

1 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 -against-

6 KEITH RANIERE,

7 Defendant.

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8 TRANSCRIPT OF CRIMINAL CAUSE FOR TRIAL
9 BEFORE THE HONORABLE NICHOLAS G. GARAUFI
10 UNITED STATES SENIOR DISTRICT JUDGE
11 BEFORE A JURY

12 APPEARANCES

13 For the Government: UNITED STATES ATTORNEY'S OFFICE
14 Eastern District of New York
271 Cadman Plaza East
15 Brooklyn, New York 11201
BY: MOIRA KIM PENZA
TANYA HAJJAR
MARK LESKO
Assistant United States Attorneys

16 For the Defendant: BRAFMAN & ASSOCIATES
17 767 Third Avenue, 26th Floor
New York, New York 10017
18 BY: MARC A. AGNIFILO, ESQ.
TENY ROSE GERAGOS, ESQ.
- and -
19 DerOHANNESIAN & DerOHANNESIAN
677 Broadway, Suite 707
20 Albany, New York 12207
BY: PAUL DerOHANNESIAN, ESQ.
21 DANIELLE SMITH, ESQ.

22 Also Present: SPECIAL AGENT MICHAEL WENIGER
23 Court Reporter: TERI CARBY, PARALEGAL SPECIALIST
LINDA D. DANELCZYK, RPR, CSR, CCR
24 Phone: 718-613-2330
Email: LindaDan226@gmail.com

25 Proceedings recorded by mechanical stenography. Transcript
produced by computer-aided transcription.

1 (In open court; Jury not present.)

2 THE COURT: Please be seated.

3 (Defendant enters the courtroom.)

4 MS. PENZA: Moira Penza, Tanya Hajjar and Mark Lesko
5 for the United States. Good morning, Your Honor. Also with
6 us at counsel table is a Special Agent Michael Weniger of the
7 FBI.

8 THE COURT: Good morning.

9 MR. AGNIFILO: Good morning, Your Honor. Mark
10 Agnifilo, Teny Geragos, Paul DerOhannesian and Danielle Smith
11 is going to be entering this door probably in 30 seconds. And
12 we're here with Keith Raniere.

13 THE COURT: All right. Good morning.
14 Please be seated, everyone.

15 We have a couple of -- one of the jurors is a few
16 minutes late, so we may not get started at 9:30 precisely.
17 Not all of the jurors are here yet, but they don't have to be
18 here until 9:30.

19 So I have a couple of letters from the defense. I
20 have one letter regarding the file box issue.

21 Have you seen that?

22 MS. PENZA: We have, Your Honor.

23 THE COURT: And without going into the specifics of
24 what's in those particular objected-to items, are there
25 objections to the defense's view of admissibility as to the

1 items identified?

2 MS. PENZA: Let me just pull it out.

3 As to the one, Your Honor, the government is --

4 perhaps we should have a sidebar --

5 THE COURT: Yes, it's all right.

6 MS. PENZA: -- difficult to articulate it.

7 (Continued on the next page.)

8 (Sidebar conference.)

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1 (In open court; Jury not present.)

2 (Pause.)

3 (Whereupon, a recess was taken at 10:00 a.m.)

4 THE COURT: Are we all set?

5 MS. PENZA: Yes, Your Honor.

6 THE COURT: All right.

7 Let's bring in the jury.

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9 (Continued on next page.)

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1 (Jury enters the courtroom.)

2 THE COURT: Please be seated.

3 Good morning, members of the jury.

4 THE JURY: Good morning.

5 THE COURT: All right. Are we ready for the
6 witness?

7 MR. LESKO: Yes, your Honor.

8 THE COURT: Bring in the witness.

9 (Whereupon, the witness resumes the stand.)

10 THE COURT: Also Mr. Lesko, you may continue your
11 examination of the witness.

12 MR. LESKO: Thank you.

13 THE COURT: I remind the witness that he's still
14 under oath.

15 THE WITNESS: Yes, your Honor.

16 (Witness takes the witness stand.)

17 (Witness takes the witness stand.)

18 **MARK VICENTE**, called as a witness, having been previously
19 first duly sworn/affirmed, was examined and testified as
20 follows:

21 DIRECT EXAMINATION

22 BY MR. LESKO:

23 Q Good morning.

24 A Good morning.

25 Q We left off a couple of days ago with you discussing

1 events that occurred in the early part of 2017. Do you
2 remember that?

3 A I do.

4 Q In approximately March of 2017, did Sarah ask you to
5 obtain a letter from your wife?

6 A I believe it, I believe it was March.

7 Q What was your understanding of what of that letter was to
8 supposed to say?

9 A My understanding is the letter was some kind of an exit
10 letter, to basically have my wife say that she had no
11 outstanding ethical issues with the company. My sense was
12 basically to hold the company blameless for anything. And
13 that was the letter that she was -- I believe she tried to
14 call my wife and then tried to get me to influence my wife to
15 sign it.

16 Q Did your wife sign such a letter?

17 A I don't believe she did, no.

18 Q Did Sarah indicate to you that anyone asked her to
19 request this letter from your wife?

20 A After a number of attempts I did say to her, like, I know
21 somebody is asking you to do, this can you tell me who? You
22 are being told to do this, right? She said yes.

23 Q Also in the March 2017 time frame, do you recall taking a
24 walk with the defendant and him saying something strange in
25 connection with some principle comments?

1 A Yes. We were walking and I was beginning to have very
2 distant, at that point, doubts about him. And he said
3 something to me that sounded, you know, one of the usual
4 things that sounded very principle. And I said to him, well,
5 you could be a psychopath and say those exact same words. He
6 seemed to me to get very excited. And he said, well, I could
7 be. Let's say I am. And the whole discussion continued. To
8 me it was a strange response, his, what I perceived, as
9 excitement about it.

10 Q In that conversation did he mention anything about
11 protecting himself?

12 A I think it was that conversation potentially, towards the
13 end of it, he said to me something like, well, he prefaced it
14 with saying, you know you're trying to defend yourself too
15 much. You're worried about things happening to you.

16 And then, I don't recall, I think I said something
17 like, I think there are things in the world to defend against.

18 And he said to me a while later, there is nothing
19 you can do to hurt me. There is nothing you can ever do to
20 break me.

21 I was also a bit concerned about that. I wasn't
22 sure exactly what he meant by that.

23 Q During that same time period, March 2017, do you recall
24 another conversation with the defendant regarding who would
25 succeed him?

1 A Yes. We were having a discussion at the 21 Oregon Trail
2 residence, in what I called the sun room. Where I was
3 expressing to him, I think it was potentially time for me to
4 move on. And he said to me that he was hoping that I would be
5 the person that would take over the organization, that I would
6 take his place. And I said to him, something to the effect
7 of, I'm assuming you know that's not something I'm interested
8 in. I thought it was odd that he would suggest, you know,
9 that I would somehow lead the kingdom. It was very strange to
10 me.

11 Q In the same time frame, approximately March 2017, did you
12 make any decisions regarding where you would reside?

13 A Yes. We decided to close up the residence in Half Moon,
14 and just be in LA living full-time from that point. And then
15 the idea was that I would just continuing traveling backwards
16 and forwards for events and intensives.

17 Q Did you tell the defendant that you would wanted to move
18 full-time to Los Angeles?

19 A I believe I did.

20 Q Did you have a discussion with the defendant about the
21 executive board?

22 A I did. I told them that I thought it was time. I was
23 trying to resign from the executive board for over two years,
24 and I was asked every time to please stay. In one case it
25 would be too damaging if you left, or Pam Cafritz is dying,

1 it's not a good time.

2 Eventually I said to him, I think it is time I have
3 a replacement. I suggested that Omar Boone take my place, and
4 I suggest that I step down. He seemed open to the idea.

5 Q During that same time frame did you discuss this secret
6 society with the defendant?

7 A I did. I don't recall the exact sequence, but I had been
8 talking about something going on and my concerns. I know at
9 one point he asked, and it had to do with Allison Mack as
10 well, he said, is this something to do with the source? I
11 feel like don't know if has something to do the source, I know
12 it has to do with something, I don't know what it's connected
13 it with. I do have grave concerns. I recall saying in March,
14 saying to him, I don't know what is going on with you and all
15 these women, but I have deep concerns about this all blowing
16 up in some way that is bad. He said to me, well, I don't
17 think this will blow up; maybe other things will, but not
18 this. I thought, I don't know where to go from here. He's
19 not engaging me on what I'm concerned about.

20 Q At approximately the beginning of April of 2017, did you
21 travel to Vancouver, Canada?

22 A I did. I went to shoot a web series, a pilot web series,
23 with Anthony Ames and Sarah.

24 Q Without getting into the substance of the conversation,
25 did you have a conversation with Sarah about the secret

1 society?

2 A I did. I shared my concerns with her.

3 MR. LESKO: Your Honor, this may be an appropriate
4 time for an instruction regarding the conversation with Sarah.
5 Could we have a sidebar please?

6 THE COURT: Yes.

7 (Continued on the next page.)

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1 (Sidebar conference.)

2 THE COURT: Go ahead.

3 MR. LESKO: This is the second of the series of
4 discussions where Mr. Vicente is having discussions with
5 non-co-conspirators where he's acquiring information about the
6 secret society. Previously you've given a limited instruction
7 regarding the admissibility of these statements on the issue
8 of Mr. Vicente's state of mind and the effect on Mr. Vicente.

9 THE COURT: Not for the truth of the statement.

10 MR. LESKO: Yes.

11 THE COURT: I wanted to make sure. You can do that.

12 (End of sidebar conference.)

13 (Continued on the next page.)

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1 (In open court.)

2 THE COURT: Members of the jury, I'm going to advise
3 you that the statements which are being elicited as to the
4 remarks of someone other than Mr. Vicente are not being
5 provided to you for the truth of the matter asserted. They
6 are only being provided to you to elicit the state of mind
7 that was involved when the statements were made to
8 Mr. Vicente.

9 MR. LESKO: Your Honor, if I could suggest also the
10 effect on Mr. Vicente.

11 THE COURT: That's right. And also the effect that
12 they had on Mr. Vicente when he heard the remarks being made
13 to him. Go ahead.

14 MR. LESKO: Thank you, your Honor.

15 BY MR. LESKO:

16 Q So could you describe this conversation you had with
17 Sarah about the secret society?

18 A Yes. I told her what I knew at this point, that there
19 was some kind of society, that there was kind some of
20 blackmailing collateral involved, life-long vows involved.
21 That I was deeply concerned. That I didn't know what was
22 going on but I had grave concerns.

23 Her response I recall was something along the lines
24 of, well, if something like this existed then a person that
25 was involved probably couldn't talk about it, which I didn't

1 register until later.

2 Q What do you mean by register?

3 A We had another conversation, maybe three weeks later, the
4 same kind of conversation. When she said that particular line
5 again I finally got, oh, are you involved in this thing? But
6 at first it just went over my head.

7 Q Around this time period did you have a discussion with
8 someone named Kayla?

9 A I did.

10 Q Was that about the secret society?

11 A That was specifically about --

12 Q Let's hold off on the substance.

13 A It was about --

14 Q Involving the secret society?

15 A Yes.

16 MR. LESKO: Your Honor, we would ask for the same
17 instruction.

18 THE COURT: I'm permitting the witness to testify
19 about what certain other people said to him, including Kayla.
20 I'm allowing this because the statements of other persons are
21 relevant to Mr. Vicente's state of mind and their effect on
22 Mr. Vicente, but are not being offered for the truth of the
23 statements themselves. Therefore, you are to consider these
24 statements only to the extent that they had an impact on
25 Mr. Vicente's state of mind, and their effect on Mr. Vicente,

1 and not for the truth of the statements made by the other
2 party.

3 BY MR. LESKO:

4 Q So could you describe this conversation with Kayla?

5 A She told me that at a certain point she had seen a vow on
6 Allison Mack's computer. The vow was to Raniere vowing in
7 essence that she would never leave. And that if she ever did,
8 she would give up her any children she had to him and all her
9 possessions. So it was some kind of a life-long vow.

10 When I heard that from her I was extremely
11 disturbed. It was consistent with the kind of -- there were
12 vows involved in a lot of curriculum, this seemed extreme. Of
13 course I was very concerned.

14 Q Did this type of vow that you described, did it appear to
15 be different from the other vows that you were familiar with
16 in NXIVM?

17 A It was much more extreme. In essence giving up your
18 children, giving up all your worldly possessions. It
19 disturbed me.

20 Q During this time period, had your perspective on the
21 defendant changed?

22 A It was beginning to. Around April is when I finally
23 asked myself the question I was terrified to ask. I was
24 terrified because the whole system is the built around -- you
25 have to constantly what is called edify the leaders. You have

1 to speak well about them all the time. You have to build them
2 up in everybody's eyes as being these great people. It was
3 called edification. To not edify the leader was to be
4 dishonorable, in essence a bad person.

5 So I was at this point holding him still in some
6 sort of sacred place in my mind. This was the first time I
7 began wondering, what if based on the information I'm getting,
8 I'm hearing things that I believe are lies, and what if he's
9 not the person I think he is.

10 Q Lies from whom?

11 A From him. And I thought up to this point, I believed
12 that in all these years he would never lie to me. And I was
13 hearing lies and I was hearing very evasive.

14 So I began to, I had finally asked myself the
15 question, the most terrifying question, which is, what if he
16 is not only who he represents himself to be; but what if he's
17 the exact opposite? What if he is in fact evil. What if all
18 of this is a mask to do heinous things to other people. That
19 was pretty bad thing.

20 Q At this point in time did you question your continued
21 connection to NXIVM?

22 A I did. I couldn't -- I wasn't sure what to do. I was
23 still thinking maybe the education is okay. I was struggling
24 between maybe there is some grand purpose and reason to this
25 that I can't understand.

1 But there came a point where I was, I felt so
2 disturbed that I began realizing something is dreadfully
3 wrong. I'm trying to protect this picture in my brain of him,
4 that was part of the conditioning of the education so
5 strongly, when all common sense was saying to me you must ask
6 this question. What if none of this is what you think it is.
7 I was struggling with that.

8 I hadn't made the determination but I think the
9 crack began sometime in April when I allowed myself to ask the
10 question, the most the scariest question of all, which is to
11 question, in essence, the supreme leader.

12 Q You previously testified about a discussion with the
13 defendant involving Debra and the secret society and the
14 Facebook posts, did that discussion happen at around this time
15 frame?

16 A It was around this time frame, yes. I wanted to approach
17 him with these pieces of evidence that I was gathering and
18 check them out. And there were a series, I don't remember how
19 many, there were a series of conversations that happened that
20 just got more disturbing for me. One for instance was --

21 Q Let's be precise. Is this with the defendant?

22 A Yes, with the defendant.

23 Q Go ahead.

24 A With Mr. Raniere. One of them was about we had this
25 discussion before where he said to me, you know, your one of

1 your limitations your morality, your attachment to morality,
2 to good and bad. I said, I don't see that's a problem. He is
3 like, well, it could be a problem. It limits you in many
4 ways. I said, But morality is the thing I love the most about
5 myself. It is the thing -- I come from a country of such
6 horrific abuse, that it's something that I grew inside of me
7 as something very important. I think it's the best thing
8 about me. He said, There are limitations. The whole constant
9 dialogue about limitation to these things.

10 Then I was talking to him about like the ethicist
11 education that I thought was damaging people terribly. He was
12 saying things like, Things get worse before they get better.
13 I said, I don't see anyone getting better.

14 I began thinking to myself, why is he trying to make
15 me give up morality? Why? It doesn't make sense. I think
16 before I had thought maybe there is a grander morality to like
17 human morality. I thought to myself, maybe that's possible.
18 At this point I was thinking I don't think there is a grander
19 morality, just what is good and bad, what is abuse and what is
20 not.

21 At this point I got concerned. I began thinking, Is
22 he unhinged? Has he lost touch with morality and ethics and
23 everything? Is this part of some game?

24 And it was all these inconsistencies that began
25 bothering me. I realized like I was finally allowing myself

1 to ask the question, because inside the organization if you
2 had doubts, those were dealt with. If you had doubts you felt
3 it's bad that I'm having doubts, because I'm not honoring the
4 great leader, which the felt like a sin. I thought, No, no, I
5 need to start asking. I need to ask these questions, even if
6 it's pushing up against this don't-question-the-supreme-leader
7 feeling.

8 But I began having a lot of concerns. I still
9 didn't in my mind have a full sense of what I call a full
10 picture, but I knew more and more something was deeply wrong.
11 And the other thing is, I was, I had this gut feeling of
12 something really bad going on.

13 MR. AGNIFILIO: I'm going to object to that feeling
14 and move to strike.

15 THE COURT: Overruled.

16 A Gut feelings, we were taught, were a problem. Intuition
17 was a problem. They used the word viscera, the things you
18 feel in here, there is no data associated, there is nothing
19 proveable about feelings you're having.

20 And that's the animalistic part of you driving you.
21 You have to use logic. You have to use your mind to override
22 all these things.

23 And I began thinking, wait a minute, what if that's
24 not true. What if there is something about instinct. At that
25 point for me my instinct was screaming like something is

1 wrong. I decided to stop the program of it's bad that you're
2 feeling that. I decided to let it come out, let yourself
3 explore what is so terrifying to you right now. That's what I
4 was doing.

5 Q In approximately April 2017 did you participate in an
6 intensive?

7 A I did. We had an intensive scheduled in Los Angeles and
8 it was 11-day intensive. It was during the middle of the
9 intensive that all of these things I just described was
10 happening in the middle of the intensive.

11 Towards the beginning I was aware, there is a secret
12 society, and I think that some of the young women are in
13 danger. I spoke to some of people about their girlfriends, to
14 warn them. During the middle the intensive is when I began
15 having what I call recognitions.

16 Q Let me stop you for a moment. You said you warned
17 people, what did you warn them about?

18 A There were two of people that were my coaches and I
19 believed that their girlfriends had been approached for the
20 secret society. And I said to both of them, individually, I
21 said, You need to get your girlfriends away from Albany. You
22 need to get them away from these women that are trying to
23 enroll them in something. You need to protect them, they are
24 in danger.

25 Q I'd like to draw your attention to approximately May 20,

1 2017, do you recall having a discussion with Sarah on that
2 day?

3 A May 20, before my resignation, yes, I do.

4 Q Without getting into the substance, did you discuss the
5 secret society again?

6 A I did.

7 MR. LESKO: I don't know if we need the same
8 instruction, but the same instruction would apply.

9 THE COURT: All right. Members of the jury, I'm
10 permitting this witness to testify about what certain people
11 said to him.

12 And this is about Sarah?

13 MR. LESKO: Sarah, correct.

14 THE COURT: Including Sarah. I'm allowing this
15 because the statements of other persons are relevant to
16 Mr. Vicente's state of mind and their effect on Mr. Vicente.
17 But they are not being offered for the truth of the statements
18 themselves. Therefore, you are to consider these statements
19 only to the extent that they had an impact on Mr. Vicente's
20 state of mind and their effect on Mr. Vicente and not for the
21 truth of the statements. Go ahead.

22 BY MR. LESKO:

23 Q Describe your discussion with Sarah?

24 A I told her that I was going to resign. And that I was
25 going to leave everything. And resign from every single

1 position. I told her that based on what I was learning about
2 the secret society, I had deep concerns not only about the
3 morality of it but the legality of it. I had been working on
4 a project for an organization called CAST, which is the
5 Coalition to Abolish Slavery and Trafficking. I was
6 interviewing a number of trafficking victims just gathering
7 information as I was shooting. And I had decided to talk to
8 one of the liaisons with the LAPD.

9 Q Let me stop you there. Based on that discussion that
10 you're about to describe, did you have concerns about what was
11 going on?

12 A Very much, yes.

13 Q Could you share those? Did you share those concerns with
14 Sarah?

15 A Yes, I basically said, I think that something is going on
16 that could be illegal. I think it's a huge problem. And she
17 said to me, again I only realized it when she said it the
18 second time, Well, if somebody was involved in something like
19 what you're describing then probably they couldn't say
20 anything.

21 That's when the light bulb went off. I said, Have
22 you been invited into this thing? She just got very quite.

23 I realized -- so I began asking her what is going
24 on. She said that she had been invited in. That she was part
25 of it. And I said, Well, get out. She said, I can't. I

1 said, Why not? She said, Because they have too much on me. I
2 said, What do they have on you? She said, They have
3 confessions, recorded confessions, they have naked material,
4 and I'm trapped. And I said, Well, if the consequence of you
5 leaving is that all these things end up on the Internet, then
6 you better leave because what you're involved in is illegal
7 and you're complicit in this if you continue. This is
8 trafficking.

9 MR. AGNIFILIO: I'm going to object to the
10 characterizations.

11 THE COURT: It's overruled.

12 Q Just to be precise, this was your opinion or conclusion
13 that it was trafficking. This was not your -- your opinion
14 was not based on any legal advise?

15 A No, it was based on a discussion I had with the liaison
16 to the LAPD Task Force, but it wasn't legal advice.

17 That is when I pressed her more, because I felt she
18 was in danger. That's when she told me there were branding
19 ceremonies. She had been branded. I just was I was
20 horrified.

21 I just -- in essence, the walls just came tumbling
22 down. Oh, my God, this is what is really going on.

23 Q Did Sarah indicate whether she was sleeping well?

24 A She said she was exhausted. She was on standby all the
25 time. She had been trying to hide this from her husband, but

1 she was on permanent standby. She was exhausted. She was
2 being required to enroll other women; she was struggling with
3 it. She wasn't comfortable with some of the things she was
4 asked to do. And in essence she felt trapped.

5 Q Did she indicate that she answered to someone?

6 A She did. She said that she had a master. She explained
7 it was --

8 MR. AGNIFILIO: Your Honor, can we approach?

9 THE COURT: I'm sorry?

10 MR. AGNIFILIO: Could we approach?

11 THE COURT: No.

12 MR. AGNIFILIO: I object to this entire line, Judge.

13 THE COURT: Objection noted and overruled. Go
14 ahead. You may continue.

15 I'm sorry, what did you understand the term standby
16 to mean?

17 THE WITNESS: Much like in the Society of Protectors
18 Random Readiness, we were always on standby to receive a
19 signal day or night.

20 THE COURT: A signal.

21 THE WITNESS: A message from somebody higher up in
22 the chain.

23 THE COURT: Okay. Go ahead.

24 THE WITNESS: So my understanding was that this
25 secret society had implemented those same kinds of tools,

1 messaging tools.

2 Q You're talking about telegram?

3 A Telegram, yes.

4 Q Encrypted messaging?

5 A Encrypted messaging, correct. And she was just
6 exhausted. She was beginning to in essence feel unstable from
7 the lack of sleep.

8 Q Did she indicate, you mentioned she mentioned the term
9 master, did she indicate her status with her master?

10 A What I learned from her was that she was a master of
11 others and that she had a master above her. A lot of things
12 began to make sense as to why she was doing certain things or
13 asking certain things.

14 Q Did the status of the master above her have a name?

15 A The person had a name. I don't know if there was a --

16 Q Was the term slave used?

17 A Yes. So it was called a master/slave relationship. And
18 so she was a slave to a master, and then she was supposed to
19 be a master to other slaves below her, and she was supposed to
20 be getting other women to be slaves for her.

21 Q Did she indicate who her master was?

22 A She said her master was Lauren Salzman.

23 Q Did she send you anything related to her brand?

24 A She sent me numerous images of her brand at various
25 stages. I said, Why are they slightly, why are they

1 different? She said they were photographs of it overtime. I
2 asked why they existed. She said because we are supposed to
3 send it in to the master to show the progress of healing, I
4 suppose.

5 MR. LESKO: Your Honor, if we could activate the
6 Elmo please. And begin by just showing the exhibit to the
7 witness.

8 THE COURT: Go ahead.

9 BY MR. LESKO:

10 Q Showing you for identification Government's Exhibit 352,
11 do you recognize that exhibit?

12 A The image of the brand she sent me.

13 Q Is that one of the images that Sarah sent you after
14 May 20, 2017?

15 A Correct, yes.

16 MR. LESKO: We offer Government's Exhibit 352.

17 MR. AGNIFILIO: No objection.

18 THE COURT: Government's Exhibit 352 is received in
19 evidence.

20 (Government Exhibit 352, was received in evidence.)

21 THE COURT: Do you want me to publish it?

22 MR. LESKO: Yes, please.

23 BY MR. LESKO:

24 Q Do you recognize that brand?

25 A I do.

1 Q Could you explain?

2 A That is a combination of two initials.

3 Q I'm going to turn it counter clockwise?

4 A It's very hard to see it that way. Go another
5 180 degrees then you can see it.

6 Q Okay, I turned it.

7 A So it's backwards, it's flipped left to right right now.
8 But that's the K over there and that is R over there. And
9 then there is another set of initials in there as well.

10 I had a discussion with Sarah. This seems
11 consistent with the kind of symbology by Raniere and Marianna
12 that has more than one meaning usually. So I identified
13 another set of initials in there as well.

14 Q Did you discuss leaving the secret society with Sarah?

15 THE COURT: Are you done with that exhibit?

16 MR. LESKO: Yes, I am.

17 A I did. That was part of my, "I think this is illegal,"
18 that was part of the discussion. I said, you must leave. You
19 must get out. I don't know how far this goes or how big it
20 is. I think it's a huge problem.

21 Q Did you advise her regarding the release of her photos?

22 A My suggestion was that she make peace with those things
23 being released. That even though she may be afraid about
24 things that would come out, that it was better than staying
25 involved in something that she was trapped in. Because my

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1 understanding, when I said just leave, she said there is so
2 much blackmail collateral material on me it would be very,
3 very hard. I said, But not impossible. You have to make
4 peace with it. So maybe your naked body is going on the
5 Internet, fine. Make peace with it.

6 And there was supposed to be these confessions she
7 made about things that were not true about her family, that
8 was part of the blackmail material. I said, Just tell them
9 that you did this. Tell them that you were forced to lie
10 about something that is not true. And that if it comes out on
11 the Internet or whatever that it's a lie and just apologize
12 now.

13 Q Did Sarah share the actual name of the secret society at
14 this time?

15 A She shared a name that didn't make sense to me. She said
16 something Latin, I don't recall the exact name. Later I heard
17 the name but I don't recall. I think she said Dominus
18 something, Dominus over something, but at that time I didn't
19 know the actual name.

20 Q Did she share an acronym?

21 A DOS.

22 Q Is that the first time you learned of the term DOS?

23 A That is the first time. I heard other terms. I heard
24 the Agency. I think I heard Vow. But this is the first time
25 I heard DOS.

1 Q A few days later did you communicate something with
2 respect to NXIVM?

3 A I sent three letters of resignation. One to the
4 executive board, one to the leaders of the Society Of
5 Protectors, and one to the greens, the senior proctors. I
6 CCed Raniere, Nancy Salzman and I believe Clare Bronfman on
7 all of them, I believe.

8 Q Were these letters all basically the same in substance?

9 A Pretty much the same. It was nothing too substantial. I
10 was incredibly afraid. My realization at that point was that
11 there was this group of people that had blackmail over them
12 that would do anything for their master. So I realized my
13 life could be in physical danger, my wife's life, my mother's
14 life. Because they were, you know, in someway they were like
15 terror cells.

16 MR. AGNIFILIO: I object.

17 THE COURT: Sustained on that.

18 MR. AGNIFILIO: Move to strike.

19 THE COURT: The jury will disregard the last comment
20 about terrorist cells.

21 Q Did you include in these resignations letters an
22 explanation why you were resigning?

23 A I did. I didn't want to set any alarm bells off. I felt
24 I was in danger. I said, I'm going to do my career now, the
25 thing I want to do for a long time. That's what I was going

1 to do.

2 Q Was that true?

3 A It was half true. I was just deeply disturbed at that
4 point. Of course that is what I want to do, but I realized I
5 had to have some, there was no way I was going to say, I
6 discovered there is some horrible slave/master thing going on,
7 and it's morally objectionable. I wasn't going to say any of
8 that. Because that would just release, I don't know what, on
9 me. I had an understanding of the way the organization worked
10 and the resources, and I believed my life is now in danger.

11 Q Did you contact Clare Bronfman and ask her to do anything
12 in connection with your resignation?

13 A I did. I contacted her and the IT department. I said to
14 them, please revoke all my access to any computerized system,
15 pull my -- cut me off from are the database, disconnect my
16 e-mail addresses, disconnect everything. I had to do that
17 twice; it didn't happen at first.

18 Q Why did you make that request?

19 A Because I believed that was one of the traps they would
20 use. I began to understand, I was reading more and more now
21 and realizing, oh, so I could get framed for something. And I
22 likely will.

23 One of the ways I believed I would be framed is that
24 I would some how illegally be accessing something. I thought
25 as a preventive measure let me say disconnect me from

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1 everything. Then if you say I'm accessing something, then
2 clearly there is a problem.

3 Q Around this time did you become aware of a planned
4 branding ceremony to be held in Albany?

5 A I did. There was one going to be held in the beginning
6 of January. I began understanding that a number of women were
7 going to be branded at that ceremony.

8 Q January or June?

9 A Sorry, June.

10 Q Was that in connection with a NXIVM event that was held
11 about that time?

12 A There was a, I believe it was a coach summit that was
13 going to happen, I think three or four days. So my
14 understanding was during that coach summit there would be a
15 branding ceremony.

16 Q Did you learn the names of individuals who were to be
17 branded in --

18 A I learned the names of some of them, yes.

19 Q Was someone named Charmel to be branded?

20 A Yes.

21 Q Someone named Rachel?

22 A I believe so.

23 Q Someone named Valerie to be branded?

24 A Yes.

25 Q Did you do anything to stop these three from attending

1 the branding ceremony?

2 A I did.

3 Q Did you go to someone named Catherine's house?

4 A I did.

5 Q What happened there?

6 A Well, originally I had gone to speak to Catherine to
7 share my concerns about her daughter because I believed her
8 daughter was involved in this. And I had said to her, She
9 needs help, she's in danger. We need to get her out.

10 So we were having that conversation. And it was
11 around that time I believe that I learned about the branding
12 ceremony. We were at her house actually and began making a
13 series of phone calls trying to do certain things to make sure
14 that either the women would not go, or they would leave as
15 soon as they could.

16 Q Did you have a discussion with Charmel about your
17 concerns?

18 A I did.

19 Q Do you know someone known as J?

20 A Yes.

21 Q Who is J?

22 A J was a participant in the NXIVM programs in Los Angeles
23 and somebody who I then learned had been part of the secret
24 society, part of DOS. And J shared with me information which
25 disturbed me even further.

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1 Q I'm showing you what is admitted as Government's Exhibit
2 32, do you recognize that photograph?

3 A I can only see it on that screen.

4 THE COURT: Sorry.

5 A Yes, that is J.

6 Q Is J an actress?

7 A Yes.

8 Q A model?

9 A Yes.

10 Q Did you discuss collateral with J?

11 A Yes, I did. I learned more about the collateral. And
12 then J said to me that she was --

13 Q If could you stop there for a second. Your Honor, if we
14 could have an instruction?

15 THE COURT: I'm going to give the same limiting
16 instruction. I'm permitting this witness to testify about
17 what J said to him. I'm allowing this because the statements
18 of J are relevant to Mr. Vicente's state of mind and their
19 effect on Mr. Vicente, but they are not being offered for the
20 truth of the statements themselves. Therefore, you are to
21 consider these statements only to the extent that they had an
22 impact on Mr. Vicente's state of mind and their effect on
23 Mr. Vicente and not for the truth of the statements that are
24 being testified to regarding statements of J.

25 BY MR. LESKO:

1 Q You may continue.

2 A J told me that she was in possession of collateral
3 material of some of the people in her, I guess, pod. I said
4 to her would she mind passing it along to me because I likely
5 will want to take it to the authorities. She then passed it
6 along to me. I said, I'll keep this safe.

7 I was just also concerned that something would
8 happen to these girls. So I wanted to make sure that somebody
9 had the material.

10 Q So she sent you this collateral that you referred to?

11 A She did.

12 MR. LESKO: If we could publish this to the witness,
13 your Honor?

14 THE COURT: Sure, go ahead.

15 Q I'm going to show you what is marked for identification
16 as Government's Exhibit 446, it consists of four pages. Let's
17 start with page one, do you recognize page one of Government's
18 Exhibit 446?

19 A Yes.

20 Q What is page one?

21 A It is --

22 Q Actually, do you recognize that as the part of the
23 collateral that J sent you?

24 A Yes, I do.

25 Q Was that in the May or June 2017 time frame?

1 A I believe this was the end of May.

2 Q Let's look at page two of Government's Exhibit 446, do
3 you recognize that page?

4 A I do.

5 Q Is that part of the collateral?

6 A It is -- well, no, it's not part of the collateral. It's
7 part of the materials that she gave me related to the
8 collateral.

9 Q Thank you. Showing you page three of Government's
10 Exhibit 446, is that also part of the materials that J sent
11 you?

12 A It is.

13 Q Last page on Government's Exhibit 446, is that another
14 page of materials that J sent you?

15 A It is.

16 MR. LESKO: Your Honor, if I could have just a
17 moment?

18 THE COURT: Yes.

19 MR. LESKO: The Court's indulgence for just a
20 moment. If I could just show counsel the exhibit?

21 THE COURT: Please.

22 MR. LESKO: We seek to admit 446.

23 MR. AGNIFILIO: No objection.

24 THE COURT: All right, Government's Exhibit 446 is
25 received into evidence.

1 (Government Exhibit 446, was received in evidence.)

2 BY MR. LESKO:

3 Q Let's start with first page, can you describe what that
4 first page is?

5 A Yes. That is a server, online server, called Dropbox,
6 Dropbox is a depository for documents, videos, audio, anything
7 you want to keep in a cloud. It synchs with your computer.

8 So that is somebody's Dropbox account and those are
9 folders. You look -- could you zoom in slightly? You can see
10 there are two folders there. One says brands, one says
11 workout. And with brands there are eight members. That means
12 that there are eight members with individual e-mail addresses
13 that have accounts that have access to that particular folder.
14 So in essence, anything that goes in that folder all eight
15 people have access to. They either have access to only read
16 or they can read or they can make changes. I'm not sure at
17 this point how many had the ability to change things.

18 Q Okay. I'm going to show you the second page, could you
19 describe what that second page shows, if you know?

20 A Those are the, at the very top, it says collateral.
21 There is a little folder with two people, that means it's a
22 shared folder. It says eight members. And these are the
23 actual members that have access to that particular folder of
24 materials. And you can see on the right the owner of that
25 folder. The owner and the creator of the folder is Allison

1 Mack. You can see the other members can edit, which means
2 they can look at and also add things or subtract things.

3 Q Page three, describe that?

4 A That appears to be additional members that have access to
5 what I just described.

6 Q Page four?

7 A That is an example of an invitation. If you invite
8 somebody to a folder, then Dropbox sends a form letter like
9 that with a memo. So this was sent to India who is invited to
10 edit the folder -- sorry. This was from India inviting, I
11 believe it was J, to edit the folder. And it says in the memo
12 section, "India said here is your file to upload collateral.
13 Once it's uploaded it will be taken offline."

14 MR. LESKO: If we could just publish the next
15 exhibit to the witness initially?

16 THE COURT: All right.

17 Q Mr. Vicente, showing you what is marked for
18 identification as Government's Exhibit 447, do you recognize
19 Government's Exhibit 447?

20 A This is a legal document --

21 Q Without getting into what it is, do you recognize this as
22 being part of what was sent to you by J?

23 A I do.

24 MR. LESKO: Your Honor, we admit Government's
25 Exhibit 447.

1 MR. AGNIFILIO: One second, Judge.

2 THE COURT: You want to just enlarge it so it can be
3 ready more easily?

4 MR. AGNIFILIO: I object, your Honor.

5 THE COURT: Well, my college languages don't permit
6 me to understand what this is. Why don't we have a sidebar.

7 (Continued on next page.)

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1 (The following occurred at sidebar.)

2 THE COURT: Yes, I don't know what it is, so.

3 MR. LESKO: I don't believe Mr. Vicente knows what
4 this is. I'm just going to simply ask as to -- a question as
5 to whether this was material received and that's it. I just
6 want to admit the document we're actually going to have J
7 testify about the document.

8 THE COURT: You mean you want to admit it subject to
9 connection?

10 MR. LESKO: Actually, we want to admit it as
11 material he received and then we will connect it, but I don't
12 think it is subject to --

13 THE COURT: I see.

14 MR. LESKO: We will connect it to J's explanation.
15 And just so Your Honor understands, this is some Mexican --
16 some legal process that was provided to J in connection with
17 her involvement with NXIVM and DOS. It's sort of like a
18 called a legal summons or something like that from Mexico.

19 THE COURT: You going to provide a translation of
20 it.

21 MR. LESKO: I believe we will, yes.

22 MR. AGNIFILO: So my just thinking out loud, because
23 I don't to hold things up, if you put J on, just admit it
24 through her. My objection is admission of a document put into
25 evidence without any of us knowing what it actually says

1 without the witness who received it.

2 So I have no problem with introducing it for
3 identification, and if J's going to testify, I think it's
4 utterly admissible.

5 MR. LESKO: That's fine.

6 THE COURT: Just get him to indicate that it was
7 provided to him. He identified it and then we will put it in
8 with the other person, and, you know, we know the source.

9 MR. AGNIFILO: Yes.

10 MR. LESKO: Well, if I could suggest this, sort of
11 backtracking.

12 I actually think then we could admit subject to
13 connection so that there's no confusion with the jury that
14 this is going to be connected later through another witness.
15 And then it's in evidence. I mean, it really doesn't matter
16 either way.

17 THE COURT: Well, let me -- I'm going to allow that,
18 but if it doesn't -- if there isn't testimony by J in
19 connection with it, I'll strike it.

20 MR. LESKO: Very, well.

21 THE COURT: But it's in Spanish, so I don't think --
22 I mean, maybe there are a few people on the jury who can speak
23 Spanish. They are going to see it for about ten seconds just
24 now.

25 MR. LESKO: That's fine.

SIDEBAR CONFERENCE

1013

1 THE COURT: All right. Doesn't have to be sealed.

2 MR. AGNIFILO: I don't think so.

3 (End of sidebar conference.)

4 (Continued on the next page.)

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VICENTE - DIRECT - MR. LESKO

1014

1 (In open court; Jury present.)

2 MR. LESKO: We'll just publish to the witness.

3 Your Honor, we'd offer Government's Exhibit 447

4 subject to connection.

5 MR. AGNIFILO: No objection subject to connection.

6 THE COURT: Subject to connection, yes.

7 447. Government's Exhibit 447 is received subject
8 to connection and publish to the jury.

9 (Government's Exhibit 447, was received in
10 evidence.)

11 (Exhibit published.)

12 BY MR. LESKO:

13 Q And without getting into any of the details, I don't know
14 if you know Spanish or not --

15 A Not well enough.

16 Q Is that a letter in Spanish, essentially?

17 A Yes.

18 Q And it's addressed to J?

19 A Yes.

20 Q Okay.

21 THE COURT: Okay. Next.

22 MR. LESKO: Your Honor, with respect to this
23 exhibit, may I approach the witness and show the witness at
24 the witness stand?

25 THE COURT: Sure.

VICENTE - DIRECT - MR. LESKO

1015

1 MR. LESKO: Okay. I'll show counsel first.

2 THE COURT: Counsel first.

3 BY MR. LESKO:

4 Q Mr. Vicente, I'm initially going to show you Government's
5 448, which is four pages of photographs.

6 Without describing what they depict, do you
7 recognize Government's Exhibit 448?

8 A I do.

9 Q Are those photographs that J sent you?

10 A They are.

11 Q Okay. And now I'm going to show you Government's
12 Exhibit 448R, the letter R.

13 If you could review those photographs.

14 (Whereupon, the witness is reviewing the document.)

15 Q Is that -- are the photographs in Government's 448
16 redacted or pixelated or blacked-out versions of the original
17 photographs in Government's 448 --

18 MR. LESKO: I'm sorry, strike that.

19 Q Are the photographs included in Government's 448R
20 redacted, pixelated or blacked-out versions of the original
21 photographs that are contained in Government's Exhibit 448?

22 A They are.

23 Q Okay.

24 MR. LESKO: And, Your Honor, we'd offer Government's
25 448 and Government's 448R.

VICENTE - DIRECT - MR. LESKO

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1 MR. AGNIFILO: No objection.

2 THE COURT: All right. Government Exhibits 448 and
3 448R are received in evidence.

4 (Government's Exhibit 448 and 448R, were received in
5 evidence.)

6 MR. LESKO: Your Honor, we'd ask that these images
7 just be published to the jury.

8 THE COURT: All right.

9 MR. LESKO: And the Court, obviously.

10 THE COURT: And I'm sorry, and what?

11 MR. LESKO: I'm going to publish these redacted
12 versions, the four photographs in Government's 448R. But we
13 ask that these images only be published to the jury, the
14 Court, and counsel.

15 THE COURT: All right. And I just ask that the jury
16 tilt their screens toward the witness box, not all the way,
17 but just -- he has a screen as well.

18 And your screen is off.

19 MR. LESKO: For the record, my screen is turned off,
20 yes.

21 THE COURT: All right. Okay. Just a moment.

22 MR. LESKO: And I believe the screens at the various
23 counsel tables are all oriented in a manner that they cannot
24 be seen by the folks in the galley.

25 THE COURT: That's fine.

VICENTE - DIRECT - MR. LESKO

1017

1 MR. LESKO: May I proceed, Your Honor?

2 THE COURT: Yes, you may.

3 BY MR. LESKO:

4 Q Okay. I'm going to start with Government's Exhibit 448R,
5 the first page.

6 Could you describe that photograph? That redacted
7 photograph, I should say.

8 A It is a picture, I assume, taken by her of herself. The
9 camera is down below with her crotch in the foreground, and
10 her face visible in the background. And it's pixelated.

11 THE COURT: And the individual is in the reclining
12 position.

13 THE WITNESS: She appears to be lying down and her
14 legs seem to be spread apart as well.

15 THE COURT: Next.

16 Q Do you recognize who that is it in that photograph?

17 A I do.

18 Q Who is that?

19 A Danielle.

20 Q I'm going to show you the second page -- I'm sorry,
21 second page of Government's 448R.

22 Do you recognize that photograph?

23 A I do.

24 Q Could you describe it please.

25 A This is a similar photograph. A young woman taking a

1 picture of herself. Her legs are spread wide open, with her
2 crouch in the foreground. You can see her face in the
3 background.

4 I believe she's standing with her legs spread apart,
5 and I do recognize the individual.

6 Q And is that individual nude in that photograph?

7 A Yes.

8 Q Okay. And who's that individual?

9 A Michele.

10 Q I'm going to show you the third page of Government's
11 448R.

12 Do you recognize that photograph?

13 A Yes. That's the -- that's the same person, Michele. She
14 appears to be lying down. She is now holding the camera up
15 above her. Her legs are spread open. She's naked. And she's
16 making a face towards the camera of some kind.

17 Q And that's Michele?

18 A That's Michele.

19 Q Next Government's -- last page of photographs
20 Government's 448R.

21 Do you recognize -- are there two photographs on
22 that page?

23 A There are two photographs.

24 Q And who are they of?

25 A Again, Michele. The one on the left, she appears to be

1 standing. It's the same kind of position. She's naked.
2 She's -- her legs are wide open. And it shows her crotch and
3 her face and body.

4 In the second image also of her, she appears to be
5 seated. The camera lowered down with her crouch in the
6 foreground, and her face in the background.

7 Q At the end of May 2017, did you initiate any attempts to
8 contact law enforcement about NXIVM?

9 A I did.

10 Q What did you do?

11 A I was trying to find a trusted person in the FBI in the
12 Northern District in Albany to talk to. So I went through
13 somebody else who had a friend who is a trusted DEA agent to
14 find a person I could talk to in the FBI.

15 They found a special agent and then the special
16 agent called me to begin the conversations.

17 Q Did you eventually learn of an incident that occurred at
18 the coach summit in June 2017 involving Sarah's husband?

19 A Oh, I did learn that -- that he -- he didn't know about
20 any of this, and when he finally found out, he was very upset
21 and he went to the coach summit, which I believe was being
22 held at Apropos, and to basically confront Lauren Salzman and
23 Jim Del Negro. D-E-L, N-E-G-R-O.

24 Q After May 22nd, 2017, the date of your resignation, did
25 you ever participate in another NXIVM program?

VICENTE - DIRECT - MR. LESKO

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1 A I did not.

2 Q Let's go back in time a bit to the end of October 2012.

3 Do you recall participating in an audiotaped meeting
4 with the defendant about SOP?

5 A October?

6 Q October 2012?

7 A Yeah. Yes. Yes.

8 Q Okay. I'm showing you what's been marked --

9 A I can't see it.

10 MR. LESKO: Oh, you can't see it?

11 THE COURT: Now?

12 THE WITNESS: Not yet.

13 THE COURT: I'm sorry. Is this just for the
14 witness?

15 MR. LESKO: For now, yes, Your Honor.

16 THE COURT: All right. Thank you.

17 Can you see it now?

18 THE WITNESS: I do.

19 THE COURT: Okay. Go ahead.

20 A Yes, I recognize that.

21 Q And for identification purposes, that's been marked as
22 Government's Exhibit 1002.

23 What is 1002?

24 A I don't know what 1002 -- oh, sorry, now I understand the
25 question.

VICENTE - DIRECT - MR. LESKO

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1 That is a CD of have that audio recording which I
2 signed on the 6th of May.

3 Q You've reviewed that audio recording?

4 A I have.

5 Q And it truly and accurately reflects the audiotape of the
6 discussion that you had with the defendant and others on
7 October 29th, 2012?

8 A It does.

9 MR. LESKO: Your Honor, we offered Government's
10 Exhibit 1002.

11 MR. AGNIFILO: No objection.

12 THE COURT: All right. Government Exhibit 1002 is
13 received in evidence.

14 You may publish it.

15 (Government's Exhibit 1002, was received in
16 evidence.)

17 (Exhibit published.)

18 BY MR. LESKO:

19 Q What was the discussion about that's included in that
20 audiotape?

21 A My recollection was it was during a, what's termed an SOP
22 high council meeting with the founder. So it was Ranieri,
23 myself, Jim Del Negro, Mike Baker and Damon Brink. I believe
24 it was shortly after we had held our first SOP weekend.

25 And we were discussing -- we were discussing vows,

1 leadership whether or not he would have the ultimate authority
2 over all decisions.

3 We discussed, you know, promises. It was a wide
4 range of discussions that occurred. But -- and there was a
5 discussion, I think, at the end about legal matters in Mexico,
6 I believe.

7 Q So is it fair to characterize this audiotaped meeting as
8 a planning session of sorts for SOP?

9 A It was. It was towards the genesis of it and trying to
10 figure out, you know, what this would be. We typically held
11 meetings at the beginning. Like around 1:30 in the morning.
12 For about an hour, an hour and a half. And they were
13 recorded.

14 Q And was this about DOS in any respect?

15 A Not the name DOS. But certainly perhaps the --

16 Q Well, I'm not asking for your opinion, I'm saying --

17 MR. AGNIFILO: The witness was answering the
18 question.

19 THE COURT: Do you want to finish your answer?

20 A Just DOS was not named in that recording at all.

21 Q You mentioned that the meeting involved other members of
22 high council. Who specifically participated in this meeting?

23 A So, again, it was Raniere, the founder, myself, Jim
24 Del Negro, Mike Baker and Damon Brink.

25 Q Okay. I'm going to play a portion -- the audiotape is an

1 hour and a half long. Is that roughly correct?

2 A Correct.

3 Q I'm going to play you a portion of it. And we'll talk
4 about it afterwards.

5 MR. LESKO: If we could -- we're already cued up?
6 So why don't we go ahead --

7 THE COURT: Let's put on the record where on the
8 tape.

9 MR. LESKO: Oh, correct.

10 THE COURT: Where we're hearing.

11 MR. LESKO: So we're beginning a portion of
12 audiotape at a timestamp of 25 minutes and 5 seconds.

13 THE COURT: All right.

14 (Audio recording played.)

15 THE COURT: Okay. Try it now.

16 MR. LESKO: Thank you.

17 (Audio recording played.)

18 (Audio recording stopped.)

19 BY MR. LESKO:

20 Q That voice you are hearing now speak and you'll hear it
21 later throughout, whose voice is that?

22 A That is Ranieri.

23 MR. LESKO: We can continue.

24 (Audio recording played.)

25 MR. LESKO: Can we pause.

1 Q Whose voice did we just hear?

2 A That's me.

3 MR. LESKO: Would you continue.

4 (Audio recording played.)

5 MR. LESKO: If we could pause that.

6 (Audio recording stopped.)

7 BY MR. LESKO:

8 Q So in this discussion regarding videotaping of murders
9 and sociopaths, did anything like that happen in SOP?

10 A Murders?

11 Q Correct.

12 A Not that I'm aware of.

13 Q Videotaped murders?

14 A Not that I'm aware of.

15 Q Videotapes of violent activity used as collateral in SOP,
16 was that ever done?

17 A I don't believe so.

18 (Audio recording played.)

19 (Pause.)

20 (Audio recording stopped.)

21 MR. LESKO: And for the record, we're ending the
22 portion at 31 minutes and 41 seconds.

23 Q What was your understanding of what the defendant was
24 saying in that portion of the meeting?

25 A My understanding was that not giving collateral was a

1 sign of weakness, and that giving collateral, especially
2 something sizeable, was a sign of strength and true nobility.
3 That was the sales pitch.

4 Q Were you and other members of SOP required to provide
5 collateral-involved nude photographs of yourself with your
6 legs open?

7 A No.

8 Q Your genitals exposed?

9 A No.

10 Q You previously discussed the types of collateral that
11 were used in SOP.

12 Did that involve -- did that involve the payment of
13 monies in connection with enrollment goals?

14 A At one point I think in 2016, or maybe '17, there was
15 collateral we put up by some of the men. In other words, we'd
16 say, you know, we've enrolled this many people. We put down a
17 certain amount of money to back it, that would be paid into
18 the SOP system, the database, the payment system.

19 If we didn't make good on what we said we would do,
20 we would lose that money.

21 Q In your discussions with the defendant about collateral,
22 as that term would be used in SOP, did he ever indicate that
23 he was going to require participants to send nude photographs
24 of themselves to the defendant?

25 A He did not.

1 Q You're not familiar with the collateral that were used in
2 DOS?

3 A I am.

4 Q Is that collateral, in your opinion, different in the
5 collateral you were discussing with respect to SOP?

6 MR. AGNIFILO: I object to the question.

7 THE COURT: Could you rephrase.

8 Q Do you have an understanding, as you sit here today,
9 regarding the types of collateral that were submitted in
10 connection with DOS?

11 A Yes.

12 Q We've gone over some of that previously, correct?

13 A Yes.

14 Q Does that type of collateral, the nude photographs, was
15 that type of collateral different from the concept of
16 collateral that you were discussing with respect to SOP.

17 A Well, it was far more damaging and extreme, than anything
18 that was being discussed in SOP.

19 Q Was anyone ever asked to have sex with the defendant as
20 part of SOP?

21 A Not that I'm aware of.

22 Q Was anyone ever ordered to have sex with the defendant as
23 part of SOP?

24 A Not that I'm aware of.

25 Q You testified that you worked on film projects with the

1 defendant.

2 A Yes.

3 Q And I think, correct me if I'm wrong, I think you
4 explained that process as being sort of a back-and-forth?

5 A Correct.

6 Q Where the defendant would relate the concept, you would
7 write it down, and then you'd go through drafts of the concept
8 with the defendant?

9 A Correct.

10 Q Do you recall working with the defendant to develop a
11 film concept regarding a mentor in a corporation?

12 A Yes, it didn't go far. It was mostly just a pitch on his
13 part, but I don't think we went -- well, we didn't go anywhere
14 with it. It was just an idea he had suggested to me.

15 MR. LESKO: If we could just show this last exhibit
16 to the witness initially, Your Honor.

17 THE COURT: I'm sorry. I didn't hear you.

18 MR. LESKO: If we could just show this last exhibit
19 to the witness.

20 THE COURT: Sure. Hold on.

21 MR. LESKO: Initially.

22 THE COURT: Go ahead.

23 MR. LESKO: Your Honor, I don't think this is coming
24 up on my screen. It's not on yours either.

25 THE WITNESS: It's not.

1 THE COURT: Hold on.

2 MR. LESKO: Oh, here we go.

3 BY MR. LESKO:

4 Q Showing you what's been marked for identification as
5 Government's 1398.

6 Do you recognize -- well, I'll show you both pages.
7 This is page 1. And I'll show you the second page.

8 Do you recognize that exhibit?

9 I'm sorry. Do you need to read it?

10 A No, I recognize it.

11 Q If you could just briefly explain what that exhibit is,
12 and we'll discuss it.

13 A That is a transcript of a conversation that occurred
14 between Raniere and myself. This was an example of one of the
15 projects he was pitching me.

16 Q And did you actually create this transcript?

17 A I actually don't recall if I did or not. It is possible
18 it was myself. But it is possible it may have Pam Cafritz.

19 Q Have you reviewed the transcript?

20 A I have read it.

21 Q Does it accurately reflect the discussion with the
22 defendant about this film concept?

23 A To the best of my recollection, yes.

24 MR. LESKO: Your Honor, we offer Government's 1398.

25 THE COURT: 1398?

1 MR. LESKO: Correct.

2 MR. AGNIFILO: Objection, Your Honor. There's no
3 tape.

4 MR. LESKO: May we approach and I can give you --

5 THE COURT: All right.

6 (Continued on the next page.)

7 (Sidebar conference.)

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SIDEBAR CONFERENCE

1030

1 (The following occurred at sidebar.)

2 MR. AGNIFILO: My issue is we don't know who created
3 the transcript. We have no idea if it's accurate. If he
4 wants to tell the jury what he recalls about the conversation,
5 that's one thing. But to put a transcript into evidence, not
6 based on a tape recording that he can say, I listened to a
7 tape. I listened to a transcript. This is a transcript of
8 the recording.

9 THE COURT: I understand your point.

10 MR. LESKO: Your Honor, the witness has reviewed the
11 transcript. He says it's essentially a reflection of the
12 discussion he had with the defendant.

13 I can ask him additional foundational questions just
14 to be --

15 THE COURT: Well, did he listen to the tape?

16 MR. LESKO: He recalls the conversation. He did not
17 listen to the tape.

18 MR. AGNIFILO: To call it a transcript, which we
19 have now done, and have it be this level of unreliability, I
20 think is misleading. It has no business being in front of the
21 jury.

22 MR. LESKO: I can rephrase and refer to it as a
23 transcript and make that very clear.

24 THE COURT: What is it then if it's not a
25 transcript?

1 MR. LESKO: It would be, at a minimum, a summary of
2 what was discussed.

3 THE COURT: So why don't you ask him what was
4 discussed? And he can refer to it if he wants.

5 MR. LESKO: Very well.

6 MR. AGNIFILO: He can only refer to it, if he -- if
7 it's a past recollection recorded, he had to have done it. It
8 had to be his notes. And these aren't his notes, so it's not
9 a past recollection of a recording.

10 If he wants to refresh his recollection, he can look
11 at it. And he can talk to the jury about what he remembers
12 the conversation being, but it can't come into evidence.

13 MR. LESKO: Your Honor, the witness has reviewed the
14 document and he adopts it as an accurate summary at a minimum
15 of a discussion he had with the defendant. He reviewed it at
16 the time it was made, and he's reviewed it recently in
17 preparation for his testimony.

18 So I think an appropriate way to handle this would
19 that the witness has reviewed the document, and it is an
20 accurate summary of the conversation that he had with the
21 defendant, and more particularly, it adequately represents the
22 film concept that they were discussing.

23 THE COURT: And you don't want -- you won't put it
24 in, but you'll -- you want him to refer to it? Or do you want
25 it still put it in?

1 MR. LESKO: Well, you know what, why don't we do
2 this. I won't seek to admit it. I'll ask him questions, if I
3 have is to refresh his recollection as well, and at the end if
4 it's abundantly clear that this document is something that he
5 clearly adopts, then I may seek to admit it afterwards.

6 MR. AGNIFILO: But it's just a round up. There's no
7 hearsay exception for adopting another person's summary. It
8 doesn't hit any of the pigeonholes, for a hearsay exception.
9 If he -- so it just it doesn't come up.

10 MR. LESKO: Your Honor, if I may, Pam Cafritz is the
11 person who created the transcript. She's a coconspirator.

12 The defendant's statements are reflected in the
13 document, so they would be admissible, and the witness'
14 statements, he's on the stand, are included and no one else.
15 So we believe the statements themselves reflected in the
16 exhibit are actually admissible.

17 MR. AGNIFILO: We don't know that Pam Cafritz made
18 it. He might have made it. It's none of the things to be
19 admitted in evidence that it would need be. It's not his own
20 notes. It's not an accurate transcript. We don't have any
21 basis for saying that. And if he wants to use it to refresh
22 his recollection, the witness can use anything to refresh his
23 recollection. But it doesn't come into evidence.

24 THE COURT: Why don't you ask him the questions and
25 I'll let you know.

SIDEBAR CONFERENCE

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MR. LESKO: Thank you.
THE COURT: Not sealed.
(End of sidebar conference.)
(Continued on the next page.)

1 (In open court; Jury Present.)

2 MR. LESKO: Your Honor, just to be careful, I just
3 want to make sure we're still only publishing this to the
4 witness.

5 THE COURT: Yes, correct.

6 MR. LESKO: Thank you, Judge.

7 BY MR. LESKO:

8 Q I put Government's 1398 back before you, Mr. Vicente.

9 Without getting into the substance of this document,
10 could you just tell us what it is?

11 A Well, it's a transcription of a conversation of a movie
12 idea that Ranieri had suggested to me.

13 Q So who -- and you don't recall exactly who created this
14 transcript?

15 A I don't recall. There's no notation here as to who the
16 transcript -- I -- I can tell you that V is his nickname and
17 I'm Mark.

18 Q And have you -- is this a document you would have seen at
19 the time at or around the time it was created?

20 A Yes, because generally speaking, what happened is our
21 conversations were transcribed almost immediately. And kept.
22 So yes.

23 Q Do you recall reviewing this document at or around the
24 time it was created?

25 A I don't recall at that time, no.

1 Q Have you --

2 A There's so many.

3 Q Have you reviewed this document recently?

4 A Possibly two weeks ago.

5 Q Okay.

6 A I haven't read it carefully since then.

7 Q Does it accurately reflect or at a minimum summarize the
8 conversation that you had with the defendant about this film
9 concept?

10 A I believe so.

11 MR. LESKO: Your Honor, we'd offer 1398.

12 MR. AGNIFILO: We object to it.

13 THE COURT: The objection is overruled.

14 (Government's Exhibit 1398, was received in
15 evidence.)

16 (Exhibit published.)

17 BY MR. LESKO:

18 Q So this document is a two-page document; is that correct,
19 Mr. Vicente?

20 A Correct.

21 MR. LESKO: Showing the second page now to the jury.

22 Q And you've mentioned V. V stands for what?

23 A V is the short for Vanguard, and V was the nickname used
24 for Raniere.

25 Q And you were reflected in this transcript how?

1 A As Mark.

2 Q Okay. I don't think we have to read the whole -- the
3 document, unless we have to.

4 But could you just describe for us what was the film
5 concept that the defendant was discussing with you?

6 A In simple terms, the idea was that there's what's called
7 the good, the bad and the mentor. That there was this
8 corporation and this was this guy running the corporation, is
9 a really good guy. And that there's some -- some bad
10 influence occurring in the corporation and the good guy has a
11 mentor that, you know, he works with the very evolved person.

12 And the mentor's helping the good guy figure out
13 like who's the bad person in the organization, you know, who
14 is doing all these destructive things. And then the joke or
15 the trick at the very end is that the good guy realizes that
16 the mentor is actually the one that's the bad guy, that's
17 pulling all the strings, and even the bad person is a tool of
18 the mentor.

19 So that, you know, they were sort of looking for
20 this psychopath in the organization and it turns out the
21 mentor was the one all along who was the psychopath advising
22 the good guy.

23 Q As you sit here today, do you have an understanding of
24 this concept as it relates to the defendant?

25 A I think I just lived through it.

1 MR. AGNIFILO: Objection to the form.

2 THE COURT: Sustained.

3 Q In retrospect, do you attach any significance to this
4 film concept?

5 MR. AGNIFILO: Same objection.

6 THE COURT: I'm sorry. That's sustained.

7 Q What is your understanding of what the defendant was
8 trying to communicate with this film concept?

9 MR. AGNIFILO: I object, Your Honor.

10 THE COURT: Overruled.

11 A Well, I think it was quite a sick, practical joke. The
12 love and the love's practical jokes.

13 I think this was a practical joke on me to tell me
14 exactly what he was doing with me ten years ago.

15 Q What do you mean by practical joke?

16 A Well, I believe that I was the good person. I believe
17 the bad person was -- I thought Allison Mack. I thought she
18 was the problem and I was going to the mentor all the time to
19 figure out what was going on, like what was really going on.

20 So it seems to me very, very starkingly [sic]
21 similar.

22 Q And who was the mentor that you were going to?

23 A Raniere. He was my mentor.

24 MR. LESKO: No further questions, Your Honor.

25 THE COURT: All right. We'll take our mid-morning

1 break.

2 (Jury exits the courtroom.)

3 THE COURT: The witness may stand down. Please do
4 not discuss your testimony with anyone. We'll take a
5 ten-minute break.

6 THE WITNESS: Sure.

7 (Witness steps down.)

8 (Whereupon, a recess was taken at 11:52 a.m.)

9 THE COURT: All right.

10 (Defendant enters the courtroom.)

11 (Witness resumes the stand.)

12 THE COURT: Ms. Geragos, why don't you go up there.

13 MS. GERAGOS: I'll wait for Mr. Agnifilo.

14 THE COURT: I really wish you would.

15 I offered Ms. Geragos, but she declined the offer.

16 MR. AGNIFILO: Out of politeness.

17 THE COURT: Out of politeness.

18 All right. Are you ready?

19 MR. AGNIFILO: I am, yes.

20 THE COURT: Okay. Let's bring in the jury.

21 (Jury enters the courtroom.)

22 THE COURT: Please be seated.

23 You may proceed with cross-examination.

24 Mr. Agnifilo.

25 The witness is reminded he is still under oath.

1 THE WITNESS: Yes, Your Honor.

2 CROSS-EXAMINATION

3 BY MR. AGNIFILO:

4 Q Good morning, Mr. Vicente.

5 A Good morning.

6 Q My name is Marc Agnifilo. I'm Keith Raniere's lawyer.

7 I'm going to ask you some questions.

8 If a question I ask you isn't clear to you, feel
9 free to ask me to rephrase it and I'm happy to do that.

10 A Yes, sir.

11 Q Earlier this morning you told the jury that you were
12 afraid for your life.

13 A Yes.

14 Q Because of NXIVM and Keith Raniere; is that right?

15 A Yes.

16 Q And you said you were afraid for the life of your mother,
17 correct?

18 A Yes.

19 Q And the life of your wife, correct?

20 A Yes.

21 Q And you said were you afraid of all these things around
22 the time you were leaving NXIVM in June of 2017, correct?

23 A Yes.

24 Q When did you sign your deal with HBO to make a film?

25 A Well, I didn't sign a film with HBO to make a film.

1 CROSS-EXAMINATION (Continued)

2 BY MR. AGNIFILO:

3 Q Are you in a commercial relationship in terms of making a
4 movie about this case?

5 A Not with HBO?

6 Q Explain to the jury with who?

7 A Well, with two film makers; I believe then HBO came on
8 board.

9 Q So an HBO movie, an HBO film, is being made about this
10 case, correct?

11 A I don't actually know the content, no.

12 Q Have you been paid?

13 A Not to be in the film, but I've been paid for materials
14 and I did some shooting earlier on.

15 Q So you were paid for what exactly?

16 A Standard materials release, and then additionally some
17 shooting that I did where I had sold the material.

18 Q You said a lot of what you talked about this morning took
19 place in the spring May June 2017, correct?

20 A Yes.

21 Q When did the filming for this project begin?

22 A Well, I began documenting myself to make sure that if
23 anything went awry I could say this is what I tried to do,
24 sometime in June. As far as shooting, what would become the
25 HBO thing, I think it was a few months later, as far as I

1 recall.

2 Q The filming started in June 2017; isn't that right?

3 A I started shooting, I started filming myself, and I was
4 filming myself because I believed I would be framed for
5 something, so I wanted to have proof of what I actually tried
6 to do.

7 Q So between June of 2017 and August of 2017 there was
8 filming being done for a film regarding this case and Keith
9 Ranieri; fair to say?

10 A Regarding certainly me and some of what I was trying to
11 do.

12 Q What film makers did you it reach out to who now has a
13 contract with HBO to make a movie about this case?

14 A I reached out to Jehane Noujaim.

15 Q When did you reach out to Jehane?

16 A I think it was later in June, I think.

17 Q What prompted you to reach out to a film maker to make a
18 movie about this case?

19 A That's not why I reached out to her. I reached out to
20 her because she had attended the 11-day intensive and I wanted
21 to tell her that all of this was not what I thought it was.

22 Q So you start having that conversation, and how quickly
23 did it transition into a conversation about you being involved
24 in a movie?

25 A That didn't happen for a long time.

1 Q When did you it first have a conversation with Jehane
2 about you being involved in a movie?

3 A It wasn't about me being involved in a movie. It was,
4 initially I was trying to document myself. I don't believe it
5 was seen as any kind of a movie for quite sometime. I think
6 it was later, it was later in 2017 when the idea came up.

7 Q When were you first paid -- tell us again what were you
8 paid for?

9 A For some standard materials and standard material
10 release.

11 Q When did you get that money?

12 A Sometime in 2018.

13 Q Who paid you the money?

14 A That was I believe Noujaim Films.

15 Q These people now have a contract with HBO, you
16 understand?

17 A That's my understanding.

18 Q Have you been in the role of a consultant in connection
19 with this film project?

20 A I consulted on my materials in that capacity, yes.

21 Q Tell the jury how you consult on your own materials?

22 A Well, I have my archival materials, then I have my
23 professional materials from the course of my career. So it's
24 basically like explaining the context of these things. Then
25 also with respect to materials that I shot of myself,

1 explaining the context of how they relate.

2 Q Did you work alongside with Jehane and Karim in the
3 making of this movie?

4 A Well, at the very beginning I shot some material. I
5 don't know that was alongside them, because sometimes they
6 were not even around. I, in essence, sold that material.

7 Q Do you recall telling the FBI that you worked along side
8 Karim and Jehane in the making of this movie?

9 A Earlier I was, in the sense that I was on camera, so i
10 that way, yes.

11 Q When you say you were on camera, you're on camera doing
12 what?

13 A Expressing the way I felt about things. Talking about
14 what I understood and what I had realized and how I was upset
15 about it.

16 Q You said a lot of the same things on camera that you said
17 here in the last few days; fair to say?

18 A I don't think so. I think I was more specific about
19 things here.

20 Q You talked about Keith Raniere in connection with this
21 film project, correct?

22 A I believe so.

23 Q And you were shot on camera doing so, correct?

24 A I believe so.

25 Q When you say you believe so, are you not sure? Was there

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1 a camera rolling with you talking and the camera pointed at
2 you?

3 A At times I was aware, and there times I wasn't. It was a
4 camera at times when I was aware when I was talking.

5 Q Tell us about the times that you were unaware that you
6 were being filmed for a movie?

7 A Honestly when I was, you know, crying or just upset about
8 something, or you know reading something.

9 Q So how many, if you had to estimate, how many hours of
10 footage were taken of you talking about this case and issues
11 related to this case on film?

12 A It's hard for me to -- I can estimate.

13 Q Go ahead.

14 A Thirty, 40 hours, maybe more, I'm not entirely sure.

15 Q What different locations were you filming?

16 A I'm not -- I have a confidentiality agreement with the
17 producers, I'm not certain I can say that or not.

18 MR. AGNIFILO: I'll defer to the Judge.

19 THE COURT: Answer the question.

20 THE WITNESS: Yes, your Honor.

21 Q Go ahead.

22 A So my apartment, Catherine Oxenberg's house, often I was
23 in a car driving. In Vermont, there was a time I went to
24 Vermont.

25 Q You brought a film crew with you to Vermont?

1 A I actually asked because I was afraid for my life; I
2 wanted to some kind of protection.

3 Q And did you call the local police in Vermont?

4 A No, because you can't call the police based on -- I tried
5 that for a long time. I got no where. So they are just going
6 to ignore you.

7 Q You're telling us the reason you brought a film crew to
8 Vermont wasn't so you could be in an HBO movie, it was to
9 protect yourself?

10 A That was one reason. The other was to document what I
11 was trying to do. I believed I was going to get framed for
12 things. I believed there was a possibility I would end up in
13 prison because they would frame me for something.

14 Q Did you go to Vermont in connection with the Tourettes
15 video?

16 A I did, yes.

17 Q Tell the jury about that.

18 MR. LESKO: Objection.

19 THE COURT: Sustained.

20 Q You said you had a film crew in Vermont?

21 A I didn't have the film crew.

22 Q You caused a film crew to go with you to Vermont?

23 A Yes, I asked.

24 Q When we say film crew, what are we talking about? How
25 many people? What kind of equipment?

1 A It was two people, it was video camera and some sound
2 equipment. I recall that was all.

3 Q What was the footage you shot in Vermont?

4 A I had tried to talk to the film maker about the film and
5 my concerns and then I went to the theater. They shot some of
6 the material of me attempting to talk to people, then we were
7 asked to leave.

8 Q You said that you were at Catherine Oxenberg house and
9 you had a film crew there as well, correct?

10 A There was a film crew, but it wasn't mine.

11 Q What was shot there?

12 A Various discussions, attempting to figure out what was
13 going on, there were a number of discussions that happened
14 there.

15 Q And you had all of these discussions on camera, correct?

16 A I don't know that all the discussions were on camera. I
17 mean, there were days that we were there, that there was no
18 camera.

19 Q But you specifically chose to have discussions with
20 Catherine Oxenberg about this case with a film crew capturing
21 all that footage, correct?

22 A There was no case at that point.

23 Q This matter.

24 A Yes, this matter. Because I wanted to make sure that I
25 could document, I thought things were going to go badly for

1 me, I wanted to document what I was trying to do.

2 Q You're also trying to make a movie.

3 A I'm not trying to make a movie, because I'm not in that
4 role.

5 Q You were paid for your role in a movie, correct?

6 A No, I was not.

7 Q The money was for what? You gave materials to --

8 A Paid for materials. Then I was paid for some materials
9 that I shot that I then sold, so they owned it outright.

10 Q And when you, you said earlier you played a role of some
11 sort as a consultant?

12 A Yes. It was regarding like my materials and the things I
13 was handing over. Consulting, explaining it. It wasn't just
14 handing it over with no explanation. It was like in essence
15 me consulting, this is the stuff I have, and it's related to
16 these things, that kind of thing.

17 Q Isn't it to fair to say you had a primary role in the
18 film's production?

19 A I had a role in the beginning of doing some shooting, but
20 I wouldn't say that, no.

21 Q Did you say that? Did you say it specifically to the
22 FBI --

23 A At the beginning.

24 Q Let me finish the question. Did you say that to the FBI
25 in an interview that you had with the FBI on March 29, 2019,

1 that you had a primary role in the film's production?

2 A At the beginning I had a role, then that changed.

3 Q My question is, did you have a primary role?

4 A It wasn't primary, but at the beginning I had a role.

5 Q Did you tell the FBI you had a primary role during your
6 interview in March --

7 A I can't remember. If you're saying it's there.

8 Q I can show it to you.

9 A Sure.

10 MR. AGNIFILO: Just for the witness. I'm going to
11 show the witness 35800MV53, specifically the fourth page.

12 Q You're not to read this, just look at it, looking at the
13 bottom of the fourth page.

14 A Yes. In the beginning, yes.

15 Q And so do you agree with me that you said that you had a
16 primary role; and you're saying you had a primary role in the
17 beginning, correct?

18 A In the beginning.

19 Q And that you moved away from that primary role, is that
20 your testimony?

21 A Yes.

22 Q Now while you had a primary role in the production of
23 this film, what were you doing?

24 A I was shooting. And I was shooting some of the LA stuff.
25 When I say stuff, I was shooting some of the discussions and

1 activities in LA in the beginning. I was shooting what is
2 called B-roll, drone footage, that kind of thing.

3 Q And did you shoot or cause to be shot, in the film sense,
4 any of the people that you've discussed thus far in your
5 testimony?

6 A Did I cause? Can you --

7 Q Was India ever on tape?

8 A I don't believe India was ever shot for this, no.

9 Q Did you ever shoot India with a camera, with a film
10 camera?

11 A I don't believe I did.

12 Q Did you ever take footage of any of the women in DOS?

13 A I -- I don't think I did.

14 Q Did anyone else in the film crew in this project do so?

15 A I believe so. But the issue there again is one of
16 confidentiality with the producers.

17 MR. AGNIFILO: Your Honor, I think the witness
18 should answer the question.

19 THE COURT: I think there is a yes or no to that
20 question. So yes or no?

21 THE WITNESS: Could you rephrase the question.

22 Q Did anyone in connection with this film project take any
23 footage of any women in DOS?

24 THE COURT: To your knowledge.

25 A Yes, I think so.

1 Q How many women in DOS were put on camera?

2 A That I'm aware of, I think one.

3 Q When did you find out that this film project was bought
4 by HBO?

5 A I believe that was this year.

6 Q Do you expect to be in the film?

7 A I don't have a say over that. I'm assuming probably, but
8 I don't have a say on it.

9 Q We're going to go back to 2005 when you first joined you
10 joined NXIVM, in 2005?

11 A Yes, I think so. I think I did. Yes, sounds about
12 right.

13 Q You stayed in NXIVM until May or June of 2017?

14 A Until May 2017, yes.

15 Q So 12 years?

16 A Yes.

17 Q And during those 12 years how many times were are you
18 promoted within NXIVM?

19 A Are we talking stripes?

20 Q Yes, stripes too.

21 A So if you count stripes as well, 12 times.

22 Q And by the time that you joined NXIVM in 2005, fair to
23 say you were fairly worldly person, you lived in many
24 different places; fair to say?

25 A I don't know, compared to what?

1 Q South Africa.

2 A I've lived in a number of places.

3 Q Ashland, Oregon?

4 A Yes. I don't know to characterize myself as wordily.

5 Q What was your education at the time you joined NXIVM?
6 How far had you gone to school?

7 A I completed high school and I completed four years of
8 college.

9 Q Where did you go to college?

10 A The University of the Witwatersrand in Johannesburg,
11 South Africa.

12 Q What did you study there?

13 A I studied film and drama. And I majored in directing,
14 cinematography, and theater lighting.

15 Q Did you study acting, among other things?

16 A Yes.

17 Q Tell us about your acting courses in college, how many
18 did you take, what did they focus on?

19 A The first three years it was a requirement; so I did
20 acting classes every single day.

21 Q Every single day for three years?

22 A Well, minus the weekends and holidays, yes.

23 Q Prior to your coming to NXIVM you had made a movie,
24 correct?

25 A Yes, well many.

1 Q Many. One that got a particular amount of attention,
2 correct?

3 A Are you referring to What The Bleep?

4 Q Yes.

5 A Yes.

6 Q When did you make What The Bleep?

7 A I started making it in 2001, we completed in 2004.

8 Q That was, that had fairly wide release?

9 A Not wide release, but it became pretty acclaimed.

10 Q You said you were promoted in NXIVM 12 different times.
11 You made income from your work in NXIVM starting in 2007; is
12 that fair to say?

13 A Correct.

14 Q And between 2007 and 2017 could you estimate how much
15 income you made from NXIVM?

16 A I don't know that I can. I think monthly the most I ever
17 made was 8,000, the least I made was like 2,000.

18 Q What is Insight Industries LLC?

19 A Insight Industries was an LLC that I set up when I moved
20 to Albany.

21 Q And fair to say that you took income from NXIVM through
22 Insight Industries LLC?

23 A Yes. At first I didn't, but then yes.

24 Q And at first how did you take the income that a were
25 making from NXIVM?

1 A I think I took it into another LLC, I had then I switched
2 over.

3 Q After you started using insight LLC, did you take income
4 in any way from NXIVM or was it all through Insight LLC?

5 A I don't know that I'm absolutely certain. I'm assuming I
6 did take it into the corporation, but I may be mistaken.

7 Q Do you recall in 2012 if you made \$79,557 through Insight
8 LLC?

9 A I don't recall, but if you have a tax return then that's
10 probably accurate.

11 Q Does that sound about right for 2012?

12 A I think it does, yes.

13 Q For 2013 \$63,325 through insight LLC?

14 A Again, I think you have more information than I do but
15 that sounds about right.

16 Q Do you recall making less money in 2013 than you did in
17 2012?

18 A I don't recall.

19 Q In 2014 \$52,573 through Insight? Does that sound about
20 right?

21 A I can't be certain.

22 Q In 2016 about \$46,000 through Insight LLC, does that
23 sound about, right?

24 A Again, I think.

25 Q And do you recall making less income from your work at

1 NXIVM between 2012 and 2016?

2 A That actually I do recall, yes.

3 Q Tell us what you recall about that.

4 A I remember that I was involved in so many different
5 projects that I was not giving adequate time to the field
6 trainer business.

7 Then also I recall at one point there was a switch
8 over. I don't remember the dates. Where at times NXIVM was
9 paying, rather than paying directly to the Vancouver center it
10 was paid into NXIVM and then redistributed from there. So I
11 remember there was a an exchange, there was a fluctuation in
12 income earned because of the money going to a -- the issue is
13 going to Canada first then to the U.S. back to Canada. So we
14 simplified things.

15 Q You said that Sarah and yourself ran the centers in Los
16 Angeles and in Vancouver?

17 A Yes, we were the co-owners. She mostly was -- she was in
18 Vancouver all the time, I was in LA a lot more. We ran it
19 together.

20 Q Do you recall as things progressed leading to 2017 the
21 Vancouver center made considerably less money than it did
22 beforehand?

23 A I do recall.

24 Q Tell the jury what you recall.

25 A One of the things that I remember happening is during,

1 when Ultima started in 2014, a lot of our staff were in
2 essence being asked to go to Albany and so we had a drain of
3 staff. And we were struggling to maintain our numbers and our
4 ability to run classes. So we were struggling as centers,
5 because many of our staff were moving back to Albany.

6 Q Is that true both for the Vancouver center and the Los
7 Angeles center?

8 A Yes, that was the case for both.

9 Q Tell me if this is right, as someone who is involved in
10 owning a center, you're essentially, you have expenses in
11 connection with the center; is that right?

12 A Right.

13 Q Tell the jury what the expenses are.

14 A They are the actual rent, the insurance, there is power,
15 water, there was some janitorial services, I believe. That's
16 what I can recall right now.

17 Q Do you recall in 2016 early 2017 the Vancouver center was
18 behind in its in paying its expenses?

19 A I think so. I'd have to look at the spreadsheets. I
20 recall something like that, at one point we were a little
21 behind.

22 Q Do you recall if that is something that concerned you as
23 one of the co-center owners?

24 A It did actually not because I remember having to put some
25 of our monies in to stay afloat.

1 Q That's true for you and Sarah?

2 A Yes, we both had to.

3 Q This is going on in early 2017; fair to say?

4 A Actually it happened a few different times during the
5 course of the center's life.

6 Q One of the those times was early 2017?

7 A I don't recall if it's exactly 2017, but I do recall
8 there were a number of times. Because I recall at one point I
9 was discussing we put in, I think it was \$70,000, at one point
10 to keep thing as float.

11 Q Is the \$70,000 of your own money?

12 A Yes.

13 Q So not you and Sarah together, meaning your own money?

14 A No, Sarah and I together.

15 Q Do you recall how much of the 70,000 was your own money?

16 A I think it was split pretty even, so it would have been
17 at least 35.

18 Q How many times did that happen that you and Sarah had to
19 put in your own money to keep the center afloat?

20 A I think it was maybe three times, maybe.

21 Q Do you remember when the last time was?

22 A I don't specifically, no.

23 Q How many times did you go to Fiji?

24 A I think it was three times.

25 Q How many times did you pay for yourself to go to Fiji?

1 And how many times did someone else pay for to you go to Fiji?

2 A I think I paid once. And the two other times I think
3 they paid. Because they were intensives, I think the
4 corporation paid, the corporation not being me.

5 Q So one of the perks, I guess, of the job, in addition to
6 the salary, you get expense-paid trips to Fiji on occasion?

7 A Well, I worked the entire time so I didn't get a chance
8 to enjoy things.

9 Q How long did you go each time?

10 A My recollection on one time was a week, another time was
11 I think it was ten days. I recall the weather was poor. I
12 was trying to shoot. It was miserable weather, we had to wait
13 for sun.

14 Q You testified on direct examination before, that for the
15 vast majority of your time with NXIVM you believed was doing
16 good things, correct?

17 A Up until I'd say 2015 I felt that, yes.

18 Q And that was important to you. The reason you stayed for
19 12 years was you believed that NXIVM was doing good in the
20 world, correct?

21 A Yes.

22 Q And NXIVM was doing tangible real things in the world.
23 You talked on direct examination about the Mexico Peace
24 Project, tell the jury a little about that?

25 A The Mexico peace project was borne --

1 MR. LESKO: Objection.

2 THE COURT: Sustained.

3 MR. AGNIFILO: Your Honor, can we approach?

4 Q Do you recall talking on direct examination about a film
5 project you did in Mexico?

6 A I do.

7 Q Please explain to the jury what it was?

8 A The --

9 MR. LESKO: Objection.

10 THE COURT: Sidebar.

11 (Continued on the next page.)

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1 (Sidebar conference.)

2 THE COURT: Let's start with the objection.

3 MR. LESKO: The objection is I don't believe
4 Mr. Vicente explained in detail the nature of the film project
5 that he worked on in Mexico. He mentioned he did work on a
6 film project. What I'm concerned about here is that this will
7 end up with Mr. Agnifilo questioning the witness extensively
8 about the defendant's involvement in a movement in Mexico that
9 was not discussed or testified to by Mr. Vicente, and this
10 will be a distraction. And it goes to the issue of good
11 works, the alleged good works, by the defendant. There is a
12 whole history here with the Mexican movement and the
13 defendant's alleged involvement in the Mexican movement. It's
14 completely irrelevant. And we were very careful on direct
15 examination of the witness to have him not go into detail
16 regarding that Mexican story.

17 MR. AGNIFILO: It's critically relevant. It's
18 critically relevant. It's clearly for reasons that he's
19 staying in NXIVM. And the fact that Keith Raniere does do
20 work as part of NXIVM is absolutely relevant.

21 We don't have to have a trial of only negative
22 portrayed. This is a balanced trial. He mentioned this on
23 direct examination. He said so himself. I want him to
24 explain more about what he already brought up in direct
25 examination. It's absolutely fair cross-examination. And I

1 want to ask him about it.

2 THE COURT: Anything else?

3 MR. LESKO: Your Honor, I believe your Honor has
4 ruled on this issue in terms of the alleged good works. I
5 don't object to cross-examination regarding the film, the fact
6 that there was a film he was working on, but I think --

7 THE COURT: I think also whether Mr. Raniere had a
8 relationship with making film, that I'll allow. But a whole
9 discussion about the program in Mexico is really not within
10 the scope of the direct. So you can go into it, but within
11 reason.

12 MR. AGNIFILO: Very good.

13 (End of sidebar conference.)

14 (Continued on the next page.)

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1 (In open court.)

2 BY MR. AGNIFILO:

3 Q Mr. Vicente, you were just about to discuss a film
4 project you were doing in Mexico, please tell the jury about
5 it.

6 A Sure. So I think it began in 2009 and there were a
7 number of the Mexican students in the organization who were
8 from affluent families and experienced kidnappings. They were
9 talking to Raniere about this problem and he suggested he may
10 have solutions.

11 We had a meeting and I began shooting the meeting,
12 which I believe lasted four days. And then the idea, a
13 movement, was suggested. I decided to continue shooting. I
14 went to Mexico to follow all these people.

15 They were going from town to town singing and
16 creating anthems and trying to get people involved in the
17 movement. And I documented that for sometime, until I found
18 additional stories to support that. Then finally, I think we
19 finally released the film in 2016.

20 Q You said that you filmed this movement in Mexico,
21 correct?

22 A I filmed as much as I could, yes.

23 Q And what was Mr. Raniere's role in connection with the
24 movement and your filming of the movie?

25 MR. LESKO: Objection.

1 THE COURT: You can restate.

2 Q What was Mr. Raniere's role in this?

3 MR. LESKO: Objection.

4 THE COURT: You can answer.

5 A He was giving them the philosophy of what to do. And the
6 idea was that they were to go and enact the philosophy.

7 Q What was that?

8 A It was things like non-violent ideas, like if somebody
9 hits you, do nothing, that would expose the violence.
10 Shunning, boycotts, in essence standing up to criminals.

11 Q I think you talked on direct examination about Eric
12 LeBaron?

13 A Yes, the young man that was kidnapped.

14 Q Tell the jury.

15 A The story I told before?

16 Q Please.

17 A What happened is, not as a film maker I was not finding
18 the story compelling, so I was looking for heroic examples.
19 We read in the paper about this young boy that was kidnapped
20 in the small town in Chihuahua, Mexico.

21 So the story was that he was kidnapped. The
22 kidnappers demanded a million dollars. The farmers got
23 together to raise the money. And then the leader decided this
24 was a very bad idea, we shouldn't do it. And so he instead --
25 they surrounded the Government building and they in essence

1 forced the Government to tell the kidnappers release him,
2 which indicated they were working together.

3 And after that, when we read that, we thought this
4 is a great story let's go and document what we can. So we
5 documented the after of that and the demonstrations that they
6 were doing. And then we documented, we interviewed the
7 leader. And then he was murdered. And then we went back to
8 interview the community.

9 And then I think it was after he was murdered --
10 sorry, before he was murdered that I told Ranieri about the
11 community and that we talked about, well, maybe we can have
12 them visit us at some point. That got delayed because he got
13 murdered.

14 Sometime later, I invited a number of them to come
15 to Albany to take training and to listen to Ranieri's
16 philosophies on violence.

17 Q The philosophy was a non-violent philosophy, correct?

18 A That was the philosophy.

19 Q I think you talked at different points in your direct
20 examination on the concept of readiness; is that fair to say?

21 A Yes.

22 Q Readiness being someone sends out a message, like a
23 question mark or something, to a bunch of people, who then
24 send it out to a bunch of people, and then everybody kind of
25 reverts back that they are ready, that they got the message,

1 and they are ready, whatever ready might mean, correct?

2 A Yes. And the idea was ready for some specific action if
3 there was one.

4 Q I think you talked on direct examination about a specific
5 instance, I believe it involved someone involved in the
6 Mumford family who's father was missing for a period of time.
7 And the group employed readiness principles to locate the man.
8 Do I have that, right?

9 A I don't recall which family it was. I think it was in
10 Europe, but it's possible.

11 Q Tell the jury how that worked.

12 A I just remember that there was somebody that was missing,
13 and couldn't be found, and that the system was alerted to
14 which involved everybody calling everybody they knew related
15 to that person, like family and hotels and different things,
16 until they were found. In essence it was seen as a kind of a
17 rescue.

18 Q In addition to that incident, do you recall an incident
19 where readiness was used to address a situation in Mexico? Do
20 you know someone named Juan Salines?

21 A Yes.

22 Q Does that jog your memory?

23 A It's not jogging my memory, though. Do you have more
24 information?

25 Q Actually, do you recall receiving an e-mail about, I'm

1 going to show you, it's Defense exhibit 332, just going to
2 show it to you to see if you can recollect it. It's two
3 pages. I'll show you the first page first. Do you see that
4 first page?

5 THE COURT: This is?

6 MR. AGNIFILIO: Only marked for identification as,
7 Defense exhibit 332.

8 THE COURT: All right.

9 Q Can you see it okay, Mr. Vicente?

10 A I can. Thank you.

11 Q That's from you, right, Mark SOP, that's your e-mail
12 address?

13 A That was, yes.

14 Q At the time. It's to a number of people do you see that?

15 A Yes.

16 Q The name there, Erik Einhaert, who is that?

17 A That's Keith Raniere scrambled.

18 Q Fair to say, that was a character in a movie project you
19 guys were talking about?

20 A Correct.

21 Q This is the first page and an indication of an
22 attachment, do you see that?

23 A Yes.

24 Q I'm going to go to the second page the attachment.

25 A I remember now.

1 Q Okay. Let's do it this way, you agree with me this is an
2 e-mail from you to a number of other people including
3 Mr. Raniere, correct?

4 A Yes.

5 MR. AGNIFILO: We offer --

6 MR. LESKO: Objection.

7 THE COURT: I don't have it. Come to sidebar.

8 (Continued on the next page.)
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1 (Sidebar conference.)

2 THE COURT: What is your objection?

3 MR. LESKO: To the admission of the e-mail into
4 evidence. He acknowledged that it refreshes his memory.
5 Mr. Agnifilo can use it to refresh his memory. The document
6 is hearsay. We object to the admission of the document
7 itself.

8 THE COURT: It is hearsay. Let's start with that.
9 And why is it admissible?

10 MR. AGNIFILO: Because it goes to, he sent this to a
11 number of other people, that's relevant. This shows that
12 connection of the different people in SOP.

13 THE COURT: You can ask him about what is in it. If
14 he doesn't remember it, then can you show it to him. Then,
15 does it refresh his recollection. But it's still hearsay.

16 I didn't make the rules of hearsay. I would not
17 have made these rules of hearsay. I have an objection of how
18 hearsay and non-hearsay is established by whoever established
19 it in order to teach it to students so they will not
20 understand it.

21 MR. AGNIFILO: I sustain your objection.

22 THE COURT: Having said that, and established my own
23 bias regarding hearsay, I'm just trying to grapple with
24 hearsay here. It's hearsay.

25 So why don't you do it the way we normally do it on

SIDEBAR CONFERENCE

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1 cross-examination. If it's his statement in writing, ask him
2 about it. Let's move on.

3 (End of sidebar conference.)

4 (Continued on the next page.)

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1 (In open court.)

2 BY MR. AGNIFILO:

3 Q Mr. Vicente, when I showed this to you you recalled the
4 incident, correct?

5 A I think it's the same one.

6 Q So here is what we can do. Let me see if I can do this
7 so you can see it. Can you read that okay?

8 A Yes. Would you like me to read it?

9 Q I don't want to you read it. What I'm going to do is --

10 THE COURT: You're going to ask about this.

11 Q I'm going to ask you about it.

12 A Understood.

13 Q This is about one of your members who was intercepted in
14 traffic and detained by police, the police bearing
15 military-grade assault rifles, right?

16 A That's what I recall, yes.

17 Q And as soon as this person was stopped --

18 MR. LESKO: Objection.

19 THE COURT: Sustained as to form.

20 Do you remember this incident?

21 THE WITNESS: I think I do. I haven't read this,
22 but I think I do.

23 MR. AGNIFILO: I don't want to keep coming back to
24 side bar.

25 THE COURT: You don't have to. I'll ask the

1 questions and get it right.

2 Go ahead, next question.

3 BY MR. AGNIFILO:

4 Q Let me ask you, what do you recall -- let me -- take
5 sometime, read this to yourself. Let me see if I can get the
6 whole thing on one shot there.

7 A Can we do it in sections, my eyesight is not so awesome.

8 Q You tell me when you're done and then I'll move it.

9 (Witness reviewing document.)

10 A Would you mind moving it?

11 Q Of course. Here you go.

12 (Witness reviewing document.)

13 A I've got on the bottom of the page.

14 Q Is your memory about this event refreshed?

15 A Yes.

16 Q Tell the jury what happened.

17 A My recollection is that Juan Salines had shared with me
18 over-the-phone that one of the men had been transporting cash.
19 And that he believed that the somebody had been seeing him
20 pick the cash up and he was traveling with the cash. So the
21 police stopped the vehicle.

22 Q Can I just stop you for a second? This is in Mexico?

23 A Mexico City.

24 Q Go ahead.

25 A The police stopped him. And basically arrested him and

1 impounded his car, I think they impounded the cash, and this
2 bottle of Spirulina, which they thought might be something.
3 They took him to the police station. And I don't recall if it
4 was because the man had sent a message for help or he missed
5 his -- I don't know, but I remember getting a call from Juan
6 Salines at the police station asking how many men were there.
7 The idea is, men would wait to support him.

8 Eventually the man was released on the idea, the men
9 had the idea they put pressure on the police to in essence
10 expose that what they were doing was corrupt. The police
11 would realize they can't mess with all these people. That was
12 the general idea of the story.

13 I believe I was the one that said to Mr. Salines,
14 why don't you write it down and send it to me.

15 Q When you say the men, are you talking about SOP?

16 A Yes. The gentleman in question was an SOP team in Mexico
17 City. I don't know if the other men were on his team or in
18 addition to other teams, I'm not sure. But yes, it was an SOP
19 man.

20 Q When did the concept of readiness begin within SOP, if
21 you remember?

22 A Wild guess 2012, I'm not for sure.

23 Q We can see, judging by this e-mail, this is 2015, so this
24 is after you guys had already started the concept of
25 readiness, correct?

1 A Yes.

2 Q Tell me if you would, if you recognize these words I'm
3 about to say, "Love stands in contrast to the fear of isolated
4 human existence. It is expansive and all encompassing, never
5 small, contracted or guarded. It goes beyond all
6 circumstances, situations, never limited or produced by
7 anything of this world."

8 MR. LESKO: We're going to object.

9 THE COURT: Sustained.

10 Q You said on direct examination that Keith Raniere wrote
11 your wedding vows, correct?

12 A That's correct.

13 Q Do you recognize what I just read?

14 MR. LESKO: Objection.

15 THE COURT: Sustained.

16 Q Do you remember what your wedding vows were?

17 MR. LESKO: Objection.

18 THE COURT: You may answer.

19 A Honestly that's a trick question, because you just read
20 them.

21 Q I don't want to get you in trouble.

22 MR. LESKO: Objection.

23 THE COURT: I'm sorry?

24 Q I told him, I thought he was about to answer --

25 THE COURT: It's not a conversation. Only answer

1 the questions that I allow you to answer.

2 Next question.

3 Q So Keith Ranieri wrote your wedding vows?

4 A That's what I believe. For certain, I don't know, that's
5 what I believe.

6 Q You recall testifying on direct examination that Keith
7 Ranieri wrote your wedding vows?

8 A Absolutely. But I also don't know if that is actually
9 what happened. To the best of my knowledge, yes.

10 Q I think you also testified on direct examination that at
11 one point Pam Cafritz said to you she hoped you and Keith
12 would you friends. Do you remember that?

13 A I recall she did say that.

14 Q Where were you when she said that to you?

15 A I think it was one of the streets in Knoxwoods, I think
16 it was. We were outside, I think.

17 Q Did you know Pam?

18 A I mean I spent a lot of time with Pam. I have to define
19 "know". I spent time with her.

20 Q You spent a lot of time with her?

21 A A fair amount, yes.

22 Q Did you spend time with Pam and Keith together?

23 A Yes.

24 Q And you saw their relationship, correct?

25 A I saw, I saw the way they related to each other.

1 Q Which is how?

2 A She was very differential, and she looked like she would
3 take care of everything he needed.

4 Q And when she said to you that Keith doesn't have a lot of
5 male friends maybe you could be his friend?

6 A Uh-huh.

7 Q You have to answer yes or no.

8 A I didn't know what the question is yet.

9 Q You and Keith did become friends?

10 A I thought so.

11 Q And Pam didn't say to you, you should get to know Keith
12 so you can be differential to him. She said, because he
13 doesn't have a lot of friends, maybe you can be his friend?

14 MR. LESKO: Objection.

15 THE COURT: Sustained.

16 Q The only thing that she talked about during that
17 conversation was that you and Keith could be friends, right?

18 A I don't know if that's the only thing we spoke about, but
19 I do recall her saying that.

20 Q At some point I think you said on direct examination that
21 Nancy Salzman and Barbara Bouchey told you that they admired
22 your film, What The Bleep Do We Know; fair to say?

23 A Yes.

24 Q The movie is about science and spirituality, is that a
25 fair way to put it?

1 A Yes.

2 Q And that they are essential realities to each of us but
3 we don't always see what those are; is that fair
4 characterizations? I'm talking to the man who made the movie,
5 I realize. What would you say the movie is about?

6 A I think it was trying to draw the connections between
7 mind, spirits and reality. It's something that I'm not, I
8 don't sell anymore. But the idea that your consciousness
9 effects reality. It was a phase I was going through.

10 Q You said that was it Nancy Salzman and Barbara Bouchey
11 who flew to Oregon and saw you in southern Oregon?

12 A No. Nancy Salzman and Barbara Bouchey flew to LA to meet
13 me the first time. It was Nancy Salzman and Sarah Bronfman
14 that flew to southern Oregon.

15 Q Which was first, the LA trip for the Oregon trip?

16 A LA was first.

17 Q That was the first time you ever met anyone from NXIVM?

18 A I believe so.

19 Q What did you talk about?

20 A Well, as you said, they said that they admired the film.
21 And they said that the things that you hypothesize in the
22 film, we can do, we know how to do what you're talking about.

23 Q Did you understand what they meant by that?

24 A Not entirely. But I assumed because we were looking at
25 the biochemistry of emotionality and how one could make a

1 change. And the film didn't offer any specific methodology,
2 and Nancy Salzman said our methodology can do that.

3 Q And this conversation happened over the course of a
4 single day or more than one day?

5 A That conversation was sort of a tee of an hour or two,
6 and then in the hour we continued the conversation.

7 Q And then there was a second conversation that took place
8 in Oregon, am I right about that?

9 A A few weeks later, yes.

10 Q And do you recall -- and who was there exactly in the
11 Oregon conversation?

12 A That was Nancy Salzman and Sarah Bronfman.

13 Q What did you talk about during that conversation?

14 A They spoke a lot more about the modality, which I didn't
15 completely understand at the time. They asked me a lot of
16 questions about what I wanted in my life, what my deepest
17 dreams were. They suggested that perhaps they could help me
18 have those things or create those things. They thought it was
19 important that I at least experienced the model and that I met
20 their mentor.

21 Q What did you want to, do when you say they discussed with
22 you your deepest dreams, what did you tell them you wanted to
23 do?

24 A To make the world a better place.

25 Q How were you going to go about doing that?

1 A I hoped to make films that could effect people deeply
2 enough that they would behave in such a way that they would
3 make the world a better place.

4 Q They told you in essence that they would support your
5 film making endeavors so you could do this, correct?

6 A Yes, and also help me become, I don't know if this is the
7 correct word, smart enough to do that.

8 Q I think on direct examination you told us about an
9 example, that your girlfriend at the time had a dairy allergy?

10 A Yes, at the time. And Nancy Salzman did what I later
11 found out was an EM.

12 MR. LESKO: Objection, your Honor.

13 THE COURT: Sustained.

14 Q What did Nancy -- tell us what Nancy Salzman did?

15 MR. LESKO: Objection.

16 THE COURT: Scope?

17 MR. LESKO: Yes.

18 THE COURT: Sustained.

19 Q You discussed on direct examination that Nancy Salzman
20 spoke to your girlfriend at the time and made her tearful,
21 right? Do you remember saying that on direct examination?

22 A Yes.

23 Q What did she do?

24 A She had a conversation with her, which I didn't
25 understand at the time. And then said to her, you know, stay

1 off dairy for a day, 24 hours, then try to reintroduce it and
2 see what happens.

3 Q Did it work?

4 A It seemed to work. She tried little portions, seemed
5 fine. I actually I don't recall, I don't recall if she just
6 went crazy and had a lot of dairy or just stayed away, I don't
7 recall that. But I recall that 24 hours later she introduced
8 a small bit of cheese and she didn't have the reaction.

9 Q You said on direct examination that Nancy Salzman said
10 things to your girlfriend that made her tearful, what
11 specifically did she say?

12 A I have no idea.

13 Q And you were there for this, correct?

14 A I was.

15 Q What did you observe?

16 A Them talking, Nancy Salzman was asking her questions. It
17 was in a restaurant.

18 Q What was your girlfriend at the time doing?

19 A I think listening and I think answering some of the
20 questions.

21 Q Did you she start crying?

22 A Yes.

23 Q And for how long a period of time was she crying, if you
24 could remember?

25 A Less than a minute maybe.

1 Q Then she didn't have dairy for a day. And then you
2 recall she had small amounts of dairy and didn't have the same
3 problem?

4 A Yes. I don't recall if she went crazy and had a lot of
5 it.

6 Q I think you said on direct examination that you were
7 impressed by that; is that right?

8 A I was.

9 Q Why were you impressed?

10 A My experience of people trying to help with allergies, I
11 mostly had seen a lot of lack of success. And I was surprised
12 that it could happen that quickly, if indeed it did work, that
13 it could happen that quickly. I was surprised by that. I was
14 mystified by the nature of her questions. I couldn't
15 understand at the time what was happening.

16 Q You spoke on direct examination about a lot of different
17 groups within NXIVM, there was Jness, correct?

18 A Yes.

19 Q Remind the jury what is Jness?

20 A Jness was, we were told, a movement to help women truly
21 understand themselves. Raniere had suggested that they define
22 everything in terms of men, instead of trying to find things
23 in terms of being a women. And that even the word woman had
24 man in it. I think that's why the name Jness came up.

25 Q There was a Jness room; is that right?

1 A There was a Jness -- yes, it was an apropos.

2 Q What is your understanding of that?

3 A No man was allowed to enter or even look at it; it would
4 somehow effect things. I just never went in, so I don't know
5 what it looked like.

6 Q Then there is SOP that we discussed at some length so
7 far, correct?

8 A Uh-huh.

9 Q That was the men's group?

10 A Yes.

11 Q And that was created after Jness, fair to say?

12 A Yes.

13 Q So Jness was first, then SOP came later on?

14 A Yes.

15 Q Then after the creation of SOP there was SOP Complete
16 right?

17 A Yes.

18 Q And just tell us again what is the difference between SOP
19 and SOP Complete?

20 A SOP was purely men; and SOP Complete was adding women
21 into the equation. I think the word complete came from, I was
22 told, was somehow that a man a woman makes completion, that
23 makes the idea SOP Complete.

24 Q You talked about ethicist. Remind us what ethicist is?

25 A My understanding is ethicist was a curriculum to create

1 somebody called an ethicist. This is was a hypothesized
2 career path in the world. These people would be able to work
3 in the highest levels of Government and very powerful
4 positions to help people resolve things. That in order to
5 become the person that could think ethically, they would have
6 to resolve all their own internal ethical discrepancies.

7 MR. AGNIFILO: I know it's 1:00 o'clock, does the
8 Court want to take a break?

9 THE COURT: Sure. We'll take a hour lunch. Please
10 rise for the jury.

11 (Jury exits the courtroom.)

12 THE COURT: The witness may step down. Don't
13 discuss your testimony with anyone. We'll take an hour lunch.

14 (Whereupon, the witness steps down.)

15 MR. LESKO: Your Honor, could we discuss a matter
16 briefly?

17 THE COURT: You may be seated.

18 MR. LESKO: Your Honor is well aware of the fact
19 that defendant's counsel has indicated he would provide
20 impeachment material to the Government after the direct
21 examination of our witnesses.

22 THE COURT: Yes.

23 MR. LESKO: We inquired of the defense as to whether
24 there was any additional material, other than some that had
25 been provided to us. I would note, and I don't think I

1 misplaced it, we never received Defense exhibit 332.

2 It's particularly troubling, as your Honor is well
3 aware, Rule 612 provides if writings are used to refresh a
4 witness's memory that writing has to be provided to the
5 adverse party. We've requested this impeachment material. It
6 was specifically used in a Rule 12 context. It was not
7 provided. The first time I saw it was on the screen when it
8 was shown to the witness.

9 I'm inquiring of the Court to now direct the defense
10 to provide the Government with any material it's going to use
11 in particular any 612 material.

12 It's patently unfair. It's against the back drop of
13 multiple requests, many of which have been made on the record.

14 MR. AGNIFILO: First of all, we sent it on May 13.
15 We have an e-mail.

16 Second of all, Rule 612 does not say anything about
17 giving the material ahead of time. It's a rule of a trial
18 examination while the examination is going on, that I can't
19 have a witness refresh his recollection based on something
20 unless I give it to the adverse party at the time that I'm
21 using it to refresh his recollection. So it's an absolute
22 misstatement of Rule 612.

23 But more to the point, we gave it over days ago. So
24 we don't have to give over Rule 612 material days ago and we
25 did it any way.

1 MR. LESKO: I'll go check the e-mail. I don't have
2 it in my stack of materials. I will say, under any scenario I
3 don't think it's appropriate for me to see the document that's
4 being used to refresh the witness's recollection at the time
5 that's happening. I don't want to get into all the aspects of
6 Rule 612, but it does provide that a party has to make that
7 document available to an adverse party prior to using it to
8 refresh the witness as recollection.

9 The cat is out of the bag. The reason I'm bringing
10 it up is so in the future we don't want to be sand-bagged with
11 documents that we haven't seen, that haven't been produced.
12 I'm just worried that this is going to start a trend of using
13 documents that aren't produced to the Government, at least
14 after direct examination of our witnesses.

15 THE COURT: Wasn't this --

16 MR. AGNIFILO: There is no obligation, nor has there
17 ever been, that we have to produce documents to them. They
18 are combining things, and it's not right.

19 Rule 612 is at the time that the witness is looking
20 at the document. That's first.

21 Second of all, we gave it over.

22 And third of all, we don't have an obligation. So
23 we don't get into a sandbag situation because it's
24 cross-examination. We get to --

25 THE COURT: But it's impeachment material, you're

1 acknowledging it's impeachment material.

2 MR. AGNIFILO: I don't think it's impeachment
3 material, per se. I asked the witness --

4 THE COURT: Well, how do you define impeachment
5 material?

6 MR. AGNIFILO: Undermines the credibility of the
7 witness, surprises the witness. We don't have to give
8 impeachment material ahead of time; that's why its impeachment
9 material. This is not impeachment material. This is a
10 witness saying I don't remember saying this, I don't remember
11 this event. I show him the document. He says, now I remember
12 it. He says it to the jury. At a time when the prosecutor is
13 staring at the same document, the witness is staring at, which
14 is all 612 requires.

15 MR. LESKO: Your Honor, I'm not looking for any sort
16 of curative action with respect to this. We got through it.
17 It's done. I'm saying, in the future we are requesting on the
18 record that the material, in particular impeachment material,
19 be provided to the Government after the direct examination of
20 the witness, before cross-examination. That's it. Simple.

21 THE COURT: You don't agree with that.

22 MR. AGNIFILO: No, we don't. Impeachment material
23 absolutely doesn't. We are doing it out of the goodness of
24 our heart. And let me tell you something, that's the last
25 time I do that. We're doing this out of the goodness of our

1 heart.

2 Your Honor has had trials for 18 years.

3 THE COURT: Nineteen.

4 MR. AGNIFILO: I don't want -- 19 years. How many
5 times --

6 THE COURT: We're fast approaching my 19th
7 anniversary, I consider it 19 years.

8 MR. LESKO: If I may also, your Honor, Mr. Agnifilo
9 is calling this impeachment material, but in our view what he
10 calls impeachment material in our view is case in chief
11 material. For efficiency sake I'm sure that some of that
12 material will be used by the defense, and while the witness is
13 here there is no reason to recall Government witnesses after
14 we're done.

15 THE COURT: I understand that.

16 MR. LESKO: So think it's just, take this on a case
17 by case basis, I actually do not agree with the
18 characterization that all this material is only impeachment
19 material; and therefore, if it's case in chief material then
20 it should have been disclosed already under Rule 16. We
21 haven't received any Rule 16 disclosures.

22 So I'm just bringing this to the Court's attention.
23 I think it's going to be an issue throughout the trial. This
24 is first instance where it's really coming to a head.

25 MR. AGNIFILO: We gave it to them days ago. I don't

1 know what they did with it. We gave it. We'll show them how
2 we gave it to them.

3 Second of all, I dispute this being case in chief.
4 Case in chief has something to do with my choice, the
5 witnesses I choose to call, witnesses that I know about more
6 than 48 hours ahead of time, witnesses that I have spoken to
7 before they get on the stand. This trend one day is going to
8 get stopped dead by the Second Circuit when the Second Circuit
9 says, case in chief means your case. It doesn't mean stuff
10 you heard about 48 hours before it happens. It doesn't mean
11 witnesses you have no control over that you don't call, it's
12 Rule 16. It's my case in chief.

13 This is not my case in chief, this is my cross
14 examining a Government witness. It's particularly galling
15 that we gave them the stuff and that we're still having this
16 discussion.

17 No curative action, of course no curative action, we
18 have not done anything wrong. I think that they are trying to
19 expand Rule 16 into places that the Second Circuit at some
20 point, I hope that day comes soon, is going to say is not Rule
21 16. This is not Rule 16.

22 I have no control over this witness. They called
23 him. And they covered all these things. They are trying to
24 hem me into a very narrow bandwidth, Judge, in terms of what
25 is beyond the scope of direct. And the truth is, they got it

1 all of it. This witness testified for many, many hours.

2 THE COURT: You got your questions answered. Don't
3 argue with success.

4 MR. AGNIFILO: I'm not arguing.

5 THE COURT: You are. You want to -- you're trying
6 to reargue something where you got the answers to your
7 questions, right? Right. Sit down.

8 MR. AGNIFILO: Yes. Thank you, Judge.

9 THE COURT: All right. If it's case in chief
10 material if you're trying to expand the discussion to new
11 subjects, that's case in chief. And I'm happy to follow the
12 Second Circuit right down to the last period, comma and
13 question mark. But until word comes from Olympus, that will
14 help me and you, I have to sort of find my way. Just like
15 Demosthenis, with my lamp and the darkness.

16 All right, I'm doing the best I can and you need to
17 do it too. Let's have lunch.

18 (Lunch recess.)

19 (Continued on next page.)

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1 A F T E R N O O N S E S S I O N

2 (Time noted: 2:00 p.m.)

3 (In open court; Jury not present.)

4 THE COURT: Okay. Please be seated.

5 (Defendant enters the courtroom.)

6 THE COURT: Oh, if the witness is going to be shown
7 the document to refresh his recollection, for instance, a
8 paper copy of the document should be provided to the other
9 side and to me. Because doing it on the screen, you know, in
10 the first instance, is very difficult. So I prefer if we did
11 it that way in the future.

12 MR. AGNIFILO: Okay.

13 THE COURT: Okay. Thank you very much.

14 MR. AGNIFILO: Yes.

15 THE COURT: Just more work for Ms. Geragos, but
16 since she's not doing the cross, I think she can handle it.

17 MR. AGNIFILO: It's like a Cyrano de Bergerac, she
18 sort of is and she isn't.

19 THE COURT: I see. Good to know.

20 Okay. Let's bring the witness in please.

21 (Witness resumes the stand.)

22 THE COURT: Okay. Ready?

23 MR. AGNIFILO: Yes, Judge.

24 THE COURT: Bring the jury in please.

25 (Jury enters the courtroom.)

1 THE COURT: Please be seated everyone.

2 Okay. Mr. Agnifilo, you may continue your
3 cross-examination of the witness.

4 The witness is reminded he is still under oath.

5 THE WITNESS: Yes, Your Honor.

6 CROSS-EXAMINATION (Continued)

7 BY MR. AGNIFILO:

8 Q Good afternoon, Mr. Vicente.

9 A Good afternoon.

10 Q You spoke on direct examination about something called
11 the source. Now, the source was an acting curriculum within
12 NXIVM; is that right?

13 A Yes.

14 Q Okay. And I think you said on direct examination sort of
15 a different kind of acting curriculum than the typical acting
16 curriculum.

17 Do I have that right?

18 A Yes.

19 Q Okay. And just tell the jury why that's so.

20 A My understanding of -- well, certainly the curriculum
21 that I had done in my life was what I called the inside out
22 approach; you know, the feel within deeply, reference the
23 thing in your life, and then express it, you know, the best
24 way you can to communicate to the audience.

25 And this was more of a, what I call the outside in

1 approach, you know, find the specific things that a person
2 does that match an emotion. You know, focus on those.

3 There was also things related to like I call the
4 inner engineering of like how you, you know, build emotions.
5 That was different.

6 Q And there were a number of actors and actresses that were
7 in NXIVM and enrolled in the source; is that true?

8 A Yes.

9 Q Now, did you have to be sort of a working or an
10 experienced actor or actress to take the source or to be in
11 the source?

12 A I don't believe so.

13 Q Do you know if Keith Raniere had an acting background?

14 A I believe he said he was in some school plays. I think
15 he said at one point he had played in Sweeney Todd.

16 Q Okay. In school, you know, high school, college; do you
17 know?

18 A I actually don't know for sure.

19 Q You talked on direct examination about Rainbow Cultural
20 Gardens. Just remind the jury what that is again.

21 A Rainbow Cultural Gardens was two things that I
22 understand. The one was Raniere spoke about in children
23 windows of opportunity that were open for a certain period of
24 time for them to learn certain things. The program was to
25 help the children keep those windows open longer than normal

1 and also to give them a multicultural, multi-linguistic
2 experience that would have people around them that spoke
3 multiple languages. That's my general understanding.

4 Q And for instance, within Rainbow Cultural Gardens, there
5 were fluent speakers in Arabic, correct?

6 A There was two that I recall, yes.

7 Q And so one of the languages that was available to the
8 children in Rainbow was they could learn Arabic at a very
9 young age, for instance?

10 A I believe so.

11 Q And do you know if that's true for Hindi as well?

12 A I actually don't recall.

13 Q And Spanish?

14 A Spanish, yes.

15 Q Russian?

16 A Yes, Russian.

17 Q Mandarin?

18 A Yes.

19 Q Thai?

20 A I don't know.

21 Q Cantonese?

22 A I actually don't know.

23 Q German?

24 A I believe so.

25 Q French?

1 A I don't recall French.

2 Q Japanese?

3 A Yes.

4 Q And a language that I am going to mispronounce, but
5 you'll help me, I think it's from South Africa? Xhosa?

6 A Xhosa.

7 Q Okay. And what is that? What is that language?

8 A It's one of the languages wax in Southern Africa.
9 There's many. That's is one of them.

10 Q Do you know if that was taught as part of Rainbow
11 Cultural Gardens as well?

12 A I actually don't know. I just know there was somebody in
13 the community that spoke that language.

14 Q Okay. And fair to say that the philosophy behind Rainbow
15 Cultural Gardens was to give kids -- make kids comfortable
16 with many different languages, right, at an early age?

17 A That's my understanding.

18 Q So that they would have a deeper awareness of the
19 cultures of the people who spoke those languages?

20 A Yes.

21 Q And this was a way of bringing peace, right? And it
22 wasn't the idea that --

23 MR. LESKO: Objection.

24 THE COURT: Well, that was a statement, not a
25 question.

1 MR. AGNIFILO: All right.

2 THE COURT: Form a question.

3 MR. AGNIFILO: Yes. Yes.

4 BY MR. AGNIFILO:

5 Q What was your understanding that part of the point wasn't
6 just that the kids were going to learn languages; that the
7 kids would have a greater appreciation for the cultures of the
8 people who spoke those languages because they themselves also
9 would come to speak those languages?

10 A Yes.

11 Q Now, you spoke on direct examination about intensives.
12 And there are intensives of different duration in terms of
13 number of days?

14 A Yes.

15 Q All right. And what are the different number of days
16 that an intensive could be?

17 A An intensive could be five days. Could be 16 days.
18 Level 2s could be eight days. SOP could be six days. I think
19 Jness was eight days.

20 Q And I think you said on direct examination the days could
21 be very long, right? Long hours?

22 A Correct.

23 Q And what's your typical -- take us through a typical day
24 of an intensive. What time are you starting? What are you
25 doing? When are you breaking? You know, just kind of paint a

1 picture for us.

2 A Could you be specific which intensive? Because there are
3 so many.

4 Q What's a typical day if you are in the 10th day of a
5 16-day intensive?

6 A As I recall, breakfast could be 7:30 in the morning.
7 Start time could be 8:30. There were a number of modules
8 before lunch. There was a lunch break of I think it was
9 anywhere from an hour 15, maybe an hour and a half, depending
10 where it was held.

11 There were afternoon sessions and then depending on
12 the number of students, if there were many, many students, it
13 could go quite late. It could go, you know, up to like 10:00.
14 Maybe 11 p.m. If there were very few, it could go up to 7:00
15 or 8 p.m.

16 Q And is the typical module, if there's such a thing,
17 interactive, or is it a person just imparting information to
18 an audience?

19 A It's both. There are some, one person in front of the
20 room and then there's some that are interactive.

21 Q Okay. And it's your understanding that Keith wrote all
22 of the modules, prepared all of the modules; am I right about
23 that?

24 A That is my understanding.

25 Q All right.

1 A Well, he would speak, and spoken word would be recorded,
2 and then from that, there would be transcriptions made and
3 from that, I believe, the education was made.

4 Q Okay. So take us -- and you're aware of this because you
5 yourself would do some of the recording of these things,
6 correct?

7 A Yes. And then sometimes I would record and then
8 eventually I would, to some degree, have the experience
9 myself.

10 Q Okay. So take us through the process as you saw it.
11 Start, you know, Keith asks to you come over because he wants
12 to do what?

13 Tell us how the whole things starts.

14 A Well, in the case of the first time I saw the process, I
15 think was at V Week, and he was going to do what was termed
16 the download to Nancy Salzman. And I was shooting that.

17 Basically they would have a discussion about a topic
18 of some kind. He would ask her a series of questions. She
19 would give a series of answers, and he would then give her a
20 version of an understanding of those concepts or questions.
21 She would record it and she would make notes as well.

22 And then from that, she would go into the auditorium
23 where, in that case, there were many hundreds of people and
24 she would give -- hand the questions out and then during the
25 time that the questions were being discussed, I believe she

1 would arrange her notes and then give the debrief/disposition
2 and that would continue a few times until the final
3 disposition.

4 Q Okay. And is it your understanding that was about 2000
5 of these modules?

6 A That's what I was told, that there were around 2000
7 altogether.

8 Q Covering a wide variety of topics; fair to say?

9 A Yes.

10 Q Okay. He would talk at length about love, correct?

11 He being Mr. Ranieri?

12 A Yes, that was -- you know, anywhere from love to, you
13 know, principle ethics, you know, the darkness of humanity,
14 the lightness of humanity.

15 Q And he would speak them all in each instance as far as
16 you're aware, this would be a spoken act? He would actually
17 speak the consent of the module?

18 A Some of it, yes. But then later with SOP, he would
19 actually hand us the questions written down. That was
20 slightly different.

21 We wouldn't be given the information in the same
22 manner, but he would hand us the questions and then he would
23 just walk in front of the audience and then start talking.

24 Q And what is the approximate length of a typical module,
25 if there is a typical module?

1 A Generally, two hours plus.

2 So in the level ones, it was supposed to be two
3 hours, but they were generally longer actually.

4 Once you got to level twos, they could be a few
5 hours. Beyond just two.

6 Q And I think you spoke about the fact that you had sashes,
7 that people wear sashes around their neck, correct?

8 A In ESP, yes.

9 Q In ESP?

10 A Yes.

11 Q And it's like a martial arts type system; is that fair to
12 say?

13 A That's what I understood.

14 Q Okay. And did you have an understanding that the concept
15 was borrowed from martial arts?

16 A I was told that. So I -- I believe the assumption.

17 Q Okay. And Mr. Ranieri had the title of Vanguard, right?

18 A In ESP system, yes.

19 Q And do you have an understanding that that was also
20 borrowed from martial arts for their term sensei?

21 A I did not. No. I thought that was an original term.

22 There was a definition, I think it was leader of
23 philosophical movement, is what I was told it meant.

24 Q Right. I asked a bad question. Let me ask you a
25 different question.

1 No, the word Vanguard, but the fact that there is a
2 title. The fact that Mr. Ranieri has a title, sort of in the
3 official aspect of ESP.

4 A Yes, because that was talked about in one of the first
5 modules, you know, people had titles and corporations, and so
6 we were told this is just a title like that.

7 Q I want to ask you a few questions about a course
8 evaluation. I think you talked about that a little bit on
9 direct examination.

10 Fair to say that the students were asked to evaluate
11 the course, the instructor, and the curriculum, correct?

12 A At the very end of intensives, we were given a form to
13 evaluate this training and, in essence, rank all the
14 trainings.

15 Q All right. And often these evaluations were anonymous,
16 right?

17 A I don't recall in that case if they were or not.

18 Q But you do recall certain evaluations of course work
19 being anonymous.

20 A Yes. Yes.

21 Q And anonymous meaning the student sits for the course.
22 At the end of the course, the student fills out a
23 questionnaire on an anonymous basis so that no one knows who
24 is providing this critique of the course, correct?

25 A Yes.

1 However, you know, there was information that I
2 realized you could identify the person.

3 Q Okay. But it was -- and tell me what that was.

4 A Date of birth. You know, your schooling. How much
5 college you went to, that kind of thing.

6 Q And date of birth was on these forms?

7 A I believe it was on the forms, yes.

8 Q Are you sure?

9 A I'm actually not sure.

10 Q And -- but the idea is that if it's anonymous, and if the
11 student's name isn't on it, the student could be as critical
12 as the student wants to be, correct?

13 A Yes. Under that assumption, yes.

14 Q And these evaluations were maintained within the ESP
15 NXIVM, correct?

16 A I'm sorry, could you --

17 Q Were they kept? In other words, they weren't just thrown
18 in the garbage? They were --

19 A I actually don't know what happened to them.

20 Q Fair to say that Ranieri maintained virtually everything?
21 I mean, he was -- he was videotaped --

22 MR. AGNIFILO: Let me ask you this.

23 Q How many hundreds or thousands of hours did you think you
24 spent videotaping or audiotaping Keith Ranieri in the 12 years
25 that you and he were working together?

1 A I'm going to say thousands.

2 Q Okay. Many thousands of hours.

3 A I don't know how many, but it's, I mean, it's about a
4 thousand for sure.

5 Q And were you the only person performing that function?
6 Was there anybody else if you weren't available, or if you
7 were away, who else would perform the same function as you did
8 of recording Mr. Ranieri?

9 A One moment. Adrian, Ken. I think at times, Megan.

10 There were times when there was no crew available,
11 so I think it was just somebody in the upper ranks might do
12 it.

13 Q Okay. And your understanding was that all of this video
14 footage and all the audio recordings was all maintained,
15 correct?

16 A When you say maintained.

17 Q I mean kept. I mean, it was -- it was downloaded to some
18 device, some tape, or whatever --

19 THE COURT: You mean it was retained? Retained?

20 MR. AGNIFILO: Yes, retained is a better word, yes.

21 Q Let me ask you another question.

22 Did you have an understanding that all of this video
23 footage and all the audio recordings was retained by the
24 company?

25 A They were supposed to be retained, but there were some

1 issues which I was trying to help with, which was like a
2 better system.

3 Q Okay. And what were the issues?

4 A That there were boxes of tapes lying around that I felt
5 shouldn't be lying around. There should be some system of,
6 you know, codifying these, keeping them somewhere.

7 Q And in addition to the recording of what Mr. Ranieri was
8 saying and doing, fair to say there were people who were
9 basically going through the course work and breaking the
10 course work into topics?

11 A Yes, that would be -- the forum review teams were doing
12 that.

13 Q Okay. Just tell us what the forum reviews did.

14 A I never did it, so I'll just give you my version.

15 They would sit in forums and they would listen to
16 what he said, and then they had a system of some kind of
17 categorization. It was a very complex Excel sheet, and they
18 would make note of everything like jokes. They would make
19 note of like the jokes, or make note of certain major topics
20 that he talked about. And I think they would notate the time
21 as well.

22 And then they would go -- at the end, they would all
23 meet and then I believe collate everything together, I think
24 into a single document, that would refer to that -- that
25 forum.

1 Q Okay. So if I, for instance, wanted to know everything
2 that Keith Raniere said about a certain topic, I could have a
3 decent chance of finding that, because it's all been kind of
4 collated and kept?

5 A With the forums, yes. I'm not sure about other things.
6 Because the forum reviews only happened with the forums.

7 Q Okay.

8 MR. AGNIFILO: One second.

9 (Pause.)

10 Q I have a question for you.

11 You said you didn't recall if on the anonymous
12 questionnaires, if there was dates of birth.

13 A I thought there were.

14 Q Okay. If -- hold on.

15 (Pause.)

16 THE COURT: At the break we'll make copies for you.

17 BY MR. AGNIFILO:

18 Q Mr. Vicente, I'm just going to show you, just for you and
19 the Court and the lawyers, a typical anonymous questionnaire
20 and all I'm going to ask, I am going to ask you to look it
21 over and then I'm going to ask you a couple of questions.

22 MR. LESKO: Can we have a sidebar briefly?

23 (Continued on the next page.)

24 (Sidebar conference.)

25

1 (The following occurred at sidebar.)

2 MR. LESKO: Your Honor, we're not objecting to use
3 of Defense Exhibit 343 to refresh the witness' recollection,
4 but we are objecting to counsel's characterization of the
5 form. We don't know if this was a typical form or it wasn't.
6 If the witness --

7 THE COURT: You can ask him.

8 MR. AGNIFILO: Yes, I'll ask him.

9 THE COURT: That's fine.

10 MS. PENZA: For refreshing his recollection, he
11 should show it to the witness without any making sort of
12 characterization about what he is showing.

13 You can refresh with anything, but to have like the
14 announcement that this is typical questionnaire --

15 THE COURT: Yes, right.

16 No, I agree with that. Just show it to him.

17 MR. AGNIFILO: Yes, I'll do that.

18 THE COURT: Please look at this --

19 MR. AGNIFILO: Yeah, yeah.

20 THE COURT: -- this paper, does this refresh your
21 recollection.

22 And if he says, yes, then you can ask him the
23 question again.

24 So just going to do it that way.

25 MS. PENZA: Thank you.

SIDEBAR CONFERENCE

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1 MR. AGNIFILO: Thank you.

2 THE COURT: Thank you everybody.

3 (End of sidebar conference.)

4 (Continued on the next page.)

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1 THE COURT: Okay. You may continue.

2 (In open court; Jury present.)

3 BY MR. AGNIFILO:

4 Q Mr. Vicente, I'm going to show you a three-page document.
5 Read it over to yourself and I'll move it up as you need me
6 to.

7 A Okay.

8 (Whereupon, the witness is reviewing the document.)

9 MR. AGNIFILO: We have to put on the Elmo part.

10 THE COURT: Sure. There you go.

11 BY MR. AGNIFILO:

12 Q Mr. Vicente, you tell me when you're ready for me to move
13 it.

14 THE COURT: Do you see it?

15 THE WITNESS: I do.

16 THE COURT: Good. All right.

17 (Whereupon, the witness is reviewing the document.)

18 MR. AGNIFILO: That's the first page.

19 Here's the second page.

20 (Whereupon, the witness is reviewing the document.)

21 A I remember the document.

22 Q Okay.

23 Do you remember if there was any of birth or other
24 identifying information?

25 A On this particular one, I don't think there was. But

1 there were a number of documents that were filled out at the
2 end of the intensive. This is only one of them.

3 Q But this was an anonymous questionnaire, correct?

4 A That's my understanding.

5 Q Thank you, sir.

6 Do you recall one of the questions being whether the
7 course was worth the money?

8 A Yes, I believe so.

9 Q Now, I want to talk about feedback. Feedback is one of
10 the things I think you discussed on your direct examination.

11 A Uh-huh.

12 Q And tell the jury again, what is feedback?

13 A Feedback was supposed to be helping a person see
14 something that they couldn't see about themselves, or even if
15 they could see it, but were defiant in some way to tell them
16 what the issue was.

17 Q And in -- I think what you said is that at the proctor
18 level, or senior proctor level, you have to accept the
19 feedback? You can't reject the feedback?

20 A At a senior proctor level, you'd have to take feedback.

21 Q Okay. For people that are lower than that level, do
22 people have the option of having -- giving themselves like a
23 feedback number?

24 A In the first intensive as a white or a student, yes. I
25 don't remember, actually, if that -- that existed after that.

1 But the whites could give a number.

2 Q So in other words, if I didn't want feedback, if I didn't
3 want people kind of telling me about me, I could give myself a
4 feedback number where I didn't have to the hear that, if I was
5 a white, correct?

6 A Yeah, you could say, you know, zero.

7 Q Okay. So my feedback number is zero. No one's going to
8 confront me with any aspects of me if I have a feedback number
9 of zero, correct?

10 A That's the theory. I don't know that anyone ever did
11 that.

12 Q Right. And what's the highest feedback number?

13 A I think it was a hundred or ten.

14 Q Okay. So if I gave myself the hundred or the ten, I'm
15 basically saying I'm open season.

16 A Fair game. Fair game.

17 Q I'm fair game.

18 You have something to say about me, I have given
19 myself a number where I'm going to have to hear it, right?

20 You have to answer.

21 A Sorry. Yes.

22 Q And so the person at the lower level could chose whatever
23 level of feedback they wanted, or didn't want, by the number
24 that they assigned to themself; am I right?

25 A Yes.

1 Q Now, I think you said on direct examination that feedback
2 was to be taken as true; am I right about that?

3 A Yes, the philosophy was all feedback is true.

4 Q Okay. And is that because this is a therapeutic system.
5 So the question isn't really what's happening on the outside
6 world, the question is what's happening inside of you, right?

7 Is that your understanding?

8 A Could you ask it again or in a different way? I'm a
9 little confused.

10 Q Someone came up to me and said I hate your tie.

11 A Uh-huh.

12 Q That's my feedback. I hate your tie.

13 A Uh-huh.

14 Q And I feel bad about that. The feedback wouldn't be
15 about whether the other person was mean in saying that to me.
16 The feedback would be why do I feel bad that this person said
17 they hated my tie, right?

18 A I'm sorry. I'm struggling to understand what you're
19 saying. I'm not being --

20 Q Feedback is designed --

21 THE COURT: Wait.

22 MR. AGNIFILO: I'm sorry, Judge.

23 THE COURT: Let him finish what he says and then
24 talk.

25 A I'm struggling to process what your saying, sir.

1 Q I'm going to start again. Okay? I'm just going to start
2 again.

3 Feedback is meant to help the person getting the
4 feedback, right?

5 A That's what it's supposed to be.

6 Q Okay. And the idea is that the person has a reaction to
7 the feedback, a negative reaction to the feedback, to work on
8 why the person's having a negative reaction to the feedback,
9 right?

10 A So the reaction, yes. The reaction is the problem.

11 Q Right. The reaction is the problem. Not the content of
12 the feedback. Right?

13 A It's A little more complex than that.

14 Q Okay. Go ahead.

15 A Because if the person's giving feedback in a problematic
16 way, it could also be the person giving feedback that's the
17 problem, and, you know, those things would be open to
18 arbitration.

19 But at a higher level, you took it. You took the
20 hit and it's all about you. And you don't look at the other
21 person at all. Like you don't question their motives. You
22 just take the hit. It's true. And you deal with it and you
23 change the thing you're supposed to change.

24 Q Okay. Now, you talked on direct examination about the
25 NXIVM 9.

1 Do you remember that?

2 A Yes.

3 Q Okay. And this was a group of people that level NXIVM in
4 2009?

5 A I believe it's 2009, yes.

6 Q All right. And the people who ended up leaving had
7 grievances with NXIVM or ESP; am I right?

8 A That's my understanding.

9 Q And I think you talked on direct examination and said
10 that Keith listened to their grievances; am I right?

11 A I know that he listened to at least an hour of it,
12 because that was recorded. He told me that he listened to a
13 number of hours of their concerns.

14 Q Okay. But an hour you know firsthand because you
15 recorded it yourself?

16 A I did not.

17 Q Okay. How do you know then that that he listened to a
18 hour?

19 A The videos was, I don't remember where, but the video
20 was -- was posted somewhere. I remember watching it and I
21 remember there was a discussion between him and I think it was
22 nine women, I think.

23 Q I didn't hear the last --

24 A I think it was nine women that he was talking to.

25 Q Okay. And after listening to the grievances, he made

1 drastic changes to the executive board; am I right?

2 A After they left, yes. After they left, he reshuffled the
3 executive board, correct.

4 Q And what were the changes that were made to the executive
5 board?

6 A Well, Barbara Bouchey had left, so naturally she wasn't
7 on the executive board anymore. Some people dropped out and a
8 new executive board was created.

9 Q And did Keith remove himself from the executive board?

10 A I actually don't -- I don't know that he was part of the
11 executive board.

12 Q Okay. So, but after the NXIVM 9 had left, Keith was not
13 a member of executive board, you just don't know if he was one
14 beforehand?

15 A Correct. I mean, he was above the executive board, but
16 not a direct member of the executive board.

17 Q Do you know if Nancy Salzman was removed from the
18 executive board?

19 A I can't be sure, but she wasn't part of the new executive
20 board.

21 Q Now, at one point when the NXIVM 9 left, they made a
22 demand for money; am I right?

23 A My understanding was that they were owed certain monies.
24 They were asking for the monies back.

25 Q Okay. Did you tell anyone that you thought they -- that

VICENTE - CROSS - MR. AGNIFILO

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1 certain member of NXIVM 9 were committing extortion against
2 Raniere and NXIVM?

3 A I can't recall if I told anybody. I know I was told
4 that. But I can't recall if I told other people.

5 Q Do you remember writing a letter to the district attorney
6 of Saratoga County?

7 A I do recall doing that.

8 Q Do you remember what you said in the letter to the
9 district attorney of Saratoga County?

10 A I think I said something to the effect of that these
11 people had damaged the business. The company. And it also
12 damaged my ability to enroll people. I believe I said --
13 that's what I do remember.

14 Q Now, when you wrote the letter it's The Honorable James
15 A. Murphy III, the sitting district attorney at the time of
16 Saratoga County.

17 A Uh-huh.

18 Q You wrote a letter and you told the district attorney of
19 Saratoga County that Barbara Bouchey committed the crime of
20 extortion.

21 Do you remember that?

22 A I don't, but that sounds consistent with the kind of
23 thinking I may have had then.

24 Q I'm going to show you what's been marked as 327 for
25 identification --

VICENTE - CROSS - MR. AGNIFILO

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1 MR. AGNIFILO: And we'll implement the procedure
2 right now, Your Honor, and I'm just going to ask, for the time
3 being, that it be shown to the witness.

4 And there's no question at the moment.

5 327.

6 BY MR. AGNIFILO:

7 Q Do you recall writing this letter?

8 A I do.

9 Q And I want to show you the second page.

10 Do you recall signing this letter?

11 A I do.

12 MR. AGNIFILO: Your Honor, we offer it.

13 MR. LESKO: Objection.

14 THE COURT: Sustained.

15 Q This was essentially making a report, an official report,
16 to law enforcement that a crime had been committed; am I
17 right?

18 A That is -- that is my understanding.

19 Q Okay. This wasn't a casual letter, a friendly letter,
20 this was you writing a letter to the district attorney of
21 Saratoga County reporting a crime, right?

22 A As directed, yes.

23 Q That's what you did.

24 How old were you when -- how old were you on
25 October 26, 2010?

1 A 2010? 45.

2 Q You're a 45-year-old-man. You're writing a letter to a
3 district attorney saying that a certain person has committed
4 the crime of extortion; am I right?

5 A That is what that letter says.

6 Q And you -- you sent this letter to the district attorney;
7 am I right?

8 A I don't recall if I sent it or if I handed it over to
9 somebody.

10 Q You understood that when you wrote and you signed this
11 letter, to the sitting district attorney of Saratoga County
12 saying that Barbara Bouchey committed the crime of extortion,
13 that that was going to be sent one way or another to the
14 sitting district attorney of Saratoga County for his
15 consideration, right?

16 A That was my understanding.

17 Q And what you said, basically, am I right, is that Barbara
18 Bouchey was extorting money from NXIVM; am I right?

19 A That was my understanding.

20 Q You pointed out that you worked for NXIVM, right?

21 A I did.

22 Q You indicated that you had knowledge of these events; am
23 I wrong?

24 A Can I read the letter again before I answer that
25 question?

1 Q I'm going to show you -- we'll do it the way we've been
2 doing it. I'll show you the -- first, top part.

3 Please tell me when you want me to move it.

4 (Whereupon, the witness is reviewing the document.)

5 A Would you continue?

6 Q Yes.

7 (Whereupon, the witness is reviewing the document.)

8 A I've lost my image.

9 Q It's back. Oh, okay.

10 A Can I see the second page?

11 Q Of course.

12 (Whereupon, the witness is reviewing the document.)

13 A Can I see the first page again?

14 Q Of course.

15 (Whereupon, the witness is reviewing the document.)

16 Q If you want me to move it, you just tell me.

17 A I don't see where I said I have specific evidence or
18 knowledge.

19 Q You do say -- you say that: Since the -- her extortion
20 attempt, she has contacted many of your business associates,
21 right? You say that?

22 A She -- she had contacted and them, yes, but --

23 Q Just listen to the question.

24 A Sure.

25 Q What you say to the district attorney is that: Since the

1 extortion attempt, she has contacted many of your business
2 associates, right?

3 A Yes.

4 Q Did you not know that?

5 A That she had contacted?

6 Q Yes.

7 A I knew that she had contacted some of them, yes.

8 Q Because they told you, right?

9 A Yes.

10 Q Okay. And then you go on to say: Attempting to dissuade
11 them from doing business with me.

12 That's what you say to the district attorney,
13 correct?

14 A Yes.

15 Q Did you know that or are you just saying that for some
16 other reason?

17 A That I knew, that she was suggesting that people
18 shouldn't continue enrolling.

19 Q And you told the district attorney that this has resulted
20 in a loss of hundreds of thousands of dollars for you and
21 millions for the company, right?

22 A Yes.

23 Q Is that true?

24 A I don't recall if I was talking of potential or actual
25 damages in that, you know, one-year period.

1 Q When writing a letter to a district attorney and
2 implicating someone in a serious criminal offense, you would
3 want to be careful, wouldn't you?

4 A Yes. And I trusted a great many people in my actions,
5 yes.

6 Q And what you're telling us here is that the words we just
7 talked about, about her contacting your business associates,
8 Barbara Bouchey telling your business associates not to do
9 business with you, you're telling us you had personal
10 knowledge of that, right?

11 A Of that I had personal knowledge, I don't recall --

12 Q The answer is only to that: You had personal knowledge
13 of that, right?

14 A Of those two items?

15 Q That's all I'm asking right now.

16 A Yes. Those two items, yes.

17 Q You tell the district attorney that: Barbara Bouchey has
18 been unhindered by legal system, right?

19 A Yes, I was told that the legal system --

20 Q I'm just simply asking you about what you wrote, okay?

21 A Okay.

22 Q When you wrote to the district attorney that: Barbara
23 Bouchey had been unhindered by the legal system, what were you
24 conveying the district attorney?

25 MR. LESKO: Objection.

1 THE COURT: You may answer.

2 A That I was conveying, I believe, that the legal system
3 was not doing what it should do.

4 Q You then go on to say that: Barbara Bouchey has
5 flagrantly slandered Nancy Salzman and Keith Ranieri, right?

6 A That's what I wrote, yes.

7 Q What did you mean?

8 A What did I mean?

9 I'm sorry. I heard that question asked so many
10 times, I'm confused by the question.

11 Do you mean what -- could you rephrase the question?

12 Q Yes. When you told the district attorney that Barbara
13 Bouchey has flagrantly slandered Nancy Salzman and Keith
14 Ranieri, what did you mean?

15 A Could you ask it another way besides what do you mean?
16 I've been through so much education where that was asked every
17 day that I actually can't process the question anymore.

18 Q You don't understand my question, what do you mean?

19 I'll ask you a different question.

20 A If you don't mind.

21 Q What were you intending to convey to the district
22 attorney when you wrote that to the district attorney?

23 A That she had spoken poorly of them.

24 Q And, in your mind, speaking poorly of someone is
25 flagrantly slandering them?

1 A That -- I guess that was my belief then.

2 Q Was your belief based on facts?

3 A I actually don't not recall.

4 Q Wouldn't -- before you wrote a letter to the district
5 attorney, wouldn't you want to be absolutely clear about your
6 facts?

7 A In that system at the time, I believed everything I was
8 told and I acted accordingly.

9 Q So you made an official criminal complaint to start a
10 criminal extortion case against somebody, based on facts that
11 you didn't know whether they were true, whether they weren't
12 true; am I understanding you?

13 A I do not remember precisely whether I had the facts in
14 front of me, or whether I was told this is what she had done.

15 Q You go on to say that "A blogger named John Tighe living
16 in Saratoga Springs, has a server in Russia.

17 A That is what I was told, yes.

18 Q Did you check that out?

19 A I don't believe that I went on to a computer to check IP
20 addresses. I believe that's what I was shown.

21 Q Shown by who?

22 A It would have been shown by the legal team at that time.

23 Q And that's Kristin Keeffe?

24 A I don't recall if it was her at that time. I think it
25 was -- I think it was Clare Bronfman, Kristin Keeffe. I don't

1 recall if Nancy Salzman was part of it.

2 Q You go on to say to the district attorney that: John
3 Tighe, with the server in Russia, has been maliciously
4 committing character assassination against Salzman and
5 Ranieri.

6 That's what you're telling the district attorney in
7 your letter, right?

8 A I recall he was s writing a blog where he was saying all
9 kind of things.

10 Q And were the things that he was saying committing
11 character -- maliciously committing character assassination?

12 A I think I thought so at the time.

13 Q And because you thought so, you wrote this in a letter to
14 the district attorney, so that the district attorney would
15 take legal action, criminal legal action, against Barbara
16 Bouchey, right?

17 A Because I thought so, yes.

18 Q All right. You then go on to say that: John Tighe is
19 allowing death threats, death threats, to be posted on his
20 website? Right?

21 A I don't recall the death threats.

22 I -- but I wrote this, but I don't recall the
23 specific death threats.

24 Q You told the district attorney that John Tighe had death
25 threats on his website against Salzman and Ranieri, right?

1 A Yes, I think I may have been referring to comments that
2 he was allowing on the -- on the blog.

3 Q What were they?

4 A Sorry, I can't remember.

5 MR. LESKO: Objection.

6 Q How many times -- is this the only time you've ever
7 written letter to a district attorney's office or any
8 prosecutor's office, asking that someone be investigated or
9 arrested for a crime?

10 A Is this the...

11 THE COURT: I'm sorry. Can you answer that?

12 THE WITNESS: No, I didn't, sir.

13 THE COURT: You're thinking about it.

14 THE WITNESS: I'm thinking, yes.

15 A It's possible I may have written others while I was
16 inside the organization.

17 Q Was your residence being stalked by reporters?

18 A Yes.

19 Q How many reporters were stalking your residence?

20 A I believe -- as far as I recall, it was only one.

21 Q So when you told the district attorney that reporters,
22 plural, were stalking your residence, that wasn't exactly
23 accurate.

24 A Okay.

25 Q Do you agree with me?

1 A Well, there's context to this that's making this
2 difficult to respond to.

3 Q You didn't tell the district attorney when you were
4 asking the district attorney to launch a criminal
5 investigation against Barbara Bouchey that a reporter came to
6 your residence. That's not what you said, right?

7 A That's not what I wrote.

8 Q You go on to say very positive things about Raniere and
9 Salzman in this letter, correct?

10 A Yes.

11 Q By the way, were you living in Saratoga County when you
12 wrote this letter?

13 A I was living in 13 Twilight Drive.

14 Q And what county is that?

15 A I'm afraid I can't remember.

16 Q Did you think that you might be living in Saratoga County
17 when were you living at 13 Twilight?

18 Did you think that was possibly Saratoga County?

19 A I think so.

20 Q Because you told the district attorney that you were
21 living in Saratoga County.

22 A The borders and boundaries I don't remember that well
23 anymore.

24 Q You wrote this letter yourself?

25 A I don't know that I wrote it myself.

1 Q Did someone else write it for you and you signed your
2 name to it?

3 A My recollection is it was sort of a group, a group
4 drafting process.

5 Q And Kristin Keeffe was very involved in that process; am
6 I right?

7 A I think she was one of the people involved, yes.

8 Q Who else?

9 A I believe Lauren Salzman was involved. I believe Nancy
10 Salzman may have had been involved.

11 I'm blanking if there's others.

12 Q How well did you know Kristin Keeffe?

13 A I don't think I knew her that well. We sort of had a
14 what I'll call it an intellectual relationship. We spoke
15 about a lot of intellectual ideas, and then we spoke a lot
16 about the, you know, the enemies of Keith Raniere and, you
17 know, different stories that were out there, and how, you
18 know, they were not true.

19 Q You were -- until -- you said it was 2015, you were very
20 involved in the program and moving up the stripe path and
21 putting on improving on your rank; am I right?

22 A A little more complex than that. I think I had given up
23 on drawing up the stripe path a little bit.

24 I had concerns about a lot of the ways the company
25 was being run. But I was still very loyal. I was still very

1 loyal to Raniere.

2 Q Okay. I'm going to show you a photograph that's been
3 marked as Defendant's Exhibit 301.

4 MR. AGNIFILO: It's been provided to the government.

5 Q Do you recognize the people in that -- some of the people
6 in that photograph, as well as yourself?

7 A I do, yes.

8 Q All right. And you recognize yourself in that
9 photograph, right?

10 A I do.

11 MR. AGNIFILO: Your Honor, we offer it.

12 MS. PENZA: Your Honor, our monitor is not up.

13 MR. AGNIFILO: Oh, it's not on?

14 One second. We're just making sure the government
15 sees it.

16 THE COURT: You don't see it?

17 MR. LESKO: It's not on mine.

18 MR. AGNIFILO: Is it on yours?

19 It's on one of the defense monitors apparently.

20 MS. PENZA: It's on the jurors', it's okay. We
21 can --

22 MR. LESKO: We have no objection.

23 MR. AGNIFILO: We haven't put it into evidence, so
24 it' not on the --

25 MS. PENZA: Oh, I'm sorry.

1 THE COURT: Can you see it?

2 THE WITNESS: I can't see it.

3 THE COURT: I don't know why it's not on your
4 monitor. That's my question.

5 MR. AGNIFILO: Should I keep going?

6 THE COURT: Do you want to publish it?

7 MR. AGNIFILO: I do. I do.

8 THE COURT: Any objection?

9 MR. LESKO: No, Your Honor.

10 THE COURT: All right. Defendant's Exhibit 301 is
11 received in evidence.

12 Publish it to the jury.

13 (Defense Exhibit 301, was received in evidence.)

14 (Exhibit published.)

15 BY MR. AGNIFILO:

16 Q All right. So assuming --

17 MR. AGNIFILO: It's still not on? Okay. Because
18 I'm assuming it's on the jurors' monitors. Okay.

19 THE COURT: It's on the screen. Is it on the
20 jurors' monitors?

21 THE JURY: Yes.

22 THE COURT: Okay. Then we're good.

23 MR. AGNIFILO: Very good. Thank you.

24 BY MR. AGNIFILO:

25 Q All right. Who's here in this photo?

1 A Every single person?

2 Q So rather than using because when we use the green
3 thing --

4 THE COURT: I'm sorry. Can we get a date?

5 BY MR. AGNIFILO:

6 Q Yes, do you know about when this photo was taken?
7 Approximately?

8 A I'm going to guess 2010, 2011.

9 Q Okay. So who's in front? Who's with the green and white
10 shirt?

11 A On the bottom?

12 Q Yes.

13 A Michael Margolis.

14 Q Okay. And who is the woman with the black shirt to
15 Michael Margolis' right?

16 A To his right. Kristen Cook.

17 Q Okay. And who is right behind him with the red and white
18 shirt?

19 A Marissa Secolinski (phonetic).

20 Q Okay. And who is the woman with the white shirt there on
21 the second row? Above --

22 A Kristen Cook.

23 Q No, to Michael Margolis' left?

24 A Sorry. I can't remember her name.

25 Q Okay. And now going to -- going left to right, who's the

1 woman in the black, looks like a dress?

2 A Jenny Ose (phonetic).

3 Q And who's the women to Jenny Ose's left?

4 A In the white shirt?

5 Q Correct.

6 A Kendra Vatt (phonetic).

7 Q And who's on the left of Kendra?

8 A A gentleman is Tony Dean Smith.

9 Q Okay. And who's to the left of Tony with the scarf?

10 A I don't remember.

11 Q Okay. All right. Let's start on the other side.

12 Who's the woman standing with the white shirt and it
13 looks like an orange scarf?

14 A Blanking on her name.

15 Q Who's the man to her left with the black shirt?

16 A Blanking. Sorry.

17 Q Okay. Who's the woman to that man's left?

18 A Sarah.

19 Q Who is the man with the blue shirt?

20 A Bright blue shirt is Giles Panton.

21 Q Okay. And who is sort of standing just before Giles?

22 A That's Nancy Salzman.

23 Q Okay. And --

24 A I am -- I am -- that's me over there.

25 Q Okay. And who's to your left with the white shirt?

1 A Mark Hildreth.

2 Q Okay. And to who's Mark Hildreth's left? The woman with
3 the sort of dirty blonde hair?

4 A Blanking.

5 Q Okay. And who's the man holding, I think, that's a dog?

6 A Yes, Sean Craney (phonetic).

7 Q And are these folks from the Vancouver Center?

8 A Yes.

9 Q And Vancouver Center, you ended up being one of the
10 coheads of Vancouver Center; am I right?

11 A Correct.

12 Q All right. So that's the old one.

13 I'm going to show you another exhibit. 302.

14 MR. AGNIFILO: So this is just for identification
15 for the moment.

16 THE COURT: All right.

17 Q Do you see that pretty well?

18 A I don't see anything yet. I see it now.

19 I recognize that photo.

20 Q Okay.

21 MR. AGNIFILO: I offer 302, Judge.

22 MR. LESKO: No objection.

23 MR. AGNIFILO: No objection.

24 THE COURT: All right. 302 is received in evidence.

25 (Defense Exhibit 302, was received in evidence.)

1 (Exhibit published.)

2 BY MR. AGNIFILO:

3 Q Okay. Is Mr. Vicente, we're going to go -- we're going
4 to go left to right.

5 Who is the man on the far left, sort of in the
6 second row? You can only see his head and his torso?

7 A That's Mark Hildreth.

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9 (Continued on next page.)

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1 CROSS-EXAMINATION (Continued)

2 BY MR. AGNIFILO:

3 Q Who is the woman in front of Mark who is kind of leaning
4 over?

5 A In the bottom?

6 Q In the bottom part.

7 A One second please, Melissa.

8 Q Who is above Melissa, to the left of Mark?

9 A Kristen Kreuk.

10 Q Who is to Kristen's left?

11 A Jimena.

12 Q Who is to Jimena's left, in the blue?

13 A Sarah.

14 Q Next to Sarah?

15 A Myself.

16 Q In front of you, to your left, who is that?

17 A Carmen Garza.

18 Q And then all the way to the right, the gentleman with the
19 white sweater and scarf?

20 A Marcello Ortiz.

21 Q Who is above Marcello, to his right?

22 A Omar Boone.

23 Q Who is the woman with the blue and light blue, possibly
24 dress?

25 A Standby, Marianna Musey.

1 Q Who is the gentleman to Marianna's right?

2 A Enrique Martin Moreno.

3 Q Who is above that gentleman, slightly to his left?

4 A Alex Balenza.

5 Q The only one I think we left out is the gentleman to the
6 far right with the black suit, correct?

7 A Juan Salines.

8 Q Exhibit 303, just for the witness and the parties for a
9 moment.

10 Do you recognize what is in that photo, Mr. Vicente?

11 A I do.

12 MR. AGNIFILO: We offer it at this point, Judge.

13 MR. LESKO: No objection.

14 THE COURT: All right. Defense exhibit 303 is
15 received in evidence and published to the jury.

16 (Defense Exhibit 303, was received in evidence.)

17 BY MR. AGNIFILO:

18 Q So this is 303. That's yourself on the left?

19 A Correct.

20 Q Who is in front of you with their arm around your neck?

21 A Lauren Salzman.

22 Q Who is to Lauren's left?

23 A Val Ward.

24 Q Who is to Val's left?

25 A Adrianna Castilaso.

1 Q 304, do you recognize that?

2 A Same image -- same people, different moment.

3 Q Okay.

4 MR. AGNIFILO: We offer 304.

5 MR. LESKO: No objection.

6 THE COURT: Defense exhibit 304 is received in
7 evidence.

8 (Defense Exhibit 304, was received in evidence.)

9 BY MR. AGNIFILO:

10 Q So that's you and Lauren Salzman on the left?

11 A Correct.

12 Q Who are the other two people?

13 A Val Ward and Adrianna Castilaso.

14 MR. LESKO: Do we have approximate date?

15 Q Yes. Do you have an approximate date? Only if you know.

16 A I think 2009.

17 Q Do you recall, what, if anything, was going on at the
18 time this photo was taken?

19 A It's possible that it was a visit to Vancouver.

20 Potentially the time when I went out to do what I term damage
21 control. It may have been that same time, I'm not entirely
22 certain.

23 Q Damage control from the NXIVM 9 situation?

24 A The Tacoma center was closing down.

25 Q Remind the jury, you talked about that on the direct,

1 what was going on in the Tacoma center?

2 A With the nine women resigning, the Tacoma center was
3 shutting down, there was no one to operate it. The request
4 was made, could we go out, in essence, do damage control.

5 Myself and Lauren Salzman and I think Barbara Jeske,
6 I'm blanking who else went out there, to address to everybody
7 and talk to everybody and try to convince them that nothing
8 bad was going on. That was that trip.

9 Q You talked about going to Fiji. I'm going to show you
10 Defense exhibit 328 for identification.

11 A Yes.

12 MR. AGNIFILO: Your Honor, we offer 328.

13 MR. LESKO: Can I have a moment? Could we approach,
14 your Honor?

15 THE COURT: Yes.

16 (Continued on the next page.)

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1 MR. LESKO: Your Honor, with respect to Defense
2 exhibit 328, we object to specifically one of the photos. We
3 object to the photos of women in bathing suits.

4 MR. AGNIFILO: That's fine.

5 THE COURT: Where is this supposed to be?

6 MR. AGNIFILO: Fiji.

7 MS. PENZA: There are a million pictures of Fiji.

8 MR. AGNIFILO: That's fine.

9 MR. LESKO: We haven't objected, but we're -- I'm
10 struggling to understand the relevance of all of these
11 photographs.

12 THE COURT: Can you help us with the struggle?

13 MR. AGNIFILO: With the struggle?

14 THE COURT: He's struggling. I want you to be open.

15 MR. AGNIFILO: He was saying XOSO is abusive. I
16 don't see abuse. I see people doing yoga in a beautiful
17 place. I see people smiling and in bathing suits. I think
18 the smiling overwhelms the bathing suits. There is nothing
19 wrong with bathing suits. I don't see abuse. I don't see a
20 harm, mean-spirited program. I see a bunch of people in Fiji
21 enjoying themselves. I don't think that's how he described
22 it.

23 MS. PENZA: A lot of this was a publicity type
24 event. And so the idea that -- we have no problem with --
25 there is no -- the Government is not contending that there

1 were not people who developed friendships within NXIVM. And
2 at various points in time there were pictures where they
3 appear to be having a good time and enjoying their company,
4 that's not up for dispute. Here the probative value I think
5 it totally overwhelms of the women in their bikinis, when this
6 is a case of the importance of collateral.

7 It is obviously a different situation to have a
8 picture of women in bathing suits, but given the circumstances
9 and I just don't think it's appropriate. But I think that
10 it's becoming redundant. We just want to make sure that we're
11 not -- that it's not -- that's it is not cumulative.

12 We want to make sure there is an end to this. Dates
13 in the far past, a lot of the people are in the photos. It
14 becomes too much at some point.

15 THE COURT: Before it becomes too much, just stop.

16 MR. AGNIFILO: Okay.

17 I do want to bring -- the picture -- there is
18 nothing wrong with bathing suits.

19 MS. PENZA: Get another picture from Fiji. I've
20 seen of millions.

21 MR. AGNIFILO: Not of people smiling.

22 MS. PENZA: It's inappropriate. I assure you, your
23 Honor, there are many pictures.

24 MR. AGNIFILO: These are the ones that he sent. The
25 reason these are being put in is because he e-mailed them to,

SIDEBAR CONFERENCE

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1 I think it was Clare, so we have them. We have these. We
2 don't have others. If there are others, we don't have those.
3 We have these.

4 And this is it. After this, no more Fiji photos, no
5 more photos at all.

6 THE COURT: You want to put it in or not?

7 MR. AGNIFILO: I do. I offered it.

8 THE COURT: Go ahead, put it in.

9 (End of sidebar conference.)

10 (Continued on the next page.)

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1 (In open court.)

2 THE COURT: For the lawyers, I understand that in
3 order to restore the video on counsel's table we're going to
4 have to reboot, so we'll do that at the end of the day and
5 just keep going right now.

6 You're offering 328? All right. 328 is received in
7 evidence.

8 (Defense Exhibit 328, was received in evidence.)

9 BY MR. AGNIFILO:

10 Q Mr. Vicente, you're looking at Government's Exhibit 328.
11 These pictures were sent by yourself to Clare Bronfman, Alex
12 Betancourt and to Keith Raniere in this other e-mail that you
13 have, correct?

14 A Yes.

15 Q What is depicted in this top photo?

16 A This I believe was during the very first XOSO VIP
17 intensive that was held I think for six people. That first
18 photograph is a photograph I took of the participants doing in
19 essence yoga on the deck by the pool.

20 Q XOSO you said that has a physical fitness angle to it,
21 right?

22 A Yes.

23 Q Tell us what the program was exactly?

24 A Well, my understanding was that the first level, there
25 were different platforms, levels. My understanding of the

1 platforms here was like a party, put them in parties.

2 Platform one was, some of this which was just more physical
3 stuff, developing strength and flexibility.

4 I don't know a lot about the other platforms, some
5 of them hadn't been developed yet. There was one platform
6 that then became reverence, the emotional gym, working out,
7 working on your emotions, being able to raise them, lower
8 them, that kind of thing.

9 Q You were flown to Fiji at no cost to yourself so you can
10 take these photos for the XOSO VIP event, correct?

11 A I was asked to take photos and videos.

12 Q How did you get to Fiji. Fly? Commercially?

13 THE COURT: You mean did he take a plane or a boat?

14 Q Did you fly commercially or fly some other way?

15 A I believe some of it was commercial and some of it was
16 charter.

17 Q And did you go along with other people?

18 A I went along with the participants and the trainers. And
19 I think this occasion I think I was on my own with the
20 cameras.

21 Q So now the bottom photo is what? Some of the
22 accommodations in Fiji where you all stayed?

23 A That was I believe the master suite in the main house.

24 Q So this is one suite in the main house, this particular
25 photo?

1 A Yes.

2 Q We'll look at the next group of pictures. Were these
3 pictures that you took yourself?

4 A Yes.

5 Q So here, what is being depicted what the bottom of the
6 photographs?

7 A That is a view of the main house and the pool and the
8 deck, with the ocean in the distance. I think I'm standing on
9 a roof of the master bedroom.

10 Q The photo above it is just sort of a --

11 A The gardens leading up to the main house.

12 THE COURT: Were you at a resort?

13 THE WITNESS: This was a house that was owned by
14 Clare Bronfman, Alex Betancourt and Ranieri. And multiple
15 properties were purchased. This was owned by a businessman at
16 one point and they purchased it.

17 THE COURT: So was this owned by NXIVM?

18 THE WITNESS: My understanding is it was owned by a
19 company, ACT.

20 THE COURT: Which was?

21 THE WITNESS: ACT was Alex Clare Keith. I don't
22 know what its relationship was to NXIVM.

23 THE COURT: I see go ahead.

24 BY MR. AGNIFILO:

25 Q The photo of the people in the water, these are some of

1 the people who attended from XOSO?

2 A These are some of the people that attended and some of
3 the trainers.

4 THE COURT: Did you take this picture?

5 THE WITNESS: I did take this picture, yes.

6 Q Did you enjoy yourself in Fiji?

7 A Not particularly, I was shooting all the time.

8 THE COURT: How long did it take you to get to Fiji
9 in hours?

10 THE WITNESS: I think maybe 18, maybe more. It's
11 like going to Australia, but there is more flights involved.

12 Q These are more of the accommodations in Fiji?

13 A That was part of the, they eventually purchased the hotel
14 on the island. And so this was one of the beaches that I
15 believe belonged to the hotel.

16 Q The last picture, more of the accommodations of Fiji?

17 A That's the main house. That's the sitting area in the
18 main house, underneath the main section.

19 Q After you went to Fiji this time, which I believe is 2014
20 do I have that right? Let me show you the cover e-mail.

21 A It looks like I sent them from there, I think, yes.

22 Q You believe you sent these from Fiji?

23 A I think so. Based on some more from today indicates that
24 I took them that day, that I did processing on them, and then
25 e-mailed them.

1 Q Did you go to Fiji again after you went there in May of
2 2014?

3 A Yes. I went to shoot another training.

4 Q So you didn't have such a bad time that you never went
5 again.

6 A Well, I was in essence -- I'm not sure how to answer
7 that.

8 Q When you went to Fiji again were you forced? Were you
9 compelled? Were you coerced? Did you go against your will
10 tell? The jury that.

11 A No, I didn't go against my will. I went to shoot
12 photographs, again, shoot videos. I was trying to shoot
13 additional material for what would be turn into a trailer for
14 the property on the island.

15 Q This next time, after you had such a bad time the first
16 time, they paid for your trip then too?

17 A I don't know that I said that I had a bad time the first
18 time.

19 Q You said you were working.

20 A Yes.

21 Q I asked if you enjoyed it, you said you were working.

22 A Yes.

23 Q The next time you went, they paid for your time again
24 too?

25 A They paid for the flights as far as I remember. I don't

1 know that I was paid for the actual work; I was just paid for
2 the flights.

3 Q You paid for the hotel?

4 A No, it was all the resort, they already owned.

5 Q So how much out-of-pocket were you to get on a plane, fly
6 to Fiji, stay in Fiji eight, ten days, fly back? How much
7 out-of-pocket did you suffer?

8 A I don't understand.

9 Q Did you spend a dime?

10 A No. I think I just spent money on food in other places.

11 MR. AGNIFILO: Your Honor, we're going to go to
12 another area in about two minutes, we can do it now or?

13 THE COURT: Go ahead.

14 MR. AGNIFILO: Keep going?

15 THE COURT: Yes, please.

16 MR. AGNIFILO: We played part of an audiotape.
17 We're going to play some other parts, unless we can go for
18 another half hour, I want to play these audiotapes and ask
19 some questions.

20 THE COURT: All right, then we'll take a break.
21 We'll take our afternoon break for ten minutes.

22 All rise for the jury.

23 (Jury exits the courtroom.)

24 THE COURT: The witness may stand down. Don't
25 discuss your testimony with anybody.

1 (Whereupon, the witness steps down.)

2 (Brief recess.)

3 THE COURT: Bring in the witness.

4 (Whereupon, the witness resumes the stand.)

5 THE COURT: Bring in the jury.

6 (Jury enters the courtroom.)

7 THE COURT: Please be seated.

8 The defense may continue its cross-examination.

9 The witness is reminded he's still under oath.

10 THE WITNESS: Yes, your Honor.

11 THE COURT: Let's proceed.

12 BY MR. AGNIFILO:

13 Q We're going to pay snippets of Government's Exhibit 1002
14 already in evidence. We're going to start with three minutes
15 and 29 seconds.

16 (Audio played.)

17 Could you stop it for a second? That's Damon Brink.

18 A That's correct.

19 Q And Damon Brink is one of the members of Associate Of
20 Protectors, SOP?

21 A He was a member of the higher counsel up to a certain
22 point, I think he still is a member today.

23 Q And so you said this on direct examination, the gentlemen
24 that are present for this, there is yourself, there is Keith,
25 there is Jim Del Negro, there is Mike Baker and Damon Brink?

1 A That's correct.

2 Q That voice talking about hiking, that was Damon Brink?

3 A That's correct.

4 Q We can keep going.

5 (Audio played.)

6 THE JURY: We can't hear anything.

7 THE COURT: Okay, hold on. Let's try it again.

8 MR. AGNIFILO: I think we should start at the
9 beginning I don't know that the jurors got everything.

10 (Audio played.)

11 Q That was Jim Del Negro?

12 A Correct.

13 Q Go ahead.

14 (Audio played.)

15 Mr. Vicente, could you hear that okay?

16 A Yes.

17 Q So this is one of the early meetings of the Society Of
18 Protectors, right?

19 A I believe so. I think this might have been after the
20 first weekend.

21 Q And so here we are in October 29, 2012, which is when
22 this meeting took place. What is the purpose of this meeting?
23 What, if anything, are you all trying to do?

24 A Well, Raniere was saying he wanted to spend time with us,
25 to have bonding sessions. And to figure out the specifics of

1 what we would do, because it wasn't very clear at this point.
2 He seemed to have more of a road map. We weren't quite sure
3 where this was going. And there were discussions, I think to
4 help us figure out how to lead.

5 Q And so one of the things that was talked about in the
6 passage we heard a lot was commitment, right?

7 A Yes.

8 Q And is this the first time you ever heard Ranieri say
9 that commitment is virtue, commitment helps you build
10 character, had he said things like that before?

11 A I don't recall. I mean the first time I heard him say,
12 commitment is power. As far as the other connection of
13 concepts, I don't recall.

14 Q He says commitment is power. He says it's personal
15 power, right? You heard him, that it's power, it's personal
16 power. Lack of commitment is what destroys our potency and
17 destroys everything. You heard him say that?

18 A I believe so.

19 Q And he said commitment to an action, commitment to an
20 ideology, commitment a course, the stronger your commitment
21 the more powerful you are?

22 MR. LESKO: Objection.

23 THE COURT: Sustained.

24 Q Let me, what did you understand him to be saying?

25 A My general understanding is basically unquestioning

1 commitment is the most important thing.

2 Q For what?

3 A To be become this noble ideal.

4 Q And toward the end of that section what did you
5 understand him to be saying when he said, I want absolute say
6 but any of you can question me?

7 A We can talk about it, but in the end I'm the decision
8 maker.

9 Q And one of the things that he also went on to say, tell
10 me what you think of this is, people can question the group
11 from the outside, if you weren't in SOP. You could question
12 SOP, but he didn't want people from the outside questioning
13 individual members of SOP. Is that what you understood?

14 A I was honestly a little confused about that part.

15 Q Next section at 18:30. We went from 3:29 now to 18:30
16 and go through 20:37.

17 (Audio played.)

18 Now, you said earlier that you were all trying to
19 figure out was what SOP was going to be. Then Raniere was
20 sort of providing more of the ideas and sort of a road map; is
21 that a fair way to put it?

22 A I think he had a better idea than we did. I think we
23 liked the basic concept, but in essence he was instructing us
24 as to what we would do.

25 Q What was the basic concept, as you understood it?

1 A That in order to be powerful you have to commit. And
2 that has to be a clear commitment, commitment is power. That
3 we would, we should become this force in the world by virtue
4 of collecting other people who were capable of committing as
5 well. And then eventually we would be able to influence
6 elections, countries, be a real massive force.

7 Q A force for good?

8 A That was what I understood then, yes.

9 Q That was the idea behind SOP as you understood it, am I
10 right? A gathering together of men, in the beginning, to be a
11 force for good, correct?

12 A That's what I was told, yes.

13 Q And the commitment that he was asking, was on behalf of
14 any of the men who wanted to join SOP, to join it for a
15 certain amount of time, right? Is that what you understood
16 it?

17 A That was the discussion we were having, yes.

18 Q Because it was pointed out you can't demand a life
19 commitment, so maybe a year, right?

20 A Yes. Later the life commitment came up, but at this
21 point we are just discussing.

22 Q Let's go forward to 26:58.

23 (Audio played.)

24 Can I stop it right there for a second?

25 When you said it can't be financial, it's got to be

1 a bond of some kind, what did you mean?

2 A There were a lot of very wealthy people in the
3 organization, that money was no big deal. I thought of
4 something more of a bond between people. Certainly I wasn't
5 suggesting where things went. I was suggesting something
6 more, I have a bond with certain people in my life based on
7 they will always be there for me, that kind of thing. I
8 hadn't mapped it out in terms of, you have to do this, and I
9 have to do that. It was more of a kind of bond I have with
10 people I really care about and care about me.

11 Q Let's keep going. Thank you.

12 (Audio played.)

13 This is part of what we heard this morning as well,
14 right?

15 A I believe so, yes.

16 Q And so is your understanding here, if you're not going to
17 violate your own word, then the collateral doesn't matter. Is
18 that your understanding of what he's saying here?

19 A I believe that's what he's saying.

20 Q That was my question. What he's saying is the collateral
21 is irrelevant if you intend to keep your word and the
22 collateral is attached to your word, the collateral doesn't
23 matter because you're going to keep your word. That's what
24 he's saying here?

25 MR. LESKO: Objection.

1 THE COURT: Sustained.

2 Q What is your understanding what he's saying?

3 A I have numerous understandings. There is the face value
4 of it. Then there is the attempt to have us see a massive
5 amount of collateral as, in least someways irrelevant, and
6 utilizing our own desire for commitment to suggest that really
7 if you have this enormous desire for commitment then why worry
8 about any amount of collateral. So it almost minimizes what
9 could be staggering collateral.

10 Q Did you put up staggering collateral?

11 A I wouldn't call it staggering.

12 Q Did Mr. Raniere ever threaten you in regard to your
13 collateral?

14 A I don't believe he threatened me.

15 Q Did Mr. Raniere ever say, if you don't do something I'm
16 going to release your collateral to someone?

17 A I wasn't worried about myself.

18 Q What is the answer to that question?

19 A Could you ask the question again?

20 Q Did he ever say to you, if you don't do something that I
21 want to you do I'll release your collateral?

22 A I don't believe he said that to me.

23 Q We're not going to play the rest, we played the rest this
24 morning.

25 Fair to say that the concepts of commitment and

1 collateral and some of the things that Mr. Ranieri and you all
2 were discussing in these meetings are themes that would come
3 up again and again in SOP?

4 A Yes.

5 Q So this wasn't the last time in SOP Mr. Ranieri discussed
6 collateral and commitments and things like that, he would
7 discuss it over and over?

8 A Yes.

9 Q And you would discuss it as well, correct?

10 A Yes.

11 Q Did you disagree with anything that he said about the
12 importance of commitment?

13 A No, I did not disagree.

14 Q I want to talk to you about other aspects of SOP. You
15 talked a great deal on direct examination about SOP. Do you
16 remember the study you all did with the M&M's?

17 A Yes.

18 Q What do you remember about the study with the M&M's?

19 A It was a method he came up with to try to get the women
20 to understand what it was like being a man.

21 Q And tell me if this is right. A number of women were
22 together and you introduced this particular program, do you
23 remember that?

24 A Yes. He basically said, go and do the following. I
25 wasn't sure where I was going. He kept it from us. He wanted

1 it to be a surprise.

2 Q Tell the jury what the program was, what did you say,
3 what were people told to do?

4 A Basically he said to me, go to the women, give them
5 bunches of M&M's and their job is to try to get the men in the
6 room to take as much of them as they can. And then let the
7 women know that if they have any left over they will, I think
8 it was something like, they will do maybe two minutes of
9 planking, the top of the push-up, per M&M that they have left
10 over, so there will be consequences for not being able to give
11 these away.

12 So I went up and I did the instructions. And then
13 it was sort of a game that began, where they were trying to
14 get the men to take the M&M's. I think shortly after lunch,
15 so the guys weren't really hungry.

16 Q Were you filming this or was someone else?

17 A I believe someone else was filming this.

18 Q The men weren't told that if the women gave M&M's that
19 the women would do these one-minute planks?

20 A They were not told that.

21 Q People were crying, as they described their experiences
22 in this M&M program, right? Do you remember that?

23 A Yes, I think both men and women were crying about it.

24 Q Everyone was very emotional because they didn't
25 understand what the other -- the men didn't understand what

1 the women were going through and vice versa; is that fair to
2 say?

3 A Yes.

4 Q Do you remember how long ago it was that you did the M&M
5 program? Fair to say many years?

6 A It's been a while, I don't remember.

7 (Continued on next page.)

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1 CROSS-EXAMINATION (Continued)

2 BY MR. AGNIFILO:

3 Q And you still remember it today, right?

4 A It took a while to recollect, but I remember.

5 Q But people were emotional at a lot of these programs. It
6 wasn't just the M&M program, right?

7 A Yeah, I mean, it's the nature of the human potential,
8 there's a lot of emotion.

9 Q Now, you were talking yesterday about this SOP event that
10 Mr. Raniere canceled because there weren't enough men who had
11 signed up for the event.

12 Do you remember talking about that a couple days --

13 A Yeah, I thought the way it was done was not ethical.

14 Q Okay. And tell the jury what you remember about that.

15 A We were supposed to have a hundred men, I think, with
16 short maybe one or two. Some of the guys went to connect with
17 just other men that weren't intending to take the training,
18 and I think from another training that was going on. And then
19 I think it ended up with a hundred two or hundred three men.

20 And then we began the training. He got a phone call
21 to say, look, I think this is not done well. You know, it was
22 an upset from, I think was Lauren Salzman.

23 And then he came to us and said, look, I think the
24 way this has been done is not good. So I can't continue. I'm
25 going to leave. You guys you can do whatever you want.

1 I think he -- I think he was the one that -- that I
2 suggest to you you refund their money.

3 Q Now, do you recall that the problem was that -- you had
4 to have a hundred men who signed up for this course by a
5 certain point in time, and that you didn't have the hundred
6 men who signed up by a certain point in time, so other people
7 were borrowed to get to a hundred.

8 Do you remember that?

9 A That's my understanding. I wasn't part of the borrowing,
10 but there was -- I don't recall if the deadline was at when
11 the training started or before. I don't recall that.

12 Q And because the hundred men hadn't all signed up for the
13 course, he didn't want to go forward with the course, because
14 the understanding was everybody who was in the course had to
15 be signed up by a certain point and that wasn't done, right?

16 A Well, my recollection is that we did have a hundred men,
17 over a hundred men in the training, but it was that he got
18 information later that he felt it wasn't done in a proper
19 manner. And so because of that, he felt that he needed to
20 leave.

21 Q And this was videotaped, right?

22 A I'm certain it was. Yeah, it was.

23 Q Do you remember Keith directly addressing all of the men
24 himself and saying I'm going to refund your money because we
25 didn't do this the way we had promised to do it?

1 Do you remember that?

2 A It's possible. I don't recall exactly. It is possible
3 though.

4 Q Were you there?

5 A In the training room? I was there in the training room
6 but I don't remember -- there were many, many trainings.

7 Q Do you remember him standing up in front of the whole
8 group of men and saying I'm -- I am going to refund your
9 money. I am responsible for this.

10 Do you remember him saying that?

11 A I mean, if you have material to show me, I can probably
12 say yes, but I don't recall exactly in this moment that that's
13 exactly what happened.

14 Q We can do that. We'll come back to that, all right?

15 A Okay.

16 Q And now you said you weren't filming it, but someone else
17 was?

18 A I don't think I was, because, generally, when I was
19 helping running trainings, there were other people that were
20 shooting.

21 Q All right. We're going to come back to this.

22 I want to talk a little bit about the video
23 glitches. Remember you talked on direct examination about
24 video glitches?

25 A Uh-huh.

1 Q Glitches of videotapes.

2 A Uh-huh.

3 Q Okay. And tell me if this is right. You can't tell from
4 watching the glitch itself whether the glitch was put there
5 intentionally or inadvertently. Just looking at the glitch
6 itself.

7 A No, I believe I can tell that.

8 Q And how can you tell?

9 A Because of the nature of the kinds of glitches that occur
10 in -- in analog video.

11 And I think I made the distinction between, you
12 know, something that was cut at the time versus later.
13 Generally speaking, the cameras that we used and the tripods
14 were pretty, you know, the tripods were pretty shaky.

15 So you could kind of see when somebody pressed a
16 button and released, there was a shake afterwards, so I recall
17 making that distinction.

18 There were also a series of glitches that just, you
19 know, seemed very random. And I do recall creating random
20 things to sort of, you know, hide the pattern.

21 Q Now, you testified that Keith Raniere told you that he
22 needed to you make glitches in video recordings, right?
23 That's what you told the jury.

24 A I think I said that he asked me how it could be done.

25 Q And did he specifically tell you that -- I think you told

1 the jury that he said that these videos were going to be
2 produced in discovery in a lawsuit.

3 A That the -- the patent was under risk and that these
4 videos needed to be addressed in some way, because they were,
5 I think, needed to be handed over and they needed to be, you
6 know, corrected in some way. I don't remember the exact
7 language.

8 Q And do you recall him specifically telling you that these
9 videos were being turned over in discovery in a lawsuit?

10 A I don't recall him saying that specifically.

11 Q All right. So you have no specific recollection of Keith
12 Ranieri saying to you that these videos were being turned over
13 in connection with a lawsuit; am I right?

14 A That's true, because I only realized about the actual
15 lawsuit later.

16 Q Isn't it true that the person who told you that was
17 Kristin Keeffe?

18 A Later she shared with me that it was in relation to the
19 Stephanie Franco case.

20 Q So you heard that information from Kristin Keeffe, not
21 from Keith Ranieri.

22 A No, and that was 2017. I was just surprised.

23 Q Right. So it's not the case that Keith Ranieri told you
24 that these videotapes were being turned over in the Stephanie
25 Franco lawsuit?

1 A No, I don't believe I said that, no.

2 Q Okay. The one that told that you was Kristin Keeffe?

3 A The information about what it was it being actually used
4 for, yes.

5 Q Now, you testified that this happened in June of 2008,
6 right, that this is when this --

7 A Sorry. Did you say -- what year?

8 Q 2008. June of 2008.

9 A Oh, yes. I believe so.

10 Q Now, you were interviewed by the FBI on numerous
11 occasions prior to testifying here today, correct?

12 A Correct.

13 Q And the first time that you were interviewed by the FBI,
14 you called the FBI on May the 26th, 2017, right?

15 A I don't recall the exact date. It was towards the end of
16 May.

17 Q This is just to refresh your recollection.

18 MR. AGNIFILO: If we could just have it so that --

19 MS. PENZA: Could we have the number?

20 MR. AGNIFILO: I'm sorry. It's 3500-MV-1.
21 3500-MV-1.

22 Q And my only question is take a look at this, and just
23 kind of tell me if it refreshes your recollection as to the
24 date.

25 (Whereupon, the witness is reviewing the document.)

1 A That -- that seems consistent with the time I called.

2 Q Okay. May 26th, 2017.

3 A I cannot recall from my memory. I just have to go with
4 documentation at this point.

5 Q Okay. All right.

6 And do you recall if you contacted the FBI again on
7 May the 31st?

8 A I don't recall specifically. I know I did make multiple
9 attempts.

10 Q Okay. And you didn't tell the FBI about these video
11 glitches in either of those phone interviews; fair to say?

12 A No, I think that was sometime later.

13 Q You recall being interviewed by the FBI for a third time
14 on November 10th, 2017?

15 A I don't know the exact date. But I was interviewed a
16 number of times.

17 Q Let me show you something to refresh your recollection.

18 MR. AGNIFILO: This is 3500-MV-2.

19 Just look zero on the bottom left.

20 (Whereupon, the witness is reviewing the document.)

21 A Okay. Again, I think that was the time period.

22 Q And you didn't mention anything about the glitches in
23 this third interview with the FBI, right?

24 A You might know better than I, because I just have the
25 report.

1 Q Do you remember if you first told the FBI about this on
2 December 5th, 2017?

3 A I don't recall.

4 Q And do you recall if you told the FBI that you were
5 making the glitches in 2009 and 2010?

6 A I don't recall.

7 Q I want to show you, it's the fourth page of 3500-MV-5.
8 And it's in sort of the bottom.

9 A Yes, I see the date there.

10 Q And do you remember you told the FBI that it was 2009 or
11 2010 that Ranieri discussed this with you?

12 A I don't recall saying it specifically, but it is in that
13 report.

14 I don't recall the exact date that I told them.

15 Q And there were a number of film projects -- there were a
16 number of different projects that the -- that your crew was
17 working on at different points in time; fair to say?

18 A In the community you mean?

19 Q Yes.

20 A Yes.

21 Q There were a number of different video projects at
22 different times; fair to say?

23 A Yeah, but it was generally one at a time. There wasn't
24 really enough skilled crew to do too many projects.

25 Q Now, I think you testified on direct examination that in

1 terms of the project related to these videos, some things
2 happened at your house at Twilight and some things happened at
3 Apropos.

4 Do you remember testifying to that on direct
5 examination?

6 A That's my recollection, yes.

7 Q Do you remember telling the FBI on December 5th that you
8 never mentioned anything happening at 13 Twilight?

9 When you were talking about this project, you were
10 talking about what you were doing in regard to these videos,
11 you never mentioned to FBI on December 5th that you were doing
12 this in your house?

13 A That is entirely possible I didn't mention that, yes.

14 Q And did you not mention that to the FBI because you
15 didn't want the FBI thinking that you were doing something
16 wrong with videotapes in your house?

17 A No, I think it's just 12 years of material in my brain.
18 It's not organized very well.

19 Q So what you're saying is that although you did some of
20 this video project in your house, when it came time to
21 actually tell the FBI about the video project, you said you
22 did it at Apropos, right?

23 A And then I discovered, you know, my own emails that
24 showed, you know, it was there as well. At which point I
25 don't remember --

1 Q Right. What you are saying is -- I'm sorry. I
2 apologize.

3 A At which point I handed it over once that pieced more of
4 it together.

5 Q All right. But when were you talking to the FBI in
6 December, on December 5th of 2017, you said that all of
7 these -- all projects was done in the restaurant Apropos. You
8 didn't say any was done in your house.

9 A I may have said that. You know, I don't have perfect
10 recall.

11 Q What was in the basement of your house?

12 A The basement was a storage area. It was sort of personal
13 storage and then there was another section that was storage
14 area for video equipment.

15 It was some things kept under the stairs. A lot of
16 cables, a lot of tripods, lights; that kind of thing.

17 Q So you're telling us that you mistakenly said that this
18 all happened at Apropos, because you had forgotten that you
19 had actually done it at your house, right? That's what you're
20 telling us?

21 A Well, I was traveling a great deal, so I wasn't there all
22 the time. It wasn't like I was there every single day to have
23 the kind of recall that would be more helpful.

24 I do recall certain things. Like I recall the boxes
25 of VHS machines being stored under the stairs. I don't recall

1 a lot about what happened in Twilight. I recognize some of
2 the emails and I realize I guess some of it did.

3 I remembered going to Apropos and seeing part of the
4 process happening there.

5 Q And what exactly happened at Apropos?

6 A My recollection is some of the duplication happened at
7 Apropos. I think that some of the analysis of what needed to
8 be removed may have happened there.

9 Q And you're saying Fluffy was at Apropos helping you do
10 this?

11 A I think he was one of the people involved. There were a
12 number of people.

13 Q Involved in Apropos, that he was in Apropos. He wasn't
14 in 13 Twilight doing this. He was in Apropos doing this.

15 A I think both.

16 Q Now, what's Edit One and Edit Two?

17 A Those are referred to two -- at that point Mac Towers,
18 Power Computers. And there were like editing desks and
19 monitors.

20 Q Were where they?

21 A Those were in Twilight.

22 Q Were they ever in Apropos?

23 A Those were not, no, because they're editing machines,
24 different purpose all together.

25 Q Right, but part of what you're saying is that the editing

1 machines are different meaning they would not be used for this
2 particular project?

3 A Duplications are different, a different thing than
4 editing.

5 Q So the editing machines, Edit One and Edit Two, would not
6 be related to the project we're talking about with the
7 videotapes -- I'm sorry -- that the videotapes being given
8 over discovery that would be something else?

9 A No, I believe they were. I think they were used for
10 certain processes like insert editing, stack it, and that kind
11 of thing, which couldn't just be done with dubbing.

12 Q So there's two parts to this, right? There's the editing
13 part and then there is the dubbing part or the copying part,
14 right?

15 A There's the -- there were a number of methods that I had
16 suggested. In the actual extraction of the material, the
17 hiding of the cuts, some of it was done through editing in a
18 computer. Some of it was done through literally the
19 manipulation of cables and some of it was done machine to
20 machine.

21 The actual duplication to age them was a different
22 process that was not necessarily done in Twilight.

23 Q And you're saying it was done at Apropos. It wasn't done
24 at Twilight because it was done at --

25 A I think that the multiple duplications, I think, was done

1 at Twilight. Sorry, at Apropos.

2 Q Now, let's look at -- I want to look at GX1396, which is
3 already in evidence.

4 (Exhibit published.)

5 Q Do you see this document, GX296 in evidence?

6 A Yes.

7 Q It's from Chris, correct?

8 A Yes.

9 Q It's to Nancy Salzman, right?

10 A Yes.

11 Q Copies Clare Bronfman, yourself, and Kristin Keefe,
12 right?

13 A Yes.

14 Q Now, and what it says: Hello, all. I'm writing just to
15 complete the circle of communication. Here's my understanding
16 of the requests for tapes of the 16-day intensive that Kristen
17 would like for legal, correct?

18 A Uh-huh, yes.

19 Q So the person here who's making the request is Kristen,
20 in the legal department, right?

21 A Yes.

22 Q And it says: We need it by Wednesday, June 25th, 2008.

23 That's what it says, correct?

24 A Correct.

25 Q And then it says: At this point, we don't know how long

1 it will take. So as per Kristen's request, we are taking both
2 Edit One and Edit Two stations at 13 Twilight from 8:00 a.m.
3 until 12:00 a.m., Sunday through Wednesday, correct?

4 A Correct.

5 Q Now, you have a specific recollection that this is in
6 relation to this project in regard to the tapes to be provided
7 in discovery?

8 A I believe so. I don't recall another legal project.

9 Q But you're not sure.

10 A Well, as far as I know, there's no other legal project
11 that was -- that these machines were involved in.

12 Q Are there any other projects, video projects of any type,
13 at this point in time?

14 A At that point, there is likely some material from NXIVM
15 film that started to come in. That may have been -- was
16 possibly being looked at and logged in the machines, but this
17 would have taken precedence.

18 Q Do you recall that you were working on these two projects
19 at virtually the same time?

20 A Well, I was working on the Mexican project and so I was
21 shooting material and sending it back to Albany. At that
22 point there was no rush, so, you know, what would happen is if
23 something came in that was more important, we would just stop
24 because it wasn't -- there wasn't a deadline at that point for
25 the Mexican project.

1 Q Now, do you recall at this point in time that you and
2 others in the video unit were taking video in other forms and
3 basically making it so that it would be easily -- more easy to
4 store and access?

5 Do you remember that being an ongoing project?

6 A I believe that was later.

7 We bought -- well, Clare Bronfman bought a large
8 what's called a RAID system. I think that was a number of
9 years later, to basically gather all of Keith Raniere's
10 material in one place.

11 Q I'm going to show you what has been marked for
12 identification as Defendant's Exhibit 340. You might have
13 discussed this in your direct examination, but it wasn't put
14 into evidence.

15 For the time being, I'm just going to ask you a
16 couple of questions about it, but I don't want you to read it
17 out loud just yet.

18 This is an email from yourself to Ken Kozak, Adrian,
19 who also goes by the name of Fluffy and Chris, correct?

20 A Sorry. Do that one more time.

21 Q Sure. This is an email from you --

22 A Yes.

23 Q -- to Ken Kozak, Adrian and Chris, correct?

24 A Yes.

25 MR. AGNIFILO: Your Honor, we admit as 340.

1 THE COURT: So admitted.

2 MR. AGNIFILO: And just to be clear, it's dated
3 July 12th, 2008.

4 MR. LESKO: No objection.

5 THE COURT: All right. That's Exhibit 340 received
6 in evidence.

7 Publish to the jury.

8 (Defense Exhibit 340, was received in evidence.)

9 (Exhibit published.)

10 BY MR. AGNIFILO:

11 Q So here you write: Ken and Fluff, I'd like to get a
12 timeline for getting projects completed. Right?

13 A Yes.

14 Q What projects, in the plural, are you talking about
15 there?

16 A The projects -- the tape dubbing for legal and then
17 organizing the basement.

18 Q And what do you mean by organizing the basement?

19 A It was a mess and I wanted it organized in such a fashion
20 you could find things.

21 Q All right. So this is not the Mexican film project you
22 just talked about a few minutes ago. The organizing basement
23 project is yet --

24 A In other words, physical labor I called projects or
25 missions or whatever as well.

1 Q Right. Okay. So what was the organizing the basement
2 project exactly?

3 A Well, I had a number of fairly young people with very
4 little experience working for me. When they would shoot
5 things, they would often just put things anywhere, and not put
6 them away.

7 And so my desire was for them to come up with some
8 kind of system; you know, you put cables here, you put cameras
9 here, you put lights here. It's basically an organization.

10 Q Okay. So in or around June and July of 2008, there's
11 three projects going on. There's the legal project that
12 Kristen wants you guys to do. There's the Mexican film
13 project. And there's the cleaning up the basement project; am
14 I right?

15 A Yes, and I believe the NXIVM film project is actually
16 being done in Mexico at that point.

17 Q All right. So you don't think you were talking about the
18 Mexican film project here in this email from July 12th, 2008?

19 A I don't believe so.

20 Q You think you're talking about the cleaning up the
21 basement project?

22 A As the second project, yes.

23 Q Okay. And so what you say here is to Ken and Fluff: Can
24 you tell me when the tape dubbing for the legal project is
25 scheduled to be done? What did you guys discuss with Chris?

1 A Uh-huh.

2 Q All right. So the legal project, is that the Kristin
3 Keeffe project?

4 A My understanding it's the removing of the materials in
5 the 16-day.

6 Q Right. And this is what Kristin Keeffe told you that she
7 wanted done because it was being provided in a lawsuit.

8 A What she told me in 2017, yes.

9 Q Right. So at the time that you are doing this, no one
10 had told you that this was being done in connection with a
11 lawsuit, right?

12 A Correct.

13 Q You didn't learn until 2017 when you spoke to Kristin
14 Keeffe that this is what this project was, right?

15 A Yeah, I understood -- then I understood it was discovery.

16 Q Now, does Kristin Keeffe know all the different video
17 projects you're doing back in --

18 A At that time?

19 Q Does Kristin Keeffe in 2017 know all of the projects that
20 Mark Vicente is doing in the video unit in the summer of 2008?

21 A I don't know how to answer that question. I can't speak
22 for her.

23 Q And your sole basis for thinking that what you're doing
24 here for legal, for the legal project related to discovery, is
25 what Kristin Keeffe told you nine years later.

1 A You can that again?

2 Q Sure.

3 Your sole basis for believing that this tape dubbing
4 was in connection with discovery in a lawsuit, is based on
5 what Kristin Keeffe told you in 2017.

6 A Yes, I think in addition I did some reading. And then I
7 came to that conclusion.

8 Q What did you read?

9 A I cannot remember.

10 Q But this is something --

11 A I read voraciously in 2017.

12 Q How often did you and Kristin Keeffe talk in 2017?

13 A I'd say we spoke maybe seven, eight times, and then we
14 stopped communicating.

15 Q And who called who first?

16 A I think she called me first.

17 Q At what --

18 A Yes, she did call me.

19 Q At what point did she tell you that the video editing and
20 dubbing that you were doing nine years earlier was part of
21 giving information over in discovery in a lawsuit?

22 A At what point in the sequence of phone calls?

23 Q Was it the first phone call? Was it the seventh phone
24 call?

25 A Honestly, sir, I can't remember.

1 Q All right. I'm going to show you what's in evidence as
2 1385R.

3 (Exhibit published.)

4 MR. AGNIFILO: This is a -- I'll scan it back a
5 little bit.

6 1395R is already in evidence.

7 Q So this is July 12th -- it's the same date as what we
8 just saw in Defendant's Exhibit 340, that being July the 12th.

9 And this is from Ken Kozak to yourself copying
10 Adrian, Chris and Dan Bratman.

11 Do you see that?

12 A Yes, I do.

13 Q And it says here: Marco, we've had some delays. As of
14 later tonight, approximately nine, all the VHS copies will
15 have been made, and we're all taking turns on the mini-DV
16 decks to get our copies out.

17 Which project is this?

18 A My understanding it's the same -- the same legal project.

19 Q And is that because it says: Legal project timelines on
20 top?

21 A Yes, but also because I'm talking about VHS, because we
22 weren't using VHS anymore at that point. This is the only
23 instance where VHS was used. The other instance, I think, was
24 the what's called the digitization of some of Raniere's
25 material at one point.

1 Q All right. And so what were you doing with Ranieri's
2 material?

3 A There was a request to -- to save his material. Some of
4 the stuff was on analog, just save it.

5 Q Okay. So that's different than the basement project?

6 A The basement project is a manual labor project. So I
7 would say absolutely different.

8 Q Okay. What were you doing with the tapes that were in
9 the basement? Were you putting them in some other form where
10 they could be better?

11 A I don't understand what tapes in the basement, sir.

12 Q What was the basement project?

13 A Cleaning the basement.

14 Q That's it, just a cleaning project?

15 A Organizing and cleaning the basement.

16 Q All right. So it wasn't a taped project?

17 A There was no -- there was no project involving tapes --

18 Q So tell us about the Ranieri --

19 THE COURT: Let him finish.

20 MR. AGNIFILO: I'm sorry, Judge.

21 THE COURT: Finish the statement.

22 A No, it's just there's no editing project in the basement.
23 The basement was storage.

24 Q What's the Ranieri project?

25 A That was just, at some point, the team was asked to start

1 digitizing his -- his I think it's old training tapes or
2 something. I have no idea what they were.

3 Q And do you have a clear recollection of when this started
4 and when this ended?

5 A My sense is that was later, because it was around the
6 time the RAID system was purchased. The RAID system being a
7 very large 48-terabyte, ridiculously expensive machine. That
8 was in Rome Plaza.

9 And that would have been later, because the office
10 in Rome Plaza, we had, I think starting around 2014, I
11 believe.

12 Q Do you remember working on a digitization project in
13 2006?

14 A You need to -- I mean --

15 Q Well, I'm going to show you something just to refresh
16 your recollection.

17 A Sure.

18 Q If it does.

19 THE COURT: Show it to him.

20 MR. AGNIFILO: Yeah, I'm going to.

21 MR. LESKO: Do you have an exhibit number?

22 MR. AGNIFILO: I just -- we don't.

23 MR. LESKO: We haven't seen --

24 THE COURT: Show it to the government and then you
25 can show it to the witness.

1 What's on the screen there? Is something on the
2 screen?

3 MR. AGNIFILO: Yeah, no. That was the last exhibit.

4 THE COURT: Just take it off.

5 MR. AGNIFILO: Just take it off.

6 THE COURT: To avoid confusion.

7 MR. AGNIFILO: I'll give it to Your Honor as well.

8 THE COURT: You can show it. Is this page 1?

9 MR. AGNIFILO: Both pages.

10 THE COURT: Show it to the witness. Thank you.

11 BY MR. AGNIFILO:

12 Q Sir, I'm going to show you two pages. I just want you to
13 look at it for the time being.

14 A Okay.

15 (Whereupon, the witness is reviewing the document.)

16 Q Let me when you're done, I'll show you the second page.

17 A All right. The second page. Thank you.

18 (Whereupon, the witness is reviewing the document.)

19 THE COURT: Is there all right.

20 MR. AGNIFILO: I want --

21 THE COURT: Do you want to mark it?

22 MR. AGNIFILO: I'm going to bring it up so you can
23 read the whole page.

24 There you go.

25 (Whereupon, the witness is reviewing the document.)

1 A So, yes.

2 Q All right. Does this refresh your recollection?

3 A Yes.

4 Q Okay. And what's your recollection?

5 A There was discussing the idea of getting something called
6 Xserve, which is the RAID system that I mentioned. Because
7 everything was basically just lying around, and there was no
8 system whereby you could find, you know -- can you find this
9 particular day or this thing that he said, and so the idea was
10 to put everything into one digital system to be able to find
11 everything, via keywords.

12 Q And you agree with me that the email you just saw is from
13 2006?

14 A That's what it says, yes.

15 Q And this is an email that you yourself sent to Nancy
16 Salzman and Pam Cafritz, correct?

17 A Yes.

18 Q All right. And it attaches this second page that you
19 just looked at which, hopefully, will not be blurry, right?

20 (Whereupon, the witness is reviewing the document.)

21 A Yes.

22 MR. AGNIFILO: Your Honor, I offer it at this point.
23 We'll put an exhibit sticker on it. It will be 344, Your
24 Honor.

25 MR. LESKO: Objection.

1 THE COURT: Sustained.

2 Q Do you recall sending this email on Friday, August 25th,
3 2006?

4 A I don't.

5 MR. AGNIFILO: Your Honor, can we approach?

6 THE COURT: Okay.

7 (Continued on the next page.)

8 (Sidebar conference.)

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1 (The following occurred at sidebar.)

2 THE COURT: Yes.

3 MR. AGNIFILO: This is not being offered for the
4 truth. It's being offered to show the date. He thinks it's
5 later. It's not later. It's 2006.

6 THE COURT: If you asked him what was the date, and
7 he says it was two -- he remembers it was in 2007, or 2006.
8 You have your admission.

9 Why do we need to clutter this with hearsay?

10 MR. AGNIFILO: It's not hearsay. It goes --

11 THE COURT: It's hearsay.

12 MR. AGNIFILO: Judge, it's not hearsay. It's
13 affirmative.

14 THE COURT: Send me a memo about why it's not
15 hearsay.

16 MR. AGNIFILO: You don't want a memo?

17 THE COURT: I don't. I think it's a way to get you
18 to stop telling me this.

19 MR. LESKO: Your Honor, we agree, Your Honor.

20 Mr. Agnifilo just acknowledged he's offering the
21 document to prove that the date was 2006, the truth of that
22 fact. And the witness has frankly acknowledged that so.

23 THE COURT: Yes, he's already given you the answer
24 that you required.

25 So I don't understand why we have to have a debate.

1 There must be something else in there that you want to put in.

2 MR. AGNIFILO: No.

3 THE COURT: Well, I don't know that. All I'm saying
4 is ask him the questions. If he doesn't remember, then show
5 him the document, and then ask him, you know, does that
6 refresh his recollection?

7 MR. AGNIFILO: Okay. We'll do that. That will take
8 seven minutes and --

9 THE COURT: And then what?

10 MR. AGNIFILO: And then what? I'm going to keep
11 coming back until this trial is over.

12 THE COURT: I mean with this witness.

13 MR. AGNIFILO: No, I'm not -- I probably have
14 another 45 minutes to an hour. He was on direct for three
15 days. I'm going to finish.

16 THE COURT: It's not an application. I'm just
17 trying to get a -- I heard it was going to be three and a half
18 hours.

19 MR. AGNIFILO: Well, it'll end up being four hours.

20 THE COURT: Yeah, maybe five.

21 MR. AGNIFILO: Maybe five.

22 All right, Judge.

23 (End of sidebar conference.)

24 (Continued on the next page.)

25

1 (In open court; Jury Present.)

2 THE COURT: Okay.

3 MR. AGNIFILO: Few more questions on this,
4 Mr. Vicente, and then we'll let you go for the day.

5 BY MR. AGNIFILO:

6 Q All right. Now, in terms of this particular project, you
7 mention that it's going to be done at three different
8 locations; Twilight which is your house, correct?

9 A Correct.

10 Q All right. What's Grant Hill?

11 A Grant Hill was the house that Nancy Salzman originally
12 lived in before she moved to 3 Oregon Trail.

13 Q And P's house? What's P's house?

14 A P's house, I believe, is 3 Oregon Trail.

15 Q And P's house meaning prefix house?

16 A Yes.

17 Q Nancy Salzman's house?

18 A Yes.

19 Q All right. And tell us exactly, now that you've seen
20 this, and it refreshes your recollection, what is this
21 project? What are you all doing?

22 A This later was named -- much later was named The Truth
23 Project. It was basically to save his words and his video,
24 and develop a system of categorization.

25 It was for a while called The Server Project.

1 Q The Server Project?

2 A The Server Project because it was, you know, the server
3 was purchased for this reason.

4 But it was a system to -- because what would happen
5 is people would say, you know, do you remember when, you know,
6 Vanguard said such and such and everybody would like look at
7 each other, like a bunch of idiots. So the suggestion was,
8 well, why don't we just put everything on the server where you
9 can search for using key words, much faster, much more
10 efficient. Yes, it costs money up fronts, but it will be
11 better in the long run.

12 Q And fair to say this was a long-term project?

13 A Well, it started and then failed, because people didn't
14 want to do it. They felt that the salary was just too low so
15 they had no interest. So it stopped for many, many years.

16 And then the server, due to inactivity, wasn't
17 functioning anymore, so it was offline, and then sometime
18 after 2014 it, was in the Rome Plaza office being repaired,
19 and I think the project began again.

20 Q I'm going to show you what's been marked in evidence as
21 1397.

22 MR. AGNIFILO: This is already in evidence. So the
23 jury can see it.

24 (Exhibit published.)

25 Q Now, you said this was a memorandum that you wrote?

1 A That's my understanding. It was a memo. I don't know
2 that there's an email associated with it.

3 Q Okay. So this is a memo that you wrote and then handed
4 out to who?

5 A I can't be sure. I don't know if I handed it out, or if
6 it was attached to an email. I don't -- I don't know that.
7 But I'm assuming it was a team, a team at the time.

8 Q Now, you gave a number of emails to the FBI in July of
9 2018, correct?

10 A I don't recall the exact date.

11 Q Do you remember giving the FBI --

12 A Some emails.

13 Q -- some emails.

14 You didn't give them all of the emails -- you didn't
15 give them all of your emails, correct?

16 A No. You mean every single one?

17 Q You did a search, right?

18 A Yes, I -- yes.

19 Q And you gave them the emails you wanted to give them and
20 you didn't give them the emails you didn't want to give them;
21 fair to say?

22 A Well, I had to go find an email address that I no longer
23 used, because I used this particular email address the -- I
24 think it was the MarkVicenteme.com, I think, for the first two
25 or three years. So I went to that -- that batch.

1 Q Okay. Now, in this memorandum, you have a to-do list for
2 starting Monday, June 30, 2008.

3 What is this project?

4 A My understanding is the same project.

5 Q Same project as --

6 A The legal project.

7 Q The legal project.

8 A Yes.

9 Q So your understanding, now, when you say your
10 understanding, are you sure? Are you clear that it's the
11 legal project and not the Raniere project?

12 A It's not the Raniere project.

13 Q And how do you know?

14 A Because there's -- purchasing of multiple machines
15 doesn't make sense for that project.

16 That project was -- the cataloging server project
17 was just, you know, one kind of machine.

18 Q Now, I want to show you --

19 MR. AGNIFILO: This is government's 1396 already in
20 evidence.

21 (Exhibit published.)

22 BY MR. AGNIFILO:

23 Q I think we looked at, but people involved here, there's
24 Chris. There's Nancy Salzman. There's Clare Bronfman.
25 There's yourself and there's Kristin Keeffe, right?

1 A Yes.

2 Q Okay. And you're saying this is the legal project,
3 right? Correct?

4 A That's my understanding, yes.

5 Q I want to show you 1395R also in evidence.

6 (Exhibit published.)

7 Q We have Ken Kozak, Mark Vicente, Adrian, Chris and Dan
8 Bratman, right?

9 A Yes.

10 Q Other than you and Chris, everybody else is different,
11 right?

12 A Well, these -- these are the worker bees, so to speak,
13 and the upper echelons didn't need to be part of this
14 discussion.

15 Q Ken Kozak is a worker bee?

16 A Well, in the sense of this crew. Legal and crew were not
17 necessarily exactly the same people.

18 Q And what was Chris' role?

19 A Chris, at that point, was managing the team for me.

20 Q And in this email, we don't have Nancy Salzman on this
21 email. We don't have Clare Bronfman on this email. And we
22 don't have Kristin Keeffe on this email --

23 A That's right.

24 Q -- 1395R, correct?

25 A Yeah, they didn't need to be involved in minutia. This

1 is minutia.

2 Q And how was this different? Here we're talking about --
3 and here we have Chris, Salzman, Bronfman, Vicente, Keeffe,
4 1396.

5 This is details about edits, where it's going to be,
6 that it's going to be in 13 Twilight?

7 A I was combining things, because there would be a purchase
8 required. It was a confirmation of the request. So I had to
9 involve them as well.

10 Q So when you say there's a purchase required, you're
11 talking about buying one new VCR, right?

12 A Yes.

13 Q And --

14 A That's what I understood at the time.

15 Q And Chris is saying: I need one anyway. So I'll buy it.
16 That's a high level? That Chris needs a VCR and she's going
17 to buy one for herself? We need to tell that to the
18 high-level people?

19 A I misunderstood. I actually thought that I sent this
20 email and now that I am reading that I didn't. So it might be
21 better to check her reasoning, because the reasoning I gave
22 you was with the assumption that I wrote this.

23 Q So you're make an assumption. Your answer was making an
24 assumption thinking that you wrote this?

25 A For a moment I thought that I was the one initiating this

1 email. So I made the assumption of like the minutia versus
2 things that had be to checked with those that had the
3 purchasing power, based on that misunderstanding. You are, in
4 fact, correct. It is from Chris.

5 MR. AGNIFILO: Your Honor, we can stop for the day
6 if this is good time.

7 THE COURT: All right. All right. We're going to
8 adjourn for the evening, members of the jury.

9 Again, let me remind he you it's extremely important
10 that you follow my instruction that you not discuss the case
11 with anyone; not your family, your friends, or your business
12 associates, and not your fellow juror.

13 In addition, you must not read, listen to, watch,
14 access any accounts of this case on any form of media,
15 including newspapers, TV, radio, podcasts or the internet, and
16 not research or seek outside information about any aspect of
17 the case.

18 Also, please do not communicate with anyone about
19 the case on your phone, whether through email, text messaging,
20 or any other means, through any blog or website, or by way of
21 any social media, including Facebook, Twitter, Instagram,
22 YouTube or similar sites.

23 Also, you must not consider anything you may have
24 read or heard about the case outside of the courtroom, whether
25 you read it before or during the jury selection process, or

1 during this trial.

2 Do not attempt any independent research or
3 investigation of the case.

4 Do not visit any of the locations identified in the
5 questionnaire or discussed during the course of jury selection
6 or the trial.

7 If you are taking notes, please leave them in the
8 jury deliberation room.

9 I'll see you tomorrow morning at 9:30. Thank you
10 for your attention.

11 All rise for the jury.

12 (Jury exits the courtroom.)

13 THE COURT: All right. The witness may stand down.
14 Please do not discuss your testimony with anyone.

15 THE WITNESS: Yes, Your Honor.

16 THE COURT: We'll see you tomorrow morning at
17 9:30, sir.

18 (Whereupon, the witness steps down.)

19 THE COURT: Is there anything else from the parties
20 for this evening?

21 MR. AGNIFILO: No, sir. Nothing from us, Judge.

22 MS. PENZA: Not from the government.

23 MR. LESKO: Actually, we have one minor matter.

24 THE COURT: All right. Please be seated, everyone.
25 Yes, one minor matter.

1 MR. LESKO: Your Honor, I believe that we, the
2 government, introduced and we have -- and the Court admitted
3 Exhibit 1002, which is the audiotape.

4 THE COURT: Yes.

5 MR. LESKO: And I believe counsel consents that
6 really what we want to admit are the snippets that were played
7 before the jury, because there's other portions of that
8 audiotape that Your Honor has addressed in a ruling.

9 And so I think on consent, we'll create a new CD
10 with just the snippets.

11 THE COURT: Yes, call it 1002A.

12 MR. LESKO: A.

13 THE COURT: And then once you have agreed on the
14 contents, we can admit that and remove the 1002.

15 MR. LESKO: Thank you.

16 THE COURT: Is that agreeable?

17 MR. AGNIFILO: Yes, it is.

18 MR. LESKO: Thank you, Judge.

19 THE COURT: Okay. So about how much more do you
20 have for tomorrow morning?

21 MR. AGNIFILO: Less than an hour.

22 THE COURT: Less than an hour. Okay.

23 Do you expect that there will be substantial
24 redirect?

25 MR. LESKO: Yes. Not more than an hour, I would

1 imagine.

2 THE COURT: Which means there may be some recross.
3 You can say it. You can say it. It's all right.

4 MR. AGNIFILO: There could be more recross.

5 THE COURT: And then the next witness is?

6 MR. LESKO: If I could have a moment.

7 (Pause.)

8 MR. LESKO: Stephen Herbits, Your Honor.

9 THE COURT: Stephen Herbits?

10 MR. LESKO: Herbits, correct.

11 THE COURT: How long will his direct take?

12 MR. LESKO: Very brief.

13 THE COURT: Okay. Do you know about this witness?

14 MR. AGNIFILO: I know about him. I don't know what
15 he add to the trial, but I'm excited to see.

16 THE COURT: But you know. You've heard of him.

17 MR. AGNIFILO: I have.

18 THE COURT: Well, that's a work in progress.

19 So -- and if his -- you should have him done
20 tomorrow.

21 MR. AGNIFILO: Oh, he'll be an hour, maybe. Total.

22 THE COURT: And -- well, after that? Do you
23 anticipate another witness tomorrow?

24 MS. PENZA: Yes, Your Honor. Then Mr. Herbits has
25 to be finished by tomorrow, which is why we're switching the

1 order.

2 THE COURT: Okay.

3 MS. PENZA: And then we will be putting on
4 Investigator Fontanelli after that.

5 THE COURT: And how long do you expect he will be on
6 the stand?

7 MS. PENZA: I expect --

8 THE COURT: Since he's -- his role, you know, his
9 testimony should be extremely limited, I would imagine.

10 MS. PENZA: He's also going to testify, Your Honor,
11 regarding a map and kind of setting the stage of the
12 properties in Clifton Park, so it's beyond what we've already
13 discussed with Your Honor. But I still think an hour and a
14 half approximately for his direct.

15 THE COURT: Okay. And then? That would be bring us
16 to Friday morning, I assume.

17 You know, it is now -- this is Wednesday. Today is
18 Wednesday. Friday is only two days away.

19 We have an understanding, right?

20 MR. AGNIFILO: We do.

21 THE COURT: About 48 hours.

22 MS. PENZA: We've already disclosed our next
23 witness, I believe, to the Court and to defense counsel.

24 MS. HAJJAR: Your Honor, that witness we expect the
25 direct will almost certainly last to the weekend.

1 THE COURT: You mean it will last until next week?

2 MS. HAJJAR: It will last until next week.

3 THE COURT: We're not going to the weekend.

4 MS. HAJJAR: No. But it will -- the direct
5 examination --

6 THE COURT: Unless you want me to.

7 MS. HAJJAR: Thank you, Your Honor.

8 THE COURT: I'm available Saturday and Sunday.

9 MS. HAJJAR: Defense counsel has not objected if the
10 government continues to meet with that witness over the
11 weekend, so we just wanted to advise the Court of that to
12 review certain exhibits that will likely not be offered until
13 the following week.

14 MR. AGNIFILO: As long as the witness is not on
15 cross, that's fine with us.

16 THE COURT: That's fine. Thank you very much.

17 Okay. Well, I just wanted to get a sense and this
18 is a cooperator, I think.

19 MS. HAJJAR: Yes.

20 THE COURT: All right. Thanks very much.

21 MR. AGNIFILO: Thank you, Your Honor.

22 THE COURT: Have a good evening.

23 * * * * *

24 (Proceedings adjourned at 5:08 p.m. to resume on
25 May 16, 2019 at 9:30 a.m.)

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