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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -	X	
UNITED STATES OF AMERICA,	:	23-CR-146(DG)
Plaintiff ,	:	
-against-	:	United States Courthouse
	:	Brooklyn, New York
RACHEL CHERWITZ and	:	
NICOLE DAEDONE,	:	
Defendant.	:	May 13, 2025
- - - - -	X	9:30 a.m.

TRANSCRIPT OF CRIMINAL CAUSE FOR FURTHER JURY TRIAL
BEFORE THE HONORABLE DIANE GUJARATI and a JURY
UNITED STATES DISTRICT JUDGE

APPEARANCES:

For the Government:	JOSEPH NOCELLA, JR.
	Interim United States Attorney
	BY: KAITLIN T. FARRELL
	KAYLA C. BENSING
	NINA C. GUPTA
	SEAN M. FERN
	Assistant United States Attorneys
	271 Cadman Plaza East
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For Defendant Cherwitz:	BALLARD SPAHR LLP
	1675 Broadway, 19th Floor
	New York, New York 10019
	BY: CELIA COHEN, ESQ.
	MICHAEL P. ROBOTTI, ESQ.
	KELLY LIN, ESQ.
	SCHUYLER LA BARGE, ESQ.
	KELLY LENAHAAN-PFAHLERT, ESQ.

(Appearances continued on the next page.)

Court Reporter:	Annette M. Montalvo
	Official Court Reporter

1 Appearances: (Cont'd)

2

3 For Defendant Daedone: BONJEAN LAW GROUP, PLLC
4 303 Van Brunt Street, 1st Floor
5 Brooklyn, NY 11231
6 BY: JENNIFER A. BONJEAN, ESQ.
7 KELSEY KILLION, ESQ.
8 ASHLEY COHEN, ESQ.

7

8

9

10 Also Present:

11 Liam McNett, Paralegal, US Attorney's Office
12 Marlane Bosler, Paralegal, US Attorney's Office

12

13 Galila Assefa, Paralegal, Bonjean Law Group
14 Sophia Moazed, Paralegal, Bonjean Law Group

14

15

16

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18 Proceedings reported by machine shorthand, transcript produced
19 by computer-aided transcription.

19

20 Court Reporter: Annette M. Montalvo, CSR, RDR, CRR
21 Official Court Reporter
22 United States Courthouse, Room N375
23 225 Cadman Plaza East
24 Brooklyn, New York 11201
25 718-804-2711

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PROCEEDINGS

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P R O C E E D I N G S

(In open court; jury not present.)

THE COURTROOM DEPUTY: All rise.

*United States of America against Rachel Cherwitz
and Nicole Daedone.*

Is the Government ready?

MS. BENSING: Yes.

Kayla Bensing, Kaitlin Farrell, Nina Gupta, and
Sean Fern, joined by paralegal specialist Liam McNett and
FBI Special Agent Christine Meyer.

Good morning.

THE COURT: Good morning.

MS. COHEN: Good morning, Your Honor.

Celia Cohen, Michael Robotti, Kelly Lin, here on
behalf of Rachel Cherwitz.

THE COURT: Good morning to all of you.

MS. BONJEAN: Jennifer Bonjean, B-O-N-J-E-A-N,
along with attorney Kelsey Killion and Ashley Cohen, who
should be here any second; they're just out grabbing
something. And then a paralegal, Galila Assefa. I got it
wrong yesterday.

THE COURT: Good morning, everyone. Everyone may
be seated.

I think we're waiting for one juror, but I wanted

PROCEEDINGS

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1 to address a few things with the parties. One I think we
2 could address quickly is just if anyone wanted to be heard
3 on the jury notes. My suggestion is that at the end of the
4 day, so that we don't have to kind of pull a juror away in
5 the middle from the group, is just to ask Juror No. 5, who's
6 the one with the dental issue, just to stay and maybe
7 collect a bit more information about if there's flexibility,
8 if he's in pain, you know, that kind of -- or does this have
9 to happen that particular day.

10 But I'll hear the parties on that.

11 MS. BENSING: That makes sense to the Government,
12 Your Honor.

13 MS. COHEN: Yeah, that makes sense, Your Honor.
14 In addition, I think as you said yesterday, perhaps we can
15 start an hour later or end an hour --

16 THE COURT: Or end earlier or something, yeah.

17 MS. COHEN: Yes.

18 THE COURT: Or perhaps the doctor could come in --

19 MS. COHEN: Could accommodate.

20 THE COURT: -- on a different day. Okay.

21 So I also want to address the motions that were
22 filed last night. One is regarding text messages, and
23 that's at ECF No. 374, that's the sealed version, and 375 is
24 the publicly-filed version.

25 Based on what I know at this time, I'm not

PROCEEDINGS

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1 inclined to allow the entirety of the text messages at issue
2 to come in, but whether any particular text or portion is
3 admitted is going to depend I think in part on the
4 testimony, at least. But we can sort of address that when
5 it comes up.

6 The next motion was regarding a video, and that's
7 at ECF No. 376. And more specifically, it's a video clip,
8 which I have watched. Based on the current record, I will
9 not permit the admission of the video clip. Although
10 explicit videos and/or photographs may very well be relevant
11 and admissible, that will depend on specifics. And with
12 respect to the record as it stands and the arguments of the
13 parties and the video clip itself, I am not going to permit
14 the admission of that clip.

15 That is all that I had to take up before the jury
16 comes. Is there anything else we need to address? And
17 again, at the end of the day, we'll have Juror No. 5 just
18 stay behind -- or we'll let everybody out and then have him
19 come in.

20 Okay. I'm going to give you all a few minutes to
21 continue to consult with your teams, and hopefully the jury
22 will all be here momentarily.

23 Okay. We'll recess.

24 (Court is in recess.)

25 THE COURT: Okay. We're back on the record, and

PROCEEDINGS

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1 we have the jury all here.

2 Does the Government want to get the witness on the
3 stand? And we'll bring out the jury, as well.

4 (Witness takes the stand.)

5 THE COURT: Good morning.

6 (Jury enters.)

7 THE COURT: Everyone may be seated.

8 Good morning to the jury.

9 And, Government, you may call your next witness.

10 MS. GUPTA: Thank you, Your Honor.

11 The Government calls Dana Gill.

12 (Witness sworn.)

13 THE COURTROOM DEPUTY: You may be seated.

14 State your full name for the record, spell your
15 last name slowly, and speak into the microphone.

16 THE WITNESS: Dana Michelle Gill. And you said
17 spell the last name; is that right?

18 THE COURTROOM DEPUTY: Yes, please.

19 THE WITNESS: G-I-L-L.

20 THE COURT: You may proceed.

21

22 (Continued on the next page.)

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GILL - DIRECT - MS. GUPTA

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1 **DANA MICHELLE GILL,**

2 called as a witness, having been first duly
3 sworn/affirmed, was examined and testified as
4 follows:

5 DIRECT EXAMINATION

6 BY MS. GUPTA:

7 Q Good morning, Ms. Gill.

8 A Good morning.

9 Q Do you know someone named Nicole Daedone?

10 A I do.

11 Q How do you know her?

12 A She was the founder of OneTaste, or is the founder of
13 OneTaste.

14 Q Do you know someone named Rachel Cherwitz?

15 A I do.

16 Q How do you know her?

17 A I lived with her at 1080, and she was involved in
18 OneTaste as well.

19 Q What is OneTaste?

20 A OneTaste is a company that focuses on something called
21 orgasmic meditation, and they -- they teach about female
22 sexuality and orgasm.

23 Q You mentioned that Nicole Daedone was the founder of
24 OneTaste.

25 A Uh-huh.

GILL - DIRECT - MS. GUPTA

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1 Q Did she have any other role?

2 A Not -- not that I'm aware of. Like, she was part --
3 actively participating in the life of OneTaste, but no other
4 title, as far as I know.

5 Q And did Rachel Cherwitz have a title at OneTaste?

6 A She -- her titles varied. The main one that I remember
7 is head of sales.

8 Q Do you see Nicole Daedone in the courtroom today?

9 A Yes, I do.

10 Q Could you identify her by an article of clothing or
11 where she's seated?

12 A She's standing now; she's in tan.

13 MS. GUPTA: And, Your Honor, we would let the
14 record reflect that the witness has identified the
15 defendant.

16 THE COURT: Yes.

17 Q While you were at OneTaste, did Nicole Daedone cause
18 you any harm?

19 MS. BONJEAN: Objection.

20 THE COURT: Sustained.

21 You can ask your next question.

22 Q While you were at OneTaste, Ms. Gill, did you suffer
23 any financial harm?

24 MS. BONJEAN: Objection.

25 THE COURT: Overruled.

GILL - DIRECT - MS. GUPTA

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1 A I -- I -- yes. I -- I ended up having to not take out
2 debt, but go into debt with OneTaste in order to pay for
3 courses and stuff.

4 Q While you were at OneTaste, did you suffer any
5 psychological harm?

6 MS. BONJEAN: Objection.

7 THE COURT: Overruled.

8 THE WITNESS: That means that I can go, right?

9 THE COURT: Yes, yes. You may answer if I say
10 overruled.

11 THE WITNESS: Thank you.

12 A Can you repeat the question?

13 Q Yes.

14 While you were at OneTaste, did you suffer any
15 psychological harm?

16 A Yes.

17 Q What was the nature of that psychological harm?

18 A I was -- I regularly had my intuition challenged and
19 overruled, so I learned to dismiss my inner voice. I was
20 taught to -- or I was trained to become a sacred prostitute,
21 which is a far deviation from my values. And I became only
22 known -- and I internalized that the only value that I have
23 is my sexual abilities.

24 Q Who, if anyone, at OneTaste called you a sacred
25 prostitute?

GILL - DIRECT - MS. GUPTA

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1 A Yia Vang and Nicole Daedone.

2 Q What role, if any, did Nicole Daedone have in your
3 financial and psychological harm that you just described?

4 MS. BONJEAN: I'm sorry. Objection.

5 THE COURT: Basis?

6 MS. BONJEAN: Foundation, form.

7 THE COURT: I'm going to sustain the objection.

8 You can ask a different question.

9 Q Did Nicole Daedone at all contribute to the harm that
10 you just described?

11 A Yes, she did.

12 Q In what way?

13 A She directly and indirectly trained me to be a sacred
14 prostitute. She convinced me, both directly and indirectly,
15 that I couldn't be in relationships that I wanted to be in
16 or felt like were right and appropriate for me. And she had
17 me service her boyfriend.

18 Q Who was her boyfriend?

19 A Reese Jones.

20 Q And at a high level, when you say "service her
21 boyfriend," what do you mean by that?

22 A Take care of sexually.

23 Q Do you see Rachel Cherwitz in the courtroom today?

24 A Yes, I do.

25 Q Can you identify her by an article of clothing she's

GILL - DIRECT - MS. GUPTA

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1 wearing or where she's seated?

2 A Also wearing tan and standing now.

3 MS. GUPTA: And, Your Honor, we would let the
4 record reflect that the witness has identified Rachel
5 Cherwitz.

6 THE COURT: Yes.

7 Q So you've described financial and psychological harm
8 that you suffered at OneTaste.

9 What, if any, role did Rachel Cherwitz play in
10 that harm?

11 A She -- she would listen to my fear inventories and knew
12 the personal depths of my --

13 MR. ROBOTTI: Objection.

14 THE COURT: Basis?

15 MR. ROBOTTI: Testifying to defendant's knowledge.

16 THE COURT: Overruled.

17 Q You may continue.

18 A So she knew the depths of my fears and insecurities,
19 and she would at times love bomb me, when -- especially when
20 I was wanting -- when I was talking overtly about leaving.

21 Q You mentioned something called a "fear inventory."

22 A Uh-huh.

23 Q What is that?

24 A It's a -- it was encouraged to be a daily practice, and
25 it was writing out almost like a prayer, but it was listing

GILL - DIRECT - MS. GUPTA

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1 all of your deepest fears, and they asked you to go deeper
2 with each unresentful act, blah, blah, blah, so that you
3 were kind of, like, listing and uncovering all of the things
4 that you were afraid of or worried about, concerned about.

5 Q And did you share those fear inventories with Rachel
6 Cherwitz?

7 A Yes. She was one of the -- she was the primary person
8 I would read my inventories to.

9 Q What was the practical effect, if any, of sharing your
10 deepest fears with Rachel Cherwitz?

11 MS. BONJEAN: Objection to form.

12 THE COURT: Yes, sustained.

13 Q What was the practical effect of sharing your fear
14 inventory with Rachel Cherwitz?

15 MS. BONJEAN: Objection.

16 THE COURT: I think it's basically the same
17 question. Sustained.

18 Q You also mentioned love bombing. What do you mean by
19 that?

20 A Love -- I mean, she would, like, put attention on me in
21 a way that had me feel seen and loved in a new way. For
22 instance, there was this one course where I had been talking
23 about leaving and moving back to Hawaii, because that's
24 where I had recently moved from, and it was my birthday, and
25 we were going around the circle and she pulled me up to the

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1 front of the room, almost like a Hot Seat sort of situation,
2 and had everyone go around the room and say the thing that
3 they loved about me. And then I was gifted a necklace that
4 all of the in people got. And it just made me feel like,
5 oh, yeah, I am loved, they're not trying to manipulate me
6 like I had been worried about and wanting to leave because
7 of.

8 Q Did you then stay at OneTaste?

9 A I did.

10 Q Now, you mentioned earlier that one of the services
11 OneTaste offered while you were there was orgasmic
12 meditation.

13 A Uh-huh.

14 Q Was that sometimes referred to as OM?

15 A It was.

16 Q Did OneTaste offer any other services aside from OM?

17 A Yes. They offered a wide variety of courses, coaching
18 programs. The courses outside of OM were, like, men's
19 courses and women's courses and -- I can't even remember.
20 There were a lot of courses.

21 Q Did OneTaste offer any sexual services?

22 A I would say so, yes.

23 Q What kind?

24 A I would call orgasmic meditation a sexual service.

25 Q Approximately when were you involved with OneTaste?

GILL - DIRECT - MS. GUPTA

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1 A Late 2009, maybe early 2010, until 2013.

2 Q And what was your role in OneTaste?

3 A I -- I was a participant. I took some coaching
4 programs, two of them, parts of them. And I worked
5 back-of-house courses, I helped with TurnON events. I kind
6 of did a little bit of everything.

7 Q Did you have any titles while you were at OneTaste?

8 A Only informal one.

9 Q What were the informal titles?

10 A TurnON bunny, Mother Teresa of orgasm, TurnON fairy,
11 fluffer.

12 Q What is a TurnON bunny?

13 A Someone who is bright and shiny and excited and gets
14 other people excited about OneTaste.

15 Q What, if anyone, gave you that title?

16 A In my memory, it's Rachel Cherwitz.

17 Q You mentioned fluffer. What does that mean?

18 A It means to get someone prepared to be in a leadership
19 role and get them turned on and ready to lead so that
20 they're bright and shiny and full of what they call orgasm.

21 Q And practically speaking, what did you do in that role?

22 A I would fondle people -- it was usually only one
23 person, so I would fondle her, flirt with her, kiss her
24 neck, that sort of thing.

25 Q And for what purpose would you do that?

GILL - DIRECT - MS. GUPTA

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1 A To get her turned on enough that she would be ready to
2 lead.

3 Q Lead what?

4 A Whatever course she was about to lead, or an OM demo;
5 one or the other.

6 Q And who, if anyone, gave you the title of fluffer?

7 A I think it was Rob Kandell, I'm pretty sure.

8 Q You also mentioned the phrase TurnON fairy. Is that
9 different from TurnON bunny?

10 A Not really. It's just a synonymous term.

11 Q Were there any other TurnON bunnies or TurnON fairies
12 at OneTaste while you were there?

13 A Yes, there were.

14 Q Who were they?

15 A Michelle, Maddie, Aubrey, Maya, Liana. Those were the
16 main ones in my mind.

17 Q Could you provide last names of those individuals, if
18 you know them?

19 A Yes. Maya Gilbert, Aubrey Fuller, Maddie Carl, and
20 Michelle Wright. And Liana Lifson, sorry, that was the
21 other person.

22 Q So you mentioned some work that you performed for
23 OneTaste. You mentioned back-of-house, for example. Can
24 you describe what that means?

25 A Yeah. Back-of-house was making sure that the courses

GILL - DIRECT - MS. GUPTA

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1 and the programs ran smoothly. So you would be setting --
2 you would set up for the course, you would also make sure
3 that there is tea and snacks available. And then during the
4 course itself, you would usually be texting with various
5 people to make sure that the people who are running it were
6 well taken care of and had the support that they needed. So
7 I would, like, run and get lunch for someone, for example,
8 or whatever was needed in the moment.

9 Q In addition to back-of-house, did you perform any other
10 labor or services for OneTaste?

11 A Yeah. It varied depending on the season of my time at
12 OneTaste. But I did some PR and marketing stuff, I would do
13 lead generation. I'm pretty sure I got involved --
14 actually, I know I got involved in sales, though I sucked at
15 it. And then I was also involved in courses, but that
16 wasn't work necessarily.

17 Q In addition to performing the tasks that you just
18 described, did you perform any sexual services while you
19 were at OneTaste?

20 A Yes.

21 Q And at a high level, what kinds of sexual services did
22 you perform?

23 A I would OM with clients. I had a strap-on on me for a
24 cock sucking demonstration at one point, and then I also
25 serviced Reese Jones.

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1 Q What, if anyone, directed you to perform the sexual
2 services that you just described?

3 A Any of the core team for the OM partners. It was
4 usually for newer complaints.

5 MS. BONJEAN: Objection to foundation.

6 THE COURT: Overruled.

7 Q Were you paid money to perform any of the forms of
8 labor and services that you just described?

9 A I -- to my knowledge, I never received a check. It was
10 payment in kind.

11 Q I want to take a step back and start at the beginning.

12 First, where did you grow up?

13 A Southern California.

14 Q Can you describe the kind of upbringing that you had?

15 A Yeah.

16 I was raised in a very loving household that was
17 also very conservative. My parents had very traditional
18 values and patriarchal values, and any deviation from what
19 my father, who was the head of the household, said was okay
20 was -- it wasn't allowed, right? So I had to stay within
21 those patriarchal systems of family values. And that also
22 meant that any authority figure was never challenged. If
23 you -- if they said you jump, then you say how high.

24 Q And how was sex treated in your upbringing?

25 A It wasn't -- it wasn't really talked about. Sex was

GILL - DIRECT - MS. GUPTA

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1 something that you only did in the context of a marriage,
2 and that part of me was -- had to be very suppressed in my
3 young childhood and adult life.

4 Q In your view, did your upbringing later affect your
5 experience in OneTaste?

6 A Absolutely.

7 Q How?

8 A I wasn't able to -- I didn't have the capacity within
9 myself to challenge authority. So if someone who was my
10 superior suggested something about my identity, I listened
11 to them because I was a lost young adult. My brain wasn't
12 fully developed. Yeah.

13 Q Did you attend college?

14 A I did.

15 Q What did you study?

16 A English and French in undergrad.

17 Q What did you do after completing your undergraduate
18 education?

19 A I did a little bit of work, and I moved to Hawaii to do
20 a whole lot of nothing, and then I moved back to the
21 mainland because my mom had gotten sick, and that's when I
22 ended up getting -- and then I found some is very rowdy
23 friends, and that's when I ended up finding OneTaste.

24 Q And when, approximately, did you first learn about
25 OneTaste?

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1 A Late 2009, if I had to make my best guess.

2 Q How old were you then, approximately?

3 A 25, if I'm remembering correctly.

4 Q And how did you first learn about OneTaste?

5 A My friend, Aubrey Fuller, told me about it. She had
6 been living at 1080.

7 Q And at that time that you first learned about OneTaste,
8 where were you living?

9 A I was living with my boyfriend at the time, Malechai.

10 Q And how were you supporting yourself at that time?

11 A I had no job. I had just lost my job because it was
12 right after the economic crash of 2008 and I had been
13 teaching.

14 Q What was your financial situation at the time?

15 A Dismal.

16 Q What was the first OneTaste event that you attended?

17 A It was a TurnON event.

18 Q What is a TurnON?

19 A It's a space where they play games, as they call it.

20 You kind of go around and -- I'm forgetting what they called
21 that first game. But you would, like -- you know, if my sex
22 was a kitchen item, what kitchen item would it be, right?

23 And everyone would go around and answer that question.

24 The main thing that I remember from TurnON is what
25 they call the Hot Seat.

GILL - DIRECT - MS. GUPTA

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1 Q What was Hot Seat?

2 A It was where one person was brought up to the front of
3 the room to sit on a chair, and people could ask, one at a
4 time, any question that they wanted. I mean, you could pass
5 on the Hot Seat, but it was -- it was poo-poo'd to pass.

6 Q Did you end up in the Hot Seat at any point?

7 A I did.

8 Q Did you share anything about yourself?

9 A I did.

10 Q What did you share?

11 A I don't recall everything that I shared. The one main
12 memory that I have from that TurnON is Rachael Hemsli -- we
13 were talking about my family life and my upbringing, and she
14 asked me if I had a good relationship with my mom, and I
15 said, yes, I have a great relationship with my mom. And she
16 looked very confused, and then I was dismissed from the Hot
17 Seat.

18 Q Did you share your strict upbringing at that time?

19 A I did.

20 Q Who else from OneTaste, in addition to Rachael Hemsli,
21 attended the event?

22 A Rob Kandell and Rachel Cherwitz. Those are the only --
23 like, of the core team, those are the only ones I remember
24 in my mind.

25 Q After enrolling in the TurnON event, did you attend any

GILL - DIRECT - MS. GUPTA

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1 additional OneTaste courses?

2 A I did. I signed up for the coaching -- the first
3 coaching program pretty shortly thereafter, to my memory.

4 Q What was the coaching program?

5 A It was -- I don't even remember how long it was
6 supposed to be, but it met monthly and it had a three-tier
7 system of relationship coaching, OM coaching, and something
8 else that I don't remember at the moment.

9 Q Who, if anyone, signed you up for the coaching program?

10 MS. BONJEAN: Objection to the form of that
11 question.

12 THE COURT: Overruled.

13 Q You can answer.

14 A Thank you. I keep forgetting.

15 I mean, Rachel Cherwitz was the salesperson in
16 that moment.

17 Q Approximately how much did the coaching program cost?

18 A \$20,000.

19 Q And you mentioned earlier that your financial condition
20 at the time was dismal, so what was the plan for how you
21 were going to pay for the coaching program?

22 A I didn't necessarily have a plan. I knew that I wanted
23 to sign up for it, I was very excited about it, and I'm
24 pretty sure it was a \$20 bill. I gave her something in that
25 moment, and it was the only money that I had to my name in

GILL - DIRECT - MS. GUPTA

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1 the moment, and she said don't worry about it, we'll figure
2 it out, we can raise money.

3 Q And did you, in fact, raise money?

4 A I raised a very small amount, but yes, I did raise some
5 money.

6 Q How did you raise money?

7 A I had a bake sale at 1080, and I had a silent auction.

8 Q Did you raise the full \$20,000 that you needed through
9 the bake sale and the silent auction?

10 A No. I ended up -- my finances were so bad, I ended up
11 signing up for Sugardaddy.com to help pay for it.

12 Q What is Sugardaddy.com?

13 A It's a website that connects well-off men with young
14 women who are looking for money, to be cared for.

15 Q Where did you get the idea to sign up for
16 Sugardaddy.com?

17 MS. BONJEAN: Objection. Assumes facts not in
18 evidence.

19 THE COURT: Overruled.

20 Q You can answer.

21 A Thank you.

22 Aubrey Fuller signed me up for it. She had gotten
23 into sex work, and I felt -- I was happy that she was
24 feeling empowered doing it, but it was definitely a far
25 deviation from my values. And then eventually my financial

GILL - DIRECT - MS. GUPTA

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1 situation got so dire that it became -- and I then exposed
2 to her experiences and stories around it that I was like,
3 oh, okay, this might not be so bad, Sugardaddy is a good
4 first step.

5 MS. GUPTA: Could we show the witness Government
6 Exhibit 292, which is in evidence. And I believe this is in
7 evidence, so the jury should be able to see it, as well.

8 Thank you.

9 THE COURT: Give me one moment.

10 MS. GUPTA: Sure.

11 THE COURT: Yes, go ahead.

12 MS. GUPTA: Thank you.

13 (Exhibit published.)

14 Q Do you recognize this person?

15 A I do.

16 Q Who is it?

17 A Aubrey Fuller.

18 Q And what was her role in OneTaste at the time?

19 A She was a participant. She was also a rising star, as
20 some of us talked about. She was well liked among the core
21 staff and got in with pretty closely -- she was closely knit
22 with them.

23 Q Did you finish the coaching program that you signed up
24 for?

25 A I did not.

GILL - DIRECT - MS. GUPTA

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1 Q Why not?

2 A Because I had started dating Billie Stubblebine and the
3 relationship got manipulated, and I was very upset that they
4 broke us up.

5 Q What do you mean by "the relationship got manipulated"?

6 A Justine Dawson, the president of OneTaste, started
7 seeing Billie and, from my perspective, kind of stole her
8 from me. In my memory, I knew that it was an intentional
9 move. They would mock me for being in a lesbian
10 relationship every so often. Like, I remember Nicole being
11 like, oh, look, the lesbians are here, and it was not a, oh,
12 look, the lesbians are here, it was a little bit
13 mean-spirited from my perspective. And I was just -- I was
14 gutted that Billie left me for Justine. And then as soon as
15 Billie left me, Justine broke up with her.

16 Q And why did you believe that Justine was acting
17 intentionally?

18 A I mean, it seemed too convenient that as soon as -- as
19 soon as Billie broke up with me, that Justine was like, and
20 I'm done, bye. That's really the only thing -- actually,
21 no, that's not true. Later on in the coaching program, I
22 briefly chatted with Justine about it and I had already
23 started to shift my perspective and I was starting to
24 consume the jargon, and I was like thank you so much for
25 intervening, I can see how that relationship was bad for me,

GILL - DIRECT - MS. GUPTA

1243

1 and she was like, oh, you're welcome.

2 Q I'd like to show you some photographs now. Let's start
3 with Government Exhibit 306, which is in evidence.

4 (Exhibit published.)

5 Q Do you recognize this person?

6 A I do.

7 Q Who is it?

8 A Nicole Daedone.

9 Q Now, we've talked about Nicole Daedone a little bit.
10 Did you interact directly with her during your time at
11 OneTaste?

12 A Very rarely.

13 Q Under what circumstances did you interact?

14 A The majority of my interactions with her were either
15 when she was in the front of the classroom during coaching
16 program stuff, teaching, or when it was just, like,
17 one-on-one direct, it was when I was working with Yia as
18 Yia's assistant or towards the end of my tenure when I was
19 servicing Reese. But she kind of coached me -- I had a
20 horrible miscarriage, and I reached out to her and she kind
21 of helped me through it.

22 Q And where did Nicole Daedone fit into the OneTaste
23 hierarchy during your time at OneTaste?

24 A She was -- she was god.

25 MS. GUPTA: Can we pull up Government Exhibit 309.

GILL - DIRECT - MS. GUPTA

1244

1 MS. FARRELL: Your Honor, may I approach the board
2 while she's doing that?

3 THE COURT: Yes, go ahead.

4 (Exhibit published.)

5 Q Do you recognize this photo?

6 A I do.

7 Q Who is it?

8 A Rachel Cherwitz.

9 Q Where did Rachel Cherwitz fit into the OneTaste
10 hierarchy during your time there?

11 A She was also one of the primary core staff. She did a
12 lot of sales, and she was very, very close with me. I had
13 bonded with her pretty closely, yeah.

14 MS. GUPTA: Could we pull up Government
15 Exhibit 201, please, which is also in evidence.

16 (Exhibit published.)

17 Q Do you recognize this person?

18 A I do.

19 Q Who is it?

20 A Joanna van Vleck.

21 Q And what was her role at OneTaste?

22 A She was president after Justine Dawson.

23 Q Where did she fit into the OneTaste hierarchy?

24 A She was part of the core staff.

25 Q In how much interaction, if at all, did you have with

GILL - DIRECT - MS. GUPTA

1245

1 Joanna van Vleck?

2 A I interacted with her. I don't recall having a ton of
3 interactions with her outside of, like, outside smoking
4 cigarettes kind of thing.

5 MS. GUPTA: Could we pull up Government
6 Exhibit 211, which is also in evidence.

7 (Exhibit published.)

8 Q Do you recognize this person?

9 A I do.

10 Q Who is it?

11 A Justine Dawson.

12 Q And is this the individual we were just discussing who
13 began dating your girlfriend?

14 A Yes.

15 Q You mentioned earlier that she was president of
16 OneTaste. How did she fit into the OneTaste hierarchy?

17 A She was part of the core staff, as well.

18 Q What, if anything, did she do after she was president?
19 If you know.

20 A No, I have no idea. I mean, she stuck around, but I
21 don't remember what her role was.

22 MS. GUPTA: Can we go to Government Exhibit 290,
23 which is also in evidence.

24 (Exhibit published.)

25 Q Do you recognize this person?

GILL - DIRECT - MS. GUPTA

1246

1 A Yia Vang.

2 Q What was her role at OneTaste?

3 A To my recollection -- she was core staff, and to my
4 recollection, she was Nicole's assistant.

5 Q Did you ever perform any work for Yia Vang?

6 A I did. I became her apprentice.

7 Q And what did it mean to be her apprentice?

8 A I would work with her and she was training me in her --
9 in her words, she said that Nicole wanted me to --

10 MS. BONJEAN: Objection. Hearsay. Double
11 hearsay.

12 THE COURT: Response?

13 MS. GUPTA: Your Honor, it's the defendant's
14 statement. Statement of a party opponent.

15 THE COURT: Overruled.

16 You're asking about Ms. Vang, correct?

17 MS. GUPTA: Correct.

18 THE COURT: Overruled.

19 MS. GUPTA: Oh --

20 THE COURT: I'm sorry, I'm sorry. Sustaining the
21 objection. Ask the next question.

22 MS. GUPTA: Understood.

23 THE COURT: Apologies.

24 Q I think my question was: So what did you do in your
25 role at Yia Vang's apprentice?

GILL - DIRECT - MS. GUPTA

1247

1 A I was training to be a sacred prostitute. I was
2 essentially the assistant to Nicole's assistant. So I would
3 go and plant -- I planted something in Reese's garden that
4 was Nicole's garden. I relandscaped it. I would run and
5 get food for Nicole, make her tea. There was a lot of
6 plating issues that had to be concerned over.

7 MS. GUPTA: Could we go to Government Exhibit 242,
8 which is also in evidence.

9 (Exhibit published.)

10 Q Do you recognize this person?

11 A I do.

12 Q Who is it?

13 A Eli block.

14 Q And what was his role at OneTaste?

15 A When I was there, he was an enrollee in the same way
16 that I was, and he very quickly, later on in my time at
17 OneTaste, climbed the ranks and became core staff.

18 Q You used the term "core staff" a couple of times. What
19 does that mean?

20 A It was all of the leaders of OneTaste, the people who
21 were often teaching courses and teaching the students, which
22 is what I would consider myself to be.

23 MS. GUPTA: Could we pull up Government
24 Exhibit 302, which is also in evidence.

25 (Exhibit published.)

GILL - DIRECT - MS. GUPTA

1248

1 Q Do you recognize this person?

2 A I do.

3 Q Who is it?

4 A Maya Gilbert or Block.

5 Q What was her role at OneTaste during your time there?

6 A Same as Eli. She was a student that was climbing the
7 ranks pretty quickly and eventually became core staff.

8 MS. GUPTA: Could we pull up Government
9 Exhibit 281.

10 (Exhibit published.)

11 Q Do you recognize this person?

12 A I do.

13 Q Who is it?

14 A Rachael Hemsli.

15 Q And what was her role at OneTaste?

16 A She was kind of the house mom and would run 1080.

17 MS. GUPTA: Could we pull up Government
18 Exhibit 221.

19 (Exhibit published.)

20 Q Do you recognize this person?

21 A I do.

22 Q Who is it?

23 A Rob Kandell.

24 Q What was his role at OneTaste?

25 A He was cofounder with Nicole, and he was the tech guy.

GILL - DIRECT - MS. GUPTA

1249

1 Q You mentioned 1080 a few times. What is 1080?

2 A 1080 was the primary residence for OM in San Francisco
3 at 1080 Folsom Street.

4 Q Did there come a time when you moved into the
5 residence?

6 A Yes.

7 Q Where was it located?

8 A 1080 Folsom Street in San Francisco.

9 Q Can you describe how you came to live at 1080?

10 A Yeah.

11 I was living with my boyfriend at the time,
12 Malechai, and I had just signed up for the coaching program,
13 and I did not realize it at the time, but Malechai was
14 heavily addicted to narcotics and came home loaded one night
15 and started a fight with me and started throwing things at
16 my head. So when I -- when he passed out, I packed up my
17 stuff and moved out.

18 That next day I called Rachel Cherwitz, because
19 she was my main point of contact, and I was like I don't
20 know what to do, I don't know where I'm going to go, and she
21 was like come here, you can come live at 1080, which was a
22 huge relief because I had no idea where I was going to be
23 going.

24 Q And when, approximately, did you move into 1080?

25 A If I am remembering correctly, early 2010, probably,

GILL - DIRECT - MS. GUPTA

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1 very late 2009.

2 Q Approximately how many people lived there at that time?

3 A When I first moved in, there were very few people
4 there. I'm very bad at counting beans in a jar, but if I
5 had to guess, it would be around 15 to 20.

6 Q And did that change over time?

7 A Yes, it got more populated as I lived there.

8 Q Did OneTaste charge you rent?

9 A Yes.

10 Q How much was it, approximately?

11 A If my memory serves me, it was 900 a month to share a
12 room.

13 Q How did you pay for the rent?

14 A I had my sugar daddy. That was not being as lucrative
15 as I needed it to be, so I ended up signing up for Redbook,
16 and I also got a legitimate -- what people would consider a
17 legitimate job working at a company in the Mission District
18 called Lilah Belle's.

19 (Continued on the following page.)

20

21

22

23

24

25

Gill - Direct - Gupta

1251

1 BY MS. GUPTA: (Continuing.)

2 Q What is Redbook?

3 A Redbook is a website for sex workers.

4 Q And how did you come to sign up for that website?

5 A Aubrey was on it and she signed me up for it.

6 Q Did she create your profile?

7 A She did.

8 Q And you had mentioned earlier that Aubrey Fuller also
9 signed you up for sugardaddy.com?

10 A Yes.

11 Q And likewise, did she create the profile for that
12 account?

13 A She did.

14 Q And then, you also said you worked somewhere called Lilia
15 Bell's, what was that job?

16 A It was a to-go food restaurant; organic to-go food
17 restaurant.

18 Q Where did you direct your rent payments?

19 A To Caravan Retreats, Rachael Hemsli.

20 Q What was your understanding, if any, of how Caravan
21 Retreats was related to OneTaste?

22 A It was a doing business as; a d/b/a.

23 MS. GUPTA: I would like to show the witness only
24 what's marked as Government Exhibit 34.

25 (Exhibit published to witness only.)

Gill - Direct - Gupta

1252

1 BY MS. GUPTA:

2 Q Do you recognize this?

3 A Yes.

4 Q What is it?

5 A 1080.

6 Q How do you recognize it?

7 A It looks exactly like the building that I lived in for a
8 number of years.

9 Q Is Government Exhibit 34 a fair and accurate depiction of
10 1080, where you lived while you were affiliated with OneTaste?

11 A It is. It looks a little different, but it is.

12 MS. GUPTA: Your Honor, we move to admit Government
13 Exhibit 34.

14 THE COURT: Any objection?

15 MS. BONJEAN: No objection.

16 MR. ROBOTTI: No objection.

17 THE COURT: Government Exhibit 34 is admitted.

18 MS. GUPTA: Thank you.

19 Can we publish to the jury? Thank you.

20 (Government Exhibit 34 received in evidence.)

21 (Exhibit published.)

22 BY MS. GUPTA:

23 Q Can you point out here for the jury which of these
24 buildings is 1080?

25 A It's the brown building with the dark brown shutters.

Gill - Direct - Gupta

1253

1 Q Could you describe the space at 1080?

2 A Sure. You would walk in the -- the rightmost door. It's
3 not on the right, but it's the rightmost door. And you would
4 walk into the living room and behind the living room was
5 dining room and kitchen. And just to the right was the office
6 space that was also used for morning practice.

7 And then the leftmost door, they went into the same
8 area, but it -- that one went directly into the stairs to go
9 up to the second and third stories.

10 The second story was where newbies were put because
11 there were a lot more restrictions. And the third story was
12 where the core staff slept and there were far less
13 restrictions.

14 Q What were the restrictions in place on the second floor?

15 A You couldn't walk around naked when going to the showers
16 or just, in general. And the showers were separated stalls
17 whereas on the third floor there were no stalls in the
18 showers, it was just a giant wet room.

19 Q Did you have your own room?

20 A No.

21 Q How many people did you share your room with?

22 A One.

23 Q Did you have your own bed?

24 A No.

25 Q How was your bed assigned to be shared?

Gill - Direct - Gupta

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1 A I -- to my recollection, I got to choose to a certain
2 degree. I ended up rooming with Henry who, I felt very
3 fortunate, because he was an engineer for Doctors Without
4 Borders, and the earthquake in Haiti had just happened so he
5 was gone a lot, so I ended up getting a private room
6 essentially.

7 Q To your knowledge, did most people on the second floor
8 share a bed?

9 A Yes, to my knowledge.

10 Q While you were living at 1080, did you have any privacy?

11 A I don't feel like I did.

12 Q Why not?

13 A Everything was communal. People would walk in. Doors
14 were rarely closed unless there was an OM happening or -- or a
15 make out.

16 And, like, for example, I had my grandmother's
17 wedding ring and I had put it -- I had taken it off for
18 whatever reason and put it in my jewelry container and then it
19 went missing, and I was going bananas looking for my
20 grandmother's wedding ring.

21 And I was driving somewhere like a week later with
22 Mia and I saw the ring on her finger. And I was like: Where
23 did you get that?

24 And she's like: Oh, I needed it for a video where
25 we were pretending to be married, and I just really liked it

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1255

1 so I decided to keep it.

2 MR. ROBOTTI: Objection, relevance.

3 THE COURT: Overruled.

4 A Everything was communal.

5 Q And when you refer to "Maya," are you referring to Maya
6 Gilbert?

7 A Yes.

8 Q Were you ever alone while you were living at 1080?

9 A I was alone when I would take the subway to work. And
10 then there was this one time that I had a true back injury,
11 but I definitely exaggerated it because I -- I needed some
12 alone time.

13 Q While living at 1080, what time did you typically wake
14 up?

15 A Probably around 5 o'clock.

16 Q 5:00 a.m.?

17 A Yes.

18 Q And what was your schedule like for the day?

19 A It depended on the season. And the general routine would
20 be wake up, do fear inventory, journal and then go to morning
21 practice which was at 7:00. Maybe do some yoga.

22 And then if I was going to my formal clock in/clock
23 out job, I would go there and come back. Or if I wasn't
24 working that day for my formal job, I would go do lead
25 generation or, you know, hang out with my friends.

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1 And then come back for dinner because there was
2 usually a communal dinner and then hang out with Aubrey in the
3 evening usually.

4 Q You mentioned morning practice. What is that?

5 A Where we would get together. People would come down from
6 their rooms at 1080. Some people would come in from their
7 private homes if they were living off site and practicing and
8 we would have group OM.

9 Q How frequently did you OM while living at 1080?

10 A Again, it depends on the season. And if I had to average
11 it I would say about five times a day.

12 Q Did anyone direct you to OM that frequently?

13 A Yeah, I remember Justine Dawson telling me that she --

14 MR. ROBOTTI: Objection, hearsay.

15 MS. BONJEAN: Join.

16 BY MS. GUPTA:

17 Q Without getting into the content of any of your
18 discussions, who directed you to OM --

19 THE COURT: I'm going to sustain -- I'm going to
20 sustain the objection.

21 Ask the next question.

22 BY MS. GUPTA:

23 Q Without getting into the content of your discussions, who
24 if anyone, directed you to OM that frequently?

25 MR. ROBOTTI: Objection.

Gill - Direct - Gupta

1257

1 MS. COHEN: Objection, still hearsay.

2 BY MS. GUPTA:

3 Q You mentioned that someone directed you to OM five times
4 a day?

5 A Uh-huh.

6 THE COURT REPORTER: Is that a yes?

7 MR. ROBOTTI: Objection, hearsay.

8 THE COURT: Sustained.

9 Move on to the next question.

10 BY MS. GUPTA:

11 Q So you mentioned that at times you had jobs outside of
12 OneTaste and you also performed work for OneTaste.

13 Approximately how many days a week did you perform
14 work for OneTaste?

15 A In my mind it felt like every day because my life was
16 OneTaste.

17 Q Approximately how many hours per day did you work for
18 OneTaste?

19 A Again, it depends on the season, but anywhere from two to
20 eight.

21 Q You said you felt like your life was OneTaste. Why?

22 A I was slowly getting more and more involved. I had had
23 so much around my sexual identity that wasn't accepted in my
24 young life, so once I got to OneTaste and my sexuality was
25 celebrated, it was like a breath of fresh air and I was like

Gill - Direct - Gupta

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1 I'm seen as a sexual person and not just seen but celebrated
2 for it. So I really got engaged as deeply as I could.

3 Q Did you remain in contact with people at OneTaste
4 throughout the day?

5 A Yes.

6 Q How?

7 A We -- by text mostly. There was an understanding that
8 you had about 20 minutes to respond to a text because 15
9 minutes was an OM.

10 MS. BONJEAN: Objection to the foundation, basis.

11 THE COURT: One moment, please.

12 MR. ROBOTTI: Join.

13 THE COURT: Sustained.

14 MS. GUPTA: Sorry, Your Honor --

15 THE COURT: Objection's sustained.

16 MS. GUPTA: -- was it just that last part?

17 THE COURT: I'm sustaining the objection I believe
18 to the question and to the answer.

19 MS. GUPTA: Understood.

20 THE COURT: I understood that to be the objection;
21 correct?

22 MS. BONJEAN: Yes, Your Honor.

23 MR. ROBOTTI: Yes, Your Honor.

24 THE COURT: Go ahead.

25 BY MS. GUPTA:

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1259

1 Q Did your relationship with people outside of OneTaste
2 change once you were involved with OneTaste?

3 A Very much so.

4 Q How?

5 A It started off, like, people who, in my life, like my
6 parents and close friends would voice concern for my
7 involvement in OneTaste and eventually because spending any
8 time outside of OneTaste would negate or deplete the orgasm
9 that I had cultivated.

10 I ended up cutting ties with most family and friends
11 because they were not supportive of it and it really created a
12 silo for me.

13 Q Did you socialize at all while at OneTaste?

14 A Of course.

15 Q With who?

16 A People from OneTaste. Occasionally, I would go on, like,
17 a trip to go see my family because they desperately wanted to
18 stay connected with me.

19 But for the most part, it was socializing with
20 OneTaste people, Aubrey, Maddie and Michelle were probably my
21 best friends.

22 Q And what types of outings would you go on?

23 A We'd go to tea at Samovar Tea House. We'd go to dinner.
24 We'd go to Dolores Park and do lead generation.

25 Q Did you post on social media while you were at OneTaste

Gill - Direct - Gupta

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1 of some of your social outings?

2 A Of course.

3 Q What social media?

4 A Facebook and eventually Twitter.

5 Q And why did you post on Facebook and Twitter?

6 A Because everybody does. And with Twitter, Rachel
7 Cherwitz told me to create an account because I was doing
8 sales and I hated posing on Twitter, but I had to force myself
9 to.

10 Q While you were living at 1080, did you sign up for any
11 additional OneTaste courses?

12 A Yes.

13 Q What courses?

14 A I cannot recall all of them. I know I went through their
15 various OM -- leveled OM courses. I signed up for a third --
16 the third coaching program, as well. And -- and then, I was
17 also in the Valentine's Day course towards the end of my time
18 with OneTaste.

19 Q Approximately how much did each of these courses cost, to
20 the best of your recollection?

21 A The OM courses, to my recollection, were around 150 each
22 and I -- if I am remembering correctly, there were four of
23 them.

24 The third coaching program was cheaper than the
25 first one. It was 10,000 and I cannot remember how much the

Gill - Direct - Gupta

1261

1 Valentine's Day course is. I didn't pay for it.

2 Q Who paid for it?

3 A My boyfriend at the time, Amjad.

4 Q Approximately how much, in total, did you spend on
5 OneTaste courses?

6 A Maybe 30,000.

7 Q Why did you sign up for more and more OneTaste courses?

8 A In part because I was excited about the stuff that I was
9 learning and it was also expected to keep growing and learning
10 because that's how you cultivated more orgasm and stepped into
11 your power.

12 Q Who, if anyone, taught you that?

13 A Aubrey, Rachel, Mia, Rachael.

14 Q You mentioned two Rachels (sic), are you referring to
15 Rachel Cherwitz and Rachael Hemsli?

16 A I am.

17 Q Did signing up for these courses affect your financial
18 state?

19 A It did.

20 Q How?

21 A I -- I didn't have the job at Lilia Bell's for all that
22 long in my memory. I -- I didn't work there the whole time I
23 was OneTaste. And so I ended up doing a lot more sex work
24 because it was more flexible and I could make a lot more money
25 in a shorter period to be able to pay for my course work.

Gill - Direct - Gupta

1262

1 Q Were you in debt to OneTaste?

2 A I was.

3 Q In addition to the sex work that you mentioned, what are
4 some of the ways that you ended up raising money to pay your
5 debt to OneTaste?

6 A I married an undocumented immigrant for their Green Card
7 and he paid me \$10,000. I -- and then, I did some work trade,
8 as well.

9 Q You mentioned marrying someone. Can you describe how
10 that happened?

11 A Yeah. I was working at SoMa Inn Cafe which is right
12 underneath 10 -- it's in the same building as 1080 and it's a
13 restaurant and most of the employees there -- I'm pretty sure
14 I was the only documented citizen working there. The other
15 employees were under-the-table, undocumented employees.

16 And one of my coworkers said that her boyfriend was
17 needing his Green Card and would I be willing to consider
18 marrying him because he had money to pay. And initially, I
19 was like, no, I'm good. And then after thinking about it and
20 talking to some folks, I ended up deciding to do it.

21 Q And did you, in fact, get married?

22 A I did.

23 Q Did people at OneTaste know about this?

24 A They did.

25 Q Who knew?

Gill - Direct - Gupta

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1 A Well, I feel like everyone knew.

2 MR. ROBOTTI: Objection.

3 THE COURT: Sustained.

4 BY MS. GUPTA:

5 Q How much were you paid for the marriage?

6 A \$10,000.

7 Q Where did that money go?

8 A Directly to OneTaste.

9 Q Did anyone at OneTaste know that you used those funds to
10 pay for OneTaste courses?

11 A Yes.

12 MS. BONJEAN: Objection to foundation and state of
13 mind.

14 THE COURT: Sustained.

15 Ask your next question.

16 BY MS. GUPTA:

17 Q Did you tell anyone at OneTaste that you were using this
18 money to pay for OneTaste courses?

19 A Yes.

20 Q Who did you tell?

21 MS. BONJEAN: Objection, hearsay.

22 THE COURT: Overruled.

23 Q You can answer.

24 A Aubrey Fuller, Rob Kandell, Justine Dawson, Rachael
25 Hems, Maddie Carl, Michelle Wright, Rachel Cherwitz.

Gill - Direct - Gupta

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1 Q And you also mentioned that you had engaged in sex work
2 to pay for OneTaste courses.

3 Did you tell anyone other than Aubrey Fuller that
4 you were using sex work to pay for OneTaste courses?

5 A Yes, I was not shy about it.

6 Q Who did you tell?

7 A I told Rachael Hemsli because we had a conversation about
8 it in the kitchen. I told Justine Dawson. I told Rachel
9 Cherwitz. I told Rob Kandell. I told Ken Blackman.

10 Q I want to turn now to discuss some of the OneTaste
11 courses that you took.

12 Were Nicole Daedone and Rachel Cherwitz involved in
13 teaching OneTaste courses?

14 A Yes.

15 Q Can you generally describe OneTaste teachings regarding
16 the classes of OM in the four courses that you mentioned?

17 A Like, describe OM?

18 Q Describe what the courses taught about OM.

19 MS. BONJEAN: Objection, vague.

20 THE COURT: Sustained.

21 BY MS. GUPTA:

22 Q In OneTaste courses and lectures that you attended, did
23 Nicole Daedone ever discuss enlightenment?

24 A Yes.

25 Q What, if anything, did she teach about enlightenment?

Gill - Direct - Gupta

1265

1 A Enlightenment was brought about by pushing past any
2 barriers that you have around sex and sexuality, you know,
3 "turn a no into a yes," or, you know, if there's someone that
4 you're repulsed by push through it because that repulsion is
5 keeping you from being free.

6 Q What did you understand "turn a no into a yes" to mean?

7 MS. BONJEAN: Objection.

8 THE COURT: Overruled.

9 A In hindsight it was like --

10 MS. BONJEAN: Objection to the "hindsight."

11 THE COURT: Sustained.

12 BY MS. GUPTA:

13 Q At the time, what did you understand "turn a no into a
14 yes" to mean?

15 A To push through your repulsion. To push -- and say yes
16 to things that you may not want to do so that you can be
17 freed.

18 Q Did Nicole Daedone ever describe any myths to you?

19 A Yes. There was a myth of some sacred prostitutes that
20 lived off of the isle -- off of an island in Greece, if I'm
21 remembering the location correctly, who would -- apologize for
22 my language -- "fuck the war out of men."

23 Q What did that mean to you?

24 A It was an analogy for the ways in which we could -- we,
25 as women, could alchemize and change the anger of men in sex

Gill - Direct - Gupta

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1 into something positive. Like the women were the catalyst for
2 that change.

3 Q Did Nicole Daedone ever say how that myth connected to
4 OneTaste?

5 A It was -- it was one of the roles that -- and tasks that
6 was given to me. Certainly, I don't recall how -- outside of
7 that, how it was connected to OneTaste.

8 Q What do you mean it was the task that was given to you?

9 A I was given the task to fuck the war out of men.

10 Q Who gave you that task?

11 A Nicole.

12 Q Did Nicole Daedone ever use the term sexual alchemy?

13 A Yes.

14 Q What did she say?

15 A Similar concept. It was taking all of -- like, if you --
16 there's a -- like you couldn't get raped because you would
17 take that anger from whoever the rapist was and get so turned
18 on that you could turn it into something loving and positive,
19 which I thought was bananas that women can't get raped.

20 Q Did you agree with that concept?

21 A Absolutely not.

22 Q Had you ever been a victim of sexual assault?

23 A I have.

24 Q Did you share that with anyone at OneTaste?

25 A Yes.

Gill - Direct - Gupta

1267

1 Q Who?

2 A The -- the core staff at 1080. I wanted to -- initially,
3 in my coaching program, I wanted to use everything that I was
4 learning to help counsel survivors of rape victims and rapists
5 themselves because I had previous experience in my undergrad
6 doing that sort of thing and I remember being laughed at.

7 Q Did these teachings affect your sexual boundaries?

8 A They did, yes.

9 Q In what way?

10 A It taught me that all of the things that I was feeling,
11 all of the red flags and the warnings that my internal
12 dialogue was giving me were not valid and that I needed to
13 dismiss them so that I could become an empowered woman.

14 Q Was there a particular language that people used at
15 OneTaste that was specific to OneTaste?

16 MS. BONJEAN: Objection, vague.

17 THE COURT: Sustained.

18 BY MS. GUPTA:

19 Q Are you familiar with the term "the fourth dimension"?

20 A Yes.

21 Q How, if at all, was that phrase used at OneTaste?

22 A It was used to talk about the abstract nature and
23 language that made it really confusing to follow for me. I am
24 not an abstract thinker or an abstract talker. I'm very
25 concrete.

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1 Q Are you familiar with the term "Muggle" as used at
2 OneTaste?

3 A Yes.

4 Q What did it mean?

5 A It was someone who was an everyday person who didn't
6 understand the magic of alchemy, in quotes.

7 Q Are you familiar with the phrase "aversion practice" as
8 it was used at OneTaste?

9 A Yes.

10 Q What did you understand aversion practice to mean?

11 A Anyone that you had an aversion to, usually a man, that
12 you had to push through your aversion to it so that you could
13 once again step into your power.

14 Q Did you ever hear the phrase "golden pussy" used?

15 A Yes.

16 Q And how was that phrase used at OneTaste?

17 A It was for women who had boundaries and didn't want to
18 put out.

19 Q Who, if anyone, used that phrase?

20 A Nicole.

21 Q Are you familiar with the terms "the masculine" and "the
22 feminine" as they were used at OneTaste?

23 A Yes.

24 Q What, if anything, did Nicole Daedone teach about the
25 masculine and the feminine?

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1 A The masculine was the structures that you could -- and --
2 and the boundaries that would hold the feminine; and the
3 feminine was the chaos, the sex, the deviance that you can
4 play around in the container of the masculine.

5 Q Are you familiar with the terms upstroke and downstroke?

6 A Yes.

7 Q What did those terms mean at OneTaste?

8 A They had two different connotations. In terms of OM, the
9 physical upstroke was when you were stroking the clitoris in
10 an upward manner and it would get you turned on and excited
11 and kind of brighten your body or the room.

12 Downstroke were physical downward direction strokes
13 that were, pardon me, very firm in pressure and it would
14 ground your body, kind of like a tight hug.

15 In terms of more abstract jargon, it was -- an
16 upstroke was a comment that you could give someone where --
17 where it would make them happy. It would make them bright and
18 shiny, kind of like a compliment.

19 And a downstroke would kind of bring them down to
20 earth. It -- it could be done kindly or unkindly.

21 Q Are you familiar with the term tumesce?

22 A Yes.

23 Q What did it mean to be tumesce at OneTaste?

24 A It usually meant that you were full of orgasm or full of
25 energy and you had too much energy in your body so you were

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1 getting kind of cranky, so you would need to -- what they
2 called -- go over, or have an orgasm.

3 Q Did OneTaste leaders, including Nicole Daedone and Rachel
4 Cherwitz, ever discuss the concept of consent with you?

5 A Not overtly in my memory.

6 Q Did OneTaste leaders, including Nicole Daedone and Rachel
7 Cherwitz, use the phrasing "VIPs"?

8 A Yes.

9 Q Who were VIPs?

10 A Usually high-paying clients.

11 Q Did OneTaste leaders, again, including Nicole Daedone and
12 Rachel Cherwitz, use the term "marks"?

13 A Yes.

14 Q What were marks?

15 A Similar to high-paying clients, they were people that we
16 were trying to get in courses.

17 Q Now, you mentioned earlier that you performed work at
18 OneTaste to pay off your debt to OneTaste.

19 What kinds of tasks did you perform at a high level?

20 A Back-of-house courses. I did some outreach and lead
21 generation and then I was Reese's handler.

22 Q What is "lead generation"?

23 A It's where you would go and get people who would want to
24 sign up or courses or come to TurnON events.

25 MS. GUPTA: Can we show the witness only what's been

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1 marked as Government Exhibit 4520.

2 (Exhibit published to witness only.)

3 BY MS. GUPTA:

4 Q Do you recognize this?

5 A I do.

6 Q What is it?

7 A It's a text message between myself and Rachael Hemsí.

8 Q How do you recognize it?

9 A Because I took that screenshot.

10 MS. GUPTA: Mr. McNett, could we just flip through?

11 BY MS. GUPTA:

12 Q Did you provide more than one screenshot?

13 A Oh, yes.

14 Q Is this a fair and accurate depiction of text messages
15 that you exchanged with Rachael Hemsí?

16 A It is.

17 MS. GUPTA: Your Honor, we move to admit Government
18 Exhibit 4520.

19 MR. ROBOTTI: Objection, hearsay.

20 MS. BONJEAN: Objection, hearsay and relevance to --

21 THE COURT: Sustained.

22 MS. GUPTA: Your Honor, we would admit these subject
23 to connection or as an agency statement given the prior
24 testimony regarding Rachael Hemsí's role at OneTaste under
25 801(d)(2).

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1 MS. BONJEAN: Objection to the agency foundation, as
2 well.

3 THE COURT: One moment, please.

4 (Pause in proceedings.)

5 THE COURT: Give me the rule provisions exactly that
6 you are offering this under.

7 MS. GUPTA: 801(d)(2)(E), I believe.

8 (Pause in proceedings.)

9 THE COURT: And you're offering that subject to
10 connection?

11 MS. GUPTA: Correct, Your Honor. Alternatively, I
12 do believe it would be admissible under 802.

13 THE COURT: Let me look at what you're seeking at
14 this time to put in. How long is it exactly? Where does it
15 start and where does it end?

16 MS. GUPTA: If I could have a moment, Your Honor.

17 THE COURT: Yes. You could hand me up the exhibit
18 that you're trying to admit.

19 MS. GUPTA: Yes, Your Honor. May I approach?

20 THE COURT: Yes.

21 (Counsel approaches.)

22 THE COURT: And you're seeking to offer this entire
23 document?

24 MS. GUPTA: Yes, Your Honor.

25 THE COURT: How much more do you have with this

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1 witness?

2 MS. GUPTA: Quite a bit more.

3 THE COURT: This is not what was provided yesterday,
4 is that correct in terms of a motion?

5 MS. GUPTA: No, Your Honor, this was not the subject
6 of the motion.

7 THE COURT: So why don't you come back to this. I'm
8 going to sustain the objection for now. You can return to
9 this later and I will hear you on a break, but I don't want to
10 keep the jury waiting. Move on to your next topic.

11 MS. GUPTA: Understood, Your Honor.

12 BY MS. GUPTA:

13 Q Now, Ms. Gill, earlier you mentioned some of the titles
14 that you had when you were at OneTaste including Mother's
15 Teresa of Orgasm and TurnON Fairy, TurnON Bunny, Fluffer and
16 Sacrad Prostitute.

17 Who, if anyone, gave you these names?

18 A The TurnON Bunny, TurnON Fairy to my recollection was --
19 it was used by a lot of the core staff but mostly Rachel
20 Cherwitz.

21 The Mother Teresa of Orgasm, it was a -- it was a --
22 what's the word I'm looking for? An activity in the coaching
23 program where we had to -- I don't remember why I was giving
24 myself that name, but I -- I didn't give it to myself, it was
25 in a group discussion and that came up. I think Keith

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1 Paolino, you know, kind of suggested it. And I was like, oh,
2 that seems really applicable, you know, because it's nurturing
3 and loving and generous and giving and that's kind of what
4 we're doing here is being generous with our sex.

5 And Nicole Daedone came up to me and said I wouldn't
6 normally say yes to something like that, but for you I think
7 it's applicable.

8 And then what was the other one?

9 Q I believe you also mentioned Fluffer, TurnON Fairy and
10 Sacred Prostitute?

11 A Thank you.

12 Sacred Prostitute was Nicole and Fluffer was Rob
13 Kandell, and TurnON Fairy was also Cherwitz.

14 Q While at OneTaste did anyone expect you to OM with
15 prospective clients?

16 A Yes.

17 Q Who told you to do that?

18 A Mostly it was people who were head of sales so it varied
19 at the time.

20 MS. BONJEAN: Objection to foundation.

21 THE COURT: Overruled.

22 BY MS. GUPTA:

23 Q And you testified earlier that Rachel Cherwitz was head
24 of sales; correct?

25 MR. ROBOTTI: Objection, leading.

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1 THE COURT: Sustained.

2 BY MS. GUPTA:

3 Q Who was head of sales during your time at OneTaste?

4 A I think Alisha was -- Alisha Price was head of sales, but
5 I could be wrong about that, and Rachel Cherwitz took over
6 head of sales eventually.

7

8 (Continued on the following page.)

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1 (Continuing...)

2 BY MS. GUPTA:

3 Q And did you, in fact, OM with the prospective clients?

4 A Yes.

5 Q Did Nicole Daedone or Rachel Cherwitz ever direct you to
6 stroke men associated with OneTaste?

7 A Yes.

8 Q What did it mean to stroke a man?

9 A Give a handjob.

10 Q Was there another term for that at OneTaste?

11 A A male OM.

12 MS. GUPTA: I'd like to now show the witness only
13 what's been marked as Government Exhibit 4518.

14 Q Do you recognize this?

15 A I do.

16 Q What is it?

17 A Text messages between myself and Rachel Cherwitz.

18 Q How do you recognize them?

19 A They're my text messages.

20 MS. GUPTA: Your Honor, we would move to admit
21 Government 4518.

22 THE COURT: Okay. Now I'm going to need the full
23 copy of what it is you are seeking to admit.

24 MS. GUPTA: Yes, Your Honor. I believe it is in
25 your binder, and I can also pass up a copy.

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1 THE COURT: Give me a minute. You don't need to
2 give me another copy if you have already given it to me. It's
3 4518?

4 MS. GUPTA: Yes.

5 THE COURT: Okay. I have it. I don't need another
6 copy then.

7 Go ahead.

8 MS. GUPTA: Your Honor, we move to admit Government
9 Exhibit 4518.

10 MR. ROBOTTI: Objection for the reasons previously
11 stated.

12 THE COURT: Ms. Bonjean, any objection?

13 MS. BONJEAN: I join in the objection of
14 Mr. Robotti.

15 THE COURT: Without any further foundation, I
16 sustain the objection.

17 BY MS. GUPTA:

18 Q You mentioned that Rachel Cherwitz directed you to stroke
19 men associated with OneTaste?

20 A Yes.

21 Q Did she ever direct you to stroke men associated with
22 OneTaste via text message?

23 A Yes.

24 MS. GUPTA: Your Honor, we again move to admit
25 Government Exhibit 4518.

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1 MR. ROBOTTI: Same objections.

2 MS. BONJEAN: Same.

3 THE COURT: On that foundation, sustained.

4 Ask your next question.

5 MS. GUPTA: Your Honor, may I have a moment, please.

6 THE COURT: You may.

7 (Short pause.)

8 BY MS. GUPTA:

9 Q Ms. Gill, looking at Government Exhibit 4518, does this
10 reflect a conversation that you and Rachel Cherwitz had?

11 A Yes.

12 Q And is this a fair and accurate depiction of a
13 conversation that you had with Rachel Cherwitz?

14 A Yes.

15 Q And as part of these conversations -- or does this
16 include directions that Rachel Cherwitz gave you as to
17 stroking men associated with OneTaste?

18 MR. ROBOTTI: Objection.

19 THE COURT: What's the basis?

20 MR. ROBOTTI: Not in evidence.

21 MS. BONJEAN: And leading.

22 MR. ROBOTTI: And leading.

23 THE COURT: Sustained as to leading.

24 BY MS. GUPTA:

25 Q Does this text message exchange include directions from

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1 Rachel Cherwitz?

2 A Yes.

3 MS. GUPTA: Your Honor, we would move to admit
4 Government Exhibit 4518.

5 MR. ROBOTTI: Same objections.

6 MS. BONJEAN: Same objections.

7 THE COURT: To the extent that you are offering the
8 entire exhibit, the objection is sustained.

9 BY MS. GUPTA:

10 Q Ms. Gill, does this exhibit also include references to
11 work you performed at OneTaste? And feel free to take a look.

12 A Yes.

13 MS. GUPTA: Your Honor, we would move to admit
14 Government Exhibit 4518.

15 MR. ROBOTTI: Objection.

16 MS. BONJEAN: Join.

17 THE COURT: To the extent that you are seeking to
18 offer the entire exhibit, the objection is sustained.

19 We are probably going to take a break in ten minutes
20 or so, if you want to move on to something else.

21 MS. GUPTA: Yes, Your Honor. I'll do that.

22 THE COURT: Okay.

23 MS. GUPTA: I'd like to show the witness what's been
24 marked as Government Exhibit 339.

25 BY MS. GUPTA:

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1 Q Do you recognize this individual?

2 A Yes. That's Antonios.

3 Q Is this a fair and accurate depiction of Antonios?

4 A Yes.

5 Q What, if any, role did Antonios have with respect to
6 OneTaste?

7 A He was in the coaching -- the third coaching program with
8 me.

9 MS. GUPTA: Your Honor, we move to admit Government
10 Exhibit 339.

11 THE COURT: Any objection?

12 MR. ROBOTTI: No objection.

13 MS. BONJEAN: No objection.

14 THE COURT: Government Exhibit 339 is admitted.

15 (Government Exhibit 339 received in evidence.)

16 BY MS. GUPTA:

17 Q While you were at OneTaste, did you ever receive any
18 instructions with respect to Antonios?

19 A Yes.

20 Q What was the instruction?

21 A He was getting ready to withdraw from the coaching
22 program, and I was told to go make sure that he stayed in the
23 coaching program.

24 Q What did you understand that instruction to mean?

25 A To make out with him, which was all inclusive of a wide

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1 variety of sexual acts.

2 Q Who gave you that instruction?

3 A The head of sales.

4 Q What was your understanding of why you received that
5 instruction?

6 A Because he was getting ready to leave, and he was a high
7 paying client.

8 Q Was he considered a VIP?

9 A I don't recall.

10 Q What, if anything, did you do with Antonios?

11 A I performed fellatio and gave him a handjob.

12 Q Did you later report what had happened to anyone at
13 OneTaste?

14 A I did.

15 Q Did you report this to?

16 A The head of sales.

17 Q Why did you engage in these sex acts with Antonios?

18 A Because I was told to.

19 Q And you said you were told to by the head of sales. Who
20 was that?

21 A I believe it was Rachel Cherwitz.

22 Q Were there any other instances where you were directed to
23 OM or engage in sexual activity with VIPs or other high paying
24 clients?

25 A Yes.

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1 Q What are some examples?

2 A During the Valentine's Day course there was this young
3 couple. I think they were from Australia. And Kate, the
4 young woman, was very nervous. Her husband was very into
5 everything that was happening, and she seemed to take a liking
6 to me. So I was told to OM with her. So I ended up stroking
7 her so that she would be a little bit more at ease and have a
8 friendly face in the room.

9 Q You said someone told you to OM with her. Who was that
10 person?

11 A Rachel Cherwitz.

12 MS. GUPTA: If we can show the witness only what's
13 been marked as Government Exhibit 267.

14 Q Do you recognize this?

15 A I do.

16 Q Who is it?

17 A Mark Gottlieb.

18 Q And what role, if any, did he have with respect to
19 OneTaste?

20 A He lived on the second floor.

21 Q At 1080?

22 A Yes. Sorry. At 1080.

23 Q Is this a fair and accurate depiction of him?

24 A Yes.

25 MS. GUPTA: Your Honor, we move to admit Government

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1 Exhibit 267.

2 THE COURT: Any objection?

3 MR. ROBOTTI: No objection.

4 MS. BONJEAN: No objection.

5 THE COURT: Government Exhibit 267 is admitted.

6 (Government Exhibit 267 received in evidence.)

7 BY MS. GUPTA:

8 Q Did anyone while you were at OneTaste direct you to
9 engage in any sexual activity with Mark?

10 A I was told to OM with him.

11 Q Who told you to OM with him?

12 A I don't recall.

13 Q Why did you? Or, I'm sorry.

14 Did you, in fact, OM with him?

15 A Yes.

16 Q Why did you?

17 A Because it was asked of me, and it was considered to be
18 liberative and freeing because I wouldn't have OM'd with him
19 otherwise.

20 Q Why would you not have OM'd with him otherwise?

21 A Because he's old.

22 MS. BONJEAN: Objection. Relevance.

23 THE COURT: Overruled.

24 Q You can respond.

25 A Because he's old and I was not attracted to him. I

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1 wouldn't have OM'd with someone like that normally.

2 Q What is your understanding of why you were directed to OM
3 with him?

4 MS. BONJEAN: Objection. Foundation.

5 THE COURT: Sustained.

6 Q Do you know why you were asked to OM with him?

7 A I believe it was because he was a high paying client.

8 MS. GUPTA: Could we go to Government Exhibit 204,
9 which I believe is -- or, I'm sorry, 205, which I believe is
10 in evidence.

11 THE COURT: Yes, it is.

12 Q Ms. Gill, who's pictured here?

13 A That's Alisha Price.

14 Q Did anyone at any time while you were at OneTaste direct
15 you to engage in any sexual activity that involved Alisha
16 Price?

17 A I OM'd with her at least once that I remember, and then I
18 was working back of house for a course, and I was asked to get
19 up on a massage table and hold a dildo to my pelvis while she
20 performed fellatio on it.

21 Q And what was this in the context of?

22 A In a course.

23 Q What course, if you recall?

24 A I couldn't tell you.

25 Q Do you recall who asked you to do this?

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1 A I don't.

2 Q Were there students in attendance at that particular
3 course?

4 A Yes, there were.

5 Q Approximately how many students were in attendance?

6 A It was a small room, so a small handful. I have no
7 memory of how many were in there.

8 MS. GUPTA: Can we put up Government Exhibit 221.

9 Q I believe you identified this photo earlier. Can you
10 just remind the jury who is pictured here?

11 A Rob Kandell.

12 Q Did anyone at any time while you were at OneTaste direct
13 you to engage in any sexual activity with Rob Kandell?

14 A Yes.

15 Q Who directed you to engage in sexual activity with him?

16 A Yia Vang.

17 Q What did she direct you to do?

18 A As my first task of being trained to be a sacred
19 prostitute, she told me to put on a T-shirt that she had
20 borrowed for him, and go to his room wearing just the T-shirt,
21 to return it to him.

22 Q And did you do that?

23 A I did.

24 Q Afterwards, did you report back to anyone?

25 A I reported back to Yia. He wasn't in the room.

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1 Q Are you familiar with any sexually explicit films
2 commissioned by OneTaste?

3 A I am -- I have -- I heard about them. I -- oh, and I was
4 in one. Yes. Yes.

5 Q How are you familiar with them?

6 A I was asked to be the person for an OM video. I have no
7 idea what happened to it, but I do know that my labia were
8 recorded for a very long time.

9 Q Who asked you to participate in this film?

10 A I don't fully recall. I know Rob Kandell stroked me. So
11 in my memory, it was him.

12 Q Did you want to participate in this video?

13 A I was willing to because someone asked me to.

14 Q Were you paid to appear in the video?

15 A Not to my memory.

16 Q And do you know what became of the video?

17 A No idea.

18 Q At the time you performed all of the sexual services that
19 we just discussed, did you have any savings?

20 A No.

21 Q Did you have a place where you could live outside of
22 1080?

23 A No.

24 Q Did you have any support network outside of OneTaste?

25 A No. I had alienated myself from my family and my friends

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1 at that point.

2 Q And at a high level, how, if at all, did your performance
3 of these sexual acts affect your emotional state?

4 A It reinforced the idea that I had no value outside of my
5 sex.

6 Q And how, if at all, did your performance of these sexual
7 acts affect your psychological state?

8 MS. BONJEAN: Objection to that.

9 THE COURT: Overruled.

10 A It undermined my ability to trust myself, and it made me
11 wholly dependent on the OneTaste community. I felt like I
12 would lose everything, my life, my -- the only relationships
13 that I had left, and my connection to God, even.

14 THE COURT: Is now a convenient time, Ms. Gupta, to
15 take a break, or do you have another question or two that
16 would be useful to do now and then take a break?

17 MS. GUPTA: Your Honor, I have maybe three more
18 questions.

19 THE COURT: Okay. Then why don't you do that.

20 MS. GUPTA: Thank you.

21 BY MS. GUPTA:

22 Q You mentioned your connection to God. Why do you say
23 that?

24 A Well, I got very involved in church at the end of my
25 tenure. I am currently clergy, an ordained elder, and I

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1 remember journaling about wondering if I would have access to
2 God without OneTaste because OneTaste had reconnected me to my
3 faith.

4 Q Despite all of the impact that you just described on your
5 emotional and psychological state, did you stay at OneTaste
6 and continue to perform labor and services for the company?

7 A I did.

8 Q Why?

9 A Because that was my entire support network at that point,
10 and I had desperately wanted to feel seen for those parts of
11 me that had been neglected as a young person. I just didn't
12 feel like I had any other options available to me.

13 MS. GUPTA: Your Honor, now would be a good time for
14 a break.

15 THE COURT: Okay. The witness may step down.

16 (Short pause; witness exits courtroom.)

17 THE COURT: We will take a break until 11:20. Enjoy
18 your break, and don't talk about the case.

19 I will see you at 11:20.

20 (Jury exits the courtroom.)

21 THE COURT: Everyone may be seated.

22 I want to raise one issue with the parties, and it
23 relates to text messages.

24 Proper foundation has to be laid before any text
25 message is going to be admitted into evidence. You have given

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1 me a lot of text messages. You have given me lengthy
2 messages. In some cases it's not clear whether they're
3 consecutive. It is not clear what the dates are on some of
4 them. So I leave you with that.

5 MS. BENSING: Your Honor, may I ask one follow-up
6 question?

7 THE COURT: Yes.

8 MS. BENSING: If the government is able to establish
9 the entirety of the date range that this represents the text
10 message between her and the defendant between X date range, I
11 just want to understand if that is sufficient for the Court in
12 terms of that objection. Because I think that there may have
13 also been like a relevance objection or something like that.
14 But --

15 THE COURT: Even just the foundation and
16 authenticity has to be established before anything is coming
17 into evidence.

18 MS. BENSING: Understood. Okay. I just wanted to
19 make sure --

20 THE COURT: What you have given me, some things are
21 cut off. So, I mean, you all know how to get evidence in.
22 You have to lay the right foundation for it. But I think
23 perhaps it's better to lay the foundation before you seek to
24 offer it rather than after the fact.

25 MS. BENSING: Yes, Your Honor.

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1 THE COURT: And if there's any other exhibits that
2 are lengthy text chains that you want me to look at
3 specifically, I know you filed a motion last night, which, you
4 know, obviously, I looked at all of that. This is different.
5 I mean, you have given me binders and binders of exhibits. So
6 if there's something you think is going to be coming up, let
7 me know because I am not going to waste the jury's time while
8 I flip through dozens and dozens of pages of text messages.

9 MS. BENSING: So, Your Honor, if we can give the
10 Court a heads up, I think we'll be presenting Government
11 Exhibits 4518, 4519, and 4520.

12 THE COURT: Okay. 4518?

13 MS. BENSING: Yes.

14 THE COURT: 45 -- sorry, what's the next one?

15 MS. BENSING: 4519.

16 THE COURT: And 4520 is the one that was attempted
17 to be offered --

18 MS. BENSING: Correct.

19 THE COURT: -- already.

20 Okay. I mean, I will take a look at those, you take
21 a look at those, and if there's no proper foundation and it's
22 not relevant, et cetera, of course it is not coming in. But I
23 didn't want to have an extended conversation about this in
24 front of the jury. But I will tell you, based on what you are
25 giving me here, there needs to be more foundation. And that's

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1 for anybody and everybody who is going to try to admit text
2 messages. Okay.

3 MS. GUPTA: Your Honor, if I could just clarify one
4 thing.

5 THE COURT: Yes.

6 MS. GUPTA: You mentioned some of them look cut off.
7 And that's because the witness took screenshots.

8 THE COURT: Okay. But you're going to have to lay
9 whatever foundation you have to lay, but I'm not filling in
10 the blanks.

11 MS. GUPTA: I just wanted to let you that in those
12 instances where it appears to be cut off, generally the next
13 page covers the part that was cut off. I just wanted to make
14 that clear.

15 THE COURT: You know, I've seen that. But you're
16 going to have to lay the right foundation if you want to try
17 to offer those.

18 MS. GUPTA: Understood.

19 THE COURT: See everyone at 20 after.

20 (Recess taken.)

21 (Proceedings continue in open court; no jury
22 present.)

23 THE COURTROOM DEPUTY: Remain seated.

24 THE COURT: Thank you.

25 MS. BENSING: Your Honor?

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1 THE COURT: Yes.

2 MS. BENSING: Can we raise one issue with the Court
3 briefly regarding those exhibits?

4 THE COURT: Yes. I have an issue to raise with the
5 parties on those exhibits first, though.

6 Some of those exhibits are not sequentially Bates
7 numbered. And to the extent that you're telling me that this
8 is sort of one document, it doesn't appear to be complete.
9 And there are a couple of instances where the numbers just
10 skip.

11 So I am not going to take more time now on that.
12 You are going to have to get that in order, but there are gaps
13 in the Bates numbering.

14 Anyway, what did you want to raise?

15 MS. BENSING: Your Honor, just that we are
16 shortening the time period, but let us take a look at the
17 originals of these. We may need to seek one that's not Bates
18 stamped so that we are making sure we are getting the
19 entirety. We will work on that right now.

20 THE COURT: Okay. So it is not just a one-off
21 mistake here. There are several instances where the Bates
22 numbers jump.

23 MS. BENSING: Understood, Your Honor.

24 THE COURT: And that's based on the binder that was
25 given to me. So if there's some other version floating

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1 around, that's not what I am going off of.

2 MS. BENSING: Understood, Your Honor.

3 THE COURT: Okay. Shall we bring the witness in and
4 bring in the jury.

5 (Witness retakes the stand.)

6 (Jury re-entered the courtroom.)

7 THE COURT: Okay. Everyone may be seated.

8 Ms. Gupta, you can continue.

9 MS. GUPTA: Can we pull up Government Exhibit 284,
10 please. I believe this is in evidence.

11 THE COURT: Yes.

12 MS. GUPTA: Thank you.

13 (Direct examination, cont'd)

14 BY MS. GUPTA:

15 Q Ms. Gill, do you recognize the person pictured here?

16 A I do.

17 Q Who is it?

18 A That's Reese Jones.

19 Q And could you remind the jury who is Reese Jones?

20 A He was Nicole Daedone's boyfriend. I don't know if he
21 still is.

22 Q During your time at OneTaste, what, if any, affiliation
23 did Reese Jones have with OneTaste?

24 A He was the financial backer for OneTaste. And then he
25 was Nicole's boyfriend.

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1 Q You mentioned earlier that there was a time where you
2 became Reese Jones' handler. What is "handler"?

3 A I took care of him, I would -- I was expected to bring
4 him breakfast and hang out with him, take him for walks, and
5 then sexually service him.

6 Q Who, if anyone, asked you to perform sexual acts for
7 Reese Jones?

8 A Yia Vang.

9 Q Before that happened, had anything of significance
10 happened to you on a personal level?

11 A Yes.

12 MS. BONJEAN: Objection.

13 THE COURT: Yes. Sustained.

14 Q When were you asked to perform sexual acts for Reese
15 Jones? When, approximately?

16 A Late 2012, maybe early 2013.

17 Q To your knowledge, were other women at OneTaste also
18 recruited to sexually service Reese Jones?

19 A Yes.

20 Q Who?

21 A Michelle Wright and Maddie Carl.

22 MS. GUPTA: We can pull up Government Exhibit 408,
23 which I believe is in evidence.

24 Q Who's pictured here?

25 A Michelle Wright.

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1 MS. GUPTA: And can we pull up Government Exhibit
2 261.

3 Oh, I apologize. For the witness only.

4 THE COURT: It is in evidence.

5 MS. GUPTA: Thank you.

6 BY MS. GUPTA:

7 Q And who is pictured here?

8 A Maddie Carl.

9 Q What relationship, if any, did she have with Reese Jones?

10 A She was Reese's handler right --

11 MS. BONJEAN: Objection.

12 MR. ROBOTTI: Objection.

13 THE COURT: Sorry. I believe there was an
14 objection.

15 MR. ROBOTTI: Foundation.

16 MS. BONJEAN: Join.

17 THE COURT: Okay. Sustained.

18 BY MS. GUPTA:

19 Q You mentioned earlier that other women were recruited to
20 sexually service Reese Jones, including Michelle and Maddie,
21 correct?

22 A Yes.

23 Q Do you have an understanding of who directed them to do
24 that?

25 A No.

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1 Q You mentioned that Yia Vang directed you to sexually
2 service Reese Jones?

3 A Yes.

4 Q What did she ask you to do?

5 MS. BONJEAN: Objection. Hearsay.

6 MR. ROBOTTI: Join.

7 MS. GUPTA: Your Honor, we believe this is an
8 exception under 801(d)(2).

9 THE COURT: Are you offering it subject to
10 connection?

11 MS. GUPTA: Yes. Or, alternatively, as an agency
12 statement.

13 THE COURT: It is admitted -- the objection is
14 overruled. She may testify, subject to connection.

15 A Can you repeat the question, please.

16 Q Yes.

17 What did Yia Vang direct you to do?

18 A I was in Reese's bedroom, and she opened the boudoir next
19 to his bed, and it was full of sex toys, and she told me to
20 practice my topping skills by using those toys.

21 Q What are topping skills?

22 A It's a BDSM term where you -- the top is the one who is
23 in control who's, for example, leading him around on a dog
24 leash or whipping him with cat tails.

25 Q To your knowledge, did Maddie Carl and Michelle Wright

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1 continue to sexually service Reese Jones while you were also
2 servicing him?

3 A I couldn't tell you.

4 MR. ROBOTTI: Objection. Foundation.

5 THE COURT: Overruled.

6 Q You can respond.

7 A Thank you.

8 I have some vague memories of them coming in while I
9 was his handler, specifically of Maddie coming in, but I don't
10 have any distinct memory of them coming in.

11 Q How did you end up becoming Reese Jones' handler?

12 A Maddie approached me one day and told me that she and
13 Michelle could no longer --

14 MR. ROBOTTI: Objection. Hearsay.

15 THE COURT: Response?

16 MS. GUPTA: Effect on the listener, Your Honor.

17 THE COURT: Overruled.

18 Q You can respond.

19 THE COURT: You may answer.

20 THE WITNESS: Thank you.

21 A She told me that she and Michelle could no longer
22 continue doing the work that they were being asked to do, and
23 asked if I would please take over.

24 Q And what did you say?

25 A I said yes. They were some of my best friends, and they

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1 looked like they were in pain.

2 Q How did you first meet Reese Jones?

3 A My first experience with him was in the back of a
4 classroom when he would come and support Nicole, and then when
5 it comes to my job as his handler, I met him through an
6 audition at a concert.

7 Q Can you describe the audition?

8 A I was texted by Yia to meet them, to go to this concert,
9 her and Nicole, and I met them downstairs. I was picked up in
10 a car. Rob Kandell was driving, and he turned around and
11 said, oh, you are sneaking in the back door again, huh.

12 And then they dropped me off at the venue for this
13 concert. And we listened to music, and I danced with Reese,
14 to see if he liked me. And I remember looking over at Nicole
15 and Yia, and they nodded in approval.

16 Q You mentioned Yia asked you to go to this concert?

17 A Uh-huh.

18 Q Did you view Yia Vang as an authority figure at OneTaste?

19 A Absolutely.

20 MS. BONJEAN: Objection to vagueness.

21 THE COURT: Overruled.

22 Q You can answer.

23 A Absolutely.

24 Q And who did Yia Vang report to, if anyone?

25 A Nicole.

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1 Q What happened after the audition?

2 A To my memory, I was then moved in to Reese's house, even
3 though I had to maintain residency at 1080 so that when Nicole
4 came to visit I could move out. And I -- that's when Yia
5 showed me the boudoir of sex toys and showed me what to do.

6 Q And why do you refer to this meeting with Reese as an
7 audition?

8 A Because that's what it felt like. It felt like it was
9 meant to see if he liked me.

10 Q And what did you understand to be the role that you were
11 auditioning for?

12 A To be his handler, to have sex with him.

13 Q You mentioned that Yia and Nicole were watching you when
14 you were dancing with Reese. How did you feel while that was
15 happening?

16 A Nervous. I knew that I wanted to be doing a good job so
17 that I could prove that I was worthy of re-entry into OneTaste
18 because I had just suffered a miscarriage.

19 Q When did you suffer that miscarriage?

20 A Earlier that year. In my memory, it was in August.

21 Q And when approximately was this audition with Reese
22 Jones?

23 A I think it was in December of 2012.

24 Q Was Nicole Daedone aware of your miscarriage --

25 MS. BONJEAN: Objection.

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1 Q -- to your knowledge?

2 MS. BONJEAN: Same objection.

3 THE COURT: Sustained.

4 Q Did you tell people at OneTaste about your miscarriage?

5 A Yes.

6 Q Who did you tell?

7 A I told anyone that would listen. And then I was directed
8 by Hemi to text Nicole about it because I was having
9 nightmares about like blood running down my arms and my legs,
10 because it was a very traumatic miscarriage. I had to have an
11 emergency room abortion.

12 And she recommended that I go to Grace Cathedral to
13 try to recover.

14 Q What was your emotional state in the months after your
15 miscarriage?

16 A Devastated. I was a shell. I wanted nothing more than
17 to be a parent.

18 Q At the time Yia directed you to perform sexual acts for
19 Reese Jones, were you still dealing with the emotional effects
20 of your miscarriage?

21 A Yes.

22 Q Had you informed Yia of your miscarriage?

23 A Yes.

24 Q Now, you mentioned after the audition that you toured
25 Reese Jones's house with Yia. Was Reese Jones there when you

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1 were shown around?

2 A Not to my recollection.

3 Q And at that time, what, if anything, did Yia tell you to
4 do as Reese Jones' handler?

5 MS. BONJEAN: Objection. Hearsay.

6 THE COURT: Overruled.

7 A She told me to practice my top, and she specifically
8 pointed to the dog collar and the leash, especially, and then
9 it was some sort of whip, also.

10 Q What, if anything, did she tell you to do with the dog
11 collar and leash?

12 A To walk him around the room like he was a puppy.

13 Q Walk Reese Jones?

14 A Yes.

15 Q And what, if anything, did she tell you to do with the
16 whip?

17 A To whip him and practice being the one in control.

18 Q At that time, were you interested in that kind of sexual
19 activity?

20 A No. It made me very uncomfortable.

21 Q How did you feel when you saw this sex toys?

22 A It was a lot of sex toys. It was a kind of mind blowing
23 amount.

24 I felt embarrassed. I felt nervous. I am not a
25 BDSM person. I am definitely not a top. And so it was very

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1 difficult to try to imagine performing those acts.

2 Q After the tour of Reese Jones's house, what happened
3 next?

4 A I believe I moved in.

5 Q Where was Reese Jones' house located, if you remember?

6 A At the top of the hill above Chinatown.

7 Q Earlier you talked about some of the sexual activity Yia
8 directed you to do, including topping. What do you mean by
9 that?

10 A It's being the dominant position in sex, often being very
11 forceful and aggressive, especially in the BDSM world.

12 MS. GUPTA: I'd like to show you now Government
13 Exhibits 56 and 57, which are in evidence. And we can just
14 put those side by side.

15 Q Do you recognize these photos?

16 A I do.

17 Q What are they?

18 A That's Reese's house.

19 MS. GUPTA: I'd like to now show the witness only,
20 Government Exhibits 58 and 59.

21 Q Do you recognize these photos?

22 A Yes.

23 Q What do they depict?

24 A The deck at Reese's house on the upper level.

25 Q Are these a fair and accurate depiction of Reese Jones'

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1 decks in his house?

2 A Yes.

3 MS. GUPTA: Your Honor, we move to admit Government
4 Exhibits 58 and 59.

5 THE COURT: Any objection?

6 MR. ROBOTTI: No objection.

7 MS. BONJEAN: No objection.

8 THE COURT: Government Exhibits 58 and 59 are
9 admitted.

10 (Government Exhibits 58 and 59 received in
11 evidence.)

12 BY MS. GUPTA:

13 Q And can you describe for the jury what these exhibits
14 show?

15 A His house was multi stories. I don't remember how many
16 stories exactly. And there were decks I think on every floor,
17 but definitely on the top floor, at least.

18 Q Did you perform any labor or services related to either
19 of these decks?

20 A Not that I can recall.

21 MS. GUPTA: I'd like to now show the witness what's
22 been admitted as Government Exhibit 60.

23 Q Do you recognize this?

24 A Yes.

25 Q What is it?

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1 A That's the top floor of Reese's house.

2 Q Did you live on the top floor with Reese?

3 A No. My bedroom was, I think, in the floor below, if I am
4 remembering the levels correctly.

5 His son did walk in on me while I was performing
6 fellatio on the couch.

7 MS. BONJEAN: Objection.

8 THE COURT: Yeah. I am going to sustain, and I am
9 going to strike that answer.

10 MS. GUPTA: We can take that down. Thank you.

11 BY MS. GUPTA:

12 Q What were you expected to do when you were living with
13 Reese Jones?

14 MS. BONJEAN: Objection. Foundation.

15 THE COURT: Sustained.

16 Q You mentioned there came a time when you moved into Reese
17 Jones' house. For approximately how long did you live there?

18 A Maybe two or three months.

19 Q And what was your schedule like while you were there?

20 A It was very busy. I was working -- so I would wake up,
21 make him breakfast. He was usually still asleep, so I would
22 leave breakfast on the nightstand, and then I would leave to
23 go to morning practice that started at 7:00. And then I would
24 go to the church where I worked as the office person, and then
25 eventually I would go and take care of a friend's kid that I

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1 started nannying for a little bit later in my time at Reese's
2 house. And then I would go home and take him for walks, Reese
3 or the dog.

4 We -- I would invite him to meetings that I had at
5 the church. He only came to one of them. We went on a lot of
6 walks with Baxter. We would go out to dinner, and then -- or
7 we would like stay in bed and watch a movie. And we would
8 also have a lot of sex.

9 Q How did you know what you were supposed to do with him?

10 A Maddie and Yia had told me what to do. Everything else
11 was assumed.

12 Q Did you report back to people at OneTaste regarding what
13 you were doing with Reese?

14 A Yes.

15 Q Did you report back to Nicole?

16 A Very rarely. Every once in a while she would text and
17 check in, be like, oh, I heard someone came to your church
18 talk or something like that.

19 Q Did you report back to Yia regarding what you were doing
20 with Reese?

21 A She would check in every once in a while, and I would
22 report. Yeah.

23 Q Did you view your living with Reese as part of your job
24 at OneTaste?

25 A Very much so.

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1 Q Were you paid to do it?

2 A No.

3 Q Why did you decide to do it?

4 A I had moved out of 1080 to live with my then boyfriend,
5 and I got pregnant. And then when I had the miscarriage in
6 the second trimester, it was so traumatic that it broke us up.
7 And I didn't have anywhere else to live, so I asked if I could
8 move back into 1080.

9 And I knew that I wanted to -- like that was my
10 support system, and so I felt like I had to prove myself and
11 that I was worthy of being there again.

12 Q Did you enjoy the sexual activity with Reese Jones?

13 MS. BONJEAN: Objection to the relevance.

14 THE COURT: Overruled.

15 A No. It wasn't devoid of pleasure, but, no, I did not
16 enjoy it.

17 Q Are you familiar with the concept of getting off on any
18 stroke?

19 A Yes.

20 Q What does it mean?

21 A It means that you -- you're turned on or you allow
22 yourself to be turned on or get yourself turned on by anything
23 that can happen. So it doesn't matter what the situation is,
24 you find the turn on in it.

25 Q How, if at all, did that relate to your sexual

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1 relationship with Reese Jones?

2 A It was a practice of it, right. Like I had to practice
3 finding that pleasure in my sexual encounters with him, even
4 when it was begrudgingly.

5 Q Now, you mentioned sometimes reporting back to people
6 about your care of Reese. Who did you understand to be the
7 primary person who was in charge of his care?

8 A Outside of myself?

9 Q Yes.

10 A Probably Yia or Maddie.

11 Q Did others at 1080 know that you were sexually servicing
12 Reese, to your knowledge?

13 A Yes. People would ask me how it was going there. They
14 knew that I was living there.

15 Q Now, you said that you continued having a room at 1080
16 while you were living with Reese. Why is that?

17 A Because I was told that I had to, if I wanted to be able
18 to keep the room that -- like, I couldn't just move out and
19 then move back in once I was done. I had to maintain my
20 residence at 1080 or -- yeah. I just remember being told that
21 I had to maintain my residence at 1080. And I remember being
22 very upset, and Rachael Hemsli and I got into an argument about
23 it.

24 Q Do you remember who told you you had to maintain
25 residence at 1080?

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1 A Rachael Hemsli.

2 Q Did you have an understanding of why you had to maintain
3 a residence there, if you weren't living there?

4 A No. Because I remember being very confused. And I
5 think, if I am remembering correctly, the argument was that
6 when Nicole came to visit, I had to leave. And so if I wanted
7 somewhere to stay, I had to be paying rent.

8 Q Were you required to continue to pay rent at 1080 while
9 leaving at Reese Jones' house?

10 A Yes.

11 MS. BONJEAN: Objection.

12 THE COURT: Sustained.

13 Q Did you pay rent at 1080 while living at Reese Jones'
14 house?

15 A Yes.

16 Q Do you have an understanding of why?

17 MS. BONJEAN: Same objection.

18 THE COURT: I think this has been asked and answered
19 at this point. Move on to the next question, please.

20 BY MS. GUPTA:

21 Q How did that affect your financial status?

22 A It just put me in an even tighter financial bind where I
23 didn't have access to accrue any wealth.

24 Q How did your time at Reese Jones' house come to an end?

25 A He was getting very depressed and very sad. I am not

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1 entirely sure of the circumstances why. And I came home one
2 night, and he had drank an entire bottle of, I'm assuming,
3 vodka. I don't know exactly what type of alcohol it was. It
4 was a hard alcohol. And he was obliterated. And I am such a
5 small person, there was no way I could have helped him into
6 his room at all so I had to call Maddie and Yia for
7 reinforcements.

8 Q Did there come a time when you were dismissed from your
9 position as Reese Jones' handler?

10 A Yes. I believe he went into rehab, but it was at that
11 point that I was dismissed. I was no longer needed.

12 Q Who dismissed you?

13 A I believe it was Yia.

14 Q During the time that you were assigned to sexually
15 service Reese Jones, were you in a relationship with anyone
16 else?

17 A Yes.

18 MS. GUPTA: Showing you, for the witness only,
19 Government Exhibit 415.

20 Q Do you recognize this?

21 A Yes.

22 Q Who is it?

23 A Rob Bakhshai.

24 Q Is this a fair and accurate depiction of Rob Bakhshai?

25 A Yes.

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1 MS. GUPTA: Your Honor, we move to admit Government
2 Exhibit 415.

3 THE COURT: Any objection?

4 MR. ROBOTTI: No objection.

5 MS. BONJEAN: No objection.

6 THE COURT: Government Exhibit 415 is admitted.

7 (Government Exhibit 415 received in evidence.)

8 BY MS. GUPTA:

9 Q Who's pictured here, Ms. Gill?

10 A Rob Bakhshai.

11 Q How did you meet Mr. Bakhshai?

12 A He was in one of the coaching programs.

13 Q When, approximately, did you meet?

14 A I think in September-ish of -- so fall of 2012.

15 Q What was the nature of your relationship with him?

16 MS. BONJEAN: Objection to the vagueness of that
17 question.

18 THE COURT: Overruled.

19 Q You can respond.

20 A I mean, we -- it didn't start off super hot. We started
21 talking after hanging out on the front bench smoking
22 cigarettes at night, and then we made out and slowly started
23 talking. He lived in Texas at the time. And it just kind of
24 took off from there, and we decided to try dating.

25 Q Were your feelings for him genuine?

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1 A Very.

2 Q Were OneTaste leaders aware of your relationship with
3 Robert Bakhshai?

4 A They were.

5 MR. ROBOTTI: Objection.

6 THE COURT: Basis?

7 MR. ROBOTTI: Calls for speculation about their
8 state of mind.

9 THE COURT: Sustained.

10 BY MS. GUPTA:

11 Q Did you inform others at OneTaste about your relationship
12 with Robert Bakhshai?

13 A I did.

14 Q Did you inform the core staff?

15 A Yes.

16 Q Did you inform Rachel Cherwitz?

17 A Yes.

18 Q Did you inform Nicole Daedone?

19 A Yes.

20 Q How, if at all, did OneTaste leaders respond to your
21 relationship with Robert Bakhshai?

22 A Very negatively.

23 MS. BONJEAN: Objection.

24 THE COURT: Yes. Sustained at to form.

25 BY MS. GUPTA:

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1 Q How, if at all, did Nicole Daedone respond to your
2 relationship with Robert Bakhshai?

3 A She ended up texting me at one point after Yia and I got
4 into a very strong disagreement. And she told me that Yia was
5 not wrong and that I was not standing in my full power as a
6 woman, that I was taking him away from his ability to be a
7 turned on man, and that I should not be in a relationship with
8 him.

9 Q What was your understanding of why Nicole Daedone and Yia
10 Vang did not want you to be in a relationship with Robert
11 Bakhshai?

12 MS. BONJEAN: Objection.

13 THE COURT: Sustained.

14 Q Did you have any understanding of why Yia Vang said these
15 things to you about your relationship with Robert Bakhshai?

16 A It was couched in that I was putting myself to sleep and
17 that I was undoing all of the work that I had done throughout
18 my time at OneTaste. And I also believed and still believe
19 that --

20 MS. BONJEAN: Objection to the extent it calls for
21 speculation.

22 THE COURT: Overruled.

23 Q You can continue.

24 A Thank you.

25 That it was -- they had plans for Rob and for me,

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1 and I would no longer be able to perform any of the services
2 if I was in a monogamous relationship.

3 Q What was your understanding of OneTaste leaders' plan for
4 Robert Bakhshai?

5 MS. BONJEAN: Objection. Foundation.

6 THE COURT: Yes. Sustained.

7 Q You mentioned that you believed there to be a plan for
8 Robert Bakhshai. Did you have any understanding as to what
9 that plan was?

10 A He was going to be learning how to be a master stroker
11 from Ken Blackman. And he's a good-looking guy. Who wouldn't
12 want a good-looking guy on your team.

13 Q What is a master stroker?

14 A It's usually a man who is stroking the woman's clitoris
15 during an OM, and has accrued so many hours, it is like having
16 a masters degree in it.

17 Q And you testified that you believed there to be a plan
18 for you as well. What was your understanding of that plan?

19 MS. BONJEAN: Objection. Foundation.

20 THE COURT: Sustained.

21 Q Did you understand there to be a plan for you by Nicole
22 Daedone?

23 A Yes.

24 Q What was that plan?

25 A To continue to take care of Reese. I kept being pushed

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1 into a relationship with Reese.

2 Q Did there come a time when Robert and you discussed
3 living in the same city?

4 A Yes.

5 Q Did you discuss those plans with Yia Vang?

6 A Yes.

7 Q And what, if anything, happened next?

8 A The next day Rob called me and told me that Yia had
9 called him and offered him a job at OneTaste Las Vegas where
10 he could learn from Ken.

11 Q How did you respond to that news?

12 A I was very angry and very hurt.

13 Q Was Robert aware at the time that you were assigned to
14 sexually service Reese Jones?

15 MS. BONJEAN: Objection.

16 MR. ROBOTTI: Objection.

17 THE COURT: Sustained.

18 BY MS. GUPTA:

19 Q Was Robert aware that you were sexually servicing Reese
20 Jones?

21 MS. BONJEAN: Objection.

22 MR. ROBOTTI: Objection.

23 THE COURT: Sustained.

24 Q Did you tell Robert that you were sexually servicing
25 Reese Jones?

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1 A Yes.

2 Q What was his reaction?

3 A He was also very upset about it because we were wanting
4 to try monogamy, which was not a popular plan of action for
5 relationships at OneTaste.

6 Q What is your understanding of why that wasn't a popular
7 plan of action?

8 A Because then I wouldn't be available to have sex with
9 anyone else.

10 Q Are you familiar with the phrase "pollinate more
11 flowers," as it was used at OneTaste?

12 A Yes.

13 Q What does it mean?

14 A To have sex with as many people as you can.

15 Q How did you view your sexual activity with Reese as
16 compared to your relationship with Robert?

17 MS. BONJEAN: Objection to when.

18 THE COURT: Sustained.

19 Q During the time that you were sexually servicing Reese
20 and in a relationship with Robert, how did you compare the
21 two?

22 A I was head over heels in love with Robert. Reese was a
23 job.

24 Q Did you ever discuss your relationship with Robert with
25 Rachael Hems?

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1 A Yes.

2 Q Did Rachael Hemsí ever discourage or encourage you from
3 pursuing a relationship with Robert?

4 A Yes.

5 Q What did she do?

6 A She discouraged me. She -- I told her that I wanted to
7 do 30 days of monogamy with Rob, and it was something that I
8 had been working on in therapy and talking to my therapist
9 about. And she said that she couldn't see me doing it with
10 Rob because he was selling goo, and that I should try it with
11 Reese. And even though I continued to say I didn't feel that
12 with Reese, I feel it with Rob, I am not interested in Reese,
13 it kept being pushed on me.

14 Q Pushed on you by who?

15 A Rachael Hemsí. In that particular conversation.

16 Q Did you ultimately try the 30 days of monogamy?

17 A No.

18 Q Why not?

19 A I wasn't allowed.

20 Q Who didn't allow it?

21 A You know, Nicole had texted me about how unhealthy that
22 was for me and how bad it would be for me. Yia told me how
23 bad it would be for me, that it would kill me, that I just
24 don't do well in relationship. Rachael Hemsí told me the same
25 thing.

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1 Q And how did hearing these statements make you feel?

2 A Horrible. It was devastating because I was starting to
3 wake up again to my own internal conscience, and I knew that I
4 wanted to be with him, and I just didn't understand how they
5 could be so against me just trying 30 days of monogamy.

6 Q Was Yia Vang's view of your relationship important to
7 you?

8 A Very. She was my mentor.

9 Q Was Rachael Hemsis's view of your relationship important
10 to you?

11 A Very.

12 Q Why?

13 A She -- I mean, she was the house mom, and she was the one
14 who sat there with me during the emergency room abortion.

15 Q Was Nicole Daedone view of your relationship important to
16 you?

17 A Yes.

18 Q Why?

19 A Because she -- I mean, she was the head teacher. She had
20 all of the knowledge that she bequeathed to us, and I idolized
21 her.

22 Q What, ultimately, happened between you and Robert?

23 A I mean, we -- I ended up leaving OneTaste because of all
24 of that, and we continued to try to date, and then he moved to
25 the East Coast with me when I started grad school. But there

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1 was too much trauma and our relationship didn't make it.

2 Q I'd like to now show you a series of photographs.

3 MS. GUPTA: Can we show Government Exhibit 239,
4 which I believe is in evidence.

5 THE COURT: It is not in evidence.

6 MS. GUPTA: Oh. Apologies. Just for the witness.

7 THE COURT: I don't believe it is.

8 BY MS. GUPTA:

9 Q Do you recognize this, Ms. Gill?

10 A The face looks familiar, but I couldn't tell you a name.

11 MS. GUPTA: Can we show the witness only Government
12 Exhibit 260. Apologies. This one is in evidence. We can
13 show it to the jury as well.

14 BY MS. GUPTA:

15 Q Do you recognize this person?

16 A Lianna Lifson.

17 Q How do you know her?

18 A She and I were friends before we got into OneTaste.

19 MS. GUPTA: Could we go to Government Exhibit 228.
20 And this has already been admitted.

21 Q Do you recognize this person?

22 A No.

23 MS. GUPTA: Can we go to Government Exhibit 382,
24 which has already been admitted.

25 Q Do you recognize this person?

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1 A Becca.

2 Q How do you know her?

3 A She was dating someone that I was dating in the middle of
4 my time at OneTaste.

5 MS. GUPTA: Government Exhibit 265, please, which is
6 in evidence.

7 Q Do you recognize this person?

8 A Her face is familiar, but I couldn't tell you a name.

9 Q Government Exhibit 269. Do you recognize this person?

10 A No.

11 Q Government Exhibit 404?

12 A No.

13 Q Do you recognize -- sorry. Just to complete the
14 question.

15 Do you recognize this person?

16 A No.

17 Q And Government Exhibit 327. Do you recognize this
18 person?

19 A No.

20 MS. GUPTA: Your Honor, can I ask when you're
21 planning to take a lunch break? I just want to plan, since we
22 have some exhibits we are working on, as previously discussed.

23 THE COURT: Not before 12:45.

24 MS. GUPTA: Can I have a moment, please.

25 THE COURT: Yes.

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1 (Short pause.)

2 MS. GUPTA: Your Honor, I'd like to go back to
3 Government Exhibit 4518, for the witness only.

4 THE COURT: Go ahead.

5 Q Ms. Gill, do you see this on your screen?

6 A I still see a picture on my screen.

7 Q Sorry. One second.

8 Who are these messages with?

9 A Rachel Cherwitz.

10 Q And what date do the messages start on?

11 A September 5, 2012.

12 Q And can you see what date the messages end on?

13 MS. GUPTA: And, Mr. McNett, can you just flip
14 through them.

15 A Is that it?

16 Q (Indicating).

17 A September 18, 2012.

18 Q Could you look at the page numbers on the bottom. Do you
19 see those, where it says Government Exhibit 4518?

20 A Uh-huh.

21 Q What page numbers do you see?

22 A 20 -- 23. 24. 25. 26. 27. 28.

23 MS. GUPTA: And, Your Honor, this is a slightly
24 modified version that we have created.

25 THE COURT: Do I have it?

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1 MS. GUPTA: I can pass you up a copy.

2 THE COURT: You are going to need to remark this
3 because you already talked about an exhibit, and now you're
4 telling me it has changed, right?

5 MS. GUPTA: Understood.

6 THE COURT: So why don't you call it something else
7 at this time.

8 MS. GUPTA: It's 4518-1.

9 THE COURT: Okay. Do you have it, Ms. Cohen?
10 Mr. Robotti? Ms. Bonjean?

11 MR. ROBOTTI: I don't believe we have the revised
12 version.

13 MS. BONJEAN: We don't have it marked as such.

14 THE COURT: I want to make sure you know exactly
15 what is being given to the witness and that was handed up to
16 me. So we need to take a moment to consult with the
17 government on that.

18 MS. GUPTA: One moment, Your Honor.

19 (Short pause.)

20 BY MS. GUPTA:

21 Q Ms. Gill, if you can remind us, what pages do you have?
22 23 through?

23 A I think 28, if I recall correctly.

24 Q And what is the time period of these text messages?

25 A Maybe two weeks.

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1 Q And are all of these communications with Rachel Cherwitz?

2 A Yes.

3 Q How do you recognize this exhibit, 4518-1?

4 A They're screenshots from my phone that I took.

5 Q And do these reflect the entirety of the messages that
6 you exchanged with Rachel Cherwitz in this time period?

7 A As far as I can remember, yes.

8 Q Just from this limited date range in September?

9 A Right.

10 Q Is this a fair and accurate depiction of the text
11 messages that you exchanged with Rachel Cherwitz during this
12 time?

13 A Yes.

14 MS. GUPTA: Your Honor, we would move to admit
15 Government Exhibit 4518-1.

16 MS. BONJEAN: Judge, we would object. We would
17 object. But, also, if the Court is inclined, we need to voir
18 dire on this.

19 THE COURT: I am going to sustain the objection on
20 the foundation that's been laid with respect to the offer of
21 the entirety of the document.

22 (Continued on the next page.)

23

24

25

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1 (Continuing.)

2 BY MS. GUPTA:

3 Q Looking at this exhibit, Ms. Gill, you took these
4 screenshots, correct?

5 A Yes.

6 Q Now, during this time in or about September 2012, what
7 was Rachel Cherwitz's role at OneTaste?

8 A I think head of sales, but I -- I couldn't -- I
9 couldn't tell you exactly.

10 Q Would she provide you with instructions for your job?

11 A Yes.

12 Q And what are some of the ways in which you and Rachel
13 Cherwitz would communicate?

14 A By text.

15 Q Would she communicate instructions to you regarding
16 your job via text, as well?

17 A Yes.

18 Q In around this time period, would you sometimes send
19 Rachel Cherwitz photos?

20 A Yes.

21 Q What was the purpose of that?

22 A She asked me to send those to her because she had used
23 my phone to take them and she wanted them.

24 Q And do you recognize the people in the photos?

25 A Yes.

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1 Q Are some of the screenshots cut off?

2 A Yes.

3 Q Why is that?

4 A Because when I was trying to take those screenshots, I
5 was trying to get the fullness of the text thread, so I
6 would overlap them.

7 Q And by overlapping them, do you mean that you would
8 include the next message?

9 MS. BONJEAN: Objection.

10 THE COURT: Sustained as to the leading.

11 Q Sorry. Can you explain what you mean by overlapping?

12 A Yeah. The -- you can't screenshot an entire
13 conversation, so I would screenshot what was available on
14 the screen, and then I'd scroll up and keep a portion of the
15 part that had been cut off so that it was apparent that
16 that's where the conversation had started in the pictures.

17 Q And is this a fair and accurate depiction of text
18 messages that you exchanged with Rachel Cherwitz in
19 September 2012, between September 5th and September 18th?

20 A Yes.

21 MS. GUPTA: Your Honor, we would move to admit
22 Government Exhibit 4518-1 into evidence.

23 MS. BONJEAN: We have the same objection.

24 MR. ROBOTTI: Same objection.

25 THE COURT: Sustained. To the extent you're

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1 offering the entire document, sustained.

2 MS. GUPTA: Your Honor, could we have a moment?

3 THE COURT: I'd like you to move on to something
4 else because I don't want to keep the jury waiting. You can
5 return to this.

6 MS. GUPTA: Understood.

7 Your Honor, if we could go back to, for the
8 witness only, Government Exhibit 4520. We've marked a new
9 one, 4520-1.

10 THE COURT: Has this been given to the defendants
11 and the Court?

12 MS. GUPTA: We have a copy right here, Your Honor.
13 And I can tell you, since it's in your binder, Your Honor,
14 4520-1 is simply the Exhibit 4520, pages 37 through 48. For
15 defense counsel, as well.

16 THE COURT: So it's pages 37 to 38?

17 MS. GUPTA: 48.

18 THE COURT: 48 of what was 4520?

19 MS. GUPTA: Correct, Your Honor.

20 And could we pull this up for the witness, please?
21 Thank you.

22 THE COURT: So I am missing some pages. I'm
23 missing pages 46 and 47.

24 MS. GUPTA: Your Honor, we can pass you up a copy.

25 MS. BONJEAN: We have two.

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1 THE COURT: Move on to something else. You can
2 come back to it.

3 MS. GUPTA: Understood.

4 THE COURT: Please move on to something else.

5 MS. GUPTA: Understood.

6 BY MS. GUPTA:

7 Q Ms. Gill, you mentioned there was a time that you left
8 OneTaste.

9 A Yes.

10 Q When, approximately, was that?

11 A The spring or summer of 2013, since I started grad
12 school in the fall of 2013.

13 Q What caused you to leave at that point?

14 A The interference and manipulation of my relationship
15 with Rob Bakhshai.

16 Q Why did you decide to leave at that point?

17 A I -- I had been having a lot of conversations with my
18 therapist, who I started seeing after the miscarriage,
19 around the nature of my relationship with Rob, especially
20 compared -- compared to my relationship with Reese, as well
21 as conversations with my pastor. And I remember my pastor
22 telling me, like --

23 MS. BONJEAN: Objection.

24 THE COURT: Yes, you objected?

25 MS. BONJEAN: Objection.

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1 THE COURT: Sustained.

2 Q Where were you living at that point?

3 A Which point?

4 Q At the point that you decided to leave OneTaste.

5 A I was a live-in nanny for my friends who had been
6 involved in OneTaste. They had just had a baby.

7 Q When you left OneTaste, where did you go?

8 A I went -- I went to -- well, I went to their house
9 first, because I was -- I was done. And then I eventually
10 left to go to the East Coast for grad school.

11 Q Following your departure, did anyone who was part of
12 the core staff at OneTaste reach out to you?

13 A Yes.

14 Q Who?

15 A I -- well, I had two different amends made to me; one
16 by Rachael Hemsli around a ding, a very large ding on the
17 side of my car and wanted to give me money even though I had
18 already sold the car. And then the other amends was from
19 Yia Vang.

20 Q What does it mean to make amends?

21 A To apologize and try to repair the relationship.

22 Q When, approximately, did this happen?

23 A I was living in Texas at the time, so I -- I think it
24 was around 2016, but it may have been late 2015.

25 Q You said that Rachael Hemsli is related to a ding on

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1 your car.

2 Was there anything else as part of the amends?

3 A No. She made the amends to say sorry for -- I told you
4 that I would pay for it, and I never did, I'd love to give
5 you money now. And she gave me \$500.

6 Q And you testified that Yia reached out to you, as well?

7 A Yes.

8 Q What were her amends?

9 MR. ROBOTTI: Objection. It's hearsay.

10 MS. GUPTA: 801(d)(2), Your Honor, subject to
11 connection, or as an agency statement.

12 MR. ROBOTTI: Judge, specifically the in
13 furtherance prong.

14 THE COURT: Subject to connection, the objection
15 is overruled.

16 A So she called and apologized for not training me as a
17 sacred prostitute well enough and being jealous of me.

18 Q How did these amends affect you?

19 A That was the worst amends that I have ever received in
20 my entire life, and I told her so.

21 Q After you left OneTaste, did you ever hear from Nicole
22 Daedone or Rachel Cherwitz again?

23 A There was one point after I started grad school that
24 Nicole tagged me in something on Facebook about a celebrity
25 pastor, saying, she reminds me of you, and it felt like an

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1 attempt to do what she would call an upstroke.

2 And then there was another time where I came into
3 Manhattan and attended an event. And if I'm remembering
4 correctly, I was in conversation with Rachel Cherwitz about
5 that process, but it may have been a different person that I
6 had initially talked to.

7 Q So you mentioned Nicole Daedone tagging you in this
8 post.

9 Why did you view that as an upstroke?

10 A I had already left, and it just felt like an attempt to
11 hook me.

12 Q What do you mean by "hook" you?

13 A Make me feel positive emotions towards her, like she
14 cared about me.

15 Q When was the last time you spoke to Nicole Daedone?

16 A That would be the last time.

17 Q And when was the last time you spoke to Rachel
18 Cherwitz?

19 A When I went up to the OM demo in Manhattan.

20 Q When, approximately, was that?

21 A I think it was in 20- -- late 2013, maybe early 2014.

22 Q Was that after you left OneTaste?

23 A Yes.

24 Q Why did you attend a OneTaste event after leaving?

25 A I don't recall the exact reason why I chose to go. I

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1 remember meeting up with someone and walking through Chelsea
2 and talking, and then I was invited up. I don't remember if
3 I had already planned to go to the event or if it was a
4 last-minute decision.

5 I -- I had hoped that there were still
6 relationships that were genuinely loving and caring from my
7 time spent at OneTaste, and so I went because it felt
8 familiar, and I was -- I was hoping that some of those
9 relationships were genuine.

10 Q Did you go back to any OneTaste events after that?

11 A Never.

12 Q Why not?

13 A It repulsed me. It felt so grandiose. And I had
14 very -- I -- at that moment, I had very clearly seen how far
15 my values had been skewed through the coercion and the
16 conditioning.

17 Q In what way had your values been skewed?

18 MS. BONJEAN: Objection. Vague.

19 THE COURT: Overruled.

20 A I -- you know, I had really bought into the idea, into
21 what OM and OneTaste was selling. And when I was told over
22 and over again that, you know, oh, you're seen for this
23 sexual person and it's wonderful and it's beautiful, you
24 know, I embraced it. And then over time, I just -- I -- I
25 kept shifting my values to make accommodations for what was

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1 being asked of me.

2 Q At the time you left OneTaste, how would you describe
3 your financial state?

4 A Awful. I -- I had a job, at least, working at the
5 church, but I had -- I still had no savings or income
6 outside of my 30 hours a week at minimum wage.

7 Q You had described various labor and services that you
8 provided to OneTaste.

9 Were you ever paid money for any of that labor?

10 A Not that I can recall.

11 Q What was your physical condition like when you left
12 OneTaste?

13 A I -- I mean, I was still -- I was still recovering from
14 the miscarriage. I was -- I was -- and I was, like, in --
15 in and out of the hospital due to some serious tonsil
16 issues. I was a mess.

17 Q What was your psychological state like when you left
18 OneTaste?

19 A Even more of a mess. I felt so manipulated and
20 betrayed, and I felt -- I felt abandoned, and I felt like
21 there were -- there was such a huge abuse of power
22 difference from my teachers and who were supposed to be
23 protecting me in that really tender space around sexuality.

24 Q What do you mean by that?

25 A In all of my education and career-building as a clergy

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1 person, I have come to find that there are -- there's a
2 certain level of responsibility that needs to be taken when
3 you're dealing with those really tender spaces --

4 MS. BONJEAN: I'm going to object to this.

5 THE COURT: Sustained.

6 Q Earlier you testified about tender spaces around
7 sexuality.

8 What do you mean by that?

9 A Sex is such a vulnerable thing, right? Like, we -- we
10 engage in sexual practices, and it makes us very vulnerable
11 to the other person. And I was being asked to make myself
12 vulnerable in spaces that didn't entirely feel comfortable,
13 and I trusted those people who were in positions of power
14 over me.

15 Q Which people?

16 A Rachel, Nicole, Yia, Rachael; both Rachels.

17 Q What was your emotional state like when you left
18 OneTaste?

19 A I'm traumatized. I'm -- I'm still sorting through the
20 trauma in my therapy 13 years later.

21 Q What did you do after you left OneTaste?

22 A I went to grad school to get my Master of Arts.

23 Q And today, what do you do for a living?

24 A I'm a United Methodist pastor.

25 MS. GUPTA: Your Honor, could I have a moment?

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1 THE COURT: Yes.

2 (Pause in proceedings.)

3 MS. GUPTA: If we could go back to Government
4 Exhibit 4519 for the witness only.

5 Q Ms. Gill, what is this?

6 A Text messages between myself and Yia Vang.

7 Q And approximately, what date does this text exchange
8 start?

9 A December 9th, 2012.

10 THE COURT: Did you create a different version of
11 this? Because what I'm looking at is different than this.

12 MS. GUPTA: Yes, Your Honor, we did -- oh,
13 apologies. No, it's the same one.

14 THE COURT: Okay. Go ahead.

15 MS. BONJEAN: Judge, it does jump around.

16 THE COURT: Yes, it does. It does, indeed. I
17 don't know where this is going, but maybe ask your next
18 question.

19 MS. GUPTA: Your Honor, we're actually towards the
20 end, but there are just a few things we want to try to do
21 with the text messages. Would now be a good time for a
22 lunch break?

23 THE COURT: No, it would not actually be a good
24 time for a lunch break. We just came back an hour ago.

25 Do you have more that you can do?

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1 MS. GUPTA: I don't, Your Honor. I'm at the end.

2 THE COURT: Okay. We will take the lunch break,
3 then, now.

4 MS. GUPTA: Thank you, Your Honor.

5 THE COURT: The witness may step down.

6 (Witness leaves the stand.)

7 THE COURT: And the jury may come back at 1:30.
8 Enjoy your lunch.

9 Don't talk about the case. Don't let anyone talk
10 to you about it. And really just enjoy your lunch. 1:30.

11 (Jury exits.)

12 THE COURT: Everyone may be seated.

13 I am not sure why, with four attorneys and two
14 paralegals, the Government is having these issues. But I
15 can tell you when you seat a jury and tell them that the
16 trial can take approximately six weeks, the expectation is
17 not that there's going to be inefficiency; inability to know
18 what you're handing up, what you've given to the Court, what
19 you've given to your adversaries. This has got to change.
20 I am going to stop you next time and not permit you to go
21 back to issues and continue. This really has to change.

22 I came down after the break and I let the
23 Government know that your exhibits were missing pages. And
24 yet the jury comes out, the examination continues, and we're
25 still with exhibits that have not been provided to the Court

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1 and with pages missing. The defense needs to know what
2 you're showing to the witness, the Court needs to have that,
3 and you need to get your documents in order. I will not
4 allow you to waste this jury's time; anybody.

5 But Government, I'm, frankly, shocked that this is
6 happening. Take the next hour to get your exhibits in
7 order, and I don't expect to see this again.

8 MS. FARRELL: Understood, Your Honor. It won't
9 happen again.

10 May I have your binder? Because I think part of
11 the issue is that what we have is clearly not what you have
12 and I need to --

13 THE COURT: No. You know what? I've have marked
14 up some things in my binder. You cannot have my binder.

15 MS. FARRELL: Understood.

16 THE COURT: You can hand up to me whatever it is
17 you're going to be handing to the witness. If it's
18 something that you want me to look at ahead of time, you can
19 give it to me then or tell me what it is, but no, you may
20 not have my binder.

21 MS. FARRELL: Understood, Your Honor. Thank you.

22 THE COURT: We will be back at 1:30, and I expect
23 this to go differently. I had made very clear we were not
24 going to have a lunch break one hour after we had just come
25 back. I gave you the courtesy of doing that today. It

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1 won't happen again. You will be done with your examination
2 if this happens again.

3 MS. FARRELL: Understood, Your Honor.

4 May we ask a question before you leave the bench?

5 THE COURT: Yes.

6 MS. FARRELL: With respect to -- I genuinely do
7 not understand the sustained objection with respect to the
8 limited Rachel Cherwitz texts. So if Your Honor
9 could just --

10 THE COURT: You haven't laid a proper foundation
11 for the admission of all of it.

12 MS. FARRELL: Okay.

13 THE COURT: Okay.

14 MS. FARRELL: Thank you.

15 THE COURT: See you at 1:30.

16 (Lunch recess taken.)

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AFTERNOON SESSION

(Time noted 1:30 p.m.)

(Judge enters.)

THE COURT: We can bring the witness in and --

MS. GUPTA: Your Honor, may I approach with an exhibit?

THE COURT: Yes.

(Counsel approaches.)

(Jury enters.)

THE COURT: Everyone may be seated. I hope everyone had a good lunch.

Ms. Gupta, you may continue your examination.

MS. GUPTA: Thank you, Your Honor.

CONTINUED DIRECT EXAMINATION

BY MS. GUPTA:

Q Ms. Gill, I would like to circle back to some of your earlier testimony regarding some communications you had while you were at OneTaste.

Drawing your attention to approximately September 2012, were you in communication with Rachel Cherwitz at that time?

A Yes.

Q How would you communicate with her?

A By phone, by text message.

Q At any point did you provide screenshots of your text

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1 messages between you and Rachel Cherwitz to the Government?

2 A I did.

3 Q And how did you provide those screenshots?

4 A I believe I sent them by text message to an agent.

5 Q I would like to show you now what's been marked as
6 Government Exhibit 4518-A.

7 (Exhibit published.)

8 Q Do you recognize this document?

9 A Yes.

10 Q What is it?

11 A It's a text between myself and Rachel Cherwitz.

12 Q And what date does this text message exchange start?

13 A September 9, 2012.

14 MS. GUPTA: I'll just ask Mr. McNett to flip through
15 to see what date it ends.

16 Q What's the last date of the text messages?

17 A September 19, 2012.

18 Q And is this a subset of the texts you provided to the
19 Government?

20 A Yes -- I'm sorry, I don't know what a subset is.

21 Q Is this an excerpt of the texts that you provided to the
22 Government?

23 A Yes.

24 Q And does this contain any discussions of your work at
25 OneTaste?

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1 A Yes.

2 Q Is this a true and accurate copy of screenshots of texts
3 between you and the defendant Rachel Cherwitz between
4 September 9, 2012 and September 19, 2012?

5 A Yes.

6 Q And the person listed here at the top of the texts it
7 says Raheli. Who is Raheli?

8 A Rachel Cherwitz.

9 Q Was that one of her names?

10 A Yes.

11 Q And what is RC?

12 A It's her initials, Rachel Cherwitz.

13 MS. GUPTA: Your Honor, we would move to admit
14 Government Exhibit 4518-A.

15 MR. ROBOTTI: We maintain our objection.

16 MS. BONJEAN: Same.

17 THE COURT: The objection is overruled.

18 (Government Exhibit 4518-A received in evidence.)

19 MS. GUPTA: Thank you, Your Honor.

20 Could we please publish to the jury?

21 (Exhibit published.)

22 BY MS. GUPTA:

23 Q Looking at this text message exchange who is the person
24 in the blue?

25 A Those are my text messages.

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1 Q And who is the person in the black and white?

2 A Rachel's.

3 Q And looking at this conversation between you and Rachel
4 Cherwitz on September 9th --

5 MS. GUPTA: And I'll ask Mr. McNett to scroll down a
6 little bit.

7 Q What are you all discussing here?

8 A A garage clicker that she was wanting.

9 Q For what purpose?

10 A I have -- I have no recollection.

11 Q And why did you have the garage clicker?

12 A I was probably running errands.

13 MS. BENSING: Continuing on the second page,
14 Mr. McNett.

15 Q Rachel Cherwitz appears to send you a series of messages.
16 Do you see that?

17 A I do.

18 Q And what is your understanding of why there's a number of
19 messages here?

20 A I wasn't quick enough to respond and she needed the
21 garage clicker more urgently.

22 Q How quickly did you feel you needed to respond to Rachel
23 Cherwitz typically?

24 A As soon as I got a text message in.

25 MS. GUPTA: Could we go to the next page,

1 Mr. McNett? Could you scroll down a little bit? Thank you.

2 BY MS. BENSING:

3 Q So, here looking towards the middle of the page, Rachel
4 Cherwitz says, "Where is Ken? Where is he right now, I mean."

5 Who is Ken?

6 A Ken Blackman.

7 Q And then you responded, "Ken? Do you want me to do
8 something?"

9 Why did you respond in that way?

10 A She wouldn't have been asking if she didn't need me to do
11 something with Ken.

12 MS. GUPTA: Mr. McNett, could we scroll down,
13 please?

14 Q You're referencing someone named Blake here. Who is
15 Blake?

16 A He was a student. I can't recall his last name.

17 Q Rachel Cherwitz writes here, "Who? I need him to be
18 handled, Lord help me, where is Blake? He was supposed to be
19 his handler. Blake is supposed to be handling Ken."

20 What do you understand her to mean by that?

21 MS. BONJEAN: Objection.

22 THE COURT: Overruled.

23 A Blake was making sure that Ken was prepared for a course
24 that he was getting ready for and making sure that he had
25 everything that he needed, that he was grounded and turned on.

1 Q And what did you understand "handler" to mean in this
2 context?

3 A Taking care of his needs, whatever those needs might be.

4 MS. GUPTA: Mr. McNett, could we go down -- thank
5 you.

6 BY MS. BENSING:

7 Q So you respond, "I don't know where he's at." And Rachel
8 Cherwitz goes on to say, "So Ken isn't being handled, yes,
9 will you stroke him? Ken, I mean."

10 What did you understand her to mean by that?

11 A That was a male OM, so a handjob.

12 Q And you responded, "Want me to do something?"

13 Why did you say that?

14 A I was responding to "So Ken isn't being handled," I was
15 responding to that question with that.

16 Q And then you said "Yes."

17 What were you saying "yes" to?

18 A "Will you stroke him, Ken, I mean."

19 Q And did you, in fact, stroke Ken?

20 A I did.

21 MS. GUPTA: Mr. McNett, could we go down?

22 Q Here Rachel Cherwitz writes, "Text me after you stroke
23 him. Excellent. Did you take him over?"

24 What did you understand her to mean by that?

25 A She was asking if he had an orgasm.

Gill - Cross - Robotti

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1 Q And can you read your response here?

2 A "All stroked and happy. I did."

3 MS. GUPTA: Mr. McNett, we can remove that.

4 Q So, scrolling down on September 18, 2012, can you read
5 your message there?

6 A "Can I read my inventory to you?"

7 Q What are you referring to there?

8 A I wanted to call her and read her my fear inventory.

9 Q Is that the fear inventory that you testified to earlier?

10 A Yes.

11 MS. GUPTA: Your Honor, may I have a moment?

12 THE COURT: Yes.

13 (Pause in proceedings.)

14 MS. GUPTA: No further questions.

15 THE COURT: Any cross-examination?

16 MR. ROBOTTI: Yes, Your Honor.

17 THE COURT: Go ahead, Mr. Robotti.

18 CROSS-EXAMINATION

19 BY MR. ROBOTTI:

20 Q Good afternoon, Ms. Gill.

21 A Good afternoon.

22 MR. ROBOTTI: May I have a moment, Your Honor.

23 THE COURT: Yes.

24 (Pause in proceedings.)

25 BY MR. ROBOTTI:

Gill - Cross - Robotti

1344

1 Q Ms. Gill, you started participating in OneTaste courses
2 in 2009?

3 A Thereabouts, either late 2009 or early 2010.

4 Q You left OneTaste in February 2013; is that right?

5 A Thereabouts, yes.

6 Q So about four years overall?

7 A Yup.

8 Q And at the time you started participating in OneTaste,
9 you were living in San Francisco?

10 A Yup.

11 Q And you knew OneTaste practiced orgasmic meditation at
12 the time you signed up; right?

13 A Yes.

14 Q And you also knew it was a group informed to improve
15 women's sexuality and women's sex life; right?

16 A Yes.

17 Q And at the time you started OneTaste you were in your
18 mid-20s?

19 A Yes.

20 Q And so you were an adult; correct?

21 A Can you define "adult"?

22 Q Over 18 years old.

23 A Yes, I was over the age of 18.

24 Q And you had a college degree at that time?

25 A I did.

Gill - Cross - Robotti

1345

1 Q A Bachelor's degree in English and French?

2 A Yes.

3 Q And that was from UC Santa Barbara, right?

4 A Yes.

5 Q It's fair to say you're well-educated?

6 A I did have a lot of opportunities for higher education.

7 Q And you came from a family that lived in California;
8 right?

9 A Yes.

10 Q And your parents were both employed when you were growing
11 up; correct?

12 A No.

13 Q Your father was a police officer?

14 A Yes.

15 Q And did your mother work?

16 A Not until I was older.

17 Q Okay. At the time you started participating in OneTaste,
18 you wanted to do that; right?

19 A I -- I found a lot of relief and joy in being celebrated
20 for being a sexual human, yes.

21 Q So when you decided to move into 1080 and you starting
22 doing the courses, you wanted that; right?

23 A Yes. I was very, like I said, excited about having that
24 aspect celebrated when it had not been previously.

25 Q And the first event you went to was called a TurnON

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1 event; is that correct?

2 A Yes.

3 Q And then you went to a coaching program; is that right?

4 A Yes.

5 Q And you learned more about the practice of orgasmic
6 meditation at those programs; correct?

7 A Yes.

8 Q And, so, it's fair to say that you signed up for OneTaste
9 knowing about the practice of orgasmic meditation; right?

10 A Yes.

11 Q Now I want to talk about a few things you said on your
12 direct testimony today.

13 So, you testified today you were trained in sacred
14 prostitution at OneTaste; is that right?

15 A I was trained to be a sacred prostitute.

16 Q And you said that that deviated from your principles; is
17 that correct?

18 A It was a very slow process of deviation and I ended up
19 finding that I had deviated very, very far from my principles
20 and values, yes.

21 Q So, in 2011, though, you said something different than
22 that; right?

23 A I have no idea what you're referencing.

24 Q Did you participate in a podcast with Mygu (ph) in
25 December of 2011?

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1347

1 A Yes, I -- I did participate in a podcast with Mygu (ph).

2 Q And in that podcast you discussed prostitution; correct?

3 A Yes, that was the topic of conversation.

4 Q And in discussing your work as a prostitute you said, "It
5 was one of my favorite jobs ever. I loved having sex and I
6 got paid to have sex with -- this might sound a little weird,
7 with random men and it's very exciting."

8 Did you say that?

9 A I -- I don't have a memory of the specifics of what I
10 said in that interview and I do remember saying something
11 along those lines that really just, I think, shows how far I
12 had deviated.

13 Q The question is whether you said it, yes or no?

14 A I don't have memory of the specifics of that
15 conversation.

16 Q Can I show you a document to see if it refreshes your
17 recollection?

18 A Sure.

19 MR. ROBOTTI: Your Honor, may I approach?

20 THE COURT: Yes.

21 (Counsel approaches.)

22 MR. ROBOTTI: I'm showing what's Defense Exhibit
23 2-BI.

24 BY MR. ROBOTTI:

25 Q I direct your attention, Ms. Gill to page three and at

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1 the time stamp 7:28. If you can take a moment to review that
2 paragraph.

3 A (Reviewing.)

4 Do you want me to read it out loud or just in my
5 head?

6 Q No, just in your head.

7 A Okay. (Reviewing.)

8 Q So does that refresh your recollection about whether you
9 said that at this time?

10 A I have no memory of saying these specific words.

11 Q Okay. Does it refresh your recollection as to whether
12 you said: There's an edge to there, to that, that's really
13 thrilling and to be honest the majority of my clients if they
14 paid for an hour, we were talking for 45 minutes and having
15 sex for fifteen. They just had no clue how to interact with
16 women and they were so desperate to actually have intimacy.
17 And that's what ended up happening. They just wanted to talk
18 and connect and feel seen and touched and loved.

19 Did you say that?

20 MS. GUPTA: Objection.

21 THE COURT: Basis?

22 MS. GUPTA: Hearsay.

23 THE COURT: Overruled. He's asking if she remembers
24 saying that.

25 A I do not remember saying these specific words.

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1 Q All right. Let's direct your attention to page eight.

2 Before I get to that, you said on your direct
3 testimony that you were open at OneTaste about being a sex
4 worker; is that correct?

5 A Yes.

6 Q And that's not what you said during this podcast; is that
7 correct?

8 A I have no recollection of the specific words I said
9 during this podcast.

10 Q All right. Can you take a look at timestamp 23:49 and
11 just read that paragraph to yourself?

12 A (Reviewing.)

13 Q And does that refresh your recollection when referring to
14 your time at OneTaste, you said: Part of the controversy was
15 I had to keep it hush-hush to most people until I finally
16 quit?

17 A Again, I don't have the memory of these specific words.
18 Only the general context.

19 Q Okay. And you also said earlier in your direct testimony
20 that you were a prostitute to help pay for courses at
21 OneTaste; is that right?

22 A Yes.

23 Q And you also said something different about that in this
24 podcast; is that right?

25 A I don't know.

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1 Q Okay. Taking a look at that paragraph there, does it
2 refresh your recollection that you said: I quit because I got
3 so advanced in the meditation practice it's basically what got
4 me to end up quitting because I didn't feel like I needed it
5 anymore, either monetarily or for the sexual wakening that I
6 was using it for, so to speak, the sexual growing up.
7 Orgasmic meditation was filling that for me.

8 Do you remember saying that?

9 A I do not.

10 Q You also said that you signed up for a sugar daddy
11 website because your finances were so bad; is that right?

12 A I did agree to sign up for Sugardaddy, yes.

13 Q But in 2011 you said something different about why you
14 signed up; is that right?

15 A I don't recall.

16 Q Can we turn to page nine and have you read the timestamp
17 for 25:35, the paragraph under that?

18 A (Reviewing.)

19 Q And does that refresh your recollection that at the time
20 you made a deliberate decision to become a prostitute; is that
21 correct?

22 A Can you repeat that question? I'm sorry.

23 Q At the time you said: I don't know what happened but
24 there was a six-month period. It was in the back of my brain,
25 like, hey you should try it. You might actually get something

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1 out of it. So I went on a sugar daddy website and I got
2 myself a sugar daddy.

3 Did you say that?

4 A I don't recall.

5 MR. ROBOTTI: Your Honor, I believe we would like to
6 play just for the witness a couple of clips at this point and
7 seek to introduce those.

8 THE COURT: Is it what the paper copy corresponds
9 to?

10 MR. ROBOTTI: Yes, Your Honor.

11 THE COURT: Which ones are you seeking to play?

12 MR. ROBOTTI: It will DX 2-BC-7 from 7:41 to 8:21.

13 THE COURT: Sorry, where is that?

14 MR. ROBOTTI: That should be on the drive that we
15 handed up to you, Your Honor.

16 THE COURT: Okay. But where does it correspond on
17 2-D-1.

18 MR. ROBOTTI: That would be on page three and the
19 timestamp there is 7:28.

20 THE COURT: And what's the next one?

21 MR. ROBOTTI: The next one would be page eight and
22 the timestamp is 23:49. And page nine, 25:35.

23 THE COURT: And you're asking just to have the
24 witness listen to it?

25 MS. GUPTA: Your Honor, I would note for the record

1 I didn't receive these or have the opportunity to listen to
2 them.

3 MR. ROBOTTI: We did provide them to the Government
4 earlier today.

5 MS. GUPTA: They were provided at 1:30, so it was
6 when we reconvened and I was questioning the witness and I
7 didn't have an opportunity to listen to it.

8 THE COURT: You're going to have to move along to
9 something else.

10 MR. ROBOTTI: I'll move along and come back to it.
11 Thank you, Judge.

12 BY MR. ROBOTTI:

13 Q Let's go over the reasons you stayed involved over a
14 five-year period. Is it fair to say that there were many
15 reasons you stayed involved?

16 A There were a few reasons I stayed involved, yes.

17 Q And one of the reasons you stayed involved was because
18 you loved the OM practice at the time; is that correct?

19 A I stayed involved because I found the exception --
20 acceptance, sorry, of my sexuality very liberating.

21 Q So you found the practice beneficial?

22 A At the time I found the practice beneficial, yes.

23 Q And you thought it helped other people; correct?

24 A I think that I believed that it helped other people at
25 that time, yes.

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1 Q And you believed that yourself, as you said earlier on
2 direct examination, you called yourself the Mother Teresa of
3 Orgasm; is that right?

4 A Yes.

5 Q And you believed that you could help free people from
6 their bondage mostly around sex; is that correct?

7 A Freeing people from their bondage around sexuality in the
8 way that I had been bound definitely appealed to me and was
9 one of the things that I really began to believe, yes.

10 Q And that was your view as of January 2013; right?

11 A I don't recall.

12 Q Did you write that you believed that you were helping to
13 free people from their bondage mostly around sex in January of
14 2013?

15 A I don't know what you're referencing.

16 MR. ROBOTTI: Could we pull up just for the witness
17 Defense Exhibit 2-W?

18 (Exhibit published to witness only.)

19 MR. ROBOTTI: Your Honor, if I may approach I can
20 give the witness a copy.

21 THE COURT: Sure.

22 And the Government has it?

23 MS. GUPTA: Yes, Your Honor.

24 (Counsel approaches.)

25 BY MR. ROBOTTI:

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1 Q So directing your attention to page 24 and if you read
2 the first five or six lines there.

3 A (Reviewing.)

4 Q Does that refresh your recollection that at the time in
5 January 2013 your view was you could help free people from
6 their bondage mostly around sex?

7 A I'm trying to think of my words. Give me a moment.

8 Q Of course.

9 A You know, I -- I think -- I feel like this is written in
10 my journal and it points to the -- it points more to the
11 manipulation than to what my true beliefs were. I was
12 parroting.

13 Q So, you kept a private journal in January 2013?

14 A I did.

15 Q And did you or did you not write this in January of 2013?

16 A I haven't looked through the whole thing so I don't know
17 which date this particular bit is.

18 Q Well, if you flip back to page 22, you can see it's
19 written on January 24, 2013.

20 A Thank you.

21 I don't recall the exact dates that I wrote, but
22 I -- again, I think that it speaks to my ability to parrot
23 and -- the ways in which I was manipulated more than anything.

24 Q Ma'am, I understand that's your view today.

25 My question is whether you wrote that in January of

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1 2013, yes or no?

2 A It is in my journal for January 24, 2013.

3 Q And that's right before you left OneTaste; correct?

4 A Yes.

5 Q And during your time at OneTaste, you also posted to the
6 OM Hub; is that right?

7 A I don't even remember what the OM Hub is, sorry.

8 Q Do you recall the OM Hub being an internal OneTaste
9 social media site?

10 A I do not have any recollection of the OM Hub.

11 Q So you don't recall posing on that site about your
12 beneficial views on the OM practice?

13 A No.

14 Q Is it fair to say that you OM'd regularly when you were
15 at OneTaste?

16 A Yes.

17 Q Sometimes multiple times per day?

18 A Yes.

19 Q With several Oming partners?

20 A Yes.

21 Q And as of January of 2013, again the very end of your
22 time there, you believe you had moved and grown a lot over
23 your time at OneTaste; is that fair?

24 A I had grown a lot the entire time I was at OneTaste.

25 Q Throughout your time at OneTaste, you told Rachel how

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1 helpful the practice had been for you; right?

2 A There were a lot of wonderful and helpful things about
3 the practice, yes.

4 Q And specifically you told Rachel about that, right?

5 A I would imagine so.

6 Q Right.

7 MR. ROBOTTI: And can we show just for the witness
8 Defense Exhibit 2-AC?

9 (Exhibit published to witness only.)

10 MR. ROBOTTI: Can we zoom into the header at the top
11 paragraph there?

12 BY MR. ROBOTTI:

13 Q Looking at what's on your screen, do you recognize this
14 to be an e-mail from you to Robert Kandell and at that time
15 Rachel Cherwitz?

16 A That is my e-mail address. I don't remember sending this
17 e-mail specifically.

18 Q But do you recognize that as your e-mail address?

19 A I do.

20 Q And the date there is March 12, 2012?

21 A Yes.

22 MR. ROBOTTI: Your Honor, the defense seeks to admit
23 Defense Exhibit 2-AC.

24 THE COURT: Any objection?

25 MS. GUPTA: Can I have a moment, Your Honor?

1 THE COURT: Yes.

2 MS. GUPTA: I'm just looking it over.

3 (Pause in proceedings.)

4 MS. GUPTA: Your Honor, I would object on relevance
5 grounds.

6 THE COURT: Sustained.

7 BY MR. ROBOTTI:

8 Q Let me direct your attention to the second page.

9 MR. ROBOTTI: Can we pull up the second page of
10 Defense Exhibit 2-AC?

11 Q And just looking at that last paragraph there --

12 THE COURT: Do you have a hard copy?

13 THE WITNESS: I do not. Not that I know of.

14 THE COURT: Do you have a hard copy? It's easier
15 than looking at blurbs at a time.

16 (Counsel approaches.)

17 THE COURT: And it's a bit lengthy so let's take a
18 moment to look at it.

19 A (Reviewing.)

20 Q Now, is that something you wrote attached to the e-mail?

21 A I don't have any recollection of writing this.

22 Q The document is attached to the e-mail you sent though?

23 A I don't know.

24 Q And do you recognize this as telling Ms. Cherwitz about
25 the benefits of the orgasmic meditation practice?

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1 A It does appear to be that way.

2 MR. ROBOTTI: Your Honor, the defense seeks to admit
3 Defense Exhibit 2-AC.

4 MS. GUPTA: Objection, relevance.

5 THE COURT: Sustained.

6 BY MR. ROBOTTI:

7 Q All right. You were friendly with Ms. Cherwitz; correct?

8 A Yes.

9 Q And you shared experiences that you normally practiced?

10 A Yes.

11 Q And you shared fear inventories with Rachel; correct?

12 A Yes.

13 Q And that's a practice borrowed from the twelve-step
14 programs; correct?

15 A I -- I was not aware of that.

16 Q The idea is to name and confront your fears; right?

17 A It's to -- from my understanding it was to uncover the
18 fears, yes.

19 Q So to name them and uncover them and help conquer them;
20 right?

21 A I don't know that I would ever say to help conquer them,
22 but to name them and discover them.

23 Q Now, at the time you believe those fear inventories
24 helped you; right?

25 A At the time, yes, I did believe those fear inventories

1 helped.

2 Q And you asked to share those inventories with Rachel;
3 correct?

4 A Yes.

5 Q So that's something that you asked her to do with you;
6 correct?

7 A I don't actually recall if I ever asked to do it. I do
8 know that I did feel more comfortable with her because I did
9 feel close with her.

10 Q Let me direct your attention to Defense Exhibit 2-BF.

11 MR. ROBOTTI: If we can show this to just the
12 witness.

13 (Exhibit published to witness only.)

14 THE COURT: So, my collection of documents only goes
15 up to 2-BE. Is there something else?

16 MR. ROBOTTI: Your Honor, we think this is in
17 evidence already in the Government's exhibits. So let us just
18 have a moment here.

19 THE COURT: But if you're referring to something as
20 2-BF I need to have that. If you want to use a different
21 version, you need to tell me what that is.

22 MR. ROBOTTI: We can hand up 2-BF because I think
23 we'll use it during the examination today.

24 THE COURT: Okay. Just make sure the Government has
25 it as well.

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1 (Counsel approaches.)

2 MR. ROBOTTI: Let's show the witness --

3 THE COURT: Get back to the microphone first.

4 MR. ROBOTTI: Let's show the witness what's been
5 marked or is in evidence as Government Exhibit 4518-A.

6 (Exhibit published.)

7 MR. ROBOTTI: Can I switch to the ELMO, Your Honor?

8 THE COURT: Yes.

9 BY MR. ROBOTTI:

10 Q Looking at page 27 of this document, do you see down here
11 at the bottom where you said, "Can I read my fear inventory to
12 you?"

13 A Yeah, that was the practice when -- to make sure she was
14 available because I had already been in the practice of
15 reading her my inventory regularly.

16 Q And turning to the next page, you see again at the top
17 where you ask, can I read my fear inventory to you?

18 A Yes.

19 Q These are two instances in which you asked Rachel to read
20 your fear inventory to her; correct?

21 A Yes. I apologize. I thought you were referring to the
22 first time ever that I asked.

23 Q Of course. Rachel also tried to mentor you in sales; is
24 that fair?

25 A I would have never called her in my mentor in the same

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1 capacity as some of the other staff were, but I did try to do
2 sales for a little bit.

3 Q And you said on direct examination you weren't that good
4 at sales; right?

5 A Yeah, I don't like selling things.

6 Q But she did give you tips and try to help you out?

7 A I don't recall.

8 Q And you and Rachel you bonded over the fact that you had
9 moved into 1080 under tough circumstances; is that fair?

10 A She was there for me in a very vulnerable moment.

11 Q And fair to say you sometimes told each other that you
12 loved each other; right?

13 A Yeah, that was a pretty common practice.

14 Q And you also loved your life when you were at OneTaste;
15 is that right?

16 A There were parts of it that I loved, yes.

17 Q And that's something you said in January 2012; right?

18 A I don't recall.

19 Q And up until January 2013, you also felt you loved your
20 life, right?

21 A There were parts of my life that I loved. There were
22 parts that were very liberating, yes.

23 Q And just to turn your attention to what's in front of you
24 as Defense Exhibit 2-W at page 18, do you recall that in
25 January 2013 you said, "Damn, aside from the Robert thing,

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1 life is fucking good"?

2 A I don't recall saying that, but --

3 Q And looking at that document does that refresh your
4 recollection that that's something that you wrote?

5 A It doesn't.

6 Q All right. So sitting here today do you recall that at
7 that time, about a month before you left, you felt that your
8 life was good?

9 A I do not remember that, no.

10 Q All right. Let's talk about the Robert thing. I would
11 like to show you Defense Exhibit 2-AJ. This is for
12 identification.

13 (Exhibit published to witness only.)

14 BY MR. ROBOTTI:

15 Q Do you recognize this photograph?

16 A I recognize the person in the photograph.

17 Q And who is it?

18 A Rob Bakhshai.

19 MR. ROBOTTI: Defense seeks to admit Defense Exhibit
20 2-AJ.

21 THE COURT: Any objection?

22 MS. GUPTA: No objection.

23 THE COURT: Defense Exhibit 2-AJ is admitted.

24 (Defense Exhibit 2-AJ received in evidence.)

25 THE COURT: Do you want to publish it?

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1 MR. ROBOTTI: Yes, Your Honor.

2 (Exhibit published.)

3 BY MR. ROBOTTI:

4 Q All right. So, this is Robert Bakhshai, who was your
5 boyfriend for a time; correct?

6 A Yes.

7 Q In 2012 you met him; correct?

8 A I don't remember when I met him but that seems about
9 right.

10 Q And not long after you met him you fell in love with him,
11 right?

12 A Yes.

13 Q You wanted to be together with him?

14 A I did.

15 Q And he was another reason you stayed at OneTaste; right?

16 A I don't think so.

17 Q Robert was at OneTaste while you were there; correct?

18 A Yes.

19 Q And you wanted to continue to interact with him?

20 A Yes.

21 Q And you met Robert in San Francisco; is that right?

22 A Yes.

23 Q And then OneTaste transferred him to a job in Las Vegas?

24 A Yes.

25 Q And that was a good job opportunity for him; right?

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1 A I couldn't say.

2 Q Do you recall that he was asked to do the CP5 Mastery
3 program?

4 A I don't know, no.

5 Q Was it your understanding that he was moving to Las Vegas
6 to help set up OneTaste in that city?

7 A It's my understanding that he was going to OneTaste Las
8 Vegas to learn from Ken.

9 Q And that was an opportunity to learn from a master
10 stroker; right?

11 A Yes.

12 Q And you and Robert stayed connected during that
13 long-distance period you were in San Francisco and he was in
14 Las Vegas?

15 A Yes.

16 Q And at that time Aubrey Fuller told you not to be in a
17 relationship with Robert; right?

18 A I don't recall.

19 Q Do you recall being advised not to fall into your same
20 old patterns with men?

21 A In general; not from a specific person you mean?

22 Q From Ms. Fuller.

23 A I don't have a specific recollection of that
24 conversation.

25 Q Do you recall trying to take a year off from the

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1 relationship with anyone?

2 A I don't.

3 Q Do you recall trying to break this pattern, this cycle,
4 that you were having?

5 A I recall people telling me that I should break the
6 pattern and the cycle.

7 Q And even though you had decided to try to break a pattern
8 or you were trying to break a pattern, you continued to see
9 Robert; is that right?

10 A Yes.

11 Q And that's a decision you thought through with your
12 therapist; correct?

13 A It was something that I was wrestling with in therapy.

14 Q And at the time -- towards the end of your time at
15 OneTaste, you were seeing a therapist; right?

16 A I was.

17 Q That was a resource that you had?

18 A Yes.

19 Q And is it fair to say that your relationship with Robert
20 was strained because you didn't want to be monogamous at the
21 time?

22 A I was really fighting against the conditioning of
23 non-monogamy and everything that I had learned at OneTaste
24 with what I was feeling on the inside.

25 Q And at a certain point, Robert had asked you to be

1 monogamous; is that correct?

2 A Yes.

3 Q And that was something you were struggling with?

4 A I knew that I wanted to be monogamous, that I was
5 struggling with all of the outside voices telling me that I
6 could not do monogamy.

7 Q And at some point you and Robert discussed getting
8 married; is that right?

9 A No, not to my recollection.

10 Q Can you look at Defense Exhibit 2-W right in front of you
11 at page 41?

12 A (Reviewing.)

13 Q If you can take a moment to review that page.

14 Does that refresh your recollection that you and
15 Robert spoke about getting married?

16 A That was not what this conversation is referring to.

17 Q So you and Robert did not speak about getting married?

18 A It was -- we got into a fight about something and I can't
19 remember what he said and I ended up making an offhanded
20 comment of, like, then if you think that way then that means
21 that you would never want to get married in the future and
22 that's what this conversation is referencing.

23 Q Okay. So it's a discussion with Robert about getting
24 married; correct?

25 A I wouldn't -- I wouldn't call it a conversation about

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1 getting married.

2 Q Okay. At a certain point Robert broke up with you; is
3 that right?

4 A I don't recall that.

5 Q On February 13, 2023, he broke up with you?

6 A I don't recall that.

7 Q Do you recall he broke up with you because you made out
8 with Paul without telling him?

9 A I don't recall breaking up with him because of that.

10 Q Or he broke up with you?

11 A I don't recall breaking up period because of that. We
12 still continued seeing each other afterwards.

13 Q Can you look at page 53 of Defense Exhibit 2-W?

14 THE COURT: What is the question, Mr. Robotti?

15 BY MR. ROBOTTI:

16 Q So Mr. Bakhshai broke up with you; is that right?

17 A No.

18 Q At some point did you two break up, or no?

19 A We broke up after we had left OneTaste.

20 Q At this point in time in February of 2013, you and
21 Mr. Bakhshai were fighting about the fact that you wanted to
22 be nonmonogamous?

23 A No, we were in a fight because I had made out with Paul.

24 Q And ultimately you ended up in a fight and taking some
25 time apart; is that correct?

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1 A Not to my recollection, no.

2 Q At this time you were blaming OneTaste for the strain on
3 your relationship with Robert; is that right?

4 A I was starting to pick up on a lot of the manipulation,
5 what I interpreted to be manipulation.

6 Q And Robert made the decision to move to Las Vegas; right?

7 A He did.

8 Q That was a job that he was offered; correct?

9 A Yes.

10 Q That was an adult decision for him to move to Las Vegas?

11 A I think that he was a part of that decisionmaking process
12 and he had incomplete information.

13 Q And he prioritized the relationship with OneTaste over
14 the relationship with you at the time; is that fair?

15 A I think it was a both and not an either/or.

16 Q All right. So is it fair to say that people at OneTaste
17 worked long hours sometimes?

18 A Yes.

19 Q And there was a time period as you said that you worked
20 in sales with Rachel; is that correct?

21 A A very short time, yes.

22 Q And then you later worked at Yia Vang's apprentice?

23 A I don't remember if it was before or after, but I did
24 both of those things, yes.

25 Q And you also did chores around 1080; is that fair?

Gill - Cross - Robotti

1369

1 A I cooked in the kitchen. Is that what -- is that what
2 you mean by chores?

3 Q The people around 1080 did chores; right?

4 A We had a housekeeper, to my memory, at least. I helped
5 cook dinner as, like, payment in kind for rent, I think.

6 Q And you also took classes at OneTaste; is that correct?

7 A Yes.

8 Q And you also had other jobs outside of OneTaste; right?

9 A At various times, yes.

10 Q You worked at a restaurant; correct?

11 A For a brief period, yes.

12 Q You worked at a cafe; right?

13 A I worked -- are you talking about SoMa Inn Cafe? Is that
14 the one --

15 Q That's correct.

16 A Yes.

17 Q You were interested in seminary school at the time;
18 right?

19 A I became interested in seminary probably around 2013 when
20 I was leaving.

21 Q And so before you left OneTaste; correct?

22 A I don't believe so.

23 Q And you went to church on a regular basis while at
24 OneTaste?

25 A Only in the last year of my time there.

Gill - Cross - Robotti

1370

1 Q So, fair to say, you were balancing multiple different
2 responsibilities; is that right?

3 A Yeah.

4 Q Now, Rachel can be a tough boss when you worked for her?

5 A Yes.

6 Q Fair to say she can be direct?

7 A Yes.

8 Q She can be a little harsh sometimes?

9 A Uh-huh.

10 Q It can be a good relationship or a bad relationship
11 sometimes?

12 A Yes.

13 Q And she can be direct with you on text message; right?

14 A Yes.

15 Q And we looked a couple of minutes ago at Government
16 Exhibit 4518-A; is that correct?

17 A I'm sorry, I'm going to need a refresher.

18 MR. ROBOTTI: All right. Let me show this on the
19 ELMO here.

20 Q This is a series of text messages that Rachel sent you
21 via text; correct?

22 A Yes.

23 Q And this is in September of 2012; right?

24 A If I'm remembering correctly, those were the dates but I
25 don't --

Gill - Cross - Robotti

1371

1 THE COURT: Can you give her the full hard copy,
2 please?

3 MR. ROBOTTI: Of course.

4 (Counsel approaches.)

5 THE COURT: Thank you.

6 BY MR. ROBOTTI:

7 Q Now, do you recall that at this time in September of
8 2012, Rachel was locked out; is that right?

9 A Again, I don't recall why she was needing the garage
10 clicker.

11 Q She was needing the garage clicker to gain access to the
12 building; correct?

13 A Russ Street, yes.

14 Q And later in this exhibit you reviewed some text messages
15 related to Ken Blackman; is that right?

16 A Yes.

17 Q And at this point in this text conversation, you said not
18 once but twice, Do you want me to do something; correct?

19 A Yes.

20 Q So that was you asking Ms. Cherwitz if you could do
21 something; correct?

22 A I was trying to clarify why she was asking about Ken.

23 Q And in response to her question about Ken, you offered to
24 do something; correct?

25 A It was more of a reading into the text than an offer, I

Gill - Cross - Robotti

1372

1 would say.

2 Q So at two different points you did say, do you want me to
3 do something; correct?

4 A Yes. I was trying to respond to her text message and
5 figure out what she wanted.

6 Q And is it accurate to say that you never worked for
7 OneTaste?

8 A I wouldn't say that. I never got paid from OneTaste.

9 Q You were never on the OneTaste payroll; is that correct?

10 A Correct.

11 Q And when people at OneTaste did ask you to do things
12 though, you were comfortable saying no; is that correct?

13 A No.

14 Q But you did, in fact, say no to people quite a bit;
15 right?

16 A I don't recall. It always depended on the circumstance.

17 Q There were times that you had to work at one of your
18 other jobs; correct?

19 A Yes.

20 Q And that happened pretty regularly, right?

21 A It depends on the time of year this is in of my life at
22 OneTaste.

23 Q And at a certain point when you were trying out the sales
24 team, you decided you didn't want to do that anymore; right?

25 A I realized that I was not very good at it.

Gill - Cross - Robotti

1373

1 Q And so you decided I don't want to do this anymore and
2 you asked to not do it; correct?

3 A I don't recall. I don't recall how I got out of sales.

4 Q You ultimately did leave the sales role; correct?

5 A Yes.

6 Q And the other role that you had was Yia Vang's
7 apprentice; right?

8 A That was one of the roles, right.

9 Q And Yia Vang worked with Nicole; right?

10 A Yes.

11 Q So that was a pretty high-level job; correct?

12 A Yes.

13 Q And there were also times when you signed up for coaching
14 programs; correct?

15 A Yes.

16 Q And there were times when you couldn't attend the
17 coaching classes because you had to work; correct?

18 A If memory serves me, there was one of the coaching
19 programs that I had to miss for work. I remember missing one
20 portion of it. I don't know if it was the whole day or not.

21 Q So there were times that you signed up for coaching
22 programs and you didn't go; correct?

23 A I only have memory of missing one.

24 Q And there were times where there were events where you
25 could not go because of work; right?

Gill - Cross - Robotti

1374

1 A I don't recall.

2 Q And do you recall that there were mandatory meetings at
3 1080 sometimes?

4 A I don't recall there being mandatory meetings.

5 MR. ROBOTTI: Can we show for the witness Defense
6 Exhibit 2-AP.

7 (Exhibit published to witness only.)

8 MR. ROBOTTI: If we can zoom in there.

9 BY MR. ROBOTTI:

10 Q Does that refresh your recollection that there were
11 mandatory meetings at 1080?

12 A I can see that the subject says "Mandatory Meeting," but
13 it does not refresh my memory of it.

14 Q Does that refresh your recollection about an e-mail
15 between you and Rob Kandell on that date, July 8, 2012?

16 A No.

17 Q So you don't recall despite it being your e-mail that
18 there was a mandatory meeting that day?

19 A Uh-uh.

20 Q You don't recall telling Robert Kandell, who was high
21 level in the company that you could not attend a mandatory
22 meeting; right?

23 A No. I don't have memory of this specific e-mail, no.

24 Q And Mr. Kandell was a pretty important person at
25 OneTaste; correct?

Gill - Cross - Robotti

1375

1 A Yes.

2 Q And nonetheless, you felt that you were able to reject
3 mandatory meetings with him; is that correct?

4 A I don't -- I think that I didn't think twice about
5 whether or not a job that was bringing in income would be an
6 issue for meetings, but, again, I don't have -- that's just an
7 assumption of what might have -- I might have been thinking.

8 Q So at this time in July of 2012, you got a new job; is
9 that right?

10 A I don't -- I think -- I think that's when it was. That
11 would make sense in my mind's timeline.

12 Q And you were working Monday through Friday; right?

13 A Thirty hours a week, yes.

14 Q And so you had this other job that was taking time away
15 from OneTaste; is that right?

16 A Yes.

17 Q And you indicated to Mr. Kandell that because you had
18 this other job that you were not going to be able to spend as
19 much time at OneTaste; is that right?

20 A I don't recall that, no.

21 Q At least over the next month or two until your time got
22 more flexible; is that correct?

23 A That's what the e-mail says.

24 Q And you said that you would be there in thought, but you
25 wouldn't actually be there; correct?

Gill - Cross - Robotti

1376

1 A That's what the e-mail says. Again, I don't have any
2 recollection of this e-mail.

3 Q Okay. So at this time you were able to tell the
4 co-founder of the company that you were not coming to certain
5 meetings?

6 A Yeah.

7 Q And at this time you were living at 1080; right?

8 A I don't believe so.

9 Q In July of 2012?

10 A I was not living at 1080, no.

11 Q Where were you living?

12 A I was living with my boyfriend Mick because I was
13 pregnant.

14 Q So there was a time period where you were able to leave
15 1080 and move in with your boyfriend; right?

16 A Uh-huh.

17 Q So you had somewhere else to stay besides 1080, right?

18 A For that brief period, yes.

19 Q During that brief period of time he was not involved in
20 OneTaste; is that correct?

21 A He had a meeting with Rachel and -- I think he learned
22 how to OM, but I don't remember. He knew about OneTaste --
23 sorry, he knew about OneTaste.

24 Q But he was not a regular participant?

25 A I don't believe so, no.

Gill - Cross - Robotti

1377

1 Q And during the time that you lived at 1080 you were free
2 to come and go as you pleased; right?

3 A Yeah.

4 Q You had your own key; right?

5 A Yes.

6 Q The other residents were free to come and go as they
7 pleased; correct?

8 A Yes.

9 Q And people not associated with OneTaste are free to come
10 and visit?

11 A Some of them. There were restrictions.

12 Q So, in fact, at 1080 you could have guests stay up to
13 eight days at the residence?

14 A I don't recall the lengths of time that you could have
15 guests.

16 Q And your parents came to visit you at 1080; correct?

17 A They came once for a meeting with Rob and Rachel.

18 Q And you also had friends stay with you at 1080; right?

19 A I remember one friend staying with me there, yes.

20 Q So in May 2010 you had a friend named Hector come and
21 visit you?

22 A I don't remember when it was, but Hector did come and
23 stay with me, yes.

24 Q In April 2010, you had a friend named Javi come, right,
25 and visit you, right?

Gill - Cross - Robotti

1378

1 A I do have a friend named Javi. I don't remember him
2 staying with us.

3 Q And you had a personal phone when you were at 1080;
4 correct?

5 A I did.

6 Q And you used that phone to call or text anyone?

7 A Yes.

8 Q You had a personal computer?

9 A Yes.

10 Q You had access to the internet e-mail; correct?

11 A Yes.

12 Q 1080 had a free WiFi?

13 A I paid for it with my rent.

14 Q And as part of your rent you did work trade; correct?

15 A For parts of it, yes.

16 Q So that's a process where you worked were OneTaste and
17 that money goes towards your rent; correct?

18 A Yes.

19 Q And that's what you meant on direct examination of
20 payment in kind; right?

21 A So some of the -- some of the payment in kind was for
22 caravan retreats and rent and some of the payment in kind was
23 for coursework.

24 Q And from 1080 you could go to your job, you could go to
25 church, right?

Gill - Cross - Robotti

1379

1 A Yes.

2 Q In fact, you invited the residents of 1080 to come to one
3 of your talks that you gave at the church; right?

4 A For one talk.

5 Q On sexuality; right?

6 A Yes.

7 Q And many of them went; right?

8 A Yeah.

9 Q Now, residents were not told that they had to stay at
10 1080 to stay turned on; is that correct?

11 A It was never phrased that way. At least for -- and I
12 can't speak for other people. I can only speak for myself and
13 what was told to me. It was -- the way that it was languaged
14 (sic) was if you're anywhere else you will lose all of the
15 orgasm that you've cultivated and all of the power that you've
16 been working so hard to achieve.

17 Q And, in fact, there was a time when Rachel thought that
18 you were telling people that they would not stay turned on if
19 they left, do you recall that?

20 A There was -- I remember getting in trouble, getting
21 yelled at by Rachel for talking to someone who was there
22 visiting from the Austin community and what I said was
23 misinterpreted and we ended up clearing things up.

24 Q And at that time Rachel said to you people can always
25 come and go. Do you remember that?

Gill - Cross - Robotti

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1 A I don't recall that specific comment.

2 Q Would it refresh your recollection if we looked at
3 Defense Exhibit 2-BF, which is in front of you, page 28?

4 A Is 2-BF on the transcript because that's 2-B1. Where is
5 2-BF?

6 Q It's the messages in front of you.

7 A On the screen, not the hard copy.

8 THE COURT: Please hand her a hard copy. It's a
9 lengthy document.

10 (Counsel approaches.)

11 BY MR. ROBOTTI:

12 Q And does that refresh your recollection that Rachel told
13 you people can always come and go from 1080?

14 A Yes.

15 Q Now you posted quite a bit on social media while you were
16 at OneTaste; is that right?

17 A I certainly posted more than I do now.

18 Q So that was the years of about 2009 to 2013; is that
19 correct?

20 A Yes.

21 Q And that included posts about your work; right?

22 A I have not perused my Facebook in a while. I don't
23 recall what I posted.

24 Q Do you recall posing about your travels?

25 A I'm sure I did. I would always post, hey, going and

Gill - Cross - Robotti

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1 doing this.

2 Q And you would post about OneTaste; correct?

3 A I believe so.

4 Q And activities outside of OneTaste; right?

5 A Yeah.

6 Q And on direct you said that Rachel encouraged you to post
7 on social media; is that right?

8 A Yeah.

9 Q And you've been meeting with the Government since May of
10 2021 in this case; right?

11 A I don't remember the specific dates but that sounds about
12 right.

13 Q That's about four years; correct?

14 A Four years ago?

15 Q Between May of 2021 and now it's been about four years?

16 A Yeah.

17 Q So you've had more than a dozen meetings with the
18 Government in that time period; right?

19 A I have not counted how many times I've met.

20 Q How many times would you say you've met?

21 A I said it earlier I'm horrible with counting beans in a
22 jar. I don't know, ten, twelve?

23 Q So during those ten or twelve meetings you met with the
24 Government, it wasn't until last week that you mentioned that
25 Rachel asked you to post on social media?

Gill - Cross - Robotti

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1 A Yeah. It wasn't a subject that had come up in our
2 conversations.

3 Q So, that was the first time you ever said that; right?

4 A Yes.

5 Q And that was because the Government confronted you with
6 your posts produced by the defense; correct?

7 MS. BENSING: Objection.

8 THE COURT: Sustained.

9 BY MR. ROBOTTI:

10 Q Did the Government show you posts that you made of
11 different activities outside of OneTaste?

12 A Yes.

13 Q And you needed to explain why it was that you had all of
14 those posts; correct?

15 MS. GUPTA: Objection.

16 THE COURT: Sustained.

17 BY MR. ROBOTTI:

18 Q Is it fair to say that at that time the Government asked
19 you whether Rachel encouraged you to post on social media?

20 MS. GUPTA: Objection.

21 THE COURT: Overruled.

22 A No. I believe I brought it up, if I'm remembering
23 correctly. I don't remember what triggered me to say it, what
24 reminded me.

25 Q And that was in response to a bunch of documents that you

Gill - Cross - Robotti

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1 were shown by the Government; right?

2 A Yes.

3 Q Your posts; correct?

4 A Yes.

5 Q And you're not denying that you did the activities you
6 posted about; right?

7 A No.

8 Q Now, on direct you testified that leaving 1080 was not
9 really an option for you; right?

10 A It didn't feel like an option.

11 Q You said that you had nowhere else to go?

12 A At the time it felt like I had nowhere else to go.

13 Q But you actually went to all sorts of different places
14 while you were living at 1080; right?

15 A Can you ask that a different way?

16 Q Sure. So, for example, you went to visit your cousin in
17 Chico; right?

18 A I -- my cousin did live in Chico. I don't -- and I
19 remember visiting her at various points in my life. I don't
20 have a specific memory of visiting her in Chico during that
21 period of time.

22 Q You went to baseball games. You went to the beach?

23 A I went to baseball games with OneTaste people.

24 Q And also to the beach?

25 A With OneTaste people, yes.

Gill - Cross - Robotti

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1 Q You went to cafes and restaurants?

2 A Absolutely.

3 Q You went to remote islands with no internet access; is
4 that correct?

5 A I went out to Santa Cruz Island National Park, yes.

6 Q And you went to Disneyland; right?

7 A I do not remember that one.

8 Q Let's talk about a couple of specific trips here. So
9 August 11, 2010 you went to Chico; is that fair?

10 A I don't recall.

11 MR. ROBOTTI: Could we pull up Defense Exhibit 2-B
12 just for the witness?

13 THE COURT: B as in boy?

14 MR. ROBOTTI: B as in boy.

15 (Exhibit published to witness only.)

16 BY MR. ROBOTTI:

17 Q Does that refresh your recollection that on August 11,
18 2011 you went to Chico?

19 A I don't recall going to Chico. I don't have a memory of
20 it. I know that I had gone to go see my cousin, but I have no
21 recollection of when it was in my timeline.

22 Q And do you recall posting on Facebook about going to
23 Chico?

24 A No.

25 Q Do you have any reason to doubt the accuracy of your

Gill - Cross - Robotti

1385

1 post?

2 A No.

3 Q It's fair to say that you went to Chico on August 11,
4 2010?

5 A It would appear so, yes.

6 Q May 11, 2011 you went to a baseball game; is that right?

7 A Would you refresh my memory.

8 MR. ROBOTTI: Would you pull up Defense Exhibit 2-C.

9 A I do remember going to that game.

10 Q So that was May 11, 2011?

11 A I don't -- that's what the date says, yes.

12 Q On October 6, 2011 you told people at 1080 you were going
13 on vacation; right?

14 A Can you refresh my memory, please?

15 Q Sure.

16 MR. ROBOTTI: Defense Exhibit 2 H.

17 (Exhibit published.)

18

19 (Continued on the following page.)

20

21

22

23

24

25

GILL - CROSS - MR. ROBOTTI

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1 (Continuing.)

2 BY MR. ROBOTTI:

3 Q On that date, you told people at 1080 that you would be
4 going on vacation, correct?

5 A I didn't read that. Again, I don't have a recollection
6 of this email, and I do remember going on this vacation.

7 Q So this was a camping trip to a remote island, correct?

8 A Yes.

9 Q And you'd be going with little internet access, right?

10 A Yes.

11 Q And that was with non-OneTaste people, correct?

12 A It was with my family.

13 Q So you went away with your family in October 2011,
14 correct?

15 A Yes.

16 Q And at that point you could have left and never come
17 back to OneTaste if you wanted, right?

18 A I could have.

19 Q December -- sorry, January 14, 2012, you went to the
20 beach, right?

21 A Can you refresh my memory, please?

22 Q Sure.

23 MR. ROBOTTI: Defendant's Exhibit 2-I.

24 A That's the island. This is the remote island with
25 little internet access.

GILL - CROSS - MR. ROBOTTI

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1 Q And so you went to the beach on that day?

2 A I -- I don't know if the dates are accurate on this one
3 because there was so little internet out there. It may have
4 been posted after I got back.

5 Q But around that time period, right?

6 A I would imagine so, but I don't --

7 Q And February 29, 2012, you went to meet your cousin's
8 baby in Chico; is that correct?

9 A I don't remember that.

10 MR. ROBOTTI: Let me show Defense Exhibit 2-K.

11 A Oh, that was not Chico. That's West Sacramento.

12 Q So you went to West Sacramento to meet your cousin's
13 baby, correct?

14 A Uh-huh.

15 Q And in March 22, 2012, you went back to your alma
16 mater, right?

17 A Can you refresh my memory, please?

18 Q Sure.

19 MR. ROBOTTI: Defense Exhibit 2-L.

20 Q So this is you on a beach again, correct?

21 A Yes. I was going down to see my sister, I think. I
22 don't remember why I was -- it's Santa Barbara.

23 Q So this is your old college, UC Santa Barbara?

24 A Yes. I was going down to visit my sister who lived
25 there and was also going to school there.

GILL - CROSS - MR. ROBOTTI

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1 Q All right. So that Disney trip, May 2012 --

2 A You're really going to have to refresh my memory for
3 that one.

4 MR. ROBOTTI: Defense Exhibit 2-N.

5 THE COURT: Just say the letter again.

6 MR. ROBOTTI: 2-N.

7 THE COURT: N.

8 Q Do you recognize this photograph?

9 A I do.

10 Q Do you see yourself in there?

11 A I do.

12 Q And do you recognize the other people in the
13 photograph?

14 A I do.

15 Q And this is May 2012?

16 A Uh-huh.

17 MR. ROBOTTI: Your Honor, the defense offers
18 Defendant's Exhibit 2-N into evidence.

19 THE COURT: Any objection?

20 MS. GUPTA: No objection.

21 THE COURT: Defense Exhibit 2-N is admitted.

22 (Defense Exhibit 2-N received in evidence.)

23 (Exhibit published.)

24 Q So here you are visiting Disneyland, right?

25 A Yes.

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1 Q And your boyfriend at the time is in this photograph,
2 correct?

3 A Yes.

4 Q And is he the one in the dark shirt behind you to the
5 right?

6 A My left looking at the picture, but when I'm in the
7 picture, on my right.

8 Q You can actually mark on the screen, so --

9 A Oh, can I touch it?

10 Q You can. So if you would like to mark and identify
11 him.

12 A Oh, look at that, there he is. That's him.

13 MR. ROBOTTI: The witness has identified the man
14 in sunglasses in the middle of the photograph.

15 Q As we talked about before, you lived with him for a
16 little while, correct?

17 A Yeah. I don't remember exactly how long.

18 Q In fact, you had almost left 1080 in 2011 and moved in
19 with him, right?

20 A I -- I have no idea what you're referencing because I
21 definitely did move in with him and out of 1080. I don't
22 remember exactly when. It was before I got pregnant.

23 Q Do you recall discussing on that podcast moving in with
24 him in the near future?

25 A I -- no.

GILL - CROSS - MR. ROBOTTI

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1 Q But ultimately you did move in with him, correct?

2 A Yes.

3 Q And Disneyland is in Anaheim, right?

4 A Yes.

5 Q And that's about seven hours from San Francisco where
6 you were living, right?

7 A Yes.

8 Q And you were able to do that? You were able to leave
9 1080 with non-OneTaste people and go to Disneyland, right?

10 A I was not living at 1080. I was living with my
11 boyfriend at the time.

12 Q You were still participating in OneTaste at the time,
13 right?

14 A I was.

15 Q So you were both living with your boyfriend and travel
16 tog Disneyland at that time, right?

17 A Yes.

18 Q Now, on other occasions, such as the 4th of July, you
19 went and visited your parents, right?

20 A Would you please refresh my memory?

21 Q Sure.

22 MR. ROBOTTI: Can we show Defense Exhibit 2-AQ.

23 THE COURT: Maybe a hard copy is better. It's
24 very small print.

25 THE WITNESS: How do I get rid of the arrow on the

GILL - CROSS - MR. ROBOTTI

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1 screen?

2 THE COURT: Mr. D'Agostino, can you clear the
3 arrow off the display?

4 Thank you.

5 Q Does that refresh your recollection that you visited
6 your family for 4th of July?

7 A No.

8 Q So looking at your email saying that you're going to
9 visit your family doesn't refresh your recollection?

10 A It does not refresh my recollection.

11 Q Do you recall ever visiting your family's house on the
12 4th of July?

13 A Ever?

14 Q During your time at OneTaste.

15 A I -- I have no memory of it, no.

16 Q Now, when you went on all these trips, you were able to
17 come back to 1080, right?

18 A Uh-huh.

19 Q No one kicked you out?

20 A Right.

21 Q Nobody said you're outside of OneTaste forever, you
22 can't come back?

23 A No, I never heard those words.

24 Q And you made the choice to come back, right?

25 A Yes.

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1 Q Each time you left, you made a choice to come back and
2 keep associating with OneTaste, right?

3 A Yes.

4 Q All right. So let's talk about some of the things you
5 told the Government.

6 THE COURT: Let me just stop you for one minute,
7 Mr. Robotti, to let you know that in the next ten to
8 15 minutes I'd like to take a break. But you tell me when
9 that's convenient.

10 MR. ROBOTTI: This is the perfect time, Your
11 Honor.

12 THE COURT: Okay. We will take a break until a
13 quarter after 3:00.

14 The witness can step down.

15 (Witness leaves the stand.)

16 THE COURT: If the jury could just come back to
17 the jury room at 10 after 3:00 so we can really start at a
18 quarter after 3:00, I would appreciate it.

19 Thank you.

20 (Jury exits.)

21 THE COURT: I'll see you at 3:15.

22 (Court is in recess.)

23 (In open court; jury not present.)

24 THE COURT: Okay. We can bring back the witness
25 and the jury.

PROCEEDINGS

1393

1 MR. ROBOTTI: Judge, just one tech issue. Give a
2 second.

3 THE COURT: Tech issue, did you say?

4 MR. ROBOTTI: Technology.

5 THE COURT: Oh, I might be the wrong person to ask
6 about that. But okay, go ahead.

7 MR. ROBOTTI: So we handed up some clips we
8 prepared on the fly in response to the testimony today.
9 They were a little off. I believe the Court has the full --

10 THE COURT: The 2-V-1?

11 MR. ROBOTTI: So this would be --

12 THE COURT: One that corresponds to that, I mean?

13 MR. ROBOTTI: Defendant's Exhibit 2-BC is the full
14 video from the podcast. What we'd like to do is just play
15 the relevant timestamps for the witness, and then we can
16 clip them after the fact. I just wanted to make sure the
17 Court has that available to --

18 THE COURT: I asked whatever you gave me during
19 the lunch break, so those were the clips. You're telling me
20 those are not accurate exactly now, or they just don't align
21 to the paper?

22 MR. ROBOTTI: They don't align perfectly. It's a
23 little bit cut off in one of the clips at the front, so we
24 just wanted to make sure -- I believe the Court should have
25 this exhibit already, the full Defense Exhibit 2-VC.

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1 THE COURT: The full video.

2 MR. ROBOTTI: The full video, yes. So you should
3 be able to just click the timestamps that we're going to be
4 playing, but I just wanted to make sure the Court had that
5 ready, so we flagged it for you.

6 THE COURT: And you want me to do this while the
7 witness is on the stand?

8 MR. ROBOTTI: If Your Honor has already listened
9 to them, you may not need to.

10 THE COURT: Okay. But what are you going to be
11 doing with the witness? You're going to be asking the
12 witness to listen to it?

13 MR. ROBOTTI: To listen to it, Your Honor.

14 THE COURT: Okay.

15 MR. ROBOTTI: We can also just direct you to the
16 portions of the transcript.

17 THE COURT: Yes, the transcript is very helpful.
18 Thank you for that.

19 MR. ROBOTTI: We'll do that.

20 THE COURT: Okay.

21 MS. COHEN: Your Honor, I'm sorry, one other
22 question.

23 Mr. Robotti offered 2-AC, which was objected to on
24 relevancy grounds. It was an email with an attachment of a
25 story. I just want to make sure the record is clear that it

PROCEEDINGS

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1 was effect on the listener because --

2 THE COURT: There was not a sufficient foundation.
3 This is the one where there was one line and on the back
4 there was something else?

5 MS. COHEN: Yes.

6 THE COURT: Yes. There was not a sufficient
7 foundation laid for that document.

8 MS. COHEN: Okay.

9 MS. BONJEAN: It wasn't on relevance grounds?

10 THE COURT: There was not a sufficient foundation
11 laid. There may be other grounds to exclude it, but there
12 may also be grounds to admit it. But the witness's answer
13 was essentially that she didn't know about that second page
14 and -- well, you can go back and look at the transcript.

15 MS. COHEN: You got it. I just wanted to make
16 sure it was clear with our --

17 THE COURT: Yes.

18 MS. COHEN: Yes, okay. Thank you.

19 THE COURT: How much of those clips are you going
20 to play for her? Because one was seven minutes, I think,
21 one was five, one was a couple seconds. I mean, the jury is
22 just sitting there watching someone --

23 MR. ROBOTTI: We've narrowed them down, Your
24 Honor.

25 THE COURT: Okay.

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1 MR. ROBOTTI: It's going to be about three minutes
2 total. Three clips, about a minute each.

3 THE COURT: Fine.

4 Okay. Let's bring back the witness and the jury.

5 (Witness resumes the stand.)

6 (Jury enters.)

7 THE COURT: Everyone may be seated.

8 Mr. Robotti, you may continue your examination.

9 MR. ROBOTTI: Thank you, Judge.

10 BY MR. ROBOTTI:

11 Q So, Ms. Gill, before the break we looked at some
12 documents about a podcast.

13 Do you recall that?

14 A You mean at the beginning of my cross?

15 Q Exactly. So that would be Defense Exhibit 2-BI was the
16 one you had in front of you.

17 A (Witness indicating.)

18 Q Correct.

19 What I'd like to do now is play for you some
20 portions of Defense Exhibit 2-BC.

21 MR. ROBOTTI: Your Honor, if I may approach the
22 witness with a laptop?

23 THE COURT: Yes.

24 MR. ROBOTTI: Your Honor, for the first clip, I'm
25 going to ask the witness to listen to 7:08 to 8:20.

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1 THE COURT: Thank you.

2 THE WITNESS: Do I hit "play"?

3 MR. ROBOTTI: Yes.

4 And this corresponds to page 3, Your Honor.

5 THE COURT: Yes. Thank you.

6 (Audio is played for witness only.)

7 MR. ROBOTTI: When you hit 8:20, you can hit stop.

8 THE WITNESS: You said 8:20?

9 MR. ROBOTTI: 8:20.

10 THE WITNESS: Thank you.

11 Q Now, ma'am, did you recognize your voice in that clip?

12 A I did recognize my voice.

13 Q And you recognize that as the podcast interview that
14 you did in 2011?

15 A Yes.

16 Q And did that refresh your recollection about the
17 statements you made then?

18 A It -- it --

19 That was way louder than I thought it was going to
20 be.

21 It did not. Again, I do remember the general
22 aspect of this conversation, but it didn't trigger any overt
23 and specific conversations.

24 Q Ma'am, that's a recording of your voice, correct?

25 A It is.

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1398

1 Q And you're not disputing that you made those
2 statements?

3 A I am not disputing that that's my voice, and I have no
4 memory of this particular -- those particular words coming
5 out of my mouth.

6 Q You agree, though, that you did, in fact, make those
7 statements in 2011, right?

8 A Yeah, I -- yeah, I would imagine so, yeah.

9 Q The recording of your voice, you agree that you made
10 those statements, correct?

11 A I -- I -- I agree that that is my voice on that.

12 MR. ROBOTTI: Your Honor, at this point the
13 defense moves to admit this portion of Defense Exhibit 2-BC.

14 THE COURT: Any objection?

15 MS. GUPTA: Your Honor, objection. Improper
16 impeachment.

17 THE COURT: Sustained.

18 Q Did that refresh your recollection that you stated
19 during that podcast that:

20 Prostitution was one of my favorite jobs ever. I
21 loved having sex and I got paid to have sex.

22 A No, I don't -- I don't have a recollection of saying
23 those specific words.

24 MR. ROBOTTI: Your Honor, at this point we'd like
25 to play 23:49 to 24:43.

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1 THE COURT: 23:49 to what?

2 MR. ROBOTTI: 24:43, Your Honor.

3 THE COURT: Okay.

4 (Audio is played for witness only.)

5 Q Now, Ms. Gill, do you recall saying on your direct
6 examination that you could be open about the fact that you
7 were a prostitute at OneTaste?

8 A Yes.

9 Q Okay. And did you just listen to that clip there?

10 A I did.

11 Q Did you recognize that as your voice?

12 A I did.

13 Q Did you recognize it as the podcast you gave in 2011?

14 A Yes.

15 Q And in that podcast, you stated:

16 Part of the controversy, I had to keep it
17 hush-hush to most people until I finally quit.

18 Do you recall saying that?

19 A I don't.

20 MS. GUPTA: Objection.

21 THE COURT: Overruled.

22 Q And do you recall during your direct examination that
23 you stated that you needed money from prostitution to pay
24 for the coaching program?

25 A Yes.

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1400

1 Q Okay. And in this audio that you just listened to, do
2 you recall saying:

3 I quit because I got so advanced in the meditation
4 practice. That's basically what got me to end up quitting,
5 because I didn't feel like I needed any more either
6 monetarily or for that sexual awakening that I was using it
7 for, so to speak.

8 A I -- I -- again, I recognize my voice, and I do not
9 recall saying those specific words.

10 Q Again, you don't dispute it's your voice, right?

11 A Correct.

12 MR. ROBOTTI: At this point, the defense moves to
13 admit Defense Exhibit DX 2-BC from 23:49 to 24:43.

14 MS. GUPTA: Objection. Improper impeachment.

15 THE COURT: Sustained.

16 You can ask other questions on this passage,
17 however.

18 Q Do you recall saying that you --

19 At the time that you were at OneTaste, it is true
20 that you quit prostitution because you got so advanced in
21 the meditation practice; is that correct?

22 A I do not recall saying that.

23 Q And this does not refresh your recollection that that
24 happened?

25 A It does not.

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1401

1 Q And does this refresh your recollection that you, in
2 fact, kept it hush-hush from people while you were at
3 OneTaste that you were a prostitute?

4 A It does not. I -- can I expand a little bit more?

5 Q Sure.

6 A I -- I do remember being open about me -- about
7 prostitution and sex work. I also remember core staff
8 saying that we had to be quiet about it because they didn't
9 want it getting out. So there were some people that it had
10 to be hush-hush with and others that I was in close
11 relationship with that I did not have to be hush-hush about
12 it with.

13 Q Okay. So that's different than what you said on direct
14 examination, right?

15 A It -- not in my mind.

16 Q Well, on direct examination, you said that you could be
17 open about it, right?

18 A I do feel like I could be open -- or I still feel like
19 I was able to be open, as open as I wanted to be.

20 Q But you also had to be hush-hush at least for certain
21 people, correct?

22 A Yes.

23 Q That's not something you said on direct, right?

24 A No.

25 Q That's not something you said until I played your own

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1402

1 voice for you, right?

2 A It -- it didn't come up.

3 Q And it's true that orgasmic meditation was fulfilling
4 for you, what you had been seeking with prostitution, right,
5 in terms of the sexual awakening?

6 A Can you say that again, please?

7 Q So orgasmic meditation was fulfilling for you in a way
8 that you no longer needed prostitution; is that right?

9 A I -- I -- I don't believe so.

10 Q So do you recall explaining that at the time of 2011,
11 you found orgasmic meditation beneficial such that you no
12 longer needed to engage in prostitution?

13 A That's -- that's not my memory of it, because I was
14 seeing someone up until -- I remember having a going away
15 party, and I was seeing one of the johns, and he actually
16 came to OneTaste and he was still paying me. So that is not
17 my memory.

18 Q Okay. Even though that's what you said at the time?

19 A I don't recall saying that at the time.

20 Q Again, ma'am, there's no dispute that that's your voice
21 on that audiotape, right?

22 A Yes.

23 Q So you did, in fact, say that at the time, right?
24 Whether you recall it or not.

25 A Sure.

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1403

1 Q I'd like to play one final clip for you and then we can
2 move on.

3 MR. ROBOTTI: Your Honor, this is going to be
4 25:35 to 26:31, for the record.

5 THE COURT: Thank you.

6 (Audio is played for the witness only.)

7 MR. ROBOTTI: Your Honor, this is page 9 of the
8 transcript.

9 THE COURT: Yes, I have it. Thank you.

10 A You said 26:31?

11 Q That's correct.

12 So again, ma'am, do you recognize your voice?

13 A I do recognize my voice.

14 Q Is that the podcast from 2011?

15 A Yes.

16 Q And again, no dispute that that's your voice and you
17 said these words?

18 A Correct.

19 Q Okay. And did that refresh your recollection that you
20 took a six-month period to think about whether or not you
21 were going to sign up to the Sugardaddy website?

22 A It does not.

23 Q Sitting here today, do you recall that you spent six
24 months thinking about whether or not to do this?

25 A No.

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1404

1 Q And that's different from your direct testimony that
2 you had to do this because you needed the money, right?

3 A My recollection of it was that I -- I did with -- what
4 are the words that I'm trying to say? I did resist when it
5 was first brought up to me, and I did say no, no, that's far
6 outside of my values. I don't remember the length of time
7 that that was. And then it got to the point, and I believe
8 I said this in my direct, it got to the point where it felt
9 like that was no longer an option and I needed money.

10 Q That latter part's not what you said during your direct
11 examination, right?

12 A No, that was what I was intending to say.

13 Q And, in fact, at the time in 2011 you didn't say that
14 either, right?

15 A I did not hear it on that recording.

16 Q And 2011, you said that you took a six-month period:

17 It was at the back of my brain like, hey, you
18 should try it, you might actually get something out of it.
19 And so I went on to a Sugardaddy website and I got myself a
20 Sugardaddy.

21 That's what you said in 2011, right?

22 A That is what I heard, yes.

23 MR. ROBOTTI: Your Honor, at this time the defense
24 moves to admit Defense Exhibit 2-BC, 25:35 to 26:31.

25 MS. GUPTA: Objection. Improper impeachment.

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1405

1 THE COURT: Sustained.

2 Q Let's go back to some other words you said in 2013.

3 So I'd like to look at -- again, this is Defense
4 Exhibit 2-W, the journal in front of you, and if you could
5 look at page 62. When we spoke before the break, you said
6 that you and Robert did not break up, right?

7 A I -- I don't recall breaking up. We -- we would
8 occasionally, like, get into these fights where he would say
9 we're done, and it was never a true breakup.

10 Q Okay. Well, that's not what you said a few minutes ago
11 before the break, right?

12 A We -- we never -- until I left for the East Coast, we
13 never broke up for good.

14 Q And so why don't we look at page 62. Just take a
15 moment and read the bottom portion of this.

16 (Pause in proceedings.)

17 Q And can you also turn to page 53, a few pages back, and
18 if you can read the middle portion of that page.

19 (Pause in proceedings.)

20 Q Now, do these passages refresh your recollection that
21 in February of 2013, Robert said to you he wants to break
22 up?

23 A No. I -- well, he -- so he may have said he wanted to
24 break up, but he didn't trust me, and then we didn't.

25 Q So does this refresh your recollection that in

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1406

1 February 13, 2013, you said:

2 So we made out and Robert is pissed, wants to
3 break up, feels like he can't trust me.

4 A Yes, I did say that.

5 Q You did write that, right?

6 A Yes.

7 Q In your private journal?

8 A Yes. Wanting to break up is very different from
9 actually breaking up.

10 Q Okay. Well, you did not mention that on your testimony
11 earlier today, did you?

12 A No.

13 Q All right. So I'd like to talk about some things.

14 And you can set that aside for a moment, ma'am.

15 I'd like to talk about some things you told the
16 Government.

17 So do you recall telling the Government on
18 February 9, 2023 that leaving OneTaste was extremely
19 difficult. It felt like it was an impossible place to go
20 back to your parents.

21 Do you recall saying that?

22 A Not those specific words, but the sentiment, yes.

23 Q And you said something similar during your testimony
24 today, right?

25 A Uh-huh.

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1407

1 Q You said you had nowhere else to live?

2 A There were times where it felt like there was nowhere
3 else for me to go.

4 Q But this isn't a true statement, right?

5 A Can you say that a different way?

6 Q Well, you had other options, correct?

7 A There were times when other options presented
8 themselves to me and I took them.

9 Q So the answer is yes, you had other options, correct?

10 A At times, yes.

11 Q So it was not impossible to go back to your parents'
12 house, for instance, right?

13 A It felt impossible to go back to live with my parents.

14 Q But you did go back to your parents' house quite a bit,
15 right?

16 A I visited --

17 Q You visited --

18 A -- on occasion.

19 Q You visited --

20 A It was still a very strained relationship.

21 Q So you visited your family while you were living at
22 OneTaste, right?

23 A On occasion, yes.

24 Q You went and stayed with them, correct?

25 A I don't remember if I ever stayed the night or not.

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1408

1 That I can't -- aside from going to the island and staying
2 the night.

3 Q Right. Because you don't remember going to see them on
4 the 4th of July in 2012, right?

5 A Not a specific memory of it, no.

6 Q Despite the document that was shown to you today,
7 right?

8 A I'm sorry, I don't have memory of it.

9 Q Okay. And so this was always an option for you, right,
10 to leave 1080 and go to your parents?

11 A It didn't feel that way.

12 Q You always had the option, when you went to see your
13 parents, not to come back to 1080, right?

14 A I'm sorry, can you say that again?

15 Q You always had the option, when you went to visit your
16 family, not to come back to 1080, right?

17 A It didn't feel that way.

18 Q But in reality, that was true, right?

19 A There were no chains on me.

20 Q There were no chains on you, correct?

21 A Correct.

22 Q And you went freely back and forth.

23 Where do your parents live again?

24 A Sacramento.

25 Q And how far away is that from San Francisco?

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1409

1 A About two hours.

2 Q So two hours away was your family, right? Yes?

3 A Yes, sorry, yes.

4 Q Who you saw regularly?

5 A I would not say regularly, no. It was a very strained
6 relationship.

7 Q But on multiple occasions, right?

8 A Yes.

9 Q It's fair to say that most people in their mid 20s
10 don't want to move back in with their parents, right?

11 A I think it depends on the person.

12 Q What about you?

13 A I certainly did not want to move back in with my
14 parents. I didn't feel accepted by them.

15 Q But there's a difference between want and could not,
16 correct?

17 A I think that's a complicated answer. It's not a very
18 clear-cut answer. It's nuanced.

19 Q Fair to say you did not want to move back in with your
20 parents?

21 A No, I did not.

22 Q You also told the Government on February 9, 2023 that
23 you did not have anything and you feared homelessness and
24 joblessness if you left OneTaste.

25 Do you recall saying that?

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1410

1 A Not those specific words, but the general sentiment,
2 yes.

3 Q Homelessness and joblessness, right?

4 A Again, not the specific words, and I do remember the
5 sentiment.

6 Q But you did say those words to the Government or no?

7 A I don't recall.

8 Q Would it help if I showed you a document to refresh
9 your recollection?

10 A Maybe.

11 MR. ROBOTTI: Could we look at 3500-DG-5, at page
12 2. And this is just for the witness.

13 And if we could blow up the third paragraph. I'm
14 sorry, also the fourth paragraph.

15 A I don't recall saying those words.

16 Q Is the document in front of you wrong?

17 A I -- my understanding is the notes that were taken were
18 a summary of what I said and not necessarily a dictation.

19 Q Is that what the Government told you to say?

20 A No.

21 Q So you don't remember making those statements?

22 A Again, I remember expressing those sentiments of fear
23 and isolation that I was limited in my options.

24 Q And you said something similar today, that you would
25 lose everything and that you had no support network, right?

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1411

1 A Yes.

2 Q And you're hesitant to admit the words "homelessness"
3 and "joblessness" because that's kind of a ludicrous claim,
4 right?

5 A No. I just want to be accurate with the words, and I
6 don't recall saying those specific words.

7 Q Right. And you had multiple other jobs while living at
8 1080; is that correct?

9 A At various times, yes.

10 Q How many jobs? Three? Four?

11 A It depends on the time period. But you want the total
12 number of jobs throughout my entire time there?

13 Q Sure.

14 A Maybe three.

15 Q And --

16 A Except -- with the exception of what I consider jobs
17 for OneTaste. But, like, paying jobs.

18 Q So these were paying jobs that you had outside
19 OneTaste, at restaurants and at the church, correct?

20 A Uh-huh.

21 Q And you say people outside of OneTaste all the time,
22 correct, at work?

23 A I -- yeah, when I -- I was working at the church for
24 about a year.

25 Q And in the church, you had a broad community outside of

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1412

1 OneTaste, right?

2 A Uh-huh.

3 Q And you ultimately ended up devoting your life to the
4 church, correct?

5 A I did.

6 Q So when you said a couple hours ago that you had no
7 support network, that's what you said on direct, right?
8 That wasn't true.

9 A There were time yes it felt like I had no support
10 network, and getting involved in church provided me with the
11 outlet to allow me to leave because I had enough support
12 finally in my life.

13 Q So you had a broad support network at church, correct?

14 A I had a support network. I started to accrue one.

15 Q And you had friends outside of OneTaste, correct?

16 A I lost a lot of friends during my tenure at OneTaste.

17 Q Well, 2012 we just saw you go to Disneyland with your
18 friends, right?

19 A Those were -- those were my boyfriend at the time's
20 friends, not -- so I was there with him.

21 Q Okay. And at that time you also lived with your
22 boyfriend, right?

23 A Uh-huh.

24 Q So there were other options for you, right?

25 A Staying at his house was not an option.

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1413

1 Q Not the whole time you were there, but certainly for a
2 time it was, right?

3 A Sure.

4 Q And you had other friends and you had the church,
5 right?

6 A Most of my friends that were not involved in OneTaste
7 stopped talking to me. The few that did not, we had limited
8 contact.

9 Q And you had your sister who lived nearby, too?

10 A She was not nearby. I wouldn't consider it nearby.

11 Q Where did she live?

12 A Santa Barbara.

13 Q And how far away is that?

14 A I want to say it's, like, a seven-hour drive.

15 Q It's the same distance as Disneyland, right?

16 A No, it's closer than Disneyland.

17 Q Okay. So it's a trip you could make, right, by car?

18 A Yeah. I don't remember how I got there.

19 Q And you also went to visit your cousin, correct?

20 A Yes.

21 Q So there were other options. There were a lot of other
22 options, right?

23 A Those did not feel like options. My sister and I
24 didn't talk for over a year because she was so upset about
25 my involvement in OneTaste, and she's one of my best

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1414

1 friends.

2 Q And if you had called her up and said, I'm leaving
3 OneTaste, can you take me in, she would have said no?

4 A I don't know. It didn't feel like an option.

5 Q So it didn't feel like an option, but in reality, you
6 had these options?

7 A I -- I didn't -- I don't think so.

8 Q You also had resources, right?

9 A Can you say that a different way? What kind of
10 resources?

11 Q Well, when you originally signed up for OneTaste, isn't
12 it true that your parents gave you money to put towards the
13 course?

14 A No.

15 Q No, that's not what you told the Government?

16 A I don't believe so.

17 Q Originally you got \$10,000 to put towards the course?

18 A From my parents? No.

19 Q That's another inaccuracy?

20 A I have no idea what you're referencing --

21 MS. GUPTA: Objection.

22 THE COURT: Sustained.

23 MR. ROBOTTI: Can we pull up 3500-DG-4, at page 2.
24 When we get there, can we blow up the top paragraph.

25 Q Ma'am, can you take a moment to review that, please?

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1415

1 A So I did ask my parents for money, and they declined.
2 So if it were me writing this, I would have put a comma
3 after the course because I did pay approximately \$10,000.
4 It was not from my parents.

5 Q So your parents did have money, though, correct?

6 A They were not generous with their money with me.

7 Q But you felt that you could ask them for money,
8 correct?

9 A I thought it was worth a shot.

10 Q And if you were in a pinch or in trouble, you could go
11 back and ask them again, right?

12 A I could certainly ask them again, yes.

13 Q So it's not to say that you had no resources, right?

14 A I had no resources.

15 Q You had the option to go back and ask your parents.
16 True?

17 A Asking is very different from getting.

18 Q Now, ma'am, you've lied to the United States Government
19 before?

20 A I have.

21 Q You entered into a sham marriage; is that correct?

22 A I married an undocumented citizen -- or an immigrant
23 for his green card.

24 Q So that was to help an individual get a green card to
25 stay in the United States; is that correct?

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1416

1 A Yes.

2 Q And this is someone you met working at the SoMa Inn
3 Cafe, right?

4 A Yes.

5 Q And you were friendly with a coworker and her
6 boyfriend, correct?

7 A I mean, we only talked at work.

8 Q So not even someone you knew that well?

9 A Correct.

10 Q And nonetheless, you lied to the United States
11 Government for that?

12 A In -- you're talking about in my testimony when we were
13 being interviewed?

14 Q I mean, you tell me. When did you lie?

15 A I was very worried that we didn't have wedding ringing,
16 and I thought that it would look weird, and I absolutely
17 lied about wedding rings in our interview.

18 Q So this coworker's boyfriend was from Turkmenistan; is
19 that right?

20 A Uh-huh.

21 Q And the coworker asked you to marry her boyfriend, his
22 name was Seid Seidov; is that correct?

23 A Yes.

24 Q This was in 2010, right?

25 A I believe so.

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1417

1 Q And this was your coworker's and Seid's idea, right?

2 A I -- I don't know who the idea generated with. I have
3 no idea. We didn't talk about that.

4 Q Well, did you go to them and say, hey, I'm willing to
5 enter a sham marriage for you?

6 A No, they approached me.

7 Q They approached you. And they offered you \$10,000,
8 right?

9 A Seid did.

10 Q And you made the choice to enter into this sham
11 marriage, correct?

12 A I did.

13 Q And this was not OneTaste who made you do this, right?

14 A No, I -- no, it was not OneTaste.

15 Q This was a choice you made that you're personally
16 responsible for, correct?

17 A May I elaborate a little bit?

18 Q Go ahead.

19 A You know, that's one of those hard things where, you
20 know, yes, I did make that choice, and I also was in debt to
21 OneTaste for coursework and I didn't know how else to pay
22 for it. And I -- I had heard so many stories -- three
23 stories of people who had married other people -- within
24 OneTaste -- for green cards, and it normalized it for me.

25 Q Well, ma'am, people go into debt all the time, right?

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1418

1 A Yeah.

2 Q And people who go into debt don't have to break the law
3 to get out of it, right?

4 A No.

5 Q And you had another job, right?

6 A Yes.

7 Q You had another job -- you had multiple other jobs?

8 A I think I only held one outside job at a time, with
9 perhaps a little bit of overlap between SoMa Inn Cafe and
10 the church.

11 Q So this was a choice you made to pay off your debt by
12 committing a crime, right?

13 A Yes.

14 Q And you take personal responsibility for that, right?

15 A Yeah.

16 Q And it wasn't just showing up to the interview, right?
17 This was a whole elaborate scheme, correct?

18 A Uh-huh.

19 Q So you met with him a couple of times a month to get to
20 know him, right?

21 A I don't -- I don't remember how many times we got
22 together on a regular basis. I don't recall.

23 Q More than once?

24 A Yeah, yeah, absolutely.

25 Q And this was --

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1419

1 The idea behind this was so you could prepare for
2 the meeting with immigration officials, right?

3 A Uh-huh. Get to know each other, have a legitimate
4 friendship relationship.

5 Q And the reason you needed to do that, right, was so you
6 could answer the immigration official's questions, correct?

7 A Uh-huh.

8 Q That's yes?

9 A Yes, sorry, yeah.

10 Q And you needed to know the details about Seid so you
11 could make it seem like you were in a legitimate marriage,
12 right?

13 A Yes.

14 Q And did you go to meetings with his lawyer, too?

15 A Yeah. We all met up, the three of us.

16 Q During those conversations, you lied there as well,
17 right?

18 A Yes.

19 Q Now, you also posted photos of you and Seid on
20 Facebook, correct?

21 A Uh-huh.

22 Q Yes?

23 A Yes. Sorry, I'm so sorry. Yes.

24 Q You just need to verbalize "yes" for the court
25 reporter.

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1420

1 A I know, I know, I'm so sorry.

2 Q And in 2011, that's when you posted a number of these
3 photos, right?

4 A I -- I believe so.

5 Q You called him family in the photos, right?

6 A Yeah.

7 Q Posted about dates you were going on?

8 A Uh-huh, family dates, family fun dates with him and his
9 niece.

10 Q And this was to create a whole false record, right?

11 A Yes.

12 Q In case the immigration officials started looking into
13 the background, right?

14 A Uh-huh -- yes.

15 Q You wanted there to be false documents on the internet
16 to back you up, correct?

17 A Yes.

18 Q You even asked your friend, Aubrey Fuller, to write an
19 email vouching for your relationship, right?

20 A Yes.

21 Q And she did write that email, right?

22 A I believe so. I don't -- I don't recall fully, but I
23 believe so.

24 MR. ROBOTTI: Can we pull up Defense Exhibit 2-AT.

25 And if we could blow that up for the witness.

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1421

1 Q Now, ma'am, does that refresh your recollection that on
2 January 26, 2012, Aubrey Fuller wrote a false email for you,
3 right?

4 A I mean, I can see it right here. I still have no
5 memory of the specifics of the email, and I do recall that
6 she wrote a letter for me.

7 Q So you agree she did write a false letter for you?

8 A Yes.

9 Q This was somebody in OneTaste you asked to lie to back
10 you up, right?

11 A I -- I did ask her for a letter, yes.

12 Q And then you submitted this to the Government on behalf
13 of your application, right?

14 A Yes.

15 Q And so that's another lie to the Government, right?

16 A Yes.

17 Q And Aubrey went so far as to claim that she had
18 attended your wedding?

19 A She did.

20 Q And that you had met and really liked Seid and decided
21 to marry him, right?

22 A I did like him. He was a nice guy.

23 Q But you hadn't decided to marry him, right?

24 A I -- I -- yeah, I was still in the discernment process.

25 Q And Aubrey claimed that you two had moved in together,

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1422

1 which wasn't true?

2 A She didn't claim that we moved in together. She
3 claimed that I moved out, which is true.

4 Q She claimed that you moved out of our place not long
5 after you met him, right?

6 A Correct.

7 Q Implying that you had moved in together, right?

8 A Correct.

9 Q All right. So maybe that's not technically a lie,
10 right? But it's misleading.

11 A It is misleading.

12 Q And you and Seid then went to the interview with
13 immigration officials on November 2, 2011, correct?

14 A I don't recall the specific dates. That sounds about
15 right.

16 Q And you posted to Facebook before and after that
17 interview, correct?

18 A I did.

19 Q And again, during this interview you both lied to the
20 immigration officials, right?

21 A Yes.

22 Q Told the story of how you met, right?

23 A Uh-huh.

24 Q Correct?

25 A Yes. Sorry.

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1423

1 Q How you fell in love?

2 A Yes.

3 Q How you spent time together as a married couple?

4 A Yes.

5 Q And this was all false?

6 A Yes -- well, we tried to keep as much true as possible
7 because we did hang out, we did do stuff with his family, we
8 did go places. So that part was true. And the part about
9 it being a romantic relationship was absolutely false.

10 Q Okay. But even those true parts were told to the U.S.
11 Government officials in an effort to cover up a lie?

12 A To cover up the fact that it was not a romantic
13 relationship.

14 Q Correct. And you know it's a crime to lie to
15 government officials, correct?

16 A I do.

17 Q And just like you know it's a crime to lie under oath
18 today, correct?

19 A Correct.

20 Q It's a crime to enter into a sham marriage to get
21 someone a green card?

22 A Correct.

23 Q But you put together this elaborate plan to fool
24 immigration officials; is that right?

25 A I don't know that I would say I put together a very

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1424

1 elaborate plan. It was --

2 Q Well, posting to Facebook, creating a false record,
3 meeting with lawyers, going to an immigration official
4 meeting to tell a story, it seems pretty elaborate, right?

5 A Yeah. I mean, there were a lot of holes in it, but
6 yeah.

7 Q You did all of this to get \$10,000?

8 A Yes.

9 Q I'd like to turn back to your time at OneTaste. Okay?

10 A Yeah.

11 Q Now, we talked about earlier the fact that you did say
12 no to people at OneTaste sometimes, right?

13 A Uh-huh.

14 Q That's correct?

15 A Yes. Sorry.

16 Q And on the flip side of that, you also repeatedly told
17 OneTaste people that you wanted to be there, right?

18 A Can you say that a different way?

19 Q Did you repeatedly tell people at OneTaste that you
20 wanted to be there?

21 A I'm just trying to be very careful with my words. I
22 don't -- I mean, it wouldn't -- I -- I did enjoy being at
23 OneTaste.

24 Q So my question, ma'am, is: Did you tell people at
25 OneTaste that you wanted to be there?

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1425

1 A At times, yes.

2 Q Including Rachel Cherwitz?

3 A Yeah.

4 Q And Nicole Daedone?

5 A Yeah.

6 Q And while you were there, you volunteered to
7 participate in additional activities without being asked.

8 Fair to say?

9 A Uh-huh.

10 Q Yes?

11 A Yes. Sorry. I'm learning.

12 Q No, I just want to remind you to say yes so I don't
13 have to keep reminding you.

14 Particularly in your last seven or eight months
15 with the company, you volunteered a lot, right?

16 A I would say I volunteered the entire time; a lot.

17 Q But volunteered for specific tasks a lot in your last
18 seven, eight months?

19 A Again, I -- I don't think that there -- in my mind,
20 there's no difference between the last seven to eight months
21 and the entire time I was there for what I volunteered for.

22 Q Did you volunteer for specific tasks? Yes or no?

23 A Yes, I would imagine so. I don't have a recollection
24 of any specific tasks necessarily.

25 Q All right. Well, how about on April 22, 2012, you

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1426

1 reached out to Aubrey Fuller to ask for more responsibility
2 at OneTaste?

3 A Can you state the date again, please?

4 Q April 22, 2012.

5 A I mean, I don't -- I don't recall that conversation.

6 Q All right.

7 A Can you refresh my memory?

8 Q Sure.

9 MR. ROBOTTI: Let me pull up Defense Exhibit 2-BG.

10 THE WITNESS: Sorry, say that again.

11 MR. ROBOTTI: 2-B as in boy, G as in gopher.

12 Q Ma'am, does that refresh your recollection that on
13 April 22, 2012, you reached out to Ms. Fuller to ask for
14 more responsibility at OneTaste?

15 A I have a very vague recollection of this. But again,
16 no specific.

17 Q Does it refresh your recollection that you said:

18 I want to plug in and help out at OneTaste?

19 A That sounds like the language that I would use.

20 Q And did you -- on that date -- sorry. Withdrawn.

21 Does it refresh your recollection that you stated:

22 I've been missing being involved and the ops team
23 keeps popping up for me. I have my job, so I might not be
24 able to help out with every event, but I would love to be on
25 the team and help out as often as possible.

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1427

1 Did you say that?

2 A I -- I don't have a recollection of it.

3 Q So would you agree at this time, you were telling
4 people at OneTaste that you want to help out as often as
5 possible?

6 A That's what I -- yeah, that's what it sounds like from
7 the email.

8 Q Do you have any reason to believe that you did not
9 write those words at that time?

10 A No.

11 Q You recognize your email address, right?

12 A I do.

13 Q How about on April 28, 2012, do you recall telling
14 senior people at OneTaste that you wanted to join the PR
15 team?

16 A No. Could you refresh my memory?

17 Q Sure.

18 MR. ROBOTTI: I'll pull up Defense Exhibit 2-AX.

19 THE COURT: I think it's very hard to see on the
20 screen.

21 MR. ROBOTTI: I'm grabbing hard copies.

22 Q Now, ma'am, this is an email sent on April 28, 2012,
23 correct?

24 A That's what the date says, yes.

25 Q And this is from you to Justine Dawson, Rob Kandell,

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1428

1 Joanna van Vleck, and Raheli Cherwitz, also known as Rachel,
2 right?

3 A Yes, that's what it says.

4 Q And this is an email from you saying: I want to join
5 the PR team. Correct?

6 A That's what that says, yes.

7 MR. ROBOTTI: Your Honor, with redacting the two
8 bottom emails, the defense moves to admit this,
9 Exhibit 2-AX, for its effect on the listener.

10 THE COURT: Any objection?

11 MS. GUPTA: Objection. Hearsay.

12 THE COURT: Response?

13 MR. ROBOTTI: Sorry, Your Honor?

14 THE COURT: I wanted to know if you had a brief
15 response.

16 MR. ROBOTTI: Yes, Your Honor.

17 Not offered for the truth. Offered for the effect
18 on the listener. Goes to intent.

19 THE COURT: And you're just offering the top
20 portion, right?

21 MR. ROBOTTI: Just the top portion, Your Honor.
22 Intent and knowledge, Your Honor.

23 THE COURT: Sustained. But you can ask more
24 questions on this.

25 Q Now, ma'am, does this email refresh your recollection

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1 that in April of 2012, you said:

2 I want to join the PR team, exclamation point.

3 Do you remember that?

4 A I do not.

5 Q I recently went to Holistic Health Salon, got some
6 leads, and after having a few conversations and joining the
7 ops team, thought it would be a great way for me to plug in
8 more and further my coaching practice. What are your
9 thoughts and what do you need from me?

10 Do you remember saying that?

11 A I don't.

12 Q No reason to dispute that it's your words or your
13 email?

14 A No.

15 Q Is it, in fact, true that in April of 2012 you did want
16 to join the PR team?

17 A It's -- I don't remember that, and that's what it says
18 on here.

19 Q Sitting here today, do you have any reason to doubt
20 that that was your intent in April 2012?

21 A I mean, I have no reason to believe that my intent was
22 to try to reinvest into a community that I felt like I
23 belonged to.

24 Q These are your words, right? You wrote them?

25 A It appears that way. Again, I don't recall writing

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1430

1 them.

2 Q But no reason to doubt it, right?

3 A Correct.

4 Q Okay. So at this time period, you're telling the
5 senior leadership of OneTaste that you want to get more
6 involved, right?

7 A Uh-huh.

8 Q Correct?

9 A Sorry, yes.

10 Q And that's because --

11 THE COURT: Are you offering this at this time?

12 MR. ROBOTTI: Yes, Your Honor.

13 THE COURT: Any objection?

14 MS. GUPTA: No objection.

15 THE COURT: So Defense Exhibit 2-AX, just the top
16 email, is admitted.

17 Is there going to be a redacted version?

18 MR. ROBOTTI: Yes, Your Honor. Could we just
19 publish briefly to the jury?

20 THE COURT: Yes. The top email only.

21 MR. ROBOTTI: Yes.

22 (Defense Exhibit 2-AX received in evidence.)

23 (Exhibit published.)

24 Q Ma'am, I know you just went through this, but just for
25 the jury, can you please read this email?

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1431

1 A Out loud?

2 Q Yes, please.

3 A Okay.

4 Hi guys. I want to join the PR team. I recently
5 went to Holistic Health Saloon, got some leads, and after
6 having a few conversations and joining the ops team, thought
7 it would be a great way for me to plug in more and further
8 my coaching practice. What are your thoughts and what do
9 you need from me? Cheers, Dana.

10 Q Thank you.

11 (Continued on the following page.)

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1 (Cross-examination, cont'd)

2 BY MR. ROBOTTI:

3 Q Do you see the "on" underneath your name there?

4 A I do.

5 Q And what's on either side of that?

6 A I should know this, but I do not remember what they're
7 called.

8 Q I don't either.

9 A They are fancy parentheses.

10 Q Okay. So the fancy parentheses on other side. What did
11 you understand those to mean?

12 A That was a signature that was used among OneTaste,
13 specifically Rachel Cherwitz, from my recollection.

14 Q And is the meaning of that that you are turned on?

15 A Yes.

16 Q And so at this point, in April of 2012, you're telling
17 the senior leadership of OneTaste you are turned on, right?

18 A Well, so that --

19 Q Yes or no?

20 A That's a complicated answer. It is not a yes or no
21 answer.

22 Q Okay. Let me rephrase.

23 You included this signal in your e-mail that
24 indicates to the senior leadership of OneTaste that you are
25 turned on?

D. GILL - CROSS - ROBOTTI

1433

1 A It was a -- I had made it a part of my signature. So it
2 was an automatic part of whenever I replied to people.

3 Q So you are telling everyone that you are turned on at
4 this time?

5 A Yeah.

6 Q It's fair to say you were seeking to move up in the
7 company at this point?

8 A I never saw it as moving up. I was seeking belonging.

9 Q Getting more involved?

10 A Uh-huh.

11 Q Yes?

12 A Yes. I'm sorry.

13 Q All right. So on May 2, 2012, do you remember taking on
14 a new research project?

15 A I do not. No.

16 Q Okay.

17 MR. ROBOTTI: Can we pull up Defense Exhibit 2-AG.

18 Q And this one is very small.

19 All right. I drew a blue arrow next to ID number
20 10268.

21 Can you just review that post, and let me know when
22 you're done.

23 A I'm done.

24 Q All right. Now, does that refresh your recollection that
25 in May of 2012 you decided to take on a new research project,

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1 to OM four to five times a day, for at least the next 30 days?

2 A It does not.

3 Q Does it refresh your recollection that at that time you
4 believed OM helps fill me up on my orgasm and move through
5 what I'm dealing with hotter and quicker. So you'll be seeing
6 more posts from me about my research on the OM hub?

7 A Can you, without restating the words that I apparently
8 wrote, can you phrase -- say the question again, please.

9 Q Sure. Let me break it up.

10 Does this refresh your recollection that at the time
11 in May of 2012 you believed that OM helps fill me up on my
12 orgasm and move through what I'm dealing with hotter, quicker?

13 A I believe at that time I had been taught that that's the
14 way that we should be thinking about it. I was very good at
15 parroting.

16 Q Okay. Did you, in fact, undertake this research project?

17 A I don't even recall this research project, so I couldn't
18 say.

19 Q Okay. And did you, in fact, write this post on the OM
20 hub, which was visible to everyone at OneTaste?

21 A I don't recall. Again, I don't even recall the OM hub.

22 Q You don't recall posting multiple times to the OM hub
23 during your time there?

24 A I have no recollection of the OM hub.

25 Q Now, you had a bunkmate at 1080; is that right?

D. GILL - CROSS - ROBOTTI

1435

1 A I had two different bunkmates at 1080.

2 Q And one of them was Henry Debusmann, do you remember him?

3 A I do.

4 Q I think you spoke about him on direct a little bit?

5 A Maybe.

6 Q Was he in Doctors Without Borders?

7 A That's right. Yes. Thank you.

8 Q And he was your bunkmate, right?

9 A Yes.

10 Q And do you recall reaching out to him on June 10, 2012,
11 asking him to OM with you?

12 A No.

13 MR. ROBOTTI: All right. Could we pull up Defense
14 Exhibit 2-AY.

15 Q Does that refresh your recollection that on June 10, 2012
16 you reached to Henry Debusmann and asked him to OM with you?

17 A No. It does not refresh my recollection, and that is a
18 pretty standard request, as far as my practice was concerned.

19 Q So at this time in mid 2012, seven months or so before
20 you leave OneTaste, you are actively reaching out to people
21 and seeking to do additional OMs?

22 A Yes. I was still OMing up until I left.

23 Q And towards the end of that year, you continued to
24 volunteer for things. So do you remember volunteering to play
25 a desire game with your roommates on December 12, 2024?

D. GILL - CROSS - ROBOTTI

1436

1 A I do not. No.

2 MR. ROBOTTI: Can we pull up Defense Exhibit 2-BA.
3 Top two e-mails, please, to blow up.

4 A I have zero recollection of what the desire game was.

5 Q All right. Does this refresh your recollection that on
6 Christmas Eve 2012, Emily Peters-Limbeck asked you: Dear
7 Elves, is it possible to play the desire game remotely.

8 Do you remember that?

9 A No.

10 Q And do you recall responding: Yeah, I want to play
11 remotely, too?

12 A No.

13 Q And you're not a 1080, right, at this point?

14 A I don't remember.

15 Q Christmas Eve, you are home with your parents, right?

16 A I don't remember. That would make sense, but I don't --
17 I truly don't remember. The one thing that is coming to my
18 mind is they came into town one Christmas when I was dating
19 Mick.

20 Q So your parents --

21 A For Christmas.

22 Q So your parents visited you in December 2012?

23 A I don't remember if that's when they did it or not. I do
24 remember that they visited for Christmas Day because we went
25 to Luca Di Beppo.

D. GILL - CROSS - ROBOTTI

1437

1 Q Okay. But, either way, you're not at 1080 for the
2 holidays, right?

3 A Correct. I would imagine -- I don't know. I don't
4 remember.

5 Q All right. And a few days later, December 9, 2012, do
6 you recall organizing the women at 1080 to talk to the men at
7 1080 about their relationships?

8 A No.

9 Q All right.

10 MR. ROBOTTI: Can we pull up Defense Exhibit 2-AW.
11 Can we just blow that up for the witness.

12 Q Did you have a chance to review?

13 A Uh-huh.

14 Q All right. So does this refresh your recollection on
15 December 29, 2012, that you sent an e-mail to all of the
16 residents at 1080, women and men?

17 A January 29?

18 Q January 29. Apologies.

19 A I do not have a specific recollection of this. There's a
20 really vague memory of being involved in a men's course that
21 the women after the fact, when we were debriefing, realized
22 something. I can't remember what. I am assuming it was
23 whatever is listed in here. But I do not have a recollection
24 of it. But -- a very specific one. It is super fuzzy.

25 Q Do you recall that you sent this e-mail to relay some

D. GILL - CROSS - ROBOTTI

1438

1 thoughts the woman had after group discussion?

2 A I do not.

3 Q I think that's what you just said?

4 A I don't recall the e-mail. I recall the men's group and
5 feeling unsatisfied with how it went.

6 Q And in response to that, does this refresh your
7 recollection that you wanted a deeper, more connected sex with
8 the men?

9 A Who doesn't want deeper, more connected sex?

10 Q Is that a yes?

11 A I don't recall any of this --

12 Q Okay.

13 A -- specifically.

14 Q But is that how you felt at that time?

15 A I would not be surprised if that's how I felt at that
16 time. It sounds about right.

17 Q And, more particularly, you wanted more exquisite,
18 refined, and focused attention on the women and sex, correct?

19 A Yeah. I mean, that's sounds about right.

20 Q And you wanted to connect with the men on a deeper
21 emotional level, right?

22 A Yeah.

23 Q So this is January 29, 2012. This is two weeks before
24 you move out, right?

25 A It sounds about right.

D. GILL - CROSS - ROBOTTI

1439

1 Q And you're e-mailing everyone at 1080, telling them you
2 want to be more connected, right?

3 A Uh-huh.

4 Q Correct?

5 A Yes. Sorry. Yes.

6 Q All right. So it's fair to say that throughout 2012, you
7 were volunteering to take on more work at OneTaste, right?

8 A Yeah.

9 Q We just went through seven, eight e-mails. You agree
10 with me on that one?

11 A Yeah. That sounds about right.

12 Q Okay. And you're reaching out to OneTaste leadership to
13 ask for more jobs?

14 A More ways to plug in.

15 Q Okay. You're refocusing on your OM practice with a new
16 research project, right?

17 A Yeah. If I remember correctly, my OM practice had fallen
18 off a little bit, as it did. It ebbed and flowed throughout
19 my time there.

20 Q Okay. And you were choosing to volunteer to take on
21 these additional responsibilities?

22 A That's a complicated answer.

23 Q Well, ma'am, you wrote a lot of e-mails to a lot of
24 people saying you wanted more responsibility, right?

25 A Yes.

D. GILL - CROSS - ROBOTTI

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1 Q Those were choices you made, right?

2 A Yes. And the complication lies underneath why I was
3 choosing those.

4 Q Well, I am not asking you about your regrets now, I am
5 asking you about what you thought then.

6 A Thought then about what? Can you restate the question?

7 Q So I understand, ma'am, that you might regret certain
8 things now, right?

9 A I never said I -- that's also a complicated answer.

10 Q Okay. So maybe you don't regret anything at OneTaste.

11 My question is, what did you think at the time when
12 you were asking for more work? You wanted to do that, right?

13 A Yeah. I wanted to plug in.

14 Q So it's around this time, at the end of 2012, that you
15 volunteered to start spending more time with Reese Jones,
16 right?

17 A What was the date you said again?

18 Q At the end of 2012.

19 A I would not say that I volunteered, I would say that I
20 asked, that I was asked.

21 Q Well, before you were asked, you told Rachael Hemsli you
22 had a crush on Reese Jones; do you remember that?

23 A I do not.

24 Q You had met Reese Jones a couple of times by then?

25 A Yeah. He's a -- I had seen him in the back of courses

D. GILL - CROSS - ROBOTTI

1441

1 with Nicole. He's this bright, shiny, happy guy.

2 Q Charismatic guy, right? Super interesting?

3 A Absolutely. Yeah.

4 Q Very good conversationalist?

5 A Yeah.

6 Q Fun to talk to?

7 A Uh-huh.

8 Q So it's accurate that you had a crush on him at the time,
9 right?

10 A No. I was -- if I'm remembering correctly this
11 conversation -- it's slowly coming back. I think that it was
12 used more like not like an actual crush, it's like, oh, he's
13 so sweet. I've got like a total crush on him or like -- I
14 don't know.

15 Q You said that?

16 A I have a very vague recollection of it.

17 Q Sitting here today, ma'am, yes or no, you said you had a
18 crush on Reese Jones?

19 A I have a very vague recollection of it.

20 Q So the answer is yes?

21 A Yes.

22 Q So that's what you told Rachael Hemsli at the time?

23 A Yes.

24 Q And you were so excited that you were jumping up and down
25 because you wanted to work with Reese; do you remember that?

D. GILL - CROSS - ROBOTTI

1442

1 A I do not remember that.

2 Q And it's true that Reese came to one of your talks at
3 your church, right?

4 A It is.

5 Q You had a good time with him?

6 A He contributed to a lot of fruitful conversation.

7 Q So, yes, you had a good time with him?

8 A Yes.

9 Q And it was after that that you started spending time with
10 him at his house, right?

11 A No. I was already spending time with him at his house
12 when he came to the talk.

13 Q Okay. And in total, you spent about three months going
14 back and forth to Reese's house; is that fair?

15 A That sounds about right.

16 Q And that was until you decided to leave 1080 in February
17 2013?

18 A Yeah. The dates are blurry for me when I removed myself,
19 but that sounds about right.

20 Q All right. And I am not asking about today. I am asking
21 about at that time.

22 You were happy you had been given the opportunity to
23 work with him, right?

24 A I was happy to find a way in to a community that I felt
25 like I belonged to and I had removed myself, and I felt very

D. GILL - CROSS - ROBOTTI

1443

1 unstable.

2 Q You had just spent the last six months telling people at
3 OneTaste that you wanted more responsibility?

4 A Uh-huh.

5 Q Right?

6 A Uh-huh.

7 Q Volunteering for tasks, right?

8 A Uh-huh.

9 Q And when they approached you with this task to work with
10 Reese Jones, you were excited, right?

11 A I was excited to have an "in" to the community and to
12 being accepted again.

13 Q This was an important job, right?

14 A Uh-huh.

15 Q Reese was an important guy to the company, right?

16 A Uh-huh.

17 Q This was someone --

18 A Yes.

19 Q -- close to Nicole Daedone, correct?

20 A Yes.

21 Q This was a good opportunity for you?

22 A What do you mean by "opportunity"?

23 Q The common term of "opportunity." This was something you
24 could take on to move up in the company?

25 A I didn't see it as moving up in the company. I saw it as

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1 finding a place where I belonged after being celebrated for
2 being a sexual person.

3 Q So with whatever definition of "opportunity" you would
4 like to use, this was a good opportunity?

5 A Yes.

6 Q And when you ultimately lived on and off with Reese, it
7 was a very nice place, right?

8 A It was.

9 Q I think we saw some photographs the government showed
10 earlier. We have a couple, I am not going to reintroduce all
11 of them, but let me show you two.

12 MR. ROBOTTI: Can we pull up Defense Exhibit 16-K.

13 Q Do you recognize this as Reese Jones' house?

14 A Yes.

15 Q And 16-K1?

16 And are both 16-K and 16-K1 accurate representations
17 of Mr. Jones' house?

18 A To my memory, yes.

19 MR. ROBOTTI: Your Honor, the defense moves to admit
20 16-K and 16K1.

21 THE COURT: Any objection?

22 MS. GUPTA: No objection.

23 THE COURT: Defense Exhibit 16-K and 16-K1 are
24 admitted.

25 (Defense Exhibit 16-K and 16-K1 received in

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1 evidence.)

2 MR. ROBOTTI: All right. Can we publish -- well, we
3 can publish 16-K1.

4 Q All right, ma'am. So this is a mansion, right?

5 A It's a pretty big house.

6 Q Pretty big house, right?

7 A Yeah.

8 Q In San Francisco?

9 A Yes.

10 Q And they don't make a lot of big houses in San Francisco,
11 right?

12 A No, they do not.

13 Q Right.

14 So this was pretty cool to go live in a mansion in
15 the middle of San Francisco, right?

16 A Yeah, it was nice to experience the luxuries of that
17 place every once in a while. Yeah.

18 Q You were coming from 1080, right?

19 A Uh-huh.

20 Q 1080 wasn't bad, it had a lot of amenities, right?

21 A Uh-huh.

22 Q But 1080 is no mansion, right?

23 A No, it is not.

24 Q So getting to spend a couple months at a mansion, not so
25 bad?

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1 A No, it was very nice.

2 Q Okay. And that was something you wanted to do, right?

3 A That's also a complicated answer.

4 Q Okay. I'm not asking for the lens of hindsight here,
5 right? For the --

6 A I am not talking about the lens of hindsight.

7 Q For the person in her mid 20s, being asked if she wants
8 to go live in a mansion, that was an exciting thing?

9 A That is exciting, yes.

10 Q Mr. Jones also took you to parties, correct?

11 A He took me to one.

12 Q Okay. Nice party?

13 A It was. I didn't particularly enjoy it. It wasn't for
14 me.

15 Q Okay. And he paid for things for you, right?

16 A He paid for very few things, in my memory.

17 Q Dinner?

18 A The occasional -- I think -- I remember going to dinner
19 with him once after that party. The most regular thing that
20 he would pay for, I would drive down the hill to a bagel shop
21 and bring back bagels and lox.

22 Q Okay. And you were paying rent at 1080 at the time,
23 right?

24 A I was.

25 Q Which you were unhappy about, right?

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1447

1 A Yes.

2 Q But you were not paying rent at Mr. Jones' house, right?

3 A No.

4 Q So you were living free in the mansion, correct?

5 A I didn't stay there every single night, but, yes, I was
6 not paying rent there.

7 Q So you still had a room at 1080, right?

8 A Correct.

9 Q Which is one of the reasons you were paying rent there?

10 A Correct.

11 Q And we talked earlier about sugar daddies, right?

12 A Uh-huh.

13 Q Okay. And you acknowledge that you had a financial
14 relationship with an older man before, right?

15 A Uh-huh. Yes.

16 Q And this is before you met Reese, right?

17 A Yes.

18 Q You had a sugar daddy?

19 A Yes.

20 Q And, basically, a "sugar daddy" is an older rich man?

21 A Yes. That's a fair summary.

22 Q Okay. He takes care of a younger woman, known as a
23 "sugar baby" sometimes?

24 A Yes.

25 Q Okay. And you sought out the man who was your sugar

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1 daddy before Reese Jones, right?

2 A You mean, like me going to the site?

3 Q You went to the site, right?

4 A Yes. I was on the site.

5 Q You went to the site looking for a sugar daddy, right?

6 A I believe he sought me out, but I don't remember who
7 messaged who first.

8 Q And this is a website call "Seeking Arrangements"?

9 A I thought it was sugardaddies.com. But it might have
10 been Seeking Arrangements. I don't recall.

11 Q If you listened to the podcast, which we are not going to
12 do, would that refresh your recollection?

13 A Probably not.

14 Q And that sugar daddy, what was his name?

15 A I couldn't tell you.

16 Q You had a longstanding relationship with him, right?

17 A The sugar daddy from that particular website was very --
18 was a different person -- it was, in my mind, a relatively
19 short relationship. There was someone else from Redbook who
20 was a longer-standing, basically, sugar daddy, even though it
21 was from a different site.

22 Q So you had two sugar daddies before Mr. Jones, correct?

23 A Yes.

24 Q Okay. And you entered both of those relationships on
25 your own choice, right?

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1 A That's also a complicated answer.

2 Q You sought out those sugar daddies, right?

3 A Yes. I needed money.

4 Q And, again, there's lots of ways to make money, right?

5 A Uh-huh.

6 Q Lots of people make money through jobs, right?

7 A Uh-huh.

8 Q You had a job?

9 A Uh-huh.

10 Q So this is something you chose to do to make money?

11 A Again, that's a complicated answer.

12 Q And do you remember the name of the second sugar daddy?

13 A Stan.

14 Q Stan.

15 Okay. You had the longer relationship with him,
16 right?

17 A Uh-huh.

18 Q Okay. He took you on trips, right, to Las Vegas?

19 A No. No. That was just my friend Javi.

20 Q Okay. You didn't tell Mygu (ph) on the podcast in 2011
21 that your sugar daddy took you to Vegas?

22 A Oh, he did. The other guy. Not Stan.

23 Q Okay.

24 A He took myself and someone else from OneTaste.

25 Q Okay. So you went on the trip to Las Vegas with this

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1 man, right?

2 A Uh-huh. Yes.

3 Q And he took you to dinner, right?

4 THE COURT: Excuse me.

5 Ms. Bonjean, do you need a minute with your team?

6 MS. BONJEAN: Yes, I do, actually.

7 THE COURT: Okay. Go ahead. We'll wait.

8 MS. BONJEAN: I need one second.

9 THE COURT: Yes, go ahead. You can always ask for a
10 moment if you need it --

11 MS. BONJEAN: Thank you.

12 THE COURT: -- to speak with your paralegal or
13 whoever's behind you.

14 (Short pause.)

15 MS. BONJEAN: Thank you, Your Honor.

16 THE COURT: Go ahead, Mr. Robotti. You may
17 continue.

18 BY MR. ROBOTTI:

19 Q Okay. So Stan took you and your friend out on the town
20 in Vegas; fair to say?

21 A Different -- the other guy that I don't remember the name
22 of.

23 Q Sorry. The other guy took you out on the town with your
24 friend in Vegas, right?

25 A Yes.

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1451

1 Q And you also recall that -- and I think this is with
2 Stan, you learned the skills you used at OneTaste coaching
3 program to help him in his relationship; do you remember that?

4 MS. GUPTA: Objection.

5 THE COURT: One moment, please.

6 (Short pause.)

7 THE COURT: Sustained.

8 MR. ROBOTTI: To form or to substance, Your Honor?

9 THE COURT: Substance. It is sustained.

10 Q All right. So let's go back to Reese.

11 So you really liked Reese when you started working
12 with him, correct?

13 A I liked him as a person. I wouldn't say that I was
14 attracted to him.

15 Q You thought of him as an experienced player; do you
16 remember that?

17 A I do not. No.

18 Q Okay. Do you remember saying that you loved him, in
19 January 2013?

20 A I do not recall that. I am not surprised by it because I
21 definitely overused the term "love."

22 Q Do you remember saying that in your private journal?

23 A No, I don't.

24 MR. ROBOTTI: Okay. Can we pull up Defense Exhibit
25 2-W, at page 10.

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1 A Sorry, what page did you say?

2 Q Page 10. Apologies.

3 A Thank you.

4 MR. ROBOTTI: Sorry. This is just for the witness.

5 Q It actually starts at the bottom of page 9.

6 All right. Do you recall saying in January 2013
7 that: I love the more experienced players like Marcus, Keith,
8 Eric, and Reese. I don't fall in love with them like Robert.

9 Do you remember saying that?

10 A I do not recall saying it, and I recognize my writing in
11 the journal.

12 Q Okay. Is that how you felt at the time?

13 A Yes, with the caveat that love was not what I considered
14 true love, just it was the colloquial term of, oh, I love my
15 shoes, I love my haircut.

16 Q Sure. There's romantic and nonromantic love, of course,
17 right?

18 A Yeah.

19 Q But you're expressing nonromantic love towards Mr. Jones?

20 A Of course.

21 Q So fair to say you were friends?

22 A We were friendly. We didn't become friends until after I
23 started living with him, I would say.

24 Q So you did become friends when you lived there?

25 A I think so.

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1453

1 Q And you grew concerned for him when he was sad; is that
2 fair?

3 A I grew concerned for his state of being, and I felt sad
4 knowing that he was suffering.

5 THE COURT: Mr. Robotti, we are not so close to the
6 end of the day. I just want to know if you have an estimate
7 of how much longer you have?

8 MR. ROBOTTI: I think I am going to be done today,
9 Your Honor. Getting there.

10 THE COURT: Just give me a time frame. Roughly.

11 MR. ROBOTTI: I think close to 5:30, Judge. Maybe a
12 little earlier.

13 THE COURT: Okay. Go ahead.

14 BY MR. ROBOTTI:

15 Q Okay. Now, do you remember in January 2013 you also
16 believed that it was good that Robert was living in Las Vegas
17 because it allowed you to spend time with your other partners,
18 including Reese?

19 A I do not recall saying that. Can you refresh my memory?

20 Q Sure. Pages 17 and 18 of Defense Exhibit 2-W.

21 Towards the end of the page, does this refresh your
22 recollection that: In some ways it would all be a lot easier
23 if he were here, and in others it is so good that he's not.

24 How would I spend all the time I want to with him, Reese,

25 Ryan, and Paul?

D. GILL - CROSS - ROBOTTI

1454

1 A You're probably sick of it, but, again, no specific
2 memory of this. I do recognize that these are the words on
3 the page.

4 Q Now, as we talked about a lot today, you had a lot of
5 competing responsibilities, right?

6 A With --

7 Q During this time in your life?

8 A You mean with jobs and stuff?

9 Q Yes.

10 A Yes.

11 Q Okay. And so it was hard to find the time to spend time
12 with Reese and Robert, do your jobs and all your other
13 responsibilities, correct?

14 A Yes.

15 Q Now, a couple of weeks after this, as we talked about,
16 you and Robert either break up or talk about breaking up,
17 correct?

18 A I'm sorry, say that again.

19 Q February 20, 2013, you and Robert talk about breaking up.

20 A Is that in my journal that we already went over?

21 Q We already -- this is what you testified to earlier
22 about.

23 A Okay. Then, yeah. I am just trying to make sure I am
24 being clear on which one I am testifying to.

25 Q Sure.

D. GILL - CROSS - ROBOTTI

1455

1 Okay. And it was after that discussion with Robert
2 that you decided to leave 1080; do you remember?

3 A Can you refresh my memory, please.

4 Q Sure.

5 You can look at page 57.

6 A Turned right to it.

7 Q Okay. So does this refresh your recollection that it was
8 on or about February 22, 2013 when you decided to leave 1080?

9 A Yes.

10 Q Okay. And you found another job and another place to
11 live, right?

12 A Yes.

13 Q You found another job with friends as their live-in
14 nanny, correct?

15 A Yes.

16 Q All right. That was Sean and Colleen, right?

17 A Yes.

18 Q And you told people at OneTaste you were leaving, right?

19 A I would imagine so.

20 Q Okay. In response, no one forced you to stay, right?

21 A No.

22 Q As you said earlier, no one chained the door shut, right?

23 A No.

24 Q When you told people at OneTaste that you were moving
25 out, they just let you go, right?

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1456

1 A Yeah. No one chained me up anywhere.

2 Q So you told them you wanted to move out, and you left?

3 A Are you waiting for a response? That was a question?

4 Q Yes.

5 A Okay. Sorry.

6 I would imagine that there was a little bit more
7 conversation and protest, and that's probably a fair statement
8 that I -- after all of that protest, I still left.

9 Q Do you remember that or you're imagining that to be?

10 A That's a good question. Probably imagining.

11 Q You took a job that, actually, you were expected to work
12 more time at, right?

13 A Yes.

14 Q You said an extra two nights a month, right?

15 A Yes. That's what it says.

16 Q Okay. And when you told Reese that you were moving out,
17 he wished you well, invited you to stay anytime you wanted?
18 Do you remember that?

19 A He asked me to stay. He didn't wish me well. He asked
20 me to stay and offered money for me to stay there.

21 Q Did he tell you you were always welcome to stay there for
22 free?

23 A Yes.

24 Q Looking at that same page, can you read the bottom, onto
25 the following page to yourself.

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1457

1 A 57 to 58?

2 Q Yes.

3 Okay. Does that refresh your recollection that in
4 response to Reese saying that you were welcome to stay there
5 for free, you said: I think I would do it if I didn't feel
6 the need for space from OneTaste?

7 A I don't recall saying that, and it doesn't surprise me.
8 I would have loved to not have to work extra hours while also
9 not paying rent at 1080.

10 Q Do you recall saying in your private journal: I really
11 enjoy spending time with him and being around him and talking
12 to him?

13 A I did enjoy spending time with him. That's true.

14 Q And after you moved out, you saw Reese again a few times,
15 right?

16 A I think after I moved out, if I am remembering correctly,
17 I would still go over there every once in a while because he
18 had not yet intoxicated himself.

19 Q And when you did return and see he was intoxicated, that
20 troubled you, right?

21 A Of course.

22 Q Because he -- you cared about him?

23 A Yeah.

24 Q And at that point, he begged you to stay, right?

25 A I wouldn't say he begged me, but he asked me to.

D. GILL - CROSS - ROBOTTI

1458

1 Q He offered you money?

2 A Uh-huh.

3 Q And you turned that down, right?

4 A Uh-huh.

5 Q You said no?

6 A Uh-huh.

7 Q And as for Robert, when you left, you wanted him to stay
8 at OneTaste, right?

9 A I wanted him to make his own choices.

10 Q Well, isn't it true at that time you hated the idea of
11 him quitting?

12 A If I'm remembering correctly, I hated the -- I didn't
13 want him to hate me for telling him that I didn't want him
14 involved. And I needed him to come to his own decisions.

15 Q Well, is it true at that time you believed he was
16 confronting his shit, but that you believed he should push
17 through to the other side? Do you remember that?

18 A Can you refresh my memory, please.

19 Q Sure. It is 58.

20 All right. Does that refresh your recollection that
21 at that time you believed he was confronting his shit, but
22 that you thought he should push through to the other side?

23 A I mean, I don't remember this, and I am not surprised by
24 it.

25 Q Okay. And is it true that at the time you left OneTaste,

D. GILL - CROSS - ROBOTTI

1459

1 you genuinely thought there was a lot left for him in Las
2 Vegas?

3 A I am surprised by that. I don't recall that at all.

4 Q And looking at page 59, does it refresh your recollection
5 that in February 2013 you wrote in your journal: I genuinely
6 think there's a lot left at OneTaste in Vegas for him?

7 A I do see that in my journal. I don't recall it.

8 Q Okay. And you don't disagree you wrote it, right?

9 A Correct.

10 Q Now, even though when you left you really missed Robert,
11 right?

12 A When who left?

13 Q When you left OneTaste, you really missed Robert,
14 correct?

15 A I was still seeing him so I'm not entirely sure what you
16 mean.

17 Q Do you recall avoiding seeing him when he came to San
18 Francisco?

19 A I don't. Will you refresh my memory?

20 Q Sure. Pages 63 to 64.

21 Do you recall that when Robert came after you left
22 OneTaste, you said: I'll probably avoid just going to 1080
23 the entire time?

24 A I do remember avoiding 1080. I don't remember avoiding
25 him. In my memory, he stayed with me a couple of nights at

D. GILL - CROSS - ROBOTTI

1460

1 Sean and Colleen's. So I don't recall this at all.

2 Q Okay. Do you recall that at this point in time your
3 situation with Robert was really difficult on you? Do you
4 remember that?

5 A Yes. It was a very stressful relationship.

6 Q Okay. And do you remember as a result of what's going on
7 with Robert, you were not excited by anything, work, seminary,
8 OneTaste, OMing; do you remember that?

9 A I do not. Will you refresh my memory?

10 Q Sure.

11 Can we look at pages 69 to 70. Actually, it is at
12 the bottom of 70.

13 A I'm done.

14 Q All right. Does that refresh your recollection that at
15 this time, after you left OneTaste, you were upset about
16 Robert?

17 A I was very upset about Robert and the manipulation going
18 on in our relationship behind the scenes.

19 Q Okay. But it's fair to say that when you chose to leave
20 OneTaste, one of the big reasons you were upset was Robert,
21 right?

22 A The manipulation of my relationship with Robert. Not
23 Robert personally.

24 Q With what had been going on in your relationship with
25 Robert, correct?

D. GILL - CROSS - ROBOTTI

1461

1 A Because of the manipulation, yes.

2 Q So it's fair to say that one of the reasons you were so
3 upset was Robert?

4 A I was upset because of the manipulation in my
5 relationship with Robert. Not Robert personally.

6 Q Now, you continued to OM after you left 1080, right?

7 A I believe so. For a short period. If I am remembering
8 correctly, it was only with Robert, but I don't have a whole
9 lot of memory of my OMs after moving out.

10 Q Well, if we look at Defense Exhibit 73.

11 A You said page 73?

12 Q 73, yes. Of 2-X -- Defense Exhibit 2-W. Apologies.

13 A Okay. I am done reading.

14 Q So after you left -- does that refresh your recollection
15 that after you left OneTaste, you continued to OM with
16 multiple other partners?

17 A I don't remember OMing with multiple partners, but it
18 says so in my journal.

19 Q All right. So after you left 1080, you made plans to
20 move out of the state, right?

21 A Yes.

22 Q You moved to New Jersey to go to seminary school?

23 A Yes.

24 Q And you ultimately became a pastor, right?

25 A Yes.

D. GILL - CROSS - ROBOTTI

1462

1 Q Okay. And you were making the plans to go to seminary
2 school while you were at OneTaste, right?

3 A I don't believe so.

4 Q Can we look at --

5 A There may have been an inkling of wanting to go into
6 ministry, but in my memory, it was not until I was living at
7 Sean and Colleen's that I was -- that I decided to go to
8 seminary.

9 Q Well, can we agree that based on our conversations today,
10 memories are sometimes wrong?

11 MS. GUPTA: Objection.

12 THE COURT: Overruled.

13 A Memory is very unreliable, yes.

14 Q Okay. Sometimes it's hard to remember things that
15 happened a long time ago?

16 A Especially the timeline of it, yes.

17 Q Yeah. And what you were feeling 15, 20 years ago?

18 A I don't forget the feelings of it.

19 Q Sometimes it's helpful to have a document that was
20 written at that time, right?

21 A It is.

22 Q All right. Can we look at page 34 to 35.

23 Does that refresh your recollection that in January
24 2013, you wrote in your private journal: I started the
25 process towards seminary today?

D. GILL - CROSS - ROBOTTI

1463

1 A Yeah. I believe that where the lack of clarity in my
2 mind is the process -- I'd kind of forgotten about this part,
3 the process of going to seminary is a very long onboarding
4 process. You have to have a conversation with your pastor,
5 read a book, talk about that book with them. And in my mind,
6 when you were initially asking, I was thinking of like
7 applying to grad school process. So I apologize.

8 Q So we can agree by January 2013, you were already
9 thinking about your exit toward seminary school, right?

10 A Yeah.

11 Q Okay. And you were able to meet with the church
12 official?

13 A You mean my pastor?

14 Q Was it your pastor? Sorry.

15 A Yes.

16 Q And your understanding was that to go to seminary school,
17 you'd have to give up being polyamorous; is that right?

18 A Yeah. Yeah. That's fair.

19 Q And at the time, that was something you didn't want to
20 do, right?

21 A I really wrestled with it in therapy. There's a lot of
22 conditioning that I was overcoming.

23 Q And it scared you, right, to move forward?

24 A With monogamy?

25 Q With monogamy?

D. GILL - CROSS - ROBOTTI

1464

1 A Yes.

2 Q But you did move forward, right?

3 A I did.

4 Q So you were willing to change your sex practices because
5 you wanted to go to seminary school, right?

6 A Yeah. I was starting to actually stand in my own self.

7 Q And it's fair to say that you let the church tell you who
8 you could and couldn't be in a relationship with?

9 A They never told me who I could and couldn't be in
10 relationship with. They told me I could be in relationship
11 with one person at a time, which is very different, in my
12 mind.

13 Q But not more than one person at a time, right?

14 A Right.

15 Q That was a rule?

16 A Not a rule. Just unadvised.

17 Q If you wanted to go to seminary school, that was a rule
18 you had to follow?

19 A Again, not a rule. Just advised.

20 Q Advised. Strongly advised?

21 A Uh-huh.

22 Q Advised.

23 Okay. And you chose to do that because you believed
24 in the church's teachings, right?

25 A I mean, that's a complicated answer. There are a lot of

D. GILL - CROSS - ROBOTTI

1465

1 the church's teachings that I disagree with. There are a lot
2 of the church's teachings that I am obviously onboard with. I
3 wouldn't have been ordained otherwise.

4 Q Okay. But you agreed to no longer be polyamorous because
5 you wanted to be a part of the church?

6 MS. GUPTA: Objection. Asked and answered.

7 THE COURT: Sustained.

8 How much more do you have now?

9 MR. ROBOTTI: Just five minutes, Judge.

10 THE COURT: Great. We can keep going then.

11 BY MR. ROBOTTI:

12 Q Now, in July 2014, after -- a long time after you left
13 OneTaste, you reached out to Rachel Cherwitz, right?

14 A That sounds about right. I don't remember exact -- the
15 exact dates, but I do recall reaching out to her, and I
16 believe that's when I ended up going up to New York for that
17 demo.

18 Q And she was very excited to see you?

19 A She was.

20 Q All right. And you thought it was awesome to see her,
21 right?

22 A It's always -- it's a mixed bag.

23 Q At that time, you told Rachel it was awesome to see her,
24 right?

25 A I did tell her that. I believe I told her that.

D. GILL - CROSS - ROBOTTI

1466

1 Q Okay. And you had just spoken to an interfaith minister
2 about OM and God?

3 A I don't recall that.

4 Q All right. This will be the last document we look at
5 here.

6 MR. ROBOTTI: Can we pull up Defense Exhibit 2-BF.

7 Q I believe you have that in front of you.

8 THE COURT: Just for the witness, right?

9 MR. ROBOTTI: Just for the witness, Your Honor.

10 Q And we will look at page 34. And, also, just take a look
11 at page 35, as well.

12 A Can you scroll back to the -- I wasn't done reading.
13 Sorry.

14 THE COURT: Does she have a hard copy? It might be
15 easier. You are welcome to come up and look for it, if you
16 need to.

17 MR. ROBOTTI: It should be up there.

18 A Yes. What page?

19 Q 34, 35.

20 A Thank you.

21 THE COURT: What's the question?

22 MR. ROBOTTI: I was giving her a moment to finish,
23 Your Honor.

24 Q All right. At that point you intended to put Rachel in
25 touch with a minister and her partner about OM?

D. GILL - CROSS - BONJEAN

1467

1 A I don't know if I was intending to put her in touch. I
2 was just telling her -- I don't have any recollection of this
3 person, who this person is.

4 Q Okay. And Rachel responded, I love you so much?

5 A Yes, she did.

6 Q It felt so warm and wonderful to see you. Correct?

7 A Yes.

8 MR. ROBOTTI: No further questions, Judge.

9 THE COURT: Any cross-examination, Ms. Bonjean?

10 MS. BONJEAN: Yes, I do.

11 THE COURT: Go ahead. You may proceed.

12 MS. BONJEAN: Thank you.

13 CROSS-EXAMINATION

14 BY MS. BONJEAN:

15 Q Good afternoon. Ms. Gill, correct? Is that the last
16 name?

17 A Gill, yes.

18 Q I have seen Gill and Gillport. Gill is right?

19 A Yes, it is.

20 Q All right. My name is Jennifer Bonjean, and I represent
21 Ms. Daedone.

22 You testified today about your upbringing on direct
23 examination; do you remember that?

24 A Yes.

25 Q And I think you testified on direct examination, pursuant

D. GILL - CROSS - BONJEAN

1468

1 to questioning of the US Attorney's Office, that you believed
2 that your upbringing played a role in sort of your attraction
3 to OneTaste?

4 A Yes.

5 Q All right. And that upbringing was a fundamentalist
6 Christian upbringing, right?

7 A It is a very traditional Evangelical upbringing, yes.

8 Q Okay. And that Evangelical Christian upbringing meant
9 that you had to respect authority, right? You said that?

10 A Yes.

11 Q And in your household that authoritarian figure was your
12 father, correct?

13 A Yes. And then secondarily my mother.

14 Q Okay. You also -- you had a purity ring, right?

15 A I did.

16 Q Can you tell the ladies and gentlemen of the jury what a
17 purity ring is?

18 A A purity ring is given to a young woman, usually on her
19 16th birthday, as a sign of commitment to God and her father
20 that she won't have sex before marriage.

21 Q And who gave you that purity ring?

22 A My parents.

23 MS. GUPTA: Objection.

24 THE COURT: Basis?

25 Stop please.

D. GILL - CROSS - BONJEAN

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1 Basis?

2 MS. GUPTA: Relevance.

3 THE COURT: Sustained. And I will strike the answer
4 and the question.

5 MS. BONJEAN: They introduced this, Your Honor.

6 This was --

7 THE COURT: Excuse me. You can go onto the next
8 question.

9 BY MS. BONJEAN:

10 Q And as you testified on direct examination, there were
11 certain attitudes about sex that you grew up with, right?

12 A Yes.

13 Q Okay. Can you explain to the ladies and gentlemen of the
14 jury what those attitudes about sex were that you grew up
15 with?

16 A That sex happens within the confines of marriage.

17 Q Okay. Anything else?

18 A Not that I can think of at the moment.

19 Q I take it that polyamorous relationships were not
20 consistent with your upbringing?

21 A No, they were not.

22 Q Okay. Same sex relationships were not consistent with
23 your upbringing?

24 A Correct.

25 Q I am guessing OMing probably was not consistent with your

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1 upbringing, right?

2 A Correct.

3 Q And during your upbringing, you struggled with accepting
4 those values, right?

5 A Well, I identify as queer, and so I always felt like that
6 part of me was rejected by my family and our family values.

7 Q And what is -- not to be ignorant, can you describe what
8 you mean by "queer"?

9 A Yeah. I am attracted to people and not their genitalia.
10 So I find connection with the person rather than with their
11 gender identity.

12 Q Okay. So it could be someone who identifies as man, or
13 someone who identifies as a woman, right?

14 A Correct. Or a trans man, or a trans woman, or nonbinary.

15 Q Okay. And you also testified, though, that you had a
16 very loving family?

17 A I did.

18 Q And you do, correct?

19 A Yeah.

20 Q And they were always loving, right?

21 A There were moments of missed messaging, mismanaged
22 messaging, but I think that love has always been there.

23 Q And they were always there for you in times of crisis,
24 right?

25 A I wouldn't say always.

D. GILL - CROSS - BONJEAN

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1 Q Were there occasions where you reached out to them in
2 crisis and they rejected you?

3 A Yes.

4 Q You had siblings?

5 A One.

6 Q A sister, right?

7 A Uh-huh.

8 Q And your father was a police officer, correct?

9 A Yep.

10 Q A narcotics police officer?

11 A For the earlier part of his career, yes.

12 Q Okay. Now, you had a good relationship with your mother?

13 A I mean, yeah. I think that I -- yes. It became
14 strained.

15 Q Right. But you testified, I think you told us a story
16 about how you were on the hot seat and that you were kind of
17 pushed off the hot seat because you told people at OneTaste
18 that you had a good relationship with your mother. Do you
19 remember that?

20 A I remember being dismissed after saying that, yes.

21 Q Right.

22 My question, though, is, at that time, when you said
23 that, you had a good relationship with your mother?

24 A It had already started to become strained, but, yes.

25 Q Okay. So when you told everyone in the room that it was

D. GILL - CROSS - BONJEAN

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1 good, you meant it was good and strained or --

2 A I meant that the history of my relationship with my
3 mother was overall good.

4 Q Okay. Now, you testified that you went to college.

5 What college was that?

6 A UC Santa Barbara.

7 Q And you studied English and French, correct?

8 A I did.

9 Q And you moved to Hawaii after that?

10 A Yeah. Like not immediately after, but yeah.

11 Q Did you get a job after college?

12 A I did.

13 Q What type of job?

14 A I worked first at a discount clothing store and then at a
15 credit union.

16 Q All right. And you lived in Hawaii, I think, for two
17 years, right?

18 A Yeah. About that.

19 Q And you were working as a waitress, right?

20 A Uh-huh.

21 Q You said you were doing a whole lot of nothing, correct?

22 A Uh-huh.

23 Q Is that a yes?

24 A Yes. Sorry.

25 Q And you weren't saving any money, right?

D. GILL - CROSS - BONJEAN

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1 A No.

2 Q Living paycheck to paycheck on tips, right?

3 A Right. It's very expensive to live in Hawaii.

4 Q Right.

5 And after two years of doing a whole lot of nothing,
6 you moved back to San Francisco, right?

7 A No. I moved to Sacramento. I moved in with my parents.

8 Q Okay. So you moved back home?

9 A I did.

10 Q And is that when you met Aubrey Fuller and Andreas -- how
11 do you say it?

12 A Panosyan.

13 Q Panosyan?

14 A I met Andreas first. I was living with my parents, and I
15 was going into Nugget Markets, which is a family-owned grocery
16 store, and he was doing an olive oil demo. I was on my way
17 into an interview. And he saw me, and we started chatting,
18 and then we ended up going on a date later that week.

19 Q I see.

20 So you met him, and you kicked it off, sort of,
21 there was some connection there, and you went on a date?

22 A Yes.

23 Q And it was during that date that he told you that he was
24 dating a woman named Aubrey Fuller, but it was an open
25 relationship, right?

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1 MS. GUPTA: Objection.

2 THE COURT: Basis?

3 MS. GUPTA: Hearsay.

4 THE COURT: Yes. Sustained.

5 Q Okay. Did you testify on direct that Aubrey and Andreas
6 were in a relationship?

7 A They were.

8 Q Okay. Were they in a monogamous relationship?

9 A No. To my memory, he did not tell me about Aubrey until
10 at least a few dates in.

11 Q All right. And you testified on direct that you met some
12 rowdy friends, I think; is that right?

13 A Those would be the rowdy friends.

14 Q Those are the rowdy friends, right?

15 And they were rowdy because they were in a social
16 circle that did acid and MDMA and different drugs, right?

17 MS. GUPTA: Objection.

18 THE COURT: Basis?

19 MS. GUPTA: Relevance.

20 THE COURT: Overruled.

21 A Yes. They introduced me to those two drugs.

22 Q Okay. Because that's a social circle that you became a
23 part of?

24 A Yes.

25 Q And that was Aubrey and Andreas's fault, right?

D. GILL - CROSS - BONJEAN

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1 A No.

2 Q Okay. So it wasn't their fault?

3 A I mean, no, I was in a sad and lost place. I have never
4 thought of placing blame on them for my drug use.

5 Q Okay. So even though you were exposed to it, you don't
6 blame them for you having chosen to do drugs, right?

7 A No.

8 Q Now, these were two people that were also associated with
9 or had become involved at OneTaste -- with OneTaste at some
10 point, right?

11 A Yeah. In my memory, Aubrey was involved far earlier than
12 Andreas because she was seeing someone else who I think -- I
13 don't know if he lived -- he lived at some center. I don't
14 know if it was OneTaste or somewhere else.

15 Q And this is how you found your way at a TurnON event
16 associated with OneTaste, right?

17 A Yes. Aubrey invited me.

18 Q And this event was exciting to you, correct?

19 A It was.

20 Q And it was something new, right?

21 A It was.

22 Q And it was very different than sort of the thinking that
23 you had been raised with, right?

24 A It was.

25 Q It fed something in you that had not been previously fed,

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1 right?

2 A It celebrated the part of me that my parents -- that I
3 felt like my parents had rejected.

4 Q And that was your sexuality?

5 A Yes.

6 Q I mean, are parents supposed to embrace their children's
7 sexuality?

8 A I would embrace my son's.

9 Q All right. And you were looking for an environment where
10 you could be open sexually, right?

11 A Yeah. I had never had an environment that was permissive
12 of figuring out who I was in the sexual realm.

13 (Continued on the next page.)

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Gill - Cross - Bonjean

1477

1 BY MS. BONJEAN: (Continuing.)

2 Q And during this period of time, you were still obviously
3 in contact with your family, but am I to assume you didn't
4 tell them about your connection to OneTaste?

5 A I'm pretty sure I did.

6 Q So you had a good enough relationship where you could
7 tell your Evangelical Christian parents that you had just
8 become associated with a group that had a primary tenet of
9 orgasmic meditation?

10 A At this point they hadn't been involved in the church for
11 a long time. They had started to shift a little bit.

12 Q Not as conservative?

13 A A little bit more -- they valued -- they valued the
14 relationship with me more than the other.

15 Q Right. Age will do that; right?

16 MS. GUPTA: Objection.

17 THE COURT: Sustained.

18 Q At which point did you start living with Malachi?

19 A I was staying at his house allot when he lived in the
20 Sacramento area. I don't think I formally moved in with him
21 until we moved down to Oakland.

22 Q And just so I understand, you're living with your parents
23 but you're dating this guy Malachi, is that a yes?

24 A Yes.

25 Q And Malachi is not a OneTaste fellow?

Gill - Cross - Bonjean

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1 A Not yet.

2 Q You introduced him to OneTaste?

3 A I don't know -- well, we had broken up after all of that.
4 He was already familiar with it because he came to that first
5 TurnON that I went to.

6 Q Got it. So at some point you and Malachi I guess start
7 spending time together. You are still formally living at your
8 parents'; right?

9 A You mean before I moved in with him?

10 Q Yes.

11 A Yes.

12 Q And you moved in with him and was that in Sacramento or
13 did you move in with him and went to Oakland?

14 A That's where my memory is a little bit fuzzy.

15 Q How long did you live with Malachi?

16 A I couldn't tell you. I don't think it was more than a
17 year. I'm pretty sure it was less than a year.

18 Q Can you give me a date range here? Is it 2009 basically
19 or '10?

20 A No, because -- I'm pretty sure by 2010 I was moving -- I
21 had moved into 1080. So, yeah, it was probably the 2009 range
22 if I had to throw a dart in the dark.

23 Q And in 2009 you're living with Malachi and he has a drug
24 problem you said; right?

25 A Yes, he did.

Gill - Cross - Bonjean

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1 Q And, in fact, he had a serious drug problem that resulted
2 in him assaulting you or something of that nature?

3 A Yes, he did.

4 Q And you called Ms. Cherwitz in sort of this state of
5 crisis, right?

6 A Yes, the following day, yes.

7 Q And you wanted somewhere safe to go; correct?

8 A Yeah.

9 Q And she provided that?

10 A Yeah.

11 Q Is there a reason you didn't call your family or --

12 A That relationship had already started to become so
13 strained because they hated Malachi and knew that I was using
14 drugs and they hated that. So it didn't feel like it was an
15 option for me.

16 Q Okay. You didn't ask them to get you help to go to
17 rehab, right?

18 MS. GUPTA: Objection.

19 THE COURT: Basis?

20 MS. GUPTA: Relevance.

21 THE COURT: Sustained.

22 BY MS. BONJEAN:

23 Q Instead you went to OneTaste where Rachel Cherwitz got
24 you some housing; correct?

25 A Yes.

Gill - Cross - Bonjean

1480

1 Q I think you testified on direct, but perhaps I'm wrong --
2 strike that.

3 At some point I think you said you were living out
4 of a car. Was that around this time, too?

5 A It's -- that was -- I don't believe I ever testified that
6 I was living out of a car.

7 Q My apologies. Were you living out of a car to some
8 point?

9 A Only to the extent that my stuff stayed in my vehicle
10 until I could move into 1080.

11 Q Got it. So it was short-lived?

12 A It was very short-lived.

13 Q But you went then to 1080; right?

14 A Yes.

15 Q And you testified on direct examination that you ended up
16 going into debt while at OneTaste; right?

17 A I ended up owing for the courses if I'm remembering what
18 I said correctly. That's what I intended to say.

19 Q You were in debt to OneTaste for your courses, right?

20 A Yes.

21 Q But it's also true that you showed up at OneTaste's
22 doorstep broke; right?

23 A Yes.

24 Q And for a while you were not required to pay any rent
25 there, right?

Gill - Cross - Bonjean

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1 A Yeah, they gave me a grace period until I could find a
2 job.

3 Q And you really couldn't find a job so they gave you the
4 opportunity to work off the rent; right?

5 A I believe that's when I went to Lilia Bell's and started
6 working at Lilia Bell's.

7 Q Was that OneTaste associated or no?

8 A No.

9 MS. BONJEAN: One second. Your Honor, if you could
10 give me one second.

11 THE COURT: I was going to actually wrap up in a
12 minute or two because we do have an issue to take up. But if
13 you have one or two more questions that make sense to ask now,
14 I will let you do that.

15 MS. BONJEAN: Sure.

16 Q I know Mr. Robotti asked this to you, but I'll ask it to
17 you; do you remember giving a number of interviews to the FBI
18 and members of the U.S. Attorney's Office over the last few
19 years, right?

20 A Yes.

21 Q And I know you looked at some of those reports; correct?

22 A Yes.

23 Q And specifically do you remember giving an interview with
24 a Special Agent McGinnis and a couple of U.S. attorneys on
25 September 21st of 2022?

Gill - Cross - Bonjean

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1 A No. Would you refresh my memory?

2 MS. BONJEAN: Yeah, sure. I would be happy to.

3 THE COURT: Do you want to maybe break here?

4 MS. BONJEAN: Sure, yeah. We can do that.

5 THE COURT: Okay. Just it strikes me it would take
6 maybe more than a minute or two.

7 MS. BONJEAN: It would probably take a minute and
8 I'm sure everyone is exhausted.

9 THE COURT: Okay. Why don't we -- we're going to
10 break right now. So the witness can step down.

11 (Witness steps down.)

12 (Jury exits.)

13 (Continued on the following page.)

14 THE COURT: Please be seated.

15 MS. FARRELL: Your Honor, may we speak to the
16 witness about her hotel?

17 THE COURT: Yes. I wanted to remind the parties
18 that I wanted to bring Juror No. 5 in just to maybe get a bit
19 more information about this medical dental procedure and I'll
20 hear from the parties on what your proposal is, but my current
21 thought is to indicate to him that if a juror is not here
22 trial can't proceed and, therefore, you know, I wanted to just
23 explore with him whether he could make arrangements to do this
24 at a different time or perhaps end of the day. You know, just
25 kind of get a sense of that.

Gill - Cross - Bonjean

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1 Does anyone have any specific requests in that
2 regard?

3 MS. FARRELL: That sounds appropriate.

4 MS. BONJEAN: Yes, Your Honor.

5 THE COURT: Can we bring in Juror No. 5 right now?

6 (Juror No. 5 enters.)

7 THE COURT: Sir, if you could take your regular
8 SEAT, if you don't mind. And really any seat is fine. I
9 won't keep you long.

10 Yesterday you had given to Mr. D'Agostino a letter
11 from, I believe, it's a dentist.

12 JUROR NO. 5: Yes.

13 THE COURT: And it talks about your need for a
14 procedure and it references a date of Thursday the 22nd of
15 May.

16 JUROR NO. 5: Yes.

17 THE COURT: So I wanted to mention to you that if a
18 juror is not here, we can't have trial that day so I wanted to
19 get more information from you to see whether there is a way
20 perhaps this could be taken care of and not have to miss a day
21 of trial. I wonder if there's any flexibility. If you can
22 maybe go to the dentist and get more information or maybe it's
23 something that can be done at the end of the day and we can
24 break a little bit earlier.

25 JUROR NO. 5: Yes, I can talk to him. I think it

Gill - Cross - Bonjean

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1 might be possible to do it at the end of the day. I
2 understand the procedure, in order to do it that particular
3 day is when the specialist comes in. I know the original
4 schedule I had was for the morning. I will speak to him.
5 Hopefully he can do it at the end of the day.

6 THE COURT: I would ask if you can explore whether
7 there's also maybe a different day that you can do it. I
8 don't know how urgent it is, and I certainly don't want to put
9 your health at any risk, but I just, you know, again, we can't
10 have trial if you're not here.

11 So, I don't know if you can get in touch with your
12 doctor tonight or maybe first thing in the morning, but if you
13 can maybe just try to have it scheduled in a way that allows
14 you to be here for a trial day.

15 JUROR NO. 5: Okay.

16 THE COURT: If this is the only day the specialist
17 is there that's one issue, but we're not sitting this Friday
18 the 16th so maybe that's a possibility and you can explain
19 that you're on this jury, which they seem to know from this
20 letter and I appreciate your efforts and anything you can do
21 that doesn't jeopardize your health.

22 JUROR NO. 5: I will speak to him today if I can.
23 And I will let the deputy know as soon as I know.

24 THE COURT: I think you can just write a short note
25 with any updated information and hand it to Mr. D'Agostino

Gill - Cross - Bonjean

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1 when you have it.

2 JUROR NO. 5: Okay.

3 THE COURT: Thank you and have a good evening.

4 (Juror No. 5 exits.)

5 THE COURT: Okay. So, we'll get more information
6 tomorrow.

7 Let me just ask if there's anything else in advance
8 of tomorrow that we need to take up and maybe, Ms. Bonjean,
9 really rough estimate?

10 MS. BONJEAN: I won't be long.

11 THE COURT: That is fine.

12 MS. BONJEAN: In fact, it will allow me to go back
13 and make sure I'm not duplicating anything.

14 THE COURT: I am not trying to curtail your
15 substance. I just really wanted an estimate.

16 MS. BONJEAN: I can't imagine it would be more than
17 an hour probably less than.

18 THE COURT: And then any redirect you would
19 anticipate based on what you know now?

20 MS. GUPTA: Yes, Your Honor. I think it will be
21 brief.

22 THE COURT: Anything else? Is there any other
23 documents that I don't have that I should have?

24 MS. BENSING: Yes, Your Honor. There's a couple of
25 things. First I wanted to give the Court the witness lineup

Gill - Cross - Bonjean

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1 for the following day.

2 THE COURT: I was going to ask.

3 MS. BENSING: We will have victim witness up next.

4 THE COURT: This is the person who's the resident?

5 MS. BENSING: Exactly, Your Honor. And after that
6 will be an individual named Chris Kosley. There are a couple
7 of issues with respect to Mr. Kosley that I wanted to flag for
8 the Court.

9 We anticipated introducing a number of videos
10 through Mr. Kosley. We've given that list previously to the
11 defense. I've asked them to let me know by 5 p.m. of any
12 issues with rule of completeness with respect to any of the
13 videos. They do come with much longer videos. The Court has
14 the relevant video clips and I believe we've previously
15 provided --

16 THE COURT: What are they? I've got a lot of
17 material from you.

18 MS. BENSING: Yes. And I sent via e-mail to
19 Mr. D'Agostino the list of videos specifically that I intend
20 to introduce.

21 THE COURT: And I assume you are CCing your
22 adversaries?

23 MS. BENSING: Yes. I wanted to raise it now because
24 we will not be able to edit these on the fly.

25 THE COURT: What are they? I mean, just general

Gill - Cross - Bonjean

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1 category?

2 MS. BENSING: It's mainly defendant's statements,
3 Your Honor.

4 THE COURT: In terms of what? Is it a presentation,
5 an interview?

6 MS. BENSING: Some of them are videos of Ms. Daedone
7 speaking to an audience. Some of them are videos of
8 Ms. Daedone speaking in courses or Ms. Cherwitz speaking at
9 courses. There's one depicts the interior of the warehouse.

10 THE COURT: And Mr. Kosley's relationship to these
11 is what?

12 MS. BENSING: He was the video editor at OneTaste
13 during the entirety of the relevant time period and has these
14 stored on drives that he had. So that's the universe but
15 we're not introducing the full videos. Some of them are very,
16 very long so I had flagged yesterday morning for the defense
17 the specific clips, but I just wanted to raise that we won't
18 really be able to take these necessarily at a break because
19 this is a large majority of what I intend to admit through
20 this witness.

21 THE COURT: I am not sure I'm understanding whether
22 you're saying that there may be an objection to the admission
23 at all or just to wanting to add for completeness sake
24 additional information?

25 MS. BENSING: Well, I don't think I have that yet

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1 from the defense which is why I'm raising it. It does need to
2 be addressed in advance because that's what I'm introducing
3 through this witness.

4 MS. BONJEAN: I understand that they're lengthy
5 videos and I have to look at them and unfortunately I know we
6 got them recently, but there's a lot of hours to look at and I
7 may be asking the Court to do what the Court did -- or what
8 the Government did with the other speech that Ms. Daedone gave
9 at CP6, put the whole thing in, use whatever clips you want
10 and then I can use whatever I want for context.

11 THE COURT: How long are these in total in terms
12 of --

13 MS. BENSING: Hours, Your Honor.

14 THE COURT: It sounds like you do not want to offer
15 the whole thing.

16 MS. BENSING: No. We do not and we produced these
17 as part of our initial exhibits in November.

18 MS. BONJEAN: With about 5,000 hours of video, with
19 all due respect. It was hard to narrow that count, but in any
20 event I'm going to look at it. I will propose what I believe
21 is an appropriate context and the Court will rule and we'll go
22 from there, but I understand it can't be done on the fly.

23 MS. BENSING: I just need to know in advance.

24 THE COURT: But in advance of tomorrow morning.

25 MS. BENSING: Correct.

Gill - Cross - Bonjean

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1 THE COURT: So you need to talk to each other in
2 advance. I can't make a ruling until I have the materials and
3 know the position of the defense or whether there's additional
4 information. I'm not going to look at hours and hours of
5 video during every evening and during every break because it's
6 not an efficient way for the parties to handle this. I'm
7 happy to look at things that make sense to look at, but if you
8 can anticipate this, there's a better way to handle this.

9 MS. BENSING: Yes, and that's why we gave the Court
10 the shorter clips.

11 THE COURT: That only gets you partway there. What
12 I'm hearing from the defense is that shorter clips may not be
13 sufficient. And if I'm to determine whether the shorter clips
14 are appropriate if there's objection to them I really need to
15 have more context. So, your method of doing this may be fine
16 but your timing is not fine.

17 MS. BENSING: We did raise it -- I raised it
18 previously with the defense, Your Honor, but I haven't heard
19 back.

20 THE COURT: I am talking about the timing vis-à-vis
21 the Court.

22 MS. BENSING: I understand, Your Honor. One more
23 thing on that I want to hand up to the Court a series of
24 subtext exhibits that we tend to introduce.

25 THE COURT: What is subtext?

Gill - Cross - Bonjean

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1 MS. BENSING: Full text chains that are marked as
2 Government exhibits and we have subexhibits that we provided
3 to the defense that we intend to admit.

4 THE COURT: I am not understanding what you're
5 saying when you say subexhibits.

6 MS. BENSING: Portions of the larger text message
7 chain, Your Honor. So I want to hand up copies of those for
8 the Court as we anticipate those will be introduced through
9 that same witness.

10 THE COURT: The same issue is there going to be an
11 issue of completeness or something you haven't had a chance to
12 look at.

13 MS. BONJEAN: I haven't had a chance and, Your
14 Honor, in all fairness we got the videos for Kosley at 6:43 on
15 Monday. That was yesterday. We then came to court. We
16 litigated all day. We came back. We spent two hours writing
17 an opposition to their attempt to put in the video from --

18 THE COURT: Lit me stop you there. You could have
19 raised it at the end of the day. That one wasn't an obvious
20 one. When I gave you a deadline for joint filings that wasn't
21 an invitation to make filings every evening. We're here. Is
22 there something to raise?

23 If somebody had said to me we want you to look at
24 this three-minute video where genitalia is pixilated, but here
25 is what it's about, that would have been a quick thing to

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1 handle instead of you spending your time.

2 MS. BONJEAN: We didn't know.

3 THE COURT: Okay, but talk to each other. This
4 trial is going more slowly than it should be going based on
5 the content that is coming out as trial.

6 MS. BONJEAN: I understand. I'm just letting the
7 Court know that it's not for lack of diligence that I haven't
8 been able to look at --

9 THE COURT: I am not suggesting that at all. You're
10 in a similar situation as the Court is in on some of these
11 issues, right? And the Government is in a similar issue as
12 the Court is in based on some of the issues as I can tell
13 you're seeing some of these documents as Court is unfolding,
14 right, in terms of materials.

15 MS. BENSING: Yes, Your Honor. And I want to raise
16 one thing with respect to efficiency sake with respect to this
17 witness which is that this witness with respect to a separate
18 employer in approximately 2013/2014 had an incident where he
19 took laptops without permission of the employer, sold them --
20 took those laptops without the permission of his employer sold
21 them on, I believe, Craigslist, Your Honor, and then disclosed
22 this to his employer and had a repayment plan for which he
23 repaid these.

24 I understand that the defense does intend to
25 cross-examine on this. I don't think it's appropriate grounds

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1 for cross-examination. I don't think it pertains to
2 credibility and it's more than a decade ago at this point and
3 the Government is moving to preclude cross-examination on this
4 point, but I want to flag it for the Court.

5 THE COURT: Do you want to comment?

6 MS. BONJEAN: Yeah, it's the same guy that stole all
7 the video from OneTaste.

8 THE COURT: This is Kosley?

9 MS. BONJEAN: Yes. And there's a pattern.

10 THE COURT: I thought the next --

11 MS. BENSING: I expect to get to Mr. Kosley
12 tomorrow.

13 THE COURT: Can you give me now the dates? You said
14 it's over a decade ago.

15 MS. BENSING: It was in approximately 2013 or 2014,
16 Your Honor.

17 THE COURT: Is there a 302 or something that's in
18 the materials that I can look at to get more of this
19 information? If I want to know more about this incident, what
20 do I have in front of me?

21 MS. BENSING: We can file a brief letter for the
22 Court that outlines this in more detail. There is a 302 but I
23 want to be sure that the Court has sufficient information that
24 the Court needs.

25 THE COURT: And your argument is that it's out of

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1 the time frame and you also think it doesn't go to
2 truthfulness; is that what it is?

3 MS. BENSING: Correct.

4 THE COURT: So, you'll put in whatever you put in on
5 this.

6 MS. BONJEAN: I'm not writing a written response to
7 that. We can deal with it in the morning obviously.

8 THE COURT: I think that's fine. I'm not sure I
9 really need one, but the Government is offering to give more
10 information and it's in everybody's interest.

11 Just one more issue that I want to raise about
12 courtroom decorum and I'm not going to call anyone out
13 specifically, but it is my expectation that when a witness is
14 testifying, unless the witness or the lawyer or the Judge
15 cracks a joke, I don't expect anybody to be laughing,
16 particularly not at a witness.

17 I just want to remind everyone that I can see what's
18 going on and if an attorney or a paralegal or anyone else
19 feels that they can't keep it together, you are more than
20 welcome to step out, get a glass of water, get your giggles
21 out, whatever it is, but I don't want any witness on the stand
22 being laughed at.

23 It is just inappropriate and I didn't feel it was
24 necessary to call anyone out specifically at the time, but
25 just be aware that I can see everything and there's really no

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1 need for lack of professionalism like that. Okay.

2 MS. BENSING: Your Honor, there is one other thing.

3 THE COURT: Yes.

4 MS. BENSING: We are at a place where we need to
5 start calling custodians.

6 THE COURT: I am understanding that Mr. Williams is
7 a custodian that's going to be called, right?

8 MS. BENSING: Possibly, Your Honor. It depends on
9 which of those three methods the Court is amenable to --

10 THE COURT: Typically you would have a custodian
11 testify about documents that had been produced; correct?

12 MS. BENSING: Right, Your Honor. And so I think
13 that there was an issue raised with respect to work product
14 privilege, and, so we want to understand the scope of the
15 Court's ruling.

16 THE COURT: Well, my understanding from the other
17 day, I think Ms. Farrell was giving me an update, but I
18 understood that OneTaste is going to have somebody who is able
19 to testify.

20 Are they still asserting some sort of privilege?
21 That wasn't my understanding from what Ms. Farrell said but
22 perhaps I misunderstood you.

23 MS. FARRELL: I may have confused Your Honor. They
24 are providing Mr. Williams as a testifying witness. He -- my
25 understanding is he is going to refuse to answer certain

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1 questions on the basis of privilege.

2 THE COURT: And the question specifically that he's
3 going to refuse to answer in terms of the category?

4 MS. FARRELL: From whom text messages were collected
5 principally. That's --

6 THE COURT: Okay, we'll take this up tomorrow.

7 MS. FARRELL: And I can update the Court on our
8 efforts to procure. So, essentially we have -- as Your Honor
9 remembers, we have three options we outlined.

10 THE COURT: I remember.

11 MS. FARRELL: We can call someone from the U.S.
12 Attorney's Office about the receipt of the materials. We
13 received authorization from DOJ and we have subpoenaed three
14 lawyers for Mr. Williams and also the attorney who directed
15 the collection of the materials.

16 THE COURT: And who is that?

17 MS. FARRELL: A woman named Nancy Clarence, I
18 believe, an attorney. And then the attorney who actually,
19 like, handled the physical production, who is Paul Pelletier
20 and Mr. Williams who is the in-house attorney. So we've
21 served all three of them via e-mail after receiving DOJ
22 permission because, as you know, we have to get them to our
23 subpoena attorneys.

24 Mr. Pelletier has acknowledged receipt for both him
25 and Mr. Williams although Mr. Williams doesn't want to be

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1 sequestered from the courtroom. So they then retracted the
2 acceptance of the subpoena and I explained he had to be
3 sequestered regardless. So I need to call Mr. Pelletier
4 tonight and us straighten that out.

5 We've separately received authorization and have
6 attempted to serve subpoenas or served subpoenas on a variety
7 of witnesses from whom the texts were collected; based, again,
8 on our review of the text, not because anyone told us but it's
9 easy to triangulate who it came from just by looking at the
10 messages themselves. So we sort of have all of these various
11 people teed up and ready to go potentially.

12 THE COURT: But your expectation as to any
13 invocation is exactly what with respect to the three people;
14 put aside the people whose texts they are?

15 MS. FARRELL: That they would invoke the work
16 product privilege over answering specific questions around
17 where these materials came from -- from whom they came from.

18 THE COURT: But none of these individuals you expect
19 to invoke a privilege against self-incrimination; correct?

20 MS. FARRELL: I have asked that question and have
21 not been informed that any of them will do so.

22 THE COURT: Because they are simply being offered up
23 by the company as essentially a custodian.

24 MS. FARRELL: That's correct. I would want -- it
25 would not shock me if someone changed their mind about that.

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1 And, so -- and obviously it's their Constitutional right to do
2 so.

3 So, my current understanding is nobody -- none of
4 these three lawyers will be invoking their Fifth Amendment
5 right, but that doesn't mean it will not happen.

6 MS. BONJEAN: I think we're all on the same page.
7 We would all want to know that before there's a jury in the
8 room.

9 THE COURT: I would certainly not have anybody
10 invoking in front of a jury, but they would have to invoke in
11 advance.

12 MS. BONJEAN: We will know in advance.

13 MS. FARRELL: I will attempt to get full clarity on
14 that from Mr. Pelletier. The other person that OneTaste had
15 offered up as somebody who could authenticate the text
16 messages is Mr. Block.

17 THE COURT: Right, and you said the other day --

18 MS. FARRELL: He will invoke. We are prepared to
19 deal with that if we call him instead.

20 THE COURT: Or immunize him.

21 MS. FARRELL: Or immunize him for this particular
22 testimony.

23 THE COURT: But is it your understanding that
24 separate from any Fifth Amendment privilege, he would also
25 assert work product?

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1 MS. FARRELL: That's correct, Your Honor.

2 So I think from our perspective the work product
3 assertion -- if the option is not to call a member of the U.S.
4 Attorney's Office to authenticate materials under the active
5 production document having received the material, then we have
6 to address -- the work product assertion has to be resolved.

7 THE COURT: Yes, so, let me understand the scope of
8 what you intend to do if you do it through a U.S. Attorney's
9 Office employee.

10 MS. FARRELL: We would call someone to testify to
11 the fact that a subpoena was served and that these two or
12 three productions were received by the U.S. Attorney's Office.
13 They were saved here. These specific documents that are now
14 marked as Government -- I'm making up the numbers, but are
15 marked as Government 1 through 200 are text message chains
16 that were received from OneTaste and stored in the U.S.
17 Attorney's offices.

18 THE COURT: So they were received pursuant to a
19 subpoena; correct?

20 MS. FARRELL: That's correct.

21 THE COURT: By grand jury subpoena or --

22 MS. FARRELL: Grand jury.

23 THE COURT: And you would be seeking to offer what
24 the subpoena called for, I take it?

25 MS. FARRELL: Yes, with respect to the text

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1 messages.

2 THE COURT: Okay. I would like to see the --

3 MS. FARRELL: It's like a proffer of --

4 THE COURT: A proffer of --

5 MS. FARRELL: -- what that person would testify to.

6 THE COURT: Yes, yes.

7 MS. FARRELL: Understood. We can provide that.

8 Thank you.

9 THE COURT: And let me just, on that same issue, as
10 for the people whose texts these are, I've looked at some of
11 this but it's a big binder you gave me.

12 Approximately how many people are there?

13 MS. FARRELL: Nine.

14 THE COURT: Okay. And are there any that you think
15 could be available sooner rather than later?

16 MS. FARRELL: There are some that have been served.
17 There are some that we may need to seek material witness
18 warrants for, given our attempts. We feel at this point we've
19 exhausted our attempts to serve them subpoenas. Some of them
20 obtained counsel who have not yet accepted. Some of them
21 literally contacted us today saying we represent so-and-so, so
22 they may. There's nine people in varying states of service or
23 non-service. So we may have to seek material witness warrants
24 if it doesn't get frankly resolved tonight. Nine people --
25 our preference would be not to call nine witnesses, but we'll

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1 do it if we have to get them in.

2 MS. BONJEAN: And just to flag for the court, these
3 are -- our position is these text messages are very piecemeal.
4 We're going to be obviously likely objecting at least to a
5 bunch of them on sort of completeness. I'm sure there's
6 hearsay in --

7 THE COURT: Is there anything you're not going to be
8 objecting to?

9 MS. BONJEAN: There might be. I can't rattle them
10 off from the top of my head, but if you've seen them --

11 THE COURT: I have.

12 MS. BONJEAN: -- they're very -- I wasn't around
13 when they got produced and I don't know how they got produced,
14 but they are -- from a very objective standpoint, they are --
15 they're disjointed, they're not complete and --

16 THE COURT: As I understood from the Government last
17 week or before that, the Government is only seeking to,
18 through either a U.S. Attorney's Office employee or someone
19 from OneTaste, essentially authenticate that they were what
20 was produced to the Government from OneTaste pursuant to a
21 subpoena. There's still issues of relevance, et cetera;
22 right?

23 MS. FARRELL: Correct.

24 (Continued on the next page.)

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1 (Continuing...)

2 THE COURT: Okay.

3 MS. FARRELL: We want to establish their
4 authenticity.

5 And then with respect to relevance, hearsay --

6 THE COURT: Well, when you say authenticity, you
7 mean -- I mean, I think what you established is that this is
8 what was produced to you from OneTaste, correct?

9 MS. FARRELL: Correct. In that they are what they
10 appear to be, which is text message chains, including the
11 participants whose names appear on the messages.

12 THE COURT: And you're purporting to do that or
13 proposing to do that based on what was called for by the
14 subpoena and what the response was, correct?

15 MS. FARRELL: Correct, Your Honor.

16 THE COURT: Okay. That's what I understood.

17 And this issue of disjointedness that Ms. Bonjean is
18 raising, how are you intending to address that sort of more
19 substantive content-based argument?

20 MS. FARRELL: Our view is that -- and I think the
21 law's view is that that goes to the weight, not the
22 admissibility. That's obviously information that they can
23 cross-examine the custodian on, or argue in front of the jury
24 on --

25 THE COURT: Okay. But you're saying that there

1 is -- potentially, your number one option is that -- there's
2 no custodian then, right? It is a US Attorney's Office
3 employee?

4 MS. FARRELL: Yes.

5 THE COURT: So what do you mean they can
6 cross-examine on that? I am talking about the content now.

7 MS. FARRELL: Right. They won't be able to
8 cross-examine -- I mean, let me give you an example.

9 THE COURT: Yes.

10 MS. FARRELL: There are some that are between the
11 two defendants, which are clearly nonhearsay because it's the
12 two defendants' statements. And, obviously, neither of the
13 defendants is going to take the stand in the government's case
14 and authenticate these, but that does not mean that the
15 government or anyone else can never get documents in that
16 involve communications solely between two defendants or a
17 defendant and coconspirators.

18 The authenticity is established by the fact that
19 they were produced by the company in response to a subpoena
20 because the company is not going to produce fake documents in
21 response to --

22 THE COURT: But that's what I am asking for what the
23 subpoena called for.

24 MS. FARRELL: Understood, Your Honor.

25 And so, look. The defense can argue, when I say it

1 goes to the weight, not the admissibility, that's something
2 the defense can argue in summation. They can cross-examine
3 any sort of -- if not the US Attorney's Office witness or even
4 the document custodian about those documents, they can -- you
5 know, cross-examine percipient witnesses about observations
6 around how texts were used, how they were stored, et cetera,
7 et cetera.

8 THE COURT: So at the time that OneTaste produced
9 these documents pursuant to the subpoena, they didn't assert
10 any work product protection or any other privilege, I take it;
11 is that correct?

12 MS. FARRELL: Not over these materials, because they
13 were produced -- I would have to go back and double-check the
14 cover letters, but I --

15 THE COURT: I think you should do that.

16 MS. FARRELL: I will. But there, you know, there's
17 obviously no work product protection over materials that were
18 produced.

19 THE COURT: Yeah. What I am getting at is was this
20 argument made to the government about any protection for these
21 materials before the subpoena was complied with?

22 MS. FARRELL: I do not believe so, Your Honor.

23 THE COURT: Okay.

24 MS. BONJEAN: I think -- am I wrong, though, that
25 the text messages failed to identify those -- who -- so they

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1 may not have voiced objection, but they didn't actually
2 produce the identities of people --

3 THE COURT: Correct.

4 MS. BONJEAN: Right. Okay.

5 THE COURT: You're correct. Yes.

6 MS. BONJEAN: I mean, I don't --

7 THE COURT: Right. I am asking a different
8 question.

9 MS. BONJEAN: There was no motion to compel on that,
10 as far as I know. I'm just saying, I don't --

11 THE COURT: That's why I want to see what the
12 subpoena called for.

13 Okay. I think we can continue this. You can be
14 here at 9:15 tomorrow, if there's anything to take up. But on
15 the video issue, because Ms. Bonjean makes the very valid
16 point that she's not going to be able to on the fly kind of --
17 well, you're not going to be able to on the fly, Ms. Bensing,
18 edit things, and she may not have the time to be able to get
19 you an answer quickly enough. Do I have that right?

20 MS. BONJEAN: Yes. But I'm going to try to go -- to
21 deal with it.

22 THE COURT: Okay. And she's not going to be writing
23 in response to your motion to preclude that impeachment.
24 But -- so she'll have an extra half an hour or so.

25 Okay. Thanks, all.

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1 I will see everyone at 9:15.

2 And thank you for, Mr. Robotti, I think it was, for
3 the transcripts. I think that is a much quicker way to get
4 through some of these videos, if you are using them to
5 refresh.

6 MR. ROBOTTI: The only issue sometimes, Judge, we
7 are pulling out excerpts that are in response to the direct.
8 So we'll get them to you as quickly as we can.

9 THE COURT: That's okay. I think as long as we are
10 not talking about very lengthy videos that you are expecting
11 me to look at on a ten-minute break.

12 MR. ROBOTTI: Thank you.

13 THE COURT: Okay. Have a good night, everyone.

14 MS. FARRELL: Thank you.

15 (At 5:52 p.m., proceedings were adjourned until
16 Wednesday, May 14, 2025, at 9:15 a.m.)

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