

EXHIBIT A

Transcript of the Testimony of

Date: October 23, 2025

Case: Jane Doe v. Steven K. Bonnell II

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,)
)
Plaintiff,)
)
vs.) No. 1:25-cv-20757-
) JB/Torres
STEVEN K. BONNELL II,)
)
)
Defendant.)

The video-recorded deposition of [REDACTED],
called as a witness herein, taken under oath, before
Amy K. Bateman, CSR No. 84-003803, RPR, CRR, CRC,
taken pursuant to the applicable provisions of the
Federal Rules of Procedure governing the taking of
depositions, at [REDACTED]
[REDACTED], commencing at 9:24 a.m., on
Thursday, October 23, 2025, pursuant to notice.

1 APPEARANCES:

2 SANCHEZ-MEDINA, GONZALEZ, LAGE, GOMEZ &
3 MACHADO, LLP
4 MS. JOAN SCHLUMP PETERS
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9 appeared on behalf of the Plaintiff;

10 BERK BRETTLER, LLP
11 MR. JAKE A. CAMARA, and
12 MR. JOEL SICHEL
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16 jcamara@berkbrettler.com
17 jsichel@berkbrettler.com

18 appeared on behalf of the Defendant.

19 ALSO PRESENT:

20 MR. STEPHAN HOOG, Videographer;

21 [REDACTED], by Zoom;

22 [REDACTED], by Zoom.

23 - - -

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(Exhibits attached/scanned.)

1 THE VIDEOGRAPHER: This is Stephan Hoog with
2 LVS Group Inc. I am the operator of this camera.
3 We're on record October 23rd, 2025. The time is
4 9:24 a.m., as indicated on the video screen.

5 We are at [REDACTED]
6 [REDACTED] Illinois. This is the videotaped
7 deposition of [REDACTED]. This case is captioned
8 Jane Doe versus Steven K. Bonnell II, Case
9 Number 25-CV-20757.

10 Will the attorneys please identify
11 themselves for the video record.

12 MS. SCHLUMP PETERS: Joan Schlump Peters on
13 behalf of the plaintiff.

14 MR. CAMARA: Good morning. Jake Camara along
15 with my colleague Joel Sichel. We're from Berk
16 Brettler, LLP. We're counsel for defendant
17 Steven K. Bonnell, a/k/a Destiny.

18 THE VIDEOGRAPHER: The court reporter today is
19 Amy Bateman with Latimer Reporting.

20 Will you please swear in the witness.

21 (Witness sworn.)

22 THE VIDEOGRAPHER: Please proceed.

23 MS. SCHLUMP PETERS: Counsel, can we agree to
24 the standard stipulations, objections other than to
25 form, privilege, waived until trial?

1 MR. CAMARA: You're welcome to designate this
2 transcript as confidential pursuant to the parties'
3 protective order in this case. We have no objection
4 to that.

5 MS. SCHLUMP PETERS: Okay. I am going to do
6 that; but just in terms of waiving objections until
7 time of trial, are we agreed to that, or do you want
8 to proceed under the Federal Rules of Civil
9 Procedure?

10 MR. CAMARA: Waiving objections to the
11 testimony?

12 MS. SCHLUMP PETERS: No.

13 MR. CAMARA: Or objec- -- can you specify
14 which objections you're referring to.

15 MS. SCHLUMP PETERS: It's just the standard
16 stipulation that you reserve your objections other
17 than as to form and privilege until the time of
18 trial.

19 MR. CAMARA: I'm not understanding what you're
20 asking.

21 MS. SCHLUMP PETERS: Okay.

22 MR. SICHEL: Essentially reserve all
23 objections.

24 MS. SCHLUMP PETERS: Until the time of trial.

25 MR. CAMARA: Sure.

1 MS. SCHLUMP PETERS: Yes?

2 MR. CAMARA: Agreed.

3 MS. SCHLUMP PETERS: Okay. So all objections,
4 except as to the form of question or to privilege,
5 are reserved until the time of trial or other use of
6 this deposition without being waived.

7 MR. CAMARA: Correct.

8 MS. SCHLUMP PETERS: And also standard, the
9 witness will read and sign the transcript within
10 30 days of receipt.

11 And for the record, I do want to
12 state this deposition is taken pursuant to the
13 court's protective order at Docket 116.

14 So, Amy, please mark the entire
15 transcript and all exhibits as confidential, subject
16 to protective order.

17 THE REPORTER: Yes.

18 MS. SCHLUMP PETERS: Thank you.

19 Today is October 23rd, 2025. We're
20 here for the deposition of [REDACTED] in the matter
21 of Jane Doe versus Steven Bonnell pending in the
22 United States District Court for the District of
23 Florida, Case Number 25-20757.

24

25

1 WHEREUPON:

2 [REDACTED]
3 called as a witness herein, having been first duly
4 sworn, was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. SCHLUMP PETERS:

7 Q. Good morning, Ms. [REDACTED] Are you okay if
8 I address you as [REDACTED] or would you prefer

9 [REDACTED]

10 A. [REDACTED] is fine.

11 Q. [REDACTED] Thank you.

12 My name is Joan Peters. I represent
13 the plaintiff, Jane Doe. And these are counsel for
14 the defendant, and they might also be asking you
15 questions today.

16 Before I begin, I want to make sure
17 you understand how a deposition proceeds.

18 First, you're under oath, so your
19 testimony today has the same force as if you were in
20 a court.

21 This deposition will essentially be a
22 question and answer. Make sure you wait until I
23 finish any question before you answer.

24 Please listen carefully to each
25 question. If you don't understand the question,

1 just tell me and I will rephrase it. If you answer
2 it, I will assume that you understood the question.

3 And you have to answer each question
4 audibly; so shaking your head yes or no won't get
5 recorded on the record.

6 If you don't know the answer or don't
7 remember, it's perfectly fine to say so. Please
8 don't guess or speculate.

9 If you realize later that you need to
10 correct or clarify something, you'll have a chance
11 to review the transcript and make changes on what's
12 called an errata sheet at the end of the transcript.

13 You're going to receive the
14 transcript within a few days after today, and you'll
15 have a chance to review it and then you'll need to
16 sign it and return it.

17 And if you need a break at any time,
18 just let me know and we can go off the record and
19 turn the video off. If there's a question pending,
20 you'll need to answer the question first and then
21 we'll take the break.

22 Do you understand?

23 A. Yes.

24 [REDACTED]

1 BY MS. SCHLUMP PETERS:

2 Q. Okay. And next, because you are not
3 represented by counsel here today, I want to make
4 clear that I don't represent you and neither does
5 counsel for the defendant; but if you have any
6 questions during the deposition, I can answer your
7 questions. I just can't give you legal advice.

8 A. Okay.

9 Q. Okay?

10 All right. Can you please state your
11 full name for the record.

12 A. [REDACTED]

13 Q. How old are you?

14 A. [REDACTED]

15 Q. Where do you currently live?

16 A. [REDACTED]

17 Q. Now, you were served with a subpoena in
18 this matter; correct?

19 A. Yes.

20 Q. If you could just take a look at this
21 and tell me if this is the subpoena that you were
22 served with?

23 MR. CAMARA: Ms. Peters, do you have a copy of
24 the exhibits that you're going to be showing to the
25 witness?

1 MS. SCHLUMP PETERS: I do. I just don't have
2 a copy of the subpoena --

3 MR. CAMARA: Okay.

4 BY THE WITNESS:

5 A. Yeah.

6 MS. SCHLUMP PETERS: -- which I did provide.

7 BY MS. SCHLUMP PETERS:

8 Q. Okay. So yes, this is the copy of the
9 subpoena; correct?

10 A. Yes.

11 Q. I am going to mark this as Exhibit 1,
12 but --

13 THE REPORTER: I can do that now.

14 MS. SCHLUMP PETERS: Okay. And then can I
15 just have it back?

16 (█████ Exhibit Number 1 marked.)

17 MS. SCHLUMP PETERS: Thank you.

18 BY MS. SCHLUMP PETERS:

19 Q. So this subpoena asked you to produce
20 documents; correct?

21 A. Yes.

22 Q. And did you produce documents?

23 A. Yes.

24 Q. Okay. I am now going to show you a set
25 of documents. Please review them and tell me if

1 **these are the documents that you produced.**

2 **Disregard the confidential marked on them, but**

3 **otherwise --**

4 MR. CAMARA: Ms. Peters, to the extent you're
5 questioning the witness about a document --

6 MS. SCHLUMP PETERS: Oh, sorry.

7 MR. CAMARA: -- we'll need a copy of these.

8 MS. SCHLUMP PETERS: Sorry about that.

9 And I do have another copy for you
10 which I will be marking as an exhibit, so.

11 BY THE WITNESS:

12 A. Yep.

13 BY MS. SCHLUMP PETERS:

14 **Q. Did you produce any other documents**
15 **other than these?**

16 A. No.

17 **Q. Okay.**

18 THE REPORTER: This is Number 2, Counsel?

19 MS. SCHLUMP PETERS: Yes. And please mark
20 this as Exhibit 2, which are documents marked
21 confidential and are Bates-stamped AH 1 through 10.

22 (█████ Exhibit Number 2 marked.)

23 BY MS. SCHLUMP PETERS:

24 **Q. Now, one of the things that was**
25 **requested in this subpoena, ██████ was**

1 communications between you and SoloTinyLeaks -- I'll
2 just say Solo -- from January 1st, 2022, through the
3 present.

4 Do you have any other responsive
5 documents that you did not produce in that packet?

6 A. No.

7 Q. Okay. What about communications between
8 you and the defendant?

9 A. Destiny?

10 Q. Yes.

11 A. No.

12 Q. On any of your different accounts that
13 you would have for communication?

14 A. No.

15 Q. No? Okay.

16 Now, looking at the first page of
17 Exhibit 2, can you confirm that this is a copy of
18 your birth certificate?

19 A. Yes.

20 Q. Thank you.

21 Okay. Now, turn -- if you turn to
22 the next page, which is Bates-stamped AH 2 and then
23 3, 4, 5, and 6, can you tell me what this is?

24 MR. CAMARA: Ms. Peters, the copy you gave me
25 jumps from AH 1 to AH 3. I do not have AH 2.

1 MS. SCHLUMP PETERS: Hmm. Here, can you look
2 at this copy? Let me make sure this one -- all
3 right. Yeah, this one is complete.

4 MR. CAMARA: Thank you.

5 MS. SCHLUMP PETERS: Sorry about that.

6 BY MS. SCHLUMP PETERS:

7 Q. Okay. So can you tell me what these
8 pages are?

9 MR. CAMARA: Objection; vague and ambiguous.

10 MS. SCHLUMP PETERS: Go ahead and answer.

11 BY THE WITNESS:

12 A. These were e-mails I got from someone
13 named Callum telling me that I got doxxed online,
14 and he sent me lots of e-mails about screenshots he
15 found online and stuff.

16 BY MS. SCHLUMP PETERS:

17 Q. Okay. And who is Callum?

18 A. I don't know.

19 Q. Did you ever respond to Callum?

20 A. A couple times.

21 Q. Okay. Now, on this document on AH 2, it
22 shows your e-mail address as [REDACTED].com?

23 A. Yes.

24 Q. Okay. This is your current e-mail
25 address; correct?

1 A. Yes.

2 Q. Was it also your e-mail address
3 beginning in 2022?

4 A. Yes.

5 Q. So you don't -- have you had any other
6 e-mail addresses besides this one?

7 A. Yes.

8 Q. Can you tell me what those are?

9 A. [REDACTED]

10 Q. [REDACTED]

11 A. [REDACTED]

12 [REDACTED]

13 Q. [REDACTED]

14 A. [REDACTED]

15 Q. Oh, okay. So [REDACTED]

16 A. [REDACTED]

17 Q. And when did -- when was this e-mail
18 address created?

19 A. When I was a kid. I don't remember.

20 Q. Okay. So probably prior to 2022?

21 A. Yes.

22 Q. Okay. And do you still use that e-mail
23 today?

24 A. Not very much.

25 Q. Okay. And turning to AH 8, it's a

1 document with a name on it, Ben Conway. Can you
2 tell us what this is?

3 A. This was a Snapchat username Solo made
4 to try and contact me back in February, and I
5 blocked it. I did talk to him, though.

6 Q. February of this year?

7 A. Mm-hmm.

8 Q. Okay.

9 THE REPORTER: Is that a yes?

10 BY THE WITNESS:

11 A. Yes.

12 BY MS. SCHLUMP PETERS:

13 Q. And you said you did contact -- you
14 blocked him but then you did speak with him?

15 A. He reached out to me on this through
16 Snapchat. I accepted him. I told him not to talk
17 to me or reach out to me, and then he threatened me
18 [REDACTED] so I
19 blocked him and told my parents.

20 He wanted to call me, but I didn't
21 call him.

22 Q. Okay. So after that communication is
23 when you blocked him?

24 A. (Indicating.)

25 Q. And to confirm, Ben Conway, is that the

1 **legal name of Solo?**

2 A. That's what he said it was, so I don't
3 know if that's real or not, but that's what I knew
4 him by.

5 **Q. When did you meet him?**

6 A. November of 2021.

7 **Q. And how did you meet him?**

8 A. An app called Yubo.

9 **Q. Yubo, U-B-O?**

10 A. Y-U-B-O.

11 **Q. Y-U-B-O.**

12 **Is that like a dating app or --**

13 A. It's supposed to be an app for kids to
14 make friends, so you have to be under the age of 18
15 technically.

16 **Q. And how old was he when you met him?**

17 A. 21.

18 **Q. How old were you at that time?**

19 A. 17.

20 **Q. And where was he living when you met**
21 **him?**

22 A. He told me he lived on Michigan Avenue
23 in Chicago, but I think he actually lives in Oxford
24 in England is what he told me later.

25 **Q. And so you met him on Yubo. When did**

1 **you meet him in person?**

2 A. I never met him in person.

3 **Q. Did he ever provide you with any form of**
4 **legal identification or show you any legal**
5 **identification?**

6 A. No.

7 **Q. No.**

8 **And what leads you to believe that he**
9 **was living in Oxford, England, during this time**
10 **period?**

11 A. He had an accent and he -- whenever I
12 asked to meet, he would make up an excuse; so that
13 made me assume he's not actually there. And he also
14 told me he -- that's where he's from. He told me
15 later on in our relationship when I was breaking up
16 with him, in August I think, that he actually had
17 been living in Oxford for longer than he told me.

18 **Q. Okay. So would you say you started a**
19 **relationship with him beginning in November**
20 **2021st -- 2021?**

21 A. Yes.

22 **Q. Yes? Okay.**

23 **Do you have any idea whether he's an**
24 **American citizen or a British citizen?**

25 A. I think he's British. He had an accent

1 and it never, like, changed.

2 **Q. Okay.**

3 A. Also, there is stuff online that pointed
4 to him living in England because of in America how
5 dates are, it's month, date, year, but in England
6 it's different; and so screenshots between him and
7 Destiny talking showed a different date form.

8 **Q. Okay. So there's also, I believe, a**
9 **six -- five- or six-hour time difference between**
10 **England and the United States. So when you were**
11 **communicating with him, were you aware of that time**
12 **difference?**

13 A. Yeah. He often would sleep in the
14 morning and then he'd be awake, like, later
15 afternoon until late at night. And then he would do
16 his work usually -- when I went to bed, he'd have me
17 stay up until, like, 1:00, I think, and he would say
18 that he had to go and do work.

19 **Q. Do you have any knowledge as to where he**
20 **currently resides?**

21 A. No.

22 **Q. So this was a long-distance relationship**
23 **the entire time --**

24 A. Yes.

25 **Q. -- that you were together?**

1 **So he never went to your family home?**

2 A. No.

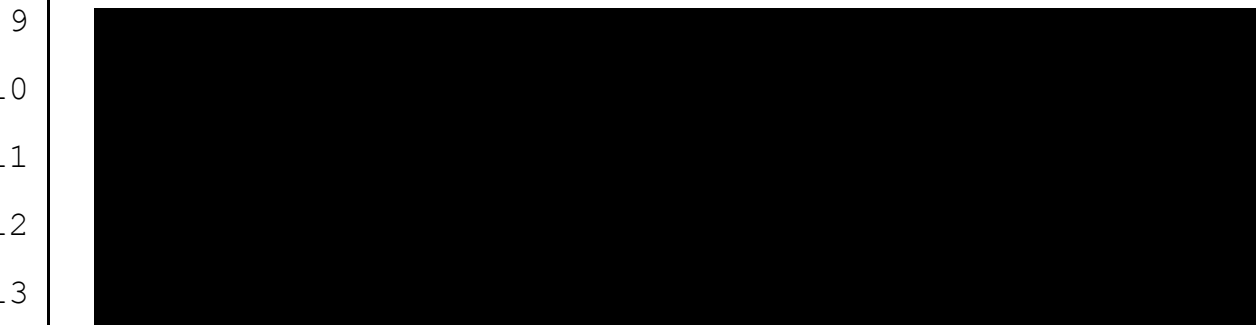
3 **Q. No.**

4 **He never met your family?**

5 A. No.

6 **Q. Okay. When did your relationship with**
7 **him end?**

8 A. August of 2022.



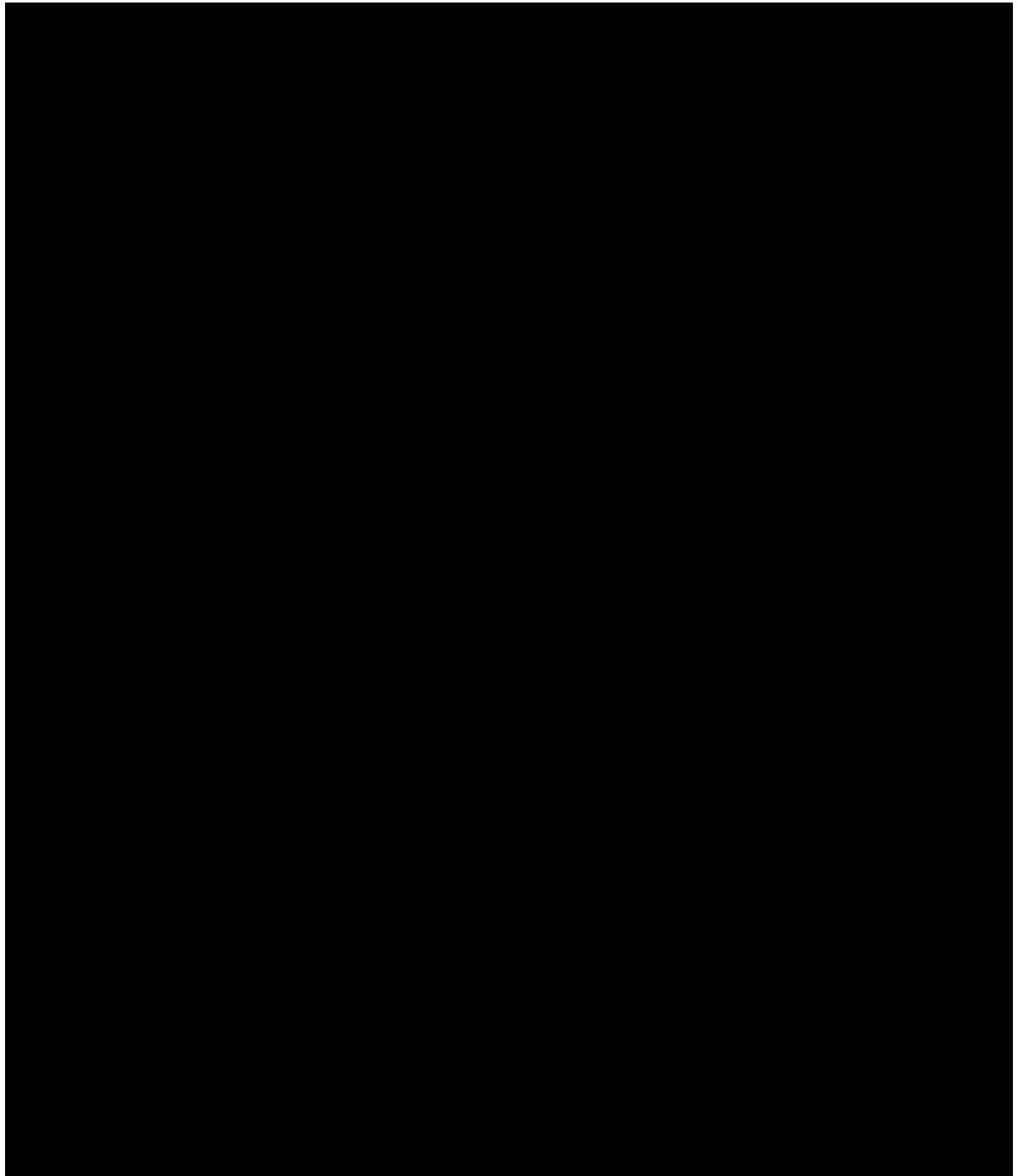
14 **Q. And between August of 2022 and February**
15 **of 2025, did you have any communication with him?**

16 A. I don't think so. He tried to reach out
17 to me a lot, so he would find -- I had to delete
18 my -- my Discord and my Instagram because he would
19 find my Discord and make new accounts and trying to
20 follow me on them or on Snapchat. But I don't
21 remember talking to him in between then.

22 **Q. Okay. We're going to get into your**
23 **Discord account a little bit later.**

24 **I want to show you in what has been**
25 **marked as Exhibit 2, which is in front of you, if**

1 you could turn to page 9 and 10.



23 Q. How did you communicate with Ben?

24 A. We talked through Snapchat. We messaged
25 through Snapchat. And on Discord we also messaged,

1 but that's [REDACTED] have my
2 face camera on but he wouldn't.

3 **Q. So did you ever see his face?**

4 A. Not live.

5 **Q. Did you communicate other than Snapchat**
6 **and Discord on any other platform? Facebook?**
7 **Twitter?**

8 A. Skype.

9 **Q. Skype phone call or --**

10 A. Yeah.

11 **Q. And messaging?**

12 A. Not very much messaging, but Skype call,
13 yeah, and video call. And then I -- no Instagram, I
14 don't think; and then Facebook, no; iMessage, no.

15 **Q. No e-mails?**

16 A. I don't think so, but I don't remember.

17 **Q. All right. That's fine.**

18 **And so your Snapchat messages with**
19 **him, would those still be on your phone?**

20 A. No.

21 **Q. Did you delete your account or --**

22 A. I -- when I stopped being in a
23 relationship with him, I unfriended him and blocked
24 him. And I don't know if he still has his old
25 Snapchat account 'cause when I look in my blocked,

1 like, accounts, his name doesn't pop up for his old
2 one.

3 Q. Okay. What was your cell phone number
4 in 2022?

5 A. [REDACTED]

6 Q. Is that still your current --

7 A. Yeah.

8 Q. -- number? Thank you.

9 So when you met or -- I'm going to
10 say met. I know it wasn't in person but just that
11 you met him long-distance in November 2021, did you
12 have a Discord account?

13 A. Yeah.

14 Q. When was your Discord account created?

15 A. I think in 2020.

16 Q. And what was the user name on your
17 account?

18 A. I don't remember. I deleted that.

19 Q. Okay. So you created a Discord account
20 yourself in 2020?

21 A. Yeah.

22 Q. And when did you delete it?

23 A. I think, like, a week after I broke up
24 with Ben because he kept trying to contact me.

25 Q. So sometime in August 2022?

1 A. August or September 'cause I broke up
2 with him later in August, I think.

3 **Q. Okay.**

4 A. But I'm not exactly sure.

5 **Q. And it would have been created either**
6 **with your cell phone number at the time or your**
7 **e-mail address [REDACTED]?**

8 A. Yeah.

9 **Q. And Ben had a Discord account when you**
10 **met him?**

11 A. Yeah.

12 **Q. Yes.**

13 **Do you know what was Ben's Discord**
14 **user name?**

15 A. Yeah. It was Rose, capital R, Of,
16 capital O, The, capital T, Garden, capital G. And
17 with Discord, you have to -- you have, like, a
18 hashtag --

19 **Q. Okay.**

20 A. -- with a number, and his number was
21 2043.

22 **Q. Did you have a Twitter account prior to**
23 **meeting Ben?**

24 A. I don't think so.

25 **Q. No.**

1 How about you did have an Instagram
2 account prior to meeting him?

3 A. Yeah.

4 Q. Yes.

5 Facebook?

6 A. Maybe. I don't remember.

7 Q. And have you ever had an account with
8 Kiwi Farms?

9 A. No.

10 Q. No.

11 Did Ben have a Twitter account?

12 A. Yeah.

13 Q. Do you know what his Twitter user name
14 was or any --

15 A. I don't know what his one that he had
16 before me that he used; but he made one
17 impersonating me called Rose, capital R, Is, capital
18 I, and then capital C-U-M-M-I-N-G.

19 Q. So to make that account, did he use
20 your, like, e-mail address or a phone -- phone
21 number in order to create it?

22 A. No. He just used my face as a profile
23 picture.

24 Q. Would his -- did he use his own
25 identifying information to create it, such as e-mail

1 **or phone number?**

2 A. I think so.

3 MR. CAMARA: I'm going to object. The witness
4 lacks personal knowledge, calls for speculation.

5 BY MS. SCHLUMP PETERS:

6 **Q. Do you recollect when this Twitter**
7 **account was created, the one that you just stated**
8 **that Ben created under -- with your profile photo?**

9 A. Sometime in 2022, but I don't remember
10 months.

11 **Q. Okay. Maybe early 2022?**

12 A. Maybe. I don't know.

13 **Q. Okay. Now, you had access to this**
14 **account?**

15 A. I don't think so, no.

16 **Q. You never went on that Twitter account?**

17 A. No. He let me make a Twitter account
18 that was just, like, for looking at it because he'd
19 want me to, like, look at it and screen share, or
20 sometimes he would screen share himself and show me
21 that account; but I didn't have access to it, no.

22 **Q. Okay. And what was the Twitter account**
23 **that -- that you created?**

24 A. I don't remember.

25 **Q. Do you still have that account?**

1 A. No.

2 Q. So you created that account after you
3 started your relationship with Ben?

4 A. Yeah.

5 Q. And what -- do you recollect what your
6 user name was?

7 A. No.

8 Q. Do you remember if you had used your
9 e-mail or your phone number to create the account?

10 A. I don't remember.

11 Q. That's okay.

12 And do you have any idea when you
13 deleted it?

14 A. No. I -- I don't know.

15 Q. Sometime in 2022?

16 A. Yeah.

17 Q. So Ben never shared the login
18 credentials for the account that he created with
19 your profile photo?

20 MR. CAMARA: Objection; leading.

21 BY THE WITNESS:

22 A. I don't know. Can you rephrase that?

23 BY MS. SCHLUMP PETERS:

24 Q. Sure.

25 Did Ben share his login credentials,

1 like his user name and password, to access the
2 Twitter account that he created with your profile
3 photo?

4 A. Share it to me?

5 Q. Yes.

6 A. Oh. No.

7 Q. Okay. So you stated that you had an
8 Instagram account prior to meeting Ben?

9 A. Yeah.

10 Q. Did you create any new account after
11 meeting him?

12 A. Not on Instagram.

13 Q. Okay. And I apologize if I asked you
14 this already, but do you recollect what your user
15 name is on the Instagram account?

16 A. This was an old one. I have a new --
17 well, I had to delete that one too.

18 I don't remember.

19 Q. So the Instagram account that you had
20 back in November 2021, when you met Ben, that
21 account is no longer active?

22 A. Yeah, it's deleted.

23 Q. Deleted?

24 A. Yeah.

25 Q. And do you have an idea of when it was

1 **deleted?**

2 A. Around the same time I had to delete my
3 Discord account.

4 **Q. Okay. And approximately when did you**
5 **set up a new Instagram account?**

6 A. Probably sometime in 2022 or 2023, but I
7 don't remember exactly when.

8 **Q. And why did you delete the Instagram**
9 **account?**

10 A. Because Ben was trying to contact me
11 through it.

12 **Q. Okay. So you set up a -- your Discord**
13 **account back in 2020, and you used that account to**
14 **communicate with Ben?**

15 A. Yeah.

16 MR. CAMARA: Objection; compound.

17 BY MS. SCHLUMP PETERS:

18 **Q. And you stated that you don't recollect**
19 **the user name on that Discord account?**

20 A. No. I might -- it might be -- my
21 friends might know. I don't know, ma- -- I could
22 maybe find it for you if I can look through my
23 camera roll because I know I used to take pictures
24 of, like, messages between my friend group and I
25 before I met Ben, so maybe I'll have it. But I

1 don't know it off the top of my head.

2 Q. Okay. Understood.

3 I am going to ask you to try to find
4 that information as to what the user name on the
5 account was --

6 A. Okay.

7 Q. -- or if there was a -- what e-mail
8 address or cell phone number was associated with it.

9 A. Okay.

10 Q. And did anyone else have access to that
11 Discord account?

12 A. I don't think so.

13 Q. Did you ever give Ben your user name and
14 password for that account?

15 MR. CAMARA: Objection; vague. Which account?

16 MS. SCHLUMP PETERS: The account that she
17 created in 2020.

18 Go ahead.

19 BY THE WITNESS:

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

21 BY MS. SCHLUMP PETERS:

22 Q. Okay. Now, after you met Ben, was there
23 another Discord account created?

24 A. No.

25 Q. Did he create an account using your

1 **information?**

2 MR. CAMARA: Objection; vague. What kind of
3 account are we referring to?

4 MS. SCHLUMP PETERS: Discord.

5 BY THE WITNESS:

6 A. Not to my knowledge.

7 BY MS. SCHLUMP PETERS:

8 **Q. Not to your knowledge. Okay.**

9 **So this Discord account in -- that**
10 **you created in 2020 is the only Discord account that**
11 **you've ever had in your name?**

12 A. I made another one after Ben that I have
13 now.

14 **Q. Okay. So let's refer to the first one**
15 **as your 2020 Discord account?**

16 A. Yeah.

17 **Q. And then the second one, when was that**
18 **created?**

19 A. I can look at my phone, if you want,
20 and --

21 **Q. I just need an approximate idea.**

22 MR. CAMARA: Objection; calls for speculation.

23 BY THE WITNESS:

24 A. I don't know. Maybe 2023.

25

1 BY MS. SCHLUMP PETERS:

2 Q. Okay. And for your 2020 Discord
3 account, did you ever give Ben your user name and
4 password so that he could access the account?

5 A. Not that I can remember.

6 Q. Okay. And when was that account
7 deleted?

8 A. A little -- the 2020 one?

9 Q. Yes, 2020.

10 A. A little after I broke up with him, a
11 week, maybe in September of 2022.

12 Q. Now, after your 2020 Discord account was
13 initially created, did you ever change your user
14 name or password?

15 A. Maybe the password. I -- 'cause
16 sometimes I forget my passwords, but I don't
17 remember when.

18 Q. Okay. But you do not -- do you recall
19 changing the user name?

20 A. No.

21 Q. So, [REDACTED] I'm going to show you --
22 it's a stack of documents, and these documents were
23 produced by the defendant in this case. They have
24 been Bates-stamped SB 1617 through SB 1919, and they
25 are all marked confidential.

1 **And taking a look at what is marked**
2 **as SB 1618, do you recognize this as Discord**
3 **messages?**

4 MR. CAMARA: Again, Ms. Peters, if you're
5 going to present the witness with a document, we
6 need to have a copy as well.

7 MS. SCHLUMP PETERS: You did say you had all
8 of these documents, but here is --

9 MR. CAMARA: I need a hard copy to reference,
10 please. Thank you.

11 Is this entire stack of hundreds of
12 pages being entered as an exhibit?

13 MS. SCHLUMP PETERS: I did not mark it as an
14 exhibit, no.

15 BY THE WITNESS:

16 A. What was the question?

17 BY MS. SCHLUMP PETERS:

18 **Q. So do you recognize this as a --**

19 MR. CAMARA: Excuse me, Joan, which -- which
20 page are you on right now?

21 MS. SCHLUMP PETERS: This is 16 --

22 THE WITNESS: 18.

23 MS. SCHLUMP PETERS: -- 18.

24 MR. CAMARA: Thank you.

25

1 BY MS. SCHLUMP PETERS:

2 Q. Do you recognize this as a Discord
3 exchange with the defendant Destiny?

4 A. It looks like Discord.

5 MR. CAMARA: Joan, I'm missing page 1618.

6 MS. SCHLUMP PETERS: What page do you have
7 there?

8 MR. CAMARA: 1617, goes to 1619.

9 MS. SCHLUMP PETERS: Let me see if this is --
10 it shouldn't be missing, but -- all right. Hand me
11 that one back and I'll -- actually, I need this, but
12 I'll give you 1618. Here you go. No, keep that.

13 MR. CAMARA: Thank you.

14 BY MS. SCHLUMP PETERS:

15 Q. So you said that you recognize this as a
16 Discord exchange?

17 A. Yeah.

18 Q. And did you have a Discord account with
19 the user name Rose?

20 A. No.

21 Q. No.

22 So when you refer to your 2020
23 Discord account, what name would have appeared here
24 for you?

25 A. I don't remember, but it wasn't Rose.

1 This -- just 'cause it says Destiny,
2 this is just the name that you can present, but
3 Discord actually gives you a longer name. So Rose,
4 it wasn't just Rose as the user name. That was just
5 the name that it can present to you as. So for
6 Discord you can -- it'll -- it could be like Rose
7 1234; but if you just want the name, it could just
8 be Rose.

9 **Q. Okay. And do you recognize, at least**
10 **from that page, any of those messages?**

11 A. No.

12 **Q. No.**

13 THE VIDEOGRAPHER: Can you move your
14 microphone up higher for me?

15 MS. SCHLUMP PETERS: Oh, sure.

16 THE VIDEOGRAPHER: Thank you.

17 BY MS. SCHLUMP PETERS:

18 **Q. So were you aware of a Discord account**
19 **that was created under the name Rose that was**
20 **communicating with Destiny?**

21 A. I thought that Ben was talking to
22 Destiny under his RoseOfTheGarden dis -- Discord, so
23 I didn't know if there was a new one created or not.

24 **Q. Okay. So this doesn't say**
25 **RoseOfTheGarden. It's just Rose.**

1 A. That's what I'm saying, is just because
2 it presents as Rose doesn't -- the full name on
3 Discord isn't always shown. So this could be
4 RoseOfTheGarden instead of just Rose, is what I'm
5 saying.

6 Q. Got it.

7 So were you aware, did Ben tell you
8 that he created a Discord account under the name
9 RoseOfTheGarden or Rose in which he communicated
10 with Destiny?

11 A. Yeah.

12 Q. Yes.

13 Did he share with you any of the
14 messages or videos or attachments that were
15 received?

16 A. Sometimes, yeah.

17 Q. Yes.

18 Did you ever have any access to that
19 account?

20 A. No.

21 Q. He never -- Ben never gave you login
22 credentials to that account?

23 A. No.

24 Q. So are you aware that excerpts from this
25 chat thread between Rose and Destiny were leaked on

1 **the Internet?**

2 A. Yeah.

3 Q. Yes.

4 **And when did you become aware of**
5 **that?**

6 A. When that Callum guy e-mailed me.

7 Q. Ben didn't tell you?

8 A. No.

9 Q. Are you also aware that a number of
10 **videos, sexually explicit videos were released on**
11 **the Internet from this account?**

12 A. Of me?

13 Q. No, not of you.

14 A. No.

15 Q. Okay. So you're not aware of the
16 **videos?**

17 MR. CAMARA: Objection; vague.

18 BY MS. SCHLUMP PETERS:

19 Q. Do you know who the plaintiff is in this
20 **case?**

21 A. No.

22 Q. Are you aware that the defendant in this
23 **case sent a sexually explicit video of himself and**
24 **the plaintiff to Rose on this Discord account that I**
25 **just presented to you the first page of the chat**

1 **thread?**

2 A. I was told that Destiny sent -- or,
3 like, sent blackmail porn of the Jane Doe to people
4 but I didn't know who.

5 Q. Okay. Did you ever see -- did Ben ever
6 share with you any of the videos that were sent by
7 Destiny on that Discord chat thread?

8 A. Like the videos of Destiny?

9 Q. Yes.

10 A. Sometimes.

11 Q. Okay. Do you have an idea of how many
12 videos Ben would have shared with you?

13 A. He didn't share with me very many. I
14 think I only saw probably a handful of videos that
15 Destiny sent.

16 Q. And now that you're aware of this case,
17 do you have an idea if you -- do you have any
18 knowledge of whether you saw the video that is at
19 issue in this case, which is the video of the
20 plaintiff and the defendant?

21 A. No.

22 Q. No.

23 Do you know if Ben shared any of the
24 videos that he received with other people?

25 A. Which videos?

1 **Q. Any of the sexually explicit videos he**
2 **received from Destiny.**

3 A. I don't know.

4 **Q. So in 2020- -- December 2024 after the**
5 **leaks occurred, a user on Kiwi Farms questioned why**
6 **you would have shared these videos and chat threads**
7 **in the leak in November 2024. And Solo replied: In**
8 **regards to why she's sharing it now, she isn't. She**
9 **gave me the account a while ago and told me I can do**
10 **whatever I want with it. So she doesn't really care**
11 **about stuff being leaked.**

12 MR. CAMARA: Objection; lacks foundation. You
13 appear to be quoting from something; but if there's
14 a document you are quoting from, please provide it
15 to the witness.

16 BY MS. SCHLUMP PETERS:

17 **Q. Is this an accurate statement?**

18 MR. CAMARA: Objection; vague and ambiguous.

19 BY THE WITNESS:

20 A. I don't get the question.

21 BY MS. SCHLUMP PETERS:

22 **Q. Okay. So Solo said that you gave him**
23 **the account a while ago. This was a statement in**
24 **December of 2024.**

25 A. What account?

1 MR. CAMARA: Same objections.

2 BY MS. SCHLUMP PETERS:

3 Q. The Discord account.

4 MR. CAMARA: Hearsay, lacks foundation, calls
5 for speculation. Again, if you're referring to a
6 document, please show the witness the document that
7 you're referring to.

8 MS. SCHLUMP PETERS: Your objection is noted.

9 BY MS. SCHLUMP PETERS:

10 Q. You can proceed to answer.

11 Did you give the account a while ago
12 to Solo?

13 A. No. There was no account to give him.

14 Q. Okay. Because you stated that it was
15 his account that he created --

16 A. Yeah.

17 Q. -- correct? Okay.

18 And did you ever tell him that you
19 don't care about stuff being leaked?

20 A. No.

21 Q. No.

22 Were you aware that he was going to
23 leak any of the videos or chat thread from the
24 Discord account before he did so?

25 A. No.

1 Q. No.

2 So he never asked for your
3 permission?

4 A. No.

5 Q. And your communication with Solo about
6 the leaks is only what you testified to earlier
7 regarding your communication on Instagram?

8 MR. CAMARA: Objection; vague and ambiguous,
9 lacks foundation.

10 BY THE WITNESS:

11 A. iMessage on Instagram?

12 BY MS. SCHLUMP PETERS:

13 Q. Yeah, I thought you said it was
14 Instagram that he reached out to you, Ben?

15 A. No, that's --

16 MR. CAMARA: Misstates prior testimony.

17 BY THE WITNESS:

18 A. This is -- that was Snapchat.

19 BY MS. SCHLUMP PETERS:

20 Q. Sorry, my mistake.

21 A. I didn't --

22 Q. Snapchat.

23 A. I didn't know about the leaks until the
24 Callum guy e-mailed me. So no, Ben never --

25 Q. Okay.

1 A. -- talked to me about that.

2 Q. And when was the first time
3 approximately that Callum reached out to you?

4 A. I don't remember. It's in here.
5 August 26th.

6 Q. August 26th of 2025?

7 A. Yeah.

8 Q. Okay. Did anyone else contact you about
9 the leaked materials after November of 2024?

10 A. After November 2024?

11 Q. Well, the leak occurred in
12 November 2024. Did anyone contact you about them
13 besides Callum?

14 A. No.

15 Q. No.

16

17

18

19

20

21

22

23

24 Q. Oh, okay.

25 A. But people were reaching out to me on

1 that and asking me if I was Rose, and so I had to
2 delete my Instagrams because people kept trying to
3 follow me. I had probably like 15 people try and
4 follow me over the course of a week.

5 **Q. And why would they have connected you**
6 **with Rose based on your Instagram account?**

7 A. I don't know. I heard that Destiny
8 tried to send a group of guys to find me because he
9 wanted to talk to me. That's what I heard from this
10 Callum guy. And so I think, like, my information
11 got leaked online and people were able to find my
12 Instagram somehow.

13 **Q. Is that in the chat, the e-mail thread**
14 **with Callum that Destiny was trying to get in touch**
15 **with you?**

16 A. Yeah, I think so. It might have been on
17 the first page.

18 [REDACTED] just,
19 like, online that I found that out.

20 **Q. And when you say "online," what forum**
21 **would that have been in?**

22 A. Twitter.

23 I -- when I found out about the --
24 the, like -- really, from what Callum e-mailed me
25 about, I didn't really know about the Pxie person.

1 I was more concerned about myself because my
2 address, a picture of my car, and everything got
3 posted online. And Destiny did that.

4 **Q. And Destiny?**

5 A. Destiny put my name and my address on
6 Twitter.

7 **Q. That's called doxxing; right?**

8 A. Yeah.

9 **Q. How did he have your name and address?**

10 A. I heard that --

11 MR. CAMARA: Objection; calls for speculation.

12 BY THE WITNESS:

13 A. I heard that --

14 MR. CAMARA: Assumes facts not in evidence.

15 BY THE WITNESS:

16 A. -- that --

17 BY MS. SCHLUMP PETERS:

18 **Q. Go ahead.**

19 A. -- he put together a group of guys in
20 Discord, that there was like a Discord chat that he
21 put together and wanted to find Rose, which was me,
22 I guess; and basically these people found out all
23 kinds of information on me as possible. Destiny
24 said that I went to [REDACTED] and I think
25 maybe my name and that I lived in [REDACTED], and so

1 these guys went out and tried to find me. And I
2 think that's all on Kiwi Farms, which was the place
3 that I got, like, mostly doxxed on, but --

4 **Q. Did you see any of these posts on Kiwi**
5 **Farms yourself?**

6 A. Yeah.

7 **Q. Did Discord, any administration or**
8 **administrator on Discord ever reach out to you about**
9 **the leak?**

10 A. No.

11 **Q. No.**

12 **Have you ever been contacted from**
13 **anybody in law enforcement?**

14 A. No.

15 **Q. Okay. When did you first become aware**
16 **of who Steven Bonnell is?**

17 A. I think probably in, like, December.

18 Ben really liked watching his
19 streams.

20 **Q. December of what year?**

21 A. '21.

22 **Q. '21.**

23 A. So he would want us to watch his streams
24 together or, like, YouTube channel.

25 **Q. So did you then start watching also?**

1 A. Mm-hmm.

2 Q. Yes?

3 A. Yeah.

4 Q. Did you follow Destiny on any of the
5 social media sites?

6 A. On YouTube.

7 Q. And what name -- under what name did you
8 follow him on YouTube?

9 A. I think it was just [REDACTED].

10 Q. Were there any other social media sites
11 that you followed Destiny on?

12 A. Not that I can remember.

13 Q. Have you personally had any
14 communications, direct communications with Destiny?

15 A. No.

16 Q. So looking at Exhibit 2, which is in
17 front of you, and page 5, there is a screenshot on
18 that page which I believe is a message on Twitter;
19 is that right?

20 A. Yeah.

21 Q. And can you tell us what the date of
22 that message is?

23 A. April 3rd.

24 Q. 2022?

25 A. Yeah.

1 **Q. Now, do you recognize this message?**

2 A. I mean, I got sent it by the Callum guy;
3 so yeah, I recognize it there --

4 **Q. Okay.**

5 A. -- from there.

6 **Q. So for this, you did not receive these**
7 **messages yourself on Twitter?**

8 A. No.

9 **Q. So this was not your Twitter account?**

10 A. No.

11 **Q. And then looking at page 7 of that same**
12 **exhibit, can you tell us what this is?**

13 A. Discord messages.

14 **Q. A Discord message?**

15 A. Yeah.

16 **Q. Yes.**

17 **And it's between Rose and Destiny;**
18 **correct?**

19 A. Yeah.

20 **Q. And just for the record, it's dated a**
21 **European date format, which would be July 30th,**
22 **2022; right?**

23 A. Yeah.

24 **Q. And this is a screenshot that you**
25 **provided?**

1 A. Yeah. This was given to me by Callum.

2 Q. Callum sent you this screenshot?

3 A. I'm pretty sure, yeah -- oh, wait. No,
4 no, no. Sorry.

5 This one, my friend, I asked my
6 friend -- pretty soon after I got told that I was
7 doxxed, I left all social media. So my best friend
8 was the one that -- was the one that was watching
9 online for things for me, and I asked her to send
10 me -- 'cause she told me that people found a date
11 that proved that it was in European date format; so
12 she found it for me on Twitter. This was posted on
13 Twitter.

14 Q. So she sent this screenshot to you on
15 Twitter?

16 A. No, not on Twitter. She sent -- she
17 took a -- she's on Twitter. She found it. She took
18 a screenshot; she sent it to me.

19 Q. Okay. But this is a Discord --

20 A. Yeah.

21 Q. -- message, okay, that she found on
22 Twitter?

23 A. Uh-huh.

24 Q. Okay.

25 THE REPORTER: Is that a yes?

1 BY THE WITNESS:

2 A. Yes.

3 MR. CAMARA: Objection; misstates prior
4 testimony.

5 BY MS. SCHLUMP PETERS:

6 Q. Did she save you any other -- send you
7 any other messages or chat threads that would be
8 relevant to this lawsuit?

9 A. No.

10 MR. CAMARA: Objection; vague and ambiguous.

11 BY MS. SCHLUMP PETERS:

12 Q. No.

13 Do you know -- is it your
14 understanding that Ben created the Twitter account
15 that we just looked at the screenshot of on what has
16 been Bates-stamped AH 5?

17 MR. CAMARA: Objection; calls for
18 speculation --

19 BY THE WITNESS:

20 A. Yeah.

21 MR. CAMARA: -- lacks foundation.

22 BY MS. SCHLUMP PETERS:

23 Q. Yes?

24 A. Yeah.

25 Q. And did he ask you for your permission

1 to create that account with your information?

2 A. No.

3 Q. Were you aware of the account?

4 A. Yeah.

5 Q. Yes.

6 Were you aware of videos being sent
7 back and forth on that Twitter account?

8 A. Yeah.

9 Q. Yes.

10 Now, you attended [REDACTED]
11 College; correct?

12 A. Yeah.

13 Q. Okay. And when did you start attending
14 [REDACTED] College?

15 A. I think it was 2021.

16 Q. Were you still in a relationship with
17 Ben when you started attending [REDACTED] College?

18 A. I started attending before I knew Ben.

19 Q. Okay. Do you know if your cell phone
20 number was ever given to the defendant, Destiny, in
21 this case?

22 A. No.

23 Q. You don't know or it was not?

24 A. I don't know.

25 Q. Okay. And you never spoke to him?

1 A. No.

2 Q. No.

3 Now, we discussed the chat thread on
4 Discord between Rose and Destiny and the fact that
5 videos were being sent by Destiny. Did you -- and
6 then you stated that Ben sometimes shared some of
7 those videos with you; correct?

8 A. Yeah.

9 Q. Did you -- what did you do with those
10 videos after he shared them with you?

11 A. I didn't do anything with them. He
12 would send them in Snapchat and then delete them.

13 Q. He would delete them?

14 A. Yeah.

15 Q. Okay. One second.

16 Now, are you aware that on this same
17 Discord account -- I'm going to call it the Rose
18 Discord account?

19 A. Okay.

20 Q. (Continuing.) -- [REDACTED]
21 [REDACTED]

22 A. [REDACTED]

23 Q. [REDACTED]

24 [REDACTED]
25 [REDACTED]

1 A. [REDACTED]

2 Q. Okay. Did you ever send those videos or
3 images directly on the Rose Discord account?

4 A. No.

5 Q. Okay. Can you just hand me back that
6 one page?

7 A. (Witness complies.)

8 Q. Thank you.

9 So I'm showing you what has been
10 marked as SB 1622. And if you look at the message
11 dated April 3rd, 2022, at 9:28 p.m., can you tell us
12 what that says?

13 A. You want me to read it?

14 Q. Sure.

15 A. The whole thing?

16 Q. No. Just that one message --

17 A. Which one?

18 Q. -- at 9:28 p.m. from Rose.

19 A. "Would you be down to call sometime?"

20 Q. Okay. So here Rose is offering to speak
21 to Destiny?

22 A. Okay.

23 Q. Excuse me?

24 A. Okay.

25 Q. Yes.

1 And did you ever tell Ben that you'd
2 be willing to speak to Destiny?

3 A. No.

4 Q. Okay. Any idea why he would have
5 written that?

6 A. Just 'cause I didn't give Ben consent to
7 do so something doesn't mean I didn't have to do it.
8 Ben would just make me do things whether or not I
9 wanted to or not.

10 Q. Okay. And -- all right. [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 A. [REDACTED]

15 MR. CAMARA: Objection; vague and ambiguous,
16 misstates prior testimony, compound.

17 BY MS. SCHLUMP PETERS:

18 Q. Ben never asked you to look at the
19 Discord account, the Rose Discord account?

20 A. He would screenshot pictures to send to
21 me sometimes of texts.

22 Q. Okay. And why would he do that?

23 A. I think he was bragging. [REDACTED]
24 [REDACTED]

25 Q. So let's look at page 1623. No. Sorry,

1 that's...

2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 Now, you testified earlier that Ben
9 never went to your home?

10 A. No, he didn't.

11 Q. [REDACTED]

12 A. [REDACTED]

13 Q. Okay. Is that something you told him?

14 A. Yeah.

15 Q. Okay. Now, so on -- I'm showing you
16 what's been marked as SB 1629, and if you could just
17 read to yourself the first few message exchanges.

18 Okay. So you read that?

19 A. Yes.

20 Q. And now -- so Destiny is telling you
21 here that he likes [REDACTED] correct?

22 A. Yeah.

23 Q. Okay. And then if you look at --

24 MR. CAMARA: Objection to the prior question.
25 Destiny wasn't telling her anything.

1 MS. SCHLUMP PETERS: Rose is the name on the
2 chat thread.

3 BY MS. SCHLUMP PETERS:

4 Q. So now if you look at 1631 and 32, and
5 if you look at the bottom of 1631, [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]

12 [REDACTED]
13 [REDACTED],
14 [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 A. [REDACTED]

18 Q. [REDACTED]

19 [REDACTED]
20 [REDACTED]

21 A. [REDACTED]

22 Q. [REDACTED] [REDACTED]

23 A. [REDACTED].

24 Q. [REDACTED]

25 [REDACTED]

1 A. [REDACTED]

2 Q. Then at what has been marked as
3 SB 1657 -- and I will show that to you. If you'd
4 look at Destiny's question to Rose April 5th, 2022,
5 at 7:58 p.m.: Do you get along with your family
6 pretty well?

7 And then Rose responds: I love them
8 and all but they're very annoying and a bit mean to
9 me.

10 Is that something Solo would write?

11 A. Yeah.

12 Q. Okay. So that's not something you would
13 have written?

14 A. No.

15 Q. Okay. Okay. I'm showing you what has
16 been marked as SB 1708, and at the top of the page
17 it's a message from you that says: [REDACTED]

18 [REDACTED]
19 Destiny responds, dated April 14,
20 2022, at 1:04 p.m.: Ooh.

21 And then Rose responds: [REDACTED]

22 [REDACTED]
23 And then Destiny responds: Yeah, at
24 some point, just let me know when you're normally
25 free.

1 At 1:05 p.m. [REDACTED] [REDACTED]

2 [REDACTED]

3 So are you testifying today that you
4 did not speak with Destiny?

5 A. I don't remember calling him, but no, I
6 never messaged him.

7 Q. Okay. You never messaged him. But did
8 you perhaps speak with him on Discord?

9 A. I honestly don't remember if I ever
10 called him, but I don't think I did.

11 Q. Would you be surprised if he produced
12 documents in this case that he did speak with you?

13 A. Yeah.

14 MR. CAMARA: Objection; asked and answered.

15 BY THE WITNESS:

16 A. Yeah.

17 BY MS. SCHLUMP PETERS:

18 Q. You would be surprised?

19 A. Yes.

20 Q. Yes.

21 Would you be surprised if you heard
22 that he produced documents saying that he spoke with
23 you for hours?

24 A. On call?

25 Q. On a -- on phone calls or Discord chat.

1 A. Yes.

2 Q. You would be surprised.

3 So you have no recollection of that?

4 A. No.

5 Q. Now, if you look at page SB 1771 -- hold
6 on. Here you go.

7 And this is dated July 21st, 2022,

8 [REDACTED].

9 [REDACTED] [REDACTED].

10 [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. [REDACTED] [REDACTED]

15 [REDACTED]

16 Q. So it was just a drawing, not a photo?

17 A. Yeah.

18 Q. Okay. Now, on what has been marked as
19 SB 1870, this message thread is dated August 31,
20 2022, and at 2:27 p.m. Rose says: My BF just broke
21 up with me. And then again at 2:28 p.m., you say:
22 I don't know. He told me he loved me, then blocked
23 me on everything.

24 So is that accurate that that would
25 have been the date that you and Ben split up?

1 A. 8 is August, right?

2 Q. Yes, August 31st, 2022.

3 A. Yeah.

4 Q. Okay. And your testimony is that you
5 did not send this message to Destiny?

6 A. I did not.

7 Q. Okay. And then on the next page, which
8 I did provide to you, is SB 1871, and on August --
9 still August 31st, 2022, at 2:45 p.m. Destiny asks:
10 Are you at home now or where are you at?

11 And Rose responds: Home [REDACTED]

12 [REDACTED]

13 A. Yeah, that wasn't me.

14 Q. That wasn't you.

15 [REDACTED]

16 A. [REDACTED]

17 Q. Mm-hmm.

18 Would Ben have known that that's
19 where you were?

20 A. No.

21 Q. So were you aware that Steven Bonnell
22 was having a relationship with a woman by the name
23 of Lauren?

24 A. No.

25 MR. CAMARA: Objection; relevance.

1 BY MS. SCHLUMP PETERS:

2 Q. So I'm showing you what has been marked
3 as SB 1910, and this chat thread is dated
4 April 13th, 2023. [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 And then Destiny responds at
8 12:45 p.m.: Hey, if you ever want to come to Miami,
9 just let me know. I can always pick up the ticket.

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 A. [REDACTED]
14 [REDACTED]

15 Q. But you had already broken up with him
16 at that point?

17 A. This is 4/13.

18 Q. 2023.

19 A. That's weird. Yeah, no, I didn't do
20 that. I was broken up with him by then.

21 Q. Okay. So that message was not from you?

22 A. No.

23 Q. And then on page SB 1918, this chat
24 thread is dated December 10th, 2023; and at
25 1:56 p.m. you respond to Destiny's question, you

1 **say: Family stuff.**

2 MR. CAMARA: Objection; misstates the
3 evidence.

4 BY MS. SCHLUMP PETERS:

5 **Q. And then Destiny states: Well, damn,**
6 **has it all turned out okay?**

7 Rose responds: Yeah, I'm living away
8 from them now so it's going better.

9 Destiny responds: Do you have any
10 new BF or roommates or anything, or are you just
11 completely on your own?

12 And Rose responds: You will laugh at
13 me but I'm living with my ex.

14 Was this true?

15 A. No.

16 **Q. No.**

17 A. I've only ever lived with my parents.

18 **Q. Okay. So you did not send that message?**

19 A. No.

20 **Q. Okay.**

21 MS. SCHLUMP PETERS: Okay. I have to pull
22 something up right now. Do you need a break, a
23 bathroom break or anything?

24 THE WITNESS: No.

25 MS. SCHLUMP PETERS: No? You're okay?

1 Just give me one second.

2 MR. SICHEL: I'm going to run to the bathroom
3 real quickly.

4 MS. SCHLUMP PETERS: Let's go off the record,
5 then, for a minute. Five minutes?

6 MR. SICHEL: Sure.

7 MS. SCHLUMP PETERS: Okay. Off the record.

8 THE VIDEOGRAPHER: Going off the record at
9 11:00 a.m.

10 (Recess taken from 11:00 a.m. to
11 11:07 a.m.)

12 THE VIDEOGRAPHER: We're record back on the
13 record at 11:07 a.m.

14 BY MS. SCHLUMP PETERS:

15 Q. So, [REDACTED] in a document that was marked
16 SB 2392 -- I don't have it here, it's on my laptop,
17 but it was produced by defendant and marked.

18 MR. CAMARA: Yeah, I'm going to object to the
19 use of an exhibit which has not been provided to
20 counsel for defendant.

21 MS. SCHLUMP PETERS: Yes, and you did say you
22 have all of the defendant's document production, so.

23 BY MS. SCHLUMP PETERS:

24 Q. At any rate, on this document --

25 MR. CAMARA: Are you going to provide the

1 document to the witness?

2 MS. SCHLUMP PETERS: Your objection is noted.

3 BY MS. SCHLUMP PETERS:

4 **Q. On this document that was produced by**
5 **the defendant, he is communicating --**

6 MR. CAMARA: Objection --

7 BY MS. SCHLUMP PETERS:

8 **Q. -- with somebody --**

9 MR. CAMARA: -- hearsay, lacks foundation.

10 BY MS. SCHLUMP PETERS:

11 **Q. -- and on November 29th, 2024, he**
12 **states, referring to Rose, that he had decent-length**
13 **phone calls with this person multiple times about**
14 **both of our personal things; never had a problem,**
15 **issue, fight over literally anything ever.**

16 A. I didn't do that.

17 MR. CAMARA: Same objections. The purported
18 document that plaintiff's counsel is relying on is
19 not in front of the witness. She cannot see the
20 document. So I would object to its use.

21 MS. SCHLUMP PETERS: Mr. Camara, your
22 objection is noted.

23 BY MS. SCHLUMP PETERS:

24 **Q. [REDACTED] so Destiny is saying that he spoke**
25 **with you multiple times --**

1 MR. CAMARA: Objection --

2 BY MS. SCHLUMP PETERS:

3 Q. -- hours long conversations.

4 MR. CAMARA: -- lacks foundation.

5 BY MS. SCHLUMP PETERS:

6 Q. Does this trigger your memory that maybe
7 you did speak to him on the phone?

8 A. When?

9 Q. It does not say when, but it must have
10 been --

11 MR. CAMARA: Objection; calls for speculation.

12 BY MS. SCHLUMP PETERS:

13 Q. -- prior to November 29, 2024, when he
14 stated this.

15 MR. CAMARA: Same objections; misstates the
16 evidence.

17 BY THE WITNESS:

18 A. I don't remember calling him ever.

19 BY MS. SCHLUMP PETERS:

20 Q. Is it possible that you did speak with
21 him and you just don't remember?

22 MR. CAMARA: Objection --

23 BY THE WITNESS:

24 A. I don't know.

25 MR. CAMARA: -- asked and answered.

1 BY THE WITNESS:

2 A. I -- Ben did not let me on to his
3 accounts 'cause he was talking to other women too.
4 He didn't want me on his account. He didn't trust
5 me with anything like that.

6 I don't remember talking to him ever
7 verbally.

8 BY MS. SCHLUMP PETERS:

9 Q. But you did state that Ben directed you
10 to [REDACTED]
11 [REDACTED] correct?

12 A. Yeah.

13 Q. Did he ever direct you to speak to the
14 defendant?

15 A. I don't remember that happening.

16 Q. You don't remember that.

17 Okay. So this 300-page, or more,
18 chat thread that was on Discord between Rose and
19 Destiny -- and I remind you that you are under
20 oath -- you didn't send any of these messages?

21 A. No.

22 Q. Not one?

23 A. No.

24 Q. Okay. [REDACTED]
25 [REDACTED]

1 [REDACTED] -

2 MR. CAMARA: Objection; leading.

3 BY MS. SCHLUMP PETERS:

4 Q. [REDACTED]

5 A. [REDACTED].

6 Q. Okay.

7 MS. SCHLUMP PETERS: Okay. I think I am just
8 about to wrap up, so I just need about five minutes.
9 And then I wanted to ask you, do you have an idea of
10 your timing in terms of your questioning?

11 MR. CAMARA: I can let you know after I speak
12 with Joel for a few minutes off the record.

13 MS. SCHLUMP PETERS: Okay. So let's just take
14 a 10-minute recess, and I will hopefully be wrapping
15 up after that. Does that sound okay?

16 THE WITNESS: Yes.

17 MS. SCHLUMP PETERS: Okay. So off the record.

18 THE VIDEOGRAPHER: Going off the record at
19 11:12 a.m.

20 (Recess taken from 11:12 a.m. to
21 11:27 a.m.)

22 THE VIDEOGRAPHER: We're back on the record at
23 11:27 a.m.

24 BY MS. SCHLUMP PETERS:

25 Q. Okay. [REDACTED] I remind you that you are

1 still under oath now that we are back on the record.

2 [REDACTED]

3 [REDACTED]

4 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 [REDACTED]

6 Q. Okay. Thank you.

7 And that would have been prior to
8 your breakup; correct?

9 A. Yes.

10 Q. And the Rose Discord account which you
11 stated that Ben had created, that would have been
12 with the user name [REDACTED]?

13 A. Yeah.

14 Q. Yes.

15 And what was Ben's e-mail address at
16 the time?

17 A. I don't think I had it.

18 Q. You never had it?

19 What about his phone number?

20 A. I didn't have it.

21 Q. Do you have any way of obtaining that
22 information?

23 A. He never gave it to me.

24 Q. Okay.

25 MS. SCHLUMP PETERS: Okay. I have no further

1 questions at this time.

2 CROSS-EXAMINATION

3 BY MR. CAMARA:

4 Q. Okay. Hi, Ms. [REDACTED] My name is Jake
5 Camara. I represent Destiny in this action. Thank
6 you for coming today. I'm very sorry that you've
7 been dragged into this, it seems like unnecessarily.
8 I want you to know that we're not here to get you in
9 trouble. You're not in trouble. We're just trying
10 to find out the truth. So all I need to know is
11 your true and correct answers to the best of your
12 ability.

13 So just to be clear, based on your
14 prior testimony, you've never spoken to Destiny
15 ever; correct?

16 A. No.

17 Q. You've never --

18 MS. SCHLUMP PETERS: Objection. Her testimony
19 was she did not remember.

20 BY MR. CAMARA:

21 Q. Did you -- have you ever corresponded
22 electronically with Destiny ever?

23 A. I don't remem- -- I never messaged him,
24 and I don't remember ever calling him.

25 Q. Okay. And you never spoke with Destiny

1 on Discord ever; correct?

2 A. Not that I can remember, no, on call.

3 Q. Destiny never sent you any explicit
4 material, did he?

5 A. No.

6 Q. Never?

7 A. Not me personally.

8 Q. And he never sent you explicit material
9 depicting the plaintiff in this case, certainly;
10 correct?

11 A. No.

12 Q. Do you even know who the plaintiff in
13 this case is?

14 A. No.

15 Q. Do you know who Pxie is?

16 A. No.

17 Q. Have you ever seen the video of Pxie?

18 A. No.

19 Q. So essentially Defendant Bonnell was
20 catfished by your boyfriend; correct?

21 A. Yes.

22 Q. What is your boyfriend at the time, Ben,
23 what is his real name?

24 A. I don't know. Ben is what he told me
25 his name was.

1 **Q. And he is Solo? Ben is Solo; correct?**

2 A. That's what he went by online, yeah,
3 Solo Leveling, but --

4 MS. SCHLUMP PETERS: Solo -- I didn't hear
5 that last part.

6 THE WITNESS: Leveling.

7 MS. SCHLUMP PETERS: Solo Leveling?

8 THE WITNESS: That's all I knew him from; so
9 I'm assuming this Solo guy that you guys are talking
10 about would be him.

11 MS. SCHLUMP PETERS: And how do you spell Solo
12 Leveling? Sorry, I know I'm -- I just want to
13 clarify for the record.

14 MR. CAMARA: That's okay.

15 THE WITNESS: Leveling, L-E-V-E-L-I-N-G.

16 BY MR. CAMARA:

17 **Q. [REDACTED]**

18 **[REDACTED]**

19 A. **[REDACTED]**

20 **Q. [REDACTED]**

21 **[REDACTED]**

22 A. **[REDACTED]**

23 **Q. And he didn't care?**

24 A. No.

25 **Q. I'm sorry you had to go through that,**

1 and I'm sorry that he put you in this position. I
2 really am. No child should have to go through that.

3 Do you have any way of contacting Ben
4 at this time?

5 A. No.

6 Q. Do you have any idea where he lives
7 aside from the fact that you believe he lives in
8 Oxford in the UK?

9 A. No.

10 Q. Okay. I just wanted to show you a
11 couple things based on what you have testified to
12 previously. It's already been marked as an exhibit.
13 It's Bates-labeled AH 005.

14 MS. SCHLUMP PETERS: Yeah, it's in that set.

15 MR. CAMARA: Here, I can give you a copy.

16 MS. SCHLUMP PETERS: I have it.

17 BY MR. CAMARA:

18 Q. Now, this correspondence is on Twitter;
19 correct?

20 A. Yeah.

21 Q. Do you know which Twitter account Steven
22 is corresponding with in this screenshot?

23 A. The RoseIs one.

24 Q. RoseIsCumming?

25 A. Yeah.

1 Q. And that, again, was not you?

2 A. No.

3 Q. And in this message, Steven messaged
4 that the person he believes he's talking to is
5 18 years old; right? You see that?

6 A. Yeah.

7 Q. Okay. So you're aware that Ben, or
8 Solo, was holding himself out as being above -- over
9 18 years old.

10 A. Yeah.

11 Q. Are you aware of that? Okay.

12 And just also so we're clear, was it
13 Ben who reached out to Destiny first?

14 A. I think so.

15 Q. I want to show you one exhibit we'll
16 mark as the next in order. It's SB 001639.

17 (█████ Exhibit Number 3 marked.)

18 MR. CAMARA: This will be marked as Exhibit 3.

19 BY MR. CAMARA:

20 Q. On the top of the page there's a message
21 from Destiny, and it says: Yeah, for sure, holy
22 damn, I'm super lucky you decided to message me.

23 Does that for you affirm that Solo
24 was the first person to contact Destiny and not the
25 other way around?

1 A. Yeah.

2 MR. CAMARA: All right. I would like to mark
3 this next exhibit as Exhibit 4.

4 ([REDACTED] Exhibit Number 4 marked.)

5 THE REPORTER: Do you want her to look at the
6 one I'm marking?

7 MR. CAMARA: It's okay.

8 BY MR. CAMARA:

9 Q. So this is a screenshot of the
10 @RoseIsCumming Twitter account. This is the Twitter
11 account we've been referring to; correct?

12 A. Yeah.

13 Q. All right. And you'll see in the bio it

14 [REDACTED]

15 [REDACTED]

16 A. [REDACTED]

17 Q. [REDACTED]

18 [REDACTED]

19 A. [REDACTED]

20 Q. [REDACTED]

21 A. [REDACTED]

22 Q. [REDACTED]

23 [REDACTED]

24 A. [REDACTED]

25 Q. Did you ever consider going to the

1 police about this guy Ben Solo?

2 A. I was scared.

3 Q. That's understandable.

4 If you go to the last page, there's a
5 photo that Solo posted, again, impersonating you.
6 Is that a photograph of you?

7 A. Yep.

8 Q. Okay. And, again, there in the bio it
9 says "18"; correct?

10 A. Yes.

11 Q. Okay.

12 MR. CAMARA: I'll mark this next one as
13 Exhibit 5.

14 (█████ Exhibit Number 5 marked.)

15 BY MR. CAMARA:

16 Q. This is another screenshot from that
17 same Twitter account with a tweet dated April 3rd,
18 2022.

19 Again, if you look at the bio, it
20 says that Solo is holding himself out as 18 years
21 old, pretending to be you; correct?

22 A. Yeah.

23 Q. But it also says, tip me two pounds or
24 three dollars -- with the dollar sign after the
25 three. Do you see that?

1 A. Yeah.

2 Q. (Continuing.) -- [REDACTED],
3 [REDACTED].

4 Now, do you believe he put two pounds
5 because he was located in the UK as you believe?

6 A. Yeah.

7 Q. [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 A. Yeah.

18 MS. SCHLUMP PETERS: I'm going to object as to
19 relevance to this case.

20 BY MR. CAMARA:

21 Q. Did he ever threaten you?

22 A. Yeah.

23 Q. What did he say to you, if you remember?

24 A. First time he started threatening me, he
25 threatened to kill himself; and then once it got

1 worse, he said that he'd kill my family and he would
2 come and kidnap me and use me as a sex slave.

3 Q. I'm very sorry to hear that.

4 Were you aware that Ben Solo was also
5 using a Cash App account with the user name
6 \$RoseIsCumming?

7 A. No. I didn't know he had Cash App.

8 Q. Does the name George Scorer mean
9 anything to you?

10 A. No.

11 Q. [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 Q. It wouldn't?

16 A. No.

17 Q. Okay. Again, you've never met Destiny;
18 correct?

19 A. No. [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

24 Q. Okay. And you don't know who Callum is?

25 A. No. I thought they were friends with

1 Pxie.

2 MR. SICHEL: Sorry, [REDACTED]

3 BY MR. CAMARA:

4 Q. [REDACTED]

5 A. [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 Q. You mentioned previously in your
9 testimony that you don't know who Callum is but that
10 you had responded to his e-mails that he sent you --

11 A. Yeah.

12 Q. -- correct?

13 I don't see any of your responses in
14 your production.

15 A. Oh.

16 Q. Do you have what you responded?

17 A. Yeah. I don't know really how to
18 forward the e-mail, so I didn't know if it got all
19 the e-mails forwarded to her or not.

20 Q. Okay. But you're in possession of
21 those --

22 A. Yeah.

23 Q. -- your correspondence with Callum in
24 its entirety?

25 A. Yeah.

1 Q. Okay. Sorry. Just one moment.

2 Have you spoken to plaintiff's
3 counsel at all prior to today, meaning Ms. Peters or
4 any of the other lawyers who represent the plaintiff
5 in this case?

6 A. I haven't, no. I guess I -- I sent her
7 e-mails of the stuff that she requested, but she
8 talked to my mom because when she e-mailed me, I
9 thought she was -- I didn't know if she was who she
10 said she was because Callum said that he was going
11 to pass my information along to her.

12 Q. To who?

13 A. (Indicating.) To Joan.

14 Q. Okay. And so you said your mom spoke
15 to --

16 A. Joan.

17 Q. -- Ms. Peters?

18 A. Yeah.

19 Q. Were you present for that --

20 A. No.

21 Q. -- phone call? Okay.

22 So you don't know what Ms. Peters and
23 your mom spoke about specifically?

24 A. They -- I think my mom just asked --

25 MS. SCHLUMP PETERS: Objection; hearsay.

1 BY THE WITNESS:

2 A. My mom just asked, like, why I have to
3 be involved in it. And I was confused because the
4 subpoena I got didn't have her name on it; and so
5 she asked her, like, why isn't your name on it if
6 you're the one -- if she's trying to e-mail me. And
7 just like how long this would be and stuff like
8 that.

9 BY MR. CAMARA:

10 Q. So when you were shown these Discord
11 chats with -- between Rose and Destiny today, you
12 had never seen them before in your life; is that
13 correct?

14 A. I saw the one that was, like, this one.
15 (Indicating.) Because I saw it -- oh, that's not
16 Discord.

17 Q. That's not Discord.

18 A. Discord, not those ones specifically,
19 no.

20 Q. But you had seen the one that you
21 produced; correct?

22 A. Yeah.

23 Q. And that is AH 007?

24 MR. SICHEL: In your production.

25 MR. CAMARA: It's not in there.

1 MR. SICHEL: Counsel, do you have a copy of
2 AH 007 --

3 MS. SCHLUMP PETERS: Oh.

4 MR. SICHEL: -- we could provide the witness?
5 This one is missing a copy.

6 MS. SCHLUMP PETERS: Sure. Let me find it.

7 It's in her copy.

8 BY MR. CAMARA:

9 Q. Okay. Do you see that?

10 MS. SCHLUMP PETERS: [REDACTED] you should have
11 it.

12 BY THE WITNESS:

13 A. Yeah.

14 BY MR. CAMARA:

15 Q. You got it. Okay.

16 So this one you are aware of, you've
17 seen before. Is that what you were saying?

18 A. Yeah. It was posted on Twitter.

19 Q. Okay. [REDACTED]
20 [REDACTED]

21 A. Yeah.

22 Q. Okay. And you mentioned before that
23 it's in European date format; right?

24 A. Yeah.

25 Q. It says 30/07/2022?

1 A. Yeah.

2 Q. And that makes sense to you -- right? --
3 because Solo was located in the United Kingdom?

4 A. Yeah.

5 Q. And so everything that was leaked would
6 have had time stamps in a European format; right?

7 A. Yeah.

8 Q. Okay.

9 MR. CAMARA: Anything else, Joel?

10 MR. SICHEL: No.

11 MR. CAMARA: I have no further questions.
12 Thank you.

13 MS. SCHLUMP PETERS: All right. I have a few
14 follow-up questions, [REDACTED] Sorry. It will just
15 take a couple minutes.

16 REDIRECT EXAMINATION

17 BY MS. SCHLUMP PETERS:

18 Q. Now, you said you had not, in response
19 to questions just now regarding whether you had ever
20 seen these Discord messages.

21 Didn't Ben send you screenshots of
22 these messages from time to time?

23 A. Some of them, but not those.

24 Q. None of the Discord messages? What
25 screenshots?

1 A. No, not the ones that you had me look
2 at.

3 Q. Oh, I see.

4 A. I didn't see those.

5 Q. But other Discord messages?

6 A. Yeah.

7 Q. Between Destiny and Rose?

8 A. Yeah.

9 Q. Okay. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 MR. CAMARA: Objection; leading.

13 BY THE WITNESS:

14 A. [REDACTED]

15 BY MS. SCHLUMP PETERS:

16 Q. [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 [REDACTED]

20 Q. [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 A. [REDACTED]

24 Q. [REDACTED] [REDACTED]

25 [REDACTED]

1 [REDACTED]
2 A. [REDACTED]
3 Q. Okay. [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 A. [REDACTED]
7 Q. [REDACTED]
8 [REDACTED]
9 A. [REDACTED]
10 Q. [REDACTED]
11 [REDACTED]
12 A. [REDACTED]
13 Q. [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED]
16 A. [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 Q. [REDACTED]
20 A. [REDACTED]
21 [REDACTED]
22 Q. [REDACTED]
23 [REDACTED]
24 A. [REDACTED] [REDACTED]
25 [REDACTED]

1 Q. [REDACTED]

2 A. Just because -- [REDACTED]

3 Q. Yes, I do.

4 A. [REDACTED]

5 [REDACTED]

6 Q. Okay.

7 A. [REDACTED]

8 [REDACTED]

9 Q. Okay. So you don't know if you [REDACTED]

10 [REDACTED]

11 A. Yes.

12 Q. Okay. [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 Q. [REDACTED] [REDACTED]

20 [REDACTED]

21 A. [REDACTED]

22 Q. [REDACTED]

23 MS. SCHLUMP PETERS: Okay. I have no further
24 questions.

25 MR. CAMARA: Just a couple follow-ups.

RECROSS-EXAMINATION

BY MR. CAMARA:

Q. Do you know if Solo goes by any other aliases online?

A. Yeah. E-L-O hero 5. I think that's all that I know of.

Q. Is that a Discord? Twitter?

A. That was his old Snapchat that I knew him from.

Q. Did Solo ever tell you why he was catfishing Destiny?

A. I think -- I don't know if he said specifically. I think it's just because he liked his content, like his streams and stuff. And he also -- Ben was bisexual, so I don't know if he would derive sexual pleasure from it or not.

Q. And Solo was a grown adult at this time -- right? -- in April 2022?

A. Yeah.

Q. How old was he? Do you know?

A. 21. 21 or 22.

Q. Okay.

A. But that's -- I don't know if he was older or not. That's just what he told me.

MR. CAMARA: I have no further questions.

1 MS. SCHLUMP PETERS: Thank you, [REDACTED] for
2 being here today and giving us your time and your
3 testimony. We appreciate it.

4 So we are going to go off the record
5 at 11:51, and this deposition is concluded.

6 THE VIDEOGRAPHER: Going off the record at
7 11:50 a.m. That concludes today's testimony of

8 [REDACTED]
9 (Discussion off the record.)

10 THE REPORTER: Are you ordering the transcript
11 today?

12 MS. SCHLUMP PETERS: I believe so, yeah. My
13 office usually takes care of that.

14 THE REPORTER: Do you need a copy of the
15 transcript?

16 MR. CAMARA: Yes, please.

17 FURTHER DEPONENT SAITH NAUGHT

18 (WHEREUPON the deposition concluded
19 at 11:56 a.m.)
20
21
22
23
24
25

DECLARATION UNDER PENALTY OF PERJURY

I, [REDACTED] do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on October 23, 2025; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

_____ correction sheet(s) attached.

Dated this ____ day of _____,
20____, at _____, Illinois.

[REDACTED]

DEPOSITION ERRATA SHEET

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Witness Signature

Date

Correction Sheet Page _____ of _____

1 STATE OF ILLINOIS)
) SS:
 2 COUNTY OF K A N E)

3 I, Amy K. Bateman, CSR, RPR, CRR, CRC, do
 4 hereby certify that the witness, [REDACTED], was
 5 duly sworn by me to testify the whole truth, and
 6 that the foregoing deposition was recorded
 7 stenographically by me and was reduced to
 8 computerized transcript under my direction, and that
 9 the said deposition constitutes a true record of the
 10 testimony given by said witness.

11 I further certify that the reading and
 12 signing of the deposition was not waived, and that
 13 deponent was notified, via U.S. Mail or Electronic
 14 Mail, of the availability of the transcript for
 15 review and signature. Pursuant to Rule 30(e) of the
 16 Federal Rules of Procedure, if deponent does not
 17 appear or read and sign the deposition within 30
 18 days, the deposition may be used as fully as though
 19 signed, and this certificate will then evidence such
 20 failure to appear as the reason for signature not
 21 being obtained.

22 I further certify that I am not a relative or
 23 employee or attorney or counsel of any of the
 24 parties, or a relative or employee of such attorney
 25 or counsel, or financially interested directly or
 indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my
 hand this 1st day of November, 2025.

Amy K Bateman

Illinois CSR License 84-003803



November 3, 2025

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

In Re: Jane Doe vs. Steven K. Bonnell II
Case Number: 1:25-CV-20757

Dear [REDACTED]

Attached is your transcript taken in the above-entitled cause. At the end of the transcript, there is a signature page with room for corrections.

Please review the transcript, making any changes necessary on the signature page. Then have the signature page and any corrections made signed. The signature on the signature page must be notarized.

After this process has been completed, please forward copies of the signed signature page with correction sheets, if any, to all counsel of record. Please also send a copy to me for my records.

If you have any questions regarding this procedure, please call me.

Sincerely,

Michelle R. Latimer, C.S.R.

cc: Ms. Joan Schlump Peters
Mr. Jake A. Camara
Mr. Joel Sichel