

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

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X  
UNITED STATES OF AMERICA, : 18-CR-204(NGG)  
Plaintiff , :  
-against- : United States Courthouse  
KEITH RANIERE, et al., : Brooklyn, New York  
Defendant. : June 5, 2019, Tuesday  
9:30 a.m.

- - - - - X

TRANSCRIPT OF TRIAL  
BEFORE THE HONORABLE NICHOLAS G. GARAUFI  
UNITED STATES DISTRICT JUDGE, and a jury.

APPEARANCES:

For the Government: RICHARD P. DONOGHUE  
United States Attorney  
BY: MOIRA K. PENZA  
TANYA HAJJAR  
MARK LESKO  
Assistant United States Attorneys  
271 Cadman Plaza East  
Brooklyn, New York 11201

For the Defendant: BRAFMAN & ASSOCIATES, P.C.  
767 Third Avenue  
New York, New York 10017  
BY: MARC A. AGNIFILO, ESQ.  
TENY ROSE GERAGOS  
  
DEROHANNESIAN & DEROHANNESIAN  
677 Broadway  
Albany, New York 12207  
BY: PAUL DerOHANNESIAN, II, ESQ.  
DANIELLE R. SMITH, ESQ.

Court Reporter: Michele D. Lucchese, RPR, CRR  
Official Court Reporter  
E-mail: MLuccheseEDNY@gmail.com  
Proceedings recorded by mechanical stenography; transcript  
produced by Computer-Aided Transcription.

1 (In open court; outside the presence of the jury.)

2 THE COURT: Appearances, please.

3 MS. PENZA: Moira Penza, Tanya Hajjar, Mark Lesko  
4 for the United States. Good morning, Your Honor.

5 Also at counsel table is Special Agent Michael  
6 Weniger and paralegal specialist Teri Carby.

7 THE COURT: Good morning.

8 MR. AGNIFILO: Good morning, Your Honor. Marc  
9 Agnifilo, Teny Geragos, Paul der Ohannesian, and Danielle  
10 Smith for Keith Raniere, who is with us this morning. Good  
11 morning, Your Honor.

12 THE COURT: Good morning. Please be seated.

13 All right. I have a letter which was sent to me at  
14 5:00 this morning, is that right?

15 MR. AGNIFILO: That is us, Judge.

16 THE COURT: Okay. We don't need to discuss it until  
17 we finish with the cross-examination of the current witness.  
18 We can do it then. I can hear from the Government about these  
19 motions.

20 And we have James Loperfido; is that right?

21 MR. LESKO: Yes, Your Honor.

22 THE COURT: Who is testifying and you have completed  
23 direct?

24 MR. LESKO: I did, Your Honor.

25 THE COURT: And now we have cross.

1 MR. AGNIFILO: Yes.

2 THE COURT: Is the jury present?

3 Okay, let's bring in the witness and we will have  
4 cross-examination.

5 MR. AGNIFILO: Very good, Your Honor.

6 THE COURT: Please bring in the jury.

7 (Witness takes stand.)

8 THE COURT: Please be seated.

9 (Jury enters the courtroom.)

10 THE COURT: Please be seated. Good morning, members  
11 of the jury.

12 THE JURY: Good morning.

13 THE COURT: All right, at this time we will continue  
14 with the witness James Loperfido. The direct examination has  
15 been completed.

16 Mr. Agnifilo, you may cross-examine the witness.

17 MR. AGNIFILO: Thank you, Your Honor.

18

19

20

21

22

23

24

25

Loperfido - cross - Agnifilo

3389

1 JAMES LOPERFIDO,

2 been previously sworn, was examined and testified as  
3 follows:

4 CROSS EXAMINATION

5 BY MR. AGNIFILO:

6 Q Good morning, Mr. Loperfido.

7 A Good morning, sir.

8 Q My name is Marc Agnifilo. I represent Keith Raniere. I  
9 am going to ask you some questions. If I ask you a question  
10 that's not clear to you, or you don't understand it or you  
11 want me to rephrase it, just ask me to do that and I'm happy  
12 to do that, okay?

13 A Yes.

14 Q Now, you said on direct examination on Friday that Keith  
15 was, in your view, the decisionmaker at NXIVM; correct?

16 A Yes, sir.

17 Q All right. And you understood he created the NXIVM  
18 curriculum; is that right?

19 A Yes.

20 Q And that he created the course materials; correct?

21 A Yes.

22 Q And the coursework?

23 A Yes.

24 Q And the modules, he created all that stuff; right?

25 A I believe so.

Loperfido - cross - Agnifilo

3390

1 Q So he created the intellectual content to all of the  
2 teachings in NXIVM and ESP; is that right?

3 A Yes.

4 Q And you said you worked as an accountant for NXIVM for  
5 two years, I think you said, from the end of 2004 until the  
6 end of 2006; is that correct?

7 A I believe so. I'm not positive, but I believe it's close  
8 to that.

9 Q Around that period of time; right?

10 A Yes, sir.

11 Q And you met with Keith Raniere one or two times?

12 A Twice.

13 Q Okay. In the entire time that you were working at NXIVM  
14 you met with him on two occasions; is that right?

15 A Yes, sir.

16 Q How many times did you meet with Keith Raniere to discuss  
17 the accounting work that NXIVM did?

18 A Never.

19 Q How many times did you meet with Keith Raniere to talk  
20 about the different businesses that NXIVM would create?

21 A I don't believe I did.

22 Q And I think you said on direct examination you met with  
23 him once because there was some talk of an investment in gold  
24 of some sort. Do I have that; right?

25 A Yes.

Loperfido - cross - Agnifilo

3391

1 Q Okay. Just describe to the jury very briefly what you  
2 recall about that.

3 A It was a meeting in a home in north of Albany and it was  
4 a large meeting with a presenter that was talking about an  
5 investment in metals, I believe it was called.

6 Q Okay. And do you remember the other -- so that's one of  
7 the two times you met with Keith?

8 A Yes, sir.

9 Q Do you remember the other time?

10 A It was a few days later.

11 Q Okay.

12 A In the same building and to -- I don't remember the whole  
13 conversation, but part of it was about the meeting a few  
14 nights before.

15 Q Okay. So other than these two meetings within a few days  
16 of each other, you never met with or spoke to Keith Raniere,  
17 fair to say?

18 A Yes.

19 Q The person you dealt with mostly was Kathy Russell;  
20 correct?

21 A Yes.

22 Q And Kathy Russell was the bookkeeper at NXIVM?

23 A The accountant, yes.

24 Q Or the accountant. And in your view, she was an honest  
25 and thorough accountant; correct?

MDL

RPR

CRR

CSR

Loperfido - cross - Agnifilo

3392

1 A She was a thorough accountant, yes.

2 Q Now, you didn't say honest. I said honest and thorough  
3 and you said thorough. Did you have a view that she wasn't  
4 honest?

5 A Yes.

6 Q Now, you said -- do you remember telling the FBI that she  
7 was the best bookkeeper that you ever worked with?

8 A Yes.

9 Q When you told the FBI she was the best bookkeeper you  
10 ever worked with, what do you mean?

11 A She was very thorough, her working papers were excellent.  
12 When I asked for something, it may have taken a while to get  
13 it, but when she brought it to me they were thorough, they  
14 were good working papers.

15 Q Okay. And just tell the jury what you mean by working  
16 papers? What are working papers?

17 A Worker papers are -- it's the base information that you  
18 use before you start the accounting process.

19 Q Okay. So what types of information would be among the  
20 working papers?

21 A I would ask her to proof-out a line item for me in a  
22 profit and loss statement that she had prepared and she would  
23 present the documents to me and the paperwork to proof-out  
24 that line.

25 Q What sort of documents would she present to you when you

Loperfido - cross - Agnifilo

3393

1 are asking for a profit and loss statement?

2 A Everything from bills to a ledger sheet.

3 Q Okay. And she kept good records, meticulous records, I  
4 think you said; correct?

5 A Yes, sir.

6 Q She always had the backup document at the ready; correct?

7 A Whenever I asked for it, yes.

8 Q Sometimes in your business, when you work with companies,  
9 you don't get the backup document so quickly; correct?

10 A Yes, sir.

11 Q But that was never the case with Kathy Russell, she  
12 always gave you the backup documents when you asked for them;  
13 correct?

14 A I believe that's correct.

15 Q All right. I think you talked at one point on direct  
16 examination that there was a task force to research different  
17 tax issues. Am I right about that?

18 A Not just tax issues, but, yes, you are right about that.

19 Q So what else did the task force look into?

20 A Structure, business structure, how to handle particular  
21 issues. One in particular was what we talked about last week  
22 which was the large loss in the market.

23 Q And you are talking about a commodities investment?

24 A Yes, sir.

25 Q Did you have any direct involvement in that investment?



Loperfido - cross - Agnifilo

3394

1 A No, sir.

2 Q All right. So when you testified on direct examination  
3 on Friday about it, is it fair to say you were testifying  
4 about what you had heard from different people?

5 A That's correct.

6 Q And none of what you testified to about this investment  
7 on Friday was anything you yourself saw; correct?

8 A That's correct.

9 Q Or conversations that you yourself were involved in with  
10 the people making the investments?

11 A That's correct, yes.

12 Q So really what you were doing is you were telling the  
13 Court and the jury things that you had heard from other  
14 people; right?

15 A In this regard, yes.

16 Q Now, on this task force were a number of people in  
17 addition to yourself, fair to say?

18 A Yes, sir.

19 Q One of the people on this task force was Joe O'Hara?

20 A Correct.

21 Q Just tell us very briefly, who is Joe O'Hara?

22 A Joe O'Hara was an attorney/consultant/businessman in the  
23 Albany area.

24 Q All right. How long have you known Mr. O'Hara?

25 A Since probably around 2000. Around the year 2000.

Loperfido - cross - Agnifilo

3395

1 Q How did you meet him?

2 A I met him through another client.

3 Q And Mr. O'Hara provided legal services as a lawyer for  
4 NXIVM; correct?

5 A I can't answer that. I know he provided services; I'm  
6 not so sure there were always legal services.

7 Q So when you say you were not sure there were legal  
8 services, are you suggesting that they were illegal services  
9 or that they were non-legal services?

10 A Non-legal services.

11 Q So, in other words -- I just want to understand your  
12 answer; you are not saying that he was providing illegal  
13 services to NXIVM; you're saying that, even as a lawyer, he  
14 was providing services to NXIVM that might not have been the  
15 typical thing that a lawyer would provide?

16 A Yes.

17 Q Okay. Now what sort of services would he provide?

18 A Everything under the sun, I believe. Mostly of a  
19 business consulting nature.

20 Q Okay. Now, was he licensed to practice in New York?

21 A I don't know.

22 Q Okay. Did you ever have that conversation with him?

23 A No.

24 Q Did you ever have that conversation with anyone else?

25 A Yes.

Loperfido - cross - Agnifilo

3396

1 Q Who did you have that conversation with?

2 MR. LESKO: Objection.

3 Q You have to wait.

4 THE COURT: You can answer that question.

5 A I'm pretty -- I don't know who I did, but I think Nancy  
6 Salzman told me that he was not --

7 THE COURT: Don't tell me.

8 MR. AGNIFILO: Let me ask a different question just  
9 so it's focused.

10 THE COURT: Yes.

11 Q Without getting into what anybody said to you -- which I  
12 am not asking you --

13 A I'm sorry.

14 Q That's all right.

15 Did you have conversations with other people, just  
16 yes or no did you, about whether Joe O'Hara was licensed to  
17 practice law in New York?

18 A Yes.

19 Q Who did you have that conversation with, not getting into  
20 what anyone might have told you?

21 A Ms. Salzman.

22 Q Anyone else?

23 A Possibly.

24 Q And do you recall when you would have had that  
25 conversation with Ms. Salzman?

Loperfido - cross - Agnifilo

3397

1 A Towards the end of my relationship with NXIVM.

2 Q Now, Mr. O'Hara is the one who brought you in to work at  
3 NXIVM; correct?

4 A Yes, sir.

5 Q Just tell us a little bit about how that happened.

6 A I was his accountant as well and he had asked me if I was  
7 interested in a new client that he had that needed -- that  
8 needed services, accounting and business consulting services.

9 Q Okay. Now, Mr. O'Hara, do you know if Mr. O'Hara was  
10 licensed to practice law in the District of Columbia?

11 A Don't know.

12 Q Now, the -- and he was enthusiastic about NXIVM when he  
13 was asking you to come on to do accounting work; correct?

14 A Yes, sir.

15 Q And you did come on to do accounting work?

16 A Yes, sir.

17 Q And the person -- I think we talked about this, you  
18 worked mostly with Kathy Russell; is that the person you had  
19 the most contact with?

20 A Yes.

21 Q And Kathy Russell was a member of this task force as  
22 well; correct?

23 A Yes.

24 Q Was Keith Ranieri a member of this task force?

25 A No.

MDL

RPR

CRR

CSR

Loperfido - cross - Agnifilo

3398

1 Well, can I take -- take no back?

2 Q Go ahead. Please.

3 A In a way he was; Kathy couldn't make a decision without  
4 talking to Keith first. So we would have a meeting on a  
5 Friday and Kathy would say, well, I'll need to talk to Keith  
6 about this and at our next meeting we will discuss this  
7 further.

8 Q All right. One of the issues I think you said that you  
9 discussed was this issue of whether NXIVM had a connection to  
10 the State of Washington; correct?

11 A Yes.

12 Q That's one of the things that you talked about on direct  
13 examination, do you remember that?

14 A Yes.

15 Q Was the issue that Washington, the State of Washington,  
16 has a value-added tax? Do you remember that being the issue?

17 A Yes, sir.

18 Q Just explain to the jury, very briefly, what is a  
19 value-added tax?

20 MR. LESKO: Objection.

21 THE COURT: You may answer that.

22 A It's a different type of tax based on -- based on assets.  
23 I don't remember the formula anymore in Washington, but for  
24 the most part it's based on assets. It's sort of like a sales  
25 tax that we would have in New York State.

Loperfido - cross - Agnifilo

3399

1 Q All right, and were you involved in trying to solve  
2 whatever the tax issue was with the State of Washington?

3 A Yes, sir. The issue was where was the cash register,  
4 where was the income taken, where was the money for the work  
5 performed in the State of Washington, where was it actually  
6 transacted.

7 Q Right. So tell me if this is right: Part of the issue  
8 was does NXIVM, the business, have a sufficient presence in  
9 the State of Washington to be subject to this value-added tax  
10 in the State of Washington.

11 A Part of it.

12 Q So part of the issue was trying to figure out what -- at  
13 the time, classes were being offered in the State of  
14 Washington; correct?

15 A I believe so, yes.

16 Q And so the issue was whether the mere fact that NXIVM  
17 classes were being offered in Washington caused NXIVM to be  
18 subject to the State of Washington value-added tax, in a  
19 nutshell, fair to say?

20 A Yes.

21 Q And you attempted to deal with this issue in a legal and  
22 appropriate way; correct?

23 A Yes.

24 Q And NXIVM would bring in different professionals to deal  
25 with different legal and accounting issues that they had, fair

Loperfido - cross - Agnifilo

3400

1 to say?

2 A Yes.

3 Q And you were dealing with them for the period of time you  
4 were there; right?

5 A Yes.

6 Q Okay. Is there someone named Richard Mays?

7 Do you remember who that is?

8 A No.

9 Q Do you remember him dealing with the Washington issue at  
10 all?

11 A I'm sorry.

12 Q That's fine.

13 Now, did you yourself, in regard to any work that  
14 you did for this task force, you yourself, did you ever report  
15 back to Keith on anything?

16 A I don't believe so, no.

17 Q All right. And in terms of you yourself, did Keith ever  
18 tell you -- other than the two meetings you talked about five  
19 minutes ago, ever tell you he wanted you to do a certain thing  
20 or not do a certain thing in terms of accounting or finances  
21 in any way?

22 A Directly to me?

23 Q Yeah, directly to you.

24 A No.

25 Q Now, you were paid on an hourly basis for your accounting

Loperfido - cross - Agnifilo

3401

1 work?

2 A Yes, sir.

3 Q And you were well paid, fair to say?

4 A Yes.

5 Q In terms of the hourly rate that you were paid, you were  
6 paid more than your typical hourly rate for work of this type,  
7 fair to say?

8 A A little more, yes.

9 Q I think you said on direct examination that you took the  
10 five-day intensive; correct?

11 A Yes, sir.

12 Q I think you said that you also found it useful or  
13 enjoyable, something along those lines?

14 A I did.

15 Q Just tell us very briefly what was useful or enjoyable  
16 about it?

17 A The five-day dealt with -- it's a long time ago, but the  
18 five-day dealt with your place in the universe and how you  
19 relate to people and how you understand people.

20 Q And how was that useful or insightful for you?

21 A For me, it helped to put things in a perspective in how I  
22 relate to people and how I understand what they're saying to  
23 me.

24 Q Okay. And you went on to take the 11-day intensive;  
25 correct?

MDL

RPR

CRR

CSR



Loperfido - cross - Agnifilo

3402

1 A Yes.

2 Q And you found that useful as well; correct?

3 A Yes.

4 Q What was different about the 11-day intensive from the  
5 five-day intensive?

6 A I don't know.

7 Q All right. Do you remember what specifically you found  
8 useful or enjoyable or insightful about the 11-day intensive?

9 A Well, I think it brought home a few things; one is the  
10 idea of consistency as a basis of integrity. I think it  
11 talked about the need to gather data before you jump to  
12 conclusions. There are many things. How you deal with things  
13 like being on the stand right now.

14 Q I'm glad -- sorry.

15 And after the five-day intensive and the 11-day  
16 intensive, you decided to not take any more courses; correct?

17 A Yes.

18 Q And that was a decision that you made; correct?

19 A Yes.

20 Q And you didn't take any more courses?

21 A No.

22 Q Because you didn't want to?

23 A That's correct.

24 Q Were you encouraged to take more courses?

25 A Yes.

Loperfido - cross - Agnifilo

3403

1 Q How were you encouraged?

2 A Pretty much daily.

3 Q Okay. Tell us what people said.

4 A I can't remember words, but there was a lot -- there was  
5 pressure, daily pressure to get more involved, to move to  
6 Albany and to be part of this life-learning program that was  
7 ESP, NXIVM.

8 Q Now, you used the term pressure. Did anyone ever  
9 threaten you?

10 A Of course not, no.

11 Q Did anyone ever force you?

12 A Possibly.

13 Q And what do you mean by possibly?

14 A If I was going to stay with NXIVM as their accountant, I  
15 needed to get more involved.

16 Q But you didn't take more courses and you did stay with  
17 NXIVM as their accountant?

18 A Not really, no.

19 Q When did you take the 11-day, do you remember when it  
20 was?

21 A No.

22 Q You weren't fired because you wouldn't take more courses;  
23 right?

24 A No. I don't know why I was fired to this day, but I was.

25 MR. AGNIFILO: Your Honor, can we have a brief

1 sidebar?

2 THE COURT: All right.

3 (Sidebar held outside the hearing of the jury.)

4 (Continued on the next page.)

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Sidebar Sealed by Order of the Court

3405

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

(The following occurred at sidebar.)

[Redacted text block containing approximately 25 lines of obscured content]

Sidebar Sealed by Order of the Court

3406

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

Sidebar Sealed by Order of the Court

3407

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

[Redacted content]

Sidebar Sealed by Order of the Court

3408

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

[Redacted text blocks]

(Sidebar concluded.)

(Continued on the following page.)

Loperfido - cross - Agnifilo

3409

1 THE COURT: We are ready.

2 BY MR. AGNIFILO:

3 Q Mr. Loperfido, no one at NXIVM ever said to you if you  
4 didn't take more classes you would be fired or they wouldn't  
5 use your services anymore, no one ever said that to you;  
6 correct?

7 A That's a good question. I'm not sure if they did or not,  
8 but probably not.

9 Q You don't remember anyone ever saying to you if you don't  
10 take more classes, Mr. Loperfido, we are going to fire you, we  
11 are not going to use you any more?

12 A They never used those words, no, sir.

13 Q You don't remember anyone ever saying that to you; right?

14 A No.

15 Q When you worked in the NXIVM offices, you worked in or  
16 outside of the accounting office?

17 A Yes, sir.

18 Q Who else worked in the accounting office other than Kathy  
19 Russell?

20 A There were a few part-time people. I don't know who they  
21 are.

22 Q All right. And part of the work you would do is you  
23 would do income tax returns for various of the companies;  
24 correct?

25 A Part of it, yes, sir.



Loperfido - cross - Agnifilo

3410

1 Q And I think you did some income tax returns for  
2 individuals, you said?

3 A Yes.

4 Q And one of them was Pam Cafritz?

5 A Yes, I believe so.

6 Q All right. And you understood Pam Cafritz came from  
7 somewhat of a wealthy family; correct?

8 A Yes.

9 Q And you did tax returns for Nancy Salzman; correct?

10 A Yes.

11 Q Okay. And I think you said that, at different points,  
12 companies failed -- were not filing returns, do you remember  
13 saying that?

14 A Yes, sir.

15 Q Do you know if those companies made income?

16 A I can't tell you. I don't remember.

17 Q So your testimony on direct examination was not, if I  
18 understand you right, that these companies owed income and,  
19 while they owed income, they didn't file tax returns; that was  
20 not your testimony?

21 A I think you mean --

22 THE COURT: Excuse me. Owed income?

23 MR. AGNIFILO: Income.

24 THE COURT: What does it mean, owed income?

25 MR. AGNIFILO: No, I'm sorry, that they had income.

Loperfido - cross - Agnifilo

3411

1 Had income -- realized income.

2 Let me ask a different question.

3 THE COURT: Yes. Please clarify that.

4 MR. AGNIFILO: Yeah, yeah, yeah.

5 Q So it was never the case, as far as you can recall, that  
6 a company that realized income, that had income, did not pay  
7 taxes?

8 A The preparation of the returns really had nothing to do  
9 with the tax owed. It had to do with the need to file the  
10 return.

11 Q Now there are two separate issues; there is -- one is the  
12 need to file the return. I understand that, but that's not  
13 what I am asking.

14 A I misunderstood.

15 Q That's okay. I'm asking for any of the companies that  
16 did not file a return, did that same company realize or have  
17 income that tax year?

18 A I just don't remember.

19 Q Now, you said that you created a number of different  
20 companies. NXIVM had a number of different companies; right?

21 A Yes, sir, uh-hum.

22 Q And you said this is related for reasons, it can reduce  
23 the overall tax; correct?

24 A In some cases surely, yes.

25 Q And this is a common thing that many businesses do;

Loperfido - cross - Agnifilo

3412

1 correct?

2 A Most definitely, yes.

3 Q And there's nothing wrong with creating different  
4 companies to minimize your tax indebtedness; right?

5 A That's correct.

6 Q The way that the tax code works is the tax code will  
7 actually allow, under certain circumstances, companies to pay  
8 less tax depending on how many companies there are and what  
9 they do; correct?

10 A Yes.

11 Q And NXIVM took advantage of these provisions in the tax  
12 code; correct?

13 A I believe so.

14 Q Now, I think you testified that Joe O'Hara got a \$2  
15 million dollar loan from the Bronfmans?

16 A Yes. Bronfmans.

17 Q And O'Hara, you said was a lawyer; correct?

18 A I believe so.

19 Q And he did work for NXIVM; correct?

20 A Correct.

21 Q And he at one point was seeking a loan, a \$2 million loan  
22 from the Bronfmans while the Bronfmans were working at NXIVM;  
23 correct?

24 A Yes.

25 Q And to your knowledge, O'Hara, from time to time would

Loperfido - cross - Agnifilo

3413

1 provide services to the Bronfmans and others at NXIVM;  
2 correct?

3 A I don't know if he provided services to the Bronfmans; he  
4 did definitely to NXIVM.

5 Q And he provided legal services to -- he provided services  
6 to NXIVM at a time when both Bronfmans were working at NXIVM;  
7 correct?

8 A Yes.

9 Q And the money loaned to Mr. O'Hara was supposed to be  
10 used for a vineyard?

11 A I'm not sure what all the money was used for; some of it  
12 was to be used it for a vineyard, yes, for land development.

13 Q And Mr. O'Hara got the \$2 million?

14 A Yes.

15 Q And then he didn't pay it back?

16 A I don't know that.

17 Q Do you know if he paid any of it back?

18 A I don't know.

19 Q You were deposed on two different occasions in connection  
20 with this lawsuit; correct?

21 A Yes.

22 Q When you were deposed, do you remember sitting with  
23 Kristin Keeffe?

24 A Yes, she was at one of the -- the second deposition.

25 Q Just tell us, who is Kristin Keeffe?

Loperfido - cross - Agnifilo

3414

1 A She works at NXIVM.

2 Q And what does she do?

3 A Don't know.

4 Q And why was she at your deposition?

5 A I don't know that either.

6 Q So she was physically present at your deposition?

7 A I don't remember if she was in the room or not, but she  
8 was there.

9 Q Do you remember speaking to her before your deposition?

10 MR. LESKO: Objection.

11 MR. AGNIFILO: I'm not getting into the content,  
12 Judge.

13 THE COURT: You may answer.

14 A I just don't remember. I'm sorry.

15 Q What sort of dealings did you have with Kristin Keeffe?

16 A Hardly any.

17 MR. LESKO: Objection.

18 THE COURT: Sustained.

19 Q Now, Mr. O'Hara said that he had collateral for the loan,  
20 right, that he was providing property in Saratoga Springs as  
21 collateral for the \$2 million loan, you are aware of that?

22 A No, I'm not.

23 MR. LESKO: Objection.

24 THE COURT: Sustained.

25 The jury will disregard the answer.

Loperfido - cross - Agnifilo

3415

1 Q Do you remember having conversations with anyone about  
2 whether Mr. O'Hara committed a fraud?

3 MR. LESKO: Objection.

4 THE COURT: Sustained.

5 Q What involvement did you have in this loan process?

6 A None that I can remember.

7 Q None that you can remember?

8 A Yes, sir.

9 Q You continued to provide services to Mr. O'Hara  
10 throughout this period; correct?

11 A Yes, sir.

12 Q And, in fact, at one point Mr. O'Hara declared  
13 bankruptcy; correct?

14 A That's correct.

15 Q And he owed you a substantial amount of money; right?

16 A Yes.

17 Q How much?

18 A I don't remember, but it was a lot for me. I remember  
19 that part.

20 Q And part of what happened in bankruptcy is you were  
21 thrown into the list of different creditors and, you know,  
22 were you ever paid in full?

23 MR. LESKO: Objection.

24 THE COURT: Sustained.

25 Q Now, what does Strategic Governmental Solutions do?

Loperfido - cross - Agnifilo

3416

1           You talked about them on direct examination. What  
2 do they do?

3 A     Gee, that's a question. They were a company set up to  
4 help school districts deal with information issues relating to  
5 students in medical history of some sort -- I'm not positive.

6 Q     And that was one of Mr. O'Hara's companies?

7 A     Yes, sir.

8 Q     When was the last time you spoke to him?

9 A     I don't -- it's been a long, long time since I actually  
10 spoke to him.

11 Q     Now, you talked about a movie that was shown at V Week, I  
12 think in 2006, do you remember that?

13 A     Yes, sir.

14 Q     And you went to V Week in 2006; correct?

15 A     I believe I did.

16 Q     How many V Weeks did you go to?

17 A     I think just one.

18 Q     And did you pay to go?

19 A     No.

20 Q     Okay. And why didn't you pay to go?

21 A     I was a guest of Ms. Salzman's.

22 Q     And I think you said on direct examination that, at this  
23 V Week, you all watched a documentary film; is that correct?

24 A     Yes, sir. Well, all is kind of a broad term, but there  
25 are many people who watched the documentary.

MDL

RPR

CRR

CSR

Loperfido - cross - Agnifilo

3417

1 Q So you and others from NXIVM watched this documentary  
2 film; correct?

3 A Yes, sir.

4 Q It was a documentary film by someone named Aaron Russo;  
5 is that right?

6 A I think so.

7 Q And Aaron Russo was involved in making movies in the  
8 '80s; correct?

9 A Yes.

10 Q Among other things, he made a movie "Trading Places" with  
11 Eddie Murphy; right?

12 A That's correct.

13 Q The documentary you showed at V Week was called "America,  
14 Freedom to Fascism"; right?

15 A I'm not sure, but it sounds right.

16 (Continued on next page.)

17

18

19

20

21

22

23

24

25



Loperfido - cross - Agnifilo

3418

1 EXAMINATION CONTINUES

2 BY MR. AGNIFILO:

3 Q And you actually arranged to get that movie; correct?

4 A That's correct.

5 Q And you contacted something called Cinema Libre; am I  
6 saying that right?

7 A Probably, yeah.

8 Q And was this a studio?

9 A No, it's a distributor.

10 Q Okay. And who did you -- how did you go about securing  
11 this film so you could all watch it at V Week?

12 A I was asked to -- I was asked to -- to get the film,  
13 and -- and I was able to secure the film, the documentary  
14 for --

15 Q And so you secured this documentary, right?

16 A Yes.

17 Q All right. And at the time did you know who Aaron Russo  
18 was?

19 A No.

20 Q And you used your projection equipment, correct?

21 A Yes, sir.

22 Q Now, is this your personal projection equipment or  
23 someone else's?

24 A It's a non-profit that we set up in my hometown to show  
25 films outdoors and in nursing homes in and around the area.

Loperfido - cross - Agnifilo

3419

1 Q Okay. So you had this projection equipment at the ready?

2 A Yes.

3 Q Right?

4 And you brought your projection equipment to V Week,  
5 right?

6 A Yes, sir.

7 Q And you secured this film by Mr. Russo, right?

8 A Yes.

9 Q And you showed the movie to the people who were in  
10 attendance to watch the movie, correct?

11 A Yes.

12 Q And the movie was about, among other things, whether the  
13 IRS has the legal right to collect taxes, right?

14 A Yes.

15 Q And you knew what the movie was about, didn't you?

16 A No.

17 Q You didn't know what the movie was about?

18 A No.

19 Q So you arranged to get the movie from the people who have  
20 the movie, you bring your projection equipment and you,  
21 yourself, were the projector, correct?

22 A Yes.

23 Q You operated the projection equipment to show the movie  
24 that you had gotten and had delivered to V Week, right?

25 A Yes.

Loperfido - cross - Agnifilo

3420

1 Q And you said that you were concerned by the content of  
2 the movie?

3 A Yes.

4 Q Did you stop the movie?

5 A No.

6 Q And you said that you wanted to have debate after the --  
7 discussion after the movie?

8 A Discussion, yes.

9 Q Okay. Wasn't the purpose of the movie to foster debate  
10 around these issues?

11 MR. LESKO: Objection.

12 THE COURT: That's sustained.

13 BY MR. AGNIFILO:

14 Q Why -- why did you get the movie? You --

15 A I was asked to get the movie.

16 Q Who asked you?

17 A Ms. Russell.

18 Q And wasn't -- didn't -- weren't you involved in  
19 conversation with Ms. Russell that this would be an  
20 interesting topic of debate?

21 MR. LESKO: Objection.

22 THE COURT: You may answer that.

23 A I don't believe I did. They asked me -- you know, it was  
24 something I did often for a number of years before that and --  
25 and having a full summer film series in a park. I had the

Loperfido - redirect - Lesko

3421

1 ability to get the film, they asked me if I could and I did.  
2 I didn't think much more of it, other than that it was  
3 entertainment for that evening.

4 Q Right, but you arranged for the film -- you arranged in  
5 every manner for the film to be shown. You got the movie,  
6 itself, correct?

7 A Yes.

8 Q You showed the movie on your projection equipment,  
9 correct?

10 A Yes.

11 MR. AGNIFILO: Your Honor, I have nothing else at  
12 this point. Thank you.

13 THE COURT: Redirect?

14 MR. LESKO: Briefly, Your Honor.

15 THE COURT: All right.

16 REDIRECT EXAMINATION

17 BY MR. LESKO:

18 Q Good morning.

19 A Good morning.

20 Q I just have, I think, a couple of questions.

21 On cross-examination you were asked about meetings  
22 involving this large loss, this large trading loss.

23 Do you remember that?

24 A Yes, sir.

25 Q Okay. So -- and I think you said you weren't involved in

Loperfido - redirect - Lesko

3422

1 the actual trade, itself, is that right?

2 A That's correct.

3 Q So what was your role with respect to that -- how large  
4 was the loss again?

5 A It was --

6 MR. AGNIFILO: Objection, Your Honor.

7 THE COURT: You may answer.

8 A It was many millions of dollars. It was -- it was a big  
9 sum and the question was, how does -- how do the entities,  
10 whichever entity it was that it was booked under, would handle  
11 it.

12 Q And -- and handle it, are you talking about the tax  
13 consequences --

14 A Yes, sir.

15 Q -- of the loss?

16 A Yes, sir.

17 Q Do you know where that money originally came from?

18 A I was told it came from the Bronfmans.

19 Q And you talked about some of the helpful aspects of the  
20 intensive that you attended, on cross-examination, do you  
21 remember that?

22 A Yes.

23 Q Were there unhelpful aspects of the intensives?

24 A I can't -- I know there were. I can't tell you. I don't  
25 remember.

Loperfido - redirect - Lesko

3423

1 Q Okay.

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

3 THE COURT: Anything else?

4 MR. AGNIFILO: Nothing, Judge.

5 THE COURT: All right, the witness is excused. You  
6 may stand down, sir.

7 (Witness steps down and exits the courtroom.)

8 THE COURT: Can we have a sidebar?

9 (Sidebar held.)

10

11 (Continued on following page.)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Sealed Sidebar - By Order of the Court

3424

1 (The following sidebar occurred outside the hearing  
2 of the jury.)

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

Sealed Sidebar - By Order of the Court

3425

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

[Redacted content]

(Sidebar concluded.)

(Continued on the following page.)



1 (In open court - jury present.)

2 THE COURT: All right, members of the jury, we have  
3 a little bit of housekeeping to do. So rather than do it at  
4 sidebar and have you just sit here, I am going to excuse you  
5 to the jury deliberation room for a few minutes and call you  
6 back in when we have finished what we need to do.

7 All rise for the jury.

8 (Jury exits.)

9 THE COURT: Please be seated everyone.

10 All right, I have a letter from the defense  
11 regarding some of the evidence that the Government proposes to  
12 introduce with the next witness -- who is?

13 MS. HAJJAR: Special Agent Maegan Rees, Your Honor.

14 THE COURT: Okay. So let's go over the objections.  
15 Let's start with regard to Government Exhibit 1400.

16 Just tell me, in a nutshell, what the objection  
17 is --

18 MR. AGNIFILO: Yes.

19 THE COURT: -- so that we have the context on the  
20 record before I hear from the Government.

21 MR. AGNIFILO: Right. So the first is authenticity.

22 I don't feel that the Government, in the absence of  
23 a witness testifying, that this person was involved in these  
24 communications can authenticate 1400 sufficiently under the  
25 Rules of Evidence.

1 THE COURT: Okay.

2 MR. AGNIFILO: So the first ground is authenticity.

3 The second ground is hearsay; that many of the  
4 assertions in these written communications are assertions of  
5 fact that I believe are being offered for the truth of the  
6 facts in the statement. We don't have the ability to  
7 cross-examine this witness. This witness is an unsworn  
8 witness. These are statements being offered for the truth, so  
9 the second basis is hearsay.

10 The third is the nature, the size, the amount of the  
11 material and the nature of the material I think gives rise to  
12 a due process issue, which we raised in writing. I do not  
13 argue, because I cannot argue under Crawford that these  
14 statements are testimonial. They are not testimonial, but  
15 without a witness to give context -- I mean, I'm not going to  
16 get into the details. I get into the details with certain  
17 sections in the written memorandum, you know, but these are  
18 intimate, personal communications that we don't know are  
19 intentions, daydreamings, musings, plans, and without my  
20 ability to cross-examine the person saying these things, I  
21 feel the evidence is not only unreliable under traditional  
22 Rules of Evidence standards, but also since we're talking  
23 about hundreds and hundreds of pages of these very intimate  
24 conversations without any ability to cross-examine them, I  
25 think it gives rise to a due process issue that, given the

1 nature of the materials, given the amount of the materials,  
2 and given the fact that this is a witness that the Government  
3 could have endeavored to call. It might not have been as easy  
4 as some other witnesses, but they could have endeavored to  
5 call the witness. They could have put in place mechanisms  
6 that are available to prosecutors, federal prosecutors, to  
7 have a witness come to court and testify. And I don't believe  
8 they put in motion any of those things and they're trying to  
9 just put in these communications without me cross-examining a  
10 witness.

11 THE COURT: All right, thank you.

12 Yes.

13 MS. HAJJAR: Your Honor, just for background.  
14 Special Agent Rees has reviewed thousands of pages of  
15 communications between the defendant and Camila and that's  
16 what is at issue here. And these communications were obtained  
17 by search warrant from two accounts, the vicibaby@gmail.com  
18 account and the Camila's castle account. The Camila's castle  
19 account is the one that the defendant is objecting to; but the  
20 Camila's castle account, like the vicibaby account --

21 THE COURT: The Camila -- what is the name of the  
22 account?

23 MS. HAJJAR: Camilascastle@yahoo.com is the second  
24 e-mail address.

25 THE COURT: Uh-hum.

1 MS. HAJJAR: This e-mail address was used to  
2 surreptitiously communicate between the defendant and Camila.  
3 They're the same type of communications, they're the same  
4 subject matter of communications, but these communications  
5 were in 2009 when Camila was 19 years old, and they reference  
6 her being a good slave, an obedient slave. One of them  
7 attaches a -- forwards an e-mail from KeithRaniere@yahoo.com.  
8 The tenor and the type of messages are exactly the same as the  
9 other hundreds of messages that Special Agent Rees has  
10 reviewed and will testify to and to which the defendant is not  
11 objecting. There is simply no basis that these -- these  
12 e-mails would be different in kind from the remainder.

13 THE COURT: So with regard to -- let's take it one  
14 thing at a time.

15 In terms of authenticity of the e-mails, what's your  
16 answer to that?

17 MS. HAJJAR: They speak for themselves -- a few  
18 things, Your Honor, but the first is the face of the  
19 communications themselves. One of them, for example, is a  
20 forward from KeithRaniere@yahoo.com. Camila sends that  
21 forward to the defendant and says -- well, sends it to the  
22 same e-mail address. So it's the e-mail address that's used  
23 where there are chains of e-mails. It's used to  
24 surreptitiously communicate between the defendant, the same  
25 e-mail address between the defendant and Camila.

## Proceedings

3430

1           And so you see a chain of e-mails that are clearly  
2 from one person to another where the defendant is responding  
3 to something Camila wrote, but they're all from the same  
4 Camila's castle e-mail address. And in one e-mail there is  
5 even a reference to: This is the account that you wanted me  
6 to communicate with, the private account, so I don't e-mail  
7 your other accounts. And so that's made very clear from the  
8 content of the messages themselves.

9           THE COURT: Who sent that message?

10           MS. HAJJAR: Camila sent the message to -- I mean,  
11 presumably Camila sent that message to the defendant because  
12 these are back-and-forth between Camila and defendant. So she  
13 makes --

14           THE COURT: Are you submitting Camila's statements  
15 for the truth of the matter asserted?

16           MS. HAJJAR: They're to provide context, but many of  
17 these messages, Your Honor, are the defendant's messages.  
18 They're clear from the --

19           THE COURT: Well, the defendant's messages would  
20 come in --

21           MS. HAJJAR: Yes. And so this back-and-forth --

22           THE COURT: -- as statements of a party opponent.  
23 So they are not subject to the hearsay rule.

24           MS. HAJJAR: Exactly, Your Honor.

25           THE COURT: But Camila's messages are hearsay.

1 MS. HAJJAR: They provide --

2 THE COURT: Technically, correct? I mean it is an  
3 important technical issue, and so the truth of the matter  
4 asserted, if they are being submitted for the truth of the  
5 matter asserted, how would they come in?

6 MS. HAJJAR: Well, a few things Your Honor.  
7 They're not really being --

8 THE COURT: If they are coming in simply to provide  
9 context for Keith Raniere's statements, that's one thing. But  
10 if they're coming in to prove something, then they're hearsay.

11 MS. HAJJAR: They're to provide -- they're exactly  
12 as Your Honor is describing, they're providing context for the  
13 defendant's responses. And what's more, the content of the  
14 messages aren't ones that are -- they're things like, you  
15 know, I love you, I will be a good slave for you. They're not  
16 things that we're offering -- there is no truth to that  
17 matter, it's just the fact that it was sent at this time to  
18 the defendant and the defendant responds, and they're exactly  
19 the same type of messages that we are admitting with respect  
20 to the vicibaby@gmail.com account.

21 MR. AGNIFILO: Here 's the problem is that one of  
22 the specific exhibits that they want to put in, basically, is  
23 Camila saying something like: It's been thirty full moons  
24 since we've been together. And there's no response. I'm  
25 talking about Exhibit 1701.

1           So I guess I'm just thinking ahead a little bit, but  
2 there are things in here that are only relevant if they're  
3 offered for the truth, that the contextual --

4           THE COURT: All right, I understand your point.

5           What about that? If it's something that, if there  
6 is a statement by Camila in one of these e-mails that is not  
7 responded to by Mr. Ranieri, then what other purpose would  
8 there be than to provide it for the truth of the matter  
9 asserted?

10           MS. HAJJAR: In part, Your Honor, for the precise  
11 purpose that Mr. Agnifilo is challenging the authenticity of  
12 this entire e-mail account. They are clearly communications  
13 between Camila and the defendant, and some of the messages  
14 sent by Camila make that clear based on the context of  
15 those -- of the messages, themselves. And so the argument  
16 that they're both inauthentic and can't be shown, but that you  
17 shouldn't look at those other messages to provide context, not  
18 for the truth, but to provide context and to establish who  
19 is -- who is -- who are these messages between is extremely  
20 significant, Your Honor.

21           THE COURT: All right. Okay, let's move on to the  
22 next issue, the issue about the wrists. Is there an issue  
23 about wrists?

24           MR. AGNIFILO: Oh, yes, yes, yes. I didn't hear  
25 what Your Honor said.

Proceedings

3433

1 THE COURT: Yes.

2 MR. AGNIFILO: I don't see, without someone  
3 testifying as to what had happened, how that is admissible. I  
4 mean it's a photograph of an injury that seems to be  
5 consistent with a cut of some sort. And --

6 THE COURT: All right, what about that?

7 MS. HAJJAR: So --

8 THE COURT: Why should that come in? Unless you  
9 have someone who is going to come in and say, I'm the doctor  
10 and I examined this person in the Emergency Room and there  
11 were cuts on her wrists and there is some paperwork that was  
12 being provided where the doctor wrote down that she said this  
13 is what happened; why is this coming in?

14 MS. HAJJAR: I just want to make clear, Your Honor,  
15 that these exhibits come from the vicibaby@gmail.com account.  
16 The reason why that's significant is the defendant is not  
17 objecting to the messages that accompany these images, and the  
18 messages, themselves, make clear what this injury is. So  
19 there are messages contemporaneous with this -- with these  
20 photographs.

21 THE COURT: All right. Well, when I see the  
22 messages I'll let you know about that.

23 MS. HAJJAR: Okay, Your Honor.

24 THE COURT: I am not going to rule on it until I see  
25 the messages.



1 MS. HAJJAR: May I just note one thing, Your Honor?

2 THE COURT: If I can provide that information to  
3 you, what would you like to know?

4 MS. HAJJAR: I just want to note that the foundation  
5 for these -- Lauren Salzman testified that the defendant gave  
6 an explanation for the creation of DOS that had something to  
7 do with Camila's suicide attempt. This is a theme that comes  
8 up in the messages themselves, that DOS is somehow created or  
9 tied to this injury. So I even believe Mr. Agnifilo may have  
10 alluded to that in his opening statement, that this is the  
11 explanation for the creation of DOS. And so the timing of  
12 this -- of the messages relating to this and the images,  
13 themselves, are significant to showing that -- to showing that  
14 that explanation is not true.

15 MR. AGNIFILO: So I think that we have to separate  
16 out what is a valid or invalid theme with admissibility. I  
17 mean, if the evidence isn't admissible, it's not admissible  
18 regardless of whether it fits into some theme or even if it's,  
19 in fact, true or not.

20 And my concern with these photographs is there's  
21 also just a 403 issue. I mean it's --

22 THE COURT: Yes, I understand that. I just want to  
23 see the e-mails before I rule on it. I think it is unlikely  
24 that it is going -- that the pictures are needed and, as long  
25 as the information is being provided by admissible evidence,

1 you may have to do without the pictures. We've had plenty of  
2 pictures for this jury. So, the 403 issue is the one that I  
3 am concerned about. Okay? So just bear that in mind.

4 What else?

5 MR. AGNIFILO: So, one of the other objections is  
6 they want to put in a photo of the ultrasound.

7 THE COURT: Yes.

8 MR. AGNIFILO: Which I think is the same 403 issue  
9 as the injuries to the wrist.

10 THE COURT: Well, an ultrasound is a lot different  
11 from pictures of someone who slit her wrists.

12 What is the ultrasound for?

13 MS. HAJJAR: The ultrasound and the pregnancy test,  
14 Your Honor, are accompanied by meta data which show exactly  
15 when they're being sent and it is a lead up to a significant  
16 event in -- for purposes of this.

17 THE COURT: And that was all in the materials at the  
18 e-mail?

19 MS. HAJJAR: Obtained from Google by -- by search  
20 warrant, Your Honor, for the vicibaby@gmail.com account.

21 THE COURT: All right, well, you can put that in.

22 Anything else?

23 MR. AGNIFILO: Yes, Judge.

24 In terms of the 1700 series.

25 THE COURT: Yes.

1 MR. AGNIFILO: They're trying to elicit a number of  
2 e-mails that Lauren Salzman is having with different members  
3 of Cami's family, and the problem now is Lauren Salzman has  
4 come and gone. I can't cross-examine anybody in regard to  
5 this and if they wanted to put these in, they should have put  
6 them in through Lauren Salzman. And so I don't know why they  
7 should be able to do it now that she's off the stand.

8 MS. HAJJAR: Your Honor, I truly do not understand  
9 this argument. If Lauren Salzman had not testified, we would  
10 be able to put these e-mails in as statements of  
11 co-conspirators. There is ample foundation for that. Daniela  
12 has testified. Lauren Salzman has testified. We don't need  
13 to have a witness that was present during communications if  
14 the foundation is set for co-conspirator's statements, which  
15 these plainly are; they're very similar to the ones that have  
16 already been admitted.

17 THE COURT: All right, they can come in.

18 MR. AGNIFILO: Just --

19 THE COURT: They can come in.

20 MR. AGNIFILO: Some of the e-mails are just between  
21 Cami and Lauren. I don't see how any theory that shows that's  
22 a co-conspirator statement.

23 MS. HAJJAR: Your Honor --

24 THE COURT: Well, because she is a co-conspirator.  
25 You know, I am not going to split hairs over how much of a

1 co-conspirator she is.

2 That's it.

3 MR. AGNIFILO: Sorry, then we get back to problems  
4 of first names, last names. If she is a co-conspirator, we  
5 haven't been treating her as a co-conspirator, so I renew my  
6 objection --

7 THE COURT: Who?

8 MR. AGNIFILO: Cami.

9 THE COURT: I thought you said -- is Cami a  
10 co-conspirator?

11 MS. HAJJAR: Your Honor, she was involved -- as  
12 Daniela and Lauren Salzman testified, she was involved in the  
13 confinement of Daniela in the room and so, in that respect,  
14 she was assisting in a criminal scheme. She is, however, a  
15 victim in other respects, as Your Honor knows, and so that's  
16 why her identity is being protected.

17 THE COURT: Well, in order to protect Daniela's  
18 identity --

19 MS. HAJJAR: Yes.

20 THE COURT: -- you can't use the last name for  
21 Camila. I mean, it is just a fact that -- you know, this is a  
22 choice that, apparently, Mr. Ranieri made to engage in this  
23 behavior with three sisters. That is a creation of your  
24 client, it is not a creation of the Government, so I am not  
25 going to have Camila's last name, even though she is a

1 co-conspirator, or alleged to be a co-conspirator, disclosed  
2 because that would end up disclosing the name of a victim, or  
3 alleged victim.

4 So we are not going to do that. Just that's life,  
5 you know. That was Mr. Ranieri's choice, that wasn't the  
6 Court's choice.

7 Anything else?

8 MR. AGNIFILO: Nothing from us.

9 THE COURT: All right, let's bring the jury back.

10 (Pause.)

11 (Jury enters.)

12 THE COURT: Please be seated, everyone.

13 The Government may call its next witness.

14 MS. HAJJAR: Thank you, Your Honor.

15 The Government calls Special Agent Maegan Rees.

16 (Witness enters the courtroom and assumes the  
17 stand.)

18 THE COURTROOM DEPUTY: Please raise your right hand.

19 Do you solemnly swear the testimony you shall give  
20 to the Court will be the truth, the whole truth, and nothing  
21 but the truth, so help you God?

22 THE WITNESS: I do.

23 THE COURTROOM DEPUTY: Please have a seat. Please  
24 state and spell your full name for the record.

25 THE WITNESS: Maegan Rees, M-A-E-G-A-N, R-E-E-S.

Proceedings

3439

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

THE COURT: You may inquire.  
MS. HAJJAR: Thank you, Your Honor.  
  
(Continued on the following page.)

Rees - direct - Hajjar

3440

1 M A E G A N R E E S,

2 called as a witness by the Government, having been  
3 first duly sworn/affirmed by the Courtroom Deputy, was  
4 examined and testified under oath as follows:

5 DIRECT EXAMINATION

6 BY MS. HAJJAR:

7 Q Good morning, Agent Rees.

8 A Good morning.

9 Q Where do you work?

10 A I work for the Federal Bureau of Investigation.

11 Q And how long have you been a special agent with the FBI?

12 A I have been an agent for a little more than a  
13 year-and-a-half.

14 Q What is your educational background?

15 A I have a Bachelor of Arts in international relations and  
16 a Master's in public policy.

17 Q And what did you do after getting your Master's degree?

18 A I spent some time working for a non-profit focusing on  
19 education policy and then I designed war games and exercises  
20 for a defense contractor, Booz Allen Hamilton.

21 Q Did you join the FBI after that?

22 A I did.

23 Q Are you assigned to a particular unit or squad?

24 A I am. I am currently assigned to the Public Corruption  
25 Squad.

SAM

OCR

RMR

CRR

RPR

Rees - direct - Hajjar

3441

1 Q And were you assigned to any other squads within the FBI?

2 A I have. I spent time on a squad focused on background  
3 investigations, and then a squad focused on civil rights.

4 Q Did there come a time where you learned of an  
5 investigation into Keith Raniere?

6 A Yes, approximately May 2018.

7 Q And did you participate in that investigation in any way?

8 A I did. My role was primarily to support the case agents  
9 and I did that primarily through reviewing electronic  
10 evidence.

11 Q Were you asked to review certain materials in connection  
12 with your testimony today, Agent Rees?

13 A I was.

14 Q And what materials were those?

15 A I primarily reviewed the vicibaby@gmail.com account, as  
16 well as camilascastle@yahoo.com and KeithRaniere@yahoo.com.

17 Q Special Agent Rees, I want to show what's in evidence as  
18 Government's Exhibit 1588-R.

19 Do you see that exhibit, Agent Rees?

20 A I do.

21 Q And the top, where it is below Google subscriber  
22 information, can you read the name and e-mail address that's  
23 listed?

24 A The name is Camila. The e-mail address is  
25 vicibaby@gmail.com.



Rees - direct - Hajjar

3442

1 Q Now, are you aware if a search warrant was obtained for  
2 this account vicibaby@gmail.com?

3 A I am.

4 Q And I want to show you a disk.

5 MS. HAJJAR: May I show something to the witness for  
6 identification only, Your Honor?

7 THE COURT: Go ahead.

8 BY MS. HAJJAR:

9 Q All right, Agent Rees, I am showing you a disk that's  
10 marked with the following: Government Exhibits 301, 301-R,  
11 302, 302-R, 305 to 308, 305 to 308-R, 310, 310-R, 527 to 534,  
12 1145, 1147 to 1158, 1160 to 1162, 1164 to 1166, 1183 to 1191,  
13 and 1701 to 1737, 1739, 1742 to 1746, 1748 to 1756, 1764, 1767  
14 to 1777, 1779, 1781 to 1782, 1784 and 1789.

15 Have you reviewed this disk that contains these  
16 exhibits?

17 A I have.

18 Q And did you initial the disk, the disk cover?

19 A Yes, I have.

20 Q And was the information contained in these exhibits  
21 received from Google in response to the search warrant for  
22 vicibaby@gmail.com?

23 A That's correct.

24 MS. HAJJAR: Your Honor, at this time the Government  
25 moves into evidence those exhibits. I can read them again

Rees - direct - Hajjar

3443

1 into the record, but the exhibits that I just read.

2 MR. AGNIFILO: Can I have one second to ask  
3 Ms. Hajjar a question?

4 THE COURT: Sure.

5 (Pause.)

6 MR. AGNIFILO: We have no objection.

7 THE COURT: All right, Government Exhibits 301,  
8 301-R, 302, 302-R, 305 to 308, 305-R to 308-R, 310, 310-R, 527  
9 to 534, 1112 to 1123, 1145, 1147 to 1158, 1160 to 1162, 1164  
10 to 1166, 1183 to 1191, 1764, 1767 to 1177, 1179, 117 -- I'm  
11 sorry, 1781 to 1782, 1784 and 1789 are received in evidence.

12 MS. HAJJAR: Thank you, Your Honor.

13 (Government's Exhibits 301, 301-R, 302, 302-R, 305  
14 to 308, 305-R to 308-R, 310, 310-R, 527 to 534, 1145, 1147 to  
15 1158, 1160 to 1162, 1164 to 1166, 1183 to 1191, and 1701 to  
16 1737, 1739, 1742 to 1746, 1748 to 1756, 1764, 1767 to 1777,  
17 1779, 1781 to 1782, 1784 and 1789 were received in evidence.)

18 MS. HAJJAR: Just one note, Your Honor, the 1112 to  
19 1123, based on Your Honor's recent ruling, the Government did  
20 not offer. That is just the only --

21 THE COURT: I see, all right. Okay, so those  
22 exhibits are not admitted.

23 MS. HAJJAR: Thank you, Your Honor.

24 THE COURT: All right, thank you for clarifying  
25 that. Thank you.

Rees - direct - Hajjar

3444

1 BY MS. HAJJAR:

2 Q Now, Agent Rees, did some of the materials you reviewed  
3 contain text files containing what appear to be WhatsApp chats  
4 between Camila and other WhatsApp users?

5 A That's correct.

6 Q Are you familiar with WhatsApp?

7

8 (Continuing on the following page.)

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar

3445

1 (Continuing)

2 Q And can you -- is there a function WhatsApp whereby you  
3 can export chats?

4 A There is.

5 Q Can you explain that to the jury, please?

6 A When a user is using WhatsApp within the chat page, at  
7 the top left corner you will see a phone number or a contact  
8 or a thread name for that chat. If the user clicks on that  
9 name or phone number, they are provided a menu of functions.  
10 One of those functions would be to export the chat. If  
11 selected, the WhatsApp will fetch the data of the chat and  
12 provide the user the ability to text it or e-mail the chat.

13 Q And as an example, did you export chats from your phone  
14 just to test that process?

15 A I did.

16 MS. HAJJAR: Your Honor, I apologize. May I have  
17 one moment to confer with Defense Counsel?

18 THE COURT: Sure.

19 MS. HAJJAR: Thank you.

20 (Pause in the proceedings.)

21 Q Agent Rees, I want to show you what's been marked for  
22 identification only as Government Exhibit 377 and 378.

23 Do you recognize these exhibits?

24 A I do.

25 Q What are they?

Rees - direct - Hajjar

3446

1 A They are an example of a WhatsApp chat. The image that  
2 is on top --

3 Q Sorry. Are these the screen shots that you, yourself  
4 took as an example?

5 A That's correct.

6 MS. HAJJAR: Your Honor, the Government offers  
7 Government Exhibit 377 and 378 only as aids to the jury.

8 MR. AGNIFILO: We don't object.

9 THE COURT: All right.

10 Exhibits 377 and 378 are admitted into evidence as  
11 aids to the jury.

12 (Government's Exhibit 377 and 378 received in  
13 evidence.)

14 (Exhibit published.)

15 BY MS. HAJJAR:

16 Q I'm showing you Government's Exhibit 378.

17 Can you just explain what this is, Agent Rees?

18 A So as I mentioned, when -- if you select the icon in the  
19 top left corner in this case where it says dinner plans, that  
20 was the name of the chat thread, the chat will provide a menu  
21 of functions or features. This is a screen shot of that menu.

22 Q And this is a screen shot from your own phone? This is a  
23 test of what the WhatsApp?

24 A That's correct.

25 Q Okay. And if you were to open WhatsApp on your phone, is

Rees - direct - Hajjar

3447

1 this what it would look like?

2 A That's correct.

3 Q And this user here, is that you?

4 A That's correct.

5 Q And this?

6 A Is the person that I'm communicating with.

7 Q And the export chat feature, is this the feature you were  
8 just referring to?

9 A That's correct.

10 MS. HAJJAR: Turning to the second page.

11 (Exhibit published.)

12 Q Can you just explain to the jury what this depicts, the  
13 second page?

14 A This is a screen shot of the text message communications  
15 that I had with the other user.

16 Q So what happens after you have these communications and  
17 you hit export chat?

18 A The WhatsApp will fetch the raw data of the  
19 communication. The user will be provided an option to include  
20 media or not include media and then, you are able to either  
21 text it or e-mail it.

22 MS. HAJJAR: And showing you Government Exhibit 377.

23 (Exhibit published.)

24 Q Can you explain what this is?

25 A That is a screen shot of the raw data that was exported.

Rees - direct - Hajjar

3448

1 Q So after you hit export chat, this -- this is -- this  
2 file is created?

3 A That's correct.

4 Q How did you receive this file?

5 A Via e-mail.

6 Q And so the content of this document, is it similar to --  
7 is it the same as the content of the chats between you and  
8 user KB?

9 A It is the same, except I did opt to omit the media.  
10 Therefore, you see image omitted.

11 Q Can you explain to the jury what you mean by that? Just  
12 go these chats a little bit.

13 A So if we had looked at the original screen shot of the  
14 chat, there was a picture of pizza. When I exported it, I had  
15 the option to include the images or omit them. I opted to  
16 omit them. So this e-mail includes all the raw data of the  
17 chat, except the actual image.

18 Q Okay. And here, where -- at the top left-hand corner  
19 where it says 6/2/19, were these the times and dates  
20 associated with the chats that you were testing?

21 A That's correct.

22 Q Okay.

23 MS. HAJJAR: Your Honor, can we switch the  
24 PowerPoint function.

25 THE COURT: Is that it?

Rees - direct - Hajjar

3449

1 MS. HAJJAR: Yes, Your Honor.

2 Q So I'm showing you what's in evidence --

3 MS. HAJJAR: Can we publish it to the jury,  
4 Your Honor? This is all in evidence.

5 (Exhibit published.)

6 BY MS. HAJJAR:

7 Q I'm showing you what's in evidence as Government  
8 Exhibit 1702.

9 What is this exhibit?

10 A This is an e-mail sent from Camila to unknown user at --  
11 my apologies. This is a little blurry.

12 Q It's hard to read.

13 THE COURT: Can you zero in on that portion of it  
14 and enlarge it?

15 MS. HAJJAR: Let me see, Your Honor.

16 (Pause in the proceedings.)

17 THE COURT: All right. Thank you.

18 Q So Agent Rees, this is an e-mail from the Camila the  
19 vicibaby@gmail.com account?

20 A That's correct.

21 Q And what is the date of this e-mail?

22 A June 4th, 2008.

23 Q And is there an attachment?

24 A There is.

25 Q Have you reviewed the attachment?



Rees - direct - Hajjar

3450

1 A I have.

2 Q So turning to the next page.

3 (Exhibit published.)

4 Q Can you describe what the attachment appears to be?

5 A The attachment appears to be a scan of a Mexican passport  
6 as well as a border crossing identification card.

7 Q And what's the name associated with both of these  
8 documents?

9 A Camila.

10 Q What is the date of birth associated with each of these  
11 documents?

12 A Both documents show March 1st, 1990, date of birth.

13 Q And are these documents for -- of Camila, they're  
14 Mexican -- they're documents for a Mexican national?

15 A That is correct.

16 Q What is the date of issue on the passport?

17 A May 23rd, 2008.

18 Q So based on Camila's birthday of March 1st, she's  
19 approximately -- she's 18 years old?

20 A That's correct.

21 Q So showing you what's in evidence as Government  
22 Exhibit 1743.

23 (Exhibit published.)

24 Q Looking at the first page, can you tell who this e-mail  
25 is from?

Rees - direct - Hajjar

3451

1 A This e-mail is from Cami.

2 Q And who is it to?

3 A Camila@yahoo.com.

4 Q And what's the date on this e-mail?

5 A December -- is there a way you could zoom in?

6 Q Yes.

7 A December 7th, 2014. Yes, December 7th, 2014.

8 Q And the subject line?

9 A WhatsApp chat with C.

10 Q Is there an attachment to this e-mail?

11 A There is.

12 Q I'm going to turn to the attachment -- I'm sorry, what's  
13 the attachment called?

14 A WhatsApp chat with Robbie Chiappone.

15 Q Turning to the next page.

16 Agent Rees, is this the attachment to that e-mail?

17 A Yes, it is.

18 Q Can you describe what the attachment contains?

19 A It contains a WhatsApp chat between Camila and Robbie  
20 Chiappone.

21 Q Similar to the WhatsApp chats that you yourself exported  
22 from your phone?

23 A Yes, that's correct.

24 Q They have the date, the name, the time the messages were  
25 sent?

Rees - direct - Hajjar

3452

1 A That's correct.

2 Q And there are many chats included in this attachment;  
3 right?

4 A Yes.

5 Q All right. So turning to what's in evidence as  
6 Government Exhibit 1744, the first page.

7 (Exhibit published.)

8 Q Again, can you tell who this e-mail is from?

9 A It's from Camila@yahoo.com.

10 Q Who is it to?

11 A Camila@yahoo.com and vicibaby@gmail.com.

12 Q Now, when you exported messages from your phone, it came  
13 via e-mail to you?

14 A That's correct.

15 Q And the WhatsApp chat were an attachment to that e-mail?

16 A That's correct.

17 Q Okay. Can you read when this e-mail was sent and the  
18 subject line?

19 A It was sent December 10th, 2014 and the subject is  
20 WhatsApp chat with Unknown Caller.

21 Q And is there a text file attached to it?

22 A There is.

23 Q And what is that? What is it called?

24 A WhatsApp chat with Unknown Caller.

25 Q Have you reviewed the attachment to Government

Rees - direct - Hajjar

3453

1 Exhibit 1744?

2 A I have.

3 Q Can you describe what it is and its length?

4 A Its length is over a thousand pages -- hundreds of pages  
5 worth of text message conversations between Camila and a user  
6 known as Unknown Caller.

7 Q And so looking at the first page of the text file that's  
8 attached to this particular exhibit, these are messages  
9 between Camila and Unknown Caller that you reviewed?

10 (Exhibit published.)

11 A That's correct.

12 Q Just going through a few of these. Again, Agent Rees,  
13 you reviewed hundreds of pages of these text messages?

14 A That's correct.

15 Q These are just the first few pages?

16 A Yes.

17 Q Okay. So turning to page 139 of Government Exhibit 1744.

18 (Exhibit published.)

19 Q Can you read the message sent by Camila on October 31st  
20 at 1:25 p.m.?

21 A Not only were you supposed to be my partner and my love,  
22 but you are also Vanguard.

23 Q Now turning to page 239 of Government Exhibit 1744.

24 (Exhibit published.)

25 Q Can you read the highlighted text, please?

Rees - direct - Hajjar

3454

1 A Camila: I don't want to go without a fight.

2 Unknown Caller: I don't understand. What's right is you  
3 build a conscience, not what you are doing. You are not  
4 fighting in the right direction for building a conscience or  
5 giving me what I deserve. I have earned what I deserve from  
6 you. Ask yourself, does Keith deserve this from his partner.

7 Q And these messages were sent on November 27th at  
8 12:45 p.m.?

9 A That's correct.

10 Q Have you reviewed similar e-mails containing WhatsApp  
11 messages between Camila and the user identified as Unknown  
12 Caller?

13 A Yes, I have.

14 Q And are these representative of the types of chats that  
15 you reviewed?

16 A Yes, they are.

17 MS. HAJJAR: I'm showing you what's in evidence as  
18 Government Exhibit 1782.

19 (Exhibit published.)

20 MS. HAJJAR: Maybe we can zoom in on the text.

21 Thank you.

22 Q Is this another e-mail attaching a text file called  
23 WhatsApp chat with Unknown Caller?

24 A Yes, it is.

25 Q It looks like there's a chain of e-mails. Can you

Rees - direct - Hajjar - WhatsApp Chats

3455

1 describe what is on the first page of Government Exhibit 1782?

2 A It appears that the first e-mail was sent on  
3 December 28th in which Camila@yahoo.com wrote the first  
4 e-mail. That e-mail was then forwarded from Camila@yahoo.com  
5 to KeithRaniere@yahoo.com. And then forwarded again from  
6 Keith Raniere to vicibaby@gmail.com on January 29th, 2016.

7 MS. HAJJAR: I'm sorry, Agent Rees. Is your  
8 microphone on?

9 THE WITNESS: It is.

10 Q And this again attaches chats between Vicibaby and  
11 Unknown Caller?

12 A That's correct.

13 MS. HAJJAR: So I want to look at a few more of  
14 these e-mails. Let's look at Government's Exhibit 1779.

15 (Exhibit published.)

16 Q Looking at the top of this slide. Is that an excerpt of  
17 the cover e-mail attaching the text file?

18 A Yes, it is.

19 Q And the bottom of this slide, is it the excerpt of the  
20 attached text file on page 49 of this attachment?

21 A Yes, it is.

22 MS. HAJJAR: I'm going to ask you to read the  
23 messages sent by Vicibaby and I will read the messages sent by  
24 Unknown Caller.

25 (The following WhatsApp chats were read into the

Rees - direct - Hajjar - WhatsApp Chats

3456

1 record.)

2 A May 24th, 2015 at 10:02 p.m.

3 I sent you an e-mail. It is not urgent or  
4 important, just sweet.

5 Q I haven't received anything.

6 A Really? KeithRaniere@yahoo.com?

7 Q Yes...resend?

8 A I sent you two other e-mails on Friday. Did you get  
9 those?

10 I just resent.

11 Q Have not received anything from you Friday either.

12 MS. HAJJAR: So turning to the next slide, the same  
13 exhibit, page 237.

14 (Exhibit published.)

15 Q Again, is this an excerpt of the attached text file to  
16 Government Exhibit 1779?

17 A Yes, it is.

18 Q Can you please read the text highlighted in blue.

19 A September 8th, 2015, 8:53 p.m.

20 I am trying to decide what to do the rest of the  
21 Night...Should I go out meet people...should I go get a tattoo  
22 that says I heart Keith?

23 Q Read? Love us? I miss you honey!

24 MS. HAJJAR: All right. I am going to turn to the  
25 next slide, which is in evidence as Government Exhibit 310-R.

Rees - direct - Hajjar - WhatsApp Chats

3457

1 (Exhibit published.)

2 Q Can you read the attachment which is at the top of this  
3 slide, the cover e-mail at the top of the slide?

4 A So the e-mail is from Cami to Camila@yahoo.com dated  
5 August 6th, 2016.

6 Q And the text at the bottom, is that part of the  
7 attachment to that cover e-mail?

8 A That's correct.

9 Q I'm going to ask you to read the text in blue, please.

10 A October 11th, 2015, 5:40 p.m.

11 Do you want to have babies with me?

12 Q I've told you this...I'm sad you don't remember...

13 A You said yes? Did you say you wanted a litter of Keiths  
14 and Camis?

15 Q Agent Rees, how many pages of these messages have you  
16 personally reviewed?

17 A Approximately 1500.

18 Q And based on your review of these messages, have you been  
19 able to identify the identity of the user Unknown Caller?

20 A Yes.

21 Q And who is that user?

22 A Keith Raniere.

23 MS. HAJJAR: Turning to what's in evidence as  
24 Government Exhibit 301-R. It's the same exhibit that we were  
25 reading from.



Rees - direct - Hajjar - WhatsApp Chats

3458

1 And turning to the -- it's sent from Camila to  
2 Camila and on January 11th, 2015.

3 (Exhibit published.)

4 MS. HAJJAR: So I'll turn to the first page of the  
5 attachment.

6 Q And I'm going to start reading from the top at 3:06 p.m.  
7 on August 18th, 2014.

8 Q Unknown Caller: Are you there?

9 A I'm here. Got your text. Having emotions about it.

10 Q Did you get my normal text? Did you accomplish the  
11 mission by the time you reached Silver Bay?

12 What emotions...We spoke of that before yes?

13 A I don't think so.

14 Q Oh honey I thought you understood and said yes...I  
15 believe it was yesterday...

16 I thought it was just a reminder...What about the  
17 other shift?

18 What happened? Did you fall off the swing?

19 A I don't think I would ever agree to that.

20 Q Yes...It will restore many things...I spoke with  
21 Kristanna in that conversation...Why not agree to such a  
22 strong positive thing?

23 You said you would do anything. This is my first  
24 request. Please do.

25 MS. HAJJAR: Turning to the next slide, which is

Rees - direct - Hajjar - WhatsApp Chats

3459

1 page 3. Actually, skip ahead to -- sorry. I'm going to skip  
2 ahead to page 7.

3 (Exhibit published.)

4 Q Can you read the highlighted portion starting at  
5 11:51 a.m. on August 24, 2014?

6 A Where are you and where will you be?

7 Q In my cabin...Are you free?

8 A Not now, but can be soon. Which cabin?

9 Q Let me know...I can go to ours.

10 A Okay. Will let you know.

11 Know.

12 Update?

13 Till when are you free?

14 Q 4...???

15 4...Small risk around 2 of your sister...

16 A Okay.

17 Q When do you think we can meet my love? I waiting...

18 A I hadn't been able to connect to check in.

19 MS. HAJJAR: Turning to the next slide, which is  
20 page 8 of Government Exhibit 301-R.

21 (Exhibit published.)

22 Q If you can read the highlighted text starting at  
23 2:56 p.m.

24 A I'm waiting to wish you a happy birthday.

25 Q I love love love you so.

Rees - direct - Hajjar - WhatsApp Chats

3460

1                   When can you possibly sneak away? How are we? How  
2 was the module last night?

3                   I wanted to bite your emoticon.

4                   When can we possibly meet so I can taste you?

5 A       What does your schedule look like?

6 Q       I've had a few offers for my birthday...No virgins that I  
7 know of...But I've been intentionally saving it for you...I  
8 want you...

9                   Maybe after 6?

10                  And there's an emoticon.

11                  I avoided the dinner trap...Was hoping we could  
12 meet...But you got trapped!!! Shit!!!

13                  Been trying you on 8.3.

14                  Not sure...I was contemplating your sleeping in the  
15 cabin...But you'd have to be very careful...No lights,  
16 et cetera.

17                  I was trying to reach you for quite some time...sad  
18 face.

19 A       My honey.

20                  I have failed without with technology.

21                  I got trapped without technology, so I couldn't  
22 communicate.

23                  I wanted to run away with you.

24                  I was sad you left with Monkey.

25                  I hope I can see you.

Rees - direct - Hajjar - WhatsApp Chats

3461

1 Q I want so much for you to find a way to go to our cabin  
2 and be there for me tonight without being discovered coming,  
3 going or staying there. This will require resourcefulness...

4 BY MS. HAJJAR:

5 Q Agent Rees, when Camila says I'm waiting to wish you a  
6 happy birthday, what's the date associated with that message?

7 A August 6th, 2014. I'm sorry, August 26th, 2014.

8 Q And I'm turning to the next slide.

9 (Exhibit published.)

10 Q Which is the next slide which is page 9. Camila says at  
11 the top: When can I sneak in?

12 Now if you're careful... so I'm going to skip to the  
13 next slide, which is page 10 of the same exhibit.

14 (Exhibit published.)

15 Q Can you read the text, the highlighted text starting at  
16 1:05 a.m.

17 A I just wanted to check in.

18 I was struggling with some stuff.

19 I heard from Monkey that you are coming to breakfast  
20 with the family.

21 Why am I hearing this from her and not you?

22 Q I am not coming to breakfast...They really want me to do  
23 some meal with them...I just found this out after I spoke with  
24 Simply...I wanted to speak to you about the situation...

25 MS. HAJJAR: Turning to the next slide, which is

Rees - direct - Hajjar - WhatsApp Chats

3462

1 page 17 of the Government's Exhibit 301-R.

2 (Exhibit published.)

3 BY MS. HAJJAR:

4 Q And can you read the highlighted text in blue?

5 A Vball?

6 Time?

7 Q 12:30 or so...Depending on breaks...

8 A Okay. Let me see.

9 Can't promise anything, though.

10 Q It is such a painful, bittersweet thing...The truth of  
11 our life together that could have been made real yet now is  
12 forever a secret and nullified...I love you so much...I'm so  
13 proud to have been your husband for 8.75 years...and shared a  
14 home for 4...Yet I am also so heart broken..

15 When are you home?

16 A Home now.

17 BY MS. HAJJAR:

18 Q Now, at this time when the defendant says 8.75 years,  
19 what's the date attached to that?

20 A September 4th, 2014.

21 Q And are there similar references in the messages you  
22 reviewed to the length of time at which Unknown Caller says  
23 that he's been with Camila?

24 A Yes.

25 Q Okay. What is the -- what is that length the time --

Rees - direct - Hajjar - WhatsApp Chats

3463

1 when did their relationship start based on this message?

2 A Based on this message, eight years from 2014 would be  
3 September of 2006, .75 approximately the end of 2005 or the  
4 early 2006.

5 Q So turning to the next slide, which is page 101 of  
6 Government Exhibit 301-R.

7 (Exhibit published.)

8 Q Okay. Can you read the text highlighted in blue?

9 A That would be good.

10 Q Why else would you feel that way?

11 A I am not disagreeing.

12 Q Besides, you do not need that to do the right thing...  
13 Breaking up is the wrong thing considering that and  
14 8.5 years...Fix first and never use breakup as a  
15 possibility...

16 BY MS. HAJJAR:

17 Q And when -- what year were these messages sent?

18 A 2014.

19 Q Agent Rees, I'm now going to show you what's in evidence  
20 as Government's Exhibit 1701.

21 (Exhibit published.)

22 Q Who is this e-mail from?

23 A Camila.

24 Q And is this the part of the vicibaby@gmail.com account  
25 that you reviewed?

Rees - direct - Hajjar - WhatsApp Chats

3464

1 A That's correct.

2 Q What is the e-mail address that it is to?

3 A It is to kunterre@nycap.rr.com.

4 Q And what's the date?

5 A February 21st, 2008.

6 Q And what's the subject?

7 A Full moon.

8 Q Can you read the text, please.

9 A Full moon is tomorrow and that would make it 30 full  
10 moons that we've been together. Smiley face.

11 Q Agent Rees, do you know how long a full moon cycle lasts?

12 A I believe a full moon is 29.5 days or approximately 30  
13 days.

14 Q And so what's 30 full moons? What's the length of time  
15 that's referring to?

16 A That would be 30 months or approximately two-and-a-half  
17 years.

18 Q And so what is that in terms of the duration of time?  
19 When does that begin in terms of when Camila says we've been  
20 together?

21 A That would take you back to approximately September 2005.

22 Q Agent Rees, I'm going to turn your attention to back to  
23 Government's Exhibit 301, page 32.

24 (Exhibit published.)

25 MS. HAJJAR: Zoom in a little bit.

Rees - direct - Hajjar - WhatsApp Chats

3465

1 I'm going to start reading from the text highlighted  
2 on September 14th, 2014, at 11:08 a.m.

3 Q Keith Raniere: You don't hurt enough or desire me  
4 enough...Postulate-wise you need to feel better, more  
5 strongly, and be more desirous of me in every single way  
6 compared to anything with R.

7 A Okay. I thought I did.

8 Q Doesn't seem that way. For example you don't crave me  
9 sexually.

10 That was especially needed during the past 24 hours?

11 A What does that have to do with R?

12 Q Sex.

13 It is not only shared by us as a thought object.  
14 There is subconscious evaluation, comparison, and  
15 postulates...

16 It is very destructive.

17 I/we really needed you to want me sexually yesterday  
18 and earlier.

19 A I don't know what to do, then. I offered.

20 Q You were almost asleep...You offered seemingly more as a  
21 favor instead of needing it so badly you couldn't live without  
22 it...

23 You need to be more aggressive, by far, than you  
24 ever were with R.

25 A Okay.



Rees - direct - Hajjar - WhatsApp Chats

3466

1 Q Take the most you want of something with him and your  
2 internal desire has to be more with me.

3 BY MS. HAJJAR:

4 Q Agent Rees, the references to R, is this a common  
5 reference throughout the messages that you reviewed?

6 A Yes, it is.

7 MS. HAJJAR: Turn to the next slide.

8 (Exhibit published.)

9 MS. HAJJAR: Well, I will turn to the slide  
10 following.

11 (Exhibit published.)

12 Q Are these some of the -- I'm turning to slide 32, which  
13 is various excerpts from different Government exhibits;  
14 Government Exhibit 301-R at page 20, Government Exhibit 1779  
15 at page 20, 1779 at page 27 and 1779 on page 82.

16 (Exhibit published.)

17 Q Are these just some of the excerpts relating to R or R?

18 A Yes, they are some of the excerpts.

19 Q And can you infer what R represents?

20 A R is an abbreviation for Robbie Chiappone.

21 Q Okay. I'm going to start reading from the top of this  
22 excerpt, which is September 6th, 2014, at 2:06 a.m.

23 Keith Raniere: Robbie was there tonight yet I still  
24 longed for you.

25 And can you read from the next excerpt?

Rees - direct - Hajjar - WhatsApp Chats

3467

1 A May, 31st, 2015 at 3:49 p.m.

2 No, but he'd make more sense than Robbie.

3 I was insane to choose Robbie.

4 Q If you hadn't seen this side of R...What were you  
5 choosing about him over me?

6 BY MS. HAJJAR:

7 Q Then July 16th, 2005, at 6:46 p.m.

8 Keith Ranieri: Fluffy believes you slept in the  
9 same bed with Robbie last summer.

10 I think with his door closed.

11 By MS. HAJJAR:

12 Q Could you read the last excerpt, please.

13 A 3:52 p.m. October 8th, 2014.

14 I don't understand this.

15 Q What don't you understand?

16 A Why Farouk is better than Robbie.

17 Q Why not?

18 Why is R special? Why did you type his full name?

19 A Oh, I was thinking out loud. Should I not have?

20 Q No. Curious.

21 I don't use his name for several reasons.

22 BY MS. HAJJAR:

23 Q I'm going to turning to page 76 of Government

24 Exhibit 301-R. October 7th, 2014, at 4:54 p.m.

25 Keith Ranieri: Why are you still protecting what

Rees - direct - Hajjar - WhatsApp Chats

3468

1 you did with R? Why won't you face this in yourself so things  
2 can get better?

3 A I don't have the answers you are looking for...I'm sorry.

4 Q Please find them now...Ask yourself those questions...

5 Visualize what you did, how you made those decisions and see  
6 the future evaporate...Also see yourself being the type of  
7 person you don't want to be...It should deeply disturb and  
8 disgust you...

9 I hate to be so crude, but it will build your  
10 conscience to strongly see our little child saying, Please  
11 mommy don't, as you spread your legs and picture that child  
12 withering as you do and get that's what you did...

13 A Whoa.

14 Q You seem not to acknowledge the crudeness of the raw  
15 destruction...It should be deeply disturbing and disgusting.  
16 It's you doing that in reality..

17 BY MS. HAJJAR:

18 Q Agent Rees, at the beginning of your testimony we  
19 reviewed a WhatsApp chat between Camila and Robbie Chiappone,  
20 a user identified as Robbie Chiappone.

21 A That's correct.

22 Q Have you reviewed that attachment?

23 A I have.

24 Q And just generally, based on the messages exchanged in  
25 that attachment, did it indicate a kind of romantic or sexual

Rees - direct - Hajjar - WhatsApp Chats

3469

1 relationship between Camila and Robbie Chiappone?

2 A Yes.

3 Q Agent Rees, is there -- are there references to  
4 successors? In your view?

5 A Yes.

6 Q Many?

7 A Yes.

8 Q I'm going to ask you to read the highlighted portion in  
9 blue starting from October 7th, 2014, at 11:40 p.m.

10 Q Keith Ranieri: What didn't you consider?

11 A The effects.

12 I had no idea the successor thing even existed.

13 Q I don't believe that's completely true...You also knew  
14 the purity thing was a strong value...I told you many  
15 times...But even if it didn't exist anyone other than us,  
16 doing what you did, with someone like R...Even with anyone far  
17 better...Should bring disgust...

18 On a general level, what does it say about the  
19 reliability of your love? Your word? On a small level, what  
20 do your actions the last few days of our vacation say about  
21 your traits? How can you feel these things are okay? Even if  
22 I'm not around, you would have to hate them...

23 The only way I can explain these thing is defiance.

24 Pride.

25 If your pride doesn't break now with this, you will

Rees - direct - Hajjar - WhatsApp Chats

3470

1 own it the rest of your life.

2 Your lack of immediate response is the worst yet...

3 A It takes me a while to process what you say especially  
4 something this heavy.

5 I feel like I'm under attack.

6 MS. HAJJAR: And turning to page 79 and then  
7 page 89?

8 (Exhibit published.)

9 BY MS. HAJJAR:

10 Q Okay. Starting at October 10th, 2014, at 11:10 a.m.

11 Keith Raniere: Please answer the 3 past questions.  
12 Also, 4 more questions to be answered right now: What have  
13 you done today for this? Have you failed today or done  
14 anything against your objectives? What are you doing towards  
15 them this moment? What have you done today that was difficult  
16 in the name of love for me?

17 A I have not eaten and am dedicating all my free time to  
18 you...either reading or communicating to figure it out. I  
19 have not indulged in anger.

20 Q Sounds like a start.

21 A Is there anything else you want to ask of me?

22 Q What I have already and as I've said figure out each  
23 thing you destroyed and address/fix each one. You need to  
24 lift them because there are a good number.

25 BY MS. HAJJAR:

Rees - direct - Hajjar - WhatsApp Chats

3471

1 Q And if you can read the text starting on October 10th,  
2 2014, and 12:31 p.m.

3 A I'm sorry.

4 I feel like I have a gun pointed at me and I'm just  
5 trying to say what you want to hear so you won't shoot but I  
6 don't know what it is you want to hear.

7 Q Show me you're resourceful. And what should someone do  
8 with such an issue? What would be the right thing for you to  
9 do for me considering?

10 A Beg you...?

11 Q Figure out what is right.

12 A Can you give me a hint?

13 Q Not really because ethics has to originate with you. If  
14 you heard our story what would make that aspect right?

15 MS. HAJJAR: And I'm going to turn to page 96 of  
16 Government Exhibit 301-R, October 14th, 2014, at 3:35 a.m..

17 (Exhibit published.)

18 BY MS. HAJJAR:

19 Q Keith Ranieri: Do you have physical desire?

20 A Can emotional be enough?

21 Q If you want me to come tonight. I will under these  
22 conditions: There will be no talking. You will meet me at  
23 the door in the outfit you think I would find sexiest. You  
24 will arouse me, we will make love for my satisfaction and  
25 pleasure. You will do everything you can to provide that. I

Rees - direct - Hajjar - WhatsApp Chats

3472

1 will finish and leave. Do you agree yes or no?

2 A Is there a reason why you picked 4:00 a.m. for this?

3 Q Forget it then.

4 A No no no.

5 Q Then?

6 A Why no talking.

7 Q Goodnight.

8 A I don't understand what's going on!

9 Q Too much pride. I'll text you tomorrow.

10 BY MS. HAJJAR:

11 Q Now, Agent Rees, there were a few messages that we looked  
12 at in which Camila references weight. Is weight a common  
13 reference in these messages that you've reviewed?

14 A Yes, it is.

15 Q And can you explain what you mean by that?

16 A Throughout the messages there is a push from Keith  
17 Ranieri for Camila to constantly lose weight, and a desire for  
18 her to be around a hundred pounds.

19 MS. HAJJAR: So I'm going to turn to the next slide.

20 (Exhibit published.)

21 Q Are these just some excerpts of the messages dealing with  
22 Camila's weight?

23 A They are some.

24 Q And so November 28th, 2014, at 1:03 p.m.

25 Keith Ranieri: How much do you weigh?

Rees - direct - Hajjar - WhatsApp Chats

3473

1 A I don't know.

2 I think 120.

3 Q Why did you gain?

4 You were 113?

5 A Lack of exercise during intensives.

6 Q You then need to eat less...The extra weight hurts my  
7 heart physically when I am with you.

8 MS. HAJJAR: And that is from Government's  
9 Exhibit 301-R on page 249.

10 And then December 4th, 2015, at 3:46 a.m.

11 Keith Raniere: By the way...how's your weight,  
12 et cetera?

13 A I don't know.

14 Why? Do I look fat?

15 Q I'm sad then because it's important to me...

16 To not know is to not care enough.

17 A I disagree but I will weigh myself for you.

18 MS. HAJJAR: Okay. Turning to the next slide, which  
19 is page 109 of Government's Exhibit 301.

20 (Exhibit published.)

21 BY MS. HAJJAR:

22 Q Starting from October 19th, 2014, at 12:32 a.m.

23 Keith Raniere: How would you lose the weight like  
24 you promised?

25 A Like I'm supposed to.



Rees - direct - Hajjar - WhatsApp Chats

3474

1 Q Question mark.

2 A Calories and exercise.

3 Q You don't get how much this hurts.

4 Calories and exercise haven't worked.

5 A Haven't worked?

6 They always work.

7 Q When was the last time you weighed 100? You were also  
8 supposed to loss the weight for my birthday...

9 They don't work because you don't do this  
10 consistently.

11

12 (Continued on following page.)

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar

3475

1 DIRECT EXAMINATION

2 BY MS. HAJJAR: (Continuing)

3 Q So, I'm really crushed you B tonight.

4 Agent Rees, I'm just going to stop there for a  
5 moment. Based on the context of the messages around this  
6 message, can you infer what B means?

7 A I infer B means bolemia.

8 Q Can you continue reading on?

9 A I am under threat now. Fear is a tool.

10 Q You're making light of the fact. You don't care.

11 A Excuse me?

12 Q That's rude.

13 A I'm sorry.

14 Q How will you make up for it? Maybe you should fast until  
15 you reach the weight.

16 A Are you asking I fast?

17 Q Why do you always go out of cause? What do you weigh?

18 A I don't want to fast. I don't think that's the best way  
19 to lose the weight. You're the one that mentioned it, so I'm  
20 asking if that is what you want.

21 Q That doesn't follow. It is out of cause to take a  
22 suggestion and try to avoid deciding for yourself by posing it  
23 as a question. I deserve more consideration than that.

24 A I don't want it for myself.

25 Q Turning to the next slide, which is the next page, page

Rees - direct - Hajjar

3476

1 110. I am going to start from the top. October 19, 2014 at  
2 12:47 a.m. Penance for indulgence. Penance for love.  
3 Penance for indulgence helps to build the character to stop  
4 indulgence, penance for love helps you understand the value of  
5 love so you can have it. It's also a penance for your word,  
6 so you know your word is serious, you collateralized it with  
7 something undesirable, yet effective. Oh, yeah, losing the  
8 weight is important too, meaning the other three reasons are  
9 even more important. But you do not need to fast to do these  
10 things. How much do you weight?

11 A I don't know.

12 Q That is really bad considering. Weigh yourself now?

13 A 130.

14 Q So how long will it take to lose the 30 pounds?

15 A Two months.

16 Q Should be much quicker, needs to be much quicker.

17 And then going down to 1:04 a.m., Keith Raniere  
18 that's out of cause too, but this is about you, me and us.  
19 You can't get to the me part unless you do the you part. Then  
20 once you've gotten done with the me part, you can begin on the  
21 us part. You need the weight done in one month. You need to  
22 be less than 120 by next Sunday. Ideally much less. Less  
23 than 115 would be best.

24 A Okay.

25 Q If you were 115 and you lost five pounce a week, you can

Rees - direct - Hajjar

3477

1 make the month. It does appear you need to be 115.

2 Do you understand that you can't help me without  
3 correcting/fixing you?

4 A Yes.

5 Q Do you understand the importance of life of having a  
6 conscious?

7 A Yes.

8 Q Do you understand conscious is having the capacity for  
9 great pain for bad decisions?

10 A Yes.

11 Q Do you understand in order to have that you must consider  
12 others in your decisions?

13 A Yes.

14 Q Like tonight, you did not consider how much your B would  
15 hurt me?

16 A No.

17 Q That's no conscious. Do you want to have no conscious?

18 A Question mark.

19 Q You had no conscious tonight when you made the decision  
20 to B.

21 And turning to the next slide. That's page 111 of  
22 Government Exhibit 301-R. Can you read from Camilla's portion  
23 at the top?

24 A October 19, 2014, 1:22 a.m. There are so many  
25 inconsistencies in what you just said. I don't know what to

Rees - direct - Hajjar

3478

1 do.

2 Q Question mark. Point out one?

3 A I told you this one before. I would ask and ask for help  
4 with the bolemia and your answers have always lose the weight  
5 first then I'll help you. It almost felt like you promised  
6 it. Certainly not, but you had a problem with it.

7 Q Although it's not highly relevant, it was lose the weight  
8 now and I will help you. Focus on the weight.

9 A So now you're saying that you had a problem with the  
10 bolemia when that was certainly not your priority.

11 Q There is nothing inconsistent even about what you said.  
12 The issue is evolving beyond your body. I just got your text  
13 and you were being prideful again instead of me doing this and  
14 you should show me how that is not a contradiction now. It is  
15 not. It should be easy. Also show me how you should have  
16 known your B. Hurt me. How your B hurt me.

17 Can you read continuing at 1:43 a.m.?

18 A I disagree. You're demanding that I say I don't doesn't  
19 make it so.

20 Q You disagree with what?

21 A Your accounts of the facts. This is a very sensitive  
22 subject for me. You may have thought you were an ally, but I  
23 actually felt very alone and misunderstood which I did tell  
24 you about. I agree that the issue has always been overcoming  
25 my body, but the emphasis you're putting now on my bolemia

Rees - direct - Hajjar

3479

1 seems to be inconsistent what I experienced in the past. For  
2 years I asked you for help. So now for you to demand that I  
3 overcome it, expect me to do it with ease is hard. I don't  
4 have an ally.

5 Q It would be best for you to assume I'm consistent and  
6 find out why you're protecting or prideful. I'm known for my  
7 consistency, even by my enemies in the legal case. It is  
8 unlikely suddenly I would be inconsistent. I'm on the verge  
9 of cutting off communication. I need to see and prove to me  
10 you do. I've always been your ally and a great ally. Your  
11 last text is just untrue.

12 And then turning to page 113 of Government Exhibit  
13 301-R. Can you read Camilla's portion starting at the top?

14 A 9:14 p.m., October 19, 2014. Not true. I will diet and  
15 exercise.

16 Q It is true up to this point. You need to really care  
17 about it to hit 115 by next Sunday. How have you done today?  
18 I'm sorry to mention this, but it's very important in several  
19 ways, even as a penance where you show yourself you care by  
20 not indulging. For us, for me, for you, please don't B  
21 tonight. After last night, I didn't think I would have to  
22 ask.

23 A Oh, I have not done that. I thought this was exactly  
24 about the weight. Please don't ask me that.

25 Q How much do you weigh now?

Rees - direct - Hajjar

3480

1 A I don't know. I will weigh myself in the morning.

2 Q How did you know 130 last night?

3 A By stepping on the scale.

4 Q Why not now? Keep in mind the pain for me around B. You  
5 stopped for several days for a misogynist who played you.

6 A My bolemia is not about you. If this is your idea of  
7 helping me overcome it, to force it out of me, it is probably  
8 the worst approach. Please don't.

9 Q Okay. I am going to turn to page 122 of Government  
10 Exhibit 301-R. Can you read the top starting with Camilla?

11 A 12:05 p.m., October 23, 2014. I don't think we are a  
12 naturally perfect match, but I love you more than anything.

13 Q What things are not naturally perfect for you?

14 A We don't share the same sense humor, touching style. We  
15 do share core values and love, but there are things that feel  
16 effortful.

17 Q I don't necessarily agree, but there is an important  
18 point. Many years ago I could have argued the same. You are  
19 not the perfect natural fit. You do not have much formal  
20 education. You were not a world-class athlete. You were not  
21 a musician, blah, blah, blah. I made you my standard of  
22 pointed work and attribution. If there was something that  
23 wasn't perfect for me, I'd change my definition of perfect for  
24 real.

25 A I understand.

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3481

1 Q I made you my standard of beauty. What I thought was  
2 beautiful before in some case doesn't even rate. It is now  
3 compared to you. By definition, nothing can be as beautiful  
4 or good. There could never be an R. For me no matter what  
5 her qualifications.

6 A Kristanna got close and that was natural. No?

7 Q All is compared to you as the standard of perfection,  
8 Kristanna did not come close. I just started to enjoy that  
9 she wanted to learn and apply changes. Had it continued and  
10 had she changed to my liking, she would have become much  
11 shorter, dark-haired Mexican. Oh, yeah, she would have had to  
12 become you?

13 A Hahaha.

14 Q No. She has natural fits with me but all that is  
15 important as compared to you. She doesn't get why I talk  
16 about you like that. I used to find some light-haired women  
17 attractive. I moved my standards so much it was hard to  
18 stomach them. Even brown hair is washed out for my taste now.  
19 Ten years ago that was not the case.

20 All right turning to page 168 of Government Exhibit  
21 301-R. Can you begin reading November 8, 2014, 8:20 a.m.

22 A Here. My commitment to listen to you to do the right  
23 thing. I find my body is not always aligned with my  
24 commitment or my head, but I want to uphold my commitment  
25 either way.



Rees - direct - Hajjar

3482

1 Q How much do you trust me?

2 A I don't want to keep choosing fear, I don't want to be  
3 Lucifer.

4 Q Good. Eventually our bodies are inconsequential with  
5 respect to our commitment.

6 A Not sure how to quantify that as needed.

7 Q And G-0 trust has to be tested.

8 A I think that is connected to the commitment. I  
9 understand. I am ready and I am never ready at the same time.

10 Q Agent Rees G-0, the reference to G-0 here, is that  
11 explained in other messages?

12 A It stands for ground zero.

13 Q G0?

14 A I think the commitment brings G0. Someone just asked  
15 another question for you.

16 Q What's the question?

17 A Who do you go to to challenge you? Since you are the  
18 highest rank and you are so revered by the community, who  
19 challenges you?

20 Q That question may come from pride or not, also an  
21 underlying socialism or not. I would have to see the person  
22 and how they asked. Of course for me, all people challenge  
23 me, as do all things.

24 Switch to the next slide, which is -- slide on page  
25 178 of Government Exhibit 301-R.

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3483

1           That is a summation of our 8.5 years together. Hard  
2 for me to bear. I don't know what actions can be done to  
3 reverse the verdict and change the record. I don't know how  
4 to get back that part of me that died today.

5 A     Please drop the views of think. I only mentioned it  
6 briefly. I feel like you're going to a place where it  
7 shouldn't be because it's not true.

8 Q     What is not true?

9 A     What you are making yourself to be. Please let it go for  
10 now. I love you.

11 Q     Maybe you're just underestimating the significance of a  
12 rapid association. The thought of me should never come up in  
13 an abuse question and R definitely should. How am I  
14 incorrect?

15           Now, Agent Rees, in the messages you've reviewed, is  
16 there references to where Camilla is living at the time that  
17 these messages are being sent?

18 A     That's correct.

19 Q     Okay. I'm going to turn to slide 51. Does this have a  
20 few excerpts of messages that reference Camilla's residence?

21 A     Yes, it does.

22 Q     Can you read from the top starting on September 12, 2014  
23 at 3:01 p.m.?

24 A     Willa saw me ride out of Victory.

25 Q     Did she see from where?

Rees - direct - Hajjar

3484

1 A She did not see me come out of the house. She was  
2 between Victory and Hale headed our way.

3 November 27, 2014, 2:22 a.m. I will go peacefully.  
4 I will need a few days to deep clean the apartment.

5 August 29, 2015, 5:34 p.m. I have worrying news.  
6 Anna is moving into Victory, might be a problem. 2/13 or  
7 something like that. I believe it is within sight of our  
8 place.

9 Q And when Camilla says within sight of our place, are  
10 there references to our place, our apartment in the messages  
11 that you reviewed?

12 A Yes, there are.

13 Q And turning to page 39 of Exhibit 1781, can you read the  
14 highlighted portion, please?

15 A October 10, 2015, 9:32 a.m. 120 Victory Way.

16 Q Now, is this an excerpt from another text file attaching  
17 WhatsApp messages?

18 A That's correct.

19 Q Who is that between?

20 A Camilla and Daniela Padilla.

21 Q And have you reviewed this attachment as well?

22 A I have.

23 Q Is it in Spanish?

24 A It is.

25 Q Turning to page 220 of Government Exhibit 301-R. This

Rees - direct - Hajjar

3485

1 was bad because you are not at G0, ground zero. You have  
2 affirmed him you have made that Friday okay. You have  
3 disgraced me. He needed to feel like a rapist and that no  
4 part of you liked him or thought him okay. How can you  
5 reverse this now, he needs to believe he disgusts you?

6 A I have disgraced you?

7 Q Yes. In the worse deepest sense. Only if he believes he  
8 disgusts you and nothing was good can it not. I'm crushed. I  
9 think this has to be the last conversation. You had to be  
10 perfect. I told you so. I don't know what to do at all.  
11 Each moment is more damaged. Every time he sees you now, more  
12 damage. I feel all is lost and you're silent.

13 A I'm crying.

14 Q I'm going to cut off then. We will need to finish a few  
15 things and you need to move out.

16 That's all you can do?

17 I guess that's it then. Goodbye.

18 A No.

19 Q Then do something?

20 A I don't know what to do.

21 Q Nullify what he might think. Tell me what you did each  
22 of the few times right now.

23 MS. HAJJAR: Your Honor, I don't know if you would  
24 like to take a break at this time.

25 THE COURT: We should. Let's take our morning

1 break. All rise for the jury.

2 (Jury exits the courtroom.)

3 THE COURT: You may stand down. Do not discuss your  
4 testimony with anyone.

5 THE WITNESS: Yes, sir.

6 (Witness steps the stand.)

7 THE COURT: We will take a 10-minute break.

8 (Recess taken.)

9 THE COURT: Ms. Hajjar, about how long will you have  
10 this witness on direct?

11 MS. HAJJAR: I think the remainder of the day, Your  
12 Honor. I have asked defense counsel to give an estimate of  
13 their cross-examination time so I can stop and give them time  
14 to conclude that cross-examination today. That is the hope,  
15 Your Honor. I don't know if it will go.

16 THE COURT: What you are saying is that between  
17 direct and cross you think it will go the rest of the day?

18 MS. HAJJAR: Yes.

19 MR. AGNIFILO: I don't know that there will be a  
20 long cross. I will only cross on things that are contextual.  
21 I certainly don't see a long cross. There might be a very  
22 short cross because it seems that the Government is going to  
23 be getting into large kind of parts of this, which really kind  
24 of negates the need to go back into them.

25 THE COURT: All right.

1 MR. AGNIFILO: So I don't see a long cross.

2 THE COURT: All right.

3 MR. AGNIFILO: Judge, can I make one other thing  
4 clear.

5 THE COURT: Yes.

6 MR. AGNIFILO: Thank you, Judge. We obviously  
7 didn't object to the disc coming into evidence, but that's  
8 subject to the objection we raised in the letter.

9 THE COURT: I understand that.

10 MR. AGNIFILO: Yes, I just wanted to make sure.

11 THE COURT: I understand that. But I think the  
12 comments of Camilla are in the context of Mr. Ranieri's  
13 statements are necessary otherwise the defendant's statements  
14 are not going to be understood. If you want me to give a  
15 limiting instruction, you will let me know what that is, but I  
16 am going to allow the statements to come in because otherwise  
17 the jury will be left with just Mr. Ranieri's statements and  
18 not with any context in which to understand them. So I  
19 understand your point about Camilla's statement. She is not a  
20 co-conspirator in regard to this particular situation.

21 MR. AGNIFILO: So --

22 THE COURT: If that's the argument, she is not.  
23 This is just their relationship that's the subject here.

24 MS. HAJJAR: If I may clarify, Your Honor. The disc  
25 we admitted is only vicibabi@gmail.com, which I understand the

1 defendant is not objecting to subject to Your Honor's ruling  
2 earlier this morning. The camillascastle e-mail account I  
3 have not yet offered. I do have them for the Court's review  
4 if the Court would like. In our view, the same way Camilla's  
5 messages in the context of the vicibabi@gmail.com exchange are  
6 necessary to understand the response, so too for  
7 camillascastle. But I haven't yet offered that exhibit.

8 MR. AGNIFILO: By way of example, I mean, one of the  
9 ones where I think that we could still have a problem is  
10 Government Exhibit 1701, which has now been admitted to the  
11 jury, is just a statement by Camilla, you know, that full moon  
12 is tomorrow and that will make it 30 full moons that we've  
13 been together. There is no response to that. They have  
14 certainly offered it for the truth, because they didn't follow  
15 it up with the agent.

16 THE COURT: That is a good question. What about  
17 that statement?

18 MS. HAJJAR: Your Honor, the defendant's objections  
19 have been confined to camillascastle except for this objection  
20 to the 1700 series that dealt with Lauren Salzman. Counsel  
21 didn't mention the 1701 e-mail account in his remarks to Your  
22 Honor this morning.

23 MR. AGNIFILO: It's the first thing we listed in our  
24 written motion, 1701. I mean, it's the first one. In  
25 category 4, we said we object to the 1700 series as being

1 inadmissible hearsay offered for the truth, including the  
2 following documents, 1701.

3 THE COURT: 1701. It's there.

4 MS. HAJJAR: Your Honor, if you would like to make a  
5 limiting instruction to that effect, we don't object to that.  
6 This was sent to kunterre@nightcap@rr.com. It's significant  
7 because many of these e-mails are sent from Camilla to  
8 Camilla. That one was sent to the defendant and they're in  
9 the same --

10 THE COURT: But it is her statement not to him, not  
11 his statement to her, and there is no follow on by him which  
12 would permit it in, at least for context. That's the problem.

13 You think about that because I can always advise the  
14 jury -- well, if I start advising the jury on that, that is  
15 going to bring more attention to it. I think that is the last  
16 thing that the defense would want.

17 Yes?

18 MR. AGNIFILO: Right. That's right.

19 THE COURT: Well, let's move on.

20 MS. HAJJAR: Thank you, Your Honor.

21 THE COURT: But if there is any statement that  
22 Camilla is making that is not in the context of other  
23 statements made by the defendant that establishes -- that  
24 makes sense out of the defendant's statement or follows on to  
25 the defendant's statement, then you will let me know because I



1 will rule on it.

2 MS. HAJJAR: I think this will come up in the  
3 context of the camillascastle 1400, which we can address. We  
4 can confer with defense counsel over lunch. I won't get to  
5 those before the lunch break.

6 MR. AGNIFILO: It will come up there.

7 THE COURT: I understand. You understand my concern  
8 about Camilla is not a co-conspirator with regard to her  
9 relationship, romantic relationship with the defendant.

10 MS. HAJJAR: With respect to DOS, she is. But with  
11 respect to the e-mails we are referring to now, correct.

12 THE COURT: With respect to these e-mails.

13 MS. HAJJAR: Yes.

14 THE COURT: When we get to DOS, that's a whole  
15 different situation potentially.

16 MS. HAJJAR: Yes, Your Honor.

17 THE COURT: All right. Let's bring in the witness.

18 (Witness takes stand.)

19 THE COURT: Let's bring in the jury, please.

20 (Jury enters the courtroom.)

21 THE COURT: Please be seated.

22 You may continue with your examination of the  
23 witness. The witness is reminded that she is still under  
24 oath.

25 THE WITNESS: Yes, Your Honor.

Rees - direct - Hajjar

3491

1 BY MS. HAJJAR:

2 Q Agent Rees, before the break, you had discussed certain  
3 excerpts of messages referencing Camilla's residence at the  
4 time. So now I am going to skip to the next slide, which is  
5 page 221 of Government Exhibit 301-R, and starting at the top,  
6 on November 23, 2014, at 11:33 a.m., Keith Raniere, if you can  
7 fix these things now, you must leave there immediately and not  
8 come back. Answer please, anything else?

9 A Not really, just staffing stuff.

10 Q How are you going to reverse this and the perception of  
11 everyone there?

12 A I don't know.

13 Q Then leave now. I can't cover for you?

14 A It was frightening that you are commanding that.

15 Q Question mark. It's frightening what you did again. I  
16 can't believe you just wrote that.

17 A I feel at your mercy.

18 Q You either fix, leave or we're done. That's awful. I've  
19 been at your mercy and you abused the power. I want to know  
20 you understand your abuse.

21 A Yes.

22 Q Question mark. Then fix, leave or we're done. Which?

23 A I'll fix.

24 Q How?

25 A I'll treat him like a rapist.

Rees - direct - Hajjar

3492

1 Q That's what you should have done. You already told the  
2 rapist that you can't be taken seriously. What more care are  
3 you going to do to get back what you lost?

4 A I don't know.

5 Q You need to go to him, tell him you tried to be friendly  
6 but can't stomach it and that he should please stay away  
7 without him thinking you're infatuated. He needs to know  
8 you're disgusted, like you would a rapist?

9 A I'll try.

10 Q Not good enough. Leave now.

11 A No. I'll do it.

12 Q This is more serious than you know. How can you allow  
13 these things? Say something. When did the sitting thing  
14 happen?

15 A I want to feel free. I feel my entire person depends on  
16 you. It is very scary and suffocating. I can't remember.

17 Q Then turning to page 222 of Government Exhibit 301-R, I  
18 am going to start at 12:03 p.m. on November 23, 2014, Keith  
19 Ranieri: Call me now ? That's last chance. Move your stuff  
20 out tonight.

21 A I wish you didn't make me into a monster.

22 Q You are treating me that way. Anything else to say? I'm  
23 going over to start moving some things out. Nothing else? I  
24 will block you in one minute and then I can't reverse it.

25 Your pride won.

Rees - direct - Hajjar

3493

1 I guess I still can't believe you're really uncaring  
2 when I'm the one who's damaged. I want you moved out by  
3 tomorrow morning. Then there's a few things that need to be  
4 done.

5 I am going to turn to the next page, page 233 of  
6 Government Exhibit 301-R, if you could start with the  
7 highlighted portion on November 24th.

8 A 8:13 p.m. I feel like your puppet.

9 Q I will reassess all of these interactions. He will. As  
10 for you, that doesn't help me. If you feel like my puppet, I  
11 don't know what to say. You should know me better. I won't  
12 work that way. What I'm asking you to do is rightful. How  
13 you're treating me is also important. Please respect my  
14 morality.

15 A You're asking me to do something I'm not comfortable  
16 blindly.

17 Q How can I unblind you? To fix other things you will have  
18 to do things absolutely blindly. This is simple and rightful.  
19 Honestly, if I haven't even earned this level of trust, we are  
20 nothing with no hope. You should want to prove yourself. At  
21 this point I should never have to argue a request. The harder  
22 the request, the better. You wanted to be my slave. This is  
23 the opposite. But I have earned the trust.

24 (Continued on following page.)

25

Rees - direct - Hajjar

3494

1 EXAMINATION CONTINUES

2 BY MS. HAJJAR:

3 Q Now, Agent Rees, in the messages you reviewed, are there  
4 instances in which Camila asked permission of the defendant to  
5 do certain things?

6 A Yes.

7 Q Can you give some examples of that to the jury?

8 A Camila would ask permission to text anyone. She asked  
9 permission to cut her hair. Among a few other things.

10 Q And turning to the next slide, which is slide 57.

11 Are these some excerpts of the exhibits you've  
12 reviewed in which Camila asked for permission for various  
13 things?

14 A Yes, that's correct.

15 Q Starting from the top. Can you please read the  
16 highlighted portions?

17 A October 24th, 2014, 4:49 p.m.: Love, I really hate that  
18 I feel like I have to ask you for permission to do anything  
19 outside of my schedule. I don't want us to be like this.

20 May 11th, 2015: 11:44 a.m.: Can I text my family?

21 Q Yes.

22 A June 12th, 2015, 10:48 p.m.: Oh, which reminds me, can I  
23 ask your permission for something? Can I shave the kitty?  
24 I'd save whatever I take off for you.

25 August 12th, 2015, 8:25 p.m.: Can I get your

Rees - direct - Hajjar

3495

1 opinion/permission on something?

2 Four days away for a Flamenco workshop.

3 Q Give me a day, likely a yes.

4 A Okay, I won't consider it a yes yet. Thank you for  
5 considering.

6 Q And, Agent Rees, in some of the messages you reviewed,  
7 does Camila express sadness and depression?

8 A Yes, she does.

9 Q Turning to the next slide, which is excerpts of certain  
10 messages, can you start from the top starting on December 8th,  
11 2014, 11:38 p.m.?

12 A You have taken all my life.

13 Q Please tell me how. Really, what do you mean so I can  
14 understand?

15 A You have taken everything that is important and  
16 meaningful to me. But it is more than that, you have branded  
17 me for life. Your words have destroyed me. I feel helpless  
18 and worthless. I feel dead inside.

19 December 24th, 2014, 10:49 p.m.: I don't know how  
20 to handle your actions. I considered ending my life again. I  
21 don't think you realize how your words and actions affect me.

22 December 27th, 2015, 6:02 p.m.: I feel depressed.  
23 The only concern I can see that would be legitimate would be  
24 that I am going crazy and that I'm not emotionally sound. I  
25 have not cut my hair. I was going to cut it the day after you

SAM

OCR

RMR

CRR

RPR

Rees - direct - Hajjar

3496

1 left. I don't feel like going out and seeing people. I feel  
2 very low.

3 Q Now turning back to Government Exhibit 301-R on page 239.  
4 Just starting from the top at the highlighted portion, can you  
5 read Camila's portion?

6 A November 27th, 2014, 1:24 a.m.: Okay, I'll change. What  
7 do you want me to do?

8 Q Trust me 100 percent. Obey me 100 percent. I will come  
9 up with an immediate test. Any failure is unacceptable. You  
10 have to earn me. No out of causedness.

11 A Okay.

12 Q Now, I need a vow of absolute obedience, which I will not  
13 release you from until the letter next summer. Now more  
14 uncertainty -- no more uncertainty, doubts or not trusting. I  
15 need to know what happens if you fail or act unhappy?

16 I expect you to text me this vow now. I will text  
17 you later. I expect you to answer right away, otherwise no  
18 go. You need to be happy, whenever you are with me, because  
19 my time means that much. Yes?

20 A Reading. Just got a whole bunch of your texts.

21 Q I need a yes or no now.

22 A Emoticon.

23 Q That's a no. Please pack up then.

24 A I can't do it, love. I'd be wasting your time. Please  
25 don't be mad.

Rees - direct - Hajjar

3497

1 Q Right, pack up.

2 A Please don't hate me.

3 Q I'll contact you tomorrow, please move out.

4 Then turning to the next page, page 240 starting at  
5 the top, November 27th, 2014, 1:45 a.m.

6 Keith Ranieri: No compromise. I have compromised  
7 too long and you have abused it. A stranger should have been  
8 treated better.

9 A What am I supposed to do? I'm sorry.

10 Q Bullshit. Either take the vow and do what you know is  
11 right and love me or stop using the situation and move out.  
12 Simple.

13 A You seemed so nice earlier today. What happened? You're  
14 being so heartless. What happened to your offer from last  
15 night?

16 Q No, you are heartless. I am just making a firm demand  
17 for once. If I were heartless, I would just kick you out. I  
18 am demanding what I deserve. There is nothing heartless about  
19 it. What is heartless is your behavior and how you treat me.  
20 Heartless is never even committing to fix what you did.

21 You abused last night's offer. No more discussion  
22 or selling. You change dramatically or leave. This is the  
23 last time I'm calling. Your phone rolled to voicemail. It's  
24 up to you.

25 A My phone died in the middle of the text. Why are you



Rees - direct - Hajjar

3498

1 being so cruel? Please don't.

2 Q That's insulting.

3 A I have no one to go to. Please don't be like this. I'll  
4 do whatever you want. Please don't be like this.

5 Q Have I earned whatever I'm demanding? If so, it's not  
6 cruel to demand it absolutely. If not, just leave. There is  
7 no cruelty. You -- through give me uncertainty when I have  
8 earned so much moreover nine years, nine years, plus the  
9 things you've done are cruel. Calling me cruel in light of  
10 that is cruel. You haven't even fixed and you use your  
11 uncertainty to take.

12 Text me your vow. Prove to me you know I'm not  
13 being cruel at all. I'll give you a test later or else leave.  
14 It's simple.

15 A I closed off the rest of my world for you. I don't have  
16 friends because of you. I have no one to go to because of  
17 you. You can't abandon me like this. I didn't think you were  
18 capable of this.

19 Q That's a bullshit strategy. You would have betrayed me.  
20 You're having a party tomorrow. Show me you know you're being  
21 manipulative in a bad way or just leave.

22 A I don't know what to make of all this.

23 Q Your blame is revealing.

24 A I don't understand how you could have the heart to do  
25 this. The you that I knew would never do this. What

Rees - direct - Hajjar

3499

1 happened?

2 Q This is my last text. I don't deserve blame. I need a  
3 convincing apology, a proof you understand, and a vow. These  
4 techniques you're using worked in the past. I just can't give  
5 into them anymore. If I don't get what I want, I want you  
6 out. I will not text unless I get it. Please stop the  
7 you-I-knew stuff, that's really bad. You damaged me. Cut the  
8 victim stuff. I deserve this stuff and much more. You are  
9 making things worse with your strategies and I am beginning to  
10 feel very played.

11 A I will go peacefully. I will need a few days to deep  
12 clean the apartment. I have never felt such deep pain. I  
13 would have never thought that you would do this. I think it's  
14 your right to kick me out or set boundaries, but you don't.

15 Q Then turning to -- I am going to skip to page 245,  
16 starting at the top of the highlighted portion, November 27th,  
17 2014, 1:54 p.m.

18 Keith Ranieri: The vow doesn't have to be that  
19 long.

20 A I get fearful because I project you will abuse that  
21 power.

22 Q There will be times it will seem like I am. I won't, but  
23 it is part of proving trust. If it never seemed questionable,  
24 then it wouldn't be trust. I've earned trust. Do it now,  
25 please.

SAM

OCR

RMR

CRR

RPR

Rees - direct - Hajjar

3500

1 A Okay.

2 Q Text it now.

3 A I vow to do as you say.

4 Q A hundred percent obedience?

5 A A hundred percent obedience. I don't know why I'm scared  
6 shitless.

7 Q You're scared because you're serious, that's good. Okay.  
8 Today you must be more or as much adult than everyone. You  
9 must be the model of restraint. No alcohol of any sort. Not  
10 a sip. And eat very little. You must build yourself to be a  
11 new woman, one that is serious about her future. This is  
12 particularly important for Fluffy. Copy? You also need to be  
13 responsive to me at all times, including now.

14 A Shit. Well, I'm already questioning because I don't  
15 understand why I have to do that since I don't want to be that  
16 type of woman; never have.

17 Q Do you want honor, dignity, respect or love? I could  
18 have said: Prove I am most important. Drop everything. Stay  
19 home today, clean and certainly don't go to Wilton. It's an  
20 insult. So I am being mild. What I said serves many  
21 purposes. You actually do want to be that type of woman. You  
22 react to terms such as slut or whore. As you age you will  
23 be seen more and more like that if you don't change.

24 That is true even if you're married or delegate  
25 celibate. Seen. Copy? I don't want to keep calling you to

Rees - direct - Hajjar

3501

1 get you to answer. Please check hour WhatsApp frequently like  
2 I do for you.

3 I am going to turn to page 262 of Government  
4 Exhibit 301-R. Can you read the top, please?

5 A December 1st, 2014, 5:50 p.m.: I thought a lot about you  
6 and about us today.

7 Q And?

8 A Part of me feels like I don't want to be with you. Part  
9 of me wants to stay.

10 Q Then turning to the next page, page 263, this is the  
11 continuation of the line you just read. Just continue.

12 A Part of me wants to stay with you because I know it is  
13 right. All of me loves you. But I realize why I feel certain  
14 ways about you. I feel you as a parent, as a god. That's why  
15 your comments hurt so much. I take them as truth. You are  
16 the holder of truth. And also why part of me won't admit I  
17 did something bad because the gods are indestructible.

18 With a lot of our dynamics this feels very present,  
19 and although logically I know that you are not my parent, a  
20 big part of me feels the need to break away from the  
21 dependence, to be independent. I never wanted you to be my  
22 parent, but I feel sometimes we fall into that dynamic.

23 Q I understand. In this specific case you should want to  
24 give your god everything, certainly more than you would have  
25 ever have given R. Your belief of unsafety and intimacy with

Rees - direct - Hajjar

3502

1 me is the real problem, especially if I were to come over and  
2 rest with you. The larger picture things you mentioned we can  
3 speak about, but it is necessary you start needing to serve  
4 me, please me, earn me, to make anything right.

5 A It seems like that only makes the dependency stronger.  
6 That feels super fearful.

7 Q Okay, I am going to skip to the next page here, slide 65.  
8 This is page 269 of Government Exhibit 301-R.

9 Can you read from the top, please?

10 A December 4th, 2014, 2:26 p.m.: Your words still haunt  
11 me. I desperately want you to know you're not correct, that  
12 you were not wrong about us, but I just fucked it up big time.  
13 One of the things you said was that I didn't want to have -- I  
14 didn't want you to have children. It was very painful to hear  
15 you say that, so I've been thinking about what to do about  
16 that.

17 I'm sorry that I ever led you to believe that was  
18 true. If that is what you think of me, then maybe my sister  
19 is the best person to have children with. You are not a prize  
20 I am competing for, you are my love.

21 Q Think of what -- think what of you, honey?

22 A That I don't want you to have children.

23 Q You wouldn't discuss or help me with the alternatives:  
24 You, your sister, other or none. You haven't done what it  
25 takes for you. I've cut off other option goes and although

Rees - direct - Hajjar

3503

1 you won't do what it takes for you, your sister is  
2 intolerable. This is what you presented about the subject. I  
3 don't want to think that, but I see no alternative.

4 Agent Rees, here where Camila and the defendant are  
5 discussing Camila's sister, are there references to Camila's  
6 sister throughout the WhatsApp messages you reviewed?

7 A Yes, there are.

8 Q So the next slide, slide 66, does this have an excerpt of  
9 a few of those messages referencing Camila's sister?

10 A That's correct.

11 Q Starting at the October 14th, 2014 at 1:25 p.m.

12 Keith Ranieri: My dearest love, please hear me when  
13 I say the emotions you had tonight are the core of what needs  
14 to do go. I've always believed you were stronger than your  
15 mother and your sisters (also male side, but it is pride in  
16 more of a male way.)

17 Can you read the next excerpt please?

18 A December 2nd, 2014, 12:57 p.m.: Were you serious about  
19 having children with my sister or were you using that to scare  
20 me?

21 December 2nd, 2014, 1:03 p.m.: You know how much we  
22 went through because of your relationship with her. I always  
23 felt that you chose her over me. If you have children with  
24 her, you'd be making the ultimate statement that that was  
25 true.

Rees - direct - Hajjar

3504

1 Q Then on October 11th, 2015, 5:24 p.m.

2 Keith Ranieri: Make sure your sister doesn't see  
3 you texting.

4 A October 27th, 2015, 1:42 a.m.: I did. I may have not  
5 heard you because I was afraid. I really thought I was not  
6 going to be part of your life because I was so afraid that it  
7 looked like you were going to choose my sister.

8 Q The next slide is page 280 of Government Exhibit 301-R.  
9 December 7th, 2014, 11:09 p.m.

10 Keith Ranieri: The apartment --

11 THE COURT: You might try to reboot it.

12 (Pause.)

13 THE COURT: Just give it a minute.

14 (Pause.)

15 THE COURT: Go ahead.

16 MS. HAJJAR: Thank you, Your Honor.

17 BY MS. HAJJAR:

18 Q 11:09 p.m.

19 Keith Ranieri: The apartment will need to be done  
20 first thing tomorrow 8:00 a.m. Put all my things, money, et  
21 cetera, together. You need to increase your hours back to  
22 normal.

23 A I can't do that. I moved it so they were not depending  
24 on me. I will be out of work. Does that mean that I'm not  
25 doing the education thing? Can I -- can I have longer for the

Rees - direct - Hajjar

3505

1 apartment? There are a few things I can't do because of noise  
2 and neighbors.

3 Q Then at 12:23 a.m.: Please say something or we just go  
4 forward with this dissolution of us. I'm surprised that you  
5 haven't written. I'm writing to say I'm very sorry for the  
6 whole situation and our interaction. I feel powerless. It's  
7 up to you.

8 A I've been thinking. I want to be a model for my kids,  
9 especially G. I can't lose G. I'll do what it takes. Please  
10 don't take him away from me. I'll do whatever you want.

11 Q Agent Rees, are there many references to G in these  
12 messages you reviewed?

13 A Yes, there are.

14 Q And in context, who does G refer to?

15 A Gaelyn.

16 Q Keith Ranieri: Then do what it takes. That involves  
17 being at cause, fixing what are now many misperceptions,  
18 eliminating pride, and treating me as I deserve and what  
19 should have been. No anger allowed starting today -- starting  
20 now. I need to see what I feel are substantial things today.

21 A Okay. You won't take him away from me?

22 Q And turning to the next page, which is page 281. The  
23 same exhibit at the top. Can you start at December 8th, 2014,  
24 1:17 p.m.?

25 A That's bullshit. You control it all. You decide. I'll



Rees - direct - Hajjar

3506

1 do what you want. I don't think what you're doing is right.  
2 You're abusing your power, but I am powerless and I want my  
3 kid. I was more there for him than you ever were. I don't  
4 know how you can be okay with yourself doing this.

5 Q Great start. I don't think this is gonna work.

6 A I already told you I would do what you want.

7 Q You have to change your behavior and values to be a  
8 model. Here's one assignment to be done now. Prove to me  
9 what you said above was both mean and incorrect. It seems you  
10 have no concept of why you do the things you do, why you feel  
11 the way you do, or why I do the things I do. If you  
12 understood these things you would be so sad about what you  
13 have done and are doing. You would be sad at what I'm facing  
14 and you would be sorry for the way you treat me, the things  
15 you think, and what you've said.

16 You still don't get it?

17 A I feel like a prisoner. This is your world and your  
18 rules. If you suddenly decide to change the rules, which you  
19 have, it is fine because this is your kingdom. I can either  
20 abide by your ruling or leave. Unfortunately, I promised I  
21 wouldn't, so I am in your kingdom under your rules. It  
22 doesn't mean I agree. I had always believed you would never  
23 hold me like this, that you would let me go as you would say.  
24 You forgot to mention that would unleash your fury if I ever  
25 wanted to go, so I am all yours. What do you want me to do?

Rees - direct - Hajjar

3507

1 Q Turning to the next page, which is page 321 of Government  
2 Exhibit 301-R. Starting at the top, December 24th, 2014,  
3 8:04 p.m.

4 Keith Ranieri: That response is like a monster. I  
5 have not called you a monster yet. I've spent six months  
6 painting to prove you're not. You are quite insulting and  
7 take everything I've done for granted. This whole time you  
8 have not fixed, but are playing victim. If you're not a  
9 monster, shouldn't I act as I am? Or if you are a monster,  
10 shouldn't I act as I am? Isn't my moral duty to those who  
11 depend on me?

12 Prove you are not a monster, that is what's needed.  
13 Stop accusing me falsely of calling you one. You've done  
14 monstrous actions. Prove you are not a monster. It is only  
15 right. You've done monstrous actions. It is morally right  
16 you prove you're not a monster. That means you're not a  
17 victim. Not going to blame. Not going to feel sorry for  
18 yourself. Not going to distract.

19 Please say something compassionate, caring and not  
20 monstrous. I have tried calling you to speak. You seem to be  
21 avoiding. Just look at this from my side, you are seeming  
22 like a monster using monster strategies. Make your decision  
23 explicitly in cause without distraction or any strategies,  
24 please.

25 A You want me to enjoy being abused. It's not going to

Rees - direct - Hajjar

3508

1 happen. I am aware of the conditions. My life is yours.  
2 That is my decision. I hope to one day understand your  
3 actions.

4 Q Agent Rees, in this exchange on December 4th, 2014, are  
5 there many references to the word monster back and forth?

6 A Yes, there are.

7 Q And turning to the next slide, which is excerpts from --  
8 this is Christmas Eve 2014 starting from the top.

9 Can you read the portion from Camila?

10 A 7:30 p.m.: Wow, I am not the heartless monster you are  
11 making me out to be.

12 Q Please move out. Do not come to volleyball. Do not come  
13 to Nancy's tonight.

14 A I am not the monster you are making me out to be. You  
15 have it all wrong.

16 Q Prove it. A monster would say that also for their gain.  
17 Taking a long time is what monsters do. Please stop. I've  
18 dealt with many monsters.

19 A Do you really think I'm a monster?

20 Q Please don't do this. This is truly a monster response,  
21 prideful and evasive. You just said you made one. Tell me  
22 your decision, please. I tried calling you to speak. You  
23 seem to be avoiding. Just look at this from my side. You're  
24 seeming like a monster using monster strategies.

25 Turning to slide 71.

Rees - direct - Hajjar

3509

1 Agent Rees, in some of the messages you reviewed are  
2 there references to this Christmas Eve?

3 A Yes.

4 Q Okay. Can you read these excerpts starting on  
5 October 22nd, 2015?

6 A 1:45 p.m.: Oh, I also have something else to tell you.  
7 I may have told you already, but I just want to be sure.

8 Q What?

9 A I told you that I called and hung up on a domestic abuse  
10 hotline on or around Christmas Eve. I remember you had  
11 forbidden me from going to Nancy's party. I don't know if it  
12 was before or after that, but I created an account on this  
13 site that I am telling you about, that's how I know of it.  
14 And tried connecting with people with the same problem.  
15 That's what the site is for. You find people going through  
16 the same thing or support people going through hard  
17 situations. It's anonymous and I never did connect with  
18 anyone.

19 December 24th, 2015, 1:58 a.m.: You forbid me from  
20 going to Nancy's and I stayed home and felt helpless like a  
21 victim, and that's the night I called the hotline.

22 Q All right, I am turning to Government Exhibit 301-R  
23 page 327.

24 Agent Rees, you talked earlier about the references  
25 to successor before. I am going to start from December 27th,

Rees - direct - Hajjar

3510

1 2014, 10:44 p.m.

2 Keith Ranieri: No. You have to find someone,  
3 somebody else for us.

4 A I know of a 26-year old virgin, but you won't like her.

5 Q Maybe not. Why?

6 A You only like the pretty ones.

7 Q Not only, but for the purpose of successor the virginity  
8 has to be for certain reasons.

9 A Question mark.

10 Q Was she the exo-eso virgin?

11 A Oh, which one is that? Sorry, which is that one?

12 Q Who is she?

13 A You first.

14 Q Lola's gay cousin?

15 A Question mark -- oh.

16 Q And yours?

17 A I didn't know she had a gay cousin. Name? Is she cute.

18 Q I can get it. No, not cute, plain.

19 Then turning to the next page, page 328 of the same  
20 exhibit. December 27th, 2014, 10:58 p.m.

21 Keith Ranieri: Okay. Get the R situation right.

22 Find other virgin. A third slave doesn't have to be a virgin.

23 A Third?

24 Q A slave would be a third person. I wouldn't want it  
25 without you.

Rees - direct - Hajjar

3511

1 Then turning to page 332 of the same exhibit.

2 December 30th, 2014, 2:59 p.m.

3 Keith Raniere: Does Ana know suitable virgins? You  
4 will create trouble with your beauty and your smile.

5 A Nah.

6 Q Yes. Few rational men or women can resist you. Was nah  
7 for that or the virgin question?

8 A That. I don't know about the virgin question.

9 Q I would so much like to spend time with you.

10 Agent Rees, I just want to note, the times here, it  
11 says 3 o'clock a.m., the messages you reviewed, you said you  
12 reviewed thousands of them.

13 Can you describe the times of day and the frequency  
14 of the messages?

15 A Yes. This would be representative of the time of day  
16 where the bulk of the conversations would occur, either late  
17 at night or in the very early morning hours.

18 Q And the messages, how frequent were the message  
19 exchanges?

20 A Seconds or minutes apart.

21 Q What length of time are we talking about?

22 A Of the messages that I reviewed?

23 Q Yes.

24 A I reviewed messages from August of 2014 through December  
25 of 2015.

Rees - direct - Hajjar

3512

1 Q And in terms of frequency of the messages you reviewed?

2 A Hundreds of messages a day.

3 Q Agent Rees, is the -- are there references in the  
4 WhatsApp messages you reviewed to Camila having a child with  
5 the defendant?

6 A Yes.

7 Q So I am going to turn to page 358 of the same exhibit,  
8 and we'll read from the top starting at January 8th, 2:22 a.m.

9 Keith Ranieri: Just that. If you want my baby, I  
10 want you to say it explicitly.

11 A I understand. I would -- will.

12 Q If you feel that way this moment, it would be good to say  
13 it.

14 A I understand.

15 Q I thought you did at this moment. I'm sorry.

16 A Emoticon.

17 Q This could have been big for us. Goodnight.

18 A What do you mean?

19 Q No more to be said. You needed to be strong and true.

20 A I feel bad. What did I do? Did I say something wrong?  
21 What just happened?

22 Q Deep inside you should absolutely want my baby. If not,  
23 there is something I can't talk about.

24 A Oh. Emoticon.

25 Q If you either don't know that, think differently, or

Rees - direct - Hajjar

3513

1 don't have the conscience to say it, you are not where I had  
2 hoped. Which is it?

3 A I'm close, love.

4 Q Which is it?

5 A I'm not understanding. I'm missing something important  
6 here. I either don't know what. Think differently about  
7 what?

8 Q Wanting my baby enough now to text it.

9 A I do want it.

10 Q Then text it explicitly. I don't understand why you  
11 avoided that.

12 A Because it is not that simple.

13 Q Actually, it is and by rights should be. It's that you  
14 think it's not that scares me about conscience.

15 A Don't. I do want your baby.

16 Q Then all you needed to do was text that in the first  
17 place. Why didn't you?

18 A I don't know.

19 Q That's what really scares me. You need to know why,  
20 apologize for not, because that's what you want and never fall  
21 victim to that process again. You insult our baby by not.

22 A I understand. I think of the circumstances that that  
23 baby would be brought into and that is why I am hesitant.

24 Q You need to be more causative. You caused these  
25 circumstances. You need to uncause them.



Rees - direct - Hajjar

3514

1 A I understand.

2 Q So do from now on and text things like: I want your  
3 baby! And mean them because it will help you cause it instead  
4 of waiting.

5 A Okay.

6 Q Starting now.

7 A Okay. I want your baby.

8

9 (Continuing on the following page.)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar - WhatsApp Chats

3515

1 (Continuing)

2 MS. HAJJAR: Turning to what's in evidence at  
3 Government Exhibit 302-R.

4 (Exhibit published.)

5 Q Can you describe this cover e-mail?

6 A This e-mail is from Cami to Camila@yahoo.com dated  
7 March 4th, 2015, with the subject WhatsApp chat with Unknown  
8 Caller.

9 Q Okay.

10 MS. HAJJAR: And turning to the second page of this  
11 exhibit.

12 (Exhibit published.)

13 Q Starting on January 11th, 9:46 p.m.

14 BY MS. HAJJAR:

15 Q Keith Ranieri: Still I have to ask again. R schedule?  
16 Is it that you don't respect my questions?

17 A Tomorrow I busy, 8 to 12:00. What about R? I guess I  
18 don't get your question.

19 Q Interactions. Any?

20 A No.

21 Q I wish you said things like no, honey. I love you. I  
22 wish you cared enough. So whenever there was a chance you  
23 might run into him, you would eagerly tell me and report  
24 everything that happened without my having to ask. That would  
25 be more loving and caring about the situation and me.

Rees - direct - Hajjar - WhatsApp Chats

3516

1 A Yes.

2 Q Yes, honey, I love you and we'll make it right. That  
3 would have given me more hope.

4 BY MS. HAJJAR:

5 Q Agent Rees, when Keith Raniere says: Schedule, question  
6 mark, and Camila responds: Tomorrow, I'm busy 8 to 12. Is  
7 that a common exchange you saw in these messages?

8 A Yes, that's correct.

9 Q Can you explain that a little bit to the jury?

10 A Keith Raniere would consistently ask Camila to provide  
11 him her schedule and often she would provide it. And then he  
12 would ask repeatedly over for her to continue to provide the  
13 same schedule.

14 Q And these were like daily schedules: Tomorrow, I'm busy  
15 8 to 12?

16 A That's correct.

17 Q Were they sometimes more specific with details about what  
18 Camila was to do every day?

19 A Yes, that's correct.

20 MS. HAJJAR: Okay. I'm turning to page 8 of the  
21 same exhibit.

22 (Exhibit published.)

23 Q This is January 14th, 2:18 a.m.

24 BY MS. HAJJAR:

25 Q Keith Raniere: Probably not a virgin but okay as a

Rees - direct - Hajjar - WhatsApp Chats

3517

1 slave?

2 A I think she's hot but not appealing. Huh. Do you still  
3 want to sleep?

4 Q Yeah, I don't find her appealing but interesting as a  
5 slave. Only if you do.

6 A I can go for a slave, really?

7 Q What do you mean? Of course.

8 A Any preferences in looks? What do you want in a slave?

9 Q Ideally what would you want? What would you like?

10 A I like them younger than me, but don't mind if she's  
11 older, brunette or blonde, not talk or not to talk, innocent  
12 looking, hee hee hee.

13 Q Virgin?

14 A For me? No. For you, yes.

15 Oh, that was tall, not talk.

16 Q Can have more than one. But if you found a successor, we  
17 could be together forever.

18 A Okay.

19 Q I like shorter than me. Younger than you is fine. Just  
20 so they have character which they would have to prove through  
21 obedience.

22 A Got it.

23 Q And?

24 A Hmm. Do you mean obedience as in slave-type obedience?

25 Q Yes, but in other ways, too. Obedience is good, don't

Rees - direct - Hajjar - WhatsApp Chats

3518

1 you think? Wink. Wink.

2 A Not in a slave-type. I'm not into that. But yes. I  
3 don't like the whole dominatrix thing.

4 Q Yes, but if you now obeyed me absolutely, we would be  
5 better off. Obedience for her in the form of tests of  
6 loyalty. Wink. Wink.

7 A That's why I said but yes, I am agreeing with you FYI.

8 Q So when will you locate a first candidate we can  
9 consider?

10 A In the next few days. I'll look locally but not within  
11 the community, unless you want me to.

12 Q I agree. It would have to be a rare circumstance to find  
13 someone within this community. How will you look outside?

14 A I don't know yet. We'll figure it out.

15 Q You might be able to get some help unbeknownst to the  
16 giver of the help by people in the community. Some of them  
17 would bring you to people in Mexico though so more difficult.

18 A Question mark. In Mexico? Why Mexico?

19 Q Some of the women who might aid you are from there or  
20 Texas.

21 A I'm not following. I am so sorry. Are we still talking  
22 about a girl?

23 Q Yes.

24 A Okay.

25 MS. HAJJAR: And this continuation of the next page.

Rees - direct - Hajjar - WhatsApp Chats

3519

1 BY MS. HAJJAR:

2 Q Keith Ranieri: Some of our community members have  
3 noncommunity friends of the proper age, et cetera. Mostly in  
4 Mexico, I think?

5 A I'm going to try to sleep again. Okay. Gotcha.

6 BY MS. HAJJAR:

7 Q And then at 6:10 p.m.

8 BY MS. HAJJAR:

9 Q Keith Ranieri: I wish you would write. I've gone back  
10 and forth to several women in the intensive on quite extensive  
11 matters and I have not gotten a word from you. Am I really  
12 that unimportant?

13 A No, love. I have a shitty phone. I can only charge a  
14 little bit at a time. It has been intense emotionally. I'm a  
15 little overwhelmed. How are you? Do you miss me? I have  
16 been thinking of getting a girl.

17 Q Why didn't you text during lunch?

18 A I am staff but honestly I've been a little out of it. I  
19 feel overwhelmed.

20 Q Why?

21 A I am sorry, love. Because of the first intake sheet.  
22 Your choice of questions.

23 Q Why did that affect you negatively?

24 A Media omitted. A little bit.

25 Q Is she available?

Rees - direct - Hajjar - WhatsApp Chats

3520

1 A I can find out.

2 BY MS. HAJJAR:

3 Q Agent Rees, the media omitted. You testified earlier  
4 that when you exported chats from your phone, there was a  
5 notation image omitted.

6 A That's correct.

7 Q Is that an option in WhatsApp to omit media when  
8 exporting chats?

9 A That's correct.

10 Q So 8:00 p.m.

11 BY MS. HAJJAR:

12 Q Is she available?

13 A I can find out.

14 Q Fits the profile, do you?

15 A She might be. Then I have to ask if she minds my older  
16 boyfriend.

17 Q One step at a time.

18 A Media omitted. Media omitted.

19 Q The first is the best for me. She also looks  
20 energetically best. Why upset by the question on the intake  
21 form? What part upsets you? What are their names? My  
22 assumption is they are not ESPians, Tindr-derived or the like.

23 A Right, not ESPians.

24 MS. HAJJAR: Turning to the following page at

25 4:12 a.m. January 15th.

Rees - direct - Hajjar - WhatsApp Chats

3521

1 BY MS. HAJJAR:

2 Q Defendant writes: By the way, I am -- I suspect I'm a  
3 pretty sellable guy beyond being just an older boyfriend.  
4 Maybe in more marketing sensitive approach may be useful.

5 MS. HAJJAR: And then I'm going to skip to page 31.

6 January 25th, 2:00 p.m.

7 BY MS. HAJJAR:

8 Q Keith Raniere: Why did it plummet?

9 A My fear and out-of-causeness.

10 Q Fear and out-of-causeness about what specifically? Why  
11 would that make it drop?

12 A I felt unsafe and that fed into not wanting to. So then  
13 I felt more unsafe and then, et cetera.

14 Q When did this start?

15 A Thanksgiving.

16 Q Why then?

17 A The first time I felt conditioned by you.

18 Q Conditioned how?

19 A Like I wanted to leave. I felt blackmailed. Emphasis on  
20 felt.

21 MS. HAJJAR: Turn to page 34 of the same exhibit,

22 January 27th, 9:27 p.m.

23 BY MS. HAJJAR:

24 Q Do I disgust you physically?

25 A No, my lovey. You are delicious.



Rees - direct - Hajjar - WhatsApp Chats

3522

1 Q Oh, what did the emoticon mean?

2 A It was too abrupt but I am not disgusted by you.

3 Q Ideally nothing could ever be too abrupt between  
4 authentic lovers. Otherwise, it can never be safe or genuine.  
5 I wish you could figure out how I could ever be too abrupt for  
6 you. Maybe that reaction can trace to something truthful, an  
7 area of pride perhaps.

8 You can never be too abrupt with me unless you act  
9 out of fear and not love. I guess in thinking about it, I am  
10 very sad. Anything could be too abrupt.

11 A It feels violent. It feels like I am a thing and that  
12 scares me. I will look at it more.

13 Q So agent Rees, have you also reviewed photographs that  
14 were provided by Google in response to a search warrant for  
15 the vicibaby@gmail.com account?

16 A Yes, I have.

17 Q And is it fair to say that some of these photographs are  
18 nude photographs of Camila?

19 A Yes, they are.

20 Q Graphically nude photographs of Camila?

21 A That's correct.

22 MS. HAJJAR: Turning to page 43 of Government's  
23 Exhibit 302.

24 (Exhibit published.)

25 MS. HAJJAR: I'm going to start reading from

Rees - direct - Hajjar - WhatsApp Chats

3523

1 February 1st, 7:46 p.m.

2 BY MS. HAJJAR:

3 Q The picture, do I get your face in it too, an imitation?

4 A Yes. When I look better. Right now I am super-puffy and  
5 unattractive.

6 Q But it's for me. Make me the very best one you can and  
7 one you would never send to anyone else ever.

8 A I look yucky, hon. Can I send you one tomorrow?

9 Q Then make it a special pussy shot. Invite me like you  
10 would invite nobody else. Yes on tomorrow also.

11 A Okay. I will make it a special one.

12 Q Make yourself look your greatest.

13 A Will do, honey.

14 Q Waiting with great expectations.

15 A Oh, boy, no pressure.

16 MS. HAJJAR: Okay. Switching to the next page,  
17 page 44 at the top.

18 (Exhibit published.)

19 Q Can you read the highlighted portion starting at  
20 7:55 p.m.?

21 A Oh, I'll show you. Are you still with R?

22 Q Now, not with R anymore. At airport. Show me now.

23 A Still no face but see how she's open saying feed me. Are  
24 you by yourself?

25 Q Sort of. Nancy is near and in public waiting at gate.

Rees - direct - Hajjar - WhatsApp Chats

3524

1 A Guard these pics, okay?

2 Q Yes, of course. You have copies? You know I guard the  
3 other pictures, right?

4 A I have copies. And original.

5 Q They're off my phone. You know I have the others, yes?

6 A From way back when?

7 Q I wanted the original forever. I thought it was truly  
8 mine. Yes, from way back.

9 A Oh, my honey, I am so sorry.

10 Q Can you get me another and will you give me what is left  
11 forever?

12 A Phone froze. Give me a sec. Not working.

13 MS. HAJJAR: All right. I'm going to skip to the  
14 page 56 of Government's Exhibit 302-R at 2:24 p.m.

15 (Exhibit published.)

16 Q Our future --

17 MS. HAJJAR: Actually, the line just before that.

18 BY MS. HAJJAR:

19 Q Camila says: I didn't say I was going to write a letter  
20 to Jim, I want to talk to him?

21 Keith Raniere: Our future. If you don't convince  
22 me, I will leave. As of right now, I will get over the next  
23 months exactly what I got over the last months. After my  
24 waiting for you, hurting myself to keep some door open, you  
25 repay me with more betrayal and dishonesty on top. I don't

Rees - direct - Hajjar - WhatsApp Chats

3525

1 want this anymore. I'm giving you a chance to change and  
2 prove it.

3 Talking to him is probably the inferior option. You  
4 have to tape it. Rehearse it. Guarantee exactly what you  
5 will say and how you will say it and say no more.

6 I don't trust you. A letter is more trustworthy.

7 A A letter is cold.

8 Q Look what happened when I trusted you to end things with  
9 R in one day. Yes, a letter is colder, but considering what  
10 you did, you need to be cold. You have already damaged  
11 everything with him and Esther.

12 A What? How?

13 Q Agent Rees, the discussion of a letter to Jim, is this a  
14 frequent subject of conversation in these WhatsApp messages?

15 A That is correct.

16 MS. HAJJAR: Okay. And turning to page 64 of the  
17 same exhibit.

18 (Exhibit published.)

19 MS. HAJJAR: I'm going to start from 10:03 p.m.,  
20 February 5th, that's a few lines down.

21 BY MS. HAJJAR:

22 Q Keith Ranieri: What is the absolute deadline then?? Why  
23 are you so unresponsive? What happened again to you?

24 A Hmm, I've been next to my phone. I did not hear your  
25 messages drop. I am so sorry.

Rees - direct - Hajjar - WhatsApp Chats

3526

1 Q Deadline? Deadline?

2 A I don't know. I wanted to do it tomorrow.

3 Q Now, these messages, Agent Rees, if you just refer back  
4 to the top of this page.

5 The defendant says: Can you have the thing for  
6 reversing the situation with Jim done in an hour?

7 And based on the context of the messages here, is  
8 this referring to a letter to Jim?

9 A That's correct.

10 Q Turning to the next, to page 67 of the same exhibit.

11 (Exhibit published.)

12 BY MS. HAJJAR:

13 Q February 6th, 1108, a.m.

14 If you have a choice of having sex with Jim or me,  
15 who would you choose? It still has the same problem. I sent  
16 you back one. I am so sad you didn't write it. Please answer  
17 my question. Just send the second draft that contains all  
18 necessary therapeutic elements. Please answer my question.  
19 It is insulting when you wait.

20 BY MS. HAJJAR:

21 Q I'm going to turn and direct your attention to what's in  
22 evidence as Government Exhibit 1784.

23 (Exhibit published.)

24 Q Agent Rees, in had the e-mails that you've reviewed from  
25 vicibaby@gmail.com, are there drafts of letters addressed to

Rees - direct - Hajjar - WhatsApp Chats

3527

1 Jim sent between KeithRaniere@yahoo.com and Camila?

2 A Yes, there are.

3 MS. HAJJAR: If you could just scroll down to the  
4 bottom, Ms. Carby, thank you.

5 Q This is a -- the e-mail at the bottom. Can you read the  
6 time and the first paragraph, please.

7 A On Tuesday, February 16th, 2016, at 6:31 p.m.,  
8 Vicibaby@gmail.com wrote:

9 Who are the biggest changers? It is still  
10 disorganized despite that but wanted your thoughts before I  
11 moved stuff.

12 In blue: I don't blame you, I blame myself but  
13 either way, I can't be around you. I thought we were in the  
14 same page about what happened and there was nothing further  
15 that needed to be said, but there were several interactions  
16 during this past training that make me think this is not the  
17 case.

18 Q Now, Agent Rees, are there many e-mails back and forth  
19 around this time period with Cami and KeithRaniere@yahoo.com?

20 A Yes, there are.

21 Q And are they drafts of a letter like similar to the  
22 content of this the text of this e-mail?

23 A Yes.

24 Q Based on the context of those messages and this one, can  
25 you explain what's going on with the text in blue and the text

Rees - direct - Hajjar - WhatsApp Chats

3528

1 in black?

2 A Cami is writing an e-mail to Jim regarding sexual contact  
3 that the two of them had. She sends these e-mails to Keith  
4 and he provides edits.

5 MS. HAJJAR: So if we could just scroll up slightly  
6 on the same page.

7 This top e-mail is an e-mail to Keith Raniere from  
8 Cami and it has certain changes.

9 Can you read the first paragraph, please?

10 A Hi Jim. I was uncomfortable with some of the  
11 interactions during the intensive and the vibe that I'm  
12 getting from you. I just want to clarify a few things.

13 Q And can you read the text of this e-mail, please?

14 A I left a lot of things unsaid that should have been said.  
15 I should have written this long ago, but seeing you in the  
16 training made me realize how I clearly feel about you and what  
17 I did. I will no longer let it go unsaid.

18 Last year there were many times I failed to do what  
19 was right with you. I made many bad decisions and I let my  
20 fears and my insecurities cloud my judgment. I feel bad that  
21 I let it go as far as it did and I didn't stop it much sooner.  
22 I feel embarrassed now every time I look at you because I felt  
23 forced to let you touch me unless I felt forced to take off  
24 the bra so you wouldn't hurt yourself.

25 I took off the bra because I felt I had no choice,

Rees - direct - Hajjar - WhatsApp Chats

3529

1 not because I actually wanted you to touch me. Every moment  
2 felt like an out-of-body moment, car crash, disaster and I  
3 couldn't stop. Being liked was a big factor in my decisions  
4 and I just don't -- when I took it all the way to that moment.  
5 I liked that you liked me. It felt good, but I did not want  
6 to be sexual with you.

7 Q Agent Rees, I'm just going to pause there.

8 Are there many more iterations of this letter in  
9 e-mails back and forth between Keith Raniere and Camila?

10 A Yes, there are.

11 Q Okay. And are there many references to this letter also  
12 in the chats that you've reviewed, the WhatsApp chats?

13 A Yes, there are.

14 MS. HAJJAR: I'm going to -- if you could just read  
15 the last line in blue. It's the second page of Government  
16 Exhibit 1784?

17 (Exhibit published.)

18 A I hope from now we can be cordial if we do cross paths  
19 but I will choose to refrain from interacting with you unless  
20 absolutely needed.

21 MS. HAJJAR: So I'm going to turn to page 71 of --  
22 actually, skip ahead to page 35 of Government Exhibit 301-R.

23 (Exhibit published.)

24 Q February 7th, 8:52 p.m.

25 Q Keith Raniere: I refuse. Good-bye, that's just too



Rees - direct - Hajjar - WhatsApp Chats

3530

1 prideful, untrue and entitled?

2 A This is what you just presented. How many options are  
3 you leaving me?

4 Q You are the abuser. If there is such a thing as unfair,  
5 you are taking and destroying it.

6 A I could argue that, but it is not that important right  
7 now.

8 Q Return everything you destroyed. Feel the same pain as  
9 me. You can keep all of the other benefits and we will call  
10 it starting to be fair. You can't really argue that. You're  
11 wrong.

12 A I only have one option. I seriously feel like you are  
13 going to hunt me down and make my life a living hell if I  
14 don't choose what you want.

15 Q I can see you at around 9:30, for sex, for a reason. You  
16 need to not be prideful and lovingly satisfy me. Let's see if  
17 you can.

18 MS. HAJJAR: Turn to the next page which is  
19 Government Exhibit 302-R, page 76.

20 (Exhibit published.)

21 Q Can you read the highlighted portion for Camila?

22 A 8:59 p.m.

23 No, no, no. I don't mean to say that it is fair  
24 based on what I did to you. I did something awful to you.

25 That is not fair. You're left at a disadvantage in that

Rees - direct - Hajjar - WhatsApp Chats

3531

1 regard. What I am saying is not fair is your position in the  
2 organization and your power versus mine. You have already  
3 said that there will be lots of shit. I don't want to have  
4 sex like that. That seems awful. Well, we'll see if I can  
5 satisfy you.

6 Q I earned my power and earned it by using it justly.  
7 There is nothing unfair about our relative positions. You  
8 give me nothing. I give you much because of those relative  
9 positions. You had one thing you gave me to hold all of the  
10 benefits. You gave that away and still, and can't give it to  
11 me. By rights, you should not ever have had the benefits.

12 MS. HAJJAR: Just the same page, page -- at  
13 2:04 a.m.

14 Q Can you read Camila's portion, please.

15 A By the way, I never wanted you to correct me. That's one  
16 of the things are anger me. That because you know more than  
17 you think, you have the authority to correct me, whether asked  
18 for help or not. It angers me that you think everything right  
19 and cause me no pain in our years together. I felt jerked  
20 around most of the time. It angers me that you did not uphold  
21 what I thought you claimed. I remember being in awe of you  
22 for being willing to step down for someone else if I loved  
23 them. I'm angry that you disguised things as logical and  
24 righteous when sometimes they are just emotional and human.  
25 I'm angry that you crippled me for so many years and now use

Rees - direct - Hajjar - WhatsApp Chats

3532

1 that handicap against me. I am angry that you made me believe  
2 in fairy tales and the blueprints when it is all a lie. I am  
3 angry that you moved your entire life and planned my life  
4 without my consent, and that all those things were your  
5 choice, but blame me for them when I didn't even know what you  
6 were doing. I'm angry that because of you, I have no close  
7 relationships because I always had to lie to them about this  
8 other part of my life. I am angry that because of you I am  
9 such a good liar.

10 Q Can you read this.

11 A I am angry that because of you I started my bulimia and I  
12 am angry that for so long you completely ignored it when I  
13 desperately needed help. I'm angry you now use it against me.  
14 I am angry at you because I always felt I wasn't good enough  
15 because I couldn't understand why you needed to be with other  
16 women and not just be with me. I am angry I lost so many  
17 years of common learning experiences because of you. I am  
18 angry at you because you couldn't see how being with me at  
19 such a young age was probably taking away from my life and  
20 opportunities. And I am just plain sad to learn that love is  
21 not that poetic something that is so deep and indescribable  
22 but, in fact, a trade. For so many years I forgot about the  
23 darkness. I thought the world was bright and beautiful and  
24 I'm angry that in the last few months I've contemplated  
25 suicide countless times and everything is done.

Rees - direct - Hajjar - WhatsApp Chats

3533

1 Q The same -- the next page, same exhibit. February 8th,  
2 4:34 a.m.

3 BY MS. HAJJAR:

4 Q Keith Ranieri: I took great pains to legitimize our  
5 relationship from the start. I asked permission from both  
6 your sisters. I kept on asking you why you turned out  
7 different from them, et cetera. From this I gained a type of  
8 earned authority. When Hoyboy happened, we spoke at length  
9 about the nature of consequences and extra time which needed  
10 to be added on, et cetera. I told you at Toni Natalie and how  
11 I took on a great weight to rehabilitate her word, et cetera.

12 I told her it would be about seven years to do this.  
13 I told you the same, but I told you I would build a life so  
14 that when the test came, if you passed it, we would be free of  
15 my life responsibilities that stood in our way. There was a  
16 lot more to this. When I saw the morality results from V  
17 week, I was shocked. You had a preconventional outlook.

18 If I really did start with you too young, I lose all  
19 authority on which our whole relationship was based and my  
20 definition of love and my belief in women. Everyone had  
21 betrayed me except you and your sister and beauty, et cetera.

22 If my authority rests on this fault, I can't use it  
23 beside all the penance activity I've already started here's  
24 the irony. If you had dropped your pride at any moment, at  
25 any point, and listened to me, I could have rehabilitated

Rees - direct - Hajjar - WhatsApp Chats

3534

1 everything. If you didn't listen to me, things will go as  
2 they do and you will not get enough pain to match my pain and  
3 thereby never be aware of what you do and not build a big  
4 enough conscience.

5 I hoped, if you just you surrendered your pride this  
6 hell would end. That was true. But I can't lie. You now  
7 have a reason to keep your pride. Pride doesn't go away by  
8 itself. Only through both extreme pain and humiliation. But  
9 your pride has won. It owns me. I can't argue that point if  
10 it's true. I no longer have the authority to help. Both of  
11 us are now subject to your pride as king.

12 I need to be king to fix this and defeat your pride.  
13 I still, I can still demand certain exchanges, but I can no  
14 longer help you. The base of my ascension to a trusted fake  
15 authority to guide us has been destroyed by this fact. I took  
16 every precaution I could, but your belief says I failed. To  
17 get rid of your pride, you must view me as infallible in this  
18 area.

19 THE COURT: All right. I think we will take our  
20 lunch break now.

21 All rise for the jury.

22 THE COURTROOM DEPUTY: All rise.

23 (Jury exits.)

24 (In open court; outside the presence of the jury.)

25 THE COURT: All right. The witness may stand down.

Rees - direct - Hajjar - WhatsApp Chats

3535

1 Do not discuss your testimony with anyone.

2 We will take an hour for lunch.

3

4 (Continued on following page with AFTERNOON

5 SESSION.)

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar

3536

1 AFTERNOON SESSION

2 (In open court; jury not present.)

3 (Judge Nicholas G. Garaufis enters the courtroom.)

4 THE COURT: All right bring in the witness, please.

5 (Witness takes stand.)

6 THE COURT: Please bring in the jury.

7 (Jury enters the courtroom.)

8 THE COURT: Please be seated.

9 You may continue with your examination of your  
10 witness, Ms. Hajjar.

11 I remind the witness she is still under oath.

12 THE WITNESS: Yes, Your Honor.

13 BY MS. HAJJAR:

14 Q Good afternoon, Agent Rees.

15 A Good afternoon.

16 Q Now, Agent Rees, I am going to direct your attention to  
17 what's in evidence as Government Exhibit 302-R, page 95, and  
18 on February 10, 3:40 p.m., Keith Raniere:

19 Did you keep the hair? They're supposed to be mine.

20 A I know. I didn't think of that until after. I didn't.  
21 I'm so sorry.

22 Q How did you fix? How much did you trim? Where?

23 A Just the long parts that were pulling on me.

24 Q How do you make this up to me? There is the issue of  
25 your hair, but there are two more important issues; your word

Rees - direct - Hajjar

3537

1 you wouldn't, also that you didn't think of me and save it.  
2 How can you experience enough pain so it matches mine plus  
3 some and you wouldn't do that class of transgressions ever  
4 again?

5 Now, Agent Rees, this discussion of hair, cutting  
6 hair, is that a theme that features a lot in these messages  
7 that you have reviewed?

8 A Yes, it is.

9 Q And I'm turning to the next slide which has excerpts of  
10 some of these messages.

11 Can you describe the type of messages that deal with  
12 cutting hair, alterations to hair?

13 A At some point throughout the WhatsApp conversations,  
14 Camilla will talk about wanting to change her hairstyle or  
15 haircut or how she maintains hair on her body, in which Keith  
16 Ranieri demands to know how she's going to change it, why and  
17 often advises her against it.

18 Q And are these messages excerpted from December 30 and  
19 31st about Camilla dying her hair and the Defendant's  
20 responses?

21 A That's correct.

22 Q I am going to turn to Government Exhibit 302-R.

23 If we can start at February 12, 3:30 p.m., and if  
24 you could read the highlighted portion?

25 A I'm trying to do what's right here.



Rees - direct - Hajjar

3538

1 Q Not true. If I were coaching someone and heard this, it  
2 would be chilling.

3 A You really want me to be that horrible person you made up  
4 in your mind. You are wrong.

5 Q Chilling.

6 A Yeah, you can say that to anything anyone says and it is  
7 very powerful with little backup, like saying something is  
8 evil or a cult.

9 Q Please move out. Sadly, I'm correct.

10 A Please don't assume anything in my tongue. I'm trying to  
11 do the right thing.

12 Q No, you are very far away from that. I believe that it  
13 is beyond you.

14 A I can and will move out, but I don't want you to think  
15 that I am bad, scary, or anything you are thinking I am.

16 Q Move out.

17 A Immature, maybe. No, definitely immature.

18 Q No, and I need to act accordingly. Immature do not do  
19 these things.

20 A Since when do you lose hope in people?

21 Q When they damage too much and demonstrate they won't  
22 change, can't change or too prideful to change. I am  
23 responsible to many others.

24 A What are you doing? What am I missing? This seems to be  
25 the worst thing you can do to a human being to pass a verdict

Rees - direct - Hajjar

3539

1 such as this, especially when you are wrong, especially when  
2 there was hope.

3 Q This is the hardest and harshest thing for me to do. It  
4 is the last ethical resort. I'm not wrong about my verdict  
5 with respect to my process. This is what counts. My process  
6 may be imperfect, but the mistakes are outweighed by the right  
7 thing to do. If I were wrong about you, you would be saying  
8 and doing far different things. It seems everything you are  
9 doing is supporting this verdict, not saying something is one  
10 of those things.

11 A I am researching methods.

12 Q Methods of?

13 A To die. Of what you say is true and there is no hope,  
14 then there is no point for me to be around. I can't put  
15 others in danger.

16 Q More of the same response; you'd rather die than do the  
17 right things or break your pride. Breaking your pride at this  
18 point would be assuming you are wrong completely.

19 Agent Rees, when the defendant says you'd rather die  
20 or break your pride, were there frequent references to pride  
21 in the messages that you reviewed?

22 A Yes, there were.

23 Q I am going to turn to the next slide and this is slide  
24 107.

25 Does this have excerpts of some of those messages

Rees - direct - Hajjar

3540

1 from Government Exhibit 301?

2 A That is correct.

3 Q And the references to bad pride, pride, too much pride,  
4 pride and anger, being too prideful?

5 A Correct.

6 Q This is from Government Exhibit 301, the next slide and  
7 certain excerpts, December 10, 2014, 1:23 a.m.:

8 How are these rules insane? I'm going to need to  
9 stop for tonight, this is too tiring. We're so far apart and  
10 can't see you changing. At this point I believe you are  
11 prideful. I won't fight pride. I am leaning towards walking  
12 away.

13 And then the following excerpts again refer to --  
14 Keith Raniere referring to pride?

15 A Correct.

16 Q I am going to skip to page 143 of Government Exhibit  
17 302-R. At the top, February 20, 5:02 p.m., Keith Raniere:

18 You're cooking for people is involved in a few ways  
19 with your breaches.

20 A Question mark. I have no money.

21 Q There are other ways. I told you I would pay for  
22 legitimate work. I will have to pay someone else if not you.  
23 I pay more. You're settling for low pay work for your time.

24 A I thought you took that off the table. I am more than  
25 game for that.

Rees - direct - Hajjar

3541

1 Q I think you should not cook for anyone but me and do my  
2 work that I need.

3 A Game. I committed to it already.

4 Q Uncommit and get someone else. I'm very concerned about  
5 tonight because the Jim thing is not resolved and he will be  
6 there.

7 A I'm feeling a bit thwarted with these things. These are  
8 things that develop skills to generate options to earn in the  
9 future. Why do you want me to not have that?

10 Q My things develop better skills.

11 A Options. Options. Your thing is dependent on you.

12 Q And past 144, page 148, and looking at 153. This is  
13 February 22, 12:25 p.m., Keith Ranieri:

14 I've taken on too much, my body is not supporting  
15 it.

16 A What's going on?

17 Q For some reason my phone was not sending or receiving.  
18 I'm really bleeding.

19 A Mine too.

20 Q I need you to drop your pride and love me purely.

21 A Literally bleeding?

22 Q Yes.

23 A Do you need me to call anyone?

24 Q No, it won't help.

25 A Will you be okay?

Rees - direct - Hajjar

3542

1 Q I have many doctors at my disposal. I don't know. Every  
2 time you're angry or prideful, I take on more.

3 Agent Rees, the last message of this particular  
4 attachment is on March fourth?

5 A That's correct.

6 Q So, showing you what's in evidence as Government Exhibit  
7 1753, is this another e-mail from Camilla to Camilla attaching  
8 a WhatsApp chat with an unknown caller?

9 A Yes, it is.

10 Q What's the date of this e-mail?

11 A March 15, 2015.

12 Q And looking at the beginning of the first page of the  
13 attachment, does that leave off where the last exhibit ended?

14 A It does.

15 Q And turning to page 5 of Government Exhibit 1753, March  
16 6, 2:26 p.m., Keith Raniere:

17 Did you make a life commitment to me yesterday?

18 A Yes and no. Please explain. I am scared shitless and  
19 feel a loss, but at the same time it is the best gift I could  
20 give you and us. I am telling you that you are more important  
21 than happiness, kids, the house, the job. I hold you higher  
22 than any of those. That is how much I want love to weigh in  
23 me, more than anything. That is why yes and no. I am saying  
24 goodbye to everything I want, but I know that I am choosing  
25 love and now I know how valuable I want it to be. So yes, I

Rees - direct - Hajjar

3543

1 made a life commitment.

2 Q Okay. I am going to skip ahead to page 25 and starting  
3 from March 12, 8:56 p.m., Keith Ranieri:

4 Good method. I am in a far more intense situation.  
5 I love more and stronger. I sacrificed far more. I've lived  
6 far longer and you are far more selective and the stuff you  
7 don't understand you were my parampara and my purpose is  
8 diminished because of it.

9 A You're what? Parampara?

10 Q Spiritual successor through transmission of energy and  
11 innate knowledge. My lineage is not supposed to end with my  
12 death. It will likely now which diminishes my purpose and its  
13 strength. I may not live too long once a few more things are  
14 finished.

15 A I can't even breathe when you say that much less say  
16 anything.

17 Q What do you mean?

18 A It is beyond heartbreaking. It is terrifying,  
19 paralyzing, overwhelming, sad, frightening. Brings deep, hard  
20 emotions.

21 Q It is what is. There were three paths. One, if I didn't  
22 find a parampara, I would live an extended life. Two, finding  
23 a parampara, my life would also live through her with me as  
24 her. Three, I start to go through the process which mortally  
25 weakens me and then it is cut off and my purpose for being

Rees - direct - Hajjar

3544

1 here is thwarted.

2 A This is beyond my comprehension, but it is important to  
3 you.

4 Q Agent Rees, have you also reviewed additional WhatsApp  
5 messages between Camilla and Robbie Chiappone?

6 A Yes, that's correct.

7 Q I'm showing you what's in evidence as Government Exhibit  
8 1754.

9 Is this another e-mail attaching WhatsApp messages  
10 between Camilla and Robbie?

11 A Yes.

12 Q I'm going to show you a few of these messages, but they  
13 are similar as to the ones we have already reviewed?

14 A That's correct.

15 Q I'm now showing you Government Exhibit 307-R, page 15, at  
16 the bottom, March 26, 10:20 p.m.

17 Can you start reading from the highlighted portion,  
18 please?

19 A Did you know I worked with Nancy today?

20 Q No. Is that who you EM'd with?

21 A What have you told her about me? Or why would she know  
22 that we are close or that I've changed my thought object of  
23 you?

24 Q Nothing. She knows we are close. I've always maintained  
25 to everyone, including your sister, that I believed I was

Rees - direct - Hajjar

3545

1 always the closest person to you and that we had a unique bond  
2 because I have always said that during the years. I helped  
3 you a lot and did many things for you. I have no idea about  
4 the thought object thing. Was your EM about me?

5 Now, turning to the next page, page 16 at 11:48  
6 p.m., can you read the highlighted text?

7 A I'm never sure how to sanitize to work on stuff related  
8 to you. It made me very uncomfortable when Nancy mentioned  
9 you.

10 Q Nancy has always known there was something extraordinary  
11 between us.

12 A Yeah, but how did she know to bring it up?

13 Q I can only guess. I can ask. My assumption is you  
14 either said something about me or I was conspicuously absent  
15 at some point. One of the things we see is conspicuous  
16 absence.

17 A Question mark. Conspicuous absence?

18 Q Yes. A person speaks in a context and distinctly does  
19 mention something that should be there. If you were speaking  
20 about the closest people to you and you didn't mention me, it  
21 would raise the question.

22 A I wasn't.

23 Q All right, I am going to turn to Government Exhibit  
24 308-R.

25 Again, is this an e-mail from Camilla to Camilla



Rees - direct - Hajjar

3546

1 attaching the WhatsApp chat with unknown caller?

2 A That's correct.

3 Q And turning to page 15, starting at the top, April 7,  
4 5:17 p.m., can you read the highlighted portion of Camilla?

5 A I will text on the life commitment although it's pretty  
6 long.

7 Q Long, detailed, firm commitments are good. Long texts  
8 are what I hope for. What have you been doing? What happened  
9 to the long text?

10 A It's coming.

11 Q Are you home all night?

12 A The life commitment is a process thing. There was  
13 something during emphasis, whether either said it or I  
14 interpret it. Like I had to lose hope. So I realize that as  
15 long as I kept waiting for you, our year to be up -- I'm  
16 sorry, as long as I kept waiting for our year to be up, I  
17 would never feel the pain of your loss. Up until that point,  
18 I had been waiting for the year to be up, waiting to be set  
19 free. Giving you my life was my way of removing all possible  
20 escape routes. It was also because I wanted it to symbolize  
21 how much I can value something even beyond happiness, life,  
22 children, the house or the career?

23 Q I think I understand. So what is the exact full  
24 commitment?

25 A The part that I struggle with is that I thought I'd be in

Rees - direct - Hajjar

3547

1 love with you again after making that commitment and couldn't  
2 hurt you any more. The reason that I was dubious after that  
3 was because now you are stuck with me, only to continue to be  
4 hurt. The feelings didn't follow as I thought they would.

5 Q You have to work to repair them. It would be nice if  
6 breaches allowed for effortless repair. Actually, that would  
7 be terrible because nothing would have value. In this case  
8 the effort you put in to repair this love would be the value  
9 and strength of your love. No effort in it means nothing.  
10 How strong and valuable do you want your love to be. The  
11 commitment gives the opportunity to have a valuable love.  
12 Without it, you are just waiting a year at giving me, you, us  
13 love, none of it.

14 So am I to assume you will never leave me, never be  
15 with anyone else no matter what?

16 A I feel like I just died a little bit with that question.

17 Q I thought that was your commitment. Wouldn't you have  
18 died all the way when you made it?

19 A Yes, you just reminded me, it feels like death.

20 Q Why?

21 A It feels like everything is pointless, like there is no  
22 more seeking anything. I should just accept that this is it.

23 Q Do you want me to stop in?

24 A You can if you want.

25 Q Noncommittal answer, I won't then. I am really having

Rees - direct - Hajjar

3548

1 trouble with your noncommittalness [sic] and lethargy. Today  
2 was open and important day for us to spend time, but you need  
3 desire to spend time and make it good so you can repair love.  
4 Every time you miss an opportunity you make it worse. You are  
5 either building or destroying like sinking, swimming, there is  
6 no in between. Today you made it worse. Ideally, you would  
7 have pushed hard to see me. Even when I finally asked, you  
8 did not value an opportunity to see a valuable person, me.  
9 You took it for granted and said if I wanted. No one in the  
10 organization would respond that way to me. For to them, I'm  
11 important. To you, I'm not.

12 A I said you could.

13 Q That's not the point. That's very out of cause and/or  
14 devaluing.

15 A Question mark.

16 Q Other people would say yes, that would be fantastic, I  
17 would love to see you.

18 A Okay. I really did not think you wanted me to treat you  
19 like the leader of the organization. We had a romantic  
20 relationship. You are that to me first and then Vanguard.

21 Q You're right. You should treat me even better.

22 A But I will absolutely abide by that. I will treat you  
23 like anyone else if that is what you want.

24 Q Okay. I am going to turn to page 49 of the same exhibit,  
25 from the bottom, April 19, 8:00 p.m., Keith Raniere:

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3549

1 I'm sorry, I'm working too hard at this. My time  
2 right now is almost up. Why won't you stay on line, don't  
3 forget my other question. Last time I can call tonight.

4 A I need to correct something I said, but don't know if I  
5 should do it in person. I am afraid it means the worst and  
6 I'm sorry I lied.

7 Q I am going to skip to the -- well, Agent Rees in your --  
8 are there lots of references in these messages you have  
9 reviewed to the vow and making a life commitment?

10 A Yes, there are.

11 Q And interspersed with these messages are there  
12 discussions of R or Robbie?

13 A That's correct, there are.

14 Q And, so, turning to page 50 at the top, 8:06 p.m. April  
15 19, Keith Raniere: Happened twice?

16 A Three.

17 Q Anything else that is bad? Three in the one night or two  
18 and once in the car?

19 A The latter.

20 Q Why would you not do that with me?

21 A I don't know how to answer that.

22 Q Honestly?

23 A Physical attraction.

24 Q It was false, unfortunately. Is he circumcised?

25 A Yes.

Rees - direct - Hajjar

3550

1 Q I'm sorry, I'm in such pain. Please write me an  
2 extensive plan. I don't know what to do about oral sex. It's  
3 vitally important but our -- I will likely stop texting  
4 suddenly. Don't stop.

5 What underwear did you wear?

6 A Physical stuff, that's it? Didn't.

7 Q What outerwear? Not only physical stuff.

8 A I think jeans and a T-shirt.

9 Q How quickly do you think you can make it far more primal  
10 with me?

11 A No clue.

12 Q And then, turning to page 51, April 19th, 8:31 p.m.,  
13 Keith Ranieri:

14 Will you please make your plan extensive. I don't  
15 know if I can or should have sex with you because it will --  
16 it has to make that all worse.

17 A I will.

18 Q Also about the sex, I don't know what to do. You need to  
19 decide. Sex is very important, especially now. Coming in you  
20 and in your mouth is vitally important, but you have to like  
21 everything better about it and I can't reconcile that.

22 Question mark.

23 A I thought you were not asking anything.

24 Q Help me with the sex.

25 A Okay.

Rees - direct - Hajjar

3551

1 Q Please include near-term sex in your plan. Text me when  
2 you're up.

3 A Sort of.

4 Q If you could just scroll down and if you could read the  
5 highlighted portion starting at 11:39 p.m.?

6 A April 19th: Yeah, but I will. Plan. Letter. Pledge.  
7 Robbie. Lot of sex. Blow jobs. Making you my hero.  
8 Dressing sexy for you. Losing weight. Keeping house clean.  
9 Cooking. Date nights. Disclose everything. Delete tender.  
10 Clean thought object with Lucy.

11 Q 11:40 p.m., April 19th, Keith Raniere:

12 Why delete tender? I think that might be the wrong  
13 thing to do. I hope you can undelete.

14 A Because of the way I use it, the feelings are not in  
15 line. I can reinstall. Why? Didn't get it.

16 Q And then can you just look at the bottom, April 19th,  
17 11:48 p.m., Keith Raniere:

18 What happened with first batch of women?

19 A I didn't pursue, so they probably forgot about me.

20 Q Have you pursued anyone?

21 A I've chatted with a few girls, I've gotten a couple of  
22 numbers.

23 Q Skipping to the next page, April 20, 1:52 p.m., Keith  
24 Raniere:

25 Today, as soon as possible, write me this committed

Rees - direct - Hajjar

3552

1 life vow in paragraph form and swear it with your sacred  
2 honor, for better or for worse, forever, please, including  
3 compete honesty, obedience, surrender, et cetera.

4 I'm going to turn to page 63, April 25, 12:26 a.m.,  
5 Keith Raniere:

6 The wound is so deep and essential. Have you  
7 finished vow, letter, plan, in that order?

8 A Not yet.

9 Q The vow can uplift us and me.

10 A Was the vow I sent insufficient?

11 Q Have you finished any? Worked on them?

12 A Haven't finished them.

13 Q And then turning to the next page, 12:31 a.m., Keith  
14 Raniere -- this is in response to what did I miss, by Camilla:

15 Specifically giving yourself totally, control,  
16 ownership, body, emotions, life, et cetera, forever, as much  
17 as you can imagine to say. If you come up with things beyond  
18 what I have contemplated, I would feel even better. Go all  
19 the way, make it everything, like no other human in history  
20 has given themselves as completely to another. Make our love  
21 that important.

22 A I vow to forever be yours in heart and spirit and for as  
23 long as the physical world will allow in body. I vow to have  
24 your back in battle and in peace. I vow to always let you in  
25 and treat you as a friend. I vow to only speak your name if

Rees - direct - Hajjar

3553

1 I'm speaking of love.

2 What else do you want? This includes everything.

3 Q I vow to be yours and for you to have me and do with me  
4 as you would. I will obey you and trust you absolutely and  
5 irrevocably. I vow to have you as my master in all things and  
6 in all ways?

7 A You're pushing too much.

8 Q The problem is there shouldn't be a too much and you  
9 should be pushing me. Maybe this just can't work. Maybe is  
10 needed at this point is a total surrender of everything,  
11 joyfully, with no pride. If you feel I could even push too  
12 much, I should shut this door. Today has been the hardest  
13 night of my life. You value our love by what you give. Can I  
14 really push too much? Even if you give me everything it is  
15 not enough, but I accept it because it is all you have, I can  
16 take no less. It is not right. So show me?

17 A I vow to be yours and for you to have me and do with me  
18 as you would. I will obey you and trust you absolutely and  
19 irrevocably. I vow to have you as my master in all things and  
20 in all ways.

21 Q Do you understand why you do this and do it out of love?  
22 I love you, but in or for me to accept this vow because I  
23 cannot trust you, I need extreme collateral to be used if the  
24 vow is broken. This need to be large enough so the vow will  
25 never be broken and different types of punishment for



Rees - direct - Hajjar

3554

1 counter/bad behaviors. Through this you can repair and earn  
2 the love you destroyed, build self-esteem and become  
3 self-reliant and humble. This type of reward/punishment  
4 creates a self-esteem building system similar to what boys go  
5 through if they reach manhood. Come up with these things.  
6 Punishment levels: One, used frequently for minor infractions  
7 or suboptimum behavior. Two, used infrequently for true  
8 infractions. Three, even less frequent used for bad  
9 infractions. Four, extreme for very bad behavior. Five, the  
10 ultimate short of taking collateral, hopefully never used but  
11 an important reality. The world is full of these.

12 (Continued on following page.)

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Rees - direct - Hajjar

3555

1 EXAMINATION CONTINUES

2 BY MS. HAJJAR:

3 Q I'm turning to page 66, at the top.

4 Can you read the portion starting at 5:15 p.m.?

5 A Why did you leave this time?

6 Q Your lowless. You do not have state control, which means  
7 you have little self-awareness. Is this what you offer me as  
8 inducement to accept your vow?

9 I am going to skip ahead to 7:52 p.m. at the bottom.

10 Okay, when are you back? Will you complete the vow  
11 and related things, the letter and the plan? Will you be  
12 great for me and give me the you I deserve. Home?

13 I'm sorry, I don't trust you. You should have been  
14 eager to see me. You haven't contacted me, so I am concerned  
15 you are not home and with others. I tried calling.

16 A I know.

17 Q You know what? Are you home?

18 A That you called and that you don't trust me.

19 Q I am going to skip to the following page, April 26th,  
20 3:47 p.m. [sic].

21 Can you read Camila's text, please?

22 A What now? Just take the vow.

23 Q In order for me to speak to you ever again, I need to  
24 video all of our conversations at will. I experience you as  
25 childish, defiant, disrespectful and hateful. I experience

Rees - direct - Hajjar

3556

1 you use many strategies of blame at out of causedness in a  
2 very mean way towards me. It must stop from your heart. This  
3 is the only way because you are not nice to me and I can no  
4 longer trust you. I need an answer now or there are no more  
5 options.

6 And so, Agent Rees, you testified that interspersed  
7 with the references to the vow and to Camila's commitment,  
8 there are discussions of R?

9 A That's correct.

10 Q Can you describe the nature of the conversations about R?

11 A Obsessive.

12 Q Okay. I am turning to the next page, page 68 of 308-R.  
13 It's April 28th, 4:34 p.m.

14 Keith Raniere: Why haven't you insisted on  
15 swallowing me since you did so with R? I can't keep calling  
16 you. I want you to force yourself to stay connected.

17 A I haven't wanted it. I've been intimate with you without  
18 pushing me away. That's big.

19 Q That's the worst news of all. His sperm and DNA should  
20 be disgusting and invasive. You should have want to do  
21 anything to love mine, to try to save what is left of a  
22 connection.

23 Do you like his fluid more than mine?

24 A Right now, neither.

25 Q Did you ever prefer his taste, et cetera, over mine?

Rees - direct - Hajjar

3557

1 A Why do you want me to answer that?

2 Q Please don't question me like this anymore. I can't tell  
3 you the reasons. Please answer.

4 A If I didn't, I wouldn't have chosen to be with him.

5 Q You chose to be with him because you liked the taste of  
6 his semen better? ? ???

7 A No.

8 Q Then what do you mean?

9 A But if I disliked it, I would have avoided it.

10 Q I asked specifically about taste. Did you specifically  
11 mention to him you liked it??

12 A I can't remember.

13 Q I need you to.

14 A Probably.

15 Q What did you like?

16 A Seriously? I'm hesitant to share this with you.

17 Q I need everything. This is explicitly in the letter I  
18 wrote. For me to do anything more with you I need to know you  
19 want to tell me all.

20 And then at the top of page 69, the same exhibit.

21 A Does that mean you accepted the vow?

22 Q No. You keep giving me reasons not to. I keep telling  
23 you want I need that is different. Did you like his taste  
24 better than mine?

25 A I wish I didn't have to answer this. Yes.

Rees - direct - Hajjar

3558

1 Q The wish thing hurts us. What did you like better?

2 A Taste, consistency, quantity, intensity.

3 Q What about each of these things?

4 A Taste; he is mild and sweet. Consistency; not too  
5 concentrated. Quantity; small amount. Intensity; strong  
6 release speed.

7 I am sorry you had to hear that.

8 Q He is shorter and thinner penis-wise?

9 A Longer, but thinner.

10 Q Is he longer when I'm fully hard?

11 A Probably about same.

12 Q Did he hit the back of you?

13 A Question mark.

14 Q Last spring?

15 A Oh, I can't remember.

16 Q I am examining perception. I know his penis is 6.75  
17 fully erect and mine is 7.5, so I am looking at how you are  
18 slanting things.

19 A What the fuck? How do you know that?

20 Q Likewise with intensity. You forget our passionate times  
21 and compare our day-to-day and in the last year I've been  
22 heartbroken and could barely function.

23 A Why does this matter?

24 Q Maybe some day I'll tell you, but guys know these things  
25 about each other.

Rees - direct - Hajjar

3559

1 A How?

2 Q Later.

3 A I thought men did share these things.

4 Q How are you going to fix this? Men masturbate together.

5 A No way. Have you masturbated with him?

6 Q They don't share about their women, but themselves is  
7 different.

8 A Have you seen his penis?

9 Q His is definitely not the width or length of mine. How  
10 are you going to fix this lie?

11 A You haven't been at your fullest in a long time. It  
12 isn't a lie.

13 Q That is the problem. Your whole memory of him is a lie.  
14 The time before last I was easily longer than him. I kept  
15 hitting the back of you, remember? You came twice.

16 A How can I forget? But you were hitting the tender spots  
17 on the sides. I never come because you hit the back. That  
18 has never been the case.

19 Q It is highly doubtful he was even close to as sweet. I  
20 actually have a very strong basis for that. Mild maybe...  
21 Less volume definitely, but you put less volume as a plus. It  
22 is always a minus because I can put the rest elsewhere.

23 No, most people don't come because of the back, I  
24 was just pointing out I was 7.5 that morning.

25 A To be honest, this isn't that important to me. You're

Rees - direct - Hajjar

3560

1 bigger and better in every way, I'm sure of it.

2 Q I don't believe you're sure of it, but the taste has a  
3 special significance. All of these things can be altered:  
4 Length, width, intensity, taste, even to some degree volume.  
5 But there is an important factor in taste that is essential  
6 and that you have increased that sex so much and still protect  
7 the lie.

8 I can challenge the lie on measurables, but not the  
9 measurables that you must do. This is mostly measurable  
10 because if the lie you created real passion -- because of the  
11 lie you created real passion, because of real passion you  
12 grossly exaggerated the experience.

13 How are you going to fix that? The "and" after  
14 essential can be deleted and a new sentence started?

15 ??

16 A I don't care who's better or bigger. You do. Take it,  
17 hon. And yes, I am sure that you are superior.

18 Q What do you mean, take it?

19 A The crown. The official title. I will attest to that.

20 Q Agent Rees, is this only one example of the type of  
21 conversation about R that you've reviewed in these messages?

22 A Yes, it is.

23 Q Now, after April 26th and after messages relating to the  
24 vow, is there some discussion in the messages of an injury  
25 that Camila sustained?

Rees - direct - Hajjar

3561

1 A Yes, there are.

2 Q And I am turning to page 71 of Government Exhibit 308-R.  
3 At the top: How does the injury feel?

4 And then: I examined it. I wish you would allow  
5 Nancy to examine it. You cut completely through the dermis.  
6 Ideally could use treatment.

7 Have you reviewed images from the vicibaby account  
8 that reflects injury?

9 A Yes, I have.

10 Q And around this time?

11 A Yes.

12 Q I am going to skip to Government Exhibit 1779.

13 Is this another e-mail from Camila to Camila  
14 attaching a text file called "WhatsApp Chat with Unknown  
15 Caller"?

16 A Correct.

17 Q And I am going to ask you to read the portion on page 2,  
18 starting April 27th, 2015 at 9:20 a.m.

19 A Can we work something out? I value everything you have  
20 created and provide. I don't ever want to hurt you or your  
21 creation. I can see why you wouldn't want me around with  
22 something like last night. I will seek professional help. I  
23 will also commit to working on my deeper anger with the tech.

24 Can you please not send me back to Mexico?

25 My dream was to do something to help change the way



Rees - direct - Hajjar

3562

1 we educate children. If I am no good there and have nothing  
2 to contribute, then I will step down. Please don't send me  
3 back to Mexico. I will leave Rainbow completely if that's  
4 what you think is best.

5 I don't want to be in Mexico, my family and loved  
6 ones are here. I appreciate the community you have created  
7 and the values they represent. Please.

8 Q And at the end the page there is another. Can you read  
9 from 5:22 p.m., the same exhibit?

10 A It is a proposal because I am putting up some and  
11 compromising some. But I am asking for some, too. That's why  
12 I hesitate. If I were delivering everything you have ever  
13 asked for, I wouldn't call it a proposal. I do think you'll  
14 like it, though.

15 Q On April 27th, 2015, 5:32 p.m.

16 Keith Ranieri: Okay. I'm not sure of the time yet.  
17 What are you asking for in the proposal?

18 A To not go to Mexico.

19 Q Okay, we'll talk.

20 Then turning to page 46 of the same exhibit.

21 May 23rd, 2015 , 11:12 p.m.

22 Keith Ranieri: To have a life committed love  
23 relationship, and to suffer a mutual adversity that destroys  
24 that commitment in 90 days or less makes a life commitment not  
25 very permanent or valuable. It makes such a commitment, built

Rees - direct - Hajjar

3563

1 over 8.5 years not really important. We make our commitments  
2 important by how we handle them.

3 Then turning to page 82 of the same exhibit. Can  
4 you read from the highlighted portion, please?

5 A June 10th, 2015, 10:23 a.m.: Re the collateral. I  
6 discussed with Dani making it that I would leave Rainbow and  
7 could not have any further interactions with the kids.

8 Q Does this include a hundred percent loyalty, commitment  
9 and obedience forever?

10 A Yes. Do you want/need a letter of resignation drawn up  
11 for the collateral?

12 Q If you would, I love you to type these things also in vow  
13 form.

14 A What does that mean?

15 Q Whatever you want. Give me everything, your heart, your  
16 body, your mind, your soul.

17 Are there a lot, just because there are some  
18 excerpts, but have you reviewed many messages in this time  
19 period relating to collateral or the vow?

20 A Yes, I have.

21 Q Okay. And so, July 8th, 2015, 9:13 a.m.

22 Keith Raniere: Finish the vow.

23 A Question mark. I thought I had already taken the vow.

24 Q Yes. Finish it formally with collateral.

25 And then the same page, 9:16 a.m.

Rees - direct - Hajjar

3564

1           Keith Raniere: Do I get to put a permanent ankle  
2 bracelet on you or something? I'm sorry to ask this, did R  
3 poke the opening of your vagina with his penis?

4           Then below that July 30, 2015, 5:49 p.m.: When  
5 shall we do the collateral and formalize the vow?

6 A       Whenever you want.

7 Q       Can you resend me copy of the vow?

8           Then turning to August 3rd, 2015, 11:40 p.m.

9           Can you read the highlighted portion?

10 A       By the way, can we go over collateral? And I wanted to  
11 know if you consider the vow official or if there is anything  
12 else you need from me.

13 Q       And can you read that last excerpt, please?

14 A       August -- I believe that says 6, sorry, it's a little  
15 fuzzy, 2015, 2:08 a.m.

16           I would love to have a collateral all set. Wanna  
17 peek? Would love your thoughts.

18 Q       Yes.

19 A       When would you like it, hon? I have three already, but  
20 they are not very meaty, but the essence is there. I could  
21 use some feedback to best phrase it.

22 Q       Turning to page 179, can you just read the first portion  
23 that's highlighted, the first three messages?

24 A       August 7th, 2015 at 7:46 p.m.: I didn't say walking with  
25 our baby because I don't know that you would still want to

Rees - direct - Hajjar

3565

1 have kids with me now that I damaged my purity... but it is  
2 another fantasy. I can see why my mom or just people would  
3 choose to get lost in mysticism. It makes things less  
4 painful. It gives painful things: Events, mistakes, losses,  
5 meaning. It feels like it wasn't in vein. I am at a loss for  
6 words at the moment, but I am here thinking of you.

7 Q And the rest of these exchange and messages, and the ones  
8 on the following page, are these more messages relating  
9 details of Robbie, of R, and his relationship with Camila?

10 A That's correct.

11 Q Turning to page 189, August 12th, 2015, 6:16 p.m.

12 Keith Ranieri: I was very moved by your collateral.  
13 I'm still thinking about it. Your.

14 A It just needs to be signed, witnessed and notarized and  
15 then we can consummate our vows (well, my vow to you.)

16 Q At around this time period and a little bit before, Agent  
17 Rees, have you reviewed e-mails from this vicibaby@gmail.com  
18 e-mail relating to what's being described as Camila's  
19 collateral?

20 A Yes, I have.

21 Q So turning to Government Exhibit 1767, this is from  
22 vicibaby@gmail.com. When is it sent?

23 A It does not appear that it was sent.

24 Q The sent, the date?

25 A Oh, I'm sorry. July 22nd, 2015.

Rees - direct - Hajjar

3566

1 Q And can you read the text of this e-mail, please?

2 A To whom it may concern:

3 I hereby resign my position with Rainbow Cultural  
4 Garden as a multicultural development specialist and any other  
5 position or responsibility I may hold.

6 I hereby accept that I, Camila, will not and may not  
7 hold any position with Rainbow in the future and relinquish  
8 any privileges I benefit from, including relationships with  
9 children and families involved in Rainbow, monetary gain, et  
10 cetera. Any money owed to me by RCG immediately goes to Keith  
11 Ranieri or any person, company of his choice.

12 Camila. July 22nd, 2015.

13 Q And turning to the next exhibit, Government  
14 Exhibit 1776 -- 5, I'm sorry.

15 Is this from vicibaby@gmail.com sent August or sent  
16 August 9th, 2015 at 11:12 p.m.?

17 A That's correct.

18 Q Can you read the text of this e-mail, please?

19 A August 8th, 2015. Camila. Multicultural development  
20 specialist Rainbow Cultural Garden.

21 Dear Ms. Loreta Garza Davila:

22 I regret to inform you that I will be leaving  
23 Rainbow Cultural Garden effective immediately. Due to  
24 personal issues, I am no longer able to fulfill the  
25 responsibilities of my role and I feel it is in the best

Rees - direct - Hajjar

3567

1 interest of the company that I vacate the position. Due to  
2 these issues, I do not consider it safe for me to be around  
3 the children under my care. From this moment on I am  
4 withdrawing myself permanently from any current relationships  
5 with the children or the families under my care and guidance.  
6 I do hope that my leaving will not cause you or Rainbow  
7 Cultural Garden any convenience.

8 Best, Camila.

9 Q And turning to following exhibit, Government  
10 Exhibit 1776, an e-mail vicibaby@gmail.com dated August 10th,  
11 2015, and the subject line is Breach of Vow.

12 Can you read the text under the header Breach of  
13 Vow?

14 A On July 2015, I, Camila, took a vow of love, loyalty and  
15 obedience with Keith A. Raniere. The following are the terms  
16 of a breach:

17 I, Camila, on this 8th day of August 2015, being of  
18 sound mental health and possessed of full mental capacity,  
19 hereby declare this document and all its contents and  
20 provisions to be my terms and consequences for any breach in  
21 my vow. I declare the sole executor of these terms and  
22 consequences to be Daniela Padilla, whose relationship to me  
23 is that of mentor. I authorize this execution --

24 THE COURT: Executor.

25 THE WITNESS: Sorry.

Rees - direct - Hajjar

3568

1 A -- executor, upon the event of my breach of vow to manage  
2 all of my finances, accounts, properties and assets of every  
3 nature to fulfill the terms.

4 I hereby empower the executor to:

5 1. I will resign my employment as MDS at Rainbow  
6 Cultural Garden. I hereby authorize the delivery of the  
7 enclosed letter of resignation.

8 2. I authorize that the executor will deliver the  
9 enclosed letter addressed to Gaelyn M. Keith.

10 3. Claim any and all property that belongs to me,  
11 including all clothing items, two computers, one hard drive,  
12 treadmill, bike, passport, e-mail accounts.

13 4. Repossess of any items present and future that  
14 would sum of the total value of 1 million US dollars. This  
15 may include items belonging to me, Camila, or any future  
16 earnings, inheritance, real estate or items considered of  
17 value.

18 I. Camila, hereby declare this to be my true and  
19 complete terms and consequences, signed in the presence of  
20 three witnesses, and notary public listed beneath my  
21 signature.

22 Q And there are lines for witnesses present that are not  
23 filled out at the bottom of this e-mail?

24 A That's correct.

25 Q Okay. So turning to Government Exhibit 1777 dated

Rees - direct - Hajjar

3569

1 August 18th, 2015, subject: Collateral Family.

2 And can you read just the first part of this e-mail?

3 A Collateral Family. In case of breach of vow, I, Camila,  
4 hereby authorize the executor of all enclosed documents,  
5 Daniela Padilla, to copy-paste, the following text onto  
6 Facebook or through e-mail to family members.

7 Q Agent Rees, I am not going to ask you to read the portion  
8 in Spanish, but there is a line there:

9 *Mi Papa Hector es gay*, is that right, in the quoted  
10 Spanish portion?

11 A That's correct.

12 Q And then there are Facebook account information, e-mail  
13 account information, which include Camila -- a redacted  
14 portion -- at@yahoo.com and vicibaby@gmail.com, which is the  
15 account from which this e-mail comes. Is that right?

16 A That's correct.

17 Q Now, turning to page 285 of Government Exhibit 1779.  
18 October 1st, 2015, 9:19 p.m.

19 Keith Ranieri: I think it would be good for you to  
20 own a fuck toy slave for me that you could groom and use as a  
21 tool to pleasure me.

22 A Huh? Not disagreeing, just don't understand.

23 Q But you're my wife. She isn't. Just a tool for you to  
24 use for me.

25 A A person?



Rees - direct - Hajjar

3570

1 Q Get a slave, you're her master.

2 A Hmmm, do you really want that?

3 Q Do you not?

4 A I'm not as turned on by owning.

5 Q Then I'll own.

6 A I don't know. What if you like her more than me?

7 Q Will never happen. That insecurity is why I suggested  
8 her being your slave.

9 A Okay, okay, okay, maybe I can get behind that.

10 Q Maybe I'll command you. Emoticon.

11 I need to go. Text later my dearest little fuck toy  
12 slave?

13 A Yes, my love.

14 Q Sometimes you might call me "Master" when you are being  
15 my slave.

16 Turn to page 304 of the same exhibit. Can you read  
17 the highlighted portion starting at 8:27 p.m.?

18 A Does Nicki have a slave collar.

19 Q Honey, I love you, but are you going to ask different  
20 people who are also slaves? Whatever I answer I feel I lose.

21 A I have her right next to me and it looks like she has  
22 one. That's all. And you said you took her on, so when you  
23 answer whatever I answer, I lose, I take it as you saying yes.

24 Q If you knew how I loved you, you would not care even if  
25 it were true.

Rees - direct - Hajjar

3571

1 A I am not happy, and even less happy that you deflect.

2 Q I am extremely saddened that you are in any way unhappy.  
3 It cuts at the root of everything for me. Calling what I am  
4 saying about process a deflection is further disturbing  
5 because it seems like you don't understand principle.

6 A I don't understand your answers. That you won't give me  
7 a simple yes or no answer to me says that you have something  
8 to hide. Why wouldn't you just answer? That's one.

9 Q So you don't understand principle. Why didn't the women  
10 in The Contender just answer that it wasn't her?

11 A Two is that you would suggest I get one when she already  
12 has one. The fact that this exists now makes me question  
13 everything else you have said. It just be ours, just with me.

14 Q Hasn't it occurred to you I have nothing to hide because  
15 I own you?

16 A Just as you own many others.

17 Q You really need to change this attitude. This is very  
18 bad.

19 I am turning to the page, the next page, page 305 of  
20 the same exhibit. Can you read the highlighted portion  
21 starting at 9:06 p.m.?

22 A I feel extremely betrayed. I feel insignificant,  
23 worthless and disposable to you. I am wondering what else  
24 have you not told me.

25 Q Your pride is over the top. Unless you can somehow make

Rees - direct - Hajjar

3572

1 me believe you get it and are truly sorry, this is very bad.  
2 If you are humble, you can't be betrayed by me. Only ugly  
3 pride does that.

4 A I wish you were here right now. The fact that you don't  
5 give me answers hurts a lot.

6 Q Do you need me to continue to blame so you might break  
7 your pride?

8 Turning to page 312 in this exhibit, starting at  
9 October 9th, 2015, 10:18 a.m.

10 Keith Ranieri: You need to tell me how to access it  
11 again. Also, would you accept a brand?

12 A What does that mean? A brand? Like a cow? Branded like  
13 cattle? I thought that's what you meant last night and that's  
14 why I brought up tattoos.

15 Q Using heat, creating a mark more permanent than a tattoo,  
16 I think the branding of humans preceded that of cattle.

17 A You want to burn me?

18 Q You don't want to burn for me? A good friend had a brand  
19 from his fraternity.

20 A I am going to burn in hell for you, but I didn't think  
21 you would want to burn me. I'll do it if you want. I don't  
22 understand your resistance towards tattoos, though.

23 Q Not the point. I don't want to burn you.

24 A I prefer tattoos, honestly, they are more defined and I  
25 like them more aesthetically.

Rees - direct - Hajjar

3573

1 Q This is different. You will have tattoos for other  
2 things, branding is more unique and possessive.

3 A I am not against it, but it is not my favorite choice.

4 Q Turning to the next page, page 313 at the top.

5 Keith Raniere: I understand. I don't think you  
6 understand it. If you did, I believe you'd really want it.

7 Then at 12:13 p.m.

8 Without going into detail, it caused there to be  
9 other slaves. All who want to be branded with my monogram,  
10 plus a number. Your number is reserved. It is number one.  
11 It is now a secret growing organization. I don't know well  
12 some of the people involved, but I command them ultimately.  
13 They are not who you might think. I think there are ten or  
14 more in the current Jness track and others outside of it.

15 A Does that mean that they know about each other?

16 Q No.

17 A You said the main ones do to a degree. Do what? Do know  
18 about us?

19 Q Yes, and know you are number one.

20 A What? I thought no one knew.

21 Q No one knew which thing?

22 A About us.

23 Q You are still not telling me your thoughts or feelings.

24 A Who knows about us?

25 Q Before I tell you more, I want to know what you are

Rees - direct - Hajjar

3574

1 thinking and feeling and that you still love me just as much.

2 A There is a lot I don't understand. I like uniqueness,  
3 one-of-a-kind-ness. I do love you just as much.

4 Q Two through seven know you are one.

5 A I'm okay with you having other slaves. I assume that  
6 these are not sexual.

7 Q They may or may not be. They would be if I commanded,  
8 but that is not the reason for the organization.

9 A I would like to be the one that knows your body.

10 Q It is an absolutely trusted commitment.

11 A I want to be the one that worships your body.

12 Q Many will not even know of my existence. Some don't  
13 already.

14 A Also, although I vowed servitude and I get great pleasure  
15 from serving you, I always imagined us being a partnership.  
16 You know, us against the world.

17 Q Yes. Still possible, but know there are others I trust.  
18 I had to, or else I would have had to send you to a psych ward  
19 in Mexico... Now.

20 A I don't get that.

21 Q I can explain sometime, but in the USA attempting suicide  
22 can lead to murder charges if you succeed in the future.  
23 There are also some ethical issues that are very difficult.

24 Agent Rees, are there other references in the  
25 WhatsApp chats you reviewed about going to Mexico or being

Rees - direct - Hajjar

3575

1 back in Mexico?

2 A Yes.

3 Q December 1st, 2015 at 5:11 p.m.

4 Keith Ranieri: You may want to understand how much  
5 I support you and this community, so you can not be entitled.  
6 If I had died and you went back -- you would have been back in  
7 Mexico in less than a year.

8 And this is out Government Exhibit 1779 on page 587.

9 Can you read the next excerpt?

10 A April 27th, 2015, 12:05 p.m.: My dream was to do  
11 something to help change the way we educate children. If I'm  
12 not good there and have nothing to contribute, then I will  
13 step down. Please don't send me back to Mexico.

14 Q And turning to page 320 of the same exhibit,  
15 October 10th, 2015, 1:43 p.m.

16 Keith Ranieri: Find a life slave and I will tell  
17 you everything.

18 A What do you mean by life slave?

19 Q Someone who has a collateralized vow with you for life.

20

21 (Continuing on the following page.)

22

23

24

25

Rees - direct - Hajjar - WhatsApp chats

3576

1 (Continuing)

2 MS. HAJJAR: And turning to page 127.

3 Q Can you read the highlighted portion?

4 A October 11th, 2015, 7:48 p.m.

5 I am yours. I will brand, pierce, tattoo, freeze,  
6 cut my body if it helps.

7 Q Do all the things I mentioned intensely. Think of things  
8 to do even more. Think of things to please me.

9 A I wrote them down. I am on it.

10 MS. HAJJAR: And then turning to the next page 338  
11 the same Exhibit.

12 Q Can you read the highlighted portions starting from the  
13 top?

14 A October 13th, 2015, 9:46 p.m.

15 Ha ha. Oh, man, I am so curious.

16 Q About what?

17 A Your slaves. Their identities and level.

18 Q Well, apart from you, there are six first line. Not Pam,  
19 Monkey, Karen, Dawn, Lauren, Nancy, Rebecca and many others  
20 you might suspect. The front line forms a group that are all  
21 devoted to each other and me?

22 MS. HAJJAR: Then at 10:00 p.m. the same page.

23 Q Keith Raniere: What are your thoughts? Feelings? All  
24 of them have slaves in process. Some have several completed.

25 A I feel insecure but at the same time I feel proud of you.

1 You are worthy of a following like that.

2 Q So are you. You're number one.

3 A I would be proud to stand next to you.

4 Q Even naked with six other committed naked women?

5 MS. HAJJAR: Turning to page 343 of the same

6 Exhibit.

7 Q Can you read from the top, please?

8 A October 14th, 2015, 3:38 p.m.

9 THE JUROR: These three monitors went out.

10 THE COURT: The monitors blocked out?

11 Let's take a brief recess and bring in the IT people  
12 to take a look at the monitors.

13 All rise for the jury.

14 THE COURTROOM DEPUTY: All rise.

15 (Jury exits.)

16 (In open court; outside the presence of the jury.)

17 THE COURT: You may stand down, we will take a brief  
18 recess.

19 (Witness steps down.)

20 THE COURT: All right, we will take five minutes.

21 (Recess taken.) (In open court.)

22 (Judge NICHOLAS G. GARAUFGIS enters the courtroom.)

23 THE COURTROOM DEPUTY: All rise.

24 THE COURT: Let's bring in the witness, please.

25 (Witness resumes stand.)



Proceedings

3578

1 THE COURT: About how much more do you have?

2 MS. HAJJAR: Your Honor, it may go slightly into  
3 tomorrow morning, I have enough in the direct examination to  
4 last to the end of the day.

5 THE COURT: Well, it is what it is.

6 MR. AGNIFILO: I don't think the cross tomorrow will  
7 be too long.

8 THE COURT: Okay.

9 MS. PENZA: Your Honor, we were trying to, as the  
10 day -- take each day, days where we think that it may be  
11 appropriate to go a little longer. We wanted to raise it with  
12 the Court because we know there had been contemplation of  
13 whether we could go long on certain days.

14 I think tomorrow, given that there will be a number  
15 of witnesses, I think that it would be a day where we could go  
16 an additional hour.

17 THE COURT: Go an additional hour?

18 MS. PENZA: Yes, if the Court and the jury --

19 THE COURT: With the jury? I will check. I will  
20 check if the jury can go -- you are saying until 6:00?

21 MS. PENZA: Yes, Your Honor, or 5:30, Your Honor.  
22 Whatever the Court wishes.

23 THE COURT: Let me see if I can work out 5:30 as a  
24 possibility.

25 MS. PENZA: Thank you, Your Honor.

Rees - direct - Hajjar - WhatsApp Chats 3579

1 THE COURT: In an effort to move the trial along, in  
2 that context it might be possible to do that.

3 MS. PENZA: Okay, otherwise...

4 THE COURT: It will be what it is.

5 MS. PENZA: Understood. Thank you, Your Honor.

6 THE COURT: Let's bring in the jury.

7 (Jury enters.)

8 THE COURT: Please, be seated.

9 Let's continue.

10 I remind the witness she is still under oath.

11 THE WITNESS: Yes, Your Honor.

12 BY MS. HAJJAR:

13 MS. HAJJAR: I'm directing you to page 343 of  
14 Government's Exhibit 1779.

15 Q Can you please read the highlighted portion starting from  
16 the top?

17 A October 14th, 2015. 3:38 p.m.

18 How much can I share with Allison? She's asking  
19 about our relationship. I think I'm going to throw up or  
20 faint. Can I text Berta? I still feel like I want to throw  
21 up. There is much I don't know and understand. The children  
22 thing breaks my heart more than I ever thought possible. I  
23 wanted a life with you. I wanted my purity and devotion and  
24 your love and beauty to create beautiful children to inhabit  
25 the world. It feels like death. I feel like I'm going to

Rees - direct - Hajjar - WhatsApp Chats

3580

1 break. Allison called the slave thing like sister-wives and I  
2 don't know if that -- I don't know if that it what it is or  
3 what you want it to be. I'm also struggling with the fact  
4 that I've paid my dues. I also owe --

5 MS. HAJJAR: Turning to the next page at the top,  
6 it's a continuation.

7 A -- because of what I did. For ten years, and they are  
8 just coming in, and at least Allison assumes she is the same  
9 as me and we are all the same.

10 Q Can you continue reading the two messages that follow.

11 A I'm sorry, the?

12 Q The messages that follow.

13 A In blue?

14 Q They're not highlighted but can you read them.

15 A I'm sorry.

16 That bothered me. She has no clue. She is fresh  
17 and excited because she just came in. I don't think it is  
18 right to level that to ten years of our life together.

19 Q Please heal this. Both paths are different and can't be  
20 compared. A restarted broken path of ten years is not  
21 comparable to a new path.

22 A What do you mean? What specifically are you referring to  
23 when you say heal this?

24 Q I just threw up blood for 15 minutes. I want my sweet  
25 love loving happy Cami back.

Rees - direct - Hajjar - WhatsApp Chats

3581

1 A By the way, what do the numbers mean? She knew her  
2 number. Do they all know their number? I need to sit. I  
3 feel like I'm going to throw up. I thought I'd stand next to  
4 you as number one. I thought I'd be your partner and I was  
5 even thinking of ways of helping them feel special and  
6 included.

7 MS. HAJJAR: Turning to the next page, 345, the same  
8 Exhibit.

9 Q At the top, can you read the highlighted portion.

10 A Can it still be our home with our kids and our love?  
11 I'll give my arm for it.

12 Q Yes. But you need to find slaves quickly that are good.

13 A Are these slaves for you? Or for us?

14 Q There are two types. Both types are for us. One type is  
15 in the program. You are their master, I am their Grandmaster.  
16 The other type are very select ones you use to heal us, likely  
17 being also of the first type.

18 A Okay. I am asking because these persons will be in our  
19 life forever but I was not involved in the process of choosing  
20 who.

21 Q Agent Rees, can you continue reading, even though it is  
22 not highlighted, below that?

23 A I am afraid I will not be comfortable with the others.

24 Q You choose your slaves.

25 A What about the seven? Allison said these seven were

Rees - direct - Hajjar - WhatsApp Chats

3582

1 forever. She and others will be forever in my life.

2 Q They are first to me, first line to me but if any suit  
3 the purpose, I obviously have access.

4 A But I did not pick them. Yeah, but what if I don't want  
5 one of the seven forever in my life?

6 Q The circumstance will need to evolve. It should be that  
7 way if you're devoted and love me. That they have committed  
8 should give them respect and care from you also, as well as  
9 the other way around.

10 A But you didn't ask. You have stuck me with seven women  
11 for life and didn't ask. I'm afraid Nicky will be part of it.  
12 I would never pick Nicky or Monica.

13 Q Can you continue reading, Agent Rees, straight through.

14 A I would pick someone like Melissa. Or Pam. Or Marisa.  
15 I feel like I'm drowning.

16 Q Marisa who?

17 A Jness from Monterrey. I feel like I'm going to be sick.  
18 The way it was presented and the way it actually is, is very  
19 different. I am struggling. I am holding onto your love. I  
20 haven't stopped shaking. I want to hold you and for you to  
21 hold me.

22 Q It feels worse than that because of how you're  
23 experiencing this. I am truly heartbroken at the deepest  
24 level. I would hope you would eagerly embrace everyone I  
25 might choose, in part, because you know, I choose by virtue.

Rees - direct - Hajjar - WhatsApp Chats

3583

1 Even if I chose a female Hitler.

2 A Media omitted.

3 I feel like you are rejecting me all again. I  
4 should have kept things to myself.

5 Q Agent Rees, can you continue reading the portion in  
6 between the highlighted portions?

7 A No. No. No, no. No rejection. If anything, I'm  
8 holding onto you. This is just not what I thought. I really  
9 thought it would take away from us but all the time you spend  
10 with them you choose not to spend with me. It hurts. Did you  
11 like female Hitler?

12 Q It won't at all if you embrace it without reservation.  
13 This is what a good slave would do.

14 A I want to be good for you. I wanted to be good enough to  
15 be your wife. Good enough to be wanted.

16 Q And just continue reading.

17 Considering what I've endured over the past year  
18 plus, doesn't that demonstrate anything to you?

19 A Yes, my honey, it really does. I'm just sharing how it  
20 feels. I know you love me. Honey, please tell me you didn't  
21 pick Nicky or Monica. You know I've always had issues with  
22 them. Also, when you mention the slaves, I thought you were  
23 putting me as number one meant something. At today I feel  
24 like I was downgraded. I'm just struggling, that's all. It  
25 was a lot at once, give me time. I feel like my identity was

Rees - direct - Hajjar - WhatsApp Chats

3584

1 blended in with the others. I'm just sharing feelings, not  
2 making accusations. I love you. I'm mourning the loss of you  
3 and me against the world. I'd give anything to have that  
4 back. You and me against the world. That was special.

5 Q It could be. But after tonight I feel disheartened.  
6 Instead of joyfully accepting everything I do and have done,  
7 you're not. How can it be you and me against the world if  
8 that's true?

9 A No, my sweetheart, I am accepting. I am just scared  
10 shitless. I am so sorry. I'm not rejecting it or you.

11 Q The thing you would have to give up is all your negative  
12 pride and love me enough to be fearless.

13 MS. HAJJAR: I am going to turn to the next page.

14 Q October 15th, 2015, at 12:51 p.m. Read the highlighted  
15 portion.

16 A Do you have any tips for me? I want to be the best.

17 Q Unfortunately, the most intense stimulation requires two  
18 or three mouths. But as a single mouth, you're fantastic.

19 A Okay. I need to warm up to the idea of two to three  
20 mouths, but if that were the case, could I be the one to drink  
21 you?

22 Q Absolutely. That's what those fuck toys are for.

23 A Oh, goody. Honey, can I tell you something?

24 Q Yes.

25 A I feel like I'm in a competition now, like I have to

Rees - direct - Hajjar - WhatsApp Chats

3585

1 defend whatever I have left. I feel like I got a lot taken  
2 away from me yesterday.

3 Q Not true.

4 A I believe you, I'm just sharing how I feel.

5 Q But your needing to defend could be transformed into  
6 positive motivation.

7 A I thought we were still going to have a family. Gone. I  
8 thought I was the only one. Gone. Yeah, I am using it to be  
9 better, but it is not nice to feel like they are going to  
10 steal everything from you at any moment. I was excited about  
11 the slaves because they would understand the specialness of us  
12 and help protect it. I discovered the opposite yesterday.

13 MS. HAJJAR: All right, I'm turning to page 360 on  
14 October 17th, 2015, at 3:07 p.m.

15 Q Keith Ranieri: Which slaves? The general ones or our  
16 more personal ones?

17 MS. HAJJAR: At 3:11 p.m.

18 Q The more personal ones allow you to stimulate my body so  
19 it can grow stronger faster. Multiple slaves allow you to  
20 never be worn. Also can do things to make me come more than  
21 you. Also, the multiple pheromones of a highly-stimulated  
22 biochemical effect by preventing habituation.

23 A Oh, I meant the six. You are talking about the slaves I  
24 will get, right?

25 Q The six can help me move the world because I'm not strong



Rees - direct - Hajjar - WhatsApp Chats

3586

1 enough now to push with the other vehicles I've created. They  
2 can also be absolutely trusted and will not fight me no matter  
3 what. I have always done things democratically but there is  
4 not time.

5 A Ah, okay.

6 Q Yes to your question.

7 A I may ask for help in finding a successor and slaves. My  
8 methods are not getting me anywhere. Any suggestions on who I  
9 could ask?

10 Q Dani or Rosalara.

11 MS. HAJJAR: And turning to page 366 of the same  
12 Exhibit.

13 Q Can you read starting from the top.

14 A October 18th, 2015, 3:10 p.m.

15 I think Dani just accidentally revealed two other  
16 slaves.

17 Q Who?

18 A Nicky and Monica.

19 MS. HAJJAR: And turning to the next page, 367.

20 A 4:02 p.m.

21 I know you said the slaves were to move the world  
22 because you didn't have the strength. Did you get them also  
23 to have children? Just so you know, it stings, but it doesn't  
24 affect my love or commitment to you.

25 Q No, I don't need slaves to have as many children as I

Rees - direct - Hajjar - WhatsApp Chats

3587

1 would want.

2 A What does that mean?

3 Q I won't be able to respond on the road. I do not need to  
4 have slaves. There are many women who would have my children.

5 A I know.

6 Q I can probably name 20 or more. Slaves aren't needed for  
7 that.

8 MS. HAJJAR: Turning to page 391, October 23rd, 2015  
9 at 5:37 a.m.

10 Q Keith Ranieri: Honey I need to go, some of these sound  
11 like they may be good prospects. What do they think of me?

12 A They admire you. Idolize you. I don't know sexually.  
13 They might not have even considered it because of your  
14 position, but I'm sure they think you are hot.

15 MS. HAJJAR: And turning to the following page 392,  
16 October 23rd, 2015 at 5:46 a.m..

17 Q Keith Ranieri: What if you suggested they seduce someone  
18 (me) with you?

19 A Ooh. Like a game?

20 Q Don't tell them it's me. Just see if they're open. Or  
21 truth or dare.

22 A Okay, okay. Okay. I like all these ideas. Let me see  
23 how I can make them real. I'll think about it.

24 MS. HAJJAR: And turning to page 399, the same  
25 Exhibit, October 25th, 2015, 2:00 a.m.

Rees - direct - Hajjar - WhatsApp Chats

3588

1 Q Keith Ranieri: There are potential successors but they  
2 are so young. This creates several problems. Will I live  
3 long enough? Will they stay pure? Will they connect so  
4 deeply with me being so much older? Will I have the strength  
5 to put in the years once connected? Even if all that works,  
6 will any be viable? If so, will they remain true?

7 A How can I increase your chances of success?

8 Q Maybe working with them.

9 A Anything, my love.

10 Q It's sad. Isabella was possible when I had you start  
11 looking.

12 A Are there any more like her?

13 Q She's older and could have started much sooner. One but  
14 she's very unlikely.

15 A Because of age?

16 Q No, personality and energy.

17 A Fabiola's daughter?

18 Q She's a potential but might not be pure for long. Norma.

19 A She is?

20 Q Norma is pure.

21 A What's the problem with her energy?

22 Q Not sure if it's terminal. I'll see. She's mine.

23 A ? What do you mean?

24 Q She doesn't know. She doesn't know that I am her  
25 Grandmaster.

Rees - direct - Hajjar - WhatsApp Chats

3589

1 MS. HAJJAR: And then turning to 2:13 a.m.

2 A Please tell me there is something I can do to be your  
3 successor. Please.

4 Q And then at 2:16 a.m.

5 Keith Ranieri: The other candidates so far are all  
6 13 or so. So many years to wait even to start. That last  
7 text was not the answer to your question. I have always  
8 protected you and made things better behind the scenes. I can  
9 keep you at your current purity level but I can't restore what  
10 was lost.

11 MS. HAJJAR: Turning to page 401, October 25th,  
12 2015. 2:25 a.m.

13 Q Keith Ranieri: I want you to be my successor.

14 A Please let me be your successor. I don't know who to  
15 consult. I want to find a way to be your successor.

16 Q You would have to do all this and find a path. I don't  
17 know if one exists except I know I need a pure vessel  
18 involved. We can have our love, but purity, both  
19 energy-related and DNA-wise, is compromised.

20 A No.

21 Q No?

22 A I will fix it.

23 Q I want that. Find a pure vessel for us.

24 A I want to be your vessel.

25 MS. HAJJAR: Then page 419, October 27th, 2015,

Rees - direct - Hajjar - WhatsApp Chats

3590

1 1:47 a.m.

2 Q Keith Ranieri: You can. By finding the other and  
3 keeping her for me.

4 A I am looking for her. I am very sorry.

5 Q She needs to be very pure. More than being just a  
6 virgin. At least as pure as you were when I first met you.

7 A What do you mean more than just a virgin? How?

8 Q No oral sex. No semen. Ideally, no penis at all.

9 MS. HAJJAR: And turning to page 485. November 8th,  
10 2015, 1:41 p.m.

11 Q Keith Ranieri: Honey, I may not have other children.

12 A My womb is yours.

13 Q I may not be worthy. My lineage may not stay.

14 A What can I do?

15 Q Fix. Successor. Slaves. Even more quickly.

16 MS. HAJJAR: And at 2:44 p.m. on the same page.

17 Q Keith Ranieri: As of now I have not been worthy to do  
18 what I do, be as I am and have a pure woman stay devoted to  
19 me. As of now I have no successor. This means my teachings  
20 will not last as anything in their own right and will be  
21 absorbed into other things, which also means the genetic  
22 advantages I possess are not worthy and will go away, which  
23 means there will be strong forces for me not to have many  
24 children. If my lineage does not withstand competition, my  
25 unique genetic combo will not be able to either. It will not

Rees - direct - Hajjar - WhatsApp Chats

3591

1 be a basis of other generations. It will be absorbed and  
2 combined with others until a superior combination comes about.

3 MS. HAJJAR: Then turning to page 509, can you.

4 Q Can you read the highlighted portion.

5 A November 13th, 2015, 12:23 p.m.

6 Projects for the slaves. I don't understand how the  
7 slaves play into it.

8 Q Yes. Projects scene is yours that you created by  
9 bringing in these people. You create value with new people.  
10 That earns my time.

11 MS. HAJJAR: Turning to page 534, November 18th,  
12 2015, 1:47 p.m.

13 Q Keith Ranieri: Maybe Rosalara can assist. How many  
14 candidates do you have? How are they with you?

15 A They are super-nice to me and look up to me in a way.

16 Q Any of them pure enough or just slave?

17 A Just slave.

18 Q How do you feel about being friends with young future  
19 candidates and shepherding them over time?

20 THE JUROR: Excuse me, the screens. The screens  
21 they went out.

22 THE COURT: They are out again?

23 THE JUROR: This is working, that one works. These  
24 three are out.

25 And mine.

Rees - direct - Hajjar - WhatsApp Chats

3592

1 Four.

2 (Pause in the proceedings.)

3 THE COURT: It will be just a moment.

4 (Pause in the proceedings.)

5 THE COURT: While we are waiting.

6 Members of the Jury, I don't know if Mr. Reccoppa  
7 mentioned it to you, that we might want to go a little later  
8 than 5:00 o'clock on several days so that we can move the  
9 trial along, but discuss it among yourselves and if there are  
10 days that are better than others, tomorrow and possibly next  
11 week, let us know if you can accommodate us with going until  
12 perhaps 5:30 instead of 5:00 o'clock. Anything you can do  
13 will help us all to move the case along, but I think you  
14 should consider that and discuss among yourselves. Let  
15 Mr. Reccoppa know if you are able to make some adjustment, all  
16 right?

17 THE JURY: Yes.

18 (Pause in the proceedings.)

19 THE JURY: They're good.

20 THE COURT: They're on again? Why don't you just  
21 stay right there.

22 IT: Yes, Your Honor.

23 THE COURT: All right, let's continue then, thank  
24 you.

25 Q All right, Agent Rees, starting 1:47 p.m.

Rees - direct - Hajjar - WhatsApp Chats 3593

1 Keith Raniere: Maybe Rosalara can assist. How many  
2 candidates to you have --

3 MS. HAJJAR: I'm sorry, we went through this  
4 already. We'll skip to the next page.

5 Turning to 539, same Exhibit, at the top.

6 Q Can you read from the top highlighted portion.

7 A November 19th, 2015, 12:14 p.m.

8 I'm trying to think of someone who would be a good  
9 support but no one around here is a good candidate. I think  
10 I'll go online.

11 Q Please don't go online.

12 A Then?

13 Q How about Laureis?

14 A No.

15 Q Why?

16 A I am secretly hurt that for years you said you would help  
17 me get through this and now you are abandoning me. I feel  
18 unloved and misunderstood.

19 Q Look at the pride in the message for the last. You are  
20 being prideful and self-centered. I almost died last night,  
21 felt worse life-force-wise than I have in my life. You are  
22 worried about you and somehow, which is what you did to betray  
23 me, making it I rejected you. This really changes my hopes  
24 with you. I can't trust you.

25 MS. HAJJAR: Turning to page 599. December 3rd,



Rees - direct - Hajjar - WhatsApp Chats

3594

1 2015, 10:37 p.m.

2 Q Keith Ranieri: Three of the four candidates are so young  
3 in many ways. It will take years until they mature and then I  
4 will be even older and weaker. Doubtful I will be much of a  
5 candidate for them.

6 A You would be, honey. Any of those girls would be lucky  
7 to have you.

8 MS. HAJJAR: Turning to page 608. December 5th,  
9 2015.

10 Q Can you read at the top, please.

11 A 6:40 p.m. I'm waiting out the lesbians. How are your  
12 meetings, love?

13

14 (Continued on following page.)

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar

3595

1 DIRECT EXAMINATION (Continuing)

2 BY MS. HAJJAR:

3 Q Lesbians can be turned to the dark side, especially if  
4 they are slaves.

5 And, Agent Rees, I'm going to ask you to read the  
6 non-highlighted portion between these two segments.

7 A To the dark side. Ha, ha. They tend to be arrogant or  
8 stubborn. That's the only problem.

9 Q As slaves, pride can be broken, arrogance thereby  
10 removed.

11 Page 649, can you read at the top, at the  
12 highlighted portion?

13 A December 20, 2015, 3:16 p.m.:

14 I heard back from three of the candidates. Does  
15 that help?

16 Q I wish the cure could move much faster, but it can only  
17 go so fast. I wish things could move faster with you, but  
18 you're only capable of so much.

19 And then, turning to Government Exhibit 310-R, is  
20 this another e-mail Camilla to Camilla, August 6, 2016,  
21 attaching a WhatsApp chat with an unknown caller?

22 A That's correct.

23 Q And turning to page 417 of this exhibit, October 26,  
24 2015, at 1:29 p.m.:

25 The few lineage in the world -- lineages in the

Rees - direct - Hajjar

3596

1 world are set up on a type of evolutionary basis, survival of  
2 the fittest. There are no remedies if you're not the fittest.  
3 If my existence is not worthy, no healer can fix that.  
4 Survival of the fittest doesn't work if the participants can  
5 be fixed. The best hope is someone pure, qualified and  
6 devoted.

7 A Emoticon.

8 Q I don't know if I'm even strong enough anymore to build  
9 that energy. Once R destroyed that in you, I was greatly  
10 limited and not as strong. It would take great strength for  
11 me to build that again over years.

12 A But you said I could help you. It is very painful, but I  
13 am willing to help you replace me.

14 Q Yes. But I don't know if enough of anything can reverse  
15 the extinction of my lineage. If anyone can help, it's you.  
16 But I wish there were a guarantee.

17 A What kind of guarantee do you need?

18 Q It's not what I need, I just don't know of any definite  
19 way to avoid what is happening.

20 A What can I do? What do you need from me?

21 Q For example, even if the perfect pure successor felt  
22 deeply enough for me to start today, I don't know if I have  
23 the energy to put in for the next three to five years to build  
24 her body to where yours was.

25 A Emoticon. Hurts.

Rees - direct - Hajjar

3597

1 Q Three to five years is minimum. More like ten. When the  
2 thing with R happened, so much was lost.

3 A I am very sorry.

4 Q You were so perfect. It's so hard.

5 Turning to page 419, can you read from the top,  
6 please?

7 A October 26, 2015, 8:27 p.m.:

8 Hi, my honey. I forgot that you might not reply  
9 that much. I have been searching for candidates for a  
10 successor on the site. It is called [experienceproject.com](http://experienceproject.com) and  
11 it connects people based on explicitly listed common values  
12 and experiences. My profile is carefully crafted by someone  
13 with a personality that you might be looking for and a virgin,  
14 of course. I can show you, if you want, so you can add or  
15 remove anything you feel would help. I have messaged a few  
16 women, but I haven't heard back. I also wanted to see if I  
17 can find out if Chelsea has friends that might be like her, if  
18 it is a thing or if her losing her V card so late was a fluke.

19 Q Has to be hard. Apparently Chelsea has a younger sister,  
20 14, but that's years away and her family would take it hard.

21 And turning to page 446 of 310-R, November 1, 2015,  
22 4:13 p.m., Keith Raniere:

23 I don't know if I can give any other potential  
24 successor the quantity or quality of life force I gave to you  
25 to build you. I feel like it is climbing Mount Everest again.

Rees - direct - Hajjar

3598

1 Even if I started now, it's years and years, even if I were  
2 strong and motivated. Now it is from pain, not positivism.

3 A What can I do? Can I reclaim my position? I'll do  
4 anything.

5 Q I don't know. Keep pushing and more fully understand  
6 what was lost.

7 A I will, honey.

8 Q I was amazed how your body would pull the energy out of  
9 me. It would seem like it searched every corner out of my  
10 body and pulled every last bit. Each encounter was so  
11 amazing.

12 A Is it not anymore? Is that what you want the new  
13 successor to do? How are you feeling?

14 Q No texts. I just heard your father is now concerned  
15 about where you live. We need to be very careful, Fluffy or  
16 others might try to follow you.

17 Page 447, the top, November 1, 2015, 6:18 p.m.:

18 Too much to text what was lost, how perfect it was  
19 in so many ways, what it means to not find a successor and  
20 almost just as bad to find one.

21 A Oh, then we are paining over the same thing. I thought  
22 you said there was a way I could still be it. Did you change  
23 your mind?

24 Q There has to be a pure element. I have to take her and  
25 build her for that. For you, I don't think I have the

Rees - direct - Hajjar

3599

1 capacity. I gave it completely and fully to you.

2 A I wish the movies and stories were right. It is a lie  
3 that love conquers all. It doesn't. It doesn't matter how  
4 much we love each other. You will still replace me. I could  
5 have left. I hope the fact that I chose you and will rebuild  
6 our love with every breath would mean something, would  
7 probably make us stronger.

8 Q No. You replaced me no matter how much I loved.

9 A November 1, 2015, 6:45 p.m.:

10 I don't feel strong today. I feel very insecure. I  
11 feel like I have nothing to offer. I feel worthless. We  
12 never had much content to share except me healing you and  
13 being pure. So now I have no loyalty or purity to offer, so I  
14 don't think you would want to be with me. I don't know what I  
15 have to offer.

16 Q After all I've done, you realize that's insulting.

17 A I am sorry. I am just expressing. I don't mean to  
18 insult you. I'm not talking about reality. I'm talking about  
19 how I feel. It has more do with what I have done than with  
20 you.

21 Q Then page 452, November 2, 2015, 5:38 p.m.

22 Can you read the highlighted portion?

23 A Transcript. Still looking for successors out there,  
24 thought more of slaves. I will plan a trip to New York City  
25 before Thanksgiving and visit all my candidates.

Rees - direct - Hajjar

3600

1                   What do you think? Can I text Janie?

2   Q    Why are the candidates in New York City?

3   A    Why are they there? That's where they live right now.

4   Q    All?

5   A    Yes. All my current candidates, yes.

6   Q    Any reason why or just statistics?

7   A    Just statistics. I'm open to any location, but this is  
8 what I found for now.

9   Q    Be careful it's not a trap. If you have only texted, you  
10 don't know who's on the other end.

11   A    Question.

12   Q    Question mark.

13   A    I'm talking about Narina, Marianna, Elizabeth, they are  
14 all lesbians.

15   Q    Okay. I thought you had found possible online candidates  
16 also.

17   A    I'm still looking. I am finding ways.

18   Q    And turning to page 464, can you read the highlighted  
19 portion at the top?

20   A    November 3, 2015, 3:59 p.m.

21                   I wish you didn't. I wish you could recognize the  
22 pain that I feel now and was not willing to feel during the  
23 year is all the difference. The fact that I want to be with  
24 you, even though I know I'll never get the family I've always  
25 wanted, I would have liked for you to see that and know that

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3601

1 you are more important to me, that I choose you over  
2 everything, I've always thought would make me happy. I would  
3 hope you can see that it means something that I chose a life  
4 of despair for you. I went to the bathroom. I wish you'd  
5 recognized that I could have walked away, but I chose to stay.  
6 I walked away many, many times during the year. I finally  
7 chose to stay, chose you. I wish you could see that.

8 Q I understand. Do you understand my doubt if R or Jim or  
9 someone else presents an opportunity I'm not sure of the  
10 outcome?

11 A No. I don't think you know the pain I feel.

12 Q You tried to commit suicide, still hadn't chose me, but  
13 you would've had to go to a psych ward in Mexico. So it was a  
14 choice between staying or that, not me.

15 A Not true. I really considered that option. I was not  
16 against it. What I didn't want was never speaking to you  
17 again.

18 Q Please don't take this wrong. It's not negative just  
19 expressing the pain I feel each time I want to believe the  
20 things you say. I won't be able to fully for a long time.

21 A You do know why I tried to kill myself, right?

22 Q Why?

23 A You said you are dead to me.

24 Q Yes, but even after that whole thing you didn't choose  
25 me.

MDL

RPR

CRR

CSR



Rees - direct - Hajjar

3602

1 A I'm not going to get through. Okay.

2 Q Turning to page 494, November 8, 2015, 5:17 p.m.

3 That night was the biggest shift of consciousness,  
4 that's why you were in a trance-like state. That's the thing  
5 that is hardest to get back.

6 A How could I get it back?

7 Q I don't know if it's possible now, but it needs another  
8 pure vessel that I prepare and that doesn't fail. I don't  
9 know if I have it in me to repair another. With that pure  
10 vessel, we might be if able to have it.

11 A Okay. I'm looking, love.

12 Q I'm running out of time and the potential ones are so  
13 young, it would take a rare one indeed to transcend social  
14 norms and relate with someone so much older that way  
15 permanently. Besides I'm a donkey, that really gets in the  
16 way.

17 And turning to page 529, 3:36 p.m.:

18 It will hurt me physically and set me back if I am  
19 intimate with you in the next two to three days because of B.  
20 My condition is very tenuous. It will also hurt me physically  
21 and set me back to not be intimate with you in the next two to  
22 three days. You would have had the capacity help me. I don't  
23 know which pain I should take or can bear.

24 A This is new information for me. You know that I am  
25 bulimic, right? This is every day and has been for years, but

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3603

1 now today, you make it -- you have to make this choice.

2 Something doesn't make sense here.

3 Q I feel you haven't been listening to me then.

4 A Oh, shit. I'm sorry. I might be too caught up in my  
5 panic. Okay, let me try again.

6 Q When was the last time you B before last night?

7 A Yesterday evening.

8 Q I told you B is bad for me and us, but the weight is  
9 worse. I also thought you got that. If you stop the B,  
10 without my having to ask, it was much better because of some R  
11 things. The other day was going to ask you to stop, but  
12 because it was better I didn't, you stopped me and said, in  
13 effect, you had it covered. I have been in need the past few  
14 weeks. I'm very critical now. You have ignored all of this  
15 it seems and continue to be.

16 A Yes, I have been trying and thought I could do it alone,  
17 but I am struggling. I'm very sorry, honey.

18 Q And turning to page 4, at 5:46, can you read the chat  
19 starting at the top, please?

20 A November 19, 2015, 3:24 p.m.:

21 I feel it. I know. You don't want to hear it, but  
22 I am sorry. I think I keep trying ways to get you to help me  
23 because I feel like I can't do it on my own. I feel hurt.

24 But I think whenever I feel hurt, it is pride. If I drop it,  
25 I just start crying because I'm afraid I will fail again and

Rees - direct - Hajjar

3604

1 you just will be upset again. I feel scared and alone and I  
2 feel blammie [sic] because you were supposed to hold my hand  
3 in this life. So I take this as my punishment for letting go  
4 of your hand once.

5 Q I told you I would help. I offered something, you  
6 refused and want to do it your way.

7 A I feel punished. I know I am not but I feel punished. I  
8 feel scared. I feel lost. I feel alone. Very alone.

9 Q It is childish to think in terms of punishment instead of  
10 cause and effect.

11 A And because you are not here, in this battle, I feel like  
12 you don't want to be here. You don't want me. You don't love  
13 me. I am unloved.

14 Q If you were humble and went over your past texts, it  
15 would help.

16 A I'm not trying to be logical or mature. I am baring my  
17 soul. I am telling you what's underneath when I drop the  
18 pride.

19 Q I am helping you. I'm showing you how to make it better.

20 A I tried rejecting the pride, but even that you wouldn't  
21 be with me for. I felt angry because I felt so scared. I  
22 have a lot of very scary feelings -- that I didn't know still  
23 existed -- come up. And I first pushed them down because I  
24 didn't know how to handle them. So how am I supposed to  
25 handle them now? I feel abandoned and that is very scary. I

Rees - direct - Hajjar

3605

1 don't want other people. I want you. I wanted support,  
2 encouragement, love and acceptance and I've gotten only  
3 criticism. I feel very shake [sic]. Very unstable. I wanted  
4 to feel safe in this process and I don't. I know it's not  
5 your fault. I just want to feel safe. I think that is why I  
6 choose pride because I feel so unsafe. I keep reaching out  
7 for the one constant in my life, the love in my life, and I  
8 keep getting rejected. That is super scary. I don't have  
9 bulimia as my coping mechanism anymore, so it's even scarier.  
10 I don't want to fail you. I am so scared.

11 Q And then, turning to page 632, can you read the  
12 highlighted portions please?

13 A December 11, 2015, 11:41:

14 Hi, honey. I am at this moment creating another  
15 profile to create more candidate options. I don't know if it  
16 is the profile I have now, or what, but I'm not getting a lot  
17 of responses. I've been thinking of a few things, honey,  
18 between slaves, successors, you raising a child with another  
19 woman, me being okay with it because it is bigger than me,  
20 time, your strength, collateral.

21 December 12, 2015, 1:04 a.m.:

22 I am sorry. I don't know why tonight is a painful  
23 night. I don't want to make it harder on you. I want to give  
24 you strength, help us grow, but it is a night of despair.  
25 Love you very much. I am working on building a strong profile

Rees - direct - Hajjar

3606

1 to create options for candidates, slaves. I'm looking for  
2 them to be in New York State, looking for meaning or a better  
3 life, unconventional maybe, introspective. Any suggestions?

4 Q And turning to page 670, can you read the highlighted  
5 portion at the top.

6 A December 25, 2015, 9:52 p.m.:

7 I am sad that we will be apart for the 28th and New  
8 Year's.

9 Q Why not showering?

10 A Because I shower for you. I just came home. I feel  
11 better when I am home. I feel closer to you. I feel safe  
12 here like I am in your arms.

13 Q The shower thing is hard because that first summer you  
14 showered for R and many people noticed, and haven't for me.

15 A Oh, my God, you are right. I will fix that. I had  
16 forgotten about that. It is true.

17 Q Is it the transcript? Tell me what you did and why.

18 A It is not in the transcript. It is not something I did  
19 with him or he ever mentioned or asked me to do.

20 Q Ideally, everyone needs to see you as better, healthier,  
21 prettier, cleaner, happier than you've ever been. The stuff  
22 for R needs to be disaffirmed, but you did it around or for  
23 him, noticeable by him and others. It is important.

24 A I understand. I'm not saying that it's not.

25 Q I know. I just want to know about it and telling you

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3607

1 such things should be in the transcript with the motivation  
2 behind them. I don't feel peaceful with today, your lack of  
3 texting and other things has me very sad and uneasy.

4 A The why is, when I was after his attention, I was going  
5 for careless and was in a way choosing a life of image. Right  
6 now, I feel like all of that is meaningless. I feel like why  
7 does it matter to look good, why put on the makeup, the hair.  
8 Why? What did I do? I feel like when I chose you, I chose a  
9 way from the life, from the looks, et cetera. I just feel  
10 like what's the point.

11 Q But you need to show your desire and are willing to do  
12 more for me in every way.

13 A Oh, honey, I'm sorry for the misunderstanding. I'm not  
14 unwilling to do for you. Quite the opposite.

15 Q Do you really want to have treated him with more care  
16 than you treat me?

17 A I am just becoming aware of these feelings. No. I wish  
18 we could Skype.

19 Q And do you want others to think you are better because of  
20 him?

21 A No. You know that, honey.

22 Q How do you show all those people you are better now than  
23 then? Materialistic, image-conscious people like your brother  
24 and sister.

25 Can you start -- this is on 12/26/15, 12:30 a.m.,

Rees - direct - Hajjar

3608

1 can you read from the top, please?

2 A I didn't do it for him. I felt alive. I felt like I  
3 wanted to go out and do stuff, develop skills, grow, move  
4 forward, go to life with friends, family, social life. I  
5 wanted was the main part. I felt driven to not stay locked in  
6 watching my life go by. I felt an urgency to live because I  
7 wouldn't get my twenties again. That's why I looked better to  
8 people. That's why I went out more, attended social events,  
9 parties, went out, et cetera.

10 Q So how can you outdo that for me and also break the  
11 association to him?

12 A I don't want to do that with you because it takes away  
13 from our time, because that is what you do when you still have  
14 hope and believe life is beautiful. I feel shame all the time  
15 and feel like no matter what I do, one, it can't be about me  
16 or for me; two, it doesn't change what I can't get back.  
17 Nothing I do will bring back our future lost. I feel  
18 hopeless. I feel like I only live for you. I feel like I  
19 should only live for you. I feel like my life is not mine in  
20 that way. I can't do as I please. I will do those things,  
21 though, to fix those associations. I don't want to leave it  
22 like that. This is why I wanted to Skype. When I read it  
23 back, it sounds very whiny and suffery [sic]. It's not meant  
24 that way, but it does carry pain. I want to be able to share  
25 these feelings without feeling like I just said something bad.

MDL

RPR

CRR

CSR

Rees - direct - Hajjar

3609

1 Q When you say I can't do as I please, it hurts deeply. I  
2 want you to understand.

3 A Why? It is true. It is wrongful, wouldn't you agree?  
4 For two reasons.

5 Q What two reasons? It might be true, but if you love me,  
6 it would be true -- wouldn't be true.

7 A One, for anyone to do as they please is inconsiderate of  
8 others and very damaging to anyone around them. Two, when I  
9 broke the window, I kind up gave up the right to do what I  
10 want with my life. Until it is repaired, I think I don't have  
11 the same freedom as if I didn't have a pending bill. Is this  
12 incorrect?

13 Q If you loved me, you would want to do anything else.

14 A I'm not sure I understand.

15 Q When one loves they automatically consider others, it  
16 would never be any other way. The greatest joy is to consider  
17 others.

18 I'm turning to the next page, 672. Can you continue  
19 reading?

20 A That's why I wanted to Skype. I feel like you are taking  
21 this as a complaint. I'm not complaining. If you look at the  
22 text, it starts with: I don't want to do that with you.

23 Q No, the assumptions under what you're saying really hurt.  
24 That you don't have hope or don't believe life is beautiful is  
25 the most disastrous thing you could say.



Rees - direct - Hajjar

3610

1 A Would you be open to considering that maybe that is not  
2 what I am saying? Or assuming? Because I just want you. I  
3 chose you and I don't want anyone else or do anything else.  
4 Please don't say that.

5 Q Look at the out of cause assumptions under what you  
6 texted.

7 Page 673, December 26, 2015, 12:49 a.m., Keith  
8 Raniere:

9 Feeling cheated is out of cause and not only your  
10 participation. I can't even open it on the computer yet.

11 A This was not something to do over text. This is too deep  
12 a wound for me. It should not have been open like this.

13 Q What's the wound? All out of causedness [sic] needs to  
14 be removed. You should feel no wounds other than the desire  
15 to fix and make right and love, no suffering whatsoever.

16 A Skype.

17 (Continued on following page.)

18

19

20

21

22

23

24

25

Rees - direct - Hajjar

3611

1 EXAMINATION CONTINUES

2 BY MS. HAJJAR:

3 Q Suffering here disrespects the damage you've caused in  
4 love. Can't.

5 A I can't do this over text.

6 Q Then turning to 679, December 27th, 2015, 4:46 p.m.

7 Can you read the highlighted portion?

8 A Why are you not feeling well, love?

9 Q Slowly but surely I'm wearing down. It's a combination  
10 of no successor, this new life, and other things.

11 A This new life?

12 Q Not what is, was going to be. New is not good in this  
13 case.

14 A Oh, you mean all the new women you have taken on?

15 Q No.

16 A Why can't we move it to what it was going to be?

17 Q Not having the life with you. I had really put all my  
18 eggs in that basket, so to speak.

19 A Am I doing something wrong?

20 Q Can -- I think that's your --

21 A Oh, I'm sorry.

22 Can we -- can we bring those eggs back? I will get  
23 you a successor.

24 Q No, but it would make a huge difference if things went  
25 much faster.

Rees - direct - Hajjar

3612

1 A I want the life with you.

2 Q I don't know if I have the will to build another.

3 A I will help you this time.

4 Q Have to start soon.

5 A Yes, I'll find one and help you.

6 Q There are the young ones, but there's quite a time before  
7 they can even start.

8 A I'll get you more options.

9 Q How many attractive, not socially defective virgins would  
10 give their life to someone like me at my age?

11 A Ummm, all of them? You are handsome, sexy, strong,  
12 gentle, loving, funny, talented, have a beautiful smile, eyes,  
13 loving touch. What woman wouldn't want that? You know for a  
14 fact that they all want you.

15 Q Even an inexperienced 18-year-old?

16 A Even an inexperienced 15-year-old.

17 Q Would need to be a once in a lifetime person, and I had  
18 that and lost it.

19 Can you read the next two messages, Agent Rees?

20 A Emoticon. I am sorry.

21 Q When I finally -- had finally found you, that was it for  
22 me.

23 A I am so stupid. I am so sorry.

24 Q This is page 680 from Government Exhibit 310-R.

25 Can you read the top of the highlighted portion,

Rees - direct - Hajjar

3613

1 please?

2 A December 27th, 2015, 5:52 p.m.: I imagine that you are  
3 doing all sorts of sexual stuff on a beautiful tropical  
4 setting. I have nothing to base this on, that's why I said  
5 crazy.

6 Q Although that shouldn't matter, it absolutely not so?

7 A I feel ashamed for feeling this way because I want to  
8 accept you, and I do, lovingly, no matter if you are having  
9 crazy sex with sexy bitches. Oh, you beat me to it. I want  
10 to accept you fully no matter what, but I just with and to  
11 share with you my crazy self.

12 Q Okay. News?

13 A I love you. I want to know about you, your adventures,  
14 what your eyes are seeing, what you're feeling. I miss you.  
15 I miss you so much.

16 Q Nothing yet. I've been dealing with difficult things and  
17 people. It is the 28th here. I'm so sad about us. I'm  
18 saddened you don't text as I would like and haven't told me  
19 more about the transcript, et cetera.

20 A I thought it might be the day there already. It is not  
21 here yet. I lurk.

22 Q I haven't experienced that program you spoke of to give  
23 me peace of mind.

24 A But I am sorry I don't text as much.

25 Q Why not?

Rees - direct - Hajjar

3614

1 A I tell you about everything I do. Whenever you don't  
2 hear from me, I am doing the last thing I told you about  
3 still. Like right now, I'm still with RJ since I told you  
4 about it last night.

5 Q That's what you said in the past.

6 A I have only ran, that's the only exciting thing I have  
7 done. I have been struggling with my emotions. It is very  
8 hard not talking to you. I am having a very rough time. I  
9 did not expect this when I thought of the program. I am  
10 having a rough time emotionally. I cry every day several  
11 times a day. I feel depressed. The only concern I can see  
12 that would be legitimate would be that I am going crazy and  
13 that I am not emotionally sound.

14 Q This is page 683 of the same exhibit, December 28th,  
15 2015, 1:17 a.m.

16 Keith Raniere: Make another successor. Give me you  
17 in ways you would never have.

18 A I thought that was because I didn't want him, that I was  
19 under his spell or trance. It could have been reversed. I  
20 didn't want him. I would never want him because he is not  
21 you. I thought that would make a difference.

22 Q His DNA touched you and went inside you and was  
23 assimilated. Also, he has memories of your interactions and  
24 you have memories. All of those things need to be eliminated.  
25 If that could be, then maybe I would have the connection that

Rees - direct - Hajjar

3615

1 was lost the very first time.

2 A How do I do that? I'll do anything. I'll eat shit.

3 I'll do anything.

4 Q I have told you, if you find another successor that is  
5 best for us, but time is running short.

6 A Oh, I thought were you saying that maybe I would have the  
7 connection that was lost, the very first time.

8 Q Turning to page 688, December 28th, 2015, 8:54 p.m.

9 Keith Ranieri: You joined Telegram and didn't tell  
10 me.

11 A I'm still trying to figure this phone out. I also have  
12 Facebook on my phone again, I think. Let me try you. I tried  
13 you on Telegram.

14 Q Agent Rees, this last message is in December '15. There  
15 are a few more messages in 2015, but the last page of  
16 Government Exhibit 310-R, page 689, have you reviewed messages  
17 that extend farther past this time period?

18 A I have not.

19 Q Do you know what Telegram is, what's mentioned here?

20 This is page 688 of Government Exhibit 310-R.

21 A I do.

22 Q What is it?

23 A It's a communications app with end-to-end encryption.

24 MS. HAJJAR: Maybe we can switch to the ELMO, Your  
25 Honor.

Rees - direct - Hajjar

3616

1 BY MS. HAJJAR:

2 Q Agent Rees, have you also reviewed e-mails obtained by  
3 search warrant for the e-mail address camilascastle@yahoo.com?

4 A Yes.

5 MS. HAJJAR: May I approach the witness, Your Honor?

6 THE COURT: Yes, you may.

7 Q I am going to show you what's been marked for  
8 identification as Government Exhibit 1400-4, 1400-6, 1400-23,  
9 1400-25, 1400-30, 1400-45, 1400-65, 1400-99, 1400-134,  
10 1400-151, 1400-197 and 1400-198.

11 MS. HAJJAR: May I approach the witness, Your Honor?

12 THE COURT: Yes, you may.

13 BY MS. HAJJAR:

14 Q Agent Rees, can you take a look at these?

15 A (Witness complies.) Yes.

16 Q Agent Rees, the exhibits you just reviewed, are these  
17 e-mails that were obtained from Yahoo for the e-mail address  
18 camilascastle@yahoo.com?

19 A Yes, they were.

20 Q And have you reviewed each of these exhibits?

21 A Yes, I have.

22 MS. HAJJAR: Your Honor, the Government offers these  
23 exhibits.

24 MR. AGNIFILO: No objection, Your Honor.

25 THE COURT: Alright, Exhibits 1400-4, 1400-6,

Rees - direct - Hajjar

3617

1 1400-23, 1400-25, 1400-30, 1400-45, 1400-65 -- or is it 55?

2 MS. HAJJAR: Yes, Your Honor.

3 MR. AGNIFILO: 65.

4 THE COURT: 65.

5 -- 1400-99, 1400-134, 1400-151, 1400-197, 1400-198

6 are received in evidence.

7 (Government's Exhibits 1400-4, 1400-6, 1400-23,  
8 1400-25, 1400-30, 1400-45, 1400-65, 1400-99, 1400-134,  
9 1400-151, 1400-197 and 1400-198 were received in evidence.)

10 MS. HAJJAR: Thank you, Your Honor.

11 BY MS. HAJJAR:

12 Q Agent Rees, I am going to show you what's in evidence as  
13 Government's Exhibit 1400-4.

14 (Exhibit published.)

15 Q Agent Rees, can you read who this e-mail is from?

16 A Sorry, I have a black screen.

17 A JUROR: They are all out.

18 THE COURT: I'm sorry?

19 THE WITNESS: The screens went out.

20 THE COURT: Yes, I'll do it.

21 A I'm sorry, can you repeat the question?

22 Q Who is this e-mail from?

23 A Camila Rodriguez at camilascastle@yahoo.com.

24 Q And who is it to?

25 A Camilascastle@yahoo.com.



Rees - direct - Hajjar

3618

1 Q And can you read the text of this e-mail?

2 A Hey, I went to cut my hair, but apparently I need your  
3 permission. I wouldn't do it right away since I can't afford  
4 it, but I'd like to know so I can start making plans. Let me  
5 know.

6 Q Now, I want to show you what's in evidence as Government  
7 Exhibit 1400-6.

8 (Exhibit published.)

9 BY MS. HAJJAR:

10 Q And the bottom e-mail, who is that e-mail from?

11 A From camilascastle@yahoo.com.

12 Q And to who?

13 A Camilascastle@yahoo.com.

14 Q And what was the date it was sent?

15 A Monday, February 23rd, 2009.

16 Q And can you read the text of this e-mail, please?

17 A Am I a liability to you? I sometimes get that impression  
18 from the way you treat me. And I hadn't really thought about  
19 it until now, which makes me think, there's not much I can do  
20 if you don't tell me. I guess I keep hoping that our  
21 relationship will be like a fairytale. So far, the facts have  
22 proven me wrong, except for our love, which is the best kind  
23 of love that I've ever experienced. Although it seems to be  
24 that not even love is enough for us to be together.

25 I imagine that there are many other women that could

Rees - direct - Hajjar

3619

1 say the same things that I'm saying. I'd like to know  
2 something from you. Does our relationship have potential to  
3 be unique and special? You know what I mean? Please. This  
4 is important to me. Me.

5 P.S. Not only have we not had sex this year, we  
6 have not had sex in three months. Yay, my lover won't touch  
7 me, I feel so wanted. Not funny, right?

8 Q What about the above e-mail, who is it from?

9 A It's from camilacastle@yahoo.com.

10 Q And who is it to? Is it the same e-mail address that is  
11 the recipient?

12 A That's correct.

13 Q And what's the date?

14 A Tuesday, February 24th, 2009.

15 Q And can you read the text of this e-mail?

16 A Before you cut the hair, lose the weight and I'll make it  
17 worth your while. I'm sorry about the other stuff. I will  
18 tell you about the potential of us face-to-face. I will also  
19 talk to you about the liability thing. As for the other,  
20 hmmm, yum, XXXXX.

21 Q Agent Rees, have you reviewed the camilacastle@yahoo.com  
22 e-mail account, many e-mails from that account?

23 A Yes.

24 Q And is it common in that account to have e-mails which  
25 appear to be sent to and from the same e-mail account?

Rees - direct - Hajjar

3620

1 A Yes, it does.

2 Q Do they appear to be addressing each other, the e-mails  
3 that are sent in succession?

4 A They do.

5 Q Okay. And the signatures associated with some of the  
6 e-mails that are sent, is it -- are they signed VC or Camila?

7 A Yes.

8 Q And the other responses that are responded to, does it  
9 appear to be some other user, other than Camila?

10 A It does.

11 Q And what is the date -- we've been -- for most of your  
12 testimony today, Agent Rees, you've been talking about  
13 communications from 2015 or thereabouts.

14 What's the date of these communications?

15 A 2009.

16 Q And I am going to show you what's in evidence as  
17 Government Exhibit 1400-23.

18 (Exhibit published.)

19 Q The bottom e-mail, again, is this camilascastle@yahoo.com  
20 to camilascastle@yahoo.com?

21 A Yes, it is.

22 Q What's the sent date?

23 A Wednesday, March 4th, 2009.

24 Q And can you read the text of this e-mail?

25 A Hello, my sweet lollipop. I really enjoyed your form

Rees - direct - Hajjar

3621

1 tonight. You never cease to amaze me. It seems as if the  
2 more I love you, the more I admire you and am curious to get  
3 to know you. I like what I see in you. You have a brilliant  
4 mind and I think you know it, yet you possess a certain  
5 humility that I think everyone should aspire to. I admire  
6 what you do in the world and the strength that you do it with.  
7 I think you are an inspiration to everyone. I admire you as a  
8 character and deeply love you as my lollipop.

9 Smiley face. Kisses, hugs and sniffles. VC.

10 Q And is there a response to this e-mail on the same day?

11 A They're --

12 Q Camilascastle@yahoo.com to camilascastle@yahoo.com?

13 A Yes.

14 Q And does the text of that e-mail -- it's: Re fan mail  
15 winky face. The text of the e-mail is: Lollipops love to be  
16 licked by very obedient slaves.

17 A Correct.

18 Q And, again, this is in 2009?

19 A Correct.

20 Q Showing you what's in evidence as Government  
21 Exhibit 1400-25. The bottom e-mail.

22 (Exhibit published.)

23 Q Again, is this camilascastle@yahoo.com to  
24 camilascastle@yahoo.com on March 5th, 2009?

25 A That's correct.

Rees - direct - Hajjar

3622

1 Q And can you read the text of this -- the text of this  
2 e-mail, please?

3 A I was sad to find out that you were screening my calls.  
4 I thought we were better than that. Lollipop, it is your  
5 loss. You are missing out on all the fun. I am losing weight  
6 and looking better every day, but you wouldn't know because  
7 you don't even pick up the phone for me. Raspberry. Whatev.  
8 Anyway, I had some pretty cool stuff to tell you, but I guess  
9 you'll never find out. Wa-ha-ha, wa-ha-ha-ha, that's my evil  
10 laugh by the way. Be well.

11 Q And is there a responsive e-mail the following day from  
12 camilascastle@yahoo.com to camilascastle@yahoo.com?

13 A Yes.

14 Q And can you read the responsive e-mail?

15 A Honey, I do not screen your calls unless, one, I am on an  
16 expensive conference call; two, other people are right there  
17 in a very problematic way. Please, please, please understand.

18 Besides, you have to tell me your pretty cool stuff  
19 anyway if you are a good slave. The great day thing should  
20 probably be changed. If you sign your e-mail with a X0, then  
21 there is a message.

22 I've been thinking about some very creative  
23 torturous -- well, I guess you will just have to be a good  
24 girl and find out.

25 Q Showing you what's in evidence as Government

Rees - direct - Hajjar

3623

1 Exhibit 1400-30. At the bottom camilascastle@yahoo.com.

2 Can you read the text of that e-mail?

3 (Exhibit published.)

4 A Hee, hee, hee, today I found out that people think I'm  
5 still a virgin. Wa-ha-ha, wa-ha-ha.

6 Q And is there a responsive e-mail the next day, March 8th,  
7 2009, again the same e-mail account being used to send and  
8 receive the e-mail?

9 A Yes.

10 Q Yum, I have so much experience for you?

11 A Correct.

12 Q Now I am showing you what's in evidence as Government's  
13 Exhibit 1400-45.

14 (Exhibit published.)

15 BY MS. HAJJAR:

16 Q So does this appear to be an e-mail with various  
17 forwards?

18 A Yes, it does.

19 Q What's the -- what's the e-mail at the bottom?

20 A The first e-mail is an e-mail from KeithRaniere@yahoo.com  
21 to Marianna, themightyrunner@gmail.com.

22 Q And is there a URL at the bottom?

23 A There is.

24 Q Sleepy dog is the subject of the e-mail?

25 A Correct.

Rees - direct - Hajjar

3624

1 Q And can you describe -- this appears to be a forward in  
2 the second e-mail.

3 Can you describe from who it is and to whom and  
4 when?

5 A It appears the original e-mail was then forwarded from  
6 Marianna, themightyrunner@gmail.com to Daniela,  
7 thegreathead@gmail.com; Camila@yahoo.com,  
8 Adrianflofito@gmail.com; Adriana, theinnerwitch@gmail.com,  
9 Hector, Hector@gmail.com.

10 Q What is the date that that e-mail was sent?

11 A March 18th, 2009.

12 Q And then is there a third forward e-mail?

13 A Yes.

14 Q Who sent it and to whom?

15 A It was a forwarded e-mail from Camila@yahoo.com to  
16 camilascastle@yahoo.com.

17 Q And what date?

18 A March 19th, 2009.

19 Q And can you read the text of this e-mail?

20 A Seriously? It would take her nothing to erase the text  
21 that says that this is originally from you. I question her  
22 intention, especially because it pisses me off. Ha-ha. I'm  
23 getting really unhappy about this. What are you not telling  
24 me? You are going beyond keeping her happy. Are you lying to  
25 me?

Rees - direct - Hajjar

3625

1 Q I am showing you what's in evidence as Government's  
2 Exhibit 1400-65.

3 (Exhibit published.)

4 BY MS. HAJJAR:

5 Q Now, the bottom e-mail, it's an e-mail from  
6 camilascastle@yahoo.com to camilascastle@yahoo.com on  
7 June 20th, 2009?

8 A That's correct.

9 Q And can you read the text of this e-mail?

10 A Hi, love. I just wanted to drop by to tell you that you  
11 have my full support in whatever you are doing. I say  
12 whatever because you don't always tell me what it is that you  
13 do for people, and I just have a feeling that it is a lot.

14 I'm very grateful for everything you've done for me.  
15 I want to return the favor by taking the burden that you  
16 carry, but most of the time I end up feeling incompetent and  
17 end up not helping at all. You deserve the best and I will  
18 try to give you just that.

19 I feel like I should keep you informed with what's  
20 going on in VC land. There are days that I'm feeling very  
21 lovey, gooey; and then there are days when I just feel like  
22 picking a fight or having something to complain about for no  
23 good reason. I think that part is clear most of the time. I  
24 am trying to figure out what to do with this. I know that you  
25 are not up for this. My mental notes don't help me get out of

SAM

OCR

RMR

CRR

RPR



Rees - direct - Hajjar

3626

1 this state. They just remind me that it is not about you. So  
2 I need to do some thinking and figuring out, but I just wanted  
3 to bring you up to speed.

4           Want to get in a fight with me? I'm totally fine  
5 with you winning and I promise I won't complain if you end up  
6 pinning me to the floor or the wall; hee-hee. I think I'm  
7 going to try to save these feelings, cravings -- yes, they are  
8 the same thing -- for some other occasion, if you know what I  
9 mean, wink face. Or maybe I just need a good spanking, I  
10 don't know. What you think, Master? What does this good old  
11 VC mean? Okay, I'm getting way too into it. Let's move on.

12           I want to help you get healthy again. Today, and  
13 always, on the VC menu we offer walks, healthy juice,  
14 delicious pussy, lovely conversations full of XXX topics. I  
15 strongly suggest the pussy. It is light on the beaver and  
16 fresh out of jailbait grounds. Hopefully, you will have  
17 something nice to think about for the next hours and maybe  
18 days. Enjoy. Love, Slavey Slave.

19 Q    This e-mail was sent on June 20th, 2009. Is there a  
20 responsive e-mail on the same day?

21 A    Yes, that's correct.

22 Q    What does the responsive e-mail say?

23 A    Yum. Thank you. I love you and your... against...  
24 the pinned to the...

25 Q    I am showing you what's in evidence as Government

Rees - direct - Hajjar

3627

1 Exhibit 1400-99.

2 (Exhibit published.)

3 BY MS. HAJJAR:

4 Q Just again, this is an e-mail signed C, March 20th, 2010.

5 If you could just read the first few paragraphs of this bottom  
6 e-mail, please.

7 A Hey, hon, I've been thinking about us a lot. I prefer to  
8 talk to you in person, but I have no idea when you are going  
9 to call next and how long you are going to be able to stay on  
10 the phone.

11 I've grown a little concerned about us. Your  
12 inconsistency would be alright, but now it is making me  
13 uncertain of all the things you've told me, and only me. See,  
14 the other day I watched a movie where a woman was accused of  
15 harassing a man that she claimed to be her lover. All the  
16 proof that she had could not be confirmed because everything  
17 she had was from conversations they'd had. I am afraid that  
18 one day I'll find out that I am this woman. I have nothing to  
19 show for this relationship, no proof, except what you have  
20 told me.

21 But now I feel it would be irresponsible to not see  
22 the reality. What I see as undeniable is the fact that you  
23 don't maintain communication. Sometimes we go about a month  
24 without seeing each other, and you don't mind. You don't show  
25 for the days that I consider to, show for that, I consider to

SAM

OCR

RMR

CRR

RPR

Rees - direct - Hajjar

3628

1 count and other things that probably already know of. I want  
2 to re-evaluate this relationship. I am starting to feel like  
3 it is not healthy. Everything is on your terms. This doesn't  
4 feel like a partnership anymore. I don't feel like I have a  
5 lot to say, and I'd like for it to be a partnership, a strong  
6 team.

7 Prove me wrong or just tell me for sure that I am  
8 right. At least things would make sense.

9

10 (Continued on the following page.)

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar - WhatsApp chats

3629

1 (Continuing)

2 Q And is there a responsive e-mail at the top?

3 You're very incorrect and sad face?

4 A That's correct.

5 MS. HAJJAR: All right. I'm showing you what's in  
6 evidence as Government's Exhibit 1400-134.

7 (Exhibit published to jury.)

8 Q Again, the bottom e-mail CamilasCastle@yahoo.com to  
9 CamilasCastle@yahoo.com.

10 Can you read the text of this e-mail?

11 A I am hoping for a little more communication, if possible.  
12 It bothers me that you treat other acquaintances better or  
13 more personally than me. Just a thought.

14 Q And is there a responsive e-mail on the next day? This  
15 is August 29th, 2010?

16 A Yes, there is.

17 Q Can you read that e-mail back, please?

18 A I am under surveillance and parabolic microphone pick up  
19 everything whispered to me. Can you get a walkie-talkie and  
20 use extension 96. Opposite of? I will likely have some time  
21 today. Love.

22 MS. HAJJAR: Showing you what's in evidence as  
23 Government's Exhibit 1400-151.

24 Q Starting from the bottom, is this an e-mail from  
25 CamilasCastle@yahoo.com to CamilasCastle@yahoo.com on

Rees - direct - Hajjar - WhatsApp chats

3630

1 December 19th, 2010 with the text: How come you never write  
2 me?

3 A Yes, it is.

4 Q And what is the responsive e-mail on November 18th, 2010?

5 A Just checking to see if my sunshine wrote. I know you're  
6 locked up. Only wish I were the one doing the restraining.  
7 With rope. Or whatever. Yum.

8 Q Okay. Is there another e-mail back the same day?

9 Oh, I didn't know I was your sunshine as well?

10 A That's correct.

11 Q And the last e-mail, again, the same account.

12 Can you read the text?

13 A Hi honey, today is likely to be a very difficult day for  
14 it appears there are increased efforts to destroy my image,  
15 et cetera. I was just thinking of you as an oasis. Love and  
16 gadgets.

17 Q Okay.

18 MS. HAJJAR: And then showing you what's in evidence  
19 as Government's Exhibit 1400-197.

20 (Exhibit published.)

21 Q The bottom e-mail, March 1st, 2011, 2:31 a.m. Can you  
22 read the text of this e-mail?

23 A Hey. Sorry that there are so many new messages in the  
24 inbox. I just can't seem to be able to reach you. I am  
25 feeling a little desperate and frustrated. Time seems to go

Rees - direct - Hajjar - WhatsApp chats 3631

1 by and I just feel very stuck here. I want to be able to move  
2 around. Oh, and speaking of stuff, it has become really hard  
3 for me to lose weight. I ran eight miles the other day and I  
4 didn't seem to lose much. I am becoming really frustrated and  
5 anxious because I know you want me to lose weight and be  
6 super-thin. Especially for this thing coming up. Ah. I'm  
7 sorry, I'm just feeling very hungry, fat and like a failure.  
8 I am so hungry. I feel like I want to throw in the towel and  
9 eat whatever I want. I wish you would call. I've been trying  
10 to call you to invite you on a walk. I figured it would be  
11 pretty safe in the middle of the night and I get to burn some  
12 calories, but I just can't seem to reach you.

13 Q And then the responsive e-mail, can you read the text of  
14 that. On April 16th, 2011.

15 A Thinking of you. Open attachment when you are alone.

16 MS. HAJJAR: Your Honor, can I show something to the  
17 witness for identification only.

18 THE COURT: Sure.

19 MR. AGNIFILO: Can we have a quick side-bar, Judge?

20 THE COURT: Sure.

21 (Side-bar conference held on the record out of the  
22 hearing of the jury.)

23

24 (Continued on following page.)

25

Side-Bar

3632

1 (Side-bar.)

2 THE COURT: Okay.

3 MR. AGNIFILO: So, the objection is, I think where  
4 the prosecutor's going to go, she's going to give an image to  
5 the witnesses that -- a highly pornographic image. And my  
6 understanding is she is not going to put the image into  
7 evidence, but she's going to have her describe it. And I  
8 think I object. I don't know -- I can show Your Honor what  
9 the image is and the description of it I assume would be, you  
10 know, fairly graphic.

11 And so, I just object to this portion of the  
12 testimony.

13 THE COURT: All right.

14 Is that what you are going to do?

15 MS. HAJJAR: It is very graphic, Your Honor. It's  
16 being sent to a 19-year-old girl by the defendant and I think  
17 it's important to elicit what is being sent to her. I will  
18 have the witness describe it rather than show the image to the  
19 jury, but it is significant.

20 MR. AGNIFILO: I can show the Court.

21 THE COURT: Is there an Exhibit Number?

22 MS. HAJJAR: It's 198, Your Honor.

23 THE COURT: Who has got the image?

24 MR. AGNIFILO: I have it.

25 (Pause in the proceedings.)

Side-Bar

3633

1 MR. AGNIFILO: I just think there's been a lot of  
2 very graphic, sexual testimony. I don't know that this  
3 advances the ball.

4 THE COURT: Well, that is pretty extreme.

5 MR. AGNIFILO: Yes, I think so.

6 THE COURT: No, no, no, no. I look at it a little  
7 differently. It is a little extreme and the question is, what  
8 is the evidentiary value as opposed to the possible harm that  
9 it will do? Let's just talk about this in strictly medicinal  
10 terms.

11 MS. HAJJAR: What's significant, Your Honor, is  
12 that -- there are two things. One is the relationship when it  
13 begins; that so early on, this relationship is highly  
14 sexualized. But what's significant about this image is that  
15 it's a BDSM like, slave-master-type image. So early. That  
16 happened, that we just, as opposed to the rest of the day  
17 discussing text messages and messages that talk about these  
18 types of things in 2015, but the fact that this was the nature  
19 of the tenor of this highly-sexualized relationship that has a  
20 BDSM component so early on is significant.

21 MR. AGNIFILO: I mean, I think we can't lose sight  
22 of the fact the defendant is not charged with any of this.

23 THE COURT: What about that?

24 MS. HAJJAR: He is, Your Honor. What ends up  
25 happening with Camila is that she, as Lauren Salzman's



Side-Bar

3634

1 testified, when Nicole testified --

2 THE COURT: Hold on.

3 (In open court.)

4 THE COURT: Could I ask everyone to please -- excuse  
5 me. Could I ask everyone to please take conversation out of  
6 the courtroom. We have the jury in the box and I would not  
7 want to jury to overhear anything that would be inappropriate.

8 Thank you.

9 (Side-bar continues.)

10 MS. HAJJAR: Your Honor, later this week Nicole will  
11 testify that she was tied up, tied to a table and someone she  
12 didn't know performed oral sex on her. Lauren Salzman  
13 testified that the person who performed that oral sex was, in  
14 fact, Camila. The fact that nearly ten years prior to that  
15 this is the image and that's being sent to Camila by the  
16 defendant is significant, Your Honor. I think it has a  
17 significant probative value.

18 THE COURT: All right. Well, let me see how far you  
19 get. At some point, I may stop you. But some discussion of  
20 this is appropriate and I do not think there is a 403 problem.

21 In this case there is so much going on that it is  
22 hard to identify where something becomes far more prejudicial  
23 than it is probative. But some of the discussion is so  
24 extreme that I am not sure where we have that dividing line.

25 You are not going to show the picture and be careful

1 what questions you ask.

2 MS. HAJJAR: Okay, Your Honor.

3 THE COURT: The objection is overruled.

4 MR. AGNIFILO: Thank you.

5 (Side-bar end.)

6

7 (Continued on following page.)

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Rees - direct - Hajjar - WhatsApp Chats

3636

1 (In open court.)

2 THE COURT: Okay. Thank you everybody.

3 You may continue your examination.

4 BY MS. HAJJAR:

5 Q Agent Rees, I'm going to show you, just to you, an image  
6 that's accompanied -- did this image accompany the e-mail that  
7 is we were just reading?

8 THE COURT: This is Exhibit Number?

9 MS. HAJJAR: It's marked as 1400-198.

10 Do you see it?

11 THE WITNESS: Yes, I do.

12 Q And can you describe to the jury generally what this  
13 image is of?

14 A This is an image of a BDSM act in which a woman is bound  
15 by her hands and legs as well as a hook. It appears to be a  
16 ceiling in giving -- performing oral sex to a male.

17 MS. HAJJAR: I'd like to show you what's been marked  
18 for identification only as 1400-202.

19 Q Is this a responsive e-mail to the e-mail you just  
20 referred to, Agent Rees?

21 A Yes, it is.

22 MS. HAJJAR: Your Honor, the Government offers  
23 Government's Exhibit 1400-202 into evidence.

24 MR. AGNIFILO: One second, Your Honor?

25 THE COURT: Sure.

Rees - direct - Hajjar - WhatsApp Chats

3637

1 (Pause in the proceedings.)

2 MR. AGNIFILO: We do object, Your Honor. On some of  
3 the grounds that we discussed.

4 THE COURT: Yes, I heard. Grounds at side-bar?

5 MR. AGNIFILO: No, more that we talked about this  
6 morning.

7 THE COURT: I see. Okay.

8 (Pause in the proceedings.)

9 THE COURT: Overruled.

10 MS. HAJJAR: Your Honor, may I publish this Exhibit?

11 THE COURT: Yes, you may.

12 (Government's Exhibit 1400-202 received in  
13 evidence.)

14 (Exhibit published.)

15 Q At the bottom, Agent Rees, the e-mail from  
16 CamilasCastle@yahoo.com to CamilasCastle@yahoo.com. Is this  
17 the responsive e-mail to the e-mail that held the attachment  
18 you just described?

19 A Yes, it is.

20 Q Is part of the text the e-mail says: Oh, my God, ha ha  
21 ha, crafty I must say but it looks a little uncomfortable?

22 A That's correct.

23 MS. HAJJAR: And last e-mail Agent Rees, I would  
24 like to show the witness for identification.

25 THE COURT: Go ahead.

Rees - direct - Hajjar - WhatsApp Chats

3638

1 MS. HAJJAR: Exhibit 1400-62.

2 Q Agent Rees, is this another CamilasCastle@yahoo.com to  
3 CamilasCastle@yahoo.com e-mail chain?

4 A Yes, it is.

5 MS. HAJJAR: The Government offers 1400-62,  
6 Your Honor.

7 MR. AGNIFILO: One second, Judge.

8 (Pause in the proceedings.)

9 MR. AGNIFILO: We do object.

10 THE COURT: Can I see what is at the bottom.

11 Overruled.

12 (Government's Exhibit 1400-62 received in evidence.)

13 (Exhibit published.)

14 MS. HAJJAR: Thank you, Your Honor.

15 Q Agent Rees, starting at the bottom this is another chain  
16 of E-mail the from CamilasCastle@yahoo.com?

17 A Yes, it is.

18 Q The bottom e-mail, that subject line: Couple thoughts  
19 for you.

20 Is that dated June 13th, 2009?

21 A It is.

22 Q And has the first three words: Hi sweet lollipop?

23 A Yes, it does.

24 Q And then, next e-mail. The responsive e-mail, June 13th,  
25 2009, is that another CamilasCastle@yahoo.com to

Rees - direct - Hajjar - WhatsApp Chats

3639

1 CamilasCastle@yahoo.com?

2 A Yes, it is.

3 Q Can you read the text of this e-mail, please?

4 A Yes. I can't wait to do all the things I've planned.

5 Hmm, the three-way thing I would do with you. I think I would  
6 have to be there. Read your sentence on this. It sounds as  
7 though you might do it without me. I suspect this is not what  
8 you meant. Keep me informed. We will figure it out on a  
9 step-by-step basis. Until, of course, I tie you up and force  
10 your pussy to be licked.

11 Q Then the last e-mail on the top. Another responsive  
12 e-mail on June 15th, 2009?

13 A That's correct.

14 Q And that's 1:04 a.m.?

15 A Correct.

16 Q Can you read the last paragraph, please.

17 A Well, with that said, I am happy to announce that today  
18 was the beginning of a new three-month cycle of pills. Smiley  
19 face. Which means if you so choose to accept your challenge,  
20 lots and lots of practice. There are some things that I want  
21 to learn and explore. By the way, I am very curious as to  
22 what you say you want to do to me. How exactly do you see me?  
23 Am I not virgin Camila? Yours Truly, Cami.

24 Q Agent Rees, I want to switch back or direct your  
25 attention to vicibaby@gmail.com and a photograph that you

Rees - direct - Hajjar - WhatsApp Chats

3640

1 testified they were photographs associated with the account  
2 that were provided by Google?

3 A That's correct.

4 Q The photographs have accompanying metadata for them?

5 A That's correct.

6 Q Okay.

7 MS. HAJJAR: And so, I'm showing you what's in  
8 evidence as Government's Exhibit 1160.

9 (Exhibit published.)

10 Q At the top. What is does this appear to be?

11 A A screen shot of a WhatsApp conversation.

12 Q And what's the name at the top of the screen shot?

13 A Unknown caller.

14 Q And can you read the texts that appear under unknown  
15 caller.

16 A I am crying again.

17 Are you almost home.

18 It's going to be almost 24 hours since I heard from  
19 you.

20 I miss you.

21 Can you Skype from the airport.

22 Our last chance.

23 Hi my sweetheart.

24 Are you almost home.

25 In LA, no texts.

Rees - direct - Hajjar - WhatsApp Chats

3641

1 Shit, I still don't have a signal.

2 Taking off for New York, Monkey is stuck.

3 Landed in New York.

4 Q Now, are the texts in green and the texts in white  
5 different users?

6 A Yes.

7 Q Can you tell which is which?

8 A By the color of the text message box.

9 Q And so the top messages in green are one user and the  
10 bottom are mother?

11 A That's correct.

12 Q And then the metadata associated with this image?

13 (Exhibit published.)

14 Q Can you just read the creation date and time?

15 A January 5th, 2016 at 20:14 PST.

16 Q Okay. All right, Agent Rees, is there a pregnancy test  
17 photograph that you also reviewed in the Vicibaby account?

18 A Yes, there was.

19 Q Does it reflect a positive pregnancy test?

20 A It did.

21 Q Was there accompanying metadata for that as well?

22 A There was.

23 MS. HAJJAR: I'm showing what's in evidence as  
24 Government's Exhibit 1164.

25 (Pause in the proceedings.)



1 MS. HAJJAR: I believe it's in evidence, Your Honor.

2 THE COURT: I'm sorry, why isn't it up?

3 You know, it's 5:00 o'clock. We can suspend for the  
4 night and work on this overnight.

5 MS. HAJJAR: That's fine, Your Honor, thank you.

6 THE COURT: All right?

7 All right, Members of the Jury, this is to remind  
8 you again that it is very important that you not discuss this  
9 case with anyone; not your family, friends, business  
10 associates and not your fellow jurors.

11 In addition, do not read, listen to, watch or access  
12 any accounts of this case on any form of media such as  
13 newspapers, TV, radio, podcasts or the internet, nor research  
14 or seek outside information about any aspect of the case, and  
15 do not communicate with anyone about the case on your phone,  
16 whether through e-mail, text messaging or anything other  
17 means, through any blog or website or by way of any social  
18 media including Facebook, Twitter, Instagram, YouTube or other  
19 similar sites.

20 Please do not consider anything you have read or  
21 heard about this case outside this courtroom, whether you read  
22 it before or during the jury selection or at this trial. And  
23 do not visit any of the locations mentioned during the course  
24 of jury selection or trial.

25 See you tomorrow morning at 9:30, thank you very

Proceedings

3643

1 much for your attention.

2 All rise for the jury.

3 THE COURTROOM DEPUTY: All rise.

4 (Jury exits.)

5 (In open court; outside the presence of the jury.)

6 THE COURT: All right. The witness may stand down.

7 Do not discuss your testimony with anyone.

8 THE WITNESS: Thank you.

9 THE COURT: See you tomorrow morning at 9:30.

10 (Witness excused.)

11 THE COURT: Please be seated, everyone.

12 About how much more do you have?

13 MS. HAJJAR: Ten to fifteen minutes, Your Honor.

14 THE COURT: All right.

15 About how much on cross?

16 MR. AGNIFILO: Ten, fifteen minutes tops.

17 THE COURT: Then the next witness is who?

18 MR. LESKO: Dr. Dawn Hughes.

19 THE COURT: And Dr. Hughes will be on the record for  
20 about how long?

21 MR. LESKO: I think direct will be maybe a little  
22 more than an hour.

23 THE COURT: All right.

24 Do you have a sense of the cross?

25 MR. AGNIFILO: My colleague is going to cross

1 Dr. Hughes.

2 MR. DerOHANNSIAN: Perhaps an hour to two.

3 THE COURT: Okay. That is fine.

4 After that, do we have another witness?

5 MS. PENZA: We have Nicole after that.

6 THE COURT: Nicole comes after that.

7 MS. PENZA: Yes.

8 THE COURT: Her direct will be about -- will that  
9 take us into Friday?

10 MS. PENZA: Yes, Your Honor.

11 Hopefully, be finished by the lunch break on Friday.

12 THE COURT: All right.

13 MR. AGNIFILO: The direct?

14 MS. PENZA: Yes.

15 THE COURT: Yes.

16 MR. AGNIFILO: So, I would think we could probably  
17 finish, if that's the case, on Friday with cross.

18 THE COURT: All right.

19 Next week we have all five days.

20 MR. AGNIFILO: Right.

21 THE COURT: Do you have a sense of the light at the  
22 end of tunnel here?

23 MS. PENZA: Yes, Your Honor.

24 The Government is hoping to rest either late next  
25 week or very early the week after.

Proceedings

3645

1 THE COURT: All right. It is good to have that  
2 information.

3 You are going to have your proposed charge for the  
4 jury by this Friday?

5 MS. PENZA: Yes, Your Honor.

6 MR. AGNIFILO: Yes, Judge.

7 THE COURT: Okay.

8 All right, we will see you tomorrow morning, 9:30.

9 MR. AGNIFILO: Thank you.

10 THE COURT: Oh, before we adjourn, am I going to get  
11 a letter at 5:00 o'clock in the morning again?

12 MR. AGNIFILO: Only if I wake up at 3:00.

13 THE COURT: No, I am just worried that maybe -- you  
14 know, my problem is I would rather have us discuss whatever it  
15 is to discuss at 9:00 a.m. rather than at 9:30 because the  
16 jury is already here at 9:30, and I really do not want to keep  
17 them waiting, especially if I am asking them to stay until  
18 5:30.

19 MR. AGNIFILO: No, I cannot think of any issue.

20 MS. PENZA: Well, Your Honor, we've raised a couple  
21 issues with Defense Counsel and we would like to write on them  
22 if there is going to be an issue, so.

23 THE COURT: Oh, this is your turn? For a 5:00 a.m.  
24 letter?

25 MS. PENZA: Well, we are hoping to avoid a 5:00 a.m.

1 letter.

2 THE COURT: Well, try to avoid it.

3 MR. AGNIFILO: There are three things I think that  
4 the Government's concerned about, one of which I agree with  
5 them. The other two, I have to think about. I might not  
6 agree with them on the other two.

7 THE COURT: I see.

8 All right. Well, try to work it out. I will see  
9 you tomorrow morning at 9:30.

10 Thank you very much, have a good evening.

11

12 (Matter adjourned to Wednesday, June 6th, 2019 at  
13 9:30 a.m.)

14

15 ooo0ooo

16

17

18

19

20

21

22

23

24

25

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

I N D E X

WITNESS

PAGE

JAMES LOPERFIDO

CROSS EXAMINATION BY MR. AGNIFILO

3389

REDIRECT EXAMINATION BY MR. LESKO

3421

MAEGAN REES

DIRECT EXAMINATION BY MS. HAJJAR

3440

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

E X H I B I T S

Government's Exhibits 301, 301-R, 302, 302-R, 305 to 308, 305-R to 308-R, 310, 310-R, 527 to 534, 1145, 1147 to 1158, 1160 to 1162, 1164 to 1166, 1183 to 1191, and 1701 to 1737, 1739, 1742 to 1746, 1748 to 1756, 1764, 1767 to 1777, 1779, 1781 to 1782, 1784 and 1789	3443
Government's Exhibit 377 and 378	3446
Government's Exhibits 1400-4, 1400-6, 1400-23, 1400-25, 1400-30, 1400-45, 1400-65, 1400-99, 1400-134, 1400-151, 1400-197 and 1400-198	3617
Government's Exhibit 1400-202	3637
Government's Exhibit 1400-62	3638