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1 P R O C E E D I N G S

2 --oo0oo--

3
4 (In open court; outside the presence of the jury.)

5 THE COURT: All right. Everyone can be seated.

6 Good morning.

7 MS. PENZA: Good morning, Your Honor. Moira
8 Penza, Mark Lesko, and Tanya Hajjar for the Unites States,
9 and along with us is Special Agent Michael Weniger from the
10 FBI and paralegal specialist, Teri Carby.

11 THE COURT: Good morning.

12 MR. AGNIFILO: Good morning, Your Honor. Marc
13 Agnifilo and Teny Geragos, also at Defense table is Mr. Paul
14 DerOhannesian and Danielle Smith for Mr. Keith Raniere, and
15 Mr. Raniere, who is with us this morning.

16 THE COURT: Good morning.

17 All right. Anything before we start?

18 MS. HAJJAR: Your Honor, there's just one matter
19 before we begin. The request for the return of collateral,
20 Your Honor ruled on one of those requests. There are
21 e-mails that were sent by DOS members to, among others,
22 Lauren Salzman, members of the national executive board and
23 others, asking for their collateral back and saying the
24 collateral was obtained through fraud.

25 Those requests for collateral we do intend to

1 admit three of them through this witness because they
2 establish her -- the fact that she received these requests
3 and did not conspire with them, and that the requests
4 themselves involve a list of the collateral that has been
5 provided and she received them, was on notice that the fact
6 that they were request for collateral were provided to her,
7 you know, on the basis of fraud and ignored those requests
8 at NXIVM's direction and sent them to other members of
9 NXIVM, including Clare Bronfman.

10 That's an important and significant part of that
11 narrative and so we do expect to introduce those exhibits at
12 some point today.

13 MR. AGNIFILO: And we object, Your Honor, on two
14 bases, Judge.

15 First, these are e-mails that a purported DOS --
16 persons in DOS sent to her lawyer after Keith Raniere was
17 arrested. And in this e-mail, this woman is making specific
18 allegations of criminal conduct in regard to how her
19 collateral was obtained saying it was obtained by fraud,
20 without her consent and things like that. And I think this
21 is *Heartland Crawford* material because it's being sent to
22 her lawyer, who is at the moment is a civil lawyer, but she
23 knows at the time she's sending it to her lawyer that
24 Mr. Raniere's been arrested. She's preserving her version
25 of facts, and when Judge Scalia -- deceased Justice Scalia

1 wrote in the *Crawford* decision that the thing that he was
2 targeting in the Supreme Court of the United States was
3 targeting was prosecution through this sort of affidavit,
4 you know, written statements that are uncross-examinable,
5 this is precisely what the *Crawford* decision is talking
6 about, because I have no ability -- when this person says
7 this collateral was gained through fraud, I can't
8 cross-examine her. She's not going to testify. She
9 testifies, we're in a different ballpark, but if she doesn't
10 testify, I can't cross-examine her and here she is making
11 written, specific allegations of criminal conduct at a time
12 when there's a criminal action pending and at a time when
13 she has an attorney and she's forwarding them to her
14 attorney.

15 So I think in addition to it being hearsay, it's
16 *Heartland* Sixth Amendment. We have a Sixth Amendment right
17 to confront our accusers. If we can't confront this woman
18 on why she's making these allegations, I think we have a
19 Sixth Amendment confrontation problem and I object.

20 MS. HAJJAR: Your Honor, just some factual
21 clarification. I don't think that the e-mails were
22 provided to the -- the e-mails were sent directly to
23 Ms. Salzman, among others. Ms. Salzman, they were forwarded
24 to the defendant, they were forwarded to Clare Bronfman, who
25 upon receipt, decided to promulgate a different narrative

1 about what had happened with DOS. I don't believe it's
2 factually accurate that they were provided to counsel first.
3 These were requests for collateral which were the product of
4 extortion and that was the intent of sending those e-mails
5 request collateral back. So it's significant. It's part of
6 the act of extortion, part of the act of wire fraud to
7 request the materials that were the product of those funds,
8 and it's important to explain what Ms. Salzman did and why
9 she did it. And the fact that other members of NXIVM knew
10 about what was being asked and knew about DOS at the
11 particular times these e-mail were sent.

12 THE COURT: Well --

13 MR. AGNIFILO: Judge, there's an e-mail sent by
14 someone named Carly, and I think Your Honor already ruled
15 that that was included under 403, if I'm not mistaken. And
16 then, from what I understand, this application, there are
17 e-mails sent by, I don't know what we're calling this
18 person, K is her first initial of her first name and --

19 THE COURT: Did you know about this before today?

20 MR. AGNIFILO: Well, we know we got a list of
21 proposed exhibits yesterday afternoon and we've been
22 discussing it. And we reached agreement on some and we
23 didn't reach agreement on some and these are some that we
24 didn't reach agreement on.

25 MS. HAJJAR: These exhibits were provided some

1 time ago, Your Honor, and --

2 THE COURT: May I see the exhibits?

3 MS. HAJJAR: Yes.

4 THE COURT: You can all sit down. Thank you.

5 All right. Take a short break and I'll take a
6 look at it.

7 MS. HAJJAR: Thank you, Your Honor.

8 MR. AGNIFILO: Your Honor, can I just remind the
9 Court, Your Honor deals with 1473 in Your Honor's May 14th
10 order on Page -- bear with me -- Page 5.

11 MS. HAJJAR: And, Your Honor, at that time,
12 Your Honor left open the possibility that the Government can
13 establish the theory on which these exhibits are admissible.
14 This is that moment, Your Honor.

15 THE COURT: All right. Thank you.

16 (Recess taken.)

17 THE COURT: All right. Please be seated. Of the
18 three documents, Government's Exhibit 418 --

19 MR. AGNIFILO: I'm sorry, Your Honor. I
20 apologize. Can I interrupt you?

21 We're waiting for Mr. Raniere to come out. I
22 don't mean to interrupt you. I apologize.

23 THE COURT: No, no, that's fine.

24 All right. I've reviewed the three documents,
25 Government's Exhibit 418, 428, and 1473, and I'm not going

1 to permit their introduction. I mean, first of all, this
2 individual, if you want to produce the individual and have
3 the individual testify, that's one thing, subject to
4 cross-examination.

5 The other is that this witness, you can question
6 the witness on whether she received demands for the return
7 of collateral and if she doesn't remember, you can show them
8 to her to refresh her recollection. And I'll give you a
9 wide opportunity to go into that. But I'm going to -- I'm
10 barring the introduction of those three exhibits because
11 they are pretty specific in the accusations against
12 Mr. Raniere. So let's move on.

13 Anything else?

14 MS. HAJJAR: Yes, Your Honor. Just on the
15 specificity of the allegations, these exhibits were sent to
16 not only Ms. Salzman, but others in July and September
17 of 2017.

18 THE COURT: Okay. On the NXIVM board?

19 MS. HAJJAR: Yes.

20 And subsequent to that, Your Honor, members of the
21 NXIVM board and others, including the defendant, including
22 Ms. Bronfman put out public statements in support of DOS
23 saying that it was a women's organization. That it was a
24 good thing. That they didn't -- denying understanding that
25 there were -- that members were unhappy, that they sought

1 their collateral back and denying the content of these
2 letters. So in the Government's view, these are significant
3 because of the timing of them. These e-mails were sent to
4 Ms. Bronfman. They were sent to members of the executive
5 board, all of whom were on notice about what was being said
6 by DOS and another one put out false statements regarding
7 DOS and regarding the defendant's involvement in it. That's
8 significant in the Government's view, Your Honor.

9 THE COURT: What am I supposed to be doing about
10 that?

11 MS. HAJJAR: Your Honor, we offer them for -- even
12 for the purpose of establishing that they were sent for
13 that -- not for its truth of the content of the e-mail, but
14 for the fact that they were sent to the individuals in that
15 e-mail at the time they were sent.

16 THE COURT: Are you trying to get in the e-mails
17 that were sent out by the DOS members? By NXIVM? What are
18 you trying to achieve? I've already ruled on these. I'm
19 not going to change my ruling on these.

20 MS. HAJJAR: Then I think it's important,
21 Your Honor, to elicit that even if the exhibits themselves
22 are not admitted, that the content of the e-mail and to whom
23 they were sent, the fact that they were sent to the
24 executive board and to Ms. Bronfman in July, in September
25 prior to the public statement that NXIVM made.

Salzman - Direct - Hajjar

1593

1 THE COURT: You can ask.

2 MS. HAJJAR: Okay. Thank you, Your Honor.

3 THE COURT: Okay. Anything else?

4 (No audible response.)

5 THE COURT: Okay. Let's bring in the witness,

6 first.

7 (The witness resumes the witness stand.)

8 (Pause in proceedings.)

9 (Jury enters the courtroom.)

10 (Jury present.)

11 THE COURT: Please be seated.

12 Good morning, Members of the Jury.

13 ALL JURORS: Good morning.

14 THE COURT: All right. At this time we're going
15 to continue with the direct examination of Lauren Salzman.

16 And I remind the witness that she is still under
17 oath.

18 **L A U R E N S A L Z M A N,**

19 called as a witness, having been previously duly
20 sworn, was examined and testified as follows:

21 THE COURT: Ms. Hajjar, you may continue.

22 MS. HAJJAR: Thank you, Your Honor.

23 DIRECT EXAMINATION (CONTINUED)

24 BY MS. HAJJAR:

25 Q Good morning, Ms. Salzman.

Salzman - Direct - Hajjar

1594

1 A Good morning.

2 Q Ms. Salzman, you testified on Friday that you were a
3 first-line master in DOS?

4 A Yes.

5 Q Can you tell the jury what that means in terms of the
6 general structure of DOS?

7 A Yes. So first line meant that we were -- that Keith
8 was our master and we were enrolled directly under him. So
9 we were considered slaves under him as our master. And then
10 the second line would be the women that we enrolled who we
11 were their master and they were slaves under us and it went
12 down four lines.

13 Q And aside from the defendant, who was at the top, was
14 everyone in DOS female?

15 A Yes.

16 Q Who initially recruited you into DOS in January
17 of 2017?

18 A Keith with Rosa Laura.

19 Q And is that Rosa Laura Junco?

20 A Yes.

21 Q I'm showing you what's already in evidence as
22 Government's Exhibit 363. Does Government's Exhibit 363
23 depict the defendant and everyone who was a first line
24 master in DOS?

25 A Yes, it does.

Salzman - Direct - Hajjar

1595

1 Q At the time you were recruited into DOS, were you aware
2 of the defendant's role as your master?

3 A Yes, I was.

4 Q Was that true of the other first -- of the other women
5 in the first line of DOS?

6 A That they were aware that he was their master? I
7 believe so. I mean, they were all enrolled before me, so
8 they all had him as their master prior to my enrollment.
9 And when Rosa Laura enrolled me, she told me that he would
10 be my master wherein under normal circumstances, because she
11 was doing the enrollment, she would have been. She
12 explained that my commitment would be with him.

13 Q Prior to joining DOS, were you aware of the defendant's
14 sexual relationships with first-line DOS masters?

15 A Some of them.

16 Q Who?

17 A Nicky, Loreta, and Monica.

18 Q Did you later come to learn the defendant had sexual
19 relationships with other first-line DOS masters?

20 A Yes.

21 Q Who?

22 A Everyone except Rosa Laura.

23 Q I want to talk a little bit about the members in the
24 first line starting with Camila. When did you first meet
25 Camila?

Salzman - Direct - Hajjar

1596

1 A I met Cami in the early 2000s. Her family had come to
2 New York. Her sisters moved first and then the parents.
3 They rented an apartment, and the two younger siblings, Cami
4 and her brother joined soon after.

5 Q How old was Camila when you first met her?

6 A I'm not a hundred percent sure, but I want to say
7 around 14 -- 13, 14.

8 Q And you testified that Camila was the sister of
9 Daniella and Marianna?

10 A Correct.

11 Q And she was the youngest sister?

12 A Yes.

13 Q Where did she live?

14 A Initially the family rented an apartment in Cohoes,
15 which was like a town or two over from where the rest of us
16 lived in Clifton Park. And then later they rented an
17 apartment in Knox Wood, the development where all of us
18 lived.

19 Q What about after that?

20 A Where Camila lived? So she lived at 12 Wilton Court
21 with her family for a period of time and then eventually
22 moved to an apartment on Victory Way. I'm not sure of the
23 number.

24 Q How did you know that?

25 A After I was in DOS she would ask me to give her rides

Salzman - Direct - Hajjar

1597

1 to the DOS house, so I would pick her up or drop her off
2 outside.

3 Q Was there some secrecy as to where Camila was living at
4 the time?

5 A Yes.

6 Q Can you explain that further?

7 A Well, for the period of time when I think she was still
8 living at the Victory Way house, there was a story about how
9 she was actually living with Karen Unterreiner so there
10 was -- there was some people who believed she was living
11 with Karen and -- but she wasn't. And a lot of people
12 didn't know where she was. I didn't know where she was
13 living. I had asked Keith where she was living and he
14 didn't share with me.

15 But around 2015 I moved around -- about half a
16 mile away, and I had a personal assistant at the time named
17 Lucy who was good friends with Cami and she and her friends
18 had like a lot of, like, curiosity and speculation about
19 what was going on with Camila. How come nobody could go to
20 the house? Why they didn't feel the friendship was as open
21 as they all had with the rest of their group of friends.
22 And eventually Lucy told me that she figured out where Cami
23 lived because she saw Keith coming and going from Cami's
24 house. And I wasn't permitted to know or nobody told me.
25 Keith didn't tell me. And until -- until -- Keith never

Salzman - Direct - Hajjar

1598

1 told me, and eventually Cami told me herself where she was
2 living after I was enrolled in DOS.

3 Q What about Daniella Padilla Bergeron, can you tell the
4 jury a little bit about her background, where she was from?

5 A Sure. So I met Daniella in 2001 in Monterrey, Mexico,
6 at the first course that we taught down there. And
7 Monterrey -- my understanding of Monterrey is that it's the
8 wealthiest city in Mexico. It's a very conservative
9 Catholic city, and everybody kind of knows each other. But
10 she's from like an upper-class family in that community.

11 Q What was her rank in ESP?

12 A She was a proctor.

13 Q And is that a relatively high rank?

14 A Yes. It's the management level.

15 Q Now, as to Nicky Clyne, can you tell the jury a bit
16 about her background?

17 A Nicky came from Vancouver, Canada. Her mom was a
18 teacher. Her parents were divorced, and she was an actress.
19 So she comes, I think, more from a middle-class background
20 than -- you know, childhood experience in the entertainment
21 industry.

22 Q Is she a Canadian citizen or an American one?

23 A Canadian.

24 Q What about Loretta Garza?

25 A Loretta's family is from another city outside of

Salzman - Direct - Hajjar

1599

1 Monterrey, but her grandmother was from Monterrey. I
2 understand she moved there as a teenager and went to high
3 school there, and then I believe studied abroad in Ireland
4 for a bit, came back. And when I met her, she was working
5 for a telecommunication company in Monterrey in the early
6 2000s. And then later, she moved to Albany and worked as my
7 mom's personal assistant for a bit and then eventually
8 Keith's assistant.

9 Q Rosa Laura Junco, what was her background?

10 A Rosa Laura also was from Monterrey. Her family, as I
11 understand, owns a large part of the print media in Mexico.
12 They're a newspaper. They own a reputable newspaper called
13 *The Reforma*. And very wealthy family.

14 Q Was she married?

15 A Yes. When I first met her she was married, had three
16 children. Was later divorced and then remarried and had
17 another two children.

18 Q Did she have a daughter?

19 A She has a daughter, yes.

20 Q And did the daughter have her name?

21 A Yes. Daughter -- her mother and her daughter and she
22 all had the same name.

23 Q Is there a nickname version for Rosa Laura?

24 A Laureis. So sometimes, though, I called my friend
25 Rosa Laura, Laureis. But her daughter was -- also was

Salzman - Direct - Hajjar

1600

1 Little Laureis.

2 Q And what about Monica Duran?

3 A I think Moni comes from Chihuahua or Tampico, Mexico.
4 I don't know much about her background. But she joined ESP
5 early on and I think began her relationship with Keith
6 somewhere around, the time I did so I would say early 2000s,
7 like 2001 or 2002. And she moved to Albany and, you know,
8 lived in Albany with us for a couple decades.

9 Q And you called her Moni. Was that a nickname for her?

10 A Moni. Yeah, short for Monica.

11 Q What about Allison Mack?

12 A Ali's from California near Los Angeles. She was a
13 childhood actress, so she grew up in the entertainment
14 industry. Her father was a professional opera singer and
15 her mother was her manager, as I understand, of her career.

16 Q When you joined DOS, were these other DOS masters
17 already enrolled in DOS?

18 A Yes. Yes, they all were.

19 Q And directing your attention to January or
20 February 2018, did you have a conversation with Nicky Clyne
21 about how she joined DOS?

22 A Yes.

23 Q What did she tell you?

24 A She told me that originally she had this commitment
25 with Keith, and that she thought she was the only one who

Salzman - Direct - Hajjar

1601

1 had that relationship -- like she was his slave and he was
2 her master and that was a thing that she thought they were
3 just doing together just them. And then later, she came to
4 learn that there were others that she hadn't, you know,
5 known about.

6 Q Did she struggle in particular with one other
7 first-line DOS master?

8 A With Allison. I mean, she struggled coming to learn
9 Keith's relationship with Allison.

10 Q Did Nicky Clyne get married while you were a member of
11 DOS?

12 A Yes, to Allison.

13 Q At the time, who did you believe Nicky Clyne to be in a
14 romantic relationship with?

15 A Keith.

16 Q Did you write a letter in support of Nicky Clyne and
17 Allison's -- their marriage?

18 A I did.

19 Q Ms. Salzman, you testified that there were other DOS
20 slaves under you --

21 A Yes.

22 Q -- you recruited them. How many did you recruit?

23 A Six in total.

24 Q And what were their first names?

25 A Sarah, Audrey, Jimena, Corolla, Amanda, and Charmel.

Salzman - Direct - Hajjar

1602

1 Q Were you given instructions about what you could tell
2 recruits into DOS?

3 A Yes, I was.

4 Q What were those instructions?

5 A That I was not to tell them about Keith's involvement.

6 Q Anything else?

7 A And that -- yes. Well, kind of -- and in effect, not
8 to tell them about his initials and the brand.

9 Q What were the requirements of being a DOS slave?

10 A It -- it was total nondisclosure, so complete secrecy
11 about anything happening in the group and a lifetime vow of
12 obedience to your master.

13 Q How were these requirements enforced?

14 A Well, initially there was a whole enrollment process.
15 But the first thing that happened is that the person who
16 would approach you to enroll you or -- or -- and this
17 happened with me, this is what I did with others as well,
18 would ask for collateral. And basically it was some sort of
19 either material possession or it could have been
20 information -- sensitive information, true or untrue. But
21 the idea was that it was something valuable enough or
22 damaging enough that would ensure a total commitment to
23 secrecy; that you would rather -- that you would keep a
24 secret like until you died than have this information come
25 out or have this -- you know, lose this possession, whatever

Salzman - Direct - Hajjar

1603

1 it was.

2 Then once you gave that collateral, you were told
3 a certain number of things about the sorority, about the
4 lifetime vow of obedience, the concept of the master and
5 slave. There was an idea of a collar which was, I was told
6 to be a chain -- a piece of jewelry that you would wear that
7 symbolized a chain to your master. And ideally this would
8 be a piece of jewelry that you could and would never take
9 off. And the brand. And then if you decided you wanted to
10 go forward and do this, you would collateralize all areas of
11 your life. So more material possessions, more damaging
12 information, as much as possible to secure your commitment
13 that you would never leave and you would never speak about
14 it. So the idea -- so the question about how it was
15 enforced is the collateral backed it. In essence, your fear
16 that if you were to go against what you had committed to,
17 that collateral would be subject to forfeiture or release.

18 Q And throughout this process would the defendant
19 instruct you that his role was to be concealed?

20 A Yes.

21 Q Did you provide collateral to join DOS?

22 A Yes.

23 Q Were there additional practices associated with DOS?

24 A Yes. There were a number of different practices.

25 There was a practice of checking in last thing before you

Salzman - Direct - Hajjar

1604

1 went to bed and first thing in the morning. So you would
2 say good night to your master before you went to bed, good
3 morning to your master first thing when you woke up.
4 Master -- you would call them master or M, but master was
5 always capitalized as were all pronouns. So if you referred
6 to them as you, the Y would be capitalized. He, she, they
7 were always capitalized when referring to the master.

8 Also we did a daily active self-denial or doing
9 something uncomfortable to build character, weekly acts of
10 care. And then, of course, there were other tasks or
11 assignments given.

12 Q Was readiness in DOS one of the practices as well?

13 A Yes, readiness.

14 Q So you talked about communication in the context of DOS
15 and good morning and good night. Can you explain exactly
16 what you did and what others did in DOS?

17 A In the communication? Most of what we did took place
18 in the -- in encrypted applications that you would have on
19 your phone. So mostly we used Telegram, and Telegram
20 allowed for you to have a locked chat thread and between
21 just two individuals. The group chats were not locked, but
22 we used Telegram for everything.

23 So in a locked Telegram thread I can send you
24 encrypted messages, and you could send me back encrypted
25 messages, and it allows for the function that if I wanted to

Salzman - Direct - Hajjar

1605

1 delete something in my chat, I could delete both my chat
2 from my -- my phone and your phone. So this was the type of
3 communication and the type of capacity that app had. But
4 those threads were locked so -- and encrypted so you would
5 have one with your master and then the same with any slaves
6 you had. So we have individual chats, each of us. I had
7 individual ones for each of my slaves, and then a group
8 chat, and one with me and Keith.

9 We also communicated on Signal which is another
10 encrypted app. But then I had group chats with my circle.
11 So the eight first-line DOS women I had to chat with me and
12 I had one with the group of all my slaves together with me
13 and they had one individually without me.

14 Q And what was the purpose of using Telegram or Signal as
15 opposed to just the normal SMS function or your phone?

16 A That it was encrypted and more secrecy, more security.

17 Q Did you receive notifications in Telegram or in
18 What'sApp if certain things happened?

19 A Yes. Well, specifically I mean, for readiness drills
20 we would -- we had special readiness threads. So we would
21 receive an alert that we were having a drill.

22 Q Can you describe what these drills were in the context
23 of readiness?

24 A Yeah. The readiness drill -- originally readiness was
25 something that we had done in SOP, which was the men's

Salzman - Direct - Hajjar

1606

1 organization, so it was unfamiliar to us. But the way that
2 we did it in DOS was different. So Keith would initiate a
3 readiness drill by sending a question mark in a group thread
4 to us and to the first line. The first line had 60 seconds
5 to respond that we received the communication and transmit
6 the readiness drill down to the second line. The second
7 line had 60 seconds to report it back to us and us to report
8 it to Keith and to get that communication down to the third
9 line and the same with fourth line. So each line it was 60
10 seconds to get the communication down and back up that it
11 had been completed.

12 Q Did your slaves know to whom you were reporting?

13 A No.

14 Q How often did you participate in these drills?

15 A Frequently. I mean, and -- and Keith wanted us to be
16 good at readiness, like effective and efficient at readiness
17 and so until we got readiness done, we couldn't move on to
18 certain other things. And when we failed at readiness, he
19 wanted to know how we would fix it. So we were taking
20 consequences for failing at readiness.

21 So what we started doing was practice readiness
22 drills. So each -- he would initiate readiness drills, it
23 could be every day, it could be a couple times a week,
24 sometimes it was less. But we started to want to practice,
25 and as we enrolled more and more people in readiness, it

Salzman - Direct - Hajjar

1607

1 became more and more complex and there were more and more
2 errors.

3 So at one point my group agreed -- when I say "my
4 group," my circle of first-line DOS masters, that each of us
5 you would initiate at least one practice drill throughout
6 the week. So we were -- my group was running eight drills
7 just with us, and then my slaves under me, I was -- I was
8 duplicating everything that was going on with us. So when
9 they had failures, similar to how Keith would ask us, what
10 are you going to do to fix the failure, I would say to them,
11 what are you going to do to fix the failure, so then they
12 started running practice drills as well.

13 So for some of the people lower in the chain,
14 there were a lot of drills.

15 Q When did the defendant initiate these drills?

16 A Whenever. But frequently it was -- it was at times
17 that we wouldn't be ready. Like I -- so that we would learn
18 to be ready all the time. So it could be in the middle of
19 the night. Sometimes it was concurrently at the same time
20 as the SOP readiness drill which increased the probability
21 that there would be failure because you're running drills
22 with two groups, and the complexity of DOS readiness was
23 there was a lot to do in a short amount of time in those
24 minutes.

25 But sometimes it just -- could be just random like

Salzman - Direct - Hajjar

1608

1 times you wouldn't expect.

2 Q Did the defendant sometimes initiate these drills in
3 the middle of the night?

4 A Yes.

5 Q And did you make certain arrangements so you can be
6 ready for the drill?

7 A Yeah. Some people had several phones so that they
8 wouldn't miss the drill. We had all -- our alerts on the
9 phone turned up to, like, the highest level volume and the
10 alert that would be most, like, most likely to wake you up
11 out of whatever sleep that you were in. And then everybody
12 had the different phone numbers you could be reached at. I
13 had a landline plus a cell phone. And then we had a buddy
14 system as well so that if somebody was missing in readiness,
15 you would go looking for them, and that if they -- if they
16 were missing, you were also accountable for their buddy. So
17 there was a lot that was involved.

18 Q You said -- well, were readiness drills secret?

19 A They were secret, which became very complex because
20 there's a lot that had to be done. Sometimes people would
21 be missing or you would have go looking for them.

22 You know, there was the four minutes that
23 everything had to happen within tracking the time of that,
24 tracking the number of people and keeping it secret from
25 everybody else who was in NXIVM who you were spending a lot

Salzman - Direct - Hajjar

1609

1 of time with because we were teaching intensive. So we were
2 in classes together for long periods of time or different
3 committees that we worked on together. Our whole social
4 group of friends was within this community, so it was hard.
5 It started to become hard to keep it secret. And also
6 because a number of people who were in DOS were supposed to
7 keep their enrollment or participation separate from each
8 other and then they would be in the same place and receive
9 the drill at the same time. So they started to identify who
10 each other was and then report back that there had been
11 breaches of that security, so to speak. And, you know, then
12 there were complexity surrounding that because nobody was
13 supposed to know who was in this group.

14 Q Were there consequences for failing at readiness?

15 A Yes, we took consequences.

16 MS. HAJJAR: Your Honor, may I show something to
17 the witness for identification only?

18 THE COURT: Sure.

19 Q Ms. Salzman, I'm showing you what's marked for
20 identification as Government's Exhibit 359.

21 A Yes.

22 Q Do you recognize that?

23 A I do, yeah.

24 Q What is it?

25 A This was the buddy system from my circle of first-line

Salzman - Direct - Hajjar

1610

1 DOS masters.

2 Q Who created this?

3 A Loreta Garza.

4 Q Did you have a copy of this personally?

5 A I did, yes. This copy was, I think, from my -- I
6 believe from my cell phone.

7 Q Why did you keep it on your cell phone?

8 A Because I couldn't remember the buddy system and it
9 needed to be easily accessible. It was complex because I
10 was accountable for Cami, but if she didn't come, I had to
11 go looking for her. But I also had to make sure that Dani
12 was there. And if Cami and Dani didn't show up, I had to
13 make sure Nicky was there. So I -- you know, there's eight
14 of us, so to remember the order of them and make sure
15 everybody was there checking on all the people while making
16 sure the communication went up in under a minute and down,
17 you know, in each of the lines and tracking the time was
18 incredibly complex. It was a lot of things at once. So I
19 had it there on the phone so that I could reference it
20 easily to remember to do that part of it.

21 MS. HAJJAR: Your Honor, the Government offers
22 Government's Exhibit 359.

23 THE COURT: Any objection?

24 MR. AGNIFILO: None, Your Honor.

25 THE COURT: All right. Government's Exhibit 359

Salzman - Direct - Hajjar

1611

1 is received in evidence, publish to the jury.

2 (Government's Exhibit Number 359 so marked and
3 received in evidence.)

4 THE COURT: I have a question. Was it ever
5 explained to you by anyone why these readiness drills were
6 necessary in order to be part of this organization?

7 THE WITNESS: Well, what I had understood from the
8 men's organization, from SOP, was that the readiness drills
9 were to help us build discipline and be responsive and to
10 create a very efficient responsive communications network to
11 disseminate information very quickly. And in the context of
12 the men's organization, we had used those drills, for
13 example, somebody was kidnapped one time in Mexico, and so
14 the communication network was -- was utilized in that case.
15 Another person went missing in a foreign country, and so I
16 had had prior experience of having this official and
17 effective communication system.

18 But in DOS it was a little bit different where it
19 was a lot more aggressive and there was less leniency in
20 failures and more focus on us just being ready and
21 responsive in discipline all the time. So I thought that it
22 was part of us learning to be disciplined to be aware and to
23 build these traits of characteristic in ourselves which we
24 come to learn that we didn't have and men did have.

25 THE COURT: All right. Thank you.

Salzman - Direct - Hajjar

1612

1 BY MS. HAJJAR:

2 Q Looking back now, Ms. Salzman, do you have a view of
3 the point of readiness in DOS?

4 A The point of it? Like in part of the point of it was
5 Keith's vision of this would be a very big organization at
6 some point, and we would be able to -- to get communications
7 out and move a lot of people in a short amount of time to do
8 different objectives which were undefined, you know, in the
9 theorizing of what that would be. But I think also there
10 was just having us always be prioritizing this above other
11 things and creating circumstances where we needed to choose
12 this again and again over other things, set aside other
13 things to make this the highest priority.

14 Q And when you say move a lot of people, the people you
15 are referring to are DOS slaves?

16 A DOS slaves, yeah.

17 Q Looking at Government's Exhibit 359, can you
18 identify -- can you explain this to the jury and identify
19 the people listed?

20 A Sure. So Camila's at the top -- this is our buddy
21 system. So Camila was at the top, and she was responsible
22 for Daniella and Daniella was responsible for Nicky, Nicky
23 was responsible for Loreta, Lola, as indicated in the chart.
24 Lola was responsible for Rosa Laura, indicated as Laureis in
25 the chart. Laureis responsible for Moni, Monica; Monica

Salzman - Direct - Hajjar

1613

1 responsible for Allison and Allison responsible for me. So
2 if one of us didn't show up to readiness, this told you who
3 you were responsible to contact, to go looking for, to find
4 them to show up for the readiness drill. But also you were
5 accountable to make sure that the person they were
6 accountable to in their absence was present, and if not, you
7 could end up -- you could end up being responsible for the
8 entire circle if you were the only one who showed up.

9 Q Was it acceptable in the context of DOS to be
10 unavailable for a long period of time?

11 A No. The -- in -- in SOP, the men's organization, there
12 was the concept of being dark, so you could be dark or
13 unavailable for a certain period of time. Some people would
14 go dark at night, some people, you know, during business
15 meetings, various family functions, do various things. In
16 DOS the kind of tag line on it was that there was no dark in
17 DOS, no dark.

18 So there were circumstances where it was
19 acceptable, like if you are on an airplane and completely
20 unreachable or something, to have a buddy take
21 responsibility for your line. But if you were absent, they
22 had to initiate their whole readiness drill plus your whole
23 line's readiness drill in your absence. So it was -- for
24 some people who had a lot of people in their organization,
25 like I did, it was a sizable workload to off-load onto a

Salzman - Direct - Hajjar

1614

1 buddy, you know, and especially if they had larger
2 organizations, but there were times where that was
3 necessary.

4 Q When you say you had a larger organization, are you
5 referring to the network of DOS slaves under you?

6 A Yeah. I had enrolled a number of people who had
7 enrolled a number of people who were enrolling a number of
8 people, so the group grew and readiness became more complex
9 as the group grew.

10 Q Were there times that you reorganized your life or
11 changed your schedule in order to be available for readiness
12 drills?

13 A Constantly. And some of them were difficult because if
14 they came -- so you didn't want to go dark that often or I
15 didn't, and we were trying to succeed at this and do it
16 well. Like sometimes it would come -- like one time it came
17 and I was driving and I had -- I crossed -- like be able to
18 pull over, I had to cross over like four lanes of traffic to
19 do it, and it wasn't safe to be doing all the time, not the
20 way we were doing it.

21 Q As a DOS slave were you expected to ask permission of
22 your master, in this case, the defendant?

23 A Yes, for different things. But I already did that in
24 my life with Keith. I mean, before I joined DOS I had
25 already asked Keith for permission for most things in my

Salzman - Direct - Hajjar

1615

1 life.

2 Q Did your DOS slaves ask permission of you?

3 A Some of them asked for some things, yeah.

4 Q Did you perform work for the defendant in DOS?

5 A Yes.

6 Q Can you explain what an active care was in the context
7 of DOS?

8 A Sure. We had -- we had had a community project in
9 Albany for the Albany NXIVM community and we had within that
10 community project guardians, and those guardians would do a
11 caring act once a week to help the person who you were the
12 guardian of. So the concept was familiar to me beforehand
13 from this project of learning to care about somebody just
14 for the sake of caring, like building that trait in
15 yourself, not because you were going to receive anything
16 back for it. So in DOS, that concept was brought and
17 employed in doing acts of care, things that would be caring
18 for your master every week. So you were -- we were assigned
19 once we joined that -- that we would do the these weekly
20 acts of care to build caring in ourselves and with the
21 thought of contributing something that would help the master
22 somehow in their life, in their work.

23 Q Were you required to perform acts of care?

24 A Yes.

25 Q And can you give some examples of what kind of acts of

Salzman - Direct - Hajjar

1616

1 care were performed for the defendant?

2 A So -- well, initially when I joined, I considered some
3 of the things that I did to work with people in his life to
4 help off-put his workload with those individuals, active
5 care. So I would do counseling sessions with people or help
6 in some of the different companies that he had founded. And
7 then sometimes, I -- like if I was going to the grocery
8 store, I would ask, Do you want -- I'm going to Whole Foods,
9 do you want something? Later he would start to point out
10 things that we had done that were uncaring. Like the time
11 he had left volleyball and walked to his car and found the
12 car cold. And so then we rearranged our schedule to make
13 sure that somebody was always there in the middle of the
14 night when he left volleyball to warm up the car. But I,
15 like, brought drinks to volleyball and things that I knew he
16 liked or wanted.

17 At one point I considered some of the other
18 project work I was doing for DOS acts of care, but then
19 later I was told that wasn't an act of care. Daniella came
20 to the group at one point saying we were misunderstanding
21 acts of care and we should be doing things that were more
22 devotional in some way. But I didn't really understand that
23 concept, and I didn't ever come to really understand what
24 she was bringing.

25 Q What other work were you required to do for the

Salzman - Direct - Hajjar

1617

1 defendant?

2 A Well, when I first joined, Keith said he wanted me to
3 help edit the book, the DOS book. So the book was like the
4 philosophy behind the sorority. So reading the whole book,
5 editing the transcripts of it, creating this book was
6 incredibly time-consuming, and I think one week I probably
7 spent 70 to 100 hours on this book, and it was something
8 very important. He wanted it done in an expedited amount of
9 time and would consistently check to make sure I was making
10 progress and telling me that I was -- my work capacity was
11 low. I wasn't getting it done in enough time.

12 Q Were you reimbursed, for example, for the groceries you
13 purchased for the defendant?

14 A No.

15 Q Did you also purchase groceries for someone else?

16 A Yes. Well, if I called him and asked him if I -- if he
17 wanted me to get something from Whole Foods, he would say,
18 Ask Marianna. So then I would call Marianna and get
19 Marianna's grocery list. So I would buy groceries for him
20 and Marianna.

21 Q Was that difficult for you?

22 A Yeah, it was really difficult for me.

23 And then also when I was told that I could just
24 leave the groceries in the garage, that was also really
25 hard. They were -- I mean, he was living with Marianna and

Salzman - Direct - Hajjar

1618

1 in many ways, I viewed that as who he chose to have a
2 relationship with instead of me, you know. It wasn't to the
3 exclusion of other relationships or anything, but that was
4 like his main -- that was the person he lived with. It was
5 a person I -- from my perspective, he spent most of his time
6 for and with, and it ended up being somebody that he
7 ultimately chose to have a child with, you know. So, yeah,
8 it was really hard for me to get groceries for him and
9 Marianna and leave them in the garage without even coming in
10 to say, Hi, when they were both in the house.

11 Q Did your slaves do work for you?

12 A Yes.

13 Q Did you discuss acts of care with the defendant at one
14 point?

15 A Yes. He came to -- well, he came to a meeting that I
16 was having at my house. We were having a meeting to put --
17 to discuss ethics protocols for the sorority, and he came to
18 the meeting and shared that he thought -- he was thinking
19 that each week each slave would put in an hour of work, give
20 an hour of work to their master or an hour of work and --
21 and an hour of work to their grand master. The concept was
22 so that if you had six slaves and at some point he decided
23 six -- there was something special about the number six.
24 Like if we each had six slaves who each had six slaves under
25 them, you would qualify for a special position and to

Salzman - Direct - Hajjar

1619

1 receive special privileges. I don't recall specifically the
2 privileges. But that if you had that you would have
3 40 hours, approximately 36, but approximately 40 hours of
4 work per week for life from these individuals.

5 Q Did he discuss a monetary substitute for this work?

6 A Yes. He shared that if they didn't -- he was thinking
7 if they didn't want to do the hour, that they could pay
8 dues, like some menial amount of money like \$15 a week or
9 \$20 a week, something like that. But it was preferable --
10 it was preferable for them to do the work.

11 Q Ms. Salzman, when you said the sorority in the meetings
12 earlier, do you mean DOS?

13 A Yes. Whenever I say the sorority, I mean DOS.

14 Q Or The Vow?

15 A Yes.

16 Q Those organizations, all the names are the same?

17 A Yes, same thing.

18 Q Was recruitment a focus in DOS?

19 A Big focus.

20 Q How so?

21 A Keith wanted us to grow and he wanted us to grow
22 quickly. He was checking in on how we were doing with
23 enrollment a lot, frequently, and wanted us to -- was
24 very -- pushing for us to get to 100 people, and then pushed
25 me specifically to get a hundred in my group alone in under

Salzman - Direct - Hajjar

1620

1 six weeks and was constantly asking like where -- how many
2 people do we have? Where are they in each stage of
3 enrollment? And, like, What are your projections and when
4 do you think we're going to get this number? How many more
5 are we going to get in this period of time? And so he
6 wanted us to be able to make those projections and have that
7 information readily accessible whenever asked.

8 Q Did the defendant express a preference for enrolling
9 people into DOS that were not part of the NXIVM community?

10 A Yes. He wanted us to get new people. Very much wanted
11 new people and people outside -- and people in positions of
12 power and influence.

13 Q Was enrollment in DOS documented in some way?

14 A Yes. We kept track of it in Excel spreadsheet and a
15 DropBox folder.

16 Q Did the defendant ever instruct you to make sure you
17 were tracking enrollment?

18 A Yes. Tracking it and tracking it down to like even the
19 minute that the person was enrolled and keeping track of the
20 order of everybody as they were enrolled. The number and
21 order were very important.

22 Q Were there certain stages of enrollment in DOS?

23 A Yes. There were four, but that ended up being five
24 stages of enrollment, which was somebody was a prospect.
25 Then they were -- they had submitted that first collateral

Salzman - Direct - Hajjar

1621

1 so they had made the commitment to secrecy. They were given
2 basically the pitch, you know, come to learn about lifetime
3 vow of obedience master/slave concepts, the collar and the
4 brand. Then they had agreed to join after learning those
5 things and then they were fully collateralized. So they
6 were not considered completely enrolled until they were
7 fully collateralized.

8 Q What does it mean to be fully collateralized?

9 A That they had provided substantial collateral in all
10 areas of their life of material possessions and information
11 on them.

12 Q Was one requirement of DOS to get a brand?

13 A Yes.

14 Q Did you get branded?

15 A I did.

16 Q What was the brand of?

17 A Keith's initials.

18 Q Did you know that at the time?

19 A I did, yes.

20 Q And what about the slaves under you, did they know?

21 A No. We were not allowed to tell them.

22 Q At any point did you or the other first-line DOS
23 masters express concern about the fact that the brand was of
24 the defendant's initials?

25 A Yes, I did and others did as well. Keith said that it

Salzman - Direct - Hajjar

1622

1 shouldn't matter. It wouldn't make a difference that it
2 doesn't -- that nobody would know, and that we were being
3 like just making problems or focusing on being negative, you
4 know, about things that weren't really an issue. He didn't
5 want to change it. He wanted it to be this way, and
6 insisted, it would not be a problem, even though a number of
7 us did think it was a concern.

8 Q At some point were you told about an additional tattoo
9 that would be made to the brand?

10 A I was, yes.

11 Q Can you explain that?

12 A My understanding was that the tattoo was to be -- so
13 the brand is a scar. The -- and that the tattoo would go
14 over the scar so it would be -- the initials would be
15 retattooed over the scar, but then there would be additional
16 parts of the tattoo. Like Keith had an idea that he wanted
17 to have some kind of a nicer -- pretty design, but that it
18 would have in it a special symbol of the lineage. So
19 everybody who was under me in line, each of the eight DOS
20 masters were considered a lineage. So each one would have
21 their own unique special symbol that everybody in that line
22 would have. There would be a special symbol, I think
23 between the master and slave. So the girls that I enrolled
24 would have a special symbol that they shared just with me.
25 And then each of them would have a special symbol that they

Salzman - Direct - Hajjar

1623

1 shared just with the girls that they enrolled. Our number
2 of enrollment was part of that and there may have been other
3 things that I can't recall possibly having to do with what
4 area you were from or something. But I'm not a hundred
5 percent sure about that.

6 Q Did you, in fact, get a tattoo over your brand?

7 A No.

8 Q Why not?

9 A Because Keith never decided on the design.

10 Q You testified, Ms. Salzman, about meetings that you had
11 with the first-line masters in DOS?

12 A Yes.

13 Q Where were those meetings held?

14 A Initially they were held at -- at different people's
15 homes. Usually the homes that were least likely to have
16 people notice that we were having meetings there and where
17 we could take our naked pictures and nobody would know that
18 we were doing that. But then later we bought a home.
19 Rosa Laura bought it, that was the sorority house. It was
20 on 9 Milltowne Drive in Halfmoon, and that was where we had
21 all our meetings after that.

22 Q When the defendant was present at these meetings, were
23 they recorded?

24 A Yes, generally.

25 Q Who recorded them?

Salzman - Direct - Hajjar

1624

1 A Mostly Loreta, but if she wasn't present, somebody else
2 would.

3 Q Loreta Garza?

4 A Yes.

5 Q Later did you access a drive with recordings of these
6 meetings?

7 A Yeah, Loreta's drive.

8 Q Can you explain that to the jury?

9 A There was -- she had a video that I needed to get off
10 of her drive, and so I just saw that there were a number of
11 things cataloged on the drive. Loreta was historian in
12 NXIVM for a while and she was very good at technology and
13 organizing information, and so I believe that drive was like
14 the repository of where all the information was.

15 Q Did you have those recordings yourself?

16 A I had access to recordings of the book, not all the
17 recordings. The purpose of the recordings for the book was
18 that he had given -- we called them downloads, but like an
19 explanation of the concepts that were recorded and then
20 those recordings were transcribed and that transcription was
21 edited and it was becoming a book. So I was given access to
22 the initial downloads, the initial recordings to be able to
23 go listen to them, to clarify concepts in the book that I
24 was editing.

25 Q You mentioned naked photographs you were required to

Salzman - Direct - Hajjar

1625

1 take at DOS meetings?

2 A Yes.

3 Q Did the defendant impose requirements about what the
4 photographs should look like?

5 A Yes. Well, generally, I mean, we were supposed to be
6 uniform, so like all looking the same. So one time, like,
7 Daniella had a baseball cap and we got feedback that either
8 we all had to wear hats or nobody had to wear hats. Nobody
9 should wear hats. So we were to be uniform, fully frontally
10 naked, the brand should show, and we should appear happy in
11 the pictures. Like if we weren't happy, we got feedback
12 that we weren't happy and we needed to retake the picture.

13 Q When you got feedback, who gave you the feedback?

14 A Keith.

15 Q Were the photographs sent to the defendant?

16 A Yes.

17 Q Who sent the photographs to the defendant?

18 A Whoever took the pictures, I mean.

19 Q Did he respond?

20 A Sometimes. Not always.

21 Q When the defendant gave feedback on the photographs,
22 would you sometimes have to retake the photographs?

23 A Yes. Whenever there was feedback given on the
24 photographs, we incorporated the feedback and retook the
25 picture with the feedback incorporated.

Salzman - Direct - Hajjar

1626

1 Q What does that mean, when you incorporated the
2 feedback?

3 A We made a change that was suggested. If we didn't look
4 happy, we did a picture that was happier. If our legs
5 weren't spread enough, we had to spread our legs more.
6 Whatever the feedback was, we did it.

7 Q Did the defendant request explicit sexual photographs
8 from you and the other first-line DOS masters?

9 A Yes.

10 Q How often?

11 A Sometimes -- I mean, from time to time, but it was
12 enough that everyone knew that he preferred those types of
13 pictures. And so generally our focus -- a lot -- generally
14 we would tend to just take that picture at the onset like
15 because it was viewed as preferable to him that we took a
16 picture with our legs spread or up close vaginal pictures,
17 that he liked that better and everybody in the group knew it
18 enough that we would focus the pictures on that.

19 Q Did the defendant ever give you or the other first-line
20 DOS masters feedback with regard to grooming of pubic hair?

21 A Yes. He wanted to know -- he looked at a picture
22 specifically of my vagina and said -- wanted to know why it
23 looked groomed.

24 Q Were you aware based on your prior sexual relationship
25 with the defendant of his preference in that regard?

Salzman - Direct - Hajjar

1627

1 A Yes.

2 Q How did you feel about the photographs?

3 A I had mixed feelings about the photographs. I mean,
4 for me it was very uncomfortable. Like the elephant in the
5 room for me was that he was having sex with a lot of these
6 people and he wasn't having sex with me anymore, and so I
7 felt very insecure about that, and I would have to, like,
8 consistently set that aside to be able to do what was being
9 done. And I would tell myself that it wasn't sexual because
10 it was Keith's, and the reason that we were doing this was
11 just so that we would learn to become comfortable with our
12 bodies and that, you know. It was just about vulnerability.
13 But I knew he liked certain things, and he was asking for
14 those things and he was asking for those things from people
15 he was having sexual relationships with, and as he had --
16 and when he had taken pictures of me when we were having a
17 sexual relationship. So it was hard to keep that part of it
18 out of it.

19 But I wanted to believe that that wasn't part of
20 it. And then at the same time, I went -- some of my best
21 friends in my whole life, and we're, you know, taking naked
22 pictures three times a week, eventually you get very
23 comfortable with everybody, you know, and I tried to make
24 jokes or make it fun or try to think of like fun themes that
25 we could do, like, to take the pictures which made it easier

Salzman - Direct - Hajjar

1628

1 for me to do it and to feel okay doing it. And it made it
2 more comfortable between all of us. But it was really
3 difficult, and I didn't want to be doing it.

4 Q What was the effect on you of the requirement to look
5 happy in the photographs?

6 A Well, it was just fortified that we should always --
7 like if we weren't happy with some of the things that we
8 were doing -- and this was true of anything, it wasn't just
9 this. That it was -- that we had some issue and it was
10 indicative of our issue, that we could choose to be joyful
11 at any moment. And if we didn't have -- if we weren't
12 choosing issues as the highest priority, then we would just
13 be joyful with anything that we were doing.

14 So the photographs specifically for the reasons I
15 just described were especially difficult. So then I was
16 there pretending that I was happy taking sexual pictures
17 with the people he was preferring to have sex with instead
18 of me, and that -- it was -- sometimes it was very
19 difficult. Like I tried to make it fun, and sometimes it
20 was fun and I could have fun doing it. But a lot of times,
21 it was just very painful and hard to put on a happy face for
22 that.

23 Q You testified that you provided collateral to join DOS?

24 A Yes.

25 Q At some point were you required to submit additional

Salzman - Direct - Hajjar

1629

1 collateral?

2 A Yes.

3 Q Can explain that to the jury?

4 A Well, initially, I -- I provided -- I was told that I
5 need to provide something that would be, like, so
6 significant that I would, like, rather die than share this
7 information. So I provided the account of -- of an actual
8 crime that I had been a party to and that implicated my
9 parents, Keith, and a number of my friends. And I was --
10 that collateral was rejected, and so then I was asked to
11 provide naked pictures instead.

12 Q And some time after that, after you had joined DOS,
13 were you required to commit collateral on a monthly basis?

14 A Yes. I was -- so after I -- I said I wanted to join,
15 the idea was that you collateralized all areas of your life.
16 So I had, you know, promised to -- all my material
17 possessions, all my finances, you know, all of that. And
18 then Keith said -- came to a meeting or asked at the meeting
19 why we weren't submitting monthly collateral, as if it had
20 been a thing? And I guess it had been before I came, but I
21 was unaware of it, and I learned that we were supposed to be
22 submitting monthly collateral. He said that the idea of it
23 and the importance of it was to keep the collateral current.

24 So like if I -- and I think he gave an example of
25 a car. I don't recall specifically, but like my impression

Salzman - Direct - Hajjar

1630

1 coming away from that was like that if I had a Toyota or
2 something now, maybe I'm not as successful in my life now or
3 that Toyota is not going to be as valuable to me in ten
4 years and maybe even in ten years I could afford a Mercedes
5 or something. So the Toyota wouldn't have the same hold on
6 me and ensure my secrecy and commitment. So we always had
7 to keep the collateral current so that it would always have
8 that influence, that effect that we would be unwilling to go
9 against our commitment or -- our commitment of staying
10 forever and being in total obedience and secrecy.

11 Q Did you submit monthly collateral?

12 A I did, yes.

13 Q What were some of the things you submitted as monthly
14 collateral?

15 A I mean, we were taking naked pictures, up close vagina
16 pictures three times a week. So I was told that wasn't
17 consider collateral, but to me that was very weighty
18 collateral because it was not something I would ever want
19 anybody to see and there was a lot of it. But then I
20 started promising more material possessions and things, but
21 we were running out of what to do, and so we were asking
22 each other and asking Keith for ideas of what you could do
23 and when everything is already collateralized and he had
24 suggested at one point like that, you know, we could get
25 creative and he shared -- he said you could even stage

Salzman - Direct - Hajjar

1631

1 crimes. He told me a story of somebody who had staged a
2 break-in to make it look like they had, like, broken into
3 Clare's house and taken something which she wasn't home, but
4 really the whole thing was a sham. But it was this idea
5 that we could have things like criminally -- you know,
6 implications, criminal implications to our collateral.

7 Q So the defendant suggested that there would be videos
8 of these staged crimes?

9 A Yes.

10 Q And those videos were collateral?

11 A Yes.

12 Q Did the defendant express interest in a house that was
13 specific to DOS?

14 A Yes. He wanted us to get a house for the -- a sorority
15 house.

16 Q Did he say anything about where it should be within --
17 what?

18 A My belief was that it should be in walking distance.
19 He wanted -- my understanding from the group, and they were
20 looking for a house before I even joined, was that it needed
21 to be in walking distance.

22 Q Did a house -- did someone purchase a house for this
23 purpose?

24 A Yes. Rosa Laura purchased the house that was in
25 walking distance right behind the development where he was

Salzman - Direct - Hajjar

1632

1 living and we could walk there.

2 Q Do you know who purchased the house and who paid for
3 it?

4 A I think Rosa Laura did. I mean, I haven't seen
5 documents about it, but that was my understanding, that she
6 purchased it and paid for it and put it in a trust. And
7 that we -- we the eight first-line DOS masters were
8 accountable for the expenses of it. So we paid monthly to
9 cover the mortgage and Internet, electricity, all those
10 things.

11 Q Did you start meeting at that house afterwards?

12 A We did.

13 Q Okay. I want to show you what's in evidence as
14 Government's Exhibit 126 and 127.

15 Do you recognize this exhibit?

16 A (No audible response.)

17 Q Do you recognize this photograph, Ms. Salzman?

18 THE COURT: Hold on.

19 A Nothing came up on the screen.

20 THE COURT: I'm sorry. Is this just for the
21 witness?

22 MS. HAJJAR: No, Your Honor, it's in evidence.

23 THE COURT: Okay. Go ahead.

24 A Yes.

25 BY MS. HAJJAR:

Salzman - Direct - Hajjar

1633

1 Q Do you recognize this?

2 A Yes. I believe that's 9 Millhouse Drive, which is
3 the -- or Milltowne, which was the sorority house.

4 Q This depicts the sorority house?

5 A Yes.

6 Q And this photograph?

7 A Same.

8 MS. HAJJAR: May I have just one minute,
9 Your Honor?

10 THE COURT: Sure.

11 (Pause in proceedings.)

12 Q Ms. Salzman, I'm going to show you what's in evidence
13 as Government's Exhibit 851.

14 MS. HAJJAR: I'm sorry, Your Honor. One moment.
15 (Pause in proceedings.)

16 BY MS. HAJJAR:

17 Q I'm showing you what's in evidence as
18 Government's Exhibit 853. Have you ever seen the document
19 before?

20 A No.

21 Q Do you recognize this address?

22 A Yes, 9 Milltowne Drive in Waterford.

23 Q Was this an address that was associated with the DOS
24 house?

25 A Yes.

Salzman - Direct - Hajjar

1634

1 Q Do you recognize that name, Alex Martin?

2 A No.

3 Q Do you recognize this name, Danielle Padilla?

4 A Yes.

5 Q Ms. Salzman, were there penitences or punishments in
6 DOS?

7 A Yes, there were.

8 Q Can you explain that to the jury?

9 A So penitence was a concept that we learned in the NXIVM
10 curriculum, and it was the idea of taking on something
11 painful or difficult to remind yourself of the importance
12 and to build continuous self-awareness, in essence, of the
13 importance of various things, whatever the important value
14 was that you were seeking to uphold or actualize. And some
15 of the penitences would be in line with, let's say, you
16 were -- you know, mindless or late a lot, you might take a
17 penitence of doing some sort of like a 15-minute reality
18 check, just 15 minutes, just come, be conscious of where you
19 are, what your time frame is, and build awareness so you
20 would stop being late. But also maybe that you were late
21 and took on a penitence like taking a cold shower, for
22 example, standing barefoot in the snow, that would be so
23 uncomfortable that you would think twice before ever being
24 late again.

25 So when I joined the sorority, they had shared

Salzman - Direct - Hajjar

1635

1 with me that some of the penitence they had been doing was
2 for failure like waking up in the middle of the night and do
3 burpees. But when we failed a readiness, they had been
4 taking paddlings. So we were to paddle each other with a
5 piece -- a leather strap, you know, naked butt for our
6 readiness failures that we were doing.

7 (Continued on the next page.)

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L. Salzman - direct - Hajjar

1636

1 BY MS. HAJJAR:

2 Q Did there come a time where the defendant discussed
3 paddling with you?

4 A He called in to a meeting where we were paddling each
5 other for our failures and we were taking penances for the
6 readiness failures but then it became any item on our minute
7 list with any of our projects or any of the things that we had
8 committed to do that we were failing at we were taking
9 paddling for, so we would take our naked picture and then
10 everybody would take the number of whips that you -- that was
11 commensurate with your failures and he called in and wanted to
12 make sure that we were flicking our wrist hard enough or if
13 you flick your wrist a specific way or if you really get the
14 wrist into it, then it should really hurt and that's what the
15 paddling should be, it should be something that really hurts.

16 Q Were taking penances or punishments optional in DOS?

17 A No, because he -- I mean he was -- we're doing a vow of
18 obedience and he's saying what are you going to do to fix it
19 and you were required to fix it.

20 Q And were some of these ways including paddling ways to
21 fix it?

22 A Yeah, it was viewed as a way to fix it, to make sure it
23 never happens again; if you get hit hard enough, you start
24 thinking twice about screwing up readiness, not staying up all
25 night if you needed to get something done or whatever the

L. Salzman - direct - Hajjar

1637

1 thing was.

2 Q Did you come to learn that the first line had been
3 paddled by the defendant?

4 A Daniella told me she had -- she told me that she had been
5 paddled by him and it was so painful and it was something I
6 hoped to never happen to me, it didn't sound like anything I
7 ever wanted.

8 Q And this is Daniella Padilla?

9 A Yeah. I was concerned about it.

10 Q Did Daniella Padilla tell you about another punishment
11 the defendant gave her?

12 A She told me that she was in a prideful state and that he
13 was trying to help her break the state and she had been on the
14 floor and that he kicked her and that was also something that
15 I never wanted to be in the situation. These things started
16 to become scary for me. I was concerned about failing.

17 Q And when you say "prideful state," what does that mean,
18 what do you understand that to mean?

19 A Not being vulnerable, not being willing to acknowledge
20 failures or wrong -- like that she had failed or that she was
21 wrong, that instead she was trying to be right or be arrogant
22 and not be humble.

23 Q You testified, Ms. Salzman, about a dungeon in the
24 context of DOS?

25 A Yes.

L. Salzman - direct - Hajjar

1638

1 Q Did the defendant tell you about a dungeon?

2 A Yes, and Daniella as well, that they were making a
3 dungeon in the basement and he spoke specifically about a
4 cage, that there would be a cage and he said it was for the
5 people who were the most committed to growth, they could go
6 and get locked in the cage and my understanding of it was it
7 was a type of surrendering, that to go in and to get locked in
8 and to not know when whoever was in charge of it was going to
9 let you out which also was something that I didn't want to do,
10 that was scary and that I was concerned that I would have to
11 do to demonstrate that I was one of the people who was
12 committed to growth or that it would become something that we
13 were taking on like as a penance for something.

14 Q You say the basement?

15 A Yes.

16 Q Where is the basement?

17 A Of 9 Milltowne Drive, of the sorority house.

18 Q What did you picture the dungeon to contain, what did you
19 understand it to have?

20 A Well, Daniella tell me at one point that she had ordered
21 a bunch of things for it and all the things that she described
22 were like BDSM sex torture things.

23 Q Like what?

24 A Like handcuffs, she described the cage, nipple clamps.

25 She talked about one thing that -- I didn't understand the

L. Salzman - direct - Hajjar

1639

1 concept specifically -- but like tied your wrists and ankles
2 and had some kind of net or something, I don't -- you know,
3 all things that were sexual in nature.

4 Q Did Daniella Padilla in fact order items for the dungeon?

5 A She told me she did order them and that the weekend that
6 everything about DOS became public she told me that she had
7 ordered the things and she was going to cancel the order so it
8 didn't become public that we had a dungeon or we were having
9 the dungeon.

10 Q Did you have a conversation with the defendant about what
11 would happen if you went in the cage or did you express to the
12 defendant a concern?

13 A It wasn't specifically about what would happen much
14 beyond it was you were just in there until they let you out
15 but what I -- you know, you would just be in there
16 surrendering, it could be, you know, ten minutes, it could be
17 an hour, it could be days, like you didn't know how long it
18 would be and that was the whole point of surrender but what I
19 imagined was like being in there and having to go to the
20 bathroom or something and then having to go through like that
21 type of a humiliation which I think was the point of
22 surrender, being willing to go through things that were
23 vulnerable or humiliating or being willing to go through
24 whatever as an experience of complete surrender and so that's
25 what I imagined and, you know, obviously not the kind of thing

L. Salzman - direct - Hajjar

1640

1 you're hoping to experience. I wasn't. I wasn't hoping to
2 experience that. It wasn't something I wanted to do. And the
3 fact that it was being linked with growth, like the most
4 committed people to growth, so it became like if I didn't want
5 to do it, then I was one of those people that wasn't committed
6 to growth and that was a very hard thing to get my mind around
7 and I didn't believe that you couldn't be most committed to
8 growth unless you were willing to do BDSM things.

9 Q You testified about the game as well, the game as a
10 concept in DOS?

11 A Yes.

12 Q Can you explain what that was?

13 A I wasn't as involved in the game as -- I worked on the
14 book so the game was a different project but my understanding
15 was that the game had different objectives. One of the
16 objectives was like a screening process to find people who
17 would be -- who would want to have a lifetime vow of
18 obedience, that most people wouldn't want to have that but the
19 game would be a filtering system to find the people who would
20 want that but there might be other people who would want to be
21 involved in the group to lesser degrees and so they could play
22 at whatever level they wanted to play at but also it was a way
23 of getting a lot of information -- personal and private
24 information about people, as many people as possible was my
25 understanding because we wanted to recruit as many people as

L. Salzman - direct - Hajjar

1641

1 possible but it would start out like a simple thing that I
2 could just say to you at a party or a bar or something like,
3 do you want to play a game, and then it would start out just
4 really simple like, you know, it could be something like I
5 dare you to do something and then you would do it and you
6 would get something for that. So, it was a progressive thing,
7 the more you gave, the more you got and you could go up
8 different levels.

9 Q You say it was intended as a screening process for DOS,
10 can you explain how that worked?

11 A The people who wanted to go up the levels very quickly
12 and were on board for all of those levels would be the kind of
13 person who could be presented with the concept of this
14 lifetime vow of obedience to a master and would want that.
15 You could more quickly identify what kind of person would want
16 that based on how they were responding and what they were
17 willing to do in the game.

18 Q You testified about the DOS book and your efforts with
19 the DOS book; can you explain what that was?

20 A The book was, as I understood it, was the philosophy of
21 the concepts of why have a master, why be a slave, like what
22 are the benefits of doing that, why have a sorority or a group
23 all collateralized, you know, with each other -- with their
24 masters and with each other, why -- what it meant that you
25 were making this commitment to serve a master and ultimately

L. Salzman - direct - Hajjar

1642

1 like that your master was supposed to your highest priority
2 and that your main job as a slave was to always be thinking
3 about them and thinking about how to move their life forward
4 and that should be the highest priority always above all other
5 things.

6 Q Who created the context of the DOS program?

7 A Keith created it.

8 Q How did it become the actual DOS book, can you describe
9 that process?

10 A Well, before I was in the sorority he gave the ideas for
11 it, so he would go to the meetings and share what the concepts
12 were and they would be recorded and then those recordings were
13 transcribed, I'm not sure by who but I assume the first line,
14 and then those transcriptions were edited to make a book and
15 when I came in Nicky and Rosa Laura most particularly were
16 working on editing the book and Keith asked if I would help
17 edit the book.

18 Q Did you hear the original recordings in the process of
19 editing the book?

20 A Some of them.

21 Q At what point would you consult the original recordings?

22 A When something that was written didn't make sense to me,
23 to hear how Keith said it gave me an understanding of what he
24 was talking about.

25 Q So, for each -- did the book comprise chapters?

L. Salzman - direct - Hajjar

1643

1 A Yes.

2 Q For each of those chapters were the original contents in
3 a recording that you could listen to of the defendant's voice?

4 A Yes.

5 Q Did the defendant ever tell you what his plans were for
6 the DOS book, what he intended for it?

7 A I think he wanted it to be like a -- like what was -- he
8 compared it to some of the other things that existed in like
9 the field of like yoga, so it could be something like that,
10 like understanding how to have a relationship with your guru
11 or, you know, those type of yoga practices but the book would
12 be very pretty and it would outline the philosophy, people
13 could go and they could study the book but the book was
14 supposed to be secret and that he had envisioned that it would
15 be kept in like a secret location and that people could go but
16 they would have to be like basically checked that they
17 wouldn't record anything, they wouldn't copy it, they wouldn't
18 take any pictures of it, you know, like screens to be able to
19 go in and that the book could be like maybe chained to the
20 wall or something, it would be secure so they couldn't take
21 it, they couldn't copy it, there would be no evidence of it
22 but they could go to these places and they could study this
23 book.

24 Q Where would the -- did you have an understanding of where
25 the book would physically be?

L. Salzman - direct - Hajjar

1644

1 A We talked about the idea of getting bigger and having
2 different areas that would have chapters of the sorority, that
3 each chapter might have a book.

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

6 THE COURT: Yes.

7 Q Ms. Salzman, I'm showing you what's marked for
8 identification as Government Exhibit 1403.

9 Do you recognize this exhibit?

10 A Yes, I do.

11 Q What is it?

12 A It's an email that I sent to Keith of edits that I made
13 in Chapter 1 of the book for his review.

14 Q Showing you what's marked for identification as
15 Government Exhibit 426.

16 Do you recognize this exhibit?

17 A Yes, I do.

18 Q What is it?

19 A Keith sent back his comments about my edits, he edited it
20 a little to show me the right path to be on and then this
21 email is me forwarding his comments to Nicki and Rosa Laura.

22 Q I'm showing you what's been marked for identification as
23 Government Exhibit 427.

24 Do you recognize this exhibit?

25 A That's the email that Keith sent back to me with his

L. Salzman - direct - Hajjar

1645

1 edits.

2 Q Did each of these emails have attachments?

3 A Yeah, they had Chapter 1 edited, my edits and then his
4 edits and then that forwarded on.

5 Q I'm showing you what's marked for identification as
6 Government Exhibit 1404.

7 Do you recognize this exhibit?

8 A That's the book.

9 MS. HAJJAR: Your Honor, the government offers
10 Government Exhibits 1403, 426, 427 and 1404.

11 MR. AGNIFILO: Can I have a second to talk to the
12 prosecutor? There's two exhibits that are the same.

13 THE COURT: You want to talk to the prosecutor?

14 MR. AGNIFILO: Yes, yes.

15 THE COURT: Go ahead.

16 (Pause while counsel confer.)

17 MR. AGNIFILO: The mystery has been solved. No
18 objection.

19 THE COURT: All right. Government Exhibits 1403,
20 426, 427 and 1404 are received in evidence.

21 (Government's Exhibits 1403, 426, 427, 1404 so
22 marked in evidence.)

23 MS. HAJJAR: Thank you, Your Honor. May I publish
24 them?

25 THE COURT: Yes, you may.

L. Salzman - direct - Hajjar

1646

1 Q So, first showing you Government Exhibit 1403, who sent
2 this email?

3 A I did.

4 Q And when was it sent?

5 A On February 9th, 2017.

6 Q What's the subject of the email?

7 A Chapter 1, Word-By-Word, LS edit 4.

8 Q And is there an attachment to this email?

9 A Yes.

10 Q Can you read the text of the email please?

11 A M -- which stands for master -- M, please find my
12 stripped down version of Chapter 1, the word by word section.
13 Please let me know if you think I am in the ballpark. Thank
14 you, L.

15 Q Why are certain -- why did you capitalize the "Y" in You?

16 A Because we capitalized all pronouns referring to our
17 master.

18 Q And your master was the defendant?

19 A Correct.

20 Q Showing you the subsequent pages, what is this, what is
21 the attachment to this email?

22 A This is Chapter 1 of the book.

23 Q I'm showing you Government Exhibit 426 -- 427.

24 Who sent this email?

25 A Keith sent it back to me.

L. Salzman - direct - Hajjar

1647

1 Q What date?

2 A February 10th, 2017.

3 Q And what is the text of this email back to you?

4 A What is the text, he said that he edited it a little, he
5 edited my edits a little but that I'm on the right path he
6 thinks.

7 Q And looking at the attachment, can you explain the edited
8 text here?

9 A He took out some words, added some words and what -- his
10 edits are highlighted to give me an idea of how to carry that
11 type of editing forward through the rest of the book.

12 Q And showing you what's in evidence as Government
13 Exhibit 426.

14 A This is an email that I sent to Nicki and Rosa Laura
15 February 10, 2017 saying: Here's what I sent him and some
16 comments he sent back. Let's discuss.

17 Q What do you forward?

18 A His edited version.

19 Q When you say, "what I sent --

20 MR. AGNIFILO: I think our monitors are dark. I
21 think the government's monitors are dark too.

22 THE COURT: We'll get it fixed.

23 MR. AGNIFILO: Thank you, Judge. I apologize.

24 THE COURT: That's all right. Thanks for letting me
25 know.

L. Salzman - direct - Hajjar

1648

1 Q And when you say, "what I sent him," who were you
2 referring to?

3 A Keith and it's capitalized because he's our master, he
4 and him.

5 MS. HAJJAR: Your Honor, may we activate the
6 PowerPoint?

7 THE COURT: Sure.

8 (Pause.)

9 THE COURT: You're not picking it up, are you?

10 MR. AGNIFILO: Not yet, Judge.

11 THE COURT: This is in evidence?

12 MS. HAJJAR: Yes, it's in evidence as Government
13 Exhibit 1404.

14 THE COURT: Okay.

15 Q Do you see that, Ms. Salzman?

16 A I do, yes.

17 Q And remind us what Government Exhibit 1404 is?

18 A It's Chapter 1 of the book.

19 Q Can you read the first text that appears under
20 Furtherance, Honor and Gratitude?

21 A Your sole highest desire must be to further your master
22 from whom all good things come and are related. You must
23 honor and hold your master and lineage above all others in
24 every way.

25 Q And can you explain how these chapters were broken up;

L. Salzman - direct - Hajjar

1649

1 what does it mean to be -- the lesson 1, Understanding
2 Word-By-Word, what does that mean?

3 A Each of the words in that sentence were defined so that
4 we would totally understand the meaning of the sentence and it
5 couldn't be misconstrued or misinterpreted in any way.

6 Q Can you read the highlighted text, Ms. Salzman?

7 A I believe something must be so, I allow for no excuses.
8 It is the ultimate foundation.

9 Q Was this concept, the concept of no excuse in DOS, a
10 common one?

11 A Yes.

12 Q Can you explain that?

13 A Well, the concept came -- I mean came first from I think
14 SOP, the men's curriculum, and possibly also Jness, the
15 women's curriculum within our NXIVM umbrella but the idea was
16 in any circumstance because of the way that men are brought UP
17 and raised they have life experiences and certain cause and
18 effect -- a relationship to cause and effect that women don't
19 have and so that in any circumstance men have two options,
20 they can either do the thing that's required or take a
21 consequence for it but that women because of the way that we
22 are raised and coddled by society and by men in particular, we
23 have a third option, we can do the thing, take the consequence
24 or victimize ourselves, make an excuse and get off the hook and
25 so this idea that women need to get rid of the third excuse

L. Salzman - direct - Hajjar

1650

1 was something that was -- we had already been spending time
2 interacting with in -- within our community and curriculums.
3 So then the idea that we wanted to become these women who were
4 self-reliant and who were willing to be able to do what it
5 took to be responsible, participating, contributing members of
6 society that the men in our lives felt they could depend on
7 and count on and respect, we wanted that and so the idea of no
8 excuses was like get rid of that third option and learn to do
9 whatever it takes to show up and do the job.

10 Q Do you have a view on that concept now?

11 A Well, it started to become problematic when there were
12 things that were valid concerns that were being raised and
13 then we were told it was us making excuses and so things that
14 were valid and of concern were turned back around and we were
15 told it was our issue, you know, and that this is -- we're
16 just being women, you know, and largely -- I mean in part
17 there was this idea that we were having some kind of
18 democratic process but the truth was if we had objections to
19 different viewpoints, it was always because we were being
20 women or we were having issues because men wouldn't have
21 objections, they would just do it but that's not a democratic
22 process and so that became difficult.

23 Q Turning to paragraph 10 in the book, can you read the
24 highlighted portion?

25 A Seeing how I can't move the object is blame. It's what

L. Salzman - direct - Hajjar

1651

1 we do internally with excuses. Women in particular are
2 miraculous excuse finders. Why? Because it works. If a
3 woman goes out in public and there's some sort of problem, she
4 needs a bag carried or something terrible is happening, she
5 has more options in our western culture to find excuses than
6 men do.

7 And then -- continue?

8 If you find you cannot do something or you can't do
9 something, that's not an excuse not to do it. Saying you
10 can't do something is an immediate denial of potency. That is
11 a practice you want to not do. You want to practice the
12 opposite. You want to ask how can I do things in a way that I
13 didn't think I could do?

14 Q And the phrase "women in particular are miraculous excuse
15 finders," is that the same concept you were alluding to
16 previously?

17 A Yes.

18 Q This is under the chapters -- the paragraphs with numbers
19 11, 12 and 13; can you read the highlighted portion?

20 A The most important lineage is, if you will, your slaves,
21 your slaves's slaves, etc, and your master, your master's
22 master, your master's master's master all the way up like
23 that. They would say what would my master's master's master
24 say. So, actually -- it is actually importing what your
25 master and the lineage would say into all of your decisions,

L. Salzman - direct - Hajjar

1652

1 it's holding them above. Well, actually everyone is related,
2 everyone is in my lineage. I could extend my lineage to every
3 single person. So I don't have to hold anyone above anyone
4 else. Everyone is equal, everyone is perfect, everyone is the
5 same, we're all new age. Let's eat some crystals and all be
6 happy. But that's not what this is saying, there are people
7 who are in your lineage and directly of your concern and
8 people that are not. People of the lineage and that lineage
9 just like the master becomes internalized and you hold that
10 above all others.

11 Q What is lineage in DOS, what does that mean?

12 A Lineage is -- so, there are eight lines for the eight
13 first line masters and anybody we enrolled under us. So,
14 Keith at the top, then me, the women I enrolled, the women
15 they enrolled, the women they enrolled, that makes one
16 lineage. So, there are eight of them.

17 Q And the phrase, "What would my master's master's master
18 say," for everyone in DOS who is that person?

19 A Ultimately all the way up is Keith is the master's
20 master's master's master.

21 Q So, these practices that come after the -- there are
22 lessons and there are practices beneath it, what are the
23 practices?

24 A There were suggestions of something that you could do to
25 build your internalized experiential understanding of the

L. Salzman - direct - Hajjar

1653

1 concept that was presented in -- the philosophical and
2 theoretical concept that was illustrated in the chapter. Then
3 there was a practice you could do so it could become practical
4 and you could learn to be that and live that.

5 Q Can you read that second practice please?

6 A Contemplate why your master is better than all other
7 people, why they should be held above all others.

8 Q And was that put into practice in DOS, the concept of
9 your master being better than all other people?

10 A Yes.

11 Q So, this is under Lesson 10, What Does Master Mean, can
12 you read the highlighted portion?

13 A It is a conscience of fear, it is not the highest but
14 ultimately they should be able to make a vow and it should be
15 so distasteful to break the vow that they'd rather die than
16 break their vow and that's a vow for everything. This is very
17 physical manifestation of the vow with the brand, with all of
18 this stuff that might really be the first and only thing that
19 represents a forever until your last breath collateralized and
20 on an ongoing basis more collateral is put into this thing so
21 we have an example to build all other things from.

22 Q What is this describing?

23 A It's describing that your collateral should be so
24 distasteful that you would rather die than break your promise
25 and that initially you're going to have this conscience,

L. Salzman - direct - Hajjar

1654

1 you're going to be so afraid that your collateral might be
2 released that you will build a conscience about it, that
3 you'll remember not to break it because you couldn't live with
4 yourself if you did, you couldn't live with the consequences
5 of that because it is so scary.

6 Q So, the practice under Lesson 10: Do one act of
7 self-denial every day in honor of your master.

8 The act of self-denial, are those the self-denial
9 acts you described earlier?

10 A Yes.

11 Q So, under Lesson 16: Nature of Commitment, Nature of the
12 Vow. What's the underlying principle, vision, motivation of
13 the whole thing, what's the nature of the commitment.

14 Can you read the highlighted portion please?

15 A That's why the master-slave relationship works so well,
16 you submit, you surrender yourself to a master but it's the
17 deeper principle that is symbolized through that person. This
18 vow is more than that. When you make a vow to your master or
19 when someone makes a vow to you, this is the deepest vow you
20 can do, maybe as close a vow as being in the military where if
21 you try to go AWOL they kill you which happens but even that,
22 if you are a soldier out on war and you tried to escape and
23 they kill you, that death is not necessarily as harsh a
24 collateral as what we ask as collateral because people should
25 say death isn't even a way out, it's how strong this

L. Salzman - direct - Hajjar

1655

1 commitment is -- that's how strong this commitment is.

2 Q And did you consider your commitment to be this strong,
3 as strong as described in the DOS book?

4 A Yes.

5 Q In that same section: Discipline is correction and
6 obedience to that correction; can you explain -- was
7 correction a concept in DOS?

8 A Yes.

9 Q Could you explain that?

10 A If we did something and we are given feedback that it was
11 not caring or loving or considerate or mindful, we were to fix
12 it. Anything that was pointed out should be corrected.

13 Q And underneath that: Obedience, it doesn't matter what
14 the command is, it matters that you obey. It doesn't matter
15 if you understand the command, it matters that you obey.

16 A Yes.

17 Q Was that a concept in DOS?

18 A Yes.

19 Q This highlighted text: Making excuses about it, you can
20 suffer about it, you can practice interpersonal games in a way
21 that you get around it; what is this describing?

22 A It is describing making excuses not to just obey, not to
23 stay and uphold your word to keep everything completely
24 confidential and be in this vow of obedience.

25 Q Are these the same excuses that you were describing

L. Salzman - direct - Hajjar

1656

1 earlier?

2 A Yes.

3 Q Can you read what's under Chapter 2?

4 A Your greatest joy is to surrender completely all things
5 in all ways without reservation completely exposed to your
6 master and master's will. The best slave derives the highest
7 pleasure from being her master's ultimate tool independent of
8 use. By joyously offering all your decisions to be made or
9 used by your master, you surrender your life -- my screen went
10 black -- your life, mind, body and possessions for
11 unconditional use.

12 Q Did this text under Chapter 2 have a role in the ceremony
13 involving the branding that you described earlier briefly?

14 A Yes, we specifically said that in the branding ceremony,
15 that I -- that my greatest joy is to surrender completely all
16 things in all ways, almost word for word this whole thing we
17 read; I surrender my life, mind, body and possessions for
18 unconditional use.

19 Q And this practice underneath that chapter of asking your
20 master for permission with the greatest feeling of joy,
21 challenge yourself to do that, the most valuable decisions
22 would be the ones you're most afraid they'll say no to; was
23 that also a concept in DOS?

24 A Yes, regarding like asking for permission for something
25 and you should ask permission about the stuff that you feel

L. Salzman - direct - Hajjar

1657

1 most specifically attached to, so that if they say no, you
2 know, you were willing to surrender it even if they said no.
3 That's how you know it was really particularly committed and
4 obedient and surrender, that is the hardest thing and you're
5 willing to give it up.

6 Q In Lesson 4, Without Reservation Completely Exposed, the
7 text under that reads: So completely exposed means completely
8 vulnerable without hiding anything, that there are no closets
9 that are unopened, no little boxes, nothing unexposed, truly
10 an open vessel.

11 A Yes.

12 Q What did you mean by those words, "an open vessel"?

13 A An open vessel, like totally open to be able to serve any
14 purpose or any function no matter what it is without
15 evaluating the function, without judging the function, without
16 reacting to the function, just being willing to do the
17 function.

18 Q Is that the DOS slave?

19 A Yes.

20 Q Under the practices under this chapter there's a practice
21 involving sharing deepest fears, fantasies, secrets and
22 thoughts; was that part of DOS?

23 A Yes, some parts.

24 Q Can you explain that?

25 A That practicing sharing, that is a type of rooting out of

L. Salzman - direct - Hajjar

1658

1 pride or finding areas of fear and so exposing those would in
2 theory being freeing and so that was a practice done to
3 confess something, to be vulnerable and to be willing to be
4 totally exposed to your master.

5 Q And looking back now, do you have a different view of
6 this practice of confession, of sharing deepest fears?

7 A Well, I think it -- I mean it makes you particularly
8 vulnerable, you know, in situations. It makes you specific --
9 I think specifically vulnerable and more susceptible to be
10 taken advantage of if abuses of power happen but also I
11 mean some of those things too go back to the -- a lot of the
12 things -- it didn't always have to but I think in general too
13 that also it took a sexual connotation at different times.

14 Q What do you mean?

15 A Your fantasies, like sometimes took a -- what are your --
16 like sexual fantasies component.

17 Q Okay. Lesson 8 is titled A Tool --

18 THE COURT: Can we take a break now?

19 MS. HAJJAR: Yes, Your Honor.

20 THE COURT: All right. Let's take the mid-morning
21 break.

22 All rise for the jury.

23 (Time noted: 11:30 a.m.)

24 (Jury leaves courtroom.)

25 THE COURT: All right. The witness may stand down.

L. Salzman - direct - Hajjar

1659

1 Do not discuss your testimony with anyone.

2 (Witness steps down.)

3 THE COURT: All right. We'll take a ten-minute
4 break and we'll try to fix the screens.

5 Thank you.)

6 (Recess taken.)

7

8

9 THE COURT: Bring in the witness please.

10 (Witness resumes the stand.)

11 THE COURT: Bring in the jury.

12 (Pause.)

13 (Jury enters courtroom.)

14 THE COURT: Please be seated.

15 Okay, Ms. Hajjar, you may continue your examination
16 of the witness.

17 The witness is reminded that she is still under
18 oath.

19 BY MS. HAJJAR:

20 Q Ms. Salzman, before the break we were talking about some
21 of the concepts including the concept of collateral in the DOS
22 book. Were these concepts conveyed to your DOS slaves?

23 A Yes.

24 Q Did you have occasion to ask them to read the DOS book as
25 well?

L. Salzman - direct - Hajjar

1660

1 A I read portions of it to them.

2 Q Now, before the break we were at Lesson 8, A Tool. The
3 tool doesn't have a want. The tool doesn't look at its use.
4 The tool is just a good tool. The nature of being a sharp
5 knife is to be sharp, it's not to care if it's being used as a
6 murder weapon or being used for surgery.

7 In this context, what is the tool, what does that
8 refer to?

9 A The slave is the tool.

10 Q And the moment you start to care about the use, now you
11 have your pride. To be a tool in a sense is saying no
12 excuses.

13 What does that mean in the context of DOS?

14 A It meant that whatever use your master had for you was to
15 be done joyously and if you cared about what you were being
16 asked to do or the why, it was your pride, your issues
17 interfering with your success, effectiveness at being a good
18 slave.

19 Q Were these principles just abstract or were they applied
20 every day in DOS?

21 A They were applied.

22 Q Lesson 10: Joyously offering all your decisions to be
23 made or used by your master.

24 Under Lesson 10 there are these practices; can you
25 read the practices please?

L. Salzman - direct - Hajjar

1661

1 A Spent time thinking of how you can proactively further
2 your master with the current capacities you have. Choose to
3 act on one thing that you would not have acted on otherwise.

4 And then number two is: What other capacities can
5 you build to be able to further the master more. Make a plan
6 on building those capacities and how that will further the
7 master.

8 Q Can you explain that in the context of DOS, what that
9 means?

10 A That ideally you're looking to always make your master
11 more successful, more effective, more potent in the world and
12 so you should be always looking at how to proactively be doing
13 that and if you're limited in your capacity to do that, then
14 you should make a plan of how you can become unlimited so that
15 you can further them even more.

16 Q Under the same lesson: You offer this as an opportunity
17 for your master to use you as a tool. If you see yourself as
18 a tool, the greatest door to opportunity, the greatest door
19 for you is to be the tool, for you to be the vessel.

20 Can you explain what this means?

21 A That the greatest -- that you should always be looking
22 for these opportunities for your master to be able to employ
23 you as a tool and that somehow in doing that, being like the
24 vessel or the most open to that and the most willing to do
25 that, to be the tool in any way or whatever it is and derive

L. Salzman - direct - Hajjar

1662

1 the greatest joy from that is the greatest opportunity for
2 growth in yourself.

3 Q Was a DOS slave permitted to question the motives or the
4 reasoning behind an order?

5 A No.

6 Q Lesson 11: Surrender your life, mind, body and
7 possessions for unconditional use. What goes on within my
8 body is personal to me and that too is the use of that as much
9 as I can give over I do.

10 What does that mean?

11 A It means that anything they want, your goal is to be able
12 to serve them regardless of what it is and as much as you can,
13 whatever goes on with your thoughts, your emotions, your body,
14 your capacities, your work product, whatever it is, it is just
15 all to serve them and to do that -- as much as you can do
16 that, that's the goal.

17 Q And "them" is who?

18 A The master.

19 Q Turning to Chapter 3, can you read the text at Chapter 3?

20 A The joy of obedience is far greater than the distaste of
21 any command. The harder the task required, the greater joy to
22 complete. The harder the task completed, the greater proof to
23 your master and yourself of your strength and commitment.

24 Q What does this mean?

25 A It means that ideally you should be able to build joy in

L. Salzman - direct - Hajjar

1663

1 obeying and that that joy is far greater than anything you
2 could be asked to do no matter how hard or distasteful it is,
3 the joy should be better and the fact that it is harder or
4 distasteful should make that joy more because you're proving
5 to your master and yourself that you're that committed that
6 you'd be willing to do anything, even really difficult and
7 awful or distasteful ugly things, whatever they are.

8 Q Here's some examples of requests or commands here: If
9 the master were to command you and say, at the bottom, take
10 off all your clothes, run outside and jump up and down and say
11 everyone, look at me, look at me, look at me, you would be
12 taking off your clothes already and seeking to understand
13 that, you're not worried that it's cold out, you're not
14 worried that there's a public, you're not worried that the
15 police might come, none of that is involved, that is your
16 evaluation of it.

17 A Yes.

18 Q What does that mean to you?

19 A It means that you should be doing the command before you
20 even question the command and that the objective is just to
21 seek -- to understand how to do that command best, not to
22 question why that command or any consequences of the command.

23 Q Did you convey these, the concepts expressed in the book,
24 did you convey this concept to your slaves as well?

25 A Essentially, yes. I don't know that I specifically read

L. Salzman - direct - Hajjar

1664

1 this part but, yeah, the concept of it, their job was to do
2 that.

3 Q So, under Lesson 11, Pushing Beyond Indoctrination. You
4 believe certain things are good and bad and that constrains,
5 that circumscribes your life and they're just not true.

6 What does that mean?

7 A It's a statement of our indoctrination, that like
8 basically the way we're raised we come to believe certain
9 things that are limiting, that certain things are bad which
10 may not be bad or certain things are good which may not
11 necessarily be good, getting hung up on the goodness or
12 badness of it is constraining because we should be able to
13 transcend our indoctrination because it can be limiting.

14 Q Was this a concept that was taught in NXIVM more broadly,
15 this idea of social indoctrination?

16 A Yes.

17 Q Was this a concept the defendant taught?

18 A Yes.

19 Q In this concept, the social indoctrination, that certain
20 things are good and bad, is that something you are intended to
21 get out of?

22 A I don't understand.

23 Q Is a social indoctrination a bad thing in this concept?

24 A Well, that certain aspects of social indoctrination can
25 be limiting and so to transcend that would be to evolve beyond

L. Salzman - direct - Hajjar

1665

1 those limitations.

2 Q Can you give an example?

3 A Sure. Like -- I don't know, you can think of like in any
4 social custom but let's say, for example -- well, I don't know
5 if you've ever had the experience where like as a child
6 growing up you go over to eat at somebody else's house and
7 their family does something like completely different than
8 what your family does, so it just feels kind of awkward or
9 uncomfortable, that's just like a simple example of you're
10 indoctrinated in a certain way in your family and you may find
11 as you come to grow that there are other ways to do things but
12 there may be something that like maybe your religion says is
13 bad, like getting divorced for example, you know, or your
14 culture may say that that's really bad where another culture
15 may not think that's bad; so, to realize that it is not bad in
16 itself, it serves a function, you might be able to take
17 advantage of that function where you didn't perceive it as an
18 option before. That's just like a simple neutral example.

19 Q Did the defendant in the defendant's -- as he explained
20 this concept, did it go further than that, did it go to things
21 that were assessed as good and bad?

22 A Yeah, I mean when we started getting into things more
23 along the lines of like Jness curriculum when it was first
24 introduced or SOP, then you start getting into more I guess
25 you could call them like heated subjects, like people have

L. Salzman - direct - Hajjar

1666

1 more investment around, like having monogamous relationships,
2 for example, like and in Jness then we started to introduce
3 like the concept of men being more naturally polyamorous and
4 women being more naturally monogamous, so somehow transcending
5 our -- as women, our belief that we need to own our men and
6 own the sex that they have as just as our own somehow this
7 limiting belief and that if we could come to understand their
8 more biological nature and some of the social constraints that
9 have been put on them, them being men, in general that as
10 women we would not be so fearful or controlling and we would
11 come to accept and be really grateful for the things that they
12 give us and not need to own them or put constraints on them to
13 feel secure in our relationships.

14 Q Do you have a view on that concept now?

15 A Well, I mean certainly through the curriculum it
16 legitimized the lifestyle that I think Keith wanted to live
17 and had a whole community of people who could understand that
18 and support it or even defend and protect it against criticism
19 or other consequences.

20 Q Is this the same concept, the same section, Unique
21 Experience Breaking Through Your Indoctrination, is that the
22 same social indoctrination concept you explained?

23 A Yes.

24 Q Chapter 4 is titled Quality; can you read the text under
25 Quality?

L. Salzman - direct - Hajjar

1667

1 A You must give your master your very best at all times.
2 All things done for your master must be of the highest quality
3 you can offer.

4 Q And under Chapter 5 titled Aliveness, can you read that
5 chapter?

6 A As such, a good slave actively seeks to give her master a
7 competitive advantage over all other people and in all
8 situations. Always make your master increasingly more
9 powerful, influential and capable through your actions and
10 thoughts.

11 Q And this concept, did that take -- did that have
12 practical applications in the context of DOS?

13 A Yes.

14 Q Can you explain that?

15 A Well, we were always looking to be able to uphold our
16 master, I mean in my case Keith, to help him, to edify him,
17 you know, and help others see that -- like his good
18 contributions and in essence we were -- I mean specifically in
19 DOS, I mean not just the edification, I mean tribute was very
20 prevalent and pervasive in ESP; in DOS especially we were
21 seeking to find influential people to bring in to help
22 increase the potency and the influence of the group and
23 ultimately the group's objectives which were, you know, Keith
24 was at the helm of that, they were his goals and objectives,
25 his vision for the group. And in NXIVM it was part of that

L. Salzman - direct - Hajjar

1668

1 too, having powerful and influential people. It wasn't as
2 much the objective but, you know, certainly you become more --
3 you have more capacity if you have more power and influence.

4 Q And by recruiting people of influence or power into DOS,
5 did you see that as by extension making the defendant more
6 powerful or influential?

7 A I didn't think of it that way at the time but I do think
8 that, I do think it is that.

9 Q Lesson 5 is Good Versus Bad and under that section I just
10 want to -- I'll just read this paragraph to you, a little bit
11 above that there's a highlighted phrase: The strongest bond
12 that we can have as being for the good is a new bond that's
13 created which is the vow. Criminals won't turn each other in
14 because they're scared of being killed. The reason why people
15 of the vow won't turn each other in, you can say that they are
16 scared of the collateral but it is a collateral that they put
17 up to certify that their bond is as good as any criminal bond,
18 any bad bond.

19 What's the criminal bond, what's the bad bond?

20 A The criminal bond is that if you -- it's like in -- I
21 guess you could look at like criminal organizations or mafia
22 organizations, why you don't rat on the people in the group,
23 because you get killed if you do that.

24 Q So, criminals won't turn each other in because they're
25 scared of being killed, that's the criminal bond, the bad

L. Salzman - direct - Hajjar

1669

1 bond?

2 A That's the concept, yeah. I mean it says it, right,
3 they're scared of being killed, that's the criminal bond.

4 Q So, the collateral that they put up to certify that their
5 bond is as good as any criminal bond, any bad bond; what do
6 you understand that to mean?

7 A That the collateral is as scary as that or even more
8 scary than that and we -- I mean we looked at it in the part
9 we read before, where you're supposed to see it that death is
10 not even a way out of it, so it's supposed to be stronger than
11 even the fear of being killed if you were to violate the vow,
12 that's how strong the collateral is supposed to be.

13 Q This is under Lesson 12, Powerful and Influential; if
14 you're not always making your master, the time when you're not
15 always, you're a minion for the bad, you're a minion for evil.
16 Always make your master increasingly more powerful which means
17 they're at a certain level of power, is that enough.

18 What does that mean?

19 A Well, there are some concepts that were laid out a little
20 bit before in the book that talk about that fear and comfort
21 basically are vehicles for tools of hate or for evil because
22 ultimately the reason we're being hateful is to be more
23 comfortable or we're being hateful to get things that we
24 haven't earned and so -- and that -- so, laziness, comfort,
25 fearfulness breeds hate, these are the concepts that we lay

L. Salzman - direct - Hajjar

1670

1 out in the book before this but also that we've been taught
2 within NXIVM. So, it's saying like that ideally you know that
3 you're not breeding that by always being disciplined, always
4 being vigilant, always working and so it links it up with the
5 master in this context, if you're not always making your
6 master, you know, increasingly more powerful, then you're
7 being a minion for evil because you're being lazy about it or
8 the only reason you wouldn't do it is either laziness or
9 issues, fear, so somehow that breeds evil, you know, doing
10 this is good and not doing this becomes evil.

11 (Continued on next page.)

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Salzman - Direct - Hajjar

1671

1 DIRECT EXAMINATION (Continued):

2 BY MS. HAJJAR:

3 Q Chapter 6 is titled "Creation."

4 Can you read the text under production potency and
5 power?

6 A That your master has your time and labor allows for more
7 production. That your master has your vote allows for more
8 potency. By recruiting others within your power you honor and
9 increase your master's power.

10 Q Was the concept of time and labor associated with -- as
11 to the DOS slaves, an important component of DOS?

12 A Yeah, I mean the idea that's being communicated through
13 this is that if you're putting in, let's say, 70 percent of
14 your effort towards moving something forward, in this case
15 moving the master forward. And then you take 30 percent off
16 to be lazy, you just undermined all your own efforts.

17 So it starts to talk about that it has to be full
18 time. It's a full-time commitment to be always making your
19 master more potent.

20 And it ties directly to things -- so that was
21 supposed to be the general mindset. And then there's specific
22 time dedicated to furthering the master. And labor dedicated
23 to furthering the master.

24 Q Under Lesson 2, Labor and Production. And maybe above
25 that as well.

1 If you're serving the master at 49 percent of the
2 time, you're not serving the master. It needs to be a
3 hundred percent. It certainly has to be over 51 percent
4 otherwise you're knocking yourself out, and the other half of
5 the time, when you're not severing the master, you're serving
6 other things. So the nature of this time is something you
7 really have to value.

8 Is this a concept you conveyed to your slaves as
9 well?

10 A Essentially. I don't know if I laid it out exactly like
11 that, but it's just like it says here. If you're undermining
12 your own efforts, then you're not moving forward. So you
13 should always move it forward.

14 Q Labor you might say are work. All that we do with the
15 outside world, with our bodies, our emotions, and our
16 thoughts. So most people who say, I can't do more, they're
17 not looking correctly. There are a series of excuses.

18 The master shows you where you fail, which is the
19 most important thing to increase your production, increase
20 your net results to get you out of the 30-hour a week
21 low-labor, low-wage job.

22 So that by having the outside perspective and the
23 outside person, it can help you overall do so much more for
24 the ultimate master, which is your ultimate purpose on this
25 world, which is ultimately also being forced by the defendant.

Salzman - Direct - Hajjar

1673

1 The concept of productivity and that first stages of
2 DOS was linked to slave productivity, was that something you
3 conveyed to your DOS slaves?

4 A Yes.

5 Q Can you explain that?

6 A That ideally they should be seeking to provide the most
7 value in the time and the labor that they're providing. They
8 should do the highest value of jobs, basically, and that that
9 contributes the most.

10 Q Can you give an example of that with respect to your DOS
11 slaves in terms higher capacity worked?

12 A Sure.

13 Like at one point I think I had a conversation with
14 Audrey and she relayed she often would -- would -- she'd be
15 grocery shopping so she would ask if I wanted anything or pick
16 up some groceries, while she was out. Which I would pay her
17 for the groceries but not the time she spent shopping.

18 And I conveyed to her that helping me -- or she
19 offered to do things similar to that, like personal assistant
20 work. And I communicated to her I have personal assistants,
21 who do this low lever work, you should do the highest level of
22 jobs.

23 So providing things like executive level assistance,
24 you know doing -- and then later some of my slaves helped with
25 that. Like Audrey helped do administrative type -- executive

Salzman - Direct - Hajjar

1674

1 level administrative type work for DOS, or Jimena was helping
2 with the sales process for DOS.

3 They're doing higher level, not just basic things my
4 housekeeper can do.

5 Q In terms of labor you received in the context of DOS, was
6 some of that labor qualified, like qualified in as specialized
7 profession?

8 A Yeah. I mean we reviewed legal contracts and did legal
9 research, so in that sense.

10 Q And was -- was that work in the context of a requirement
11 in DOS?

12 A Well, it was her active care. She did it as her active
13 care. So, yes.

14 Q You said that your master has your vote and allows for
15 more potency. The holy trinity of time, labor, and vote.

16 What are each these things, the time, labor, and the
17 vote in the context of DOS?

18 A Well, your time, that you're contributing your time
19 towards moving your master forward, and your efforts, your
20 labor, and services.

21 The way that vote was used was actually
22 self-referential that it was what you vote with or the way
23 that you spent your time.

24 So as we, you know, just reviewed that, if you're
25 spending, it has to be at least 51 percent of commitment or

Salzman - Direct - Hajjar

1675

1 your undermining your own efforts. You have to be voting.
2 Your vote has to be more than 50 percent for you to actually
3 be voting for moving the master forward. That was how vote
4 was used.

5 But I think there are more reliant obligations of
6 voting we talked about. We won't have influence in the world,
7 but there's way more votes for in the world and that could be
8 worthy of, you know, a shock to who you elected in office.

9 Q If you're highest value is the master, by spending your
10 moments doing things for the master, around the master, by the
11 master, makes you purposeful, makes you annealed, makes your
12 moments close to a hundred percent in a given direction highly
13 effective, and it's a gift to your master and a highly
14 effective slave.

15 That is this concept of being highly effective, a
16 good thing in DOS?

17 A Yes.

18 Q To your master?

19 A Yes.

20 Q Ms. Salzman, you testified that enrollment was a focus in
21 DOS.

22 This part of the book reads: Every person who
23 becomes a slave should make a whole list of names of all the
24 people they know, mother included, and who should be enrolled.

25 Is that enrolled in DOS?

Salzman - Direct - Hajjar

1676

1 A Yes.

2 Q The moment you recruit someone, you take your master's
3 position into your own and you become one with the master
4 because you are the master. So when you recruit someone, you
5 give your master a gift.

6 Is this gift, in the context of that sentence, a
7 reference to the DOS slave that you recruited?

8 A I didn't see it -- I hadn't seen it that way. I thought
9 it was the gift of becoming a master yourself. But, in
10 essence, that slave is their slave, too. So it is can seen in
11 that way.

12 Q So you when recruit someone, you give your master a gift.

13 How do you understand that sentence?

14 A I had understood it by becoming a master yourself. But,
15 in essence, it's a gift either way.

16 Because it makes them more potent, especially if you
17 look at they're going to give an hour towards the -- you know,
18 if my master has an objective and my hundred percent is to
19 serve that objective, any slave I have serving me is serving
20 that objective.

21 So whether they're serving my objective to serve
22 that objective, or that objective directly, it's a gift. It
23 goes to them any way.

24 Q Chapter 7 is Connection.

25 Can you read what's under secrecy?

Salzman - Direct - Hajjar

1677

1 A Always make your master look good and be powerful and
2 capable. Intelligently utilize the secrecy of your
3 relationship with your master to be a confederate and to move
4 your master forward.

5 Q What does that mean?

6 A As it was explained to me, a confederate is somebody who
7 is in on the secret but doesn't appear to be in on the secret.

8 So if you have like a magician who's performing an
9 act and gets a volunteer from the audience, oftentimes that
10 volunteer appears to be just like an audience member but
11 actually they're part of the act and it's been planned ahead
12 of time.

13 So the idea of using that in this case is two people
14 who seemingly seem unrelated but who actually have the secret
15 relationship where one of them is actively trying to move the
16 other forward, it can be used as a powerful tool because a
17 seemingly innocuous person is advocating for somebody who
18 seems unrelated to. And so sometimes that carries more worth
19 or for credibility than somebody who publicly has an
20 allegiance to that person.

21 Q Is this something that you experienced with the
22 defendant?

23 A Yes.

24 Q Can you give some examples of that?

25 A So in -- yes, in ESP, in intensives, for example, you

Salzman - Direct - Hajjar

1678

1 might have somebody who is running a mentor group, which is a
2 mentor group you would have like a specific person who is
3 there to help you and process you through your issues to
4 resolve whatever you bring to the group that you want to work
5 through. But behind the scenes, that person could be given a
6 whole bunch of information about you that you wouldn't have
7 known ahead of time.

8 So sometimes I would be sent in to mentor certain
9 people and be given information about them that they didn't
10 know that I had.

11 And in particular, before I knew about DOS, there
12 was a DOS -- someone I came to learn was a DOS slave, who I
13 was asked to mentor in the intensive, who I was told was felt
14 that breaking their commitment was freedom, and that it would
15 be good if I could be their mentor, which is an unusual thing
16 because I was a very-high level person in NXIVM. So I didn't
17 mentor very many people.

18 So I was asked to go in and mentor this person and
19 help them learn that through commitment is where you really
20 experience freedom.

21 So in that case I became a confederate, and that's
22 something I wasn't even privy to, I believed to help get them
23 to stay in DOS, and they ended up leaving.

24 Q Did the defendant task with approaching this?

25 A Mentoring them through an issue about surrounded

Salzman - Direct - Hajjar

1679

1 commitment.

2 Q And you later learned that at that time the person you
3 were tasked to approach was, in fact, a DOS slave or had been?

4 A And was -- and was deciding whether to leave DOS. And I
5 was sent in to advocate for commitment is freedom not leaving
6 the commitment is freedom.

7 Q So can you just explain how that relates to the concept
8 of being a confederate?

9 A In a sense I was advocating for their relationship with
10 Keith and with DOS without even understanding it.

11 Had I had known, I would have been a known
12 confederate, but I was an unknown confederate in that case.

13 But there -- I mean during the time of DOS, we had
14 other companies. You know, a Keith started number of
15 different companies and he began very publicly advocating for
16 Daniella Padilla very publicly.

17 And then later I came to learn -- and it was
18 questionable to me even at the time why is he advocating for
19 her so publicly? And later I became to learn her DOS was
20 going on during that time and at that time he was teaching her
21 what confederacy was.

22 Q This concept of a confederate and confederates are very
23 powerful strategically.

24 Are these the same concepts you described and
25 performed?

Salzman - Direct - Hajjar

1680

1 A Yes. Let's say, for example, like somebody would -- one
2 of my slaves would say, why don't you go talk to Lauren? She
3 would be a really good person to talk to. If you could see
4 Lauren as a client, like my slaves or their slaves' slaves
5 could even refer me business or something like that without
6 even knowing that those people are doing that specifically to
7 further my own career.

8 Q And that was part of --

9 A It could be seen that they thought, yeah, yes, it could
10 just be seen as them being -- having had a bit of experience
11 with business. And so I'm a good person to go to for that
12 business versus the secret relationship we had where they're
13 committed to actually moving my business forward.

14 Q So in this lesson through a connection there's a
15 paragraph: People of The Vow are reliable to people in The
16 Vow. If there's a vow, and you're connected to them in some
17 sort of task, you know they will execute if collateralized.
18 Their word is collateralized ultimately by whatever
19 collateral.

20 And do you know the collateral intent? How do you
21 know? Because your collateral intent? So everyone of The Vow
22 will act to a great degree reliable.

23 What does that mean?

24 A It means that you can count on the trust of the people
25 not to violate the commitment to secrecy and to the group

Salzman - Direct - Hajjar

1681

1 because their collateral is so intense and you know it's so
2 intense because your collateral is so intense, and you're
3 afraid of the consequences of breaking your vow so you
4 understand what kind of confidence you can have in them
5 because you can imagine what it must be like for them because
6 it's like that for you.

7 Q And the people here being DOS slaves?

8 A DOS slaves. You can look at any other DOS slave and know
9 how much you can trust them to stay and keep your secret to do
10 whatever because they would never leave because it's so -- it
11 would be so horrendous if they did, and you know that because
12 it would be so horrendous if you did.

13 Q Where the text reads: You know you will execute.

14 What does that mean?

15 A You know they'll come through no excuses because that
16 what they're commanded to do, that's what their vow is about.

17 Q Chapter 8 under needs: Always be attentive to your
18 master and your master's needs. Any hints to which you can
19 attend, any need you can find should be met and satisfied
20 without request or command. During everyday hour and moment,
21 you must be actively moving your master forward personally and
22 in the world.

23 Was that part of DOS as well?

24 A Yes, all of this was.

25 Q Under attentive, again, these lessons break down the

Salzman - Direct - Hajjar

1682

1 concepts in the first -- in the first part of the chapter; is
2 that right?

3 A Yes.

4 Q And under attentive, the text reads: So you focus your
5 awareness on the master. Ever see a hungry dog? Someone
6 walks in the room with food, that dog sees nothing else. That
7 is how you should be a hungry dog for your master. Your
8 master's voice, when the master's in the room. Your master's
9 object. Anything of the master that you perceive. Master
10 leaves a crumb on table, it's all about that.

11 What do you understand that to mean?

12 A That you should be always paying attention to what they
13 are, and anything they do, you should be aware of it.

14 And always looking to make it better, easier, more
15 effective, more efficient, more productive, more influential,
16 everything. They're the highest priority. Everything.

17 Q Ms. Salzman, did the defendant discuss an idea or any
18 ideas about DOS in the future, the form it would take?

19 A To a degree at times. I mean, I think he envisioned that
20 it would have, you know, thousands or, you know, a million --
21 millions of people in it. That there would be actors, you
22 know, so there would be different areas.

23 He spoke a little bit about having like an area have
24 somewhere in the neighborhood of like 300 members.

25 And there were ideas for group meetings and how to

Salzman - Direct - Hajjar

1683

1 conceal identities during group meetings. So that you could
2 maintain the secrecy and the type of silent-ism of the group,
3 but still have interaction with people who weren't part of the
4 group.

5 Q Can you describe that further in terms of concealing
6 their identity, what does that mean?

7 A Like if you're going to attend a meeting and you would
8 have a group meeting but everybody might be in masks, or you
9 might have a pseudonym, or you might -- like the first line
10 DOS members had different brands than everybody else. So that
11 those brands you might possibly cover with something that
12 looked more uniform to everyone else.

13 Q Did the defendant ever talk about effects DOS might have
14 in the larger world?

15 A Possibly that we might be able to have a candidate -- you
16 know, a DOS candidate in like a high-level political office.

17 Q The DOS candidate needs -- in a collateralized vow?

18 A Yes.

19 Q Ms. Salzman, I want to go back to discuss your initial
20 recruitment into DOS.

21 You testified that was in January 2017?

22 A Yes.

23 Q Who first approached you about DOS?

24 A Keith first approached me.

25 Q And what did he say to you?

Salzman - Direct - Hajjar

1684

1 A He said that he wanted to make our relationship closer.
2 He wanted to bring our relationship closer. And he asked me
3 what I was willing to do for my growth and for my commitment
4 to him.

5 Q What did you say?

6 A Anything. Anything. I'm fully committed to my growth
7 and fully committed to you.

8 Q What did he say?

9 A He told me that there was something that some of the
10 other girls were doing. He was not specific about who the
11 girls were and -- but that they wanted to invite me to
12 something and that they were going to be approaching me.

13 He and I had conversations over the next like 24, 36
14 hours, so I'm not sure exactly in which they took place in
15 which conversation. But we had a number of conversations
16 concerning my enrollment over the next two days.

17 Q At the time, were you responsible for running a NXIVM
18 Coach Summit?

19 A I was, yes.

20 Q Just very briefly, what is a Coach Summit?

21 A A Coach Summit is an opportunity for the coaches and the
22 higher-level NXIVM ranks.

23 So the people who run the programs, who work with
24 the students, who come in, who participate in the educational
25 programs and who run those. Who run -- who work in the

Salzman - Direct - Hajjar

1685

1 centers. Those are our coaches and proctors and senior
2 proctors. These are the high ranks.

3 This was an opportunity for us to come together and
4 we would put on a retreat once a quarter, but basically we had
5 centers in three different -- mostly in three different
6 countries. So it's a lot of people from a lot of different
7 areas coming all together and setting their vision for what
8 they wanted to do or achieve the next quarter. And how they
9 could work together to overcome some of the limitations they
10 were having or support each other better.

11 Q What was your role at this Coach Summit?

12 A Well, I was an executive board member so the summits in
13 recent years were run by the executive board. And I was
14 bringing ESP to a higher level, like what you might consider
15 like a vice president or a higher upper-level management
16 position.

17 But in this case, two of our highest ranks and close
18 personal friends had passed away, so they were the highest
19 ranks in ESP so they were no longer with us. And then the
20 next highest rank was inactive. And so this was the first
21 Coach Summit where I was the highest active rank.

22 So it was very important to me to run it well and do
23 a good job and have people feel I was the leader that they --
24 that they didn't feel that I had gotten my position through
25 default because everybody died or went interactive, but

Salzman - Direct - Hajjar

1686

1 actually that they felt confident in my leadership and felt
2 glad that I was the leader. So it was -- it was especially
3 important for me.

4 Q Were one of those individuals who passed away Pam
5 Cafritz?

6 A Yes.

7 Q So what happened after that initial discussion with the
8 defendant?

9 A Rosa Laura approached me, and we had a meeting in her car
10 where she introduced the concept of collateral and me
11 committing my first collateral. So for secrecy.

12 Q Did you have subsequent conversations with the defendant
13 around this time too?

14 A I did.

15 Q What did he say?

16 A He told me that he had started a sorority. That there
17 were seven members of founding members, and that they were
18 going to invite me to be a founding member.

19 He told me that the intent was that -- which I
20 believe I later found out was not true, but that they had
21 always intended that I would be a founding member. And that
22 he asked me if I could guess who the other members were.

23 He told me that the sorority had started because of
24 a personal struggle that Camila had had surrounding a suicide
25 attempt.

Salzman - Direct - Hajjar

1687

1 And I can't quite recall. But definitely those
2 things.

3 Q You said he asked you to guess.

4 Did you guess?

5 A I did guess. I wouldn't have guessed Rosa Laura. But
6 once I knew Rosa Laura, I guessed the others.

7 Because there had just been a series of events of
8 things going around me that I had been aware of with the other
9 members, that once I understood there was a sorority, they
10 made sense. So I was able to guess who was in it.

11 Q And those individuals, those were the women you've
12 identified as the first line of DOS?

13 A Correct, yes.

14 Q Did you propose -- did Rosa Laura, when she approached
15 you, discuss collateral at that time?

16 A Yes.

17 Q Okay. And what happened after that?

18 A I went home to come up with my collateral, and I came up
19 with the collateral that I submitted to her. That was
20 rejected.

21 Q Okay. So what form did that collateral take?

22 A It was -- I sent it in a WhatsApp message.

23 Q And you said it was an account of a crime. You described
24 that earlier?

25 A Yes.

Salzman - Direct - Hajjar

1688

1 Q Was this true?

2 A Yes.

3 Q When had this occurred?

4 A In the fall of 2002.

5 Q Can you explain what it was that you -- that happened and
6 that you wrote down as part of your collateral?

7 A That there had been a woman from Mexico who had come to
8 take an ESP course, and in the -- in the days of the course
9 she had what I would characterize as a psychotic episode, like
10 a psychotic break.

11 And she -- in my opinion, she should have been
12 hospitalized. But this was something that we hadn't -- we
13 didn't see, we hadn't seen in this way to this extent and
14 didn't know what to do about it.

15 So we started seeing bizarre things with her
16 throughout the day. And then she showed up at volleyball
17 where Keith was and became very agitated and physically
18 violent to the people around her.

19 And he suggested that we should take her -- he told
20 us to take her out of volleyball and that we can drive around
21 in the car and try to calm her down, and then eventually told
22 us to take her to a friend's house.

23 And so we took her a place where she could be safe
24 and wouldn't hurt herself. Which we did.

25 And then he was communicating through my mom to me.

Salzman - Direct - Hajjar

1689

1 And later he said it would be good if she could sleep. That
2 he thought if she slept that she could have like a -- she
3 would be able to -- she was overprocessing. She would be able
4 to process and become lucid again. But that this was some
5 type of like a spiritual crises or something. If she could
6 get through, it could be very progressive for her.

7 And so we couldn't get her to calm down or to sleep.
8 And he told my mom -- he told my mom that if she took Valium
9 she could sleep.

10 And so my mother had a prescription of Valium that
11 she had gotten from my father, which she gave to me, and in --
12 we wanted her to take the Valium, and she didn't take the
13 Valium.

14 And then at one point she became physically violent.
15 And two men who were there, one man restrained her so that she
16 would stop hitting and kicking other people. And the other
17 one basically pilled her like I pill my cat. I just took the
18 Valium and put it right down her throat.

19 And then -- and she was expressing at the time that
20 she felt hurt, like she was being hurt being held down, didn't
21 want to be held down, and she wasn't liking what was going on.
22 She wasn't -- most of what she was saying was pretty
23 incoherent. That was not incoherent.

24 And then she slept for a little while, but then was
25 up again. And there was concern that she wouldn't -- we were

Salzman - Direct - Hajjar

1690

1 concerned that she would still be psychotic. So somebody put
2 another Valium in some scrambled eggs and fed them to her for
3 breakfast. And so eventually she did calm down and reset and
4 went back to what would be considered normal.

5 But my collateral basically was laying all this out
6 that this women had been administered prescription medicine
7 against her will. That it implicated Keith, my mom, my dad,
8 and all the friends who were there in this.

9 And it was the most damaging thing that I could
10 think of that hurt the most important relationships in my
11 life, and I thought would be the most -- and was true, and
12 that would be the most weighted collateral. And it would hurt
13 me, you know, so I thought it was the most substantial thing
14 that I could come up with was this.

15 Q At any point was that women taken to a hospital?

16 A She was not, no.

17 Q Did she know that she was being administered Valium in
18 the morning?

19 A I don't know. I never told her she was and she and I
20 never discussed it, and no one ever told me she was, so I
21 believe no.

22 Q Was there a concern about taking her to the hospital?

23 A I believe there was a concern that if she went to the
24 hospital, it would make NXIVM look bad. Like somehow we
25 caused her to have that. That we have done that to her

Salzman - Direct - Hajjar

1691

1 somehow.

2 Q You testified you chose this as your collateral because
3 it was particularly damaging to you.

4 Why? Why was that?

5 A Because it was criminal that I had done. And also
6 because it was -- or that I participated in, and I was
7 complicit, and it implicated the people who the most important
8 to me in the same way.

9 Q And at the time was defendant one of the most important
10 people to you?

11 A Yes.

12 Q Did Rosa Laura Junco accept that collateral?

13 A No, she rejected it.

14 Q Did she tell you why?

15 A She told me that she rejected it because it would be a
16 conflict of interest for Keith to release the collateral,
17 because he would be implicated in the collateral.

18 So if I were ever to leave The Vow, he wouldn't be
19 able to use it, because it would hurt him, so she didn't
20 accept it.

21 Q And at that time, did you believe your collateral would
22 be released if you violated The Vow?

23 A Yes.

24 And to me that -- that whole thing speaks to if he's
25 planning on releasing the collateral, but this one he couldn't

Salzman - Direct - Hajjar

1692

1 release because it would hurt him, so I would be able to get
2 off the hook. So I needed to submit something that wouldn't
3 hurt him so he would be sure to feel good releasing it, if I
4 ever break my vow.

5 Q Did Rosa Laura suggest something else as collateral?

6 A She suggested naked pictures.

7 Q Did you ask her if she had taken any?

8 A I did.

9 Because that wouldn't be something I normally would
10 do. And it was just an unusual request and I felt very
11 vulnerable doing something like that. Is that something you
12 had done? Just so I know where it came from.

13 The only time I had ever done it was when Keith took
14 pictures of me and I was very uncomfortable about that even
15 with him.

16 So she said, yes, that she had done that. And for
17 me that made a big difference because Rosa Laura was very
18 conservative and came from a very conservative background.

19 So when she -- if she had done it, then I was like,
20 well, okay, I mean if you've done it, you feel confident.

21 And I asked her, too, like what's going to happen to
22 the pictures? And she said, Don't worry, they're going to be
23 safe and secure. She was going to keep it in a box safe in
24 her house and nobody was going to ever see it.

25 And I was like, okay, and so then I did that. I

Salzman - Direct - Hajjar

1693

1 took, I believe, three pictures of myself that I put on a USB
2 drive and I gave them to her.

3 Q After you gave Rosa Laura Junco the drive with the naked
4 photographs, what did you do next, what happened next?

5 A Then once I did that, she told me -- she gave me the DOS
6 pitch. She explained to me the concept of the vow of
7 obedience. That this is a lifetime vow of obedience.

8 I asked if it was to her, and she told me it was to
9 Keith. And that -- she explained the concept that he would be
10 my master and I would be his slave, and the idea that having a
11 master in your life is to help you learn to become a master in
12 your own life, and that we're all slaves of something. That
13 we serve something in our life.

14 And we could learn to serve our issues, or we could
15 learn to serve our principles. So that this was about
16 learning to -- how to serve our principles with the highest
17 value.

18 And she told me that there would be a collar, which
19 initially I did interpret to mean like a BDSM collar. But
20 then she told me that was not what she meant, that she meant a
21 piece of jewelry that I wouldn't take off that symbolized my
22 chain to my master.

23 And she explained that there would be a brand. And
24 that the brand -- the idea of the brand was to memorialize on
25 our body our promise to ourselves that we made for this

1 lifetime commitment to our growth and to our master.

2 And this idea that to serve our highest principles
3 ultimately at some point, if you're going to be noble in your
4 life, if you look at people who have been noble in life, like
5 they've gone against tremendous adversity. You know, it's not
6 just everybody that we can say that amazingly noble person,
7 there's just a few people, and most of us know who they are
8 that walk the earth that we look at and pulled out as these
9 respectable people who are upheld, incredible noble principles
10 against adversity.

11 And they did so in the face of being sometimes
12 murdered or persecuted or these types of things, and that to
13 become that type of a person you have to go through
14 experiences that are difficult or that are painful.

15 And this is something that we had studied in ESP and
16 something I taught in my curriculum. I was very familiar with
17 the concept. I was very enrolled in that idea of doing hard
18 things to become somebody who could do hard things when it was
19 most important in doing hard things to uphold your most --
20 your highest ideals.

21 And that going through the branding was an
22 experience of overcoming pain for this principle. And the
23 principle was this principle of love and of a sense of self.

24 And I was concerned about the brand, like I -- that
25 was not something that I ever, you know, thought of. But when

Salzman - Direct - Hajjar

1695

1 she gave me that explanation for it, like I don't have any
2 tattoos, it was -- I would never have gotten something like
3 that.

4 But when she explained it like that, the idea of
5 overcoming pain for a principle was compelling to me.

6 Q You mentioned that you were enrolled in that idea. What
7 does that mean?

8 A Yeah. Yeah, you could say -- or I came to agree with it
9 and support it. And I wanted to go forward with that. So I
10 said, yes.

11 Q Was Rosa Laura branded at the time?

12 A Yes, and she showed me her brand. And she asked me if I
13 knew what it was and I couldn't -- I didn't know what it was
14 and she pointed out it was Keith's initials.

15 Q But when you looked at it at first, you couldn't tell
16 what it was?

17 A Correct.

18 Q At some point later, did Rosa Laura Junco tell you
19 anything about whose idea the brand was?

20 A Yes. I mean I had -- my understanding was that the women
21 had decided that they wanted to be -- some women who were
22 not -- I was never told who the women were, but that the women
23 had decided, like somebody wanted to get a tattoo at some
24 point and then another person said that we should get a brand
25 because even tattoos could be erased or there's some

Salzman - Direct - Hajjar

1696

1 impermanence now. So a brand would be more permanent. And
2 that the women had decided this.

3 And after Keith was indicted and arrested, arrested
4 and indicted, I said something to Rosa Laura about it, and she
5 said the women didn't choose it, why would we ever choose
6 something like that? Who would choose that? And she
7 basically said, you know, no, Keith wanted us to do it.
8 That's why we did it. None of us would have ever come up with
9 the idea that we would brand ourselves. That's crazy.

10 Q Initially were you told about the existence of other
11 women in DOS aside from this initial group?

12 A I believe I was told there were some but I wasn't told
13 who they were. But not that I was being invited as a founding
14 member, which is different.

15 Q And beyond the naked photographs, did you have to submit
16 additional collateral?

17 A Yes.

18 Q And what kind of things did you submit as collateral?

19 A Basically everything material I owned; my finances, my
20 investment accounts, my two homes, two cars, all my art,
21 anything that I owned. And then I believe I also made
22 commitments that I, you know, would resign from my positions,
23 these types of things. It was -- it was I would give up
24 everything that I held dear to me --

25 Q And did you --

Salzman - Direct - Hajjar

1697

1 A -- in my life.

2 Q -- in a document list all these things?

3 A I did. I believe I sent it in a Telegram initially.

4 Yeah, that's what I believe that.

5 Q Did you, in fact, get branded?

6 A I did, yes.

7 Q And how soon after you agreed to join DOS were you
8 branded?

9 A Within like 48 or 72 hours. It was very quick.

10 Q When was your branding ceremony scheduled for?

11 A January 10th, 2017.

12 Q Did it coincide with something in particular?

13 A It was -- it coincided with the first night of Pam's
14 memorial.

15 Q This is Pam Cafritz, the woman to who died a few months
16 prior?

17 A Yes.

18 Q Did you have a discussion with the defendant at the
19 memorial service?

20 A I did, yes. Yes.

21 Q Can you explain what happened?

22 A He was asking me about the branding ceremony, like, so
23 tonight is the night we're going to do? And he was like very
24 excited about it.

25 And he was similarly excited like when he told me he

Salzman - Direct - Hajjar

1698

1 started a sorority, he laughed about it. Like this was some
2 really strange and unusual funny thing or -- but to me it
3 wasn't because everything that we had done in 20 years were
4 all things that Keith had started. So it wasn't a different
5 type of thing in my mind. He started everything. So him
6 started this was not unusual.

7 And I had been in a sorority in college that was
8 cofounded by a man. So it wasn't like even to me that a man
9 might found a women's organization. But his reaction to it
10 was unusual. Because he wasn't usually emotionally expressive
11 in that way about the different things.

12 And his enthusiasm and excitement about the brand
13 also stood out, because it was -- like it stood out in
14 contrast to -- we were at some memorial service, it was very
15 somber and sad and serious. So his excitement and enthusiasm
16 especially stood out to me.

17 Q Looking back now, do you see any significance as to the
18 timing of your recruitment into the DOS?

19 A Yes, I do.

20 Q Can you explain that?

21 A So, yeah, I mean there's a lot of background to it. So
22 it's hard to explain it just concisely, but that -- I mean,
23 Keith and I had a relationship, we had a -- prior to all of
24 this. We had a romantic and sexual relationship for a period
25 of time that tapered off slowly and it stopped at some point

Salzman - Direct - Hajjar

1699

1 in time.

2 And so for the ten years prior, or almost ten years
3 prior to my being invited into this, we hadn't had any
4 relationship like that. And around -- there were things that
5 happened around 2009, and I think on Friday when I was here I
6 had talked about Barbara Bouchey left at some period of time
7 and I thought it was a little bit later, but 2009 the Dalai
8 Lama came to Albany, and Barbara left right at that time,
9 so like around 2009.

10 And there was a lot of -- like Keith would
11 frequently say that -- and his relationship with Barbara was
12 very involved and very tumultuous in certain ways. And when
13 she left she was very vocal and did a lot of like press. She
14 did interviews about the things going on in ESP but she --
15 that were concerning to her.

16 And frequently Keith would say that if we had gotten
17 our act together sooner this never would have happened. And
18 specifically he said my mom was very problematic.

19 So there were a lot of things that happened that
20 were stressing in the companies and in the community on the
21 heels of this that he frequently would say that we didn't
22 understand how important this stuff was and he told us and we
23 weren't listening.

24 And so I, coming out of that time period, 2009, and
25 during the time that he and I didn't have a romantic or

Salzman - Direct - Hajjar

1700

1 physical relationship, I was trying to prove myself, you know,
2 and make up for the failures of the past.

3 And around 2012 he -- somewhere in there he told me
4 that at some point he had decided -- he had made the decision
5 to put our relationship on hold five years prior.

6 And that was very difficult for me to understand
7 because when he taught us things of having to do with
8 agreements with other people, he always said that if you
9 wanted to change the nature of an agreement with somebody you
10 should go to the person and discuss it with them.

11 So the fact that he had made the decision to change
12 our relationship five years prior and had never discussed it
13 with me was something that I had never -- I couldn't even
14 understand how that could have been.

15 And then I was like, well, if he made this decision
16 to put our relationship on hold and I wasn't even aware of it,
17 then I must be doing a very bad job. And so a lot of what I
18 was doing was trying to compensate for these types of things.

19 And the -- when Barbara left, she was very vocal
20 about feeling that there was nepotism within the high ranks of
21 ESP and that the executive board was primarily made up of
22 women who either were or had been in sexual relationships with
23 Keith, and that this was of specific concern to her.

24 And that -- about a year before she left, Keith told
25 the executive board that if we didn't get our act together, he

Salzman - Direct - Hajjar

1701

1 was going to basically just fire us all and replace us with a
2 new board.

3 So I went to Mexico and I started working to build
4 our business in Mexico and every like probably six to eight
5 weeks I was running a course fulfilling these Level 2
6 intensives, and I did this for a year, year and a half leading
7 up to the Dalai Lama and trying to prove that I could keep my
8 leadership role, was worthy of having this role, was making up
9 for the failures of the past.

10 So then when it became some of the things --
11 Barbara's concerns were being expressed vocally among our
12 membership and in the media, Keith fired the entire executive
13 board and replaced it with new business. So lost my position
14 anyways.

15 Within six months, I was back on the executive
16 board, because nobody in ESP had did my role. And the new
17 business building board had no connection to the product,
18 which was the education or the people, which were our members,
19 and the people who were buying the product. And that I
20 performed a unique function. So then I got back on the
21 executive board.

22 Fast forward a little bit to 2014. 2013 I wanted to
23 leave the relationship. We weren't having a relationship any
24 more in that way. But I was told I might be able to have it.
25 He asked me if I would stay. He said he would invest in our

Salzman - Direct - Hajjar

1702

1 relationship. If I did stay and we would have children within
2 five years.

3 2014 he started Ultima, which was a new company, and
4 that new company had a series of companies within it. And he
5 took the ethics curriculum. And I was the head of the ethics
6 board in NXIVM and one of only two people who taught that
7 curriculum as it had existed prior. He took it and put it in
8 the new company, Ultima. And he made Daniella the head,
9 Daniella Padilla, the head of this new ethics curriculum.

10 So he took the ethics curriculum out of ESP, out of
11 where I taught, and put it in the new thing and now Daniella
12 was the head of it.

13 So by the time -- so Pam got sick in 2015, and
14 around this time, you know, we took two trips to Fiji and --
15 because Pam wanted to see Fiji before she died and those trips
16 were very Marianna centric. It was whatever Marianna wanted.
17 The trip centered around Marianna.

18 And he told me on the trip that he was going --
19 thinking of having a child with Marianna to balance things
20 out.

21 And to me this was like completely crazy because so
22 much was centering around Marianna and I didn't understand how
23 given Marianna more was going to balance everything out.

24 And in those two years that Pam was sick, I found
25 myself very much on the outside. And when he told me Marianna

Salzman - Direct - Hajjar

1703

1 was pregnant, or when he told me Marianna was -- he thinking
2 of having a child with Marianna, on that same trip he asked me
3 to agree to stay with no child and no relationship.

4 So I have now been 12 years waiting for a
5 relationship and a child that we were -- by the time DOS came
6 that never came. I had been cut out of several leadership
7 roles in the organization. And in the two years Pam was sick,
8 all of a sudden Keith was surrounded by a new group of people
9 and had this new inner circle.

10 And in January, at New Years, I -- we did this New
11 Year's process where we would get together and share all of
12 our goals, and we did -- like what were the highs and lows of
13 the last year. And I was in a group with Monica, Daniella
14 Padilla and Loreta Garza and I shared that. At some point
15 I -- and I don't know when it happened, all of a sudden I
16 found myself on the outside of my group of friends. That like
17 I don't -- that everything changed and now I wasn't part of
18 the inner group any more.

19 And there had also been this vacation, this -- in
20 December, so I'm going back -- I'm sort of jumping around a
21 little, just a lot of things happened to inform why I think
22 it's significant.

23 Keith and Marianna rented a house in Woodstock at
24 Christmas time and they invited a bunch of us to go. And it
25 was the most bizarre trip to me. It was like the coming out

Salzman - Direct - Hajjar

1704

1 in a public forum of Keith and Marianna's relationships.

2 So it was like Keith and Marianna sharing a bedroom.
3 Her dad was there. Her brother and his wife were there. And
4 a bunch of my girlfriends, me and my mom, and Jim and Esther.
5 It was such a weird group of people. But the whole thing was
6 like Keith and Marianna as a couple, and everybody else there
7 happy about it. But I didn't feel happy about it. And it was
8 confusing to me. And I -- and it was upsetting to me, and I
9 didn't understand it.

10 And then later -- so then he tells me all of a
11 sudden, after 12 years, all of sudden I want to bring our
12 relationship closer, gets me in a collateralized vow for like
13 committed to growth.

14 I'm the head of the growth program of ESP, now I'm
15 in a collateralized life vow backing my word for growth, and
16 ten days later he tells me Marianna's pregnant, which he had
17 known for three months.

18 And so I was -- I was like this -- oh, my God, like
19 there's no way -- like he got me to stay because he thought I
20 would leave if Marianna was pregnant. And he stole from me
21 and himself the ability to know if I would have stayed no
22 matter what without being a hundred percent collateralized
23 vow.

24 Q How did he get you to stay?

25 A By getting me to promise that through a collateralized

Salzman - Direct - Hajjar

1705

1 vow -- my entire life was collateralized in this. And also I
2 was -- I'm the head of the growth program of ESP. I said I
3 would do anything for growth. I'm a hundred percent committed
4 to growth. I collateralized my entire life and now all of a
5 sudden I'm saying I don't want to do this with you because
6 Marianna's pregnant? My life couldn't have existed intact any
7 more. It couldn't -- it couldn't have. I couldn't have
8 maintained the integrity of my whole life if I all sudden gone
9 I don't want to do this.

10 And I hundred percent think that the timing on it is
11 because of that.

12 Q Any significance to the fact that Rosa Laura Junco was
13 the one that approached you?

14 A Hundred percent significance.

15 Because when he told me, when we were in Fiji a year
16 prior, and he told me Marianna -- that he was thinking of
17 having a baby with Marianna and I was incredibly upset and
18 distressed over it, I asked -- he told me he didn't want me to
19 speak to my mom about it. And I didn't know who to talk to
20 about it. And he said how about Daniella Padilla? And I did
21 not want to talk Daniella Padilla about it. And he said who
22 do you want to talk? And I said Rosa Laura.

23 And Rosa Laura was the person who a year earlier
24 reenrolled me in staying in a relationship with him when he
25 was choosing to have a baby with a Marianna and telling me I

Salzman - Direct - Hajjar

1706

1 was going to stay with nothing.

2 So she had already been the one I wanted to go to,
3 and the one I trusted and the one who had successfully
4 reconvinced me that this was the best path for me because of
5 my growth, because of the opportunity to be able to gain
6 things through having her as my mentor and my teacher, staying
7 in this relationship with him. That I would never be able to
8 have him the whole rest of my life ever if I left.

9 And so she was hundred percent, I think related
10 to -- a hundred percent related to why she was chosen to be to
11 the one to ask me, and at the time when Marianna actually was
12 pregnant.

13 Q At the time you learned of Marianna's pregnancy, did you
14 question the defendant's motives in enrolling you into DOS?

15 A Yes. And that I couldn't handle it. I was like there's
16 no way he could have done that. And I stuffed it, I
17 compartmentalized it, and hundred percent went full force
18 forward with my conviction that DOS was not bad, that it was a
19 growth program, that it was amazing, that this was for women,
20 and for me to get through my issues, and I just did that.

21 Q You did tie your continued employment, your work with
22 ESP, to staying committed to the defendant?

23 A I did, yes.

24 Q Can you explain that?

25 A Because I gave my word, which is a huge thing in our

Salzman - Direct - Hajjar

1707

1 company, that I would be a hundred percent committed to my
2 growth, and my growth was this collateralized vow of
3 obedience.

4 So I left it, I would be breaking my word to commit
5 to growth. How could I stay in the position I was in as the
6 head of the growth program that taught the concept of
7 collateral -- of discipline of word, of all these things if I
8 was the person who didn't do it.

9 Q Looking back now, do you see significance about when DOS
10 was created as to -- as related to Pam Cafritz, the woman you
11 were describing earlier?

12 A Yeah, I do.

13 Q Can you explain that?

14 A Because I think Pam -- Pam facilitated all Keith's
15 objectives, whatever Keith wanted in many of his personal
16 relationships, and especially my relationship with Keith was
17 facilitated by Pam, you know, I -- that she reenrolled me in
18 my relationship with Keith time and time again throughout the
19 duration of my relationship with Keith. And at the time she
20 died, I think she left, from her illness and her subsequent
21 death, left a big hole of people who were that and would do
22 that for him and DOS was doing that.

23 MR. LESKO: Your Honor, I'm moving to another topic
24 now.

25 THE COURT: All right. We'll take our lunch break.

Salzman - Direct - Hajjar

1708

1 All rise for the jury.

2 (Jury exits the courtroom.)

3 THE COURT: All right. The witness may stand down.

4 (Whereupon, the witness steps down.)

5 THE COURT: Please do not discuss your testimony

6 with anyone.

7 We'll take an hour for lunch. Thank you.

8 (Whereupon, a recess was taken at 1:00 p.m.)

9 (Continued on the next page.)

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Proceedings

1709

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

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3

--oo0oo--

4

THE COURT: Here we go.

5

All right. How much more do you have on direct of

6

this witness?

7

MS. HAJJAR: Some time, Your Honor. It would

8

likely be the end of the day.

9

THE COURT: To the end of the day --

10

MS. HAJJAR: On direct examination, yes.

11

THE COURT: -- at least.

12

MS. HAJJAR: At least.

13

THE COURT: Okay.

14

All right. Let's bring in the witness, please.

15

(The witness resumes the witness stand.)

16

THE COURT: And let's bring in the jury.

17

(Pause in proceedings.)

18

(The Jury enters the courtroom.)

19

(The Jury present.)

20

THE COURT: Please be seated, everyone.

21

All right. Ms. Hajjar, you may continue your

22

examination of the witness.

23

I remind the witness that she is still under oath.

24

25

Salzman - Direct - Hajjar

1710

1 DIRECT EXAMINATION (CONTINUED)

2 BY MS. HAJJAR:

3 Q Ms. Salzman, you testified that you did get the
4 brand --

5 A Yes.

6 Q -- that the defendant told you about. When was that?

7 A It was on January 10th, 2017.

8 Q And at that time did you have an opportunity to meet
9 the entire first line that you described earlier?

10 A I did, yes.

11 Q Who branded you?

12 A A woman named Danielle.

13 Q Was she a doctor?

14 A Yes.

15 Q At the time, did you have an understanding as to
16 whether Danielle was a member of DOS?

17 A Well, Danielle got excited that I was getting branded
18 and she showed me her brand, so I learned she was a member
19 of DOS.

20 Q Did you later learn something about the fact that she
21 had shown you her brand?

22 A Yeah. She was disciplined for it because it was an
23 indiscretion. She wasn't -- she was supposed to keep it
24 secret.

25 Q Was Danielle, as you understood it, under you in rank

Salzman - Direct - Hajjar

1711

1 in DOS?

2 A Yes.

3 Q Can you explain that?

4 A Danielle was enrolled by Allison, so she was
5 second-line DOS and I was first-line DOS. So I was higher
6 rank.

7 Q Can you describe the branding ceremony to the jury?

8 A Sure. So we went to Allison's house. She was out of
9 town, but we did it there. And when I arrived I saw -- this
10 was the first time that I was together with all of the
11 first-line DOS masters. So Rosa Laura told me that the
12 first thing that they did was take a naked picture. So
13 everybody removed their clothes and we took the naked
14 picture. And then she read to me basically the concepts
15 that are in the banding ceremony first, and they're similar
16 concepts to what are also in the book. So basically about
17 you're making the vow of obedience to the master, that
18 you're surrendering your body, your property, all these
19 things, all the concepts that we reviewed earlier and that
20 there were responses that I was to say back. So she would
21 read something to me and I would -- and tell me the response
22 and I would say the response back. So we went through it
23 once before the branding ceremony.

24 Then Danielle arrived and helped me put a stencil
25 on where the brand would be, which is on the hip like in the

Salzman - Direct - Hajjar

1712

1 bikini line, and then we went into a room where there was a
2 massage table, and first I knelt down and there's a line
3 that you read that she instructed me to read and that she
4 instruct everybody who is getting branded to read, Master
5 please brand me. It would be an honor, an honor that I want
6 to wear for the first of my life. So that's how it starts.
7 And then you get up and lay on the table, and my arms were
8 held above my head. Then I had like all my circle around
9 me, holding my legs and touching different parts of my body.
10 I was clothed because I was above Danielle in rank, but
11 normally everybody would be nude.

12 Q And the words you were -- the words you said, Master,
13 please brand me. It would be an honor. Was that part of a
14 script that was shown to you at that time?

15 A Yes, it was. Yes.

16 Q Did the branding itself hurt?

17 A Yeah, it was really painful.

18 Q Can be describe what it is exactly?

19 A What it is? It's an -- it's electricity, but it's like
20 a pen. It cauterizes the skin. So basically it -- it
21 makes -- it does like a third-degree burn, so it creates a
22 scar, ultimately creates a scar. Immediately it just burns
23 the skin in a line. Once it goes across, the skin is dead
24 so you don't feel it afterwards. It's only when it's making
25 the line that it hurts, but it's incredibly painful. It's

Salzman - Direct - Hajjar

1713

1 the most painful thing I've ever experienced.

2 Q Does it look -- in the branding ceremony does it feel
3 like a burn; does it look like a burn?

4 A It looks like a third-degree burn after you get it,
5 yeah. I mean, it's -- it's raw skin that then becomes
6 scabbed over and the scab falls off and then it scars. But
7 it -- it's electricity so it shocks the skin as it goes
8 across and it -- it feels -- it feels like what it is. It
9 hurts a lot.

10 Q How long did the branding take?

11 A It took -- it was -- the actual branding of the burning
12 of the skin only took a few minutes, but the whole process
13 took about like half an hour, 45 minutes to go through
14 the -- the actual branding plus the script, the reading back
15 and forth.

16 Q Was it videotaped?

17 A Yes.

18 Q Who videotaped it?

19 A Loreta.

20 Q And after you were branded, did you then regularly meet
21 with that first line?

22 A Yes.

23 Q After you were branded, did you have a conversation
24 with Allison Mack about having joined DOS?

25 A Yes, I did. Yes.

Salzman - Direct - Hajjar

1714

1 Q What was that discussion?

2 A Allison was very excited that I joined, and she -- she
3 felt, like, excited to share everything that she had never
4 been able to share that came with DOS. And her experience
5 with DOS was a little bit different than mine, but what --
6 what she shared with me is that she never had a relationship
7 with Keith until she joined DOS. So when Daniella enrolled
8 her into DOS, she enrolled her also into a relationship with
9 Keith or it happened contemporaneously, as I understood it.
10 So Allison didn't really understand and I have never
11 discussed with her what my relationship with Keith was, so
12 she was very excited and enthusiastically -- like, Isn't
13 this great? Like now not only do you have this master, but
14 you have, you know, all these new sister wives and she was
15 like so excited about that. And I was like, Number 1, I've
16 had sister wives for 20 years; Number 2, this is not -- it's
17 something that's -- it's been something that's been
18 incredibly difficult for me, and then I'm -- I didn't know
19 about some of these relationships, including Allison's,
20 which I just learned about then.

21 So for me, it wasn't as exciting as it was for
22 her. But she was -- I didn't share that with her because I
23 didn't want her to not be enthusiastic or feel happy about
24 her experience and I didn't want her to feel like she
25 couldn't share things with me. But for me, it was really

Salzman - Direct - Hajjar

1715

1 hard.

2 Q Did she mention children in this conversation?

3 A I'm not sure if it was this conversations or after, but
4 she was like, yeah, we're going to raise our babies together
5 and we're going to do all these things. And I came to learn
6 that she believed she was having children with Keith,
7 Daniella also now is believing she was having children with
8 Keith and for me, this was just a lot to learn.

9 Q And when you say, Daniella, this is Daniella Padilla?

10 A Correct.

11 Q Did you have a subsequent conversation with Daniella
12 Padilla?

13 A Yes. Well, I went to Keith and was like, You're having
14 babies with Allison and Daniella and he said no, not
15 necessarily, you know, that's not -- and actually he acted
16 like he didn't know really quite where they got that idea.
17 And then I had a subsequent conversation with Daniella where
18 Daniella was describing that she and Keith had discussed how
19 they were going go about doing this because they were going
20 to -- Daniella was going go to Marianna and ask Marianna for
21 permission for Keith to be the donor. So to make it like to
22 Marianna that it wasn't a relationship, that he was just
23 going to be the donor. So then I went back to Keith and was
24 like, we have to ask Marianna for her permission to have
25 kids, to have you be the donor? And so then he acknowledged

Salzman - Direct - Hajjar

1716

1 that he had had that conversation with Daniella which
2 negated the first conversation where he said he wasn't
3 discussing having children with them, and then didn't seem
4 to understand why it would be a problem for me to ask
5 Marianna this, why, you know, if he could be the donor.

6 Q Did you have discussions about recruitment of other
7 slaves in these meeting with the DOS first line?

8 A Yes.

9 Q And you testified that you recruited slaves?

10 A Yes.

11 Q Who did you discuss potential recruits with?

12 A With the first line and with Keith.

13 Q Were any prospects rejected?

14 A Some.

15 Q Can you give us some examples?

16 A Audrey wanted to enroll Siobhan and I discussed it with
17 Keith, and he said he wasn't sure that that was a good idea.
18 Clare's name was raised a bunch and he wanted to keep that
19 separate.

20 Q Clare Bronfman?

21 A Yes.

22 Christina was another one he was thinking about if
23 it was a good idea. I mean, these are ones that came up
24 directly with me. I'm sure there are others, but these are
25 ones that either myself or people who I enrolled wanted to

Salzman - Direct - Hajjar

1717

1 enroll.

2 Q Who had the final say about who could be enrolled and
3 who couldn't?

4 A Keith.

5 Q Did the defendant ever ask you for photographs of
6 potential recruits?

7 A Yes.

8 Q Did the defendant say anything about the marital status
9 of the person that you should recruit for DOS?

10 A Not that I should, but that he said initially it was
11 going to be sorority for only people who were not married.
12 And then eventually they decided or at some point they had
13 decided to let in people who were married.

14 Q And when you recruited your DOS slaves, did you lie to
15 them about the defendant's role in DOS?

16 A Yes.

17 Q And what about the brand?

18 A Yes. Well, I didn't tell them anything about the
19 brand. They asked what it was, and I said it was a symbol,
20 you know, and then during the branding ceremony, Carola saw
21 the stencil and was like, KR, like she knew. She realized
22 that it was Keith's initials, and I asked her to please not
23 share that with other people.

24 Q Who did you recruit first?

25 A Sarah.

Salzman - Direct - Hajjar

1718

1 Q And where did you initially approach Sarah about
2 enrollment into DOS?

3 A I approached her in Vancouver. I was staying in her
4 home there.

5 Q Why were you in Vancouver at that time?

6 A I was teaching intensive in her center.

7 Q About how soon after your enrollment into DOS were you
8 recruiting Sarah?

9 A Five days.

10 Q Was Sarah married?

11 A Yes.

12 Q And can you describe to the jury what the process was
13 for recruiting her?

14 A Sure. It was -- it was the same process that
15 Rosa Laura did with me, that I approached her and told her
16 that I was doing something I was very excited about. I
17 wanted to share it with her. And that this might sound
18 weird, but I needed a guarantee from her that she wasn't
19 going to speak about this to anybody else, and I introduced
20 the concept of collateral, which she provided me. And then
21 when she provided it, I went through the four aspects of it,
22 lifetime vow of obedience to me; master/slave concept;
23 collar, which was the necklace; and branding, and she
24 decided she wanted to go forward and provided more
25 collateral.

Salzman - Direct - Hajjar

1719

1 Q Did you characterize DOS as a sorority for women?

2 A I did, as a sorority for women.

3 Q What was the first piece of collateral that Sarah gave
4 to you?

5 A She gave me like a confession that she had written on a
6 piece of paper basically confessing to things that would be
7 embarrassing for her reputation if they were to be
8 disclosed, things along the lines of sexual experiences or
9 substance use.

10 Q What did you do after Sarah gave you that collateral?

11 A I checked it with Rosa Laura.

12 Q What happened?

13 A Rosa Laura didn't think it was strong enough and
14 suggested naked pictures as well.

15 Q So what did you do after that?

16 A I went back to Sarah and told her about the naked
17 pictures and she agreed to take them, and we took them
18 together, meaning I was with her in the room when she took a
19 naked picture of herself. And Rosa Laura then said that I
20 could go forward after that.

21 Q Did you tell her anything about whether you had taken
22 similar photographs?

23 A I did. I told her I had done it as well.

24 Q Did Sarah express any reservations about the branding?

25 A Yes. Very similar to mine, that she had shared as well

Salzman - Direct - Hajjar

1720

1 she had never gotten a tattoo and she had certain views
2 about her body and caring for her body, and this kind of
3 went against that. But I -- re-enrolled her in the idea
4 that I shared with her the idea of paying for a principle
5 and the memorializing your promise, and the -- the, you
6 know, on your body forever was a promise forever. And so
7 she agreed to do it.

8 Q When you say reenrolled her in that idea, you persuaded
9 her to go along with it?

10 A Yeah.

11 Q Did Sarah then agree to join DOS?

12 A She did.

13 Q Did she provide additional collateral to you?

14 A Yes.

15 Q What different collateral did she give you?

16 A We filmed a bunch of videos together, that the idea of
17 them was to make it look like it is candid, like she didn't
18 know that she was being recorded. But she was speaking
19 negatively about family members, like, you know, saying
20 things like that she only had a relationship with them to
21 get her inheritance or that her husband, you know, was
22 abusing her and her son. False statements, but that would
23 have damaged those relationships were they to be released
24 and also would damage the people in the video saying things
25 about them that would have hurt their reputations.

Salzman - Direct - Hajjar

1721

1 Q Why was it made to look candid?

2 A Just because if it were to ever be released, it
3 wouldn't be believable that somebody would have just looked
4 at a camera and made a video of themselves doing that, but
5 it was more believable that she could have just shared it
6 with a friend who happened to be recording it unbeknownst to
7 her.

8 Q Did she give the videos to you?

9 A I filmed them on my phone, so they were always in my
10 possession.

11 Q Were these videos sufficient collateral?

12 A No.

13 Q Why not?

14 A Because she had to fully collateralize all of the areas
15 of her life to be considered fully in. So she never, in
16 theory, completed the enrollment process.

17 Q Did the defendant discuss your recruitment of Sarah
18 with you?

19 A Yes.

20 Q What did he say?

21 A Oh, when I came back he was excited that I had enrolled
22 someone, and he said, like, she's your slave now. And I
23 said yes. And he said that means like -- and he had told me
24 that before -- that that meant that she had to choose that
25 relationship above all the other relationships in her life,

Salzman - Direct - Hajjar

1722

1 like above her husband, above her child, and I had even
2 discussed that with her. But I came back and he said that
3 means if you tell her she has to have sex with another man,
4 meaning another man not her husband, she had to do that.
5 And if you tell her she has to have another man's child,
6 that means she has to do that. And at the time I was like,
7 yeah, I get it. Like you just need her really committed.
8 She's committed. That was how I viewed it, but it doesn't
9 look the same right now.

10 Q How do you feel now about it?

11 A Well, I don't -- like why would that be the thing that
12 would indicate commitment as opposed to anything else? Like
13 if you told her she had to walk across hot coals, you know,
14 she would have to do it. Like why sleeping with somebody or
15 having their children, and given the fact that later I came
16 to find out he was having sexual relationships with other
17 people's slaves and some of those slaves were being -- that
18 was planned before he met them or anything that they wanted
19 to do. It was like known to other people that it was going
20 to go in that direction and also that he was discussing
21 having children with slaves, and it just was different. It
22 looks different, like, given their assignments to seduce him
23 and all of these things that came out later that I found out
24 later, it looks different knowing all of those things.

25 Q You said that you also recruited Audrey?

Salzman - Direct - Hajjar

1723

1 A I did.

2 Q How soon after Sarah was recruited did you recruit
3 Audrey?

4 A Like three weeks.

5 Q Where did you first approach Audrey?

6 A Audrey was in Albany taking a course and she came to me
7 and told me that she felt like she was losing her belief in
8 herself to be able to grow and get through her issues and
9 could I help her. And so I asked her -- I -- this was how I
10 decided to help her. I offered her this option.

11 So I went through the same process.

12 Q Can you -- can you describe your rank in ESP and your
13 role in ESP as it related to Sarah and Audrey?

14 A Sarah and I were the same rank but I had more stripes
15 so I was a higher rank in the same sash level. But Sarah
16 was a green, I was a green. Audrey was a coach, so she was
17 two ranks below and I was her center head as well.

18 Q What does that mean?

19 A I was co-head of the San Francisco ESP center, so she
20 was a coach in my center.

21 Q And did Audrey -- what happened after you approached
22 Audrey? What did she do?

23 A Audrey submitted naked pictures as her collateral and
24 additional collateral as well.

25 Q Can you describe generally the additional collateral

Salzman - Direct - Hajjar

1724

1 she provided?

2 A Initially she provided a letter accusing a past
3 relationship -- former relationship, a former romantic
4 partner of violence, domestic violence basically and it was
5 untrue but wrote it in a way that would have gotten him or
6 could have -- most likely gotten him fired from his job
7 which was a very good job. And then additionally she
8 provided -- we filmed a number of videos similar to Sarah's
9 videos where she told various stories that would discredit
10 people who were important to her of alleged affairs that she
11 had had with coworkers who were married saying that that's
12 how she achieved the level of position in the company she
13 was working. Things that would have been embarrassing or
14 humiliating to other former boyfriends and also that she
15 was -- she worked in a humanitarian organization and that
16 basically saying that she was posing as a humanitarian to
17 try to scam people out of money.

18 Q And before --

19 A And then afterwards, too, Audrey provided a bunch of
20 assets. She promised her car and she provided bank account
21 information as well, investment accounts.

22 Q And before Audrey provided all this collateral did you
23 lie about the defendant's role in DOS?

24 A I would tell -- yes.

25 Q Did you give Audrey the impression that this was a

Salzman - Direct - Hajjar

1725

1 women's group?

2 A Yes.

3 Q Were you at any point told you needed to enter into a
4 contract with your both DOS slaves?

5 A Yes. But -- at one meeting -- one DOS meeting right
6 before I enrolled Audrey, Keith asked why the contracts
7 weren't being used so I didn't know that there were
8 contracts, so I came to learn that there was a contract and
9 Rosa Laura said she had been trying to work on it with an
10 attorney but it wasn't finalized.

11 So then my -- but my understanding was he wanted
12 us to be using the contract. So with Audrey I used the
13 contract but then later we were told we shouldn't use it
14 until it was finalized. So Audrey and I did sign a contract
15 but I don't think it's -- I don't know. Whatever stage it
16 was in, we did -- she did fill out a contract.

17 Q Did you present her with a contract?

18 A I did, yeah.

19 Q Okay.

20 A Yeah.

21 MS. HAJJAR: Your Honor, may I approach the
22 witness?

23 THE COURT: Yes, you may.

24 Does the defense have one.

25 MS. HAJJAR: They have each of the exhibits, yes.

Salzman - Direct - Hajjar

1726

1 THE COURT: I'm sorry.

2 MS. HAJJAR: Yes, they have each of the exhibits
3 in this binder.

4 THE COURT: Okay. Thank you.

5 Q Ms. Salzman, I just handed you a binder. Can you flip
6 to what has been marked for identification as
7 Government's Exhibit 356 and 356R.

8 A Yes.

9 Q Do you recognize this exhibit?

10 A Yes. This is a contract with me and Audrey.

11 Q And is Government's Exhibit 356R a redacted version of
12 Government's Exhibit 356?

13 A It is, yes.

14 MS. HAJJAR: Your Honor, the Government offers
15 Government's Exhibit 356 both --

16 MR. AGNIFILO: No objection.

17 MS. HAJJAR: -- 356 and 356R.

18 MR. AGNIFILO: No objection to either one.

19 THE COURT: All right. 356 and 356R are received
20 in evidence.

21 (Government's Exhibit Numbers 356 and 356R so
22 marked and received in evidence.)

23 MS. HAJJAR: Thank you, Your Honor. May I publish
24 it?

25 THE COURT: Yes, you may.

Salzman - Direct - Hajjar

1727

1 MS. HAJJAR: This is Government's Exhibit --

2 Thank you, Your Honor.

3 THE COURT: Sure.

4 Q Ms. Salzman, I'm showing you Government's Exhibit 356R.

5 And can you explain what this exhibit is, what this

6 agreement is.

7 A So there are different parts of the agreement. As I
8 understood it, one part of the agreement is a nondisclosure
9 agreement saying that -- and -- and saying that if Audrey
10 speaks anything about this to anybody she owes me \$1 million
11 in damages, and then there's also that she was rightfully
12 transferring her property to me so -- and gave me the right
13 to release her collateral publicly. And a waiver that if
14 she's damaged at all during the process of her participation
15 in DOS for through her participation in DOS, that I have no
16 liability, and then was also some noncompete part of it that
17 I don't understand exactly what that is, but if she had
18 learned any material or secrets or valuable information in
19 the process of DOS that she wouldn't use that to earn an
20 income or benefit herself.

21 Q And what is the date of this agreement?

22 A February 10, 2017.

23 Q So turning to page, numbered Page 7.

24 Is that your signature?

25 A Yes.

Salzman - Direct - Hajjar

1728

1 Q Is that Audrey's signature?

2 A Yes.

3 Q And this paper that's titled nondisclosure/noncompete
4 agreement, is that -- is that you and your address and
5 Audrey?

6 A Yes.

7 Q And this page, that says assignment and transfer
8 agreements --

9 THE COURT: You have to just push it down.

10 MS. HAJJAR: Okay.

11 THE COURT: Well.

12 MS. HAJJAR: It gets cut off, Your Honor, in the
13 copy.

14 THE COURT: All right.

15 Q What is the date of that agreement?

16 A February 10, 2017.

17 Q Turning to the last page, whose signatures do you see
18 there?

19 A Mine and Audrey's.

20 Q And under Exhibit 1A, can you read some of the things
21 that are listed under Exhibit A property?

22 A Sure. 2017 Toyota, a Prius, all assets in Wells Fargo
23 checking, all assets in Wells Fargo savings, all assets in
24 Capital One account. There are three Vanguard Roth IRA
25 accounts that she transferred and personal home furnishes.

Salzman - Direct - Hajjar

1729

1 Q And your understanding of this contract was an
2 assignment of this property to you in the context of DOS?

3 A Correct.

4 THE COURT: Where did you receive this contract?

5 THE WITNESS: From Rosa Laura.

6 THE COURT: Rosa Laura.

7 THE WITNESS: Uh-huh.

8 Q At one point, Ms. Salzman, did you give instructions to
9 Audrey about assigning one of these accounts to another of
10 your DOS slaves?

11 A I did. I didn't want to personally take position of
12 her property because I thought that it was a conflict of
13 interest and I didn't want her to think that I had made a
14 lifetime commitment to her to get anything, so I asked
15 Charmel to hold it but essentially it's the same thing
16 because Charmel is a collateralized slave under me so in
17 essence if I wanted to take the property I could have taken
18 the property.

19 Q Can you flip to what's been marked for identification
20 as Government's Exhibit 414 and 414R?

21 A (Witness complies.)

22 Q Do you recognize these exhibits?

23 A Yes. This is the paperwork to add Charmel as a signer
24 on Audrey's Vanguard account.

25 MS. HAJJAR: Your Honor, the Government offers

Salzman - Direct - Hajjar

1730

1 both of those Exhibits, Government's Exhibit 414 and 414R
2 into evidence.

3 MR. AGNIFILO: No objection.

4 THE COURT: All right. Government's Exhibits 414
5 and 414R are received in evidence.

6 (Government's Exhibit Numbers 414 and 414R so
7 marked and received in evidence.)

8 MS. HAJJAR: May I publish it, Your Honor.

9 THE COURT: Yes, you may.

10 Q Showing you, Ms. Salzman, what's in evidence as
11 Government's Exhibit 414R. Is this the authorization you
12 were referring to?

13 A Yes.

14 Q And did this have the effect of adding a signatory to
15 this account?

16 A Yes, that's my understanding.

17 Q Were you a witness to this?

18 A Yes.

19 Q And what's here under aged acknowledgment?

20 A That's --

21 Q Is that --

22 A Charmel.

23 Q You said, Ms. Salzman, that you also recruited Jimena
24 and Carola into DOS.

25 A Yes.

Salzman - Direct - Hajjar

1731

1 Q How did that happen, can you explain that process?

2 A Jimena and Carola were in Mexico, so I did the same
3 process with them that I did with the others just over
4 Skype, so over video conference. Exactly the same way, I
5 told them that there was something I wanted to tell them. I
6 asked for collateral to keep the secret, they provided the
7 collateral, and then I shared the for four elements of
8 enrollment and they decided to join and submitted further
9 collateral.

10 Q And what did they give you as collateral?

11 A One of them gave me a video speaking about a family
12 member having an addiction problem that would have been very
13 damaging, hurtful to the family, the whole family.

14 Another one gave a video of an alleged affair that
15 they had had on their spouse. And then later they gave
16 additional collateral. I think one gave naked pictures,
17 another one signed over part of their business to me if they
18 were to default on their agreement. There were other
19 things, I can't recall what those were among them.

20 Q How did they give these items to you?

21 A Some they gave in person some they gave over Telegram.

22 Q Did you send those further along, did you send those
23 on?

24 A No, I held on to them.

25 Q Did you check the sufficiency of the collateral with

Salzman - Direct - Hajjar

1732

1 anyone?

2 A No. I asked -- you know what, at least one of two or
3 them were in Spanish and so I asked Loreta if she would
4 evaluate it for the weight and like to see if it was
5 sufficiently meaningful that it would secure the agreement.
6 And it was Loreta's sister so she -- I felt she would know
7 so I sent it to Loreta to check.

8 Q Who else did you recruit into DOS?

9 A Amanda and Charmel.

10 Q And who is Amanda, what was her background?

11 A Amanda's an attorney in California. I don't know as
12 much about her background but...

13 Q Did she provide collateral to you?

14 A She provided collateral to me, yes. She was also a
15 coach in my center in San Francisco as well.

16 Q What kind of collateral did she provide you?

17 A She provided an account of alleged abuse in her family
18 and then additionally sexually explicit photographs, a video
19 accusing her partner of abuse and that could have gotten --
20 I think something that could have gotten him fired from his
21 job and as well as something -- when later that could have
22 gotten her disbarred.

23 Q Were you under particular pressure to recruit Amanda?

24 A Well, I had scheduled the branding ceremony for the
25 first four that I had enrolled, so I wanted to give Amanda

Salzman - Direct - Hajjar

1733

1 the opportunity to be part of that. So I enrolled Amanda in
2 an expedited fashion to try to get her to be part of that
3 and she wanted to and so her enrollment was similar to mine,
4 it took place in like 2 or 3 days from enrollment to
5 branding.

6 Q And for each of these DOS slaves that you recruited did
7 you conceal the defendant's role in DOS?

8 A Yes, all of them.

9 Q Did your slaves --

10 THE COURT: Excuse me. What did you do with all
11 this paperwork when you received it?

12 THE WITNESS: I kept it for a period of time and
13 then -- but the -- the intent was that it would be held by
14 someone who was in charge of securing the collateral, which
15 was Rosa Laura, so eventually I transferred most of it to
16 Rosa Laura either in person or on a locked hard drive and
17 then at one point my hard drive was given back to me and the
18 last I saw it was in Mexico. I had it last in Mexico
19 with -- after Keith was arrested and then I came back to the
20 States without it.

21 THE COURT: How did you end up having a hard copy
22 of it on paper?

23 THE WITNESS: Went to Rosa Laura.

24 THE COURT: And to your knowledge where did she
25 keep it?

Salzman - Direct - Hajjar

1734

1 THE WITNESS: In her safe, but then I don't know
2 what she did with it after that.

3 THE COURT: The safe --

4 THE WITNESS: In her home.

5 THE COURT: -- in Albany?

6 THE WITNESS: Yes, in Albany was, understanding,
7 but then at some point she left Albany, went back to Mexico,
8 so I don't know if she took it with her or where it ended
9 up.

10 THE COURT: Go ahead.

11 THE WITNESS: I think the intent was that it would
12 be secure so that nobody would know where it was, so that it
13 wouldn't be released.

14 THE COURT: Or who had it?

15 THE WITNESS: Correct.

16 THE COURT: Go ahead.

17 MS. HAJJAR: Thank you, Your Honor.

18 Q Ms. Salzman, did your slaves recruit their own slaves?

19 A They did, yes.

20 Q And did they provide -- did their recruits provide
21 collateral to them which was shown you?

22 A Yes. Given to me ultimately.

23 Q Did Audrey recruit a slave?

24 A She did, yes.

25 Q And did any DOS slaves express concerns about the

Salzman - Direct - Hajjar

1735

1 collateral they submitted?

2 A Yes. Her -- yes, in particular the slaves that she
3 enrolled did.

4 Q Can you explain that further?

5 A She submitted something that she felt went against
6 something that she believed in, so she wanted to get it
7 back. And she specifically said I would like to -- please
8 don't turn it t in, I do want to have it back. There were
9 other -- I mean, Amanda enrolled somebody, too, who
10 submitted something and she afterwards was very upset that
11 she had submitted it and really struggled with that.

12 Q Ms. Salzman, did you ever review a spreadsheet in
13 connection with DOS enrollment?

14 A Yes.

15 Q Who prepared it?

16 A Rosa Laura kept track of the -- the enrollment and at
17 some point in time Loreta helped put it in Excel for us.

18 Q Where did you see it?

19 A I saw it in the -- we shared a DropBox folder, so it
20 was in an Excel Spreadsheet in the DropBox folder.

21 Q Can you look at what's marked for identification in
22 your binder as Government's Exhibit 357 and 357R, and 358.

23 A (Witness complies.)

24 Q Do you recognize this exhibit?

25 A Yes. This is -- it's an Excel Spreadsheet that has a

Salzman - Direct - Hajjar

1736

1 list of everybody who was enrolled at the time it was made.

2 Q And is Government's Exhibit 357R a redacted version of
3 Government's Exhibit 357?

4 A Yes.

5 MS. HAJJAR: I offer them, Your Honor,
6 Government's Exhibit 357, 357R and 358.

7 MR. AGNIFILO: Can we have just one second, Judge.

8 THE COURT: 357 -- yes, I will.

9 But 357 and 307R.

10 MS. HAJJAR: And 358.

11 THE COURT: Okay.

12 (Pause in proceedings.)

13 THE WITNESS: I don't see 358.

14 THE COURT: There --

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

17 THE COURT: Go ahead, yes. Go ahead.

18 MS. HAJJAR: Thank you, Your Honor.

19 Q Do recognize this exhibit?

20 A Yes.

21 Q What is it?

22 A It's a list of the first-line DOS masters and how many
23 enrollments they had in each line below them that we used
24 for readiness drills.

25 THE COURT: L1 is your line? Could you put that

Salzman - Direct - Hajjar

1737

1 back.

2 MS. HAJJAR: Yes, of course.

3 THE WITNESS: Yes, L1 is my line. L1 is all

4 the --

5 THE COURT: It's the master.

6 THE WITNESS: The masters yes.

7 THE COURT: On your level.

8 THE WITNESS: Correct.

9 THE COURT: Is there an objection?

10 MR. AGNIFILO: I don't know that we have the exact
11 one that the Government's offering.

12 THE COURT: Well, here, wait.

13 (Pause in proceedings.)

14 MR. AGNIFILO: No objection.

15 THE COURT: All right. Government's Exhibits 357,
16 357R and 358 are received in evidence.

17 (Government's Exhibit Numbers 357, 357R and 358 so
18 marked and received in evidence.)

19 MS. HAJJAR: Thank you, Your Honor. May I publish
20 them?

21 THE COURT: Yes, you may.

22 Q So showing you, Ms. Salzman, what's in evidence as
23 357R.

24 So this is one of the charts you reviewed?

25 A Correct.

Salzman - Direct - Hajjar

1738

1 Q Past enrollment?

2 A Correct.

3 Q Okay. And does this -- does this spreadsheet reflect
4 some of the participants in DOS?

5 A Yes.

6 Q And can you just -- can you explain what these columns
7 are starting with first that column that says, First?

8 A Sure. First it shows that it's the first line, so it
9 lists the first-line masters, Cami, Dani, Nicky, Loreta.
10 And then on the subsequent pages are the rest of the first
11 line. Rosa Laura, Monica, Allison, and myself.

12 (Continued on the next page.)

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L. Salzman - direct - Hajjar

1739

1 BY MS. HAJJAR:

2 Q And each of the names you read are the names of the first
3 line DOS masters that we discussed before?

4 A That's correct.

5 Q So, Cami in that column refers to Camila and Dani refers
6 to?

7 A Daniella Padilla.

8 Q Can you explain what this ID number column reflects, this
9 one here?

10 A ID number is the, in theory, it's the number of -- it's
11 the order that they were enrolled. I was grandfathered in as
12 number 8 so it's not completely in the order but I believe
13 other than myself it's in order of the order of enrollment.

14 Q So, Camila has -- the number next to her is 1.

15 A Yes.

16 Q And then Rosa Laura is 5?

17 A Correct.

18 Q And you're 8?

19 A Correct.

20 Q And does this reflect the slaves that are under you in
21 DOS?

22 A Yes, it does.

23 Q And which column is that in?

24 A The slaves that are under me are the column listed --
25 titled Second.

L. Salzman - direct - Hajjar

1740

1 Q What about the numbers in red that are at the top of the
2 column, the 8, 38, 43, 13, what does that reflect?

3 A It reflects the number of people who are enrolled in that
4 line at that time.

5 Q Can you explain that; so, what does the 8 signify?

6 A The eight of us first line and then 38 shows that we have
7 collectively enrolled 38 people under us, and those 38 people
8 in the next column had enrolled 43 people under them, and
9 those 43 people had collectively enrolled 13 people under them
10 in the column labeled Fourth.

11 Q So, at the time this spreadsheet was prepared what is the
12 total number that the spreadsheet reflects?

13 A 102.

14 Q The dates on the far left side, what do those dates
15 reflect?

16 A The date that the person was enrolled into DOS.

17 Q And so, looking at the names below you for Sarah and
18 Jimena, do those roughly correspond to the dates in which
19 Sarah and Jimena were recruited into DOS?

20 A Sarah's column is blank but next to her name on the right
21 is the date that she was enrolled.

22 Q Right here, right next to her name?

23 A Oh, yes, correct, and Jimena as well and, yes, that's
24 roughly the date they were enrolled.

25 Q What does the yellow highlighting mean, the asterisk at

L. Salzman - direct - Hajjar

1741

1 the top that says two asterisks means second payment is not
2 complete?

3 A It means they're not fully collateralized.

4 Q What does that refer to, second payment?

5 A It refers to the collateral, that they haven't given the
6 second collateral. So, they gave the first collateral for
7 secrecy but not fully collateralized in the vow.

8 Q And is it right that Camila has only one slave under her?

9 A Yes.

10 Q According to this spreadsheet?

11 A Yes.

12 Q I'm going to show you what's in evidence as Government
13 Exhibit 358.

14 Can you explain what this spreadsheet reflects?

15 A Yes, this spreadsheet reflects the number of individuals
16 in readiness, in the readiness drill. On the left it says M's
17 readiness, these are the people who are in the formal
18 readiness that was run by Keith. Our readiness reflected the
19 people who were in our readiness. So, when we ran our drills
20 we had additional people who were not formally in Keith's
21 readiness because we were preparing them to be part of the
22 formal readiness so the numbers sometimes were different.

23 Q Can you break this down a little bit?

24 A Sure.

25 Q What does it mean that there are different numbers listed

L. Salzman - direct - Hajjar

1742

1 in M readiness versus R readiness and what do the numbers and
2 letters mean here?

3 A So, when there was readiness each line was required to
4 check in. So, Keith would initiate readiness with a question
5 mark and the first line, what we would respond, RM, ready
6 master. So, he would list it with a question mark, we would
7 respond RM. When the entire first line had checked in, there
8 were eight of us in total in that line, so it was eight ready.
9 Okay. So, in each line there was a number of people who were
10 enrolled in that line and then there's how many are ready at
11 the time that the readiness drill is elicited, right, so -- or
12 initiated.

13 So, Cami when she would -- she'd check in, if you
14 see here it says 2R 1M, it is line 2, 2 ready, 1 slave
15 checking in master.

16 So, then if you go down, I drew over it, but if you
17 look at Loreta's it says 2R8M, that means second line ready
18 eight slaves master, eight slaves are ready in the second
19 line. So, each of us was accountable for each of our lines.
20 So, Cami only had one line so she would check in the second
21 line just one person. Daniella had two lines so she would
22 check in the second line five are ready, the third line looks
23 like six are ready and subsequently.

24 So, I checked in second line six were ready, third
25 line seven ready, fourth line two ready, that's how many I

L. Salzman - direct - Hajjar

1743

1 should be checking in on each readiness drill.

2 Q And the chart on the right, on the top right, do these
3 reflect the total numbers attributable to each of the DOS
4 masters?

5 A At that time, yes.

6 Q How many slaves do you have at that time?

7 A I had five. Oh, wait, I had six.

8 Q And what about their -- what about the total number under
9 you?

10 A Six plus nine, 15 at that time.

11 Q Sorry, Ms. Salzman, is there a 6 -- does L3 refer to the
12 slaves under them, if I zoom in on this?

13 A Oh, I see, the total; so, at this time -- oh, it's funny,
14 okay, sorry. I was looking on the left and counting. Based
15 on this column on the right it looks like I have 22 in my
16 group and then -- 22 total in my group under me.

17 Q How many does Cami have in contrast?

18 A Cami had herself and one, I had 21 plus myself.

19 Q So, although you were the last to join the first line,
20 your -- the slaves -- you had the most slaves under you at
21 this particular time?

22 A Yes.

23 Q Right?

24 A I did.

25 Q Can you explain why that was?

L. Salzman - direct - Hajjar

1744

1 A I think some of it was the way that I was enrolled in
2 such a quick amount of time, I had that was my understanding
3 of how the process worked and how easy the process could be.
4 I had the least experience and the least objections at the
5 time so I was the most enthusiastic when -- at that time when
6 Keith started pushing readiness and I think I have good
7 capacity to enroll other people in my ideas. So, all of that
8 kind of worked in my favor to be able to get a lot of people
9 quickly.

10 Q What about in contrast, Camila or Nicki, can you describe
11 their enrollment efforts?

12 A I think they're different for each person. Cami was not
13 very public in the community much at all and didn't have a lot
14 of relationships, so when you're talking about going out and
15 enrolling people that you're close with, she didn't have that
16 many people that she was close with. Also, she wasn't in a
17 leadership role or a coaching role or any of those things so I
18 don't know that a lot of people would have looked -- and she
19 was younger, I don't know that a lot of people would have
20 looked to her for somebody who they felt could help them the
21 most with their growth for their life.

22 And I'm not sure if that's the same exactly for
23 Nicki but Nicki wasn't as high in the organization -- in ESP
24 as me but generally my enrollment skills were better and I was
25 more enthusiastic about bringing more people.

L. Salzman - direct - Hajjar

1745

1 Q When you say growth in this context, do you include as
2 part of advancing within ESP?

3 A Well, your -- enrollment in your growth and your capacity
4 to enroll others in your ideas usually was reflective in how
5 far you were in ESP. So, there's growth -- there's your
6 growth and how that relates to your promotions in ESP but
7 particularly with the vow, it was a lifetime commitment of a
8 vow of obedience for the purpose of growth.

9 So, if Cami was going to enroll somebody and say I'd
10 like to be your master and help you with your growth, I don't
11 know that people would have seen her as being the person who
12 would be in that role or that they would look to and respect
13 to help them with that because she hadn't demonstrated that
14 she had that capacity.

15 Q At some point did you have your DOS slaves branded?

16 A Yes, the five of them.

17 Q And can you describe their branding ceremony?

18 A Yes. They had not known about each other. They knew
19 there were other slaves but they didn't know who the other
20 slaves were so I wanted to do an initiation ceremony for them
21 where they met each other and learned who their sisters were
22 in their circle.

23 So, I did that first, I invited them to my home and
24 I had told -- Rosa Laura told me when I joined the sorority
25 that there would be nudity as part of the sorority and I knew

L. Salzman - direct - Hajjar

1746

1 that in advance and I had told them that as well. So, they
2 came to my house, I asked them to come in staggered times so
3 they wouldn't know who each other were and I put them in
4 different rooms of my house and I asked them to remove their
5 clothes and blindfold themselves and then I led them
6 downstairs to my living room where they sat in a circle and
7 then they were able to take off the blindfold and see each
8 other, who each another were, and I did a candle lighting
9 ceremony with them, you know, to initiate them into their
10 circle.

11 Then they got dressed. We all had dinner and we
12 went over to Allison's house to do the branding. They took
13 about an hour putting on their stencils, figuring out where
14 they wanted the brands, etc., and then we went from there and
15 their branding ceremony was similar to what I described in
16 mine except they were fully naked all of them except me and
17 Danielle.

18 Q What did you tell them about the brand?

19 A I told them it was a symbol, an abstract symbol.

20 Q What about the size?

21 A I had told them originally my understanding was the brand
22 was supposed to be one inch by one inch and that's what I
23 believed it would be. When I was branded there had been an
24 error that was made somewhere and my brand is much larger than
25 that, it's probably like two and a half inches by three inches

L. Salzman - direct - Hajjar

1747

1 and it was supposed to have been corrected by the time my
2 girls were to be branded but it wasn't and so their brand is
3 larger than that as well, I'm not sure exactly the
4 measurements but it is bigger than an inch by an inch, but I
5 told them it was going to be an inch by an inch believing
6 that's what it was, that's the size that all the sisters in my
7 circle, the first line DOS masters all have an inch by an inch
8 and myself and only a few have a much bigger one and then
9 Sarah and Audrey's was much bigger and the others in their
10 circle were bigger than the inch by the inch?

11 Q Who was the first to be branded?

12 A Jimena.

13 Q And was the branding filmed?

14 A Yes, they all were filmed.

15 Q Who filmed Jimena's branding?

16 A I don't recall specifically who filmed Jimena but I think
17 it was Sarah because Keith texted me in the middle of it and
18 she saw the text so after that they weren't filmed on my phone
19 anymore or soon after that they weren't filmed on my phone
20 anymore.

21 Q And the text you received, what was that regarding?

22 A It was regarding a meeting of the first line DOS masters
23 that Keith held in the middle of the branding ceremony, so I
24 had to stop the branding ceremony to go to that meeting and
25 then come back.

L. Salzman - direct - Hajjar

1748

1 Q How did Jimena react?

2 A Jimena, it was really very overtly emotionally
3 expressive, like she responded very expressively to the pain.

4 Q What does that mean?

5 A Like she was squealing and screaming and it looked
6 horrendous. It was -- she demonstrated what she felt and her
7 reaction was particularly intense.

8 Q At some point did she ask for some kind of cloth?

9 A Yeah, she asked for or somebody offered her something to
10 bite down on.

11 Q Did it look scary?

12 A It looked really scary. What Jimena was demonstrating
13 looked very scary. It was frightening to see, it scared the
14 other girls.

15 Q You said that ceremony was interrupted at some point;
16 what happened?

17 A I had to leave to go to the first line meeting so, and
18 Carola wanted to leave to go feed her daughter, her baby and
19 so Carola and I left. I went -- I dropped her off to feed her
20 daughter and then I went to the first line DOS meeting and
21 then like an hour later we went back.

22 Q Who was next to be branded after Jimena?

23 A Audrey went second.

24 Q And after that?

25 A Sarah.

L. Salzman - direct - Hajjar

1749

1 Q Your DOS slaves, were each of their branding ceremonies
2 filmed?

3 A Yes.

4 Q What was Sarah's branding like, can you describe that?

5 A Sarah was -- like Sarah did and told the other girls as
6 well to use like yoga breathing to help through the process so
7 she was much quieter, she did her yoga breathing, she handled
8 it I mean comparatively much better than the other girls did
9 and I was very proud of her at the time. In all of the
10 branding ceremonies there was, you know, some degree of
11 laughing and joking and different things to try to make it
12 seem a little less awkward and -- but I was, you know, I
13 coached them all through the process. So, there was that in
14 the branding ceremony, me encouraging her, touching her,
15 helping her through the process.

16 Q Who did the branding?

17 A Danielle.

18 Q How do you feel about participating in the branding
19 ceremony now?

20 A I mean I feel like it was the start of the end of all of
21 my relationships with these people, like it -- I don't feel
22 good that I was dishonest about Keith's involvement or the
23 initials, like I don't think it was right to brand his
24 initials on people without them knowing that that's what it
25 is -- what it was and at the time I didn't view it as -- that

L. Salzman - direct - Hajjar

1750

1 they were doing it only because I told them to do it or that
2 they felt that they had to do it but ultimately they were my
3 slaves and they were under a collateralized vow of obedience
4 to me and if they didn't obey, their collateral was subject to
5 be released, that was the agreement, and so had they decided
6 they didn't want to do it or there was something about it that
7 wasn't for them anymore, the notion that they really could
8 have chosen out of it I think is really one that I hadn't
9 considered at the time; like at the time I thought it was
10 consensual and they wanted to do it but even if they didn't, I
11 was their master and I told them to and you don't get to
12 say if you tell them they have to have sex with somebody or
13 have somebody else's child they have to do it but somehow they
14 don't have to get branded if they decide they don't want to.

15 Q At the time that the defendant told you that about Sarah,
16 about having sex with someone or having someone else's child,
17 had she provided collateral?

18 A Yes.

19 Q Was she recruited into DOS at that point?

20 A Yes.

21 Q What happened after the branding ceremony?

22 A We went back to my house and I took a group picture and
23 then they went home.

24 Q Were photographs taken of the group?

25 A Yes, I took a group photograph -- I took a group picture

L. Salzman - direct - Hajjar

1751

1 of them that night immediately following their branding and
2 then later that week they met a few times and I asked them to
3 take naked pictures of themselves and send them to me similar
4 to what we did in my circle at every one of our meetings.

5 Q Did you give them any instructions about the photographs
6 they were to take after the branding?

7 A Yes, we had -- my group was meeting three times a week
8 and we were taking these pictures and there was -- when we got
9 feedback about changing it, we incorporated that feedback and
10 sometimes we had left the meeting and had to rearrange our
11 schedules to make it possible to get back together again and
12 retake the picture and the girls that I had enrolled all lived
13 in separate areas so specifically I wanted them to have that
14 experience so I told them, I mean initially that they were to
15 be fully frontally nude, the brand should show, you know, and
16 they should appear happy in the pictures or I may not have
17 told them happy initially but I corrected them and they had to
18 get together later and rearrange their schedules to retake the
19 picture and look happy.

20 Q When you say you thought it was important for them to
21 have that experience, do you mean to replicate that, retaking
22 the photograph if you didn't look happy?

23 A To incorporate feedback that your master gave you and
24 that was the feedback that I gave them, specifically to look
25 happier.

L. Salzman - direct - Hajjar

1752

1 Q Can you explain what incorporating feedback means, what
2 that phrase means?

3 A It means you're told something that you didn't perceive
4 or you would have already done it, that's important, and so
5 you fix it. Incorporate it is you make that change.

6 Q So, what was the change you requested for this
7 photograph?

8 A I requested them to look happy.

9 Q And did they retake the photograph looking happy?

10 A Yes.

11 Q Did you require them to rearrange their schedules for
12 this?

13 A Yes.

14 Q Can you explain that?

15 A Well, we had done that several times in my first line
16 group based on feedback and requests that Keith had made or
17 instructions we had been given and so my group had done that a
18 number of times and I thought that he must have been doing it
19 for a reason, that it was somehow important to prioritize this
20 over other things as we had done and because they lived in the
21 other outlying areas they wouldn't have that opportunity to do
22 that, to make that choice or to have that experience again for
23 another three or four months, so I wanted them to have that
24 experience at least once so I required them to do that.

25 Q Again, when you say, "have that experience," what are you

L. Salzman - direct - Hajjar

1753

1 referring to?

2 A Of prioritizing my request over everything else they were
3 doing.

4 Q To make them rearrange their schedule in order to do it?

5 A Yeah.

6 Q After your DOS slaves were branded did you ask them to
7 continue taking photographs of the brand?

8 A Yes, the instruction was that they would take photographs
9 every day and send them to me and I sent those photographs to
10 Danielle who was in charge of keeping all of the brand
11 photographs.

12 Q You gave them instructions to send you the photographs
13 every day?

14 A I did every day and then after six weeks I told them they
15 could do it once a week and eventually they stopped sending
16 them. I think when things became public we stopped doing
17 that, possibly earlier.

18 MS. HAJJAR: Your Honor, can I show something to the
19 witness for identification only?

20 Thank you.

21 Q Ms. Salzman, I'm showing you what's marked for
22 identification as Government Exhibit 429.

23 Do you recognize this exhibit?

24 A I believe it's Audrey's brand.

25 Q And does it comprise many photographs of the brand?

L. Salzman - direct - Hajjar

1754

1 A Yes, it comprises the photographs from her branding
2 through the initial six weeks.

3 MS. HAJJAR: Your Honor, the government offers
4 Government Exhibit 429.

5 MR. AGNIFILO: We have no objection, Judge.

6 THE COURT: Government Exhibit 429 is received in
7 evidence.

8 MS. HAJJAR: Thank you, Your Honor.

9 (Government's Exhibit 429 so marked in evidence.)

10 Q So, the images in this exhibit, Ms. Salzman, what are
11 they?

12 A This is Audrey's brand which is Keith's initials.

13 Q And are there a number of photographs in this exhibit?

14 A Yes, there are.

15 Q What does it reflect over time?

16 A It reflects how the brand healed over time.

17 Q Can you show the members of the jury so -- where is the
18 brand, Audrey's brand located physically on the body?

19 A On her bikini line.

20 Q Can you show the members of the jury where the
21 defendant's initials were on Government Exhibit 429?

22 A Yes, so this is K and then that triangle is the triangle
23 of the A with the A and then the line, the middle line of the
24 A becomes the back of the R and the R is reversed, it's
25 backwards (indicating.)

L. Salzman - direct - Hajjar

1755

1 Q And what initials does that stand for, KAR?

2 A KAR, Keith Alan Ranieri.

3 Q Now, does your brand and the brand of the other first
4 nine slaves look like this?

5 A Mine is upside down, mirror image of that.

6 Q Why?

7 A Because it was the first line, you could see that it was
8 his initials in all the first line masters and everybody below
9 the first line had it flipped upside down and reversed I think
10 to conceal it.

11 Q To conceal what?

12 A The initials.

13 Q So, in your brand the fact that it contains the
14 defendant's initials is more visible, more readily apparent
15 than here?

16 A More visible, yeah, if you're just looking at it directly
17 but I always thought that that was suspicious because if you
18 have the backwards one and you look at in the mirror, which is
19 how you look at yourself all the time, it's the right way so I
20 thought for sure they were going to see it but...

21 Q But they didn't?

22 A No, and that was also why I was raising questions to
23 Keith about it but, yes, correct, they didn't.

24 Q And did you ever ask permission to explain the initials,
25 did you ask permission from Keith to disclose to your slaves

L. Salzman - direct - Hajjar

1756

1 the brand?

2 A Not to explain the initials but I did -- I found out
3 later that some people's slaves did know about his involvement
4 and I wanted mine to know and I did ask for permission and he
5 said maybe at some point but didn't give the permission so I
6 couldn't tell them. So, I mean -- but I did have permission
7 to read from (sic) them the book and so I told them that the
8 supreme master had written the book for us and also that if we
9 succeeded in our enrollment goals, we would qualify for
10 additional curriculum and I was hoping that they would be able
11 to connect the dots on that because it is almost exactly how
12 the other organizations work and Jimena did. So, Carola knew
13 about the initials and the brand and Jimena knew about Keith's
14 involvement.

15 Q Did the others?

16 A No.

17 Q Ms. Salzman, these photographs depict the brand over time
18 as it healed?

19 A Yes, correct.

20 Q And for what period of time was Audrey sending you these
21 photographs?

22 A I think these reflect the first six weeks.

23 Q Did she send these every day to you?

24 A Yes, they all did.

25 Q Did you send them anywhere else?

L. Salzman - direct - Hajjar

1757

1 A To Danielle.

2 Q Why?

3 A I was told Danielle was the one who kept track of them.

4 Q This is the last image in that series.

5 About how long after the initial branding was this
6 image sent to you?

7 A This is probably up to six weeks.

8 Q You testified about acts of care?

9 A Yes.

10 Q And work that your slaves performed for you?

11 A Yes.

12 Q Was their work considered part of the vow of obedience to
13 you?

14 A Yes.

15 Q And the monthly collateral, you testified that you
16 submitted it and your slaves did, was that considered part of
17 the vow as well?

18 A It was considered part of keeping collateral current but,
19 yes, when I told them to keep it current it was under the vow
20 of obedience.

21 Q Did your slaves also track enrollment in DOS in some
22 form?

23 A They did, yes.

24 Q Can you explain that?

25 A There were a number of things that I asked them to keep

L. Salzman - direct - Hajjar

1758

1 track of, who they were enrolling and in which stage of
2 enrollment each of the candidates were, when they expected
3 that those candidates would each move to the next stage of
4 enrollment and be fully collateralized in the vow and then
5 there were other things I asked them to track; their acts of
6 care, I asked them to track that they were doing their daily
7 act of self-denial, their good morning-good night and anything
8 else they were checking in on I asked them to keep track of.
9 I didn't necessarily need to see it but I wanted them tracking
10 it.

11 MS. HAJJAR: Your Honor, may I show the witness
12 something for identification only?

13 THE COURT: Go ahead.

14 Q Ms. Salzman, I'm showing you what's marked for
15 identification as Government Exhibit 425-R.

16 Do you recognize this?

17 A I don't recognize this specific page but this is -- the
18 subsequent pages are things that Audrey put together to track
19 the things that I just said and the first page indicates the
20 different stages of enrollment. So, likely it was Audrey
21 tracking all of those stages of enrollment.

22 Q And the initials on the left-most side, did those
23 initials correspond to the first initial of your slaves?

24 A Yes, they did.

25 MS. HAJJAR: Your Honor, the government offers

L. Salzman - direct - Hajjar

1759

1 Government Exhibit 425-R into evidence.

2 MR. AGNIFILO: One second, Judge.

3 (Pause.)

4 MR. AGNIFILO: Judge, may we approach for a second?

5 THE COURT: All right. You may approach.

6 (Continued on next page.)

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Sidebar

1760

1 (The following takes place at sidebar.)

2 MR. AGNIFILO: So, we got this this morning and we
3 haven't really had a chance to look at it. My concern is if
4 this witness didn't make it, I don't know whether the witness
5 looked at it in some official capacity, otherwise it seems
6 like it is a document made by Audrey.

7 I don't -- I mean since I haven't really had a
8 chance to look at it because we've been on direct all morning,
9 we just got it this morning, what I'd like, maybe the timing
10 contributes to this, if I could have ten minutes to look at it
11 over the break? I'm not going to stand on ceremony about it,
12 I want to make sure there's no hearsay in here or something
13 that's problematic.

14 MS. HAJJAR: I have no objection to taking ten
15 minutes. This was provided to Ms. Salzman by her slave as a
16 requirement of tracking enrollment within that circle. She's
17 identified who these initials correspond to and what's in the
18 chart and she can do so with more detail.

19 THE COURT: Well, we'll take our break and we'll
20 come back.

21 MR. AGNIFILO: I mean if you want to bring -- I just
22 don't know what -- what I heard her say, maybe I'm looking at
23 the whole picture, this is something Audrey made and she
24 wasn't fully familiar with it. If you have other questions to
25 ask her, that's fine.

Sidebar

1761

1 MS. HAJJAR: That's fine, I can ask her more
2 questions about what are the circumstances were under which
3 she reviewed this.

4 THE COURT: We're going to take a break in 10
5 minutes anyway.

6 MR. AGNIFILO: Do you have anything -- I don't want
7 to mess your schedule up. Do you want to -- what do you want
8 to do? Do you want to take our break now?

9 THE COURT: Would you like to take the break?

10 MS. HAJJAR: I'm fine to take the break now. Thank
11 you, Your Honor.

12 THE COURT: That's fine, sure.

13 (End of side-bar.)

14 (Continued on next page.)

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1 THE COURT: All right. We'll take our mid-afternoon
2 break now.

3 All rise for the jury.
4 (Jury leaves courtroom.)

5 THE COURT: The witness may stand down. Please do
6 not discuss your testimony with anyone.

7 (Witness steps down and leaves courtroom.)

8 THE COURT: All right. We'll take a ten-minute
9 break. Thank you.

10 MR. AGNIFILO: Thank you, Judge.

11 (Time noted: 3:25 p.m.)

12 (Recess taken.)

13 (Continued on next page.)

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Proceedings

1763

1 (Defendant enters the courtroom.)

2 THE COURT: What's that?

3 MR. AGNIFILO: I haven't had a chance to read it.

4 THE COURT: All right, thank you. Let's call the
5 witness back in. And we'll get the jury.

6 And so you are going to go until the end of the day,
7 Ms. Hajjar?

8 MS. HAJJAR: Yes, Your Honor.

9 THE COURT: Okay.

10 Let's get the jury, please.

11 (Whereupon, the witness resumes the stand.)

12 (Jury enters the courtroom.)

13 THE COURT: Please be seated.

14 All right, Ms. Hajjar, you may continue the direct
15 examination of the witness.

16 The witness is reminded she is still under oath.

17 Is there any objection to Government Exhibit 425R?

18 MR. AGNIFILO: No, Your Honor.

19 THE COURT: All right, Government Exhibit 425R is
20 received in evidence.

21 (Government Exhibit 425R, was received in evidence.)

22 MS. HAJJAR: Thank you, Your Honor.

23 If I could publish it to the jury.

24 THE COURT: All right. Go ahead.

25 (Exhibit published.)

Salzman - Direct - Hajjar

1764

1 DIRECT EXAMINATION (Continued)

2 BY MS. HAJJAR:

3 Q Ms. Salzman, I'm showing you what's in evidence as
4 Government Exhibit 425R.

5 This is a spreadsheet to track the stages of
6 enrollment and how much time they anticipated each person
7 would be in each stage of enrollment.

8 And so at the top when it says: Prospect's first
9 guarantee approach, Pitch to saying yes, Why first said yes,
10 what does that mean?

11 A That means the prospect is who do you have in mind to
12 approach to join.

13 First guarantee means that they submitted the
14 initial collateral for secrecy.

15 Pitch to saying yes is the -- when you're in the
16 process of telling them about the four aspects to the vow.

17 That the lifer said yes, which is the stage four
18 column, means that they've heard the four aspects of joining,
19 which is The Vow of obedience, the master slave concept, the
20 collar and branding and they said, yes, that they want to join
21 after hearing that.

22 And then stage five is they have fully
23 collateralized.

24 Q And they are six rows underneath those headers.

25 What do each of those -- those rows each a DOS slave

Salzman - Direct - Hajjar

1765

1 of yours?

2 A Yes.

3 Q Did Audrey prepare this at your direction?

4 A Audrey offered to come up with a way to help track it,
5 and I said, yes, that would be helpful to me.

6 Q Did you instruct that there needed to be tracking?

7 A Yes, I asked him to track a number of different things.

8 Q And so what is -- what does this page of Government
9 Exhibit 425R show, the second page, it says enrollment status
10 tracking, what does this reflect?

11 A It shows the different people that each of my slaves had
12 in the stages of enrollment and when they anticipated each --
13 the dates that they would be moving through the different
14 stages.

15 Q And are those dates reflected at the top?

16 A Yes.

17 Q At the bottom where it says: Totals lifer, all including
18 M, what does that mean?

19 A It meant how many people that we would have fully
20 collateralized in The Vow by each of those dates, including
21 myself.

22 So it was how many we would have in our entire
23 group; myself included, my slaves included, and their
24 enrollments, and anyone below them included.

25 Q So at 45, the lower right-hand column would be by

Salzman - Direct - Hajjar

1766

1 July 3rd that corresponds to dates, in other words?

2 A That's what they were striving for, yes.

3 Q Can you describe what this page reflects in group
4 accountability and the chart that's underneath that?

5 A I believe this is -- these are the different things that
6 they were tracking. So they were tracking their enrollment, a
7 discipline that they were doing. I don't know if that was
8 daily acts of self-denial or weekly active care.

9 I had asked them to notify me, so that was they were
10 tracking. They were updating their goals, sending pictures
11 and brands, doing their active care, and being accountable to
12 the data in the spreadsheet, and they were adding their
13 penances as a personal list.

14 And then for June, when they said "weight," weight
15 was another word that we used for collateral.

16 So where they're saying monthly guarantee, that
17 means the monthly collateral. And that they were reporting to
18 me that they had submitted it. That they were fully
19 collateralized and that were ready. So those were the things
20 they were checking on.

21 Q And the "M" refers to you as master?

22 A Yes.

23 Q The highlighted box here, take one spoon per person who
24 fails.

25 Do you know what that refers it?

Salzman - Direct - Hajjar

1767

1 A Audrey called it a spoon, but I think she was taking
2 paddle penances if they failed for all the failures of the
3 people in her group.

4 She had brought it to me and asked me -- she told me
5 she wanted to do it and asked me if I was okay with her to do
6 that and I said, yes.

7 Q Was that something you suggested?

8 A I suggested that they take -- that they figure out how
9 they wanted to deal with the readiness failures, and that I
10 was taking on penances for their failures.

11 So when they had failed at readiness, I shared -- I
12 was taking on penances for them. So they suggested that they
13 would take the same penance I was taking. So once I
14 suggested -- I told them I was taking paddlings for all of
15 their failures, then they wanted to take that as their penance
16 as well.

17 And then Audrey in this case was taking additional
18 paddlings for the failures of her group members.

19 Q Did you continue to recruit other DOS slaves after the
20 branding ceremony?

21 A One more.

22 Q Who?

23 A Charmel. I recruited her the week after the branding
24 ceremony.

25 Q And did you recruit -- was the process of recruiting her

Salzman - Direct - Hajjar

1768

1 similar to the recruitment process for the other slaves?

2 A Yes, always the same.

3 Q What did Charmel submit as collateral?

4 A Charmel submitted a letter to her children that would
5 have effectively severed their relationship.

6 Q How did you communicate with your DOS slaves?

7 A Through Telegram chats, program, the app -- it's the app
8 on the phone.

9 Q Miss Salzman, can you flip in your binder to Government
10 Exhibit 432 and 432R.

11 A Yes.

12 Q Do you recognize these exhibits?

13 A Yes, these are my Telegram chats with Audrey.

14 Q And is 432R is a copy of Government Exhibit 432 with
15 certain names redacted?

16 A 432R is 432 with names redacted.

17 Q Does it appear to be the same, those exhibits?

18 A They appear to be the same, yes.

19 MS. HAJJAR: Your Honor, the government offers
20 Government Exhibit 432 and 432R.

21 MR. AGNIFILO: We have no objection.

22 THE COURT: All right, Government Exhibit 432 and
23 432R are received in evidence.

24 (Government Exhibit 432 and 432R, were received in
25 evidence.)

Salzman - Direct - Hajjar

1769

1 (Exhibit published.)

2 Q Miss Salzman, I show you the first page of Government
3 Exhibit 432R.

4 Are these are your Telegrams chat with Audrey.

5 Are they screenshots of that chat?

6 A Yes.

7 Q The Telegram chat is something on your phone?

8 A Yes.

9 Q Is that right?

10 A Correct.

11 Q And whose phones are these screenshots from?

12 A Audrey's.

13 Q And how can you tell?

14 A Because they're conversations between me and Audrey that
15 only existed on my phone and her phone.

16 And as evidenced by my picture in the right-hand
17 corner, I'm the one who is speaking to the recipient. So
18 these are on the recipient phone, which is Audrey's.

19 Q Can you tell based on the color of the messages which
20 messages were sent and which ones were received?

21 A Yes. Always the person who is -- on your own phone the
22 message is green, and the person writing to you is white.

23 So I'm writing to her in white, and she's writing
24 back to me in green.

25 Q So the first message: Amanda and I want to do our,

Salzman - Direct - Hajjar

1770

1 quote, mega penance from our readiness failure while we are in
2 San Diego with you. Can you advise on what method instrument
3 we should use.

4 That's Audrey to you?

5 A Correct.

6 Q And your response, can you just read your response,
7 please?

8 A Go to the sex store and get a paddle, which is what my
9 group did. And they have leather ones. I sent Jimena a
10 picture.

11 There's one in the mission by your house, I think.
12 Mission is just an area of San Diego. I mean San Francisco.
13 Sorry.

14 Q Did you send a photograph of the paddle?

15 A I did.

16 Q Can you explain the context for this chat? Why were you
17 in San Diego?

18 A I was in San Diego -- I was invited, Allison was in a
19 play in San Diego, and I went to see her in the play. And I
20 invited Audrey and Amanda to come with me.

21 Q And when was this approximately?

22 A In April of 2017.

23 Q Audrey uses -- capitalizes the "Y" in you?

24 A Correct.

25 Q Why does she do that?

Salzman - Direct - Hajjar

1771

1 A Because I'm her master and we capitalize all the
2 pronouns.

3 Q And what was this paddling of penance for?

4 A Failure of readiness.

5 Q Which meant what exactly?

6 A That they failed to get all of the people in their line
7 reporting in for readiness in the one-minute time from.

8 Q To your knowledge, did Audrey, in fact, get a paddling
9 penance for failing?

10 A Yes, she did.

11 Q How do you know that?

12 A Because I saw her take it. I was in the room with her.

13 Q Were there other times where -- that Audrey was paddled
14 or paddled others?

15 A Yes.

16 Audrey and Charmel took a paddling penance that I
17 was unaware that they were going to take it at the time, but
18 they sent me videos of it.

19 Q So on page 2 of Government Exhibit 432, this is Audrey's
20 text: We are here at the garden, whenever you're ready, we're
21 happy to meet you, whenever it is most convenient.

22 And your response is: Are you rushing me?

23 A Correct.

24 Q Can you explain the context for this chat?

25 A Yes.

Salzman - Direct - Hajjar

1772

1 So we had arrived in San Diego, and Allison started
2 pointing out areas where my slaves were failing that would be
3 acceptable to her in her with her slaves were failing at.

4 So I was getting a lot feedback from Allison that I
5 was not doing a good job as a master. And so when I received
6 the text from Audrey about at being at the garden, whenever
7 they're ready, Allison told me that she would have said are
8 you rushing me, so I wrote: Are you rushing me?

9 I wanted to show Allison that I was a good master
10 and willing to discipline my slaves and teach them how to be
11 good slaves.

12 Q And the next message you write back: The stories and
13 justifications need to stop. You believe your own BS and it
14 makes and keeps you weak.

15 A Uh-huh.

16 Q Sorry, master.

17 Is this the tone you would use with you DOS slaves?

18 A At times.

19 And those are things, too, that Keith would say to
20 us. You know, so that we needed to stop making stories and
21 stop making excuses and stop making justifications. That we
22 were making things harder and more difficult for him and -- by
23 not being better at things.

24 And as time progressed that I was in DOS, it was
25 more and more strict in those ways, and so I was more and more

Salzman - Direct - Hajjar

1773

1 strict with them as well. Feeling that he felt that we were
2 making things harder for him, and I would go and relay they
3 were making things harder for me with him. But I didn't tell
4 them about him.

5 Q Looking at page 3 of Government Exhibit 422.

6 Spoke too soon. She's having another freak out.
7 Asked me to not submit her collateral and to back out. I
8 talked her down. She's processing through their reactions
9 faster. I think she's coming around.

10 What is -- this is Audrey's message to you?

11 A Yes.

12 Q And when she says that this person's having another freak
13 out, asked me not to submit her collateral, what does that
14 mean?

15 A The person -- this person joined, and then would say I
16 don't -- I don't want to be a member any more, but then would
17 say that she did. She did want to stay. She just had a
18 reaction that she was over it now and she wanted to stay. And
19 that happened a few times.

20 So when she said she's having another freak out, it
21 was her having an emotional reaction and not want to stay.
22 And also she had submitted an additional collateral and she
23 wanted it back.

24 Q Did she ask for it back?

25 A Yes, she asked Audrey for it back.

Salzman - Direct - Hajjar

1774

1 Q Was she given it back?

2 A No.

3 Q This text on page 4 of Government Exhibit 432.

4 Secondly, she made a life commitment. The fact that
5 she thinks she can back out because she is it uncomfortable is
6 exactly the reason we are asking her to do this assignment.

7 Who sent this message?

8 A I did.

9 Q And are you referring to the DOS slave that was just
10 being discussed?

11 A Yes, I am.

12 Q You mentioned before that the -- that weight was used as
13 collateral sometimes.

14 A Yes.

15 Q So looking at page 6 of Government Exhibit 432.

16 The idea of weight is to leverage your capacity to
17 stick to your growth program. The fact that you got scared
18 immediately and want to quit is exactly the reason for the
19 weight.

20 What does "weight" mean in this context?

21 A The collateral.

22 It means the idea of collateral is to leverage your
23 capacity to stick to the program. The fact that you got
24 scared immediately and want to quit is exactly the reason for
25 the collateral so that you don't quit, you can't quit.

Salzman - Direct - Hajjar

1775

1 Q On page 8 of Government Exhibit 432 you write:

2 As far as I'm concerned with Kristin, she is in.
3 She already decided. Telling her herself she's still deciding
4 is a type of way she keeps the back door open.

5 What does that mean, "the back door open"?

6 A The back door open is the third option I was talking
7 about with the women earlier. That women feel that they can't
8 get out of things. And we call that having back door.

9 Q And what was the purpose in this context when you say,
10 She keeps the back door open. What's the purpose of the
11 collateral?

12 A So that there is no back door option any more.

13 Q There's no way to get out of it?

14 A No.

15 Q The second message on this page: This is a type of
16 tantrum.

17 Is that word used frequently?

18 A Yes.

19 Q And can you explain how and why you use that word? That
20 word "tantrum"?

21 A Yeah. Because -- well, Keith taught us that these were
22 types of emotional tantrums. That we could throw a tantrum,
23 that we could have an overt emotional reaction to something
24 and then get off the hook for that thing because of the
25 emotional reaction. That people would let us off the hook for

Salzman - Direct - Hajjar

1776

1 that.

2 And so we came to see those things, somebody having
3 an emotional reaction to something and wanting to not do it as
4 a type of tantrum to try to get off the hook.

5 Q In this context, the emotional -- when you say emotional
6 reaction, in this context, are you referring to someone not
7 wanting to -- their collateral -- not wanting to submit their
8 collateral?

9 A Yes, and them wanting to leave.

10 Q This is on page 9 of Government Exhibit 432. You say:
11 So I recommend when you get here talking to her about that.
12 Don't mention the guarantee.

13 What did you mean?

14 A I meant that to discuss with her the fact that she said
15 she wanted to do something and then she's trying to get off
16 the hook for it. And then wanting to do it again. Like I
17 want to, I don't; I want to, I don't. Discuss that with her
18 but don't get into the collateral yet. Get her through that
19 part and then we'll discuss what happens to the collateral.

20 Q Why?

21 A Because it -- it was kind of a one step at a time thing.
22 But get her through the first part, then you get her through
23 the second part.

24 Q Explain that further, one step at a time thing?

25 A Like that she was having emotional reaction not want to

Salzman - Direct - Hajjar

1777

1 go do this, which she had had before, independent of the
2 collateral. And was also having a reaction of wanting the
3 collateral back.

4 And I saw it as a two-step process. Like first
5 let's help her understand why she wanted to do this in the
6 first place, or connect with what she wanted out of it in the
7 first place.

8 And then talk to her about the collateral, which is
9 precisely what she put down because she wanted that thing in
10 the first place.

11 Q Why defer mentioning collateral?

12 A I thought it was too much at once. She was having
13 reaction and it was progressive.

14 But it was inductive as well. I said to Audrey:
15 Give me the collateral any way. Turn it in any way. She said
16 she doesn't want it, but she gave it with the intent -- at the
17 time she gave it, she gave it with the intent to give the
18 collateral, we're going to uphold that part.

19 Like sometimes she says yes; sometimes no; sometimes
20 yes; sometimes no. We're going to honor the part that's yes.
21 She gave the collateral when she meant yes. Give it to me and
22 we're going to hold it and talk to her and see if she wants to
23 we're stay or not. But ultimately the collateral is not
24 subject to be released. But see if she wants to say first.

25 Q So it could be released back to her?

Salzman - Direct - Hajjar

1778

1 A I'm sorry, it wasn't going to be given back. It wasn't
2 going to be given back.

3 Q On page 10 of Government Exhibit 432, Audrey writes she
4 writes -- that this person had asked whether her final
5 collateral was submitted.

6 And on the following page you say: But turn in her
7 collateral any way.

8 A Yes.

9 Q I believe she's staying, but even if she doesn't, she
10 shouldn't get it back.

11 A Exactly.

12 Q Given with the intent to stay.

13 Is that what you're referring to?

14 A That's what I'm referring to, yes.

15 Q The bottom of the following page, page 12, you say:
16 She's asking because she's run by her viscera, but she knows
17 it's bad to back out. She's just feels scared.

18 What's her viscera?

19 A She wants to do what's more comfortable. Viscera is what
20 feels better.

21 Q And when she's asking, because she's run by her viscera.
22 In plain English, what does that mean?

23 A It means I was looking at it like this: That she -- that
24 she had this ideal that she wanted to grow, but it may not
25 always be comfortable to grow.

Salzman - Direct - Hajjar

1779

1 And so you put down the collateral so that you'll
2 grow even when not it's comfortable. But right now she's
3 feeling uncomfortable, so she's saying I don't want this.

4 But that was the whole reason we did it in the first
5 place. We joined this organization in this collateralized vow
6 to help us when we felt uncomfortable push through and stay
7 consistent.

8 So I was looking at it like that; like, so right now
9 she's in the uncomfortable part saying I don't want this, but
10 when she's not feeling uncomfortable, she's this is something
11 that I want.

12 And so I was saying she's -- right now she's asking
13 because she's feeling uncomfortable, but she knows it's bad to
14 back out because we discussed it several times, and she agreed
15 that she didn't want to be the kind of person who backed out
16 when she got uncomfortable. So she's feeling scared right now
17 and that's what's going on, and that's how I was framing it to
18 Audrey.

19 And that's why I was making the decision to continue
20 to keep the collateral because when she wasn't in the moment
21 of feeling uncomfortable, she kept say she did want to stay.

22 Q Do you have a different view of this exchange now?

23 A Yes. And also because subsequently she said every time
24 she talked to me she felt like I kept talking her back into
25 things she didn't want to. I thought that she was agreeing

Salzman - Direct - Hajjar

1780

1 because she did want to do it not because I was pushing her in
2 an area she didn't want to be pushed, and she didn't feel
3 strong enough to say, no, or felt afraid because of her
4 collateral. Because I had substantial collateral on her.

5 Q Turn to page 16. Is this the message you sent?

6 In theory, each act should be doing about an hour of
7 work per week for their M as a normal contribution or act of
8 care.

9 Is that something you considered?

10 A Yes, after Keith came to a meeting and shared that that
11 was what he thought should be, I communicated it to Audrey.

12 Q And what does that mean?

13 A That means each slave should be doing about an hour per
14 week of work for the master as in moral act of care, which
15 should be going on any way.

16 Q And the following message: What generally helps me most
17 is you considering where you can bring the most and highest
18 level of skills you have to my life and objectives at the
19 highest standard possible. I have an assistant. I have a
20 cleaning lady. So that doesn't really help me that much and
21 it's lowering the value of what you could be attributing to
22 furthering me.

23 A Correct.

24 Q Can you explain what you meant by that?

25 A Yes. And this was a concept that we looked at earlier in

Salzman - Direct - Hajjar

1781

1 the book, which is that ideally you want be to be providing
2 most value at all times that you can to your master to be
3 furthering them in the most valuable contribution way.

4 Q So what did that mean with respect to Audrey, as you were
5 conveying this to her?

6 A The highest skills that she could bring, she should
7 bring. The work that she could do, she should do.

8 Q Turning to page 20. This is Audrey message to you:
9 Master, may I eat extra today calories today. I felt really
10 hungry for past two days since I got my period. Much stronger
11 than usual. I have tried to pace my calories throughout the
12 day; 100, 200 at a time, as you suggested, but I'm still
13 feeling very hungry. Last night I had trouble falling asleep
14 because of it. My period also stopped after one day. I don't
15 know if this is related, but I think it might be.

16 Were these types of requests for -- was Audrey on a
17 restricted diet in terms of her calories?

18 A Audrey -- when Audrey first joined, she communicated that
19 she didn't feel that she was meeting her health and fitness
20 goals, and I asked her to track her calories to see how much
21 she was eating. So she did that. And then I suggested -- or
22 I told her to go down 100 calories. So she was on 1500
23 calories a day diet, I believe.

24 Q Did she have to ask you permission to eat more than that?

25 A I did.

Salzman - Direct - Hajjar

1782

1 Q Did you refuse her?

2 A I did.

3 Q And so the next message when you say: No, I don't think
4 you need this, I believe your calories are already high.

5 A Yes.

6 Q She was not permitted to eat the remaining calories she
7 wanted?

8 A Correct.

9 Q Turning to page 21. Are these three messages your
10 messages to Audrey?

11 A Yes.

12 Q Can you read them, please?

13 A I am pushing you on this because you're doing a very
14 weenie version of a program that you think is a big deal.
15 Your capacity for discomfort and self-denial is super low and
16 this limits your capacity to even vision an ideology beyond a
17 very low level of morality. You need to push against this to
18 gain a sense of self.

19 Part of the masturbation denial is also denying the
20 fantasy shit you link with it, which is counter growth for you
21 overcoming self victimization and suffering.

22 I'm telling you this not as your master but as a
23 green in ESP and head of stripe path. If you want to get a
24 proctor, you must evolve this and the long circuitous road is
25 not a good option.

Salzman - Direct - Hajjar

1783

1 Q The second message refers to masturbation denial.

2 Did you require Audrey to refrain from masturbation?

3 A She suggested it as an option, and I said that she should
4 take that option, that would be good.

5 Q In what context did she raise it as an option?

6 A The context of -- I don't recall specifically, but
7 absence of self-denial in getting over being led to the body.

8 Q Was that something you suggested?

9 A Yes.

10 Yes, I mean I was -- at the time looking at it as
11 she needed to overcome is exactly what I said. She didn't
12 have a good capacity to do this and she should be doing this
13 if she wanted to grow and if she was really committed to
14 growth she would be doing this.

15 Q When you say: I'm telling you this not just as your M
16 but as a green in ESP and head of the stripe path. If you get
17 a proctor, you must evolve this?

18 A Yes. I shouldn't have said that, but, yes.

19 Q What does that mean?

20 A That I'm telling her as a green in ESP and as head of the
21 stripe path, these are the requirements that we look for to
22 see that you'll qualify to evolve. So if you're not getting
23 passed it, you're not going to meet those requirements for
24 promotion.

25 So she's saying she wanted to get promotion in ESP

Salzman - Direct - Hajjar

1784

1 and she wasn't meeting the promotion and I wanted her to know
2 that if she got through this, she would get that.

3 Q So by saying that, you are linking promotion in ESP --
4 professional promotion to her being a good DOS slave?

5 A Yes. And it shouldn't have been linked.

6 Q What does that mean, it shouldn't have been linked?

7 A More important, DOS was never a requirement for promotion
8 in ESP and it should not have been factored into promotion in
9 ESP, but I linked them in this conversation.

10 Q Why? Why did you do that?

11 A Because I knew she wanted to get to proctor and I wanted
12 her to get to proctor. I knew what was required for her to
13 get to proctor.

14 So I thought if I told her this was important it
15 would help connect it with a goal that she had, and help
16 motivate her to do it.

17 Q Was your input important in terms of who was promoted
18 within ESP?

19 A Yeah, I was head of the promotion program.

20 Q What about the defendant?

21 A Yes, ultimately I mean he did reject or override -- he
22 could reject or promote anybody, whether we had suggested or
23 denied promotions.

24 Q Turning to page 23 of Government Exhibit 432. You write:
25 If you want to use that again for failure, penance should be

Salzman - Direct - Hajjar

1785

1 modified to three hard whacks. If you snap the wrist right,
2 it should really hurt. That's how you know you're doing it
3 right. Please relay to all.

4 What are you talking about there?

5 A I'm talking about what Keith told us should be how we
6 paddle each other.

7 And I left the meeting where he told us how to
8 paddle each other, communicate to Audrey specifically how they
9 should be paddling each other.

10 Q Was that a direction?

11 A Yes.

12 Q Turning to page 26, you write: I don't think everyone
13 handed in monthly guarantees. I didn't get anything from
14 Charmel or Sarah for anyone below our line. Can you follow up
15 with everyone? Audrey refers to bank accounts for May. And
16 after that: What's your take of Amanda's.

17 What are you talking about here, you and Audrey?

18 A Amanda submitted -- we're talking about monthly
19 collateral that she submitted, which she said she -- the bank
20 accounts were for May.

21 And that her take on Amanda's was Amanda had
22 submitted a video and I wasn't able to watch the whole thing,
23 but Audrey made the video with Amanda, so I wanted Audrey's
24 take on it, whether Audrey thought it was strong enough. And
25 I told Audrey to assess that without me watching the video.

Salzman - Direct - Hajjar

1786

1 Q So when you Audrey replied: It's good, I think. She
2 basically says she's only marrying him to use him for his
3 money because he had no other options.

4 What does that refer to?

5 A What she said about her fiance in the video.

6 Q Amanda?

7 A Correct.

8 Q And "it's good, I think" refers to strengthening the
9 collateral?

10 A Yeah.

11 That it should be sufficiently damaging to their
12 relationship were it to come out.

13 Q Turning to page 29, you write: We haven't really started
14 training you guys get.

15 What are you talking about?

16 A Keith said that he hadn't really started disciplining us
17 yet and so we didn't know -- we weren't doing things as we
18 needed to be doing with the slaves because we hadn't been
19 disciplining them yet. So I relayed that as well, that we
20 hadn't started discipline. I hadn't started training them in
21 disciplining them yet.

22 Q The next message down, you say: I have so much on my
23 plate that I cannot keep up and I have not had time to
24 discipline you guys properly.

25 Is that something the defendant told you and the

Salzman - Direct - Hajjar

1787

1 other first line slaves as well?

2 A Yes. And I did have so much on my plate that I wasn't
3 able to keep track of what was going on with them.

4 And A lot of what I had on my plate were the things
5 that we were doing in DOS.

6 Q Turning to page 48, you write: Good morning, with
7 respect to your check in last night.

8 And then the message continues: Any efforts you put
9 in here will come back exponentially. And once you build your
10 organization here, you will have six Ss, plus however many
11 brand Ss will devote time weekly, moving your life and
12 projects forward.

13 What are you telling Audrey here?

14 A I'm telling her that -- she was concerned that she didn't
15 have enough time and obviously because of the things she was
16 doing here, and I was telling her if she had six slaves who
17 had six -- each had six slaves, she would have weekly time
18 committed to her for life of help and support that would save
19 her time with her life.

20 Q So when you write: Any efforts you put in here will come
21 back exponentially.

22 What does "here" refer to?

23 A In DOS.

24 Q The next page you write: Imagine if you have six people,
25 who each have six, so 36 people, who each devote one hour of

Salzman - Direct - Hajjar

1788

1 time per week to moving your life forward. That's a full-time
2 employee's amount of work times for life?

3 A Yes.

4 Q What are you referring to here?

5 A I'm referring to the same thing, that active care that
6 Keith said, if you had everybody who you enrolled in one hour
7 for their master and grandmaster, everybody would have almost
8 40 hours of week of full-time work.

9 Q And what's the point of telling this to Audrey at this
10 moment?

11 A Because she was upset she didn't have a lot of time
12 because of the things she was doing in DOS.

13 Q And you're telling her she will benefit from being in DOS
14 and having slaves to work for her?

15 A Yes.

16 Q You write: Do you want to be a proctor? This is
17 page 52. Do you see how you're antihumanitarian,
18 anti-interdependence.

19 What are you talking about here?

20 A That she was being -- that she was communicating things
21 that were not humanitarian in nature or of a team perspective.

22 And she's saying she wanted to be a proctor in a
23 humanitarian organization where the whole idea was that the
24 hole is bigger than the sum of the parts. It was a whole team
25 environment. And if she wanted to become a proctor in a

Salzman - Direct - Hajjar

1789

1 humanitarian organization that was focused on -- on being part
2 of a larger team, she needed to overcome the issues that made
3 her not want to be around people and the antihumanitarian in
4 the way she related with them.

5 Q Were you connecting her progress in terms of making
6 proctor to her performance in DOS?

7 A I didn't mean to, but I did it. Yes. It wasn't my
8 intent, but I did that, yes.

9 Q Looking at page -- on page 53, you write: You will never
10 be a proctor in this organization as long as you believe that
11 helping others is not a high priority.

12 And Audrey says: No, I'm sorry, master, that is not
13 what I'm intending to say.

14 Did Audrey want to be a proctor?

15 A Yes, she did.

16 Q And then the following page, page 56: I just talked to
17 KT. She had a full throttle tantrum about the guarantee.
18 Flatly refused to do it and is painting this whole thing as
19 bad in her mind.

20 What is she talking about there?

21 A That Kristin doesn't want to submit her collateral. And
22 that she is refusing to submit collateral. And believes that
23 DOS is bad and that the whole collateralization is bad.

24 Q How did you respond to that?

25 A I don't recall specifically, but I -- I likely told

Salzman - Direct - Hajjar

1790

1 Audrey to just help her try to work with her and see if she
2 can get her through it.

3 Q Miss Salzman, you testified that prior to joining DOS you
4 were aware of the defendant's sexual relationships with the
5 first -- with certain first line DOS slaves?

6 A Yes, I was.

7 Q When you were first recruited into DOS, did you believe
8 that DOS was sexual in nature?

9 A No.

10 Q Did you come to learn that there was a sexual component
11 in DOS?

12 A Yes.

13 Q Can you give some examples of that?

14 A Well, naked pictures. Specifically up-close vagina
15 pictures that I think are sexual in nature. Paddling, I
16 thought was sexual, it had a BDSM component. The dungeon was
17 all BDSM equipment that I was told about. Seduction
18 assignments I think are sexual in nature. And having sexual
19 relationships or interactions with a slave is certainly sexual
20 in nature.

21 Q Did there come a time where you learned that other first
22 line DOS masters had assigned their slaves to interact with
23 the defendant?

24 A Yes, I did.

25 I went to -- we were having a first line DOS

Salzman - Direct - Hajjar

1791

1 meeting, and we were talking about where in each of the
2 enrollment stages the five enrollment stages that we reviewed
3 here each of the slaves were, or everyone in our -- where
4 everyone in our organization was and our projections.

5 And Allison shared not only where everybody was in
6 each of the five stages but that she had tasked a number of
7 people to do something she called the assignment. And I had
8 never heard about the assignment.

9 And so I was like, What's the assignment? And that
10 she -- it turned out the assignment was that she had tasked
11 them to seduce Keith was the assignment.

12 Q Did you understand "seduce Keith" to be a sexual act?

13 A I interpreted it that way, yes, I did.

14 Q Was there more conversation about this assignment at that
15 time?

16 A Not right then, but later we had more discussions about
17 it.

18 Q Did you have a conversation with the defendant about it?

19 A I did. I went to him and asked him about it. And he
20 told me that the purpose of the assignment was that they --
21 for women to be able to have an experience with a man where
22 the man could abuse power but didn't, and that he thought that
23 that would be a good experience for them to have, a growthful
24 experience for them to have.

25 Q And how did you take that?

Salzman - Direct - Hajjar

1792

1 A I felt -- I felt concerned about it, and I still felt
2 that it was a type of abuse of power. Because I couldn't
3 imagine being a man and having a woman come and do things to
4 try to seduce you and you not having some sort of experience
5 of power in that situation.

6 But also if I imagine going to try to seduce a man
7 who I didn't have any sexual relationship with, especially if
8 that man didn't take me up on the offer, I would then have
9 feelings toward that man. I would have feelings towards them
10 once I tried to seduce them, even if didn't have those
11 feelings before, especially if he didn't take advantage of the
12 situation, I would like him more.

13 So I couldn't imagine that not changing the
14 interaction he was having with the slaves. But then I needed
15 to believe also that he would never do that and that it was
16 just him not abusing power and giving them a good experience
17 and so then I --

18 Q What does that mean?

19 A -- compartmentalized it and move forward believing this
20 is all good, and DOS is good and it can't be anything or what
21 I'm imagining they are, because it's just my fears that are
22 running and...

23 Q Did you believe the defendant when he said that there
24 would be -- no sexual interaction would take place?

25 A I wanted to believe him. I wasn't sure.

Salzman - Direct - Hajjar

1793

1 Q Did you have a later conversation with Allison Mack in
2 San Diego?

3 A I did.

4 Allison and I -- I can't recall the specific words
5 that she said in those -- in the conversations we had in San
6 Diego. But it came away from the conversations with her
7 believing that Keith was having sex with all her slaves, based
8 on all the assumptions that she was using and the way she was
9 talking about things during the time we were there.

10 Q What happened after that?

11 A I came home and said to Keith: Are you having sex with
12 Allison's slaves? And he said: No.

13 And I said: Why does she think you are? And he
14 said: Because I didn't correct her.

15 Q What did you understand that to mean?

16 A I understood it to mean that he was trying to be truth --
17 like be right on the technicality.

18 Because in my mind the next question was: Well, how
19 did she get that impression in the first place? So I didn't
20 ask it, because I believe he knew what I was asking and
21 specifically chose not to tell me truth about it.

22 And so I believed that either he was lying to me in
23 that moment or he was lying to Allison, but in either case he
24 was lying to somebody about this.

25 Q So what did you do after you spoke to the defendant?

Salzman - Direct - Hajjar

1794

1 A I went back to Allison.

2 Q And what did you say?

3 A Is he fucking your slaves, is what I said.

4 Q What did she say?

5 A She said: Just Nicole and Suzy. But we're going to
6 start working with India and Jay.

7 And I said to her: When you say working, do you
8 mean fucking? And she said: Yes.

9 (Continued on next page.)

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Salzman - Direct - Hajjar

1795

1 BY MS. HAJJAR (CONTINUED):

2 Q What did you do after that?

3 A I suppress my feelings about it and continued forward.

4 Q Did you later come to learn that Allison's slaves were
5 not the only ones to get the seduction assignment?

6 A Yes. I can't remember the time frame, but at one
7 first-line DOS meeting, I said something but -- along the
8 lines that Allison had been the only one who had assigned
9 people this assignment, and Nicky said no, she's not. And
10 then I learned that other people have been tasking their
11 slaves to do assignment.

12 Q At some point did you learn that Nicky's slaves had
13 been tasked to that assignment?

14 A Yes, I just contact recall when. But yes, I did.

15 Q Did you subsequently raise Nicole's name with the
16 defendant again?

17 A Yes, I did.

18 Q What was your conversation with him?

19 A What he had said when I -- also when I had asked him
20 about the seduction assignment, was that it wasn't always
21 going to be him doing the seduction assignment; that at some
22 point, somebody else was going to be doing the seduction
23 assignment. And Cami and I had a conversation about it at
24 one point in time and I went to him and said Camila and I
25 were talking about who was going to be run the seduction

Salzman - Direct - Hajjar

1796

1 assignment, and he said Nicole was going to be heading that
2 testing.

3 Q Now, at some point after these conversations was the
4 existence of DOS publicly exposed?

5 A Yes, in June 2017.

6 Q How did that happen?

7 A Sarah's husband, Nippy, came and confronted myself and
8 Jim Del Negro at coach summit in a very public way. And
9 then a series of rumors about -- or allegations surrounding
10 DOS started circulating through the West Coast community and
11 so we were hearing back about that. And within a few days a
12 blogger started blogging about everything very publicly,
13 obviously the blog is public.

14 Q When you say rumors and allegations, were they true?

15 A Yes.

16 Q And when you say Sarah's husband approached you, was he
17 angry?

18 A Yes, he appeared angry. He was yelling at me and Jim.

19 Q Did the aspects of DOS after that become publicly --
20 publicly discussed --

21 A Yes.

22 Q -- within the NXIVM community?

23 A Yes.

24 Q Did members of the community raise concerns to you?

25 A Yes, they did.

Salzman - Direct - Hajjar

1797

1 Q Did you try to reach the defendant after Sarah's
2 husband confronted you?

3 A I did. I was sending him 911 text messages and trying
4 to call him and call anybody I thought he might be with to
5 try to find him.

6 Q What were the 911 text messages?

7 A It was like, I need to talk to you now and I was
8 sending literally 911, which in 20 years I never sent a 911
9 text message, but like that this is important, this isn't
10 just if you're busy don't get back to me now, it's serious.

11 Q I you eventually reach him?

12 A I did.

13 Q And what was the conversation you had with him?

14 A I told him that Nippy was really upset and that he had
15 said, My wife had Keith's initials branded next to her
16 vagina, you know, like this is not okay and basically
17 resigned from all his positions within our community and
18 didn't want to speak to me ever again, didn't want to speak
19 to Keith ever again, so I relayed that.

20 Q And how did the defendant respond?

21 A He responded saying, Well, Nippy found out that my
22 initials were branded next to his wife's vagina, how do you
23 think I feel learning that this wife branded my initials
24 next to her vagina.

25 Q How did you -- what did that mean to you?

Salzman - Direct - Hajjar

1798

1 A Well, it was Keith's initials and Keith knew it was his
2 initials and I knew it was his initials and I knew he knew
3 that it was his initials, so I interpreted it as him acting
4 out how I should respond to Nippy, like Keith didn't know
5 this, how do you think he's feels learning this. That was
6 the party line on it, like Keith just learned this, you
7 know, how do you think he feels knowing that a bunch of
8 women went around and did this?

9 Q Were there subsequently meetings with the defendant and
10 the first line of DOS?

11 A Yes.

12 Q And can you describe those meetings?

13 A That we went to the DOS house and were trying to figure
14 out how to deal with everything that was happening. And
15 everybody's questions and upsets surrounding it and
16 basically, you know, Keith directed that we were not going
17 to tell anybody about his involvement, it was going to be
18 secret, that he didn't know anything about it, that he
19 wasn't associated with it, that the brand was not his
20 initials and he gave several options for how we could
21 address the concerns that were being raised to make it look
22 like they were all things that were not the truth. Which is
23 that the brand instead of being his initials could be
24 explained that it had seven lines so it was the seven
25 chakras or it was the four elements or it was bar alpha mu.

Salzman - Direct - Hajjar

1799

1 It wasn't Keith and Allison's initials because there were
2 assertions that it was Allison's initials, too, which it
3 wasn't bit those were going around as well. And then things
4 about the seduction assignment which he said could be
5 described as a dare or a test of Abraham, that it was a test
6 to see if the slave was committed enough that they would
7 carry out the act but that they didn't -- it was never
8 intended that they actually would follow through on the act,
9 that it was just a test to see -- a trust test.

10 Q What did the test of Abraham, that phrase, what did
11 that mean to you?

12 A My understanding of test of Abraham is in the Bible,
13 God tasked Abraham to sacrifice his son on the alter. It's
14 a test of faith and loyalty and Abraham was willing do it
15 and then at the end God said you didn't have to do it, I
16 just wanted to see if you were willing to do it.

17 And so that's how we went out and described it,
18 that the women had been tasked to seduce Keith but the
19 intent was that it was never carried out and that Keith
20 don't know anything about it.

21 Q The -- how did the defendant -- what did the defendant
22 instruct you to say regarding the brand?

23 A That it was the seven chakras and the four elements or
24 it was bar alpha mu but that it was not his -- but it was
25 not intended to be his initials but that when the design was

Salzman - Direct - Hajjar

1800

1 being created somebody noticed that it looked like his
2 initials and so it was refashioned to include -- incorporate
3 them as tribute.

4 Q Now, these explanations of seven chakras, the four
5 elements or bar alpha mu, had you ever heard of these things
6 before to explain the brand or refer to the brand?

7 A No.

8 Q You testified earlier that the DOS meetings where the
9 defendant attended were recorded?

10 A Yes.

11 Q After DOS was publicly disclosed were your meetings
12 recorded?

13 A No.

14 Q How was bar alpha mu going to be an explanation of the
15 brand? Can you explain that?

16 A Yeah, because it looked like the brand, like if you
17 look at the K facing downward, you know, with an A under it,
18 it could have been a bar like a line with an alpha, you
19 know, which is a Greek letter. And the R, the squiggle for
20 the R actually did look like an M, which is why people
21 thought it was Allison's initials. So it was like making it
22 like it was Greek letters, like the bar is a mathematical
23 symbol but it was the bar and then an alpha Mu, so it was
24 like logical that it could have been Greek letters because
25 we were a sorority and all the sororities had Greek letters.

Salzman - Direct - Hajjar

1801

1 Q And who came up with this idea of bar alpha mu?

2 A Keith.

3 Q Okay. I'm showing you what's in evidence as
4 Government's Exhibit 429. Can you just explain with
5 reference to the brand as it actually looked what the story
6 was about bar alpha mu?

7 A To show the bar alpha mu.

8 Q Yeah.

9 A The bar, the alpha and the Mu.

10 Q Were there other steps that you were to take with
11 represent to bar alpha mu to make it seem as though that's
12 what DOS had been?

13 A Yes. Keith wanted us to make a website and so we did
14 and that the formal name of the sorority was going to be Bar
15 Alpha Mu, we decided that, after, like in the fall.

16 Q And some point after that did you communicate with
17 Monica Duran?

18 A I did.

19 Q What did you say?

20 A She had gone back to Mexico. Her mother was ill and
21 she was caring for her and so she wasn't present and so I
22 was texting her saying, you know, I miss you and FYI the new
23 name of the sorority is Bar Alpha Mu and she said since
24 when? And I said since always.

25 Q What did you mean -- what did you mean by that?

Salzman - Direct - Hajjar

1802

1 A That the party line, the story on it was this was
2 always the name.

3 Q And do you understand that Monica got that?

4 A Yeah. She said okay, got it. Yeah, yeah, she
5 understood what I was saying which is that it was always Bar
6 Alpha Mu, it was never Keith's initials.

7 Q Did you follow the defendant's instructions about what
8 to tell people about DOS?

9 A Yes.

10 Q And did you deny the defendant's involvement in DOS?

11 A Yes.

12 Q Did you lie to your mother about the defendant's
13 involvement in DOS?

14 A I did. I lied to everybody about it.

15 Q How did your mother react?

16 A Horribly. My mother -- well, I mean, this going public
17 and all of the allegations and everything that we've been
18 talking about, inspired a massive like de-enrollment from
19 NXIVM. People were scared, people were leaving and my mom
20 felt -- and the only people whose names had been public were
21 mine and Allison's. So my mom felt that basically a group
22 of women impulsively didn't think things through and decided
23 somehow that it was a good idea to go give tribute to Keith
24 be branding his initials next to their vaginas and giving
25 seduction assignments. And she was like how could you do

Salzman - Direct - Hajjar

1803

1 this? How could you be so impulsive and not think and put
2 our whole company, everything that we've worked for, for 20
3 years in jeopardy? Like I just don't even understand how
4 you could do this. She was like so upset, so upset, and she
5 blamed me and my friends, I mean, Allison she knew of, there
6 were others she suspected but basically she blamed us for
7 destroying her company.

8 Q Was it difficult for you not to tell your mom the truth
9 about the defendant's role as your master?

10 A Yes, it was so hard. And she said, I went to Keith and
11 he told me he had -- he knew nothing of this. And so I was
12 like, yes, it was me.

13 Q Who else did you lie to?

14 A I lied to everybody. I lied to the entire community
15 about it. I lied to the media about it, I lied to everybody
16 about it.

17 Q Did you address the community publicly?

18 A I did.

19 Q Did you lie about the defendant's involvement then?

20 A Yes.

21 Q Did your DOS slaves learn more information about DOS
22 during and after this period of time when DOS went public?

23 A Yes.

24 Q What happened?

25 A Well, Sarah left the initial weekend and then Audrey

Salzman - Direct - Hajjar

1804

1 started to learn more and she started bringing concerns to
2 me and she had a discussion with Danielle who knew that
3 Keith was involved and Danielle told her that Keith was
4 involved and so Audrey came back to me and said, I'm very
5 troubled to learn that Keith's involved, you know, and
6 basically you lied to me, you know, and that's troubling and
7 as well like I just really think that there's a big ethical
8 issue and an incredible -- like a situation where abuse --
9 like she was very concerned about abuse of power and she was
10 like this is an incredible abuse of power and I think that
11 there's no ethical checks on Keith and this is very
12 concerning to me.

13 Q I'll show you what's evidence as
14 Government's Exhibit 432. Again, this is Page 60. This
15 is -- are these messages with Audrey in the immediate wake
16 of public disclosure of DOS?

17 A Yes, they are, yes.

18 Q And where you write, Do you understand that I didn't
19 know any of the stuff I shared with you the other night and
20 also that Keith didn't know any of this, he just found this
21 out when we did.

22 Was that truthful?

23 A No.

24 Q What were you telling her there?

25 A I was telling her that everything we were learning

Salzman - Direct - Hajjar

1805

1 about Keith's initials and seduction assignments was
2 something that I just found out and that Keith also didn't
3 know.

4 Q At around this time, and subsequently, did you receive
5 requests for return of collateral?

6 A Yes.

7 Q Who asked for their collateral back?

8 A Audrey and Kristin did but many other people did, too.
9 People who I didn't enroll and other people below me in line
10 and in my lineage.

11 Q Did you personally receive requests for collateral
12 back?

13 A I did, yes.

14 Q And what did you when you received those requests?

15 A I forwarded them to Clare.

16 Q Why?

17 A Because Clare was heading up our legal initiatives.

18 Q Do you recall when Audrey requested her collateral back
19 from you?

20 A Not the specific date, but I recall that she did. I
21 remember that she did.

22 Q Would there be something that would refresh your memory
23 about that?

24 A I believe she sent me an e-mail.

25 MS. HAJJAR: Your Honor, may I show the witness

Salzman - Direct - Hajjar

1806

1 what's marked as Government's Exhibit 418?

2 THE COURT: Go ahead.

3 A So she sent this on July 10th, 2017.

4 Q Just take a moment to read this, Ms. Salzman.

5 A To myself?

6 Q Yes.

7 A (Witness complies.) I see. She sent me this on
8 July 7th and then requested it to the executive board on
9 July 10th. The executive board of NXIVM.

10 Q What was the content of the request for collateral
11 back? What did she want?

12 A She wanted to know that her collateral basically would
13 be destroyed. She wanted the collateral -- all the
14 collateral back and she listed it and she said that if I
15 didn't respond to it she was going forward the request to
16 the executive board.

17 Q Did she list out the collateral she had --

18 A Yes.

19 Q -- she had given you?

20 A Yes, specifically she listed it.

21 Q What was the list that she requested the return of?

22 A It was the naked pictures she had given me, the videos
23 that we had made together disparaging people in her life,
24 the letter accusing her boyfriend of domestic violence, two
25 videos or a paddling video and some pictures that she had

1 taken with -- naked pictures that she had taken with her
2 circle.

3 (Continued on next page.)
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L. Salzman - direct - Hajjar

1808

1 A (Cont'g.) I recall -- I mean her bank accounts were part
2 of the collateral but I don't recall specifically what was to
3 be done with that.

4 Q Did she say anything about the circumstances under which
5 the collateral had been taken?

6 A Yes, that she believed that it was under false pretenses,
7 that we had lied about Keith's involvement and gained it based
8 on misrepresentations.

9 Q You testified that Audrey sent this request for
10 collateral to you on July 7th?

11 A Yes.

12 Q Was it then forwarded onward?

13 A Yes.

14 Q Why?

15 A Why did I forward it or why did Audrey?

16 Q Had Audrey said that she would forward it if you didn't
17 respond?

18 A She did, she said if I didn't respond she was going to
19 forward it to the executive board --

20 Q And did she?

21 A -- of NXIVM.

22 Yes, she did.

23 Q Who did she send it to?

24 A She sent it to all members of the board. The initial
25 request came to Keith, Allison and myself. Then she forwarded

L. Salzman - direct - Hajjar

1809

1 it to I believe the executive board at the time which was
2 myself, Karen Unterreiner, Clare Bronfman, Alex Betancourt,
3 Omar Boone, I can't remember if Emiliano Salinas was still
4 part of the board or not and I don't recall if my mom was on
5 it as well.

6 Q Was it forwarded to the defendant?

7 A Yes, it was sent to him. I think initially it was sent
8 to just me, Keith and Allison but it was sent to Keith, yes.

9 MS. HAJJAR: Your Honor, I'm just going to show this
10 to the witness to refresh her memory on this.

11 THE WITNESS: I see. Initially she sent it to me
12 and then she forwarded it to myself, Keith Allison and cc-d
13 Nancy, Karen, Omar, Alex Emiliano and Clare.

14 Q What was the date on which the email was forwarded?

15 A It on July 10th, 2017.

16 Q Did Audrey get her collateral back?

17 A No, nobody their collateral back.

18 Q Did Kristin make a similar request for the return of her
19 collateral?

20 A She did, yes.

21 Q When was that?

22 A Around the same time, a little bit later than Audrey.

23 Q Did she send it to you -- what form did that request
24 take?

25 A It was an email as well.

L. Salzman - direct - Hajjar

1810

1 Q Who did she send the email to?

2 A I don't recall but it was at least me and if I saw the
3 email I could tell you.

4 Q I'm going to show you what's marked as Government
5 Exhibit 428-R. Just take a minute to look that over.

6 (Pause in the proceedings.)

7 A Yes.

8 Q Around when was this email sent to you?

9 A The end of September in 2017.

10 Q And who else was it sent to?

11 A It was sent to the entire executive board.

12 Q To include?

13 Would you like to see it again?

14 A Yes, yes, can I look at it again?

15 (Pause.)

16 A It was sent to Alex, Emiliano, Clare, Karen, Omar, and
17 myself.

18 Q And in the email what did Kristin request the return of?

19 A She requested the return of a video about her business
20 and religion, a letter to her sister, a false journal entry
21 about her parents and a photo of a letter denouncing her
22 religion.

23 Q And were these all items of collateral that had been
24 committed?

25 A Yes, they were.

L. Salzman - direct - Hajjar

1811

1 Q Did Kristin express anything about the circumstances
2 under which this collateral -- she had given the collateral?

3 MR. AGNIFILO: I'm going to object to this, Your
4 Honor.

5 THE COURT: You may answer. (Pause.) You may
6 answer.

7 A That she felt that they were false pretenses and that she
8 was lied to on multiple occasions in the enrollment process
9 about the brand and specifically the obtaining of collateral.

10 Q Why wasn't their collateral returned to them or
11 destroyed?

12 A I mean in the end because Keith said not to but, you
13 know, the theory behind it was that it had been given to hold
14 a promise and that promise was still valid even if they broke
15 their promise, it was given for something in exchange for
16 something, there was an agreement and so that agreement still
17 existed at least in theory.

18 THE COURT: Are you discussing the written contract?

19 THE WITNESS: No, their agreement, they gave
20 collateral in exchange for information about DOS as access and
21 it was to secure the privacy and secrecy of the group and also
22 for them to stay forever. So, even if they chose to leave,
23 that that collateral was subject for forfeiture which was the
24 agreement.

25 THE COURT: It was an oral agreement?

L. Salzman - direct - Hajjar

1812

1 THE WITNESS: Oral agreement. Audrey signed a
2 contract but the contract was never finalized but it was an
3 oral agreement.

4 THE COURT: I see.

5 Q Did a woman named Carly also request -- make a request in
6 connection with DOS?

7 A Yes.

8 Q And when was that?

9 A I don't recall specifically but if I saw the email again
10 I could tell you.

11 Q Just to refresh your memory I'm going to show you what's
12 been marked as Government Exhibit 1473, just take a moment to
13 read this.

14 (Pause.)

15 A Okay.

16 THE COURT: Could I see the top of that please?

17 MS. HAJJAR: Yes.

18 THE COURT: All right.

19 Q Ms. Salzman, when was this email sent to you?

20 A On the 4th of July, 2017.

21 Q And who did Carly send this email to?

22 A She sent it to the executive board, the greens and the
23 admin team and then cc-d all of the leadership in Vancouver
24 where she was a member of the ESP center.

25 Q Can you name the individuals who are the executive board

L. Salzman - direct - Hajjar

1813

1 please?

2 A Myself, Clare, Alex, Emiliano and Karen and then she also
3 sent it to the greens and Pam who is -- I'm not sure which Pam
4 that is but she sent it to the greens who are myself, Esther,
5 Emiliano, Alex, Sara Bronfman, and then included in that group
6 as part of the leadership council was Sara and Mark Vicente.
7 Then she sent it to the admin team which included my sister.
8 She also sent it to Rosa Laura, whose line she was in in DOS,
9 and to my mother, Nancy Salzman; and then additionally to
10 Lucas Roberts, Leah Mottishaw, Chris, Wendy, Rosen, Ariella
11 Subalewski (ph), Anthony Ames and she said this is her formal
12 resignation.

13 Q And what did she ask for in this request, what did she
14 want?

15 A She wanted outstanding refunds that she was waiting for
16 from NXIVM and V Week and I believe she was also asking for
17 her collateral back.

18 Q What collateral did she request back?

19 A A pornographic style video and a video about her business
20 as well as some photographs.

21 Q And this request for her collateral, a pornographic video
22 and the video about her business, was sent to the entire
23 executive board?

24 A Yes.

25 Q And --

L. Salzman - direct - Hajjar

1814

1 A It was sent to the entire leadership base of NXIVM and in
2 her area.

3 Q In July of 2017?

4 A Correct.

5 Q Did Carly express negative views about her experience in
6 DOS?

7 A She was, she was expressing that. She was saying she
8 felt she had been lied to, that Keith's identity was withheld
9 as well as other information that she felt was withheld until
10 she gave collateral and then she learned about the brand and
11 the collar and then she was upset about the way that the
12 leadership was handling it and felt that we were all lying to
13 her which we were.

14 MR. AGNIFILO: Your Honor, I'm sorry, can we have a
15 sidebar?

16 I object and I respectfully move to strike that for
17 the reasons that we talked about this morning.

18 THE COURT: Next.

19 Q Around this time, Ms. Salzman, were there efforts to
20 aggregate and to secure collateral?

21 A Yes, there were.

22 Q And at this point was it your understanding that
23 collateral would be released if a DOS slave left or spoke out
24 publicly about DOS?

25 A Initially it was and when it became public there were

L. Salzman - direct - Hajjar

1815

1 discussions where Keith wasn't sure that we should release the
2 collateral.

3 Q Were there discussions with the defendant where he
4 considered whether or not to release collateral?

5 A Yes.

6 Q Did the defendant express a concern about releasing
7 collateral at that point after it had been made public?

8 A Yeah, that it would validate the allegations being made
9 against us and also wouldn't serve any purpose because the
10 purpose that it was given for was already broken.

11 Q At this time were there efforts to discredit the
12 allegations that were made by former DOS slaves including
13 Sarah?

14 A Yes.

15 Q What were those efforts?

16 A We made efforts to show that -- to discredit her
17 accounting of her branding ceremony and pointing to
18 inconsistencies in her statements as well as sharing alternate
19 hypotheses about why she had actually left that wasn't this.

20 Q And were there other statements or efforts you made to
21 discredit those allegations?

22 A Well, in conjunction with creating the website, Keith
23 wanted us to write like position statements. We didn't ever
24 release those but we all wrote position statements as well as
25 securing testimonials that DOS was a positive experience and

L. Salzman - direct - Hajjar

1816

1 women -- and a consensual experience that many women would
2 attest to.

3 Q And did you gather materials that would assist you in
4 making and putting forth that position?

5 A I did, yes.

6 Q What did you do?

7 A I asked all of the first line DOS masters for examples
8 that showed consent and positivity about positive experiences
9 about DOS.

10 Q Did that include photos where DOS slaves appeared to look
11 happy?

12 A Yes.

13 Q You've discussed the requirements of the photographs in
14 the context of DOS; do you have a view on photographs where
15 DOS slaves appeared happy now?

16 A Yes, well, some of the photographs that I included in
17 this compilation were photographs that I had instructed them
18 to retake specifically to look happy and it wasn't -- I mean
19 it wasn't a thorough representation, a full representation of
20 like the positives and the negatives, it was just cherry-
21 picking the positive, the things that looked positive. There
22 were also I mean within my group concerns that were negative
23 and allegations of extortion going on before, before this
24 happened and during this time, so they were left out.

25 Q Who else was involved in these efforts with you?

L. Salzman - direct - Hajjar

1817

1 A All of the first line DOS and Keith.

2 Q At some point in August of 2017 did the defendant address
3 the NXIVM community?

4 A He did, yes.

5 Q When was that?

6 A He addressed the leadership at V Week, so proctors and
7 above, and he also wrote a statement on the website.

8 Q And V Week is the abbreviation for Vanguard Week?

9 A Vanguard Week, yes.

10 Q Which is a celebration of his birthday?

11 A Yes.

12 Q What did the defendant say?

13 A He said he wasn't affiliated with DOS, that he had very
14 little knowledge about it but he advocated for the group and
15 he said some of the things in the group were a little racy and
16 could be seen as, you know, alternative but that ultimately he
17 thought they were good and essential.

18 Q Was that true?

19 A No. No, he created DOS and was very involved in all the
20 aspects of it and I think what was going on in the group was
21 more than just a little racy or alternative.

22 Q Was there --

23 A Or he said edgy, edgy was the word he used.

24 Q Was there a coach summit that took place shortly after?

25 A Yes.

L. Salzman - direct - Hajjar

1818

1 Q What was the subject of that coach summit?

2 A The entire coach summit focused on basically the
3 difference between using the media versus the legal system to
4 address disputes and laid out that our adversaries basically
5 were using the media which was vigilante justice and this was
6 not considered to be honorable or ethical and that we thought
7 that the more honorable or ethical means would be to use the
8 legal system and that we believed in the justice system of
9 this country and so that was what we were going to do.

10 Q What do you think of that coach summit now?

11 A Well, I think generally when there were valid concerns
12 being raised in the organization at different times throughout
13 the organization there was always curriculum that was released
14 about that specifically helped reframe your perspective about
15 how to look at it and who to look at as the good guys and the
16 bad guys, you know, so to speak and who was being honorable
17 and who was being noble and so everybody who wanted to believe
18 this was good was given a lot of information about how
19 specifically to view it as good and why it was good but there
20 were very real and very valid allegations being made about
21 things that were true and we were lying about them so, you
22 know, and here we are so I don't --

23 THE COURT: I think we should break now.

24 THE WITNESS: Yeah.

25 MS. HAJJAR: Yes, Your Honor.

1 THE COURT: All right, members of the jury, we're
2 going to recess for the evening.

3 Let me remind you that it is very important that you
4 follow my instruction not to discuss the case with anyone, not
5 your family, your friends, your business associates or your
6 fellow jurors.

7 In addition, you must not read, listen to, watch or
8 access any accounts of the case on any form of media such as
9 newspapers, TV, radio, podcasts or the internet, nor should
10 you research or seek outside information about any aspect of
11 the case.

12 Please do not communicate with anyone about the case
13 on your phone, whether through email, text messaging or any
14 other means, through any blog or website or by way of any
15 social media including Facebook, Twitter, Instagram, YouTube
16 or other similar sites.

17 You must not consider anything you may have read or
18 heard about the case outside of this courtroom, whether you
19 read it before, during jury selection or during this trial and
20 do not attempt any independent research or investigation of
21 the case or visit any of the locations identified on the
22 questionnaire or discussed during the course of jury selection
23 or during the trial.

24 We'll see you tomorrow morning at 9:30. Thank you
25 very much for your attention.

1 All rise for the jury.

2 (Jury leaves courtroom.)

3 THE COURT: All right. The witness may stand down.
4 Please do not discuss your testimony with anyone. We'll see
5 you tomorrow morning at 9:30, ma'am.

6 THE WITNESS: Thank you.

7 (Witness steps down.)

8 THE COURT: Everyone else may be seated.

9 I want to take up the issue that you raised at the
10 end. I know what you're talking about and it's the issue
11 about Carly and the Crawford issue, isn't that right? Is that
12 what you're talking about?

13 MR. AGNIFILO: The Crawford issue, yes.

14 THE COURT: The Crawford issue.

15 MR. AGNIFILO: In regard to Kristin and Carly.

16 THE COURT: Well, the reason -- I don't have
17 realtime here because for some reason it didn't work this
18 afternoon so what I'd like to do is take a look at the
19 realtime and if you have a proposed instruction to the jury,
20 you can provide it to me and I'll deal with it first thing in
21 the morning.

22 MR. AGNIFILO: Very good. I'll do that, Judge.

23 THE COURT: And it's about both Kristin and Carly.

24 MR. AGNIFILO: Right. The testimony now is that
25 Kristin and Carly both said in words and substance that they

1 were lied to to join DOS, they joined DOS under false
2 pretenses and my concern is that's precisely a count of the
3 indictment that my client is charged with and I don't think
4 either of those people are going to testify so I'm never going
5 to have the opportunity to cross-examine them and I think we
6 have a Sixth Amendment confrontation issue.

7 THE COURT: I understand your argument.

8 And the government's position on this is, just so
9 that we put a finer point on it?

10 MS. HAJJAR: Your Honor, the timing of when these
11 claims were made and to whom they were made is critical to
12 understanding what happens afterwards. There are public
13 positions statements that are put out by NXIVM, efforts to
14 discredit these particular victims and NXIVM itself engages in
15 some -- in efforts to present a counter-narrative and so the
16 fact that Ms. Bronfman, the entire executive board,
17 Ms. Salzman is on notice of what the requests are and what's
18 being said about DOS and these people's experience in DOS is
19 important to establish why they did what they did and that
20 when they put out statements later saying DOS was a good
21 thing, that they were supportive of it, that no one got hurt,
22 that those statements were made with the knowledge that there
23 had been claims, specific claims made about and requests for
24 collateral back.

25 THE COURT: So, but are these representations being

1 made for the truth of the matter asserted which is exactly
2 what the defense is claiming here, that the argument is being
3 made and that because they are and because these individuals
4 are not appearing and being available for cross-examination,
5 that creates a Crawford issue. That's what I'm trying to get
6 down to here.

7 MS. HAJJAR: They're being offered for their effect
8 on Ms. Salzman and the executive board and for the fact that
9 they were made at the specific time, not the contents of the
10 email itself but the fact that that was the content of the
11 email that someone had been -- that these former DOS slaves
12 had talked about DOS, had said that their experiences were
13 negative and said that these materials were taken from them
14 under false pretenses and from fraud and nevertheless certain
15 actions were taken by the company and by the individual
16 recipients and so the timing of that communication and what
17 happened afterward is critical to explaining what NXIVM does
18 and what the defendants do in this period of time.

19 MR. AGNIFILO: The problem, Judge, is that the un-
20 cross-examinable factual assertions are precisely the content
21 of their charge on the wire fraud so I think it rings hollow.
22 I'll follow the Court's instruction, I'll give a proposed
23 instruction. I don't think we can instruct our way out of
24 this problem. I mean factual detailed assertions have been
25 made by people who I can never cross-examine that are

1 precisely the content of the charge. So, they can say it's
2 for the effect on the listener but it just so happens that
3 precisely what Carly and Kristin have now said through hearsay
4 to this jury and cannot be cross-examined on perfectly
5 reflects their wire fraud count.

6 THE COURT: Well, first of all, I kept the documents
7 out. It's impossible to -- we can't rewind the video here and
8 edit this out. I'm looking for a way if it's a problem, and
9 I'm not sure that it is frankly, if it's a problem, to give an
10 instruction and to do what you ask, to strike the testimony in
11 answer to that question and this happens all the time and if
12 it's done promptly, it doesn't create a problem should there
13 be a conviction and an appeal, in my view. So, this is the
14 way trials work. So, I don't want to hear about that this
15 can't be rectified if it's a problem, it's a small piece of a
16 large story and what I'm going to do is take a look at the
17 testimony, take a look at your arguments and then figure out
18 what to do and we'll roll right along from there.

19 Speaking of rolling right along, how much more do
20 you have for this witness?

21 MS. HAJJAR: I think at least half a day if not
22 more, Your Honor.

23 THE COURT: At least half a day.

24 MS. HAJJAR: But probably a little bit more than
25 that, going well into tomorrow.

1 THE COURT: Okay. And on cross-examination do you
2 have an estimate?

3 MR. AGNIFILO: A third of the direct.

4 THE COURT: I don't know what that means.

5 MR. AGNIFILO: I don't either.

6 THE COURT: Give me hours.

7 MR. AGNIFILO: It sounded nice.

8 THE COURT: Hours, I'm not good at fractions.

9 MR. AGNIFILO: Either am I. Four hours,
10 three hours, I don't know.

11 THE COURT: So, we're going to go into Wednesday on
12 this?

13 MR. AGNIFILO: I would think we are. I would think
14 we are.

15 THE COURT: Wednesday. All right. And do we know
16 who's next? I'm always hoping for the future.

17 MR. AGNIFILO: They told us and we appreciate them
18 telling us.

19 MS. PENZA: We can also notify the Court, Your
20 Honor.

21 THE COURT: I'd appreciate that. It would be nice
22 to know what you all know.

23 MS. PENZA: Yes.

24 THE COURT: Okay.

25 MR. AGNIFILO: I'm not sure it always is but I

1 understand.

2 THE COURT: Yes, thank you. Okay.

3 MS. HAJJAR: Your Honor, may I just raise one more
4 thing?

5 THE COURT: Oh, sure.

6 MS. HAJJAR: I'm sorry. There are four recordings
7 that the government intends to admit tomorrow through this
8 witness.

9 THE COURT: Yes.

10 THE CLERK: Mr. Agnifilo has represented that he
11 objects to their admission on the basis I think that this
12 witness, this cooperating witness was not physically present
13 during these recordings. We have -- we can notify the Court
14 as to which recordings they are should the Court want to
15 listen to them or identify which ones are the disputed
16 portions prior to tomorrow but we just wanted to let the Court
17 know that this was something that the parties did not agree
18 on.

19 MR. AGNIFILO: One of the things I was going to talk
20 to the government about when we were done today is I think
21 there's something in the direct examination where Ms. Salzman
22 listened to certain recordings in making certain
23 memorializations. What I don't know is whether any of the
24 four recordings they intend to play tomorrow are any of those
25 recordings. My concern is I don't know how she can

1 authenticate a conversation she wasn't present for. I mean
2 there are a number of women present for a conversation,
3 Ms. Salzman wasn't one of them and so I don't know how we can
4 say that this was certainly the conversation that took place
5 if she's not there to say I was present for the conversation,
6 I remember it, these are the people talking, that is what was
7 said and she can authenticate the audiotape.

8 THE COURT: Who were the people in the conversation?

9 MS. HAJJAR: These were recorded conversations of --
10 between the defendant and the first line of DOS, Your Honor.

11 THE COURT: Well, she was on the first line of DOS.

12 MS. HAJJAR: She was but these recordings took place
13 prior to her joining DOS. Nevertheless, she can identify the
14 content and explain it and identify all of the participants
15 and the government can also seek to introduce the testimony of
16 a law enforcement agent that recovered these recordings but
17 Ms. Salzman can explain the recordings and identify the voices
18 and we would ask that Your Honor consider the recordings
19 themselves. They're very clear as to what's happening, there
20 are no breaks, there's no reason to believe that they're not
21 authentic in some way. Ms. Salzman testified that the
22 recordings of the meetings of the first line were kept and
23 maintained and there's no reason to think that these
24 recordings are inauthentic in some way or doctored and she can
25 identify what's being said and by whom.

1 THE COURT: Well, do you want to take a break from
2 her testimony and put on a witness who can authenticate them
3 that they were received, you know, the law enforcement
4 officer? I'll allow that if it means that we just have to
5 take a small break. I mean is that preferable?

6 MR. AGNIFILO: No, no, what I think the better
7 course is let's -- I have a question that could possibly
8 resolve this because if she listened to these recordings in
9 doing something as part of her official duties, I think they
10 fall under one category; if she's never listened to them -- I
11 mean all we've heard in this case so far about the reliability
12 of recordings should cause us to have no confidence that a
13 recording is absolutely reliable, I mean the head of the video
14 department just talked about the four ways that he plays with
15 plugs and he does things and he does other things. So,
16 there's nothing in this record to suggest that just because a
17 video or audio was once made, it's absolutely 100 percent that
18 way for the rest of time. The state of the record is not that
19 at all, it is quite different.

20 But let's do this so maybe we can take this off Your
21 Honor's plate, we will talk, if we still have an issue we'll
22 tell Your Honor and we'll resolve the issue.

23 MS. HAJJAR: I suspect we will still have an issue
24 and I think --

25 THE COURT: Well, talk and let me know at 9:00

1 tomorrow morning, I'll be here.

2 MS. HAJJAR: Thank you, Your Honor.

3 MR. AGNIFILO: Thank you.

4 THE COURT: So will you.

5 MR. AGNIFILO: Yes, we will.

6 THE COURT: Thank you.

7 MR. AGNIFILO: Thank you, Judge.

8 THE COURT: Have a good night.

9 (Time noted: 5:20 p.m.)

10 (Matter adjourned to Tuesday, May 21, 2019 at
11 9:00 a.m.)

12 -oo0oo-

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14

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16 *I (we) certify that the foregoing is a correct transcript*
17 *from the record of proceedings in the above-entitled matter.*

18 */s/ David R. Roy*
DAVID R. ROY

20th day of May, 2019
Date

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INDEX

1829

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
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22
23
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L A U R E N S A L Z M A N

DIRECT EXAMINATION (CONTINUED)
BY MS. HAJJAR 1593

E X H I B I T S

Government's Exhibit Number 359 1611
Government's Exhibits 1403, 426, 427, 1404 1645
Government's Exhibit Numbers 356 and 356R 1726
Government's Exhibit Numbers 414 and 414R 1730
Government's Exhibit Numbers 357, 357R and 358 1737
Government's Exhibit 429 1754
Government Exhibit 425R 1763
Government Exhibit 432 and 432R 1768