

DEPOSITION OF
MELODY GODINEZ
VASQUEZ V. KASPARIAN
TAKEN ON
DECEMBER 7, 2017



PHONE 855.525.3860 | 323.938.8750

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF SAN DIEGO CENTRAL DIVISION
3
4
5 ISABEL VASQUEZ,)
6 Plaintiff,)
7 vs.) Case No.
8 MICKEY KASPARIAN; UNITED) 37-2016-00044511CU-OE-CTL
9 FOOD & COMMERCIAL)
10 WORKERS LOCAL 135, a labor)
11 union charter; and DOES 1)
12 through 20,)
13 Defendants.)
14
15 DEPOSITION OF
16 MELODY GODINEZ
17 SAN DIEGO, CALIFORNIA
18 DECEMBER 7, 2017
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22
23 Reported By:
24 CHRISTINE E. MILKOVITS
25 CSR No. 12650
JOB No. 17-59182

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ALSO PRESENT:
ISABEL VASQUEZ
MICKEY KASPARIAN

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
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8 MICKEY KASPARIAN; UNITED) CU-OE-CTL
9 FOOD & COMMERCIAL)
10 WORKERS LOCAL 135, a labor)
11 union charter; and DOES 1)
12 through 20,)
13 Defendants.)
14
15 Deposition of MELODY GODINEZ, taken on
16 behalf of Plaintiff, at 17140 Bernardo Center Drive,
17 Suite 358, San Diego, California, beginning at 9:33 a.m.
18 and ending at 1:09 p.m. on Thursday, December 7, 2017,
19 before CHRISTINE MILKOVITS, Certified Shorthand
20 Reporter No. 12650.
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23
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25

1 I N D E X
2 WITNESS: MELODY GODINEZ
3 EXAMINATION BY PAGE
4 MR. CORRALES 5
5 MR. FEINBERG 57
6
7 E X H I B I T S
8 DEFENDANTS' DESCRIPTION PAGE
9 1 Copy of text message dated 121
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1 San Diego, California, December 7, 2017
2 9:33 a.m.
3
4 MELODY GODINEZ,
5 having been duly sworn, testified as follows:
6
7 EXAMINATION
8 BY MR. CORRALES:
9 Q Good morning.
10 A Good morning.
11 Q Please give us your full name.
12 A Melody Marleny Godinez.
13 Q How do you spell Godinez?
14 A It's like God -- G-o-d-i-n-e-z.
15 Q Okay. So Ms. Godinez, have you ever had a
16 deposition taken before?
17 A No.
18 Q Do you understand what a deposition is?
19 A I do.
20 Q Okay. So let me just tell you that today's
21 deposition is being taken under what we call penalties
22 of perjury.
23 Do you understand that?
24 A I do.
25 Q Do you understand if you don't tell the truth

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1 in today's deposition you could be punished?
2 A I do.
3 Q It's a crime.
4 Do you understand that?
5 A I do.
6 Q Okay. All right. Now, because of the nature
7 of the deposition, which is being taken outside and away
8 from the courthouse at the convenience of the attorney's
9 office, we have a court reporter here who has to take
10 down what you say in the deposition. In fact, she has
11 to take down what anybody says in this room.
12 And people are entitled -- the lawyers and
13 you -- not the other people -- but just the lawyers and
14 you are entitled to speak. But you have to speak when
15 the time is right. When you -- when I ask you a
16 question, wait for my question to be finished before you
17 answer. Okay?
18 A Okay.
19 Q And then I will wait until your answer is
20 finished before I ask you another question. Okay?
21 A Okay.
22 Q Okay. And you're doing good. Give us verbal
23 words. You know, gestures, noises like uh-huh or huh-uh
24 -- it's hard for the court reporter to interpret that.
25 So if it's a yes, say yes. If you need to describe

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1 something, describe it in words.
2 If an attorney wants to make an objection,
3 wait for the objection to finish and then answer the
4 question. Okay? So, again, we don't have overlapping
5 conversations going on.
6 The objections are basically for the record.
7 So no lawyer in here can tell you not to say something
8 or to say something. Okay? It's you that are
9 testifying and you give your testimony. So when you
10 hear an objection of a lawyer, it might sound
11 maybe -- maybe they're upset, but they're not really
12 talking to you. They're talking to the record so they
13 can preserve there objections. Okay?
14 A Okay.
15 Q All right. I'll be asking you questions that
16 have to do with the past, things that happened maybe
17 months, maybe weeks, maybe years ago. And not everybody
18 remembers everything specifically. Sometimes people can
19 remember if they went to a baseball game. And maybe
20 somebody questions them, Did you go to a game? Yes.
21 What was the score in inning five? I don't know. It's
22 not appropriate to say, well, then you didn't really go
23 to the baseball game. Yes, I did go.
24 The best I can remember I was sitting there.
25 It was nighttime. And the Padres were playing the

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1 Giants. That's my best recollection.
2 Do you understand that?
3 A I do.
4 Q Okay. So I'm entitled to your best
5 recollection even though you may not remember specifics.
6 I'm entitled to have you tell me what you remember to
7 the best of your recollection.
8 Do you understand?
9 A I understand that.
10 Q We want to stay away from speculation.
11 Guessing is something that I don't want and neither do
12 the attorneys want. Example of that is if I were to ask
13 you how long this table is, you can estimate that to the
14 best of your ability and say, I think it's about maybe
15 what? -- 15 feet long maybe. That's because you are
16 basing that on what you observe. Your sight and the
17 senses. Okay?
18 If I were to ask you the same question about
19 how long my table is in my house, you would simply
20 guess. You would have no way of knowing that because
21 you've never been to my house. So it's the senses we're
22 looking for -- the sight, sound, smell sometimes, and
23 taste. People use that to testify about what they
24 remember happened.
25 They can smell the smoke. They heard the

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1 tires screeching before the accident. They saw the
 2 light was red. It wasn't green. All of those are
 3 senses. But to say, Yeah, I think he's a speedster but
 4 I wasn't at the scene of the accident, that's a guess.
 5 Do you understand that?
 6 A Yes.
 7 Q Okay. All right. So is there any reason why
 8 we can't take your deposition today?
 9 A No.
 10 Q The reason I ask that is I want to make sure
 11 that what you testify today is based upon your best
 12 ability to remember and testify. If you're under the
 13 influence of alcohol, if you're taking any form of
 14 medication that you think might affect your testimony,
 15 please let us know. Okay?
 16 A Okay.
 17 Q So the question is: Are you under the
 18 influence of alcohol?
 19 A No.
 20 Q Are you taking any form of medication that you
 21 think might influence or impact your testimony?
 22 A No.
 23 Q Okay. All right. Ms. Godinez, are you
 24 presently employed?
 25 A Yes.

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1 Q Where are you employed?
 2 A The County of San Diego.
 3 Q How long have you been employed there?
 4 A Five 1/2 years.
 5 Q What do you do there?
 6 A I'm a deputy clerk.
 7 Q Okay. Deputy clerk. What department?
 8 A At the County Clerk's Office.
 9 Q Okay. So is that like when people come to
 10 record deeds and so forth?
 11 A They do a number of legal items, including
 12 requesting marriage licenses, including getting sworn to
 13 be process servers. A number of county items.
 14 Q Okay.
 15 A But mostly legal items.
 16 Q Okay. So did you go to high school?
 17 A I did.
 18 Q What high school?
 19 A I went to Hart High School.
 20 Q Where is that located?
 21 A It's located in Newhall, California.
 22 Q Newhall?
 23 A Correct. N-e-w-h-a-l-l. One word.
 24 Q Okay. What year was that -- did you graduate?
 25 A That was in 2004.

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1 Q Did you attend any college?
 2 A I did.
 3 Q Which college did you attend?
 4 A Palomar College.
 5 Q Do you remember if you graduated? Got a
 6 degree of some sort?
 7 A I have over 70 units, but I won't have it
 8 until June.
 9 Q Okay. You're looking at like an associate's
 10 degree?
 11 A Correct. And legal studies before the
 12 transfer to Sacramento State.
 13 Q Good. So do you -- do you know a
 14 Mickey Kasparian?
 15 A I do.
 16 Q Okay. How do you know Mickey Kasparian?
 17 A We met online.
 18 Q Okay. When you say you met online, what do
 19 you mean by that?
 20 A I messaged Mickey because I admired him. I
 21 thought he did a lot of good things for the workers,
 22 based on what I had read. And that's how I met him.
 23 Q Okay. Did you have any involvement with the
 24 union activities?
 25 A I did.

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1 Q What's that?
 2 A At the time I was an active SEIU Local 221
 3 member.
 4 Q SEIU?
 5 A Correct. Services Employees International.
 6 Q In what way were you active? Were you a
 7 delegate?
 8 A No. I was just an active member. I'm a
 9 county employee, thus I'm represented by SEIU.
 10 Q And did you ever attend union events?
 11 A Yes.
 12 Q Did you see or interact with Mickey at any of
 13 these union events?
 14 A Yes.
 15 Q Okay. Okay. How active were you with the
 16 union? Did you like attend demonstrations or rallies?
 17 Describe your activities in the union.
 18 A I think you summed them up pretty well. I
 19 attended demonstrations, union meetings, rallies, so
 20 much so that I went on to become an executive board
 21 member for SEIU Local 221, the same union.
 22 Q What is an executive board member?
 23 A It means that you're elected to represent the
 24 larger body of the union. In our case we have about
 25 12,000 members. I'm one of 15 that represents the

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1 clerical unit.
2 Q Okay. All right. During these demonstrations
3 and rallies and so forth, did you see Mickey from time
4 to time?
5 A I did.
6 Q Okay. Did there come a time when you had
7 close contact with Mickey, other than just seeing him at
8 rallies, where you spoke with him, met with him, that
9 sort of thing?
10 A Yes.
11 Q Okay. Did there ever come a time when you
12 were meeting with Mickey and he groped you?
13 MR. FEINBERG: He what?
14 MR. CORRALES: I think you heard me.
15 MR. FEINBERG: I did not hear you.
16 MR. CORRALES: Again, you know, keep it down.
17 MR. FEINBERG: Don't ignore me --
18 MR. CORRALES: I'm not ignoring you. Don't
19 raise your voice.
20 MR. FEINBERG: So repeat the question.
21 MR. CORRALES: I will.
22 BY MR. CORRALES:
23 Q Did there come a time when Mickey groped you?
24 A Yes.
25 Q Okay. When was this? How many times? More

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1 than once?
2 A More than once.
3 Q Let's take the first time that he groped you.
4 Where did this happen?
5 A At Hunter Steakhouse.
6 Q Hunter Steakhouse. Where at Hunter
7 Steakhouse?
8 A In San Diego.
9 Q Okay. And then was it -- was it in the
10 restaurant or where was it? In the parking lot?
11 A I'm sorry. I need to pause.
12 Q Go ahead.
13 A I need -- for the record, I need to make sure
14 that I'm safe in here.
15 Is there a protocol if things become violent?
16 Because I keep hearing outbursts.
17 Q You're safe in here. Nobody will harm you.
18 We have security in the building. We have gentlemen
19 here, lawyers, myself included. No one is going to hurt
20 you.
21 A Okay. I fear for my safety, almost for a year
22 at this point, and I'm experiencing outbursts from this
23 side of the room.
24 MR. CORRALES: And counsel for Mr. Kasparian
25 I'm trusting that you will keep your client at bay.

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1 MR. FEINBERG: When we hear comments that are
2 the first time anyone has ever said such a thing and it
3 is clear to my client that his reputation is being
4 sullied and that the witness is lying, it is not
5 unexpected that he might have a visceral reaction.
6 With that said --
7 MR. CORRALES: You'll keep your client at --
8 MR. FEINBERG: Certainly. He's not going to
9 be of any harm to her.
10 THE WITNESS: He already has harmed me, sir.
11 BY MR. CORRALES:
12 Q Stay focused here.
13 Okay. So the first time that he groped you
14 was at Hunter Steakhouse.
15 Where in Hunter Steakhouse? Inside the
16 restaurant?
17 A It's in Restaurant Row in San Diego in
18 Mission Valley. It was in the parking lot.
19 Q Was it in somebody's car?
20 A Correct. It was in Mr. Kasparian's car.
21 Q Okay. How did you happen to be in his car?
22 A He lured me into his car. He asked me to go
23 inside of his car.
24 Q Okay. And when you went into his car, what
25 happened?

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1 A He groped me.
2 Q How did he grope you? Did he touch you in
3 private areas of your body?
4 A First he started caressing my leg.
5 Q Yes.
6 A Then he moved his hand to my genital areas on
7 the outside.
8 Q Yes.
9 A And then he moved his hands around my breasts
10 on the outside.
11 Q Okay.
12 A And then I became very uncomfortable.
13 Q What did you tell him, if anything, when he
14 did this to you?
15 A I told him that I felt uncomfortable.
16 Q When you said that he touched you in your
17 genital areas, do you mean in your crotch?
18 A Yes.
19 Q Inside your pants or outside of your pants?
20 A Outside.
21 Q Did he ever try to go inside your pants?
22 A Not that occasion.
23 Q Okay. That's fine.
24 MR. CORRALES: Again, Counsel, we're hearing
25 noises from your client. Can you please ask him to be

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1 quiet during the deposition.
2 MR. KASPARIAN: It's hard.
3 MR. FEINBERG: I know.
4 BY MR. CORRALES:
5 Q So did you --
6 MR. FEINBERG: Take a break.
7 MR. CORRALES: Okay.
8 Off the record.
9 (Recess taken.)
10 MR. CORRALES: Back on the record.
11 BY MR. CORRALES:
12 Q Okay. I think we were talking about this
13 first occasion where you testified that Mr. Kasparian
14 groped you in his car in the parking lot at Hunter
15 Steakhouse in San Diego.
16 And you described where he touched you -- in
17 your crotch and in your breast?
18 MR. FEINBERG: Objection. Mischaracterizes --
19 MR. CORRALES: Don't interrupt me, please.
20 MR. FEINBERG: If you're mischaracterizing the
21 testimony --
22 MR. CORRALES: No, you won't do that.
23 MR. FEINBERG: I will.
24 BY MR. CORRALES:
25 Q And you said he touched you in your breast

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1 area, correct?
2 A Yes.
3 Q Okay. All right. Then I can't remember if
4 you said this, but did he try to kiss you?
5 A Yes.
6 Q How did he try to do that? What did he do?
7 A He leaned over from his seat, and he attempted
8 to kiss me. I moved my face, and I felt his lips and
9 tongue on the side of my lip.
10 Q Okay. What, if anything, did he say to you
11 when he was doing this to you, if you remember?
12 A I'm giving you my best recollection.
13 Q Okay. That's fine. If you can't remember,
14 that's fine.
15 And how long were you in his car when this
16 happened?
17 A Approximately 10 minutes.
18 Q Okay. And did he spark up a conversation
19 before he started to grope you?
20 A We had a conversation inside the restaurant
21 before --
22 Q Okay.
23 A -- before he lured me into his car.
24 Q All right. Then in the -- in his car did he
25 say why he wanted you to come into his car? Just to

Page 19

1 talk or what?
2 A No. He just said, Let's go to my car. I
3 imagined he was just going to say bye.
4 Q All right. Fine. Did there -- was there
5 another occasion where Mr. Kasparian groped you in his
6 car or in a parking lot?
7 A Yes.
8 Q Where was that?
9 A In a parking lot on Pacific Highway in
10 San Diego, California.
11 Q Okay. Going back to the Hunter Steakhouse
12 parking lot incident, what date was that? What year?
13 A It was sometime in 2014, to the best of my
14 recollection.
15 Q Okay. Okay. So the PCH parking lot you said
16 was on Pacific Highway?
17 A Correct. Near Harbor Drive.
18 Q What was the occasion for that? Was there a
19 union activity going on?
20 A That's correct.
21 MR. FEINBERG: I'm going to object to this
22 whole line of questioning as irrelevant to -- I'm
23 presuming we're here on the Vasquez case.
24 MR. CORRALES: Your objection is noted.
25 ///

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1 BY MR. CORRALES:
2 Q What was going on --
3 MR. FEINBERG: Counsel, time to stop --
4 BY MR. CORRALES:
5 Q What was it --
6 A Sorry. The gentleman keeps interrupting --
7 MR. FEINBERG: No. I am making an
8 objection --
9 MR. CORRALES: Hey, hey. Keep it down. I
10 told you this before. Don't yell at the witness and
11 don't yell at me. Did you hear that? Are we clear on
12 that?
13 MR. FEINBERG: You will not interrupt me when
14 I'm making an objection.
15 MR. CORRALES: What is your objection?
16 MR. FEINBERG: My objection is that this is
17 irrelevant.
18 MR. CORRALES: That's all you have to say.
19 MR. FEINBERG: No, it isn't. You don't tell
20 me what I want to say.
21 MR. CORRALES: I'm telling you what the
22 objection is supposed to be.
23 MR. FEINBERG: Counsel --
24 MR. CORRALES: Give us your objection.
25 MR. FEINBERG: You be quiet. My objection is

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1 it's not relevant to anything that is involved in the
2 Vasquez litigation.
3 MR. CORRALES: Okay.
4 MR. FEINBERG: Anything that this witness has
5 to say is unknown completely to Ms. Vasquez during her
6 employment there.
7 MR. CORRALES: All right. You don't need to
8 say all that. Just say objection. Irrelevant. It's
9 actually not a basis for an objection at a deposition.
10 MR. FEINBERG: It is.
11 MR. CORRALES: So let's go back -- have my
12 question read back, please.
13 (Pending question read back by the reporter.)
14 BY MR. CORRALES:
15 Q So there's union activity going on. We're
16 talking about PCH parking lot.
17 Were you in his car?
18 A Yes.
19 Q How did you happen to go into his car?
20 A I had parked my car on PCH. And the union
21 activity required that folks marched around. So we had
22 marched and, thus, I needed to get back to my car. He
23 offered me a ride back, since his car was closer, and I
24 agreed.
25 Q What year was that about?

Page 22

1 A To the best of my recollection, it was late
2 2015, early 2016.
3 Q Okay. And when you got into his car, what
4 happened?
5 A He projected the same pattern of behavior that
6 he did in the Hunter parking lot.
7 Q What did he do?
8 A He caressed my leg and groped me.
9 Q Where did he grope you?
10 A In the same area. On the genital area with
11 his hands and then like on my breast area right here.
12 Q Okay. Let the record reflect that the witness
13 has touched the outside clothing of her breast.
14 A Correct. On the outside of my breast and the
15 outside of my genital areas.
16 Q Okay. And did he try and kiss you?
17 A He did.
18 Q And how did he try to kiss you?
19 A He did the same thing. He leaned over and --
20 from his seat and I moved and I felt the side of his
21 tongue or lips on the side of mine.
22 Q Okay. And did you consent to his behavior in
23 his car at that time?
24 A No.
25 Q Going back to the Hunter Steakhouse incident,

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1 did you consent to his behavior at that time as well?
2 A No.
3 Q Okay. What happened when he groped you this
4 other time at the PCH parking lot? What did you do?
5 A I told him I felt uncomfortable because I saw
6 him as a mentor and a friend and that he was married.
7 Q What did he say, if anything?
8 A He appeared to not really care about that. He
9 didn't acknowledge any of it. And he continued to put
10 his hands -- run his hands up and down my legs.
11 Q Okay. And did he also try to -- did he also
12 touch your crotch?
13 A He did.
14 Q Did there come a time when he tried to go
15 underneath your clothing at any time?
16 A Yes.
17 Q Was it at that time or some other time?
18 A Another time.
19 Q Okay. Let's -- let me ask you about any other
20 incidents where he groped you in his car.
21 Was there any other incidents like that, if
22 you remember? You gave us two incidents, correct?
23 A Correct. Thus far I've given you two. There
24 is a number of them.
25 Q So how many others do you recall? How many

Page 24

1 other incidents where he groped you in his car?
2 A Another one that comes to mind was not in his
3 car.
4 Q Okay.
5 A It was an incident. So that's what I meant
6 there's another incident.
7 Q Where was that?
8 A It was in his office at UFCW Local 135.
9 Q And what was the occasion of you being in his
10 office at that time?
11 A He asked to meet up at his office at night
12 after some type of political event.
13 Q Okay. How did you get into his office?
14 A He opened the door with a key. We walked up a
15 walkway to the back of his office.
16 Q Okay. Had you ever been there before?
17 A Not inside his office.
18 Q All right.
19 A But I had been to UFCW.
20 Q Did you know there was a back door to his
21 office before that time?
22 A I had no idea.
23 Q Okay. And so when you went up to his office
24 -- can you describe what his office looked like in
25 general.

Page 25

1 A Yes, it was very big. It seemed like it had a
2 secretary area sectioned off. And I recall seeing a lot
3 of pictures. It almost seemed like it was a trophy
4 room. I wasn't sure if it was an office or some kind of
5 showcase for him. I was really surprised to see how
6 many pictures he had.
7 Q Okay. And describe the furniture.
8 A There was a couch in there. I recall seeing a
9 couch that we later sat on.
10 Q Okay. Was there a desk?
11 A I do recall seeing a desk, to the best of my
12 recollection.
13 Q Okay. All right. And what, if anything, did
14 Mr. Kasparian say about any of the pictures, if you
15 remember?
16 A I just remember acknowledging them. And he
17 acknowledged that he had, you know, a lot of influence.
18 Q Did he use the word "influence"?
19 A Power.
20 Q Okay. As what? President of the Local 135?
21 A Correct. And at the time he was also
22 president of the labor council before he was fired from
23 there due to this investigation.
24 Q Okay. Okay. So when you were in his office,
25 you said this was another time where he groped you?

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1 A Correct.
2 Q Describe what happened.
3 A We were sitting and the television was on.
4 Q So he had a TV in his office?
5 A Correct. I remember because we were watching
6 it.
7 Q Okay.
8 A And I sat on the far end of the sofa -- of the
9 couch. And he had alcohol. I don't quite recall what
10 drawer or where he took it out of. But he had a bottle
11 of whiskey, and he offered to give me a drink.
12 Q Okay.
13 A And I told him that I don't drink hard
14 alcohol. And I only drink wine or beer occasionally.
15 And he proceeded to drink. And at some point -- I
16 believe we were at his office for about an hour -- I
17 sat closer to me. And that's when he projected the same
18 pattern of behavior that he had in the other instances.
19 Q What did he do?
20 A He -- I felt like I was being assaulted. He
21 moved his hand on my legs.
22 Q Okay.
23 A And then he groped my genital area and -- on
24 the outside --
25 Q Okay.

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1 A -- and my breast area. I don't want to say
2 the word caressed because it was unconsented, but he
3 touched my breast.
4 Q Did he squeeze it?
5 A Yes. With his hand. He seemed to be mumbling
6 something, but I couldn't figure out what he was
7 mumbling.
8 Q Okay. To your knowledge, was he intoxicated?
9 A He was drinking alcohol.
10 Q Okay.
11 A So it depends on what your definition of
12 intoxicated is.
13 Q Okay. Okay. Did he try to get you
14 intoxicated?
15 A Yes. He tried to lure me to drink alcohol,
16 whiskey.
17 Q Was this the occasion where he tried to
18 come -- to get under your clothing?
19 A Yes. When we were sitting on the sofa, he
20 moved his hand. And he tried to put his hands in
21 between my pants and undergarments enough so that I felt
22 his hands on my skin on the lower abdominal area just
23 above my genital area.
24 Q Okay. And did you consent to this?
25 A Absolutely not.

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1 Q What, if anything, did you tell him when he
2 was doing this?
3 A That he's married, that I felt uncomfortable.
4 I also, to the best of my recollection, recall telling
5 him that I don't -- I don't hook up with people that are
6 married.
7 Q What did he say in response?
8 A He said that sometimes in marriages people are
9 not sexually satisfied and that they're just married on
10 paper but that if the other person doesn't know, it
11 really doesn't hurt them.
12 Q Okay. All right. So to the best of your
13 recollection, were there other incidents where he tried
14 to grope you in his car but maybe you just don't
15 remember the specifics?
16 A I'd like to note additional info regarding
17 this incident at the office.
18 Q Okay. What other events happened at his
19 office when he was groping you?
20 A That same night when I imagine he realized I
21 wasn't going to drink, he got a trash bag. Because I
22 asked him whether he would get in trouble for having
23 alcohol at the office. And he put the bottle inside of
24 the trash bag and threw it out when we exited.
25 But before we exited the building, he

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1 proceeded to turn off the lights inside of his office,
2 and he pinned me down against the sofa -- against the
3 couch. And the entire time I felt helpless. I knew
4 that there could be ramifications if I brought it up to
5 anybody.
6 Q Were you scared?
7 A Absolutely. I felt like I was being raped.
8 Q All right.
9 A I felt like the assault that happened was
10 probably something that he did to other women, but I
11 didn't know Mr. Kasparian really.
12 Q How did you get out of this situation where he
13 was pinning you against the couch?
14 A He actually exited. That's when we left. I
15 think he realized there was no way I was going to
16 consent to that. We actually ended up leaving the room
17 and exiting.
18 Q Okay.
19 A That's when he proceeded to throw away the
20 bottle of whiskey in the outside trash area. At the
21 time there was a trash area on the side of the building
22 where you drive the cars through where cars get access
23 to the parking lot. I remember finding that suspicious.
24 Nonetheless, I was startled that he even had alcohol at
25 the building.

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1 Q Okay. All right. Have you described
2 everything that you can remember that happened in his
3 office that night, to the best of your recollection?
4 A To the best of my recollection, with the
5 anxiety I feel in this room based on the outbursts, yes.
6 Q All right. Now, did there come a time when
7 you had -- not a meeting, but you met Mr. Kasparian with
8 some other ladies at a hotel?
9 A Yes.
10 Q When did that occur?
11 A Approximately April 2015.
12 Q Okay. And who -- what hotel was this?
13 A It was at the Hilton.
14 Q Where?
15 A In San Diego. And I believe the address is
16 One Park Place. Right on the bay.
17 Q All right. How did you happen to go there?
18 A Mr. Kasparian and I had agreed that we would
19 meet there with these two women.
20 Q And what, if anything, did you understand
21 Mr. Kasparian wanted to do at the hotel?
22 A It was my understanding that he wanted to have
23 a foursome.
24 MR. KASPARIAN: Really?
25 ///

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1 BY MR. CORRALES:
2 Q When you say "foursome," what does that mean?
3 A I mean Mr. Kasparian wanted to have sexual
4 relations with Monica Bonilla, with me, and
5 Alicia Nichols that night at that hotel.
6 Q When you say foursome, that means having sex
7 together at one time?
8 A Correct.
9 Q Okay. Now, did you -- and you say Monica --
10 what was her last name?
11 A Bonilla.
12 Q And Alicia --
13 A Nichols.
14 Q Did you, Monica, and Alicia meet with
15 Mr. Kasparian at this hotel?
16 A We did.
17 Q Where did you first meet, what part of the
18 hotel?
19 A In the hotel bar facing the water.
20 Q Okay. And who was present? All of you guys?
21 A We came at different times.
22 Q Okay. And did there come a time when you were
23 all together in the bar?
24 A That's correct.
25 Q What was discussed, if anything, while you

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1 were in the bar?
2 A Mr. Kasparian's power. That was a common
3 topic. He often likes to tell people about his
4 influence and that he runs --
5 Q That he has power?
6 A Yes. -- that he runs San Diego.
7 Q What did you understand that to mean?
8 A That he has the ability to ruin someone's
9 career or make someone's career; that if you're on his
10 bad side, he could retaliate against you. And if you're
11 on his good side and you submit to what he says, you'll
12 be okay.
13 Q Okay. When you were there in the bar, did
14 there come a time when Mr. Kasparian said something
15 about a room or suite?
16 A Yes.
17 Q What did he say?
18 A He said that we should go upstairs to the
19 room.
20 Q Did he say he had a room?
21 A Yes.
22 Q And when he said we should go upstairs, why
23 did you go upstairs?
24 A Because he had asked me to go upstairs with
25 him and the other women. He --

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1 Q Go ahead.
2 A He wanted us to have a foursome with him. And
3 I was concerned that if I didn't go upstairs he would
4 have sexual relations with my friend Alicia. And I was
5 worried about her.
6 Q Were you trying to protect Alicia?
7 A Yes.
8 Q So did Alicia also go upstairs with you?
9 A Yes.
10 Q Did Monica go upstairs?
11 A Yes.
12 Q When you went upstairs, what did you discover
13 in terms of the room?
14 A I discovered that the room wasn't a room. It
15 was, to the best of my knowledge, like a mini mansion
16 room. It was like a suite. It was the biggest hotel
17 room I had ever seen.
18 Q Do you know who paid for that?
19 A I suspect that it was --
20 MR. FEINBERG: Objection. Move to strike.
21 Witness is speculating.
22 BY MR. CORRALES:
23 Q Go ahead. You can answer.
24 A The reason that I think that the union paid
25 for this is because later that night I picked up the

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1 phone and the phone had an automated message. And in
2 the message it said a woman's name. So that room was
3 registered to a woman's name. I wouldn't think you
4 would use your personal card and have some other
5 person's name on it unless you used it for a business
6 matter.
7 Q Okay.
8 A I stayed at other hotels where it says your
9 room to whom you register the room to, not some random
10 woman's name.
11 Q Was there anything about -- let me back up a
12 little bit.
13 Did you happen to find out what the bar tab
14 was?
15 A Yes. It was between 300 to \$500. I recall
16 this because I remember that it was more than a couple
17 hundred dollars.
18 Q Okay. Do you know, for example, who paid for
19 that?
20 A Yes.
21 Q Who?
22 A Mr. Kasparian.
23 Q Do you know if he used union funds for that?
24 A It's my understanding that he did.
25 Q What's that based on?

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1 A The notion that the room was registered in
2 someone's name that was not his name.
3 Q So it was a bar tab billed to the room, to
4 your knowledge?
5 A I don't know.
6 Q Okay. Okay. So when you're up in this suite,
7 did everybody go inside?
8 A We all went up together.
9 Q And what, if anything, did Mr. Kasparian do
10 that indicated to you that he wanted a foursome inside
11 the room? What did you see?
12 A He sat down on the sofa with Ms. Bonilla and
13 they began kissing.
14 Q On the couch?
15 A Correct. And --
16 Q Then what happened?
17 A Alicia and I stood at the corner of the room.
18 We were still in awe of how big the room was. And at
19 that point after they had been kissing for a little bit
20 and touching each other's body parts on the outside of
21 clothing, that's when she -- Monica Bonilla beckoned for
22 me to come sit on the couch with her.
23 Q Did you?
24 A I proceeded to sit on the end of the couch,
25 that's correct, with Alicia still in the room.

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1 Q Okay. And did Mr. Kasparian -- what, if
2 anything, did Mr. Kasparian do when you sat on the
3 couch?
4 A He projected the same behavior that he
5 projected in the other instances in the past with me.
6 Q What did he do?
7 A He moved his hands across -- because she
8 was -- her body was across both of ours.
9 Q Monica?
10 A Correct. She was laying on both of us at that
11 point. And he leaned over across her body and started
12 touching my legs attempting to, I imagine, have sexual
13 relations with me. I felt like I was being assaulted.
14 But he groped my genital areas. And I felt very
15 uncomfortable because Alicia was in there.
16 MR. FEINBERG: Off the record for a minute.
17 BY MR. CORRALES:
18 Q Continue. Continue. You felt uncomfortable
19 because?
20 A Alicia was in there, and I didn't want to
21 leave her alone. So Alicia, at that point, mentioned
22 that she needed to have a smoke break. So given the
23 fact that he was touching my body while he was kissing
24 her, I decided to get up and go with her. I didn't
25 want -- go with Alicia to have the smoke break with her.

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1 Q So let's stop there.
2 When you were on the couch, you said
3 Mr. Kasparian groped you, correct?
4 A Correct.
5 Q And he groped you in your genital area?
6 A Yes.
7 Q Outside of your clothing?
8 A Yes.
9 Q And you said that he also groped you on your
10 breast area, correct?
11 A Correct.
12 Q Outside of your clothing?
13 A Yes.
14 Q Did he try to kiss you?
15 A He couldn't lean over. He tried to lean
16 closer but Monica's body was blocking us.
17 Q Okay. Was he also kissing Monica's body?
18 A He was kissing her neck, her mouth. They were
19 kissing with their tongue too.
20 Q Okay. All right. So you got up and you left
21 with Alicia; she wanted to take a smoke break.
22 Did you, in fact, have a smoke break with her?
23 A I accompanied her during the smoke break.
24 I've never been a smoker. But, yes, I stayed with her
25 while she smoked to make sure that she was safe. That

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1 was the objective of me going to the hotel, her safety.
2 Q Did you eventually go back to the hotel suite?
3 A We did. After her smoke break we went up.
4 Q How long were you gone?
5 A Approximately 15 minutes.
6 Q Okay. So when you got back, what, if
7 anything, did you observe about the suite when you came
8 back --
9 A The --
10 Q -- in terms of your senses?
11 A Sure. When I first opened the door, the first
12 thing that I saw was their faces. They were very
13 startled. And Mr. Kasparian's pants were unzipped. And
14 Ms. Monica -- Ms. Bonilla's hair was disheveled. It
15 looked like someone had grabbed her by the head and
16 moved her hair around. But after seeing that with my
17 sight, I also noticed that there was a strong smell in
18 the room.
19 Q Smell of what?
20 A The smell of sexual fluids.
21 Q Semen?
22 A Yes, semen.
23 Q All right.
24 A Alicia noticed the smell too. She commented
25 to me, Did you smell that? And we both agreed that we

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1 smelled an overwhelming smell, which was startling to me
2 because she had just taken a smoke break. So you would
3 think the smell of cigarettes would overpower, but no.
4 Q So later sometime did you have an occasion to
5 talk to Monica Bonilla about this incident?
6 A Yes.
7 Q Did she tell you whether or not she, in fact,
8 had sex with Mr. Kasparian?
9 A Yes.
10 Q What did she say? What words did she use to
11 describe having sex with him?
12 A To the best of my knowledge, she said that she
13 had sex with him.
14 Q Did she say "sex" or use other words?
15 A She said, I had sex with him.
16 Q Okay. All right. When you came back to the
17 room and you saw Mr. Kasparian with his pants unzipped
18 and you smelled what you smelled, anything else happen
19 when you came back to the room? Did you have a
20 conversation with anybody?
21 A Alicia and I -- I believe we -- to the best of
22 my knowledge, we used the restroom. That's when we had
23 the conversation, Hey, do you smell that overwhelming
24 smell?
25 Q Okay. All right. Did you ultimately leave

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1 the room?
2 A Mr. Kasparian noted that there was another
3 suite in addition to the -- that particular suite that
4 we were in.
5 Q Did you know that before?
6 A I did not.
7 Q What did he say?
8 A He said, There's an extra room next door. And
9 he proceeded to show me the room and give me a room key.
10 It was adjacent to the large suite we were in.
11 Q Did you have an understanding that he
12 had -- that he had -- not purchased, but he had rented
13 that room?
14 A Yes.
15 Q And do you know how he rented it? His money
16 or union money?
17 MR. FEINBERG: Objection. Calls for
18 speculation.
19 THE WITNESS: I believe, to the best of my
20 knowledge, it was union money, since the voice mail had
21 a woman's name. And I don't see why it would have a
22 woman's name if Mr. Kasparian had, in fact, registered
23 the rooms for personal use for himself.
24 BY MR. CORRALES:
25 Q Did you stay in that room?

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1 A I did.
2 Q Overnight?
3 A Overnight, yes. But he and I only went in
4 that room for a moment for him to show me the room. He
5 gave me the room key, opened the door, showed me, hey,
6 here's the other room. And we walked back into the room
7 with Monica -- where Monica and Alicia were.
8 Q The suite?
9 A Correct.
10 Q So what did you do when you were in the suite?
11 A We were in the suite. Alicia was very
12 uncomfortable, and she told me that she was going to
13 leave. So that's when she told the rest of the group,
14 Hey, it's getting late; I'm going to get going.
15 Q Did she, in fact, leave?
16 A Yes. To the best of my knowledge, she left at
17 the same time that Mr. Kasparian left.
18 Q So they both left together?
19 A To my knowledge.
20 Q Did they leave in separate cars?
21 A Yes. She confirmed they left in separate
22 cars. It was my knowledge she drove -- she didn't drive
23 there. I believe she Ubered it, if I'm not mistaken.
24 It was so long ago.
25 Q All right. Okay. Did you stay in the room?

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1 A I did. I stayed in the room.
2 Q Did you at any time receive a text message
3 from Mr. Kasparian about what had happened?
4 A Yes.
5 Q What did you receive?
6 A The next morning I received a text message
7 from him acknowledging that he had oral sex with her.
8 Q Oral sex with who?
9 A With Monica Bonilla.
10 Q Okay. Did Monica Bonilla tell you that he
11 performed oral sex on her?
12 A She said she had sex with him.
13 Q Okay. She didn't say oral sex?
14 A No.
15 Q And what else did Mr. Kasparian say in the
16 text message to you?
17 A In the text message he asked me whether I
18 wanted him to stop talking to Monica. And --
19 Q Why would he say that, to your knowledge?
20 A I think that he thought I had a crush on her.
21 Q Why would he think you had a crush on her?
22 A Because I thought she was pretty.
23 Q When you say "she" --
24 A I had expressed that to him, that I thought
25 she was pretty.

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1 Q Are you bisexual?
2 A I am bisexual.
3 Q To your knowledge, did Mr. Kasparian know
4 that?
5 A Yes. I had been very open about that.
6 Q Okay. Now what else did he say in his text
7 message?
8 A He asked me to call him.
9 Q Okay. Did you call him?
10 A I did --
11 Q And --
12 A -- that same morning.
13 Q What happened when you called him?
14 A He seemed very nervous on the phone. And he
15 told me that, you know, I was his good friend and, you
16 know, that what happened stays between us. And I saw
17 him as a mentor too -- as a friend and a mentor. So
18 it's hard for me to talk about this.
19 Q Okay. Okay. Did there come a time when
20 Mr. Kasparian called you and was masturbating when he
21 spoke with you on the phone?
22 A Yes.
23 Q When did this occur? Give me the general
24 date, year, if that's all you remember.
25 A To the best of my recollection, it was

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1 sometime in 2015.
2 Q Okay. Late 2015?
3 A Yes.
4 Q Okay. And describe what happened when he
5 called you on that occasion.
6 A We had been messaging each other. And when he
7 called me, he acknowledged that he was masturbating.
8 Q What did he say that led you to believe he was
9 masturbating?
10 A He said, I'm touching myself. And I heard the
11 noise in the background that sounded like that of a
12 penis being ejaculated.
13 Q And did you ask him if he was masturbating?
14 A Yes.
15 Q What did he say?
16 A Yes, he was.
17 Q Okay.
18 A His voice and his -- he was out of breath and
19 he was whispering because he didn't want his wife to
20 walk in.
21 Q Okay.
22 A And --
23 Q What else happened during this conversation
24 when he was masturbating on the phone with you, if
25 anything you remember about that conversation?

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1 A I ended up getting off the phone. I felt
2 really uncomfortable.
3 Q How did you get off the phone? Did you say
4 you had to go or just hang up?
5 A Yeah. To the best of my recollection, I told
6 him I needed to go.
7 Q Why didn't you just hang up as opposed to
8 saying I have to go?
9 A Because I feared Mr. Kasparian.
10 Q When you say that you feared Mr. Kasparian,
11 did there come a time when this fear manifested itself
12 when you spoke to a friend of yours by the name of --
13 Ariana is her name?
14 A Yes.
15 Q What's her last name?
16 A Casonova, C-a-s-o-n-o-v-a, I believe.
17 Q And who is she?
18 A She's a former SEIU political organizer --
19 SEIU 1021 from the Bay Area.
20 Q To your knowledge, does she know
21 Mr. Kasparian?
22 A I introduced them online.
23 Q Okay. And when did you last speak with her?
24 A Less than a week ago.
25 Q What, if anything, did she tell you that led

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1 you to believe -- led you to feel that you were afraid
2 of Mr. Kasparian?
3 A She told me that she told Mr. Kasparian to
4 leave me alone and she feared for my safety because he
5 told her that I needed to stay out of the Isabel,
6 Anabel, and Sandy cases, that I needed to stay out of
7 it. To me, I took that as a direct threat.
8 And since then a lot of unusual things have
9 happened like my car getting broken into. I got a phone
10 call at work --
11 MR. FEINBERG: Objection. The witness is just
12 speculating wildly.
13 BY MR. CORRALES:
14 Q They can't stop you. Keep going. Your car
15 got broken into.
16 What else?
17 A Correct. Someone called my job -- my
18 worksite. And my coworker answered -- she let me talk.
19 When I spoke to the person, they identified as Angela.
20 And that's one of the fake accounts that Mr. Kasparian
21 used to use to talk to me on.
22 Q How do you know it was a fake account that he
23 used to talk to you?
24 A Because he introduced me to that woman -- to
25 that alleged woman.

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1 Q How did he do that?
2 A He told me something to the affect of, Hey, I
3 have a really hot friend named Angela. This was online
4 that he messaged me this. And his friend Angela -- he
5 proceeded to show me pictures of her. He said that she
6 had beautiful breasts and that I should hook up with
7 her. At the time I was single. And Angela always knew
8 random facts that no one else could know but
9 Mr. Kasparian.
10 But I think that he used that as a direct
11 threat so that I wouldn't testify today. That's why
12 this person called my work as Angela. And I will
13 testify under penalty of perjury that that voice was
14 Sarah Saez, which is one of the people that supports
15 him. She works for him. I recognize her voice. And my
16 coworker will testify to that too.
17 Q What did the voice that you understood to be
18 Sarah Saez say?
19 A She said, Your mom is a whore. And my mom is
20 the most important person in my life. It's clear that
21 this is a direct threat.
22 Q Okay. Did you feel that way during the
23 deposition today? Did you feel threatened today by --
24 A Absolutely. Not just by Mr. Kasparian but by
25 his counsel.

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1 Q Okay. All right. Now, tell me about this --
2 is it Ariana --
3 A Casonova.
4 Q -- Casonova. She -- just to clarify this, she
5 told you that she had a conversation with Mr. Kasparian
6 who told her to tell you to stay out of the Vasquez
7 lawsuits?
8 A Correct. She also told me that Mr. Kasparian
9 had offered her career opportunities and because of me
10 she declined them. And she told me I could mention this
11 at the deposition -- if counsel wants she'll say this
12 under penalty of perjury.
13 Q What did she mean when she said that
14 Mr. Kasparian offered her career opportunities?
15 A She took it as Mr. Kasparian trying to get her
16 on his side so that she would not support me should I
17 ask her to say what he told her, to say that I should
18 stay out of it.
19 Q Okay.
20 A That was the message that he wanted her to
21 give me.
22 Q Is this what she told you?
23 A Correct. She's a pretty smart woman. She
24 went to UC Berkeley. She doesn't have trouble
25 understanding when folks make statements.

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1 Q Okay. Did she use the word "bribe" in her
2 conversation with you? He was trying to bribe her?
3 A She did not use that word.
4 Q Okay. Were there any other times that you
5 experienced either sexual assault or groping by
6 Mr. Kasparian that you haven't told us about today, or
7 is that all that you can remember?
8 A Bear with me. It's my understanding I can
9 take as long as I want.
10 Is that correct?
11 Q Yes. You can take as long as you want.
12 A That's what I thought.
13 Yes, I remember another incident.
14 Q All right. What is that?
15 A We were in the parking lot of Corner Bakery in
16 Mission Valley just across from the freeway from UFCW
17 Local 135.
18 Q Okay.
19 A And --
20 Q You say "we."
21 You And Mr. Kasparian?
22 A Mr. Kasparian and I. That's correct.
23 Q In his car?
24 A That's correct.
25 Q What happened?

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1 A It was after a political event. And we met up
2 in the parking lot. I believe we were going to have
3 lunch, but I was in a rush. I had to get to work by a
4 certain time. It was a union political event. And
5 Mr. Kasparian did the same things he did in the other
6 incidents.
7 Q What did he do?
8 A He projected the same systemic pattern of
9 behavior. He groped me.
10 Q Where?
11 A In my genital area and my breast area without
12 my consent. At no point did I try to do anything to
13 make him feel like it was okay. The difference was this
14 particular time he grabbed my cheek and tried to pull me
15 towards him.
16 Q Grabbed it with his hands?
17 A Correct.
18 Q You indicated on the record that your head was
19 turned.
20 A Correct.
21 Q So he grabbed your cheek?
22 A Correct.
23 Q When he pulled, your head turned in his
24 direction?
25 A Correct, while I resisted.

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1 Q Did it hurt?
2 A A little bit. I'm not used to people pulling
3 on my face.
4 Q Was it like a pinch?
5 A It was like a pinch but a little stronger.
6 Q Okay.
7 A With more force.
8 Q You resisted, correct?
9 A That's correct.
10 Q And did you consent to his touching at that
11 time?
12 A No. I don't consent to any man touching me
13 without me explicitly telling them it's okay. No means
14 no.
15 Q Did you -- what, if anything, did you tell
16 Mr. Kasparian? Like, Leave me alone? What are you
17 doing?
18 A I told him that he was married and that I saw
19 him as a mentor and a friend. He didn't seem to
20 acknowledge that. I think that -- it seemed -- it
21 appeared, based on his behavior based on how nonchalant
22 it was, that he's used to women -- doing whatever he
23 wants and --
24 MR. FEINBERG: Objection. Witness is
25 speculating. Move to strike.

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1 BY MR. CORRALES:
2 Q Go ahead. Keep talking.
3 A My belief is based on the notion that he never
4 acknowledged the fact that I told him multiple times I
5 see you as a mentor. You know, I see you as a friend.
6 I'm not attracted to you. You're married. So I don't
7 think that's speculation.
8 Q Okay. Did you basically tell him to stop
9 every time he groped you?
10 A Yes.
11 Q Okay. Did there come a time when you sent
12 Mr. Kasparian a text message indicating that you
13 supported him?
14 A Yes.
15 Q When did that happen? And tell me why you
16 sent that.
17 A I was scared that if he knew that I was going
18 to make a public statement indicating that I had not
19 only seen but experienced the realities of the
20 allegations against him made by Isabel and Anabel and
21 Sandy that he would attack me.
22 Q You were afraid of him?
23 A Correct. I was afraid of the ramifications
24 not just with my career but with my safety. Just like
25 I'm afraid right now that he might take a gun out.

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1 Q All right. Now, let me ask you this: Did you
2 ever text him something to the affect that you thought
3 he should resign?
4 A Yes, I did.
5 Q Why did you do that?
6 A Because I knew that he had hurt me, and I knew
7 that he had hurt a lot of other people, not just
8 physically, but politically. He always put himself
9 before workers. And I knew that everything that he
10 claimed to stand for was not true. His principles go
11 against everything that the labor movement --
12 MR. FEINBERG: Objection. Motion to strike.
13 Answer is nonresponsive.
14 BY MR. CORRALES:
15 Q Keep talking.
16 A A person that really cares about or has basic
17 human decency and humanity --
18 MR. FEINBERG: Objection. Motion to strike.
19 Answer is --
20 MR. CORRALES: Would you stop interrupting the
21 witness. I asked her to explain why she sent the text
22 message for him to resign, and you're interrupting her.
23 You can make the objection when she finishes.
24 MR. FEINBERG: No. You make the objection in
25 advance, Counsel.

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1 MR. CORRALES: No.
2 BY MR. CORRALES:
3 Q Keep talking.
4 A A person that has good moral and ethical
5 values wouldn't have done any of the things that he did
6 to me over those different occasions and nor would they
7 retaliate against people.
8 Q Okay. So have you told us all the reasons you
9 think you sent the text message why you thought he
10 should resign?
11 A No.
12 Q Okay. What else?
13 A I know that he had attacked Olga Diaz in the
14 past.
15 Q Who is Olga Diaz?
16 A Olga Diaz is a city council member in the City
17 of Escondido. He felt that she crossed him politically.
18 And I knew that he would attack my friends, including
19 Nora Vargas because she's running for a college board
20 for re-election. He implied that any women that signed
21 support -- because there was a letter that was signed by
22 different people that have influence in the community.
23 And he had implied if anybody crossed him -- and he
24 implied it because he called me the Friday -- the Friday
25 that the complaint came out, I believe --

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1 Q The Vasquez complaint?
2 A I believe it was the Naranjo, to the best of
3 my knowledge. And he questioned me.
4 Q Mr. Kasparian?
5 A Correct.
6 Q What did he ask you?
7 A He was very nervous on the phone. He wanted
8 me to tell him -- give him names as to who had told me
9 that he was seen with Monica Bonilla.
10 Q Okay. What did you understand that to mean,
11 why he was asking you that?
12 A He wants -- I understood it to mean he was
13 going to attack anyone politically, like he did with
14 Olga Diaz by sending fliers out opposing her. Some
15 folks argue that that's why she lost the campaign for
16 mayor a few years ago, because Kasparian put all his
17 money against her because she didn't submit to him.
18 Q Okay.
19 A So I feared not only for myself, not only for
20 my career, for my family, but for the community and for
21 my friends that are doing good things in the community
22 such as running for office and have good ethics.
23 Because if you cross him, he's going to attack. He
24 already has.
25 Q Okay. So do you know -- do you still have

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1 contact with Monica Bonilla?
2 A No.
3 Q Okay. Did -- were you ever jealous because of
4 Mr. Kasparian's sexual advances towards Monica Bonilla,
5 as you described them in your testimony?
6 A No. I was shocked.
7 Q Okay. If anyone -- has anyone told you that
8 you're testifying here today because -- or you're
9 supporting whatever it is you're supporting today
10 against Mr. Kasparian because you were jealous of his
11 relationship with Monica?
12 A I suspect that that's what people that oppose
13 me speaking here will argue. But that's not the case.
14 MR. FEINBERG: Objection. Answer is
15 nonresponsive to the question.
16 BY MR. CORRALES:
17 Q Okay. And do you have any knowledge as to
18 whether or not Mr. Kasparian is having an affair with
19 Monica Bonilla?
20 A Yes.
21 Q What's that based on?
22 A It's based on the fact that a lot of people
23 have seen them at restaurants, the fact that she
24 admitted to me in Oakland in 2015 --
25 Q What did she --

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1 A -- that she was having an affair with him.
2 She admitted this to me in a hotel room in Oakland
3 during a labor council event. We were helping the
4 California Federation. They needed more volunteers, so
5 a group of us went up there.
6 Q What year was that?
7 A It was just after they first, to my knowledge,
8 had sex. I don't know if they had sex prior to that.
9 Q That was 2015?
10 A That's correct. She told me that she had
11 affairs with other older men and I shouldn't be shocked
12 that she likes power -- and he had power -- and that she
13 likes to have a sugar daddy.
14 MR. CORRALES: Okay. All right. Those are
15 all the questions I have. Thank you very much. Counsel
16 may have questions for you.
17 MR. FEINBERG: We'll have questions, but we're
18 going to take a short break.
19 MR. CORRALES: Go ahead.
20 (Recess taken.)
21 MR. FEINBERG: Back on the record.
22
23 EXAMINATION
24 BY MR. FEINBERG:
25 Q Good morning, Melody. My name is

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1 Michael Feinberg. I'm the attorney for UFCW Local 135
2 and Mickey Kasparian.
3 You're appearing here under subpoena?
4 A Is that a question or a statement?
5 Q It's a question.
6 A Yes, sir.
7 Q Who subpoenaed you?
8 A The gentleman in front of me.
9 Q Do you know his first name?
10 A First name Manuel. Last name I could look it
11 up.
12 Q Have you had anything to drink this morning?
13 A I've had water and coffee.
14 Q Any alcoholic beverages?
15 A I have not.
16 Q Did you have any alcoholic beverages last
17 night?
18 A I have not.
19 Q Okay. Have you had -- are you on any kind of
20 medication at all?
21 A Not at this time.
22 Q When was the last time you were on medication?
23 A I've never been on it. But based on the
24 behavior that your client has projected today, I may
25 have to get medication.

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1 MR. FEINBERG: Move to strike. Answer's
2 nonresponsive.
3 BY MR. FEINBERG:
4 Q Have you been on any medication in the past?
5 Let me restate the question.
6 Have you been on any medication in the past
7 for emotional issues?
8 A Never.
9 Q Okay. Have you ever used illegal drugs?
10 MR. CORRALES: Object to the question as
11 violating her right of privacy.
12 You don't need to answer a question like
13 that.
14 MR. FEINBERG: Are you instructing her not to
15 answer?
16 MR. CORRALES: I'm not instructing her at all.
17 I'm telling her she doesn't have to.
18 THE WITNESS: If the law doesn't require me
19 to, I choose not to answer that question.
20 BY MR. FEINBERG:
21 Q Well, there's no law here to instruct you one
22 way or the other.
23 Have you taken any illegal drugs?
24 MR. CORRALES: I object. Again, it violates
25 her right to privacy. And she told you she doesn't want

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1 to answer that question based upon her right of
2 privacy.
3 BY MR. FEINBERG:
4 Q So this morning before the deposition began,
5 did you spend some time talking to Mr. Corrales in his
6 office?
7 A I spoke to Mr. Corrales about the same things
8 that I spoke to with you, the rest of the people in this
9 room, yes.
10 Q So you were in there for about half an hour or
11 so?
12 A I can't recall right now.
13 Q Okay. Did Mr. Corrales tell you what the
14 nature of the lawsuit that Isabel Vasquez has brought?
15 A I'm aware of the nature of the lawsuit.
16 Q But did Mr. Corrales tell you about the nature
17 of the lawsuit?
18 A He explained why I'm here today.
19 Q Do you understand my question?
20 A Can you make it more clear so that I'm not
21 confused.
22 Q Okay. If you're confused then the question
23 is: Did Mr. Corrales tell you about the allegations
24 that Isabel Vasquez has made about Mickey Kasparian and
25 Local 135?

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1 A Mr. Corrales told me that I was here for a
2 deposition. And he told me that everything that I tell
3 him I'm going to state here on the record, which I have
4 done. That's the answer to my question.
5 Q Have you spoken to Mr. Gilleon as well as
6 Mr. Corrales at any time?
7 A What's Mr. Gilleon's first name? I want to be
8 sure we're talking about the same person.
9 Q Dan Gilleon.
10 A Yes.
11 Q When was that?
12 A I can't quite recall. Sometime within the
13 past few months.
14 Q Okay. Did you speak to him -- other lawsuits
15 were filed in December of 2016. Did you speak to
16 Mr. Gilleon during that time frame?
17 A No. The first time I spoke to Mr. Gilleon was
18 within the past two months.
19 Q Two months?
20 A Sometime within the past two months. I can't
21 recall what day. But certainly not December 2016.
22 That's a long time ago.
23 Q Okay. So in the past two months, you've
24 spoken to Mr. Gilleon -- was that on the phone?
25 A Yes.

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1 Q Was it also in person?
2 A No.
3 Q Okay. So the only communication you had with
4 Mr. Gilleon was on the telephone, right?
5 A No.
6 Q So you also communicated by e-mail?
7 A That's correct.
8 Q Or texts?
9 A That's correct.
10 Q What did you -- how many times did you speak
11 to Mr. Gilleon on the phone?
12 A I can't recall at this time.
13 Q More than once?
14 A I can't recall at this time.
15 Q Well, in the first conversation who called
16 who?
17 A I can't recall at this time.
18 Q What was discussed between you and
19 Mr. Gilleon?
20 MR. CORRALES: Objection. May violate
21 attorney-client privilege.
22 MR. FEINBERG: May or does?
23 MR. CORRALES: May. If the witness believes
24 that Mr. Gilleon -- she was seeking legal counsel from
25 Mr. Gilleon, then she's not obligated to tell you about

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1 the conversation based upon the attorney-client
2 privilege.
3 MR. FEINBERG: Are you asserting an
4 attorney-client privilege?
5 THE WITNESS: I'm a legal studies major. I'm
6 asserting it right now very explicitly, sir. I will not
7 discuss it at this time.
8 MR. CORRALES: She doesn't have to.
9 BY MR. FEINBERG:
10 Q Did you retain Mr. Gilleon as your lawyer?
11 MR. CORRALES: Doesn't matter if she retained
12 him. If she spoke with him and believed she --
13 MR. FEINBERG: Do you have an objection?
14 State the objection.
15 MR. CORRALES: And it is attorney-client
16 communication.
17 MR. FEINBERG: Fine. Say that and stop
18 talking.
19 MR. CORRALES: She does not have to give you
20 an answer to that.
21 MR. FEINBERG: She can answer whether she
22 retained him. Whether she retained him is not an
23 attorney-client issue.
24 MR. CORRALES: She can answer that question if
25 she wants.

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1 MR. FEINBERG: Thank you.
2 BY MR. FEINBERG:
3 Q Did you retain him?
4 A Again, I will not answer that question.
5 MR. CORRALES: She's entitled to say that.
6 BY MR. FEINBERG:
7 Q Is Mr. Gilleon your attorney?
8 A I will not answer that question. Please stop
9 violating my rights.
10 Q So how often do you drink alcohol?
11 A Perhaps once a month.
12 Q Has your -- have your habits concerning the
13 drinking of alcohol changed over the years?
14 A When I turned 21 I started to drink alcohol.
15 When I was a child I did not drink alcohol.
16 Q Okay. Has your habit drinking alcohol changed
17 in the last year?
18 A Not that I can recall.
19 Q Okay. So a year ago you would say you would
20 have a drink once a month?
21 A If that.
22 Q Okay. And the year before that the same?
23 A If that.
24 Q And the year before that the same?
25 A My drinking habits have been consistent since

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1 I turned 21. Approximately, if not less than, one drink
2 a month, if that. Some months I don't drink at all.
3 Q Okay. Have you ever been arrested for drunk
4 driving?
5 MR. CORRALES: Objection to the question as
6 violating her right of privacy. She does not have to
7 answer --
8 MR. FEINBERG: If she was convicted, it does
9 not violate her right of privacy.
10 MR. CORRALES: She can respond to that. But
11 my objection --
12 MR. FEINBERG: Are you advising her --
13 MR. CORRALES: No. My objection is it
14 violates her right of privacy. She can answer if she
15 wants, or she doesn't have to answer that.
16 THE WITNESS: So it's on the record, because
17 you're clearly trying to assassinate my character, I
18 have never been charged with any misdemeanors or
19 felonies nor have I ever gotten a DUI. Just so it's on
20 the record. But I will not answer questions that
21 violate my right of privacy going forward.
22 This is the tactics that your client uses to
23 attack people, and he's doing it with the wrong
24 person.
25 ///

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1 BY MR. FEINBERG:
2 Q Have people ever told you to stop drinking?
3 A No.
4 Q Have people ever told you that when you drink
5 you become out of control and delusional?
6 A Not that I can recall.
7 Q Do you know who David Garcias is?
8 A Yes.
9 Q Who is David Garcias?
10 A He's the man that colluded with your client to
11 try to kick me off the board for standing up for the
12 three sisters that have the lawsuits against
13 Mr. Kasparian.
14 Q Does Mr. Garcias have a union office?
15 A He serves on the same executive board that I
16 serve on.
17 Q Isn't he also the president of that Local?
18 A That's correct. He's the president of my
19 local.
20 Q So he's the president of SEIU Local 221,
21 right?
22 A At this time he is.
23 Q And he has been president for a number of
24 years, correct?
25 A To my knowledge.

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1 Q And isn't it true that Mr. Garcias expressed
2 concern to you about your drinking?
3 A It's true that Mr. Garcias colluded with your
4 client to try to kick me off the board for supporting
5 these women and that Mr. Garcias concocted a story so
6 that my character would be assassinated. Mr. Garcias
7 threatened to kick me off the board, along with your
8 client, if I supported these women.
9 They told me that I needed to be quiet and
10 silent. And I almost lost my executive board position
11 due to the threats. Luckily I have access to counsel.
12 So my former teachers advised me to ignore them -- my
13 former law professors.
14 MR. FEINBERG: Can I have the question read
15 back, please.
16 (Question read back by the reporter.)
17 BY MR. FEINBERG:
18 Q Could you answer the question, please.
19 A I don't recall at this time.
20 Q Isn't it true Mr. Garcias stated to you that
21 when you are drinking you become out of control and
22 delusional?
23 A I don't recall at this time.
24 Q Now, you identified someone earlier in your
25 testimony as Ariana Casonova.

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1 Do you recall doing so?
2 A I do.
3 Q Now, Ms. Casonova -- do you know her current
4 position?
5 A She resigned from her position as a political
6 organizer. So right now she's taking time off to spend
7 it with her new husband.
8 Q Well, when she was involved with -- as a
9 political organizer -- I'm sorry. For whom was she a
10 political organizer?
11 A For SEIU Local 1021.
12 Q You sure that's the Local?
13 A To the best that I can recollect at this time.
14 Q When she was a political organizer for this
15 SEIU Local, did she ever have occasion to tell you to
16 stop drinking?
17 A I don't recall at this time.
18 Q Did she tell you that when you drink you
19 become out of control and delusional?
20 A I don't recall at this time.
21 Q You identified a series of incidents involving
22 you and Mr. Kasparian. I want to -- before I go back
23 over the details, I want to be clear about the timing of
24 these events.
25 So the first incident you described was in the

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1 parking lot of Hunter Steakhouse in Mission Valley in
2 San Diego. Can you clarify exactly when this occurred
3 or reasonably close.
4 A What I told you is to the best of my
5 recollection. When I first walked in this room, I did
6 not feel anxiety. But the way you and your client have
7 acted, I'm giving the best information I can. Your
8 behavior has caused a lot of anxiety to my being. So
9 everything I've said is to the best of my knowledge that
10 I can recollect.
11 Q So when did that occur?
12 A You just stated it.
13 Q Well, did it occur -- I did not. I'm asking
14 you when it occurred.
15 A So I believe it was sometime in 2014.
16 Q Do you know at what point during the year it
17 occurred?
18 A No.
19 Q Was it in the winter of that year?
20 A It was in 2014. And that's the best
21 recollection that I can give you at this time.
22 Q Okay. When you went into Mr. Kasparian's car,
23 was it raining outside?
24 A No, it was not.
25 Q Was it -- this was in the evening, correct?

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1 A I can't recall at this time.
2 Q You don't recall if it was sunny or dark out?
3 A I can't recall at this time.
4 Q Do you recall whether it was warm or cold?
5 A I believe it was mild, but I
6 can't -- that's -- can't say that's 100 percent true at
7 this time. That's to the best of my knowledge.
8 Everything is to the best of my knowledge.
9 Q Of course it is.
10 What was the reason you were at Hunter
11 Steakhouse?
12 A Your client invited me there.
13 Q You also described an allegation in a parking
14 lot on PCH in San Diego where you also say you got into
15 Mr. Kasparian's car.
16 When did that occur?
17 A Again, sir, your behavior and your client's
18 behavior have caused a lot of anxiety to my being. So
19 at this time I can't recall. Whatever I said on the
20 record earlier is what I recall at that time. But the
21 outbursts have caused me to relive a lot of anxiety and
22 distress that your client has caused me.
23 Q Are you able to continue with this deposition?
24 A I will continue answering questions as noted
25 to the best of my knowledge.

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1 Q Well, earlier you had said that you thought
2 that incident occurred in late 2015, early 2016.
3 Do you have any more specific recollection of
4 that?
5 A Not at this time.
6 Q You said there was a union activity going on
7 and a march.
8 Do you recall saying that?
9 A Yes.
10 Q Do you recall what the union activity or march
11 was about?
12 A I don't. But most of those marches are social
13 justice-related to uplift workers.
14 Q Okay. But there are a lot of different issues
15 that fall within that umbrella.
16 A That's true. Like attacks against women and
17 sexual harassment. There's a lot of different --
18 Q There's also the Fight for \$15, for example.
19 A There is a lot.
20 Q Do you recall what was going on at that time?
21 A Not at this time.
22 Q Okay. You described an incident where you
23 were at Mr. Kasparian's office.
24 Do you recall when that occurred?
25 A Not at this time.

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1 Q So you don't know?
2 MR. CORRALES: Objection. Asked and answered.
3 She described it earlier in her deposition.
4 MR. FEINBERG: She did not identify when it
5 occurred earlier.
6 MR. CORRALES: I think she did.
7 MR. FEINBERG: She did not.
8 THE WITNESS: Everything I stated is to the
9 best of my knowledge.
10 BY MR. FEINBERG:
11 Q I understand that. But you didn't say that
12 before, so we don't know when that occurred.
13 A We'll check that when we see the transcript,
14 sir.
15 Q Thank you for that instruction.
16 So the next incident you described was the
17 situation at the -- I believe it's the Hilton Bay Front
18 Hotel; is that right?
19 A The Hilton -- I don't know the exact name of
20 it. It's on One Park Place.
21 Q And that was in or about April of 2015,
22 correct?
23 A Yes.
24 Q How are you able to be specific about that?
25 A Very good question. Because at that time the

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1 April 15th, April 16th date was something that Mickey
2 was really looking forward to. He had reminded me
3 multiple times to make sure I could organize the women
4 to meet at the hotel. Your client really wanted to meet
5 with the four of us.
6 Q It wasn't just April 2015; it was April 15th
7 or 16th?
8 A Approximately, April 15th or 16th.
9 Q Okay. Thank you.
10 You described a circumstance where you claim
11 Mr. Kasparian was masturbating on the phone, and you
12 said that that occurred in 2015.
13 Do you have any way to be more specific as to
14 when in 2015 that occurred?
15 A That's the best that I can recall at this
16 time.
17 Q And then there's the incident at the -- in the
18 parking lot at Corner Bakery in Mission Valley.
19 When did that occur?
20 A Whenever I stated --
21 Q But you didn't.
22 A -- earlier.
23 Q But you didn't.
24 A Well, I stated everything to the best of my
25 knowledge.

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1 Q But you weren't asked when it occurred.
2 So when did it occur?
3 A I don't recall at this time.
4 Q Maybe this will help: The incident at the
5 parking lot on PCH that you say occurred in late 2015,
6 early 2016, did that occur before or after the incident
7 in Mr. Kasparian's office?
8 A I can't recall at this time.
9 Q Okay. Did it occur before or after the
10 incident at the hotel?
11 A I can't recall at this time.
12 Q Did the incident at the parking lot at the
13 Corner Bakery in Mission Valley occur before or after
14 the incident at the hotel?
15 A I can't recall at this time.
16 Q Okay. So you said that you first came into
17 contact with Mr. Kasparian online?
18 A That's correct.
19 Q How did that come about?
20 A I read an article about him. I read that he
21 fought for workers and that he was helping uplift
22 working families. So I reached out to him and thanked
23 him for what he did. And I believe we talked about
24 politics a little bit.
25 Q Did you say that you admired how he stood

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1 behind an underdog like David Alvarez?
2 A I don't recall at this time. But I did admire
3 your client at some point.
4 Q Okay. During the -- do you know what the
5 Fight for \$15 campaign is?
6 A I'm familiar with it.
7 Q For the record, can you tell us what you
8 understand it to be.
9 A It's a fight to uplift wages -- to uplift the
10 wage floor for all workers so that all workers in our
11 country can make living wages and have safe working
12 environments.
13 Q What does the 15 refer to?
14 A The 15 refers to the notion that if you
15 gradually lift wages to a certain threshold -- 15 being
16 that threshold -- that the rest of the wage floor will
17 lift. But it's more of a symbolic thing. It doesn't
18 mean all places will have 15.
19 Q In connection with the Fight for \$15 campaign,
20 was there an incident at a Burger King restaurant in
21 2014 that involved you and Mr. Kasparian?
22 A There was.
23 Q What occurred?
24 A Mr. Kasparian pushed a gentleman that tried to
25 hurt me.

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1 Q Why would someone try to hurt you? Do you
2 know?
3 A Because I was standing up for workers and I
4 wouldn't put my camera down. We were having a
5 demonstration in there. For the record, I did admire
6 your client at that time before --
7 Q I'm sorry. Did you finish your sentence?
8 A Yes. I was going to say before he did the
9 things that he did to me.
10 Q So in that particular instance he came to your
11 assistance?
12 A In that particular instance he did what any
13 man with basic human decency would do.
14 Q Which was what?
15 A He did what he should have been doing all
16 those years, protecting a woman instead of assaulting
17 us.
18 Q What specifically did he do?
19 A He pushed the guy.
20 Q To prevent him from doing something?
21 A Yes. To prevent him from hurting me. The guy
22 was going to hit me, but I wouldn't put the camera down.
23 Q So he pushed him out of the way?
24 A Yes.
25 Q At some point did you become Facebook friends

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1 with Mickey Kasparian?
2 A Yes.
3 Q And why was that?
4 A He requested me as a friend.
5 Q And when did that occur?
6 A I can't recall at this time.
7 Q How often would you say you sent him messages
8 while you were Facebook friends?
9 A It was sporadic. Sometimes he would message
10 me a lot. Sometimes I would message him.
11 Q And this was using Facebook Messenger?
12 A It was a series of communication methods,
13 including Facebook Messenger, Yahoo Messenger, text
14 messages, over the phone.
15 Q So you had a lot of contact with
16 Mr. Kasparian?
17 A He created an account on Yahoo Messenger
18 because he felt safe communicating there. I imagine he
19 didn't want our conversations to be public.
20 Q And you have records of these conversations?
21 A I can't recall at this time.
22 Q Well, when was the last time you looked at
23 your Yahoo Messenger account?
24 A I can't recall at this time.
25 Q Did you ever cause your Yahoo Messenger

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1 account to be deleted?
2 A I can't recall at this time.
3 Q I'm sorry. You don't know if you deleted it?
4 A I can't recall at this time.
5 Q Okay. So let's talk about this first incident
6 that occurred at Hunter Steakhouse that you described.
7 You met at the restaurant; you came separately
8 to the restaurant; is that correct?
9 A We drove separately, that's correct.
10 Q And did you have a meal inside the restaurant
11 together?
12 A It depends what you define as a meal.
13 Q Well --
14 A Was it a three-course meal? Was it -- but we
15 had -- to the best of my knowledge, based on my best
16 recollection, we had an appetizer.
17 Q Were you at the bar or the restaurant itself?
18 A We went downstairs to what appeared to be a
19 bar area that he was well acquainted with since the
20 waitress seemed to know him.
21 Q You've never been there before yourself?
22 A No.
23 Q So you went to the bar and you ordered
24 appetizers? Yes?
25 A He ordered.

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1 Q Did you eat?
2 A I believe so.
3 Q Okay. And were drinks ordered?
4 A He ordered drinks. I had one beer.
5 Q Okay. And when you finished your appetizers
6 and beer, what happened next?
7 A He talked about his political power. He
8 talked badly about Lorena Gonzalez, Olga Diaz, women.
9 Q When he talked about Olga Diaz, he was talking
10 about her support for Wal-Mart, right?
11 A He didn't specify. But he hated her.
12 Q Because she supported Wal-Mart, right?
13 A That's a question you would ask your client,
14 not me.
15 Q Because you don't know?
16 A He expressed hatred towards her and distaste
17 towards Lorena Gonzalez.
18 Q And what did you say during this conversation?
19 A I was listening to him.
20 Q You weren't agreeing with his comments?
21 A I didn't know the women, so there was not much
22 I could say.
23 Q Are you new to San Diego?
24 A It depends what you define as new.
25 Q How long had you lived here in -- how long had

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1 you lived in San Diego as of 2014?
2 A I've lived here -- I lived here in 2014.
3 Q How long had you lived in San Diego before
4 2014?
5 A I believe, to the best of my knowledge, that I
6 moved to San Diego in 2010.
7 Q So for at least four years you had been living
8 in San Diego at that time?
9 A Since 2010 I've been living in San Diego.
10 Q So between 2010 and 2014 that's four years,
11 right?
12 A Yes.
13 Q And you were a union activist at the time in
14 2014?
15 A It depends what you would call activist.
16 Q Would you call yourself a union activist?
17 A I would call myself a fighter of the working
18 class.
19 Q Were you active in your union at the time?
20 A I participated in events.
21 Q Did you organize any of those events?
22 A It depends what you consider organize. If I
23 invite one person, is that organize? It depends.
24 That's a relative question.
25 Q Were you assigned to do anything to get those

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1 events set up?
2 A I worked for the county, so the union cannot
3 assign anything to me. Everything that I did, to the
4 best of my knowledge, was volunteer.
5 Q Were you asked to do anything to set up any
6 union events?
7 A I can't recall at this time.
8 Q Okay. So when you finished at the restaurant,
9 what happened next?
10 A Your client lured me to his car.
11 Q What did he say?
12 A Let's go in my car.
13 Q How is that luring?
14 MR. CORRALES: Objection. Argumentative.
15 THE WITNESS: He grabbed my arm and pulled me
16 towards his car.
17 BY MR. FEINBERG:
18 Q That's more than just luring. So he grabbed
19 your arm and pulled you to the car.
20 Were you protesting?
21 A I resisted at first.
22 Q Why did you stop?
23 A Because I feared your client.
24 Q What did you fear he was going to do at that
25 time?

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1 A Everything I said earlier.
2 Q So let me be clear. You leave the restaurant;
3 and up until that time Mr. Kasparian has not at all come
4 on to you, right?
5 A He hit on me multiple times during the
6 conversation in the restaurant.
7 Q Really? What did he say during the
8 conversation? Because you didn't mention that yet.
9 A It wasn't asked. You're asking me just now.
10 Q I asked what you talked about. You said he
11 talked politics.
12 Now you're saying he hit on you.
13 MR. CORRALES: Objection. Misstates
14 testimony. Argumentative. No question pending.
15 BY MR. FEINBERG:
16 Q So what did he say to you?
17 A He admired what he called my beauty.
18 Q How did you respond to that?
19 A I said thank you, just like if anyone else
20 said.
21 Q Besides that what else did Mr. Kasparian say
22 that you think was him hitting on you?
23 A The way he was looking at me, the way he
24 wanted me to drink more alcohol.
25 Q But you only had one beer?

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1 A Correct.
2 Q Anything else that Mr. Kasparian did to hit on
3 you during that -- during your time in the restaurant
4 there?
5 A He wanted me to sit closer to him.
6 Q How did he indicate that?
7 A Because he said, Sit closer to me.
8 Q Did you?
9 A No.
10 Q Okay. Anything else?
11 A Not that I can recall under these
12 circumstances at this time.
13 Q Do you feel you have diminished recollection
14 right now?
15 A I feel that your behavior has caused a lot of
16 distress for me --
17 Q Are you able --
18 A -- and that of your client.
19 Q Are you able to continue this deposition?
20 A Absolutely.
21 Q But you can't recall things because of what
22 you claim is my behavior?
23 A Because of your behavior and your client's
24 behavior my being feels anxiety.
25 Q Do you take any medication for anxiety?

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1 A Never. I'm not used to men bursting out in
2 anger against me and pounding the table.
3 Q That assumes someone pounded the table, which
4 didn't happen.
5 MR. CORRALES: Yes, it did.
6 THE WITNESS: There was vibration on the
7 table, sir.
8 MR. CORRALES: I saw it happen.
9 MR. FEINBERG: Then you're making it up as
10 much as she is. You're lying about it right now. It
11 didn't happen.
12 Is that funny?
13 MR. CORRALES: It is funny. I think it's
14 funny that a lawyer would lie like that.
15 MR. FEINBERG: It's astonishing to me as
16 well.
17 BY MR. FEINBERG:
18 Q So you're saying he dragged you to the car?
19 A I never used those words. That's you.
20 Q So he put his hand on your arm and pulled you
21 to the car?
22 A I said he lured me to the car.
23 Q You said he put his hand on your arm, right?
24 A That's what that would mean.
25 Q And you didn't resist?

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1 A At first I did.
2 Q What does that mean?
3 A That means I moved my body the opposite
4 direction that he's pulling me away from his car.
5 Q But you didn't let go? Is that what you're
6 saying?
7 A That's true.
8 Q Did he take you over to the passenger seat of
9 the car and push you in?
10 A He took me over to the passenger seat and made
11 me feel like I was under duress and placed me on the
12 seat.
13 Q He physically placed you on the seat?
14 A He opened the door and placed me on the seat.
15 Q He opened the door.
16 Did you get in?
17 A Yes.
18 Q So he didn't place you on the seat, did he?
19 A If he touched my body and places my body
20 somewhere, whether I move my leg or not, he's thereby
21 moving my body with me. My body was not the only thing
22 moving. He placed me -- had he not been touching me he
23 wouldn't have placed me. But by touching me he's
24 contributing to me sitting there. I felt like I didn't
25 have a choice but to sit in there.

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1 Q Why didn't you scream?
2 A Because there could be ramifications if you
3 don't submit to Mickey Kasparian. I feared your client.
4 Q How are you aware of such ramifications as of
5 this time?
6 A A lot of sporadic incidents, a lot of common
7 knowledge.
8 Q So how is this person who you believe at that
9 moment was -- had already crossed the line, right, by
10 the time you got to the car -- would you say that he had
11 already crossed the line by the time you got to the car?
12 A I don't know whether I would say that. I
13 would say that depends what his intentions were. But
14 for me his intentions became malicious once he groped my
15 genitals.
16 Q But before that occurred -- or allegedly
17 occurred, you have said that you felt that he was your
18 mentor?
19 A I saw him as a mentor and a friend.
20 Q Even as of that moment when you went to the
21 car you saw him as a mentor and a friend; is that right?
22 A Before he touched my genitals, I saw him as a
23 mentor and a friend.
24 Q Okay. So you get in the car, and he walks
25 around to the other side of the car, right?

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1 A Yes.
2 Q And you don't get out of the car while he's
3 walking away.
4 How come?
5 A Because I was afraid of your client.
6 Q Okay. So you sit in the car, and at this
7 point you said that he touched you in various places,
8 correct?
9 A That's correct.
10 Q You're in the car, you said, for 10 minutes?
11 A Approximately.
12 Q Ten minutes is -- how soon after you got in
13 the car did he touch you?
14 A Probably within a minute or so.
15 Q So did he continue to touch you throughout the
16 remaining eight or nine minutes?
17 A He had his hand on my leg when he, I imagine,
18 realized that I would not consent to his sexual
19 unwarranted advances -- unconsensual advances.
20 Q And after -- at what point in time do you
21 decide I'm going to get out of the car? What happened
22 that you decided, okay, now I'm going to get out?
23 A When I felt that my safety was compromised.
24 Q Did you feel your safety -- haven't you
25 expressed that your safety was compromised when he took

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1 you over to the car?
2 MR. CORRALES: Objection. Misstates her
3 testimony. She never said that.
4 BY MR. FEINBERG:
5 Q Isn't that true?
6 A I said that your client repeatedly has
7 exhibited systemic patterns of inappropriate,
8 unconsensual behavior toward me.
9 Q But as of then, as of that moment he's taking
10 you over to the car, you felt coerced you said, right?
11 A Yes.
12 Q Did you feel unsafe?
13 A Once my genitals were touched, I felt scared,
14 assaulted, hopeless, fearful.
15 Q Why didn't you get out of the car right there
16 and then?
17 A Again, earlier you said you don't pound the
18 table. You just did it right now, sir. That is the
19 same pattern that abusive men use to scare us. Stop it.
20 Q That's nonsense.
21 MR. CORRALES: Whoa, whoa, whoa. That's not
22 nonsense. I saw you pound the table.
23 MR. FEINBERG: I didn't pound the table. I
24 touched the table.
25 MR. CORRALES: You're a liar. You know that?

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1 Right now you just lied. She saw it and said for you to
2 stop it.
3 MR. FEINBERG: Counsel, you are really looking
4 for a state bar complaint.
5 MR. CORRALES: Well, what are you going to do?
6 You going to file a complaint to the state bar against
7 me? Is that part of the intimidation that your clients
8 want you to do, to file a state bar complaint against
9 me?
10 MR. KASPARIAN: Don't bring me into this
11 because --
12 MR. FEINBERG: Don't say anything.
13 MR. CORRALES: I'm actually aghast. I think
14 I'm going to go ex parte and have you explain to the
15 judge why you want to file a state bar complaint against
16 me.
17 MR. FEINBERG: Go ahead.
18 MR. CORRALES: I will. You'll get notice
19 about that.
20 MR. FEINBERG: I'm sure I will.
21 MR. CORRALES: You're being very, very
22 unprofessional. No one says that. In fact, that's a
23 state bar complaint itself by threatening somebody to
24 file a state bar complaint against them.
25 MR. FEINBERG: No, it isn't.

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1 MR. CORRALES: Well, you better check your law
2 books, young man, because that is true.
3 BY MR. FEINBERG:
4 Q Why didn't you get out of the car when
5 Mr. Kasparian put his hands, as you claim, on your
6 genitals?
7 A Because I felt fear, the way you made me fear
8 right now when you pounded the table. Men make women
9 fear them when they project that type of aggressive --
10 passive/aggressive behavior and lie about it the way you
11 just lied right now.
12 Q So at some point during that time, did you
13 feel safe to leave?
14 A About 10 minutes into that incident I left.
15 Q What happened that made you safe enough to
16 leave?
17 A I wouldn't say it was safe enough to leave. I
18 feared for my safety, and that's why I left. I don't
19 think at any point any woman is safe around a man that
20 makes unwarranted sexual advances toward them.
21 Q I want to understand why you didn't leave at
22 five minutes, four minutes, six, seven, eight, nine
23 minutes instead of tolerating that and not getting out.
24 A I will tell you why and look you in the eye,
25 sir. A lot of men use body language, words,

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1 passive/aggressive behavior to scare woman of them the
2 way you've been doing it here and your client has been
3 doing it. They're not used to women like me that stand
4 up and don't fear for their jobs. Because I'm a public
5 servant, my number one job is to make sure that I serve
6 the public with grace, even if I come under fire the way
7 your client has tried to attack me.
8 So women fear men like you, like your client,
9 people that try to make us be silent. You paralyze us.
10 You shut us down. You slam your hand on tables. You
11 threaten attorneys. That's why I will tell the judge
12 under penalty of perjury that you did it right next to
13 me. You're a disgrace to attorneys.
14 Q Thank you.
15 So at what point did you feel safe enough to
16 get out of the car?
17 A I did not feel safe at any point during that
18 incident, but I left about 10 minutes into it.
19 Q Okay. So the second incident you described is
20 at a parking lot on PCH when there was a union activity
21 going on and a march.
22 This is a year or so after the first incident,
23 correct?
24 A I can't recall at this time. I do want to
25 clarify that the union activity in San Diego -- there's

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1 a lot of activity that are collaborations between
2 different organizations. So when I say union activity,
3 doesn't always mean my union per se held this event. I
4 just want to clarify that.
5 Q Thank you.
6 And after the event he offered you a ride back
7 to where your car was parked?
8 A Correct.
9 Q Why did you get in the car?
10 A Because I didn't want to walk several miles to
11 my car. At that point I didn't know how far I was from
12 my car, but it felt like it was several miles.
13 Q But given what had happened -- what you say
14 had happened in his car before, why would you get in his
15 car again?
16 A Because I thought that his behavior was a one
17 time thing.
18 Q Okay. How long were you in the car this time
19 after Mr. Kasparian allegedly started touching you?
20 A I don't recall. I believe it was about
21 15 minutes. I don't quite recall.
22 Q 15 minutes this time.
23 A Again, sir, I said I don't quite recall. I
24 believe it was about 15 minutes. When you're saying
25 this time, a lot happened since I last spoke. You had

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1 numerous outbursts and things of that nature.
2 Q So earlier you described being -- the first
3 incident being in the car for 10 minutes; now you're
4 saying that the second incident involved 15 minutes.
5 You didn't think it was going to happen again.
6 But when it started, did you ask him to stop
7 the car and let you out?
8 A The car was parked, sir, when it happened.
9 Q Why didn't you get out?
10 A Because I felt paralyzed. I felt fear take
11 over my body.
12 Q And at the end of 15 minutes, did you no
13 longer feel paralyzed?
14 A At the end of 15 minutes, I felt violated. I
15 felt assaulted. I felt hopeless.
16 Q And did you feel safe enough to get out of the
17 car?
18 A I never felt safe during that interaction.
19 Q Then why did you get out of the car at all?
20 A Because I imagine if I stayed longer he might
21 proceed to do more things.
22 Q So now you talked about an incident in
23 Mr. Kasparian's office.
24 You don't know when this occurred before or
25 after that second car incident?

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1 A I can't recall at this time.
2 Q Well, there was a political meeting you said
3 at Local 135.
4 A I never said that, sir.
5 Q There was a political event that proceeded
6 your going up to his office; is that correct?
7 A I said, to the best of my knowledge, there was
8 some kind of political or union event.
9 Q Where did that occur?
10 A I don't recall at this time.
11 Q Where were you parked?
12 A When?
13 Q When you went up to his office, where were you
14 parked?
15 A In his parking lot at UFCW Local 135 right
16 outside in the office in the private parking lot.
17 Q Did you have to drive there from the political
18 event?
19 A I had to drive there from whatever event
20 proceeded. And I'm not 100 sure it was a political
21 event. But to the best of my knowledge, it was. And,
22 yes, we met up there.
23 Q Okay. Why did you go back to his office in
24 the first place?
25 A Because I thought he was my friend and I saw

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1 him as a mentor.
2 Q By your testimony Mr. Kasparian has come on to
3 you, made unwanted advances, and has physically accosted
4 you.
5 And you still thought of him as your friend
6 and mentor; is that correct?
7 A Mr. Kasparian is a good manipulator. He knows
8 how to talk his way out of situations. He knows how to
9 make stories up. In fact, he even makes fake profiles
10 to befriend people and make lies.
11 MR. FEINBERG: Could I have that last question
12 read back, please.
13 (Question read back by the reporter.)
14 BY MR. FEINBERG:
15 Q Please answer the question.
16 A I think in my heart I always see the best in
17 people. And Mr. Kasparian had expressed on numerous
18 occasions that he cared about workers. And a part of me
19 was hopeful that the previous incidents were isolated.
20 Q What was the purpose of your going back to his
21 office?
22 A That's what you would ask your client. I
23 don't know.
24 Q What was your purpose --
25 A Spending time with my friend, spending time

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1 with my mentor.
2 Q So the two of you went up the back stairway to
3 his office; is that right?
4 A Yes.
5 Q This was after hours?
6 A Yes.
7 Q Okay. And Mr. Kasparian used his key to get
8 in the building?
9 A I don't know if it was his key or somebody
10 else's.
11 Q He used a key to get in the office?
12 A Yes.
13 Q Did you see him turn off the building alarm?
14 A I don't recall at this time.
15 Q When you went into his office, this was the
16 first time you had ever been there?
17 A The first time I had been in his office, not
18 the building itself.
19 Q Okay. And how did you observe the secretary
20 area?
21 A Seemed like it was cornered off.
22 Q Could you observe it physically from where you
23 were standing --
24 A When I walked around his office, I was able to
25 get a closer look. But I was more focused on the

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1 pictures he was showing me and the awards that he had
2 won.
3 Q Okay. You said that you were sitting on the
4 couch and the TV was on?
5 A At one point we sat on the couch.
6 Q And the TV was on?
7 A He turned on the television.
8 Q What was on the television?
9 A I can't recall at this time.
10 Q Do you know why he turned on the television?
11 A I don't know. That's what you would ask your
12 client.
13 Q Was there any discussion about what you would
14 watch?
15 A No.
16 Q So you said that Mr. Kasparian poured a glass
17 of whiskey.
18 Did you have anything?
19 A I didn't say he poured a glass. I said he had
20 whiskey. I don't know if he poured a glass or not. I
21 did not.
22 Q If he didn't pour a glass, how did he take the
23 whiskey?
24 A I don't recall at this time. But he drank
25 whiskey. I don't know if he drank it from the bottle.

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1 That's what you would ask him.
2 Q Did you see him drink the whiskey?
3 A Yes.
4 Q How was he drinking it?
5 A I can't recall at this time. I don't recall
6 if he drank it out of a wine glass or a Dixie cup or a
7 plastic bottle. I can't recall at this time. I
8 remember something in his hand and him pouring it into
9 something. I don't know if it was a cup, a bowl. I
10 can't recall at this time.
11 Q At some point during this incident you say he
12 pinned you down on the sofa.
13 How did that actually physically take place?
14 A Just before we were leaving he turned off the
15 light and he grabbed my body and pinned me against the
16 edge of the sofa.
17 Q So he grabbed --
18 A In other words, I didn't have control over my
19 own body.
20 Q He grabbed your body where?
21 A My buttocks and my breast.
22 Q So how were his hands placed then?
23 A All over.
24 Q His hands were moving around?
25 A Yes, to the best of my knowledge.

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1 Q Well, when he pinned you down on the couch,
2 where were his hands?
3 A All over my body. At one point they were on
4 my buttock to control my body. And another point his
5 hands were touching my breast -- outside of my breast.
6 Q So when you were pinned down to the couch, his
7 hands were under you between you and the couch?
8 A His hands were all over my body.
9 Q What was holding you to the couch?
10 A The edge of the couch.
11 Q But above you what was holding you down?
12 A He was holding me, sir.
13 Q So he was on top of you?
14 A Yes.
15 Q Okay.
16 A That's how he pinned me down with his body.
17 Q But you weren't laying down?
18 A Correct, I was not. I did not want to get
19 raped.
20 Q Well, you're saying he pinned you down; so it
21 wasn't voluntary anyway, right, according to you?
22 A You're asking an irrelevant question.
23 Q I don't think so. You're the one who told
24 this story.
25 A You're creating your own facts, sir. I never

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1 said what you said.
2 Q You said he pinned you down on the sofa. I'm
3 trying to find out how that occurred.
4 How did that occur?
5 A The way I just told you.
6 Q So you don't remember how he held you down?
7 MR. CORRALES: Objection. Misstates her
8 testimony.
9 MR. FEINBERG: Because she hasn't answered
10 that question.
11 MR. CORRALES: I think she did. But she can
12 answer again if she wants to or she doesn't have to.
13 She answered the question.
14 MR. FEINBERG: Please stop instructing the
15 witness.
16 MR. CORRALES: I'm not instructing anybody.
17 I'm just objecting on the grounds that it was asked and
18 answered.
19 MR. FEINBERG: That's not an appropriate
20 objection in this setting.
21 MR. CORRALES: I'm sorry. It is.
22 BY MR. FEINBERG:
23 Q So he pinned you down and then he let you go?
24 A I resisted. And I said, You can get in
25 trouble for this.

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1 Q But you never reported this incident to
2 anybody, right?
3 A No, I did not.
4 Q Did you tell anybody about the incident?
5 A I can't recall at this time.
6 Q Going back to the first incident in the car at
7 Hunter Steakhouse, did you tell anybody about that
8 incident?
9 A I can't recall at this time.
10 Q And the incident that occurred on PCH, did you
11 tell anybody about that incident?
12 A I guess -- it would depend on when.
13 Q Ever.
14 A Well, obviously at some point, because we've
15 had this deposition, right?
16 Q Up until the first time you spoke to
17 Mr. Gilleon a couple months ago, did you tell anybody
18 about that incident?
19 A I did not explicitly state the details of that
20 incident.
21 Q And so who did you not explicitly state the
22 details of the incident?
23 A I can't recall at this time.
24 Q You told somebody but you don't know who?
25 A I recall being implicit about what happened.

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1 Q Who to?
2 A To a number of people.
3 Q Identify them for us.
4 A During a democratic labor den meeting, I
5 implied that I might be involved in the Kasparian
6 situation.
7 Q You might be involved with Kasparian?
8 A Correct.
9 Q Who did you imply that to?
10 A To whomever was sitting there at that meeting.
11 Q Who was that?
12 A I can't recall at this time. I can't memorize
13 dozens of names.
14 Q You told dozens of people?
15 A I told dozens of people that I might be
16 involved in the Kasparian situation.
17 Q Did you feel that that was a private matter
18 between you and Mickey?
19 A You just asked me if I tried to tell anybody.
20 I want to make sure people are safe and that people are
21 aware.
22 Q But what you're describing -- the words you're
23 using you were involved with Mickey. But what you
24 described of the events doesn't sound like an
25 involvement. Did you feel --

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1 A I think you're turning my words. When I say
2 "involved," sir, I'm saying that I have experience. The
3 implications and the allegations against your client --
4 not only experience but seeing those allegations.
5 That's what I have said.
6 Q So when did that occur?
7 A Sometime between April 2017 and today.
8 Q So up until April 2017 you told nobody about
9 any of your interactions of a sexual nature with
10 Mr. Kasparian; is that right?
11 A That's not right. I can't recall at this
12 time.
13 Q Is there anyone who can corroborate your story
14 about your interaction with Mr. Kasparian? I'm not
15 going to include the incident at the Hilton because
16 there were other people there. We'll come back to that.
17 But other than that incident, is there anyone
18 who could corroborate your story?
19 A I can't recall at this time. And this story
20 may develop. Who knows what witnesses will be called.
21 So I don't know, sir.
22 Q I'm only asking you what you know.
23 A I'm telling you I can't recall, to the best of
24 my knowledge.
25 Q Okay. In early 2015 didn't you ask

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1 Mr. Kasparian if he would be interested in having
2 Local 135 once again sponsor the Fiesta Del Sol event?
3 A Yes.
4 Q Didn't he tell you about past challenges that
5 the Local had concerning the event taking Wal-Mart
6 money?
7 A I can't recall at this time.
8 Q At that point during your conversation about
9 the Fiesta Del Sol event, didn't you tell him he should
10 meet Monica Bonilla, who was a member of SEIU 221 and
11 the coordinator of that event?
12 A She was not the coordinator. She sat on the
13 board at the time, to the best of my knowledge, of the
14 organization. I believe it was called Justice
15 Overcoming Boundaries.
16 Q Did you suggest he should meet with her to
17 talk about the event?
18 A I can't recall at this time.
19 Q So you described an event at the Hilton on the
20 Bay. That's how you put it.
21 Did you become aware that Mr. Kasparian was at
22 a union event at that hotel that evening?
23 A I don't recall at this time.
24 Q Did you ask him if you could come by for
25 drinks and could Monica Bonilla attend so they could

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1 meet one another?
2 A No. He wanted to meet with the four of us
3 ahead of time. He had been looking forward to that.
4 Q You say he wanted to have a foursome?
5 A Correct.
6 Q You understood what a foursome was, right?
7 A Yes.
8 Q Why go?
9 A To protect my friend Alicia Nichols.
10 Q Why not tell her not to go?
11 A Mickey implied that he could recommend her to
12 SEIU 1000, and she was seeking employment at that Local.
13 So I wanted to be there to support her. I felt that
14 they would meet with me or without me. I'd rather be
15 there to make sure he didn't do anything to her.
16 Q So you went -- I want to be clear. You went
17 to the hotel knowing in your mind that Mr. Kasparian
18 wanted to have a foursome with you and Alicia and
19 Monica; is that true?
20 A I went there knowing that he wanted to meet
21 with the four of us. He said that he wanted to have a
22 foursome. I did not believe that we would have a
23 foursome. I thought that I would be able to leave the
24 hotel with Alicia to ensure that she was safe after we
25 hung out.

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1 Q Didn't you spend most of the evening at the
2 bar talking to Monica?
3 A No. The four of us spent most of the evening
4 together at the bar. Mickey was focused on Monica.
5 Alicia and I were talking. We sat in a group of four in
6 a little booth area that's cornered off.
7 Q How much did you have to drink?
8 A I believe I had one or two drinks over the
9 approximately three hours we were there.
10 Q Isn't it true that you got drunk?
11 A Absolutely not.
12 Q Okay. Isn't it true that Mr. Kasparian
13 offered you a room that he got comped by the hotel so
14 that you wouldn't have to drive home or that you could
15 take a cab?
16 A It's true that Mr. Kasparian got a room. I
17 don't believe his intent was to give me the room so I
18 wouldn't drive. My understanding of the situation is
19 that he got it because he wanted to have a foursome and
20 drink in the room with the three of us -- me, Alicia,
21 and Monica.
22 Q Isn't it true Mr. Kasparian told you he wasn't
23 going to use the room because he was going home and you
24 should use the room because you had been drinking?
25 A I don't recall that.

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1 Q Isn't it true that Mr. Kasparian never went up
2 to the hotel room and you did on your own?
3 A That's completely false. He took us to the
4 rooms. He even showed me the second room. We were only
5 in the second room for about a minute. But the suite
6 itself -- all four of us walked into that suite
7 together. He directed us to that suite. Alicia Nichols
8 was there and I was there and Monica Bonilla was there
9 and Mr. Kasparian was there. He directed us to that
10 room.
11 His intent was to have a foursome with us. My
12 intent was to make sure my friend was okay and to
13 ensure, whether or not he recommended her to SEIU 1000,
14 that her safety was not compromised. That's what
15 sisterhood is in labor unions.
16 Q So sisterhood wouldn't be telling Alicia not
17 to go to the hotel at all so that she wouldn't be in the
18 situation in the first place; is that right?
19 A I never said that.
20 Q I'm asking you.
21 A I'm telling you I never said that.
22 Q So did you think that?
23 A I never thought that.
24 Q Okay. So you never thought to tell Alicia
25 don't go; he wants to have a foursome?

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1 A I knew how perverted your client was and how
2 much of a manipulator he was and how much he uses his
3 influence to influence women and tell them he can help
4 with their careers. So I knew early on he was going to
5 meet with Alicia whether I was there or not.
6 So my goal was to ensure she's safe. And I
7 would do that no matter what. So that's why I went. It
8 occurred to me he was going to meet her with or without
9 me. My concern was her safety.
10 Q You didn't believe that Alicia would believe
11 you?
12 A I never said that.
13 Q I'm asking you.
14 A You made it sound like a statement. So I want
15 it on the record that I never said that, sir.
16 Q Did you believe Alicia wouldn't believe you if
17 you told her Mickey wanted to have a foursome?
18 A I don't recall having that thought. But
19 Alicia knows my character, and I believe that she would
20 believe anything that I said based on my actions.
21 Q So Mickey told you he wanted to have a
22 foursome.
23 Did he mention he wanted to have a foursome
24 with Alicia?
25 A Yes.

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1 Q Did he know Alicia?
2 A Yes.
3 Q Did you invite Alicia to that event?
4 A Mickey asked me to invite Alicia to meet up
5 with him and Monica.
6 Q And you agreed to do so?
7 A I informed Alicia that Mickey wanted to meet
8 with the three of us.
9 Q So you said that the day after this event you
10 got a text from Mickey Kasparian the next morning; is
11 that right?
12 A That's correct.
13 Q And that in that text he, in some fashion,
14 acknowledged having oral sex with Monica Bonilla?
15 A That's correct.
16 Q Do you still have that text?
17 A Not that I can recall.
18 Q Okay. Isn't it true that a few weeks after
19 this alleged event you texted Mickey with words to the
20 affect of, How do you like Monica; I want to watch the
21 two of you together?
22 A I don't recall at this time.
23 Q Isn't it true approximately two years ago you
24 claimed you had a sexual relationship with Joanna Stuart
25 at SEIU 221?

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1 A I don't recall at this time.
2 Q Did you have a sexual relationship with
3 Joanna Stuart at SEIU Local 221?
4 MR. CORRALES: Objection. Right of privacy.
5 She doesn't have to answer questions about her private
6 sexual life. And it's up to her to answer if she wants
7 to.
8 BY MR. FEINBERG:
9 Q Is it true?
10 A I choose not to answer that question.
11 Q Isn't it true while drunk in 2015 you were
12 hitting on Kristin Clemens from SEIU?
13 MR. CORRALES: Same objections. Right of
14 privacy. It's up to her to answer if she wants to.
15 BY MR. FEINBERG:
16 Q Isn't that true?
17 A I don't recall that at this time.
18 Q Okay. Did you later text Kristin Clemens
19 saying you wanted to hookup with her?
20 MR. CORRALES: Same objections. Violates her
21 right of privacy.
22 THE WITNESS: I'm not answering anything that
23 violates my rights.
24 BY MR. FEINBERG:
25 Q That assumes facts not in evidence. But okay.

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1 Did you attend the September 2014 Labor Day
2 breakfast in San Diego?
3 A State the date again, sir.
4 Q September 2014.
5 A What hotel was it at?
6 Q Well, this would have been a breakfast in
7 which Mr. Garcias brought you over to sit with
8 Local 135.
9 Do you recall that?
10 A There were a lot of events. I can't recall at
11 this time.
12 Q Do you recall sitting next to Mr. Kasparian
13 and Maribel McKinzie?
14 A Again, sir, there were a lot of events. If I
15 answered that, I would be speculating. I don't recall
16 at this time. I have been to a number of events in the
17 past. Whether it's breakfast, dinner, there have been
18 multiple events over the many years that I've been
19 involved.
20 Q There's only one Labor Day breakfast a year,
21 right?
22 A But I've sat at many events, so I can't
23 100 percent confirm or deny that with certainty.
24 Q Do you recall saying at such a Labor Day event
25 to Mr. Kasparian that you don't like Sandy Naranjo?

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1 A Absolutely not.
2 Q Do you recall saying that she is a bitch?
3 A Absolutely not.
4 Q Do you recall saying that she is a
5 manipulator?
6 A Absolutely not. Everything you told me is
7 something your client has said to me. He's turning it
8 and saying that I said that. I would never say that
9 about her.
10 Q Isn't it true you said to Mr. Kasparian that
11 Anabel is hot and you'd like to fuck her?
12 A No. I said Anabel was pretty when your client
13 said he'd like to fuck her.
14 Q In the spring of 2015 did you attend a union
15 precinct walk in Concord, California?
16 A Repeat the date.
17 Q Spring of 2015.
18 A Yes, I believe so.
19 Q Isn't it true that you were not allowed to
20 board the plane -- were thrown off the plane before it
21 took off because you were drunk?
22 A I don't recall at this time.
23 Q You don't recall being removed from the plane?
24 A I recall being removed from the plane.
25 Q Do you recall why?

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1 A Yes.
2 Q What was the reason?
3 A I was experiencing a lot of emotional distress
4 because your client -- Monica had admitted to me in that
5 hotel that weekend that your client and her were having
6 an affair and that she was okay with having an affair
7 with a man that's married. I felt like both of them
8 were my friend and that they were not being honest with
9 me about what they stood for and their values.
10 Q Did you meet Ariana Casonova in Concord?
11 A Yes.
12 Q And shortly after you returned to
13 San Diego, did you tell Mr. Kasparian that you loved
14 Ariana and wanted to fuck her?
15 A I never said that I wanted to do that. I
16 would never say that about Ariana. I do love her
17 deeply. She's always going to be a good friend of mine.
18 I see her like a sister. But Ariana -- I don't see her
19 like that.
20 Q Did you attend a labor council event in Petco
21 Park on Labor Day 2015 for a Padre game?
22 A I believe so.
23 Q Did you accompany SEIU Local 221 President
24 David Garcias to the VIP section?
25 A I walked up there on my own. But at some

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1 point we sat together. I don't know if it was a VIP
2 section or not.
3 Q Well, was there a buffet there?
4 A I believe so.
5 Q So isn't it true that you came up behind
6 Mr. Kasparian in the buffet line and told him that even
7 though he was engaged you liked Nate Fariman from IBW
8 Local 465?
9 A No. That's false.
10 Q Isn't it true that you then said that Nate
11 actually let you rub his dick?
12 A I don't recall that.
13 Q Were you drunk when you said that?
14 A Again, I don't recall saying that.
15 Q Were you drunk on that occasion at the VIP
16 section at Petco Park?
17 A I was not.
18 Q Did you ever hack Mickey Kasparian's Facebook
19 account?
20 A No. But I suspect he's hacked mine.
21 Q Isn't it true in 2015 you told Sarah Saez that
22 Mickey Kasparian had an affair with Monica Bonilla?
23 A I don't know if that's the exact date, but I
24 do recall telling her and being told by her not to say
25 anything or else it would ruin the labor movement, being

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1 silenced by her, probably because of the fear that she
2 has, just like I did.
3 Q Where did that conversation take place?
4 A It was at a book signing event in downtown
5 near Logan Heights.
6 Q What book?
7 A There was a book that Jim Miller had
8 contributed to. I can't recall what the name of the
9 book signing was. But I asked her to go with me and
10 sought advice and was even more stunned and paralyzed
11 when she told me to be silent. But it made sense when
12 she later ran a campaign for city council that things
13 came together and I realized that she was just looking
14 out for her career. It broke me.
15 Q In late 2015 did you ask Mickey Kasparian to
16 go away with you to Mexico?
17 A I don't recall.
18 Q You earlier testified that there was an
19 incident in which Mr. Kasparian called you and you'd
20 been messaging and he acknowledged that he was
21 masturbating while on the phone with you; is that right?
22 A Earlier I mentioned an incident where he did
23 acknowledge that he was masturbating.
24 Q While on the phone with you?
25 A That's correct.

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1 Q And you testified that you heard the sound of
2 a penis ejaculating?
3 A I heard the sound -- and I should be specific
4 on that -- of a hand -- what sounded like a hand, you
5 know, giving a penis a handjob. That's the best way I
6 can describe it, the sound that the skin -- the flap of
7 the foreskin of a penis makes, and he was out of breath.
8 Q So you heard the sound of skin on skin?
9 A I heard what I thought was him masturbating
10 and what he acknowledged what he was doing, which was
11 masturbating.
12 Q Why didn't you get off the phone immediately
13 when he told you that?
14 A Because I saw him as a friend and mentor.
15 Q This is the same person who has accosted you
16 in the car, at this point twice and at the union hall,
17 literally put himself on top of you, according to your
18 story, and you still saw him as a friend and mentor?
19 Really?
20 MR. CORRALES: Objection. Argumentative.
21 When you use the word "really," you're
22 challenging her.
23 You just want her to answer the question
24 whether she saw him as a friend and mentor?
25 MR. FEINBERG: Fine.

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1 BY MR. FEINBERG:
 2 Q Answer the question.
 3 A At that point I still had hope that the
 4 incidents were isolated. I figured, you know, he got to
 5 power because, you know, he did good things. And by
 6 saying something I would jeopardize the working class in
 7 San Diego and possibly face retaliation. So I remained
 8 silent.
 9 Q Isn't it true in 2016 you repeatedly placed
 10 calls to Mr. Kasparian on an evening between 10:30 and
 11 11:00?
 12 A I don't recall that specifically at this time.
 13 Q Does it help if I said when he finally picked
 14 up he asked why you were calling him at that hour?
 15 A I don't recall at this time.
 16 Q Do you recall a conversation in which you told
 17 Mr. Kasparian, My roommates are gone; I want you to come
 18 over to my house, drink some wine, and fuck me?
 19 A No. I recall a conversation where
 20 Mr. Kasparian wanted me to have Monica and Alicia come
 21 over to my house, and he wanted to come over himself
 22 instead of a hotel because he didn't want anyone to see
 23 us.
 24 Q Was that before or after the hotel incident
 25 that you described?

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1 A I can't recall at this time.
 2 Q Well, had the hotel incident already occurred?
 3 A I can't recall at this time.
 4 Q In the early 2016 -- somewhere to the spring
 5 of 2016, isn't it true you got drunk at a happy hour
 6 fundraiser for Sarah Saez' campaign for San Diego city
 7 council?
 8 A I don't recall at this time.
 9 Q Isn't it true you hit on Sarah during that
 10 fundraiser?
 11 A I don't recall at this time. Sarah's a very
 12 friendly person. She hugs people. She used to hug me
 13 before this situation that divided the labor movement.
 14 So if she ever took my behavior as hitting on her, I was
 15 never informed of it. She never expressed anything to
 16 me. I always saw her as a sister.
 17 Q Isn't it true you told others that you had a
 18 relationship with Sarah Saez?
 19 A I don't recall at this time.
 20 Q Isn't it true that you told Sandy Naranjo that
 21 you had a crush on Sarah?
 22 A I don't recall telling one specific person. I
 23 do remember having a crush on Sarah.
 24 Q So more than just sisters then?
 25 A A crush, sir, could be having a crush on

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1 Ben Affleck, having a crush on someone that you find
 2 admirable. A crush doesn't mean that you see them in a
 3 sexual nature, not to those of us that are not pervasive
 4 [sic] and not a pervert.
 5 Q Isn't it true that you told Sarah Saez that
 6 Mickey Kasparian stole Monica Bonilla away from you?
 7 A I don't recall that at this time.
 8 Q Did you tell Sarah Saez that you wanted her
 9 and Mickey Kasparian to go to a mountain cabin with you?
 10 A I believe Mickey wanted to go to like a
 11 retreat with us. I do recall contacting Sarah and
 12 attempting to organize some kind of retreat. But I
 13 don't recall whether it was a cabin. I couldn't tell
 14 you. I don't recall.
 15 Q Do you have a cabin?
 16 A No, I don't.
 17 Q Do you have access to one?
 18 A I guess it depends on what you mean by access.
 19 But I don't own a cabin.
 20 Q Do you have access to a cabin in Wrightwood,
 21 California?
 22 A I don't.
 23 Q Do you have a friend who owns a cabin in
 24 Wrightwood, California?
 25 A I don't.

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1 Q Have you ever rented a cabin in Wrightwood,
 2 California?
 3 A I have not.
 4 Q Have you ever been to a cabin in Wrightwood,
 5 California?
 6 A I've driven by a cabin, but I never rented one
 7 or been to one in Wrightwood.
 8 Q Have you ever suggested to Sarah that you and
 9 she and Mickey should go to a cabin in Wrightwood?
 10 A I believe that we wanted to have a retreat
 11 with a few union sisters and brothers. Mickey was going
 12 to pay for it. And that never transpired. But I don't
 13 recall specifics about that.
 14 Q Did you ever tell Sarah Saez that you wanted
 15 her to be your wife?
 16 A No. I don't recall that at this time.
 17 Absolutely not.
 18 Q Do you ever recall saying to her you thought
 19 of her as your wife in another life?
 20 A No. But I recall a conversation where she
 21 admitted to me that she used to have a girlfriend and
 22 that I reminded her of her girlfriend. She told me this
 23 at a bar. But she's not open about her sexuality, so I
 24 probably shouldn't mention this. I don't want to throw
 25 anyone under the bus. But I'm giving everything I have,

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1 to the best of my knowledge.
2 Q We'll mark this document as Union No. 1.
3 MR. CORRALES: Exhibit No. 1?
4 MR. FEINBERG: For this deposition.
5 MR. CORRALES: You said Union No. 1.
6 MR. FEINBERG: Defendants' 1.
7 (Exhibit 1 was marked for identification by
8 the court reporter and is attached hereto.)
9 BY MR. FEINBERG:
10 Q Do you recall sending an e-mail of this nature
11 to Sarah Saez?
12 A Looking --
13 Q I mean a text message. Sorry.
14 A Looking at this, I'm reminded of a
15 conversation where she told me that I reminded her of
16 the love of her life, which was her former girlfriend.
17 Q Do you recall sending her a text that said,
18 Marry me; you're supposed to be my wife in a past life?
19 A I don't know what the rest of the context of
20 this text was, so I can't tell you yes or no.
21 Q Do you know someone named Alice?
22 A I do not.
23 Q So you don't know an Alice who wanted you to
24 come over to her house or apartment on November 1, 2015;
25 is that what you're testifying?

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1 A I'm testifying that I don't have a
2 recollection of knowing an Alice.
3 Q Okay.
4 A Yeah. Without seeing any other texts, I can't
5 tell you if this text was altered. I just don't know.
6 Q Isn't it true that in June 2016 at a labor
7 council dinner at the San Diego Zoo you approached
8 Mickey when he came off the stage where he --
9 A He approached me at that event.
10 Q Isn't it true you said to Mickey at the time,
11 How come you never let me watch you and Monica?
12 A I don't recall saying that.
13 Q Were you drunk that evening?
14 A I don't recall. I don't drink alcohol very
15 often. So I don't recall though.
16 Q Isn't it true in December 2016 you sent
17 Mr. Kasparian a text message on a Saturday evening and
18 said you were at the SEIU Christmas party?
19 A I don't recall.
20 Q Do you recall sending him a text that said,
21 Even though I'm drunk I got into a fight with a couple
22 of members in the bathroom who were saying bad things
23 about you because of the lawsuits; I stuck up for you?
24 A I remember feeling a lot of distress and
25 pressure from him to support him. I felt like he was

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1 going to retaliate against me if I didn't. But I
2 don't -- I can't recall specifically what I may or may
3 not have said. I just know that I felt more distress
4 over this past year and a half than I have my entire
5 life due to your client.
6 Q Well -- but in the situation that I just
7 described where you're in the bathroom with a couple of
8 other members at the SEIU Christmas party, how would, in
9 your my mind, Mr. Kasparian ever know what had happened
10 there unless you told him?
11 MR. CORRALES: Objection. Calls for
12 speculation.
13 THE WITNESS: Mr. Kasparian is very close to
14 David Garcias. They colluded to try to kick me off the
15 board. So I suspect anything I say gets repeated.
16 Mr. Kasparian also has, from time to time, gotten people
17 to spy on people. Sarah Saez was one of the spies. He
18 created a fake name on Yahoo under the, quote, Angela
19 name. So I wouldn't put anything past your client.
20 BY MR. FEINBERG:
21 Q Okay. But how would he know if you hadn't
22 said anything to these members in the bathroom?
23 A Because potentially the members could have, if
24 they were spies, told him, Oh, she stayed quiet. And,
25 thus, your client could have retaliated against me.

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1 Q You do realize you're speculating, right?
2 A You do realize that you're asking me
3 speculative questions, right?
4 Q Okay. Isn't it true that in or around May of
5 2017 you called Mr. Kasparian to tell him how you got
6 drunk with Noehlia Ramos at a party?
7 A Repeat the date, sir.
8 Q Around May of 2017.
9 A I don't recall a specific date, but I do
10 recall feeling like I was being spied on at a party by
11 Noehlia.
12 Q Isn't it true Noehlia was being critical of
13 Mr. Kasparian and defending Sandy and Anabel? This was
14 after Anabel's termination.
15 A I guess it would be up to the person's
16 interpretation. But my interpretation of it was, one,
17 she was either spying on me through Kasparian, which I
18 later found was not the case, or she was just very upset
19 about the fact that these women had to endure everything
20 they endured.
21 Q But isn't it true in response to Noehlia's
22 comments you defended Mr. Kasparian?
23 A It depends on what you would call defend. In
24 front of another friend, who happens to be an attorney
25 and made an oath to the State Bar of California, I told

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1 Noehlia that I believe that all people are entitled to
2 due process.
3 Q What friend was that?
4 A Bear with me. Arcy Magana.
5 Q Can you spell the first name.
6 A Yes. A-r-c-y.
7 Q And Magana is --
8 A M-a-g-a-n-a. She witnessed when I told
9 Noehlia that I believed the women had a right to file
10 those claims. And I believe he had due process rights
11 too. I couldn't say anything else in that situation
12 because I didn't know if she was spying on me. But in
13 my heart I wanted to support those women publicly, but I
14 couldn't.
15 Q Well -- but isn't it true that you threatened
16 Noehlia saying, I'm a board member at Local 221, and you
17 don't know who you're screwing with?
18 A I don't recall saying that.
19 Q Did you call up Mickey Kasparian and tell him
20 about this circumstance afterwards?
21 A I contacted Mickey. I can't recall whether I
22 sent him a message on Messenger or called him. But I
23 reached out to him because I thought he was spying on
24 me. So I wanted him to know that I was not, in his
25 mind, backstabbing him.

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1 Q And so you said to him, Let's get a drink and
2 catch up; is that right?
3 A I believe I wanted to meet in person.
4 Q Isn't it true that you also shared what had
5 gone on with Ms. Ramos with SEIU 221 president,
6 David Garcias?
7 A Shortly before David Garcias, in my eyes,
8 retaliated against Ms. Ramos' husband and fired him, I
9 did speak to him and tell him at the party this woman
10 approached me.
11 Q Okay. And when you discussed this
12 circumstance with Ms. Ramos -- so you did discuss the
13 situation with Ms. Ramos with Mr. Garcias? Yes?
14 A I remember briefly bringing it up.
15 Q Isn't it true that Mr. Garcias said, You need
16 to stop drinking?
17 A I don't recall that at this time.
18 Q And didn't you discuss -- didn't he discuss
19 with you you resigning from the SEIU Local 221 executive
20 board?
21 A Not at that time.
22 Q Was there a later time when he did?
23 A Yes. When he threatened me.
24 Q What did he threaten you with?
25 A When the allegations against me came about by

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1 Noehlia Ramos when she thought that I conspired to get
2 her husband fired and retaliate against her for her
3 support and her husband's support of Mickey, I reached
4 out to David Garcias to ask him to give me access to
5 counsel, since I was a board member. He refused
6 multiple requests on my behalf.
7 He said, You're not going to get access to an
8 attorney unless you're a party. But my name was
9 mentioned. And I felt like I was being slandered.
10 Nonetheless, he kept telling me that I needed to go to
11 the office -- I needed to go to the office to meet him.
12 I found that very suspicious. His tone of voice became
13 aggressive too.
14 That's when I told him, Look, I need you to
15 tell me what you're thinking. And that's when he told
16 me that I needed to resign from the board or he was
17 going to kick me off the board with the board members'
18 support because I supported the three women.
19 He also said I should not talk to anybody or
20 express any type of support for Sandy, Anabel, and
21 Isabel. He concocted with your client to retaliate
22 against me for my support. That same afternoon I tried
23 to reach out to Mickey, because I was going to make a
24 public statement. I told him, Let me meet with you
25 before. I wanted to tell him, even though I didn't

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1 respect him anymore at that point, in his face that,
2 yes, I was going to come out and publicly say I did not
3 do the things that Noehlia said that I did.
4 But I can see why she thought that. Her
5 husband was fired less than five days after I met up
6 with David Garcias. In my opinion David Garcias
7 retaliated against her husband just like he retaliated
8 against me for supporting the women. It was a direct
9 political retaliation.
10 Q And did you end up leaving the SEIU Local 221
11 board?
12 A I ended up seeking counsel from my college
13 professors, since David declined to give me counsel,
14 even though I was being accused under a union matter
15 which I thought would give me counsel. Nonetheless, my
16 -- both professors counseled me to remain silent and not
17 to leave the board.
18 They told me I could reach out to them if I
19 needed more help. I felt confident after that that if I
20 did need further legal counsel that I could reach out to
21 them. So I chose not to meet up with David Garcias.
22 But the message was very clear by David Garcias, You
23 support those women, you'll get kicked off the board.
24 I'm going to kick you off the board with the support of
25 the other board members. And he was going to try to use

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1 any past incidents that he could to try to do that.
2 I told him at that point I never thought I
3 would find myself in a situation that Alex Rodriguez was
4 in. That's when he said, Who's Alex Rodriguez? I said,
5 The most powerful baseball player to ever live. He sued
6 his own union because they didn't have his best
7 interests in mind.
8 Q Are you still on the SEIU Local 221 board?
9 A David has not been able to legally kick me
10 off, and I will not resign, yes. My term ends June
11 2018. I don't know how long that will be for though
12 because at the last general membership meeting your
13 client's friend David Garcias was very upset that I
14 helped pass a lot of resolutions. I have expressed
15 dissent against a lot of his positions, including
16 leaving the Working Families Council. And I received a
17 lot of retaliation because of that.
18 Q So did you ever discuss the argument that you
19 had with Noehlia Ramos with Ariana Casonova?
20 A Briefly.
21 Q Isn't it true after you told her about that
22 event that she told you that you needed to stop
23 drinking?
24 A I don't recall at this time.
25 Q In December of 2016 did you tell people from

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1 SEIU that you loved Mickey?
2 A What people are you talking about?
3 Q Members at Local 221.
4 A What members?
5 Q I don't have -- I'm not the one answering
6 questions, you are. If you don't know the answer, you
7 can say you don't know.
8 A Okay. I don't know.
9 Q Did you tell other people -- members at SEIU
10 Local 221 that you had known Mickey for ten years and
11 that he was your best friend?
12 A Mickey had asked me to tell people that we had
13 a long history.
14 Q When was that?
15 A Probably in early 2014. I don't recall at
16 this time though.
17 Q What was going on in early 2014 that he would
18 ask you to do that?
19 A I'm not sure. I guess you would ask your
20 client what was going on in his mind.
21 Q So you're saying he didn't explain to you why
22 he wanted you to do that? Are you saying that?
23 A I'm saying that I don't know what was going
24 on.
25 Q I'm asking what -- you said he asked you to

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1 talk to members of Local 221 to say nice things about
2 him back in 2014. I'm asking you: Did he tell you why
3 he wanted you to do that?
4 A I think he had a history of hitting somebody's
5 husband or something and he wanted to have a reputation
6 of being a good guy. That was my understanding of it.
7 Because he said he always fought for workers.
8 Q Isn't it true that you became angry with
9 Mickey Kasparian for ignoring you and you wanted to get
10 even with him?
11 A Absolutely not.
12 Q You think Mickey Kasparian and David Garcias
13 are working against you, right?
14 A I think that David Garcias and
15 Mickey Kasparian are working against the labor movement
16 in San Diego by jeopardizing the safety of the working
17 class, including women that have experienced harassment
18 from this sexual predator.
19 MR. FEINBERG: Motion to strike. Answer is
20 nonresponsive.
21 MR. CORRALES: Motion denied.
22 MR. FEINBERG: Could you please read the
23 question back.
24 (Question read back by the reporter.)
25 THE WITNESS: I think they're working against

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1 the labor movement in San Diego. I think that they're
2 holding the labor movement hostage. And I think that
3 they tried to silence me by explicitly telling me not to
4 speak and by telling my friend -- by Mickey telling my
5 friend Ariana to tell me to stay out of it when
6 referring to the three cases against Mr. Kasparian, by
7 threatening to kick me off the board, by threatening to
8 character assassinate me. But I'm okay with that. I'm
9 a public servant, and people know what my character
10 stands for.
11 BY MR. FEINBERG:
12 Q Now, this conversation you mentioned having
13 with Ariana Casonova where she told you to stay out of
14 the business of the lawsuits that was a phone call?
15 A Let me clear it up. You said where she told
16 me. She didn't tell me. She said that Mickey told her
17 to tell me to stay out of it. And I took that as a
18 direct threat or else.
19 She also said that your client tried to bribe
20 her in getting a better position, since he knew that she
21 was going to be resigning, and that because of me she
22 didn't take a position with him because she cares about
23 our friendship deeply and has integrity.
24 MR. FEINBERG: Motion to strike. Answer is
25 completely nonresponsive to the question.

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1 BY MR. FEINBERG:
2 Q All I asked you was whether the conversation
3 was on the telephone.
4 MR. CORRALES: Motion denied.
5 MR. FEINBERG: Your sarcasm is unwanted.
6 MR. CORRALES: Motion denied.
7 BY MR. FEINBERG:
8 Q Answer the question.
9 A What conversation?
10 Q Conversation you described where you discussed
11 the lawsuits with Ariana Casonova.
12 A We've had a few conversations.
13 Q The one where she said to stay out of it or if
14 you say so then Mickey told her to tell you to stay out
15 of it.
16 A What about that conversation?
17 Q Was that in person or on the phone?
18 A That was over the phone.
19 Q Who called who?
20 A I can't recall at this time.
21 Q You say your car got broken into.
22 Did you report it to the police?
23 A Yes.
24 Q Did they investigate?
25 A I don't know if they investigated it, but I

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1 have the police report. And in the police report I
2 specifically cite that I thought my life was in danger
3 and that your client, in my opinion, was trying to deter
4 me from testifying. The fear he has caused is beyond
5 what's noted here.
6 Q When was your car broken into?
7 A I'd have to look at the police report.
8 Q Well, approximately.
9 A I'd have to look at the police report.
10 Q Was it --
11 A When was Sandy's -- well, I guess I can't ask
12 a question here.
13 Q Was it this year that your car got broken
14 into?
15 A That's correct. Sometime between December
16 2016 and today.
17 Q You said that someone called you named Angela
18 on the job -- someone called you on the job named
19 Angela.
20 A A person whose voice matched Sarah Saez called
21 my jobsite and specifically called my extension and
22 requested to speak to me. Another coworker spoke to
23 that person and then had me speak to them. That's
24 correct.
25 Q And there was something about a fake account.

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1 I'm not clear what you were talking about.
2 A Your client can confirm that information. I'm
3 sure he'll do that.
4 Q Why don't you tell us what you think you know
5 about this fake account.
6 A What I know is that your client introduced me
7 to someone by the name of Angela.
8 Q In person?
9 A Online, the same way that I introduced him to
10 Ariana Casonova online. The difference is that your
11 client created a fictitious name, created a delusional
12 character to get info out of me. Her name was Angela.
13 Q How do you know that?
14 A Because she knew everything about the
15 lawsuits. She knew information that only Mickey knew.
16 She knew that Nate Fariman got approximately \$4,000 from
17 Jerry Buckowitz when he was running for executive board.
18 And also I know it to be true because Mickey would often
19 mention Angela in different conversations. And I would
20 ask Angela, Hey, you want to meet up with Mickey, just
21 so I can confirm she was, in fact, fake, she could never
22 meet up with me. She always claimed her mother was
23 sick.
24 Q So the communication you had with Angela were
25 by what method?

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1 A Messenger, same way I communicated with your
2 client. And on the same nights that your client would
3 message me with his own Yahoo Messenger, Angela would
4 then message me minutes later. And if you want to go
5 further -- if this case continues, I'm sure that the IP
6 address will confirm everything that I'm saying.
7 Q And the last time you heard from this Angela
8 was when?
9 A I can't recall at this time.
10 Q Was it within the last six months?
11 A Time between December 2016 and today.
12 Q What were you talking about?
13 A I can't recall at this time.
14 Q Do you have any of those Facebook Messenger
15 messages on your phone or computer?
16 A I can't recall at this time.
17 Q This comment you say Sarah Saez said to you
18 your mom was a whore, how was that communicated to you?
19 A When my coworker Cecilia said, Melody, you
20 have a phone call, I told her to ask who it is. And the
21 person told her Angela. The only Angela that I recall
22 knowing is the Angela that Mickey introduced me to, his
23 friend Angela. And that's when the person -- when I
24 answered I said, Hello, this is Melody, County of
25 San Diego. She -- she made me feel like my life and my

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1 mother's life was in danger. She said, Your mom is a
 2 whore.
 3 Q There was no preface to that? She didn't say
 4 anything before that?
 5 A My car was broken into before that.
 6 Q No, no. This person who was on the phone with
 7 you, the moment she gets on the phone with you she says
 8 to you that your mom is a whore; or was there any
 9 conversation that preceded that?
 10 A They --
 11 Q Just yes or no.
 12 A That can't be answered like that.
 13 Q Sure it can.
 14 A No, it can't.
 15 Q Was there a conversation in this phone call
 16 that preceded her saying to you your mom is a whore?
 17 A I just told you everything that happened, to
 18 the best of my knowledge.
 19 Q So you don't recall if there was any
 20 conversation before this person said your mom is a
 21 whore; is that correct?
 22 A As noted a moment ago, my coworker asked who
 23 the person was. The person said Angela. I answered.
 24 She proceeded to say that my mother was a whore. I took
 25 it as a direct threat.

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1 Further, speaking about Sarah, she sent me a
 2 thumbs up on Facebook this week. Your client is clearly
 3 trying to intimidate me. It's obvious. My car gets
 4 broken into. That never happened in seven years. This
 5 woman is trying to character assassinate me. I feel bad
 6 because I cared about her deeply as a friend, but she's
 7 right in the middle of it. Your client is intimidating
 8 a lot of people in San Diego. He's dividing people. He
 9 needs to resign.
 10 Q So just to be clear, what you've testified to
 11 is that this person Angela called your office; a
 12 coworker took the call and told you Angela was on the
 13 phone; and when you picked it up, this person says to
 14 you, without any prefatory language, your mom is a
 15 whore; is that correct?
 16 A She said it in a very cold voice, Your mother
 17 -- your mom's a whore.
 18 Q But is it correct there was nothing preceding
 19 that in what you heard on the phone?
 20 A What I heard on the phone is different than
 21 what you're saying.
 22 Q What did you hear on the phone?
 23 A What I heard on the phone was a direct threat.
 24 Q What words did you hear on the phone?
 25 A There we go now. We're on the same page.

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1 Words that I heard were threatening words, Your mom is a
 2 whore. The love of my life is a whore. If I speak at
 3 this deposition, my mother's life, my life is in danger.
 4 That's what I heard.
 5 Q The deposition was actually mentioned in this
 6 phone call? Are you saying that?
 7 A I'm saying, sir, that I know very early on
 8 when those lawsuits were filed that I would be deposed.
 9 It doesn't take a rocket scientist to know that if you
 10 see indications of the reality of the allegations
 11 against someone and you're going to, under penalty of
 12 perjury, be honest and come forward --
 13 Q Melody, this is a simple question. All I was
 14 asking you is what was said. I'm not asking you to read
 15 in. I'm not asking what you thought about. I'm not
 16 asking how it affected you. You may be right. But no
 17 perspective about all of that. All I was asking you is
 18 what was said, the words used.
 19 Other than the words your mother or mom is a
 20 whore, what else did this person on the phone say to
 21 you?
 22 A I understood your question --
 23 Q You're not answering the question.
 24 A You use a lot of contextual statements
 25 throughout this deposition. And, thus, I'm answering to

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1 the best of my knowledge.
 2 Q So are you clear what I'm asking of you now?
 3 A Yes.
 4 Q Were there any other words used besides your
 5 mother is a whore?
 6 A Not that I can recall.
 7 Q Thank you.
 8 MR. CORRALES: How much longer do you think
 9 you have?
 10 MR. FEINBERG: I think we should take a lunch
 11 break and come back.
 12 MR. CORRALES: Okay.
 13 (Recess taken.)
 14 MR. CORRALES: Back on the record.
 15 I propose that we stipulate to relieve the
 16 court reporter of her duties --
 17 MR. FEINBERG: No.
 18 MR. CORRALES: No? Okay. Fine.
 19 By Code?
 20 MR. FEINBERG: By Code.
 21 (TIME NOTED 1:09 p.m.)
 22
 23
 24
 25

<p style="text-align: center;">\$</p> <hr/> <p>\$15 71:18 75:5,19 \$4,000 135:16 \$500 34:15</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 121:2,3,5,6,7,24 1/2 10:4 10 18:17 87:10 90:14 91:18 93:3 100 70:6 94:20 111:23 1000 105:12 107:13 1021 45:19 68:11 10:30 117:10 11:00 117:11 12,000 12:25 135 24:8 25:20 49:17 58:1 60:25 94:3,15 104:2 111:8 15 8:15 12:25 38:5 75:13,14, 15,18 92:21,22,24 93:4,12, 14 15th 73:1,6,8 16th 73:1,7,8 1:09 140:21</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2004 10:25 2010 80:6,9,10 2014 19:13 69:15,20 75:21 80:1,2,4,10,14 111:1,4 130:15,17 131:2 2015 22:2 30:11 44:1,2 56:24 57:9 71:2 72:21 73:6, 12,14 74:5 103:25 110:11 112:14,17 113:21 114:21 115:15 121:24 2016 22:2 61:15,21 71:2 74:6 117:9 118:4,5 122:6,16 129:25 134:16 136:11</p>	<p>2017 5:1 103:7,8 124:5,8 2018 129:11 21 64:14 65:1 221 12:2,21 66:20 104:10 109:25 110:3 113:23 125:16 126:5,19 128:10 129:8 130:3,10 131:1</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>300 34:15</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>465 114:8</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 5:1 70 11:7</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9:33 5:2</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>A-R-C-Y 125:6 a.m. 5:2 abdominal 27:22 ability 8:14 9:12 32:8 Absolutely 27:25 29:7 47:24 83:20 106:11 112:1,3, 6 120:17 131:11 abusive 88:19 access 29:22 67:11 119:17, 18,20 127:4,7 accident 9:1,4 accompanied 37:23 accompany 113:23 accosted 95:3 116:15 account 46:22 77:17,23 78:1 114:19 134:25 135:5</p>	<p>accounts 46:20 accused 128:14 acknowledge 23:9 51:20 115:23 acknowledged 25:17 44:7 52:4 109:14 115:20 116:10 acknowledging 25:16 42:7 acquainted 78:19 acted 69:7 actions 108:20 active 12:2,6,8,15 80:19 activist 80:13,15,16 activities 11:24 12:17 activity 19:19 21:15,21 71:6,10 91:20,25 92:1,2 addition 40:3 additional 28:16 address 30:15 136:6 adjacent 40:10 admirable 119:2 admire 75:2 76:5 admired 11:20 74:25 82:17 admitted 56:24 57:2 113:4 120:21 advance 53:25 advances 56:4 87:19 90:20 95:3 advice 115:10 advised 67:12 advising 65:12 affair 56:18 57:1 113:6 114:22 affairs 57:11 affect 9:14 47:2 53:2 109:20 affected 139:16 Affleck 119:1 afraid 46:1 52:22,23,25 87:5 afternoon 127:22</p>	<p>aggressive 90:9 127:13 aghost 89:13 agreed 21:24 30:18 38:25 109:6 agreeing 79:20 ahead 14:12 33:1,23 52:2 57:19 89:17 105:3 alarm 96:13 alcohol 9:13,18 26:9,14 27:9,15 28:23 29:24 64:10, 13,14,15,16 82:24 122:14 alcoholic 58:14,16 Alex 129:3,4 Alice 121:21,23 122:2 Alicia 31:5,12,14 33:4,6,8 35:17,25 36:15,20,21,25 37:21 38:24 39:21 41:7,11 105:9,18,24 106:5,20 107:7, 16,24 108:5,10,16,19,24 109:1,3,4,7 117:20 allegation 70:13 allegations 52:20 60:23 103:3,4 126:25 139:10 alleged 46:25 109:19 allegedly 86:16 92:19 allowed 112:19 altered 122:5 Alvarez 75:1 Anabel 46:6 52:20 112:11, 12 124:13 127:20 Anabel's 124:14 Angela 46:19 47:3,4,7,12 123:18 134:17,19 135:7,12, 19,20,24 136:3,7,21,22,23 137:23 138:11,12 anger 84:2 angry 131:8 Answer's 59:1 answering 70:24 110:22 130:5 139:23,25 anxiety 30:5 69:6,8 70:18, 21 83:24,25</p>
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