 A. Yes.

22 Q. Do you remember disputing being served
23 in this lawsuit?

24 A. I do.

25 Q. And your lawyer filed a motion on your

1 behalf disputing the validity of your service,
2 right?

3 A. Yes.

4 Q. And it subsequently turned out that
5 there was an affidavit and from the individual who
6 served you and that had been dropped, is that
7 correct?

8 A. What? I'm sorry, I didn't understand
9 that.

10 Q. Was the motion that you filed disputing
11 service, was that dropped?

12 A. I don't know. Was it? I don't know.
13 I'm sorry.

14 Q. All right. So you, as you sit here
15 today, are you -- would you say that you have no
16 recollection of you being served?

17 A. No, I was. I was served.

18 Q. But so, I mean, you don't really -- you
19 don't remember? This was just something your
20 lawyers were doing and you don't immediately have
21 a recollection of it?

22 MR. BUTTERFIELD: I don't think that's
23 what she testified. I'll object. Form,
24 foundation.

25 Q. Okay. So just tell me then what your

1 understanding of that entire issue.

2 A. So I believe my lawyers objected to the
3 way that I was served, and then I don't -- I don't
4 know exactly what happened, but I thought that the
5 objection was not accepted and so that's why I was
6 served.

7 Q. All right. And you'd understand that
8 Mouna would have to expend legal fees in dealing
9 with that dispute of whether you were served,
10 correct?

11 A. I've never served people. I have no
12 knowledge of how it works or anything like that.

13 Q. All right. With respect to the motion
14 filed by your attorneys disputing it, Mouna's
15 attorneys would have to respond and that would
16 cost Mouna attorney's fees, just as it cost you
17 attorney's fees, is that fair to say?

18 MR. BUTTERFIELD: I'll object. Form,
19 foundation. Go ahead.

20 A. So I guess I thought you -- you're
21 speaking to me. Like saying it costing me
22 attorney's fees. I -- is that what you were
23 asking me?

24 Q. I'm asking you would you -- you would
25 understand that Mouna would have to spend on his

1 attorneys to deal with this dispute of your
2 service?

3 A. I see. Yeah. So like sitting here
4 right now, I understand that. It's not something
5 that was on my mind at the time. I wasn't
6 thinking, oh, like, you know, Nick's going to have
7 to spend money. I was just not wanting to, you
8 know, hopefully be sued by Nick. That's why we
9 contested the service.

10 MR. BUTTERFIELD: I think the motion to
11 dismiss speaks for itself and in the court record
12 and docket and pleadings, but, you know, go ahead.
13 It's a fair question.

14 A. Did I answer the question?

15 Q. We'll take what you have, and that's --
16 that's good enough.

17 MR. KERSHMAN: I have no more questions.

18 MS. KELLERMAN: I don't have any
19 questions.

20 MR. BUTTERFIELD: I don't have any
21 questions.

22 Adriane, you have the right to read your
23 transcript to make sure that everything's been
24 transcribed correctly.

25 You can't change your testimony, but you

1 can identify what I like to call typographical
2 type of errors, or you can do what we call waive
3 signature, which means you don't need to read it,
4 you trust everything's being taken down accurately
5 and go on.

6 Do you want to read or do you want to
7 waive signature?

8 THE WITNESS: I guess what do you
9 recommend? I guess --

10 MR. BUTTERFIELD: There's no right or
11 wrong here.

12 THE WITNESS: -- most people read it?

13 MR. BUTTERFIELD: Most people waive
14 signature, but it's entirely up to you.

15 THE WITNESS: I guess --

16 THE REPORTER: You'll still get a
17 transcript.

18 MR. BUTTERFIELD: Yeah, you'll get the
19 transcript. I'll send it to you, you'll read it,
20 and then you have to sign something and return it
21 to me if you want to read or, if you waive
22 signature, you don't have to send anything back.

23 You don't have to read it if you don't
24 want to.

25 THE WITNESS: Okay. Then I guess that's

1 fine. That's what a lot of people do, that's
2 fine. I don't need to read it. Yeah.

3 MR. BUTTERFIELD: Okay, yeah, we'll
4 waive.

5 THE VIDEOGRAPHER: This concludes the
6 deposition of Adriane Norman. The time is 3
7 o'clock p.m. Central Standard Time.

8 MR. BUTTERFIELD: I think this is
9 exactly -- are we off the record?

10 MR. KERSHMAN: We're off the record.

11 THE VIDEOGRAPHER: Yes.

12 MS. KELLERMAN: I just want an e-tran,
13 please.

14 THE VIDEOGRAPHER: Teneil, do you want a
15 video as well?

16 MS. KELLERMAN: Not right now. If I do,
17 is it just through Archway?

18 THE VIDEOGRAPHER: Yeah. Correct.

19 MS. KELLERMAN: Okay.

20 THE REPORTER: Michael, do you want a
21 transcript?

22 MR. BUTTERFIELD: Yeah, I'll take an
23 e-transcript, please. I don't need a copy of the
24 video at this time.

25 (Witness excused.)

1 (By agreement of all the parties, the
2 signature of the witness is hereby waived.)

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

S T I P U L A T I O N

1
2
3 IT IS STIPULATED AND AGREED BY ALL
4 PARTIES HERETO THROUGH THEIR RESPECTIVE COUNSEL,
5 AND BY THE WITNESS IN HER OWN BEHALF, THAT
6 SUBMISSION OF THIS DEPOSITION TO THE WITNESS FOR
7 EXAMINATION AND READING AND THAT SIGNING OF THE
8 DEPOSITION BY THE WITNESS, ALL AS PROVIDED IN RULE
9 57.03, MISSOURI RULES OF CIVIL PROCEDURE, ARE
10 HEREBY EXPRESSLY WAIVED, AND THAT THE DEPOSITION
11 MAY BE FILED WITH THE COURT AND BE USED AS FULLY
12 AS THOUGH SIGNED; PROVIDED, HOWEVER, THAT WITHOUT
13 LIMITATION AS TO THE SCOPE AND EFFECT OF THE
14 WAIVER HEREIN MADE, AT ANY TIME BEFORE USE OF THE
15 DEPOSITION AT TRIAL, THE WITNESS MAY, BY APPEARING
16 BEFORE THE OFFICER HAVING TAKEN SAID DEPOSITION,
17 AS AUTHORIZED UNDER RULE 57.03 TO TAKE DEPOSITIONS
18 IN THIS STATE, MAKE ANY CHANGES IN SAME SHE
19 DESIRES, IN THE MANNER, AND WITH THE EFFECT, AS
20 SET OUT IN RULE 57.03(F); AND THAT PROMPT NOTICE
21 BE GIVEN TO ALL PARTIES OF ANY CHANGES SO MADE.
22

23 _____
24 /S/JULIE E. STELFOX,
25 CCR, CSR, RMR, CRR

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

I, JULIE E. STELFOX, MISSOURI CERTIFIED COURT REPORTER, ILLINOIS CERTIFIED SHORTHAND REPORTER, AND NATIONAL COURT REPORTERS ASSOCIATION REGISTERED MERIT REPORTER AND CERTIFIED REALTIME REPORTER, DO CERTIFY THAT PURSUANT TO NOTICE, AND TAKEN VIA ZOOM,

ADRIANE NORMAN,

CAME BEFORE ME, WAS BY ME DULY SWORN TO TESTIFY THE WHOLE TRUTH OF HER KNOWLEDGE OF THE MATTERS IN CONTROVERSY AFORESAID, WAS EXAMINED AND HER EXAMINATION THEN WRITTEN IN STENOTYPY BY ME, AND AFTERWARDS TYPED, SIGNATURE OF THE WITNESS BEING EXPRESSLY WAIVED BY CONSENT OF COUNSEL AND THE WITNESS, AS HEREINBEFORE SET OUT, ON THE DAY IN THAT BEHALF AFORESAID, AND SAID DEPOSITION IS HERewith RETURNED.

I FURTHER CERTIFY THAT I AM NOT COUNSEL, ATTORNEY, OR RELATIVE OF EITHER PARTY, OR CLERK OR STENOGRAPHER OF EITHER PARTY, OR OF THE ATTORNEY OF EITHER PARTY, OR OTHERWISE INTERESTED IN THE EVENT OF THIS SUIT.

GIVEN UNDER MY HAND IN THE COUNTY OF ST. LOUIS, STATE OF MISSOURI, ON THE _____ DAY OF _____, 2022.

/S/JULIE E. STELFOX,
CCR, CSR, RMR, CRR

1 - 1 -

2 1005 [1] 2:4
 15-MINUTE [1] 107:23
 3 1513 [1] 2:17
 18TH [1] 8:21
 4 1989 [1] 8:21
 19SL-CC00805 [3] 1:5; 4:5; 5:8

- 2 -

6 2008 [1] 54:23
 7 2009 [1] 54:23
 2022 [4] 1:12; 4:13; 5:3; 119:19
 8 21ST [1] 56:6
 22'S [1] 76:21
 9 22ND [1] 26:8
 23'S [1] 76:20
 10 23RD [2] 30:19; 37:7
 25TH [1] 42:14

- 3 -

12 314-373-7135 [1] 2:5
 13 314-725-1912 [1] 2:10
 314-863-6311 [1] 2:14

- 6 -

15 618-530-6225 [1] 2:18
 16 62294 [1] 2:17

- A -

18 ABILITY [2] 25:15; 67:3
 ABOVE [3] 64:22; 76:11; 77:20
 19 ABUSE [2] 96:11; 110:6
 ABUSED [6] 27:7; 41:20; 66:23; 72:23; 100:14; 109:1
 20 ABUSER'S [1] 72:24
 ABUSING [1] 29:14
 21 ABUSIVE [3] 12:16; 39:12; 80:10
 ACCEPT [1] 79:20
 22 ACCEPTED [1] 113:5
 ACCORDING [1] 70:23
 23 ACCURATE [8] 21:3, 7; 23:8, 11, 17, 18; 33:2; 35:6
 ACCURATELY [1] 115:4
 24 ACCUSATION [1] 104:20
 ACCUSATIONS [11] 25:13; 40:8, 9, 12, 15, 20, 21; 58:3, 5; 59:4; 72:1
 25

- 1 **ACCUSE** [6] 24:4, 12, 14, 20; 30:6, 13
ACCUSED [1] 67:2
- 2 **ACCUSING** [1] 50:5
ACTIVIST [5] 60:7, 10; 62:17; 64:1; 78:16
- 3 **ACTIVITIES** [1] 16:6
ADAMANT [1] 85:5
- 4 **ADEQUATELY** [1] 50:13
ADMIT [1] 100:13
- 5 **ADRIANE** [41] 1:10; 2:12; 4:9; 5:2, 7, 18, 24; 6:5; 7:19, 20; 20:8;
21:1; 22:22; 32:14; 42:17; 51:18; 57:25; 61:17; 69:10; 71:5;
6 83:20; 84:17; 85:5, 9; 87:11; 91:11; 93:7, 11, 17; 94:4; 99:16;
101:11; 106:6; 109:2, 6, 7, 9, 24; 114:22; 116:6; 119:7
- 7 **ADVANCE** [1] 97:10
ADVOCATE [1] 70:25
- 8 **ADVOCATED** [1] 80:18
ADVOCATING [5] 69:5, 11; 70:18; 80:14, 16
- 9 **AFFECTS** [1] 30:24
AFFIDAVIT [1] 112:5
- 10 **AFFILIATIONS** [1] 97:24
AFTERWARDS [1] 119:11
- 11 **AGENDA** [1] 106:13
AGITATED [1] 51:7
- 12 **AGREED** [3] 11:18; 32:2; 118:2
AHEARN [2] 2:3; 4:13
- 13 **ALLEGATIONS** [13] 41:17; 75:7; 88:2; 99:4, 10, 18; 104:1, 5; 105:9,
15, 21; 107:9; 110:5
- 14 **ALONE** [1] 110:20
ALONG [2] 16:4; 99:14
- 15 **ALREADY** [4] 72:11; 83:2; 85:1; 86:2
ALTERNATIVE [1] 95:25
- 16 **AMERICAN** [1] 70:22
AMONG [1] 94:18
- 17 **AMOUNTS** [1] 64:8
ANGRY [5] 37:23; 38:3; 87:10; 88:1, 18
- 18 **ANYBODY'S** [1] 67:13
ANYMORE [1] 30:22
- 19 **APART** [1] 97:20
APOLOGIZE [11] 15:4; 17:25; 18:6; 29:8; 32:8; 51:6, 10, 15, 16;
20 60:13; 72:12
APPEARANCE [1] 5:14
- 21 **APPEARANCES** [1] 2:1
APPERSON [78] 1:3; 2:20; 4:3, 20, 21; 5:5, 6; 7:21; 11:21; 12:6, 17;
22 13:1, 6, 11; 14:11, 14; 16:5; 21:4; 23:21, 25; 24:4, 12, 20; 25:17;
30:6; 33:3, 14, 24; 34:9; 37:21; 38:15, 19; 39:3, 6, 17, 20; 40:10,
23 16; 41:17, 20, 21, 24; 43:8; 44:19; 46:13; 50:6; 53:13, 16; 58:3;
59:17; 60:12; 61:21, 23; 62:2; 65:12; 66:1, 9; 70:1; 71:20; 72:3,
24 10, 14; 75:7, 19; 79:17; 80:6; 81:22; 83:3; 89:5, 12, 18; 91:1, 24;
96:5, 10; 98:5
- 25 **APPERSON'S** [6] 34:18; 61:19; 72:17; 73:9, 12; 97:17
APPRECIATE [2] 19:2, 9

1 **APRIL** [13] 10:19, 21; 11:2; 31:19; 41:4; 42:14; 43:10; 59:15; 85:6;
108:21, 24; 110:3

2 **ARCHWAY** [3] 2:16; 5:12; 116:17

ARIA [1] 58:8

3 **AROUND** [16] 9:5; 10:7, 18, 19, 20; 11:2, 25; 36:3; 37:5; 42:7;
70:16; 74:6; 86:19; 98:16; 100:3, 4

4 **ASHLEY** [2] 94:9, 12

ASPECT [1] 56:17

5 **ASSAULTED** [1] 41:20

ASSAULTING [1] 24:19

6 **ASSERTING** [1] 81:24

ASSERTIONS [1] 71:18

7 **ASSERTIVE** [1] 18:21

ASSESS [1] 107:24

8 **ASSISTANCE** [1] 71:25

ASSOCIATED [3] 95:16, 20; 97:25

9 **ASSOCIATION** [1] 119:4

ASSOCIATIONS [2] 97:20, 23

10 **ASSUMING** [1] 52:8

ASSUMPTION [1] 65:1

11 **ATT.NET** [1] 1:25

AUDIO [1] 60:13

12 **AUTHORITY** [1] 83:24

AUTHORIZED [1] 118:16

13 **AUTOMATICALLY** [1] 68:2

AVENUE [4] 2:3, 8, 13; 4:14

14

- B -

15

16 **BACKGROUND** [5] 19:13, 16, 25; 87:16; 109:16

BANNED [1] 76:2

BECAME [1] 85:10

17 **BEDROOM** [3] 49:16, 19, 20

BEGIN [1] 11:1

18 **BEGINNING** [3] 33:10; 47:1; 111:18

BEHAVIOR [3] 30:7; 31:14; 68:11

19 **BEHIND** [1] 48:12

BELL [1] 75:14

20 **BELONG** [5] 60:7; 62:13; 63:22, 25; 64:7

BEMISTON [2] 2:3; 4:14

21 **BESIDES** [1] 18:7

BETTER [2] 18:22; 74:25

22 **BETTERING** [1] 64:10

BIFOCAL [2] 41:3; 64:15

23 **BIGGER** [1] 30:4

BIRTH [1] 8:20

24 **BOARDS** [1] 41:15

BOTHER [1] 36:10

25 **BOTTOM** [5] 42:15; 76:25; 77:11; 84:25

BOUNCE [1] 86:19

1 **BOYFRIEND** [1] 55:3
 BREAKUP [4] 27:4; 36:16, 18; 37:21
 2 **BRINKER** [1] 2:12
 BROKEN [3] 30:7; 35:11; 47:18
 3 **BROWN** [3] 5:7; 40:23; 64:16
 BRUSH [1] 70:13
 4 **BUNCH** [2] 68:21; 86:21
 BUSH [4] 59:11, 13; 77:16; 86:16
 5 **BUSH'S** [1] 80:12
 BUTTERFIELD [106] 2:12; 5:17; 6:2; 7:8, 11, 13; 11:5; 12:9, 21;
 6 14:6, 19; 15:19; 16:1, 13, 17, 24; 19:18; 20:8, 11, 22, 25; 21:16;
 22:2, 9; 28:3; 30:9; 31:22; 32:1, 6, 10, 22; 34:2; 35:12; 42:11, 13;
 7 45:13; 50:1, 11, 16, 23; 51:1, 4, 10, 16; 52:3; 55:9; 56:11, 24;
 57:4, 10; 58:21; 60:16, 19; 61:2; 69:8; 70:8, 13; 71:3; 73:16, 18;
 8 76:14; 82:18; 83:19; 84:16; 85:17; 87:4, 6; 91:4, 17; 92:7, 15, 18,
 23; 93:6; 96:6; 98:20, 22; 101:9; 102:1, 5, 16; 103:8; 104:7, 13,
 9 18, 20; 106:5; 107:11; 108:1, 4, 7; 109:4, 14, 19, 23; 112:22;
 10 113:18; 114:10, 20; 115:10, 13, 18; 116:3, 8, 22

- C -

11 **C-O-L-L-U-M** [1] 59:9
 12 **CALDING** [2] 41:2; 64:15
 CALLING [1] 105:15
 13 **CAMPAIGN** [28] 77:22; 78:6, 11, 24; 79:1, 12, 15, 24; 80:1, 4, 8, 11,
 12, 13, 17, 20; 81:3, 13, 23; 82:7; 83:1, 15; 85:9, 13; 86:3, 14;
 14 106:3
 CAPABILITY [2] 111:8, 15
 15 **CAPABLE** [1] 13:14
 CAREFUL [1] 74:24
 16 **CATEGORY** [1] 28:24
 CAUSES [1] 81:21
 17 **CENTRAL** [13] 2:8; 5:4; 10:13; 21:22; 22:12; 57:9, 18, 23; 61:9, 15;
 108:9, 15; 116:7
 18 **CERTIFIED** [7] 1:20, 21; 3:4; 119:3, 4, 5
 CERTIFY [4] 91:16; 93:15; 119:5, 14
 19 **CHARITABLE** [1] 97:24
 CHILDREN [1] 24:1
 20 **CHOKED** [1] 15:14
 CHOPPING [1] 72:16
 21 **CIRCUIT** [4] 1:1; 4:1, 19; 5:9
 CIRCUMVENT [2] 69:6, 13
 22 **CIRCUMVENTED** [1] 69:21
 CLAIM [5] 41:24; 69:1; 71:10, 20; 96:12
 23 **CLAIMED** [1] 41:21
 CLAIMING [1] 68:21
 24 **CLAIMS** [2] 42:5; 67:4
 CLARIFICATION [1] 33:13
 25 **CLARIFY** [2] 66:21; 92:10
 CLARITY [2] 24:6; 33:17

1 **CLASSIFY** [1] 49:1
 CLASSIFYING [1] 49:4
 2 **CLEAR-CUT** [1] 91:9
 CLEARER [1] 41:1
 3 **CLEARLY** [1] 6:15
 CLERK [1] 119:15
 4 **CLUB** [1] 46:8
 COLLEGE [1] 10:10
 5 **COLLUM** [2] 59:9; 94:9
 COLUMN [1] 59:9
 6 **COMFORTABLE** [7] 49:20, 24; 51:25; 52:10, 14; 87:21; 92:19
 COMMENT [2] 75:15; 77:21
 7 **COMMENTS** [1] 74:15
 COMMUNICATE [3] 41:7, 9; 84:15
 8 **COMMUNICATED** [1] 43:21
 COMMUNICATION [1] 23:13
 9 **COMMUNICATIONS** [1] 93:10
 COMMUNITY [8] 60:8, 10; 62:13, 17; 63:22; 64:1, 4, 11
 10 **COMPLETELY** [3] 9:7; 14:23; 26:3
 CONCEPT [1] 63:23
 11 **CONCEPTION** [2] 60:8; 63:24
 CONCLUDES [1] 116:5
 12 **CONDUCT** [5] 13:6, 12; 14:12, 15; 79:24
 CONFIDENTIAL [1] 91:5
 13 **CONFIRM** [1] 58:6
 CONFIRMING [1] 99:7
 14 **CONFUSE** [1] 29:3
 CONFUSED [1] 48:7
 15 **CONFUSING** [1] 87:4
 CONNECTIONS [1] 111:1
 16 **CONSCIOUS** [1] 45:18
 CONSENSUAL [3] 13:8, 9; 47:9
 17 **CONSEQUENCES** [1] 39:17
 CONTACT [7] 12:18; 13:9; 74:12; 90:16; 98:8; 107:21
 18 **CONTACTS** [1] 71:19
 CONTAINED [1] 43:16
 19 **CONTEMPLATING** [1] 55:15
 CONTEND [2] 55:15; 66:16
 20 **CONTENTION** [1] 66:8
 CONTESTED [1] 114:9
 21 **CONTEXT** [3] 43:20; 72:20, 21
 CONTINUED [3] 38:9; 93:1
 22 **CONTRIBUTION** [6] 79:12, 16; 80:1, 5; 81:13, 23
 CONTROL [1] 72:4
 23 **CONTROVERSY** [2] 91:8; 119:10
 CONVENED [1] 93:17
 24 **CONVERSATION** [7] 44:11, 20; 83:17; 99:17; 100:11, 16; 103:24
 CONVERSATIONS [8] 22:15; 30:2; 77:25; 78:3; 87:23; 104:3; 105:6, 9
 25 **CONVICTIONS** [1] 68:23
 CORI [9] 59:11, 13; 77:16; 78:8, 14; 80:12; 82:9; 86:16

- 1 CORI'S [3] 77:22; 78:6, 11
 COSTING [1] 113:21
- 2 COUNSELORS [1] 5:13
 COUSIN [1] 101:23
- 3 CRAZY [4] 27:25; 29:18, 24; 30:1
 CRIMINAL [1] 68:23
- 4 CRITICALLY [1] 18:14
 CROWD [2] 69:5, 12
- 5 CRYPTIC [1] 46:5
 CURSE [1] 32:20
- 6 CUTE [2] 102:7; 103:18
-
- 7 - D -
-
- 8 DAMAGING [1] 66:10
 DARLENE [3] 94:9, 16, 22
- 9 DATING [10] 12:4; 31:19; 36:6; 38:24; 43:11; 44:1; 48:23; 89:23;
 92:25
- 10 DEAL [1] 114:1
 DEALING [1] 113:8
- 11 DEBACLE [1] 85:10
 DECEMBER [3] 74:6; 100:4; 107:13
- 12 DECLINE [1] 81:6
 DEFEND [2] 67:3, 7
- 13 DEFINITELY [2] 23:23; 69:11
 DEFINITION [2] 44:23; 50:10
- 14 DELETED [2] 74:5; 107:13
 DEMONSTRATING [1] 45:11
- 15 DEPOSE [1] 6:25
 DEPRIVED [1] 31:12
- 16 DESCRIBE [4] 11:3; 12:1; 27:15; 55:1
 DESIGNATION [2] 95:13, 19
- 17 DESIRE [1] 39:16
 DESIRES [1] 118:18
- 18 DETERIORATE [1] 39:8
 DETERIORATED [1] 39:9
- 19 DETERIORATING [1] 26:17
 DIANA [1] 101:23
- 20 DIFFERENTLY [1] 47:13
 DIFFICULT [1] 105:23
- 21 DILIGENCE [1] 79:25
 DIRECTED [2] 24:15; 111:6
- 22 DIRECTLY [6] 24:4, 13, 16; 58:15; 59:13
 DISCONNECT [1] 15:20
- 23 DISCONTINUE [1] 14:9
 DISCONTINUED [1] 14:4
- 24 DISCOVERABLE [2] 6:15; 91:11
 DISCUSSION [2] 51:3; 61:10
- 25 DISRESPECTFUL [1] 31:13
 DOCKET [1] 114:12

1 DONATING [1] 81:4
 DONATION [1] 80:9
 2 DOYEN [1] 2:12
 DRAGGED [1] 72:24
 3 DRIVING [3] 48:2, 3; 50:16
 DROP [1] 34:18
 4 DROPPED [6] 35:8, 23; 36:4; 112:6, 11
 DROPPING [3] 35:2, 17; 37:13
 5 DUMP [2] 35:21, 23

6 **- E -**

7 E-TRANSCRIPT [1] 116:23
 EACH [3] 8:6, 7, 9
 8 EARLY [4] 31:18; 34:12; 45:21; 47:11
 EASY [1] 19:4
 9 EDUCATION [2] 95:12, 13
 EFFECTIVELY [2] 63:11, 15
 10 EFFORT [4] 19:3, 10; 32:19; 49:9
 EILERTS [1] 2:8
 11 EISEN [1] 2:7
 ELIKA [1] 101:23
 12 EMAILS [7] 3:17; 6:5, 9, 13, 23, 25; 32:7
 EMOTIONAL [2] 37:12; 96:10
 13 EMOTIONALLY [3] 29:14; 80:9; 90:7
 EMPATHY [3] 45:11, 16; 85:12
 14 EMPLOYED [1] 9:24
 EMPLOYERS [1] 97:17
 15 ENCOURAGED [1] 89:25
 END-END [1] 33:7
 16 ENGAGE [4] 14:12, 15; 16:6; 37:20
 ENGAGED [3] 12:18; 13:5, 11
 17 ENGAGING [1] 13:2
 ENJOY [1] 49:7
 18 ENJOYED [1] 19:11
 ENSURE [1] 44:21
 19 ENTER [1] 63:11
 ENTERED [1] 111:19
 20 ENTIRELY [1] 115:14
 ENTITLED [1] 31:13
 21 ERRORS [1] 115:2
 ESSENTIALLY [6] 62:1; 63:22; 67:16; 69:4; 70:18; 104:12
 22 EVENING [1] 25:4
 EVERY [2] 53:1; 65:9
 23 EVERYBODY [4] 20:6; 22:8; 66:10; 69:1
 EVERYONE [1] 22:2
 24 EVERYTHING'S [2] 114:23; 115:4
 EXCHANGED [1] 23:9
 25 EXCHANGES [1] 33:2
 EXECUTED [1] 69:21

1 **EXECUTIONS** [2] 70:6, 12
 EXPECT [1] 46:22
 2 **EXPEND** [1] 113:8
 EXPERIENCE [10] 45:19; 48:23; 56:8; 66:17, 18; 67:12, 23; 68:4, 5;
 3 90:8
 EXPERIENCED [4] 66:14; 67:12, 19; 105:14
 4 **EXPERIENCES** [4] 42:23; 91:1, 23
 EXPERIENCING [1] 47:19
 5 **EXPLAINED** [1] 78:3
 EXPLAINING [1] 51:2
 6 **EXPLICITLY** [1] 24:17
 EXPOSE [1] 87:13
 7 **EXPRESS** [3] 12:25; 38:7, 10
 EXPRESSING [1] 38:3
 8 **EXTRAORDINARILY** [1] 50:8
 EYESIGHT [1] 18:7
 9

- F -

10
 11 **FACEBOOK** [9] 3:16; 41:16; 71:14; 73:25; 74:2, 4, 12, 14; 107:13
 FAIROAKS [1] 2:17
 FAMILIAR [3] 59:1, 20; 69:15
 12 **FEEDBACK** [2] 19:16; 29:24
 FEELING [3] 26:19; 27:6; 88:16
 13 **FEELINGS** [3] 11:3, 8; 44:19
 FEELS [1] 91:20
 14 **FEES** [4] 113:8, 16, 17, 22
 FIGHT [1] 14:17
 15 **FINAL** [1] 39:9
 FINE [4] 53:9; 92:20; 116:1, 2
 16 **FINISH** [2] 42:18; 43:19
 FIVE [1] 85:25
 17 **FLORIDA** [8] 8:23; 9:18, 22; 10:13; 48:2; 54:19, 22, 24
 FOLKS [8] 41:10, 16; 58:4, 6; 68:21; 69:20; 71:17; 110:17
 18 **FORCE** [7] 14:11, 14, 22; 15:9; 33:24; 34:10
 FORCED [3] 15:2, 21; 37:1
 19 **FORMERLY** [1] 5:6
 FORTH [2] 9:8; 23:4
 20 **FOUND** [2] 7:1; 31:8
 FOUNDED [1] 71:8
 21 **FOUR** [2] 9:4; 85:21
 FOURTH [1] 74:18
 22 **FRIDAY** [1] 4:12
 FRIEND [5] 78:12; 88:22; 89:16, 24; 90:20
 23 **FRIENDS** [3] 89:25; 101:23; 110:9
 FRONT [10] 19:1; 28:12, 14, 15, 20; 34:18; 35:8, 22; 36:5; 37:14
 24 **FRUSTRATED** [3] 30:24; 33:15; 34:7
 FRUSTRATING [1] 88:4
 25 **FUCK** [1] 37:10
 FUNDAMIST [1] 44:2

1 FUNDAMISTS [1] 44:7

2

- G -

3 GASLIT [6] 27:7, 16, 19; 28:11, 13, 24

GENERALLY [2] 46:13; 70:20

4 GIST [2] 83:10; 84:9

GLOBAL [1] 105:5

5 GOALS [9] 105:18, 24; 106:3, 11, 13, 20, 22, 25; 107:5

GONZALEZ [1] 56:4

6 GOSH [1] 88:23

GOTTEN [1] 33:6

7 GRADUATED [1] 10:6

GRAND [1] 71:11

8 GROUP [8] 62:2; 71:9; 93:17, 23; 94:10; 96:4, 7, 21

GROUPS [1] 41:15

9 GROWE [1] 2:7

GUESSING [1] 37:15

10 GUILTY [4] 45:17; 70:21, 24; 71:8

GUYS [1] 107:25

11

- H -

12

HADN'T [3] 43:25; 106:7, 8

13 HALLOWEEN [2] 70:16, 17

HANDLE [4] 31:2; 46:2, 10; 85:11

14 HASHTAG [5] 59:21, 24; 61:17; 62:9; 71:14

HATERS [5] 45:25; 46:2, 3, 9, 10

15 HEADPHONES [1] 109:10

HEADSET [4] 60:14, 15, 21, 24

16 HEALTH [1] 92:2

HEALTHY [2] 18:15; 31:1

17 HELL [1] 65:14

HIGHLIGHTED [3] 38:6; 47:6; 85:20

18 HISTORY [2] 69:16; 70:14

HOMOLO [1] 56:2

19 HONOR [1] 72:25

HOPEFULLY [1] 114:8

20 HORRIFIC [1] 71:11

HOUSE [22] 9:9; 24:23; 59:17, 18; 60:6, 10; 61:22, 24; 62:11, 12, 16;

21 63:24; 64:6, 10; 73:9; 96:22, 23; 97:15; 106:2

HUNDRED [3] 23:23; 65:4; 107:12

22 HUNG [1] 28:17

HURTING [1] 75:2

23 HUSBAND [3] 56:8; 65:23

HYPOTHETICAL [3] 69:15; 70:4; 102:25

24

- I -

25

- 1 IDENTITY [1] 46:17
 ILLEGAL [2] 69:23; 70:4
 2 IMMEDIATELY [1] 112:20
 IMPORTANT [1] 82:8
 3 INAPPROPRIATELY [1] 81:11
 INAUDIBLE [6] 11:13; 17:24; 22:9; 40:23; 104:18, 19
 4 INCAPACITATED [2] 13:12; 15:16
 INCLINED [1] 68:3
 5 INDEX [3] 2:1; 3:1, 9
 INDIVIDUALS [7] 12:19; 13:3; 52:24; 53:13, 16, 22; 71:10
 6 INFLUENCE [5] 77:18; 81:25; 82:2; 83:4; 84:3
 INFLUENCED [2] 81:12, 14
 7 INFORMATION [3] 19:13; 91:6; 93:10
 INITIATE [1] 52:22
 8 INITIATED [1] 56:9
 INJURIES [1] 91:13
 9 INNOCENT [3] 70:21, 24; 71:7
 INQUIRY [2] 56:12; 91:5
 10 INSTANCE [1] 49:10
 INSTANCES [1] 52:13
 11 INTENSE [1] 85:10
 INTENT [3] 6:24; 103:11; 111:9
 12 INTERACTION [1] 44:21
 INTERCOURSE [3] 48:22, 24; 49:12
 13 INTERFERING [1] 20:6
 INTERPRET [1] 44:25
 14 INTERPRETATION [1] 84:11
 INTERPRETED [2] 42:24; 88:14
 15 INTERPRETING [2] 45:2; 105:11
 INTERRUPT [2] 16:25; 95:3
 16 INTERRUPTED [1] 79:5
 INTERRUPTING [2] 7:11; 51:15
 17 INTERVENTION [1] 68:22
 INTIMATE [1] 22:15
 18 INTRODUCED [1] 89:18
 INVOLVEMENT [1] 78:23
 19 ISAIAH [2] 41:3; 64:17
-
- 20 - J -
-
- 21 JANUARY [1] 10:7
 JEALOUS [1] 12:17
 22 JESSIE [7] 41:3, 4; 58:20, 22, 24; 64:16
 JOEY [3] 54:8, 12; 55:3
 23 JOHN [12] 2:2; 5:15; 7:20; 12:10; 20:22; 51:17; 56:20; 57:5;
 60:19; 82:19; 93:13; 98:22
 24 JOHNS [2] 94:9, 12
 JOIN [1] 70:8
 25 JUDGE [1] 70:12
 JUDICIAL [3] 69:6, 13; 70:5

1 **JULIA** [1] 59:6
 JUMP [2] 22:1; 42:7
 2 **JUNE** [2] 21:9, 12
 JUSTICE [4] 69:5, 12, 22; 70:19
 3 **JUSTINE** [3] 59:9; 94:1, 8

4 **- K -**

5 **KAMINSKY** [9] 1:6; 2:7; 4:6, 22; 5:7, 20; 41:4; 73:14; 106:20
 KAMINSKY'S [2] 85:1, 15
 6 **KARLEN** [1] 2:8
 KELLERMAN [16] 2:7; 5:19; 20:2; 57:11, 16; 70:2, 11, 15; 109:5, 12,
 7 20; 114:18; 116:12, 16, 19
 KEPT [1] 40:5
 8 **KERSHMAN** [68] 2:2, 3; 3:2; 4:14; 5:15; 6:2; 7:4, 10, 12, 14, 16, 20;
 14:8; 15:24; 16:3, 14, 21; 17:1, 16, 22; 18:3; 19:15, 20, 23; 20:5,
 9 23; 21:12, 18; 22:4, 7; 32:8, 12; 42:12; 50:7, 14, 19; 51:6, 13;
 56:22; 57:1, 6; 60:18, 20, 23; 61:3, 6, 13; 70:7, 10; 82:20; 87:1, 5,
 10 7; 91:15; 93:14; 102:2; 104:9, 19, 24; 107:22; 108:2, 5, 12; 109:6,
 21; 114:17; 116:10
 11 **KICK** [2] 83:4; 84:3
 KILL [1] 110:24
 12 **KILLED** [5] 111:1, 12, 14, 15
 KING [2] 2:16; 5:11
 13 **KISSED** [2] 48:16, 18
 KISSING [2] 48:11; 55:11

14 **- L -**

15 **LAURA** [2] 41:2; 64:15
 16 **LAWN** [1] 36:5
 LAWYER [2] 90:10; 111:25
 17 **LAWYERS** [2] 112:20; 113:2
 LEGAL [6] 2:16; 5:12; 70:22, 23; 71:6; 113:8
 18 **LENGTH** [1] 11:22
 LENS [1] 44:2
 19 **LESS** [1] 69:2
 LIMITATION [1] 118:12
 20 **LIMITED** [1] 7:1
 LISTEN [1] 75:3
 21 **LISTENING** [1] 44:17
 LITERALLY [1] 70:11
 22 **LITIGATION** [1] 6:12
 LOBBYISTS [1] 81:19
 23 **LOCATE** [1] 17:16
 LOCATED [1] 54:11
 24 **LONG-TERM** [5] 26:21, 24; 27:3; 39:14
 LOST [1] 107:7
 25 **LOUD** [1] 8:4

1 LOVE [1] 110:15
 LOVED [1] 11:10
 2 LUNCH [2] 57:2, 20

3 - M -

4 MARCH [2] 11:25; 38:25
 MARRIAGE [1] 26:25
 5 MARY [2] 41:3; 64:15
 MASSOUDNIA [1] 77:15
 6 MEANT [1] 15:20
 MEANTIME [1] 21:1
 7 MEDIATION [1] 95:14
 MEDIATOR [7] 94:19, 21, 24; 95:5, 9, 10, 17
 8 MEDIATORS [3] 93:19, 23; 95:11
 MEDICAL [2] 91:6; 98:19
 9 MELISSA [2] 2:16; 5:11
 MEMORIES [1] 74:10
 10 MENTAL [2] 91:7; 92:2
 MERAMEC [1] 2:13
 11 MESSAGE [11] 3:12; 23:11; 31:15; 32:15; 41:15; 42:14; 47:5; 76:5;
 77:6; 87:9, 18
 12 MESSAGES [12] 3:13, 14, 15; 16:19; 21:3; 22:14; 23:3, 9, 16; 25:16;
 76:22; 86:21
 13 MESSAGING [1] 105:4
 METRODEPOS [1] 1:25
 14 MICHAEL [6] 2:12; 5:17; 51:6, 14; 108:6; 116:20
 MIND [4] 18:14; 53:6, 8; 114:5
 15 MISCHARACTERIZES [2] 45:14; 71:4
 MISCONDUCT [7] 24:5, 15, 21; 30:13; 40:10, 15; 41:17
 16 MM-HMM [12] 23:1; 37:8, 11; 44:16; 53:24; 61:3; 63:3; 79:13; 88:4;
 90:14; 110:10, 13
 17 MONOGAMOUS [2] 31:2; 46:25
 MONTHLY [1] 64:8
 18 MOOD [3] 52:23; 53:6
 MOSTLY [1] 76:21
 19 MOUNA [150] 1:3; 2:20; 4:3, 20; 5:5; 7:21; 11:4, 15, 18, 21; 12:6,
 12, 17; 13:1, 6, 11; 14:5, 11, 14; 16:5; 17:4; 18:12; 21:4; 23:9,
 20 20, 25; 24:4, 12, 20; 25:17; 26:7, 11, 15; 28:1; 30:6; 31:16; 33:3,
 14, 24; 34:6, 9, 18; 36:4; 37:13, 20, 24; 38:15, 19; 39:3, 6, 16, 17,
 21 20; 40:8, 10, 16; 41:17, 19, 21, 24; 42:5, 24; 43:8; 44:19; 45:10;
 46:12, 15; 47:7, 20; 50:6; 53:13, 16, 18; 56:15; 58:3; 59:17; 60:11;
 22 61:19, 21, 23; 62:2; 63:8, 11, 15, 24; 64:3, 5; 65:12; 66:1, 8;
 71:10, 20; 72:3, 14, 16, 18; 73:2, 8, 12; 75:7, 19; 79:17; 81:22;
 23 83:3; 89:5, 7, 12, 17; 91:1, 24; 96:5, 10, 12; 97:11, 17, 24; 98:5,
 17; 99:4, 11, 17, 19; 100:21, 25; 101:5, 17, 22; 102:8, 10, 14, 20, 22,
 24 25; 104:1, 5; 105:10; 107:7, 16, 20; 108:25; 110:6, 17, 22, 24, 25;
 111:3; 113:8, 16, 25
 25 MOUNA'S [6] 39:23; 63:21; 78:23; 96:22; 110:14; 113:14
 MOVEMENT [7] 60:3, 5, 9; 62:10, 16; 63:12; 74:8

1 **MULTIPLE** [4] 13:19, 23; 71:17, 18
 MUTED [1] 20:3
 2

- N -

3
 4 **NATASHA** [7] 1:6; 2:7; 4:6, 22; 5:6, 20; 73:14
 NATASHA'S [1] 85:7
 NEVERTHELESS [1] 83:11
 5 **NEWS** [2] 72:22; 108:16
 NICHOLAS [4] 1:3; 4:3, 21; 5:6
 6 **NICK** [55] 11:11, 13, 17; 26:20; 37:3, 4; 43:11, 25; 44:12, 18; 45:25;
 46:15, 24; 48:1, 3; 50:16; 62:11; 73:21; 74:9; 76:1; 77:1, 17, 22;
 7 78:5, 10, 13, 19, 20, 23, 25; 79:10; 83:1, 3; 84:2; 89:23; 92:25;
 93:2, 4, 5; 94:2, 13; 95:1; 97:5, 10; 100:13; 105:14, 15; 114:8
 8 **NICK'S** [4] 78:23; 82:8; 97:15; 114:6
 NIGHT [1] 19:11
 9 **NIGHTTIME** [2] 48:4; 50:17
 NILES [2] 94:9, 12
 10 **NINE** [1] 17:19
 NOBLE [1] 96:1
 11 **NOBODY** [1] 74:12
 NOISE [2] 19:16; 109:16
 12 **NOISES** [1] 19:25
 NONCONSENSUAL [1] 47:16
 13 **NONREDACTED** [1] 87:18
 NOON [1] 57:2
 14 **NORMALLY** [1] 31:12
 NORMAN [13] 1:10; 2:12; 4:9; 5:2, 7, 18, 24; 6:5, 20; 7:19; 10:14;
 15 116:6; 119:7
 NORTHEAST [1] 69:20
 16 **NOVEMBER** [6] 1:12; 4:13; 5:3; 6:7; 8:21; 100:4
 NOWHERE [1] 63:14
 17 **NUDE** [4] 100:25; 101:5, 16; 103:1
 NUMEROUS [1] 69:20
 18

- O -

19
 20 **O'CLOCK** [3] 4:12; 57:9; 116:7
 OATH [1] 84:14
 OBJECTED [1] 113:2
 21 **OBSTRUCTIONIST** [1] 56:21
 OBVIOUSLY [2] 16:15; 104:16
 22 **OCCUPY** [7] 59:21, 24; 61:17; 62:8, 9; 71:14; 74:8
 OCCUPYING [1] 61:18
 23 **ONGOING** [1] 95:13
 OPTIONS [1] 110:17
 24 **ORGANIZATION** [1] 83:25
 ORGANIZATIONS [5] 97:24; 105:20, 25; 106:9, 11
 25 **ORGANIZED** [1] 106:15

1 ORLANDO [2] 8:23; 54:25
 OTHERS [1] 71:24
 2 OVERBROAD [1] 11:6
 OVERREACTED [1] 35:10
 3 OVERREACTION [1] 35:18
 OWNED [2] 60:12; 61:19
 4 OWNER [1] 62:6
 OWNERSHIP [2] 64:2, 3
 5 OWNS [1] 61:21

6 - P -

7 P.M. [11] 4:12; 57:18, 20, 21, 23; 61:8, 15; 87:6; 108:9, 14; 116:7
 P.O. [1] 1:23
 8 PACKED [1] 39:10
 PAGES [10] 3:17; 6:4, 23; 16:10, 13, 18; 17:19; 42:8; 76:17; 87:2
 9 PARENTS [1] 54:18
 PARKING [2] 48:5, 10
 10 PARTICULAR [5] 17:20; 33:13; 49:4; 80:11; 105:8
 PARTICULARLY [2] 27:12; 51:25
 11 PARTNERS [2] 51:24; 52:22
 PASSENGER [2] 48:4; 50:17
 12 PATIENTLY [1] 74:23
 PATTERN [1] 68:10
 13 PAUSED [2] 48:15
 PERCEIVED [1] 67:23
 14 PERCEIVES [1] 66:18
 PERCENT [4] 23:23; 65:4; 82:21; 107:12
 15 PERCEPTION [3] 41:25; 44:20; 53:12
 PERFECT [1] 57:10
 16 PERFECTLY [1] 96:1
 PERHAPS [1] 12:10
 17 PERMISSION [1] 56:10
 PERSON'S [1] 54:6
 18 PERSPECTIVE [1] 47:4
 PETITION [1] 111:20
 19 PHARMACIST [2] 10:4, 5
 PHARMACY [2] 10:2, 10
 20 PHONE [4] 24:14; 25:20, 22, 24
 PHOTOGRAPHS [1] 17:8
 21 PHYSICIAN [1] 93:9
 PICK [1] 58:1
 22 PICTURE [1] 109:8
 PLEADED [1] 13:19
 23 PLEADINGS [1] 114:12
 PLEASING [1] 19:10
 24 PLURAL [1] 101:10
 POCKETS [1] 82:11
 25 POLICE [3] 68:22; 98:9; 99:8
 POLITE [1] 74:24

1 POLITICAL [2] 80:4; 97:23
 POLITICIAN [6] 80:4, 13; 81:11, 25; 82:2; 97:21
 2 POLITICIANS [2] 81:14, 20
 POLITICS [1] 84:6
 3 POLYAMOROUS [1] 46:16
 POSSESSION [3] 100:18, 24; 101:2
 4 POSTED [3] 59:23; 60:2; 62:14
 POSTING [1] 62:10
 5 POSTS [7] 3:16; 41:12, 14, 19; 74:14; 105:20; 106:1
 POTENTIALLY [1] 66:10
 6 POWER [1] 82:7
 PREJUDICE [1] 6:20
 7 PREMISE [1] 70:20
 PREMISED [1] 6:22
 8 PRESENTLY [1] 8:22
 PRESSURE [1] 13:20
 9 PRESSURED [1] 65:13
 PRESTIGE [1] 107:8
 10 PRESUME [3] 8:13; 67:22; 79:10
 PRESUMED [1] 69:22
 11 PREVENT [1] 107:3
 PRIVATE [4] 28:18; 46:7; 56:20; 64:2
 12 PRIVILEGED [2] 93:8, 10
 PROACTIVELY [1] 97:9
 13 PROBLEMATIC [2] 40:4; 79:21
 PROCEDED [2] 48:18; 49:25
 14 PROCESS [3] 27:20; 45:4, 11
 PROFESSIONAL [3] 92:2, 3; 107:8
 15 PROFESSOR [1] 89:22
 PROPERTY [5] 9:12; 36:7; 63:16, 21; 64:2
 16 PROSECUTION [1] 68:23
 PROTECTION [5] 66:2; 89:12; 90:3; 93:18; 96:14
 17 PROVEN [2] 70:21, 24
 PUBLIC [4] 40:12; 41:12; 66:22; 72:25
 18 PUBLICLY [4] 40:9, 11; 66:19; 71:18
 PURELY [1] 17:9
 19 PURPORT [1] 6:10
 PURPORTED [2] 6:4, 9

- Q -

21 QUALIFICATION [1] 95:23
 22 QUALIFICATIONS [1] 95:16
 QUALLS [2] 41:3; 64:17
 23 QUIETLY [1] 74:23
 24 QUITE [2] 22:14; 23:3

- R -

25

- 1 **RADIX** [17] 24:23; 59:18, 21, 24; 60:6; 61:18, 19, 22; 62:9, 11, 12,
16; 63:24; 71:14; 74:8; 106:2
- 2 **RAPE** [22] 42:3, 24; 43:2, 5, 7; 44:8, 11; 45:22; 47:15, 21; 49:5;
50:7, 10, 14; 52:12, 16, 17; 53:8; 56:18; 96:13; 99:4
- 3 **RAPED** [19] 41:22, 24; 43:13, 22; 47:20; 49:2; 50:15; 52:1; 53:2, 13,
15, 21, 22; 55:16; 66:23; 72:23; 80:10; 98:5, 17
- 4 **RAPING** [5] 24:18; 45:6, 11; 50:6; 68:21
RATHER [3] 66:16, 18; 98:25
- 5 **REACH** [5] 89:9, 14; 92:1; 97:22; 106:2
REACHED [12] 90:3, 20; 91:18, 22; 92:24; 97:16, 19; 99:2, 8; 106:7,
8, 10
- 6 **REACHING** [5] 58:17; 59:12, 14; 105:19, 25
- 7 **REACT** [2] 31:9; 103:3
READMIT [1] 57:15
- 8 **REALITY** [1] 27:23
REALIZED [1] 48:13
- 9 **REALTIME** [2] 1:21; 119:5
REASK [1] 98:23
- 10 **REASSURE** [1] 43:12
RECEPTIVE [1] 18:22
- 11 **RECESS** [3] 21:24; 57:20; 108:11
RECORDINGS [1] 17:9
- 12 **RECOVER** [1] 107:18
REDACTED [6] 76:17, 20, 21, 23; 82:6
- 13 **REFERENCE** [1] 11:17
REFERENCING [2] 72:21; 85:22
- 14 **REFUSED** [2] 65:14; 96:22
REFUSING [1] 73:11
- 15 **REGAINING** [1] 72:25
REGARDLESS [1] 70:6
- 16 **REGISTERED** [2] 1:21; 119:5
REITERATE [2] 32:1; 48:19
- 17 **RELATION** [1] 75:6
RELATIONS [1] 65:23
- 18 **RELATIONSHIP** [53] 10:23; 11:1, 4, 9, 21, 23; 12:1, 5, 12; 13:1; 14:5,
10; 24:3, 11, 17, 24; 26:7, 15, 17; 31:2; 33:6, 8; 34:3, 4; 36:23;
19 39:5, 18, 21; 44:22; 46:12, 20, 23; 47:7, 10, 12, 20, 22; 54:21;
20 55:18, 22; 72:9; 73:21; 78:5; 86:16; 93:5; 96:9; 98:6, 16; 99:2, 5,
12; 106:19; 111:5
RELATIONSHIPS [1] 47:8
- 21 **RELATIVELY** [2] 91:19, 21
RELEVANCE [1] 56:13
- 22 **RELIVING** [1] 107:15
REMOVAL [2] 62:22, 25
- 23 **REMOVE** [1] 62:6
REMOVING [1] 63:8
- 24 **RENT** [8] 9:13; 64:9, 12, 19, 23; 65:6, 8, 10
REPEAT [7] 8:11; 12:9; 14:13; 51:20; 71:21; 104:2; 105:23
- 25 **REPETITIVE** [1] 58:5
REPHRASE [6] 8:12; 14:19, 20; 41:13; 101:15; 102:18

1 REPRESENTATION [3] 21:3; 23:8, 17
 REPUTATION [2] 66:11; 87:20
 2 RESOLUTION [1] 96:1
 RESPECT [4] 23:15; 71:25; 79:15; 113:13
 3 RESPECTIVE [1] 118:3
 RESTRAINED [2] 14:24; 15:3
 4 RESTRAINING [1] 77:2
 RESUME [1] 99:11
 5 RETAINED [1] 3:20
 RIDICULOUS [1] 69:15
 6 RIGHTS [1] 78:17
 RING [1] 75:13
 7 RODNEY [7] 5:7; 40:22; 64:15, 18; 104:16; 105:7, 13
 ROMANTIC [2] 10:23; 11:21
 8 ROOM [4] 54:13; 55:5, 11; 64:20
 ROYA [17] 77:13, 15, 17, 21; 78:1, 7, 10, 12; 85:5; 86:5, 6, 21; 87:9,
 9 24; 88:9; 106:9
 ROYA'S [1] 86:10
 10 RUDE [2] 15:5; 31:14
 RUINING [1] 87:20
 11

- S -

12
 13 S-E-T-E-L-E [2] 59:7; 89:9
 SALEM [2] 69:16; 70:16
 SAYING [29] 18:2, 3; 19:21; 28:6; 33:14, 17; 36:9, 24; 38:18; 41:19;
 14 42:4; 43:7, 19, 20; 44:6; 64:9; 67:6, 25; 68:6; 70:25; 75:23; 76:7;
 80:25; 83:2; 95:25; 98:25; 106:24; 109:25; 113:21
 15 SCALE [1] 71:11
 SCANDALOUS [1] 103:20
 16 SCARE [1] 35:21
 SCARED [1] 89:15
 17 SCARY [1] 73:4
 SCHOOL [3] 10:6, 9, 12
 18 SCOPE [2] 44:22; 118:12
 SCREENSHOT [2] 3:16; 74:14
 19 SEAT [1] 48:4
 SECOND [8] 19:17; 22:5; 30:11; 36:12; 43:4; 60:14; 87:8
 20 SECTIONS [1] 76:23
 SENDING [1] 102:9
 21 SENSITIVE [1] 49:15
 SENTENCE [1] 43:3
 22 SENTENCES [1] 85:25
 SEPTEMBER [1] 22:19
 23 SEQUIERA [2] 41:4; 58:24
 SERIOUS [2] 47:3; 50:8
 24 SERVED [13] 89:11; 90:2, 12, 17; 111:20, 22; 112:6, 16, 17; 113:3, 6,
 9, 11
 25 SETELE [1] 59:6
 SEVERAL [3] 16:11, 14, 18

1 **SEXUAL** [20] 13:5, 9, 12; 14:12, 15; 16:6; 24:5, 15, 21; 30:7; 37:10;
 39:2; 41:17; 47:8; 51:23; 52:22; 56:7; 65:23; 96:10
 2 **SEXUALLY** [6] 22:25; 24:19; 30:23; 33:15; 34:7; 41:20
SHARE [4] 46:5, 7; 66:14; 101:24
 3 **SHARING** [5] 58:16, 17; 64:19; 102:14, 20
SHIT [1] 32:23
 4 **SHOOT** [1] 72:14
SHORT [2] 60:24; 91:21
 5 **SHOULDN'T** [1] 80:24
SILENCE [2] 66:2; 96:13
 6 **SIMILAR** [2] 68:1, 4
SIMONES [2] 41:3; 64:16
 7 **SIMPLE** [1] 75:2
SINGLE [1] 65:9
 8 **SINGULARLY** [1] 68:12
SITUATION [1] 50:12
 9 **SKEPTICISM** [1] 89:2
SLED [4] 35:2, 18; 37:6, 14
 10 **SLEEP** [1] 31:3
SLOWLY [1] 30:2
 11 **SOCIAL** [2] 59:23; 107:8
SOLIDARITY [4] 60:2; 62:10, 15; 81:7
 12 **SOMEBODY'S** [1] 88:5
SOMEHOW [1] 36:1
 13 **SOMETIME** [2] 100:3; 111:5
SPACE [1] 20:4
 14 **SPARK** [1] 76:2
SPEAK [4] 40:25; 66:6; 78:10; 93:2
 15 **SPEAKER** [1] 82:5
SPEAKING [7] 58:15; 93:1, 3; 94:11; 96:13; 97:4; 113:21
 16 **SPEAKS** [1] 114:11
SPECIALTY [1] 10:2
 17 **SPECULATE** [1] 73:23
SPLIT [1] 64:18
 18 **SPLITTING** [2] 29:15, 22
SPOKE [7] 77:16; 83:15; 86:4; 94:13, 17; 105:13
 19 **SPOKEN** [2] 58:14; 104:14
SPONTANEITY [1] 56:17
 20 **SPONTANEOUS** [2] 48:21; 51:23
SPONTANEOUSLY [1] 56:9
 21 **SPOUSAL** [2] 56:12, 24
SQUARE [1] 72:25
 22 **STANDARD** [10] 5:4; 21:22; 22:12; 57:18, 23; 61:9, 16; 108:9, 15;
 116:7
 23 **STEP** [1] 45:3
STEPPAD [1] 9:23
 24 **STEPHANIE** [1] 58:8
STOCKHOLM [1] 89:5
 25 **STREETS** [1] 72:17
STRESSED [1] 107:15

- 1 **TRULY** [1] 75:1
 TURKISH [1] 72:22
 2 **TURNED** [1] 112:4
 TWICE [3] 41:22; 65:13, 17
 3 **TWITTER** [1] 41:16
 TYPOGRAPHICAL [1] 115:1
 4
-
- U -
-
- 5
 6 **UH-HUH** [2] 19:7; 92:23
 ULTIMATELY [5] 12:6, 12, 15; 39:6; 107:2
 UNCOMFORTABLE [1] 110:15
 7 **UNDER-INFLUENCED** [1] 81:12
 UNDERGOING [1] 90:21
 8 **UNDERGONE** [1] 90:24
 UNDERGRADUATE [1] 10:11
 9 **UNDERMINED** [1] 27:20
 UNFAIR [1] 6:19
 10 **UNITED** [1] 69:6
 UNIVERSITY [1] 10:13
 11 **UNLESS** [2] 47:3; 67:19
 UNSURE [1] 27:22
 12 **UNUSUAL** [2] 68:17, 20
 UPSET [23] 29:13; 31:8; 32:16, 18, 24; 33:22; 36:15, 18; 37:4, 25;
 13 38:1, 6, 9; 39:13; 55:13; 65:18; 82:10; 83:16; 87:19; 88:8; 103:4,
 12, 22
 14
-
- V -
-
- 15
 16 **VAGUELY** [1] 69:18
 VALIDATE [1] 22:25
 VALIDITY [1] 112:1
 17 **VARIES** [1] 49:19
 VARIOUS [1] 105:19
 18 **VERBALLY** [3] 38:4; 41:11; 56:14
 VERONICA [3] 94:9, 16, 22
 19 **VICTIMIZED** [1] 81:8
 VICTIMS [1] 68:24
 20 **VIDEO** [16] 1:9; 100:25; 101:3, 17, 21, 25; 102:4, 9, 17, 18, 21, 23;
 103:1, 18; 116:15, 24
 21 **VIDEO-RECORDED** [1] 5:2
 VIDEOS [5] 101:3, 5, 10, 24; 102:15
 22 **VIEW** [1] 44:17
 VIEWED [1] 103:14
 23 **VIEWS** [1] 29:24
 VINDICATING [1] 71:25
 24 **VOICE** [1] 76:13
 25

1

- W -

2

WAIT [1] 31:17

WAL-MART [1] 10:2

3

WARN [1] 78:8

4

WASN'T [18] 9:7; 15:14, 15; 20:1; 24:10; 36:21; 38:1; 48:6; 53:5,
10; 63:7; 81:5, 6; 87:21; 88:15; 106:14; 114:5

WEBSITE [1] 89:23

5

WEIRD [1] 76:10

6

WEREN'T [10] 15:3; 16:22; 34:8; 43:23; 47:3; 49:24; 51:24; 52:23;
86:8, 9

WISH [4] 32:18; 34:15; 107:17, 20

7

WITCH [1] 69:16

WOMAN [2] 72:22; 89:21

8

WOMEN [4] 75:5; 80:10; 81:6, 7

WOMEN'S [1] 78:17

9

WONDERFUL [1] 19:14

WOODED [1] 48:11

10

WORD [3] 29:21; 30:1; 50:8

WORDS [8] 24:13; 29:19; 72:6; 83:9, 12, 25; 84:2, 4

11

WORRIES [2] 60:20; 93:14

WRAP-UP [1] 108:17

12

WRIGHT [4] 41:4; 54:10, 12; 59:15

WRITING [2] 25:7, 9

13

WRITTEN [3] 6:8, 10; 119:10

WRONG [5] 30:3; 86:8; 95:25; 103:6; 115:11

14

WROTE [3] 43:1; 74:16; 106:12

15

- Y -

16

YARD [5] 34:19; 35:8, 22; 37:7, 14

YOU-ALL [6] 22:15; 23:2; 47:10; 56:5; 66:9; 110:18

17

YOURS [4] 35:3; 36:4; 66:18, 19

YOURSELF [5] 25:16; 33:2; 67:17; 71:25; 95:17

18

- Z -

19

ZOOM [8] 1:9; 2:8, 13, 16; 5:1; 57:12; 119:6

20

21

22

23

24

25