

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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NXIVM CORPORATION, formerly known as  
EXECUTIVE SUCCESS PROGRAMS, INC. And  
FIRST PRINCIPLES, INC.,

No. 2:06-cv-01051

Plaintiffs, (DMC/MF)

vs.

MORRIS SUTTON, ROCHELLE SUTTON, THE  
ROSS INSTITUTE, RICK ROSS a/k/a "RICKY"  
ROSS, STEPHANIE FRANCO, PAUL MARTIN,  
Ph.D., and WELLSRING RETREAT, INC.,  
Defendants.

-----\*  
RICK ROSS,  
Counterclaim-Plaintiff,

vs.

KEITH RANIERE, NANCY SALZMAN,  
KRISTIN KEEFFE INTERFOR, INC.,  
JUVAL AVIV, ANNA MOODY, JANE DOE  
and JOHN DOES 1-10,

Counterclaim-Defendants.

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(Caption continued on following page)

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF: KEITH A. RANIERE  
(Volume II)

DATE TAKEN: THURSDAY, MARCH 12, 2009

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21 Nancy Salzman  
22 Rick Ross  
23 Karl Petry, Videographer  
24  
25

1 (Continued)

2 INTERFOR, INC., JUVAL AVIV, and  
3 ANNA MOODY,

4 Cross-Claimants,

5 vs.

6 NXIVM CORPORATION, KEITH RANIERE,  
7 NANCY SALZMAN and KRISTIN KEEFFE,  
8 Cross-Claim Defendants.

9 -----\*  
10 T R A N S C R I P T of the stenographic

11 notes of the proceedings in the above-entitled  
12 matter, as taken by and before CHERYL McGANN, a

13 Certified Court Reporter and Certified Realtime

14 Reporter of the State of New Jersey, held

15 at the offices of DRINKER BIDDLE & REATH LLP,

16 500 Campus Drive, Florham Park, New Jersey, on

17 Thursday, March 12, 2009, commencing at

18 9:44 a.m.

19 A P P E A R A N C E S :

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1 I N D E X  
2 WITNESS DIRECT CROSS REDIRECT  
(Continued)

3 KEITH ALAN RANIERE  
4 By Mr. Kofman: 169  
By Mr. Landy: 285  
By Mr. Skolnik: 345

5 E X H I B I T S

6 Exhibit Description For Identification

7 Raniere-11 Affidavit of Keith Ranieri signed  
8 August 22, 2003, with Exhibits 208

9 Raniere-12 First Principles' Third Amended  
Responses to Defendant Stephanie  
10 Franco's Second Set of Interrogatories  
to First Principles 239

11 Raniere-13 12 Point Mission Statement Bates  
12 stamped SF 00329 245

13 Raniere-14 3/1/04 five-page memorandum to K.  
Raniere, N. Salzman from J. O'Hara 251

14 Raniere-15 Student Enrollment Application for  
15 Aaron Kassir 264

16 Raniere-16 Keith Ranieri's Responses to Defendant  
Rick Ross' First Amended Set of  
17 Interrogatories to NXIVM 324

18 Raniere-17 Excerpt From Audio Recording of Meeting  
Among Rick Ross, Juval Aviv, and Lynne  
19 Friedman on November 23, 2004 330

20 \* \* \*  
21 (Exhibits attached.)

22 INFORMATION REQUESTED

23 (Request.) Page 215

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24 (Request.) Page 222

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25 (Request.) Page 281

1 THE VIDEOGRAPHER: Today's date is March 12, 2009.  
2 This is the start of Tape 1 of the second day of the  
3 continuing deposition of Keith Raniere. The time is  
4 9:44, and we are now on the record.

5  
6 KEITH ALAN RANIERE, residing at  
7 3 Flintlock Lane, Clifton Park, New York 12065,  
8 is duly sworn and testifies on his oath as follows:  
9

10 CONTINUED DIRECT EXAMINATION BY MR. KOFMAN:

11 Q. Good morning, Mr. Raniere. The rules that I  
12 told you at the beginning of the deposition  
13 yesterday are still in effect.

14 Do you need me to repeat those for you?

15 A. No.

16 Q. Okay. Mr. Raniere, has Morris Sutton taken  
17 any action since the filing of the lawsuit to  
18 discredit NXIVM?

19 A. I don't know.

20 Q. Okay. Has Rochelle Sutton taken any action  
21 since the filing of the lawsuit to discredit NXIVM?

22 A. I don't know.

23 Q. Has Stephanie Franco taken any action  
24 subsequent to the filing of the lawsuit in August  
25 2003 to discredit NXIVM?

1 reveal all the things relating to B and all the  
2 things relating to B -- C. Certainly as a group we  
3 can reveal a trade secret. Certainly as an essay,  
4 although a trade secret may not be contained in any  
5 one segment, it provides more and more of a window  
6 so it's something that I would have to think about  
7 in each case.

8 Q. Do you think that your marking up of  
9 Raniere-5 and Raniere-6 you identified things that  
10 you now believe are not trade secrets, or is it the  
11 case that you --

12 A. Did not mark enough --

13 Q. -- didn't mark up things that you consider  
14 are trade secrets?

15 A. Probably did not mark enough, maybe should  
16 have marked more. Each of the things have to be  
17 weighed very carefully, so I may have marked some  
18 things that are not.

19 I will give you an example. There are quotes  
20 in these articles from other people, other things.  
21 The question is can you use a quote from another  
22 person to reveal a secret. Can I -- if I have a  
23 math equation, can I use an equation from another  
24 mathematician to reveal a secret; and the answer is  
25 yes. So I have to weigh specifically how each of

1 A. Um, I'm not sure.

2 Q. Yesterday before we broke you had -- I had  
3 asked you to mark up the article that we've marked  
4 as Raniere-8, Critical Analysis of the Executive  
5 Success Programs Inc., to identify everything that  
6 you considered a trade secret of NXIVM.

7 Have you done that?

8 A. Yes, with a comment.

9 Q. What's the comment?

10 A. As I was doing it, I am having a different, I  
11 would say deeper understanding of the issue, so I  
12 can't say that on the previous articles that I  
13 marked up that I've yet marked them appropriately  
14 ultimately. I think to do a -- this full justice, I  
15 would need to not only think about it but go through  
16 each one very carefully over time. And I can give  
17 you specifics of why.

18 Q. If you can give me a specific as to why you  
19 would have to do that.

20 A. Because when you have -- if I have some sort  
21 of a trade secret -- let's say it's some sort of a  
22 math formula involving A, B and C, and I go and I  
23 give that trade secret formula to several people,  
24 and I have one person reveal A and another -- all  
25 the things relating to A -- and another person

1 these quotes are used, and it starts to become more  
2 than just sitting casually or at a deposition  
3 formally and quickly marking off. For me, it is --  
4 it is a thought process.

5 Q. How long do you think it would take you to  
6 identify all of the trade secrets that are disclosed  
7 in Raniere-5?

8 A. I think it depends how motivated I was. If I  
9 was a motivated competitor, it might take me a year,  
10 but I'd figure it out.

11 Q. You would be able to replicate the Rational  
12 Inquiry -- the NXIVM courses from simply this one  
13 article?

14 A. I might be able to replicate a trade secret  
15 from one or more of the articles, and I can't tell  
16 you that, per se.

17 Q. So you might be able to replicate a single  
18 trade secret from one of the articles if you took a  
19 year?

20 A. Or more. Or more.

21 Q. But it might take a year if you were  
22 motivated?

23 A. Or it might take a night. I don't know.  
24 What I'm saying is it's a far deeper process than  
25 my on reading the article just checking off yes, no,

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1 yes, no, yes, no.  
 2 Q. Okay. How long would it take you, Keith  
 3 Raniere, to perform a more detailed analysis to  
 4 identify each and every trade secret disclosed in  
 5 Raniere-5?  
 6 A. I have no way of knowing that.  
 7 Q. Hours, days?  
 8 A. You're asking how long it would take me to  
 9 solve a problem that I don't know the solution of.  
 10 I don't know.  
 11 Q. It's a three-page article, Mr. Raniere. How  
 12 long would it take you to identify each trade  
 13 secret?  
 14 A. It's a three-page article that provides a  
 15 window into 30 years of my life of work. I don't  
 16 know.  
 17 Q. You understand in this case NXIVM is going to  
 18 have to identify each trade secret?  
 19 A. Yes, but not necessarily how the trade secret  
 20 is specifically represented in the article. I  
 21 believe it's do the articles/article, however you  
 22 look at them, release the trade secrets to  
 23 competitors. Do they -- or are those trade secrets  
 24 used to damage NXIVM. And I don't understand the  
 25 level -- that's my understanding of it, and that's a

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1 different question than does this sentence contain  
 2 a trade secret, at least in my mind. So I went  
 3 through this, and I apologize that it may not be as  
 4 complete.  
 5 Q. Okay. But to the extent it's not complete,  
 6 it's more likely underinclusive than overinclusive  
 7 of trade secrets?  
 8 A. More likely.  
 9 Q. How about the third article? Did you -- does  
 10 that identify -- and this is what you did last  
 11 night, Raniere-8.  
 12 A. That's the one I'm speaking of, yes.  
 13 Q. Does that identify each and every trade  
 14 secret that's contained in the article?  
 15 A. No. It just starts with an overview. I  
 16 spent, I don't know, 15 minutes, a half hour going  
 17 through, as I did the other articles with about the  
 18 same level of precision; but even with this article  
 19 I learned more as I was doing it.  
 20 Q. Did anyone assist you in marking up or  
 21 identifying trade secrets in Raniere-8?  
 22 A. No.  
 23 Q. Mr. Raniere, is any entire trade secret of  
 24 NXIVM, as you define the term, disclosed in these  
 25 articles -- in any one of these articles?

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1 A. I don't know.  
 2 Q. And that's after having spent some time  
 3 yesterday reviewing the articles?  
 4 A. Yes.  
 5 Q. Let's go back to Raniere-5.  
 6 A. (Witness complies.)  
 7 Q. The next to last paragraph there you say  
 8 "Participants are told to promise not to tell non-  
 9 participants of what they learn in the Intensive, as  
 10 well as its methods," and you underlined that.  
 11 A. You have to show me that. It's the very last  
 12 page where --  
 13 Q. No. It's the first page of Raniere-5, next  
 14 to last paragraph, under the heading "Limitations in  
 15 ability to get feedback from friends and family."  
 16 A. Uh-huh.  
 17 Q. And it says, "Participants are told to  
 18 promise not to tell non-participants of what they  
 19 learn in the Intensive, as well as its methods."  
 20 What is unique to NXIVM about that concept?  
 21 A. Please repeat the concept. I'm having  
 22 trouble finding.  
 23 Q. Okay. It's -- the heading is "Limitations in  
 24 ability to get feedback from friends and family."  
 25 A. I'm not seeing -- it's Page 1?

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1 Q. Page 1.  
 2 A. I see. So it's the paragraph above the last.  
 3 Q. And you underlined part of the sentence,  
 4 "Participants are told to promise not to tell  
 5 non-participants of what they learn in the  
 6 Intensive, as well as its methods."  
 7 A. Uh-huh.  
 8 Q. What about that sentence is unique to NXIVM?  
 9 A. "Methods" right off.  
 10 Q. The word methods is unique?  
 11 A. No, NXIVM's methods; and this brings the  
 12 methods not only into question but starts to carve  
 13 out aspects of or not of the methods.  
 14 Q. Does it disclose any of the methods?  
 15 A. I believe indirectly it does. It starts to.  
 16 Q. How?  
 17 A. I think when you have a trade secret, as  
 18 Mr. Hochman did, you are in a different position  
 19 than if you don't. And if I start to say things  
 20 about the trade secret that I have and I have the  
 21 trade secret, so to speak, everything starts to  
 22 either hint or directly say.  
 23 Now, he's talking about the methods, the  
 24 trade secrets that he has in his hand. He's  
 25 starting to go and say, all right, well, it's sort

1 of like this, sort of not like this. So I find it  
2 related to our methods, and I find our methods trade  
3 secrets.

4 Q. Could --

5 A. I'm sorry.

6 Q. Could a competitor take that sentence and  
7 replicate or discover any of your trade secrets?

8 A. Utilizing that sentence in combination with  
9 other things, I believe so.

10 Q. Doesn't that sentence merely say that you  
11 have methods?

12 A. No. It says actually more than that, too.  
13 It talks about a promise. It talks about an  
14 Intensive and that the Intensive does have methods,  
15 which sometimes methods are not trade secret;  
16 sometimes they are.

17 Q. Is the promise to keep things secret unique  
18 -- to keep information secret unique to NXIVM?

19 A. No.

20 Q. Is there anything about the existence of that  
21 promise to -- strike that.

22 Are you aware of any competitors who have  
23 similar promises?

24 A. Not directly, but I'm sure they do.

25 Q. Uh-huh. Does disclosure of the fact that

1 NXIVM requires its information to be kept secret --  
2 strike that.

3 Would disclosure to a competitor of the fact  
4 that NXIVM requires its methods to be kept secret  
5 work a competitive disadvantage on NXIVM?

6 A. It may, depending on the context.

7 Q. A competitor learns that NXIVM won't --  
8 doesn't allow its participants to reveal the trade  
9 secrets. How does that work a competitive  
10 disadvantage on you?

11 A. If I am a person that is looking to find the  
12 trade secrets of an organization or if I am a person  
13 that is a competitor of the organization and has the  
14 trade secrets, I could use those trade secrets to,  
15 in fact, take business away from NXIVM, to cause  
16 harm to NXIVM or I could use the hints in part to  
17 derive.

18 Q. How does learning that NXIVM prohibits  
19 disclosure of its trade secrets benefit a  
20 competitor?

21 A. I don't know off the top of my head. I --  
22 you know, it's similar -- if the equation is A plus  
23 B plus C, that is my trade secret, and many  
24 competitors have A in their equation. Any formula,  
25 a chemical formula, say, has carbon in it. Many

1 trade secret formulas probably have carbon in it.  
2 To say that the formula has carbon in it, a lot of  
3 competitors have carbon in their formula, but it is  
4 significant when I know the trade secret and I say  
5 the formula has carbon in it. It starts to craft  
6 out information.

7 And can I contemplate what every person,  
8 every competitor looking at this will be able to  
9 derive from it? That would take a lot of time, and  
10 I don't know if I could even necessarily do that.

11 Q. Let's assume that your trade secret was a  
12 cake. Is -- somebody saying that the cake contains  
13 eggs, is that a disclosure of a trade secret?

14 A. It can be partway to one, especially if the  
15 eggs are in the recipe.

16 Q. If the eggs are in the recipe, okay.

17 By the way, is there anything that's  
18 contained in the NXIVM Intensive, any of the modules  
19 that have been created for the NXIVM Intensive that  
20 are not trade secrets?

21 A. The modules is a combination of the product  
22 of the tool and the tool itself. Are there any  
23 modules in NXIVM that do not -- are not related in  
24 any way to the trade secret? I don't think so.

25 Q. Is there anything within an individual module

1 that -- any part of an individual module that's not  
2 a trade secret?

3 A. Do you know, I can't say that off the top of  
4 my head. I can't think of one. Part of the  
5 philosophy is we wouldn't create the modules;  
6 someone else would.

7 Q. I'm sorry. Could you repeat that?

8 A. Part of the philosophy of it is if they  
9 weren't valuable to us, we wouldn't create them;  
10 someone else would.

11 Q. On the last paragraph of this page, it says  
12 "Participants are mislead" -- you underlined,  
13 "Participants are mislead into feeling guilty for  
14 being a 'promise breaker.'"

15 A. Uh-huh.

16 Q. What's unique to NXIVM about that concept?

17 A. Well, it does raise a question. Are  
18 participants made to feel guilty? I think the way  
19 we understand guilt is unique. I think the way it  
20 is handled within the curriculum is unique and  
21 important and secret, and also I believe the  
22 statement is untrue and I think raises the question  
23 that either it makes us look bad or we have to start  
24 to reveal a trade secret, which is an interesting  
25 thing when you don't get to publish.

1 Q. Consid -- is there something in that sentence  
 2 that would tell a competitor what your ideas of  
 3 guilt are?  
 4 A. I think there are things in that sentence  
 5 that, one, a competitor would understand that  
 6 certain characteristics relating to the NXIVM trade  
 7 secrets and relating to NXIVM; and, two, it would  
 8 put a potential client and other competitors in a  
 9 position where either -- especially when you talk  
 10 about our clients -- either they believe something  
 11 wrongfully about us by someone who has the authority  
 12 of having our trade secret or we have to reveal a  
 13 trade secret to explain.  
 14 You see, we do not have the right to first  
 15 publication in this case. So although it may seem  
 16 like a criticism, this particular article, it's  
 17 criticizing something that doesn't exist for the  
 18 public yet so we're -- it's a type of forced  
 19 publication almost or a damage.  
 20 Q. You said it doesn't exist for the public yet.  
 21 Is there a plan to have this -- eventually have the  
 22 modules made public?  
 23 A. I don't know.  
 24 Q. Would a -- would some potential student who  
 25 read these articles be able to say, I don't need to

1 important, and understanding comprehensibility is  
 2 important. I think this starts to say what trade  
 3 secrets are. That's a part. That's not the whole  
 4 thing. The whole trade secret isn't there, no.  
 5 Q. Is any trade secret there?  
 6 A. I believe that there is part of a trade  
 7 secret there, the beginnings. I think that that,  
 8 if used in an appropriate context, could ascertain  
 9 trade secrets.  
 10 This is a person who has our trade secret.  
 11 They're writing from that perspective with a group  
 12 of other people.  
 13 Q. So somebody saying I've read the materials,  
 14 they're gibberish, reveals a trade secret?  
 15 A. Well, it either reveals part of a trade  
 16 secret if it's true or if it's false it puts it in  
 17 a position where we either have to reveal the trade  
 18 secret to capture whatever market we want or be  
 19 damaged by it.  
 20 Q. But that's a difference between whether it's  
 21 true or false, as opposed to whether it discloses a  
 22 trade secret. The fact that somebody says it's  
 23 gibberish may be true, may be false, may be  
 24 somebody's opinion but how does -- how does saying  
 25 that it's a bunch of nonsense allow anyone to get a

1 take the course now because I learned everything I  
 2 need from these three articles?  
 3 A. They might say that.  
 4 Q. Would they get the gist of NXIVM's programs  
 5 from reading these three articles?  
 6 A. I don't know.  
 7 Q. Top of the second page, under Effect of  
 8 idiosyncratic vocabulary on communications, you  
 9 underlined the phrase --  
 10 A. Hold on. I'm trying to find it.  
 11 Second page. What paragraph? Effect -- oh,  
 12 it's the first paragraph.  
 13 Q. First full paragraph.  
 14 A. Thank you.  
 15 Q. You underlined the phrase, "English words are  
 16 redefined to fit the peculiar meanings of group  
 17 leaders."  
 18 A. Uh-huh.  
 19 Q. "The result is communications that are near  
 20 incomprehensible to outsiders."  
 21 Does that sentence -- that sentence doesn't  
 22 appear in any of NXIVM's modules, does it?  
 23 A. One of our important things is to understand  
 24 the meanings of words going from surface structure  
 25 to deep structure, and the way we do that is

1 competitive advantage over NXIVM?  
 2 A. As I -- well, maybe I wasn't clear.  
 3 If the statement is true, it gives them a  
 4 competitive advantage by the theory of it starts  
 5 to give or it may give all of the trade secret,  
 6 depending on the statement or part of the trade  
 7 secret away, especially if it's with a group of  
 8 people who have taken the trade secrets and are  
 9 bringing them out to the public.  
 10 If the statement is false, it has the same  
 11 effect in a different way. Assuming that the  
 12 statement is either true or false, both bringing the  
 13 trade secrets either out to the public or hurt us  
 14 with the very trade secrets.  
 15 Q. Okay. Looking at the idea of a competitor,  
 16 is it your understanding that a competitor would  
 17 read this and say, boy, if I could spew nonsense, I  
 18 could be as successful as NXIVM?  
 19 A. Can -- would you mind defining what you mean  
 20 by a competitor?  
 21 Q. Somebody who wanted to -- well, how do you  
 22 define competitor?  
 23 A. I didn't use it in the question.  
 24 Q. Okay. Would somebody who was looking to do  
 25 human potential training -- what would you say is

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1 the business of NXIVM?  
 2 A. I would say the business of NXIVM is  
 3 increasing joy.  
 4 Q. Okay. Would somebody else who's looking to  
 5 increase joy say to themselves after reading this  
 6 article -- strike that.  
 7 So is any compe -- is a competitor of NXIVM  
 8 any other group that looks to increase joy?  
 9 A. I'm not a -- a lawyer. I would think that in  
 10 a broad sense, that could be, because the reason why  
 11 people come to NXIVM it is my belief is to increase  
 12 joy either very directly or ultimately. So that's a  
 13 quick definition.  
 14 Q. Okay. Would somebody -- another group that's  
 15 looking to make money by increasing joy be able to  
 16 say to themselves after reading that sentence, if I  
 17 spout gibberish, I can take some of NXIVM's business  
 18 away?  
 19 A. I think they might say, if I spout gibberish,  
 20 utilizing the other things in these articles, I  
 21 might be able to or I might be able -- because NXIVM  
 22 is spouting gibberish and they're doing that, but  
 23 second of all, if I have the trade secret -- and  
 24 maybe I am a competitor -- it is using the trade  
 25 secret against us to take business away.

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1 Q. Next paragraph, "Pre-emptive neutralization  
 2 of criticism of the group by participants and their  
 3 family/friends early on."  
 4 You -- about halfway through that you --  
 5 the sentence is, "Since it is likely that group  
 6 outsiders will perceive aspects of the group's  
 7 activities as 'manipulative' or as a 'cult,' these  
 8 two words are used as the sole examples of 'abstract  
 9 terms' that a Shifter will use."  
 10 How is that a trade secret under your  
 11 definition?  
 12 A. Well, things relating to what we term as  
 13 shifter strategies or a person who uses them may be  
 14 called a shifter; and things like manipulative and  
 15 cult, amongst other things, are discussed. This is  
 16 beginning to say what is discussed, beginning to say  
 17 how it is discussed. I suspect that with a few  
 18 other sentences, there could be more trade secrets  
 19 revealed or more of the trade secrets revealed.  
 20 Q. Mr. Raniere, can someone make an informed  
 21 criticism of NXIVM without revealing its trade  
 22 secrets?  
 23 A. Absolutely.  
 24 Q. How could that be done? Somebody who is  
 25 taking the course, can they make a criticism without

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1 revealing the trade secrets?  
 2 A. Yes. Otherwise, I would have not only  
 3 underlined every paragraph here, but you have to  
 4 assume that the people that take NXIVM for the most  
 5 part are not competitors and they are -- they won't  
 6 compete with NXIVM. There is a noncompete, and  
 7 given that they're noncompetitors and given that  
 8 they don't have all of the trade secrets or even if  
 9 they did have all of the trade secrets, if they  
 10 wrote certain criticisms, it would be fine.  
 11 Q. Let's say I took a 16-day Intensive, didn't  
 12 like it, wrote an article or posted a blog entry  
 13 that said, you know, "I took this class called NXIVM  
 14 and I read the materials that they gave me; and it  
 15 was just gibberish. They redefine words in their  
 16 own idiosyncratic ways."  
 17 A. Uh-huh.  
 18 Q. Does that reveal a trade secret?  
 19 A. Are you a competitor, first of all?  
 20 Q. I'm writing an arti -- I'm putting an article  
 21 on the Internet or in a newspaper where anyone can  
 22 see it.  
 23 A. Well, it may or may not start to reveal the  
 24 trade secrets.  
 25 Q. And if I write in the article, "Go look for

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1 joy somewhere else 'cause this program really  
 2 stinks. The words are gibberish," is that -- that  
 3 might start to reveal a trade secret?  
 4 A. It may start to. The reason why I'm being  
 5 hesitant is I'm not -- as I said, I would have to  
 6 think about this even more. I know that through  
 7 these articles and many of these statements, there  
 8 is a constructive revealing of the trade secrets.  
 9 You asked me to take each statement and  
 10 assess it and what I would say assess it  
 11 superficially and underline it or not, and I assumed  
 12 you wanted me to underline generously as opposed to  
 13 leaving out. Part of what you asked is which way it  
 14 went, and I did so. But, you know, just like with  
 15 anything, it needs to be thought out.  
 16 Q. If I were to put in my blog entry, "You know,  
 17 I took this NXIVM class and you know what? I know a  
 18 way of increasing your joy. Save your \$7500 and  
 19 don't take this nonsense," does that make me a  
 20 competitor?  
 21 A. No, not necessarily. I'm not sure. It  
 22 depends. Are you selling that? Are you earning  
 23 money from that?  
 24 Q. I'm just warning people off.  
 25 A. Well, you're probably not a competitor, but

1 I'm not sure. I mean, competitors can warn other  
2 people off of other competitors and still earn  
3 position that way. I mean, I think a competitor  
4 can destroy another competitor before they even come  
5 into the market. You know, I suspect if you did  
6 something like that and maybe you did it so  
7 effectively that you stopped all people from coming  
8 to NXIVM; and NXIVM, you know, was moribund, had no  
9 business, and then you hung a shingle and opened up  
10 a business just like NXIVM, I would suspect I would  
11 think you were a competitor even though at the time  
12 you were doing it you weren't earning from it.

13 Q. Could I disclose a trade secret if I'm not a  
14 competitor?

15 A. Yes, I think so.

16 Q. So if I were to write, "Don't take NXIVM's  
17 classes. They make you bow down to this guy named  
18 Vanguard," is that disclosing a trade secret?

19 A. Repeat the sentence. You're asking me to  
20 evaluate on a sentence-by-sentence basis and,  
21 honestly, I don't feel capable of giving you a  
22 complete evaluation. You know, our competitors who  
23 look to take our trade secrets just don't take a  
24 single sentence and sit and say, oh, yeah; oh, no.  
25 They'll think about it, maybe think about it for

1 they were given to him, and he may use them.

2 Q. Do you know one way or the other whether he  
3 knows you exist?

4 A. I think he does know we exist, but I'm not  
5 sure. Yeah.

6 Q. Did you ever take any classes with Tony  
7 Robbins?

8 A. No.

9 Q. Okay. Next to the last page, carrying over  
10 to the last page of this article --

11 A. Yeah.

12 Q. -- says -- you underlined the sentence, "All  
13 of this is soft peddled to participants as analogous  
14 to calling your dentist (who finished a universally  
15 recognized course of study) by the title 'doctor.'"

16 A. Uh-huh.

17 Q. What makes that -- what trade secret is being  
18 disclosed by that sentence?

19 A. That's relating to certain things I think  
20 within Rules and Rituals. Again, it is a fragment.  
21 I need to clarify that. You know, I think it's a  
22 highly effective strategy. If someone is  
23 malintended, if I'm a competitor of you and I have  
24 your trade secrets, instead of using the trade  
25 secrets myself I just release them to another one of

1 years. I believe our noncompete clause is three or  
2 five years or something like that.

3 Q. Do you know of any competitors who are  
4 looking to take your trade secrets?

5 A. I believe so.

6 Q. Who?

7 A. It depends how you define competitor.

8 Q. Well, how do you define competitors who are  
9 looking to take your trade secrets?

10 A. Well, I believe Rick Ross is a competitor.  
11 I believe John Hochman is a competitor. I believe  
12 Paul Martin is a competitor. I believe that Tony  
13 Robbins is a competitor. As a matter of fact, if  
14 someone is, for example, a therapist or a  
15 psychiatrist, they go through a different entrance;  
16 and we do treat them as a competitor.

17 John Hochman is a psychiatrist.

18 Q. Is Tony Robbins trying to take your trade  
19 secrets?

20 A. I don't know if he's trying to take our trade  
21 secrets. I suspect if he thought they were valuable  
22 he would -- you know, I don't want to make an  
23 evaluation on Tony Robbins' honesty or dishonesty.  
24 I don't think he is out to steal trade secrets, but  
25 he may not even realize they're trade secrets if

1 your competitors and let them destroy you, and I  
2 never use them. So when you release things or  
3 parts of things, it can be very damaging.

4 Q. Okay. Let's put Raniere-5 aside for now and  
5 go on to Raniere-6, which is Robert Jay Lifton's  
6 eight criteria of thought reform as applied to  
7 Executive Success Programs.

8 You highlighted the next to last paragraph  
9 concerning phone tree.

10 MR. McGUIRE: Page 1.

11 A. Page 1.

12 Q. Page 1. I'm sorry.

13 A. Yes.

14 Q. Is the idea of having a phone tree unique to  
15 NXIVM?

16 A. I'm not sure. This is a quote right out of  
17 one of the manuals it appears.

18 Q. Uh-huh, but is the concept of a phone tree  
19 unique to NXIVM?

20 A. I think potentially the way NXIVM does it  
21 maybe. If --

22 Q. Just the fact that there's a phone tree that  
23 NXIVM uses, you're not claiming that that's unique,  
24 since, after all, my son has a phone tree when his  
25 school is cancelled.

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1 A. Uh-huh, that's true. I am in part, and the  
 2 reason why I put this, this is a quote out of the  
 3 manual. This particular author, Paul Martin, took  
 4 the only thing that I wrote which was the Mission  
 5 Statement and copied 55 percent of it in parts.  
 6 I think I could copy a whole confidential  
 7 manual if you just give me enough article space and  
 8 I keep on releasing quote after quote. I think if I  
 9 released the whole manual, I could give away the  
 10 trade secrets. So every quote in here out of our  
 11 manual released from someone who has our trade  
 12 secret manual, and when that information is not  
 13 supposed to be released potentially leads to the  
 14 release of a trade secret. There are a lot of  
 15 quotes in here.  
 16 Q. If I read this paragraph, would I be able to  
 17 say -- and I'm a competitor, Tony Robbins, let's  
 18 say -- I say, oh, they've got a phone tree and each  
 19 -- whatever the paragraph says, would I be able to  
 20 say, Aha, I've got it? I can replicate NXIVM?  
 21 A. You start to have an understanding, and  
 22 depending on what other information you have, this  
 23 paragraph might be the final piece, certainly.  
 24 Q. Okay. The paragraph after that the only word  
 25 you underlined is "leased."

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1 Does that paragraph contain a trade secret?  
 2 A. It probably does. It is in quotes, and I  
 3 wasn't sure if that was a quote. I think it was a  
 4 quote off the application; and in that case it's not  
 5 a problem because it's not from the trade secret  
 6 secretive material, but I was unsure, so I lightly  
 7 did that.  
 8 Q. By the way, just going quickly back to  
 9 Ranieri-5, is there anything from there -- any of  
 10 the trade secrets that are -- you claim are  
 11 disclosed in that article that are from the  
 12 Facilitator materials that were given to Stephanie  
 13 Franco?  
 14 A. Hard to tell.  
 15 Q. And that's because he doesn't cite where  
 16 different things came from?  
 17 A. Well, it's also hard to tell how these pieces  
 18 will add together as someone is unraveling what the  
 19 trade secrets are.  
 20 Q. Okay. Looking back at Ranieri-6, sir, you  
 21 have the statement about halfway down -- the quote  
 22 is from the section Money.  
 23 A. The direct -- well, halfway down which -- I'm  
 24 sorry, which page?  
 25 Q. Page 2?

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1 A. Page 2.  
 2 Q. Yeah.  
 3 A. And this is Ranieri-6?  
 4 Q. Yes.  
 5 A. Okay. Money, yes.  
 6 Q. And it's your understanding that those  
 7 concepts there are unique to NXIVM?  
 8 A. There's more than the concepts here. First  
 9 of all, this is a quote. Second of all, this is not  
 10 only each of the concepts but their specific order  
 11 and as that order integrates together, and these are  
 12 some of the things that are -- this may be even all  
 13 of the things in that portion of the module.  
 14 Q. Then looking at Number 8 under or in the  
 15 quote from Money, it says, "Having money brings out  
 16 the true nature of people."  
 17 A. Uh-huh.  
 18 Q. Is that an idea that's unique to NXIVM?  
 19 A. Do you believe that that idea has to be  
 20 unique to NXIVM to be a trade secret?  
 21 Q. I'm -- your definition of trade secret used  
 22 the word unique.  
 23 A. Uh-huh. I believe that's part of a unique  
 24 idea. I believe the order of these concepts is  
 25 unique, and I believe just like any message -- you

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1 know, I can give you a trade secret and suppose I  
 2 have a formula in organic chemistry, I can of course  
 3 look at the formula and say is the letter C unique,  
 4 and you would have to say no; say is carbon unique,  
 5 and you'd have to say no. But this gives not only  
 6 carbon and it does say that carbon is in the formula  
 7 which is starting to give away the trade secret that  
 8 starts to give the order and the nature, and part of  
 9 the trade secrets are not just the information  
 10 presented. It's the order. It's sometimes the  
 11 order of the words within a question specifically.  
 12 Sometimes it's the orders of the questions within a  
 13 module. It is definitely those things and the order  
 14 of module within a curriculum and the order of  
 15 curriculum within a whole. This comes down to how  
 16 surface structure and deep structure are understood  
 17 in the human mind.  
 18 Q. Let's say the only thing quoted there was the  
 19 last -- was Number 8, "Having money brings out the  
 20 true nature of people."  
 21 A. Uh-huh.  
 22 Q. Would that be disclosure of a trade secret?  
 23 A. In itself, no.  
 24 Q. Okay, since you'd agree that's a fairly banal  
 25 idea?

1 A. Well, I would -- just like every trade secret  
2 is made of common letters, I would say most trade  
3 secrets are made of banal ideas.

4 Q. Next paragraph under "Mystical Manipulation,"  
5 you drew on the side lines, "The claim of divine  
6 authority or spiritual advancement that allows the  
7 leader to reinterpret events as he or she wishes, or  
8 make prophecies or pronouncements at will, all for  
9 the purpose of control" -- "at will, all for the  
10 purpose of controlling group members."

11 A. Uh-huh.

12 Q. Were you indicating that that's a trade  
13 secret of NXIVM's?

14 A. One of the important things of NXIVM is that  
15 we are what you might call anti-mysticism. We are  
16 critical thinkers. We use scientific model. We  
17 take things down to assumptions. We go beyond  
18 assumptions, breaking those down further.

19 To speak of these sort of things starts to go  
20 towards those trade secrets. Again, in itself, no;  
21 and that's why I asked you. Here is a -- a  
22 situation where in the middle of this paragraph you  
23 have Lifton being quoted.

24 Q. Uh-huh.

25 A. Now, the question is can I use quotes from

1 that wrote the articles may well have acted together  
2 as competitors. It's -- there are a lot of issues  
3 here.

4 Q. You're saying -- and who are the people who  
5 you understand wrote the articles?

6 A. I think Paul Martin wrote this article. Is  
7 that correct?

8 Q. Right.

9 A. John Hochman wrote the other article, and  
10 Paul Martin wrote two articles so two by Paul Martin  
11 and one by John Hochman.

12 Q. What evidence do you have that they acted  
13 together in writing the articles?

14 A. There's fingerprints.

15 Q. I'm not asking for detective work. What  
16 evidence do you have?

17 A. Okay. We've had about 8,000 students come  
18 through our course, and we've had many people from  
19 the outside world look at it or whatever. There are  
20 some mistakes that people can make looking at our  
21 information, but then there are some errors that are  
22 not just random. They're -- they're very  
23 unprobablistic oversights.

24 In the John Hochman article he mentions  
25 that we've had over 400,000 people through the

1 other authors to reveal a trade secret? Well,  
2 certainly I could quote sentences from many, many  
3 authors, put those sentences together and tell you  
4 anything about any trade secret. So that's why I  
5 put a little sort of arrow. I didn't underline it  
6 specifically, but this -- this starts to beg the  
7 question, not only talking about certain subject  
8 matters but utilizing other authors and quoting them  
9 to bring concepts across. When you have improperly  
10 -- when you improperly have trade secrets, that can  
11 be used to not only reveal them but utilize them to  
12 your own benefit, especially if you're a competitor.

13 Q. But standing alone, that sentence would not  
14 reveal a trade secret of NXIVM's?

15 A. It may if it were the final piece in a  
16 puzzle.

17 Q. Do these three articles taken together  
18 provide the whole puzzle?

19 A. Hard to tell.

20 Q. Are you saying that 30 years of your life's  
21 work might be captured by three articles?

22 A. Well, I have more than one trade secret. I  
23 think we probably have hundreds of them. I think  
24 that in -- it's hard to say how astute someone is in  
25 reading the articles. I also think that the people

1 organization. That is, especially for someone who  
2 is studying the material, probably derived from the  
3 website where it mentions in my past company there  
4 were over 400,000 people. John Hochman made a  
5 pretty strange error -- no one's made this error  
6 before that we know of -- that somehow ESP has had  
7 400,000 people through it. It struck me when I read  
8 this article last night that Paul Martin also  
9 mentions that we've had 400,000 people through ESP,  
10 which means to me that there's a likelihood that  
11 either John Hochman got this from Paul Martin, Paul  
12 Martin got this from John Hochman or they both got  
13 it from Rick Ross, but there is a -- if you give me  
14 a few seconds, I can find where he mentions it. It  
15 may not be in this article. It may be -- which is  
16 the one I read last night?

17 Do you have the Exhibit Number of what I read  
18 last night?

19 MR. CAMPION: 8.

20 A. 8.

21 Q. It should be up --

22 A. I'm in 6. Wait a few seconds. 8.

23 On Page 5 he starts to talk, "Keith Raniere  
24 who has trained" -- or about halfway down, I put a  
25 little dot for you, actually. "Keith Raniere who

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1 has trained over 400,000 followers who are now  
 2 rapidly accumulating most of the world's wealth."  
 3 We've had a number of people on blogs and  
 4 things like that, you know, say all sorts of things.  
 5 People don't make that error. That's a pretty what  
 6 you might call careless, improbable error. Both  
 7 Hochman and Martin make the same error.  
 8 Q. So you find it improbable that it's a  
 9 coincidence?  
 10 A. I find that there is a likelihood it's not a  
 11 coincidence.  
 12 I think that with -- if you read, for  
 13 example, the Hochman settlement and some of the  
 14 other issues involved, make it a very reasonable  
 15 hypothesis, also, that it's not just a coincidence.  
 16 Q. When you say "the Hochman settlement," what  
 17 are you referring to?  
 18 A. There is a settlement that John Hochman has  
 19 with NXIVM.  
 20 Q. And what does he say in that settlement  
 21 document that leads you to believe --  
 22 A. Well, there is --  
 23 Q. -- that his errors were not honest?  
 24 A. It's not that his errors were not honest.  
 25 It's that it appears that he does not view his

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1 article as a scientific study. It appears that he  
 2 incorporated what he saw as Rick Ross' negative view  
 3 into his study. If that be the case, he has some  
 4 reason for believing Rick Ross has a negative view  
 5 through some sort of a communication. It's also  
 6 possible to assume that such a communication  
 7 occurred with Paul Martin.  
 8 Q. What is the Rick Ross --  
 9 MR. SKOLNIK: Harold, one moment.  
 10 Mr. Raniere has just testified about a  
 11 settlement agreement that has not be produced in  
 12 this case; and I call for its production, please.  
 13 MR. McGUIRE: It's confidential.  
 14 MR. SKOLNIK: We'll take it under our  
 15 confidentiality order.  
 16 MR. McGUIRE: We'll see.  
 17 BY MR. KOFMAN:  
 18 Q. What in the Hochman settlement documents  
 19 indicates that he did not view his article as a  
 20 scientific method?  
 21 A. I -- I only -- I did not see the full thing.  
 22 There is an affidavit of sorts, testimony. I  
 23 believe he said that it was not meant as a  
 24 scientific study. Had he done the normal process  
 25 of a peer-reviewed scientific report that the

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1 results may well have been different. I -- I don't  
 2 have the settlement in front of me to quote, and I  
 3 only saw it briefly.  
 4 Q. Is it your understanding that the District  
 5 Court in that case dismissed NXIVM's claims against  
 6 Mr. Hochman?  
 7 A. It is my understanding that NXIVM had a  
 8 court case against Hochman. They were dismissed, so  
 9 Hochman had won that; and although it was dismissed  
 10 and Hochman had won, he still settled instead of  
 11 going to the Court of Appeals, and it seemed like he  
 12 made some -- for someone who has won a court case  
 13 made some pretty strong statements.  
 14 Q. Are you aware of any favorable articles that  
 15 have been published concerning NXIVM?  
 16 A. I don't -- I don't think so. I'm trying to  
 17 think. I don't think so.  
 18 Q. Getting back to Raniere-6, I'd like you to  
 19 take a look at the third from last page.  
 20 A. Raniere-6, third from last. Can you give me  
 21 a --  
 22 Q. The Bates stamp number is P3658.  
 23 A. Oh, thank you.  
 24 THE WITNESS: I'm sorry. I said thank  
 25 you.

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1 MR. SKOLNIK: Harold, where are you?  
 2 MR. KOFMAN: P3658 on Raniere-6.  
 3 A. Uh-huh.  
 4 Q. Do you see that the third from the bottom is  
 5 the -- is a quote from Work and Value.  
 6 A. Uh-huh.  
 7 Q. And the quote is, "This practice session will  
 8 give you a clear definition of work, an appreciation  
 9 of civilization and what it has given us,  
 10 humankind's purpose, and our own value in the  
 11 world."  
 12 Does that statement standing alone constitute  
 13 a trade secret of NXIVM?  
 14 A. Again, what I see on this page are a series  
 15 -- the whole page is quotes. As a matter of fact,  
 16 on the bottom, I probably forgot to mark one because  
 17 there is a quote here out of Tribute - 5th  
 18 Integration which not only gives the quote of the  
 19 module but the place in the curriculum.  
 20 Could you mark that, that that also --  
 21 Q. If you'd mark it on that --  
 22 A. Okay.  
 23 Q. -- the Exhibit copy.  
 24 THE WITNESS: And anyone else who has  
 25 copies.

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1 Continuing...

2 A. So each of these are quotes directly out of

3 the trade secret protected module -- the manual. I

4 do believe that the concepts behind this and the

5 order of the concepts behind this certainly are

6 trade secrets. I think that this potentially

7 provides a window, certainly provides a small window

8 into the manual. This page is all quotes from the

9 manual. It may as well just have quoted the manual

10 and asked me if each quote out of the manual reveals

11 a trade secret.

12 Q. Is there any trade -- do any of these quotes

13 standing alone reveal a trade secret of NXIVM in it

14 -- in its entirety?

15 A. I don't know.

16 Q. Are any trade secrets in their entirety

17 revealed anywhere in this article?

18 A. I don't know.

19 Q. How about in the previous article, A Forensic

20 Psych -- Ranieri-5?

21 A. I don't know.

22 Q. Okay. Let's turn to Ranieri Number 8, which

23 is the document that you looked at last night.

24 Are any trade secrets in their entirety

25 revealed in this article?

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1 A. You're -- you know, I'd like to answer your

2 question other than "I don't know," but just like if

3 you've ever seen a mystery movie or whatever, it is

4 quite possible for people to deduce absolutely

5 solutions and possibly trade secrets that I haven't

6 deduced.

7 Q. Are you aware of any trade secrets that are

8 revealed -- strike that -- that are disclosed in

9 their entirety in this article?

10 MR. McGUIRE: Object to the form of the

11 question.

12 Q. Are you aware of any trade secrets that are

13 disclosed in their entirety in this article?

14 MR. McGUIRE: Same objection.

15 A. Is that the same question? I'm not

16 understanding the difference.

17 Q. You can answer. He's just preserving an

18 objection.

19 A. Oh, I'm not sure.

20 Q. Okay. Paragraph -- on this document, looking

21 at P3677. It's about -- I think it's the fourth

22 page.

23 A. Yes.

24 Q. It says there, "Number five, maintains that

25 "There are no ultimate victims."

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1 A. Uh-huh.

2 Q. What does that phrase mean?

3 A. Well, I think that's something that is

4 answered with more examination. You have to

5 understand what a victim is and then what you mean

6 in the ultimate sense, what is a victim.

7 I mean, do you want a brief explanation?

8 Q. Yes.

9 A. I mean, I hate to go to extremes; but if you

10 have two people being tortured, one person can have

11 tremendous suffering and the other not. What the

12 person ultimately has as their emotional state is

13 personal and private to them and is independent of

14 -- it is not, if you will, an objective state, as in

15 humankind right now, we don't know of any objective

16 external circumstances that can inspire a specific

17 objective experience of emotion within you which

18 means there is a certain voluntary capacity that you

19 have for joy. So by saying there are no ultimate

20 victims it says that ultimately, no matter how bad

21 the circumstances are, you can have different

22 amounts of joy that are independent to some degree

23 of those circumstances and it holds a promise if --

24 if you believe there are no ultimate victims, then

25 you believe, I believe that humans can increase

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1 their capacity to have joy even in adverse

2 situations.

3 Q. Have you ever read an article that Stephanie

4 Franco wrote -- strike that.

5 Have you ever read anything that Stephanie

6 Franco has written?

7 A. Not in the entirety.

8 Q. What have you read from Stephanie Franco?

9 A. I saw an ad of hers for -- I think it was for

10 her therapy services or her website. I saw her

11 business card and I think -- I don't know if she --

12 I'm not sure if I saw her business card. I -- I

13 have a memory of that.

14 MR. KOFMAN: Okay. Let's take a

15 two-minute break, and then I'm going to go into

16 another area.

17 MR. CAMPION: Sure.

18 THE VIDEOGRAPHER: We're going off the

19 record at 10:40.

20 (At this point, there was a short

21 recess.)

22 (Affidavit of Keith Ranieri signed

23 August 22, 2003, with attached Exhibits was received

24 and marked Defendant's Exhibit Ranieri-11 for

25 Identification.)

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1 THE VIDEOGRAPHER: This is the beginning  
 2 of Tape Number 2. The time is 10:56. We're on.  
 3 BY MR. KOFMAN:  
 4 Q. Okay. Mr. Raniere, I'm going to show you a  
 5 document that's been marked as Raniere-11 and ask if  
 6 you can take a look at that, please.  
 7 A. (Witness complies.)  
 8 Q. Do you recognize that document?  
 9 A. Yes.  
 10 Q. What is the document?  
 11 A. It appears to be my Affidavit, and I checked  
 12 and it has my signature on the back, so I assume it  
 13 is so.  
 14 Q. Okay. That was going to be my next question.  
 15 Did you draft the Affidavit?  
 16 A. I was certainly involved in the drafting.  
 17 Q. Did you review the Affidavit before you  
 18 signed it?  
 19 A. Yes.  
 20 Q. And did you determine that the statements  
 21 there were accurate?  
 22 A. Yes.  
 23 Q. Okay. Do you recall if you made any changes  
 24 to the Affidavit before signing it?  
 25 A. No. This was very -- this was quite long

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1 ago.  
 2 Q. You don't recall?  
 3 A. I don't recall.  
 4 Q. I'd like you to turn your attention to  
 5 Paragraph 4.  
 6 A. Uh-huh.  
 7 Q. The first sentence says, "Three of the  
 8 copyrighted materials currently posted on the  
 9 internet, 12-Point Mission Statement, Work and Value  
 10 and Face of the Universe, reveal the content and  
 11 methodologies that are critical to the heart of the  
 12 entire coursework."  
 13 Is it your contention that 12 point Mission  
 14 Statement, Work and Value and Face of the Universe  
 15 were ever posted on the internet in their entirety?  
 16 A. I don't -- I don't know if they were posted  
 17 in their entirety. Certainly key important  
 18 elements, and I don't think any portion of them was  
 19 supposed to be posted.  
 20 Q. Okay. Did it ever come to your attention  
 21 that the entire documents were posted on the  
 22 internet?  
 23 A. No, it has not.  
 24 Q. Okay. Getting down a little further in that  
 25 same paragraph, it says "Consumers that read the

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1 passages may no longer desire to attend a course  
 2 wherein the material has been freely given to them."  
 3 Has any consumer ever told you that they  
 4 didn't take a NXIVM course because the information  
 5 was available for free on the internet?  
 6 A. That may have been so. I believe people in  
 7 the least have said, "I have read these articles. I  
 8 have no need to take your course."  
 9 But, you know, there have been so many  
 10 instances, thousands, I believe, of incident --  
 11 instances like that, I don't know specifically.  
 12 Q. Well, let's talk about conversations that  
 13 you've had.  
 14 Has anyone said to you, I don't have any need  
 15 to take this course because of these articles?  
 16 A. No, not that I recall.  
 17 Q. Okay, and has anyone said to you -- strike  
 18 that.  
 19 Paragraph 5 of your Affidavit under the  
 20 heading "Mail and email."  
 21 A. Uh-huh.  
 22 Q. The first sentence, it says, "An information  
 23 pack has been sent to key people interfacing with  
 24 our organization containing these false facts and  
 25 our copyrighted material."

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1 Did you ever see a copy of the information  
 2 pack that you refer to in that paragraph?  
 3 A. I'm not sure. I have seen several  
 4 "information packs."  
 5 I do remember seeing a pack that was sent to  
 6 a person. I'm trying to think of when it was 'cause  
 7 when I wrote this statement I had -- I believe I had  
 8 a specific pack in mind, but I can't recall what it  
 9 is.  
 10 Q. Did you -- did you ever see that pack?  
 11 A. From reading this, I may -- well may have.  
 12 I've seen a number of information packs sent around,  
 13 so to speak, even recently at universities and  
 14 things like that.  
 15 Q. Do you know who sent the information pack  
 16 that you're referring to in Paragraph 5?  
 17 A. No, not off the top of my head. No, I don't.  
 18 Q. Do you know what it contained?  
 19 A. Probably copies of the articles; the Hochman  
 20 report, the Martin articles. That's my guess.  
 21 Q. Is that -- well, I'd ask you not to guess.  
 22 Did you ever -- do you know one way or the other  
 23 what was in that information pack?  
 24 A. No.  
 25 Q. Do you know who received it?

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1 A. No, I don't remember at the time -- right  
 2 now.  
 3 Q. So it's the case that you don't remember much  
 4 -- recall much about that information pack?  
 5 A. Correct.  
 6 Q. At least as to that subject, I guess your  
 7 recall isn't total or even partial?  
 8 A. Well, there have been many information packs.  
 9 Q. Okay. Going a little further in that  
 10 sentence, "I have received messages and a  
 11 threatening e-mail addressed from a neighbor."  
 12 A. Uh-huh.  
 13 Q. When you say you've received messages, what  
 14 are you referring to?  
 15 A. Phone messages, written messages put on the  
 16 car, people driving up and threatening verbally;  
 17 things like that.  
 18 Q. Did you save any of the written messages?  
 19 A. I may -- there may be, but I'm not sure.  
 20 It's an ongoing thing.  
 21 Q. Did you turn any of those over to a lawyer?  
 22 A. I'm not sure. I don't know what went through  
 23 discovery. I tend not to keep -- if there are like  
 24 tapes or whatever, I tend not to keep them. Papers  
 25 that I have are either filed or if I write something

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1 or I'm involved with something else, often I don't  
 2 have the paper.  
 3 Q. Let's go back. When you say "tapes," what do  
 4 you mean, tapes that you don't keep?  
 5 A. In other words, if I go and I'm, for example,  
 6 giving a forum, I will go and give a forum. They  
 7 will tape what I say in the forum, what goes on in  
 8 the forum; but I don't have those tapes.  
 9 Q. How about tapes of any threatening messages  
 10 that you got?  
 11 A. I am not sure if such a tape exists. There  
 12 is a possibility that there is one.  
 13 Q. Did it ever exist -- okay. What makes you  
 14 believe that there may be a tape?  
 15 A. Because once when I was on a walk -- and I  
 16 walk -- I used to walk daily 8 to 12 miles, and what  
 17 I would do in the walks at times were have meetings  
 18 with people. People would tape those meetings.  
 19 There were a number of occasions where people drove  
 20 up in cars, threw things, screamed, cursed. Several  
 21 neighbors came down and said very hostile things. I  
 22 think there were -- there might have been at least  
 23 one occasion where such an interaction was taped;  
 24 but, as I said, it happens frequently; and I've  
 25 walked quite a bit, but I think there might be a

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1 tape.  
 2 Q. Did your lawyers ever -- after you put this  
 3 in the Affidavit, did your lawyers ever ask to hear  
 4 the tape?  
 5 A. I don't know. I don't keep track -- I don't  
 6 keep possession of the tapes.  
 7 Q. Did your lawyers ever ask you to hear the  
 8 tape?  
 9 THE VIDEOGRAPHER: BlackBerries, turn  
 10 them off.  
 11 MR. KOFMAN: Are we off the record?  
 12 THE VIDEOGRAPHER: No, we're still on.  
 13 Continuing...  
 14 A. No.  
 15 Q. Okay.  
 16 A. I never mentioned it to them.  
 17 MR. KOFMAN: I'd like to make a request  
 18 for copies of any tapes, conversations.  
 19 Mark the record.  
 20 MR. CAMPION: You'll include that  
 21 in the letter you described yesterday?  
 22 MR. KOFMAN: Absolutely.  
 23 MR. CAMPION: Thank you.  
 24 (Request.)  
 25

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1 BY MR. KOFMAN:  
 2 Q. What were some of the things -- who were the  
 3 neighbors who yelled things at you?  
 4 A. I don't know their names and some of them  
 5 might -- people who appear not to live necessarily  
 6 where I walk waiting to run into me or whatever  
 7 so --  
 8 Q. So there were people who were waiting for you  
 9 on your walk?  
 10 A. Uh-huh.  
 11 Q. Do you walk the same time every day?  
 12 A. Sometimes. I walk quite a bit, 8 to 12 -- I  
 13 don't now. In the past year, I have not walked that  
 14 much -- two years even -- but certainly before a  
 15 year or before two years I was walking 8 to 12 miles  
 16 a day.  
 17 Q. Anybody yell anything at you before August  
 18 2003?  
 19 A. No.  
 20 Q. What did they yell at you that -- that's  
 21 referenced in this paragraph?  
 22 A. Well, "You're a cult. You're killing people.  
 23 You should be killed."  
 24 Nancy had her house being built. It was --  
 25 the picture of it was in the paper, and there was a

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1 security system being installed so one person came  
 2 up and said and also said to other people, "Oh, they  
 3 better have a security system in there. You guys  
 4 are going to need it. I hope you get killed."  
 5 Q. Did they say that to you, or was that to  
 6 Nancy?  
 7 A. To me.  
 8 Q. Okay.  
 9 A. And I believe they might have said that to  
 10 Nancy. Although Nancy's not under deposition right  
 11 now, you may want to ask her.  
 12 Q. Did you report anything to the police?  
 13 A. We have tried at times to report things to  
 14 police or have actions done like the indictment of  
 15 Joe O'Hara. Most of the time we are ignored.  
 16 Q. Did you report any of these instances where  
 17 people have yelled threatening things to you to the  
 18 police?  
 19 A. No. It's -- I haven't had too many occasions  
 20 where there's a threat from a person -- a given  
 21 individual more than once or it's a chronic thing.  
 22 Q. And you didn't feel any of these threats were  
 23 credible?  
 24 A. I feel they're credible. I feel there's  
 25 nothing I can do about them.

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1 Q. So you didn't report any of those threats to  
 2 the police?  
 3 A. Correct.  
 4 Q. Okay. It says here that you received a  
 5 threatening e-mail addressed from a neighbor.  
 6 A. Yes.  
 7 Q. What did the e-mail say?  
 8 A. I don't remember offhand. There have  
 9 actually been a number of threatening e-mails from  
 10 neighbors. Normally they say things like, you know,  
 11 "You're a cult. You're evil. We know where you  
 12 live." They -- they make a lot of threats. "You  
 13 better watch where you go," things like that.  
 14 They're normally nothing direct like, "We're  
 15 going to kill you," although sometimes the verbal  
 16 threats are that way.  
 17 There was a church in our area that I had  
 18 also heard rumor made announcements to that effect.  
 19 Q. Made announcements to what effect?  
 20 A. That there was a cult in the area and that  
 21 all the parishioners should be careful and watch out  
 22 and -- a warning.  
 23 Q. What was the name of the church?  
 24 A. I don't remember. I know it was -- I could  
 25 probably find out if I questioned.

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1 Q. How did you hear about that?  
 2 A. There was a friend who had, I believe a  
 3 janitor that worked not only in the church but was  
 4 part of the parish.  
 5 And this is -- this is several levels of  
 6 information.  
 7 Q. The e-mails, how do you know they were from  
 8 neighbors? Did people give their names?  
 9 A. Sometimes.  
 10 Q. And the names you recognized as being  
 11 neighbors?  
 12 A. Sometimes.  
 13 Q. What did you do with the e-mails?  
 14 A. They're on some computer, some hard drive  
 15 that's probably long gone. When I did a search  
 16 through my e-mails, I think that would have been  
 17 something I would have turned over. I know that was  
 18 something that would have been relevant, and they're  
 19 not in my e-mails currently.  
 20 Q. Did you download any of these e-mails.  
 21 A. They automatically download if they're on the  
 22 Kunterre account. On the NXIVM account, they would  
 23 have been held on the server except we had a virus  
 24 attack the -- there was a time when a group was  
 25 attacking Scientology, and it was claimed because of

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1 Rick Ross' site -- but I don't know if this is  
 2 true -- that we were viewed as a Scientology front  
 3 so they attacked our server, and we had to change  
 4 all of our hard drives and so a lot was lost.  
 5 Q. When was that?  
 6 A. I don't know. When was the date that there  
 7 was -- it was -- it made major news, and it shut  
 8 down our server. It was probably like a  
 9 year-and-a-half ago.  
 10 Q. Did you print out any of the e-mails that  
 11 were sent to -- any of the threatening e-mails?  
 12 A. Not for myself, but I believe some of them  
 13 were printed out.  
 14 Q. By who?  
 15 A. Well, if they're sent on the NXIVM server,  
 16 they're probab -- they were printed out by NXIVM. I  
 17 didn't print out any of the e-mails that came to my  
 18 personal e-mail.  
 19 Q. Did you consider them evidence in connection  
 20 with this case?  
 21 A. No.  
 22 Q. You've been in litigation before, haven't  
 23 you?  
 24 A. Yeah.  
 25 Q. Have you ever been instructed to preserve

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1 documents?  
 2 A. I think relevant documents. Something where  
 3 someone says you better watch out or whatever, it  
 4 seems to me like a silly document especially if you  
 5 -- you present a hundred of those documents when you  
 6 have things that are far more egregious and far more  
 7 demonstrable.  
 8 Q. It was relevant enough for you to put in this  
 9 Affidavit, wasn't it?  
 10 A. Yes.  
 11 Q. But not relevant enough for you to save?  
 12 A. Because there are many of them.  
 13 Q. Did you save one of them?  
 14 A. There might be. I'm -- I'm not positive. I  
 15 know it is not on my computer. There may be a  
 16 printout.  
 17 MR. KOFMAN: I would make a request for  
 18 one of those documents.  
 19 (Request.)  
 20 Q. 'Cause you understand that without actually  
 21 seeing that document, it's just your word that you  
 22 received these?  
 23 A. Uh-huh.  
 24 Q. You have to respond verbally.  
 25 A. Oh, yes. I suspect because it is in this

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1 Affidavit there is probably a copy of it. I doubt I  
 2 would want it -- I would mention it if there wasn't  
 3 such a thing.  
 4 MR. KOFMAN: It's been -- I'll put on  
 5 the record that that's already -- that's been  
 6 requested previously in this litigation as has the  
 7 information pack and never been produced. I'll  
 8 repeat the request now and follow up with a letter.  
 9 (Request.)  
 10 BY MR. KOFMAN:  
 11 Q. You said at some point things have been  
 12 thrown at you?  
 13 A. Uh-huh.  
 14 Q. You report those instances --  
 15 You have to answer with a "yes" or a "no."  
 16 A. Oh, yes.  
 17 Q. You report those instances to the police?  
 18 A. No.  
 19 Q. Same paragraph, Paragraph 5, under "Loss of  
 20 key people."  
 21 A. Yes.  
 22 Q. It says, "We have even lost a 4 year veteran  
 23 Principal Coach."  
 24 A. Yeah.  
 25 Q. Who are you referring to?

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1 A. Peter Fallon.  
 2 Q. What was Mr. Fallon's rank in the group?  
 3 A. I believe he was a four-stripe coach.  
 4 Q. Okay. Is he a friend of yours?  
 5 A. Yes, he was.  
 6 Q. Did Mr. Fallon tell you why he was leaving?  
 7 A. Because I believe he said his wife had phone  
 8 conversations with Rick Ross. His wife became very  
 9 negative on the organization, and he did not want  
 10 that conflict in his life.  
 11 Q. Did he indicate anything about the trade  
 12 secrets being disclosed as a reason for him leaving?  
 13 Strike that.  
 14 Back up. Was that a conversation he had  
 15 with you or with someone else that was reported to  
 16 you?  
 17 A. He said some of that to me, I believe, and I  
 18 think he had numerous conversations with other  
 19 people. I used to play volleyball with him.  
 20 Q. Did he -- have you had any contact with him  
 21 since 2003?  
 22 A. Yes.  
 23 Q. Did NXIVM ever make an effort to have him  
 24 come back?  
 25 A. Could you please define what you mean by

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1 effort to come back?  
 2 Q. Did you ever ask him to come back to the  
 3 program?  
 4 A. You mean take other courses? Do you mean  
 5 come to a volleyball game? Do you mean --  
 6 Q. Come take courses.  
 7 A. I don't -- I don't think so. It may be  
 8 possible because at times he's wanted to be informed  
 9 of things and at times not.  
 10 Q. Okay. When he left, did he return any course  
 11 materials to NXIVM?  
 12 A. I think he did. I'm not sure.  
 13 Q. Do you know one way or the other?  
 14 A. I don't know one way or the other.  
 15 Q. Did you ask him to return any materials?  
 16 A. I don't know. I -- do you consider him --  
 17 you know, he is not an active coach; and we lost him  
 18 in that way in that function. He is someone who is  
 19 still friendly to us, and I'm not sure what his  
 20 level of involvement is with respect to interfacing  
 21 with the organization.  
 22 Q. Did Mr. Fallon indicate -- strike that.  
 23 So Mr. Fallon indicated the reason he was  
 24 leaving was because of his wife and negative things  
 25 she had heard about NXIVM?

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1 A. And the negative press, I believe.  
 2 Q. Okay. Next in this "Loss of key people" it  
 3 says, "Goldie Hawn cancelled her engagement with us  
 4 next week because of the false press."  
 5 A. Yes.  
 6 Q. Did you ever speak to Ms. Hawn?  
 7 A. No.  
 8 Q. Do you know who in the organization was  
 9 dealing with her?  
 10 A. I'm trying to think who was dealing with her  
 11 agent. I believe it was Barbara Bouchey.  
 12 Q. Did NXIVM suffer any monetary loss as a  
 13 result of Goldie Hawn not coming to Vanguard Week?  
 14 A. Yes.  
 15 Q. How so?  
 16 A. We had paid Goldie Hawn's agent \$50,000,  
 17 and Goldie Hawn's agent did not return the \$50,000  
 18 for something like two years. Goldie Hawn was very  
 19 upset by this, did not think it was appropriate. It  
 20 might have been an oversight.  
 21 If you call not having \$50,000 for two years  
 22 some sort of a damage, then yes. There's also the  
 23 damage of this being publicized because we keep most  
 24 of our people except people who give us permission  
 25 to say they're involved with the organization

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1 secret. So when it came out that Goldie Hawn was  
 2 coming, which we would never advertise, people  
 3 became fearful that they might be known or their  
 4 identities might be revealed 'cause we hold those  
 5 as secret, so we did have a good degree of damage  
 6 from that.  
 7 Q. Looking at Paragraph 5 where it says a  
 8 billionaire network founder left, is that referring  
 9 to Sheila Johnson?  
 10 A. Probably.  
 11 Q. Did you have a conversation with Ms. Johnson  
 12 about her leaving?  
 13 A. No.  
 14 Q. Did she ever return to take NXIVM classes  
 15 after this?  
 16 A. I'm not sure.  
 17 Q. Okay. Looking at Paragraph 8 of your  
 18 Affidavit, what year did you graduate from RPI?  
 19 A. I think officially it was '82.  
 20 Q. Why do you say "officially"?  
 21 A. Because I have three different degrees and  
 22 they -- I think they consider the first degree --  
 23 degree accruing in 1980. It's -- when I look and  
 24 they -- like on yearbooks or alumni sites, they say  
 25 that like I got a degree in '80, and then I think

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1 they might say one in '81 or '82.  
 2 Q. Okay. And those -- were those all Bachelor  
 3 of Science degrees?  
 4 A. Yes.  
 5 Q. Do you hold any advance -- any Master's  
 6 degrees?  
 7 A. No.  
 8 Q. Have you ever taken any classes for a  
 9 Master's degree?  
 10 A. Yes.  
 11 Q. When?  
 12 A. Starting when I first went to college when I  
 13 was 17.  
 14 Q. Did you decide not to pursue a Master's  
 15 degree?  
 16 A. No. I -- I haven't made a decision yet.  
 17 Q. So you may still go back and get your  
 18 Master's?  
 19 A. Sometime.  
 20 Q. Okay. And what were you taking class --  
 21 Master's classes in?  
 22 A. Well, they were actually -- they're Ph.D.  
 23 classes.  
 24 Q. Okay.  
 25 A. In mathematics and physics.

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1 Q. Okay. Paragraph 11 you have -- the second  
 2 sentence -- third sentence says, "To my knowledge I  
 3 was the first 17 year old to take advanced 600 level  
 4 mathematics courses in RPI's then 153 year history."  
 5 A. Yes.  
 6 Q. What's the basis for that knowledge?  
 7 A. Well, RPI has not only a registrar's office  
 8 but has -- at the time, they had an organization  
 9 called IPAC which was a student-run information  
 10 service that would do research on odd questions.  
 11 So when I was going through depositions with my  
 12 other company with the State Corporation Commission  
 13 and things like that, I needed to verify all of  
 14 these different things. I needed to verify that I  
 15 was in the Guinness Book of World Records. I needed  
 16 to verify that I had three degrees from RPI. I  
 17 needed to verify each of these claims. And we tried  
 18 with respect to the claim of were there any other  
 19 triple majors; and at that point, RPI had come back  
 20 with no, that I was the first and that this, in  
 21 fact, was true.  
 22 Q. Have you ever learned anything different?  
 23 A. No.  
 24 Q. Okay. How long did you work at MIT Bates  
 25 Laboratory?

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1 A. On and off for maybe a year.  
 2 Q. What was your title there?  
 3 A. I was a research -- I was a research  
 4 physicist and a systems programmer.  
 5 Q. Why did you leave MIT?  
 6 A. I never went to MIT.  
 7 Q. Why did you leave MIT Bates Laboratory?  
 8 A. Oh, because the physics group that I was  
 9 working with discontinued their project there. We  
 10 were renting time on the accelerator to measure  
 11 particle instances.  
 12 Q. Were you employed by MIT --  
 13 A. No.  
 14 Q. -- by the Bates Laboratory, or were you a  
 15 contractor?  
 16 A. I was through RPI, and I was on a work-study  
 17 program. I'm not sure how that was funded, although  
 18 I do know that it was a joint project between MIT  
 19 and RPI so the funding for my student item or  
 20 whatever it is may have come from there. I don't  
 21 know.  
 22 Q. In Paragraph 13 of your Affidavit you refer  
 23 to something called "The Life Learning Institute."  
 24 A. Yeah.  
 25 Q. Was that ever founded?

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1 A. How do you define "founded"?  
 2 Q. Did you ever -- did the Life ever -- Learning  
 3 Institute ever become operational?  
 4 A. No.  
 5 Q. Okay. What did you do for a living between  
 6 1984 and 1987?  
 7 A. I worked for the State of New York.  
 8 Q. In what capacity?  
 9 A. Well, I started out in the Department of  
 10 Labor as a computer programmer analyst; and then I  
 11 moved over to the Division of Parole as their head  
 12 of microcomputer services, which is the same item  
 13 level but different responsibilities.  
 14 Q. In Paragraph 18 of your Affidavit it says you  
 15 became an independent contractor for marketing and  
 16 sales organizations. What were the names of those  
 17 organizations?  
 18 A. Well, I think the one -- I mean, there were a  
 19 number of them.  
 20 Do you want me to go through the ones that I  
 21 remember?  
 22 Q. Why don't you? Yeah.  
 23 A. There was Prepaid Legal, there was TVC  
 24 Marketing. Let me see. Which thing was it saying  
 25 in here?

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1 There was Matol International. There was a  
 2 company called Nashika, I believe.  
 3 Q. Did you have a supervisor or someone you  
 4 reported to in that -- as a contractor?  
 5 A. No. Most of these things are very loose  
 6 structures.  
 7 Q. Looking at Paragraph 30 (sic), you refer to  
 8 the founding of Consumers' Buyline. Who were the  
 9 four friends with whom you started Consumers'  
 10 Buyline?  
 11 MR. McGUIRE: What Paragraph?  
 12 MR. KOFMAN: Paragraph 30.  
 13 MR. McGUIRE: Thank you.  
 14 Continuing...  
 15 A. Kristin Keeffe was one of them, a gentleman  
 16 named Dave Bush was another, a woman named Pam  
 17 Cafritz was another and a woman named Linda Smith.  
 18 Q. Okay. Are all of those individuals in --  
 19 were all of those individuals involved in the  
 20 founding of Executive Success Programs?  
 21 A. No.  
 22 Q. Who was not?  
 23 A. Dave Bush was not, Linda Smith was not --  
 24 when you say "involved in the founding" --  
 25 Q. Were all of those individuals -- did all of

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1 those individuals take classes with NXIVM?  
 2 A. No, only two of them.  
 3 Q. Kristin Keeffe and Ms. Cafritz?  
 4 A. Oh, I'm sorry. Linda Smith has also taken  
 5 classes, so that's three.  
 6 Q. Okay. Paragraph 28, I'm just going back a  
 7 little bit, you refer to a paper that you wrote that  
 8 "was circulated throughout my industry."  
 9 A. Uh-huh.  
 10 Q. What was the name of the paper?  
 11 A. It didn't have a name. People at times  
 12 referred to it as the White Paper.  
 13 Q. Was it published anywhere?  
 14 A. No.  
 15 Q. How was it circulated?  
 16 A. People photocopied it.  
 17 Q. Did you distribute it?  
 18 A. No.  
 19 Q. Did you write it? What did you write -- what  
 20 was the purpose of you writing the paper?  
 21 A. I wrote the paper as an essay to give to  
 22 certain reps so they would understand the way it  
 23 worked. And they, unfortunately, took the liberty  
 24 of copying it; and it was circulated, and it had an  
 25 impact.

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1 Q. Who were the people that you claim in  
 2 Paragraph 28 threatened you?  
 3 THE WITNESS: This is a person who --  
 4 MR. CAMPION: Answer the question.  
 5 A. He was the person at the time who was head of  
 6 Main Street Alliance. He was a major distributor  
 7 with a company called Fund America at one point.  
 8 Howard Ruff his name is.  
 9 Q. Okay. What did he say to you?  
 10 A. Well, he gave -- he actually gave me two  
 11 separate phone calls. The first phone call was sort  
 12 of nice before the paper and before our growth.  
 13 When he received the paper he said, "I don't know  
 14 who you think you are. This industry sticks  
 15 together. You need to watch your step. Your  
 16 company is growing now, but you'll be history."  
 17 He was right.  
 18 Q. Okay. I see you've attached to your or you  
 19 attach to your Affidavit various Exhibits, and I'm  
 20 going to look at those.  
 21 Actually, before we do that, let's get back  
 22 to Paragraph 43. How many months must one be  
 23 observed in order to be a facilitator?  
 24 A. I don't know.  
 25 Q. Is it more than two?

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1 A. It depends on the person. Normally, yes.  
 2 There are some people that show a special aptitude  
 3 or are motivated.  
 4 Q. Paragraph 44 on Page 14 you say that Mr. --  
 5 A. Paragraph 44 appears on Page 12 on my copy.  
 6 Q. And it continues through Page 14 --  
 7 A. Oh.  
 8 Q. -- so I'm looking at a portion that's on  
 9 Page 14.  
 10 A. Oh, okay.  
 11 Q. You say that Mr. Martin incorrectly states  
 12 that orange sash is the highest rank.  
 13 A. Correct.  
 14 Q. What ranks -- what sashes are higher in rank  
 15 than orange sash?  
 16 A. There is a green sash, there is a blue sash,  
 17 there is a purple sash, there is a brown plain sash,  
 18 then there's a brown sash that has a black trim.  
 19 Q. Uh-huh.  
 20 A. And then there is a brown sash that has like  
 21 a checkerboard, and then there is a brown sash that  
 22 has a brown top with black tails. Then there's a  
 23 black sash.  
 24 Do you want me to go -- there are probably --  
 25 there are more, a lot more.

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1 Q. Does NXIVM have documents that explain all of  
 2 these gradations?  
 3 A. I don't know if they have documents that  
 4 explain all of the gradations. Some of them we have  
 5 no one up at those ranks yet.  
 6 Q. And you said -- I think you said you had the  
 7 highest sash rank. It was double white, was that --  
 8 A. Right.  
 9 Q. What sash rank is Ms. Salzman?  
 10 A. She is what's called a prefect. All the  
 11 ranks, which the ranks I hadn't gotten to above what  
 12 are called the black sash or the mentor sash, are  
 13 more academic ranks. They are -- you go from mentor  
 14 to a senior mentor to a chancellor which oversees  
 15 schools to a -- what's called a prime and then  
 16 ultimately to a prefect, which oversees all of the  
 17 schools, and then you have senior prefects and  
 18 things like that which we don't have yet.  
 19 Q. So it's somewhat similar to the robes that ac  
 20 -- universities?  
 21 A. Academic.  
 22 Q. -- academic facilities would use?  
 23 A. The whole program was modeled after  
 24 academics.  
 25 Q. Looking at Appendix D or Exhibit D, what I

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1 want you to look at, the very last sentence on  
 2 Page 21.  
 3 A. Uh-huh.  
 4 Q. It says, "We have spent hundreds of thousands  
 5 of dollars to protect themselves and this very  
 6 valuable technology that is the culmination of  
 7 thirty years of my life."  
 8 How did you determine that you had spent  
 9 hundreds of thousands of dollars to protect trade --  
 10 trade secrets?  
 11 A. Well, I mean, at this point, we've spent tens  
 12 of millions.  
 13 Q. Would that include litigation costs?  
 14 A. I think, yeah, but I believe in this  
 15 particular case I had heard some things about the  
 16 losses. I certainly knew directly of some of the  
 17 losses. I know some of the things that had to be  
 18 done to try to prevent those losses. I suspect when  
 19 I said we spent hundreds of thousands, I would say  
 20 that if it were -- if I knew pretty certainly it was  
 21 between a million and 2 million, to underestimate  
 22 it. I don't remember the exact way I derived that  
 23 conclusion. I am sure at the date this Affidavit  
 24 was signed that it is pretty simple to show it's  
 25 hundreds of thousands or more.

1 Q. Did someone ever itemize for you what was  
 2 spent to protect the trade secrets?  
 3 A. No. I think I itemized it myself.  
 4 Q. Is there any documents that exist that  
 5 itemize what was done to protect the trade secrets?  
 6 A. I don't know.  
 7 Q. How was the hun -- how were the hundreds of  
 8 thousands of dollars spent, on what?  
 9 A. I'm not exactly sure. Let's see. I am  
 10 reading the paragraph for a second --  
 11 Q. Sure.  
 12 A. -- to see exactly what I'm referring to.  
 13 Okay. This talks about the trademarks and  
 14 the copyrights on our materials and to protect them.  
 15 I think I knew from Arlen, for example, that there  
 16 were costs even involved with his protecting,  
 17 trademarking the stuff, getting it registered or  
 18 whatever that process is, doing the litigation.  
 19 Q. What litigation?  
 20 A. Well, there's the -- way back when there  
 21 was a copyright action that was filed separately, I  
 22 believe, from the first action. I think it was a  
 23 second action.  
 24 Q. So some of that includes money that was spent  
 25 in this litigation?

1 posted on the internet and August 22, 2003? That's  
 2 what you were referring to?  
 3 A. Well, is this the date that this was filed,  
 4 that I signed this Affidavit?  
 5 Q. You can take a look I think on Page 15 to  
 6 refresh your recollection.  
 7 A. Well, whatever date this Affidavit was  
 8 signed. This says March 9, 2006, is that -- I'm  
 9 sorry. That's not when it was signed.  
 10 22nd day of August, yes, then that would be  
 11 true.  
 12 Q. Okay.  
 13 A. Are we done with this Exhibit?  
 14 Q. We are.  
 15 (A discussion was held off the record.)  
 16 MR. KOFMAN: Let's mark this as  
 17 Raniere-12.  
 18 (First Principles' Third Amended  
 19 Responses to Defendant Stephanie Franco's Second Set  
 20 of Interrogatories to First Principles was received  
 21 and marked Defendant's Exhibit Raniere-12 for  
 22 Identification.)  
 23 BY MR. KOFMAN:  
 24 Q. Raniere-12 is titled First Principles' Third  
 25 Amended Response to Defendant Stephanie Franco's

1 A. Let me read this to be sure that's what I was  
 2 referring to.  
 3 Q. Okay.  
 4 A. I think that this could easily be referring  
 5 to that because it says, "We have spent hundreds of  
 6 thousands of dollars to protect ourselves and this  
 7 very valuable technology that is a culmination of  
 8 thirty years of my life."  
 9 I think there had to be different -- we had  
 10 to hire consultants, people like that in order to  
 11 figure out how to protect from further attacks,  
 12 from further hemorrhaging from the release of this  
 13 copywritten (sic) information. I mean, 55 percent  
 14 of the Mission Statement was put out on the  
 15 internet. And that's the only thing that I wrote  
 16 so that's -- that's a difficult thing. That's not  
 17 good.  
 18 Q. So were those all expenses -- those hundreds  
 19 of thousands, was that all expenses that you  
 20 incurred between the time this was posted on the  
 21 internet and August 22, 2003?  
 22 A. If this was when the document was signed,  
 23 yes.  
 24 Q. So the hundreds of thousands of dollars was  
 25 what was spent between the time that information was

1 Second Set of Interrogatories to First Principles,  
 2 and I know that's a mouthful.  
 3 A. Okay.  
 4 Q. Have you seen this document before?  
 5 A. I'm not sure.  
 6 Q. I'd like you to turn your attention to Page  
 7 21.  
 8 A. (Witness complies.)  
 9 Uh-huh.  
 10 Q. Do you see there it contains references to  
 11 judgments that had been entered against you?  
 12 A. Under "Response" second paragraph it says,  
 13 "Without" -- can I read this?  
 14 Q. Sure, of course.  
 15 A. I don't know if I've ever read this.  
 16 Okay.  
 17 Q. Does this refer to judgments that had been  
 18 entered against you personally?  
 19 A. I don't know. I believe so.  
 20 Q. What was -- was a judgment entered in favor  
 21 of Knox Woods Homeowners' Association against you?  
 22 A. I don't know about that.  
 23 Q. Do you recall an -- do you know who Knox  
 24 Woods Homeowners' Association is?  
 25 A. Yes.

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1 Q. Who are they?  
2 A. They're the condo association that they sort  
3 of do lawns. They're involved -- the sort of things  
4 that you get charges as if your dog goes and does  
5 bad business on someone else's lawn, there's a \$50  
6 fine, things like that.  
7 Q. Okay. Did -- do you have dues that you have  
8 to pay to them?  
9 A. Yes, there are dues.  
10 Q. Was the --  
11 A. I don't know what they are.  
12 Q. Was the judgment entered against you related  
13 to unpaid dues?  
14 A. I have no idea. I don't pay the dues.  
15 Q. Why not?  
16 A. Because it's not my responsibility. I own  
17 half of the house that I live in. I am on the title  
18 half. I am not on the mortgage half. I paid money  
19 up front to put into the house as down payment and  
20 upgrades and options so I'm not financially between  
21 Karen and myself responsible for the homeowners'  
22 dues.  
23 Q. That's Karen Unterreiner?  
24 A. Unterreiner, yes. I believe that's tied into  
25 the mortgage, but I'm not sure.

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1 Q. Okay. Do you -- do you know what the amount  
2 of the judgment was?  
3 A. No. I don't know of the judgment.  
4 Q. The first time you're hearing about the  
5 judgment was today?  
6 A. I think so.  
7 Q. Okay. How about a judgment entered by New  
8 York State Tax Department dated May 11, 1998?  
9 A. Yes.  
10 Q. Are you familiar with that?  
11 A. Yes.  
12 Q. What does that relate to?  
13 A. When I was CEO of Consumers' Buyline -- and I  
14 don't know how much you know about New York State or  
15 how the law works -- we had a printer, apparently,  
16 and this was very remote from me within the  
17 organization. We had purchased some materials that  
18 were printed in Connecticut, and there was some sort  
19 of use tax due that was not filed or some such thing  
20 on those printed things. It is my understanding  
21 that that generated a tax liability, and when a  
22 corporation is moribund it rolls over to the  
23 principals so there's a tax liability in my name.  
24 Q. Okay. Did -- what was the amount of that?  
25 A. I think it was very high. I think with --

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1 you know, I think it started out like 20 or \$30,000  
2 because it was probably a few hundred thousand  
3 dollars of brochures, and I think over the years  
4 it's like a hundred thousand or something,  
5 something I can't pay.  
6 Q. Has that been paid?  
7 A. As far as I know, it hasn't. I don't  
8 necessarily agree with the assessment. It was  
9 fought in audit and because we didn't have money  
10 and because the company was going under, we couldn't  
11 defend ourselves, and so the default was for it to  
12 roll over; but it is as it is.  
13 Q. It is presently a debt of yours?  
14 A. Yes.  
15 Q. Do you consider it ethical not to have paid  
16 the debt?  
17 A. Yes.  
18 Q. Why?  
19 A. Because without going into a lot of the  
20 details of the debt, one, I'm not sure that the debt  
21 was owed at all in the first place by Consumers'  
22 Buyline. It appeared not. Two, we were not because  
23 of lack of funds and certain incompetencies I think  
24 on both sides, both the tax department and our side,  
25 did not get to go through due process with it. And

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1 then it was rolled over unexpectedly. I was not  
2 aware that that would even happen. At this point  
3 in time, ethical or not, I would not have the money  
4 to pay that debt.  
5 Q. How about -- the third thing I think  
6 identified is L.R. Credit Fine LLC, and it's a  
7 judgment dated November 14, 2005.  
8 Do you know what that relates to?  
9 A. No.  
10 Q. You never heard of L.R. Credit Fine LLC?  
11 A. No. I can hypothesize.  
12 Q. What's your understanding?  
13 A. There is a woman, Toni Natalie, who what I  
14 believe took a credit card, actually signed  
15 something in my name and ran up charges. She -- we  
16 went through bankruptcy litigation with her to try  
17 to reveal that this had happened, but that debt was  
18 transferred I think through a number of different  
19 organizations that shuffled the paper. At one  
20 point, I had objected to it; but I think that this  
21 is probably a result of that, although I'm not sure.  
22 Q. Have you made any -- were you aware of this  
23 judgment before today?  
24 A. No.  
25 Q. Did you ever report to a credit card company

1 that Toni Natalie had used your credit card without  
 2 permission?  
 3 A. Yes.  
 4 Q. What was their response?  
 5 A. Okay. They wanted me to send them  
 6 documentation. I sent them documentation, heard  
 7 nothing from them for a long time and then heard  
 8 from another company that had purchased, whatever,  
 9 the paperwork; and I don't know how it went from  
 10 there. Just it's an ongoing thing.  
 11 Q. Okay. That's all for that document.  
 12 MR. KOFMAN: Mark this as Ranieri -- is  
 13 it 12 or 13?  
 14 THE REPORTER: 13.  
 15 MR. KOFMAN: 13.  
 16 (12 Point Mission Statement Bates  
 17 stamped SF 00329 was received and marked Defendant's  
 18 Exhibit Ranieri-13 for Identification.)  
 19 BY MR. KOFMAN:  
 20 Q. Ranieri-13 is a document entitled "12 Point  
 21 Mission Statement By Keith Ranieri."  
 22 Do you recognize this document?  
 23 A. Yes.  
 24 Q. Is that the Mission Statement that you wrote?  
 25 A. This appears to be the Mission Statement I

1 the world -- if the monies and the efforts of the  
 2 people were respected in the world and that was  
 3 controlled ethically, the world would be a better  
 4 place.  
 5 Q. What's the phrase, "within my success plan"  
 6 mean?  
 7 A. That means that whatever a person sees in  
 8 life -- you're not saying to the person, "Look, you  
 9 must earn a lot of money and you must control the  
 10 money."  
 11 It is within what you think, you envision  
 12 yourself in the world, what your -- your vision of  
 13 success for yourself is. You will hold the efforts  
 14 that people back money with as something sacred, and  
 15 that money will not be just disregarded.  
 16 Q. Okay. Do you have a success plan?  
 17 A. Yes.  
 18 Q. What is your success plan?  
 19 A. To try to inspire joy in the world, and it  
 20 changes. Right now, to try to inspire a nonviolent  
 21 conflict resolution in Mexico. I devote quite a bit  
 22 of thought and effort to that.  
 23 I've worked on a program called Human  
 24 Essentials which are practices that all the  
 25 different people, classes within Mexico can do that

1 wrote, yes.  
 2 Q. Looking at the next-to-last Mission  
 3 Statement, the sentence, "I pledge to ethically  
 4 control as much of the money, wealth and resources  
 5 of the world as possible within my success plan" --  
 6 A. Uh-huh.  
 7 Q. -- can you explain to me what that means?  
 8 THE WITNESS: Well, this is under  
 9 confidence; yes?  
 10 MR. CAMPION: It is.  
 11 A. Okay. If you think of the value of money --  
 12 if you think of the value of money, and money is  
 13 made valuable by people's efforts, the reason why  
 14 money can work is if people are willing to work for  
 15 it. And a metaphor that is used is if there was a  
 16 slave auction downtown and slaves were for sale, you  
 17 know, would you go and buy them? And a lot of  
 18 people say, "Oh, I'd have nothing to do with it,  
 19 nothing to do with it." But wouldn't you buy them  
 20 to set them free?  
 21 Now, if there's a certain amount of money in  
 22 the world and there's people's efforts that are used  
 23 to back it, if that money is controlled by people  
 24 who are not ethical, those efforts are being  
 25 harnessed in a not ethical way. I believe that if

1 will inspire nonviolent conflict resolution. And I  
 2 can go into more detail if you want.  
 3 Q. Is it fair to say your success plan doesn't  
 4 include getting enough money to pay the State of New  
 5 York tax obligation?  
 6 MR. CAMPION: I object to the form of  
 7 that question.  
 8 Counsel, you know better than that.  
 9 MR. McGUIRE: Join.  
 10 MR. KOFMAN: I'll withdraw the question.  
 11 BY MR. KOFMAN:  
 12 Q. Looking at the next Mission Statement -- and,  
 13 by the way, what is -- can you explain to me just  
 14 generally what the Mission Statement is?  
 15 A. Originally the Mission Statement was an  
 16 expression. It's more of a poem in some ways.  
 17 it's -- I wrote it pretty quickly, and it contains  
 18 numerous errors. We've actually had not only  
 19 numerous suggestions but a possibility of changing  
 20 different things, but it's seen in itself as a --  
 21 more of a poetic expression. It expresses many of  
 22 the ideas in ESP, but it also expresses some of the  
 23 legal con -- the legal concepts of confidentiality  
 24 that are important, and we want to be sure that  
 25 people not only in signing agreements but in a

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1 written sense under -- in a verbal sense understand  
 2 that this information is confidential and to be  
 3 guarded. It was our intent when we began ESP to  
 4 find every way possible to guard the information as  
 5 confidential, as our private property, and it was  
 6 incorporated in this.  
 7 Q. Would you agree that these are fundamental  
 8 precepts of the organization?  
 9 A. I'm not sure what you mean by "fundamental  
 10 precepts."  
 11 Q. Okay. Am I correct that the 12 Point Mission  
 12 Statement is recited before each class at NXIVM?  
 13 A. Yes, unless they're in a group of classes.  
 14 Then it's recited once.  
 15 Q. Okay. Looking at the last --  
 16 A. I need to make an amendment to that.  
 17 Q. Sure.  
 18 A. In certain programs. There are certain  
 19 programs where it is not recited.  
 20 Q. Which programs is it recited in?  
 21 A. Ethos, the Intensive; but not Origins. You  
 22 know, I don't know if it's recited in the Ethicist  
 23 training. It won't be recited in Human Essentials.  
 24 Q. Looking at the last paragraph of the Mission  
 25 Statement, the last sentence says, "I pledge to

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1 share and enroll people in ESP and its mission for  
 2 myself and to help make the world a better place to  
 3 live."  
 4 A. Uh-huh.  
 5 Q. Can someone fulfill the mission of NXIVM  
 6 without seeking to enroll other people in the  
 7 course?  
 8 A. Actually, yes --  
 9 Q. Where does --  
 10 A. But --  
 11 Q. Does it say that anywhere here?  
 12 A. But it depends on how you define  
 13 "enrollment."  
 14 The word enrollment can be to go out and  
 15 actively try to recruit, but the enrollment in the  
 16 way that we use it happens naturally when you  
 17 believe in something. If I go out and I -- I'm a  
 18 vegetarian, for example. I enroll people in  
 19 vegetarianism. Whether they become a vegetarian or  
 20 not -- whether my attorneys become a vegetarian or  
 21 not, they see me genuinely engaged in that; and  
 22 either I stand as an example for someone to do it or  
 23 not to do it or not enough of an example to change  
 24 where they are, but that's the nature of enrollment.  
 25 Q. So in this sense, the term -- when you use

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1 the term "enroll," it can include a passive act?  
 2 A. Yes, absolutely.  
 3 THE VIDEOGRAPHER: Excuse me. We have  
 4 to change tapes.  
 5 MR. KOFMAN: Okay.  
 6 (A discussion was held off the record.)  
 7 THE VIDEOGRAPHER: We're back on the  
 8 record. The time is 11:54.  
 9 MR. KOFMAN: Please mark this as  
 10 Raniere-14.  
 11 (Confidential five-page memorandum to  
 12 Keith Raniere, Nancy Salzman from Joseph J. O'Hara  
 13 dated March 1, 2004, was received and marked  
 14 Defendant's Exhibit Raniere-14 for Identification.)  
 15 BY MR. KOFMAN:  
 16 Q. I'm going to show you a document that we've  
 17 marked as Raniere-14. It is a four-page (sic)  
 18 document that was produced to us in discovery, and  
 19 it claims to be a Memorandum from Joseph O --  
 20 J. O'Hara to Keith Raniere and Nancy Salzman.  
 21 A. Yes.  
 22 Q. Have you seen that document before?  
 23 A. I'm not exactly sure.  
 24 Q. Does that mean you don't recall?  
 25 A. There are two comments. Without reading this

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1 document, was this produced by Joe O'Hara, or was  
 2 this produced by us?  
 3 Q. It's got a Bates stamp number indicating that  
 4 it was pro -- strike that.  
 5 Would that make a difference as to whether or  
 6 not you've seen it before?  
 7 A. That would make a difference as to whether or  
 8 not I would trust that the document has integrity.  
 9 Q. Can you explain that?  
 10 A. I believe that Joe O'Hara is not honest.  
 11 Q. Okay. Looking at that document, can you tell  
 12 whether you've seen it before, without knowing when  
 13 it was produced and whether -- who produced it?  
 14 A. It's hard to tell and it's quite a long  
 15 document so...  
 16 Q. Anything in that document ring a bell that  
 17 you've seen this before?  
 18 You can take your time and read it.  
 19 A. Yes. I've seen something I believe like this  
 20 before.  
 21 Q. Would that have been back in 2004?  
 22 A. It sounds like a possible date. I'm not  
 23 sure. Joe O'Hara had taken a VIP training program  
 24 with his girlfriend who at the time was, well,  
 25 pretty dominant of him and pretty hostile; so I

1 think it was 2004, although I'm not positive.  
 2 Q. Is it -- when you bring up his girlfriend,  
 3 you're saying that she may have influenced his  
 4 perceptions of the group?  
 5 A. I definitely believe not only that she  
 6 influenced his perceptions of the group but maybe  
 7 influenced many of his actions.  
 8 Q. Did you or Ms. Salzman ask Mr. O'Hara to take  
 9 the class, the VIP training class?  
 10 A. I did not. I don't know if she did.  
 11 Q. Did you attend the training session that he  
 12 refers to which took place between February 18  
 13 through February 22, 2004?  
 14 A. No. It -- yeah -- no, I have never attended  
 15 a training in New York City.  
 16 Q. Looking at this, on Page 2 he refers to  
 17 Content.  
 18 A. Page 2, Content, yes, Number III.  
 19 Q. If you look --  
 20 A. Section III.  
 21 Q. And then if you look on the next page, it  
 22 lists a number of items. The next page, Item 4 --  
 23 A. Go ahead.  
 24 Q. -- concerns the Explorations of Meaning  
 25 sessions.

1 we changed it, but I don't think so.  
 2 Q. Okay. Paragraph 6 he refers to the ESP  
 3 philosophy taking on too many "big time opponents"  
 4 at once (e.g., Professional Sports, the U.S. Tax  
 5 System, Labor Unions, Attorneys General, Religion,  
 6 et cetera.  
 7 What is taught in NXIVM classes about  
 8 professional sports?  
 9 A. Now, I don't know what he's talking about.  
 10 At times, Joe was extremely erratic. At the time  
 11 when I interacted with Joe, I had hoped that it was  
 12 just honest erraticism; but after we found out that  
 13 he was stealing money from us, it sheds it in a  
 14 different light, and I do believe he was stealing  
 15 money from us.  
 16 Q. Do you know one way or the other as to  
 17 whether anything was represented in NXIVM training  
 18 sessions about professional sports?  
 19 A. Probably somewhere.  
 20 Q. Do you know what's represented?  
 21 A. No.  
 22 Q. How about the U.S. tax system? You mentioned  
 23 yesterday that you had opinions about that -- about  
 24 the tax system. Are those expressed in the NXIVM  
 25 training sessions?

1 Do you recall reading that paragraph in 2004?  
 2 A. No, but I may have. I have -- I agree and --  
 3 let's see.  
 4 (Witness reads to himself.)  
 5 I don't know. I think I had a  
 6 conversation with Joe at one point where he asked  
 7 what I thought in that, and I think that was pretty  
 8 resolved so I -- you know, this may have been in  
 9 this document. I'm not sure.  
 10 Q. When you say, "that was pretty resolved," let  
 11 me be clear. He's writing here about, "Exploration  
 12 of Meaning (EM) sessions may have gone over-the-line  
 13 in terms of what constitutes counseling/therapy."  
 14 A. Uh-huh.  
 15 Q. What's your -- how do you understand that  
 16 that issue was resolved?  
 17 A. Well, the question is in New York State and  
 18 different states what constitutes psychology; and  
 19 his ultimate advice to us after consulting the laws  
 20 but not just in New York State but in numerous  
 21 states was that it does not go over the line.  
 22 Q. Okay. Do you know if he put that advice in a  
 23 written document?  
 24 A. I don't know. I do know if it went over the  
 25 line, we would have changed it; and I don't know if

1 A. I don't know if it's expressed in the  
 2 curriculum, but people have asked me in forums.  
 3 Q. How about labor unions? Were those discussed  
 4 either in the curriculum or in forums?  
 5 A. I think in Shifter, we don't necessarily talk  
 6 about labor unions, per se, but we may reference a  
 7 union or a charity. I know we referenced things  
 8 like that to show how, for example, a not-for-profit  
 9 can be used as a device to cheat by a malintended  
 10 person.  
 11 Q. And is it your -- was it represented by you  
 12 that labor unions are devices to cheat?  
 13 A. No.  
 14 Q. What is said about Attorneys General in NXIVM  
 15 training sessions, either in the curricula or the  
 16 forum?  
 17 A. Well, as far as the curriculum goes, I don't  
 18 think there's anything. As far as the forum goes,  
 19 there have probably been questions relating to  
 20 Attorneys General.  
 21 Q. Such as?  
 22 A. I, you know, what do I feel about government;  
 23 what do I feel about capitalism; what do I feel  
 24 about socialism, you know, the current structure.  
 25 What do you think about having a District Attorney

1 prosecute crime. Should it be privatized; should it  
2 not be privatized. I mean, there are many contexts  
3 it can come up.

4 Q. Have you been asked specifically what about  
5 -- what do you think about attorney -- State  
6 Attorney Generals?

7 A. I don't know. I don't remember it.

8 Q. Have you been asked about your experience  
9 with States' Attorneys General in connection with  
10 Consumers' Buyline?

11 A. Yeah. I'm not -- I don't recall, but I  
12 imagine I would be.

13 Q. And what was your -- what would have been  
14 your response?

15 A. Well, State Attorney Generals are  
16 politically-appointed positions. They normally have  
17 as arms and legs people who are career people  
18 working through them, so at times Attorney Generals  
19 are politically motivated. Sometimes they have  
20 aspirations for higher positions. Sometimes they  
21 are people who have worked hard to get to the  
22 position to make changes and make good changes.

23 It's interesting. There is an organization  
24 of Attorney Generals called NAAG, N-A-A-G, which is  
25 the National Association of Attorneys General. I --

1 A. Except for the one "Our School," I don't find  
2 any of those representations true or -- that's not  
3 something I would say, and some of them I would  
4 blatantly disagree with but --

5 Q. Have you ever heard anyone conducting a  
6 NXIVM training session make these representations?

7 A. People that conduct NXIVM training sessions  
8 have a certain degree of freedom to offer their own  
9 opinions and things like that. I certainly would  
10 not uphold these representations being made, and I  
11 have spoken out against most of them except I don't  
12 understand the representation "Our School," except  
13 maybe he believes that -- I mean, I don't think  
14 we're a school, per se, so if someone said the word  
15 "school," it's something that I would discourage and  
16 that wouldn't be correct, you know, and I slip into  
17 saying things like school, also, so that's a  
18 possibility. It's always a difficult thing.

19 You know, we're an organization. We provide  
20 training. We provide education to a degree, but  
21 certainly cancer being caused by self-esteem, I  
22 would -- that would probably be cause for ethical  
23 review if someone said such a thing.

24 Q. Have you heard someone say at a NXIVM  
25 training session, "We could not re-build the

1 it is my belief -- I met some Attorneys General --  
2 Attorney Generals that I thought were great people.  
3 I thought they were great in what they did, and I  
4 thought it was an important position. I think the  
5 position of Attorney General is an extremely  
6 important position, but I don't necessarily think  
7 the people that get into that position always live  
8 up to it.

9 Q. And is that understand -- is that  
10 understanding based on your own experiences with  
11 Consumers' Buyline?

12 A. I met some Attorneys General that it was my  
13 opinion that they were great, and I met others that  
14 I felt at least with respect to us were more  
15 politically motivated.

16 Q. I'd like you to look on this document at  
17 Paragraph 8. It's on Page 3, and it carries over to  
18 Page 4.

19 A. Okay, yes.

20 Q. And he refers to a number of representations  
21 that he claims to have heard at this training  
22 session.

23 A. Uh-huh.

24 Q. Have you made any of those representations in  
25 NXIVM training sessions?

1 Pyramids in Egypt" without (sic) existing  
2 construction -- "with our existing construction  
3 technology and techniques"?

4 A. Well, I believe it's unknown if we could.  
5 They've done some actually interesting things trying  
6 to do that. I don't think it's per se part of NXIVM  
7 training but...

8 Q. With all due respect, that's not my question.  
9 My question is have you heard someone say that at a  
10 NXIVM training session?

11 A. Not that I can recall.

12 Q. Okay. Have you heard someone say that  
13 Keith Raniere is the smartest man in the world --

14 A. No.

15 Q. -- at a training session?

16 A. No.

17 Q. Have you heard someone say at a training  
18 session that psychotherapy doesn't work?

19 A. I might have heard students say things like  
20 that.

21 Q. Okay.

22 A. By the way, I believe psychotherapy does  
23 work.

24 Q. Does?

25 A. Yes.

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1 Q. Okay. Looking under -- on Page 4 under  
 2 "Miscellaneous," he says, "I think that no animals  
 3 should be allowed to 'sit in' on the training. In  
 4 this regard, the liability potential concerning such  
 5 animals greatly outweighs their 'cute factor.'"  
 6 Ever come to your attention that animals  
 7 were sitting in on the NXIVM training sessions?  
 8 A. There was a blind woman who had a dog, and  
 9 that dog sat in on NXIVM training sessions that she  
 10 was involved in. She was a student. I don't know  
 11 -- I don't think she ever decided to become a coach,  
 12 but I felt that in that case it was important.  
 13 Q. Do you know if she was at this VIP training  
 14 center in February?  
 15 A. No. She was not, I believe. I think she's  
 16 only gone to trainings in Albany.  
 17 Q. Have you ever heard of any other instance in  
 18 which an animal was allowed to sit in on a training  
 19 session?  
 20 A. You mean animals as in furry things, not  
 21 people. I'm teasing.  
 22 No.  
 23 Q. No?  
 24 A. No.  
 25 Q. Okay. You can put that document down.

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1 MR. KOFMAN: What time is it? I've got  
 2 one more area.  
 3 MR. CAMPION: Ten after.  
 4 MR. KOFMAN: All right.  
 5 MR. McGUIRE: After 6.  
 6 MR. LEONARD: It only feels that way.  
 7 BY MR. KOFMAN:  
 8 Q. Are you aware of any instances in which  
 9 individuals have had breakdowns after doing an  
 10 Exploration of Meaning session?  
 11 A. After doing an Exploration of Meaning  
 12 session, no, and I would ask that you define  
 13 "breakdowns."  
 14 Q. Have had some sort of psychotic episode  
 15 after taking your class.  
 16 A. That's a different question.  
 17 Q. I understand.  
 18 A. I'm not capable of evaluating psychotic  
 19 episodes. I have known of instances where one woman  
 20 in particular was in a training -- and, actually,  
 21 there were doctors in the training, too. She was  
 22 brought to a hospital in Albany and evaluated by a  
 23 psychiatrist there. From my understanding, the  
 24 psychiatrist thought she was fine.  
 25 Q. Okay.

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1 A. Then she went back to her hotel and at a  
 2 later point -- I think it was that same night --  
 3 continued and was taken and then evaluated as having  
 4 -- I don't know if it was a psychotic episode but it  
 5 may well have been.  
 6 Q. Does NXIVM have medical personnel on hand at  
 7 its Intensives?  
 8 A. At times.  
 9 Q. But it's not a requirement?  
 10 A. It is not a requirement.  
 11 Q. Okay. I'd like to go back. Yesterday we  
 12 talked a little bit about the Student Enrollment  
 13 Application and I think at that time --  
 14 A. Are we done with this document?  
 15 Q. Yes, we are.  
 16 At that time, you indicated to me that you  
 17 were having a little difficulty reading --  
 18 A. Yes.  
 19 Q. -- the one I produced to you. So I've gotten  
 20 a copy where the Student Terms and Conditions are  
 21 clearer.  
 22 A. Thank you.  
 23 Q. It's a different document which I'd like to  
 24 mark as Ranieri 14 or 15?  
 25 MR. McGUIRE: 15.

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1 MR. KOFMAN: 15.  
 2 (One-page Student Enrollment Application  
 3 for Aaron Kassin marked Confidential was received  
 4 and marked Defendant's Exhibit Ranieri-15 for  
 5 Identification.)  
 6 BY MR. KOFMAN:  
 7 Q. Ranieri-15 is a one-page document. It says  
 8 Student Enrollment Application of Aaron Kassin, and  
 9 it was produced to us as a single page.  
 10 MR. McGUIRE: You got another copy over  
 11 there?  
 12 MR. KOFMAN: Did I not produce it over  
 13 on this side, or are there any extras?  
 14 MR. LEONARD: We're okay.  
 15 Q. Is that at least the first page of the form  
 16 of Student Enrollment Application that NXIVM uses?  
 17 A. I can't tell. It looks like the bottom was  
 18 cut off, but probably just a photocopying error. It  
 19 doesn't have a revision date.  
 20 Q. Taking a look under "Student Terms and  
 21 Conditions" at Paragraph 1 --  
 22 A. Yes.  
 23 Q. -- it says, "These materials, methods and  
 24 information cannot be copied, duplicated,  
 25 transmitted, taught or otherwise used" --

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1 A. Hold on. I'm in the wrong place.  
 2 Okay. I'm sorry. Yes, I'm with you.  
 3 Q. What are you referring to as the "materials"  
 4 there in that sentence?  
 5 A. It says, "All materials, methods and  
 6 information contained in and represented through  
 7 Executive Success Programs (ESP) are essential  
 8 assets of ESP acquired at great time and expense."  
 9 So I guess that's all materials, methods and  
 10 information.  
 11 Q. What do you mean by the term "materials"?  
 12 A. When you say what do I mean, I am not the  
 13 person who finally wrote this. This is a lawyer.  
 14 Q. Okay. You did review it, though, with a  
 15 lawyer; correct?  
 16 A. I probably -- I -- I don't think I reviewed  
 17 it with a lawyer. I believe I put in certain things  
 18 from my other company that went into a hopper, and  
 19 the lawyer came out with the final stuff.  
 20 Q. Did you review it after the lawyer came out  
 21 with the final stuff?  
 22 A. Doubtful.  
 23 Q. Okay. Were you concerned as to that it be  
 24 sufficiently protective?  
 25 A. Yes.

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1 Q. But you didn't review it after the lawyer  
 2 drafted it?  
 3 A. I don't feel I'm good enough.  
 4 Q. Okay. Do you have an understanding sitting  
 5 here today what's meant by the term "materials"?  
 6 A. I think I do. I mean, from a layperson's  
 7 point of view, it appears to be everything.  
 8 Q. "Everything" meaning what?  
 9 A. Any materials, any papers that I get, any  
 10 pictures, any -- I don't know -- tapes, any -- it  
 11 says "methods" also and "information" which means  
 12 nonverbal, verbal; any data.  
 13 Q. So the information can include things that  
 14 are nonverbal?  
 15 A. I imagine.  
 16 Q. Such as what?  
 17 A. If someone, for example, was doing an  
 18 artistic presentation and they did a certain move,  
 19 that probably would be considered that information.  
 20 Q. And they could not disclose that move outside  
 21 of the walls of NXIVM?  
 22 A. Yeah, probably.  
 23 Q. Would it be safe to say that information is  
 24 anything that they hear during the course of a NXIVM  
 25 training session --

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1 A. Yes, I --  
 2 Q. -- or see?  
 3 A. From a layperson's perspective, yes.  
 4 Q. Okay, and it says that the infor --  
 5 "materials, methods and information cannot be  
 6 copied, duplicated, transmitted, taught or otherwise  
 7 used."  
 8 What do you understand the phrase "otherwise  
 9 used" to mean?  
 10 A. Well, on an ethical level -- if you're  
 11 commenting on the rule, it means that the first  
 12 portion of this clause, the "materials, methods and  
 13 information cannot be copied, duplicated,  
 14 transmitted, taught." In other words, I'm taking  
 15 materials and somehow getting them over to you; and  
 16 then I'm also potentially using them, and whatever  
 17 is not covered in what is listed is "or otherwise  
 18 used." So not only transmitted but also  
 19 transformed, also utilized for other purposes at  
 20 all. I think it's somewhat inclusive.  
 21 Q. Would "use" include talking about it with  
 22 family members?  
 23 A. Certain aspects. You know, talking about my  
 24 experience is one thing. Talking -- telling my  
 25 family members what the materials are is another.

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1 Q. Would this paragraph prohibit me from going  
 2 to my wife after I took one of your training  
 3 sessions and saying, you know, I saw this guy named  
 4 Keith Raniere, and he wants me to call him Vanguard  
 5 and bow down to him when he walks in the room; is  
 6 that -- would that violate this paragraph?  
 7 A. In ethic or --  
 8 MR. CAMPION: Object to the form of that  
 9 question.  
 10 Q. Would it be your understanding that that  
 11 would violate this paragraph?  
 12 A. In ethic or in rule?  
 13 Q. In rule.  
 14 A. Probably.  
 15 Q. Okay.  
 16 A. But we are an ethical organization, and  
 17 that's why and what we instruct the attorneys to do  
 18 is try to make these in such a way that it allows  
 19 for that. When a person comes in and takes the  
 20 course, they sign a long form which is more explicit  
 21 about derivative works and things like that. So we  
 22 encourage people to go and talk about their  
 23 experiences, both positive and negative, with their  
 24 families and they do.  
 25 Q. But that might violate the strict terms of

1 this paragraph?  
 2 A. Well, if they were to go and reveal things  
 3 that were trade secrets, it might. What you said,  
 4 depending on a number of circumstances, might  
 5 violate the rule of this but certainly not the  
 6 ethic.  
 7 Q. Would it depend upon the person's intent?  
 8 A. It depends on more than that, but yes.  
 9 Q. That would be one factor?  
 10 A. Yes.  
 11 Q. What would the other things it depends on be?  
 12 A. Are they a competitor or not and have they  
 13 come into the program under provisional means so  
 14 that if they start describing this to their wife,  
 15 for example, who might be a therapist or might be a  
 16 trainer for Anthony Robbins or something like that  
 17 and you gave me a statement, and the actual  
 18 statement you gave me I suspect would not be a  
 19 problem under the Rules, but a generalized form of  
 20 that statement where someone starts to say, "This  
 21 question was asked. This specifically is what  
 22 happened," may violate it if it is a competitor  
 23 trans -- or transmitting it to a competitor who  
 24 happens to be the person's wife.  
 25 Q. So two different people can say the same

1 AFTERNOON SESSION  
 2  
 3 THE VIDEOGRAPHER: We're back on the  
 4 record at 1:17.  
 5  
 6 KEITH ALAN RANIERE, previously  
 7 sworn, resumed the stand and testifies on his oath  
 8 as follows:  
 9  
 10 CONTINUED DIRECT EXAMINATION BY MR. KOFMAN:  
 11 Q. Okay. Mr. Raniere, I have a few more  
 12 questions for you before concluding my portion of  
 13 the deposition.  
 14 I want to make sure I understand a few areas.  
 15 Did any of your attorneys in this case ever instruct  
 16 you to preserve documents?  
 17 A. No, I don't believe so. Instructed that if I  
 18 had any e-mails they shouldn't be deleted. I should  
 19 go through them or --  
 20 Q. Okay. Who gave you that instruction?  
 21 A. Bob Leonard.  
 22 Q. Okay. Anybody before then?  
 23 A. I didn't have any attorneys in this case  
 24 before then.  
 25 Q. Did any of NXIVM's attorneys ever give you

1 thing, and in one case it would violate the rule and  
 2 in one case it would not?  
 3 A. Yes.  
 4 Q. Okay.  
 5 MR. KOFMAN: I have no other questions  
 6 at this point. Let's -- maybe we should take our  
 7 lunch break.  
 8 MR. CAMPION: Sure.  
 9 MR. KOFMAN: I'll check my notes and see  
 10 if I have anything in follow-up.  
 11 MR. CAMPION: Back here at 1:15.  
 12 THE VIDEOGRAPHER: Going off the record  
 13 at 12:20.  
 14  
 15 (Witness excused.)  
 16 (At this point, the luncheon recess was  
 17 taken.)  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 that information?  
 2 A. No.  
 3 Q. Did anybody --  
 4 A. Not specifically.  
 5 Q. Did anybody from NXIVM -- did anyone from  
 6 NXIVM itself ever ask you to preserve documents or  
 7 e-mails?  
 8 A. No.  
 9 Q. Did Kristin Keeffe ever show you copies of  
 10 the document production requests that were served in  
 11 this matter?  
 12 A. She's shown me a number of different things,  
 13 things that related to me. I -- I'm sure I didn't  
 14 see the whole document request, but I know that  
 15 there were -- there was a document request for  
 16 things from Nycap@rr.com.  
 17 Q. Any other requests that you believe she  
 18 showed you?  
 19 A. Well, there is a document request of me.  
 20 That's all I know.  
 21 Q. How about document requests directed to  
 22 NXIVM? Did she show you any of those?  
 23 A. No.  
 24 Q. I'm sorry. You have to answer verbally.  
 25 A. Oh, no.

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1 Q. Did she read to you over the phone or  
 2 communicate orally to ask you to look for documents  
 3 that had been requested of NXIVM?  
 4 A. She's requested me to look for certain  
 5 things, but a lot of the times she would request  
 6 something I don't have them, for example, audio  
 7 recordings or things like that.  
 8 Q. Did she -- when she would ask you to look for  
 9 certain things, how would she communicate with you?  
 10 Was it in person or over the phone?  
 11 A. Either or.  
 12 Q. Okay. Did anyone from -- anyone assist you  
 13 in looking for responsive documents or materials?  
 14 A. I'm not sure because there was a storage bin  
 15 that has my stuff in it that I allowed NXIVM people  
 16 to go through. So I did not, per se, look for it;  
 17 but anything that was in there would have been given  
 18 over.  
 19 Q. Where is the storage bin located?  
 20 A. I'm not the person who rents it, but it has  
 21 my stuff in it. I think it's Exit 9 Storage, but  
 22 I'm not sure. There is a few different storage  
 23 facilities.  
 24 Q. And this is -- do you know who from NXIVM  
 25 went through it?

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1 A. No.  
 2 Q. This is material that's in addition to what  
 3 you keep at your home?  
 4 A. Yes.  
 5 Q. Okay. Did anyone assist you in looking for  
 6 materials in your home?  
 7 A. No.  
 8 Q. Okay. It was you alone who did the search?  
 9 A. Yes.  
 10 Q. Where does NXIVM presently maintain offices?  
 11 A. I don't know all the places. There is an  
 12 office in Upstate New York. There's -- I think  
 13 there's an office near -- near the 455 New Karner  
 14 Road complex. I think there's an office in  
 15 Monterrey, Mexico. I think there's also an office  
 16 in Mexico City, but those are not directly NXIVM  
 17 offices, I believe. I think they're offices in some  
 18 sort of either franchise agreement or something like  
 19 that. I'm not sure of the nature of that agreement.  
 20 Q. The office in Upstate New York, where is that  
 21 located?  
 22 A. I'm not exactly sure.  
 23 Q. Any idea what city or county?  
 24 A. I think it's in Niagara. Yeah, I think it's  
 25 in Niagara.

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1 Q. Is that -- what's that office used for?  
 2 A. I don't know.  
 3 Q. Have you ever submitted Rational Inquiry  
 4 Method to peer review?  
 5 A. No, not that I -- not in any form.  
 6 Q. Have you ever written anything about it to  
 7 scientific journals?  
 8 A. To scientific journals. I don't know if  
 9 that's considered a scientific journal, possibly.  
 10 Q. What -- what are you thinking of?  
 11 A. There is a -- a magazine that is distributed  
 12 to the academic community. I would probably not  
 13 refer to it as a journal, but I've written articles  
 14 in there.  
 15 Q. What's the name of the magazine?  
 16 A. Conocimiento is it, I think. It's Spanish.  
 17 I don't speak Spanish.  
 18 Q. Somebody translated the articles into Spanish  
 19 for you?  
 20 A. Yes.  
 21 Q. When did you start writing articles for  
 22 Conocimiento?  
 23 A. About three years ago, I think.  
 24 Q. Did you get paid for these articles?  
 25 A. No.

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1 Q. I'm sorry. You have to speak up.  
 2 A. Oh, I'm sorry. No.  
 3 Q. And how many articles would you say you've  
 4 written?  
 5 A. Um, there are two primary ways that I write  
 6 an article. One, I write it directly myself; and  
 7 the other I write it in collaboration with someone  
 8 where I download the concepts, so to speak. I speak  
 9 with them about some of the philosophical things in  
 10 the article, some of the structure of the article,  
 11 and they write it. Sometimes I will write portions  
 12 of those, so that's how the articles are normally  
 13 written.  
 14 Q. Are all of the articles in your name, or do  
 15 you share a byline with someone on any of them?  
 16 A. I share a byline with people on some of them.  
 17 Q. Who are some of the people you share bylines  
 18 with?  
 19 A. Ivy Nevares spelled Ivy, I-v-y.  
 20 Q. I think you mentioned her yesterday.  
 21 Anyone else?  
 22 A. Farouk Rojas translates, and as a translator  
 23 he and Ivy who are both bilingual may change content  
 24 to some degree. So he's up in the byline, too, but  
 25 as a translator.

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1 Q. Where is Conocimiento published?  
 2 A. I believe it's Monterrey, Mexico.  
 3 Q. How did you come to write articles for -- on  
 4 Rational Inquiry Method for Conocimiento?  
 5 A. The head of Conocimiento's name is Luis Todd  
 6 who he's like the representative to UNESCO in the  
 7 United Nations. He's head of one of the major  
 8 university medical schools. He -- in front of the  
 9 book, actually, there is his biography. He opened  
 10 something like 60 different majors, and he is a  
 11 prominent person.  
 12 He took our course and believes very strongly  
 13 in what we do, so he wrote the Forward to the book  
 14 that I published and also allows us to have a  
 15 column, if you will, or an article section within  
 16 his magazine.  
 17 Q. How many of these columns have you written?  
 18 A. Oh, over three years I've written probably  
 19 about -- I'm guessing -- 70.  
 20 Q. Have you retained copies of these articles?  
 21 A. Yes.  
 22 MR. KOFMAN: Okay. I'm going to make a  
 23 request for copies of the articles that Mr. Ranieri  
 24 has written for Conocimiento, and I'll follow that  
 25 up in the letter.

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1 MR. CAMPION: We'll consider it then,  
 2 yes.  
 3 MR. KOFMAN: Okay.  
 4 (Request.)  
 5 THE WITNESS: They are not to be  
 6 distributed outside of this, yes?  
 7 MR. KOFMAN: They would be subject --  
 8 your attorneys have the right to designate them as  
 9 confidential pursuant to the Order entered by the  
 10 Court.  
 11 THE WITNESS: Also the Forward?  
 12 MR. CAMPION: We're going to discuss  
 13 that later.  
 14 THE WITNESS: Thank you.  
 15 BY MR. KOFMAN:  
 16 Q. Okay. You mentioned that I believe that you  
 17 published a book.  
 18 A. Yes.  
 19 Q. What's the name of the book?  
 20 A. The Odin and the Sphinx.  
 21 Q. What is it?  
 22 A. Odin and the Sphinx.  
 23 Q. What's the name of the publisher?  
 24 A. Ethical Publishing.  
 25 Q. Is that an in print that you're involved

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1 with?  
 2 A. I don't know what you mean by "involved  
 3 with."  
 4 Q. Are you familiar with the term Vanity Press?  
 5 A. No.  
 6 Q. Does Ethical Press publish -- has Ethical  
 7 Press published any books other than The Odin and  
 8 the Sphinx?  
 9 A. No.  
 10 Q. It's no?  
 11 A. No. That's correct.  
 12 Q. Okay. Have you received any royalties from  
 13 publication of this?  
 14 A. No.  
 15 Q. And you indicated that -- strike that.  
 16 Is this a work of fiction or nonfiction?  
 17 A. I think it's probably both. There are --  
 18 it's a compendium of articles. Some of them are  
 19 more fictional. Some of them are more academic.  
 20 Some of them are quite academic, and some of them  
 21 are quite fictional.  
 22 Q. Okay. Are these books sold at NXIVM training  
 23 centers?  
 24 A. I imagine so. I don't know for sure.  
 25 Q. Have you received any royalties from the

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1 book?  
 2 A. No.  
 3 Q. Do you have any agreement to receive  
 4 royalties?  
 5 A. No.  
 6 Q. Does the book or any of the articles in the  
 7 book discuss the Rational Inquiry Method?  
 8 A. Superficially probably. I mean, it is  
 9 mentioned.  
 10 Q. Okay. Do any of the articles that you've  
 11 written for Conocimiento contain what you'd consider  
 12 trade secrets of NXIVM?  
 13 A. No.  
 14 Q. Does it discuss particulars of the Rational  
 15 Inquiry Method?  
 16 A. No.  
 17 Q. How about The Odin and the Sphinx, does that  
 18 contain any trade secrets?  
 19 A. Those are articles. No.  
 20 Q. When was the book published, Odin and the  
 21 Sphinx?  
 22 A. A year ago, something like that. I am not  
 23 sure of the exact date.  
 24 Q. Do you know how many copies were published?  
 25 A. I think there was -- it's a small initial run

1 like 5,000 or something.  
 2 Q. Do you maintain copies?  
 3 A. I have a few.  
 4 MR. KOFMAN: I'm going to make a request  
 5 for that as well.  
 6 MR. CAMPION: Put it in the letter.  
 7 MR. KOFMAN: Okay.  
 8 (Request.)  
 9 Q. Who wrote the Forward to that book? Is that  
 10 Mr. Todd?  
 11 A. Luis Todd, yes.  
 12 Q. Have you ever been -- strike that.  
 13 Is there a reason that you haven't submitted  
 14 Rational Inquiry Method to peer review?  
 15 A. I think there are several reasons. We want  
 16 to have more solid research into it. The research  
 17 and things like that we've done is preliminary, and  
 18 also because of this lawsuit there are a lot of  
 19 restrictions and constrictions relating to that.  
 20 Q. When you say the research that you've done is  
 21 preliminary, what do you mean?  
 22 A. The psychological assay, the psych -- what  
 23 you call maybe the psychological study, it's just  
 24 sort of an entry point into research. You know,  
 25 when you do research the first thing you want to

1 A. I'm sorry. I didn't hear.  
 2 Q. I'm sorry. Have you ever been asked by  
 3 anyone at NXIVM to identify who NXIVM's competitors  
 4 are?  
 5 A. I've been asked what my opinions are on that,  
 6 yes.  
 7 Q. Who were you asked that by?  
 8 A. Arlen, I think Kristin, I think I have had a  
 9 discussion with Nancy about it. I think not  
 10 pertaining to a legal case at all various other  
 11 people who are marketers.  
 12 Q. And what have you told those people other  
 13 than your attorney, or other than Arlen Olsen what  
 14 have you told them as to who NXIVM's competitors  
 15 are?  
 16 A. Well, I think as a general rule, as I  
 17 expressed before, anyone who wants to increase joy.  
 18 Q. Okay. Have you ever made a list of who  
 19 specific -- who are -- what are specific entities  
 20 that are competitors?  
 21 A. No. I think I've spoken of people and  
 22 directed people on how to find -- like, for example,  
 23 people in the -- in the Forbes article there were a  
 24 number of firms that were seen as competitors to us  
 25 that were -- we were nestled in as far as in a list.

1 find out if there's a legitimate effect, and then  
 2 you want to examine the legitimate effect so that's  
 3 the nature of it.  
 4 Q. And do you have -- is it your understanding  
 5 the jury is still out as to whether there's a  
 6 legitimate effect from the Rational Inquiry Method?  
 7 A. I think there's a legitimate effect.  
 8 Q. But has that been demonstrated by research?  
 9 A. I think it's been demonstrated by the study,  
 10 and the study only examines a limited portion. We  
 11 do -- we are set up to do some brain research, which  
 12 we will do, and that will give much more hard data.  
 13 Q. Is that Mr. Solomon's study?  
 14 A. Mr. Solomon's study is the psychological  
 15 study that I'm referring to, yes.  
 16 Q. And when you say it only does a limited  
 17 portion, what do you mean, his study? A limited  
 18 portion of the modules?  
 19 A. It's giving -- well, it is -- it's a limited  
 20 portion of the modules, limited -- there are, you  
 21 know, many limitations when you do something like  
 22 that. It does not study various aspects of the  
 23 technology.  
 24 Q. Okay. Have you ever been asked to by anyone  
 25 at NXIVM to identify --

1 So I directed people. I said, "Well, you can look  
 2 there. There are a bunch of those," and things like  
 3 that.  
 4 Q. Where else did you tell people to look?  
 5 A. Well, I think any -- any of those fields, any  
 6 of the fields that stem from them. Any of -- we've  
 7 done corporate trainings. Any of the corporations,  
 8 those vertical markets, things like that.  
 9 Q. So corporations -- I'm sorry. Let me make  
 10 sure I understand this. A corporation that you've  
 11 done training for could be a competitor?  
 12 A. No, people who would also train those  
 13 corporations. I'm sorry.  
 14 Q. Okay. When you do a corporate training, do  
 15 you use the ration -- do you give them -- what  
 16 courses do you teach when you do corporate training?  
 17 A. It depends on the corporation.  
 18 Q. Would it be something different than the  
 19 Intensives?  
 20 A. It can be.  
 21 Q. You would not -- have you done any 16-day  
 22 Intensives for corporations?  
 23 A. I'm not sure.  
 24 MR. KOFMAN: Okay. At this point, I  
 25 don't have any more questions. Thank you for your

1 time.  
2 I'm sure my colleagues down the row  
3 have some questions for you. I'm going to slide  
4 down now.  
5 THE WITNESS: Okay. Thank you.  
6  
7 CROSS-EXAMINATION BY MR. LANDY:  
8 Q. Good afternoon, Mr. Ranieri. My name is  
9 Robert Landy. I am a lawyer with the firm of  
10 Friedman Kaplan Seiler & Adelman LLP. We represent  
11 Juval Aviv and Interfor, Incorporated.  
12 I'll be asking you a few questions this  
13 afternoon. I'd ask that you observe the same  
14 general ground rules that Mr. Kofman explained.  
15 Let's try not to speak over each other. You have to  
16 answer with words as opposed to gestures or sounds.  
17 A couple other quick terminology ground rules  
18 just so we understand each other. When I say  
19 "NXIVM," I'll be referring to NXIVM Corporation and  
20 Executive Success Programs collectively. If you  
21 ever have an answer that relates to only one of  
22 those two, tell me.  
23 If I say "the NXIVM defendants," I'm  
24 referring to NXIVM Corporation, Executive Success  
25 Programs, Kristin Keeffe, Nancy Salzman and yourself

1 A. Yes.  
2 Q. Who is Frank Parlato, Jr.?  
3 A. To my knowledge, he was someone that was  
4 hired I think by NXIVM as -- I think he was a  
5 publicist. I think he also assisted in some real  
6 estate dealings.  
7 Q. What do you mean when you say he was a  
8 publicist?  
9 A. He I believe was hired to interface with  
10 like newspapers, reporters, people like that, and to  
11 create positive press.  
12 Q. And is it -- start that one again.  
13 Was he hired to speak to the newspapers and  
14 reporters on NXIVM's behalf?  
15 A. I imagine so. I don't know for certain.  
16 Q. Do you know whether or not Mr. Rob -- strike  
17 that.  
18 Do you know whether or not Mr. Parlato ever  
19 used an alias when speaking to newspaper reporters?  
20 A. I don't -- I don't imagine he would, but he  
21 might because I don't agree with his style.  
22 Q. What about his style do you not agree with?  
23 A. To me, he seemed aggressive.  
24 Q. Do you know if Mr. Parlato is a lawyer?  
25 A. I don't believe he is.

1 collectively. I understand that you have, you know,  
2 certain positions with respect to what your  
3 connection to NXIVM are, but this is just  
4 terminology. I'm talking about all of them. If  
5 your answer requires you to delineate between them,  
6 please do so.  
7 Again, as Mr. Kofman said, if you answer my  
8 question, I'm going to assume that you understand  
9 it. If you don't understand it, let me know, and  
10 I'll try to rephrase it.  
11 Have you ever heard of a man named  
12 Phil Robertson?  
13 A. The name sounds familiar.  
14 Q. Do you know whether or not Mr. Robertson is  
15 an actual person?  
16 A. No. I -- I don't know who he is.  
17 MR. McGUIRE: Did you say Robinson or  
18 Robertson?  
19 MR. LANDY: Robertson.  
20 MR. McGUIRE: Robertson?  
21 MR. LANDY: Robertson.  
22 MR. McGUIRE: Thank you.  
23 BY MR. LANDY:  
24 Q. Have you ever heard of a gentleman by the  
25 name of Frank Parlato, Jr.?

1 Q. Have you ever met him?  
2 A. Yes.  
3 Q. When did you first meet him?  
4 A. I think I met him first at Nancy's house.  
5 Q. "Nancy" is Ms. Salzman, I assume.  
6 A. Yes, Nancy Salzman.  
7 Q. The question was when.  
8 A. The what?  
9 Q. The question was when.  
10 A. Oh, when. Maybe two years ago. Was it two?  
11 Wait, maybe it's -- maybe it's as much as two years  
12 ago.  
13 Q. Do you recall did you speak with him at that  
14 point?  
15 A. Yes.  
16 Q. Do you recall what you spoke about?  
17 A. I think he was telling me about himself and  
18 advertising himself to me.  
19 Q. You said he was hired by NXIVM.  
20 Do you have an understanding of whether he  
21 was an employee of NXIVM?  
22 A. I don't believe so.  
23 Q. Do you think he was something else?  
24 A. Yeah. I think he was an independent  
25 contractor.

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1 Q. Okay. Is he still an independent contractor  
 2 for NXIVM?  
 3 A. I doubt it. I -- that's -- I haven't heard  
 4 anything from him in like a year.  
 5 Q. Have you ever heard of a man named  
 6 Juval Aviv?  
 7 A. Yes.  
 8 Q. Did you ever speak to Mr. Parlato about  
 9 Juval Aviv?  
 10 A. I'm not sure. I imagine I might have, but I  
 11 can't recall any conversation.  
 12 Q. Have you ever heard of a company called  
 13 Interfor, Incorporated?  
 14 A. Yes.  
 15 Q. Have you ever spoken to Mr. Parlato about  
 16 Interfor?  
 17 A. I may have, but I don't recollect any  
 18 conversation.  
 19 Q. Have you ever spoken to Mr. Parlato about  
 20 Rick Ross?  
 21 A. I believe so, yes.  
 22 Q. How many times did you do that?  
 23 A. A handful, not many but more than two.  
 24 Q. What did you discuss?  
 25 A. Frank had very strong opinions about how

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1 NXIVM should respond to media and should be --  
 2 respond to Rick Ross' columns on the web and things  
 3 like that. So in that mix that was mentioned.  
 4 Frank Parlato's expressed opinion towards Rick Ross  
 5 was not very positive.  
 6 Q. What was his expressed opinion towards  
 7 Rick Ross?  
 8 A. I won't repeat the words, per se, but just  
 9 he believed that Rick Ross was the lowest of the  
 10 low.  
 11 Q. Not repeating the words to avoid the use of  
 12 profanity?  
 13 A. In part. In part -- if I use my version of  
 14 profanity, which is probably -- it's certainly not  
 15 Frank's version of profanity, I -- I will either  
 16 overstate it or understate it. I'm not -- I'm not a  
 17 big user of profanity.  
 18 Q. Who is Juval Aviv?  
 19 A. I believe he's a private investigator. I  
 20 believe he is the principal of Interfor, and I  
 21 believe he's someone that worked through NXIVM.  
 22 Q. Worked through -- what do you mean by "worked  
 23 through NXIVM"?  
 24 A. Was an independent contractor for NXIVM, I  
 25 believe it was through their attorney firm, the

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1 Heller firm -- the first name escapes me at the  
 2 moment -- and Joe O'Hara.  
 3 Q. When did you first hear of him?  
 4 A. I heard from Joe O'Hara that this attorney  
 5 from Nolan & Heller is the name -- Nolan is the  
 6 first name -- had two private investigators or  
 7 investigation firms that they worked with. One of  
 8 them was I believe out of Washington, and the other  
 9 was Interfor. They had said that Juval Aviv was in  
 10 the Mossad and that he had gotten back -- I think he  
 11 had gotten back some sort of a kidnapped child or  
 12 something that impressed them quite a bit for one of  
 13 their clients, so Joe wanted to know what I thought.  
 14 Q. Did you tell Joe what you thought?  
 15 A. Uh-huh.  
 16 Q. What did you think?  
 17 A. Hire both firms. I don't know. I think  
 18 that's what ultimately happened, but have both firms  
 19 work on something simple and compare the results and  
 20 see which one you like better. I ultimately don't  
 21 think that's what they did but...  
 22 Q. Have you ever spoken to Juval Aviv?  
 23 A. Yes.  
 24 Q. How many times?  
 25 A. Once.

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1 Q. When was that?  
 2 A. He came to Nancy's house for dinner.  
 3 Q. When was that?  
 4 A. I don't know. It was a few years ago. Nancy  
 5 was in her other house, the Grant Hill address.  
 6 Q. Do you know how long that meeting was after  
 7 you hired -- well, strike that. Let me start again.  
 8 Was that before or after Interfor was hired?  
 9 A. I believe it was after.  
 10 Q. Okay. Do you know how long after?  
 11 A. No, because I don't know -- I don't know what  
 12 you mean by "hired." It was -- Juval was already  
 13 doing work for NXIVM, for Joe O'Hara, for Nolan &  
 14 Heller. I don't mean to get technical with it but  
 15 it is -- I don't know the nature of all those  
 16 interrelationships.  
 17 Q. Do you know what season it was when you met  
 18 with him?  
 19 A. I think it was fall, but I'm honestly not  
 20 sure.  
 21 Q. Mr. Ranieri, I'm going to show you a document  
 22 that's been previously marked as NXIVM Exhibit 14.  
 23 I'd ask you to briefly take a look at it. You'll  
 24 notice that the text is rather small, and it's a  
 25 little bit blurry, but I'll direct you to a couple

1 of fairly short parts that we can discuss.  
 2 A. Okay.  
 3 MR. CAMPION: Is this Ranieri-16?  
 4 MR. LANDY: No, let's just keep it.  
 5 It's already -- you'll see it's got the stamp from  
 6 the last time --  
 7 MR. CAMPION: That's good. Thank you.  
 8 MR. LANDY: So no reason to mark it  
 9 twice.  
 10 MR. CAMPION: Okay.  
 11 BY MR. LANDY:  
 12 Q. Sir, I represent that I'm showing you a copy  
 13 of an article from the Village Voice. It's not the  
 14 entire newspaper, just the pages on which the  
 15 article appears, and my first question is whether  
 16 you've ever seen the article before.  
 17 A. No. I know of its existence.  
 18 Q. Did you ever speak to anyone about this  
 19 article?  
 20 A. Yes.  
 21 Q. Who did you speak to about this article?  
 22 A. I've spoken to a few people about it, but I  
 23 believe Frank told me that -- one of the reasons why  
 24 I didn't read the article was that it was a bunch of  
 25 mud and everyone was dirty.

1 which does not complete on this page, the first  
 2 sentence starts or is, "According to NXIVM spokesman  
 3 Robertson, company leaders were appalled to learn  
 4 what Aviv was up to."  
 5 It's slightly cut off.  
 6 Do you know who "NXIVM spokesman Robertson"  
 7 was?  
 8 A. No.  
 9 Q. All right. I can represent to you -- and I  
 10 can go back and find it in the article if your  
 11 attorneys think it's worth the time -- that  
 12 Robertson is identified as Phil Robertson is his  
 13 full name.  
 14 A. Well, no, I don't -- I don't know who that  
 15 is.  
 16 Q. I'll also represent to you that during her  
 17 deposition Kristin Keeffe testified that Phil  
 18 Robertson was, in fact, Frank Parlato by alias.  
 19 A. That may be so.  
 20 Q. Do you have any reason to believe that's not  
 21 true?  
 22 A. No. I have reasons to believe it is true  
 23 because I would suspect I would know the names of  
 24 the NXIVM spokesperson and I never heard of this  
 25 person so...

1 Q. And by "Frank" you mean Frank Parlato?  
 2 A. Frank Parlato, yes.  
 3 Q. Okay. Were you aware that this article was  
 4 going to be published before it came out?  
 5 A. I don't think so, no.  
 6 Q. Okay. So let's turn to -- I actually want to  
 7 find something. Give me -- bear with me one moment.  
 8 THE VIDEOGRAPHER: Excuse me. We have  
 9 to change tapes.  
 10 MR. LANDY: That worked out.  
 11 THE VIDEOGRAPHER: Going off at 1:49.  
 12 We're back on the record at 1:50.  
 13 MR. LANDY: We'll come back to that.  
 14 Q. Okay. Can you first turn to -- count from  
 15 the back -- you'll get there faster. The fourth  
 16 from the last page, which bears the Bates numbers  
 17 Interfor 0452.  
 18 Just for the record, NXIVM -- NXIVM 14 bears  
 19 the Bates number Interfor 0442 through Interfor  
 20 0455.  
 21 A. "Fitness Health" and "Beauty" at the top of  
 22 the page?  
 23 Q. Yes, that's in the advertisement section.  
 24 A. Yes.  
 25 Q. Okay. You'll see in the very last paragraph,

1 Q. Do you know what's meant by, "Company leaders  
 2 were appalled to learn what Aviv was up to"?  
 3 A. I can hazard a guess. I --  
 4 MR. CAMPION: Do you want him to?  
 5 MR. LANDY: Yeah.  
 6 MR. CAMPION: Go ahead.  
 7 THE WITNESS: Excuse me. I'm sorry.  
 8 Continuing...  
 9 A. I had heard that -- and I did not hear this  
 10 from Aviv himself -- that Aviv believed that the  
 11 Legionnaires of Christ in Mexico had paid something  
 12 like \$5 million to Senator -- ex-Senator D'Amato to  
 13 go and go against us in the courts and various other  
 14 things and that he had a neighbor and that that  
 15 neighbor could talk to D'Amato and stop him from  
 16 doing damage to us.  
 17 He also supposedly was involved in a  
 18 government program with astro projection where they  
 19 sort of sit around and meditate or whatever and go  
 20 and spy on people and that that's how he derived  
 21 some of his information.  
 22 Q. I will direct your attention to the following  
 23 page, which is Interfor 053 (sic), the first full  
 24 non-advertising paragraph on that page.  
 25 MR. LEONARD: What page?

1 MR. LANDY: 0453.  
 2 Q. It's one page, one more page. It's Page 34  
 3 of the -- of the magazine?  
 4 A. I can't read it, but if you read it.  
 5 Q. The first full paragraph goes as such,  
 6 "Robertson says that NXIVM was barely in contact  
 7 with Aviv, whom O'Hara hired on its behalf for  
 8 entirely legal investigations. "We knew nothing  
 9 about a sting," he said. "We had no participation  
 10 in any sting. We found out about it afterwards.  
 11 What we saw was, a corrupt attorney hires a corrupt  
 12 private investigator..." There's ellipses. "We  
 13 certainly didn't -- and would not -- authorize  
 14 illegal activities. That was his doing, and I  
 15 understand that's his nature. He's pretty much a  
 16 loose cannon."  
 17 Do you know what Robertson is talking about  
 18 in that paragraph?  
 19 A. Well, what you just --  
 20 MR. McGUIRE: Object to the form.  
 21 Q. I'll rephrase it.  
 22 Do you know what the person who is identified  
 23 as Robertson is discussing in that paragraph?  
 24 A. To some degree, the paragraph that you read  
 25 me seemed to be -- have some truth in it. I don't

1 barely in contact with Aviv."  
 2 I don't know if that's true or false. I  
 3 believe that Kristin was friends to some degree  
 4 with your client, with --  
 5 Q. By that you mean Juval Aviv?  
 6 A. Juval Aviv, yes. I don't know how much they  
 7 had contact.  
 8 -- whom O'Hara hired on behalf for an  
 9 entirely legal investigation.  
 10 Yes, I've seen a paper that said that Aviv  
 11 would not do anything illegal.  
 12 "We knew nothing here about a sting."  
 13 I don't believe that's true.  
 14 Joe O'Hara from the very beginning spoke of  
 15 things like that. I don't know what you'd call a  
 16 sting or not, but what I did know was that it was  
 17 alleged by people that have spoken to Ross that  
 18 Ross was saying things that were outrageous about  
 19 NXIVM, about myself and that Joe thought it would be  
 20 good to catch him doing that with someone so that it  
 21 could be documented.  
 22 He stated, "We had no participation in any  
 23 sting."  
 24 I don't know if that's true or false.  
 25 If you -- if you say Kristin knowing about

1 know is that a -- is that a quote from him? I can't  
 2 see the quotes.  
 3 Q. I read the quotes into the record.  
 4 A. Okay. That's --  
 5 Q. Some of it is a quote --  
 6 A. Okay.  
 7 Q. And some of it is the author.  
 8 A. Okay.  
 9 Q. What parts have true to it -- truth to them?  
 10 A. I'm going to try to read it with my  
 11 binoculars.  
 12 Q. Go ahead.  
 13 A. Starting with, "Robertson says" --  
 14 Q. Yeah.  
 15 A. -- "that NXIVM." Okay.  
 16 Q. My next series of questions will relate to  
 17 the following paragraph, so you might as well read  
 18 two paragraphs.  
 19 A. In other words, that and the paragraph that  
 20 says when?  
 21 Q. Yeah, it starts "when" and then jumps over  
 22 the picture.  
 23 A. Okay. Can I take it sentence by sentence?  
 24 Q. Uh-huh.  
 25 A. It says, "Robertson says that NXIVM was

1 the sting or my hearing about the sting is  
 2 participation, then we did, because I did know about  
 3 it. I don't know if I knew about it after or  
 4 before. From what I've read, it sounds like Kristin  
 5 knew before and was more intimately involved so...  
 6 "We found out about it afterward. What we  
 7 saw was, a corrupt attorney," I believe true, "hires  
 8 a corrupt private investigator."  
 9 I don't know. From what I read in the  
 10 contract, if Juval has done nothing illegal, then  
 11 that contract is valid. If he's done something  
 12 illegal, the contract's invalid. I don't know if  
 13 he's corrupt or not.  
 14 "We certainly didn't -- and would not --  
 15 authorize illegal activities."  
 16 That's true.  
 17 "That was his doing, and I understand that's  
 18 his nature."  
 19 That's his opinion.  
 20 "He's pretty much a loose cannon."  
 21 That's his opinion. If this is Frank Parlato  
 22 speaking for NXIVM, that's what my opinion is on  
 23 what I've read so far.  
 24 Want me to continue?  
 25 Q. Why don't you -- let me just pause for a

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1 moment.  
 2 You just testified if that's Frank Parlato  
 3 speaking --  
 4 MR. LANDY: Reread the last half of the  
 5 answer, please, so I can get the quote proper.  
 6 "If this is Frank Parlato speaking" is  
 7 where you need to start unless you all want to hear  
 8 the whole answer.  
 9 (The following was read back by the  
 10 reporter:  
 11 "If this is Frank Parlato speaking for  
 12 NXIVM, that's what my opinion is on what I've read  
 13 so far.  
 14 Want me to continue?")  
 15 Q. Can you just explain that answer? What's  
 16 your opinion? Are you saying that whatever --  
 17 A. Each sentence that I read --  
 18 Q. Yeah.  
 19 A. Right. I don't know if this is Frank  
 20 Parlato, although I have reason to believe it is,  
 21 considering, and I took each sentence and responded  
 22 to it from my perspective.  
 23 Q. Okay. So what you're not saying is that if  
 24 this is on behalf of NXIVM, then it is also your  
 25 opinion?

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1 A. Correct.  
 2 Q. Okay. That's -- that's all I wanted to  
 3 clarify.  
 4 MR. SKOLNIK: I'm sorry. Could I hear  
 5 the last question?  
 6 (The following was read back by the  
 7 reporter:  
 8 "Okay. So what you're not saying is  
 9 that if this is on behalf of NXIVM, then it is also  
 10 your opinion?  
 11 ANSWER: Correct.")  
 12 BY MR. LANDY:  
 13 Q. So let's move on to the next paragraph then,  
 14 or let me stop you for a second and let's just go  
 15 over a couple of quick things that you said.  
 16 You said you've seen a paper where it was  
 17 written that Interfor would not do anything illegal,  
 18 is that correct?  
 19 A. Yes. I saw contract terms supposedly between  
 20 Interfor and NXIVM.  
 21 Q. Where did you see that?  
 22 A. At Nancy's house.  
 23 Q. All right. Let's move on to the next -- also  
 24 -- yeah, let's move on.  
 25 So can we go through the next paragraph in

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1 the same manner?  
 2 A. Yes.  
 3 "When asked if he regretted hiring Aviv" --  
 4 am I reading that right that --  
 5 Q. Yeah, you want me to read it out --  
 6 A. -- "Robertson replied, 'How can you not  
 7 regret hiring the guy who would pad his own hours,  
 8 he'd fabricate, he'd create stories that he couldn't  
 9 document, and behind your back he creates fantastic  
 10 programs like, uh, we later found out he was going  
 11 to do some kind of insane sting kind of deal."  
 12 To comment on that, what I told you might  
 13 fit into this with if the astro projection thing is  
 14 true, that that could clearly be a fabrication and  
 15 something that's very difficult to verify. As far  
 16 as I know, such things have never been verified in  
 17 science.  
 18 -- "insane sting kind of deal."  
 19 I may not know the full description of what  
 20 an insane sting type of deal is. What I understood  
 21 did not sound particularly insane.  
 22 From what I understood, Juval represented he  
 23 had a previous relationship with Ross. Juval said  
 24 that he did not want to work with Ross because Ross  
 25 asked him to fabricate evidence -- I don't know if

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1 that's true or not -- and that supposedly Juval said  
 2 he understood Ross' motives, so I don't know what  
 3 they concocted.  
 4 He says, "We're certainly not responsible,  
 5 nor do we condone this type of activity."  
 6 I don't know what "this type of activity" is.  
 7 "Aviv did it, there seems to be no doubt.  
 8 How he did, I don't know." I don't know what it  
 9 is, what the sting thing is in completion.  
 10 "I heard that he was rummaging through  
 11 garbage."  
 12 I -- I've heard that, too. I don't know if  
 13 it -- I don't think it was Aviv that was rummaging  
 14 through garbage from what I imagine.  
 15 Q. You earlier testified that Mr. O'Hara --  
 16 A. Am I going to need to re --  
 17 Q. Keep it out. I don't think so but --  
 18 A. Okay, I'll just.  
 19 Q. If you could switch glasses.  
 20 A. Yeah.  
 21 Q. You previously testified that Mr. O'Hara had  
 22 suggested catching Ross in the act.  
 23 A. Uh-huh.  
 24 Q. Can you expand on that? What did -- what did  
 25 Mr. O'Hara suggest?

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1 A. O'Hara and I and I think O'Hara and NXIVM  
 2 have a fundamental disagreement in philosophy, which  
 3 was always a problem. O'Hara when we first met  
 4 O'Hara suggested doing things that were let's just  
 5 say ina -- what you might call inappropriate. He  
 6 was not specific, but when I spoke to him and I  
 7 responded to what he said, he said, "Well, okay.  
 8 You don't believe in that sort of a thing."  
 9 He -- he believes he has stated to me that if  
 10 someone breaks the rules, then you can do anything.  
 11 I have stated back to him, "Who is to judge that?"  
 12 First of all, so that leaves you with a problem. I  
 13 -- I thought I heard -- so I'm sorry.  
 14 MR. CAMPION: If you finished the  
 15 answer, you finished the answer. If you have more  
 16 to say, say it.  
 17 Q. I'm just -- you were pausing.  
 18 A. Yeah, okay.  
 19 Q. I don't know that that quite --  
 20 MR. LANDY: Can you read my question  
 21 back, please.  
 22 (The following was read back by the  
 23 reporter:  
 24 "Can you expand on that? What did --  
 25 what did

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1 Mr. O'Hara suggest?")  
 2 Q. Right, and then I believe you discussed your  
 3 difference of opinion but --  
 4 A. Inappropriate.  
 5 Q. -- did he suggest anything specific?  
 6 A. Well, he always suggested trying to observe  
 7 or document Ross' wrongdoings, which I think is  
 8 appropriate.  
 9 Q. Did he suggest how you should do that?  
 10 A. He suggested many ways. With respect to this  
 11 issue, I think he wanted to get Ross documented  
 12 saying the slanderous things that were alleged that  
 13 Ross was saying.  
 14 Q. Did he say how he would get -- he wanted to  
 15 get that documented?  
 16 A. No.  
 17 Q. When did you have this conversation?  
 18 A. Years ago. I had ongoing conversations with  
 19 Joe O'Hara.  
 20 Q. You can put the article aside.  
 21 Let me ask you a couple more questions. You  
 22 won't have to actually refer to it, though.  
 23 Did you ever discuss this article with  
 24 Ms. Salzman?  
 25 A. Discuss this article?

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1 Q. Yes.  
 2 A. No. I didn't really know about it. I knew  
 3 it existed. I never read it.  
 4 Q. Did you ever discuss it with Ms. Keeffe?  
 5 A. No. I knew it existed. I've never read it.  
 6 Q. Do you know who Chris Thompson is?  
 7 A. No.  
 8 Q. At any point, did you become aware that  
 9 Interfor was beginning an investigation of  
 10 Rick Ross?  
 11 A. I wasn't aware that they were beginning. I  
 12 was aware that they had already investigated.  
 13 Q. When did you become aware of that?  
 14 A. When I met Juval at Nancy's house.  
 15 Q. Had you learned about any of the results of  
 16 Interfor's investigations prior to your meeting with  
 17 Mr. Aviv?  
 18 A. No. No. I was contemplating. I had heard  
 19 from Kristin Keeffe at one point that Juval had a  
 20 bunch of information that she thought he had gotten  
 21 off the internet, and I'm quite sure that was after  
 22 but I'm not positive.  
 23 Q. After your meeting?  
 24 A. Or right in the proximity. It was close in  
 25 proximity.

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1 Q. Do you know if anyone at NXIVM asked Interfor  
 2 to investigate Rick Ross?  
 3 A. No.  
 4 Q. Did you ever discuss Interfor's investigation  
 5 of Rick Ross with anyone at NXIVM?  
 6 A. Superficially, yes, with Kristin, as I  
 7 mentioned. I've seen some of the documents in this  
 8 case which discuss it; not in detail, though.  
 9 Q. We discussed earlier or you testified earlier  
 10 that you had had some conversations with Mr. O'Hara  
 11 and someone from the Nolan & Heller firm about  
 12 hiring a private investigator.  
 13 Did you discuss hiring a private investigator  
 14 with anybody else?  
 15 A. I don't know if I had discussions about  
 16 hiring the private investigator with Nolan & Heller.  
 17 I gave my advice on how to select potentially a  
 18 private investigator. On and off there have been  
 19 discussions of hiring private investigators.  
 20 Q. And let me rephrase the -- I should have  
 21 restricted that question to the year of 2004.  
 22 A. Okay. I don't remember what discussions  
 23 happened in that year.  
 24 Q. In the time frame of 2004 and 2005, were you  
 25 made aware of an operation whereby Interfor would

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1 approach Mr. Ross and speak to him on behalf of a  
 2 fictitious client?  
 3 A. I became aware that that had happened. I  
 4 don't know when.  
 5 Q. When did -- under what circumstances did you  
 6 become aware that that had happened?  
 7 A. I think it was Joe. Joe mentioned I believe  
 8 that Juval had Rick Ross on tape saying he had  
 9 compromising pictures of me and things like in the  
 10 shower, something like that, and having sex with  
 11 many students and such things.  
 12 Q. Have you ever heard the tape?  
 13 A. No.  
 14 Q. Did Mr. O'Hara make any comment as to whether  
 15 he was pleased with the results of that -- the  
 16 meeting between Mr. Ross and Mr. Aviv?  
 17 A. No.  
 18 Q. Did you discuss at that point discontinuing  
 19 NXIVM's relationship with Interfor?  
 20 A. After my meeting with Juval that night at  
 21 Nancy's, it was my position that Juval did not --  
 22 did not function in a way that would be helpful to  
 23 us.  
 24 Q. What do you mean by that?  
 25 A. I -- I did not find Juval to be credible to

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1 me. He was talking a lot about himself. He was  
 2 talking a lot about his past; and when someone  
 3 advertises that much to me, I find them less  
 4 credible. So it was my position -- it sounded like  
 5 an awful lot of effort for things like, you know,  
 6 this -- the thing that I had heard, the astro  
 7 projection sort of stuff or whatever. And when  
 8 Juval spoke, it didn't sound very definite. It was  
 9 all very nebulous.  
 10 Q. Who did you discuss this with?  
 11 A. Which thing?  
 12 Q. What you just testified to, your opinion.  
 13 A. There were times when Joe -- I would mention  
 14 it to Joe. I'm sure I've mentioned it to Nancy, and  
 15 I certainly mentioned it to Kristin.  
 16 Q. Okay. Let me start with Joe. I presume  
 17 we're discussing Mr. O'Hara.  
 18 MR. SKOLNIK: Bob, I'm having trouble  
 19 hearing your questions.  
 20 MR. LANDY: Sorry.  
 21 A. Joe, I'm sorry.  
 22 Q. Yeah. We're discussing Mr. O'Hara. Did he  
 23 have any reaction to your position?  
 24 A. Joe was very friendly to me so he always took  
 25 my positions and seemed to agree, seemed to be

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1 pretty positive or whatever, but often with Joe  
 2 things did not get done so I was always wondering  
 3 if he was just humoring me because I'm either a  
 4 friend or someone who's seen as important to some  
 5 degree or whatever so...  
 6 Q. Did Ms. Salzman have any reaction when you  
 7 discussed this with her?  
 8 A. I think, yeah, Nancy takes what I say pretty  
 9 seriously; and I suspect she went and investigated  
 10 what was going on. I don't know for sure.  
 11 Q. Did she say anything to you?  
 12 A. Not directly, but the sort of things I would  
 13 advise in a certain circumstance like this are,  
 14 "What are you paying for? What are you getting as  
 15 a take-away product? What are you getting as an end  
 16 product? If you're putting money in, is it really  
 17 worth that money, what you're getting out the other  
 18 side? Are you getting just talk, or are you getting  
 19 specific results? Is it appropriate? Do you  
 20 believe in the person?" Those sort of things.  
 21 My impression from my memory of talking with  
 22 Nancy is that Nancy felt that Juval was not giving  
 23 results, and I don't know if that's with respect to  
 24 Ross because at the time the main concern was if  
 25 there really was some sort of money funded

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1 politically behind outside of us so that there would  
 2 be negative press, there would be negative politics,  
 3 things like that.  
 4 Q. How did Ms. Keeffe react to what you told  
 5 her?  
 6 A. She's more combative and -- which is fine. I  
 7 think it's her -- her personality. I think also she  
 8 was friends with Juval Aviv and upheld him often as  
 9 being valuable or that he really does seem credible,  
 10 and she thinks he's genuine and things like that.  
 11 Q. Do you know if there came a time when NXIVM  
 12 ended its relationship with Interfor?  
 13 A. I assume so.  
 14 Q. You don't know one way or the other?  
 15 A. No, and I don't know when if that happened.  
 16 Q. My next question was going to be why, not  
 17 when.  
 18 A. Oh.  
 19 Q. Do you know why?  
 20 A. No.  
 21 Q. I'm going to show you a document that was  
 22 also previously marked. This was marked as NXIVM  
 23 Exhibit 9. It bears the -- it bears two sets of  
 24 Bates numbers. It bears the Bates numbers SP0554  
 25 through 555 as well as JJO-000699 through 700.

1 I'd ask you to review that document.  
 2 A. (Witness complies.)  
 3 MR. SKOLNIK: What's the number on this?  
 4 MR. LANDY: This is previously marked  
 5 NXIVM-9. It's got the sticker on it.  
 6 BY MR. LANDY:  
 7 Q. And when you're done going through this,  
 8 Mr. Raniere, my first question is going to be  
 9 whether or not you recognize the document.  
 10 A. I don't believe this document to be true.  
 11 Q. We can get to that, but the first question is  
 12 whether you recognize it.  
 13 A. No. I recognize from it looking through the  
 14 documents in this case.  
 15 Q. Do you recall ever receiving this document?  
 16 A. No. This document says "Hand Delivered" on  
 17 the top.  
 18 If you understood my lifestyle, as certainly  
 19 Joe did, the only way he could hand deliver it would  
 20 be to hand me this document. I have never seen this  
 21 document.  
 22 Q. I direct your attention to -- one, two -- the  
 23 third full paragraph on the first page. There's a  
 24 -- the second sentence is in -- is underlined and in  
 25 parentheses and reads, "(Note: This specifically

1 Interfor's investigations in the future discussed?  
 2 A. Not specifically. Juval Aviv spoke of many  
 3 things that he could do for NXIVM in a very broad  
 4 sense. It was more of a social dinner.  
 5 Q. Did you discuss Mr. Ross' -- strike that.  
 6 Did you discuss Mr. Aviv's meeting with  
 7 Mr. Ross during what you said was that dinner?  
 8 A. No. I don't know even if the meeting had  
 9 occurred or not. He did mention I believe in that  
 10 meeting also that he had a preexisting relationship  
 11 with Ross.  
 12 "I know him." I think he said something  
 13 along those lines.  
 14 Q. Is this the meeting at which you learned  
 15 about the claim that Mr. Ross had I think you  
 16 described photographs of you?  
 17 A. No.  
 18 Q. When did you hear about that?  
 19 A. I think it was sometime after.  
 20 Q. Who did you hear it from?  
 21 A. I believe I heard it from Kristin Keeffe.  
 22 Q. Did you ever hear of a plan whereby Interfor  
 23 would arrange that Mr. Ross meet Ms. Keeffe at  
 24 either a resort or on a cruise with Ms. Keeffe using  
 25 an assumed name?

1 includes, but is not limited to, the 'Sting  
 2 Operation' that Keith has proposed Interfor  
 3 undertake with" -- sorry -- "that Keith has proposed  
 4 having Interfor undertake with respect to Mr.  
 5 Ross)."  
 6 Q. Did you propose having Interfor undertake  
 7 any actions with respect to Mr. Ross?  
 8 A. No.  
 9 Q. Turn to the next page.  
 10 A. (Witness complies.)  
 11 Q. Who is Matthew Jones?  
 12 A. He's an attorney in Saratoga that is a friend  
 13 of Joe -- Joe O'Hara and a close friend of his  
 14 partner, Doug Rutnik.  
 15 Q. Does Mr. Jones -- has Mr. Jones ever  
 16 represented NXIVM?  
 17 A. I believe so, yes.  
 18 Q. Has he ever represented you?  
 19 A. I don't know if it -- I don't believe so.  
 20 Q. Was Mr. O'Hara ever your attorney?  
 21 A. I believe so, yes.  
 22 Q. I'd like to return to your meeting with  
 23 Mr. Aviv.  
 24 At that meeting or that meeting at  
 25 Ms. Salzman's house was -- were any plans for

1 A. I've seen it in this paperwork, and I believe  
 2 I heard it before I saw it in the paperwork here.  
 3 Q. Who did you hear it from?  
 4 A. I believe I heard it from Kristin.  
 5 Q. Do you know when you dis -- when you heard it  
 6 from Kristin?  
 7 A. And what I heard from Kristin was not  
 8 necessarily that she was to meet or whatever. I  
 9 heard it in the context that -- I don't remember --  
 10 whoever it was claimed that there was something to  
 11 do with a cruise ship or she found the cruise ship  
 12 thing apparently ridiculous -- I don't know -- and  
 13 if I remember correctly, she found it to be an  
 14 exaggeration.  
 15 Q. An exaggeration of what?  
 16 A. It sounds like there was some planned thing  
 17 where they were going to get information that Ross  
 18 was telling people, and I don't know if it was from  
 19 -- with Kristin, per se, but I do believe I did hear  
 20 this from Kristin.  
 21 Q. Do you know when you heard it from Kristin?  
 22 A. No, not specifically.  
 23 Q. Do you know whether Kristin was supposed to  
 24 be involved in this plan?  
 25 A. When you say "involved" --

1 Q. A participant.  
 2 A. Oh, that I don't know so...  
 3 Q. Then the second question is whether she was  
 4 involved in the planning of what we can refer to as  
 5 a sting.  
 6 A. That I don't know. She might have been.  
 7 Q. Did you ever -- I'm going to refer to that  
 8 meeting -- to this plan of meeting Rick Ross on a  
 9 cruise ship that's somewhat undefined as "the sting"  
 10 just for ease of --  
 11 A. Can you exclude the cruise ship? Just say  
 12 some meeting with Rick --  
 13 Q. Some meeting with Rick Ross somewhere --  
 14 A. Right.  
 15 Q. -- with -- well, I have to -- give me a  
 16 second to rephrase that.  
 17 Are you aware that Mr. Ross, in fact, met  
 18 with Mr. Aviv and one -- and an employee of Interfor  
 19 at some point?  
 20 A. Yes.  
 21 Q. Okay. Are you aware that there was a planned  
 22 second stage of this operation whereby Mr. Ross was  
 23 supposed to meet with someone else who would be an  
 24 employee or a member or a student of NXIVM?  
 25 A. I'm aware of that now.

1 objection to you to the actions of --  
 2 A. No, not that I remember.  
 3 Q. Hold on. You got to let me finish the  
 4 question and then --  
 5 A. I haven't heard an objection to that, so I  
 6 was going to answer.  
 7 Q. I know that. I'm just -- for the transcript,  
 8 I got to finish the question and then you give me  
 9 the answer or else you got these dashes and then it  
 10 becomes completely muddled.  
 11 The question is did Ms. Keeffe ever express  
 12 to you any objection concerning Interfor's meeting  
 13 with Rick Ross?  
 14 A. No, not that I'm aware.  
 15 Q. When was the first time you saw NXIVM Exhibit  
 16 9?  
 17 A. I think when I looked through the papers  
 18 given me for this deposition.  
 19 Q. Now, correct me if I'm mischaracterizing your  
 20 earlier testimony, but is it your understanding that  
 21 Joseph O'Hara and Nolan & Heller were -- believed  
 22 that they had obtained the information that they  
 23 were seeking after Mr. Ross' first meeting with  
 24 Juval Aviv? Because you said "they."  
 25 A. Yeah. I don't know if it was after the first

1 Q. When did you become aware of that?  
 2 A. Reading the paperwork. It was my impression  
 3 that whatever information they wanted they had  
 4 gotten in this tape.  
 5 Q. When you say "they," who are you referring  
 6 to?  
 7 A. Joe O'Hara, Interfor and that group, Nolan &  
 8 Heller. I don't know how they're involved in there.  
 9 Q. Did anyone at NXIVM ever express to you an  
 10 objection to the fact that Ross had or that Mr. Aviv  
 11 had met with Mr. Ross?  
 12 A. 'Cause I've read the things in this case, I  
 13 mean --  
 14 Q. Well, the question is did anyone ever express  
 15 to you an objection?  
 16 A. An objection. Not that I recall.  
 17 Q. Did Ms. Salzman ever discuss -- ever mention  
 18 any objection to the actions that Mr. Aviv had taken  
 19 in meeting Mr. Ross when you had a discussion with  
 20 her about the continuing use of Interfor's  
 21 services --  
 22 A. No.  
 23 Q. -- that we discussed about earlier?  
 24 A. No, not that I remember.  
 25 Q. Okay. Did Ms. Keeffe ever express an

1 meeting, and I don't know exactly the whys and  
 2 wherefores, but what it sounded like was that  
 3 whatever this tape was damning and that that  
 4 was good.  
 5 Q. Did you ever -- do you know if Ms. Keeffe  
 6 held the same opinion?  
 7 A. No, I don't know.  
 8 Q. Did anyone actually tell you that the tape  
 9 was damning and that that was good? Not in those  
 10 specific words.  
 11 A. Yeah. I imagine Kristin saying some of the  
 12 details that I mentioned to you and in a very  
 13 emphatic sense said, "this, this, this." I think  
 14 it's my -- my opinion that it was, if you will,  
 15 complete, good, whatever, that that was captured.  
 16 MR. LANDY: Could I just have the last  
 17 answer read back.  
 18 (The following was read back by the  
 19 reporter:  
 20 "Yeah. I imagine Kristin saying some of  
 21 the details that I mentioned to you and in a very  
 22 emphatic sense said, 'this, this, this.' I think  
 23 it's my -- my opinion that it was, if you will,  
 24 complete, good, whatever, that that was captured.")  
 25

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1 BY MR. LANDY:  
 2 Q. What do you mean by in your opinion?  
 3 A. In other words, Kristin would say, you know,  
 4 "Oh, this, this and this." And, you know, I had  
 5 heard for a long time -- we have different people  
 6 who have heard this from Ross and that from Ross,  
 7 and it's a lot of hearsay.  
 8 If it is indeed something that's legitimately  
 9 documented, that's better. That's more reliable  
 10 data. You know, no matter how much I might think  
 11 Ross is an opponent, there's opinion and there's  
 12 data, and there's a lot of hearsay.  
 13 MR. McGUIRE: Mr. Landy, if such a tape  
 14 exists, would you produce it, please?  
 15 MR. LANDY: It was produced --  
 16 MR. McGUIRE: It was?  
 17 MR. LANDY: -- bearing Bates numbers  
 18 Interfor 00001. I have a segment with me today as  
 19 well as an unofficial transcript of it --  
 20 MR. McGUIRE: All right. Thank you.  
 21 MR. LANDY: But we'll get to that.  
 22 I might have messed up the number of  
 23 zeroes, but I think it was four of them.  
 24 I'm sorry. Now I have to hear the last  
 25 answer once more.

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1 (The following was read back by the  
 2 reporter:  
 3 "In other words, Kristin would say, you  
 4 know, 'Oh, this, this and this.' And, you know, I  
 5 had heard for a long time -- we have different  
 6 people who have heard this from Ross and that from  
 7 Ross, and it's a lot of hearsay. If it is indeed  
 8 something that's legitimately documented, that's  
 9 better. That's more reliable data. You know, no  
 10 matter how much I might think Ross is an opponent,  
 11 there's opinion and there's data, and there's a lot  
 12 of hearsay.")  
 13 BY MR. LANDY:  
 14 Q. Were you pleased with what Ms. Keeffe told  
 15 you that Interfor was able to capture?  
 16 A. I haven't seen the transcript of the tape, so  
 17 I don't know. I mean, what she was saying sounded  
 18 pretty wild.  
 19 Q. Do you have an understanding of where  
 20 Mr. Ross purportedly received the material that he  
 21 purported -- start that again.  
 22 Do you know whether or not Mr. Ross, in fact,  
 23 had the materials he claimed to have?  
 24 A. Mr. Ross had what materials?  
 25 Q. That we've been discussing, the mis --

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1 A. The trade secret materials?  
 2 Q. No, no, no. Sorry. Taking a broader sense to  
 3 shorten the conversation, that actually had the  
 4 materials that Ms. Keeffe had described to you?  
 5 A. Like the pictures and all that?  
 6 Q. Yes.  
 7 A. No, I have no knowledge of that.  
 8 Q. So you would have no knowledge of where he  
 9 got it?  
 10 A. Correct.  
 11 Q. Did any of the --  
 12 A. I don't believe they exist.  
 13 Q. My next question was did any of the things  
 14 that Ms. Keeffe described to you seem to be things  
 15 you knew actually existed?  
 16 MR. McGUIRE: Let me have that read  
 17 back, please.  
 18 (The following was read back by the  
 19 reporter:  
 20 "My next question was did any of the  
 21 things that Ms. Keeffe described to you seem to be  
 22 things you knew actually existed?")  
 23 A. No.  
 24 MR. LANDY: All right. Now, I actually  
 25 have to mark something.

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1 What are we up to?  
 2 THE REPORTER: Raniere-16.  
 3 MR. LANDY: Okay. I'd ask the court  
 4 reporter to mark as Raniere-16 a document entitled  
 5 Keith Raniere's Responses to Defendant Rick Ross'  
 6 First Amended Set of Interrogatories to NXIVM  
 7 Corporation; another mouthful.  
 8 (Keith Raniere's Responses to Defendant  
 9 Rick Ross' First Amended Set of Interrogatories  
 10 to NXIVM Corporation was received and marked  
 11 Defendant's Exhibit Raniere-16 for Identification.)  
 12 (A discussion was held off the record.)  
 13 BY MR. LANDY:  
 14 Q. Do you recognize this document, sir?  
 15 A. Yes, I believe I do.  
 16 Q. On the second-to-last page, which is Page  
 17 Number 13, is that your signature?  
 18 A. Yes. I am curious -- okay. I misread  
 19 something where it said March 1, 2007, in the front.  
 20 Yeah, I have one set of things that I signed  
 21 February 1st but not March.  
 22 Q. All right. If you turn to Page 6, I'm going  
 23 to direct you to the third paragraph of the response  
 24 to Interrogatory Number 1.  
 25 A. 6?

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1 Q. Page 6.  
2 A. Mr. Ran -- it starts, "Mr. Raniere does  
3 recall some"?  
4 Q. It starts, "Mr. Raniere does recall."  
5 A. Uh-huh.  
6 Q. I'll just read it for the record.  
7 "Mr. Raniere does recall some communications  
8 with Kristin Keeffe where the subject matter  
9 generally involved a revelation that came to light  
10 because of Interfor's work that Rick Ross claimed to  
11 falsely possess material of a very personal nature  
12 Mr. Raniere deemed inappropriate and in violation of  
13 his right to privacy with which, he was informed, it  
14 was Rick Ross' stated intention to coerce NXIVM."  
15 Are those materials of a very personal nature  
16 what we've just been discussing?  
17 A. Uh-huh.  
18 Q. Say "yes" or "no."  
19 A. Yes.  
20 Q. Okay, but you believe the -- isn't it --  
21 start it again.  
22 Is it true that you believe the materials  
23 that Mr. Ross claimed to have don't really exist?  
24 A. Correct.  
25 Q. Okay. Can you explain how it is a -- what

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1 did you mean by it was a violation of -- I'm  
2 paraphrasing -- your right to privacy?  
3 A. Uh-huh. If such materials do exist, it's  
4 either there is a type of exaggerated hearsay going  
5 on or there is slander or there is an invasion of  
6 privacy. So it's my position -- and I have never  
7 seen these things -- if these things exist, they are  
8 a violation of my privacy. It's hard to imagine  
9 they do.  
10 Q. Is it your position that they violate your --  
11 strike that question.  
12 I'd like to direct your attention to your  
13 response to Interrogatory Number 8, which is the  
14 paragraph that begins on Page 9 and continues on to  
15 Page 10.  
16 A. Uh-huh.  
17 Q. It starts with, "Without waiving these  
18 objections" --  
19 A. Uh-huh.  
20 Q. -- but most of the paragraphs start that way.  
21 A. Uh-huh.  
22 Q. Just read that to yourself and then I'll ask  
23 you a quick question or two.  
24 A. The first line of the paragraph or  
25 continuing?

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1 Q. The whole --  
2 A. The full paragraph?  
3 Q. Read the full paragraph.  
4 A. (Witness complies.)  
5 Yes.  
6 Q. All right. Do you see on the -- on Page 10  
7 where it says, "The details of the alleged 'plan'  
8 were attended to by others, and Mr. Raniere only  
9 learned of them subsequent to Interfor's attempted  
10 implementation."  
11 A. Yes.  
12 Q. Who were the others you were referring to?  
13 A. Joe O'Hara, I guess Nolan & Heller if they  
14 were involved, possibly Kristin. I mean, I believe  
15 she knew.  
16 Q. I turn your attention to Page 11, which is  
17 the response to Interrogatory Number 10.  
18 Again, the paragraph starts with, "Without  
19 waiving the foregoing objection," but if you would  
20 read that paragraph to yourself, and then I'll have  
21 a quick one or two questions about it as well.  
22 A. (Witness complies.)  
23 MR. McGUIRE: Interrogatory 11?  
24 MR. LANDY: No. Response to 10, Page  
25 11.

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1 MR. McGUIRE: I'm sorry.  
2 (A discussion was held off the record.)  
3 A. Uh-huh.  
4 Q. On Page 11, one, two three, four -- five  
5 lines down in the sentence that starts with the --  
6 the last word of that sentence --  
7 A. At?  
8 Q. -- reads: "At some point during the course  
9 of this litigation Mr. Raniere became aware of a  
10 written communication from Interfor entitled 'Status  
11 Report' that was a report on the status of an  
12 investigation into Rick Ross."  
13 When during this litigation did you become  
14 aware of the Status Report?  
15 A. I'm not exactly sure, but I'm trying to  
16 remember if it was before or after the  
17 counterclaims. I think it was before the  
18 counterclaims were filed.  
19 Q. By Mr. Ross? The counterclaims by Mr. Ross?  
20 A. Yes.  
21 Q. Okay. Did you see it?  
22 A. I'm not positive. No.  
23 Q. Who did you hear about it from?  
24 A. I believe I heard about it from Kristin.  
25 Q. All right. You can put Raniere-16 aside.

1 Who is Toni Natalie?  
 2 A. Toni Natalie is a -- an ex-business associate  
 3 of mine, someone who was involved with Consumers'  
 4 Buyline, someone that I was very involved with  
 5 personally.  
 6 Q. By "personally," do you mean romantically?  
 7 MR. CAMPION: None of that.  
 8 Are you going to press that point.  
 9 MR. LANDY: Let me take a look and see  
 10 if I can get around it.  
 11 Let's go off the record for one second.  
 12 Can we chat for a second?  
 13 MR. CAMPION: Sure.  
 14 THE VIDEOGRAPHER: Going off the record  
 15 at 2:45.  
 16 (At this point, there was a short  
 17 recess.)  
 18 THE VIDEOGRAPHER: This is the beginning  
 19 of Tape Number 5. The time is 3:08.  
 20 BY MR. LANDY:  
 21 Q. At this point, Mr. Raniere, I'd like to mark  
 22 an excerpt from an audio recording. I'll represent  
 23 to you that this audio recording was produced in  
 24 discovery in this action. It bears the Bates  
 25 Numbers Interfor 00001, and what I'm going to --

1 over the entire excerpt. What we'll do is I'll  
 2 read a portion, and then I'll ask you a question;  
 3 and then I'll read a portion, and then I'll ask you  
 4 a question.  
 5 MR. SKOLNIK: Bob, could you keep your  
 6 voice up?  
 7 MR. LANDY: Yeah, sure.  
 8 MR. SKOLNIK: I'm still having trouble  
 9 hearing you.  
 10 BY MR. LANDY:  
 11 Q. So I'm starting approximately -- starting  
 12 about halfway down the page with Mr. Aviv where he  
 13 starts, "Also update your files," and it goes as  
 14 such.  
 15 "Aviv: Also update your files, if there is,  
 16 find out the latest in the cult. You have anything,  
 17 you know new is going on, because I think that will"  
 18 -- sorry -- "that what will impress her that you  
 19 know about them everything. That's what is going  
 20 currently and things like that."  
 21 "Ross: How's this for impressive: I have  
 22 200 photographs of Raniere at one of his functions.  
 23 I have him in compromising poses with his (sic)  
 24 girlfriends."  
 25 "Aviv: Oh, my God!

1 what we will be discussing is the section on the  
 2 CD that runs from 55 minutes and 32 seconds to 57  
 3 minutes and 34 seconds.  
 4 I've spoken with your counsel while off the  
 5 record, and he's agreed to in lieu of me actually  
 6 playing this excerpt handing out a transcript of the  
 7 excerpt which was prepared by my office. This is  
 8 not an official transcript. We did our best to be  
 9 as accurate as possible.  
 10 MR. CAMPION: Okay. Let's go.  
 11 MR. LANDY: All right, and this is going  
 12 to be marked as Raniere-Exhibit 17.  
 13 (Excerpt From Audio Recording of Meeting  
 14 Among Rick Ross, Juval Aviv, and Lynne Friedman on  
 15 November 23, 2004, consisting of two pages was  
 16 received and marked Defendant's Exhibit Raniere-17  
 17 for Identification.)  
 18 MR. CAMPION: Obviously, the witness and  
 19 his counsel are not in a position to affirm or deny  
 20 the accuracy of the translation, but we accept the  
 21 representation you have made and believe the  
 22 questioning should now proceed.  
 23 MR. LANDY: Okay.  
 24 BY MR. LANDY:  
 25 Q. In the interest of time, I'm not going to go

1 Ross: I have him in the nude. I have, I  
 2 have one picture of him naked standing in front of  
 3 his girlfriend with a red ribbon tied around his  
 4 penis.  
 5 Aviv: No!  
 6 Ross: Which is erect.  
 7 Aviv: Oh, my God! (Laughter)."  
 8 Did Ms. Keeffe tell you about those  
 9 statements that Mr. Ross made?  
 10 A. I believe she mentioned the photograph with  
 11 the ribbon, and I heard that there were many  
 12 photographs supposedly, me in the shower and such  
 13 things. I don't know if it was her.  
 14 Q. Moving on to the second page of the  
 15 transcript, the second quote from Mr. Ross says:  
 16 "Ross: No, I guarantee you she hasn't. I  
 17 have letter written. I can get a copy of a letter  
 18 written in his own hand in which he states all of  
 19 these things (sic) that I am telling you and about  
 20 the Christ child, how you will bear my seed in your  
 21 womb. Crazy stuff and court records that have  
 22 nothing" (sic) -- "that have to do with harassment  
 23 of his former girlfriend."  
 24 Do you know what letter he's referring to  
 25 here? By "he," I mean Mr. Ross.

1 A. No.  
 2 Q. Did Ms. Keffe tell you about this letter?  
 3 A. I don't believe she told me about the letter.  
 4 Q. You can put it aside.  
 5 MR. McGUIRE: Just one second, Bob.  
 6 (A discussion was held off the record.  
 7 MR. LANDY: Go on?  
 8 MR. McGUIRE: Yes.  
 9 MR. LANDY: Okay.  
 10 BY MR. LANDY:  
 11 Q. Do you know whether a purpose of the Ross  
 12 investigation was to find out about Ross' past?  
 13 A. The purpose -- I suspect when you investigate  
 14 someone you do a dossier of some sort on them. I  
 15 don't know if that was the purpose necessarily.  
 16 Q. No. I'm not asking you to speculate. I'm  
 17 asking you whether you know what the purpose was.  
 18 A. I don't know.  
 19 Q. Do you know whether, in fact, Interfor  
 20 collected information about Ross -- Mr. Ross' past?  
 21 A. No, I don't know.  
 22 Q. I won't use the word "purpose" then.  
 23 Do you know whether one of the objections --  
 24 objections -- start again.  
 25 Do you know whether one of the objectives of

1 obtained information concerning who Mr. Ross was in  
 2 communication with?  
 3 A. No, I don't know.  
 4 Q. You partially answered this yesterday, but  
 5 have you ever spoken with anyone who is a member of  
 6 the Church of Scientology?  
 7 A. Yes.  
 8 Q. Have you ever spoken to anyone who is a  
 9 member of the Church of Scientology about Rick Ross?  
 10 A. No -- oh, well, maybe. It's possible.  
 11 Q. Do you know who that conversation would have  
 12 been with?  
 13 A. Sean Bergeron.  
 14 Q. Who is Mr. Bergeron?  
 15 A. I play volleyball with him. He's a student  
 16 at NXIVM. He's a friend. I tutored him in biology.  
 17 Q. But you don't remember the substance of any  
 18 conversations concerning Mr. Ross?  
 19 A. No. It would be just something in passing or  
 20 general.  
 21 Q. Have you ever seen any documents or  
 22 information -- start that again.  
 23 Have you ever seen any documents or  
 24 information concerning Mr. Ross that you understood  
 25 to be from the Church of Scientology or from a

1 the Ross investigation was to find out about  
 2 Mr. Ross' finances?  
 3 A. No, I don't know that.  
 4 Q. Do you know whether Interfor, in fact, did  
 5 learn anything about Mr. Ross' finances?  
 6 A. I've heard from the Metroland article that  
 7 the reporter, Chet Hardin, spoke to Rick Ross on the  
 8 phone and identified that within the report there  
 9 were accurate financial transactions from Rick Ross.  
 10 That's as much as I know. As much as that is true,  
 11 that's as much as I know.  
 12 Q. Did you ever speak to Ms. Keffe about  
 13 financial information that Interfor had uncovered  
 14 concerning Mr. Ross?  
 15 A. No.  
 16 Q. Did you ever speak to Ms. Salzman about it?  
 17 A. No.  
 18 Q. Was one of the objections -- I did it again.  
 19 Start again.  
 20 Was one of the objectives of the Ross  
 21 investigation to find out who Mr. Ross communicated  
 22 with?  
 23 A. I'm not sure. I -- I don't know that for  
 24 sure.  
 25 Q. Do you know whether, in fact, Interfor

1 person affiliated with the Church of Scientology?  
 2 A. Say that again. Have I ever seen any  
 3 documents from --  
 4 Q. Let me start the question again.  
 5 Have you ever seen any documents that you  
 6 understood to be from a representative or a member of  
 7 the Church of Scientology concerning Mr. Ross?  
 8 A. I think so.  
 9 Q. What have you seen?  
 10 A. There is a woman -- I think her name is Nancy  
 11 Anamann or something like that -- who allegedly got  
 12 a whole bunch of information, and it's on a CD and  
 13 available on the Internet or some such thing. I  
 14 have seen some things from that. I believe it's  
 15 from that.  
 16 Q. How did you come to see that information?  
 17 A. I think --  
 18 THE WITNESS: 'Cause this involves an  
 19 attorney.  
 20 MR. CAMPION: Attorney-client privileged  
 21 material will be waived.  
 22 THE WITNESS: Okay.  
 23 A. I'm not sure if I've seen it outside of that.  
 24 I don't know.  
 25 Q. Is it your understanding that Ms. Keffe

1 attended to the day-to-day management of Interfor's  
2 investigations?

3 MR. McGUIRE: Object to the form of that  
4 question.

5 Q. Let me rephrase it.

6 Is it your understanding that Ms. Keeffe was  
7 Interfor's primary contact at NXIVM?

8 A. She was definitely a contact at NXIVM. I  
9 don't know if she was the primary contact because  
10 she and Joe worked very closely together on such  
11 matters.

12 Q. Did Ms. Keeffe ever tell you that Interfor  
13 had collected Mr. Ross' trash as part of the  
14 investigation?

15 A. I don't know if she told me. I have heard  
16 that, and I've seen it in the --

17 Q. When did you --

18 A. -- documentation.

19 Q. Do you know when you first heard it?

20 A. It may have been after Joe left I think I  
21 heard that he had -- maybe he had trash or something  
22 like that that had -- that had something that had to  
23 be -- that had to be decided what to do with or  
24 whatever.

25 Joe was saying all sorts of complaints, and I

1 Q. The answer was?

2 A. No.

3 Q. Okay.

4 A. I'm sorry.

5 Q. Was Interfor's investigation of Rick Ross  
6 part of a larger public relations campaign to  
7 improve NXIVM's image?

8 A. I might classify it that way, I imagine.

9 Q. Have you heard of a company called Sitrick &  
10 Company -- Sitrick & Co.?

11 A. Yes.

12 Q. What is Sitrick & Co.?

13 A. To my knowledge, they're a PR firm.

14 Q. Okay. Do you know whether Sitrick & Co. And  
15 Interfor worked in concert on behalf of NXIVM?

16 A. I'm not sure.

17 Q. What was Sitrick hired to do?

18 A. Create a branding image for NXIVM and to  
19 create positive press. In specific, I think the  
20 head of Sitrick had said that he had a re -- a good  
21 relationship with Forbes magazine so that an article  
22 might be run to counter the other article.

23 Q. Was part of what Sitrick was hired to do to  
24 discredit Mr. Ross?

25 A. I don't know.

1 think at that point I heard that that was from  
2 Rick Ross, possibly from Kristin.

3 Q. Possibly from --

4 A. Kristin.

5 Q. The trash was from Rick Ross. The  
6 information was possibly from Kristin, just to --

7 A. Correct.

8 Q. -- be clear.

9 A. And that's what I heard. I never saw the  
10 trash.

11 Q. Again, the question was when. You testified  
12 around the time that --

13 A. It was that spring. I'm trying to think of  
14 what year it was but --

15 Q. 2005?

16 A. Yeah. It was something like March, somewhere  
17 in there.

18 Q. Were you ever made aware of what the sources  
19 of Interfor's information was?

20 A. No.

21 Q. Do you know whether Interfor received  
22 documents from the Scientologists?

23 A. No.

24 Q. Do you know who Kendrick Moxon is?

25 A. No.

1 Q. I'm going to ask you a couple questions  
2 concerning Ms. Keeffe.

3 Do you have an understanding of what her  
4 responsibilities at NXIVM were in the period of 2004  
5 to 2005?

6 A. Not completely, no.

7 Q. Do you have a partial understanding?

8 A. (No audible response.)

9 Q. What is your partial understanding?

10 A. She worked closely -- well, when Joe was  
11 around, she worked closely with Joe. She also works  
12 closely with the NXIVM attorneys. She does like  
13 paperwork and things like that, and when they need  
14 data, she gather data from what I understand.

15 Q. Is it her job to hire and fire outside  
16 counsel?

17 A. No.

18 Q. Did -- in the period of 2004 and 2005,  
19 are you aware if whether -- are you aware if  
20 Ms. Keeffe ever conducted investigations on her  
21 own on behalf of NXIVM?

22 A. She may have. I don't know. It implies --  
23 when she says things relating to the internet like  
24 Juval Aviv got stuff off of the internet, I mean,  
25 she probably has looked on the internet so...

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1 Q. Between 2004 or in the period of 2004 to 2005  
2 -- let me start the question again.  
3 Do you know whether in the time frame of 2004  
4 or 2005 Ms. Keeffe conducted any surveillance on any  
5 property on behalf of NXIVM?  
6 A. Surveillance on property.  
7 Q. By "property," I mean an address.  
8 A. And surveillance. Where --  
9 Q. I mean, it's -- let me --  
10 A. I have a piece of information, and it may  
11 fall in this bailiwick. I had heard that when Rick  
12 Ross first moved here, he lived in a small  
13 apartment. Now he lives in a very large apartment.  
14 I don't know if she went and looked that on the  
15 internet or how she knows that, but it seems  
16 reasonable if she makes a trip to New Jersey to  
17 drive by an address to see what it looks like. She  
18 seemed to have opinions about it.  
19 Q. What did Ms. Keeffe say when she told you  
20 about Mr. Ross' apartments? Let me back that up.  
21 That assumes that Ms. Keeffe told you that.  
22 How did you come to learn that Ms. Keeffe  
23 knew what Mr. Ross' apart -- two apartments looked  
24 like?  
25 A. How did -- I'm sorry.

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1 Q. How did you come to learn that Ms. Keeffe had  
2 an understanding of what Mr. Ross' apartments looked  
3 like?  
4 A. She told me that she thinks Mr. Ross has a  
5 good degree of wherewithal.  
6 Q. Did she say anything else during that  
7 conversation concerning Mr. Ross?  
8 A. No.  
9 Q. Did Ms. Keeffe ever tell you that she had  
10 obtained Mr. Ross' phone records?  
11 A. No.  
12 Q. Did Ms. Keeffe ever tell you that she  
13 obtained Ms. Natalie's phone records?  
14 A. No.  
15 Q. Has Keith Raniere always been your legal  
16 name?  
17 A. Yes.  
18 Q. I'm sorry.  
19 A. Alan --  
20 Q. Has Keith Alan Raniere always been --  
21 A. Yes.  
22 Q. -- your legal name?  
23 In the period of 2004 to 2005, did you have  
24 an office?  
25 A. Probably not. No, I don't think so.

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1 Q. Have you ever been arrested?  
2 A. I don't know. I did a traffic infraction  
3 once.  
4 Q. If that's your answer, that's fine.  
5 A. Yeah, I -- yeah.  
6 Q. Have you ever been convicted of a crime?  
7 A. No.  
8 Q. Bear with me for about two minutes. I think  
9 I'm done. I'll just review my notes.  
10 Do you know whether NXIVM and Frank Parlato,  
11 Jr. Ever had a falling out?  
12 A. I believe so.  
13 Q. Do you know the circumstances of that?  
14 A. No, I don't know the complete circumstances.  
15 Q. Do you know who would?  
16 A. Kristin probably would.  
17 Q. Would Ms. Salzman?  
18 A. I suspect she would, but I'm not sure.  
19 MR. LANDY: That's a different day.  
20 I'll actually ask her.  
21 All right. I think I got one follow-up.  
22 Let me look at my notes from earlier.  
23 Sir, thank you for your time. I have no  
24 further questions.  
25 THE WITNESS: Thank you.

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1 MR. SKOLNIK: The record should reflect  
2 that I'm going to start questioning Mr. Raniere now.  
3 I have several hours of questions for Mr. Raniere,  
4 and I have already been advised by counsel that  
5 you're planning to cut this deposition off today at  
6 5:30. If that's the case, rest assured that I'll be  
7 making an application to the Court for another --  
8 another day, and I would suggest and I want it on  
9 the record that I'm suggesting that before we all  
10 adjourn today, since we are all here, that we try  
11 to agree upon an adjourned date.  
12 I'm assuming that you'll oppose the  
13 application for another date, but I think that we  
14 ought to agree upon a resumed date of the deposition  
15 if Judge Falk or Judge Cavanaugh grants my request  
16 to continue the deposition.  
17 MR. CAMPION: Mr. Skolnik, we're  
18 prepared to go until 7:00 today if that will  
19 conclude the deposition.  
20 MR. SKOLNIK: It will not.  
21 MR. CAMPION: Okay.  
22 MR. McGUIRE: That would take us to more  
23 than two days.  
24 MR. SKOLNIK: I mean, the record -- the  
25 record will reflect the amount of time that

1 Mr. Raniere has actually been questioned when you  
2 take into consideration among other things the break  
3 that we all took yesterday for the best part of  
4 almost two hours for our negotiation; but that  
5 aside, no matter how many hours have actually been  
6 placed on the record, I'm going to be applying for a  
7 new amount of time.

8 MR. CAMPION: Okay.

9  
10 CROSS-EXAMINATION BY MR. SKOLNIK:

11 Q. Mr. Raniere, I think you know I'm Peter  
12 Skolnik, and I represent the Ross defendants and the  
13 Martin defendants; and the same rules that have been  
14 applying for the questioning by other counsel apply  
15 as well.

16 You understand that?

17 A. Yes.

18 Q. And you understand you're still under oath?

19 A. Yes.

20 Q. Okay. You testified earlier today that  
21 Frank Parlato had been hired to generate positive  
22 press for NXIVM, is that right?

23 A. I believe so.

24 Q. Why?

25 A. I imagine because NXIVM has negative press.

1 consultant.

2 Q. Who was that consultant?

3 A. I think it was Steve Pigeon, but I'm not  
4 sure.

5 Q. And what kind of consulting did Mr. Pigeon do  
6 for NXIVM?

7 A. I don't know exactly. I think he's a lawyer.

8 Q. You testified that you found Mr. Parlato to  
9 be aggressive.

10 A. Yes.

11 Q. In what way was he aggressive?

12 A. In the way he spoke, in the way he moved, in  
13 some of the things that he said.

14 Q. What kinds of things did he say?

15 A. He believed that making statements to the  
16 media was good and stating things that he believed  
17 to be true to the media was good. I believe that if  
18 you deal with the media, they may well take what you  
19 say or not. They may take it out of context, and he  
20 believed in speaking to the media, talking to the  
21 media, giving interviews with the media and things  
22 like that.

23 Q. Did he ever tell you that he thought making  
24 misrepresentations to the media was in NXIVM's best  
25 interests?

1 Q. So what kind of press in particular was  
2 Mr. Parlato hired to try to generate?

3 A. I don't know specifically.

4 Q. Do you know generally?

5 A. I imagine positive articles, positive stories  
6 relating to NXIVM.

7 Q. And what is the basis for your knowledge  
8 about Mr. Parlato's assignment?

9 A. Some things that Mr. Parlato has told me.

10 Q. Do you know about his assignment from anyone  
11 other than Mr. Parlato himself?

12 A. Somewhat from Kristin Keeffe, I believe.

13 Q. What did Kristin Keeffe tell you?

14 A. I think she had a great degree of belief in  
15 Frank's ability to handle the media, that he was  
16 strong, that he had media connections so that he  
17 could get events covered and positive press.

18 Q. How did she know Mr. Parlato?

19 A. She worked with him quite a bit. I think  
20 they were friends.

21 Q. When you say she worked with him, she worked  
22 with him prior to her involvement with NXIVM or  
23 prior to his involvement with NXIVM?

24 A. No. It's my understanding she met him  
25 through NXIVM. I think she met him through a NXIVM

1 A. No, and that's something that I would not  
2 agree with.

3 Q. But he never told you that?

4 A. No.

5 Q. And he never told you that he was going to  
6 use aliases to represent NXIVM to the media?

7 A. No.

8 Q. What did you conclude when you found out  
9 about that?

10 A. Found out about?

11 Q. That he had used an alias in talking to the  
12 media.

13 A. I found out about that today.

14 Q. And how did you react today?

15 A. I -- I think it's horrible. I don't agree  
16 with it.

17 Q. Now, you told us that you and Mr. Parlato  
18 discussed Mr. Ross, and I think you said that --  
19 that Mr. Parlato's opinion was that Mr. Ross was  
20 the lowest of the low.

21 Was that your phrase?

22 A. Yes.

23 Q. What was the basis for his opinion?

24 A. I don't know.

25 Q. Did you ask him?

1 A. He said to me, "I know his type."  
 2 I believe his basis for the opinion was  
 3 reading what was on the internet.  
 4 Q. Did you ask him what the basis for his  
 5 opinion was?  
 6 A. No.  
 7 Q. Do you simply take people's word for that  
 8 kind of thing without investigating what -- what  
 9 they're talking about?  
 10 A. I think you're assuming that I believed what  
 11 he said. I believe that he believed that. I didn't  
 12 think he was lying to me, that he believed Ross was  
 13 the lowest of the low.  
 14 Q. So you didn't explore the subject with him at  
 15 all? You didn't -- you didn't challenge him?  
 16 A. No.  
 17 Q. We need verbal answers.  
 18 A. No, I did not challenge him.  
 19 Q. Now, you testified that you told Joseph  
 20 O'Hara to hire both of the firms that had been  
 21 suggested by Nolan & Heller.  
 22 A. I suggested.  
 23 Q. Right, and that you suggested they both be  
 24 given a simple assignment and to compare the  
 25 results.

1 investigators?  
 2 A. Yes. As a matter of fact, I think he  
 3 originally approached because he wanted to find  
 4 someone who would find Kris Snyder.  
 5 Q. Why did he want to find someone who could  
 6 find Kris Snyder?  
 7 A. Because some people believe, as I do, that  
 8 Kris Snyder is likely alive.  
 9 Q. Were either of the simple assignments that  
 10 you suggested be given to the two firms suggested by  
 11 Nolan & Heller related to the search for Kristin  
 12 Snyder?  
 13 MR. LANDY: I warn counsel that we're  
 14 now going into an area that's outside of Judge  
 15 Treece's opinion concerning which portion of  
 16 Interfor's relationship with NXIVM the  
 17 attorney-client privilege had been waived on.  
 18 THE WITNESS: Also, I believe Joe O'Hara  
 19 was my attorney.  
 20 MR. LANDY: I can't instruct anyone to  
 21 answer or not answer. I'm just making a statement.  
 22 MR. CAMPION: Could I have the question  
 23 again, please?  
 24 MR. SKOLNIK: Could you read it back?  
 25 (The following was read back by the

1 A. Uh-huh.  
 2 Q. Why was O'Hara suggesting that NXIVM hire any  
 3 firm?  
 4 MR. McGUIRE: Object to the form of the  
 5 question.  
 6 Q. You can answer.  
 7 A. I don't understand. Oh --  
 8 MR. CAMPION: You may answer.  
 9 THE WITNESS: Okay.  
 10 A. I think there is a suspicion -- was a  
 11 suspicion that there was money politically put  
 12 against us so that we did not get good press and  
 13 that we did not get a fair hearing in the media and  
 14 in the political arenas. So the question has always  
 15 been if this is true; and then if this is true, who,  
 16 how, what is -- what is behind it?  
 17 Q. Who had that suspicion?  
 18 A. I -- I think I've shared that suspicion to a  
 19 degree. I think Nancy shares that suspicion. I  
 20 think Kristin shares that suspicion. I think a  
 21 number of people do.  
 22 Q. Who suggested to Mr. O'Hara that he try to  
 23 get names of investigators?  
 24 A. I don't know.  
 25 Q. Did he approach you about the idea of hiring

1 reporter:  
 2 "Were either of the simple assignments  
 3 that you suggested be given to the two firms  
 4 suggested by Nolan & Heller related to the search  
 5 for" --)  
 6 MR. CAMPION: Okay. That does not  
 7 involve a privilege question.  
 8 Continuing...  
 9 A. I didn't specify the assignment. I said it  
 10 should be simple and verifiable.  
 11 Q. I want to ask you to call upon your powers of  
 12 recall and give me the best recollection you have  
 13 today of the sequence of your knowledge about  
 14 NXIVM's involvement with Interfor.  
 15 What did you know, when did you know it, and  
 16 who did you know it from?  
 17 A. I knew from Joe O'Hara that there existed  
 18 Interfor. They were one of two firms that Nolan &  
 19 Heller, an attorney firm, had used or suggested and  
 20 I don't know which. I was aware I think NXIVM ended  
 21 up using both firms on an ongoing basis. I don't  
 22 know how long the other firm was used.  
 23 Q. Do you know what the other firm was used for?  
 24 A. No.  
 25 MR. McGUIRE: Mr. -- oh, I'm sorry.

1 Go ahead. Finish your answer. I beg  
 2 your pardon.  
 3 THE WITNESS: Okay.  
 4 A. I do consider Joe O'Hara my attorney so I  
 5 don't know what to --  
 6 MR. McGUIRE: Well, that's what I was  
 7 just going to put on the record.  
 8 At the last deposition -- I think it was  
 9 of Ms. Keefe -- it was agreed that we would reserve  
 10 our rights concerning the attorney-client  
 11 relationship with Mr. O'Hara.  
 12 So with your agreement, I will stipulate  
 13 or you will stipulate and the two of us will  
 14 stipulate that we're reserving all of those rights.  
 15 MR. SKOLNIK: Agreed.  
 16 MR. McGUIRE: Okay.  
 17 MR. CAMPION: Continue to answer the  
 18 question without reference to conversations with  
 19 O'Hara.  
 20 MR. McGUIRE: Unless they took place  
 21 after a point in time where in the Treece opinion  
 22 O'Hara conceded that he became the attorney for  
 23 NXIVM. I think that was sometime in July, if I  
 24 recall.  
 25 MR. SKOLNIK: So the record is clear --

1 by counsel without reference to communications  
 2 between you and O'Hara, okay.  
 3 THE WITNESS: Do I delete them?  
 4 MR. CAMPION: Indicate at the beginning  
 5 of your answer that you are not including those  
 6 conversations, okay.  
 7 THE WITNESS: Okay.  
 8 How do -- if I have found factual  
 9 information through O'Hara that I know, how do I  
 10 add that in?  
 11 MR. CAMPION: There's the communication  
 12 that is privileged. What you do with the result of  
 13 the communication may not be privileged, okay.  
 14 Proceed.  
 15 THE WITNESS: Okay.  
 16 Continuing...  
 17 A. I'm trying to think of what I heard next. I  
 18 have heard that -- I heard that Juval had some  
 19 incredible stories about what was going on with us  
 20 politically. I heard that Juval had said that the  
 21 Legions of Christ from Mexico were against us, but  
 22 the Masons were for us and that the Legions of  
 23 Christ -- some representative from there had come up  
 24 to New York and given Senator Alphonse D'Amato a  
 25 substantial portion of money to go and execute

1 and, Mr. Campion, for your benefit because I know  
 2 you haven't been following all of this for as long  
 3 as the rest of us -- it's our position that the  
 4 rulings that Judge Falk has made and that Judge  
 5 Treece has made make the entire Interfor  
 6 investigation outside of the attorney-client  
 7 privilege.  
 8 There were findings about the Crime  
 9 Fraud Doctrine, so it's our position that there is  
 10 no attorney-client privilege attaching to Mr. O'Hara  
 11 or to any other aspect of that investigation.  
 12 That's the basis upon which Mr. McGuire and I and  
 13 other counsel came to an agreement about such  
 14 questions during the Keefe deposition.  
 15 MR. CAMPION: Okay.  
 16 MR. McGUIRE: That's an overstatement.  
 17 And let me quote from the Treece opinion, which is  
 18 that "Ross and O'Hara should not conclude that this  
 19 decision and order has opened the corral doors to  
 20 allow that which may be protected by the  
 21 attorney-client privilege be trampled. It is very  
 22 limited and it does not include the whole Interfor  
 23 relationship."  
 24 MR. CAMPION: In any event, so that we  
 25 can continue this, you may answer the question put

1 agenda items against us.  
 2 Q. All right. Let me interrupt you just so that  
 3 we could get the sequence here --  
 4 MR. McGUIRE: Well --  
 5 Q. -- because what I'm interested in is the  
 6 sequence.  
 7 MR. McGUIRE: Mr. Skolnik, let him  
 8 answer the question. You want to follow up on it,  
 9 fine, but you --  
 10 MR. SKOLNIK: How many lawyers are  
 11 making objections here?  
 12 MR. McGUIRE: Wait a minute. Just a  
 13 second. I don't interrupt you. Please don't  
 14 interrupt me. We'll get along much better.  
 15 We can all sing together, but we can't  
 16 talk together.  
 17 You asked him a question. The gentleman  
 18 was in the process of giving you an answer. Wait  
 19 until he finishes his answer. Then if you have any  
 20 objection, move to strike anything or have any  
 21 additional questions, proceed; but you do not have  
 22 the right unilaterally to stop this man from  
 23 answering a question.  
 24 MR. CAMPION: Mr. Skolnik, it appeared  
 25 to me it was an open-ended question.

1 MR. SKOLNIK: It was indeed an  
2 open-ended question, but I was asking for sequence;  
3 and it seemed to me that we would be better able to  
4 establish sequence if I occasionally asked for some  
5 time frames.

6 But if you want to go and give me the  
7 entire story, then we'll backtrack on it. We're  
8 just going to be here longer.

9 MR. CAMPION: Continue with the answer.  
10 Continuing...

11 A. That was the next thing I remember now  
12 hearing about it and that I also heard then that  
13 Juval had a neighbor that knew Alphonse D'Amato and  
14 that Alphonse D'Amato could be, if you will, stopped  
15 as far as harassing us and that, in fact, Alphonse  
16 D'Amato no longer had much interest in it because he  
17 had done what he was paid for.

18 I'm not sure what time those series of events  
19 that I heard from Interfor. I am not sure if I  
20 actually heard that before I met Juval Aviv, the  
21 night that I met him at Nancy's. I think I heard  
22 that afterwards. When I met Juval, he was telling  
23 me at Nancy's about himself; and I think had I known  
24 that information, I would have evaluated the data  
25 differently.

1 Q. Okay. Did you meet Mr. Aviv at Nancy  
2 Salzman's house before or after the investigation  
3 had commenced?

4 A. I think it was after, although I don't know  
5 when the investigation commenced 'cause Rick --  
6 because Juval mentioned Ross in conversation. So I  
7 imagine that if he was mentioning Ross like that, he  
8 would have already been investigating.

9 Q. Did he mention anything about the meeting  
10 that had been conducted with Mr. Ross?

11 A. No.

12 Q. Were you aware at the time you met Mr. Aviv  
13 that a meeting with Mr. Ross had taken place?

14 A. No.

15 Q. Who told you about Juval Aviv claiming to  
16 have had a prior relationship with Rick Ross and had  
17 been asked to fabricate evidence?

18 A. I believe Kristin Keeffe told me that. It  
19 may have been that Juval mentioned that at Nancy's  
20 house.

21 Q. Are you saying that you either heard it from  
22 Kristin Keeffe or you heard it directly from Juval?

23 A. Or both.

24 Q. Or both, but you can't recall today?

25 A. No, I cannot.

1 I don't remember where in the sequence of  
2 events was the first time that I heard that Juval  
3 had a preexisting relationship with Rick Ross. I  
4 heard that Juval had this preexisting relationship  
5 and that allegedly Juval did not want to work with  
6 Rick Ross because allegedly Rick Ross wanted him to  
7 fabricate evidence.

8 I'm not sure about when I heard the results  
9 of the sting, so to speak, or whatever you want to  
10 call it. I did hear that there was a meeting and  
11 that the meeting was recorded and that there were  
12 representations made in the meeting which -- some of  
13 which I've said already.

14 Is there more?

15 Q. The information that you heard about Juval  
16 Aviv's statements about Senator D'Amato and the  
17 Children of Christ, did you hear that information  
18 about Mr. Aviv before the investigation itself of  
19 Rick Ross commenced?

20 A. I don't know. I don't know when the  
21 investigation of Rick Ross commenced.

22 Q. So you might have heard it before the  
23 investigation commenced, and you might have heard  
24 it while the investigation was ongoing?

25 A. Yes, I think that that may be so.

1 Q. When you became aware of the fact that NXIVM  
2 had retained Interfor to investigate Mr. Ross, you  
3 knew that a lawsuit against Mr. Ross by NXIVM was  
4 already pending; didn't you?

5 A. I'm not sure of the sequence. I think that's  
6 possible.

7 Q. But you never discussed with anyone the  
8 propriety of --

9 A. I would have had -- I believe I would have  
10 had to have known because Joe O'Hara came on after  
11 the lawsuit with NXIVM; and Joe O'Hara hired Nolan &  
12 Heller which hired Juval's firm, so yes.

13 Q. Okay, and did you ever discuss with anyone  
14 the propriety of NXIVM arranging to interview  
15 Mr. Ross through Interfor without Mr. Ross having  
16 counsel present while a lawsuit against him was  
17 pending?

18 MR. McGUIRE: Object to the form of that  
19 question.

20 A. No.

21 Q. You told us that Kristin Keeffe was friendly  
22 with Juval Aviv.

23 A. Yes.

24 Q. How was she friendly? How did she know him?

25 A. Well, I think she met him professionally, but

1 it was my impression that they became friends.

2 Q. Did they become friends before he was  
3 retained by NXIVM?

4 A. I don't know for sure. I don't think -- no,  
5 it wouldn't make sense that she would have.

6 Q. Do you have any understanding about whether  
7 she had a prior relationship with Mr. Aviv while she  
8 worked at NXIVM?

9 A. In other words, did she know -- did she have  
10 a relationship with Mr. Aviv before Mr. Aviv came to  
11 NXIVM's attention?

12 Q. Yes.

13 A. Okay. I don't know Kristin's personal life,  
14 but I don't have that impression.

15 Q. To your knowledge, has Kristin Keeffe ever  
16 been arrested?

17 A. No. I don't know for sure.

18 Q. You never heard that she was arrested  
19 breaking into Toni Natalie's house?

20 A. Oh, I heard that there was -- okay, then she  
21 was probably arrested. Yes, I heard that she  
22 delivered a present to Toni Natalie and that Toni  
23 Natalie waged a complaint against her and that they  
24 went to court over it.

25 Q. Who told you that she was delivering a

1 Q. Whose job at NXIVM is it to hire outside  
2 counsel?

3 A. I think ultimately it's Nancy's. She has not  
4 had that job the whole time, being it was Joe's job  
5 for a time. There was also another woman at one  
6 point who was acting as a counsel. I don't know if  
7 -- I think there was another man named Alan Korman  
8 who also had that job.

9 Q. When NXIVM hires outside counsel, are you  
10 consulted?

11 A. Often not. Sometimes I have been.

12 Q. Have you been consulted about the counsel  
13 that NXIVM has hired to represent it in this  
14 litigation?

15 A. Which one?

16 Q. Funny you should ask.

17 Have you been involved in the decisions that  
18 have been made periodically to replace counsel?

19 A. I think sometimes comments I have made have  
20 fomented the replacement of counsel. No, I am not  
21 involved with that.

22 Q. I want to clarify some of your testimony in  
23 response to Mr. Kofman's questions yesterday.  
24 Excuse me.

25 You have no personal knowledge that Rick Ross

1 present to Toni Natalie?

2 A. Kristin did.

3 Q. Are you under the impression that she was  
4 delivering this present when Toni Natalie was home?

5 A. Yes.

6 Q. So it's not your understanding that she was  
7 breaking into Toni Natalie's house?

8 A. Correct.

9 Q. Okay, and it's not your impression that she  
10 was trying to uncover the very letter that is  
11 referred to in the transcript that we looked at  
12 earlier?

13 A. A letter -- oh, no. No.

14 Q. What did you discuss with Mr. Bergeron about  
15 Rick Ross?

16 A. I don't -- you know, over time, because he's  
17 a friend and I see him two, three times a week, I  
18 said to him -- and I tutor him -- he has read the  
19 internet that Rick Ross thinks we're like  
20 Scientology and different things, so I think it's  
21 his opinion that we're not like Scientology.

22 He asks sometimes, you know, "How is the  
23 legal stuff going, do you know? How is the PR  
24 going?" You know, "What's going on?" Those sort of  
25 things.

1 told Aaron Kassin or anyone else that he "wanted  
2 NXIVM's confidential information," isn't that right?

3 A. When you say "personal knowledge," did I hear  
4 him say that directly? No.

5 Q. Well, you didn't hear him say it directly?

6 A. No.

7 Q. So what, if any, basis do you have for  
8 believing that Rick Ross told Aaron Kassin that he  
9 wanted NXIVM's personal information?

10 A. I think I saw it in some of the papers here,  
11 and I think I remember hearing it maybe from Michael  
12 Sutton.

13 Q. Okay. But, again, you have no personal  
14 knowledge about that?

15 A. Correct.

16 Q. And is it also true that you have no personal  
17 knowledge of the actual process through which NXIVM  
18 materials were given to Rick Ross?

19 A. Correct.

20 Q. Kristin Keeffe asked you to look for any  
21 notes that you had taken either on or about the  
22 three articles, is that right?

23 A. Yes.

24 Q. And you didn't find any?

25 A. No written notes. I believe there were some

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1 documents that I turned over.  
 2 Q. Who did you turn them over to?  
 3 A. I think I gave them to Kristin or -- I don't  
 4 know if Joe was involved or whatever. I don't know  
 5 who I gave them to specifically.  
 6 Q. And when you say you think there were some  
 7 documents, documents of what nature?  
 8 A. Word-type files, either printouts of them or  
 9 the files themselves.  
 10 Q. You remember there being such documents?  
 11 A. Yes.  
 12 Q. And you remember turning them over to  
 13 someone?  
 14 A. I believe so.  
 15 Q. And you might have turned them over to  
 16 Kristin Keeffe?  
 17 A. Yes.  
 18 Q. And you might have turned them over to who  
 19 else?  
 20 A. Joe O'Hara.  
 21 Q. To Joe O'Hara. Anyone else that you might  
 22 have turned them over to?  
 23 A. Not that I can think of.  
 24 MR. SKOLNIK: Let me request on the  
 25 record those documents have never been produced in

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1 this litigation. To the extent that NXIVM is in  
 2 possession of them, I'd call for their production.  
 3 THE WITNESS: NXIVM wouldn't be unless  
 4 they turned them over.  
 5 MR. McGUIRE: We've given you everything  
 6 we have.  
 7 When I say "we," we and prior counsel.  
 8 BY MR. SKOLNIK:  
 9 Q. Were all of the requests that Kristin Keeffe  
 10 made to you to look for documents, specific ones  
 11 like look for X or look for Y, as opposed to look  
 12 for any documents relating to this litigation?  
 13 A. No. They're normally more general, although  
 14 there have been times when there have been specific  
 15 requests.  
 16 Q. And did those requests invariably come from  
 17 Kristin Keeffe?  
 18 A. No.  
 19 Q. Who else made those requests?  
 20 A. Joe O'Hara, Bob Leonard.  
 21 Q. Since Joe O'Hara has no longer been involved  
 22 in the litigation, did anyone other than Kristin  
 23 Keeffe and your attorneys make those requests?  
 24 A. I don't believe so.  
 25 When you say my attorneys, not me

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1 specifically, but NXIVM.  
 2 Q. NXIVM's attorneys.  
 3 And you may have answered this previously,  
 4 but I can't recall. Did anyone ever come and search  
 5 through your documents?  
 6 A. Search through my documents?  
 7 Q. Yeah, looking for documents --  
 8 A. Not at my house. In the storage area, yes.  
 9 Q. In the storage area?  
 10 A. Yeah.  
 11 Q. Who searched in the storage area?  
 12 A. I don't know.  
 13 Q. And what about documents at your house?  
 14 A. I looked for them.  
 15 Q. No one else came --  
 16 A. No one else.  
 17 Q. -- and helped you look for them?  
 18 A. Right, correct.  
 19 Q. Are those the only two places where you might  
 20 have had any documents relating to this lawsuit?  
 21 A. I believe so.  
 22 Q. Did anyone ever examine the e-mails on your  
 23 computers?  
 24 A. No, just me.  
 25 Q. Since this litigation began, have you deleted

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1 any e-mails whatsoever from your computer relating  
 2 in any way to the litigation or the issues in the  
 3 litigation?  
 4 A. Well, I've had different computers; and I've  
 5 had different hard drives. No, I haven't  
 6 specifically deleted them, but they have been  
 7 deleted as a matter of that course.  
 8 Q. When you say, "as a matter of that course,"  
 9 the replacing of computers?  
 10 A. Yes.  
 11 Q. But no one ever told you that those had to be  
 12 preserved?  
 13 A. No, and I'm not aware of that many of them.  
 14 I don't -- I don't think there was even anything I  
 15 was receiving that was important, as far as that  
 16 goes.  
 17 Q. Well, what about -- what about documents?  
 18 Since this litigation has begun, have you destroyed  
 19 any documents that relate in any way to the issues  
 20 in this litigation?  
 21 A. No.  
 22 Q. Have you thrown away any documents that  
 23 relate in any way to this litigation?  
 24 A. No, not that I know of. I have not thrown  
 25 away documents.

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1 Q. Well, when you say not that you know of, what  
 2 do you mean by that?  
 3 A. My house is a mess. I have things in piles.  
 4 There have been times when people have come and  
 5 changed my piles. Things have been thrown out, and  
 6 sometimes things have been thrown out that are  
 7 important to me. I do not have track of all my  
 8 papers.  
 9 Q. You told us a few minutes ago that no one  
 10 came to your house to search for documents.  
 11 A. Correct.  
 12 Q. Have you searched through all of those piles  
 13 in your house for documents responsive to this  
 14 lawsuit?  
 15 A. Yes.  
 16 Q. When did you do that?  
 17 A. I've done it on several occasions. I did it  
 18 just recently and -- I don't know -- probably there  
 19 was I imagine some discovery requests in the past  
 20 year or two.  
 21 Q. And in your -- in your more recent searches  
 22 through these documents, have you found other  
 23 documents and turned them over?  
 24 A. No. There are no other documents.  
 25 Q. You testified that you took one course in

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1 neuro linguistic programming in the 1980s, is that  
 2 correct?  
 3 A. Yes.  
 4 Q. Where did you take that course?  
 5 A. In my home.  
 6 Q. From whom?  
 7 A. A woman named Lynn Stafford Clark.  
 8 Q. She came to your home and taught just you, or  
 9 was it a group?  
 10 A. No, it was a group.  
 11 Q. Did you keep any materials from her course?  
 12 A. No.  
 13 Q. Did she give you any materials?  
 14 A. Not that I know of.  
 15 Q. Did you use any of the knowledge that you  
 16 gained from this course in your development of the  
 17 Rational Inquiry Method?  
 18 A. That's a very broad question. If you believe  
 19 in the theory that in any one moment you use all of  
 20 the things that you've been exposed to, then yes.  
 21 Have I directly taken something from neuro  
 22 linguistic programming and put it into the Rational  
 23 Inquiry Method, no.  
 24 THE VIDEOGRAPHER: Excuse me. We have  
 25 to change tapes.

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1 MR. SKOLNIK: Why don't we take five  
 2 minutes?  
 3 MR. CAMPION: Sure.  
 4 (At this point, there was a short  
 5 recess.)  
 6 THE VIDEOGRAPHER: This is the beginning  
 7 of Tape Number 6. The time is 4:17.  
 8 BY MR. SKOLNIK:  
 9 Q. Mr. Raniere, you have no personal knowledge  
 10 of discussions, if any, between Rick Ross and  
 11 Stephanie Franco relating to whether or not she had  
 12 a confidentiality agreement; isn't that right?  
 13 A. Correct.  
 14 Q. What material, if any, did the Dalai Lama's  
 15 representative review before agreeing to the program  
 16 that you're planning with the Dalai Lama?  
 17 A. I don't know all the details. He went  
 18 through I believe a 16-day Intensive. I believe he  
 19 interviewed and spent time with people within the  
 20 organization. He interviewed me.  
 21 Q. When did he interview you?  
 22 A. I don't know, maybe a year ago.  
 23 Q. And what did you discuss?  
 24 A. Um, he asked all different things; and he's  
 25 also been involved in a lot of the discussions I've

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1 had with the people from Mexico. We had a bunch of  
 2 people come up with Mexi -- from Mexico, and he was  
 3 in that where we're talking about the different ways  
 4 of working the peace movement down there. And I was  
 5 using him as an advisor in part because of his I  
 6 will say extreme experience.  
 7 Q. In any of your discussions with the Dalai  
 8 Lama's representative, did you discuss any aspects  
 9 of the Rational Inquiry Method?  
 10 A. I don't suspect so.  
 11 Q. Do you recall whether you did or not?  
 12 A. Not directly, but the conversations that I  
 13 do recall we did not.  
 14 Q. But there are conversations that you don't  
 15 recall?  
 16 A. Possibly.  
 17 Q. And you testified yesterday that you're not  
 18 sure whether or not the Dalai Lama's representative  
 19 signed a confidentiality agreement, is that correct?  
 20 A. Yes, but I asked Nancy, and she said she  
 21 believes he did.  
 22 Q. She believes he did?  
 23 A. Yes.  
 24 Q. But you have no -- you have no knowledge of  
 25 that other than what Nancy told you?

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1 A. Correct.

2 Q. To your knowledge, has anyone ever been given

3 access to parts of the Rational Inquiry Method or

4 other NXIVM course material without signing a

5 confidentiality agreement?

6 A. That's correct. That's in part why I

7 answered that I don't believe I discussed any of

8 the Rational Inquiry Method with Lama Tenzin.

9 Q. Let me -- let me ask my question again.

10 To your knowledge, has anyone ever been

11 given access to parts of the Rational Inquiry Method

12 or other NXIVM materials without signing a

13 confidentiality agreement?

14 A. No.

15 Q. No one under any circumstances?

16 A. Correct.

17 Q. I'm going to refer to the Exhibit that has

18 been marked as Ranieri-11.

19 MR. CAMPION: This would be the

20 Affidavit.

21 THE WITNESS: Okay. Should I just take

22 it?

23 MR. CAMPION: No, that's my copy.

24 THE WITNESS: I got it.

25 (A discussion was held off the record.)

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1 Q. And for the record, you've already identified

2 this as an Affidavit --

3 A. Uh-huh.

4 Q. -- that you signed.

5 A. Yes.

6 Q. And it's an Affidavit dated or sworn to on

7 the 22nd day of August, 2003; is that right?

8 A. Let me get to the page.

9 August 22nd, 2003, yes.

10 Q. Let me ask you to turn to Paragraph 9.

11 A. (Witness complies.)

12 Paragraph 9. I'm sorry.

13 Q. And I'm going to read you some or all of the

14 paragraph and then ask you some questions about it.

15 "I discovered I had an exceptional aptitude

16 for Mathematics and computers when I was 12. It was

17 at the age of 12 I read The Second Foundation by

18 Isaac Asimov and was inspired by the concepts on

19 optimal human communication to start to develop the

20 theory and practice of Rational Inquiry. This

21 practice involves analyzing and optimizing how the

22 mind handles data. It involves mathematical set

23 theory applied in a computer programmatic fashion to

24 processes such as memory and emotion. It also

25 involves a projective methodology that can be used

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1 for optimal communication and decision making."

2 Did I read that correctly?

3 A. I believe so.

4 Q. Is Rational Inquiry based at all on the ideas

5 of Isaac Asimov?

6 A. As I said, it's a two-handed question. You

7 would say certainly it was inspired by, but Isaac

8 Asimov did not to my knowledge exhibit Rational

9 Inquiry.

10 Q. But some of Rational Inquiry is inspired by

11 or based upon Isaac Asimov's ideas, is that correct?

12 A. I think that would be fair to say.

13 Q. How did Isaac Asimov's ideas inspire and

14 influence the theory and practice of Rational

15 Inquiry?

16 A. In Isaac Asimov's book there is a group

17 called The Second Foundation who had optimized

18 communication, so with a minimal amount of words or

19 sounds or motions they could communicate very large

20 amounts of information. I thought that was

21 interesting that one could communicate more or less

22 by how they spoke, what they -- how they moved. So

23 I started playing with that idea of what is the true

24 nature, if you will, or different nature of

25 communication other than just the words.

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1 Q. And how is that idea reflected in the

2 Rational Inquiry Method?

3 A. Well, as I started to examine human

4 communications, I started to understand more and

5 discover things. Those discoveries ultimately led

6 to things within Rational Inquiry.

7 Q. What concepts of Rational Inquiry did you

8 develop at the age of 12?

9 A. I don't know if I developed any of them at

10 the age of 12. I think the precursors to what is

11 Rational Inquiry today were started back then.

12 Q. When you say the precursors were started back

13 then, in what way were they started?

14 A. I started to experiment with human

15 communication, with the more programmatic aspects of

16 human communication and also the more expressive,

17 less programmatic aspects; examining things like

18 free will and possibly why a human would behave a

19 certain way or not. That curiosity ultimately led

20 to the codification of what is known as Rational

21 Inquiry.

22 Q. These experiments that you began to do at the

23 age of 12, did you tell anyone about them?

24 A. Well, not -- I mean, for me to say over the

25 past 30 years have I told anyone about any

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1 experiments that I do, I certainly have.  
 2 I had a friend that we played a game where  
 3 we tried to communicate optimally to each other with  
 4 minimal amounts of speech from the book. We did  
 5 that for about a week. He became tired of it.  
 6 Q. When you say "from the book," from what book?  
 7 A. The Second Foundation.  
 8 Q. Did you ever write down your thoughts or your  
 9 experiments --  
 10 A. I think over the years --  
 11 Q. -- at this period?  
 12 A. This period, no.  
 13 Q. At some later period?  
 14 A. Probably.  
 15 Q. What do you remember writing down?  
 16 A. I -- I mean, I've written many computer  
 17 programs; and I've, you know, written many notes  
 18 about my thoughts on different things and my  
 19 thoughts on mathematics in particular.  
 20 Q. What about your thoughts that became parts of  
 21 the Rational Inquiry Method?  
 22 A. You could say in some ways all of those  
 23 thoughts were inspirational to the Rational Inquiry  
 24 Method.  
 25 Q. Well, beyond being inspirational, are any of

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1 them embodied in the Rational Inquiry Method?  
 2 A. No, because the Rational Inquiry Method was  
 3 a -- a type of discovery that occurred from having  
 4 many different events and then drawing a specific  
 5 conclusion about how the basis elements of any  
 6 behavior and human endeavor --  
 7 THE WITNESS: Is it okay that I --  
 8 MR. CAMPION: Go ahead and talk.  
 9 THE WITNESS: Okay.  
 10 Continuing...  
 11 A. -- the basis elements of any human endeavor  
 12 can be codified and maximized and the nature of how  
 13 abstract mathematics could be utilized to help with  
 14 human endeavors and athletic endeavors and mental  
 15 endeavors and things like that.  
 16 Q. And as you were developing Rational Inquiry,  
 17 did you write down any of those conclusions you were  
 18 drawing?  
 19 A. I think it was more of a quick discovery, but  
 20 probably not.  
 21 Q. Did you keep them a secret?  
 22 A. Well, once I made that discovery, yes.  
 23 Q. Once you made what discovery?  
 24 A. The understanding of how to take mathematics,  
 25 if you will, and apply it in a practical sense to

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1 human behavior and thought.  
 2 Q. And about how old were you when you did that?  
 3 A. I don't know, 39 somewhere, whenever -- I had  
 4 just done that months before I met Nancy.  
 5 Q. You had just done what?  
 6 A. Made that discovery.  
 7 Q. What did you study at RPI?  
 8 A. I studied some mathematics, some physics,  
 9 some biology, some psychology, some philosophy, some  
 10 music, some computer programming, some language;  
 11 French.  
 12 Q. Were any of the concepts that you learned at  
 13 RPI used in Rational Inquiry?  
 14 A. No, not directly.  
 15 Q. What about indirectly?  
 16 A. Yeah. I think RPI is a unique rec -- RPI --  
 17 Rational Inquiry is a unique recipe of concepts that  
 18 exist plus things that were discovered as  
 19 combinations of those concepts.  
 20 Q. So some of the concepts were used in Rational  
 21 Inquiry?  
 22 A. No.  
 23 Q. Well, tell me again what you just told me.  
 24 A. Okay. It depends how you define "used in."  
 25 If you are -- I guess I would need you in

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1 part to define what you mean by "discovery" or "used  
 2 in."  
 3 I think that I learned to speak English and I  
 4 used that in Rational Inquiry; and English is used  
 5 in Rational Inquiry, but it's not Rational Inquiry  
 6 as a discovery. English is not confidential. So  
 7 like I use English, so I used things in mathematics,  
 8 things in philosophy, all of my background to bear  
 9 to create the discovery.  
 10 Q. Let me ask you to look at Paragraph 11 of  
 11 this Affidavit.  
 12 A. (Witness complies.)  
 13 Q. I'm going to read the first part of the  
 14 paragraph.  
 15 "I entered RPI just after my 17th birthday  
 16 and started to take high level (PhD) graduate  
 17 courses in Mathematics. These courses are normally  
 18 reserved for advanced graduate school students. To  
 19 my knowledge I was the first 17 year old to take  
 20 advanced 600 level mathematics courses in RPI's then  
 21 153 year history. I continued to develop Rational  
 22 Inquiry and formalized a new method of computer  
 23 programming which I called 'functional  
 24 programming."  
 25 A. Uh-huh.

1 Q. Did I read that correctly?  
2 Okay. You say, "I continued to develop  
3 Rational Inquiry."

4 A. Yes.

5 Q. What part of Rational Inquiry did you  
6 continue to develop?

7 A. I would say all of the precursor concepts. I  
8 gained a deeper and deeper understanding of this  
9 mode of thinking.

10 Q. When you say, "all of the precursor  
11 concepts," what precursor concepts are you referring  
12 to?

13 A. Well, in this particular case, the things  
14 relating to functional programming and information  
15 processing; how input variables, first of all, in a  
16 computer relate to output variables and how the  
17 computer uses a set of three operations which are  
18 addition, comparison, and iteration to solve all the  
19 problems. So you have a problem, and you have three  
20 operations, and that starts to raise the question  
21 can you create other operations to solve a problem  
22 set.

23 Q. Did you write -- well, did you tell anybody  
24 about your -- your thinking on this subject?

25 A. On functional programming, I imagine. I know

1 Q. "This successfully reduced our system's  
2 search time by over 90%. I thereby refined and  
3 tested my model of how the human mind, with sense  
4 capability, compared to a computer and how the human  
5 mind, equipped with a motivationally driven  
6 projective mechanism, 'understood' and strategically  
7 made decisions."

8 Did I read that correctly?

9 A. Yes, I believe so.

10 Q. When you say, "I thereby refined and tested  
11 my model," what model are you referring to?

12 A. Understanding of not only how the human mind  
13 creates templates but how to solve problems,  
14 human-created problems. In the Gammi-Pi physics  
15 group, we had a tremendous amount of data, and we  
16 had to fit a certain type of graph to that data.  
17 And although it's in a 12-parameter space, you can  
18 look at it on a screen as a two-dimensional  
19 visualization.

20 If the computer is searching -- if you were  
21 to imagine the space as a geometric object, it has  
22 all sorts of bumps and saddle points and things like  
23 that. A computer blindly looks in a systematic  
24 fashion. That systematic fashion is created by  
25 humans to go and find the optimal solution, but the

1 that I had actually written some functional  
2 programs.

3 Q. Did you -- did you keep those programs a  
4 secret?

5 A. No, the programs weren't kept a secret.

6 Q. What, if anything, was kept a secret?

7 A. My method of writing the programs. I worked  
8 for the Gammi-Pi physics group. We had a program  
9 that took 16 hours of CPU time to run and was  
10 something like 4,000 lines long. I wrote a  
11 functional program that took something like 6  
12 minutes and was 12 lines long.

13 Q. And that was written down?

14 A. The program was.

15 Q. So what you kept a secret was how it is that  
16 you reduced it down --

17 A. Can do such a thing.

18 Q. Moving to Paragraph 12 of this Affidavit.  
19 I'm starting about four lines down, "At this time I  
20 noted that a human could often 'see' a data pattern  
21 quicker than a computer. So I created a visually  
22 driven computer system to allow for 'human  
23 intervention' in optimal parameter selection and  
24 curve fitting."

25 A. Yes.

1 human can look at a graph and see almost instantly  
2 just like a chess player can do, can rival -- not so  
3 much any more -- a computer. A computer does 400  
4 million moves in a second. Computer -- a human mind  
5 can do four moves in a second, yet the human mind  
6 can work in these ways as well as a computer, so the  
7 question was why. And I started to understand that  
8 more and more by working on a programmatic basis and  
9 applying aspects of human perception to that  
10 programmatic basis.

11 Q. And all of that was part of your development  
12 of Rational Inquiry?

13 A. Part of the journey.

14 Q. Paragraph 13.

15 "From 1982 to 1984 I worked as a teacher of  
16 computer science and computer programming through  
17 Public Management Systems, a state contractor. I  
18 created the curriculum, taught classes and  
19 interviewed, evaluated, sub-contracted other  
20 instructors to teach classes with my curriculum and  
21 methodology in Manhattan, Albany, Saratoga and  
22 Poughkeepsie. I also worked as an independent  
23 computer and business consultant. It was during  
24 this time, as a teacher of science, I studied how  
25 humans processed problems and learned. I refined my

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1 learning and teaching methodology which I embodied  
 2 into a business plan called 'The Concept School'  
 3 later changed to 'The Life Learning Institute.'"  
 4 Did I read that correctly?  
 5 A. Yes.  
 6 Q. Okay.  
 7 A. I believe so.  
 8 Q. Is the -- is the business plan that's called  
 9 The Concept School and later changed to The Life  
 10 Learning Institute the foundation for Rational  
 11 Inquiry?  
 12 A. No.  
 13 Q. Is it the foundation for NXIVM?  
 14 A. No.  
 15 Q. How does it differ from Rational Inquiry?  
 16 A. It doesn't use the Rational Inquiry Method  
 17 at all. It was merely a way of delivering course  
 18 material that is for adult education in a way that  
 19 was more efficient. What it did was -- can I  
 20 explain this?  
 21 Q. Of course.  
 22 A. Okay, 'cause it's a little long. I'm sorry.  
 23 The Socratic method is a method of teaching  
 24 that hasn't undergone a lot of changes over, say,  
 25 the past few thousand years. When a teacher teaches

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1 the class, it is incumbent upon the teacher to be  
 2 able to get the information across somehow; and  
 3 there has been an art of teaching.  
 4 The way curriculum and one example that I  
 5 gave in the concept school -- let's suppose you were  
 6 learning calculus, and instead of offering Calculus  
 7 1 in ten sections all starting at the same time,  
 8 suppose we were to stagger them. So you could take  
 9 Lecture 1, and you could take Lecture 1 again if you  
 10 missed it, and you could take Lecture 1 again and  
 11 then 2 and maybe go to 3, 4. And then if you had  
 12 trouble in 4, you could go to 4, back to 3.  
 13 This would allow you an ability to not worry  
 14 about -- so much about I must learn the material  
 15 here. If I'm stuck on this material, I can take the  
 16 course again. And from the teacher's perspective,  
 17 the teacher always has to teach to the bottom 20  
 18 percent of the class; and if the bottom 20 percent  
 19 of the class can always take the course again, the  
 20 teacher can actually teach in a more accelerated  
 21 fashion. So by allowing students the liberty to go  
 22 and take courses in a different organized fashion,  
 23 they can go and repeat things and learn better and  
 24 the teachers could also learn better. Additionally,  
 25 to teach -- to be -- to know the information well

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1 doesn't necessarily mean you're a good teacher. In  
 2 part, teaching is entertainment, if you will,  
 3 keeping the students' attention, enrolling,  
 4 inspiring the students' interest in the subject.  
 5 I know you hear often that people have been  
 6 inspired by great teachers. So the question is,  
 7 well, if you were to take teachers and instead of  
 8 just hiring them because they knew the subject, look  
 9 to see who could offer curriculum and lecture after  
 10 lecture keep it entertaining, more like someone who  
 11 had the ability to act or entertain. And if you  
 12 combined it with a different way of scheduling the  
 13 courses, you could provide a unique adult education  
 14 program.  
 15 Q. Is there any difference between The Concept  
 16 School and The Life Learning Institute?  
 17 A. No, just a difference in I think one person  
 18 that was involved, but it was a better name. People  
 19 liked the name better, Life Learning Institute.  
 20 Q. How many business plans did you prepare for  
 21 the Concept School?  
 22 A. One.  
 23 Q. And what did you do with the plan?  
 24 A. Showed to it some investors.  
 25 Q. Paragraph 17 you say, "I explored what I

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1 termed different types of learning: For example,  
 2 you can't really learn to ski out of a book; you  
 3 can't replace physical or experiential learning with  
 4 intellectual learning. Motivation had a strong  
 5 experiential learning component and I developed  
 6 tools to teach it."  
 7 A. Uh-huh.  
 8 Q. Did I read that correctly?  
 9 A. Yes, I believe so.  
 10 Q. What is the "it" in the last sentence? "I  
 11 developed tools to teach it"?  
 12 A. The experiential learning component of  
 13 motivation. I started to understand that and  
 14 developed tools to help isolate it and help teach  
 15 it.  
 16 Q. And are those tools components of the  
 17 Rational Inquiry Method?  
 18 A. They're precursors.  
 19 Q. Did you publish them in any way?  
 20 A. No.  
 21 Q. Did you tell anyone about them?  
 22 A. No, not directly. I have taught people, for  
 23 example, to be -- to do certain things that help in  
 24 motivation. For example, as silly as it sounds, if  
 25 someone wants to have a certain state and it's tied

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1 to a certain musical piece, playing that piece can  
 2 allow through state dependent learning to increase  
 3 that motivation. But the question has always been  
 4 when someone does an activity what is the motivator  
 5 underneath it and how do you harness that  
 6 motivation. So I've taught -- I've told people  
 7 things like that but nothing relating to the  
 8 Rational Inquiry Method there.  
 9 Q. Well, when you -- when you told people things  
 10 like that, did they sign a confidentiality  
 11 agreement?  
 12 A. Actually, most of them did, I believe, if  
 13 not all; but I don't consider that part of the  
 14 Rational Inquiry Method.  
 15 Q. Why not?  
 16 A. Well, 'cause it's a precursor to it. It led  
 17 to the discovery and it led to this tool set that we  
 18 call Rational Inquiry today. It was not that tool  
 19 set, similar to if I'm starting to learn about tools  
 20 and I have a hammer and I have a saw and I have a  
 21 chisel, and one day I discover the screwdriver. I  
 22 cannot say that the hammer, the saw and the chisel  
 23 are the screwdriver. It did lead to its discovery,  
 24 but the screwdriver has unique traits.  
 25 Q. Does it provide a window to the hammer and

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1 the chisel?  
 2 A. It can, but if they are precursors, as  
 3 opposed to once the discovery exists actually  
 4 viewing the discovery.  
 5 Q. How do you define precursor?  
 6 A. Something that comes before.  
 7 Q. In the context that you're using it, what are  
 8 the precursors to the Rational Inquiry Method?  
 9 A. Understandings of human emotion,  
 10 understandings of human motivation, understandings  
 11 in mathematics, how mathematics relates to human  
 12 thoughts.  
 13 Q. What was Consumers' Buyline?  
 14 A. Consumers' Buyline was a company that I was  
 15 the primary owner of and CEO.  
 16 Q. What did it do?  
 17 A. It did severalfold. It was what some people  
 18 termed a multi-level marketing company where people  
 19 had an opportunity to have home-based businesses and  
 20 sell a product. On the other hand, the product was  
 21 a membership. By bringing a coalition of people  
 22 together, and in this case quite a large coalition,  
 23 we were able to negotiate discount buying  
 24 opportunities so it was sort of the -- what a lot of  
 25 people can do now online and even what people know

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1 as price clubs, this was similar, but it was a 1800  
 2 number membership.  
 3 Q. What did it sell?  
 4 A. Well, Consumers' Buyline was a membership and  
 5 through it you were able to get -- it was over a  
 6 million products. It was almost every book in  
 7 print, it was electronics, circuits. You were able  
 8 to get groceries delivered to your door. We had a  
 9 grocery catalog that came out every two months. We  
 10 had special deals on things like luggage and things  
 11 like cassette tape recorders or the cassettes that  
 12 go in.  
 13 We had a special company called Direct  
 14 Buyline, which was a subsidiary which went to  
 15 manufacturers and got special either crate deals or  
 16 large discount deals which we passed on to our  
 17 members at no additional cost. So what Consumers'  
 18 Buyline was like was the Consumer Reports -- it's as  
 19 if you had Consumer Reports but was also offered the  
 20 ability to buy the object at the price stated with  
 21 the lowest price guarantee.  
 22 Q. Did -- did your experience with Consumers'  
 23 Buyline influence your development of Rational  
 24 Inquiry and NXIVM?  
 25 A. I'm sure.

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1 Q. How?  
 2 A. I had contact with many people in many  
 3 different contexts as a head of a large marketing  
 4 organization, as a CEO of a company with many  
 5 employees. For example, as a CEO of the company, I  
 6 had some almost 200 employees. The question is what  
 7 can you do to make their work meaningful. What can  
 8 you do to make the company serve the employees and  
 9 foster a type of community as much as possible.  
 10 I also had a lot of opportunity to help  
 11 resolve ethical disputes amongst marketers and  
 12 amongst different people like that.  
 13 Q. So what -- what parts of your development of  
 14 Rational Inquiry came from Consumers' Buyline?  
 15 A. I would say it probably furthered a lot of my  
 16 understanding. I learned a lot about ethics. I  
 17 learned a lot about business. I learned a lot about  
 18 motivation of why people do things or not. I think  
 19 all of my understandings on those levels were  
 20 furthered by this experience.  
 21 Q. And are all of those understandings part of  
 22 the Rational Inquiry Method?  
 23 A. No. They lead up to the Rational Inquiry  
 24 Method.  
 25 Q. How were --

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1 A. They were necessary for me to create the  
2 Rational Inquiry Method.  
3 Q. Let me ask you to turn to Paragraphs 25 and  
4 26.  
5 A. (Witness complies.)  
6 Q. Let me read them into the record, and then I  
7 have several questions about them.  
8 Paragraph 25 says, "In Mathematics, all  
9 things are proven based on axioms and a step by step  
10 systematic construction. Computers work the same  
11 way. To program a computer one must first  
12 understand the axioms of the computer language, and  
13 then the step by step systematic construction of the  
14 problem-solution methodology. Finally, one must  
15 construct the problem-solution methodology in a  
16 step by step fashion using the axioms of the  
17 language. I discovered the human mind works the  
18 same way and I formalized the process."  
19 "This process involved treating each word or  
20 part in a communication as a mathematical set. As  
21 such, the operations of set theory and Boolean logic  
22 could be utilized. Each word is seen as both a  
23 general objective representation and a highly  
24 specific subjective representation."  
25 A. Uh-huh.

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1 Q. "By precisely choosing exact words in precise  
2 orders one could communicate in a far deeper and  
3 measurable way. And, similar to mathematical  
4 proofs, the precise questions and their order are of  
5 ultimate importance. In some ways it is similar to  
6 saying a person cannot walk before they crawl -- the  
7 order is essential."  
8 A. Yes.  
9 Q. Did I read all that correctly?  
10 A. Yes.  
11 Q. Is -- are the ideas that you are expressing  
12 in Paragraphs 25 and 26 the basis or foundation of  
13 Rational Inquiry?  
14 A. Getting closer.  
15 Q. Are they the basis of NXIVM?  
16 A. I think NXIVM has developed not only beyond  
17 that but is different than Rational Inquiry.  
18 Q. How is NXIVM different from Rational Inquiry?  
19 A. NXIVM is a company. Rational Inquiry is a  
20 method, if I were to describe it that way. NXIVM  
21 has a lot of components that are not Rational  
22 Inquiry.  
23 Q. Well, referring to the courses that NXIVM  
24 teaches, how -- how does Rational Inquiry differ  
25 from the coursework at NXIVM?

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1 A. Some of the coursework is a product of  
2 Rational Inquiry.  
3 Q. Is there some coursework at NXIVM that is not  
4 a product of Rational Inquiry?  
5 A. I think there are de -- I think there are a  
6 few sections that are defined as such.  
7 Q. When you say they're defined as such, defined  
8 as such by whom?  
9 A. Within the module I believe it states where  
10 they came from.  
11 Q. And that they came from something other than  
12 Rational Inquiry?  
13 A. Yeah. I believe there's a Birdwhistle  
14 (phon.) Or whatever the person's name is that did a  
15 study and a few things like that.  
16 Q. Well, what modules are taught by NXIVM that  
17 are not based on Rational Inquiry?  
18 A. Communication/At Cause has certain parts of  
19 it that have been taken -- that are based not on  
20 Rational Inquiry but utilizing Rational Inquiry have  
21 been enhanced.  
22 Q. But they utilize Rational Inquiry?  
23 A. Yes.  
24 Q. You testified yesterday that the Rational  
25 Inquiry Method is a tool. It's theoretical

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1 procedures involved in the creation of certain  
2 results. Do I have that right?  
3 A. Say the last few -- the last sentence again.  
4 Q. That it's theoretical procedures involved in  
5 the creation of certain results.  
6 A. Yes.  
7 Q. And you told us that the results include  
8 the ordering of questions and the ordering of  
9 philosophical concepts, is that right?  
10 A. Uh-huh. Yes.  
11 Q. You also testified that creating the  
12 questions in a module is like assembling the pieces  
13 of a puzzle, and the questions can only be  
14 interlocked in a certain way.  
15 Do I have that right?  
16 A. To a great extent. In other words, often  
17 they can be interlocked in only one way; but there  
18 are limitations as to how the different questions  
19 and words can be interlocked.  
20 Q. Okay, and -- and is it true that you believe  
21 that the nature of that organization is a NXIVM  
22 trade secret?  
23 A. The nature of how that organization is  
24 derived.  
25 Q. Is a trade secret?

1 A. Yes.

2 Q. Okay. Do -- do the Martin or Hochman

3 articles reveal or disclose the ordering of

4 questions?

5 A. I believe it does, especially the Martin

6 article.

7 Q. How does it do that?

8 A. Well, the products of Rational Inquiry can

9 also be used to determine Rational Inquiry much like

10 a -- a footprint in a sand can be used to figure out

11 what the footprint is. The questions themselves,

12 the order of the words may not be -- they are a

13 product of Rational Inquiry, but utilizing those

14 things people can deduce Rational Inquiry, possibly

15 recreate many of the trade secrets of Rational

16 Inquiry.

17 Q. So, once again, is it -- is it fair to say

18 that the articles themselves don't disclose the

19 actual ordering of questions in print but that you

20 think that someone might be able to infer the

21 ordering of questions based upon the things that the

22 articles do say?

23 A. No. The articles do disclose the ordering of

24 questions.

25 Q. What questions -- what ordering -- what

1 (A discussion was held off the record.)

2 A. Do you want me to read these articles start

3 to finish and --

4 Q. Well, you've read them pretty closely in the

5 last couple of days. I want you to try to tell me

6 where you think the articles disclose the ordering

7 of philosophical concepts.

8 A. Okay. I will say that when you say "disclose

9 the ordering," there's one thing to directly

10 disclose it, which I believe they do. There is also

11 indirectly disclose it, which are ways I may not be

12 able to contemplate sitting here reading it because

13 for some --

14 Q. Let's -- I'm sorry.

15 A. -- for someone who is motivated to solve the

16 problem of finding it out they well could by this

17 disclosure.

18 Q. Let's focus on direct disclosure.

19 A. Okay.

20 Q. Which one are you looking at first?

21 A. Raniere-8, A Critical Analysis of Executive

22 Success Programs.

23 So on the first article, without going into a

24 lot of detail, there are things referenced with page

25 numbers in the module -- the manual and dates. And

1 questions are disclosed?

2 A. I believe in the Money module, the order of

3 concepts and questions, projective questions which

4 is not as order dependent but were dependent within

5 the order. I believe those things were quoted.

6 Q. Anything else?

7 A. Most of the quoted stuff that has questions

8 involved and even some of the stuff that does not.

9 Q. Do -- do the Martin and Hochman articles

10 reveal or disclose the ordering of philosophical

11 concepts?

12 A. I believe so.

13 Q. How?

14 A. In the Money module I believe it specifically

15 diagrams out the different concepts addressed and

16 the order.

17 Q. The Money module again?

18 A. I -- I think some of the others, I believe

19 also.

20 Q. You want to -- you want to look at the

21 articles and tell me what else you think discloses

22 the ordering of philosophical concepts?

23 A. Okay. Can you -- what are they?

24 Q. I think they are 5, 6 and 8.

25 A. 5, 6 and 8.

1 whenever you're copying parts of a manual and

2 putting them in, if you start to put the page

3 references of where the paragraphs came from, you

4 start to say what the order of the manual is.

5 I also know that in some of these things

6 the modules are specifically not only referenced,

7 but their order within a series is referenced. I

8 can continue to get more direct examples, but there

9 are.

10 Q. Well, tell me what you mean by the order is

11 referenced.

12 A. Okay. For example --

13 MR. McGUIRE: We're talking about what

14 now?

15 A. -- if you go to Raniere-6.

16 MR. McGUIRE: 6.

17 Q. Oh, we've moved to Raniere-6? I thought you

18 were starting with Raniere-8.

19 A. I did. Do you want me to go to Raniere-8

20 first?

21 Q. No, I just wanted to know which one you were

22 talking about.

23 A. Okay. Raniere-6 because I think it's

24 clearer. I'd would be a bad driver. I shift

25 everything around.

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1 On the first page it says "Phone tree," and  
 2 it says 12/2000, which is the Intensive manual it  
 3 comes from, Page 4.  
 4 And the next page at the very top it says, "I  
 5 will not speak of them, or in any way give others  
 6 knowledge of them."  
 7 That's 12 Point Mission Statement 4th Comment  
 8 -- 4th Point of 12 points.  
 9 Next paragraph, "Arranging for Coaching  
 10 Support" in quotes. It goes through specifically  
 11 quoting the order of the different steps.  
 12 And then it is Page 1, Number 2.  
 13 Now, the next is it has the Money module. It  
 14 says "Concepts presented," and it specifically  
 15 delineates eight concepts in order and says this is  
 16 Page 2, Number 3 from the Money module.  
 17 Similar things like this.  
 18 Q. Well, let me ask you this. You referred to  
 19 the Phone tree, and you said "12/2000" refers to the  
 20 Intensive manual.  
 21 The article doesn't say that it refers to the  
 22 Intensive manual, does it?  
 23 A. The other article does.  
 24 Q. No, I'm talking about this article.  
 25 A. Oh. No, this article does not. I don't

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1 believe it does. It might in the back.  
 2 Q. And it doesn't tell you what was on Pages 3  
 3 or Pages 5, does it?  
 4 A. Hold on a second. Let me see if it -- I  
 5 don't think he put a Bibliography on this article.  
 6 Right now I don't see this as saying what's  
 7 on 3 -- Page 3 or Page 5, that is correct.  
 8 Q. And the reference to the 12 Point Mission  
 9 Statement, there's nothing that tells you what  
 10 Points 1, 2, 3 or 5 are. It's just this is Point 4,  
 11 right?  
 12 A. In this particular context, yes, but I  
 13 believe he -- out of the 12 points, I think he  
 14 recopies 7 of them.  
 15 Q. Okay. But this doesn't tell you also where  
 16 the 12 Point Mission Statement fits in relation to  
 17 the Intensive manual or to Rules and Regulations,  
 18 does it?  
 19 A. No. That's seemingly correct, yes.  
 20 Q. All right. You want to direct me to -- oh,  
 21 and one other -- one other point.  
 22 The specifications under "Arranging for  
 23 Coaching Support" --  
 24 A. Which page? I'm sorry.  
 25 Q. Second page.

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1 A. Yes.  
 2 Q. Do you consider those philosophical concepts?  
 3 A. Well, let me read them.  
 4 MR. McGUIRE: Where are you, Peter?  
 5 MR. SKOLNIK: I'm on Page -- the second  
 6 page of Raniere-6, "Arranging for Coaching Support."  
 7 MR. McGUIRE: Thank you.  
 8 Continuing...  
 9 A. I think they represent certain things that  
 10 are philosophical concepts in Word. I don't think  
 11 -- how would you define something representing a  
 12 philosophical concept in Word?  
 13 Q. Well, happily, I'm not answering questions  
 14 today. I'm not sure that I understand your  
 15 question, but, anyway --  
 16 A. Well, I misunderstood your question maybe.  
 17 Q. Let me -- let me ask you a different question  
 18 about the articles.  
 19 Do the articles disclose how to apply the  
 20 tool of the Rational Inquiry Method to create  
 21 certain results?  
 22 A. I think they might indirectly.  
 23 Q. Indirectly?  
 24 A. Yeah, and might directly, depending on how  
 25 well they were studied.

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1 Q. Well, what do you mean that whether or not  
 2 they do so directly depends upon how well they're  
 3 studied? Either they do so directly or they don't.  
 4 A. Well, if I look at, for example, a murder  
 5 mystery and I --  
 6 Q. Can you talk about the articles?  
 7 MR. McGUIRE: Well, why don't you let  
 8 him finish the answer.  
 9 MR. SKOLNIK: Because he's not being  
 10 responsive to the question.  
 11 MR. McGUIRE: That is -- you wait until  
 12 the end of the answer, not during the answer.  
 13 MR. CAMPION: Okay. Could you have the  
 14 question repeated, please.  
 15 (The following was read back by the  
 16 reporter:  
 17 "Can you talk about the articles?")  
 18 THE REPORTER: Did you want me to read  
 19 further back?  
 20 MR. CAMPION: That's the question.  
 21 Okay. You can answer the question.  
 22 Continuing...  
 23 A. What do you want me to say about the  
 24 articles?  
 25 Q. How they disclose directly the ways in which

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1 the tools create certain results.  
2 A. Well, depending on the level of depth  
3 with which you read an article, we all have  
4 different understandings. A person that reads an  
5 article who is maybe not as well versed, maybe not a  
6 competitor, maybe not as intelligent, maybe not as  
7 good a reader will gather certain information from  
8 the article. Someone who has deeper compl --  
9 comprehension will gather more and even on a deeper  
10 level will gather logical implications that are  
11 absolute within the article. And what I was saying  
12 before, you can see a murder mystery and although  
13 the murder mystery doesn't say who did it, the  
14 murder mystery implies absolutely who did it so  
15 that's -- those fall in class of direct.  
16 Q. Was that sentence finished?  
17 A. Yes. I'm sorry. Those fall in the class of  
18 direct, if you will, ascertaining or transmission of  
19 the information.  
20 Q. In Paragraphs 25 and 26 that we just looked  
21 at, you described the process of programming a  
22 computer.  
23 A. Is this Ranieri-11?  
24 Q. Yes.  
25 A. Okay.

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1 Q. You described the process of programming a  
2 computer. You state that the human mind works the  
3 same way as a computer, and you claim that you  
4 formalized the process; is that right?  
5 A. Uh-huh.  
6 Q. So Rational Inquiry as practiced by NXIVM is  
7 a process for programming the human mind?  
8 A. That's part. You -- you can call it  
9 programming, deprogramming, yes.  
10 Q. So NXIVM programs its students?  
11 A. To a degree, yes.  
12 Q. Paragraph 27, "My new found mode of  
13 communication, when added to my projective model,  
14 allowed a person to understand others on a far  
15 deeper level. It enabled a person to find a common  
16 understanding with others and to logically build a  
17 belief system that matched a person's subjective  
18 world -- highly individual yet consistent. Using  
19 this model people seemed to understand themselves  
20 and each other better. They understood their  
21 decisions and in so doing often derived a sense of  
22 self-determinism. In short, their motivation was  
23 redirected from fear generated to objective  
24 generated. Over the next 7 years I would interview  
25 hundreds of people before I found the correct person

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1 to duplicate and teach my model."  
2 Did I read that correctly?  
3 A. I believe so.  
4 Q. The model that you're referring to when you  
5 say I interviewed hundreds of people before I found  
6 the right person to duplicate and teach my model,  
7 what model were you referring to?  
8 A. That was the beginnings of Rational Inquiry.  
9 I think even some of the trade secrets that now  
10 exist a few of them might have been developed at  
11 that time.  
12 Q. And did you discuss those trade secrets with  
13 some of these hundreds of people that you  
14 interviewed?  
15 A. Absolutely not.  
16 Q. Who were some of the people that you  
17 interviewed?  
18 A. People that I had come in contact with  
19 through a company called National Health Outlet,  
20 even people I had come in contact with through  
21 Consumers' Buyline, different people who I knew not  
22 only who were friends but who were different  
23 professionals.  
24 Q. And you were interviewing these people  
25 specifically to find someone to duplicate and teach

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1 your model?  
2 A. To teach my model to, yes, and then to see if  
3 it was something that was duplicatable.  
4 Q. And you were trying to find someone to whom  
5 you could teach your model and have it be duplicated  
6 without talking about your model, is that correct?  
7 A. Yes.  
8 Q. Who was the correct person?  
9 A. Nancy Salzman.  
10 Q. Paragraph 28 -- well, let me go back for a  
11 minute.  
12 What convinced you that Nancy Salzman was the  
13 correct person?  
14 A. Not only her background and her experience,  
15 but I spent a number of days meeting with her. We  
16 were going to meet for an hour. I don't know how  
17 long it was. We met many hours several days in a  
18 row, and I believed that she had not only the  
19 background but the personality and what I believe  
20 the value set to do this and also a willingness.  
21 Q. What was the value set that you were looking  
22 for?  
23 A. I believe she was honest. I believe she was  
24 hardworking.  
25 Q. Anything else?

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1 A. Someone that I felt comfortable with.  
 2 Q. Paragraph 28 reads in part, "In 1991, a paper  
 3 I wrote was circulated throughout my industry. It  
 4 utilized axiomatic first principles and a logical  
 5 proof framework to 'debunk' many of the practices  
 6 within the industry."  
 7 A. Uh-huh.  
 8 Q. I read that correctly?  
 9 A. I believe so.  
 10 Q. What was the name of the paper you wrote?  
 11 A. I remembered yesterday as I was saying this,  
 12 I believe it was referred to informally as the White  
 13 Paper.  
 14 Q. And how was it circulated?  
 15 A. Some marketers ended up copying it and  
 16 circulating it.  
 17 Q. What ideas did the paper include?  
 18 A. Relating to multi-level marketing, the  
 19 fallacies of multi-level marketing, and a type of  
 20 lay analysis of different marketing materials,  
 21 pyramid schemes. I think it even went on to explain  
 22 the nature of a pyramid scheme of effort, Ponzi  
 23 schemes, although I'm not sure if those were  
 24 included in the initial White Paper.  
 25 THE VIDEOGRAPHER: Excuse me. We have

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1 to change tapes.  
 2 We're back on the record. The time is  
 3 5:17.  
 4 BY MR. SKOLNIK:  
 5 Q. Were you in the middle of an answer?  
 6 A. I'm not sure.  
 7 MR. SKOLNIK: Can you read back the last  
 8 testimony?  
 9 MR. MCGUIRE: Read the question, too, so  
 10 we'll know. Read the question, also.  
 11 (The following was read back by the  
 12 reporter:  
 13 "QUESTION: What ideas did the paper  
 14 include?  
 15 ANSWER: Relating to multi-level  
 16 marketing, the fallacies of multi-level marketing,  
 17 and a type of lay analysis of different marketing  
 18 materials, pyramid schemes. I think it even went on  
 19 to explain the nature of a pyramid scheme of effort,  
 20 Ponzi schemes, although I'm not sure if those were  
 21 included in the initial White Paper."  
 22 A. That's the --  
 23 Q. Was that it?  
 24 A. Yes.  
 25 Q. Was the paper -- withdrawn.

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1 Did any part of the paper talk about your  
 2 model?  
 3 A. No.  
 4 Q. Did any part of the paper contain any aspects  
 5 of the Rational Inquiry Method?  
 6 A. No.  
 7 Q. Have a look at Paragraphs 36 and 37.  
 8 A. (Witness complies.)  
 9 Q. Paragraph 36 says, "The first most  
 10 fundamental step in creating a company is the  
 11 precise determination of the guiding principles on  
 12 which it is built -- a mission statement.  
 13 Everything must be based on and flow from this  
 14 ethic. For our success school, I felt it was  
 15 necessary to start with a philosophical statement  
 16 of what success is (point 1 of the 12 point Mission  
 17 Statement) then have the rest of the Mission  
 18 Statement follow from there."  
 19 "I searched my life experience and wrote the  
 20 copyrighted 12 point Mission Statement that was the  
 21 basis of our company, technology and education.  
 22 When someone signs up for a program, they sign a  
 23 confidentiality agreement. The first module they  
 24 take is 'Rules and Rituals.' Within this module  
 25 they learn of the 12 point Mission Statement. At

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1 that point, if they find any of the premises  
 2 disagreeable, they can have their money refunded  
 3 without further obligation except for the terms of  
 4 the confidentiality agreement."  
 5 Did I read that correctly?  
 6 A. There is a parenthetic expression on the end  
 7 of Clause 36 that says in my copy, "(See Appendix D  
 8 for protective procedures)."  
 9 Is that on yours?  
 10 Q. Yes, it is but I'm not -- I'm not reading.  
 11 A. No. I just wanted to be sure that it was  
 12 accurate.  
 13 Q. But other than that, I read it correctly?  
 14 A. I believe so.  
 15 Q. All right. And I think you've already told  
 16 us that you consider the 12 Point Mission Statement  
 17 to be a trade secret, is that right?  
 18 A. I don't know if I said that.  
 19 Q. Well, do you consider the 12 Point Mission  
 20 Statement to be a trade secret?  
 21 A. I think that it contains windows into trade  
 22 secrets. I don't know if any written expression  
 23 except for even maybe a formula -- I don't know  
 24 enough about trade secrets. I do consider it  
 25 secret. I do consider it essential.

1 Q. Well, using -- using your definition of trade  
2 secret, the one that -- the one that you gave us  
3 yesterday. We were -- we were working with your  
4 definition of trade secret yesterday, and I want to  
5 be sure we're talking about the same thing today.

6 I believe you told us that a trade secret is  
7 something we believe is unique that we keep as a  
8 secret and if it were not kept secret would be a  
9 disadvantage to us.

10 A. I believe --

11 Q. Do I have that right?

12 A. I believe the Mission Statement falls into  
13 that.

14 Q. Okay. Was the development of the 12 Point  
15 Mission Statement the most fundamental step in  
16 creating ESP and NXIVM?

17 A. The most fundamental?

18 Q. Well, in Paragraph 36 you say, "The first  
19 most fundamental step in creating a company."

20 A. Right. That doesn't mean it's the most  
21 fundamental, but when you're taking first steps, the  
22 first most fundamental step -- I don't know if it's  
23 the most fundamental thing of all, but it's  
24 certainly very fundamental.

25 Q. Okay. Is -- is everything in NXIVM based on

1 trade secrets which have been derived after the  
2 point of the Mission Statement.

3 Q. Okay. But referring just to the 12 Point  
4 Mission Statement --

5 A. Uh-huh.

6 Q. -- would you agree that if the 12 Point  
7 Mission Statement was posted on NXIVM's website,  
8 then it as written is not a trade secret?

9 A. Well, it's not secret in the same way if it  
10 was downloaded by anyone, I imagine.

11 Q. Let me ask you again.

12 A. All right. I'm being specific because when  
13 you post something on the web, if nobody looks at  
14 it, it hasn't been downloaded. It hasn't been  
15 viewed so -- but if it was posted on the web and if  
16 it indeed was downloaded, then that becomes some  
17 form of more public knowledge.

18 Q. If it was downloaded or even if it was just  
19 viewed, is that right?

20 A. Well, but what I mean by -- to view it -- in  
21 my mind, to view it means you've taken the package  
22 from the website and put it on your computer. I'm  
23 sorry.

24 Q. And you testified yesterday that you don't  
25 know of any other modules that have been posted on

1 the 12 Point Mission Statement?

2 A. No.

3 Q. Well, what do you mean in Paragraph 36 when  
4 you say, "Everything must be based on and flow from  
5 this ethic"?

6 A. It flows from this ethic. Depending on how  
7 you define "based on" --

8 Q. Well, it's your word, Mr. Ranieri.

9 A. I understand. As far as what I am saying  
10 here is that this is the foundational principle and  
11 principles from which everything else is ultimately  
12 derived. So, yes, I guess in answer to your  
13 question, in some way, shape or form all ESP, NXIVM  
14 flows from this.

15 Q. Now, you told us yesterday that you  
16 understood that the 12 Point Mission Statement may,  
17 in fact, have been posted on NXIVM's website; right?

18 A. Uh-huh.

19 Q. And you testified that if it appeared on the  
20 website you would acknowledge that it's not a trade  
21 secret, right?

22 A. That part of it.

23 Q. Well, if all of it appeared on the website --

24 A. Yes, but where -- it in itself, but there are  
25 also the trade secrets which it implies and the

1 the internet.

2 A. Correct.

3 Q. But would you make the same acknowledgement  
4 about any other NXIVM material that NXIVM or its  
5 representatives posted on the internet?

6 A. Yeah. If people can publicly access them,  
7 they've lost certainly a degree of secrecy.

8 Q. Okay. Would you acknowledge that you don't  
9 believe that NXIVM can claim trade secret status for  
10 any NXIVM materials that it has made available to  
11 the public through its own actions?

12 A. Maybe the materials. There is a difference  
13 between NXIVM's trade secrets which generate the  
14 materials and the materials themselves. If the  
15 materials embody specifics of a trade secret, then  
16 that is true. It is now sort of the cat is out of  
17 the bag.

18 MR. SKOLNIK: Can I hear that answer  
19 back?

20 (The following was read back by the  
21 reporter:

22 "ANSWER: Maybe the materials. There is  
23 a difference between NXIVM's trade secrets which  
24 generate the materials and the materials themselves.  
25 If the materials embody specifics of a trade secret,

1 then that is true. It is now sort of the cat is out  
 2 of the bag.")  
 3 BY MR. SKOLNIK:  
 4 Q. What research did you do to come up with the  
 5 12 Point Mission Statement?  
 6 A. I imagine in one sense it's my life. That's  
 7 an expression of what my experience was. I don't  
 8 know exactly I guess what you mean by research.  
 9 Q. Well, did you conduct any research  
 10 specifically aimed at creating a 12 Point Mission  
 11 Statement?  
 12 A. No, not a 12 Point Mission Statement.  
 13 Q. Which points of the 12 points did you come up  
 14 with first?  
 15 A. Um, I'm not sure.  
 16 Q. Did you create any early drafts of the 12  
 17 Point Mission Statement?  
 18 A. I don't believe so.  
 19 Q. So you sat down to write it, and it was just  
 20 one draft?  
 21 A. Yes.  
 22 Q. Paragraph 38 says, "As part of the  
 23 curriculum, students recite this 12 point Mission  
 24 Statement before class and reflect upon its  
 25 contents. The whole curriculum is based on this

1 on the 12 point Mission Statement: Using the model  
 2 I had discovered, we codified the subject matter  
 3 into twenty 2 hour modules and refined the wording  
 4 and order of each question."  
 5 A. Uh-huh.  
 6 Q. Did I read that correctly?  
 7 A. Yes.  
 8 Q. Can you recall sitting here today what this  
 9 list of the first group of 20 modules was?  
 10 A. Not completely. I can probably run off some  
 11 of them.  
 12 Q. Tell me what you remember.  
 13 A. Um, well, there's Rules and Rituals. There's  
 14 I believe it's Communication/At Cause, Honesty and  
 15 Disclosure, there's Work and Value, there's  
 16 Self-Esteem, there's Good and Bad, there is Excited  
 17 State, there is Persistency and Motivational State,  
 18 there is Intensity and Power State, there's Time and  
 19 Lists. I don't know if I mentioned Parasite Module  
 20 I and Parasite II and Parasite Practice, which is  
 21 Parasite III. There's a Tribute module. There is a  
 22 Money module. There's a Crime and Punishment  
 23 module.  
 24 Those are -- I mean, those are the ones that  
 25 come up off the top of my head. I think I listed

1 12 point Mission Statement and as students learn and  
 2 experience more, it is our hope they will gain a  
 3 deeper and deeper understanding of these tenets."  
 4 Did I read that correctly?  
 5 A. I believe so.  
 6 Q. What does it mean that the whole curriculum  
 7 is based on the 12 point Mission Statement?  
 8 A. It means that if you understand the 12 point  
 9 Mission Statement deep enough, that at this point in  
 10 time, one would gain a better understanding on the  
 11 whole -- of the whole curriculum, that they reflect  
 12 each other; and the 12 point Mission Statement is  
 13 something that helps in gaining a deeper  
 14 understanding of the curriculum.  
 15 Q. Is -- is the 12 point Mission Statement the  
 16 most important of NXIVM's trade secrets?  
 17 A. I -- no.  
 18 Q. What --  
 19 A. Not at all.  
 20 Q. What trade secrets do you consider more  
 21 important than the 12 point Mission Statement?  
 22 A. The Rational Inquiry Method and all trade  
 23 secrets relating directly to that.  
 24 Q. Paragraph 39 you say, "For the next several  
 25 months, we continued to refine the curriculum based

1 like 16 of them.  
 2 Q. You say in Paragraph 39, "We continued to  
 3 refine the curriculum."  
 4 Who is the "we"?  
 5 A. Nancy, myself.  
 6 Q. Anyone else?  
 7 A. Not that I can think of. I -- it's my belief  
 8 that I learn from the people around me, from  
 9 students taking classes and things like that, so  
 10 although they are not involved in the refinement of  
 11 the curriculum, what I learn from them and the data  
 12 that I gather helps me. So Nancy and I are the  
 13 people that refine the curriculum, but the students  
 14 provide data to some degree.  
 15 Q. And when you say in Paragraph 39, "using the  
 16 model I had discovered," is the model you discovered  
 17 the Rational Inquiry Method?  
 18 A. I think it is a basis for the Rational  
 19 Inquiry Method. It is one of the foundational  
 20 things. That model has been developed and has grown  
 21 over the years.  
 22 Q. Were all 20 of the original modules based on  
 23 the Rational Inquiry Method?  
 24 A. The original 20 modules were either products  
 25 of or based on the Rational Inquiry Method.

1 MR. SKOLNIK: Okay. I'm going into a  
2 whole new line of questioning now, and if we are not  
3 going to -- well, we're not going to finish today  
4 so I think we should stop for the day; and as I  
5 suggested earlier, I think that we should while  
6 we're all here agree upon a date to resume this  
7 deposition if Judge Falk so orders it.

8 MR. CAMPION: We are disposed to  
9 continuing until 7:00 this evening after a short  
10 recess now and resuming tomorrow morning at 9:30.  
11 That would take care of the question of checking  
12 everybody's calendar and continue until 1:00  
13 tomorrow if that is necessary.

14 MR. SKOLNIK: I cannot be here tomorrow.

15 MR. KOFMAN: I'm unavailable. This was  
16 only noticed for a single -- for these two days.

17 MR. CAMPION: Well, the offer is there.  
18 I have to accommodate my schedule to do this. I  
19 believe McGuire --

20 MR. McGUIRE: So do I.

21 MR. CAMPION: -- has to do the same  
22 thing. We are prepared to do so.

23 So I do want to be sure that we've made  
24 a record of the same, and I throw one other factor  
25 out which I think is a practical factor.

1 MR. CAMPION: Okay. Then I gather this  
2 will end up as the subject of some motion then. We  
3 have accommodated your request that we have our  
4 calendars available, and we've told you we're  
5 available tomorrow.

6 MR. SKOLNIK: Okay. Let me -- let me  
7 consult with my co-counsel.

8 MR. CAMPION: In any event, let's all  
9 take five minutes, anyway.

10 (At this point, there was a short  
11 recess.)

12 THE VIDEOGRAPHER: We're back on the  
13 record at 5:44.

14 MR. SKOLNIK: We're going to adjourn the  
15 deposition for the day. While I appreciate your  
16 offer, it's been a long day today. Yesterday was  
17 broken by the couple of hours that we spent in  
18 settlement discussions, and there is no way that I  
19 can finish my questioning today. And,  
20 unfortunately, neither I nor Mr. Kofman nor  
21 Mr. Landy are available to resume the deposition  
22 tomorrow morning so we expect to make an application  
23 to the Court to continue the deposition.

24 I repeat my suggestion that we should  
25 try to before we all leave today find a date when

1 We've been living with this now for two  
2 days. We're familiar with the Exhibits. As you get  
3 away from a deposition, any deposition, we all know  
4 that you have to get back up to speed. You have to  
5 start to review a transcript from the start, getting  
6 into all the Exhibits again. So I do want the  
7 record to be clear that that is the offer that we  
8 have on the table.

9 We're prepared to go until 7:00 tonight  
10 after a very short recess here, resume at 9:30  
11 tomorrow and continue until 1:00.

12 MR. SKOLNIK: Unfortunately, that's not  
13 possible for me; and I heard at least one other  
14 counsel say that they couldn't either.

15 I mean, I take your point about the  
16 Exhibits being fresh in everyone's mind, and I  
17 certainly would be happy to resume this deposition  
18 next week.

19 MR. CAMPION: Well, we've brought the  
20 witness down here. He had to rearrange his own  
21 life.

22 We have our offer on the table,  
23 Mr. Skolnik.

24 MR. SKOLNIK: Well, unfortunately, it's  
25 one that doesn't work so...

1 everyone can make it if the Court so orders, but we  
2 are going to stop for the day.

3 MR. CAMPION: Okay. Well, we have made  
4 our position clear already, so thank you very much.  
5 Okay.

6 MR. McGUIRE: Peter, before we go off  
7 the record, you were going to give me dates for some  
8 depositions.

9 MR. SKOLNIK: I do not have dates yet  
10 for Mr. O'Hara, and I've already responded about  
11 Paul Martin.

12 MR. McGUIRE: How about Mr. Ross? Is he  
13 available on the dates we discussed? Did you send  
14 me an e-mail saying something happened?

15 Maybe that was you.

16 MR. KOFMAN: I think that was me, and  
17 I'll give you a call about that.

18 MR. McGUIRE: That's right. That's fair  
19 enough. I just want to make sure we have some  
20 dates.

21 THE VIDEOGRAPHER: We're going off the  
22 record at 5:46.

23 (Witness excused.)

24 (The deposition was adjourned for the  
25 day at 5:46 p.m.)

JURAT

I, KEITH A. RANIERE, do hereby certify that I have read the foregoing transcript of my testimony taken on March 12, 2009, and have signed it subject to the following changes:

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Sworn and subscribed to before me on this day of

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CERTIFICATE

I, CHERYL McGANN, a Certified Court Reporter and Certified Realtime Reporter of the State of New Jersey, authorized to administer oaths pursuant to R.S.41:2-2, do hereby certify that prior to the commencement of the examination, the witness was sworn by me to testify to the truth, the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony that was taken stenographically by and before me at the time, place, and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any the parties to this action and that I am not interested in the action.

CHERYL McGANN  
C.C.R. License No. XI000918

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