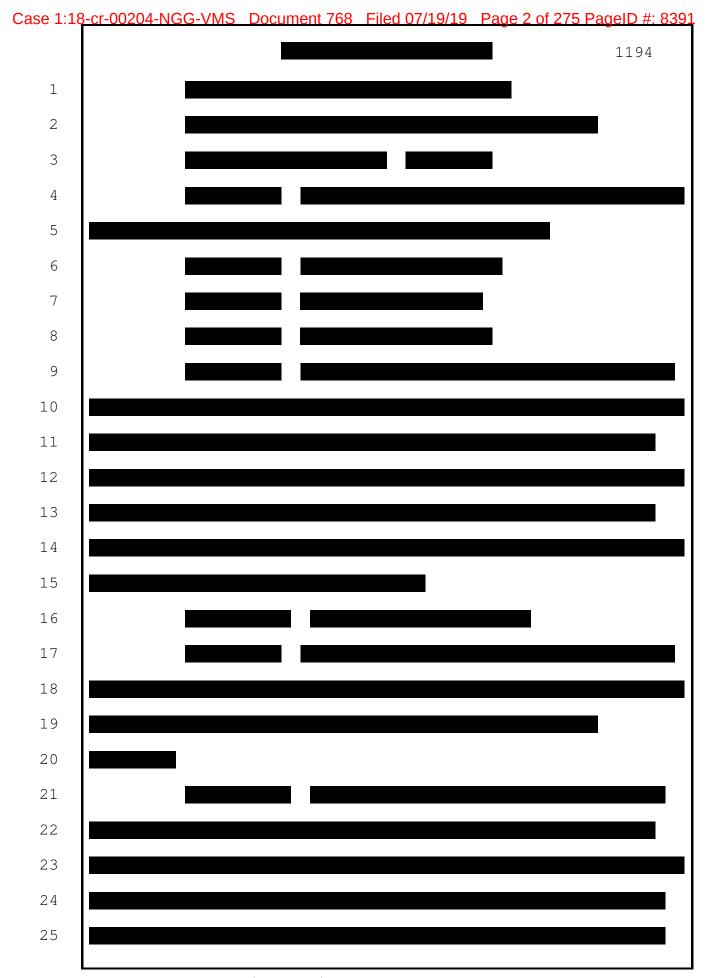
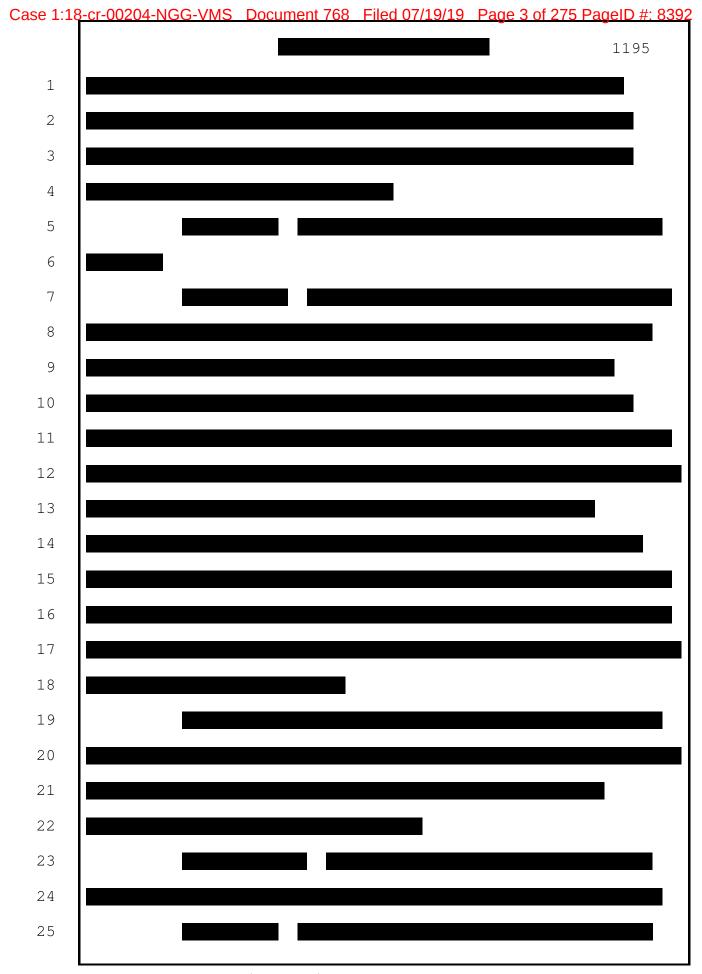
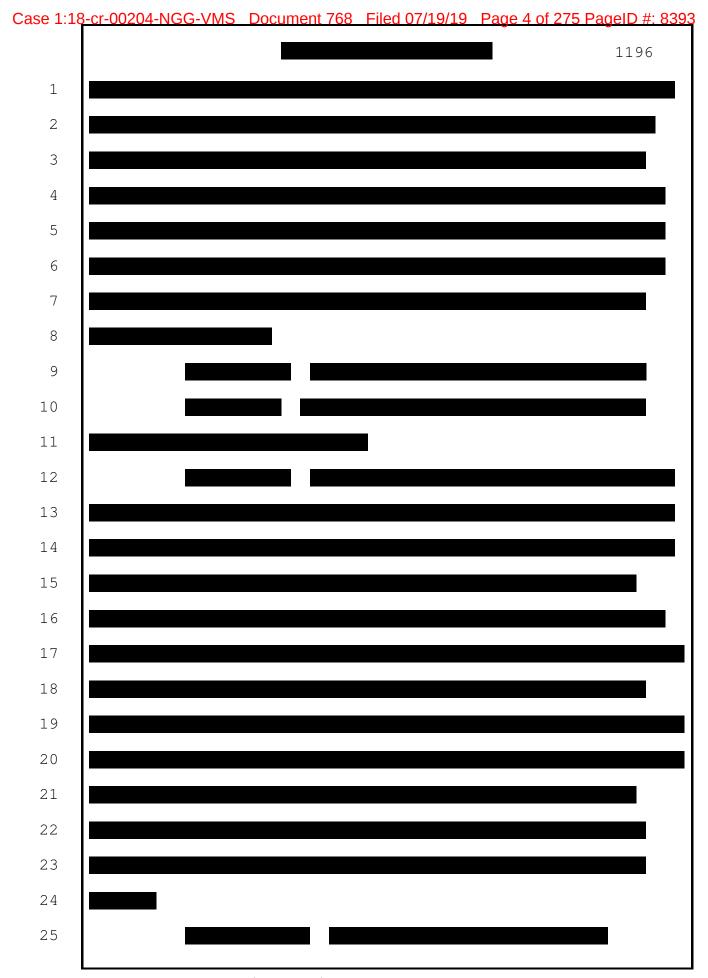
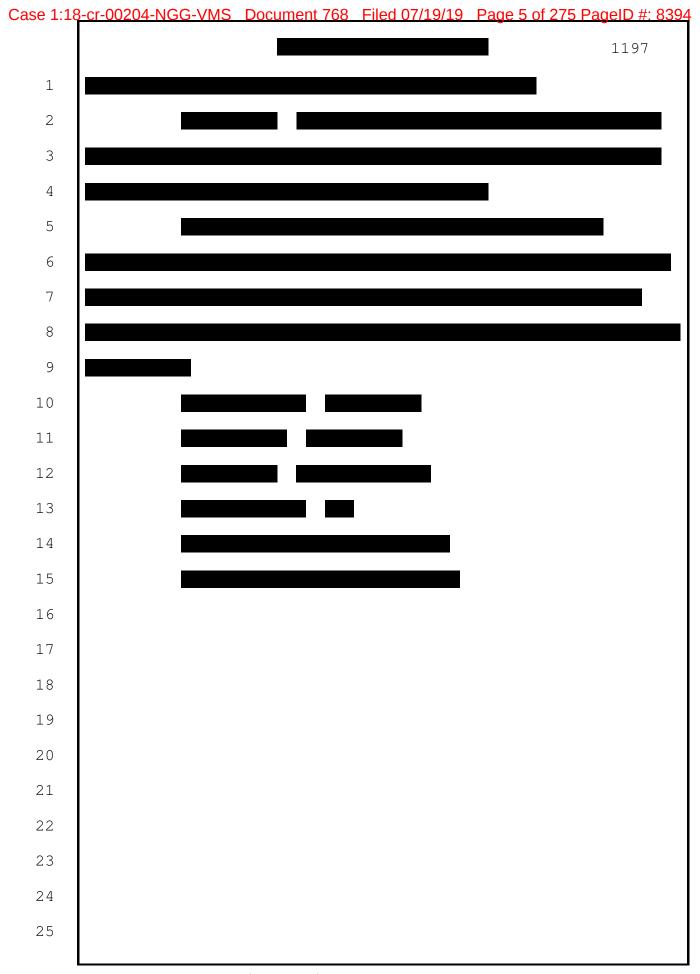
Case 1:18-cr-00204-NGG-VMS		
	1193	
1 UNITED STATES DISTRICT		
EASTERN DISTRICT OF NE	x	
3 UNITED STATES OF AMERI	18-CR-204 (NGG) ICA,	
4 Plaintiff,	United States Courthouse Brooklyn, New York	
5 -against-	May 16, 2019	
6 KEITH RANIERE,	9:30 a.m.	
7 Defendant.		
	x	
	TRANSCRIPT OF CRIMINAL CAUSE FOR TRIAL BEFORE THE HONORABLE NICHOLAS G. GARAUFIS	
9 UNITED ST	UNITED STATES SENIOR DISTRICT JUDGE  BEFORE A JURY	
0 ADDEADANGEG		
APPEARANCES		
For the Government:	UNITED STATES ATTORNEY'S OFFICE Eastern District of New York	
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Court Reporter:	TERI CARBY, PARALEGAL SPECIALIST LINDA D. DANELCZYK, RPR, CSR, CCR	
1	Phone: 718-613-2330 Email: LindaDan226@gmail.com	
	by mechanical stenography. Transcript	









- 1 Q I'll mark it as 326 for identification. I'm just going
- 2 to show it to the witness. It says 326 on the bottom, and the
- 3 date, January 5, 2016, correct?
- 4 A I didn't see the date -- sorry -- it's right there, yes.
- 5 Q Do you recall this letter as you sit here today?
- 6 A Yes.
- 7 Q Fair to say it was a fairly critical letter of the
- 8 executive board at the time?
- 9 A Of the entire system.
- 10 Q Okay. You were expressing criticism of the system. And
- 11 when you say the system, tell the jury what you mean by the
- 12 system?
- 13 A I was concerned about the way we were treating people.
- 14 was concerned about the disparity between what we said we were
- about and what we seem to actually be doing to people. So in
- 16 that sense I had a lot of concerns.
- 17 Q Do you remember saying that the fixes that have been
- 18 implemented so far have been nothing more than Bandaids, words
- 19 to that effect?
- 20 A I'd have to read it again.
- 21 Q Sure, let me show it to you. I want to scan it back a
- 22 little so you can get more context.
- 23 (Witness reviewing document.)
- 24 Take your time and read it over to familiarize
- 25 yourself with it. I'll ask you questions when you're done.

- 1 A I recall the Bandaid comment.
- 2 Q What were you conveying to the executive board when you
- 3 said that the fixes done so far are really just Bandaids?
- 4 A I don't know specifically now what I meant by the fixes
- 5 done thus far.
- The Bandaids I think was in reference to we keep
- 7 going into coach summits doing rah rah, yeah yeah, enroll,
- 8 enroll, but that's not solving anything.
- 9 Q Do you remember saying to the executive board that the
- 10 technology that NXIVM had was the best thing that you would
- 11 ever see?
- 12 A I would have to see that section.
- 13 Q Sure, sure. So it's in the paragraph that says, The
- 14 | first thing I see is. And then it's I think four lines
- 15 down -- three lines down.
- 16 (Witness reviewing document.)
- 17 A I've gotten up to, Whisper behind their backs.
- 18 Q I think you lost me.
- 19 A On the left, Whisper behind their backs.
- 20 Q Can you read the whole letter, if you want. I was
- 21 directing you to one particular point.
- 22 A Can you point to the specific question?
- 23 O You see it?
- 24 A I see it.
- 25 Q Take a look at that part. You can look at anything you

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1 | want, but that's the part I'm directing your attention to?

- 2 A I see that.
- 3 Q Okay. And when you wrote to the executive board that our
- 4 technology is the best thing you've ever seen, what were you
- 5 conveying to them?
- 6 A Two things. One, I was trying to mitigate punishment.
- 7 So making sure that I still edified everybody, and edify the
- 8 technology.
- 9 The second was that at that time what I thought it
- 10 did was I believed at that time, you know.
- 11 Q You believed at the time that the technology was the best
- 12 thing you'd ever seen?
- 13 A At the time.
- 14 Q When you say technology, tell the jury what you mean by
- 15 technology?
- 16 A Technology was -- the short word they used was tech. The
- 17 technology was in essence rational inquiry, the body of
- 18 educational material and the EMs, the Expiration of Meaning.
- 19 Q When you say rational inquiry, tell the jury what you
- 20 mean by that?
- 21 A My best understanding of rational inquiry is that was the
- 22 name of patent, an increase system, EMs were an example of
- 23 that.
- Q Patent, do you know who held the patent?
- 25 A I don't. Because since then I've learned perhaps that

- 1 there was no patent or it was rejected, so I don't know.
- 2 Q What is the rational inquiry concept?
- 3 A From what I remember, the way it was written, it's a
- 4 series of questions to help a person somehow integrate their
- 5 internal understanding of reality with actual reality.
- 6 Q I want to turn to the second page of this letter. Let me
- 7 let you read the second page, then I'll direct you to a
- 8 particular part. Take a look then I'll direct you to one
- 9 particular part.
- 10 A So read the whole thing?
- 11 Q Yes, to yourself.
- 12 (Witness reviewing document.)
- Fair to say that one of things that you wanted to
- 14 convey in this letter is that the leaders of NXIVM ESP were,
- in your view, arrogant. You used that word several times?
- 16 A I said we were arrogant, yes.
- 17 Q When you are saying to the executive board, We have
- 18 arrogance and an excuse strategy. What are you conveying to
- 19 the executive board?
- 20 A That we are arrogant and have a series of excuses.
- 21 Q But in what context? When you wrote these words
- 22 arrogant, about what?
- 23 A Our behavior, our leadership.
- 24 Q So fair to say you're being critical of the executive
- 25 | board in terms of the executive board's leadership, their

- 1 behavior, and you're basically saying that they are arrogant
- 2 in this letter?
- 3 A We.
- 4 Q Including yourself.
- 5 A Yes.
- 6 Q You say at one point here, The old guard is -- A lot of
- 7 | the old guard is straight up punishing. Do you see that
- 8 there?
- 9 A I do. I did see it.
- 10 Q When you said that the old guard is straight up
- 11 punishing, what are you talking about?
- 12 A Some the people who had been there a very, very long
- 13 time, the old guard, I think what I meant was basically people
- 14 who were there even before the time I was there.
- 15 Q So in that case, the people that you're saying are
- 16 punishing, you're not talking about yourself, you're talking
- 17 about who? Who specifically?
- 18 A Specific people?
- 19 Q Yes.
- 20 A I think I was thinking about people like Loretta Garza,
- 21 Nancy Salzman, people who have been there quite a while.
- 22 Q So here in this letter you're telling Prefect, among
- other people, that she's being punishing, right?
- 24 A Right.
- 25 Q Did anything happen to you after you sent this letter

- 1 that the old guard and Prefect was being punishing. And that
- 2 you all, including yourself, are being arrogant and doing
- 3 that, what happened to you?
- 4 A Do you mean specifically after the letter or as the years
- 5 went by?
- 6 Q Were you kicked out of NXIVM?
- 7 A For writing this letter?
- 8 O Yes.
- 9 A No, I don't think so.
- 10 Q Were you kicked out of NXIVM ever?
- 11 A Was I kicked out? No.
- 12 Q You resigned?
- 13 A I did.
- 14 Q You resigned a year-and-a-half later?
- 15 A I did.
- 16 O One of the things you go on to say on the bottom, I'm
- 17 going to focus you on one paragraph, starting with, This has
- 18 been. Read that to yourself, then I'm going to ask you a
- 19 | couple of questions about it.
- 20 (Witness reviewing document.)
- 21 A Done.
- 22 Q So you say in the letter that you're terrified to say
- 23 these things, you actually write that?
- 24 A That's correct.
- 25 Q Then you say, I did something like this once before with

- 1 another organization and things went south pretty badly.
- 2 Right?
- 3 A Yes.
- 4 O What is Ramtha?
- 5 A What is Ramtha?
- 6 Q Right.
- 7 A Ramtha is the -- how do I describe it. The spiritual
- 8 entity that a woman J.Z. Knight believes that she channels.
- 9 Q Were you a member of the Ramtha School of Enlightenment
- 10 at some time before joining NXIVM?
- 11 A I was.
- 12 Q What years were you there?
- 13 A I think various times between 1994 and I think 2004.
- 14 Q So for ten years?
- 15 A Yes, but I traveled backwards and forwards for ten years.
- 16 O You gave the name of a woman when I asked about Ramtha?
- 17 A The woman what has heads the organization is J.Z. Knight.
- 18 Q J.Z. Knight?
- 19 A Uh-huh.
- 20 Q Tell me if this is right, J.Z. Knight believes she is
- 21 | channeling a 35,000 year old warrior?
- 22 A That's my understanding.
- 23 Q It's your understanding because you were a member of the
- 24 group?
- 25 A It's my understanding because that's what she said again,

- 1 and again, and again.
- 2 Q How did you come to join Ramtha?
- 3 A Somebody referred me at one point and said, hey, you got
- 4 to check this out, I think in south Africa actually. And then
- 5 at some point went up and attended a weekend.
- 6 0 Where?
- 7 A That would have been Yelm, Washington.
- 8 Q They have a campus in Washington State, right?
- 9 A Yes, they call it the ranch but, yes.
- 10 Q Just give us a quick run-down of what would you do in
- Ramtha? What did you do in Ramtha?
- 12 A It was a body of knowledge. One thing I want -- I don't
- know how much I can say because I -- there may be issues by my
- 14 discussing things there. I don't know the legal issues for
- 15 me.
- 16 Q Like what?
- 17 A Getting sued for saying something. I don't know. I
- don't understand how the law works in this room. Maybe in
- 19 this room I can say anything that is mine.
- 20 MR. AGNIFILO: I would like permission to ask the
- 21 witness about his experience.
- THE COURT: You can, go ahead. You need to answer,
- 23 you're under oath. This a Court proceeding.
- MR. LESKO: May we have a side bar?
- THE COURT: Okay.

qo?

## SIDEBAR CONFERENCE

MR. LESKO: Your Honor, we haven't objected to this line of cross-examination. I frankly don't expect to object in the near term. But I would make the point that this is extensive cross-examination on the Ramtha affiliation. At some point we will start objecting if it goes too long and too detailed. I want to alert everyone to that factor.

MS. PENZA: Can we have a proffer of how far we'll

MR. AGNIFILO: I've never spoken to this witness. I don't know what he's going to say about it. He mentioned it obviously in his letter to the executive board, so I have the right I believe to explore it. I don't think the jury or anybody else wants to hear too much about Ramtha. I do intend to get the basic idea of what Ramtha is. I want to understand what his problem was that he referenced in the letter to the executive board. Because he seems to be linking his own fear, that's what he said when he said in the letter is, I'm terrified writing this I was with another organization and I did something similar and things went south pretty badly. I need to know what that statement that he made to the executive board in a letter means. I need the context for what that means.

MR. LESKO: We don't have the an issue with that.

The concern I have is Mr. Agnifilio dwelling or focusing intensely on aliens communicating to this woman and therefore

	SIDEBAR CONFERENCE 1208
1	to her followers.
2	THE COURT: 35,000 year old aliens.
3	MR. LESKO: That's unduly prejudicial and
4	inflammatory, and frankly a side-show.
5	THE COURT: Let's go forward. And when you think
6	things are irrelevant or
7	MS. PENZA: I think the word alien is irrelevant.
8	MR. AGNIFILO: But the jury has to figure out if
9	this man is trustworthy. Is he trustworthy. Is he someone
10	that we should make one of the things the Judge is going to
11	instruct on
12	I'm speaking. I'm speaking.
13	MS. PENZA: Speak to the Judge.
14	MR. AGNIFILO: Fair enough.
15	When the Court instructs the jury as to whether they
16	would rely on this person in making a serious decision in
17	their own life, I think they should know that he thinks that
18	it's good to join a group where a 35,000 year old warrior is
19	being channeled through a woman. I think that might be
20	something that they would want to consider in whether they
21	should trust him. I'm not going to dwell on it, but we're
22	going to talk about it and see what he says.
23	THE COURT: Well, I'll be watching. And if you have
24	an objection you'll let me know and we'll take it from there.
25	(End of sidebar conference.)

- 1 (In open court.)
- 2 THE COURT: You may continue.
- 3 MR. AGNIFILO: Thank you.
- 4 BY MR. AGNIFILO:
- 5 Q Have you met J.Z. Knight?
- 6 A I have met J.Z. Knight.
- 7 Q How much time have you spent with J.Z. Knight?
- 8 A I don't know that I can quantify it, a fair amount of
- 9 time.
- 10 Q Did you believe that J.Z. Knight was channeling a 35,000
- 11 | year old warrior?
- 12 A For a few years.
- 13 Q And how did you reach that conclusion?
- 14 A Belief versus evidence.
- 15 Q So there was no evidence that compelled you to the
- 16 conclusion that -- let me finish -- that J.Z. Knight was in
- 17 fact channeling a 35,000 year old warrior; fair to say?
- 18 A There was a evidence. But in retrospect I don't know
- 19 that I would have called it scientific evidence.
- 20 Q What was the evidence that J.Z. Knight was channeling a
- 21 | 35 year old warrior?
- 22 A They would bring in scientists to do a series of
- 23 | measurements, run a series of tests. The scientist would the
- 24 say, this is verifiable, this is really happening.
- 25 Q Did you reach a conclusion during your time in Ramtha

- 1 that J.Z. Knight perhaps was not channeling a 35,000 year old
- 2 warrior?
- 3 A Towards the end, yes.
- 4 Q What caused to you reach that conclusion?
- 5 A It didn't make sense in the end to me. I was challenged
- on something that didn't make sense. Then I felt I was
- 7 threatened in a way that didn't make sense.
- 8 Q How were you threatened?
- 9 A What I heard was that during a particular retreat
- 10 intensive she had allegedly said in front a thousand people
- 11 | that I'm going to die a terrible death. I realized, okay so
- 12 now a thousand people in that room that may decide that that's
- 13 what they should do, let me die a horrible death.
- 14 Q I misunderstood, J.Z. Knight said that of herself?
- 15 A No, allegedly she said it of me, that I would die a
- 16 horrible death in front of over a thousand very zealous
- 17 people.
- 18 Q That scared you?
- 19 A You could say that.
- 20 Q What you said in your letter to the executive board of
- 21 NXIVM, is that you're terrified to write these things because
- 22 you had done this once before in another group and things went
- 23 | south pretty quickly. That's a passage you just read.
- 24 A Yes.
- 25 Q So what happened?

- 1 A The organization turned against me.
- 2 Q Rampantly?
- 3 A The whole company.
- 4 Q Was that before or after you made the movie, What The
- 5 Bleep Do We Know?
- 6 A That was after it was made.
- 7 Q And What The Bleep Do We Know, you made with two other
- 8 people who are in Ramtha?
- 9 A Yes.
- 10 Q And was the movie, What The Bleep Do We Know, in someway
- 11 | related to the Ramtha philosophies?
- 12 A It was.
- 13 O How so?
- 14 A Many of the ideas in that film were ideas that were
- discussed in that educational model.
- 16 Q How did you end up leaving Ramtha?
- 17 A I'm not clear on that, what do you mean?
- 18 Q How did you leave? Did you resign? Were you kicked out?
- 19 How did it happen?
- 20 A No. I wrote a letter, then those things happened, then I
- 21 just never went back.
- 22 Q So you wrote a letter, and then Ms. Knight said the thing
- 23 about you dying a violent death.
- 24 A That's my understanding, yes.
- 25 Q So what was the letter about before the woman channeling

- 1 the 35,000 year warrior said these things?
- 2 A It was concerns about people back stabbing each other and
- 3 people saying things behind each other's back. And also I
- 4 didn't believe she was getting actual information. Because in
- 5 essence, I don't know if I said exactly this way, but I said
- 6 everybody is so busy kissing your ass, they are not telling
- 7 you the truth.
- 8 Q You said that to Ms. Knight?
- 9 A That was the kind of thing I think I said.
- 10 Q You were critical of the head of the program of Ramtha,
- 11 Ms. Knight?
- 12 A The entire system. I thought there was a problem with
- 13 the system.
- 14 Q So fair to say, what you're talking about when you write
- 15 the letter to the executive board in January 2016, the
- 16 reference you're making is your circumstances exiting Ramtha
- 17 years earlier, correct?
- 18 A Yes. And expressing myself and what I thought was going
- on as trying to help and the response was not good.
- 20 Q After you sent that letter to the executive board in
- 21 January, 2016, did Keith Raniere stop speaking to you?
- 22 A No, he did not.
- 23 Q Did you and he continue to speak about all matter of
- 24 subjects?
- 25 A We did. It changed slightly, but we did still.

- 1 Q Did he tell you in conversations that he valued your
- 2 input?
- 3 A He might have, I don't remember specific incident, but he
- 4 might have.
- 5 Q At one point I think in direct examination you were
- 6 talking about an arbitration between your wife, Bonnie, and
- 7 Allison Mack that Keith Raniere was playing the role of
- 8 arbitrator. Do you remember talking about that?
- 9 A I do.
- 10 Q Just tell the jury again what was the issue?
- 11 A The issue at that point I believe was that there were
- 12 issues that were going on in the source acting company that my
- 13 wife was pointing out, and regarding the way the leadership is
- 14 doing things, just excluding people from things and a whole
- 15 | series of things going on.
- 16 My wife had been trying to bring this to Allison
- 17 Mack's attention, and Raniere believed that everything had
- 18 been resolved. I said to him, It's not resolved. I said,
- 19 Things are still not working in the company.
- He then offer to do an arbitration.
- 21 Q Do you recall is this after the letter that you wrote to
- 22 the executive board in January 2016, this is sometime after
- 23 that?
- 24 A I don't recall.
- 25 Q Was it around the same time, only if you remember?

- A Again, I don't know the exact sequence.
- 2 Q Just take us briefly through the arbitration, what was
- 3 said, what was done, what, if anything, did Raniere do?
- 4 A My recollection was that he began the conversation asking
- 5 everybody if did everybody believed that everybody at this
- 6 table has good intent. Everybody nodded.
- 7 He then elicited from each person what the different
- 8 issues were. I recall that Allison Mack admitted that she had
- 9 been trying to destroy my wife, had a series of jealousies,
- 10 different things.

- 11 Raniere took Allison Mack to task for that and said
- 12 in essence, this is something you need to heal. He said to my
- wife, I think you've experienced some kind of loss of
- 14 | innocence because of experiencing something like this. That's
- 15 what I recall right now.
- 16 Q Do you recall during the summer of 2016, your wife had
- 17 professed to a number of people that she felt she had sort of
- 18 an enlightenment?
- MR. LESKO: Objection.
- THE COURT: Sustained.
- 21 Q Was there something, I'm not going to ask about
- 22 conversations between you and your wife. I'm not asking about
- 23 anything that you two discussed as a married couple. I'm
- 24 asking about things you observed and what you understood to be
- 25 kind of -- let me start again.

During the summer of 2016, did you have

2 conversations with Keith Raniere about something that your

3 wife was experiencing?

4 MR. LESKO: Objection.

5 THE COURT: Sustained.

- 6 Q Was anything of an emotional or spiritual nature, if you
- 7 understand the question, going on with your wife in the summer
- 8 of 2016?
- 9 A Well, she professed to have some kind of realization.
- 10 And Raniere said that he believed he understood what it was.
- 11 He explained to her what he believed it was, that is what I
- 12 recall.
- 13 Q You were privy to any of this?
- 14 A I think I was privy to one conversation, maybe, not all
- of them, but one of them.
- 16 Q What was that?
- 17 A I think that Raniere was explaining something about, you
- 18 know, I think he mentioned a Kundalini type thing. He said he
- 19 understood it well. And he knew what she was experiencing.
- 20 Q And if I could stop you there. Describe to the jury what
- 21 is a -- what do you mean a Kundalini type thing?
- 22 A Well, there is the old version of what it is and then I
- 23 think there is the version he was talking about. I'm not
- 24 exactly what he was talking about. But there is an old idea
- 25 in Eastern mysticism that I think they call it the awakening

- of the serpent, something like that. Some kind of an energy
- 2 goes up the spine, hits your head, and you have awareness.
- 3 That's my understanding of the ancient term.
- 4 Q I'm sorry, I interrupted you. Were you describing the
- 5 | conversation you were privy to?
- 6 A He said that he understood it and he said he would guide
- 7 her through her whatever experience this was.
- 8 Q At some point your wife Bonnie decided to leave NXIVM
- 9 EPS, correct?
- 10 A Yes.
- 11 Q That was January 2017?
- 12 A I believe so.
- 13 Q What were the circumstances that led to that?
- 14 A As far as I remember, she had gone to talk to him to
- 15 share concerns about what she was seeing, things that she felt
- 16 that the company was not run on the values that it was
- 17 suggested but there was a lot of fear, obligation, coercion,
- 18 that type of thing. I think his response, from what I recall,
- 19 was something like, you know, don't be the squeaky wheel,
- don't be the problem.
- 21 Q Were you present for that conversation?
- 22 A I was not present for that conversation, no.
- 23 Q And then your wife did leave the company?
- 24 A While later. She was trying to maintain her
- 25 responsibilities, and at a certain point she thought it was

- 1 time.
- 2 Q But you stayed?
- 3 A I did.
- 4 Q You stayed for five or six months?
- 5 A Until the end of May.
- 6 Q About five or so months?
- 7 A Yes.
- 8 Q On April 17, 2017, do you remember getting a phone call
- 9 from Catherine Oxenberg?
- 10 A April 17.
- 11 Q On or about that day?
- 12 A Could you refresh my memory?
- 13 Q Sure, I can do that. Let me ask you, your phone number
- 14 at the time ended in 5414?
- 15 A Correct.
- 16 Q Do you know by heart, I'm not going to ask you any full
- 17 | phone numbers at all during our talk here, any aspect of her
- 18 phone number at the time?
- 19 A Potentially the area code, but I don't know other than
- 20 that.
- 21 O An LA-based area code?
- 22 A I believe so.
- 23 Q Let me not ask you the date. Do you remember having a
- 24 phone conversation with Catherine Oxenberg in or about April
- 25 of 2017?

- 1 THE COURT: What year?
- 2 MR. AGNIFILO: 2017.
- 3 A I'm struggling to remember April. I believe May, but I'm
- 4 struggling to remember April.
- 5 Q April 17, 2017?
- 6 A It's possible. I think that was around the time of the
- 7 intensive. It's possible I may have called about lodgings for
- 8 one of the staff.
- 9 Q Why would you have called Catherine Oxenberg about
- 10 lodging?
- 11 A She had at various times housed staff that were in town
- 12 for intensives. I'm not saying this for sure, but that's
- possible.
- 14 Q Do you remember, you were having frequent contact in
- 15 April 2017 and throughout the spring with Sarah, correct?
- 16 A Sarah, yes.
- 17 Q Frequent phone calls, her calling you, you calling her on
- 18 a frequent basis?
- 19 A Right.
- 20 Q Catherine Oxenberg is not someone who you had as frequent
- 21 contact with, at least in April of 2017, is that fair to say?
- 22 A Yes, we hadn't spoken a lot. Not as frequent, no.
- 23 Q At some point you and Ms. Oxenberg did start speaking a
- 24 lot, right?
- 25 A In May I recall.

- 1 Q We'll stick with May. Maybe I'll show you something to
- 2 | refresh your recollection. Do you remember -- I'm going to
- 3 | show you something to refresh your -- to see if you can recall
- 4 the phone numbers. We provided it to the Government. It
- 5 doesn't have an exhibit number. I'm just going to show it to
- 6 him?
- 7 THE COURT: That's all right. You can show it just
- 8 to him.
- 9 Q I'm not asking you -- I'm going to ask you not to put any
- 10 numbers on the record. I'm just going to ask you to look at
- 11 them.
- 12 THE COURT: Does this have an exhibit number?
- MR. AGNIFILO: We're going to give it exhibit
- 14 | number. It's going to be 345, Judge.
- 15 THE COURT: For identification.
- MR. AGNIFILO: Right.
- 17 BY MR. AGNIFILO:
- 18 Q Let me ask you first, you see the highlighted line?
- 19 A I see the highlighted line, yes.
- 20 Q Does your phone number appear on the highlighted line?
- MR. LESKO: Objection. Withdrawn.
- THE COURT: You may answer.
- 23 A It does.
- 24 Q Without getting into any other digits, the other phone
- 25 number there is an LA-based area code?

24

- 1 (In open court.)
- 2 BY MR. AGNIFILO:
- 3 Q Mr. Vicente, when we broke briefly you were going to talk
- 4 about a conversation that you had that you recall in person
- 5 | with Catherine Oxenberg and from what you recall it was
- 6 May 2017?
- 7 A I think it was May.
- 8 Q And before you get to that conversation, I think we're
- 9 going to have a --
- 10 THE COURT: I'm going to give an instruction to the
- 11 jury. I'm permitting the witness to testify about what
- 12 Catherine Oxenberg said to him during these conversations,
- 13 conversation or conversations. I'm allowing this because
- 14 these statements of Ms. Oxenberg are relevant to Mr. Vicente's
- 15 state of mind and their effect on Mr. Vicente. But they are
- 16 | not being offered for the truth of Ms. Oxenberg's statements
- 17 themselves. Therefore, you are to consider these statements
- only to the extent that they had an impact on Mr. Vicente's
- 19 state of mind and their effect on Mr. Vicente and not for the
- 20 truth of the statements made by Ms. Oxenberg.
- MR. AGNIFILO: Thank you.
- 22 THE COURT: Let's proceed with the question.
- MR. AGNIFILO: Very good. Thank you, Judge.
- 24 BY MR. AGNIFILO:
- 25 Q With that understanding, you can tell the jury about the

- 1 conversation that you and Ms. Oxenberg had.
- 2 A My recollection is that I said that I was deeply
- 3 | concerned about India, her daughter. That I had some
- 4 understanding of some secret society that I thought she was
- 5 involved in. That I was concerned about her mental state, her
- 6 | weight, and that I thought she might be in danger. That's
- 7 what I recall.
- 8 Q The way you recall, you reached out to Ms. Oxenberg to
- 9 give her this information?
- 10 A No. It was a follow up conversation. I believe my wife
- 11 met with her first.
- 12 Q I see. Okay.
- 13 A And then I think what happened is that I went in person
- 14 to talk to her.
- 15 Q Right. And so you go to Catherine Oxenberg's house and
- 16 | you tell her the information that you just summarized for the
- 17 jury; fair to say?
- 18 A I believe so, yes.
- 19 Q Fair to say she was very concerned?
- 20 A At first I think she was -- my sense is she was just
- 21 taking the information in. Then she became concerned later.
- 22 Q You at the time were friendly with her daughter, India,
- 23 correct?
- 24 A I thought I was very friendly, yes.
- 25 Q Do you recall a time on or about the first week of May of

VICENTE - CROSS - MR. AGNIFILO 1225 1 CROSS-EXAMINATION (Continued) 2. BY MR. AGNIFILO: 3 Okav. And India was in Los Angeles at that time? Yes. 5 And were you in Los Angeles at that time? 6 Yes. 7 And you went to the home where India was, correct? Okay. 8 Yes. 9 Did you bring pies? Do you remember bringing pies? 10 I may have brought one or two. Cakes for her, yeah. 11 Okay. Okay. All right. 12 MR. AGNIFILO: This might be a good time to do it, 1.3 Judge. 14 If Your Honor wants to give the instruction because 15 I'm going to seque into what was said both ways. 16 THE COURT: What kind of pie was it? 17 THE WITNESS: Ice cream. 18 THE COURT: It was ice cream. All right. Members of the Jury, I'm permitting the 19 20 witness to testify about what India Oxenberg said to him. I'm 21 allowing this because these statements of Ms. India Oxenberg 22 are relevant to Mr. Vicente's state of mind and their effect 23 on Mr. Vicente, but they are not being offered for the truth 24 of the statements made by India Oxenberg; therefore, you are 25 to considered these statements only to the extent that they

- 1 | had an impact on Mr. Vicente's state of mind, and their effect
- 2 on Mr. Vicente, and not for the truth of the statements made
- 3 by India Oxenberg. Okay.
- 4 MR. AGNIFILO: Yes, thank you.
- 5 THE COURT: Go ahead.
- 6 BY MR. AGNIFILO:
- 7 Q Now, what do you recall you and India Oxenberg saying to
- 8 each other during this conversation?
- 9 A I recall giving the cakes and then I began sharing with
- 10 her I was very concerned about what she was involved in. And
- 11 then I was afraid for her and myself. And that I was also
- 12 concerned because I had seen her the day before, and then she
- 13 had had, I understood, immediately called somebody to say that
- 14 I was there.
- I thought is this like I'm being spied on? And I
- 16 | said I don't know what you're involved in, but I think it's
- 17 bad.
- 18 And then I -- I left.
- 19 Q You ran into her in a coffee shop previously, correct?
- 20 A I think -- yes, the day before when I was actually -- I
- 21 just -- I think I just picked up the pies.
- 22 Q Did you -- were you yelling at her?
- 23 A I think I was upset. I was scared for actually both of
- 24 us.
- 25 Q Your voice was raised?

- A More than it is now, yes.
- 2 Q Did you call her a monster?
- 3 A I -- did I call her -- sorry. I have no idea if I did or
- 4 not.

- 5 Q Did you yell at India that she was a monster?
- 6 A I don't recall that I did that.
- 7 Q Did you yell at India that she was spreading hate?
- 8 A I don't know if those were the exact words, but I
- 9 remember saying something like, you know, are you -- I was
- 10 concerned about her passing information on about me that could
- 11 get me into some kind of danger. That I recall. I don't
- 12 recall the exact words.
- 13 Q Did you tell her that her life was in danger?
- 14 A I don't -- I'm sorry. I can't recall the conversation
- 15 with that level of specificity.
- 16 Q And just to be clear, there are two conversations that
- 17 we've covered. There was the conversation that happened at
- 18 the time you bought the pies, or the cakes, whatever it was,
- 19 and then there was a second conversation at her house.
- 20 For the time being, I'm talking about the
- 21 conversation at her house.
- 22 A Yes.
- 23 Q Again, just -- so let's just talk about that conversation
- 24 specifically.
- 25 A Uh-huh.

- 1 Q You went there to confront India.
- 2 A No, actually I went there to deliver the pies. I was
- 3 hoping to, you know, just enjoy the party and maybe have an
- 4 opportunity to, you know, talk to her aside.
- 5 Q Did you stay?
- 6 A No, I left.
- 7 Q You didn't stay.
- 8 A I did not stay.
- 9 Q Right. You -- did you speak to Catherine Oxenberg at all
- 10 | when you were at this party?
- 11 A I don't think I spoke to her at that party, no.
- 12 Q The only one you spoke to when you went to this party was
- 13 India, right?
- 14 A Um, I think I also spoke to one of her sisters, I think,
- who answered the door.
- 16 Q And when you spoke to India, you told her her life is in
- 17 | danger; didn't you?
- 18 A I don't recall specifically. But that -- I did feel
- 19 that.
- 20 Q You felt when you were at the home and you were talking
- 21 to India, you felt her life was in danger, correct?
- 22 A I don't know. I do know I was very concerned about her.
- I was concerned that she was being used as an agent against
- 24 myself and others. I don't recall the specific language that
- 25 I used.

- Q Do you remember telling her that you believed your life was that danger?
- 3 A I do think I said something to that effect.
- 4 Q And tell the jury exactly what you remember saying to
- 5 India and how you said it about your life being in danger.
- 6 A Well, the sequence I remember is I went to the door. I
- 7 was intending to bring the pies, you know, maybe attend the
- 8 party. I was hoping to talk to India and share my concerns.
- 9 But when I saw her, I just decided that I couldn't
- 10 come in and I just told her I was very concerned about what
- 11 she was involved in. I was concerned about her spreading
- 12 information about me. I was concerned for my -- I think I was
- 13 concerned for my safety. I don't remember my exact words.
- 14 And concerned for hers. And I was worried that she was
- involved in something that was really bad.
- I remember she said to me she didn't know what I was
- 17 talking about. I think I said I think you do. And then I
- 18 decided to leave and not attend.
- 19 Q Do you remember her telling you that she's never been
- 20 happier?
- 21 A I don't -- but that is consistent with a lot of the --
- 22 the DOS women said.
- 23 Q And do you recall you saying in exchange that's what they
- 24 want you to think?
- 25 A Sir, I think you have a lot more information about this

- 1 | conversation than I do, because I don't recall that.
- 2 Q But you agree with me you weren't using with India the
- 3 tone of voice that you're speaking to the jury and to the
- 4 Court here today?
- 5 A I wasn't. I was quite afraid.
- 6 Q You were afraid. So it was an urgency about your
- 7 language; fair to say?
- 8 A I think so. I felt it was an urgent situation.
- 9 Q And you felt it was a threatening situation?
- 10 A Potentially, yes.
- 11 Q A threatening situation both to you and to India?
- 12 A Both, yes.
- 13 Q And were you trying convey to India that magnitude of
- 14 threat or fear; is that the fair to say?
- 15 A I can you ask the question one more time?
- 16 O Yeah.
- 17 You were presenting the situation with a great sense
- 18 of urgency; fair to say?
- 19 A Yes.
- 20 Q And ultimately, as you said, you did not stay at the
- 21 party. You delivered the pies or the cakes and you left,
- 22 right?
- 23 A That's correct.
- 24 Q Do you recall placing a phone call to Keith Raniere
- 25 within the week from the time that you saw India and illegally

- 1 yes.
- 2 Q Were you recording everybody?
- 3 A It's possible. It was an automated program. It's
- 4 possible.
- 5 Q So -- and this is on your cell phone?
- 6 A It was on a -- yes, an -- an Android, yes.
- 7 Q And so it's possible that all these phone calls you had
- 8 | with different people you recorded?
- 9 A No, because at a certain point I -- I think I erased the
- 10 program and I switched phones from Android to iPhone.
- 11 Q Now, after the situation that you described earlier with
- 12 India, where you brought the cakes and the pies and you left,
- 13 you followup contact with Catherine Oxenberg, correct?
- 14 A I did.
- 15 Q And you told Ms. Oxenberg, in substance, things didn't go
- 16 | so well with India. She's not really interested in talking to
- 17 me.
- 18 A Yeah, I think it was something like, you know, something
- 19 to the effect of, you know, I went to have a conversation and
- 20 I just got too scared.
- 21 Q And that's what you told Catherine?
- 22 A Something like that.
- 23 Q And you didn't bother trying to reach out to India again
- 24 in that period of time, correct?
- 25 A Well, I heard that she had called Raniere right after

- 1 that, so I realized not an option anymore.
- 2 Q Okay. Now, on May 23rd, was that the date you resigned
- 3 your position with NXIVM?
- A Can you say the date again?
- 5 Q Yeah. I think May 23rd?
- 6 A I think it was May 22nd.
- 7 Q All right. So May 22nd, May 23rd, that time period you
- 8 resigned your position with NXIVM.
- 9 A Yes, sir.
- 10 Q All right. And were you having very regular phone
- 11 | contact with Sarah throughout May 2017; fair to say?
- 12 A Yes, I was.
- 13 Q And you were having very regular contact with Sarah's
- 14 husband during May of 2017, correct?
- 15 A More toward the end.
- 16 Well, that's not actually true, because we were -- I
- just shot the pilot, so we were discussing a lot of the -- the
- 18 editing needs.
- 19 Q And what was your relationship with Sarah's husband?
- 20 A We were very good friends.
- 21 Q And had you been good friends a long time?
- 22 A We became better friends over the years. But we were
- 23 acquaintances at first and then we became friends.
- Q Okay. And I think you said yesterday that your first
- 25 | contact with the FBI was May 26th, 2017?

- 1 A I don't remember the exact date, but it was towards the
- 2 end of May.
- 3 Q All right. Do you recall if on May 26th, 2017, you
- 4 | called or were called by Sarah 18 times?
- 5 A I don't know the number, but it's possible. It was a
- 6 fair number of calls.
- 7 Q Now, why did you have so many conversations with Sarah on
- 8 the same day that you called the FBI for the first time?
- 9 A I can -- so I can deduce it by the relationship of these
- 10 two events, but I can't tell you for certain.
- 11 I'm --
- 12 Q You wanted -- you wanted information from Sarah so when
- 13 you spoke to the FBI, you would know what you're talking
- 14 about.
- 15 A I wanted to be accurate.
- 16 Q So you wanted to be accurate but with someone else's
- 17 information.
- 18 A Well, I was not in that secret society, so I -- I
- 19 couldn't offer my experience at that time.
- 20 Q Were you with Sarah when you placed the -- let me back
- 21 up.
- 22 Did you call the FBI on May 26th, or did they call
- 23 you?
- 24 A I think it was actually both. I think I called and then
- 25 they called me.

- 21 Q Right. You can't recall.
- 22 A Again, I'm assuming that I said that.
- 23 Q On the same day, May 26th, that you called the FBI for
- 24 | the first time and you spoke to Sarah all those times, you
- also spoke to Chris a number of times on the phone.

- Do you remember that?
- 24 A I remember numerous calls. I don't remember the exact
- 25 dates, but it's around about that time.

- 1 Q Okay. Do you remember the same time that you called the
- 2 FBI for the second time, you had 5 calls to or from Catherine
- 3 Oxenberg, 11 calls with Sarah, and 4 calls with Sarah's
- 4 husband, all on May 31st, 2017?
- 5 A That sounds consistent.
- 6 Q And why were you talking to Sarah so many times,
- 7 Catherine Oxenberg, and Sarah's husband, on the same day that
- 8 | you called the FBI for the second time?
- 9 A My recollection is there was a branding ceremony about to
- 10 take place, and I wanted to prevent those women from going or
- 11 help some of them to leave before they got branded.
- 12 And also I was trying to help Sarah get to the -- to
- 13 the FBI to have a meeting.
- 14 MR. AGNIFILO: Just bear with me one second.
- 15 Q Is it your recollection that you told the FBI that a
- 16 branding ceremony was about to take place?
- 17 A I don't specifically recollect if I said that.
- 18 Q I'm going to show you 3500-MV-1.
- 19 A Okay.
- 20 Q Fairly short. It's a two-page document. I'm going to
- 21 show you the first page and I will show you the second page
- 22 and you will tell me.
- 23 (Whereupon, the witness is reviewing the document.)
- 24 Q Can you read that okay?
- 25 A Yes.

mine had been treated by him at the request of -- of Raniere and Clare Bronfman. So I was worried.

MR. AGNIFILO: Your Honor might want to give the

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- 1 But at some point he said something like that to me, yes.
- 2 Q Do you remembering the meeting with the FBI on
- 3 December 5th, 2017?
- We're going forward a few months.
- 5 A Was that in -- was that in Los Angeles?
- 6 Q Yes. The Los Angeles office?
- 7 A Yes.
- 8 Q All right. And you told the FBI that Parlato said he had
- 9 a source in the legal department, correct?
- 10 A I don't know if I said -- told them that.
- 11 Q All right. I'm going to show you something, see if it
- 12 refreshes your recollection.
- 13 I'm just going to show this to you. This is
- 14 3500-MV-5. And I'm going to show you the third page and it's
- 15 highlighted on the top.
- 16 A I see it.
- 17 Q Do you remember telling the FBI that Parlato told you
- 18 that had he a source within the NXIVM legal department?
- 19 A I don't remember specifically telling them, but it is in
- 20 the report. Sure.
- 21 Q Did Parlato tell you that Kristin Keeffe -- that he pays
- 22 Kristin Keeffe for information?
- 23 A At some point he did. I don't remember when that was
- 24 exactly.
- Q Okay. And regardless of when it was, what do you recall

## SIDEBAR CONFERENCE 1242 1 (The following occurred at sidebar.) 2 THE COURT: All right. Okay. What seems to be the 3 trouble? 4 MR. LESKO: So Your Honor earlier called them state 5 of mind statements that were --6 THE COURT: Yes. 7 MR. LESKO: -- admitted, were admitted for a very 8 specific timeline because of the -- because in the witness' 9 mind that led to him to resign from NXIVM and led him to 10 report on DOS. 11 I think Mr. Agnifilo is using this as a back door in 12 order to elicit hearsay for the truth of the matter asserted, 1.3 and in particular, this hearsay was elicited or was stated to 14 the witness after he resigned and after the Coach Summit 15 occurred, where this branding ceremony -- which by the way, I 16 don't believe ever occurred, was supposed to occur. 17 So statements that postdate the early June timeline, 18 I think, are not admissible. They did not have an effect on 19 Mr. Vicente in a way that led him to leave NXIVM, and that was 20 the basis of the original ruling by Your Honor. 21 THE COURT: So where are we going here? 22 MR. AGNIFILO: I'm -- in the interest of time, I'm 23 not going to get into everything that he said with every I think it's fair to establish, especially on 24 person.

cross-examination. He testified affirmatively to things on

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## SIDEBAR CONFERENCE

cross-examination. He said he learned later from Kristin
Keeffe this is witness is collecting information from various
sources, and I think that's a fair thing for the jury to know.

Also, this is a witness who had sort of taken it upon himself to sort of, you know, I don't know, be the intrepid do-gooder in connection with bringing down NXIVM, and there's a process to that, and he spoke to a lot of people. I don't need to get into what he said to everybody. I just don't need to do that.

But I think it is important to establish who he had spoken to, because he's not just a mere bystander, he's an active agent, and he -- that's been his testimony.

MR. LESKO: Your Honor, example, Mr. Parlato is a good one. He asked: Was Mr. Parlato paying a source in the legal department at NXIVM, Ms. Keeffe, to show that that actually happened.

He isn't offering that testimony to show that it had an effect on Mr. Vicente. He's trying to establish that there is a sort of boogie men out there, out to get this client, and that's the course of his defense. He's offering this as an --

THE COURT: All right. Let's get there.

MR. AGNIFILO: I'm going to get there.

It's my premise. And I'll do it in the next three questions.

THE COURT: You have only three more questions?

SIDEBAR	CONFERENCE

1244 1 MR. AGNIFILO: Just on this one topic. 2 THE COURT: Well, what else is there? You said an 3 hour, and we're an hour and 15 minutes. 4 MR. AGNIFILO: My cross is still half the length of 5 the direct, so I'm winding down, Judge. I really am. 6 winding down. I'm going to be done this morning certainly. Probably well before the morning break, so I'm winding down. 7 8 But there's a couple of questions I do want to ask, because I believe this witness wanted to make himself 9 10 important, a prime source, you know, for certain things, 11 outflanked Kristin Keeffe, possibly, because Kristin Keeffe 12 was going to say things about him. 1.3 Three questions I'm going to ask to make that point 14 and I'm going to move on. 15 MR. LESKO: Your Honor, Mr. Agnifilo proffered the 16 questions because once they're asked in open court in front of 17 the jury --18 THE COURT: It's done. 19 MR. AGNIFILO: So he advises the FBI that Kristin 20 Keeffe was damaged. And I want to say: You said that to the 21 FBI so that the FBI would listen to you, because Kristin 22 Keeffe told you she was talking to the FBI also. And you 23 wanted to control the narrative. That's it. 24 Those are the questions on Kristin Keeffe, Your

Honor, and I'm stuck with his answer. That's not why I said

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1 it and that is his answer.

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2 MR. LESKO: The problem is the FBI --

3 THE COURT: Could we calm down, please.

4 MR. LESKO: The FBI, I don't believe, told

Mr. Vicente that Kristin Keeffe was talking to the FBI. So

6 Mr. Agnifilo is trying to elicit the statement that

7 Mr. Vicente knew that Kristin Keeffe was talking to the FBI,

which came from Kristin Keeffe.

The truth of that matter asserted is to establish that that actually happened, and that's for the truth, that's not an effect on Mr. Vicente. That's trying to do a back-door attempt over hearsay to prove the truth of the matter asserted, Kristin Keeffe was talking to the FBI. That's what he's trying to do.

MR. AGNIFILO: I don't care whether she was or not. It's not for the truth. He believes she was, and he wanted to be the primary source of information to the FBI and -- and it's what he was thinking.

THE COURT: Well, what exact question are you going to ask?

MR. AGNIFILO: I'm going to say: You had reason to believe that Kristin Keeffe was talking to the FBI. You told the FBI that Kristin Keeffe was damaged. You did that so that the FBI would listen more to you and less to other people.

THE COURT: Well, you can ask the question of: Do

LINDA D. DANELCZYK, RPR, CSR, CCR

Official Court Reporter

THE COURT: They're talking to each other.

MR. AGNIFILO: That's okay. I don't mean --

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1 I just want to make a record here, just for the sake 2 of it. 3 I don't like that. That is even worse. Just stop. 4 These people are out there talking to each other. They're not 5 looking at us. 6 MR. AGNIFILO: Judge, you've been very fair with me 7 throughout the trial. 8 THE COURT: Well, I just got the impression now that 9 you're trying to make a record about bias. 10 MR. AGNIFILO: No, no, no. 11 THE COURT: And I just don't want that. I'm just 12 saying that's the way it looks to the Court. It's not fair. 1.3 MR. AGNIFILO: I don't mean that. 14 THE COURT: Okay. Good. I'm glad to hear that. 15 All right. We're on to the next debate. 16 MR. AGNIFILO: Okay. 17 THE COURT: Which shouldn't be a debate. 18 All I'm saying is I don't want to keep asking these 19 questions -- making these charges to the jury, because at a 20 certain point it looks like you're conducting your direct or 21 bringing in evidence that you don't want to bring in on a case 22 that you would have to bring in order to make your points to 23 the jury about what that evidence will be. 24 I just -- you know, I've allowed this and it's fine,

but there has to be an end point. That's all I'm saying.

- 1 was damaged so that they would be less likely or more likely
- 2 to believe her?
- 3 A I'm sorry. I don't know how to answer that question.
- 4 Q Okay. That's fine.
- 5 You had -- and I'm not going to get into the content
- of these conversations -- you had ongoing conversations with
- 7 Frank Parlato, correct?
- 8 A For some time.
- 9 Q Okay. You and he would speak on a daily basis sometimes
- 10 on a weekly basis, but you spoke very, very often in -- in and
- 11 around June and July of 2017; fair to say?
- 12 A June and July -- yes. I don't know if it was every day,
- 13 but, you know, probably once a week at least.
- 14 Q Do you recall sometimes you would call Frank Parlato four
- 15 or five times in a day?
- 16 A I don't recall, but if you have my phone records, then
- 17 you could probably tell.
- 18 Q But you recall speaking to him regularly about -- about
- 19 these matters; DOS and related matters, correct?
- 20 A Yes.
- 21 Q And you were having fairly regular conversations with
- 22 Catherine Oxenberg during this same period of time, not
- 23 getting into the substance of discussions, you were just
- 24 speaking to her on a regular basis, correct?
- 25 A During that time, yes.

in Clifton Park.

THE COURT: I'm sorry. March of what year?

MR. AGNIFILO: 2018.

25 THE WITNESS: 2018.

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- 21 slaves, right?
- 22 That's what I believed.
- 23 And do you remember writing that these 20 women are all
- 24 talking to each other and comparing notes?
- 25 Α Yes.

10th, 2018, India still had not come around. She was still

And that's because as of this time, that being March the

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- 1 loyal to NXIVM, correct?
- 2 A She -- I believe she was still a true believer.
- 3 Q And what do you mean by true believer is that she chose
- 4 to remain aligned with NXIVM, correct?
- 5 A Little more than that.
- 6 Q Do you recall that on March 27th, 2018, so 17 days after
- 7 you send this email where you reference India, you and a film
- 8 crew went to where India worked and were looking to film her
- 9 at work.
- 10 A I -- we were two blocks away. We were not looking to
- 11 film her at work.
- 12 Q Do you remember being directly across the street from
- where she worked with you and a film crew and a movie camera?
- 14 A Two blocks away, not a movie camera.
- 15 Q What kind of camera?
- 16 A Um, just give me a moment.
- 17 Q Something you put on your shoulder, right?
- 18 A I think it was a Sony FS7.
- 19 Q And that's a big camera that you kind of can hold like
- 20 this, or put on your shoulder-type thing?
- 21 A Yeah, it's like -- it's like a lower-end video camera.
- 22 Q And there was -- there was yourself. There was your
- 23 wife, right?
- 24 A Yes.
- 25 Q There was someone named Clare, right?

Q Were you looking to shoot India?

To not be near the restaurant.

That much I heard.

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And why were you two blocks away from India's restaurant?

My understanding at this point is she was still

know, telling them what she knew.

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- 1 extremely loyal to the entire structure. And my wife went to
- 2 talk -- went to try to talk to her in the restaurant, to ask
- 3 her to please just consider that maybe this entire thing is
- 4 | not harmless, as it's -- as she's suggesting it is.
- I believe that she wasn't there.
- 6 Q How do you know from two blocks away that she wasn't
- 7 there?
- 8 A Well, because of the sequence of events. When my wife
- 9 came back, she said that she wasn't there.
- 10 Q And what's the role of the camera and the film crew in
- 11 | this process?
- 12 A To document the effort.
- 13 Q So what you were trying to do is you were furthering your
- 14 | film project by trying to get India on tape?
- 15 A Not my film project.
- 16 O You were trying to further a film project where you and
- 17 your wife, with a cameraman and someone who's making an HBO
- 18 | film, is trying to further a film project, right?
- 19 A Not to be argumentative, but not an HBO project at that
- 20 point.
- 21 Q What was it then?
- 22 A It was just an independent thing at that point.
- 23 Q And you wanted footage. You wanted footage of India and
- you knew India didn't want to be on tape. You knew that,
- 25 didn't you?

- 1 A Well, I don't think that -- I don't think anyone wanted
- 2 footage of India. I thought the camera stayed there. And I
- 3 believe that my wife went on her own to the restaurant.
- 4 Q You agree with me about that, at one point your wife and
- 5 you and Clare from the film crew and cameraman, were all
- 6 together in a group. At one point in time that's where you
- 7 were all were, right?
- 8 A Yes, two blocks away from Plantmade, I think.
- 9 Q Plantmade?
- 10 A I think it's Plantmade, was the restaurant.
- 11 Q So you -- how did you and the film crew get near Plant
- 12 Made where India was working?
- 13 A Do you mean physically?
- 14 Q Yeah, did you take a taxi together? Did you meet there?
- 15 A I don't -- I mean, I think we walked.
- 16 Q And you knew or you hoped that India would be at work
- 17 that day.
- 18 A Um, well, we hoped that she would be so my wife could
- 19 maybe reason with her.
- 20 Q And the last time you had any contact with India was when
- 21 you were at her house delivering the pies or cakes all those
- 22 months earlier, telling her that this was dangerous and you
- 23 were afraid -- you were afraid and she should be afraid,
- 24 | right? You hadn't had any contact with her in between.
- 25 A No.

the film crew went to Vermont to a film festival, correct?

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Yes.

was involved in good things that are completely irrelevant

from what we are talking about in this case. And for all

those reasons and anything anyone wants to add.

THE COURT: All right. I hear you, yes.

MR. AGNIFILO: Well, first of all, I don't think

it's irrelevant that defendant was involved in good things.

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think it's very relevant that he was involved in good things and I'm surprised that the Department of Justice is afraid to bring out things that are true that defendant did that's good. I think that's absolutely fair ground.

Some of the reason people stayed in NXIVM, they weren't in NXIVM because they were brainwashed. They were in NXIVM because they believed they were doing good things, and one of the things that was good is it did have a way to address the effects of Tourette's and people have the right to notice that, and have the right to stay with organizations that they believe are doing good work.

So to the larger objection, which I have to say, I'm sorry I developed a concern that the government wants to basically cut our legs out from under us so that we can't put in anything that is positive about the defendant, so that they can put in, you know, this is going to be a one-sided case. So I have concerns about that.

The more immediate concern, though, Judge, this man -- and he can describe it any way he wants, is basically going around town with a film crew, exerting pressure on people. It is unwanted pressure.

I don't think India Oxenberg wanted him and a film crew coming to her restaurant after the situation that they had at her house earlier. I don't think the people in Vermont, who are trying to film a movie, screen a movie, want

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him and his film crew traveling to Vermont — from my information is that they tried to gain access with the film crew into the screening of My Tourette's movie.

And Mark Vicente's role as an agent for the destruction of NXIVM, is absolutely relevant and -- and I think I have every right to bring that out. To not let me, Your Honor, is to forestall an entire part of our defense and this didn't just happen.

Mark Vicente, for whatever his own perceptions are, and I think the jury is starting to get a sense of that thought -- thought, genuinely or not genuinely, this was a bad thing that had to be brought up. That's his right, I suppose.

But he did certain things to bring that about and one of the things that he did to bring that about is he went around town and out of town with a film crew. And that is a pressure-filled environment. That's not even like being approached to be interviewed. All of sudden you walk out of It's Your Life and there's a movie camera in your face. That's pressure.

He went to Vermont, not with good intentions, not because he was afraid. What he testified on cross-examination, I think, is implausible, that he went to Vermont with a camera crew because he was afraid for his life. He didn't bring a camera crew because he was afraid for his life. He was prompting -- he was prompting confrontations and

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he wanted to capture them on tape. And that's why he went and he went for a reason.

He brought -- and it came out in direct. I didn't bring it up for the first time. I'm following up on something that he testified to on direct.

This isn't a long topic. I can do this in a few minutes.

MR. LESKO: That's a wonderful argument. I imagine we'll hear it again in summation. This the defendant's case. This is the defendant trying to bootstrap through cross-examination their case in chief. They can put on a case. They can call witnesses about this.

And let's be honest about the Tourette's film. They want to establish through this witness in testimony that is well beyond the scope of the direct examination, that NXIVM cures Tourette's. That's what they want to establish here, and they want to be able to argue that to the jury, as some sort of argument that what Mr. Raniere was doing was good.

We are -- we don't believe the truth of that. We don't believe that NXIVM had any role in curing Tourette's whatsoever. But that's precisely what Mr. Agnifilo is trying to do here.

It's a side show. It's a collateral matter.

It's -- if he wants to try to establish it in his defense case, have at it. But in cross-examination of this witness, I

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1 think it's totally inappropriate.

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I will say, though, if they want -- if I understand their theory. The subject matter of the film is irrelevant.

I don't think we have any objection to -- to cross-examining

Mr. Vicente about attempts to talk to a filmmaker about a film. But what that film was about, we think is irrelevant.

MR. AGNIFILO: Can I just talk about the -- this is the direct examination, question and answer. It's on page 667, starts at line 20: Question, by Mr. Lesko.

"QUESTION: Was there a understanding at NXIVM about claims that programs offered by NXIVM could result in health benefits?"

Answer on direct examination.

"ANSWER: Well, it was talked about. It was generally accepted that, yes, that is what it did. But we were told, you know, don't make those claims. Be very, very careful that you don't suggest that this thing will do that even though, you know, the experience we had, that there was clear evidence that, yes, it actually did do that, you know. Yes. It removed headaches and it could change panic attacks and it could do all kinds of things."

Direct examination.

"It can do all kinds of things that actually did have a physical benefit, but we're instructed not to make that claim."

1 They got into this. They got into this on direct 2 examination. 3 MR. LESKO: He didn't mention Tourette's and there 4 was no discussion about attempt to contact a filmmaker at a 5 film festival in Vermont many, many months after he left 6 NXIVM. We very -- so the remoteness of time and the nature of 7 the content and he did not mention Tourette's whatsoever in his direct examination. 8 9 So, again, I mean, this is a side show. 10 THE COURT: This wasn't about headaches. 11 about Tourette's. 12 MR. AGNIFILO: No, he said "and all kinds of 1.3 things." I can say --14 THE COURT: Well, I mean, yeah. 15 Are you going to claim he could -- he figured out 16 how to cure cancer? 17 MR. AGNIFILO: No, but this is --18 THE COURT: Is this -- my point -- the point is that 19 I'm not going to make light in this trial of the question of 20 whether, you know, your client figured out how to cure 21 Tourette's, which had is serious illness. If you want to make 22 that claim, make it on your case. We're not going into it. 23 Tourette's is out. 24 So if you want to talk about him taking his camera 25 around to confront people or to, you know, that he used this

- 1 CROSS-EXAMINATION (Continued)
- 2 BY MR. AGNIFILO:
- 3 Q Good morning, Mr. Vicente.
- 4 A Good morning.
- 5 Q I have five or ten more minutes of questions and then
- 6 I'll be done.
- 7 A Okay.
- 8 Q When we left off, we were talking about you going to
- 9 Vermont with the film crew. All I want to know is I just want
- 10 to know what you and the folks in the film crew did when you
- 11 got to Vermont. Is it fair to say that the camera was rolling
- 12 while you were there for most of the time?
- 13 A For some of the time, but, I mean, I recall when I went
- 14 to the theater, yes.
- 15 Q Okay. And is it fair to say at one point you and the
- 16 | film crew tried to gain access to a theater?
- 17 A Yes.
- 18 Q And do you recall that the security people at the theater
- 19 were brought into the situation?
- 20 A Yes. We were asked to leave.
- 21 Q And that's because the people at the theater didn't want
- 22 you and the film crew with a running camera to be inside the
- 23 | venue; is that fair to say?
- 24 A I believe it was because the film festival wanted to
- 25 | honor the director's wishes, and the director's wishes were

project ended up -- and I might be using the wrong term, so

work with me -- ended up being taken over by HBO, right?

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Bonnie and Clare, right?

- 1 A I think we traveled back together. I think on the way
- 2 there it was just my wife and I.
- 3 Q So did you have plans on meeting with Clare at -- so this
- 4 is the film festival in Utah, correct?
- 5 A The Sundance Film Festival.
- 6 Q All right. And did you have plans to meet with Clare at
- 7 | the film festival or did you just happen to run into each
- 8 other?
- 9 A Not necessarily. We tend to go every year, and she was
- 10 there that year as well.
- 11 Q And you moved back to LA, you, Bonnie, and Clare,
- 12 correct?
- 13 A I think so -- I -- I think we flew back together. We
- 14 | actually walked past in an airport.
- 15 Q All right. And you were on the plane together?
- 16 A Again, I -- I know -- I know my wife and I were
- definitely on the plane, but I'm not sure exactly whether
- 18 Clare was on the plane.
- 19 Q Now, what is your -- do you have any book deals as we sit
- 20 here today?
- 21 A I do not.
- 22 Q Have you spoken to anybody about having a book deal?
- 23 A I did in January 2018 and I decided not to.
- 24 Q What, if any, movie deals do you have, other than the
- 25 thing that's now an HBO project?

- 1 A I have nothing.
- 2 Q Just the HBO project?
- 3 A Yes.
- 4 Q And what is your current involvement in the HBO project?
- 5 A Subject.
- 6 Q Subject meaning you're -- you're expected to be in the
- 7 movie?
- 8 A I think so, yes.
- 9 Q And is it fair to say you expect to play the role of
- 10 someone who is trying to do good things in the movie, positive
- 11 | things and official things?
- 12 A I don't expect to play a role. I -- I've done what I've
- done. Some of that has been captured.
- 14 Q You feel you've done important work in -- I want to pick
- 15 the exact right words.
- 16 You feel that you've done the right thing in coming
- 17 forward with the situation with NXIVM, correct?
- 18 A One more time.
- 19 Q You feel that you have done the right thing in coming
- 20 forward with the situation, as you understand it to be
- 21 concerning NXIVM, correct?
- 22 A Yes.
- 23 Q And that is going to be depicted in the film, correct?
- 24 A Well, I think my sense is many things might be depicted.
- 25 Maybe that's part of it. You know, I don't know for sure.

- 1 Q But you know you're going to be -- you're on camera. I
- 2 | mean, you're not -- you're a filmmaker by trade, right?
- 3 A Yes.
- 4 Q And in this capacity you're no longer a filmmaker, you're
- 5 on the other side of the lens, as they say, correct?
- 6 A Yes.
- 7 Q You're sort of an active agent in the movie. You're not
- 8 | an actor for this, it's not fiction. But you're in the movie
- 9 as a figure, as Mark Vicente, right?
- 10 A Depending on what they choose. I'm in -- I'm in there if
- 11 that they do.
- 12 Q Do you have any input into that?
- 13 A I don't.
- 14 Q So you've relinquished you said in the beginning you had
- 15 | a certain amount of control?
- 16 A Well, there was an understanding well, maybe I could be
- 17 involved and that changed.
- 18 Q And is that partly because of your role in this trial?
- 19 A No. It's -- yes, I mean -- you can't -- this is my
- 20 understanding, you -- you can't make a -- a documentary where
- 21 | you have a subject who's involved in something that's also
- 22 making creative decisions. It's basically -- journalism.
- 23 Q Okay. Is it fair to say that throughout your life,
- 24 you've been looking to do important things; is that fair to
- 25 say?

- 1 A I would say that.
- 2 Q And when you joined Ramtha, you wanted to do important
- 3 things there, correct?
- 4 A Yes.
- 5 Q And when you joined NXIVM, you wanted to do important
- 6 things there, right?
- 7 A Yes.
- 8 Q Now, we went through finances yesterday. Do you recall
- 9 in 2017 you only made about \$14,000 in income from NXIVM?
- 10 A (No audible response.)
- 11 Q Yes, I know it's only a partial year because you left in
- 12 May.
- 13 A I don't recall that.
- 14 Q Do you think you made more than that?
- 15 A I thought I did.
- 16 Q What did you think you made?
- 17 A Not as -- not as much as previous years, but -- oh, my
- 18 tax year is October to October. My corporate tax year is
- 19 October to October, so that would be -- yeah, my -- my -- that
- 20 corporation wasn't a calendar year.
- 21 O You said a few times on direct and cross-examination --
- 22 let me ask you a more specific question.
- 23 When I was asking about Ramtha --
- 24 A Uh-huh.
- 25 Q -- and I asked if you really thought that this woman was

- 1 You were asked many questions about this HBO
- 2 documentary film by defense counsel.
- 3 A Yes.
- 4 O So --
- 5 THE COURT: Keep your voice up, please.
- THE WITNESS: Yes, Your Honor.
- 7 Q And does that documentary film project involve the
- 8 interview of many people?
- 9 A I don't know all the people involved. I'm assuming some
- 10 people for sure.
- 11 Q Do you know if Mr. Agnifilo's been interviewed?
- 12 A I've heard a rumor. I can't confirm it, but I heard a
- 13 rumor.
- 14 Q And what did -- you're a documentary filmmaker, correct?
- 15 A I'm a filmmaker, and at times I've made documentaries.
- 16 Q And some of the documentaries that you've made involve
- 17 injustice?
- 18 A Yes. And actually some of the -- some of the narrative
- 19 | films that I was involved in, in Africa were to do with
- 20 apartheid stories about Nelson Mandela. So it's been a strong
- 21 theme in my life.
- 22 Q How do you view this HBO documentary of NXIVM?
- 23 A My hope is that it gives people some dignity coming out.
- 24 I think that this is a very difficult situation for a great
- 25 many people. One of my deep concerns about all the press has

VICENTE - REDIRECT - MR. LESKO 1282 1 been that honestly, I'm tired of seeing, you know, my name and 2. the word "sex cult next" to it. And I think that that's the 3 case for many of the women as well. 4 MR. AGNIFILO: I'm going to object to this, 5 Your Honor. 6 THE COURT: Overruled. 7 Let's move on. 8 BY MR. LESKO: 9 So let's talk a bit -- you were asked many, many 10 questions about contacting the FBI in May of 2017 and 11 conferences with Sarah? 12 Yes. 1.3 Among others? 14 Yes. 15 Why did you contact the FBI in May of 2017? 16 I believed that what I was gathering information about 17 involved illegal activities. I believed that the NXIVM and 18 all the organizations were, in essence, a cover for something 19 far more nefarious, and I began approaching law enforcement, 20 A, to try to help these women that I believed were in a bad 21 situation. 22 And then, B, to hopefully try to uncover, you know, 23 what was going on, on a larger scale. So I approached many 24 more people than just the FBI. 25 And as part of your attempts to contact the FBI, did you

phone conversations with Sarah. Do you have an explanation as

I think Mr. Agnifilo suggested that on one day he had 18

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- 1 to why you may have had that much contact with Sarah?
- 2 A Because I had to be very clear on what I told the FBI.
- 3 My thought was that they didn't want, you know, just hysteria.
- 4 They wanted some clear details.
- 5 Q Did Sarah and Sally, in fact, meet with the FBI?
- 6 A They did.
- 7 Q Now, Mr. Agnifilo asked you about a conversation with
- 8 India. I believe it was at the event where you brought the
- 9 cake or pies?
- 10 A Yes.
- 11 Q And he was very precise. In fact, it seemed like he
- 12 quoted you and observed your tone. How would he know that?
- 13 A I imagine --
- 14 MR. AGNIFILO: I'm going object, Your Honor.
- THE COURT: To the answer?
- 16 MR. AGNIFILO: No. How would I know that. I'm not
- 17 sure...
- 18 THE COURT: Sustained.
- 19 Q Do you have an understanding as to how defense counsel
- 20 would know exactly what you said when you had this
- 21 conversation with India?
- 22 A My understanding is that she called Raniere or her master
- 23 | straightaway to tell them what happened.
- 24 Q So this photograph that you were shown --
- MR. LESKO: Your Honor, if we could just show this

- 8 A Yes.
- 9 Q And where does it appear to be taken from?
- 10 A From inside some kind of structure.
- 11 Q Is that through a window?
- 12 A It -- I think so. I also see a fence. I'm not sure if
- 13 it's the metal embedded in the window or if it's just a fence.
- 14 Q It's across the street from you, correct?
- 15 A Yes.
- 16 Q And do you know who took that photograph?
- 17 A I don't. Mr. Agnifilo suggested that it was India.
- 18 Q So you were asked if you thought you were being spied
- 19 upon. You were being spied upon, right?
- 20 A I believe so.
- 21 Q I mean, that's what this photograph shows; is that
- 22 correct?
- 23 A Yes.
- 24 Q Now, you were asked questions by defense counsel about
- 25 this moment in the summer of 2016 where your wife had a moment

- 1 of enlightenment. Do you remember that?
- 2 A Yes. I remember him saying that, yes.
- 3 Q And he asked you many questions about her interactions
- 4 | with the defendant about the enlightenment?
- 5 A Yes.
- 6 Q Do you recall discussions between your wife and the
- 7 defendant about a tree?
- 8 A Yes.
- 9 Q Explain the tree discussion.
- 10 A My understanding was that they took a walk one night very
- 11 late, like early morning, and he was telling her that her
- 12 issue was her boundaries, she had too many boundaries and too
- 13 many concerns about things. And he wanted her to run towards
- 14 a tree and run into it.
- MR. AGNIFILO: Your Honor, I object and ask that it
- 16 be stricken.
- 17 THE COURT: Let's see where it goes.
- 18 Q Did the discussion involve a puddle?
- 19 A Yes.
- 20 0 What was said?
- 21 A My understanding was that he said to her to lick the
- 22 | puddle as part of this, you know, overcoming boundaries and
- 23 getting past, you know, being hung up about stuff.
- 24 Q And was this discussion in the context of the defendant
- 25 mentoring your wife?

- 1 A Yes.
- 2 Q You talked -- you were asked questions about Ramtha,
- 3 right?
- 4 A Yes.
- 5 Q Did the defendant know about your involvement with
- 6 Ramtha?
- 7 A He did. He -- when -- when we first met, he spent an
- 8 inordinate amount of time teasing me about it and then told me
- 9 that he needed to deprogram me from my mystical beliefs.
- 10 Q Did Nancy Salzman know about your involvement with
- 11 Ramtha?
- 12 A She did. She was also part of the team to deprogram me.
- 13 Q So you were asked a number of questions about your trips
- 14 to Fiji?
- 15 A Yes.
- 16 Q And do you recall one of those trips involving a VIP
- 17 intensive?
- 18 A Yes. I think it was the second one.
- 19 Q And what was the subject matter of that intensive?
- 20 A I believe it was the XOSO program and the reference
- 21 program were being taught to some VIPs.
- 22 Q And if you could, describe the type of VIPs that attended
- 23 that program.
- 24 A Exceptionally wealthy. I don't recall the exact
- families, but they were very prestigious families from Europe.

- 1 | Q Any members of royalty?
- 2 A Yes. Yes. I think one of them was in the, like, royalty
- 3 lineage of some kind.
- 4 Q Did any of those participants complain about the program?
- 5 A They did. They complained about the food. They
- 6 complained about the cost, and they said that the -- the
- 7 | program itself wasn't worth the money. They complained about
- 8 | the accommodations. There were issues with the accommodations
- 9 as well.
- 10 Q At some point were you asked to do anything regarding
- 11 | those complaints?
- 12 A Yes. Clare Bronfman called me and said, Please ask the
- 13 specific person to leave. And being the owner of this
- 14 | facility, I said okay. So I went to talk to the person and
- asked them to leave, and it blew up pretty badly.
- 16 Q What do you mean?
- 17 A They began, you know, screaming at me and called me, you
- 18 know, cold and callous and unfeeling, and there was a lot of
- 19 fallout for a long time.
- 20 Q Was anyone removed?
- 21 A Yes. One person, I believe, left the next day or maybe
- 22 actually two, I'm sorry, left the next day.
- 23 Q Did you have an altercation with Nancy Salzman at this
- 24 same -- in connection with this same program?
- 25 A Not that -- or we did have an altercation in Fiji, but it

- 1 | wasn't at that time. I think it was a different trip.
- 2 Q Another trip?
- 3 A Uh-huh.
- 4 Q So discuss the altercation you had with Nancy Salzman.
- 5 A It was something at the airport. She -- for some reason
- 6 I can't figure out, she suddenly felt -- seemed insecure about
- 7 something and in the sort of terminal area, you know, where
- 8 you put your bags in, she just began screaming at me saying
- 9 basically, you know, you're the head of Society of Protectors.
- 10 What kind of man are you? You can't even take care of basic
- 11 things.
- 12 I'm struggling with this-- it was a whole diatribe
- and then eventually a number of her staff, you know, went to
- 14 her and calmed her down.
- 15 Q Okay. I'm showing you what has been admitted as
- 16 Government -- I mean, pardon me, Defendant's 328. This is, I
- 17 believe, the third page --
- 18 THE COURT: This is admitted?
- MR. LESKO: This is admitted, yes.
- 20 Q This is the third page. Do you recognize the people in
- 21 that photograph?
- 22 A I do.
- 23 Q Any of them DOS slaves?
- 24 A Yes.
- 25 Q Could you identify -- is there one or more -- how many

## Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 98 of 275 PageID #: 8487 VICENTE - REDIRECT - MR. LESKO 1290 1 DOS slaves? 2 I think there were five. 3 Could you draw circles around the DOS slaves and identify 4 them, please. 5 (Witness complies.) I'm sorry, fat circle. 6 I'll correct it. You can go a little bigger. 7 Go ahead. 8 Α Alejandra. 9 Q Alejandra. 10 Okay. And that's the far right photograph in a 11 black bathing suit? 12 Yes. 13 Okay. Q 14 Sahajo. Sahaka [phonetic]? 15 Q 16 Α Sahajo. 17 Q Sahajo. 18 And that's immediately to the left of the woman in 19 the black bathing suit? 20 Α Yes. 21 Q Okay. 22 Danielle. 23 She's basically the only person in the front row of the 24 photograph? 25 Correct.

- 21 Okay. You got in trouble as a result of that film; isn't
- 22 that right?
- 23 Can you be more specific? I got in trouble a few --
- 24 You were accused --
- 25 MR. AGNIFILO: Your Honor, leading.

Okay. You were asked a number of questions about

- 1 | feedback. Do you remember those on cross-examination?
- 2 A Yes.
- 3 Q And I think you testified that, correct me if I'm wrong,
- 4 NXIVM members would give themselves feedback numbers on
- 5 | certain issues; is that right?
- 6 A At the very beginning when you came in as a white, you
- 7 had a number. I don't recall if there would be numbers once
- 8 you were of rank.
- 9 Q So do you have a different perspective now on feedback in
- 10 NXIVM as opposed to this perspective you had when you were
- 11 involved in NXIVM?
- 12 A I do.
- 13 Q What is your perspective on feedback now?
- 14 A Well, the whole system, I think, is designed to make you
- drop your boundaries. Like in other words, if you're told
- 16 something, instead of like fighting it, you know, like a
- 17 normal person would if they think something is, you know, not
- 18 just, to basically take the hit. So I feel like the whole
- 19 system was designed to basically if you're truly involved, you
- 20 | will take any hit that comes to you, and you won't complain
- 21 and you will listen to it. In essence, debilitating your
- 22 ability to have a sense of self and a sense of identity, a
- 23 sense of agency about, you know, what you want to do in your
- 24 life.
- 25 Q Did the defendant ever give feedback?

And there was a certain kind of pressure to do these

things. It would look really bad as a member of a high

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THE WITNESS: Fancy name for a nanny.

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- And did MDSs or nannies, in essence, run the program?
- 23 They would be the arms and legs of the program.
- 24 Loreta Garza ran the program and ran the company under the 25 mentorship of Raniere.

- 1 Q All right. And I think you explained that part of the
- 2 program involved teaching the children languages; is that
- 3 correct?
- 4 A Yes. And also, you know, playing, you know, music from
- 5 that country, eating food from that country, you know, being
- 6 surrounded by that culture as much as possible.
- 7 Q Did children participate in Rainbow Cultural Gardens in
- 8 lieu of going to school?
- 9 A That's my understanding.
- 10 Q So they didn't go to school, they went to Rainbow Culture
- 11 Gardens?
- 12 A That is my understanding.
- 13 Q Okay. And the MDSs were the arms and legs, they were the
- 14 daily --
- 15 A Yes. They were the people that came and spent a certain
- 16 number of hours per day with the children.
- 17 Q And some of these MDSs were girls from the polygamous
- 18 LeBaron community, the Mormons who left Utah who went to
- 19 Mexico?
- 20 A Yes.
- 21 Q Did any of these MDSs -- do you know if they were
- 22 certified or qualified to teach children?
- 23 A They were not.
- 24 Q And were they certified or qualified to teach languages?
- 25 A They were not.

- 8 Q You were asked questions about and we played the
- 9 audiotape where you're discussing SOP with the defendant and
- 10 others. Do you remember that?
- 11 A Yes.
- 12 Q And you discussed collateral?
- 13 A Yes.
- 14 Q The collateral that was used in SOP, was it the money put
- 15 up in exchange for enrollments; is that how that was used?
- 16 A That is correct, yes.
- 17 Q And I think you mentioned the release of collateral in
- 18 SOP. Was it the release of the money, is that what you were
- 19 referring to?
- 20 A Yes. In essence, if you didn't do the thing you said you
- 21 | would do, the money that you paid into the system would now be
- 22 taken. You would not be able to get it back.
- 23 Q You indicated on cross-examination that you wore told SOP
- 24 was a force for good. Has your understanding of SOP changed
- 25 since then?

VICENTE - REDIRECT - MR. LESKO

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- 1 A Yes.
- 2 Q Could you explain?
- 3 A Well, I think there's a number of things. I think it's
- 4 more of a -- a force of kind of enforcement I think, that
- 5 the -- the men were abusive to the women. I think that it
- 6 was -- even though it was codified into an educational thing
- 7 and they were just following orders, you know, I still think
- 8 | it wasn't good for the women.
- 9 I also think it made the men -- because the men were
- 10 constantly in some ways teased for not being, you know, man
- 11 enough. You know, Raniere was seen as the ultimate man and
- 12 then we were, in essence, not man enough. So there was a
- 13 certain ridiculing of the men as well.
- 14 And then the constant readiness thing, you know,
- 15 keep everyone on standby for whatever. To me it's almost like
- 16 it was programming people to just be ready for whatever, you
- 17 know. And because so often there was nothing to do except
- 18 just answer ready, the few times that there was actually a
- 19 mission, you know, the guys were very excited about doing it.
- 20 And my concern later was, you know, what could people be asked
- 21 to do?

- 22 Q I'm going show you what has been admitted as Government's
- 23 1797R. And I'm going to position it just like Mr. Agnifilo
- 24 did when he showed it to you, the top half.
  - Do you remember looking at this? This is your memo.

understanding was that they had asked to see NXIVM's materials

- 1 from a particular year --
- 2 Q Let me stop you. That's your understanding of what the
- 3 actual case, but you said a patent case?
- 4 A Oh, it was more -- no. To be precise, what I understood
- 5 at that point is that there was a case going on and that the
- 6 patent -- I was told the patent was at risk because of this
- 7 case. That's what I understood.
- 8 Q So you knew there was litigation involved?
- 9 A Yes.
- 10 Q So you recall hearing in the SOP audiotape the defendant
- 11 saying he would have absolute say over SOP?
- 12 A Yes.
- 13 Q Did he, in fact, have absolute say over SOP?
- 14 A He did.
- 15 Q You talked a bit about many NXIVM programs, Jness, SOP,
- 16 SOP Complaint. Do you have an understanding now regarding how
- 17 those programs related to DOS?
- 18 A My sense now is that they were almost like the hunting
- 19 grounds for DOS, and they would be -- a lot of the techniques
- 20 and training that occurred in those trainings would then be
- 21 intended to used in DOS. And it was -- it was fostering a
- 22 kind of deference and following orders. That's my sense of
- 23 how it led to DOS.
- 24 Q Okay.
- 25 You were asked questions about the thousands of

Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 109 of 275 PageID #:								
	VIC	8498 ENTE - REDIRECT - 1	MR. LESKO	1301				
1	hours of videotaping that you led or conducted when you were							
2	involved with NXIVM. Do you remember that?							
3	A Yes.							
4	Q Pretty much everything, right? It was a videotape?							
5	A Pretty much everything.							
6	Q Forums?							
7	A Yes.							
8	Q V weeks?							
9	A Conversations,	executive board c	onversations betw	veen				
10	Raniere and notable people that came into town.							
11	Q Were you ever	asked to videotape	the defendant ha	aving sex				
12	with DOS slaves?							
13	MR. AGNIF	ILO: I object to	the form of the					
14	question.							
15	THE COURT	: Sustained.						
16	Q Did you ever v	ideotape the defen	dant having sex w	with DOS				
17	slaves?							
18	MR. AGNIF	ILO: I object to	the question, Jud	dge.				
19	THE COURT	: Overruled.						
20	You may a	nswer.						
21	A No.							
22	Q So you were as:	ked many questions	about Sarah. We	ere you				
23	close with Sarah?							
24	A Yes.							
25	Q I'm going show	you what's been a	dmitted as					

Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 110 of 275 PageID #:							
	<mark>8499</mark> VICENTE - REDIRECT - MR. LESKO 1302						
1	Defense Exhibit 302.						
2	Remind, me, where were you in that photograph?						
3	A I'm holding Sarah and I have a drink in my left hand.						
4	I'm in the middle.						
5	Q Where is that location, where are you there?						
6	A This is an after-party for a musical that was done in						
7	Mexico City. I was a co-writer on the musical. And this is a						
8	picture with not the abuser, actually, just some this is						
9	basically ESP NXIVM high ranks that attended the evening and						
10	this was the after-party.						
11	Q Okay. Everybody's smiling?						
12	A I'm sorry?						
13	Q Is everybody smiling?						
14	A Yes.						
15	Q Is everybody happy?						
16	A Yes.						
17	Q Sarah's in the blue dress?						
18	A Yes.						
19	Q Was Sarah smiling like that when she told you she was						
20	branded?						
21	MR. AGNIFILO: Object to the form of the question,						
22	Judge.						
23	THE COURT: Sustained.						
24	Q Was Sarah happy when she told you she was branded?						
25	MR. AGNIFILO: Objection.						

## VICENTE - RECROSS - MR. AGNIFILO 1303 1 THE COURT: You may answer. 2 She was not. She was -- her voice was shaking and she 3 was crying intermittently while she was talking to me. 4 MR. LESKO: No further questions, Your Honor. 5 MR. AGNIFILO: I have a couple, not too many. 6 THE COURT: All right. Recross. 7 RECROSS-EXAMINATION 8 BY MR. AGNIFILO: 9 Mr. Vicente, I just have a few questions for you. 10 Yes, sir. 11 We're going to go to 1397 that we just looked at --12 MR. AGNIFILO: And zoom in on -- it's in evidence so 13 the jury can see it. 14 And so we were looking at the part that makes reference 15 to Keith, and it says the duplication of tapes Keith has asked 16 me for, right? 17 That's what it says, yes. 18 It's not the editing, the changes, the modification of 19 tapes, the duplication the copying of tapes that -- that's 20 what this says, the duplication of tapes Keith has asked me 21 for. That's all it says, right? 22 That's what it says. 23 Now, this is called Twilight Post, the project that never 24 seemed to end, right? 25 Yes.

VICENTE - RECROSS - MR. AGNIFILO

- 1 Q I think yesterday you were talking about -- Keith wanted
- 2 all of his words and things to be memorialized and that
- 3 project started in 2006. You talked about yesterday, right?
- 4 A Yes.
- 5 Q Do you recall the -- you talked about an event that
- 6 happened in Fiji, someone wasn't happy and was asked to leave
- 7 the island, right?
- 8 A Yes.
- 9 Q Do you know if Clare paid that person in full?
- 10 A I don't -- I don't understand.
- 11 Q Yeah. The person who left the island, that person, do
- 12 you know if Clare Bronfman paid that person back in full
- 13 because the person didn't stay for the whole duration of the
- 14 | trip in Fiji?
- 15 A I wasn't privy to that kind of information.
- 16 O And do you recall the problem was that this person was
- 17 not civil to the staff who was taking care of her and others,
- 18 at Fiji?
- 19 A My recollection of the problem was that she felt that
- 20 this material was not original and she wasn't sure why she
- 21 was, you know, listening to something that she already heard.
- 22 Q And you don't recall any problems with this person being
- 23 rude to the people taking care of everyone in these
- 24 accommodations at Fiji?
- 25 A It is possible.

Case 1:	8-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 114 of 275 PageID #:				
	8503 PROCEEDINGS 1306				
1	Herbits. We'll need a moment to go get him.				
2	THE COURT: Sure.				
3	(Pause in proceedings.)				
4	MS. PENZA: I'm sorry, Your Honor, while we have a				
5	moment, may I introduce into evidence				
6	Government's Exhibit 1002A? This is the exhibit that is to				
7	replace Government's Exhibit 1002 that had previously been				
8	entered into evidence.				
9	MR. AGNIFILO: No objection.				
10	THE COURT: All right. Government's Exhibit 1002A				
11	is received in evidence.				
12	You may call your witness.				
13	(Government Exhibit 1002A, was received in				
14	evidence.)				
15	MR. LESKO: Thank you, Your Honor.				
16	THE COURT: Call your witness.				
17	MS. PENZA: The Government calls Stephen Herbits to				
18	the stand.				
19	(Witness takes the witness stand.)				
20	STEPHEN HERBITS, called as a witness, having been first duly				
21	sworn/affirmed, was examined and testified as follows:				
22	THE COURTROOM DEPUTY: Please have a seat.				
23	THE WITNESS: All right.				
24	THE COURTROOM DEPUTY: Please state and spell your				
25	full name for the record.				

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Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 115 of 275 PageID #:
                        HERBITS - DIRECT - MR. LESKO
                                                                1307
  1
                 THE WITNESS: Stephen Herbits, S-T-E-P-H-E-N;
  2
       Herbits, H-E-R-B-I-T-S.
  3
                 THE COURT: All right. You may inquire.
  4
                 MR. LESKO: Thank you, Your Honor.
  5
       DIRECT EXAMINATION
  6
       BY MR. LESKO:
  7
            Good afternoon, Mr. Herbits.
  8
            Good afternoon.
  9
            Can you see me?
 10
       Α
            Yes.
 11
            Okay. Good afternoon.
 12
                 How old are you, Mr. Herbits?
 1.3
            Seventy-seven.
 14
            Mr. Herbits, could you briefly describe your career up
 15
       until April 1977?
 16
            After college -- graduated in '64. I did some graduate
 17
      work and studied some graduate work in insurance, that was my
 18
       father's business. I anticipated going back to work with him,
 19
      but I got a little bit sidetracked and into politics and
 20
       policy and I ended up in Washington for 11 years from '67 to
       '77.
 21
 22
                 During that period I had a number of different jobs.
 23
       I worked for the staff for House of Representatives,
 24
       United States Senate, the Pentagon on multiple occasions, and
 25
       a special trade representative because during the period of
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HERBITS - DIRECT - MR. LESKO

1308

time, I also had a law degree and I wanted to learn something about law that I could make some money from. And a short stint in the White House after Nixon resigned and Ford became president to help them with the transaction to a new presidency. And then I left to go for trade law. Did you have a role in the old volunteer Army? One of my first assignments in the House of Representatives in January of '67 was to look at the draft problem. I researched that, spent a lot of time in the Pentagon and wrote a paper for the members of Congress that I was working for as a group that I didn't think the draft was necessary. And there were real problems with the draft because it was getting very selective and they were very unbalanced and there's lot of questionable behavior by draft boards of. So the paper, I was sent back to do more research which I came back, the document was translated into a paperback book which five members of Congress signed which said how to end the draft. The case was volunteer force, Nixon endorsed it, got elected, created a commission on the -- to study it, I was put on the commission as the youngest member of the commission. The commission reported back to the President that it was something he should proceed to do. It was then assigned to the Pentagon to draft a detail plan. That took a year and

18 essentially his chief of staff for the last year or so of the

20 And this was in the 1970s?

Ford administration.

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That was 1970, the beginning of '76 through the election of January of '77.

In April 1977 were you interviewed by someone for a job?

In April of 1970 -- yes, I was interviewed by actually

several corporations, but the primary one was Edgar Bronfman

- 1 of Seagram's.
- 2 Q And who was Edgar Bronfman?
- 3 A Edgar Bronfman was the chairman and CEO of the
- 4 | Seagram's Corporation and his father had founded the company
- 5 | who had died in 1971, Edgar in '77 was running the company.
- 6 And his family were the controlling shareholders of a public
- 7 | company. They had control over it by the amount of shares
- 8 they had.
- 9 Q And what sort of business was Seagram's in?
- 10 A At that time it was the largest spirits and wine company
- 11 | in the world. It also had an investment in a small company
- 12 | called Texas Pacific Oil and Gas which was a company that
- 13 searched for oil and gas. And it -- which was sold to Sunoco
- 14 | in -- in the year 1980.
- 15 Q Did Seagram's own other companies?
- 16 A They had a lot of subsidiaries around the world. But the
- money that was earned from the sale was invested ultimately in
- 18 DuPont and they owned 25 percent of DuPont for their duration.
- 19 That was a self-imposed limit by Edgar, so the company would
- 20 still be independent. But they would have some input.
- 21 Q Did Seagram's own Universal Studios?
- 22 A They bought Universal in the early '90s and it also
- 23 | brought Tropicana at one point at the end of the '80s and at
- 24 some point, yes, they owned those companies but they came and
- went.

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HERBITS - DIRECT - MR. LESKO

1313

trip he went abroad. When he was asked by foreign ministers or asked by heads of state or government in a meeting in which he was discusses World Jewish Congress business he would say, I do not mix my business -- personal business with my Jewish Congress business, but my associate here who is the vice president of the company will be happy to talk to your people about it and then we can confirm when we get back to New York, so I was always with him. Sometimes it was reverse, sometimes he was there on company business and they would want to raise Jewish Congress business and he would say, you need to talk to my associate because I don't mix my business. What was World Jewish Congress? World Jewish Congress was created in 1930s out of Europe because of the beginnings of the holocaust and it was to inform the world of what was going on and to try to save the Jews. It consisted -- it grew into an organization where each country has a group that relates to the Jewish people -- to the organizations within that country. America, for instance, has roughly 32 groups and some countries just one group and some countries supervise others. Those people become regional group and the regions elect the president. So it is an international organization? International organization. Most of the work is done internationally. Because there were so many Jewish

1314

1 organizations in the States he didn't have to spend a lot of

2 | time, although he did see Presidents from time to time on what

3 he was doing abroad.

Q So where did you go to work after you retired from

5 Seagram's?

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6 A I retired in part because I was tired and part because I

7 | worked very hard I said all right I'll work hard now and then

8 I'll have the second half of my life more leisurely. That

didn't turn out very successfully, but I did some consulting,

various odds and ends. Edgar asked me to come back and work

with him part time on -- he had been appointed by the

12 President as the head of the U.S. Advisory -- Presidential

13 Advisory Committee on Jewish assets in the United States.

This was a period of time when the whole asset question banks

had and that insurance companies had. People who were killed

16 in the holocaust and banks didn't release the money because

17 there was no birth certificate, things like that.

So he appointed one to see what assets were in the United States and I was a liaison between him because he was

very busy and the commission staff, worked with them very

21 closely to get through that year, year and a half assignment.

Q Did you also go back to the Pentagon?

23 A I went back to the Pentagon in -- I'd been in

24 | the Pentagon a couple of times with Seagram's on very short

assignments on a very specific thing that was needed sometimes

1315

1 for four or six weeks with I did it a as dollar a year man 2 because Edgar kept me on the payroll, it's just easier. And 3 in 2001 I went back to do Rumsfeld's transition as Secretary 4 of Defense for the second time. And he asked me to stay in 5 the same job I had for him in the '70s to which I said I 6 couldn't and he said why? I said I'm too old and he said I'm 7 ten years older than you and I said, I -- you need somebody 8 younger. I can't work for you with the strength that you need 9 because he was a very, very, very tough hardworking 10 boss. 11 So I did the transition for him, I left in May and I 12 got a call the day after 911 and he said I want you back here 1.3 and I said when? At first he began by saying we're at war, I 14 said I know this. And he said I want you back here and I said 15

when. He said how about tomorrow. I said how about Monday, so I can shutdown my life and I went back to Washington. I stayed there full time for five months and then came back for a project in the service for the next two year.

THE COURT: This was after the Pentagon?

THE WITNESS: The Pentagon. It was all under

Rumsfeld.

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22 BY MR. LESKO:

23 So at some point, did Edgar Bronfman ask you to work for

24 him again?

25 We stayed very friendly all during that period. So

at that time, assigned his -- his head of charity bureau to

take a closer look. She took a closer look and we then

24

24 A Yes.

25

Q And what was Edgar's role?

- 1 A He was the president up until June of '77 [sic] when he
- 2 retired. I continued to do the job at the request of the new
- 3 president to handle his transition for three months while he
- 4 did what he wanted to do.
- 5 Q So Edgar Bronfman was the president of the
- 6 World Jewish Congress in the June of 2007?
- 7 A Yes, that's right. He had been president since '79 on a
- 8 temporary basis because the previous president had just moved
- 9 into Carter's Cabinet, and Edgar was then elected in his own
- 10 | right in '81.
- 11 Q And the person you replaced, was that person named Israel
- 12 Singer?
- 13 A Yes.
- 14 Q Did you report directly to Edgar Bronfman at the
- World Jewish Congress?
- 16 A Yes.
- 17 Q And you mentioned that you left the World Jewish Congress
- 18 a few months after Edgar Bronfman left in June of 2007?
- 19 A He left in June, I left in September.
- 20 Q Could you explain -- you mentioned you traveled with
- 21 Edgar Bronfman. Could you just describe some of your travel
- 22 with Edgar Bronfman?
- 23 A During his very active years he was seeing heads of
- 24 state, heads of government, foreign ministers, went to Russia
- on multiple occasions, China on multiple occasions, the

- 1 Europeans constantly, and basically in group meetings with
- 2 World Jewish Congress around the world, sometimes with
- 3 one-on-one meetings or one-on-one with staff on both sides.
- And you accompanied him on these trips?
- 5 A Virtually all of them when he left the country except if
- 6 it was a vacation of his.
- 7 Q Is Edgar Bronfman deceased?
- 8 A Yes.
- 9 Q When?
- 10 A 2013.
- 11 Q And during the time period that you worked for and knew
- 12 Edgar Bronfman, did you establish a relationship with him?
- 13 A Yes, very close relationship. It -- my hours I probably
- 14 | spent more time with him than anyone but his wife.
- 15 Q How would you characterize that relationship?
- 16 A I tried the maintain a professional relationship with
- 17 him. I did not do social things, purely social. I did social
- 18 things with his functions as a diplomat and as a businessman,
- 19 but I did not -- I tried to not to get involved in family
- 20 issues.
- 21 Q Did you and Edgar Bronfman trust each other?
- 22 A I think more than anybody that I've ever trusted and I
- 23 think that may have been the way he felt, too, but I -- I only
- 24 because the feeling I got from him. That's my judgment.
- 25 MR. LESKO: Your Honor, I'm about the move to

Case 1:7	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 129 of 275 PageID #:			
	<mark>8518</mark> HERBITS - DIRECT - MR. LESKO 1321			
1	AFTERNOON SESSION			
2	(Time noted: 2:00 p.m.)			
3	(In open court; Jury not present.)			
4	THE COURTS Latin bring in the witness places			
5	THE COURT: Let's bring in the witness, please.			
6	(Whereupon, the witness resumes the stand.)			
7	How much more for this witness?			
8	MR. LESKO: Half hour or so.			
9	THE COURT: And cross?			
10	MR. AGNIFILO: I don't see a long cross at all.			
11	THE COURT: And we're ready for the next witness			
12	after that?			
13	MS. PENZA: We are, your Honor.			
14	THE COURT: Let's bring in the jury.			
15	(Jury enters the courtroom.)			
16	THE COURT: Please be seated.			
17	Mr. Lesko, you may continue your examination of the			
18	witness.			
19	I remind the witness he's still under oath.			
20	THE WITNESS: Okay.			
21	DIRECT EXAMINATION (Continued)			
22	BY MR. LESKO:			
23	Q Good afternoon. Let's spend a few moments to talk about			
24	Edgar Bronfman's family, okay? How many wives did			
25	Mr. Bronfman have?			

HERBITS - DIRECT - MR. LESKO

- 1 A He was married five times. The second marriage was
- 2 annulled. His third marriage and the fourth marriage was the
- 3 same person as the third marriage. And his wife when he died
- 4 is five.
- 5 Q Five times, four wives basically?
- 6 A Yes.
- 7 Q How many children did Mr. Bronfman have?
- 8 A From the first wife he had five, four boys and a girl.
- 9 From the third and fourth wife he had two daughters.
- 10 Q What were his two youngest daughter's named?
- 11 A Sarah and Clare.
- 12 Q Who was their mother?
- 13 A Well, the name I knew her as was Georgiana, but I think
- 14 her real name was Rita. I'm blanking on her last name.
- 15 Q Was it Webb?
- 16 A Webb.
- 17 Q When was the first time you met Sarah and Clare Bronfman?
- 18 A Other than when they were very little children perhapses
- 19 in the office, it was a meeting in 2005. Edgar asked me to
- 20 | come to lunch at his apartment. When I got there, Sarah and
- 21 Clare and Nancy Salzman were present. And we had lunch.
- 22 Q Was this in New York?
- 23 A It was in New York at Edgar's apartment.
- 24 Q And what was discussed at this meeting with Edgar
- 25 Bronfman, Clare Bronfman, Sarah and Nancy Salzman.

- 1 A The purpose of the meeting was whether or not I could
- 2 help them with their public relations. They were concerned
- 3 about their public relations, or else they wouldn't be coming
- 4 to me. I took away from the meeting that I thought they
- 5 thought I was more important than I was; nevertheless, Edgar
- 6 suggested I listen to them talk about it.
- 7 I asked a former employer of mine who had opened his
- 8 | own PR firm, to meet with them and discuss what he could do
- 9 for them. I'm not a public relations expert; in fact, I use
- 10 him a lot to advise me in the corporation. And that's what
- 11 the purpose was.
- 12 Q Were you asked to help them?
- 13 A I was asked to help them.
- 14 Q By who?
- 15 A By Edgar.
- 16 O And Sarah and Clare Bronfman, was there a term used in
- 17 the family to refer to them?
- 18 A They were referred to as the girls, which is not
- 19 different from the first four sons, that were referred to as
- 20 the boys. But that was just the way when one was talking
- 21 about them by generation without a specific name, it was the
- 22 constant way it was phrased.
- 23 Q So did you in fact introduce them to your public
- 24 relations colleague?
- 25 A I did.

HERBITS - DIRECT - MR. LESKO 1324 1 I don't remember if I introduced them personally, 2 but I did make arrangements for them to meet. They did meet. 3 And it did not continue. Why not, if you know? 5 There are two versions of it. He contends that he quit because they wouldn't give him any information for him to help 6 7 them. And I believe I've been told that some people think 8 that they fired him. But I have no idea. It ended. A part from introducing Sarah and Clare Bronfman to the 9 10 public relations colleague, did you assist them in any other 11 way? 12 Multiple times I was asked to. In 2008 I believe there 1.3 was some correspondence between me and Edgar, and Edgar and 14 Clare and Sarah and asked me to help them. They were -- and 15 then -- so I agreed to try to try to help. 16 They asked me to help them with a case involving 17 Rick Ross, who I had not met or had ever spoken to. And who, 18 because they were concerned that they wanted to tie up 19 difficulties they had with him before the possibility that the 20 Dalai Llama, his Holiness, would come to appear, they didn't 21 want any disagreements going on. 22 THE COURT: Before you go to that. 23 Were they consulting with you in your capacity as an 24 attorney or in some other capacity?

THE WITNESS: Capacity as looking for Edgar and

of documents and I wrote them a seven-page memo saying that everything you suggest here is wrong.

And if you could just briefly summarize the advise that you gave them in this memo?

23

24

Case 1::	18-cr-00204-N	NGG-VMS Document 768 Filed 07/19/19 Page 134 of 279 8523	5 PageID #:
		HERBITS - DIRECT - MR. LESKO	1326
1		MR. AGNIFILO: I apologize, could we have a	brief
2	sidebar?		
3		THE COURT: Sure.	
4		(Continued on the next page.)	
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SIDEBAR CONFERENCE 1327 1 (Sidebar conference.) 2 MR. AGNIFILO: I didn't mean to interrupt 3 Mr. Lesko's presentation. I would imagine, though, if he's 4 acting in a Covell capacity as an adviser through an attorney, 5 he just said that was an attorney-client privilege, is there a 6 collective view, I don't know what it would be, as to whether 7 this is or is not privileged? 8 MR. LESKO: I believe, we have not been notified that Clare Bronfman is asserting any privilege relating to 9 10 this communication. But out an abundance of caution, I can 11 I don't have to get into the substance. move on. 12 THE COURT: Why don't we do that. 13 MR. LESKO: The only caveat is, the impeachment 14 materials we received from Mr. Agnifilio, I believe it was 15 either this morning or last night, include the memo that 16 Mr. Herbits is discussing and one of the items he relied upon 17 in drafting this memo. I'm not going to go there --18 THE COURT: If counsel has the memo, then the 19 privilege has been broken. Yes? 20 MR. AGNIFILO: Well, but I don't know it's been 21 broken by the client. I think there is a subpoena. 22 understanding is -- I'm putting this together we just got all 23 this stuff last week -- there was a subpoena to Mr. Herbits 24 and he complied with the subpoena. I have no idea, because

it's not my privilege so it's not my client.

SIDEBAR CONFERENCE

1328

1 MR. LESKO: Your Honor --2 MR. AGNIFILO: We got it from the Government. 3 MR. LESKO: These materials have been produced to 4 the defense; they were produced a while ago. Ms. Bronfman has 5 been very aggressive in asserting various privileges, that 6 your Honor is aware of this, there has been extensive 7 litigation. She's not asserted privilege with respect to these documents. These documents have been distributed to 8 9 multiple third-parties. Again, I don't have to go into this, 10 but the only reason I'm bringing this up is I don't think it 11 then would be an area of cross-examination. 12 MR. AGNIFILO: I wouldn't do that. If you're not 13 going to get into it, I'm not going to get into it. 14 I'm wondering, as a signal, is there a way of you 15 doing what you need to do if there is in fact a privilege in 16 place? I don't know what you're going to ask. I'm trying to 17 raise an issue before it's a problem. 18 MR. LESKO: I don't think there is a privilege. 19 THE COURT: If it's presented that this document has 20 been widely distributed, certainly because of that and no 21 privilege has been asserted by Ms. Bronfman in connection with 22 this document, then there is no privilege at this point. So 23 you can do what you want. Up to you. I'm not going to worry 24 about it. She's got many lawyers; she can assert her rights. 25 (End of sidebar conference.)

interest of the Dalai Llama visiting the organization.

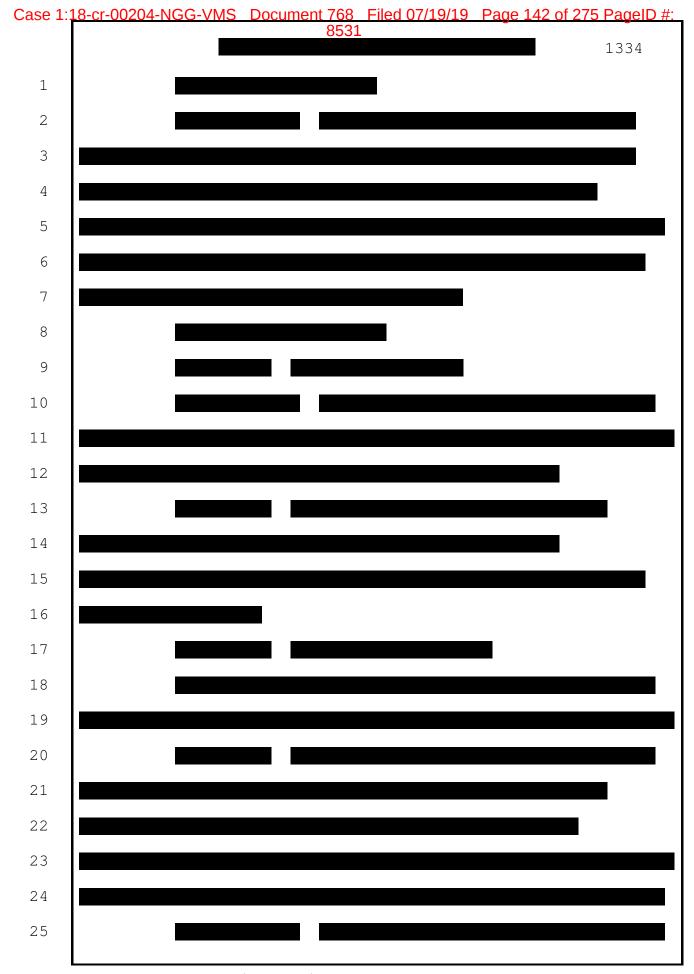
THE COURT: Who were the governors at the time, if

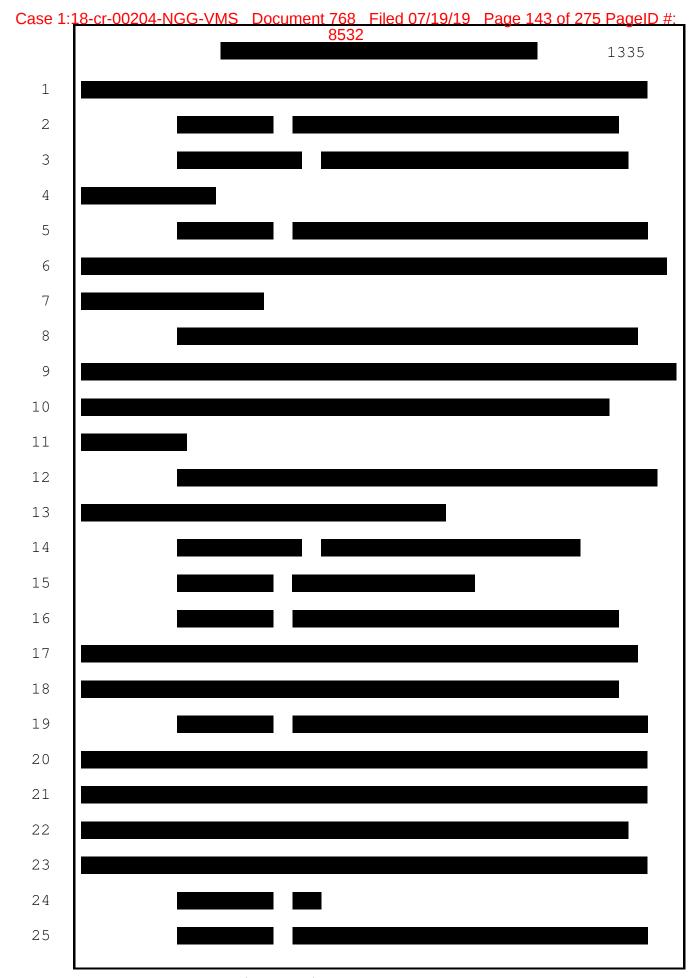
to an Attorney General that I never met.

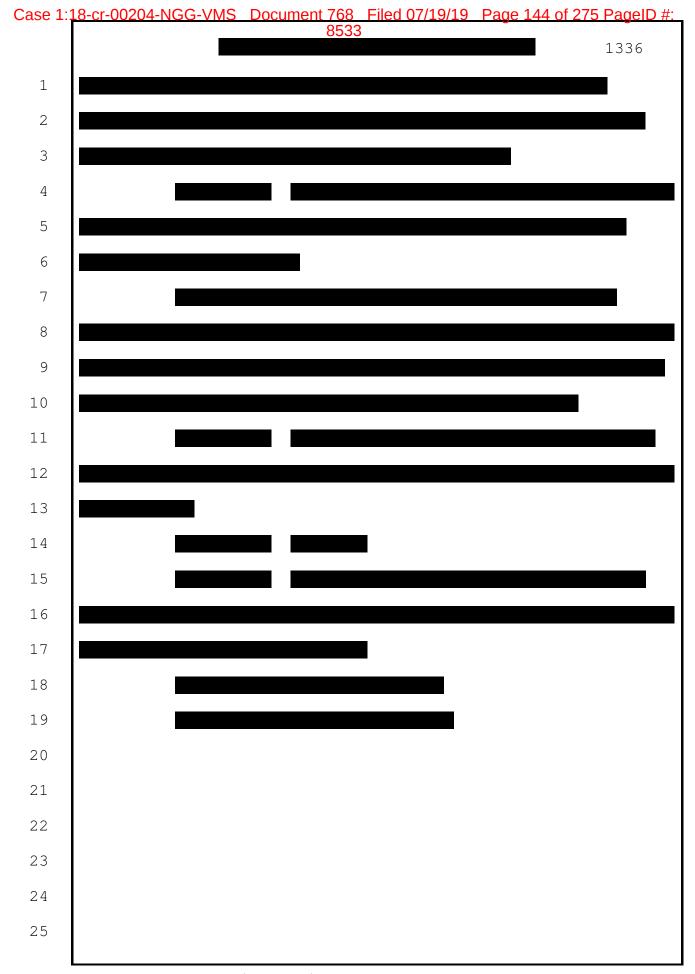
24

HERBITS - CROSS - MR. LESKO

- 1 Q Why not?
- 2 A Because I felt the request was inappropriate and frankly
- 3 preposterous.
- 4 Q Did Sarah and Clare Bronfman ask you to contact any other
- 5 prosecutors?
- 6 A Two prosecutors in the larger Albany area, we had a long
- 7 | conversation about that. It was on the phone. Because they
- 8 were upset that the prosecutors would not prosecute the people
- 9 who they were targeting. It made no difference to me who they
- 10 were targeting.
- They insisted, for instance, the Constitution of the
- 12 United States required them to prosecute. I explained, from
- my law degree, that prosecutors have discretion as to which
- 14 cases they want to prosecute. I explained why I thought that
- worked, how that was done, and I refused call them.
- 16 O Did Sarah and Clare Bronfman ask you to intervene with
- 17 any press organizations like newspapers?
- 18 A They asked me to call specifically the publisher of the
- 19 Albany Times Union. Because they had begun, the reports had
- 20 began an investigation of what was going on there. They
- 21 wanted me to stop the stories, also in the context of the
- 22 pre-Dalai Llama visit.
- 23 Q Did you do that?
- 24 A No.
- 25 Q When you say "their" you're referring to NXIVM?







1337

1 (In open court.)

- 2 BY MR. LESKO:
- 3 Q How would you characterize Sarah and Clare Bronfman's
- 4 relationship with their father?
- 5 A It was an evolving relationship. Officially when they
- 6 joined the ESP program, Edgar in fact took the course. He was
- 7 | eager to be supportive. I was not near him a lot during that
- 8 period, and he subsequently made a comment to the press which
- 9 Indicated his nervousness about the situation.
- 10 Q What was the comment?
- 11 A That he thought that they were joining a cult.
- 12 Q What publication was that in?
- 13 A Forbes, I believe. That would be before, I wasn't with
- 14 him every day during that period, that was a quieter time.
- 15 Also at that time I believe he sought the advice of
- 16 Rick Ross to try to help and protect his daughters. They went
- 17 from there to requests a few years later, beginning in the
- 18 2005 period when I met with them, and they asked me to do the
- 19 public relations help, which turned out not to happen. And
- 20 then it moved to specific requests, like the issue of the
- 21 Attorneys General and with the District Attorneys. And where
- I was beginning to say, I'm not doing those things.
- But I did not report a lot to Edgar, for a lot of
- 24 reasons. It was bothering him and there was some distress, I
- didn't need to add any. I just minded my own business.

- 1 Q During that time period would you say that it was up and
- 2 down in terms of the relationship or it was uneven?
- 3 A Between Edgar and them?
- 4 Q Yes.
- 5 A I didn't experience Edgar and them personally. I can't
- 6 evaluate it. I know that Edgar was becoming more distressed
- 7 because of conversations I had with him. I can't evaluate
- 8 them in his presence.
- 9 Q Fair enough. Prior to 2011 did you become aware of a
- 10 | court proceeding in California about a property investment
- 11 | made by Clare Bronfman?
- 12 A I was given a call by someone, I don't remember who, who
- 13 said get the transcript. I purchased the transcript from the
- 14 California case, \$1400, I remember that, and I read it.
- And I'm reading it and reading it, I knew nothing
- 16 about any of this before. I read this, I didn't know if there
- was a case, I didn't know that there was real estate going on.
- 18 In reading that case, my name appears, and it appears in
- 19 violation of the oath of the people speaking.
- 20 Q How was your name mentioned?
- 21 A It mentioned me as carrying messages from Edgar to
- 22 Parlato, instructing him what to do about this project. I
- 23 never heard the name Parlato before. I never heard anything
- 24 from Edgar about this case before. And it was, from my law
- 25 school degree, flat out perjury. But the case was over, so I

To the best of your knowledge, was Edgar Bronfman

- 1 aware of the lawsuits?
- 2 A He was aware of them at the point that I reviewed them
- 3 | with him in July 2011. I sat down with him for an hour and I
- 4 | went through all of the things that I had learned, both
- 5 directly in relationship to the girls and indirectly from
- 6 people who were calling. The reason they were calling me is
- 7 Edgar stopped taking calls or meetings with people who were
- 8 worried about the NXIVM issue, and assigned that
- 9 responsibility to me, so I took the calls.
- 10 My answer was the same for all these years that he
- 11 and I agreed with, "I loved my daughters as my daughters. I
- 12 have nothing to do with their affairs." But that's it. I
- 13 listened. I made notes. And at some point it got to the
- 14 point where I felt an obligation to him to brief him on
- 15 everything I knew.
- 16 O In addition to the real estate lawsuit, did you become
- 17 aware of other monies that Clare and Sarah Bronfman lost as
- 18 part of their own involvement in NXIVM?
- 19 A Yes, but not directly. I heard --
- MR. AGNIFILO: Objection.
- 21 THE COURT: Sustained.
- 22 Q In approximately 2009, did Edgar Bronfman ask you to do
- 23 something for his family?
- 24 A Again?
- 25 Q In the 2009 time frame did he ask to do something with

HERBITS - DIRECT - MR. LESKO

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1 the trust?

2 A In 2009 Edgar and his sons asked me to come back to work

3 for them because there was a lot of money and there was not a

4 lot of cash, not unusual for billionaires during the initial

5 part of that crash. They wanted to -- it was told to me by

6 them, they I was the one person they all trusted to be fair.

7 I had been brought back into the trust, which I was not

8 involved in before, and looked at the portfolio. I saw

9 problems with it and I spent the next three years fixing those

10 problems.

11 Q During this time period, did you get to know Edgar

12 Bronfman's sons?

13 A Yes, I knew some the sons, a couple work for the

14 | corporation. I knew the third one because he was in New York

and he was beginning to do a great deal not-for-profit work.

16 I was like an informal consultant and friend. At that period

17 I got to know the fourth son for the first time really,

18 | because he was living in California most of the time. And he

19 began assisting Edgar with his foundation and with other

20 issues, and then sort of became the coordinator of the Trust.

21 It was he and his father who called me initially who said will

I help out. Then I worked with him very thoroughly over the

23 next three years.

22

24 Q How would you characterize the relationship between Edgar

25 Bronfman's sons and Sarah and Clare Bronfman?

- 1 A Well, to the degree they mentioned it, it was, don't talk
- 2 to me about it. They did not want to know. There was some
- 3 resentment, but I don't know the basis of it. I do know that
- 4 they weren't all one happy seven-member family.
- 6 | time frame do you recall any negative press, other than the
- 7 Forbes article you mention recalling NXIVM?
- 8 A I remember being called by the press frequently. But I
- 9 usually gave the same statement, and after a while they got
- 10 bored and stopped calling.
- The one person I had more conversations with than
- 12 anyone with the man, I think his name was Rogato, who was
- working for the Albany Times Union, who was beginning to dig
- 14 deeply into what was going on. My purpose in talking to him
- was to listen. I stuck to the statement because I didn't want
- 16 to represent anybody.
- 17 Q Do you recall Clare Bronfman claiming that her father had
- 18 funded someone in litigation involving NXIVM, paid someone?
- 19 A There was early on in the records that I have, there were
- 20 | allegations that he funded Rick Ross. And but I don't know
- 21 when that stopped or how it stopped. I was not involved in
- 22 that.
- I do remember later an e-mail that Edgar copied me
- on to Clare that said, you're wrong, I'm not funding him, and
- 25 I'm not going to fund him. And it was a fairly hostile

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 151 of 275 PageID #:
	8540 HERBITS - DIRECT - MR. LESKO 1343
1	communication between the two.
2	Q Between 2005 and 2010, do you recall if Edgar Bronfman
3	used a computer?
4	A Yes, he always used the computer.
5	Q Did he have one or more than one?
6	A He had one in his office. But because I traveled with
7	him all the time, I traveled with his laptop. But I always
8	traveled with two laptops. Because sometimes they didn't
9	work, this was in the early years of laptops and he would get
10	frustrated. I would take that one away and give him the other
11	one. When we came back I had them both updated on everything
12	on both of them.
13	Q The computer in his office was what type of computer?
14	A I don't know what type.
15	Q Desktop?
16	A Desktop.
17	Q Did he use that computer personally?
18	A A lot of times during the day.
19	Q When traveled did he actually use one of the laptops?
20	A He did. It was his habit after we left a capital some
21	where for him to write a diary on his computer of the trip.
22	MR. LESKO: Your Honor, if we could initially just
23	publish some exhibits to the witness?
24	THE COURT: Go ahead.
25	BY MR. LESKO:

HERBITS - DIRECT - MR. LESKO

- 1 Q Mr. Herbits, I'm showing you on your screen what is
- 2 marked for identification as Government's Exhibit 1491R. Do
- 3 you see part of that document before you?
- 4 A Yes.
- 5 Q This is a three-page document, I'm going to show you the
- 6 third page. I'm going to show you the second page. And I'm
- 7 going to show you the first page. Chain of e-mails, do you
- 8 recognize those e-mails?
- 9 A Yes.
- 10 Q Are they e-mails between you and Clare Bronfman in
- 11 November of 2008?
- 12 A Yes.
- 13 Q I'm going to show you what is marked for identification
- 14 | as Government's Exhibit 1492R, two-page document, start with
- 15 the second page. Then I'm going to move to the first page.
- 16 Do you recognize that document?
- 17 A Yes.
- 18 Q Is that an e-mail from you to Clare Bronfman in
- 19 November 2008?
- 20 A Yes.
- 21 O Showing you what is marked for identification as
- 22 Government's Exhibit 1493R. I'm going to show you the second
- 23 page. Now I'll show you the first page. Do you recognize
- 24 that document?
- 25 A Yes.

Case 1::	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 154 of 275 PageID #:
	<mark>8543</mark> HERBITS - DIRECT - MR. LESKO 1346
1	Q Is that dated January 6, 2011?
2	A Yes.
3	Q And you recognize that?
4	A Yes.
5	Q Last in the series, Government's Exhibit 1496R, do you
6	recognize that document?
7	A Yes.
8	Q E-mail from you to Clare Bronfman, Sarah Bronfman, CCing
9	Edgar Bronfman on January 19, 2011?
10	A Yes.
11	MR. LESKO: Your Honor, we offer Government's
12	Exhibit 1491R, 1492R, 1493R, 1494R, 1495R, 1496R.
13	MR. AGNIFILO: No objection.
14	THE COURT: All right. Exhibits 1491R, 1492R,
15	1493R, 1494R, 1495R, 1496R are received in evidence.
16	(Government Exhibit 1491R, 1492R, 1493R, were
17	received in evidence.)
18	(Government Exhibit 1494R, 1495R, 1496R, were
19	received in evidence.)
20	BY MR. LESKO:
21	Q I'm going to start with 1491R. So this is an e-mail
22	chain; is that correct?
23	A Yes.
24	Q A collection of back and forth e-mails between you and
25	Clare?

something because of my relationship to Edgar and their

Well, I'm getting the feeling that they want me to do

24

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1 relationship together to Edgar to do things which I had

2 | already expressed over a number of times before that I was not

3 going to do. And it was just basically my pushing back.

4 Q And so the next e-mail, again dated November 10, 2008,

Clare Bronfman indicates, I am confused. I was under the

6 impression that Dad had asked you to come in and help resolve

7 | this situation. And he wanted to help us turn things around

8 and confided in you to do so. If do you not want to or feel

that you are not able to, just tell me and I can find someone

10 who is able to.

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11 Is that what she said in that e-mail?

A That's what I remember.

Q Your response is, Typical - friend or enemy.

What did you mean by that?

15 A I was beginning to get the impression that those who

helped her were friends; and those who they didn't like were

17 enemies. I was beginning to feel the shift that I was joining

the second group.

19 Q You also say in that same e-mail that, Your behavior

20 makes it clear that you want nothing more than a puppet.

What did you mean by that?

22 A They wanted someone to do their bidding exactly as they

23 want to do it, with or without knowledge, regardless of the

24 consequences, regardless if it was proper or not. And my

refusal to do, as I expressed to them, I'm not a puppet. I'm

- that the Times reporter was undertaking. And that's her expression of it.
- 25 Next she says, The owner of this entity is George Hearst.

Case 1::	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 158 of 275 PageID #: 8547
	HERBITS - DIRECT - MR. LESKO 1350
1	I'm sure you recollect the situation back in the 70s with
2	Patti Hearst. In the case brought against her, she defended
3	herself through the accusations of brainwashing.
4	What is Clare Bronfman referring to there?
5	A The left-over feeling from Edgar was that the girls were
6	getting deeply involved in what he had earlier
7	MR. AGNIFILO: I object, Judge. I object to this.
8	That wasn't the question.
9	MR. LESKO: I'll rephrase, your Honor.
10	THE COURT: All right.
11	BY MR. LESKO:
12	Q What was the situation, if you know back, in the 70s with
13	Patti Hearst?
14	A Going back a long time for my memory.
15	MR. AGNIFILO: I object to this as well.
16	THE COURT: Overruled. If you know.
17	A I remember the case only from the media, obviously I had
18	no connection with it. But she used a defense that she was
19	brainwashed and shouldn't be found guilty.
20	THE COURT: Next question.
21	Q Was she part of a organization?
22	MR. AGNIFILO: Your Honor, I object. I object. I
23	object to all of this, Judge.
24	THE COURT: Overruled.
25	Q Was she part of

- 1 A She was part of an organization, and the organization was
- 2 under trial, and she was sort of trying to get from underneath
- 3 it.
- 4 Q To cut to the chase, part a group that was committing
- 5 bank robberies?
- 6 A Yes.
- 7 Q Her defense was she was brainwashed by the group?
- 8 A That's right. And what was eventually found to be crimes
- 9 in that context, she should be excused from.
- 10 Q So Clare Bronfman continues, As any person who values
- 11 their intelligence is aware, brainwashing implies a lack of
- 12 free will and is scientifically debunked. Even prisoner of
- war camps have never been successful in brainwashing inmates.
- 14 If there were truly an effective method of brainwashing, it
- 15 would revolutionize the prison system. I can certainly make a
- 16 logical leap given our other evidence and the actions of the
- 17 Times Union that Hearst carries an active prejudice against
- 18 us.
- What was your understanding of what Clare Bronfman
- 20 was saying there?
- 21 A This goes beyond my scientific knowledge of brainwashing
- 22 and cults and stuff like that. But clearly she's simply
- 23 saying that this person is trying to do to us what is not
- 24 true, because we haven't been brainwashed.
- 25 Q Clare Bronfman goes on in the second paragraph, I do know

that Bill Clinton in his last day in office pardoned Patti.

Next sentence, He might be able to help.

contact.

What was your understanding of what Clare Bronfman was alluding to there?

A The implication of that is that the Bronfmans and the Clintons knew each other very well for a long period of time, going back to the 90s when the President asked Edgar to Chair a Presidential Advisory Commission on Holocaust Assets in the United States. It was Hilary who worked that issue, successfully, with some states and the State Department, et cetera. He then I believe gave Edgar a medal, Honor of Freedom or something. Edgar supported Hilary in her Senate races and Presidential race, and they stayed in pretty close

At one point the President, while he was President, did a event for the World Jewish Congress and came to speak to us. And unbeknownst to us, it was a surprise there was so much press as there were, he had told them that he announced an Iranian policy of sanctions for something that they were doing, which got national press.

But they knew each other pretty steadily from the early 90s through his death.

- Q How about you? Did you have a personal relationship with Bill Clinton?
- 25 A It wasn't one that I could walk up and say, Do you have a

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1 few minutes, I got to talk to you about something. He

2 recognized me when he saw me, as did Hilary. They frequently

3 came to stand where I was standing, because I didn't believe

4 it was my position to go to him. We would talk for a few

5 minutes. We talked about issues. We talked about politics.

6 We talked about the family. But I never had lunch with him.

Q When Clare Bronfman says, He might be able to help. Is

she referring to her father or you contacting Bill Clinton?

A She's talking to me, because she continued to believe

that I could go to her father and get this taken care of.

11 Q Next paragraph, last sentence, this is a paragraph

dealing with Rick Ross, I also believe you could rapidly

facilitate the proper Indictment and conviction of Rick Ross

14 and Joseph O'Hara.

15 What is your understanding of what Clare Bronfman is

16 saying there?

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17 A It's the same messages going on at that point for three

years, four years. And I never changed my position. I was

19 not going to get involved. I have never spoken to the man,

never spoken to anybody in his office. It just wasn't

21 | something I was going to do.

Q Was it your understanding that Clare Bronfman wanted Rick

23 Ross and Joseph O'Hara to get indicted?

24 A Yes.

25 Q Let's turn to your response. You start out by saying,

- quote, "A detective with no leads is blind," end quote. What
- 2 did you mean by that?
- 3 A Same story. She was asking me to do something for her
- 4 | without telling me what the specifics were. For instance, if
- 5 | she had given me specifics, demonstrated at least to me that
- 6 he crossed threshold on behavior of Rick Ross' part that I
- 7 | thought was a problem, a problem either in terms of law or in
- 8 terms of behavior or morality or something that was negatively
- 9 effected, I would have taken it to Edgar and said, we need to
- 10 look at it. But ask me to be a detective without information,
- 11 I can't do it.
- 12 Q Let's move quickly through the next few exhibits. Second
- 13 page of 1492R is basically blank. First page, for efficiency
- 14 sake, I'll try to summarize it, then move on.
- Fair to say at the top, basically the first
- 16 paragraph is a quote of an e-mail from Clare Bronfman to you.
- 17 And then the bottom paragraph is your response to that e-mail.
- 18 Is that fair to say?
- 19 A Right.
- 20 O In essence does Clare Bronfman's e-mail indicate that
- 21 certain information regarding a loan was made available to
- 22 Forbes and she's upset by that. And raises the question of
- 23 whether that implicated attorney-client privilege?
- 24 A She was looking at that as a possible way to get to the
- 25 lawyers to punish them.

Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 163 of 275 PageID #: HERBITS - DIRECT - MR. LESKO 1355 1 Q Who was David Stoll? 2 He was Edgar's personal and the Trust's personal lawyer, 3 nothing to do with the corporation, but whom I met a number of 4 times. That was his primary activity, outside counsel. 5 And an e-mail from Clare appears to be dated November 20, 6 2008, her response is dated November 24, 2008; is that correct? 7 8 Yes. 9 Your response in essence is, Implicating an attorney 10 would be problematic, could be slanderous, and would be 11 expensive. 12 Yes. 13 (Continued on next page.) 14 15 16 17 18 19 20 21 22 23 24 25

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 167 of 275 PageID #:
	<mark>8556</mark> HERBITS - DIRECT - MR. LESKO 1359
1	Q Sorry. I'm going to go back to 1494R.
2	A little too quick with the trigger there.
3	So after mentioning that she has mediation, Clare
4	Bronfman then says quote: I hope the Ross and Sutton Camp are
5	inspired to settle and make substantial appropriate
6	reparations, paren, restoring the good names and monies of
7	NXIVM, comma, Nancy, comma, Keith, comma, my sister and
8	myself, et cetera, end paren.
9	What was your understanding of what Clare Bronfman
10	meant when she said that?
11	A This was all in the context of trying to clear up issues
12	before the Dalai Lama came so that NXIVM would be, in a sense
13	by his presence, given a good reputation.
14	Q So you respond to these two emails, the one from
15	December 6th and the one from December 15th, on December 15th;
16	is that right?
17	A Right.
18	Q And, in essence, you basically say you're not listening
19	to me.
20	A Right.
21	Q Okay. And that you have nothing to add, right?
22	A Right.
23	Q Okay.
24	All right. Government's 1495R. This is a
25	January 6th, 2011, email from Edgar Bronfman to Clare

Roger Stone, do you recognize that name?

21 Q Have you ever spoken with Frank Parlato?

22 A No.

23 Q Have you ever seen Frank Parlato?

A No, never been in the same room with him, to my

25 knowledge.

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	8567 HERBITS - CROSS - MR. AGNIFILO 1370
1	Q Take your time.
2	I'm not going to have you for another five minutes.
3	A That's okay.
4	THE COURT: You have had him for five minutes. This
5	is your second five minutes.
6	MR. AGNIFILO: I was referring to the second.
7	THE COURT: I'm watching the clock. Don't keep
8	promises you can't keep.
9	Go ahead.
10	Q All right. So and now I lost my train of thought.
11	Now it's going to take me ten seconds. All right.
12	So Clare was in NXIVM for a period of time, right?
13	A Yes.
14	Q All right. And she was trying to convince her father
15	that this was a good thing, that she liked this and she wanted
16	to convince Edgar this was helping her, and she wanted Edgar
17	to try it, right?
18	A Yes.
19	Q And Edgar tried it and it wasn't for Edgar; fair to say?
20	A Edgar tried ESP.
21	Q ESP, okay.
22	And
23	A And he said it wasn't for him personally, but, you know,
24	that was nothing he was worried about at that stage.
25	Q Okay.

22

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Α

No.

I have not had that many experiences with that many

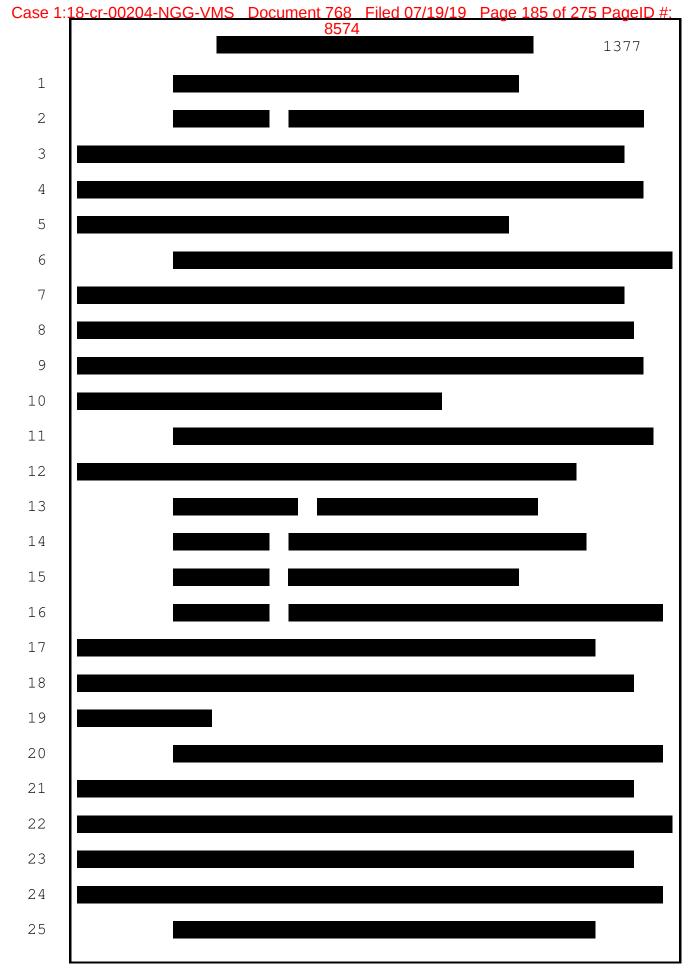
In all of your dealings, have you ever met Keith Raniere?

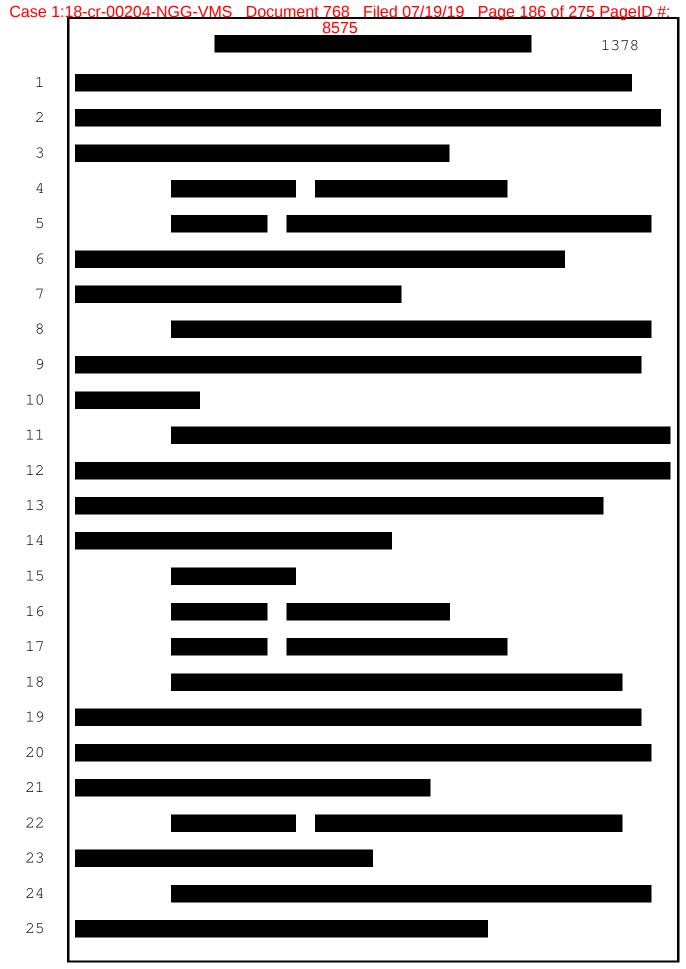
people with that many wives and that many children.

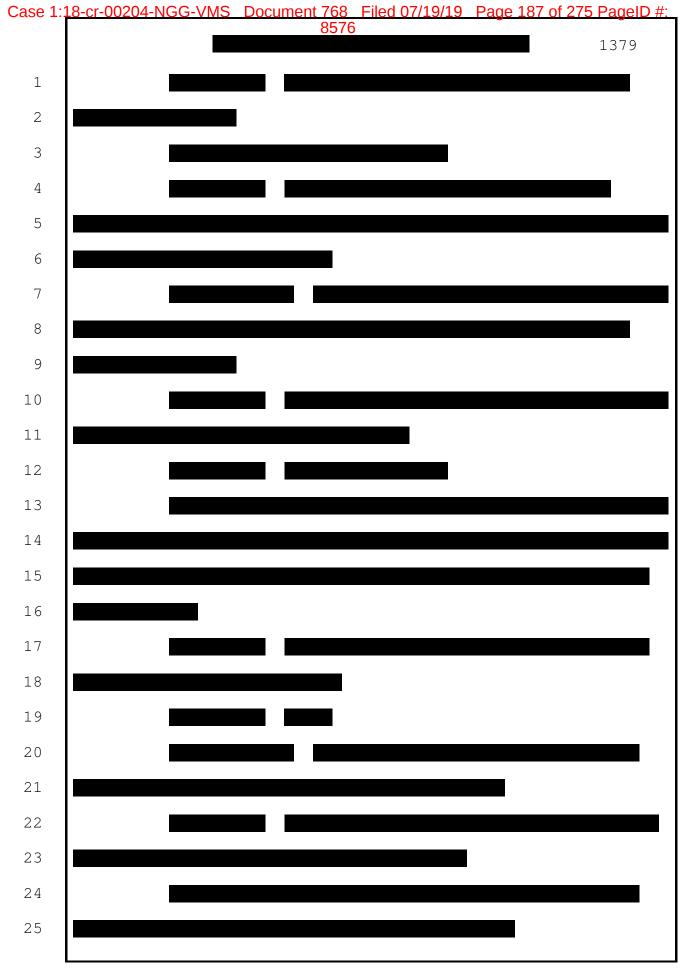
2013. The fact is the relationship was up and down during that period; pressuring him and disappointing him, because he expressed that to me; making it unpleasant for him; asking him

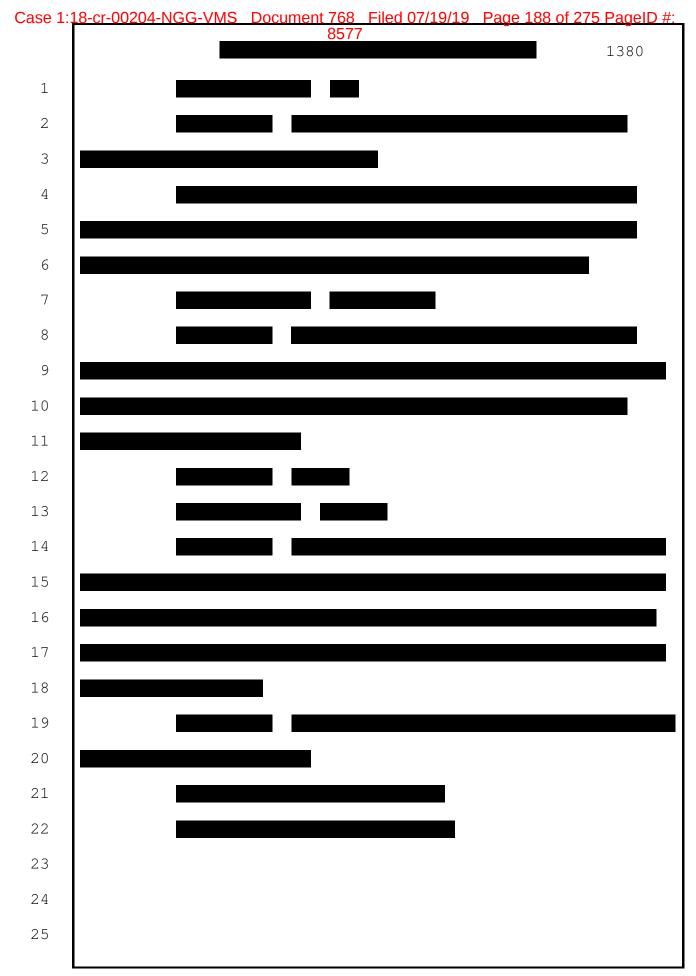
24

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 184 of 275 PageID #:
	8573 HERBITS - RECROSS - MR. AGNIFILO 1376
1	MR. LESKO: Objection.
2	A I have no reason to.
3	MR. AGNIFILO: I have nothing further.
4	THE COURT: Anything further?
5	MR. LESKO: No, Your Honor.
6	THE COURT: The witness is excused.
7	You may stand down, sir.
8	THE WITNESS: Thank you.
9	THE COURT: You're welcome.
10	(Whereupon, the witness was excused.)
11	THE COURT: We'll take our afternoon break.
12	All rise for the jury.
13	(Jury exits the courtroom.)
14	THE COURT: The next witness is ready. How much on
15	direct?
16	MS. PENZA: I believe approximately an hour, Your
17	Honor. Maybe a little bit more.
18	THE COURT: He may roll over to next week
19	tomorrow morning. And then you have your next witness who is
20	a cooperator.
21	MS. PENZA: Yes. That's right, Your Honor.
22	THE COURT: Okay. We'll take a ten-minute break.
23	(Whereupon, a recess was taken at 3:29 PM)
24	THE COURT: Sidebar please.
25	(Continued on the next page.)









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	8579 PROCEEDINGS 1382
1	144 through 149.
2	153, 154, 155, 158, 160, 161, 162, 163, 168, 171,
3	174, and 177.
4	And then 176.
5	THE COURT: I'm sorry.
6	MS. PENZA: I'm going that was one set of lists
7	so now I'm going back to 176.
8	THE COURT: Is admitted on consent?
9	MS. PENZA: Yes, these are still on consent. I'm
10	sorry, they were just in a different in a separate place.
11	THE COURT: Go ahead. Keep going.
12	MS. PENZA: GX176 sorry, Government Exhibit 176,
13	180, 365, 368, 369, 370, 371, and 1483.
14	And then over objections that have been raised by
15	defense counsel.
16	Government Exhibit 204 and 204A. Government
17	Exhibit 1399. Government Exhibit 1401. Government
18	Exhibit 1463 through 1469, and then 1472.
19	THE COURT: Now, as to those that are over
20	objection, is it subject to something?
21	MS. PENZA: No, your Honor, those were all the ones
22	where you ruled that they were I think
23	MR. AGNIFILO: So the basis of the objection was we
24	objected because these are just documents that were found in
25	the box that was in Nancy Salzman's basement.

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 191 of 275 PageID #:
	8580 PROCEEDINGS 1383
1	THE COURT: Oh, right.
2	MR. AGNIFILO: And we objected on hearsay grounds,
3	the reliability ground
4	THE COURT: Right.
5	MR. AGNIFILO: with the absence of a witness.
6	Your Honor ruled on it, so I'm not raising the
7	objection anew, I'm just noting the fact, that's all.
8	THE COURT: That they were objected to and I
9	overruled the objection.
10	MR. AGNIFILO: That's right.
11	THE COURT: Okay. So all of those that have been
12	identified are admitted into evidence, 1, 2, 3, 4 and 11 of
13	them are over objection.
14	MR. AGNIFILO: Yes, Judge.
15	THE COURT: Okay. All right.
16	So ordered. Let's move on.
17	Shall we bring in the jury now?
18	MS. PENZA: Yes, Your. Honor, thank you.
19	THE COURT: All right. Please bring in the jury.
20	(Jury enters the courtroom.)
21	THE COURT: Please be seated.
22	The government may call its next witness.
23	MS. PENZA: Thank you, Your Honor.
24	The government calls Investigator Charles
25	Fontanelli.

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 192 of 275 PageID #: 8581
	FONTANELLI - DIRECT - MS. PENZA 1384
1	THE COURTROOM DEPUTY: Please raise your right hand.
2	(Witness takes the witness stand.)
3	CHARLES FONTANELLI, called as a witness, having been first
4	duly sworn/affirmed, was examined and testified as follows:
5	THE WITNESS: I do.
6	THE COURTROOM DEPUTY: Please have a seat.
7	Please state and spell your full name for the
8	record.
9	THE WITNESS: Charles Fontanelli. C-H-A-R-L-E-S,
10	F-O-N-T-A-N-E-L-L-I.
11	THE COURT: You may inquire.
12	MS. PENZA: Thank you, Your Honor.
13	DIRECT EXAMINATION
14	BY MS. PENZA:
15	Q Good afternoon, Investigator Fontanelli.
16	A Good afternoon, ma'am.
17	Q For whom do you currently work?
18	A New York State Police.
19	Q What is your title there?
20	A I'm an investigator.
21	Q Do you work with any other agencies?
22	A Yes, ma'am. I'm a task force officer with the Federal
23	Bureau of Investigation.
24	Q And what does it mean to be a task force officer?
25	THE COURT: Could you just stay closer to the

execution of search warrants. Some arrests. Surveillance.

Administrative responsibilities, as well as communicating with

24

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 195 of 275 PageID #: 8584
	FONTANELLI - DIRECT - MS. PENZA 1387
1	other law enforcement agencies in regards to the
2	investigation.
3	Q Have you also visited locations of interest in the case?
4	A I have.
5	(Continued on next page.)
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858

FONTANELLI - DIRECT - MS. PENZA

- 1 A Okay.
- 2 Q But as a general matter, is it fair to say that we're
- 3 going to be identifying a number of locations where members of
- 4 NXIVM lived or interacted with each other?
- 5 A That's correct.
- 6 Q Let's start with Slide 1. What does this depict?
- 7 A This particular slide to the left you have two residences
- 8 that were involved in this investigation, 13 Twilight Drive
- 9 which is located in the town of Clifton Park and 557
- 10 Englemore Road, which is also located in Clifton Park.
- 11 At the bottom of this slide, you have a 455 and 457
- 12 New Karner Road, which are located in Albany, New York, that
- was the NXIVM headquarters and corporate offices.
- In the center of the screen there's a yellow circle
- which contains 17 properties were which also significant in
- 16 the investigation.
- 17 Q And then if we turn to the next slide, what does this
- 18 circle represent -- this circle that was added represent?
- 19 A This circle represents out of all the previous locations
- 20 that we just addressed, are located within is 5.4-mile radius
- 21 of each other.
- Q Moving to Slide 3, what is indicated on Slide 3 regarding
- 23 | the -- the 17 properties circled?
- 24 A This slide represents that all 17 properties within that
- 25 circle are located within a 1.3-mile radius of each over.

FONTANELLI - DIRECT - MS. PENZA

- 1 Q And then the next slide, does this slide depict those 17
- 2 properties that we have seen -- that were previously indicated
- 3 in the smaller circle?
- 4 A That's correct.
- 5 Q Now, can you just describe -- there is an area on this
- 6 map called Knox Woods. Can you describe what that is?
- 7 A Knox Woods is a community within the Clifton Park area,
- 8 Halfmoon, New York, area. It's a series of townhouses.
- 9 They're -- they're basically like garden apartments. They're
- 10 two store. Most of the units are connected and located within
- 11 clusters throughout the property.
- 12 Q And as a more general matter, can you just describe what
- 13 the area that we're looking on this map is like?
- 14 A Yes. This area is basically a suburban area, tree-lined
- 15 streets. Most of the residences are single-family residences.
- 16 And then Knox Woods is, like I said, they're
- 17 multifamily-residences.
- 18 Q And are a lot of those attached like townhomes attached
- 19 to each other?
- 20 A That's correct.
- 21 Q And so what is depicted in this next -- in Slide 5?
- 22 A In this slide you have a street sign there for
- 23 Knox Woods. You see that at the entrance of the community.
- 24 And then you have a circle in the middle of the slide. Those
- 25 Knox Woods locations are located within that circle and all of

garden apartments, two stories, and there's multiple units

- 23 Sure (indicating). This door here is the entrance to 12
- Wilton Court. 24
- 25 And is this a close-up of 12 Wilton Court?

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	<mark>8592</mark> FONTANELLI - DIRECT - MS. PENZA 1395
1	A That is correct.
2	Q And the 12 is pulled out and highlighted?
3	A Yes, ma'am.
4	Q Okay. And can you tell us what thing street is?
5	A This street sign, again, is located within the community
6	of Knox Woods. This is the street sign for Flintlock Lane.
7	Q Okay. And turn to the next slide. Can you explain what
8	this is?
9	A This is a group of residences located on Flintlock Lane.
10	There are three particular residences of interest. 1, 2, and
11	3 and this is a photo of all three residences.
12	Q Okay. I'm going left to right. Can you just tell us
13	which numbers they would be?
14	A Sure. Showing on the far left is the residence with the
15	vehicle in the driveway. That's Number 1.
16	The next residence to the right is Number 2.
17	And then to the right of two is Number 3
18	Flintlock Lane.
19	Q Okay. And then is this I know that there's a tree
20	kind of obscuring it, but is this a close-up of Number 1
21	Flintlock Lane?
22	A Yes, ma'am.
23	Q And the one is highlighted?
24	A That's correct.

And then is -- what is the next picture?

FONTANELLI - DIRECT - MS. PENZA

- 1 A The next picture is Residence Number 2 Flintlock Lane.
- 2 Q And was the number sign visible from where you took the
- 3 picture?
- 4 A No, it wasn't.
- 5 O You don't have a cull out as Number 2?
- 6 A That's correct, there's no two in the picture, but that
- 7 Number 2 Flintlock Lane.
- 8 Q And then the next -- the next one?
- 9 A That's the far right. That's Number 3 Flintlock Lane you
- 10 can see the Number 3 above the door there.
- 11 Q Okay. What is the next street sign that you can see?
- 12 A Again, this is another street sign within the Knox Woods
- 13 community. This particular street sign is for Hale Drive.
- 14 O And so what is the next slide?
- 15 A This particular slide is a -- is a wide shot of 3 Hale
- 16 Drive of the residences on Hale Drive, one of which is three.
- 17 Q Okay. And is this a close-up of 3 Hale Drive?
- 18 A That's correct.
- 19 Q I'm sorry, I should have asked you on the previous one.
- 20 Can you identify where three is on the wider shot?
- 21 A I believe this is three here (indicating).
- 22 Q Showing you Slide 23 of Government's Exhibit 176. Can
- 23 | you describe what this is?
- 24 A Again, this is a building on Hale Drive. It's made up of
- 25 multiple units.

And then is this a closer view of what you were describing behind the bushes?

23

24

25

Okay.

Q And then I'm sorry turning to -- oh, you said you
mentioned the street sign for Oregon Trail and I'll move on to

And what does this picture depict?

2.4

25

the next slide.

FONTANELLI - DIRECT - MS. PENZA

- 1 A This picture depicts a residence located on Oregon Trail,
- 2 it's Number 3 Oregon, and that's the -- the front of the photo
- 3 you can see the mailbox for that residence.
- 4  $\mathbb{Q}$  And have you been inside that house?
- 5 A I've also been inside this residence.
- 6 O And whose residence was that?
- 7 A This residence belongs to Nancy Salzman.
- 8 Q And we'll talk about this is little bit later in your
- 9 testimony, but why were you in Nancy Salzman's house?
- 10 A This particular location was a location where we
- 11 conducted a search warrant.
- 12 Q Turnings to the next slide, is this another view of 3
- 13 Oregon Trail?
- 14 A Yes, ma'am.
- 15 Q Turning to next slide, what is this?
- 16 A This is a secondary residence located on Oregon Trail.
- 17 This is Number 21 Oregon Trail, which is located just done the
- 18 block from Number 3.
- 19 Q Can you read this street sign?
- 20 A This is a street sign for Milltowne Drive which was
- 21 located in Waterford, New York.
- 22 Q And even though it's located in Waterford, is it very
- 23 | close to the residences we've just been looking at?
- 24 A It's very close. I think like a 3-minute drive.
- 25 Q Turning to next picture. What is this?

23 Milltowne Drive, the house we just looked at?

Α Yes, she did.

24

25 I'm going to walk through a few of those documents. This

Case 1:	18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 209 of 275 PageID #:
	<mark>8598</mark> FONTANELLI - DIRECT - MS. PENZA 1401
1	document isn't Bates Numbered but I'll show you what is
2	somewhere in the middle of Government's Exhibit 365. And at
3	the top of this document it says can you see that it says
4	spreadsheet page?
5	A Yes, ma'am.
6	Q And how would you describe this document?
7	A This is basically is description of the residence located
8	on at 9 Milltowne Drive.
9	Q And is that 9 Milltowne Drive there in the middle where
10	it says address?
11	A That is correct.
12	Q And is it the picture of 9 Milltowne Drive?
13	A Yes, it is.
14	Q And does it describe whether 9 Milltowne Drive has a
15	basement?
16	A Yes, it does here on the printout says that it has a full
17	basement.
18	Q Okay. Can you circle that, please?
19	A Yes, ma'am (indicating).
20	Q Thank you.
21	I'm now showing you a document from
22	Government's Exhibit 365. That has a header Brookfield Place
23	Homeowner's Association, Inc. Do you see that?
24	A Yes, ma'am.
25	Q And it has a date of July 30, 2018?

- 21 Ms. Decrescenzo provide the documents related to any other
- 22 properties?
- 23 A Yes, she did.
- Q And was one of those properties 8 Raleigh Drive?
- 25 A That's correct.

- 15 And if we turn to the last page of the document, is it
- 16 signed?
- 17 Yes, ma'am. It's signed dated August 7, 2018. It's
- 18 signed by Daniella Bergeron.
- 19 And is that Daniella Bergeron's signature there?
- 20 Yes.
- 21 MS. PENZA: May we go back to the PowerPoint,
- 22 Your Honor?
- 23 37 can you describe what -- just to reorient ourselves, s
- 24 we're still looking at the 17 properties area; is that
- 25 correct?

And is this a larger image, a wider view of Sports Barn?

23

24

25

New York.

That's correct.

8004

FONTANELLI - DIRECT - MS. PENZA

- 1 Q Now, this is -- now, we're back to the overview slide
- 2 that we looked at, at the beginning. And now -- now we're
- 3 going to look at 455-57 New Karner Road, correct?
- 4 A That's correct.
- 5 Q Okay. And is this 455 New Karner Road?
- 6 A Yes, that's 455 New Karner Road in Albany, that's the
- 7 NXIVM headquarters.
- 8 Q And what is this image of?
- 9 A That's a closer image of the front door of that location,
- 10 455 New Karner Road, says Executive Success Programs on the
- 11 glass door.
- 12 Q And what is this sign?
- 13 A This is a parking sign just a few feet from the front
- 14 door in the front parking lot. It's a sign that states that
- 15 that particular parking spot is reserved for N. Salzman.
- 16 Q And is this 457 New Karner Road?
- 17 A That is correct. It's located in very close proximity of
- 18 455 that's a photo of 457 Karner Road.
- 19 Q And is this another angle of that building?
- 20 A Correct. That's another photo, different angle of the
- 21 building in which you can clearly see the Number 457 in the
- 22 upper right-hand corner.
- 23 Q Going back to the overview slide are we now going to look
- 24 at 13 Twilight Drive?
- 25 A That's correct.

Case 1:18-cr-00204-NGG-VMS Document 768 Filed 07/19/19 Page 217 of 275 PageID #:							
	<mark>8606</mark> FONTANELLI - DIRECT - MS. PENZA 1409						
1	557 Englemore Road?						
2	A That is correct.						
3	Q And it's transferring that property from another						
4	individual to whom?						
5	A To Rosa Laura Junto De La Vega.						
6	Q And does Rosa Laura Junto De La Vega generally go by Rosa						
7	Laura Junto?						
8	A That's correct.						
9	Q Turning to the second page is that Rosa Laura Junto's						
10	name again?						
11	A That's correct.						
12	Q And it says Rosa Laura Junto residing where?						
13	A 21 Oregon Trail in Waterford, New York.						
14	Q And is there a date on this document?						
15	A Yes, ma'am, there is. It's dated April 2nd, 2014.						
16	Q And I'm know showing you what's in evidence as						
17	Government's Exhibit 371. Are you familiar with this						
18	document?						
19	A Yes, ma'am.						
20	Q And is this is document from the New York State						
21	Department of State regarding Stinka, LLC?						
22	A That's correct.						
23	Q And is there an address with this to which the						
24	Department of State will mail the process listed on behalf of						
25	the entity?						

And how can you identify it?

- 1 A Again, I could identify it by my initials and the date at
- 2 the bottom of the exhibit.
- 3 Q And does this CD contained as Government's Exhibit 1401
- 4 contain a full and true and correct copy of the search warrant
- 5 return provided by Google for the oakhaven.haven@gmail.com
- 6 account?
- 7 A That's correct.
- 8 Q I now want to direct your attention to March 27, 2017 --
- 9 2018, rather. Did you participate in the execution of a
- 10 search warrant on any property on that date?
- 11 A Yes, I did. I participated in a search warrant which was
- 12 executed at the residence of Nancy Salzman located at 3 Oregon
- 13 Trail in the town of Clifton Park, New York.
- 14 Q And when you went to -- when you went to the house, was
- 15 Nancy Salzman present?
- 16 A Yes, she was.
- 2 Can you describe the general procedure for conducting the
- 18 search of a residence?
- 19 A Sure. Generally before we can conduct a search warrant
- 20 | we'll have a brief on close proximity to the residence prior
- 21 to going to the residence. This particular day we -- we had a
- 22 | brief at -- in the parking lot of a diner which was located a
- 23 | short drive from the residence. At the brief we discussed,
- 24 you know, officer safety which is our main concern. We also
- 25 discussed the parameters of the search warrant and the

- 1 evidence that we're looking to collect.
- 2 Q Did you have a specific role on the date of the execution
- 3 of this search on 3 Oregon Trail?
- 4 A On that particular day, I assisted Special Agent Michael
- 5 Weaver and I was -- I was the photographer for the day.
- 6 Q And can you just describe the general procedure for
- 7 | photographing -- that takes place when you photograph a
- 8 property when you're executing a search warrant on it?
- 9 A Yes, ma'am. Generally when we get in the residence we'll
- 10 take exterior photos of the residence prior to entering. As
- 11 | we enter the residence we'll take photos going in and then
- we'll photograph each room within the residence prior to the
- 13 search being conducted.
- 14 After the search is conducted we'll take photographs
- of any evidence that we want to document and then we'll take
- 16 exit photos to show the condition of the house on our way out.
- 17 Q I'm showing you what's already in evidence as
- 18 Government's Exhibit 180.
- 19 Are you familiar with this?
- 20 A This particular exhibit contains the photos that were
- 21 secured from the search warrant that day. I recognize my
- 22 | initials and the date at the bottom.
- 23 Q Did you select a certain number of those -- this is full
- set of photographs, but did you select a certain number to
- 25 show to the jury?

8610

FONTANELLI - DIRECT - MS. PENZA

1413

A Yes, ma'am.

- MS. PENZA: May I have the PowerPoint, Your Honor?
- 3 Q Okay. The first two slides I'm just going to skip back
- 4 and forth between them. What do those two slides represent?
- 5 A These two slides represent a plaque that we took a
- 6 photograph of prior to taking any photos at the scene. It
- 7 documents the date, which was March 27, 2018. It has the case
- 8 | identification number, which is blacked out in this photo. It
- 9 listed the photographer, myself. That's Peter Fontanelli and
- 10 it identifies the location of 3 Oregon Trail, Waterford,
- 11 New York, 12188.
- 12 Q And so why were there two of those in this instance?
- 13 A In this instance there's two plaques because we use two
- 14 disks. We took so many photos that the first disk filled up.
- 15 So when we rewrote it with the second disk before we took any
- 16 photographs we took an additional photo of the plaque.
- 17 Q Turning to the slide can you describe what this is?
- 18 A This is the exterior of 3 Oregon Trail, the residence in
- 19 which we conducted the search warrant.
- 20 Q And can we see the Number 3 there by the garage?
- 21 A Yes, you can see the Number 3 indicated on the pillar
- 22 next to the garage in this photo.
- 23 Q And is this the view inside the garage?
- 24 A Yes, ma'am.
- 25 Q And was there anything -- anything of note in the bins?

861

FONTANELLI - DIRECT - MS. PENZA

- 1 A In those particular bins up on the shelves here we looked
- 2 through them. The only item of note was there was quite a
- 3 large number of Forbes magazines contained in those particular
- 4 bins.
- 5 Q Forbes magazine that contained articles about -- not
- 6 about this case, rather, but about NXIVM?
- 7 A That's correct.
- 8 Q And can you describe what this picture shows?
- 9 A This is a -- this is a picture of the hallway as you
- 10 enter the residence. It leads from the front door and this is
- 11 the view.
- 12 Q Okay. So what room are we looking into from this view?
- 13 A Straight down the hall in the rear of the residence you
- 14 can see that's the kitchen.
- 15 Q And then what is this view?
- 16 A When you come in the front door down that hallway this
- 17 room is directly to your left, I believe it's a den.
- 18 Q And is that a piano in that picture?
- 19 A Yes, ma'am. There's a large piano in that room.
- 20 Q Okay. And what is the image?
- 21 A Again, it's that hallway this time looking to the right.
- 22 That's a library. You walk through those French doors,
- 23 there's bookshelves with multiple books.
- 24 Q And can you describe the next view?
- 25 A This is a photo of the kitchen looking into the den and

Q And did you also bring in a special part of the FBI to help process that, those electronic devices?

devices recovered from the search?

There were quite a number.

22

23

24

- 1 A Yes. When we realized the large volume of electronic
- devices, which were located in the residence we made a request
- 3 to the New York field office and a member of their evidence
- 4 team responded to help us process the scene.
- 5 Q And I'm showing you Slide 66, essentially a combined
- 6 PowerPoint.
- 7 What is depicted in this picture?
- 8 A That's a picture of an Apple computer, I believe it's
- 9 MacBook Air.
- 10 Q And why does it have a number -- can you explain hat it
- 11 means that it has a number next to it?
- 12 A Sure. Throughout the search warrant each piece of
- evidence when it's located it's given an evidence number.
- 14 This particular piece of evidence is Number 13.
- MS. PENZA: Your Honor, may I approach the witness?
- 16 THE COURT: Yes, you may.
- 17 Q Investigator Fontanelli, can you take a can look at this
- 18 and tell me what it is?
- 19 A This is evidence Number 13. This is the Apple MacBook
- 20 which we seized from the home of Nancy Salzman. It's the same
- 21 MacBook which you see in this picture here.
- MS. PENZA: And I note, Your Honor, it's marked as
- 23 Government's Exhibit 205 for identification.
- 24  $\mathbb{Q}$  And does it actually have the Number 13 on the back?
- 25 A Yes, it actually has the Number 13 here (indicating). It

- 1 tells you the room we secured it from, the kitchen,
- 2 specifically the counter. It tells you a description of the
- 3 piece of evidence that we're collecting. In this particular
- 4 instance it's Apple MacBook Pro Air. It will be the serial
- 5 | number of the item. It tells who it was collected by and it
- 6 gives another identification down here. When we bring it back
- 7 to the field office this particular number is assigned to the
- 8 piece of evidence.
- 9 Q And Investigator Fontanelli, can I ask you to take the
- 10 piece of equipment outside of the bag and show it to the jury?
- 11 A (Witness complies.)
- 12 Q Thank you.
- 13 And this is the same computer that's in this
- 14 photograph?
- 15 A That is correct.
- 16 Q And you mentioned that there is a special unit of the FBI
- 17 that processes the electronic devices?
- 18 A That's correct.
- 19 Q And showing you what are already in evidence as
- 20 Government's Exhibit 1463, 1464, 1465, 1466, 1467, 1469, and
- 21 1472.
- Have you seen these documents? I'll show you the
- 23 Exhibit Number. Have you seen these documents?
- 24 A Yes, ma'am.
- 25 Q And are these documents that were recovered from the

This was a white board located in that office.

861

FONTANELLI - DIRECT - MS. PENZA

- 1 Q What is this room?
- 2 A This is a room that was in close proximity to the office.
- 3 Again, off that main room in the basement, there was another
- 4 room and this is a picture of that.
- 5 Q Was anything recovered from this room?
- 6 A Located in this room, we located a box of documents.
- 7 Q And can you describe -- is this the same -- is this
- 8 another picture of the same room?
- 9 A That's the same room taken from a different angle.
- 10 Q And can you describe generally where the box of documents
- 11 was recovered from?
- 12 A You can't see in this particular picture, but if you came
- in the room from the front door, that table and chairs would
- 14 be your left, and directly on the floor to your right there
- 15 was a box of documents which we located.
- 16 O Turning to the next slide. Can you describe what we see
- 17 here?
- 18 A In this particular photo you can see that box of
- documents that I was referring to to the right of the door.
- 20 It's labelled as Evidence Number 4.
- 21 Q And is this a closer-up photo?
- 22 A That's a close-up photo of the box.
- 23 Q Okay. And then what is this?
- 24 A Those are just photos of the -- within this box, there
- 25 was various folders labeled of individuals' names, and that's

does it have the same type of labeling as the computer did

Case 1:18-cr-00204-NGG-VMS						
	8619 FONTANELLI - DIRECT - MS. PENZA 1422					
1	indicating where you found it and what the item number was?					
2	A Yes. This this particular evidence tag indicates that					
3	this piece of evidence is Item Number 4. It was located on					
4	the lower floor of the residence at 3 Oregon Trail on					
5	3/27/2018.					
6	Q And I'll just ask you to open it up.					
7	And is it in substantially the same condition as it					
8	was when you first recovered it?					
9	A Yes, it is.					
10	MS. PENZA: Your Honor, may I have the Elmo, please.					
11	BY MS. PENZA:					
12	Q I'm just going to go through some of the file folders.					
13	Okay. Can you read the name of this file folder,					
14	please?					
15	A Stephen Herbits.					
16	Q Okay. And can you read the name of this file folder,					
17	please?					
18	A Edgar Bronfman.					
19	Q Can you read the name of this file folder?					
20	A Roger Stone.					
21	Q Can you read the name of this file folder?					
22	A Rick Ross.					
23	Q Can you read the name of this file folder?					
24	A Charles Schumer.					
25	Q Can you read the name of this file folder?					

Case 1:18-cr-00204-NGG-VMS							
		8620 FONTANELLI - DIRECT - MS. PENZA 1423					
1	А	Frank Parlato.					
2	Q	Can you read the name of this file folder?					
3	А	A David Soares.					
4	Q	Q Can you read this file folder?					
5	А	WJC.					
6	Q	I'm just going to open up this one for a second. I'm					
7	going	to block it because these haven't been redacted yet.					
8		But can you read what the WJC stands for?					
9	А	World Jewish Congress.					
10	Q	Can you read this one?					
11	А	Israel					
12	Q	I'm sorry.					
13	А	Israel Singers.					
14	Q	Can you read this one?					
15	A Toni Natalie.						
16	Q	Can you read that one?					
17	A	Juval Aviv.					
18	Q	Can you read this one?					
19	А	Malcolm Stevenson Forbes.					
20	Q	Can you read this one?					
21	A	Michael Freedman.					
22		This one?					
23		George Hearst.					
24		Can you read what this file folder says?					
25	А	It's an abbreviation for miscellaneous.					

THE COURT: All right. Everyone may be seated.

Yes, sir.

THE WITNESS:

You are excused, sir.

23

24

But then there's another privilege that's been asserted having to do with NXIVM Corporation. And as to that, counsel for NXIVM is going to call in tomorrow morning at

24

MS. HAJJAR: Yes, Your Honor. The government has seen a redacted version of it. It does not address every area that could potentially be elicited on direct or cross-examination of this witness.

22

23

24

morning at 9:00, and then we'll go from there.

MS. HAJJAR: No, thank you, Your Honor.

the range of their concerns are. But we'll find out tomorrow

THE COURT: I'm just not sure what -- you know, what

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with the lawyers for NXIVM?

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		0000	1433				
1	I N D E X						
2	WITNESS		PAGE				
3	MARK VICENTE						
4	CROSS-EXAMINATION						
5	REDIRECT EXAMINATION RECROSS-EXAMINATION	BY MR. AGNIFILO	1303				
6	STEPHEN HERBITS						
7	DIRECT EXAMINATION	BY MR. LESKO	1307				
8	CROSS-EXAMINATION REDIRECT EXAMINATION	BY MR. LESKO	1373				
9	RECROSS-EXAMINATION	BY MR. AGNIFILO	13/4				
10	CHARLES FONTANELLI						
11	DIRECT EXAMINATION	BY MS. PENZA	1384				
12		EXHIBITS					
13	GOVERNMENT	PAGE					
14	1002A	1306					
15	1491R, 1492R, 1493R 1494R, 1495R, 1496R						
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                                                          12207 [1] 1193/20
MR. AGNIFILO: [138]
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MR. DIAZ: [1] 1428/4
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                                                          126 [1]
                                                                  1381/24
MR. LESKO: [72] 1206/24
                             $10 million [3] 1339/6
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