

1 Q Did you have an understanding as to why India said that?

2 A Yes.

3 Q What's your understanding?

4 A My understanding is that I was basically being put on  
5 display for Keith and it was an opportunity for him to see how  
6 I'm looking.

7 Q Shortly after this self-care assignment that you received  
8 to make yourself up, did Allison contact you and tell you that  
9 she had to discuss something important with you?

10 A Yes.

11 Q What did she say?

12 A She basically called me and said, hey, I want to talk to  
13 you about something. It's really important. I'm going to  
14 call you, like, later this week.

15 Q And did she call you?

16 A Yes.

17 Q And what did she say?

18 A First she prefaced it with, You've been doing so great.  
19 Everyone in the community loves you. You've been so amazing.  
20 She asked me about the self-respect, self care-assignments and  
21 she's, like, Yes, you know just with the bra thing you need to  
22 be more discrete and we need to -- we're special so how we  
23 dress is really important. And then she prefaced that and  
24 segued into -- she said, well, me and India have been talking  
25 and we wanted to give you this special assignment. It's an

1 honor and a privilege. It's something that you need to be  
2 very discrete with and me and India have both done this  
3 assignment -- and at this point my Spidey senses are going  
4 off, and she said that the assignment is for me to seduce  
5 Keith and have him take a naked picture of me and send it to  
6 India to prove that I did it.

7 Q And what was your reaction?

8 A I basically -- like, my mind was just blown. It was like  
9 my whole world was crumbling. It was basically my worst  
10 nightmare come to life because, like, what would be the worst  
11 thing? Like, I joined this thing. I think it's so great and  
12 people would warn me, Oh, you've got to be careful and the  
13 worst thing would be that it was a cult and I would -- and of  
14 course wanted to sleep with me and that's what that was.

15 Q Were you told that other women had done this?

16 A Yes, that only privileged women that had the honor of  
17 that assignment, had been given that.

18 Q Were you supposed to keep the assignment a secret?

19 A Yes.

20 Q Who told you that?

21 A Allison.

22 Q This is during a phone call; is that right?

23 A Correct.

24 Q Where was Allison?

25 A In San Diego.

1 Q So did you -- what was your response to Allison when she  
2 gave you this assignment?

3 A Well, I was in shock. And I was really uncomfortable so  
4 I was trying to find the words and I was like, I -- I don't  
5 understand. Like, what is this for? And she said, well,  
6 you -- this is going to help you get rid of all of your sexual  
7 abuse trauma and I was like, I don't understand. Like, I'm  
8 still in love with my ex-boyfriend. This makes me really  
9 uncomfortable and I said, Does Keith know about The Vow? And  
10 she said no.

11 And at this point I am still feeling that's super  
12 weird, like, why would I use Keith to do this thing, you know,  
13 isn't he going to think this is weird? And she said, Just say  
14 it's the most vulnerable thing you could do.

15 Q Did you discuss with Allison the issue of celibacy?

16 A Yes.

17 Q What did she say?

18 A Well, when I was pushing back and seeing my confusion and  
19 uncomfortability (sic) with it, she said, well, you're  
20 celibate anyway and what's one person? After I said I was  
21 still in love with my ex-boyfriend and I -- I was pushing back  
22 and then she said, well, don't you still feel like you have  
23 disintegrations around your sexual abuse and around men? And  
24 so for me I just said -- I said, yeah, I guess. She said,  
25 well, this is how you're going to get rid of all of those.

1           So in that moment, I realized that I didn't have an  
2 option. I realized this is something that she expects me to  
3 do. So, I internally basically I feel like I went kind of  
4 like a double agent; that I needed to get -- pardon my French,  
5 that I needed to get the fuck out of there. So I just kind of  
6 softly pretended to go along with it so I could plan my  
7 escape.

8 Q     How did the call end?

9 A     The call ended with Allison -- first she said, You can  
10 talk to India about her experience. You know, you can call me  
11 and ask me any questions and before she ended the call she  
12 said, And I give you permission to enjoy it.

13 Q     During this conversation were you thinking about your  
14 collateral?

15 A     Yes.

16 Q     How?

17 A     I was just thinking about all the collateral that they  
18 had on me and, like, well, what was I going to do. I needed  
19 to get out of this situation and what are they going to do  
20 with my collateral.

21 Q     When Allison gave you permission to enjoy it, what was  
22 your reaction?

23 A     Again, sorry pardon if I curse, but internally I was just  
24 like, you fucking bitch. I was horrified and enraged with the  
25 fact that she would try to re-traumatize me and say that doing

1 something sexual with someone that I obviously didn't want to  
2 do that with would heal my sexual trauma. I was disgusted.

3 Q So, what was -- just to be precise, what was your  
4 understanding of the assignment that Allison gave you?

5 A My understanding of the assignment was to seduce Keith  
6 which she mentioned in the conversation, that since it has to  
7 be discrete I needed to send him notes and send him pictures.  
8 No one finds out, but that the seduction process ending up  
9 with me doing sexual things and having sex with him and having  
10 him take a photo of me obviously to blackmail me to then send  
11 it to India.

12 Q Why did you think you were supposed to have sex with the  
13 defendant?

14 A There was a number of reasons why I felt that way. One  
15 of them, she stated the thing about celibacy. Obviously, I  
16 give you permission to enjoy it, which wouldn't make sense.  
17 Okay, to seduce someone. That's just a word. That's a  
18 seduction, an action; to seduce someone with the intention to,  
19 like, do sexual things with them.

20 So, that is one of the actions, but with the  
21 intention to complete that assignment. So, yeah, it just --  
22 all of it felt like that's what it was. Have me have sex with  
23 him. Seduce him, have sex with him and then also, enjoy the  
24 seduction process. She knew about my prior sexual history,  
25 that I was trying to deal with certain areas and I felt she

1 was using that against me and thinking that I would go along  
2 that route.

3 Q What happened after you got off the phone with Allison?

4 A Well, I was in my room in the basement and I just felt  
5 like the walls were spinning. I just felt like the whole room  
6 was spinning. I, like, was dizzy. I, like, almost blacked  
7 out and, shortly after, I get on my laptop and I just start  
8 Googling everything. Mind you, I had done all of this  
9 Googling stuff before, but there was always an answer or a  
10 reason to, like, the bad things online. But I went deeper in  
11 the Google search and then I saw this thing where it mentioned  
12 something about him having a harem and I was just like, oh my  
13 God, this is true. Like, this is all true. And I just  
14 basically started planning my escape.

15 Q So, you had done some internet research previously?

16 A Yes.

17 Q And who did you discuss that research with?

18 A India.

19 Q And what did India say?

20 A It was before I even took the five-day and there was a  
21 lot of, like, bad press on the internet. So I asked India, I  
22 was like, hey, there's all of this weird stuff on the  
23 internet, what's up with that? And basically her main story  
24 was that there was someone who, like, a son of a very  
25 prominent media family who took the intensive and then

1 realized that his family business was unethical. So then the  
2 parents were angry and did a smear campaign. India also said,  
3 it's so funny because all of these people that were saying  
4 these bad things, it was reported that they had child  
5 pornography.

6 Q So after receiving the special assignment, this  
7 assignment to have sex with the defendant, did you talk with  
8 India about it?

9 A Yes.

10 Q What did the two of you discuss?

11 A Well, I saw her the following day and I was just, like,  
12 hey, I got that special assignment. Oh, okay, how do you feel  
13 and I was like, you know, it's kind of -- like, I don't really  
14 know. Like, I wanted to ask is you, like, what was your  
15 experience like. What did you do and what was it. And she  
16 said that she didn't really want to tell me about her  
17 experience. She wanted me to have my own experience, but she  
18 just said that it was amazing. And that Keith's body was --  
19 he's like surprisingly more fit as well as the fact that he  
20 liked to be pursued. He kind of likes to play hard to get.  
21 So you'll figure it out.

22 Q What was your reaction to India's comments?

23 A I kind of just looked at her, like, not like she was  
24 crazy but, like, you know, like -- you know, I found it very  
25 strange and I felt bad for her.

1 Q Did you have suspicions that other women in the NXIVM  
2 community were having sexual relationships with the defendant?

3 A I'm sorry, can you repeat that?

4 Q Did you have suspicions that other women in the NXIVM  
5 community were having sexual relationships with the defendant?

6 A Yes.

7 Q Who?

8 A Allison, as well as Nicole.

9 Q So after receiving the assignment, doing the internet  
10 research, talking to India, did you make any decisions as to  
11 what were you going to do regarding The Vow?

12 A Yes.

13 Q What did you decide?

14 A Well, I decided first and foremost I needed to get out of  
15 Albany and also that I needed to protect myself along with  
16 certain people that were in there that I cared about.

17 Q And so what did you do?

18 A So, I knew I had to play along. Thankfully I had a  
19 family trip to Mexico planned that they were already aware of  
20 that was going to be coming up shortly so I just knew that I  
21 had to play along for a little bit. Also, because I had  
22 access to the Dropbox and other peoples' collateral, I decided  
23 to take screenshots of the other peoples' collateral.

24 Q And, so, the screenshots of the Dropbox folder itself  
25 that we previously discussed, was that part of the screenshots

1 that you took?

2 A That was part of it.

3 Q What was your time frame? How long did you have before  
4 your trip to Mexico?

5 A Just a few weeks.

6 Q And during that time period did you have contact with the  
7 defendant?

8 A Yes.

9 Q Could you describe that, please?

10 A Yes. Mostly it was just messaging. So I would -- in the  
11 conversation I would send, like, a heart or, like, a heart  
12 face and things like that.

13 Q How did you think you could go a few weeks without  
14 completing the assignment?

15 A Because I had the original pushback, I already knew -- I  
16 felt like, okay, they're not going to push on me to, like,  
17 complete this right now because I'm in a fragile state along  
18 with the lines that he likes to be pursued which would  
19 obviously take a little bit more time.

20 Q So, you mentioned you took out of the Dropbox other  
21 collateral?

22 A Correct.

23 Q So why did you do that?

24 A I did that to protect myself and to, as insurance that if  
25 they tried to blackmail me, that I would have some leverage to